



28 January 2016

The Director, Urban Renewal
Department of Planning & Environment
GPO Box 39
Sydney NSW 2001

Dear Director

Re: Sydenham to Bankstown Urban Renewal Corridor 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.

In order to make this submission within the timeframe of the review, it has not been possible for it to be reviewed by councils or to be endorsed by the SSROC, therefore, consider this submission a draft, and we will contact you further if any issues arise as it is reviewed.

The details of SSROC comments are as below.

General Comments

The *Sydenham to Bankstown Urban Renewal Strategy* is a strategy for a very important urban renewal project that will affect the lives of tens of thousands of people and households. The SSROC Secretariat appreciates that the Department of Planning and Environment allowed more time for feed back on the draft strategy. Further work needs to be done to make the strategy more collaborative and responsive to the needs of the community. Key comments, suggestions and recommendations are highlighted below.

Specific Comments

Collaborative corridor futures

The draft strategy indicated that it was developed in “consultation” with the Marrickville Council, the City of Canterbury and the Bankstown City Council. The level of engagement is not sufficient for effective collaboration.

SSROC supports a collaborative partnership arrangement and agreement between the NSW Government agencies such as the Department of Planning and Environment and councils on urban intensification projects such as the Sydenham to Bankstown urban renewal. SSROC member councils prefer a governance model that involves allocation of leadership and coordination roles for delivery of key precincts among councils and state planning and infrastructure agencies.

The preferred model would involve: joint State /Local Government staffed project management office, secondments of council officers to the project team and joint workshop opportunities at key stages. We would urge the NSW Government agencies, including the Department of Planning and UrbanGrowth NSW to enter into a Memorandum of Understanding with the three councils directly affected. SSROC member councils adopted MOU guides for projects such as the *Sydenham to Bankstown Urban Renewal Corridor Strategy* and is attached for your consideration

(Attachment A). The Department of Planning and Environment should reach collaborative MOU with the three councils that sets out mutually agreed objectives, community engagement approach, working arrangements, liveability benchmarks, housing, transport, employment and education outcomes and recreation and environmental sustainability priorities.

Best practice guides for urban renewal

SSROC would like to see state-council collaboration on the development and application of best practice guidelines for urban renewal projects on the Sydenham-Bankstown corridor. The collaboration should cover housing and employment demand supply assessments, analysis of urban capacity for intensification, including housing and employment uses. It should also include determination of benchmark metrics for liveability and sustainability and ensuring timely and coordinated community infrastructure such as open space, childcare, primary and high school education and affordable housing.

Liveability

The term “liveability” here means all the characteristics such as amenity, accessibility, quality of life, environmental sustainability that are necessary for the wellbeing of a community. SSROC member councils have adopted a report and position on liveability. A copy of the report is attached for your consideration (*Liveability Benchmarks for Central and Southern Sydney*).

The draft strategy seemed to have been developed without an articulated concept of liveability for the 11 urban centres on the Sydenham to Bankstown corridor. For example, precinct sustainability, provision of schools and educational facilities, and housing affordability were largely left out. Faced with intensified urban development, including 36,000 additional dwellings by 2036, there is need for integrated and embedded concept of liveability in the *Sydenham to Bankstown Urban Renewal Corridor Strategy*.

It needs to be recognised that the expected thousands of new dwellings and new homes will have implications for social infrastructure such as childcare, primary and secondary schools and health services. These need to be identified as essential components of the strategy. Integrated approach to planning and recognition of liveability principles and benchmarks are important. Existing infrastructure capacity and future demands need to be identified, types, locations and costs of provision of facilities quantified and sources of funds and implementation and governance arrangement for delivery of infrastructure and facilities collaboratively agreed.

For example, many schools in the City of Canterbury have already attained 100% demand rates. The expected 24,500 new dwellings in the City of Canterbury area and up to 68,000 persons by 2036 entail 5,900 additional primary students and about 4,800 high school students. Provision needs to be made for more primary and secondary schools. Campsie urban centre could require up to two additional primary schools.

The other implication is that suggestions for use of school playing fields for additional playing fields may not be realistic in the Sydenham to Bankstown corridor if additional lands are required in existing schools to build additional classrooms and related learning facilities.

Affordable housing

The strategy made no reference to affordable housing and set no targets for same throughout the corridor. The City of Canterbury has lower median household income of \$1,209 compared to \$1,447 for Greater Sydney and higher proportion of households in housing rental stress of 38.4% compared to 25.1% for Greater Sydney. Affordable housing is therefore an important issue on the Sydenham to Bankstown corridor.

It is envisaged that lots of relatively affordable housing stock will be lost as part of the corridor redevelopment. Active intervention is required to ensure that affordable housing stocks that are inevitably lost are replaced and also to address affordable housing needs of key workers.

The 16 SSROC member councils in the report *Liveability Benchmarks for Central and Southern Sydney* endorsed 30 per cent of residential developments in urban renewal precincts and corridors to be devoted to affordable rental housing. While the target is a guide, the zero target for affordable housing in the draft strategy is unacceptable.

The co-location of affordable housing and social housing with the housing for the wider market is suggested and supported. Further, inclusionary zoning should be considered as a strategy for generating a considerable number of affordable homes.

Transport infrastructure

SSROC welcomes that the draft *strategy* included key improvements to public transport services such as:

- Parramatta to Bankstown bus corridor
- Bus service from Liverpool to Burwood via Bankstown
- Rapid bus connecting Bankstown
- Upgrade of transport interchanges at Campsie, Canterbury, Marrickville and Bankstown
- Potential light rail between Bankstown and Parramatta
- Rapid bus connecting Bankstown and Sydney Olympic Park via Punchbowl.

However, SSROC emphasises that there is also a need for improved transport links to the south-east. SSROC member councils in the South District have highlighted the need for their residents to be able to get directly from the district, including centres such as Hurstville to Bankstown and Parramatta in order to access employment opportunities in these areas. We strongly urge the NSW Government to consider, when developing strategic plans for an area, the needs of neighbouring areas too.

High rise and mixed use development

It should be expected that there could be varying expectations among affected councils and communities on the issue of specific building height limits to guide planning proposals in the High-rise and Mixed Use Developments areas. For example, the City of Canterbury and Marrickville Councils could tend to be at odds with a change from low-rise to high-rise and higher density urban dwellings and the impact on established character of the urban landscape. On the other hand, Bankstown City Council may be more favourable to such a change. It is therefore important that a comprehensive urban design study that incorporated community and council input is undertaken for each urban renewal precinct to collaboratively clarify the desired heights and character. There is need for such collaborative steps to strike a balance that seeks to retain as much as possible identity and urban centre character and high-rise multi apartment buildings.

High-rise apartments tend to increase the density and sometimes without corresponding amenities and services. It is essential that, if high-rise development is permitted, then provision of commensurate amenities and social infrastructure also be required.

Environmental sustainability

An increase of 36,000 in the number of dwellings across Marrickville, City of Canterbury and Bankstown councils would likely result in a 26% increase in waste generation. At a rate of 11kg per household for general putrescible waste (GPW) alone, that would mean increase of almost 400 tonnes in GPW every week or over 20,000 tonnes each year. As fundamentally a public health issue, the removal of waste is an essential service delivered by, and at cost to, councils and their residents.

Additional waste management infrastructure will be inevitably required to meet the challenge of additional tens of thousands increase in the number of dwellings and people in the Sydenham to Bankstown corridor. The expected 26% increase in waste generated will mean additional costs

for waste management. There will be additional transport and collection costs, as well as additional truck movements with the associated environmental and social impacts.

It is therefore critical that ideas and proven models for waste minimisation, renewable energy and waste recycling options should be considered. Possibilities for consideration include precinct-level renewable energy infrastructure such as neighbourhood waste-to-energy facilities and public-space solar power generation. Significant developments will generate major increases in waste generation, but also create opportunities for new technologies to be deployed, such as automated vacuum waste collection systems. With landfilling becoming unacceptable and increasingly scarce, new technologies for disposing of waste are becoming essential. Waste disposal facilities in urban environments are viable today. For these opportunities to be taken up, they will need to be identified early on, before development planning, so that they can be incorporated as part of the new development.

Precinct wide master planning

The draft strategy tended to embrace strategy implementation instruments such as state environmental planning policies for priority precincts, ad hoc planning proposals and review of Council's local environmental planning policies. SSROC believes that good development practice would point towards precinct wide master planning being undertaken for development of the scale envisaged by the draft strategy.

Relatedly, the strategy does not indicate that master plan will be required for the redevelopment of Train Stations. There is need for a comprehensive master plan to enable due consideration of commercial, residential and employment outcomes for station redevelopment. In a number of the stations on the Sydenham to Bankstown corridor, such as Bankstown, Campsie, Marrickville, the rail line is a major barrier that separates one part of the CBD or urban centre from the other. The renewal strategy could be an opportunity to improve on access and economic outcomes for local residents.

Corridor background studies and urban design analysis

SSROC appreciates that the Department of Planning and Environment has made publicly available the background specialised studies that informed the strategy. The studies are important to future planning proposal preparations for the 11 precincts on the corridor. It is also necessary that the urban design analysis for the strategy is made available. If this has not already been developed, it is recommended that the Department considers developing one, in collaboration with the three councils that the eleven precincts on the corridor fall within.

Funding

The draft strategy identified the need for community infrastructure, including parks but did not articulate the approach to funding the infrastructure. If Councils are expected to take responsibility for funding the infrastructure, the three councils on the corridor have cause to be concerned in relation to source of funds. This is because Section 94 and Section 94A are severely limited in raising sufficient money for provision of community infrastructure and /or for the upgrade of existing facilities.

The *strategy* could contain one or combination of strategies for raising funds such as:

- a). increase in Section 94A contribution rate
- b). state funding for purchase and upgrade of community infrastructure
- c). buy back program funding from the Crown Lands and agreed repayments period or
- d). use of 'value capture'.

Leveraging on school open spaces and facilities

The draft strategy would like school facilities such as open space to be accessed by the public in order to meet community infrastructure needs.

There is need for three-way discussions and negotiations involving the Department of Planning and Environment, Department of Education and Councils on public access to public and private school facilities and open space. The modalities need to be worked out and concerns and conditions addressed.

Aviation related building height limits

The background study, the *Preliminary Aeronautical Impact Assessment* does not specify maximum building heights near Bankstown Airport. This is required under the Commonwealth Airports Act 1996. It is important that the draft strategy provides certainty of building heights in areas where the Obstacle Limitation Surface are breached, which is apparently the case for the Bankstown CBD.

Transport network and traffic analysis

It is impressive that the draft strategy included an infrastructure plan that considered key infrastructure and the mechanisms to deliver them. The infrastructure included bus corridors, transport interchanges, light rail infrastructure, road, parks and open space improvements. Others include community infrastructure and the mechanisms to deliver them. None the less, there is need to conduct a review of regional transport networks of all the affected councils and the implications of the proposed corridor developments on these and councils in the South District, where residents access job opportunities in the Bankstown and Parramatta localities. The draft strategy made reference to some regional centres connection to Parramatta, Liverpool and Sydney Olympic Parks but provided little or no details.

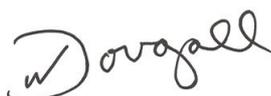
There is little evidence that the *Sydenham to Bankstown Urban Renewal Corridor Strategy* and the related transport network and infrastructure are informed by traffic study or analysis. It is important to undertake the traffic analysis. For example, many roads identified in the strategy are already at traffic capacity. Development potentials could be affected if traffic capacity issues of transport networks are not identified and addressed. For instance, traffic capacity issues and limits of Canterbury Road need to be recognised and addressed.

It is also important that complementary transport infrastructure measures that will assist to efficiently manage public transport use during peak hours are prioritised. For example, there is need for dedicated bus and bicycle lanes and more direct routes along major roads for express services.

Conclusion

Thank you for the opportunity to provide comments on the draft *Sydenham to Bankstown Urban Renewal Corridor Strategy*. If you have any queries please contact Vincent Ogu, Strategic Planning Manager on 8396 3800.

Yours sincerely,



Namoi Dougall
GENERAL MANAGER
Southern Sydney Regional Organisation of Councils