



12 February 2015

info@newparramattard.com.au

Dear Sir/Madam

Re: Draft Parramatta Road Urban Renewal Strategy

The Southern Sydney Regional Organisation of Councils (SSROC) is an association of sixteen municipal and city councils. SSROC provides a forum for the exchange of ideas between our member councils, and an interface between governments, other councils and key bodies on issues of common interest. Together, our member Councils cover a population of over 1.6 million, or one third of the population of Sydney.

Conceptually, urban renewal and improving the Parramatta Road corridor are welcome initiatives and have great potential to enhance the amenity of the area for its local communities. We therefore support the overall objectives of the strategy and would like to work with you to achieve it.

However, views on the draft strategy differ between southern Sydney Councils. Unfortunately the deadline for comments on the draft means that this submission is made before it has been considered and reviewed by SSROC's Delegates or its advisory Committees. It has been written by SSROC's secretariat, after limited consultation with council officers. My primary concern in relation to the draft is therefore that extensive, two-way communication between all stakeholders should be undertaken continuously as the strategy evolves and the program of change and development is developed.

In particular please note that this submission in no way reflects the position of Leichhart Council.

The comments above notwithstanding, thank you for the opportunity to provide feedback on the draft strategy. We offer the following observations as a positive contribution to the future strategic planning process, and look forward to continuing to contribute to this important initiative.

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The need for continuing dialogue.

Parramatta Road is a critical thoroughfare within the southern Sydney region, and the implementation of the strategy will have serious and lasting direct effects on several of our member Councils. Indirectly, it will affect the whole of our region. Dialogue and active involvement in decision-making by councils and communities is therefore essential throughout the region, in most especially with those councils directly affected.

Integration with planning processes

The government has released its new metropolitan strategy, *A Plan for Growing Sydney*, and is about to embark on a subregional planning process in which SSROC and councils anticipate being involved. It is very important that plans for finalising and delivering the *New Parramatta Rd* should be aligned with subregional plans and the process conducted in parallel.

There is also a need for integration with other relevant plans, such as the Long Term Transport Master Plan, Sydney's Rail, Bus, Cycling (etc.) Future, and the NSW Freight and Ports Strategy. Much of the freight that moves through the southern Sydney is actually destined for Sydney itself, so analysis of freight movements is a prerequisite to understanding how much is really likely to move off Parramatta Road on to WestConnex.

Communicate the vision

As a high level observation, SSROC would suggest that the draft strategy needs to be revised to describe a vision of a renewed and revitalised locality, maximising the benefits of new and upgraded infrastructure. It should present a vision that is engaging for the community, and likely inspire the willingness necessary for participation in the planning process. It should reflect a genuine desire to renew and revitalise the corridor for the benefit of the communities that are already there and will be there in the future.

Currently it conveys primary objectives as uninspiring increases in housing density adjacent to potential business locations: these features should be the building blocks that will help to deliver the vision of renewed places for communities. The opportunity for enduring urban revitalisation may be missed if the vision for the future of the corridor is so narrow.

Make the most of the opportunities

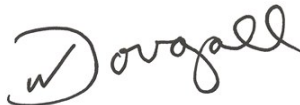
If this is a real opportunity to achieve genuine urban renewal, there could be tremendous benefits to the community, the economy and the environment of the Parramatta Road corridor. The concept of urban amenity improvement should be innovative and adopt some new technologies and approaches, not just opportunities for, for example, "consistent street furniture". Initiatives such as renewable energy precincts, energy from waste and automated waste collection systems could all be features, and today can be cost-effective developments.

Conclusion

The New Parramatta Rd project could offer real opportunities for world-class 21st century urban renewal, and rejuvenation of a key Sydney thoroughfare. SSROC urges the government to adjust its approach from a narrow (re-)development and expansion focus to a sustainability focus: bring out the best of Parramatta Road for the community, economy and environment, and maximise the benefits of the project and WestConnex for the local area, Sydney and NSW.

I also attach a list of comments, issues and questions on specific elements of the draft document. Should you wish to discuss any aspect of this submission or the planning process, please do not hesitate to contact me or SSROC Program Manager, Helen Sloan, on 9330 6455 or ssroc@ssroc.nsw.gov.au. I will send an amended submission after this letter has been reviewed by SSROC Delegates and their feedback collated, should that be appropriate. I look forward to contributing to the future planning process.

Yours faithfully,

A handwritten signature in black ink that reads 'Namoi Dougall'. The signature is written in a cursive style with a large, looped 'D' at the beginning.

Namoi Dougall
General Manager
Southern Sydney Regional Organisation of Councils

Attachment: Draft Parramatta Road Urban Renewal Strategy – Key Issues

1. Glossary (page i, ii)

Explanation of “Governance” is inadequate: something more like “the process and structures for decision-making and control”.

“Parramatta Road Reconfiguration Program”: it would be helpful to have further reference for this as there would seem to be an integral connection between it and the Urban Renewal Strategy.

“Sustainability” restricts the economic to just business – they are not identical, and the broader aspects are important to the local community.

2. *Urban renewal is about transforming under-used and dilapidated areas, boosting local economies, and providing a mix of uses to meet the needs of the community. Parramatta Road is the spine connecting the City to Parramatta and the west (p2).*

The strategy is lacking in quite how this renewal will be achieved: while a strategy should not cover delivery in full, it should articulate the steps that will be taken next to develop the implementation plan.

3. *Renewal is driven by population growth, demand for new housing and jobs close to public transport and city infrastructure. Population growth is expected to be 51,600 by 2031 to a total of 69,700. Increase is 3.2% of Sydney’s overall expected growth of 1.6 million (p2).*

If this plan is intended to inform the development of the sub-regional plans, then it would help to know that, and to understand the process for their development. It would be preferable for the two processes to occur in parallel, and for a revised draft to be released for consultation, incorporating the relevant aspects of the subregional plan.

In addition to population growth, other drivers include:

- needs of the people who already live in the area;
- needs of the businesses that already operate there;
- reversing the causes of deterioration identified in the box on p3.

4. *“Community involvement is essential because places, local character and amenity are precious, and best understood at a local level” (p2).*

In the draft strategy, communities will “be informed, have opportunities to comment, and be encouraged to participate in the planning process” – they will not have decision-making role, but are passive participants. If any urban renewal process is to be successful, it is essential that it actively involves the communities affected by it in the development of solutions.

There is concern across the regional as to the provision of open space and recreation space (particularly how this will be delivered and funded, and how the space may be provided). The strategy needs to recognise that a funding mechanism will be needed for the delivery of such spaces, and that a coordinated and cohesive strategy will need to be initiated to ensure that these facilities do not come at a cost to environmental quality (or at a loss to

existing environmental areas that must be retained and protected). Sydney Olympic Park may be close to capacity as a regional recreation resource, and has little capacity to absorb the high level of demand that may come from the realisation of development within the Parramatta Road Corridor.

5. The NSW Government is aiming for 50,000 new dwellings and 50,000 jobs in the Parramatta Road corridor (p3).

The targets for new dwellings and jobs are require some explanation. There is currently no justification for, derivation of or context for these figures or their allocation to specific localities, which would greatly help councils to understand them and to explain them to their own communities.

The document refers to housing “choice” and “diversity”, but makes no mention of affordable housing. Affordability is a major issue for the inner-Sydney areas, with many key workers being forced out to suburbs on the fringes of Sydney where they have higher travel costs and will naturally choose to work if the opportunity arises locally. Housing choice and diversity would be welcome, but there is a concern that affordability needs to be considered as a discrete issue and separately addressed. Specific affordable housing targets, and mechanisms for delivering affordable housing, would be a useful contribution to the strategy.

6. Eight urban renewal precincts – Granville, Auburn, Homebush, Burwood, Kings Bay, Taverners Hill, Leichhardt and Camperdown – as a start. They are special areas identified for growth and change ... (p4)

The language here is not conducive to winning the interest and support of the local communities. There is an opportunity within this project for real, meaningful urban renewal. The more engaging language of renewal, reinvigoration, making them better places, becoming Sydney “villages” would be more appropriate for community and broader stakeholder participation. (The language used in the box on p4 “*The revitalisation path*”, is closer to what is needed.)

7. Reference to changing traffic volumes (p4).

The analysis of traffic volumes is a significant influencing factor for the development of the area, as it could be another key driver of the renewal strategy. Councils comment that it is imperative that future alternative traffic routes (WestConnex), are supported by measures to actually reduce traffic flow and impact on Parramatta Road.

8. Key actions and opportunities e.g. street beautification (p4)

These are all good actions and opportunities: we should also make the best of this chance to incorporate for more innovative improvements for the localities. For example

- street and building design to allow for garbage truck accessibility without reversing;
- new waste technology such as neighbourhood underground garbage bins in high density areas, and local waste disposal facilities e.g. small scale anaerobic digesters;

- neighbourhood renewable energy generation;
- burying all cabling instead of having it overhead;
- access to green spaces and recreational facilities.

The strategy seems to focus on the provision of a high quality public realm, and while this is strongly supported, little detail is provided in the document. There is some concern that it may mean simply streetscape and civic design, and may not adequately address the needs of the proposed level of population (and employment) increase. Some further expansion of what strategic direction is actually implied for the public realm would be helpful, particularly when promoting the strategy to the communities directly affected.

9. Aims and objectives ... to increase quantity and diversity of housing, expand transport choices, grow the number of job opportunities in Western Sydney and improve liveability (p5).

The concept of urban renewal is presented in a way that is unlikely to be inspiring to a person who is not involved in planning or development. The focus on provision of housing, transport and jobs – all of which is essential – could be better conveyed to non-industry stakeholders in terms of the characteristics of a revitalised community. To be engaging, the strategy aims and objectives should be about creating the environment within which a community can be established or reinvigorated and sustainably thrive.

The section on “About Urban Renewal” p17 on, could usefully set out Guiding Principles, like the transport ones on p15.

10. Urban amenity improvement (p19)

Urban amenity improvement conceptually is strongly supported. However, there are other opportunities, which are not suggested in the strategy (see comment at point 8 above). Those listed here would be very positive improvements, and the list should be subject to thorough review and input from the community and other stakeholders, including new innovations.

13. The Precincts (p25 to 36)

At this stage it is difficult to offer any specific feedback on the precinct proposals. The strategy appears to be at a very early stage of development, and lacks sufficient detail for meaningful comment at this level.

The strategy currently raises questions. For example, Burwood could evolve to support the existing town centre with business uses fronting Burwood Road to Parramatta Road, surrounded by mixed use/residential development, with a 10% population increase in Parramatta Road corridor, and perhaps 5,000 new dwellings by 2050. Further information on how these figures were derived, particularly within the context of the subregional plan, would be very helpful. The narrow strip of proposed business frontage on Parramatta Road “surrounded by mixed use/residential development” is difficult to reconcile with neighbouring streets that contain much heritage listed property. Much more information

and consultation is required for any meaningful dialogue on the individual precincts proposed.

15. *Government Decision Making (p38)*

More detail is required as to the decision-making process. The section does not actually explain how decisions will be made, and does not cover critical issues such as:

- How will communities be engaged and involved in decision-making?
- Who will be in the Integrated Project Team, and how will work? Assuming that it includes representatives from the Councils, then how will they liaise and accommodate issues and objections from their own Councils?
- How will the process fit with subregional planning under *A Plan for Growing Sydney*?
- Councils have invested significant resources in community consultation process and developing community strategic plans. How will these be reflected in the corridor strategy and related delivery projects?
- How do Local Environmental Plans influence the strategy?
- What is the timeframe for plans and decision-making?