Council of Social Service of New South Wales



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Department of Planning and Infrastructure GPO Box 39 SYDNEY NSW 2001

Dear Sir or Madam

Re: Wentworth Point Urban Activation Precinct

NCOSS welcomes the opportunity to comment on the rezoning proposal for the Wentworth Point Urban Activation Precinct.

Context

As the peak organisation for the non-government community services sector, NCOSS has an interest in this proposal for two main reasons.

Over an extended period of time we have engaged with the NSW Government on the planning framework for the broader Sydney Olympic Park area, which includes Wentworth Point and Newington. The area has been one of the state's key urban renewal projects and has benefited from substantial public investment over three decades in developing world class event venues, extensive parklands and recreation facilities, and public transport infrastructure.

Our more recent submissions on these matters included our submission on the Sydney Olympic Park draft Master Plan 2030 (August 2008) and on proposed amendments to the Planning controls for the already rezoned parts of Wentworth Point (February 2013).

Our other interest relates to the Government's new Urban Activation Precincts (UAPs) agenda. As the Department's guide notes, 'Urban Activation Precincts are important areas that the Minister for Planning and Infrastructure considers have a wider social, economic or environmental significance of a scale that is important to implementing the State's planning objectives... For example, Urban Activation Precincts could facilitate additional housing and jobs on major State government sites, in major renewal precincts or facilitate investment in key economic and employment generating precincts across the State, particularly those close to transport infrastructure' (*NSW Urban Activation Precincts Guideline*, DP&I, October 2012 p. 5).

Given that the first batch of UAPs, including Wentworth Point, were only announced in March this year, the current proposal is an early indicator of how the Department intends to address priority concerns of our sector, particular in relation to affordable housing, community facilities planning and infrastructure investment.

Our view on wider planning policy challenges are set out in our submissions on the Draft Metropolitan Strategy for Sydney to 2031 (July 2013), the North West Rail Corridor Strategy (April 2013) and on the Review of the Affordable Rental Housing SEPP (February 2011).

The rezoning proposal

The proposal as exhibited covers an area of some 18 hectares that is owned by a state government agency, NSW Roads and Maritime Services (RMS). The land adjoins the Parramatta River and Homebush Bay, and is currently occupied by a number of light industrial businesses. The two land parcels comprising the UAP are separated by land owned by the Sydney Olympic Park Authority (SOPA), which includes the existing Olympic Park ferry terminal, car park and future development site.

The Proposal and accompanying Planning Report indicate that the rezoning, if approved, would generate an additional 2,300 apartments and an estimated eventual population of just under 5,000 people. The proposal includes 6 x 25 storey residential buildings and a number of 5 and 7 storey residential buildings. Given that the precinct is not located within walking distance of a either a railway station or a substantial town centre, the proposed density is concerning.

Furthermore the UAP precinct comprises around one quarter of the total suburb of Wentworth Point. The cumulative impact of the UAP proposal, the residential development that has already occurred and the upzoning proposal exhibited earlier this year need to be considered to assess the overall future of Wentworth Point. Such an assessment reveals that the total eventual number of apartments at Wentworth Point could total 9,500, and the suburb's population could ultimately reach 20,000 (Planning Report Appendix J - Community Facilities Study p.9). NCOSS doubts this would be an acceptable planning outcome.

Affordable housing

NCOSS is extremely disappointed that none of the planned additional apartments are to be reserved for affordable rental housing and that there is no Social Impact Study accompanying the proposal.

In our earlier submission on the upzoning proposal NCOSS argued that the developers of residential housing at Wentworth Point were in part selling the amenity produced by significant public investment in Olympic Park. Combined with the acknowledged shortage of affordable rental housing in Sydney, we suggested that there should be at least 5% affordable housing built into the upzoning proposal, if approved.

The fact that the UAP precinct land is owned by a State Government agency makes it even more disappointing that there is no inbuilt affordable housing requirement. We note that the North Ryde Station Precinct UAP does include provision for affordable housing, albeit at a minimal level.

Taking these factors together NCOSS recommends that the Wentworth Point UAP proposal should be amended to include affordable rental housing equivalent to 10% of the total residential development. We have an open mind about the precise mechanism(s) by which this could be achieved.

We recommend that all future UAP rezoning proposals be accompanied by a Social Impact Study.

Community facilities

The Community Facilities Study by Elton Consulting recommends that a community centre be incorporated into the UAP proposal. NCOSS supports the view of Auburn Council that such a centre must be sufficiently large (450 square metres) to be genuinely multipurpose in nature. We do not support suggestions from some quarters that the community centre be incorporated into the previously approved plans for a rowing/kayaking club as these would appear to be incompatible activities.

While NCOSS does not presume to know what other community facilities and services that current and future residents of Wentworth Point need, we are very disappointed with the treatment of these issues in the UAP plans. Reference is made, for example, to a childcare centre to be developed by SOPA at Wentworth Point and a library in Olympic Park Town Centre without any firm indication of the timeframe for their provision or the precise funding that is available.

NCOSS recommends that further consultation occur between the Department, SOPA, Auburn Council and local residents to develop a firm Community Facilities Plan for Wentworth Point, incorporating a detailed and costed plan with an agreed implementation timetable. This should be placed on public exhibition and finalized before any development occurs within the UAP precinct.

Transport and other infrastructure

In terms of state-provided infrastructure, the proposal as exhibited is equally disappointing. The only specific commitments are to a new primary school opening in 2017 and an upgrade of the ferry wharf in 2014-15. Both these commitments appear to predate the UAP proposal.

The treatment of public transport access to Wentworth Point is clearly inadequate. While the bus service improvements canvassed in the proposal would be welcomed as a short term measure, more substantial mass transit options linking residents to both Olympic Park station and Parramatta CBD will clearly be needed in the medium term.

Conclusion

If you require clarification of any aspect of this submission, please do not hesitate to contact Mr Warren Gardiner, Senior Policy Officer, on 02 9211 2599 ext 112 or warren@ncoss.org.au

Yours faithfully

Joanna Quilty Acting CEO