

7 September 2017

Land Release/Greater Parramatta Growth Area
Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

Dear Sir/Madam,

Re: Strathfield Council Submission – Greater Parramatta Interim Land Use and Infrastructure Implementation Plan

Thank you for the opportunity to comment on the Land Use and Infrastructure Implementation Plan (the interim Plan) for the Greater Parramatta Priority Growth Area (growth area).

The growth area covers 12 existing, proposed and potential future precincts from Westmead to Strathfield earmarked for urban renewal. In the Strathfield local government area (LGA), Homebush has been identified in the growth area (the Precinct is also partly within the Canada Bay LGA). Homebush is projected to provide an additional 9,450 new homes and 12,853 new jobs by 2050 through the implementation of the Parramatta Road Urban Transformation Strategy (PRUTS). Population growth must be supported with adequate services and infrastructure to deliver positive planning outcomes. Accordingly, Strathfield Council commends the NSW Government's preparation of the interim Plan to guide the future redevelopment and delivery of infrastructure within the growth area.

However, Homebush and Strathfield are expected to experience more growth with the announcement of the Priority Precincts, finalisation of the *Draft Central District Plan* and planned transport infrastructure, including the Parramatta Light Rail and Sydney Metro West. Therefore, the interim Plan should be updated as the growth area expands and development is projected.

Council officers have reviewed the Interim Plan and provide the following comments.

Homebush Precinct

Council note the constraints and opportunities identified in Homebush in Section 3.5.3 of the interim Plan, including the key opportunity of *“reduced car dependency by lowering parking rates in areas with good access to public transport”*. Although Council supports the notion of reduced car dependency to alleviate traffic congestion, Council, at this point in time cannot commit to reducing car parking rates in the Homebush Precinct until adequate transport infrastructure is provided.

Draft Infrastructure Schedule

The interim Plan contains a draft Infrastructure Schedule which identifies infrastructure required in the growth area. In the Homebush Precinct within the Strathfield LGA, the following works are identified:

- Underwood Road/Pomeroy Street (intersection upgrade);
- Derowie Avenue/Parramatta Road (intersection upgrade);
- Regional cycleway; and
- Upgrade to existing schools.

The interim Plan does not provide any details of the proposed infrastructure or justify their inclusion in the Plan. The Department needs to provide more details on the proposed infrastructure, including the exact locations, the required works, and the assessment criteria used to justify their inclusion in the Plan. For example, Derowie Avenue is partially closed with no through vehicular access permitted to Derowie Avenue from Parramatta Road. Accordingly, the need for an intersection upgrade at Derowie Avenue/Parramatta Road may not be warranted.

State Government Strategies and Infrastructure

The State Government has proposed a number of rezoning strategies and transport infrastructure projects in the Strathfield LGA, including the PRUTS, Homebush and Strathfield Priority Precincts, Parramatta Light Rail and Sydney Metro West. Since there is limited detail on many of these projects, including their location and the resulting population growth, Council is unable to specify the required infrastructure for the Homebush Precinct.

Through Council's involvement with State Government agencies to progress these rezoning strategies and transport infrastructure projects, it appears that there is a lack of coordination between agencies as they progress their own projects. To ensure infrastructure is identified appropriately and delivered in a timely and coordinated manner, it is recommended that State Government agencies collaborate with each other and with councils on rezoning strategies and transport infrastructure projects.

Council Nominated Infrastructure

Despite the uncertainty of rezoning strategies and transport infrastructure projects, there is an existing shortfall in infrastructure provision within the Homebush Precinct which should be rectified prior to the delivery of additional housing and jobs. Council nominate the following infrastructure projects:

- Australia Avenue/Underwood Road roundabout – The roundabout provides a link to the M4 Motorway and Homebush Bay Drive. It also provides access to major sites such as DFO Homebush, Sydney Olympic Park and Sydney Markets which are expected to experience significant growth. Despite numerous State Government plans to alleviate queuing at the roundabout, the existing roundabout continues to suffer ongoing delays and congestion.
- Pedestrian access to Marlborough Road – Pedestrian access is limited between Sydney Markets and Marlborough Road. Upgrading existing infrastructure and improving linkages will assist in enhancing connectivity and safety within the Homebush area that is bisected by Centenary Drive.

Infrastructure Funding Mechanisms

The interim Plan identifies a number of infrastructure funding mechanisms to finance the required infrastructure in the growth area. Some of these mechanisms are discussed below.

Special Infrastructure Contribution (SIC)

Council supports the implementation of a State Infrastructure Contribution (SIC) within the growth area to fund infrastructure beyond the ability of Council to finance. However, Council wish to emphasise the need to finalise the infrastructure list and SIC contribution prior to any development occurring to ensure growth can adequately be accommodated by infrastructure.

Section 94 Contributions and Planning Agreements

The mechanisms available to local government to fund infrastructure is limited. The main source of funding is Section 94 contributions, which for most areas is capped at \$20,000. The recent changes to the thresholds for contribution rates in the Local Infrastructure Growth Scheme transition areas are noted. However, Strathfield Council does not benefit from the amendments. Council should be afforded a lift in caps where significant growth is planned, particularly under the PRUTS and Priority Precincts. The resulting population growth will create a greater demand for infrastructure and services in excess of what can be funded by a \$20,000 cap contributions plan. Furthermore, the process for councils to have their contributions plans reviewed by the Independent Pricing and Regulatory Tribunal (IPART) when they wish to exceed the cap or seek a funding gap requires significant resources and time that most councils do not have.

Council's ability to provide public benefits through voluntary planning agreements and value capture policies is also limited when they are not mandatory and the negotiation power of councils is restrained when planning proposals refused by council are recommended to proceed to Gateway by planning panels.

Given the restraints on councils to fund infrastructure, the Department of Planning and Environment should direct resources and support to councils to fund and deliver infrastructure at the local level. This may involve reviewing caps on Section 94 contributions, reviewing the IPART process to modify the cap, and mandating planning agreements and value capture policies.

Precinct Support Scheme

Council support the proposed Precinct Support Scheme to complement Section 94 contributions to fund local infrastructure projects. It is noted that the precinct planning process and community consultation will identify projects to be funded through this scheme. Council requests to be consulted at the earliest opportunity to ensure funding is provided for priority projects.

Thank you for your consideration of Council's submission and we look forward to working with the Department of Planning and Environment to ensure adequate infrastructure is provided in existing and future growth areas.

Should you have any queries, please do not hesitate to contact Joanne Chan, Council's Strategic Planning Officer, on 9748 9615.

Yours faithfully,

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

Silvio Falato
Manager Planning & Development