7 September 2017

NSW Department of Planning and Environment
Greater Parramatta Growth Area
10 Valentine Avenue
Parramatta NSW 2150

By online submission
CC. community@planning.nsw.gov.au

To whom it may concern,

Re: Greater Parramatta Interim Land Use and Infrastructure Implementation Plan

The City of Canada Bay (CCBC) commends the NSW Government for working collaboratively with the City of Parramatta and the Greater Sydney Commission to develop the Land Use and Infrastructure Implementation Plan (the Interim Plan) for the Greater Parramatta Priority Growth Area.

The Interim Plan provides the base upon which detailed work can be leveraged in identifying and documenting essential and critical infrastructure. It also enables the development of the State Infrastructure Levy Contribution (SIC) for state infrastructure, the identification of amounts required to adequately fund local infrastructure through the Section 94 contributions and formalises other financing mechanisms.

CCBC provides the following submission in response to the interim plan, acknowledging the document is evolving and will be updated as infrastructure items and funding mechanisms are identified and completed. The issues raised are identified to facilitate and support new development and communities.

1. Flooding in the Concord West Precinct (area to the west of the Northern Railway Line)

In 2015, CCBC undertook a flooding study in the Concord West area west of the Northern Railway Line, which falls within the Greater Parramatta Priority Growth Area.

The results of the report identified significant 1 in 100 year flooding in the precinct that will require a planning and infrastructure response to facilitate redevelopment.

The flooding occurs in large areas adjacent to Powells Creek, with flooding triggered by a number of sources, including overland flow, tidal events affecting water in the creek and rainfall levels. A copy of this study can be provided to the Greater Parramatta team.

**Action**

Update the Hydrology Map within the Interim Land Use and Infrastructure Implementation Plan Background Analysis Report to include 1:100 year flooding occurrence in the Concord West precinct, west of the Northern Railway Line. Refer to the following map.
2. Infrastructure constraints limiting the connection between Greater Parramatta and the Central District

The Concord West precinct has limited vehicular entry and exit routes into and out of the area. Studies of the precinct have identified that the intersection on the corner of George and Pomeroy Streets is required to be upgraded to release capacity for new housing. Intersection upgrades come at a financial burden to local government due to the cost associated with the relocation of services and pipelines. For this reason, CCBC has not been successful in acquiring the funds required to release development potential for the area.

**Action**

*The identified critical intersection upgrade at George / Pomeroy Streets be included in the Infrastructure Schedule within the Interim Plan Background Analysis Report, as an item under the ‘Homebush’ section.*

3. Connecting active transport links from Greater Parramatta to Sydney CBD through the City of Canada Bay local government area

The Concord West precinct to the west of the Northern Railway Line provides key active transport links for cyclist commuters journeying from the Greater Parramatta areas into Sydney CBD. Cycling through Concord West enables cyclists to avoid Parramatta Road and its adjoining streets that are subject to heavy traffic and high speed vehicular movements.

The NSW Roads and Maritime Services (RMS) provides an interactive cycleway finder online, which identifies routes that are appropriate for cycling. Where no shared path, cycle ways or separated cycle paths exist, the interactive maps identifies appropriate on-road environments for cycling by defining their on-road environment as either ‘low’, ‘moderate’ or ‘high’ difficulty.

As cyclists exit Sydney Olympic Park and head towards North Strathfield (via Pomeroy Street Bridge to cross Powells Creek), they utilise on-road environments that are identified as ‘moderate’ in difficulty. However, from Pomeroy Street Bridge eastwards, the interactive map does not identify any appropriate on-road environments nor cycle paths.

Studies in the area have found large numbers of commuting cyclists through the precinct and along Gipps Street. For this reason, a separated cycleway has been funded by RMS along the entire lengths of Gipps Street (Concord) and Queens Road (Five Dock).

**Action**

*Infrastructure item for a dedicated cycleway be included in the Infrastructure Schedule within the Interim Plan Background Analysis Report to provide appropriate off-road cycle paths linking Pomeroy bridge and the planned Gipps Street separated cycleway.*

4. State Infrastructure Levy to not disadvantage Local Section 94 Contribution and Affordable Housing Contribution

It is understood that the intent of the Interim Plan is to provide the basis for levying a State Infrastructure Contribution. Development feasibility needs to consider the ability for land to be developed whilst accommodating levies and contributions that are proposed to fund public
infrastructure, provision and maintenance of streets, public open space, affordable housing and the like.

Development feasibility calculations recently undertaken by CCBC with consultants specialising in development economics, have identified that development feasibility is capped, unless the government is prepared to forgo appropriate development density that achieves quality urban design and public domain outcomes, which directly affect the lives of the communities that live in these developments.

In addition, the recent IPART review and lift of Section 94 Contributions caps, means that Councils have the ability to prove the case for S94 contribution amounts higher than the former $20,000 cap in metro areas. With this in mind, it is critical that the proposed State Infrastructure Levy allows S94 contributions to be lifted by retaining feasibility within the calculations for increased S94 amounts.

Action
That the Department of Planning and Environment ensure the State Infrastructure Levy amount takes into consideration the amounts needed to appropriately fund local infrastructure under Section 94 Contribution (inclusive of likely upcoming increases to S94), and mandatory Affordable Housing Contribution (5%-10%) required by the Planning Minister in recent announcements and in the District/Regional Plans.

5. Development Feasibility in areas with no direct benefit from State Infrastructure

Whilst the Interim Plan is in draft form and contains high level infrastructure information, it can be seen that some of the major infrastructure items proposed will not necessarily ‘directly’ benefit certain areas within the Greater Parramatta growth area. For example, a light rail line may run through a certain area, but not provide a light rail stop to enable the residents to embark or alight. For areas that do not benefit from a direct nexus from proposed infrastructure, the Department of Planning may consider a separate contribution or levy amount to areas with direct positive impact from proposed infrastructure.

Action
That the Department of Planning and Environment test various levy mechanisms that enable infrastructure as they come to fruition, to levy appropriately areas that benefit directly versus areas with no direct benefit. This will require consideration to be given to the methodology used to calculate the levy and enable the delivery of Affordable Housing and other local infrastructure that are essential to the successful renewal of these areas.

Yours sincerely,

Tony McNamara
Director, Planning and Environment