



Council of Social Service of New South Wales

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Mr Paul Kennedy
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Dear Mr Kennedy

The Council of Social Service of NSW (NCOSS) is the peak body for the social and community services sector in New South Wales. NCOSS works with its members on behalf of disadvantaged people and communities towards achieving social justice in NSW.

NCOSS welcomes this opportunity to comment on the draft *Revitalising Parramatta City Centre Plan* (the draft Revitalisation Plan), released in December 2006. In doing so we appreciate that the Revitalisation Plan is the product of genuine collaborative work between the Council and the State Government.

Parramatta has of course long been designated by the NSW Government as Sydney's second CBD. The most recent Metropolitan Strategy, *City of Cities: a Plan for Sydney's Future (2005)*, designates Parramatta, along with Liverpool and Penrith, as one of three regional cities that are planned to provide for more lifestyle and work opportunities close to those parts of the Sydney that are experiencing the most rapid and sustained population growth. Because of this the draft Revitalisation Plan has implications that go beyond just the local area. In particular it provides for jobs and dwelling numbers in the Parramatta CBD by 2031 to increase by 30,000 and 9,000 respectively. This represents 85% of the new jobs target and 9.5% of the new dwellings target set out in the Metropolitan Strategy for the West Central sub-region, which includes the Parramatta LGA.

The draft Revitalisation Plan contains a wide range of proposals. NCOSS would like to confine its comments to the issues of job targets, affordable housing and public transport enhancements.

Job targets

Action to generate more jobs closer to home is central to the achievement of the objectives of both the Metropolitan Strategy and the NSW State Plan.

We note from the draft Revitalisation Plan that the Parramatta CBD workforce is currently estimated to be 39,000. At the time of the 2001 Census the largest concentrations of employment were in finance and business services (14,000), retail (5,000), government administration (4,000), health and community services (2,600), accommodation and cafes (1,600) and education (1,000).

There is a degree of ambiguity about what the proposed 2031 jobs target is. While the Metropolitan Strategy appears to assume a job target of 60,000 (or an increase of 21,000), the draft Revitalisation Plan indicates that the current rate of growth could see actual job numbers reach 69,000 by 2031 (p. 45). This would require an increase of 30,000 jobs over 25 years. As this is the jobs growth figure quoted in a number of places, it appears that a target of 69,000 jobs by 2031 has now been adopted by Council and the Department of Planning.

It will obviously be necessary for an active economic development strategy to be put in place to meet such a target. The completion of the current Justice Precinct development followed by the planned relocation of the headquarters of Sydney Water will undoubtedly generate a substantial increase in Parramatta's government administration workforce in the near future. The challenge will be to then generate substantial additional employment in other industry sectors through the Civic Place and other developments.

NCOSS believes it is also important to continually monitor trends in the type of jobs that are being attracted to Parramatta CBD. We acknowledge that Council has a longstanding interest in this issue, as evidenced by the very detailed data on industry sectors and occupational categories that is included in the draft Revitalisation Plan. NCOSS suggests that this information should be complemented by tracking trends in full-time employment and knowledge-related jobs.

Affordable housing

NCOSS is particularly keen to ensure that the Revitalisation Plan includes provision for affordable housing. It is well documented that low to moderate income households in Sydney are experiencing increasing housing affordability problems and that the supply of low rent private rental stock for low income households has been declining in both relative and absolute terms. The State Government's own figures show that there are some 175,000 low to moderate income households in Sydney in housing stress, in that they spend more than 30% of their income on housing costs. This group comprises 115,000 private renters and 60,000 home purchasers.

We are extremely disappointed that Action Item 16 of the draft Revitalisation Plan simply raises the need to develop a process for incorporating affordable housing within the city centre (p. 88). No reference is made to any specific timeframe, target or implementation mechanism for doing so.

NCOSS notes that on 9 December 2003 Council adopted a draft Parramatta Affordable Housing Scheme that unfortunately did not receive the necessary approval of the Minister for Planning. The Scheme provided for Council to levy developers the equivalent of 3% of the residential floor space area of all new medium to high density residential and mixed use developments in Council's area.

Council justified the draft 2003 Scheme on the basis that:

“while land owners have benefited from increases in land value from the rezoning of land for higher density residential development, the increases in land value have clearly had (and will continue to have) an impact on the affordability of housing, especially for very low to moderate income households....Without measures to provide more affordable housing, Council is concerned that the market will continue to produce more expensive housing, so that housing will only be affordable to households on relatively high incomes. This would result in existing lower income

groups having to move out of Parramatta, and further away from the significant range of services provided in the LGA. Current and new lower income households would clearly be prevented from finding reasonably priced rental accommodation” (draft *Parramatta Affordable Housing DCP*, December 2003 p.5).

NCOSS considers that the case for putting in place measures to deal with housing affordability for very low, low and moderate income households is even stronger now than it was in 2003. We would strongly urge Council to make a further attempt to persuade the Government to agree to a system of inclusionary zoning for affordable housing in Parramatta. In this regard we note that the Government has recently placed on exhibition a draft Affordable Housing Contributions Plan for Redfern Waterloo and that the Minister for Planning has entered into a voluntary planning agreement on affordable housing with the owner of the CUB site at Chippendale.

NCOSS recommends that the final Revitalisation Plan should provide for a Parramatta CBD Affordable Housing Scheme to be in place by the beginning of 2008. Our preferred position would be for 10% of the new dwellings arising from the Revitalisation Plan to be designated as affordable housing. If adopted, this would generate approximately 900 units of affordable housing over the next 25 years. This would enable the Parramatta CBD to grow and develop as a diverse and sustainable community that is home to a range of household types, incomes and age groups. It would also allow an increased number of low income workers, such as retail, hospitality and office support staff, to live within walking distance of work in the Parramatta CBD.

We believe that the inclusion of a more explicit process to develop and implement an Affordable Housing Strategy would strengthen the Revitalisation Plan and significantly contribute to the achievement of its objectives.

Public transport enhancements

Parramatta’s success as Sydney’s second CBD is dependent on substantial improvements in current levels of public transport usage. At present more than three quarters of all journeys to the Parramatta CBD are by car, with rail providing just 13% of total trips and buses just 3%. For work-related travel, cars account for 70% of journeys, trains 25%, and buses just 5% (p. 64).

While the draft Revitalisation Plan emphasises the need to encourage a shift from travel by cars to walking, cycling and public transport, NCOSS is concerned that no specific modal split target is proposed. We would support a medium term target of 40% of all work-related trips being by train or bus, increasing over time to 50%. By comparison 72% of all peak hour trips to the Sydney CBD are currently made by public transport, with the NSW State Plan committing the Government to increase this to 75% by 2016 (NSW State Plan p. 58).

The opening of the new railway station and interchange has reportedly led to a substantial increase in rail patronage, while the commencement of services on the new North West T-Way should add to existing bus services.

On the other hand, it was extremely disappointing and short-sighted for rail services on the Cumberland line to be substantially reduced when Sydney’s revised timetables were implemented. As a result people living along the Guildford-Fairfield-Cabramatta-Liverpool-Campbelltown corridor now only have two direct morning peak train services to Parramatta, and three return train services in the afternoon peak period. Otherwise they have to travel to

Granville and change trains, an inconvenience that clearly serves to discourage public transport usage. It must be a high priority to substantially increase Cumberland line services to rectify this unsatisfactory situation.

Action item 20 in the draft Revitalisation Plan proposes modest measures to improve the connection between the Parramatta CBD and the growing UWS campus at Rydalmere (p. 88). NCOSS is doubtful, however, that the suggested pedestrian and cycling links will have anything other than a marginal impact at best. In the medium term only the completion of the Parramatta to Epping rail link, which would enable for the first time direct train travel between Parramatta and Rydalmere stations, offers the prospect of providing an adequate public transport service between the two. Pending this, the frequency and capacity of bus services to and from the campus needs to increase substantially.

The draft Revitalisation Plan concedes that, until recently, Parramatta has aimed to encourage jobs and retail activities through the generous provision of car parking. As a result the Parramatta now has some 24,700 car parking spaces, two thirds of which are available for medium to long-stay purposes (p. 66). This has clearly contributed to the increasing level of congestion in the city centre during the day. NCOSS believes that the Revitalisation Plan needs to include a firmer strategy to reduce unnecessary car trips into the CBD during work hours and to contain the provision of onsite parking in future office and retail developments.

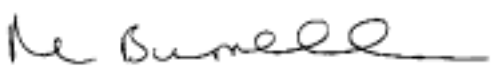
Specifically NCOSS would urge consideration of the following two options:

- a) *Review the operation of the NSW Government Parking Space Levy as it applies to the Parramatta CBD.* NCOSS has previously proposed doubling the applicable Parking Space Levy (PSL) rate for leviable areas in order to discourage the construction of new car spaces, and removing the PSL exemption granted to shopping centers in leviable areas outside of Sydney and North Sydney CBDs. Both these proposals would send a price signal to for car space owners in the CBD, and in the long run increase incentives to use public transport to Parramatta. Note that revenue raised through the PSL is hypothecated for expenditure on public transport infrastructure that aims to improve access to public transport (the Parramatta transport interchange was constructed using funds from the PSL levy fund).
- b) *Impose tighter controls on the ratio of newly constructed floor space in Parramatta CBD that is used for car parking,* to ensure a reduction over time in the proportion of useable space that is dedicated to car parking.

For further information

If you require any further information regarding this submission please do not hesitate to contact Warren Gardiner, Senior Policy Officer, on 9211 2599 ext 112 or email warren@ncoss.org.au

Yours sincerely



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