

Department of Planning, Industry and Environment
4 Parramatta Square, 12 Darcy Street
Parramatta NSW 2150

Your Reference	Draft Sydney Olympic Park Master Plan 2030 (Interim Metro Review)
Contact	
Telephone	
Email	

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ATTN:

COUNCIL SUBMISSION

DRAFT SYDNEY OLYMPIC PARK MASTER PLAN 2030 (Interim Metro Review)

Thank you for the opportunity to comment on the proposed amendment to the *State Environmental Planning Policy (State Significant Precincts) 2005* (SSP SEPP) to facilitate the Sydney Olympic Park Master Plan 2030 (Interim Metro Review).

Council officers support concentrating development around major transport nodes. However, Council Officers wish to raise a number of concerns in relation to the changes proposed, and these are detailed below. Please note this is a Council Officer submission that has not been formally endorsed by Council. We look forward to working with the Department to resolve these matters regarding the proposed Interim Metro Review.

Key Concerns

1 Reduction of Green Space

The Interim Metro Review includes a reduction of the Urban Park – Central from 5,780sqm to 3,500sqm. This equates to a reduction in size of approximately 40%. The Planning Report supporting the proposed changes identifies the Interim Metro Review's failure to achieve the size of 0.5-2ha for a local park as per the *NSW Government Architect Greener Places 2020*. This reduction in size in this location and context is inappropriate and is not supported, particularly as it is noted the revised scheme proposes an increase of residential floor area of approximately 35% without providing any new active or passive green space to accommodate this growth in density.

The reduction in size of the Urban Park – Central is not justified, and the quantum of green space in this area should not be offset with further embellishment of nearby parks. Additional greenspace should be provided commensurate to the increase in density that is publicly accessible and usable for incoming residents to this location.

In addition, the *Sydney Olympic Park Master Plan 2030 Review 2018 Appendix B – New Public Spaces* notes that the alignment of the park should front the State Heritage listed Abattoir Heritage Precinct which includes the Abattoir Garden. The proposed reduction in size of the Urban Park – Central subsequently reduces the amount of park area fronting the Abattoir Garden and should at the very least be re-established to ensure this interface is maintained.

2 Proposed Residential Component

Council officers also have a number of concerns in relation to the proposed increase in residential Gross Floor Area (GFA). Principally, the additional area of residential GFA is provided further north and encroaches significantly into the established Central Precincts commercial core. The encroachment reduces the buffer

Contact us:

council@cityofparramatta.nsw.gov.au | 02 9806 5050
@cityofparramatta | PO Box 32, Parramatta, NSW 2124
ABN 49 907 174 773 | cityofparramatta.nsw.gov.au

which exists in the current master plan and includes residential components in areas that are identified in *Annexure 5: Acoustic Report* that will require substantial noise mitigation to achieve acoustic suitability for residential development.

The proposed residential components also adjoin the proposed 'plaza' which is a key arterial thoroughfare for pedestrian traffic during events. While *Annexure 5: Acoustic Report* states "*residents would be aware of their proximity to the Stadium and the Metro station*", Council officers do not consider this an acceptable justification for residential development in this location. Commercial uses would be more suitable for areas that would be subject to high noise levels and traffic volumes, particularly during the late evening once major events have concluded.

The increase in residential GFA and the encroachment of the residential uses closer to established sporting and entertainment venues will compromise Sydney Olympic Park event hosting capacity, contrary to the strategic plan for the area.

The Planning Report also states "*Residential floor space is proposed to be increased to improve development feasibility*" which cannot be considered as a suitable justification for a development on planning grounds. The proposed increases in residential floorspace have not been sufficiently investigated to ensure local infrastructure can accommodate the proposed increase in population and therefore in the absence of this information they are not supported by Council officers. **3 Reduction in Commercial Floor Area**

The Central Precinct is identified as a key commercial hub within Sydney Olympic Park, however the proposed changes to the Master Plan seek a reduction of non-residential floor area from 102,844sqm to 50,909sqm that equates to a 50% total reduction of non-residential floor area.

Sydney Olympic Park Master Plan 2030 Review 2018 Part 3 emphasises the principle of "*locating commercial and retail land uses around Olympic Park Station and close to local bus service corridors*". Also, *The Greater Sydney Commission: Greater Sydney Region Plan, A Metropolis of Three Cities* identifies Sydney Olympic Park as one of nine standalone office market centres. This reduction of non-residential floor area around the Metro Station to facilitate a significant increase in residential development significantly undermines the broader strategic framework and is unjustified on planning grounds.

It should be noted that the current higher provision of non-residential floor area has been used in transport studies which form part of the justification for increased infrastructure spending in the area. It would be disingenuous to use the provision of this commercial floor space as a justification for infrastructure spending and then subsequently remove its provision to enable more residential development. Council officers therefore do not support any reduction to non-residential floor area within such proximity to key transport infrastructure.

The *Sydney Olympic Park Retail Masterplan Vision and Strategy (Annexure 10)* identifies a significant future retail demand for the area. It states *Sydney Olympic Park's projected audience growth of residents, visitors and workers will require 122,000 SQM of retail by 2031 (Hill PDA)*. The Planning Report recognises the requirement for commercial and employment spaces and suggests the loss can be recouped on the balance of sites to be developed. Council officers do not support this approach and considers it a more appropriate strategy to maintain the commercial core area in close proximity to key transport infrastructure. Assuming that the future demand for commercial space can be accommodated on other sites in the future is a shortcoming in the Interim Metro Review that cannot be supported without a proper strategy for how this latent demand will be met.

4 Transport Issues

Proposed Transport Strategy

Train passenger pre-loading space in the vicinity of the proposed Metro station is 20,400 people, including use of Olympic Boulevard. Stadium Australia's seating capacity is 83,500 people with 60% identified as travelling by train, indicating that approximately 50,000 people may proceed to the station for major events.

Given Sydney Olympic Park is capable of hosting concurrent large attendance events, even with use of the existing heavy rail station, a pre-loading space of 20,400 may be insufficient.

The Transport Strategy shows daily public transport use from March 2019. This is immaterial as the Metro Station and its precinct needs to be design for event volumes and not everyday resident and worker volumes.

The Strategy also identifies private vehicle and freight access constrained to a small number of streets. Further investigation is necessary to identify how property access and businesses fronting non-trafficable streets will be serviced, and what provisions will be made for on-street loading zones.

Traffic impact estimates rely on Parramatta Light Rail Stage 2 (PLR). However PLR has not been funded for construction and has not been committed to by the State Government. Although Council is very supportive of PLR Stage 2, traffic studies should also take into consideration scenarios which do not rely on PLR. Council supports SOPA's intention to appoint a workplace travel officer to assist in delivering travel demand management programs. Council suggests that as the precinct is managed by a State Government Authority, there is an opportunity for a robust application of travel demand management including establishment of a Travel Management Association (TMA) to centrally manage green travel planning for the precinct. Participation in a TMA could be tied to land use approvals. In addition to requiring green travel plans for workplaces, it is recommended green travel plans for new residential developments are also considered.

Bus Servicing and Interchange

Future proposed light rail and bus connections to the Central Precinct figures provided indicate bus services from Newington will be reduced, forcing a transfer to the light rail at its stop in Carter Street to access Metro. Council strongly recommends that feeder bus servicing to the Olympic Park Metro Station be re-considered to provide direct bus connections between the station and Newington and Silverwater. Council first highlighted the importance of these bus connections in its submission to the Metro West Project overview in May 2018. In Council's response to the exhibition of the EIS for Metro West concept and stage 1 in July 2020, Council highlighted the critical interchange function of the Olympic Park station, and the need for "ample interchange facilities to accommodate increased bus services for residents, workers and visitors from surrounding suburbs including Wentworth Point, Newington, and North Lidcombe." Council supports a location of a bus interchange proximate to the planned metro station, however it stresses the need for planning for direct feeder services from surrounding suburbs. Council recommends that these routes and services are planned now, as part of this masterplan review, and interchange facilities are sized appropriately to accommodate these critical connections.

Car Parking Provision

The Olympic Peninsula is served by a very constrained arterial road network, it is recommended to consider car parking requirements for new development which will help to reduce private vehicle usage and increase usage of public transport, walking and cycling. The metro station will be easily accessed by all commercial and residential development in the precinct.

It is recommended that the maximum parking rates proposed by Council in its CBD Planning Proposal that are also adopted as maximum parking rates used by City of Sydney Council are applied to the Central Precinct to better achieve the density and activation goals for the precinct, without causing undue congestion on the local and regional road networks. These maximum rates are lower than the rates currently proposed for the Central Precinct. These include maximum provision of 0.1 spaces per studio dwelling, 0.3 spaces per 1-bedroom dwelling, 0.7 spaces per 2-bedroom dwelling, and 1 space per 3 or more-bedroom dwelling for residential uses. Commercial uses are allowed a maximum number of spaces derived by a formula based on block size. If the Floor Space Ratio (FSR) is greater than 3.5:1, the formula is $M = (G * A) / (50 * T)$, where: M = maximum number of parking spaces; G = GFA, A = Site Area, and T is the total GFA of all buildings on the site. If the FSR 3.5:1 or lower, than office /business uses are allowed up to 1 space per 175 sqm GFA, and retail up to 1 space per 90 sqm.

The discussion of off street parking should go further to identify both the high provision of public parking associated with venues, and how parking usage of those venues can be managed to discourage commuter parking and support local businesses, visitation and activation of the precinct.

Cycling

Cycling is a major component of transport strategy within Sydney Olympic Park, cycle routes need to be included in the street hierarchy plan. The Interim Metro Review does not provide adequate active transport connectivity or cycle routes to major cycleways such as the M4 shared path or the Parramatta Valley Cycleway. Consideration must be given to what proportion of event attendees would cycle if separated or off road cycle routes connecting major cycleways were added. Opportunities to improve active transport integration include:

- separated active transport facilities along Olympic Boulevard, Dawn Fraser Avenue and Uhrig Road
- new east west cycle facilities along Parramatta Road
- new cycle connection across Parramatta Road and M4.

5 Urban Design

More detail needs to be provided to demonstrate how the changes to the built form identified in the Interim Metro Review can meet the building depth provisions under the current General Controls contained in the *Sydney Olympic Park Master Plan 2030 Review 2018 Part 4.0 General Controls and Guidelines*.

The significant increases in building heights will result in additional overshadowing impacts to the South. Further studies need to be undertaken to ensure adequate solar access can be achieved for development surrounding the site.

6 Community Facilities

The Interim Metro Review provides approximately 5,400sqm of public plaza space that is identified in the Planning Report as space that *could be used by residents, workers, students and visitors to spend time and gather in passive and low impact (e.g. non-sport based) activities in non-event mode*. Annexure 4: Transport Strategy outlines the Plaza is a requirement for the operation of the Metro Station during large events. Any additional community space provided should have the capacity to operate as community space independently of the Metro Station operational requirements.

The Interim Metro Review nominates 3,500sqm community centre which Annexure 8: Community Facilities Strategy states “Reflects current recommendations in the CoP’s Community Infrastructure Strategy (2020) for the delivery of a regional level community hub in SOP of 3,000-3,500sqm”. However, the number quoted in the ‘CoP’s Community Infrastructure Strategy (2020)’ is based on the current Sydney Olympic Park Master Plan 2030 Review 2018 residential figures and does not accommodate the proposed 35% increase in residential floor space included in the Interim Metro Review. A commensurate increase in community centre space above that already identified would be required to adequately meet the needs of the resultant increase in population.

In addition, insufficient information is provided in relation to the proposed community centre’s location. Any community centre of this nature must have a defined street address, be fully accessible, operate independently of any operational requirement of the Metro Station, and should adjoin proposed open spaces.

Council officers consider the proposed provisions of community facilities inadequate, the facilities proposed are identified in current community infrastructure strategies based on existing residential floor area. The Interim Metro Review does not provide sufficient social infrastructure to accommodate the proposed population increase due to the increase in residential floor area.

7 Conclusion

Council is supportive of the proposed Sydney Metro West station in this location however further refinement of the Interim Metro Review is required. The issues identified above should be addressed in order to support and maintain Sydney Olympic Park's capacity to fulfill its intended role as New South Wales' premier major events precinct and to allow sustainable growth in the future.

As a result the Interim Metro Review in its current form detracts from, and has the potential to undermine, the broader vision for Sydney Olympic Park set out in *The Greater Sydney Commission: Greater Sydney Region Plan, A Metropolis of Three Cities* 2018. The strategy identifies Sydney Olympic Park as the premier lifestyle precinct, and has the potential to compromise Sydney Olympic Park's major event hosting capacity. The currently proposed configuration of land use around the proposed Metro Station does not utilise land closest to the transport hub to its full potential.

Given the above, it is considered that the Interim Metro Review in its current form does not promote the orderly and economic use and development of land, or promote good design and amenity of the built environment and the range of different issues identified in this submission need to be addressed to resolve these important matters.

Thank you for providing the opportunity to comment on Interim Metro Review. Please contact the officer indicated above if you wish to discuss this submission in further detail.

Regards



Jennifer Concato Executive Director City Planning and Design