



Mr Anthony Witherdin, Director, Key Sites  
Assessments  
NSW Department of Planning and Environment  
4 Parramatta Square, 12 Darcy Street  
Parramatta NSW 2124

**Your Reference** SSD-14378717

**Our Reference** NCA/6/2021

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3 February 2023

Dear Mr Witherdin

## City of Parramatta Council submission to Response to Request for Further Information (December 2022) for the Telopea Concept Plan and Stage 1A State Significant Development Application

I refer to the above application and the request from NSW Department of Planning and Environment (DPE) to provide advice on the proponent's Response to Request for Further Information (December 2022). Council Officers have reviewed the material and conclude the following:

- Council does not support the current revised Stage 1A application due to outstanding design matters, unwarranted (further) increase in height and no supplied Clause 4.6 application for variation to the floor space ratio (FSR); and
- Council objects to the Concept Plan as there are significant built form issues and variations from the Parramatta Local Environmental Plan (LEP) and Development Control Plan (DCP) 2011 that are still required to be reconciled by the applicant.

Council Officer's detailed analysis of the Response to Request for Further Information is provided at **Attachment A**, and response to the Design Guidelines at **Attachment B**.

Council Officers wish to highlight the following significant issues:

- **Clause 4.6 of Parramatta LEP 2011 – Variation to Height** Council does not support the proposal for The Core nor Stage 1A to significantly vary the maximum height contained in the Parramatta LEP 2011. The latest plans indicate height increase variations range between 11% to 79% for Stage 1A and 3% to 79% for The Core, which are significant non-compliances. Council does not believe adequate justification has been provided to support the extent of variation being sought. Furthermore, Council does not support the overshadowing impact to Telopea Primary School and Sturt Park as a result of the height increases.

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- **Clause 4.6 of Parramatta LEP 2011 – Variation to FSR** Council does not support the request to significantly vary the maximum FSR contained in the Parramatta LEP 2011 for The Concept development application (The Core and Precincts). It is estimated that this will result in significantly more dwellings envisaged by the Telopea Master Plan and Precinct rezoning processes. The request is inadequate and does not clearly present the variation sought, nor if the variation applies to the Precinct areas.
- Furthermore, a **Clause 4.6 Variation Request for FSR is required to be submitted for Stage 1A detailed development application** as it exceeds the permitted FSR under the Parramatta LEP 2011.
- It is noted that proposed Traffic Control Systems (TCS) do not meet Transport for NSW (TfNSW) warrant assessments. The proposed development cannot be supported on traffic grounds by Council unless **an in-principle agreement between the applicant and TfNSW can be reached for the TCS**.
- The applicant has submitted to Council a request to waive the requirement for the development application for Stage 1A to undertake an architectural design competition. **Council Officers conclude that a waiver should not be granted at this time for Stage 1A** as there are substantial design matters outstanding in order to satisfy the Design Excellence provisions under Parramatta LEP 2011.
- Notwithstanding the above, **Council Officers are supportive of the amendments made to the Design Excellence Strategy** relating to architectural competitions to be held for future development applications within the Concept Area.
- **The proposed building envelopes within the Precincts are not supported** as they constitute an overdevelopment of the sites, largely due to exceedances to maximum permissible FSRs. These building envelopes not only depart from the desired streetscape character and building typology detailed in the Telopea Masterplan and DCP but also result in undesirable outcomes including extra-long facades, reduced setbacks and a lack of deep soil zones. Furthermore, the proposal does not adequately consider impacts on adjacent sites, which may result in site isolation and reduced development potential and inconsistency of built form across the Precinct.
- **Council does not support the content of the Design Guidelines, and as a guide to future applications for the Concept Application**. Instead, the development should comply with the provisions of Council's DCP for the Telopea Precinct which is detailed further in **Attachments A and B**.
- **The public domain must be designed to be consistent with the requirements of the Parramatta Public Domain Guidelines (PPDG) and Council standard construction details**. Any development consent must ensure that final design of future Council parks and footpaths (Council assets) are to be approved by Council prior to Construction Certificate being issued. Council must be assured that they are able to maintain a certain quality of finish within the public domain in perpetuity.

### Voluntary Planning Agreement

Council at its meeting of 12 December 2022 resolved to support the VPA Letter of Offer dated 27 September subject to specific terms. Council notes the importance of a timely resolution of the matter and is committed to working with Frasers and Land and Housing Corporation (LAHC) to endorse and finalise a draft Planning Agreement prior to any consent being issued for the SSD.

### Conclusion

In conclusion, and detailed in **Attachments A and B**, Council remains very concerned that the majority of the comments previously provided in relation to this matter have not been adequately addressed by the applicant.

It is noted that although this submission has not been endorsed by City of Parramatta Councillors, it reflects Council's original endorsed submission on the matter.

Council appreciates the opportunity to comment on the above application and the continued collaboration on this project. Should you wish to discuss the above matters, please contact Bianca Lewis, Executive Planner, City Significant Development on 9806 5531 or at [blewis@cityofparramatta.nsw.gov.au](mailto:blewis@cityofparramatta.nsw.gov.au).

Regards,

**Anthony Newland**  
A/Executive Director City Planning and Design



**Attachment A:** Council's detailed assessment  
**Attachment B:** Comment on Design Guidelines