

10 March 2025 (Endorsed by Council)

CITY OF PARRAMATTA COUNCIL SUBMISSION ON THE PARRAMATTA NORTH REZONING PROPOSAL

Executive Summary

Council recognises several positive aspects arising from the Parramatta North Rezoning Proposal ('the proposal') being led by Property and Development NSW (PDNSW). The provision of jobs accompanied by additional housing within an identified local centre is supported, while providing an opportunity for a major new tertiary education campus consistent with the Westmead Place Strategy and Council's Local Strategic Planning Statement (LSPS). Despite these positive aspects of the proposal, Council has several areas of concerns that are broadly captured across four key themes:

1. **Requirement for commercial and educational uses (jobs):** Council supports, in principle, a balance of residential, mixed-use (commercial) and educational uses on the site. However, there is concern for a lack of a mechanism to secure a minimum amount of commercial and educational floor area. To achieve the proposed 12,000 jobs target consistent with the LSPS and Westmead Place Strategy, it is crucial that the amending planning instrument include minimum commercial and educational floor area provisions, and land zoning that closely aligns with the Structure Plan. In this regard, Council firmly seeks to ensure that the 'housing crisis of today' does not become the 'jobs crisis of tomorrow', and therefore it is paramount that land that has been identified to provide future commercial floor area and jobs is unequivocally protected.
2. **Securing supporting infrastructure:** Sufficient provision of supporting infrastructure including affordable housing is crucial to the project's success. While it is appreciated that infrastructure is proposed to support the incoming population, this does not negate the requirement for contributions towards broader community assets, of which the incoming population will utilise and place additional demand upon. The proposed exemption or offset of s7.11 local development contributions is therefore not supported due to the backlog of local infrastructure needed to service the area. Further details are sought on the proposed 25,000 student population, and whether this student population has been factored into the infrastructure demand analysis. Although infrastructure is not proposed to be dedicated to Council (and Council is supportive of this), to secure terms related to community access and ongoing maintenance (the latter being the responsibility of the State Government), a Deed of Agreement must be entered into with Council.
3. **Heritage, Design and Environment:** Council acknowledges the revised planning controls resulting in a reduction in density proximate to the Parramatta Female Factory in response to a potential World Heritage listing by the United Nations Educational, Scientific and Cultural Organisation (UNESCO). Council considers that further interrogation of building envelope configurations, street layouts and rationalisation of the proposed floor space ratio (FSR) and height of building standards will provide increased protection of the heritage values of Parramatta North.

4. **Traffic, Transport and Accessibility:** Although residents, workers and students within and outside of Parramatta North should be encouraged to utilise public transport options, this is not always practical. The incoming population (including the proposed 25,000 students) will result in increased demand upon road infrastructure both within and outside of Parramatta North. Road and intersection upgrades will be required as a direct result of this proposal and buildings should not be occupied until these upgrades are completed and Parramatta Light Rail Stage 2 (PLR2) is operational.

Council's comments are provided to signify our commitment to a balanced approach in development that maximises the potential of Parramatta North as an employment-generating, heritage significant and culturally vibrant destination for the broader Sydney community.

Key Opportunities

Council's *Parramatta 2050* vision, which was adopted by Council on 12 August 2024, identifies Parramatta North as part of the Health and Innovation District comprising Parramatta North and Westmead that will:

- Bolster the precinct as a world leader in health, technology, clinical research, and wellbeing, including an opportunity for a significant new university campus – a 'knowledge' city.
- Become a place immersed in innovation, culture and creativity – innovation meets heritage.
- Be an economic powerhouse and the cornerstone of a globally renowned knowledge corridor. Council maintains an advocacy position for at least 50,000 total jobs within the Health and Innovation Precinct by 2036 (almost doubling current number of jobs). There is also a commitment to establishing a further jobs target for 2050 with a focus on health research and education.

Recognising these key attributes, Council raises several issues with the exhibited documentation explained under four themes below.

Theme 1: Securing minimum commercial and education floor area (jobs)

The proposal seeks to deliver approximately 12,000 new jobs by 2047, approximately 2,000 new homes, and a new university campus for approximately 25,000 students. The proposed Structure Plan delineates various mixed-use precincts (residential and enterprise) and community/arts/culture precincts. In discussions with PDNSW, it is understood that the eastern side of the precinct will entirely comprise the proposed 2,000 new dwellings and the western side of the precinct has not been factored into this figure. Given the proposed MU1 Mixed Use zoning, there is the potential for future residential development to occur throughout the precinct. It is noted that whilst the current zoning is largely already MU1 Mixed Use, the western side of the precinct is currently zoned SP2 Health Services Facility.

Council supports, in principle, the proposed Structure Plan that illustrates a balance of residential, mixed-use (commercial) and educational uses, however, opposes the broad application of the proposed MU1 Mixed Use zoning, which permits various types of residential accommodation, without a mechanism to secure a minimum amount of commercial and educational floor area. Although residential development is considered necessary to help activate Parramatta North, residential development should not come at the expense of commercial/educational floor area. Council is already exceeding housing targets set by the State Government, and it is therefore crucial

to achieve the right balance between jobs and housing to ensure the proposed Health and Innovation Precinct can be realised.

Given that Parramatta North is required to primarily contribute to jobs targets, it is clearly not the intention of the proposal to entirely comprise residential development. It is crucial that Parramatta North is protected to secure future jobs as part of becoming a leading Health and Innovation District. To achieve this, it is critical that a minimum commercial floor area is secured through a planning provision. Council does not support any residential uses to be considered as part of this minimum commercial floor area, including Build-to-Rent. Built-to-Rent poses a significant threat to commercial land, which must be protected to ensure jobs are secured to serve both current and future residential development, particularly noting the State Government's priority to deliver additional housing. In this regard, Council firmly seeks to ensure that the 'housing crisis of today' does not become the 'jobs crisis of tomorrow', and therefore it is paramount that land that has been identified to provide future commercial floor area and jobs is unequivocally protected.

Clarification is sought regarding the forecasted number of jobs for the finance sector as a result of the proposal (up to 2,559 jobs according to the Economic Impact Assessment (EIA)), which PDNSW have advised is derived by extrapolating current employment figures in the Finance and Insurance sector in this area of the City. This methodology is not supported as it does not take into account sector-specific needs or comparative advantage of this location compared to – for instance – the nearby Parramatta CBD for this sector.

The EIA also does not appear to acknowledge or measure the impact that cultural and creative industries may have in terms of economic output, value-add, and employment generation. Given Parramatta North's historical significance, existing heritage-built form, and proposed level of investment, cultural, artistic, and creative industry uses are likely to occur within the precinct, warranting further investigation and assessment.

Theme 1 Recommendations

1. Include a planning provision within the new or amending State Environmental Planning Policy (SEPP) (i.e. not a DCP-level control) that establishes a minimum commercial and educational floorspace requirement to ensure the 12,000 jobs target is met. This planning provision must explicitly exclude any residential accommodation from being able to contribute to this minimum, such as Build-to-Rent.
2. Include zoning that more closely aligns with the intent of the Structure Plan (i.e. a mixture of MU1 Mixed Use, E1 Local Centre, SP1 Special Activities/SP2 Infrastructure).
3. That the economic analysis takes into account comparative advantage of Parramatta North, sector-specific location needs and other trends to understand how economic development opportunities can be maximised, with consideration of cultural and creative industries.

Theme 2: Securing supporting infrastructure

Generated Infrastructure Demand

The proposal will increase the number of residents, workers, and students living in and visiting Parramatta North, placing additional demand on existing infrastructure within and outside of the precinct. It is essential that appropriate infrastructure for community use be secured including community facilities, open space, recreation facilities, affordable housing and schools.

Additional details are required regarding the proposed uses of the 300,000 sqm non-residential floor area and the proposed 25,000 student population. Clarification is sought regarding whether the 25,000 students would be solely accommodated in the eastern side of the precinct or whether a portion of the 300,000 sqm non-residential floorspace in the western side of the precinct is intended for student housing (it is also unclear whether the student population has been factored into the infrastructure demand analysis). Delivering housing (e.g. student housing, build-to-rent) at the expense of commercial floor area is not supported.

School Provision

Regarding provision of educational infrastructure, Council supports the recommendation of the Community Infrastructure Needs Assessment, specifically that PDNSW continue consultation with the NSW Department of Education and Schools Infrastructure NSW regarding the capacity of nearby primary and high schools, as well as primary school Outside School Hour Care services. This consultation is crucial to ensure the incoming population of school-aged children have adequate access to available school places, aligned to development staging. Council also seeks confirmation that childcare centre needs for the incoming population have been considered. Previous studies identified this as a requirement for Parramatta North, however it is currently not listed for delivery.

NSW State Emergency Service

At present, the NSW State Emergency Service (SES) Parramatta Unit is located in the northern part of Parramatta North near the confluence of Parramatta River and Darling Mills Creek. The SES provides a critical function in protecting the community and assets during times of emergency and maintaining this service in this area is vital given its proximity to the Westmead Hospital Precinct and the surrounding high-density development proposed for the immediate area. The SES Unit must be retained permanently within Parramatta North, or an alternate site must be provided within the surrounding area to ensure this essential service can still be provided on flood-free land, at no cost to Council.

Retail Provision

It is unclear whether the impact that students and non-worker visitors will have on retail demand, as well as the floorspace required to adequately satisfy such demand, has been factored into the retail analysis. The proposed zoning is MU1 Mixed Use and RE1 Public Recreation only, which does not reflect any intent for designated retail uses (refer to Theme 1 above). Council requests the designation of a retail precinct and commensurate zoning.

Infrastructure and Land Tenure

Council's position is for infrastructure assets to remain in State Government ownership, along with all management and maintenance obligations. Notwithstanding, to ensure the assets are functional, fit for purpose and meet the diverse needs of the future population, it is recommended that assets

be delivered and maintained in accordance with Council standards and be consistent with Council's adopted *Community Infrastructure Strategy 2020* (CIS).

A Deed of Agreement between Council and the State Government is required to be entered into with the intent of securing public access to public open space areas 24/7 (easements on Title), and that this access is provided in perpetuity. The agreement should also include terms and conditions regarding the lease/hire of community building and facilities and minimum maintenance standards to ensure ongoing functionality is maintained for community use. Council would seek agreement that ownership shall never be vested to Council under any circumstance other than at Council's sole request.

As the riverfront 'regional' open space and open space provided in area OS5 will form an extension to Parramatta Park, Council would be supportive of the transfer of management to the Greater Sydney Parklands. A key benefit is the contiguous management of the habitat of the significant flying fox colony located in Parramatta Park.

PDNSW have proposed a Planning Agreement to facilitate their request for an offset to developer contributions for infrastructure work. Council does not support the exemption or offset of s7.11 contributions. Should DPHI decide to support any exemption or offset, further details are required to determine the actual works value and deliverables. High level cost estimated have been provided to Council, however these are unsupported by a quantity surveyors report, appear to duplicate some deliverables and includes matters that Council would exclude from any such Planning Agreement. For clarity, works associated with development, or that are derived as a direct result of the development, are excluded. Additionally, it is unreasonable for the community to be burdened with the costs of refurbishing heritage buildings that have been left in various stages of repair; these works should be at the sole cost of the developer.

Developer Contributions

It is noted that UrbanGrowth NSW, in earlier discussions with Council, confirmed they would not seek exemption or offset from developer contributions. Contribution funds were to be utilised for the delivery of infrastructure assets outside those to be delivered as part of the local Planning Agreement, such as the delivery of a childcare centre and upgrades to district level open space outside Parramatta North. The cause for deviation from this previously agreed matter is unclear. Council requires that PDNSW honour this previous undertaking.

The provision of any infrastructure within Parramatta North does not remove the requirement for contributions towards broader community assets given that the incoming population will utilise and place demand on these items. The expectation that this infrastructure will cater to future residents' needs without contributing to an infrastructure contributions fund is inequitable. Additionally, the proposed works are items not identified in Council's CIS.

Additional infrastructure works, such as park and sports field upgrades, acquisition of new open space and new indoor sports courts, have been identified in the City of Parramatta (Outside CBD) Development Contributions Plan 2021 for North Parramatta and adjoining suburbs. These works will benefit the incoming residents and have a total estimated value of \$188M. Exempting s7.11 contributions would see the delivery of this supporting infrastructure delayed and place additional, unplanned pressure on existing facilities. Such exemptions defeat the purpose of the contribution system and will leave a significant funding gap in contributions for these infrastructure items that the incoming population will seek to access.

Council does not support the exemption or offset of s7.11 contributions; this aligns with current practice and recently endorsed and negotiated Planning Agreements. If the Department of Planning Housing and Infrastructure (DPHI) decide to exempt or offset contributions, this should be limited to the 2,000 dwellings as envisioned in the Structure Plan. This would enable development contributions to be captured if additional dwellings are proposed in subsequent Planning Proposals or Development Applications. These funds would be utilised to help meet the infrastructure needs of any future additional incoming population.

Should DPHI decide to exempt or offset contributions, more detail of the deliverables is required to be provided to Council to determine values. The documentation does not articulate in adequate detail the proposed deliverables to be constructed and delivered for each infrastructure works item including a detailed scope of works, costing breakdown, and concept design. The infrastructure works should demonstrate alignment with Council plans, policies and industry best practice.

Affordable Housing

The Explanation of Intended Effect (EIE) states that PDNSW are investigating a target range of between 5-10% affordable housing per development. However, the NSW Government has committed to "ensuring that sales of government surplus land for residential development require 30% of the dwellings across those sites to be a mix of social and affordable housing."¹ Based on this commitment, 600 of the 2,000 approximate dwellings should comprise social or affordable housing. Additionally, the documentation does not appear to identify whether affordable housing will be delivered in perpetuity or subject to time limits. Council's position is for affordable housing to be delivered in perpetuity.

Community Facility (North Parramatta Hub)

The proposed delivery of a North Parramatta Hub incorporating community space (1,000 sqm), including a library link (500 sqm) and subsidised space (500 sqm) is supported. The EIE states that the proposed community facility will be located outside of the rezoning boundary; however, no location for this facility has been identified. The CIS establishes criteria to guide decision-making for new community spaces, including suitable locations, and Council's position is for the community hub to be delivered within the precinct. Additionally, consideration should be given to addressing the need for youth spaces as outlined in the Community Infrastructure Needs Assessment and the Strategic Planning Report.

Open Space and Playgrounds

The Strategic Planning Report states that 10.5ha of public open space zoned RE1 Public Recreation is provided and that in addition, approximately 6ha of publicly accessible / private parks is identified. The latter should not be considered in the calculation of public open space due to private ownership by body corporates, limited usability, lack of public accessibility, and fragmentation. Public open space should be located within 250m to 400m of dwellings where possible and delivered in alignment with CIS criteria (type, usability, accessibility, shape, solar access) to ensure it is fit-for-purpose to service high recreational demand.

¹ NSW Productivity Commission (2024) What we gain by building more homes in the right places, <https://www.productivity.nsw.gov.au/sites/default/files/2024-02/What-we-gain-by-building-more-homes-in-the-right-places.pdf>

The CIS prescribes local playground provision within 250m of high-density dwellings and at a rate of 1 per 2,000 residents. The proposed two new local playgrounds (OS11 and OS14) are supported 'in-principle' and are to be designed for ages 0-12 consistent with CIS criteria to maximise play value.

Open Space Design Guidelines

The public open space, including open space subject to a Vegetated Riparian Zone (VRZ) should be delivered consistently with the CIS criteria with regards to type, usability, accessibility, shape and solar access, to ensure it is fit for purpose. OS1 and OS17 should be zoned consistent with the applicable adjoining zone due to limited recreational capacity and the narrow MU1 zone within OS12 should be rezoned to RE1. There should be a clear delineation between public and private domains through provision of a public edge to RE1 land. Detention basins should offer dual recreational use for enhanced functionality. Solar access controls for open space should be increased to a minimum of 4 hours per day, consistent with the CIS.

Sporting Facilities

'The Green' (OS13) provides an important opportunity to secure an additional sporting field and the field layout should be reconfigured to incorporate a rectangular field within the oval to maximise capacity and flexibility for use, consistent with Council's adopted [Sportsground Strategy](#). The outdoor sporting field should be complemented by indoor or outdoor courts to adequately meet the demands of future residents, workers and students, as per CIS benchmarks. Delivery of indoor sports courts be considered either within OS9 or as part of the university site and in consultation with Council.

Theme 2 Recommendations

1. PDNSW provide details as to the long-term plan for the location of the NSW SES Parramatta Unit, which must be permanently located within the precinct on flood-free land and at no cost to Council.
2. A designated retail precinct be provided that is zoned accordingly.
3. The ownership and management of regional open spaces within OS5 be transferred to Greater Sydney Parklands Trust.
4. All other assets (excluding those in point 3 above) remain in the ownership of the State Government. Public open space must be accessible by the public 24/7 and arrangements made in relation to lease/hire terms. This must be secured by a Deed of Agreement and easements on title.
5. PDNSW agree to the payment of s7.11 contributions as previously agreed by UrbanGrowth NSW. If DPHI decide to exempt or offset contributions, PDNSW must provide details for each infrastructure deliverable including detailed scope of works, quantity surveyors report to support cost of works, rationale for inclusion and proposed use, concept plans and alignment with Council policies, plans and industry best practice.
6. 30% of dwellings be delivered as social or affordable housing in alignment with the State Government's commitment, and that affordable housing within Parramatta North be delivered in perpetuity.
7. The community facility be delivered within the precinct, with consideration for a youth facility component, guided by Council standards as per the CIS, and prioritised for delivery in infrastructure staging.
8. New playgrounds (OS11 and OS14) be designed for ages 0-12 consistent with Council's requirements and be located within 250m of high-density dwellings where possible.

9. The public open space, including open space subject to a vegetated riparian zone (VRZ), be delivered consistently with the CIS criteria with regards to type, usability, accessibility, shape and solar access, to ensure it is fit for purpose.
10. OS1 and OS17 be zoned consistent with the applicable adjoining zone due to limited recreational capacity and the narrow MU1 zone within OS12 be rezoned to RE1.
11. Provide a clear delineation between public and private domains through provision of a public edge to RE1 land.
12. Detention basins to offer dual recreational use for enhanced functionality.
13. Solar access controls for open space be increased to a minimum of 4 hours per day, consistent with the CIS.
14. OS13 be reconfigured to incorporate a rectangular field within the oval to maximise capacity and delivery of indoor sports courts be considered either within OS9 or as part of the university site and in consultation with Council.

Theme 3: Heritage, Design, Accessibility and Environment

Heritage and Design

Council recognises the reduced density in proximity to the Parramatta Female Factory that has occurred in response to a potential World Heritage listing by UNESCO. However, it is considered that further refinement of the structure plan and arrangement of buildings and open space is required commensurate with the heritage significance of the precinct to reinforce the critical relationship between individual heritage items, their curtilage, landscape setting and the visual and physical connections to the Parramatta River.

Figure 1 below illustrates the importance of maintaining the heritage character of the central, connected landscape core, along with the small-scale heritage items within their landscape setting and curtilage. Council does not support the introduction of building envelopes that fill the spaces (curtilage) between these heritage elements. Such intrusions create fragmentation, turning a cohesive group of significant buildings within their landscape setting into a disparate collection. These heritage buildings and their landscapes should be perceived as an integrated group within a unified central heritage parkland zone that provides a continuous physical and visual connection from the Parramatta River, through the core central heritage and landscape zone, to Parramatta Gaol and the Female Factory.



Figure 1 – Recommended protected central heritage setting showing defined building edges

The proposed Buildings F4 and F5 will result in adverse impacts to the Female Factory building in terms of views to the item and its curtilage. The removal of these buildings including buildings F1, F2, F3, H1 and H2 would enforce the existing heritage character of this central area while preserving existing heritage buildings in their landscape setting, allowing Parramatta North to become a 'destination' reflective of the site's unique character and history.

To reinforce the significance of the central green heritage parkland core, the Structure Plan should create a defined, high-density urban edge that separates small-scale heritage buildings. This should be supported by a distinctly different rectilinear and connected urban spatial structure of streets and blocks, that integrate with the existing road pattern beyond the site both physically and visually. This ensures that the new urban development blocks are an extension of the broader urban fabric (Figures 2 & 3).

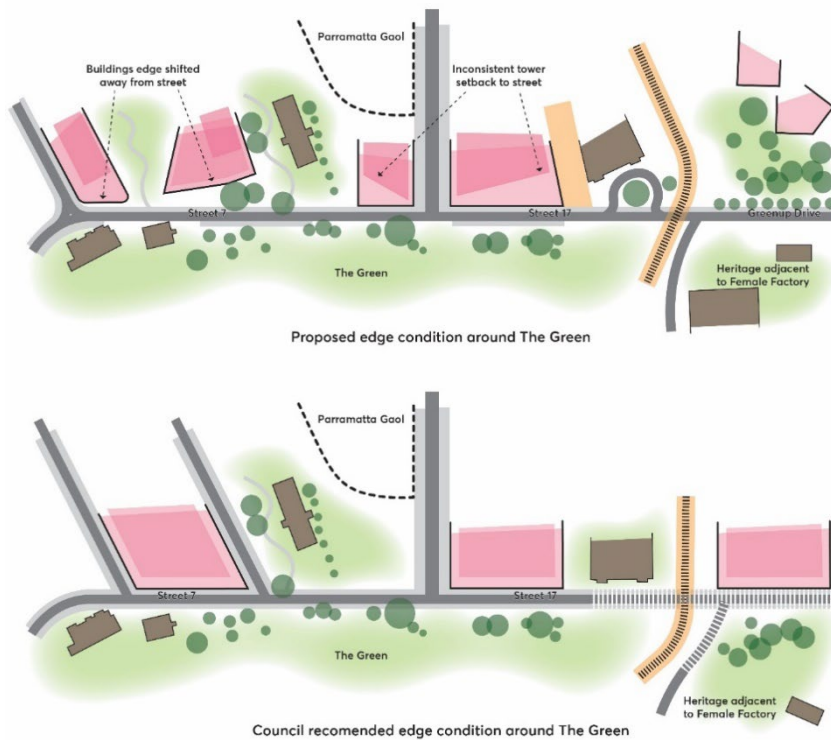


Figure 2 – Recommended indicative high density urban edge (pink blocks) framing the central heritage setting

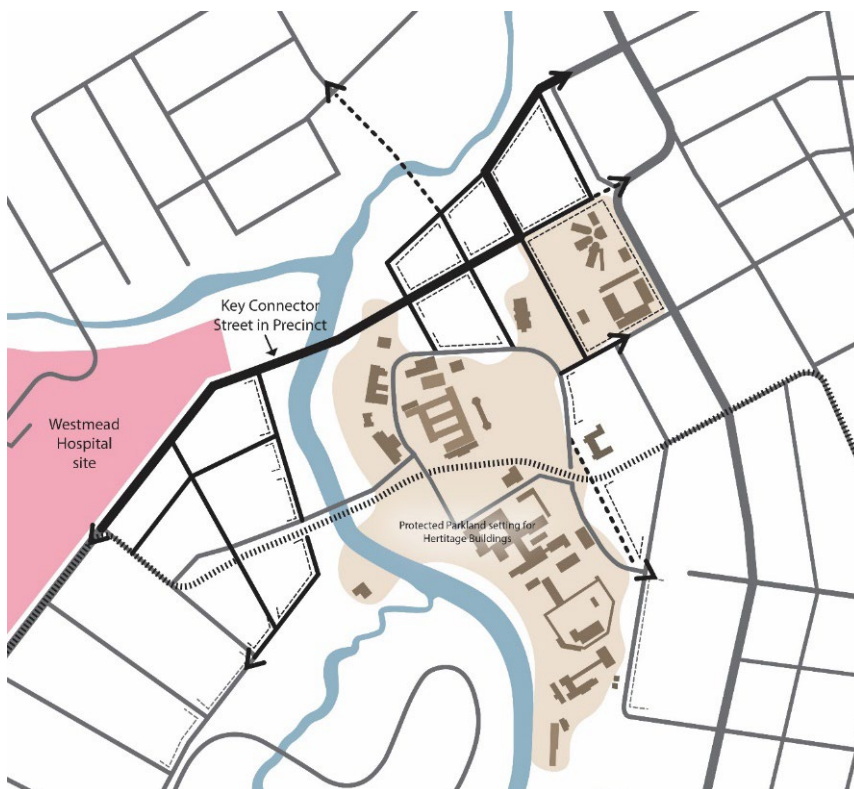


Figure 3 – Recommended indicative modified street and block network that could link into existing urban structure and that is distinct from the existing, curvilinear heritage structure

The proposed layout of the new higher density zones should consist of smaller development blocks, with all buildings having street frontages, backs of buildings facing backs, and fronts facing fronts across a hierarchy of well-proportioned local and main streets. Ambiguous and irregular private open spaces that create awkward built forms should be replaced with formal streets and regular block shapes, establishing a clear hierarchy of public and private spaces and reinforcing the spatial hierarchy of streets (**Figures 2 & 3**).

The vision for the new urban street and block structure should be considered in a long-term context, rather than responding primarily to short-term constraints like existing trees and local traffic conditions.

The Development Framework specifies Floor Space Ratios (FSR) and building heights for designated blocks. Some blocks have an overall FSR and specific zones with defined building heights. Since these heights are set without considering building type, desired design, street interaction, or distance between buildings, they hinder coherent architectural outcomes. This will make future Development Application approvals difficult and time-consuming. The controls should only specify an FSR based on the desired capacity of a lot aligned with the maximum height. This approach allows for architectural solutions that adhere to principles without being restricted by inflexible plans.

Council is concerned for the current variations of street wall and upper-level setbacks proposed that do not reflect spatial structure, building typologies and land use (refer to **Figure 4**). Each street should be designed individually with a consistent built form. Buildings along street edges should be considered as part of a cohesive and well-proportioned composition. Where relevant, street elevations should face each other across the street, ensuring well-proportioned street width and building height. Key streets, including Fleet Street, New Street, O'Connell Street, and Hainsworth Street, should be analysed and designed with consideration for the quality and experience of existing streets affected by the development.

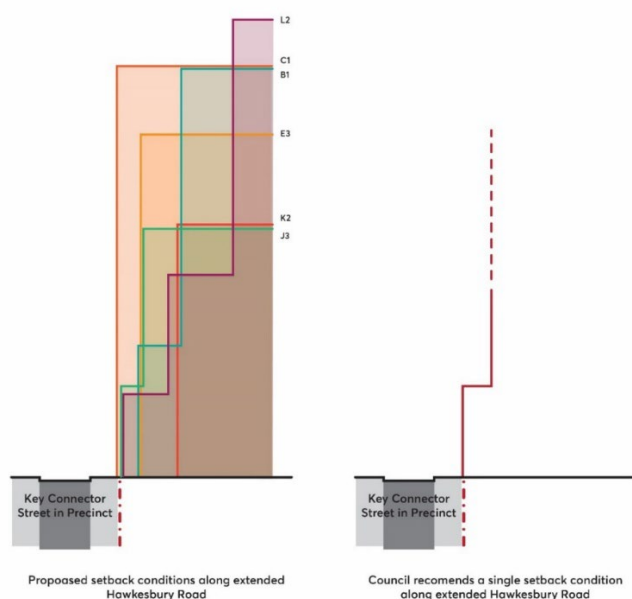


Figure 4 – Diagram (left) showing current variations of proposed street wall and upper-level setbacks along Hawkesbury Rd that do not reflect spatial structure, building typologies and land use. Indicative diagram (right) showing Council-recommended single setback condition.

Council considers that if the heritage and design issues explained above are addressed per the recommendations of this section, the proposal is unlikely to have any impact upon the potential UNESCO World Heritage listing of the Parramatta Female Factory site.

Basement car parking

Basement car parking should be provided for all development subject to appropriate flood mitigation measures being implemented. Where flooding constraints necessitate above ground car parking, it should only be considered in discrete locations where it can be demonstrated that appropriate urban design outcomes can be delivered.

First Nations Heritage

Recognising that Parramatta North is located on the lands of the Buramadagal people of the Dharug Nation, the proposal must sensitively respond to First Nations heritage values and protect the heritage significance of Parramatta North. Council is supportive of the consultation process taken regarding engagement with First Nations people. Given the First Nations cultural and social significance of the precinct and adjacent Parramatta Park, it is recommended that community engagement continue to be undertaken with First Nations stakeholders as the precinct develops.

Accessibility

It is acknowledged that given the evolution of Parramatta North over many years, there are many areas where accessibility is not compliant with the *Disability Discrimination Act 1992* (DDA). It is essential that as Parramatta North develops, measures are taken to ensure DDA compliance wherever possible, both in the interim and once development is complete. This includes access to all thoroughfares, roads, open space and community facilities.

Environment

Biodiversity conservation initiatives are recognised, particularly along the river, including sensitively managing development in proximity to the Grey-Headed Flying Fox colony to minimise disturbance, and enhancement of vegetation along the riparian corridor through weed control, regeneration and replanting. Ensuring that this work is protected as development occurs in stages is important. The confluence of Parramatta River, Toongabbie Creek and Darling Mills Creek is a highly significant and sensitive environmental area, therefore every possible measure must be taken to protect and reinforce its ecological value and to recognise its importance to the region.

Similarly, the response to flooding constraints is recognised. Ongoing consultation with Council officers post exhibition is necessary to ensure that flooding constraints are appropriately addressed in the finalisation of controls.

Archaeological Remains

Any archaeological artefacts uncovered during the development works resulting from the rezoning proposal must be adequately managed and protected. Specifically, appropriate consideration should be given if the remains of Samuel Marsden's Mill are found in the riparian corridor to ensure their ongoing management and protection.

Theme 3 Recommendations

1. **Protect the central heritage setting of the site** – Remove proposed development from Lots F1, F2, F3, F4, F5, H1 and H2 to create a legible central heritage setting that is free from new buildings and that will improve the visual connection between Parramatta Park, Parramatta

River, the Female Factory and Parramatta Gaol. Investigation needs to be undertaken to limit density in these areas while offsetting GFA, if possible, in other areas in consultation with Council officers.

2. **A high-density urban edge framing the central heritage setting** – Configure high-density development around the central heritage setting to provide a distinctive urban edge.
3. **Modified street and block network as an extension to existing network** – Modify the street and block network to be more rectilinear as recommended in Figure 3, that directly connects to the external road pattern. Provide further detailed analysis and design of key streets including a more consistent approach to street walls and setbacks as recommended in Figure 4. Develop a simple hierarchy of local and main streets that can inform legible building typology and ground floor activation.
4. **Heights and FSRs reflective of desired future envelopes** – Relate the proposed heights, FSR and building envelopes on each lot to reflect desired building typologies and land uses.
5. **Amend Design Guidelines** – Amend the Design Guidelines to reflect the above recommendations in consultation with Council officers post-exhibition.
6. **Protecting heritage values** – Planning controls should not compromise the process for consideration of a World Heritage Listing for the Female Factory and Institutions Precinct site and should protect the heritage significance of the Female Factory.
7. **Basement car parking** – Provide basement car parking for all development subject to appropriate flood mitigation measures.
8. **Above ground car parking** – Where flooding constraints necessitate above ground car parking, it should be provided in discrete locations where appropriate urban design outcomes can be delivered.
9. **Continued First Nations engagement** – Engagement must continue to be undertaken with First Nations stakeholders throughout the rezoning process, and in the preparation of planning controls.
10. **Accessibility** – Measures should be undertaken to ensure accessibility compliance in accordance with the *Disability Discrimination Act 1992* requirements both in the interim and once development of the precinct is complete.
11. **Biodiversity and conservation** – Development stages should occur so as not to compromise conservation work that has already been carried out along the foreshore. The confluence of Parramatta River, Toongabbie Creek and Darling Mills Creek be recognised as a highly significant and sensitive environmental area and that any works in the area prioritise its protection.
12. **Flooding considerations** – That PDNSW consult with Council officers post-exhibition to ensure that flooding matters have been appropriately addressed.
13. **Archaeological remains** – Appropriate consideration should be given to ongoing management and protection of any archaeological remains, including those of Samuel Marsden's Mill should they be discovered in the riparian corridor.

Theme 4: Traffic and Transport

Although residents, workers and students within and outside of Parramatta North should be encouraged to utilise multimodal public transport options, this is not always practical, and the incoming population (including the proposed 25,000 students) will result in increased demand for road and pedestrian / shared path infrastructure both within and outside of Parramatta North. To ensure that the precinct is integrated with the broader public transport network and to address the

local traffic impacts resulting from the proposal, buildings should not be occupied until these upgrades are completed and Parramatta Light Rail Stage 2 (PLR2) is operational.

Traffic congestion both in and around this area is already severe, particularly at peak hour periods, and the incoming population will increase congestion significantly. Subsequently, Council considers that the proposal will impact existing road infrastructure. Road and intersection upgrades will be critical to accommodate the additional demand placed on this infrastructure as a result of the proposal. For example, the James Ruse Drive and Windsor Road, and North Rocks Road and Church Street intersections are already highly congested and will be utilised by future residents noting that public transport options do not always provide the most direct and efficient mode of transport. These two intersections, as well as a right turn bay from Church Street southbound into Dunlop Street westbound must be upgraded as a condition of the proposal. Further work must be undertaken to identify the staging of key road and intersection upgrades, and a commitment must be given by the State Government to addressing this critical issue in a timely manner.

Further to this, pedestrian and bicycle connectivity is important throughout Parramatta North and beyond, particularly noting the incoming student population (25,000 students). Pedestrian and bicycle pathways must be appropriately designed and located in this regard.

Theme 4 Recommendations

1. Buildings should not be occupied until Parramatta Light Rail Stage 2 is operational.
2. Traffic and transport upgrades be identified to support the proposal, including (but not limited to) upgrades to the James Ruse Drive and Windsor Road, and North Rocks Road and Church Street intersections, and a right turn bay from Church Street southbound into Dunlop Street westbound, and a commitment to their delivery is made as a condition of the proposal by the State Government.
3. That PDNSW consult with Council officers post-exhibition to ensure pedestrian and cyclist paths are appropriately designed, and that transport management impacts have been addressed.