

Department of Planning  
New South Wales Government

30 August 2024

Dear Sir or Madam

## HOMEBUSH STATION TRANSPORT ORIENTED DEVELOPMENT (TOD) PROPOSAL

We make these submissions in relation to the Transport Orientated Development rezoning proposal, as published on <https://www.planningportal.nsw.gov.au/draftplans/exhibition/homebush-tod-rezoning-proposal> (the **Homebush TOD Proposal**).

The Homebush Residents' Group, Inc. (the **HRG**), is an association of residents in and around the area known as Homebush village, which is located to the south of Homebush station in the suburbs of Homebush and Strathfield. The HRG is registered in New South Wales as an incorporated association with an incorporation number INC2201289.

### 1 Summary

The HRG shares the concerns of most Sydney residents with housing affordability. In broad terms, we are supportive of the Government's, and Strathfield Council's, vision that the Parramatta Road corridor and the future Metro West corridor should support higher density residential development.

However, the current Homebush TOD Proposal does not pay sufficient heed to the negative externalities created by increasing density. It is important that these externalities are properly managed, so that the area will, as far as possible, retain the character of an attractive residential community for both the future community within the TOD area as well as surrounding communities.

We urge the Government to consider the following issues and to work with Strathfield Council to achieve a better balanced approach.

- Confusion in the wider community with the name "Homebush" causes problems in public and private sector service delivery to residents in the suburb of Homebush as well as surrounding areas. The name of the TOD area ("Homebush") does not match the suburbs actually included in it. To prevent exacerbating the issue going forward, the HRG **urges the Government** to work with Councils to request the Geographical Names Board to adjust suburb boundaries, so that there is clear delineation between the TOD precinct and surrounding areas.
- The HRG **opposes** the zoning of land facing Loftus Crescent, along the southern boundary of the TOD area, as High Density Residential and High Density Mixed Use. It would achieve better planning outcomes (including in terms of congestion and shading) if this area is zoned as Medium Density Residential, while the land further north, on both sides of Parramatta Road, should be rezoned to High Density Mixed Use. Medium density along Lotus Crescent would also be more visually appealing, and a better alternative to what is currently seen from the railway corridor.
- The HRG is concerned by the lack of proposals as to new roadways in the area north of Homebush station and south of Parramatta Road, **and urges the Government** to redesign the proposal and implement a more coherent design.
- The HRG is concerned about some of the proposals in relation to heritage protection. In this regard, we **support the submissions** made by the Strathfield-Homebush District Historical Society.

We explain our submissions in greater detail below.

## **2 Where is "Homebush"**

### **2.1 The two parts of Homebush the suburb**

The suburb of "Homebush", as gazetted in 1995, comprises two parts:

- a small area south of Homebush station. For most of the 20<sup>th</sup> century, this area was part of the district known as "Strathfield". In the 19<sup>th</sup> century, it was part of the "Village of Homebush" estate. Most of the "Village of Homebush" estate remains in the modern suburb of Strathfield, but three east-west-running streets parallel to the railway were included in the suburb of Homebush in 1995. Because this area was carved out of the suburb of Strathfield, it has an irrational and irregular boundary, consisting of the boundary fences of individual land lots. This area is not within the TOD area.
- a larger area north of Homebush station. Until 1947, it was in a separate municipality. The area traditionally known as "Homebush" also included an area that (since 1995) has been in the suburb of North Strathfield. This area is in the TOD area.

These two areas are not well-connected to each other. There are only two road connections: the Bridge Road bridge over the railway, and the Subway Lane underpass under the railway. By contrast, the small southern portion of Homebush is indistinguishable from Strathfield by any measure, while the larger northern portion of Homebush is much better connected with North Strathfield and Concord West.

### **2.2 The "Homebush" of popular understanding and the TOD**

Informally, the wider community in Sydney understand "Homebush" to mean an area adjacent to Parramatta Road, extending into surrounding suburbs such as Sydney Olympic Park and North Strathfield. Few in the wider community associate the area around and south of the station with the name "Homebush". Indeed, for many years now, Canada Bay Council has been referring to an area in Concord West, Concord and North Strathfield as "Homebush North Precinct", when the whole area is outside the suburb of Homebush. The problem is exacerbated by the renaming in 1992 of Flemington to "Homebush West", which further confuses the wider community when the name "Homebush" is used.

In this respect, the "Homebush" TOD aligns with popular understanding but not suburb boundaries.

### **2.3 The problem for residents**

This confusion causes a variety of problems for Homebush residents. For example:

- Policing for Strathfield is the responsibility of Burwood police station, but policing for Homebush is handled by Auburn police station. The southern part of Homebush therefore experiences significant delays when calling the police, when it would be much easier for police from Burwood police station to attend in this area.
- Driving and delivery services, including taxis, ambulances and delivery services, when asked to navigate to an address in "Homebush", often first navigate to the larger area north of the railway, and residents experience inconvenient or dangerous delay (and unnecessary expense) as drivers then seek to navigate across the railway.
- School catchment boundaries in the area largely follow suburb boundaries. Residents of the southern part of Homebush are allocated to attend the overcrowded Homebush Public School, which also services the larger northern part of Homebush, whereas their neighbours (sometimes on the street block) attend the better resourced Marie Bashir Public School in Strathfield.

The proposed increase in population in the TOD area will exponentially exacerbate these issues. The centre of population mass for the area move firmly to the north. The wider community will even more than now perceive "Homebush" in a different location to the area south of the station. Moreover, we are

concerned that any public or private service setting which is based on suburb boundaries will cater almost exclusively to the needs of the residents in the TOD area, and the part of the suburb that lies south of the railway will be ignored.

The same will apply to other suburbs that are partly in the TOD area and partly outside, such as Strathfield, North Strathfield and Concord West.

## 2.4 Proposed solutions

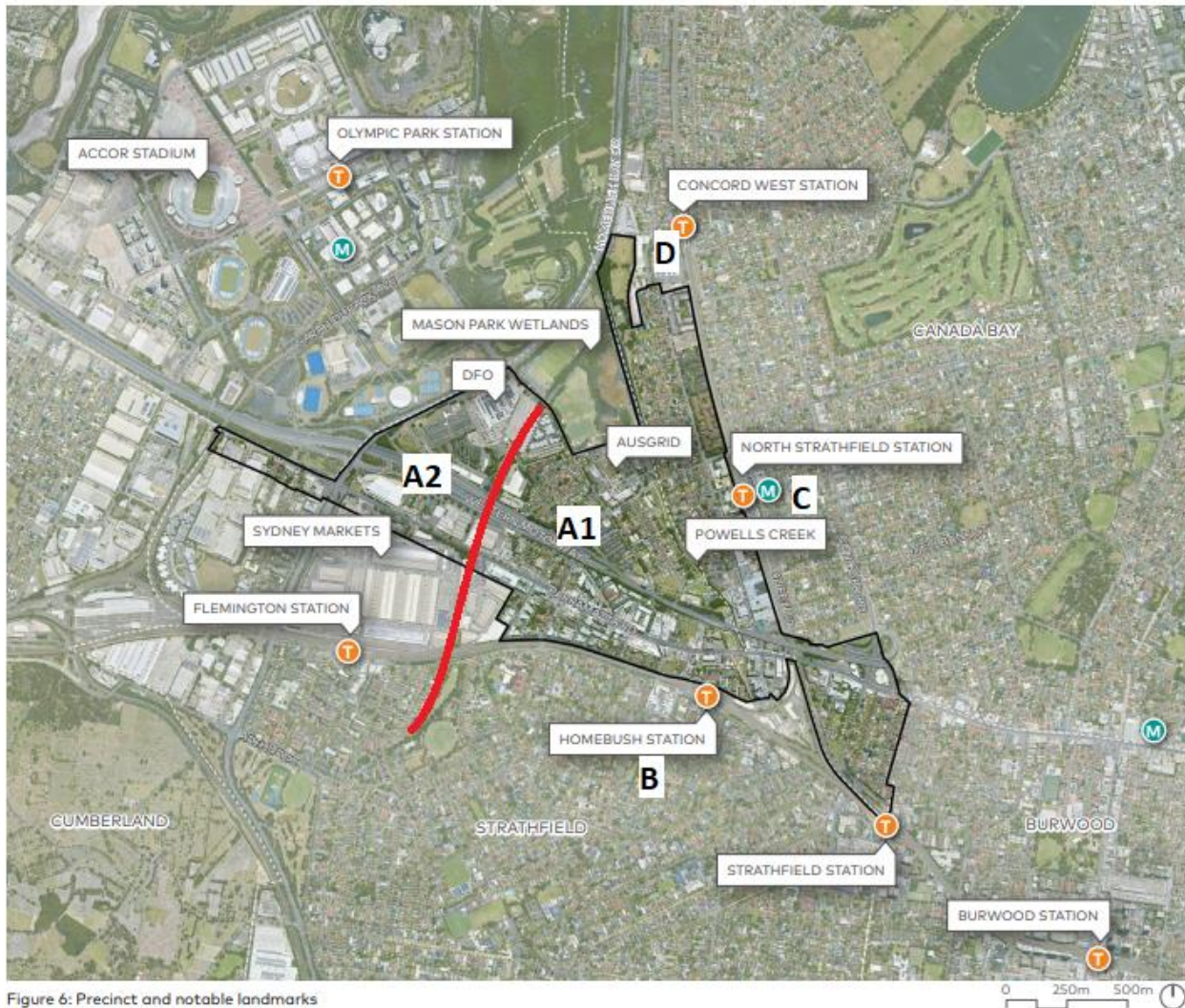


Figure 6: Precinct and notable landmarks

Our suggestion for the various affected areas are as follows (the location of the relevant areas are indicated by capital letters in the map above): The red line in the map above marks Saleyards Creek.

	Description	Current suburb allocation	Proposed suburb allocation
<b>A1</b>	TOD residential area east of Saleyards Creek	Part of Homebush, part of North Strathfield, part of Strathfield, part of Concord West	Standalone suburb to be called "North Homebush" (preferred)
<b>A2</b>	TOD non-residential area west of Saleyards Creek	Part of Homebush (north of Parramatta Road), part of Homebush West (south of Parramatta Road)	Merge with Homebush West (including Flemington Markets and Couralie Avenue area), to be called "Flemington"
<b>B</b>	South of TOD, east of Saleyards Creek/Airey Park, west of Homebush Road	Southern part of Homebush	Standalone suburb to be called "Homebush", or merge back into Strathfield

<b>C</b>	East of TOD, north of M4, south of Gracemere Street	Eastern part of North Strathfield	Standalone suburb, or merge with Concord or Conrod West
<b>D</b>	North of TOD	North/eastern part of Concord West	Retain as standalone suburb, or merge with North Strathfield or Concord

These reorganised boundaries will be more consistent with both geography the identity of the TOD area in the popular understanding of the community. Further, giving the residential part of the TOD area its own suburb identity will better reflect the uniquely energetic and dynamic future character of the TOD area, while allowing surrounding areas not in the TOD area to be dealt with as part of the suburbs with which they are best aligned. The reorganisaiton will help achieve more rational planning of government services and improve amenity for residents by avoiding the issues outlined above.

In most cases, the proposed reorganisations will also reflect be consistent with heritage considerations. For example, the southern part of Homebush was for most of the 20<sup>th</sup> century part of "Strathfield" and separate from the northern part of Homebush in the TOD area. Similarly, the western part of North Strathfield within the TOD area was for most of the 20<sup>th</sup> century part of "Homebush" and separate from the eastern part in Concord.

We urge the Government to include these boundary changes in the masterplan for the TOD

### **3 Zoning – land facing Loftus Crescent**

The TOD currently proposes that the land between Loftus Lane and Loftus Crescent should be rezoned to High Density Residential in the west, and High Density Mixed Use in the east (see Figure 1). By contrast, the area along Parramatta Road and the M4 are to be zoned Mixed Use.

The northwestern end of the area proposed to be zoned high density along Loftus Lane is too far from Homebush station for residents to feasibly use Homebush station for daily commutes. It is more likely that their primary access route for transportation will be northward, towards Parramatta Road, the M4 and the North Strathfield metro station

High density developments along Loftus Crescent are problematic, as the area immediately abuts low density residential land across the railway line. The railway corridor is relatively narrow in this area, and high rise developments along Loftus Crescent would present overshadowing problems for the land south of the railway line, as well as for the mature trees along both Loftus Crescent and the Crescent, which are important for the character of the area. Further, access for residents in this area are already problematic, with traffic congestion along the access routes to Parramatta Road and the M4, and the proposed widening of Loftus Lane, while helpful, will not be sufficient to address these issues.

Therefore, we submit that it would be preferable to make these areas Medium Density, at least west of Knight Street. (These concerns do not apply to the area east of Knight Street, where the wider railway corridor alleviates concerns about the height of buildings to the north of the railway line.)

By contrast, the area north of Loftus Lane and south of the M4, on both sides of Parramatta Road, are currently marked as "Mixed Use". To compensate for reducing the density along Loftus Crescent, we submit that the areas along Parramatta Road should be rezoned as High Density Mixed Use, given that these areas are not affected by any overshadowing concerns, and these areas have more direct access to Parramatta Road and the M4.

We submit that the high density developments along the Victoria Road corridor in the Drummoyne area, with medium density on the same blocks facing away from Victoria Road, demonstrates a successful model for density to be centred on the arterial road corridor. This would be the preferable design outcome in this area.



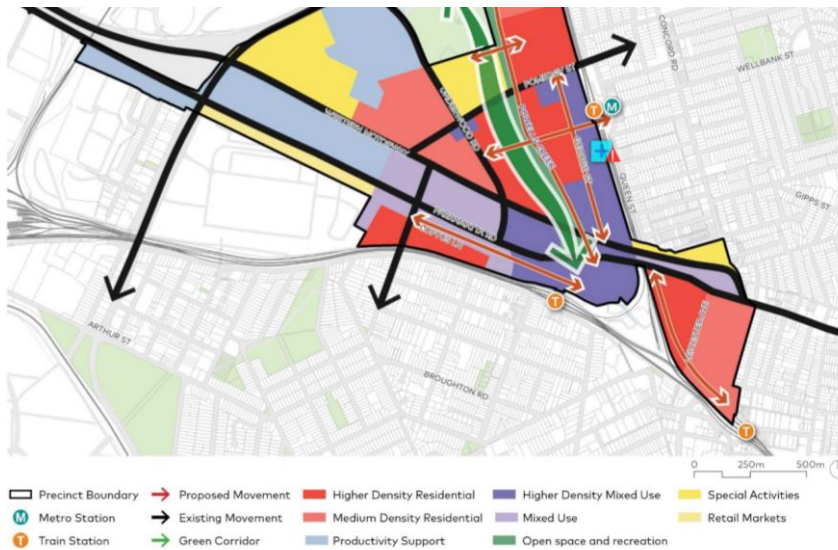


Figure 1: Extract of zoning diagram from Homebush TOD Design Guide published July 2024.

#### 4 Subway Lane and other roads north of railway and south of Parramatta Road

As explained above, there are only two roadways that provide access between the southern part of Homebush (south of the railway, outside the TOD area) and the northern part of Homebush (in the TOD area): Subway Lane and Bridge Road. The residents of southern Homebush and Strathfield rely on these two roads to access Parramatta Road, the M4 and Underwood Road (which acts as a major access point for the A3 and Sydney Olympic Park). The residents of the area between the railway line and Parramatta Road also rely heavily on these two access points when they need to travel east along Parramatta Road, or to access the M4.

Both routes are currently heavily congested. In the case of Subway Lane, traffic crossing the railway must navigate an oblique roundabout immediately north of the railway line. Cars cannot travel north along Subway Lane beyond the roundabout, and must instead turn east to travel via Knight Street, but to do so cars need to contend with pedestrians who cross illegally in order to access the pedestrian subway.

Neither Bridge Road nor Subway Lane/Knight Street align with any streets north of Parramatta Road, or any on/off-ramps for the M4. This means that, in order to cross Parramatta Road or access the M4, residents must join the congestion on Parramatta Road, worsening it.

For the TOD area, the nearest alternative signalled crossing of Parramatta Road is at Leicester Avenue, but traffic in that area must first undertake an unsignalled turn from Cooper Street onto Leicester Avenue.

Increased density and the proposed widening of Loftus Lane will only exacerbate these issues.

The TOD masterplan is an opportunity to remedy these issues. We urge the Government to redesign the road pattern in this area to reduce congestion and provide for easier access to Parramatta Road for residents. In addition to the proposed widening of Loftus Lane, some suggested approaches include:

- A new road east of Station Street, which provides signalled access from Loftus Crescent directly to the M4 westbound on-ramp.
- Widening Subway Lane so that it can accommodate two-lane traffic.
- Realigning the Subway Lane/Parramatta Road intersection to provide a signalled cross-intersection with Parramatta Road which is aligned with Underwood Road, so that traffic can cross Parramatta Road from Subway Lane to Underwood Road and vice versa.
- If Subway Lane cannot be widened and realigned, closing the railway underpass to vehicular traffic altogether.

## **Homebush Residents' Group, Inc.**

- Providing a signalled intersection at the northern end of Cooper Street with Parramatta Road, so that traffic travelling east does not need to use the unsignalled intersections with either Parramatta Road or Leicester Avenue.

### **5 Heritage matters**

We have had the advantage of reading the submissions of Strathfield-Homebush District Historical Society. We agree with those submissions and urge the Government to address them.

### **6 Conclusion**

Residents in the area appreciate the importance of addressing the housing crisis, but we urge the Government to also appreciate the toll on established communities that are proposed to be disrupted, if not wholesale destroyed. Clearly, the communities in TOD areas as well as adjacent areas are making sacrifices so that communities in other areas do not have to. We urge the Government to address the fairly modest asks from the Homebush community that are set out in these submissions, which will also be beneficial to the future communities in the TOD area.

Yours faithfully

Homebush Residents' Group, Inc.