

25 Byron Road  
GUILDFORD NSW 2161

Friends of

*Linnwood*



**Patrons:**

*Mr. Jason Clare, MP  
Federal Member for Blaxland*

*Mr Laurie Ferguson, MP  
Federal Member for Werriwa*

16<sup>th</sup> August 2013

The Director General  
NSW Department of Planning and Infrastructure  
GPO Box 39,  
Sydney NSW 2001

Dear Sir/Madam

**Re: 330 Church Street, Parramatta - Modification to MP 10\_0171 Mixed Use  
Residential Development; Meriton Apartments**

I refer to the Public Exhibition and Invitation to Comment in relation to the application for modifications to the existing approval for development at 330 Church Street, Parramatta.

It is noted that the modification application is seeking permission for:

- the East Tower to be increased in height by 5 storeys (+ 24.8 metres) i.e. 23% increase
- the West Tower to be increased in height by 16 storeys (+ 59.5 metres) i.e. 50% increase
- building signage to be displayed on the serviced apartment tower.

In my opinion the proposed variations to the existing Development Approval represents a major and significant modification to the original proposal and therefore requires a new Development Application that addresses the full impacts of the proposed development in their entirety and within a single document.

Even if this application fulfils the technical requirements for acceptance, its appearance is otherwise. Its approval, in the eyes of the public, would place serious doubt on the integrity of the NSW's legislative planning process, as it creates a two-stage approval process, with the negative outcomes of the development being presented as a minor alteration to an already approved Development Application.

Regarding the increased height and associated signage I refer you to, Part 2, Development In Parramatta City And The Impact On Old Government House And Domain's World And National Heritage Listed Values Technical Report – Views and Settings (2012). Without close examination it can be easily seen that the proposed

**All Correspondence to:**

**Friends of Linnwood Inc PO Box 361 Merrylands 2160 Phone 9632 9203**

**ABN 29 898 374 838 Email: [linnwood@optusnet.com.au](mailto:linnwood@optusnet.com.au) [www.holroyd.nsw.gov.au/linnwood](http://www.holroyd.nsw.gov.au/linnwood)**

modified towers will severely impact the views and setting from Old Government House and the Crescent toward the City and the Kings School, thereby downgrading the value of this world heritage listed site.

I therefore respectfully request that this Modification Application be refused on the basis that it represents a substantive modification to the originally approved Development Application. Should the applicant wish to proceed down this path, a new Development Application should be submitted for the new proposal in all its aspects.

Yours faithfully

A handwritten signature in black ink, appearing to read 'D. Warwick', written in a cursive style.

Dorothy Warwick  
President



*Granville Historical Society Inc*  
*Heritage Research Centre*

ABN 75 439 913 257

*"A place where heritage & culture is valued and celebrated."*

**P.O. Box 320**  
**Granville NSW 2142**

15<sup>th</sup> August, 2013

The Director General  
NSW Department of Planning and Infrastructure  
GPO Box 39,  
Sydney NSW 2001

Dear Sir/Madam

**Re: 330 Church Street, Parramatta - Modification to MP 10\_0171 Mixed Use Residential Development; Meriton Apartments**

I refer to the Public Exhibition and Invitation to Comment in relation to the application for modifications to the existing approval for development at 330 Church Street, Parramatta.

It is noted that the modification application is seeking permission for:

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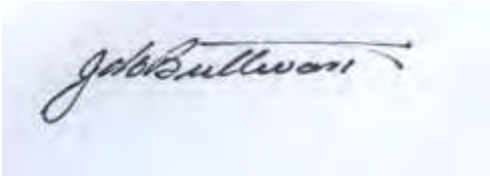
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I therefore respectfully request that this Modification Application be refused on the basis that it represents a substantive modification to the originally approved Development Application. Should the applicant wish to proceed down this path, a new Development Application should be submitted for the new proposal in all its aspects.

*Granville Historical Society members are extremely disappointed in the treatment of the Heritage in NSW by your department and also the Heritage Minister Robyn Parker. We were under the impression that from pre election promises that our Heritage would be looked after without us having to fight for every piece of built heritage in NSW.*

Yours faithfully

A handwritten signature in black ink, reading "June M Bullivant", with a decorative flourish at the end.

June M Bullivant OAM  
Secretary-Treasurer





Contact: Stuart Read  
Phone: 02 9873 8554  
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Email: [stuart.read@heritage.nsw.gov.au](mailto:stuart.read@heritage.nsw.gov.au)  
Our ref: A1545450  
File number: 11/17670  
Your ref: MP 10\_0171 MOD

Mr. Cameron Sargent  
Team Leader  
Metropolitan & Regional Projects North  
Department of Planning & Infrastructure  
GPO Box 39  
SYDNEY NSW 2001

Attention: Ms. Kate MacDonald  
c/o [kate.macDonald@planning.nsw.gov.au](mailto:kate.macDonald@planning.nsw.gov.au)

Dear Ms. MacDonald,

**Re: MP 10\_0171 MOD – 330 Church Street, Parramatta  
Mixed use development - Former David Jones store and adjacent site**

Reference is made to your referral of the above modification of the major project proposal, which was otherwise given delegated Departmental consent on 6 February 2013.

The Heritage Division, on behalf of the Heritage Council, has provided advice on the previous proposal in letters of:

- 6/10/2011;
- 24/11/2011 and 9/12/2011 from the former Chair, Gabrielle Kibble AM;
- 4/2/2013 concerning comments on an archaeological impact assessment, research design and excavation methodology for the subject site.

The Heritage Division notes the modification proposes almost doubling the height of the previously approved proposal, to a maximum of 54 stories and 31 stories and change podium (among other changes). It is considered that the new proposal amplifies what the Heritage Council had concluded were adverse visual impacts on the settings of several major heritage items.

The Heritage Council makes the following points for the Department's consideration:

1. The subject development is in close proximity to a State, National and World Heritage listed item (Parramatta Park and Old Government House as part of a serial site called *Australian Convict Sites*). It is noted that the subject site is outside the 'zone of sensitivity' identified in the 2013 *Views and Heights* (sic) study undertaken by Plannisphere for the Federal Department of Sustainability, the Environment, Water, Population and Communities (DSEWPaC) and Parramatta City Council;
2. The Heritage Council nevertheless considers that doubling of tower heights will have an adverse visual impact on Parramatta Park and Old Government House and particularly on its setting. Views from the courtyard of Old Government House and from its front garden and carriage drive will now have a skyline broken not only by

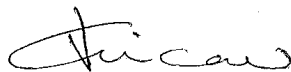
trees but by these towers. At present these views present as 'semi-rural'. They are not broken by high rise towers;

3. The increased podium height of another storey will be out of scale the rest of that block of Church Street, which now is a consistent 2-3 storeys maximum. This and its proximity to Lennox Bridge, a heritage item on the NSW State Heritage Register, are considered inappropriately bulky and not in sympathy with existing streetscape scale;
4. The modified maximum heights do not comply with Parramatta LEP height maxima for the subject block. This sets a precedent for any owner of any site in the LEP area;
5. The Heritage Impact Statement concludes that the proposed development has no impacts on views from this significant heritage item and on its setting. This conclusion is not supported. It is considered that the previously approved proposal had adverse visual impacts. By increasing the height, greater adverse impacts arise.
6. It is also noted that in inscribing the Australian Convict Sites, the World Heritage Committee recommended that the State Party *pay attention to managing the landscape values of the sites in or close to urban areas by studying the visual impact of their current environment and any projects liable to affect those values*. The Heritage Council notes that DSEWPaC have advised there is not a need to seek approval under the Environmental Protection and Biodiversity Conservation Act from the Federal Government in this instance;
7. The 'Aboriginal & Historical Preliminary Archaeological Impact Assessment 330 Church Street, Parramatta' by AHMS, dated 2011 does not appear to comply with the Director General's Requirements (DGR) for the Project which require that assessment of Aboriginal and non-indigenous archaeological resources, *including* an assessment of the significance and potential impact on the archaeological resources be undertaken. This report states (page 62) that it has *not included a detailed archaeological potential assessment or a comprehensive significance assessment*. Therefore, it is considered that a detailed archaeological assessment which addresses the above DGR must be undertaken, particularly as the report does detail that the site has the potential to contain early archaeology from Parramatta's history which may be of state significance;
8. Given that the site has the potential to contain early and potentially significant historical archaeology, all archaeological work must be undertaken by an Archaeologist with the appropriate level of experience against Heritage Council Excavation Director Criteria for a site of this nature. Prior to archaeological works commencing on site, the approved Excavation Director must submit a detailed archaeological research design and methodology for these works to the Heritage Division for comment;
9. While the archaeological methodology and research design are found to be generally adequate to guide the future archaeological excavations at 330 Church Street, the lack of detailed research questions within the Research Design for the salvage excavation phase is an issue;

10. Whilst it is acknowledged that the salvage phase will only go ahead based on positive results during the testing program, it is assumed that the Archaeological Research Design will not be revised with detailed research questions and resubmitted for comment between those two phases as this consultation may hold up the works on site;
11. Accordingly, this report needs to be revised to contain detailed research questions suitable for the salvage excavation of this site and resubmitted to the Heritage Division for comment prior to any archaeological works commencing on site;
12. The proposed Excavation Director is Graham Wilson. Mr. Wilson is considered to have adequate experience and knowledge to undertake an excavation of this type, on a site with this extended history;
13. The proposed Co- Director, Laura Matarese has not held an Excavation Directors permit under the Heritage Act, nor does the Heritage Branch have any record of a submission from Ms Matarese against the Heritage Council Excavation Director's Criteria which outlines her knowledge and experience in co-directing an excavation of this nature;
14. Accordingly, the Heritage Division recommends that Ms Matarese be listed as the Site Director for this project. This would allow her to gain the experience and skills which would allow her to co-direct and direct and excavation of this type in the future.
15. It is noted the subject property (the former David Jones Store) is listed as a local heritage item on Parramatta Local Environmental Plan. If retention and adaptive reuse of the above item is unviable, the applicant should be required through detailed consent conditions to provide substantial ongoing best-practice heritage interpretation of the former use of the site in works to be implemented prior to any Occupation Certificate is issued.

For enquiries regarding this matter, please contact Stuart Read at the Heritage Branch on (02) 9873 8554.

Yours sincerely



23/08/2013

**Vincent Sicari**  
Manager Conservation Team  
Heritage Branch  
Office of Environment and Heritage  
**As Delegate of the Heritage Council of NSW**



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11 August 2013

Department of Planning and Infrastructure NSW

ONLINE SUBMISSION

Dear Sir/Madam

**Re: MP 10\_0171 MOD 3 - Mixed Use Residential Development – Meriton Apartments Pty Ltd,  
Residential Development, 330 Church Street, Parramatta, NSW**

Thank you for the opportunity to comment on this proposal. I provide this letter as a submission on behalf of Australia ICOMOS.

ICOMOS – the International Council for Monuments and Sites – is a non-government professional organisation that promotes expertise in the conservation of cultural heritage. ICOMOS is also an Advisory Body to the World Heritage Committee under the World Heritage Convention. Australia ICOMOS, formed in 1976, is one of over 100 national committees throughout the world. Australia ICOMOS has over 500 members in a range of heritage professions. We have expert members on a large number of ICOMOS International Scientific Committees, as well as on expert committees and boards in Australia. We have a particular interest in Australia's world heritage sites.

We note that this referral relates to the same development in Referral No. 2011/6166 and Referral No. 2012/6358, although this proposal **involves a substantial increase in height of the towers**, increasing the height of the East Tower by 24.8 metres to RL 116.3m and the West Tower by 59.5 metres to RL185.1m. **Our previous concerns with the development are now greatly increased by this current modification proposal which dramatically increases the height.**

We have referred to The Old Government House Views and Settings study (2012) by Planisphere and highlight that this document has used as its basis the existing Parramatta City Centre LEP 2007 which states that for the zone where the development is to be located, the maximum building height is 80 metres. It must be assumed that this has been the standard against which development impacts have been measured in that study.

I refer to your correspondence of 1 July 2013 which notes that the applicant is now seeking approval to increase the East Tower to RL 116.3m and the West Tower to 185.1m. The latter is more than double the 80 metre height against which the view analysis has been assessed.

We further note that the Planisphere report has assessed the views from Old Government House across to the proposed development site as being of either **high** or **moderate** significance in relation to the site's heritage values (summarised p. 31). However, the report locates the development in the 'middle ground' and suggests that: *Development in these areas may have some impact, but there is no risk of resulting in a significant impact upon the World and National Heritage values* (p. 80). The justification for this assessment is included on the same page, based on a consideration that visual impact reduces with distance. It is equally arguable that while distance will decrease visual impact, increasing the size of a feature in that view line will concomitantly increase visual impact. As the original assessment has a baseline of an 80 metre height, we argue that it is not valid to assume there will be no impact on heritage values if the height is more than double that on which the original assessment was based.

Hence we suggest that there is indeed a potential for this increased height to detrimentally impact on the setting of Old Government House and Domain, Parramatta Park, and negatively affect the place's heritage values, including World Heritage values. The current referral documentation cannot rely on existing view line analyses and has not addressed the impact of this newly proposed amendment in height on the setting of Old Government House and Domain, Parramatta Park.

The heritage significance of this important and valuable part of our cultural heritage is linked to the retention of this significant setting.

As stated in our previous submissions, the Australian government is aware that the impact on heritage values of developments in areas surrounding a World Heritage property is of interest and can be of serious concern to the UNESCO World Heritage Committee. In the Australian context this has recently been reinforced by the Reactive Monitoring Mission to review actions in relation to the Great Barrier Reef World Heritage Area. We are confident that the Australian government would not wish to attract a similar mission or questions in the case of the Australian Convict Sites World Heritage property. Paragraph 172 of the Operational Guidelines provides a mechanism to refer concerns from State Parties – particularly 'new constructions which may affect the outstanding universal value of the property' – and we urge the Australian government to take this opportunity to seek feedback from the World Heritage Centre in a timely way. This would seem an appropriate step to take given the identification of potential development impacts at the time the Australian Convict Sites was added to the World Heritage List. We once again bring your attention the text from the 2010 ICOMOS Assessment report, under the heading 'Development pressures':

*More broadly, some of the sites within the property may be threatened by the development of the property's peripheral area and in its buffer zone, notably in terms of the landscape impact of growing urban environments (see Integrity). This refers in particular to the City of Sydney for Hyde Park Barracks (3) and Cockatoo Island (10), to Parramatta city for Old Government House (2) ... (emphasis added)*

In conclusion we make the following recommendations:

- 1. Prior to this modification to the development being determined, the Old Government House Views and Settings study (2012) is reviewed to assess the impact of buildings at heights over 80 metres, which is the current maximum assessed in zone 3, the location of this development.**
- 2. Under Paragraph 172 of the Operational Guidelines, a mechanism is provided to refer concerns from State Parties, particularly 'new constructions which may affect the outstanding universal value of the property', and we urge the Australian government to take this opportunity to seek feedback from the World Heritage Centre on this development in a timely way.**

Thank you again for your consideration of the views of Australia ICOMOS on this important issue.

Yours faithfully



**MS ELIZABETH VINES OAM, FRAIA, MICOMOS**  
President, Australia ICOMOS



12 August, 2013

The Director General  
NSW Department of Planning and Infrastructure  
GPO Box 39,  
Sydney NSW 2001

Dear Sir/Madam

**Re: 330 Church Street, Parramatta - Modification to MP 10\_0171 Mixed Use Residential Development; Meriton Apartments**

On behalf of the Parramatta Branch of the National Trust I refer to the Public Exhibition and Invitation to Comment in relation to the application for modifications to the existing approval for development at 330 Church Street, Parramatta.

It is noted that the modification application is seeking permission for:

- the East Tower to be increased in height by 5 storeys (+ 24.8 metres) i.e. 23% increase
- the West Tower to be increased in height by 16 storeys (+ 59.5 metres) i.e. 50% increase
- building signage to be displayed on the serviced apartment tower.

It is the opinion of the Branch that the proposed variations to the existing Development Approval represents a major and significant modification to the original proposal (up to 50% increasing heights of the towers) and therefore requires a new Development Application that addresses the full impacts of the proposed development in their entirety and within a single document.

The Branch maintains that even if this application fulfils the technical requirements for acceptance, its appearance is otherwise. Its approval, in the eyes of our members and the general public, would place serious doubt on the integrity of the NSW's legislative planning process, as it creates a two-stage approval process, with the negative outcomes of the development being presented as a minor alteration, of which they are not, to an already approved Development Application.

The prime concern of the Branch is in regards to the increased height and associated signage submitted in the modified proposal. In relation to these concerns I refer you to, *Part 2, Development in Parramatta City and the Impact on Old Government House and Domain's World and National Heritage Listed Values Technical Report – Views and Settings (2012)*.

Without close examination it can be easily seen that the proposed modified towers will severely impact the views and setting from Old Government House and the Crescent toward the City and the Kings School, thereby downgrading the value of this world heritage listed site thereby placing at risk its continued placement on and standing as a world heritage site..

The Branch therefore respectfully request that this Modification Application be refused on the basis that it represents a substantive modification to the originally approved Development

Application. Should the applicant wish to proceed down this path, a new Development Application should be submitted for the new proposal in all its aspects.

Yours faithfully

A handwritten signature in black ink, reading "Brian Powyer". The signature is written in a cursive style with a large, looping initial 'B'.

Brian Powyer  
17 Burton Avenue  
Northmead 2152



Your Reference: MP10\_0171 MOD 3  
Our Reference: NCA/23/2010  
Contact: Mark Leotta  
Telephone: 9806 5450  
Fax: 9806 5901

Director, Urban Assessments  
Department of Planning & Infrastructure  
GPO Box 39  
Sydney NSW 2001

Attention: Kate MacDonald

22 August 2013

Dear Ms. MacDonald,

**Major Project 10\_0171 MOD 3, 330 Church Street, Parramatta  
Mixed use residential and retail development**

I refer to correspondence to Parramatta City Council from the Department of Planning and Infrastructure dated 2 July 2013. This correspondence seeks comments regarding a Section 75W modification application from Karimbla Construction Services (NSW) Pty Ltd, seeking approval for the following amendments to MP10\_0171- 330 Church Street, Parramatta.

- Increase the height of the podium by one storey to RL 23.3m, the height of the eastern tower by five storeys to RL 116.3m, and the height of the western tower by 16 storeys to RL 185.1m. The revised heights of the development are 109.3m for the eastern tower 177.1m for the western tower.
- Add an additional 158 residential apartments to create a total of 378 residential apartments, and the addition of 96 serviced apartments to create a total of 266 serviced apartments.
- Delete 1,152m<sup>2</sup> of retail floor space which will reduce the total retail floor space to 3,201 m<sup>2</sup>.
- Delete the child care centre on level 3.
- Create 112 additional car parking spaces to create a total of 709 car parking spaces.
- Increase the approved GFA by 17,594m<sup>2</sup> to create a total of 61,711m<sup>2</sup> of GFA; and
- Install high level signage.

The application also includes a Draft Voluntary Planning Agreement with Parramatta City Council.

Please see Annexure A for a copy of the plans.

Parramatta City Council's response to the sought changes is provided below:

**1. REFERRALS**



The Section 75W modification application has received comments from the following departments within Parramatta City Council.

- Urban Design.
- Traffic and Transport.
- Social Services.
- Land Use.

The following relevant comments were received:

## **1.1 Urban Design**

### **1. General Comments**

*The quality of the architecture, design response and submission material is generally of high quality and to be commended. However, there are several significant issues and concerns which relate primarily to the podium's interface with Church Street and the public domain.*

#### **Design Excellence Bonus**

*The proposal appears to seek a design excellence bonus of 37.5%, (Annexure 06 Planning Controls Assessment Tables) which does not correspond with Council's proposed increase in the design excellence bonus from 10% to 15%. The additional height and floor space should be justified with reference to the development's public benefit and VPA with Council, rather than citing an increased bonus based on design excellence. This is important as it may appear to set a precedent for future developments to differ from Council's Design Excellence Process.*

#### **Public Benefit**

*The proposed increase in height and FSR above the existing approval would result in a significant uplift in the value of the land. The additional apartments would be on top of the existing approval and command premiums for better views, improved solar access and increased prominence. The public benefit of allowing this additional development to occur should be proportional to the potential increase in value. Additional public benefit that may be appropriate for this location include:*

- *public domain improvements, specifically,*
  - *Lane N2 identified in the Lanes Strategy connecting Philip Lane to Church Street (currently the El Phoenician restaurant);*
  - *River Square – Council has concept plans for the transformation of the adjacent multi-storey David Frater Car Park into a significant new public open space (refer [www.designparramatta.com.au](http://www.designparramatta.com.au)),*
- *affordable housing contributions,*
- *potential asset dedication to Council (any proposal should be referred to ASPM for comment).*

### **2. Context and Site Design**

#### **Height**

*The proposed development exceeds the height controls for the site, with the eastern (109.3m) and western (177.1m) towers both significantly above the 88m maximum height (with design excellence). The additional height alters the built form relationship between the towers. As a result, the height difference appears more pronounced and less complementary in the perspectives.*

*Whilst the additional height creates more slender tower proportions, it also increases the shadow impact of the development. The tower forms are individually relatively slender and orientated north south - which limits the duration of their shadow impact. However, their close proximity means their cumulative shadow impact becomes more substantial. It is noted that the additional overshadowing is not projected to impact on parks or open space but will fall largely on city centre buildings, streets and footpaths.*

**Church Street – Street Frontage Height** *The proposed podium exceeds the DCP Street Frontage Height for Church Street but is shown to relate to the datum established by the dome at the corner of Phillip and Church Street.*

**Church Street – Ground Floor Retail Floor Levels**

*The steps along the Church Street frontage are not supported and the proposed floor levels of the ground floor retail tenancies and colonnade should be lowered to meet the existing street levels, as per Section 3.2.C of the City Centre DCP.*

**Church Street – Individual Retail Frontage**

*There is some concern at the width of the 3 proposed retail tenancies facing Church Street. Section 3.2H of the City Centre DCP limits the length of individual retail tenancies at ground level to 6m along Church Street (between railway and the river). This is to reflect the fine grain strip retail that has developed and it is suggested that the individual tenancies are divided into smaller shopfronts to encourage a more rich and varied streetscape.*

**Church Street – Podium Corner**

*The retail, commercial and publically accessible floor space in the podium appears to have been reduced to accommodate increased car parking requirements. As a result, the double storey retail tenancies have been limited to the ground floor only and the supermarket and childcare centre have been deleted. Given the reduction in overall non-residential floor space within the podium, it is recommended that the prominent corner of Church Street and the river becomes a multi storey retail, commercial or non-residential tenancy.*



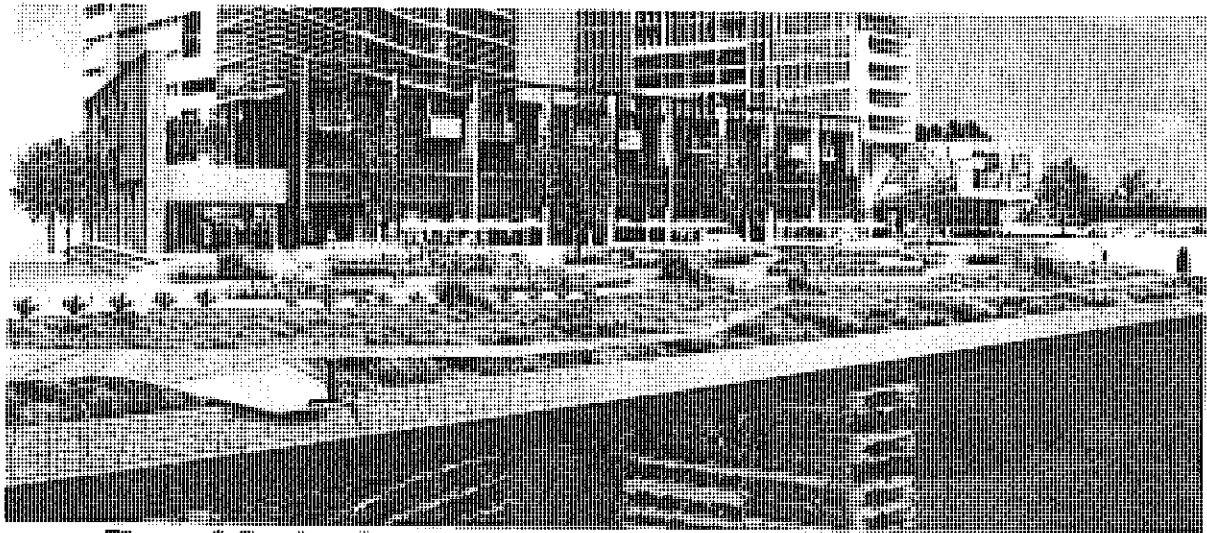
**Figure 1 - River Foreshore – Retail Tenancy Floor Levels**

There is concern at the level difference between the proposed retail areas and the adjoining public domain. Council would like to encourage greater interaction between the retail and the river foreshore, and reduced level changes would help to achieve this. It is suggested that the levels are revised so that they transition to the minimum flood design levels of 6.5m, as per PCC's Riverbank Site Controls. It is noted that the river foreshore interface of the competition entry was a key consideration that was cited in the jury summary table as contributing to the scheme's design excellence.



**Figure 2 Proposed River Foreshore Interface:**

The development is set unnecessarily high along the foreshore, resulting in greater level differences between the retail / outdoor dining and the public domain. The landscaping becomes steeper and less habitable, further disconnecting the development from the adjoining public domain.



**Figure 3 Design Competition Entry:**

*The retail levels are lower along the foreshore, creating a better interface with the adjoining public domain. The landscaping is less steep and the terraces can be better integrated with the outdoor dining. This scheme encourages public activation of the foreshore and the proposal should be amended to reflect the competition entry at the ground / retail level.*

#### **River Foreshore – Landscaping of Dedicated Land**

*The indicative landscape treatment between development and the foreshore appears (in the perspectives) to be inaccessible and forms a planted terraced barrier between the retail edge and the public domain. Greater activation, visual connectivity and physical access between the retail tenancies, the land dedicated to Council and the existing river foreshore is required.*

*Given that the interface with the foreshore public domain is critical to the activation and design excellence of this proposal, it is recommended that a landscape design for the land dedicated to Council is included with this development application so that an acceptable outcome can be assured.*

*Level differences between the retail and public domain should be minimised (refer above) and the landscaping treatment should incorporate paved terraces that include accessible outdoor dining opportunities. A combination of ramps, landings, stairs and planting should integrate the retail edge of the development with the public domain, as per the design competition entry.*

#### **Pedestrian Access (East Tower)**

*The levels and pedestrian access to the east tower lobby should be explained in further detail. There appears to be a level change (RL 6.9-7.5) at the south eastern corner of the site (drawing A100 Plan\_Level 00 Retail) leading into the ET lobby that is not indicated in plan (either by stairs or ramp). Additionally, the levels and interface of the bottom of the diagonal ramp and the adjoining public domain to the east is not clear and further details should be provided to explain this transition.*

*There may be a safety concern between pedestrian access to the ET lobby and vehicular access to the car park. This should be clarified in a*

*site plan which extends to Phillip Street to illustrate the proposed pedestrian access from the footpath to the lobby entrance. It may be safer for pedestrians to access the lobby along the eastern side of the lane to avoid having to cross paths with vehicular traffic accessing the car park entry.*

### **Vehicular Access**

*There is concern at the potential traffic impact of the additional dwellings on the capacity of the proposed vehicular access to the site. The location of roller shutters, screens and security devices at the vehicular entry point should also be indicated on the plans.*

*Further comment should be requested from Council's Traffic Engineer in relation to the proposed vehicular access to the site, the potential for congestion along Phillip Street and the design of the lane (including bollard location and pedestrian access).*

## **3. Building Design**

### **Podium Apartments**

*The sleeving of above ground car parking with active (residential/commercial) uses is generally supported. There is some concern about the ventilation of some kitchens in the single aspect units and the size and function of the studies is also questioned. Given their reduced amenity, it is recommended that the podium apartments sleeving the car park are operated as serviced apartments rather than strata units.*

### **Apartment Balconies**

*The balconies of some apartments appear undersized with reference to SEPP65 and the DCP. Indicative furniture layouts should be provided to demonstrate the functionality of all balconies.*

### **Signage**

*The large Meriton brand and logo is very prominent and it is recommended that it is reduced in size so that it does not detract from the design of the building. Further details of the signage, including its size, material and lighting should be provided.*

### **Comment:**

To address the concerns raised by Council's Urban Designers the following recommendations (as outlined in Section 3) are made:

**NB:** The appropriate level of the retail tenancies as they relate to Church Street and the foreshore area are of critical importance to Council's desired activation of this key site and surrounds.

- The retail tenancies and associated outdoor areas adjacent to the foreshore area to be lowered to RL6.5.
- The retail tenancies and associated outdoor areas adjacent to Church Street are to be lowered so that they are generally level with the footpath on Church Street.

- A more fine grain retail aspect of the development is to be provided along the ground floor of Church Street. Retail frontages should be approximately 6m in width in response to the predominate scale of retail premises on Church Street.
- The corner element of the podium level (as outlined in the comments from Council's Urban Designers above) is to be converted into a multi storey retail/commercial tenancy(s). In addition is recommended that the at least two storeys of retail/commercial tenancies be provided above street level to more adequately respond to the commercial/retail nature of Church Street and the CBD. Please see discussion below for further details.
- To reduce amenity concerns of the apartments which sleeve the podium car park, these apartments should either be serviced apartments or maisonette apartments (see further discussion below).
- Ensure that all balconies comply with the minimum guidelines within SEPP 65's Residential Flat Design Code.
- Greater activation, visual connectivity of the River fronting retail premises and the adjacent land to be dedicated to Council is to be provided. A sophisticated and high quality landscape design is to be incorporated. This design is to provide for a landscaped outcome which responds to the retail level of RL 6.5 and should minimise wherever possible level differences. A combination of ramps, landings, stairs and planting should integrate the retail edge of the development with the public domain. This area should provide for paved areas and accessible dining opportunities.
- Additional detail is required in relation to the pedestrian access into the eastern tower as the level differences indicate possible accessibility problems. It is also noted that there may be a pedestrian – vehicular conflict for the pedestrians for the eastern tower and the basement car park.  
**NB:** It may be safer for pedestrians to access the lobby along the eastern side of the lane to avoid having to cross paths with vehicular traffic accessing the car park entry.
- The proposed 'Meriton' signage for the eastern tower is to be reduced in size and further details in relation to the signage dimensions should be provided.

## **1.2 Traffic and Transport**

*"Based on the analysis and amended information submitted by the applicant, the proposed development is not expected to have a significant traffic impact on Church Street and the surrounding road network. The*

*proposal can be supported on traffic & parking grounds subject to the following traffic related conditions".*

In relation to concerns raised by an adjoining property owner a further referral to the Council's Manager and Traffic Services was completed. The following comments were provided:

*Access has changed from the old plans to the new proposal. The new proposal has a ramp from ground level down to the basement and another up to the parking on the mezzanine. These 2 ramps are side by side.*

*The 'dive structure'... (across Council land) or the potential to provide the dive structure is not in the plan.*

*Also, the driveway across the future public square is not shown in the plan. There is potential conflict, but if the driveway and public square are designed well then this can be minimised. The applicant should be required to provide plans for the public domain near the south east corner of the site.*

*The driveways will have a substantial effect on the El Phoenician restaurant. I understand that the restaurant currently uses land that it does not own (at the rear of the property) for parking, loading and pedestrian access. This land is approximately the location of the access to the loading dock and one of the ramps for Meriton. So the restaurant would not be able to park or load in this area. The restaurant may need to reconstruct the rear of its site to provide loading, or transport goods by foot over an extended distance. Note that there is no parking on the Church Street frontage of the property. A shared zone arrangement (subject to RMS approval) may be required at the rear of the restaurant and public domain/ square to maximise safety for pedestrians access the rear of the restaurant.*

*The sight lines to pedestrians for motorists exiting the basement driveway do not comply with AS2890.1 Figure 3.3. The Fire Brigade Booster Connection and Stairs from the basement need to be altered.*

*The security gates and card readers for the Meriton driveways are not shown on the plan. The plans should be amended to show the location of security access arrangements. The current plans may result in situation where there is inadequate sight distance to pedestrians and unsafe pedestrian access. Meriton has a record of non-compliance with Australian Standards in the George Street, Parramatta in this matter. At the George Street location motorists are required to cross to the wrong side of the driveway which results in their being inadequate sight distance to pedestrians on the footpath.*

**Comment:**

The abovementioned conditions and issues are included in the recommendation for the Department of Planning and Infrastructure's

consideration. Please also refer to the Section 2 below for more detailed comment on the sought changes to car parking.

### **1.3 Social Services**

*"Provision of child care in the city is a key amenity for the growth of the city as the working and resident population grows and child care places are, anecdotally at a premium here in the CBD. Our Jubilee Park Centre - the only one close to the CBD has around 400 people on the waiting list. I'm sure this is not all CBD clientele, but still that figure is very significant".*

#### **Comment:**

Please also refer to the Section 2 below for more detailed comment on the sought deletion of the childcare centre.

### **1.4 Land Use**

*I have reviewed the material placed on exhibition by the DP&I only in relation to the draft VPA so my comments (below) are limited to this aspect of the proposal only.*

- The documentation submitted to the DP&I (Annexure 17) includes a draft VPA which appears to be a slightly earlier version than that placed on public exhibition by Council however it does not appear to contain any conflicting elements and is ostensibly the same in terms of the key deliverables and commercial terms of the VPA. This is to be expected as I am aware that the proponent submitted their modification in late June at a time when legal drafting was still being finalised.*

#### **Comment:**

The draft Voluntary Planning Agreement (VPA) is on exhibition from 10 July 2013 until 9 August 2013. As at the date of writing this report no submissions have been received.

## **2. PARRAMATTA CITY COUNCIL'S COMMENT ON SOUGHT CHANGES**

Comments are provided below to each amendment:

### **Amendment**

*Increase the height of the podium by one storey to RL 23.3m, the height of the eastern tower by five storeys to RL 116.3m, and the height of the western tower by 16 storeys to RL 185.1 m.*

### **Council Comment**

The applicable maximum height of the site is 80m. It is noted that the application was subject to a 10% bonus (88m) in accordance with a design competition. The revised height of the eastern tower is 109.3m and the western tower is 177.1m.



Council does not raise issue with the revised height of the development. The proposal does not result in significant additional overshadowing of public open space and residential dwellings due to its CBD location. In addition the tower heights whilst being significant does not manifest into adverse visual bulk. The eastern tower in particular is a slender form with a high degree of architectural merit. It is also noted that the historic view lines from the world heritage listed Parramatta Park precinct are not additionally impacted.

Council development options for the site at 160 Church Street (Aspire) envisage a building in excess of 300m. In this context it is not inconceivable that a development with the proposed heights will be incongruous in the future city skyline.

Due to the height of the development and its potential impacts on flight paths from Bankstown Airport and organisations such as Careflight, it is recommended that the application be referred to the Civil Aviation Safety Authority.

#### **Amendment**

*Add an additional 158 residential apartments to create a total of 378 residential apartments, and the addition of 96 serviced apartments to create a total of 266 serviced apartments.*

#### **Council Comment**

The proposed additional apartments are accommodated in the revised building heights and on the external edges of the revised car parking podium.

The apartments located in the revised tower elements generally maintain the approved floor plates and there is no objection to the amenity outcome for these apartments.

It is noted however that the apartments along the edge of the car parking podium have compromised amenity specifically in relation to natural cross ventilation. This issue may be able to be resolved with the introduction of maisonette apartments or serviced apartments. SEPP 65 recognises that two storey maisonette apartments provide for good natural ventilation. The above suggested design changes are reiterated in the recommendation.

It is also noted that a larger proportion of apartments share a common wall with the podium car parking, it is also recommended that these walls be appropriately acoustically treated.

#### **Amendment**

*Delete 1,152m<sup>2</sup> of retail floor space which will reduce the total retail floor space to 3,201 m<sup>2</sup>.*

#### **Council Comment**

The primary retail uses at the ground floor level are maintained. Whilst Council's Urban Designers have not objected to the provision of a sleeved car park podium and whole sale deletion of commercial premises above the ground floor level, they have requested that the corner element of the podium maintain a commercial/retail edge.

Council Planners have also found that the provision of the some dwellings which sleeve the car park to be inconsistent with the sites CBD location. The site is located on the northern edge of the CBDs core along its most prominent north/south spine. The predominate scale and development pattern of buildings along Church Street are commercial buildings of two storeys in height. In this context the provision of the podium dwellings on Level 1 are inconsistent with the sites CBD location and the traditional scale of commercial development in this portion of Church Street. It is recommended that commercial uses be resinated for Level 1 on this basis. It is noted that this may alter the podium heights to provide for the same amount of levels. The additional height may be partially addressed through a ground floor level which is at grade with Church Street.

The provision of a prominent commercial/retail corner for this site together with reinstatement of Level 1 commercial premises would greatly aid in creating a more balanced mixture of uses for the podium level and be a more appropriate response to the commercial/retail nature of Church Street. The amendment of this corner location to multi level commercial/retail premise(s) forms part of the recommendation.

**NB:** This recommendation would alter applicable car parking rates of the development.

### **Amendment**

*Delete the child care centre on level 3.*

### **Council Comment**

Council's Social Services Department have raised concern with the deletion of the childcare centre as provision of childcare centres are a key factor in the growth of the city due to increasing worker and resident population. It is also noted that Childcare centres are significantly limited within the CBD.

Council have assessed that a development of this size should provide for some form of socially orientated facilities/uses. In this context Council would strongly encourage the retention of the childcare centre for the site.

### **Amendment**

*Create 112 additional car parking spaces to create a total of 709 car parking spaces.*

### **Council Comment**

Council's Traffic and Transport Investigations Engineer has reviewed the proposal and has not raised objection to the modifications, subject to conditions. These conditions are included in the recommendation.

Council's Traffic and Transport Investigations Engineer has however raised concern with the 2 parking spaces at the end of the 29m long blind aisle for each podium level (end of blind aisle running parallel to Church Street). These concerns relate to unacceptable reversing swept paths. Council's Traffic and Transport Investigations Engineer has suggested converting one of the spaces in proximity to these two spaces at each level into a turning area.

Although this condition will result in the loss of 3 car spaces Council's car parking rate is a maximum control and Council does not raise concern with the total amount of car parking spaces on this basis.

#### **Amendment**

*Increase the approved GFA by 17,594m<sup>2</sup> to create a total of 61,711m<sup>2</sup> of GFA.*

#### **Council Comment**

The applicable floor space ratio of the site is 6:1. It is noted that the application was subject to a 10% bonus (6.6:1) in accordance with a design competition. The revised gross floor area (61,711m<sup>2</sup>) associated with the subject modification application results in a floor space ratio of 8:25:1.

Council does not raise issue with the revised floor space ratio of the development. The revised scale of the podium level is not significant and as discussed the overall height of the development and the incorporation of relatively slender tower forms does not generate unreasonable amenity impacts.

#### **Amendment**

*Install high level signage.*

#### **Council Comment**

The signage proposed relates to 'Meriton' wording and logo on all elevations of the serviced apartments (eastern tower). Council requests that this signage be reduced in extent and greater dimension details be provided. This forms part of the recommendation.

### **3. RECOMMENDATION**

Parramatta City Council makes the following recommendations in relation to MP10\_0171 MOD 3 – Section 75W Modification Application for the site known as 330 Church Street, Parramatta:

1. The retail tenancies and associated outdoor areas adjacent to the foreshore area to be lowered to RL6.5.

2. The retail tenancies and associated outdoor areas adjacent to Church Street are to be lowered so that they are generally level with the foot path on Church Street.
3. A more fine grain retail aspect of the development is to be provided along the ground floor of tenancies facing Church Street. Retail frontages should be approximately 6m in width in response to the predominate scale of retail premises on Church Street.
4. The corner element of the podium level (as outlined in the comments from Council's Urban Designers above) is to be converted into a multi storey retail/commercial tenancy(s). In addition it is recommended that commercial uses be resinated for Level 1  
**NB:** This recommendation would alter applicable car parking rates of the development and may alter the podium heights to provide for the same amount of levels. The additional height may be partially addressed through a ground floor level which is at grade with Church Street.
5. To reduce amenity concerns of the apartments which sleeve the podium car park, these apartments should either be serviced apartments or maisonette apartments.
6. Ensure that all balconies comply with the minimum guidelines within SEPP 65's Residential Flat Design Code.
7. Greater activation, visual connectivity of the River fronting retail premises and the adjacent land to be dedicated to Council is to be provided. A sophisticated and high quality landscape design is to be incorporated. This design is to provide for a landscaped outcome which responds to the retail level of RL 6.5 and should minimise wherever possible level differences. A combination of ramps, landings, stairs and planting should integrate the retail edge of the development with the public domain. This area should provide for paved areas and accessible dining opportunities.
8. Additional detail is required in relation to the pedestrian access into the eastern tower as the level differences indicate possible accessibility problems. It is also noted that there may be a pedestrian – vehicular conflict for the pedestrians of the eastern tower and the basement car park.  
**NB:** It may be safer for pedestrians to access the lobby along the eastern side of the lane to avoid having to cross paths with vehicular traffic accessing the car park entry.
9. The dwellings/ apartments which sleeve the podium car park are to be acoustically designed and constructed to meet the requirements of AS 2107 and the Environment Protection Authority's Guidelines for Acoustic Privacy within premises.

10. The signage proposed relates to 'Meriton' wording and logo on all elevations of the serviced apartments (eastern tower). Council requests that this signage be reduced in extent and greater dimension details be provided. This forms part of the recommendation.
11. The Department of Planning of Infrastructure consider the disruption the vehicular entrances have upon the loading, parking and rear pedestrian access to the existing restaurant premises at 328 Church Street, Parramatta. It may be appropriate to require a shared zone arrangement (subject to RMS approval) at the rear of the restaurant and public domain/square to maximise safety for pedestrians accessing the rear of the restaurant.
12. The sight lines for motorists exiting the basement driveway do not comply with AS2890.1 Figure 3.3. The Fire Brigade Booster Connection and stairs from the basement may need to be altered to address this issue.
13. The public square in which the driveway for the development is proposed to run through is to be well designed to mitigate any pedestrian – vehicular conflict. Plans should be provided to the Department of Planning for the public domain area near the south east corner of the site to address this prior to any approval.
14. The plans are recommended to be amended so that security gates and card readers for driveways are shown on the plans.
15. In the event of any approval the Department of Planning and Infrastructure is to ensure the following:
  1. Parking spaces are to be provided in accordance with AS 2890.1, AS2890.2 and AS 2890.6 except for the two parking spaces on each podium level located at the blind aisle (29m long) on the north-western corner of the building, which are to comply with AS 2890.1, AS2890.2 and AS 2890.6. Reversing from these parking spaces is not acceptable unless one of the parking spaces near the aisle is to be converted as a turning area. Details are to be illustrated on plans submitted with the Construction Certificate.  
**Reason:** To comply with Council's parking requirements and Australian Standards.
  2. 36 bicycle spaces/racks are to be provided on-site and used accordingly, as shown on the amended plans (Plan\_Parking Level 01-02; Dwg A098-A099; Issue 7 and 9; 10/5/13).  
**Reason:** To comply with Council's parking requirements.
  3. Prior to the issue of the Construction Certificate, the PCA shall ascertain that any new element in the basement carpark and podium levels not illustrated on the approved plans such as columns, garage doors, fire safety measures and the like do not compromise appropriate manoeuvring and that compliance is maintained with AS

2890.1, AS2890.2 and AS 2890.6. Details are to be illustrated on plans submitted with the construction certificate.

**Reason:** To ensure appropriate vehicular manoeuvring is provided

4. Occupation of any part of the footpath or road at or above (carrying out work, storage of building materials and the like) during construction of the development shall require a Road Occupancy Permit from Council. The applicant is to be required to submit an application for a Road Occupancy Permit through Council's Traffic and Transport Services, prior to carrying out the construction/restoration works.

**Reason:** To ensure proper management of Council assets.

5. Oversize vehicles using local roads require Council's approval. The applicant is to be required to submit an application for an Oversize Vehicle Access Permit through Council's Traffic and Transport Services, prior to driving through local roads within Parramatta LGA.

**Reason:** To ensure maintenance of Council's assets.

6. Prior to the issue of the Occupation Certificate, a convex mirror is to be installed within the ramp access (one near the entry driveway & one at the bottom of the ramp access for each basement level) with its height and location adjusted to allow an exiting driver a full view of the driveway in order to see if another vehicle is coming through.

**Reason:** To ensure safety of drivers.



**Dr. Robert Lang**  
**Chief Executive Officer**  
**Parramatta City Council**

11 July 2013

Your Reference: MP10\_0171 MOD 3  
Our Reference: SYD10/00922 (A4801084)

The Director – Metropolitan and Regional Projects North  
Department of Planning and Infrastructure  
GPO Box 39  
SYDNEY NSW 2001

Attention: Kate McDonald

**SECTION 75W MODIFICATION  
330 CHURCH STREET, PARRAMATTA  
MP10\_0171 MOD3**

Dear Sir/Madam

I refer to your letter dated 2 July 2013 (Department Ref: MP10\_0171 MOD 3), concerning the abovementioned modification which was referred to Roads and Maritime Services (RMS) for comment in accordance with section 75W of the *Environmental Planning and Assessment Act, 1979*.

RMS has reviewed the following modifications to the abovementioned project and has no objections to or requirements for the modifications:

- Increase the height of the podium by one storey to RL 23.3m, the height of the eastern tower by five storeys to RL 116.3m, and the height of the western tower by 16 storeys to RL185.1m;
- Add an additional 158 residential apartments to create a total of 378 residential apartments, and the addition of 96 serviced apartments to create a total of 266 serviced apartments;
- Delete 1,152m<sup>2</sup> of retail floor space which will reduce the total retail floor space to 3, 201m<sup>2</sup>;
- Delete the child care centre on level 3;
- Create 112 additional car parking spaces to create a total of 709 car parking spaces;
- Increase the approved GFA by 17,594m<sup>2</sup> to create a total of 61,711m<sup>2</sup> of GFA; and
- Install high level signage.

Any inquiries can be directed to Dianne Rees by telephone on 8849 2237.

Yours sincerely



Pahee Sellathurai  
Senior Land Use Planner, Transport Planning, Sydney Region  
Roads & Maritime Services

**From:** "FAEGHI, JORDAN" <JORDAN.FAEGHI@sydneywater.com.au>  
**To:** "kate.macdonald@planning.nsw.gov.au" <kate.macdonald@planning.nsw.gov....>  
**Date:** 7/15/2013 11:05 am  
**Subject:** MP10\_171 MOD 3, 330 Church Street, Parramatta

Dear Ms Macdonald,

Thank you for your letter advising Sydney Water about the above development.

Due to the scale and type of development the proponent will be required to gain a Section 73 Certificate, according to the Sydney Water Act 1994. We request that the following is included in the development consent.

**Requirement for a Section 73 Certificate**

Sydney Water will assess the impact of the development when the proponent applies for a Section 73 Certificate. This assessment will enable Sydney Water to specify any works required as a result of the development and to assess if amplification and/or changes to the system are applicable. The proponent must fund any adjustments needed to Sydney Water infrastructure as a result of any development.

The proponent should engage a Water Servicing Coordinator to get a Section 73 Certificate and manage the servicing aspects of the development. The Water Servicing Coordinator will ensure submitted infrastructure designs are sized & configured according to the Water Supply Code of Australia (Sydney Water Edition WSA 03-2002) and the Sewerage Code of Australia (Sydney Water Edition WSA 02-2002).

Sydney Water requests Council to continue to instruct proponents to obtain a Section 73 Certificate from Sydney Water. Details are available from any Sydney Water Customer Centre on 13 20 92 or Sydney Water's website at [www.sydneywater.com.au](http://www.sydneywater.com.au)<<http://www.sydneywater.com.au>>

If you require any further information, please contact the Urban Growth Branch on 02 8849 4649 or e-mail [urbangrowth@sydneywater.com.au](mailto:urbangrowth@sydneywater.com.au)<<mailto:urbangrowth@sydneywater.com.au>>

Regards,

Jordan Faeghi | Student Town Planner  
Urban Growth Strategy | Sydney Water  
Level 7, 1 Smith Street Parramatta NSW 2150  
PO Box 399 Parramatta NSW 2124  
T 8849 4649  
[jordan.faeghi@sydneywater.com.au](mailto:jordan.faeghi@sydneywater.com.au)<<mailto:jordan.faeghi@sydneywater.com.au>> |  
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12 August, 2013

The Director General  
NSW Department of Planning and Infrastructure  
GPO Box 39,  
Sydney NSW 2001

Dear Sir/Madam

**Re: 330 Church Street, Parramatta - Modification to MP 10\_0171 Mixed Use Residential Development; Meriton Apartments**

I refer to the Public Exhibition and Invitation to Comment in relation to the application for modifications to the existing approval for development at 330 Church Street, Parramatta.

It is noted that the modification application is seeking permission for:

- the East Tower to be increased in height by 5 storeys (+ 24.8 metres) i.e. 23% increase
- the West Tower to be increased in height by 16 storeys (+ 59.5 metres) i.e. 50% increase
- building signage to be displayed on the serviced apartment tower.

In my opinion the proposed variations to the existing Development Approval represents a major and significant modification to the original proposal and therefore requires a new Development Application that addresses the full impacts of the proposed development in their entirety and within a single document.

Even if this application fulfils the technical requirements for acceptance, its appearance is otherwise. Its approval, in the eyes of the public, would place serious doubt on the integrity of the NSW's legislative planning process, as it creates a two-stage approval process, with the negative outcomes of the development being presented as a minor alteration to an already approved Development Application.

Regarding the increased height and associated signage I refer you to, Part 2, Development In Parramatta City And The Impact On Old Government House And Domain's World And National Heritage Listed Values Technical Report – Views and Settings (2012). Without close examination it can be easily seen that the proposed modified towers will severely impact the views and setting from Old Government House and the Crescent toward the City and the Kings School, thereby downgrading the value of this world heritage listed site.

I therefore respectfully request that this Modification Application be refused on the basis that it represents a substantive modification to the originally approved Development Application. Should the applicant wish to proceed down this path, a new Development Application should be submitted for the new proposal in all its aspects.

Yours faithfully



Brian Powyer  
17 Burton Avenue  
Northmead 2152

12 August, 2013

The Director General  
NSW Department of Planning and Infrastructure  
GPO Box 39,  
Sydney NSW 2001

RECEIVED

15 AUG 2013

Director-General

Dear Sir/Madam

**Re: 330 Church Street, Parramatta - Modification to MP 10\_0171 Mixed Use Residential Development; Meriton Apartments**

I refer to the Public Exhibition and Invitation to Comment in relation to the application for modifications to the existing approval for development at 330 Church Street, Parramatta.

It is noted that the modification application is seeking permission for:

- the East Tower to be increased in height by 5 storeys (+ 24.8 metres) i.e. 23% increase
- the West Tower to be increased in height by 16 storeys (+ 59.5 metres) i.e. 50% increase
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Even if this application fulfils the technical requirements for acceptance, its appearance is otherwise. Its approval, in the eyes of the public, would place serious doubt on the integrity of the NSW's legislative planning process, as it creates a two-stage approval process, with the negative outcomes of the development being presented as a minor alteration to an already approved Development Application.

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I therefore respectfully request that this Modification Application be refused on the basis that it represents a substantive modification to the originally approved Development Application. Should the applicant wish to proceed down this path, a new Development Application should be submitted for the new proposal in all its aspects.

Yours faithfully

*A.E. Steele* - A.E. Steele

20 Lind Ave

OATLANDS

NSW - 2117

Upper Fort Street, Observatory Hill  
Millers Point, Sydney NSW 2000

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F: +61 02 9252 1264  
[www.nationaltrust.com.au](http://www.nationaltrust.com.au)

12 July, 2013

The Director General,  
NSW Department of Planning and Infrastructure  
GPO Box 39,  
Sydney NSW 2001

RECEIVED  
16 AUG 2013  
Director-General

Dear Sir/Madam

**Re: 330 Church Street, Parramatta - Modification to MP 10\_0171 Mixed Use Residential Development; Meriton Apartments**

We refer to the Public Exhibition and Invitation to Comment in relation to the application for modifications to the existing approval for development on the above site. The proposed Modifications are summarised as:

- Podium increased height by 1 storey (+ 3.1 metres);
- East Tower increased height by 5 storeys (+ 24.8 metres);
- West Tower increased height by 16 storeys (+ 59.5 metres);
- Increase in 17,594 m<sup>2</sup> gross floor area;
- 158 additional residential apartments;
- 96 additional serviced apartments;
- 1,152 m<sup>2</sup> less retail floor space;
- Deleted childcare centre;
- 112 additional car parking spaces; and
- Building signage on the serviced apartment tower.

The Trust notes that this equates to:

- A 33% increase in height over the original podium level;
- A 23% increase in height of the Eastern Tower;
- A 50% increase in height of the Western Tower;
- A 56% increase in the number of serviced apartments;
- A 75% increase in the number of residential apartments; and
- A 19% increase in car parking spaces.

The Trust also notes that this is accompanied by a significant reduction in retail floor space (approximately 60% of the designated 'supermarket' space) and the deletion of the Child Care Centre from the proposal.

In general, the Trust acknowledges that the Meriton proposal for 330 Church St represents a major development for Parramatta, which will be accompanied by both benefits and costs for Parramatta. We have previously expressed our reservations regarding the appropriateness of tower buildings in this part of Parramatta and have concerns regarding the impact of the bulk of these buildings upon the amenity and character of the riverside areas in the vicinity of Lennox Bridge.

In this case, however, the Trust is mostly concerned that this proposed Modification to an existing Development Approval represents a major and significant modification to the original proposal. Where, as set out above, the modification represents in the order of a 50% increase in size and



residential density, we consider that a new development application should be submitted, which examines and addresses the environmental and social impacts of the new proposal in its entirety. At present, the evaluation of these impacts is spread across two complete sets of documents, creating difficulties in compiling and synthesising the outcomes of all the studies and understanding the full impacts of the development proposal.

The Trust understands that the ability to submit applications to modify existing development assessments is allowed for in the planning system. We are concerned, though, that unless clear limits are placed upon this facility, it becomes a loophole to avoid public interest and proper scrutiny, with the potential that an acceptable and approved development proposal is progressively stripped of its public benefit aspects through the "modification" process.

Public benefit aspects are key to community acceptance of property development outcomes, particularly in urban contexts. Whilst the Trust has no information regarding the reasoning behind the removal of the Child Care Centre and the significant reduction in retail accommodation that forms part of this Modification application, the combination of the increase in size, bulk and density with the reduction in the public benefits of the development presents as a highly retrograde proposal compared to the existing development approval.

The Trust is greatly concerned that this appears to be an abuse of NSW's legislative planning process, as it creates a two-stage development approval process, with the negative outcomes of the development packaged as an incremental alteration (after considerable energy and interest has already been expended) to an already approved Development Application. Even if this Modification is claimed to fulfil the technical requirements for acceptance as a complying application, the appearance is otherwise and it has the potential to further bring the planning system (and the NSW Government) into public disrepute.

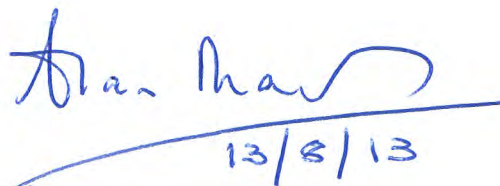
The Trust requests that this Modification Application be refused on the basis that it represents a substantive modification to the originally approved Development Application. Should the applicant wish to proceed down this path, a new Development Application should be submitted for the new proposal in all its aspects.

Yours sincerely,



Graham Quint  
Advocacy Manager

ALAN MARTIN  
5 KOORANA CLOSE  
BAULKHAM HILLS 2153

  
13/8/13

12 August, 2013

The Director General  
NSW Department of Planning and Infrastructure  
GPO Box 39,  
Sydney NSW 2001

RECEIVED

14 AUG 2013

Director-General

Dear Sir/Madam

**Re: 330 Church Street, Parramatta - Modification to MP 10\_0171 Mixed Use Residential Development; Meriton Apartments**

I refer to the Public Exhibition and Invitation to Comment in relation to the application for modifications to the existing approval for development at 330 Church Street, Parramatta.

It is noted that the modification application is seeking permission for:

- the East Tower to be increased in height by 5 storeys (+ 24.8 metres) i.e. 23% increase
- the West Tower to be increased in height by 16 storeys (+ 59.5 metres) i.e. 50% increase
- building signage to be displayed on the serviced apartment tower.

In my opinion the proposed variations to the existing Development Approval represents a major and significant modification to the original proposal and therefore requires a new Development Application that addresses the full impacts of the proposed development in their entirety and within a single document.

Even if this application fulfils the technical requirements for acceptance, its appearance is otherwise. Its approval, in the eyes of the public, would place serious doubt on the integrity of the NSW's legislative planning process, as it creates a two-stage approval process, with the negative outcomes of the development being presented as a minor alteration to an already approved Development Application.

Regarding the increased height and associated signage I refer you to, Part 2, Development In Parramatta City And The Impact On Old Government House And Domain's World And National Heritage Listed Values Technical Report – Views and Settings (2012). Without close examination it can be easily seen that the proposed modified towers will severely impact the views and setting from Old Government House and the Crescent toward the City and the Kings School, thereby downgrading the value of this world heritage listed site.

I therefore respectfully request that this Modification Application be refused on the basis that it represents a substantive modification to the originally approved Development Application. Should the applicant wish to proceed down this path, a new Development Application should be submitted for the new proposal in all its aspects.

Yours faithfully

*Aline Ter Horst*

Aline Ter Horst  
PO Box 53  
OATLANDS  
NSW 2117.

[New South Wales Government](#)

[Department of Planning](#)

[Skip to content](#)

[Home](#) > [Development Assessments](#) > [Major Project Assessments](#)

Andrew Lee , of Pennant Hills NSW , made the following submission on the project:

## [MP 10\\_0171 MOD 3 - Mixed Use Residential Development](#)

---

Supports this project

I think adding height to these buildings is a good decision. Parramatta is striving to become Sydney's CBD and to do so will need as much residential and commercial space as possible.

In addition, together with the 300m+ Aspire development at the other end of the Parra CBD, will provide balance to both sides of the Parra skyline, and will set a precedent for more buildings of similar height to fill up the gap in the middle. Eventually, Parramatta will have skyline easily recognisable from a distance, comparable to the Sydney CBD. This is the first step and I urge you to approve this modification so construction can start as soon as possible.



12 August, 2013

The Director General  
NSW Department of Planning and Infrastructure  
GPO Box 39,  
Sydney NSW 2001

Dear Sir/Madam

**Re: 330 Church Street, Parramatta - Modification to MP 10\_0171 Mixed Use Residential Development; Meriton Apartments**

I refer to the Public Exhibition and Invitation to Comment in relation to the application for modifications to the existing approval for development at 330 Church Street, Parramatta.

It is noted that the modification application is seeking permission for:

- the East Tower to be increased in height by 5 storeys (+ 24.8 metres) i.e. 23% increase
- the West Tower to be increased in height by 16 storeys (+ 59.5 metres) i.e. 50% increase
- building signage to be displayed on the serviced apartment tower.

In my opinion the proposed variations to the existing Development Approval represents a major and significant modification to the original proposal and therefore requires a new Development Application that addresses the full impacts of the proposed development in their entirety and within a single document.

Even if this application fulfils the technical requirements for acceptance, its appearance is otherwise. Its approval, in the eyes of the public, would place serious doubt on the integrity of the NSW's legislative planning process, as it creates a two-stage approval process, with the negative outcomes of the development being presented as a minor alteration to an already approved Development Application.

Regarding the increased height and associated signage I refer you to, Part 2, Development In Parramatta City And The Impact On Old Government House And Domain's World And National Heritage Listed Values Technical Report – Views and Settings (2012). Without close examination it can be easily seen that the proposed modified towers will severely impact the views and setting from Old Government House and the Crescent toward the City and the Kings School, thereby downgrading the value of this world heritage listed site.

I therefore respectfully request that this Modification Application be refused on the basis that it represents a substantive modification to the originally approved Development Application. Should the applicant wish to proceed down this path, a new Development Application should be submitted for the new proposal in all its aspects.

Yours faithfully

---

ASA

Unit 6/5 Mars St  
Epping 2121

RECEIVED

16 AUG 2013

Director-General



12 August, 2013

The Director General  
NSW Department of Planning and Infrastructure  
GPO Box 39,  
Sydney NSW 2001

Dear Sir/Madam

**Re: 330 Church Street, Parramatta - Modification to MP 10\_0171 Mixed Use Residential Development; Meriton Apartments**

I refer to the Public Exhibition and the Invitation to Comment in relation to the application for modifications to the existing approval for development at 330 Church Street, Parramatta.

It is noted that the modification application is seeking permission for:

- the East Tower to be increased in height by 5 storeys (+ 24.8 metres) i.e. 23% increase
- the West Tower to be increased in height by 16 storeys (+ 59.5 metres) i.e. 50% increase
- building signage to be displayed on the serviced apartment tower.

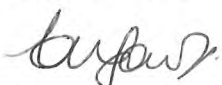
In my opinion, the proposed variations to the existing Development Approval represents a major and significant modification to the original proposal and, therefore, requires a new Development Application that addresses the full impacts of the proposed development in their entirety and within a single document.

Even if this application fulfils the technical requirements for acceptance, its appearance is otherwise. Its approval, in the eyes of the public, would place serious doubt on the integrity of the NSW's legislative planning process, as it creates a two-stage approval process, with the negative outcomes of the development being presented as a minor alteration to an already approved Development Application.

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I, therefore, respectfully request that this Modification Application be refused on the basis that it represents a substantive modification to the originally approved Development Application. I request that **a new Development Application should be submitted for the new proposal in all its aspects.**

Yours faithfully



Catherine M Gow  
19/6 Isabella Street  
North Parramatta NSW 2151  
Ph: 0404 473 186

Kate Macdonald

As there amount to jam  
submissions please note &  
file without reply.

R. A. Amund

14/8

RECEIVED

13 AUG 2013

Director-General

DAS A

[New South Wales Government](#)

[Department of Planning](#)

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[Home](#) > [Development Assessments](#) > [Major Project Assessments](#)

Christopher O'Brien , of Epping NSW, made the following submission on the project:

## [MP 10\\_0171 MOD 3 - Mixed Use Residential Development](#)

---

Objects to this project

15 August, 2013

The Director General  
NSW Department of Planning and Infrastructure  
GPO Box 39,  
Sydney NSW 2001

Dear Sir/Madam

Re: 330 Church Street, Parramatta - Modification to MP 10\_0171 Mixed Use Residential Development; Meriton Apartments

I refer to the Public Exhibition and Invitation to Comment in relation to the application for modifications to the existing approval for development at 330 Church Street, Parramatta.

It is noted that the modification application is seeking permission for:

- \* the East Tower to be increased in height by 5 storeys (+ 24.8 metres) i.e. 23% increase
- \* the West Tower to be increased in height by 16 storeys (+ 59.5 metres) i.e. 50% increase
- \* Deleted childcare centre
- \* building signage to be displayed on the serviced apartment tower.

In my opinion the proposed variations to the existing Development Approval represents a major and significant modification to the original proposal and therefore requires a new Development Application that addresses the full impacts of the proposed development in their entirety and within a single document.

Even if this application fulfils the technical requirements for acceptance, its appearance is otherwise. Its approval, in the eyes of the public, would place serious doubt on the integrity of the NSW's legislative planning process, as it creates a two-stage approval process, with the negative outcomes of the development being presented as a minor alteration to an already approved Development Application.

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I therefore respectfully request that this Modification Application be refused on the basis that it represents a substantive modification to the originally approved Development Application. Should the applicant wish to proceed down this path, a new Development Application should be submitted for the new proposal in all its aspects.

Yours faithfully,  
Chris O'Brien



Heather Watan

Note & file.

This is obviously not  
original correspondence

from the N.T.

R. Hammond  
20/8/13



NATIONAL TRUST

DASA

Upper Fort Street, Observatory Hill  
Millers Point, Sydney NSW 2000

GPO Box 518, Sydney NSW 2001

T: +61 2 02 9258 0123;

F: +61 02 9252 1264

[www.nationaltrust.com.au](http://www.nationaltrust.com.au)

12 July, 2013

The Director General,  
NSW Department of Planning and Infrastructure  
GPO Box 39,  
Sydney NSW 2001

RECEIVED

16 AUG 2013

Director-General

Dear Sir/Madam

**Re: 330 Church Street, Parramatta - Modification to MP 10\_0171 Mixed Use Residential Development; Meriton Apartments**

We refer to the Public Exhibition and Invitation to Comment in relation to the application for modifications to the existing approval for development on the above site. The proposed Modifications are summarised as:

- Podium increased height by 1 storey (+ 3.1 metres);
- East Tower increased height by 5 storeys (+ 24.8 metres);
- West Tower increased height by 16 storeys (+ 59.5 metres);
- Increase in 17,594 m<sup>2</sup> gross floor area;
- 158 additional residential apartments;
- 96 additional serviced apartments;
- 1,152 m<sup>2</sup> less retail floor space;
- Deleted childcare centre;
- 112 additional car parking spaces; and
- Building signage on the serviced apartment tower.

The Trust notes that this equates to:

- A 33% increase in height over the original podium level;
- A 23% increase in height of the Eastern Tower;
- A 50% increase in height of the Western Tower;
- A 56% increase in the number of serviced apartments;
- A 75% increase in the number of residential apartments; and
- A 19% increase in car parking spaces.



The Trust also notes that this is accompanied by a significant reduction in retail floor space (approximately 60% of the designated 'supermarket' space) and the deletion of the Child Care Centre from the proposal.

In general, the Trust acknowledges that the Meriton proposal for 330 Church St represents a major development for Parramatta, which will be accompanied by both benefits and costs for Parramatta. We have previously expressed our reservations regarding the appropriateness of tower buildings in this part of Parramatta and have concerns regarding the impact of the bulk of these buildings upon the amenity and character of the riverside areas in the vicinity of Lennox Bridge.

In this case, however, the Trust is mostly concerned that this proposed Modification to an existing Development Approval represents a major and significant modification to the original proposal. Where, as set out above, the modification represents in the order of a 50% increase in size and

*low*

residential density, we consider that a new development application should be submitted, which examines and addresses the environmental and social impacts of the new proposal in its entirety. At present, the evaluation of these impacts is spread across two complete sets of documents, creating difficulties in compiling and synthesising the outcomes of all the studies and understanding the full impacts of the development proposal.

The Trust understands that the ability to submit applications to modify existing development assessments is allowed for in the planning system. We are concerned, though, that unless clear limits are placed upon this facility, it becomes a loophole to avoid public interest and proper scrutiny, with the potential that an acceptable and approved development proposal is progressively stripped of its public benefit aspects through the "modification" process.

Public benefit aspects are key to community acceptance of property development outcomes, particularly in urban contexts. Whilst the Trust has no information regarding the reasoning behind the removal of the Child Care Centre and the significant reduction in retail accommodation that forms part of this Modification application, the combination of the increase in size, bulk and density with the reduction in the public benefits of the development presents as a highly retrograde proposal compared to the existing development approval.

The Trust is greatly concerned that this appears to be an abuse of NSW's legislative planning process, as it creates a two-stage development approval process, with the negative outcomes of the development packaged as an incremental alteration (after considerable energy and interest has already been expended) to an already approved Development Application. Even if this Modification is claimed to fulfil the technical requirements for acceptance as a complying application, the appearance is otherwise and it has the potential to further bring the planning system (and the NSW Government) into public disrepute.

The Trust requests that this Modification Application be refused on the basis that it represents a substantive modification to the originally approved Development Application. Should the applicant wish to proceed down this path, a new Development Application should be submitted for the new proposal in all its aspects.

Yours sincerely,



Graham Quint  
Advocacy Manager

Mrs. Christine Martin

*C. Martin*

15/8/13

5 Koovana Close

Baulkham Hills 2153

N. S. Wales



DASA

13 August, 2013

The Director General  
NSW Department of Planning and Infrastructure  
GPO Box 39,  
Sydney NSW 2001

RECEIVED

14 AUG 2013

Director-General

Dear Sir/Madam

**Re: 330 Church Street, Parramatta - Modification to MP 10\_0171 Mixed Use Residential Development; Meriton Apartments**

I refer to the Public Exhibition and Invitation to Comment in relation to the application for modifications to the existing approval for development at 330 Church Street, Parramatta.

It is noted that the modification application is seeking permission for:

- the East Tower to be increased in height by 5 storeys (+ 24.8 metres) i.e. 23% increase
- the West Tower to be increased in height by 16 storeys (+ 59.5 metres) i.e. 50% increase
- building signage to be displayed on the serviced apartment tower.


In my opinion the proposed variations to the existing Development Approval represents a major and significant modification to the original proposal and therefore requires a new Development Application that addresses the full impacts of the proposed development in their entirety and within a single document.

Even if this application fulfils the technical requirements for acceptance, its appearance is otherwise. Its approval, in the eyes of the public, would place serious doubt on the integrity of the NSW's legislative planning process, as it creates a two-stage approval process, with the negative outcomes of the development being presented as a minor alteration to an already approved Development Application.

Regarding the increased height and associated signage I refer you to, Part 2, Development In Parramatta City And The Impact On Old Government House And Domain's World And National Heritage Listed Values Technical Report – Views and Settings (2012). Without close examination it can be easily seen that the proposed modified towers will severely impact the views and setting from Old Government House and the Crescent toward the City and the Kings School, thereby downgrading the value of this world heritage listed site.

I therefore respectfully request that this Modification Application be refused on the basis that it represents a substantive modification to the originally approved Development Application. Should the applicant wish to proceed down this path, a new Development Application should be submitted for the new proposal in all its aspects.

Yours faithfully

  
Elizabeth Gregory.

12 August, 2013

DA>A

The Director General  
NSW Department of Planning and Infrastructure  
GPO Box 39,  
Sydney NSW 2001

RECEIVED

14 AUG 2013

Director-General

Dear Sir/Madam

**Re: 330 Church Street, Parramatta - Modification to MP 10\_0171 Mixed Use Residential Development; Meriton Apartments**

I refer to the Public Exhibition and Invitation to Comment in relation to the application for modifications to the existing approval for development at 330 Church Street, Parramatta.

It is noted that the modification application is seeking permission for:

- the East Tower to be increased in height by 5 storeys (+ 24.8 metres) i.e. 23% increase
- the West Tower to be increased in height by 16 storeys (+ 59.5 metres) i.e. 50% increase
- building signage to be displayed on the serviced apartment tower.

In my opinion the proposed variations to the existing Development Approval represents a major and significant modification to the original proposal and therefore requires a new Development Application that addresses the full impacts of the proposed development in their entirety and within a single document.

Even if this application fulfils the technical requirements for acceptance, its appearance is otherwise. Its approval, in the eyes of the public, would place serious doubt on the integrity of the NSW's legislative planning process, as it creates a two-stage approval process, with the negative outcomes of the development being presented as a minor alteration to an already approved Development Application.

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I therefore respectfully request that this Modification Application be refused on the basis that it represents a substantive modification to the originally approved Development Application. Should the applicant wish to proceed down this path, a new Development Application should be submitted for the new proposal in all its aspects.

Yours faithfully

*George Cook J.P.*  
GEORGE COOK  
18 COBBITY ST  
SEVEN HILLS  
2147

*Angela Cook*  
ANGELA COOK  
18 COBBITY STREET  
SEVEN HILLS 2147



DASA

19 / 3 Coleman Ave,  
Carlingford, 2118.  
12 August, 2013

The Director General,  
NSW Department of Planning and Infrastructure,  
GPO Box 39,  
Sydney, NSW, 2001.

RECEIVED

14 AUG 2013

Director-General

Dear Sir/Madam,

**Re: 330 Church Street, Parramatta - Modification to MP 10\_0171 Mixed Use Residential Development; Meriton Apartments**

We refer to the 'Public Exhibition and Invitation to Comment' in relation to the application for modifications to the existing approval for development at 330 Church Street, Parramatta.

We are most concerned to note that the modification application is seeking permission for:

- the East Tower to be increased in height by 5 storeys (+ 24.8 metres) i.e. 23% increase
- the West Tower to be increased in height by 16 storeys (+ 59.5 metres) i.e. 50% increase
- building signage to be displayed on the serviced apartment tower.


In our opinion, the proposed variations to the existing Development Approval represent a major and significant modification to the original proposal and one which is not in keeping with the area. We feel, therefore, that a new Development Application is required - one that addresses the full impact of the proposed development.

The approval of the modification application would place serious doubt on the integrity of the NSW's legislative planning process, as it creates a two-stage approval process, with the negative outcomes of the development being presented as a minor alteration to an already approved Development Application.

Regarding the increased height and associated signage, we refer you to, Part 2, Development In Parramatta City And The Impact On Old Government House And Domain's World And National Heritage Listed Values Technical Report – Views and Settings (2012). It can be seen that the proposed modified towers will severely impact the views and setting from Old Government House and the Crescent toward the City and the Kings School, thereby downgrading the value of this World Heritage listed site.

We therefore respectfully request that this Modification Application be refused on the basis that it represents a substantive modification to the originally approved Development Application. Should the applicant wish to proceed with this modification, a Development Application should be submitted for the new proposal.

Yours faithfully,

 K. Trott

Ian Gilbert and Kristine Trott



12 August, 2013

The Director General  
NSW Department of Planning and Infrastructure  
GPO Box 39,  
Sydney NSW 2001

RECEIVED

14 AUG 2013

Director-General

Dear Sir/Madam

**Re: 330 Church Street, Parramatta - Modification to MP 10\_0171 Mixed Use Residential Development; Meriton Apartments**

I refer to the Public Exhibition and Invitation to Comment in relation to the application for modifications to the existing approval for development at 330 Church Street, Parramatta.

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Even if this application fulfils the technical requirements for acceptance, its appearance is otherwise. Its approval, in the eyes of the public, would place serious doubt on the integrity of the NSW's legislative planning process, as it creates a two-stage approval process, with the negative outcomes of the development being presented as a minor alteration to an already approved Development Application.

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I therefore respectfully request that this Modification Application be refused on the basis that it represents a substantive modification to the originally approved Development Application. Should the applicant wish to proceed down this path, a new Development Application should be submitted for the new proposal in all its aspects.

Yours faithfully

*Ivan & Joan Hamilton*  
*13 Berg St. Blacktown 2148*

*J. Hamilton*  
*Ivan & Joan Hamilton*

10 August, 2013

DASA

The Director General  
NSW Department of Planning and Infrastructure  
GPO Box 39,  
Sydney NSW 2001

RECEIVED

13 AUG 2013

Director-General

Dear Sir/Madam

**Re: 330 Church Street, Parramatta - Modification to MP 10\_0171 Mixed Use Residential Development; Meriton Apartments**

I refer to the Public Exhibition and Invitation to Comment in relation to the application for modifications to the existing approval for development at 330 Church Street, Parramatta.

It is noted that the modification application is seeking permission for:

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I therefore respectfully request that this Modification Application be refused on the basis that it represents a substantive modification to the originally approved Development Application. Should the applicant wish to proceed down this path, a new Development Application should be submitted for the new proposal in all its aspects.

Yours faithfully

*Jeanette Cohen*

Jeanette Cohen

15 Kingsford St

BLACKTOWN NSW 2148



10 August, 2013

DASA

The Director General  
NSW Department of Planning and Infrastructure  
GPO Box 39,  
Sydney NSW 2001

RECEIVED

13 AUG 2013

Director-General

Dear Sir/Madam

**Re: 330 Church Street, Parramatta - Modification to MP 10\_0171 Mixed Use Residential Development; Meriton Apartments**

I refer to the Public Exhibition and Invitation to Comment in relation to the application for modifications to the existing approval for development at 330 Church Street, Parramatta.

It is noted that the modification application is seeking permission for:

- the East Tower to be increased in height by 5 storeys (+ 24.8 metres) i.e. 23% increase
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I therefore respectfully request that this Modification Application be refused on the basis that it represents a substantive modification to the originally approved Development Application. Should the applicant wish to proceed down this path, a new Development Application should be submitted for the new proposal in all its aspects.

Yours faithfully

*Jeanette Cohen*

Jeanette Cohen

15 Kingsford St

BLACKTOWN NSW 2148

The Director General  
NSW Department of Planning and Infrastructure  
GPO Box 39  
Sydney NSW 2001

DASA

RECEIVED

13 AUG 2013

Director-General

Re: 330 Church Street Parramatta  
Modification to MP 10\_0171 Mixed Use Residential Development:  
Meriton Apartments

Thank you for the opportunity to comment on the proposed modification to existing approval for the development at 330 Church Street Parramatta.  
Like so many approvals this application is seeking to modify a development far beyond what would be considered a reasonable percentage.

In this instance, 330 Church Street Parramatta, the following changes have been identified:

- east tower increase in height by 5 storeys (+ 24.8 metres) or 23 %
- west tower increase in height by 16 storeys (+ 59.5 metres) or 50%

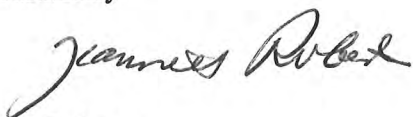
I would think 5% maybe up to 10% modification would be within a reasonable range. Anything beyond this percentage represents a significantly change to what was the original intention of the applicant. This changed application with, hopefully, emergency and other safety aspects fully reviewed, is a considerably higher-rise building that the developer originally planned to build.

MP 10\_0171 Mixed Use Residential Development: Meriton Apartments, really needs to submit a new development application that needs to be re-examined by groups concerned with the streetscape/landscape of Parramatta – its impact and heritage. As I believe the original application did rely on a degree of support from local, state, national and world heritage bodies and others interested in the unique position that Parramatta holds in our early history.

I conclude my objection with the request that this modification application be refused as it notes changes far beyond what was originally approved (as given above). A new Development Application should be called, showing:

- all new proposed modifications
- relevant emergency and safety aspects are closely checked and
- peak bodies and heritage groups views included in final decision.

Yours faithfully



Jeannette Roberts  
10 Moseley Street  
Carlingford NSW 2118

12 August 2013

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[Department of Planning](#)

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Jennie Minifie , of North Ryde NSW , made the following submission on the project:

## [MP 10\\_0171 MOD 3 - Mixed Use Residential Development](#)

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### Objects to this project

PO Box 6116

North Ryde NSW 2113

15 August, 2013

The Director General NSW Department of Planning and Infrastructure GPO Box 39,  
Sydney NSW 2001

Dear Sir/Madam

Re: 330 Church Street, Parramatta - Modification to MP 10\_0171 Mixed Use Residential Development; Meriton Apartments

I wish to object to the application for variation of the existing approval for development at 330 Church Street, Parramatta which includes the following departures from the approved development.

&#61623; the East Tower to be increased in height by 5 storeys (+ 24.8 metres) i.e. 23% increase

&#61623; the West Tower to be increased in height by 16 storeys (+ 59.5 metres) i.e. 50% increase

&#61623; building signage to be displayed on the serviced apartment tower.

The proposed variations to the existing development approval include major modifications to the original proposal which are of such a significant scale and potential impact that a new development application is required to fully address the potential impacts of the proposed development in their entirety and within a single document.

The Department of Planning & Infrastructure should reject the new proposal as a variation of the original consent as the proposed increase in height and floor space and proposed signage will have an adverse potential impact on the historic town centre of Parramatta and the unique historic precinct along the Parramatta River, including world heritage listed Old Government House and Domain.

The proposed modification of the towers and the proposed signage will severely impact upon heritage significance of the visual catchment of Old Government House and views from the Crescent toward the Kings School, and the town centre. Old Government House is one of the most important buildings in Australia as it dates from the earliest years of the NSW colony. It has to date retained a unique ambience and visual setting through the efforts of the National Trust, the community and those Federal, State and Local Government authorities which have worked over many years to protect the heritage of Parramatta from unsympathetic and intrusive development.

Technical guidance is provided in "Development In Parramatta City And The Impact On Old Government House And Domain's World And National Heritage Listed Values Technical Report - Views and Settings (2012) Part 2 on the specific controls on future development in the visual

catchment of Old Government House and Domain. All future development should adopt



the recommended development restrictions in the report.

It is impossible to imagine any other city in the world which would be prepared to destroy the setting of one of the most historic buildings. Whether it is the White House in Washington, the Arc de Triomphe and the Louvre in Paris, the Opera House in Sydney, and many more heritage buildings, the scale of development permitted in those visual catchments is never permitted to dominate or tower over the historic buildings and structures.

The proposed increase in height and scale now proposed for this development is of such an excessive scale that it will permanently damage the heritage value of the simple Georgian style of buildings that give Parramatta a unique and pleasing scale and character. All levels of Government should ensure that future development in Parramatta Town centre respects our Australian heritage.

I therefore believe that the application for proposed variation of consent should be refused having regard to the proposed substantive increase in the height and scale of the approved development and the potential severe impacts of the proposed variation and the associated signage on the cultural significance of Old Government House and Domain, the historic Parramatta River precinct, and the scale and character of the historic town centre.

Yours sincerely,  
Jennie Minifie.

12 August, 2013

The Director General  
NSW Department of Planning and Infrastructure  
GPO Box 39,  
Sydney NSW 2001

RECEIVED  
16 AUG 2013  
Director-General

Dear Sir/Madam

**Re: 330 Church Street, Parramatta - Modification to MP 10\_0171 Mixed Use Residential Development; Meriton Apartments**

I refer to the Public Exhibition and Invitation to Comment in relation to the application for modifications to the existing approval for development at 330 Church Street, Parramatta.

It is noted that the modification application is seeking permission for:

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- building signage to be displayed on the serviced apartment tower.

In my opinion the proposed variations to the existing Development Approval represents a major and significant modification to the original proposal and therefore requires a new Development Application that addresses the full impacts of the proposed development in their entirety and within a single document.

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Yours faithfully



KERRIE CAI

17/38-42 WYNWARD ST

GUILDFORD NSW 2161

DASA

10 August, 2013

The Director General  
NSW Department of Planning and Infrastructure  
GPO Box 39,  
Sydney NSW 2001

RECEIVED

14 AUG 2013

Director-General

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Yours faithfully

*Les Ted*  
48 Bricketwood Dr  
Woodcroft 2767

12.8.2013



14 August, 2013

Mrs. Dorothy Warwick  
29 Cardigan Street  
Guildford NSW 2161

The Director General  
NSW Department of Planning and Infrastructure  
GPO Box 39,  
Sydney NSW 2001

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10 August, 2013

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NSW Department of Planning and Infrastructure  
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Sydney NSW 2001

10/8/2013

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Yours faithfully

*Lyn M Tod*  
LYNETTE MARGARET TOD  
48 BRICKETWOOD DR.  
WOODCROFT NSW 2767



12 August, 2013

The Director General  
NSW Department of Planning and Infrastructure  
GPO Box 39,  
Sydney NSW 2001

RECEIVED

18 AUG 2013

Director-General

Dear Sir/Madam

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Yours faithfully

*Lynette Case*

12 August, 2013

8 Yawung Ave  
Baulkham Hills 2153

The Director General  
NSW Department of Planning and Infrastructure  
GPO Box 39,  
Sydney NSW 2001

RECEIVED

14 AUG 2013

Director-General

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Yours faithfully



Margaret Neyle



12 August, 2013

RECEIVED  
15 AUG 2013  
DASA  
Director-General

The Director General  
NSW Department of Planning and Infrastructure  
GPO Box 39,  
SYDNEY NSW 2001

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Yours faithfully



Maureen V Finigan  
4/14-16 Helen Street  
WESTMEAD NSW 2145  
Ph: 02 9893 7634

RECEIVED

14 AUG 2013

Director-General

17 Churchill Drive,  
Winston Hills NSW 2153.  
12<sup>th</sup> August 2013.

The Director General  
NSW Department of Planning and Infrastructure  
GPO Box 39,  
Sydney NSW 2001

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Yours faithfully,



Moira L. Wilkinson



RECEIVED

14 AUG 2013

Director-General

DASA

17 Churchill Drive,  
Winston Hills NSW 2153.  
12<sup>th</sup>. August 2013.

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NSW Department of Planning and Infrastructure  
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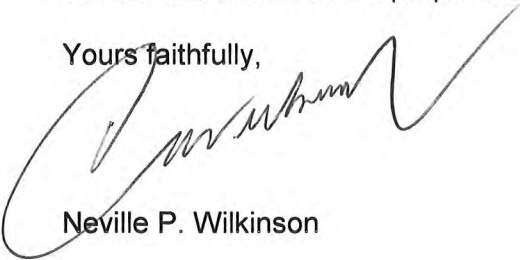
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Yours faithfully,



Neville P. Wilkinson

[New South Wales Government](#)

[Department of Planning](#)

[Skip to content](#)

[Home](#) > [Development Assessments](#) > [Major Project Assessments](#)

Pamela Coleman , of Parramatta NSW , made the following submission on the project:

## [MP 10\\_0171 MOD 3 - Mixed Use Residential Development](#)

---

Objects to this project

15 August, 2013

The Director General &#8232;NSW Department of Planning and Infrastructure  
&#8232;GPO Box 39, &#8232;Sydney NSW 2001

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Yours faithfully

Pamela Coleman  
35/1 Palmer Street  
Parramatta NSW 2150

[New South Wales Government](#)

[Department of Planning](#)

[Skip to content](#)

[Home](#) > [Development Assessments](#) > [Major Project Assessments](#)

PETER FERGUSSON , of Eastwood NSW, made the following submission on the project:

## [MP 10\\_0171 MOD 3 - Mixed Use Residential Development](#)

---

Objects to this project

12 August, 2013

The Director General  
NSW Department of Planning and Infrastructure  
GPO Box 39,  
Sydney NSW 2001

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Yours faithfully

Peter Fergusson  
2/6 Lovell Rd  
Eastwood, 2122

12 August, 2013

8/5 Kandy Avenue  
EPPING  
NSW 2121

DA-A

The Director General  
NSW Department of Planning and Infrastructure  
GPO Box 39,  
Sydney NSW 2001

RECEIVED

13 AUG 2013

Director-General

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Yours faithfully





1 August 2013

Department of Planning and Infrastructure

Attention – Heather Warton  
Director  
Metropolitan and Regional Projects North

Dear Heather,

**Re: 330 Church St, Parramatta – MP10\_0171 MOD 3**

I write on behalf of Two-Dad Pty Limited who are the owners of No.328 Church St, Parramatta and Jag Points Group Pty Limited who are the owners of the El-Phoenician Restaurant operating on the same land.

It is noted that my clients property is immediately adjacent the southern boundary of 330 Church St, Parramatta. A successful and long established restaurant operates at No.328 Church St, which has a minimum of 500 people entering and exiting the premises from the rear per week. The site benefits from direct frontage to Church Street, however the rear of the restaurant is accessible to patrons from David Fraser Reserve, where there is existing public parking. The rear access point, also provides an important point for delivery and services to the restaurant. Accordingly, any short term disruption or long term impact on the workability and functionality of the rear access to the site is of significant commercial interest and concern to the owners of the site.

There is no in principle objection to the amendment of the application in relation to increased residential yield. However, significant concern is expressed in relation to: -

- the proposed rearrangement of the ground floor entry and exit points;
- the size and location of the loading dock and driveway;
- any increase in carparking that results in a poor access arrangement to the site; and
- the substantial reduction in ground floor retail floor space and resulting decrease in activation of the southern and southeastern frontages and surrounds.

Irrespective of the use of No.328 Church St as an ongoing restaurant, or whether a pedestrian laneway (as identified by Council in the Parramatta City Centre DCP 2007), the concerns expressed in this submission are equally valid and relevant.

The above objections to the proposal are discussed in greater detail in turn below.

## **1. Entry and Exit Arrangements (Vehicular and Pedestrian)**

The allocation of floor space above ground level for carparking purposes has led to an amended entry and exist configuration at the ground floor. The amendment necessitates ramps to now descend and ascend to parking areas. Rather than retain the existing entry and exit arrangements to the site and handle the revised traffic movements fully within the site, the application proposes to significantly increase the width of the parking entry points by making both the ascending and descending ramps commence at the site boundary. This results in a significant increase in the area of the site dedicated to traffic movements and reduction in the area of the site that could be activated following the implementation of the pedestrian link in accordance with the DCP.

The amended proposal also seeks to relocate the lobby entrance to the serviced apartments so that directly fronts the rear access point and the right of way that will be used by all residents vehicles, all commercial and retail vehicles and all loading and garbage vehicles.

The key concerns with the above amended design are as follows –

- a) Increase in pedestrian and vehicular conflict due to additional car access point and broadening of car and truck movements further to the west and immediately adjacent the entrance point to the restaurant at No.328 and the redesigned lobby entrance to the serviced apartments.
- b) Diminished pedestrian amenity and reduction in safety for pedestrians accessing the restaurant or serviced apartments.
- c) Reduced amenity and functionality for the restaurant (or future pedestrian link) due to expanded vehicle movement area and associated noise emissions.
- d) The location of the proposed loading dock entirely prohibits the opportunity for loading or unloading at the rear of the restaurant, without impeding the access to the loading dock.
- e) It is apparent that little consideration has been given to managing the ascending and descending vehicle movements within the site. Rather the traffic movements and parking arrangements within the site are to have a knock on effect in the way that the building presents to the rear access point to the south and surrounds. It is strongly submitted that the existing arrangements for a single vehicle entry point and a single loading dock can be retained through a better design that manages internal vehicle movements within the site. The significant reduction in commercial/retail floor space on the ground floor and its allocation to uses not previously proposed on the ground floor (such as loading, laundry, dirty linen, staff room and furniture store) is evidence that there is opportunity to manage ascending and descending ramps within the building footprint, and not impact on the presentation to the rear public circulation space.



- f) The Traffic Report submitted with the application is limited in its scope and detail. Discussion is generally limited to parking rates and traffic generation. The Traffic Report fails to adequately address the functionality and useability of the spaces dedicated to car and truck movements; does not deal with vehicular and pedestrian conflicts and hazard management; and fails to establish that there is any demand for the significantly increased truck movement areas, particularly when there is reduced commercial and retail floor space.

## **2. Loading Dock**

The loading dock has been substantially increased in area (notwithstanding substantial reductions in commercial / retail floor space) and relocated to a point further within the site and therefore more distant from the vehicle circulation area at the rear.

The increased loading dock area does not correspond with an increased need given the reduced commercial floor space and appears to be a convenient method of being able to reconfigure FSR. No objection is raised to the increase in FSR, however, the increased loading dock area is not necessary, nor an appropriate way to adjust FSR rates.

Of greatest concern to my client is that the loading dock permits more than 1 large truck to be present on site at any one time. We are concerned that there is likely to be increased noise associated with movements and trucks idling and that the location immediately adjacent the rear of the restaurant is entirely inappropriate.

## **3. Activation**

The approved scheme appropriately located the vehicular points in close proximity to the vehicular circulation points (laneway) and preserved, as much as was practically possible, the activation potential of the future pedestrian laneway. This in turn preserved the existing amenity of the rear access to the restaurant at No.328.

Additionally, should No.328 ever be acquired and converted to a pedestrian laneway, the ground floor supermarket was capable of becoming an active frontage to the laneway through the introduction of openings in the wall.

The proposed modification will result in over 50% of the southern side of the building to lack activation or the potential to be converted to activation in the future. The loading dock is excessive in size and unnecessarily reduces the activation potential.

It is noted that the modification is entirely free of any rigorous urban design analysis of the relationship of the ground floor with rear laneway, the existing

restaurant or the future pedestrian laneway. Such analysis should consider the aesthetic presentation of the southern side of the building along with a discussion of pedestrian movements, safety and the way in which the shared zone can be managed.

We trust that the objections raised in this letter will be fully considered and that amendments to the scheme will occur to ensure that the ground floor relationship of the proposal to the rear circulation space, the restaurant at No.328 and the future pedestrian connection point is improved and looks at the long term workability of the scheme in this significant location.

Please don't hesitate to contact me to discuss any of the matters in this letter on 0419 288 899 or [adam@thinkplanners.com.au](mailto:adam@thinkplanners.com.au).

Regards,

Adam Byrnes- Director  
**Think Planners Pty Ltd**

12 August, 2013

The Director General  
NSW Department of Planning and Infrastructure  
GPO Box 39,  
Sydney NSW 2001

RECEIVED  
16 AUG 2013  
Director-General

Dear Sir/Madam

**Re: 330 Church Street, Parramatta - Modification to MP 10\_0171 Mixed Use Residential Development; Meriton Apartments**

I refer to the Public Exhibition and Invitation to Comment in relation to the application for modifications to the existing approval for development at 330 Church Street, Parramatta.

It is noted that the modification application is seeking permission for:

- the East Tower to be increased in height by 5 storeys (+ 24.8 metres) i.e. 23% increase
- the West Tower to be increased in height by 16 storeys (+ 59.5 metres) i.e. 50% increase
- building signage to be displayed on the serviced apartment tower.

In my opinion the proposed variations to the existing Development Approval represents a major and significant modification to the original proposal and therefore requires a new Development Application that addresses the full impacts of the proposed development in their entirety and within a single document.

Even if this application fulfils the technical requirements for acceptance, its appearance is otherwise. Its approval, in the eyes of the public, would place serious doubt on the integrity of the NSW's legislative planning process, as it creates a two-stage approval process, with the negative outcomes of the development being presented as a minor alteration to an already approved Development Application.

Regarding the increased height and associated signage I refer you to, Part 2, Development In Parramatta City And The Impact On Old Government House And Domain's World And National Heritage Listed Values Technical Report – Views and Settings (2012). Without close examination it can be easily seen that the proposed modified towers will severely impact the views and setting from Old Government House and the Crescent toward the City and the Kings School, thereby downgrading the value of this world heritage listed site.

I therefore respectfully request that this Modification Application be refused on the basis that it represents a substantive modification to the originally approved Development Application. Should the applicant wish to proceed down this path, a new Development Application should be submitted for the new proposal in all its aspects.

Yours faithfully



MRS. WENDY D WALKER.  
6 YAWUNG AVENUE,  
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NSW 2153.