

Item No: C0224(1) Item 3
Subject: PARRAMATTA ROAD CORRIDOR STAGE 1 PROPOSAL (PRCUTS) - PRELIMINARY ENGAGEMENT OUTCOMES
Authored by: Daniel East – Acting Senior Manager Strategic Planning
Authorised By: Simone Plummer - Director Planning

RECOMMENDATION

1. That Council write to Transport for NSW regarding their submission on the Parramatta Road Planning Proposal to:
 - a) request that TfNSW withdraw their submission as Council does not support the proposed road widenings in the Parramatta Road Corridor which will have significant impacts on the community, environment, heritage and built form and for which no community consultation has been undertaken; and
 - b) seek support for the delivery of TfNSW owned 2 Hay Street, Leichhardt as new open space in Leichhardt precinct in line with the Parramatta Road Corridor Urban Transformation Strategy (PRCUTS).
2. That an urgent meeting with the Secretary of the Department of Planning be convened regarding:
 - a) delays associated with finalising this Planning Proposal given the need to resolve the State Agency submissions;
 - b) seeking certainty that the proposed NSW Government's Housing Reforms will not apply to the Parramatta Road Corridor; and
 - c) seeking support for Council's position on the TfNSW road widenings and delivery of the Hay Street car park as new open space.
3. That following the resolution of issues outlined in (1) and (2) above, a detailed engagement outcomes report be brought back to Council for finalisation of the Planning Proposal.

STRATEGIC OBJECTIVE

This report supports the following strategic directions contained within Council's Community Strategic Plan:

2: Liveable, connected neighbourhoods and transport

EXECUTIVE SUMMARY

The Planning Proposal for Parramatta Road Corridor – Stage 1 for parts of Leichhardt, Taverners Hill and Kings Bay/Croydon Precincts was placed on exhibition from 6 November to 17 December 2023. This report provides a preliminary update on the engagement outcomes and highlights the State agency objections received from Transport for NSW, Sydney Water and Department of Planning & Environment – Environment and Heritage Group (now called Department of Climate Change, Energy, the Environment and Water). Resolution of the issues raised by State Agencies is required in order to advocate for balanced community outcomes in the Inner West.

Of particular concern is the Transport for NSW (TfNSW) submission which sets out their requirement for road widening along the Corridor to provide an on-street rapid transit route

from Burwood to the Sydney CBD. This raises major concerns regarding the proposed impacts on the community and environment, especially as there has been no prior consultation with Council or the community.

Further, the recently released Housing Reforms in December 2023 have major implications for the proposed planning controls in the Parramatta Road Corridor Stage 1, as the proposed State Environmental Planning Policy (SEPP) for Diverse and Well-Located Housing (DWLH) will supersede the Planning Proposal controls and allow equivalent or greater development in all precincts.

The Department of Planning's letter to Council dated August 2023 required that Council finalise this Planning Proposal no later than March 2024. Council has been working towards this timeline and was on track with respect to the engagement activities completed in December 2023. However, due to the concerns raised by various State Agencies and community and release of the NSW Government's State Housing Reforms, this timeline has been jeopardised.

Urgent resolution is required that relies on the intervention of the Department of Planning, Housing and Infrastructure (DPHI) to resolve the matters raised by the State agencies specifically with respect to road widenings of Parramatta Road in the Inner West and supporting the delivery of housing through finalisation of this Planning Proposal.

BACKGROUND

Planning Proposal for Parramatta Road Corridor – Stage 1 begins the incremental realisation of the *Parramatta Road Corridor Urban Transformation Strategy* (PRCUTS) through amendments to the *Inner West Local Environmental Plan 2022* (IWLEP 2022) and associated draft amendments to Development Control Plans (DCPs) in certain parts of Leichhardt, Taverners Hill and Kings Bay/Croydon Precincts by facilitating 1516 new dwellings and 1944 jobs. This Planning Proposal delivers on a key state government priority relating to boosting housing supply and providing affordable housing to meet the 5-year dwelling targets set by the State Government.

The map at Figure 1 shows the extent of NSW Government's PRCUTS (in red) and parts of precincts included in this Planning Proposal (in purple and pink).

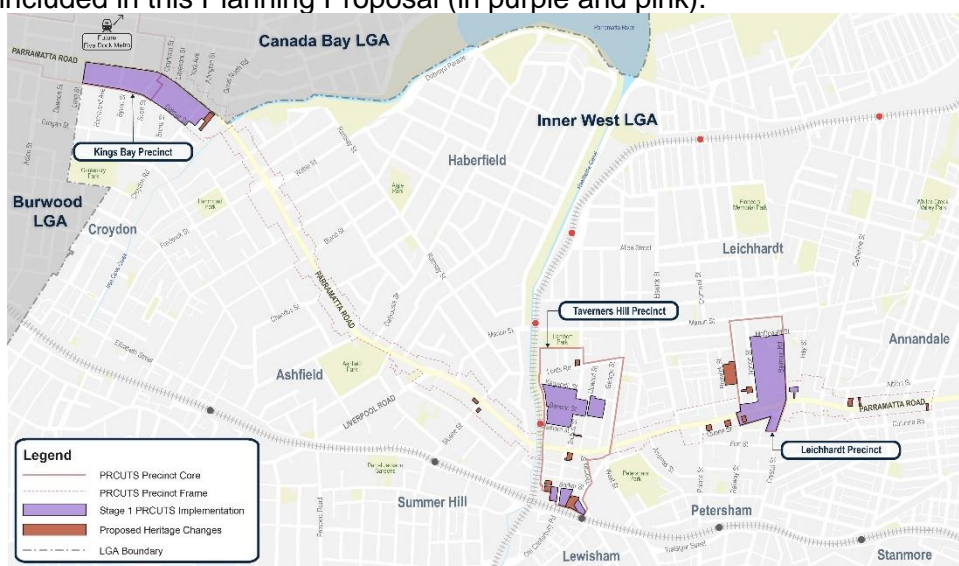


Figure 1 Map of PRCUTS and Planning Proposal extent

At the Council meeting held on 10 October 2023, Council resolved the following in part:

1. That Council endorses a six week community consultation for the Planning Proposal for Parramatta Road Corridor - Stage 1, associated draft amendments to Development Control Plans (DCPs) (Leichhardt, Marrickville and Comprehensive Inner West Development Control Plan 2016 (former Ashfield) and supporting studies with:
 - a) A 'meet the planner' drop-in weekend sessions in each precinct (Leichhardt, Taverners Hill, Kings Bay/ Croydon); and
 - b) A community meeting in each precinct (Leichhardt, Taverners Hill, Kings Bay/ Croydon).
5. That Council receive a final Planning Proposal for endorsement no later than its March 2024 Ordinary meeting.

DISCUSSION

1.0 ENGAGEMENT

Description of Engagement activities

The Planning Proposal, draft DCPs and supporting technical documents were exhibited for 42 days between 6 November – 17 December 2023 in accordance with Council's Community Engagement Framework, the *Environmental Planning and Assessment Act 1979* (EP&A Act 1979) and *Environmental Planning and Assessment Regulation 2021* (EP&A Regulation 2021).

The exhibition material was made available online at Your Say Inner West (YSIW) and 3,693 letters posted to affected properties and those within 75m of the Stage 1 areas. Both landowners and occupiers were notified. The YSIW project page had 7080 views and 3457 visitors.

Community Meetings (8 in total) and 3 Drop-in sessions were carried out as detailed in Table 1. Officers were also available at the Kegworth Public School Christmas Fair on 2 December 2023 to respond to any queries. Community Meetings were organised on weekdays with afternoon and evening sessions. The format consisted of a presentation from officers and a question-and-answer section. Drop-in sessions were held in a conversational format where community members could have a more in-depth discussion with a planner.

Table 1 Community meetings and drop-in sessions - schedule and attendance

Community Meetings

Precinct	Date	Session Time	Attendees
Leichhardt	29 November	3-5pm	17
		6.30-8.30pm	24
	6 December	4.30-6pm	4
Taverners Hill	27 November	3-5pm	18
	30 November	6.30-8.30pm	26
	6 December	7-8:30pm	9
Kings Bay	23 November	3-5pm	8
		6.30-8.30pm	17
Total			123

Drop-Ins

Precinct	Date	Session Time	Attendees
Leichhardt	9 December	10am -12pm	7
Taverners Hill	2 December	10am-12pm 10am-2.00pm ¹	13 4
Kings Bay	25 November	10am-12pm	5
Total			29

¹ Stall at Kegworth Public School Christmas Fair

2.0 PRELIMINARY ENGAGEMENT OUTCOMES AND KEY ISSUES

2.1 High-level Community Feedback

Around 300 submissions were received during the exhibition period - 134 through YSIW, 133 by direct email, 38 letters, and 2 submissions via the DPHI Planning Portal. The submissions included the petition from Lungs of Leichhardt with 1879 signatures opposing the proposed changes in Taverners Hill precinct.

Submissions in favour generally supported the approach to revitalisation of the Parramatta Road Corridor and the proposed changes to planning controls to facilitate the delivery of much needed housing in the Inner West.

Submissions opposing the Proposal raised concerns about potential environmental and social impacts, traffic impacts, car parking, loss of character, inadequate response to market and affordable housing supply, lack of supporting infrastructure and various issues relating to the proposed heritage changes.

An overview of the comments in the submissions is discussed below. Note that this is a high-level summary of the submissions and that a detailed analysis of the submissions is currently underway which will inform an Engagement Outcomes Report to be reported to Council in 2024.

- a) **Stage 1 Implementation Area** – Submissions raised concerns regarding the selection of the Planning Proposal Stage 1 Area and were more in support of future development in areas directly along Parramatta Road including on employment and underutilised land.
- b) **Proposed changes to planning controls** – Respondents were generally in favour of the proposed incentives approach and the potential to deliver better built form, sustainability, and amenity outcomes for the area. Concerns were raised about the shift towards medium density residential zoning and increased density in the planning controls. Comments also discussed the potential loss of character to existing streetscape and heritage.
- c) **Proposed heritage controls** – Submissions presented mixed views towards the proposed heritage controls. Some supported the proposed heritage conservation areas as these ensure the protection of character and quality areas. Whereas some submissions questioned the proposed heritage changes as these are perceived to hinder development, contrary to the aim of delivery of housing. There were objections to a few proposed heritage items as these were perceived to have no architectural or social value.

- d) **Built form impacts** – Issues relating to built form impacts were primarily concerned with overshadowing or privacy impacts on existing properties.
- e) **Housing** – Overall, respondents agreed that there is an immediate need to deliver more housing supply. Mixed views were provided as to whether Council’s proposal would be able to facilitate enough private and affordable housing given the current housing crisis context. Comments also raised the need to cater for more affordable and family-sized homes.
- f) **Traffic and transport** – Submissions strongly supported improvements to sustainable transport options and the shift towards reduced private vehicle use to minimise traffic along Parramatta Road and surrounding streets. However, there were concerns that there has been no commitment or action from State Government to improve public transport infrastructure and services along Parramatta Road. Mixed views were received regarding the approach to maximum car parking rates with some respondents supporting the concept of maximum car parking rates whereas others opposed it, questioning whether the proposed provisions would alleviate existing and future car parking issues.
- g) **Community infrastructure** – Submissions raised support for the proposed local provision to ensure developers make satisfactory state/regional infrastructure contributions to deliver more social infrastructure and community facilities such as schools and hospitals. Some submissions questioned whether the proposed community infrastructure was adequate given the forecast growth in the area.
- h) **Open space and public domain** – Submissions were generally in support of improved public amenity and new open space proposed within the Corridor. However, some respondents raised concerns regarding lack of existing open space and suggested that a greater provision of public open space should be provided.
- i) **Environmental impacts** – A number of submissions were received regarding concerns around adverse biodiversity impacts on native wildlife and habitat in areas adjacent to the GreenWay in the Taverners Hill precinct. Loss of mature trees and tree canopy cover was also raised as a related issue that would worsen climate change impacts and the urban heat island effect. Submissions also raised concerns regarding exacerbation of flood impacts in the Taverners Hill precinct.
- j) **Sustainability controls** – Submissions generally support the proposed higher energy and water targets, sustainable transport modal shift and mechanisms to increase tree canopy and greening. Concerns were raised as to whether the proposed sustainability targets could be expanded beyond energy and water consumption.
- k) **Impacts on existing community** – Submissions supported various positive social impacts arising from the proposed changes, including improvements to urban amenity, liveability, public spaces, and walkability. Issues were raised in relation to perceived loss of housing and potential short to long-term disruption impacts to the existing community. Submissions also raised concerns regarding land acquisitions and impacts on existing residents who may be forced to sell their homes by developers.

- l) **Property values and rates** – Submissions discussed the impacts on property valuation, raised concerns regarding increase in property rates and other associated costs, and impacts on existing residents.
- m) **Economic impacts** – Respondents generally supported moves to revitalise the economic areas along the Parramatta Road Corridor, including the potential to create new jobs in the area. However, some views expressed concern that new jobs were not considered for all precincts in the Proposal. Submissions also commented on the economic feasibility of the proposal, suggesting that the proposed FSRs were too low to deliver housing, in particular affordable housing outcomes.

A detailed analysis of the submissions is underway and where necessary, changes will be recommended to the Planning Proposal and draft DCPs. However, this work hasn't been completed yet as major issues were raised in several State agency submissions (refer to section 2.2) and the proposed Housing Reforms currently on exhibition (refer to section 3) all of which require resolution. It is also likely that some of the proposed changes required by State agencies, unless amended, will require the proposal to be re-exhibited as discussed in the below section.

2.2 State agency submissions

The Planning Proposal was referred to several State Government agencies as per the Gateway determination conditions. Council has received responses from 13 agencies so far and is still awaiting responses from the following state agencies:

- Commonwealth Department of Infrastructure, Transport, Regional Development and Communications
- Environment Protection Agency
- Ausgrid

A copy of TfNSW submission is provided in Attachments 1 & 2. All other state agency submissions are provided in Attachment 3.

The following key issues have been raised by State Government agencies:

- a) **Proposed road widening** – TfNSW's submission identifies road widening along the entire Parramatta Road Corridor in the Inner West LGA from Crystal Street, Petersham to Lang Street, Croydon. TfNSW have nominated setbacks of 0.5-10m (including 6m offset – refer Attachment 2) with the land to be dedicated to TfNSW through identifying relevant parts of the sites as '**land reserved for acquisition**' and rezoning this land to SP2 Infrastructure. A total of 196 properties have been identified for road widening which will have a significant impact on the community. Council officers do not support road widening for the following reasons:

- *Land acquisition* - the TfNSW submission states "the draft plans are indicative and will be subject to further investigations and the necessary assessments, approvals and funding". Unless TfNSW were to propose compulsory land acquisition along the corridor, road widening/land dedication would only occur in a piecemeal manner at the Development Application stage and could take decades to achieve, as at this stage there is no business case for a planned public transit route or funding identified to deliver such a route.

It can be anticipated that, based on international travel patterns and transport technologies trends, the widening would prove irrelevant within 2 decades as the mode shift to sustainable transport continues and guided vehicle technologies become the norm.

- *Contrary to vision for revitalisation of the Corridor* - Widening of Parramatta Road runs counter to many of the State Government's existing policies which focus on the Corridor's revitalisation. This revitalisation requires improvements to public and active transport and dissuasion of private vehicle dependency.

While the widening may be for the "purpose of public transport enhancement", unless this is done within the existing carriageway, traffic flows will also increase significantly and result in similar issues to those currently being experienced on Victoria Road, Rozelle, where induced demand has resulted in increased traffic congestion and major community backlash.

Council strongly supports improvements to public transport and provision of on-street rapid transit along Parramatta Road, but this must be within the existing road carriageway, without impacting the adjacent properties and must be delivered within a reasonable timeframe to support the development growth in the corridor.

- *New and emerging technologies* - TfNSW does not take into account new and emerging public transport technologies which would be suited to the Corridor. It can be anticipated that, over the long time frame that it would take for such a widening to be completed, public transport would be either guided or fully autonomous. Such transport would readily operate in narrower lanes than existing buses.

Additionally, private cars and shared cars for that timeline would also be guided or autonomous and require narrower lanes.

Consequently, it is considered that any proposal to widen Parramatta Road for transport or traffic purposes is an antiquated approach aimed at reinforcing existing travel patterns and technologies rather than planning for the future.

- *Physical and psychological barrier* - The widening of Parramatta Road would reinforce the physical and psychological barrier that already exists, deterring pedestrian friendly access across it and visually altering any human scale that could be achieved. This is contrary to the vision of PRCUTS which seeks an improved urban environment.
- *Impacts on Heritage* - TfNSW maps ignore the existing Heritage Conservation Areas (HCAs) along the corridor. The proposed road widening in the HCAs would require the buildings to be demolished resulting in the loss of heritage facades and awnings of buildings along the southern side of Parramatta Road. The map shown in Figure 2 is an example of proposed road widening along the Parramatta Road HCA in Leichhardt near Crystal Street (up to 4.4m). In addition, TfNSW's submission has opposed the proposed heritage items (such as the one in yellow below) and ignored the heritage significance of these sites as noted in the Heritage Study accompanying the Planning Proposal stating that these would hinder the provision of proposed road widenings.

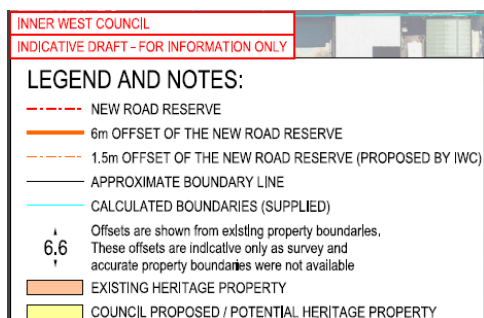


Figure 1 Indicative Draft Road Widening Plans for Parramatta Road and Crystal Street, Leichhardt from TfNSW Submission

- Further loss of amenity* - widening of Parramatta Road and increased traffic will worsen the amenity along Parramatta Road, exacerbate the air pollution, noise and health impacts and will not support housing opportunities, a key objective of PRCUTS.
- No prior consultation* - the proposed road widenings by TfNSW are substantial and inconsistent with the Council's messaging to the community throughout the public exhibition that no properties will be acquired through this Planning Proposal.

If TfNSW's proposed road widenings were to be considered, new studies will be required to address any impacts to built form, heritage and traffic. The Planning Proposal will also have to be re-exhibited as these are substantial changes and community input will be required.

- b) Proposed new open space in Leichhardt** – The Planning Proposal rezones the TfNSW owned car park at 2 Hay Street, Leichhardt from E1 Local Centre to RE1 Public Recreation, consistent with PRCUTS. However, TfNSW have raised concerns regarding the proposed rezoning and associated removal of the Floor Space Ratio (FSR) control. TfNSW have stated they require Council to purchase this property at market value based on the current zone and FSR.

Given that Council is implementing the Section 9.1 Local Planning Direction for the NSW Government's PRCUTS, it is unreasonable for TfNSW to impose this requirement on

Council to purchase this existing government asset that is identified as open space in PRCUTS (see below map in Figure 3).

Figure 11.10: Leichhardt Open Space and Active Transport

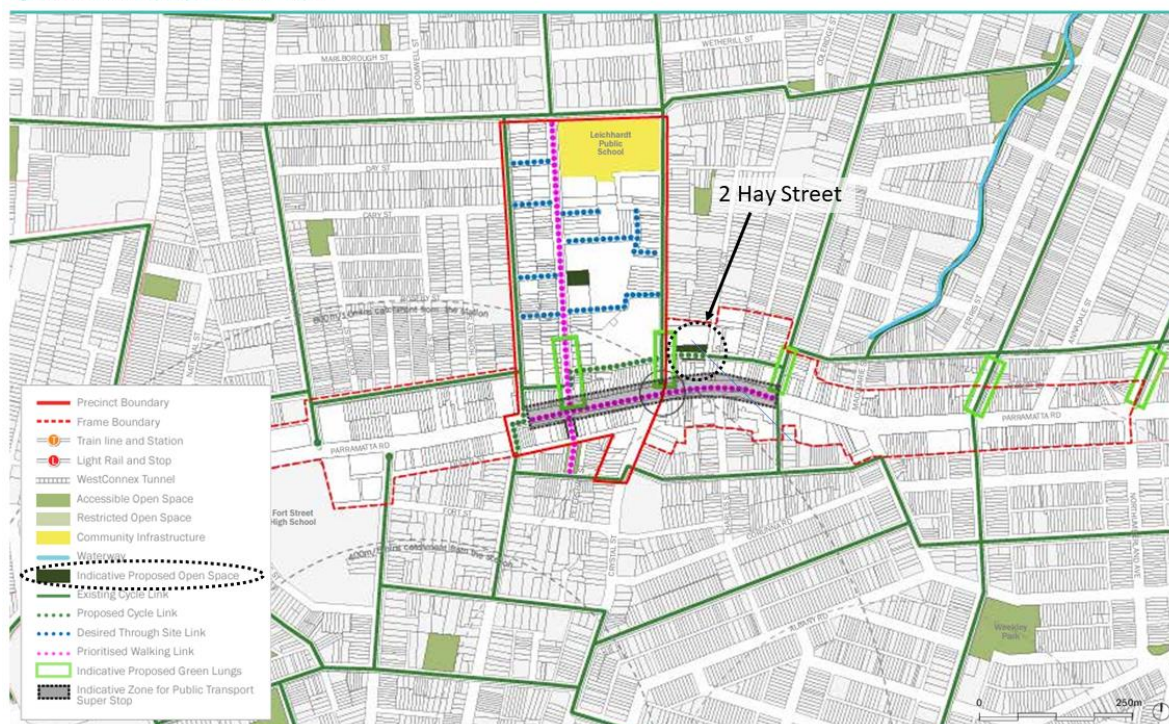


Figure 3 Leichhardt Open Space and Active Transport Map indicating the proposed open space at 2 Hay Street, Leichhardt (PRCUTS Planning and Design Guidelines 2016)

Council's support is sought to advocate that the TfNSW owned Hay Street carpark site be provided as public open space at no cost to Council given that:

- It is consistent with the State Government's Parramatta Road Corridor Urban Transformation Strategy
- The level of shortfall of open space infrastructure in Leichhardt precinct as noted in [Inner West Recreation Needs Study Update 2021](#)
- There is substantial uplift proposed through PRCUTS and the State Government's Housing Reforms in Leichhardt that will create demand for additional open space.
- It would facilitate the only recreational area along an important future cycleway corridor that runs East-West to the Sydney CBD (see Figure 3).

A potential solution to delivering this as open space would be for funding by DPHI through the State/ Housing Productivity Contributions which will be collected through future State Planning Agreements. Note: that this is not identified for acquisition by Council as an item in the Infrastructure Contributions Plan and there is already an existing shortfall in funding to provide local infrastructure.

The site could be identified as "**RE1 Public Recreation - Regional Open Space**" which in accordance with the provisions under clause 5.1(2) of the *Inner West Local Environmental Plan 2022* will require "the corporate constituted under Section 2.5 of the Act" i.e. NSW Government agency to retain the ownership of the site and ultimately deliver the open space.

- c) **Biodiversity** – Environment and Heritage Group of DPHI have requested additional information to assess and address any adverse impacts of the proposal for the Taverners Hill precinct on the Large Bent-wing Bat (*Miniopterus orianae oceanensis*), a threatened species under the Biodiversity Conservation Act 2016.

- d) **Water supply** – Sydney Water have requested an updated timeline and annual dwelling and job forecast for the Planning Proposal, noting capacity issues to service water in the Taverners Hill precinct. Growth data for number of dwellings in each Financial Year will be taken into consideration by Sydney Water when reviewing the potential network staging upgrades. Council officers are liaising with DPHI to provide this information to Sydney Water.

The above State agency submissions raise significant concerns, and the proposal cannot be finalised until the above concerns are resolved.

3.0 IMPLICATIONS OF HOUSING REFORMS

The recently released Housing Reforms have significant implications on Parramatta Road Planning Proposal as also discussed in Council's submission on the proposed Diverse and Well-Located Housing (DWLH) State Environmental Planning Policy (SEPP).

A comparative analysis has been undertaken of the Parramatta Road Corridor Planning Proposal and the controls proposed in the DWLH SEPP as per Table 2. The entire Planning Proposal area is affected by the proposed Housing Reforms.

Table 2 below shows that, with the exception of heights in parts of the Leichhardt Precinct, the height of building (HOBs) and Floor Space Ratios (FSRs) under the proposed DWLH SEPP are greater than Council's Planning Proposal.

Table 2 Comparison between the incentive HOBs and FSRs of Council's PP and the proposed DWLH SEPP

	Planning Proposal		DWLH Proposal	
	HOB	FSR	HOB	FSR
Leichhardt Precinct				
Norton St - E1 zone	20.5m, 23.5m, 27m, 32m	1.9, 2.7, 3.0	21m	3.0
Balmain Road – R3 zone	15.5m, 21.5m, 25m	1.4, 1.5, 1.9, 2.1, 2.3	21m	3.0
Parramatta Road - E1	23.5m	3.0	21m	3.0
Crystal Street – R3	18.5m	2.2	21m	3.0
Taverners Hill				
West Leichhardt – R3	12m, 15.5m, 21.5m	0.9, 1.2, 1.4	21m	3.0
Lewisham South -R3	12m, 15.5m, 18.5m	1.0, 1.2	21m	3.0
Kings Bay/Croydon				
Dalmar Street – R3	12m	1.0	21m	3.0
Croydon Road – R3	15.5m	1.3	16m	2.0

Further, this Planning Proposal is premised on an incentives proposition whereby development uplift also achieves broader policy positions and supports the implementation of PRCUTS. For example:

- appropriate development pattern and high-quality built form in terms of bulk, massing, height, separation, setbacks, amenity and modulation
- provide an active street frontage
- higher building performance targets

- mechanisms to reduce urban heat
- maximum parking rates to support sustainable transport modes, minimise traffic congestion and reduce private car dependency

The DWLH proposal, if implemented in the Parramatta Road Corridor, will result in larger buildings with less amenity as it proposes higher FSRs and HOBs than the Planning Proposal controls without any incentives criteria.

For example, the Planning Proposal seeks to facilitate 3-4 storeys residential development along Beeson, Hathern and Kegworth Street in the north of Taverners Hill precinct. However, the proposed SEPP (which will supersede the proposed LEP controls) will result in 6 storey developments in this area. It is worth noting that the proposed SEPP would allow 6 storeys development in Taverners Hill precinct (even without this planning proposal) as it is zoned R1 General Residential which allows residential flat buildings. For further information, Refer to Council's detailed submission.

Another example where the proposed SEPP changes will result in reduced amenity outcomes is where the proposed DWLH tree canopy targets and affordable housing contributions are lower than those in the Parramatta Road Planning Proposal as per Table 3.

Table 3 Canopy cover and affordable housing comparison

	PRCUTS Planning Proposal	DWLH SEPP
Tree canopy targets R3 (depending on site area)	<ul style="list-style-type: none"> • < 650m² – 15% • 650-1500m² – 20% • 1500-3000m² – 25% • >3,000m² – 35% <p>Note: the PRCUTS canopy targets are based on PRCUTS Planning and Design Guidelines and Sustainability Implementation Plan and DPHI's Greener Neighborhoods Guide.</p>	<ul style="list-style-type: none"> • less than 650m² – 15% • 650-1500m² – 15% • 1500-3000m² – 20% • >3,000m² – 20%
Affordable Housing	2% Affordable Housing contributions	No targets proposed in the DWLH

DWLH proposal will fail to deliver the vision and objectives of PRCUTS. It also fails to justify how it will deliver better outcomes than those envisaged in PRCUTS as required by the Section 9.1 Local Planning Direction 1.5.

Council's submission on the State Reforms requests that the Parramatta Road Corridor be excluded from the application of the proposed SEPP. However, if this recommendation is not accepted by the DPHI, the finalisation of Council's Planning Proposal will be redundant as it will be superseded by the proposed SEPP which proposes larger developments than those in the Planning Proposal.

Further, there are also concerns that if the Planning Proposal proceeds with changes such as rezoning R2 Low Density Residential to R3 High Density Residential in Dalmar Street, there could be indirect consequences of the proposed SEPP which would implicitly allow 4-6 storeys in this area as opposed to the proposed 3 storeys in the exhibited Planning Proposal.

The proposed built form outcomes in DWLH are larger and contrary to Council's response to individuals directly and at community meetings during the consultation process. Consequently,

if this Planning Proposal proceeds without certainty regarding the application of DWLH, there may be indirect consequences associated with the State Housing reforms and a perception that Council has misled the community on development potential.

It is recommended that DPHI provide assurance to Council that the proposed State Reforms will not apply to the Parramatta Road Corridor.

CONCLUSION

Given the above issues raised in community and State Government submissions and considering the implications of the proposed State Government Reforms in the Parramatta Road Corridor, there are significant issues that require resolution in order to progress the Planning Proposal.

Escalation of these concerns with DPHI to resolve the State agency submissions and seek assurance regarding the exclusion of Parramatta Road Corridor from the proposed Housing Reforms is underway.

FINANCIAL IMPLICATIONS

There are no financial implications associated with the implementation of the proposed recommendations outlined in the report.

ATTACHMENTS

1. [↓](#) TfNSW Submission Letters
2. [↓](#) TfNSW Road Widening Plans
3. [↓](#) State agency submissions combined

Transport for NSW



Mr Gainsford
General Manager
Inner West Council
PO Box 14
Petersham NSW 2049

Sent by email: council@innerwest.nsw.gov.au

Objection to rezoning of 2 Hay Street Leichhardt (PP-2022-1921)

27 November 2023

Dear Mr Gainsford,

This letter is in response to Inner West Council's Planning Proposal (PP) titled 'Parramatta Road Corridor Implementation Stage 1' (PP-2022-1921) which is currently on exhibition.

The PP aims to facilitate the vision and strategic objectives of *Parramatta Road Corridor Urban Transformation Strategy* (PRCUTS) through a range of amendments to the *Inner West Local Environmental Plan 2022*.

Transport for New South Wales (Transport) owns surplus land located at 2 Hay Street, Leichhardt also known as Lot A DP348040 (Subject Lot). The PP proposes to rezone the Subject Lot from E1 Local Centre to RE1 Public Recreation and remove the floor space ratio (FSR) standard applicable to the Subject Lot.

Transport objects to the proposed rezoning and the FSR amendments for the Subject Lot as they are inconsistent with Direction 5.2 of s9.1 Ministerial Directions under the *NSW Environmental Planning and Assessment Act 1979*.

Under Direction 5.2, a proposal must not create, alter or reduce existing zonings or reservations of land for public purposes without the approval of the relevant public authority and the Planning Secretary or delegate. The proposed amendments are inconsistent with this Direction as the agency has not approved the proposed rezoning of the Subject Lot.

The Gateway Assessment Report issued by the Department of Planning and Environment in October 2022 also stated that the proposal to rezone the Subject Lot is inconsistent with Direction 5.2 and recommended a Gateway condition requiring Council to consult with Transport during exhibition regarding this proposed rezoning.

The PP states that the Subject Lot *"is not required to be reserved for public purposes as it is already in NSW Government's possession"*. As Transport has previously advised Council, the Subject Lot is surplus to Transport's infrastructure needs and is to be divested on the open market. This is also consistent with the NSW Government's priority to increase housing supply, noting the current zoning permits shop top housing.

The PP also states that the Subject Lot *"could be transferred or leased to Council for the use of open space"*. As per NSW Treasurer's Directions, sale, transfer or lease of government assets must occur at market value.

For the reasons outlined above, Transport seeks amendments to the PP prior to its finalisation to either:

1. Remove the proposed RE1 Public Recreation zoning and reinstate the existing zoning (E1 Local Centre) and associated development standards, or
2. Retain the proposed RE1 Public Recreation zoning and identify the acquisition authority; which must be on the basis of market value, also confirming the acquiring authority has the intent and means to acquire the land from Transport within a reasonable timeframe.

Transport would appreciate the opportunity to meet with Council without delay to discuss this matter and resolve a way forward.

Please contact Kylie Clarke at Kylie.Clarke@transport.nsw.gov.au at your earliest convenience to arrange a meeting to discuss further.

Yours sincerely,



Mark Slater
Executive Director Property Group
Infrastructure & Place
Transport for NSW

Transport for NSW

13 December 2023

TfNSW Reference: SYD23/01252/01
DPE Reference: PP-2022-1921

Peter Gainsford
General Manager
Inner West Council
PO Box 14,
Petersham NSW 2049



Item 3

RE: PARRAMATTA ROAD CORRIDOR STAGE 1 IMPLEMENTATION – PLANNING PROPOSAL - PUBLIC EXHIBITION

Dear Mr Gainsford

Thank you for referring the Planning Proposal to Transport for NSW (**TfNSW**) on 7 November 2023. TfNSW notes the proposal seeks to amend the Inner West Local Environmental Plan 2022 (**IWLEP**) to implement Stage 1 of the Parramatta Road Corridor Urban Transformation Strategy 2016 (**PRCUTS**) in parts of the PRCUTS Precincts of Leichhardt, Taverners Hill and Kings Bay. We note consultation is being undertaken with TfNSW under Condition 2 of the Gateway Determination dated 20 October 2022.

Detailed comments on the planning proposal are provided in **Attachments A and B** for Council's consideration prior to finalising the amendments to the IWLEP.

TfNSW notes that the planning proposal area has been identified to address the Department of Planning and Environment's (**DPE**) requirement that a short to medium term shortfall of up to 1,600 dwellings in the Inner West be met. The planning proposal brings forward development of up to 1,516 dwellings in only certain parts of the Inner West's PRCUTS precincts to initiate the incremental transformation of the Parramatta Road Corridor (**Corridor**). It is understood that opportunities for additional growth beyond this planning proposal area will be delivered through future Council-led LEP amendments.

TfNSW highlights that it is investigating potential transport options for the Corridor in line with the broader future transport network, which includes this geographical study area. TfNSW is currently working on a plan for potential short, medium and long term options to enhance public transport and support the corridor's urban transformation. Council has previously been consulted and will continue to be consulted on these options in due course.

Thank you for the opportunity to provide comments on the planning proposal. Should you have any questions or further enquiries in relation to this matter, please contact, Dipen Nathwani – Senior Land Use Planner via email: development.sydney@transport.nsw.gov.au

Yours sincerely,

Carina Gregory
**Senior Manager Strategic Land Use (Eastern)
Land Use, Network & Place Planning**

4 Parramatta Square, 12 Darcy Street, Parramatta NSW 2150
PO Box 973, Parramatta CBD NSW 2124
P 131782
W transport.nsw.gov.au

1

Attachment 1

Appendix A - Future Transport Improvements on Parramatta Road Corridor

Direction 1.5 - PRCUTS issued by the Minister for Planning on 9 December 2016 (**Direction**) includes that a planning proposal must:

- a. give effect to the objectives of this Direction,
- b. be consistent with the Strategic Actions within the *Parramatta Road Corridor Urban Transformation Strategy* (November 2016),
- c. be consistent with the *Parramatta Road Corridor Planning and Design Guidelines* (November 2016) and particularly the requirements set out in Section 3 Corridor-wide Guidelines and the relevant Precinct Guidelines,
- d. be consistent with the staging and other identified thresholds for land use change identified in the *Parramatta Road Corridor Implementation Plan 2016 – 2023* (November 2016),
- e. contain a requirement that development is not permitted until land is adequately serviced (or arrangements satisfactory to the relevant planning authority, or other appropriate authority, have been made to service it) consistent with the *Parramatta Road Corridor Implementation Plan 2016 – 2023* (November 2016),
- f. be consistent with the relevant District Plan.

The PRCUTS states:

‘Transport for NSW is committed to delivering an on-street rapid transit system to support the shared vision for the growth of the Parramatta Road Corridor.

The Parramatta Road Corridor on-street rapid transit route, from Burwood train station to the Sydney CBD, will service five of the Precincts along the Parramatta Road Corridor (Burwood- Concord, Kings Bay, Taverners Hill, Leichhardt and Camperdown).’

The Parramatta Road Corridor Urban Transformation - Planning and Design Guidelines dated November 2016 provide traffic and transport requirements at Section 3.6, and key considerations when planning for public transport at Figure 3.3 and Figure 3.5.

The traffic and transport requirements at Section 3.6 of the guidelines provide:

- ‘c. Improve public and active transport quality, access, and connectivity to and within Precincts and Frame Areas.*
- d. Support an improved urban environment with areas designated for greater levels of street activity.*
- e. Facilitate local access needs for new development to support the needs of residents and businesses.*
- f. Encourage travel behaviour change to discourage car use and support more sustainable travel choices such as public and active transport.*
- g. Within the Rapid Transit Indicative Zone, work with Transport for NSW to integrate bus stops and rapid transit stops into the streetscape, including:*
 - i. ensuring the safety and amenity of transport users and pedestrian passers-by*
 - ii. ensuring safe, efficient, and reliable public transport operations*
 - iii. providing convenient street crossings, canopy /awning structures, seating, public lighting, real-time travel information, bins, and other required facilities.*

TfNSW notes the planning proposal proposes 1.5m landscaped setback on Parramatta Road in the Kings Bay precinct in lieu of the 6m Green Edge setback envisaged in the PRCUTS. The planning proposal makes no such setback allowance in the Leichhardt and Taverners Hill precincts.

Council has justified this inconsistency in the width of green edge setback in Kings Bay precinct by stating that:

- *“The 6m setback is envisaged to provide walking and cycling links along Parramatta Road. Council’s Transport Team has advised that these links should be accommodated within the existing carriageway. Relying on all developments to be developed in a coordinated manner and provide 6m width for walking and cycling is unrealistic.*
- *Instead of the 6m front setback, rear setback of 9m is proposed to protect the amenity of residents along Dalmar Street.*
- *Reduced 1.5m setbacks would soften the built form and provide opportunities for deep soil and landscaping.”*

The ability to deliver the Parramatta Road Corridor on-street rapid transit route, from Burwood to the Sydney CBD, and any other future public transport and/or active transport enhancements will require road widening to meet current safety standards.

Some of this widening could potentially be accommodated within the proposed 1.5m landscaped setback on Parramatta Road in the Kings Bay precinct of the planning proposal. The draft indicative road widening plans (**Attachment C**) show the extent of variable road widening ranging between 0.1m to 5.0m from the existing property boundaries. We note these draft plans are only indicative, and this will be subject to further investigations and the necessary assessments, approvals, and funding.

TfNSW has tried to avoid widening at the properties that are currently heritage-listed or are proposed to be heritage-listed on the Corridor as part of the Proposal. However, there are certain locations where the proposed widening would invariably affect the heritage listed properties (existing or proposed). We request Council not pursue proposed heritage listing of those affected properties on the Corridor.

TfNSW is of the view that the request for road widening to deliver the future public transport and/or active transport enhancements is consistent with the Planning Direction issued by the Minister for Planning. TfNSW therefore requests that the land identified for road widening is reserved for a public purpose and rezoned as SP2 Infrastructure zone in the Planning Proposal. This request is made in accordance with *Local Planning Direction 5.2 - Reserving Land for Public Purposes*.

It is recommended that Council undertakes consultation with TfNSW and DPE on the way forward on this matter prior to finalising the planning proposal.

Attachment B – General Comments on the Planning Proposal

No.	Section/Page ref	Comment/suggestion
1	Planning Proposal Report, dated November 2023 Figure 1, page 4 and Figure 3, page 9	TfNSW land at 2 Hay Street, Leichhardt in Figure 1 and Figure 3 appears to be shown in brown colour which has been used to indicate proposed heritage changes. However, it is understood that the land is proposed to be zoned RE1 Public Recreation. The figures should be updated accordingly.
2	Planning Proposal Report, dated November 2023 Part 2 – Explanation of provisions, page 18	<p>The planning proposal seeks to rezone TfNSW-owned surplus land located at 2 Hay Street, Leichhardt (Lot A DP348040) from E1 Local Centre to RE1 Public Recreation and remove the Floor Space Ratio (FSR) standard applicable to the site to create a new public open space.</p> <p>TfNSW objects to the proposed rezoning and the FSR amendments for the subject land as they are inconsistent with Direction 5.2 of s9.1 Ministerial Directions under the <i>NSW Environmental Planning and Assessment Act 1979</i>.</p> <p>TfNSW's Property Group (Infrastructure & Place) has issued a separate submission to Council on 28 November 2023 objecting to the proposed rezoning. Copy of the submission is attached in Attachment D.</p>
3	Planning Proposal Report, dated November 2023 Table 17, page 69	<p>The report states that “<i>Council looks forward to working with the State Government to address funding requirements for local infrastructure and services in the Corridor. Especially, the commitment that any Housing & Productivity funds collected from this Planning Proposal area will be reinvested in this area to address funding gap of local and state infrastructure and services.</i>”</p> <p>TfNSW is not aware of any such commitment being made and defers to DPE to provide appropriate consideration to this request.</p>
4	Planning Proposal Report, dated November 2023 Table 18, page 78	<p>The report states that “<i>This Planning Proposal fully supports and implements PRCUTS vision of a revitalised Parramatta Road Corridor, which is dependent on the provision of improved public transport (on-street rapid transit system) and reduced reliance on private cars.</i>”</p> <p>TfNSW acknowledges the PRCUTS vision of on-street rapid transit system, and by requesting road widening for the future active and public transport improvements on Parramatta Road as part of this submission, seeks to ensure that adequate width is provided for development of any future options for a compliant on-street rapid transit route, active travel and amenity improvements along the Corridor.</p>

No.	Section/Page ref	Comment/suggestion
5	Appendix 1: Proposed LEP Maps	<p>The existing land zoning maps for Leichhardt and Kings Bay precincts indicate that Parramatta Road is currently zoned SP2 Infrastructure. However, the proposed land zoning maps do not indicate retention of the SP2 Infrastructure zone. Similarly, existing land zoning map for Taverners Hill precinct indicates that Tebbutt Street is currently zoned SP2 Infrastructure. However, the proposed land zoning map does not indicate retention of the SP2 Infrastructure zone.</p> <p>Transport requests clarification of this matter prior to the finalisation of the Planning Proposal.</p>
6	Appendix 2B: Inner West Council's Draft Structure Plan 2020 (November 2023)	<p>The proposed Land Reservation Acquisition map for Leichhardt precinct indicates that 2 Hay Street, Leichhardt, currently owned by TfNSW, is identified for acquisition. However, it is unclear which agency has been nominated as an acquisition authority. Furthermore, the proposed Land Reservation Acquisition map appears to be inconsistent with the planning proposal report (page 119) which states that <i>"This land is not required to be reserved for public purposes as it is already in NSW Government's possession. This could be transferred or leased to Council for the use of open space."</i></p> <p>Transport requests clarification of this matter prior to the finalisation of the Planning Proposal</p>
7	Appendix 2B: Inner West Council's Draft Structure Plan 2020 (November 2023)	<p>4 Liverpool Road, Summer Hill (Lot 10 DP702101) is TfNSW owned land that was resumed and declared a Public Reserve. The Public Reserve is placed under the care and control of Council by Government Gazette No. 73 of 26 April 1985.</p> <p>The proposed Land Reservation Acquisition map for Taverners Hill precinct indicates that this land is identified for acquisition. However, it is unclear which agency has been nominated as an acquisition authority or the purpose of the proposed reservation.</p> <p>Transport requests clarification of this matter prior to the finalisation of the Planning Proposal.</p>

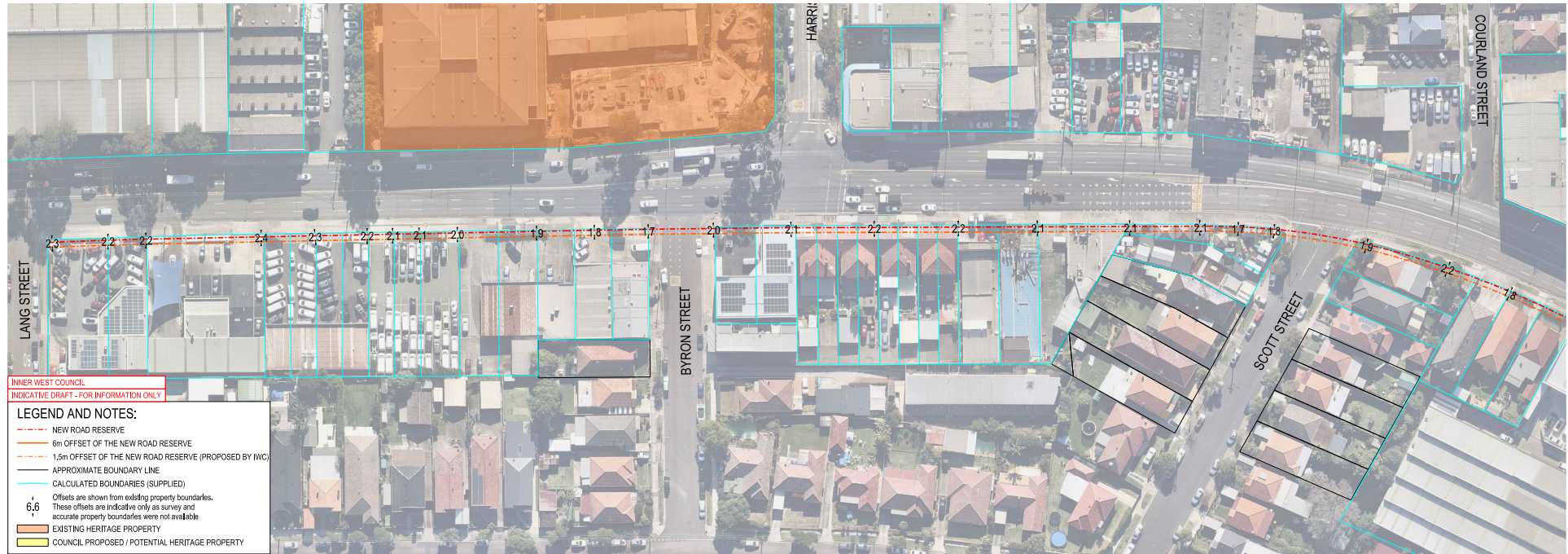
No.	Section/Page ref	Comment/suggestion
8	Appendix 11: Parramatta Road Corridor Stage 1 – Justification Study Section 6.9 of Appendix 11	<p>TfNSW notes that the planning proposal is supported by a precinct-wide traffic and transport study that involved the development of a hybrid (microscopic/mesoscopic) traffic simulation model using AIMSUN. The justification study states that <i>“This traffic report also identifies numerous road network capacity increases / road widenings as part of the modelling scenarios. These road widenings are not supported by Council officers if related to increasing road capacity to accommodate additional car movements, as it directly conflicts with Council’s numerous objectives relating to increasing liveability and sustainability.”</i></p> <p>TfNSW reiterates previous advice provided to Council that the above microscopic/mesoscopic model that encompasses a large geographical boundary is not required for the agency’s transport assessment for the Kings Bay, Taverners Hill and Leichhardt planned precincts within PRCUTS that consists of an uplift of 1,516 potential additional dwellings across these three precincts over the short to medium term.</p> <p>TfNSW’s submission to the planning proposal is therefore based on the review of the planning proposal report, and other supporting studies, including but not limited to the PRCUTS Phase 2 Rapid Intersection Assessment of corridor performance (prepared by Turnbull Engineering for DPE), with a copy provided to Council in April 2022.</p>
9	Appendix 14 – Draft Leichhardt Infrastructure Schedule (March 2022)	<p>The draft infrastructure schedule identifies upgrading Balmain Road/Parramatta Road intersection to improve pedestrian crossing opportunities. Given that marked pedestrian crossings already exist on three (3) approaches of the intersection, it is understood that this upgrade envisages providing pedestrian crossing on the remaining approach i.e. Parramatta Road (east of Crystal Street and Balmain Road).</p> <p>It should be noted that a two-stage pedestrian crossing on this approach has been considered by TfNSW under previous separate investigations and is considered not achievable due to a number of site constraints. A single pedestrian crossing on this approach based on existing geometry would likely be angled at 60/70 degrees and is unlikely to be supported on road safety grounds.</p>
10	Hathern Street / Tebbutt Street Intersection (Taverners Hill area)	It is considered that operational efficiencies and amenity improvements for pedestrians can be achieved at and near the signalised intersection. Council is encouraged to initiate consultation and collaboration with TfNSW in this regard.

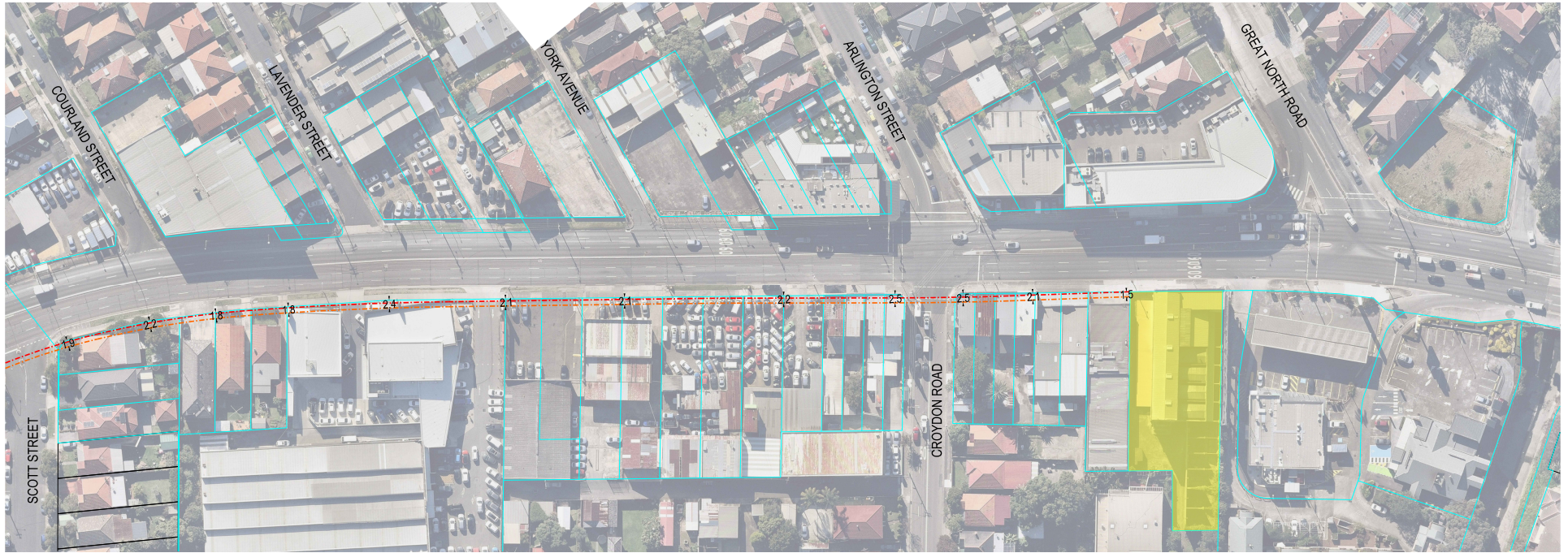
No.	Section/Page ref	Comment/suggestion
11	Cook Street / Old Canterbury Road Intersection (Southern side of Parramatta Road)	<p>The existing intersection arrangement is heavily constrained, currently operating as a priority-controlled intersection. Key conflicting movements from Cook St and Old Canterbury Rd result in extensive queuing onto Parramatta Rd. The congestion and resulting queuing contribute to increased road safety risk, relevant to vehicular and pedestrian transport modes. Under the proposal, there is an expected increase in the pedestrian and vehicles accessing the residential areas in the area.</p> <p>Council is encouraged to initiate consultation and collaboration with TfNSW to identify measures to mitigate the increased risk.</p>
12	General	<p>Sydney Metro supports increased density identified in three precincts and acknowledges that place-making actions align with those identified in the adopted PRCUTS.</p> <p>Sydney Metro welcomes the opportunity to collaborate further with Council to ensure land use outcomes are optimised and capitalises on government's investment in Sydney Metro infrastructure prior to finalising the planning controls.</p>

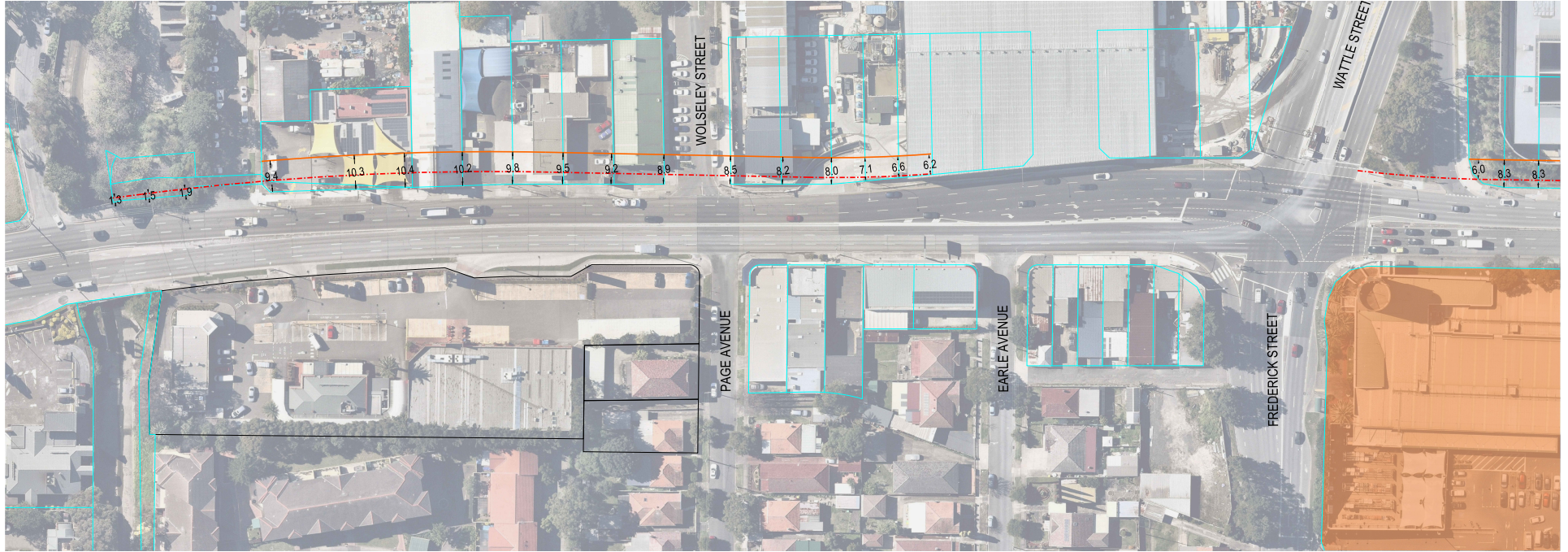
Attachment C – Inner West Council Indicative Draft Road Widening Plans

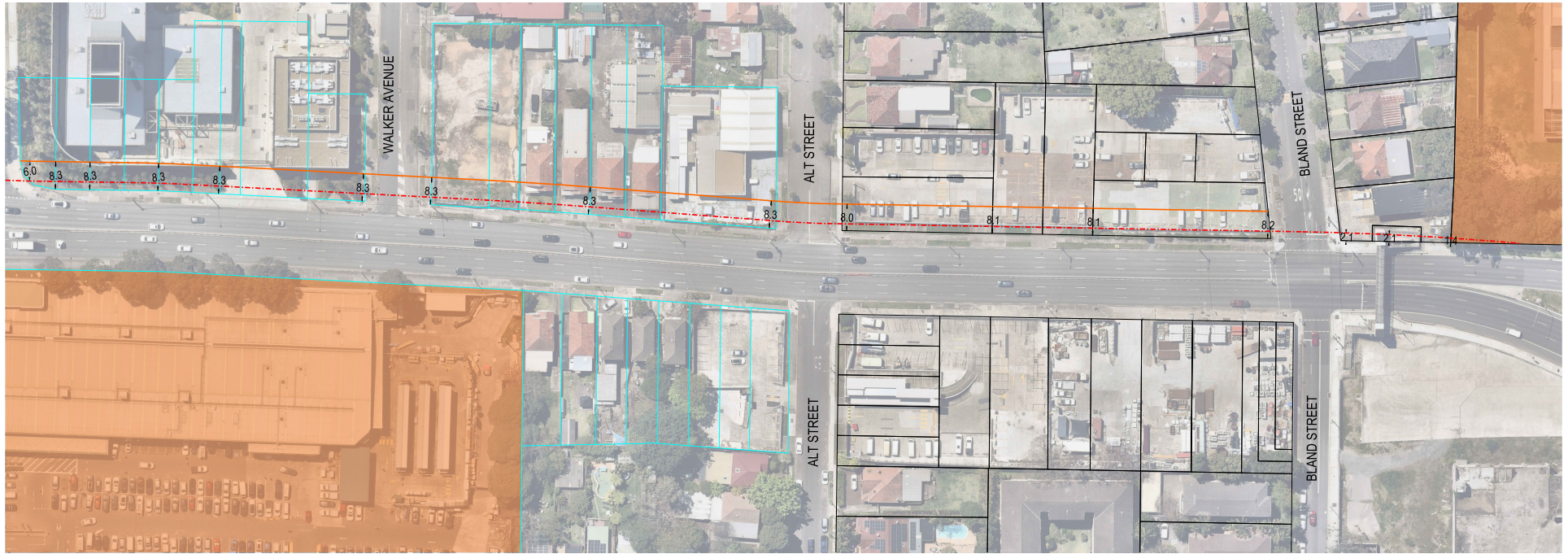
Item 3

Attachment 2



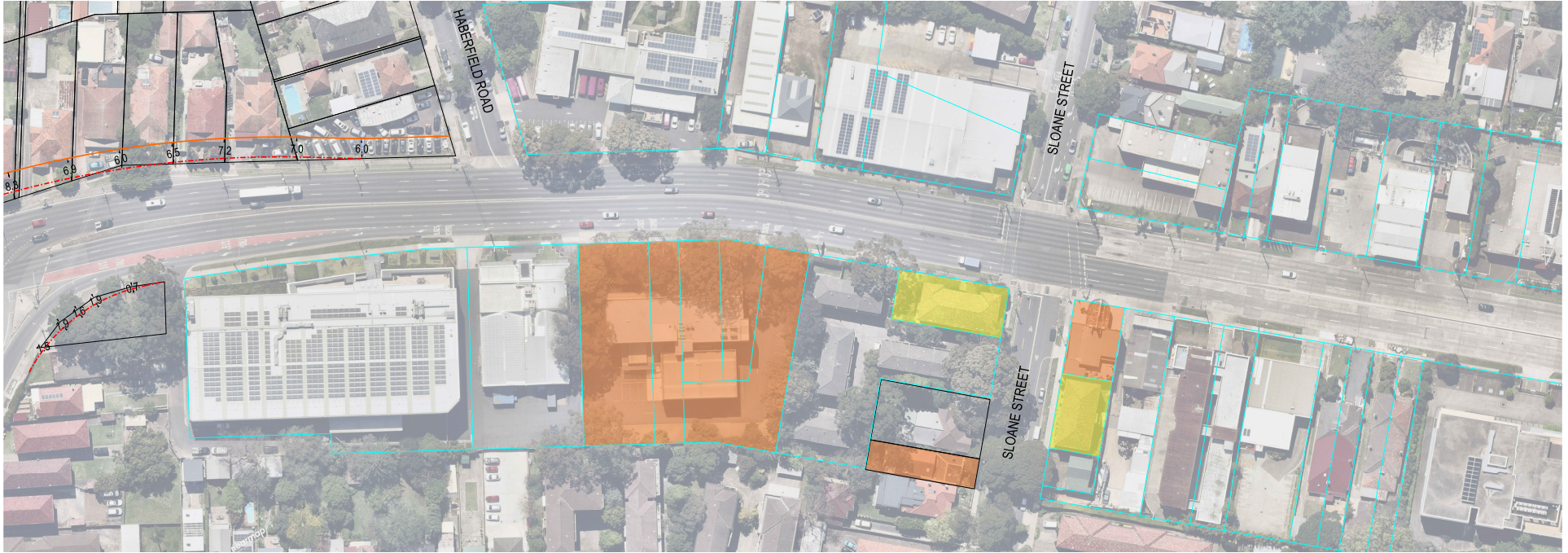


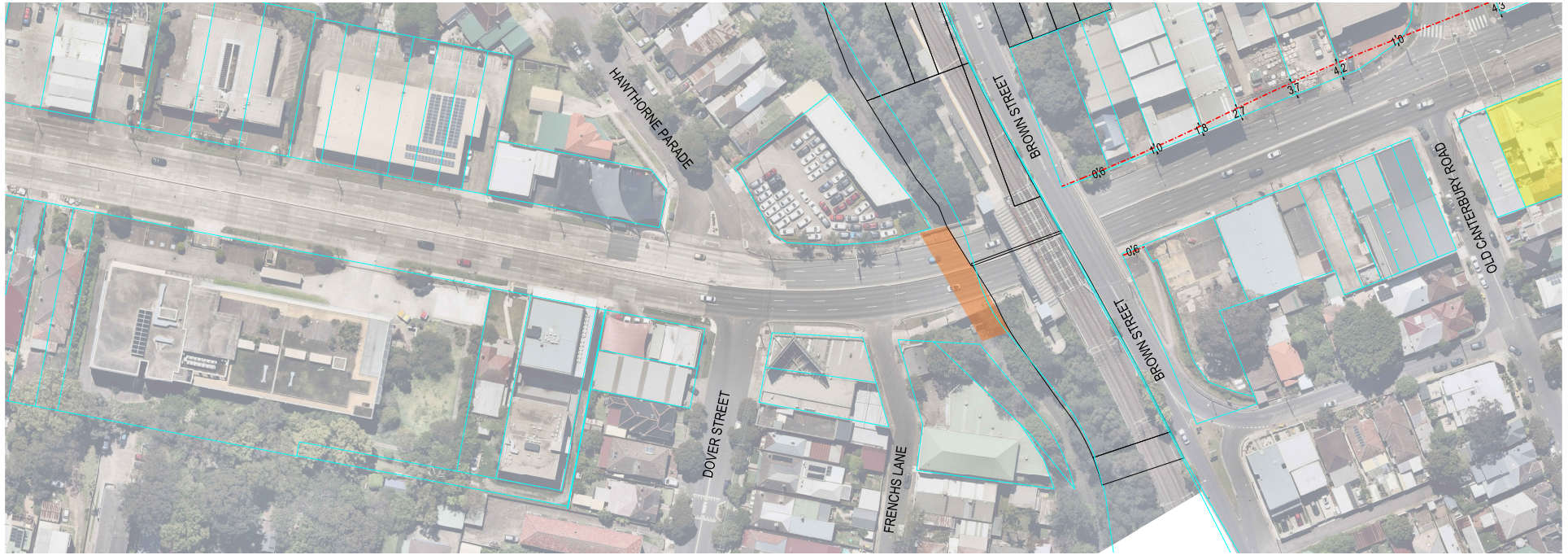




















Our Ref: ID 2184
Your Ref: PP-2022-1921 Ref-2518

11 December 2023

Olive Diaz
Department of Planning and Environment
Locked Bag 5022
Parramatta NSW 2124

email: olive.diaz@innerwest.nsw.gov.au
CC: shelly.stingmore@one.ses.nsw.gov.au

Dear Olive,

**Planning Proposal for Parramatta Road Corridor Stage 1 Planning Proposal - Inner West
LEP Phase 2A**

Thank you for the opportunity to provide comment on the Planning Proposal for Parramatta Road Corridor Stage 1 Planning Proposal - Inner West LEP Phase 2A. It is understood that the planning proposal seeks to implement parts of the Parramatta Road Corridor Urban Transformation Strategy (PRCUTS) for Leichhardt, Taverners Hill and Kings Bay/ Croydon precincts, which is the first step in the staged implementation of PRCUTS.

We understand that the proposal seeks amendments to various planning controls such as rezoning several sites across the three precincts to R3 Medium Density Residential with residential flat buildings being an additional permitted use.¹ We note that amendments to various planning controls include zoning, floor space ratios, maximum building heights etc., with amendments generally resulting in larger building footprints.² It is understood that these changes are intended to increase residential density and housing diversity, and would include lot amalgamation including allowing for basement carparking.³

It is understood that the planning proposal is expected result in an increase of an additional 1516 dwellings, 2919 population and 1944 jobs (and associated vehicles)⁴. These people and vehicles will be exposed to the flood risk in the precincts.

The NSW State Emergency Service (NSW SES) is the agency responsible for dealing with floods, storms and tsunami in NSW. This role includes, planning for, responding to and coordinating the initial recovery from floods. As such, the NSW SES has an interest in the public safety

¹ Appendix 5 – Flood Impact Risk Assessment, Nov 2023, Section 1.2.1, page 6

² Appendix 5 – Flood Impact Risk Assessment, Nov 2023, Section 1.2.2, page 6

³ Planning Proposal: Parramatta Road Corridor Stage 1 Implementation – November 2023, Table 24, page 100; Draft Development Control Plans, Section 14.8.4 Lot amalgamation, page 46

⁴ Planning Proposal: Parramatta Road Corridor Stage 1 Implementation – November 2023, Table 1, page 12



STATE HEADQUARTERS
93 - 99 Burelli Street, Wollongong 2500
PO Box 6126, Wollongong NSW 2500
P (02) 4251 6111
F (02) 4251 6190
www.ses.nsw.gov.au
ABN: 88 712 649 015



aspects of the development of flood prone land, particularly the potential for changes to land use to either exacerbate existing flood risk or create new flood risk for communities in NSW.

The consent authority will need to ensure that the planning proposal is considered against the relevant Ministerial Section 9.1 Directions, including 4.1 – Flooding and is consistent with the NSW Flood Prone Land Policy as set out in the Flood Risk Management Manual 2023 (the Manual) and supporting guidelines, including the Support for Emergency Management Planning. Key considerations relating to emergency management are outlined in Attachment A.

In summary, we:

- **Note** that the Taverners Hill precinct currently becomes isolated by flood waters as frequently as a 50% Annual Exceedance Probability (AEP) event⁵ and impacted by depths in excess of 4 metres during a Probable Maximum Flood (PMF) event⁶. These depths are not safe for people or vehicles and all buildings are considered vulnerable to failure.
- **Note** that the Leichhardt precinct currently becomes impacted by flash flooding⁷ as frequently as a 20% AEP event⁸, particularly at the intersection of Parramatta Road and Balmain Road, and becomes impacted by depths just over 1.5m during a PMF.⁹
- **Note** that part of the Kings Bay precinct near Iron Cove Creek is at risk of high hazard flooding (H5 and H6) from events as frequent as the 10% AEP event¹⁰, and that several areas in the Kings Bay precinct become inundated by flood depths of up to and greater than 2 metres in a PMF.¹¹
- **Note** that the Masterplan Design for Petersham Street incorporates temporary water storage and an area to accommodate an overland flow path.¹² However, **we also note** that the adjacent footpath is shown to be at a lower height than the overland flow path, which may put pedestrians at risk depending on the severity of the flood event.
- **Recommend** carefully considering the locations of proposed increase in density of development and its associated increased risk to life and property.
- **Recommend** that any basement carparking proposed for this precinct ensures that all openings (ramps, vents) are located above the PMF, to prevent water ingress and flooding, and reduce the risk to life.
- **Recommend** that careful consideration is given to design of the precinct to ensure that on-street flooding is not increased in areas where basement car park entries may already exist.

⁵ Hawthorne Canal Flood Study 2015

⁶ Appendix 5 – Flood Impact Risk Assessment, Nov 2023, Section 3.3, page 16

⁷ Appendix 5 – Flood Impact Risk Assessment, Nov 2023, Section 2.4, Table 2-3, page 14

⁸ Leichhardt Flood Study 2010

⁹ Appendix 5 – Flood Impact Risk Assessment, Nov 2023, Section 3.1, page 15

¹⁰ Appendix 5 – Flood Impact Risk Assessment, Nov 2023, Section 3.2, page 16

¹¹ Appendix 5 – Flood Impact Risk Assessment, Nov 2023, Section 3.2, page 16

¹² Parramatta Road UAIP Masterplan, page 20



- **Recommend** investigating ways to increase emergency access and egress during a flood.

You may also find the following Guidelines, originally developed for the Hawkesbury Nepean Valley and available on the NSW SES website useful:

- [Reducing Vulnerability of Buildings to Flood Damage](#)
- [Designing Safer Subdivisions](#)
- [Managing Flood Risk Through Planning Opportunities](#)

Please feel free to contact Claire Flashman via email at rra@ses.nsw.gov.au should you wish to discuss any of the matters raised in this correspondence. The NSW SES would also be interested in receiving future correspondence regarding the outcome of this referral via this email address.

Yours sincerely

Elspeth O'Shannessy
Manager Risk Assessment Emergency Risk Management
NSW State Emergency Service



ATTACHMENT A: Principles Outlined in the Support for Emergency Management Planning Guideline¹³

Principle 1 Any proposed Emergency Management strategy should be compatible with any existing community Emergency Management strategy.

Any proposed Emergency Management strategy for an area should be compatible with the evacuation strategies identified in the Inner West Council Local Flood Plan¹⁴, where evacuation is the primary Emergency Management Strategy.

In the context of future development, self-evacuation of the community should be achievable in a manner which is consistent with the NSW SES's principles for evacuation. Evacuation must not require people to drive or walk through flood water.

Principle 2 Decisions should be informed by understanding the full range of risks to the community.

Decisions relating to future development should be risk-based and ensure Emergency Management risks to the community of the full range of floods are effectively understood and managed.

Taverners Hill – Flood risks, including isolation and high hazard flooding

Several nearby intersections become impacted by flooding during a 50% Annual Exceedance Probability (AEP) flood event, including the intersections at:

- Parramatta Road, West Street and Flood Street (southwest of the site)¹⁵
- Foster Street and Foster Lane (north of the site)¹⁶
- Slightly west of Sloan Street and Parramatta Road (east of the site)

Accordingly, the site becomes isolated in events as frequent as the 50% AEP event. We note SES have previously conducted flood rescues on the flood affected points along Parramatta Road mentioned above.

Beeson Street and the corners of the study area become subject to high hazard (H5) flooding as frequently as a 10% AEP event. In the case of Beeson Street this is due to the high velocity of the floodwater,¹⁷ while in the corners of the study area this is due to flood depths reaching up to 2.3m. Further areas become exposed to H5 hazard in 1% AEP flood events, with the

¹³ NSW Government. 2023. Principles Outlined in the Support for Emergency Management Planning Guideline

¹⁴ Inner West Council Flood Emergency Sub Plan, endorsed December 2021, Volume 1, page 16

¹⁵ Hawthorne Canal Flood Study 2015

¹⁶ Hawthorne Canal Flood Study 2015

¹⁷ Appendix 5 – Flood Impact Risk Assessment, Nov 2023, Section 3.3, pages 16-17



majority of the site classified as H5 in a PMF event with some areas of H6 also noted near the railway embankment, due to flood depths exceeding 4 metres.¹⁸

Leichhardt – Flood risks

The intersection of Parramatta Road and Balmain Road, and several surrounding streets, become flooded in a 20% AEP event.¹⁹ Flood depths at this intersection range from 0.9m in a 10% AEP event to 1.57m in a PMF event.²⁰ During a PMF event, approximately 60% of the site is classified as being impacted by H5 flood hazard,²¹ which is unsafe for people and vehicles, and all buildings exposed to this hazard are vulnerable to structural damage. Some less robust building types exposed to this hazard are vulnerable to failure.

Kings Bay – Flood risks

Part of the Kings Bay precinct near Iron Cove Creek is at risk of high hazard flooding (H5 and H6) in all flood events modelled in the Flood Impact Risk Assessment provided, including during events as frequent as the 10% AEP event.²² We also note that several areas in the Kings Bay precinct become inundated by flood depths of up to and greater than 2 metres in a PMF, including this same area near Iron Cove Creek, as well as West Street, Sunbeam Avenue and Parramatta Road.²³ We also note that flood velocities the Iron Cove Creek area are modelled to be greater than 2m/s in a PMF event, however, that the remainder of the site experiences flood velocities typically below 1.0m/s even in a PMF event.

Principle 3 Development of the floodplain does not impact on the ability of the existing community to safely and effectively respond to a flood.

The ability of the existing community to effectively respond (including self-evacuating) within the available timeframe on available infrastructure is to be maintained. It is not to be impacted on by the cumulative impact of new development.

The increase in density will increase the number of people in the floodplain. It is also noted that onsite carparking for the proposed development is limited,²⁴ and may therefore increase nearby street parking. We recommend taking this into consideration regarding access for emergency vehicles, such as NSW Ambulance vehicles and SES vehicles.

Principle 4 Decisions on redevelopment within the floodplain does not increase risk to life from flooding.

Managing flood risks at the site requires careful consideration of development type, likely users, and their ability respond to minimise their risks. This includes consideration of:

¹⁸ Appendix 5 – Flood Impact Risk Assessment, Nov 2023, Section 3.3, page 16

¹⁹ Leichhardt Flood Study 2010

²⁰ Appendix 5 – Flood Impact Risk Assessment, Nov 2023, Section 3.1, page 15

²¹ Appendix 5 – Flood Impact Risk Assessment, Nov 2023, Section 3.1, page 15

²² Appendix 5 – Flood Impact Risk Assessment, Nov 2023, Section 3.2, page 16

²³ Appendix 5 – Flood Impact Risk Assessment, Nov 2023, Section 3.2, page 16

²⁴ Draft Development Control Plans, Section 14.3.9 Access and parking, pages 11-13



- Isolation – There is no known safe period of isolation in a flood, the longer the period of isolation the greater the risk to occupants who are isolated.
- Secondary risks – This includes fire and medical emergencies that can impact on the safety of people isolated by floodwater. The potential risk to occupants needs to be considered and managed in decision-making.
- Consideration of human behaviour – The behaviour of individuals such as choosing not to remain isolated from their family or social network in a building on a floor above the PMF for an extended flood duration or attempting to return to a building during a flood, needs to be considered.

Principle 5 Risks faced by the itinerant population need to be managed.

The risks to the people visiting the area or using the area need to be considered and managed to reduce the risk to life.

Principle 6 Recognise the need for effective flood warning and associated limitations.

The area is subject to flash flooding, with little to no warning time. Therefore, any site occupants have little time to prepare and take protective actions.

Principle 7 Ongoing community awareness of flooding is critical to assist effective emergency response.

In terms of the current proposal, the flood risk at the site and actions that should be undertaken to reduce the potential risk to life should be clearly communicated to all site users.



Department of Planning and Environment

Our ref: DOC23/1002358
Your ref: PP-2022-1921

Nicola Viselli
Senior Strategic Planner
Inner West Council
PO Box 14, Petersham NSW 2049

14 December 2023

Subject: Revitalising the Parramatta Road Corridor - Stage 1 Planning proposal (PP-2022-1921) - Inner West

Dear Nicola,

Thank you for referring the planning proposal to amend the *Inner West Local Environmental Plan (LEP) 2022* to implement Stage 1 of the Parramatta Road Corridor Urban Transformation Strategy 2016 (PRCUTS – or the ‘Strategy’) in parts of the Precincts of Leichhardt, Taverners Hill and Kings Bay in the Inner West LGA (PP-2022-1921) to the Environment and Heritage Group (EHG) for review and advice.

EHG has reviewed the planning proposal and the following documents:

- Appendix 2A -(A3) Urban Design Review
([https://www.innerwest.nsw.gov.au/ArticleDocuments/33263/Appendix 2A -\(A3\) Urban Design Review](https://www.innerwest.nsw.gov.au/ArticleDocuments/33263/Appendix 2A -(A3) Urban Design Review))
- Attachment 2 - Planning Proposal - Post Gateway
(<https://www.innerwest.nsw.gov.au/ArticleDocuments/33263/Attachment 2 - Planning Proposal - Post Gateway>)
- Appendix 5 - Flood Impact Study Updated 29.11.23
(<https://www.innerwest.nsw.gov.au/ArticleDocuments/33263/Appendix 5 - Flood Impact Study Updated 29.11.23>)
- Appendix 2B - (A3) Inner West Draft Structure Plan 2020
([https://www.innerwest.nsw.gov.au/ArticleDocuments/33263/Appendix 2B - \(A3\) Inner West Draft Structure Plan 2020](https://www.innerwest.nsw.gov.au/ArticleDocuments/33263/Appendix 2B - (A3) Inner West Draft Structure Plan 2020))
- Appendix 2C - (A3) Leichhardt Council's Urban Design Study 2016
([https://www.innerwest.nsw.gov.au/ArticleDocuments/33263/Appendix 2C - \(A3\) Leichhardt Council's Urban Design Study 2016](https://www.innerwest.nsw.gov.au/ArticleDocuments/33263/Appendix 2C - (A3) Leichhardt Council's Urban Design Study 2016))

provides advice on flood assessment and risk management and biodiversity.



Department of Planning and Environment

Flooding

The submitted report (Appendix 5) includes the modelling works for the assessment of flooding characteristics under baseline conditions and post-development scenarios. The modelling results show that the changes in flooding characteristics from baseline conditions to the projected development scenarios of the Stage 1 precincts would be small and, in some cases, would be insignificant. This is due to the assumptions of the modelling processes, which consider that the topography, drainage patterns and imperviousness of these development precincts would be unchanged from baseline conditions to the post-development scenarios.

The Stage 1 precincts are in the flood planning area (FPA) and subject to flood related development controls. The modelling results show that some of these Stage 1 precincts would be subject to high flood risks under baseline conditions and the post-development scenario. The anticipated flooding hazards would be H3 to H6 (such as Taverners Hill), which would pose considerable risks to people and vehicles. Some development sites in these precincts would be isolated and surrounded by floodwater under major and extreme events, such as the PMF Event. This would pose considerable risks to these development sites, which would accommodate additional dwellings and population because of the intensification of development.

Movement of people (residents and workers) under major and extreme events such as the PMF Event may pose significant risks including the risks to life since the floodwater depth would be in the order of 1-2m and even higher at these development sites. This would require the development and implementation of an appropriate risk management and emergency response strategy (or plans) to address and manage flooding impacts to residents and businesses of these development sites.

The level of anticipated risks under major and extreme flooding events have not been considered by in the submitted documents but need to be considered in consultation with the NSW State Emergency Service for the high-risk development sites in the Stage 1 precincts. The flooding duration under major and extreme events at these high-risk development sites would be 30 to 120 minutes. The nature of flooding indicates that it may not be possible to implement risk management strategy (or plans) for the high-risk development sites using active controls such as flood warning products, and retreat and evacuation from the flood impacted sites facilitated by the emergency management agency. The planning proposal should outline risk management and emergency response plans for these high-risk growth pockets using passive controls, which are site-specific and sustainable and would not rely on interventions from the emergency management agency.

The future developments of the Stage 1 precincts would likely have multi-level car parks. Although the planning proposal indicates that the sustainable and active transport strategy would be implemented for these precincts to minimise the use of private cars, the FSR and HOB for some



Department of Planning and Environment

development sites indicate that the proposed buildings would have multi-level underground car parks. The entry levels of basement (or underground) car parks should be determined appropriately to mitigate the potential submergence risks of these car parks. These may include the selection of a defined flood event (DFE) for the entry level of these basement car parks. The flood modelling works should include the design runs for the 0.5% AEP and 0.2% AEP events to determine the DFE(s) for the entry levels of basement car parks.

The modelling works suggest that the assumptions for blocking off the building footprints (i.e., no flow through buildings) were adopted for design runs under baseline conditions and the post-development scenario. The development patterns under baseline conditions indicate that the adopted assumptions may not be accurate and flows under flooding conditions would be possible through single density developments. In addition, the modelling works should be refined by using the preferred development typologies of Stage 1 precincts.

Section 5 and Table 5-1 of Appendix 5 provided an overall assessment of Stage 1 precincts and indicated that these precincts would comply with Ministerial Direction 4.1 – Flooding. The flooding characteristics and flood maps of the submitted report indicate that the risks would vary across the development sites in Stage 1 precincts. Some sites would be subject to significant flooding risks and would require the implementation of appropriate risk management measures by considering the full range of flooding events including the PMF Event. The flooding risk assessment should be granular for the Stage 1 precincts. This should be in alignment with the urban design review reports.

The current gaps of flooding risk assessment for the Stage 1 precincts needs to be addressed in alignment with the urban design reports and the assessment and relevant documents updated.

Biodiversity

EHG notes that Hawthorne Canal is in the subject area. The Canal provides connectivity for biodiversity, which is very significant at a local scale given the urbanised nature of the area. The planning proposal has the potential to indirectly impact this vegetation through overshadowing, increased public access and changes to hydrology. Habitats along the canal are utilised occasionally by threatened fauna species. Therefore, the proposal may adversely affect threatened species through indirect impacts on this vegetation.

There is a roost site of the Large Bent-wing Bat (*Miniopterus orianae oceanensis*) within 50m of the Taverners Hill precinct. The proposal may potentially impact on the flight paths of this threatened species. The planning proposal should assess and address any adverse impacts that may occur as a result of this planning proposal to this threatened species.

Department of Planning and Environment



If you have any queries please contact Liz Peterson via elizabeth.peterson@environment.nsw.gov.au.

Yours sincerely,

S. Harrison

Senior Team Leader
Greater Sydney Branch
Biodiversity and Conservation

Item 3

Attachment 3

Greater Cities Commission

www.greatercities.au

Item 3

GCC Planning Proposal Comments

Proposal:	PLANNING PROPOSAL – Parramatta Road Corridor Stage 1 Implementation (Leichhardt, Taverners Hill, Kings Bay / Croydon)
Recommendation:	GCC generally supports the Inner West Council's Planning Proposal to rezone certain lands in Leichhardt, Taverners Hill and Kings Bay / Croydon within the Parramatta Road Corridor Stage 1, to provide additional 1,516 homes and 1,944 jobs.
Purpose:	Public authority response to the Council-led Planning Proposal exhibition.
Key issues:	<p>Consideration of relevant plans:</p> <p>Greater Sydney Region Plan</p> <p><i>A Metropolis of Three Cities – the Greater Sydney Region Plan</i> is the NSW Government's overarching strategic plan for growth and change in Sydney. The plan sets out four goals: securing 'a city supported by infrastructure' and 'a collaborative city'; achieving 'a city for people' - housing the city and a city of green places; creating 'a well-connected city' - jobs and skills for the city; delivering 'a city in its landscape' - an efficient and resilient city.</p> <p>The Region Plan identifies several objectives that aim to deliver the vision for Greater Sydney and the Eastern City District. The following objectives are relevant to this PP:</p> <ul style="list-style-type: none"> • Objectives 4 – Infrastructure use is optimised • Objectives 7 – Communities are healthy, resilient and socially connected • Objectives 9 – Greater Sydney celebrates the arts and supports creative industries and innovation • Objectives 10 – Greater housing supply • Objectives 11 – Housing is more diverse and affordable • Objectives 12 – Great places that bring that bring people together • Objective 13 – Environmental heritage is identified, conserved and enhanced • Objective 14 – A Metropolis of Three Cities – integrated land use and transport creates walkable and 30-minute cities • Objective 24 – Economic sectors are targeted for success • Objective 25 – The coast and waterways are protected and healthier • Objective 30 – Urban tree canopy cover is increased • Objective 31 – Public open space is accessible, protected and enhanced

OFFICIAL

Level 11, 6PSQ, 10 Darcy Street, Parramatta NSW 2150
PO Box 257, Parramatta NSW 2124

(02) 8289 6200
www.greatercities.au

1

Attachment 3

Greater Cities Commission

www.greatercities.au

Item 3

- Objective 32 – The Green Grid links park, open spaces, bushland and walking and cycling paths
- Objective 33 – A low-carbon city contributes to net-zero emissions by 2050 and mitigates climate change
- Objective 34 – Energy and water flows are captured, used and re-used
- Objective 37 – Exposure to natural and urban hazards is reduced

The Planning Proposal is broadly consistent with the Region Plan.

Eastern City District Plan

Relevant priorities and actions include:

Planning Priority E2: Working through collaboration.

This Council-led planning proposal seeks to implement stage 1 of the Parramatta Road Corridor Urban Transformation Strategy within the Inner West local government area. This strategy was initially developed by Urban Growth NSW in 2016 and reflects a collaboration between councils and state agencies, supported by the Commission. The proposal is consistent with this priority.

Planning Priority E5: Providing housing supply, choice and affordability, with access to jobs, services and public transport.

The Parramatta Road Corridor Urban Transformation Strategy is identified as the current initiatives and opportunities for additional housing capacity and supply in the District. In addition, Leichardt, designated as a local centre and areas along the light rail (including Taverners Hill) are mapped for more housing in the right location, considering the capacity of existing infrastructure and services.

Secondly, the District plan specifies a 5-10% affordable rental housing targets subject to viability test. The proposal is supported by the viability test and the draft affordable rental housing scheme recommends a 2% of residential floorspace or in-kind monetary contributions in the Leichardt precinct. The viability tool developed by the Department of Planning and Environment concludes that affordable housing contributions in Taverners Hill and Kings Bay/Corydon precincts are not viable due to land values in the area and costs of potential amalgamations.

The proposal is therefore consistent with these provisions.

Planning Priority E6 Creating and renewing great places and local centres and respecting the District's heritage.

OFFICIAL

2

Attachment 3

Greater Cities Commission

www.greatercities.au

Item 3

The rezoning proposal is supported by *Leichhardt Urban Design Study (2016)*, *Inner West Structure Plan (2020)* and *Parramatta Road Corridor Urban Design Peer Review by Architectus (2023)* that take into consideration of local character, spatial context that informs the finer grain design guidelines that apply to individual precincts.

A number of the opportunity sites have been assessed to provide incentive planning controls that enable better public domain outcomes, such as provision of open space, landscaped plaza, through site links for pedestrian and cyclists. The proposal includes a proposed local heritage item at Lewisham Hotel that is informed by the heritage study. The proposal is consistent with this priority.

Planning Priority E8: Growing and investing in health and education precincts and the Innovation Corridor.

Whilst the proposal does not yield employment floorspace within the Tech Central Innovation District boundary directly, it boosts the supply of affordable and social housing for key workers and workers in creative industries and start-ups in the area. Therefore, this will address the critical housing need to support the ongoing productivity of the innovation district. The proposal is consistent with this priority.

Planning Priority E10 Delivering integrated land use and transport planning and a 30-minute city.

Parramatta Road corridor is identified for improved city-serving and centre-serving transport links under the District Plan. Public transport improvements, including provision of frequent, reliable and efficient mass transit transport solution, along this corridor will leverage off the land use and place opportunities above ground of the WestConnex tunnel project.

The proposed Five Dock Metro station is also located approximately 800m from the Kings Bay / Croydon precinct. Taverns Hill precinct is well serviced by existing Taverners Hill light rail station and Lewisham heavy rail station

This proposal will yield additional homes and jobs opportunities that are integrated with and optimise the existing and planned infrastructure. It will further drive the demand and future Government investment of the public transport improvement along Parramatta Road. The proposal is consistent with this priority.

Planning Priority E12 Retaining and managing industrial and urban services land.

Although the District Plan suggests that the retain and management of industrial and urban services land approach does not apply to the Parramatta

OFFICIAL

3

Attachment 3

Greater Cities Commission

www.greatercities.au

Item 3

Road Corridor area. This planning proposal currently excludes existing industrial lands in the Parramatta Road Corridor. The proposal includes retention of E3 Productivity Support zone with supporting DCP amendments to ensure that the urban services zoned land continues to generate employment uses on ground floor, such as showroom, light urban services uses. The proposal is consistent with this priority.

Planning Priority E17 Increasing urban tree canopy cover and delivering Green Grid connections.

The Taverners Hill precinct is located in close proximity to the priority green grid corridor the Iron Cove Greenway and the Hawthorne Canal. The proposal includes provision of new open space, new through-site links that allows for new and improvement of walking and cycling infrastructure, enhancing the quality and connectivity to this priority corridor.

The proposal adopts the tree canopy and deep soil targets from NSW Government Architect's Green Neighbourhoods Guide for R3 Medium Density Residential and E3 Productivity Support zones. The draft DCP controls also seek to maximise retention of existing mature trees.

Planning Priority E19 Reducing carbon emissions and managing energy, water and waste efficiently.

This planning proposal introduces higher environmental and sustainability standards, above the minimum energy and water requirements under the Sustainable Buildings SEPP, applicable for opportunity sites to access FSR and HOB planning incentives. The proposed more stringent standards include separate requirements for residential and non-residential components in a development proposal. These controls are informed by a precinct-wide sustainability study and the review of best practice by neighbouring councils.

Planning Priority E20 Adapting to the impacts of urban and natural hazards and climate change.

The planning proposal is informed by the flood risk impact assessment, to address the gateway determination condition. As a result, the proposal has removed a number of sites in the affected Kings Bay / Croydon precinct, with a corresponding reduction of 99 dwellings in this precinct as compared to the original proposal. Setback controls are also adjusted for the site 45-53 Old Canterbury Road, Lewisham in the Taverners Hill precinct.

Conclusion:

GCC supports the council-led Planning Proposal to rezone the Parramatta Road Corridor stage 1 implementation area within the Inner West Council LGA.

OFFICIAL

4

Attachment 3

Greater Cities Commission

www.greatercities.au

Item 3

The Planning Proposal will deliver 1,516 homes and 1,944 jobs and is broadly consistent with the Region Plan, District Plan and Parramatta Road Corridor Urban Transformation Strategy.

Attachments: 1. Nil

OFFICIAL

5

Attachment 3



Department of Planning and Environment

Our ref: DOC23/970182

Olive Diaz
Strategic Planner
Inner West Council
PO Box 14,
Petersham NSW 2049

Attention: Olive Diaz, Council@innerwest.nsw.gov.au

Planning proposal (Department Ref: PP-2022-1921): to amend the Inner West Local Environmental Plan 2022 to implement Stage 1 of the Parramatta Road Corridor Urban Transformation Strategy 2016 (PRCUTS) in parts of the PRCUTS Precincts of Leichhardt, Taverners Hill and Kings Bay

Dear Ms Diaz

Thank you for the opportunity to comment on the abovementioned proposal.

HNSW has reviewed the documentation and confirmed that there are no items of State Heritage Significance within the PRCUTS Precincts of Leichhardt, Taverners Hill and Kings Bay.

HNSW encourage amendments to environmental planning instruments in response to the changing needs to an area, provided that greater heritage protection is a desired future outcome and all necessary due diligence, assessments and notifications have been undertaken. Prior to finalisation of the planning proposal, Council should be satisfied that this is the case.

If you have any questions please contact Louise Doherty, Senior Assessment Officer, at Heritage NSW on (02) 9873 8500 or heritagemailbox@environment.nsw.gov.au.

Yours sincerely

Rajeev Maini
Manager – Assessments
As delegate of the Heritage Council of NSW

5 December 2023

4PSQ, 12 Darcy Street, Parramatta NSW, 2150
Locked Bag 5020, Parramatta 2124

(02) 9873 8500

www.environment.nsw.gov.au/topics/heritage



Land and Housing Corporation Submission | December 2023

Our ref: D23/3100299

Strategic Planning Team

Inner West Council

Via Planning Portal

Attention: Strategic Planning

14 December 2023

Subject: Draft Parramatta Road Planning Proposal and supporting Development Control Plans (DCPs)

Dear Ms. Olive Diaz,

Thank you for the opportunity to provide feedback on the *Draft Parramatta Road Planning Proposal* (draft Planning Proposal) and supporting DCPs. Land and Housing Corporation (LAHC) welcomes the opportunity to review and provide suggestions. The draft Planning Proposal covers specific locations in Leichhardt, Taverners Hill and Kings Bay/Croydon precincts. As LAHC does not own properties in the Kings Bay/Croydon and Leichhardt Precincts, this submission will focus on the delivery of social and affordable housing in the Taverners Hill Precinct.

LAHC generally supports the draft Planning Proposal as it meets Council and LAHC's aspirations to increase the supply of social and affordable housing in precincts with existing transport infrastructure and amenities. The following sections discuss potential issues and suggested amendments in relation to proposed land use, floor space ratio (FSR), height of building (HOB) controls and draft affordable housing contribution scheme.

Proposed land use

Land use: Amend land use zones for specific locations in Taverners Hill precinct as from R1 General Residential, R2 Low Density Residential and R4 High Density Residential to R3 Medium Density Residential.

Additional Permitted uses: Introduce a new local provision to permit residential flat buildings as an Additional Permitted Use in all land proposed to be zoned R3 Medium Density Residential in Leichhardt, Taverners Hill and Kings Bay/ Croydon precincts.

Comments: LAHC owns approximately 24 dwellings within the existing R1 General Residential Zone in the Taverners Hill Precinct (north of Parramatta Road). LAHC does not support the proposed rezoning to R3 Medium Density Residential for the following reasons:

- Rezoning to R3 Medium Density Residential limits residential land uses instead of expanding them. Residential flat buildings is a permissible use under the existing R1 General Residential zone; however, it is not permitted under the proposed R3 Medium Density Residential zone.
- Permitting residential flat buildings through a Schedule 1 additional permitted use mechanism is not consistent with the instruction provided in *LEP Practice Note – PN 11-001*. The Practice Note states that 'Wherever possible, land uses should be governed by the Land

Land and Housing Corporation Submission | October 2023 | Attachment A

Use Table and Schedule 1 should only be used where council has demonstrated why this cannot be achieved'. As both R1 General Residential and R4 High Density Residential zones permit residential flat buildings with consent under the Inner West LEP 2022, it can not be demonstrated that there is a need to use the additional permitted uses mechanism.

- NSW Department of Planning and Environment's *Gateway Determination Report* recommended that the Planning Proposal be updated to contemplate the suitability of an R1 and/or R4 zone (as appropriate) to avoid the need to rely upon an additional permitted use approach. LAHC agrees with this recommendation and asks Council to reconsider the proposed rezoning. Council's additional justification of proposed amendments states that 'the R3 zoning will allow for the delivery of a diversity of housing types consistent with the objectives of the zone...'. This justification needs further consideration as the existing R1 zoning already allows for the delivery of a diversity of housing types. If the intention is to deliver additional dwellings close to public transport, then R4 High Density Residential zone should be considered.

Suggested amendments:

- Consider rezoning the identified area to R4 High Density Residential or add residential flat buildings to R3 Medium Density Residential as a permitted with consent use.

Proposed FSR and HOB incentives

Proposed incentives: Retain existing FSR and HOB controls and introduce additional HOB and FSR controls where uplift is proposed (incentive FSR and incentive HOB). Summary of existing and proposed controls relevant to the LAHC owned properties is provided in the below table.

Table 1: Taverners Hill Precinct existing and proposed controls

Area	Current zone	Proposed zone	Current FSR	Proposed incentive FSR	Current HOB	Proposed incentive HOB
Block bounded by Kegworth, Tebbutt and Beeson Streets (North of Parramatta Road)	R1	R3 (+RFB)	0.5	0.9	Not defined	12m

Comments: LAHC supports the FSR and HOB incentives in principle; however would suggest Council consider making them more consistent across different locations. The block adjacent to where LAHC properties are located (bounded by Beeson, Tebbutt and Hethern Streets) has a proposed incentive FSR of 1.2:1 and proposed incentive HOB of 15.5m. As these two blocks are both within 400m to Taverners Hill Light Rail Station and separated by only one street (Beeson Street), they should enjoy the same incentive FSR and incentive height. In addition, the draft DCP proposed different maximum storeys for these two blocks (3-storey for block bounded by Kegworth, Tebbutt and Beeson Streets and 4-storey for block bounded by Beeson, Tebbutt and Hathern Street).

Suggested amendments:

Land and Housing Corporation Submission | October 2023 | Attachment A

- Consider amending the incentive FSR for the area bounded by Kegworth, Tebbutt and Beeson Streets to 1.2:1 and incentive HOB to 15.5m.
- Consider removing the maximum storeys controls from the draft DCP as the LEP already imposes a HOB control and ADG stipulate minimum ceiling heights.

Draft Affordable Housing Contribution Scheme

Leichhardt Precinct: The Affordable Housing Contribution Scheme (the Scheme) to be applied to the Leichhardt Precinct only, as viability testing concluded that a Scheme for the Kings Bay/Croydon and Taverners Hill precincts would not be viable at this point in time.

Comments: LAHC supports the proposed Scheme (2% of the residential strata area of the development be provided as an affordable housing contribution), as it aligns with LAHC's aspirations. LAHC would welcome the opportunity to work with Council on any future social and affordable projects, particularly in developing and implementing an affordable housing contribution scheme.

We welcome your consideration of our submission. Should you require any further information or wish to discuss, please contact Ambrose Marquart on 0410 711 904 or by email at Ambrose.Marquart@fac.s.nsw.gov.au.

Yours sincerely,

Ambrose Marquart

18.12.2023

Ambrose Marquart

Manager Strategic Portfolio Planning

Portfolio Services

NSW Land and Housing Corporation



BR23/8719

Nicola Viselli
Senior Strategic Planner
Inner West Council
nicola.viselli@innerwest.nsw.gov.au

SLHD Response to the Inner West Council proposed changes to planning controls in the Parramatta Road Corridor.

Dear Ms Viselli,

I write in response to a call for submissions relating to the proposed changes to planning controls in the Parramatta Road Corridor. The three sites located within Leichardt, Taverners Hill and Kings Bay Croydon are situated within Sydney Local Health District and are an important part of our local community.

The District is generally supportive of the proposed changes to the planning controls across the three sites, however the planning for transport along Parramatta Road is integral to development plans along the Parramatta Road corridor. Upgrades to transport along Parramatta Road are required to be able to facilitate the increased density and population along an already constricted arterial road.

The draft proposal is comprehensive and supports many aspects of the NSW Healthy Built Environment framework including, open spaces, access to sunlight, urban canopies, gas free units, use of solar and cross ventilation.

As the largest employer within the area, the District is supportive of an increase in the provision of affordable housing. It is suggested increasing the proportion of affordable housing within the tenure mix to 30% of the total proposed housing, to be provided in perpetuity. The inclusion of a 5% social housing target is also recommended. This would ensure the provision of housing for vulnerable communities and support long term affordable housing for our key workers.

The rezoning proposals within the Inner West Council area also require review in the context of the rezoning and development plans of neighbouring councils along Parramatta Road. These developments will also contribute to an increase in the population living within the Sydney Local Health District catchment who will require access to health care services. Sydney Local Health District will need to consider spaces for health care services as the total District population grows along the corridor of Parramatta Road including consideration of a healthcare/wellness hub within the developments.

Further commentary related to the rezoning proposal is provided in Appendix One, attached.

PO Box M30
Missenden Road, NSW, 2050
Email slhd-esu@health.nsw.gov.au
www.slhd.nsw.gov.au

Sydney Local Health District
ABN 17 520 269 052
Level 11 North, King George V Building
83 Missenden Rd
CAMPERDOWN, NSW, 2050
Tel 612 9515 9600 Fax 612 9515 9610



Health
Sydney
Local Health District

Thank you for the opportunity to comment on the Inner West Parramatta Road rezoning proposal, and we welcome future opportunities to be included in the review of rezoning development proposals.

Should you require any further information, please contact Dr Pamela Garrett, Director of Planning on 9515 9517.

Yours sincerely

Dr Teresa Anderson AM

Chief Executive

Date 20.12.23

PO Box M30
Missenden Road, NSW, 2050
Email slhd-esu@health.nsw.gov.au
www.slhd.nsw.gov.au

Sydney Local Health District
ABN 17 520 269 052
Level 11 North, King George V Building
83 Missenden Rd
CAMPERDOWN, NSW, 2050
Tel 612 9515 9600 Fax 612 9515 9610



Health
Sydney
Local Health District

Appendix One

Tenure Mix

- The District suggests an increase to the affordable housing targets from 2% proposed only for the Leichardt precinct to 30% across all of the proposed precincts and should remain affordable in perpetuity. As the major employer within the area, across a spectrum of jobs, the District values its key workers being able to access affordable housing, supporting staff to live closer to their places of work for an extended period of time.
- A lack of social housing for vulnerable communities is a major issue within Sydney Local Health District. The District suggests the addition of a 5% social housing target within the proposal to support highly vulnerable communities and priority populations for whom housing is difficult. It will also support the easing of long waiting lists for social housing in the area.
- The District also suggests an increase in larger style units (3 bedroom or more) to support the need for families and multigenerational living within units across Sydney. [Families fear they'll be left out of Sydney's high-density future unless there's a shift toward building bigger apartments - ABC News](#)

Health Care Access

- The rezoning proposal will support an increased number of people living within Sydney Local Health District, who will require access to health care. It is suggested that development proposals should plan for health and primary care facilities within shared community and health spaces.
- With the total number of proposals based upon the PRCUTS precincts along the Parramatta Road corridor impacting access to local Health Care. By 2036 the increase in population will require a small healthcare/wellness Hub that includes primary health care services. It is important that health services are planned for within areas that support public transport and ease of access for clients and health care providers.

Traffic and transport

- The District is concerned about the impact of increased traffic along Parramatta Road. The plan for Parramatta road is integral to the Districts support for this proposal. As Parramatta Road is the main arterial road to access RPA, increased traffic impacts staff accessing their place of work and the public accessing health care services.
- The District strongly supports a Metro stop to be placed at Lansdowne Street to provide increased transport options along Parramatta Road to the City and Parramatta City Centre.
- The District is supportive of the lower parking targets within the proposal and the unbundling of parking from residential lots, as this improves affordability and flexibility for residents. The net increase of parking spaces is unclear across the three proposed sites. Further information is required to determine the implications that increased parking and vehicle usage will have on traffic congestion, traffic noise pollution, road trauma, air toxins and emissions. In many other global city centres, a new residential development within close proximity to rail stations would have little or no off-street parking, except for car share, disabled parking, service vehicles etc.

Implications for Healthy Living

- The District is supportive of the level of detail provided within the Design Guide. The design of gas free units and cross ventilation to improve thermal comfort and support better indoor air quality is supported.
- The planning for green spaces, building heights, density and setbacks are also supported.
- However the following amendments to further support healthy living are suggested:
 - Reverse cycle air conditioning be placed in all units to lower space heating/cooling costs.

PO Box M30
Missenden Road, NSW, 2050
Email slhd-esu@health.nsw.gov.au
www.slhd.nsw.gov.au

Sydney Local Health District
ABN 17 520 269 052
Level 11 North, King George V Building
83 Missenden Rd
CAMPERDOWN, NSW, 2050
Tel 612 9515 9600 Fax 612 9515 9610



Health
Sydney
Local Health District

- Mitigation strategies be used in building design to remove the implications of increasing density along large roads that expose residents to noise and air pollution. The District suggests that the sides of the buildings facing Paramatta Road be designated as non-residential to reduce exposure to noise and air pollution.
- Consider access to outdoor spaces by providing balcony/deck areas. These spaces reduce the risk of airborne disease transmission and foster a sense of community.
- The greening of roof spaces is strongly supported, however requires careful planning. Green roofs, may allow pooling of water, attracting mosquitoes and subsequent disease if not carefully designed.

Implications for the Biotech Hub

The development proposal within the local precinct lies close to Tech Central. The establishment of the Biotech Hub on the West Connex Dive site will support employment in education, health and innovation along the Parramatta Road Corridor.

PO Box M30
Missenden Road, NSW, 2050
Email slhd-esu@health.nsw.gov.au
www.slhd.nsw.qov.au

Sydney Local Health District
ABN 17 520 269 052
Level 11 North, King George V Building
83 Missenden Rd
CAMPERDOWN, NSW, 2050
Tel 612 9515 9600 Fax 612 9515 9610

SYD

Item 3

To:
Olive Diaz
Strategic Planner
INNER WEST COUNCIL

Tuesday, 7 November 2023

Request for advice on SEARs –

**PP-2022-1921 - PARRAMATTA ROAD CORRIDOR STAGE 1 PLANNING PROPOSAL
- INNER WEST LEP PHASE 2A**

Sydney Airport has received a request to comment on PP-2022-1921 - PARRAMATTA ROAD CORRIDOR STAGE 1 PLANNING PROPOSAL - INNER WEST LEP PHASE 2A.

Sydney Airport wishes to make the following comments:

Sydney Airport's Obstacle Limitation Surface(OLS) over the areas in question ranges in height from 80m – 156m above Australian Height Datum (AHD).

Accordingly, any proposed buildings that would penetrate the OLS would constitute a controlled activity under section 182 of the Airports Act 1996. Section 183 of the Act requires that controlled activities cannot be carried out without approval of the Secretary of The Department of Infrastructure, Transport, Regional Development, Communications and the Arts.

Construction cranes may be required to operate at a height significantly higher than that of the proposed development and consequently, may not be approved under the Airports (Protection of Airspace) Regulations.

Sydney Airport advises that approval to operate construction equipment (ie cranes) should be obtained prior to any commitment to construct.

Sincerely,



Peter Bleasdale
Manager, Airfield Spatial & Technical Planning

Sydney Airport

Sydney Airport Corporation Limited ACN 082 578 809 — The Nigel Love Building, 10 Arrivals Court, Locked Bag 5000
Sydney International Airport NSW 2020 Australia — Telephone +61 2 9667 9111 — sydneyairport.com.au

SYD Classification: Confidential

Attachment 3

Transport for NSW



Olive Diaz
Inner West Council
olive.diaz@innerwest.nsw.gov.au

14 December 2023

**Planning Proposal – Parramatta Road Corridor Stage 1 Implementation
PP-2022-1921**

Dear Sir/Madam,

Reference is made to Council's referral via the NSW Planning Portal on 6 November 2023 seeking comments from TfNSW (Sydney Trains) for the above-mentioned Planning Proposal.

TfNSW (Sydney Trains) has reviewed the submitted documentation and notes the following:

- The Planning Proposal seeks to amend the *Inner West Local Environmental Plan 2022* (IWLEP) to implement Stage 1 of the Parramatta Road Corridor Urban Transformation Strategy 2016 (PRCUTS) in the Precincts of Leichhardt, Taverners Hill and Kings Bay.
- The Planning Proposal will also introduce supporting site-specific Development Control Plan (DCP) amendments.

TfNSW (Sydney Trains) is particularly interested in the Taverners Hill Precinct due to the presence of the heavy rail corridor, rail assets and Lewisham Railway Station.

TfNSW (Sydney Trains) has reviewed the submitted documentation in relation to this planning proposal and provides comments for consideration under **Attachment A**.

Transport for NSW (Sydney Trains) appreciates the opportunity to comment on the subject Planning Proposal. Should you have any queries relating to this matter please contact TfNSW (Sydney Trains) Town Planning Management via email to DA_sydneytrains@transport.nsw.gov.au.

Sincerely,

Maddison Pooley
A/Town Planning Manager
Transport for NSW

Transport for NSW



ATTACHMENT A

Sydney Trains Comments - Taverners Hill Precinct

- The proposed zoning, FSR and height amendments are located in close proximity to Sydney Trains' heavy rail corridor, Lewisham Railway Station and land owned by Transport Asset Holding Entity (TAHE). Whilst supported in principle, the amendments will require future Applicants/Developers to approach Sydney Trains early in the design process (as part of pre-DA discussions) to ensure that all relevant Sydney Trains matters of consideration are taken into account and are incorporated into the future design of developments. These considerations include relevant requirements and standards within *State Environment Planning Policy (Transport and Infrastructure) 2021*, the *Department of Planning and Environment's 'Development Near Rail Corridors and Busy Roads – Interim Guidelines'*, TfNSW Asset Management Branch standards, etc.
- Any changes in the LEP to accommodate the density changes or rezoning should take into account setbacks from Transport Asset Holding Entity (TAHE) land and the operational rail corridor.
- Sydney Trains has High Voltage Aerial Transmission Lines in the area which should be accounted for. These assets may, upon further investigation, impact on the overall desired building envelope and development potential of key sites identified within the precinct – as certain setback distances will need to be adhered to, in order to maintain safety and manage risks during construction and once development is completed. Council should also consider the collection of developer contributions where risk mitigation is required to enable the undergrounding of the overhead powerlines, and possibly have this work done prior to future development applications being lodged.
- The desired outcomes of the Planning Proposal will result in a significant increase in dwelling numbers, population growth, and added economic, social and employment activities in and around Lewisham Railway Station. This is expected to add significant pressure on existing Sydney Trains operations and add risks associated with the maintenance and protection of rail infrastructure facilities, due to increased development in close proximity to the heavy rail corridor.
- Sydney Trains advises that early planning decisions must be made in relation to significant developments located near rail corridors and railway stations.
- Taverners Hill Precinct is located in close proximity to Lewisham Railway Station. In this regard, Sydney Trains is to be consulted in regard to any future proposed works in the public domain that connect to or have an interface with the railway station.
- This review does not constitute an assessment of the existing station capacity and train services. Council is required to engage with the relevant section of TfNSW to ascertain any station upgrade and/or increased rail service requirements brought about by the subject Planning Proposal.
- It is requested that Council liaise with TfNSW Land and Maritime Planning (LaMP) in the future stages of the strategic planning process of this proposal. TfNSW LaMP has the delegation to act on behalf of TAHE, the land owner of rail land.

General comments:

Finally, Council is advised that at this stage our comments are based on the high-level nature of the information provided, and should not be taken as approval for any specific initiative or option proposed. We reserve the right to amend and/or provide further responses as additional information and details become available.

22 December 2023

Our Ref: 211046

Inner West Council
PO Box 14, Petersham NSW 2049
council@innerwest.nsw.gov.au

RE: Planning Proposal - Parramatta Road Corridor Stage 1 – PP-2022-1921

Thank you for notifying Sydney Water of the planning proposal PP-2022-1921 which proposes 1,519 and 1,944 additional dwellings and jobs respectively, over 3 precincts. We have reviewed the application based on the information supplied and provide the following comments for your information to assist in planning the servicing needs of the proposed development.

Growth Data

For Sydney Water to continue planning for prudent water and wastewater related infrastructure in this area, we require an update of ultimate and annual dwelling and job forecast from this proposal to ensure our staging of services occurs concomitantly. Sydney Water acknowledges that timescales and final growth numbers may alter however, to provide robust servicing advice and to investigate the potential for staged servicing to meet timescales, we require a realistic indication of demand and timescales. Failure to provide this may result in Sydney Water being unable to formulate proper planning requirements.

We understand that this Planning Proposal is Council-led and will go to the DPE as the consent authority. The Department of Planning and Environment will be requested to provide Sydney Water with an updated ultimate and annual dwelling and job forecast for this Planning Proposal. Council should liaise with the EPULF team to coordinate via the council workbook.

Sydney Water provides Inner West Council with information below to assist with the Parramatta Road Corridor Stage 1.

	<u>Leichardt</u>	<u>Taverners Hill</u>	<u>Kings Bay/Croydon</u>
Job numbers	1378	Nil	566
Dwelling numbers	707	393	416
Servicing			
Water	Should have sufficient capacity Staging intel required to assess timescales fully.	Does not have capacity. Growth Data is required to understand how many dwellings will be delivered in which FY. Sydney Water will take this information into consideration when reviewing the potential network staging upgrades.	Should have sufficient capacity Staging intel required to assess timescales fully.
Wastewater	Should have sufficient capacity Staging intel required to assess timescales fully.	Should have sufficient capacity Staging intel required to assess timescales fully.	Should have sufficient capacity Staging intel required to assess timescales fully.
Stormwater	Taverners Hill precinct - Sydney Water's major stormwater channel known as Petersham Park Branch of Hawthorne Canal is located within the Taverners Hill precinct.		

	Any development that occurs within this precinct must comply with the Building over or adjacent to our stormwater assets .
Recycled water	<ul style="list-style-type: none"> While there is no existing Sydney Water recycled water supply to these precincts, Sydney Water is open to working in partnership with developers to consider recycled water servicing solutions that may offset potable water demands. Consideration should be given for rainwater capture and stormwater runoff reduction. The proponent is advised to contact their Sydney Water Account Manager to investigate the potential for a commercial arrangement to supply recycled water to the development.
General comments	The Leichardt, Taverners Hill, Kings Bay and Croydon precincts are located in established areas. Many assets located within these areas are 100+ years old and will require protection, possible relocation or amplification, especially the critical assets located within Parramatta Road. As such early collaboration between Council, Sydney Water and any proponents will be critical.
	For any future developments referred to Sydney Water within these locations, the developer will be required to provide development's staging, along with forecasted demands including average day and maximum day. As there may be complex amplifications or re-location of assets it is recommended that discussions start early. The water and wastewater servicing for each specific development will be confirmed at the Section 73 application process.
Statutory referrals	All future stages of development in these areas should be lodged via the NSW Concurrence and Referral portal to ensure adequate review and collaboration.

Sydney Water strongly recommends that larger developers reach out to Sydney Water as soon as possible and lodge a feasibility via a Water Servicing Coordinator. Especially for those developments that fall within the Taverners Hill precinct.

Collaboration

Sydney Water advises that the Inner West Council liaises with Sydney Waters Council account manager, Noor Altahir via noor.altahir@sydneywater.com.au. Reaching out to Noor at the early stages will provide an opportunity to coordinate potential infrastructure upgrades between Sydney Water and other utilities. In addition to minimising any disruption of potential road closures due to upgrading Sydney Waters infrastructure.

The development servicing advice provided is not formal approval of our servicing requirements and is based on the best available information at the time of referral (e.g. planning proposal). It is important to note that this information can evolve over time in tandem with the progression of other development projects in the catchment, changes within the local systems and receiving works. This is particularly important in systems with limited capacity. Furthermore, Sydney Water does not reserve or hold capacity for proposed developments, regardless of whether the area has been rezoned or not. To ensure accuracy and alignment with current conditions, it is best to approach Sydney Water for an updated capacity assessment particularly if an approval letter is more than 12 months old.

If you require any further information, please contact the Growth Planning Team via urbangrowth@sydneywater.com.au

Yours sincerely,



Kristine Leitch

Commercial Growth Manager City Growth and Development, Business Development Group
Sydney Water, 1 Smith Street, Parramatta NSW 2150

PP Online (PP-2022-1921)

Referral for Jemena

Reference number: Ref-2525

Decision provided

✓ Assessment

✓ Decision

Proposal case details

Referral case details

Documents

Action summary

Following a preliminary review, is the detail provided complete and is the case ready for a decision?

Yes, the application is ready for decision

What is the outcome of your review?

Decision not required

Comments

Jemena has no objection to this planning proposal-it is noted that the nature of the works will not impact Jemena's assets.

Documents

PP Online (PP-2022-1921)
Referral for Sydney Metro
Reference number: Ref-2520
Decision provided

✓ Assessment

✓ Decision

Proposal case details
Referral case details
Documents
Action summary

Following a preliminary review, is the detail provided complete and is the case ready for a decision?

Yes, the application is ready for decision

What is the outcome of your review?

Advice

Comments

- The Kings Bay Precinct is within 800 metres of the planned Five Dock metro station.
- Sydney Metro supports increased density identified in this precinct and acknowledges that place-making actions align with those identified in the adopted Parramatta Road Corridor Urban Transformation Strategy.
- Sydney Metro would welcome further collaboration prior to finalising the planning controls to ensure that land use outcomes are optimised and capitalises on government's investment in Sydney Metro infrastructure.

Documents



Education

25 January 2024

General Manager
Inner West Council
PO Box 14
Petersham NSW 2049

Attn: Gunika Singh, Gunika.Singh@innerwest.nsw.gov.au

Dear Ms Singh,

RE: SINSW ADVICE - INNER WEST LEP PHASE 2A – PP-2022-1921

School Infrastructure New South Wales (SINSW), as part of the Department of Education (DoE), welcome Inner West Council's (Council's) invitation to provide comment on the Parramatta Road Corridor Stage 1 Implementation Planning Proposal (the draft Proposal).

SINSW understand that the proposal seeks to implement parts of the Parramatta Road Corridor Urban Transformation Strategy (PRCUTS or "the Strategy") for Leichardt, Taverners Hill and Kings Bay/Croydon and will result in approximately 1,700 new dwellings. SINSW has provided detailed commentary in the attachment below.

SINSW welcome the opportunity to engage further on the planning proposal and the content contained in the submission. Should you require further information about this submission, please contact the SINSW Strategic Planning Team at StrategicPlanning@det.nsw.edu.au

Yours Sincerely,

Sezen Furmage

Sezen Furmage
Acting Executive Director, Infrastructure Planning
School Infrastructure New South Wales



School Infrastructure NSW
Level 8, 259 George Street Name Suburb NSW 2000

GPO Box 33, Sydney, NSW 2001



Education

ATTACHMENT – INNER WEST LEP PHASE 2A – PP-2022-1921

Demand for Educational Facilities

DoE have several existing schools within the three (3) nominated Precincts, these being: Leichardt Public School, Sydney Secondary Leichardt Campus, Taverners Hill Infants, Croydon Park Public and Croydon Park and more within surrounding areas. SINSW note that there is long term primary and secondary school demand distributed widely across the schools noted above.

A key consideration for SINSW relates to the proposed changes in dwelling yield from the Parramatta Road Corridor Urban Transformation Planning and Design Guidelines document:

Precinct	PRCUTS Dwellings	PP Dwellings	Difference
Leichardt	880	707	173
Taverners Hill	451	393	-58
Kings Bay/Croydon	100	416	316

While it is likely that the enrolment demand stemming from the draft proposal can be accommodated within surrounding schools, the draft proposal must be considered in the context of the growth proposed for the wider LGA under the PRCUT's project, which will likely need to be supported by additional educational infrastructure. SINSW is in the process of reviewing this growth in order to identify appropriate solutions to accommodate future projected enrolment demand. This will ensure that existing schools are fully utilised before new schools are considered.

SINSW is committed to working with Council to ensure schools are supporting community needs and continue to be appropriately resourced to respond to student population changes. As a result, SINSW request ongoing engagement with Council regarding any future growth and change identified for the locality.

Planning for PRCUTS and other Growth Initiatives

SINSW uses population and dwelling projection data provided by the Department of Planning, Housing and Infrastructure (DPHI) as the basis for school planning. This data allows SINSW to assess schools within an area or region to identify the best way to distribute student numbers and deliver new and upgraded facilities.

Recent policy changes such as the Affordable Housing Bonus, Build to Rent Program and the Transport Orientated Development Program have potential to deviate from the above data sets and impact a range of site-specific and strategic matters for NSW government schools. This, combined with incremental creep from planning proposals seeking population projections above these assumptions is aiding in educational establishments being at or above capacity upon build completion. The need to then source new land for additional educational establishments is problematic and costly when this situation arises. As a result, SINSW request clarification regarding how Council aims to track and manage the combined growth stemming from the above programs and how this can be accommodated by key social infrastructure within the local government area.



Education

Active Transport and Access

SINSW request that transport planning for the proposal be guided by the NSW Government Movement and Place Framework (MAPF) and its Built Environment Performance indicators. These indicators are based on qualities that contribute to a well-designed built environment and should be used by proponents in the formulation of transport concepts.

The MAPF's core 'Amenity and Use' and 'Primary Schools' indicators are of particular importance to SINSW, as these encourage urban designers to consider the impact on adjacent places/users, as well as emphasising movement that supports place. The 'Primary Schools' indicator provides two specific metrics to judge the effect of infrastructure on the accessibility of public schools in an area, these being walkability and public transport access. These metrics require designers to assess whether proposed infrastructure facilitates access to primary school facilities (or public transport connections to schools) or whether it exacerbates gaps in the network.

The primary school-focused MAPF amenity indicator can be accessed via the link below:

<https://www.movementandplace.nsw.gov.au/place-and-network/built-environment-indicators/primary-schools>