

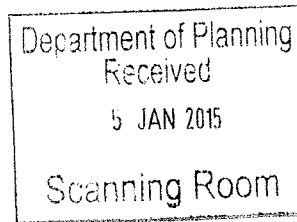
Appendix F State government agency submissions



Education &
Communities



Mr Michael File
Director Urban Renewal
Department of Planning & Environment
GPO Box 39
SYDNEY NSW 2001



DOC 14/623832

Dear Michael,

**Re: Exhibition of Parramatta North State Significant Site –
Proposed Changes to Parramatta LEP's**

I write in response to your request dated 19 November 2014 inviting the Department of Education and Communities (the Department) to comment on the above proposal.

The proposed project is within the North Parramatta Public School, Parramatta Public School, Northmead Creative and Performing Arts High School and Macarthur Girls High School catchments. All schools in the surrounding area are currently utilising all permanent classrooms and this is anticipated to continue into the foreseeable future.

The North Parramatta urban renewal proposes 4,100 additional dwellings staged over a 15-20 year period. The Department is also aware of other developments occurring in the vicinity of this project and will monitor production and take up rates across this and other developments. The cumulative impact of these developments will significantly increase education demand in the future, requiring significant investment in new education infrastructure.

The scale of this development may instigate the provision of a new primary school within or adjacent to the Parramatta North development precinct and the Department will continue planning with Urban Growth and other Government agencies.

This urban renewal project raises a number of matters relating to school education needs and opportunities which the Department is interested in examining further with Urban Growth NSW and the Department of Planning and Environment as outlined below.

Land Use Planning

When considering significant land use changes such as those proposed for Parramatta, the Department encourages planning authorities to account for education infrastructure and allow for the lead time required to plan and build new education infrastructure.

The challenge for the Department is to plan for the expected increase in student population arising from major urban renewal projects, in a balanced and affordable way. The Department encourages the broader State planning system to be supportive of land use development policies that help address these pressures. The Department is therefore supportive of a shift in planning policies which will encourage:



- Optimizing the size, amenity and function of existing schools so that they afford greater choice and provide contemporary teaching spaces for students
- Facilitating out of hours shared use of educational facilities such as ovals and halls
- The removal of planning policy barriers to school development
- The construction costs of additional teaching spaces to be funded from developer contributions
- Land dedications and appropriate rezoning in areas where new schools are required
- Streamlined planning approvals for new education infrastructure

Education Needs Associated with Additional New Housing Development

The development of 4,100 additional dwellings in North Parramatta is expected to generate further increases in student populations and demand for additional teaching spaces for Government schools in the locality.

Government primary and secondary schools around Parramatta are subject to projected increases in student populations over the short and long term future to at least 2026, and have limited capacity within existing school assets to meet projected demand beyond the short term.

The Department is currently developing a number of planning strategies to meet projected demand from student population growth in primary and high schools in the Parramatta and Holroyd LGA's to at least 2026. The first of these planning strategies will address schools in close proximity to the north of the Parramatta CBD including the North Parramatta urban release area.

Education Opportunities Presented by Urban Renewal

The Department is keen to further examine opportunities presented by the North Parramatta Urban Renewal project for strengthening the provision of primary and secondary school education in the Parramatta area. In particular, we are interested in the opportunities for new or expanded school property assets including:

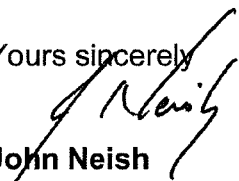
- Opportunities on Government land in the area as options for new or expanded secondary school/s in the Parramatta area
- Opportunities for Government to capture the uplift in property values brought about by changes to planning rules in order to assist the funding of additional educational infrastructure

I trust the above information is of assistance. We look forward to working with you further on education needs and opportunities associated with the North Parramatta Urban Renewal project. Please contact Lesley Moodie, Senior Asset Planner on 9561 8255 or email lesley.moodie2@det.nsw.edu.au for further information.



Education &
Communities

Yours sincerely


John Neish
Director, Planning and Demography
16 December 2014



Office of
Environment
& Heritage

Our reference: DOC14/278368
Contact: Rachel Lonie 9995 6837

Mr Michael File
Director Urban Renewal
Planning and Environment
GPO Box 39
Sydney NSW 2001

Dear Mr File

Reference is made to your correspondence dated 19 November 2014, regarding the exhibition of the Parramatta North potential State Significant Site.

The Office of Environment and Heritage (OEH) provides comments on biodiversity, Aboriginal cultural heritage and flood risk management in Attachment 1.

Should you have any queries in regard to this correspondence please contact Rachel Lonie on 9995 6837 or by email at rachel.lonie@environment.nsw.gov.au

Yours sincerely

S. Harrison 19/12/14

SUSAN HARRISON
Senior Team Leader Planning
Greater Sydney
Regional Operations

ATTACHMENT 1

Office of Environment and Heritage (OEH) comment on North Parramatta potential State Significant Site

1. Biodiversity

OEH is very concerned that the proposal's proximity to the Grey-headed Flying Fox (GHFF) camp will create future conflicts with residents. A number of GHFF camps in Sydney which are adjacent to residential areas are currently under threat of dispersal. It is unclear why discussion of such a potentially significant impact is not discussed in the Ecological Assessment, but is included in the Ecological Management Plan (EMP). OEH agrees with the statement in section 4.1 of the EMP, that a 300 m buffer between residents and the GHFF camp at this location is not practical, however the proposal does not appear to provide for any buffer. Furthermore, while OEH supports increasing the width of potential habitat through regeneration and recreation of the River-flat Eucalypt Forest (as described in the EMP), this is likely to exacerbate conflicts as it will bring habitat closer to the development areas and over a wider area.

Section 4.1 of the EMP states that conflicts will be minimised by the existing brick wall. However, OEH does not consider that the brick wall (which appears to be approximately 2m high), will sufficiently address the conflict issues, as both the roosting height and the proposed building height (either 13m or 22m as maximum height, according to Figure 10 in the Planning Report) will be significantly higher than the wall. Section 4.1 of the EMP also states that the majority of higher yield residential dwellings have been situated further away from the camp boundaries. However, OEH does not consider that any development in close proximity to the camp is appropriate. A buffer of at least 20m (preferably vegetated with tall, fragrant, non-roost trees) should be provided between GHFF habitat (including proposed regeneration areas) and development areas.

The surveys that were undertaken for threatened microbats did not include surveys of the buildings, which can occasionally be used by microbats as roosts. It will be important that thorough surveys are undertaken by a suitably qualified ecologist prior to destruction of any buildings that may contain roosts.

Section 18.3 of the Planning Report suggests that an asset protection zone (APZ) will not be required between areas of existing and regenerated River-flat Eucalypt Forest (RFEF), and development areas. OEH notes there is no discussion of an APZ in the Ecological Assessment or the EMP. If an APZ is required in future, an assessment will need to be undertaken of the impact of the creation and maintenance of the APZ, on the RFEF and potentially the GHFF camp.

Section 4.1 of the EA states that 'the shared path will be constructed outside of the GHFF camp boundary', however, Figure 16 of the Planning Report shows a 'proposed shared way' through the area where the GHFF camp is located. OEH recommends that no pathways are constructed in this area.

OEH notes that the 'bat colony' on Figure 15 of the Planning Report is a smaller area than the map of the GHFF camp in Figure 5 of the Ecological Assessment.

2. Aboriginal Cultural Heritage

OEH has reviewed the *'Parramatta North Urban Renewal Cumberland East Precinct and Sports & Leisure Precinct Aboriginal Archaeological & Cultural Heritage Assessment'* prepared by Comber Consultants for Urban Growth NSW (October 2014) and can advise the following.

In broad terms the archaeological assessment has provided an adequate consideration of the pre-contact archaeological potential likely to exist within the North Parramatta Urban Renewal Precincts (NPURP). It has provided a detailed discussion of early occupation and interactions of Aboriginal and non-Aboriginal people within the broader Parramatta area and township south of the Parramatta River.

However, relevant discussion of post-contact land use and disturbance within the precincts should be incorporated from the Historical Archaeological assessment undertaken for the NPURP. This should be used to guide any program of test excavation of the potential and likely Aboriginal archaeological resource across all precincts which are likely to be developed.

The Aboriginal community consultation undertaken is insufficient in its current form. It does not comply with the OEH Guideline *Aboriginal Cultural Heritage Consultation Required for Proponents 2010*. In addition, the consultation has not adequately considered the cultural and social significance of all the precincts to the Aboriginal community in order to inform the development planning for these precincts. In particular, consultation was not undertaken for the Sport & Leisure and Cumberland precincts. Many of the built heritage items within the precincts will retain multiple significance values within the broader NSW community which are likely to encompass values to the Aboriginal community, including contemporary experiences which are relevant to understanding and interpreting these histories.

OEH supports the recommendations of the Aboriginal community consulted who have identified high cultural and social values associated with Parramatta Park and in particular have highlighted the importance of ensuring:

"Parramatta Park (is) maintained as green open space for recreational purposes. They would also like to ensure that view lines to and from the park are maintained and that high density, high rise development does not occur on the boundaries of the Park" (AACHA 2014:16)."

OEH notes that this consultation also identified the value in ensuring the reduction of development heights in proximity to Parramatta River and the inclusion of a riparian corridor along the River-frontage. OEH also draws attention to the implications of any encroachment of development within these open space areas for activities which may cause harm to Aboriginal archaeological objects within these areas such as service installation and pathways.

OEH recommends the following key areas that need to be addressed prior to finalising the development design for this planning proposal:

1. There is a need for further Aboriginal community consultation in accordance with the OEH Guideline *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010*;
2. The views of the Aboriginal Community should be incorporated into the results of the development design and subsequent interpretation plans for the NPURP project.
3. Further research and documentation of the social and cultural heritage values of sites within the Cumberland East Precinct and Sports and Leisure Centre Precinct should be included into the Archaeological Assessment;
4. Information on post-contact land use and disturbance from the Historical Archaeological assessment within the precincts should be incorporated into the Aboriginal assessment. This should assist interpreting the survival of Aboriginal archaeological evidence across the development precincts and guide any testing program prepared;
5. An Aboriginal Heritage Impact Permit (AHIP) will be necessary to undertake test excavation and geotechnical boring as these activities are not excluded from the definition of harm as specified by Requirement 14 of the *Code of Practice for Archaeological Investigation in NSW (2010: p24-25)*: 'in areas known or suspected to be conflict or contact sites'; and
6. Testing should be undertaken well in advance and inform the development design of the precincts.

OEH understands that test excavation is currently proposed for historical archaeology within the first quarter of 2015. OEH recommends that it would be advisable to have an AHIP application approved prior to commencing any historical archaeological testing program to avoid delays during this program should Aboriginal objects be identified during these works. In order to obtain an AHIP for testing approved development consent is not required, however Aboriginal community consultation must be undertaken in accordance with the Guidelines specified in Point 1 above and appropriate documentation in accordance with the *Applying for an Aboriginal Heritage Impact Permit: Guide for applicants (2010)*.

7. Flood Risk Management

OEH previously recommended that the most appropriate method to assess the development of flood prone land is through the floodplain risk management process which is detailed in the NSW Government's *Floodplain Development Manual* (2005).

OEH recommended that a flood assessment should be undertaken in consultation with Parramatta Council and comprise:

- the impact of flooding on the proposed development and any flood risk to people and properties for the full range of the floods up to the probable maximum flood (PMF) event including potential long term cumulative impacts from staged development. This assessment should address any relevant provisions of the NSW Floodplain Development Manual (2005) including the potential impacts of sea level rise and increases in rainfall intensity due to climate change.
- details of the drainage associated with the proposal, including stormwater drainage infrastructure. The proposal should address the impact of stormwater flows on the site from other catchments, overland flow paths and mainstream flooding.
- an assessment of any possible impact of the proposed development on the flood behaviour (i.e. levels, velocities and duration of flooding) and the impact of the proposed development on adjacent, downstream and upstream areas.
- an assessment of the impacts of earthworks and filling of land within the proposed development. This assessment should be based on an understanding of staging development and cumulative flood impacts.
- a detailed emergency response plan for floods up to the PMF level. This plan should also include shelter-in-place arrangements, an adequate assessment of isolation possibility and the impacts from the proposed development on the capacity or operation of existing local evacuation routes.

OEH notes that these recommendations have not been taken into consideration.

(END OF SUBMISSION)



Office of
Environment
& Heritage

Our reference: DOC15/37948
Contact: Rachel Lonie 9995 6837

Mr Michael File
Director Urban Renewal
Planning and Environment
GPO Box 39
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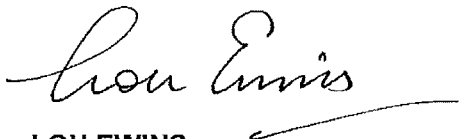
Dear Mr File

Reference is made to your correspondence dated 4 February 2015 regarding consultation in accordance with Section 34A of the *Environmental Planning and Assessment Act 1979* of the Parramatta North potential State Significant Site.

The Office of Environment and Heritage (OEH) provided comment on biodiversity issues associated with this proposal in its submission dated 19 December 2014. Additional comments are provided at Attachment 1 pursuant to the Section 34A.

Should you have any queries in regard to this correspondence please contact Rachel Lonie on 9995 6837 or by email at rachel.lonie@environment.nsw.gov.au.

Yours sincerely

 17/2/15

LOU EWINS
Acting Regional Manager, Greater Sydney
Regional Operations

Enclosure: Attachment 1 – Office of Environment and Heritage (OEH) response on Section 34A consultation for North Parramatta potential State Significant Site

ATTACHMENT 1. Office of Environment and Heritage (OEH) response on Section 34A consultation for North Parramatta potential State Significant Site

1. Grey-headed Flying Fox Colony

OEH re-iterates its concerns regarding the proximity of the proposal to the Grey-headed Flying Fox (GHFF) camp and notes that this will create conflict with future residents. Conflicts between GHFF and residents are real and expensive to address, as OEH's experience with existing GHFF colonies that are located close to residential areas demonstrates. Conflicts arise as a result of noise and odour impacts and the perceived and potential health impacts of GHFFs. By far the best strategy is to avoid creating the conflict in the first place, which can be achieved by creating an appropriate buffer between residents and the GHFF colony.

In reviewing the documents provided, OEH notes that the only diagram that appears to overlay the location of the GHFF camp and the proposed development is labelled *Key constraints* in the Summary Report (November 2014). The diagram titled *Proposed built form controls* in the Summary Report shows a new 3 storey building in the area of the GHFF camp and a further new 3 storey building and a new 4-6 storey building close to the camp in the area labelled F7.

OEH accepts that a 300 m buffer between residents and the GHFF camp at this location is not practical; however the proposal does not appear to provide for any buffer. OEH has recommended that a buffer of at least 20 metres (preferably vegetated with tall, fragrant, non-roost trees) be provided between GHFF habitat (including proposed regeneration areas) and future development areas. OEH also supports increasing the width of potential habitat through regeneration and recreation of the River-flat Eucalypt Forest as described in the Environmental Management Plan (EMP), noting however this is likely to exacerbate conflicts with GHFF as it will bring habitat closer to the development areas and over a wider area.

OEH supports the recommendation made by Parramatta City Council in its submission on the proposal to relocate buildings away from the open space areas in order to reduce current and future environmental health conflicts with the GHFF camp. OEH also supports Council's recommendation that the GHFF camp area be included in the *Natural Resources – Biodiversity Map* in the Parramatta Local Environmental Plan 2011.

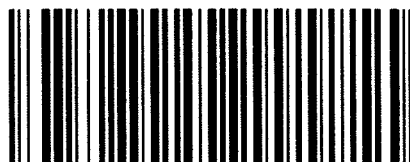
OEH considers any remnants of the endangered ecological community, River-flat Eucalypt Forest (RFEF), should be retained and impacts on this community avoided. The current proposal does not meet the setbacks required by the NSW Office of Water under the *'Guidelines for riparian corridors on waterfront land'*. OEH considers the areas required as a setback should not include buildings, carparks or other infrastructure, but should retain, regenerate and replant RFEF where possible.

A potential new pedestrian/cycle bridge is shown bisecting the GHFF camp. OEH strongly recommends that no pathways are constructed through the GHFF camp area. The Landscape Plan shows a 'heritage terrace' element within the GHFF camp. Again, the location of this should be reconsidered to avoid the camp and future GHFF conflicts and impacts.

2. River-flat Eucalypt Forest

As noted in the previous submission, Section 18.3 of the Planning Report suggests that an asset protection zone (APZ) will not be required between areas of existing and regenerated River-flat Eucalypt Forest and development areas. OEH notes there is no discussion of an APZ in the Ecological Assessment or the EMP. If an APZ is required in future, an assessment will need to be undertaken of the impact of the creation and maintenance of the APZ, on the River-flat Eucalypt Forest and potentially the GHFF camp.

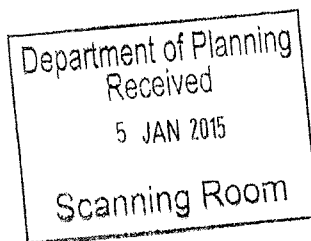
Future consideration of threatened species matters will be required as the proposal is developed and impacts such as loss of hollow bearing trees and GHFF feed trees are better understood. As noted previously, future surveys of the buildings will be required for threatened microbats. It will be important that thorough surveys are undertaken by a suitably qualified ecologist prior to destruction of any buildings that may contain roosts.



PCU057688

Our reference: EF14/25540:DOC14/278996-02:PW
Contact: Paul Wearne (02) 4224 4100

Department of Planning and Environment
(Attention: Anna Johnston/Emma Hichens)
GPO Box 39
SYDNEY NSW 2001



Dear Ms Johnston and Ms Hichens

PARRAMATTA NORTH URBAN RENEWAL PRECINCT

I am writing to provide comment on the exhibited Planning Report and associated studies in relation to the Parramatta North Urban Renewal (PNUR) Precinct received by the Environment Protection Authority (EPA) on 19 November 2014.

The planning report states that the proposed PNUR will involve the renewal of a 146 hectare area to provide the creation of a heritage mixed-use precinct, provision of new housing (approximately 4,100 homes) and employment opportunities (approximately 4000 new jobs), community and cultural spaces including a Sport and Leisure Precinct. It is also supported by the *Draft Sydney Metropolitan Strategy* and recognised as an urban renewal opportunity for the Sydney Greater Metropolitan Region (GMR).

On the basis of a review of the submitted information the EPA considers that this information has not adequately addressed a number of issues raised in our response dated 29 September 2014. The EPA considers the issues and information provided in the EPA submission still important and should be considered by Department of Planning and Environment (DPE) in its assessment and determination of the proposal. The EPA has provided further information in the attached comments (Attachment A) for DPE's consideration. These relate to:

- Noise
- Water Quality
- Waste Management
- Contaminated Land Management.

The EPA is able to meet with DPE at a mutually convenient time to discuss any of the above issues. If you have any questions regarding this matter, please contact Mr Paul Wearne on (02) 4224 4100.

Yours sincerely



24/12/2014

GREG SHEEHY
Manager Sydney Industry
Environment Protection Authority

Att

ATTACHMENT

1. NOISE

The following outcomes should be included in the proposed State Environmental Planning Policy (SEPP):

- to provide strategies at a local level to ensure noise emissions do not cause adverse impacts upon wellbeing and amenity
- to avoid land use conflict.

Matters for Consideration

The Planning Proposal indicates that the proposed PNUR precinct will include:

- transformation of the sports and leisure precinct into an entertainment destination for Western Sydney supported by 34,000m² of mixed use, predominantly commercial space
- around 4,100 new dwellings
- nearby buildings up to four to eight storeys and in the vicinity buildings of 12 to 30 storeys.

The EPA advised in its response dated 29 September 2014 that there are a range of noise issues associated with the operation of entertainment venues which can result in land use conflict, especially where they adjoin residential communities. In particular sustainable land use planning involving the careful siting and design of sensitive land uses and the management of existing noise sources at entertainment precinct will lead to the best environmental outcome. This, due to the potential to address noise issues retrospectively may not be viable, is usually limited and more expensive.

The EPA also recommended in its response that the planning proposal should:

- *Detail and provide justification for the mix and location of proposed and existing land uses having specific regard to acoustic compatibility between noise generating and noise sensitive land uses.*
- *Provide draft zoning and planning controls to amend the Parramatta LEP including height, FSR, heritage and noise compatibility requirements to ensure that potential noise related land use conflicts are identified, and were necessary addressed at the design and construction stage of development. This should include measures to ensure that purchasers of residential premises are aware of the mixed use nature of the zoning and the potential for legitimate noise generating activities to be audible and potentially impinge on their acoustic amenity.*

The submitted Planning Report only considers noise from road and rail sources as required by the Infrastructure SEPP. It states that:

"Where relevant, future development applications will be required to address and satisfy noise and vibration requirements for development in the vicinity of transport corridors".

The EPA advises that land incompatibility issues should not be left to a post-approval phase but rather undertaken as part of the concept planning for the proposal to inform future development and ultimately the determination of the proposal. In particular, the EPA recommends the proponent should document information that details:

- How the leisure precinct and surrounding land uses will be designed to maximise noise mitigation at the planning stage
- How Venue NSW will manage the noise impacts from events at the sports and leisure precinct on surrounding residents.

The EPA also advised it may have an appropriate regulatory authority role under the *Protection of the Environment Operations Regulation 2009* for outdoor entertainment activities involving 200 persons or more that are carried on lands within the proposed sports and leisure precinct.

As discussed at meeting on 11 December 2014 with EPA and DPE regarding the proposal, the EPA recommends that an acoustic assessment should be undertaken to ensure potential noise conflicts and cumulative impacts are identified and managed appropriately, and used to inform the current rezoning and SEPP. In particular, the assessment should consider how the design and layout of the sports and leisure

precinct and the proposed surrounding land can maximise optimal noise outcomes. The acoustic assessment should also consider how noise from events at the sports and leisure precinct will be managed to minimise impacts on surrounding noise sensitive land uses.

Another key issue that needs to be understood as part of the assessment is documenting current noise management arrangements across the proposed sport and leisure precinct. At this time the EPA understands that Pirtek Stadium (former Parramatta Stadium) has an existing Noise Management Plan that is current to 2016. A copy of this plan should be included with the above acoustical assessment and be reviewed to ensure the plan is adequate and meets current contemporary noise requirements. It should also take into account as best as possible any future plans for types and frequency of events.

The EPA also understands that the current entertainment activities can also extend to the western side of the Parramatta River where open air concerts can occur. While this is outside the study area, it does recognise that the sports and entertainment precinct may be larger than presented in the planning proposal. It also acknowledges that Parramatta City Council also has a key role in the management of noise across this site that should also be investigated and understood as part of the acoustical assessment.

The EPA considers the outcomes of the above acoustical assessment will not only guide noise management associated with the proposed sport and leisure precinct but can also inform the development of specific noise provisions to be included in the *Parramatta DCP* (2011). In this regard, the EPA would like to work collaboratively with DPE, Pirtek and Venues NSW on these matters.

2. WATER QUALITY

The following outcome should be included in the proposed SEPP:

- *To provide a healthy water environment that includes restoring or maintaining the community's uses and environmental values of waterways through the achievement of relevant NSW Water Quality Objectives.*

Matters for Consideration

The EPA recommended in its response dated 29 September 2014 on key study requirements that the following studies should be undertaken:

- *Provide an assessment of any potential impacts of the proposal on the hydrology and hydrogeology of the urban renewal precinct and adjoining areas, with particular focus on water quality*
- *Provide details of, and an assessment of impacts of the proposal on watercourses, wetlands and riparian land on and adjoining the urban renewal precinct.*

A review of the supporting information reveals that no assessment of potential impacts of the proposal on water quality has been provided. In addition no detail or assessment of impacts of the proposal on watercourses, wetlands and riparian land on and adjoining the urban renewal precinct has also been provided. This is particularly important as the project will involve foreshore improvement works along the Parramatta River.

The EPA promotes development that maintains or restores the community's uses and values of waterways (including human and environmental health) through the achievement of relevant NSW Water Quality Objectives (WQO). The EPA considers that an important environmental outcome for the NPUR precinct is ensuring that the WQO developed for the Sydney Harbour and Parramatta River catchment are supported. In particular, Parramatta City Council has recently received an Estuary Management Grant to address key management actions in the Parramatta River.

The EPA considers it important that the proponent provide an assessment of any potential impacts of the proposal on the hydrology and hydrogeology of the urban renewal precinct and adjoining areas, with particular focus on water quality and the community's agreed environmental values and human uses for the relevant watercourses, also known as the NSW WQO.

The EPA also recommended the following plan should also be developed and included as part of the water studies.

- *Provide a concept stormwater management plan outlining the general stormwater management measures for the proposal, with particular emphasis on possible water sensitive urban design options.*

No concept stormwater management plan has been provided. The Planning Report states that stormwater concept plans will be prepared with future development. It also states that future development applications will be required to demonstrate that the proposed water management regimes meet the relevant assessment criteria.

The EPA understands that the Parramatta Development Control Plan (DPC) 2011 provides the general guidelines and standards for stormwater management that will apply for the development of the PNUR area. The PNUR areas will adopt the stormwater treatment targets of the Parramatta DCP, including: Gross Pollutants 90 per cent, Total Suspended Solids 85 per cent, Total Phosphorus 60 per cent and Total Nitrogen 45 per cent. That more appropriate and contemporary pollutant load reduction targets should be derived that reflect the water quality outcomes necessary to support the relevant environmental values of the receiving waterways and reflected in the DCP.

Integrated Water Cycle Management

The EPA encourages development that promotes integrated water cycle management to optimise opportunities for sustainable water supply, wastewater and stormwater management and reuse initiatives where it is safe and practicable to do so.

The EPA considers it important for the proponent to outline opportunities for the use of integrated water cycle management practices and principles to optimise opportunities for sustainable water supply, wastewater and stormwater management across the development.

The *Growth Centres State Environmental Planning Policy* also encourages water recycling and water reuse Initiatives. The EPA supports such initiatives, in particular proposed integrated approaches to managing sewage effluent and stormwater. The EPA also considers that there is considerable scope to apply such initiatives in the development of the urban renewal project.

The EPA recommends that the following provision be included in the Parramatta North Urban Renewal Special Precinct Provisions of the Parramatta DCP 2011. This has been sourced from requirements for other areas that are subject to specific precinct provisions under the Parramatta DCP 2011 (see sections 4.3.3.6 and 4.3.3.7).

Recycled Water

New developments should be connected to a source of recycled or reuse water wherever possible. Recycled/reuse water means treating and using water, such as sewage, stormwater, industrial wastewater or greywater, for non-drinking purposes such as for industry, toilets, cooling towers and irrigation of gardens, lawns, parks and crops.

Sewage Management

The EPA recommended in its response dated 29 September 2014 that details on the preferred approach to sewage management should be documented as part of the planning proposal. While the planning report states that the area is going to be connected to sewage, the EPA recommended the supporting information include details of sewage management and an assessment of any potential impacts on the community's uses and environmental values of waterways and public health.

In general sewage overflows can be a major contributor to diffuse source water pollution in urban environments. New urban developments need to consider the capacity of the existing sewage system to cater for additional load, including whether environmental performance will be compromised by the potential for increased sewer overflows and discharges from existing sewage treatment plants.

In particular, if increased loads of pollution on the receiving environment result from additional sewage capacity there needs to be identification of what practical and cost effective measures can be taken to maintain or restore the community's uses and values of waterways and protection of public health. This would include sewage overflows from any existing sewage pumping stations and discharges from any existing sewage treatment plant. The EPA's policy is that for new systems there should be no pollution of waters as a result of overflows during dry weather and that overflows during wet weather should be minimised.

The EPA recommends that further information should be sought from the proponent regarding the above matters. In addition the EPA also recommends the inclusion of the following note to alert determining authorities and proponents that EPA licensing may be required for the construction and operation of sewage infrastructure

Note: Any development proposing a new sewage treatment system or augmentation to an existing sewage treatment system licensed by the EPA (including construction of sewage reticulation) should investigate whether licensing is required under the Protection of the Environment Operations Act 1997.

3. WASTE MANAGEMENT

The following outcomes should be included in the proposed SEPP:

- *Provides sound waste management strategies at a local level which are implemented to achieve the NSW Waste Avoidance and Resource Recovery Strategy (WARR Strategy) addressing the waste management hierarchy of :*
 - *avoidance of unnecessary resource consumption*
 - *resource recovery (including reuse, reprocessing, recycling and energy recovery)*
 - *disposal*
 - *compliments NSW government's Waste Less, Recycle More initiatives and EPA waste and recycling programs.*

Matters for Consideration

The planning report states that waste management will be addressed to satisfy relevant EPA waste management requirements and any requirements of Parramatta City Council. The EPA considers that the NPUR provides an opportunity to enhance and update Parramatta City Council's DCP in relation to the management of waste. This will ensure that new development associated with the NPUR is guided by contemporary information to ensure sustainable waste management outcome. In this regard, the EPA recommends section 3.3.7 of Parramatta DCP be updated to include the following provisions:

- *Any waste generated during demolition and construction needs to be classified in accordance with the EPA's Waste Classification Guidelines and managed in accordance with that classification*
- *Waste management planning for the new development needs to consider the State Plan targets for waste reduction and resource recovery, along with any regional waste management strategies.*

In addition, the EPA recommends the Notes associated with the DCP provisions include the following under guidelines to assist the development of waste management strategies:

- *The Better Practice Guidelines for Waste Management and Recycling in Commercial and Industrial Facilities (EPA, December 2012). This guide can be accessed at: <http://www.epa.nsw.gov.au/warr/BPGuideCIFacilities.htm>.*
- *The Better Practice Guide for Multi-Unit Dwellings provides waste management strategies for multi-unit residential developments (DECC 2008). This guide can be accessed at: <http://www.epa.nsw.gov.au/warr/BetterPracticeMUD.htm>; and*
- *The Better Practice for Public Place Recycling (DEC 2005) provides information on standards for recycling systems in public places, such as parks, shopping centres, footpaths, bus-stops, etc. This guideline can be accessed at: <http://www.epa.nsw.gov.au/warr/publicrecycling.htm>.*

4. CONTAMINATED LAND MANAGEMENT

The following outcomes should be included in the proposed SEPP:

To ensure land contamination is assessed and managed so that the land is suitable for its proposed use and that the contamination does not present an unacceptable risk to human health or any other aspect of the environment.

Matters for Consideration

The proposal involves the rezoning of some areas of land from B6 "Enterprise Corridors" to B4 "Mixed Use". This change will provide an opportunity to integrate suitable business, office, residential, retail and other development in accessible locations so as to maximise public transport patronage and encourage walking and cycling.

However the B4 Mixed Use Zone permits a range of sensitive activities including boarding houses, child care centres, educational establishments, information and education facilities, medical centres and respite day care centres.

The supporting information states that past activities at the site have had a potential to result in site contamination. These include:

- historical and current fuel storage and dispensing infrastructure in several portions of the Cumberland Precinct site
- hazardous building materials formerly or currently located within site structures in portions of the two precincts, including asbestos containing material (ACM) and lead paint
- potentially impacted fill material and waste products which may have been used to create current site levels, including areas of previously identified ACM impacted fill material in the vicinity of Parramatta Stadium
- historical use of portions of the Cumberland precinct for food production, including market gardens, orchards, vineyards, etc
- storage and use of dangerous goods associated with various industrial operations at the site including a public works depot, facilities maintenance, vehicle maintenance, laundry operations and grounds keeping
- applications of pest control chemicals including OCPs and OPPs during site maintenance activities within recreational open spaces, particularly including the sports ovals and areas adjacent to the river
- stockpiles of waste materials identified in various portions of the Cumberland precinct
- fire damaged buildings within the Cumberland Precinct
- potential for migration of contamination onto portions of the site as a result of fuel storage facilities located on adjoining upgradient commercial/industrial sites.

It also states that the potential contamination is unlikely to be of such a scale or occurrence that common remediation and/or management techniques could not render the site suitable for the proposed uses. As such, the potential for contamination to occur at the site is considered not to represent a significant barrier to the future development of the site.

The Planning Report states that any further consideration of SEPP 55 will not be required as the proposal involves no additional sensitive land uses other than those already permitted. In addition the need for further detailed assessment on land contamination issues will be undertaken as part of future development applications under Part 4 of the Environmental Planning and Assessment Act 1979.

The EPA considers that B4 "Mixed Use Zone" allows for a range of sensitive activities where the requirements of SEPP 55 must apply. In particular SEPP 55 states:

- *land that is within an investigation area*
- *land on which development for a purpose referred to in Table 1 to the contaminated land planning guidelines is being, or is known to have been, carried out*

- *to the extent to which it is proposed to carry out development on it for residential, educational, recreational or child care purposes, or for the purposes of a hospital-land:*
 - *in relation to which there is no knowledge (or incomplete knowledge) as to whether development for a purpose referred to in Table 1 to the contaminated land planning guidelines has been carried out*
 - *on which it would have been lawful to carry out such development during any period in respect of which there is no knowledge (or incomplete knowledge).*

In addition the EPA recommends that section 2.4.4 of the Parramatta DCP 2011 should be updated to ensure that it provides guidance on current contemporary contaminated land information and regulatory requirements. In particular, the EPA recommends that the note under section P1 be replaced with the following new provision:

In cases where land is potentially contaminated, the investigation and any remediation and validation work is to be carried out in accordance with the guidelines made or approved by the EPA under Section 105 of the Contaminated Land Management Act 1997 and be in accordance with the requirements of State Environmental Planning Policy 55 – Remediation of Land.

As per SEPP 55, the EPA recommends that a Contemporary Contamination Land Assessment should be undertaken as part of any land use change process to inform future land use. If historical information suggests that activities have been undertaken in the past that has caused site contamination, the EPA recommends that council consider the involvement of an EPA-accredited site auditor during the contamination management process, including the provision of a Site Audit Statement certifying that the land is suitable for the proposed use(s).



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Our File No: SF14/26793
Our Ref: DOC14/278625

Michael File
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23-33 Bridge St
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Sent via email to: Emma Hitchens <Emma.Hitchens@planning.nsw.gov.au>
Anna Johnston <Anna.Johnston@planning.nsw.gov.au>

Dear Mr File

**EXHIBITION OF PARRAMATTA NORTH STATE SIGNIFICANT SITE
PARRAMATTA NORTH URBAN RENEWAL—REZONING PROPOSAL**

Reference is made to your correspondence dated 19 November 2014 that was received by the Heritage Council of NSW (the Heritage Council) on 19 November 2014 regarding the Parramatta North Urban Renewal (PNUR) Rezoning Proposal for the Cumberland Precinct (40 hectares) and the Sport and Leisure Precinct (12 hectares), which forms part of the PNUR area.

At its meeting on the 3 December 2014 the Heritage Council considered a summary report prepared by the Heritage Division regarding the PNUR Rezoning Proposal and resolved that the Heritage Council delegates the review of, and initial submission to the PNUR Rezoning Proposal to the Director, Heritage Division.

The PNUR area encompasses the following State Heritage Register (SHR) items: Parramatta Correctional Centre—SHR N^o 00812; Cumberland District Hospital Group—SHR N^o 00820; Norma Parker Correctional Centre—SHR N^o 00811; Former Kings School Group—SHR N^o 00771; and part of Parramatta Park—SHR N^o 00596.

The PNUR proposal has the potential to deliver to the community a sustainable and long term funding program for heritage restoration and management of the SHR places, and deliver housing, cultural uses and employment on the edge of the Parramatta CBD.

The Heritage Council supports the vision for PNUR having regard to the significant cultural landscape, which provides a unique opportunity to pursue a comprehensive world class urban renewal that builds upon the multi layered heritage significance of the area.

Generally the Heritage Council is supportive of an Indicative Layout Plan that will guide future open spaces, transport links and building footprints and heights; and congratulates NSW UrbanGrowth for coordinating the detailed studies for the PNUR proposal. However, detailed consideration will need to be given to the final built forms, materiality and fine grain detail of the public urban spaces to ensure a world class heritage-led urban renewal outcome for the SHR places.



Heritage Council



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The Heritage Council's initial delegated submission to the PNUR Rezoning Proposal is detailed on **Attachment A**, and a final submission will be submitted to the Department of Planning after the Heritage Council considers the matter at its meeting on Wednesday 4 February 2015.

The Heritage Council supports an ongoing and collaborative involvement with NSW UrbanGrowth and other key stakeholders, to ensure this State Significant heritage-led urban renewal project for PNUR is delivered in a timely manner for the people of New South Wales.

If you have any questions regarding the above matter please contact Michael Ellis, Heritage Officer at the Heritage Division, Office of Environment & Heritage, on (02) 9873 8572.

Yours sincerely

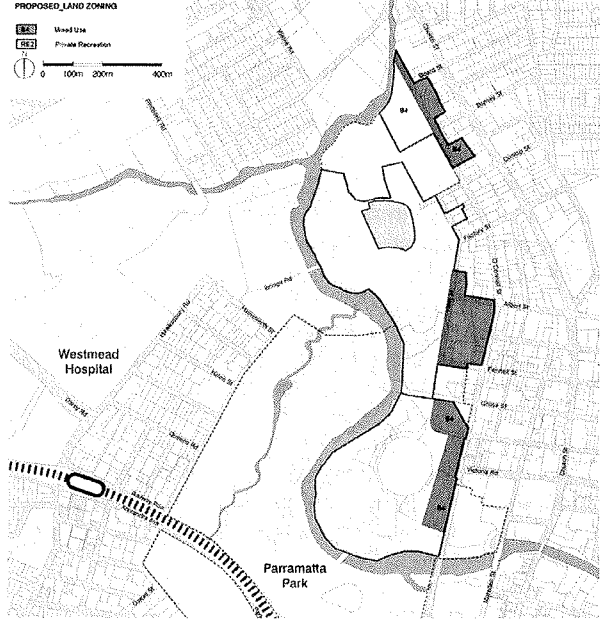
DR TRACEY AVERY

Director
Heritage Division
Office of Environment & Heritage

As Delegate of the Heritage Council of NSW

**EXHIBITION OF PARRAMATTA NORTH STATE SIGNIFICANT SITE
PARRAMATTA NORTH URBAN RENEWAL—REZONING PROPOSAL**

ATTACHMENT A

| Parramatta North Urban Renewal—Draft State Environmental Planning Policy (PNUR) 2014 Planning Report dated 12 November | |
|---|---|
| <u>EXHIBITED MATERIAL</u> | <u>HERITAGE COUNCIL'S COMMENTS</u> |
| <p>PART B: PROPOSED AMENDMENT TO THE PLANNING FRAMEWORK.</p> <p>4.1 CURRENT LAND USE ZONES Parramatta LEP 2011 covers the entire Cumberland Precinct and applies the following zones:</p> <ul style="list-style-type: none"> • B4 Mixed Use • B6 Enterprise Corridor • R2 Low Density Residential • R4 High Density Residential | <p>This section should identify that the Parramatta River's edge is currently zoned W1 Natural Waterways.</p> <p>It is recommended to be replaced with:</p> <p>4.1 CURRENT LAND USE ZONES Parramatta LEP 2011 covers the entire Cumberland Precinct and applies the following zones:</p> <ul style="list-style-type: none"> • B4 Mixed Use • B6 Enterprise Corridor • R2 Low Density Residential • R4 High Density Residential • W1 Natural Waterways |
| <p>4.2 PROPOSED LAND USE ZONES AND DEVELOPMENT STANDARDS</p>  <p>Figure 8: Proposed zone map</p> | <p>It is recommended that Open Spaces' 1, and Open Space 2 and the remainder of the 'public open spaces' identified in the Indicative Layout Plan, which is adjacent to the land use zone <i>W1 Natural Waterways</i> along Parramatta River's edge is zoned <i>RE1 Public Recreation</i>.</p> <p>The Heritage Council considers this an important matter to be addressed and updated throughout all planning documents to ensure the future protection and public access to this section of Parramatta River.</p> |

4.1 HEIGHT OF BUILDINGS

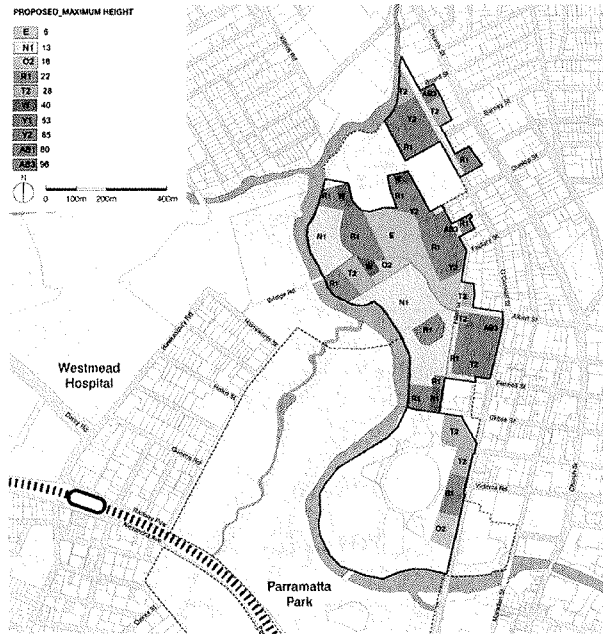


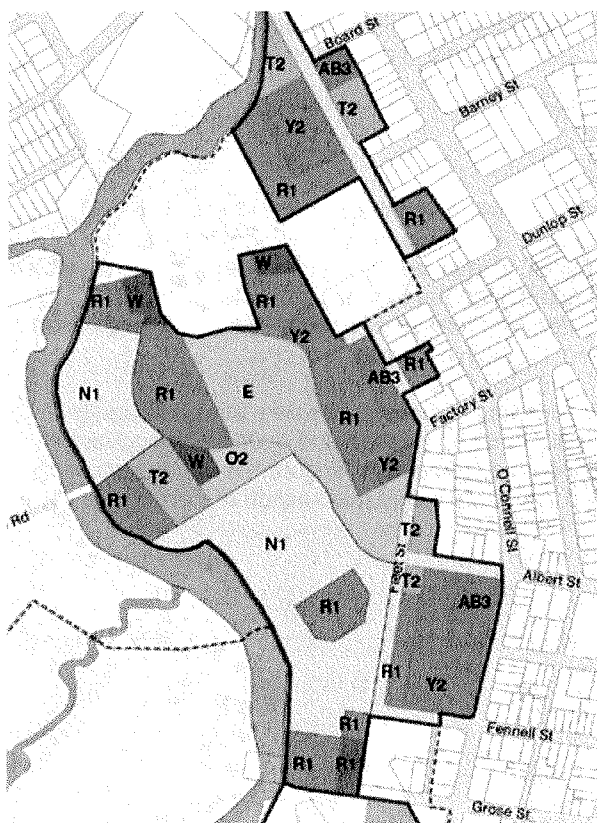
Figure 10: Proposed Height of Building map

It is recommended that Open Spaces' 1, and Open Space 2 and the remainder of the 'public open spaces' identified in the Indicative Layout Plan (ILP) are designated 'E'.

The Road Reserves identified in the ILP, should not be designated any height in the Proposed Height of Buildings map.

The Heritage Council considers these important matters to be addressed and updated throughout all documents.

4.1 HEIGHT OF BUILDINGS



Part view of Figure 10: Proposed height of building map.

Development lot E3

Development lot E3 is proposed to be designated R1, W and Y2; however, Y2 should be amended to Y1 to be consistent with the ILP, which indicates a building envelope in this area of 16 and 6 storeys.

Note that a height designation of Y2 would allow for a 20 storey building, which is not supported by the Heritage Council in this particular area.

Development lot G1

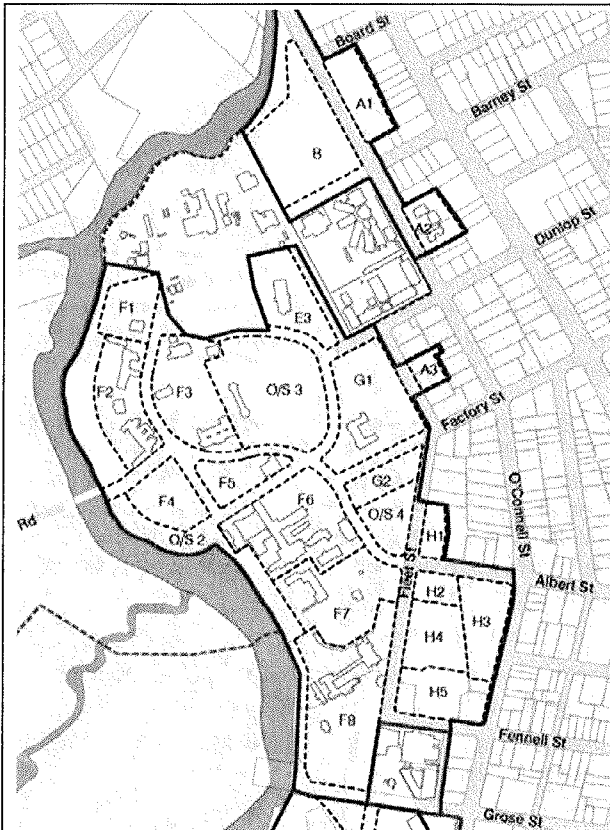
Development lot G1 is proposed to be designated R1, Y2 and AB3; however, AB3 should be amended to AB1 and reduced in area to be consistent with the ILP, which indicates a 24 storey building envelope in a reduced area.

Note that a height designation of AB3 would allow for a 30 storey building, which is not supported by the Heritage Council in this particular area.

Development lot G2

Development lot G2 is proposed to be designated R1, Y2; however, Y2 should be amended to Y1 to be consistent with the ILP, which indicates a 14 storey building envelope in this area.

Note that a height designation of Y2 would allow for a 20 storey building, which is not supported by the Heritage Council in this particular area.



Part view of Figure 12: Proposed additional Gross Floor Area (GFA) Map, showing the development lots.

Development lot F5

Development lot F5 is proposed to be designated O2 and W; however, it is considered that a 12 storey building envelope in this area, as indicated of in the ILP would harm the heritage values of the core heritage precinct. Therefore, the Heritage Council recommends that the W designation be amended to T2, which would allow for an 8 storey building.

Development lot F8

Development lot F8 is proposed to be designated N1, R1 and W (note W is incorrectly labelled R1)

It is recommended that the larger R1 designated area is amended to be 50% O2 and 50% R1, which would then be consistent with the ILP that indicates a 4 storey and 6 storey building envelope.

4.4 FLOOR SPACE RATIO

It is proposed that the Study Area be removed from the FSR map and statutory control applied through a maximum new GFA control.

The proposed GFA map (Figure 12) would be included in the Key Sites map of the Parramatta LEP 2011. This approach reflects the detailed urban design assessment that has been pursued to formulate the ILP.

Insufficient information has been provided to enable the Heritage Council to make a full and proper assessment, as to whether or not, the proposed GFA control is consistent with the GFA potential in the ILP envelopes for proposed developments.

The Heritage Council recommends that the proposed GFA control is amended to be consistent with the reduced yield proposed in development Lot F5, and that a detailed report is provided that demonstrates that the GFA controls are consistent with the GFA potential in the ILP envelopes for proposed developments.

11.5 PARRAMATTA POOL

...The pool site, currently zoned RE1 Public Recreation, is proposed to be rezoned to B4 Mixed Use. The pool and hard paved areas east of the stadium comprise an area of 29,040m² that is currently zoned RE2 Private Recreation. The central open space area within the Cumberland Precinct is proposed to be rezoned from the current B4 Mixed Use. This open space park proposed to be rezoned to RE2 Private Recreation has an area of 22,277m². Use

The character of the Cumberland Precinct is dominated by an institutional parkland landscape type with an open campus arrangement of buildings with varying historic significance.

The Heritage Council supports that the central open space area with the Cumberland Precinct is proposed to be zoned RE2 Private Recreation, which will help mitigate adverse heritage impacts of development proposed in the vicinity.

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| <p>zone to RE2 Private Recreation which permits the pool as a land use and provides an offset against the loss of recreation zoned land. The application of the RE1 Public Recreation zone is not proposed at this stage as no government authority has agreed to it coming into public ownership. This could be a matter resolved during the assessment phase of the Study [sic].</p> | <p>Nonetheless, any reference to 'an offset against the loss of recreation zoned land' in relation to the amendment to the RE1 zone where the existing Parramatta Pool is currently located should be removed from the planning documents.</p> <p>The Heritage Council would not support a swimming pool located in the Cumberland Precinct or Open Space 3 (O/S 3), and recommends that consideration be given to integrating the pool and its facilities within the proposed building/s within development Lot SC and SD.</p> <p>Furthermore, to mitigate adverse heritage impacts of any development on Lot SC and SD the Heritage Council recommends that Open Space 5 (O/S 5) is identified on the ILP and details provided in the report entitled 'Parramatta North Urban Renewal—Landscape Re-zoning Report' prepared by Context Landscape Design.</p> |
| <p>Attachment 17: Schedule of actions for UrbanGrowth NSW as Government Co-ordinator</p> | <p>Items 3 Undertaking</p> <p>Replace words: 'Preparation of an Archaeological Research Design' with:</p> <p>'Preparation of an Archaeological Methodology and Research Design.'</p> |

| Draft Amendment to Parramatta Development Control Plan 2011 | |
|--|--|
| <u>EXHIBITED MATERIAL</u> | <u>HERITAGE COUNCIL'S COMMENTS</u> |
| <p>4.3.5 PARRAMATTA NORTH URBAN RENEWAL</p> | |
| <p>4.3.5.4 Indicative Layout Plan (ILP)</p> <p>Each development lot is subject to specific development lot plan requirements at Section 4.3.5.10 and 4.3.5.11 which guide future development of the lots and provides controls...</p> | <p>Contains a misdescription (bold). Replace with:</p> <p>Each development lot is subject to specific development lot plan requirements at Section 4.3.5.12 and 4.3.5.13 which guide future development of the lots and provides controls...</p> |
| <p>4.3.5.3 Design Excellence</p> <p>Provisions 1. Development including buildings of 10 or more storeys must be considered by DEAP.</p> | <p>Change to 5 or more storeys or development involving significant heritage buildings must be considered by DEAP. See p.34 of Draft State Environmental Planning Policy (PNUR) 2014 Planning report for reference to 5 storeys. Given proposals for buildings of 6 and 8 storeys close to significant heritage buildings use of the DEAP is highly recommended.</p> |
| <p>4.3.5.7 Open Space Provision Controls</p> <p>C.1 Development applications for subdivision are to be generally in accordance with the Open Space Plan at Figure 4.3.5.5.5 Open Space Provision.</p> | <p>Contains a misdescription (bold). Replace reference with:</p> <p>Figure 4.3.5.11 Open Space Provision.</p> |


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| <p>4.3.5.10 Built Heritage</p> <p>The <i>PNUR Built Heritage Management Strategy</i> (BHMS) has been prepared to guide development so that it avoids, minimises or mitigates impacts on significant buildings and structures and their setting. The BHMS provides general management recommendations as well as more specific requirements for each of the development parcels.</p> | <p>The Heritage Council will review and provide additional comments following receipt of the <i>PNUR Built Heritage Management Strategy</i>.</p> |
| <p>4.3.5.11 Historical (European) Archaeology</p> <p>The Indicative Layout Plan (ILP) includes new development within areas that have potential to retain significant archaeology. While it is preferred that archaeology of State and potentially National heritage significance is retained <i>in situ</i>, it is accepted that some limited areas may be affected to provide for the retention and conservation of the broader heritage values of the two precincts and facilitate their sustainable adaptive re-use.</p> | <p>All archaeology of potential National/State significance should be retained <i>in situ</i>, be interpreted and opportunities for further research be investigated. However, consideration of its removal will be merit based, taking into consideration its significance, intactness and the like.</p> <p>The Heritage Council recommends that this paragraph is amended to remove reference to 'it is accepted', as follows:</p> <p>The Indicative Layout Plan (ILP) includes new development within areas that have potential to retain significant archaeology. While it is preferred that archaeology of State and potentially National heritage significance is retained <i>in situ</i>, any removal will be merit based assessed, taking into consideration its significance and intactness.</p> <p>Some limited areas may be affected to provide for the retention and conservation of the broader heritage values of the two precincts and facilitate their sustainable adaptive re-use.</p> |
| <p>4.3.5.11 Historical (European) Archaeology</p> <p>The <i>PNUR Archaeological Management Strategy</i> (AMS) has been prepared to guide development so that it avoids, minimises or mitigates impacts on significant archaeology. The AMS provides general archaeology management recommendations as well as more specific requirements for each of the development parcels within the two precincts.</p> | <p>The Heritage Council will review and provide additional comments following receipt of the <i>PNUR Archaeological Management Strategy</i>.</p> |
| <p>4.3.5.11 Historical (European) Archaeology</p> <p>The relics provisions of the <i>Heritage Act 1977</i> apply across New South Wales. A Heritage Act approval will generally be required to undertake excavation within most areas of the Cumberland Precinct or Sports and Leisure Precinct, although some exemptions do apply. This approval requirement is in addition to any requirements of the <i>Environmental Planning and Assessment Act 1979</i>.</p> | <p>The Heritage Council recommends that this paragraph is amended to remove reference to 'although some exemptions do apply', as follows:</p> <p>The relics provisions of the <i>Heritage Act 1977</i> apply across New South Wales. A Heritage Act approval will generally be required to undertake excavation within most areas of the Cumberland Precinct or Sports and Leisure Precinct. This approval requirement is in addition to any requirements of the <i>Environmental Planning and Assessment Act 1979</i>.</p> |
| <p>4.3.5.13 Development lot controls</p> <p>Lot SD</p> | <p>The southern portion of development lot SD is indicated as <i>public open space</i> in the ILP and should also be designated as open space in the development controls.</p> <p>The Heritage Council recommends that the southern portion of the development lot is designated 'PUBLIC</p> |



Heritage Council



of New South Wales

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| <p>LOT 50 Additional LFA: 6,938 m²</p>  <p>LOT IDENTIFICATION PLAN</p> <p>The diagram shows a map of New South Wales on the left with a small square indicating the location of Lot 50. On the right is a detailed site plan of Lot 50, which is a rectangular lot with a driveway on the right side. The lot is divided into several sections, with two sections labeled 'A' and 'B'.</p> | <p>OPEN SPACE WITHIN LOT'</p> |
|--|-------------------------------|



Contact: Michael Ellis
Phone: (02) 9873 8572
Email: Michael.Ellis@environment.nsw.gov.au
Our File No: SF15/15032
Our Ref: DOC15/106450

Michael File
Director, Urban Renewal
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Sent via email to: Emma Hitchens <Emma.Hitchens@planning.nsw.gov.au>
Anna Johnston <Anna.Johnston@planning.nsw.gov.au>

Dear Mr File

PARRAMATTA NORTH URBAN RENEWAL—REZONING PROPOSAL

Further to our correspondence dated 6 February 2015 the Heritage Council of NSW (the Heritage Council) considered at its meeting on 4 March 2015 a presentation by UrbanGrowth NSW and their design team on the Parramatta North Urban Renewal (PNUR) rezoning proposal.

A key component of the presentation responded to the Heritage Council's correspondence dated 6 February 2015 and resolution no. 2 that required *'that prior to the approval of the PNUR rezoning application a 3-D model of the PNUR area...be prepared and submitted to the Heritage Council for further consideration.'*

The Heritage Council considered a presentation by UrbanGrowth including the draft 3-D modelling prepared with SketchUp software and revised Indicative Layout Plan (ILP) dated 16 February 2015 (Rev. 13k) and resolved that *a subcommittee of the Heritage Council is established, consisting of Heritage Council member's Jenny Davis, Deborah Dearing and Stephen Davies to consider further matters relating to the Parramatta North Urban Renewal rezoning proposal.*

The subcommittee met with UrbanGrowth on Thursday 12 March to consider further revisions to the ILP, which were undertaken in response to comments raised by the Heritage Council in its March 2015 meeting and submissions made by the community.

On Monday 16 March UrbanGrowth submitted to the subcommittee revised Schedule of Undertakings dated 13 March 2015.

On Thursday 26 March UrbanGrowth submitted to subcommittee a flowchart outlining task to be undertaken by UrbanGrowth and revised ILP dated 26 March 2015 (Rev. 14a) that on balance, addresses the comments raised by the Heritage Council and subcommittee, namely:

- Removal of 16 storey building in E3 to provide views towards the gaol.
- Reduction in height of building envelopes in F2 from 3 storeys to 2 storeys, which contains foreshore heritage buildings.
- Reduction in height of building envelope in F5 from 12 storeys to 6 storeys to take account of Heritage Council comments.
- Revision of the building envelope in F3 to take account of subcommittee comments.



Furthermore, UrbanGrowth has advised the Heritage Council that the Sports Precinct component of the PNUR rezoning proposal containing allotments SA, SB, SC and SD will be deferred and a request to this effect will be included in UrbanGrowth's Response to Submissions to the Department of Planning and Environment.

The Heritage Council recommends that any future proposal for the Sports Precinct should include a detailed heritage-led master plan for the precinct, which takes into consideration significant views to and from Old Government House and Parramatta Park, otherwise known as Old Government House and Domain.

The PNUR rezoning proposal for the Cumberland Precinct has the potential to deliver to the community a sustainable and long term funding program for heritage restoration and management of the state significant heritage places in the Cumberland Precinct for future generations.

On 1 April 2015 the subcommittee recommend to the Heritage Council its support of the revised Schedule of Undertakings dated 13 March 2015 and ILP dated 26 March 2015 (Rev. 14a), subject to Schedule of Undertakings item no. 2 being amended to 'Prepare a Conservation Management Plan for the site and Specific Precinct Conservation Plan for each allotment'.

In addition, the proposed delisting of allotments A1 and A2 from the State Heritage Register as indicated in flowchart outlining task to be undertaken by UrbanGrowth would require a full and proper assessment by the Heritage Council.

The Heritage Council delegates the consistency review of UrbanGrowth's Response to Submissions and other matters that may arise in relation to the PNUR rezoning proposal to the Director, Heritage Division.

The Heritage Council supports an ongoing and collaborative involvement with UrbanGrowth to ensure this state significant heritage-led urban transformation proposal for PNUR is delivered in a timely manner for the people of New South Wales.

If you have any questions regarding the above matter please contact Michael Ellis, Acting Senior Assessment Officer at the Heritage Division, Office of Environment & Heritage on (02) 9873 8572.

Yours sincerely

Professor Lawrence Nield
Chair of the Heritage Council of New South Wales

1 April 15



Mr Michael File
Director, Urban Renewal
Department of Planning & Environment
GPO Box 39
Sydney NSW 2001

Attention: Ms Emma Hitchens

Exhibition to Parramatta North State Significant Site

Thank you for your letter dated 19 November 2014, regarding the above. Please accept our letter as a joint Transport for NSW (TfNSW) and Roads and Maritime Services response with respect to the above.

TfNSW recognises and supports the policy direction outlined within the Metropolitan Strategy "A Plan for Growing Sydney" to accommodate an additional 664,000 new dwellings by 2031 through *Direction 2.1: Accelerate Housing Supply across Sydney*, and subsequent actions including:

- Action 2.1.1: Accelerate housing supply and local housing choices;
- Action 2.1.2: Accelerate new housing in designated infill areas (established urban areas) through the Priority Precincts and UrbanGrowth NSW (UGNSW) programs;
- Action 2.1.3: Deliver more housing by developing surplus or under-used Government land.

TfNSW also recognises that *Direction 1.2: Grow Greater Parramatta* identifies Parramatta as Sydney's second CBD and recognises the CBD's role in supporting the growth of Western Sydney through actions including:

- Action 1.2.1: Grow Parramatta as Sydney's second CBD by connecting and integrating Parramatta CBD, Westmead, Parramatta North, Rydalmere and Camellia;
- Action 1.2.2: Grow the specialised health and education precincts at Westmead and Rydalmere;
- Action 1.2.3: Renew Parramatta North to create a vibrant mixed use precinct.

TfNSW is therefore supportive of the subject development, which links and enhances the urban connection from the CBD to Westmead and recognises the development's role in assisting to achieve these NSW Government policy objectives.

As Parramatta's role as Sydney's second CBD continues to grow, TfNSW also recognises that the nature of the travel demand to and from the CBD will change, including how users will get to and from it.

Through ongoing planning as well as new projects outlined within our strategic planning documents, TfNSW will improve and enhance the transport network in and around Parramatta to reflect its CBD role.

TfNSW notes the rezoning proposal envisages mixed use development located adjacent to key transport corridors into the CBD (existing, planned and proposed in this case) and this principle is also supported by TfNSW.

TfNSW also recognises and is supportive of the approach to travel demand management outlined within the *Traffic and Transport Review* accompanying the rezoning. Of particular note is the consideration given to establishment of new active transport connections to and from the CBD, improvements to support a mix of travel choices commensurate with the needs of the community.

Notwithstanding this, the total attributable impact from the development on the road network will be significant given the scale of the development and residual travel demand that is subsequently reliant on private vehicles despite a focus on public transport and demand management.

TfNSW notes that the traffic assessment accompanying the rezoning proposal recognises that an impact on the transport network will occur from the development and identifies a range of possible mitigation measures proposed in the proximity of the development.

Notwithstanding this, preliminary estimates suggest the total cost of regional road upgrades that could be attributable to the development is in the order of \$70 million to \$200 million (depending on scale and complexity of works). This amount is inclusive of the cost of upgrades proposed by UGNSW, which is in the order of \$45 million.

TfNSW proposes to continue to work with Department of Planning and Environment, UGNSW and Parramatta City Council to refine the measures proposed by UGNSW to ensure that a suite of mitigation measures ultimately proposed would be consistent with the outcomes of studies currently being undertaken for a potential light rail and overall accessibility to and within the Parramatta CBD.

The Transport Management and Accessibility Plan (TMAP) process outlined at **TAB A** will clarify and refine the actual extent of impacts on the transport network and define the mitigation measures required that are reflective of, and align with the broader transport objectives for Parramatta and its role as Sydney's second CBD. The TMAP would provide the following information to UGNSW and TfNSW:

- the feasibility of establishing the infrastructure works that would be fully explored through the assessment.
- the strategic fit of these works in the context of broader potential transit oriented improvements to the network.
- the development's impact on the elements of the regional road network in close proximity to the development area.
- Prior to the lodgement of any development application for the project:
 - UGNSW prepares a TMAP that identifies the extent, scale, feasibility and timing of the mitigation measures proposed as part of the application.
 - UGNSW, Parramatta City Council and TfNSW agree on the full extent of infrastructure works identified in the TMAP to mitigate the development impact on the local and regional transport network.
 - GNSW develop a funding strategy that is lodged with the Department of Planning and Environment as a part of a Planning Agreement, and is agreed with TfNSW, that outlines the cost and responsibility for delivery of all transport and infrastructure works related to the development.

- UGNSW develop a funding strategy that is endorsed by Cabinet and following the approval of the proposed rezoning, outlining the cost and responsibility for delivery of all transport and infrastructure works related to the development.
- The proposal recognises the potential to impact on the following additional components of the regional transport network including, but not limited to:
 - Windsor Road/Cumberland Highway, and Pennant Hills Road/James Ruse Drive;
 - Victoria Road, including the interchange with James Ruse Drive;
 - Great Western Highway, including the intersections with Pitt Street and O'Connell Street;
 - Bus circulation and access routes into the CBD, including Argyle Street and Church Street.

Once the TMAP process is finalised and all parties agree on the infrastructure measures needed to support the future development, and consistent with the advice above, TfNSW requests that the funding strategy developed by Urban Growth, agreed with TfNSW and endorsed by Cabinet to clearly outline the quantum and responsibility for meeting the costs of all infrastructure and services required to support this development. This Planning Agreement should be in place prior to the first Development Application being lodged.

If you require any clarification of any issue raised, please don't hesitate to contact Mark Ozinga on 8202 2198.

Yours sincerely



Anissa Lewy

**Deputy Director General
Planning & Programs**

CD14/21508

TAB A

Transport Management and Accessibility Plan

TfNSW requests that the applicant prepare a Transport Management and Accessibility Plan (TMAP) in accordance with the Draft Interim Guidelines on Transport Management and Accessibility Plans.

This TMAP should enhance and validate the *Traffic and Transport Review* done to date to confirm the extent, scale, feasibility and timing of the mitigation measures proposed, as well as confirm the extent of further impacts from the development on regional transport infrastructure, including, but not limited to, the following:

- Windsor Road/Cumberland Highway interchange;
- Pennant Hills Road/James Ruse Drive interchange;
- Victoria Road, including the interchange with James Ruse Drive;
- Great Western Highway, including the intersections with Pitt Street and O'Connell Street;
- Bus circulation and access routes into the CBD, including Argyle Street and Church Street.

TfNSW has developed an appropriate mesoscopic modelling tool that considers the proposed development in the context of development in Greater Parramatta into the future and accordingly, additional or alternative mitigation measures that complement the works proposed as part of the application need to be examined.

TfNSW requests that the TMAP utilise this tool to further consider the extent that the proposed mitigation measures integrate and complement potential improvements to the network in Parramatta as well as identify a proportional impact to these that can be attributed to the development.

TfNSW will work with the applicant to confirm the extent of mitigation measures to be further tested in the model.

The TMAP should also include rationalization of the bus servicing strategy to the Parramatta North Urban Renewal development, including further discussions with TfNSW regarding the feasibility of proposed extensions to the shuttle service as well as a potential connection through the development to Westmead on Bridge Road.

TfNSW welcomes the proposal to establish an active transport link from the site to Parramatta along the waterway and sees this as an essential component of the TMAP and achieving the travel demand management outcomes sought through the development.

Accordingly, TfNSW requests that the TMAP provide further consideration of bicycle facilities are part of the development. TfNSW suggests that a provision based on Council's DCP provision (3,095 spaces across the development) is insufficient to meet the travel demand outcomes sought for the precinct. Therefore, TfNSW looks forward to an outcome that reflects a higher provision of spaces than 1 bicycle space per 2 dwellings.

TfNSW supports the proposal within the *Traffic and Transport Review* that an innovative approach to car parking be applied. TfNSW therefore requests that the TMAP define car parking rates to be applicable to the development that reflect a constrained approach to car parking supply cognisant of the precincts location and role as supportive of the Parramatta CBD.

Dear Emma

Thank you for the opportunity to comment on the Parramatta North Urban Renewal New Planning Framework Summary report dated November 2014.

Venues NSW would like to make the following comments and suggestions for consideration:

- An increase to the height limits for the proposed buildings along O'Connell Street in the Sport and Recreation Precinct due to the relative heights of the adjacent buildings. The buildings labelled SB are currently proposed to have height limits of 8 and 6 storeys respectively while buildings to the north have significantly higher limits.
- While acknowledging the intent for priority to be given to pedestrians, cyclists, public transport and service vehicles; vehicle access and onsite parking at Pirtek Stadium (Parramatta Stadium) is an issue. The impact for Stadium parking capacity is unclear and we would like further clarification particularly on the maximum parking ratios and requirement for basement parking only in curtilage zones.
- The site located to the north of the Stadium may have additional development potential.

Please let me know if you require any further detail or clarification on the above.

Regards

Sally



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Ms Emma Hitchens
Team Leader
Urban Renewal
Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

Dear Ms Hitchens

I understand the NSW Department of Planning and Environment (DPE) is undertaking public consultation in relation to the proposed rezoning of the Parramatta North Urban Renewal (PNUR) area. As you may be aware, over the last few years the Australian Government Department of the Environment (DoE) has been working with DPE and Parramatta City Council in relation to the protection of one of Parramatta's significant heritage places: the World and National Heritage listed Old Government House and Domain.

All three levels of government are currently developing a Conservation Agreement under the *Environment Protection and Biodiversity Conservation Act 1999* for the protection and conservation of the World and National Heritage values of Old Government House and Domain. The draft Conservation Agreement reflects the controls in the *Parramatta Development Control Plan 2011* (DCP) which was amended by Parramatta City Council earlier this year to create the 'Park Edge Special Area'.

DoE has looked at the *Draft Amendment to Parramatta Development Control Plan 2011* that was recently on exhibition as it proposes changes to these controls, in particular to Area A.1 – Parramatta Leagues Club Site, and Area A.2 – Parramatta Stadium Site, Parramatta Pool and Car Park. These areas are located within the 'Sport and Leisure Precinct' identified in the PNUR for rezoning and approximately 34,000m gross floor area of mixed-use (predominantly commercial) development.

The proposed rezoning will introduce new buildings with a potential for visual impact in an area that is currently relatively undeveloped due to its zoning for recreation. In addition, the development controls for Lots SA, SB, SC and SD in the PNUR 'Sport and Leisure Precinct' provide for development of four to eight storeys (or up to 28 metres according to the *Draft State Environmental Planning Policy PNUR 2014 Planning Report*).

It is unclear how these figures relate to the current DCP/ draft Conservation Agreement controls which refer to the need for 80% of the building height to be contained below the level of the established tree canopy of Parramatta Park when viewed from six specified viewing locations. DoE understands a *Cultural Landscape Heritage Assessment* has been prepared that found the visual impacts of the development would be minor and acceptable.

This Assessment does not however compare the proposed controls for the 'Sport and Leisure Precinct' with the controls recently developed for Areas A.1 and A.2 in the current DCP. We would therefore appreciate being provided with more detail on how the revised height controls for Lots SA, SB, SC and SD have been developed and their relationship with the previous controls.

Please contact Ms Leanne Burrows, Assistant Director, National Historic Heritage Section, on (02) 6275 9123 if you would like to discuss further.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Jennifer Carter', with a large, stylized flourish at the end.

Jennifer Carter
Director
Historic Heritage Section

5 January 2015

Appendix G Recommended changes

The recommended changes to the proposal prepared by UrbanGrowth NSW in response to submissions are summarised as follows:

| | Recommended Change | Comment |
|---|---|---|
| Rezoning Area | | |
| 1 | Defer Sports and Leisure precinct. | The existing zones, building heights and other development controls that apply to the land under Parramatta LEP 2011 would continue to apply. |
| 2 | Defer NSW Linen Service land. | |
| Building Heights and FSR | | |
| 3 | Reduce the height of the northern most proposed building from 96m (30 storeys) to 66m (20 storeys), whilst maintaining the overall exhibited floor space potential in this area of the site (development block A1). | This will allow for a building which transitions appropriately from Council's height controls for the CBD north, while allowing for a landmark feature building at the entry to the site. |
| 4 | Reduce the height and FSR of proposed buildings in the block bounded by Fleet, Albert, O'Connell and Fennell Streets from a maximum of 96m (30 storeys) to a maximum of 66m (20 storeys), with development fronting O'Connell Street opposite the North Parramatta Conservation area reduced from a maximum of 96m to a maximum of 21m (6 storeys). | This will ensure a more appropriate transition to the adjoining North Parramatta Conservation Area. |
| Land Use Zones | | |
| 5 | Increase the area proposed to be zoned RE1 Public Recreation at the south of the Cumberland precinct to include the Grey-headed Flying Fox colony and provide a 30m minimum width for the RE1 zone along the Parramatta River foreshore. | This will provide for the protection of the Grey-headed Flying Fox colony and continuation of the RE1 zone along the Parramatta River foreshore consistent with Council's existing LEP. |
| Natural Resources Biodiversity Map | | |
| 6 | Include the Grey-headed Flying Fox colony on the existing Natural Resources – Biodiversity map to apply clause 6.4 Biodiversity Protection of the Parramatta LEP 2011 to this area. | This will provide for the protection of the Grey-headed Flying Fox colony. |
| Design Excellence | | |
| 7 | Include a design excellence clause within Parramatta LEP 2011 that is generally consistent with the provisions that currently apply to the Parramatta City Centre. | This will ensure that development exhibits design excellence that contributes to the natural, cultural, visual and built character values of the area. |

Appendix H Community Newsletter

Parramatta North Urban Transformation

The minister has approved an amendment to the Local Environment Plan 2011, which rezones land within the Parramatta North precinct.

Community feedback has resulted in significant changes to the rezoning for the Parramatta North Urban Transformation project, most importantly to protect the significant heritage values of the land, as well as the amenity of the surrounding residential area.

The new precinct, which will have capacity for around 3,000 homes, is close to Parramatta CBD, transport, parklands and local services.

The rezoned land comprises 20,000m² of floor space for adaptive reuse of heritage items and 4,000m² of floor space for local retail purposes. Building heights have been reduced from those exhibited and in some cases buildings deleted to respect heritage items, ensure appropriate transitions to existing residential areas and minimise overshadowing.

For the key heritage precincts associated with the Female Factory and Norma Parker Centre, there has been no increase in the development potential and a reduction in the maximum height of buildings which applied prior to rezoning.

Community Consultation

Public exhibition of the proposal took place in late 2014 with:

- ▶ 1,725 property owners notified by mail
- ▶ 3,750 residences and businesses letterbox dropped in the surrounding area
- ▶ 2 UrbanGrowth NSW community 'drop in' sessions held.

The Heritage Council of NSW was also consulted for specialist heritage advice.

The Department received 166 submissions about the proposed rezoning. The key issues raised were:

- ▶ heritage
- ▶ building height and density
- ▶ parking
- ▶ consultation
- ▶ community facilities, services and amenities.



Further Information

For further information contact the Information Centre on **1300 305 695**.



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Responding to your issues

Importantly, a number of key changes have been made to the proposed plans in response to feedback from the community. These include:

- ▶ reduction in the heights of proposed buildings close to heritage items in the Cumberland sub precinct, including the removal of a proposed 16 storey building next to the Parramatta Gaol
- ▶ reduction in the height of a proposed building at the northern most part of the site fronting O'Connell Street from 30 storeys to 20 storeys
- ▶ reduction in the height of buildings in the block bounded by Fleet, Albert, O'Connell and Fennell Streets from a maximum of 30 storeys to a maximum of 20 storeys overall and 6 storeys opposite the North Parramatta Conservation Area
- ▶ increase in the area of the land to be zoned RE1 Public Recreation to over 5ha, including protection of the Grey-headed Flying Fox colony
- ▶ introduction of a design excellence clause into the Parramatta LEP so that future buildings positively contribute to the architectural quality of Parramatta and are appropriate for the local area

- ▶ requiring more planning and consultation for the Sports and Leisure sub-precinct to resolve issues such as potential land use conflict and noise prior to any rezoning approval for the area
- ▶ requiring more planning and consultation for the NSW Linen Service land to resolve issues such as potential heritage and residential amenity impacts, prior to any rezoning approval for the area.

What happens next?

UrbanGrowth NSW have committed to undertake further community consultation and prepare more detailed studies to support the lodgement of development applications with Parramatta Council.

Parramatta Council will also finalise an amendment to its Development Control Plan to confirm detailed planning and design guidelines for the building height and floor space controls allowed under the rezoning. Amendments to Council's Development Control Plan will be finalised prior to any future development application for the land being decided.

More Information

- 📄 Online www.planning.nsw.gov.au/parranorth
- @ urbanactivation@planning.nsw.gov.au
- ☎ 1300 305 695



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