

29th August 2022

To Whom it May Concern,

I object to the proposed 'Gregory Place Build-to-Rent' (BTR) development (SSD-31179510) for the following reasons:

1. Noise from events and functions held in Our Lady of Lebanon Co-Cathedral (Church) Hall and the Church car park impacting the future occupants of the BTR

- The Church Hall is located on the level under the Co-Cathedral and is on the most northern part of the church property immediately adjacent to the proposed BTR. It has windows facing the north which is directly where the proposed residential dwellings will be. It is accessed from the second level of the car park and the western side of this car park. This car park will be directly behind the residential dwellings and is an open car park.

The Church Hall hosts functions on most weekends including wedding parties, birthday parties which are well attended and noisy. This noise will likely annoy and agitate residents in the 483 dwellings who are likely to complain. There are currently residents that live near the Church but none of them are on the northern boundary of the Church where the noise from the Church Hall primarily travels.

- The top and bottom levels of the Church car park host major festivals for special religious days. These occasions include the Feast of Assumption (August 15th) and the Feast of Mar Awtel (27th August). The photos below show the scale of these events.





These festivals are major events that attract Parishioners from all over Australia and other residents from all religious and cultural backgrounds. They are a major component of the vibrant and diverse Harris Park community which both the local and State Government should embrace. Placing 483 residents on the border of the Church will eventually restrain and possibly even halt these community gatherings.

2. Noise from construction impacting sacred liturgies including weddings and funerals

The Our Lady of Lebanon Church is one of the largest Churches in Australia and is constantly used for landmark liturgies. It hosts five Masses every Sunday and three Masses on weekdays which excludes funerals. There are funerals most days of the week and Weddings every weekend. The Church has been completely booked out for weddings on Saturdays for 2023 which reflects the popularity and significance of the Church to the community.

Noise from construction for a large project such as the proposed BTR will certainly have a detrimental impact on these liturgies. The demolition and earthworks, and associated traffic and machinery noise, for a BTR of the scale proposed will be significant and prolonged. Construction noise at levels as high as 60 dB(A)_{Leq(15mins)} (according to the developer's acoustic report) will have a very strong negative impact on the Church's liturgies.

The site's location on the northern boundary of the Church will mean that more construction noise will travel into the Church from directions where there are less windows. The entire northern section of the Church (which faces the proposed BTR site) is covered in stained glass windows and doors which are often kept open during daytime Mass for natural ventilation.

Funerals will be impacted the most. Funerals occur late morning or early afternoon from Monday to Saturday which is when construction will be occurring. Funerals are obviously tough and emotional experiences for grieving families, and it would be horrible for loved ones to have to experience sound pollution from a construction site during the liturgy.

The Acoustic Report states:

“Noise and vibration impacts from the development have the potential to warrant reasonable and feasible mitigation, noise/vibration impacts are not out of keeping with typical major development”.

This is clearly not a “typical major development” and it is worth noting that the proposed BTR project is on land that is not zoned for residential dwellings or commercial uses. It is also located in between a 19th century home and one of Australia largest Church parishes which excludes it from being a “typical major development” for any reasonable person.

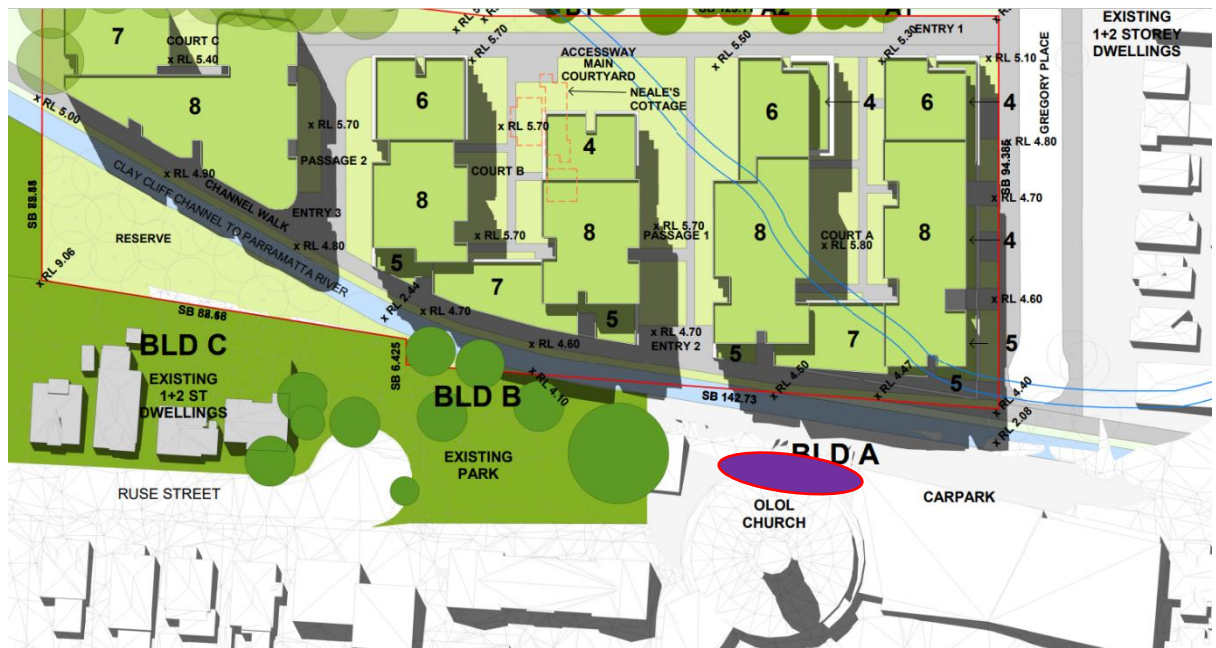
3. Noise from construction impacting the childcare centre

The childcare centre located at the bottom level of the Church car park is on the northern part of the Church site which is the same side as the proposed BTR site. There was no prediction for noise levels at the childcare centre included in the Acoustic Report and the childcare centre was not referenced in this Acoustic Report at all. This is inadequate given that the childcare centre has outdoor play areas (as required by law) that will be closest to the southern boundary of the BTR site. The acoustic report states:

“When using hydraulic hammers near the southern or eastern boundaries of the site, there is a risk of residential receivers on Gregory Place or Ruse Street being highly noise affected (i.e., exposed to noise levels greater than 75 dB(A)_{Leq(15min)})”.

This is clearly an unacceptable impact on the children.

The childcare centre is located the same distance as, if not closer to, the area where construction will occur than the residences in Gregory Place and Ruse Street will be. The outdoor play area is outdoors meaning the noise will be louder than what was recorded in the acoustic report for the residences and Church (internal). The childcare centre’s outdoor play area is approximately where the purple circle is in the image below which borders the narrow creek that borders the BTR project.



4. Impact from residents on liturgies including weddings and funerals, childcare centre, and events

As discussed above, any noise will significantly impact liturgies and the childcare centre. The plans include communal areas which will be loud and there will be no practical way to limit noise in these areas.

5. Heritage

The Gregory Place site is situated within one Parramatta's more significant historical heritage precincts and is located close to several places listed on the SHR (Hambledon Cottage and Experiment Farm).

The site has associations with the life or works of a group of persons of importance in NSW's cultural or natural history (Macarthur family), and the site likely was used by the Macarthur family. There is a chance that historical archaeological resources may be negatively impacted by construction of the site as well as by 438 families living nearby.

6. Traffic

Traffic forecasts were taken on 24 June 2021 which was during the pandemic despite the state not officially being in lockdown. A large portion of the local population were working from

home and were restricting their movement in line with the Government's Covid-19 directions. The traffic report states that:

"This lack of growth trend is considered to continue with more people working from home as a result of Covid and the increasing housing density in the City of Parramatta. Therefore, no future 10 year forecast modelling has been undertaken."

This assumption is short-sighted and is based on unwarranted speculation about people working at home longer-term because of Covid (which doesn't appear to be the case).

7. Impact on Parking

The three paragraphs in the traffic report that relate to parking do not demonstrate the impact that 483 families as well as visitors will have on the local area. More detail on this should have been included in the documents for exhibition for the consent authority to make an informed decision.

8. Inconsistency with Zoning

The site was purchased by the developers for \$4,000,000 in December 2000 as a site that was zoned "IN1 General Industrial".

Residential Accommodation (which includes residential flat buildings and shop top housing) is prohibited under this zoning.

The objectives of this zone under the Parramatta Local Environmental Plan 2011 include:
To minimise any adverse effect of industry on other land uses.

The introduction of build-to-rent housing provisions that were transferred into the Housing SEPP in November 2021 allowed development to be used as build-to-rent housing anywhere that:

- residential flat buildings are, or shop-top housing are permitted
- B3 Commercial Core zoning exists, or
- B8 Metropolitan Centre zoning exists

These provisions did not extend to land that is zoned IN1 General Industrial as well as on land in which Residential Accommodation is prohibited (with the exception of land zoned B3 Commercial Core and B8 Metropolitan Centre).

The Gregory Place Build-to-Rent is a proposal that is attempting to by-pass the build-to-rent housing provisions.

9. Height/Solar

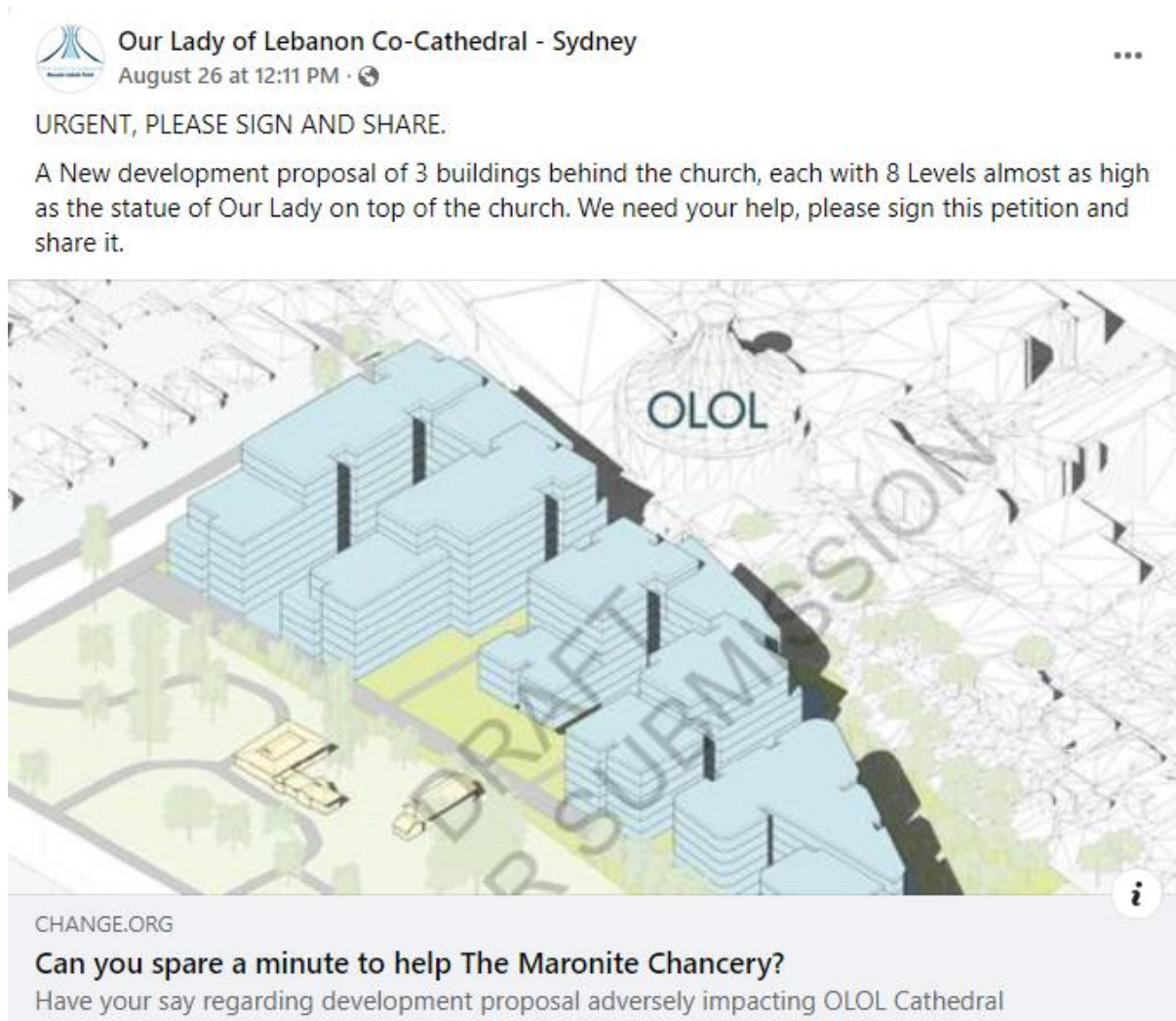
The maximum height according to the LEP is 9.2 metres. The proposed development has significantly exceeded this height limit and at this increased height and proposed use is

extremely inappropriate and will have a negative impact on the surrounding community. There will be significant privacy and over-looking from the proposed BTR.

Views of Co-Cathedral from the public spaces and parklands to the north of the site will be blocked.

10. False claims in the Stakeholder Engagement

The Stakeholder Engagement submitted by the developer in June 2022 states on page 21 that there is “General support for the concept plan and a desire to be closely engaged and involved throughout the process.” This is false and the Church community is clearly strongly opposed to this development which is evident in them having a submission against it, posting about it on their official social media platform (see below) and starting several petitions against it. To imply a level of “general support” is false.



Section 4 of this report is titled “Addressing Key Engagement Issues” but fails to address the impacts on the Church which the same report references including:

- visual impact (it only mentions the visual impact on Hambledon Cottage)
- noise impacts

- wind impacts, and
- impacts of events on residents

11. Oversupply of residential units in Parramatta makes build-to-rent less attractive than in other areas

Build-to-rent projects work best in areas with low vacancy rates compared to nearby areas and low supply of residential apartments. According to [SQM Research](#), Parramatta has had an increasing vacancy rate between 2017 and 2021 (even pre-Covid) and in mid-2021 it had the highest vacancy rate in Sydney in 2021 according to [Domain](#)'s senior research analyst Dr Nicola Powell.

Parramatta is clearly an apartment oversupply area and a build-to-rent project on the outskirts of the city will not address any issues that a typical build-to-rent project seeks to address.

In conclusion, I do not understand how the proposed development of 483 build to rent dwellings on land that is not zoned for residential or commercial uses, located between a 19th century house and one of Australia's largest and most vibrant Church communities, can even get this far in the planning process. For the above reasons, I strongly object to the proposed BTR development and it should be refused as the merits of the proposal are unacceptable and it's not in the public interest.

Regards

