

SUBMISSION

PUBLIC EXHIBITION

CARTER ST URBAN ACTIVATION PRECINCT

EXECUTIVE SUMMARY

Council appreciates the opportunity to comment on the exhibition of the proposed Carter Street Urban Activation Precinct (UAP). It is acknowledged that this exhibition follows a number of meetings with a Council working group, at which various issues were discussed. Some of the key issues in this submission have previously been raised by Council. In other cases, the exhibition gives Council the opportunity to view a number of more detailed reports for the first time, so many of the detailed comments have not previously been raised through the working group.

Council supports a number of key aspects of the proposal. The inclusion of a primary school, community facilities and a new local centre to provide for the new residential area is supported. The retention of employment lands adjoining the M4 Motorway is also supported, as it recognises the role this land can continue to play, not only in providing jobs, but also in contributing to the productivity of this LGA.

However, the planning for the Carter Street UAP needs to address the very low level of infrastructure available to support the local communities north of Parramatta Road within Auburn LGA. More information is also required to enable the development of a contributions plan. This will also require the involvement of SOPA.

Council requests that the proposed 578m² community facility be increased to 1,000m² to meet the needs of the Carter Street community. The proposed increase in size is based on best practice and a dwelling occupancy rate that recognises the high average household size in Auburn LGA. The proposed timing of the school and sharing of facilities are also significant issues.

While there is extensive public open space within Sydney Olympic Park and Bicentennial Park, the spaces are regional spaces, designed to cater to large crowds rather than for local use and generally not within easy walking distance of Carter St. The UAP therefore needs to provide adequate public open space within the precinct. However, the proposed local public open space is inadequate for the number of residents and workers, both as an aggregate, and in the size, adaptability and diversity of the spaces. Council would prefer that open space within the UAP be designed as an integral part of the precinct and not unreasonably impeded by water quality management and drainage functions.

Transport infrastructure is of major concern. A regional approach to this issue needs to be developed, to include transport management for all communities north of Parramatta Rd. A cap on development may be required if certain infrastructure, such as light rail, is not established. In addition, some aspects of the proposal rely on assumptions which are either not supported in the documentation, not yet determined, or have no commitment or funding allocation.

Key amenity concerns relate to odour impacts from the Liquid Waste Treatment Plant, especially given the lack of certainty about the timing of its relocation; to noise from events at Sydney Olympic Park; and to the limited on-site parking required within the precinct. Council, opposes any residential development in the area until the nearby waste facility has ceased operations and the V8 Supercar race event is no longer held nearby.

These key concerns and other matters, such as sustainability, built form, staging, economic feasibility, contamination and DCP matters are detailed in the main part of the submission.

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A. KEY ASPECTS OF THE PROPOSAL SUPPORTED BY COUNCIL

There are a number of positive aspects of the proposed Carter Street Urban Activation Precinct, as proposed.

1. COMMUNITY FACILITIES

The inclusion of a primary school within the precinct is strongly supported, as the local schools are at or over capacity.

Council also supports the current proposed location of the community facility opposite the new village park at the intersection of Uhrig St as it will have a strong presence in a prominent location, enhance the civic area, have good visual and physical access, and access to open space to ensure the facility's users are 'part of the community'.

An alternative location for a multi-purpose community centre adjoining the Village Square (No. 2 in Figure 19 of the Planning Report) could also be supported. This would allow the facilities to contribute more directly to urban vitality, local identity and sense of place, and become an important focal point and gathering place for the community. Facilities located next to civic squares provide opportunities for markets, festivals and similar events. It can enhance utilisation, flexibility of use and provide opportunities for a wider range of community building activities.

The need for at least two child care centres, identified in the planning report, is supported. The acknowledgement that this may increase depending on the employment within the precinct is practical.

2. NEW CENTRE

The B2 Local Centre zoning for the new centre along Uhrig Rd is supported. The zoning will allow for the development of appropriate retail and other centre based services, with shop top housing above. It is noted that this includes tourist and visitor accommodation, which is appropriate for this location.

The incorporation of a plaza (village square) is supported, as is the proposed design of the new Uhrig Street.

3. EMPLOYMENT LANDS

The retention of these lands for large floor plate employment purposes was supported in the Hill PDA Employment Lands Study, 2008 for their significant contribution to local jobs and as part of the cluster of bulky goods, showroom facilities and light industries along the Parramatta Road corridor.

The B6 Enterprise Corridor zoning will allow these uses to continue, with the flexibility to incorporate office uses as the market changes. The B6 zoning is supported as is the retention of the current FSR of 1.5:1.

4. SUSTAINABILITY AND DESIGN

From a sustainability perspective, Council strongly supports the Water Sensitive Urban Design measures proposed and their incorporation as design and open space elements within the UAP landscape.

Council also applauds the requirement to engage an ESD consultant as a key member of design teams, as is required for development within the Sydney Olympic Park site.

Council also strongly supports the requirement for residential development to comply with *State Environmental Planning Policy (SEPP) 65* and the *Residential Flat Design Code*.

B. KEY CONCERNS

There are however a number of aspects of the proposed urban activation precinct which raise serious concerns, not just for the future residents, workers and visitors of this precinct, but for the future of developed areas to the north of Parramatta Rd and the region generally.

1. COMMUNITY FACILITIES

a. Size of community centre

The assumption that the average occupancy rate of the dwellings will be 2.1 people per dwelling has significant outcomes for the assessment of the capacity of the existing infrastructure to cater to the proposed development and the requirements for additional infrastructure for the precinct and surrounds.

While the occupancy rates on which these estimates are based vary from 2.0 - 2.2 (Wentworth Point) to 2.3 (Rhodes), this estimate does not take into account the existing demographics of this LGA. Auburn LGA currently has an occupancy rate of 3.15 persons per dwelling, one of the highest in the state.

Wentworth Point is not considered directly comparable as its location next to the bay, Parramatta River and the Millenium Parklands, combined with the distance to the station, means that it is less likely to be affordable/practical for a range of families.

On the other hand the Carter St precinct adjoins the M4 motorway, existing industrial uses, noisy facilities such as the Olympic stadium, and if not relocated – the liquid waste facility. It also has better access to a railway station (though for much of the precinct, still at over a kilometre away). This is likely to result in a very different demographic than Wentworth Point and a different occupancy rate is likely.

It is suggested that a better comparison would be Rhodes and Newington, rather than Pymont and Zetland which are both so close to the CBD and therefore have a different demographic. From Elton (2013) the occupancy rate for Rhodes is 2.3. From the 2011 census, the occupancy rate for Newington is 2.56 people per dwelling. An appropriate occupancy rate is likely to be somewhere between these examples. We suggest an occupancy rate for planning purposes of 2.4 people per dwelling. Applying the occupancy rate of 2.4 persons per dwelling, 5,500 dwellings would result in a resident population of 13,200.

Applying the occupancy rate of 2.4 persons per dwelling, 5,500 dwellings would result in a resident population of 13,200. The resultant need for community facilities would be 660m² (using 0.05m² per person as recommended in the Heather Nesbitt study¹ for areas with incoming population).

However, as noted by Elton Consulting, this does not take into account the needs of workers in the area. Neither does it consider potential synergies with the Haslam Precinct in the Sydney Olympic Park redevelopment masterplan. A larger community facility is required.

¹ Heather Nesbitt Planning (March 2007) *Community Facility Needs Assessment and Development Study* Prepared for Auburn Council

As a local comparison in relation to the size of the facility relative to the population, the community facility at Newington, which also adjoins employment lands, is much larger than that proposed for Carter St, relative to the resident population (see Table 1 below).

Table 1.

	Population	Size of community facility m ²	Size(gross floor area) per person
Carter St proposal	13,442	578 (Elton) / 660 (as above)	0.05
Newington	5,316	512	0.096

There are no commonly adopted standards for community centre provision in NSW. There is no minimum or standard catchment population size that triggers the need for a community centre and no ideal scale or size for a facility. Standards do provide some guidance to determine order of magnitude requirements for community centres.

Indicative standards have been developed for the type and size of community facility relative to the population catchment in a number of different situations in various parts of Australia. There are wide discrepancies between the standards proposed, and no universal agreement as to appropriate levels of provision.

Table 2 gives other examples outside Auburn LGA of the gross floor area standards/ provision for community centres.

Table 2.

AREA/POLICY	Size (gross floor area) for population approx. 13,000	Size(gross floor area) per person
Camden (NSW)¹	546m ²	0.042 m ²
Hills Shire (NSW)²	1,040m ²	0.08 m ²
Queensland Government: Implementation Guideline for Social Infrastructure Planning³	800 – 1,000m ²	0.08 – 0.1 m ²
City of Playford: Asset Management Plan (SA)⁴	1,131m ²	0.087m ²
Rhodes (Canada Bay, NSW) – new facility⁵	1,850m ²	0.132 – 0.154m ²

Notes to Table 2

1. 42m² per 1,000 persons. Land requirements are 2.5 times the GFA.
2. 80m² per 1,000 persons
3. 600-800m² per 6,000 - 10,000 persons; 1,000m² per 20,000 to 50,000 persons
4. 87m² per 1,000 persons
5. For a population of 12,000 to 14,000 persons, Rhodes will have a multi-purpose centre of 1850m². Of this, 360m² is for e-resource (e-library, study area); 50m² digital training/creative room; 270 - 400m², café/restaurant. If these areas were to be excluded from the calculation, this would leave a facility of 1,040 to 1,170m². It is understood that this is mostly funded through a VPA which includes \$13million (of the required \$16 million) for this facility. The VPA also provides for open space and other matters.

Based on a population of 13,200, a multi-purpose community centre for the Carter Street UAP of a minimum of 1,000m² GFA would be appropriate. This is also supported by Council's *Draft Community Facilities Strategy* which specifies a minimum size of 1,000m² for any future multipurpose community facility.

b. Indoor Recreation Centre

As discussed under *Public Open Space*, the extent range and type of public spaces and parks indicated and the embellishments proposed will not deliver a sufficient diversity of local leisure and recreation opportunities for the precinct population.

One way to address this issue, in part, would be the provision of a multi-purpose Indoor Recreation Centre for the Carter Street precinct for example, within the proposed B6 zone. The incorporation of such a facility would support both organised and unstructured activities (see discussion of trends and research in relation to recreational activity in Appendix 1).

A feasibility study undertaken for Council around 2008 identified the potential need within the region for the following:

- Upgraded aquatic facilities;
- A sporting precinct;
- A medium size gym (1200 -1500m²);
- A 5 court indoor sports hall;
- Synthetic pitches for both training and recreation;
- Social facilities, flexible meeting and activity space.

A number of these facilities are to be provided within Wyatt Park, between Church St and Olympic Dr Lidcombe. However, the 5 court indoor sports hall cannot be provided there. Wyatt Park currently has 3 courts in an older structure. The need for two additional courts was identified at the time. Since then, there has been continued population growth and the Carter Street development (with its projected population) was not under consideration.

A multipurpose facility with flexibility for a number of uses would typically comprise two to four multi-use courts, activity spaces, function/meeting room, change rooms, office space, crèche, café/kitchen and foyer. A four court centre is recommended, rather than a two court centre, as the population since the feasibility study, especially north of Parramatta Rd, has substantially increased, and with the urban activation precincts, will continue to do so.

The Centre could accommodate a wide range of sport, recreation and wellbeing activities including team sports, exercise and fitness programs, and other community group pursuits.

While Indoor Recreation Centres are generally standalone, it is preferable for these to be co-located with other multi-purpose community facilities and 'wet' facilities such as aquatic centres where possible. The adaptive re-use of an existing industrial structure is an option that could be explored.

c. Timing of community centre

Council's preference is for the community facility to be provided in Phase 1 of the development to support the important community development role of facilitating community connections amongst new residents, providing information and activating the new neighbourhood.

Should the community facility not be brought forward, Council recommends that a temporary shopfront or space be provided to house this function.

d. Strata title vs stand alone

A stand alone facility is preferred. If the facility were to be provided at the ground floor of a residential flat building and strata titled, the future incorporated association would have the ability to compromise the use of the facility and future changes that may be required in the best interests of the community. If this is not possible, clarification is required about how this issue will be addressed.

e. Community programs and service considerations

The appointment of a community development worker, as recommended by Elton Consulting is supported. Past experience has shown that where the developer appoints the worker, the worker may not have the required expertise or experience. Therefore funding for the worker and for place management/ welcoming programs should be provided to Council. Council can then appoint and supervise the worker and programs, and after funding is expended, carry on the program in a form appropriate to the evolution of the precinct. Funding for 3 years would be appropriate.

Funding requested for Community Development Officer (3 years, full time) salary, on- costs and funding for local programs and events (in 2013 dollars):

Year 1: \$112, 863 [\$79,033 (salary) + \$13,830 (on costs) +\$20,000 for programs and events]
Year 2: \$112, 863 [\$79,033 (salary) + \$13,830 (on costs) +\$20,000 for programs and events]
Year 3: \$102, 863 [\$79,033 (salary) + \$13,830 (on costs) +\$10,000 for programs and events]
TOTAL = \$328,589

The Community Development Officer will work with local residents, the Carter Street Precinct business community, government bodies, community organisations, and networks to build connections and a sense of community within the new Carter Street Precinct. Council would require funds to employ a highly skilled individual to join the Community Development Unit and to develop and coordinate a range of place-based community projects and events to improve the level of connection, engagement, resourcefulness, participation and skills in the community and also establish a range of programs and services within the new community facility.

A library kiosk will not be required for the Carter St precinct as the district library at Wentworth Point will serve this community.

f. Need for schools

Based on the proposed dwelling numbers it is understood that there would be a need for 2 primary schools and 0.8 of a high school (assuming the following standards used for growth centres):

- 1 primary school for 2,500 dwellings (at 2 hectares co-located with open space, or 3 hectares otherwise)
- 1 high school for 7,000 dwellings (at 6 hectares). It is understood that the Department of Education and Communities is investigating the potential for high school site to service the residential areas of Newington, Wentworth Point, Olympic Park and Carter St.

Local primary and high schools are at or over capacity, and cannot accommodate students from the future UAP. The situation is particularly critical for high schools, and until a high school is being constructed in the area, further residential development at this scale should be put on hold.

g. Size of school

The *Community Facilities Study* recommends at least a 2 hectare primary school co-located with open space. However, the open space provided by the proposal does not include any sports fields and the Hill Rd Park is unsuitable for school use, as outlined below.

It is not possible from the information provided to ascertain the size of the block within which the possible location for the school is shown. The school site should be at least 3 hectares, containing its own outdoor open space.

h. Location of school

The proposed location of the school on Hill Rd has not been considered in the *Transport Impact Assessment*. While it is acknowledged that the school location shown is indicative only, this issue needs to be addressed at this early planning stage.

The location of the school must be such that any traffic congestion during start and finish times does not spill onto Hill Road or Carter Street. Therefore the street frontage of the school should not be on Carter Street or Hill Road.

A more appropriate location for the school would be away from Hill Rd and closer to the centre.

i. School zoning

When the site is finalised for the school, an SP2 zoning should be applied. This gives greater certainty both to the developer and the community.

j. Timing of school

The school needs to be up and running very early in the development of the UAP, given that most of the residential development likely to be in place by the end of phase 2, that is, by 2021.

k. Facility sharing

The *Community Facility Study* recommends sharing the school hall for community use. Council does not support this as:

- It is dependent on the individual principal, and therefore uncertain;
- It does not allow for hall use during school hours;
- In this area halls are booked out on weekends for language schools – it would create a conflict on weekends between private language school use and community uses.

Similarly, Council does not support the sharing of the main Hill Rd Park with the school as it will constrain more active open space recreation activities by the resident population. Further, the use of the park for stormwater detention would limit the school's use. The curriculum should not be interrupted or compromised because the main part of the park is under water in the event of heavy rainfall.

l. Recommendations

It is recommended:

- i. that an occupancy rate of 2.4 persons per dwelling and the resultant population estimate be used in the assessment of the need for open space and for community facilities, and in the traffic and transport assessment;
- ii. that a single stand alone community facility be provided in the current proposed location at the intersection of Uhrig Street and the town square, or alternatively adjoining the Village Square:
 - at ground level
 - with equitable access
 - designed to enhance and integrate with the civic area
 - with access to open space and a fenced play area (dependent on location)
 - with space types as per the recommendations of Elton Consulting;
- iii. that the facility be provided at the same time as the first phase of residential development;
- iv. should the community facility not be provided early in this phase, that a temporary shopfront or space be provided to house this function;

- v. that the community facility have a minimum GFA of 1,000m²;
- vi. that the final size be determined in accordance with the final expected dwelling numbers, an occupancy rate of 2.4 people per dwelling, job numbers, the results of consultation with SOPA regarding the Haslam's Precinct and the specifications of Council's *Draft Community Facilities Strategy*;
- vii. that a multi-purpose Indoor Recreation Facility (of a four court scale) be considered within the precinct, possibly as an adaptive reuse within the B6 zone;
- viii. that total funding of \$328,589 be provided by the developer to Council for a period of 3 years for a community development worker.

It is recommended:

- ix. that a 3 hectare site, away from Hill Rd and closer to the centre, be set aside for (and dedicated to) the Department of Education and Communities for use as a primary school;
- x. that the site be zoned SP2 Infrastructure;
- xi. that the school be operational as early as possible in the life of the development, but at least by the beginning of Phase 2 of the project;
- xii. that a revised Traffic Impact Assessment consider the impact of the location of the school;
- xiii. that the proposal not rely on the community sharing the use of a school hall;
- xiv. that the school site have its own open space areas/playing fields;
- xv. that the beginning of construction for new residential development be contingent on the beginning of construction of a new high school within the broader area (eg on SOPA land).

2. PUBLIC OPEN SPACE

a. Aggregate Open Space Provision

The aggregate public space allocation (Figure 19, Planning Report) in the form of one large park, 3 small local neighbourhood parks and one civic plaza represents 4.2ha or 14% of the total residential site area (30ha), which is inadequate by comparison with other similar residential developments and well below best practice standards. Similar developments include the Wentworth Point UAP (27% of the residential area), Rhodes (18% excluding foreshore), Harold Park (35%) and Victoria Park (30%).

The proposal would result in 4,400 people for each of the 3 neighbourhood parks, or roughly about 0.15ha per 1,000 persons (1.5m² per person). It is noted that the Greenfields benchmark is 2.83 hectares per 1,000 persons, which, for the proposed population of Carter St precinct, would be around 37.3 hectares. While this is clearly not feasible in this location, the extent of open space should be significantly increased.

Another benchmark commonly used is a rate of one neighbourhood recreation park per 1,000 - 1,500 residents². This would result in 7 parks. The number of local neighbourhood parks provided (being 3) is comparatively low for the intended population.

A typical neighbourhood recreation park should be at least 5,000 m² to cater to a range of uses (ULDA November 2011).

Looking at other recent higher density redevelopments, Rhodes has 5 larger local parks for a similar total population while Victoria Park, Zetland has 3 larger local parks for half the Carter Street population.

Best practice for primary open space is from 0.5 to 1.1 hectares per 1,000 people (Urban Land Development Authority (ULDA) November 2011). Given the relative isolation of the site from other local scale parks, provision of open space at the higher end of the scale is warranted.

It is strongly recommended that the public open space provision be increased to 25% of the residential site area, spread across a number of larger parks.

Given the low levels of open space allocations within the Carter St precinct, there may also be potential to redesign some of the spaces near Edwin Flack Ave to provide parks/public spaces with a more local or intimate feel. The spaces currently within the Olympic Precinct are at an event scale, too open for likely use by local residents.

b. Types of Open Space

The range and type of public spaces proposed and the embellishments identified will not deliver a sufficient diversity of leisure and recreation opportunities for the whole population.

The open space network proposed for the precinct lacks a distinctive hierarchy and diversity of active and passive public and open spaces suitable for individual and group activities, including festivals, events, organised sports and quiet reflection.

In this high density development there will be limited private open space and therefore a greater reliance on the public open space to meet residents' varied recreational needs. The current

² For example: *Park planning and design - ULDA (Queensland) guideline no. 12* November 2011 sets out the Urban Land Development Authority (ULDA) objectives, planning principles and standards for the provision and design of parks in Urban Development Areas (UDAs) in Queensland.

proposal provides for a variety of small areas of open space at various locations throughout the precinct. This is unsatisfactory because:

- i. the cost to Council of maintaining small or narrow areas of open space is proportionately much higher than the cost of maintaining fewer but larger areas;
- ii. by their very nature, small areas of open space are less adaptable to a variety of community uses.

As such, these spaces will be unable to be dedicated to Council.

Children's playground(s) are likely to be a focal point for the community and therefore should be high quality, district standard facilities, which are able to retain children's interest over a longer period and provide them with a variety of stimulating experiences. This should take priority over the principle of equitable walking distance.

Provision should be made within the precinct for an off leash dog area. The nearest off leash area is not within reasonable walking distance for Carter Street residents.

Sports fields will also be required for this community. The community has consistently sought upgrades to the two fields at Wilson Park. Council is currently negotiating long term tenure with SOPA for the two fields. However, these fields are inadequate to support a population increase of this scale, together with population increases proposed at Wentworth Point. Provision of sports fields for this new community needs to be addressed.

c. Specific Public Spaces

i. MAIN HILL RD PARK (NO.1 IN FIGURE 19 OF THE PLANNING REPORT)

A new 1.8 hectare park is to be developed at Hill Road that provides for a variety of experiences, recreational activities, and stormwater management functions and establishes a green link to the Haslams Creek corridor. The establishment of this park is supported.

However, as the only large scale park/open space within the precinct, this park cannot provide the required diversity of active and passive recreational opportunities for the intended future population. The primary purpose of the main park appears to be stormwater management. Its secondary purpose appears to be recreation. The stormwater management functions, while also providing for aesthetic and some passive recreational opportunities, nevertheless limits the range of potential recreational opportunities.

Council's ability to maintain the park would be limited and the standard of embellishment relatively low. For instance the detention area could not support a children's playground.

Use of the park as a key resource by the primary school is not supported. The school should have sufficient open space within its own perimeter for curricular and extracurricular activities. School use of the Carter Street public open space would have a detrimental effect on resident recreational opportunities.

ii. UHRIG RD VILLAGE PARK (NO. 2 IN FIGURE 19 OF THE PLANNING REPORT)

The location of a village park at the intersection of Uhrig Road and Carter Street as the termination of Dawn Fraser Avenue is supported. The incorporation of artworks, water elements and multi-purpose spaces for passive recreation and public gathering such as markets (Figure 2 in the large format document) is also supported.

However, as shown Figure 19, a substantial portion is proposed to be dedicated to stormwater management as shown at Figure 13 in the DCP. The size and water management functions will constrain high quality diversity, multi-facility and amenity options.

Given the limitations of the Hill Rd Park discussed above, the opportunity should be taken to enlarge this park by the addition of a neighbouring block, providing not only additional space, but opportunities to improve the diversity of facilities and spaces. The location at the centre of the precinct is ideal for the creation of the primary open space for the precinct.

It is acknowledged that this would reduce the overall development yield of the site, however, as noted above, the precinct requires additional local open space for the size of the proposed population. While acknowledging the facilities within Sydney Olympic Park and Bicentennial Park, these facilities have a state and regional catchment. They are seen by local residents (eg Newington residents) as too crowded for local use.

iii. HILL RD RESERVE (NO. 3 ON FIGURE 19 OF THE PLANNING REPORT)

The Hill Rd Reserve is adversely affected by a number of easements with the result that its value as open space is greatly diminished. The easements make the site unsuitable for major refurbishment and embellishment (see Appendix 2).

The reserve is also in a location that is affected by a number of factors including heavy traffic, noise, poor access and lack of parking and therefore is unsuitable for passive recreation and/ or children's play. Further, it will also be impacted by the proposed new M4 on ramp from Hill Rd.

Dependent on the design of the M4 on ramp, the site may however, have some potential for public art, at the entrance to the precinct.

While the RE1 zoning is supported, the reserve will have very limited usefulness as public open space and is therefore not considered to be open space in a functional sense by Council.

iv. VILLAGE SQUARE (NO. 4 ON FIGURE 19 OF THE PLANNING REPORT)

The inclusion of a square or plaza is supported.

Consideration should be given to expanding the open space function of the Village Square with an adjacent additional park by linking it to an expanded Village Park (No. 2 in Figure 19).

Comments on this square are also provided below under Part 3.3 of the DCP.

v. HASLAM'S CREEK FORESHORE RESERVE (NO. 8 IN FIGURE 19 OF THE PLANNING REPORT)

If possible, this bank of the creek should be rehabilitated to the extent practical, and appropriate planting incorporated between the bank and the pedestrian/cycleway. The planning report (p. 27) states that a 20m wide landscaped public reserve is proposed, however, the large format document, shows a total 10m width including a shareway. No widths are specified in the DCP, however, it is understood that the 10m width is intended.

The width of the riparian area on the northern/western side of Haslam's Creek varies, but is usually at least 40m from the top of the bank to the closest development. On the whole, the shareway is also set back over 10m from the creek bank.

The foreshore park should be considerably widened for those lots that would still retain development potential. Final widths should be determined in consultation with the Office of Water to ensure improvements in water quality, habitat and connectivity.

See also comments re connectivity across the creek at e).

vi. OPEN SPACE STRIP TO THE SOUTH OF THE SWIRES SITE

The proposed RE1 – Public Recreation zone adjoining the M4 to the south of the Swires site also extremely narrow, and will have little to no function as open space, while its management will be expensive, in comparison to larger parks. Its only benefit will be a landscaped buffer to the residential development and a more appropriate zoning would be the same as the adjoining development, namely R4 – High Density Residential.

d. Quality of the Public Domain

Council is concerned that the overall and future quality of the public domain will not be consistently constructed and maintained as it will be compromised by ad hoc and un-coordinated development stages resulting from multiple developer design and construct projects. The varying functions and facilities of each public space and public connections between them need to be designed within the framework of the overall precinct and beyond.

To ensure high quality of landscaping and restoration, the entire precinct requires a comprehensive, fully costed and staged Landscape Master Plan and Public Domain Plan supported by adequate funding to ensure compliance by future development. It is recommended that this be required with the lodgement of the first DA for the site, in the same way as discussed for the Public Art Strategy.

e. Access to Additional Off-Site Open Space - to Diversify and Increase Recreational Opportunities

Given the low levels of open space allocations within the precinct, the future resident and working population should have improved access to existing parks and open spaces within the Sydney Olympic Park area – along the south-eastern foreshore of Haslams Creek as proposed, but also along the western (Newington) side, and within the existing public domain areas on the northern side of Edwin Flack Avenue.

i. **Haslams Creek Walking Trails**

It is strongly recommended that the proposed public access along the southern bank of Haslams Creek (Element 8 Figure 19 and Figures 21,22) link beyond John Wing Parade, to provide an extended walking trail circuit across Haslams Creek to the Newington side, thereby providing an extended return walking circuit for both the Carter Street and Newington communities. This is particularly important in light of research on trails and trail users, which shows that there is a shift to unstructured activities, and that trails are increasingly popular as they offer opportunities for low cost unstructured activities, and social and health benefits (physical and mental) for a wide range of people, but especially for women (see Appendix 1). The crossing at John Wing Pde should also be upgraded to provide pedestrian access.

These improvements would also allow improved pedestrian and cycle access to the facilities in Newington. The link across will be especially important in the short term, prior to the construction of facilities such as the primary school and the main park.

ii. **Scope of the Haslams Creek Trail Improvement Project**

This proposal contains several objectives focusing on existing and future trails and their relationship to the natural environment. The implementation of this works program will contribute to these objectives by providing a framework for:

- improvement of the natural and built environment and promotion of community awareness and participation;

- an environmental management strategy for future cultural activities and assets;
- good quality open space that responds to community needs and attracts use;
- the improvement of biodiversity for existing natural areas;
- active and passive recreation opportunities combined with biodiversity throughout the area's urban rivers, parklands and river reserves.

f. Recommendations

It is recommended:

- i. that the public open space provision be increased to 25% of the residential site area, spread across a number of larger parks;
- ii. that there be a hierarchy of open spaces, but each park should be a minimum of 5,000m² unless there are particular circumstances that would prevent this. The size and diversity of the parks should take priority over providing equidistant walking catchments;
- iii. that the provision of sports fields for this new community be addressed;
- iv. that consideration be given to the potential to redesign space/parks near Edwin Flack Ave in Sydney Olympic Park, to provide parks/public spaces with a more local or intimate character;
- v. that the parks within the Carter St precinct provide a diversity of recreational opportunities, character and spaces;
- vi. that children's playground(s) be high quality, district standard facilities, which are able to retain children's interest over a longer period and provide them with a variety of stimulating experiences;
- vii. that an off leash dog area be provided within the precinct;
- viii. that the opportunity be taken to enlarge the Village Park by the addition of a neighbouring block, providing not only additional space, but opportunities to improve the diversity of facilities and spaces;
- ix. that the main Hill Rd Park not be shared with the school;
- x. that the Hill Rd reserve not be included in any calculation of the extent of public open space;
- xi. that the southern bank of Haslam's creek be rehabilitated to the extent practical, and appropriate planting incorporated along the bank and between the bank and the pedestrian/cycleway;
- xii. that the foreshore reserve along Haslam's Creek be widened where possible, with the final widths and design the developed in consultation with the Office of Water;
- xiii. that the strip to the south of the Swires site proposed to be zoned RE1, be zoned R4 High Density Residential instead;
- xiv. that a comprehensive, fully costed and staged Landscape Master Plan and Public Domain Plan, supported by adequate funding, be required with the submission of the first stage DA;
- xv. that the proposed public access along the southern bank of Haslams Creek be extended to link up with the trail beyond John Wing Parade, that the John Wing Pde crossing be upgraded to include pedestrian access, and that the potential for an extended walking trail circuit across Haslams Creek to the Newington side be developed, that addresses the objectives outlined in e.ii) above.

3. TRANSPORT and ACCESS

a. Need for a regional approach

The Transport Impact Assessment notes that redevelopment within the Homebush Bay subregion is “reliant on access to these regional roads through five gateway intersections” (page 43) which include:

- **M4 Motorway ramps at Hill Rd**
- **Parramatta Rd / Hill Rd**
- **Parramatta Rd / Birnie Ave**
- Homebush Bay Dr and Australia Ave
- Silverwater Road and Holker St

However, only three of these intersections (bolded above) have been investigated by this study. It is recommended that a broader traffic study be undertaken by the department to identify the impacts that development being facilitated by the State government at Wentworth Point, Carter Street and Sydney Olympic Park will have on the traffic network, and how the impacts can be addressed.

It is critical that any proposed changes to the road design or configuration be incorporated into the model and tested prior to any rezoning of the precinct.

b. Impact on intersections

The Transport Impact Assessment indicates that the Carter St UAP will have manageable impacts on the road network at 2031 (excluding Hill Rd/Parramatta Rd and Birnie Ave/Parramatta Rd intersections). However, this hinges on some key assumptions, including that:

- The package of intersection upgrades outlined in the report is implemented;
- Only 111,000m² or 65% of employment GFA will be developed (although the proposed controls would permit 170,783m²).

Council is concerned about the possibility of more than 111,000m² or 65% of employment gross floor area being developed on the site. This concern is partly because the assumption that only 65% of the development potential will be reached does not appear to be supported by the economic advice prepared by Jones Lang Lasalle or any other advice. If the take up of employment land is more than anticipated, it has not been modelled and is likely to result in unacceptable impacts on the road network. An approach should be developed to address a high growth scenario whereby more than 111,000m² or 65% of employment GFA is developed. This may need to include a cap/threshold on employment gross floor area. Council is mindful that a reduction in the overall development potential of the area proposed to be zoned B6 Enterprise Corridor may hinder the desired development outcome for the area, and would be reluctant for this to occur.

c. Connection to M4

The transport study needs to be amended following more certain information about the changes resulting from the WestConnex project. The proposed east-bound on-ramp to the M4 from Hill Rd is supported. An additional westbound off ramp is also sought.

Council wrote to the Minister for Roads in February 2014 to highlight this issue (see Appendix 3).

d. Assumed density

While the overall FSR of the residential and mixed use area of the Carter St UAP is proposed generally to be 2:1 (apart from close to Haslam's creek), it is unclear how the final FSRs will be calculated. The Transport Impact Assessment bases the residential and mixed use gross floor area (GFA) on an assumption that the FSR shown only applies to the development lots, not roads or parks.

An alternative interpretation may be that the final residential and mixed use GFA is calculated based on all of the land shown with an FSR on the relevant LEP map, including roads and parks. This would give a much higher FSR for each development site. A rough estimate indicates that the FSR per development site in the Carter St area of the UAP will be more than 2.7:1.

It is unclear which approach was used in the development of the concept plan. It is also unclear how the englobio approach will be interpreted by developers and Council staff when DAs are lodged.

The controls in the amendment to the LEP should specify the same interpretation of the FSR as the Transport Impact Assessment, namely that the final residential and mixed use GFA is based on an assumption that the FSR shown only applies to the total of the development lots, not roads or parks.

If this is not the interpretation used in the development of the concept plan (including heights) and therefore to be used to develop the provisions of the LEP amendment, then the traffic impact assessment has underestimated the amount of traffic and should be revised to reflect this.

e. Ownership of Roads

The submitted documents have not identified the proposed ownership of the road network. Some of these roads will have stormwater quality measures that may form part of the road. Council may accept the roads subject to further conditions. Please note that Council will not accept any 'Stratum Lot' roads.

f. Road alignments

It is understood that the alignment of Dawn Fraser Avenue and John Ian Wing Parade are fixed and cannot be changed, while other street alignments and the road network may change during the final design stages. If there is a dead end introduced in a road design due to the changes then a cul-de-sac design must be incorporated to allow a garbage truck to turn.

g. Parking

The proposed parking for commercial use and retail use are less than Council's requirements, as they use the requirements of the SOPA Masterplan 2030. The transport study recommends the lower rates to support the use of alternatives to the car. It also states that the success of such a measure would be reliant on a significant public transport scheme/dedicated public transport priority, essentially sufficient to provide for a 10% reduction in car driver mode share.

However, the developments within Sydney Olympic Park are much closer to the railway station, and therefore have a relatively convenient alternative to the use of the car. Public transport access for Carter St Precinct is far less convenient, with the proposed B6 zoned lands being between one and one and a half kilometres walking distance from the station, and the retail from 800m to a kilometre from the station.

Further, maximum parking rates are proposed for parking for all development types. This means that developments could provide no parking at all. This is inconsistent with the intent to provide at grade parking within the B6 zone to encourage redevelopment of these sites. It would also result in severe difficulties with on-street parking. Wentworth Point has low minimum parking

requirements, and severe parking problems, with people regularly parking in unsafe locations. This mistake should not be made again for Carter St.

In comparison, the situation for Carter St will be even worse, as the precinct is designated for Sydney Olympic Park event parking, which is proposed to be protected under public positive covenants.

If lower rates are proposed, they should be tied to the provision of alternative transport options. This would be consistent with the recommendations of the Parsons Brinkerhoff study. Such lower rates should be stated as a minimum. Where the parking rates refer to a floor area, gross floor area should be used for clarity and consistency.

An alternative option would be to provide a parking range, with the lower rates considered against the availability of alternate transport options.

h. Event parking

There will be significant parking issues created within the precinct during major sporting events. From a regulatory compliance (parking) perspective, Carter and Uhrig street are currently affected by special event parking restrictions and are commonly used by event patrons for cheap/free parking. Consideration needs to be given to the potential parking issues that will affect future residents during special events. An example of some of the issues that will occur can already be seen within the Newington residential areas which are significantly lower density further from the venues than the proposed new residential streets.

The transport study recommends that event parking in the precinct be relocated outside the precinct but, as acknowledged in the Planning Report, SOPA requires public positive covenants to ensure that event parking remains. The transport study should be amended to consider the impact of retaining the event parking, and propose appropriate mitigation, which would inform any future parking management plan.

i. Bus, cycle and walking

Council supports the target of reducing vehicular use by 10%, however, while the transport study refers to a light rail service in the future, the plan as it stands relies on some bus route changes, vague proposals for increasing some bus frequencies, reduced parking and some measures to support walking and cycling.

Bus priority within the precinct is supported, however, the bus routes are very indirect, and buses will still be caught up in the same traffic as cars. Further some of the precinct will be beyond the 400m considered to be a bus walking catchment while residents to the west of Hill Rd would need to cross Hill Rd to access the bus service. It is unrealistic to expect that workers or residents will switch modes to bus travel in any significant numbers. Traffic and parking estimates should not rely on the 10% target, unless light rail is provided.

The location of a bus stop within the new centre along Uhrig Rd would provide increased convenience for workers and shoppers, especially those with mobility impairments.

The two proposed shareways should each be 3m wide for safe travel in accordance with Austroads.

Street lighting along the walking and cycle routes, including along Hill Rd will also need to be addressed.

While bicycle facilities to the north of the M4 Motorway are of a high standard, facilities and connections between the Carter Street area and Lidcombe are poor due to the physical and psychological barriers imposed by the M4 Motorway and Parramatta Road. There is an

opportunity to improve these linkages as part of the UAP process by improving signage and road marking along Bombay St and Bachell Ave and the lighting for the crossings under the M4.

j. Staging

A new public transport line for Parramatta to Sydney Olympic Park/Carter Street is recommended following Phase 2. The staging plan in the traffic and transport plan shows about 50% the residential development and about 14% of the employment/commercial development occurring prior to Phase 3. Phases 3 and 4 should be dependent on a new public transport line.

The critical nature of the need for a significant new transport line is also highlighted by the employment study by Jones Lang LaSalle, which states that:

Transport linkages are critical to the feasibility of the precinct. (p2)

A requirement should be incorporated for any proposed development to have direct access to a public or private road. The staging plan (either in the DCP or the first DA) needs to include the consideration of the staging of roads, to ensure that roads and development will be completed in an orderly manner rather than in isolation.

The staging plan also shows that the connection to John Wing Pde will not take place till after 2027. This connection would considerably relieve congestion at the intersection of Carter St and Hill Rd and provide a more direct link to Newington Public School prior to the construction of the new school and should be brought forward. It is acknowledged that this will require the co-operation of SOPA.

See also comments above on the *Impact on Intersections*.

k. Recommendations

It is recommended:

- i. that a broader traffic study be undertaken by the department to identify the impacts that development being facilitated by the State government at Wentworth Point, Carter Street and Sydney Olympic Park will have on the traffic network, and how the impacts can be addressed;
- ii. that the transport study needs be amended following more certain information about the changes resulting from the WestConnex project;
- iii. that an approach be developed to address a high growth scenario whereby more than 111,000m² or 65% of employment GFA is developed. This may need to include a cap/threshold on employment gross floor area. Council is mindful that a reduction in the overall development potential of the area proposed to be zoned B6 Enterprise Corridor may hinder the desired development outcome for the area, and would be reluctant for this to occur;
- iv. that the controls in the amendment to the LEP specify the same interpretation of the FSR as the Transport Impact Assessment, namely that the final residential and mixed use gross floor area is based on an assumption that the FSR shown only applies to the total of the development lots, not roads or parks;
- v. that if the above interpretation is not to be reflected in the provisions of the amendment to the LEP, then the Transport Impact Assessment must be revised to reflect the alternative interpretation of the englobo FSR;
- vi. that any proposed changes to the road design or configuration resulting from i), ii), iii) and v) above be incorporated into the model and tested prior to any rezoning of the precinct;
- vii. that further discussion with council take place regarding the ownership of roads;
- viii. that any dead end road end in a cul de sac to allow for the turning of waste trucks;
- ix. that a west-bound on ramp to the M4 be provided;

- x. that the commercial parking rates be provided as a range, (a minimum and maximum), with the rates considered on merit against the availability of convenient alternate transport options;
- xi. that the parking rates be tied to gross floor area for clarity and consistency;
- xii. that the commercial parking rate ranges use the requirements of Auburn DCP as the maximum, and the SOPA rates as the minimum;
- xiii. that the residential parking rates be specified in the same way as Auburn DCP- a specific rate (not a maximum);
- xiv. that the transport study be amended to consider the impact of retaining the event parking, and propose appropriate mitigation;
- xv. that the pedestrian/cycle shareways be 3m wide;
- xvi. that the adequacy of street lighting on Hill Rd be considered;
- xvii. that a bus stop be located within the new centre along Uhrig Rd;
- xviii. that the cycle linkages be improved as part of the UAP process by improving signage and road marking along Bombay St and Bachell Ave and the lighting for the crossings under the M4;
- xix. that the staging plan identify committed and funded staging of roads, to ensure that roads and development will be completed in an orderly manner rather than in isolation;
- xx. that a requirement be incorporated for any proposed development to have immediate direct access to a public or private road;
- xxi. that Phases 3 and 4 be dependent on a new public transport line;
- xxii. that the connection to John Wing Pde be brought forward to the first phase of the development.

4. ODOUR

The Odour Impact Assessment states that Council has received only one complaint about odour from the Liquid Waste Treatment Plant. This is incorrect, although Council acknowledges this inaccuracy may have occurred as a result of a miscommunication by Council staff. The location is currently affected by numerous regular odour complaints (mainly from the Newington precinct), which are generally associated with the Liquid Waste Treatment Plant (LWTP). Not all reports are formally submitted to Council or the EPA but residents refer to frequent discussions about the issue between residents. However, recent formal written complaints include 3 days in November 2013, 3 days in December 2013, 2 days in February 2014 and one day in April 2014. Council has also received an email from a resident moving their family from Newington due to the odour issues.

The modelling outlined in the Odour Assessment report by Pacific Environment Ltd shows that in all scenarios except one, the operation of the LWTP will not meet the EPA criterion of 2 Odour Units. The report also states that the impact of this will be mitigated through the staged development of the precinct and future relocation of the LWTP and waste transfer site. Theoretically this appears to be acceptable, however in reality (current operation of the site) Council still continues to receive reports/complaints from Newington residents regarding odour from the LWTP site. These complaints are also referred to the NSW EPA who licence the site and have a current pollution reduction program condition on their licence. Further odour mitigation and impacts should be considered as part of this process.

Further, the Odour Impact Assessment is based on the assumption that the LWTP will be relocated prior to the later phases of the development as there is recognition of the land use conflict between residential development in some areas of the UAP and the LWTP. However, the Department of Planning and Infrastructure's *Planning Report* states that '*in the longer term, relocation of the Homebush Bay facility will be examined.*' This does not provide the necessary certainty for the community, for future residents or businesses.

Areas west of Hill Rd proposed for residential development are identified in Phase 1 and 2 in the staging plan, but are likely to be affected by unacceptable odour impacts from the LWTP under Scenario 4 – S851 Worst Case. Given the history of malfunctions of the plant, and the continuation of complaints, despite the installation of the new Odour Control Furnace in April 2013, it cannot be assumed that this scenario will not occur. These areas should not be redeveloped till the LWTP is relocated.

The proposal should specifically tie the redevelopment potential of the areas likely to be most affected by odour from the LWTP to the removal of the plant. A provision to this effect should be included in *Auburn LEP 2010* through the SEPP.

It is also noted that the odour model refers to odours at ground level. As the proposal is for structures catering for working and living environment within 4 to 20 storey structures, clarification is sought as to the likely odour impacts at higher levels (modelled if possible).

Under the pollution reduction program the operators are required to review and implement an odour management plan for the site, however this does not appear to have been considered as part of the assessment.

Based on the worst case scenario (Figure 7.4), 25% of the site is affected by 2 Odour units. However the majority of the site is affected by 1 Odour unit which it is understood will still be noticeable and may result in complaints regarding odour at the site.

Consideration should be given to requiring that future residents are notified of odour issues prior to purchase or lease.

a. Recommendations

It is recommended:

- i. that, as per Council's resolution at its Ordinary Meeting of Council of 21 May 2014, any residential development in the area proceed only after the nearby Liquid Waste Treatment Plant has ceased operations;
- ii. failing this:
 - that the staging plan ensure that areas likely to be most affected by unacceptable odour impacts (2 odour units) under any of the four modelled scenarios are in the last phase of development;
 - that the proposal specifically make the start of redevelopment of the areas within the UAP likely to be most affected by odour (2 odour units) from the LWTP, conditional on the removal of that facility, and that a provision to this effect be included in *Auburn LEP 2010* through the SEPP;
 - that the review and implementation of odour management plan required by the EPA be considered in an amended odour impact assessment prior to any rezoning;
 - that clarification be provided on the impact of odour from the LWTP and the Auburn Resource Recovery Centre at levels above ground, up to 20 storeys;
 - that further consideration regarding odour mitigation and impacts should be undertaken prior to any rezoning in light of the number and consistency of complaints; and
 - that future residents are notified of odour issues prior to purchase or lease.

5. NOISE

The proposal includes recommended noise criteria for internal noise and recommends certain façade treatments to reach these noise criteria. However based on the report provided, these calculations have been made on a category 2 event, rather than the worst case scenario. An example of a Category 1 event is the V8 supercar event, which is run over three days, though preparation takes months, involving significant road closures. Residents should not be expected to deal with up to 85dBA over a period of several days. It is suggested that the V8 supercar event be relocated to a more appropriate location, such as Eastern Creek.

Council also requests that the public positive covenant required in relation to living near Sydney Olympic Park include protection from complaints to Council as well as to SOPA.

It is noted that the maximum noise levels at the external façade of buildings for SOPA events is 85dBA. The potential for this noise level to occur has not been considered. Further there is no specified limit to the number or duration of Category 1 events that may be held at Sydney Olympic Park. Consideration should be given to designing to mitigate the maximum noise levels permitted under the SOPA Act.

It is also unclear if the recommended treatments are based on the final proposed layout or if it considers the staging of development of the site. This has the potential for the first buildings to be completed (with minimal attenuation) relying on the construction of future buildings to attenuate the noise. In this regard each building would need to incorporate an acoustic report relevant for buildings on the ground at the time of construction and looking at the worst case scenario.

The Wilkinson Murray report in section 5.5.4 suggests council could consider relaxation of the noise criterion given the project is next to the SOP entertainment precinct. Councils are always faced problems with noise where there is a commercial/residential interface. Therefore Council

takes the alternate view, namely, that we should take this opportunity to ensure the more stringent criteria are being met, so that buildings are appropriately attenuated to prevent/minimise noise complaints/issues in the future.

a. Recommendations

It is recommended:

- i. that the worst case scenario be used to guide the design of developments in the precinct;
- ii. that the V8 Supercar event be relocated to Eastern Creek;
- iii. that, as per Council's resolution at its Ordinary Meeting of Council of 21 May 2014, any residential development in the area proceed only if the V8 Supercar event no longer occurs at the Sydney Olympic Park site;
- iv. that the public positive covenant required in relation to noise from SOPA events include complaints to Council;
- v. that due to staging issues, an acoustic report be required for all buildings in the precinct, not just those closest to the source of the noise;
- vi. that consideration be given to designing to mitigate the maximum noise levels permitted under the SOPA Act (85dBA at the external façade);
- vii. that the noise criteria in Part 4.6 of the draft Carter St DCP be retained.

6. CONTRIBUTIONS PLANNING

To allow the preparation of a contributions plan for Carter St UAP community infrastructure, costing information in relation to a number of infrastructure items identified in Table 6 of the Planning Report is required.

Further discussion is also needed in relation to additional infrastructure required by the community but not identified in Table 6 of the Planning Report, including potential funding sources and indicative square metre costs. Additional infrastructure for discussion includes:

- on-going maintenance of the water quality works;
- more natural rehabilitation of Haslam's Creek;
- increased open space – eg village park at least double the size;
- sports fields (outside the UAP)
- an appropriate indoor recreation facility within the employment zone.

a. Recommendations

It is recommended:

- that the Department of Planning and Infrastructure provide the following information in relation to Table 6 in the Planning Report:
 - in relation to the local and regional traffic improvements (items 1-10) and item 13 - the relevant costs and apportionment rate for the range of sources, including State Government, Auburn Council, Sydney Olympic Park and developers (where it is understood that the total contribution required by the Carter St UAP would be about 31% of the total cost)
 - indicative costs for all other items funded in full or in part by the developer. There may be instances where the proposed level of provision is less than that sought by Council, and this information can provide the basis for further discussions and for the development of the contributions plan. For instance, Council may seek additional functions within the community centre;

- for item 18 - an indicative cost for a 1,000m² community facility.
- that further discussion take place in regard to additional infrastructure required by the community but not identified in table 6, including potential funding sources and indicative square metre costs.

C. OTHER MATTERS THAT NEED TO BE ADDRESSED

1. CONTAMINATION

The *Preliminary Site Investigation* by WSP does not cover the Goodman lands, the part of the precinct which is proposed to support the greatest extent of residential development. The planning report states that a preliminary contamination investigation for this area found the land suitable for multi-level residential development with basement car parking. However, the study has not been included in the supporting documentation. This study should be made public.

The WSP report concludes, for the part of the precinct investigated, that for rezoning:

Detailed Site Investigation involving intrusive soil and groundwater investigations is required to clarify the presence of any Contaminants of Potential Concern associated with current and historic activities identified during this investigation.

Apart from 2 sites identified as suitable for industrial/commercial uses, the WSP report does not state that the land is, or can be made suitable for the proposed uses, and therefore these detailed site investigations need to be carried out to enable a decision to be made as to the suitability prior to any rezoning of the precinct.

Ideally Remedial Action Plans would be undertaken at this stage however from a cost and practical sense this may be more suited to the subdivision and development stages of the development.

a. Recommendations

It is recommended:

- viii. that the preliminary site investigation for the Goodman lands (the entire northern part of the precinct) be released to Council and the public;
- ix. that the detailed site investigations recommended by WSP be carried out prior to any decision on the rezoning of the precinct;
- x. that, if possible, remedial action plans be developed prior to rezoning, or failing that, that they be required with the lodgement of the first development application – the Staging DA.

2. SUSTAINABILITY, DENSITY and BUILT FORM

a. Sustainability and Compliance with SEPP 65

To ensure that any development on the site is of high quality from a sustainability perspective, and to ensure that the ESD consultant to be engaged as part of the design team actually has the key role proposed, the DCP should:

- i. include a requirement for the ESD consultant to sign off on DA plans, in the same way as architects do under SEPP 65;
- ii. amend the requirement for commercial office buildings to meet 4.5 stars under NABERS, to a requirement to meet a minimum of 5 Green Stars under the Green Building Council

- of Australia's (GBCA) rating tool. NABERS deals with a much narrower range of criteria than GBCA, but these criteria are also covered by the GBCA. This would also be consistent with the requirements for development on the Olympic Park site; and
- iii. add requirements for other non-residential uses to meet a minimum 4 Star Green Star rating, as required under the Sydney Olympic Park Masterplan.
or alternatively,
 - iv. require a minimum 5 star Green star rating under the GBCA's pilot Communities rating tool. The Communities tool assesses a proposal against the following definition of a sustainable community in Australia: A community that:
 - *'Enhances liveability*
 - *Creates opportunities for economic prosperity*
 - *Fosters environmental responsibility*
 - *Embraces design excellence*
 - *Demonstrates visionary leadership and strong governance'*. (www.gbca.org.au)

In relation to compliance with SEPP 65, in many cases, it appears unlikely that the proposed residential flat buildings and shop top housing will be able to meet the requirements of the Residential Flat Design Code and therefore SEPP 65. The built form diagrams and shadow diagrams are too small for a reasonable assessment of the potential to comply with SEPP 65. However, it appears that:

- i. many of the communal open space areas are too small and are likely to be overshadowed for large portions of the day;
- ii. residential buildings in many cases appear to have inadequate separation and high overshadowing impacts.

Given that the site is seen, in part, as an extension of Sydney Olympic Park, it is instructive to compare the residential components under the *Sydney Olympic Park Masterplan 2030* with the proposed main residential areas in the Carter St UAP as shown in Figure 1.

As illustrated in Figure 1, the precinct close to the station, that is Central Precinct within the Olympic Park site, provides for greater variety in built form, larger communal open space areas, street setbacks and building separation, and more landscaped views from the street to break up the urban space, than the Carter St precinct, further from the station. This is partly as a result of the use of more open built forms in the Central Precinct, rather than the perimeter block forms in the UAP, partly to height differences and partly due to the difference in permitted residential density.

While residential developments will be required to comply with SEPP 65, allocating FSRs that cannot be achieved together with compliance with the SEPP will lead to unrealistic expectations of landholders and developers, potentially higher than necessary land prices, and will encourage the lodgement of non-compliant development applications.

The proposed setbacks, including upper storey setbacks on the east west streets, will not provide for a consistent streetscape, and will be too strongly dominated by the higher developments at the corners. The sites envisaged for the 7-8 storeys should have at least some setback along these streets except where ground floor commercial uses are proposed (the B2 zone). A consistent 4 storey street wall height along these streets would be more appropriate.

In addition, the only site without a street setback to the new street that runs beside the Hill St Park towards the new centre is the proposed landmark site which permits development up to 64m. Again, to support a consistent street character, the setback should be same as for the rest of the sites along the north-eastern side of the road, namely 4 m above 6 storeys. This would not prevent the design of an appropriate landmark structure.

No setbacks are shown in the Planning Report or the DCP for one of the residential sites along Carter St. The setbacks should continue to 1.5m and 3m regime of the rest of the street, with the zero setback to the north-east, as for the rest of that street.

b. Density

The distances to the railway station from the residential areas of the UAP are, for almost every dwelling, greater than a 'comfortable walking distance' to the station of 800m, both as commonly recognised, and as specifically acknowledged in the study. The proposed density and heights are very ambitious for a site that is mostly outside the walking catchment of a station.

Further, as outlined under the comments on traffic, the FSR as shown on the map is confusing. It is unclear whether the roads and parks should be included or excluded in the estimation of the overall gross floor area permitted on the site. Given the distance from a substantial centre or railway station, it is recommended that the density be based on the lower interpretation, that is, excluding the FSR shown on roads and parks.

c. Active uses

To ensure that the streets are activated in line with the intent of the proposal, the SEPP should amend Auburn LEP 2010 to add a clause on active uses, such as the one below used in other standard LEP instruments:

Ground floor development in business zones

- (1) *The objective of this clause is to ensure that active uses are provided at the street level in business zones to encourage the presence and movement of people.*
- (2) *This clause applies to land in the Zone B2 Local Centre. (This could be narrowed by map)*
- (3) *Development consent must not be granted to development for the purposes of commercial premises or to a mixed use development with a commercial premises component, or a change of use of a building to commercial premises, on land to which this clause applies unless the consent authority is satisfied that the ground floor of the building:*
 - (a) *will not be used for the purposes of residential accommodation or a car park or to provide ancillary car parking spaces, and*
 - (b) *will provide uses and building design elements that encourage interaction between the inside of the building and the external public areas adjoining the building.*
- (4) *Subclause (3) (b) does not apply to any part of a building that:*
 - (a) *faces a service lane that does not require active street frontages, or*
 - (b) *is used for 1 or more of the following purposes:*
 - (i) *a lobby for a commercial, residential, serviced apartment or hotel component of the building,*
 - (ii) *access for fire services,*
 - (iii) *vehicular access.*

d. Staging

The staging plan shows two residential areas to the west of Hill Rd to be available for redevelopment in phases 1 and 2, while all the nearby areas are within Phase 4. This would result in very isolated areas surrounded by existing industrial uses with potentially little connectivity to the new centre, open space or community facilities or bus stops.

e. Inconsistencies

Diagrams in the final DCP should be made internally consistent, and consistent with the proposed zonings. This includes for instance the diagram illustrating the built form for a high

density residential perimeter block (p9 of the large format document) which shows landmark residential and 8 storey buildings surrounding communal open space on the site on which the school is proposed.

The height of buildings plan shows proposed roads and the village square within the 64m height limit. This is likely to lead to proposals that are inconsistent with the structure plan, and should be amended.

The Planning Report (page 'x') states that key views to iconic buildings have been protected, and new views created from the proposed new pathway along Haslams Creek. However, there are 20 storey buildings proposed in the view line from the Haslam's Creek foreshore park to the Iconic buildings, and further, there are no provisions or objectives relating to views in the Draft DCP.

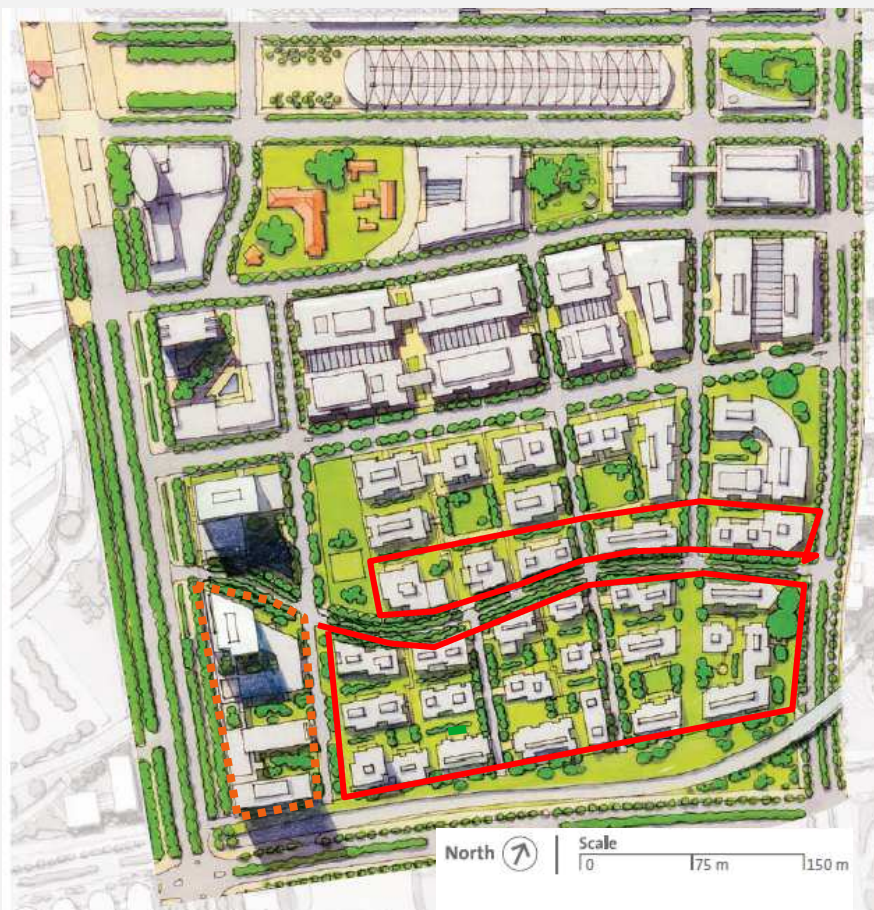
Figure 14 in the planning report shows a mixed use development in an area proposed to be purely residential. Neither does it appear to comply with the landscaped setback or 10m built setback requirements. This is misleading as it shows a more prominent built form than that sought under the DCP controls.



f. Recommendations

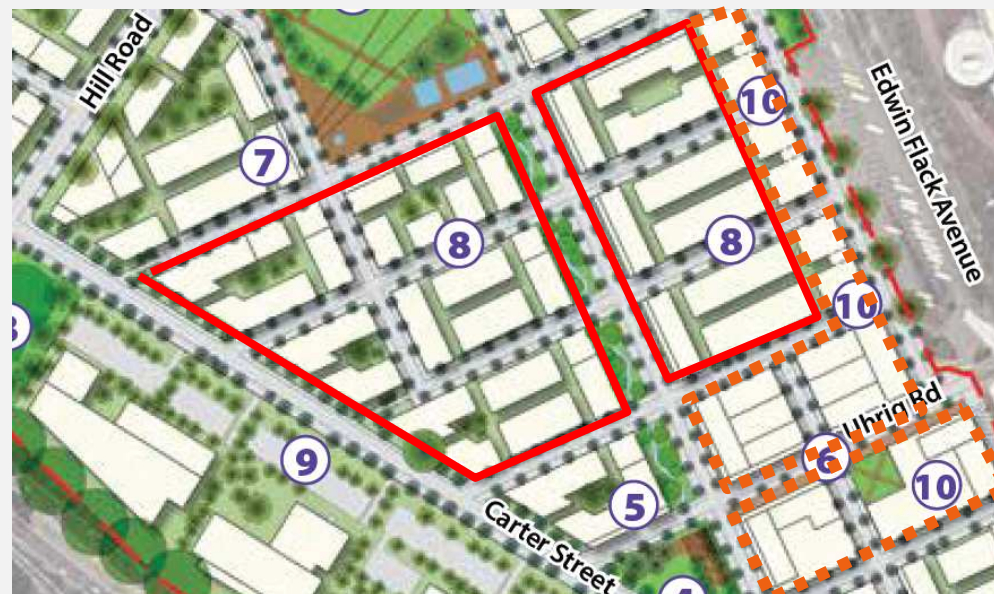
It is recommended:



- i. that the FSR provisions specified in the LEP amendment result in the lower interpretation of residential and mixed use density;
- ii. that the Department of Planning and Infrastructure prepare an urban design study to ascertain the ability of the proposal to meet SEPP 65, and if necessary amend the standards to enable compliance with the SEPP;
- iii. that more open built forms be adopted for the UAP, rather than perimeter block forms;
- iv. that all representative figures and diagrams are consistent with the provisions of the SEPP, the amendments to Auburn LEP 2010 and the associated DCP;
- v. that the height of buildings plan be amended to exclude from the 64m height limit areas designated in the indicative structure plan as roads or parks/square;
- vi. that midblock setbacks are extended to the corners along the residential zoned streets;
- vii. that the SEPP include a clause in *Auburn LEP 2010* requiring activation of the ground floor in the B2 zone;
- viii. that view lines from new pathway along Haslams Creek to the iconic Olympic Park structures be considered in the layout, built form and the DCP requirements;
- ix. that a requirement be included for the ESD consultant to sign off on DA plans, in the same way as architects do under SEPP 65;
- x. that non-residential development in the UAP be required to meet GBCA Green Star ratings of 4 stars (and 5 stars for office developments), or a similar rating under the pilot Community Rating Tool;
- xi. that the staging of the residential areas to the west of Hill Rd be moved to the last phase of the development.

Figure 1 Comparison of proposed residential development in Sydney Olympic Park and Carter St UAP.

Sydney Olympic Park Masterplan 2030 Central Precinct

 Residential
 Mixed Commercial and Residential

Carter St Urban Activation Precinct

 Residential
 Mixed Commercial and Residential

3. ECONOMIC FEASIBILITY

a. Costs and timing

The economic feasibility study states that the brief included a requirement to analyse the timing and impact of infrastructure costs. While timing is very briefly touched on, this information, vital to an understanding of the feasibility of the proposed uses, is lacking.

b. Phasing of retail

The proposed B2 zoning covers the Uhrig Rd centre and a northern strip of land opposite the 2 storey coach parking proposed by SOPA on Edwin Flack Ave. It is expected that the Uhrig Rd centre will support ground floor commercial and shop top housing.

However, it is unclear what types of uses are envisaged for the northern strip of land. It is noted that the Jones Lang LaSalle report states:

Demand for retail, community and local services will be driven by a local population within the precinct and will not be feasible until a permanent population is established.
(p2)

It is important that this northern strip not be able to compromise the viability of the Uhrig Rd centre. It is recommended that the staging plan (in the DCP or in the first DA) require the relevant part of this northern B2 strip to occur in Phase 2, after the development of the Uhrig Rd centre, which would still allow these buildings to serve as noise buffers to the adjoining residential blocks. If increased residential development is sought within Phase 1 this could be allocated to the far eastern corner, currently shown as Phase 4. This would also be more consistent with the staging recommendations of the *Odour Assessment* by Pacific Environment Limited.

An additional option may be to limit the floor plate of any supermarket in this strip, which is not accessible from Uhrig St, to that of a small corner store size.

The Jones Lang LaSalle study recommends the careful timing of retail uses - too early would affect viability, while too late would impact the viability of other uses. Clarification is sought as to the levels of retail that could be supported for each phase of the project, and whether the advice of Jones Lang LaSalle was used in developing the staging plan.

c. Recommendations

It is recommended:

- i. that the economic assessment of the draft staging plan, including the timing and cost of infrastructure and public transport service improvements, be conducted prior to any rezoning;
- ii. that the staging plan be amended to move the parts of the B2 strip that do not have access from Uhrig Rd to Phase 2, to ensure the Uhrig Rd centre is not compromised.

4. WATER MANAGEMENT

a. Flooding

The supporting documentation has not identified the flooding impact due to the local catchment within Carter Street and the 3 x 1800mm diameter pipes traversing through the properties known as 16-18 Carter Street and 29-33 Carter Street. The localised flood level on Carter Street will be higher than the existing Carter St level and higher than the 4.0m AHD minimum floor height recommended in this area.

b. On site detention

Figure 13 in the DCP shows two detention basins within the parks. It is not clear whether these basins will be adequate to cater for the whole precinct. A full water management study should be prepared and considered prior to any rezoning. Failing this, it should be submitted with the first stage DA.

A staging plan is also required for stormwater management. It is noted that the main water treatment and detention facilities (Hill Rd Park) are not to be provided until Phase 4 of the proposal. For any common detention basin that is intended to support development, but has not yet been constructed, a temporary detention facility should be required as part of every development proposal until the full operation of the common detention basins. These matters should be addressed in the water management study outlined above.

c. Recommendations

It is recommended:

- i. that discussions with Council include the contribution towards the maintenance of stormwater quality measures on land to be dedicated to Council;
- ii. that a full stormwater management study be completed prior to any rezoning of the site;
- iii. that the stormwater management measures be included within the staging plan and the staging identified in the water management study
- iv. that the design in relation to flooding recognise the higher flood levels resulting from the pipes through 16-18 and 29-33 Carter St and the topography of the precinct in this vicinity.

5. CHILD CARE CENTRES

It is recommended:

- i. that the two centres provide for 70 spaces each, to cater for a proportion of the people working within the precinct;
- ii. that appropriate planning mechanisms are put in place to enable child care centres within the precinct;
- iii. that a child care centre be co-located with the community facility near the village centre and dedicated to Council. Council can then run the facility or lease it out to a child care provider;
- iv. that a potential second location, that can comply with relevant standards and controls, be identified, following the first phase of the development.

6. STAGING

A number of staging issues have been raised in this submission. It is essential that all aspects of the staging of the development be considered very carefully up front. This will help to ensure that services, infrastructure and facilities are available as required, that adverse impacts can be minimised and that development will be promoted and co-ordinated in an orderly and economic manner, as per the objects of Part 5 of the *Environmental Planning and Assessment Act 1979*.

To this end, a full staging plan should be lodged as the first DA for the precinct. If this is not possible due to ownership patterns, the staging plan should be included in the DCP.

a. Recommendations

It is recommended that a full staging plan be lodged as the first DA for the precinct. It must:

- i. cover the entire precinct, and beyond as required;
- ii. show the location and timing for each phase for at least the following:
 - a. Development areas/lots;
 - b. Road, cycle and pedestrian network;
 - c. Primary school development;
 - d. Transport infrastructure and service upgrades (both road and public transport);
 - e. Community facilities and public open space;
 - f. Stormwater management measures;
 - g. Remediation works;
 - h. Public domain and landscape works;
 - i. Public art works;
- iii. be consistent with Auburn LEP 2010, the DCP; public domain plan, water management plan, landscape master plan and public art strategy;
- iv. outline the impacts of the proposed staging (including odour, noise, isolation) and alternatives considered;
- v. include evidence of funding or construction commitments, where relevant.

It is recommended that should such a DA not be possible due to patterns of land ownership, an amended staging plan as outlined above be incorporated within the DCP.

7. LEP MAPPING

The Height of Building and Floor Space Ratio maps included in the proposal are incorrect for the lands outside the Carter St Urban Activation Precinct.

a. Recommendation

It is recommended that the following map tiles be updated for the lands outside the Carter St Urban Activation Precinct with the latest amendment to Auburn LEP 2010, which was notified on 11 March 2014, and any subsequent amendments made prior to the making of the SEPP for the precinct:

- Height of Building
- Floor Space Ratio

8. DEVELOPMENT CONTROL PLAN

<i>Carter Street Draft DCP</i>	Comments
<i>Relationship to Auburn DCP 2010</i>	The planning report states that the DCP will be incorporated within Auburn DCP 2010. The structure and wording of the new DCP will form part of Auburn DCP 2010. The structure and wording of the DCP will need to be adjusted accordingly.
<i>Wording</i>	It is important that the wording be as tight as possible. A DCP is by its nature, a flexible plan, where changes are considered on merit against the objectives, but adding terms such as ' <i>generally</i> ' (eg 'generally consistent with') makes it so flexible, that the relevant control is much more difficult to enforce.
<i>Part 2</i>	
<i>2.3 Indicative structure plan</i>	Control 2 requires a number of matters to be addressed with the first DA for part of the site. It is recommended that an additional control be inserted prior the above control, requiring that the first DA lodged should be a staging plan as outlined in C6 above. Changes are sought to the indicative structure plan as outlined in this submission.
<i>Part 3</i>	
<i>3.1 Street Network and Design</i>	The transport study by Parsons Brinkerhoff outlines the potential for widening of Carter St and new intersections. A section and plan, similar to those for the new streets, should also be included for Carter St, in accordance with the final outcomes of the transport studies. The objectives should include the creation/retention of views of iconic structures in Sydney Olympic Park. Control 9 requires a Public Domain Plan to be prepared and submitted. This should be required for the entire precinct with the first DA- the staging DA for the precinct. The plan should also be required to address all relevant matters in the DCP and integrate with the public art strategy and the landscape masterplan, and staging plan.

Carter Street Draft DCP	Comments
3.2 Pedestrian and cycle network	It is unclear whether the dotted lines on the indicative structure plan and Figure 8 linking new streets to Carter St are mainly stormwater overflow areas, or also pedestrian/cycle access ways. There is no explanation of what is meant by 'minor links' in Figure 8.
3.3 Open Space Network	
<p><i>a. To provide a range of quality public spaces to support new residential and employment uses, including parks, civic squares and places for community gatherings and events.</i></p>	<p>The objective is supported.</p> <p>However, as explained above, the quality of the public spaces will be constrained by the limited size of each park and its edge conditions.</p> <p>See also comments under <i>Public Open Space</i>.</p> <p>Controls are sought in relation to the quality, accessibility and amenity of public spaces – eg:</p> <p><i>Public spaces are to:</i></p> <ul style="list-style-type: none"> • <i>be defined with a consistent palette of high-quality and durable materials and are given variety through planting, colour and texture;</i> • <i>assist in activating the street and the ground floor of buildings;</i> • <i>maximise the linkages between destinations and be integrated with the circulation network;</i> • <i>cater for pedestrians;</i> • <i>be safe and accessible;</i> • <i>have a high level of amenity, and include outdoor seating, shading, and public art;</i> • <i>be enjoyable at night with appropriate lighting effects that define use and are welcoming.</i> <p>It is important that a control be included to require minimum sizes for new public open space areas and a minimum overall area – eg. 25% of the precinct. (See also comments under <i>Public Open Space</i>).</p>

Carter Street Draft DCP	Comments
<p><i>Additional objective</i></p>	<p>An additional objective relating to diversity is sought, eg:</p> <p><i>To provide an open space and facility network with a diverse range of settings and opportunities that cater for the varied recreational needs of residents and visitors of all ages and abilities.</i></p> <p>Additional controls are required to ensure that diversity is addressed at all levels of planning and design:</p> <ul style="list-style-type: none"> • At the broad network level, park settings are to range across the spectrum from natural and semi-natural places to highly modified areas for organised sports. • Parks are to be located and designed to highlight significant local features such as waterways, hills and ridgelines. • Parks are to provide a variety of settings and opportunities for formal sports and active and passive recreational opportunities. • Parks that are primarily for sports activities should also include informal recreation opportunities to cater for diverse user groups. • Children's playgrounds are to be high quality, district standard facilities, which are able to retain children's interest over a longer period and provide them with a variety of stimulating experiences. This should take priority over the principle of equitable walking distance.
<p><i>b. To ensure that open space complements and integrates with the open space network within Sydney Olympic Park.</i></p>	<p>The DCP should provide details of improved accessibility to the open space network within Sydney Olympic Park. A proposed extension of the foreshore park to connect to the foreshore walkway to the north of Ian Wing Pde should be shown on Figure 9 in this part, and in the indicative structure plan at Figure 2 (similar to the proposed pedestrian/cycle access shown on Figure 8 through this area).</p> <p>It also needs to be recognised that the role and scale of the open space network within the Carter Street precinct - to support the future residential population - will be of a more local and comparatively intimate and cozy scale and character to that existing within the adjacent Sydney Olympic Park precinct.</p>
<p><i>c. To improve the amenity, facilities and usage of existing parks and spaces.</i></p>	<p>Clarification is requested within the text in relation to which existing parks and facilities this refers to. Does it refer to links to Haslams Creek walking trails? Or to SOPA facilities (covered by objective b)? Or to the Hill Rd reserve on Carter/Hill, which has little potential for any amenity and does not adjoin the residential areas?</p> <p>See also comments under <i>Public Open Space</i> above.</p>

Carter Street Draft DCP	Comments
<p><i>d. To provide high quality landscaping of existing and new public open space to cater for passive recreation for residents and workers.</i></p>	<p>Council is concerned that the overall and future quality of the public domain will not be consistently constructed or maintained and may be compromised by ad hoc and un-coordinated development stages resulting from multiple developer design and construct projects (See comments under <i>Public Open Space d.</i>)</p> <p>To ensure a high quality public open space network, the DCP should require the submission of a comprehensive, fully costed and staged Landscape Master Plan (LMP) for the entire precinct at the stage of the first stage DA. It needs to be supported by adequate funding to ensure compliance by future development.</p> <p>Objectives for the LMP should include:</p> <ul style="list-style-type: none"> • the precinct's public landscape incorporates high quality features and spaces which benefit the community and create a sense of identity and ownership for the residents and workers who live in or visit the precinct; • high standards of amenity in landscaping treatments will be delivered and maintained whilst also achieving water conservation objectives; • a consistent landscaping image is created via a suite of landscaping elements which combine to brand the precinct as unique and inviting; • landscape design, amenity and public art concepts for landscaping elements will create a unique image for the precinct and will be incorporated into various public open spaces. This will include water-wise concepts, feature plants, hard-stand, artwork, lighting and built forms; • an image for the precinct and entry points of high visibility that demonstrate the use of colour and indigenous species; • more opportunities for passive recreational pursuits in public open space and 'natural' wetland/bushland ecosystems; • increased active and passive recreational opportunities within attractive and functional landscapes incorporating expanses of irrigated turf, maintained native garden beds and rehabilitation/creation of more natural wetland/bushland areas; • an effective response to the issue of climate change through measures such as: <ul style="list-style-type: none"> ○ reducing overall water consumption patterns; ○ provision of shade; ○ consideration of life cycle costs of materials; ○ low energy use in the public domain areas; ○ consideration of passive heating and cooling within buildings adjoining the public domain, as a result of

Carter Street Draft DCP	Comments
	<p>larger landscape elements (eg deciduous vs evergreen trees)</p> <ul style="list-style-type: none"> • attractive created landscapes and maintained native garden beds around key community facilities; • attractive and functional streetscapes i.e. verges and medians; • integration of public art with building and landscape design.
<p><i>e. To contribute to the management of stormwater and enhancement of ecological values.</i></p>	<p>This matter should also be addressed in the Landscape Master Plan.</p> <p>The objectives for the LMP should also include the incorporation of water sensitive urban design to:</p> <ul style="list-style-type: none"> • integrate the precinct-wide water treatment systems; • use water management to prescribe the character of the living plant material used on the site; • link water movement to pedestrian circulation making it more legible to residents and users of the precinct; • integrate water strategies in the development of buildings, streetscapes and landscapes, and facilitate good management and maintenance.
<p><i>f. To provide public access along Haslams Creek and the construction of a southern bank to Haslams Creek, south of John Ian Wing Parade.</i></p>	<p>The DCP should require the design of the public accessway along the southern bank of Haslam's Creek to facilitate connection to an extension north of John Ian Wing Parade and across to the Newington side to support higher levels of recreational walking opportunities for the future Carter St population (see Appendix 1) (See also comments under <i>Public Open Space e.</i>)</p> <p>Following consultation with the Office of Water, the DCP should include controls in relation to:</p> <ul style="list-style-type: none"> • the naturalization of the creek edges; • the minimum width of any development (including footpaths/cycleways) from the bank; • the minimum width of the pedestrian/cycleway to be provided. The shareway should be at least 3m wide in accordance with the requirements of Austroads and the same width as the shareway on the opposite side of Haslam's Creek; • the minimum setback from the edge of the shareway to the boundary of the private lots.
<p><i>g. To provide opportunities for collaboration between artists and designers in the development of creative, innovative, memorable, integrated and sustainable public</i></p>	<p>The objective is supported.</p> <p>The Australian Institute of Landscape Architecture (AILA) advocates the role which public art can play in successful urban design, place making and development of social and cultural capital. The AILA encourages all levels of government and those agencies involved with the planning, design and management of the public realm to embrace site appropriate, contextual public art of cultural and environmental significance that is embedded in</p>

Carter Street Draft DCP	Comments
art	<p>the design process.</p> <p>Council supports the AILA National Policy Statement on Public Art and Landscape - Key Factors:</p> <p><i>Opportunities for the incorporation of public art should be integrated from the outset and through subsequent planning and concept stages of relevant landscape architecture projects.</i></p> <p><i>Relevant contractual arrangements should reflect artwork budgets and include appropriate professional fees for the artists to enhance the delivery of quality outcomes.</i></p> <p><i>Clients and landscape architects should collectively ensure that qualified professional public art curators and consultants are engaged to manage artwork opportunities and appropriate commissioning processes.</i></p> <p><i>Public art projects require collaboration and negotiations between the landscape architect, other professionals and the artists concerning the respective roles and responsibilities of each party.</i></p> <p><i>As with all collaborating professionals, the artist's intellectual property needs to be appropriately attributed in feature articles, awards and promotional material.</i></p> <p><i>Professionals and clients involved with public art need to be aware of and conversant with relevant state or local government policies and city planning obligations relating to public art.</i></p> <p><i>Artists should be allowed to express their creativity and contribute positively to the overall design process and not be constrained by overly prescriptive briefs.</i></p> <p>The public art strategy should be integrated with the public domain + landscape design vision + public art master plan for the whole precinct. A collaboration guideline for public artists should be included in the strategy.</p> <p>A requirement to appoint a public art project manager is also recommended.</p>
Control 4. A village square of 600 – 900m ² is to be included within the Uhrig Road activity centre as a central meeting place.	<p>It is suggested that the control be amended to read:</p> <p><i>A village square of 600 – 900m² is to be included within the Uhrig Road activity centre, designed:</i></p> <ul style="list-style-type: none"> <i>• as a focal point and gathering place for the community;</i> <i>• to have civic quality and an inviting high quality public domain, that encourages interaction;</i> <i>• to be accessible to all members of the community;</i> <i>• is surrounded by a variety of uses, encouraging different groups of users at different times of the day.</i>

Carter Street Draft DCP	Comments
<p><i>Control 6. A detailed Public Art Strategy is to be prepared and submitted with any development application which includes public domain areas.</i></p>	<p>Council does not support an ad-hoc public art delivery process driven by individual developers on a project by project basis.</p> <p>Accordingly, control 6 should be amended to require the preparation and submission of a detailed public art strategy for the entire precinct with the first application for subdivision.</p> <p>Note this approach has also been taken for the DCP for the Wentworth Point UAP.</p> <p>The strategy should also be required to:</p> <ul style="list-style-type: none"> • be integrated with the Landscape Masterplan and Public Domain Plan; • include the involvement of public artists and a guideline for collaboration; • address the requirements of this DCP.
Part 4	
<p>4.3 Building Design and Setbacks</p>	<p>The legend to Figure 12 shows a ground level 4m setback, but this is obscured on the plan.</p> <p>A residential setback to the M4 should also be shown for the far western (residential zoned) triangle of the precinct, in the same way as the residential setback for the far eastern site.</p> <p>As noted under the section on built form, no setbacks are shown in Figure 12 for one of the residential sites along Carter St. The setbacks should continue to 1.5m and 3m regime of the rest of the street, with the zero setback to the north-east, as for the rest of that street.</p> <p>See also comments on setbacks at <i>Sustainability, Density and Built Form</i>.</p> <p>With such a large area owned by a single landowner, it is important that there is a good mix in the design of buildings, both from a point of view of housing choice, and from the perspective of the streetscape. It is recommended that the DCP include requirements:</p> <ul style="list-style-type: none"> • for different architects to design buildings within, say, 150m of each other; • for façade designs to be different at least every 30m (the point at which buildings are required to break up the length of the façade).

Carter Street Draft DCP	Comments
<i>Part 4.5 Vehicular access and car parking</i>	<ul style="list-style-type: none"> • Clause 4.5 (11) regarding car share parking – The DCP should clarify whether car sharing spaces provided are to be included in the calculation of resident car parking spaces OR whether it is to be additional to required resident parking spaces. • Parameters should be specified to guide the determination of the number of car sharing spaces ‘appropriate’ for a particular development • The DCP should consider the provision of motorbike parking spaces within residential developments • Where parking rates refer to a floor area, gross floor area should be used for clarity and consistency.
<i>4.6 Acoustic Assessment</i>	<ul style="list-style-type: none"> • The objectives and controls should make it clear that it also applies to schools and the impact on students; • The controls in Table 4 should specify the noise measure, eg: dBA 40 LAeq, 15 min; • This section should include a requirement to use a combination of measures, where possible, which will minimize noise, but still allow for natural ventilation. Part 4 of the SOPA Masterplan has an example: <i>Wherever practicable, residential developments shall be sited, orientated and treated to mitigate noise and maximise natural ventilation while avoiding the use of air conditioning.</i> • The Wilkinson Murray Noise Impact Assessment (p11) states that the design of developments in the precinct needs to take account of the potential for low-frequency (63Hz and 125Hz frequencies) noise impacts, such as from dance parties. A control should be included in this regard.
<i>4.8 Sydney Olympic Park event impacts</i>	The public positive covenant required in relation to noise from SOPA events should also protect Council from complaints or actions.
<i>Affordable housing and housing mix</i>	Given that the Carter St precinct is seen as ‘support[ing] the broader of the Olympic Park Specialised Precinct’ (Planning Report page viii), it is recommended that relevant requirements from the SOPA Masterplan be adopted. The SOPA Masterplan requires a minimum of 3% of dwellings to be ‘affordable’ (Part 4. 6.17 – 6). A similar requirement would be appropriate for the Carter St precinct.

Carter Street Draft DCP	Comments
	<p>Part 4.6.17 of the SOPA Masterplan also provides for a mix of apartment sizes as follows:</p> <p><i>Apartment Mix</i></p> <p><i>To create a vibrant and self sustaining community with housing suitable for many life stages:</i></p> <p><i>7. Provide the following quantities of apartment types to all residential and mixed use developments:</i> <i>a minimum of 15 per cent studio or one bedroom apartments a minimum of 15 per cent of three or more bedroom apartments for developments less than nine storeys high, maximise the number of three bedroom apartments at ground floor level with direct access to open space suitable for family use.</i></p> <p>It is recommended that this control also be included in the Carter St precinct DCP.</p> <p>The size of units being constructed at Wentworth Point have been reducing over time. Recent applications seek units almost exclusively between 42m² and 87m². This does not provide for a good demographic mix. It is recommended that the DCP include a requirement for a proportion of units to be at least 100m² to encourage families.</p>
Part 6	
6.1 Sustainability	The traffic study identifies ways of encouraging travel behaviour change, such as a transport package, workplace travel plans etc. It is recommended that the DCP include provisions requiring the recommended measures.
6.3 Stormwater	Control 1 should be modified to add a requirement that the stormwater management plan comply with the provisions of the Stormwater Drainage section of <i>Auburn DCP 2010</i> .

D. SUMMARY OF RECOMMENDATIONS

For convenience, a summary of the above recommendations is provided below.

It is recommended:

Community facilities

1. that an occupancy rate of 2.4 persons per dwelling and the resultant population estimate be used in the assessment of the need for community facilities;
2. that a single stand alone community facility be provided in the current proposed location at the intersection of Uhrig Street and the town square, or alternatively adjoining the Village Square:
 - at ground level
 - with equitable access
 - designed to enhance and integrate with the civic area
 - with access to open space and a fenced play area (dependent on location)
 - with space types as per the recommendations of Elton Consulting;
3. that the facility be provided at the same time as the first phase of residential development;
4. should the community facility not be provided early in this phase, that a temporary shopfront or space be provided to house this function;
5. that the community facility have a minimum GFA of 1,000m²;
6. that the final size be determined in accordance with the final expected dwelling numbers, an occupancy rate of 2.4 people per dwelling, job numbers, the results of consultation with SOPA regarding the Haslam's Precinct and the specifications of Councils Draft Community Facilities Strategy;
7. that a multi-purpose Indoor Recreation Facility (of a four court scale) be provided within the precinct, with a preference for co-location with other community facilities;
8. that total funding of \$328,589 be provided by the developer to Council for a period of 3 years for a community development worker.

School

9. that a 3 hectare site, away from Hill Rd and closer to the centre, be set aside for (and dedicated to) the Department of Education and Communities for use as a primary school;
10. that the site be zoned SP2 Infrastructure;
11. that the school be operational by the beginning of Phase 2 of the project;
12. that a revised Traffic Impact Assessment consider the impact of the location of the school;
13. that the proposal not rely on the community sharing the use of a school hall;
14. that the school site have its own open space areas/playing fields;
15. that the beginning of construction for new residential development be contingent on the beginning of construction of a new high school within the broader area (eg on SOPA land).

Public open space

16. that the public open space provision be increased to 25% of the residential site area, spread across a number of larger parks;
17. that there be a hierarchy of open spaces, but each park should be a minimum of 5,000m² unless there are particular circumstances that would prevent this. The size and diversity of the parks should take priority over providing equidistant walking catchments;
18. that the provision of sports fields for this new community be addressed;
19. that consideration be given to the potential to redesign space/parks near Edwin Flack Ave in Sydney Olympic Park, to provide parks/public spaces with a more local or intimate character;

20. that the parks provide a diversity of recreational opportunities, character and spaces;
21. that children's playground(s) be high quality, district standard facilities, which are able to retain children's interest over a longer period and provide them with a variety of stimulating experiences;
22. that an off leash dog area be provided within the precinct;
23. that the opportunity be taken to enlarge the Village Park by the addition of a neighbouring block, providing not only additional space, but opportunities to improve the diversity of facilities and spaces;
24. that the main Hill Rd Park not be shared with the school;
25. that the Hill Rd reserve not be included in any calculation of the extent of public open space;
26. that the relevant widths and design standards are developed in consultation with the Office of Water;
27. that the southern bank of Haslam's creek be rehabilitated to the extent practical, and appropriate planting incorporated along the bank and between the bank and the pedestrian/cycleway;
28. that the foreshore reserve along Haslam's Creek be widened where possible, with the final widths and design to be developed in consultation with the Office of Water;
29. that the strip to the south of the Swires site proposed to be zoned RE1, be zoned R4 High Density Residential instead;
30. that the shareway along the southern bank of Haslam's Creek be at least 3m wide;
31. that a comprehensive, fully costed and staged Landscape Master Plan and Public Domain Plan, supported by adequate funding, is required with the submission of the first DA for subdivision of the precinct;
32. that the proposed public access along the southern bank of Haslams Creek be extended beyond John Wing Parade, and include an extended walking trail circuit across Haslams Creek to the Newington side, that addresses the objectives outlined in *Public Open Space* within this submission.

Transport and Access

33. that the final transport impact assessment be amended to use an occupancy rate of 2.4 people per dwelling;
34. that further discussion with council take place regarding the ownership of roads;
35. that any dead end road end in a cul de sac to allow for the turning of waste trucks;
36. that the traffic model incorporate traffic generated by the Urban Activation Proposal in Wentworth Point as Hill Road is the main access to Wentworth Point;
37. that any proposed changes to the road design or configuration resulting from the modelling be incorporated prior to any rezoning of the precinct;
38. that a west-bound on ramp to the M4 be provided;
39. that the pedestrian/cycle shareways be 3m wide in accordance with the requirements of Austroads;
40. that the adequacy of street lighting on Hill Rd be considered;
41. that a bus stop be located within the new centre along Uhrig Rd;
42. that the staging plan include the consideration of the staging of roads, to ensure that roads and development will be completed in an orderly manner rather than in isolation.
43. that a requirement be incorporated for any proposed development to have immediate direct access to a public or private road;
44. that Phases 3 and 4 be dependent on a new public transport line, such as light rail;
45. that the connection to John Wing Pde be brought forward to the first phase of the staging plan.

Parking

46. that the commercial parking rates be provided as a range, (a minimum and maximum), with the rates considered on merit against the availability of convenient alternate transport options;
47. that the parking rates be tied to gross floor area for clarity and consistency;
48. that the commercial parking rate ranges use the requirements of Auburn DCP as the maximum, and the SOPA rates as the minimum;
49. that the residential parking rates be specified in the same way as Auburn DCP- a specific rate (not a maximum);
50. that the transport study be amended to consider the impact of retaining the event parking, and propose appropriate mitigation.

Odour

51. that, as per Council's resolution at its Ordinary Meeting of Council of 21 May 2014, any residential development in the area proceed only after the nearby Liquid Waste Treatment Plant has ceased operations;
52. failing this:
 - that the staging plan ensure that areas likely to be most affected by unacceptable odour impacts (2 odour units) under any of the four modelled scenarios are in the last phase of development;
 - that the proposal specifically make the start of redevelopment of the areas within the UAP likely to be most affected by odour (2 odour units) from the LWTP, conditional on the removal of that facility, and that a provision to this effect be included in *Auburn LEP 2010* through the SEPP;
 - that the review and implementation of odour management plan required by the EPA be considered in an amended odour impact assessment prior to any rezoning;
 - that clarification be provided on the impact of odour from the LWTP and the Auburn Resource Recovery Centre at levels above ground, up to 20 storeys;
 - that further consideration regarding odour mitigation and impacts should be undertaken prior to any rezoning in light of the number and consistency of complaints; and
 - that future residents are notified of odour issues prior to purchase or lease.

Noise

53. that the worst case scenario be used to guide the design of developments in the precinct;
54. that the V8 Supercar event be relocated to Eastern Creek;
55. that, as per Council's resolution at its Ordinary Meeting of Council of 21 May 2014, any residential development in the area proceed only if the V8 Supercar event no longer occurs at the Sydney Olympic Park site;
56. that the public positive covenant required in relation to noise from SOPA events include complaints to Council;
57. that due to staging issues, an acoustic report be required for all buildings in the precinct, not just those closest to the source of the noise, unless the construction of the barrier buildings can be guaranteed prior to the buildings to which they form a noise barrier;
58. that consideration be given to designing to mitigate the maximum noise levels permitted under the SOPA Act (80dBA at the external façade);
59. that the noise criteria in Part 4.6 of the DCP be retained.

Contributions planning

60. that the Department of Planning and Infrastructure provide the following information in relation to Table 6 in the Planning Report:
 - in relation to the local and regional traffic improvements (items 1-10) and item 13 - the relevant costs and apportionment rate for the range of sources, including State Government, Auburn Council, Sydney Olympic Park and developers (where it is understood that the total contribution required by the Carter St UAP would be about 31% of the total cost)

- indicative costs for all other items funded in full or in part by the developer. There may be instances where the proposed level of provision is less than that sought by Council, and this information can provide the basis for further discussions and for the development of the contributions plan;
 - for item 18 - an indicative cost for a 1,000m² community facility;
61. that further discussion take place in regard to additional infrastructure required by the community but not identified in table 6, including potential funding sources and indicative square metre costs.

Contamination

62. that the preliminary site investigation for the Goodman lands (the entire northern part of the precinct) be made public;
63. that the detailed site investigations recommended by WSP be carried out prior to any decision on the rezoning of the precinct;
64. that, if possible, remedial action plans be developed prior to rezoning, or failing that, that they be required with the lodgement of the first development application for the site.

Sustainability, density and amenity

65. that the Department of Planning and Infrastructure prepare an urban design study to ascertain the ability of the proposal to meet SEPP 65, and if necessary amend the standards to enable compliance with the SEPP;
66. that more open built forms be adopted for the UAP, rather than perimeter block forms;
67. that all representative figures and diagrams are consistent with the provisions of the SEPP, the amendments to Auburn LEP 2010 and the associated DCP;
68. that the height of buildings plan be amended to exclude from the 64m height limit areas designated in the indicative structure plan as roads or parks/square;
69. that midblock setbacks are extended to the corners along the residential zoned streets;
70. that view lines from new pathway along Haslams Creek to the iconic Olympic Park structures be considered in the layout, built form and the DCP requirements;
71. that a requirement be included for the ESD consultant to sign off on DA plans, in the same way as architects do under SEPP 65;
72. that the SEPP include a clause in Auburn LEP 2010 requiring activation of the ground floor in the B2 zone;
73. that non-residential development in the UAP be required to meet GBCA Green Star ratings of 4 stars (and 5 stars for office developments), or a similar rating under the pilot Community Rating Tool;
74. that the staging of the residential areas to the west of Hill Rd be moved to the last phase.

Economic feasibility

75. that the economic assessment of the draft staging plan, including the timing of infrastructure and public transport service improvements, be conducted prior to any rezoning;
76. that the staging plan be amended to move the parts of the B2 strip that do not have access from Uhrig Rd to Phase 2, to ensure the Uhrig Rd centre is not compromised.

Stormwater management

77. that discussions with Council include the contribution towards the maintenance of stormwater quality measures on land to be dedicated to Council;
78. that a full stormwater management study be completed prior to any rezoning of the site;
79. that the stormwater management measures be included within the staging plan and the staging identified in the water management study.

Flood level and finished floor level

80. that the design in relation to flooding recognise the higher flood levels resulting from the pipes through 16-18 and 29-33 Carter St and the topography of the precinct in this vicinity.

Child care centres

81. that the two centres provide for 70 space each, to cater for a proportion of the people working within the precinct;
82. that appropriate planning mechanisms are put in place to enable child care centres within the precinct;
83. that a child care centre be co-located with the community facility near the village centre and dedicated to Council. Council can then run the facility or lease it out to a child care provider;
84. that a potential second location, that can comply with relevant standards and controls, be identified, following the first phase of the development.

Staging plan

85. that a full staging plan for the proposal be submitted as the first DA for the precinct:
 - covering the entire precinct, and beyond as required;
 - showing the location and timing for each phase for the following:
 - Development areas/lots;
 - Road, cycle and pedestrian network;
 - Primary school development;
 - Transport infrastructure and service upgrades (both road and public transport);
 - Community facilities and public open space;
 - Stormwater management measures;
 - Remediation works;
 - Public domain and landscape works;
 - Public art works;
 - consistent with *Auburn LEP 2010*, the DCP, public domain plan, water management plan, landscape master plan and public art strategy;
 - outlining the impacts of the proposed staging and alternatives considered;
 - including evidence of funding or construction commitments, where relevant.
86. that should such a DA not be possible due to patterns of land ownership, an amended staging plan as outlined above be incorporated within the DCP.

LEP maps

87. that the following map tiles be updated for the lands outside the Carter St Urban Activation Precinct with the latest amendment to Auburn LEP 2010, which was notified on 11 March 2014, and any subsequent amendments made prior to the making of the SEPP for the precinct:
 - Height of Building
 - Floor Space Ratio.

Development Control Plan

88. see Section C7 of this submission.

CLOSING REMARKS

Council is looking forward to working with the Department of Planning and Infrastructure to progress this Urban Activation Precinct. Should you have any queries in regard to this submission, please contact Terri Southwell, Senior Strategic Planner on 9735 1309.

Council is also looking forward to the opportunity to discuss ways to progress the infrastructure improvements required, and would be happy to meet with the Department to start the discussions on this matter. As there are a number of areas, where the co-operation of SOPA is required, in order to provide for the future population living next door to the Sydney Olympic Park, it is also requested that SOPA be invited to be part of these discussions.

APPENDIX 1

RECREATION AND SPORT TRENDS

The following is an overview of general trends in recreation participation and some sports-specific participation trends as identified through:

- The annual *Exercise, Recreation and Sport Survey*, commissioned by the Australian Sports Commission.
- *Children's Participation in Cultural and Leisure Activities April 2003*, ABS.

These trends have been summarised in Section 15 of *City of Sydney Open Space Strategy - Volume 2 - Research & Analysis (091006).doc* © Stratcorp Consulting 2006.

Shift to Unstructured Activity

Nationally, there is evidence to show that participation patterns in sport and recreation-based activities are changing in response to a number of factors, including:

- Shifting demographics;
- Technology utilisation;
- Shift away from organised, structured sports.

The shift away from organised and structured sports is a function of the growing perception that people living in high density housing precincts do not have time to commit to organised group activities. This is driving a trend towards more individual pursuits in less structured activities and 'pay and play' activities.

These less structured opportunities will become more important with demographic changes:

- With the ageing population and rising life expectancy, the provision of sport and recreation pursuits suited to aged people will become increasingly important;
- With changes in employment patterns (such as growth in part time work) and working hours (extended trading hours), the timing available for the working population for commitments to organised sport and recreation is changing; and
- With young people becoming more and more part of the workforce, people of these ages will increasingly leave organised activity to take up part time employment.

It is also important to recognise that what can be termed more 'traditional' sport and recreation activities are now competing with activities such as:

- Computer games and the internet;
- Commercial sport and recreation activities such as indoor rock climbing; and
- New cultural activities such as bocce/ petanque.

It is important that recreational planning for the Carter Street and Wentworth Point communities recognises these trends so that a wide range of appropriate facilities will be provided for the long term needs of these communities.

Preferred Activities

The popularity of some indoor sport and recreation activities has also grown substantially. Fitness activities such as aerobics and yoga have almost doubled in popularity over the past 5 years (ABS

survey of recreation participation). Player numbers in basketball are growing and interest in gymnastics and emerging sports, like indoor soccer and hockey, is increasing significantly. A number of factors are contributing to this growth in participation, including:

- A greater number of people wanting to play sport;
- Community concern about obesity and increasing awareness of the health benefits of being involved in physical and mental activities;
- People living longer and staying in better health as they age. Councils and other organisations running active ageing programs which contribute to this outcome;
- Peak sporting groups, associations and clubs better managing their activities and placing greater emphasis on sports development programs;
- Better facilities being provided for recreation activities, including facilities aimed the encouraging more participation by women.

Trails Research

This section is based on the work undertaken by Urban and Regional Planning Solutions on behalf of the South Australian Government's Trails Co-ordinating Committee in the preparation of the *Sustainable Recreational Trails: Guidelines for the Planning, Design, Construction and Maintenance of Recreational Trails in South Australia*.

1. Types of Trail Users

Research suggests that there are three key motivators for adults to be active: health & fitness; enjoyment; and wellbeing. Studies into the uses and users of trails also support this, with the primary reasons given for trail use being to exercise and get fit and for recreation and leisure. Trail users seek the following benefits in using trails: a sense of well-being; opportunities to unwind and relax; closeness to nature; time with family and friends and time by themselves.

In line with these motivators and the trend for unstructured participation, the most significant preferred method of adult participation is walking, with cycling and running also being important activities.

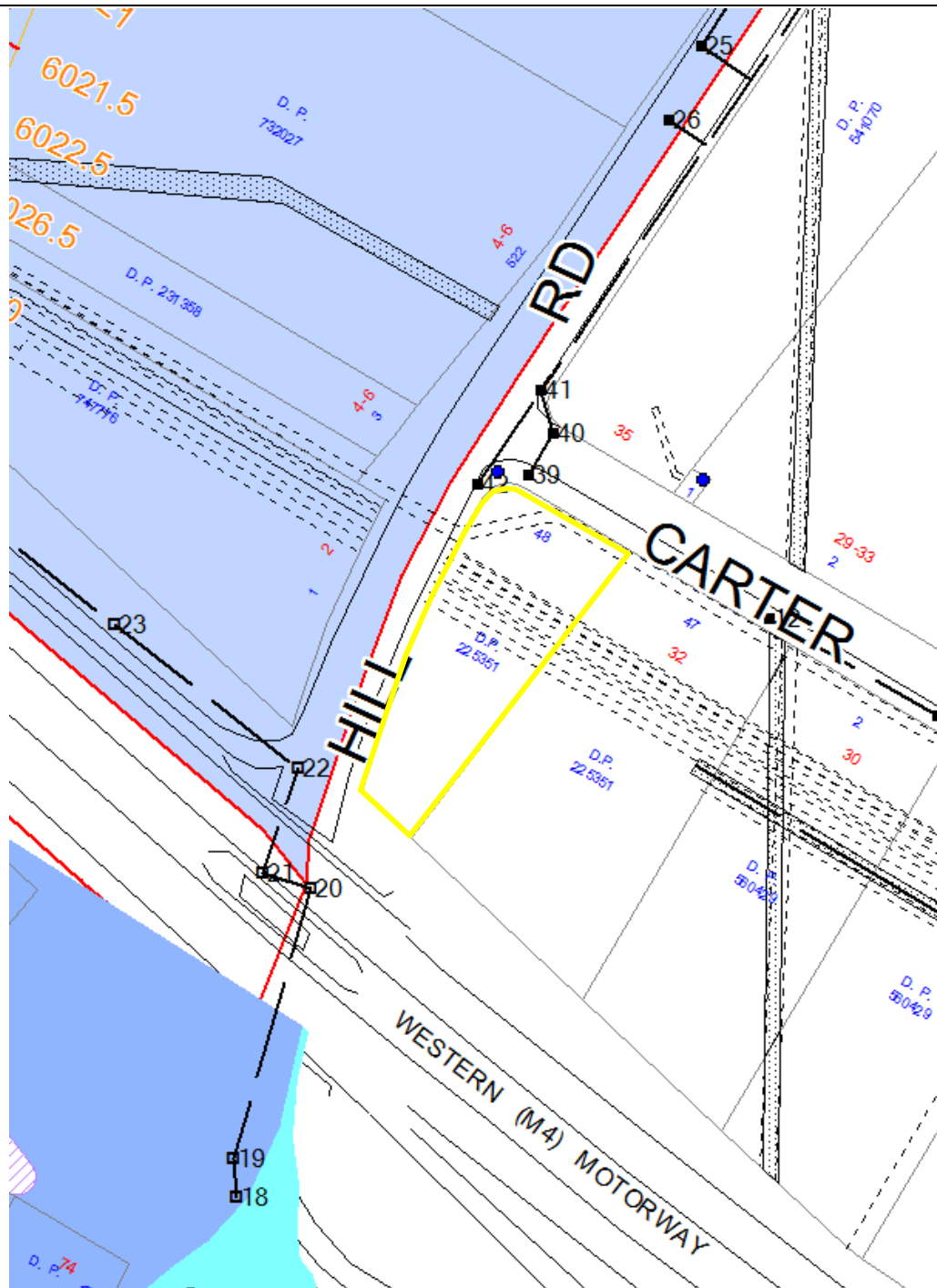
Walkers are typically older females who use the trails for short periods with a focus on the social benefit of trail usage, while people who use the trail for exercise purposes are more likely to use the trail on their own and for shorter periods of time.

2. Benefits of Trails

Significant social and physical health benefits for the future Carter Street community from extended walking trail activities, some of which are summarised below:

- Trail activities facilitate participation and interaction between a diverse range of community members, age groups, individuals and families and facilitate social interaction, e.g. community groups, voluntary trail maintenance and conservation work;
- Trails can offer a wide range of opportunities to a wide range of people. Depending upon design, trails can accommodate the elderly, people with mobility impairments or satisfy those seeking challenging adventures and a sense of achievement;
- Participation in trail activities improves physical and mental health, assists with disease prevention and management, particularly cardiovascular, musculoskeletal, respiratory, nervous and endocrine systems as well as reducing obesity, hypertension, depression and anxiety;
- Participation in trail activities is accessible to low income residents;
- Trails can introduce participants to other recreational and participation offerings in the community;
- Trails help to connect people and places and develop and grow community pride.
















Paths and trails can also bring environmental improvements by including environmental remediation works when constructed. This could include drainage works and tree planting to prevent erosion. The presence of formal paths also reduces the creation of informal paths, reducing erosion. With sensitive design, paths and trails can contribute to an area's sense of place. Paths and trails can become important community meeting places and can provide access to natural and built heritage sites. Information signs can raise community awareness of the natural and built environment. Governments, communities and individuals are increasingly recognising the health and lifestyle benefits of walking and cycling. Developers are also increasingly incorporating and promoting walking and cycling paths in their developments.

APPENDIX 2**HILL ROAD RESERVE - EASEMENTS**

Map Zoom: 0.2659 km

31 March 2014

Legend

	Hill Rd Reserve
	Survey Marks
	Street Names
	Lot and DP Numbers
	House Numbers
	PSD Legend
	DDS Pits
	DDS Pipes
	Creek buffer
	Property Parcels
	Flood Risk Regions (High)
	Flood Risk Regions (Medium)
	Flood Risk Regions (Low)
	EASEMENT
	Overland flow lots
	PSD Zones

APPENDIX 3



Office of the Mayor

The Hon. Duncan Gay, MLC
Minister for Roads
Level 35 Governor Macquarie Tower
1 Farrer Place
Sydney NSW 2000



Mayor
Hicham Zraika

T-14-25

Mark Brisby

TRIM No: T001523/2014

SUBJECT: NEED FOR WESTBOUND OFF-RAMP FROM PROPOSED WESTCONNEX TO HILL ROAD

Dear Minister,

I write to you regarding the need for a westbound off-ramp at Hill Road as part of the proposed WestConnex Motorway.

Stage 1 of the WestConnex proposal includes a new eastbound on-ramp at Hill Road that will allow people to travel from Sydney Olympic Park towards the city (see attached diagram). This is a much needed improvement, particularly in light of the proposed housing and jobs growth being facilitated by the NSW Government on sites along Hill Road. Based on the Department of Planning and Infrastructure's draft plans, Council estimates that over 22,000 dwellings and 37,000 jobs will be provided in this area once the Sydney Olympic Park Masterplan, Carter Street Urban Activation Precinct, Wentworth Point Urban Activation Precinct and Homebush Bay West DCP are fully realised.

In light of this future growth, it is vital that Sydney Olympic Park and Wentworth Point have the best possible transport links. While the proposed eastbound on-ramp at Hill Road is a significant step towards achieving this goal, an equivalent westbound off-ramp would greatly improve the efficiency of vehicle trips to and from the area. The off-ramp would allow cars and buses to avoid up to seven signalised intersections and avoid a convoluted path through Sydney Olympic Park.

In addition to supporting the growing population along Hill Road, the off-ramp would also capitalise on significant government investment at Sydney Olympic Park, and improve access to and from major events.

Your consideration of this proposal would be greatly appreciated. Auburn Council has been actively engaged in the planning phase of the WestConnex, and I look forward to Council's continued involvement with the WestConnex Delivery Authority on this project.

Yours faithfully,



HICHAM ZRAIKA
MAYOR

CC. The Hon. Brad Hazzard, Minister for Planning and Infrastructure

Attachment: Intersection concerned (highlighted in red)

WestConnex – Stage 1: Parramatta to Haberfield

