



**CITY OF
PARRAMATTA**

North-East Planning Investigation Area Draft Planning Strategy

Community Engagement Report

April 2024



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1. Introduction

1.1. Purpose of this Report

This Community Engagement Report has been prepared to summarise and respond to themes raised in feedback received during the public exhibition of the draft North-East Parramatta Investigation Area Planning Strategy (Planning Strategy).

The Engagement Report is an attachment to a report for the Parramatta Local Planning Panel (LPP) seeking their advice on amendments to the planning controls for the North-East Planning Investigation Area (NEPIA). At the time of writing, this report was scheduled for the LPP meeting on 16 April 2024. The Engagement Report is also an attachment to a Council report on the same proposed planning amendments scheduled for 13 May 2024 at the time of writing.

1.2. Background

On 9 November 2020, Council resolved to endorse a draft Planning Strategy for the purposes of public exhibition to seek feedback from the community and stakeholders on six built form options for the NEPIA presented in the Planning Strategy.

The draft Planning Strategy for the NEPIA was exhibited for 31 days in 2021 commencing on March 16 and ending on 15 April as part of a non-statutory exhibition process. The six built-form options are summarised in **Table 1** below. A webpage link to the Planning Strategy is [here](#).

Since this time the Department of Planning, Housing and Industry (the Department) led a review of planning controls in the wider area of North Parramatta. This work was finalised in December 2023 with the State Environmental Planning Policy (Church Street North Precinct) 2023 ('CSN SEPP') being made. A webpage link to the CSN SEPP is [here](#).

The changes to the planning controls by the Department for the Church Street North Precinct did not include the NEPIA; however, in the [Department's Finalisation Report](#) to the CSN SEPP opportunity for the NEPIA to provide a transition in scale from the higher density tower forms from the Church Street North Spine to the lower density dwellings in the Sorrell Street Heritage Conservation Area (HCA) to the east was recognised.

Table 1: The Floor Space Ratio's and building heights of the six (6) built form options in the exhibited draft Planning Strategy for the NEPIA

Option	Building height	Maximum Height achievable with Design Excellence	Floor space ratio (FSR)
Option 1 'No change'	11m (as per current height in <i>PLEP 2023*</i>)	N/A	0.8:1 (as per current FSR in <i>PLEP 2023*</i>)
Option 2	28m (8 storeys)	N/A	2:1
Option 3	40m (12 storeys)	46m (14 storeys)	3:1 plus Design Excellence
Option 4	54m (17 storeys)	62.1m (20 storeys)	4:1 plus Design Excellence
Option 5	67m (20 storeys)	77.1m (23 storeys)	5:1 plus Design Excellence
Option 6	80m (25 storeys)	92m (29 storeys)	6:1 plus Design Excellence

Note. When the Planning Strategy was being exhibited, the relevant planning instrument was Parramatta LEP 2011. This has now been superseded by Parramatta LEP 2023 (LEP); but the LEP and FSR controls for the NEPIA did not change.

2. How did we consult?

The Planning Strategy was exhibited for a four-week period from 16 March to 15 April 2021. Whilst there is no statutory requirement under the *Environmental Planning and Assessment Act 1979* and *Environmental Planning Regulations 2021* to exhibit a Planning Strategy, its exhibition is consistent with the community participation requirements contained in Council's Community Engagement Strategy.

2.1. Engagement mechanisms

The following community engagement mechanisms were utilised for the purposes of the exhibition of the Planning Strategy consistent with the resolution of Council (weblink available [here](#)).

- Notification letters to landowners and occupiers (including owners and occupiers of individual apartments within strata buildings) inside the NEPIA boundary and landowners and occupiers within a 200m buffer of the NEPIA boundary.
- Participate Parramatta [webpage](#).
- Exhibition material included:
 - Frequently Asked Questions
 - Draft Planning Strategy
 - Community Flyer
 - Background documents:
 - Council Report 9 November 2020;
 - Council Resolution of 9 November 2020;
 - Corresponding Heritage Study (2015) by Urbis;
 - Corresponding Heritage Study of Interface Areas (2017) by Hector Abraham Architects
 - Peer Review of Heritage Interface Area (2018) by GML
 - NEPIA - Map
 - Video comprising a narrated slideshow on the project website
 - Hard copy of exhibition documents made available at Council's Customer Service Centre and Parramatta Library
- Online submission portal.
- Project email address to receive submissions.
- Consultation with Council's Heritage Advisory Committee.
- Consultation with relevant public authorities, including the (then) Department of Planning, Industry and Environment (DPIE), Transport for NSW and the NSW Heritage Office
- Public notice on City of Parramatta's corporate website and Participate Parramatta portal.
- Phone-a-planner sessions during the period of exhibition.

3. Feedback from the exhibition of the Planning Strategy

A total of **194 submissions** were received during the exhibition period which was received via the project email address or the online submission portal.

Submitters fall into one of the following categories:

- **Landowners, Residents and Individuals:** 181 submissions which represents 93.3% of the total submissions received. Of the 181 submissions, 111 submissions came from residents within the Parramatta LGA which represents 94% of the total submissions received.
- **Planning Consultants on behalf landowners:** 5 Submissions which represents 2.6% of the total submissions received.
- **Public Authorities, Institutions and Interest Groups:** 8 Submissions which represents 4.1% of the total submissions received, from Heritage NSW, Transport for NSW, School Infrastructure NSW, Parramatta Female Factory Friends, North Parramatta Residents Action Group, National Trust of Australia, Parramatta Heritage Advisory Committee and Urban Taskforce.

As the proposed LEP and DCP amendment progresses (as detailed in the LPP and Council Report), the community, stakeholders and public agencies that provided submissions on the draft Planning Strategy will again be consulted. Consultation will be undertaken in accordance with the requirements of the *Environmental Planning and Assessment Act 1979* and *Environmental Planning Regulations 2021* as well as with the community participation requirements contained in Council's Community Engagement Strategy and any conditions of a Gateway determination issued by the Department (should Council resolve to seek this).

The feedback received during the public exhibition period for the Planning Strategy in 2021 is provided to ensure there is a complete record of the consultation; and to show how the feedback has informed the recommended planning controls in the Planning Proposal, DCP and Council Report, as well as the changing planning position.

4. Review of submissions

4.1. Overview of submissions

The preferred option from nearly half of respondents (46.1%) indicated support for option 1 which is that no change should occur to the existing planning controls. This means maintaining the current 11 metre building height (3 storeys) and 0.8:1 FSR.

The second most preferred option representing 16% of respondents was for option 6 which proposed an 80 metre building height and a 6:1 FSR (excluding a design excellence bonus).

24.7% of respondents did not explicitly indicate a preference for any of the six (6) options presented in the Planning Strategy. However, these respondents indirectly indicated their preference in their written comments.

- 13.9% of respondents were concerned at the introduction of “high density residential flat building development” into the area. The current zoning for the NEPIA in the LEP is R4 High Density Residential and the controls permit three storey residential flat buildings. Therefore, it is assumed that these submitters preference lies with option 1 ‘No change to the existing controls’.
- 2% of respondents indicated a preference for high-rise development. Since options 2 to 6 include higher density forms (ie greater than 3 storeys), it is assumed that these submitters’ preferences lie with options 2 to 6.
- 8.8% of respondents did not provide sufficient commentary for Council Officers to ascertain a preferred option or option range.

Table 2: Summary of submissions on preferred option

Preferred Option	Number of submitters	Percentage
Option 1 - ‘No change’	94	46.1%
Option 2	17	8.3%
Option 3	6	2.9%
Option 4	1	0.5%
Option 5	4	2.0%
Option 6	34	16.7%
Not Indicated	48	23.5%
Total	204	100%

Note: The total number of preferred options (204) exceeds the number of submissions received (194) due to some submitters expressing their support for more than one option.

4.2. Key themes identified in the feedback

Respondents concerned at the high-rise density options (who leaned towards options 1 or 2) tended to raise issues which cover the following themes:

- Heritage, overshadowing and character
- Scale & density
- Local infrastructure
- Traffic and parking and public transport
- Environmental

Respondents supporting the high-rise density options (who leaned towards option 6 as well as options 2 to 5) tended to raise issues which cover the following themes:

- Development feasibility and design quality
- Previous resolved position of Council

4.3. Examination of key themes and Council Officer responses

Detailed discussion of these themes and a response is provided below. This response includes a comment about how the recommended new draft controls seek to address each theme. The draft controls are detailed in Attachments 1 and 2 of the LPP and Council reports (see Section 1.1 above).

1. Heritage, overshadowing and character

Seventy-six submissions (76) out of the ninety-four (94) that supported option 1 expressed concern with the built form options and the potential impact on heritage. These submissions raised concerns that related to bulk, scale and density in that high-rise buildings would negatively impact the adjoining heritage areas. Submitters also raised concerns that high-rise buildings would overshadow heritage sites and the HCA. The retention of the heritage character as a defining aesthetic factor was a key reason for support for option 1.

Submitters also shared concerns with high-rise development forms being incompatible with the character of surrounding area and the potential for tall buildings to overtake the current environmental context of the NEPIA. These notions were categorised under loss of character.

Transitioning down in height from the higher-density built form in Church Street North to the Sorrell Street HCA was suggested by some submitters.

Alternative views to the above were expressed from respondents supporting the higher density options. These views came from both residents and a planning consultant. For instance, some submitters were of the view that the area's heritage could be retained through the careful use of materials, interface treatments, setbacks and appropriate transitions from towers to heritage areas/items. Additionally, a planning consultancy representing seven (7) landowners within the NEPIA argued that a 'hard' transition from tall towers to low scale heritage sites would emphasise and reinforce the heritage precinct.

In its submission, Heritage NSW saw that any new planning controls for the NEPIA *considers the protection of the cultural significance and heritage values of state and locally listed heritage items and the locally listed Sorrell Street HCA.*

Council Officer response: The Department's Finalisation Report for the CSN SEPP included principles and strategies for responding to the adjoining HCAs and low scale residential uses by transitioning building heights downwards towards them and protecting view corridors. The recommended height controls for the NEPIA in the LPP and Council Reports are based on the 'viewshed' approach detailed in the consultant study commissioned by the Department (refer to Section 1.2 of the [Church Street North Urban Design Study](#), p. 60). This design approach is to protect the setting of Sorrell Street Heritage Conservation Area.

The principle of transition is also recommended to be applied to 'space' between buildings through setbacks, building separation and orientation. Orientating the short edge of towers towards the HCA and requiring vegetated seeks to minimise the bulk of towers perceived from the HCA and provide landscape space as a frame/backdrop to heritage buildings and the HCA. Maximising separation between towers where it can increase views to sky when observed from the HCA and encouraging slender tower forms and finer grain street wall typologies to tie into the surrounding lower scale context of North Parramatta also aim to achieve a transition and unify development across the precinct. The proposed DCP controls (Attachment 2 to the Local Planning Panel Report) requires new development consider overshadowing with specific reference to impacts on the adjacent Sorrell Street HCA (e.g. proposed control **C.04** in **Section 8.3.10.6**). The Department discusses alternative controls as part of the CSN SEPP in contrast to the CBD Planning Proposal's controls to limit the impacts of overshadowing on surrounding heritage sites.

Mitigation of overshadowing impacts are also proposed to be addressed through design principles established for the CSN SEPP via stepped building heights, space between buildings through setbacks and building separation. The draft DCP controls for the NEPIA

define how the Church Street North Precinct design principles will be upheld.

Controls related to heritage relationships and transition can be found in **Section 8.3.10.6** of Attachment 2 to the Local Planning Panel Report, the draft amendments to the Parramatta DCP 2023.

2. Scale and density

Impacts on heritage, overshadowing and loss of character from the scale and density were key concerns respondents that supported maintaining the current controls were concerned that the attractiveness and values of North Parramatta would be affected negatively by larger scale and more dense development, particularly around:

- Visual impacts and liveability
- Sorrell Street's "charm"
- Increase overshadowing impacts on both North Parramatta and Sorrell Street HCAs
- Impact on street trees (lack of space for plantings and overshadowing)
- Impacts on heritage with strong contrasts between the zones
- Incompatibility with the surrounding area

These submitters also shared a desire to maintain the unique quietness and existing amenity of the precinct in line with low-scale density provided by the existing built environment. However, supporters of the higher density options, including option 6 saw higher densities aligning with the principles of growth for the area's proximity to the City Centre.

Council Officer response: See above response to '1. Heritage, overshadowing and character'.

3. Local infrastructure

Some submitters were concerned that overdevelopment of the area with high-rise buildings would place unreasonable demands on local infrastructure, particularly open space areas and parks, schools and sports facilities.

Transport for NSW suggests in its submission that Council could amend its Local Infrastructure Contributions Plan by including public work improvements to existing active transport paths, connections and crossing facilities to encourage use of active transport modes.

Council Officer response: New development will be subject to the 'Outside CBD s7.11 Development Contributions Plan 2021 – Amendment No.1'. This will provide for the capacity to fund more local infrastructure in accordance with the Community Strategic Plan (CSP), ensuring the community continues to be serviced by infrastructure which supports the intended growth. New development resulting from the recommended planning controls will also make use of State infrastructure including the Parramatta Light Rail and Sydney Metro. With regards to school infrastructure, Schools Infrastructure NSW's submission of April 2021 expressed concerns on the potential impacts on the operation of Parramatta North Public School, Bayanami Public, Northmead Creative and Performing Arts High School from the proposed options, particularly the high-rise options and the potential population increases. It proposed additional consultation be undertaken prior to finalisation of the draft Strategy. Schools Infrastructure will be consulted on the Planning Proposal (if endorsed by Council).

4. Traffic and parking and public transport

Traffic was raised as an issue, predominantly from residents within the NEPIA with any increases in

density being perceived to compound the effect of traffic and parking issues that exist in the area.

However, supporters of the higher density options (including option 6) see the State Government's investment in transport infrastructure in the area, such as Sydney Metro and the Parramatta Light Rail, being aligned with the higher density options. Reference was also made in some submissions to a site-specific proposal in Harold Street proposing at that time a maximum height of 80 metres and an FSR of 6:1. These submitters were of the view that these controls could be applied across the NEPIA as a logical and viable future for the precinct and owing to the area's proximity to the Parramatta Light Rail and Sydney Metro rail system.

A number of respondents (approximately 11% of total respondents) were of the view that because the NEPIA has proximity to the Parramatta Light Rail, this was sufficient justification for increases to densities in the range of Options 3 to 6.

As a principle, Transport for NSW supports high density development that has proximity to public transport. However, Transport for NSW recommends transport impact assessment be undertaken prior to the finalisation of the Planning Strategy to identify the potential impacts to the traffic and transport network from the proposed built form options (1 – 6), including the ability of the adjacent networks to adequately accommodate the trip demand of the built forms and identify any potential negative impacts to the light rail journey time along Church Street.

Council Officer response: In May 2021, after the exhibition of the Planning Strategy, the Department took over the planning process for the Church Street North Precinct. As part of that process, the Department undertook its own consultation with key State agencies and other parties including Transport for NSW, some 18 months after Council received Transport for NSW's submission on the Planning Strategy. It means that the currency of Transport for NSW's submission on the Planning Strategy may be somewhat outdated. This process led to the forthcoming CSN SEPP which will introduce new LEP controls for the Church Street spine and as described above the Department's view of the NEPIA being a transition between the higher density on Church Street and the HCA's low scale residential areas.

The Department's Finalisation Report for the CSN SEPP also states, *In light of the evolving housing crisis...the department has...prepared a rezoning to provide certainty and accelerate housing delivery along the Parramatta Light Rail corridor* (p. 4).

The NEPIA is generally subject to the same traffic conditions as the Church Street North Precinct and its proximity to existing public transport makes use of State infrastructure, services and facilities in the City centre and wider area.

Access to public transport options will encourage a mode shift from private vehicles and this is being further supported by recommended new car parking rates for future development.

Proposed parking rates in the DCP controls for the NEPIA (contained in Attachment 2 to the Local Planning Panel Report) are maximum rates to mitigate parking overflow and reduce dependencies on kerbside parking. These respond to the Integrated Transport Plan (ITP) undertaken for the CBD Planning Proposal which established parking rates for Parramatta City Centre and are being recommended as a framework for determining parking rates within the NEPIA. The NEPIA's anticipated development typology (podium and tower with basement) is further justification for the application of maximum parking rates.

Adopting these recommendations are a response to the key points raised in the submissions regarding parking. Applying *maximum* parking rates for the NEPIA will address car dependency and demand for parking spaces. These controls can be found in **Section 8.3.10.7** of the draft DCP.

5. Environmental matters

- Some respondents expressed concern about potential environmental impacts such as wind tunnelling and heat stress from hard surfaces and removal of trees associated with extending high-rise building forms from the Church Street spine into the NEPIA.

Council Officer response: The recommended draft LEP and DCP controls for the NEPIA allow for 'viewsheds' which provide for a break between buildings extending from the Church Street sites to the NEPIA area. These also enable blue sky views from Sorrell Street. As well, the recommended building footprints in the draft DCP controls seek to provide larger contiguous deep soil areas for planting large trees, which will assist with mitigating wind tunnelling and heat stress impacts.

6. Economic viability and design quality of buildings

Ten (10) (approximately 5%) of respondents expressed that the 6:1 FSR option was the only economically viable option that could adequately fund the turning over of existing development in the NEPIA. These respondents were concerned that where existing buildings provide for less density, these will need to be demolished and replaced with denser buildings that 'make better use' of sites that are proximate to transport infrastructure and the City Centre.

Council Officer response: The respondents of this position did not support their submissions with any economic evidence, the issue of proximity to the city and transport is addressed above.

7. Council endorsement of option 6

Some submitters raised that because Council had previously endorsed a 6:1 FSR for the NEPIA (on 25 November 2019) and because this is a formal position of Council, that it is sufficient for this FSR to be formalised through an LEP amendment.

Council Officer response: Since the exhibition of the Planning Strategy in 2021, further technical urban design and policy work (SEPP) has been undertaken by the Department which is summarised in the Department's Finalisation Report for the CSN SEPP. This work has identified that the NEPIA should form a transition area between the higher density Church Street spine situated within the Parramatta City Centre to the west, and to the Sorrell Street HCA and corresponding R3 Medium Density Residential and R2 Low Density Residential zoned land situated to the east, with the 'viewshed' approach determining this transition height.

Conclusion

As the proposed LEP and DCP amendment progresses (as detailed in the LPP and Council Report), the community, stakeholders and public agencies that provided submissions on the draft Planning Strategy will again be consulted. Consultation will be undertaken in accordance with the requirements of the *Environmental Planning and Assessment Act 1979* and *Environmental Planning Regulations 2021* as well as with the community participation requirements contained in Council's Community Engagement Strategy and any conditions of a Gateway determination issued by the Department (should Council resolve to seek this).