

SJB Planning



Parramatta North Urban
Transformation
Draft State Environmental Planning Policy
(PNUT) 2014

Response to
Submissions

9 June 2015

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Executive Summary

This report addresses matters raised during the public exhibition of the study for the Parramatta North Urban Transformation (PNUT) area.

It details the revisions made in response to matters raised by agencies and the community and the changes made to the proposed Indicative Layout Plan (ILP). These were to:

- Remove proposed building F7-1 and reduce building F7-2 from 6 storeys to 4 storeys reducing the amount of potential development and building heights near the Female Factory Precinct F6 (this building is now marked as F7-1 on the plan).
- The Norma Parker Centre/Kamballa (was Precinct F8) has been divided into two Precincts (F8 and F9). Proposed buildings F8-2 and F8-5 have been deleted and building F8-3 in the vicinity of the Grey Headed Flying Fox (GHFF) camp has also been deleted.
- Partial reallocation of some of the floor space removed from Precincts E3, F1, F2, F3, F5, F7, F8, H2, and H3 and partially redistributed to Precincts A1, G1, G2 and H5 (the eastern edge of the PNUT area);
- The revisions have reduced the overall gross floor area (GFA) by 13,366m². The total GFA proposed is now 420,088m² reduced from 433,454m².
- Remove the part 6 and part 16 storey building from Precinct E3 and convert the now vacant area to open space (O/S5);
- Reduce the southerly extent of Precinct SD along O'Connell Street;
- Prohibit residential uses in Precincts SA, SB, SC and SD along O'Connell Street;
- Allocate Precincts O/S3 and O/S4 as RE1 Public Recreation and dedicate these areas to Parramatta City Council;
- Generally reduce the heights and number of buildings in the most sensitive heritage precincts and retain taller elements on the periphery of the eastern of the PNUT area;
- Revise LEP maps (floor space ratio (FSR) and Height of Buildings) maps to reflect the removal and reduction of buildings in Precincts E3, F2, F5, F7, F8 and F9 and the reconfiguration of Precincts A1, H2-H5 and G1;
- Replace the initially proposed Gross Building Area development standard with a FSR development standard and associated map to be included in the Parramatta Local Environmental Plan (LEP) 2011; and
- Amend the draft Development Control Plan (DCP) to reflect revisions to each precinct.

The amended study and Indicative Layout Plan (ILP) represent a substantive and reasoned response to matters raised in the submissions.

The proposed planning framework will facilitate future development leading to the renewal of the PNUT and the adaptive re-use of significant heritage buildings and places. The proposed planning framework will lead to the establishment of an active precinct that facilitates public access into and

through an area that is currently largely unavailable and inaccessible to the public. Redevelopment consistent with the ILP will deliver improved infrastructure for the locality and provide recreation and park areas for use by the wider community. The proposed built form envelopes are of appropriate height, bulk and scale and will deliver beneficial outcomes for the site and the broader community.

It is recommended to proceed to approve the draft State Environmental Planning Policy (PNUT) (the SEPP) to facilitate renewal of this important area.

1.0 Proposed Revisions

The ILP and associated draft LEP maps have been amended following the exhibition. The issues raised by State Agencies are addressed at Section 2.15 and public submissions are addressed at Attachment 1.

1.1 Description of Proposed Amendments

The exhibited study sought revisions to the planning framework that applies to the PNUT area. These revisions would facilitate lodgement of future development applications to allow the following anticipated yields.

Cumberland Precinct

- Around 3,900 dwellings
- Around 28,000m² of gross floor area (GFA) of adaptive re-use of retained heritage buildings
- Up to 4,000m² of GFA of retail space.

Sports and Leisure Precinct

- Around 34,000m² GFA of mixed use (predominantly commercial).

The project team considered the matters raised in the submissions and investigated options to revise the study. The design of the development has been significantly modified in response to the matters raised which has resulted in a decrease of GFA, equating to 13,366m² of reduced GFA. The exhibited study showed a GFA of 433,454m² and the response to submissions and accompanying ILP shows a GFA of 420,088m².

The proposed amendments, precinct by precinct are detailed below.

Precinct	Proposed Revisions
A1	<ul style="list-style-type: none"> • Proposed 30 storey building footprint revised to be a part 30 and part 12 storey building • The proposed 4 storey wing (A1-1) has been removed • Former 4 storey building (A1-4) has been increased to 8 storeys centrally in the block and combined with building A1-3
A2	<ul style="list-style-type: none"> • No changes
A3	<ul style="list-style-type: none"> • No changes
B	<ul style="list-style-type: none"> • The northern 12 storey building footprint (B-6) relocated to provide a

Precinct	Proposed Revisions
	<ul style="list-style-type: none"> minimum 6.0m setback to the existing sandstone wall No changes to building envelope heights proposed Minimum setbacks of 6.0m to the eastern and western boundaries of the precinct nominated
E3	<ul style="list-style-type: none"> The part 6, part 16 storey building removed and the space converted to open space equating to 1,595m² of open space 6 storey building increased to 8 storeys (building E3-1)
F1	<ul style="list-style-type: none"> No changes
F2	<ul style="list-style-type: none"> 4 x 3 storey building wings each reduced to 2 storeys
F3	<ul style="list-style-type: none"> The part 2 storey, part 4 storey and part 6 storey podium reduced to a part 1 storey and part 3 storey podium. Partial demolition of the extension to the heritage building (Building No.65 which is identified as having minor significance). The eastern extent of the podium has been reduced to facilitate the retention of existing trees within O/S 3
F4	<ul style="list-style-type: none"> No changes
F5	<ul style="list-style-type: none"> 12 storey building reduced to 6 storeys (F5-1) and the footprint amalgamated to create a 4 storey perimeter building form (F5-2)
F6	<ul style="list-style-type: none"> No changes
F7	<ul style="list-style-type: none"> Building footprint reduced by the deletion of proposed 4 storey wing (F7-1) Building F7-2 renamed to be F7-1 and reduced from 6 storeys to 4 storeys Potential future new building envelope to be infill development to support appropriate new uses within the significant buildings of the former Female Factory and Parramatta Lunatic Asylum complex
F8	<ul style="list-style-type: none"> Precinct divided into two precincts (F8 and F9) Building F8-3 removed, with no other built form changes are proposed
F9 (new precinct)	<ul style="list-style-type: none"> Former buildings F8-2 and F8-5 removed Building F8-1 becomes F9-1 and building F8-4 becomes F9-2 with no building envelope or height changes The footprint of building F9-1 has been increased and the footprint of building F9-2 has been reduced
G1	<ul style="list-style-type: none"> 24 storey building height unchanged with the southerly extent slightly increased Building footprints reconfigured to create two courtyard configurations

Precinct	Proposed Revisions
	<ul style="list-style-type: none"> Proposed 6 storey building fronting O'Connell Street increased to 10 storeys 10 storey building increased to 14 storeys 4 storey building increased to 6 storeys and building form broken to provide U-shape building footprint The building form along New Street broken to provide a western view corridor to building No.83
G2	<ul style="list-style-type: none"> G2-1 height remains unchanged. Building footprint modified and slightly increased to create a courtyard configuration Building G2-2 increased from 14 to 16 storeys Amended building footprint results in no change to the open space area of O/S_4.
H1	<ul style="list-style-type: none"> No changes
H2	<ul style="list-style-type: none"> The full perimeter building form for precincts H2-H5 has been replaced with building separation to the street network to mitigate the dominance of the built form H2 now proposes an 8 storey building (H2-1) and a 6 storey building (H2-2), instead of the single 8 storey building
H3	<ul style="list-style-type: none"> The proposed 8 storey H3-1 building split into two portions, H3-1 a 20 storey building and H3-2 fronting O'Connell Street, is a 6 storey portion Building H3-2 renamed as H3-3 and reduced in height from 30 storeys to 6 storeys Proposed 6 storey building of H3-3 and the 18 storey building of H3-4 have been reconfigured and broken into 4 buildings (H3-4, H3-5, H3-6 and H3-7). Building H3-4 at 6 storeys, H3-5 reduced to a 4 storey building, H3-6 located within the site and increased to 30 storeys, H3-7 reduced from 8 storeys to 6 storeys.
H4	<ul style="list-style-type: none"> The 6 storey building H4-1 remains at 6 storeys The 20 storey H4-2 has been reduced to 18 storeys Building H4-3 was a 6 storey building and is now a part 4 and part 8 storey building with the taller element set into the site
H5	<ul style="list-style-type: none"> Buildings H5-1 and H5-2 have had a redesigned footprint, however the proposed heights remain unchanged A new 24 storey building H5-3 has been provided centrally within the block bound by O'Connell, Albert, Fleet and Fennel Streets Proposed H5-4 has been reduced from 8 storeys to 4 fronting O'Connell Street Building H5-5 has been reduced from an 8 storey attached perimeter building to a standalone 6 storey building

Precinct	Proposed Revisions
SA	<ul style="list-style-type: none"> No built form changes Residential prohibited
SB	<ul style="list-style-type: none"> No built form changes Residential prohibited
SC	<ul style="list-style-type: none"> No built form changes Residential prohibited
SD	<ul style="list-style-type: none"> No built form changes Residential prohibited Southern projection of the rezoning boundary reduced
O/S1	<ul style="list-style-type: none"> To be rezoned from current B4 Mixed Use to RE1 Public Recreation and ultimately be dedicated to Parramatta City Council
O/S2	<ul style="list-style-type: none"> To be rezoned from current B4 Mixed Use to RE1 Public Recreation and ultimately be dedicated to Parramatta City Council
O/S3	<ul style="list-style-type: none"> To be rezoned from current B4 Mixed Use to RE1 Public Recreation and ultimately to be dedicated to Parramatta City Council
O/S4	<ul style="list-style-type: none"> The area to be zoned from current B4 Mixed Use to RE1 Public Recreation and ultimately to be dedicated to Parramatta City Council.
O/S5	<ul style="list-style-type: none"> New Open space area O/S5 provided of 1,595m² to provide additional open space to be dedicated to Parramatta City Council.

The amended ILP Revision 15f is provided in Figure 1.

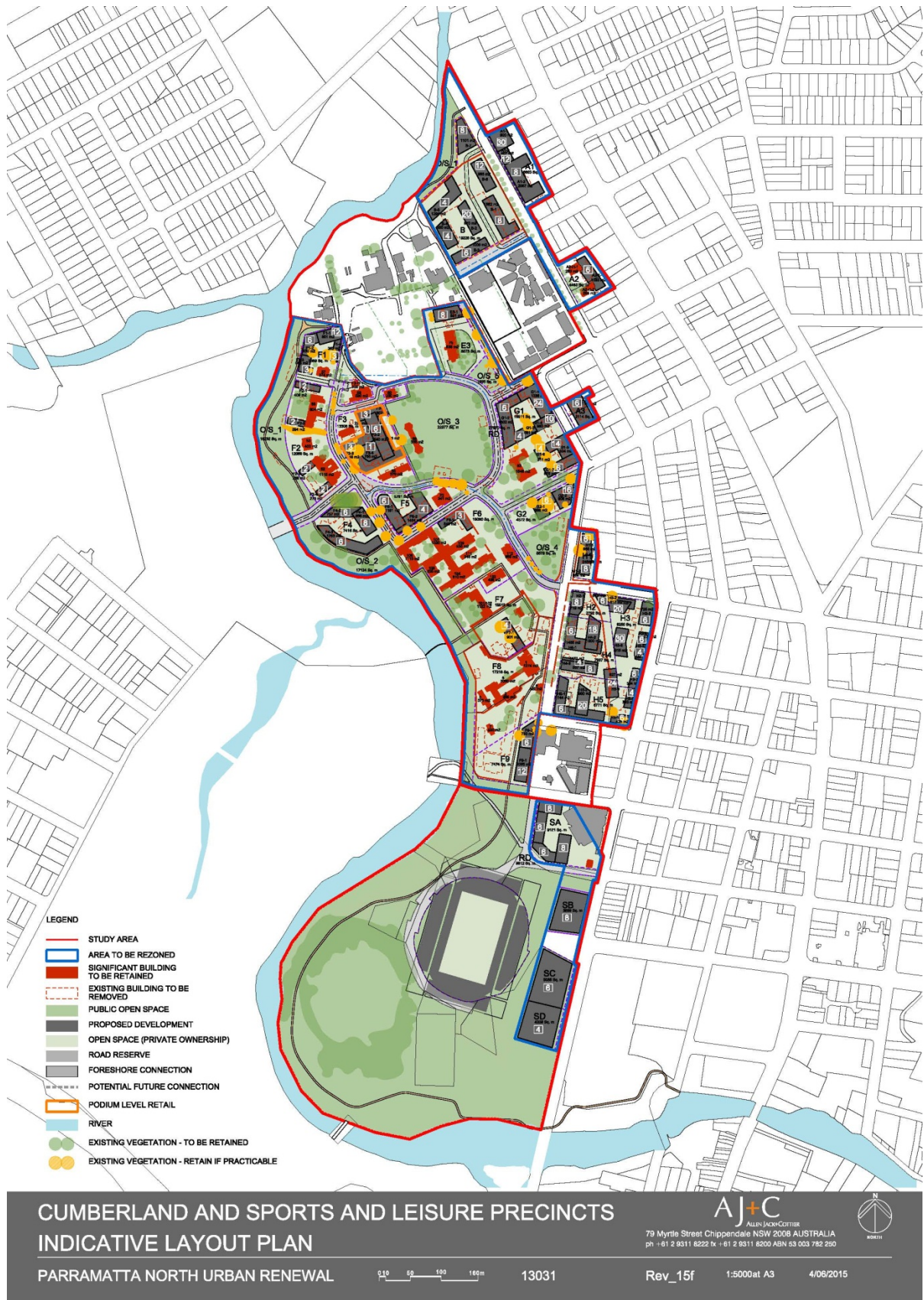


Figure 1: Revised ILP for Parramatta North Urban Transformation area

Consequential amendments to the draft Land Zoning map and Height of Buildings map have been made and reflected the ILP revision. These amended draft LEP plans are included at Attachment 2.

The prohibition of residential development in Precincts SA, SB, SC and SD will be facilitated by the addition of a local provision into Part 6 of the Parramatta LEP 2011 that states that despite any other provision of the plan, being the Parramatta LEP 2011, 'residential accommodation' is prohibited in the Sports and Leisure Precinct. Parramatta City Council has indicated support for this approach in meetings through the exhibition phase of the application. The prohibition of residential uses as proposed is a positive response to the concerns raised by Council.

Precincts F6, F7 and F8 are already zoned B4 Mixed Use. The proposed amendments to the planning framework will not alter the range of land uses currently permitted with development consent.

It is also proposed that the SEPP expressly exclude bonuses in height and FSR via the design excellence competition process. These bonus provisions do not currently operate on any of the land in the area covered by Parramatta LEP 2011, but could inadvertently apply under the proposed consolidation of the Parramatta City Centre LEP 2007 and Parramatta LEP 2011.

The draft DCP controls have been revised to reflect the amendments to the ILP and the requirement for applications to pursue the Parramatta Design Excellence Advisory Panel process. The requirement for the referral of applications to the Parramatta Design Excellence Advisory Panel has been strengthened to require that proposed buildings of 5 or more storeys are required to be scrutinised through the review process instead of the originally proposed 10 or more storeys.

1.2 Heritage Assessment of the ILP revisions

TKD Architects assessed the revisions made to the ILP in response to the consultation process from a heritage impact perspective. The assessment is included at Attachment 5.

The revisions are considered an improvement on the PNUT area as a whole and will minimise impacts on the heritage significance of the historic sites, including views to and from significant buildings.

Each precinct identified for amendment in the ILP is summarised below.

1.2.1 Precinct A1

The maximum height of 30 storeys is retained with the 4 storey wing increased to 12 storeys. The rear 4 storey wing A1-1 has been deleted. Building A1-3 is now a single 8 storey building with rear courtyard configuration. These increases are a direct result of the reduction of new development within the curtilages of the significant buildings adjacent to Parramatta River.

It is noted that the lots comprising this precinct are included within the Parramatta Gaol State Heritage Register listing which is believed to be a drafting anomaly that is proposed to be corrected by application to the Heritage Council of NSW. An application is intended to be submitted to the Heritage Council of NSW separately to resolve this matter.

The increase in height of the buildings within this Precinct will not negatively impact the significant views of Parramatta Gaol or its curtilage, provided the draft DCP design guidelines relating to

footprint location, floor plate size and building separation are implemented. It is also noted that this area interfaces with land zoned B6 Enterprise Corridor.

1.2.2 Precinct A2

The proposed building envelopes in this precinct remain unchanged.

It is noted that the lots comprising this precinct are included within the Parramatta Gaol State Heritage Register listing which is believed to be a drafting anomaly that is proposed to be corrected by separate application to the Heritage Council of NSW.

The detailed design of the development of this Precinct will need to avoid a negative heritage impact on the Governors' Residences. The schedule of actions at Attachment 3 commits to Heritage Management Plans being prepared to address this requirement. In addition, a Conservation Management Plan for the PNUT area will be required before any development application is determined.

The development of this Precinct will avoid any negative heritage impact on significant views of Parramatta Gaol or its curtilage, provided the design principles set out in the ILP, draft DCP and Heritage Management Plans are followed, particularly relating to height, setbacks and detailed provisions that will be included in the heritage management plans. This area is also adjacent to land zoned B6 Enterprise Corridor.

1.2.3 Precinct B

The proposed heights of the building envelopes do not change. The building footprints have been adjusted to provide a minimum setback of 6.0m to the retained sandstone walls, and to facilitate future Statement Environmental Planning Policy 65 – Design Quality of Residential Flat Development (SEPP 65) consistent building separations.

The revisions will not have a negative heritage impact on significant views or the curtilage of the sandstone walls of the former Parramatta Gaol farm compound, as long as the design principles such as building footprints, building floor plates and sensitive design treatments set out in the ILP, draft DCP and Heritage Management Plans are followed and enforced through the development assessment process.

1.2.4 Precinct E3

The proposed part 6 part 16 storey building envelope has been removed. The location of this building is now proposed as open space and identified as OS/5. The 6 storey building envelope to the north of the recreation hall (building E3-1) has been increased to 8 storeys. The deletion of the 16 storey building provides an increased curtilage for the retained heritage building. The deletion now provides for unobstructed views from open space area O/S3 and O/S 5 to the heritage significant sandstone wall being retained. The southern portion of the precinct is now proposed to be public open space of 1,595m² in area and has been designated as RE1 Public Recreation in the revised LEP map.

1.2.5 Precinct F2

The 3 storey projecting wings have been reduced to 2 storeys, providing a more recessive element adjacent to the retained heritage buildings and reducing the visual dominance of the new building envelopes when viewed from the Parramatta River.

1.2.6 Precinct F3

The part 2 storey, part 4 storey and part 6 storey podium has been reduced to a part 1 storey part 3 storey podium. The eastern extent of the podium has been reduced to facilitate the retention of existing trees within O/S 3. The western extent of the podium is extended to provide an active retail frontage opportunity to the new street. Demolition of a later minor significance addition to the Central Male Block Building heritage building (CH65) is proposed.

1.2.7 Precinct F5

The proposed new building F5-1 has reduced from 12 to 6 storeys and the building footprint increased in specific response to the NSW Heritage Council's concerns over the visual impact of a 12 storey building in this location. Implementing the design principles set out in the ILP, draft DCP and Heritage Management Plans through the development assessment process relating to matters such as setbacks, build-to lines and vegetation retention will avoid adverse heritage impacts.

1.2.8 Precinct F6

The proposed new 3 storey building is intended as infill development to support appropriate new mixed uses within the former Female Factory and Parramatta Lunatic Asylum complex. The design of any new building will be guided by the design principles set out in the ILP, draft DCP and Heritage Management Plans that have been undertaken to be prepared. No changes have been made to the proposed new building envelope.

1.2.9 Precinct F7

The amended ILP deletes proposed new building F7-1 and reduces the size of the remaining building envelope (formerly identified as F7-2 now renamed to be F7-1) from the proposed 6 storey enveloped to a 4 storey building.

The proposed 4 storey new building envelope is intended as infill development to accommodate space and facilities that would support appropriate new uses within the former Female Factory and Parramatta Lunatic Asylum complex.

The design of any new building will be guided by the design principles set out in the ILP, draft DCP and Heritage Management Plans that have been undertaken to be prepared. The implementation of these plans and controls, in particular relating to setbacks, building footprints and building treatments will maintain the Precinct's heritage significance.

1.2.10 Precinct F8

Precinct F8 will no longer include any new building envelopes with the deletion of proposed the proposed 4 storey building F8-3. The southern portion of the Precinct has been separated to create a new Precinct F9.

1.2.11 Precinct F9

Precinct F9 was created by dividing the original Precinct F8 into two precincts.

The revised design deletes the 4 and 6 storey building previously identified as buildings F8-2 and F8-5. The 6 and 12 storey envelopes of buildings that were identified as F8-1 and F8-4 remain unchanged. These buildings have been renamed as F9-1 and F9-2.

The removal of buildings from the south western corner of the site provides a positive heritage outcome and unobstructed sightlines to the heritage buildings in precinct F-8 as viewed from the south.

The development of this Precinct will avoid a negative heritage impact on significant views of the Norma Parker/Kamballa Precinct or its curtilage provided that the draft DCP design guidelines relating to setbacks and building alignments are followed.

1.2.12 Precinct G1

The extent of the frontage presented to O'Connell Street has been reduced by breaking the proposed building envelopes into two (2) courtyard blocks. The 6 storey building south of the 24 storey tower has been increased to 10 storeys. The rear 6 and 8 storey wings are now configured as 6 and 4 storey wings, reducing the building height adjacent to the retained heritage building. The southern-most proposed 10 storey building has been increased to 14 storeys stepping down to 6 storeys at the southern most extent of the precinct.

The new building envelope is a direct result of reduced development within the curtilages of the most significant buildings adjacent to the Parramatta River.

The minor increases in height of two buildings within this Precinct remains consistent with the design principles and guidelines set out in the ILP and draft DCP to avoid a negative heritage impact on significant views and the curtilage of the Nurses Home No. 2. The revised ILP configuration for Precinct G2 and the implementation of the proposed building setbacks, building alignments and vegetation retention through the development assessment process will ensure these heritage values are protected.

1.3 Proposed Floor Space Ratio

A FSR development standard map replaces the originally proposed Gross Building Area map for each precinct. The proposed FSR map is included at Attachment 2. Table 1 compares the effective FSR proposed in the exhibited study and the revised ILP.

The proposed GFA from November 2014 was 433,454m². The revised calculation of GFA as a result of the revisions made to the ILP is 420,086m², a reduction of 13,369m².

Overall the proposed building height and GFA changes are not considered to have a significant impact to the future development given that there has been an overall reduction in the potential GFA able to be achieved on the site.

The proposed FSR and the resulting building envelopes have been considered relative to potential impacts upon heritage buildings, places and views and the amenity impacts to surrounding areas.

The location of the larger building has been carefully considered having regards to the heritage significance of the locality and surrounding areas. The ILP and amended zoning and development standards will introduce larger buildings than currently exist. These buildings have been limited to the locations which can satisfactorily accommodate these larger forms. As has been demonstrated through the response to submissions process, the plans have been revised to respond to concerns raised over the height and scale of buildings. In this regard, multiple changes have occurred across the site such as F2, reducing the new building heights from 3 to 2 storeys, in precinct E3 the proposed 16 storey building has been deleted and the proposed 12 storey building in Precinct F5 reduced to 6 storeys. In F7, the building F7-1 has been removed and buildings in Precincts F8 and F9 have been removed due to concerns over potential impacts on the GHFF camp.

The proposed built forms will lead to the transformation of the area in terms of the scale of buildings which exist. This transformation is however proposed in a well-planned manner which provides for appropriate landscaped settings for the buildings, open space to support the potential future occupants and a high quality urban environment. The provision of taller buildings, particularly to the periphery of the PNUT area must also consider the site's proximity to the Parramatta CBD and the on-going evolution of this area.

The assessment has concluded that the proposed building envelopes and heights are appropriate in the context of the locality and the demonstrated ability for the heritage significance of the area to be protected and incorporated into the renewal of the area.

Site Identifier	Site Area	GFA Proposed Nov 2014	Equivalent FSR Nov 2014	GFA Proposed June 2015	FSR Proposed June 2015	FSR Category Applied
A1	6,603	31,080	4.71	36,315	5.5	AA1 (6:1)
A2	4,480	5,037	1.12	5,036	1.12	P (1.2:1)
A3	2,114	5,337	2.52	5,337	2.52	V1 (3:1)
B	19,226	49,142	2.56	49,076	2.55	V1 (3:1)
E3	8,073	17,323	2.15	6,121	0.76	J (0.8:1)
F1	5,389	13,371	2.48	12,371	2.3	V1 (3:1)
F2	12,069	5,116	0.42	4,184	0.35	B (0.4:1)
F3	13,308	17,663	1.31	15,824	1.18	P (1.2:1)
F4	7,416	16,489	2.22	16,488	2.22	V1 (3:1)
F5	5,761	12,617	2.19	10,093	1.75	T1 (2:1)
F6	19,080	7,522	0.39	7,522	0.39	B (0.4:1)
F7	15,513	6,600	0.43	3,825	0.25	A (0.33:1)
F8	17,216	27,577	1.6	5,258	0.31	S2 (1.7:1)
F9	7,474			13,379	1.79	V1 (3:1)
G1	16,511	51,580	3.12	54,430	3.3	V2 (3.3:1)
G2	4,573	11,753	2.57	14,868	3.25	V2(3.3:1)

Site Identifier	Site Area	GFA Proposed Nov 2014	Equivalent FSR Nov 2014	GFA Proposed June 2015	FSR Proposed June 2015	FSR Category Applied
H1	2,484	6,561	2.64	6,561	2.64	V1 (3:1)
H2	2,792	8,736	3.13	6,398	2.29	V2 (3.5:1)
H3	8,250	43,280	5.25	38,567	4.67	AA1 (6:1)
H4	7,937	24,978	3.15	31,200	3.93	X (4:1)
H5	8,771	29,894	3.41	35,438	4.04	AA1(6:1)
SA	9,121	15,903	1.74	15,903	1.74	S3 (1.75:1)
SB	3,899	9,218	2.36	9,217	2.36	V1 (3:1)
SC	5,085	9,660	1.9	9,660	1.90	T1 (2:1)
SD	4,336	7,016	1.62	7,017	1.62	S2 (1.7:1)
Totals:	218,405	433,454	1.98	420,088	1.92:1	

Table 1: Comparative FSR calculation table for Parramatta North Urban Transformation area

The proposed FSR map for the PNUT area is provided at Attachment 2.

1.4 Revised building envelopes

The amended ILP responds positively to heritage concerns relating to the height and provision of buildings in Precincts E3, F2, F5, F7 and F9 near heritage items. The height of buildings in Precincts A1, H4, H5, G1 and G2 have been revised to facilitate the redistribution of the floor space originally proposed in Precincts E3, F2, F3, F5, F7, F9, H2 and H3.

Precincts H2 to H5 have been reconfigured to relocate the proposed taller towers centrally within these precincts. This has been undertaken in conjunction with providing reduced building envelopes to O'Connell Street to respond to the residential development and conservation area to the east. The strong perimeter building form has been broken down into smaller envelopes and the 30 and 18 storey forms at the street edge relocated to within the centre of the site.

The building envelope for precinct G2 has been reconfigured as a courtyard building typology, with the footprint increasing from 1,485m² to 1,794m². Building heights of 6 and 14 storeys have been increased to 6 and 16 storeys. The area of open space to the south, O/S4 has been retained and is supplemented by the additional public open space now proposed in O/S5 by the footprint modification to the buildings.

The relocated building envelopes have been assessed with consideration to sunlight access and impacts on adjoining development, and the potential impact on the PNUT area's views and vistas. The assessment concludes that the proposed building envelopes are capable of avoiding adverse impacts on the area's heritage significance and to retain appropriate residential amenity in the areas surrounding the PNUT area. The precincts with the tallest proposed buildings are also located on the periphery of the PNUT area and will form the catalyst for revitalising the area east of the heritage precinct.

The individual design elements of the relevant buildings on Precincts A1, G1 and G2 will be assessed in the future development assessment phase. The solar access analysis of the proposed building envelopes at Attachment 7 demonstrate that the urban areas to the east of the PNUT area will be able to retain three hours of solar access and the shadows cast within the development area are reasonable and able to achieve SEPP 65 solar access requirements.

The proposed building bulk and heights have been demonstrated to balance the development yield potential with the avoidance of adverse impacts on the heritage significance of the area and amenity impacts to surrounding residential areas.

Overall the proposed building height and envelope revisions are not considered to have a significant impact to the existing and future development, and have not increased the overall maximum building heights originally proposed.

2.0 Key Assessment Issues

This section addresses key assessment issues identified in the submissions received by the Department of Planning and Environment.

2.1 Issue - Heritage Impacts

Concerns were raised relating to the height and proximity of development to significant buildings landscapes and vistas.

Response:

The ILP at Precincts F2, F5, F7, F8, F9 and E3 has been revised in response to heritage concerns, particularly the reduced height of the proposed 12 storey to a 6 storey building in Precinct F5, the deletion of the part 6 and part 16 storey building within Precinct E3, the deletion of buildings within Precincts F7, F8 and F9.

The proposed new building in Precinct F5 has been reduced from 12 to 6 storeys and the footprint revised.

Precinct F8 has been divided into Precincts F8 and F9. Precinct F9 will accommodate new buildings only. There will be no new buildings within Precinct F8. The deletion of buildings F8-2 and F8-4 increases the separation from the Norma Parker/Kamballa complex. The reconfigured envelope further opens up the site to the Parramatta River foreshore.

The proposed new buildings in precinct F8 have been removed from the design, in response to concerns about built heritage as raised by the NSW Heritage Council, and location of the development to the Grey Headed Flying Fox Camp as identified by the Department of Planning and Environment.

The concerns of the NSW Heritage Council have been addressed in the revised ILP, particularly in relation to heights of buildings proposed in Precincts F5 and E3. The preparation of Conservation Management Plans for the PNUT area as a whole and for each precinct has also been agreed to by UrbanGrowth NSW (UGNSW).

The Heritage Council, as well as a number of other submissions, sought deferral of any rezoning of the Sports and Leisure Precinct comprising Precincts SA, SB, SC and SD due to concerns over impacts to Old Government House and Domain. The plan has been amended to prohibit residential development forms within these four Precincts addressing the concerns of land use conflict between the stadium precinct and potential residential development which have been raised.

The proposed amendments to the planning framework do not diminish future development assessment requirements and the continued requirement for heritage assessment and input, with the *Heritage Act 1977* still applying to future development. Proposals will be required to

demonstrate consistency with the ILP envelopes and demonstrate that the heritage values of the PNUT area and surrounding areas, including the Parramatta North Heritage Conservation area are maintained.

2.2 Issue - Heritage Views

Concerns were raised that the proposed building envelopes would adversely impact upon significant views and vistas.

Response:

The formulation of the ILP and the distribution of proposed building envelopes were subject to rigorous assessment and input from all heritage perspectives, including a detailed and thorough view analysis, aided by photomontages prepared for a range of views within the PNUT area and the broader locality. These photomontages were appropriate and accurate for the purpose of the assessment necessary as part of this process.

The assessment concluded that the proposed building envelopes will not have a significant impact on heritage views, particularly relating to Old Government House and Domain.

In response to concerns raised, and at the request of the NSW Heritage Council, a 3D model has been provided for further consideration of heritage impacts. The NSW Heritage Council in its response to the revised ILP on 1 April 2015 has confirmed that the revisions have:

- Addressed the concerns over the proposed 16 storey building envelope within Precinct E3;
- Reduced the height of building envelope within Precinct F2 from 3 storeys to 2 storeys;
- Reduced the height of building envelope in Precinct F5 from 12 storeys to 6 storeys;
- Revised the building envelope configuration in Precinct F3;
- Removal of formerly proposed building F7-1 and renaming of the F7-2 building as F7-1;
- Deleted buildings F8-2 and F8-4; and
- Altered the building footprint in G1 to open a view corridor running roughly east-west to the heritage building (building No. 83).

These amendments have responded positively to the concerns raised by the Heritage Council.

The proposed amendments to the planning framework do not diminish future development assessment requirements under Section 79C of the *Environmental Planning and Assessment Act 1979*. Proposals will be required to demonstrate consistency with the ILP envelopes and demonstrate that the heritage values of the PNUT area and surrounding areas are maintained.

These are appropriate matters for detailed assessment once buildings are designed, with the ILP, draft DCP and Built Heritage Management Plans providing appropriate guidance to future applicants and assessment bodies.

2.3 Issue - Eastern interface of the PNUT area

The interface of the development with North Parramatta, particularly in relation to height, visual impacts and impacts to the heritage of North Parramatta, was raised in a number of submissions.

Response:

The PNUT area north of Dunlop Street interfaces with land zoned B6 Enterprise Corridor. The interface south of Dunlop Street to Albert Street is to land zoned R4 High Density Residential. South of Albert Street the interface is primarily with land zoned R2 Low Density Residential. This southern area interface is separated by the Albert and O'Connell Street road carriageways.

Most taller buildings are accommodated in the north of the PNUT area and interface with existing B6 Enterprise Corridor zoned lands. The remainder of the interface area accommodates taller buildings that are separated from existing urban areas by existing roads. The urban design rationale underpinning the ILP has determined that the distribution of building height is appropriate and will not diminish important heritage views and vistas or the future character of an expanded Parramatta CBD currently being explored by Parramatta City Council.

Precincts H2 to H5 have been revised to set back the taller elements away from O'Connell Street and the conservation area to the east. This has resulted in lower height buildings to O'Connell Street and the breaking down of the presentation of the presentation to O'Connell Street in particular through the provision of landscape separation between the buildings.

The development principles of the ILP and draft DCP provisions provide appropriate controls for future development.

2.4 Issue - Traffic and Transport

Concerns have been raised relating to the traffic and transport assessment and the assumptions that underpin the conclusions and infrastructure upgrades, and that the car parking provision proposed would not be satisfactory to support future development.

Response:

The modelling and testing of the traffic and transport impacts were undertaken in consultation with NSW Roads and Maritime Services and Transport for NSW. The veracity of the approach and assumptions are considered valid and appropriate.

Parking rates are consistent with the approach used in Parramatta CBD by Parramatta City Council. This is appropriate given the site's location and the desire to encourage public transport options over private vehicle use.

Modelling and assumptions are based on a worst case scenario of no additional public transport infrastructure. If current considerations, such as light rail, include the PNUT area, this will improve the conclusions and mode split assumptions.

The proposal does not include a connection to Westmead, yet the ILP does not preclude this as a future option.

Committed infrastructure upgrades such as the cycle path and open space embellishment are subject to detailed design. Concerns raised by Parramatta City Council relating to the finish and standard of these facilities are matters of detailed design and implementation and should be addressed in future development applications, assuming the planning framework is amended as proposed.

The design includes proposed road and intersection upgrades to a number of intersections that service the PNUT area. These upgrades will be undertaken as development of the PNUT area progresses consistent with the Transport Access and Mobility Plan to be prepared in support of the renewal.

2.5 Issue - Grey Headed Flying Fox camp

Concerns were raised on the impact of future development on the health and continued viability of the Grey Headed Flying Fox camp located along the eastern bank of the Parramatta River foreshore.

Response:

A Grey Headed Flying Fox (GHFF) camp is located in Precinct O/S2 and near Precincts F7 and F8. The open space area in the vicinity is proposed to be managed consistent with the Ecological Management Plan prepared by Ecological Australia and lodged with the exhibited study. The location of the GHFF camp is not proposed to be relocated or removed. Implementation of the Ecological Management Plan (EMP) will avoid impact to the GHFF camp.

The Office of Environment and Heritage has recommended a 20 metre buffer to the GHFF camp and a 50 metre buffer to residential development. The ecological assessment notes that the camp can be highly mobile and migratory; embedding rigid setbacks and building locations on a non-static GHFF camp is not an appropriate response.

The ILP has also been revised to delete building F8-3, F8-2 and F8-5 in the vicinity of the GHFF camp. In addition the Ecological Management Plan allows for the constant changing of the camp location to be responded to as required and when work is proposed in the camp's vicinity. The EMP includes strategies to minimise noise, light spill and to avoid intrusive noise particularly in breeding season. The EMP also provides for the preparation of a vegetation management plan for the riparian corridor to control weed and revegetation with appropriate feed and habitat species.

This is considered a more sensible and logical approach to the ongoing management of the GHFF camp than numerical setbacks.

The ILP and proposed planning framework does not remove the requirement for future development applications in the vicinity of the GHFF camp to require assessment by the NSW Office of Environment and Heritage and the Federal Department of Environment consistent with the requirements of the *Environmental Protection and Biodiversity Conservation Act 1999*.

2.6 Issue - Overshadowing

Concerns have been raised that the proposed building envelopes will adversely impact on adjoining existing urban areas relating to loss of solar access and overshadowing.

Response:

The revised ILP and resulting building envelopes for the PNUT area has reduced the height of a number of buildings and in some cases removed buildings on the western and internal parts of the site. No increases in maximum overall height are proposed. Four precincts have seen reconfigurations in the location of the towers, namely A1, H2, H3, H4 and H5, G1, and G2. The

maximum height of the tallest buildings proposed in these precincts remains consistent with the maximum height of those proposed in the exhibited ILP. The refinements to the envelope locations have been made to the lower buildings in these precincts to facilitate the reallocation and distribution of the floor space undertaken to respond to concerns raised through the exhibition process.

The increase in shadow cast to surrounding properties is considered to be minor. The proposed building envelopes demonstrate that future buildings within these envelopes will be capable of complying with Parramatta Council's DCP 2011 which identifies a sunlight access requirement of 3 hours in winter between 9.00am and 3.00pm. This is achieved for the existing developments to the south and east of Precincts A1, A2, H2, H3, H4, H5, G1 and G2 between 12.00pm-3.00pm. The shadow diagrams at Attachment 7 show there is a minor change in shadowing from the exhibited design to that amended, however the impact is considered to be acceptable when measured against the standards of Council's DCP and the Residential Flat Design Code under the provisions of SEPP 65.

2.7 Issue - Potential residential development adjacent to Parramatta Stadium

Concern was raised that residential uses in Precincts SA, SB, SC and SD could potentially conflict with the use and activity associated with a major sports stadium.

Response:

In response, the amended study prohibits residential land uses in these precincts - a specific Local Provision in the Parramatta LEP 2011 will prohibit residential accommodation on these precincts within the Sports and Leisure Precinct.

2.8 Issue - Proposed heights to O'Connell Street in the Sports and Leisure Precinct

Submissions raised concerns around the relationship of the proposed building heights in the Sports and Leisure Precinct and potential impacts on the World Heritage-listed Old Government House and Domain.

Response:

The ILP shows 4 to 8 storey building heights in Precincts SA, SB, SC and SD. The proposed height and configuration of the building envelopes carefully considered view corridors to Old Government House and Domain and the area's heritage significance, and visual and landscape significance. The proposed building heights are appropriate in the context of the relationship with Parramatta Stadium (which sits approximately 12m above O'Connell Street) and the activation of O'Connell Street to support the stadium.

Revisions to the building heights are not considered necessary.

2.9 Issue - Dedication of Open Space to Council

Concerns were raised that the open space was not clearly proposed to be in public ownership and management.

Response:

The revised Land Zoning map nominates O/S1, O/S2, O/S3, O/S4 and O/S5 as RE1 Public Recreation instead of RE2 Private Recreation. This land is currently zoned B4 Mixed Use. The dedication of these areas to Parramatta City Council will ensure their long-term maintenance and management for community benefit and responds to concerns raised over their future management. The nomination of these areas as public open space zoned RE1 Public Recreation is consistent with the submission to the project prepared by Parramatta City Council.

The amended Land Zoning map also provides a 15 metre-wide strip of RE1 Public Recreation land in O/S1 and O/S2 along the Parramatta River foreshore. This land will ultimately be dedicated to Parramatta City Council as public open space. The long-term intention will be to deliver all of the land in O/S1 and O/S2 as public open space. This final dedication will be implemented once super lot subdivisions are undertaken and clear cadastral boundaries creating the open space lots are determined.

The amendments support the ambition to deliver the open space areas into public ownership.

2.10 Issue - Community Facilities

Concerns were raised that insufficient opportunity or proposed provision of community facilities had been included within the ILP.

Response:

The amended proposed zoning plan maintains a B4 Mixed Use zone to the majority of the PNUT area to provide a diversity of land uses in the PNUT area. As outlined in section 2.5, open space areas in the PNUT will be ultimately dedicated to Parramatta City Council as public open space.

Land zoned B4 Mixed Use includes heritage buildings that may be appropriate for adaption to alternate uses such as community facilities. The proposed planning framework does not impede this outcome and the proposed Built Heritage Management Plans may identify adaptive re-use for community purposes as appropriate to recognise the heritage values of the PNUT area.

Opportunities for the use of existing buildings for community uses will continue to be explored by UGNSW as government coordinators of the PNUT area. UGNSW is also continuing to liaise with the NSW Department of Education and Communities regarding the potential needs for education services.

2.11 Issue - Application of height controls to future roads

Concerns were raised that the proposed Height of Buildings map includes heights over the proposed roads and that the proposed height designations were inconsistent with the proposed ILP building envelope heights.

Response:

The draft Height of Building maps include the location of proposed future roads. This is consistent with the current Height of Buildings map applying to the site as the land is effectively englobo land with no dedicated public roads. The final location of future roads is not yet established by cadastral boundaries.

The height of building categories are based on the existing categories used in the current Parramatta LEP 2011 and Parramatta City Centre LEP 2007.

The draft Height of Buildings map introduces four designations to accommodate the various heights proposed in the ILP:

- R1 22 metres
- Y1 53 metres
- Y2 65 metres
- AB3 96 metres

These are included in the revised maps at Attachment 2.

2.12 Issue - Application of a Floor Space Ratio control

Concerns were raised that density controls via a floor space ratio (FSR) control were not included.

Response:

The proposed Gross Building Area control has been replaced with an FSR map in response to feedback and to provide consistency with the Standard Instrument LEP.

2.13 Issue - Affordable Housing provision

Concerns were raised that the proposed PNUT area did not include provision for or contribution towards Affordable Housing.

Response:

A Plan for Growing Sydney was released in December 2014, after the preparation of the study. Action 2.3.3 states that affordable housing will be provided in Government-led urban renewal projects. The exhibited study did not propose a specific target for affordable housing.

UGNSW is developing a comprehensive approach to the provision of affordable housing with in their development portfolio. Within the *Plan for Growing Sydney* it confirms that the NSW Government will:

- (1) Develop a comprehensive approach to this issue (affordable housing) that involves all stakeholders – the NSW Government, local councils and the private and community sectors; and
- (2) Provide affordable housing in Government-led urban renewal projects and on Government-owned sites to meet the shortfall in affordable housing.

The PNUT rezoning application includes land owned by NSW Land and Housing Corporation (LAHC) that, when rezoned, will have the capacity to deliver around 600 dwellings.

The PNUT area is government-owned and will provide affordable housing as required under *A Plan for Growing Sydney*. A comprehensive approach to the delivery of affordable housing will be

developed with LAHC, the Department of Planning & Environment and Parramatta City Council. The target set by UrbanGrowth NSW for the provision of affordable housing in the PNUT area is three per cent (3%) of the total development yield. The Schedule of Actions at Attachment 3 reflects this undertaking.

Further, the range of housing for the PNUT area is anticipated to include a significant proportion of housing that would be deemed as affordable to the medium income bracket.

2.14 Issue - Impacts of excavation on archaeology and the water table

Concerns were raised that the ILP and future development had not had regard to potential impacts on potential archaeology and the water table.

Response:

The ILP is based on an extensive assessment to avoid areas known to have the greatest archaeological potential. UGNSW has undertaken to pursue further detailed archaeological investigations to ground truth the assessment undertaken to date. These investigations will inform the preparation of appropriate management plans for the PNUT area to guide future development applications and assessments. The ILP has avoided areas of potential archaeological significance such as the land to the south of Precinct F8, minimising potential new building opportunities in Precinct F6 and F7 and in open space area O/S1 to the north of Precinct B.

If future development applications encounter the water table, the costs of managing potential water penetration will be a cost to the development.

2.15 Issue - SEPP 65 consistency

Concerns were raised that confirmation of the consistency of the ILP and future building envelopes with SEPP 65 was not provided.

Response:

The project urban designers have confirmed that the ILP has been prepared according to the principles of State Environmental Planning Policy 65 – Design Quality of Residential Flat Development (SEPP 65). The statement is provided at Attachment 4 to this submission. The design team has considered:

- Building separation;
- Floor to floor heights;
- Deep soil guidance; and
- Building orientation.

Solar access is based on the assumption that the design should meet the provisions for two (2) hours at mid-winter for apartments. No detailed testing has been undertaken on the indicative blocks, as this would be undertaken at development application stage. The envelope configurations maximise the ability of future detailed designs to achieve the relevant amenity requirements of SEPP 65.

The proposed building heights, particularly in Precincts A1, A2 and G1 are at the interface of the PNUT along O'Connell Street. The solar access studies identify that the shadow cast by these potential building envelopes is within the PNUT area until midday in mid-winter. Shadow begins to encroach into the areas to the east after midday. The analysis confirms the ability of these areas to the east to maintain three (3) hours of solar access in mid-winter, and is an appropriate outcome.

2.16 Urban Design Considerations - Precinct H

Concerns were raised that the building layout in H5 did not relate to the existing development to the east and that the building layout was a poor urban design outcome.

Response:

At precincts H2, H3, H4 and H5, the interface to O'Connell Street opposite the North Parramatta conservation area has been reduced by breaking down the perimeter building form into smaller blocks and relocating the 30 and 18 storey towers centrally into these precincts. The height of the building envelopes to O'Connell Street are now 4 and 6 storeys. The changes to the built form in the precinct are considered to address the concerns relating to the relationship to existing development and the building separation principles of SEPP 65. The taller building envelopes have been centralised into the Precinct to avoid the perception of visual dominance over the existing development east of these precincts. The revision to these precincts provides a much lower scale of building to O'Connell Street and provides physical breaks in the built edge presented.

The revised ILP proposes a 20 storey tower fronting Albert Street, positioned midway between O'Connell Street and Fleet Street. This revision results in the tallest element on the precinct perimeter being reduced from 30 storeys to 20 storeys, and shifted west away from O'Connell Street. Centrally within Precincts H3 and H4 are proposed a 30 storey tower and an 18 storey tower. The 18 storey tower replaces the previously proposed 20 storey tower. To the south of the 30 storey tower is a proposed 24 storey tower. The proposed 20 storey tower in Precinct H5 fronting Fennell Street is consistent with the tower form exhibited.

Of more important consideration is the built form relationship to O'Connell Street and residential development to the east of these precincts. The revision to Precincts H2, H3, H4 and H5 has relocated the taller elements to within the area bound by O'Connell, Albert, Fleet and Fennell Streets, away from the existing residential areas. The removal of the 30 and 18 storey elements along O'Connell Street significantly reduces the built form presentation. The proposed 4 and 6 storey building envelopes have been further modulated by including separations between the building envelopes. This approach further breaks down the building bulk and will permit the landscape settings to contribute to the future character of O'Connell Street. Importantly the exhibited maximum building heights proposed have been maintained but relocated away from the O'Connell Street frontage.

The existing development on the eastern side of O'Connell Street includes low scale heritage cottages interspersed with three (3) and four (4) storey older style residential flat buildings. The proposed four (4) and six (6) storey building forms proposed in Revision 15f appropriately transition to this context. The suitability of the relationship is reinforced by the physical separation created by the approximately 22.0m wide O'Connell Street road reservation and the four (4) formed traffic lanes.

The centralisation of the taller forms on Precincts H2, H3, H4 and H5 further reduces the solar access impacts. The modification proposed in the revised ILP increases the levels of solar access that will be able to be maintained through the redevelopment of the PNUT area than those in the exhibited version (refer Attachment 7 for overshadowing diagrams).

2.17 Issue – Insufficient consultation with the Aboriginal community

Concerns were raised that insufficient engagement with the Aboriginal community had been undertaken given the site archaeological and cultural significance.

Response:

The Schedule of Actions at Attachment 3 includes the undertaking to prepare an Aboriginal Archaeological and Cultural Heritage Management Plan (AACHMP). The preparation of this plan will include further consultation with the Aboriginal community in accordance with the Office of Environment & Heritage's (OEH) *Aboriginal cultural heritage consultation requirements for proponents 2010*.

2.18 Issue – Loss of public land and existing open space

Concerns were raised over the loss of existing public land and existing open space and open space facilities.

Response:

The PNUT area is currently in public ownership via numerous State government agencies; however public access to the majority of the area is restricted. The proposed amended planning framework seeks to facilitate renewal of the area to protect and maintain significant heritage places and facilities and to open the site to the public through the provision of a new road and open space network.

The ILP and proposed zoning plan includes Precinct SA, SB, SC and SD along O'Connell Street that are currently zoned RE1 Public Recreation and RE2 Private Recreation. These areas are proposed to be zoned B4 Mixed Use and are currently occupied by car parking and the Parramatta Swimming Pool.

The ILP does not enforce the removal of the pool or prohibit the continued use as a pool. The future use of these lands will be a decision of the Parramatta Park Trust and Parramatta City Council as the lease holder for the pool. The potential loss of the land zoned open space and utilised for car parking is considered to be compensated for by the proposed new open space areas O/S1 to O/S5.

2.19 Issue – Parramatta Gaol should be included

Concerns were raised that the ILP and proposed zoning plan should include the Parramatta Gaol and associated land.

Response:

The study has been prepared for State government agency land only and does not include any private or non-government owned lands. The ILP has been prepared in a manner that would

facilitate future integration of the Parramatta Gaol site and lands. The ILP as prepared does not hinder the future exploration of options for these lands.

2.20 Response to Agency Submissions

The issues raised in the Agency and Parramatta City Council submissions are addressed below.

Agency	Response
Parramatta City Council	
Heritage restoration strategy and management to be clarified	UGNSW will prepare a range of heritage management strategies, further archaeological testing and heritage interpretation strategies to guide and inform the ongoing restoration and re-use of the heritage of the PNUT area. The heritage interpretation strategies will operate in conjunction with Conservation Management Plans that will be prepared prior to the lodgement of Development Applications for the development precincts.
Public domain management and implementation of upgrades to be clarified	Open space has been zoned RE1 Public Recreation and is to be dedicated to Parramatta City Council. The creation of the open space lots and the embellishment will proceed with super lot subdivisions. The delivery and staging of these facilities will be the subject of ongoing negotiation with Council.
Recreational, cultural and social needs of the future development requires further analysis	The amended study proposes direct delivery of public open space to Council as well as transport networks, roads and pathways. It will deliver significant development contributions to Council and includes a range of buildings and places suitable for adaptation to community needs.
Transport infrastructure – development should be supported by light rail	Delivery of light rail is not within the remit of the study. The transport assessment has been undertaken on the basis that light rail does not service the PNUT area in order to test a worst case scenario. If light rail proceeds and services the area this will be a substantial improvement to the area's transport options.
Sports and Leisure Precinct – concerns over compatibility of residential use and visual prominence	The amended study prohibits residential accommodation in the Sports and Leisure Precinct following concerns over conflicts with the stadium precinct. Part 6 of the LEP will prohibit 'residential accommodation' as a land use despite any other provision of the plan. The height of the envelopes is commensurate with the stadium and will be required to comply with the existing draft DCP controls prepared in response to the World Heritage listing of Old Government House and Domain.
Education infrastructure should be identified	UGNSW will continue to discuss the potential for new school infrastructure with the Department of Education and Communities.
Prioritisation requested of existing amending LEPs	Council requests that UGNSW champion existing Council planning proposals for the Parramatta CBD through the Department of Planning

Agency	Response
prepared by Council for the Parramatta CBD	and Environment. The request is noted.
Open space proposed should be dedicated free of cost to Council	<p>The amended study reflects Council's request for open space area O/S3 to be rezoned to RE1 Public Recreation for dedication to Council. O/S4 has also been zoned RE1 Public Recreation for dedication to Council.</p> <p>The Parramatta River foreshore is also proposed to be zoned RE1 Public Recreation for a minimum width of 15 metres or to within 10 metres of the proposed building envelopes - whichever is the greater. This land also would ultimately be dedicated to Council for public foreshore access and recreation.</p>
Design excellence processes	<p>The draft DCP has been amended to require applications of 5 or more storeys to be considered by Parramatta City Council's Design Excellence Advisory Panel. The amended study does not seek to have the design excellence provisions via design competition to apply to the PNUT area. The proposed height and FSRs have been carefully considered in regards to complex heritage considerations.</p> <p>The potential for 15 per cent variations to the height and FSR controls that are otherwise available under the design excellence provisions of the Parramatta LEP would undermine the specific design analysis of PNUT.</p> <p>The proposed SEPP amendment should expressly exclude the application of the Design Competition and height and FSR bonuses from applying to the site.</p>
Office of Environment and Heritage	
Biodiversity – potential impacts on the GHFF camp	<p>Concerns were raised about the proximity of potential development to the GHFF camp. The GHFF camp will be managed in accordance with the Ecological Management Plan prepared for the camp and future works undertaken or amended accordingly.</p> <p>The management plan will operate in conjunction with the deletion of building F8-2, F8-3 and F8-5 from the vicinity of the camp.</p> <p>Rather than proposing physical works, this study establishes a framework for assessing development applications. Potential impacts on the GHFF camp will be addressed if future works are proposed near the camp.</p>
Aboriginal cultural heritage	Development plans have not been finalised. The ILP shows potential future building envelopes. UGNSW will prepare an Aboriginal Archaeological and Cultural Heritage Management Plan (AACHMP)

Agency

Response

that includes:

- Further research;
- An updated history; and
- Targeted geotechnical testing.

This will be prepared in consultation with the Aboriginal community in accordance with *Aboriginal cultural heritage consultation requirements for proponents 2010*.

Flood risk management assessment suitability

Future development applications will address Parramatta City Council's flood risk management requirements. The original assessment by Hyder Consulting identified that the contemplated future development of the site is capable of complying with the relevant assessment requirements.

Commonwealth Department of the Environment

Visual impact of Precincts SA, SB, SC and SD on Old Government House and Domain

Precincts SA, SB, SC and SD are located in an area of potential visual sensitivity for the curtilage of the World Heritage-listed Old Government House and Domain. The draft DCP will act as a tripartite agreement between three levels of government.

Precincts SA, SB, SC and SD are within areas A1 and A2 of the draft DCP and provide development controls to manage potential development in the visual catchment of Old Government House and Domain. The draft DCP provisions will continue to apply to these four precincts and require that future development demonstrate that not more than 80 per cent of the built form is above the tree canopy if the important view lines are not already screened by the building mass of the existing stadium.

Precincts SD and SC are subject to a maximum height limit of 16 metres and 22 metres. These heights are below the height of the existing stadium and will not have a significant impact on the sensitive view corridors from Old Government House and Domain.

Precincts SA and SB are subject to heights of up to 28 metres and propose buildings ranging from 6 to 8 storeys. Future final designs will be required to comply with these heights and demonstrate the consistency with the protection of the view corridors of Old Government House and Domain.

Education and Communities

Future education needs and opportunities

UGNSW is committed to continue liaison and discussions with the Department of Education and Communities regarding the provision of education facilities. These discussions will continue through the

Agency	Response
	implementation of the PNUT, should the planning framework amendments be made.
NSW Environment Protection Agency	
Noise	In response to the concerns over land use conflicts between Parramatta Stadium residential development, the amended study prohibits residential accommodation in Precincts SA, SB, SC and SD that are adjacent to Parramatta Stadium.
Water quality	<p>The proposal adopts Parramatta City Council's water quality targets which are derived from the Parramatta River Catchment Management Plan.</p> <p>The detailed design and approach to water cycle management and sewage management will continue to be investigated by UGNSW should the planning framework be amended and the project move into the delivery phase.</p>
Waste management	Future development will be required to comply with Parramatta City Council's waste management requirements, as regularly amended. Updates of the DCP provisions outside those specifically proposed for the PNUT area are a matter for Parramatta City Council.
Contaminated land management	The PNUT area has been subject of preliminary site assessments. UGNSW will address concerns to ensure the land is suitable for future development and to meet the requirements of SEPP 55.
Heritage Council of NSW	
Waterways should be zoned W1 Natural Waterway	While the Parramatta River adjoining the PNUT area is zoned W1 Natural Waterway, the PNUT area does not include the waterway or propose any amendment to this existing zone.
Areas identified as open space should be zoned RE1 Public Open Space	The amended study proposes to zone open space O/S3 and O/S4 RE1 Public Recreation for future dedication to Parramatta City Council. In addition a 15 metre strip along the Parramatta River foreshore is also to be zoned RE1 Public Recreation, covering open space O/S1 and O/S2 to permit future dedication to Council. The balance of the foreshore setbacks will also be dedicated to Council as open space as super lot subdivisions occur and boundaries are confirmed.
Building heights should not be imposed on proposed RE1 Public Recreation land	<p>The amended Height of Buildings map applies a 6 metre maximum height limit on any land proposed to be zoned RE1 Public Recreation.</p> <p>Building heights will continue to apply to the location of future roads consistent with the practice of the current height designations and planning for englobo land.</p>

Agency	Response
<p>Height of buildings excessive in Precincts F5, F8 and F9, and height designations do not match the number of storeys nominated in the ILP.</p>	<p>The amended ILP reduces the building heights and deletes wings and buildings from within Precinct F8. There are no longer new buildings proposed in Precinct F8.</p> <p>The proposed 12 storey building in Precinct F5 has been reduced to a 6 storey building to address visual impacts raised in the submissions.</p> <p>Two buildings in Precinct F9 have been deleted to further open up the foreshore and views to Bethel House.</p> <p>The amended Height of Buildings map has been critically reviewed to ensure the height in metres are consistent with the number of storeys proposed in the ILP.</p>
<p>Floor space ratio</p>	<p>The Gross Floor Area map proposed has been amended to an FSR control.</p> <p>The total floor space to be accommodated in the PNUT area has been translated to FSRs for each precinct, including an allowance for existing heritage floor space of buildings to be retained.</p>
<p>Parramatta Pool</p>	<p>The study does not propose the removal or relocation of the pool. The future of the pool is a matter for the Parramatta Park Trust and Parramatta City Council. The proposed zoning to the land on which the pool is located provides opportunity for many options, including a redeveloped leisure facility.</p>
<p>Section 4.3.5.4 incorrect section references included</p>	<p>The drafting error is noted and has been updated in the revised draft DCP.</p>
<p>Design excellence</p>	<p>The design excellence provisions have been amended to apply to buildings of 5 or more storeys consistent with the suggestion.</p>
<p>Section 4.3.5.7 open space incorrect figure reference included</p>	<p>The drafting error is noted and has been updated in the revised draft DCP</p>
<p>Section 4.3.5.11 – alternate clause wording suggested.</p>	<p>The alternate wording is noted and has been included in the revised draft DCP.</p>
<p>Section 4.3.5.11 – alternate clause wording suggested.</p>	<p>The alternate wording is noted and has been included in the revised draft DCP.</p>
<p>Section 4.3.5.11 – alternate clause wording</p>	<p>The alternate wording is noted and has been included in the revised draft DCP.</p>

Agency

Response

suggested.

Precinct SD – the study area extends too far south on the mapping

The study area boundary has been amended to not project south of Precinct SD building footprint with the area south of the building envelopes to remain as open space within Parramatta Park.

3D model

UGNSW has provided a 3D model to the Department of Planning & Environment and the Heritage Council of NSW for further consideration in conjunction with the revisions to the ILP. These revisions have include the removal of the 16 storey building form Precinct E3, reduction of the building envelope in Precinct F2 from 3 storeys to 2 storeys, reduction in the building envelope in Precinct F5 from 12 storeys to 6 storeys and reconfiguration of the building envelope in Precinct F3 to reflect the comments of the Heritage Council sub-committee .

The Heritage Council has stated that these revisions have addressed the Heritage Council's concerns relating to the proposed planning framework for the Cumberland Precinct.

The Heritage Council has sought deferral of any rezoning within the Sport and Leisure Precinct. The revised ILP has not deferred this area but the framework has been amended to prohibit residential development within Precincts 5A, 5B, 5C and 5D. UGNSW understand that deferral of this area of the study could be an outcome form the assessment being undertaken by the Department of Environment and Planning.

Conservation Management Plan

The Heritage Council of NSW requires that a Conservation Management Plan be prepared for the PNUT area and that a specific Conservation Management Plan be prepared for each development Precinct. The Schedule of Actions at Attachment 3 includes this undertaking.

Transport for NSW

Requirement to prepare a transport management and accessibility plan (TMAP) prior to lodging development applications

UGNSW will prepare a TMAP prior to the lodgement of development applications involving additional buildings on the PNUT area if the amendment to the planning framework is undertaken.

That UrbanGrowth NSW, Parramatta City Council and Transport for NSW agree to the extent of infrastructure works identified in the TMAP.

Arising from the TMAP process, UGNSW will liaise with Parramatta City Council and Transport for NSW regarding the extent of works identified through the TMAP process.

Agency	Response
<p>Prior to lodging a development application, UrbanGrowth NSW develop a funding strategy (agreed to by Transport for NSW) for the cost and responsibility for delivering transport and infrastructure works related to the development, to be endorsed by Cabinet.</p>	<p>Transport for NSW manages the identified arterial roads; accordingly management of budget responsibilities should rest with Transport for NSW.</p>
<p>The proposal recognises the potential to impact additional components of the regional transport network including, but not limited to:</p> <ul style="list-style-type: none"> • Windsor Road/Cumberland Highway, Pennant Hills Rd/James Ruse Drive • Victoria Road including the interchange with James Ruse Drive • Great Western Highway, including the intersections with Pitt Street & O'Connell Street • Bus circulation and access routes into the CBD, including Argyle and Church Streets. 	<p>The TMAP will include analysis of relevant intersections which will be further identified in consultation with Transport for NSW and Parramatta City Council. UGNSW anticipates the need to upgrade the following intersections based on the traffic modelling:</p> <ul style="list-style-type: none"> • Church Street/Board Street – upgrade to a partial signal (west side of Church Street only); • Church Street/Barney Street – additional right turn lane from Church Street; reconfigure Barney Street approach lanes; • Intersections on Church Street between Factory Street and Grose Street – an additional through lane for southbound traffic in the AM peak; an additional northbound through lane for the PM peak for the intersections on Church Street between Barney Street and Grose Street; • O'Connell Street intersection at Barney Street and Factory Street – upgrade to a signal; • O'Connell Street intersection at Dunlop Street and Fennel Street – upgrade to a one-lane roundabout; • O'Connell Street/Victoria Road signalised intersection – revise lane configuration. <p>Further intersections may be subject to traffic impact analysis via the TMAP process and may not be the same intersections identified by Transport for NSW in the submission.</p>

Table 2: Response to Agency submissions

2.21 Supporting report clarifications

The assessment has identified minor drafting errors in Appendix A of the Built Heritage Report included with the study. These clarifications are highlighted below.

Area 6 – Hospital for the insane

Building CH55a was correctly mapped as being of moderate heritage significance but incorrectly listed in the corresponding table as having little heritage significance. For clarity building C55a has a moderate heritage significance.

Building CH55b was correctly mapped as being of little heritage significance but incorrectly listed in the corresponding table as having moderate heritage significance. For clarity building CH55b has little heritage significance.

Area 4b and Area 8

A concern was raised that two buildings of moderate heritage significance in the vicinity of proposed open space O/S3 were not shown in the summary maps or tables.

It is confirmed that the two (2) buildings in question (CH78 – Gardener’s Cottage and CH80 – Matron’s Cottage) are shown. The buildings are indicated on one of the two Precinct 4 diagrams and included in the table incorporated into the Built Heritage Summary – Cumberland Precinct (Appendix A) of the Built Heritage Assessment. These two (2) buildings are also shown on the Summary Built Heritage Significance Diagram for the Cumberland Precinct (Figure 78 of the Built Heritage Assessment).

The confusion may have arisen from the buildings being shown in Precinct 4b of Figure 4 of the Built Heritage Assessment but without any differentiation between Precinct 4a and 4b in the Built Heritage Summary precinct diagrams.

3.0 Conclusion

The amended proposal responds to the concerns raised by reducing floor space and removing buildings in the most significant areas of Precincts E3, F2, F5, F8 and F9.

The amended proposal also designates land as public open space to be dedicated to Parramatta City Council and has prohibited residential development in the Sports and Leisure Precinct to avoid land use conflicts with the stadium use.

The proposed refinement of Precincts H2, H3, H4 and H5 in the revised ILP significantly reduce the bulk and scale of proposed development to O'Connell Street. The proposed built form further modulates the interface between the PNUT area and the existing residential areas to the east. The revised ILP represents a suitable balance between the provision of development to deliver the identified heritage and social benefits of the renewal of the PNUT area and the interface with North Parramatta.

Technical concerns have been addressed through the inclusion of a FSR map as an overall guide to maximum development potential.

The amended proposal establishes an appropriate planning framework to guide the renewal of the PNUT area. It will establish an appropriate policy framework for the consideration of future development applications to this important area of Parramatta.

The proposed planning framework will facilitate future development leading to the renewal of the PNUT and the adaptive re-use of significant heritage buildings and places. The proposed planning framework will lead to the establishment of an active precinct that facilitates public access into and through an area that is currently largely unavailable and inaccessible to the public. Redevelopment consistent with the Indicative Layout Plan (ILP) will deliver improved infrastructure for the locality and provide recreation and park areas for use by the wider community. The proposed built form envelopes are of appropriate height, bulk and scale and will deliver beneficial outcomes for the site and the broader community.

The amended study is commended to the Department of Planning & Environment. A recommendation to proceed to make the plan is requested.



Attachments

Attachment 1: Summary of Submission Issues and Responses

ITEMS FROM PUBLIC SUBMISSIONS (including The National Trust)

No.	Item Description	Response
Urban Design		
1	The proposal has failed to consider the impact of numerous high-rise buildings on emergency air services to the Westmead Hospitals.	NSW Health have been a key stakeholder in the development of the plan and the requirements of their key services has been fully considered.
2	Shadow diagrams should be provided for each of the existing heritage buildings, including the cumulative impact from existing development.	Shadow diagram has been provided in the report, the massing and bulk of buildings has been developed to minimise impacts on existing buildings within the site and the surrounding suburbs. Further detailed analysis will be undertaken at DA stage for future development on this site.
3	The taller buildings will have a visual impact on the existing surrounding areas. This will have a detrimental impact on existing property values.	A visual impact analysis has been undertaken by Musecape which considers the development from both within the site and on the local streets where there is an interface with existing development.
4	The adverse social impacts of high density residential development have not been adequately examined.	Numerous studies have been undertaken that demonstrate the benefits of high density development: http://www.highdensityliveability.org.au/about120_high_density_Living_impacts.php
5	No justification is provided for the scale of development proposed. It appears that there is no basis for the target of 4000 dwellings.	The proposal has been subject to extensive heritage assessment with the objective to create a redevelopment of the PNUR area that recognises the significant heritage of the area and provides the ability for the significant heritage buildings and places to be protected, and re-used. The development opportunities identified will facilitate these heritage protection works.
6	Developments planned for Camelia, Westmead, Rydalmere and the CBD (including high rise) are sufficient to address housing for a growing	The proposal is consistent with the broader vision for Parramatta to be the major regional centre for Sydney. The proposal seeks to deliver a renewal of the area that protects the significant heritage and provides housing and employment choices in a

	Parramatta, without developing the Parramatta North site.	location extremely well located in proximity to the Parramatta CBD and Westmead health campus.
7	Building separation and development in general should be in accordance with SEPP 65.	Future Development Applications will be required to demonstrate consistency with the SEPP 65 design principles.
8	The proposed buildings will create wind tunnels.	Detailed modelling of environmental impacts would be undertaken at DA stage if requested by Council.
9	Historic buildings and sites may become damaged by resident children and teenagers. Security measures such as CCTV cameras and fences should be provided to prevent crime and vandalism.	Principles of Crime Prevention Through Environmental Design CPTED have been considered in the development of the ILP to ensure factors such as natural surveillance and personal safety are achieved.
10	Concern about the impact of the proposed heights of the buildings on the corner of Albert Street and O'Connell Street. A 30 storey tower is proposed to be built opposite two heritage houses. Other heritage houses would also be diagonally across the street from an 18 storey tower. This site had development consent for 91 units.	<p>The height of the proposed new building forms would result in some visual impacts on the generally low-scale (1-2 storey) character of the North Parramatta Conservation Area.</p> <p>The 30 and 18 storey towers fronting O'Connell Street opposite the North Parramatta conservation area have been relocated away from the street frontage. The maximum heights proposed opposite the conservation area now 4 and 6 storeys in height. The proposed building envelopes in the ILP and draft DCP have been located to minimise the impacts on the more significant areas including the former Female Factory/Parramatta Lunatic Asylum precinct and the Norma Parker/Kamballa precinct as much as possible.</p>
11	Albert Street does not link to Fleet Street, except by a partially heritage-walled staircase. It is a dead-end street. The proposal shows the two streets as being connected. As this is a cliff-face, are there un-submitted building plans or engineering plans for a bridge or other type of road construction?	The topography in the locality would preclude vehicular connection. Albert Street would remain a dead end street for vehicular traffic.
12	Include a reasonable-sized supermarket along with sufficient restaurants, cafes and specialty shops congregated together to foster the community's sense of place. Failure to do so will see residents drift to Westfield and Church Street leaving the precinct soulless at night time and	A location for a town Centre in the west of the Cumberland Precinct is identified in the urban design report.

	weekends.	
13	There are no major shopping areas in North Parramatta. Westfield Parramatta, Northmead and North Rocks are currently used by local residents for their weekly household requirements. These places are not adequately served by publicly transport.	A location for a town Centre in the west of the Cumberland Precinct is identified in the urban design report.
14	The precinct should be connected via a pedestrian walkway/cycleway over Darling Mills Creek from the public park at the southern end of Kleins Road.	This should be considered as part of the design for the northern portion of land in the Cumberland Precinct that was not considered as part of this study.
15	The development of massive 30, 20 and 18 storey tower blocks will cause overshadowing of all property to the east of them, including the Heritage listed buildings in Albert and O'Connell St, and North Parramatta Primary School during winter.	<p>Shadow diagram has been provided in the report, the massing and bulk of buildings has been developed to minimise impacts on existing buildings within the site and the surrounding suburbs.</p> <p>Further detailed analysis will be undertaken at DA stage for future development on this site.</p> <p>The height of the proposed new building forms would result in some visual impacts on the generally low-scale (1-2 storey) character of the North Parramatta Conservation Area. As noted the 30 and 18 storey towers proposed have been relocated way from the O'Connell Street frontage with 4 and 6 storey individual blocks now proposed opposite the North Parramatta conservation area. The proposed building envelopes in the ILP and draft DCP have been located to minimise the impacts on the more significant areas including the former Female Factory/Parramatta Lunatic Asylum precinct and the Norma Parker/Kamballa precinct as much as possible.</p>
16	The proposed residential towers will overlook into the school.	This will be a consideration for future DAs of development on the site.
17	It is unclear how 2-6 Albert Street be impacted. Are there plans to rezone and demolish?	This site is not included in the rezoning.
18	There should be no residential development on the precinct. Parramatta already has extensive residential development. The existing residential	The proposal is consistent with the broader vision for Parramatta to be the major regional centre for Sydney. The proposal seeks to deliver a renewal of the area that protects the significant heritage and provides housing and employment choices in a

	development in Parramatta needs to be balanced with recreational and other development.	location extremely well located in proximity to the Parramatta CBD and Westmead health campus.
Public Domain		
19	The existing open space will be required as public open space as the Parramatta LGA population grows. Parramatta North open space should not be developed. It should be conserved and incorporated into Parramatta Park.	The ILP includes the objective of removing existing car parking areas south of the stadium precinct and their re-instatement as open space. The proposal has been amended to include the identification of open space areas OS3 and OS4 as public open space dedicated to Parramatta Council. Open space areas OS1 and OS 2 along the Parramatta River foreshore would ultimately also be dedicated to Council as public open space expanding the network of public open space.
20	The proposed cycle path should extend the full length of the site along the edge of the river.	The deviations of the cycle path away from the river foreshore have been included to minimise impacts upon the flying fox colony. If the flying fox colony was not present the cycle path could run along the entire foreshore. The route proposed is an appropriate compromise between competing site considerations.
21	All paths or 'links' to accommodate pedestrians and cyclists and need to be a minimum of 3m wide.	The pedestrian cycle ways and shared paths will be deigned in accordance with appropriate Australian Standards.
22	The proposal noted that the provision of bicycle parking will be provided in accordance with the Parramatta Development Control Plan (currently 1 bicycle space per 2 dwellings). It is suggested instead that residential flat buildings have a bicycle parking rate of 1 bicycle space per dwelling.	The current Parramatta DCP rates have been adopted for consistency across the Parramatta LGA. Should Council alter its rates, any future rates would automatically apply.
23	For commercial premises, stronger provisions around end of trip facilities need to be included instead of 'adequately service the number of bicycle parking spaces required'. It is recommend that one locker to each bicycle parking space and one shower for the first 5 employee bicycle spaces be provided, plus one to each 10 employee spaces thereafter.	Parramatta DCP requirements are to be relied upon to maintain consistency for the whole LGA.
24	The proposal ignores the once in a lifetime opportunity to provide a riparian conservation zone along the Parramatta River that will provide natural bushland areas, (after weeding and bush	The foreshore is to be retained and rehabilitated as a natural amenity as well as a recreation resource that would ultimately be dedicated to Parramatta Council as public open space.

	regeneration) and open space for the people of Parramatta.	
25	There is scope for an integrated public precinct along the Parramatta River in Parramatta LGA and beyond. It must include UWS Rydalmere and the former Cumberland Hospital.	Open space areas OS1 and OS 2 along the Parramatta River foreshore would ultimately also be dedicated to Council as public open space expanding the network of public open space and linking into the wider Parramatta LGA.
26	There should be outside recreation areas and pathways that maximise pedestrian and cycleway access and minimize car use.	The ILP includes a comprehensive path network linking into the existing facilities to encourage travel by means other than by private vehicle.
27	Management of the public domain is not clear. The most appropriate management entity for the foreshore and public domain is Parramatta Park Trust and it is appropriate for Wisteria Gardens and the riverbank lands leading to Phillip's Landing site to be incorporated into the Parramatta Park Trust lands so that these significant cultural landscapes are contiguous and managed by an entity with heritage and landscape expertise.	The areas of public open space within the ILP are proposed to be dedicated ultimately to Parramatta Council.
28	Public space area identified as O/S3 in the Indicative Layout Plan should be dedicated to Parramatta Park Trust free-of-cost, and that it be zoned RE1 Public Recreation accordingly, not RE2.	The proposal has been amended to propose these areas as RE1 Public Open space to be dedicated to Parramatta Council.
29	Of the 30 hectares in the Cumberland Precinct, only OS/1, OS/2, OS/3, O/S4 and E3 are designated open space. This represents approximately 6 hectares of the total. This alienation of 80% of the original public land to open space use is contrary to the commitment of Governments to create more green space by 2020 under the 202020 vision.	The site is currently not readily open to public access. The ILP through the creation of public roads as well as the network of open space and access paths will be highly accessible and contribute to the open space network.
30	Of the 6 hectares of open space, pedestrian river access is limited adjacent to Lot F8. The open space will be reduced by the river embankment	The ILP provides for foreshore access to the Parramatta River. The Study has been amended to zone the foreshore as RE1 Public Recreation for a minimum width of 15.0m or to within 10.0m of the proposed building envelopes.

	and overshadowed by private buildings of up to 6-8 storeys.	
31	The remainder of the delineated green space in the Cumberland Area is designated private ownership. The draft DCP shows some "public space within the Lot". The DCP and Framework are lacking in any detail as to how this nominal "public space" will be accessed, delineated and maintained on what will be private land, particularly given that "public access should be balanced with the privacy or security needs of the development." [Framework, p. 36].	Open space areas OS 3, 4 and 5 are proposed to be dedicated to Council. The open space with each development area would become an extension of the public domain established by the road network and be subject to detailed design consideration with future development applications.
32	The subject of heritage landscape and retention and possible removal of trees is outside my scope of expertise except to say that the DCP should be quite clear at this stage what is proposed. Phrases like "retain if practicable" are too loose. Particularly given that the adjoining Parramatta Park tends to comprise a more open, sparse layout in terms of vegetation, it seems counter-productive to be removing mature trees only to replace them later. The argument provided in support of removal, namely "trees are finite", is not a considered and "world class" justification.	The vegetation must also be considered in the context of the proposed tree maintenance and succession planting plan which will formulate the strategy to augment and renew the canopy progressively across the PNUR as development occurs.
33	The reduction of gardens and greenery to counteract pollution and CO2 emissions is of concern. Suitable planting to replace removed greenery must occur. The high site cover that is proposed allows denser bigger dwellings to eliminate areas formerly developed for shade trees and gardens which provide important habitat for urban wildlife.	The ILP establishes a public domain network that will be landscaped with the tree canopy to be managed by the tree maintenance and succession planting plan to be implemented as part of the development of the site.
Statutory Planning		
34	The building at corner of Albert and O'Connell was previously approved a 3 storey development.	The study proposes the revision of the planning controls applying to the land. The nature and extent of buildings proposed will be subject to future Development

	Previous information (July 2014) was for affordable housing (3 storey) was to be built. The new proposal is for significantly higher development. The new development will block existing views from residence to wider Parra area, therefore impacting sales value.	Applications.
35	Details of the proposed buildings were not made available for review and comment.	The PNUR is a process to amend the zoning applying to the land. Details of proposed buildings will be subject to future Development Applications.
36	Independent and transparent studies should be undertaken prior to the issue of any approvals. The consultants should have no alignment to UrbanGrowth NSW or the NSW Government.	<p>The PNUR study has been prepared and is being assessed by the NSW Department of Planning and Environment in accordance with the established process for the consideration of State Significant Site studies.</p> <p>The removal of buildings and structures of moderate and little significance or that are intrusive is required to accommodate the level of development needed to ensure the viability of the project. The proposed building envelopes in the ILP and draft DCP have been located to minimise impacts on the most significant areas of the site as much as possible.</p> <p>The significance rankings for the buildings and structures on the Cumberland and Sports and Leisure precincts has been drawn from the 1998 and 2010 Conservation Management Plans. Some minor adjustments have been made to acknowledge changes in condition and integrity.</p>
37	A neighbouring resident applied to Parramatta City Council to have a garage with a studio level built at the rear of their property. The development application was rejected due to being too high for neighbouring properties with privacy cited as the issue together with height restrictions. The proposed redevelopment project of Parramatta North allows for a six story apartment building at the rear of our single level heritage listed property. This would replace the three story department of housing owned building	The assessment by Parramatta Council of other applications is irrelevant to this application.

	that currently exists.	
38	DCP for Parramatta North must require that any proposal that includes or adjoins a heritage listed property must address how the proposal meets the controls of the DCP as well as how the proposal will positively engage with the environment surrounding the item itself without compromising the historical value of the site.	<p>This is a standard assessment requirement under Section 79C of the <i>Environmental Planning and Assessment Act 1979</i> (EPA Act 1979).</p> <p>The draft DCP requires that a Heritage Impact Statement (HIS) be submitted as part of the Statement of Environmental Effects for all development applications. The HIS would need to identify and assess the potential impacts of the proposal on the heritage significance of the place or any other heritage places in the vicinity—refer to C.2 of 4.3.5.10. This requirement is also included in the general planning controls of the <i>Parramatta DCP 2011</i>.</p>
39	DCP Section 4.3.5.2 an additional objective: <i>*Habitat: To retain remnant habitat and to provide innovative natural habitats to ensure the continuation of current native fauna populations</i>	The additional objective has not been included as the existing legislative framework relating to protection of flora and fauna is considered sufficient in this instance.
40	DCP Section 4.3.5.3 Remove (10 or more storeys) and replace with (5 or more storeys)	The Draft DCP has been amended to require Design Excellence Advisory Panel (DEAP) assessment for applications involving buildings of 5 or more storeys.
41	DCP Section 4.3.5.4 Include: <i>*Flood shear force provisions</i>	All flood risk management requirements of Parramatta Council will apply to future development on the site.
42	DCP Fig 4.3.5.6 Include: <i>ground cover plants, a shrub, and nest box on the tree</i> (this is consistent with the PNUR Landscape rezoning report and the PNUR Ecological Management Plan)	The provisions of the Ecological Management Plan are to be implemented outside the DCP provisions.
43	DCP 4.3.5.7 Include: <i>0.7 Retain current bank stability of Parramatta River and Darling Mills Creek</i> (This is consistent with the PNUR Landscape rezoning report).	Noted and is a requirement of Parramatta Council's existing policies that will apply to future development of the site.
44	DCP 4.3.5.7 0.5 change to <i>Contribute to stormwater and ecological</i>	All stormwater management and water quality requirement of Parramatta Council will apply to future development applications for the site.

	<i>improvement</i>	
45	The proposed re-zoning of Parramatta Park Trust land along O'Connell Street is strongly opposed. The proposed zoning does not make clear compatible and complementary uses to safeguard visual impacts and recreational amenity on Parramatta Park and Old Government House.	The proposed amended zoning applies to the land along O'Connell Street that is already been highly disturbed and developed. The build for controls have been prepared to be consistent with the visual impact controls to protect the vistas to Old Government House and Domain.
46	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.	<p>The study continues the B4 Mixed use zone applying to the PNUR to the O'Connell Street frontage which has already been developed. The zone permits a range of land uses, not just residential. Any development on this area of the PNUR would be required to address amenity and compatibility considerations.</p> <p>The study has been amended to prohibit residential accommodation in these precincts.</p> <p>The height of the proposed building envelopes within this precinct has taken into consideration the potential impacts on the significant views from Old Government House and the Domain (Parramatta Park).</p>
47	Surrounding properties will have no privacy from adjoining high rise development. New dwellings will overlook the backyards of existing houses.	Detailed design of future development is required to provide appropriate amenity protection as required by SEPP 65 and assessment in accordance with Section 79C of the EPA Act 1979.
48	The feral cat, cockroach and rat populations will increase due to communal style living and the additional rubbish produced.	This contention is not agreed with.
49	The Draft DCP provides in 4.3.5.5, that variations to the ILP will only be considered where the amendment "would not significantly alter the planning outcomes...and where better outcomes can be demonstrated" and if these conditions cannot be met, council can then "condition the development consent" or request the applicant to demonstrate... the amendment of this plan is	The assessment power is granted to the consent authority under Section 79C of the EPA Act 1979 to determine the suitability of any future development application and to determine of the best planning outcome would be achieved assessed against the benchmarks set by the planning framework, including the Draft DCP.

	warranted". The definition of "better outcome" has not been clarified. This paragraph in the DCP highlights that there are no real safeguards in place for the preservation of the heritage.	
50	The DCP (4.3.5.10) refers to removal of two "high significance" buildings but does not state which ones they are. Further, "this is considered acceptable" again based on the notion of "pay-off" and "compromise" – that is, removal will "facilitate new development required to provide for the conservation..." The question remains, what independent authority considers this to be "acceptable"? Such an approach is not acceptable in a document intended to be a "guiding" reference for planning.	This is an error in the Draft DCP which has been updated. No high significance buildings are to be removed from the site.
51	The Draft DCP refers to page numbers in its "Contents" but in fact does not number each page and has all the appearance of a hastily compiled document in relation to content, other than the specific Lot details.	Page numbering has been refined in the Draft DCP.
52	Urban Growth NSW seeks to remove the statutory approval role of the Heritage Council by way of a 'draft tripartite Conservation Agreement among the Commonwealth, NSW Government and Parramatta City Council for the protection and conservation of World Heritage Values and National Heritage Values of the Australian Convict Sites, Old Government House and Domain, Parramatta Park'.	Any future development applications will be lodged and assessed under Part 4 of the EP&A Act. All heritage referrals and approvals required by any development application lodged in NSW will continue to apply.
53	Will there be restrictions on the colour and appearance of new buildings?	Prior to future precinct development, UGNSW has committed to prepare a Conservation Management Plan This further level of heritage assessment may identify further levels of heritage control if appropriate in the circumstance.
Heritage – Built (and General Heritage Items)		
54	Strongly opposes the use of a proposed State Significant Development Declaration to switch off	The project has been designated a State Significant Site not a State Significant Development. The Heritage Act will continue to apply and the Heritage Council will

	the Heritage Act and remove the Heritage Council as a determining authority for a development which impacts severely on a number of State Heritage Register Listings.	remain a consent authority in the Development Application process. Therefore, the proposal will be subject to the unfettered operation of the Heritage Act and the proper involvement of the NSW Heritage Council in the decision-making process will produce <i>a worthwhile development for the people of Parramatta, the State of New South Wales and the Australian Nation.</i>
55	Supports sensitive and appropriate development (primarily sensitive adaptive reuse) to provide for ongoing heritage conservation and presentation.	Noted.
56	Believes that the excessive development indicated in the concept drawings will become even more intensive given the past history in Parramatta of Section 75W applications to increase building heights.	Section 75W related to modifications to approvals under the now repealed Part 3A provisions of the EPA Act 1979. Section 75W does not apply to this proposal or future Development Applications.
57	Urges that the study area be extended eastward to take development pressures off the heritage areas and to preserve much needed open space for the increasing Parramatta population in coming decades.	The planning application is limited to the Government owned lands. Extending the “study area” eastward would require the State government to purchase this additional land in order to redevelop it with obvious attendant budget and program implications. The current proposal locates the development away from the heritage sites, allowing only minor additions to the heritage precincts. Parramatta City Council is proposing to investigate the rezoning of land east of the study area to allow increased development.
58	Strongly opposes new multi-storey buildings in the Female Factory.	<p>The proposed building envelopes within the former Female Factory/Lunatic Asylum Precinct and to the north of the main complex of the Norma Parker/Kamballa Precinct have been reduced in height and footprint to further minimise impacts on these historic areas. The revised ILP has removed buildings F8-3, F7-1, F8-2 and F8-5 and reduced building F7-2 from 6 storeys to 4 storeys</p> <p>These building envelopes retained in precinct F6 and F7 are for potential new structures required to implement an appropriate and sustainable new (non-residential) use for the significant buildings in these areas. There are no longer any proposed new buildings in Precinct F8.</p> <p>The level of development in this location has been significantly reduced.</p>
59	Urges the retention of the Central Male Block which is of “high significance”.	The Central Male Block is assessed to be of “high significance” in the 1998 CMP. However, the mid to late 19th century weatherboard Central Male Block was

		<p>demolished in 1934 and was replaced by the current brick buildings. These brick buildings are assessed to be of “moderate significance” in the 2010 CMP. The buildings of “high significance” within this precinct will be retained and conserved.</p>
60	<p>Urges that the development proposal have proper regard to the Conservation Management Plans prepared for the NSW Heritage Council in conjunction with the State Heritage Register Listings. The scale and quantity of development proposed is contrary to the policies of the Conservation Management Plans.</p>	<p>The overall strategy for the conservation of the site’s tangible and intangible heritage has been guided by all the previous Conservation Management Plans.</p> <p>The previous CMPs were prepared on the basis that the Cumberland Hospital and Norma Parker/Kamballa sites would be retained in the ownership of NSW Health/Corrective Services and therefore had limited guidance for redevelopment.</p> <p>The Conservation Management Plan undertaken to be prepared prior to any development will provide detailed heritage management guidance.</p> <p>The Aboriginal Archaeological and Cultural Heritage Management Plan, Conservation Management Plan, Tree Maintenance and Succession Planting Plan, Archaeological Management Strategy and Interpretation Strategy will provide development controls and guidelines that ensure that conservation (including maintenance) and interpretation of the heritage values within the Cumberland and Sports and Leisure precincts is co-ordinated.</p> <p>All future development will require the approval of the Heritage Council of New South Wales in addition to Parramatta City Council were the current legislative framework requires. Future proposals will need to identify and assess impacts on the heritage significance of the site—including buildings and structures, cultural landscape, Aboriginal cultural heritage and historical archaeology.</p> <p>The significance of the convict period buildings have previously been assessed as part of earlier heritage studies/CMPs for the former Female Factory/Parramatta Lunatic Asylum/Cumberland Hospital precinct and the Norma Parker/Kamballa Precinct.</p> <p>The convict period buildings of the former Female Factory/Parramatta Lunatic Asylum precinct and the significant buildings of the Norma Parker/Kamballa Precinct are to be retained in government ownership and will be subject to further assessment and more detailed recommendations for their ongoing management including guidelines for their adaptive reuse—these recommendations and</p>

		guidelines will form part of the <i>Conservation Management Plan</i> ,
61	Opposes the construction of a 6/16 storey building directly adjoining the Recreation Hall, Chapel and Parramatta Gaol.	Lot E3 contains the Recreation Hall/Chapel and two new buildings (6 and 16 storeys high). The landscaped curtilage of the Recreation Hall/Chapel was determined to provide a proper setting to the building and to protect the significant visual relationship with the oval and the Parramatta Gaol. The location and footprints of the new buildings are beyond the curtilage of the Recreation Hall/Chapel. Concern was raised regarding the location of the of the 16 storey building to the listed heritage items and heritage stone wall. The 16 storey building has been removed and now nominated as public open space area O/S5. The six storey building in the north of the precinct is now proposed to be an eight storey building.
62	Opposes the 4, 6 and 8 storey mixed use developments in Parramatta Park along Connell Street.	Lots SC and SD within the Parramatta Park site have already been developed. The location and footprints of the new buildings were determined after consideration of the World Heritage Site and to protect the significant views from OGH and Parramatta Park.
63	Seeks the close involvement of the Aboriginal Community in decision making regarding this project.	Refer to Section 4.3.5.8 in the DCP Report.
64	Opposes the demolition of the highly significant residence of the Chief Attendant, 9 Fleet Street.	The Chief Attendance's residence is assessed to be of "high significance" in the 1998 CMP. However, the building is not assessed to be of "high significance" in the 2004 CMP. It is assessed to be of "moderate significance". Although the building contributes to the ability to understand changing patient care and design philosophies associated with the Hospital for the Insane, its contribution is secondary to the key buildings from this phase—the Administration Block (to Mental Hospital), Female Ward No.7 (Admissions) and Male Ward No.7 (Mental Hospital Admissions Block).
65	Proposes the use of Wisteria Gardens for a major annual horticultural event along the lines of England's Chelsea Flower Show.	This is beyond the scope of this proposal.
66	The exhibited documents constantly seek to highlight the significant heritage in the Study Area but then, perversely, try to use that same significance as a justification for	Refer to Sections 4.3.5.8 to 4.3.5.11 in the DCP Report. The detailed proposals for accessing, interpreting and celebrating the tangible and intangible heritage of the site will be developed and submitted to the consent authorities for approval.

	overdevelopment. Despite all the references to heritage significance, the documentation contains no proposals for accessing, interpreting and celebrating that heritage	Interpretation of the heritage significance of the historic sites is one of the key elements of their conservation. Interpretation of the history and heritage significance of the historic sites is included in the rezoning submission as a State government commitment—see Item 4 of Attachment 17 to the Planning Report.
67	The proposed development will damage the World Heritage Listing prospects of the Female Factory. It is essential before proceeding, that the NSW government obtain written professional advice from the Australian Government and its Department of Environment, about what restrictions they believe are necessary to impose on the proposed development to ensure the development will not compromise the ability of the Parramatta Female Factory Precinct to gain National and World Heritage Listing status.	<p>There will be visual impacts but the proposed building envelopes in the ILP and draft DCP have been located to minimise the impacts on the former Female Factory/Parramatta Lunatic Asylum precinct as much as possible.</p> <p>Building height limits have been proposed for the O’Connell Street area of the Cumberland and Sports and Leisure precinct. The height of the proposed new building forms would result in some visual impacts on the generally low-scale (1-2 storey) character of the North Parramatta Conservation Area. However, the proposed building envelopes in the ILP and draft DCP have been located to minimise the impacts on the more significant areas including the former Female Factory/Parramatta Lunatic Asylum precinct and the Norma Parker/Kamballa precinct as much as possible.</p>
68	Building height limitations should be placed on O’Connell Street development so as not to detrimentally impact on the existing east side residential heritage areas and Conservation Zone. There are a total of 50 buildings individually named in the Local Environmental Plan 2011. 32 of which are State Heritage properties which contribute to the significance of the Parramatta Heritage and the other 18 have been recommended to be kept in their original conditions and no doubt will also become listed in due course.	<p>The consideration of the proposed built form along the O’Connell Street frontage of the site have been prepared having regard to the heritage of the area supported by specialist heritage advice. This advice has not identified a detrimental impact to heritage items in the vicinity. Further the concept has been prepared to provide the financial capacity to stabilise and retain the significant heritage of the PNUR study area.</p> <p>Building height limits have been proposed for the O’Connell Street area of the Sports and Leisure Precinct. The height of the proposed new building forms would result in some visual impacts on the generally low-scale (1-2 storey) character of the North Parramatta Conservation Area. This has been reinforced through the reduction in the building heights fronting O’Connell Street down from including 30 and 18 storey towers to having only 4 and 6 storey buildings opposite the North Parramata conservation area.</p>

69	<p>Scale and quantity of development is contrary to the principles provided in the Conservation Management Plans prepared for the NSW Heritage Council in conjunction with the State Heritage Register Listings. The process appears to have ignored the highly regarded Conservation Management Plan by Geoffrey Britton and Colleen Morris (1999).</p>	<p>There will be visual impacts but the proposed building envelopes in the ILP and draft DCP have been located to minimise impacts on the heritage significance of the Cumberland and Sports and Leisure precincts. The ILP as now revised has been endorsed by the NSW Heritage Council. In addition, a comprehensive Conservation Management Plan is being prepared for the site and will further detail building treatments, setbacks and other considerations to reduce the visual impact of the development.</p> <p>The ILP and draft DCP have taken into consideration the assessment and findings included in the <i>North Parramatta Government Sites Landscape Conservation Plan</i> prepared by Geoffrey Britton and Colleen Morris in 1999.</p> <p>There will be impacts but the proposed development envisaged in the ILP and draft DCP has been located to minimise impacts on the significant landscape values of the place as much as possible—refer to the assessment included in the <i>Parramatta North Urban Renewal Cultural Landscape Heritage Assessment</i>, prepared by Musecape.</p>
70	<p>The principles outlined in the 1998 North Parramatta Government Sites Conservation Management Plan prepared by the Department of Public Works and Services Heritage Group should be supported. The height and density of all structures should be recalculated consistent with the principles outlined in 1998 North Parramatta Government Sites Conservation Management Plan.</p>	<p>These CMPs assumed that the sites would remain in Health and Corrective Services ownership and were written to guide the conservation and maintenance of the buildings and landscapes rather than guide future development within the sites. The Conservation Management Plan undertaken to be prepared prior to any development will provide detailed heritage management guidance.</p> <p>The 1998 CMP was prepared on the basis that the Cumberland Hospital and Norma Parker/Kamballa sites would be retained in the ownership of NSW Health/Corrective Services and therefore had limited guidance for redevelopment.</p>
71	<p>All developments (irrespective of height or size) should be approved by the appropriate heritage authority that must consider any and all impact upon the heritage buildings, aspects and open spaces within the area. The applicant should be</p>	<p>Any future development applications will be lodged and assessed under Part 4 of the EP&A Act. All heritage referrals and approvals required by any development application lodged in NSW will continue to apply.</p> <p>The Parramatta Council Design Excellence Advisory Panel (DEAP), has not been</p>

	required to fund the full cost of any investigation prior to approval. The Parramatta City Council Design Excellence Advisory Panel should be reconsidered as the determining authority for heritage considerations as the panel may be limited in experience or not correctly focused on the issues under consideration.	identified as a determination body. The DEAP is a peer review body to assist Council in its assessment role to improve future development proposals.
72	In the draft Development Control Plan there is specific mention of the Parramatta Female Factory Precinct (PFFP) with respect to preserving Aboriginal heritage (many Aboriginal people were incarcerated there - sect 4.3.5.8 p.18), but in the following section on European culture and heritage there is no explicit mention of the PFFP buildings (p.19 sect 4.3.5.9) and their critical connection to non-Aboriginal people incarcerated there. There has been a National and NSW apology to such "Forgotten Australians", but it appears they have been forgotten again. This must be rectified.	Further heritage management plans and interpretation strategies have been undertaken to be prepared in recognition of the many layers of significance of the site from many groups.
73	There needs to be better assessment of the potential impact of the proposed development on the World and National Heritage values of Old Government House and the Governor's Domain to ensure these are not compromised, including in respect to curtilage and visual impact.	A detailed visual impact assessment of the views and vistas important to the World Heritage listing was undertaken (Attachment 8) to ensure significant impacts to these views have been avoided by the proposed built form controls. The <i>Parramatta North Urban Renewal Cultural Landscape Heritage Assessment</i> prepared by Musecape includes an assessment of the potential adverse impacts. Future development applications will need to address the potential impacts of a specific proposal on the World and National heritage values of Old Government House and the Domain.
74	A Conservation Management Plan for the convict buildings on the site must be put in place before development commences.	A Conservation Management Plan will be prepared by UGNSW prior to any development occurring and will provide detailed heritage management guidance.

		<p>The significant buildings of the former Female Factory/Parramatta Lunatic Asylum precinct (including those built by convicts) are to be retained in government ownership.</p> <p>The Conservation Management Plan will set out the further assessment and conservation document requirements for each building/area. The BHMS will be prepared in consultation with, and ultimately be endorsed by the Heritage Council of NSW.</p>
75	The precinct should obtain World Heritage status prior to any development.	Applying for World heritage status is not the intent of the study.
76	Upfront heritage building maintenance and protection is required.	<p>The Conservation Management Plan to be prepared by UGNSW will provide detailed heritage management guidance on building upgrade and maintenance.</p> <p>The State government will undertake a program of further investigation and conservation works.</p> <p>The significant areas of the Cumberland Hospital site and Norma Parker/Kamballa site and the Sports and Leisure Precinct are currently subject to the provisions of the <i>Heritage Act 1977</i> (NSW) and the heritage provisions of the Parramatta LEP. This will not change.</p>
77	Community Consultation sessions have not identified where money from the sale of the land will be used. There was no mention of conservation management; the whole procedure was focused on the building and sale of land.	The underlying objective of the proposal has been to identify opportunities to generate revenue to facilitate the conservation and management of the important heritage assets within the PNUR.
78	The extent of funding for heritage restoration has not been identified. It is not clear how the funding amount has been established.	<p>The Conservation Management Plan to be prepared will include detailed assessment of the condition of the heritage buildings to be retained and scope of works required. This level of assessment is required to determine cost involved in restoration works and mechanisms for these works to be undertaken.</p> <p>The cost estimates for the restoration of the significant buildings and structures</p>

		within the Cumberland and Sports and Leisure precincts have been based on precedents for restoration and repairs of similar buildings.
79	Despite all the references to heritage significance the documentation contains no proposals for accessing, interpreting and celebrating that heritage.	The retention and interpretation of the sites heritage is the fundamental element of the proposal that inculcates all levels of consideration of the future of the PNUR. UGNSW have undertaken to prepare management strategies of the sites built heritage, Aboriginal heritage and archaeological heritage, a heritage interpretation strategy and a public art strategy. All of these plans are proposed to support and celebrate the rich history of the site.
80	The proposed Clause 4.3.5.3 in the draft Development Control Plan (DCP) to restrict Design Excellence criteria to proposals of ten storeys or more is not supported. All buildings should be subjected to the Design Excellence requirements.	<p>The DCP has been amended to require proposals of five or more storeys to require consideration by the Design Excellence Advisory Panel.</p> <p>All proposed buildings 5 storeys and above will be subject to Council's Design Excellence Advisory Panel.</p> <p>The design of any new buildings within the former Female Factory/Parramatta Lunatic Asylum and Norma Parker/Kamballa precincts will be subject to the design controls and guidelines included in the <i>Conservation Management Plan</i> and will need approval from the Heritage Council of NSW and Parramatta Council.</p>
81	Specific conservation outcomes should be specified for all heritage items located within the precinct. Consultation should take place with organisations including the NSW Heritage Council, Office of Environment & Heritage, Commonwealth agencies, ICOMOS Australia and the NSW National Trust to compile clear guidelines for conservation works and compatible use.	<p>Consultation with the Heritage Council is ongoing as part of the Study process and will be supported by the preparation of management plans for the sites built heritage, Aboriginal heritage and archaeological heritage.</p> <p>The Aboriginal Archaeological and Cultural Heritage Management Plan, Conservation Management Plan, Tree Maintenance and Succession Planting Plan, Archaeological Management Strategy and Interpretation Strategy will provide development controls and guidelines that ensure that the significant heritage values (and elements) within the Cumberland and Sports and Leisure precincts are retained, protected and interpreted. These documents will be prepared in consultation with, and ultimately be endorsed by the Heritage Council of NSW.</p>
82	The various supporting management and strategy	These plans have not been fully developed as until the planning framework is

	plans (Aboriginal, Archaeological and Cultural, Built Heritage etc.) that are referred to in the DCP have not been developed. It is therefore not possible to fully assess the appropriateness of the control plans to satisfy the universally acknowledged need for sensitive reuse of the site.	established the final nature and extent of these management plans cannot be appropriately finalised. The concepts are however underpinned by detailed heritage consideration which confirm the sites significance on many level and provide guidance to the next level of management plans to be prepared prior to development being permitted on the site.
83	The Central Male Block has been stated as having “moderate” significance, meaning it will be demolished with plans to replace it with a “Village” commercial complex. This block, however, has been ranked of “high significance” by the 1998 Department of Public Works and Services Heritage Group North Parramatta Government Sites Conservation Management Plan and by the 2010 Perumal Murphy Alessi Conservation Management Plan 2010.	The two previous studies identified some elements of the former Central Male Block as being of High significance (in particular the day rooms and verandah) but also identified the 1930s replacement wards as being of Little or Moderate heritage significance only. The elements of High heritage significance will be retained, conserved and adaptively re-used consistent with design guidelines to be included in the <i>Conservation Management Plan</i> .
84	Why does the Female Factory site need rezoning?	The Female Factory site is not being rezoned. The land is already zoned B4 Mixed Use under Parramatta LEP 2011.
85	There needs to be an explicit reference to preserving the Parramatta Female Factory area, in particular in section 4.3.5.9 on European Cultural Landscapes of the draft DCP. It is clearly an area of deep historical importance both to women in the colony and to the development of workers and prisoner’s rights. Without an explicit reference to preserving the site it may be possible to grant approval to developments which compromise the integrity of the site.	The further heritage management and interpretation strategies committed to be undertaken will address these and many related heritage and interpretation issues.
86	Francis Greenway sandstone buildings to be retained and restored.	The historic buildings (or remnants thereof) designed by Francis Greenway are to be retained and conserved. They will also be retained in State government ownership.
87	Female Factory Precinct should contain no residential buildings.	The DCP and ILP have been revised to confirm no residential development or use in this precinct.

		Residential development is not proposed for within the former Female Factory/Parramatta Lunatic Asylum precinct—the proposed building envelopes shown in the ILP and the draft DCP are to accommodate supporting services/functions that would require unacceptable change to the significant buildings.
88	The so-called sensitive infill six storey building between the Female Factory Precinct and Roman Catholic Orphanage is unacceptable, as it blocks the critical sight line between the two. A commemorative community garden would be an acceptable alternative.	<p>The height and footprint of the proposed building envelopes between the former Female Factory/Parramatta Lunatic Asylum and the buildings of the former Roman Catholic Orphan School (Norma Parker/Kamballa) have been reduced to further minimise impacts. Building F7-1 has been deleted and Building F7-2 (renumbered F7-2) has been reduced in height from 6 storeys to 4. Building F8-3, F8-2 and F8-5 have all been deleted. There are no longer any new buildings proposed within precinct F8.</p> <p>The location and footprint of the proposed new building envelopes within these historic areas aim to guide future proposals—the final location, height and design details will be subject to a detailed master plan as set out in the planning proposal.</p> <p>The proposed building envelope to the south of Bethel House has been reduced down to only 2 new buildings instead of the originally proposed 4 new buildings to improve its setting.</p>
89	Heritage buildings require curtilage. This has not been addressed in the submission.	<p>The development of the ILP and draft DCP has taken into consideration the curtilages of the significant buildings within the Cumberland and Sports and Leisure precincts.</p> <p>There will be visual impacts but the proposed building envelopes in the ILP and draft DCP have been located to minimise impacts on the heritage significance of the historic sites including on views to and from significant buildings.</p> <p>Some adjustments have been made to the proposed new building envelopes south of Bethel House to ensure that impacts on its curtilage are minimised as much as possible.</p>

90	<p>Lot F8: F8---1, F8---2, F8---3 and F8 – 4 should not be built. The size in height and bulk completely dwarfs Bethel House diminishing its heritage characteristics and setting. F8 --- 5 should be reduced in height to 2 storeys and provided as a public amenities/community building. F8---1 and F8 ---2 block any chance of opening the site and providing some connectivity with the Sport & Leisure Precinct and further along the river the Riverside Theatres. As proposed, from a distance the wall of F8---1 will refute any suggestion that this area is open to the public. The current wooden and iron fence between the external wall and building 5 of the Orphanage should be removed to allow access to the other side of the Orphanage and the river as a means of providing pedestrian access.</p>	<p>Precinct F8: There are no longer any new buildings proposed in precinct F8</p> <p>Building F8-3, F8-2 and F8-5 have all been deleted.</p> <p>F8-1 (F8-5?) and F8-4 are now in Precinct F9 and set well away from Bethel House..</p> <p>All development within F7, F8 and F9 will be subject to the more detailed controls and guidelines contained in the <i>Conservation Management Plan</i>.</p> <p>Proposals for the adaptive re-use of the significant buildings of the former Roman Catholic Orphan School will look at a range of options to improve public access to and from the site and to create a physical connection with the Parramatta River.</p>
91	<p>Lot F7: F7---1 and F7---6 should not be built. F7---1 will obscure the view to the main section of the Orphanage. The placement and height of the 6 storey building completely dominates this area and overpowers the heritage building within it, and diminishes the view and importance of the clock tower attached to Ward 1 of the former Parramatta Asylum. The courtyard in which the buildings are proposed could be a location for a shaded garden given its mature trees and place for quiet contemplation, particularly in view of its history.</p>	<p>building F7- 1 has been deleted and building F7-2 reduced from 6 storeys to 4 storeys. Building F8-3 has been deleted also further opening up the foreshore interface being a positive response to the concerns raised.</p> <p>Development within this area is subject to further historical and archaeological research and assessment and detailed development guidelines to be included in the BHMS.</p> <p>The location and footprint of the proposed new building envelopes within these historic areas aim to guide future proposals—the final location, height and design details will be subject to a detailed master plan as set out in the planning proposal.</p> <p>The height and footprint of the proposed building envelopes between the former Female Factory/Parramatta Lunatic Asylum and the buildings of the former Roman Catholic Orphan School (Norma Parker/Kamballa) have been reduced to further minimise impacts. Building F7-1 has been deleted and Building F7-2 (renumbered F7-2) has been reduced in height from 6 storeys to 4.</p>

92	Lot F6: Building F6 should be sympathetically/historically designed to complement the heritage buildings, be for public use and restricted to 2 storeys.	F6: any future building will need to be designed for compatibility with its historic context and subject to the development controls and guidelines contained in the <i>Conservation Management Plan</i> . Any future building will not be for residential use but to accommodate the adaptive re-use of the significant buildings of the former Female Factory/Parramatta Lunatic Asylum precinct.
93	Lot F5: There is no adequate detail or justification provided for this 12 storey building. All buildings within this Lot should be reduced to 2 storeys.	There will be visual impacts but the proposed building envelopes in the ILP and draft DCP have been formulated to minimise impacts on the former Female Factory/Parramatta Lunatic Asylum precinct and Norma Parker/Kamballa Precinct as much as possible. This has included reducing the proposed 12 storey building to a 6 storey building in response to the heritage concerns raised.
94	Lot F4: Building F4---3 should be reduced in bulk, building F4 ---1 should be deleted to maximize open space and all buildings should be reduced in height to 2 storeys.	There will be visual impacts but the proposed building envelopes in the ILP and draft DCP have been formulated to minimise impacts on the former Female Factory/Parramatta Lunatic Asylum precinct and Norma Parker/Kamballa Precinct as much as possible.
95	Lot F3: UrbanGrowth NSW proposes to remove a heritage building where the ranking is contested and replace it with a commercial village centre to service primarily the new residents. If any building is developed here it should be outstanding as a world---class, national cultural facility accessible by all Australians, such as a Museum of Australian Sport that would tie in with the adjacent oval and its history. Again it is too early in the process to be so prescriptive as to the individual heights of this complex as outlined in the DCP as this restricts the type and creative design for such a facility. Nevertheless, in keeping with the associated heritage buildings, it should not exceed three storeys.	The Central Male Block is assessed to be of “high significance” in the 1998 CMP. However, the mid to late 19th century weatherboard Central Male Block was demolished in 1934 and was replaced by the current brick buildings. These brick buildings are assessed to be of “moderate significance” in the 2010 CMP. The buildings of “high significance” within this precinct will be retained and conserved.
96	Lot F2 & F1: Buildings should be restricted to 2 storeys.	The ILP has been amended to provide for the new building envelope wings in Precinct F1 and F2 as 2 storey elements consistent with the submission request.
	Lot E3: It is difficult to ascertain the rationale and none is provided behind proposing a 16 storey	The proposed building envelopes in the ILP and draft DCP have been formulated to

	<p>building that impacts directly on the boundary of the State Heritage Listed Parramatta Gaol, the Oval and Heritage building 75 (Recreation Hall and Chapel), as well as obscuring the view of Parramatta Gaol from opposite sides of the Oval. I note that TKD Architects Built Heritage Assessment recommends retention of the Gardener's Cottage within this Lot.</p>	<p>minimise the impacts on the former Female Factory/Parramatta Lunatic Asylum precinct and Norma Parker/Kamballa Precinct as much as possible.</p> <p>The landscaped curtilage of the Recreation Hall and Chapel was determined to provide a proper setting for the building and to protect the important visual relationship with the oval and Parramatta Gaol. The footprints of the proposed new buildings have been located beyond the curtilage boundary. The 16 storey building has been deleted and this location now proposed as open space.</p> <p>The former Gardener's Cottage is of moderate heritage significance. While retention of the building is preferred its demolition to facilitate the location of new development further away from the former Female Factory/Parramatta Lunatic Asylum precinct will help to minimise impacts on the more significant parts of the site.</p>
97	<p>Lot G1: I understood that stakeholders were keen on maintaining an open view into the study Area from Factory Street. The high bank of development proposed in this Lot completely isolates the precinct and obstructs what would be an enticing overview of the site and natural connection of the Cumberland Precinct with Parramatta Gaol. These buildings should be deleted.</p>	<p>There are currently no views into the site from along Factory Street or from along New Street. The ILP and draft DCP envisage re-instating the former extension of Factory Street into the site, which will also re-instate the historic view into the site and the north end of the former Female Factory/Parramatta Lunatic Asylum area.</p>
98	<p>G2: Like G 1, these buildings corrupt the view to the heritage buildings located in F6 & 7 and should be deleted.</p>	<p>There are currently no views into the site from along Fleet Street at this location. The ILP and draft DCP envisage re-instating the former extension of Factory Street into the site, which will also re-instate the historic view into the site and the north end of the former Female Factory/Parramatta Lunatic Asylum area</p>
99	<p>H 1-- 4: Development on the eastern side of Fleet Street can be achieved but I would submit that the setback of the buildings should be increased and those buildings immediately facing Fleet Street and the opposite Lots should be reduced in height to 3 storeys. I am unsure of the rationale for the 20 storey buildings and their location and the configuration generally of these Lots to comment further.</p>	<p>The proposed building envelopes in the ILP and draft DCP have been formulated to minimise the impacts on the former Female Factory/Parramatta Lunatic Asylum precinct and Norma Parker/Kamballa Precinct as much as possible.</p>

100	Lot B: These are enormous in size and height and it is difficult and pre-emptive to attempt to define with such exactness the location of buildings that about the Parramatta Gaol and land subject to aboriginal land claims without knowing the outcome and future of these neighbouring sites. And for this reason, the rezoning of this Lot should be deferred.	The ILP is a stand-alone outcome that does not rely upon the future development of other lands. There is no necessity to defer these precinct in this instance.
101	There is concern with Precinct F5 where the existing single-storey building is to be replaced by two six-storey buildings and an eight-storey building. An eight storey and two six storey buildings directly adjoining the Parramatta River will also impact on the views along the Parramatta River.	The proposed building envelopes in the ILP and draft DCP have been formulated to minimise the impacts on the former Female Factory/Parramatta Lunatic Asylum precinct and Norma Parker/Kamballa Precinct as much as possible.
102	There is concern with Precinct F5 where the present single-storey building is proposed to be replaced by a four- storey and a twelve storey building.	The proposed building envelopes in the ILP and draft DCP have been formulated to minimise the impacts on the former Female Factory/Parramatta Lunatic Asylum precinct and Norma Parker/Kamballa Precinct as much as possible. The proposed 12 storey building has been amended to now be a 6 storey building envelope.
103	There is concern with Precinct E3 where the single-storey Gardener's Cottage is proposed to be replaced by a 6-storey and a 16-storey building. The 16 storey building on this site is ill-conceived as it would be highly damaging to the setting of both the Recreation Hall and Chapel and Parramatta Gaol.	The proposed 16 storey building has been deleted and its location now proposed as open space. The remaining building envelope in precinct E3 has been increased from 6 storeys to 8 storeys.
104	There is opposition to the development of three new buildings (a six-storey, four-storey and three-storey building) within the 1803 Female Factory Precinct. New development within the Female Factory/Asylum Sub-precinct should be limited to the appropriate adaptive re-use of existing buildings. In particular construction of a six storey	Development within the former Female Factory/Parramatta Lunatic Asylum precinct is limited to the appropriate adaptive re-use of the significant buildings and structures. The building envelopes within the precinct are proposed to accommodate those functions and facilities that can't be accommodated within the more significant buildings without undertaking an inappropriate level of change. Development within this area is subject to further historical and archaeological

	building on the site of the 1838-1839 Gipps Female Cell Block and near the archaeological remains of the 1818 diversion of the first Mill Race for the Government Mill is considered untenable.	<p>research and assessment and detailed development guidelines to be included in the <i>Conservation Management Plan</i>. The location and footprint of the proposed new building envelopes within these historic areas aim to guide future proposals—the final location, height and design details will be subject to a detailed master plan as set out in the planning proposal.</p> <p>The height and footprint of the proposed building envelopes in F7 have been reduced to further minimise impacts. Building F7-1 has been deleted and Building F7-2 (re-numbered F7-1) has been reduced in height from 6 storeys to 4.</p>
105	The hospital landscape should be placed under a custodian who will ensure its long term survival and provide for its long term maintenance, conservation and presentation.	The areas proposed to be zoned as RE1 Public Open space will be dedicated to Parramatta City Council.
106	The 6-storey and 4-storey mixed-use development along O'Connell Street, south of the Victoria Road intersection has a massive footprint. This development is not only within Parramatta Park but located within the 'Highly Sensitive' area of the World Heritage Site and would be visible from many parts of the World Heritage Area. A "mixed-use" development would surely not be an appropriate use within a 'Sport and Recreation' Precinct. Similarly the 8-storey mixed use development north of Victoria Street on O'Connell Street is subject to the same important heritage constraints as above. The proposed developments in O'Connell Street should be relocated outside the 'Highly Sensitive' zone of the World Heritage Site.	<p>The height and footprint of the proposed new building envelopes along O'Connell Street have been determined by the need to avoid significant impacts on the identified significant views from Old Government House and the Domain. While development in this area is within the zone designated as a 'Highly Sensitive' area with regards to OGH and the Domain and would be visible from within the World Heritage Area it would not result in significant impacts on the values of OGH and the Domain.</p> <p>The planning proposal is limited to State owned lands. Relocating the proposed buildings to other areas of the Sports and Leisure precinct or the Cumberland precinct would increase the potential for impacts on other, more significant parts of these two precincts.</p> <p>Residential development is proposed to be prohibited from these four precincts.</p>
Heritage – Landscape (including View Analysis)		
107	The Precinct has a strong history as a botanical landscape and there is inadequate assessment of the impact on trees, tree loss and future tree requirements from the extent of excavation needed for basement car parking.	<p>UGNSW have undertaken to prepare a tree maintenance and succession planting plan to manage the transition of the sites vegetation and to manage the tree canopy across the site.</p> <p>The proposed site layout and building footprints envisaged in the ILP and draft</p>

		DCP have been formulated to retain as many of the significant historic trees as possible—refer to the findings of the PNUR Cultural Landscape Assessment.
108	Draft DCP controls are insufficient and poorly articulated. The clause "if possible" needs to be deleted where a desired future outcome is actually required. The document does not give public confidence that detail conservation for the sensitive heritage landscape, instead LEP planning controls are recommended that regulate the landscape design for increased setback, identifies all existing trees, landscape elements on lot diagrams and details ground level interface between the many private / public / heritage item interactions.	UGNSW have undertaken to prepare heritage management plans and a tree maintenance and succession planting plan. These are additional levels of protection and assessment that will support the future use and protection of the sites heritage.
109	It is imperative that the heritage 'Bunya' pines within the female factory are retained.	It is proposed that the 'heritage Bunya Pines' within the former Female Factory precinct will be retained and subject to ongoing care and maintenance.
110	New bridge crossing over the river will impact on important views.	<p>Any proposals for change, including upgrades to transport and road infrastructure will need to consider the potential impacts on the significant heritage values of the place including fabric, spaces, elements and views.</p> <p>All proposals will need an IDA approval, which will include approval by the Heritage Council of NSW as required under the <i>Heritage Act 1977</i> (NSW).</p> <p>No new bridge crossing is proposed.</p>
111	Although the site line to Parramatta Park is acknowledged the one from the gates site to Factory Street is not, even though this is indicted as a second entry point for future plans. High density residential development between fleet and O'Connell are contrary to intention to recognize these site lines. This would impact on building height between Fleet Street and O'Connell Street – not more than 4 stories on Fleet and rising only in relation to historic views.	The proposed building envelopes in the ILP and draft DCP have been formulated to minimise the impacts on the former Female Factory/Parramatta Lunatic Asylum precinct and Norma Parker/Kamballa Precinct as much as possible.

112	The views assessment by Musescape does not take into account the fact that vegetation is not a static element. The impact on significant views to and from World Heritage Listed Old Government House and Domain should consider the impact when vegetation dies and does not provide the same amount of screening as currently exists.	UGNSW have undertaken to prepare a tree maintenance and succession planting plan to manage the transition of the sites vegetation and to manage the tree canopy across the site, with the intent being to manage and augment the tree canopy on he site.
113	Photomontage Technique - Figure 51 is taken from the top of a set of stairs. Stepping down just six steps would produce a completely different view with a ridgeline of tower.	The view assessment has been undertaken based upon a previous assessment by Planisphere which has been the basis of the tripartite agreement between all three levels of government relating to the World heritage listing of Old government House.
114	Photomontage Technique - Figure 59 existing buildings can be seen clearly from the northern edge of the Park. However this image is taken so close to the river that they are all obscured.	The view assessment has been undertaken based upon a previous assessment by Planisphere which has been the basis of the tripartite agreement between all three levels of government relating to the World heritage listing of Old government House.
115	Photomontage Technique - Other images are taken from totally wrong locations. For example, Figure 47 is taken from behind Old Government House instead of inside the tree line overlooking The Crescent. Figure 48 is taken on the road behind Old Government House instead of on the ridge line at the middle of The Crescent.	The view assessment has been undertaken based upon a previous assessment by Planisphere which has been the basis of the tripartite agreement between all three levels of government relating to the World heritage listing of Old government House.
116	Photomontage Technique - In Figure 57 the view angle is approximately 160 degrees but the image shows only approx. 90 degrees. The northern edges of this view would clearly take in taller developments. Figure 64 is a north-east view (not north) and Figure 65 is again a north-east view not northwest.	The view assessment has been undertaken based upon a previous assessment by Planisphere which has been the basis of the tripartite agreement between all three levels of government relating to the World heritage listing of Old government House.
117	Photomontage Technique - The number of sight lines looking into the Cumberland and Sports and Leisure Precincts are very limited indeed and consequently do not show any views with a high level of impact, with the exception of Figures 68 and 72.	The view assessment has been undertaken based upon a previous assessment by Planisphere which has been the basis of the tripartite agreement between all three levels of government relating to the World heritage listing of Old government House.

118	Photomontage Technique - The photomontages should be independently reviewed and presented in manner that overcomes the shortfalls outlined above.	The view assessment has been reviewed in relation to the concerns raised and the conclusion reached in the assessment remain valid.
Heritage – Aboriginal		
119	The proposal does not adequately address Aboriginal heritage, cultural and landscape perspectives and therefore further involvement of the Aboriginal community in decision making regarding this project be undertaken.	<p>Undertaking 1 at Attachment 17 includes the preparation of an Aboriginal Archaeological and Cultural Heritage Management Plan which includes further research and consultation with the Aboriginal community.</p> <p>The planning proposal has responded to the Aboriginal and cultural landscape values of the historic sites—refer to <i>the PNUR Aboriginal Archaeological and Cultural Heritage Assessment</i> prepared by Comber Consulting. The report includes recommendations for further research and assessment including further consultation with the Aboriginal community consistent with the OEH requirements—<i>Aboriginal cultural heritage consultation requirements for proponents 2010</i>.</p> <p>Refer also to Section 4.3.5.8 in the DCP report.</p>
120	Aboriginal and European archaeology potential must be explored in partnership with an appropriate institution.	<p>Undertaking 1 at Attachment 17 includes the preparation of an Aboriginal Archaeological and Cultural Heritage Management Plan which includes further research and consultation with the Aboriginal community.</p> <p>The Aboriginal archaeological potential will be managed in consultation with the NSW Office of Environment and Heritage. The process will set out in the <i>Aboriginal Archaeological and Cultural Heritage Management Plan</i>.</p> <p>The European (Historical) archaeological potential will be managed in close consultation with the Heritage Division, OEH. The process will be set out in the <i>Archaeological Management Strategy</i>.</p>
121	Aboriginal heritage values must be fully protected in accordance with the recommendations of the Aboriginal Heritage report.	Undertaking 1 at Attachment 17 includes the preparation of an Aboriginal Archaeological and Cultural Heritage Management Plan which includes further research and consultation with the Aboriginal community.

		The proposed <i>Aboriginal Archaeological and Cultural Heritage Management Plan</i> will provide guidance for future development to ensure that Aboriginal heritage values are retained and appropriately managed.
Heritage – European Archaeology		
122	The significance of the Factory as a heritage site and tourist attraction for Parramatta and New South Wales is well covered in the assessments of Aboriginal Heritage, the European Archaeology, the Built Heritage, and the Social Significance already before the NSW Department of Planning and Infrastructure. But the wider significance of the site has not yet been addressed. Historians who have researched the history of convictism and convict women within the context of Australia's national story have a vital contribution to make to the preparation and execution of the management strategy that will oversee the development of this site.	<p>Noted and reference is made to undertakings 2 and 3 of Attachment 17 relating to the preparation of built heritage and archaeological management plans prior to development occurring. Also of relevance is undertaking 4 at Attachment 17 for the preparation of a heritage interpretation strategy.</p> <p>The history and heritage significance of the study area is to be interpreted within the context of the wider Parramatta area and its many other significant places.</p> <p>The historical information to be included in the interpretation media will be based on existing and future historical research to be undertaken by historians of appropriate levels of knowledge of the development of Parramatta and the convict experience.</p>
Community Services		
123	Local schools are already at a high level of occupancy with very limited capacity for expansion. The proposed development will place increased demand on these schools. Consideration should be given to a new school within the site boundaries.	The provision of or augmentation of existing education facilities are matters actively being considered by Education and Communities having regard to population growth broadly.
124	The nearest Fire Station (Northmead) has been closed, site sold and relocated. The proposed development will place increased demand on fire and emergency services.	Emergency services have not raised capacity issues with the ability to service future development in the PNUR area.
125	Provision of community services such as, childcare, jobs and public transport is not outlined in the proposal.	The B4 Mixed use zoning permits and encourages a diversity of land uses including employment. The many heritage buildings on site a readily adaptable heritage re-use for employment generating community or child care purposes.

126	<p>The plans as exhibited do not give adequate consideration to likely social impacts and the accompanying need for additional community facilities and services. A rezoning of this size should include a social impact assessment. (Statement on s94 contributions is not a satisfactory approach).</p>	<p>The PNUR study proposes amendment to the planning framework to permit the revitalisation of the site. The revitalisation includes significant provision of transport upgrades, both in terms of intersection upgrades and provision of an extensive pedestrian cycleway network and the embellishment and dedication of open space to Parramatta Council. These tangible works are underpinned by the protection and retention of significant heritage buildings and places which could be adapted for a range of community uses.</p> <p>In relation to the potential Section 94 A contributions, money collected from future works by Council will be in addition to any development contemplated when these plans were formulated and at between 1-3% of the cost of works will represent a significant financial windfall for Council to allocate to projects they may wish to pursue.</p>
Traffic and Transport		
127	<p>Urges that parking considerations be dealt with up-front before any rezoning is contemplated so the public is presented with the full implications of the development proposal.</p>	<p>Parking considerations have been included in the determination of building footprints. Early site investigations will provide greater certainty regarding geotechnical and archaeological constraints. Some podium car parking is envisaged. The provision of parking will need to accord with Councils development control plan.</p>
128	<p>The parking within the proposed rezoned area will be a problem due to Parramatta City Council's existing parking policy in the surrounding area, the loss of parking in Parramatta Park, extra residents and commercial usage and doubling the population of the area based upon latest Census information.</p>	<p>Parking impacts and considerations and options to mitigate these impacts have been addressed in the transport assessment lodged with the study at Attachment 3. The provision of parking on the site will need to accord with Councils development control plan</p>
129	<p>Road upgrades parking provisions for tourists and visitors have not been considered.</p>	<p>Road infrastructure upgrades and impacts have been addressed in the transport assessment lodged with the study at Attachment 3.</p>
130	<p>Parking is problematic for local residents, especially on game day at the stadium. Consideration should be given to creating streets as traffic calming devices in themselves. (One-way, narrow roads with broad verges, especially</p>	<p>The road hierarchy underpinning the ILP road layout, include traffic calming with appropriate road widths, has been identified but will depend upon the intended role of the new street.</p>

	around the retail area to encourage al fresco style restaurants).	
131	Encourage public transport by bringing light rail through the precinct.	Light rail running through the PNUR would be supported by UGNSW. The final routes and location will be a decision for Transport for NSW.
132	The car usage rates adopted in the traffic and transport study are not supported. Every household has at least 2 cars and depending upon the age of people and number of people living there it could be more.	Statistics do not support that every household has two cars. The traffic generation rates have been based upon data from similar sites (including sites in Parramatta) which has been endorsed by RMS.
133	The plans indicate that vehicles from this development will enter and leave from both O'Connell and Albert Streets. Roads and Maritime Authority previously deemed these roads as unable to cope with vehicle from a proposed 91 unit development.	In order to address existing pinch points in the road network, a number of road infrastructure upgrades will be necessary in order that the road network can accommodate the additional traffic.
134	The Draft DCP refers to "Access and Parking" in its contents which refers to the Development Lot Controls and in each of these, there is only shaded areas referring to "Potential Underground Parking" and "Potential Above Ground Parking". Excavation depth for underground parking is unknown and the possibility of above ground parking may mean that developers keen on maximizing their yield may not wish to sacrifice floor space yield and use Section 75W to lodge an Application to increase the buildings' heights. Again, such matters must be fully considered before rezoning so that the public is made fully aware of the potential impacts on the site and adjacent heritage assets.	<p>The building heights proposed are a statutory maximum. If future developments propose to utilise above ground building envelope for car parking that will be a financial decision at that stage but will not justify increases in building heights which have been carefully considered having regard to the numerous considerations for the site, particularly heritage.</p> <p>As previously noted Section 75W relates to projects under the now repealed Part 3A provisions of the EPA Act 1979 and do not apply to this proposal.</p>
135	With the use of Bridge Road as a connective route into the Westmead Precinct and suburbs beyond, (anticipated in its Plan for the Future), the Study Area has the potential to become a heavily trafficked route into other areas of the Parramatta	The existing connection is currently controlled by boom gates to limit traffic flow between the subject site and Westmead. This proposal does not include an upgrade to the existing bridge or a new road connection to Westmead. Should such links be considered in the future, the traffic impacts of such proposals would appropriately require consideration at that time.

	CBD. This will negatively impact what fauna remains and atmosphere of the precinct as portrayed in various artists' impressions supporting this proposal.	
136	The exhibited documents omitted the proposed bridge over Darling Mills Creek to the north that is necessary for residents to access the development. This bridge gave the impression that there was less pressure and crowding of the heritage sites than is actually planned.	No new bridge connection is proposed.
Infrastructure and Flooding		
137	Further investigation of overland flood paths should occur.	Future Development Applications will be prepared and assessed against Parramatta Council's flood risk management policies and requirements.
138	Water quality in Parramatta River is already of concern and the run-off during development and subsequent stress on the river system with the addition of 4,100 new residents would cause further pollution to an already stressed waterway.	Future Development Applications will be prepared and assessed against Parramatta Council's Water quality and quantity requirements.
139	The documentation makes no reference to on-site parking provisions and likely constraints from archaeology and probable high water tables near the Parramatta River. It is anticipated that construction of major underground car parking in situations where nationally significant archaeology occurs and where high water tables may be present would prove very costly and in some instances, the car parking may have to be integrated into the buildings' design.	Parking considerations have been included in the determination of the proposed building footprints and envelopes. Early site investigations will provide greater certainty regarding geotechnical and archaeological constraints that apply within each precinct. Some podium car parking is envisaged.
140	Sustainability requirements fail to go beyond the minimum requirements. This is a lost opportunity given the size of the precinct.	The study has been prepared in response to sustainability targets that are applicable. The future development will be required to respond to legislative and policy changes as they evolve over the life of the project.
Site Contamination		
141	The available information does not detail the full	The site will be remediated if necessary to ensure compliance with the

	extent of the various environmental hazards and pollution such as asbestos, fuel, pesticides and other chemicals (such as lead and arsenic) that have been extensively been used over the proposed redevelopment site. Any development must carry the cost of all required work.	requirements of SEPP 55.
Public Consultation and Statutory Exhibition		
142	Detailed site visits should have been made available to members of the public.	The study was exhibited in accordance with the requirements of the Department of Planning and Environment.
143	The UrbanGrowth lead drop-in sessions during the statutory exhibition period lacked detail and substance.	The drop in sessions were in addition to the public exhibition and followed on from engagement forums leading up to the development of the study and the concepts for the PNUR area.
144	The information presented was too detailed for the public to be able to review and comprehend.	The level of detail provided and lodged was in accordance with the requirements of the Department of Planning and Environment.
145	A longer period of public exhibition and consultation must be provided for future development proposals than was made for this stage. The statutory exhibition period for this rezoning application was too short to allow for information to be understood and responded to.	Future Development Applications will be lodged and notified in accordance with the policies and requirements of Parramatta Council.
146	The proposal should have been better publicised, including to interest groups outside the Parramatta area due to the State and National significance of the Parramatta Female Factory Precinct, and world-wide in the case of Old Government House and the Governor's Domain.	The study was exhibited by the Department of Planning and Environment in accordance with their policies.
147	There has been no truly public consultation process with the public as a whole. A resident of the area did not receive any directed written notification regarding the sale or development of this area.	The study was exhibited by the Department of Planning and Environment in accordance with their policies.

148	Stakeholder charrettes appear to have been steered towards obtaining acceptance of key industry development concerns such as de-risking the land and providing planning certainty, while not addressing wider stakeholder concerns.	The stakeholder consultations leading to the preparation of the study included community groups, agencies and Council.
149	Public exhibition in the lead up to Christmas deterred submissions.	The study was exhibited by the Department of Planning and Environment in accordance with their policies.
150	Community drop-in sessions were conducted during the exhibition period at a time when some members of the public were unable to attend.	The study was exhibited by the Department of Planning and Environment in accordance with their policies.
Staging and Implementation		
151	Provision of improved public transport for the area, including a light rail network and dedicated cycle ways, and restoration and enhancement of all heritage buildings must be early completion priorities of the project.	The provision of light rail is a proposal being separately considered by Transport for NSW. The provision of light rail to the PNUR area would be an outcome supported by UGNSW. The ILP include cycleways, and restoration of significant heritage buildings and places.
152	It is unclear what upfront funding is going to be provided for protection and security of the entire site during the development stage. At the moment security seems to be non-existent and it can only get worst over the next 20 years of development.	The <i>PNUR Built Heritage Assessment</i> includes some adaptive re-use guidelines. These guidelines will form the basis for more detailed site-specific guidelines in the PNUT Conservation Management Plan and Precinct Specific Policies, which will be developed in consultation with the Heritage Division, OEH and be endorsed by the Heritage Council of NSW. These will be co-ordinated by UGNSW for implementation in their role of managing the land on behalf of NSW Government
153	It is not clear how upgrades to the public domain, including access along the river foreshore, will be delivered, including staging.	The <i>PNUR Built Heritage Assessment</i> includes some adaptive re-use guidelines. These guidelines will form the basis for more detailed site-specific guidelines in the PNUT Conservation Management Plan and Precinct Specific Policies, which will be developed in consultation with the Heritage Division, OEH and be endorsed by the Heritage Council of NSW.
154	Noise impacts on existing residents during construction have not been considered.	Future development and construction will be subject of conditions of development consent and construction management plans to be imposed by Council as conditions of development consent.
155	A project of this size is likely to have long	Future construction will be subject to the hours of operation mandated by Council

	construction hours, 7 days per week, with construction traffic impacting local roads.	as conditions of development consent.
156	There is a potential threat of air borne asbestos fibre and risk of dust disease once demolition of buildings commences.	Remediation and removal of hazardous materials should this be required will be undertaken in accordance with the relevant regulatory framework and work practices.
Management and Governance		
157	Urges a continuing integrated precinct management of the whole site by a single government agency to ensure the long term survival, co-ordinated maintenance, conservation and presentation of this state and nationally significant cultural landscape. Management of 'fragmented' parts of the site by new apartment dwellers' body corporates, lessees of individual buildings or individual clusters of buildings would be highly detrimental to the long term conservation of the Heritage Listed Precincts.	The former Female Factory/Parramatta Lunatic Asylum precinct and the Norma Parker/Kamballa precinct are to be retained in government ownership.
158	Neither the Parramatta Park Trust, nor the State Government appear to have complied with the existing provisions regulating the usage and size of the Park. The proposal to allow alternative uses for those sites to the east of the river and bounded by O'Connell St fail to comply with a requirement that the Park be use for the "promoting the health and recreation of the inhabitants of the Town of Parramatta" .	The Sports and leisure precinct will continue to support and provide recreation and entertainment opportunities for the community.
159	There is no need for this project to be cost neutral in the short term, especially as its tourism value could return profits in the medium term. Other significant historic heritage sites are funded from the public purse and this site should be publicly funded too.	The project is effectively being subsidised by the public. The development has sought to minimise this subsidy in recognition of the significance of many of the buildings and places to the heritage of NSW.
160	Tourism should be investigated as a future use for the site.	The proposal does not preclude heritage opportunities for the site and would be a desirable outcome for the site.
161	Public land should not be sold off to enable	This has been the approach to date which has not delivered a viable management

	refurbishment of the heritage buildings. This should be publicly funded.	or protection of the buildings and places. The proposal seeks to generate revenue to meaningfully protect the significant buildings and places and seek their adaptive re-use.
162	A public trust should be established to safeguard the heritage significance of the site.	A policy decision of NSW Government has been made to pursue the renewal of the area to provide for the protection and adaptive re-use of the significant buildings as the means to ensure their long term survival and appreciation.
163	The adaptive re-use of heritage buildings must be in full consultation and hopefully agreement with the community and relevant interest groups including those previously involved in the consultation process.	<p>The adaptive re-use of the significant buildings on the Cumberland Hospital and Norma Parker/Kamballa sites will require approval from the Heritage Council of NSW and Parramatta City Council.</p> <p>The BHMS will include more detailed adaptive re-use guidelines that will also be endorsed by the Heritage Council of NSW. The BHMS will be developed in consultation with, and be endorsed by, the Heritage Council of NSW.</p> <p>Community groups and other relevant interest groups will have an opportunity to comment on any proposals for adaptive re-use as part of the IDA process.</p>
164	The focus of the study is on government owned land only. Generally the land on the western side of O'Connell Street is identified for redevelopment to heights ranging from 16 metres to 96 metres. However land on the eastern side remains limited to 9 metres. There is no justification for this. The study area should have extended beyond only government owned land.	The study has been limited to government owned land only. The investigation of the land to the east of the study area is a process currently being explored by Parramatta Council.
165	No account is taken of cumulative impacts of the very reasonable renewal of other parts of North Parramatta (such as privately owned land) with the focus of the study being on the government land only. The ability to renew private land may be restricted by the development of the government land.	The study has been limited to government owned land only. The investigation of the land to the east of the study area is a process currently being explored by Parramatta Council.
166	The buildings and lands should be made accessible to the public. Possible public and	The renewal will significantly open the site to the public with open space access, new roads and cycle paths. The retention of the B4 Mixed Use zoning ensures that

	community uses include: meeting halls, galleries, museums, performance spaces, artist's studios, and children's playgrounds. These facilities should be available to non-profit community groups on a concessional basis, and hired out for profit-making ventures for an appropriate fee.	a wide diversity of land use can be pursued within the PNUR area.
167	Government should continue to occupy the buildings as offices with any necessary renovations which do not damage the historical value of the buildings.	Government occupation of some of the buildings is not precluded by the study.
168	An overseeing body should be appointed to maintain and extend the process of the appropriate restoration and utilisation of the entirety of the precincts. The managing body should be governed by a board which includes specialist historians and other representatives from historical societies including the Heritage Councils of NSW and of Australia.	A policy decision of NSW Government has been made to pursue the renewal of the area to provide for the protection and adaptive re-use of the significant buildings as the means to ensure their long term survival and appreciation.
169	The plans that were exhibited are incomplete in that they only deal with part of the Parramatta North Urban Renewal area. For example, the Gaol and Old Kings School were excluded.	The study area is limited to government owned lands and deliberately excluded the Gaol due to the pending land claim.
170	A multi-use community centre available for a wide range of community activities would also help foster a village atmosphere. This would be a good role for one of the larger historical buildings on the site upon restoration.	The study does not preclude this as an outcome for the adaptive re-use of the retained heritage buildings.
171	The site should not be sold for profit.	A policy decision of NSW Government has been made to pursue the renewal of the area to provide for the protection and adaptive re-use of the significant buildings as the means to ensure their long term survival and appreciation.
172	It is refreshing that the policy framework includes the needs for a significant portion of 3 and 3+ bedroom units. While the current market may demand mostly two bedroom units, if Parramatta	Comment noted

	North is to be a “community for the future” it must accommodate more than just what the current market demands.	
173	All four precincts identified in the proposal include scope for arts and cultural use, particularly cultural production and presentation spaces in both the Cumberland and Old Kings School Precincts. An arts focus for the Old Kings School Precinct would be welcomed.	Comment noted, and clarified that the study does not include the Old Kings School site.
174	The re-zoning in the Sports Precinct raises uncertainty about the continued continuity of the current land ownership by Parramatta Park Trust.	The study has been amended to preclude residential uses in the Sports and Leisure Precinct. The study does not stipulate or govern future land ownership.
175	Parramatta Public Pool should not be demolished. The proposal to relocate the swimming centre complex should be rejected in favour of onsite upgrading with surrounding building heights significantly reduced, especially on the northern side of the pool.	The pool is not proposed to be demolished.
176	The sale of public land and consequent residential and commercial development of the Study Area lacks sufficient rationale, particularly in light of the significant opportunities for rezoning and redevelopment elsewhere in the Parramatta LGA and Metropolitan West Central & North West Subregion.	There will be visual impacts but the proposed building envelopes in the ILP and draft DCP have been located to minimise impacts on the heritage significance of the historic sites.
177	Documents such as the Draft Amendment to Parramatta Development Control Plan 2011 (DCP) are detailed in relation to built form and height, however, no such detail is provided in relation to the ownership, management and adaptive re-use envisaged for the heritage buildings.	<p>The significant buildings of the former Female Factory/Parramatta Lunatic Asylum precinct and the Norma Parker/Kamballa precinct are to be retained in government ownership.</p> <p><i>The Aboriginal Archaeological and Cultural Heritage Management Plan, Conservation Management Plans, Tree Maintenance and Succession Planting Plan, Archaeological Management Strategy and Interpretation Strategy</i> will provide development controls and guidelines that ensure that the significant heritage values within the Cumberland and Sports and Leisure precincts are retained, protected and interpreted. These documents will be prepared in consultation with, and</p>

		ultimately be endorsed by the Heritage Council of NSW.
178	UrbanGrowth does not appear to have followed its 'City Transformation Life Cycle' described as a "new global methodology for the urban transformation of cities". [Ref from UGNSW website and material from the Bays Summit.]	The management of the project will be undertaken in accordance with UGNSW policies and procedures.
179	There is no indication of the future use or management of the area subject to an Aboriginal Land Claim, or how this area would be integrated into the proposal. This area is not subject to the controls that are being proposed for the remainder of the Cumberland Precinct and with this current uncertainty it is difficult to accept that planning changes can be formalized while this area is still under consideration.	The study does not include the Aboriginal land claim area. The ILP does not rely upon the development of this area and is able to be pursued independent of the land subject to the claim.
180	It is unclear what will happen to the nursing homes in the area.	Any nursing home accommodation will continue to be managed in accordance with the statutory obligations of the operators regarding the security of tenure of the occupants.
181	There is an exceptional level of development proposed within the Study Area. From the consultative phase of the plans development the explanation offered for such densities was to meet the demands of a predetermined property yield of 4,000 residential units, which has no identifiable link to the funding required for permanent conservation of the heritage within the three State Heritage Register listed areas. The height and density of all structures be recalculated consistent with the number required to fund the required permanent conservation of the heritage within the area.	<p>The Conservation Management Plan to be prepared will include detailed assessment of the condition of the heritage buildings to be retained and scope of works required. This level of assessment is required to determine cost involved in restoration works and mechanisms for these works to be undertaken.</p> <p>The cost estimates for the restoration of the significant buildings and structures within the Cumberland and Sports and Leisure precincts have been based on precedents for restoration and repairs of similar buildings.</p>
182	Affordable housing must be included in the proposal. Heritage is not accepted as a constraint to the provision of affordable housing. As the	Precincts H3 and H5 are owned by Land and Housing Corporation, and will have significant up lift and revenue potential to be directed towards social and affordable housing opportunities.

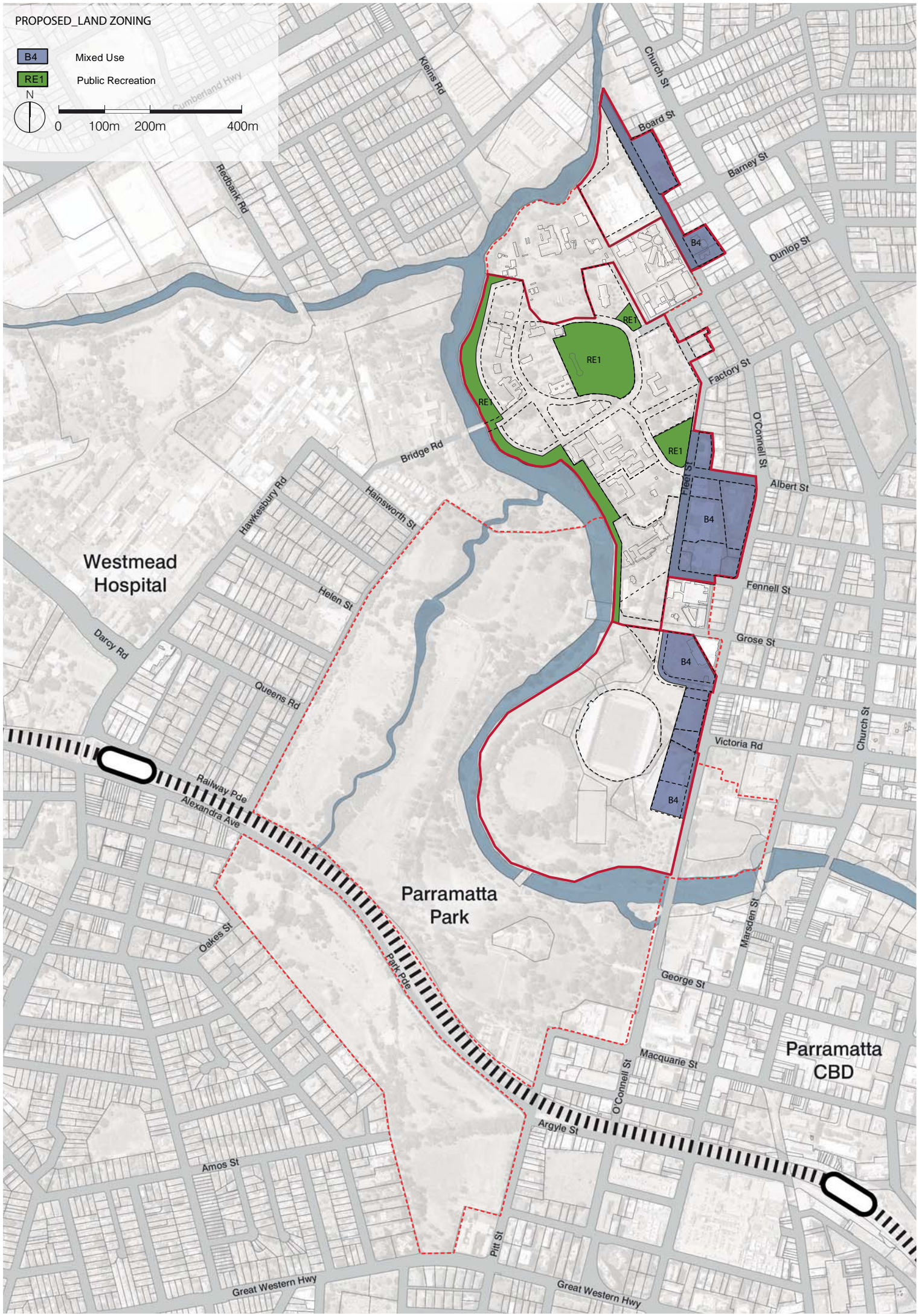
	project area is heritage listed it should obtain funds from the State budget.	
183	The public display of the proposals had a significant omission; the planned construction of 2000+ more units on the Parramatta Goal and former site of the Female Division of the Parramatta Lunatic Asylum currently subject to an Aboriginal Land Claim.	The study does not include the Parramatta Gaol land.
184	There is no tangible plan for any of the heritage buildings, except for a vague notion that the heritage precincts could be opened up for tourism, commercial or arts use. These vague ideas were said to have a potential cost of hundreds of millions of dollars. How could there be any idea of potential costs when there is no firm idea of potential future uses? It seems clear that it is in fact an exercise in asset realisation grossly excessive to the needs of the heritage precinct's preservation and future conservation. It is entirely possible that the precincts will be asset realised and no resources made available at all for the future of the heritage buildings.	<p>The Conservation Management Plan to be prepared will include detailed assessment of the condition of the heritage buildings to be retained and scope of works required. This level of assessment is required to determine cost involved in restoration works and mechanisms for these works to be undertaken.</p> <p>The cost estimates for the restoration of the significant buildings and structures within the Cumberland and Sports and Leisure precincts have been based on precedents for restoration and repairs of similar buildings.</p>
185	The Sports Precinct appears to have accepted that the stadium will remain. There is no consideration of moving the stadium to a location more appropriate to its future transport and development needs; nor consideration to returning the site to its original use as part of Parramatta Park. The proposed re-zoning lock in this facility to this site, with no option for future re-location. The same issue exist with the League's Club; again, future options to return this land to Parramatta Park are lost. If accepting the proposal that these facilities remain, the plan provides no solution to parking needs for the	The relocation of the stadium was not part of the study brief. The development opportunities for precincts SA, SB, SC and SD encourage car parking options to remove the current surface parking.

	parklands, pool, stadium and club.	
NSW Health		
186	Any development near Cumberland Hospital should be respectful of the dignity and privacy of the patients. It should also be mindful of the safety and peace of mind of the public, especially children.	Comment noted
187	Land and buildings that are no longer required for Health purposes should be transferred to another government body, such as a Trust that is responsible for maintaining the buildings and conserving the heritage values, until new uses can be determined.	The most significant buildings, including those from the former Female Factory/Parramatta Lunatic Asylum precinct and Norma Parker/Kamballa Precinct are to be retained in ownership by the State Government.
188	NSW Health Properties Branch must be relieved of the responsibility to sell public land and assets to support the Health budget. This is an anachronism that should no longer apply in NSW.	Comment noted
189	The impact on existing hospital uses and mental health services needs to be outlined.	The study does not propose any works. The study seeks to amend the planning framework to provide renewal opportunities to protect and conserve the significant heritage places. This may include NSW Health continuing to occupy buildings in the PNUR area.
190	There is no clear plan for relocation of Health functions and no timeframe nor staging plan.	The study does not propose any works. The study seeks to amend the planning framework to provide renewal opportunities to protect and conserve the significant heritage places. This may include NSW Health continuing to occupy buildings in the PNUR area.
191	With timeline of 15-20 years, a broader Regional consideration including whole of Department of Health complexes at Westmead and Cumberland ought to be included instead of restriction to two precincts.	Comment noted.

Attachment 2: Revised Draft LEP maps

PROPOSED LAND ZONING

- B4** Mixed Use
- RE1** Public Recreation



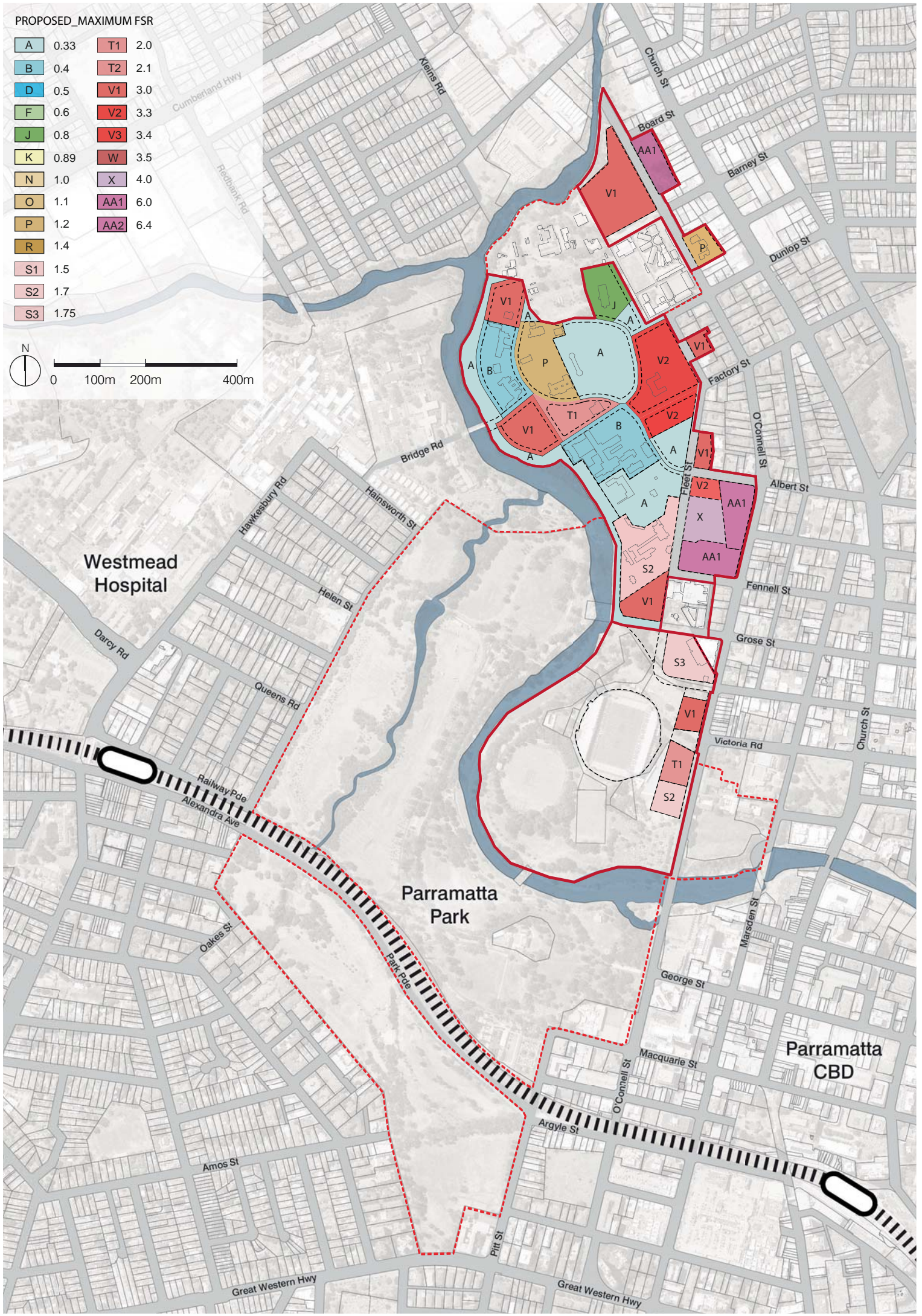
Westmead Hospital

Parramatta Park

Parramatta CBD

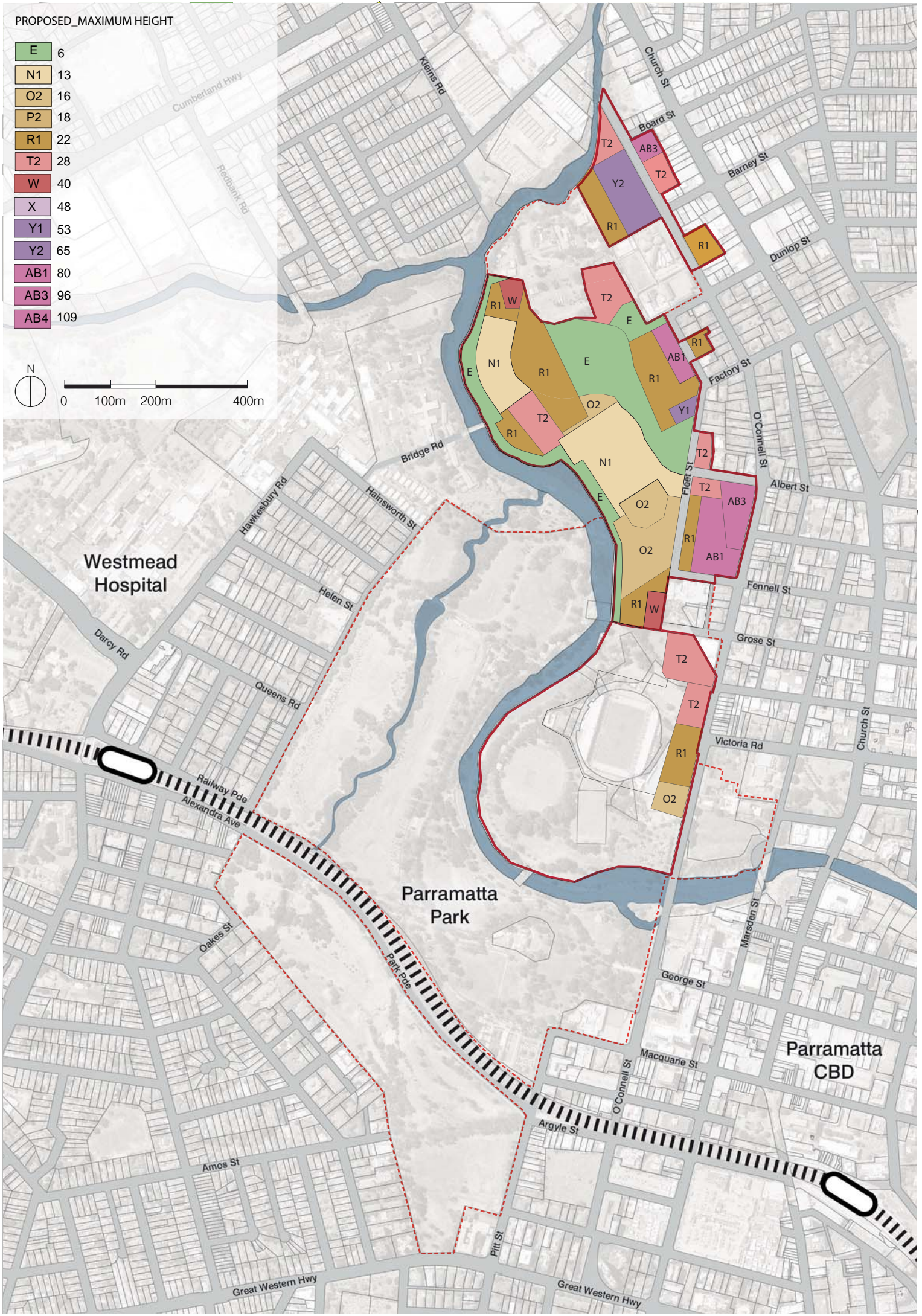
PROPOSED_MAXIMUM FSR

A	0.33	T1	2.0
B	0.4	T2	2.1
D	0.5	V1	3.0
F	0.6	V2	3.3
J	0.8	V3	3.4
K	0.89	W	3.5
N	1.0	X	4.0
O	1.1	AA1	6.0
P	1.2	AA2	6.4
R	1.4		
S1	1.5		
S2	1.7		
S3	1.75		



PROPOSED_MAXIMUM HEIGHT

E	6
N1	13
O2	16
P2	18
R1	22
T2	28
W	40
X	48
Y1	53
Y2	65
AB1	80
AB3	96
AB4	109



Attachment 3: Revised Schedule of Actions for UGNSW as Government coordinator – 14 April 2015

UrbanGrowth NSW commits on behalf of the NSW Government to undertake these tasks and investigations subject to approval of the planning framework and approval of the Treasury business case and Cabinet approval.

Item no.	Undertaking	Timing/threshold
Archaeology and Heritage		
1	Prepare an Aboriginal Archaeological and Cultural Heritage Management Plan (AACHMP) that includes: <ul style="list-style-type: none"> • further research • an updated history • targeted geotechnical testing • further consultation with the Aboriginal community in accordance with the Office of Environment & Heritage's (OEH) Aboriginal cultural heritage consultation requirements for proponents 2010. 	Prior to commencement of physical works lot release.
2	Prepare a Conservation Management Plan for the PNU and a specific Conservation Management Plan for each of the development Precincts to establish how the significant buildings and structures will be managed and appropriate adaptive re-use accommodated.	Prior to approval of the master subdivision and infrastructure DA.
3	Prepare an archaeology management strategy for archaeology. This will require further archaeological testing and a review of statements of significance for the archaeology within the precincts using current assessment guidelines. The archaeological testing will be preceded by: <ul style="list-style-type: none"> • Preparation of an Archaeological Research Design. • Obtaining of a s60 Heritage Act 1977 approval and National Parks and Wildlife Act 1974 to allow for disturbance of any Aboriginal objects. 	Prior to development lot release.
4	Preparation of a Heritage Interpretation Strategy.	Prior to development lot release.
5	Preparation of a Public Art Strategy.	Prior to development lot release.
6	Prepare a tree maintenance and succession planting plan (canopy renewal plan)	Prior to development lot release.
Environmental Site Works		
7	Preparation of required contamination studies as part of the master superlot subdivision and infrastructure Development Application.	As part of the master subdivision Development Application.
Intersection upgrades and Traffic Management measures		
8	During the development of this TMAP road and intersection capacities will be assessed against the final rezoning yield, the strategic initiatives now being promoted by Transport	Following publication of the Parramatta North Urban Transformation SEPP, UrbanGrowth NSW undertakes to commence a TMAP process in partnership

Item no.	Undertaking	Timing/threshold
	for New South Wales and in accordance with RMS Guide to Traffic Generating Developments (2002). This assessment will investigate the upgrade of roads, intersections, public transport and cycle facilities, along with the appropriate timeline for their implementation to a Level of Service D unless otherwise mutually agreed to.	with Transport for NSW.
Public Domain works and upgrades		
9	Coordination of any applications and implementation of open space upgrade and embellishment.	As demand arises to facilitate the release of development lots.
10	Coordination of any applications and implementation of new road construction.	As demand arises to facilitate the release of development lots.
11	Coordination of any applications and implementation of pedestrian/cycleways	As demand arises to facilitate the release of development lots.
12	Coordination of any applications and implementation of public domain improvements such as playground equipment	As demand arises to facilitate the release of development lots.
Fauna Management		
13	Finalise and implement the Ecological Management Plan for the Grey Headed Flying Fox camp	Prior to development lot release.
External Infrastructure Servicing works		
14	Potable water infrastructure upgrades	As demand arises to facilitate the release of development lots.
15	Waste water infrastructure upgrades	As demand arises to facilitate the release of development lots.
16	Electricity feeder upgrade works	As demand arises to facilitate the release of development lots.
Site Infrastructure works		
17	Potable water and waste water reticulation	As demand arises to facilitate the release of development lots.
18	Service trenching	As demand arises to facilitate the release of development lots.
19	Stormwater management upgrades	As demand arises to facilitate the release of development lots.
20	Communication infrastructure provision	As demand arises to facilitate the release of development lots.
Affordable Housing		
21	Affordable housing in the Parramatta North Urban Transformation area is to be provided at a rate of 3% of the total development yield.	Throughout the life of the project.

Attachment 4:SEPP 65 Design Statement

MEMORANDUM

ARCHITECTURE
URBAN DESIGN
HERITAGE
INTERIORS
GRAPHICS

POST COURIER BY HAND EMAIL

From: Michael Heenan **Date:** 9/06/2015
Project: Parramatta North Urban Renewal **Project No:** 13031
To: SJB Planning
Address: Level 2, 490 Crown Street, Surry Hills NSW 2010 Australia
Attn: Scott Barwick, Associate Director **Page 1 of 1**
Cc: Ryan Beelitz, Pat Coleman

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& NOMINATED
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ALLEN JACK+COTTIER
Architects Pty Ltd
ABN 53 003 782 250

Scott

In response to your request please find a summary of how the ILP 15F has been developed with regard to SEPP 65.

ILP 15F has been prepared according to the principles of the SEPP 65 RFDC.

The envelope configurations have been prepared to maximise the ability of future detailed designs to achieve the relevant amenity requirements of SEPP65.

The design team has considered the following:

- Building separation
- Floor to floor heights
- Deep soil guidance
- Building orientation
- Build depth

Solar access has been based on the assumption that the design should meet the provisions for 2 hours at mid-winter for apartments. No detailed testing has been undertaken on the indicative blocks, as this would be undertaken the DA stage.

Regards

Michael Heenan

CEO, Principal, Design
ALLEN JACK+COTTIER

Attachment 5:Heritage Impact Assessment Addendum

10th June 2015



Urban Growth NSW
PO Box 237
Parramatta NSW 2124

Attention: Pat Coleman, Assistant Development Director

Dear Pat,

SUBJECT: PARRAMATTA NORTH URBAN RENEWAL PROJECT
TKDA JOB NO: 13 0932
RE: REVIEW OF REVISED INDICATIVE LAYOUT PLAN REV 15F

We have reviewed the Indicative Layout Plan Rev 15F which has been prepared in response to the public and authorities submissions and provide this overview of the potential heritage impacts of the changes to Lots A1, B, E3, F2, F3, F5, F7, F8, F9, G1 and G2.

Changes to ILP		Heritage Impacts
A1	Proposed 30 storey building footprint revised to be a part 30 and part 12 storey building Proposed 4 storey wing has been removed. Proposed 4 storey building has been increased in height 8 storeys centrally in the block.	The increased height is a direct result of the reduction of new development within the curtilages of the significant buildings adjacent to the Parramatta River. The inclusion of this Lot within the Parramatta Gaol SHR listing is a drafting anomaly to be corrected by application to the Heritage Council of NSW. The changes in the height and disposition of the buildings within this Lot will not result in a negative heritage impact on significant views of Parramatta Gaol or its curtilage provided that the design guidelines provided that the design guidelines as set out in the planning proposal are followed.
B	B-6 has been relocated away from the existing perimeter stone walls	This is a positive heritage outcome because the sandstone walls will not be impacted by the new development (building and the underground car parking).
E3	E3-1 increased in height from 6 to 8 storeys Deletion of building E3-2	The changes in the height and disposition of the buildings within this Lot will not result in a negative heritage impact. This is a positive heritage outcome retaining the visual relationship between the Parramatta Gaol and the Cumberland Hospital and providing and enhanced landscape setting for the Recreation Hall/Chapel.
F2	Extensions F2-1, F2-2, F2-3 and F2-4 reduced in height from 3 to 2 storeys	This is a positive heritage outcome with the extensions to the heritage buildings immediately adjacent to the Parramatta River being no higher than 2 storeys.
F3	Reconfiguration of contiguous buildings F3-1, F3-2, F3-3 and F3-4 and the removal of the mid 20 th century additions to building CH 65 (Male Hospital and Day Rooms)	This is a positive heritage outcome with the footprint of this new building having an improved relationship and set-backs to the existing heritage buildings CH 59, 60, 63, 65 and 66. The removal of the later addition to building CH 65 allows for the retention and conservation of original c1890s wing.
F5	Proposed 12 storey building reduced to 6 storeys and footprint of 4 storey wing reconfigured	This is a positive heritage outcome with the buildings adjacent to the Parramatta River and the core heritage buildings being no higher than 8 storeys.

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Principals Alex Kibble, Robert Denton, Megan Jones, John Rose | Practice Directors George Phillips, Jocelyn Jackson

Senior Associates Ian Burgher, Angelo Casado, David Earp, Emma Lee, Scott MacArthur | Team Leader, Interior Design Melanie Mackenzie

Associates Paul Dyson, Renata Ratcliffe, Lachlan Rowe

NSW Nominated Architects Robert Denton Registration No 5782 | Alex Kibble Registration No 6015

Changes to ILP		Heritage Impacts
F7	Deletion of building F7-1 F7-2 (now F7-1) reduced in height from 6 to 3 storeys	This is a positive heritage outcome. The proposed four storey building envelope is intended as infill development to support appropriate new uses within the significant buildings of the former Female Factory and Parramatta Lunatic Asylum complex. The final use, location, height and design details will be subject to a detailed master plan as set out in the planning proposal.
F8/F9	New Lot – set back from F8 increased and building footprints changed Deletion of buildings F8-2, F8-3 and F8-5	The separation of the new development from the significant buildings of the Norma Parker/Kamballa Precinct, the increased curtilage to Bethel House and the re-orienting of the new development is a positive heritage outcome. The development of this Lot will not result in a negative heritage impact on significant views of the Norma Parker/Kamballa Precinct or its curtilage provided that the design guidelines as set out in the planning proposal are followed.
G1	G1-6 increased in height from 6 to 8 storeys	This increased height is a direct result of the reduction of new development within the curtilages of the most significant buildings adjacent to the Parramatta River. An increase in height of one building within this Lot will not result in a negative heritage impact on significant views or the curtilage of the Nurses Home No. 2 provided that the design guidelines provided that the design guidelines as set out in the planning proposal are followed.
G2	Reconfiguration and expansion of Lot G2, and reconfiguration and expansion of footprint of buildings G2-1 and G2-2. Building G2-1 increased in height from 14 to 16 storeys	This increased density is a direct result of the reduction of new development within the curtilages of the most significant buildings adjacent to the Parramatta River and the deletion of building E3-2. The new development fronting Fleet Street replaces earlier non-significant buildings. The detailed design of the development of this Lot will be required to ensure that it does not result in a negative heritage impact on Building CH 112 and the entry gardens.

Please do not hesitate to contact either Megan Jones or Sean Williams to discuss any of the above.

Yours sincerely,

TANNER KIBBLE DENTON ARCHITECTS PTY LTD



Megan Jones
Practice Director
NSW Registration No: 4148
QLD Registration No: 4357

