



## **City of Parramatta Council Officer Submission**

### **Greater Parramatta Interim Land Use and Infrastructure Implementation Plan**

This is a submission to the Department of Planning and Environment (DPE) in response to the exhibition of the *Greater Parramatta Interim Land Use and Infrastructure Implementation Plan* (referred to herein as the LUIIP). Please note that this submission has been prepared by Council officers, and has not been endorsed by City of Parramatta Council.

#### **Comments on the LUIIP's general approach**

The scale and pace of growth which Greater Parramatta is experiencing - and will continue to experience for the foreseeable future - is unprecedented. There are currently multiple individual precinct and site-specific planning processes occurring within Greater Parramatta, and coordination amongst these processes continues to pose challenges to effective planning and implementation. Council officers welcome the general approach taken by the LUIIP which is to begin the process of stitching together some of these individual processes, and to offer a coordinating framework for land use and infrastructure within Greater Parramatta.

#### **Relationship between LUIIP and other strategic documents**

The overall strategic planning framework in relation to Greater Parramatta is currently a very busy space, including:

- A Plan for Growing Sydney
- Towards our Greater Sydney 2056
- Draft West Central District Plan
- GPOP Vision
- Greater Parramatta Interim LUIIP (via Growth Centres SEPP)
- Special Infrastructure Contribution (SIC) - forthcoming
- Growth Infrastructure Compact (GIC) - forthcoming
- Several individual precinct planning processes - ongoing
- Local Environmental Plan and associated processes (including site-specific Planning Proposals)

While it is appropriate that a great deal of planning activity is focused on Greater Parramatta during this period of intense growth, the unique framework comprising these multiple elements poses challenges to effective communication and coordination. Council officers suggest that clear and consistent guidance which sits alongside each of these elements would be of use in communicating the purpose and role of each part of the strategic planning framework to all stakeholders. Clearer guidance on the roles of DPE and the Greater Sydney Commission and their respective planning activities in this space would also be welcome.

#### **Implications of inclusion in the Growth Centres SEPP**

It is not entirely clear in the LUIIP why the Growth Centres SEPP was selected as the implementation vehicle. The main role of the LUIIP seems to be to draw together several individual precinct planning

processes which are already underway, so it is not entirely clear what is gained by overlaying a SEPP on these processes.

Council officers note that this implementation mechanism opens up the possibility for future rezoning to occur under the Growth Centres SEPP. Council officers express a general preference for planning controls to be kept in Local Environmental Plans, though acknowledge that this functionality of the Growth Centres SEPP may be desirable in some circumstances. For example, new planning controls for the Camellia Precinct might be prepared in this way to help progress the master plan for this precinct.

During exhibition of the LUIIP, DPE staff have advised Council officers that the LUIIP document itself is the “structure plan” for Greater Parramatta to which the Growth Centres SEPP will refer. However, Council officers are concerned that the LUIIP document itself is very high-level and does not offer the level of spatial detail that a “structure plan” should. It is acknowledged that more detailed analysis and mapping for each precinct sits in the LUIIP Background Analysis document; however, this placement means that this analysis/mapping has no formal standing in relation to the Growth Centres SEPP. (Further to this point, please also refer to a comparative discussion with the other “structure plan” currently cited in the SEPP in a subsequent section of this submission.)

#### **Multiplicity of implementation pathways (and bearing on existing and future site-specific PPs)**

Council officers are concerned that the LUIIP cites a variety of implementation mechanisms (“planning pathways”) and requests preferred implementation mechanisms and timeframes are clearly identified on a precinct-by-precinct basis. Council officers are particularly concerned that site-specific Planning Proposals are generally accepted as an implementation mechanism, raising concerns that the LUIIP will have the effect of intensifying site-specific Planning Proposal activity within Greater Parramatta. Please refer to further discussion on site-specific Planning Proposals in the next section of this submission.

As a solution, Council officers suggest that the LUIIP could be strengthened by adding a clear and comprehensive table which notes for each precinct the precinct status, likely timeline for rezoning/final direction, and preferred implementation mechanism. Furthermore, Council officers request that site-specific Planning Proposals are not promoted as a preferred implementation mechanism. Council officers have drafted an example table below, and would be happy to support DPE staff in resolving the details of such a table in the final LUIIP. Please note the following regarding the below table:

- Some precincts have been split based on likely precinct planning processes.
- Some additional “status” types have been added beyond those identified in the LUIIP (particularly to differentiate amongst precincts which the LUIIP identifies as in “Delivery” stage).
- Precincts outside of City of Parramatta LGA should also be included in consultation with the relevant Councils.

Precinct	Status	Timeline for rezoning	Preferred implementation mechanism
Parramatta Road (Granville)	Additional uplift	S117 Direction completed	S117 Direction (complete)
Wentworth Point	Additional uplift	Completed	Rezoning (complete)
Parramatta North	Detailed Planning	Completed	Rezoning (complete)
Carter Street	Detailed planning (and re-planning)	Completed	Rezoning (complete)
Sydney Olympic Park	Current review underway	2017-2018	SOPA Masterplan review
Parramatta CBD	Current review underway	2018	Parramatta CBD Planning Proposal
Westmead	Current review underway	TBD	Priority Precinct process
Telopea	Current review underway	TBD	Priority Precinct process
Wentworthville	Current review underway	TBD	Priority Precinct process
Camellia	Current review underway	TBD	TBD

Carlingford Corridor (excluding Telopea)	Future review	Not yet known	Not yet known
Harris Park/Rosehill	Future review	Not yet known	Not yet known
Rydalmere	Future review	Not yet known	Not yet known
Silverwater	Review not likely in short/medium term	n/a	n/a

### **Precinct planning vs. site- specific Planning Proposals**

As mentioned above, Council officers have particular concern about the potential of the LUIP to intensify site-specific Planning Proposal (PP) activity in Greater Parramatta. Strategic precinct planning is preferable to site-specific PP processes for many reasons, including:

- It is difficult to consider the cumulative impacts of site-specific PPs, particularly when several are lodged in a precinct over a period of time; properly coordinating and considering cumulative impacts in such situations can slow down all aspects of the approvals process. This can be avoided through precinct-based planning/rezoning processes.
- It is more effective to plan for infrastructure on a precinct-wide basis, rather than an ad-hoc, site-by-site basis as is the case with site-specific PPs (please refer to additional discussion regarding infrastructure later in this submission).
- Well-executed strategic planning can help gain community support for growth, because the benefits of that growth can be clearly anticipated and articulated; this is more challenging when managing multiple site-specific PPs.
- Site-specific PPs often propose fewer units than are delivered through broader precinct-based planning/rezoning, and are therefore less effective at timely housing delivery (please see further discussion below).
- Site-specific PPs are much more resource-intensive to manage than precinct-based planning rezoning (please see further discussion below).

In order to demonstrate the intense level resources required to support site-specific PPs and the relative inefficiency of that planning pathway in terms of housing delivery, Council officers have undertaken an analysis of current site-specific PPs and precinct-based processes within City of Parramatta LGA. This may be of assistance to DPE when considering preferred implementation mechanisms for precincts within Greater Parramatta and other areas.

#### *a. Site-specific Planning Proposals*

There are 46 site-specific PPs which propose dwellings currently under active assessment; together these 46 PPs propose about 21,000 dwellings in total. There are an estimated 7.7 FTE planners working to deliver these PPs and associated Development Controls Plans (DCPs) and Voluntary Planning Agreements (VPAs). It should be noted that many of the site-specific PPs also fall within the Parramatta CBD Planning Proposal area (discussed below), essentially meaning that two different resources are working simultaneously to rezone the same land. Please also note that the following types of PPs were excluded from this analysis: Preliminary PPs; PPs which have not been supported; PPs to be withdrawn; PPs which do not deliver any housing (i.e. housekeeping amendments); PPs on hold; and PPs which have been gazetted.

#### *b. Precinct-based process (brownfield)*

An estimated 1 FTE planner is managing a precinct-based process which is currently expected to deliver approximately 7,600 dwellings in a brownfield redevelopment setting. While currently delivered through 5 site-specific PPs, these PPs are closely related and are being undertaken in a coordinated way through structure plans. Please note that these PPs and the relevant 1 FTE planner were excluded from the analysis above.

#### *c. Precinct-based process (urban infill)*

An estimated 4 FTE planners are currently progressing the Parramatta CBD Planning Proposal (and associated DCP and infrastructure funding mechanisms), which is currently expected to yield

approximately 20,300 dwellings in an urban infill setting. Please note that the CBD PP and the relevant 4 FTE planners were excluded from the analysis above.

The results of this analysis are summarised in the following table. These results suggest that precinct-based planning processes can be more than twice as efficient than site-specific PP processes in terms of unlocking housing supply. Council officers offer this case study in support of the request for the LUIIP to steer away from site-specific Planning Proposals as a preferred implementation mechanism.

Process Type	Dwellings	FTE Planners	Dwellings/FTE Planner
Site-specific Planning Proposals	21,000	7.7	2,727
Precinct-based process (brownfield)	7,600	1	7,600
Precinct-based process (urban infill)	20,300	4	5,075

#### **Analysis relating to recent and current growth pipeline**

While it is understood that the preparation of the draft LUIIP largely predated release of 2016 Census estimates, Council officers suggest that establishing a more recent baseline in the final LUIIP is crucial to understanding and accurately describing the scale of recent growth in Greater Parramatta. Using 2011 Census data as a baseline risks missing a massive period of growth that has already occurred between 2011-2016. Using Community.ID data on a suburb basis, Council officers estimate that there were 9,654 additional households occupied in 2016 compared to 2011 in the suburbs intersecting the Greater Parramatta area. This constitutes about 13% of the 72,000 additional dwellings envisioned in the LUIIP (if the 2011 Census data cited in the LUIIP is assumed as the baseline).

Council officers also suggest that the LUIIP must acknowledge the scale of growth currently underway in Greater Parramatta. To illustrate, Council officers undertook an analysis of the site-specific PPs currently sitting within the Greater Parramatta area as proposed in the LUIIP. Key results of this analysis were as follows:

- There are currently 55 site-specific PPs/preliminary PPs within the Greater Parramatta area.
- These PPs contain an estimated 26,500 dwellings, comprising a further 37% of the 72,000 additional dwellings envisioned in the LUIIP.
- These PPs contain only about 4% of the jobs growth envisioned in the LUIIP (estimated from the 311,300sqm of commercial GFA envisioned across the 55 PPs). This highlights the importance of strengthening any possible measures to support jobs delivery in Greater Parramatta.
- These PPs alone contain 24,100 additional car parking spaces, suggesting that proactive traffic and transport modelling for Greater Parramatta (both as precincts and as a whole) is vital.

The two analyses cited above suggest that 50% of the LUIIP's 72,000 envisioned dwellings are already occupied or are in the PP pipeline. There would also be a further proportion of these dwellings in the construction and Development Application pipelines for Greater Parramatta, however, Council officers did not have immediate access to appropriate data to estimate this at the time of writing this submission. Council officers offer this analysis to illustrate the scale and pace of recent and current growth within Greater Parramatta, and to demonstrate the proportion of growth happening through site-specific PPs (which, as discussed above, are not a preferable implementation mechanism).

In response to the above analysis, Council officers suggest that the final LUIIP should more explicitly discuss recent and current development activity, establish a clear baseline using 2016 census estimates, and broaden its suggested monitoring of housing delivery to include analysis of housing delivery by type and housing delivery via different planning pathways. Furthermore, the high proportion of the envisioned growth already "in the pipeline" raises the need for immediate resolution of core infrastructure provision issues (discussed in more detail later in this submission).

Finally, it is also worth noting that the second analysis highlighted above also revealed that there are currently 17 PPs/preliminary PPs in City of Parramatta LGA sitting outside the Greater Parramatta area that together envision about 10,400 dwellings. This demonstrates that growth pressures outside of the Greater Parramatta area are also significant, and highlights that Greater Parramatta will play a regional

role in terms of infrastructure provision for the growing areas just outside of the Greater Parramatta boundary. Any guidance or support which DPE could offer in prioritising delivery within Greater Parramatta, as well as in recognising the wider regional infrastructure role that Greater Parramatta will play, would be welcome.

#### **Some precincts currently excluded from mapping**

Council officers note that Wentworthville, Homebush, Strathfield and Burwood precincts are not included on the statutory boundary map, but are included in the discussion. DPE staff have advised during exhibition that the boundary contained in the Growth Centres SEPP map could be expanded in the future to encompass these precincts, once their extent is known and precinct planning has progressed. Council officers suggest that the LUIIP state this intention clearly.

#### **Council office feedback on Figure 2 – Forecast Growth**

One of the main features of the LUIIP is *Figure 2 – Forecast Growth*. As noted previously in this submission, Council officers support viewing and mapping the Greater Parramatta precincts as a coordinated spatial whole, as this figure does. Council officers have reviewed the dwelling and jobs numbers contained within this figure, and offer the below commentary on a precinct-by-precinct basis. (Please note that precincts outside City of Parramatta have been excluded, as Council officers assume that Cumberland, Strathfield and Burwood Councils are currently being involved in the LUIIP's planning for those precincts.)

Precinct	Comments
Parramatta Road (Granville & Auburn)	<ul style="list-style-type: none"> <li>- Targets should be split between Granville and Auburn to clarify planning responsibilities for each Council.</li> <li>- Timeframe for the rest of the LUIIP is 2036, while these forecast growth numbers are to 2050. These numbers should be scaled to reflect a consistent timeframe.</li> </ul>
Wentworth Point	<ul style="list-style-type: none"> <li>- This dwelling estimate seems low, given the current additional uplift being sought; Council estimates are currently about 9,200 dwellings in total.</li> </ul>
Parramatta North	<ul style="list-style-type: none"> <li>- 2,800 dwellings are slated for lands at Parramatta North Urban Transformation site; however, further additional dwellings from other sites in North Parramatta are expected.</li> </ul>
Carter Street and SOP	<ul style="list-style-type: none"> <li>- This estimate seems low given the 10,700 dwellings envisioned in the SOPA masterplan and 6,000 dwellings at Carter Street (16,700 dwellings total).</li> </ul>
Parramatta CBD	<ul style="list-style-type: none"> <li>- The dwelling and job figures cited relate to a 2056 timeframe; this should be corrected in the final LUIIP.</li> </ul>
Camellia	<ul style="list-style-type: none"> <li>- Council officers concur in principle with the estimate, however, this is subject to adequate provision of infrastructure to support this growth.</li> </ul>
Carlingford Corridor	<ul style="list-style-type: none"> <li>- No dwelling estimates are cited. However, Council staff note that the masterplanning process for Telopea envisions 3,500-4,500 dwellings, and that existing site-specific PPs in Carlingford within the Greater Parramatta boundary envision about 750 dwellings. This current planning activity should be reflected in the final LUIIP.</li> </ul>
Rydalmere	<ul style="list-style-type: none"> <li>- No dwelling estimates are cited. However, Council staff note that existing site-specific PPs in Rydalmere envision about 3,300 dwellings. This current planning activity should be reflected in the final LUIIP.</li> </ul>
Harris Park/Rosehill	<ul style="list-style-type: none"> <li>- No dwelling estimates are cited. However, Council staff note that existing site-specific PPs in Harris Park envision about 800 dwellings. This current planning activity should be reflected in the final LUIIP.</li> </ul>
Silverwater	<ul style="list-style-type: none"> <li>- Background growth should be accounted for.</li> </ul>
Westmead	<ul style="list-style-type: none"> <li>- It is acknowledged that future dwelling figures associated with the Westmead priority precinct process are forthcoming. Background growth should also be accounted for.</li> </ul>

Overall, Council officers also note that the numbers contained in Figure 2 generally seem to correspond to precinct planning processes underway. However, Council officers suggest that there is a level of background dwelling growth which will also occur across Greater Parramatta that should be captured

in the growth forecasts – either overall, or on a precinct-by-precinct basis – in order to more accurately reflect the likely scale of growth, manage expectations, and plan infrastructure accordingly.

Given the above commentary, as well as the previous recommendation that 2016 Census data is used as the LUIIP's baseline, Council officers suggest that updating the overall dwelling forecast for Greater Parramatta is required for the final LUIIP. Council officers are happy to share data with DPE to inform this revision if this is of assistance.

### **Infrastructure planning**

Council officers are concerned that the infrastructure planning in the LUIIP is high-level, indicative and mainly focuses on infrastructure to which a commitment has already been made. Council officers urge DPE that the forthcoming SIC and the final LUIIP must contain more detail and certainty about infrastructure provision to support the nearly 300% residential growth envisioned for Greater Parramatta. This scale of growth raises basic questions about infrastructure provision: will core infrastructure provision (such as transport capacity, hospital beds, schools, etc.) also increase by 300%? Or is there some existing capacity across Greater Parramatta such that some of this growth will be able to be absorbed? A clearer baseline and gap analysis relating to existing infrastructure is required, and the LUIIP must clearly state how the infrastructure planning contained therein appropriately responds to the scale of growth envisioned for Greater Parramatta. Conversely, if further infrastructure needs are anticipated, these should be more clearly stated throughout the LUIIP and associated documents.

Council officers also suggest that Greater Parramatta's broader regional role in infrastructure should be given further attention in the LUIIP. The City of Parramatta is unique amongst most LGAs, in that it includes a CBD which services a regional catchment. Parramatta is envisioned as Sydney's Central City, and, as such, it will play a local, district and regional infrastructure role. This means that the growing communities beyond the LGA boundary will expect and need to use regional infrastructure found in City of Parramatta and expected of a leading city. The growing communities just outside of Greater Parramatta and City of Parramatta must be considered and accounted for in the analysis of regional infrastructure need and requirements in City of Parramatta.

As noted previously in this submission another core challenge with infrastructure planning in Greater Parramatta relates to site-specific PPs – in other words, how should a PP and associated VPA offer be assessed if detailed precinct and infrastructure planning has not yet been completed? It is noted that clause 4.16(1)(f) of the Growth Centres SEPP states that the consent authority must consider "whether the proposed development will hinder the orderly and co-ordinated provision of infrastructure that is planned for the growth centre". Council officers would welcome guidance on a standard for determining this, as it is considered that site-specific PPs may in some circumstances have the effect of hindering orderly and coordinated provision of infrastructure.

The timing of social infrastructure provision is also critical to the wellbeing of new and growing communities. Council officers are concerned that the LUIIP does not clearly specify an approach to staging of infrastructure or acknowledge the need for certain social infrastructure provision (for example, open space) to be provided upfront when the first residents of new communities arrive. Council officers seek acknowledgement in the LUIIP of the need for staging of infrastructure provision, including the need for a process to identify the critical infrastructure to be available for new communities when residents first occupy dwellings in a given precinct.

Regarding the LUIIP's discussion of Social Infrastructure, Council officers are particularly concerned by the following statement in the Background Analysis document (emphasis added):

In October 2016, the Department undertook a high level review of social infrastructure [which found that] ...an assessment of recreation needs and open space for the entire growth area has not been undertaken in sufficient detail...the cumulative impact of this renewal on existing facilities or staging of development of new facilities has not been adequately considered. A more robust assessment, that addresses cumulative impact,

would allow for the more efficient planning and development of social infrastructure within the growth area (pg. 18).

Council officers seek guidance on when the “more robust assessment” mentioned will be completed, and urge DPE to prioritise this assessment. Council has done significant work in this space recently, as evidenced in Council’s draft *Social Infrastructure Strategy*. Part 3 of that *Strategy* is similarly organised on a precinct basis, and Council officers suggest that the analysis contained therein could assist DPE in a more detailed consideration of infrastructure planning for Greater Parramatta. Part 3 of that *Strategy* has been appended to this submission.

Finally, Council officers suggest that the monitoring envisioned in the LUIIP needs to expand to include effective monitoring of infrastructure delivery and traffic/transport impacts.

#### **Council’s future comprehensive LEP Review and development contributions planning**

The relationship between Council’s current and future comprehensive LEP rezoning processes and the LUIIP is not made entirely clear in the document. DPE staff have advised during the exhibition process that a comprehensive LEP review is not explicitly required by the LUIIP/Growth Centres SEPP; rather, a comprehensive LEP review is viewed as one possible mechanism for implementation. It is requested that the LUIIP be updated to contain clearer guidance on this matter.

Addressing the local infrastructure requirements of the growth envisioned in the LUIIP poses a massive challenge to Council, and increased local contributions rates as part of a coordinated funding approach are likely to be required. Support from DPE via any methods possible to assist Council in funding the expanded local infrastructure requirements in Greater Parramatta is requested.

#### **Timeline, resourcing and implementation details**

Council officers suggest that a timeline which clearly stages delivery of the precincts within Greater Parramatta would be of assistance to both DPE and relevant Councils in managing both resources and stakeholder expectations. Relatedly, Council officers suggest that the monitoring aspect of the LUIIP should be more closely tied to an implementation plan which outlines methods, timeframes and responsibilities for monitoring.

#### **Comparison to planning in other priority growth areas**

Council officers note that there are currently three other Priority Growth Areas in the Growth Centres SEPP. The North West and South West Growth Centres are rezoned by the SEPP, so do not represent a comparable process. However, the third area – the Wilton Priority Growth Area – represents a comparable process, in that the Growth Centres SEPP designates this area and refers to an accompanying document (the *Greater Macarthur Land Release Investigation Preliminary Strategy and Action Plan*) as the relevant structure plan. Council officers note that that structure plan contains a level of detail (such as spatial structure plans, detailed dwelling and jobs yield analysis and the like) which is more akin to the Greater Parramatta LUIIP’s Background Analysis document. Clarification is sought as to why the Background Analysis document could not form part of the Greater Parramatta structure plan which is given statutory reference by the Growth Centres SEPP.

Council officers also note the detailed studies that have been undertaken and made public for some other priority areas. For example, the planning process for the St. Leonards and Crow’s Nest Station Precinct has included and made public several detailed studies prior to progressing any LUIIP/SIC<sup>1</sup>. These studies were a Strategic Employment Review, Preliminary Urban Design Analysis, Existing Transport Condition (summary), and Social Infrastructure and Open Space Background Review. The Greater Parramatta LUIIP cites similar detailed studies for Greater Parramatta (utilities and services gap analysis,

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<sup>1</sup> <http://www.planning.nsw.gov.au/Plans-for-your-area/Priority-Growth-Areas-and-Precincts/St-Leonards-and-Crows-Nest>

urban design and land use study, social infrastructure assessment literature review, and Greater Parramatta flooding and draining study). Council officers request that these documents are made public.

### **Precinct-by-precinct commentary**

While this submission has mainly focused on broad strategic planning issues raised by the main LUIIP document, Council officers have also reviewed the LUIIP and accompanying Background Analysis document on a precinct-by-precinct basis. Commentary is offered generally across precincts, as well as on each precinct in the following subsections. Please also refer to the two attached documents which offer additional detailed consideration of infrastructure issues on a precinct-by-precinct basis.

- Part 3 of Council's draft *Social Infrastructure Strategy*
- Graphic comments regarding Parramatta Ways-related infrastructure elements

#### *General comments about precinct analysis*

- Council officers note generally that some information in the Background Analysis document comes from individual precinct planning documents which have been superseded or are otherwise outdated. While Council officers acknowledge the challenges in knitting together these disparate planning processes, and commend the LUIIP's general approach in doing so, it is also generally recommended that the final LUIIP be updated to reflect the latest planning for each precinct. Council officers would be happy to assist in more detail in this regard.
- Council officers suggest that further precinct and master planning in several precincts is needed ahead of any proposed changes to land use. The methodology to test suitability of any uplift or land use change areas must be informed by future desired character, as once land has been up-zoned it becomes very difficult at the local level to achieve outstanding infrastructure, urban design and public domain outcomes.
- The Background Analysis lays out a relatively consistent level of detail in its mapping across precincts. While this move for consistency is acknowledged, Council officers also point out that precinct planning across the precincts is at varied stages, meaning that it may be appropriate for some maps to contain more or less detailed information based on stage of the process.
- Council officers would welcome further opportunities to work with DPE and other stakeholders on a holistic basis and on a precinct-by-precinct basis to ensure that all relevant local infrastructure requirements, policies, strategies and urban design initiatives are adequately acknowledged and overlaid as the LUIIP is progressed and updated.

#### *Urban design comments across precincts*

- Perception of Parramatta as the 'River City' as an extension of the Harbour requires explicit acknowledgement of key landforms, views and view corridors and more detailed plans for contiguous river edge recreation areas (for example, but not limited to: Parramatta Lake to CBD; the CBD foreshore; Parramatta to SOPA; and Wentworth Point to Ermington).
- The greater river foreshore, being a key area of landscape, cultural and heritage significance should be protected for regional open space.
- Planning should include in further detail ferry access with a focus on related tourism benefits in light of cultural and sporting precincts within Greater Parramatta.
- The deficit of crossing points across Parramatta as a river city should be further acknowledged, and future updates of the LUIIP should reflect further work done on this issue.
- Precinct plans and strategies should acknowledge that detailed urban design investigation is required for areas around future metro stops or light rail is required; it is requested that the LUIIP is updated to reflect the latest design consideration regarding Parramatta Light Rail.
- The precinct boundaries map should include 0m–800m isochrones to indicate actual walking distances from transport hubs/ nodes as a key component of precinct plans.
- Undergrounding of high voltage power line and wires should be included in the infrastructure strategy.



- Large areas of Greater Parramatta are within a flood basin. Council officers commend acknowledgement of the need for incorporating local flood policies. However, impact of flood planning on design requires further work. Council has already initiated a design-led approach for development in flood-affected areas, and request that DPE assist with elevating this for the whole corridor.
- The role of some precincts around the CBD (including but not limited to Harris Park/Rosehill) is critical to the growth of the City. Council officers commend the acknowledgement of special heritage precincts and opportunity for heritage sensitive low-rise areas, but note that high-density development of surrounding areas to the CBD will require further master planning.
- The role of urban scars (motorways, RMS land under viaducts, rail corridors, etc.) should be reinvestigated for opportunities to create permeability/ recreation space opportunities, with delivery in the short-term.
- It is critical that the LUIIP is reviewed and updated upon release of metro connections to Parramatta, in tandem with workshops with Council.

#### *Camellia*

- Council officers note that this precinct is identified as “current review underway” which the reflects the extensive master planning process carried out to date by the Department of Planning and Environment in partnership with Council.
- However given that the masterplan has not yet been publicly exhibited the Background Analysis has included a map that is based on the previous Camellia land use and infrastructure strategy released in 2015 so it is out of date and will need to be amended following release of the current masterplan/rezoning proposal.
- The projected growth identified for Camellia by the LUIIP is 10,000 new homes which translates to approximately 23,000 additional people. The ability to achieve these dwellings numbers is largely dependent on State Agency commitment toward the provision of transport infrastructure such as upgrades to James Ruse Drive/ Grand Avenue/and Hassall Street, light rail, additional road access points and new bridges. This will improve both pedestrian and vehicular connectivity to the peninsula and ensure that heavy vehicles associated with the existing employment/heavy industrial area remain viable and have an alternative route to enter or leave the precinct without having to pass through the new Camellia Town Centre.
- Should satisfactory resolution of these traffic and transport issues not be able to be resolved for the precinct, a staged release of the precinct should be considered or alternatively dwelling numbers revised.

#### *Carlingford Corridor*

- Council officers note that this precinct is identified in Figure 4 of the LUIIP as “future review” (except for Telopea priority precinct). Further guidance on this matter is requested – what is the potential timeframe for this review? What provision is made for preliminary infrastructure planning in order to deal with any additional site-specific PPs that may emerge in the meantime? It should be noted that Council is conducting an urban design analysis of the Carlingford corridor to inform the Parramatta Light Rail project which could assist the Department’s review.
- Outside of progressing the Telopea Priority precinct process, there are no identified actions for Carlingford in the next 12 months identified in the LUIIP. There is also no infrastructure identified in the Telopea/Carlingford corridor, despite the detailed infrastructure planning that has already underpinned the masterplanning process at Telopea. The LUIIP should be updated to reflect the Telopea masterplanning process, including infrastructure provision.
- Council is currently progressing the Carlingford Block Study Area and associated site-specific PPs (containing up to 770 new dwellings), however this area is not shown on the map as an area for intensification.

- The ‘potential intersection upgrade’ shown page 45 of the Background Analysis document (Baker St / Pennant Hills Rd / New Access Rd) is still preliminary. Is the expectation that developers in the local area contribute to this intersection upgrade/signalisation through the proposed SIC or that the developers for Carlingford Block Study pay for the entire intersection? Will the RMS contribute anything towards these works? Will SIC funds from developments across the wider area help fund this upgrade / signalisation?

#### *Harris Park/Rosehill*

- Council officers note that this precinct is identified in Figure 4 of the LUIP as “future review”. Further guidance on this matter is requested – what is the potential timeframe for this review? What provision is made for preliminary infrastructure planning in order to deal with any additional site-specific PPs that may emerge in the meantime?
- Council officers are supportive of the green link shown under the M4 viaduct. However, this requires landowner commitment from RMS and Sydney Water commitment, which has not yet been confirmed.

#### *Parramatta CBD*

- As noted previously in this submission, the dwellings/jobs numbers cited for the CBD are the Council-adopted targets for 2056 (not 2036).
- It is unclear what is meant by the statement “*Further analysis on the quantum of additional jobs and homes to be provided within the CBD need to be undertaken*”. (Background Analysis, page 36, first bullet point) Given that the PP has been submitted to DPE for Gateway, it is not clear what or at what stage additional analysis will be required?
- In the bullet point relating to “expansion of commercial capacity” (page 36 of the Background Analysis), there is some language in relation to Council’s previous Economic Development Strategy 2011-2016. Council has recently endorsed an updated policy – the Economic Development Plan 2017-2021 - and Council officers suggest this document could aid in updating this discussion.
- Council officers welcome the comments that flooding constraints in the CBD require a system which is “flexible” and “merit based”, as well as the acknowledgment that “sheltering within an appropriate building may be a safer option”. Further detail and guidance from DPE is requested regarding flood policy issues across the Greater Parramatta area, as Council continues to progress flood planning in the CBD and other precincts.
- Council officers question why there is not a stronger consideration of hierarchy between the precincts of Greater Parramatta – particularly in relation to the Parramatta CBD, which sits at the heart of Greater Parramatta as Sydney’s Central City. This should be more explicitly discussed in the LUIP, particularly in terms of transport connections and promoting employment growth.
- Council officers identify a need for a more in-depth constraints analysis around transport as part of the LUIP. While capacity is broadly identified as an issue, this would be strengthened by a more detailed discussion of capacity shortfalls and delineation of the constraints in spatial terms – for example, is it North/South capacity that is poor? The document should also address when will those different capacity pressures start to be problematic and stage solutions accordingly.
- Council officers request that the language around solving CBD transport issues is strengthened, as driving growth and change in the Parramatta CBD requires proactive planning and implementation of transport solutions.

#### *Parramatta North*

- Council officers seek clarification as to why Parramatta Park is included as part of the Parramatta North precinct. The Park is regional-level open space which services the entire catchment and beyond, and borders several Greater Parramatta precincts.

- Mapping Corrections for Parramatta North: The green area in PNUT should be updated to reflect at least the RE1 zoning (refer PLEP 2011). However, please refer to Section 4.3.6 of the PDCP 2011 which shows that more parkland will be delivered than the RE1 zoning (noting that of the total PNUT area of approximately 26 hectares, approximately 7 hectares will be provided as public open space). In addition, the green area and boundary of Western Sydney Stadium should be updated; please refer approval of Stage 1 concept approval (DPE Major Projects website). Also reference should be 'former Parramatta Gaol'.
- Council officers suggest that the text relating to this precinct to describe a more comprehensive picture of Parramatta North (refer text 30-32). The text of the Background Analysis is written in relation to the PNUT precinct only (approximately 26 hectares), with Parramatta North being a far larger area (150 hectares). The text should demonstrate a clearer understanding of the lands within the map boundary, current planning status and future planning opportunities in relation to future housing and employment. For example:
  - Future housing and employment opportunities including lands west of the former Parramatta Gaol and Linen Service (refer DPE Assessment Report for PNUT, July 2015).
  - The importance of the New Western Sydney Stadium (critical piece of sporting infrastructure for the city, design excellence, activate uses around the Stadium for the community, regional pedestrian/cycleway connections, and connections with light rail). In addition, the Stadium has concept approval (Stage 1) with Stage 2 approval forthcoming. As part of the Stage 1 approval, a maximum of 20,000sqm GFA is allowable for a mixed use development in the northeast corner (text states 34,000sqm).
  - The transformative impact of Parramatta Light Rail, including its transformative impact and the latest planning status.
- Recommendations in relation to Short Term Actions:
  - Add "Delivery of new open space, including new river foreshore park and regional pedestrian and cycle links (subject of current DA/1124/2016 lodged by UGNSW with Council)"
  - Add "Lodgement of DAs for development on PNUT"; it should be acknowledged that, following rezoning, Council is now the relevant planning authority and subsequent DAs over 7 -10 years will deliver housing and employment in the precinct.
  - Add "Facilitate conservation and adaptive reuse for Kamballa/Norma Parker Centre/former Female Factory sites." UGNSW responsibility within 2 years (refer to commitment in SPROUT report).
  - Add "Adaptive reuse of buildings on PNUT for community uses." Council is currently working with UGNSW to negotiate dedication of a number of buildings in the precinct for potential community uses to support future and existing populations.
- Missing road infrastructure item: Intersection of Cumberland Highway, Windsor Road and Church Street

#### *Parramatta Road (Granville)*

- The text/figure relating to Granville in the Background Analysis should reflect the key aspects related to the Parramatta Road Strategy which are discussed in more detail below.
- Reflect Strategy's correct name "Parramatta Road Corridor Urban Transformation Strategy" (not 'New Parramatta Road').
- Clearly reference the current status of this precinct, e.g. "the Strategy aims to provide an integrated land use planning and transport framework to guide future land use change in a staged manner that will be co-ordinated with infrastructure delivery and funding. The Strategy and Implementation Tool Kit are given statutory weight through a section 117 Ministerial Direction and the Draft Central West District Plan under the EP&A Act 1979, which applies when a relevant planning authority prepares a planning proposal for land within the Corridor."

- Distinguish both in the text and figure between ‘Precincts’ and ‘Frame Areas’ (refer pages 13-15 of the Strategy). While the Precincts (including Granville and Auburn) are earmarked for renewal, the Frame Areas (stretches of land between each precinct) will be transformed to a lesser extent. This is particularly relevant for Granville, as Clyde (which is part of the Frame Area) contains strategically-important employment lands which are not subject to rezoning.
- Reflect in the Plan that the Implementation Plan of the Strategy (enacted via s117 Direction) has identified parts of the Precincts that would be able to see renewal in the short term (2016-2023). This staged approach is important as it is linked to delivery of housing and jobs and delivery of supporting infrastructure.
- The Strategy and Implementation Plan stipulate that any rezoning for Granville is reliant on the undertaking of a precinct-wide traffic study. Future traffic increase represents a significant constraint for the Granville Precinct, and not undertaking a detailed traffic study for the Precinct is a barrier to rezoning for additional homes and jobs (Council can provide examples of this impact). In addition, RMS has indicated via an individual planning proposal that they would not support rezoning in the absence of a study being undertaken. Therefore, the LUIIP should articulate that a precinct-wide traffic study and supporting modelling is required to be completed, and should consider the recommended land uses/densities and future WestConnex conditions, and identify the necessary road improvements and upgrades required to be delivered as part of any proposed renewal in Granville.
- Recommended action for next 12 months: Council officers request addition of an action to “Undertake a precinct-wide traffic study (RMS and Council)” As outlined above, this is the first step in progressing any rezoning for Stage 1 of the Granville Precinct.
- Missing road infrastructure item: Intersection of Parramatta Road, Church Street and Woodville Road.

#### *Rydalmere*

- Council officers note that this precinct is identified in Figure 4 of the LUIIP as “future review”. Further guidance on this matter is requested – what is the potential timeframe for this review? What provision is made for preliminary infrastructure planning in order to deal with any additional site-specific PPs that may emerge in the meantime?
- The Rydalmere ADHC site is identified as a longer term priority (“Explore the future use and redevelopment potential of the Government Property site” Background Analysis, p. 52). However, Council has already considered a PP for this site (detailing a mixed-use precinct with about 2,500 dwellings and 20,000sqm of retail/commercial floorspace) and public exhibition is likely in coming months. The LUIIP should accurately reflect the current status of this site.
- The document mentions that the ADHC site should provide for “complimentary uses to the university” but does not indicate what these are, how they should be achieved, or if there are any incentives for the University or developer to provide them. Council officers have tried to include conditions and additional local provisions in the PP for this reason, and request stronger guidance from the State Government on this issue through the LUIIP and other channels.
- The area to the east of the ADHC site and Vineyard Creek (Rippon Ave and Anderson Ave) is an appropriate location for the future investigation of intensification given the areas proximity to the future Parramatta Light Rail and Western Sydney University. A pedestrian/cycle link across Vineyard Creek connecting the ADHC/Property NSW site to this area is important as both areas are currently isolated from the rest of the Rydalmere area.

#### *Silverwater*

- Council officers note that while this precinct is not currently identified for review in the short to medium term, there is background growth and change – particularly in relation to neighbouring precincts – which will need to be effectively planned for and managed.

#### *Sydney Olympic Park/Carter Street*

- As noted previously in this submission, Council officer suggest that the overall dwelling estimate for SOP/Carter Street reflected in the LUIIP do not reflect the likely scale of growth.
- The Background Analysis cites “possibilities for a new school”, however, Council officers note that this has already been announced.
- A traffic study and transport modelling for the Olympic Peninsula are urgently needed.
- Council officers consider that Council is currently functioning as a facilitator between Light Rail and developers/SOPA, and request assistance from DPE in this regard.
- Council officers question why the LUIIP does not include an analysis of constraints, challenges and opportunities for SOP/Carter Street (as with other precincts).

#### *Wentworth Point*

- Council officers suggest that dwellings cited in the Background Analysis for Wentworth Point do not reflect the likely scale of growth, given the resulting development and additional uplift currently being sought in Wentworth Point. This also has implications for infrastructure planning, as the growth at Wentworth Point is likely to be beyond that envisioned under the previous rezoning process.
- Additional local intersection works will be required above current Section 94 contributions.
- It is vital that opportunities to provide effective local open space within remaining development areas are identified and progressed.
- Council officers question why the LUIIP does not include an analysis of constraints, challenges and opportunities for Wentworth Point (as with other precincts).

#### *Wentworthville*

- Council officers understand that the area of Wentworthville to be subject to the priority precinct planning process has not yet been defined. However, Wentworthville includes a train station and Council officers expect that much of the investigation will focus on the area surrounding the town centre and train station.
- Wentworthville is a community with a mixed demographic profile. There are many residents who are socio-economically disadvantaged, including a large number of residents who reside on the Wentworthville Social Housing Estate. The estate is approximately 1.4 km by road from the train station. The social housing is poorly-designed, old and poorly-maintained, which impacts on the overall amenity and safety of the site, as well as the wellbeing of residents in and around the estate.
- The priority precinct process will focus significant resources from many Government agencies on Wentworthville, making this is a once-in-a-generation opportunity to benefit the existing and future community, and especially those who are most vulnerable. The Wentworthville community stands to gain significant positive social impact through this process if the planning methodology is sound and includes areas of Wentworthville where housing renewal and placemaking could make a significant impact on wellbeing. Council officers suggest that the priority precinct planning for Wentworthville will be most successful if it includes the Wentworthville social housing estate. If it does not, the process will fail to meet the most pressing issues within this community, and will not be able to effectively stimulate the housing market to deliver housing targets.

#### *Westmead*

- The LUIIP identifies Westmead as a Health and Education Precinct identifying that 30,000 jobs could be provided in Westmead by 2036. However, in addition to the provision of employment, the LUIIP also identifies the potential for the master-planning process to investigate opportunities for increased residential development. While it is acknowledged that the land on the eastern side of Hawkesbury Road (along the future light rail route) has the potential to

accommodate higher density residential development (as part of a mixed use development) this residential land is currently already fully developed with 3-4 storey residential flat buildings. As part of the current master-planning process underway for Westmead, detailed analysis will be carried out to determine the feasibility of overcoming the existing strata title issues within this area as part of considering any increased residential density within this area.

- Located within the Study Area boundary is the Northmead (Briens Road) Industrial Precinct. This precinct is located directly north of the Westmead Health Precinct and is currently zoned for General Industrial purposes. The *Parramatta Employment Lands Strategy 2016* recognises that this industrial precinct forms part of the larger Westmead Health Precinct and has the potential to play an important role in the ongoing growth of the precinct. The Strategy recommends that the precinct be retained for industrial purposes and has the potential to provide capacity for spill-over from the Westmead Health Precinct for biomedical and health related industries. The importance of this precinct in supporting the success of the medical precinct is critical and will be considered as part of the Westmead master-planning process.
- Although Westmead has strong public transport links (existing heavy rail station and future light rail), the precinct's road network experiences significant congestion during AM and PM peaks. A transport and traffic study is required to support the Westmead master-planning process in order to identify road improvements or upgrades (both local and classified roads) required to facilitate increased employment and residential capacity within the precinct.
- A master-planning project for Westmead is currently underway. The project is being driven by key partners in the precinct that include the Western Sydney Local Health District (WSLHD), City of Parramatta Council, Cumberland Council and the Department of Planning and Environment (DPE). Separate work is being undertaken to develop masterplans for the northern part of Westmead that comprises the Westmead Innovation District, hospitals, university campuses, rail link, town centre and residential areas, and the southern part of Westmead which is primarily residential. An overarching PCG will oversee both the northern and southern master-planning projects and ensure that they complement each other. This master-planning work will inform the development of Westmead as a 'Priority Precinct' in collaboration with DPE.
- Missing road infrastructure item: Widening of the Bridge Road, Westmead bridge over the railway line.