

Appendix E Parramatta City Council submission

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Your Reference: Parramatta North  
Our Reference: F2014/00735  
Contact: Jennifer Concato  
Telephone: 9806 5767

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

9 January 2015

Dear Mr File

**Public Exhibition of UrbanGrowth NSW proposal for the Parramatta North Urban Renewal precinct – Submission**

I refer to your letter dated 19 November 2014 advising of the public exhibition of the UrbanGrowth NSW proposal for the Parramatta North Urban Renewal precinct.

Council considered a report on the proposal at its meeting of 15 December 2014, where it resolved to make a submission on the proposal. Accordingly, please find attached a copy of Council's detailed submission on the proposal for your consideration.

Council is keen to work cooperatively with representatives from UrbanGrowth NSW and the Department of Planning and Environment to resolve the matters identified in our submission and work towards the goal of achieving a high quality, connected, vibrant and activated precinct.

If you have any questions in response to Council's submission, please contact Jennifer Concato, Manager City Strategy on 9806 5767.

Yours sincerely

A handwritten signature in purple ink, appearing to read 'Greg Dyer', written over a horizontal red line.

Greg Dyer  
Chief Executive Officer



# Parramatta North Urban Renewal Precinct



## Submission

Parramatta City Council

December 2014

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# Part 1 – The Proposal

## 1.1 Introduction

The 'Parramatta North Urban Renewal' precinct consists of 146 ha of NSW Government owned land and includes four distinct precincts: Parramatta Park Precinct, the Cumberland Precinct (Cumberland Hospital (East) campus), the Old Kings School Precinct and the Sport and Leisure Precinct (including Parramatta Stadium), as illustrated in the Precinct Map below. The NSW Government, through UrbanGrowth NSW, is proposing a new planning framework for portions of the Cumberland Precinct and the Sport and Leisure Precinct.

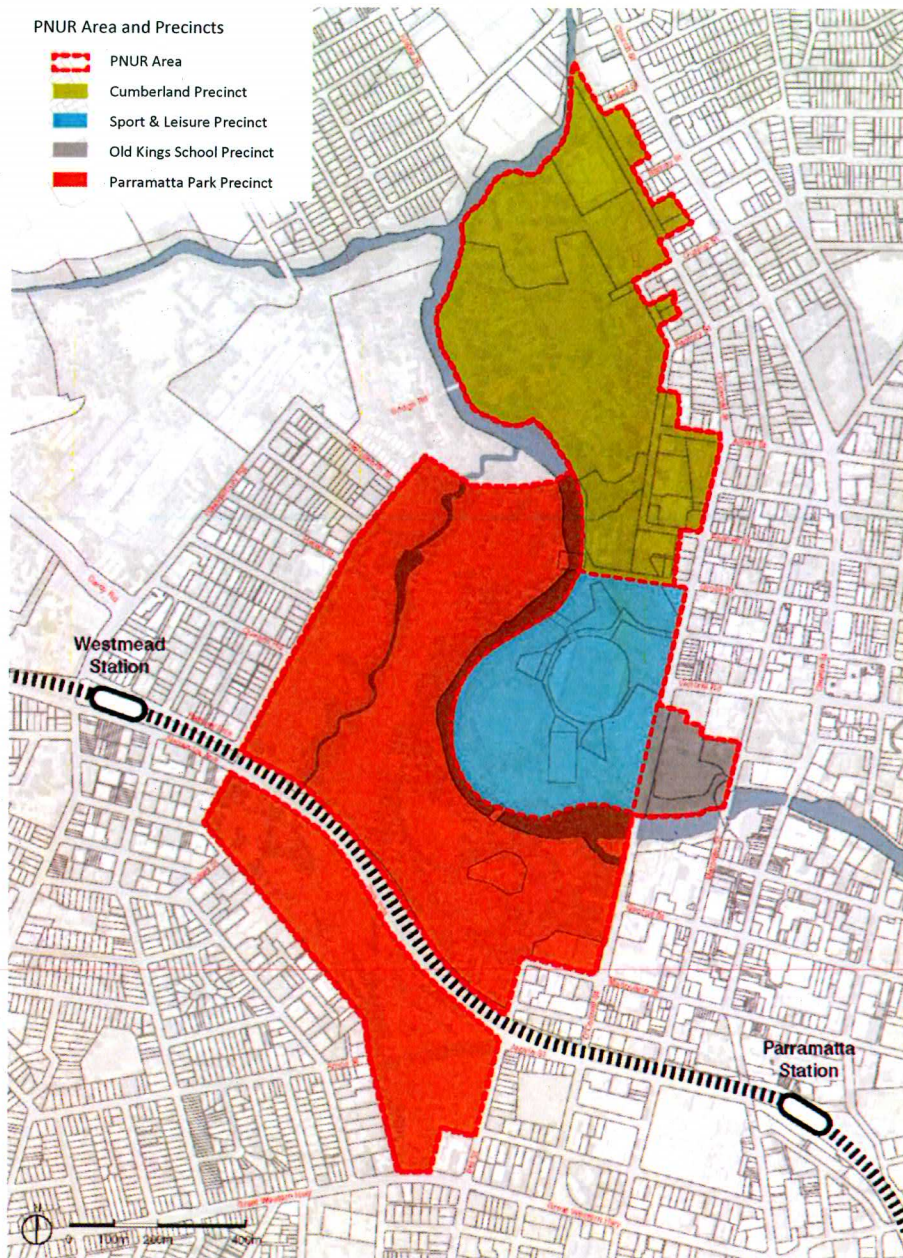


Figure 1 – Parramatta North Urban Renewal Precinct Map

The intent of the proposed new planning framework is to facilitate significant urban renewal in the Cumberland and the Sport and Leisure Precincts. The project aims to create a vibrant heritage mixed-use precinct, largely focussed on housing opportunities. Further, the project aims to honour the rich history of the area, whilst at the same time as planning for the needs of future generations.

The NSW Department of Planning and Environment (who is the relevant planning authority for this proposal) exhibited the proposal by UrbanGrowth NSW for the Parramatta North Urban Renewal precinct from **19 November 2014 until 19 December 2014**. The Department invited submissions from the community and other stakeholders, including Parramatta City Council.

This document is Parramatta City Council's detailed submission in response to the proposal.

## **1.2 Proposal by UrbanGrowth NSW**

It is acknowledged that UrbanGrowth NSW has regularly engaged with Council Staff and Councillors, however this has been the first opportunity to review the proposal in detail.

The UrbanGrowth NSW proposal presents a new planning framework to support rezoning of over 50 hectares of NSW Government owned land within parts of the overall Parramatta North precinct. Rezoning is proposed for portions of the Cumberland Precinct and the Sport and Leisure Precinct. This land has been identified as under-utilised and suitable for comprehensive urban renewal that can both provide for new uses and support established uses on these sites.

The following is a high-level summary of the key features of the proposed new planning framework:

### **a. Cumberland Precinct:**

- i. Retention of existing B4 Mixed Use zone, with rezoning of some additional land to the north from B6 Enterprise Corridor/SP2 Infrastructure (Classified Road) to B4 Mixed Use.
- ii. Rezoning of the central open space area to RE2 Private Recreation.
- iii. Removal of the FSR control and introduction of a GFA control by development lot.
- iv. Approximately 4,100 dwellings.
- v. Heights up to 30 storeys.
- vi. Approximately 28,000 sqm GFA of adaptive reuse of retained heritage buildings.
- vii. Up to 4,000 sqm GFA of retail space (new village centre).

### **b. Sport and Leisure Precinct:**

- i. Rezoning a portion of land surrounding the stadium (to the east and north) from RE1 Public Recreation and RE2 Private Recreation to B4 Mixed Use.
- ii. Introduction of a height control and GFA control by development lot (for the land being rezoned).
- iii. Approximately 34,000 sqm GFA of mixed use (likely to be predominantly commercial).
- iv. Heights ranging from 4 to 8 storeys.

The key features of the proposal are identified in the Indicative Layout Plan, a copy of which is provided below.

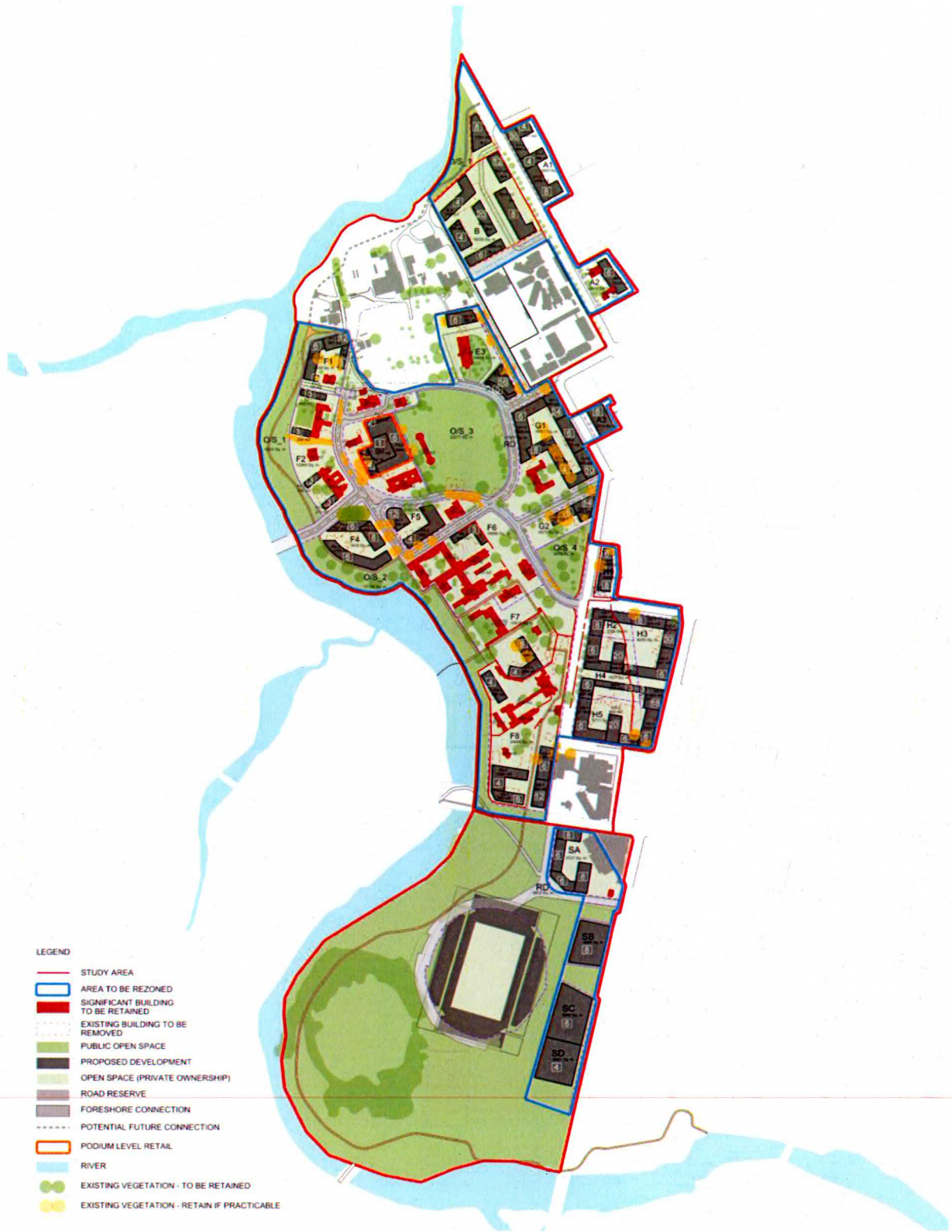


Figure 2 – Indicative Layout Plan

The exhibited proposal consists of a Summary Report, Planning Report, Draft SEPP (to amend the LEP), proposed amendment to the *Parramatta Development Control Plan 2011* and a number of technical studies. The Summary Report outlines the proposed new planning controls and key findings of the technical studies that relate to urban design, heritage, traffic, and biodiversity. The Planning Report and technical studies have more detailed information.



Figure 3 - Artist's Impression: Cumberland Precinct, view across Parramatta River (looking north)



## Part 2 – Strategic Assessment

### 2.1 Guiding Principles

At its meeting of 8 September 2014, Council adopted the following set of guiding principles, which were used in consulting with UrbanGrowth NSW in the development of draft planning controls for the precinct:

- a. Restore and renew heritage buildings within the precinct.
- b. Create a vibrant mixed use precinct, with high quality built form that integrates well with existing heritage and achieves design excellence.
- c. Provide a high quality and connected public domain, which provides public access through the precinct and also to the river foreshore.
- d. Ensure that planning for the precinct adequately considers the recreational, educational, cultural and social needs of the new community, including any impact on the provision of supporting infrastructure and public facilities.
- e. No exemption from Section 94A contributions payable, so as to ensure funds can be provided towards new infrastructure and public facilities.
- f. The provision of Light Rail through the precinct, to connect with Westmead, the Stadium Precinct and the Parramatta CBD.
- g. Create a vibrant, world class sports and entertainment precinct, incorporating Parramatta Stadium and surrounding recreational features.
- h. Ensure that the Parramatta Sports Precinct is highly visible and prominent from O’Connell Street and is surrounded by compatible and complementary uses.
- i. The inclusion of proper infrastructure to support the proposal including schools and public education facilities.

The following table presents a high level strategic assessment against each of Council’s guiding principles for the precinct.

Council Guiding Principle	‘High-Level’ Strategic Assessment Comment
Restore and renew heritage buildings within the precinct.	All 25 buildings identified as having Exceptional significance and all 22 buildings of High significance are to be retained. Buildings to be demolished comprise 15 of Moderate significance and 32 of Little significance. The remaining 8 buildings to be demolished have no rating of heritage significance. It is not clear however how buildings to be retained will be restored as part of the overall redevelopment, including staging.
Create a vibrant mixed use precinct, with high quality built form that integrates well with existing heritage and achieves design excellence.	The proposal will allow for the creation of a vibrant mixed use precinct, including a new village centre. Taller building forms are generally located away from significant heritage buildings

	and view corridors. A key design principle is to allow for a built form distribution that balances the need to activate existing heritage whilst also providing appropriate landscape curtilage. Bonuses for height or GFA are not proposed for design excellence, instead design excellence will be expected for all development.
Provide a high quality and connected public domain, which provides public access through the precinct and also to the river foreshore.	The proposal does allow for a connected public domain, which will provide public access through the precinct and also to the river foreshore. It is unclear however how this will be delivered, including staging. Some concern is raised about the proposed RE2 Private Recreation zoning of the central open space area (O/S 3), as this would appear to conflict with the intent to make this a public park (see detailed assessment in Part 3 of this submission).
Ensure that planning for the precinct adequately considers the recreational, educational, cultural and social needs of the new community, including any impact on the provision of supporting infrastructure and public facilities.	A Community Needs and Impact Assessment (Social Impact Assessment) has not been prepared. The Baseline Assessment of Social Significance prepared relates to heritage values, rather than the recreational, educational, cultural and social needs of the new community. The proposal does allow for a number of infrastructure upgrades, including open space embellishment, a foreshore pedestrian trail and a shared cycle path. However, the proposal does not include built facilities for broader community use, though opportunities may arise through the detailed development phases, particularly relating to options for adaptive reuse of heritage buildings.
No exemption from Section 94A contributions payable, so as to ensure funds can be provided towards new infrastructure and public facilities.	No exemption from Section 94A contributions has been sought by UrbanGrowth NSW. Payment of Section 94A contributions through the development life of the project will fund new infrastructure and public facilities.
The provision of Light Rail through the precinct, to connect with Westmead, the Stadium Precinct and the Parramatta CBD.	The precinct should be supported by Light Rail given the introduction of 4,100 dwellings and the new village centre. This has not been included in this proposal, which is of significant concern.
Create a vibrant, world class sports and entertainment precinct, incorporating Parramatta Stadium and surrounding	The proposal provides for a mixed use zone in close proximity to Parramatta Stadium. It is unclear how this area will redevelop and

recreational features.	whether this will help to fund new sport and community facilities.
Ensure that the Parramatta Sports Precinct is highly visible and prominent from O'Connell Street and is surrounded by compatible and complementary uses.	Greater certainty should be provided to ensure compatible and complementary uses are located within the sports precinct as well as to safeguard visual prominence of the sports precinct from O'Connell Street. Concern is raised that the proposed B4 Mixed Use zone along O'Connell Street will set an expectation for residential development, which is considered to be an inappropriate and incompatible land use in close proximity to the stadium.
The inclusion of proper infrastructure to support the proposal including schools and public education facilities.	No schools or public education facilities are proposed within the precinct, despite the introduction of 4,100 dwellings.

Table 1 – 'High-Level' Strategic Assessment of UrbanGrowth NSW Proposal

## 2.2 Council Resolution – 15 December 2014

At its meeting of 15 December 2014, Council considered a report on the proposal by UrbanGrowth NSW for Parramatta North. Council resolved at this meeting to make a submission to the Department of Planning and Environment in relation to the proposal. The Council resolution raises the following broad, 'high-level' strategic matters:

1. **Heritage** – It is not clear how heritage buildings to be retained will be restored, including staging.
2. **Public Domain** – It is not clear how upgrades to the public domain, including access along the river foreshore, will be delivered, including staging.
3. **Recreational, Cultural and Social Needs** – Further analysis of the recreational, educational, cultural and social needs of the new community, including any impact on the provision of supporting infrastructure and public facilities is needed.
4. **Transport Infrastructure** – The precinct should be supported by Light Rail given the introduction of 4,100 dwellings and the new village centre.
5. **Sports Precinct** – Greater certainty should be provided to ensure compatible and complementary uses are located within the sports precinct as well as to safeguard visual prominence of the sports precinct from O'Connell Street. There is concern that the proposed B4 Mixed Use zone along O'Connell Street will set an expectation for residential development, which is considered to be an inappropriate and incompatible land use in close proximity to the stadium.

6. **Education** – The proposal has not identified any new school infrastructure, despite the introduction of 4,100 dwellings.
7. **Prioritisation** – The proposal should help to facilitate Council’s planning proposals in the Parramatta CBD area, which together with the UrbanGrowth NSW proposal will help to facilitate growth of the wider CBD area.

Further to the above, the Council resolution of 15 December 2014 requires this submission to raise any technical issues as identified by Council officers in a detailed review. These detailed issues are included in Part 3 of this submission. Moreover, in relation to open space provision, the Council also resolved as follows:

*“Council request in its submission that the central public space area identified as “O/S 3” in the Indicative Layout Plan be dedicated to Council free-of-cost, including no reduction in section 94A contributions payable for future development in the precinct, and that it be zoned RE1 Public Recreation accordingly, subject to the removal of any legislative requirement to acquire the land.”*

This issue is discussed in more detail in the open space and recreation analysis undertaken in Part 3 of this submission.

## Part 3 – Detailed Assessment

This part of the submission provides a detailed assessment of the proposal as undertaken by Council officers. Council requests these matters be addressed prior to finalising this proposal. Council officers would be pleased to work with representatives from the Department of Planning and Environment and UrbanGrowth NSW to work through these matters in more detail. This part covers analysis in the following areas:

- Social Outcomes
- Open Space and Natural Resources
- Recreation Provision & Needs
- Stadium and Sports Precinct
- Heritage and Interpretation
- Tourism
- Traffic and Transport
- Urban Design
- Planning
- Economic Development
- Environmental Outcomes
- Flooding
- Contamination

### 3.1 Social Outcomes

#### 3.1.1 Social Impact Assessment

A Community Needs and Impact Assessment ('Social Impact Assessment') is required as part of Parramatta City Council's *Social Impact Assessment Guidelines* for a proposal containing more than 100 dwellings (outside of the CBD). The proposal makes no reference to a Social Impact Assessment having been prepared despite reference to 'extensive stakeholder engagement and community consultation' being undertaken.

#### 3.1.2 North Parramatta Population

Based on calculations by Council staff, the existing and projected population for the North Parramatta precinct, as it currently is, are outlined below:

- *Parramatta North population (2014)*  
Residents – 13,276
- *Parramatta North population (projected to 2036)*  
Residents – 13,910 = +4.77%

Given that 4,100 new dwellings, with a total of at least 8,000 new residents, will be created in the north-eastern section ('Cumberland Precinct') of the North Parramatta Urban Renewal area, it can be anticipated that the resident population in the Cumberland Precinct area will increase more than the ID data 'forecast' tool which has been used to reflect the projected resident population of 4.77% for North Parramatta for 2036.

Given this significant increase to forecast growth, a development of this magnitude requires modelling and specific information on estimates of the demographics of the potential future population.

### 3.1.3 Current North Parramatta Demographics

Demographics	Comment
30.8% of households had 1 person while 32.6% of households had 2 people	Currently one and two person households dominate this area. This should be considered when planning residential dwellings
29.0% of households are lone person households, 24.8% of households are couples with children and 20.6% of households are couples without children	There is a mix of household types currently living in North Parramatta. This mix should be considered in the planning of the Parramatta North precinct
52.6% of residents currently drive to work, while 16% catch the train and 6.9% catch the bus	Traffic considerations should be taken into account with the proposal to ensure that congestion can be mitigated against
5.3% (626) of residents in North Parramatta need assistance with core activities	Accessibility should be considered in the planning of these precincts

### 3.1.4 Community Services/Facilities

The location of the proposal is close to important social infrastructure such as:

- Educational facilities/opportunities
- Employment opportunities
- Medical facilities
- Community services
- Schools
- Shops
- Transport
- Open Space

However with an additional 4,100 residential dwellings anticipated, the impact on existing services needs to be considered so that existing residents can continue to be accommodated and new residents can also access sufficient services.

Adequate childcare and school facilities will need to be available to assist with young families given the increase in demand. These should be catered for in the precinct.

Further, a considerable number of companion animals such as dogs and cats will come into the area. Is there adequate space for the dogs to recreate and be safely off leash?

### 3.1.5 Construction Time Impacts

The timeframe for construction is estimated to be between 15 and 20 years. Modelling for this period of time will need to be undertaken to be able to adequately consider the potential positive and negative impacts for the new and existing communities throughout, and ensure adequate mitigation strategies have been considered to minimise construction impacts.

### **3.1.6 Proposed Building Heights Impacts**

Access to adequate natural light improves people's health and overall wellbeing. Adequate modelling of the shadow effects needs to be provided so that a full understanding of the building heights can be reflected for all times of the day and a full understanding of the shadowing impacts can be gained/known.

### **3.1.7 Housing Costs**

The price of residential dwellings is likely to continue to rise, especially in the context of the significant growth and development being proposed by this project. This will likely make it difficult for low to moderate income earning households who have been renting in the North Parramatta area to remain in this location.

### **3.1.8 Affordable Housing**

No reference is made within the new Planning Framework report to Affordable Housing being provided in this development. With an insufficient amount of affordable rental and purchase properties available within the Parramatta Local Government Area (LGA), development of this size and scale and location is ideally placed to have an Affordable Housing component within the dwelling mix. Inclusion of Affordable Housing was also raised as desirable by stakeholders in the Stakeholder Engagement Program. Further, Action 2.3.3 of the Government's new metropolitan strategy, "A Plan for Growing Sydney" states that the "Government will... provide affordable housing in Government-led urban renewal projects and on Government-owned sites to meet the shortfall in affordable housing". Council is concerned that this has not been proposed in this precinct.

### **3.1.9 Recommendations**

A Community Needs and Impact Assessment ('Social Impact Assessment') is required in order to more fully understand the potential issues and opportunities with this large scale development for the target market and the wider community.

At a minimum the Social Impact Assessment should cover:

- The projected mix of new residents – expected age profile, household types, and ethnic background
- Modelling the potential impacts (positive and negative) for the new community and neighbouring areas over the estimated fifteen (15) year time frame for construction of the 'Cumberland Precinct' in particular ( e.g. communication strategies that will be put in place)
- How a sense of 'community and belonging' will be developed and supported for the large number of estimated 'new residents', as well as between the proposed development and existing community
- How social services infrastructure will likely be impacted, and the capacity of essential social services to be able to accommodate and support the needs of a large new community – e.g. education facilities including primary and high schools.
- How the development will accommodate accessible design principles to ensure accessibility for all people within the local community
- The potential impact of local large scale growth and public domain improvements on local housing affordability

Further, a significant opportunity exists to allocate dwellings for affordable housing within this precinct for key workers in local employment, for example administrative, cleaning and allied health staff working at the Westmead Medical Research and Hospital precinct, which is located close by.

## **3.2 Open Space and Natural Resources**

The precinct features a permanent Grey-headed Flying Fox (GHFF) camp and approximately 1.4km of riparian corridor along Parramatta River and Darling Mills Creek which are of ecological significance. The precinct proposes 4,100 new dwellings and will facilitate both opportunities and conflicts with these ecologically significant features.

### **3.2.1 Parramatta River & Darling Mills Creek Riparian Corridor**

The precinct is bounded to the west by the Parramatta River and Darling Mills Creek. This riparian corridor functions as an important transition between the upper and lower Parramatta River catchment and provides habitat for present threatened species (Grey-headed Flying Fox, East-coast Freetail Bat and Eastern Bentwing Bat) and an endangered ecological community (Riverflat Eucalypt Forest) listed under the *Threatened Species Conservation Act 1995*.

This section of Parramatta River is a 4<sup>th</sup> order stream, with Darling Mills Creek a 3<sup>rd</sup> order stream as defined by the Strahler stream ordering system whereby numbering begins at the top of a catchment. The following minimum vegetated riparian zones (VRZ) are required in accordance with the NSW Office of Water '*Guidelines for riparian corridors on waterfront land*':

- Parramatta River (40m)
- Darling Mills Creek (30m)

It is recognised that existing buildings of heritage significance are located within these recommended VRZ. However the location of new buildings, carparking and other significant infrastructure should be located outside of these VRZ to minimise impacts on riparian vegetation and threatened species, reduce the visual impact of the built form on Parramatta Park, and to provide a buffer zone in accordance with Section 2.4.7 (Biodiversity) of the *Parramatta Development Control Plan 2011*.

The study for the precinct recognises the environmental importance of this riparian corridor and aims to '*protect areas with high environmental value, such as the riverbank corridors*' and proposes a riparian corridor / foreshore park of varying widths along the Parramatta River and Darling Mills Creek. The proposed retention of B4 Mixed Use zoning along the proposed foreshore park is inappropriate in consideration of its environmental significance and does not reflect current and future landuse. It is also inconsistent with the zoning of similar riparian open space in the Parramatta LEP (The LEP that applies outside of the CBD).

### **3.2.2 Recommendations**

- Rezone Parramatta River 40m / Darling Mills Creek 30m riparian corridor (O/S 2) to W1 (Natural Waterways) / RE1 (Public Recreation) excluding existing heritage buildings.

### **3.2.3 Grey-headed Flying Fox Camp**

The Ecological Assessment prepared by ELA highlights the presence of a permanent Grey-headed Flying Fox (GHFF) camp consisting of 10,000 to 20,000 individuals based on seasonal movements. It is a known breeding and roosting site stated as '*critical to the survival of the species as identified in*



the Draft National Recovery Plan for the species'. This camp currently occupies a 600m section of riparian corridor north from Eels Place within the precinct.

Clause 6.4 (Biodiversity) of the LEP specifies provisions for the protection of significant fauna/flora on private land consistent with the PNUR Ecological Management Plan.

A recent review of the NSW Flying Fox Camp Management Policy (2014) has highlighted the significant conflicts between GHFF camps and residents in close proximity. The precinct proposes a number of new residential buildings in close proximity to the GHFF camp which will result in impacts such as noise, odour, sleep interruption, and droppings on private residences. This will create an unresolvable conflict between future residents and the existing GHFF camp.

It is also likely in the future that the existing GHFF camp may expand or move further south or north along the Parramatta River corridor in response to roosting availability. To minimise future conflicts between residents and the GHFF a sufficient buffer needs to be provided allowing for camp expansion through concentrating residential development to the east of the site and minimising development in the west of the site. A number of the proposed new buildings situated along the interface with the Parramatta River corridor should be relocated.

### 3.2.4 Recommendation

- Relocate 3 buildings away from the open space interface in F8 and F4 to reduce current / future environmental health conflicts with GHFF (see Figure 4 below).
- Add the GHFF Camp (Ecological Management Plan – Figure 8) to the 'Natural Resources—Biodiversity Map' in Parramatta LEP 2011.

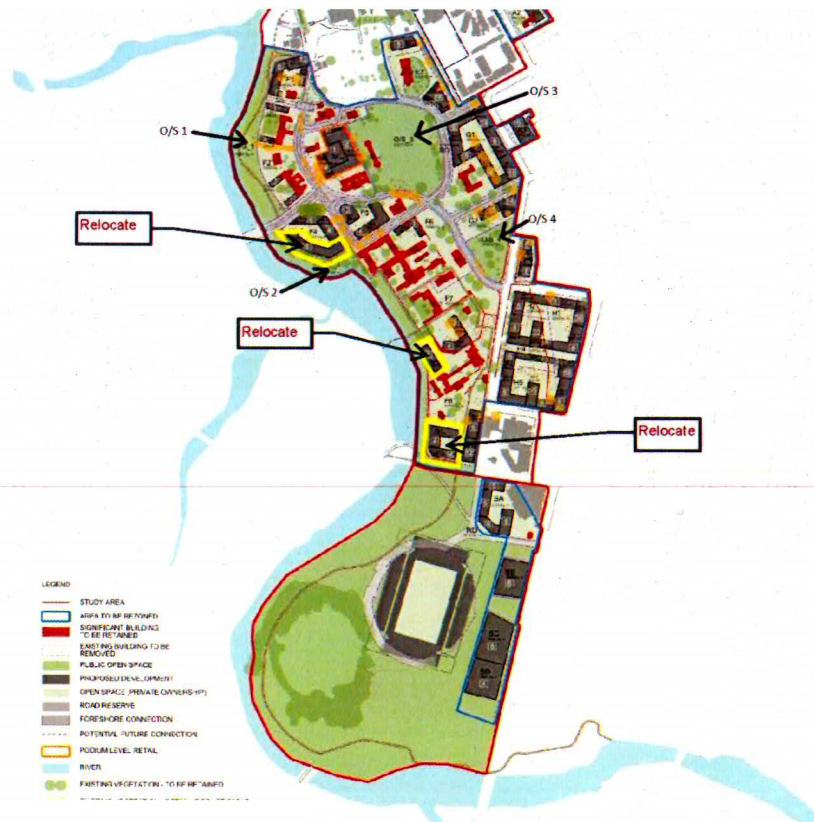


Figure 4.3.5.2 ILP PNUR

Figure 4 – Recommended building relocations to avoid conflicts with GHFF

### 3.2.5 Open Space

There are four designated open space/park areas, marked O/S 1, O/S 2, O/S 3 and O/S 4, ( refer to Figure 4 above for the locations) in the masterplan. O/S 2 forms part of the GHFF camp so it cannot be considered to be a formal recreational park. The masterplan should be amended to find an additional area within the site for development into a traditional park with picnic facilities, play equipment and the like.

### 3.2.6 Recommendations

- No park infrastructure should be constructed within the area marked O/S 2 as it is in proximity to GHFF camp.
- Provide additional playgrounds in O/S 1 and expand this open space area within the masterplan to offset the O/S 2 park area located under the GHFF camp.

## 3.3 Recreation Provision & Needs

The density proposed for this precinct is consistent with an inner city urban environment. There will be more people in a smaller space, requiring access to high quality recreation and open space opportunities that contribute significantly to their overall wellness and health attributes. The liveability of the area will have a major impact on those future residents.

The Landscape Re-zoning Report identifies key open space and recreation augmentation to the precinct based on a combination of environmental, heritage and desired development objectives and attributes.

As this urban renewal area is also home to an important heritage precinct its planned restoration and enhancement will likely increase visitors on a regional context to the site. Capacity of the recreation and open spaces planned for visitors, workers and residents will therefore be important in future planning. Further, the preferences and needs of future users will also influence the makeup of recreation and open spaces.

In addition to the needs of the new residents, many of the spaces within the Renewal Area are by nature regionally significant and destinational – including Parramatta Park, Pirtek Stadium, the Parramatta Memorial Swimming Pool and heritage sites. Activation and unlocking of the River itself will also likely enhance the area's appeal as a destination. As such, the area provides significant recreation, open space, cultural, entertainment and heritage attractors to people from across the City, Western Sydney region, Greater Sydney and beyond. Their capacity to meet the needs of local residents and regional users must be assessed.

### 3.3.1 Commentary on Recreation and Open Space proposed

The Landscape Re-zoning Report provides details of a number of site constraints (heritage and environmental) alongside development objectives which form the basis of what space is to be dedicated to recreation and open space, translated into a landscape master plan.

Chief recreation and open space features of the proposal include:

- Maintain significant view vistas and visual corridors
- Continuous riparian corridor and riverside walk alongside Eastern bank of the River with passive recreation embellishment (O/S 1 and O/S 2)
- Heritage Oval Park – Village Green (O/S 3)

- Entrance Park on Fleet Street (O/S 4)
- Retention and enhancement of curtilages to heritage buildings
- Various restoration to riparian corridor segments

The landscape master plan has a number of attractive and considered features using the limited spaces available. It should be noted that the remaining space for recreation (approximately 4.46 ha out of 40 ha or approx. 11%) is quite small and particularly small for a population of 8,000 plus residents (approximately 0.56 ha of open space per thousand people).

Traditional open space guidelines suggest at least 2.83 ha per thousand people and 9-15% of total non-industrial land should be allocated to open space. On this measure, the proposal is fairly low and would rely on residents accessing nearby local and regional facilities and open space to meet their recreation and open space needs.

Fortunately residents will have easy access to nearby Parramatta Park (formal and informal sports areas, pathways, seating, BBQ and picnic facilities etc) and the Stadium and Sports Precinct (pathways, river foreshore, swimming pool, formal and sports field (Old Kings Oval)). As previously noted, these precincts have regional context and host users from a much larger catchment. Their capacity to also handle a proportion of "local" use by 8,000 new nearby residents in addition to significant numbers already placing demand on those park services may require further planning and consideration of capital works, maintenance and capital replacement programs within those areas.

Typically, the broad recreation and open space needs of a community will translate into an array of assets (some with programming and services):

- Formal Sporting Fields
- Informal ball sports and multisport areas (including tennis)
- General play and fitness (playgrounds and outdoor fitness)
- Shared paths and trails (walking and cycling)
- Passive recreation (parks, natural areas, gardens)
- Aquatics (indoor/outdoor)
- Indoor sports and recreation
- Private recreation (i.e. commercial gymnasiums)
- Protected areas (conservation zones)
- Activation zones (for events, markets and similar)

The landscaping embellishments proposed will provide an area of high amenity to complement the remaining heritage buildings and proposed new buildings. There are a number of features which will certainly provide some amenity for residents and visitors, including:

- Shared pathways that provide excellent connections and are well integrated with natural elements such as the river riparian corridor and with exercise stations, seating and drinking fountains.
- A network of exercise stations along the shared pathway series will also benefit most age demographics, as long as the equipment chosen considers a broad range of physical capabilities and interest.
- Gardens, natural areas and views vistas – provide suitable quiet and natural spaces which are valuable for residents wishing to connect with green spaces.
- Interpretive play, public art, BBQ and picnic facilities – interesting spaces for children and families as well as other age groups and profiles.
- Informal play – a number of spaces such as the Entry Park, Informal Lawn and the Village Green Oval which provide passive informal park areas that might allow for various outdoor activities.

- Activation Spaces – A number of locations could be further activated for local neighbourhood events such as markets, open air cinema and community events. O/S 3 is the most suitably sized and well located for such activation, but there may be a clash of uses with formal and informal sports.
- Children’s play – The Report does not specifically identify playgrounds for any of the areas. Specific playground amenities for young families will be important to this community and also visitors to the heritage precinct. A population of this size will require suitably large scaled play facilities within the precinct.
- Formal Sports – The Village Green oval (O/S 3) has been maintained within the master plan. It is a very small sports field (approx. 110 x 75 metres) and will require augmentation and embellishment to meet Council’s requirements.

Given the small size of the Village Green (O/S 3), it is unlikely to meet the full range of recreational sporting needs generated by the new community. It is clear therefore that this new community’s formal and informal sporting needs will impact on neighbouring sportsgrounds in the LGA such as nearby Belmore Park, Doyle Ground, Old Saleyards Reserve, Dan Mahoney Reserve, Old Kings Oval (Stadium Precinct) and Parramatta Park fields (e.g. Coleman Oval and Long Paddock should they be upgraded). Many of these facilities are already close to capacity and under stress due to significant population growth in and around the City.

Solutions to increase the capacity of sportsgrounds may include the enhancement of playing surfaces, adoption of synthetic playing fields and other site improvements which will allow increased capacity for use. This is where section 94A contributions from the development could assist with funding these upgrades.

The new community’s recreation demand for indoor recreation and aquatics will add to the considerable existing need identified for the City overall. The nearby Parramatta Memorial Swimming Pool will provide interim outdoor aquatic experiences but it is well known that there is a lack of indoor facilities within the LGA and concerns over future capacity of the existing pool to meet increasing demand for various aquatic trends. Council continues to investigate options for future provision of indoor recreation and aquatics in the City. Options include re-developing the current swimming pool site.

It should be further noted that the current swimming pool has been located at this site for over 50 years and is well utilised by the community and is much loved. Council has undertaken extensive capital investment over many years, including a \$9.8 million refurbishment in 2008/2009. Changing the nature of this facility or relocating it (should that ever be proposed) would require extensive public consultation. It would also require appropriate and significant non-council funding contributions by the NSW Government or developers to deliver any changes and ensure the community has suitable provision and amenity into the future.

Council notes also that the Parramatta Memorial Swimming Pool’s car park and adjoining Parramatta Park car park in the south of the Stadium and Sports Precinct are earmarked for general recreation spaces (re-vegetated foreshore). In a separate report on the Stadium and Sports Precinct, further comments have been supplied, however it is important to note that the car park is extremely important to the operation of the Swimming Pool in its current configuration. This zone is implicitly connected with the swimming pool facility and even sporting fields such as Old Kings Oval. Therefore it recommended that no change occur to the car park unless it is part of any agreed changes to the public swimming pool.

The new community and surrounding residents may also create demand for private recreation facilities such as a commercial gymnasium. Such facilities are often easily catered for within a mixed use commercial and residential development envelope and the market will likely identify and meet that need accordingly.

UrbanGrowth NSW is proposing to zone the Village Green (O/S 3) as RE2 Private Recreation. The justification provided for this proposed zoning is that it will offset the land within the Sports and Leisure Precinct that is currently zoned RE2 Private Recreation that is proposed to be rezoned to B4 Mixed Use. Further, UrbanGrowth NSW states that the *“application of the RE1 Public Recreation zone is not proposed as at this stage no appropriate government authority has agreed to the future ownership and management of the park.”*

Given that the Village Green (O/S 3) area has been identified as public open space and will become critical to the future open space needs of the new and existing local communities in North Parramatta, it would seem appropriate that this area should be zoned RE1 Public Recreation and dedicated to Council in the long term. This dedication should be done at no cost to Council, including no reduction in section 94A contributions for future development in the precinct and removal of any legislative requirement to acquire the land.

Likewise, consideration should also be given to O/S 1, O/S 2 and O/S 4 being dedicated as public open space, zoned RE1 Public Recreation (subject to no cost to Council, no reduction in Section 94A contributions and removal of any requirement to acquire the land) and not left as B4 Mixed Use zoning for consistency of management and land use throughout the precinct.

### **3.3.2 Recommendations**

- Support broadly the master plan for recreation and open space provided by UrbanGrowth NSW – in particular the activation of river foreshore connections that serve the broader community.
- That the central Village Green Oval identified as “O/S 3” in the Indicative Layout Plan be dedicated to Council free-of-cost, including no reduction in section 94A contributions payable for future development in the precinct, and that it be zoned RE1 Public Recreation accordingly, subject to the removal of any legislative requirement for Council to acquire the land.
- That Council and UrbanGrowth NSW further consider which other recreation and open space elements (O/S 1, O/S 2 and O/S 4) should be zoned RE1 Public Recreation and dedicated to Council (free-of-cost, no reduction in section 94A payable and removal of any legislative requirement to acquire the land) and a plan for who and how these spaces will be managed and maintained going forward.
- That UrbanGrowth NSW consider amending the plans to better account for play and design elements for children and young people.
- That UrbanGrowth NSW explore options to include informal multi-sport play features (e.g. outdoor courts) within the precinct footprint.
- That Child and Young People Friendly by Design principles are adopted within the development framework of each development and also in the planning of recreation and open spaces.
- That Council supports further investment by the State Government to fund enhancements and ongoing maintenance of Parramatta Park (heritage and recreation zone west of the river) to cater for the likely strong additional demand that this new community will place on the Park’s infrastructure.

- That Council does not support any significant encroachment into the Stadium and Sports Precinct or significant reliance on its open space to meet the needs of the new community given its dual role as an activation and event precinct.
- That enhanced aquatic and recreation facilities are required to service the new residents of Parramatta North along with the other nearby growing City Centre areas.
- That significant non-council funding will be required to enhance the aquatic and recreation provision available and in particular should the existing site be required to relocate in the future, further non-council funding be secured to deliver suitable facilities at a desirable location for the community elsewhere.
- That the Swimming Pool car park is retained whilst the pool remains in operation on the site.



Figure 5 – Artist's Impression of the main open space in the Cumberland Precinct

## 3.4 Stadium and Sports Precinct

### 3.4.1 Background

The value of Pirtek Stadium and its event activation function to the City has been enhanced significantly in recent years with the establishment, success and popularity of the Western Sydney Wanderers. Alongside the Parramatta Eels, the two primary hirers of the venue generate significant visitation, cultural, social, recreation and economic benefits for the City. Furthermore, the attributes of the City with the Stadium located close to highly accessible public transport and an entertainment precinct provide the Eels and Wanderers followers (and away fans) a substantial and overall experience that is highly desirable.

The growth of the Stadium and number of events brought to the City feeds the growth of the City and vice versa with many mutual benefits being shared.

Furthermore, the NSW Government's published stadia strategy states its desire to identify and invest in a single major sporting venue for Western Sydney to support its other key stadia infrastructure of ANZ Stadium, SCG and Allianz Stadium. Other suburban stadia is then planned to be rationalised and downscaled over time.

Pirtek Stadium is well placed to be identified as the NSW Government's location of choice for significant investment given the City's complementary offerings and strategic location. Should it not be supported for such future investment, its future and the key benefits brought to the City from activation currently enjoyed through Eels and Wanderers games will be lost.

It is therefore critical that for Pirtek Stadium to be identified and receive the substantial funding needed, that the case is made that its plans for the nexus of Stadium, surrounding precinct and City infrastructure offer the most compelling and sustainable proposition.

Whilst recent announcements and commitments provide some suggestion that there is government support to invest in Parramatta Stadium, a number of hurdles remain.

Challenges and opportunities that must be addressed to enable this include:

- Resolve fragmented and disjointed land ownership within the precinct.
- Develop a precinct solution – an integrated precinct master plan that delivers a world class stadium desired by fans and hirers (potential future and current) in addition to advancing the brand and reputation of the City on a domestic and international scale – all the world's most successful stadiums have effective, dynamic precincts that aid to the destination attributes of the event itself.
- Such features would focus on enhancing the experience provided to all involved, including superior facilities for players and officials, superior facilities for spectators, broadcasters and the media, best practice use in technology to connect people and create an exciting atmosphere, and superior non-match activation before and after the event.
- Resolve current land use and asset mix that better supports an expanded stadium (increased crowd capacity) and complementary supporting precinct asset mix
- Resolve current entry and exit issues for pedestrian and vehicular traffic
- Enhance transport and pedestrian linkages to the city, parking and public transport
- Enhance the entertainment and complementary uses surrounding the stadium
- Develop a model that is economically sustainable and delivers desired financial outcomes for the venue owner/manager and hirers
- That activation within the precinct can be ongoing seven days a week
- Integrate Light Rail into the precinct

Council continues to play a strong advocacy role on behalf of the City supporting the various stakeholders and land owners to the ultimate objective of an enhanced Stadium and complementary and integrated precinct.

Further to the above, Council is the lessee of Parramatta Park land which the Parramatta Memorial Swimming Pool and car park are located. This is a significant community asset, providing important amenity to the community for over 50 years and having benefited from substantial capital investment and upkeep during that time by Council.

Council also has identified the growing need of its community for indoor recreation and aquatics which currently there is none within the local government area or close to the rapidly growing city CBD. There have been many discussions regarding potential for this to be located within the Stadium and Sports Precinct should there be a redevelopment of the existing swimming pool.

### 3.4.2 Comments

Greater certainty should be provided to ensure compatible and complementary uses are located within the sports precinct as well as to safeguard visual prominence of the sports precinct from O'Connell Street. There is concern that the proposed B4 Mixed Use zone along O'Connell Street will set an expectation for residential development, which is considered to be an inappropriate and incompatible land use in close proximity to the stadium.

It is clear that further detailed planning and consideration of major challenges and opportunities is required to inform a more considered strategy and planning proposal supporting an integrated world class stadium precinct. The key stakeholders agree and are in the process of undertaking these further investigations, which may lead to a different planning proposal for the Stadium and Sports Precinct.

Additionally, development objectives for the Cumberland Precinct (i.e. residential development yield) should not rely on or be overly tied to the Stadium and Sports Precinct given the specific and unique drivers associated with managing a significant event and entertainment precinct, complemented by supporting commercial and community uses.

Council submits that Urban Growth should consider how to address the following matters:

- The mixed use zone in front of the stadium allows for residential development in front of the stadium – Council does not believe residential use in such close proximity to a well utilised stadium is appropriate (future issues of noise, traffic and other impacts on those potential residents and so forth). Any type of development in front of the stadium is likely to diminish the opportunity for an attractive frontage to and circulation around the Stadium, inhibiting its future operation and function.
- The zoning of the Stadium (RE2 Private Recreation) and immediate surrounds (RE1 Public Recreation) do not allow for any complimentary commercial uses. Further assessment of what the right types of complementary development and activity might be for this precinct, and therefore what zoning and built form is best suited for those identified purposes, should be undertaken and implemented through a masterplan for the site.
- A car parking and pedestrian traffic plan is critical to solve current access issues that will only be exacerbated if the stadium is expanded to 35,000 plus capacity (egress for medium to large events is a significant concern given most pedestrian and vehicles all access the site from a narrow north eastern aspect – at least 180 degree access and separated vehicle and transport egress is considered best practice).
- Integration of light rail, bus interchange and other civic space would be beneficial to the precinct's function as a major entertainment precinct.
- Implications for the community swimming pool and whether future recreation needs are feasible to be delivered within the precinct.
- Access and parking for the community swimming pool and other community and commercial spaces within the precinct given the proposal to remove and then revegetate over the southern car park that services the swimming pool and open spaces.
- Further investigations recommended into identified heritage significant land to the north of the stadium and west of the Leagues Club car park (site of old Water Mill and Races) to better clarify whether this zone could also have development potential complementing the stadium and precinct (currently not considered for rezoning)

### 3.4.3 Recommendation

- That Urban Growth address the above matters.



### 3.5 Heritage and Interpretation

The following concerns are raised in relation to the baseline assessment of social significance for the precinct:

- The application of criteria for the assessment of significance is not specific enough. The assessment does not adequately justify the significance of the various sites within the precinct. Reference to the report, 'The Cumberland Hospital Fleet St N Parramatta NSW Archaeological Management Plan (Historical Sites) for Conservation Management Plan' (Edward Higginbotham and Associates, March 2009) would help to improve the analysis.
- The report does not set out a rigorous process or criteria for assessment for re-use and associated implementation.
- The report does not use many specific references to actual community groups or propagate a coherent argument relating to which buildings were significant to which groups and why.
- The groupings of significant sites seemed to be aligned broadly with general areas like the Female Factory and Asylum, but the report needs more detail about the significance of individual buildings spread across these precincts. Earlier reports have sited between 10 and 18 distinct precincts in this area. This report has fewer distinct areas than others and the significance of some of these are not mentioned in the report.
- There is no clear outline on how the ongoing management of sites stipulated for re-use will be conducted. Who will be responsible? How will money be found to keep them going? This should be of special concern for sites of exceptionally high significance.
- There could be more of a role for Council who already employs professionals across the museum, archive, interpretation, and tourism sector to provide professional assistance and management for the site more generally. Funding could be dedicated to this purpose.
- Specific recommendations of the framework require more clarity.
- The methodology in the report is very specific and too limited.
- There are important cultural connections that the Darug community members have with several places throughout the area, and need to be consulted with.
- Council is not aware of the people who have been consulted, for example ATSIAC or DRP, nor the feedback that they have given. Adequate consultation must be undertaken in accordance with ICOMOS and Burra Charter guidelines.

There is concern over the lack of detail in the proposal about the process for how significant heritage buildings will be restored throughout the life of the development. Further detail is needed in terms of the Government's staging program for development and how this will facilitate restoration of heritage buildings in the precinct. Council's support for any uplift in yield in this proposed rezoning is subject to a clear commitment and program (including funding) from Government for heritage restoration.

### 3.6 Tourism

There are significant opportunities for facilitating tourism in this development, particularly in the reuse and restoration of significant heritage buildings, proximity to the Parramatta CBD and stadium precinct, and also activation and access to the river. These are discussed in more detail below.

### **3.6.1 Cumberland Precinct**

The following comments are provided in relation to tourism potential in the Cumberland Precinct:

- The Cumberland precinct comprises a number of significant heritage sites with distinct but overlapping stories.
- Together the sites have the potential to attract high volumes of visitors, with associated needs, including food and drink, information, lighting, parking, seating, shelter, toilets, transport and way finding.
- It is important to strike a balance between preserving the heritage sites and securing their long term sustainability.
- It is recommended that some sites be maintained in their current condition and interpreted through organised tours or self-guided tours (with handheld devices), while other sites are adapted for reuse.
- Although the heritage sites have connections with incarceration and the like, it is important that such interpretation or reuse appeals to a broad range of visitors, including families. The emphasis should therefore be on education and entertainment. However, there may be some opportunities for more niche visitor activities, such as ghost tours.
- There may also be potential to hold special events, but this will require appropriate infrastructure.
- To assist with the management and marketing of the heritage sites it is recommended that a single operator is responsible for all sites, with some sub-contractors, for example, food outlets, reporting to that operator.
- A larger not-for-profit heritage organisation, such as Sydney Living Museums or a commercial operator with a track record of managing a heritage site would be well placed to operate the sites, rather than a community based historical group with no experience of visitor management.

### **3.6.2 Sport and Leisure Precinct**

The following comments are provided in relation to tourism potential in the Sport and Leisure Precinct:

- There is the potential to increase the length of stay and spend of visitors to NRL and A-league games, and special events by increasing the range of activities around Pirtek Stadium, for example by providing eating and drinking outlets.
- Improved events infrastructure at Pirtek Stadium would enable the stadium to attract large scale events, such as concerts.
- Consideration should be given to improving the approach to the stadium.

### **3.6.3 Old Kings School**

The following comments are provided in relation to tourism potential in the Old Kings School Precinct:

- The heritage site at Old Kings School precinct, and its proximity to the Riverside Theatre provides an opportunity to develop a new arts centre for Parramatta.
- To ensure the long-term sustainability of such a development, it is recommended undertaking research into potential visitation numbers, and identifying potential commercial uses, such as sub-letting to commercial design companies and arts organisations.

### 3.6.4 Parramatta Park

The following comments are provided in relation to tourism potential in Parramatta Park:

- The Parramatta Park Trust is currently developing a Master Plan that will guide the future development of the park, including opening the Dairy Cottage for tours. The plan should be considered as part of the overall strategy for the Parramatta North Urban Renewal precinct.
- In addition, there is potential for new activities and attractions, such as cycle hire and a “city farm”.
- Cycle hire could be run by a commercial operator and enable visitors to cycle around the park and Parramatta River.

## 3.7 Traffic and Transport

Concerns are raised in relation to the proposed planning framework from a traffic and transport perspective.

The study area for the traffic model does not extend far enough to the south or east to include critical intersections and local roads. If the RMS Mesoscopic model for this area is available then it is recommended that this be used for the traffic modelling. Further investigation is required in regards to upgrade works for the intersection of Cumberland Highway, Church Street and Windsor Road.

The proposal includes up to 9,770 car spaces adjacent to a road network that already has major intersections at capacity during peak periods. To address this challenge, public transport (particularly light rail), bicycles, and walking are critically important. However, radical solutions that go further are required to manage the levels of congestion that are likely to result from the proposed development.

It is recommended that vehicle access onto the network be constrained by limiting the number of exit points and ensuring that they are controlled by signals. Any excess vehicles in peak periods travelling onto the network would then effectively be stored within the site (queuing to exit) rather than queuing on main roads. Additional queuing on main roads is to be avoided as it can result in queuing across intersections (causing increased travel times in all directions) and can effect bus lanes and increase illegal use of bus priority measures (the term gridlock is often used). This strategy needs to be supported by substantial improvements to public transport and a design to minimise the effects on existing residents and organisations in the Fleet Street area.

### 3.7.1 Westmead access

The proposed development should include access to Westmead for pedestrians, cyclists, buses or taxis. Westmead is a substantial centre of employment and also has the most easily accessible railway station for the proposed development. The Traffic and Transport Review does not make any reference for this access to be provided.

### 3.7.2 Proposed traffic works in the Traffic Study

The proposed traffic works are considered to be deficient in the following ways:

- The proposed widening of Church Street between Factory Street and Grose Street (to be undertaken by applicant) may not be able to be achieved for heritage reasons, particularly at the cemetery north of Pennant Hills Road.

- Concerns are raised with the proposed partial signal for Church Street/Board Street, as it is considered to provide no benefit to the network, or increase in capacity, and would increase delays on the main road.
- The proposed additional right turn lane from Church Street to Barney Street is supported but will require land acquisition.
- The Traffic Study notes that the Windsor Road bridge over Cumberland Highway is proposed to be widened as part of the Western Sydney Regional Ring Road. However, the project is unfunded and initial investigations indicate that it is not feasible.
- Concerns are raised with the proposed one lane roundabout at the intersection of Fennel Street and O'Connell Street as it would increase delays on the main road network and reduce capacity. Concerns are also raised about the two lane roundabout as it would provide poor pedestrian safety and amenity, and require substantial land acquisition and probably building demolition in an area of special character.
- The proposed one lane roundabout at the intersection of Dunlop Street and O'Connell Street is appropriate in the initial stages of development, but the intersection should be partially closed as development proceeds (see comments above).
- The list of proposed works in the Draft SEPP Planning Report is different to that in the Traffic Study.

### **3.7.3 Traffic Modelling from the Traffic Study**

The following concerns are raised in relation to the traffic modelling undertaken in the Traffic Study:

- The study grossly underestimates existing traffic queues at key locations, particularly westbound on James Ruse Drive/Cumberland Highway.
- The study indicates a direction split of 27% residential and 35% commercial travelling to the south. Accordingly, the model should be extended to include the intersection of the Great Western Highway and O'Connell Street. Similar extension should be made to the east to intersections as far as James Ruse Drive.
- Traffic model does not include cumulative impact of other development in the area.
- Traffic model does not consider through traffic in local residential streets such as Prince Street, Bellevue Street and Isabella Street, North Parramatta.
- The theoretical capacity comparisons for mid-block locations are not relevant because it is the intersections in the network that determine the capacity.
- Origin-Destination Surveys indicate significant traffic volumes travelling through the site. It is proposed to stop this through traffic but it is not clear if or how this has been included in the traffic model.
- The report does not adequately justify the low traffic generation rates, particularly as the development is currently poorly serviced by public transport and there are no confirmed improvements as part of the application.

### **3.7.4 Pedestrian and cycleway connectivity**

The following comments are made in relation to pedestrian and cycleway connectivity:

- Existing context should include NSW Cycling Futures which highlights Parramatta as a key strategic area for short trip cycling which the study area falls within.
- Bicycle routes maps used show routes which are not endorsed by Council (Figure 3.13) and are outdated (Figure 3.14).

- The proposed route is part of the Parramatta Valley Cycleway and is strongly supported. A pedestrian/ cycle bridge should also link the side with the northern side of Toongabbie Creek and connect to Kleins Road.
- An east/west cycle connection to Westmead and Church Street should also be provided.
- A separated cycle route should link Parramatta Stadium to the Parramatta CBD.

### **3.7.5 Bus and Shuttle Bus Transport**

Bus services frequencies are stated to be approximately 1 minute or less in peak periods. The expansion of the shuttle bus route may be problematic as it will go outside the CBD bus region free area and may not be supported by bus service providers.

### **3.7.6 Light rail**

There is no mention of light rail in the proposal, including station locations, catchments or routes. This is a concerning omission as this will significantly improve the public transport provision for the development. While the report states that the site is currently too far away from the Parramatta Transport Interchange to be considered a Transit Oriented Development (TOD), a light rail station in the precinct will enable TOD to be investigated which can have positive outcomes for access into the site and reduce the required parking rates. It is essential that a light rail corridor is future proofed within the development in terms of easement of tracks/stations and associated services.

The report mentions Travel Demand Management (TDM) strategies which include car share and travel plans. These TDM strategies will be further strengthened by including the future light rail routes and stations in the report.

### **3.7.7 Travel Plans**

A travel plan is needed for the whole precinct. This should include:

- A free bicycle hire scheme just for the development's tenants and home owners. At least 200 bikes and lockers provided on a smart card access system for the residents across the site.
- 20 car share cars should be provided to residents just for the development site on a similar basis to 'Go Get Cars'.
- Promotional Opal cards should be offered to all new residents with \$200 of credit.
- Sydney Buses should be given an initial subsidy from the developer to offer more services until patronage levels increase.

## **3.8 Urban Design**

### **3.8.1 Context**

The following comments are made in relation to the surrounding context:

- The existing context should be indicated in the indicative layout plan.
- The existing context/proposed development on a block by block basis should be integrated in plan and section within the DCP.
- An analysis is needed to illustrate an appropriate transition of scale could occur between the proposed towers and the existing/future built form outside the master plan area. The

appropriate transition of scale must be addressed in the DCP (both in objectives and controls). There are significant strata holdings (both RFBs and townhouse developments) in the immediate context which are unlikely to change in the long term – this must be acknowledged in the master plan and DCP controls.

- Future towers - Should this development go ahead as proposed it is likely to catalyse similar towers on sites in proximity to, but outside the master plan area. Aspects such as inter-building separation of future towers both within and outside the master plan area must be considered. From Council's urban design perspective – towers must ensure appropriate levels of sky when viewed from the public domain. A contiguous presentation of tall towers is an inappropriate outcome. It is unclear how the separation is achieved between towers within the master plan area and those that may be developed in close proximity to the master plan area.
- The Sports and Leisure Precinct requires more resolution and concern is raised about its proposed form ie proposed uses, form and resultant spaces/interface with neighbouring sites.

### **3.8.2 Existing DCP Controls**

The following comments are provided in relation to existing DCP controls and built form:

- The existing provisions of the DCP apply unless specific exception is made otherwise. These exceptions must be clearly highlighted in a summary report.
- Building length must not exceed more than 65m for 3-4 storey podium/street wall and 45m for residential towers.
- Given there is a DCP street frontage control for the City Centre (North), it is recommended that a similar street frontage height no higher than 14m with an upper level setback of 4m is considered at the periphery of the master plan area - especially along O'Connell St and other existing local street interfaces. This is to facilitate a street wall no higher than 3-4 storeys and to create a coherent streetscape.
- The existing DCP has a predominant street wall of 3-4 storeys (max 14m) for most of the City Centre with a upper level setback for taller built form. It is suggested that a similar approach is maintained for consistency as the Parramatta North Urban Renewal Area would be effectively an urban extension.

### **3.8.3 Proposed height, yield and DCP controls**

The following comments are provided in relation to the proposed height, yield and DCP controls:

- An appendix containing the area schedule with the efficiency of building envelope to GFA should be included in the submitted material. Similarly the assumptions for height should be indicated.
- Lift overruns/rooftop services for buildings 55m and above are expected to be integrated with architectural roof features - therefore they should not be included in maximum height allowances. This is to prevent the conversion of the lift over-run allowance into additional floors.
- Street frontage controls should be indicated in street typology as in the DCP – this currently stops at the building line. Again a consistent approach with the City Centre street frontage controls is recommended.

- The floor plate/ Gross Building Area (measured to the external facade of the building, including balconies) of residential towers should be limited to a maximum of:
  - 800sqm for residential buildings up to 75m in height (approx. 25 storeys).
  - 950sqm for residential buildings which are 75-105m in height (approx. 25-35 storeys).
- Street address of residential towers: All residential towers must have direct access from a public street. Block B appears to have a 20 storey tower without a street address. Block F8 does not have street address and is accessed off a private road.

### **3.8.4 Public Domain Plan and Set-out**

A Public Domain Plan must be developed based on the survey. This should accurately set out all elements of the public domain including streets, open spaces and riverside park, as well as easements for light rail, drainage and services. The staging and delivery/responsibility matrix should be indicated. Any variations should be to an equal or better specification.

The existing western end of Albert Street (No Through Road) is significantly higher than Fleet Street. This transition of grade should be detailed with respect to accessibility and appropriate grades.

### **3.8.5 Design Excellence process and DEAP review**

There appears to be some confusion about the difference between Council's 'Design Excellence' process and the 'Design Excellence Advisory Panel' (DEAP) review process – they are quite different. Clause 22B 'Design Excellence' (ie design competition process) for the CBD should be extended to this precinct.

Council does not support the condition that only RFBs 10 storeys and above are to be reviewed by the DEAP. All RFBs and adaptive heritage developments must have a DEAP review, unless they undertake a Design Excellence process (in accordance with clause 22B of City Centre LEP). This is consistent with Council's current controls and practices for the CBD.

### **3.8.6 Identified public benefit**

Height and development yield proposed must be commensurate to identified public benefit – this includes, but is not limited to:

- Restoration of heritage/adaptive re-use of existing heritage.
- Public domain provision/upgrade - A detailed list of public domain deliverables with an area schedule (referenced to a Public Domain Plan) should form part of the proposal.
- Increased affordable housing provision/ contribution – more detail is needed on this aspect. It is strongly suggested a significant provision of key worker housing is accommodated within the precinct given the proximity of the Westmead Health precinct.
- Community facilities/infrastructure – given the proposal for 4,100 dwellings, commensurate provision of social infrastructure such as schools, libraries and community facilities should be indicated. This should be located and quantified and form part of the proposal.
- Public art provision – a public art strategy should be included as part of the proposal.

## 3.9 Planning

### 3.9.1 Technical Planning Review

The following technical planning comments are provided in relation to this proposal:

- It is noted that GFA controls are proposed instead of FSR controls and that this is a reflection of the detailed urban design assessment that has been pursued to formulate the Indicative Layout Plan. This approach is supported on the condition that any GFA controls are included in the LEP.
- There is concern about use of the B4 Mixed Use zone the Sports and Leisure Precinct directly adjacent to the Stadium, as this will set an expectation for residential development, which is considered to be an inappropriate and incompatible land use. An alternate zone should be considered. This should be informed by a more detailed master planning process for the Stadium precinct.
- The Planning Report (at Section 2.4) incorrectly states that Council has identified the area to the north east of the precinct, generally along O'Connell Street, as a potential Urban Activation Precinct. This is not the case and should be corrected.
- It is noted that Section 94A contributions will be payable for the precinct. Further, it is noted that payment of these contributions will be in *addition* to the infrastructure upgrades identified in Table 8 of the Planning Report. This is supported.
- Table 8 of the Planning Report identifies 'Regional Infrastructure Contributions', although it is not clear what these will be. Further clarification is needed.
- Section 4.3.5.10 – Built Heritage of the Draft DCP states all buildings of high heritage significance will be retained, "apart from two". This is inconsistent with Table 4 of the Planning Report which states that *all* buildings of high heritage significance will be retained.
- Development Lots SB, SC and SD in the Draft DCP appear to be missing heights (in storeys) for part of these sites. These should be inserted.
- Clarification is sought on the proposed legislative mechanism to be used to formally amend the *Parramatta DCP 2011*, noting that the proposal includes the insertion of a new Section 4.3.5 - Parramatta North Urban Renewal into Part 4.3 - Special Precincts of the DCP.
- Further analysis is needed to assess the impacts of where the proposed B4 Mixed Use zone penetrates the surrounding context along the eastern boundary, including proposed heights and land use interface (see also Urban Design comments).

The Draft SEPP (which will amend the LEP) and the Draft DCP should be amended to reflect the broad comments provided in this submission. Council requests the opportunity to further review these draft planning controls prior to finalisation.

### 3.9.2 Prioritisation

Council officers have previously raised the issue of the prioritisation of this project over other planning proposals in the Parramatta LGA and also the consolidating LEP with the Department of Planning and Environment and also UrbanGrowth NSW. Council's planning proposals, which are well advanced in the plan making process, will accumulatively help deliver more than 2,000 dwellings and 45,000sqm of employment generating floor space as well as result in only one planning instrument applying to the Parramatta LGA. Council's planning proposals should also be given priority by the Department and it is suggested that any amendment made to give effect to the Parramatta North proposal would be made more seamlessly if all the existing planning proposals are made prior to this occurring.



It is recommended that this proposal help to facilitate Council's other planning proposals in the Parramatta CBD area, which together with the UrbanGrowth NSW proposal will help to facilitate growth of the wider CBD area.

## **3.10 Economic Development**

### **3.10.1 Summary**

The analysis provided is considered to be complete, thorough and is generally supported from an economic development perspective. It provides a good understanding as to the role of the development within the hierarchy of centres and retail.

It is noted that the economic impact assessment has considered the economic contribution of the precinct to the Parramatta and NSW economies. The report notes that the precinct comprises a construction value of approximately \$2.2 billion over the projected 15 to 20 year period of redevelopment. Of the \$2.2 billion construction spend, the modelling estimates that \$1 billion will be generated in industry output for businesses within the Parramatta Local Government Area (LGA). Once occupied, the precinct is estimated to directly generate a total industry output of \$805.3 million per annum in Parramatta.

The proposal provides for broad retail usage information, given the 15 to 20 years development timeframe. In summary, the precinct will generate:

- 4,000sqm of new retail space – new Village Centre (Cumberland Precinct)
- 34,000sqm of mixed use (likely to be predominantly commercial) (Sport & Leisure Precinct)
- 28,000sqm of re-adaptive heritage buildings (Cumberland Precinct)
- Approximately 4,100 dwellings (Cumberland Precinct)

### **3.10.2 Retail demand**

The additional retail space is not likely to impact on the existing retail hierarchy or the retailers in the surrounding neighbourhoods. The following is a calculation of the square metre retail demand for the proposed new dwellings:

- New dwellings = 4,100
- Pop per dwelling = 2.1 pp (2011 average for North Parramatta)
- Total est. population = 8,610 persons
- Est. of retail space per capita = 2.2 sqm
- Total est. demand for retail space = 18,942 sqm

As the precinct is only proposing 4,000 sqm of new retail space, it is anticipated that residual demand growth will support new and proposed retail floor space in existing surrounding centres.

### **3.10.3 Commercial demand**

The study does not address the demand for the additional commercial space other than mention that the health sector jobs currently located in the Cumberland Precinct will relocate.

It is anticipated that the growth of the Parramatta CBD as part of 'A Plan for Growing Sydney' will increase demand for commercial office space over the precinct's 15 to 20 year construction horizon. It is desirable for the precinct to provide more commercial floor space to help facilitate jobs growth in Parramatta.

## **3.11 Environmental Outcomes**

### **3.11.1 Energy and Water Utility Infrastructure**

The scale of the development is expected to place significant pressure on existing energy and water infrastructure. The report prepared by Hyder Consulting in relation to infrastructure and flooding suggests that around \$15 million of works will be required to upgrade existing water, wastewater and electricity services to meet the site's future needs.

Council would strongly encourage the consideration of alternative infrastructure options for this site, including the potential for decentralised energy and water systems, or other alternative forms of supply. Innovative solutions, such as precinct scale energy and water systems, have the potential to reduce costs (both for the developer and ongoing users of the site), increase the value and saleability of buildings, and improve the resilience of the development against future supply issues and/or rising utility costs.

The timing of the Westmead Hospital redevelopment also provides a unique opportunity for UrbanGrowth NSW and Health Infrastructure to work together in order to deliver better outcomes for both precincts. The co-location, scale and nature of planned works provide a substantial opportunity for alternative utility servicing options to be considered jointly, to deliver a more cost effective and sustainable solution to both developments.

Additionally, the Rosehill Recycled Water Scheme (located at the edge of the Parramatta CBD) offers a specific opportunity to potentially address water supply needs for the precinct. The scheme has existing capacity to supply recycled water to future development in and around Parramatta, providing an alternative option to meet the non-potable water needs of the development. An extension of the scheme from Rosehill via the Parramatta CBD into Parramatta North and Westmead has the potential to reduce demands on, and costs of supplying potable water to non-essential services (e.g. cooling towers, toilet flushing).

Avoided infrastructure costs associated with the need to augment existing centralised utility infrastructure and from reduced plant in individual buildings, could be reinvested into alternative options, with the potential to provide substantially increased benefits to the development over the short, medium and long term.

Council would be pleased to assist UrbanGrowth NSW with further advice in relation to these matters.

### **3.11.2 Water Sensitive Urban Design (WSUD)**

Council's Community Strategic Plan, *Parramatta 2038*, has identified a long term goal of bringing back swimming to the Parramatta River. The vision to bring back swimming has the potential to encompass many other aspirations for the Parramatta River, as it will require water quality (at least in designated sections of the River) to meet primary contact recreation standards for most of the year. This will also result in improved water quality for other forms of recreation and for aquatic flora and fauna.

The Parramatta North Precinct has the ability to significantly influence water quality within the River through well planned infrastructure that reduces pollutant loads. As a result, residents, workers and visitors to the precinct will reap substantial benefits, with quality views and access to a clean river for recreational purposes.

Adopting an integrated water management approach that considers all aspects of the water cycle including water supply/demand, stormwater management and wastewater treatment can provide significant environmental, economic and social benefits. These include:

- Potentially reduced upfront and ongoing costs associated with the development
- Greater diversity of supply (due to less reliance on potable water for non-essential uses)
- Improved waterway health outcomes through greater pollutant removal
- Improved urban amenity by utilising water within the public domain
- Reduced risk of localised flooding

Council would consider this approach preferable for a development of this size in order to deliver efficiency outcomes and minimise the impact of the site on local waterways and infrastructure.

### **3.12 Flooding**

The following comments are provided following a review of the Infrastructure and Flooding Study prepared by Hyder Consulting.

#### **3.12.1 Existing Flooding Affection**

- The Parramatta North Urban Renewal precinct is in parts affected by mainstream, major and localised flooding.
- This area is covered under the Upper Parramatta River Flood Study, Draft 8 model and the Upper Parramatta River Catchment Floodplain Risk Management Study by Bewsher Consulting, dated 2003.

#### **3.12.2 Stormwater Management and Localised Flooding**

- It is agreed that Council's current requirements in relation to On-Site Stormwater Detention and Water Sensitive Urban Design (WSUD) be maintained for this precinct area. On-Site Stormwater Detention and WSUD to control increased runoff and water quality from new developments should not be permitted on public open spaces.
- New roads and new public spaces may trigger opportunities to improve water quality by use of WSUD treatment measures. This should be investigated as part of any detailed design.
- A requirement should be set in the DCP that the existing Council stormwater drainage system be upgraded or extended to increase the capacity to capture all flows generated in a 1 in 20 year design ARI storm event. In addition to this requirement provisions are to be made to enable safe overland flow paths for a 1 in 100 year design ARI storm event.
- It is agreed that further detailed local overland flow analysis investigation will be required to quantify overland flows and to design safe overland flow paths prior to rezoning of the precinct area.

#### **3.12.3 Mainstream (Regional) and Major Flooding**

- Additional flood protection should be offered to existing developments such as the Cumberland Hospital and other sensitive sites.
- Any proposed rezoning should appropriately consider flood impact with respect to Land Use Categories as outlined in Council's Local Floodplain Risk Management Policy.
- Open space should be strategically placed to allow for potential dual use as safe access for overland flows.

### 3.12.4 Planning Considerations

- Development should strongly adhere to Council's LEP, the Section 117 Direction 4.3 – Flood Prone Land and also with the State Government's Flood Policy and recommendations outlined in the NSW Floodplain Development Manual, dated April 2005.
- Consideration of a property's impact to flooding should be included in any proposed up-zoning for development.
- Flood maps of the CBD area showing flood inundation extents for the 1 in 20 year, 1 in 100 year and PMF together with the 1 in 100 year hydraulic flood hazard map should also be included for consideration when identifying potential properties for redevelopment as part of any strategic planning process.
- It is recommended that a Local Strategic Floodplain Risk Management Plan be prepared that responds to both planning and floodplain risk management needs. The plan can investigate the potential for improved flood mitigation options and improvements to overland flow paths.
- With increased development densification, particularly in those larger developments requiring direct connection to council's underground stormwater drainage system it may also be necessary to appropriately upgrade the existing stormwater drainage street pipe drainage network. Improved stormwater drainage inlet capacity to control surface runoff should also be required. The determination of additional improvements to the drainage network should be included as part of the hydraulic model analysis for events up to and including the 1 in 20 year ARI storm.
- A detailed Flood Study Report, Floodplain Risk Management Plan and Flood Emergency Response Plan need to be prepared.
- Sydney Water should be formally requested to provide comments with regards to any proposals that are considered adjacent to Sydney Water infrastructure.
- Details of Precinct Catchment focussed design measures will be required to be prepared during detailed design stage of this project to Council's satisfaction.
- The investigation of major innovative flood mitigation works such as a major flood detention basin upstream of Parramatta CBD to reduce the impact of mainstream flooding within the CBD area should be explored. An example of this would be Council's existing McCoy Park Detention system located near the boundary of Blacktown LGA. These flood mitigation works would need to be very large long term visionary works. Funding would likely cost many tens of millions of dollars and should only be recommended if significant flood reduction can be demonstrated.

### 3.12.5 Proposed Flood Modelling Consideration

- Detailed hydraulic flood modelling should be undertaken to determine the extent and depth of flooding in this area. The hydraulic modelling shall include identification of the high hydraulic flow areas and all key overland flow areas. This modelling shall be undertaken using two dimensional modelling such as TUFLOW and include a detailed comparison between pre and post development scenarios.
- Modelling work is to determine and provide flooding impact to flood emergency evacuation routes over the full flood duration up to the peak maximum flood, PMF. This information can be used to create appropriate and detailed flood response plans.
- Modelling scenarios are to include impacts to planning and development as a result of future climate change.

### 3.12.6 Development and Building Considerations for Better Flood Resilient Properties

- Flood considerations to building design are not just merely related to fixing the habitable floor level above the 1 in 100 year flood level with a 500 mm freeboard and to allow for loss of flood storage in design of the ground floor. Developments should also comply with the flood related planning and development controls outlined in Council's Local Floodplain Risk Management Policy and DCP requirements.
- The building footprints should be designed to minimise their impact on flooding and to minimise flood risk. Overland flow corridors should not be obstructed by buildings.
- All critical building service such as air-conditioning units, lifts, mechanical ventilation units, electrical and communications systems should be located above flooding levels.
- It is also recommended that the key overland flow corridors should have adequate design considerations applied. Detailed cross sections should be derived based on specific overland flow path needs that address issues such as:
  - Minimum unobstructed overland flow width required;
  - Street and property frontage activation requirement details;
  - Recommended design layouts to achieve minimum finished habitable floor levels.
- Building developments within the floodplain would rely on seeking refuge on site in major flood events. Evacuation may not provide a desirable response in all cases. During the building design process the most appropriate flood emergency response scenarios would need to be investigated and the building designed accordingly with appropriate evacuation provisions to high floor levels and adequate assembly areas provided.
- It is strongly recommended that all habitable floor levels for all developments (residential and commercial) be designed for the 1 in 100 year flood plus 500 mm freeboard.

Appropriately addressing flooding in the planning and implementation of any urban renewal strategy will dramatically reduce flood risk and economic losses suffered in a flood event and will allow for quicker flood recovery by the community.

### 3.13 Contamination

Council is required by *SEPP 55 – Remediation of Land* and the Parramatta City Council *Contaminated Land Policy* to consider contamination issues when rezoning land and before the development of land. Based on the information provided in the preliminary environmental site assessment undertaken by JBS&G for the North Parramatta Lands Cumberland Precinct, Council understands there is potential land contamination in the precinct as a legacy of past land uses. However, the contamination is limited in area and unlikely to prevent future development of the site.

As the proposed rezoning covers a large area and the extent of contamination is not known, it is Council's position that a stage 2 detailed site investigation must be undertaken prior to any redevelopment of the site to characterise and quantify the extent of contamination. Mechanisms should be included in the LEP and/or DCP to ensure further investigation and remediation occurs before development of the land (or permissible uses are located according to land suitability).

The stage 2 detailed site investigation must be undertaken in accordance with the National Environment Protection (Assessment of Site Contamination) Measure (Amendment 2013) and relevant NSW EPA Guidelines proportionate to the nature of the land use activity.

If the stage 2 detailed site investigation indicates that the site poses unacceptable risks to human health or the environment within the footprint of the precinct and off site, then a remedial action

plan must be prepared in accordance with SEPP 55—Remediation of Land. The remedial action plan must justify the category of remediation in accordance clause 9 of SEPP 55—Remediation of Land.

Referral to the NSW EPA is necessary to determine if any associated licence, consent or permit is required under relevant legislation to regulate the potential contamination on site.

## Part 4 – Concluding Comments

The proposal for the Parramatta North Urban Renewal precinct will generate significant benefits for the Parramatta area, including the following:

- Significant heritage restoration in a revitalised heritage precinct.
- Significant improvements to the public domain, including improved access to the river front and new public open spaces.
- Expansion of the Parramatta CBD to the north, consistent with Council's *Draft Parramatta City Centre Planning Framework Review*.
- Significant economic benefits in terms of industry output, including during construction and ongoing output.
- Significant opportunities for tourism.

This submission has identified a number of outstanding matters that require further analysis, commitment to infrastructure and design resolution. Council is keen to work with representatives from UrbanGrowth NSW and the Department of Environment and Planning to resolve these matters and work towards the goal of achieving a high quality, connected, vibrant and activated precinct.



Figure 6 – Artist's Impression: The enhanced Female Factory public domain