

Annabel Turner
Housing Delivery Assessment
NSW Department of Planning, Housing &
Infrastructure
Parramatta Square
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Your Reference SSD-90243456

Our Reference NCA/20/2025

14 April 2026

Dear Ms Turner

**City of Parramatta Submission to the State Significant Development Application - 2-10
Valentine Ave, Parramatta**

I refer to the request from the Department of Planning, Housing and Infrastructure (DPHI) to provide advice in relation to the State Significant Development application (SSDA) and rezoning application at 2-10 Valentine Ave, Parramatta.

Council Officers have reviewed the Environmental Impact and Rezoning Statement and supporting documentation and **object to both the rezoning proposal and SSD application.**

It is noted that this submission is a holding letter of objection to the development until such time as Council Officers have met with the applicant, Holdmark, on 23 April in relation to key issues. It is noted that Council's request for an extension of time until 24 April (one day after the meeting) was declined by the DPHI. Council is disappointed that an extension has not been granted, as we consider resolving issues upfront with the applicant will ultimately be beneficial to both DPHI and Council and will not fundamentally impact on assessment timeframes.

Council does not support the proposed rezoning due to:

- a) The proposed rezoning to MU1 and facilitation of residential development on the site is inconsistent with the strategic vision outlined in the draft Sydney Region Plan and Parramatta LEP 2023 to realise Parramatta CBD as a metropolitan jobs centre. Residential uses on this site will displace a potential of 2,074 jobs. Good strategic planning must not be eroded when housing capacity is currently being realised on suitably zoned residential land in the City of Parramatta.
- b) The proposed change from commercial floorspace to a significant level of unanticipated residential floor space has a cumulative and a wider shift in inbound and outbound traffic to the Parramatta CBD. The traffic modelling has not captured the impact of overall increase in traffic generation on the broader area. This will set a precedent resulting in cumulative traffic impacts which should be regarded as part of the rezoning

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application.

- c) The proposed height and FSR nominated for 2 Valentine Ave are excessive and result in a built form that creates adverse on-site and external amenity impacts. A high standard of residential architectural design cannot be achieved and therefore the proposed does not demonstrate compliance with Clause 6.13 Design Excellence of the Parramatta LEP 2023.
- d) Whilst the submission of a letter of offer is welcomed, it is not supported in its current form. It is recommended that the applicant further discuss public benefit with Council.

Council does not support the proposed SSD Application for the following reasons:

- a) The removal of a tower setback at 2 Valentine Avenue as compared to the previous schemes, has potential significant adverse wind impacts and amenity impacts on the public domain.
- b) The development has a poor interface with the street due to the jagged protruding walls and balconies and the extent of basement protrusion.
- c) The retrofitting of commercial floorspace for co-living purposes results in substandard accommodation far below best practice industry standards.
- d) Demonstration is required that both buildings are able to be serviced by Council's waste heavy rigid vehicle, allowing for a minimum height of the entry and vehicle route of travel to be 4.5 metres to allow clearance.
- e) The unnecessary removal of all existing trees on site and within the public domain.

I trust this advice is of assistance, however as stated above, please note this is a holding objection letter until such time as Council Officers have met with the applicant. A more detailed response will be provided at that time.

Should you wish to discuss the matters raised in this letter, please contact Myfanwy McNally Manager, City Significant Development on 9806 5447 or at mmcnally@cityofparramatta.nsw.gov.au.

Yours sincerely



Robert Cologna

A/Executive Director City Planning and Design