

Australian Institute of
Landscape Architects

31/03/2021

To

NSW Government

Department of Planning Industry and
Environment

Submission by the Australian Institute of Landscape Architects (AILA) NSW Chapter
Draft Westmead Place Strategy 2036

PREFACE

The Australian Institute of Landscape Architects (AILA) is the peak national body for the Landscape Architecture. AILA champions quality design for public open spaces, stronger communities, and greater environmental stewardship. We provide our members with training, recognition, and a community of practice, to share knowledge, ideas and action. With our members, we anticipate and develop a leading position on issues of concern in landscape architecture. Alongside government and allied professions, we work to improve the design and planning of the natural and built environment.

In operation since 1966, AILA represents over 3,500 members and promotes excellence in planning, design and management for life outdoors. Committed to designing and creating better spaces in Australia, landscape architects have the skills and expertise to improve the nation's liveability through a unique approach to planning issues via innovative integrated solutions. In doing so, landscape architects contribute towards better environmental, social and economic outcomes for all Australians.

The Westmead Place Strategy 2036 holds state, national and global level potential for urban renewal to enhance the quality of place within its context of world heritage significance. Westmead landscape is integral to the landscape setting of City of Parramatta's historic precinct and is subject to the NSW Premier's 50-year Parkland Vision, Greener Places and Better Placed policies. For these reasons, the Draft Place Strategy is scrutinised. The Institute is concerned

that the negotiations between conservation and development within the Draft Place Strategy are unresolved in three ways; Direction 9 underestimates the negative impact of incremental erosion of existing public space, Direction 10 offers no firm provision of new open space and, relevant landscape studies are implied but not comprehensively reflected. This submission considers the Strategy in relation to landscape heritage, the Green Grid and the continuing story of wellbeing at all levels.

LANDSCAPE HERITAGE SIGNIFICANCE

The joint AIA/ AILA submission on the Draft Parramatta North Urban Transformation Precinct DCP and DA /1123/2016, identified the basis of development as 'the conservation, interpretation and enhancement of its heritage significance as a whole'. Critically, the World Heritage significance of North Parramatta must remain intact and legible through the preservation of historic spatial relationships, plantings and integrated public domain. It determined that the masterplan, a public domain plan and a comprehensive envelope strategy be developed, prior to consideration of subdivision.

The relationship between Westmead Place Strategy and the Parramatta North Historic Sites of national and world heritage significance, is strongly evident as the Westmead landscape forms part of the collection of 'globally unique colonial mental health sites linked by the Parramatta River'¹. Significant landscape, including the historic asylum grounds and botanic garden, of which City of Parramatta has no other, must be protected for its many layers of value including:

- Future-proofing as open space, for the wellbeing for humans and all ecological services.
- Green space for humans and all life forms and processes
- Heritage as an important part of the shared history of this place, to First Nation people, to the Nation and to the World,
- Cultural value as the historic landscape evidence of mental healthcare
- Health value to the public as a continuum of landscape for well-being, and to enjoy the legacy of centuries of connected, green public domain.
- The Precinct is not to be undervalued, absorbed or eroded, as it forms an integral part of the existing historic cultural, green open space. It is irreplaceable.

Landscape heritage is critical to the quality of the place. It is complex, encompasses landscape across jurisdictional boundaries, and is easily overlooked in urban renewal plans and incremental development approvals. Westmead's government sites are linked to aboriginal history and the development of settlement in Australia. The pattern of colonial civic places, integrating views, landscape qualities and early architecture, interconnecting public domain along Parramatta's waterway, the development of 18th and 19th Century landscape design philosophies at Parramatta Park and associated institutional landscapes must remain legible and demonstrably respected in urban strategies such as this.

¹ AIA/ AILA submission on the Draft Parramatta North Urban Transformation Precinct DCP and DA /1123/2016

Action D10.A1 refers to a future precinct-wide open space strategy and opportunities. This is welcomed but must be prioritised and take into consideration previous heritage studies. It will not be effective if left to incremental development approvals.

RECOMMENDATIONS

AILA recommends the Strategy undertake and reflect comprehensive landscape heritage assessment to meet these needs;

1. Demonstrate how the Strategy respects and implements the recommendations of heritage studies and Conservation Management Plans for North Parramatta by landscape heritage experts Geoffrey Britton, Colleen Morris, Chris Betteridge and Craig Burton.
2. The strategy must propose new and well-designed existing open space to support the densification and relieve pressure on World Heritage Parramatta Park. Opportunities (Action D10.A1) within the Parramatta Park Precinct must clearly demonstrate sensitivity to the heritage value and not constitute incremental 'activation' developments.
3. The opportunities not addressed include;
 - a. Recognise and protect aboriginal heritage
 - b. Consider reinstatement of Parramatta Park to its original extent and enhance the narrative of estate management in this historic setting and its role in the interpretation of the post 1788 history of Australia
 - c. Celebrate the narrative of historic landscape design for mental health and wellbeing, linked along the foreshore to Gladesville and Callan Park, including the cultural significance of the people and periods reflected in tree plantations
 - d. Review and extend the Parramatta Park Trust lands to include all historic lands to be conserved, including the National Heritage listed Female Factory under consideration by UNESCO.

PARKLAND VISION AND GREENER PLACES

The incremental destruction of historic public open space in the City of Parramatta LGA does not align with the numerous guidelines and NSW Government and Greater Sydney Commission policy such as the Greener Places work including the Green Grid, the Premier's 50-year Parkland Vision, Better Places or Public Open Space strategies. Any diminution of area or undermining of heritage and green space integrity is unacceptable.

In relation to the Westmead Place Strategy, the Institute is not satisfied that the heritage value of irreplicable existing public domain is adequately considered in the Draft Strategy, raising concern that the cumulative impact may be detrimental to shared history and wellbeing, globally.

RECOMMENDATIONS

AILA recommends the Strategy undertake comprehensive open space assessment to guide the Strategy and address these concerns:

1. The Strategy does not adequately reflect the findings of a current study undertaken by specialist Landscape Architects to assess the implementation of the Green Grid, part of the DPIE Greener Places work.
2. Provision of high quality and diverse open space in addition to Parramatta Park to meet the needs of school students, workers and residents is unresolved. To be effective this strategy must be integrated and proactively established in the Draft Place Strategy and not left to an ad-hoc basis after other land uses are determined.
3. Revise and expand proposed open space in Toongabbie Creek, Parramatta River and Darling Mills Creek, with realistic analysis of steep riverbank slope, to adequately meet the needs of students, residents and workers.

SUMMARY

The Draft Westmead strategy highlights three concerns of critical importance for the future of City of Parramatta and Cumberland City; to conserve and enhance the historic significance of the landscape, to provide a diverse range of high-quality open space and to integrate planning at all levels. AILA strongly recommends the Strategy address gaps in proactive, definitive provision of open space, robust protection of landscape heritage and diligence to respect State and Greater Sydney Commission level landscape studies, including the draft Green Grid implementation, at this stage, before approval be granted.



Tanya Wood,

AILA NSW Vice- President

SUBMISSION TEAM: AILA Landscape Heritage Group, FAILA

Creating for Generations

31 March 2021

Ms Catherine Van Laeren
Executive Director – Central River City
Department of Planning, Industry and Environment
Locked Bag 5022
PARRAMATTA NSW 2124

Dear Ms Van Laeren,

Westmead 2036 – Draft Place Strategy

The Property Council of Australia welcomes the opportunity to provide the Department with comments on the Westmead 2036 Draft Place Strategy.

As Australia's peak representative of the property and construction industry, the Property Council's members include investors, owners, managers and developer of property across all asset classes. Please find attached our response to the exhibition of the Strategy.

The unprecedented transport, health and education investment at Westmead creates enormous opportunities for this precinct. The Property Council is broadly supportive of the NSW Government's ambition to deliver an additional 30,000 jobs across the precinct by 2036, making it one of the largest centres of employment in Western Sydney. Our submission seeks to further refine the specific actions of the Strategy, while also making recommendations for future governance and delivery to ensure the aspirations for Westmead are properly realised.

Should you have any questions regarding the content of this submission please contact Troy _____ or Ross Grove, _____

Yours sincerely,



Jane Fitzgerald
NSW Executive Director
Property Council of Australia

Submission to Department of Planning, Industry and Environment

Westmead 2036 Draft Place Strategy

31 March 2021

1.0 Introduction

The Property Council welcomes the opportunity to provide comments on the Westmead 2036 Draft Place Strategy (**the Strategy**) released in December 2020.

The Westmead precinct (**the Precinct**) is located within the Greater Parramatta and Olympic Peninsula (**GPOP**) and represents two of the 26 precincts (Westmead Health and Westmead South) within the economic corridor.

Westmead is one of the largest health, education and research precincts in Australia and supports a strong workforce of skilled professionals. Current employment projections for the Precinct will see its workforce increase to more than 30,000 in less than twenty years.

We welcome the development of a Place Strategy for Westmead that is consistent with the Central City District Plan and Greater Sydney Regional Plan and supports the implementation of both these plans.

2.0 Vision & Five Big Moves

The Strategy identifies the following vision for the Precinct:

“The vision for Westmead is to be Australia’s premier health and innovation district – an ecosystem for new discoveries, economic growth and global recognition. Westmead will also deliver exceptional place outcomes for the Central River City, with enhanced heritage and environmental assets, activated places, connected communities and housing choice.”

To deliver this vision “five big moves” have been identified and these themes indirectly inform the actions, which our submission addresses in Appendix 1:

- Drive change in the innovation eco-system to accelerate delivery of Australia’s premier health and innovation district.
- Cherish and protect places of significance, conserve and revitalise heritage and cultural assets to create exceptional places.
- Activate and connect our community with vibrant, diverse and well-connected public spaces and places.
- Deliver high quality and diverse housing for students, workers and professionals with optimal liveability outcomes.
- Capitalise on transport connectivity and reduce car dependency.

The Property Council is broadly supportive of the Vision and Five Big Moves for the Westmead Precinct. We also support amendments to this portion of the Strategy to account for the likelihood that key destinations, particularly within the Parramatta North Precinct, will attract visitors from outside the region.

3.0 Sub-precincts

Sub-precinct 1: Westmead South

The Strategy seeks to provide “a walkable residential neighbourhood, transformed by the proposed Metro Station to increase connectivity, offering housing choice and diversity with an urban village at its heart.”

The Property Council supports the approach of delivering greater residential density in proximity to new mass-transit infrastructure, such as the Sydney Metro West.

We note the draft strategy identifies a future Heritage Character Conservation Area in the streets surrounding the Oakes Centre, which formed part of a 1948 public housing estate.

While there are items of local heritage within this area, many of these residential and commercial buildings are of limited suitability to Westmead's current and future population and require either replacement or significant modification to provide a quality living spaces, improved amenity and retail experience.

The key outcomes for this precinct also articulate a broad vision for amenity-led development, green grid connections, rail crossings, wayfinding and placemaking. These are all geared toward making the areas immediately outside of where people live more attractive, walkable and capable of supporting an increased population and are supported by the Property Council. **Any plans to increase public open space should be identified at the earliest opportunity to provide certainty to industry.**

Sub-precinct 2: Health and Innovation

At the heart of the Westmead Place Strategy lies the Health and Innovation Precinct. This sub-precinct has been the subject of unprecedented public and private investment in the 50 years since Westmead Hospital was built and the strategy correctly identifies this industry as the key anchor for future economic activity within the area.

The key outcomes sought for the precinct relate to enabling better pedestrian and public transport access to the precinct and this approach is supported. It has been suggested in the City of Parramatta Council's submission that this precinct may be the location of a new public school for Westmead. **The impact of a future decision to locate another school, along with the City of Parramatta's suggestion for an alternate location, should be considered as part of the finalisation of the place strategy.**

Sub-precinct 3: Westmead East

The Strategy proposes "A bustling neighbourhood offering housing diversity, a thriving high street along Hawkesbury Road with connections to Parramatta" and proposes six key outcomes which are likely to be achieved following the construction of connecting rail and light rail infrastructure.

The sixth proposed outcome seeks to limit future development with the aim of "respecting the world heritage of Parramatta Park". **Further stakeholder engagement is required to determine the best way to achieve this outcome and whether or not limiting height and scale is the most necessary way to achieve this outcome** – reviewing this section should have regard to international best practices for central parks in major centres from across the world.

Sub-precinct 4: Northmead Employment

The Strategy seeks to retain the Northmead Employment precinct for industrial purposes, identifying minimal opportunities for the public wayfinding and the improved public domain.

A future review of this area may be warranted following engagement with landowners around the delivery of these outcomes and consideration of any opportunities to intensify economic activity in this sub-precinct.

Sub-precinct 5: Northmead Residential

The Strategy identifies future opportunities to improve public amenity and access to green spaces. **These outcomes are supported.**

Sub-precinct 6: Northmead Enterprise

The Northmead Enterprise Sub-precinct should be excised from the strategy given its limited connection to the surrounding precinct and city-shaping infrastructure. The future of this precinct should be considered by City of Parramatta Council in partnership with DPIE and industry stakeholders and this process should have stronger regard to its proximity and connectivity to the Parramatta CBD.

The Property Council is not aware of an evidence-based justification for excluding opportunities for mixed-use development in this area and notes this may even be supported when consideration is given to the existing character of Church Street to the south of this precinct area. **The Property Council at this stage does not support plans for this precinct.**

Sub-precinct 7: Parramatta North

The Property Council appreciates the unique blend of Indigenous and colonial heritage, natural beauty, city-shaping infrastructure, and economic opportunities which span this the Parramatta North sub-precinct. The Property Council does not oppose the eight outcomes sought for this precinct provided they are carefully planned and engage relevant stakeholders at the earliest opportunity.

Regarding Parramatta North the draft strategy does not specifically identify Indigenous heritage, the relocation of Willow Grove and the role this precinct is likely to have as a drawcard for the region's visitor economy. These items should all be included within the key outcomes sought for the sub-precinct for final strategy and be supported by the appropriate actions.

4.0 Governance

The Strategy outlines a vision which is broadly shared by major stakeholders with an interest in this precinct. While our submission does seek some changes to its actions and outcomes, the largest challenge relates to its implementation.

We are recommending a governance structure, such as a City Deal, to provide all stakeholders with the confidence the Place Strategy and its supporting actions, investment and infrastructure will be delivered.

The Western Sydney City Deal brings all levels of government together to coordinate the unprecedented level of investment in the Western Sydney Airport and its supporting infrastructure. Collaboration, direction, and the breaking-down of administrative silos across various levels of government is critical to maximising the economic benefit of the government's investment and a similar set of challenges is present within the Westmead Precinct.

In setting up a governance framework to implement the strategy, we support a formal role for industry and key peak bodies to provide immediate feedback and better shape the activities of government to deliver on the objectives of the strategy.

5.0 Key Recommendations

The Draft Westmead Place Strategy provides a vision which broadly aligns with existing planning documents and the expectations of major stakeholders for the future of this precinct. In order to see this vision fully realised we make the following recommendations:

Recommendation 1: A governance structure, such as a City Deal, spanning various levels of government, government agencies and industry groups, be created ensure the Place Strategy's vision and supporting actions, investment and infrastructure will be delivered in a timely manner.

Recommendation 2: Plans to increase public open space be identified at the earliest opportunity to provide certainty to industry.

Recommendation 3: The NSW Government prepares a place-based integrated transport and traffic study to future rezoning, taking into account the indicative location(s) and capacity of a new public school announced for Westmead.

Recommendation 4: Further stakeholder engagement occur to determine the most suitable interface between Parramatta Park and surrounding urban renewal projects.

Recommendation 5: The Northmead Enterprise Sub-precinct be excised from the strategy given its limited connection to the surrounding precinct and city-shaping infrastructure.

Recommendation 6: The outcomes for the Parramatta North Sub-precinct to include Indigenous heritage, relocation of Willow Grove and the role of the precinct in supporting the region's visitor economy.

Recommendation 7: The Department of Planning Industry and Environment tests the feasibility of any future Special Infrastructure Contribution or similar mechanism against a variety of development types to ensure local and state levies do not undermine feasibility.

Appendix 1: Property Council response to specific directions and actions

Directions and Actions	Property Council response
Connectivity <u>Direction 1 – Evolve Westmead to be a truly connected 30-minute city by leveraging new transport connections and improving existing networks within the Precinct, GOP and neighbouring centres.</u> <i>Actions:</i> D1.A1 – Explore opportunities to improve bus connections south to Merrylands and Prairiewood. D1.A2 – Provide new river crossings to create enhanced connectivity throughout the Precinct across Toongabbie Creek and Parramatta River. D1.A3 – Explore opportunities to create new road connections throughout the Heath and Innovation sub-precinct and Parramatta North with a focus on establishing clear sightlines within the Precinct, D1.A4 – Investigate road network hierarchy with the objective of identifying the prioritised mode of usage. Explore a ring road for vehicle movement within the Health Enterprise sub-precinct. D1.A5 – Investigate opportunity for station at Westmead on new north-south mass transit/train links.	<p>The Property Council supports Direction 1 and the 5 associated actions. In particular, we are encouraged by the positive statements regarding improving accessibility within and into the Westmead precinct using various modes of transport.</p> <p>We note that City of Parramatta Council in its submission has identified the lack of a place-based integrated transport and traffic study to support future rezoning. The Property Council supports this position, provided the study takes into account the indicative location of a new public school for Westmead (as announced by the NSW Government in the 2018/19 Budget) in the preparation of any future modelling.</p>
<u>Direction 2 – Encourage initiatives towards a safe walking and cycling city that is centred on pedestrian and cycleway connections that link to wider regional networks and surrounding places of interest.</u> <i>Actions:</i> D2.A1 – Develop a Precinct-wide public domain plan with a focus on -corridor widths, active frontages, wayfinding, pedestrian safety and amenity, passive surveillance, durability and place identity, D2.A2 – Improve connections between North and South Westmead by enhancing existing and consider new rail crossings. Explore the function of these rail crossings for active transport to create one connected green grid, D2.A3 – New development alongside Toongabbie Creek and Parramatta River is to encourage wayfinding, access and passive surveillance to existing walks along the waterways, D2.A4 – Develop a multi-modal interchange access plan to improve pedestrian movement and travel journey,	<p>The Property Council supports Direction 2 and the 5 associated actions, In particular, the initiatives aimed at better access to the multi-model interchange which should allow for seamless movement between the Precinct's key transport modes for users and provide support that encourages the take up of active transport modes such as walking and cycling.</p> <p>With a new metro station, Westmead Light Rail stop, bus transitway interchange and three major road intersections in close proximity a pedestrian and vehicular management strategy at the heart of Westmead needs to occur as an immediate priority.</p> <p>The City of Parramatta Council's submission seeks amendments providing for shorter timeframes to achieve Actions D1.A2 and D2.A4 to in order to promote walkability as the first priority. This approach is supported.</p>

D2.A5 – Prepare a place based integrated transport and traffic study to support future rezonings.	
<p><u>Direction 3 – Enable Westmead to be a smart city incorporating cutting edge technologies and digital collaboration to meet the day to day needs of the community.</u></p> <p><i>Actions:</i></p> <p>D3.A1 – Prepare a smart cities strategy for the Precinct which identifies opportunities for the provisions of infrastructure including but not limited to:</p> <ul style="list-style-type: none"> - Driverless and airborne vehicles, - Automated wayfinding - Pedestrian movement - Lighting - CCTV - Solar energy and - 5G wireless public connections. <p>D3.A2 – Investigate and develop innovative funding mechanisms for the delivery of smart city infrastructure identified in the Strategy.</p>	<p>The Property Council supports the preparation of a smart city strategy. We look forward to participating in discussions regarding funding mechanisms for smart cities, although we are mindful of the role of increased costs, taxes, fees and charges in making housing less affordable across Sydney.</p>
<p><u>Direction 4 – Foster a strong collaborative relationship and pride between government, local community, industry and investors to collectively deliver the Westmead vision.</u></p> <p><i>Actions:</i></p> <p>D4.A1 – Public exhibition of the Place Strategy including sub-precinct plans for local and state government, community and industry feedback,</p> <p>D4.A2 – Consider community and stakeholder feedback when finalising the Westmead Place Strategy,</p> <p>D4.A3 – Implementation of the Directions and Actions of the Westmead Place Strategy with the Preparation of relevant studies, masterplans, planning proposals and development applications to revitalise Westmead by 2036.</p>	<p>The Property Council supports Direction 4 and the 3 associated actions. As mentioned previously within this submission, a governance structure, such as a City Deal, is required to give all stakeholders confidence the Place Strategy and its supporting actions, investment and infrastructure will be delivered.</p>

Productivity	
<p><u>Direction 5 – Protect and enhance existing employment areas with a focus on job creation to transform the existing health and education precinct into the Westmead Health and Innovation District.</u></p> <p><i>Actions:</i></p> <p>D5.A1 – Review land uses within Westmead East and Former Cumberland Hospital Precinct to incorporate research and education uses,</p> <p>D5.A2 – Prepare an economic development strategy that outlines the priorities for delivering an innovation ecosystem, a diversity of employment uses and jobs, and development of new industries from world- leading research,</p> <p>D5.A3 – Provide amenity-led development that maximises access to waterways, open spaces and places of activity,</p>	<p>The Property Council supports Direction 5 and the 3 associated actions. We support the development of an economic development strategy for the Precinct that is focused on employment generation, economic growth and incentives to encourage investment in innovation and health-related research.</p>
<p><u>Direction 6 – Intensify commercial and retail uses around transport nodes to provide a more productive economy.</u></p> <p><i>Actions:</i></p> <p>D6.A1 – Investigate the proposed land use mix within activity nodes with a focus on the public domain,</p> <p>D6.A2 – Explore opportunities to improve connections between:</p> <ul style="list-style-type: none"> - Westmead North (as the main employment hub) and - Cumberland East and Cumberland West. 	<p>The Property Council supports Direction 6 and the 2 associated actions. We support the strong focus on locating commercial and retail uses around existing and future transport nodes will support the economic and commercial viability of these nodes which will be necessary for a vibrant and thriving Precinct.</p>

Liveability	
<p><u>Direction 7 – Deliver a range of social infrastructure and services that support community diversity and wellbeing to enhance the appeal and competitiveness of Westmead.</u></p> <p><i>Actions:</i></p> <p>D7.A1 – Prepare an open space and social infrastructure needs assessment based on projected population growth and identify mechanisms for future funding,</p> <p>D7.A2 – Investigate opportunities for primary and secondary school needs, noting projected residential growth in Westmead South and Parramatta North.</p> <p>D7.A3 – Prepare a Special Infrastructure Contribution (SIC) or other regional infrastructure funding mechanism for GPOP, including Westmead, to assist in the provision of infrastructure through development contributions for a growing Precinct.</p> <p>D7.A4 – Investigate opportunities for shared-use and co-location of community facilities on Council-owned and State-owned assets.</p> <p>D7.A5 – Develop a public domain plan for Hawkesbury Road with a focus on – street trees, lighting, furniture and material palette.</p>	<p>The Property Council acknowledges Direction 7 and the 5 associated actions. We understand the need for essential social infrastructure to be delivered to within the Precinct and in particular space for recreation and new educational facilities are important. The concept of shared facilities and co-location of community facilities has considerable merit and must be considered.</p> <p>The proposed SIC or other mechanism to fund regional infrastructure must be balanced with the need to ensure the cumulative impact of levies and charges does not erode project/development feasibility. DPIE is encouraged to test feasibility of different development types to ensure local and State levies do not undermine feasibility.</p>
<p><u>Direction 8 – Encourage an array of housing choices that includes affordable options to meet the housing needs of the future community.</u></p> <p><i>Actions:</i></p> <p>D8.A1 – Engage with LAHC to identify housing intensification opportunities in Westmead South.</p> <p>D8.A2 – Undertake further studies for housing intensification within 800 metres of Westmead Station and in proximity to open space amenity, to provide options for student accommodation, key worker, social and affordable housing.</p> <p>D8.A3 – Undertake urban design and supporting studies to understand the scale of future housing renewal, ensuring it respects solar access, views and vistas to open spaces and places of significance. Urban renewal must consider potential for heritage significance and character.</p> <p>D8.A4 – Explore opportunities for site amalgamation in Westmead South, in particular around Sydney Smith Park to increase exposure and accessibility,</p> <p>D8.A5 – Undertake a study to determine the feasibility and incentive mechanisms for key worker, social and/or affordable housing.</p>	<p>The Property Council acknowledges Direction 8 and the 5 associated actions. We support exploring potential for intensification of housing within 800 metres of Westmead Station, including a mix of market, affordable and social housing that is consistent with community needs.</p>

<p><u>Direction 9 – Develop opportunities to celebrate and reinforce Westmead’s history and culture with the protection of heritage places, inclusion of cultural and social spaces and enhancement of significant view corridors.</u></p> <p><i>Actions:</i></p> <p>D9.A1 – Prepare a place brand strategy to communicate Westmead’s identity,</p> <p>D9.A2 – Ensure development and planning proposals identified within activation areas and nodes create a unique sense of place and contribute to a high quality public domain, with consideration to Government Architect’s ‘Designing with Country’,</p> <p>D9.A3 – Prepare an activation and events program the brings together councils, key stakeholders, industry partners and community groups to raise the profile of Westmead,</p> <p>D9.A4 – Prepare a built form strategy that considers visual impact to heritage view corridors,</p> <p>D9.A5 – Review planning controls to provide foundations of growth for Westmead’s nightlife into the future including – provision of an 18-hour night-time economy, review of hours of operation for uses, identification of new activation areas, new cultural precincts, cultural and entertainment focus to be allowed additional hours for performance and activity.</p>	<p>The Property Council generally supports Direction 9 and the 5 associated actions. We support the protection of significant heritage and the adaptive reuse of identified places and buildings.</p>
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Sustainability	
<p><u>Direction 10 – Expand the urban tree canopy and create active and connected places that integrate with green infrastructure including neighbouring waterways and parklands for the enjoyment of the community</u></p> <p><i>Actions:</i></p> <p>D10.A1 – Develop a precinct-wide open space strategy and identify opportunities to improve existing parks, connect cultural spaces, historic sites and key places with consideration to Government Architect NSW <i>'Draft Greener Places Design Guide'</i>.</p> <p>D10.A2 – Deliver a range of diverse, new and/or enhanced open spaces, parks, playgrounds to support social connections through localised place-based planning, with consideration to Government Architect NSW <i>'Draft Greener Places Design Guide'</i>.</p> <p>D10.A3 – Provide new pedestrian crossings across Toongabbie Creek and Parramatta River to create enhanced connectivity throughout the precinct.</p> <p>D10.A4 – Prepare a precinct-wide urban tree canopy and streetscape plan which increases tree canopy cover, and improves the amenity of streets and open space, with consideration to Government Architect NSW <i>'Draft Greener Places Design Guide'</i>.</p>	<p>The Property Council supports Direction 10 and the 4 associated actions. In particular, it is important that the Precinct is provided with an adequate level of open space and parkland to ensure that the recreational needs of the future community that the Precinct will support can be met.</p> <p>We look forward to the development of the open space strategy identified in Action D10.A1 and to the opportunity to provide feedback during the consultation phase. Any land needed to be acquired for new or expanded areas of open space should be identified for acquisition by the relevant acquisition authority as early as possible.</p> <p>Given the low extent of existing tree canopy in the parts of the Central River City, we support Action D10.A4 to expand the urban tree canopy within the Precinct. It is important that the Urban Tree Canopy and Streetscape Plan is subject to wide consultation to ensure that the new tree planning is appropriate and does not cause conflicts with other infrastructure.</p>
<p><u>Direction 11 – Encourage best practice sustainability measures in every planning and design decision to promote a low carbon, low resource, and low waste precinct.</u></p> <p><i>Actions:</i></p> <p>D11.A1 – Engage all levels of government and private sector to identify a resource recovery and recycling strategy,</p> <p>D11.A2 – Develop initiatives for water, waste and energy efficiencies that consider the reduction of carbon emissions.</p>	<p>The Property Council supports Direction 11 and the 2 associated actions. In this regard we welcome the intention to identify a resource recovery and recycling strategy for the Precinct. This should be informed by standard industry practice for comparable precincts and all requirements should be easily understood so that compliance costs can be determined during the development process.</p>

<p><u>Direction 12 – Promote a precinct that is resilient and responsive to future climate condition.</u></p> <p><i>Actions:</i></p> <p>D12.A1 – Prepare an infrastructure resilience assessment and study that provides recommendations to implement the Resilient Sydney Strategy in Westmead,</p> <p>D12.A2 – Undertake a Precinct-wide emergency planning and prepare recovery interventions,</p> <p>D12.A3 – Undertake Precinct-wide planning for the various flood events and address through local planning.</p> <p>D12.A4 – Develop strong partnerships between public and private sectors and communities to establish a proactive stance on resilience.</p>	<p>The Property Council supports Direction 12 and the 4 associated actions. In this regard any obligations that will apply to a developer during the planning application phase should be readily identified and any costs to be incurred can be calculated.</p>
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Community Housing Industry
Association NSW

Submission on draft Westmead Place Strategy

February 2021

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About this submission

This submission is made by the Community Housing Industry Association NSW (CHIA NSW) in response to the draft Westmead Place Strategy, released by the NSW Department of Planning, Industry and Environment (DPIE).

CHIA NSW is generally supportive of the draft Strategy and welcomes its recognition of how vital diverse and affordable housing is to the successful transformation of Westmead. However, as we outline in this submission, further work is needed to fully consider how adequate social and affordable housing will be secured in the precinct.

The recommendations outlined in this submission can also be applied to the broader strategic planning work being undertaken for the Greater Parramatta and Olympic Peninsula (GPOP) area, including the preparation of a new Strategic Plan and Special Infrastructure Contribution.

CHIA NSW welcomes the opportunity to discuss our recommendations with DPIE in more detail.

About CHIA NSW

CHIA NSW is the industry peak body for registered, not-for-profit community housing providers in NSW. The community housing sector builds and provides low-cost housing for individuals and families who cannot afford to rent or buy a home in the private market. CHIA NSW represents 94 community housing providers (CHPs) delivering rental housing for very low to moderate income and disadvantaged households across NSW.

CHIA NSW's work is focused on four key areas:

- **Supporting sector growth**, through policy, research, advocacy, communications and stakeholder engagement with government, politicians, and partners.
- **Promoting service excellence and continuous improvement**, through benchmarking surveys, data collection, resources, and toolkits.
- **Equipping current and future leaders and staff in the community housing sector** through the delivery of accredited education and training, professional development, and events which connect our leaders and staff to share experiences, challenges, and best practice.
- **Supporting the establishment of the Aboriginal Community Housing Industry Association.**

The community housing industry in NSW is growing and diversifying. It now manages more than 50,000 homes across NSW. Between 2012 and 2020, CHIA NSW estimates that its members have invested more than \$1 billion to deliver around 3,200 new homes.

Community housing in the Central City

CHPs are part of the social and economic fabric of the Central City, managing approximately 2,931 homes in the area¹. Affordable housing provided by CHPs will be used to house people in low to moderate income jobs that are essential to supporting the economy, including health and childcare workers, retail and hospitality staff, and other essential service workers.

¹ CHIA NSW data, as of 30 June 2019. Blacktown, Cumberland, City of Parramatta and The Hills local government areas.

Collectively, CHPs have invested over \$191 million to deliver more than 538 homes in the Central City District², much of this within the City of Parramatta and Cumberland local government areas (LGAs). However, direct investment by CHPs alone cannot meet current and future housing needs.

Social and affordable rental housing supply is not keeping pace with population growth or demand. Across Cumberland and City of Parramatta LGAs, almost 30,000 households (approx. 20% of all households) are experiencing rental stress³. This is higher than the Central City District average of 11.6% of households⁴. Cumberland City Council has identified the need for 10,700 new affordable homes by 2036 (equivalent to approximately 37% of its target total housing supply)⁵, while the City of Parramatta has adopted a target of 8,790 additional affordable homes by 2036 (representing 10% of total housing supply)⁶.

CHIA NSW response to the draft Strategy

CHIA NSW welcomes the draft Strategy's recognition of the importance of delivering high quality and diverse housing for students, workers and professionals; which is identified as one of five "big moves" necessary to achieve the vision for Westmead as a health and innovation district.

Given the nature of land uses envisaged for the health and innovation district, it is likely to generate a concentration of low to moderate income jobs, including health, education, research, and retail workers. As such, the delivery of adequate social and affordable rental housing is essential to the successful transformation of Westmead and will support achievement of many of the draft Strategy's connectivity, productivity, and liveability objectives.

In this regard, we support the inclusion of Planning Direction 8 to "*Encourage an array of housing choices that includes affordable options to meet the housing needs of the future community*" and its associated planning priorities and actions.

However, to be effective, the draft Strategy needs to move beyond merely "encouraging" good housing outcomes. As recent research has highlighted, social and affordable housing outcomes in growth areas are only likely to be achieved when effective statutory planning policies and funding programs are in place to support it⁷.

The need for an overarching housing strategy

We note that the draft Strategy commits to undertaking further studies to determine opportunities and feasible mechanisms for delivering key worker, social and affordable housing in the precinct (Actions D8.A2 and D8.A5). It is critical that this work is completed before the finalisation of the draft

² CHIA NSW data, as of December 2020. Investment total includes both equity and debt finance. Total homes delivered includes social and affordable housing, retirement units and market housing.

³ Data derived from Cumberland Local Housing Strategy 2020 and City of Parramatta Local Housing Strategy 2020.

⁴ City of Parramatta Local Housing Strategy 2020.

⁵ Based on data from Cumberland Affordable Housing Strategy 2020, using total housing need forecasted in Cumberland Local Housing Strategy 2020. While Cumberland City Council anticipates 60% of this need to be met through secondary dwellings and dual occupancies supplied through the private rental market, CHIA NSW notes that this form of development cannot be guaranteed to be affordable to households on low to moderate incomes.

⁶ City of Parramatta Local Housing Strategy 2020.

⁷ Pill, M., Gilbert, G., Gurran, N. and Phibbs, P. (2020) *Strategic planning, 'city-deals' and affordable housing*, AHURI Final Report No. 331, Australian Housing and Urban Research Institute Limited, Melbourne, <https://www.ahuri.edu.au/research/final-reports/331>, doi: 10.18408/ahuri-7320301.

Strategy to ensure future rezoning proposals and development applications maximise opportunities for social and affordable housing provision.

The finalisation of the Strategy needs to be informed by an understanding of the full range of housing needs for the area, that considers:

- The types of jobs to be generated in the health and innovation precinct, in particular the number of low to moderate income workers.
- How much these workers can affordably spend on housing costs.
- Residents of existing social and affordable housing that may need to be rehoused as a result of renewal or intensification of existing LAHC sites.
- Low to moderate income households that may be priced-out as a result of increased land and property values arising from the forecast investment and development.
- Existing social and affordable housing supply that will not be displaced during the transformation of Westmead.
- The number of targeted affordable or lower cost housing options required as part of future development.
- Appropriate locations for new social and affordable housing supply in the precinct.

Consideration then needs to be given to the range of mechanisms that will be used to ensure delivery of the required affordable housing supply. These measures could include:

- Use of land owned by all levels of government, including renewal / intensification of existing social housing sites.
- Government funding and subsidies to support delivery.
- Planning mechanisms, such as inclusionary zoning requirements, development contributions, and incentives such as density bonuses or reduced car parking requirements in exchange for additional affordable housing provision.

We note that alongside finalising the Westmead Place Strategy, the NSW Government intends to prepare a new Strategic Plan for the broader Greater Parramatta and Olympic Peninsula (GPOP) area. The GPOP Strategic Plan will include a staging plan for precincts and further consideration of growth options and infrastructure needs. CHIA NSW recommends that the process for considering housing needs we have outlined above be incorporated into the broader GPOP strategic planning, so that the need for and costs of providing social and affordable housing are considered up-front, at the same time as the needs for other critical infrastructure are considered.

Such an approach will enhance the place-based approach to infrastructure planning and provide the opportunity to most efficiently and equitably deliver the sub-market housing needed to support the GPOP area. It will:

- Enable a strategic approach that considers opportunities and cumulative impacts across a broader area, instead of waiting for the precinct planning stage, which tends to have a narrower focus on impacts and outcomes.
- Result in more informed cost-benefit analysis and more informed decisions around sequencing of precincts and the coordination of delivery.
- Enable a fuller consideration of funding needs that accounts for the various mechanisms through which social and affordable housing will be delivered. This could help determine what affordable housing contributions may need to be recovered through the SIC as well as inform decisions over the use of government-owned land.

Such an approach will also assist in maximising the forward notice that can be given to landowners and developers of social and affordable housing requirements that may be imposed on development, thereby supporting development feasibility for private developers.

Affordable housing targets

The finalised Strategy should identify requirements for affordable housing to be provided as part of new development in the precinct. This will provide a consistent basis for securing affordable housing on sites benefiting from uplift in development potential as a result of changes to planning controls.

While we accept that a lower affordable rental housing target may be necessary in the initial years of the precinct's transformation, given development feasibility constraints, a higher target is likely to be supported in the future if sufficient notice is provided to the market. As such, a strategic, long-term approach to implementing affordable housing requirements should be adopted. This approach would involve increasing the affordable rental housing target over time. The Strategy should outline a timeframe or development yield threshold for when the higher affordable housing requirements will commence.

Internationally, as well as in the City of Sydney, it has been demonstrated that a broad-based contribution requirement does not impede development, as developers incorporate the contribution into the land purchase price⁸. Flagging future, higher, affordable housing requirements up-front will provide advance notice to the market, enabling these higher rates to be factored into future land cost expectations, thereby supporting the viability of increasing rates of affordable housing provision over time.

Regardless of the level at which the affordable housing requirement is set, the Strategy needs to provide clear guidance for how requirements should be applied to different forms of development. To maximise provision, it is recommended that:

- Affordable housing be required to be provided as part of any development incorporating residential floor space, whether it is for mixed-use or stand-alone residential accommodation.
- Employment-generating development be required to provide a monetary contribution towards affordable housing, given that such development in the precinct is expected to directly generate a need for affordable housing.
- A consistent basis for calculating the minimum affordable housing requirement should be established, to ensure requirements are consistently applied. We recommend the target is applied to the total development floor space of a development. An appropriate mechanism is also needed to enable the requirement to be met through a monetary contribution, in instances where on-site provision is not possible (for example, on sites where the contribution would represent less than a single dwelling).
- Clear criteria for considering applications that propose a reduced rate of affordable housing need to be developed – including requiring submission of detailed feasibility testing that justifies the need for a variation.

⁸ Gurrán, N., Gilbert, C., Gibb, K., van den Nouwelant, R., James, A. and Phibbs, P. (2018) *Supporting affordable housing supply: inclusionary planning in new and renewing communities*, AHURI Final Report No. 297, Australian Housing and Urban Research Institute Limited, Melbourne, <http://www.ahuri.edu.au/research/final-reports/297>, doi: 10.18408/ahuri-7313201.

- Consistent with the provisions of the *State Environmental Planning Policy (Affordable Rental Housing) 2009*, the Strategy needs to also be clear that affordable housing provided is to be managed by a registered community housing provider. Affordable housing should also be required to be provided in perpetuity, given the need for such housing will persist over the long-term.

Any shortfall in affordable housing that cannot be delivered through inclusionary zoning mechanisms will need to be delivered through other sources to close the housing gap, including via Government subsidy and the use of government-owned land for the purposes of affordable housing.

Use of government-owned land

CHIA NSW supports action D8.A1 of the draft Strategy to “*Engage LAHC to identify housing intensification opportunities in Westmead South, given the extent of landholdings in this area*”. Such an approach would be consistent with Strategy 11.2 of the Greater Sydney Region Plan. Any proposals that may involve the relocation of existing social housing residents into new homes must consider the need for people to retain valuable connections with the area they know.

We recommend that land owned by other government agencies also be investigated to identify additional opportunities for leveraging social and affordable housing outcomes. This could include ring-fencing parts of these sites for affordable housing development funded by contributions raised through inclusionary zoning mechanisms.

Proposed Special Infrastructure Contribution

The delivery of a range of social infrastructure and services is necessary to support community diversity and wellbeing. In this regard, CHIA NSW supports Direction 7 of the draft Strategy and its associated planning priorities and actions, including the intention to prepare a Special Infrastructure Contribution (SIC) to support the provision of necessary social infrastructure (Action D7.A3). We note that the NSW Government has indicated that this SIC will apply across the whole Greater Parramatta and Olympic Peninsula (GPOP) area, in which Westmead is located.

CHIA NSW encourages the inclusion within the SIC of contributions towards the funding of social and affordable housing, recognising that alongside transport, green space and community facilities, social and affordable housing is essential infrastructure, as it is needed to house people in lower paid jobs that are essential to supporting productivity and liveability across the GPOP area.

Affordable housing contributions are an established mechanism in the planning system in Sydney and internationally for securing affordable housing required for the workforce in an area. Contributions can be co-invested with lower-cost finance CHPs are able to obtain through the National Housing Finance and Investment Corporation (NHFIC), enhancing the effectiveness of affordable housing contributions to increase supply.

The degree to which the SIC should contribute towards the provision of affordable housing should be determined following consideration of the extent to which other mechanisms, including inclusionary zoning provisions, can deliver the quantum of lower-cost housing needed across the GPOP.

Contributions could be levied on development that will generate a need for social and affordable housing and to which an affordable rental housing target is not applied, such as employment uses that will create low to medium wage jobs.

While we recognise there is a limit to the total amount of infrastructure contributions that can be feasibly borne by development in an area, particularly in the initial years of implementation, affordable housing should not be given secondary priority to other infrastructure when considering the feasibility of the SIC. Where there are feasibility concerns, the SIC could include an allowance for a discount on the contribution rate during the initial years to provide the market time to adjust. Alternatively, the SIC could identify explicit timeframes for the introduction of affordable housing contributions in the future, in order to provide advanced notice to landowners and developers.

Developers in Sydney have consistently indicated willingness to deliver affordable housing or make a monetary contribution towards it when provided with sufficient notice and details of the contribution, including the approach to calculating the amount, timing, and form of the contribution.

At the very least, we would recommend the SIC includes a provision which identifies an explicit timeframe for its review to consider whether affordable housing contributions have become feasible for inclusion.

CHIA NSW also recommends that affordable housing development be exempt from payment of the SIC, as is common with other infrastructure contribution schemes. This will support the viability of delivering sub-market housing across the GPOP area.

A collaborative City

We support Direction 4 of the draft Strategy, which recognises the need for government, the local community, industry, and investors to collectively deliver the Westmead vision. This collaboration should extend to the not-for-profit sector, including community housing providers.

CHPs are well placed to work with all three levels of government to deliver social and affordable housing outcomes. CHPs can maximise the impact of government investment in social and affordable housing by leveraging their development capacity and significant financial benefits, including lower cost finance available through the NHFIC. In this way CHPs can work to unlock development opportunities.

We recommend that a community panel or community advisory group be established to facilitate the collaborative approach envisaged by the draft Strategy. The panel could include representation from non-government organisations that play a significant role in supporting communities, including CHPs, and feed into the finalisation of the Strategy and consideration of future masterplans, rezoning proposals, and development applications.

The further studies to be prepared to identify mechanisms for delivering key worker, social and affordable housing should also set out the collective roles and responsibilities of each level of government, and their partners, to deliver on the identified housing needs.

Jobs and skills for the City

CHIA NSW supports the draft Strategy's focus on job creation (Direction 5). As part of the finalisation of the Strategy and its implementation, including the preparation of an economic development strategy (Action D5.A2), consideration needs to be given to opportunities to connect existing disadvantaged communities to the jobs being created. This includes through the provision of training schemes, apprenticeships, and other initiatives to help local communities access jobs.

Linking existing communities to targeted employment and training opportunities would provide a highly needed circuit breaker for the locational disadvantage experienced by some social housing communities in Western Sydney.

Sustainability

CHIA NSW supports the draft Strategy's intention to encourage best practice sustainability measures to promote a low carbon, low resource, and low waste precinct (Direction 11). Ensuring good quality housing that is comfortable and safe during extreme weather, and affordable to operate, will assist low and moderate income households to adapt to the climate in this area.

Summary of recommendations

- The transformation of Westmead needs to be informed by an overarching housing strategy that identifies the full range of mechanisms that will be used, including affordable rental housing targets/contributions, to deliver the social and affordable housing needed to support productivity and liveability. This should include exploring the potential use of government-owned land to leverage social and affordable housing outcomes. Ideally, this work should be incorporated into the place-based infrastructure planning work undertaken as part of the development of the GPOP Strategic Plan.
- The Place Strategy should identify a minimum affordable rental housing target to be met by future development in the precinct. A strategic, long-term approach should be adopted, that steps up the affordable housing requirement over time, in line with expected improvements in development feasibility.
- Inclusionary zoning requirements should apply to all development incorporating residential floor space, or generating low to moderate income jobs, to support essential workers. An appropriate mechanism is needed to enable the affordable housing requirement to be met through a monetary contribution, in instances where on-site provision is not feasible.
- Clear guidelines should be established for how requirements will be calculated. Proposed reductions to the affordable housing requirement should not be permitted. At the very least, the Strategy needs to include clear criteria for how proposed variations will be assessed, including a requirement for detailed feasibility testing.
- The Place Strategy needs to also be clear that any affordable housing provided is to be managed by a registered community housing provider and provided in perpetuity.
- As it is essential infrastructure, a portion of the proposed GPOP SIC should be used to fund social and affordable housing provision, to supplement any proposed inclusionary zoning mechanisms. A discount could be offered in the initial years of the SIC to address feasibility concerns. Alternatively, the SIC should identify a timeframe for the future introduction of an affordable housing contribution and/or an explicit timeframe for the review of the SIC and assessment of the feasibility of an affordable housing element. Development for the purposes of affordable housing should be exempt from the SIC.

- CHPs are well-placed to work with all levels of Government and the private sector to unlock development opportunities. A community panel or community advisory group should be established to facilitate the collaborative approach to delivering the Westmead health and innovation district.
- Consideration needs to be given to opportunities to connect existing disadvantaged communities to the jobs being created in the precinct, such as through training schemes or apprenticeships.



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8 February 2021

The Responsible Officer
The Department of Planning, Industry and Environment

Dear Madam/Sir

Re: The Draft Westmead Place Strategy (WPS) – Submission by the Deerubbin Local Aboriginal Land Council (DLALC).

Please find attached a submission to the draft WPS prepared for the DLALC by our town planning consultants, Design Collaborative Pty Ltd.

The DLALC is pleased to be able to provide this submission and looks forward to continuing to work closely with the NSW Ministers for Planning and Place, and Western Sydney on this important strategy.

We are very keen to progress our work in relation to our Parramatta Gaol site landholding. We would understand this site is the largest parcel of private land in the North Parramatta sub-precinct and we are eager to activate the whole of the site, in concert with the outcomes for the whole WPS as envisaged by the NSW Government.

Yours sincerely

Kevin Cavanagh

Chief Executive Officer

Deerubbin Local Aboriginal Land Council



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8 February 2021

Ref: 140415.17L

DPIE

Online submission

Dear Sir,

Draft Westmead Place Strategy – Submission on behalf of Deerubbin Local Aboriginal Land Council

We act on behalf of Deerubbin Local Aboriginal Land Council (LALC).

Deerubbin LALC owns land at North Parramatta comprising the former Parramatta Gaol and adjoining lands to the west at O'Connell Street, North Parramatta (see **Plan 1**) which are within the Draft Westmead Place Strategy precinct (see **Plan 2**).

Deerubbin LALC has requested that we review the Draft Westmead Place Strategy (the Draft Strategy) and make this submission on its behalf. We note that Deerubbin LALC has been involved in the initial discussions to assist with the formulation of the Draft Strategy. Our comments seek to clarify and reinforce those matters going forward to ensure integration of Deerubbin LALC's land with adjoining and surrounding development opportunities.

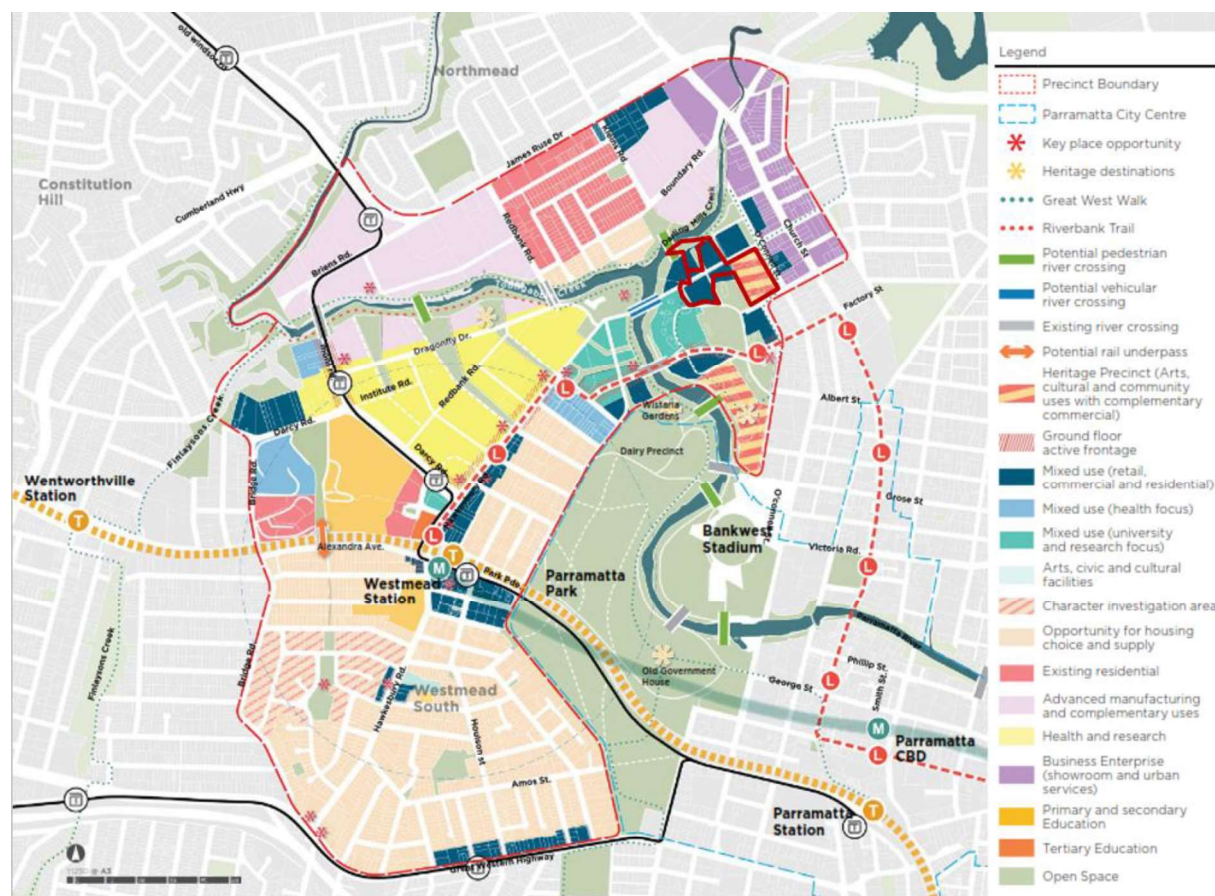
Deerubbin LALC's land occupies an area of 6.45 Ha and is situated on the western side of O'Connell Street with frontage to O'Connell Street and Dunlop Street. It also has frontage to Darling Mills Creek to the north. An access road to land occupied by the SES (owned by the State government) divides Deerubbin LALC's land into two irregular parts (see **Plan 1**).

Deerubbin LALC's land is in the north-western part of the Westmead precinct (see **Plan 2**) and forms part of Sub-precinct 7 – Parramatta North under the Draft Strategy.



Plan 1: Deerubbin LALC's Land at North Parramatta

Source: maps.six.nsw.gov.au



Plan 2: Westmead Place Strategy Map showing Deerubbin LALC's Land (edged dark red)

Source: Draft Westmead Place Strategy, p. 15

Comments on the Draft Strategy

In general, Deerubbin LALC supports the direction and initiatives of the Draft Strategy, both overall and as they relate to its land and the immediate surrounds within Sub-precinct 7. The directions and initiatives in the Draft Strategy are generally consistent with Deerubbin LALC's own objectives for its lands.

Deerubbin LALC has some concerns regarding the future development potential of land to the north-east of its land, within Sub-precinct 6 – Northmead Enterprise under the Draft Strategy.

These matters are addressed further below.

Land Use Designation of Deerubbin LALC's Land under the Draft Strategy

As shown in **Plan 2**, above, the Draft Strategy designates Deerubbin LALC's land as follows:

- Former Parramatta Gaol – *Heritage Precinct (Arts, cultural and community uses with complementary commercial)*; and
- Lands adjoining to the west of the Gaol site – the majority is designated *Mixed use (retail, commercial and residential)* with a small area of *Mixed use (university and research focus)* and *Open Space* along Darling Mills Creek, together with future road/access connections.

Deerubbin LALC supports the land use designations of its land under the Draft Strategy.

Deerubbin LALC's Vision for the former Parramatta Gaol site is:

To make Parramatta the key site for Cultural Curation of the community landscapes occupying the area from Aboriginal distant, Early Settler and immigrant past to Australia's future.

As part of its steps to achieve the Vision, Deerubbin LALC is in the process of preparing a development application for the use of the former Gaol site. The proposal is consistent with the above designation and comprises cultural, community and complementary commercial uses of the former Gaol site to facilitate its activation in a manner which recognises and respects its heritage significance.

In addition, a development application is in preparation for the use of an existing building within its adjoining lands to the west as an art gallery which is compatible with the Mixed Use designation of that land.

Deerubbin LALC also supports the Mixed Use designation of its lands to the west of the Gaol site as it provides the opportunity for a range of future development on that land. It will increase the development potential of that land compared with the existing situation and consistent with the wider precinct.

In this regard, it is noted that Deerubbin LALC's land (together with the adjoining Linen Service land to the north-east and SES-occupied land to the west) was excluded from the rezoning of the former Parramatta North Urban Transformation (PNUT) precinct under the SEPP Amendment (Parramatta North) 2015 which amended Parramatta LEP 2011.

The controls that currently apply to Deerubbin LALC's land, the adjoining SES land and the Linen Service land reflect historic circumstances and did not emerge from the strategic planning process for the adjoining PNUT. They allow only for minimal additional development on Deerubbin LALC's land, particularly when compared to adjoining land with similar characteristics and constraints.

'Big Moves'

Deerubbin LALC supports the 5 'Big Moves' identified in the Draft Strategy with Big Moves 2 and 3 having particular relevance to its land.

Big Move 2 and its related actions align with Deerubbin LALC's vision and objectives for culture and heritage on its lands, including the following relevant matters:

- *Cherish and protect places of significance, conserve and revitalise heritage and cultural assets to create exceptional places:*
 - *Connecting to Country - celebrate culture, build empowerment and allow for healing.*
 - *Respect and enhance the places of First Peoples and European cultural and heritage significance, particularly across Parramatta North.*
 - *Operate and curate museum, cultural and event programming, aligned with Parramatta Gaol, Riverside Theatre, Powerhouse Parramatta and other Parramatta and GPOP cultural and community planning initiatives.*
 - *Protect significant heritage view corridors.*
 - *Encourage opportunities to celebrate history in everyday experiences.*
 - *Encourage a geotechnical archaeological study to understand the pre 1788 landscape. (p. 11)*

In relation to the above, Deerubbin LALC has forged a partnership with the Powerhouse Museum which will enable the formulation of collaborative projects, exhibitions and programmes within and outside the Gaol. This relationship will support the above objectives and strengthen the connection between Parramatta North, Parramatta CBD and the Powerhouse site along the River spine and other transport linkages.

The partnership between Deerubbin LALC and the Powerhouse Museum also offers the opportunity for wider connections in the innovation sphere as it provides a direct connection between innovation fostered by the Powerhouse and the vision for the Westmead Precinct set out in the Draft Strategy as 'Australia's premier health and innovation district'.

Similarly, Big Move 3 and its related actions align with Deerubbin LALC's vision and objectives for increased activity, including night-time activity, and access and connections on its lands, including the following relevant matters:

- *Activate and connect our community with vibrant, diverse and well connected public spaces and places:*
 - *Target night time economy activities and prioritise upgrades to public spaces, including streets, which are vital to promoting inclusive social interaction and idea exchange.*
 - *Improve overall connectivity with active transport, wayfinding, pedestrian links and new river and rail crossings; and maximise access to waterways, open spaces and places of activity.*
 - *Protect and enhance expansive riparian, green space and environmental assets, including the river, increased tree canopy and foster sustainability outcomes for future generations.*
 - *Support day and night activation to create a vibrant and safe precincts.*
 - *Establish a connected public space green grid through the Heritage Spine from Parramatta Gaol extending through the Parramatta North Heritage Core and Parramatta River corridor; Stadium Precinct and then through to the new Powerhouse Precinct in Parramatta CBD. (p. 12)*

Deerubbin LALC also supports Big Move 1, focusing on driving economic development in the Precinct particularly in the health and innovation sectors as noted above, and Big Move 4, focusing on the delivery of housing for students, workers and professionals.

Draft Strategy Directions

Deerubbin LALC supports the following Draft Strategy Directions, and the related objectives, planning priorities and actions, which are relevant to the future use and development of its lands:

Direction 2 - *Encourage initiatives towards a safe walking and cycling city that is centred on pedestrian and cycleway connections that link to wider regional networks and surrounding places of interest.*

Direction 4 - *Foster a strong collaborative relationship and pride between government, local community, industry and investors to collectively deliver the Westmead vision.*

Direction 5 - *Protect and enhance existing employment areas with a focus on job creation to transform the existing health and education precinct into the Westmead Health and Innovation District.*

Direction 7 - *Deliver a range of social infrastructure and services that support community diversity and wellbeing to enhance the appeal and competitiveness of Westmead.*

Direction 8 - *Encourage an array of housing choices that include affordable options to meet the housing needs of the future community.*

Direction 9 - *Develop opportunities to celebrate and reinforce Westmead's history and culture with the protection of heritage places, inclusion of cultural and social spaces and enhancement.*

In particular, Deerubbin LALC supports priorities and actions directed towards:

- the formulation of appropriate building envelope controls for urban renewal to facilitate the redevelopment of its land for mixed uses in accordance with its designation (D4.A3, D5.A3, D7.P1, D8.A3);
- incentives for site amalgamation (D8.P3);
- adaptive re-use of heritage buildings (D7.P1, D9.P1, D9.P4); and
- day and night activation initiatives (D9.P5, D9.A3, D9.A5).

The controls formulated in accordance with the Draft Strategy should include appropriate incentives for the conservation and ongoing maintenance of the Gaol (recognising that the development potential of the Gaol land is limited by the existing development and its heritage significance). In particular, consideration should be given to a transfer of 'heritage floor space' from the Gaol land to the remaining land owned by Deerubbin LALC. The Draft Strategy should include the consideration of such mechanisms as one of its objectives and/or actions in support of Direction 9, in particular, as well as Big Move 2.

As noted above, Deerubbin LALC's land is currently bisected by an access road to the State government owned, SES-occupied, land. The lot boundaries are a reflection of the historical circumstances in existence at the time Deerubbin LALC was granted the land. Those boundaries constrain future development options for Deerubbin LALC's land as they split its land into two irregular parcels. Deerubbin LALC supports the development of mechanisms and incentives to address this situation and allow for the achievement of an integrated, holistic outcome for its land and the wider precinct in relation to design quality and preferred public domain/infrastructure alignments.



Plan 3: Sub-precinct 7 Proposals (with annotations)
Source: Draft Westmead Place Strategy, p. 65

Sub-precinct 7

As noted above, Deerubbin LALC's land is within Sub-precinct 7-Parramatta North under the Draft Strategy (see **Plan 3**).

Deerubbin LALC is supportive of the proposals for the Sub-precinct as noted above.

In particular, Deerubbin LALC supports the creation of connections (vehicular and pedestrian) to and from its land to the surrounding precinct and area. At the present time, Deerubbin LALC's land has limited road frontage which is a constraint on its development potential.

In this regard, Deerubbin LALC confirms its agreement to the extension of Dunlop Street to the west to provide for increased road access and services within the Sub-precinct and, in particular, to Deerubbin LALC's lands to the west of the Gaol (see **Plan 3**).

In addition, Deerubbin LALC supports the linkages and opportunity for interaction between its land and its future use and neighbouring land designated for university and research focus, including the new connections across the River. Deerubbin LALC is supportive of the University of Sydney's proposals within the Precinct and Sub-precinct and is directly engaged with it to achieve mutually beneficial outcomes. There is the opportunity for Deerubbin LALC's land to support the Draft Strategy's objectives for the creation of an innovation district through its relationships and connections with the University and the Powerhouse.

In addition to the connections shown in the Sub-precinct plan, Deerubbin LALC proposes a direct (pedestrian) connection between the Gaol site and its lands to the west (shown in **Plan 3**). This connection reflects Deerubbin LALC's current plans for the Gaol and aims to increase public access to the Gaol site and improve links to the wider Sub-precinct and the 'Heritage spine' via the public domain. This connection can be achieved in a manner consistent with heritage advice to minimise impact in the context of the heritage significance of the Gaol wall.

Sub-precinct 6

Deerubbin LALC's land adjoins Sub-precinct 6 – Northmead Enterprise to the north-east. That Sub-precinct is proposed to maintain its existing role as an employment area with a focus on supporting the provision of advanced manufacturing and maintaining urban services uses, together with limited 'amenity-led' mixed use development on the O'Connell Street frontage, including opposite the Gaol site (see **Plan 2**).

Deerubbin LALC seeks to ensure that proposals for Sub-precinct 6 in the vicinity of its land provide for an appropriate intensity of development, compatible with the character and amenity of the area and the heritage significance of the Gaol and other sites in the North Parramatta precinct. The current controls applicable to the adjoining area provide for an excessive level of development which would not be complementary to its surrounds, including the Gaol.

Implementation

Deerubbin LALC looks forward to continuing to work with the State government, Parramatta City Council and Sydney University to achieve the vision and outcomes of the Draft Strategy and its lands.

Summary

In summary, Deerubbin LALC is generally supportive of the Draft Strategy:

- it supports the land use designations of its land under the Draft Strategy and the additional development potential arising from the designation of its land to the west of the Gaol;
- it supports the 'Big Moves' and related actions as they align with Deerubbin LALC's vision and objectives for its lands particularly in relation to culture and heritage, increased activity, including night-time activity, and access and connections;
- it supports the Draft Strategy Directions, priorities and actions particularly those directed towards the formulation of appropriate building envelope controls for urban renewal, incentives for site amalgamation, adaptive re-use of heritage buildings and day and night activation initiatives. Formulation of building controls should include incentives for the conservation and ongoing maintenance of the Gaol through mechanisms such as transfer of 'heritage floor space'; and
- it supports proposals for Sub-precinct 7 with the addition of a direct connection to the Gaol site from the west.

Deerubbin LALC is concerned to ensure that proposals for Sub-precinct 6 in the vicinity of its land provide for an appropriate intensity of development, compatible with the character and amenity of the area and the heritage significance of the Gaol and other sites in the North Parramatta precinct.

As noted above, Deerubbin LALC looks forward to continuing to work with the State government, Parramatta City Council and Sydney University to achieve the vision and outcomes of the Draft Strategy and its lands.

Should you have any questions, please do not hesitate to contact the writer to discuss.

Yours Faithfully,
DESIGN COLLABORATIVE PTY LTD

A handwritten signature in black ink, appearing to read 'James Lidis', with a stylized flourish at the end.

James Lidis
Managing Director