



**AUBURN CITY COUNCIL**  
MANY CULTURES ONE COMMUNITY

1 Susan Street, P.O. Box 118 Auburn, NSW Australia 1835

Telephone: 9735 1222 Facsimile: 9643 1120  
ABN 63 914 691 587

*In reply quote:*

Director, Urban Renewal, Department of Planning and  
Environment  
GPO Box 39  
SYDNEY NSW 2001

*Contact Name:* S-48-01/02  
T Southwell 97351309

*TRIM No:* T017886/2015

27 February 2015

Dear Sir/Ma'am,

**SUBJECT: PLANS TO OPEN UP SYDNEY OLYMPIC PARK FOR BUSINESS**

Thank you for the opportunity to comment on the draft plan to amend Schedule 3 of SEPP (Major development) 2005 in relation to the public recreation zones in Sydney Olympic Park.

While there is a need to incorporate a range of uses to provide for flexibility within land use zones and to provide for additional uses to permit the adaptive reuse of buildings within the Armory, Council staff have a number of concerns with some of the proposed additional uses, particularly if they are to be applied across the RE1 zones as a whole.

These concerns are outlined in the attached submission. Please note that the submission is from Council staff level, as it has not been considered at a meeting of the Council.

Yours faithfully,



**Monica Cologna**  
**MANAGER STRATEGY**

**Encl. Submission from Auburn City Council staff**

This letter contains important information. If you do not understand it, please come to Council's Administration Building and discuss the letter with Council staff who will arrange Interpreter services, or contact the Telephone Interpreter Service 131 450 and ask them to ring Council on 9735 1222

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Bu mektup önemli bilgileri içermektedir. Mektubu anlayamıyorsanız lütfen Belediye'nin Yönetim Binası'na gelin ve mektubu, tercümanlık hizmetini ayarlayacak olan Belediye görevlileri ile görüşün ya da 131 450 numaralı telefondan Telefonla Tercüme Servisi'ni arayarak 9735 1222'den Belediye'ye telefon etmelerini isteyin.

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Lá thư này có các thông tin quan trọng. Nếu quý vị không hiểu, xin ghé tới Tòa Nhà Hành Chánh (Administration Building) của Hội Đồng để thảo luận với nhân viên của Hội Đồng về lá thư này. Họ sẽ sắp xếp dịch vụ thông ngôn. Hoặc quý vị có thể liên lạc với Dịch Vụ Thông Ngôn Qua Điện Thoại ở số 131 450 và nhờ họ gọi cho Hội Đồng ở số 9735 1222

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這封信包含重要的資料。如果你不明白信的內容，請到市議會的行政大樓詢問市議會職員，他們會安排傳譯服務；你亦可致電 131 450 聯絡電話傳譯服務，要求他們撥電市議會，電話 9735 1222。

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يحتوي هذا الخطاب على معلومات هامة. إذا كنت لا تفهمها، برجاء الحضور إلى مبنى إدارة البلدية لمناقشة الخطاب مع موظفي البلدية وسيقوموا بإعداد خدمات الترجمة الشفهية، أو اتصل بخدمة الترجمة الشفهية على الرقم 131 450 واطلب منهم الاتصال بالبلدية على الرقم 9735 1222.

## Draft Plan to make amendments to SEPP Major Development in relation to RE1 zones at Sydney Olympic Park

### SUBMISSION FROM AUBURN CITY COUNCIL

Thank you for the opportunity to comment on the draft plan to amend Schedule 3 of *SEPP (Major Development) 2005* in relation to the public recreation zones in Sydney Olympic Park (SOP). While there is a need to incorporate a range of uses to provide for flexibility within land use zones, and to provide for additional uses to permit the adaptive reuse of buildings within the Armory, Council staff have a number of concerns with some of the proposed additional uses, particularly if they are to be applied across the RE1 zones as a whole. These are discussed below.

#### 1. OPPORTUNITIES FOR PUBLIC COMMENT

The proposal would result in the potential commercial use of public recreation areas. It is understood that there is no process similar to the reclassification/public hearing process that councils are required to undergo, if public land is to be made available for sale for private uses. It is therefore crucial that this matter be adequately considered at this strategic planning stage.

#### 2. RATIONALE FOR DRAFT PLAN

The Statement of Intended Effect states that the proposed additional uses are mainly permissible with consent within the RE1 Public Recreation zones that apply in the adjoining local government areas of Auburn and Canada Bay. No other rationale for the inclusion of these uses is provided. It is therefore unclear why the change is actually being sought.

The change in land uses (apart from tourist and visitor accommodation) would affect all the RE1 zones on the site. This includes an area of around 120 hectares of recreation lands very close to the population weighted centroid of Sydney Metropolitan Area, including key open space areas such as:

- Bicentennial Park
- Wentworth Common
- Blaxland Riverside Park
- Wilson Park, and
- Newington Armory.

It is therefore critical that the rationale for such a major change is clearly described, so that the impacts can be adequately considered.

A closer examination of the land use tables for RE1 zones in surrounding LGAs, shows that even the minimal rationale provided is misleading. Table 1 shows the permissibility of certain of the additional land uses in the RE1 zone in Auburn and other LGAs in the vicinity of Sydney Olympic Park. The table shows the proposed additional uses that would be most likely to result in the privatisation of areas of RE1 or its exclusion from general public use.

The table shows that the additional land uses proposed in the RE1 zone for SOP are the same as RE1 in Auburn. However, Auburn LEP 2010 was made as a rollover from the previous planning instrument, with historical uses that needed to be incorporated into the zone under the requirements of the State government at that time. Some of these uses may not otherwise have been preferred in the RE1 zone.

Table 1. Permissibility of certain land uses in RE1 Public Recreation zones in surrounding LGAs.

RE1 Zone land uses/ neighbouring LEPs	Child care centres <sup>1</sup>	Markets	Restaurants	Function centres	Places of public worship	Public administration buildings
<b>Auburn (2010)</b>	✓	✓	✓	✓	✓	✓
<b>Canada Bay (2013)</b>	✓	✓	✓	X	X	X
<b>Parramatta (2011)</b>	X	✓	✓	X	X	X
<b>Ryde (2014)</b>	X	X	✓	X	X	X

Permitted ✓

Prohibited X

Accordingly, a more valid comparison can be made with later LEPs made under the standard instrument, in the surrounding LGAs. The table shows that Canada Bay (one of the comparison LGAs used in the Statement of Intended Effects, Parramatta and Ryde prohibit function centres, places of public worship and public administration buildings. Child care centres are prohibited by two of these councils, while markets are prohibited in one.

Function centres, places of public worship, public administration buildings, child care centres and respite day care centres are therefore not uses common to the RE1 zones of surrounding councils. These uses in particular need to be considered more carefully.

### 3. BACKGROUND STUDIES

It is acknowledged that the Heritage Conservation Management Plan for Newington Armory provides a framework for consideration of new uses within that precinct. An assessment is required of whether the proposed uses are consistent with the Management Plan.

In addition, if this were a planning proposal, technical and other studies would be required to support the draft plan. No studies have been exhibited with the draft plan, therefore it is not possible to understand how the draft plan would affect:

- Public recreation
- Traffic and
- Parking

<sup>1</sup> Respite day care centres are required to be permitted under the current LEP instrument, where child care centres are permitted.

#### **a. Public recreation**

The scale of these open space areas, the diversity of facilities, the setting as part of the iconic Sydney Olympic Park and adjoining water, wetlands and bushland, the location close to the population centre of Sydney, as well as specific events, mean that these lands attract large numbers of people from right across the metropolitan region for both passive and active recreation.

Many of the proposed additional uses would conflict with the public recreation functions of the land. This would:

- reduce the capacity of the RE1 zoned lands to cater for the large numbers of people attracted to the outdoor recreational opportunities, and
- be inconsistent with the objectives of the RE1 zone.

As SOP develops there will be a substantial and growing local population requiring access to recreational facilities. This is occurring not only within SOP, but in surrounding areas, such as Wentworth Point and the Carter Street precinct. SOP should consider the need for smaller scale recreation facilities and spaces to cater for the local population as part of the mix. The proposed addition of uses to the RE1 zones in SOP, would reduce opportunities to cater for the needs of the local population and could be more appropriately provided within the B1 and B4 zones.

If SOPA wishes to pursue the permitting of uses such as function centres, public administration buildings, places of public worship, child care centres and respite day care centres across the RE1 zone, it is recommended that a study of the capacity of the RE1 zone to cater to metropolitan, regional and local open space recreational and events needs be carried out.

Alternatively, if there are specific sites where a particular use is sought, the same mechanism proposed for the inclusion of tourist and visitor accommodation in the Armory precinct could be used, presumably a clause permitting the additional use on in that precinct. For instance, some of the additional uses proposed across the RE1 zone may be suitable to enable the adaptive re-use of buildings in the Armory.

#### **b. Traffic and parking**

Some of the proposed additional land uses would also have impacts beyond the site subject to the new use, as they would have the potential to generate a level of traffic that may not be able to be satisfactorily accommodated within the existing SOP road system. This is particularly important for areas that are further from the railway station and have limited existing road access, such as Newington Amory, Wilson Park and Blaxland Riverside Park. This is particularly true for uses such as function centres, public administration buildings and places of public worship.

Parking close to the recreation areas often overflows to the grassed areas, eg in Bicentennial Park. For the heritage listed Newington Armament Depot and Nature Reserve both traffic and parking will be significant issues for any additional uses. The conservation management plan for this precinct includes the following:

- *'Private motor vehicles should only be permitted under very restricted circumstances. These include access for people with disabilities, staff, service contractors; limited buses and coaches associated with approved programs or tours; and temporary parking in designated areas associated with special approved cultural events and*

*activities where parking outside the site is not appropriate. Access and parking is only available provided that the movement or parking of any vehicle or equipment does not occur on areas not designed for that use.*

- *The existing road network will not be extended except as required to serve new buildings in the designated areas (refer to Attachment 2 – Appropriate zones for new development in Section 10). New roads will only be constructed to the minimum necessary extent.'*

While adaptive reuse of buildings in the Armory is supported, uses that have the potential to generate substantial additional traffic and parking would be inconsistent with the conservation management. Again, of key concern are function centres, public administration buildings and places of public worship.

If this draft plan is to be progressed, it is recommended that a study of the heritage, traffic and parking impacts of the additional uses be undertaken.

#### **4. SUMMARY**

Council staff consider that:

- Function centres, public administration buildings, places of public worship, child care centres and respite day care centres should not be permitted uses throughout the RE1 zone for Sydney Olympic Park
- Should these uses still be sought as permitted uses across the RE1 zone, it is recommended that studies be undertaken of the impacts of the proposed uses on the following:
  - Capacity of the RE1 zone to cater to metropolitan, regional and local open space recreational needs including events
  - Heritage
  - Traffic
  - Parking.

Signed



Deputy General Manager



General Manager