CRESCENT PARKLANDS SSD

Potential Offsets Against Section 7.11 Contributions

24 July 2026

Prepared for:
Tiberius (Holroyd) Pty Ltd

InfraGrowth PLANNING

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Executive Summary

Tiberius (Holroyd) Pty Ltd has requested advice regarding the potential for infrastructure delivered as part of the approved Crescent Parklands State Significant Development (SSD) to be recognised as offsets against section 7.11 local infrastructure contributions payable under the development consent. The approved development is subject to section 7.11 contribution obligations under Condition A13 of SSD-70283710. Based on the current contributions assessment, the contribution liability is approximately $21 million (plus indexation).

This advice assesses the offset potential of the capital component of five infrastructure items delivered as part of the approved development: (1) Central Park, (2) the Pedestrian and Cycle Bridge, (3) the Internal Road Network, (4) the Crescent Street / Woodville Road Intersection Upgrade, and (5) the Crescent Street Widening and Upgrade. No offset is sought for the land value component.

The assessment has been undertaken having regard to the Development Consent, Environmental Impact Statement, supporting technical studies, Cumberland Local Infrastructure Contributions Plan 2020 and relevant strategic planning documents.

Cumberland City Council did not support the original planning proposal for the site, which ultimately proceeded through a Rezoning Review process and was approved by the Minister's delegate. Consequently, there was limited opportunity to negotiate a planning agreement with Council during the rezoning process to address infrastructure delivery and funding arrangements, or for Council to amend its local infrastructure contributions plan to include any agreed public benefit infrastructure. The offset framework considered in this advice therefore provides an alternative mechanism to recognise the significant community infrastructure being delivered directly by the developer as part of the approved development.

Under section 7.13(2) of the EP&A Act, where the Minister or delegate is the consent authority—as is the case for State Significant Development—contributions need not be determined strictly in accordance with a contributions plan. The assessment therefore considers the extent to which each infrastructure item: (a) benefits the wider community; (b) responds to an identified infrastructure need; (c) aligns with adopted strategic planning documents; and (d) provides benefits beyond those required to facilitate the development.

The strongest case for offset recognition exists in relation to Central Park and the Pedestrian and Cycle Bridge, both of which provide substantial community benefits, respond to identified infrastructure needs, align strongly with Council's strategic planning framework and exhibit a high degree of additionality.

The Internal Road Network, Crescent Street / Woodville Road Intersection Upgrade and Crescent Street Widening and Upgrade exhibit a combination of community infrastructure and development-enabling characteristics. While each item supports the operation of the development, the available evidence indicates that they also provide broader community benefits through improved access, connectivity and transport network performance.

Overall, the assessment concludes that:

- Central Park and the Pedestrian and Cycle Bridge exhibit a very high offset potential
- the Internal Road Network exhibits a high offset potential
- the Crescent Street / Woodville Road Intersection Upgrade and Crescent Street Widening and Upgrade exhibit a medium offset potential.

The assessment is consistent with the discretion available to the consent authority under section 7.13(2) of the EP&A Act and provides an evidentiary basis for considering offset recognition having regard to the nature, value and public benefit of infrastructure delivered directly by the developer.

A summary of the assessment is provided in Figure 1 overleaf.

Figure 1: Summary of Offset Assessment

Infrastructure item	Community benefit	Infrastructure need	Strategic alignment	Additionality	Offset potential	Offset potential (% of capital cost)
Central Park	✓✓✓	✓✓✓	✓✓✓	✓✓✓	Very High	100%
Pedestrian & cycle bridge	✓✓✓	✓✓	✓✓	✓✓✓	Very High	100%
Internal road network	✓✓	✓✓	✓	✓	Medium	40-60%, say 50%
Intersection upgrade	✓✓	✓✓	✓	✓✓	High	50-70%, say 60%
Crescent Street widening	✓✓	✓✓	✓	✓✓	High	50-70%, say 60%

Note: Assessment ratings are qualitative indicators of the relative strength of alignment with each criterion.

✓✓✓ = Very high alignment

✓✓ = High alignment

✓ = Medium alignment

✗ = Little or no alignment

1. Background and Instructions

Tiberius (Holroyd) Pty Ltd has engaged InfraGrowth Planning to provide advice regarding the potential for infrastructure delivered as part of the approved Crescent Parklands State Significant Development (SSD) to be recognised as an offset against section 7.11 local infrastructure contributions payable under the development consent.

The Crescent Parklands development comprises a major mixed-use urban renewal project at Holroyd, incorporating residential development, affordable housing, publicly accessible open space, active transport infrastructure, public domain improvements and road network upgrades.

The approved development is subject to section 7.11 contribution obligations under Condition A13 of Development Consent SSD-70283710. This advice considers the extent to which key infrastructure items proposed to be delivered directly by the developer exhibit characteristics commonly associated with infrastructure that may reasonably be recognised as an offset against those contribution obligations.

Specifically, this advice assesses the following infrastructure items:

1. Central Park

2. Pedestrian and Cycle Bridge across A'Becketts Creek

3. Internal Road Network

4. Crescent Street / Woodville Road Intersection Upgrade

5. Crescent Street Widening and Upgrade

It is noted that Condition A20 of the Development Consent requires a monetary contribution of $102,000 to Council towards active transport connection and upgrade works between the site and Merrylands Station. This contribution is not considered as part of the current assessment.

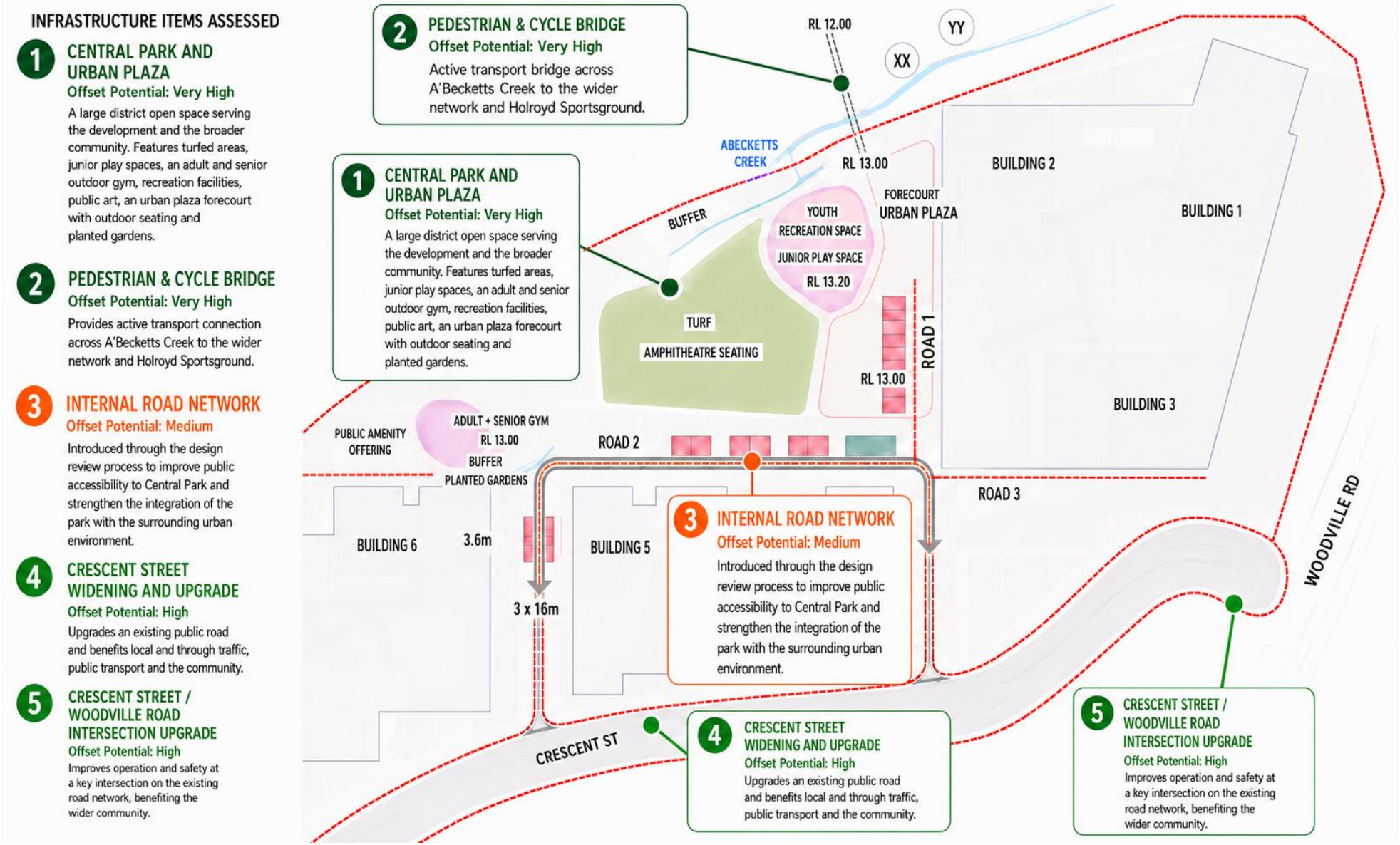
The assessment considers the planning purpose, function and beneficiaries of each infrastructure item having regard to the approved development, Environmental Impact Statement, Development Consent, supporting technical studies and relevant strategic planning documents.

The objective of the assessment is to determine the extent to which each item serves a broader community function and addresses infrastructure needs beyond those generated by the development itself, as distinct from infrastructure required primarily to facilitate or service the development.

A location plan and summary of the infrastructure items assessed in this advice are provided in Figure 2.

The following sections provide a detailed assessment of each infrastructure item and identify the factors relevant to its potential recognition as an offset against section 7.11 contribution obligations.

Figure 2: Crescent Parklands Master Plan and Infrastructure Items Assessed



2. Planning and Legislative Context

2.1 Development Contributions Framework

The purpose of section 7.11 contributions is to fund public amenities and services required as a consequence of development.

A fundamental principle underpinning contributions plans is that contributions should be reasonably apportioned to the infrastructure needs generated by development — and in practice, infrastructure that delivers broader community benefit presents a stronger case for offset recognition than infrastructure required solely to facilitate a particular development.

Accordingly, infrastructure that:

- serves a wider catchment
- addresses identified infrastructure needs
- delivers strategic outcomes
- provides community benefit beyond the development itself

generally presents a stronger case for offset recognition than infrastructure that primarily enables development.

2.2 Cumberland Local Infrastructure Contributions Plan

The Cumberland Local Infrastructure Contributions Plan identifies a range of infrastructure categories requiring funding, including:

- open space and recreation
- community facilities
- transport infrastructure
- public domain improvements.

The Plan also recognises alternative contribution delivery mechanisms, including works-in-kind and planning agreements.

2.3 State Significant Development Considerations

The Crescent Parklands project was approved as State Significant Development by the Minister for Planning and Public Spaces on 31 March 2026.

The SSD framework has important implications for the application of local infrastructure contributions. Under section 7.13(1) of the EP&A Act, where the consent authority is a council, any local infrastructure contribution condition must be imposed in accordance with a contributions plan applying to the land. However, under section 7.13(2), where the consent authority is the Minister or the Minister's delegate — as is the case for SSD applications — the condition may be a contribution that is not authorised by, or not determined in accordance with, a contributions plan, provided the consent authority has had regard to any contributions plan that applies to the land.

This distinction is significant. It means that while Cumberland City Council would be bound to impose the maximum monetary contribution prescribed under the Cumberland Local Infrastructure Contributions Plan, the Minister or delegate has discretion to impose a different form or quantum of contribution where the particular circumstances of the development warrant it. This discretion enables the consent authority to consider the nature, value and public benefit of infrastructure delivered directly by the developer when determining the appropriate contribution.

The approved consent reinforces this position by expressly including as components of the development:

- publicly accessible open space
- a pedestrian bridge over A'Becketts Creek
- publicly accessible through-site links
- Crescent Street widening works
- upgrades to the Crescent Street / Woodville Road intersection.

The consent therefore recognises that significant community infrastructure forms an integral component of the approved development.

The relevant question under the SSD framework is therefore not simply whether the infrastructure appears within Council's contributions plan, but whether the infrastructure — having regard to the purpose and intent of development contributions — delivers broader community outcomes consistent with those the contributions plan is designed to achieve. Where it does, the discretion available under section 7.13(2) provides a sound legislative basis for recognising that infrastructure as an offset against monetary contribution obligations.

2.4 Relevant SSD Precedents

A review was undertaken of recent State Significant Development (SSD) and State Significant Precinct (SSP) determinations to identify examples where developer-delivered infrastructure has been recognised in lieu of, or as an offset against, local infrastructure contribution requirements.

Examples include TOGA Central, Waterloo Estate (South), Blackwattle Bay and the Sydney Fish Market redevelopment, where publicly accessible open space, public domain, transport and community infrastructure were recognised as delivering infrastructure outcomes that would otherwise be funded through local infrastructure contributions. Details are summarised in the table below.

While each project was assessed on its individual merits and under its own statutory and planning framework, the review indicates that publicly accessible open space, public domain, transport infrastructure and community facilities have, in some circumstances, been recognised as alternatives to, or offsets against, monetary contribution obligations where they provide substantial public benefit and contribute towards broader infrastructure outcomes.

The precedents identified are not directly determinative of the Crescent Parklands project. However, they demonstrate that the assessment of infrastructure delivered as part of SSD projects may extend beyond a simple comparison against items listed in a contributions plan and can involve consideration of the nature of the infrastructure, the beneficiaries of the infrastructure and the extent of broader community benefit delivered.

Table 1: Relevant SSD and SSP Precedents

Project	Determination / Finalisation Date	Infrastructure Delivered	Outcome	Relevance to Crescent Parklands
TOGA Central	4 July 2024	Public domain improvements, pedestrian connections and publicly accessible open space	Developer-delivered public infrastructure recognised through offset arrangements	Demonstrates offset recognition of publicly accessible infrastructure that improves connectivity, accessibility and public amenity for the wider community.
Waterloo Estate (South)	11 November 2022	Public open space and community facilities	Offsets recognised through VPA arrangements	Demonstrates offset recognition of open space and community infrastructure that serves a broader catchment.
Blackwattle Bay	11 November 2022	Public open space, public domain, cycleway, roads and intersection works	Infrastructure recognised in lieu of local contributions	Demonstrates offset recognition for transport and public domain infrastructure providing broader public benefits.
University of Sydney Engineering & Technology Precinct	14 February 2019	Public domain works and open space improvements	Public domain works permitted in lieu of monetary contributions	Demonstrates recognition of developer-delivered public infrastructure in the SSD context.
Sydney Fish Market	12 June 2020	Public domain, foreshore promenade, pedestrian and cycle connections, road and intersection upgrades	Monetary contribution not required due to substantial public benefit	Demonstrates that significant publicly accessible infrastructure can be considered as an alternative to monetary contributions where broader community benefits are delivered.

3. Assessment Methodology

The assessment considers the extent to which each infrastructure item exhibits characteristics commonly associated with infrastructure that may reasonably be recognised as an offset against section 7.11 local infrastructure contributions.

The assessment has regard to four key criteria:

- **Community Benefit** – the extent to which the infrastructure provides benefits to the wider community beyond the development itself
- **Infrastructure Need** – the extent to which the infrastructure responds to an identified infrastructure need or deficiency
- **Strategic Alignment** – the extent to which the infrastructure is supported by adopted strategic planning documents, strategies or policies
- **Additionality** – the extent to which the infrastructure provides benefits or outcomes beyond those required to facilitate the development itself.

Each infrastructure item has been assessed against these criteria using a qualitative rating system. The ratings indicate the relative strength of alignment with each criterion and are not intended to represent a numerical score.

Rating	Alignment
✓✓✓	Very high
✓✓	High
✓	Medium
✗	Low or no alignment

The ratings inform an overall assessment of offset potential for each infrastructure item. Infrastructure demonstrating strong community benefit, responding to identified needs, aligning with strategic planning frameworks and exhibiting a high degree of additionality will generally attract greater offset recognition than infrastructure primarily required to facilitate the development itself.

Infrastructure items are assigned an overall offset potential ranging from Low/No to Very High , reflecting the relative strength of the case for offset recognition having regard to all assessment criteria. The assessment does not apply a weighted scoring system or formula — ratings serve as indicators to support professional planning judgement, having regard to the nature, function and beneficiaries of each item, the planning context and available supporting evidence.

4. Assessment of Infrastructure Items

4.1 Central Park

Existing Condition

The land on which Central Park is to be delivered is currently a vacant, cleared industrial site comprising largely continuous concrete hardstand and asphalt pavement left over from the former WesTrac heavy machinery operations that ceased in 2018. The site provides no public open space, no landscaping, no pedestrian amenity and no community benefit in its current form. It is inaccessible to the public, visually impermeable from the street, and entirely disconnected from the adjoining Holroyd Sportsground and A'Becketts Creek corridor.

The site contributes to the urban heat island effect through its expanse of exposed hardstand, and offers no ecological, recreational or social value to the Cumberland community. Photos of the existing site are shown at Appendix A.

Description

The approved development includes the delivery of a substantial publicly accessible open space asset (Central Park) as a key component of the Crescent Parklands masterplan. The park is intended to provide a range of recreational, social and community functions and will be available to both future residents of the development and the broader community.

Central Park has been designed and scaled well beyond the level of open space required to serve the development's own residents. Its size, mix of uses and quality of embellishment position it as a regionally significant destination, drawing visitors from across the wider Cumberland community rather than functioning solely as local resident amenity.

The park combines several integrated elements:

- A generous urban plaza forms the social heart of the space. The plaza is substantially larger than the area required to support the adjoining retail and dining tenancies, and functions as a public meeting place and gathering point and provides significant amenity to regional uses and visitors traversing from the Sports Ground. It is directly connected to, and activates, the surrounding children's play area.
- Activated children's areas include a dedicated kids' play area and a tricycle track, located adjacent to the plaza so that family recreation, dining and social activity are co-located and mutually supporting.
- Open green space provides turf areas for informal recreation, relaxation, community gathering, events and dog walking.

- Active recreation facilities include an outdoor adult and senior gym and walking routes through the park, supporting health and wellbeing for users of all ages.
- Public art is integrated throughout the park, contributing to its identity as a destination and enhancing its civic and cultural value.

The park is further connected to the wider open space network via a pedestrian and cycle bridge across A'Becketts Creek, providing a direct active transport link to the existing Holroyd Sportsground and the wider pedestrian and cycling network. This connection extends the park's catchment and reach, reinforcing its regional significance by linking it to established recreational infrastructure beyond the site.

Together these elements deliver an open space asset that materially exceeds what is required to support the development, creating a high-quality public destination for the broader community.

The proposed works extend beyond the provision of open space and include the remediation, preparation and embellishment of land to create a fully functioning public recreation asset. The works comprise:

- Demolition and removal of existing hardstand and site improvements
- Site remediation and enabling works, including contamination management in accordance with the approved Remediation Action Plan
- Bulk earthworks to establish the approved park landform
- Civil, drainage and water-sensitive urban design infrastructure
- Extension and augmentation of services required to support park operations
- Hard and soft landscaping works, including extensive tree planting, communal lawn areas and native landscaping
- A thematic children's play space incorporating Connecting with Country design principles
- Adult and senior-friendly outdoor fitness facilities
- BBQ, picnic and community gathering areas
- An urban forecourt and public domain spaces connected to surrounding pedestrian routes
- A network of accessible pedestrian pathways and shared movement corridors
- Lighting, irrigation, seating, wayfinding and associated park infrastructure
- Public art, cultural interpretation and Connecting with Country elements developed in consultation with local Indigenous knowledge holders.

Collectively, these works would transform a former industrial site into a significant publicly accessible recreation and community asset serving the Holroyd and Granville catchment and broader Cumberland community.

Retail tenancies, private open space areas and works forming part of the residential development are excluded from the offset works assessment.

Imagery of the infrastructure works are shown at Appendix B.

Assessment

Central Park represents the strongest candidate for offset recognition of all infrastructure items assessed.

The park would provide a significant publicly accessible open space asset serving both future residents and the wider Cumberland community. It would deliver opportunities for passive recreation, informal play, social interaction, walking, relaxation, community gathering and improved health and wellbeing outcomes. The park would significantly add to the Holroyd Sports Ground precinct, turning a very passive green space into an activated and regionally significant community asset.

Importantly, the park directly addresses an identified local infrastructure need.

The Cumberland Open Space and Recreation Strategy 2019–2029 identifies the delivery of additional open space and recreation facilities as a key strategic objective and recognises that increasing population growth and urban consolidation will place increasing pressure on existing open space resources. The Strategy specifically identifies the need to deliver new open space and recreation opportunities to support Cumberland's growing population and acknowledges existing gaps in open space provision across parts of the LGA.

The strategic justification for the park is further strengthened by updated population forecasts prepared for Cumberland City Council by .id (Informed Decisions). These forecasts indicate that the Granville small forecast area – which incorporates Holroyd and the subject site - is expected to experience population growth of approximately 40% between 2026 and 2046, significantly above the Cumberland-wide average growth rate of approximately 30.5%.

The subject site is therefore located within one of Cumberland's highest growth catchments, with population growth projected to significantly exceed the Cumberland-wide average over the next two decades. This growth will increase demand for publicly accessible open space, recreation opportunities and community gathering spaces.

The updated forecasts post-date both Council's Open Space and Recreation Strategy and the current Local Infrastructure Contributions Plan, suggesting that future demand for open space and recreation infrastructure within the Granville catchment may be greater than that reflected in Council's existing strategic planning and infrastructure funding framework.

The EIS also identifies the creation of meaningful connections between the development and surrounding open space assets and seeks to improve access to recreation opportunities and community facilities, including through a new pedestrian bridge connection to Holroyd Sports Ground. The park therefore forms part of a broader open space and recreation network rather than functioning solely as on-site residential amenity.

The Instrument of Consent reinforces this position by expressly approving the delivery of publicly accessible open space as part of the development.

Unlike private communal open space that primarily serves residents of a development, Central Park would constitute publicly accessible community infrastructure. The park would provide enduring benefits to existing residents, future residents, workers, visitors and users of surrounding recreation facilities.

Importantly, the park is not required to facilitate development access or site functionality. While it contributes positively to the attractiveness and amenity of the development, its primary purpose is to provide publicly accessible recreation and open space infrastructure. Accordingly, it exhibits very limited development-enabling characteristics.

Taken together, the Open Space and Recreation Strategy, updated population forecasts, Environmental Impact Statement and Instrument of Consent provide compelling evidence that Central Park responds to an identified infrastructure need, aligns strongly with Council's strategic planning framework and delivers substantial benefits to the wider community. This conclusion is also consistent with recent SSD determinations where publicly accessible open space delivering broader community benefits has been recognised as infrastructure capable of offset recognition.

The proposed works will transform a largely inaccessible former industrial site into a substantial publicly accessible district park. The park will deliver a high-quality landscape outcome for the broader community, replacing an underutilised industrial remnant with activated open space, generous planting and canopy cover, recreational and play facilities, public art and a direct pedestrian and cycle connection to Holroyd Sportsground.

The transformation represents a substantial net community benefit, delivering publicly accessible open space and active recreation infrastructure where none currently exists and significantly improving the quality, accessibility and functionality of the local urban environment.

Conclusion

Criterion	Rating	Alignment
Benefits wider community	✓✓✓	Very High
Addresses local infrastructure needs	✓✓✓	Very High
Strategic alignment	✓✓✓	Very High
Additionality	✓✓✓	Very High

Offset Potential

Very High (100%)

Central Park provides substantial and enduring benefits to the wider community, directly addresses identified open space needs, supports one of Cumberland's highest growth catchments and aligns strongly with Council's adopted strategic planning framework. The available evidence demonstrates that the park functions principally as publicly accessible community infrastructure serving a broader catchment, rather than infrastructure required to facilitate the operation of the development itself. Accordingly, full offset recognition is considered reasonable and justified.

4.2 Pedestrian and Cycle Bridge

Description

The approved development includes the delivery of a pedestrian and cycle bridge across A'Becketts Creek. The bridge provides a direct active transport connection between Central Park and the existing Holroyd Sportsground, linking the development to the wider open space, recreation and active transport network beyond the site, including the broader Duck River corridor.

The bridge is intended to provide safe, convenient and accessible movement for pedestrians and cyclists while improving connectivity between residential areas, recreation facilities, public open space and active transport routes.

The bridge works include:

- Structural and civil enabling works, including geotechnical investigations, excavation and preparation of creek bank and approach areas, foundation works, drainage infrastructure and associated earthworks.
- Bridge substructure comprising reinforced concrete abutments, wingwalls, curtain walls and approach slabs on each bank, together with a mid-span reinforced concrete pier and associated piled foundations.
- Bridge superstructure comprising a two-span steel girder bridge with FRP deck panels, elastomeric bearings, handrails and cyclist rails, providing a deck width suitable for safe pedestrian and cyclist use and flood clearance in accordance with relevant design standards.
- Accessible approach paths and connections at both abutments designed in accordance with applicable accessibility standards, including integration with surrounding pedestrian and cycle networks.
- Bridge lighting and public domain improvements, including Connecting with Country interpretive elements integrated into the bridge structure in accordance with the Public Art Strategy.
- All associated structural, civil, architectural, landscape and embellishment works forming part of the approved bridge design, including any refinements required through detailed design and approval processes.

Assessment

The pedestrian and cycle bridge exhibits strong characteristics of infrastructure capable of offset recognition and demonstrates a very high degree of alignment with the principles typically applied when assessing offset eligibility.

Unlike infrastructure that is primarily required to facilitate development access, the bridge is publicly accessible and delivers benefits to existing residents, visitors and future users of the surrounding open space and active transport network. The bridge creates a continuous, safe and accessible active transport link across A'Becketts Creek, removing an existing physical barrier between the site and Holroyd Sportsground and improving permeability throughout the locality.

By connecting Central Park to Holroyd Sportsground, the bridge effectively unites two complementary recreation assets into a single accessible precinct. The combined offering allows the community to move freely between organised sport at the sportsground and the passive recreation, play and social facilities within Central Park. For example, parents and carers are able to supervise children using the sportsground while remaining within easy reach of Central Park, with the two areas functioning together as one connected family destination.

This connection extends the catchment, accessibility and usefulness of both assets, reinforcing the significance of the wider open space network and delivering a community benefit well beyond the needs of the development alone.

Importantly, the bridge also responds to an identified infrastructure need.

The Cumberland Walking and Cycling Strategy (2024) identifies the need to improve pedestrian and cycling connectivity throughout the Cumberland LGA and recognises that the community seeks improved walking and cycling infrastructure, safer connections and better access to parks, recreation facilities and public transport. The Strategy identifies a network of Regional and District Active Transport Corridors intended to connect centres, open space and public transport across the LGA.

Importantly, the Strategy identifies Corridor 6 – Parramatta to Fairfield (Rail Trail) as both a Regional Corridor and a Strategic Corridor. The corridor is intended to provide a north-south active transport connection linking centres, open space and public transport within the central part of Cumberland.

To the extent that the proposed bridge contributes to, facilitates or enhances access to Corridor 6 and the broader active transport network, the bridge performs a function extending well beyond the development itself. The bridge assists in implementing an adopted Council strategy and contributes towards the delivery of a broader regional active transport network.

The Walking and Cycling Strategy further states that the identified Active Transport Corridors are intended to "provide Regional and District connections for walking and cycling within Cumberland and links to surrounding areas". The bridge therefore forms part of a broader public active transport network and improves connectivity for existing residents, workers, visitors and recreational users.

The bridge is also consistent with broader State and local strategic planning objectives that seek to increase active transport participation, improve access to open space and recreation facilities, reduce reliance on private vehicles and support healthier communities. The bridge enhances access to Holroyd Sportsground, Central Park and other recreation opportunities within the locality and therefore contributes directly to identified community infrastructure needs.

The strategic importance of the bridge is reinforced by the Development Consent, which separately requires contributions towards active transport infrastructure elsewhere within the locality. This demonstrates that active transport infrastructure is recognised as an important component of the broader infrastructure framework applying to the development. In this context, the bridge contributes towards active transport outcomes that extend beyond the boundaries of the development itself.

The bridge also exhibits a high degree of additionality. Access to the development is provided independently via the public road network and the development could function without the

bridge. Its primary purpose is therefore not to facilitate development access, but rather to improve public connectivity, access to recreation facilities and integration with the broader active transport network.

Taken together, the Walking and Cycling Strategy, Development Consent and broader strategic planning framework provide compelling evidence that the bridge responds to an identified infrastructure need, aligns strongly with Council's strategic planning framework and delivers substantial benefits to the wider community. This conclusion is also consistent with recent SSD determinations where publicly accessible transport and active transport infrastructure delivering broader community benefits has been recognised as infrastructure capable of offset recognition.

Conclusion

Criterion	Rating	Alignment
Benefits wider community	✓✓✓	Very High
Addresses local infrastructure needs	✓✓	High
Strategic alignment	✓✓	High
Additionality	✓✓✓	Very High

Offset Potential

Very High (100%)

The bridge provides substantial and enduring benefits to the wider community, addresses identified active transport and recreation needs, aligns strongly with Council's adopted Walking and Cycling Strategy and facilitates access to regional active transport corridors and recreation facilities. The available evidence supports the conclusion that the bridge functions primarily as community infrastructure rather than development-enabling infrastructure and therefore warrants full offset recognition against local infrastructure contributions.

4.3 Internal Road Network

Description

The approved development includes an internal road network comprising Road 1, Road 2 and Road 3, which provide vehicular access, circulation, servicing and emergency access throughout the development site.

The roads facilitate access to residential buildings, retail and commercial uses, loading areas, servicing facilities and associated development infrastructure. The network also provides access to Central Park, publicly accessible open spaces and visitor parking areas within the development.

Assessment

The Internal Road Network exhibits a combination of community infrastructure and development-enabling characteristics.

The roads clearly perform an important development function by providing access, circulation, servicing, loading and emergency vehicle access throughout the site. Without the internal road network, the development could not operate as intended.

However, unlike a conventional private internal circulation network, the roads also facilitate public access to infrastructure intended to serve the broader community. In particular, the network provides access to Central Park, publicly accessible open spaces and visitor parking areas associated with those facilities.

It is understood the loop road arrangement was introduced through the design review process to improve public accessibility to Central Park and strengthen the integration of the park with the surrounding urban environment. To this extent, elements of the road network exhibit a degree of additionality beyond that typically associated with internal development infrastructure.

The roads will also ultimately form part of the public domain and contribute to local permeability and connectivity within the precinct. Their role extends beyond site access by facilitating movement between publicly accessible destinations and supporting access to community infrastructure.

The network therefore provides broader community benefits that are not typically associated with conventional internal development roads.

Notwithstanding these considerations, the primary function of the road network remains to facilitate access to residential, retail and commercial development within the site. The principal beneficiaries of the infrastructure are future residents, workers, visitors, service providers and emergency services accessing the development.

Unlike the Crescent Street widening and intersection upgrades, there is limited evidence that the internal road network addresses an existing deficiency within the surrounding public road network or performs a strategic transport function extending beyond the site boundaries.

Similarly, while the roads support access to community infrastructure, they are not themselves specifically identified within Council's strategic planning framework as priority transport, active transport or community infrastructure projects.

Accordingly, the Internal Road Network exhibits moderate characteristics of offsetable infrastructure and demonstrates a moderate degree of community benefit, infrastructure need and additionality. However, these characteristics must be balanced against its development-enabling role.

Conclusion

Criterion	Rating	Alignment
Benefits wider community	✓✓	High
Addresses local infrastructure needs	✓✓	High
Strategic alignment	✓	Medium
Additionality	✓	Medium

Offset Potential

Medium (40-60% of capital cost, say 50%)

The Internal Road Network provides a range of community benefits, including facilitating access to Central Park, publicly accessible open space and visitor parking, and exhibits a greater degree of additionality than would typically be associated with conventional internal circulation roads. However, the network also performs significant development-enabling functions and remains fundamentally linked to the operation of the development. While the available evidence supports a medium-high offset potential relative to typical internal road infrastructure, any offset recognition would likely be more limited than for the other infrastructure items assessed.

4.4 Crescent Street / Woodville Road Intersection Upgrade

Description

The approved development includes upgrades to the Crescent Street / Woodville Road intersection, including additional traffic lanes, intersection improvements and associated traffic management measures intended to improve the operation of the surrounding road network.

The works are located within the public road network and form part of a broader package of transport infrastructure upgrades associated with the development and the surrounding area.

Assessment

The Crescent Street / Woodville Road intersection upgrade exhibits both community infrastructure and development-enabling characteristics.

On one hand, the upgrade assists in accommodating traffic generated by the approved development and therefore performs an important enabling function. The development would clearly benefit from the increased capacity and improved operation of the intersection.

However, the available evidence indicates that the upgrade also addresses existing deficiencies within the broader public road network and provides substantial benefits to existing road users independent of the development.

The Transport Impact Assessments prepared in support of both the Planning Proposal and the SSD identify that the Crescent Street / Woodville Road intersection was already operating at unsatisfactory levels prior to the development, with the intersection experiencing Level of Service F conditions during peak periods. The assessments also identify existing queuing and operational constraints affecting the broader road network.

Importantly, the transport assessments demonstrate that the proposed upgrade would provide substantial benefits even in scenarios excluding the proposed development. Future-year modelling undertaken without the development indicates that the upgraded intersection would provide additional capacity to accommodate existing traffic demands and future background growth.

The assessments further note that upgrades to the surrounding road network were being pursued by RMS/TfNSW to address existing traffic demands and improve network performance. This indicates that the upgrade is not solely attributable to development-generated traffic and that a significant proportion of the benefits accrue to the wider community.

The intersection upgrade provides benefits to:

- existing residents and businesses
- existing workers and visitors
- public transport users
- regional through traffic
- future background growth
- future residents of the development.

The works improve traffic operations, reduce delays and queuing, improve intersection efficiency and enhance the performance of a key component of the local and regional road network.

Unlike the Internal Road Network, which primarily serves the development itself, the intersection upgrade is located within the public road system and provides benefits to a broad range of users irrespective of whether they are associated with the development.

The upgrade therefore responds to an identified infrastructure need and exhibits a moderate degree of additionality, as the available evidence demonstrates that the works address existing transport constraints and deliver benefits extending beyond those required to facilitate the development itself.

Conclusion

Criterion	Rating	Alignment
Benefits wider community	✓✓	High
Addresses local infrastructure needs	✓✓	High
Strategic alignment	✓	Medium
Additionality	✓✓	High

Offset Potential

High (50-70%, say 60%)

The available evidence demonstrates that the Crescent Street / Woodville Road intersection upgrade addresses existing deficiencies within the public road network and provides substantial benefits to the wider community in addition to accommodating development-generated traffic. While the development clearly benefits from the increased capacity and improved intersection performance, the transport assessments indicate that the upgrade would provide significant network benefits even in the absence of the development.

Accordingly, the upgrade is considered to provide substantial benefits to both the wider community and the development. The works respond to an identified transport infrastructure need, improve the performance of the public road network and provide benefits extending beyond those required to facilitate the development itself. On balance, the intersection upgrade exhibits a medium offset potential, reflecting the shared benefits accruing to both the wider community and the approved development.

4.5 Crescent Street Widening and Upgrade

Description

The approved development includes the widening and upgrade of Crescent Street, including additional traffic lanes, upgraded intersections, public domain improvements, pedestrian infrastructure and associated road works.

The works form part of the broader transport infrastructure package associated with the development and are located within the existing public road network.

Assessment

The Crescent Street widening and upgrade exhibits both community infrastructure and development-enabling characteristics.

The widening works assist in accommodating traffic generated by the approved development and improve access to the site. To that extent, the works perform an important enabling function

and provide direct benefits to future residents, workers and visitors associated with the development.

However, the available evidence indicates that the widening works also address existing deficiencies within the broader public road network and provide substantial benefits to existing road users independent of the development.

The Transport Impact Assessments prepared in support of both the Planning Proposal and the SSD identify existing operational constraints within Crescent Street, including significant queuing and delays associated with the Crescent Street / Woodville Road intersection. The assessments demonstrate that the proposed widening works would improve traffic flow, reduce queuing and enhance the operation of the surrounding road network.

Importantly, the transport assessments indicate that the widening works provide benefits beyond accommodating development-generated traffic. Existing traffic modelling identified that queues on Crescent Street already extended beyond the development frontage and that the widening works would substantially improve traffic operations for existing road users. The assessments conclude that the upgraded road network would provide improved performance and increased capacity even in scenarios excluding the proposed development.

The assessments further note that upgrades to the surrounding road network were being pursued by RMS/TfNSW to address existing traffic demands and improve network performance. This indicates that the widening works are not solely attributable to development-generated traffic and that a significant proportion of the benefits accrue to the wider community.

The widening works provide benefits to:

- existing residents and businesses
- existing workers and visitors
- public transport users
- regional through traffic
- future background growth
- future residents of the development.

In addition to traffic and operational benefits, the works include public domain and pedestrian improvements that enhance accessibility, pedestrian movement, streetscape quality and the overall functionality of the public realm.

These broader benefits distinguish the Crescent Street widening works from the Internal Road Network, which primarily serves the development itself.

The available evidence therefore indicates that the widening works perform a dual function. They assist in accommodating development-generated demand while also addressing existing network deficiencies and improving the operation, accessibility and amenity of the broader public road system.

The widening works therefore respond to an identified infrastructure need and exhibit a moderate degree of additionality, as the available evidence demonstrates that the works deliver benefits extending beyond those required to facilitate the development itself.

Conclusion

Criterion	Rating	Alignment
Benefits wider community	✓✓	High
Addresses local infrastructure needs	✓✓	High
Strategic alignment	✓	Medium
Additionality	✓✓	High

Offset Potential

High (50-70%, say 60%)

The available evidence demonstrates that the Crescent Street widening and upgrade provides substantial benefits to the wider community in addition to accommodating development-generated traffic. The transport assessments identify existing operational deficiencies within Crescent Street and demonstrate that the proposed works would improve traffic flow, reduce queuing and enhance the performance of the broader road network independent of the development.

While the development clearly benefits from the increased road capacity and improved access arrangements, the available evidence indicates that a significant proportion of the benefits accrue to existing road users, future background growth and the broader community. The works also provide public domain and pedestrian improvements that enhance the functionality and accessibility of the public realm. Accordingly, the widening works are considered to provide substantial benefits to both the wider community and the development. On balance, the Crescent Street widening and upgrade exhibits a medium offset potential, reflecting the shared benefits accruing to both the public road network and the approved development.

5. Assessment Matrix

Infrastructure item	Community benefit	Infrastructure need	Strategic alignment	Additionality	Offset potential	Offset potential (% of capital cost)
Central Park	✓✓✓	✓✓✓	✓✓✓	✓✓✓	Very High	100%
Pedestrian & cycle bridge	✓✓✓	✓✓	✓✓	✓✓✓	Very High	100%
Internal road network	✓✓	✓✓	✓	✓	Medium	40-60%, say 50%
Intersection upgrade	✓✓	✓✓	✓	✓✓	High	50-70%, say 60%
Crescent Street widening	✓✓	✓✓	✓	✓✓	High	50-70%, say 60%

Note: Assessment ratings are qualitative indicators of the relative strength of alignment with each criterion.

✓✓✓ = Very high alignment

✓✓ = High alignment

✓ = Medium alignment

✗ = Little or no alignment

6. Conclusion

The assessment demonstrates that all five infrastructure items exhibit characteristics capable of supporting offset recognition. However, the strength of the case varies depending on the extent to which each item delivers broader community benefits, responds to identified infrastructure needs, aligns with adopted strategic planning objectives and exhibits additionality beyond that required to facilitate the development itself.

The strongest case for offset recognition exists in relation to Central Park and the Pedestrian and Cycle Bridge. Both items provide substantial and enduring benefits to the wider community, respond directly to identified infrastructure needs and exhibit a very high degree of alignment with Council's strategic planning framework. Importantly, both items perform functions extending well beyond the development itself and exhibit very high offset potential.

The Internal Road Network also demonstrates a credible basis for offset recognition. While the network performs important development-enabling functions, it also facilitates public access to Central Park, publicly accessible open space and visitor parking, contributes to local permeability and connectivity, and exhibits a greater degree of additionality than would typically be associated with conventional internal circulation roads. Accordingly, the Internal Road Network exhibits a high offset potential relative to typical development-enabling infrastructure.

The Crescent Street / Woodville Road Intersection Upgrade and Crescent Street Widening and Upgrade provide substantial benefits to the wider community in addition to accommodating development-generated traffic. The available transport evidence indicates that both items address existing network constraints, improve the operation of the broader road network and provide benefits extending beyond those required to facilitate the development itself. Accordingly, both transport infrastructure items exhibit a medium offset potential.

Overall, the assessment indicates that Central Park and the Pedestrian and Cycle Bridge represent the strongest candidates for offset recognition, followed by the Internal Road Network, with the Crescent Street / Woodville Road Intersection Upgrade and Crescent Street Widening and Upgrade also demonstrating a reasonable basis for offset recognition.

Importantly, the assessment is consistent with the discretion available to the consent authority under section 7.13(2) of the EP&A Act. As the Crescent Parklands development was approved as State Significant Development, the Minister or delegate is not bound to impose a contribution strictly in accordance with the Cumberland Local Infrastructure Contributions Plan and may have regard to the nature, value and public benefit of infrastructure delivered directly by the developer. The assessment in this advice provides an evidentiary basis for the consent authority to consider offset recognition in a manner that is reasonable, transparent and consistent with the purpose of development contributions.

Appendix A:
Existing Site Photos

Photo 1: View south to north across cleared hardstand and paving

Photo 2: View east to west across cleared hardstand and paving

Photo 3: View north-east across cleared hardstand and paving

Appendix B: Infrastructure Works Imagery

Image 1: Central Park

Image 2: Central Park play space

Appendix C: References

1. SSD-70283710 Development Consent (31 March 2026)
2. Crescent Parklands Environmental Impact Statement (January 2025)
3. Crescent Parklands Transport Impact Assessment for Planning Proposal (October 2019)
4. Crescent Parklands Submissions and Amendment Report (November 2025)
5. Cumberland Open Space and Recreation Strategy 2019–2029
6. Cumberland Walking and Cycling Strategy 2024
7. Cumberland Local Infrastructure Contributions Plan 2020
8. .id Population Forecasts for Cumberland City Council (2026–2046)
9. Environmental Planning and Assessment Act 1979
10. Environmental Planning and Assessment Regulation 2021
11. NSW Practice Notes – Local Infrastructure Contributions (Department of Planning, Housing and Infrastructure)
12. NSW Practice Note – Planning Agreements (Department of Planning, Housing and Infrastructure)

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Connecting vision, funding and delivery.

www.infragrowth.com.au
info@infragrowth.com.au
ABN 85 691 199 596
Sydney, NSW