

Annabel Turner
Housing Delivery Assessment
NSW Department of Planning, Housing &
Infrastructure
4 Parramatta Square, 12 Darcy Street
PARRAMATTA NSW 2150

Your Reference SSD-90243456

Our Reference NCA/20/2025

Email: annabel.turner@dpie.nsw.gov.au

30 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**. Council met with the applicant on 23 April 2026, and discussed our concerns outlined in the submission. Our detailed submission is included at **Attachment A** and a summary of Council officer's recommendations are at **Attachment B**.

Council does not support the proposed rezoning for the following reasons:

- a) The proposed rezoning to facilitate 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. **Council requests that the DPHI utilise site specific clauses to appropriately manage the proposed changes to the Parramatta Local Environmental Plan (PLEP) as they directly relate to the subject proposal and to minimise impact of future potential job loss on the site in the long term.**
- b) The proposed change from commercial floorspace to a significant level of unanticipated residential floor space, has a cumulative and 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. **The proposal will set a precedent resulting in cumulative traffic impacts which must be considered as part of the rezoning application.**
- c) **The proposed height and FSR nominated for 2 Valentine Ave are excessive and**

Contact us:

council@cityofparramatta.nsw.gov.au | 02 9806 5050
[cityofparramatta](https://www.cityofparramatta.nsw.gov.au) | PO Box 32, Parramatta, NSW 2124
ABN 49 907 174 773 | [cityofparramatta.nsw.gov.au](https://www.cityofparramatta.nsw.gov.au)

result in a built form that creates adverse on-site and external amenity impacts. It is considered that the shop top housing scheme has not demonstrated why it should achieve over and above the base FSR of 10:1 in the Parramatta LEP 2023. **Council recommends that the overall scheme should be reduced in FSR to what is allowable under the Parramatta LEP for mixed use development proposals.**

- d) The proposal allows for significantly more parking than what the current FSR allows under the Parramatta LEP 2023. **It is recommended that no additional parking spaces are allowed beyond the existing permitted FSR in order to manage the cumulative impact of parking within the Parramatta CBD.**
- e) The submitted Letter of Offer is not supported, and 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 current scheme has not been the subject of a robust design review process. The design has changed significantly from the Design Competition process and the Design Review Panel has not been asked to review the current scheme in its entirety. The Design Review Panel should be asked to comment on the scheme in its entirety.
- b) The removal of a tower setback at 2 Valentine Avenue as compared to the previous schemes, has an unacceptable visual impact and potential significant adverse wind impacts.
- c) The development has a poor interface with the street due to the jagged protruding walls and balconies and the extent of basement protruding.
- d) The proposed cluster rooms within the co-living proposal should be improved to meet best practice industry standards and opportunities to increase natural ventilation to rooms and common areas should be revisited.
- e) Demonstration is required that both buildings will be 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.
- f) The unjustified removal of all existing trees on site and within the public domain.

I trust this advice is of assistance. Please note this response has been prepared by Council staff and has not been endorsed by Council. 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



Mark Leotta

Group Manager Development and Traffic Services

Attachment A

1. Proposed Rezoning - Amendments to Parramatta LEP 2023

Council does not support the proposed rezoning based on adverse economic and traffic impacts, and the excessive density and height and resultant negative design impacts as outlined below.

1.1 Economic Impacts

The proposed amendments to the Parramatta LEP 2023 to facilitate residential development is inconsistent with and directly undermine the strategic intent for the site, which is to prioritise the role of the Parramatta CBD in employment generation and as a regional centre for business, retail, community and cultural activity. The Parramatta CBD rezoning's job capacity relies on the deliverable of a minimum of 11.5:1 FSR commercial on this site.

The delivery of residential uses on this site will displace a potential of 2,800 jobs within the Parramatta CBD, unless appropriately drafted controls are in place. This continued pace of ad hoc decisions in relation to housing at the expense of delivery of commercial uses, will cause a jobs crisis in the future. Good strategic planning must not be eroded when housing capacity is currently being realised on suitability zoned residential land in the City of Parramatta.

It is recommended that in the event that DPHI supports residential uses in the E2 Commercial Centre zone, that the Council's proposed site specific clause as outlined in Section 1.4 is applied to the Parramatta LEP 2023. This proposed clause ensures that the commercial floorspace allowed for by the Parramatta LEP 2023 (at a base of 10:1 FSR) may be realised in the future on 10 Valentine Avenue. Council officers have undertaken testing to show that a scheme of 10:1 could be realised on the 10 Valentine site. Therefore, the potential job capacity of 2,800 jobs could remain on the site. Council supports the E2 Commercial Centre zoning being retained on site and that the co-living use (with a capped GFA) is permitted via a site specific clause only.

1.2 Traffic Impacts

The proposed shift from commercial floorspace to a significant level of unanticipated residential floor space, cumulatively, a wider shift in inbound and outbound traffic (i.e. the congestion would be caused by the traffic leaving the Parramatta CBD in the AM and entering the CBD in the PM peak as opposed to the opposite caused by commercial developments).

Further to this, replacing the commercial zoned areas within the Parramatta CBD with residential, will change the travel behaviour of residents, with more having to leave the CBD to travel to their place of work. This results in increased congestion on the regional road and public transport network as opposed to providing residents an opportunity to live in the same suburb as where they work. These factors void several assumptions made in the Parramatta Integrated Transport Plan and the previous extensive planning work for the Parramatta CBD.

It is requested that the traffic modelling be revised to capture 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 regarding as part of the rezoning application.

With regards to the residential apartments, it is noted that these are located on the southern part of the site where the application proposes increasing the FSR from 10:1 to 31.9:1. Applying the Parramatta LEP 2023 parking rates to the proposed yield would result in a maximum of 296 parking spaces. It is Council's practice to generally not permit additional parking spaces beyond the existing permitted FSR. Applying this methodology, the development should not provide more than 93 parking spaces. The proposed development is providing 144 resident spaces, which significantly more than what the current FSRs allow. **As outlined in Section 1.4 below, it is recommended that the number of parking spaces on the proposed site be constrained to ensure more spaces are not permitted than what would be permissible with the current permitted FSR.**

1.3 Floor Space Ratio and Height

The proposed FSR and height nominated for 2 Valentine Ave is excessive and results in a built form that creates adverse on-site and external amenity impacts. Further, the proposed FSR and height means a high standard of residential architectural design cannot be achieved and in Council's opinion, cannot demonstrate compliance with Clause 6.13 Design Excellence of the Parramatta LEP 2023.

Council has concerns in relation to the resultant on-site amenity impacts due to the excessive density and height:

- The floor plate with the jagged external walls and long narrow dimensions results in an expensive and inefficient building with poor internal planning which then creates:
 - One daylight source and no ventilation to corridors.
 - Irregularly shaped rooms within units that are difficult to use efficiently and to furnish.
 - External glass walls are angled so that the outlook from many of the lower-level rooms is into the solid walls of the adjacent apartment not to the street.
 - The triangular balconies have limited useable space and a restricted outlook.
- The proposal has insufficient and poorly designed communal open space.
- The outdoor communal open space is 'left over' from the dominant building form and does not provide a defined comfortable useable space.
- The land is considered unsuitable for permanent residential use because of the noise, vibration, security measures, and limitations on opening windows required along the northern boundary.

Council has concerns in relation to the resultant negative impact on the quality of the public domain as follows:

- The tower comes straight to ground with no street wall to relate to the street scale, other buildings, or to provide visual delineation of the tower above the podium. This creates a

poor interface with Valentine Avenue and Parkes Street. This is further exacerbated by the proportion of ground floor that is above the street level, the lack of active frontage, and the interface with proposed blank and intrusive façade fins at ground level.

- The excessive height has impact on residential amenity, including poor social cohesion, lack of cross ventilation and compromised by wind and associated noise impacts.
- Negative wind impact on pedestrian comfort levels in Parkes Street and Valentine Avenue (south end). Refer further comments on wind impacts below.
- The separation distance across Valentine Avenue is approximately 18 metres which is well below the ADG recommendation of 24 metres for the proposed residential use.
- The proposal removes all existing trees on the site and in the public domain surrounding the site with consequences for local landscape value, public domain amenity and the enhancement of green infrastructure in the short and long term.

It is Council's opinion that design excellence has not been demonstrated at this scale of development, which is far in excess of the scale of other approved mixed use developments within in MU1 zone and which is permitted under current controls. **Therefore Council recommends that the proposed height and FSR of the build to sell tower be reduced to no more than what is currently is available under Parramatta LEP 2023 for mixed use development within a MU1 Mixed Use Zone of 10:1 plus design excellence bonus of 1.5:1. Council estimates this equates to a 32 storey building, with appropriate tower setbacks.**

Notwithstanding, if DPHI were minded to grant an increase in density beyond the current LEP controls to maximise the delivery of housing in the immediate term, then it is requested that the Department ensure design excellence is appropriately tested and achieved and there is relativity to other nearby sites, such as 2 Fitzwilliam.

1.4 Recommended site specific clauses.

In the event that DPHI supports residential uses in the E2 Commercial Centre zone (and outlined in the reasons above), Council officers request that the following drafting of site specific clauses be considered to facilitate the proposed changes for the subject proposal

Relating to that part of the site known as **10 Valentine Avenue, proposing co-living**, Council seeks to ensure that the existing commercial building is retained in single ownership and allows for the conversion or redevelopment to commercial at a later date, and maximise the jobs capacity for the total site in the future. The draft controls as follows:

- a. The proposed site- specific clause allowing co-living to a maximum gross floor area of 17,000sqm is supported.
- b. A clause that stratum subdivision is not permitted; and
- c. If that part of the site is subdivided from the remainder of the site, a covenant be in place to ensure no additional GFA is allowed unless it is for commercial purposes.

Relating to that part of the site known as **2 Valentine Avenue which proposes shop top housing**, that the following be met:

- a. That the proposed mapping of FSR and height is not supported. Council recommends that these controls apply to the current proposal only and not permanent mapped changes to the Parramatta LEP 2023.
- b. Rather, a site-specific clause (as previously sought at SEARs stage) should be drafted requiring that:
 - i. That site-specific controls require that a development application is determined within 2 months and construction substantially commenced within 6 months of the date of gazettal, otherwise the mapped LEP controls apply. This ensures that the development proposed is delivered/developed with the rezoning and is not speculative.
 - ii. A site-specific clause that permits shop top housing and a maximum GFA of:
 - a. 21,910qm, which is equivalent to 11.5:1 on a 1,905sqm site; or
 - b. 31,285sqm, which is equivalent to 16.4:1 on a 1,905sqm site, if the DPHI is minded to grant additional density.
 - iii. No height of buildings control amendment is required.
 - iv. Parking rate is provided a maximum amount to align with the current Parramatta LEP 2023 maximum rate based on the current permitted FSR of 10:1.
 - v. The validity period of any consent issued be reduced from 5 years to 2 years to ensure that the proposed development is commenced within a timeframe commensurate with the intent of the HDA pathway to realise the expeditious delivery of additional housing.

2. Planning Offer

The Letter of Offer to Council (18 December 2025) submitted with the application offers the following in local public benefit:

- 4% of residential floor space of shop top housing building in perpetuity to Council. This includes a pro rata amount to shared residential building facilities (lobbies, communal space).
- Civil and footpath construction along Valentine Avenue to areas fronting the Site.
- Partial exclusion of Section 7.11/ 7.12 contributions due to the letter of offer including footpath/civil upgrades.

Council does not currently support the Letter of Offer for the following reasons:

- Given the site is located in the E2 Commercial Centre zone where residential units for sale are not a permitted use, the proposed residential development will result in unanticipated population growth at this site. The applicant needs to demonstrate consideration of the impact of this population growth on demand for community infrastructure, open space, and other services within Parramatta CBD. The letter of offer should provide a greater public benefit to the community outside of the dedication of affordable housing units.
- Any deduction to applicable developer contributions is not supported by Council.

- The costs associated with upgrades to public domain are considered to be a cost of development and will not be offset from applicable developer contributions.
- The affordable housing component should not be for overall floorspace, rather a proposal for dedication of the number of apartments, their size and bedroom types. The calculation of the floor area should not include a "pro rata amount of shared building facilities." Refer further detail on dwelling mix below.
- Clarify if car parking spaces are included.

The applicant should discuss the above with Council.

3. Integrity of Design Excellence Process

Council raises the following significant concerns in relation to the Design Excellence Process and therefore the ability of the scheme to meet the requirements of Clause 6.13 of the Parramatta LEP 2023.

Firstly, the proposed scheme for build to sell has changed significantly and has not been reviewed by the Design Review Panel. As detailed in Table 1, the current proposal (on public exhibition) is vastly different to the scheme reviewed in October and November 2025 by the Panel as it:

- The 3 metre setback to tower on Valentine Avenue is now removed;
- The small setback to Parkes Street is now removed;
- An increase in GFA. Noting the gross floor area has increased by 8,541sqm (over and above the addition of 4,622sqm of GFA for wintergardens);
- The FSR increased by 4.6:1 (17%)
- The size and configuration of apartments has changed.

Table 1. Details of BTS scheme

Process Stage	GFA	FSR (of BTS site*)	No. of Units	Design
Design Excellence <i>Nov 2024</i>	47,244sqm	24.8:1	715	
HDA - <i>June 2025</i>	Not known		600	
SEAR Scoping Report (<i>Sept 2025</i>)	47,244sqm	24.8:1		
Design Review Panel (Session 2) <i>Nov 2025</i>	47,523sqm (excl Wintergardens) 52,064sqm (incl. wintergardens)	24.9:1 27.3:1	472	3 metre setback to Valentine Ave and setback to Parkes Street.
Environmental Impact Statement (<i>Current</i>)	56,154sqm (excl Wintergardens)	31.9:1	479	Removal of setbacks.

	60,776sqm (incl. wintergardens)			
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**Based on site area of 1,905sqm*

Secondly Council considers that the Alternative Design Excellence Strategy (ADES) and the Design Review Panel process has not been carried out in a transparent and collaborative way for the following reasons.

The ADES (Urbis, 31 October 2025) was endorsed by the Government Architect on 7 November 2025. This was following the first session of the Design Review Panel held on 22 October 2025 and prior to the second session of the Design Review Panel held on 13 November 2025. The ADES states (pg. 6):

"This Strategy was developed in consultation with the GANSW, the Department of Planning, Housing and Infrastructure (DPHI) and Parramatta City Council (Council) and was endorsed by GANSW on 23 September 2025. A Revision was subsequently prepared on 31 October 2025 (this report).

It is noted that the ADES was prepared without Council's consultation and this misrepresentation should be removed from the ADES. Further, Council was not permitted to address the DRP at any point to raise any key design concerns.

Given the finalisation of the ADES during the deliberation of the Panel and the design changes that have occurred since the Panel sat that have not been robustly considered, the overall validity of the design excellence process is questioned.

4. Design Matters

4.1 Tower and Podium Design

Council is not supportive of the removal of a tower setback (as compared to the schemes presented at Design Excellence, Planning Focus Meeting and Pre-Lodgement stages. A distinctive podium / tower form is the built vision for the Parramatta CBD in order to mitigate the impact of the proposed density, create positive outcomes for pedestrian experience within the public domain and in order to manage potential wind impacts at ground level.

The proposed tower comes straight to ground with no street wall to relate to the street scale, other buildings, or to provide visual delineation of the tower above the podium. In place of a street wall, the profile of the lower levels consists of a series of spike elements that cascade around the building on the western, southern and eastern elevations. There is no rationale for these shapes that are difficult to detail and construct. Because of their form they are lightweight construction.

The materials and detailing cannot achieve design excellence because the lower levels are not designed to bring the tower to ground with a sense of robustness and permanence, or to create a satisfactory relationship with the street.

Council recommends the following built form design improvements for the proposed building at 2 Valentine Avenue to improve the relationship of the building to the site, local context, street width and character in line with Parramatta LEP 2023 Clause 6.13 Design Excellence objectives. Key design changes required include:

- creation of a distinct podium/street wall with a tower set back minimum of 3 metres to improve the perception of scale in the street, to better deflect wind downdrafts and to ensure ADG compliant separation distances to surrounding development sites;
- reduced building height in line with a density of 11.5:1, approximately 32 storeys, or that proportional with the adjacent site at 2 Fitzwilliam Street.
- podium height between 13-21 metres with a vertical podium boundary wall on the proposed subdivision boundary line;
- ground floor level stepped with the slope of Valentine Avenue allowing improved activation of the street edge and improved public domain interface; and
- revised elevations and internal planning to achieve a satisfactory relationship with public streets and the rail corridor.

Council recommends the following public domain/interface design improvements at street level to improve the experience of pedestrians in line with the requirements of Clause 6.13 of the Parramatta LEP 2023. Key design issues to be addressed include:

- provision of a compliant accessible ramp entry to the retail area from Valentine Avenue at the northern end of the building,
- design review of deep fins in the building façade with blank back of fin façade treatment. This contributes to poor pedestrian experience for journeys along Valentine Avenue to Parramatta Station and blank podium to tower facades as viewed from street level.
- provision of minimum 3.5m ground level setback from back of kerb to building line at the southern end of the building facing Parkes Street to provide adequate public domain amenity, safety and sightlines. Aligning the building to the alignment of the rail bridge abutment is recommended,
- blank walls on Levels 1 to 4 which define the ends of the balconies between residential units.
- retention of existing street trees in Valentine Avenue and existing eucalypts in the southern corner of the site.

5. Wind Impacts

Council has significant concerns in relation to the potential significant adverse wind impacts of the proposal due to the proposed significant height of the shop top housing building and lack of tower setback. Tower setbacks on tall buildings are a critical feature of a tall building used to mitigate wind-induced forces and improve pedestrian comfort by disrupting the airflow.

The results of the submitted Pedestrian Wind Environment Study (WindTech 2026) are queried by Council for the following reasons:

- Not clear if the current design was tested by the Wind Study. Confirm the architectural design used to inform the wind assessment. The Study references an older set of architectural drawings, perhaps with those that include a 3 metre tower setback which the updated set of drawings do not include.
- It is evident from the wind assessment that the most significant impact of development will be pedestrian comfort levels in Parkes Street and the lower reaches of Valentine Avenue. Standing pedestrian comfort levels are exceeded and wind classification only just satisfies 'walking' comfort levels. This is a considerable impact resulting from a single development. It is unclear if the assessment considers cumulative wind implications of development potential around the site.
- Based on Council's experience in assessment of tall towers it is considered that the extent to which this development impacts wind comfort levels in the public domain would be considerable. The over reliance on landscaping to mitigate impacts is not supported.

In conclusion, Council recommends that DPHI undertakes a wind engineer peer review of the Study.

6. Land Use Planning

6.1 Dwelling Amenity, Size and Mix

Co-living

In relation to the non-compliance for co-living room sizes under the Housing SEPP, Council recognises that 'cluster rooms' are a common model used by other student housing providers across Australia¹, including Scape and Iglu. However, it is observed that these student housing providers are still able to provide bedrooms of 12sqm+ and/or include separate ensuites for each occupant, referring to the following examples:

- Shared Apartment in Sydney Central for Students | Scape
- Single Room - 4 Share at Iglu Central Park, Sydney | Iglu
- Single Room - 5 Share Apartment at Iglu Chatswood, Sydney | Iglu

¹ [How architects are improving Melbourne's purpose-built student accommodation towers](#)

The applicant should consider alternative configurations which allow for larger private spaces associated with cluster rooms in line with best practice.

The lack of operable windows is a concern related to the co-living dwellings. There is a risk that ventilation will be poor, which may negatively affect resident wellbeing.

Furthermore, page 51 of the EIS states that *"the development seeks to introduce façade louvers on the northern elevation to enable natural ventilation into the floor plate. The façade louvers are proposed to be automated and managed by building services"*. It is a further concern that occupants will have no control over the ventilation of their private spaces.

Council recommends that the design include self-operable ventilation in both rooms and common areas.

Affordable housing

The applicant intends to deliver 4% of the BTS apartments as affordable housing, in perpetuity, dedicated to Council. This includes 19 dwellings of the following mix 6x 1-bed; 6x 2-bed; and 7x 3-bed.

However, Council's Affordable Rental Housing Policy (2024) requires that "Dwellings should reflect the need for diversity in dwelling size. Where multiple dwellings are dedicated, Council will seek a mix of one and two-bedroom dwellings, in a ratio of 2:1 (e.g. two one-bedrooms and one two-bedroom dwelling). Where possible, Council will also advocate for the dedication of larger dwellings." The dwelling mix of units proposed to be dedicated to Council should be updated to better align with the ratio detailed in the policy, with the majority being one-bedroom units. It is positive to see 3-bedroom dwellings included in the proposed affordable housing.

6.2 Stratum Subdivision

The proposal seeks consent for stratum subdivision into the following four lots and their general arrangements:

- Lot 1 – comprising the residential units and lobby and services contained in basement.
- Lot 2 – comprising the basement ramps, car parking and one retail unit.
- Lot 3 – retail unit
- Lot 4 – Co-living building and basement

Council seeks clarification as to why the basement carparking and ramp are contained in a proposed separate Lot 2, rather than being included in Lot 1 as part of the build to sell units.

6.3 Proposed Signage

The proposal seeks consent for building signage 'zones' is located on both the shop top housing (4 signage zones) and the co-living buildings (8 signage zones).

Council objects to the inclusion of signage zones within the application. The signage type has not been provided, e.g. business identification signage and therefore a proper statutory assessment cannot be undertaken under the SEPP (Industry and Employment) 2021 or Parramatta LEP 2023. For example a business identification sign is associated with the business carried out at the premises. It is Council's view, the activity of leasing or renting residential units (in co-living case) or the build to sell units does not constitute the undertaking of a 'business or activity' at the site.

Council recommends additional information be provided in relation to the type and design of the proposed signage or it be subject to a separate consent when more detail is able to be provided.

6.4 Pedestrian Access

Confirmation is required from both from the owners of 2 Fitzwilliam Street and Transport for NSW in relation to the future pedestrian access arrangements between Fitzwilliam Street/Valentine Avenue and Argyle Street. The proposal relies on this easement for equitable access to the building. It is noted that Council Officers are supportive of pedestrian access remaining between the two sites, but this needs to be officially secured.

7. Traffic Impact

Further to the comments above in relation to cumulative traffic impacts, Council Officers have reviewed the Transport Impact Assessment (TIA, ARUP, 17 December 2025) and raise the following concerns:

- The modelling was undertaken with SIDRA Intersection as opposed to SIDRA Network and therefore, the effects of traffic queuing at proceeding intersections may not have been modelled accurately to better reflect true road network behaviour.
- With regards to the preliminary CTMP provided within the TIA, it is recommended that it be revised to include the cumulative construction traffic impacts from 2 Fitzwilliam Street SSDA. It is noted that the applicant is currently in discussion with Council and TfNSW to temporarily convert Fitzwilliam Street into one-way westbound to allow construction access to their site which would need to be factored into by the applicant.
- The CTMP should also clarify a) agreement with adjacent land owner to the north for site access; b) the suitability of the southern site access which may result in queuing in Parkes Street. Accordingly, this access is unlikely to be supported by Council during any peak periods; c) Footpath closures in Valentine Avenue will not be supported by Council and relevant permits will not be issued in accordance with the Roads Act; and d) Right turns from Parkes Street onto Valentine Avenue will not be supported for trucks due to the existing queuing in Parkes Street at Station Street. This may create insufficient space for trucks to turn into the street.

8. Parking and Waste Servicing Impacts

Further to the above comments on parking, the following should be addressed by the applicant:

- Based on the TfNSW Urban Freight Forecasting Model, the proposal has a shortfall in loading spaces.
- The co-living development will only be able to cater for a 6.4m SRV, and therefore, will not be able to accommodate Council's Waste Collection vehicle which is a Heavy Rigid Vehicle (HRV) allowing a minimum height of the entry and vehicle route of travel to be 4.5 metres to allow clearance.
- The Swept paths for HRV access needs to assume parking on both sides of the road and the driveway would need to be widened accordingly. As such, the current swept paths do not show satisfactory access to the proposed development.
- The location of any control points and intercoms need to be shown on the plans to ensure compliance with AS 2890.1. The control points must ensure that a vehicle stopped at it does not obstruct the footpath on the frontage road and that the grades are no more than 1:20 as per the standards.
- The non-compliances within the car park of the residential apartments with several columns obstructing the vehicle envelope as per AS 2890.1. Accordingly, these parking spaces are to be removed, or the non-compliances to be addressed.
- Car parking spaces located in between sections 3 and 4, the envelope is being obstructed by the adjacent parking space, and the effective aisle width is being reduced below the minimums due to the angle nature of the aisle. Swept paths should be undertaken to confirm satisfactory entry and exit to these spaces.
- The proposed development, in consideration of its location, falls short of bicycle spaces. (Noting Parramatta DCP requires 919 bicycle spaces and only 192 proposed). The TIA justifies the shortfall by referencing an existing low bicycle usage in current travel to work data. However, this assessment does not give sufficient consideration to the future bicycle infrastructure improvement works that will be occurring in the Parramatta CBD and the wider LGA which aim to reduce the reliance on car usage and increase the bicycle mode share.

9. Water Management

The Integrated Water Management Plan (Arup, 15 December 2025) is satisfactory, however Council requires that in relation to rainwater capture and use, that the reduction in total net discharge of rainwater into the Council system is 10% relative to the site in a natural undeveloped state (not pre- this development). This is likely to require rainwater capture and use on site for landscape irrigation and for possible internal non-drinking water uses. (Note this is separate from the OSD system which only affects short term flows.)

10. Accessibility

A comprehensive BCA and Access Capability Statement (BM+G) has been provided identifying several issues that will be required to be addressed. It is recommended that these issues be addressed in the design.

In relation to the shop top housing, the ramp providing access to the retail shop in the northwestern corner of the shop top housing does not appear to provide suitable clear circulation areas as required within AS1428.1. This is required to be updated to demonstrate compliance.

No pre and post adaption plans have been submitted for either the co-living or shop top housing units to demonstrate the 15% accessible/adaptable units. These units should be representative of a mix of 1, 2 and 3 bedroom units. Furthermore, 15% of the affordable units should demonstrate pre-and post accessible configurations.

11. Trees

It is noted that the proposal includes that all existing trees, regardless of significance, are to be removed to facilitate the construction phase.

The design of a new building on the site can accommodate retention of some trees to contribute to landscape value, pedestrian comfort and visual amenity of the public domain. Retention of existing significant eucalypts on the eastern boundary of the site (Parkes Street), and some or all existing street trees in Valentine Ave should be required.

It is recommended that the Arboriculture Impact Assessment and Landscape Plans demonstrate that opportunities to retain significant trees have been explored and/or inform the design proposal in accordance with SEARs requirements.

Attachment B – Summary of Recommendations

Section / No.	Recommendation
1. Proposed Rezoning - Amendments to Parramatta LEP 2023	- That part of the site known as 10 Valentine Avenue, proposing co-living, Council seeks to ensure that the <u>existing commercial building</u> is retained in single ownership and allows for the conversion or redevelopment to commercial at a later date, and maximise the jobs capacity for the total site in the future. The draft controls as follows: a. The proposed site- specific clause allowing co-living to a maximum gross floor area of 17,000sqm is supported. b. A clause that stratum subdivision is not permitted; and c. If that part of the site is subdivided from the remainder of the site, a covenant be in place to ensure no additional GFA is allowed unless it is for commercial purposes. - Relating to that part of the site known as 2 Valentine Avenue which proposes shop top housing, that <u>the following be met</u>: a. That the proposed mapping of FSR and height is not supported. Council recommends that these controls apply to the current proposal only and not permanent mapped changes to the Parramatta LEP 2023. b. Rather, a site-specific clause (as previously sought at SEARs stage) should be drafted requiring that:

Section / No.	Recommendation
	i. That site-specific controls require that a development application is determined within 2 months and construction substantially commenced within 6 months of the date of gazettal, otherwise the mapped LEP controls apply. This ensures that the development proposed is delivered/developed with the rezoning and is not speculative. ii. A site-specific clause that permits shop top housing and a maximum GFA of: a. 21,910qm, which is equivalent to 11.5:1 on a 1,905sqm site; or b. 31,285sqm, which is equivalent to 16.4:1 on a 1,905sqm site, if the DPHI is minded to grant additional density. iii. No height of buildings control amendment is required. iv. Parking rate is provided a maximum amount to align with the current Parramatta LEP 2023 maximum rate based on the current permitted FSR of 10:1. v. The validity period of any consent issued be reduced from 5 years to 2 years to ensure that the proposed development is commenced within a timeframe commensurate with the intent of the HDA pathway to realise the expeditious delivery of additional housing. - It is recommended that the traffic modelling be revised to capture the impact of overall increase in traffic generation on the broader area - The parking spaces on the proposed site be further constrained to ensure more spaces are not permitted than what would be permissible with the current permitted FSR.
2. Planning Offer	- Council does not currently support the Letter of Offer and the applicant should discuss this matter directly with Council.

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3. Integrity of Design Excellence Process	- Council recommends that Design Review Panel be reconvened to review the proposed scheme for build to sell as they have not reviewed the current scheme currently seeking approval.
3. Design	- Council recommends built form design improvements, including return of tower setbacks, for the proposed building at 2 Valentine Avenue to improve the relationship of the building to the site, local context, street width and character in line with Parramatta LEP 2023 Clause 6.13 Design Excellence objectives. - Council recommends the public domain and interface design improvements at street level to improve the experience of pedestrians in line with the requirements of Clause 6.13 of the Parramatta LEP 2023.
4. Wind Impacts	- Clarification required if the current design was tested by the Wind Study. - Council recommends that DPHI undertakes a wind engineer peer review of the Study.
5. Land Use Planning	- Council recommends that the common room should consider alternative configurations which allow for larger private spaces in line with industry best practice. - Council recommends that the design include self-operable ventilation in both rooms and common areas. - Council recommends the removal of signage zones within the application. Any proposed signage should be associated with business uses and be subject to a future development application. - Proposed stratum subdivision - clarification as to why the basement carparking and ramp are contained in a proposed separate Lot 2, rather than being included in Lot 1 as

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	part of the build to sell units. - Council is supportive of pedestrian access remaining between the two sites, but this needs to be officially secured. DPHI seek confirmation from the owners of 2 Fitzwilliam Street and Transport for NSW in relation to the future pedestrian access arrangements between Fitzwilliam Street/Valentine Avenue and Argyle Street.
6 Traffic Impacts	Further to the comments above in relation to cumulative traffic impacts, Council Officers have reviewed the and raise the following concerns: • Revise the Transport Impact Assessment (TIA, ARUP, 17 December 2025) to include SIDRA Network to model the effects of traffic queuing at proceeding intersections to better reflect true road network behaviour. • The preliminary CTMP to be revised to include the cumulative construction traffic impacts from 2 Fitzwilliam Street SSDA. It is noted that the applicant is currently in discussion with Council and TfNSW to temporarily convert Fitzwilliam Street into one-way westbound to allow construction access to their site which would need to be factored into by the applicant. • The CTMP should also clarify: a) agreement with adjacent land owner to the north for site access; b) the suitability of the southern site access which may result in queuing in Parkes Street. Accordingly, this access is unlikely to be supported by Council during any peak periods; c) Footpath closures in Valentine Avenue will not be supported by Council and relevant permits will not be issued in accordance with the Roads Act; and d) Right turns from Parkes Street onto Valentine Avenue will not be supported for

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	trucks due to the existing queuing in Parkes Street at Station Street. This may create insufficient space for trucks to turn into the street.
8 Parking and Waste Servicing Impacts	Recommendations: - Address the shortfall in loading spaces. - Address how Council will service the co-living development which is a Heavy Rigid Vehicle (HRV) allowing a minimum height of the entry and vehicle route of travel to be 4.5 metres to allow clearance. - Provide swept paths for HRV showing satisfactory access to the proposed development. - The location of any control points and intercoms need to be shown on the plans to ensure compliance with AS 2890.1. - Address non-compliances within the car park of the residential apartments as per AS 2890.1. - Swept paths to car parking spaces located between sections 3 and 4 should be undertaken to confirm satisfactory entry and exit to these spaces. - Address the shortfall in bicycle spaces.
9 Water Management	- It is recommended that the Integrated Water Management Plan (Arup, 15 December 2025) be updated to require that in relation to rainwater capture and use, that the total net discharge of rainwater into the Council system is 10% relative to the site in a natural undeveloped state (not pre- this development).
10 Accessibility	- Address the issues identified in the submitted BCA and Access Capability Statement (BM+G) in a revised design.

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	- The ramp to the retail shop in the northwestern corner of the shop top housing should comply with Australia Standard AS1428.1. - Submission of pre and post adaption plans have been submitted for the co-living or shop top housing units to demonstrate the 15% accessible/adaptable units. - 15% of the affordable units should demonstrate pre-and post accessible configurations.
11 Trees	- It is recommended that the Arboriculture Impact Assessment and Landscape Plans demonstrate that opportunities to retain significant trees have been explored and/or inform the design proposal in accordance with SEARs requirements.