This submission has been prepared by Strathfield Council in response to the invitation for comment from UrbanGrowth NSW on the New Parramatta Rd – Draft Parramatta Road Urban Renewal Strategy.

Council has raised its concerns with UrbanGrowth NSW through various briefings and correspondence to date relating to the significant increase in densities proposed in the Draft Strategy for the Homebush Precinct.

Council would like to reiterate that the State Government should address transport infrastructure and amenity issues before proposing any significant proposed increases in dwelling targets. Council’s concerns particularly relate to the specific traffic and amenity impacts of the proposed density increases and the lack of detail in regards to how the required additional infrastructure and services to support the targeted population growth along the Parramatta Road corridor will be provided.

Additional Dwelling Targets for Homebush Precinct

The Draft Parramatta Road Urban Renewal Strategy identifies the Homebush Precinct proportion of high density residential development in the Parramatta Road corridor, with targets of 10,350 to 16,200 new dwellings. Council is concerned that 33 percent of overall population growth in the corridor is targeted in Homebush Precinct despite it being less than 10 percent of the length of Parramatta Road.

Council would also like to clarify whether the figures indicated in the Draft Strategy include the increased densities proposed in the Strathfield Local Environmental Plan (SLEP) 2012 for the Parramatta Road Corridor area. It should be noted that Council has already allocated significant increased densities in the Parramatta Road and Homebush North area, consistent with the recommendations in the Strathfield Residential Land Use Study and the State Government’s population projections. The increased densities planned for the Parramatta Road Corridor and Homebush North area in the SLEP 2012 include up to 4,000 additional dwellings (not including significant additional dwellings in other sections of the LGA) as part of Council’s response to the 20-year dwelling targets for the Strathfield LGA, as stipulated in the Draft Inner West Subregional Strategy 2010. The Draft Parramatta Road Urban Renewal Strategy proposes an additional 300-400 percent increase in residential yields within the precinct, which needs to be supported by further comprehensive background studies and capacity modelling.
Infrastructure and Services

One of Council’s main concerns relates to the lack of information regarding the provision of additional transport and social infrastructure and services to support the proposed increase in densities. The Draft Strategy proposes an additional 35,640 people (2.2 persons per dwelling) in the Homebush precinct, but does not include any plans for the provision of infrastructure such as new roads, public transport, education, hospital and medical services, community facilities and open space.

Transport Infrastructure

There are severe existing traffic congestion and car parking issues affecting the Parramatta Road corridor area, which would be greatly intensified by the increased population targets set out in the Draft Strategy.

According to the Parramatta Road Traffic Mobility Study (Bitzios, 2014) initiated by Council, the key issues affecting the Parramatta Road corridor area include:

- Heavy congestion at Parramatta Rd, Bridge Rd, Knight St, Loftus Crescent, Centenary Drive, Arthur Street, Underwood Road, and Homebush Bay Drive;
- Reduced parking supply along Parramatta Road due to clearways during peak periods and other parking issues in areas surrounding Underwood Road, Bridge Road, Crane Street, Courallie Avenue;
- Public Transport issues such as low frequency of service at Flemington and Homebush stations; and
- Active Transport issues relating to cycling barriers and limited crossings along Parramatta Road, M4 Motorway, and Homebush Bay Drive.

Council would also like to highlight that the Draft Strategy have attempted to justify the proposed increased densities under the premise that the WestConnex Motorway serving as the higher order traffic carrying route, would allow for the localisation of Parramatta Road and improve local movement and ease through traffic congestion. However, according to the Environmental Impact Statement for the WestConnex Project released in August 2014, the traffic modelling generally shows minimal to no improvement on the Parramatta Road traffic volumes in the Homebush/Strathfield precinct, particularly in the Parramatta Road/Concord Road/Leicester Avenue and Parramatta Road/Wentworth Road intersections even after the full WestConnex project is completed.

The WestConnex M4 Widening project also includes a new “G-loop” intersection at the junction of Homebush Bay Drive and the M4. WestConnex representatives have indicated that this will improve the general North/South traffic flow in the precinct. However, there has been no modelling released to indicate that this would be the case.

Council therefore emphasises the importance of addressing the existing North/South traffic congestion within Homebush Precinct and undertaking traffic and public transport modelling in order to provide adequate traffic and road infrastructure to support any additional densities being proposed.

Council also suggests further investigation on the possibility of having a light rail system along Parramatta Road connecting Parramatta to Sydney via Homebush, in accordance with the Strategy’s aim to reshape transport into an integrated system. This is also consistent with the priorities set in the Metropolitan Plan (2014) to investigate a potential light rail corridor from Parramatta to Strathfield/Burwood via Sydney Olympic Park.
In addition, Council is also concerned with the potential increased maintenance costs relating to the increase in usage of local roads due to the significant proposed increase in population within the Parramatta Road corridor area.

Open Space

According to the Recreation and Open Space Planning Guidelines for Local Government (Department of Planning, 2010), the locally appropriate provision standard for recreational open space in Inner Urban areas within Metropolitan Sydney should be around 15 percent of an LGA’s share of non-industrial land (9% for Local/District Open Space and 6% for Regional Open Space) to ensure that there is a 1.5-hectare park within 1 kilometre of most dwellings and a 1000-square metre ‘pocket park’ within 400 metres of most dwellings to provide for neighbourhood needs.

The above provision standard, the capacity of existing open space, and additional demand per person as densities increase should be the primary considerations in determining the location and rates of provision of open space. The Draft Strategy should incorporate these considerations and undertake background studies and capacity modelling for any additional recreational open space requirements along the corridor before proposing significant increases in dwelling targets. This is a critical concern for Council as the Draft Strategy could potentially bring up to 35,640 new residents living in the Homebush Precinct. Additionally, Council would like to raise its concern on the potential impact of the Draft Strategy and the WestConnex Project on the progress of the future open space planned located at the old Arnott’s site.

Education

The Draft Strategy indicates that the Homebush Precinct could have similar development intensity to Meadowbank and St. Leonards/Crows Nest. According to the Australian Bureau of Statistics (2011), 12.7 percent of St. Leonards/Crows Nest’s population is between the ages of 0 to 17. If the Homebush Precinct will have a similar age demographic and development intensity, it would mean that there will be around 4,526 children and young adults living in the area at capacity (2.2 persons per dwelling).

Council would therefore like to emphasise the importance of having a delivery plan in place to increase the capacity of educational infrastructure to cater for the potential demand for additional pre-schools, primary, and secondary schools.

Hospitals and Medical Services

According to the Australian Institute of Health and Welfare (2012), the average number of hospital beds per 1,000 population is 2.6 for public hospitals and 3.9 for private hospitals. This means that the additional 35,640 people targeted to live in the Homebush Precinct would potentially require an additional 93 public hospital beds or 139 additional private hospital beds.

Whilst it is recognised that the Homebush Precinct has access to a number of private and public hospitals (i.e. Concord Hospital, Strathfield Private Hospital, Alwyn Rehabilitation Hospital, St. John of God Burwood Hospital, etc.), the additional demand for medical
services relating to the increase in the overall population within the precinct still needs to be taken into consideration.

**Affordable Housing**

The long term trend for property prices in Strathfield show that housing prices will continue to increase by 4.4 percent annually (Australian Property Monitors – Home Price Guide, 2014). In addition, the Strathfield Residential Land Use Study (JBA, 2012) found that a high proportion of low to moderate income households in Strathfield is in housing stress (74% in 2006) as compared to Sydney (61% in 2006). Council recognises the need ensure that any significant increases in residential targets within the LGA, such as what is proposed in the Draft Strategy, will contribute to alleviating this issue. Council therefore highlights the need for clarification on the approach of the Strategy relating to Affordable Housing.

**Impact on Adjacent Areas**

Council is concerned about the relationship between Homebush Precinct and the adjacent residential and employment areas and the potential land use conflicts resulting from the increased densities proposed in the Draft Strategy.

Council is particularly concerned about the potential impact of the proposal on the amenity of the low density residential area to the south of the rail line. Council would like to ensure that adequate measures are undertaken to minimise any potential adverse impacts (i.e. traffic congestion, parking issues, amenity issues, negative impact on property values, etc.) from the increased densities within the Parramatta Road corridor to adjacent low density residential areas.

Council also objects to any proposed residential development in the B6 Enterprise Zone (eastern portion of the corridor, opposite the Sydney Markets), as this precinct is aimed to provide employment land to support the economic development and employment particularly relating to the Sydney Markets. In addition, this precinct is a highly inappropriate area and hostile environment to be considered for increased housing development as it is bordered by the M4 Motorway, Homebush Bay Drive, Parramatta Road, the location of the “G-loop” intersection proposed with the WestConnex M4 Widening project, and the Sydney Markets to the south.

The impact of the potential growth in the Sydney Olympic Park Authority area should also be taken into consideration in modelling and reviewing the Draft Strategy. This applies to both the existing and planned residential development at Sydney Olympic Park and how this will impact the demand road and public transport capacity and other infrastructure and services.

**Community Involvement**

On 16 November 2014, Council was informed in writing that the release of the Draft Parramatta Road Urban Renewal Strategy will be delayed until 2015 to the enable the integration of further background studies (i.e. Transport, Urban Amenity Improvement Plan, Reconfiguration Proposal for Parramatta Road, etc.) and the release of other plans, projects and strategies such as the WestConnex and M4 East Environmental Impact Statement and Metropolitan Strategy.
However, contrary to the above advice, it was announced on 24 November 2014 that the Draft Parramatta Road Urban Renewal Strategy will be on public exhibition until 12 February 2015. This exhibition period is effectively quite limited given the Christmas, New Year, and January holiday period.

The New Parramatta Road Display Office then opened on 7 January 2015, almost three weeks after the Draft Strategy’s release. On 13 January 2015, it was also announced that UrbanGrowth NSW will conduct two public information sessions at Ashfield (31 January 2015) and Granville (7 February 2015).

In addition, the online survey provided by UrbanGrowth NSW provides limited feedback and no opportunity for any specific comments relating to the amount of dwellings proposed, the suitability of the specific locations targeted, and the infrastructure and amenity issues that would need to be addressed. The online survey therefore does not have the capability of gathering any meaningful public feedback on the Draft Strategy.

Council is concerned that the public consultation undertaken does not provide the community adequate opportunity to provide substantial feedback relating to such significant increases in residential densities due to the limited scope of the online survey, the short effective exhibition period, late commencement of the display office, and provision of only two community information sessions.

**Council Involvement**

The Draft Strategy (page 6) outlines that the development of the strategy has included various activities, workshops, and studies and briefings with councils and stakeholders.

The document indicates that “an outcome of these activities is the Draft Integrated Land Use and Transport Concept which is a component of the draft Parramatta Road Urban Renewal Strategy”.

Recent verbal presentations from the UrbanGrowth project team to Council’s officers and Councillors have implied that the contents of the Draft Strategy is based on the input from the workshops including those of the Officers from the various Councils. Whilst the workshop input would have guided elements of the Draft Strategy, the proposed densities, specific locations, and the lack of infrastructure provision and modelling to support the proposed increase in densities has clearly not reflected the input of Strathfield Council Officers.

Council Officers from various Councils contributed important input at the two interactive workshops including advice on strategic planning principles for the corridor and general principles relating to residential land use planning and provision of transport and social infrastructure. However, Council would like to emphasise that the Council Officers also provided important feedback relating to existing constraints and limitations such as traffic, public transport and infrastructure issues.

In particular, Strathfield Council Officers provided specific comments relating to:

- The existing traffic congestion issues particular to the North/South routes in Strathfield and Homebush precinct;
• The need to preserve the employments precinct (e.g. northern side of Parramatta Road opposite Sydney Markets) and further west along Parramatta Road;
• Information on areas impacted by 1:100 flood extent;
• Concerns about increasing densities in the Homebush Precinct including the Underwood Road area without modelling the provision of significant road and public transport infrastructure improvements.

It should also be noted that it is understood that 'Community Panel' included only one person from each of the eight local government area across the corridor. It is questionable whether this small level of representation of the community and provides value or input from a representation perspective into the development of the Draft Strategy.

Documentation Photos

Council raises its concern on how the Homebush Precinct has been represented in the documentation released by UrbanGrowth NSW. The Draft Strategy document and associated fact sheets included a photo (photo of graffiti on an old building) that does not appropriately represent the general current condition within the Homebush Precinct. Council would like to highlight that there has been substantial ongoing redevelopment within the Strathfield LGA portion of the Parramatta Road Corridor with over 15 significant mixed use and residential developments approved and a number being constructed since the gazettal of the Strathfield Local Environmental Plan in 2013.

It should also be noted that the photo used in the Draft Strategy document for the Auburn Area precinct (page 24) is within the Strathfield LGA. This contradicts the description for the Auburn Area Precinct indicating that it is located wholly within the Auburn LGA.

Statutory Framework

Although it is indicated that the Statutory Planning stage for the Draft Strategy is not set to start until late 2015, Council would like to get clarification in relation to the Statutory Framework for the implementation of the Strategy (upon finalisation). Council is also seeking some clarification on how the Final Strategy will affect its existing local planning controls and policies.