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Your Reference	SSD-14378717
Our Reference	NCA/4/2021
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4 March 2021

Dear Mr Nixey

SEARs request: Telopea Estate Redevelopment – Concept development application (staged development) and Stage 1A development application

Thank you for the opportunity to comment on the draft Secretary's Environmental Assessment Requirements (SEARs) for this proposal. **Attachment 1** provides Council Officer comments on the draft SEARs and request that they be incorporated in the final SEARs.

Since 2015 City of Parramatta Council has been working in partnership with NSW Land and Housing Corporation (LAHC) to develop the Telopea Master Plan. The Master Plan is an important strategic document which informed the subsequent rezoning of the precinct in 2018 by the DPIE. This close working relationship has continued with LAHC and their development partners, Frasers Property, since 2019 presenting to Council their development concept for the precinct.

All parties would agree that Telopea is a significant redevelopment proposal, with a development lifespan of between 15-20 years seeing significant increase in population which require both State and local infrastructure support. Council notes that the application is inclusive of Council land, including public roads and the Dundas Library site at 21 Sturt Street, as well as delivery of significant local infrastructure, including roads, public parks and community centre and library. Council is currently in negotiations with LAHC and Frasers in relation to a without prejudice planning agreement offer for the precinct.

City of Parramatta requests a meeting with DPIE and LAHC, prior to the finalisation of the SEARs. City of Parramatta believes that a meeting will build on the good working relationship established between the parties, acknowledge and continue the significant amount of strategic work undertaken for the precinct and enable efficient resolution of infrastructure delivery and matters in relation to Council-owned land. We ask that the meeting include the following discussion points:

- Establish a clear ongoing working framework between the parties (e.g. MOU);
- LAHC and Council owned land and intentions for transfer or 'land swaps';
- Infrastructure intended as Council assets;
- Relationship between the State Significant Development application and planning agreement; and
- Scheduling of design workshops.

Council's contact in relation to this matter is Myfanwy McNally, City Significant Development and she can be contacted on telephone 9806 5447 or email MMcNally@cityofparramatta.nsw.gov.au.

Regards,

David Birds
A/Executive Director, City Planning and Design

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ATTACHMENT 1**Draft SEARs - Section****Recommended Additions / Edit to Requirements****Part 1 – Statutory and strategic context**

Council is currently in the process of preparing a draft DCP for the Telopea Precinct. We request that if the draft DCP is available and on public exhibition prior to the EIS being lodged, then the applicant be required to address the objectives, principles and controls contained in the draft DCP.

Council endorsed on the 30 November 2020, the draft City of Parramatta (Outside CBD) Development Contributions Plan 2020 (the draft Plan), which will be placed on public exhibition between March and April 2021. This document provides a list of local infrastructure to be delivered for Telopea. We request that the applicant be required to address the draft Plan as part of the EIS.

The EIS must:

- In relation to the Concept Application, outline future staging of development applications and approvals pathways.
- A clear breakdown of the additional housing and resultant residential population as a result of the floor space ratio (FSR) bonuses that the application is availing under the State Environmental Planning Policies - Affordable Rental Housing and Seniors Living and if the additional housing and population was anticipated for under the Telopea Master Plan and rezoning process. If not anticipated, then the impact on planning and delivery on infrastructure must be addressed by the application.
- Outline the clear process, including legal mechanism, in which LAHC will deal with Council owned land, including closed and disposing of roads, and the Council owned 21 Sturt Street.
- Demonstrate consistency with the following key policies / plans:
 - Telopea Master Plan (2017);
 - Telopea Precinct Draft DCP (if available during preparation of the EIS);
 - draft City of Parramatta (Outside CBD) Development Contributions Plan 2020;
 - Parramatta Community Infrastructure Strategy (City of Parramatta Council, 2020);
 - Parramatta Environmental Sustainability Strategy (City of Parramatta Council, 2017);

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	<ul style="list-style-type: none"> ○ Draft Greener Places Design Guide (NSW Government Architect, 2020); and ○ State Environmental Planning Policy (Vegetation in Non-Rural Areas) 2017.
Part 2 - Design excellence	<p>Stage 1 delivers two key assets to be dedicated to Council – the Arrival Plaza and hill top park. Council requests that it be involved early in the process to ensure any public parks are legible, fit-for-purpose, do not conflict with adjacent land uses and are able to be maintained in the long term. It also needs to be demonstrated that it is possible to meet the design excellence provisions with a concept application.</p> <p>The following should be incorporated into the SEARs to ensure both the delivery of high quality public open space.</p> <ul style="list-style-type: none"> • Prior to the detailed design of Stage 1A proposal being submitted to the State Design Review Panel (SDRP), that the applicant undertake a minimum of three (3) design workshops with City of Parramatta Council in relation to the detail design of Stage 1A proposal and associated public park and plaza. • <u>(additional text in underlined)</u> for the Stage 1A proposal, the detailed design <u>and outcomes from the design workshops with City of Parramatta are submitted to and has been reviewed by the SDRP, and advice addressed, prior to lodgement</u> • Address the design excellence provisions of Parramatta LEP 2011, demonstrating high quality architectural design, materials, detailing and public domain, minimising impacts on view corridors, solar access and existing vegetation, and justify any inconsistencies in detail. Details are to be provided in relation on how the design excellence competition process will be coordinated into the concept approval.
Part 3 – Built form and urban design	<p>It is noted that under s4.23 of the Environmental Planning and Assessment Act 1979 that the Concept Application is an alternative to the development control plan for the subject lands, which will be in place for years to come. Therefore Council officers recommend a series of design workshops be undertaken with Council prior to the finalisation of development application plans and submission of the application. A comprehensive analysis of the built form assessment is to be submitted with the Concept Application.</p> <p>The proposed built form and resultant FSR should be allocated on a block by block basis and indicate the extent of affordable housing GFA per block. The nominated HOB should also be allocated block by block and easily be able to accommodate of any affordable housing and other applicable bonuses.</p>

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	<p>The EIS must:</p> <ul style="list-style-type: none"> • Prior to lodgement of the EIS, that the applicant hold a minimum of 3 design workshops with relevant City of Parramatta staff in relation to the Concept Plan. <p>The Built Form study should include:</p> <ul style="list-style-type: none"> ○ Include a detailed and reasonable justification for any departures from the Telopea Master Plan, particularly in relation to proposed street layout and key built form controls. ○ A detailed built form study illustrated in plan and section showing building envelopes in the Core and their associated future residential and non-residential GFA. This should include the location and extent of any applicable bonuses together with setbacks, separation distances and open space .The GFA is to be calculated at 75% of the GBA for residential uses. This is to demonstrate proposed FSR may be accommodated within the future subdivision plan and permissible height limit. ○ A detailed built form study illustrated in plan and section showing building envelopes and their associated future residential GFA in the non-core areas. The study is to reference Councils Draft DCP for Telopea and include the location and extent of any applicable bonuses. This is to demonstrate proposed FSR may be accommodated within the future subdivision plan and permissible height limit. ○ A detailed built form study illustrated in plan and section showing the edge condition (distances and levels) between built form and streets, pedestrian open space and pedestrian connections. ○ Include a contour and slope study illustrated in plan and section through the precinct (longitudinal and cross sections). The study is to show that the proposed subdivision, built form envelope and street layout (not just existing context) is designed in relation to the natural topography. ○ Demonstrate that it does not adversely impact on the area known as Waratah Shops (the area bounded by the street block Evans Road, Shortland Street, Sturt Street and Benaud Lane) and fetter its development potential or future access arrangements. ○ An isolated lot study is to be provided if it is demonstrated that site amalgamation cannot take place. Further, demonstrate that efforts have been made to acquire any isolated sites located adjacent to sites subject to the

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	<p>concept application, including the consolidation negotiations stipulated in <u>Karavellas v Sutherland Shire Council [2004] NSWLEC 251</u>.</p> <p>Whilst the following detailed comments are not for inclusion in the SEARs response they are provided as preliminary comments to inform the applicant's preparation work ahead of future design meetings.</p> <p>Built Form</p> <p>Proposed building envelopes must define a coherent spatial network. In particular, the spaces within the proposed scheme for the Stage 1A works appear as leftover. Buildings must:</p> <ul style="list-style-type: none"> - Be aligned with streets and public space, resolving any irregular geometries occurring within the spatial structure due to topography. - Not obstruct distant views along streets or pedestrian paths (3D modelling to demonstrate). - Use regular building forms that do not step down the topography, but rather use spatial separation and plinths to enhance and highlight the topography. - Provide a consistent setback and edge to any existing or future streets, where fronts of buildings address the street and any proposed private open spaces present to the middle of the block. <p>The overall masterplan is to maintain the presence of the street wall and tower typology (whereby the street wall may be built to a maximum height of 21m and towers setback to a minimum of 3m above) or perimeter block typology provided breaks in the building are provided (whereby the maximum length of building may be 50m). Cantilevering of tower forms will not be supported.</p> <p>Streets and Through Site Connections</p> <p>The EIS should include a detailed and reasonable justification for any departure from locating streets as per the exhibited Telopea Masterplan (2017), which informed and was formalised in the Parramatta LEP. Any changes to the overall Precinct structure should provide for an equal or better arrangement.</p> <p>Future streets and through site connections are to:</p>

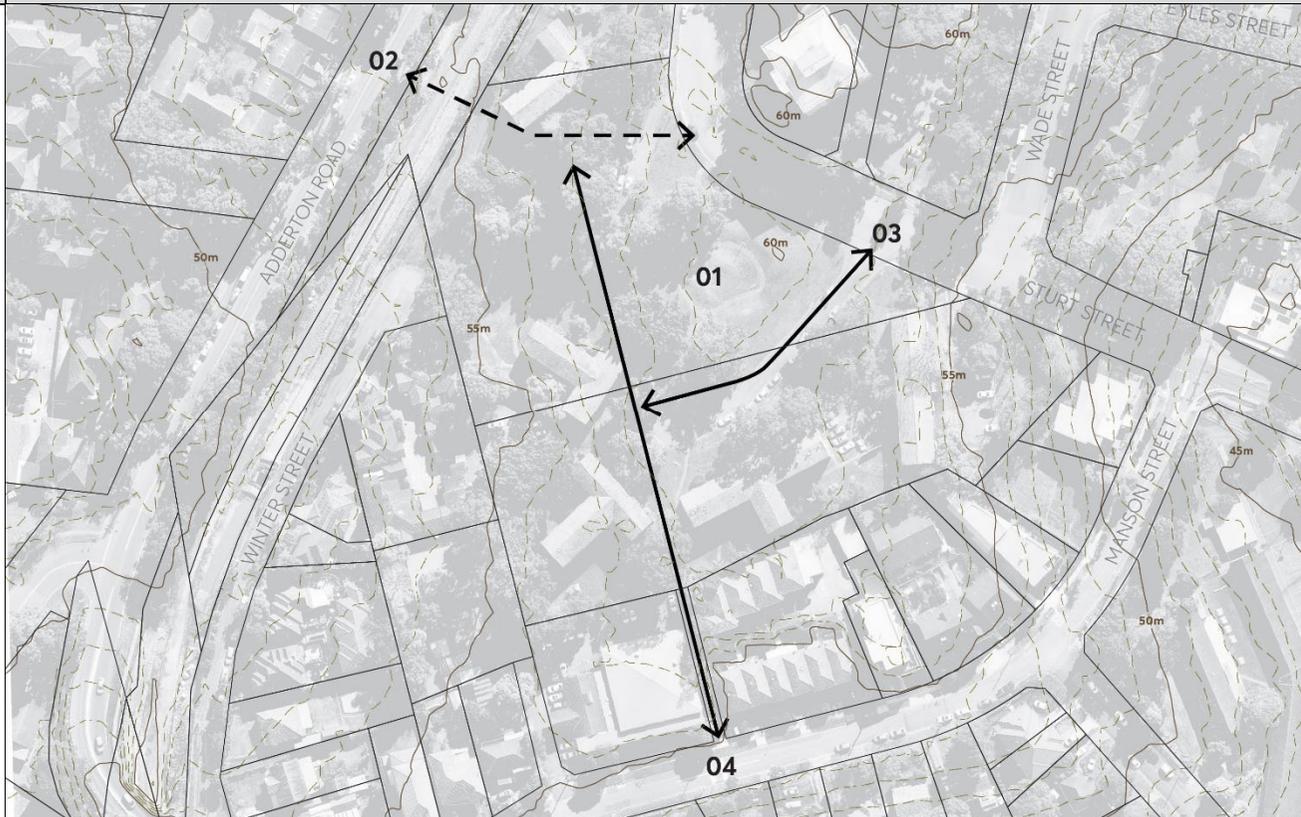
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	<ul style="list-style-type: none"> - Preserve sightlines across the precinct by providing views to sky or terminating in open space. - Be provided as publicly accessible through site links between large street blocks, including new pedestrian and cycle links to the Greenway Corridor. - Have consistent kerb lines and boundary to boundary distances when connecting to the surrounding network so that there is no narrowing of the 'space' of the street between the surrounding area and the core. - Provide all buildings with a legible street address. <p>New streets and/or publically accessible through site links are to be provided as part of the Stage 1A proposal (Polding Place). The proposed form does not adequately provide a legible street address to both buildings on site. At least one publically accessible street (recommended in the approximate location of the existing Polding Place alignment where topography is relatively uncomplicated) is to be provided and represented as part of the future subdivision plan. See below preferred structure of Polding Place:</p>



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- 01) Preferred location for future public open space at highest point on site and Sturt St access
- 02) Approximate location of future street as per Telopea Masterplan 2017
- 03) Preferred location for future publically accessible street (minimum 16m wide)
- 04) Preferred location for future through site link (pedestrian or combination of pedestrian and vehicular access)

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Part 4 – Visual impacts	<p>Visual impact assessment requirements should consider how view corridors are preserved across the precinct and the topography needs to be a key consideration. While it is acknowledged that not all streets can have views to sky, the primary structuring streets and those connecting into the wider precinct should offer uninterrupted views along their axis to contribute to legibility and wayfinding, rather than terminate in buildings. Outside the core area, proposed built form is to provide for breaks between the buildings to provide opportunities for views through the precinct and across Dundas Valley.</p> <ul style="list-style-type: none"> • A comprehensive visual impact assessment of the precinct using 3D modelling. This should include views from the Core, into and through the Core and in the periphery. The assessment should demonstrate principles of minimising the perceived density, revealing the land and retaining and enhancing distant views across Dundas Valley.
Part 5 – Public Domain	<p>It is critical that any public open spaces are of high quality (despite topographical constraints), meet the needs of an increasing population and meet the operational requirements of Council as the future asset owner. Council requires any new public parks to be legible, fit-for-purpose, and must not conflict with adjacent land uses. The following should be incorporated into the SEARs to ensure both the delivery of high quality public open spaces and the retention of mature trees within the precinct:</p> <p>The EIS must:</p> <ul style="list-style-type: none"> • Demonstrate consultation with City of Parramatta Council in relation to design, embellishment, costings, operation and maintenance of future open space. • Detail which public domain elements are to be dedicated to City of Parramatta Council, and how these elements are designed in accordance with City of Parramatta’s Public Domain Guidelines (2017). • Demonstrate how the development will achieve the open space principles and performance criteria in the draft Greener Places Design Guide • Include a public domain plan detailing: <ul style="list-style-type: none"> ○ kerb lines, ramps, stairs, pervious and impervious surfaces; ○ existing trees will be impacted; and ○ to detail the proposed Eyles Street pedestrianisation and associated spaces including show how universal access is to be provided in a coordinated and well integrated manner.

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	<ul style="list-style-type: none"> • Demonstrate that future public open space forming part of the Stage 1A works that satisfies Council's requirements including: <ul style="list-style-type: none"> ○ Be located on the ground and designed to maximise its public frontage. ○ To be edged with a public street on at least two (2) sides, and a minimum 4m wide pedestrian connection on the remaining perimeter. ○ Be clearly public and delineated from any private open space. ○ Not be enclosed by building and sufficiently separated from the face of any private building edge (minimum 4m building setback to any open space, which may contain private landscaping etc.). ○ Be relatively flat. • Consideration of upgrades to public domain of the Adderton Road shops (on the western side of the Light Rail line) should be included in the application, as the resultant increase population will access the services and facilities available at this location.
Part 6 – Trees and Landscaping	<p>The basis of the proposal to maximise the retention of existing high value trees across the precinct is supported, however the EIS must demonstrate that trees are being retained where they are most likely to thrive. Tree preservation cannot be to the exclusion of issues that relate to organising a very high density of development on hilly terrain, and consideration should be given to ensure that streets and open spaces remain the primary organising elements of consequent built form in the Core due to the scalar change in development.</p> <p>If the Eyles Street pedestrianisation is part of the Concept Application, the EIS should detail how trees will not be impacted by the need vertically traverse the Eyles Street connection.</p> <p>The Landscape Plan and Arborist Report must:</p> <ul style="list-style-type: none"> • demonstrate viable long-term retention and health of existing trees in the context of any changes to natural soil levels, solar access, wind patterns and water tables; • maximise shading to public space in summer from the tree canopy; • address and contribute to the objectives of the Parramatta Ways strategy.

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Part 7 – Environmental Amenity	<p>The EIS must</p> <ul style="list-style-type: none"> demonstrate how the proposal achieves a high level of environmental amenity within the proposal and on surrounding buildings, assessing impacts associated with view loss, ventilation, pedestrian movement, access to landscape and outdoor spaces, visual privacy, light, wind. demonstrate how the proposal will mitigate the potential impacts of the urban heat island effect through attention building built form controls, shading and landscape. demonstrate how the proposal reduces reliance on mechanical systems for comfort and ventilation and is provided with passive resilience to plant failure or service interruption. Measures taken to reduce the impact of noise between and onto apartments are detailed, to reduce the impacts of stress on residents and tenants.
Part 8 - Development contributions and public benefit	<ul style="list-style-type: none"> (Note added words <u>underlined</u>). The EIS must address the requirements of any relevant <u>current or draft</u> contributions plan(s), planning agreement or EPI requiring a monetary contribution, dedication of land and/or works-in-kind and include details of any proposals for further material public benefit. Where the development proposes alternative public benefit or a departure from an existing <u>or draft</u> contributions framework, this is to be agreed with Council and relevant State agency, prior to lodgement.
Part 9 – Transport, traffic, parking and access (operation and construction)	<p>Given the scale of redevelopment and proposed alteration to the existing street network, additional information must be provided in the Traffic and Transport Impact Assessment in order to allow for a holistic assessment of traffic impacts and their amelioration.</p> <ul style="list-style-type: none"> The Traffic and Transport Impact assessment must: <ul style="list-style-type: none"> provide information regarding the proposed new roads and upgraded connections in Telopea including cross sections of the new and upgraded roads <u>(additions in underline)</u> provide details of car parking provision, having regard to relevant parking rates <u>the RMS Guide to Traffic Generating Development for high density residential flat buildings within metropolitan sub-regional centre (as a minimum rate) and relevant specifications and standards</u> Identify measures to mitigate traffic impacts on the operation of Telopea Public School.

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	<ul style="list-style-type: none"> ○ Demonstrate how proposed cycleways is consistent with City of Parramatta’s Bike Plan (2017). ○ Proposed bicycle parking associated with residential and non-residential development. ● The plans are to include: <ul style="list-style-type: none"> ○ all proposed off street parking facilities at 1:100 scale or at 1:200 scale (minimum) ○ All parking spaces, aisles, driveways, gradient, columns, and radii, are to be dimensioned. ○ Driveway and ramp access driveway long section profile are to be drawn to 1:50 or 1:100 scales only. ○ The use of parking spaces, such as visitor spaces, is to be labelled. ○ Turning paths are to be provided for critical manoeuvring areas. ○ The car park, including driveways and manoeuvring areas, is to be designed in accordance with the requirements specified in the relevant Australian Standards (AS 2890.1-2004, AS 2890.2-2002 and 2890.6-2009). ○ Where internal waste collection is proposed, specific confirmation that headroom, ramp grades and manoeuvring areas are adequate. ○ Recommendations for any special measures (e.g. mirrors, traffic signals or similar facility) are to be detailed. ○ Demonstrate that all vehicles enter and exist in a forward direction. ● Consideration of traffic impact on the following key intersections: <ul style="list-style-type: none"> ○ Moffatts Drive and Evans Road, ○ Evans Road and Pennant Hill Road., ○ Manson Street and Adderton Road; and ○ Sturt Street and Kissing Point Road

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Part 10 – Ecologically Sustainable Development (ESD) and climate change	<p>The EIS must:</p> <ul style="list-style-type: none"> • demonstrate how the proposal incorporates measures to be ready for connection to the Greater Parramatta and Olympic Park (GPOP) recycled water network identified in the Greater Sydney Commission’s Place-Based Infrastructure Compact and supported by Sydney Water Corporation. • demonstrate BASIX performance is maximised and the extent to which the regulated minimum targets are to be exceeded. • demonstrate how the proposal will provide for immediate or future installation of electric vehicle charging to each residential car parking space with the need to upgrade building infrastructure. • The EIS should be accompanied by the following studies: <ul style="list-style-type: none"> ○ a Passive Resilience Strategy; ○ UHI Mitigation Strategy; and ○ A ESD Analysis and Implementation Report.
Part 12 – Heritage	<p>A State heritage site located at the corner of Adderton Road and Manson Street, known as Redstone. The building was designed by Sir Walter Burley Griffin in 1935 and the garden is an intact example of an interwar garden which contributes to the setting of the house.</p> <p>The EIS must include:</p> <ul style="list-style-type: none"> ○ An assessment of any development within 200 metres of the north and west of the State listed heritage item ‘Redstone’ to ensure that detailed design is sympathetic and responds appropriately to the heritage items in terms of design, form, materiality, setbacks. The assessment should include impact of the removal or pruning of trees does not adversely impact the heritage item.
Part 15 – Social Impact	<p>The Social Impact Assessment:</p> <ul style="list-style-type: none"> • Details of the dwelling mixes to be provided for private/market, social and affordable housing are identified separately, and justifications included.

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	<ul style="list-style-type: none"> Address the identified social infrastructure requirements in the Telopea Master Plan (2017) and Parramatta Community Infrastructure Strategy (City of Parramatta Council, 2020); Address impacts on the capacity and use of existing public open space and community facilities. Demonstrate that the development is maximising opportunities for the provision of additional open space. Address role and use of proposed open space and community facilities for existing and future population. Prior to the lodgement of the DA, consultation with the City of Parramatta in relation to the detail of any proposed library and community facility in relation to its location, building design and fit out. Demonstrate consultation with DET in relation to opportunities for accessible (to the wider community) recreational or community facilities at Telopea Public School.
Part 17 - Staging	<p>The EIS must:</p> <ul style="list-style-type: none"> provide detail regarding the extent to which community service providers that are displaced will be able to be continued and/or transitioned to new facilities.
Part 18 – Social Housing	<p>The EIS must:</p> <ul style="list-style-type: none"> detail measures to prioritise operational efficiency to ensure ongoing housing affordability through reduced utility costs.
20. Infrastructure Delivery	<p>Council endorsed on the 30 November 2020, the draft City of Parramatta (Outside CBD) Development Contributions Plan 2020 (the draft Plan), which will be placed on public exhibition between March and April 2021. This document provides a list of local infrastructure to be delivered for Telopea. We request that the applicant be required to address the draft Plan as part of the EIS.</p> <p>The EIS must (<u>additions are in underline</u>):</p> <ul style="list-style-type: none"> identify future asset owners of key infrastructure, <u>including demonstrated consultation with future asset owners in relation to design, embellishment, costings, operation and maintenance</u> provide details of the proposed staging delivery of key infrastructure, <u>including any disruptions to existing conditions. Where disruptions to communities facilities occur, an outline of measures to ensure minimise disruption.</u>

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	<ul style="list-style-type: none"> the estimated value of key infrastructure, <u>including copies to future asset owners of any Quantity Surveyor or valuation reports.</u> Detail which public domain elements are to be dedicated to City of Parramatta Council, and how these elements are designed in accordance with City of Parramatta's Public Domain Guidelines (2017).
Part 22 Stormwater and drainage	<p>The EIS must include an Integrated Water Management Plan that (note additional items):</p> <ul style="list-style-type: none"> Integrates opportunities for WSUD principles into the development through the design and use of 'green' stormwater systems, biological water retention and treatment and integration of water management into the landscape rather than relying on 'end of pipe' proprietary treatment devices prior to discharge. Maximise pervious surfaces and use soft landscaping and deep soil to promote infiltration and reduce stormwater run-off. Make adequate provision for the control and disposal of stormwater run-off from the site to ensure that stormwater has no adverse impact on Council's stormwater drainage systems, natural watercourses, the development itself, or adjoining properties. The design and location of stormwater drainage structures, such as detention and rainwater tanks, is to be in accordance with Council's Stormwater Disposal Policy and current Development Engineering and Design Guidelines Stormwater, including overland flows entering and discharging from the site, must be managed. The site drainage network must provide the capacity to safely convey stormwater run-off resulting from design storm events listed in Council's Development Engineering and Guidelines.
Part 24 Noise and Vibration	<ul style="list-style-type: none"> The EIS must address any proposal for residential development or sensitive uses adjacent to the Light Rail Corridor and proposal to mitigate noise impacts.
Part 26 - Waste and servicing	<p>Amend to include application to both Stage 1 and Concept DA. Due to the high density development proposed, the method of collection (servicing) is of critical importance to Council. Note this would be a matter usually addressed by a development control plan.</p> <p>The EIS must (<u>added words in underline</u>):</p>

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	<ul style="list-style-type: none"> identify appropriate servicing arrangements <u>in consultation with City of Parramatta Council.</u>
Part 27 – Subdivision	<p>This part of the EIS must apply to both Stage 1 and concept application.</p> <p>To ensure that the proposed development density is predicated, a precise subdivision plan specifying GFA as per a net site area must be provided. Given the changes to the existing street pattern, the applicant is to demonstrate how the following permissible floor space can be accommodated within the proposed master plan. Consideration should also be given to bonuses sought through any affordable rental housing and seniors living bonuses.</p> <p>Future residential and non-residential GFA is to be detailed as part of the submitted envelope plan.</p>
Consultation	<ul style="list-style-type: none"> That the applicant demonstrate consultation in relation to the Stage 1 and Concept DA with City of Parramatta Council within 6 months of the DA being lodged.