

12 February 2015

Parramatta Road Urban Renewal

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Dear Sir/Madam,

## **New Parramatta Road – Draft Parramatta Road Urban Renewal Strategy 2014**

The Urban Taskforce has reviewed the Draft Parramatta Road Urban Renewal Strategy 2014 ("the draft strategy") and the limited supporting material available for review and we have identified a number of issues worthy of further consideration. Our comments are generally outlined below for your consideration.

### **1. The aims of the draft strategy are too conservative – more jobs and housing are possible**

It is encouraging to observe that the Government is looking at ways to drive planning processes that are focused on the renewal of urban environments such as significant renewal corridors like Parramatta Road. The Government should be congratulated for seeking ways to activate logical renewal areas that cross local government boundaries. This causes added complexity and would benefit from State Government coordination which will hopefully result in tangible and measurable urban renewal outcomes.

Areas such as the Parramatta Road corridor are prime examples of locations that have suffered from inconsistency between the many local governments that control this important and potentially productive urban renewal corridor.

We are encouraged to read that the draft strategy acknowledges that the Parramatta Road Corridor has the potential to deliver a significant number of new jobs and housing. The draft strategy says that:

The NSW Government is aiming for 50,000 new dwellings and 50,000 jobs in the Parramatta Road Corridor.<sup>1</sup>

However, we argue that these aims are far too conservative. In June 2012 the Urban Taskforce released a strategy to transform Parramatta Road into a "Liveability Corridor" providing 100,000 new dwellings and 100,000 new jobs.<sup>2</sup> At the time of drafting that strategy the Urban Taskforce was aided by development advice from members of the Urban Taskforce with significant development sites, ready for redevelopment within the Corridor. We also obtained design advice from a number of highly regarded architects who we were able to demonstrate

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<sup>1</sup> UrbanGrowth NSW 2014, *New Parramatta Road-Draft Urban Renewal Strategy*, p.4.

<sup>2</sup> Urban Taskforce Australia June 2012, *Urban Ideas: 100,000 new apartments and 100,000 new jobs can transform Parramatta Road into a liveability corridor – new approach to mixed use zoning*.

the value and desirability of higher density development as a driver of urban renewal. In all, nine (9) development schemes were outlined, with each scheme providing a viable and varied means of housing delivery and being strategically located along the Parramatta Road Corridor would act as a catalyst to further renewal.

Therefore we urge the NSW Government to take a fresh and bold look at the Parramatta Road Corridor and reconsider its overly conservative aim of only providing 50,000 new jobs and dwellings. The Government should aspire to facilitate the provision of at least 100,000 new dwellings and jobs along the most significant urban renewal corridor in Sydney. Enclosed with this submission is the Urban Taskforce strategy for the Parramatta Road Corridor.

With respect to identified precincts the draft strategy says that by 2031 the:

- Granville precinct would see up to 19,000 new dwellings;
- Auburn precinct would see up to 4,800 new dwellings;
- Homebush precinct would see up to 16,200 new dwellings;
- Burwood precinct would see up to 6,400 new dwellings;
- Kings Bay precinct would see up to 4,200 new dwellings;
- Taverners Hill precinct would see up to 5,500 new dwellings;
- Leichhardt precinct would see up to 2,400 new dwellings; and,
- Camperdown precinct would see up to 2,100 new dwellings.

The draft strategy does not provide justification for these dwelling aims however we say that these aims are far too conservative. These precincts are exceptionally well serviced by development supporting infrastructure and within easy access of employment opportunities. It is inconceivable to think that by 2031 (16 years from now) that the Leichhardt and Camperdown precincts will provide, at a maximum, only an additional 4,500 new dwellings. This is only 280 new dwellings per year across two of the most desirable and accessible precincts within the Parramatta Road Corridor. This does not represent the efficient and economic use of land.

Our fear is that if we are not aspirational and bold in our aims, we will fall short in the delivery of much needed homes and jobs and a once in a lifetime opportunity to transform Sydney will be lost.

***The Urban Taskforce recommends that the Government review the housing and employment aims and publicly exhibit the data used to support the housing and jobs targets.***

## **2. Local government support is expected**

Working across several local government areas relies on coordination and genuine collaboration. We applaud the Government's desire to work with all local governments along the Parramatta Road Corridor. However, we are advised that some local councils are more willing to cooperate than others. We are also aware of a number of local councils being outwardly obstructive and disengaged from the process. We hear that some councils may also be suggesting that they should not be expected to make provisions in their local environmental plans for additional housing and population growth as there newly adopted local environmental plans already provide sufficient zoned land for housing and jobs to meet Government targets.

The Government must show leadership in such instances and continue to encourage cooperation between state and local government. However, the Government must not give in to small minded anti-growth local councils.

***The Urban Taskforce recommends that where local council opposition cannot be satisfactorily resolved in a timely fashion, local planning powers for that portion of Parramatta Road should be removed from the local council and given to the Minister for Planning and Environment.***

### 3. A single Parramatta Road planning authority is required

Notwithstanding the above, consideration must be given to the establishment of a single planning authority that will take control of the strategic planning, local plan making and development approval for proposals within the Parramatta Road Urban Renewal Corridor. This authority could act within the Government's proposed Greater Sydney Commission.

### 4. Development industry urgently needs planning certainty

The investigation and preparation of the draft strategy has been underway for some time. At least two (2) years have passed and the result of this work is the exhibition of the draft strategy. We say that what has been placed on exhibition cannot by any stretch of the imagination be considered a "strategy". What has been placed on exhibition is little more than an information brochure summarising the consultation process and very general aims for the Corridor. The precincts have not been properly defined, the aims not justified, and implementation/actions to move the renewal process forward in a timely manner not articulated. We can only assume that there is much more work that has been completed, but for whatever reason, has not been placed on public exhibition at this time. However, ***in the interest of not wasting any more time, we urge the Government to finalise this strategic part of the planning process and move quickly towards the statutory planning phase.*** That is, bring about the amendment of inconsistent environmental plans so that development may proceed.

Notwithstanding the above, the planning processes completed thus far has made it clear that there is strategic justification for urban renewal along the Parramatta Road corridor. Furthermore, the recently released Metropolitan Strategy for Sydney identifies Parramatta Road as a renewal corridor where a mix of land uses will be encouraged. Hence, ***a process should be established to enable projects to be considered now. Waiting for local government initiated local planning process could result in excessive delays to development.***

Urban renewal and the delivery of housing is reliant upon private sector investment. It is the private sector that will bring about beneficial changes to the private and public domains. This can only happen if development opportunities in all appropriate locations are acted upon, including single or multiple development sites along the Parramatta Road renewal corridor. Development sites, outside of the loosely defined precincts should also be considered. Sites which are able to contribute to the realisation of the strategic aims for the Parramatta Road corridor must be considered by the Government, even if not permitted under current local environmental plans.

Unfortunately under current planning schemes, ideal development sites, in the appropriate locations and of suitable proportions often cannot be developed due to outdated and prohibitive planning controls. The only means of having these controls varied is to seek the support of the local authority to have a planning proposal referred for a gateway determination prior to rezoning. With the removal of ability to have a project declared a Major Development pursuant to Part 3A of the Environmental Planning and Assessment Act 1979, development proponents are forced into a non-appealable rezoning process, controlled by an often ambivalent or hostile local authority. However, seeing that Parramatta Road has been identified as the location for redevelopment, if the development site was to be located within the Parramatta Road corridor and the local authority was not supportive of a proposal, then the rezoning process should be dealt with by the State Government.

For example, until local environmental plans have been brought into line with the renewal strategies for the Parramatta Road corridor, an owner of land should be able to approach the State Government and demonstrate that the development of an appropriately located site would for arguments sake:

- satisfy the objectives of the Parramatta Road Urban Renewal Strategy including:
- the delivery of new housing in an appropriate location; and,
- efficient use of existing and/or planned infrastructure.

If the Government is satisfied that the development proposal is indeed strategy consistent, then the proposal should be determined as if the local plan had been amended to be strategy consistent.

However, by the time the Parramatta Road Urban Renewal Strategy has been finalised, there would have been considerable strategic planning, stakeholder and community consultation, hence, once the strategy has been finalised, there need not be any further consultation. Community engagement is important and community input must be actively sought as part of the strategic planning investigations. The community should be encouraged to review and comment on precinct studies and plans. However, once completed the landowner should be certain in their ability to have a legitimate development proposal determined by the appropriate consent authority without delay brought about by the actions of anti-development, self-interested local governments and activists.

#### **5. Benchmark projects could set the standards**

There are a number of large sites along the Parramatta Road corridor that are ready for development now. Rather than wait a few years until local plans are updated, the State Government should nominate half a dozen benchmark projects, make them state significant and get these important projects underway.

I confirm that the Urban Taskforce supports urban renewal strategies that are economically sound and recognises the important role of private sector investment. We are always willing to work closely with the Government and the relevant stakeholders to provide a development industry perspective on urban renewal strategies and planning controls. I encourage you to review the enclosed Urban Taskforce publication on the renewal of the Parramatta Road Corridor and should you require any further clarification on the content of any of this material, please feel free to contact me on telephone number 9238 3927.

Yours sincerely

**Urban Taskforce Australia**



Chris Johnson AM  
Chief Executive Officer