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SUBJECT:

**SUBMISSION - HOMEBUSH BAY BRIDGE – PROJECT
APPLICATION MP 10_0192 Proposed public transport and
pedestrian / cycleway bridge across Homebush Bay
(Wentworth Point to Rhodes)**

Thank you for the opportunity to comment on the Draft Environmental Assessment for the Homebush Bay Bridge Application. Auburn City Council recognises that the proposed bridge could provide a new infrastructure facility linking the communities of Wentworth Point and Rhodes.

However, it is Council's view that the application must be assessed concurrently with the Planning Proposal to increase the building envelope controls that apply to Wentworth Point, as the two proposals are inextricably linked.

As previously indicated, Auburn City Council has resolved (Item 097/10 - April 21, 2010) to support the proposal for the Homebush Bay Bridge subject to it being;

"..undertaken at no financial cost, nor loss of Section 94 contributions to Auburn City Council" and "That Council not accede to any density increases until Council has considered and agreed to a revised master plan".

We recommend that the proposal be deferred and be considered concurrently with the Planning Proposal and Voluntary Planning Agreement. This is to ensure that the Wentworth Point and Rhodes Communities are not burdened with additional density that would result in further pressure on the existing infrastructure, including a traffic and transport network that is already at capacity, and no certainty as to whether the Homebush Bridge will ever be constructed.

Council wishes to stress that should the Homebush Bay Bridge application and the Planning Proposal to increase building envelope controls proceed, it should not be regarded as being in lieu of Section 94 Developer Contributions or Contributions in-kind that will be required to meet the needs of the future population.

In the context of the above, Council wishes to raise the following related issues / concerns:

STRATEGIC CONTEXT

2.1 Justification and conclusion Part D Chapter 20; Also Executive Summary pp v-vii

There is insufficient strategic justification for the bridge proposal in terms of key strategic themes, which are identified in NSW State Plans and strategies.

There is insufficient information to justify the stated benefits or to demonstrate community interest or demand for the bridge – as there is no reference to any demand survey, needs analysis, community survey, demographic analysis, social, economic and amenity impact assessment.

Comment – Community Interest and Demand

The stated project justification is for a pedestrian, cyclist and buses bridge "which would potentially improve accessibility and connectivity" regionally and within the Wentworth Point, Rhodes and Sydney Olympic Park area.

There is insufficient information – modelling data, community surveys, etc to verify potential demand for the travel connections mentioned within Rhodes, Wentworth Point, the ferry wharf, and Sydney Olympic Park facilities.

There has been no attempt to test and justify the stated benefits of the proposed bridge, via travel surveys and travel data collection, telephone surveys, mail back surveys, observational surveys, internet based surveys and GPS surveys. The modelling did not consider qualitative attributes associated with travelling modes, such as comfort, weather, safety, reliability etc

There is no indication of the extent of community support for the bridge proposal, and whether there has been any significant discussion on the proposed increases to the building envelope controls.

2.14 Homebush Bay West Development Control Plan

The DCP requires development to occur over 9 individual allotments. The development is required to occur either in an east/west direction (from Hill Road to the foreshore) or in a south to north direction (from Footbridge Boulevard and extending to the north along Hill Road). Council has to-date approved 2 developments under the Billbergia DCP (DA-38/2011 and DA111/2010) which indicate that the developer's intention is to develop the site in a south to north direction. To this extent, the bridge development would not physically impact on the buildings approved by Council thus far, as there is a substantial separation between the eastern terminus of the bridge and the buildings approved to the west.

The approved construction levels for the site under the DCP (and as thus far approved by Council) will involve a street level of approximately RL 2.5 m at Hill Road rising to height of around RL7.5m at Ridge Road and then falling back to around RL2.5 at the foreshore. The bridge design appears to be

connecting at the highest point at Ridge Road. This design is, broadly speaking, consistent with the original DCP design and would not appear to create any major impediments to the future development of the precinct.

The DCP makes provision for the creation of a footbridge connecting adjacent to the eastern end of Footbridge Boulevard, and extending over and within the urban park as detailed in the DCP. It is noted that the footbridge envisaged by the DCP differs from the new bridge design currently proposed in that the current proposal links directly to Footbridge Boulevard so as to provide for vehicular traffic as well as pedestrian/cycle links compared with the DCP design of a pedestrian/cycle bridge only, and being connected to the designated parkland space.

Comment: Issue of Increased Building Envelope Controls

While current permissible development under the HBW DCP is approximately 7,000 dwellings, the intended DCP changes to support the proposed bridge development will result in an additional 1,353 dwellings (8,349 dwellings in total).

The bridge would connect with the portion of the land at Wentworth Point identified as Lot 122 DP 1156412. This allotment, together with the adjoining western land parcel (Lot 121 DP 1156412) are affected by the No.1 Burroway Road DCP 2006 (the DCP), which is generally known as the Billbergia Masterplan.

It is noted that these proposed changes to the current planning control provisions are different to the variation put forward by the Department in its letter to Council dated 16 November 2010 (Attachment C). Auburn City Council, at its meeting on 21 April 2010, resolved "2) That Billbergia and Payce / Sekisui House submit a revised masterplan of the site to Council" and "3) That Council not accede to any density increase until Council has considered and agreed to the revised masterplan".

While the Department has previously informed Council it will seek Council's opinion on the impacts of the any proposed DCP building envelope controls, this consultation has not occurred.

As stated in the EA report (Appendix G – Appendix C p 5) "The proposal will also involve additional floorspace of permissible development, based on the increased accessibility and amenity offered by the proposed HBB. In particular, the proposed DCP changes are said in the EA to include provision for:

- Increase residential floor space by about 105,000 m²
- Increase building heights in a number of areas from 32 metres / 8 storeys to between 48 and 91 metres (16 to 25 storeys).
- Make changes to streets and local land use to improve the integration of the bridge landing".

Furthermore in its response dated 20th December 2010, Council indicated it would not support an increase in the building envelope controls for the area as the current controls are considered to be the appropriate vision for the area. It was also noted that there is no new urban planning framework of urban design principles that would underpin the new vision. Thus the proponent's urban design justification falls well-short of any robust urban design review for the peninsula.

5 Proposal cost and funding (Part B Chapter 5)

Proposal Cost Section 5.1

There is no reference to the RTA's Guidelines for the Economic Evaluation of Pedestrian Facilities (currently in draft), which provide very detailed modelling and quantification advice for the appraisal of intersections and walking infrastructure.

The estimated cost of the bridge appears to be too low. Council is very concerned that it may find itself in a situation where the proponents achieve the increase in floorspace – as per the bridge proposal – but see no bridge built because of construction cost increases and/or that any VPA provision caps the developer's contribution.

The State Government should provide a financial guarantee that the bridge will be fully funded and a construction authority be established to ensure that construction is completed. In addition should be a proponent to the VPA.

Auburn City Council affirms that if the Homebush Bay Bridge proposal is to be approved, then a construction authority must be immediately established, including terms of agreement clearly stipulating ownership and maintenance responsibility. SOPA must accept full responsibility for the ownership and maintenance of the bridge so that the burden is not borne by the Wentworth Point and Rhodes Community.

Proposal Funding Section 5.2

It is proposed that the project is to be funded by landowners under a proposed VPA, which is yet to be released. There is insufficient information for Council to assess the VPA provisions, and any consequential changes to the HBW DCP planning provisions that are likely to include increasing residential densities within the Wentworth Point precinct.

Consequently, as outlined in Council's previous letter to the Department dated 20th December 2010 (Attachment A), Council does not support any funding plan for the Homebush Bay Bridge proposal that is dependent on an increase in the building envelope controls, an increase in dwelling numbers or dwelling densities, or reduction in provision of public open space at Wentworth Point.

Council requests a financial analysis is provided to ensure the land owners / developers are not attempting to gain additional floor space beyond the cost of the bridge.

6. Communications and consultation (Part B Chapter 6 and Appendix D and E)

The applicant has only undertaken a standard community consultation process as required by the Director General's requirements. Auburn City Council request that a Public Hearing be held to enable all interested parties to fully understand the proposal, including the complexities of the funding arrangements and the proposed increases in building envelope controls in Wentworth Point

The completed community consultation has not included all aspects of the proposal, particularly in relation to the intended DCP amendments, and the full significance of the social and public domain impacts of any DCP changes.

There is no indication of the extent of community support for the bridge proposal, and whether there has been any significant discussion on the proposed increases to the building envelope controls. The community consultation process focused primarily on the technical, design and environmental impacts of the bridge proposal, as listed in *Table 6.2 Issues raised by the Homebush Bay Bridge community reference group* (p 74). There are no references to wider community issues or other potential "community impacts" of the proposal. It is also noted from Table 6.3 in relation to wider community issues raised by adjacent land owners at Rhodes, they were deemed "Not relevant to the proposal" (p.76).

There has been no baseline study of the community's existing social environment by analysing demographic characteristics, social infrastructure, social values and lifestyles, or current pedestrian, walking and cycling activities, that would support the view "*It is likely that the numbers of pedestrians and cyclists on the Homebush Bay area would be higher as a result of the proposal given the likelihood of walking and cycling to access trains at Rhodes*" (p120).

8. Traffic Management and Access (Part C Chapter 8 and Appendix G)

The proposed bridge would provide a new infrastructure facility linking the communities of Wentworth Point and Rhodes. The proposed bridge will in theory facilitate mode shift in the Wentworth Point area. However more detailed investigation is required to analyse:

- The current (2012) mode share in established developments in Wentworth Point; and
- Opinion of residents in relation to utilization of the bridge.

No traffic impact assessment has been undertaken to analyse the network performance at key junctions with future development in place. Rather reference has been made to studies which were undertaken for previously proposed developments. These studies indicate that three junctions along Silverwater Road are currently experiencing capacity issues, namely:

- Holker Street;
- Hill Road and M4 Off Ramp; and
- Hill Road and Great Western Highway and Bombay Street

Given the scale of the development proposed (8349 dwellings including a proposed 20% uplift) it is likely that these junctions will experience severe capacity issues with development in place.

Council therefore requests that that applicant undertake a modelling exercise utilising the existing Homebush Bay traffic model to analyse the traffic impact of the proposed development, and propose mitigation measures to facilitate the increase in traffic which would occur.

The proposed bridge cross-section does not comply with the requirements of Austroads Standards Guide to Road Design Part 3.

Further, there has been no statistical analysis on any survey data of the Wentworth Point population on the basis of traveller type and by trip characteristics such as trip purpose, trip length, and household parameters such as household size and age group.

The EA therefore does not adequately demonstrate two of the Director General's requirements, namely:

"how the project would quantitatively contribute towards achieving the NSW Government targets of increasing the share of commuter trips made by public transport (to and from the Sydney CBD and to and from the Parramatta CBD), increasing the proportion of total journeys to work by public transport in the Sydney Metropolitan Region and increasing the mode share of bicycle trips".

"how the project facilitates the efficient movement of public transport services to meet the needs of existing and future residents served by the proposal, including the needs of special events at Sydney Olympic Park, having regard to efficient travel speed and road safety;

The TMAP relies on journey- to-work data from the 2006 Census and uses RTA trip generation methodology "that shows the current transport patterns for Wentworth Point." (Table 4.1 p39). The table excludes 'worked from home' and 'did not go to work', and noted "that the counts ...are relatively low".

The TMAP predicts that "from 2023 the bridge would increase the proportion of total peak hour journeys by public transport in Wentworth Point to 33%" (p.112). However, these figures are based on a very small base population at the Census 2006 – being 1,363 for Wentworth Point and 990 for Rhodes, and a small travelling population of 707 for Wentworth Point and 130 for Rhodes. These numbers would not be reliable to model the future travel behaviour of Wentworth Point residents. The TMAP analysis is based on a hypothetical travel environment in merely assessing the potential of the bridge proposal and related access modes of busways, walkways and cycling.

It is likely that overall travel behaviour of the Wentworth Point population will be highly influenced by travellers reliant on the car, and who will not use any other mode in the future, even with the provision of the buses services on the Bridge to Rhodes.

Auburn City Council has strong concerns with the accuracy of the mode share figure presented in the EA. However, should this be correct, concern is raised about the capacity of the train and bus network at Rhodes and Wentworth Point. It is strongly recommended that the Department of Planning ensure that RailCorp (Transport NSW) commit to network re-design that would achieve capacity improvements.

Walking and Cycling

The EA states on page 112 "It is likely that the numbers of pedestrians and cyclists on the Homebush Bay area would be higher as a result of the proposal given the likelihood of walking and cycling to access trains at Rhodes".

This is a vague speculation as it does indicate whether this cycling activity will derive from the actual resident population at Wentworth Point or from other localities that are currently cycling to Rhodes.

The EA only provides hypothetical generalisations, as there has been no application of appropriate methodologies for the estimation of the number of cyclists expected to use the proposed bridge cycling facility.

The EA thus cannot claim that, on the information provided, "Therefore, it is considered the proposal would contribute to achieving the targets for public transport and bicycle trips outlined in NSW 2012". (p122)

9. Public Domain (Chapter 9)

Pedestrian and Cycling Benefits – Bridge Connections – Local and Regional Connectivity (Sections 9.1.1 and 9.1.2 and 9.2.1)

Comments: Regional Connections

There has been no multi-modal transport modelling to accurately predict how the specific changes in walking and cycling conditions to be provided by the proposed bridge (including the quality of non-motorised facilities, roadway design, traffic volumes and speeds, transport pricing, and land use patterns) will affect the use of active modes. This should also be disaggregated by demographic factors (who would change their travel activity) and trip type (what types of travel would change, such as commuting, errands, recreation, etc.).

There has been no application of an appropriate methodology for the estimation of the number of cyclists expected to use the proposed bridge, and which formally derives demand estimates for facilities that are yet to be constructed, nor any quantification of network effects of adding one or more new facilities into an existing road network, nor any estimation of resulting usage of this particular facility given its location within and connectivity to an existing road and cycle network.

The location and configuration of the proposed bridge is not likely to provide a high level increase to regional connectivity, in a network and connectivity sense, as it provides connection to only 3 other transit nodes (the ferry, the Rhodes rail / bus, and the Wentworth Point bus stop) where each requires interchange and timetable coordination (Fig 9.1).

While mention is made of open space areas including Sydney Olympic Park parklands, retail opportunities at Rhodes shopping centre, community facilities (such as the future maritime school and rowing facilities at Wentworth Point and the community centre at Rhodes (p119), there is no quantitative data on travel thresholds or traveller interests/preferences/choices that would drive travel to these facilities.

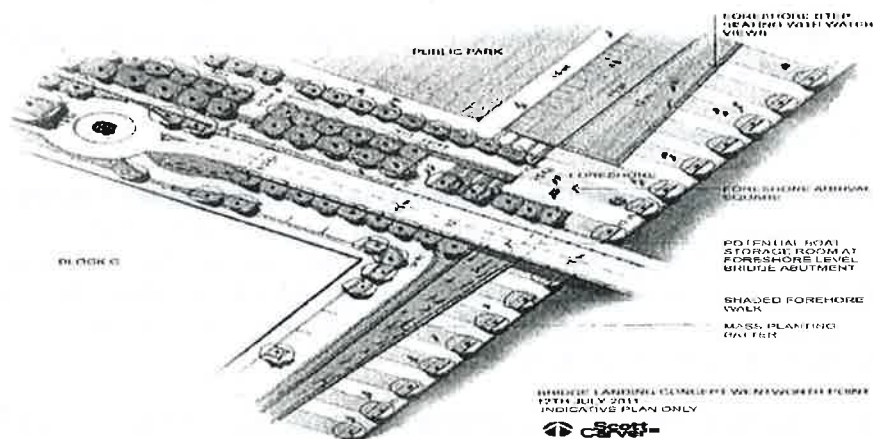
Comment: Wentworth Point Bridge Landing - Cycle Connections

The benefits of the grade-separated landing/approach at the Wentworth Point end of the bridge are noted (i.e. safety). However there appears to be extremely poor connection, particularly for cyclists, between the Wentworth Point side Promenade and the Wentworth Point bridge approach. It is anticipated that this will be a strong desire line for both recreational and commuter cyclists. The

cycling connections between bridge approach and promenade need to be improved to both the north (via replacement of steps with a ramp, or via an addition of a ramp) and south (via a ramp through the "mass planting batter") of the bridge. These recommended improvements will also significantly improve connectivity and accessibility for people with prams, and people in wheelchairs.

It is essential that the space under the bridge on the Wentworth Point side be appropriately illuminated at night time, as this Promenade cycle/pedestrian is likely to be used by commuter cyclists.

Landing at Wentworth Point Fig 9.7 and Fig 9.8; Appendix H – Urban Design Report 4.4.2



The bridge proposal, its abutment and access infrastructure (as seen above) reduces the effective size of the park and its suitability for a wide range of more active recreational activities. This is of particular concern, as this open space is intended as the only new large scale park for the whole Wentworth Point precinct.

It is suggested that the section between the public park and the bridge be reconfigured to reduce the negative impact on the park. Or as an alternative option, consideration should be given to re-locating the bridge's access facilities to the southern (non-park) Block G side of the abutment.

Comment: Impact on Precinct Open Space - Current Open Space Standards

The Wentworth Point residential precinct – given its current permissible dwellings of 7,000 - is already seriously deficient in its open space provisions (as set out in the HBW DCP ref 3.3 and 3.3.4) and which are well below other benchmark provisions standards, for example at Rhodes.

An uplift to provide an additional estimated 1,200 to 1,353 dwellings to fund the proposal will further reduce these already unacceptable per person open space standards / provision ratios.

10 Visual amenity and overshadowing – Chapter 10

Council has previously indicated “concerns about the visual impact of the bridge landing at Wentworth Point” (p.77).

The abutment at Wentworth Point is visually very prominent in terms of its bulk and height above the Promenade – as can be seen in the figure opposite p83, and Figs 10.9 and 10.10.

Consideration should be given to alternative design treatments, and/or more specific examples provided of “visual modification measures” including public art and facade treatments. Specifically, Auburn City Council recommends that the Public Art Strategy prepared by Milne and Stonehouse & Guppy and Associates for Canada Bay Council be utilised and applied.

20. Justification and Conclusion

- Objectives of the EP&A Act (Part D Chapter 20 Table 20.1)

- **Promoting the social and economic welfare of the community and a better environment**

Comment:

There is no reference to any social impact assessment (SIA) which is a proactive and anticipatory tool used to help understand the potential impacts that a proposed project may have on a community. Such an SIA would have more assessed the potential for social welfare benefits, as required under the EP&A Act.

There is no inclusion of a Cost benefit analysis (CBA) to enable the efficiency of the proposal as an investment option to be assessed. Such a CBA would have more comprehensively assessed economic welfare outcomes, as required under the EP&A Act.

Social Impact Assessment and Cost Benefit Analysis of major transit infrastructure projects is standard practice, neither of these have been undertaken for this proposal.

- **To provide increased opportunity for public involvement and participation in environmental planning and assessment**


Comment:

The community consultation process merely involved briefings to stakeholders and focused primarily on the technical, design and environmental impacts of the bridge proposal.

The Wentworth Point community did not get sufficient information nor opportunities to review or fully consider the costs and benefits of the proposal. There was no community consultation for the bridge proposal in relation to the proposed increases to the building envelope controls. As previously mentioned, Council requests a Public Hearing on the matter be undertaken.

Auburn City Council may also wish to provide additional comments or raise other related issues at a later date. We reiterate that the application must be assessed concurrently with the Planning Proposal to increase the building envelope controls that apply to Wentworth Point, as the two proposals are inextricably linked.

Yours faithfully,



MARK BRISBY
DIRECTOR PLANNING AND ENVIRONMENT

Attachment A – Auburn City Council letter 20th December 2010
Attachment B – Auburn City Council letter 17th May 2011

Attachment A



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20th December 2010

Dear Mr Gellibrand,

SUBJECT: PROPOSAL TO EXPAND PLANNING CONTROLS AT WENTWORTH POINT

Thank you for your letter dated 16 November 2010 inviting Council to comment on the proposed expansion of the planning controls that apply to a part of Wentworth Point. Council welcomes the opportunity to provide its views on this issue. The proposal will - should it proceed through to notification - have a significant impact on Wentworth Point and nearby communities.

The proposal seeks to:

- Provide for approximately 120,000 square metres of additional residential floorspace by increasing the existing maximum floor space ratio (FSR) from 1.5:1 to between 1.8:1 and 2.4:1;
- Increase building height from 32 metres to between 48.1 and 91.5 metres; and
- Zone the sites R4 High Density and introduces a small business centre at the north-west corner of the site and "increase public open space".

Council considers the Department's letter of invitation with accompanying attachments insufficient to address all of the complex issues that the proposal will have on the Auburn community should it be successful. Therefore, Council has relied on the following documents in preparing its response:

1. Planning Proposal – Wentworth Point – Draft Auburn Local Environmental Plan 2009 by the Urban Futures Group (18th August 2010);
2. Homebush Bay Bridge Preliminary Environmental Assessment Report by the Urban Futures Group (18th August 2010);
3. The Urban Design Review prepared by Scott Carver (August 2010);
4. Wentworth Point Strategic Transport Review prepared by Scape (July 2010);
5. Homebush Bay Pedestrian/Bicycle Bridge Social Impact Study Final Report prepared by Heather Nesbitt Planning (September 2005); and
6. Summary of Key Terms of Proposed Homebush Bay Bridge Planning Agreement (VPA) prepared by Lindsay Taylor Lawyers (18 August 2010).

Council has, where appropriate, also included a broad critique of the above documents in preparing its submission.

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PREFERRED RELEVANT AUTHORITY

Council does not support a planning policy review process at Wentworth Point that sees an amendment to the current plans which sit under the *SREP 24 – Homebush Bay West* ("the SREP") by way of a new DCP. Rather, Council sees that an amendment to the recently notified *Auburn Local Environmental Plan 2010* ("Auburn LEP 2010") is the preferred approach.

Council worked hard on the *Auburn LEP 2010* to integrate Newington, the 2KY site at Sydney Olympic Park and Meriton's Sterling Apartments site into the principal LEP, along with translating the complex controls for the Wentworth Point area. The decision by the Department to defer the area from the *Auburn LEP 2010* means that Council is very keen to have this land included in the LEP as soon as practical. Council's reasons to be the relevant planning authority are as follows:

- On account of the recent making of the *Auburn LEP 2010*, the *SREP* now solely exists for Wentworth Point. In order to be consistent with the Department of Planning's approach to simplify the NSW planning system, it would make more sense to integrate the Wentworth Point controls into the *Auburn LEP 2010* as soon as practicable, rather than keep the *SREP* alive for the sake of new controls that would only have to be integrated into the *Auburn LEP 2010* at a later stage. An amendment to the plans under the *SREP* means inefficiency, substantial duplication and a waste of Council's and the Department's resources.
- Council is keen to simplify the local planning regime affecting the LGA by bringing in the controls for Wentworth Point into the *Auburn LEP 2010*. This would remove an extra state government EPI from the planning process.
- The proponent's initial submission to the Department of Planning ("the Department") was made in mid August this year when Council's *Auburn LEP 2010* had not been made. However, since that time, Council now has its new comprehensive LEP notified. For this reason, Council would now be the relevant authority to consider this proposal. Furthermore, the proponent's Planning Proposal (18th August 2010) states that "the Draft Auburn LEP 2001 is considered to be the most relevant EPI and the instrument that requires amendment by the Wentworth Point Planning Proposal", (p.14).

Given the notification of the principal *Auburn LEP 2010* on 29th October 2010, it is clear that Auburn City Council should be the relevant planning authority. The process however, could still happen in partnership with the Department of Planning by having the Department as peer review. Therefore, Council does not support a new DCP process and therefore does not provide comments in this regard, as requested in the Department's letter.

INCREASES IN BUILDING ENVELOPE CONTROLS

The increases in the building envelope controls are detailed in the table below:

Current controls*	Proposed controls/zones	Difference
32 metres	48 - 91.5 metres	16 - 69.5 metres
1.5:1 FSR	1.8:1 - 2.4:1	0.3 - 0.9 (= 2% and 2%)

*As per Homebush Bay West DCP (2004); No.1 Burroway Road DCP; Major Project Assessment MP06_098; and recent DA approvals of Council.

Council does not support an increase in the building envelope controls for the area as Council considers the current building envelope controls - as translated and subsequently exhibited in Draft

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Auburn LEP 2009 - to be the appropriate vision for the area. Please refer to the Urban Design Analysis section in this submission below.

ZONING CHANGES

The amendments proposed to the zonings are provided in the table overleaf:

Current controls*	Proposed controls/zones	Difference
R4 zone	R4 and B2 zones	Introduction of a local centre
RE1 zone	RE1 zone expansion	Not known

*As per Homebush Bay West DCP (2004); No.1 Burroway Road DCP; Major Project Assessment MP06_098; and recent DA approvals of Council.

Open Space

The proponent notes there will be an increase in the amount of public space. However, the exact additional amount is not stipulated within the documentation. The amount of public space provision needs to be very clear at this stage of the proposal so Council can be certain that the appropriate amount of public space is provided to this new community, particularly in light of the significant increase in population together with the substantial reduction of Wentworth Point on NSW Maritime land immediately to the north.

Bridge Landing Issues

There is no discussion about the treatment of public domain around in bridge landing on the Wentworth Point side, nor is there a clear justification for loss of public space where it intersects with the bridge landing. In fact, there is no discussion about how much public space land needs to be utilised to accommodate the bridge landing.

R4 Zone

Council supports the application of the R4 High Density zone over the bulk of the proposed area.

New local centre

Should the proposal succeed, then Council would see the need for a local centre as proposed by the proposal. Council supports its location, at this early stage.

STRATEGIC JUSTIFICATION

Council does not agree the proposal is a means to justify a revisiting of the sub-regional role of Wentworth Point nor does Council support the view that the Wentworth Point locality is an area for substantial growth. Furthermore, Council does not agree with the proponent that this locality has any role with the Olympic Park – Rhodes Specialised centre because it is located well-outside of this centre's 1km radius.

In the spirit of the *Metropolitan Strategy* and the *West Central Subregion Draft Subregional Strategy*, Council sees that much of the future growth in the LGA is best located within its local centres, especially in its town centres (Auburn and Lidcombe) and villages (Berala and Regents Park) because these are well service by rail.

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The Wentworth Point neighbourhood centre (which has a radius of 150 metres) is built to capacity and has no public transport service aside from a limited ferry service. Thus it is very limited in its growth potential and Council sees that the locality is not an appropriate location for future growth.

The proposed bridge is not seen by Council as the means to appropriately address the existing traffic issues, let alone the future traffic scenario with an additional 2,500 residents (see Traffic and Transport section below).

URBAN DESIGN

Historical context

The existing controls for the portion of the Wentworth Point area affected by this proposal are held in the *SREP* with more detail in the Homebush Bay West DCP (2004) and the No.1 Burroway Road DCP (2006). These controls are underpinned by urban design philosophy held in the Homebush Bay West Structural Design Framework (HBWSDF) prepared by the then Department of Infrastructure, Planning and Natural Resources (July 2003).

The HBWSDF provides a clear planning framework and urban design principles that underpin and are carried over into the vision held in the HBW DCP. These are also tailored around the proximity of the Millennium Marker.

Council believes the Wentworth Point peninsula is better suited to the scale of development as espoused in the HBWSDF because of its position and topography, flooding, traffic constraints and potential climate change impacts (see Climate Change section below). Furthermore, the proximity of the Rhodes peninsula is not a strong urban design case to justify a similar proposal at Wentworth Point.

Urban Design Justification

The proponent does not provide an urban design case for increasing the building envelope controls. Rather, it uses the sole reason as to fund the bridge. There are no new urban planning framework or urban design principles that would underpin the new vision. Thus the proponent's urban design justification falls well-short of any robust urban design review for the peninsula.

TRAFFIC AND TRANSPORT

Id.consulting was commissioned by Council to undertake population forecasts for the entire LGA at suburb level. Under the current building envelope controls, as per the HBW and No.1 Burroway Road DCPs, the population growth at Wentworth Point is forecast to grow to from 3,528 persons in 2011 to 12,924 persons by 2031. This rate of growth is expected to have a substantial impact on the local traffic environment both at Wentworth Point particularly at nearby pressure points such as the intersection of Bennelong Parkway and Hill Road. (This intersection is proposed to be signalised in the near future. Furthermore, the approaches at this intersection will need four lanes (2-lanes in each direction) based on the present projected traffic generation in the future without having regard to the additional 120,000sqm).

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The proposed increase in approximately 120,000sqm of additional floorspace is estimated to increase the above projected growth by an additional 2,448* persons (at the minimum) which will bring total growth to Wentworth Point to at least 15,372 residents. This figure will present greater challenges to the capacity of the road network especially at the intersections. Council estimates that the extra 1,200 or so dwellings brought about by the proposal will generate over 600 Veh/hr in the peak hours which need to be accommodated by local intersections. This additional traffic will have a severe impact on the proposed roundabout at the intersection of Hill Road and Baywater Drive.

*Note: calculated at 1,200 additional units with an occupancy rate of 2.04 persons per household.

While the Homebush Bay bridge proposal provides for public transport services, there is no evidence or commitment from the State Transit Authority to increase the service levels to the area. While it is expected that a proportion of residents will use public transport to Rhodes Station to access trains, there are indications that RailCorp has no spare capacity to take the expected patrons out of the Rhodes peninsula. In view of the above, any assumptions made as to the proportion of residents changing to public transport will need to be well substantiated.

The following additional considerations should be noted:

- The bridge width is questionable. The need or otherwise for passing lanes or waiting area and capacity considerations doesn't appear to have been considered appropriately.
- There needs to be proposed traffic management measures on both ends of the bridge to prevent simultaneous two way movement on the narrow bridge.
- There is no discussion about the impact on parking in the vicinity and the need or otherwise of commuter parking facilities on both ends of the bridge particularly on the Wentworth Point side.
- It is not clear what the links are of existing pedestrian path and cycleway networks to the bridge.

Because of the envisaged negative traffic impacts brought about by this proposal, Council sees that a commitment from the RTA, STA and/or Veolia along with allocated state government is critical before Council would be willing to reconsider a new growth vision for this locality.

CLIMATE CHANGE

There is no apparent consideration of potential sea level rise of the proposal, nor on the design of the proposed bridge and public space around the landing areas of the bridge. This is paramount given the recent Climate Change Study prepared by the Coast and Climate Change Council for the Federal Department of Climate Change and Energy Efficiency which has released high-resolution maps illustrating the areas potentially affected by sea-level rises. Low-lying coastal areas facing significant danger of inundation, or other problems associated with rising sea levels, threaten the planned homes and infrastructure over the proponent's land particularly when observing the forecasted 80 cm and 110cm sea-level rises.

EXPECTATIONS / VIEWS OF THE WENTWORTH POINT COMMUNITY

Council is not aware of the degree (or not) of the Wentworth Point Community's support for the proposal. While there have been numerous statements from the proponents about having the local

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community's support, without having spoken to or consulted with the community, Council does not necessarily accept this view.

The Community Reference Group has been established by the proponents for the purposes of the Homebush Bay Bridge Project. At this stage, Council is not aware whether there have been any significant discussions on the proposed increases to the building envelope controls.

COMMENTS IN RELATION TO THE PROPOSED BRIDGE

Council appreciates the Department of Planning has invited Council to make a submission on the proposed expansion of the controls. However, Council also provides the following comments on the Homebush Bay Bridge Project which is subject to a Part 3A application. This is because the proposed planning proposal cannot be considered in isolation from the Bridge proposal because the two are tightly linked.

Robust Economic Analysis

Council has not viewed any economic analysis which illustrates the financials in relation to the increase of 120,000sqm and its relationship with the proponents' \$40 million capped contribution for the delivery (construction) of the bridge.

Council must be able to have some form of economic analysis that expressly details the financial benefits and costs of the bridge and the planning proposal.

Estimated Cost of the Bridge

The proponent's estimated cost of the bridge (which is capped at \$40 million, as per the Summary VPA) appears to be too low. Council believes the total cost of the bridge to be, at least, in the order of \$60 million. Therefore, as part of progressing this proposal (both the bridge and the planning proposal), Council must (at the proponents expense) commission a quantity surveyor to estimate the bridge's total construction costs (including all contamination remedial work) in order to be satisfied that the \$40 million cost estimate is sufficient to meet the full construction cost. Council fears that if the VPA caps the developer's contributions to a mere \$40 million and does this with no clear arrangements in the event total construction costs exceed this amount, then the bridge will not be realised.

Voluntary Planning Agreement

The proponent is yet to submit a formal Voluntary Planning Agreement (VPA). To date, a summary VPA document has been prepared but it does not sufficiently detail the arrangements to be made in the final VPA.

Section 3

It is clear in the summary VPA that Council is not intended to be a party of the VPA nor is Council to be part of the process in finalising the VPA. Council believes it is critical it must be a party to the VPA and VPA process for the following reasons:

Application of the Agreement:

- To contribute to the drafting of the statement regarding the application of the agreement. (This could include matters such as to which land the VPA applies to, the dedication of land and the development and the proposal to increase the development controls, etc).

Developer obligations:

- To determine the developer contributions and the agreed terms under such matters (including the appropriateness of a capped contribution);
- To determine the Development Contributions Security and the terms under such matters;
- To determine whether the dedication of land or development/facility is appropriate and if so, the terms under such matters;
- To determine if any embellishment work is appropriate and if so, the terms under such matters;
- To determine the party responsible for the construction of the bridge (which would be the proponents); and
- To determine the terms and conditions should the developer not comply with the VPA.

Release of Security:

- The terms relating to the release and return of Development Contributions Security.

Application of the s94, s94A and s.94EF of the Act

- To determine the terms relating to the inclusion / exclusion of s94 of the Act;
- To determine the terms relating to the inclusion / exclusion of s94A of the Act; and
- To determine the terms relating to the inclusion / exclusion of s94EF of the Act.

Status of the Agreement

- To determine the terms relating to the status of the agreement.

Procedures:

To determine the procedures relating to:

- The payment of the proponent's contributions to fund the bridge;
- The payment of monetary development contributions;
- Who will build the bridge (at present, the Summary VPA does not stipulate which party is responsible for building the bridge);
- The maintenance of the Homebush Bay Bridge; and
- The dedication of land or a facility, should this occur.

As stated above, the issue of the capping of the proponent's contribution to the cost of the bridge at \$40 million (as per the Summary VPA) creates a great risk to Council, the Wentworth Point

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community and surrounding residents and businesses. Should the cost of the bridge be higher than the capped amount it is not clear in the Summary VPA who will wear the cost.

Council is very concerned that it may find itself in a situation where the proponents realise the increase floorspace – as per the proposed planning proposal vision – but see no bridge built because of the current terms of the Summary VPA. Therefore, Council must be a proponent of the VPA to as to secure an appropriate outcome for the Wentworth Point Community and the Auburn community as a whole.

Should you have any queries in relation to this submission, please do not hesitate to contact Jacky Wilkes, Executive Planner on 9735 1310.

Yours faithfully,

MARK BRISBY
DIRECTOR PLANNING AND ENVIRONMENT

cc. Peter Goth, Executive Director
South West Region
Level 3,
3 Marist Place
PARRAMATTA NSW 2150

Ursula Lang, Executive Planner / Place Manager for Rhodes Peninsula
City of Canada Bay Council
Locked Bag 1470
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In reply quote: T-14-23

The Hon Brad Hazzard
Parliament of New South Wales
Minister for Planning and Infrastructure and
Minister assisting the Premier on Infrastructure NSW
Level 33, Governor Macquarie Tower
1 Farrer Place
SYDNEY NSW 2000

Contact Name: J Wilkes - 9735 1310

TRIM No: T031417/2011

17th May 2011

Dear Minister Hazzard,

**SUBJECT: AMENDMENTS TO THE STANDARD INSTRUMENT TEMPLATE AND
TRANSITIONAL ARRANGEMENTS FOR AUBURN LOCAL
ENVIRONMENTAL PLAN 2010**

Council, at its Ordinary Council Meeting on April 20, 2011, resolved:

"That Council urgently seek a meeting with the Minister for Planning and the Department of Planning, in order to seek a review of the Wentworth Point (Homebush Bay) Master Plan and DCP. This should also include the incorporation of these instruments into Auburn LEP 2010"

Council has completed its Standard Instrument based comprehensive local environmental plan entitled *Auburn Local Environmental Plan 2010* (or "*Auburn LEP 2010*"). The *Auburn LEP 2010* was gazetted year on October 29, 2011.

The preparation of the *Auburn LEP 2010* involved incorporating the controls at Wentworth Point (formerly known as Homebush Bay West). The controls are held in the following instrument and plans:

- *Sydney Regional Environmental Plan No.24 – Homebush Bay Area*
- Homebush Bay West DCP (June 2004)
- Homebush Bay West – Wentworth Point Master Plan (October 2005)
- No.1 Burroway Road DCP (November 2006)

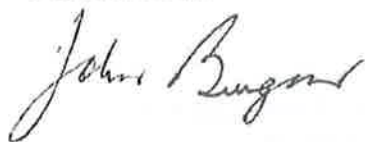
However, in August last year, the Department of Planning ("the Department") notified Council of its intentions to defer the integration of the Wentworth Point controls into the instrument because it was keen to see the instrument gazetted as soon as possible. The Department explained the gazettal would be delayed if it continued with the integration of the controls.

However, this view was a surprise to Council at the time because the Department had and still does consistently call for simplification of the planning system through the standard instrument. The deferment has meant that the Wentworth Point area is currently a 'Deferred Matter' in *Auburn LEP 2010* until the controls are brought into the instrument and development assessments can be assessed under one plan – *Auburn LEP 2010*.

Council, represented by the Mayor Councillor Ouelk and myself, would like to meet with yourself to discuss expediting the integration of Wentworth Point controls into the *Auburn LEP 2010*.

Should you have any queries in relation to the above, please do not hesitate to contact me on 9735 1203.

Yours faithfully,

A handwritten signature in cursive script, appearing to read 'John Burgess'.

JOHN BURGESS
GENERAL MANAGER