

18 April 2014

Mr Michael File  
Director – Strategic Sites  
NSW Planning & Infrastructure  
GPO Box 39  
SYDNEY NSW 2001

Dear Mr File,

**SUBMISSION ON CARTER STREET LIDCOMBE URBAN ACTIVATION PRECINCT**

Thank you for the opportunity to provide a submission to the proposed Carter Street Lidcombe Urban Activation Precinct (UAP) on behalf of the Sydney Olympic Park Authority (the Authority).

The Authority supports the concept of the Carter Street UAP in the context of NSW's drive for well located housing. It is acknowledged that the Carter Street UAP will benefit significantly from its proximity to the Sydney Olympic Park town centre, transport facilities, major event venues, sporting and recreational facilities. However, the Authority is mindful that any additional residential development needs to be accommodated with minimal adverse impact on the Major Event operations of Australia's premier major event precinct.

**Sydney Olympic Park – State Significant Site**

Sydney Olympic Park operates under the Sydney Olympic Park Authority Act 2001 and is a State Significant Site under Schedule 3 of the State Environmental Planning Policy (Major Development) 2005.

The Authority has three key roles in supporting and managing Sydney Olympic Park:

1. *Growing and maintaining Australia's premier sporting, entertainment and recreation precinct.*

Sydney Olympic Park proudly hosts over 5,000 events annually, with in excess of 12.5 million visitors, and on more than 50 days per year the park hosts greater than 30,000 visitors in a single day. As one of Australia's leading cultural precincts the successful growth and management of the precinct is an important contributor to the NSW economy.

## *2. Implementing Sydney Olympic Park Master Plan 2030*

The development of Sydney Olympic Park to date has resulted in the delivery of approximately 30% of the total built form provided by the Sydney Olympic Park Master Plan 2030. Today there are some 14,000 workers, 1,500 students, 500 residents, and 8,000 daily visitors to Sydney Olympic Park. Sydney Olympic Park currently has in excess of 150 nationally significant businesses, with many hosting their national head office within our town centre. Development continues to occur at a rapid rate with four new commercial office buildings currently under construction, representing some 100,000 m<sup>2</sup> of GFA, along with three residential sites in various stages of design which will deliver some 1,150 apartments by 2018. By 2018 it is expected that 50% of the total built form provided by the Sydney Olympic Park Master Plan 2030 will be completed.

## *3. Manager of national and regionally significant Parklands*

The authority manages over 430Ha of parklands of national and regional significance, which attract over 2.9 million visitors annually. Of this 430Ha Sydney Olympic Park, Parklands have available:

- 136Ha for unstructured leisure and play; and
- 40Ha for structured or organised sport and recreation;

Of the remaining parklands, 116Ha is allocated to conservation and nature reserves, and 137Ha of wetlands. These areas have no or very limited recreational capacity or potential.

Given the Authority's role as outlined above, there are six areas of the proposed Carter Street UAP which may impact adversely on the operations and development of Sydney Olympic Park. These are:

1. Noise
2. Coach Parking/Local Centre Interface
3. Open Space
4. Traffic and Transport
5. Infrastructure
6. Stormwater Management

### **1. Noise**

Major event noise and its management is a significant issue for Sydney Olympic Park. The Sydney Olympic Park Master Plan 2030 was based upon the premise of using commercial development as a shield/buffer to residential development, along with the requirement for a positive covenant on all residential titles.

The Carter Street UAP provides residential development considerably closer, all but neighbouring, to the major noise generators than the residential areas of Sydney Olympic Park and with no opportunity for physical buffers to provide noise attenuation. The UAP submitted acoustic report outlines a number of measures to ensure future resident's

amenity when inside their apartments with all windows and doors closed. The UAP proposal does not provide commercial buildings (as is planned for Sydney Olympic Park) to effectively buffer event related noise. If residential development is going to be located as per the UAP, then additional measures (in addition to the legal noise covenants) will need to be put in place to achieve higher levels of noise attenuation in residential buildings.

You may not be aware that even now with careful noise management, SOPA receives complaints from residential areas (i.e. Newington), which is much further away than residents proposed in the UAP.

As the number, frequency and scale of major events held at Sydney Olympic Park continue to grow, the positive covenant proposed in the Carter Street Development Control Plan (DCP) will be critical in protecting both the Authority and the viability of NSW's major event precinct into the future. However, it is considered that the DCP is not the appropriate place to enforce the requirement for a positive covenant. DCP's are discretionary documents and this provision should not be considered discretionary, it must be a mandatory requirement for all future property titles and to be a condition of all development consents. The Authority requests that the requirement for a positive covenant be moved to an Environmental Planning Instrument (EPI) such as the Auburn Local Environmental Plan or a State Environmental Planning Policy, which ever becomes the prevailing EPI for this site.

## **2. Coach Parking/Local Centre Interface**

The Authority has some concerns with the B2 Local Centre zone extending parallel to Edwin Flack Avenue and the Coach Parking area. It is noted that there is no draft land use table in the documentation identifying permissible uses in the B2 zone, however the local centre zone would imply shops, cafes and other local service facilities. Such uses will not have a particularly pleasant outlook in the immediate future, across the at-grade coach parking, back of house to ANZ and Allphones Arena, the current V8 Super cars race track and potentially with a significant level change between the two areas. The Authority's coach parking is critical to the major event capabilities of Sydney Olympic Park and at this point in time there is not alternative location.

## **3. Open Space**

The future population of Carter Street UAP will require a greater amount of open space than what has been identified in the UAP. The Sydney Olympic Park, Parklands are regional facilities for the benefit of Greater Sydney. Current demand on the Parklands is very high particularly at Bicentennial Park and Blaxland Riverside Park both of which, visitation already exceeds capacity on many weekends and peak holiday times.

Areas surrounding Sydney Olympic Park such as Wentworth Point have also provided minimal amounts of local open space, which adds further pressure to the Sydney Olympic Park, Parklands. It should also be noted that the Sydney Olympic Park, Parklands are a

reasonable distance from the Carter Street UAP site and therefore do not offer open space within walkable distances.

#### **4. Traffic and Transport**

##### *Sydney Olympic Park Authority Act 2001*

One of the fundamental aspects of the Authority's role is the coordination of major events. This role is supported through the SOPA Act which authorises the Authority to "control and regulate traffic in any manner and for any purpose". The Planning Report at page 25 states:

*"As part of this project, it is recommended that the non-SOPA controlled roads over which SOPA has authority to prepare and implement traffic management (including closing or temporarily banning parking) under the SOPA Act (2001) be revised, such that streets that provide access to residences and businesses, such as Carter Street and Uhrig Road are removed, and new residential streets are not added."*

The Authority considers that the event traffic and transport controls are 'tried and tested' and should be retained. Any change to the Authority's ability to open and close roads which connect to Sydney Olympic Park will significantly impede the effective management of the precinct under major event conditions, and will result in undesirable traffic conditions for future residents of the Carter Street UAP. If the Authority has no ability to manage the local road network, future residents will find it difficult to access their homes during major events.

Newington which is further from Sydney Olympic Park than the Carter Street UAP site currently experiences congested parking and traffic delays in the local network during most event days and in park commuter periods. Auburn Council is better placed to comment on resident concerns about Newington issues.

##### *Local and Regional Network*

The Planning Report recommends a number of local road improvements to support the Carter Street UAP. However, issues related to the regional road network and the key gateway intersections (i.e. Homebush Bay/Australia Ave; Parramatta Rd/Birnie Ave; Parramatta Rd/M4/Hill Rd and Holker St/Silverwater Rd) are only identifying requiring "investigation". This is a very similar approach to the Wentworth Point UAP and does not identify who will actually carryout and fund essential infrastructure works.

##### *WestConnex*

The Carter Street UAP should consider both current and future plans of WestConnex as these may impact on whether or not Carter Street can be the major gateway to this site.

### *Parramatta Light Rail Project*

It is noted that the Carter Street UAP, along with Sydney Olympic Park stands to gain significantly from the Parramatta Light Rail investigations being undertaken by Parramatta City Council. Advancement of the Carter Street UAP adds further viability to this project and therefore corridors for light rail should be preserved.

### *Public Transport*

Justification for the Carter Street UAP relies heavily on the Sydney Olympic Park train line for connection to public transport. A lack of direct services to and from the Olympic Park train station, all services currently require connection at Lidcombe, results in rail being an unattractive transport option for many users, this is a criticism by current businesses and residents. Unless direct services to and from major centres, such as the City and Parramatta, are provided from the Olympic Park train station it is highly unlikely future residents of the Carter Street UAP will see the train line as a desirable form of public transport.

Buses, particularly to Strathfield station, are likely to be the main public transport option for the residents of Carter Street UAP, without direct rail services. Consideration should be given to establishing dedicated bus lanes from Carter Street UAP/Sydney Olympic Park to Strathfield station.

## **5. Infrastructure**

There are a range of potential infrastructure duplications between the Carter Street UAP and Sydney Olympic Park, such as streets, traffic management, and community facilities e.g. library. Effective dialogue will need to be undertaken between the lead agency/developer of the Carter Street UAP and the Authority to ensure infrastructure is delivered in a coordinated, responsible and timely manner and with funding determined.

## **6. Stormwater Management**

Government Agencies, and more recently the Authority, have undertaken significant rehabilitation of Haslams Creek Channel and as such treatment of stormwater to a high standard prior to it entering Haslams Creek is required.

Stormwater management diagrams, within the exhibited documents, shows bioswales and wetland treatment systems for the central and northern parts of the precinct. There appears to be no specific controls provided south of Carter Street (including the roadway), and west of Hill Road (including the roadway), with flows generated in these parts of the precinct going direct to Haslams Creek without treatment. The stormwater management controls should be extended to address the entire UAP, to improve the quality and quantity of stormwater discharged to Haslams Creek.

The proposal includes widening the existing concrete stormwater channel that traverses the site (west of Hill Road) and replacing it with a wider gabion-lined structure and

landscape feature. Design of this feature should include installation and maintenance of a stormwater litter boom or other devices to capture the significant volumes of gross pollutants that are generated upstream and to keep them from entering Haslams Creek. The maintenance arrangements will need to be factored into any planned modification of this structure.


## **Conclusion**

The above comments are provided to assist the process of development within the Carter Street precinct through the UAP process, whilst maintaining Sydney Olympic Park objectives under the Sydney Olympic Park Authority Act and Master Plan 2030, in particular its capacity as Australia's premier sporting, entertainment and recreation precinct.

The Authority is happy to assist and work with the Department to provide further advice and information where it is required on the matters raised.

Please contact me on 9714 7356 should you require any further assistance.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Alan Marsh', written in a cursive style.

**Alan Marsh**  
**Chief Executive Officer**