

Ms Kiersten Fishburn  
Secretary, NSW Department  
of Planning, Housing and  
Infrastructure  
4 Parramatta Square, 12 Darcy Street  
Parramatta NSW 2124

**Your Ref** SSD-79791208

**Our Ref** NCA/6/2025

**Contact** Myfanwy McNally

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22 September 2025

Attention: Peter McManus

Team Leader

Social and Diverse Housing Assessments

Dear Mr McManus,

**Submission to Request for Advice on 2 Fitzwilliam Street Parramatta- State Significant Development Application, Amendment to Concept Application and concurrent rezoning (Ref: SSD-79791208)**

I refer to the above request to provide advice on the proponent's applications in relation to the proposed mixed-used development and rezoning at 2 Fitzwilliam Street, Parramatta (SSD-79791208). Council has reviewed the supplied documentation and formally **objects** to the proposal on the following grounds.

1. **Economic Impacts** – Council resolved at its meeting on 9 December 2024 to oppose the application of build to rent accommodation in the E2 Commercial Centre zone as per extract follows:

*“(f) That Council continue to oppose the application of Build to Rent provisions within the Housing SEPP to the Parramatta CBD’s E2 Commercial Core zone and call on the NSW State government to immediately exempt Parramatta from those provisions, recognising that they are inconsistent with decades of planning for Parramatta’s CBD and are prejudicial to creating a world-class railway terminus and employment centre in Parramatta.”*

The objective of the E2 Commercial Core zone is to prioritise the role of the Parramatta CBD

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in employment generation and as a regional centre for business, retail, community and cultural activity. The inclusion of over 20:1 FSR of build to rent and affordable housing within the commercial core of the Parramatta CBD is at the expense of realising its regional economic role and **therefore in line with Council's resolution, Council objects to the current proposal on strategic grounds.**

Council's current strategic framework allows for sufficient future housing delivery, including within the Parramatta CBD. Council is currently exceeding the NSW Government 2024-2029 housing capacity targets (19,500 dwellings) with a total proposed capacity of 25,540 dwellings. Importantly, City of Parramatta has a target of 150,000 jobs by 2050. **Council requests that an Economic Impact Assessment be prepared** (as outlined by the applicant in its Deliverables List to support the Planning Proposal in 2024) to assess and justify the job losses that will result on site.

**Council further requests that an adaptable design of the tower building be tested to enable its conversion to commercial uses should it be viable to do so in the future.**

2. **Social Impacts** – Council objects to the social impacts of the proposal due to the pressure of unanticipated residential growth on local infrastructure, the poor dwelling mix and under-sized studio apartments. Furthermore, **clarification is required on the proposed planning controls for the site and affordable housing as an additional permitted use.**

The proposal will result in unanticipated residential population growth within a commercial zone. Council's local infrastructure planning, including Community Infrastructure Strategy (July 2020) and associated Parramatta City Centre Local Infrastructure Contributions Plan 2022 does not account for such growth. Therefore, Council requires the applicant to undertake a Social Impact and Needs Assessment, prepared in consultation with Council, to understand the estimated local infrastructure needs (open space, community facilities etc) arising from the future residents. **Council seeks to enter into a planning agreement for works in kind to be delivered on site and/or monetary contribution (in addition to any local contributions payable) to meet this unanticipated infrastructure demand.**

### 3. Design Excellence

**Council Officers request that the Department not grant a design competition waiver until such time that the Design Jury is reconvened to assess the proposal to confirm that the scheme can achieve design excellence as per PLEP 2023.** The change of proposal from

a build to rent and commercial scheme to a majority build to rent scheme has resultant consequences on the design. The Stage1 Concept Approval, floor plate size, separation distances, and setbacks were based on the development having one commercial tower and one residential tower. It is Council Officer opinion that a majority build to rent scheme would be required to reconsidered by a Design Jury in relation to these non-compliances.

It is noted that the Design Integrity Panel has met twice to discuss the proposal. Council Officers have not been present to date in these meetings and are unaware if this is a sufficient process to meet the requirements of Clause 7.13 Design Excellence of the PLEP 2023. Council Officers request the opportunity to provide design feedback to the Jury on the revised scheme.

**Attachment A** details our objection and request for further information.

It is noted that Council Officers have not included an assessment of wind impacts or sustainable development requirements, including under the SEPP (Sustainable Buildings) 2022. Council seeks confirmation the Department has engaged the relevant technical experts to ensure a thorough assessment of these matters has been made. Should you wish to discuss the matters raised please contact Myfanwy McNally, City Significant Development Manager at the above contact details.

Yours sincerely

A handwritten signature in dark ink, appearing to read 'J. Concato', with a stylized, cursive script.

**Jennifer Concato**  
Executive Director, City Planning and Design

# **Attachment A**

## **1.Economic Impacts**

As stated in the covering letter, the Council objects to the provision of build to rent units within the E2 Commercial Centre zone. It is noted that the original concept approval was approved based on additional unlimited office gross floor area permitted under Clause 7.28 of the Parramatta LEP 2023. Therefore, the floor space above 11.5:1 FSR should not be allowed for build to rent or other residential uses.

Notwithstanding the above objection, **a majority commercial scheme should be pursued and if residential uses are sought in the E2 Commercial Centre zone, the following conditions be met:**

- 1 That the majority of the floorspace on the site should be used for a commercial purpose. Noting that the Parramatta CBD rezoning's job capacity estimates relied on assumptions generally relating to achievement of commercial floorspace of 11.5:1 FSR for sites in the CBD zoned E2. Proposals where at least 11.5:1 commercial is achieved and additional FSR for housing uses is proposed may be able to be supported, subject to the other recommendations herein being met satisfactorily.
- 2 A demonstrated community benefit to offset unanticipated residential uses at this site (refer below).
- 3 That no subdivision of residential components be allowed, and that the applicant clearly demonstrates how any residential floor space and above ground car parking floor space proposed is convertible to future commercial uses.
- 4 That the applicant provides a rigorous assessment of the proposal against the E2 zone objectives per the Parramatta Local Environment Plan.
- 5 No floorspace that is only accessible for office premises under PLEP provisions should be allowed to be taken up by residential uses (or any other uses that are not office premises) (refer clause 7.28).

**Furthermore, an Economic Impact Statement must be completed to undertake an adequate strategic assessment of the application.** This should include:

- 1 A clear breakdown of existing GFA and jobs associated with each land use component for:
  - a) the existing uses on site,
  - b) the original approved proposals (DA or concept), and
  - c) the subject amending proposal.
- 2 Assess and justify any difference in job numbers between the existing, original and amending proposals, including long-term economic impacts to the city that might result.
- 3 Provide a clear analysis of demand for retail and other population-serving uses generated by the amending proposal. This should include emphasis on the role of retail in developing a precinct that serves and reflects the scale of the proposal and population in-situ, regardless of eventual use. Any proposal should be justified considering this analysis, ensuring the proposal responds to retail and population-serving demands.
- 4 A rigorous assessment against the E2 zone objectives and Ministerial Directions.
- 5 How any residential floor space proposed is convertible to future commercial uses. This could include requirements for minimum floor to floor heights and re-orientation of lift shafts and the like. It is noted that the podium will still accommodate commercial development that will provide much needed street level activation in this part of the Parramatta CBD.

Parramatta City centre has seen several hotel accommodation approvals. **Council recommends that a Visitor Accommodation Analysis is provided** which demonstrates the feasibility of the proposed hotel use in the Parramatta CBD, considering:

- 1 Overall demand for visitor accommodation in Parramatta
- 2 Key market segments generating demand
- 3 Visitor amenities required, including the potential for the corporate sector

The hotel use should be safeguarded with appropriate controls to prevent conversion to residential in future applications.

## 2. Social Impacts

Council objects to the development on the basis that it would give rise to adverse social impacts, due to unanticipated residential population growth within a commercial zone, poor dwelling mix and unit size. Furthermore clarity is required in relation to affordable housing provision.

### Local Infrastructure

Council's local infrastructure planning, including Community Infrastructure Strategy (July 2020) and associated Parramatta City Centre Local Infrastructure Contributions Plan 2022 does not account for such growth. Therefore, Council expectation is that the proposal will undertake a Social Impact and Needs Assessment, prepared in consultation with Council, to understand the estimated local infrastructure needs (open space, community facilities etc) arising from the future residents. It is noted that the EIS refers to a Social Impact Assessment, however this has not been provided. **Council seeks to enter into a planning agreement for works in kind to be delivered on site and/or monetary contribution (in addition to any local contributions payable) to meet this unanticipated infrastructure demand.**

Council asks the applicant to prepare a **Social Impact and Infrastructure Needs Assessment** in consultation with Council, which includes:

1. Identification of Social Impacts: This involves pinpointing both the positive and negative social consequences of the project, including direct and indirect impacts on communities.
2. Community Profile and Demographic Analysis: This includes understanding the existing demographics of the affected communities, such as population size, age, ethnicity, and gender distribution.
3. Impact Assessment: evaluation of the identified social impacts and potential for mitigation measures.
4. Identification of proposed local infrastructure need: recommended strategies to avoid, minimise, or offset potential impacts.

Noting the Social Impact chapter of the EIS, the Social Impact Assessment should review the estimated resident profile provided by 'HillPDA' and provide commentary on how the proposed dwelling mix accommodates for these future residents.

The assessment is to be undertaken in consultation with Council to understand impacts of additional residential growth with the Parramatta CBD and potential infrastructure needs.

Following the completion of the Assessment, it is anticipated that the applicant would issue a subsequent letter of offer to enter into a planning agreement with Council to deliver works in kind or monetary contribution.

#### Dwelling Mix

**Council Officers object to the current dwelling mix provided and recommends that the social impact assessment be revised to ensure an increase in 2 and 3 bedrooms are provided.** The Social Impact chapter prepared by 'HillPDA' estimates the site uplift to be approximately 1,190 residents, consisting of 206 residents aged 17 or under, 413 young workforce residents, 310 parents and homebuilders, 85 residents aged 60+.

The estimated population growth is based on a proposed dwelling mix outlined in the table below, compared to the requirements of the Parramatta Development Control Plan 2023 (PDCP):

Dwelling Type	No. Units	Dwelling Mix (%)	PDCP Requirements	Compliance
Studio	227	32%	10-20%	No
1-bedroom	350	50%		No
2-bedroom	77	11%	55-70%	No
3-bedroom	46	6.5%	10-20%	No
4-bedroom	3	0.4%	5-10%	No

Based on an assumed resident profile of approximately 310 parents and homebuilders, this presumes a conservative estimate of 155 family households with children (this assumes 2 parent families, suggesting that the figure could be higher with the presence of single parent families). By this logic, the proportion of 2+ bedroom dwellings is severely under supplied, with only 126 suitable dwellings to support at least 155 family households.

Based on the analysis of apartment mix in Parramatta CBD (based on ABS Census 2021) in Figure 1 below, the percentage of 3- and 4-bedroom apartments are below the target threshold of 10% and 5%, while the percentage of 1-bedroom apartments is above the target threshold of 20%. It also demonstrates that there are a significant number of families with children living in 1-, 2-, and 3-bedroom apartments in the Parramatta CBD.

**Table 1: Apartment Mix in Parramatta CBD**

	# apartments in Parramatta CBD	% of apartments in Parramatta CBD	% of apartments in Greater Sydney
One bedroom apartments	1,071	23.6	22.7
Two Bedroom apartments	3,159	69.6	57.3
Three Bedroom apartments	292	6.4	18.0
Four Bedroom apartments	19	0.4	2.0
<b>TOTAL</b>	<b>4,541</b>	<b>100</b>	<b>100</b>

**Table 2: Number of families with children living in apartments in Parramatta CBD**

	# of families in apartments	% of apartments filled by families
One bedroom apartments	151	10%
Two Bedroom apartments	1,173	81%
Three Bedroom apartments	114	8%
Four Bedroom apartments	4	0%
<b>TOTAL</b>	<b>1,442</b>	<b>100%</b>

*\* 'families with children' refer to couples with children or single parents with children*

**Table 3: Proportion of apartments in Parramatta CBD occupied by families**

	Total # of families	total # of units	% of families in apartments
One bedroom apartments	151	1071	14%
Two Bedroom apartments	1173	3159	37%
Three Bedroom apartments	114	292	39%
Four Bedroom apartments	4	19	21%
<b>TOTAL</b>	<b>1442</b>	<b>4541</b>	<b>32%</b>

**Figure 1 ABS Census 2021 data for Parramatta**

One of the key benefits of a BTR scheme is the security of tenure offered to residents, and of particular benefit to families who are seeking stability. Appropriate dwelling mix is critical in ensuring that an adequate supply of housing is provided for all family and household types in the Parramatta Local Government Area.

Council Officers object to the current dwelling mix and recommend that the applicant revise the dwelling mix to deliver a higher proportion of 2- and 3-bedroom apartments to suit a variety of household types, including families with children.



### Unit Size

The size of the studio apartments does not achieve compliance with the minimum apartment internal areas under the Apartment Design Guide (ADG) and should be rectified to meet minimum requirements of ADG.

### Affordable Housing

The Department of Planning, Infrastructure and Housing document titled “Proposed Planning Controls”, August 2025 states that *“the Department proposes to impose a requirement that at least 3,675sqm equating to 6.9% of the total residential gross floor area be provided as affordable housing managed by a registered community housing provider for at least 15 years.”*

Could the Department clarify at the cessation of the 15 years (or the term of affordable housing), what will be affordable housing component become if residential uses are prohibited in the E2 Commercial Zone. Council does not support residential development (or its strata subdivision) in the E2 Commercial Core and therefore we recommend that the affordable housing component be in perpetuity or become a build to rent property.

## **3. Design Matters**

### Meeting Design Excellence

A Design Competition was held based on the Concept approval in 2024 and SJB were the successful architects for the scheme. The current application requests that the requirement for a Design Competition be waived. Council Officers consider that the amendment to the scheme from a build to rent tower and a commercial tower to a majority build to rent scheme would require significant amendments and / or considerations to the design, for example:

- There is no evidence that if the competition had been for residential uses in both towers that this scheme would have been the winning scheme.
- There is substantial evidence that the non-compliance with setbacks in the Stage 1 Concept Approval were made because the proposed uses were for one commercial building and one residential building.

- The Stage1 Concept Approval, floor plate size, separation distances, and setbacks were based on the development having one commercial tower and one residential tower, including
  - The separation distance between the towers is reduced to 15 metres from 18metres. The ADG separation for 2 residential towers is 24 metres.
  - The 6m tower setback from the podium to the western tower on Fitzwilliam Street is reduced to 3m
  - The 6m tower setback from the podium to the eastern tower on Fitzwilliam Street is reduced to 0m with a chamfer from the podium to the tower. The absence of the setback on the eastern tower and the chamfered setback between the podium and tower was introduced and approved in the Stage 1 Concept DA to enable larger footplate in the tower for commercial uses. There is a negative impact of the tower without a setback and the chamfered form on the street interface.
  - The setback to the eastern boundary for the eastern tower is reduced to 7.5 metres from 9m.
  - The setback to the western boundary for the western tower is reduced to 3.5 metres from 9m.

**It is Council Officer's contention that as the eastern tower is no longer a commercial building, there is no justification for the reduction in the setbacks and separation distances. Council Officers request that the Department not grant a design competition waiver until such time that the Design Jury is reconvened to assess the proposal to confirm that the scheme can achieve design excellence as per PLEP 2023.**

Furthermore, Council Officers object to the current design in relation to the following matters listed below.

#### Through Site Link

The through site link between Fitzwilliam and Argyle Streets has been changed in alignment and form from the original Design Competition scheme and **Council Officers object to the current design and request that the pedestrian link be redesigned to reflect the original competition design.** The angled 9 metres wide link was one of the key design features that was supported by

the Design Jury in the Design Excellence Competition. The link connected Wentworth Street spatially to the Transport Interchange with a sight line to heritage Parramatta Train Station. Council envisages this public space as a busy throughfare. As such, Council requests that the design of the space be simplified to suit its usage.

The current proposal locates the link in a different position, widens the space and organises the access through the link across the line of movement rather than with the line of movement. The space, columns, levels and upper-level projections within the link between Fitzwilliam Street and Argyle Street result in a confused illegible space. The various levels, palm trees and skylights indicated, further confuse the space.

Specifically, Council Officers object to the current link design for the following reasons:

- While the link is currently wider, it is much more convoluted and the movement much longer and restricted for wheelchair users.
- It is more cluttered visually, with a lot of columns and trees breaking the sight lines.
- The water feature is not supported and will likely form a trip and fall hazard for people rushing about.
- The two changes in the soffit height of the colonnade on Argyle Street and on Fitzwilliam Street at the entrance to the link confuse the legibility of the entrance to the link and the spatial characteristics of the colonnade. There should only be one change in soffit height over the entrance to the link on both street frontages.
- On Levels 00,01,02 the western wall of the eastern tower and the eastern wall of the western tower have irregular profiles that do not clearly define the space that makes the connection.
- The entrance to the link is recessed under the Level 02 and the upper levels of the podium. This creates an ill-defined relationship between the space, the building and the ground plane of building meeting the ground
- The link connects the station to Jubilee Park. This sight line along Wentworth Street needs to be considered as part of this larger scale relationship between land and water given that the Clay Cliff Creek runs through Jubilee Park (see below figure).

- There is no direct stair access from Argyle Street to Fitzwilliam St. There is an irregular arrangement of columns through the link, and one located directly in front of the stairs from Argyle Street. The through site link needs to be designed:
  - as a simple clear legible space that provides direct views from the east side of Wentworth Street from Jubilee Park through to Argyle Street. See sketch attached for the alignment.
  - to provide both wheelchair accessibility and a stair that provides the shortest access between the two streets
  - to ensure that the columns relate to the built edges so that both the built form edges and the columns define the space rather than the columns sitting randomly in the space.
- The under-croft of the link is to be one level from Fitzwilliam Street to Argyle Street.
- The applicant is to provide accurate plans and sections through the link from Fitzwilliam Street to Parramatta rail station.



**Figure 2** Changes to Through-Site Link

### Public Domain (Argyle Street)

**Council Officers request that the size, location and number of structural columns be revised.** It is noted that the need to reduce the size of columns in Argyle Street was raised by the Design Jury and is supported however the seven additional columns located on the eastern end of Argyle Street adjacent to the façade of the podium confuse the space of the colonnade, impede the reading of the link access and clutter the elevation.

The development is to have a podium with a street wall that comes to the ground and a clear space between the wall and the row of columns forming a colonnade. These columns are to be located on the kerb edge to be in line with TfNSW requirements.

The columns must be much smaller in size than those currently shown to negate the hiding potential, as currently shown columns can create a visual barrier for the bus drivers and passengers alike. The Westfield columns are 900 mm deep with a clear footpath width of 2.4m to the restaurant divider-screens (from back of the columns). Consideration should be given to the removal of this row of columns entirely and cantilevering this portion of the building while keeping the columns clear of the public domain which is approximately 8m wide from kerb to face of the building.

The proposed colonnade in the proposal will currently not form a consistent colonnade with the existing angled columns on the Westfield building. It is essential that this heavily used pedestrian footpath has a clear legible path of travel and a consistent colonnade that ultimately forms a cohesive street edge along the south side of Argyle Street opposite the Parramatta Rail Station.

**The application should be supported by detail drawings and sections showing structural columns that:**

- relate to the existing columns and the kerb alignment on the adjacent Westfield site to the west.
- demonstrate how the column's setback to facilitate clear sight lines for the buses, of the passengers using the buses and has TfNSW support.
- how the proposed alignment, height etc. of the proposed colonnade on 2-10 Fitzwilliam Street does not impede a similar outcome on the site to the west.
- are free of planting to keep clear and free of obstruction for heavy pedestrianised

environment; and

- meet the ground and the soffit in an appropriately articulated way. There is to be no planting in the link, against the façade or along the kerb edge.

#### Public Domain

Materials used in the public domain should be as per the Parramatta Public Domain Guidelines. In the event of the application's approval, Council requests consultation on appropriate conditions of consent relating to standard and treatment of public domain works along Argyle and Fitzwilliam Street/Valentine Avenue.

#### Apartment Design Guide

The number of apartments per floor exceeds the Apartment Design Guide (ADG) maximum recommendation of 8 per floor. Up to 12 units can be considered if the design addresses the additional number of apartments with wider corridors, break out spaces or other mitigating measures. Currently the number of apartments per floor is 12 per floor for the Western tower and 7-14 for the Eastern Tower. **Council Officers recommend that design measures are incorporated on each level that exceeds 8 units**

#### Resolution of the Architecture

The architecture is poorly resolved within the building envelope. The proposal simply applies a façade to the Stage1 Concept DA building envelope. The purpose of a design excellence competition is to resolve the architecture within the building envelope. As a guide the GFA of a residential building is generally 75% of the building envelope on the residential levels. This differential provides enough flexibility to resolve all the issues related to a large complex development. A robust design excellence process is required to resolve the outstanding design issues.

The reason that there are so many non-compliances of the setbacks and the separation distances is because the floor space proposed is too great for the site. The solar access plane and site dimensions support a FSR of 10:1. The proposal argues that the resolution of the building envelope has resulted in a building that can achieve design excellence. The argument references a 'volumetric percentage' of articulation. This is a deeply flawed argument and provides no guidance as to the quality of the architectural resolution. Each building must be judged on its

merits of response to context, composition, materials, proportions and compliance with the PDCP23.

The elevations should be firstly proportioned into horizontal and vertical elements at the scale of the building and then scaled within that overall proportioning. The elevations proposed however simply extend vertical elements the full height of the buildings irrespective of the proportions of the element.

All apartments in the western tower have glazed balustrades and all apartments have awning windows. Corner views are blocked by solid curved walls. The planning and elevations are not nuanced to provide subtle variety in the apartments.

The chamfered setback between the podium and tower was introduced and approved in the Concept Approval to enable a larger footplate in the tower for commercial uses. The tower therefore has no setback to Fitzwilliam Street As the uses are now for residential the larger floorplate is no longer required. The 3m setback from the podium to the tower can be accommodated within the concept envelope. The negative impact of this form on the street edge can be seen in the perspectives. There is no public benefit without the commercial uses.

The chamfered section from level 6- level 12 is an example of the building envelope literally having a façade applied to an envelope rather than a building being resolved within the envelope.

The southern elevation follows the line of the chamfer rather than resolving the structure within the angled profile. This results in is a poor outcome with columns that do not appear vertical and have an inconsistent relationship with the internal blade walls

In the central section of the chamfer on the eastern tower there are planting areas that are overhung by upper levels of planting. These do not provide any benefit to the apartments and are an arbitrary addition to the façade.

The angled building profile increases the visual dominance and apparent bulk. The visual dominance is heightened because the levels above the chamfer have no setback to the street boundary, and the profile does not match the other 3 towers facing Fitzwilliam Street / Valentine Avenue. This section of wall should be vertical and set back on the 3m setback nominated for all tower setbacks along the street.

The change of use from commercial to residential results in a corresponding change of structure from simple open floor plates to individual units separated by walls. This should be reflected in the resolution of the architecture.

The podium western elevation will be joined to a podium when the adjacent site develops. Glazing is inappropriate.

- On Argyle Street:
  - The ground level openings appear out of proportion with the walls that extend to Level 01.
  - The podium does not have a strong horizontal datum where the opening to the link occurs
  - The columns and / or pilasters have no tops or no bases
- On Fitzwilliam Street:
  - The podium does not have a strong horizontal datum at Level 02.
  - The columns and / or pilasters have no bases.
- Columns are to provide a vertical rhythm along the street and columns and walls should be articulated where they meet the ground with appropriate horizontal masonry elements as per the PDCP23. Glazing must sit on a horizontal masonry plinth.
- The curved corners on the western end of the podium of the western tower set up a poor relationship with the site boundary condition

#### Communal open space

Council Officers request more detail on the proposed communal open space areas on the Podium and Rooftop as follows:

- Clarify what spaces are allocated to which users (as the level 2 podium seems to be open to both hotel and residents).
- Provide dimensions of the usable space



- Demonstrate that the climatic conditions, including solar access and wind impacts for each space so to enable comfortable outdoor environments.

## 4. Traffic

### Construction Pedestrian and Traffic Management

A preliminary CPTMP has been provided as part of the TIA. However, this does not go into sufficient details. It is noted that as part of the application for the early works (Council reference DA/392/2024), the preliminary CPTMP provided was considerably more detailed and identified a construction methodology for the superstructure works that is not consistent with that stated in the current SSD. At the time of the Early Works DA, the applicant noted that construction vehicle/works zone provisions could not be made within the site, and they required on-street works zones. Council noted the following issues with this approach.

- A footpath closure would not be supported due to pedestrian safety impacts noting that this is a high pedestrian activity area and is a key route to access the Parramatta Interchange and Westfields.
- The proposal would impact the kiss and ride to the Parramatta Interchange and effectively close this resulting in significant impacts.
- The Proposed Works Zone would have significant impacts on the Traffic Signals at Wentworth/Fitzwilliam/Valentine intersection, including the removal of signal lanterns.
- Concerns were raised regarding the haulage route and the swept paths which did not demonstrate safe access to the site by trucks.

In response to Council's concerns, the applicant suggested deferring this matter to the main works DA which is now being considered. As the above issues are still outstanding, **it is strongly recommended that the applicant be asked to provide a detailed CPTMP prior to any SSDA approval to ensure that a plausible construction methodology is implemented and any additional requirements, such as for the modification of traffic signals or other traffic arrangements, are agreed to as part of any consent.**

### Parking requirements

In accordance with the Parramatta Local Environmental Plan 2023, the retail component of the development can have a maximum of 1 parking space. However, the development proposes a total of 5 spaces including 1 accessible space. It is noted that there are no hotel parking spaces proposed. Accordingly, four of the retail parking spaces are to be reallocated as hotel parking spaces. Alternatively, the four parking spaces are to be deleted from the scheme.

#### Bicycle Parking

The Transport Impact Assessment (TIA) acknowledges that there is a significant shortfall of bicycle parking spaces. In response, it references s. 2.10 of the *State Environmental Planning Policy (Planning Systems) 2021* stating that a DCP is not applicable to State Significant Development Applications. Further, the TIA states that given the site is located close to the Parramatta Interchange, most residents will be walking and catching public transport. Accordingly, it concludes that there will be a low demand for cycling.

However, reference is made to Condition C.40 of the Concept DA which requires future applications to have a provision for bicycle parking spaces regarding the Parramatta DCP 2023. Consideration should also be given to the Parramatta Bike Plan which proposes significant improvements to the bike network within the Parramatta LGA including the city centre. The new infrastructure works that result from the Plan are likely to increase the mode share for bicycles, including for recreation. In this regard, **Council Officers recommend that the proposal be amended to include individual residential storage units that can store a bicycle which could then count as residential bicycle spaces.**

#### Loading & Service Bays

Concern is raised over the design of the service vehicle spaces which are provided as tandem spaces. Should a van be parked in the back space, the front space will be required to load and unload goods, preventing this space's use. As such, tandem parking spaces are not considered appropriate. **Council recommends that the loading spaces (including their layout) should be revised.**

#### Carpark Layout

There are several car parking spaces that do not comply with the Australian standards as follows:

- There appears to be a column that is obstructing access to the two parking spaces in front of the water treatment plant (Refer Plan - Basement Level 5).

- The car share space (Basement Level 2) does not comply as the vehicle envelope (as per figure 5.2 of the standards) will not be able to fit in the space.
- A column located next to some car spaces would prevent doors from opening. It is suggested that a vehicle envelope be placed on each parking space on the plans to easily assess the compliance of the spaces.

**Accordingly, the car park layout is to be amended to address the non-compliances with the standards.**

#### Swept Path Testing for HRVs

**Further testing of swept paths is required for heavy rigid vehicles.** Council is proposing the conversion of Valentine Avenue from the current one-way arrangement to two-way. This conversion will mean that safe access from the site by a HRV will not be possible as the vehicle will need to enter the wrong side of the road to turn left. This conflicts with queued traffic at the signals. A right turn out of the site would be possible in this arrangement, however, it is noted that the driveway is located within proximity to signals, meaning there is no appropriate waiting area within the road. Accordingly, the truck will need to wait within the property boundary until there is a gap in both directions of traffic and there are no vehicles queued. A mitigation measure could be implemented that restricts truck access to off peak times only through a Loading Dock Management Plan.

In the current one-way scenario, a heavy vehicle leaving the site will collide with the blister island and traffic signal lantern. This needs to be addressed, as it will require widening of the driveway to allow more manoeuvring space. Modifications to the light poles and the traffic signal lantern on the eastern side of the road may also be required subject to TfNSW approving changes to the signals. When a HRV will access the driveway in the two-way scenario, it will need the full width of the driveway well into the down ramp. The applicant needs to provide details of measures that will ensure there is no other vehicle travelling in the other direction to avoid conflict on the ramp.

#### Traffic Control Points

**Further information is required regarding any control points into the basement car park to ensure they comply with the relevant clauses of AS 2890.1.** It is noted that the after-hours security gate is in the middle of a steep section of the driveway ramp not suitable for vehicles to stop and wait for the gate to open. In addition, the other security shutter in basement level 1 is in

an area where it may not be possible for an intercom, noting that public access is required beyond this point for service vehicles.

#### Sight Lines

**Council recommends that sight line splays for pedestrian safety are provided and not obstructed in accordance with section 3.2.3(b) of AS 2890.1.**

#### Traffic Generation

Clarification is required as to why the inbound and outbound volumes to and from the site are different in figure 27 and 30, and figure 28 and 31 (of the TIA) given that the only change is the traffic arrangements on Valentine Street. The site itself would still be generating the same amount of traffic. It is noted that these rates are different again to that in Table 13.

Further clarification is required regarding how the traffic generation was estimated for the proposed development. It is noted that the parking supply is predominantly for the BTR which would have similar generation to a high-density residential building. The generation rate proposed in Table 13 are lower than what is suggested in the TfNSW Guide to Traffic Generation. It is noted that the person trip generation in the AM peak is 465 for the residential use. This means that the vehicle trip generation of 56 in Table 13 would represent a mode share of 12%.

With regards to the Traffic Modelling, the following issues have been identified:

- The network model did not include the intersection of Church Street and Argyle Street which is only 55m from the Fitzwilliam and Church Street intersection. Due to the limited storage space, there is reduced capacity for traffic in Fitzwilliam Street to turn right onto Church Street (which in turn effects the left turn). This needs to be factored into the model to ensure accuracy.
- The two existing raised pedestrian crossings on Fitzwilliam Street have not been modelled. These crossings receive continuous heavy pedestrian flow that can cause queues in Fitzwilliam Street to extend back to the Fitzwilliam/ Wentworth/Valentine intersection which impacts the intersections performance.
- The intersection of Woodhouse Lane and Wentworth Street has not been included in the model. It is noted that this is a primary entry and exit for the Parramatta Station Carpark and is a significant traffic generator in the area. Vehicles entering and exiting the car park can

create queues, particularly in the PM peak where southbound traffic in Wentworth Street would need to give way to traffic in Woodhouse Lane leaving the car park.

- It is suggested that a queue length survey be undertaken on the existing road network to better understand the behaviour and constraints of the existing road network.

## 5. Universal Access

**Council recommends that the accessible pathways and adaptable units should be addressed in a revised application.**

### Accessible Pathways

No access has been provided along the Argyle Street boundary (lower ground floor grid line M) with stairs being the only access up to the Fitzwilliam Street driveway. A wheelchair access ramp should be provided in proximity to the stepped access on the eastern edge of the site from Argyle Street to Valentine Street/Fitzwilliam Street. This access point is currently a widely used link by users of all abilities and leads directly to a major public transport interchange.

Access to the internal lift from the retail outlet facing Argyle Street (Lower Ground Floor Gridline F) should be clarified. In addition, access arrangements around/over the water feature on the ground/lower ground floor should also be clarified.

An accessible sanitary facility is required at the Level 6 Function Room. In addition, accessible entry to the pool area is also required.

### Adaptable Units

Part 4Q of the Apartment Design Guide requires residential apartment development to provide adaptable units “...in accordance with the relevant council policy” (Objective 4Q-1). The relevant council policy includes section 3.1.3 of the *Parramatta Development Control Plan 2023* which prescribes 15% minimum of total dwellings to be adaptable units.

Approximately 61 adaptable units are included in the scheme out of a total of 703 units, representing approximately 9% of all dwellings. **Council recommends that an additional 45 adaptable units be provided to ensure compliance with Part 4Q of the Apartment Design Guide.**

In addition, adaptable units type 01 and 02 show the relocation of the shower and toilet pan. The relocation is not necessary and should remain in the pre adaption position with only minor adjustment thus following the requirements of AS4299.

It is noted that the hotel use includes 10 accessible hotel rooms out of a total of 217 rooms. Council encourages the **additional provision of accessible rooms within the hotel**, in accordance with the requirements of Part D4 of the National Construction Code.

## 6. Waste Management

**Council objects to the current proposal on the basis that the proposal is not designed to Council specification for residential waste collection.**

The Waste Management Plan indicates that the residential waste service will utilise a 120L capacity per unit, and the operation will be managed by the Council's waste contractor. Council's waste services are available in either 80L or 140L capacities.

Each floor is equipped with space for 240L recycling bins located next to the waste chutes. In addition, 80L FOGO bins should be included in this area. By giving residents convenient access to dispose of their food and organic waste, we can encourage greater participation in this new waste stream.

Council does not support the use of turntables for gaining access to waste collection points. Where on-site access is required for bin collection, adequate and safe access must be provided for Council's Standard Waste Collection Vehicles from a loading dock. The site must be designed to allow for HRV to enter and exit in a forward direction and to adequately manoeuvre onsite without the use of a turntable. **Council Officers request that the applicant redesign the loading dock without a turntable or demonstrate how it cannot be accommodated turntable-free.**

## 7. Water Management

The SEARS requires the application to satisfy Council requirements and standards in relation to the stormwater design; however, the scheme does not currently meet these requirements. Therefore, **Council Officers recommend that the integrated water management plan and concept stormwater management plan be updated to address the following:**

1. Council requires wherever possible that WSUD be integrated into the landscape and not totally reliant on end of pipe proprietary treatment devices. This proposed design has not met this criterion.
2. Council requires adherence to the following targets to achieve the objectives and provisions of the *State Environmental Planning Policy (Biodiversity and Conservation) 2021* and *Parramatta Local Environmental Plan 2023*.
  - a. Gross Pollutants 90% Reduction in the post development mean annual load of total gross pollutants load (greater than 5mm).
  - b. Total Suspended Solids 85% reduction in the post development mean annual load of Total Suspended Solids (TSS).
  - c. Total Phosphorus 65% reduction in the post development mean annual load of Total Phosphorus (TP).
  - d. Total Nitrogen 45% reduction in the post development mean annual load of Total Nitrogen (TN). Hydrocarbons, motor oils, oil and grease 90% reduction in the post development mean annual load of hydrocarbons, oils, and grease.

Note: Reductions in pollutant loads are relative to the pollution generation from the same development without treatment. This proposed design has not met this criterion.

3. Council requires reduction in the net discharge from the site by 10% compared to the site in an undeveloped (natural state). (Note this is total discharge over the long term and does not refer to OSD.) This is likely to require more substantial rainwater harvesting and use on site. This proposed design has not met this criterion.
4. Council requires design and operation of an integrated water management plan. This would incorporate rainwater capture and use of rainwater in the landscape for irrigation, discharge quantity reduction and improved discharge water quality. This proposed design has not met this criterion. It is noted that the project is committed to dual piping. This should be explored further.

## **8.Landscape Design**

Council Officers requests that the following minor comments be considered in revised landscape drawings, as it relates to the private domain:

- Eucalyptus Radiata is not common in this region and not likely to thrive. Consider replacing it with a suitable, alternative native species from the region such as Angophora Floribunda, Angophora Costata, Eucalyptus Crebra and Eucalyptus Paniculata.
- Dietes Gradiflora is considered an environmental weed species and should be replaced with a similar native alternative species, such as Dianella Caerulea or Dianella Revoluta.
- Banksia Robur requires permanent damp conditions and is unlikely to thrive in this location. Replace with suitable species such as Banksia Spinulosa or Banksia Ericifolia.
- Some trees are shown too close to the adjacent infrastructure/retaining walls (L43). Recommend that all trees are reviewed to ensure the rootballs will not clash with retaining walls/infrastructure. Rootballs should not be cut to fit into a space.
- Soil volume within the ground level (labelled 'The Cove') is insufficient. Soil depth on Level 43 is only 450mm and does not support the mature growth of the proposed trees. Recommend all soil volumes/depths be designed to accord with the requirements of Part 4P of the Apartment Design Guide. All planters supporting trees must be increased to a minimum depth of 800mm.
- All trees should be located at a minimum of 2m from any stormwater line of pit.
- Underground guying is recommended to secure the new trees on the podium structure as opposed to the proposed tree stakes. Trees are to be self-supporting from the nursery.