

15 December 2023

Inner West Council
PO Box 14
PETERSHAM NSW 2049

Electronic submission

Attn: Strategic Planning: Parramatta Road Planning Proposal

Planning Proposal Parramatta Road Corridor Implementation Stage 1

Urban Taskforce Australia welcomes the overdue release of the first stage of the Parramatta Road Corridor Urban Transformation Strategy (PRCUTS). Seven years after the former State Government approved the Strategy, it is disappointing to see a limited stage one proposal.

Given the housing supply crisis facing NSW, the Parramatta Road corridor has tremendous potential to not only transform a run-down eye sore in the inner suburbs of Sydney, but to deliver significant well-located housing in areas characterised by high amenity.

Unfortunately, the planning proposal by Inner West is conservative and fails to realise the opportunities along the corridor for housing, jobs and urban renewal.

Housing targets too low

The scope of the Planning Proposal is very conservative, to a point where its aims in terms of housing merely seeks to address a shortfall of approximately 1,600 dwellings that Inner West Council has thus far failed to deliver in terms of the existing Greater City Commission housing targets from 2021.

It would appear that a key factor in driving the 1,600 target is to remain eligible for a \$4.75 million grant under the NSW Public Spaces Legacy Program. The relevant Council report states that:

“The subject Planning Proposal meets these requirements and will facilitate sufficient dwelling and employment yield to satisfy the relevant obligations under the Program.”¹

This apparent opportunism rather than a sound strategic planning should not be the basis of determining housing strategies along the Parramatta Road corridor.

There is a stark contrast between the attitudes and approach taken by Inner West Council and adjoining Councils. This is holding back the renewal of the

¹ Inner West, Parramatta Road Corridor (Stage 1 LEP Phase 2A), 29 March 2022, p.1

Parramatta Road corridor. Burwood Council has proposals for developments up to 32 stories. Canada Bay Council is proposing up to 24 stories. Inner West council is sticking with 3 to 6 stories. Council is failing to appreciate the opportunities for housing along the corridor and must look to replicate the densities proposed by the like of Burwood and Canada Bay.

This planning proposal reduces the additional dwellings proposed through the growth projections in 2016 Strategy by 5%. This belies the reality of the housing supply crisis (which has deteriorated significantly since 2016) and the need for all councils, particular well-located councils like Inner West Council, to deliver more housing, not less.

As such the housing figures presented in the Planning Proposal breach two of the key objectives of the planning proposal, namely

1. Ensure that Inner West is a place that supports a high quality of life; embraces diversity and adapts to the population needs of the future; and
2. Ensure the ongoing provision of dwellings and employment floor space in the Inner West to meet the NSW Government's dwelling and employment targets.

Given the opportunities and location of the corridor, a far more ambitious target should be set. As Council would be aware, the Department of Planning and Environment has assumed responsibility for the former Greater City Commission's task of setting new housing targets. Besides the potential for high targets, the National Housing Accord has set NSW a statewide target of 376,000 new dwellings in the five years to June 2026.

Urban Taskforce recommends that Council re-examine the housing targets for Stage One and subsequent stages once the NSW Government announces targets as part of the preparation of the new Sydney Region Plan (and district plans). There must be a reappraisal of the potential of the Parramatta Road corridor in achieving higher housing targets.

Recommendation 1: that, as a matter of priority, Inner West Council review the housing targets for the three precincts, as well as housing targets in subsequent stages, once new housing targets for individual LGAs are finalised by the NSW Government.

Holistic approach to the Parramatta Road Corridor

Six years after the PRCUTS was approved by the Government, Inner West has only now come up with Stage 1 of the implementation which entails three precincts. All stages of the corridor should have been prepared and finalised concurrently.

The corridor must be planned as a whole. Clearly this would take into account the differing character of each suburb along the corridor, but so far, the entire

corridor is an embarrassment. This requires a plan centred around mixed-use zoning right along the corridor, accompanied by medium to high density residential development in key locations to deliver an active and sustainable corridor that will transform Parramatta Road.

Recommendation 2: that Inner West Council prioritises the remaining lands contained within the Inner West LGA section of the PRCUTS and finalises subsequent stages of the implementation plan as a matter of priority.

Infrastructure

Urban Taskforce strongly disputes the claim in the Planning Proposal (p.125) that there is insufficient public infrastructure to support the proposal levels of growth.

There is no issue with water infrastructure. West Connex has significantly reduced traffic on Parramatta Road. The parks and green spaces throughout Sydney's inner west are established green spaces and are the envy of Sydney.

Recommendation 3: that the Planning Proposal notes the relative abundance of infrastructure close to the Parramatta Road corridor and removes the misleading reference to insufficient public infrastructure in the draft proposal

Heights and densities

The proposed heights and densities for the three precincts are too conservative, do not reflect the potential of the corridor, and will work against the feasibility of any housing development.

At its core, an FSR of at least 3:1 and a minimum of 21 metres (approximately 6 storeys) throughout the three precincts should be seen as a minimum and is not feasible or applicable for opportunity sites. This is the approach adopted by the NSW Government for the purpose of increasing height and density in the 31 Tier 2 TOD precincts.

Parramatta Road and surrounds should generally comprise a built environment of somewhere between six to eight stories, in keeping with a vision of creating a mixed used boulevard close to jobs and transport links.

Higher density residential needs to be delivered in strategic locations, particularly the Tavener's Hill precinct which is well serviced by buses, heavy rail and light rail.

Opportunity sites identified in the Leichhardt Precinct should receive significant uplift beyond the 20 metres HoB and FSR of 3:1 as contained in the planning proposal in order to generate new investment and renewal, as well as providing much needed housing supply.

This will improve the feasibility of developments along the corridor, and ensure commercial space is supported by an appropriate amount of residential. This is the Parisian boulevard approach spoken about by the Minns Government.

Further heights should be considered where there is public benefit, in keeping with the urban design principles befitting a significant corridor like Parramatta Road.

Recommendation 4: that Inner West Council establishes a minimum Floor Space Ratio of 3:1 and a minimum height of 21 metres for sites immediately adjoining Parramatta Road, (currently zoned B2, B6 and IN2) and allows further uplift where public benefit is delivered.

Affordable housing levies

The Proposal envisages an affordable housing levy for the Leichhardt precinct of 2% of the Residential Strata Area is noted as being at the lower end, but remains completely unfeasible due to the low density and height proposed.

It is noted that the DPE's viability tool indicates that such a levy is not viable at Tavener's Hill and Kings Bay/Croydon. Give the prevailing circumstances in development finance, even if the 2% levy was deemed viable, it must be acknowledged by Council that these levies will be passed on as an additional cost for the new home buyers.

Local affordable housing levies have proven ineffective in terms of delivering more housing, and generally acts as a barrier to the delivery of further market housing.

The State Government approach through its amendments to the Housing SEPP , offering stands a better chance of success in terms of more market and affordable housing.

The "double dipping" of local and state affordable housing contributions affects the feasibility of development.

The small number of councils (including Inner West) that have local affordable housing levies should abandon such levies and allow a fairer, consistent statewide approach to the delivery of affordable housing policy.

Recommendation 5: that the Inner West council remove the 2% affordable housing levy for the Leichhardt precinct and adopt the principles contained within the NSW Government's infill affordable housing policy once finalised

Heritage listings

The proposed heritage listings are, in their volume and detail, opposed by Urban Taskforce, in particular proposed wholesale listings of electricity substations. Inner West Council recently dropped a proposed heritage listing of numerous electricity substations in the LGA.

The proposals in the Stage 1 implementation plan should also be removed. Heritage listings should be reserved for a select number of the best examples of relevant heritage items. The proposed listings go over the top and threaten social licence as millennials are effectively locked out of housing in these suburbs.

The Minister for Planning has gone on record warning Councils not to use local heritage listings as a means of thwarting housing. The heritage listings proposed in the Stage 1 Planning proposal should not proceed. If listings do proceed, Council must allow for greater density to ensure it carries its weight in relation to housing targets.

Recommendation 6: that the local heritage items be rationalised to ensure that only those that are significant are listed as part of the Planning Proposal so housing supply

Car Parking

The level of prescription in terms of parking is opposed. The private sector is best placed to determine the amount of parking required in associated with residential developments.

To restrict development to one space for a 3 bedroom development as is the case in the Leichhardt and Taverners Hill precincts, and only 1.2 spaces per 3 bedroom apartment in the case of Kings Bay clearly represents a barrier for key workers, shift workers, and tradespeople who often require an additional vehicle for work purposes.

Recommendation 8: that the Planning Proposal remove proposed car parking rates and allow the private sector to determine the right mix of car parking associated with residential development and demand

Comments on individual precincts

1. Leichhardt precinct

The Leichhardt precinct, centred on the intersection of Parramatta Road and Norton St, is a strategic centre that has the opportunity to deliver more residential and commercial opportunities. The current approach has left a tired, ramshackled precinct that belies its location and potential.

Yet some areas of uplift have been reduced as per the Architectus study.

Other areas have insufficient heights and FSR's. The fragmented land ownership and cost of acquisition makes feasibility of development challenging. Medium density development, of between 6-8 storeys, is needed to enable the private sector to deliver the housing needed and demanded of the precinct.

Recommendation 9: maintain original heights as identified by Architectus (17-22 metres) for area 6 in the proposed Height and FSR map and introduce a minimum 3:1 FSR with a corresponding height of 21 metres in all other sites not identified as opportunity sites.

Strategic opportunity sites identified in the precinct as areas 1-5 (Leichhardt – proposed opportunity sites map) proposed are ripe for additional height and density, yet the proposal places a caveat on this uplift “where public benefit is provided”.

The delivery of housing is, in itself, a very much needed public benefit. Just ask the millennial generation who have been locked out by conservative thinking in the Inner West.

The proposal should note the need for more housing and establish ambitious heights and FSR's in these areas, while recognising the public benefit of this approach.

Recommendation 10: that sites in the proposed opportunity sites map for Leichhardt precinct (denoted as sites 1-5) receive significant uplift in the adopted planning proposal to incentivise the delivery of more housing, which is in itself serves in part as a public benefit

2. Taverner's Hill

Industrial lands

Urban Taskforce objects to the retention of industrial and employment lands within the northern part of the Taverners Hill precinct.

The nature of light industrial land use is constantly evolving, and these days does not preclude placing housing in and above light industrial purposes.

Mixed used zoning will facilitate a more vibrant precinct, close to light rail and bus routes along Parramatta Road, and within 1 kilometre of Lewisham Station.

The light industrial zone (IN2) should be replaced by mixed use zoning (B4). This will allow the market to determine the optimal mix of residential and employment lands. The land use in Taverner's Hill is very light, low impact commercial and industrial. Provided jobs are preserved or even increased, there is no reason not to change this area to allow for mixed use development.

The Taverners Hill precinct is ideal for the transit-oriented development precincts currently proposed by the Minister's Government. It is important that this planning proposal identifies key precincts along Parramatta Road that can accommodate the housing and employment land required for a transit-oriented development precinct. Taverner's Hill is such one.

The proposed heights and FSRs are conservative and should be increased to match the development known as Leichardt Green on Upward Street. This will provide the opportunity to deliver both residential and employment opportunities in a strategic location.

Recommendation 11: that the planning proposal replace IN2 zoning for the Taverner's Hill precinct with mixed use B4 zoning, with heights matching those of the Leichardt Green development

Zoning—precinct south of Parramatta Road

The southern side of the Taverners Hill precinct is far too conservative as it only proposes a very small part of the sub-precinct for high density residential (R4).

Given its strategic location, close to heavy and light rail, as well as buses, the entire Taverner's Hill precinct south of Parramatta Road should be zoned high density. This entire sub-precinct should be considered an opportunity site.

Recommendation 12: that the Taverners Hill precinct south of Parramatta Road be appropriately zoned medium to high density residential with appropriate heights and FSRs established, with potential height and FSR bonuses for public benefits

3. Kings Bay/Croydon

Disappointingly there appears to be little more housing within this precinct. The precinct is 800 metres from the proposed Five Dock Metro Station. The R2 zone should be replaced by an R3 zone with appropriate heights and setbacks so as to blend in with the adjoining residential neighbourhood.

The preservation of R2 and conservative height and FSR restrictions in the part of the precinct bounded by Croydon Road and Iron Cove Creek is of considerable concern, given its proximity to transport.

This is an ideal opportunity to offer height and density that would remove the ugly preponderance of used car sales yards and deliver housing serviced by a brand new Metro station. This needs another look.

The IN2 zone within the precinct should be replaced by a B4 zone to match the adjoining B4 zone and provide maximum flexibility to deliver more housing and employment opportunities.

Recommendation 13: that within the Kings Bay zone, R2 zoning be increased to R3, and IN2 zone changed to B4 mixed use with an FSR of 3:1 and increase heights of 21 metres applied to the mix used zone, as well as allowing further uplift where public benefit is delivered.

If it is all too hard, Council should hand planning responsibility for Parramatta Road Corridor to DPE

Given the state significance of the Parramatta Road corridor, the urgency of the National Housing Accord targets, the Minns Government's stated intentions around transit-oriented development, the commitment that development be shared more fairly across the Sydney basin, Council should revise its approach to development along Parramatta Road or hand over responsibility for the rezoning and approval of development within the Inner West part of the PRCUTS to the Department of Planning.

Significant work was commenced under the former Urban Growth within the NSW Government, prior to it being perfunctorily discarded and responsibility for the future for the corridor handed back to local government.

This planning proposal demonstrates that Inner West Council is either unwilling or unable to undertake the strategic planning required to realise the objectives of PRCUTS.

Given the constraints of council in terms of resourcing and vision for the corridor, along with the need to plan for the entirety of the corridor, it is recommended that Council seek to hand back responsibility of the PRCUTS and the planning work required to the Department of Planning.

A State led rezoning process would allow a broader lens to be placed over the corridor and perhaps act as the first step in the State assuming responsibility for all rezoning along the corridor.

By handing over such responsibilities to DPE, Council will benefit by being able to allocate resources to more local planning matters, which will hopefully speed up the processing of other development applications.

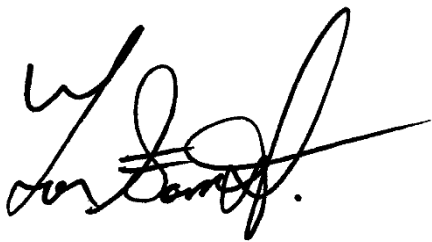
In the middle of a housing supply crisis and the abundance of potential opportunities that exist in the corridor within the Inner West LGA boundaries, if Council is unable to strategically plan for the corridor beyond the immediate concerns of it is in the broader public interest for Council to resolve to write to the NSW Department of Planning and Environment and hand over the responsible

for the strategic planning and rezoning of the Parramatta Road corridor to the NSW Government.

Recommendation 14: should Inner West Council continue to struggle with reconciling local opposition with the need to deliver more housing and employment opportunities along Parramatta Road and surrounds, it should consider a resolution to hand back planning responsibilities to the Department of Planning to take over the strategic planning and rezoning of Stage 1 and all other subsequent stages associated with the Inner West LGA component of the Parramatta Road Corridor Urban Transformation Strategy (PRCUTS)

Should you wish to discuss this matter further, please call our Head of Policy, Planning and Research, Stephen Fenn on 9238 3969 or via email stephen@urbantaskforce.com.au.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Tom Forrest', with a stylized flourish extending to the right.

Tom Forrest
Chief Executive Officer