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Our Ref	NCA/15/2024
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COUNCIL SUBMISSION TO REQUEST FOR ADVICE ON SYDNEY OLYMPIC PARK METRO STATION OVER & ADJACENT STATION DEVELOPMENT – AMENDING CONCEPT APPLICATION

I refer to the above request to provide advice on the State Significant Development Application (SSDA) for Sydney Olympic Park Metro Station Over & Adjacent Station Development – Amending Concept Application at 5-7 Figtree Drive, Sydney Olympic Park. Council has reviewed the supplied documentation and formally **OBJECTS** to the proposal, primarily on the grounds of loss of employment generating opportunities at a local and regional level.

Appendix 1 contains detailed comment on Council's objection to the proposal.

Should you wish to discuss the above matters, please contact Douglas Bennett, Senior Development Assessment Officer on the details listed above.

Yours sincerely

Jennifer Concato

Executive Director

CITY PLANNING & DESIGN

Appendix 1

Economic Impact

Council raises significant concern over adverse economic impacts associated with the proposal.

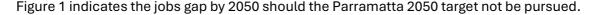
Impact on Sydney Olympic Park & City of Parramatta Employment Capacity

Parramatta plays a significant regional role in Greater Sydney, as the leading employment centre in Western Sydney and NSW's second major CBD.

Parramatta's population is expected to grow by 70% or approximately 140,000 people by 2041 (Source: .id), and the broader Western Sydney region is projected to grow by 712,000 people in that time period (Source: draft, Roadmap to 150,000 Jobs report, HillPDA). This scale of regional growth reinforces the importance of Parramatta's role in concentrating high-quality, accessible jobs to support Western Sydney.

As such, it is imperative that Parramatta's jobs growth across the LGA is commensurate with its population growth to ensure that the City continues to provide at least 1 job for every 1.5 people living in the City, and that it addresses Greater Sydney's jobs imbalance between east and west.

City of Parramatta's Global City Vision Parramatta 2050 sets a target for the Parramatta LGA of 150,000 new jobs by 2050 centred on its five Global Districts (including Sydney Olympic Park). Parramatta 2050 sets a clear vision for Sydney Olympic Park through the Key Move of 'Jobs Growth and Industry Specialisation' to become a hub for sports and sports science (along with other opportunities like business events, music and entertainment).



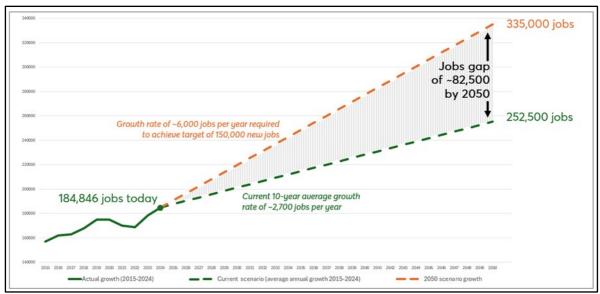


Figure 1 Identified Jobs Gap

Sydney Olympic Park today is one of City of Parramatta's significant employment centres, providing over 13,000 jobs (2021). As one of Global Parramatta's five districts, it plays an important role in the City's jobs growth, building on its reputation as the City's home of major cultural and sporting events with employment opportunities across a range of industry sectors.

The proposed development represents a significant loss in jobs capacity of approximately 1,661 jobs over the previously approved scheme (Table 1).

	Current Proposal	Previously approved	Variation (previous)
EMPLOYMENT USES			
Commercial GFA	1,183	27,841	-26,658
Commercial jobs	74	1,740	-1,666
Retail GFA	791	555	236
Retail jobs	16	11	5
Hotel GFA	N/A	N/A	N/A
Hotel jobs	N/A	N/A	N/A
Other non-resi GFA	N/A	N/A	N/A
TOTAL JOBS	90	1,751	-1,661
RESIDENTIAL USES			
BTS units	191	0	191
BTR units	0	0	0
Other units	0	0	0
TOTAL RESIDENTS	401	0	401

Notes:

- $\circ \quad \textit{GFA and dwelling figures derived from application documents}.$
- Job calculations derived utilising floorspace to worker ratios per City of Sydney's Floorspace and Employment Survey of 1 worker per 16sqm.
- o Resident/population calculations using average ratio of 2.1 people/dwelling at Wentworth Point.
- \circ N/A = Not Applicable.

Council therefore objects on the basis of loss of employment capacity at a local and regional level.

Sydney Olympic Park Master Plan 2050

Council also notes the proposal's inconsistency with the objectives and outcomes of the draft Sydney Olympic Park Master Plan 2050.

The draft Sydney Olympic Park Master Plan 2050 has not been finalised and City of Parramatta's submission and concerns with the draft Master Plan have yet to be satisfactorily addressed.

City of Parramatta in its submission expressed concerns relating to the excessive residential density and the shift to prioritise housing over employment opportunities, which limits Sydney Olympic Park's potential as an economic centre for Greater Sydney. City of Parramatta included in its submission several recommendations to address these concerns and grow jobs in Sydney Olympics Park.

Concern is raised over the prospect of determination of the subject amending application prior to the finalisation of the Sydney Olympic Park Master Plan 2050. Decisions impacting the provision of future jobs capacity at Sydney Olympic Park should not pre-empt an endorsed Sydney Olympic Park Master Plan 2050.

Notwithstanding, City of Parramatta's concerns with the draft Sydney Olympic Park Master Plan 2050, and its prioritisation of housing, Council acknowledges the Master Plan's target of up to 32,000 jobs by 2050 for Sydney Olympic Park as part of the vision for the precinct to contribute to Greater Sydney's jobs and economic growth. City of Parramatta reinforces its position that the Master Plan should not scale back the jobs target for the precinct.

Further, the draft Master Plan identifies the Urban Centre (in which the subject site is located) **as a major commercial and employment node supporting a higher concentration of jobs** to help achieve this target.

The previously approved scheme included a range of uses consistent with the vision for the Urban Centre, balancing residential uses with commercial and retail spaces. Specifically for the subject site (11 UC) the previously approved scheme was consistent with the 'land use schedule' setting a minimum 50% of non-residential GFA. The amending application does not meet this minimum.

The application is inconsistent with the objectives of the Master Plan's vision for the Urban Centre, proposing to delete a significant number of jobs which will hinder Sydney Olympic Park's ability to achieve the Master Plan's target of 32,000 jobs.

As such, the application would result in a lost opportunity for well-located commercial space adjacent to the Metro OSD in the heart of Sydney Olympic Park's Urban Centre. This outcome would be inconsistent with the vision of the draft Master Plan's and Use concept' to "Support a higher concentration of jobs within the Urban Centre adjacent to the future Sydney Olympic Park Metro station and existing railway station". The application negates the important role Metro West plays in supporting jobs growth in Greater Sydney and in unlocking access to new, well-located jobs in key employment centres.

Housing Targets & Strategic Planning

In addition to the matters outlined above, Council is already on track to meet its housing delivery benchmarks for the local government area, as set out by the Department of Planning, Housing, and Infrastructure. While the broader housing crisis is acknowledged, it does not justify the loss of employment-generating land or the associated reduction in economic productivity. The conversion of reserved commercial land to residential use—particularly through ad-hoc proposals such as this—risks undermining the city's strategic long-term employment capacity. If this trend continues, it will lead to a future imbalance between housing supply and job availability, which would compromise the sustainability of the city's growth.

Recommendations

Based on the above, Council makes the following recommendations in relation to the subject application.

- That the modification proposal is not supported on strategic grounds due to the following:
 - City of Parramatta's Global City Vision Parramatta 2050 sets a target for the Parramatta LGA of 150,000 new jobs by 2050 centred on its five Global Districts (including Sydney Olympic Park).
 - Parramatta 2050 sets a clear vision for Sydney Olympic Park through the Key Move of 'Jobs Growth and Industry Specialisation' to become a hub for sports and sports science (along with other opportunities like business events, music and entertainment)

- acknowledging Sydney Olympic Park's important role in Parramatta achieving its 2050 jobs target.
- The application sets an undesirable precedent for losing jobs potential at Sydney Olympic Park in the context of this vision for Parramatta to be a jobs centre for all of Sydney, and particularly for Western Sydney.
- That a decision on the application be deferred until such time as the Sydney Olympic Park Master Plan 2050 is finalised, to ensure that City of Parramatta's submission to the draft Sydney Olympic Park Master Plan can be considered and satisfactorily addressed, specifically:
 - Council's opposition to the draft Master Plan's increase in residential density and the shift to prioritise housing over employment opportunities, which limits Sydney Olympic Park's potential as an economic centre for Greater Sydney.
- That notwithstanding Recommendations 1 and 2, that the modification is not supported on the grounds that it does not align with the draft Sydney Olympic Park Master Plan 2050, specifically:
 - The 'Urban Centre schedule of land use, public open space and streets' (Table 4.1.1)
 which sets a minimum % of non-residential GFA for the subject site (11 UC) of 50%,
 which this modification does not meet.
 - The 'land use concept' (section 3.6.1) which sets an objective (objective f) to "Support a higher concentration of jobs within the Urban Centre adjacent to the future Sydney Olympic Park Metro station and existing railway station".
 - The 'commercial uses' (Section 3.6.2) which sets an objective (objective i) to "Support the intensification of commercial office uses within the Urban Centre, including potential over-station development".
 - o The 'commercial uses' (Section 3.6.2) controls which include that "Development on sites must provide a minimum amount of commercial uses in accordance with the Character Areas in Chapter 4 of Master Plan 2050".
 - The 'layout and land use' (Section 4.1.2) which sets an objective (objective a) to "Promote business, retail and office uses to reinforce the role of the Urban Centre as a major commercial and employment node".
- Regardless of land use mix proposed, an Economic Impact Statement must be completed.
 The EIS must:
 - Provide a clear breakdown of existing GFA and jobs associated with each land use component in the original approved proposals (DA or concept), and the subject amending proposal.
 - Assess and justify any difference in jobs numbers between the original and amending proposals, including long-term economic impacts to the City that might result.
 - o Provide a clear analysis of demand for retail and other population-serving uses generated by the amending proposal. This should include emphasis on the role of retail in developing a precinct that serves and reflects the scale of the proposal and population in-situ, regardless of eventual use. Any proposal should be justified in light of this analysis, ensuring the proposal responds to retail and population-serving demands.
- Any residential uses proposed must be future-proofed for potential future conversion to commercial uses through design and subdivision.