

Submission Parramatta North Urban Renewal

Barry & June Bullivant OAM

2014



This is a submission from private citizens who are protectors of and are passionate about the History and Heritage of Parramatta.

Barry G Bullivant OAM June M Bullivant OAM
50 Dawn Street, Greystanes 2145
0438 31 0216

Submission Parramatta North Urban Renewal

5TH December 2014

The Hon. P.J. Goward M.P.
NSW Minister for Planning
GPO Box 5341
SYDNEY NSW 2001

Dear Minister,

We are against the development of the Parramatta North Urban Renewal in its current form.

Both Barry and I have been long term protectors of the History and Heritage in the Parramatta area. We have worked on projects like the University of Western Sydney Campus as early as the 1990's. We know that there are many people in the area that are passionate about the Female Factory Precinct but may not come forward due to the many varying factors like never complaining, being very shy and other things come into play like they do not know how to write a submission.

We have been involved in groups who have actively worked to preserve this area over many years, they have numerous signatures on a petition of people who found that an easier way to go. Minister we feel that it is extremely important that a Conservation Management Plan for the convict buildings on this site be put in place before it is turned in a building site.

We feel that the current procedure being followed is seen to be lacking due to the commercialisation of this Precinct and that a thorough, independent and transparent study be undertaken before any move to sell any part of the area for high rise development. Minister the Precinct should also be World Heritage Listed prior to any development. We would have thought that the New South Wales Government would have had the fore thought to put this into place before it raced to put an important Tourist Destination at risk by this development.

Whilst we realise it is important for the growth of Parramatta that we plan for the future residents, it is also important to know that the land which has been managed by the State Government on behalf of our community be protected for the future generations of our great City and for the people of Australia.

In the meetings that have been held in Parramatta, not once has it been mentioned where the money from the sale of the land will be used. There was no mention of conservation management; the whole procedure was focused on the building and sale of land. This is extremely worrying given the fact that overseas investment is rife in New South Wales and that most of Parramatta will be owned by people who are not residents of Australia.

The networks that we are involved in have already put the other issues and the historical case forward. Minister we ask that a Plan of Management to protect the area be put in place before the Urban Growth plan is actioned.

There are many people who are passionate about Parramatta History and for the ones who cannot or will not speak out; we speak for the average citizen who speaks to us when we are out in the community.

Yours sincerely

Barry G Bullivant OAM

June M Bullivant OAM.

Mr Barry G Bullivant OAM
Mrs June M Bullivant OAM
50 Dawn Street
Greystanes NSW 2145
Phone 0438 31 0216

Urban Renewal,
Planning and Environment
GPO Box 39
SYDNEY NSW 2001



RE: NORTH PARRAMATTA URBAN RENEWAL

Dear Sir/Madam,

The Australian Garden History Society is the leader in concern for, and conservation of, significant cultural landscapes and historic gardens through committed, relevant and sustainable action. It has three branches in NSW and this submission is made on behalf of the Sydney and Northern NSW (i.e., the local) branch (the Branch).

We are pleased to provide this letter of objection to the proposed Parramatta North Urban Renewal.

The reasons for our objection is as follows,

1. Inadequate consideration of impacts of high density development in the vicinity of a World Heritage listed cultural landscape of Old Government House and the former Government Domain

We strongly object to the proposed location of 7 storey buildings within the sports precinct. The sweeping views across the Parramatta River from Old Government House and the Domain are identified in the Management Plan prepared as part of the World Heritage Area listing (National Trust of Australia (NSW) & Parramatta Park Trust 2009, *Old Government House and Domain, Parramatta Park Management Plan*). The analysis of views from the World Heritage Area in the Landscape Heritage Report reveals several locations where the proposed building heights will exceed the tree line (*Parramatta North Urban Renewal Cultural Landscape Heritage Assessment*, Musecape 2014). The assessment concludes that the, '*visual impact of the actual buildings will be attenuated by implementation of DCP controls on design, materials and exterior finishes*'. We consider that the view assessment fails to consider the dominance of the built form on existing 'park-like' world heritage vistas and relies too heavily on external building finishes. To maintain the treed outlook to the north from the World Heritage Area, proposed buildings within the sports precinct should be reduced to maximum of 4 storeys to ensure that they can be screened by canopies of existing and new mature trees.

2. **Inadequate assessment of impact of high rise developments on cultural significance of the Cumberland Hospital Precinct**

The reports on the heritage buildings (*Parramatta North Urban Renewal (Cumberland/Sports and Leisure Precincts) Built Heritage Assessment*, TDK 2014) and report on the heritage landscapes (Musecape 2014) within the Cumberland Hospital Precinct, describe individual buildings and open spaces that make up the precinct. The reports fail to assess the impact of the imposition of the proposed high rise buildings, of up to 65 metres in height and the ancillary requirements of these buildings, on the cultural significance of the place. Views have been considered in the Musecape (2014) report from outside of the precinct however and more importantly, the impact on views to and from heritage buildings located within the precinct, have not been considered. This level of detail, including perspective views and sections through the site, must be undertaken as an integral part of a heritage impact assessment to give the public confidence in this assessment's rigour. We consider that the buildings in close proximity to heritage buildings are an inappropriate scale and must be reduced in height and bulk. We strongly recommend that to preserve the heritage character of the precinct, the proposed areas labelled on the Development Lot Map in the Draft DCP as F1, F3, F4, F5, F7 and F8 should be reduced to maximum of 3 storey high townhouses with greater consideration of views and view corridors. Development in E3 should be deleted and in G1 and G2, development should be reduced to 5 storeys maximum height.

3. **Inadequate assessment of impact of high rise developments on the Cumberland Hospital Precinct**

The proposed siting of residential towers throughout the Cumberland Hospital Precinct conflicts with the recommendation to '*establish appropriate curtilages and settings for retained significant buildings*' (Musecape 2014). This precinct is not just buildings, but a designed cultural landscape with open spaces, roads and plantings that all have heritage significance. The proposed scale and density of development is inconsistent with the recommendations of the previous Conservation Management Plan by Perumal Alessi, Edward Higginbotham and Associates, Geoffrey Britton and Terry Kass 2010 and the Landscape Conservation Plan *North Parramatta Government Sites Landscape Conservation Plan* (Geoffrey Britton and Colleen Morris, February 1999). It will be highly intrusive to the visual setting and curtilage of key heritage buildings such as the Nurses Home and Recreation Hall and significant landscape features such as the Cricket Oval. The proposed building layout fails to consider the identified historical connections across the site. A 7 storey building is proposed at the end of the axial view from Dunlop Street across the Cricket Oval. Pine Cottage is described as on an axis between two significant Bunya pines, both trees are likely to be removed with development in G1 and F6. Many important plantings related to buildings are removed by the poor siting of new buildings. The lack of a rigorous assessment of the existing heritage buildings and plantings and their historical connections fails to preserve the cultural significance of this complex heritage place. We strongly recommend a review to propose a lower density development which would be less intrusive and enable a more sensitive response to the heritage values, associations and visual setting of the heritage buildings and significant historic landscape elements of this precinct.

4. Inadequate assessment of impact of extent of excavation on tree loss

We strongly object to the high density development within the Cumberland Hospital Precinct and associated basement parking required for the proposed approximately 9000 cars. The proposed plans showing relatively small building footprints fail to inform the public of the extent of basement excavation implied and required and thereby, the inevitable significant tree loss. The permitted setbacks proposed in the Draft DCP provide, in most cases, 2 metre setbacks to development lot boundaries. The building setbacks dimensioned on the detail lot diagrams do not restrict the extension of below-ground structures and with minimum 20% requirement of site area as deep soil, basements can take up the remaining 80%. We consider that to retain the landscape-dominance of the precinct and its heritage values as an historic landscape, building setbacks should include below-ground structures and the deep soil provision requirement should be increased to enable preservation of existing significant trees or the planting of new trees such that they will be able to mature to their normal size. To reduce the impact of basement excavation and ensure the retention of the culturally significant landscape character and convince the public this plan is serious about heritage landscape conservation, we recommend a minimum 50% deep soil area requirement should be provided in the planning controls.

5. Loss of public open space

The increasing population density in Parramatta demands greater provision of public open space. The benefits of green space within our cities has been recognised by state and local governments in NSW who have committed to create 20% more green space in urban areas by 2020 under the 2020 vision <http://2020vision.com.au/the-vision/>. We strongly object to the loss of available public open space within the Parramatta North Urban Renewal site that clearly conflicts with this Government commitment. The overall loss of green space under this proposal has not been calculated but the increased infill proposed across the site will significantly reduce the green space available for tall tree planting and open space amenity that provides economic as well as environmental value, within the centre of Parramatta. This is unacceptable.

6. Proposed avenue planting is considered inappropriate

The proposed avenue planting through the Cumberland Hospital Precinct has little heritage relevance in terms of both species and location. In addition, their suitability as street trees is considered inappropriate. The proposed planting of *Eucalyptus saligna* (Sydney Blue Gum) as an avenue tree is considered inappropriate due to their large mature size and the likely hazards to the target area of roads, parking, pedestrian paths and heritage buildings. Similarly the choice of *Jacaranda mimosifolia* (Jacaranda), as well as being historically incorrect, as a street tree (for a pre-20th century precinct) does not address the pedestrian slip hazard caused by this species' abundant blossoms. Other species, where avenues are considered appropriate, should replace these two based on historic species used on this site. The landscape heritage assessment should consider the impact of the proposed avenue planting on the precinct

landscape spaces including on existing trees such as the existing plantings enclosing the Cricket Oval.

7. The draft DCP is considered an inadequate form of planning control for heritage conservation

The draft DCP is inadequate to ensure protection and conservation of the cultural significance of this site. The failings of the heritage assessment discussed in items 1,2 and 3 above result in a document with little clarity or direction for management or future development approvals. The proposed controls and diagrams give insufficient detail for a site of this complexity to ensure conservation of the built and landscape environment and protection of the remaining adjacent natural environment. As a planning document the Draft DCP controls are insufficient and poorly articulated. The draft document enables developers to optimise the amount of built form at the expense of more sensitive elements such as heritage buildings, landscape elements, views and vistas and most importantly significant tree plantings. The clause 'if possible' should be deleted where a desired outcome is required. This is not optional. The proposed minimum setbacks to lot boundaries (2m) is manifestly insufficient for any viable tree planting to mature sufficiently to be able to screen or soften buildings and will rely on landscapes outside the proposed development lots to provide any amenity to or screening for the remaining heritage buildings and areas.

DCP controls are at best 'guidelines' that can be dispensed with where disputes arise. To give the public confidence in the planning controls for this sensitive heritage landscape, we strongly recommend that LEP planning controls inform and control the landscape design including,

- Increased building setbacks to development lot boundaries to provide sufficient area for required amenity or replacement planting such that large enough tree form will result to achieve this objective;
- Identify all existing significant tree plantings, landscape structures and garden elements required to be retained on lot diagrams;
- Detail the ground floor interface within development lots to optimise common area and limit private courtyard encroachment into building setbacks.

8. Lack of independent panel of heritage experts in planning process

Urban Growth NSW seeks to remove the statutory approval role of the Heritage Council by way of a 'draft tripartite Conservation Agreement among the Commonwealth, NSW Government and Parramatta City Council for the protection and conservation of World Heritage Values and National Heritage Values of the Australian Convict Sites, Old Government House and Domain, Parramatta Park' (Musecape 2014). We object strongly to this proposed agreement as lacking both transparency and independence. The Heritage Act 1977 was enacted to govern all works affecting heritage properties including government owned properties of state heritage significance. This Act arose in

direct public outrage and opposition to cavalier Government demolition and disregard of heritage sites in a previous 'development boom' in the 1970s.

We object to the lack of oversight of this key precinct by an independent heritage expert panel. Without this the public can have no confidence in a planning process which directly and adversely impacts both state- and commonwealth-listed heritage properties.

In conclusion, we strongly recommend that a single independent management body with appropriate expertise is established as a priority with an identified key purpose for conserving the heritage values of this site, that forms the basis of all development controls and future outcomes.

We would be happy to discuss points made in this letter if that is of assistance. Please contact me at the address below.

Yours sincerely

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

James Quoyale

Secretary, Sydney & Northern NSW Branch
Australian Garden History Society
PO Box M177, Missenden Road PO
CAMPERDOWN NSW 2050
By email: james@qanda.com.au

15 December 2014



Re: Parramatta North Potential State Significant Site

Thank you for the opportunity to respond to the Parramatta North Potential State Significant Site. This is a site of national heritage significance for both its Aboriginal and Colonial past.

Concerns have been raised with my office about the fact that announcements made by Premier Baird to date have indicated the Government is committed to proceeding with these plans, potentially regardless of the outcome of the consultation.

We have had a number of substantial concerns raised with the office about the proposal, most of which point to perceptions that the project will lead to an out of scale overdevelopment of the area with high rise of up to 52 storeys dominating the skyline and disturbing the visual amenity of the important heritage precinct.

There are also real concerns that the focus on increased density and commercial opportunity in the plan will have the unintended consequence of increased social dislocation and the creation of substantial traffic problems.

While the respectful adaptive reuse of heritage buildings is considered desirable this has not been the focus of this proposal. The fact that the plan does not propose to invest in the site to produce a public World Heritage listed precinct like the small Hobart Female Factory and Port Arthur is an oversight that should urgently be rectified.

The following additional issues should also be considered further if the proposal is to proceed:

1. The NSW and Commonwealth Governments must guarantee support for the Parramatta Female Factory's National and World Heritage Listing and properly funding a public trust to safeguard the site's heritage significance. No development can be allowed to compromise the ability of the Parramatta Female Factory Precinct (including the Parramatta Female Factory, Roman Catholic Orphan School, Gaol and Kambala) to gain National and World Heritage listing status.
3. The adaptive re-use of heritage site buildings be in full consultation with the community and relevant interest groups including Historic Houses and the National Trust as well as those involved in the project's preliminary consultative "charrettes".
4. Changes should be made to ensure that the zonings do not permit any buildings in excess of 10 storeys high. This would ensure that the redevelopment does not overwhelm the surrounding heritage buildings and precinct.



David Shoebridge MLC
Member of the NSW Legislative Council

**The Greens NSW
Submission
19 December 2014**

5. The proposed 'sensitive infill' 6 storey building between the Female Factory and the Orphanage currently blocks the sight line between the two, this must not be allowed. A commemorative community garden is considered an acceptable alternative by many in the local community.
6. Aboriginal heritage values must be fully protected under the plan in accordance with the recommendations of the Aboriginal Heritage report. This must be resolved before the proposal is progressed further.
7. The proposal to relocate the swimming centre complex should be rejected in favour of an on-site upgrade with surrounding building heights significantly reduced, especially on the northern side of the pool.
8. Currently public land should remain in public hands and the government should invest in this project as a great heritage/history tourism and residential project with good provision for affordable public housing.
9. Provision must be made for significantly improved public transport for the area including a light rail network and dedicated cycle ways, and heritage building restoration and enhancement must be early priorities of the project.
10. Provision needs to be made for a larger public school and other community services nearby.

Thank you for the opportunity to comment on the proposed State Significant Site, if you have any questions or require further information please don't hesitate to contact our office on 9230 3030 or at david.shoebidge@parliament.nsw.gov.au.

Regards,

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

David Shoebridge
Greens NSW MP
Spokesperson for Planning

Louise Mansfield

From: Kate Belfield <kateb0402@hotmail.com>
Sent: Tuesday, 14 April 2015 11:04 PM
To: information-Planning
Cc: Kate Belfield
Subject: Submission - North Parramatta Urban Renewal Plan

Attention: Anna Johnston, Senior Planner
Dept of Planning & Environment

I submit my concerns regarding the impact of the North Parramatta Urban Renewal Plan on this heritage precinct of Parramatta. This unique site must not be lost to the people of Australia, or swamped by insensitive development. The whole heritage precinct could be the drawcard for large numbers of visitors to the rest of Parramatta, were it be given the resources equivalent to what other sites of this nature receive.

I entirely endorse the submission from Dorothy Warwick of Guildford, copied here below. She has said everything I would want to say so thoughtfully. Please think again about ways that this wonderful site could be presented to the people to maximize its historical potential - and I do not mean commercial development potential!

Thank you for this opportunity to make a submission.

Regards,

Kate Belfield
25 Research Road
Narara. NSW 2250

Ms Carolyn McNally
Secretary
Department of Planning & Environment
GPO Box 39
SYDNEY NSW 2001

18th December 2014

Dear Ms McNally

Re: North Parramatta Urban Renewal Plan.

Thank you for the opportunity to make the following submission regarding UrbanGrowth NSW's North Parramatta Urban Renewal Plan.

I have grave fears that the Plan as presented will have a devastating impact on what has to be the most significant heritage precinct in Australia. The reasons for my concerns are outlined below and endorse those put forward by the National Trust.

- The proposal places undue development pressures on the landscape and heritage of an area that will be much needed for open space for the increasing Parramatta population in coming decades.
- The area outlined in the Plan has been predominantly public land since early European settlement and its continued management and control should remain as an integrated precinct that is managed by a single government agency to ensure the

long term survival, co-ordinated maintenance, conservation and presentation of this state and nationally significant cultural landscape.

- That the declaration of the project as one of State Significance removes the Heritage Council from the decision making process. If there was ever a situation where the Heritage Act and its operational authority were necessary to protect and preserve our national heritage, surely this is it. Only the proper involvement of the NSW Heritage Council in the decision-making process will produce a worthwhile development for the people of Parramatta, the State of New South Wales and the Australian Nation.
- The scale and quantity of development proposed is contrary to the principles and guidelines provided in the Conservation Management Plans prepared for the NSW Heritage Council in conjunction with the State Heritage Register Listings.

- That the excessive development indicated in the concept drawings will become even more intensive given the past history of the Parramatta City Council for increasing building heights following subsequent applications after the initial approvals.

- Given the location, heights and density of buildings outlined in the proposal I vigorously oppose:
 - o the construction of new multi-storey buildings in the Female Factory precinct
 - o the construction of 16 storey buildings directly adjoining the Recreation Hall, Chapel and Parramatta Gaol
 - o the construction of 4, 6 and 8 storey mixed use developments in Parramatta Park along O'Connell Street
 - o the demolition of the highly significant residence of the Chief Attendant, 9 Fleet Street.

- That in addition to the points above it is essential that the Central Male Block which has a heritage value of "high significance" be retained.

- That parking provisions are inadequately addressed in the proposal and before any rezoning is contemplated a detailed analysis undertaken so that the full implications this issue are placed into the public domain.

- That the photomontages presented in the proposal appear to be very misleading and understate the impact on viewlines and values of the World Heritage Listed Old Government House and Domain

- That the proposal does not adequately address Aboriginal heritage, cultural and landscape perspectives and therefore further involvement of the Aboriginal community in decision making regarding this project be undertaken.

In conclusion, whilst I support the principle of sensitive adaptive re-use of heritage buildings, so as to provide for their ongoing heritage conservation and presentation, the lack of the necessary controls and management of such measures is not adequately assured in this proposal and until such is provided I cannot support its endorsement.

Yours sincerely

Dorothy Warwick
29 Cardigan Street
Guildford NSW 2161

19/12/2014
50 Sorrell St,
Nth Parramatta, NSW 2152

To: Director Strategic Assessments
Dept. of Planning and Infrastructure
Dear Sir/Madam

RE: The Parramatta North Urban Renewal [PNUR]

Thank you for the opportunity to comment on the above Draft Policy Statement. Please note that, given the short time provided and timing for the public response to the very large and complex proposal this reply is limited and does not have all items of significance itemised and elaborated upon.

I believe upon examining this proposed rezoning and development of the area of North Parramatta outlined in the above documents is something that No Politician over the last two hundred years would have been so limited in vision or uncaring about maintaining the National assets involved in this proposal. I also feel that the bureaucracy supporting this proposal has much to be held accountable for in supporting and prospering the arguments for this land grab and denigration of the locations involved.

The land involved can be considered the equal to the Domain, Centennial Park and the Botanical Garden of the Sydney City Area necessary for the future expansion of the Parramatta City [the proposed second centre for the Sydney region]. All the land involved is owned or controlled by the community and must be held intact for the community use over time as our predecessors had planned.

The overturning of this status will be an act of desperation and lack of vision, with questionable motives and objectives.

I have lived and resided in the area for over 65 years and have taken an active community role including being an Elected Member of Parramatta City Council. Up until recently the PCC Council members and officers have regarded that this historical and open area is critical in the development of and maintaining the stature of the city as The Cradle City whilst proving a corridor for the city to expand around and embrace into the future.

The listing of the 6 broad objectives of this proposal can be considered to be either badly missing the target or designed to obscure the true objectives of the various reports.

A limited review (given the difficulty to obtain detailed examination of the whole of the documentation) of the various documents provided restricted time from the public

presentation to response time allowed to the public. However many of the subjects are insufficiently detailed, misleading, failed to consider the impact of a proposal of this size and its complexity upon the whole community. The report does not outline in detail the benefits to the local community or what is to compensate for the impact that a rezoning of this magnitude with up to 12,000 new residents plus other commercial and retail enterprises would bring.

It appears little consideration has been given in the planning of this proposal to the changes in the demography of the area as indicated by the latest census information as available on the PCC web site. This is shown by rezoning and disposing of a large area that has been kept for the public use, which was the former North Parramatta Infants school. The census information shows that there has been a significant increase in the area of school age children without even considering what will happen with the children resulting from the proposed increased population density of the proposed rezoning. To my understanding the local schools are at a high level of occupancy with very limited capacity for expansion.

Other impact changes not considered are the many buildings up to 30 storeys high is that the nearest Fire Station (Northmead) has been closed, site sold and relocated. I believe there is a fundamental duty of every Government and its officials is to ensure the communities safety. This area has minimal public facilities to accommodate the new proposed demands, may be some re-adaptive use could be accommodated in the heritage facilities? These reuses have not been explained so that it can be considered.

In reading the proposals documentation I was unable to locate who actually has proposed and championed the change in rezoning the Nth Parramatta area. In the future we may want to attribute the same honors as those given to other visionary public officials such as Mr. Bradfield etc.

The parking within the proposed rezoned area will be a problem given PCC parking policy in the surrounding area and also the loss of parking in Parramatta park, extra residents and commercial usage and doubling the population of the area based upon latest Census Info. This will be a problem that will not be resolved into the future as the general expansion of the Parramatta City area continues.

At a meeting with the Premier and the former Minister for Western Sydney, the vision given to the community at that time is very different to that documented in this proposal. According to my recorded notes from that meeting this proposed rezoning is incorrect in its direction / scope or we have been deliberately misled. This has to be clarified?

The proposed rezoning of the area may be illegal and does not conform to the requirements of other relevant legislation regarding the areas concerned

The rezoning proposals impacting the area involving the Parramatta Park would appear not to comply with the current NSW legislation. The Park authority /

management nor the state government appear to have complied with the existing provisions regulating the usage and size of the Park. The proposal to allow alternative uses for those sites to the east of the river and bounded by O'Connell St in particular fail to comply with a requirement that it be use for the "promoting the health and recreation of the inhabitants of the Town of Parramatta" . Also the proposed changes to the use of the land covered by the lease of parts of the Park that include the League's Club, the RSL Club and the Council do not comply with the original intent at the creation of the Domain Act and use of the Park Land.

The case has not been made in the documentation provided to the public to substantiate that the Park will comply with those legislated requirements relevant to its size, amenity and usage. No certified documentation has been supplied.

Parramatta Park is among the most significant public land in NSW and Australia. Parramatta (park) is not called the Cradle City for no reason and the Old Government House has played a key role in the development of NSW since colonial times and therefore Australia. The impact upon the Park and its buildings should be protected from developments such as those proposed, they should be stopped and consigned to the rubbish bin. No Government, politicians or community has disrespected the area of such historical and cultural (Aboriginal or European) significance.

The proposed planning approval process of all the buildings appears faulty in that no consideration has been listed that requires All developments (irrespective of Height or size) must be approved by the appropriate heritage authority that must consider any and all impact upon the significant heritage building, aspects and open spaces within the area, the applicant must fund the full cost of any investigation prior to approval. The PCC DEAP group should be reconsidered as the determining authority for heritage consideration as it may be limited in experience or not correctly focused on the issues under consideration. It would appear that over a considerable time various Government Departments have taken a policy of degrading the area and isolating it from the wider community.

The stated objective of improving access to the river frontage is just a sop to the community with a total lack of vision, an limited understanding of the local area (other than a Google map examination of the area) or any commitment of resources and timeframes to the limited enhancements. It would appear to only be a opportunity to provide an excuse to facilitate expansion of commercial usage.

Another problem with this planning process has been considering this area in isolation as a subject of what is the maximum amount of commercial / residential resale value that can be achieved by the State Government. The problems commence with failing to consider the significance of the adjoining land use zones such as the

- Parramatta Central Business area and its growing demands over time.
- The Westmead Health Precinct its (International, National, State and Local) significance as a major faculty for health care and research. It is without doubt a monolith in size, capacity and complementary adjoining supporting services.

The area has needs for improved public access, transport and vehicular flow-through and around the area to be expanded into.

The plan has failed to consider the impact of the numerous buildings high-rise in the Nth Parramatta Rezoning impacting critical emergency air services to the Westmead Hospitals. This would make landing and takeoffs more hazardous and take additional time to undertake urgent medical tasks. No consideration has been indicated regarding this issue.

The plan has not fully considered the very limited access of the number of proposed residents and commercial businesses(over 10,000 24/7 occupiers). The perimeter access points has limited capacity on an already saturated road network (competent transport review would have highlighted this bottleneck).There is no guaranteed indication that any of the internal roads or bridges over the river will be enhanced or additional structures added. The rezoning has not considered how this area would connect and function with adjoining suburbs such as Westmead and Northmead with virtually non-existent road and interface points.

No feasible additional public transport has been included such as the inclusion of a stop nearby on a heavy rail underground loop of the Parramatta Business area. the track could joining the Rydalmere (University area), the Sport and Park areas, Westmead children's hospital facility, Westmead and then Parramatta commercial areas. You need to remember that this proposal plans to double the residents of the area without adequate connecting transport. The planning here is to a much lesser standard than what has been provided to the new suburbs in the Eastern Suburbs (with heavy rail, bus and tram connections) what is the reason for the difference?

The planning ignores the fact that a part of the area has been used for over flow parking for the expanding Law facilities in the Parramatta City as well as for sporting events. With the absorption of these areas no consideration of the impacts has been included in the plan or mitigated. The growth of the Parramatta Business Area, the Westmead Health facilities and the extensive Law facilities, the growing public services and commercial operations of the area requires significant public transport of All kinds and vehicular parking.

The whole of this area and heritage buildings included with the proposed rezoning plans should be incorporated into the Parramatta Park Domain for the ongoing benefit to the people of Parramatta.

This review and legislating process whereby the most significant beneficiaries (the NSW Government and the relevant Department) of the forced re-zoning of this land, from long standing community use (mental health facility, welfare and care facilities, maximum security goal and sporting and recreation facilities and environmental buffer areas), to high density residential units and commercial premises is wholly proposed, structured, managed and approved by itself or functionaries. If the circumstances do not suit they will change the law to meet the required circumstance. However, the community over time will fully understand what has occurred and hold those responsible accountable.

The consultation process regarding this redevelopment proposal is consultation by name only in that it primarily has involved discussions with various government departments, the Parramatta City Council (both of which are at the control of the State Gov't) and a few land holders who would have very significant capital gain if this proposal is proceeded with. Little input has been undertaken with the long standing local residents, community groups and those interested in the heritage of the area. At no stage has the option of doing very little with the area been considered or put as an option. None of the downside consequences has been detailed nor the opportunity costs of proceeding with the proposal have been documented. These issues should have been elaborated upon and included with the documentation.

The deliberate closure of the Parramatta Gaol has little merit given the critical shortage of appropriate cells in the State. It also should have been used going forward as a remand facility to service the large legal precinct within Parramatta and also for the accommodation of prisoners doing weekend detention sentences. It does not require adaptive usage proposals. It's main function has not significantly changed over a long time.

A few vague offers have been made to add additional land into Parramatta Park to include the wisteria gardens and associated surrounding land along the river, up to the Hospital precinct, should be mandated and permanently legislated as a condition of any approval process. Along with changing the status of the Park the law needs to protect it from any other Government in the future from a greedy attempt at a land grab.

The State Government has not highlighted or allocated any area it will conserve in this plan for key Community space/facilities that could be relocated from Sydney City area such as the Art Gallery, State museum or the State Library. This would have many benefits by freeing up space and resources in the Sydney City Proper, allowing

redevelopment of that space, reduce traffic congestion in the city and also move employment opportunities to the western suburbs.

An examination of the available information does not detail the full extent of the various environmental hazards and pollution such as asbestos, fuel, pesticides and other chemicals (such as lead and arsenic) that have been extensively been used over the whole of the proposed redevelopment site. No detailed examination has been provided and the review should not be considered until the extent and remediation costs have been provided. Any development must carry the cost of all required work.


The documentation that has been provided for public consideration (on any of the available web sites) does not show what ministerial activity initiated this proposal to rezoning of the North Parramatta area and what were the aims and extent of the review. This should be clarified before any further consideration is proceeded with.

Even the various report writers state clearly that the information contained within their reports has significant limitations and interpretation for the documents (Section 7- page 46). This is another factor that has diminished their value to the community to review and comment upon these proposals in addition to the short time to respond limits our ability to obtain professional advice. Is this another tactic to restrict the public's capacity to comment on this proposal?

The visual impact of the proposed developments has not been fully shown given the many historical buildings and visual landscapes. Also many residential properties nearby have not been considered. A number of images from different aspects have not been taken to show the impact of the many high and bulky buildings will have from different perspectives. The minister and the local council have responsibilities in this matter.

Thank you for taking the time to read, examine and consider my comments, thoughts and suggestions for improving the proposed rezoning/development of the North Parramatta area and the surrounding community.

Regards,



Mr. Laurie Bennett

If you wish to discuss any of these matters further, feel free to contact Mr. Laurie Bennett on 0407 241 456 or at: bennettlogistics@bigpond.com.



**BICYCLE
NETWORK®**

18 December 2014

Parramatta North Urban Renewal

Bicycle Network submission

Bicycle Network welcomes the opportunity to provide comments on the Parramatta North Urban Renewal project. The proposed changes to the planning controls for urban renewal in Parramatta North is a great opportunity to plan for cycling infrastructure to further increase active travel in this 'fringe CBD' location.

Bicycle Network recommends the following changes to further support active travel in the precinct:

Foreshore pedestrian and cycle link

The Framework Masterplan (Summary Document, Pg. 15) shows a 'north-south link along the Parramatta', however the proposed pedestrian and cycle network (Pg. 31) shows a missing pedestrian and cycle link (See figure 1). There needs to be a connected north-south link all the way along the river front to encourage active transport. The shared path should be a minimum 3m wide.



Figure 1. Missing pedestrian and cycle connection

New pedestrian/cycle shareway and through site links

There is confusion regarding the naming of some of the pedestrian and cycle network paths in the precinct. Differences between the 'shareway', the 'pedestrian and cycle link' and the 'through site links' need to be identified. All paths or 'links' need to accommodate pedestrians and cyclists and need to be a minimum of 3m wide.

End of trip facilities

It is encouraging that resident and visitor bicycle parking is to be provided in accordance with Council's DCP requirements. As the planning framework is encouraging active transport and that walking and cycling will be given priority, Bicycle Network recommends that residential flat buildings have a bicycle parking rate of 1 bicycle space per dwelling (currently 1 bicycle space per 2 dwellings).

For business premises, stronger provisions around end of trip facilities also need to be included instead of 'adequately service the number of bicycle parking spaces required'. Bicycle Network recommends one locker to each bicycle parking space and one shower for the first 5 employee bicycle spaces, plus one to each 10 employee spaces thereafter.

Bicycle Network trusts these comments will be carefully considered when finalising the planning controls for urban renewal in Parramatta North.

Sincerely,



Grace Macpherson
Government & External Relations Coordinator
Bicycle Network



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Melbourne VIC 3000

234 Crown Street
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210 Collins Street
Hobart TAS 7000

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74 Honiton Avenue,
Carlingford, N.S.W. 2118

December 17, 2118

e-mail: information@planning.new.gov.au

Department of Planning,
G.P.O. Box 39,
SYDNEY. N.S.W. 2001

**Submission: Parramatta North Urban Renewal - all precincts
The Tasmanian Female Factory, not as old as ours, has World Heritage listing!**

It is apparent the process is flawed; obviously the public should be able to make submissions about the 'brief' to be given to consultants first, as well as being able to comment on the draft proposal. It would certainly save government/instrumentalities and us, both time and money.

As was the case for the 'exhibition' that was held at the Parramatta Swimming Pool, that at the Parramatta Town Hall last week was no better. If what I saw was a rezoning plan it was unacceptable. More substantial documentation should have been on display and have shown to be at least equal to a draft Local Environment Plan that a council must prepare.

This proposal decimates the public good and threatens heritage listings, current and proposed, so it should be completely discarded. Take, take, take, take - is there no end? No other ideas have been put forward to make the whole heritage precinct strip in North Parramatta one of the major drawcards in the country. Which is it's historical status in any case. It is diverse and demonstrates the struggles of colonial Australia like no other place.

Residential and commercial towers in the proposal over four storeys is an outright threat to all of that heritage, its listings of significance and even to jeopardise the World Heritage of Old Government House. Who could dare contemplate deliberately doing that?

Design

The proposal fails completely to consider the fundamentals of design - character, location, siting, bulk, scale, shape, size, height, density, overshadowing, solar access, external appearance and the relationship of development to the size and shape of the land and most importantly - any, that is any, impacts on the surrounding area.

Impacts on Australia's Heritage Village

The impact of development on adjoining land and on the surrounding area is a legal requirement quite outside the Environmental Planning & Assessment Act, 1979 (amended).

The proposal impacts adversely upon the very best of early colonial heritage in this country - indeed, it can almost demonstrate in its diverse buildings, all the difficulties and hardships of over 150 years of colonial history.

Basics

For a 'drop-in' session I attended recently, evidence is still required to demonstrate if there is depth to the proposals. A couple of copies of substantial documents could have been used as reference where questions arose from the exhibited A3 colour-block display. These display panels were virtually unreadable. Reverse printing is the equivalent of a 2-3 point size reduction so affects readability/legibility. I had trouble seeing street names and finding North Points - and, is it true North or magnetic North shown as they differ more than 10°? That is integral to solar access. Precinct map size is totally inadequate; yet that is where the combined information resides and the people wish to know. A whole A3 page could have simply outlined the aims, definitions and contents of a larger document with proper legible plans and clear, prominent North points; even the brief and proposal stages.

The red paragraph for example *The Parramatta North Urban Renewal will reinforce Parramatta as the gateway to Western Sydney* is superfluous when people come for substance, not marketing.

This session was curtailed due to a frightful storm. I understand those who attended were contacted about another consultation, on Monday, midday. I signed the form on the night of the storm but was not contacted. To choose another time to the previously shortened display immediately rules out the ability of some people to attend due to work commitments, medical appointments, previously diarised commitments, etc. For me, Monday evening would have been possible - midday was not.

Essentials - solar access

I also need to see shadow diagrams over each heritage item and gardens for each proposed new building at its maximum height for June 21-22 and December 21-22.

Absence of this vital information certainly puts Australia's heritage in Parramatta at the bottom of the pile. It is called 'damp'; mildews, moulds, rotting timbers, etc., what about rising salt? What about maintenance costs of such problems over the long term?

The proposed height of buildings is a death knell to our heritage because of these dangers and the limit to atmospheric controls (air conditioning) permitted in heritage buildings. In this case there are already very mature trees in and around the designated heritage sites which have protected listings. Shadow from buildings greater than four storeys cannot be contemplated. The northern aspect to the heritage strip/precincts is unfortunate so special attention has to be applied to this real constraint of proposed buildings, even of four storeys.

All the above are essential basics before any thought of *rezoning*. Once *rezoned* it is too late.

In effect, the proposal has adverse impacts upon other lands in the locality/surrounds, let alone the irreplaceable heritage importance of the Cumberland/Sports and Leisure precincts. Weather can be a death sentence to such buildings with related problems coming from damp.

There can be no buildings on/within any of the Parramatta North Heritage precinct strip from the Gaol to past the swimming pool complex. It affects St. Patrick's and the Old Kings School and its site - both heritage. Where is this Urban Growth proposal coming from? It is be the ultimate folly.

All this raises the question; what prevails - this proposed N.S.W. Government proposal or Parramatta City Council's Local Environment Plan? Both completely unacceptable.

Australia's heritage

resides right here in North Parramatta. Any structure east of Fleet Street must be fully out of sight when viewed from Old Government House and Parramatta Park. The National heritage is concentrated in and around the land which holds the most significant collection of interrelated buildings born out of the site itself and to meet the multiple and pressing needs of people from those earliest colonial days. They are virtually on one long linear site for ease of management. So much has already been lost, so there can be no diminution of these lands West of Fleet Street or any development within that site. Only sympathetic re-use.

I would like a catalogue of how much significant heritage, site or building, which has been substantially altered or lost to date. This is an exercise for Urban Growth/their consultants as it must all be thoroughly documented. Enough is enough! Perhaps another organisation should undertake this as I understand that not too long ago, the proponents did not know that the Parramatta Swimming Pool would be overshadowed by two proposed buildings. That pool is the only one in the area for ratepayers or visitors and already has to handle greater densities. Fundamentals to any study is a detailed documentation of the subject sites first.

Knowledge forgotten - how? Yet serious threats

Detailed site inspections are essential to underpin any type of planning. An early public exhibition which showed the people nothing was actually held at the Parramatta Swimming Pool. The two buildings to obliterate the pool are to be erased completely. They will also be easily seen from Old Government House and so are a direct challenge to it's World Heritage listing. Another proposal to keep heights down at the corner of O'Connell Street and Victoria Road has already been undertaken. There is no role for any building(s) at all near the pool.

Curtilage

Heritage needs its curtilage. That is, what land is essential to an individual heritage item to show the viewer of that heritage, the impact of that siting on the people of that period in order to appreciate its full value. It is not just standing before the heritage item but the approach.

View catchments

A glaring failure was view catchments. This is Australia's heritage. If that doesn't put our heritage as a low priority, nothing does. The only arrows I saw were along streets to Parramatta Park.

View catchments are only shown TO PARRAMATTA PARK along existing streets between new buildings. Excuse me - curtilage encompasses clear views OUT of the heritage item which reflects the period it was built, AND IN TO the heritage item unimpeded, both being at least a 90° arc from a centre point of the heritage item.

(see submission in post for full drawing)

OUT ✕ IN ✕

View catchments in the exhibited documents are just using the jargon and hoping no one notices. There are no view catchments provided for heritage in or out in the exhibited plans. Proper view catchments serve to frame the amazing heritage we have, enhance that heritage to give it the relevance to its period, ensure the 'WOW' factor for its intrinsic self, locals and visitors from around the world. An emasculated, dried-up, shrivelled treatment of the whole send a very clear message that the proponent is being made to come up with some suggestions and is insincere about (a) ensuring the future of Australia's heritage, and (b) the profit factor is the driver. One look at the plans is virtually a rubber stamp to make this 'one-off' national heritage only a rump. The tourist grapevine will be derisive as many people have travelled widely, know and can see what is really treasured; so there goes significant income.

Direct Threats

The whole project threatens many heritage listings from the subject sites, buildings and sites in Parramatta Park itself and the whole heritage strip, Cumberland precinct and beyond.

Existing use of public facilities

There are two buildings proposed right against the Parramatta Swimming Pool. The pool was completely overlooked. Neither of these can be seriously considered in any form and they must be completely deleted for any form of development. This is an absolute NO - for any building here at all. I had been taught that the first study essential is a site inspection.

Traffic

I did not see any road widening proposed in the North Parramatta area. To even imagine the generator effect of buildings proposed, let alone a substantially reduced density maximum

of four storeys opposite the whole heritage precinct, is quite impossible in the present street system. Increased resident numbers mean an equal demand for carparking spaces and businesses (I presume there would be several small businesses at Ground Floor level in each building) need customer parking. Should we be fortunate enough to build up tourist numbers, bus tours also need to have street parking, where would they go? Can they manoeuvre around those streets, the current 'Turn left only', 'turn right only', etc. is irrational for visitors. Tourist parking MUST be off-site. Who could pay for land resumptions for these 'afterthought' provisions when there are four-storey buildings with several storey basements in the way.

A nightmare, which will kill off a real tourist industry we have waited for over many decades.

There are already great demands on North Parramatta for multiple reasons; religious services at St. Patrick's Cathedral, sport and training at Parramatta Stadium, sport, leisure and training at the Swimming Pool, increased densities to date. Then consider customers/ employees in new small business and commercial undertakings in proposed new four-storey buildings, east and uphill of the greatest heritage strip in the country. So where will tourists (by car) go? Where do the tour buses go?

N.B. *In January 2012, I noted that Featherdale Wildlife Park had purchased about six (6) houses with land to provide for its overflow parking needs.*

Obviously - a failed proposal

The proposal fails to consider the essentials and basics, impacts beyond the proposal, intends to put tall buildings within the heritage precinct as well as overshadow such buildings and gardens from developments of great heights across Fleet Street, threatening the longevity of the materials in heritage buildings and rebuilding of kitchen and other gardens where they were.

Action

The proposal must be withdrawn in its entirety. It is a death knell to the greatest heritage strip in the country and all these most inappropriate components threaten it actually and legally.

This is an absolute NO - a rejection of any building here at all in the Heritage Cumberland Precinct and the Sports and Leisure Precinct. Even for a Heritage Rescue Programme there is no infrastructure plan.

It seems as if the proponents have no other ideas as how to protect and rehabilitate our heritage, than multiple tower buildings. When in fact, that actually threatens all existing heritage listing including Old Government House. And even intends to ignore the essential Parramatta Swimming Pool. That is irresponsible and unacceptable to anyone in Parramatta. It cannot be contemplated.

Some questions

1. Any four-storey development on the east side of Fleet Street could also have an equivalent depth, especially as a quarry pre-existed in part of that area.
2. Who owns the land on the east side of Fleet Street?
3. Who gets s.94 contributions? Council or the N.S.W. Government? Or, will there not be any?
4. Values to any four-storey building opposite the heritage strip will increase exponentially only AFTER the national and world heritage is secured.
5. What prevails - this proposed N.S.W. Government proposal or Parramatta City Council's Local Environment Plan? Both should be scrapped in the interests of our city, the national heritage located here and the real possibility of a proper, thriving tourist industry. This proposal before us threatens it all.
6. What are the planning control changes for the Cumberland Precinct and part of the Sports and Leisure Precinct.
7. The four-storey buildings east of Fleet Street should have a continuous colonnade so tourists could shelter in the event of inclement weather. (Bad experience in Berlin.)

I was away for several months this year so was unavailable for some of the consultations.

Thought bubble - amalgamation of non-heritage sites east of Fleet Street

SURELY, there are better way of doing things.

Amalgamation is about the only measure I can think of immediately. It would require a deal of work but could reap benefits. Other ideas are circling.

For example, two commercial/residential buildings could be on a common side boundary, or become one; siting and design could be more flexible allowing optimum treatment of solar access and less shadow for all buildings, especially Australia's heritage. On a big picture - imagine the private land as a greenfields site and design lower developments, with wider options for orientation ignoring previous boundaries. More open space could be released to reflect what should be enhanced parkland and view catchments for the significant heritage in this area. Surely, there is/could be some mechanism to subdivide buildings upon completion (as per a duplex/ strata) commensurate with the land area of the original holding and the size of the building. Obviously such agreement would have to be in place before the process began, let alone planning and actual construction plans.

The issue is that all the heritage is interrelated and cannot be stand-alone projects in the planning or divided by any "infill". "Infill" anywhere along the heritage strip - Cumberland Precinct is not to be permitted - EVER! Four-storey buildings opposite should be striving to complement this superb gift from those colonial settlers, not trashing it. There is no money in that! The outcome will be far cheaper in the long term if it avoids 'afterthoughts' which are always very awkward aesthetically and less effective functionally. Where would the

money come from to acquire and demolish some of those buildings opposite the heritage strip on the East side of Fleet Street.

Just think of the significant parking requirements of a successful tourism industry.

(Mrs.) E. Boesel

Department of Planning & Environment
23-33 Bridge Street
SYDNEY NSW 2000

19 December 2014

SUBMISSION:

Re: UrbanGrowth NSW proposed changes to planning laws Parramatta North Potential State Significant Site (Parramatta Local Environmental Plan 2011 and Parramatta City Centre Local Environmental Plan 2007).

Firstly, I consider that the deadline for submissions is too short and the extent in informing the community both locally and regionally far too limited. That the proposed changes and plans need broader consultation and input from a wider sector of the community.

I ask that the submission deadline be extended to at least 27 February 2015. Further, I have activated a petition in support of this extension which is now attracting interest and signatures.

As a participant stakeholder, I was disappointed to see proposals for residential development on the actual historic footprint of the Cumberland Precinct, specifically the Female Factory 3rd Class Penitentiary Yard and within the Norma Parker grounds. I am also greatly concerned about the number, height and density of residential blocks on the Kamballa portion and strongly believe that such would be detrimental to heritage values, environment and the enjoyment of the site.

Additionally I have serious concerns regarding access, transport, parking (visitors, workers, and residents) and infrastructure, the loss of community facilities, public space, and the excessive demands placed on the fragile environment of the river and heritage sites associated with over-development.

I find that despite all the references to heritage significance the documentation contains no proposals for accessing, interpreting and celebrating that heritage. Nor is there any mention of an integrated precinct management of the 'whole' by a single government agency. Management of 'fragmented' parts of the site by new apartment dwellers' body corporates, lessees of individual buildings or individual clusters of buildings would be highly detrimental to the long term conservation of the Heritage Listed Precincts.

These considerations should be dealt with up front before any rezoning is contemplated so that the public is presented with the full implications of this development proposal.

In concluding I support the following points made in the National Trust Submission -

- strongly oppose the use of a proposed State Significant Development Declaration to switch off the Heritage Act and remove the Heritage Council as a determining authority for a development which impacts severely on a number of State Heritage Register Listings.
- support sensitive and appropriate development (primarily sensitive adaptive re-use) to provide for ongoing heritage conservation and presentation.
- believe that the excessive development indicated in the concept drawings will become even more intensive given the past history in Parramatta of Section 75W applications to increase building heights.
- urge that the study area be extended eastward to take development pressures off the heritage areas and to preserve much needed open space for the increasing Parramatta population in coming decades.
- strongly oppose new multi-storey buildings in the Female Factory
- urge that parking considerations be dealt with up-front before any rezoning is contemplated so the public is presented with the full implications of the development proposal.

- urge the retention of the Central Male Block which is of “high significance”.
- urge that the development proposal have proper regard to the Conservation Management Plans prepared for the NSW Heritage Council in conjunction with the State Heritage Register Listings. The scale and quantity of development proposed in contrary to the policies of the Conservation Management Plans.
- oppose the construction of a 6/16 storey building directly adjoining the Recreation Hall, Chapel and Parramatta Gaol.
- urge a continuing integrated precinct management of the whole site by a single government agency to ensure the long term survival, co-ordinated maintenance, conservation and presentation of this state and nationally significant cultural landscape.
- seek the close involvement of the Aboriginal Community in decision making regarding this project.
- oppose the demolition of the highly significant residence of the Chief Attendant, 9 Fleet Street.

The development of the North Parramatta heritage sites should lead as a world class exemplar of urban renewal and not be determined on the basis of how many residential dwellings can be developed on the site.

Whilst I recognise the need to revitalise Parramatta North and preserve and protect its heritage sites, I believe changes to planning controls and the proposed State Significance Site declaration will not afford the protection that this precinct deserves.

Again, I strongly urge Urban Growth, Department of Planning & Environment to **extend the submission date to Friday 27 February 2015.**

Yours Sincerely,

Bonney Djuric

Founder

Parramatta Female Factory Precinct Memory Project & Parragirls

PO Box 2028

North Parramatta 1750

By email: bdjuric@tpg.com.au

19 December 2014

Louise Mansfield

From: Stephen Brancatisano <sbrancatisano@hotmail.com>
Sent: Wednesday, 15 April 2015 6:28 AM
To: information-Planning
Subject: Attn: Anna Johnston, Senior Planner: Submission re Parramatta North Urban Renewal

Anna Johnston

Senior Planner

Department of Planning & Environment

GPO Box 39

Sydney NSW 2001

Re: Parramatta North Urban Renewal

Dear Ms Johnston,

I am writing to express my opposition to the declaration of the Parramatta North Urban Renewal Area as a State Significant Site as currently proposed by Urban Growth NSW ('Urban Growth').

The primary basis of my opposition is that Urban Growth's proposal will have a significant impact on the heritage values of the site. These heritage values are represented most significantly by the Parramatta Female Factory, the former Roman Catholic Orphanage, and the countless other highly intact relics of the early colony, as well as the area's significance to the traditional owners of the land, the Burramattagal people. These values are of national significance, and the development of the site as proposed does not have at its core the protection and promotion of both these natural and built heritage places.

In my view, and in the view of a growing number of Australians who are becoming aware of this proposal, this is short-sighted. Once this public land is sold-off for development in accordance with Urban Growth's current proposal, any opportunity to protect and promote the heritage associated with the site will be lost. Ideally, a revised proposal would have no, or very limited, residential development on the western side of Fleet Street.

Other issues with the current proposal include inadequate schooling, poor infrastructure and traffic planning, and significantly reduced public-private space ratios. These issues have been dealt with extensively in previous submissions.

I strongly urge you to consider rejecting the proposal in its current form and instruct Urban Growth to present an alternative proposal that both promotes and protects the heritage value of the area.

Kind regards

Dr Stephen Brancatisano

9 Moree Avenue



19 December
2014

Ms Carolyn McNally Secretary
Department of Planning & Environment
23-33 Bridge Street
SYDNEY NSW 2000

Dear Ms McNally,

RE: Parramatta North Urban Renewal Plan

The Parramatta Branch of the National Trust of Australia (NSW) makes the following submission on UrbanGrowth NSW's proposed Parramatta North Urban Development Plan.

Highest Level of Heritage Significance

The Branch argues that from a heritage viewpoint the North Parramatta Study Area has the highest level of Heritage Significance.

- It directly borders the Old Government House and Domain World Heritage Area –1788
- contains part of the *Old Government House and Government Domain* National Heritage Register listed area dating from 1788
- two sites listed on the State Heritage Register, the *Cumberland District Hospital Group*— dating from 1803 (the Mill Phase), and the
- *Norma Parker Correctional Centre* dating from 1841 (both listed in April, 1999)
- borders the *Parramatta Correctional Centre* dating from 1842, (also listed in April, 1999),
- borders the Wistaria Gardens (now known as the Wisteria Gardens) listed on the National Trust Register in 1993. Wisteria Gardens also contain the inscribed coping stones relocated from Ward 6 of the Parramatta Psychiatric Centre and listed on the National Trust Register in June, 1975.
- contains the *Parramatta Female Factory Precinct National Heritage Register* nominated area which is also being proposed for addition to the World Heritage Australian Convict Sites.

The Branch therefore believes that with this level of heritage significance the broader community would expect that the NSW Heritage Council using the provisions of the NSW Heritage Act, 1977, would determine development applications affecting State Heritage Register listed places.

The documents on public display clearly indicate that proper pre-development consultation with the NSW Heritage Council has not occurred or a more sympathetic and understanding development would have emerged that recognises the area's outstanding significance and unique heritage qualities.

The Branch therefore seeks that the advice and recommendations of the Heritage Council be sought before an amended Plan is developed and that such advice is ongoing throughout the life of the project.

Aboriginal Heritage and Cultural Landscape

The Branch is acutely aware of the importance of the Study Area to the Aboriginal community and it is felt that whilst Aboriginal culture and heritage is acknowledged and respected it is not fully demonstrated within the current Plan. The Park provides evidence of Aboriginal occupation, lifestyle and values prior to European occupation. The Cumberland Precinct undoubtedly contains contemporary historic values associated with the history of incarceration of Aboriginal children and adults. The feeling of openness and seclusion which contributes to an understanding of the cultural landscape of Parramatta Park should be maintained which would require limiting any high rise development that will have negative impact on this appreciation of the pre-contact Aboriginal landscape.

The Branch seeks that the advice and recommendations of the Aboriginal community be sought immediately and such consultation be ongoing throughout the life of the project.

The Impact of Height and Scale of New Buildings

There is an exceptional level of development proposed within the Study Area with two towers 30 stories in height, a 24 storey tower, three 20 storey towers, 16 and 14 storey towers, four 12 storey towers and 57 other residential buildings ranging up to 10 stories in height. From the consultative phase of the plans development the explanation offered for such densities was to meet the demands of a predetermined property yield of 4,000 residential units, which has no identifiable link to the funding required for permanent conservation of the heritage within the three State Heritage Register listed areas.

Recent decisions by the Parramatta City Council show that applications to vary and increase the heights of buildings beyond that originally proposed can be expected and in the majority of cases granted. Therefore it is suggested that the final appearance and height profile of this development can be expected to be far worse than that indicated.

The Branch seeks that the height and density of all structures be recalculated consistent with the number required to fund the required permanent conservation of the heritage within the area.

Principles of Quantity and Scale of New Development

The Branch supports the principles outlined in the 1998 *North Parramatta Government Sites Conservation Management Plan* prepared by the Department of Public Works and Services Heritage Group which states:

- *Ensure that the setting of the North Parramatta Government Precinct is treated in a manner that recognises its significance as an item of environmental heritage.*
- *New work should consider the reinstatement of known missing elements and, where appropriate, sympathetic adaptive new design.*
- *The layout (evidence of spatial planning), integrity, plant diversity and maturity of the landscape constitute a major component of the setting of the place. These elements should be conserved.*
- *Within the North Parramatta Government Sites each of the separate institutions has a distinctive setting character, which is partly based on its layout. The integrity of the setting and layout of the North Parramatta Government Sites should be maintained.*
- *Any new development on the site should enhance and express the significance of the place. It should support and not obscure the significant elements and design principles of the formal layout.*

The Branch believes that these principles should be applied within the following precincts:

- Precinct 05 where the existing single-storey building is to be replaced by two six-storey buildings and an eight-storey building. An eight storey and two six storey buildings directly adjoining the Parramatta River will also impact on the views along the Parramatta River.
- Within Precinct 03 where the present single-storey building is proposed to be replaced by a four- storey and a twelve storey building.
- Within Precinct 04 where the single-storey Gardener's Cottage is proposed to be replaced by a 6-storey and a 16-storey building. The 16 storey building on this site is ill-conceived as it would be highly damaging to the setting of both the Recreation Hall and Chapel and Parramatta Gaol.

The Branch seeks that the height and density of all structures be recalculated consistent with the principles outlined in 1998 *North Parramatta Government Sites Conservation Management Plan*.

Construction of New Buildings Within National Sites of High Significance

The Branch strongly opposes the development of three new buildings (a six-storey, four-storey and three-storey building) within the 1803 Female Factory Precinct. In this regard the Branch supports the view that new development within the Female Factory/Asylum Sub-precinct should be limited to the appropriate adaptive re-use of existing buildings. In particular construction of a six storey building on the site of the 1838-1839 Gipps Female Cell Block and near the archaeological remains of the 1818 diversion of the first Mill Race for the Government Mill is considered untenable.

The Branch seeks the removal from the current Plan of the three new buildings within the Female Factory Precinct and the six storey building in the Gipps Female Cell Block.

The Provision of Onsite Parking

The documentation put out for public comment makes no reference to on-site parking provisions and likely constraints from archaeology and probable high water tables near the Parramatta River. The Branch is advised that car parking for 4,000 apartments would likely equate to 3,000 cars or 100,000 square metres of car parking space. How this will be achieved is not addressed in the proposal.

It is anticipated that construction of major underground car parking in situations where nationally significant archaeology occurs and where high water tables may be present would prove very costly and in some instances, the car parking may have to be integrated into the buildings' design.

The Branch seeks assurances that all parking issues be resolved before any rezoning is contemplated so that the public is presented with the full implications of this development proposal.

Land Ownership and Control

The Branch believes that in the interest of the maintaining the interdependent heritage values across the whole site there must be integrated precinct management of the 'whole' by a single government agency. Management of 'fragmented' parts of the site by new apartment dwellers' body corporates, lessees of individual buildings or individual clusters of buildings would be highly detrimental to the long term conservation of the Heritage Listed Precincts.

The significance of the State and National Heritage Listing lands within the Study Area is largely based on the long and unbroken line of government ownership virtually from the First Settlement of Europeans till the present day.

The Branch seeks assurances that the land remains in State Government ownership and ultimate control, through long term leasing arrangements.

The Hospital's Landscape Scheme

The hospital's landscape scheme was established by the 1890s. The pathway system, garden areas and shrubberies throughout the hospital were established with orchards, vegetable gardens and vineyard on the periphery. Trees were supplied by the Botanic Gardens and plants listed as being supplied in the still survive on the site today.

The National Trust Register 1996 listing of the Cumberland Hospital Landscape sets out in detail the reasons for listing - historic significance, aesthetic significance, social significance and scientific significance.

The Branch seeks to gain assurances that the magnificent hospital landscape will be placed under a custodian who will ensure ensure its long term survival and provide for its long term maintenance, conservation and presentation.

Retention Central Male Block

The Central Male Block (Male Asylum) is classified as "Moderate Significance" in TKD Architects Built Heritage Assessment. However it is noted in to other assessments (1998 Department of Public Works and Services Heritage Group North Parramatta Government Sites Conservation Management and 2010 Perumal Murphy Alessi Conservation Management Plan Plan) the this building is listed as "High Significance."

The Branch strongly supports the "High Significance" of the Central Male Block rating and seeks a review of the current classification to ensure its retention and sympathetic adaptation.

Reliability of the Photomontage Technique

The Branch is deeply concerned the accuracy of photomontages which form the basis for the conclusion that the impact of the development on the Old Government House and Domain World Heritage values is acceptable.

It appears that the photomontages from page 75 are misleading in that some of the images have been composed to include the greatest number of trees in the mid-ground, effectively obscuring the outlines of the buildings in the background. For example:

- Figure 51 is taken from the top of a set of stairs. Stepping down just six steps would produce a completely different view with a ridgeline of tower
- In Figure 59 existing buildings can be seen clearly from the northern edge of the Park. However this image is taken so close to the river that they are all obscured.
- Other images are taken from totally wrong locations. For example, Figure 47 is taken from behind Old Government House instead of inside the tree line overlooking The Crescent. Figure 48 is taken on the road behind Old Government House instead of on the ridge line at the middle of The Crescent.
- In Figure 57 the view angle is approximately 160 degrees but the image shows only approx.

90 degrees. The northern edges of this view would clearly take in taller developments. Figure 64 is a north-east view (not north) and Figure 65 is again a north-east view not north-west.

- The number of sight lines looking into the Cumberland and Sports and Leisure Precincts are very limited indeed and consequently do not show any views with a high level of impact, with the exception of Figures 68 and 72.

The Branch seeks that photomontages are independently reviewed and presented in manner that overcomes the shortfalls outlined above.

Development within the ‘Highly Sensitive’ Zone of a World Heritage Site

The 6-storey and 4-storey mixed-use development along O’Connell Street, south of the Victoria Road intersection has a massive footprint. This development is not only within Parramatta Park but located within the ‘Highly Sensitive’ area of the World Heritage Site and would be visible from many parts of the World Heritage Area. A “mixed-use” development would surely not be an appropriate use within a ‘Sport and Recreation’ Precinct. Similarly the 8-storey mixed use development north of Victoria Street on O’Connell Street is subject to the same important heritage constraints as above.

The Branch seeks that the proposed developments in O’Connell Street be relocated outside the ‘Highly Sensitive’ zone of the World Heritage Site.

The Residence of the Chief Attendant (9 Fleet Street)

The Residence of the Chief Attendant (9 Fleet Street) was designed by the Government Architect’s Office in 1910 and the cottage was completed in 1911. This building is proposed for demolition for the construction of new 10-storey and 4-storey buildings. However the Department of Public Works and Services Heritage Group 1998 Conservation Management Plan finds this building to have “High Significance”.

The Branch seeks to gain assurances that the Residence of the Chief Attendant (9 Fleet St) will not be demolished.

In Summary the Branch seeks:

- that the advice and recommendations of the Heritage Council be sought before an amended Plan is developed and that such advice is ongoing throughout the life of the project.
- that the advice and recommendations of the Aboriginal community be sought immediately and such consultation be ongoing throughout the life of the project.
- that the height and density of all structures be recalculated consistent with the number required to fund the required for permanent conservation of the heritage within the area.
- that the height and density of all structures be recalculated consistent with the principles outlined in 1998 *North Parramatta Government Sites Conservation Management Plan*.
- The Branch seeks the removal of the three new buildings within the Female Factory Precinct and the six storey building in the Gipps Female Cell Block from the current Plan.

- that all parking issues be resolved before any rezoning is contemplated so that the public is presented with the full implications of this development proposal.
- that the land remains in State Government ownership and ultimate control, through long term leasing arrangements.
- to gain assurances that this magnificent hospital landscape will be placed under a custodian who will ensure its long term survival and provide for its long term maintenance, conservation and presentation.
- that the classification of the Central Male Block be upgraded to High Significance to ensure its retention and sympathetic adaptation.
- that photomontages are independently reviewed and presented in manner that overcomes the shortfalls outlined in this submission.
- that the proposed developments in O'Connell Street be relocated outside the 'Highly Sensitive' zone of the World Heritage Site.
- to gain assurances that the Residence of the Chief Attendant (9 Fleet St) will not be demolished.

The Parramatta Branch of the National Trust (NSW) appreciates the opportunity to make comment on this proposal and looks forward to contributing to future community inclusive processes that will work towards a positive outcome for the Precinct.

Yours sincerely

A handwritten signature in black ink that reads "Brian Powyer". The signature is written in a cursive, flowing style.

Brian Powyer
Chair Parramatta Branch of National Trust (NSW)

Emma Hitchens

From: Jacki Brown <newleafarb@gmail.com>
Sent: Monday, 5 January 2015 3:58 PM
To: Parramatta North Project
Subject: Parramatta North SUBMISSION & EXPRESSION OF INTEREST

Good afternoon,

I have been informed that the submission period for Parramatta North Urban Renewal has been extended to today (5 January 2015) and I appreciate the opportunity to give my feedback on the proposal.

I am a resident of North Parramatta, and the Cumberland Hospital site is important to me as green open space and heritage place. I am also an Arboricultural Consultant and Landscape Designer and would like to express my interest in being involved in the detailed planning of the precinct.

My main concerns are that the proposed increased density should result in “liveable” space, and that the existing trees and other vegetation be properly assessed, and appropriately planned for retention or replacement during planning of the entire precinct (rather than at individual site assessment stages, which will likely be too late to adjust boundaries or building footprints and infrastructure).

- The Cultural Heritage Assessment recommends retention of “significant trees”. In order to assess which trees these are, an arboricultural assessment is needed (carried out by a qualified Arboriculturist). Many trees have not been shown on the plans. Existing trees must be subject to **full arboricultural assessment**, to determine retention values and significance. Advice should follow current best practice arboricultural principles, which include tree assessment at site analysis stage to guide tree retention, involvement of the Project Arboriculturist in the design process to ensure that trees intended to be retained can be effectively managed, protected and designed into the development with current best practice infrastructure for tree cultivation. Tree retention should not be limited to “significant trees” – rather, retention of suitable trees should be prioritised, to avoid excessive canopy loss. New planting areas should be decided and planting should commence as soon as possible to reduce the impact of tree loss over the duration of the development.
- Proposed tree planting species should be revisited by a minimum AQF Level 5 Arborist, to consider potential size of planting locations, species suited to the local conditions, and maximising the appropriate use of endemic species.
- Wide verges (greater than 3m) should be included across the precinct to allow for large tree growth.

Heritage Significance

- The site is extremely significant in the history of Australian colonial history, and the buildings and associated structures and landscapes should be conserved. They are irreplaceable, and invaluable for their own sake as well as for their potential for world-class tourism.

Liveable space

- The precinct currently functions as part of the “green lungs” of Parramatta, along with Parramatta Park corridor. This is a great asset for Parramatta, like Central Park in New York, and once it becomes developed it will be gone forever, so the need for green open space should be carefully considered in this process. The implementation of state of the art “green buildings” such as One Central Park in Sydney CBD would make the precinct a destination, adding to its value. The area should be walkable (trees shading footpaths, and spaces connected) and provided with public transport.
- The area should be liveable for nature and wildlife as well as people. The habitat of the Flying Fox colony along the river needs to be protected. Additional “bushland” areas should be rehabilitated.

If you have any further queries, please don't hesitate to contact me.

Kind regards,

Jacki Brown

Arboricultural Consultant | AQF Level 5 (Dip Hort. (Arb))

Accredited Member of the Institute of Australian Consulting Arboriculturists (IACA) | Member of the International Society of Arboriculture

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New Leaf Arboriculture

ABN 58 110060644

Emma Hitchens

From: Jason Burcher <jason@riverlands.com.au>
Sent: Friday, 9 January 2015 11:58 PM
To: information-Planning
Cc: Emma Hitchens
Subject: Parramatta North Urban Renewal Planning Framework Application

Dear Ms Carolyn McNally,

Re: Proposed changes to the Parramatta Local Environment Plan 2011 and Parramatta City Centre Local Environment Plan 2007.

As a self described 'Development Champion' who's goal is to address barriers to private sector investment in development projects in New South Wales, Urban Growth NSW is clearly the wrong proponent to masterplan the restoration and activation of one of this country's most culturally sensitive landscapes. Urban Growth NSW's complete unsuitability to manage this process is made vividly clear by examining the horse before the cart approach found the exhibited PNUR Planning Framework Application - which places the intention to 'de-risk' and 'dispose' of what is deemed government land that is 'surplus to needs' ahead of the social, civic, cultural and environmental needs of the people who live, work and play here in Australia's most populous local government area.

I strongly oppose the declaration of the Parramatta North Urban Renewal Study Area as a State Significant Site. The PNUR Planning Framework Application coupled with it's State Significant Site status removes established processes and protection mechanisms vital to the survival of the site's many intact built heritage and ecological features.

The Parramatta North Urban Renewal project promised to deliver a vibrant new mixed use zone incorporating a revitalised heritage precinct, housing and employment, while honouring the rich cultural history embedded within and planning for the needs of future generations. However Planning Framework Application put forward clearly shows that Urban Growth NSW's mandate has trumped any desire to deliver on these prior commitments. It also appears to deliver a significant net loss in public open space to the local community, delete all of Parramatta Park's existing bulk parking facilities as well as one of Parramatta's most cherished public amenities and leave the ratepayer with a huge capital expense for replacement of that amenity. It also squanders the one opportunity we have to restore Parramatta Park to it's formerly much broader proportions and deliver a public space befitting Sydney's geographic urban heart and second CBD. In fact the plan for the site, as it is proposed, also promises to deliver a devastating outcome for the people of Parramatta in terms of traffic congestion, city planning, future economic potential of tourism and the arts, cultural development, social cohesion, public amenity, outright livability and, perhaps worst of all, the wholesale destruction of our cultural relics in the 21st century. It nullifies fundamental protections, locks out the rights of relevant stakeholders, slices up the land and it's assets and disposes of it's dismembered pieces while stacking the interests of both present and future stakeholders against each other along with that of the remaining flora and fauna, open space and built heritage.

New uses which are to be imposed on the site, far from enhancing the heritage, will serve only to detach it from it's formerly embedded narrative. After all, no one wants to say they live down at the Female Factory, Asylum, Orphanage, Hospital or Gaol and, regardless of whether these important places are stacks with units or not, no one ever will. The destruction this plan is set to leave in it's wake will be truly devastating not just for the people of Parramatta but for all Australians.

Building apartment blocks in place of former cell blocks, inside prison walls, where buildings deemed to be of high significance now stand and in place of ecologically and scientifically significant trees is not an appropriate way to revitalise the heritage precinct and honour the rich cultural history embedded within the site. Nor is selling off this important open space for residential infill an appropriate way to plan for the needs of future generations. It does however promise to crowd out what manages to remain present and relevant in the shade of the surrounding tower blocks and in direct competition with new priorities imposes on the site which must inevitably be balanced against the site's other 'potential' use(s).

The plan put forward is lazy, excessive, unsympathetic and (as the provided renderings show) promises to destroy the entire aesthetic of this wonderful place before Australian's are even given a chance to enjoy it. It lacks a credible plan to ensure the proper and uniform upkeep and management of the site's many intact natural and built heritage features and instead proposes to split the site into no less than two dozen pieces before then being sold off predominantly for residential development. Far from protecting and revitalising the heritage precinct, Urban Growth NSW's plan fragments the site and places the fate, future upkeep and protection of it's many treasures into the hands of cash strapped body corporates.

PARKING

It is understood that making parking available within the heritage precinct runs counter to the proposed traffic management plans aimed at limiting traffic generated by residents living in the new developments planned for the site. Lack of suitable grade level parking to ensure adequate and relatively easy access is afforded to visitors will limit the potential of any commercial adaptive reuse of heritage buildings within the site. Consideration should also be given to accommodating the needs of our aging population and those with mobility issues who cannot simply walk a greater distance or manage with public transport alternatives to private car travel. Parking access is an important part of any modern public space and should not be limited here.

TRAFFIC

The maximum queue lengths recorded in the Traffic and Transport Review are simply not based in reality, with some maximum queue length underestimated by up to a kilometre or an entire order of magnitude. This is extremely worrying to me as a local resident.

SCHOOLS

Schools within the relevant range of the development area are already largely at capacity. Land previously used for Parramatta North Public School falls within the development area however the PNUR Planning Framework proposes that this land be rezoned for residential use - reducing the land available for educational uses. The planned development will attract approximately 800 new primary school aged students to the area, however no provision has been made within the development area to meet the needs for these new students. The same issue exists with high school aged children. These issues should be addressed before any rezoning occurs.

LAND LOTS

LOT A1 - 31080sqm (4 + 4 + 8 + 30 storeys)

* The proposed development height is completely out of scale with surrounding light industrial area. Any rezoning of this individual parcel of land should be done as part of a larger rezoning effort that allows for the rational growth of existing 3-4 storey residential and single storey light industrial either side of Church St.

LOT A2 - 4649sqm (6 storeys)

- * Vehicular carriageways should be set back against the boundaries and away from the Superintendent or Deputy Superintendents residences so to maximise curtilage around heritage buildings.
- * Indicative Building Footprint offers no separation from heritage structures.
- * 4 and 6 storey and is completely out of scale with the existing two-story structures. 2 and 4 storey would be a better compromise.
- * Overshadowing of heritage structures will be unacceptable.
- * Visual impact of proposed development will destroy picturesque setting of heritage structures.
- * It is important that the Superintendent or Deputy Superintendents residences should remain in State Government ownership and ultimate control and made available for development through short or long term leasing arrangements.
- * There is no public open space within the lot and no public access is given to either the Superintendent or Deputy Superintendents residences. Provision for public open space within lot should (at a minimum) provide an access corridor from street both Superintendent or Deputy Superintendents residences.

LOT A3 - 5337sqm (6 storeys)

* PERFECT!!!

LOT B - 49142sqm (4 + 4 + 6 + 8 + 8 + 12 + 20 storeys)

- * There is public open space within lot (other than the access road itself) and no public access to either brick or stone walls. This should be improved.
- * The 8-storey triangular indicative building footprint at the north end of site occupies land shown on the 'Open space types and locations' map on page 39 of the Summary Document as Proposed public open space. Needless to say, an area of land occupied by a tower is not going to be very useful to the public as open space.

LOT E3 - 16488sqm (6 + 6 + 16 storeys)

- * Public Open Space does not extend to the main entrance of the Recreation Hall. This should to be improved.

- * Indicative Building Footprint covers important trees like the Bunya on alignment with Pine Cottage. These trees are an important part of the landscape and must be retained if the site is to have a hope of retaining it's former beauty.
- * The Gardeners Cottage which was built c1899 and later extended by Walter Liberty Vernon in 1910 is of high significance and should be retained. The Built Heritage Assessment accompanying this rezoning application also recommends the retention and adaption of the Gardener's Cottage.
- * 16-Storey height is extremely intrusive on the site visually and blocks the view of the gaol from the main public space (the Oval) and female factory. Any new development on this site must be kept below the height of the gaol wall so not to block the view of the Gaol from other areas of the heritage precinct.
- * If the PCC Pools are to be lost then the pool behind the Recreational Hall could be retained and made available to council for use by swim schools displaced by rezoning of land on north eastern extent of Parramatta Park.
- * If PCC is to loose the ability to continue to lease the current site of the Parramatta Memorial Pools for a peppercorn payment, then provision of the existing pool facilities in this lot should be retained to allow for the continuation of the peppercorn lease arrangement with PCC to, at an absolute minimum, continue to provide limited swimming facilities for use by the various swim schools who currently relying on the location, facility and affordability of the current PCC pools. The PCC pools also provide an important public amenity to the community by providing an affordable and easy to get to place for meetings and events - such as the initial public exhibition of the Parramatta North Urban Renewal Project hosted by Urban Growth NSW at the Parramatta Swim Centre program room back on the 21st of November 2013. It would make sense that the Recreational Hall and the adjoining pool both be suitably upgraded and made available to council to replace amenity taken by changes proposed to Parramatta Park elsewhere in this Master Plan.
- * This lot is totally unsuitable for residential development.
- * This lot should remain in State Government ownership and ultimate control and be made available for adaptive reuse through short and/or long term leasing arrangements.

LOT F1 - 12996sqm (3 + 3 + 6 + 12 storeys)

- * Pubic Open Space does not extend to the main entrance of Jacaranda House.
- * Indicative Building Footprint of both 3-storey structures are intrusive and do not allow for suitable curtilage for Jacaranda House.
- * The Former TB Ward is a moderately significant structure that was built c1935 (C Parkes) which, while not currently listed, has merit and should be considered for retention in master plan. With the unsympathetic additions removed and the structure restored it could easily serve as an ablutions block or a place for bicycle/segway hire, tour operator, gallery, interpretation centre or other community focused activity or adaptive reuse.
- * The 6-storey structure is far too close to riverbank and is intrusive on the riparian corridor.
- * Both 6 and 12-storey structures overlook and negatively impose on the mostly intact natural view east from Arthur Phillip's campsite (24 April 1788) on the opposite bank. The picturesque nature of this site should be protected, restored and maintained as a cultural landscape feature and important environmental conservation area.
- * Vehicular access toward the river is undesirable, divides what should rightfully be public open space and only serves to provide access to unsympathetic residential development.
- * This lot should remain in State Government ownership and ultimate control and be made available for adaptive reuse through short and/or long term leasing arrangements.

LOT F2 - 1865sqm (3 + 3 + 3 + 3 Storeys)

- * Pubic Open Space does not extend to the former female ward (c1908), Former Nurses Administration Building (c1909) or Former Male Ward 7 (c1909)
- * Unsympathetic additions from 1962 and 2000s should be removed to reveal and restore original Vernon vision for the precinct.
- * Indicative Building Footprint for all four 3-storey structures are intrusive on the original Vernon design and destroy the link between these 3 important buildings. An example of the only sort of additions that would be appropriate in the proposed footprint would perhaps be a low impact single storey structure (glass and steel) suited especially for the purpose of dining or simular commercial use which is complementary to appropriate adaptive reuse by the public.
- * The vehicular access toward the river is undesirable, divides what should rightfully be public open space and only serves to provide access to unsympathetic residential development.
- * This lot is totally unsuitable for residential development.
- * No part of this lot should pass from public ownership. The Vernon buildings, suitably restored to their pre 1940s layout, should remain in State Government ownership and ultimate control and be made available for adaptive reuse through short and/or long term leasing arrangements.

LOT F3 - 15133sqm (1 + 2 + 4 + 6 Storeys)

- * Former Central Male Block is of high significance and should be retained. It's long and tall open indoor areas and enclosed outdoor spaces would lend themselves well to a range of community uses, such as an art gallery or museum.
- * The Former Female Asylum Kitchen Block and the adjacent Sheds were both designed by James Barnett and built around the same time and are of equal significance. These structures are complementary and should be retained, with the former link between them restored.

* The alignment of the proposed 'Main Street' running east to west along the southern boundary of the Former Female Asylum Kitchen Block is extremely poorly chosen and, if selected, would inevitably cause future problems and potentially lead to the future demolition of Pine Cottage to allow for an improvement in the compromised road alignment. Proposing to direct any amount of traffic through this little chicane is silly, potentially unsafe, splits the site poorly and leaves no curtilage around important heritage structures. NOTE: It seems that the choice to place a roadway along this alignment is not even consistent with the proposed rezoning lots, and may perhaps just be a reaction to the removal of DP 734689 from the Master Plan area.

* Suitable space should be allocated within this lot to accommodate a bulk area of grade level parking spaces for use by the visiting public, tourists, students and those patronising the merchants occupying the nearby heritage buildings (trades might include cafes, restaurants, museums, tea rooms, boutique retailers or specific educational and cultural uses relating to the site's rich history) as the space exists within this lot to do so.

* This lot is unsuitable for residential development.

* Pine Cottage is not present in the Artist's Impression of the Cumberland Precinct (aerial image looking south over Oval which has been supplied to the media and which can be found on page 36 of the summary document). This is a concern and seems to show that the Government's own draft designs omits this significant heritage item, even though it is supposed to be retained.

* No part of this lot should pass from public ownership. The Former Female Asylum Kitchen Block and Sheds, Pine Cottage, Former Female Asylum Store Buildings, Former Male Hospital and Day Rooms and Former Male Central Block, should remain in State Government ownership and ultimate control and be made available for adaptive reuse through short and/or long term leasing arrangements.

LOT F4 - 16488sqm (6 + 6 + 8 Storeys)

* Public Open Space allocated is totally unacceptable, with the small area allocated to the public simply being the canopy covered area occupied by 3 figs trees.

* The Indicative Building Footprint of 6-storey structure on the northern edge of the lot penetrates several meters into the canopy area of the existing 3 fig trees which are identified as an important fauna habitat. This runs counter to the objectives set out in the EMP accompanying this Planning Framework Application.

* The Indicative Building footprint of the 6-storey structure on the south eastern extent of the lot extends right up to just a few meters from the edge of the current grade, leaving barely enough room for the public to pass along the waterfront. The experience from this vantage point will be terrible for the public, with no spatial separation from the 22 meter high wall of apartment towering above, casting a shadow on this critical public space for a good part of the day throughout the year.

* The height and width of the development proposed for this lot is completely imposing and out of step with the future use of this site by the public and as a focal point for tourism in Greater Western Sydney. This development will also be extremely damaging to the landscape as viewed from across the river in the grounds of Wisteria Gardens in and/or around Glengariff House.

* This entire lot should rightfully remain public open space.

* This lot is unsuitable for residential development.

* No part of this lot should pass from public ownership.

* This entire lot should be spared from development to be retained as much needed Public Open Space for the people of Parramatta and Greater Western Sydney as well as the many thousand of new residents that will be part of this exciting new development. This is important to protect the existing tree habitats as well as view lines across the river from the grounds of Wisteria Gardens and from the river itself as well as on approach via Asylum Bridge.

LOT F5 - 11547sqm (4 + 12 Storeys)

* This lot could possibly be reconfigured to allow the Indicative Building Footprint of new buildings in this lot not to conflict with established plantings, by moving the Indicative Communal Open Space to better suit the existing landscape features desirable for retention.

* Roadway running east to west along the northern edge of the lot is intrusive and unnecessary, eliminating (rather than restoring) suitable curtilage around the front of the Former Staff Dining Accommodation Building (c1909-1910 Vernon) so to allow easy passage of pedestrians, bikes, etc.

* This lot should replace LOT F3 (as currently nominated) as the 'Key Activation Site' or 'Town Centre' for this part of the precinct.

* Further uplift on this block might be tolerable provided uplift cross section is slender enough and if a better outcome and balance could be found in other lots so to deliver a contiguous public open space along the riverlands.

* An inspired landmark building design would be desirable for this lot. Something which is reasonably tall, terrific to behold and which tapers towards the top might work - especially if it's added height was utilised to provide the public with a much needed elevated public space from which to view the broader riverlands.

LOT F6 - 1856sqm (3 Storeys)

* Public Open Space allocated does not extend into the courtyard containing the Former Male Shelter Shed or to Former Ward 8. Both these structures are of the highest significance, with the Former Male Shelter Shed being particularly fragile and requiring an extra level of care that simply should not be left to the body corporate of a new development or similar to manage.

* The Indicative Building footprint proposed for new development within this lot is well positioned, however the building height of 13-metres is well above the existing heritage wall and thus will not only impose itself aesthetically onto the precinct it will also block views across to the female factory from other public spaces within the broader precinct - such as from the Oval or Recreational Hall. The height of this structure should be kept to 1-storey, with a 2-storey possible only if it can be pulled off elegantly and intelligently, minimising height so as to remain hidden behind the existing heritage wall when viewed from the north western aspect. If a 2 storey structure can be designed so that total height does not extend more than around 1 metre above the wall and in a way that emphasises the walled edge while imposing itself as little as possible on the outward facade of the wall then it might be possible.

* This lot, along with that of LOT F7 to the south (at a minimum) should be included in an expansion of the UNESCO World Heritage area that is currently limited to the Old Government House and the Old Dairy and their associated environs on the other side of the river.

* The former lake extension should be restored. It's original use was for bathing/swimming, thus this should be the future aim for this feature.

* Suitable space should be allocated within this lot to accommodate a bulk area of grade level parking spaces for use by the visiting public, tourists, students and those patronising the merchants occupying the nearby heritage buildings. It would also be beneficial to have an area big enough to park buses.

* This lot is totally unsuitable for residential development (NOTE - No residential use is proposed for this lot)

* No part of this lot should pass from public ownership. The Ward 4 North Range and West Range, Former Kitchens and Spinal Range, Former Penitentiary Sleeping Ward and Ward 8, South East Range, Lecture Rooms and Main Administration Building are of the highest national significance and should remain in State Government ownership and ultimate control and be made available for adaptive reuse through short and/or long term leasing arrangements.

LOT F7 - 5478sqm (4 + 6 Storeys)

* The Indicative Building footprint proposed for new development within this lot is poorly conceived and poorly sited. Retention of the plumber, electrician and carpenter's buildings would be preferable to the proposed new development and serve to maintain the period aesthetic of the enclosure. The proposed building height of between 16 and 22-metres is completely unacceptable and will dominate the site from all angles. The placement of the Indicative Building footprint for the 6-storey development will stand well above the existing heritage wall and surrounding heritage buildings and thus will not only impose heavily onto the site and ruin it's current aesthetic, but it will also dominate views into the precinct.

* This lot, along with that of LOT F6 to the north (at a minimum) should be included in an expansion of the UNESCO World Heritage area current limited to the Old Government House and the Old Dairy and their associated environs on the other side of the river.

* Suitable space should be allocated within this lot to accommodate a bulk area of grade level parking spaces for use by the visiting public, tourists, students and those patronising the merchants occupying the nearby heritage buildings.

* This lot is totally unsuitable for residential development. The proposal to impose >700 residential dwellings onto the site (as well as LOT F8 to the south) is totally offensive.

* No part of this lot should pass from public ownership. This lot contains the Institute of Psychiatry building which is constructed from the stones of the original main building, the town clock gifted to the colony by King George IV back in 1822 and the old Shelter Shed are of the highest national significance and should remain in State Government ownership and ultimate control and be made available for adaptive reuse through short and/or long term leasing arrangements.

LOT F8 - 24623sqm (4 + 4 + 6 + 6 + 12 Storeys)

* The Indicative Building footprint proposed for new developments on the north-eastern and south-eastern extents of this lot are poorly sited and their proposed use totally unacceptable for both environmental and moral reasons. The proposed building height of between 16 and 22-metres is completely unacceptable and will dominate the site from all angles, especially from within the lot itself or when viewed from Parramatta Park across the river.

* The public open space allocated does not extend to the Main Dormitory Building and Western Range and Chapel (1840 with additions c1850), Laundry Extension (c1860) or Bethel (c1862). All these structures (along with the Gatekeepers Cottage (c1943) are of the highest significance - requiring an extra level of care that simply should not be left to the body corporate of a new development or similar to manage.

* The 4-storey development along south-western boundary of lot will obstruct picturesque view of heritage building 'Bethel' from key vantage points within Parramatta Park.

* The 6-storey development form of on eastern boundary of area F8 will cast large shadow over heritage building (Bethel) in morning hours (particularly impactful in winter months)

* The new developments proposed for the north-eastern and south-eastern extents of this lot will place hundreds of residents within just a few meters of the camp of Grey Headed Flying Foxes roosting on the eastern bank of the river. In fact, when overlaid, the maps contained in the PNUR Planning Framework Application clearly show that the proposed Indicative Building footprints actually encroach right into the identified area of the roosting habitat. As identified in the PNUR PFA's Ecological Management Plan, the Parramatta camp of Grey Headed Flying Foxes has permanent status, is occupied by a population fluctuating between 10,000 and 20,000 individuals and is considered critical as a roosting habitat to the survival of the species. The supplied EMP also identifies the need to minimise potential ecological impacts of the development, reduce the risk of potential conflict between the Grey-headed Flying-fox (GHFF) camp and future residents and improve the ecological values of the site by enhancing the riparian corridor

and notes the likely impact of machinery noise within or near the core camp is likely to impact on the roosting location of this threatened species. To ignore the 300m ecological buffer identified in the DECCW Draft Grey Headed Flying Fox Recovery Plan due to the fact that much of the area within the exclusion zone has already been developed is not appropriate. At present there is no areas developed for residential use within the buffer zone to the north, west or south of the camp, with only a small number of residential properties located within the 300m buffer zone to the east (and very close to the farthest edge of the exclusion zone area). Dropping the radius of the buffer zone slightly shows that there are currently no residential properties within a 200m buffer zone. Yet the proposed new development outlined in the PNUR Planning Framework application imposes >3000 apartments on the site and within the buffer zone, with a large proportion of these placed directly on top of or immediately next to the colony of Grey Headed Flying Foxes. Public concerns associated with coexisting with bats is significant (peaking each year during breeding season), so rezoning land for high density residential uplift on the western boundary of the established bat colony will inevitably lead to the displacement of this permanent habitat critical to the survival of the species.

* Suitable space should be allocated within this lot to accommodate a bulk area of grade level parking spaces for use by the visiting public, tourists, students and those patronising the merchants occupying the nearby heritage buildings.

* Vehicular access toward the river is undesirable, divides what should rightfully be public open space and only serves to provide access to unsympathetic residential development.

* This lot, with the exception of the strip of land on the south-eastern extent of the lot with Indicative Building footprints for 6 and 12 story new development, is totally unsuitable for residential development.

* The proposal to impose >700 residential dwellings onto the site (as well as LOTF7 to the north) is totally offensive and completely incompatible with the lot's existing assets.

* This lot, with the exception of the strip of land on the south-eastern extent of the lot with Indicative Building footprints for 6 and 12 story new development, along with the Main Dormitory Building and Western Range and Chapel (1840 with additions c1850), Laundry Extension (c1860), Gatekeepers Cottage (c1843), Bethel (c1862) should remain in State Government ownership and ultimate control and made available for adaptive reuse through short and/or long term leasing arrangements.

* This lot, with the exception of the strip of land on the south-eastern extent of the lot with Indicative Building footprints for 6 and 12 story new development, should be designated a site of conscience.

LOT G1 - 44649sqm (4 + 6 + 6 + 8 + 10 + 24 Storeys)

* The Chief Attendant's residence (along with Bridgeway house on LOTG2 to the south) should be retained to allow the new site access and restoration of Factory Street entrance to be flanked by existing heritage structures - Both of which are fine examples of Federation architecture and would help to retain visual connection between Fleet Street and the heritage precinct beyond - significantly beautifying the entrance. The proposal to demolish these important heritage structures (in LOTG1 and G2) and turn the entrance into a walled canyon of 10-12 stories will destroy the spatial link between Fleet Street and the heritage precinct beyond, likely require the immediate or eventual removal of the rubble stone wall that flanks both sides of Fleet Street, and will serve to massively degrade the intact landscape.

* The Indicative Building footprint on the north-western corner of the lot should be reduced in height from proposed 6-storey and 22m height down to 2-storey so not to block view of Gaol wall and buildings from main public open space and other key locations within the precinct such as the Female Factory.

* The Indicative Building footprint on the south-eastern corner of the lot should be reduced to accommodate retention of the Chief Attendant's residence and it's height reduced from the proposed 10-story 34m to 6/4-stories 22m/16m so to minimise overshadowing of Chief Attendant's residence and Bridgeway Cottage.

* The Chief Attendant's residence should remain in State Government ownership and ultimate control and made available for adaptive reuse through short and/or long term leasing arrangements.

LOT G2 - 11753sqm (6 + 14 Storeys)

* Development of area G2 destroys the picturesque setting of the current entrance and landscape opposite the Main Administration Building and require removal of a number of trees and key plantings relevant this key open space area (Open Space #4)

* Bridgeway house (along with the Chief Attendant's residence on LOTG1 to the north) should be retained to allow the new site access and restoration of Factory Street entrance to be flanked by existing heritage structures Chief Attendant's residence and Bridgeway House - Both of which are fine examples of Federation architecture and would help to retain visual connection between Fleet Street and the heritage precinct beyond. The proposal to demolish these important heritage structures (in LOTG1 and G2) and turn the entrance into a walled canyon (10-12 stories) will destroy spatial link between Fleet Street and the heritage precinct beyond.

* This lot in it's entirety should be left undeveloped and integrated into Open Space #4 to the south.

* No Parking should be allocated on this lot.

* No new development should occur on this lot.

* No part of this lot should pass from public ownership.

* Bridgeway House should remain in State Government ownership and ultimate control and be made available for adaptive reuse through short and/or long term leasing arrangements.

LOT H1 - 6561sqm (6 + 8 Storeys)

* The setback on the western boundary of the site is too small and will spatially narrow Fleet Street, destroy the existing streetscape and almost certainly require the immediate or eventual removal of the listed stone wall that flanks the street on both sides. The prevailing Setback on Fleet Street should be maintained.

LOT H2 - 8732sqm (8 Storeys)

LOT H3 - 43279sqm (8 + 30 Storeys)

LOT H4 - 24977sqm (6 + 20 Storeys)

LOT H5 - 29894sqm?? (3 + 6 + 6 + 6 + 8 + 18 + 20 Storeys)

* The setback on the western boundary of the site is too small and will spatially narrow Fleet Street, destroy the existing streetscape and almost certainly require the immediate or eventual removal of the listed stone wall that flanks the street on both sides. The prevailing Setback on Fleet Street should be maintained.

* Interpretive element for Quarry Wall and former gardens should be integrated into new development

* Provision should be made to ensure public access to the old quarry wall.

* Land occupied by H3 was previously zones for education and served as a public school. If this land is to be rezoned, then this loss of educational use land should be offset elsewhere in the development area. This is especially important considering the fact that the proposed redevelopment of this site will more than double the number of school aged children in the suburb.

LOT SA - 15783sqm (6 + 6 + 8 + 8 Storeys)

* 8-storeys or 28m is too high and will be more imposing on the site than the Stadium or the Leagues Club. 6-storeys or 22m is a more appropriate height limit for this site and still affords ample room for an enormous increase in available parking and commercial leasing opportunities.

* Any development to occur on this lot should be primarily focused on delivering an increase in capacity of parking for patrons of Parramatta Stadium, Parramatta Park, Parramatta Pools and the future needs of the heritage precinct to the north.

* Development here should only occur if an offset of RE1 Public Recreation zoned open space can be found elsewhere in the development plan to offset this loss of RE1 zoned land in this lot- so not to reduce the size of public open space in Parramatta Park. NOTE - an offset of RE2 Private Recreation zoned land, as proposed on page #43 of the PNUR Planning Framework Application summary document, is NOT acceptable. RE2 Private Recreation is not a fair substitute for RE1 Public Recreation zoned land, especially when it is planned as the future location of a large building

* This lot is totally unsuitable for residential development

* This lot should remain in State Government ownership and ultimate control, under the custodianship of the Parramatta Park Trust and be made available for adaptive reuse through short and/or long term leasing arrangements. All income from any future use of this lot should be quarantined for the sole use of maintaining and improving Parramatta Park (consistent with the revenue objectives outlined in the, now repealed, Cumberland Oval act).

* The rezoning of this lot from RE1 Public Recreation runs counter to the Parramatta Park Trusts core objective, which are to (a) maintain and improve the Trust lands, (b) encourage the use and enjoyment of the Trust lands by the public by promoting the recreational, historical, scientific, educational and cultural heritage value of the lands and (c) ensure the conservation of the natural and cultural heritage values of the Trust lands and the protection of the environment within those lands.

LOT SB - 9217sqm (6 + 8 Storeys)

* 8-storeys or 28m is too high and will be more imposing on the site than the Stadium or the Leagues Club. 4-storeys or 16m is a more appropriate height limit for this site and still affords ample room for an enormous increase in available parking and commercial leasing opportunities.

* Development to occur on this lot should be primarily focused on delivering an increase in capacity of parking for patrons of Parramatta Stadium, Parramatta Park, Parramatta Pools and the future needs of the heritage precinct to the north.

* Setback from O'Connell Street is too small (this is also the case with LOT SC & SD). A setback of at least 8m should be maintained between any new construction and O'Connell Street frontage. This is important not only to allow for the safe flow of people in and out of the stadium during game time, but also allow for future improvement and/or widening of the Parramatta's primary north-south arterial road to accommodate existing and future avenue of trees, need for extra turning lanes, dedicated bus lanes and other future requirements.

* Development here should only occur if an offset of RE1 Public Recreation zoned open space can be found elsewhere in the development plan to offset this loss of RE1 zoned land in this lot- so not to reduce the size of public open space in Parramatta Park. NOTE - an offset of RE2 Private Recreation zoned land, as proposed on page #43 of the PNUR Planning Framework Application summary document, is NOT an acceptable offset.

* This lot is totally unsuitable for residential development

* This lot should remain in State Government ownership and ultimate control, under the custodianship of the Parramatta Park Trust and be made available for adaptive reuse through short and/or long term leasing arrangements. All income from any future use of this lot should be quarantined for the sole use of maintaining and improving Parramatta Park (consistent with the revenue objectives outlined in the, now repealed, Cumberland Oval act).

* The rezoning of this lot from RE1 Public Recreation runs counter to the Parramatta Park Trusts core objective, which are to (a) maintain and improve the Trust lands, (b) encourage the use and enjoyment of the Trust lands by the public by promoting the recreational, historical, scientific, educational and cultural heritage value of the lands and (c) ensure the conservation of the natural and cultural heritage values of the Trust lands and the protection of the environment within those lands.

LOT SC - 8589sqm (6 + 6 Storeys)

LOT SD - 6938sqm (4 + 4 Storeys)

* The rezoning of this lot from RE1 Public Recreation runs counter to the Parramatta Park Trusts core objective, which are to (a) maintain and improve the Trust lands, (b) encourage the use and enjoyment of the Trust lands by the public by promoting the recreational, historical, scientific, educational and cultural heritage value of the lands and (c) ensure the conservation of the natural and cultural heritage values of the Trust lands and the protection of the environment within those lands.

* No development should occur on this site at all, other than to improve or upgrade the existing amenity of a public pool.

* This lot is totally unsuitable for residential development.

* This lot should remain in State Government ownership and ultimate control, under the custodianship of the Parramatta Park Trust and be made available to PCC for the continued operation of a public pool through a long term leasing arrangement. All income from any future use of this lot should be quarantined for the sole use of maintaining and improving Parramatta Park (consistent with the revenue objectives outlined in the, now repealed, Cumberland Oval act).

Thank you for your time spent reading this submission.

Sincerely,

Jason Burcher

P.S. - I very much would have liked more time to digest and respond to this Planning Framework Application. Four weeks is certainly not enough time to absorb, understand and respond to >2,400-pages of detailed information.



This email is free from viruses and malware because [avast! Antivirus](#) protection is active.

Anna Johnston

From: Paul Byleveld <pbyleveld@bigpond.com>
Sent: Thursday, 11 December 2014 8:16 PM
To: Anna Johnston
Subject: Parramatta North proposal - submission

Hi Anna

Thank you for your time when I called a few weeks ago. As discussed, I am currently overseas supporting the Red Cross Ebola virus response. I am sorry I have not had the opportunity to review the proposal in detail. I do not know to what extent the proposal addresses the following:

Active transport has benefits for individuals and the environment. I recommend that adequate provision and careful consideration be made for bicycle parking, especially at transport locations/hubs and retail outlets, and for safe travel by bicycle within and outside the precinct. I also recommend that provision be made for safe pedestrian movement throughout the precinct.

Kind regards Paul

Community Action Alliance for NSW

Reclaim NSW from developers and big business. A volunteer community organization dedicated to the protection of the environment, conservation of heritage and good planning – actions not words.

PO Box 6116 North Ryde NSW 2113

Email:- communityactionalliance@inet.net.au

19 December 2014

Ms Carolyn McNally
Secretary
Department of Planning & Environment
GPO Box 39
SYDNEY NSW 2001

Re: Parramatta North Proposed State Significant Site.

This is a submission by the Community Action Alliance NSW in respect of the above proposal. The Alliance was formed in November 2014 to assist and support local communities in their campaigns on environmental planning and heritage issues, and advocacy for a robust planning system for NSW.

Urban Growth NSW is a government agency. It was created by the NSW Government “to deliver wholesale projects and major urban transformation. This redirection focuses on transforming underutilised and derelict government land in city-shaping locations by creating a united vision, coordinating key stakeholders, master planning, de-risking and working with the private sector to create world-class redevelopments”. Also, “some projects (are) providing the public with the opportunity to access government land previously locked off to them for generations”.



The project area includes the following Precincts:

Cumberland Precinct
Sports and Leisure Precinct
Parramatta Park Precinct
Old Kings School Precinct.

Urban Growth has decided that changes are required to allow future mixed use development comprising residential, retail, commercial, recreation and community uses, as well as adaptive reuse of a number of heritage items.

Urban Growth NSW proposes changes to the Parramatta Local Environmental Plan 2011 and Parramatta City Centre Local Environmental Plan 2007. These changes are intended to establish new land use zones, building heights and floor space ratios for 32 hectares of land within the 'Cumberland' and 'Sports and Leisure' sub-precincts of the 'Parramatta North Urban Renewal Area'. Changes have also been proposed to planning and design controls in the Parramatta Development Control Plan 2011.

The draft Plan is not well conceived and will damage the most significant and intact historic precinct in Australia with physical evidence dating back to the colonial era and the governorship of Captain Arthur Phillip.

The proposal should be rejected because it:

- places excessive development pressures on the landscape and the heritage significance of the entire Precinct,
- the Precinct has greater economic, social and environmental potential as a heritage conservation area focussed upon creative reuse of existing buildings and structures, and sensitively designed low scale infill development which is compatible with the historic buildings, in terms of architectural style, materials, height and bulk,
- ignores the once in a lifetime opportunity to provide a riparian conservation zone along the Parramatta River that will provide natural bushland areas, (after weeding and bush regeneration) and open space for the people of Parramatta, and;
- When a better long-term plan than the current proposal is committed by a NSW Government it can be expected that the Parramatta River foreshores will become an attractor for people all over the Sydney region to come and enjoy.
- It is time that the Parramatta River foreshores were recognized for the real public asset that they are; economically, socially, and ecologically.
- The land is public land that should not be alienated through sale or leasing.
- The NSW Health Department and it's Properties Unit should no longer have responsibility for managing the public land with the Health portfolio.
- Land and buildings that are no longer required for Health purposes should be transferred to another government body, such as a Trust that is responsible for maintaining the buildings and conserving the heritage values, until new uses can be determined.
- The Health Properties portfolio includes buildings designed by every NSW Government architect and appropriate uses can be found, as demonstrated by the adaptive re-use and conservation of the land and buildings that now forms the Rydalmere campus of the University of Western Sydney.
- All levels of government are required to contribute to this process.
- NSW Health Properties Branch must be relieved of the responsibility to sell public land and assets to support the Health budget. This is an anachronism that should no longer apply in NSW.

- There is scope for an integrated public precinct along the Parramatta River in Parramatta LGA and beyond. It must include UWS Rydalmere and the former Cumberland Hospital.
- The Sydney Growth Plan proposes a Green Grid of linked bushland corridors and open space. The North Parramatta Precinct is a unique opportunity to progress this concept, which can then be extended from Vineyard Reserve to Mobbs Hill and Eastwood, focussing on creeklines and the Parramatta River foreshores.
- It is completely inappropriate to declare the project one of State Significance and remove the NSW Heritage Council from engagement in the decision-making process. This is a circumstance in which the Heritage Council can provide specialist advice to the NSW Government without dependence on external consultants.
- No justification is provided for the scale of development proposed.
- It appears that the target of 4000 dwelling units has been plucked out of thin air.
- The scale and quantity of development proposed is contrary to the principles and guidelines provided in the Conservation Management Plans prepared for the NSW Heritage Council, having regard to the State Heritage Register Listings applying to the land.
- It is noted the excessive scale of development indicated in the concept drawings can be assumed to become more intensive given the provisions for variations development consents under the NSW Government's approach to planning law.
- The construction of new multi-storey buildings in the Female Factory precinct is inappropriate and a more sensitive response is justified.
- The construction of 16 storey buildings directly adjoining the Recreation Hall, Chapel and Parramatta Gaol is not acceptable.
- The construction of 4, 6 and 8 storey mixed use developments in Parramatta Park along O'Connell Street is not acceptable.
- The demolition of the highly significant residence of the Chief Attendant, 9 Fleet Street is unacceptable.
- All buildings with a "high significance" heritage value be retained.
- A detailed traffic and parking analysis is a pre-requisite for any rezoning of the land for mixed uses.
- It is of great concern that the photomontages presented in the proposal appear to be very misleading and understate the impact on viewlines and values of the World Heritage Listed Old Government House and Domain.
- The proposal does not adequately address Aboriginal heritage, cultural and landscape perspectives and further engagement of the Aboriginal community in decision making regarding this project be considered a high priority.

The Community Action Alliance appreciates the opportunity to input on this proposal and would be willing to participate in a charrette or other community inclusive process to produce a positive outcome for the Precinct.



Jennie Minifie
on behalf of Community Action Alliance NSW.

Thank you for opportunity to prepare this submission in response to the policies drafted for public comment for the Parramatta North Urban Renewal (PNUR) project.

Conceptually the idea of transforming Parramatta North from an area dislocated from most of our community, despite its' significant historical legacy, into an activated and connected mixed use community is supported.

However, there are a number of areas in the policy framework that fail to address, or do not adequately consider, the long success of the PNUR project.

Design Excellence

A defining feature of the project is the desire to recognise, maintain and use the historical legacy of this area. As indicated in several draft polices, the area houses a number of local, state, national and world significant European and Aboriginal sites.

Beyond any works to these sites, any new building in and around these sites must have a suitable architectural response in order to, not only to provide a quality new environment, but also to recognise and celebrate the heritage of Parramatta North and indeed Parramatta more broadly.

The proposed Clause 4.3.5.3 in the draft Development Control Plan (DCP) to restrict Design Excellence criteria to proposals of ten storeys or more is not supported.

The Indicative Layout Plan (ILP) in Clause 4.3.5.4 in the Draft DCP shows many building envelopes as exceeding ten storeys (and therefore Design Excellence controls apply) but the ILP also shows than many proposed developments, including those that immediately adjoin existing buildings of significant historical integrity, are less and therefore are exempt from Design Excellence review.

In order to achieve a community in Parramatta North that has design integrity, the criteria for review by any Design Excellence panel must be reduced to buildings of five storeys or more.

Further the DCP's reliance in clause 4.3.5.3 on the use of pre-lodgement advice cannot be relied upon to ensure good outcomes.

In order to ensure the integrity of the DCP that before it is adopted that it is "tested" by a developer likely to use it in order the developer can successfully use the DCP to achieve a desirable outcome without needing to vary the DCP controls or disregard its intention or goals. Clause 4.3.5.5 in the DCP provides a procedure to follow if/when a variation to the ILP (or other control) is proposed. Beyond the fact that DCP's are by their nature able to be varied (especially in light of Section 79C(3A) of the EPAA) the inclusion of this clause in the DCP is a reflection that the ILP and other controls relating to the PNUR lack integrity, have not been tested and are prone to failure.

Car Parking

Perhaps the single most important piece of infrastructure required for the successful completion of this project will be the need for private vehicles to easily access the site and the surrounding road network without causing unreasonable traffic burdens onto the rest of the community.

The suggestion in the policy framework and in Section 6.1 of the GTA Traffic Report of falling private vehicle use, and therefore declining demand for off street parking, borders on the fantastic

The proposal to carry out a series of road upgrades in and around the site (to connect with the existing road network), the expansion of “The Loop” bus service (see Fig 4.6 in GTA Traffic Report) and the use of existing off street parking rates in the DCP represents a reasonable, though unimaginative, outcome.

While it is desirable to see fewer cars on the streets, the suggestion that dwellings in the PNUR project will forgo private car use due to their proximity to the Parramatta CBD and Westmead Health Precinct is unrealistic.

A reduction in car use has been successful in places where the need for cars has been reduced by ensuring both walkable communities and by provision of long term and functional public transport. Examples of this include Portland USA where a very successful light rail system has been installed. More locally, Burwood has reduced its DCP requirements for off street parking due, in part, to its existing public transport infrastructure and ability for residents to easily catch a bus or train to work but also to do their shopping, recreation and other needs (eg: visit the doctor) on foot. The expansion to “The Loop” bus service (which is a publically funded project that could be jettisoned by a government budget at any point in time), while supported, does not fulfil this need of the PNUR project.

A preferred solution may be for the Urban Growth and Dept of Planning (DoPE) to work collaboratively with Roads and Maritime Service and Dept of Transport to integrate the potential Light Rail system touted for Parramatta with this PNUR project. The use of light rail is more likely, than reliance on buses, to see a reduced demand for car use.

The suggestion that the PNUR should occur in concert with any Light Rail was made to a DoPE officer at the “Drop In Session” on 29 November 2014 who responded that light rail is a ‘transport issue and not part of this process’. This is a poor cultural indicator as to the seriousness that DoPE puts on the long term success of the PNUR.

The provision of a light rail system that integrates with both existing communities and the proposed PNUR community would, in addition to reduced demand for car use,

also justify a reduced off street parking requirement in the DCP. For example, the provision of light rail may justify a flat rate of one parking space per unit regardless of dwelling size. The use of car sharing (such as “Go Get”) is also supported.

Sustainability and Infrastructure

Disappointingly, the draft policies surrounding the PNUR project do little to support and encourage sustainable design, beyond the provision of SEPP (BASIX) 2004.

While design excellence may provide sustainability measures as part of any individual architectural design response, the lack of sustainability goals and outcomes incorporated into the PNUR project policy framework is a poor reflection on how DoPE views sustainability.

Beyond general service infrastructure such as electricity, gas and telecommunications needing to be installed, the site is located within flood prone land. While flooding from the adjoining Parramatta River can be controlled, the overland flow paths cannot be so easily managed. The apparent reliance on future developments within the PNUR project to cater for overland flow when designing their own stormwater management systems is shortsighted and places a significant burden on individual developers, the cost of which will be passed onto the tenants which does nothing to provide for anything approaching “affordable housing”.

The provision of this type of infrastructure (as with the provision of public transport) must be addressed by a coordinated “whole of government” approach at this “masterplan” stage and not be postponed for individual developers to cater for in the future.

Further, the position in Section 4.2 of the Infrastructure and Rezoning Report from Hyder Consulting that further overland flow investigations are required reflect the “less than comprehensively thought through” approach given the PNUR project by DoPE.

Heritage

In addition to the any archeological work required by development within the PNUR project, there are two impacts on the historical value of Parramatta North as a result of this project.

The first relates to how heritage listed properties will be used as part of this project. While there has been some sensitivity used to retaining existing buildings of historical value as part of the ILP, the use of these buildings (after their restoration) has not been adequately considered. While there will no doubt be some demand for sensitive conversion of heritage listed properties into either “premium” residential uses or small scale commercial uses (such as local cafes, shops or small offices), the quantity of heritage buildings to be restored and retained, as well as the expense

of their restoration, does reduce the ease of converting and interpreting reused heritage items. In short, is the economic demand to move into a restored heritage property?

The second issue is how these heritage listed properties will sit within their new environment. Beyond any suitable architectural design response between existing buildings to be restored and proposed new developments, the area (particularly the Cumberland Precinct) is now typified by small scale development within a large open space. Obviously this will change, but it must be change for the better. The curtilage of heritage listed properties and how they will relate with new development is vital to ensure the success of the PNUR project. For this reason the draft DCP for Parramatta North must require that any proposal that includes or adjoins a heritage listed property must address how the proposal meets the controls of the DCP as well as how the proposal will positively engage with the environment surrounding the item itself without compromising the historical value of the site.

The literature provided for the PNUR project surrounding the preservations of historic sites and potential archeological sites strongly articulates the need for preservation. However, it is imperative that DoPE explain to both the development community and the wider community that the project is not compromised by the value of the heritage listed properties found there. In short, that the new development will 'harmonise' with the existing built form to be restored.

It must be promoted and recognised that this project will change the current heritage listed environments but also the development of Parramatta North must sensitively cater for existing heritage. While this concept must be reflected in the policy framework for Parramatta North, in reality the requirement for individual developments must provide for the treatment of heritage sites at a "micro" (or "on the ground") level.

Ultimately, any compromise to existing heritage (and there inevitably will be some) must be compensated for by design excellence which results in the new building being deemed as "heritage items of the future".

Amenity

I note that the current affordable housing provisions in Parramatta DCP will not apply to PNUR. Given the cost in developing this area, the added cost of providing affordable housing is unreasonable, though the lack of affordable housing is undesirable.

The reliance on BASIX in providing a "sustainable" environment for residents is also a poor result. The renewal of Parramatta North represents an opportunity to provide a framework that encourages (and requires) not only design excellence in terms of new architecture and heritage restoration but also in excellence in environmental

design. While individual developments may incorporate environmental innovation as part of their design response, the lack of guidance or support for innovative use of sustainable design for buildings and facilities within the PNUR is an opportunity lost.

As with sustainability, the amenity (for future residents) being reliant on the existing controls, such as those in SEPP 65 and internal room dimensions in Parramatta DCP, represents minimum standards to be met. Instead the PNUR policy framework should provide for “worlds best practise” that exceed the minimum standards found in the Residential Flat Design Code and the DCP and which results in a new community that comprises not only beautiful and sustainable buildings but also which provide a high level of internal amenity such as large room dimensions, high ceilings and generous courtyards & balconies.

It is refreshing that the PNUR policy framework includes the needs for a significant portion of 3 and 3+ bedroom units. While the current market may demand mostly two bedroom units, if Parramatta North is to be a “community for the future” it must accommodate more than just what the current market demands. Parramatta North must be able to be easily accessed for a variety of residents (including those with a disability) but also large families. With the growing cost of “bricks and mortar” housing, the demand for high-quality high-density living will increase over time. The PNUR is an opportunity to cater for that market and ensure the long term success of Parramatta North.

Conclusion

The PNUR is an opportunity to create an environment that promotes significant examples of Australia’s historic past together with contemporary high density urban living, working and playing.

Further, that this environment is well connected to the Parramatta CBD but is clearly recognisable as “suburb” of it, ie: Parramatta North, as opposed to it “just being” the northern arm of the Parramatta CBD.

Such an environment promotes best practise in building sustainability, the restoration and appropriate reuse of outstanding historic properties, long term social values and housing choice for a variety of occupants and house contemporary buildings that encapsulate design excellence.

The PNUR, as presented in this forum, does not adequately promote these qualities.

The lack of integration between the PNUR and other infrastructure providers, such as Light Rail, flooding mitigation, schools and hospitals, as well as the reliance on the status quo instead of striving for innovation and “world’s best practise” for the new built form is disappointing and represents an “opportunity lost”.

Beyond the lack of imagination in attempting to create a new and vibrant community in Parramatta North, the lack of vision in the policy framework presented for comment suggests the PNUR will be left largely to market forces for its long term success as a desirable place to live and work, instead of being backed for strong policy that requires the need for both a variety of housing and employment land choices.

The PNUR as presented is an adequate but boring project.

It is imperative that DoPE re-examine both the opportunity to create a great environment, not just an adequate one. Further, that the recommendations made in this submission and in the expert reports be done before further action is taken, lest the outcome be flawed and PNUR be set up to fail.



Ms Emma Hitchens
Team Leader
Urban Renewal
Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

Dear Ms Hitchens

I understand the NSW Department of Planning and Environment (DPE) is undertaking public consultation in relation to the proposed rezoning of the Parramatta North Urban Renewal (PNUR) area. As you may be aware, over the last few years the Australian Government Department of the Environment (DoE) has been working with DPE and Parramatta City Council in relation to the protection of one of Parramatta's significant heritage places: the World and National Heritage listed Old Government House and Domain.

All three levels of government are currently developing a Conservation Agreement under the *Environment Protection and Biodiversity Conservation Act 1999* for the protection and conservation of the World and National Heritage values of Old Government House and Domain. The draft Conservation Agreement reflects the controls in the *Parramatta Development Control Plan 2011* (DCP) which was amended by Parramatta City Council earlier this year to create the 'Park Edge Special Area'.

DoE has looked at the *Draft Amendment to Parramatta Development Control Plan 2011* that was recently on exhibition as it proposes changes to these controls, in particular to Area A.1 – Parramatta Leagues Club Site, and Area A.2 – Parramatta Stadium Site, Parramatta Pool and Car Park. These areas are located within the 'Sport and Leisure Precinct' identified in the PNUR for rezoning and approximately 34,000m gross floor area of mixed-use (predominantly commercial) development.

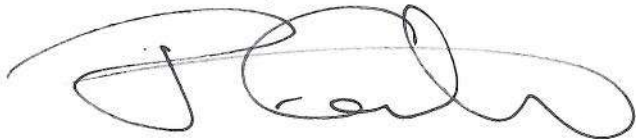
The proposed rezoning will introduce new buildings with a potential for visual impact in an area that is currently relatively undeveloped due to its zoning for recreation. In addition, the development controls for Lots SA, SB, SC and SD in the PNUR 'Sport and Leisure Precinct' provide for development of four to eight storeys (or up to 28 metres according to the *Draft State Environmental Planning Policy PNUR 2014 Planning Report*).

It is unclear how these figures relate to the current DCP/ draft Conservation Agreement controls which refer to the need for 80% of the building height to be contained below the level of the established tree canopy of Parramatta Park when viewed from six specified viewing locations. DoE understands a *Cultural Landscape Heritage Assessment* has been prepared that found the visual impacts of the development would be minor and acceptable.

This Assessment does not however compare the proposed controls for the 'Sport and Leisure Precinct' with the controls recently developed for Areas A.1 and A.2 in the current DCP. We would therefore appreciate being provided with more detail on how the revised height controls for Lots SA, SB, SC and SD have been developed and their relationship with the previous controls.

Please contact Ms Leanne Burrows, Assistant Director, National Historic Heritage Section, on (02) 6275 9123 if you would like to discuss further.

Yours sincerely

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

Jennifer Carter
Director
Historic Heritage Section

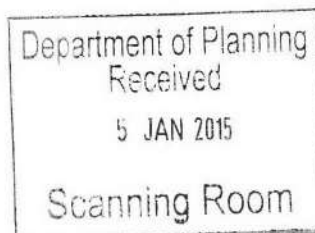
5 January 2015



Education &
Communities



Mr Michael File
Director Urban Renewal
Department of Planning & Environment
GPO Box 39
SYDNEY NSW 2001



DOC 14/623832

Dear Michael,

**Re: Exhibition of Parramatta North State Significant Site –
Proposed Changes to Parramatta LEP's**

I write in response to your request dated 19 November 2014 inviting the Department of Education and Communities (the Department) to comment on the above proposal.

The proposed project is within the North Parramatta Public School, Parramatta Public School, Northmead Creative and Performing Arts High School and Macarthur Girls High School catchments. All schools in the surrounding area are currently utilising all permanent classrooms and this is anticipated to continue into the foreseeable future.

The North Parramatta urban renewal proposes 4,100 additional dwellings staged over a 15-20 year period. The Department is also aware of other developments occurring in the vicinity of this project and will monitor production and take up rates across this and other developments. The cumulative impact of these developments will significantly increase education demand in the future, requiring significant investment in new education infrastructure.

The scale of this development may instigate the provision of a new primary school within or adjacent to the Parramatta North development precinct and the Department will continue planning with Urban Growth and other Government agencies.

This urban renewal project raises a number of matters relating to school education needs and opportunities which the Department is interested in examining further with Urban Growth NSW and the Department of Planning and Environment as outlined below.

Land Use Planning

When considering significant land use changes such as those proposed for Parramatta, the Department encourages planning authorities to account for education infrastructure and allow for the lead time required to plan and build new education infrastructure.

The challenge for the Department is to plan for the expected increase in student population arising from major urban renewal projects, in a balanced and affordable way. The Department encourages the broader State planning system to be supportive of land use development policies that help address these pressures. The Department is therefore supportive of a shift in planning policies which will encourage:



- Optimizing the size, amenity and function of existing schools so that they afford greater choice and provide contemporary teaching spaces for students
- Facilitating out of hours shared use of educational facilities such as ovals and halls
- The removal of planning policy barriers to school development
- The construction costs of additional teaching spaces to be funded from developer contributions
- Land dedications and appropriate rezoning in areas where new schools are required
- Streamlined planning approvals for new education infrastructure

Education Needs Associated with Additional New Housing Development

The development of 4,100 additional dwellings in North Parramatta is expected to generate further increases in student populations and demand for additional teaching spaces for Government schools in the locality.

Government primary and secondary schools around Parramatta are subject to projected increases in student populations over the short and long term future to at least 2026, and have limited capacity within existing school assets to meet projected demand beyond the short term.

The Department is currently developing a number of planning strategies to meet projected demand from student population growth in primary and high schools in the Parramatta and Holroyd LGA's to at least 2026. The first of these planning strategies will address schools in close proximity to the north of the Parramatta CBD including the North Parramatta urban release area.

Education Opportunities Presented by Urban Renewal

The Department is keen to further examine opportunities presented by the North Parramatta Urban Renewal project for strengthening the provision of primary and secondary school education in the Parramatta area. In particular, we are interested in the opportunities for new or expanded school property assets including:

- Opportunities on Government land in the area as options for new or expanded secondary school/s in the Parramatta area
- Opportunities for Government to capture the uplift in property values brought about by changes to planning rules in order to assist the funding of additional educational infrastructure

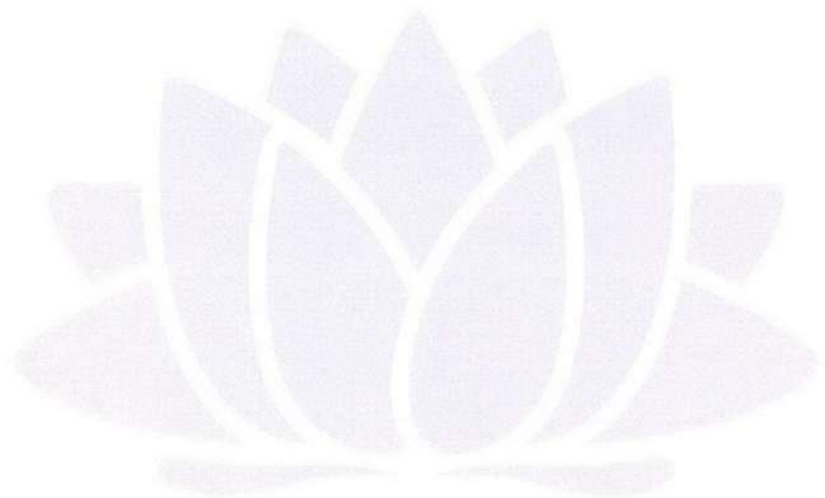
I trust the above information is of assistance. We look forward to working with you further on education needs and opportunities associated with the North Parramatta Urban Renewal project. Please contact Lesley Moodie, Senior Asset Planner on 9561 8255 or email lesley.moodie2@det.nsw.edu.au for further information.



**Education &
Communities**

Yours sincerely

John Neish
Director, Planning and Demography
16 December 2014



Planning NSW

18 December 2014

Dear Sir,

I am writing in relation to the development proposal in North Parramatta and would like to indicate my concern with the enormity of the project in general, and with recent changes to zoning (affecting building heights) in this area.

As far as I was aware, and the last information I received was that there was approval for affordable housing (3 stories) in July 2014. I fail to understand how such a major proposal for 20 and 30 story apartment blocks may have gotten to this stage without proper consultation with residents in the area!

Unfortunately I am unable to open your documents on-line and therefore make my comments in a general manner, without foresight into the comprehensive plans for this precinct.

In general, (and without much time for contemplation) I believe that building heights of 20 – 30 stories, and the subsequent influx of people will create endless traffic problems in an area that does not have appropriate infrastructure. Fennell, Harold, Albert and parts of O'Connell streets are narrow streets and if this development proposal is approved traffic flow and parking within these areas will be severely affected. Also, consideration should be made with regard to parking during events at Parramatta Stadium.

I am also concerned as to the impact that such a high rise will cause by over shadowing the surrounding neighbourhood. I live 2 blocks from this site and a 20 story building will see new neighbours looking directly into my bedroom window - not a very nice thought!

I believe the water quality in Parramatta River is already of concern and I am worried that the run-off during development and subsequent stress on the river system with the addition of 4,100 new residents would cause further pollution to an already stressed waterway. We have a flourishing bird life and other fauna within Parramatta Park and if river pollution increases we may very easily jeopardise native animals and plants. Consideration should also be made for local bat colonies and nesting water birds along the eastern riverbank. In particular and due to already declining numbers, the Grey Headed Flying Fox has been protected in NSW since 1986. When present in urban environments, the bats have been perceived as a nuisance because their roosting and foraging habits bring the species into conflict with humans. They often suffer from direct killing by humans and harassment and destruction of their roosts. If this proposal were to go ahead I feel that the protected Grey Headed Flying Fox colony will be endangered.

We have a wonderful park in Parramatta and very fragile historic sites within the proposed development areas and I believe that these spaces may be ruined if a major development such as this goes ahead.

I have only found out about the proposed developments in the last week, and feel that we have not been given enough time to consider the current proposal and its impacts on our environment.

Please allow the residents more time to consider this proposal and please reconsider the magnitude of this development in an area that is overpopulated and already has inappropriate infrastructure.

Thank you and regards

Emma Hitchens

From: Dr Alan Fahey <info@mindperformance.com>
Sent: Friday, 19 December 2014 5:00 PM
To: information-Planning
Subject: Cumberland Hospital and Parramatta Prison 19/12/14 Urban Renewal Proposal
Parramatta North

To: The UrbanGrowth NSW Project Team and
The Department of Planning and Environment and
The Parramatta City Council
Subject: Cumberland Hospital and Parramatta Prison 19/12/14

Dear Managers

This email is being sent to this address as we have been unable to locate the section at formal submissions for Parramatta north urban renewal on the website.

This submission is made on behalf of a group consisting of members of the staff of Cumberland Hospital, members of the public including residents in the vicinity of Cumberland Hospital and North Parramatta and business owners in the North Parramatta vicinity.

The grounds of the Cumberland hospital and the area for consideration of development proposed under the Parramatta north urban renewal project represent a unique region of both the metropolitan area of Sydney and the nation of Australia. The existing Cumberland campus and associated heritage buildings have special historical value.

They represent an existing time capsule demonstrating buildings from so many different eras of building throughout Australia's history from the late 1700s through to recent times.

The grounds and buildings belong to the state government but are an important part of Australia's historical beginnings and history and should be protected for the entire nation without major changes to the grounds or existing buildings.

At this stage there has been no truly public consultation process with the public as a whole.

I conduct a medical practice which is a business and also live in the area and did not receive any directed written notification sent to me regarding the sale or development of this area.

I attended a 'public meeting' advertised in The Sun, a local paper which was to be held at the Parramatta Town Hall on Saturday 29 November between 3pm and 5 pm, only to find out that no such meeting was being held and a poster presentation was in place, supported by representatives of the state government.

Other members of the public also attended expecting to be involved in a public debate about the merits or otherwise of this proposed development. We were all equally disappointed to find out that no public meeting was being conducted.

I have attended the grounds of Cumberland Psychiatric Hospital, previously known as Parramatta Psychiatric Hospital to attend the Wisteria Fete annually since childhood. I was previously the Town Crier for Parramatta for a period of five years, and as such have had a strong connection with the cultural heritage aspects in Parramatta and its significance to the wider community for most of my life.

The simulated images of what is being proposed for the Parramatta north zone shows multi storey buildings in close proximity to sandstone historic buildings. We believe that it is inappropriate to destroy the preserved historical aspects of the zone by incorporating multi storey residential or commercial premises into this zone.

We have strong heritage values still intact with many other artefactual features from the period of 200 years ago, including buildings with special markings from the convict era etched in stone and timber, and many historical relics still preserved by volunteers and staff members of the Cumberland Hospital such as those in the museum.

I saved a building at the hospital when I noticed that it had smoke billowing from the inside through an open doorway. I ran into the building whilst holding my breath and then exited shutting thus reducing the air and oxygen flow to the fire. Security and the Fire Brigade were then called and the building was saved.

Many people in the community have a strong emotional attachment to the hospital which has been a part of the community for over 200 years. My great uncle was a plumber at the hospital for decades in the early to mid part of last century.

The Tower of London in England has been preserved and is one of the world's most popular tourist destinations.

Many historical relics of been preserved and the establishment employs ex military and police personnel to conduct the tours of the castle-like establishment.

I have had a personal guided tour by the governor of Parramatta prison in 1992. The historical relics and artefacts in that establishment are precious and should be preserved. The cells were basically unaltered since their construction 1842.

I recently joined two tours at Fremantle Prison south of Perth in western Australia. The tours were conducted by ex military personnel and were extremely informative and educational. They also gave great insight into an aspect of Australia's past.

The New South Wales government could establish a similar facility in the demographic centre of Sydney at Parramatta in the Parramatta north zone in question.

If the buildings and walls of the Parramatta Gaol are returned to the public after the determination of the present aboriginal land claim then I believe it should become part of the Cumberland psychiatric Hospital and prison region and the whole region should be protected against residential development and established as a tourist destination with strict conditions.the building should be utilised by the government in a form which is meant minimally damaging to the heritage value that is contained there.

In summary, we propose:

1. That residential and commercial activity not be introduced into the Parramatta north urban zone
2. That the government continues to occupy the buildings as office sites with any necessary renovations which do not damage the historical value of the buildings
3. That the potential of the zone as a location for controlled tourist activities similar to those found at the Tower of London be investigated and considered
4. That true public debate is held as an open forum in a public space such as the Town Hall at Parramatta or in an even larger venue if required
5. That a more widespread and intensive public notification campaign be conducted rather than the previously limited notification given to 'targeted stakeholders'.

Yours sincerely

Dr Alan Fahey

MPsychiatry

0427 408 134

Emma Hitchens

From: Dr Alan Fahey <info@mindperformance.com>
Sent: Monday, 5 January 2015 5:01 PM
To: information-Planning
Subject: Parramatta North Urban Renewal Development Proposal Submission by Dr Alan Fahey

This submission is made in relation to the Parramatta North Urban Renewal Development Proposal incorporating the Cumberland Precinct and the Sports and Leisure Precinct which includes areas formerly known as Cumberland Psychiatric Hospital and Parramatta Gaol, the Female Factory and the Parramatta Girls Home.

This submission is made on behalf of a group of health professionals, hospital staff, historical society members and the general public.

Overview:

The grounds and buildings of the Cumberland Precinct and the Sports and Leisure precinct are owned and or overseen by the state government but belong to all Australians and should be protected for present and future generations. The precincts are a precious and irreplaceable time capsule. The existing character of the precincts, both the grounds and the buildings need to be preserved and maintained and restored where and when necessary. They need to be protected from damage and their character highlighted whilst simultaneously optimising the better utilisation of the grounds and a greater number of the buildings. Many of the buildings have already been professionally restored in line with heritage guidelines and are currently in use by a variety of state government departments. The precincts in their entirety should be protected with heritage orders. An overseeing body should be appointed to maintain and extend the process of the appropriate restoration and utilisation of the entirety of the precincts. The managing body should be governed by a board which includes specialist historians and other representatives from historical societies, The National Trust and the Heritage Councils of NSW and of Australia.

Points overview:

1. Historical and heritage value of the buildings within the precincts.
2. Historical and heritage value of the grounds within the precincts.
3. Therapeutic benefits of the Cumberland precinct for past and present occupants including patients ('consumers').
4. Public sentiment and emotional attachment to the precinct.
5. True public consultation.
6. Utilisation of the precincts and a plan for the future.
7. Summary

Points details:

1. Historical and heritage value of the buildings within the precincts.

The precincts have special historical and heritage value for occupants of: the Parramatta area, New South Wales and Australia as a whole. The buildings within these precincts represent a precious array of the progression of building types and styles throughout New South Wales as it was formally called and then the nation of Australia's history.

- a. The grounds and buildings have been maintained by a series of people including convicts, prisoners, patients, military, police, warders, correctional service personnel and numerous other staff for more than 200 years.

The area contains examples of different and sequential architectural styles from the late 1700s through to the present era. The building works include the original stone weir wall built and used for controlling the flow of water for productive use constructed by the original colonists in the late 1700s, shortly after the inception of the then British colony in 1788. Our history is etched into the buildings, the stonework, the timberwork and the slate rooves contained within the precincts. A considerable number of works were completed before the formation of the states and the eventual creation of Australia as a federation in 1901. Parramatta gaol was completed in 1842. Much of the building work remains unaltered since that time. The gaol has a vast number of historical works which make it a valuable precious asset in its present form. The

buildings within the precincts including the gaol are of national significance. The precincts have many buildings which represent a precious and irreplaceable time capsule which should be preserved for present and future generations. Many of the buildings within the precinct have already been restored and refurbished in line with heritage preservation guidelines. Those restored buildings are occupied and utilised during normal business hours by employees from a number of government departments (reportedly eight) including the Area Health Service personnel and mental health related staff. The buildings within the precinct were generally 'built to last'. They were constructed in eras when the buildings were solid, well founded and the craftsmanship was conducted with precision. The plethora of different buildings can be regarded as 'works of art'.

The proposed development with the potential introduction of thousands of people living in units within the precincts is incongruous with the historical nature of the precincts. The incorporation of large numbers of people into unit dwellings does not represent the creation of a true community of people. It has been claimed by some members of the public that the proposed multi-storey buildings planned to be sited within the precincts have already been earmarked for sale to investors who are predominantly not Australian citizens. These precincts are Australian icons. The precincts are most appreciated by Australians who have an understanding of the pivotal role that these grounds and buildings have played in our national record. The creation of communities is a long term process. The precincts need to be under the direct control of people who have a deep understanding of the significance of the precinct's site for all Australians.

The proposed unit dwellings would potentially place hundreds or thousands of children and teenagers within a short distance of some of the most historical buildings and established matured tree landscaping sites in Australia. What temptation would there be for children and teenagers to entertain themselves within the historical buildings and historical works sites, particularly at nights and weekends? Where would children and teenagers prefer to play other than in historic buildings and historic works? The temptation for them to enter or attempt to enter or interfere with the historical works is obvious. The risk of damage to the historical works appears evident.

The historic sites within the precinct are also situated close to the Parramatta River. What danger would be presented to the children and teenagers by being located so close to this waterway? Do the development proponents plan to fence the entire riverbank?

Serious damage was effected upon many of the historic buildings within the precincts in recent years by thieves. The thieves forcibly destroyed and removed historical guttering and downpipes from many of our oldest buildings, purportedly in order to sell the material for scrap metal. The buildings affected included the Institute of Psychiatry which had spent considerable sums of money particularly in order to restore the interior of the buildings housing the Institute of Psychiatry. The buildings were occupied during the working days of the week by dozens of working staff. The damage and theft occurred 'after hours'. The precincts even in their present form need to have closed circuit televisions installed, as well as security alarms and security lights which should be remotely activated by sensors. The CCTV's need to be connected to the precinct's security officers. The Cumberland hospital security team are highly motivated and have in my experience continued to maintain a high level of security for Cumberland Hospital including the patients and staff and also when possible, the buildings and grounds. The priority of the security staff is to assist patients or staff in situations of distress. The protection of the buildings and grounds is secondary but important. The government and the community owe a debt of gratitude to the staff including the security officers who have maintained such an excellent record of caring for our historical heritage. Without their vigilance the damage would have been far more extensive. The Institute of Psychiatry has renovated the buildings which compose the Institute in recent years and has tastefully and meticulously restored the buildings for present-day use with considered preservation of their historical value. The management of the Institute are to be commended for their fine work in commissioning the restoration and maintenance of the buildings in a way which also allows the buildings to have a practical current usage. Such restoration has occurred in a number of other buildings within the Cumberland precinct. The restoration process should be extended to all buildings within the precinct.

The precincts should be properly secured and patrolled at all hours, particularly during 'after hours' periods. Better security is required for these our national assets. The number of staff employed within the security team needs to be increased and the CCTV system installed.

b. The pamphlet produced by the government's Urban Development team shows the simulated buildings and grounds of the precincts with multi-storey buildings (reportedly up to 30 stories in height) located in

relatively close proximity to the historic buildings of the precincts. Such a development proposal is incongruous with the preservation and maintenance of the historical and heritage value of the precincts. The introduction of thousands of units, both residential and commercial into the precincts would destroy the character of the precincts and place the heritage grounds and buildings at great risk. Residential and commercial projects should not be introduced into the precincts other than for the purposes for which the existing institutional buildings were designed.

2. The precinct presently contains examples of landscaping with 'open space' and parkland with grassed areas and well established trees laid out at a distance from each other, or in small groups or 'clumps' in keeping with the landscaping concepts of the early colonists and parkland landscaping officers who designed park lands prior to the last two or three decades. The landscaping design is also in keeping with the overall landscaped pattern established across the entirety of the Australian continent which was established and maintained by the Australian aborigines for tens of thousands of years, as explained by Professor Bill Gammage from the Australian National University in his 2012 multi-literary award-winning book, 'Australia the biggest estate on earth'. In this book, Gammage explains how the aborigines landscaped 7,100,000 km² of our continent, the largest land management practice in human history. The aborigines maintained trees cleared areas of grassland between five and 1000 acres in area.

a. Landscaped areas with open-space are becoming a rarity in Sydney as building encroachments occur upon the previously grassed and vegetated regions, leaving little open grassland, other than sporting ovals in Sydney. The excessive planting of trees at a close distance to each other causes a loss of open parkland and introduces greater risk of vegetation fires as contiguous canopies become interlocked. The trees themselves become stressed as they compete for nutrients and space. This overcrowding is evident a few hundred metres from the Cumberland precinct in Parramatta Park where the previous 'airstrip' used by William Hart in 1911 has recently become lined with dozens of eucalyptus or 'gum' trees planted in recent years. These lines of trees will produce a contiguous and interlocked canopy, eventually obliterate the airstrip and produce a major fire hazard. Members of the 'First Fleet' reported that the gumtrees in Sydney Cove had a circumference of 15 to 18 yards at their base. Many urban dwelling Australians do not appreciate the true size of a fully grown individual eucalyptus tree. It has been reported that the Australian aborigines only allowed the growth of 4 to 8 trees to the acre (4000 m²) in the Sydney region. The early painted pictures of what became Parramatta Park all show abundant open spaces with groups of trees. The simulated picture of the Cumberland precinct in the North Parramatta Urban Renewal Development pamphlet shows the proposed planting of multiple trees in close proximity to each other. The introduction of many new trees into the precincts would produce a major fire hazard for the precincts in future years. The historical trams in Parramatta Park were all destroyed by fire from arson. St Patrick's Cathedral in Parramatta, a short distance from the precincts and a beautiful example of early colonial architecture had its interior destroyed by fire also from arson. As I previously reported to the government, I helped to save one of the historical buildings in the Cumberland precinct from destruction by fire a few years ago.

The presently landscaped open grounds, gardens and trees contained within the precincts should be preserved, tended, pruned and maintained in their overall present layout. The variety of palms within the precinct grounds as well as the pines such as the Bunya pine and other trees within the precincts are themselves part of the heritage and historical value of the precincts and deserve conservation. Many of the trees within the precincts would be 200 years of age or older.

b. The tiered, grassed and mown riverbank within the Cumberland hospital grounds and constructive in the late 1800s is in stark contrast with the severely eroded riverbank within Parramatta Park which is immediately adjacent to the Cumberland hospital across the boundary fence. This contrast shows the importance of the early and continued work of tending and conserving the grounds. The Boundary fence has metal spears held closely together and its presence has helped to prevent vandals from entering and destroying the precious property within the hospital grounds.

The Cumberland Psychiatric Hospital formally known as Parramatta Psychiatric Hospital and before that The Parramatta Lunatic Asylum has functioned as a complete working unit on both sides of the river until relatively recently and the buildings are well distributed within the domain. The entire precinct's boundaries should be secured with a high fence and the gates also properly secured and guarded in order to restrict the access of people into the area especially at nights and weekends and the security of the region should be

upgraded and maintained, including guarding of the gates. The historical grounds should not be easily accessible to the general public after hours, as that is an invitation to a small but destructive percentage of the population to commit potential vandalism and crime. It is difficult for the security service which has relatively limited staff numbers to properly patrol the area when the public have open access to drive their vehicles into the precinct grounds seven days a week. At present hundreds of vehicles enter and park on the grassed areas within the Cumberland precinct when football games are being held at Parramatta Stadium. The cars are parked in close proximity to the historical buildings and represent a security risk. Extra security personnel need to be engaged when such activities are conducted. The buildings within the precincts need to be kept and restored in their present form and locations.

3. The original concept of the hospital as an asylum with the inclusion of vegetation with grassed areas and well spaced trees is in itself therapeutic for patients with psychiatric disorders in terms of enhancing their recovery from illness. The proposed transfer of the psychiatric hospital from its current location to be later housed within a multi-storey building to the west of Westmead Public Hospital at the site of Marsden Hospital is a retrograde step to mental health services and would create an atmosphere which is less conducive to emotional recovery and mental health stability. A well tended natural environment has a powerful therapeutic effect upon both psychiatric patients and the staff who assist them and upon the population as a whole. Populations worldwide equate quality-of-life with the health of their natural environment including the quality of the surrounding air. There is currently considerable areas of grassland growing within the precincts. Grassland removes carbon dioxide from the atmosphere and is an important carbon sink with carbon sequestration and as well, grasses release oxygen into the atmosphere. The open space grasslands and interspersed stands of trees should be maintained in the present format for the benefit of the psychiatric patients and also for staff and visitors to the grounds of the precincts as well as for the occupants of neighbouring suburbs in the Parramatta region.

The devolution of psychiatric hospitals and the discharging of millions of psychiatric patients throughout the western world from psychiatric hospitals into the community in recent decades has been an abject failure overall. A very large number of former or intermittently hospitalised psychiatric patients with serious psychiatric illnesses now usually live 'on the streets' or occupy the prison systems throughout the Western world. The largest psychiatric hospitals are now in the prisons, or as euphemistically termed, the correctional Centres. The psychiatric hospitals maintain an essential function for the wider community as well for the patients they care for. The psychiatric hospitals were not perfect but should have been 'fixed' rather than closed which occurred as a domino effect following the closure of the psychiatric hospital at Trieste in Italy. The 'fad' of closing the psychiatric hospitals across the western world was initiated in the late 1960s and early 1970s and has not serviced the community well. The former patients of the psychiatric hospitals were frequently placed into 'halfway houses' without the assistance of psychiatric nurses being permanently stationed in attendance as they had been in the psychiatric hospitals. The staff present at such accommodation were often the recipients of very short training courses without adequate experience in managing people with psychiatric disturbances. The provision of psychiatric care in hospitals is the responsibility of the government. The previously established psychiatric hospitals are still in existence in Sydney, primarily set alongside the Parramatta River and they still exist with beautiful grounds and buildings although their function has been generally decommissioned. At least part of the area of the hospitals including those in the Cumberland precinct should be refurbished for use for inpatient psychiatric services. Psychiatric patients require specialist health services from medical practitioners including psychiatrists and mental health (psychiatric) nurses are who are adequately trained to assist the patients. The halfway houses solve the needs of some people with psychiatric disturbance but are by themselves inadequate for managing the wider community of people with psychiatric disturbance, many of whom require acute or chronic inpatient psychiatric care which would be best delivered within psychiatric hospitals and natural settings such as what exists in the Cumberland precinct. The Cumberland precinct is an ideal location for the treatment of patients with psychiatric disorders.

4. The Cumberland and Sports and Leisure precincts have special emotional significance to members of the community including past occupants and staff, both clinical and non-clinical. As mentioned, the grounds and buildings of the precincts have been maintained by staff and occupants for more than 200 years. The Wisteria Fete has been held for many decades in September of each year in the grounds of Cumberland

hospital. The fete is an excellent example of a very well run event conducted by government employed hospital staff which fosters goodwill between the hospital and the community. The event is beneficial for both patients and the public alike. Many articles such as wooden toys have been made in the past by patients within the psychiatric hospital workshop and have been put on display each year for purchase by members of the public for their children. The public are invited to attend the grounds of Cumberland Psychiatric Hospital in the springtime of the year when a myriad of tended garden flowers and bushes are in bloom. The fete has given joy to a countless number of people over many decades. The hospital gardens were previously maintained by teams of hospital gardeners along with the assistance of many of the hospital's patients. Reduced government funding has seen the decline of the gardens and grounds compared to how it appeared many years ago, but the existing staff still do a marvellous job at maintaining the grounds and gardens as best they can.

The community has strong associations and emotional links with the hospital and the other areas within the precincts which have been cultivated over many years.

Many people have required hospitalisation or care or supervision of one form or another within the institutions within the precincts, such as at the hospital, or the gaol or at the Girl's Home. The precincts have very special memories and associations for those people and their families. The precincts also have particular significance for the members of staff of those who worked in institutions and their families. Some of those memories and associations have been traumatic, but they have also frequently involved rehabilitation and the reception of care often at a time before the advent of the currently established social security systems. These precincts should be regarded as a 'sacred site' for our community as a whole, both locally and nationally. The precincts should be preserved in their present overall configuration and protected. Designated areas within the precincts should be made open to the public for public viewing and trained personnel should be employed to conduct tours for historical education and to allow members of the community to retain their emotional links with the precincts. Parts of each building should be made available for inclusion within the tours which would be officially conducted within the precincts. There are multiple examples of historical sites across Australia being involved in well conducted official tourist activities. These include Port Arthur Penitentiary, Old Melbourne Gaol and Fremantle Prison. In England, the Tower of London represents a highly successful tourist activity by employing former police and military personnel to conduct tours. This venture simultaneously guarantees the preservation of the nationally significant buildings and historical items displayed to the public and continues the education of the public about historical events within the organised tours.

Brush Farm House formerly belonging to the explorer Gregory Blaxland (circa 1820) was recently restored to a magnificent state. The public are increasingly concerned about the potential loss of our historical heritage assets. These public sentiments have become obvious on Anzac Day when the populace has once again expressed increased affinity with our Australian ancestors.

The government proposed the sale of the Roselle Psychiatric Hospital formerly known as Callan Park Hospital for the Insane, but the public outcry was considerable and the government acted to preserve the site. The same principles apply here to the public importance and immeasurable value of the buildings and grounds of the precincts in North Parramatta. The proposed development of the precinct's site would be a destruction of part of Australia's most important heritage. Once destroyed these valuable assets would not be recoverable in their present unique form.

5. The public has not been truly consulted regarding the proposed development changes to the precincts. I have conducted a medical practice in the Parramatta region for many years and also live in the same area and I have not received any specific written notification from the government regarding the proposed development of the precincts. What broadcasting of the proposed developments have been made by the government in local newspapers? What targeted letter drops have been made regarding the proposed developments to the residents of Sydney? What national broadcasting on television and radio has been made by the government of the proposed developments in order to invite public comment?

I attended a purported public 'meeting' at the Parramatta Town Hall on Saturday, 29 November 2014 which was advertised in The Parramatta Holroyd Sun Community Newspaper on Thursday the 27th of November 2014. This event turned out to be a poster display and not a true 'meeting' of the public. The poster display occasion obviously did not intend to introduce the public to each other or to engage the public in any discussion with each other in an open forum. The public did not have any arranged opportunity to express

opinions to each other or to the government in an open forum. The posters were presented to members of the public by personnel who were friendly but who did not appear to be part of the government itself, but rather by a company employed to explain the intended actions of the government to the members of the public attended. That was not an example of public consultation. The representatives who were present were pleasant and informative but not did not have any official forms or other channels of recording comments or objections made to them by members of the public at the time.

Members of the public expressed discontent amongst themselves about the lack of any true public consultation process having been conducted for the proposed dramatic re-development of the precincts. 'Meetings' were held with particular invited members of the 'public' in the past but I as the spokesperson-author of this submission was not informed of their existence and only recently learned that the meetings were conducted at all. It appears that only certain People were contacted and invited who were regarded as 'key stakeholders' to attend these meetings. I have been told that the meetings often included Cumberland Hospital staff. Such meetings do not represent a true public consultation process and Cumberland Hospital staff have expressed their concerns to other staff members and to me about the future viability of their employment if they were to express their true opinions at hospital-based meetings if their opinions contravene the government's proposals.

6. Utilisation of the precincts and a plan for the future.

a. A true public meeting should be convened in a public forum at a place such as the Parramatta Town Hall or an even larger venue such as the Parramatta Stadium in order to allow people to express their views about the proposed redevelopment of these precincts.

b. The meeting should be held after the public have been more fully informed about the present governmental proposal and the considerable number of concerns regarding any proposed development. The government should include the comments of historical experts particularly those with detailed and broadly based knowledge of the North Parramatta precincts onto the government's present website regarding the proposed development of the precincts.

c. The government should take steps immediately to secure the protection of the buildings and grounds of the precincts. Such protection should include CCTV combined with remote sensors, with images being relayed to a more expanded security unit within the precincts.

d. The government should preserve maintain and restore where necessary the grounds and buildings within the precinct. The government should continue the program they have initiated of restoring the precincts buildings and successfully utilising the buildings for governmental purposes including expanding the use of the psychiatric hospital facilities for the care of psychiatric patients in certain sections of the Cumberland precinct. The government should also study the value of conducting officially conducted tours within the precincts intended to raise revenue for the government

e. The government should appoint a single body to oversee and coordinate the preservation and maintenance of the precincts. That body should include a governing board which would include historical specialists and representatives of the several historical societies from the Sydney region and in particular the Parramatta region, the National trust and other heritage organisations including the Heritage Council of New South Wales and the Heritage Council of Australia.

Summary

The buildings and grounds of the Cumberland Precinct and the Sports and Leisure Precinct within North Parramatta are invaluable national assets which have national significance for all Australians and they need to be preserved and protected for both our present and future generations.

Yours faithfully,

Dr Alan Fahey

Master of Psychiatry (The NSW Institute of Psychiatry)

Master of Psychological Medicine (The University of NSW)

Bachelor of Medicine and Bachelor of Surgery (The University of Sydney)

Emma Hitchens

From: Dr Alan Fahey <info@mindperformance.com>
Sent: Friday, 19 December 2014 5:00 PM
To: information-Planning
Subject: Cumberland Hospital and Parramatta Prison 19/12/14 Urban Renewal Proposal
Parramatta North

To: The UrbanGrowth NSW Project Team and
The Department of Planning and Environment and
The Parramatta City Council
Subject: Cumberland Hospital and Parramatta Prison 19/12/14

Dear Managers

This email is being sent to this address as we have been unable to locate the section at formal submissions for Parramatta north urban renewal on the website.

This submission is made on behalf of a group consisting of members of the staff of Cumberland Hospital, members of the public including residents in the vicinity of Cumberland Hospital and North Parramatta and business owners in the North Parramatta vicinity.

The grounds of the Cumberland hospital and the area for consideration of development proposed under the Parramatta north urban renewal project represent a unique region of both the metropolitan area of Sydney and the nation of Australia. The existing Cumberland campus and associated heritage buildings have special historical value.

They represent an existing time capsule demonstrating buildings from so many different eras of building throughout Australia's history from the late 1700s through to recent times.

The grounds and buildings belong to the state government but are an important part of Australia's historical beginnings and history and should be protected for the entire nation without major changes to the grounds or existing buildings.

At this stage there has been no truly public consultation process with the public as a whole.

I conduct a medical practice which is a business and also live in the area and did not receive any directed written notification sent to me regarding the sale or development of this area.

I attended a 'public meeting' advertised in The Sun, a local paper which was to be held at the Parramatta Town Hall on Saturday 29 November between 3pm and 5 pm, only to find out that no such meeting was being held and a poster presentation was in place, supported by representatives of the state government.

Other members of the public also attended expecting to be involved in a public debate about the merits or otherwise of this proposed development. We were all equally disappointed to find out that no public meeting was being conducted.

I have attended the grounds of Cumberland Psychiatric Hospital, previously known as Parramatta Psychiatric Hospital to attend the Wisteria Fete annually since childhood. I was previously the Town Crier for Parramatta for a period of five years, and as such have had a strong connection with the cultural heritage aspects in Parramatta and its significance to the wider community for most of my life.

The simulated images of what is being proposed for the Parramatta north zone shows multi storey buildings in close proximity to sandstone historic buildings. We believe that it is inappropriate to destroy the preserved historical aspects of the zone by incorporating multi storey residential or commercial premises into this zone.

We have strong heritage values still intact with many other artefactual features from the period of 200 years ago, including buildings with special markings from the convict era etched in stone and timber, and many historical relics still preserved by volunteers and staff members of the Cumberland Hospital such as those in the museum.

I saved a building at the hospital when I noticed that it had smoke billowing from the inside through an open doorway. I ran into the building whilst holding my breath and then exited shutting thus reducing the air and oxygen flow to the fire. Security and the Fire Brigade were then called and the building was saved.

Many people in the community have a strong emotional attachment to the hospital which has been a part of the community for over 200 years. My great uncle was a plumber at the hospital for decades in the early to mid part of last century.

The Tower of London in England has been preserved and is one of the world's most popular tourist destinations.

Many historical relics of been preserved and the establishment employs ex military and police personnel to conduct the tours of the castle-like establishment.

I have had a personal guided tour by the governor of Parramatta prison in 1992. The historical relics and artefacts in that establishment are precious and should be preserved. The cells were basically unaltered since their construction 1842.

I recently joined two tours at Fremantle Prison south of Perth in western Australia. The tours were conducted by ex military personnel and were extremely informative and educational. They also gave great insight into an aspect of Australia's past.

The New South Wales government could establish a similar facility in the demographic centre of Sydney at Parramatta in the Parramatta north zone in question.

If the buildings and walls of the Parramatta Gaol are returned to the public after the determination of the present aboriginal land claim then I believe it should become part of the Cumberland psychiatric Hospital and prison region and the whole region should be protected against residential development and established as a tourist destination with strict conditions.the building should be utilised by the government in a form which is meant minimally damaging to the heritage value that is contained there.

In summary, we propose:

1. That residential and commercial activity not be introduced into the Parramatta north urban zone
2. That the government continues to occupy the buildings as office sites with any necessary renovations which do not damage the historical value of the buildings
3. That the potential of the zone as a location for controlled tourist activities similar to those found at the Tower of London be investigated and considered
4. That true public debate is held as an open forum in a public space such as the Town Hall at Parramatta or in an even larger venue if required
5. That a more widespread and intensive public notification campaign be conducted rather than the previously limited notification given to 'targeted stakeholders'.

Yours sincerely

Dr Alan Fahey

MPsychiatry

0427 408 134



Office of the Minister for Planning and Minister for Women

DATE RECEIVED: 01 DEC 2014 FILE NUMBER: IM14/ 35297

A. MINISTER'S OFFICE
STAFF MEMBER: Name: MT



- B. AGENCY FOR ACTION
Department of Planning and Environment (DP&E)
Sydney Harbour Foreshore Authority (SHFA)
UrbanGrowth
CCRDC
Hunter Development Corporation (HDC)
Infrastructure NSW (INSW)
REFER TO OTHER MINISTER:

- C. ACTION REQUIRED
Minister to Reply
Assistant Minister to Reply
Parliamentary Secretary to Reply
DP&E to respond (Secretary, Deputy Secretary, ED)
Briefing Note
Parliamentary Folder Note
Acknowledge by CCU
Acknowledge and Close by CCU
For Information Only
Other Agency to Respond

- D. DEADLINE
Immediate (Priority - ASAP)
Urgent (7 calendar days)
Routine (14 calendar days)
DUE DATE: AUTHORIZED BY:

NOTES:
Heritage building in Parramatta

HIG: E

Received
04 DEC 2014
C.C.U.

Federation of
Australian Historical Societies Inc.

GPO Box 1440 Canberra, ACT, 2601
Phone: 02 6295 2837
Email: fahs@history.org.au
Web: www.history.org.au
ABN: 89 217 386 291

RECEIVED

01 DEC 2014

MINISTER GOWARD'S OFFICE

Ref: _____

Hon Pru Goward,
Minister for Planning,
52 Martin Place,
Sydney, NSW, 2000

25 November 2014

Dear Minister,

PARRAMATTA FEMALE FACTORY

The Federation of Australian Historical Societies is most concerned about proposed alterations to parts of the Cumberland District Hospital group of buildings in Parramatta, and in particular to proposals for the Female Factory.

The Female Factory is the oldest extant convict women's site in Australia, begun in 1818 and fully in use by 1821. The building was designed by convict architect Francis Greenway, on the orders of Governor Macquarie. Important modifications in line with then current penal philosophy were made by Governor Gipps between 1838 and 1839.

The Female Factory is a critically significant part of the Cumberland District Hospital complex, which was inscribed as a group on the State Heritage Register in 1999 (no.820). In the State Heritage register, the complex is described as 'a place of National Significance. It provides abundant physical evidence of the formative years of the Colony of New South Wales, and the initial settlement of Parramatta. It has been in continuous institutional use since 1818. What survives of the various buildings, relics and landscapes provides a valuable insight into changing attitudes to welfare, criminal behaviour and mental health, over a period of 175 years'.

The State Heritage Register also notes that 'The layout of the complex and the existing

relationships between buildings and spaces continues to convey the organising principles upon which the different institutional uses were administered and structured. The spaces created have continuing landscape significance and aesthetic appeal'.

The Federation strongly endorses these judgments on the significance of the place.

Although the Female Factory is not under threat of demolition, the whole site is under threat from housing development including two buildings proposed inside the Gipps area of the 1830s. For example, five openings have been proposed in the intact Gipps compound to enable traffic flow.

The FAHS believes that the Female Factory should have been included in the 2010 World Heritage serial listing of convict sites in which the Cascades Female Factory in Tasmania is listed, even though it was built later than the Parramatta Factory and little of it survives intact. The FAHS is also writing to the Federal Minister for Heritage, the Hon. Greg Hunt, to impress upon him the urgency of adding the Female Factory to the National Heritage list, thus making it possible to seek its inclusion on the World Heritage serial listing.

In the meantime, we request you to ensure that no work will be undertaken that might impact on the extremely high heritage significance of the Female Factory. The State Government has a duty to retain and maintain the site. The Female Factory already has economic value, is busy with sightseers and guided tours, and could be further developed as a major tourism asset to the state and nation. It is currently used for school visits relating to Convicts, Expansion of the Colony, Migration and Women's Studies, while adults in Probus and other clubs, as well as the rapidly expanding number of genealogists, also benefit from the site.

The Federation strenuously believes that nothing should be done to diminish the historical and heritage values of the Female Factory at Parramatta and that the factory footprint should be preserved for educational and tourism purposes in all its forms. We also urge that it be included in the World Heritage Australian Convict Sites.

Yours sincerely

A handwritten signature in blue ink that reads "Don Garden". The signature is fluid and cursive, with the first name "Don" and the last name "Garden" clearly legible.

Associate Professor Don Garden, FFAHS, FRHSV
0417169018
d.garden@unimelb.edu.au

Ms Carolyn McNally
Secretary
Department of Planning & Environment
GPO Box 39
SYDNEY NSW 2001

19 December 2014

Dear Carolyn

Re: North Parramatta Urban Renewal Plan.

Thank you for the opportunity to make the following submission regarding UrbanGrowth NSW's North Parramatta Urban Renewal Plan.

My wife and I had the opportunity to visit the Female Factory precinct at Parramatta recently, and noted its heritage significance with so many beautiful old buildings including a building and walls that date back to the Female Factory period. But we were appalled to learn of our State Government's Plan for the area. I have grave fears that the Plan as presented will have a devastating impact on what has to be **the most significant heritage precinct in Australia.**

The reasons for my concerns are outlined below:

- That the declaration of the project as one of State Significance removes the Heritage Council from the decision making process. If there was ever a situation where the Heritage Act and its operational authority were necessary to protect and preserve our national heritage, surely this is it. Only the proper involvement of the NSW Heritage Council in the decision-making process will produce a worthwhile development for the people of Parramatta, the State of New South Wales and the Australian Nation.
- The area outlined in the Plan has been predominantly public land since early European settlement and its continued management and control should remain as an integrated precinct that is managed by a single government agency to ensure the long term survival, co-ordinated maintenance, conservation and presentation of this state and nationally significant cultural landscape.
- The proposal places undue development pressures on the landscape and heritage of an area that will be much needed for open space for the increasing Parramatta population in coming decades.
- The scale and quantity of development proposed is contrary to the principles and guidelines provided in the Conservation Management Plans prepared for the NSW Heritage Council in conjunction with the State Heritage Register Listings.
- That the excessive development indicated in the concept drawings will become even more intensive given the past history of the Parramatta City Council for increasing building heights following subsequent applications after the initial approvals.
- Given the location, heights and density of buildings outlined in the proposal I vigorously oppose:
 - the construction of new multi-storey buildings in the Female Factory precinct
 - the construction of 16 storey buildings directly adjoining the Recreation Hall, Chapel and Parramatta Gaol
 - the construction of 4, 6 and 8 storey mixed use developments in Parramatta Park along O'Connell Street
 - the demolition of the highly significant residence of the Chief Attendant, 9 Fleet Street.
- That in addition to the points above it is essential that the Central Male Block which has a heritage value of "high significance" be retained.

- That parking provisions are inadequately addressed in the proposal and before any rezoning is contemplated a detailed analysis undertaken so that the full implications this issue are placed into the public domain.
- That the photomontages presented in the proposal appear to be very misleading and understate the impact on viewlines and values of the World Heritage Listed Old Government House and Domain
- That the proposal does not adequately address Aboriginal heritage, cultural and landscape perspectives and therefore further involvement of the Aboriginal community in decision making regarding this project be undertaken.

In conclusion, whilst I support the principle of sensitive adaptive re-use of heritage buildings, so as to provide for their ongoing heritage conservation and presentation, the lack of the necessary controls and management of such measures is not adequately assured in this proposal and until such is provided I cannot support its endorsement.

Yours sincerely

L. J. Whale

Les Whale
6 Mawarra Crescent
Marsfield NSW 2122



Office of
Environment
& Heritage

Our reference: DOC15/95115
Contact: Rachel Lonie 9995 6837

Mr Michael File
Director Urban Renewal
Planning and Environment
GPO Box 39
Sydney NSW 2001

Dear Mr File

Thank you for the opportunity to meet with you and Anna Johnston on 20 March 2015 to discuss the North Parramatta State Significant Site development. The purpose of this correspondence is to update previous advice provided on potential conflicts due to the proximity of development to a Grey-headed flying-fox camp on the Parramatta River (TRIM DOC15/37948 dated 17/02/2015) which contained 12,400 Flying-foxes in February 2015, and almost 17,000 in May 2014.

As we discussed, OEH has been actively engaged in a number of flying-fox camp management issues in the Greater Sydney Region in recent years. Future potential conflicts from noise and odour issues at the North Parramatta site, as well as unreasonable impacts on the welfare of the 'threatened' flying-foxes, can be minimised through ensuring that there are substantial buffers to new development.

Based on recent evidence and experience, the 20 metre distance previously recommended by OEH is unlikely to be adequate. OEH recommends that the Department of Planning and Environment ensure that further consideration is given to buffer distances to the GHFF camp. As discussed at our meeting, some recent findings support the need for a buffer of at least 50 metres from the flying-fox camp to future residential development to minimise concerns. It is recommended that residential buildings with an outlook to the camp have double glazing and appropriate sound insulation.

A minimum distance of 20 metres may be suitable for commercial developments, particularly if they are occupied during traditional daytime business hours and include air conditioning, with appropriate glazing, to reduce sound transmission. Outdoor areas, including balconies and courtyard gardens facing toward the camp would not be desirable. As we have experienced with the Kareela Flying-fox camp in the Sutherland LGA, facilities catering for very young (such as schools and childcare facilities) or disabled clients should not be placed in close proximity to flying-fox camps. This is because very young or disabled children may be exposed to health risks because they do not understand the importance of avoiding contact with sick or dead flying-foxes and informing a parent or carer if they are scratched by one of the animals.

Odour and noise impact studies should be undertaken to provide a greater understanding of the issues in order to fully investigate the impacts and to define the impact zone. OEH will also recommend to Parramatta Council that a Flying-fox Camp Management Plan is prepared for the Parramatta camp. Further information including a plan template can be found at <http://www.environment.nsw.gov.au/threatenedspecies/flyingfoxcampopol.htm>

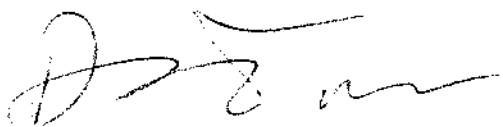
Further investigation of the Flying-fox camp is highly recommended. This should include investigating how the camp numbers fluctuate seasonally and the direction that the flying-foxes fly out each night as faecal drop is an important amenity consideration for surrounding residents. Camp numbers may be available from the Royal Botanic Gardens which has been undertaking census counts of flying-fox camps in the Greater Sydney Region as part of its dispersal licence since 2012.

Construction noise is likely to disturb the camp and may trigger dispersal of the flying-foxes. Construction in the southern area closest to the camp is therefore likely to have a significant impact on the flying-foxes and require the preparation of a Species Impact Statement under the NSW *Threatened Species Conservation Act 1995*.

The camp has been identified as a significant flying-fox camp at a national level which would require referral of any proposed development to the Commonwealth Department of Environment under the *Environment Protection and Biodiversity Conservation Act 1999*.

Attachment 1 provides further information on flying-fox management including several references that may be useful. Should you have any queries in regard to this correspondence please contact Rachel Lonie on 9995 6837 or by email at rachel.lonie@environment.nsw.gov.au.

Yours sincerely



DAVID TREWIN
Regional Manager Greater Sydney
Regional Operations

23/03/2016

ATTACHMENT 1

Office of Environment and Heritage (OEH) additional information on Flying-fox Camp Management in regard to the North Parramatta potential State Significant Site

1. Potential conflicts with Flying-fox camps

OEH considers that appropriate planning is key to reducing the potential conflicts that can arise for people living and working near a flying-fox camp. Conflicts with the proximity to a flying-fox camp to residential or other areas can include annoying noise and odour from the animals during the day, when the flying-foxes leave the camp at dusk to forage and as they return before dawn. Flying-fox droppings can affect residents and others as the flying-foxes often defecate in flight when they leave the camp. Odour impacts can be exacerbated if flying-fox numbers increase and/or during hot or humid weather conditions (Roberts 2006). People may also be concerned about diseases associated with flying-foxes however education on health risks can alleviate significant concerns. However, there is a general lack of quantified research on the human impacts that can arise from proximity to flying-fox camps.

2. Recommended buffer widths

Recommendations on buffer sizes vary and are available only from the 'grey' literature. Some recommendations are summarised below:

In the Management of Urban Flying-fox Camps: Issues of Relevance to Camps in the Lower Clarence, NSW (Roberts 2006) the author states that in order to reduce conflict, roost sites should wherever possible be isolated from human habitation by a buffer zone at least 300 m wide. The extent of this buffer zone should also be included in the definition of the camp. It is important that this buffer zone consists of habitat unsuitable for roosting by flying-foxes. For example, the area should be comprised of either cleared land, low shrubs or small isolated trees. Residential development, schools and other structures that might lead to conflict should be excluded from this area. The buffer zone must also commence from the outer limit of the roosting animals where flying-foxes roost during seasonal fluctuations or if there is an influx of another species.

The report recognises that a buffer zone of 300 m is often not possible "as urban development has already encroached onto the camp or flying-foxes have selected camp sites in close proximity to urban areas. In these cases, future development or management of the camp should attempt to create a buffer zone of at least 100 m as it has been recognised that residents living closer than 100 m to a camp are more likely to have strong negative attitudes towards flying-foxes (Larsen et al. 2002). Obviously, residents are less likely to be affected by factors such as smell and noise at greater distances from a camp site. Given the recognition that buffer zones assist in managing human-flying-fox conflicts, managers in Coffs Harbour and Melbourne have incorporated a distance of 60 m (and increasing) and 250m, respectively (M.Smith DEC Coffs Harbour pers comm, DSE 2005)."

The Management and Restoration of Flying-fox Camps: Guidelines and Recommendations (SEQ Catchments Ltd 2012) suggest a buffer of 300 metres is ideal with the buffer width as wide as the site allows. The report suggests the buffer area should consist of habitat not used by flying-foxes (e.g. low trees <3 m, cleared land, rivers, open space) and notes sparse plantings surrounding camps can be used by flying-foxes as roosts and should not be included in the buffer zone. Consideration of topography and prevailing wind direction can assist in determining distances. Most importantly, the report notes the usefulness of the buffer to reduce the impacts of smell and noise declines if the buffer is less than 50m.

The Ku-ring-gai Bat Colony Committee has recommended buffer zones exceed 200m for new development (see <http://www.sydneybats.org.au/flying-foxes/>)

Tim Pearson is undertaking a PhD on impacts of noise from Grey-headed Flying-fox (GHFF) camps. Ku-ring-gai Council has commissioned Mr Pearson to carry out noise testing for residents living near the Ku-ring-gai Flying-Fox Reserve at Gordon who have requested a 50 m buffer to the camp. Some preliminary findings are that the level of noise is the same next to the camp as 50 metres away so there was no advantage in clearing a 50 metre buffer.

Mr Pearson has found that it is not possible to estimate a suitable standard buffer width as the noise levels depend on the characteristics of the site, density and number of GHFFs in the camp which will fluctuate, the surroundings including hardness of surfaces and the time of year. It is suggested the best way of determining an appropriate buffer distance is to undertake noise monitoring of the camp over a few days, and compare this to standards such as those used by the Roads and Maritime Service for the level of noise that is considered 'acceptable' for new residential development close to main roads.

A further finding was that although a 50 metre buffer distance may be enough for most of the year, at peak times this distance will not be enough to address noise issues. Also, some residents may still be annoyed by the presence of a GHFF camp nearby regardless of the distance. Community attitudes are important to consider and community awareness and education may assist in raising acceptance of potential impacts and appreciation of the value of this threatened species.

References

Ku-ring-gai Bat Colony Committee <http://www.sydneybats.org.au/about-kbcs>

Roberts, B.J. (2006). *Management of Urban Flying-fox Camps: Issues of Relevance to Camps in the Lower Clarence, NSW*. Valley Watch Inc., Maclean. Accessed at <http://cv.wires.org.au/Roberts%202006%20Management%20of%20urban%20FF%20camps.pdf>

SEQ Catchments Ltd (2012) *Management and Restoration of Flying-fox Camps: Guidelines and Recommendations* (prepared as part of the *Improving Landscape Resilience to Climate Change in SEQ: the flying-fox roost & forage conservation pilot project*, coordinated by SEQ Catchments Ltd and funded by the Australian Government's Caring for Our Country). Accessed at <http://www.environment.nsw.gov.au/resources/animals/flying-fox-2014-sub/flyingfoxsub-jenny-beatson-part3.pdf>

(END OF SUBMISSION)

SUBMISSION : NORTH PARRAMATTA URBAN RENEWAL PROPOSAL 2014

Dear Sir/Madam

I am writing in response to the current NPUR proposal recently available for public comment. Having been brought up and educated in the area, as well as being a direct descendant of two women from the Female Factory (c1828), I have a deep attachment to Parramatta and its history.

INTRODUCTION

1. It is heartening to note that the potential of the Cumberland precinct, including the river environment has been recognised in the NPUR.
2. It is also heartening that the site has been accorded the status of “**State Site if Significance**”.

COMMENT

A. PRESERVATION OF COLONIAL HERITAGE BUILDINGS

Given the uniqueness of the Female Factory within the Cumberland Precinct, it is an absolute imperative that:

1. the original **Governor Macquarie** commissioned (c1818), Francis Greenway designed and convict built sandstone buildings are retained and preserved appropriately. This includes
 - i. the Matron’s quarters
 - ii. the 3rd class sleeping quarters and yard
 - iii the Gipp’s Courtyard where the solitary cells of the Factory are located
 - iv. the Greenway hospital
 - v. the original surrounding sandstone walls which uniquely define the site (1818-1830)
2. the later **colonial and historical sandstone buildings** (c1830) in the Cumberland Precinct are retained and restored.

The Female Factory Footprint must be recognised and preserved in any future **development** of the Cumberland Precinct.

To build a residential block within the Factory Footprint would be tantamount to building a residential block within the walls and precinct of Hyde Park Barracks. The absolute uniqueness of this near 200 year old site in Parramatta is extraordinary and must be preserved.

B. CURRENT CONDITION OF SIGNIFICANT HERITAGE BUILDINGS

The condition of some of the heritage Female Factory buildings is of utmost concern.

1. immediate assessment of **repair needs** and appropriate **interim restorative work** must be carried out in the short term by ‘public works’ to prevent any **further deterioration and loss of heritage value**- specifically
 - i. waterproofing buildings as required
 - ii. removing vegetation between sandstone blocks and re- render
 - iii. repairing the Female Factory 3rd class sleeping quarters, currently fenced off.

Improved custodianship of the site is long overdue. It is vital that the site’s heritage buildings are not irretrievably lost due to ‘planner’s blight’.

C. A UNIQUE HISTORICAL AND COLONIAL HERITAGE SITE

It is acknowledged that the North Parramatta Precinct, extending to Toongabbie Creek is so rich in both **Aboriginal and European history**.

1. The value and history of the North Parramatta Precinct must be further explored, interpreted and recorded in the **immediate** future before any development of the site commences. **Archaeological** investigation is imperative.
2. **The artefacts** from the site and from **the Female Factory footprint** must be preserved and selected items form a collection to be housed and displayed on site in the future.

With the richness and layers of occupation as well as exciting archaeological potential for the community, this area must be explored in partnership with an appropriate academic institution.

D. ADAPTIVE RE-USE OF HERITAGE BUILDINGS

The history and the multitude of stories from this precinct – **women’s stories** especially, need to be told and a repository/facility for this must be provided in future adaptive re-use plans through:

1. The establishment of a permanent **repository/resource centre** within selected heritage buildings on site.
2. The establishment of a **first class educational/discovery centre** focusing on the female convict experience as well as the multi-histories of the Cumberland Precinct.

There is such incredible tourism potential in the future preservation and development for this precinct and the Female Factory site in particular, to rival not only the Rocks, the Hyde Park Barracks BUT the World Heritage sites of Port Arthur and the Cascades in Tasmania. The multi-histories of this site, the fact that so much is tangible and intangible, its location in Paramatta and the large area it covers, render it unique in Sydney if not in NSW and the mainland.

E. CUMBERLAND PRECINCT PHYSICAL ENVIRONMENT –

There is evidence of strong **connectivity** between the **Cumberland Precinct, the Parramatta River and Parramatta Park**. The heritage and historical significance of the relationship and the physical environment as an expression of that must be recognised and preserved in any enhancement or future public use.

1. It is imperative that the **heritage ‘Bunya’ pines** within the Female Factory Precinct are retained. These are part of a corridor of Bunya trees planted by **Governor Brisbane** in Parramatta Park (c1821-1825).
2. It is imperative that the heritage and historical value of **the river bank** on the perimeter of the Female Factory is recognised and part of any restoration/adaptive use plan of the Factory or river site eg.,
 - i. women were brought from Sydney “by water transport” up the river to the Factory
 - ii. convict built sandstone steps remain in situ, behind the existing Factory wall (western).
 - iii. site views west to old Government House Parramatta must be preserved.

The section of Parramatta River which forms the boundary of the Cumberland Precinct is still tranquil and relatively unspoiled. It would be an asset to keep it thus for community and visitors to the site to enjoy and appreciate. It would also provide an excellent focus for local bushcare groups in the future.

D. CLARIFICATION : STATUS OF HERITAGE BUILDINGS (ref: page 61 SEPP)

I am seeking clarification re the following:

1. Which buildings are deemed “**buildings of Exceptional significance**” and included in the 25 to be retained?
2. Which buildings are deemed “**buildings of High significance**” and included in the 22 to be retained?
3. Which buildings are to be **demolished**?

Can one presume that all colonial buildings and the original sandstone walls will be retained? I would appreciate further information in this regard.

CONCLUSION

Thank you for the opportunity to respond to the PNUR proposal. It was a pity that a 3D model was not available in the Parramatta Town Hall this week which would have helped in providing further insight into the proposed Cumberland Precinct redevelopment.

This is quite an unprecedent, long overdue initiative and ‘**once in a lifetime**’ opportunity for politicians to get it right. The colonial heritage and value of the North Paramatta Precinct is ‘**beyond price**’ – it the “**jewel in the crown**”.

It is vital that the redevelopment respects the significance and sanctity of the site and its tangible and intangible value for generations of all Australians past and into the future.

I look forward to your response

Yours Sincerely



Ronda Gaffey

97995582

ahalcoop@bigpond.net.au

please acknowledge receipt



SUBMISSION : NORTH PARRAMATTA URBAN RENEWAL PROPOSAL 2014

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With the richness and layers of occupation as well as exciting archaeological potential for the community, this area must be explored in partnership with an appropriate academic institution.

D. ADAPTIVE RE-USE OF HERITAGE BUILDINGS

The history and the multitude of stories from this precinct – **women’s stories** especially, need to be told and a repository/facility for this must be provided in future adaptive re-use plans through:

1. The establishment of a permanent **repository/resource centre** within selected heritage buildings on site.
2. The establishment of a **first class educational/discovery centre** focusing on the female convict experience as well as the multi-histories of the Cumberland Precinct.

There is such incredible tourism potential in the future preservation and development for this precinct and the Female Factory site in particular, to rival not only the Rocks, the Hyde Park Barracks BUT the World Heritage sites of Port Arthur and the Cascades in Tasmania. The multi-histories of this site, the fact that so much is tangible and intangible, its location in Paramatta and the large area it covers, render it unique in Sydney if not in NSW and the mainland.

E. CUMBERLAND PRECINCT PHYSICAL ENVIRONMENT –

There is evidence of strong **connectivity** between the **Cumberland Precinct, the Parramatta River and Parramatta Park**. The heritage and historical significance of the relationship and the physical environment as an expression of that must be recognised and preserved in any enhancement or future public use.

1. It is imperative that the **heritage ‘Bunya’ pines** within the Female Factory Precinct are retained. These are part of a corridor of Bunya trees planted by **Governor Brisbane** in Parramatta Park (c1821-1825).
2. It is imperative that the heritage and historical value of **the river bank** on the perimeter of the Female Factory is recognised and part of any restoration/adaptive use plan of the Factory or river site eg.,
 - i. women were brought from Sydney “by water transport” up the river to the Factory
 - ii.convict built sandstone steps remain in situ, behind the existing Factory wall (western).
 - iii. site views west to old Government House Parramatta must be preserved.

The section of Parramatta River which forms the boundary of the Cumberland Precinct is still tranquil and relatively unspoiled. It would be an asset to keep it thus for community and visitors to the site to enjoy and appreciate. It would also provide an excellent focus for local bushcare groups in the future.

D. CLARIFICATION : STATUS OF HERITAGE BUILDINGS (ref: page 61 SEPP)

I am seeking clarification re the following:

1. Which buildings are deemed “**buildings of Exceptional significance**” and included in the 25 to be retained?
2. Which buildings are deemed “**buildings of High significance**” and included in the 22 to be retained?
3. Which buildings are to be **demolished**?

Can one presume that all colonial buildings and the original sandstone walls will be retained? I would appreciate further information in this regard.

CONCLUSION

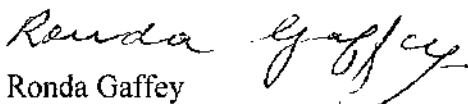
Thank you for the opportunity to respond to the PNUR proposal. It was a pity that a 3D model was not available in the Parramatta Town Hall this week which would have helped in providing further insight into the proposed Cumberland Precinct redevelopment.

This is quite an unprecedented, long overdue initiative and ‘**once in a lifetime**’ opportunity for politicians to get it right. The colonial heritage and value of the North Paramatta Precinct is ‘**beyond price**’ – it the “**jewel in the crown**”.

It is vital that the redevelopment respects the significance and sanctity of the site and its tangible and intangible value for generations of all Australians past and into the future.

I look forward to your response

Yours Sincerely


Ronda Gaffey
97995582

From: [Patricia Green](#)
To: [Emma Hitchens](#)
Subject: Parramatta redevelopment project
Date: Monday, 8 December 2014 8:56:04 PM

To: Emma Hitchens

Department of Planning & Environment

PARRAMATTA REDEVELOPMENT

I am concerned about the process by which this project is being conducted by a planning group Urban Growth. We witnessed a sales promotion of a solution at the town hall last Wednesday. I expected a public discussion on a political level to debate the merits of a major development in North Parramatta which endangers unique heritage sights. They say they have consulted interested groups such as the Heritage Society and have a web site to provide details of the project. This is not sufficiently visible for the general public to make a comment and there has been no discussion in the media. All we have seen are favourable artists' impressions. The Murdoch press and the local papers are all behind it. Where is the contrary case presented ?

Wrapping new buildings around heritage buildings is sacrilege. It devalues and distorts. You have got to see these buildings in their original context to get a feeling for history. This area is the closest to the early days of settlement and should be valued for that.

Currently, this is a beautiful and peaceful place creating an atmosphere which aids the recovery of mental health patients. They do not want to be confronted with high purposeful activity resulting from a huge increase in population density. Community housing in Fleet Street will be affected. The proposal to rezone the area to allow for commercial developments some up to 30 stories high will totally change the character of the area. Cumberland Hospital will be dismembered as wards and admin are moved supposedly under the umbrella of Westmead Hospital. Urban Growth could not tell me anything about how the mental health system will be affected. They are only interested in getting the building construction underway. There was no mention of how traffic flows will be affected. It is obvious that there will be great increase in traffic into O'Connell St trying to get onto Victoria Rd and onto the Great Western Highway and the M4, Parramatta Rd and Woodville Rd, crossing the CBD. I have not seen a traffic plan to go with the projected increase in population, not just in North Parramatta but also in the CBD with the construction of a university building and a 53 storey tower right across from St Johns Church. Surely, this is all fantasy. Is there any consideration for the people of Parramatta while all this is going on. The roads are clogged now. What will it be like in future?

There are better sights for development, Auto Alley for on. This is an ugly introduction to the city. It is close to major traffic arteries. Liverpool is a very ordinary centre. Its heritage areas line the Georges River and would be unaffected by redevelopment of the CBD. It has good traffic links being close to the Hume Highway and the projected airport. Population growth in SW Sydney is unhindered by geography, unlike Parramatta which has the park to the West and is cut in two by the river.

There is no particular “gateway” to the West. Use of this kind of imagery is no reason to overhaul a town centre which is today an interesting mixture of old and new and a vital connection with the past. Maybe growth is inevitable, but it must be done with sensitivity.

I hope that North Parramatta will not be rezoned and that the State Government will look kindly on the special needs of the mental health system which uses the area.

Alan Green

0410-795-176

8 December 2014

Louise Mansfield

From: Ronda <ahalcoop@bigpond.net.au>
Sent: Tuesday, 7 April 2015 12:12 PM
To: information-Planning
Subject: Parramatta North TRansformation Project submission ATTENTION: Anna Johnston

Dear Ms Johnston

I wish to submit the following comments in regard to the **North Parramatta Precinct Urban Renewal Plan** (now morphed to PN Transformation Project)

SUBMISSION :

1. There is **NO** specific recognition of the national significance of the Parramatta Female Factory and its substantial Macquarie/Greenway buildings and footprint.
2. There is **a paucity of detail** regarding the **future use** , **conservation** and **preservation** of the site – '*adaptive re-use*' is vague and unhelpful.
3. The integrity of the Parramatta Female Factory site is so compromised by **the proposed high-rise development**. The planned height and scale is appalling and must be reviewed.
4. There is **incorrect** information in the Plan ; historical material is either *not* identified or *incorrectly* identified - eg **the charnel house** of the Factory has been omitted as well as the **convict steps** down to the river- further, **the wall** in the second class yard is erroneously represented.
5. There is no mention of **archaeological assessment** at the North Parramatta Precinct site which is an absolute imperative.
6. It is most concerning that there is **NO** mention of **future custodianship** of the site, in particular the Parramatta Female Factory. Does this mean this is yet to be determined by community consultation and vision or is the 'sell off' to developers a given?

There must be **further** and **genuine** community consultation. The substantial multi-storey development planned is **anathema** for this site and surrounding area and seriously impacts on residents and, some of the most nationally significant historical and heritage sites we have in Parramatta, NSW and Australia.

Surely economic imperatives can be met elsewhere, and **NOT** by compromising this 'jewel' of a site for a 'quick buck' and political self-aggrandisement.

I would urge you to facilitate a meeting with key stakeholders which includes the residents, those who have extensive historical knowledge of this site, those who act as de facto custodians and those who share a vision for this extraordinary place.

It is imperative that the best possible outcome is achieved for the residents and for the future of this nationally significant heritage site. Therefore I urge you to action an extensive **revision** of the Plan.

Yours Sincerely

Ronda Halcoop
ahalcoop@bigpond.net.au



Contact: Michael Ellis
Phone: (02) 9873 8572
Email: Michael.Ellis@environment.nsw.gov.au
Our File No: SF14/26793
Our Ref: DOC15/40175

Michael File
Director, Urban Renewal
Department of Planning & Environment
23-33 Bridge St
SYDNEY NSW 2000

Sent via email to: Emma Hitchens <Emma.Hitchens@planning.nsw.gov.au>
Anna Johnston <Anna.Johnston@planning.nsw.gov.au>

Dear Mr File

**EXHIBITION OF PARRAMATTA NORTH STATE SIGNIFICANT SITE
PARRAMATTA NORTH URBAN RENEWAL—REZONING PROPOSAL**

The Heritage Council of NSW (the Heritage Council) considered at its meeting on 4 February 2015 the Parramatta North Urban Renewal (PNUR) rezoning proposal and resolved that the Heritage Council:

1. Supports the initial delegated submission on the PNUR rezoning application to the Department of Planning dated 19 December 2014.
2. Requires that prior to the approval of the PNUR rezoning application a 3-D model of the PNUR area and proposed building envelopes indicating total floor space per building be prepared and submitted to the Heritage Council for further consideration.
3. Requires that prior to the subdivision of PNUR area land and/or future development applications are submitted for the PNUR area that UrbanGrowth NSW prepare:
 - a. Consolidated CMP for the PNUR area and submit to the Heritage Council for endorsement.
 - b. Specific Precinct Conservation Policy report for each precinct and submit to the Heritage Council for endorsement, which establish a nexus with the consolidated CMP and could be used as an assessment tool for assessing future development applications for the PNUR area.
4. Remove all references to Conservation Agreements and Heritage Agreements from the supporting documents.

If you have any questions regarding the above matter please contact Michael Ellis, Heritage Officer at the Heritage Division, Office of Environment & Heritage, on (02) 9873 8572.

Yours sincerely



6/2/15

DR TRACEY AVERY
Director
Heritage Division
Office of Environment & Heritage

As Delegate of the Heritage Council of NSW



Contact: Michael Ellis
Phone: (02) 9873 8572
Email: Michael.Ellis@environment.nsw.gov.au
Our File No: SF14/26793
Our Ref: DOC14/278625

Michael File
Director, Urban Renewal
Department of Planning & Environment
23-33 Bridge St
SYDNEY NSW 2000

Sent via email to: Emma Hitchens <Emma.Hitchens@planning.nsw.gov.au>
Anna Johnston <Anna.Johnston@planning.nsw.gov.au>

Dear Mr File

EXHIBITION OF PARRAMATTA NORTH STATE SIGNIFICANT SITE PARRAMATTA NORTH URBAN RENEWAL—REZONING PROPOSAL

Reference is made to your correspondence dated 19 November 2014 that was received by the Heritage Council of NSW (the Heritage Council) on 19 November 2014 regarding the Parramatta North Urban Renewal (PNUR) Rezoning Proposal for the Cumberland Precinct (40 hectares) and the Sport and Leisure Precinct (12 hectares), which forms part of the PNUR area.

At its meeting on the 3 December 2014 the Heritage Council considered a summary report prepared by the Heritage Division regarding the PNUR Rezoning Proposal and resolved that the Heritage Council delegates the review of, and initial submission to the PNUR Rezoning Proposal to the Director, Heritage Division.

The PNUR area encompasses the following State Heritage Register (SHR) items: Parramatta Correctional Centre—SHR N^o 00812; Cumberland District Hospital Group—SHR N^o 00820; Norma Parker Correctional Centre—SHR N^o 00811; Former Kings School Group—SHR N^o 00771; and part of Parramatta Park—SHR N^o 00596.

The PNUR proposal has the potential to deliver to the community a sustainable and long term funding program for heritage restoration and management of the SHR places, and deliver housing, cultural uses and employment on the edge of the Parramatta CBD.

The Heritage Council supports the vision for PNUR having regard to the significant cultural landscape, which provides a unique opportunity to pursue a comprehensive world class urban renewal that builds upon the multi layered heritage significance of the area.

Generally the Heritage Council is supportive of an Indicative Layout Plan that will guide future open spaces, transport links and building footprints and heights; and congratulates NSW UrbanGrowth for coordinating the detailed studies for the PNUR proposal. However, detailed consideration will need to be given to the final built forms, materiality and fine grain detail of the public urban spaces to ensure a world class heritage-led urban renewal outcome for the SHR places.



The Heritage Council's initial delegated submission to the PNUR Rezoning Proposal is detailed on **Attachment A**, and a final submission will be submitted to the Department of Planning after the Heritage Council considers the matter at its meeting on Wednesday 4 February 2015.

The Heritage Council supports an ongoing and collaborative involvement with NSW UrbanGrowth and other key stakeholders, to ensure this State Significant heritage-led urban renewal project for PNUR is delivered in a timely manner for the people of New South Wales.

If you have any questions regarding the above matter please contact Michael Ellis, Heritage Officer at the Heritage Division, Office of Environment & Heritage, on (02) 9873 8572.

Yours sincerely

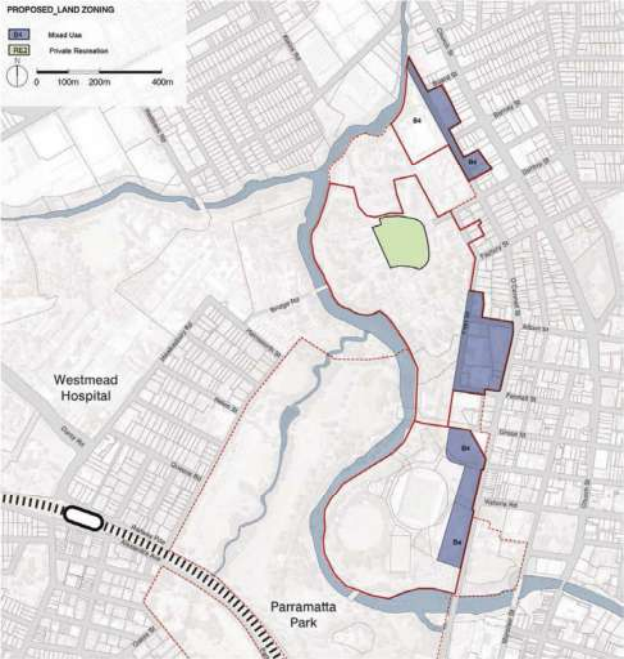
A handwritten signature in black ink that reads "Tracey Avery".

DR TRACEY AVERY
Director
Heritage Division
Office of Environment & Heritage

As Delegate of the Heritage Council of NSW

**EXHIBITION OF PARRAMATTA NORTH STATE SIGNIFICANT SITE
PARRAMATTA NORTH URBAN RENEWAL—REZONING PROPOSAL**

ATTACHMENT A

Parramatta North Urban Renewal—Draft State Environmental Planning Policy (PNUR) 2014 Planning Report dated 12 November	
<u>EXHIBITED MATERIAL</u>	<u>HERITAGE COUNCIL’S COMMENTS</u>
PART B: PROPOSED AMENDMENT TO THE PLANNING FRAMEWORK.	
<p>4.1 CURRENT LAND USE ZONES Parramatta LEP 2011 covers the entire Cumberland Precinct and applies the following zones:</p> <ul style="list-style-type: none"> • B4 Mixed Use • B6 Enterprise Corridor • R2 Low Density Residential • R4 High Density Residential 	<p>This section should identify that the Parramatta River’s edge is currently zoned W1 Natural Waterways.</p> <p>It is recommended to be replaced with:</p> <p>4.1 CURRENT LAND USE ZONES Parramatta LEP 2011 covers the entire Cumberland Precinct and applies the following zones:</p> <ul style="list-style-type: none"> • B4 Mixed Use • B6 Enterprise Corridor • R2 Low Density Residential • R4 High Density Residential • W1 Natural Waterways
<p>4.2 PROPOSED LAND USE ZONES AND DEVELOPMENT STANDARDS</p>  <p>Figure 8: Proposed zone map</p>	<p>It is recommended that Open Spaces’ 1, and Open Space 2 and the remainder of the ‘public open spaces’ identified in the Indicative Layout Plan, which is adjacent to the land use zone <i>W1 Natural Waterways</i> along Parramatta River’s edge is zoned <i>RE1 Public Recreation</i>.</p> <p>The Heritage Council considers this an important matter to be addressed and updated throughout all planning documents to ensure the future protection and public access to this section of Parramatta River.</p>

4.1 HEIGHT OF BUILDINGS

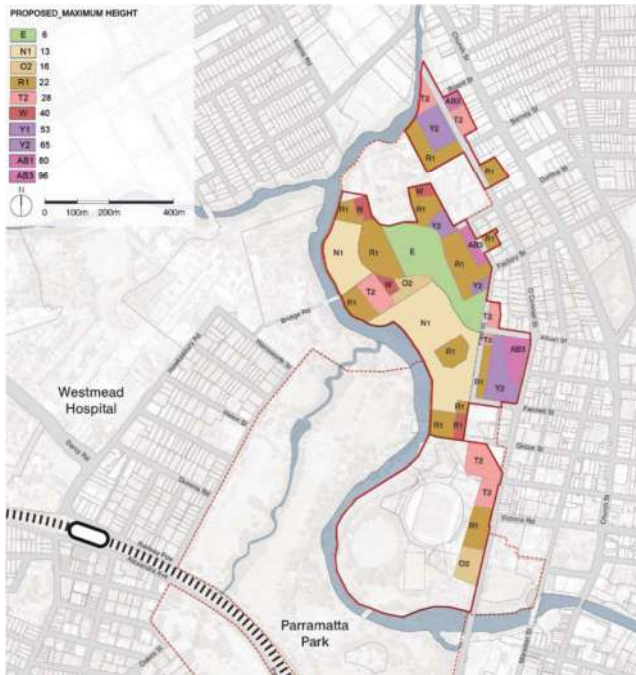


Figure 10: Proposed Height of Building map

It is recommended that Open Spaces' 1, and Open Space 2 and the remainder of the 'public open spaces' identified in the Indicative Layout Plan (ILP) are designated 'E'.

The Road Reserves identified in the ILP, should not be designated any height in the Proposed Height of Buildings map.

The Heritage Council considers these important matters to be addressed and updated throughout all documents.

4.1 HEIGHT OF BUILDINGS



Part view of Figure 10: Proposed height of building map.

Development lot E3

Development lot E3 is proposed to be designated R1, W and Y2; however, Y2 should be amended to Y1 to be consistent with the ILP, which indicates a building envelope in this area of 16 and 6 storeys.

Note that a height designation of Y2 would allow for a 20 storey building, which is not supported by the Heritage Council in this particular area.

Development lot G1

Development lot G1 is proposed to be designated R1, Y2 and AB3; however, AB3 should be amended to AB1 and reduced in area to be consistent with the ILP, which indicates a 24 storey building envelope in a reduced area.

Note that a height designation of AB3 would allow for a 30 storey building, which is not supported by the Heritage Council in this particular area.

Development lot G2

Development lot G2 is proposed to be designated R1, Y2; however, Y2 should be amended to Y1 to be consistent with the ILP, which indicates a 14 storey building envelope in this area.

Note that a height designation of Y2 would allow for a 20 storey building, which is not supported by the Heritage Council in this particular area.



Part view of Figure 12: Proposed additional Gross Floor Area (GFA) Map, showing the development lots.

Development lot F5

Development lot F5 is proposed to be designated O2 and W; however, it is considered that a 12 storey building envelope in this area, as indicated of in the ILP would harm the heritage values of the core heritage precinct. Therefore, the Heritage Council recommends that the W designation be amended to T2, which would allow for an 8 storey building.

Development lot F8

Development lot F8 is proposed to be designated N1, R1 and W (note W is incorrectly labelled R1)

It is recommended that the larger R1 designated area is amended to be 50% O2 and 50% R1, which would then be consistent with the ILP that indicates a 4 storey and 6 storey building envelope.

4.4 FLOOR SPACE RATIO

It is proposed that the Study Area be removed from the FSR map and statutory control applied through a maximum new GFA control.

The proposed GFA map (Figure 12) would be included in the Key Sites map of the Parramatta LEP 2011. This approach reflects the detailed urban design assessment that has been pursued to formulate the ILP.

Insufficient information has been provided to enable the Heritage Council to make a full and proper assessment, as to whether or not, the proposed GFA control is consistent with the GFA potential in the ILP envelopes for proposed developments.

The Heritage Council recommends that the proposed GFA control is amended to be consistent with the reduced yield proposed in development Lot F5, and that a detailed report is provided that demonstrates that the GFA controls are consistent with the GFA potential in the ILP envelopes for proposed developments.

11.5 PARRAMATTA POOL

...The pool site, currently zoned RE1 Public Recreation, is proposed to be rezoned to B4 Mixed Use. The pool and hard paved areas east of the stadium comprise an area of 29,040m² that is currently zoned RE2 Private Recreation. The central open space area within the Cumberland Precinct is proposed to be rezoned from the current B4 Mixed Use. This open space park proposed to be rezoned to RE2 Private Recreation has an area of 22,277m². Use

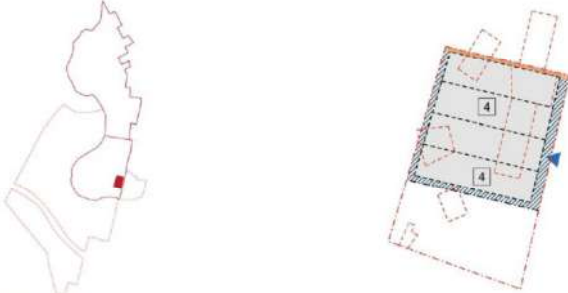
The character of the Cumberland Precinct is dominated by an institutional parkland landscape type with an open campus arrangement of buildings with varying historic significance.

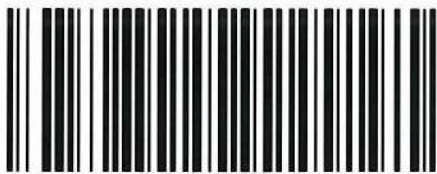
The Heritage Council supports that the central open space area with the Cumberland Precinct is proposed to be zoned RE2 Private Recreation, which will help mitigate adverse heritage impacts of development proposed in the vicinity.

<p>zone to RE2 Private Recreation which permits the pool as a land use and provides an offset against the loss of recreation zoned land. The application of the RE1 Public Recreation zone is not proposed at this stage as no government authority has agreed to it coming into public ownership. This could be a matter resolved during the assessment phase of the Study [sic].</p>	<p>Nonetheless, any reference to 'an offset against the loss of recreation zoned land' in relation to the amendment to the RE1 zone where the existing Parramatta Pool is currently located should be removed from the planning documents.</p> <p>The Heritage Council would not support a swimming pool located in the Cumberland Precinct or Open Space 3 (O/S 3), and recommends that consideration be given to integrating the pool and its facilities within the proposed building/s within development Lot SC and SD.</p> <p>Furthermore, to mitigate adverse heritage impacts of any development on Lot SC and SD the Heritage Council recommends that Open Space 5 (O/S 5) is identified on the ILP and details provided in the report entitled 'Parramatta North Urban Renewal—Landscape Re-zoning Report' prepared by Context Landscape Design.</p>
<p>Attachment 17: Schedule of actions for UrbanGrowth NSW as Government Co-ordinator</p>	<p>Items 3 Undertaking</p> <p>Replace words: 'Preparation of an Archaeological Research Design' with:</p> <p>'Preparation of an Archaeological Methodology and Research Design.'</p>

Draft Amendment to Parramatta Development Control Plan 2011	
<u>EXHIBITED MATERIAL</u>	<u>HERITAGE COUNCIL'S COMMENTS</u>
<p>4.3.5 PARRAMATTA NORTH URBAN RENEWAL</p>	
<p>4.3.5.4 Indicative Layout Plan (ILP)</p> <p>Each development lot is subject to specific development lot plan requirements at Section 4.3.5.10 and 4.3.5.11 which guide future development of the lots and provides controls...</p>	<p>Contains a misdescription (bold). Replace with:</p> <p>Each development lot is subject to specific development lot plan requirements at Section 4.3.5.12 and 4.3.5.13 which guide future development of the lots and provides controls...</p>
<p>4.3.5.3 Design Excellence</p> <p>Provisions 1. Development including buildings of 10 or more storeys must be considered by DEAP.</p>	<p>Change to 5 or more storeys or development involving significant heritage buildings must be considered by DEAP. See p.34 of Draft State Environmental Planning Policy (PNUR) 2014 Planning report for reference to 5 storeys. Given proposals for buildings of 6 and 8 storeys close to significant heritage buildings use of the DEAP is highly recommended.</p>
<p>4.3.5.7 Open Space Provision</p> <p>Controls</p> <p>C.1 Development applications for subdivision are to be generally in accordance with the Open Space Plan at Figure 4.3.5.5.5 Open Space Provision.</p>	<p>Contains a misdescription (bold). Replace reference with:</p> <p>Figure 4.3.5.11 Open Space Provision.</p>

<p>4.3.5.10 Built Heritage</p> <p>The <i>PNUR Built Heritage Management Strategy</i> (BHMS) has been prepared to guide development so that it avoids, minimises or mitigates impacts on significant buildings and structures and their setting. The BHMS provides general management recommendations as well as more specific requirements for each of the development parcels.</p>	<p>The Heritage Council will review and provide additional comments following receipt of the <i>PNUR Built Heritage Management Strategy</i>.</p>
<p>4.3.5.11 Historical (European) Archaeology</p> <p>The Indicative Layout Plan (ILP) includes new development within areas that have potential to retain significant archaeology. While it is preferred that archaeology of State and potentially National heritage significance is retained <i>in situ</i>, it is accepted that some limited areas may be affected to provide for the retention and conservation of the broader heritage values of the two precincts and facilitate their sustainable adaptive re-use.</p>	<p>All archaeology of potential National/State significance should be retained <i>in situ</i>, be interpreted and opportunities for further research be investigated. However, consideration of its removal will be merit based, taking into consideration its significance, intactness and the like.</p> <p>The Heritage Council recommends that this paragraph is amended to remove reference to 'it is accepted', as follows:</p> <p>The Indicative Layout Plan (ILP) includes new development within areas that have potential to retain significant archaeology. While it is preferred that archaeology of State and potentially National heritage significance is retained <i>in situ</i>, any removal will be merit based assessed, taking into consideration its significance and intactness.</p> <p>Some limited areas may be affected to provide for the retention and conservation of the broader heritage values of the two precincts and facilitate their sustainable adaptive re-use.</p>
<p>4.3.5.11 Historical (European) Archaeology</p> <p>The <i>PNUR Archaeological Management Strategy</i> (AMS) has been prepared to guide development so that it avoids, minimises or mitigates impacts on significant archaeology. The AMS provides general archaeology management recommendations as well as more specific requirements for each of the development parcels within the two precincts.</p>	<p>The Heritage Council will review and provide additional comments following receipt of the <i>PNUR Archaeological Management Strategy</i>.</p>
<p>4.3.5.11 Historical (European) Archaeology</p> <p>The relics provisions of the <i>Heritage Act 1977</i> apply across New South Wales. A Heritage Act approval will generally be required to undertake excavation within most areas of the Cumberland Precinct or Sports and Leisure Precinct, although some exemptions do apply. This approval requirement is in addition to any requirements of the <i>Environmental Planning and Assessment Act 1979</i>.</p>	<p>The Heritage Council recommends that this paragraph is amended to remove reference to 'although some exemptions do apply', as follows:</p> <p>The relics provisions of the <i>Heritage Act 1977</i> apply across New South Wales. A Heritage Act approval will generally be required to undertake excavation within most areas of the Cumberland Precinct or Sports and Leisure Precinct. This approval requirement is in addition to any requirements of the <i>Environmental Planning and Assessment Act 1979</i>.</p>
<p>4.3.5.13 Development lot controls</p> <p>Lot SD</p>	<p>The southern portion of development lot SD is indicated as <i>public open space</i> in the ILP and should also be designated as open space in the development controls.</p> <p>The Heritage Council recommends that the southern portion of the development lot is designated 'PUBLIC</p>

<p>LOT 5D Additional GFA: 6,938 m²</p>  <p>LOT IDENTIFICATION PLAN</p>	<p>OPEN SPACE WITHIN LOT'.</p>
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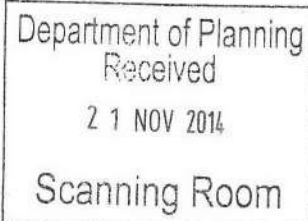
PCU057058

11 Wyralla Avenue
Epping NSW 2121
November 20, 2014

Urban Renewal, Planning and Environment
GPO Box 39
Sydney NSW 2001

Re: North Parramatta Urban Renewal

Expression of SUPPORT for this project.



However detailed site planning should not proceed until the light rail route from Parramatta to Castle Hill is decided.

I basically agree with the exhibited plans for the Parramatta North State Significant Site. The total of new 4100 dwellings for a site of that size is reasonable, and economically viable. In the past large parcels of government owned land have been given up far too cheaply in the face of any sort of community opposition, resulting in much of the development potential being under-utilised. In short we as a society have been obsessed with urban form, rather than developing a deeper understanding and enhancement of urban function.

The urban renewal aspects of this project are potentially a good fit with the emergence of Parramatta as a very significant CBD and cultural hub for the greater western Sydney region. A region that will soon account for half the metropolitan population.

Though there are three main shortcomings in the exhibited plans.

Firstly, there is the lack of security and safety considerations built into the plan. No doubt these precincts will develop as major tourist areas. In which ghost tours, and tales of colonial insanity and criminality will feature. However the really scary thing might be for residents and visitors to make their way around at night. Not only negotiating the scattering of preserved historical buildings in the Cumberland Precinct. But in accessing the Sports and Recreation Precinct, or the public transport corridors. Access to Westmead Hospital to the west poses a particular set of problems. The exhibited plans cover sight lines and views. However what is largely missing are detailed strategies to cover security risk contingencies. While many of the linear distance and accessibility diagrams are an absolute nonsense.

Secondly, while thorough in many ways; the exhibited report reminds me of some of the early 'flat earth' maritime maps. True there are no drawings of sea monsters, or cautions of "Thar'e be dragons!" But there is far too little consideration of the specifics of how the Cumberland precinct in particular, will interact with and influence adjacent areas. It is as if these precincts are colourful planning islands plonked down in a sea of grey. There should be a clearer indication of possible development patterns for these adjacent areas, particularly around O'Connell, Grose, and Fleet Streets.

Thirdly, the most significant of these shortcomings is transport and access. If a meaningful analysis of this was undertaken for the North Parramatta Urban State Significant Site, then many of the problems inherent in the two previous shortcomings could be overcome. It is for this reason that I will concentrate on some aspects of transport and accessibility planning, in particular the light rail route implications for these precincts.

I acknowledge that the light rail proposal is in a state of flux. When the exhibited plan was being compiled Parramatta City Council was pushing for two routes; one from

Parramatta to Macquarie Park via Eastwood; the other from Parramatta to Castle Hill along Windsor Road. Both of which are seriously flawed. They also proposed a separate spur line to Westmead which would impact on the North Parramatta urban renewal area. Unfortunately, that council has not examined the most basic question. 'How can light rail be routed through the CBD to the northern side of Parramatta Station (Darcy Street) without causing traffic chaos in general and disruption to bus services in particular?' As a matter of urgency the planning for the Civic Place project should incorporate provision for underground light rail access from Macquarie Street to the station. This access should be 'built-in' during the construction phase, rather than being retro-fitted at ten times the cost.

Parramatta to Macquarie Park via Eastwood, for reasons best known to themselves, was one of two routes suggested by Parramatta Council. I suggest that it is because it passes through the most of their city area, involves fewer local government decisions, and therefore fewer political costs. If it was ever selected it should be known as 'The Claytons Line'. For it is precisely the rapid transport line you have, when you don't have a cost-effective, high demand, high economic multiplier, or fast rapid transport line. This route does not offer an exclusive right of way. It would involve costly embedding of tracks into roads, travels through low density catchment areas, and would be slower and more inflexible than bus transport. Moreover any benefit of interchanging with the Northwest Rail at Macquarie University would be frittered away by a slow trip into Eastwood. A far better strategy for this corridor would be to complete the County Link Road planned between Brush Farm Park and Epping Road, via Eastwood, and incorporate peak period rapid bus transit between Parramatta and Macquarie Park.

In the past few weeks the state government has announced that four light rail route proposals are being considered:

1. Parramatta to Castle Hill
2. Parramatta to Epping / Macquarie Park via Carlingford
3. Parramatta to Olympic Park
4. Parramatta to Bankstown.

Parramatta to Bankstown is served by a metrobus route with faster travel times than could be achieved by on-street light rail. The absence of any off street right-of-ways for light rail, low density of the catchment area of any possible route, and the lack of patronage at night: all make the huge expense unjustified. Bus priority measures are a far better short-term solution.

In coming decades, the development of a twin track triangular junction at Lidcombe would be a better, more cost-effective option: to allow trains to directly run between Parramatta and Bankstown via Regents Park.

Only the first three light rail routes listed above, from the veritable spaghetti-bowl of potential Parramatta light rail projects, have merit.

At this point I must declare that I am not an enthusiastic fan of light rail. I have also been very disappointed with planners' overactive imagination in drawing up fanciful octopus-like networks of light rail centered on Parramatta. Most of these unnecessarily duplicating existing rail, and high capacity, high frequency bus routes. The desire for transport choice must be balanced by the fact that, to a large extent the provision of public transport, in economic terms involves natural monopolies. To mindlessly duplicate is a MAD policy, ensuring Mutually Assured Deficits.

I am equally disappointed with politicians and so-called green advocates who present light rail as a simplistic panacea for urban problems; and unthinkingly bleat a chant reminiscent of 'Animal Farm': "Buses bad, Light rail good"! Safety and congestion issues inherent in having light rail operate in heavy traffic flows are seldom discussed.

In its simplest form the economic argument against the wholesale introduction of an on-street light rail or tramway network, can be found in any introductory economics textbook. Specifically, it is located in the section on fixed and variable costs. Recent experience in Australian street- embedded light rail projects, such as in the Gold Coast,

and Adelaide, puts those track costs at well over \$20,000 per metre. Economic rationality must be considered, and the emphasis shifted from a naive championing of light rail projects, to a careful selection of the right rail projects.

A detailed description of and justification for these three optimum light rail routes, are as follows. Wherever possible the light rail should be on its own right of way, or at least separated from heavy traffic. Similarly the light rail vehicle should be given priority when crossing intersections.

We have a long history of importing 'experts', 'mister-fixits' and 'transport czars' from London to plan, fix, and run Sydney's transport. It is a bloody pity that we have not imported more yellow paint. For throughout London, and indeed the whole of Britain, yellow lines to restrict parking on major arterial roads and 'high streets' are the norm. Have plans to provide more off-street parking, parking in side streets, and assist in the redevelopment of redundant 'shoe-string' shopping strips, by all means. However, the fact remains that our transport arteries are precisely that, traffic arteries. Clog them up with parking, and then slot in light rail, and you have circulatory failure.

1. PARRAMATTA TO CASTLE HILL

The route that would best serve the North Parramatta urban renewal precincts.

This route would leave the Parramatta Station under the Civic Place, and proceed west along Macquarie Street. Note that in order to prevent congestion and service delays, it would be better for most light rail services to 'run-through' rather than terminate at Parramatta Station. Also note that under no circumstances should this light rail line run up Church Street. As the construction phase would kill business in this unique 'eat street'. While the light rail when completed would be mired in traffic congestion. Severe congestion potential would also dictate that this light rail not slavishly follow Windsor Road.

Therefore the line should turn north into Marsden Street. Serving the Justice Precinct, Riverside Theatre, and encouraging a future expansion of the restaurant and entertainment area. A new Arts Centre on the site of the old Kings School would also be facilitated by this route. Continuing north in a straight line through Marist Place, and along Villiers Street, west into Grose Street crossing O'Connell Street where a stop would service the Parramatta Leagues Club and the football stadium. If a redevelopment of property at the western end of Grose Street permits, the line should be directed north to join Fleet Street. (If a redeveloped access cannot be achieved through Grose Street, then sub-optimal access to Fleet Street could be achieved through Fennell Street from Villiers Street.) From Fleet street the line would enter the Cumberland (Hospital) Precinct, taking the best alignment to preserve historical buildings and to provide the optimum location for a precinct station. Because space is at a premium for redevelopment, the site is a river terrace with soft alluvial soils, and extensive underground parking will have to be constructed anyway; it would be best to cut and cover as much of this route through the Cumberland Precinct as possible. The soil is relatively rich, and during construction would most likely be stored piled, then relaid, rather than be trucked away. Crossing the Parramatta River the line would service the Childrens Hospital / Westmead Hospital, and then proceed up Redbank Road to serve the industrial area, and new unit development along the Cumberland Highway..

Cross Briens Road at the controlled intersection, run along the periphery of Redbank Reserve, and cross Park Street. From here the line would continue north following the edge of the ribbon reserve, which is at present largely overgrown and degraded bushland along the Quarry Branch Creek. This would give the light rail an exclusive right of way to the M2 Motorway, with potential stations at Hammers Road (Old Toongabbie, Northmead), Moxham Road (Winston Hills, Northmead), and Churchill Drive

(Winston Hills, Northmead). Synergies with the North West Rail construction could be achieved by using the tunnel spoil to engineer the permanent way gradients along this route. Similarly the Parramatta City and Hills Shire Council and residents, could be 'compensated' for this loss of area from what is at present nominal reserve. This could be done not only by the improved transport amenity and rise in property values. But also through the creation of useful play areas, walking trails, improved access and security.

After a tunnel underpass to take the line north beyond the M2, a cut and cover tunnel through Yattenden Park Would bring the line to the Western side of Windsor Road. From where it would continue that alignment to serve the Baulkham Hills shopping precinct. Some resumptions of property would be necessary here, but they would have been necessary anyway to accommodate road widening; because of the rapidly increasing population of this northwest region. In any case unused portions of resumed blocks could be 'recycled' back to higher density development projects. This route would also redress one of the strategic mistakes of the North West Rail. That is, you cannot hope to adequately serve the Hills District without serving the transport node that is Baulkham Hills.

Proceeding up the western side of Windsor Road. The line should cross it at Baulkham Hills High. Then proceed along the periphery of that high school and the adjacent Western Sydney Institute of TAFE. A natural place for positioning a station. Again any surplus land from resumptions here would be very useful to these expanding state educational institutions. The line would then proceed along the western side of Old Northern Road to a station at Excelsior Avenue. Continuing along the surface to Purser Avenue where it would be best for the line to enter a dive, and genuine tunnel to take it to a terminus at the new underground Castle Hill train station. The possibility of constructing this section concurrent with work on the North West Rail should be seriously considered.

By interchanging with the North West Rail this route would functionally link the whole north west, and particularly the Hills District with the Parramatta CBD. These regions are mutual sources of labour, as well as natural catchment areas for products and services.

This line will have a huge multiplier effect in calling forth new residential and business investment. It would improve the connections between the North Parramatta urban renewal precincts and the Parramatta CBD, Westmead Hospital employment, and give access to the whole Hills and northwest region by connecting to the North West Rail. In short it would be the North Parramatta precinct's best marketing strategy.

The other two light rail projects that would complement this route are also outlined below. Both would directly improve the connectivity and amenity of the North Parramatta urban renewal precincts.

2. PARRAMATTA TO EPPING, VIA CARLINGFORD.

The route has a strategic importance. It is in political terms 'unfinished business'. As far as deriving cost-effective economic benefit it is 'low-hanging fruit'. Since only \$400 million has been allocated as being potentially available for Parramatta Light Rail, this is the priority project that offers the most 'bang for those bucks'.

Most importantly, there is a 5.4 kilometre single railway track, with sufficient easement to take two light rail tracks from Camellia to Carlingford. Beyond Carlingford Station, there are a further 500 metres of railway and electrical transmission reserve, which reaches almost to Pennant Hills Road. Running light rail on conventionally laid railway tracks is many times cheaper than tracks embedded in public roads, and the maintenance costs are far cheaper too.

South of Camellia Station there are 2.4 kilometres of dual railway track with a station platform serving the Rosehill Gardens Racecourse, which could be served by a light rail shuttle service on racedays. Further south this line reaches a western / southwest line train station at Clyde. Though that area around Clyde Station would be better utilized as a light rail stabling and maintenance facility. If this light rail is to be connected with western line heavy rail, it would be better to construct a bridge over Duck Creek /River and travel the short distance along East Street to Granville Station. As Granville is a busy inter-modal transport interchange and rail junction. Though such a link to Granville would be decades away and dependent on the high density urban renewal in the Harris Park / Rosehill area.

Therefore the immediate proposed route would for a light rail vehicle to leave its station under Darcy Street; connected to Parramatta train station. Then travel under the Civic Place to travel east along Macquarie Street; cross Robin Thomas Reserve in a short cut-and-cover or mounded tunnel (alluvial deposits and soft shale bedrock). Then to run on a reserved street level easement east along Hassall Street (north side). Crossing James Ruse Drive, it would follow the existing railway easement and have stations at Camellia, Rydalmere (serving the University of Western Sydney campus and Victoria Road bus interchanges), Dundas, Telopea, and Carlingford. All those station precincts have tremendous potential for higher density redevelopment.

Carlingford has already experienced considerable unit development. However, it is becoming critical that the route beyond Carlingford Station is decided upon, and preserved, so that it is not 'closed out' by any individual building project. The Bunnings hardware site, the old Carlingford Post Office and surrounding shops are all likely to be redeveloped in the near future. From that reserve a short tunnel / underpass will bring the line under Pennant Hills Road, into Keeler Street, where there would be a station for the Carlingford shopping precinct.

A relatively straight 1.8 kilometre route along Keeler Street (Carlingford) (station near Pennant Parade (station), Mars Street and George Street (Epping) to Midson Road (station). This route runs roughly parallel to and one block from Carlingford Road, and is relatively traffic free. A total of six corner properties (2 at each crossed intersection) would likely have to be resumed to straighten the alignment and to provide platform and waiting areas. Again, this area would have tremendous potential for high and medium density development incorporating district views.

From Midson Road to Kent Street, Epping, a distance of under 500 metres the alignment would have to be through approximately a dozen resumed properties. Ideally by means of a cut -and-cover or mounded tunnel. These blocks could later be used as parklands. An amenity that would make a spine of redevelopment, following the light rail route and ridge, a very attractive proposition for both developers and residents.

Such development would solve a dilemma for government. While high density development has been sanctioned in the designated Town Centre around Epping Station. The economics of acquiring such expensive land, and making sufficient profit, do not make building such planned unit blocks an attractive prospect at present. So while developers may be willing to opportunistically land-bank, they are reluctant to proceed to the actual construction phase. Particularly with the specter of deflation looming over any future economic downturn. So while governments are giving this high density Town Centre the 'go ahead', it will not go ahead at the rate they envisage. This means that urban consolidation targets will be pushed further into the future as the Sydney Metropolitan Area races towards a population of 6 million.

Traveling through a cut-and-cover tunnel made in deep clay and shale bedrock. This would provide the optimum gradient and allow the light rail to pass under Kent Street, between the unit blocks of 38 and 40 Kent Street. Again using cut-and-cover construction techniques (also some underpinning of the adjacent units). In an alignment that destroys

fewest trees, the route will pass under Boronia Park. Then under the Parramatta City Council carpark in Rawson Street, which is itself being talked about as a potential redevelopment site as a Town Square with underground parking. It would make sense for these projects to be implemented concurrently and seek to achieve economies of scale in the construction. A tunnel underpass then taking the light rail beyond Rawson Street to an underground station beside the Epping Hotel / Epping Station overbridge. The whole site of old shops and vacant lots on the northern side of Rawson Street through to Beecroft Road (between the Genesis complex at the corner of Beecroft Road and Carlingford Road, and the Epping Hotel) is slated for a high rise retail, commercial and residential development. Though there is a rather petty dispute over the incorporation of a council owned redundant laneway within this site. Incorporating a light rail station would be a bit of a 'quid pro quo' swap, and would make great commercial sense for the developers because of the high pedestrian movements and transport accessibility. It would also be a reality check for the council. A chance to put some 'skin in the game'. Councils, like their more vocal and politically activist conservationist and environmentalist residents, are all too willing to scream for transport improvements, and funds from state and federal coffers. However they are often reluctant to make any concessions or change densities and streetscapes to accommodate those improvements.

The line would terminate at Beecroft Road, a short 70 metre walk to the train station concourse. There is no point in trying to extend the line to Macquarie Park, because that only duplicates the soon-to-be high frequency North West Rail; and the bus only lanes on Epping Road. Moreover, the conversion of the Epping-Chatswood line to a single deck PPP-financed and run system, incompatible with the rest of the Sydney Trains system, makes a heavy rail Parramatta-Epping line unnecessary. Since a major strategic argument for that heavy rail link was to allow through-running of western line trains to the employment concentrations of Macquarie Park and Chatswood. Additionally now, with the growing concentration of office employment in Parramatta, including relocations of government services; there is a greater strategic need for rapid public transport access from the north shore, northern districts, and the hills to the Parramatta CBD.

The M54 metrobus route, from Macquarie Park to Parramatta, should continue. However, a simple route change would make it more complementary to, rather than competitive with this proposed light rail. This would be from Epping to divert it south along Midson Road, to serve the high and medium density developments at the former Channel 7 site, the former brickworks, and aged accommodation at the Alan Walker Village. By going west along Mobbs Lane. With new traffic lights; north along Marsden Road to resume its present route at Pennant Hills Road. This would also promote the potential for higher density development along the ridge that is Marsden Road. This area has spectacular views over Parramatta and the Cumberland Plain. Note that views always appear among the top four attributes in surveys of peoples' real estate wish lists.

With the Opal Card there needs to be a pricing regime that encourages passengers to not only use public transport, but to be more flexible and willing to change modes. There needs to be 'railway pricing' of total journey, regardless of how many times you change trains. Rather than being penalized each time you change modes or routes. This will have to occur to ensure the viability of any light rail system in the Sydney metropolitan area, and particularly in Sydney's west.

Though the future viability of light rail in western Sydney does not simply hang on its ridership and costs. It is the potential to have multiplier benefits by encouraging the development of higher population densities, development of town centres, and concentrations of employment, that will define its success.

3. PARRAMATTA TO OLYMPIC PARK

This line would be decades away and would depend on how quickly the Parramatta East / Harris Park / Rosehill axis along Hassall Street is redeveloped. This in turn is dependent on the growth of the Parramatta CBD, and the increase in Sydney metropolitan Area population.

It would also depend on the future of the Shell refinery complex. This is an area that is rapidly losing old industry, and may present a two square kilometre area for greenfield redevelopment, with access to river frontage, Rosehill Gardens Racecourse, and close to the Parramatta CBD. All within the geographical centre of metropolitan population, and potentially only a short light rail link to the wider transport network.

If this urban renewal development goes ahead, then it is a 'no brainer' to junction-off the Parramatta-Epping light rail line at Camellia. Then proceeding along the alignment of Grand Avenue to facilitate the first stage of development, which would be along the riverfront. As development picks up pace, it would also be logical to extend this line across Duck Creek /River servicing Silverwater. Though more importantly to link the sporting hub of Olympic Park with the entertainment and accommodation of the Parramatta CBD. Also to link up with the spur heavy rail line which terminates at Olympic park. This would be best done using cut-and-cover construction through the soft alluvial deposits and dumped spoil of the Bicentenary Parklands.

In conclusion I urge professional representatives from both Transport for New South Wales and Planning and Environment to get together and co-ordinate their planning for and provision of light rail and urban renewal in the North Parramatta precincts. Not only will this deliver integrated projects achieving synergies and economies of scale. It will also be world's best practice, and planning practice for the really big urban renewal in the precincts to the east of the Parramatta CBD.

Kind Regards

Plus a declaration that I have made no political donations of any kind, reportable or non-reportable, within the past two years.



(JOHN JOSEPH)

Emma Hitchens

From: Parramatta North Project <parramattanorth@urbangrowth.nsw.gov.au>
Sent: Tuesday, 23 December 2014 8:52 AM
To: Emma Hitchens
Subject: FW: Emma Hitchens Dept Planning and Environment
Attachments: Urban Growth Proposal North Parramatta.dec14.doc; Untitled.pdf

Emma, this email came to our project email address.

Regards,

Belinda Thompson
Project Communications Advisor

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From: C.C.Kearney [<mailto:cke04663@bigpond.net.au>]
Sent: Friday, 19 December 2014 8:46 PM
To: Parramatta North Project
Subject: Emma Hitchens Dept Planning and Environment

Dear Emma

Unfortunately it is now 8.42pm on 19th December.

I met you at the Parramatta Town Hall Exhibition of the Urban Renewal Project on the rainy Wednesday night.

I misplaced your business card.

Would you please accept this submission, although I realise it comes via the Urban Growth email address.

Many thanks

Clare.

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Response to Urban Growth Proposal North Parramatta

Date: 17th December 2014

Introduction

I write as a person with 30 year history of working in adult mental health services. This includes Forensic mental health, dual disability comprised of intellectual disability with a mental health condition; mental health problems associated with drug and alcohol misuse and other rare conditions which manifest with physical, intellectual, and mental health conditions co-existing as degenerative and prolonged syndromes associated with rare disease. Children of Ex-Servicemen have featured in our work. Decades ago I read the historical notes of Australians returning from 1st and 2nd World Wars – men mostly, who could not return to their work on a farm, in a factory, in an office, or Bank. Their notes were particularly telling about the randomness and the chance of mental health disorders. This illness which afflicts the mind, ambitions, is often life – long; through no fault endures as episodic, mild or severe. These Australians are so often Unseen. The new Unseen are the refugees from Sierrie Leone’s Civil War, the families fleeing the conflict in Yugoslavia (children then but young adults now); the often complex trauma suffered by people of Aboriginal indigenous descent; the family who wonders and worries in another language, little acquainted with mental illness. What of those brave enough now to speak about their abuse as children, though aged in their 50’s /60’s in the 21st Century, for long have they carried the burden of a society blind to their trauma in this Country. The families facing the grief-filled challenge of their own death in their 80’s or 90’s while their son, daughter, two sons, or two daughters in some cases, with a life long affliction of all the syndromes which make up mental illness, who will care for them?

Just as there is an architecture of the built environment, there is an architecture of the mind.

- Any slip or mis-calculation in the built environment can be costly – so it is with the architecture of the human mind. Written by genetics, this code is revealing, the stress of life like the stress in a building, is a risk unknown. Architecture of the built environment attracts awe, wonder, it is seen – it is tangible. It can be costed, sold, built as part of a commercial enterprise for urban growth. Architecture of the mind, this is less the subject of commerce, of art or preservation. It is intangible, it is harder to perceive, it is the responsibility of a Gov. department, service, NGO if you will. It is the responsibility of a mental health Act which takes a stand for society, seeks goodwill from Government services, yet slowly erodes all humane alternatives in a modern society, capable of more and yet at risk of delivering less in 21st C. mental health care. In this gap there exists an opportunity for Urban Growth to prosper the original fortunes of Parramatta, once built on mental health service and asylum care. Urban Growth can contribute to sponsorship of modern mental health care. Urban Growth can build new models, provide work options as they currently exist on Eastern Campus – this is the building of community and a centre of excellence in modern Australian Mental Health Leadership. This option awaits a humane and different commercial enterprise, investment in the real community to which mental health issues directly relate.

The Unseen Australian has recently been identified in another way – the SMH stories Sunday 14 December are two recent examples. (1) “I won’t let Grandad just disappear”. This account reminds us that a population of our citizens who are older, feel they are unseen. (2) SMH 14th December 2014 page 12 My Story article, “My dad has Bipolar”. In these two stories alone, are the echoes of the family who knew this person over the course of their life. Yet these stories could be from ROZELLE Hospital, choose a date like 1924. This could be a story from Gladesville Hospital, 1952. The story of unseen people is the story of Mental Health in Australia. Items attached.

The Richmond Report is famous in Australia. One of it’s Author’s said later in life of the part he played in consulting and delivering the report, that he would have preferred not to have been involved. *Unforeseen Consequences* rather than a true grasp of ambitious ideals entailed in that report, may well have driven some of the regret evident in the Author’s reflection. This report resulted in premature goodwill, where the idea overtook the reality. The consequence did slowly unfold. Was the reality a good approximation of the ideal? How much have we admitted as a result? Was it a real form of community care, or relocation of the unseen. Their existing community often called an “Institution” *was their community*. In the process of implementing “Richmond” people lost relationships with a community which accepted them, knew them, cared for them, gave them identity and preserved most of the time, a humane treatment for those in need. Was there a true freedom awaiting their arrival in community? Institutions are not really built structures, they are beliefs held together by convention, tradition, people. Thus the institutions did much that was good. Are we facing the continued erosion of an institution of benevolent mental health care in this State?

And so we face the immediate problem of Australian’s unseen.

Australians trust Governments, Community’s and Society to model caring institutions. To be worthy of their trust entails a highly significant and complex duty. Could this extend now to Urban Growth.

What is this network of interests & community?

Having recently attended a business forum in Parramatta with high level representation of Business Agencies , where Gov. Depts, Non-Gov Representatives were present, it was striking to hear the invocation to Indigenous Owners at the commencement of the Chairperson’s introduction. However, immediately followed a most unexpected welcome, a second invocation. This was a reference to the Convicts who fostered the growth of this community – our historical forebears who built Parramatta. With bated breath I thought surely there will be mention of the Convict & later Mental health population of North Parramatta from 1831 onwards, the most heavily represented cultural community perhaps at that time in Parramatta. Thereby also, was a workforce, business houses, urban development and goodwill. But no mention was there in December 2014 of the cultural community and the original township built largely on the provision of accommodation and quality of life as could best be achieved in those quarters, centuries ago. Unseen still.

The silence remains in 2014.

URBAN GROWTH has identified the same land parcel as a focus for development in 2014. Yet it is developed. It is specialised as a community. It is relatively young, speaking from an Australian

historical perspective. There is a Museum at Cumberland Hospital to tell this story. People live in a community, with their carers, an institution of goodwill comprising the many facets of specialised and necessary mental health care in Parramatta, still today.

This proposed 2014 urban development is pictured as sitting alongside a Riverbank, with views, cosmetic precincts for enjoyment, where an affable lifestyle and high end comfort are envisaged.

To consider this further, the same Riverbank is currently and was forever from the time of the Convicts and the Mental Health Population, their place, view and solace.

Once upon a time, these human service industries engineered much of the growth in commerce in this young colony. Reflecting the values, times and pressures of the English economy, an outpost was created. Tethered from Rozelle Campus to Gladesville, on to Rydalmere (now UWS), Parramatta, then Bathurst and Goulburn, beyond. The major history of this care and commerce leaves an imprint on the State.

This history is captured in buildings. Yet the real history is unseen. These buildings are not past their use-by date. They are in use. They have value as part of a community. This model has now been borrowed & incorporated into an Urban Growth plan: mixed use. Ownership as we have learned is sometimes a right, not a title. This call to duty urges us to be cautious and learn from hasty judgements about something unknown - mental health communities.

UNSEEN

The theme of the Sydney Morning Herald in 2014, is the same theme. Yet what of our society at this same point in time, December 2014. Do we favour those who have this long history in our Community? Do we see a different future for them as we approach the 21st Century. As Federal Gov policy favours research, do we risk settling for the cheaper option, do we risk the repetition of the unforeseen consequences of the Richmond Report?

Research may well confirm that which many of us know. Models exist elsewhere in Australia and overseas – we create special community for those most in need. This is done in aged care, it is rarely grasped as possible in the modern era of adult mental health. We create demarcations based on false premises, believing discharge from hospital is the easy pathway to recovery. Many can tell us it is truly otherwise. The stress of modern life is caricatured in statements such as work – life balance. Stress for an adult with a mental health condition, often partially relieved, pregnant so often with disabilities which slowly improve or decline— their stress we can hardly imagine, in the world alongside us still. Often not part of the one community, kept separate. New approaches are needed.

ARCHITECTURE aids the recovery needed to restore the heart, mind and soul of a person suffering long term, short term or incidental mental illness. The architecture of special environments, supported by specialised carers. Yet the use of the Eastern campus by State & Local Governments with Urban Growth for those ready to pay, ready to settle in their own secluded peaceful setting with a rarely a thought in hindsight for those who live and work there now. Unlike the modern purchaser, these current Riverbank residents have no other option.

In 2014, Jan GOLEMBIEWSKI has told us so in his discussion of the phenomenology of the built environment and the beneficial impact on patients and staff.

Trees, bushes, quiet gentle buildings in full sight of a mind preoccupied with demon symptoms and hushed ambitions to leave hospital, this is recovery. Leave for where? "Community". Who defines community, and who is the gate-keeper?

Similarly, the gentle architecture of the natural environment, ought this be quarantined for those who can pay to live on a Riverbank, to own a palatial apartment, to ensure their work-life balance in the new Parramatta CBD? There is a lesser value on perpetuity in this Country than in other more relaxed and ambient societies overseas. It is not done this way at Uni. Western Sydney.

Their own community might be denied to those Australians who cannot afford more than a bed-sitter, no job, achieving few social successes and a long life of 'waiting lists'. The waiting list is a new engineering feat of the welfare society. The Non-Government sector could well supplant and complement the work of the specialised mental health workforce. It could yet replace the specialised practice and research hubs, needed for modern mental health care and workforce complements.

This workforce begins its career not in a hospital or clinic, the health workforce begins its career in a University, on a mental health placement in a specialised centre – Cumberland Hospital. Once upon a time the social capital invested in mental health services relied upon this workforce; likewise the Rozelle Hospital precinct and its dedicated workforce which fostered relations within a unique community not far from Central Sydney CBD. Likewise Gladesville Hospital, Rydalmere Hospital precinct and the specialised UNSEEN care - those who built relationships with adults afflicted, through no choice nor volition of their own. Identity was conferred in those communities. Privilege is conferred in communities envisaged by Urban Growth. Who will be the gatekeeper?

What of the commerce, Industry, Government Policy which promotes civil society, justice, human rights, the high end research in the Brain and Mind Research Institute on Hawkesbury Road, Westmead, a short stones throw from the Eastern Campus Riverbank. How does high end research in mental health translate without a specialised institution charged with promoting change, sustained ethical practice, duty of care where accountabilities are to Government agencies responsible for civil commitment. The shifting fortunes of the mental health service, are indeed the shifting fortunes of commerce. Is there a cost to Universities unable to blend and merge research and practice with in a co-located modern health service industry?

Where commerce dominates, the real cost is often placed on the mental health service system, or so some of us fear. The cost is to provide less specialisation, and more dislocation. There is a cost to the University workforce system. As the slow erosion of specialised services sees well-trained and practiced staff funnelled into services which are less costly, we slowly but insidiously create hidden problems of reduced competence, downgrading of skills, reduced confidence and reduction in care. Investment in mental health is first and foremost an investment in people, investment in people is investment in relationships, investment in relationships is contextualised into an environment. This

has been known, addressed, an architecture was built around this approach from the 19th Century onwards. This is the cultural community of mental health precincts. It exists now.

We believe what we seek to believe about mental health, rather than acquaint ourselves with generations of adults with these complex conditions. Many are successful. Many are artistic. Many succeed in spite of their illness.

Our duties could well be modelled differently co-opting the Urban Growth approach to North Parramatta, and shifting our values in favour of leadership in modern mental health. The size of the land in many respects is not that much to sacrifice for a benefit to society overall.

1. Beechworth in Victoria recognises the special historical and human beauty of retaining that which was architecture for human association. It remains. It Lives now, and attracts the aesthetic pleasure of the tourist.
2. Similarly, the precinct of Rozelle Hospital, Gladesville Hospital, the environs sprawling gracefully and with splendour around Parramatta, this is our BEECHWORTH.
3. The Values of North Parramatta however seem less in tune with the convenience and ambience of a Beechworth model, more inclined as the Urban Growth promotion would suggest, to offer the privilege of living in the North Parramatta precinct to those who can pay. Those who can Vote. Those who can prosper in a commercial and financial, social sense.

These are not the values which fostered an extensive history of mental health care early in the Colony of Australia.

Research requires strong institutions with skilled corps of professionals to rapidly adopt, scrutinise and deliver the best care to a population in need. This is happening in many fields of medicine and industry. It could happen in North Parramatta in Mental Health Services.

The Population of current, emerging and culturally different mental health consumers await better prospects in the early 21st Century.

This prospect seems daunted with the collaboration between Urban Growth, Local and State Government and the generous hand of a National Government, possibly far remote from the optima mens of the recovered person, a community member – a citizen of the wider community.

Overseas Models

There are fine examples overseas of developed modern services / adjoining existing and splendid previous models.

This is what we ought to be reconstructing in North Parramatta.

For example, the Broadmoor model in UK

For example, the CamH model in Toronto

For example, the special services in Gheel and Ghent in Belgium.

These ideas are possible with reference to the Architecture of Jan Golembiewski a local and international expert on the built environment, the architecture of the natural environment influencing the modern ethic of mental health design.

More can be achieved by a society which reflects on it's care of those in need. This type of wealth requires no particular monetary cost, as all members of the community benefit. The individual person who belongs in a family associated directly/indirectly with you, your workmates, your friends. The child with a disability, the older Australian with a new and rare dementia like Christine Bryden. The young person starting out at University who aspires to be a doctor, nurse, engineer. Little do they know that the first signs of their possibly life long condition, manifest as self doubt, questions never asked for fear they are in the grip of something they can't comprehend; the urge to be normal, without this 'fear', wanting to be with peers. Slowly the losses build, they change and fortunes change. These people experience some loss. Their personality emerges again when well, their humour returns. They are NOT different to me. They are NOT different to you. They see the world in ways the reader, the Urban Growth Committee, may never have to see themselves. The fear of mental illness is actually a fear of the unknown. This translates to a stigma. The Stigma of mental illness in the end, protects those who hide behind it.

Kindly, North Parramatta never hid behind the stigma of mental illness. Proudly North Parramatta stands similarly capable in the 21st C to optimise this commercial enterprise, to foster the research and practice, the University of the future generation, the institute of modern mental health care applied in a specialised community – the one we have yet to conceive of, to build and to urge ourselves to grasp with integrity. In this new Mental Health Enterprise, we all get to see a little of ourselves, with or without the interference of mental illness, we can all do something about mental health.

The challenge for Urban Growth is to invest in mental health. This need not be done with a shift of urban high –rise and exclusive entry to the eastern campus of the Parramatta River, a move which requires another community to depart.

This submission is not only a request to retain the goodwill of the past, but to learn and adapt this into a modern, unseen future of more complex multicultural and specialised care, the horizon of 21C. Mental health is now. Ideas yet remain SILENT too, until we ask and listen.

The River will endure. Mental illness will endure. The two are as connected now as they have ever been.

Commerce shifts.

This is the story of Urban Growth – the story of Commerce follows the trend.

And so in closing.

I learned the ART of mental health care, in the bush in Qld. There were no services, there were people. I came with what I had learned from psychiatry, I did what I could.

I continue to bring what I have learned from Psychiatry. It is an ART, as was said by a nurse today.

To forego the intelligence & opportunities of those who for no fault of their own, cannot enjoy the purchase of wealth, comfort, home and more – this would be a new shame upon this community. A shame we can bypass for the sake of those who built this country – those with mental illness. Together, those who cared and those who suffered added untold wealth and goodwill to this land.

What to do as an Urban Growth precinct like no other in Australia.

Lead.

Do not just conform.

Be a circuit breaker between the existing community and the temptation to overpower with exclusive Urban Growth.

University of Western Sydney's southern campus sites idly & productively at the shore of the Parramatta River. Green grass, grand buildings soften the vista. Students might enjoy. This too is how we use the Cumberland Reach of the Parramatta Riv. East for those with an illness.

Build into the community of Mental Health in Parramatta:

1. Urban Growth sponsors a CLUB in the existing buildings – Clubhouse Model from the 1970's USA is the Club we seek to build with Urban Growth ingenuity and innovation.
2. With Culturally and Linguistically diverse communities intensifying the mix in Sydney West, Urban Growth opens a Mental Health Language Centre in our existing matrix of buildings on East Campus.
3. With the likely demand for more CARERS to engage with the service system, looking after their family member, URBAN GROWTH and it's partners sponsor a Metropolitan Respite Centre for CARERS, in the existing buildings; conveniently located near the re-aligned Light Rail. Many carers do their unpaid job at home, in silence for 40 years, UNSEEN.
4. Only recently Cricket has been played on the nearby campus with young men experiencing their first, fifth or very long history of a mental health condition. Allow this to be their space. Local Sports Associations can sponsor and the Parramatta EELS might

adopt a mental health Cricket Team. Be lateral in sharing the products of this Parramatta Development. Lead and avoid the mistakes of the past.

5. Museums are cherished in Australia. Allow the Cumberland Museum with it's history of this special cultural community, dedicated to mental health innovation and progress to be part of the East Campus Precinct. No one owns a Museum, many contribute. Museum's are property of community, they educate and socialise the next generation.
6. Finally, allow Urban Growth to lead the community with confidence. Foster the Centre of Excellence in Consumer Based research. Link with the Returned Servicemen's groups and Veterans research projects, soon to be located at Aust. National University.
7. Parramatta Gaol. With the development of the Badgery's Creek Western Sydney develops modern ideas. Or it does not. The Gaol Precinct offers many opportunities for continued employment, commerce. A Convention Centre, a Multicultural Meeting Place. A shrine for the Indigenous peoples of this State. Many ideas would allow this Beautiful Architecture to arrest it's place, un-changed in its relationship with the river, yet brought gracefully into the 21st C.

Finally – lead the 21st Century built environment, not around buildings but in the first instance, build with people. Consider the lesson from Indigenous Land rights. People belong to space and land, commerce and industry has a passage through.

Signed: cke04663@bigpond.net.au

Parramatta Female Factory

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- Female Factory**
- Asylum
- Roman Catholic Orphan School
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The Female Factory at Parramatta was the first purpose built colonial establishment designed to provide accommodation and employment for convict women. It also functioned as a penitentiary and lying-in (maternity) hospital.

Other Female Factories were later located at

- Newcastle c1818 -48
- Moreton Bay 1829 -39
- Port Macquarie c1831- 42
- Bathurst 1833- 46
- George Town c1824 - 35
- Launceston 1834 - 46
- Old Hobart 1822 - 28
- Cascades 1828 - 51
- Anson Hulk 1843 - 49
- Brickfields Argyle St Hobart c1842
- Ross 1848 - 54



Female Factory main building. Photo courtesy of SAG

Matrons quarters Female Factory: photo courtesy T Smith

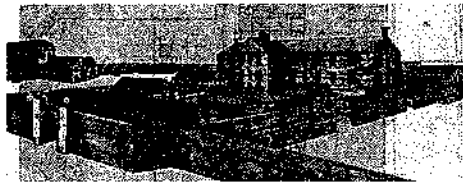
Parramatta Female Factory

Designed by emancipated convict, Francis Greenway the Female Factory was the destination of all unassigned convict women sent to the colony of New South Wales. It played an important role in the provision of medical care for the wider female population and was an assignment depot, refuge, workhouse, a marriage bureau, hospital and prison. This multiplicity of roles made it difficult to administer and it quickly evolved from a place of refuge to that of a prison.

The foundation stone was laid on 4 May 1818 by Governor Macquarie in the presence of builders, Msrs. Watkins and Payten, Chief Engineer Major George Druitt and convict work gangs. Building work was completed in early 1821 and on the 30 January 1821 the first women convicts were transferred from the nearby [Factory Above the Gaol](#).

In describing the Female Factory, Governor Macquarie wrote:

' A Large Commodious handsome stone built Barrack and Factory, three storeys high, with wings of one storey each for the accommodation and residence of 300 Female Convicts, with all the requisite Out-offices including Carding, Weaving and Loom Rooms, Work-shops, Stores for Wool, Flax, etc, etc..... for the Superintendent, and also a large kitchen garden for the use of the Female Convicts, and Bleaching Ground for Bleaching the Cloth and Linen Manufactured; the whole of the Building and said Grounds, consisting of about four acres, being enclosed with a high Stone Wall and Moat or Wet Ditch. ' Macquarie Letters 1822



The Female Factory was sometimes referred to as the 'Old Stone Jug' or 'Gordonville'.

Administration

The Female Factory was administered by a Board of Management made up of 'respectable men' who met every three months, with a Matron and Superintendent in charge of daily operations.

The first superintendent was Francis Oakes until July 1822. His successor William Tuckwell had a long association with the Factory firstly as superintendent, as storekeeper and at times as secretary. The first matron appointed was Elizabeth Fulloon (nee Raine) in April 1824 with her son John as administrator until October 1825. In October 1827 Ann Gordon replaced Fulloon as matron followed by Sarah Bell as matron and her husband Thomas as 'keeper'. In 1838 Mrs. Leach was appointed matron and Mr Clapham superintendent with his wife Agnes as 'instructor'.

Both Leach and Clapham were dismissed in late 1838 and the Bell's re-appointed until 1843 when they together with assistant matron Mrs Corcoran were suspended. For the next 5 months Mr and Mrs William Rogers held the positions of matron and storekeeper but proved unsatisfactory. George and Lucy Smyth were appointed to fill the administrative positions and lasted until 1847 followed by Elizabeth and Edwyn Statham who were the last to take up senior positions. The Stathams remained on when the Factory was proclaimed a lunatic asylum.

Assistant matrons appointed to the second and third class, were often soldier's wives with monitresses and other staff usually inmates.

Classification

Until 1826 women were distinguished as either the Merit Class or the Crime Class. This was refined to a Three class system with First class women eligible for assignment, a Second 'probationary' class and a Third class either on secondary punishment or serving time for offences committed while on assignment.

First and Second class women were employed in a range of tasks such as wool picking, cloth scouring, carding, weaving, laundry, oakum picking, needlework, cleaning duties and straw plaiting for which they received a small payment. Third class women were restricted to menial tasks and hard labour such as stone breaking and oakum picking.

Medical & Maternity Hospital

TWO FEET GRANDDAD JUST DISAPPEAR



OLD PHOTOS YOUR FAVOURITE PAGE IS BACK PAGE 96

After reading one of her grandfather Ross Smith's stories describing the terrifying feeling of invisibility he experienced with growing old Jordan Baker realised she was part of the problem.



A few weeks my grandfather celebrates his 94th birthday. You wouldn't know it to look at him. He's still six feet, scatheless, and fitter than men half his age. He laid bricks until he was 75 years old, and was hailed by more than one foreman as a bigger asset to the building site than 25 year olds, because he understood the meaning of hard work. He could treat the younger men at an arm's length without a trace of effort.

When he retired, he spent his days working. He became a familiar sight around Central Station, the tall old bloke in his tricker cap and knee-length navy shorts, who walked and walked and walked. He's slowed down a bit recently, there are a few niggles here and there, but he makes sure he still gets out every day.

When he's not at all tips of watching war movies, he's writing. There are 30 years' worth of stories to tell, about being raised by a struggling single mother, about his mercenary father, about his service in Papua New Guinea during World War II.

My grandmother has heard it all, so have his daughters and the people who should be listening, his grandchildren, are too busy with toddlers to watch, supermarkets to dash to work, to people.

So, staved off an audience he writes his stories down, in tiny, neat capitals over pages of festy cap paper.

The last time I listened, he showed me one about what it's like to be elderly. I know my grandfather has struggled with ageing, it's difficult for a man who was a toppling physical specimen most of his life to become decrepit, lose his health, and be offered a seat on the bus, or young women, but his one was a little different, it took me by surprise. It was about how being old makes you invisible. When he's sitting at Circular Quay watching the ferries, he wrote, he's never the one approached to take a photograph for a tourist, even though he knows how to use an iPhone. They just assume he can't do it, or won't be able to hear them.

He's never chatted to by the clubby water, he's never drawn into conversations at the pub, and the only time anyone talks to him on public transport is to ask if he's OK.

About 10 years ago he embarked on his dream trip a drive around Australia. He didn't want to fight out with the others, all over the caravan parks. He wanted to talk to younger people, people whose age he felt closer to in spirit, at the local pubs and B&Bs. He'd strike up conversations, but no one was interested in talking to him. He ended up circumnavigating the country in two weeks flat.

"You are walking along George St, Sydney," he says, when I ask him to tell me more about what it's like to grow old. "There are people passing out pamphlets. They never give one to me.

"I'm too old a person, they don't want me to buy what they are selling or go to the place they are advertising. I have a thing handed to me for four or five years."

When you're old, he says, you disappear.

When my grandpa was a kid, grand-

children would have been treated very differently. In those days history was recorded in books at the library, and younger people could read or write, so knowledge about the world and what had passed came from those who experienced it.

Kids learned about the Liber War and World War II from men who'd fought in them. They learned about the women who perfected them over generations, and about foreign countries from people who'd been to them. They learned their family history from those who could remember.



The author's parents Joan and Ross Smith.



Jordan Baker with her grandfather Ross Smith.

clothes in a boiler and vials from the sea train.

She died when I was at my 20s, and she was in her 30s. I don't know where that tape went, I think I used it to record the top 40 off the radio.

I taped my grandfather and my mother for that project too, and recorded over them both. It's only due to my grandfather's foresight that there's still a copy of what I needed in, complete with a comment from the history teacher urging me to keep these recordings for posterity.

You'd think I'd have learned my lesson. I have never taped my grandfather, or gone back to interview my grandfather, even though I interview dozens of strangers every week. It's partly because I can't bear the thought they will one day no longer be there to talk to. But it's also because I haven't made the effort.

Life's busy. I have an 18-month-old, and there's something I have to seem to have. Ectests, however, I have in abundance.

But my grandparents are precious, and I am going to make the time to listen to them talk about their lives.

I want their knowledge, so I can share it with my own children. But I don't want to be one of the people responsible for making them feel invisible when I owe them so much more.

Helping to win World War II nearly killed me

A SOLDIER'S TALE
ROSS SMITH

I HEARD the bugle call at age 18, and decided then and there to do my bit. Being on defence work, I was exempt from joining services so I had to ask my boss. He called the army, and asked if they wanted me.

Not being deaf at the time I heard me say over the phone, "Is he big enough to carry a machinegun?" After a short pause at the my employer replied, "He's big enough to carry two machineguns."

Within 24 hours I was in uniform. Private Smith, 88, regimental number NX176890 (a good soldier never forgets his regimental number).

I was stationed near Kaituma in Papua New Guinea.

Our drinking water was never fresh

are you know it. It was brackish — half soft and half fresh — you would bleed, sweat spew when you drank it. But of course you had no choice.

We had to go some time a week or more without a wash or even taking of your boots to change your socks. If you took them off they were that covered in mud you would have had trouble putting them back on again.

There were no little streams or brooks up in the ridges, there was only starchy rice, moose, sweet, mild, fat richly, deep, salt, corn and Japs.

If there was something that we all feared the most it was the enemy's 4.2 mortars. The first warning you had was a little 'putt' in your close proximity, and then this appalling ro-bling of air just prior to the shell exploding with a deafening roar.

There was something else that was

probably on a par with the mortar and that, of course, was the machine gun, especially when it was set up at the end of a long track. They would not shoot the first man to appear, they would wait for the whole platoon to be lined up behind each other then they would open up on you.

Nobody liked long tracks.

After spending some weeks up in the ridges our company was relieved to the coastal area of Tel Plantation.

During the time we had spent away from the Herby-Red River, the managers had built a bridge across it.

The Red Cross was there with a hot meal for us (you bet). The first hot meal we had had for about three months, but I'm afraid to say my joy was soon cut short. One of my best friends, Stewart, was sent across the

bridge to bring back a hot meal for us in two big Dixies (pots). We all heard this Jap Zero coming over our heads. Next minute you heard this huge threatening crashing of air. Stewart would have heard it, too. We all hit the ground except Siewy. Being more exposed than the rest of us he decided to run.

The Jap, of course, was after the bridge. I have only heard one big bomb like this one and I don't want to hear another.

The explosion was enough to split your eardrums and it could well have contributed to my deafness.

The Jap Zero missed the bridge but he got Stewart.

They covered up his mangled body with a ground sheet.

When I saw what was left of him I cried like a baby.



Ross Smith's helmet from World War II.

"My dad has bipolar. It's put my family through hell, but we're so proud of how far he's come"

Richard Pittas, 39, gives a raw and honest account of life with his father, Cristiano, 51, who suffers from bipolar and depression

There was a time in our house when every dinner would turn into World War III. This one is the most memorable. We were sitting at the table - me, my mum, Patrice, my dad, Cristiano, and my sister, Michaela. I was 14. I picked up my fork to eat and it accidentally slipped out of my hand and landed loudly on the linoleum floor below. Everyone went silent, then Dad screamed: "You're so ungrateful! You're so careless with my things!"

The tears started to roll uncontrollably down my face. I tried my best to hide them because I'm sure, I know I'd be told to "grow up, act my age and take responsibility for my inconsiderate actions". Dad then got up and stormed up the stairs. At the time, I thought I'd done nothing wrong, but then Mum gave us a talk - a talk where my sister and I learnt that Dad was dealing with things that were "too hard for us to understand".

My dad has bipolar disorder. Call it what you want: mental illness, a mental disorder or a medical condition - it doesn't matter, because for the person who has the condition, it's for life, and for their family it can be like living a nightmare.

Bipolar is medically known as bipolar affective disorder, manic-depressive illness, or affective psychosis. In a nutshell, it's experiencing extreme mood swings, which can last anywhere from an hour to a year. Patients can have extreme highs and become abnormally happy, energetic, or irritable. They often make poorly thought-out decisions with little regard to the consequences. At the other end of the spectrum, patients can become depressed and start crying, give poor eye contact, and project a negative outlook on life. My dad has type II of the disorder, in which sufferers can experience episodes of mania and depression but not the psychotic episodes that occur in type I.

He was first diagnosed in 2009, after he was admitted to a psychiatric clinic in Sydney for three weeks. We were told he'd be going away for a while - he went on business trips a lot so I assumed it

was to do with that, but apparently he'd contemplated suicide and been treated for depression for several months. Then the clinic told him he has bipolar disorder.

At first, my parents kept Dad's condition a secret. Mum says: "While he was in the clinic, I had to run the house on my own, work full time, handle two children and keep his treatment and three-week departure hidden from all of our friends and family."

She remembers visiting friends the night Dad got discharged and revealing the news for the first time. "It wasn't hard for them to take in - they'd seen his outbursts over many years and the way he'd just snap," she says now. "They were incredibly supportive, and continue to be."

Mum and Dad only told friends and family when they felt comfortable that Dad was both strong enough to live with them knowing, and had made enough progress to talk about it freely. It's never the easiest thing in the world to talk about but every time you discuss it, it gets easier and becomes less of a touchy subject.

Treating and managing bipolar disorder is an intense situation. The two main forms of treatments are medication (mood stabilisers) and therapy (usually psychotherapy or cognitive behavioural therapy), both of which are expensive and not always effective. My dad tried both

from what I can remember, medication made him worse. But thankfully, therapy has really helped. He's been seeing a psychologist for just over a year now.

My sister and I often ask Mum, "Why haven't you just walked out?" We've never gotten an answer, she often just laughs it off, thinking we're joking. My mum is strong. She has to be to put up with everything.

She often refers to the first date she and Dad ever went on, 28 years ago. They were at a coffee shop and had sat down and ordered. They waited for their coffees. And waited some more. Then Dad got up and stormed out: he'd had enough of waiting.

"Thinking about it now, that's came for him. I remember when a coffee he received once was so bad he walked behind the counter and remade it himself. It was hilarious at the time but it certainly wasn't a "normal" customer reaction.

Mum is strong, but I think Dad is stronger: after all, he can't escape it - the rest of us can walk off and slam doors but his battle is an internal (and external) one.

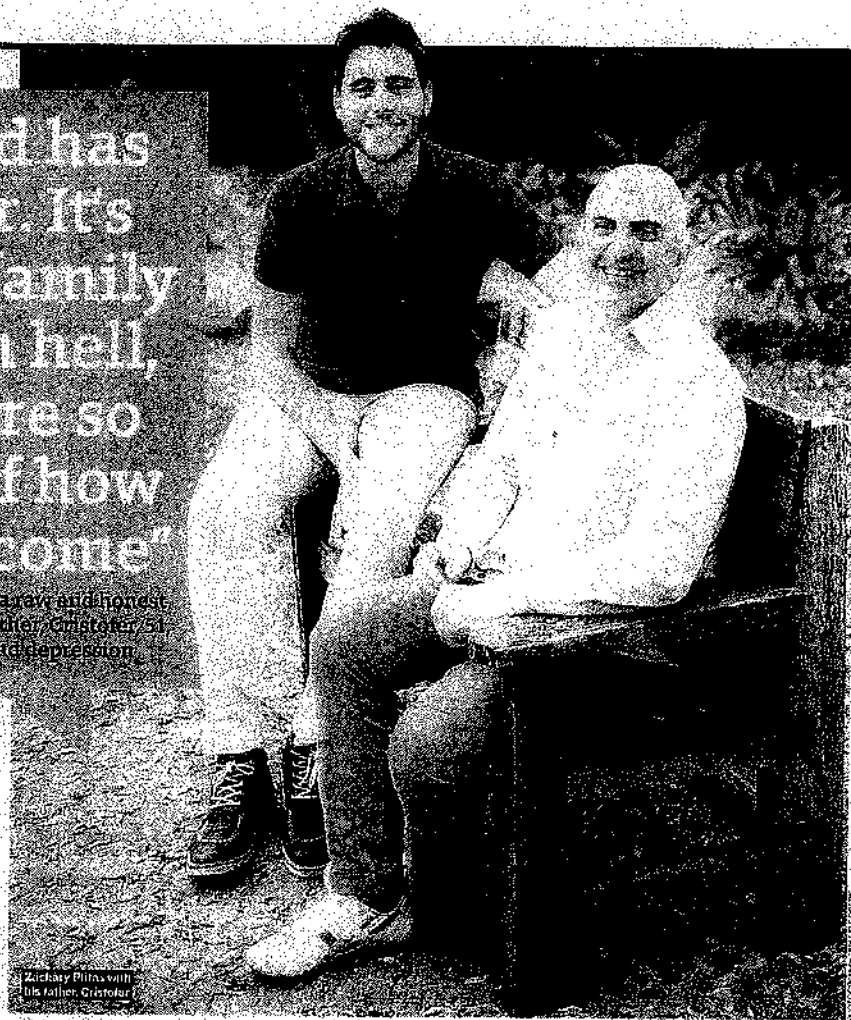
I don't want to spend my entire life feuding with Dad. Sure, it gets really hard sometimes but I have to remind myself of what he means to me in the big scheme of things. My dad has come so far in the past five years - just a few weeks ago we had a miscommunication at dinner over a

bottle of sparkling water. He'd put one in the freezer, but I didn't know and used one from the cupboard. In the past that would have caused him to storm off, but he saw our worried faces and simply said, "Guys, it's not even a big deal... We'll drink it tomorrow."

I was so shocked that he brushed it off and it just made me appreciate how much progress he's made. The last time we had an argument over dinner that resulted in us all leaving the table was... I can't even remember, and that itself is a huge deal to our family.

I'm proud of my dad. Without him I wouldn't have someone to laugh with about boy stuff or someone to teach me how to look after my car. He always knows how to make me feel better when I'm upset and I love how we have a connection that's so different to his with my sister. Whenever he has a function to go to where he wants to put some form of effort into the way he dresses, he'll come to my room and say, "Do you want to pick out a shirt for me to wear?" It always makes me smile that he values my opinion, not only in his fashion choices but in all aspects of life.

When I think about all of this, I can accept his past aggressiveness and will wait for him to jump the next hurdle in his path to leading a calmer life.



Richard Pittas with his father, Cristiano

A kiss of life for suburbs

Goward plans to revive high streets



Jennifer Burbaud and Anton Cabasson love to shop in Mosman, a high street development touted as a model for Western Sydney. Picture: Richard Dobson

EXCLUSIVE

ALICIA WOOD

TAKING stores out of shopping centres and putting them back on the high street will be a central plank in the state government's metropolitan strategy.

Other central aims of the strategy, released by Planning Minister Pru Goward today, include building high-rise schools and elevating Parramatta to the same status as Sydney CBD.

It includes creating 8000 new jobs, a \$30 million investment in roads and a plan to revitalise more than two dozen Sydney suburbs.

Ms Goward said the 28 "strategic centres", which include Blacktown, Liverpool, Sydney Olympic Park and Hornsby, will see increased street malls.

"This is a Sydney suburb revival, recreating days where people lived, worked and shopped locally," Ms Goward said. "By working

with councils and communities to make more room for offices we will create suburban shopping areas that are alive with activity."

Campbelltown has been elevated to a strategic centre in the plan, meaning that the state government will investigate where new jobs and housing can be added.

"It is a well-deserved recognition of how important the area is to Sydney's success, bringing renewed focus, jobs, homes, shops and restaurants to the areas," Ms Goward said.

"Campbelltown's significance will grow with ongoing work in and around Badgerys Creek airport, making Campbelltown an obvious centre for jobs and homes in a growing Sydney."

The government will also look at "the efficiency of delivering new infrastructure such as multi-storey schools in dense urban communities".

Raising Parramatta to the same status as Sydney CBD will mean planning for how

to boost job numbers, transport links and amenities.

"Parramatta will be the driving force behind Sydney's seismic shift to the west. Parramatta's CBD will be elevated to match Sydney's CBD with an injection of homes, jobs and world-class entertainment, restaurants and shopping," Ms Goward said.

"The Plan for Growing Sydney will shift the city's centre of gravity from the east to the west, firmly establishing Parramatta as a major CBD alongside Sydney."

To begin with, Parramatta will be the location of the first "green grid" pilot, where parklands and open spaces are linked by cycle and walkways and the city will be separated into health, arts and education districts.

The Westmead health precinct will be expanded under the plan and higher education providers will be encouraged to develop Rydalmere as the key western Sydney university district.



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Dementia patient Christine Bryden continues to baffle doctors 20 years after diagnosis

Australian Story By Greg Hassall

Updated Tue 1 Jul 2014, 10:52am

After being diagnosed with dementia nearly 20 years ago, Christine Bryden continues to baffle doctors as she battles the disease.

To receive a diagnosis of dementia is devastating for anyone, but when you are in the prime of your life it is particularly cruel.

Ms Bryden was 46 and at the peak of her career as a government adviser on science when she saw a doctor about her crippling migraines.



PHOTO: Christine Bryden says the effort required for her to function relatively normally takes a huge toll. (Supplied: Christine Bryden)

RELATED STORY: Dementia supplement payment cut after budget blow-out

MAP: Australia

Diagnosed with Alzheimer's disease, she was told to leave her job immediately and to prepare to be incapacitated within five years. A second doctor confirmed the diagnosis.

"I can't describe how you feel at that moment," Ms Bryden told the ABC's Australian Story program.

"You're so traumatised. You're 46, you're a divorced mother of three young girls and you get told that you've got something like this and there's no cure."

That was in 1995. Nearly 20 years later, Ms Bryden has defied even the most optimistic prognoses.

She has written two books about her experiences and is working on a third,

completed a post-graduate diploma, and is enjoying her 15th year of marriage to the man she met after she was diagnosed.

She also presents lectures around the world and has become a celebrity in Japan, where dementia is a huge social issue.

No-one there had heard someone with dementia talk publicly about their experience before and it caused a sensation. Her first television interview drew more than 10 million viewers.

"If someone looked at Christine's brain scan you would expect to see someone who was very impaired," said Professor John Hodges, from Neuroscience Research Australia.

"Christine is one of these puzzling cases of dementia that we don't really understand.

"I can't think of someone I've seen quite like her. I think she's remarkable."

I can't think of someone I've seen quite like [Christine]. I think she's remarkable.

Professor John Hodges

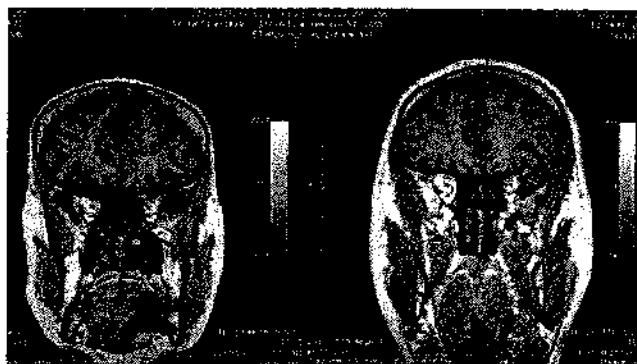


PHOTO: A scan of Christine Bryden's brain (L) compared to a healthy brain. (Supplied)

Dementia progress slow but significant

Dementia is not a specific disease. Rather it is the term used to describe a range of symptoms, including confusion, loss of memory, personality changes and an inability to perform everyday tasks.

It is not an inevitable result of ageing, although it is more common in those over 65.

Although Ms Bryden's decline has been remarkably slow it is nonetheless significant.

"Most days I feel like I'm clinging to the precipice with my fingernails," she said.

"I like the analogy of the swan. I'm gliding along and hopefully everybody sees this very normal person but underneath I'm paddling as fast as I can to stay afloat.

"There's a real sense of living only in the now because all I have is now.

"If someone says to me, 'Oh, we're going to do something in two hours' time', I don't have a sense of two hours."

Christine's eldest daughter, Ianthe Boden, says her mother's present condition must be seen in context.

"It's hard to explain to people how brilliant my mother was," Ms Boden said.

"People who know her now have said, 'You look OK, you sound fine, you can still do all of these things. Are you sure you have dementia or could it be something else?'

"That's just because people haven't experienced the brilliance of [my mother] beforehand."

Early warning signs of dementia



We all forget things from time to time, but dementia is much more than memory loss. ABC Health & Wellbeing looks at ten warning signs.

Election looms so what happens now about an arts precinct for North Parramatta?



caption as the Premier announces the \$24 million arts precinct.

"What a great day for Parramatta - and for the arts in western Sydney - A very important piece of cultural infrastructure has been secured and I congratulate all of the artists that made this happen."

Director of Carriageworks, Lisa Havilah, was speaking at the launch of Tom Polo's exhibition, at Parramatta Artists Studios, March 4, 2011. The day before, NSW Premier Kristina Keneally announced the long-awaited arts hub for the Old King's School site in Parramatta. It was her last pitch to western Sydney before the state government went into caretaker mode before the March election. Above, *Parramatta Advertiser's* photo and

It was the climax of at least 30 years of intense lobbying for arts facilities and a culmination of *Parramatta Council's Arts and Cultural Plan (2000)* and *Arts Facilities and Cultural Places Framework (2005)*. Among the Framework's objectives was - "to consolidate and build on partnerships with the State Government in the current investments in Parramatta by investing in new arts facilities to keep pace with the anticipated growth of Greater Metropolitan Sydney." The framework outlined three cluster venues for arts facilities - first, in the city centre, second, at the adjacent Old King's School site where education, visual arts and dance would be pursued, and third, for the longer term, the North Parramatta Cumberland Hospital site.



As the first step in this process, Parramatta Artists Studios officially opened in the heart of the city in April 2007. Non-residential and residential studio spaces were offered to emerging and established professional contemporary arts and crafts practitioners. The response was sustained and enthusiastic. Almost immediately, many began to campaign for the Old King's School. They knew that sitting and waiting was not an option. The



announcement by Premier Keneally was a triumph after years of preparation.

In the photos, banners announce the Western Sydney Arts and Education Precinct on the walls of the Old Kings School.

Then the 2011 election was held, the Labor government was swept from power and replaced by the Liberal/National Party government under the leadership of Premier Barry O'Farrell. In June 2011, the new Coalition Government said that "funding was not there" and in July the

premier, who was also the minister for western Sydney, was saying the whole project was "under review". On August 11, 2011, under the headline *Funding furore dogs arts issue*, *Parramatta Advertiser* editorialised "There cannot be a more vexed issue in Parramatta at the moment than the mooted arts precinct on the Old King's School site. The arts precinct seemingly promised by the previous state government, has become a political football, with both sides accusing each other of lack of action."

In the same issue, Di Bartok reported that despite claims by the O'Farrell Government that an arts precinct for the Old King's School site was a "five minutes to midnight" announcement, the previous government had commissioned a *Business Case and Economic Appraisal* report. The 2010 report was a blueprint for an education and creative industry precinct - "a landmark development for western Sydney, involving the establishment of a gallery outside of the Sydney CBD and multi-media facilities and programs to support creative industry growth in the region." It was claimed that more than \$10 million of the \$24.6 million project was already available.

Uncertainty hovered. Artists and supporters pounded the new state member for Parramatta, Dr Geoff Lee, with demands for the Old King's School. Some set up a Facebook site [Urgent - Save The Old King's School](#). More than a year went by. For those who had fought for years in the centre of the campaign, energy waned. Their commitment remained but they needed to continue with their own creative production rather than waste time banging their heads against a brick wall. [Parramatta Artists Studios](#) continued with a busy schedule which included providing resources and facilities for artists, supporting city events and festivals, presenting forums and offering workshops for children and adults.



Parramatta Advertiser. August 3, 2011, reported artists in a street rally to keep the Old King's School in public hands for use as an arts precinct.

Then in November 2013, members of the arts and heritage protection communities were invited to state government organised workshops about what had now become a Parramatta North Framework Masterplan. Financial viability was the fundamental consideration for a 146 hectare site that included some of Parramatta's most sensitive heritage sites including the Old King's School, the Parramatta Female Factory and Parramatta Girls Training School. The response from participants was cautious optimism that recognised the need for private development to fund the adaptive re-use of historic buildings for arts and commemorative purposes. More consultations were promised.

"The concentrated consultation approach was designed to deliver a fast-paced saturation-style of communication and engagement activities. The approach was prepared to trigger constructive stakeholder conversations about urban renewal on the unique Parramatta North site, as well as inviting new community voices to be part of the consultation, ahead of rezoning application lodgement with the Department of Planning and Environment in September 2014." wrote the communication consultants, page 5 of their [report](#).

Such a rapid consultation process with only short notice of each stage is fine if you are a developer, whose business is to identify opportunity, but if you are an artist or community member with many other professional commitments, participation is a daunting challenge. A check of the sites for [UrbanGrowth NSW](#) and [Department of Planning and Environment](#) reveals little evidence of arts centre planning. National Trust NSW and Parramatta Female Factory Precinct Memory Project & Parragirls have already registered strong protests about the heritage outcomes of proposals to date and asked for an extension of time to February 27 for submissions - see previous blog posts.

Another election looms, so what happens now about an arts precinct for North Parramatta?

Blog post, 12 January, 2015 - <http://westsydneyfront.wordpress.com/>

Emma Hitchens

From: Laurie, Craig <Craig.Laurie@ato.gov.au>
Sent: Tuesday, 6 January 2015 5:27 PM
To: Parramatta North Project
Cc: Amisone Lele; amisone_sunshine@hotmail.com; claurie100@gmail.com
Subject: Formal submission on North Parramatta Potential State Significant site plans [SEC=UNCLASSIFIED]

Good afternoon

Re: Parramatta North State Significant site proposal.

We are hoping that we can submit this formal submission late? I believe that the timeline for submission was extended from 19th December 2014 to yesterday, Monday 5th January 2015; so hopefully this submission is treated can be treated as only one day late?

We have been overseas on holiday having recently returned and have only just become fully aware of the urban plans for renewal for the North Parramatta precinct.

We have reviewed the summary document only and briefly looked at the traffic appendix document. Having been a resident of North Parramatta between 1981-1999 and then again since 2011 I am very familiar with the streets around the planned development and feel well placed to make comments about traffic. We live in the North Parramatta conservation zone at 5 Harold Street, Parramatta (one block east of O'Connell Street).

General feedback

- * Generally the plans for rejuvenation of the area are good and well overdue.
- * Most of the heritage conversation seems to have been planned sensitively; well thought through renewal of heritage items obviously costs money so this needs to be offset by sensitive commercial and/or residential development.
- * We believe that the height of at least two of the planned residential towers along O'Connell St is beyond excessive and there has been no consideration of the winter overshadowing that would directly affect the North Parramatta Conservation Zone bordered by Albert / O'Connell / Villiers and Grose Streets.

Traffic management feedback

- * We note that intersections along Church Street are to be upgraded and lanes added to Church Street between Grose St and Barney/Broad St. This seems well founded and is probably needed now; peak traffic on Church Street today is significant. The planned north bound signals at the Broad St/Church St intersection are needed already.
- * O'Connell St and Dunlop St is planned to get a roundabout. Already that intersection can bank up in the afternoon or when an event is on at the nearby stadium. With the planned redevelopment it should be traffic lights or at the minimum a 2 lane roundabout. Has consideration been given to the extra traffic caused by the upgraded stadium (upgraded to 23k seats or possibly a 45k seat new stadium?).
- * We note from the traffic management plan that councils' preference is for traffic lights at the intersection of O'Connell Street and Fennell. The preference of the RMS is to upgrade this to a 2 lane roundabout. This is already a very dangerous intersection with significant traffic and turning traffic. We have seen a car on its roof once already from an accident at this intersection. It definitely needs upgrading now and should be traffic lights.
- * In general O'Connell St carries a lot of traffic already. There are no existing roundabouts on it and the existing traffic volumes as they are would seem inappropriate for roundabouts. Any intersection upgrade along O'Connell St should involve traffic light installation.

Urban renewal plans

In general, we are very supportive of the overall plan - the following is only what we specifically object to:

- * What happened to the Parramatta Swimming Centre? Replacing it with 4-6 level mainly commercial towers seems ludicrous.
- * We note the plans to develop a residential precinct in the northern half of the existing gaol between Barney and Broad St. The buildings within seem newer and probably of no heritage value but the site is bordered by the existing sandstone gaol wall. Is the wall to be demolished? If so, we'd object to that on heritage grounds.
- * There is an existing DA with Parramatta Council for a three level social housing complex, comprising around 130 units, fronting O'Connell Street between Fennell and Albert Street. This seems very reasonable but has been replaced under this plan by various towers between 6 and 30 stories high. I could find no mention of social housing in the plans at all which is very objectionable. What happened to mixed use housing developments where those from lower socio-economic backgrounds are accommodated?

Building heights:

- * We specifically object to the 30 level tower planned for the corner of Albert Street and O'Connell Street and the 18 level tower planned for Harold and O'Connell St. There appears to be no consideration at all given to the overshadowing this will cause for the North Parramatta Conservation Area bordered by Albert / O'Connell / Villiers and Grose Streets. The winter shadow analysis presented on pages 64 and 65 of the overview document has most of the existing conservation precinct overshadowed from 1pm onwards - particularly the areas bordered by Albert / Villiers / Fennell Street. The 30 level tower in particular is too tall for that location and will cause significant overshadowing.
- * We object to the two x 20 level towers planned that front Harold and Fennell Streets for the same overshadowing reasons detailed above.
- * The 24 level tower planned for O'Connell and Factory St would probably add to the overshadowing issue for some local residents.
- * The planned 30 level tower for Broad/O'Connell seems too high for that site and would likewise overshadow properties east of O'Connell St. The planned 4 story towers either side could be increased to offset this.

Perhaps consideration could be given to limiting tower heights to 10-12 stories for any residential tower fronting O'Connell Street, and that these towers be set back further from the Western side of O'Connell street frontage. This could be somewhat offset by increasing other planned towers across the precinct by 1-2 levels across the board and therefore presumably accommodating the feasibility of the overall development plans.

Thanks for your consideration and happy to be contacted to discuss in further detail.

Regards,

Amisone Lele and Craig Laurie
5 Harold Street, Parramatta

0415 184 342 - Amisone
0468 649 301 - Craig

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Emma Hitchens

From: Maria Llave <llavemaria82@gmail.com>
Sent: Saturday, 20 December 2014 12:07 PM
To: information-Planning; brettpnur@gmail.com; parramatta@parliament.nsw.gov.au

Dear Sir/Madam,

I'm not in favour of high-rise residential buildings in the area surrounding my abode. I believe this would affect the value of the adjacent properties.

There should be more time to consider this proposal - discussing the pros and cons ASAP.

Thanks and have a lovely day,

Cheers,

Maria Llave

Unit 12, No. 11 Albert Street, North Parramatta 2151

042 111 7712

Louise Mansfield

From: Andrew Love <andrewjlove@hotmail.com>
Sent: Thursday, 9 April 2015 3:54 PM
To: information-Planning
Subject: Attn: Anna Johnston

I am writing with a submission regarding the “Parramatta North” urban renewal proposal. Please note that I am completely opposed to the whole draft concept and request it be shelved.

This is a site of National Heritage significance as well as being a sacred site.

I am opposed to allowing public land to be sectioned for private use. Selling units and using the sites rich open space filled with buildings of Historical beauty as a selling point sickens me.

Why bother with Section 94 contributions or Planning Reform fees (“Plan 1st”) for all these past years only to see existing open space be sold for residential unit blocks.

Please put aside these foolish plans and go back to the drawing board. There are enough dreadful buildings in Parramatta to make this option unviable. As it is, the foreshores of Parramatta River are being ‘Shanghaied’ as a selling point for developers. Consider Breakfast point, Cabarita and Rhodes where areas may as well be gated communities. Meriton has taken upon itself to use the foreshore at Lennox Bridge as its own backyard.

I’m sorry, but a bad idea is nothing more than just that.

I also ask that you also remove all ‘artists impressions’ from your documents. These are tantamount to misleading the public and may lead to future litigation.

Thankyou.

Andrew Love
North Parramatta



Our ref: 03.14.08
16 December 2014

UrbanGrowth NSW
GPO box 237
PARRAMATTA NSW 2124

Parramatta North urban renewal area

It is disappointing to note yet another urban renewal project of the NSW Government that does not include a component of affordable housing.

The Parramatta North site involves 146 hectares of government-owned land and the planning proposal includes the development of some 4,100 new dwellings with buildings ranging from 3 to 30 storeys.

There was some, cursory consideration of affordable housing in the planning proposal prepared by SJB Planning, 'Parramatta North urban renewal: draft state environmental planning policy PNUR) 2014 — planning report' (12 November 2014). They noted that Parramatta City Council seeks to maintain the proportion of available affordable housing in Parramatta City at 8 percent of the available housing stock and that the Council seeks to support investment in new affordable housing. Notwithstanding those aspirations of the Council, the planning proposal does not propose a component of affordable housing as part of the renewal project 'at this stage'. The reason given for rejection is that the site is subject to heritage constraints that will require significant capital expenditure, and additional financial burdens cannot be supported by the project (p.35). We are obviously not privy to the costings for the project.

However, it is somewhat ironic that, a few weeks after the planning proposal went on public exhibition, the Government released its strategy for metropolitan Sydney, *A plan for growing Sydney* (December 2014), which says: 'The Government will: ... provide affordable housing in Government-led urban renewal projects and on Government-owned sites to meet the shortfall in affordable housing ...' (Action 2.3.3, p.77). This commitment stands out as the *sole* mechanism in the Plan that could definitely deliver more affordable-rental housing in the metropolitan area. And yet we see, in this planning proposal for Parramatta North, a government initiative — exactly of the type envisaged by the Plan, a Plan which was presumably prepared with knowledge of UrbanGrowth NSW's workplan (given the long gestation of the Plan) — that does not reflect the commitment given in the Plan.

We support the planning proposal's to properly and genuinely protect and promote *heritage* values in the precinct. At the same time, and certainly no less important, is our view that the state government should promote social mix, through affordable housing, in urban renewal initiatives that involve increased dwelling densities — and hence generate a capital-value uplift. Specifically, we recommend a requirement in all state-government initiated urban renewal projects for 15 percent of new dwellings in those areas to be affordable housing. This will ensure that lower-income households have access to the benefits that are expected to come from higher densities. It will contribute to greater social mix, countering the polarization of our towns and cities by wealth and income.

Unless this sort of direction comes from state government, it is likely that the higher-density housing in urban renewal areas will benefit higher-income households rather than lower-income households, and investors rather than lower-income renters. In short, we recommend that UrbanGrowth NSW align its project plan with Action 2.3.3 of *A plan for growing Sydney*, and in particular — rather than a zero component of affordable housing — it include a 15 percent component.

Sincerely

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

Mary Perkins
Executive Officer

5 January 2015

Ms Carolyn McNally
Secretary
Department of Planning & Environment
23 - 33 Bridge Street
Sydney NSW 2000

Dear Ms. McNally,

Parramatta North Urban Renewal Transformation Project

Proposed changes to *Parramatta Local Environmental Plan 2011*, *Parramatta City Centre Local Environmental Plan 2007* & *Parramatta Development Control Plan 2011*.

The exceptional heritage site of the Study Area has been a gathering place for the Darug people for thousands of years, and stands witness to the historical development and progression of our modern nation from its colonial beginnings in 1788. Few other sites in Australia have seen nearly 200 years of “continuous institutional use since the construction of the Female Factory in 1818” (Draft SEPP (PNUR) 2014, p. 30), a use that reflects our changing attitudes to the welfare system, incarceration, mental health, and our social and moral values, particularly in relation to women and children.

In relation to revitalisation of the Study Area, the community is offered a “once in a lifetime opportunity to show Parramatta as an exemplar of heritage” (Member for Parramatta, Dr. Geoff Lee, as quoted in the Consultation Outcomes Report [COR] (p.17). As a nationally significant site, if not internationally significant, I believe that leadership, process and planning related to its future requires a principled, world’s best practice approach.

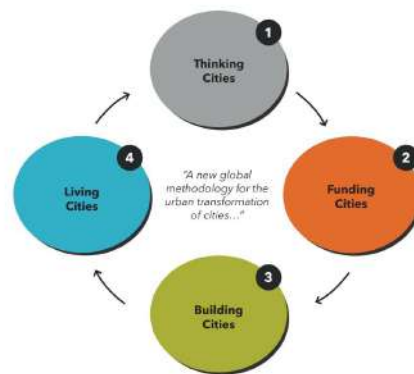
Not having had an opportunity to participate in community consultation, I have read the documents filed by UrbanGrowth NSW and am pleased to outline my concerns.

Summary of Concerns

1. The sale of public land and consequent residential and commercial development of the Study Area lacks sufficient rationale, particularly in light of the significant opportunities for rezoning and redevelopment elsewhere in the Parramatta LGA and Metropolitan West Central & North West Subregion.
2. UrbanGrowth NSW appears to have focused on fast-tracking a pre-determined scheme of residential and commercial development without fully exploring all options for sustainable preservation of this valuable community asset.

3. Stakeholder charrettes appear to have been steered towards obtaining acceptance of key industry development concerns such as de-risking the land and providing planning certainty (COR Appendix O), while not addressing wider stakeholder concerns.
4. The range of stakeholders engaged in consultation prior to this proposal appears to have lacked the diversity, breadth and independence appropriate to the national significance of the Study Area.
5. Documents such as the Draft Amendment to Parramatta Development Control Plan 2011 (DCP) are detailed in relation to built form and height, however, no such detail is provided in relation to the ownership, management and adaptive re-use envisaged for the heritage buildings.
6. Overall, UrbanGrowth does not appear to have followed its City Transformation Life Cycle™ described as “a new global methodology for the urban transformation of cities.”¹

UrbanGrowth NSW: City Transformation Life Cycle™



The above concerns will now be dealt with in more depth.

A. UrbanGrowth does not appear to have followed its City Transformation Life Cycle™ (The Cycle)

At the outset, it would appear that this project has either not benefited from application of The Cycle or its application has been truncated to such an extent that the process is unrecognisable.

Unlike the Stakeholder Briefing Presentation for the Bays Precinct, another UrbanGrowth NSW project currently underway, there is no mention in the Draft SEPP (PNUR) 2014, or associated documents, of the **City Transformation Life Cycle™** nor evidence of its application to the planning process.

On the 19th December 2014, Minister for Planning Ms Pru Goward declared that

¹ (UrbanGrowth NSW <http://www.urbangrowthnsw.com.au/about-us/our-approach.aspx>)

“...the public good must be front and centre” when announcing the formalisation of the **Statement of Principles** generated for the Bays Precinct Renewal Project following an International Summit in November 2014. There is no such tailored Statement for this nationally significant heritage site. These omissions support the view that the NSW Government and UrbanGrowth NSW do not consider this site as having the significance that it purports to extol in its proposal documents and are applying its methodology in a rather ad hoc traditional fashion.

The matter of principles was raised by Bryan Powyer of the National Trust when discussing the “trade off” between preservation of heritage versus development and asked that this concept needed to be “transparent and principled”. The project team response was that “the model has been guided closely by principles –and these principles were shaped and built upon the Charrette part two” (COR, Annexure N, p.4) that outlines topics: “Designing Great Places”, “heritage significance ratings” and “exploring design scenarios” (COR, Annexure I) There is no Statement of Principles. Nor are guiding principles specifically mentioned in the summary provided in Annexure K (COR).

The non-contemporaneous Executive Summary of COR seeks to incorporate “devised principles to guide urban renewal” (COR, p. 6) for the Study Area. Examples of the stated principles are “height and scale”, “well serviced village heart” “public walkway” and “activation of heritage features”. The DCP 2011 also lists “Principles for Development of the PNUR” (4.3.5.2) as Narrative and Legacy, Connectivity, Community and Amenity, Vitality and Activation. These would all appear to be objectives and desired outcomes of the project as opposed to guiding principles set in order to develop good outcomes.

The following examples of The Bays Precinct **Statement of Principles** support this argument: “Establish a powerful and enduring governance model based on whole-of-government collaboration that fearlessly pursues public benefit (No.2)”; “Plan for future generations by being open to new ideas”(No. 13); “Allow the time to invest in genuine and early engagement with, and broad acceptance of our plans from, all categories of the public, government and industry”(No. 4).

This last principle is noteworthy. In relation to this project the process adopted has deliberately opted for a “*short and intensive delivery timeframe*” to “*create [a] buzz around the project while focusing engagement into the present window of opportunity to submit a rezoning application for determination prior to the end of 2014*”. (Communications Outcomes Report page 46). The message pushed from the outset to invited stakeholders in July/August 2014 was “seize the moment” and “the time is now” (Appendix E, p.2 COR) which is the opposite of timely reflection.

In addition, I agree that the declaration of the Study area as a State Significant Site has been made “to fast-track development, switch off heritage protection and shift the balance from heritage protection and enhancement to excessive and unsympathetic development”. (National Trust²).

I would also argue that the fast tracking of this proposal is reflective of a desire to push through planning changes before the World Heritage Listing for the Female

² Submission dated 15 December 2014

Factory is obtained. Such a listing would have a bearing on the type of development deemed acceptable. Concern regarding this topic was articulated following the third Charrette where the question was asked: “How will the scheme impact...efforts to have the Female Factory site included in the existing World Heritage status?” The response by an un-named UrbanGrowth NSW representative was “The site is evolving, as it always has – with buildings being built as they’ve been needed” (COR, Appendix N, p. 2). The answer does not provide clarity and the matter is unresolved.

PHASE 1 of The Cycle process aims to reflect “on the strategic significance of the site, its context economically and culturally, and its potential land uses and beneficiaries. It brings together ideas, ambitions, aspirations and needs to define what want [sic] Sydney can be”.

Strategic Significance of the Site

It appears to be fully accepted by the NSW Government and stakeholders that this site has *national* historical significance. This is not a site that should be considered in isolation of its wide values. This site is integral to the history of our modern nation and particularly, the growth of Parramatta as the food bowl of the early colony to its recently declared status as Sydney’s second CBD. It is in this latter context, that this site’s future needs to be approached.

Potential land uses and beneficiaries

The documentation supporting this proposal does not provide evidence of a genuine attempt to canvass all potential land use and beneficiaries for this site.

As Parramatta prepares to take the mantle of Sydney’s second CBD, it is noted that every great national and international CBD has a recognizable and sizeable landscaped park offering a variety of recreational opportunities. Sydney has Hyde Park, the Botanical Gardens, Centennial Park, Moore Park and more recently Barangaroo Point. Central Sydney has also benefitted from the Sydney Harbour Federation Trust sites opened to the public. Internationally, Shanghai has Houtan Park, New York has its vast Central Park and Brooklyn its combined open spaces of Prospect Park and Botanic Gardens covering areas in excess of 200 hectares.

Against the background of increased urban densification in Western Sydney, the Study Area provides an exceptional opportunity to preserve history and have a landscaped park that genuinely supports the concept of “A Strong Global City” and “A Great Place to Live”. Combined with the improvement of and increased accessibility to Parramatta Park, this would directly link World Heritage Listed Old Government House and the Government Domain with the Female Factory, as well as create diverse recreational opportunities that would encompass walking, cycling, sport and a much needed peaceful setting for simple contemplation.

With sensitive adaption, existing heritage buildings can be used for employment, education, recreational and community purposes. Suggestions for reuse of the buildings within a park setting are:

- The incorporation of the site into the Westmead Health and Medical Research Precinct, with possible inclusion of the University of Western Sydney (UTS). This would be consistent with taking “advantage of the

opportunities offered from the premier health and biotechnology cluster based around Westmead Hospital, Westmead Children's Hospital, Cumberland Hospital and Westmead Private Hospital"³. The focus could be preventative health, an area of growing need in Western Sydney. A Centre of Excellence for Preventative Health does not have the profile of high tech medicine, but would have great long-term community benefits. The facility would create further employment opportunities in the medical and allied fields, as well as complement the capabilities of Westmead Hospital and assist UWS in its ambition to be a world class university. Such a facility may be eligible for resourcing under the proposed Medical Research Future Fund. Encouragement of knowledge-based industries is key to Parramatta being be "A Strong Global City."

- A museum and cultural precinct that links with the National Museum of Australia focusing on pre-federation history and culture including a dedicated aboriginal cultural museum. An interconnected riverside precinct that combines theatres, galleries, library, museums, heritage and parklands (Brisbane's riverside precinct is an outstanding example) would be Parramatta's star asset and potential national and international draw card. The intrusion of residential apartments into this landscape with associated noise, traffic, and litter, immediately negates that vision.

UrbanGrowth NSW has a vital role to play in accommodating the increasing population of Sydney and various locations in the Parramatta LGA would benefit from revitalisation and urban residential densification projects. However, this complex, significant heritage site is not one of them.

The Draft Metropolitan Strategy for Sydney 2031 has set a residential target of 74,000 new dwellings in the West Central and North West Subregion, in which PNUR is located, by 2021. UrbanGrowth NSW argues that the Study Area can contribute to this target (Draft SEPP (PNUR) 2014, p. 32).

The West Central and North West Subregion is a large area encompassing Homebush/Olympic Park to the East, Blacktown/Mt. Druitt to the West and Rouse Hill/Castle Hill/Rydalmere to the North. Already for this area, there have been announcements in relation to opportunities for urban renewal projects with construction already underway in some cases:

- *Parramatta Road Urban Renewal* with relevant precincts of Granville, Auburn and Homebush absorbing nearly 70% of the total growth along this corridor projected to be around 40,000 new dwellings by 2050.
- *North West Urban Transformation Program* where UrbanGrowth NSW is taking advantage of opportunities created by the North West Rail Link to "create high quality, distinctive urban centres at each station... by delivering a creative mix of residential, commercial and retail land uses."⁴

³ Metropolitan Priorities for West Central & North West Subregion. Department of Planning, 2011

⁴ (<http://www.urbangrowthnsw.com.au/work/urban-transformation-projects/north-west-urban-transformation-program.aspx> accessed 1 January, 2015)

- Within the Parramatta CBD, residential towers are on the increase with plans for the current Church Street Auto Alley to be transformed into a high-rise residential strip. There are also countless opportunities for increasing dwelling height and number along corridors such as Church Street (North Parramatta), Victoria Road and Great Western Highway where there are light industrial buildings and ageing residential low-rise flats areas compatible with higher residential densities. Here there is a real opportunity for Parramatta to achieve the Government's aspirations through more appropriately sited urban renewal.

- The image below⁵ indicates the development already underway and proposed for Parramatta CBD, which further highlights that development of the Study Area, is not pivotal to the overall demand for residential numbers. The potential negative impact of urban densification however, on such a unique, nationally significant heritage site is huge. And what is now a publically owned asset will be irreplaceable once divested into private ownership.



- Recent announcements regarding the future of *Camellia* as a potential site for mixed use including residential particularly along James Ruse Drive, provides yet another example within the Subregion (Camellia- 21st Century Business, Industry & Entertainment Precinct discussion Paper Version 1, p.11).

- No doubt there are a myriad of opportunities for residential growth in Blacktown, Westmead and Mt. Druitt.

Brings together ideas

⁵ An \$8 billion boom as Parramatta reaches for the sky: high-rises to transform the Wests capital. The Daily Telegraph. April 14, 2014

1. For a site of this significance, and one with buildings under consideration for World Heritage Listing, the invited list of stakeholders as outline in Appendix G (COR) appears parochial. Whilst acknowledging that some key stakeholders have a significant and valuable connection with the Study Area, this should be balanced by a broader representation, such as can be found in the detailed list of invitees for the Bays Precinct Summit available on UrbanGrowth NSW's website. Notable key stakeholder omissions include Lawrence Nield, Chair of the NSW Heritage Council, Australian Housing and Research Institute, Australian Institute of Landscape Architects, Committee for Sydney, Art Gallery of NSW, Better Planning Network, Tourism Australia, Destination NSW, NSW Office of Aboriginal Affairs, University academics, particularly from the University of Western Sydney, Nature Conservation Council of NSW, NSW Department of Education and Communities, Shirley McCarron, Project Manager of the Cascades Female Factory Historic Site Tasmania and Board Members of the Port Arthur Historic Site Management Authority, representatives from Kingston and Arthurs Vale Historic Area (KAVHA), Norfolk Island, and because of the site's national importance, the Department of the Prime Minister and Cabinet and Australian Government Department of The Environment.
2. In relation to raising community awareness of the proposed changes to this historic site, advertisements were confined to local papers and notices delivered only to homes close to the Study Area. As a resident of the Parramatta LGA, I first became aware of the proposed changes through an article in the Parramatta Advertiser article on August 28. By which time artists' impressions were already showing large-scale development and infill of heritage buildings. I then read about the community drop in sessions advertised in the Parramatta Advertiser on November 26 by which time the public submission deadline was less than a month away. The fact that to September there were only 17 online public feedback submissions received and 18 people (some of whom were invitees) who attended the Sit & Chat sessions, this is strong evidence that public awareness of the proposal and the means to provide feedback was low.
3. Further, in relation to communication methods to "New Group" stakeholders, Swing-Bys included handing out flyers and setting up picture boards in Parramatta Station, a major interchange of commuters in transit. Apart from not being an appropriate forum to seriously engage people in a discussion about proposed development and its potential impact on such a sensitive and complex site, only 500 flyers were delivered. Extrapolating data from 2011, daily entry and exits at Parramatta Station are approximately 11,000 (WestConnex Traffic & Transport Report, 2014). Again this does not support the notion of extensive consultation or a serious attempt to engage with the public. And it must be noted that the second community Drop-In advertised for Wednesday 3 December to be held at Parramatta Town Hall was abruptly closed due to storm damage to the venue. No replacement session was arranged. Again suggesting that process regarding this proposal is not rigidly adhered to.
4. In order to achieve broader engagement, as said by one stakeholder at

Charrette 3 (Appendix N, p.3) the “community needs to see the heritage so they value it too”. This is something that needed to happen prior to the proposed planning changes. The site is under the radar for the broader general public. They are unable to meaningfully engage and contribute to something that they are not aware of. If the NSW Government is serious about achieving “public good”, there should be public open days at the site and a public meeting about the future of the site prior to any planning changes.

5. Whilst arguably not requiring an International Summit, this is a site that would benefit from a National and International Concept Competition that simply focuses on a wide brief of revitalizing a heritage precinct. Inspiration and imagination would then be key to seeing “what Sydney can be” free from the constraints of having to incorporate residential development. A unique aspect of this site is the social narrative that can be drawn from the buildings and their former occupants. This distinction sets it apart from other renewal projects and should be utilised as the inspiration for providing Parramatta the opportunity of establishing a major attraction focusing on social and cultural history.

Consultation Agenda

As reported in the COR, there appears to be a premature emphasis placed on what would be **Phase 3 of The Cycle – Building Cities**. This is despite the fact that the “new global methodology” places specific importance on not using this as the “starting point for major projects”.

1. COR Appendix G provides key outcomes in relation to the Industry Forum held on the 11 December 2013 attended by 19 participants. These are identified as: “strong support for UrbanGrowth NSW” to lead the project; “de-risk the land”; provide “planning certainty”; establish “a clear hierarchy of heritage significance”; create staged “super lots”; agreement that “significant level of activation [is] required” to ensure industry support. Arguably industry is not a key stakeholder in relation to the evaluation of a full range of options for the Study Area. Developers can and will build wherever planning permits and there is an economic return. In any event, the supporting documents do not provide details of industry feedback in the Consultation Report nor how its representatives have informed or influenced the final layout and designs as illustrated on the ILP and DCP. This lack of transparency does not provide confidence in the “process” followed.
2. As detailed in the COR, the planned agendas for the July/August 2014 Charrettes suggests that the process “shepherded” discussion around development across the Study Area, precluding any genuine discussion of alternatives, and apparently steering towards industry key outcomes as outlined above. Charrette 1 focused on “urban renewal”, Urban Growth NSW’s role, “compromise”, cost, planning applications and controls.
3. Stakeholders were asked to consider examples of heritage conservation that showed only densely built environments. None of the examples shown

were comparable to the Study Area, which is primarily an open landscaped setting. It is not a site that has a history of intense development such as The Rocks with its terraces, warehouses and laneways. It is not a site fully occupied by industrial buildings such as the Carlton United Brewery site that now forms the basis of the Central Park development and often referred to in UrbanGrowth's supporting proposal documents. The North Parramatta site's early settlement history is similar in nature to Port Arthur in Tasmania. Port Arthur was not shown as an exemplar or to provoke further discussion on how best a nationally significant site can be commercially reactivated. From the documentation, reference to Port Arthur, particularly its World Heritage Listed Cascades Female Factory, appears not to have been made and its omission and consultation with its board members and state authorities is puzzling.

4. Despite one speaker stating that it is important to talk about "frameworks not buildings" (COR, Appendix K, p. 2), stakeholders in Charrette 2 were then tasked with moving building blocks around to come up with a scaled design concept including the location of a commercial "village" and experimenting with different locations and heights of residential apartment buildings (although block sizes were fixed and some were clear, thus underplaying their impact on adjacent heritage buildings). There was also a session focusing on heritage rankings.

Feedback

The Premier, Michael Baird, was quoted in the Parramatta Advertiser as saying "wide consultation had allowed the biggest infill land development project in western Sydney to go ahead in a heritage precinct" (Parramatta Advertiser, August 28, 2014). Notwithstanding that this statement preempted the completion of several supporting reports to the proposal, examination of the COR feedback shows that at the end of the three sessions, stakeholders remained concerned with the level of infill development and height of buildings which does not support such a mandate.

1. In the COR (Appendix O), the November 2013 stakeholder charrettes' key outcomes are identified as: "protecting heritage buildings, views and areas and telling social history", "focusing development to the north of Cumberland Precinct", strong focus on "Parramatta River and its activation and access" and "opportunity for world class heritage tourism".
2. Participant feedback from Charrette 1 preferred generous open space/parkland, transport hubs, generally lower density, community areas and featured heritage buildings and a site that tells a story. They did not want overshadowed public spaces, too much height and density and lack of balance between open space and built environment or "exclusive looking open spaces".
3. Feedback from Charrette 2 included key points: "Density and scale pushed away from heritage areas", "any new development is not to be higher than existing heritage buildings", "arts, cultural, memorial, tourist and educational opportunities existed in and around the heritage sites" (p. 24,

COR).

4. The notes prepared following Charrette 3 (Appendix N) illustrate that concerns over preservation of heritage and opening the site up for public use and informing a broader section of the public about the site's existence are still foremost. Comments included suggestions that there is "land that seems more suitable for development", "redevelopment is incompatible with the heritage agenda" and concerns about the "concentration of residential cluster". As a "hypothetical exercise" one of the project team requested attendees to name their early interventions for the site if "there was some money around" (Appendix N, p.3). The top two priorities listed are "Support bids for elevating heritage status of the site" and "support the resubmitted heritage application to the Australian Government". It is clear that raising awareness of the site to the broader community "so they value it too" is also a high priority (Appendix N, p.3).
5. Feedback obtained from the Swing-By sessions is summarized in a "word cloud" (COR p. 32). The priority words are Heritage, Pathways, Riverfront and Open. No emphasis placed on development or infill.

PHASE 2 - FUNDING CITIES.

The second phase of the **City Transformation Life Cycle™**, Funding Cities "considers innovative economic and financial models to finance the aspirations established in Thinking Cities" ⁶

In addition, No 19 of the **Statement of Principles** for the Bays Precinct Transformation Project states: "Seek broad sources of funding for urban transformation across a range of investors, including superannuation and pension funds, and philanthropy."

Sources of Funding

The argument by the NSW Government that this site and the preservation of its historical buildings and landscapes can only be achieved and funded by a process of in situ redevelopment is flawed through lack of a genuine attempt to canvass all alternatives. Is The Mint and Hyde Park Barracks to be encroached upon by high-rise developments in the Domain? Should Centennial/Moore Park be part of urban renewal?

The Study Area does not stand in isolation. It is an integral component of the whole Parramatta LGA and its residents. A levy on redevelopment in other areas of the Municipality where rezoning increases land and development values, could along with sensitive adaptive re-use, be used to fund the creation of a heritage park. The cost and benefits of the park would be shared across the community.

As a site of National significance, engagement with the Federal Government is essential. Given the site's overwhelming historical connection to our early colonial history, the nation's growing interest in national identity and the significant

⁶ <http://www.urbangrowthnsw.com.au/about-us/our-approach.aspx>

contribution of women made at the site, coupled with recent revelations of abuse of women and children in its institutions, this site may well be supported by Prime Minister Abbott as Minister for Women and funded in part by the Federal Government.

Corporate and private funding and sponsorship for the significant heritage buildings' restoration and upkeep does not appear to have been canvassed from the supporting documentation.

The short-sighted option of selling public land which is irreplaceable can not be considered "innovative" and any rezoning of the site should be delayed until all viable options of funding the necessary restorations has been afforded the time and breadth that it deserves. The effect of such a proactive investigation may result in a decreased need for development or in the best-case scenario, redevelopment that is solely related to the adaptive reuse of the heritage buildings. In this latter case, there would be no need for rezoning as the current B4 Mixed Use enables such actions.

Breakdown of Costs

The premise that heritage restoration and adaptive re-use can only be feasible if funded by in situ urban densification, and thus a proposal for rezoning, has driven this project. It is therefore integral to this proposal that details regarding these costs be fully analysed. A table (the Table) of projected costs was shown in a presentation during Charrette 1 (Appendix F, p.11) and based on this total, Geoff Lee M.P. in an opening address at Charrette 2, reiterated that "half a billion dollars is a lot of money and – in order to deliver a feasible outcome –planning will involve compromise." UrbanGrowth NSW has prepared a business case "that considered the costs for delivery of enabling works and restoration works to heritage significant buildings" (DEPP, 9.1). However, at 9.4, it states "a detailed condition report of the heritage buildings has not been undertaken to definitively prepare costs estimates". This appears contradictory and indicates lack of sufficient time for thorough preparation of this proposal.

Of the costs listed in the Table, \$ 105,000,000 is allocated to NSW Health. Presumably the costs are related to the relocation of Cumberland Hospital staff and patients. This cost is not dependent on the revitalization of the heritage precinct. Plans and costing are already underway, driven by the Westmead Health Alliance, for the creation of a new mental health facility at Westmead Hospital and the gradual relocation of the Cumberland Hospital. ⁷ It is unclear what some of the items in the Table represent, for example, "Land 42.5 million", and how this figure has been achieved. Further, a number of itemized costs also appear to relate to supporting infill development and not addressing existing preservation of buildings.

Notable, is the absence of any estimates in relation to income to be derived from the sell of public land, how this income would be applied to the restoration works and over what time period, particularly given that this project is estimated to evolve over 15 -20 years. Nor are details provided, regarding possible sources of

⁷ Westmead Health and Medical Research Precinct A Plan for the Future, June 2013

income currently derived by Parramatta Council that could contribute to the revitalization of the Study Area.

Greater clarity of cost is required before the proposal by UrbanGrowth NSW can be fully considered.

B. The proposal to rezone the Study Area is inappropriate, lacks detail, clarity and contains inconsistencies.

Inappropriate

The Study Area of Parramatta North Urban Renewal [PNUR] subject to the current rezoning application is “part of a unique collection of world, national and state listed heritage sites...[that] fronts the Parramatta River and incorporates a rich history of Aboriginal, early colonial, 19th Century and 20th Century uses” (New Planning Framework, [NPF] p.10 and p.11).

Given its uniqueness, it is of concern therefore that the future protection of heritage assets cannot be guaranteed despite the current proposal, ILP and Draft DCP.

The Draft DCP provides in 4.3.5.5., that variations to the ILP will only be considered where the amendment “would not significantly alter the planning outcomes...and where better outcomes can be demonstrated” and if these conditions cannot be met, council can then “condition the development consent” or “request the applicant to demonstrate...the amendment of this plan is warranted”. The definition of “better outcome” has not clarified.

Typically, when Council does not accept a developer’s application redress is sought in the Land & Environment Court. Approval is often granted because of poor documentation of planning controls. This paragraph of the DCP highlights that there are no real safeguards in place for the preservation of the heritage on this site once the Lots and residences are in the hands of private owners and lessees and influenced by a plethora of different Body Corporates and Strata Managers.

The provision of **open space** for this site is a common objective of stakeholders and a claim of the proponents. In relation to the Cumberland Precinct ILP:

- Of the 30 hectares in the Cumberland Precinct Study Area, only OS/ 1, OS/ 2, O/S 3, O/S 4 and E3 are designated as open space. This represents approximately 6 hectares of the total. This alienation of 80% of the original public land to open space use is contrary to the commitment of governments to create more urban green space by 2020 under the 2020 Vision.
- Of these 6 hectares, pedestrian river access is limited adjacent to Lot F8. The open space comprising the “foreshore park” will be reduced by the river embankment and overshadowed by private buildings up to 6 – 8

stories.

- It is proposed to rezone O/S 3 “the Oval” from B4Mixed Use to Re 2 Private Recreation. In the artists’ impressions of the developed site and supporting literature, the oval is the central focus for public recreation as a “potential community use as a sports field”. As public space within a densely developed context, its rezoning as RE2 Private Recreation is inappropriate. This area should be RE1 Public Recreation.
- The remainder of the delineated green space in the study area of the Cumberland Precinct is designated private ownership. Detailed information regarding each Lot in the Draft Amendment to Parramatta Development Control Plan 2011 (Draft DCP) shows some “Public space within the Lot” with allocations for varying use from access to residential units, private courtyards exclusively for residential occupants, “through site links” and areas surrounding heritage buildings. The DCP and Framework are lacking in any detail as to how this nominal “public space” will be accessed, delineated and maintained on what will be private land, particularly given that “public access should be balanced with the privacy or security needs of the development”(Framework, p. 36).
- The removal of insignificant or intrusive buildings from the Study Area provides an opportunity to create more open space and better showcase the heritage buildings. However, further independent assessment is needed in relation to the rankings of buildings on the site.
- Claims in supporting documentation that “non-residential re-use of heritage buildings” and “the site and its heritage is accessible to the public” (DCP 4.3.5.2) are not supported by the plans that reveal encroachment of proposed buildings do not provide “appropriate curtilages” for landscaping, and other external features such as covered entrances, nor how private and public open space will be defined by physical means or otherwise. The traffic, amenities and recreational needs of its occupants will perforce take priority over the public and overpower the site. In most cases, the recommendations that new buildings should “be of similar low scale [and] not detract from the more significant structures of the former Female Factory/Asylum Precinct” (Heritage Assessment Report) have been ignored.

In relation to specific rezoning proposed for height, the following comments are provided:

- **Lot F8:** F8-1, F8-2, F8-3 and F8 – 4 should not be built. The size in height and bulk completely dwarfs Bethel House diminishing its heritage characteristics and setting. F8 - 5 should be reduced in height to 2 storeys and provided as a public amenities/community building. F8-1 and F8 -2 block any chance of opening the site and providing some connectivity with the Sport & Leisure Precinct and further along the river the Riverside Theatres. As proposed, from a distance the wall of F8-1 will refute any suggestion that this area is open to the public. The current wooden and iron fence between the external wall and building 5 of the Orphanage

should be removed to allow access to the other side of the Orphanage and the river as a means of providing pedestrian access.

- **Lot F7:** F7-1 and F7-6 should not be built. F7-1 will obscure the view to the main section of the Orphanage. The placement and height of the 6 storey building completely dominates this area and overpowers the heritage building within it, and diminishes the view and importance of the clock tower attached to Ward 1 of the former Parramatta Asylum. The courtyard in which the buildings are proposed could be a location for a shaded garden given its mature trees and place for quiet contemplation, particularly in view of its history.
- **Lot F6:** Building F6 should be sympathetically/historically designed to complement the heritage buildings, be for public use and restricted to 2 storeys.
- **Lot F5:** There is no adequate detail or justification provided for this 12 storey building. All buildings within this Lot should be reduced to 2 storeys.
- **Lot F4:** Building F4-3 should be reduced in bulk, building F4 -1 should be deleted to maximize open space and all buildings should be reduced in height to 2 storeys.
- **Lot F3:** UrbanGrowth NSW proposes to remove a heritage building where the ranking is contested and replace it with a commercial village centre to service primarily the new residents. If any building is developed here it should be outstanding as a world-class, national cultural facility accessible by all Australians, such as a Museum of Australian Sport that would tie in with the adjacent oval and its history. Again it is too early in the process to be so prescriptive as to the individual heights of this complex as outlined in the DCP as this restricts the type and creative design for such a facility. Nevertheless, in keeping with the associated heritage buildings, it should not exceed three storeys.
- **Lot F2 & F1:** Buildings should be restricted to 2 storeys.
- **Lot E3:** It is difficult to ascertain the rationale and none is provided behind proposing a 16 storey building that impacts directly on the boundary of the State Heritage Listed Parramatta Gaol, the Oval and Heritage building 75 (Recreation Hall and Chapel), as well as obscuring the view of Parramatta Gaol from opposite sides of the Oval. I note that TKD Architects Built Heritage Assessment recommends retention of the Gardener's Cottage within this Lot.
- **Lot G1:** I understood that stakeholders were keen on maintaining an open view into the study Area from Factory Street. The high bank of development proposed in this Lot completely isolates the precinct and obstructs what would be an enticing overview of the site and natural connection of the Cumberland Precinct with Parramatta Gaol. These buildings should be deleted.

- **G2:** Like G 1, these buildings corrupt the view to the heritage buildings located in F6 & 7 and should be deleted.
- **H 1- 4:** Development on the eastern side of Fleet Street can be achieved but I would submit that the setback of the buildings should be increased and those buildings immediately facing Fleet Street and the opposite Lots should be reduced in height to 3 storeys. I am unsure of the rationale for the 20 storey buildings and their location and the configuration generally of these Lots to comment further.
- **Lot B:** These are enormous in size and height and it is difficult and pre-emptive to attempt to define with such exactness the location of buildings that abut the Parramatta Gaol and land subject to aboriginal land claims without knowing the outcome and future of these neighbouring sites. And for this reason, the rezoning of this Lot should be deferred.
- **Lot A1 & A2:** Again the rationale for the choice of layout is uncertain but in principle I have no objection to redevelopment of these Lots.
- The subject of heritage landscape and retention and possible removal of trees is outside my scope of expertise except to say that the DCP should be quite clear at this stage what is proposed. Phrases like “retain if practicable” are too loose. Particularly given that the adjoining Parramatta Park tends to comprise a more open, sparse layout in terms of vegetation, it seems counter-productive to be removing mature trees only to replace them later. The argument provided in support of removal, namely “trees are finite”, is not a considered and “world-class” justification.

Lacks Detail and Clarity

- The DCP (4.3.5.10) refers to removal of two “high significance” buildings but does not state which ones they are. Further, “this is considered acceptable” again based on the notion of “pay-off” and “compromise” – that is, removal will “facilitate new development required to provide for the conservation...” The question remains, what independent authority considers this to be “acceptable”? Such an approach is not acceptable in a document intended to be a “guiding” reference for planning.
- This section also states “the PNUR Built Heritage Management Strategy has been prepared to guide development”. It has not. If seeking to approve changes to the DCP 2011 with the proposed Draft, preparation and availability of the Built Heritage Management Strategy, and confirmation as to which heritage buildings are to remain in public ownership and those which are not, must occur prior to any changes to the DCP 2011.
- In relation to parking and traffic, the Draft SEPP (PNUR), p. 75, refers to the number of car parking spaces required under Council Control. Given the projected number of dwellings, this would be in the vicinity of nearly 5,000 cars and spaces required, not including visitor parking for residents and commercial use. The Draft DCP refers to “Access and Parking” in its contents which refers to the Development Lot Controls and in each of these,

there is only shaded areas referring to “Potential Underground Parking” and “Potential Above Ground Parking”. Excavation depth for underground parking is unknown and the possibility of above ground parking may mean that developers keen on maximizing their yield may not wish to sacrifice floor space yield and use Section 75W to lodge an Application to increase the buildings' heights. Again, such matters must be fully considered before rezoning so that the public is made fully aware of the potential impacts on the site and adjacent heritage assets.

- The movement of in excess of 5,000 cars throughout the Study Area envisages a suburban landscape. Combined with the use of Bridge Road as a connective route into the Westmead Precinct and suburbs beyond, (anticipated in its Plan for the Future already mentioned), the Study Area has the potential to become a heavily trafficked route into other areas of the Parramatta CBD. This will negatively impact what fauna remains and atmosphere of the precinct as portrayed in various artists' impressions supporting this proposal.
- 30 hectares of the Cumberland Precinct is subject to rezoning proposal. Of the remaining 10 hectares that are subject to an aboriginal land claim, no indication of that area's future use or management plans are in place and information regarding how this area would be integrated into the whole. This area is not subject to the controls that are being proposed for the remainder of the Cumberland Precinct and with this current uncertainty it is difficult to accept that planning changes can be formalized while this area is still under consideration.
- Greater clarity regarding ownership of land surrounding heritage buildings to be retained under the proposed UrbanGrowth is also required. The decisions made regarding ownership should then be used to inform any changes to planning that might be required.
- The Draft Amendment to Parramatta Development Control Plan 2011 is central to implementation of UrbanGrowth's scheme for the Precinct. In effect the amendment to the Control Plan is a “blue print” providing, lot by lot, the details of buildings to be retained, the footprint and height of proposed buildings, setbacks and public open space. The document however, lacks any detail in relation to how the heritage buildings within these Lots are to be maintained, accessed or adaptively re-used. Examples abound of unique heritage buildings being used as take-away outlets or pedestrian shopping outlets. As it stands the Draft DCP only makes recommendations as to the mitigation of adverse impacts on heritage significance (p. 62 Draft SEPP (PNUR) 2014) and this site is too fragile and important to be proceeding to planning changes without some certainty regarding the heritage buildings and landscape.
- Further, the various supporting management and strategy plans (Aboriginal, Archaeological and Cultural, Built Heritage etc.) have not been developed. It is therefore not possible to fully assess the appropriateness of the control plans to satisfy the universally acknowledged need for sensitive reuse of the site. For example the Cumberland Precinct contains medium to

high archaeological potential with the historic filling of the site above flood levels protecting Aboriginal archaeological evidence (Aboriginal Archaeological & Cultural Heritage Assessment, Comber Consultants, October 2014). Archaeological testing is recommended to gain a detailed understanding of the nature and extent of Aboriginal “objects” within the study area and consequently assist in the formulation of management recommendations for Aboriginal objects. Testing may well identify constraints to undertaking bulk earthworks (including underground car parking) needed for the proposed development. The lack of detailed management plans and strategies again highlights the rushed nature of the process to rezone land for which there is no demonstrated, immediate need. As previously stated, well serviced sites with little redeeming historical or architectural value are available for redevelopment throughout the Parramatta LGA, and state and Local government should be facilitating their timely redevelopment as a priority.

- The proposed buildings and associated heights are purported to have evolved from the consultation process and subsequent Project Team amendments. Nevertheless, there is no real detail or apparent transparency or justification as to the basis upon which the locations, configurations, bulk and height of each of the proposed buildings has been determined. Apart from some photos taken at the charrettes of the models being made during workshops, and some projected view shots of impact on landscape, the ultimate plan put forward provides no detail as to the incorporation of stakeholders or influences by them or industry on the final scheme offered. This makes it difficult to address the proposal by a process of considering the rationale that has been used to make these decisions. This is important given that the Draft DCP proposes to define very exacting parameters in relation to each of the Lots which once approved lays the foundations for the site.
- The anticipated use of the buildings, that is, whether for residential, commercial or public use, is not clearly identified from the ILP and DCP. For example, in Lot F6, it is not possible to determine whether this building is proposed as a community/public facility or residential block. This lack of detail makes assessment of the scheme and rezoning problematic.
- The Draft DCP refers to page numbers in its “Contents” but in fact does not number each page and has all the appearance of a hastily compiled document in relation to content, other than the specific Lot details.

Inconsistencies

- The Draft DCP purports to champion design excellence, however, this only relates to buildings ten storeys and over (4.3.5.3). This has the affect that the majority of the buildings and specifically those proposed to be adjacent to the significant heritage buildings are exempt from this standard. The very reasoning put forward by stakeholders for lower height buildings was to try and minimize the impact on the heritage buildings and yet they are not subject to design excellence. How is this supporting a goal of a world-class precinct where the buildings “within the PNUR are of the highest

standard”? All buildings within the Study Area should be subject to Council’s Design Excellence Advisory Panel.

- On the matter of heritage rankings, the Central Male Block has been stated as having “moderate” significance, meaning it will be demolished with plans to replace it with a “Village” commercial complex. This block, however, has been ranked of “high significance” by the 1998 Department of Public Works and Services Heritage Group North Parramatta Government Sites Conservation Management Plan and by the 2010 Perumal Murphy Alessi Conservation Management Plan 2010. Such inconsistencies require expert independent panel review prior to any proposed planning changes.
- Concerns raised by the National Trust⁸ are reiterated in this submission, namely, “the mistreatment of view lines in the *MUSEscape Parramatta North Urban Renewal Cultural Landscape Heritage Assessment*” and misleading photomontages from page 75 and onwards. For example, images have been composed to include the greatest number of trees in the mid-ground, effectively obscuring the outlines of the buildings in the background as in the case of figure 51, where if one were to “step down just six steps” a completely different view would show “a ridgeline of towers”. Other examples are cited and that demands a more thorough and independent investigation in order to assert that ‘there will be no visual impact’, ‘with no negative impact’ and ‘the visual impact on Old Government House & Domain World Heritage values is considered acceptable.’
- Criteria for UrbanGrowth’s role in urban transformation projects require that ⁹:
 - The project provide, inter alia, “community amenity”.
The “ILP does not include built facilities for broader community use” and “ownership and management of the proposed public open space areas is the subject of ongoing negotiations” (Draft SEPP (PNUR) 2014, p. 85). Whilst there is a suggestion that there may be community facilities available via adaptive re-use of heritage buildings, this proposal lacks any detail in relation to which buildings and what uses may be anticipated. In fact under the plan, facilities currently used by community organisations such as The Memory Project and Parramatta Men’s Shed are slated for demolition with no replacement facility outlined in the documentation available to the public.
 - “There is a nexus between development and public infrastructure, particularly transport”. With a proposal aimed at rezoning public land to accommodate 4,100 dwellings with an assumed population increase arguably 8,000 people, the Draft SEPP (PNUR) 2014 states: “...this Study does not rely on a light rail transport solution” (p. 36). This leaves residents to rely on local buses and two stations that are at least 1.4 kilometres’ walking distance. These stations are not conveniently located for older and less able-bodied residents, and in such conditions it is likely that commuters would opt for the flexibility of

⁸ Submission dated 15 December 2014, p. 5 & 6

⁹ <http://www.urbangrowthnsw.com.au/about-us/about-us.aspx>

private car transport rather than the lengthier combined bus/train option. And although cycle ways are proposed, the reality is, that many people do not work where they live and will not be commuting by bicycle. “No new schools are proposed within the Study Area” (p. 86). The report does not indicate whether any new schools are proposed outside the Study Area that would be essential for an increase in population for this area, despite the fact that the Report acknowledges that 30 % of the population in the PNUR area will be in the 0-24 age bracket by 2031. In the inner suburbs of Sydney, the State government is confronting the lack of services for the increasing population density and is grappling with the need to acquire real estate in order to meet the pressure¹⁰. This UrbanGrowth NSW proposal does not consider such future demands on government and is “kicking the can down the road”.

An Alternative Vision

UrbanGrowth’s proper mandate is to facilitate development of NSW government land and provide private housing, one that is inevitably going to be at odds with preservation of this site for all Australians and management by one Government authority.

It is undisputed that many of the publically owned heritage assets are “unused or under-utilised and many are in danger of having their heritage value diminished...” (Draft SEPP (PNUR) 2014, p. 25). Recognition of this incredible public asset is long overdue but we must take the time to ensure the best outcome for the site and the public and not just for short-term political gain.

Realising the ambition that Parramatta be “A Strong Global City” and “A Great Place to Live” is long overdue. Parramatta is the demographic heart of Sydney and the location of unique and nationally significant heritage, as well as having large urban areas warranting redevelopment.

The PNUR precincts provides an opportunity to realize this ambition through creating an integrated network of public parkland that stretches from Lake Parramatta’s natural bushland, through the Cumberland and Sport & Leisure Precincts with connectivity to Parramatta Park and Old Government House, through to the Riverside Theatres and Eat Street. The Precinct could readily incorporate the reuse of historical buildings for medical research, education and cultural facilities.

In combination with Experiment Farm Cottage on the site of the first land grant in Australia (1789), Elizabeth Farm (Australia's oldest European dwelling) and Hambledon Cottage built by John Macarthur in 1824, visitors to Parramatta will have a rich, multifaceted experience and locals a focus for their civic pride in the area. What public figure would not want to be associated with the creation of such parkland recognized locally, nationally and internationally?

¹⁰ Sydney City Council and Department of Education finally agree on new inner city school. SMH 15 December 2014.

The parkland would complement urban renewal projects underway and planned for the Parramatta LGA. Public assets will be retained for the benefit of the community now and future generations, and underpin the success of a livable, second Sydney CBD – a desirable destination to the congested inner city. The success of Parramatta as a genuine CBD will have wide spread benefits in employment, transport and meeting the social and community needs of Western Sydney.

Conclusion

We are nearing the centenary of the Gallipoli landing and there is a widening interest in Australia's history and the creation of the Australian character¹¹. It can be strongly argued that the character of Australians was formed in the early years of settlement where people were wrenched from home and family, faced incredible hardship but had social mobility not common for the time. The Australian character was not formed at ANZAC Cove but demonstrated.

The development of the "ANZAC spirit" can be traced in the 200 years of social history present in the buildings within the Study Area, and potentially the aboriginal objects and stories buried beneath. The land and buildings of the Cumberland Precinct, and similarly others around Parramatta and nationally, are part of our early history and should like other aspects of our heritage be valued and respected.

Urban high-rise that in-fills our precious heritage buildings is not the answer. Do not allow changes that will allow the heritage buildings and stories of our National identity to become marginalized and invisible like their former occupants.

The planning for the North Parramatta must be conceived and developed from a wider perspective to capture the real value for the whole community.

¹¹ Australia: The Story Of Us: a documentary series spanning 40,000 years of Australian history. Channel Seven, 2015.

North Parramatta Urban Renewal

Attn: Anna Johnston, Senior Planner – North Parramatta State Significant Site

Submission by:

9 April 2015

I'm writing in response to the North Parramatta Urban Renewal project.

I hold grave concerns for the female factory precinct. I'm a direct descendant of Emma Mayner who was incarcerated in the female factory. The photo below taken in 1860's shows Emma with two of her daughters, of which one died not long after this photo.



Over the past 10 years my family along with a band of other descendants and friends of the female factory have been slowly piecing together the history of women transported who were here in this precinct.

In 2008 the "Women Transported" Exhibition – Life in Australia's Convict Female Factories was opened by the New South Wales Governor, Her Excellency, Professor Marie Bashir, AC.

The exhibition travelled to Canberra where it was displayed in the National Archives. The tour also went around the country.

As part of the exhibition a podcast of an interview with my mother was made with ABC radio

www.abc.net.au/worldtoday/content/2008/s2327261.htm

Emma's life and family turned out to be an Australian Story. And it's a story that will eventually be told to thousands of visitors when the precinct can be upgraded.

The development proposal is not welcome, especially anywhere near the female factory.

What are we to say to the Ex-Governor of NSW Dame Marie Bashir?

The precinct as a whole should be listed on the national heritage register. But development should not proceed within the precinct.

The National Heritage Listing should:

- Recognise that the Parramatta Female Factory is a very important site of National heritage significance, particularly for women's history in Australia.
- Include the Parramatta Female Factory on the priority assessment list for National Heritage assessment;
- Consider including important buildings in the areas around the Female Factory, particularly the Girls Industrial School/Roman Catholic Orphanage, Parramatta Gaol and the surrounding precinct for National Heritage assessment.

Thought must be given to look beyond the next economic cycle.

Looking forward and beyond to 2100, as more development occurs in western Sydney, this precinct in this location will become more valuable to the public as open space becomes limited.

"Liveability" is the current theme in government departments, and open space, culture and heritage are the things that people value.

Some of the great cities of the world have dedicated open space, such as New York, London and Sydney. Parramatta Park and its precincts rivals these open spaces in size.

Don't you think it will look a bit like the photos on the following pages

Location	Size
Parramatta Park Precincts	2km x 0.5-0.9km
Central Park, New York	4km x 0.9km
Hyde Park, London	2.5km x 1km
Hyde Park, Sydney	0.8km x 0.3km
Botanical Gardens, Sydney	1.5km x 0.8km

Central Park, New York



Hyde Park, London



The development

Overall, I find the scale of the development overpowers the precinct. Towers belong in the CBD.

The Cumberland precinct was designed for psychiatric patients to have open space, seclusion, isolation, quietness. All of these were for healing. This is the recipe that is the character of the area.

Economic Assessment

It is understood that the precinct has to pay for itself.

If part or all of the precinct becomes heritage listed, self-funding should not be a requirement.

The report seems short on what is required for upkeep in dollars.

\$0.5M as a one off seems to be communicated in one of the website consultation reports. Additional yearly expenses would also be required.

The economic assessment says \$805M/year in output post construction.

If the above figure is correct, then the development is significantly oversized.

Ecological Report

In the summary document 1.OPNUR A3 Summary Document, the ecological assessment only focuses on how the development impacts the fauna. But how will the fauna impact the residents?

The ecological report states tree problems on page 25.

Damage to native vegetation and proliferation of weeds

While landing and flying within their roosts, flying-foxes will often defoliate and break branches. Tree deaths are common in densely populated camps or during prolonged periods of camp occupation. GHFF have damaged the upper canopy and much of the mid strata native vegetation within the Parramatta camp, particularly on the eastern side of the river. This loss of canopy, combined with increased levels of sunlight reaching the lower vegetation strata and increased nutrient loadings has led to a proliferation of exotic weeds.

This is beyond silly.

Why write a report which says sensitive infill development.

Geoff Lee MP has now said he wants to make it for tourism. Too bad we have to explain to tourists about a block of units within the convict built courtyard.

Not a good look.

FF colony next to units. As per ecological report - Lighting from Units will disturb the bats. Bats have noise and smell. Loss of tree canopy. Poor aesthetics from unit block.



Traffic

The traffic report page numbers are incorrect. They're all page 55.

In section 7.3 Background growth

Notwithstanding the above, RMS has recently released a tender for the strategic modelling study of Parramatta area. The results of this study would provide additional guidance on the future growth in Parramatta and its vicinity, which could be incorporated in the later stage once the modelling results are made available.

Strategic level modelling should have been undertaken before this study, and thus provide direction on the real traffic problems into the future

The problem with the traffic report only details the additional vehicles from this precinct. There is no integration of the greater Parramatta area and all predicted growth and development within the planning horizon.

Any long term plan requires consideration of the planning horizon of up to 20 to 30 years.

My major concern with the traffic report, is that I think the strategic study will show considerably more traffic to the north and south of Parramatta, and thus Bridge Rd through to Westmead will become an overflow with high volume rat running.

The traffic assessment only took numbers going through bridge rd,

There is no analysis that I could find for traffic flows along Hawkesbury Rd and Darcy Rd.

On Page 11 of the Traffic report, last paragraph, it discusses Hawkesbury Rd and surrounding area but seems to indicate in the last sentence that "This residential pocket of land is separated from the lands the subject of this study by Parramatta Park. ? Seems to be a spelling mistake ? Are we to assume it's out of scope ?

Adding to all of this, the nearest boys high school from the Cumberland precinct is Parramatta Marist Brothers. So quite probable that any new population in the precinct will drive their children to school through bridge rd.

With higher volumes through Bridge Rd, this places the hospital and emergencies services to access and egress the hospital at risk of longer times to respond.

Ms Carolyn McNally
Secretary
Department of Planning & Environment
GPO Box 39
SYDNEY NSW 2001

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Yours sincerely



Name NONI STAGGS
Address 25 JOHN ST
RYDALMERE 2116

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Secretary
Department of Planning & Environment
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SYDNEY NSW 2001

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Bruce Wheeler
13 Williams Road
North Rocks NSW 2151

Ms Carolyn McNally
Secretary
Department of Planning & Environment
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SYDNEY NSW 2001

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Yours sincerely

A handwritten signature in black ink that reads "Barbara Gurney". The signature is written in a cursive, flowing style.

Barbara Gurney
National President of the Clan Campbell Society of Australia
26 Clanalpine Street
Eastwood 2122

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Secretary
Department of Planning & Environment
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SYDNEY NSW 2001

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Yours sincerely

Brian Powyer
Northmead 2152

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If we don't stop encroachment on this pioneer heritage site we are guilty of progressively destroying evidence of the forward thinking and planning of this country's pioneering visionary founders.

Yours sincerely

David Sommerlad AM
Castle Hill
02 9634 3077

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Yours sincerely

Name Raymond Goddard

Address 66 Bradley Drive Carlingford NSW 2118

My ancestor Rosa Way attended the Female Factory and was buried at the Catholic Cemetery as Rosa May.

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Address

North Parramatta Urban Renewal – Public comment - Objection

1. Response to the Current Proposal theme

Theme of this development is residential. Urban growth brief is primarily to increase in accommodation for increasing population. The proposal shows it's not interested in sustainability or managing for the future Australian history.

The only real link in this development proposal to the significance of the heritage values is that it has listed some historical buildings on the site to be retained. It does not seek to develop this area that is significant in relationship to its values as part of the overall national estate, particularly its significance in Australia's history. For Parramatta city it is a prime site for tourism, based around its significance in Australian history, and the potential development values to add to the significance of the overall Parramatta as a heritage destination, Parramatta the city showcasing Australia's history to the world.

It seems from the documentation that there is no attempt in the proposal to accommodate these themes in the proposal. No attempt to provide facilities in the plan for tourism that access to this site could provide. Instead it concentrates in providing urban amenities solely. The reports suggest that there is transport access for this residential development, that its part of unlocking the cities heritage. But the development is dominated by the "to be built environment". With high rise Buildings to overshadow the site.

1.1 North Parramatta, part of the vertical city theme

The issue of the theme and residential facilities is a partnership with Urban Growth and Parramatta City Councils vision has been to create a vertical city, which has no link to its historical significance. This view is seen in councils move to include this area as part of the CBD, all the way to the Northmead. This development complies with Parramatta Councils city theme of trying to outdo Sydney skyline, with comparable High rise development primarily developments well above 23 metres.

1.2 Significance of the North Parramatta site, proposal for short term financial gain

North Parramatta area is very significant to the overall historical significance of Sydney and Australia's European settlement. Most of the preserved remnant of early Parramatta buildings is north of the river. So if we adopt this proposal we can preserve the few buildings that the proposal has nominated as significant. And put them into a context that effectively isolates there significance, both historically and tourism values will be lost. This has the long term effect of robbing the citizens of Western Sydney from having a first class cultural centre, bring in sustained employment and long term tourist dollars. For what gain: short term residential driven revenue growth for the stakeholders Urban Growth, NSW Treasury and Parramatta Council.

2. Potential for a better outcome - Develop the site as an International destination

Alternatively we can design this area that makes it into *a long term growth area driven by a better mix of heritage and Tourism and mixed [residential] development* at a lower FSR and building height. This falls outside Urban Growths residential development preference, and this agency may not be the best organisation to handle this revised project brief *as it would be better handled as an international design project. Such is the potential for development of this site into a world class heritage tourism area. That would put western Sydney on the world map.*

The current proposal rules out buildings that are significant and removes trees and vegetation to squeeze more residential buildings. These Moderate classified buildings make sense of the sites history. These may need to be considered as desirable to provide this site with its history into recent times. The lowest classified buildings that detract from the sites historical themes would be removed as per the current proposal. As the current proposal needs space for its predominant residential feel to this area

2.1 The required *Theme change*

North Parramatta site is a time capsule of European settlement of Australia, and links into the world heritage Parramatta part estate. Its location at the end of the navigable waters of Sydney Harbour has bonus that the River links the two great assets that Sydney has.

If we really serious of sustainable developments, that brings long term dollars and jobs to western Sydney. Parramatta is ideally suited to provide that future through its links to its past. This will also generate revenue that NSW Treasury and Parramatta Council, seek to harness from this site.

The fabric of the built history of Parramatta is being eroded quickly, so this effectively is the last chance, as the site size, is what will make this future possible. Once it is lost to High rise and mixed development then a sustainable future for both Sydney and Parramatta through this tourism base will be lost forever.

2.2 What could it be like!

Across the world Cities have sought to provide link s to their past. These have been more than theme parks. It's providing spaces that are dominated by the past with facilities that make it possible to walk through and engage with these sites. Australia's built environment is only young in world terms. Australia has not developed any such sites. So our history, has decayed, or transformed by turning old assets into new ones. This theme that now dominates our political landscape is short term. We lost more of our built heritage. Parramatta being such a significant site for the early development of this colony is in a prime position for developing such a world class site.

Theme: Parklands that feature the historical buildings

Development provides no less than the open space as currently existing.

Bulk of any new buildings is below ground.

Height zoning as currently exist, buildings to be developed based on the theme

All the buildings be linked underground providing retail and commercial spaces

Site area be landscaped grasses and paths - similar to Royal Botanical gardens

The only site transport corridors at ground level, be for Light rail and bicycles

Transport Link to Westmead precinct only be Light rail Cycleway.

With the light rail bridge, capable of handling emergency services vehicles

The whole site to be car /vehicle free area

Only At Ground level parking is for coaches, provided in the development that is landscaped to hide theme, if it was not possible to bury this area too.

Any Residential apartments to be sited only at the extremities of the site far away from significant buildings the river and vehicle access directly from outside the site below ground.

Overall Objection is that the proposal from Urban Growth if adopted is the wrong theme for this site! A theme based on short term gain and not what's best for the site and Western Sydney, and Australians.

Kim Riley, Westmead



Our reference: EF14/25540:DOC14/278996-02:PW
Contact: Paul Wearne (02) 4224 4100

Department of Planning and Environment
(Attention: Anna Johnston/Emma Hichens)
GPO Box 39
SYDNEY NSW 2001



Dear Ms Johnston and Ms Hichens

PARRAMATTA NORTH URBAN RENEWAL PRECINCT

I am writing to provide comment on the exhibited Planning Report and associated studies in relation to the Parramatta North Urban Renewal (PNUR) Precinct received by the Environment Protection Authority (EPA) on 19 November 2014.

The planning report states that the proposed PNUR will involve the renewal of a 146 hectare area to provide the creation of a heritage mixed-use precinct, provision of new housing (approximately 4,100 homes) and employment opportunities (approximately 4000 new jobs), community and cultural spaces including a Sport and Leisure Precinct. It is also supported by the *Draft Sydney Metropolitan Strategy* and recognised as an urban renewal opportunity for the Sydney Greater Metropolitan Region (GMR).

On the basis of a review of the submitted information the EPA considers that this information has not adequately addressed a number of issues raised in our response dated 29 September 2014. The EPA considers the issues and information provided in the EPA submission still important and should be considered by Department of Planning and Environment (DPE) in its assessment and determination of the proposal. The EPA has provided further information in the attached comments (Attachment A) for DPE's consideration. These relate to:

- Noise
- Water Quality
- Waste Management
- Contaminated Land Management.

The EPA is able to meet with DPE at a mutually convenient time to discuss any of the above issues. If you have any questions regarding this matter, please contact Mr Paul Wearne on (02) 4224 4100.

Yours sincerely



24/12/2014

GREG SHEEHY
Manager Sydney Industry
Environment Protection Authority

Att

ATTACHMENT

1. NOISE

The following outcomes should be included in the proposed State Environmental Planning Policy (SEPP):

- to provide strategies at a local level to ensure noise emissions do not cause adverse impacts upon wellbeing and amenity
- to avoid land use conflict.

Matters for Consideration

The Planning Proposal indicates that the proposed PNUR precinct will include:

- transformation of the sports and leisure precinct into an entertainment destination for Western Sydney supported by 34,000m² of mixed use, predominantly commercial space
- around 4,100 new dwellings
- nearby buildings up to four to eight storeys and in the vicinity buildings of 12 to 30 storeys.

The EPA advised in its response dated 29 September 2014 that there are a range of noise issues associated with the operation of entertainment venues which can result in land use conflict, especially where they adjoin residential communities. In particular sustainable land use planning involving the careful siting and design of sensitive land uses and the management of existing noise sources at entertainment precinct will lead to the best environmental outcome. This, due to the potential to address noise issues retrospectively may not be viable, is usually limited and more expensive.

The EPA also recommended in its response that the planning proposal should:

- *Detail and provide justification for the mix and location of proposed and existing land uses having specific regard to acoustic compatibility between noise generating and noise sensitive land uses.*
- *Provide draft zoning and planning controls to amend the Parramatta LEP including height, FSR, heritage and noise compatibility requirements to ensure that potential noise related land use conflicts are identified, and were necessary addressed at the design and construction stage of development. This should include measures to ensure that purchasers of residential premises are aware of the mixed use nature of the zoning and the potential for legitimate noise generating activities to be audible and potentially impinge on their acoustic amenity.*

The submitted Planning Report only considers noise from road and rail sources as required by the Infrastructure SEPP. It states that:

"Where relevant, future development applications will be required to address and satisfy noise and vibration requirements for development in the vicinity of transport corridors".

The EPA advises that land incompatibility issues should not be left to a post-approval phase but rather undertaken as part of the concept planning for the proposal to inform future development and ultimately the determination of the proposal. In particular, the EPA recommends the proponent should document information that details:

- How the leisure precinct and surrounding land uses will be designed to maximise noise mitigation at the planning stage
- How Venue NSW will manage the noise impacts from events at the sports and leisure precinct on surrounding residents.

The EPA also advised it may have an appropriate regulatory authority role under the *Protection of the Environment Operations Regulation 2009* for outdoor entertainment activities involving 200 persons or more that are carried on lands within the proposed sports and leisure precinct.

As discussed at meeting on 11 December 2014 with EPA and DPE regarding the proposal, the EPA recommends that an acoustic assessment should be undertaken to ensure potential noise conflicts and cumulative impacts are identified and managed appropriately, and used to inform the current rezoning and SEPP. In particular, the assessment should consider how the design and layout of the sports and leisure

precinct and the proposed surrounding land can maximise optimal noise outcomes. The acoustic assessment should also consider how noise from events at the sports and leisure precinct will be managed to minimise impacts on surrounding noise sensitive land uses.

Another key issue that needs to be understood as part of the assessment is documenting current noise management arrangements across the proposed sport and leisure precinct. At this time the EPA understands that Pirtek Stadium (former Parramatta Stadium) has an existing Noise Management Plan that is current to 2016. A copy of this plan should be included with the above acoustical assessment and be reviewed to ensure the plan is adequate and meets current contemporary noise requirements. It should also take into account as best as possible any future plans for types and frequency of events.

The EPA also understands that the current entertainment activities can also extend to the western side of the Parramatta River where open air concerts can occur. While this is outside the study area, it does recognise that the sports and entertainment precinct may be larger than presented in the planning proposal. It also acknowledges that Parramatta City Council also has a key role in the management of noise across this site that should also be investigated and understood as part of the acoustical assessment.

The EPA considers the outcomes of the above acoustical assessment will not only guide noise management associated with the proposed sport and leisure precinct but can also inform the development of specific noise provisions to be included in the *Parramatta DCP* (2011). In this regard, the EPA would like to work collaboratively with DPE, Pirtek and Venues NSW on these matters.

2. WATER QUALITY

The following outcome should be included in the proposed SEPP:

- *To provide a healthy water environment that includes restoring or maintaining the community's uses and environmental values of waterways through the achievement of relevant NSW Water Quality Objectives.*

Matters for Consideration

The EPA recommended in its response dated 29 September 2014 on key study requirements that the following studies should be undertaken:

- *Provide an assessment of any potential impacts of the proposal on the hydrology and hydrogeology of the urban renewal precinct and adjoining areas, with particular focus on water quality*
- *Provide details of, and an assessment of impacts of the proposal on watercourses, wetlands and riparian land on and adjoining the urban renewal precinct.*

A review of the supporting information reveals that no assessment of potential impacts of the proposal on water quality has been provided. In addition no detail or assessment of impacts of the proposal on watercourses, wetlands and riparian land on and adjoining the urban renewal precinct has also been provided. This is particularly important as the project will involve foreshore improvement works along the Parramatta River.

The EPA promotes development that maintains or restores the community's uses and values of waterways (including human and environmental health) through the achievement of relevant NSW Water Quality Objectives (WQO). The EPA considers that an important environmental outcome for the NPUR precinct is ensuring that the WQO developed for the Sydney Harbour and Parramatta River catchment are supported. In particular, Parramatta City Council has recently received an Estuary Management Grant to address key management actions in the Parramatta River.

The EPA considers it important that the proponent provide an assessment of any potential impacts of the proposal on the hydrology and hydrogeology of the urban renewal precinct and adjoining areas, with particular focus on water quality and the community's agreed environmental values and human uses for the relevant watercourses, also known as the NSW WQO.

The EPA also recommended the following plan should also be developed and included as part of the water studies.

- *Provide a concept stormwater management plan outlining the general stormwater management measures for the proposal, with particular emphasis on possible water sensitive urban design options.*

No concept stormwater management plan has been provided. The Planning Report states that stormwater concept plans will be prepared with future development. It also states that future development applications will be required to demonstrate that the proposed water management regimes meet the relevant assessment criteria.

The EPA understands that the Parramatta Development Control Plan (DCP) 2011 provides the general guidelines and standards for stormwater management that will apply for the development of the PNUR area. The PNUR areas will adopt the stormwater treatment targets of the Parramatta DCP, including: Gross Pollutants 90 per cent, Total Suspended Solids 85 per cent, Total Phosphorus 60 per cent and Total Nitrogen 45 per cent. That more appropriate and contemporary pollutant load reduction targets should be derived that reflect the water quality outcomes necessary to support the relevant environmental values of the receiving waterways and reflected in the DCP.

Integrated Water Cycle Management

The EPA encourages development that promotes integrated water cycle management to optimise opportunities for sustainable water supply, wastewater and stormwater management and reuse initiatives where it is safe and practicable to do so.

The EPA considers it important for the proponent to outline opportunities for the use of integrated water cycle management practices and principles to optimise opportunities for sustainable water supply, wastewater and stormwater management across the development.

The *Growth Centres State Environmental Planning Policy* also encourages water recycling and water reuse Initiatives. The EPA supports such initiatives, in particular proposed integrated approaches to managing sewage effluent and stormwater. The EPA also considers that there is considerable scope to apply such initiatives in the development of the urban renewal project.

The EPA recommends that the following provision be included in the Parramatta North Urban Renewal Special Precinct Provisions of the Parramatta DCP 2011. This has been sourced from requirements for other areas that are subject to specific precinct provisions under the Parramatta DCP 2011 (see sections 4.3.3.6 and 4.3.3.7).

Recycled Water

New developments should be connected to a source of recycled or reuse water wherever possible. Recycled/reuse water means treating and using water, such as sewage, stormwater, industrial wastewater or greywater, for non-drinking purposes such as for industry, toilets, cooling towers and irrigation of gardens, lawns, parks and crops.

Sewage Management

The EPA recommended in its response dated 29 September 2014 that details on the preferred approach to sewage management should be documented as part of the planning proposal. While the planning report states that the area is going to be connected to sewage, the EPA recommended the supporting information include details of sewage management and an assessment of any potential impacts on the community's uses and environmental values of waterways and public health.

In general sewage overflows can be a major contributor to diffuse source water pollution in urban environments. New urban developments need to consider the capacity of the existing sewage system to cater for additional load, including whether environmental performance will be compromised by the potential for increased sewer overflows and discharges from existing sewage treatment plants.

In particular, if increased loads of pollution on the receiving environment result from additional sewage capacity there needs to be identification of what practical and cost effective measures can be taken to maintain or restore the community's uses and values of waterways and protection of public health. This would include sewage overflows from any existing sewage pumping stations and discharges from any existing sewage treatment plant. The EPA's policy is that for new systems there should be no pollution of waters as a result of overflows during dry weather and that overflows during wet weather should be minimised.

The EPA recommends that further information should be sought from the proponent regarding the above matters. In addition the EPA also recommends the inclusion of the following note to alert determining authorities and proponents that EPA licensing may be required for the construction and operation of sewage infrastructure

Note: Any development proposing a new sewage treatment system or augmentation to an existing sewage treatment system licensed by the EPA (including construction of sewage reticulation) should investigate whether licensing is required under the Protection of the Environment Operations Act 1997.

3. WASTE MANAGEMENT

The following outcomes should be included in the proposed SEPP:

Provides sound waste management strategies at a local level which are implemented to achieve the NSW Waste Avoidance and Resource Recovery Strategy (WARR Strategy) addressing the waste management hierarchy of :

- *avoidance of unnecessary resource consumption*
- *resource recovery (including reuse, reprocessing, recycling and energy recovery)*
- *disposal*
- *compliments NSW government's Waste Less, Recycle More initiatives and EPA waste and recycling programs.*

Matters for Consideration

The planning report states that waste management will be addressed to satisfy relevant EPA waste management requirements and any requirements of Parramatta City Council. The EPA considers that the NPUR provides an opportunity to enhance and update Parramatta City Council's DCP in relation to the management of waste. This will ensure that new development associated with the NPUR is guided by contemporary information to ensure sustainable waste management outcome. In this regard, the EPA recommends section 3.3.7 of Parramatta DCP be updated to include the following provisions:

- *Any waste generated during demolition and construction needs to be classified in accordance with the EPA's Waste Classification Guidelines and managed in accordance with that classification*
- *Waste management planning for the new development needs to consider the State Plan targets for waste reduction and resource recovery, along with any regional waste management strategies.*

In addition, the EPA recommends the Notes associated with the DCP provisions include the following under guidelines to assist the development of waste management strategies:

- *The Better Practice Guidelines for Waste Management and Recycling in Commercial and Industrial Facilities (EPA, December 2012). This guide can be accessed at: <http://www.epa.nsw.gov.au/warr/BPGuideCIFacilities.htm>.*
- *The Better Practice Guide for Multi-Unit Dwellings provides waste management strategies for multi-unit residential developments (DECC 2008). This guide can be accessed at: <http://www.epa.nsw.gov.au/warr/BetterPracticeMUD.htm>; and*
- *The Better Practice for Public Place Recycling (DEC 2005) provides information on standards for recycling systems in public places, such as parks, shopping centres, footpaths, bus-stops, etc. This guideline can be accessed at: <http://www.epa.nsw.gov.au/warr/publicrecycling.htm>.*

4. CONTAMINATED LAND MANAGEMENT

The following outcomes should be included in the proposed SEPP:

To ensure land contamination is assessed and managed so that the land is suitable for its proposed use and that the contamination does not present an unacceptable risk to human health or any other aspect of the environment.

Matters for Consideration

The proposal involves the rezoning of some areas of land from B6 "Enterprise Corridors" to B4 "Mixed Use". This change will provide an opportunity to integrate suitable business, office, residential, retail and other development in accessible locations so as to maximise public transport patronage and encourage walking and cycling.

However the B4 Mixed Use Zone permits a range of sensitive activities including boarding houses, child care centres, educational establishments, information and education facilities, medical centres and respite day care centres.

The supporting information states that past activities at the site have had a potential to result in site contamination. These include:

- historical and current fuel storage and dispensing infrastructure in several portions of the Cumberland Precinct site
- hazardous building materials formerly or currently located within site structures in portions of the two precincts, including asbestos containing material (ACM) and lead paint
- potentially impacted fill material and waste products which may have been used to create current site levels, including areas of previously identified ACM impacted fill material in the vicinity of Parramatta Stadium
- historical use of portions of the Cumberland precinct for food production, including market gardens, orchards, vineyards, etc
- storage and use of dangerous goods associated with various industrial operations at the site including a public works depot, facilities maintenance, vehicle maintenance, laundry operations and grounds keeping
- applications of pest control chemicals including OCPs and OPPs during site maintenance activities within recreational open spaces, particularly including the sports ovals and areas adjacent to the river
- stockpiles of waste materials identified in various portions of the Cumberland precinct
- fire damaged buildings within the Cumberland Precinct
- potential for migration of contamination onto portions of the site as a result of fuel storage facilities located on adjoining upgradient commercial/industrial sites.

It also states that the potential contamination is unlikely to be of such a scale or occurrence that common remediation and/or management techniques could not render the site suitable for the proposed uses. As such, the potential for contamination to occur at the site is considered not to represent a significant barrier to the future development of the site.

The Planning Report states that any further consideration of SEPP 55 will not be required as the proposal involves no additional sensitive land uses other than those already permitted. In addition the need for further detailed assessment on land contamination issues will be undertaken as part of future development applications under Part 4 of the Environmental Planning and Assessment Act 1979.

The EPA considers that B4 "Mixed Use Zone" allows for a range of sensitive activities where the requirements of SEPP 55 must apply. In particular SEPP 55 states:

- *land that is within an investigation area*
- *land on which development for a purpose referred to in Table 1 to the contaminated land planning guidelines is being, or is known to have been, carried out*

- *to the extent to which it is proposed to carry out development on it for residential, educational, recreational or child care purposes, or for the purposes of a hospital-land:*
 - *in relation to which there is no knowledge (or incomplete knowledge) as to whether development for a purpose referred to in Table 1 to the contaminated land planning guidelines has been carried out*
 - *on which it would have been lawful to carry out such development during any period in respect of which there is no knowledge (or incomplete knowledge).*

In addition the EPA recommends that section 2.4.4 of the Parramatta DCP 2011 should be updated to ensure that it provides guidance on current contemporary contaminated land information and regulatory requirements. In particular, the EPA recommends that the note under section P1 be replaced with the following new provision:

In cases where land is potentially contaminated, the investigation and any remediation and validation work is to be carried out in accordance with the guidelines made or approved by the EPA under Section 105 of the Contaminated Land Management Act 1997 and be in accordance with the requirements of State Environmental Planning Policy 55 – Remediation of Land.

As per SEPP 55, the EPA recommends that a Contemporary Contamination Land Assessment should be undertaken as part of any land use change process to inform future land use. If historical information suggests that activities have been undertaken in the past that has caused site contamination, the EPA recommends that council consider the involvement of an EPA-accredited site auditor during the contamination management process, including the provision of a Site Audit Statement certifying that the land is suitable for the proposed use(s).

**The National Trust of Australia (New South Wales)
Policy on NSW Planning System (Heritage Issues)**

Preamble

Since the proposed introduction of planning legislation in 1979 (the Environmental Planning & Assessment Act) the National Trust has consistently lobbied for improvements for heritage protection in the planning system. Almost all heritage is dealt with by local government, not under NSW Heritage legislation.

In March, 2012 the National Trust made a submission to the NSW Planning System Review Issues Paper (the Green Paper) arguing that there was a major imbalance in the planning system favouring development over reasonable expectations that heritage would be protected. The NSW planning system failed to provide proper heritage protection for both listed heritage places and places of heritage significance that hadn't yet been formally identified. There would be many places/items of heritage significance which are not presently included on heritage lists. No heritage list is definitive. The Trust also noted that NSW planning and environmental legislation should protect environmental assets including heritage places, not only to provide for new development, but because heritage places are a non-renewable resource supporting jobs and investment through heritage trades and tourism, as well as enriching our environment and contributing to our culture and sense of place.

In a June 2013 submission on the NSW Government's Planning White Paper and Exposure Planning Bill and in representations to the State Government, the Trust stressed the need for a NSW Planning Policy for Heritage, expressed concern at the removal of third party appeal rights, the lack of protection for Conservation Areas and the absence of initiatives for improving heritage protection.

The National Trust has argued that only merit assessment (not code assessment) should be allowed for development applications affecting heritage listed items and Heritage Conservation Areas. In a December 2013 submission to the Planning Assessment Commission, the Trust expressed its concerns at modifications that are made to development consents if a development is State Significant Development. Developers use a modification procedure to put substantial modifications, where less rigorous assessment and less rigorous exhibition requirements apply. Effectively submitting entirely new development applications, these modifications effectively subvert the exhibition and assessment process in the planning legislation.

Policy

1. The National Trust will argue for provisions in the planning system to better protect places of recognised heritage significance and for the adequate staffing of the Department of Planning with heritage professionals.
2. The National Trust will strongly oppose the use of Code Assessment for developments affecting places of recognised heritage significance.
3. As with the federal Environmental Protection and Biodiversity Conservation Act the Trust will argue that the NSW Planning System should provide for the protection and conservation of heritage (A NSW Heritage Policy), and should enshrine the principles of ecologically sustainable development and inter-generational equity and the precautionary principle.
4. The National Trust believes that "sustainable development goals" should be based upon the three equal pillars of 1) environmental protection; 2) social development; and 3) economic development and that the economic pillar must not be treated as paramount, to the detriment of social equity and the safeguarding of our natural world for future generations.
5. The National Trust, noting that developers seek certainty in the planning process, calls for "confidence" for both the community and developers through ensuring that planning and development decisions are transparent and not unfairly, unduly or illegally influenced.
6. Though difficult to assess, the Trust will continue to recognise social significance, and encourage all levels of government to do so as well. While there will be inevitable changes and heritage places will be adapted for new uses and needs, the Trust will strongly oppose forced evictions of communities which impact on social heritage significance values.
7. The Trust will continue to argue that State Significant Development must not switch off Heritage & Environment Protection Legislation nor allow major new developments to be dealt with as modifications to an existing approval.

Ms Carolyn McNally
Secretary
Department of Planning & Environment
GPO Box 39
SYDNEY NSW 2001

Dear Carolyn

Re: North Parramatta Urban Renewal Plan.

Thank you for the opportunity to make the following submission regarding UrbanGrowth NSW's North Parramatta Urban Renewal Plan.

I have grave fears that the Plan as presented will have a devastating impact on what has to be the most significant heritage precinct in Australia. The reasons for my concerns are outlined below.

- The proposal places undue development pressures on the landscape and heritage of an area that will be much needed for open space for the increasing Parramatta population in coming decades.
- The area outlined in the Plan has been predominantly public land since early European settlement and its continued management and control should remain as an integrated precinct that is managed by a single government agency to ensure the long term survival, co-ordinated maintenance, conservation and presentation of this state and nationally significant cultural landscape.
- That the declaration of the project as one of State Significance removes the Heritage Council from the decision making process. If there was ever a situation where the Heritage Act and its operational authority were necessary to protect and preserve our national heritage, surely this is it. Only the proper involvement of the NSW Heritage Council in the decision-making process will produce a worthwhile development for the people of Parramatta, the State of New South Wales and the Australian Nation.
- The scale and quantity of development proposed is contrary to the principles and guidelines provided in the Conservation Management Plans prepared for the NSW Heritage Council in conjunction with the State Heritage Register Listings.
- That the excessive development indicated in the concept drawings will become even more intensive given the past history of the Parramatta City Council for increasing building heights following subsequent applications after the initial approvals.
- Given the location, heights and density of buildings outlined in the proposal I vigorously oppose:
 - the construction of new multi-storey buildings in the Female Factory precinct
 - the construction of 16 storey buildings directly adjoining the Recreation Hall, Chapel and Parramatta Gaol
 - the construction of 4, 6 and 8 storey mixed use developments in Parramatta Park along O'Connell Street
 - the demolition of the highly significant residence of the Chief Attendant, 9 Fleet Street.
- That in addition to the points above it is essential that the Central Male Block which has a heritage value of "high significance" be retained.
- That parking provisions are inadequately addressed in the proposal and before any rezoning is contemplated a detailed analysis undertaken so that the full implications this issue are placed into the public domain.

- That the photomontages presented in the proposal appear to be very misleading and understate the impact on viewlines and values of the World Heritage Listed Old Government House and Domain

- That the proposal does not adequately address Aboriginal heritage, cultural and landscape perspectives and therefore further involvement of the Aboriginal community in decision making regarding this project be undertaken.

In conclusion, whilst I support the principle of sensitive adaptive re-use of heritage buildings, so as to provide for their ongoing heritage conservation and presentation, the lack of the necessary controls and management of such measures is not adequately assured in this proposal and until such is provided I cannot support its endorsement.

Yours sincerely



Name *Gunther Kaindl*
Address *25 Johnston Road, Sydney 2016.*

Anna Johnston

From: terry o'brien <aterryig@outlook.com>
Sent: Wednesday, 17 December 2014 3:28 PM
To: information-Planning
Subject: Response to Proposed Planning Controls Parramatta North.

From Mr T.I.O'Brien
76 Pennant Hills Rd
North Parramatta. 2151. 19th December 2014
email aterryig@outlook.com
To whom it may concern.

Primary concerns are that:

(a).Time for consideration of the massive amount of “supporting” studies is too short.
(b)With timeline of 15-20 years, a broader Regional consideration including whole of Dept of Health complexes at Westmead and Cumberland ought be included instead of restriction to two precincts.
© High Density zoning permitting max heights Y1,Y2, AB1,3 are excessive for the relative flat terrain.
(d)Traffic Assessment, although extensive, concludes that “the traffic impact of the proposed development (in the two precincts) could be mitigated by the list of traffic measures described in the report.”
The need for two additional lanes in Church St between Factory St and Grose St, (in effect to Victoria Rd) due to this rezoning and development alone, requires intense consideration on a Regional basis particularly as Council and RTA abandoned a large length of the previous road widening scheme in earlier reconstruction.

Re (a) It was not made clear in the public area publicity that the formal submission closing one month after exhibition was to be concentrated on proposed planning and zoning changes on existing planning controls. Ramifications to be gleaned by the general public affected by these proposed changes can only be gleaned by close examination of massive amounts of subsections in the detailed report , much of which I suspect would be beyond the interest of most of the population except developers and their companies.

Re (b) and ©Contours of the subsection of part of Parramatta Park precinct, west of the rail line in the south western corner , between Amos, Good , Pitt and Park Parade,would be eminently suited to the high density and building height proposed between Albert and Fennell. Access to the Westmead complexes , transport etc as well as Parramatta. Development along the skyline contours would still allow continued use of the driving range It would substantially reduce the number of 5,600 dwellings proposed in the Cumberland precinct and reduce the consequential traffic effects generated by these current proposals. The broader consideration ought take into account the impact on existing zonings in North Parramatta to the east of O'Connell St, shadows etc as well as Old Kings sub precinct and a current DA on the corner of O'Connell and Victoria.

T.I.O'Brien



Office of
Environment
& Heritage

Our reference: DOC14/278368
Contact: Felicity Barry 9995 6914
Rachel Lonie 9995 6837

Mr Michael File
Director Urban Renewal
Planning and Environment
GPO Box 39
Sydney NSW 2001

Dear Mr File

Further advice to a letter from the Office of Environment and Heritage (OEH) dated 19 December 2014, is provided as follows, specific to Aboriginal Cultural Heritage Matters relevant to the exhibition of the Parramatta North potential State Significant Site. This advice follows OEH's recent discussion with the Department concerning the level of Aboriginal Community Consultation and the need for a clear understanding of the heritage values of the sites in question in order to guide the planning proposal.

OEH currently does not have any guidance material specific to the preparation of planning proposals for Aboriginal Cultural Heritage nor expressly for the level of Aboriginal Community Consultation that is appropriate for this stage of the planning process. The *Aboriginal Cultural Heritage Consultation Requirement for Proponents, 2010 (Guidelines)* provide guidance for an Aboriginal Heritage Impact Permit (AHIP) under the *National Parks and Wildlife Act 1974*, where harm will occur to an Aboriginal object or Place.

OEH understands that some limited Aboriginal community consultation has been undertaken to inform the current planning proposal with respect to Aboriginal cultural heritage matters. However this consultation has been targeted to four (4) Aboriginal groups, including the Land Council and three others who regularly work in Western Sydney and Parramatta Local Government Area as well as Council's Advisory Committee. The OEH list of Aboriginal stakeholders who have registered an interest in the Parramatta area specific to the above *Guidelines* includes some 36 Aboriginal groups. The list of Aboriginal stakeholders is provided to Applicants preparing AHIPs, in accordance with the *Guidelines*. For this reason and for privacy reasons OEH cannot supply a copy of this list directly to the Department for this project.

Ultimately the intention of these guidelines is to ensure inclusivity of the views of Aboriginal people for projects that concern elements of their cultural heritage. The OEH guidelines seek specifically to identify members of the Aboriginal Community who may have an interest in an area and to seek their views about the proposed development. By targeting the consultation to a limited group of people, the project has not, in OEH's opinion provided the broader Aboriginal community with the opportunity to comment on this project: comments and views that may not be captured by the limited group.

A lack of response in the form of submissions from the Aboriginal groups included in the consultation process does not negate the importance of informing the Aboriginal community more broadly. A good example of the importance of early and extensive consultation in a project is evident in a recent AHIP application within the Blue Mountains. In depth Aboriginal community liaison and consultation occurred

during and throughout this project in accordance with the *Guidelines*. Specific comments from the Aboriginal community members both to the project manager and to OEH since that time have expressed appreciation of the opportunity to be advised of the project and that their opinions were specifically sought and considered. That did not necessarily equate to a specific submission being made for that project by one or more of these individuals/groups.

A key reason for ensuring that the Community consultation is more inclusive for this particular project is that the existing Aboriginal Archaeological Assessment (AAA) prepared by Comber Consultants has identified that there are relevant high contemporary heritage values for the Aboriginal community within the Parramatta North site. This was particularly expressed for the Cumberland East Precinct and Sports and Leisure Centre Precincts in the AAA. For example, the Norma Parker Centre/ Kambala was the site of the detention and separation of Aboriginal and other members of the community from their families and children. While OEH understands from discussions with the Department that more in-depth consultation with other representative groups with respect to the Norma Parker Centre and Kambala have been undertaken, this has not necessarily captured the views, opinions and feelings of the Aboriginal community regarding the appropriateness of any proposed activities and future uses of these areas with respect to the contemporary heritage values of these sites and places. Aboriginal cultural heritage is not specific to seemingly more distant archaeological evidence and these values are not necessarily identified and appropriately investigated in other "historic" heritage studies. OEH therefore argues that there is real value in appropriately understanding the significance values of these places to Aboriginal people as well as the broader community at the planning proposal stage and not deferring this to a later stage of the proposal.

The early identification and understanding of the heritage values present within the Parramatta North site is recommended to inform the planning proposal stage. This type of early investigation is important to guide the planned uses and rezoning of the land. Once the process passes this stage and is deferred to the DCP/DA stage there is little or no chance of any conservation options for Aboriginal cultural heritage, irrespective of the archaeological and contemporary heritage significance of the land.

Should you have any queries in regard to this correspondence please contact either Rachel Lonie on 9995 6837 or Felicity Barry, Archaeologist on 9995 6914.

Yours sincerely,

S. Harrison 02/04/15

SUSAN HARRISON
Senior Team Leader Planning
Greater Sydney
Regional Operations



**Office of
Environment
& Heritage**

Our reference: DOC15/37948
Contact: Rachel Lonie 9995 6837

Mr Michael File
Director Urban Renewal
Planning and Environment
GPO Box 39
SYDNEY NSW 2001

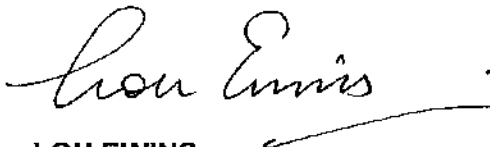
Dear Mr File

Reference is made to your correspondence dated 4 February 2015 regarding consultation in accordance with Section 34A of the *Environmental Planning and Assessment Act 1979* of the Parramatta North potential State Significant Site.

The Office of Environment and Heritage (OEH) provided comment on biodiversity issues associated with this proposal in its submission dated 19 December 2014. Additional comments are provided at Attachment 1 pursuant to the Section 34A.

Should you have any queries in regard to this correspondence please contact Rachel Lonie on 9995 6837 or by email at rachel.lonie@environment.nsw.gov.au.

Yours sincerely

 17/2/15

LOU EWINS
Acting Regional Manager, Greater Sydney
Regional Operations

Enclosure: Attachment 1 – Office of Environment and Heritage (OEH) response on Section 34A consultation for North Parramatta potential State Significant Site

ATTACHMENT 1. Office of Environment and Heritage (OEH) response on Section 34A consultation for North Parramatta potential State Significant Site

1. Grey-headed Flying Fox Colony

OEH re-iterates its concerns regarding the proximity of the proposal to the Grey-headed Flying Fox (GHFF) camp and notes that this will create conflict with future residents. Conflicts between GHFF and residents are real and expensive to address, as OEH's experience with existing GHFF colonies that are located close to residential areas demonstrates. Conflicts arise as a result of noise and odour impacts and the perceived and potential health impacts of GHFFs. By far the best strategy is to avoid creating the conflict in the first place, which can be achieved by creating an appropriate buffer between residents and the GHFF colony.

In reviewing the documents provided, OEH notes that the only diagram that appears to overlay the location of the GHFF camp and the proposed development is labelled *Key constraints* in the Summary Report (November 2014). The diagram titled *Proposed built form controls* in the Summary Report shows a new 3 storey building in the area of the GHFF camp and a further new 3 storey building and a new 4-6 storey building close to the camp in the area labelled F7.

OEH accepts that a 300 m buffer between residents and the GHFF camp at this location is not practical; however the proposal does not appear to provide for any buffer. OEH has recommended that a buffer of at least 20 metres (preferably vegetated with tall, fragrant, non-roost trees) be provided between GHFF habitat (including proposed regeneration areas) and future development areas. OEH also supports increasing the width of potential habitat through regeneration and recreation of the River-flat Eucalypt Forest as described in the Environmental Management Plan (EMP), noting however this is likely to exacerbate conflicts with GHFF as it will bring habitat closer to the development areas and over a wider area.

OEH supports the recommendation made by Parramatta City Council in its submission on the proposal to relocate buildings away from the open space areas in order to reduce current and future environmental health conflicts with the GHFF camp. OEH also supports Council's recommendation that the GHFF camp area be included in the *Natural Resources – Biodiversity Map* in the Parramatta Local Environmental Plan 2011.

OEH considers any remnants of the endangered ecological community, River-flat Eucalypt Forest (RFEF), should be retained and impacts on this community avoided. The current proposal does not meet the setbacks required by the NSW Office of Water under the *'Guidelines for riparian corridors on waterfront land'*. OEH considers the areas required as a setback should not include buildings, carparks or other infrastructure, but should retain, regenerate and replant RFEF where possible.

A potential new pedestrian/cycle bridge is shown bisecting the GHFF camp. OEH strongly recommends that no pathways are constructed through the GHFF camp area. The Landscape Plan shows a 'heritage terrace' element within the GHFF camp. Again, the location of this should be reconsidered to avoid the camp and future GHFF conflicts and impacts.

2. River-flat Eucalypt Forest

As noted in the previous submission, Section 18.3 of the Planning Report suggests that an asset protection zone (APZ) will not be required between areas of existing and regenerated River-flat Eucalypt Forest and development areas. OEH notes there is no discussion of an APZ in the Ecological Assessment or the EMP. If an APZ is required in future, an assessment will need to be undertaken of the impact of the creation and maintenance of the APZ, on the River-flat Eucalypt Forest and potentially the GHFF camp.

Future consideration of threatened species matters will be required as the proposal is developed and impacts such as loss of hollow bearing trees and GHFF feed trees are better understood. As noted previously, future surveys of the buildings will be required for threatened microbats. It will be important that thorough surveys are undertaken by a suitably qualified ecologist prior to destruction of any buildings that may contain roosts.



Office of
Environment
& Heritage

Our reference: DOC14/278368
Contact: Rachel Lonie 9995 6837

Mr Michael File
Director Urban Renewal
Planning and Environment
GPO Box 39
Sydney NSW 2001

Dear Mr File

Reference is made to your correspondence dated 19 November 2014, regarding the exhibition of the Parramatta North potential State Significant Site.

The Office of Environment and Heritage (OEH) provides comments on biodiversity, Aboriginal cultural heritage and flood risk management in Attachment 1.

Should you have any queries in regard to this correspondence please contact Rachel Lonie on 9995 6837 or by email at rachel.lonie@environment.nsw.gov.au

Yours sincerely

S. Harrison 19/12/14

SUSAN HARRISON
Senior Team Leader Planning
Greater Sydney
Regional Operations

ATTACHMENT 1

Office of Environment and Heritage (OEH) comment on North Parramatta potential State Significant Site

1. Biodiversity

OEH is very concerned that the proposal's proximity to the Grey-headed Flying Fox (GHFF) camp will create future conflicts with residents. A number of GHFF camps in Sydney which are adjacent to residential areas are currently under threat of dispersal. It is unclear why discussion of such a potentially significant impact is not discussed in the Ecological Assessment, but is included in the Ecological Management Plan (EMP). OEH agrees with the statement in section 4.1 of the EMP, that a 300 m buffer between residents and the GHFF camp at this location is not practical, however the proposal does not appear to provide for any buffer. Furthermore, while OEH supports increasing the width of potential habitat through regeneration and recreation of the River-flat Eucalypt Forest (as described in the EMP), this is likely to exacerbate conflicts as it will bring habitat closer to the development areas and over a wider area.

Section 4.1 of the EMP states that conflicts will be minimised by the existing brick wall. However, OEH does not consider that the brick wall (which appears to be approximately 2m high), will sufficiently address the conflict issues, as both the roosting height and the proposed building height (either 13m or 22m as maximum height, according to Figure 10 in the Planning Report) will be significantly higher than the wall. Section 4.1 of the EMP also states that the majority of higher yield residential dwellings have been situated further away from the camp boundaries. However, OEH does not consider that any development in close proximity to the camp is appropriate. A buffer of at least 20m (preferably vegetated with tall, fragrant, non-roost trees) should be provided between GHFF habitat (including proposed regeneration areas) and development areas.

The surveys that were undertaken for threatened microbats did not include surveys of the buildings, which can occasionally be used by microbats as roosts. It will be important that thorough surveys are undertaken by a suitably qualified ecologist prior to destruction of any buildings that may contain roosts.

Section 18.3 of the Planning Report suggests that an asset protection zone (APZ) will not be required between areas of existing and regenerated River-flat Eucalypt Forest (RFEF), and development areas. OEH notes there is no discussion of an APZ in the Ecological Assessment or the EMP. If an APZ is required in future, an assessment will need to be undertaken of the impact of the creation and maintenance of the APZ, on the RFEF and potentially the GHFF camp.

Section 4.1 of the EA states that 'the shared path will be constructed outside of the GHFF camp boundary', however, Figure 16 of the Planning Report shows a 'proposed shared way' through the area where the GHFF camp is located. OEH recommends that no pathways are constructed in this area.

OEH notes that the 'bat colony' on Figure 15 of the Planning Report is a smaller area than the map of the GHFF camp in Figure 5 of the Ecological Assessment.

2. Aboriginal Cultural Heritage

OEH has reviewed the *'Parramatta North Urban Renewal Cumberland East Precinct and Sports & Leisure Precinct Aboriginal Archaeological & Cultural Heritage Assessment'* prepared by Comber Consultants for Urban Growth NSW (October 2014) and can advise the following.

In broad terms the archaeological assessment has provided an adequate consideration of the pre-contact archaeological potential likely to exist within the North Parramatta Urban Renewal Precincts (NPURP). It has provided a detailed discussion of early occupation and interactions of Aboriginal and non-Aboriginal people within the broader Parramatta area and township south of the Parramatta River.

However, relevant discussion of post-contact land use and disturbance within the precincts should be incorporated from the Historical Archaeological assessment undertaken for the NPURP. This should be used to guide any program of test excavation of the potential and likely Aboriginal archaeological resource across all precincts which are likely to be developed.

The Aboriginal community consultation undertaken is insufficient in its current form. It does not comply with the OEH Guideline *Aboriginal Cultural Heritage Consultation Required for Proponents 2010*. In addition, the consultation has not adequately considered the cultural and social significance of all the precincts to the Aboriginal community in order to inform the development planning for these precincts. In particular, consultation was not undertaken for the Sport & Leisure and Cumberland precincts. Many of the built heritage items within the precincts will retain multiple significance values within the broader NSW community which are likely to encompass values to the Aboriginal community, including contemporary experiences which are relevant to understanding and interpreting these histories.

OEH supports the recommendations of the Aboriginal community consulted who have identified high cultural and social values associated with Parramatta Park and in particular have highlighted the importance of ensuring:

"Parramatta Park (is) maintained as green open space for recreational purposes. They would also like to ensure that view lines to and from the park are maintained and that high density, high rise development does not occur on the boundaries of the Park" (AACHA 2014:16)."

OEH notes that this consultation also identified the value in ensuring the reduction of development heights in proximity to Parramatta River and the inclusion of a riparian corridor along the River-frontage. OEH also draws attention to the implications of any encroachment of development within these open space areas for activities which may cause harm to Aboriginal archaeological objects within these areas such as service installation and pathways.

OEH recommends the following key areas that need to be addressed prior to finalising the development design for this planning proposal:

1. There is a need for further Aboriginal community consultation in accordance with the OEH Guideline *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010*;
2. The views of the Aboriginal Community should be incorporated into the results of the development design and subsequent interpretation plans for the NPURP project.
3. Further research and documentation of the social and cultural heritage values of sites within the Cumberland East Precinct and Sports and Leisure Centre Precinct should be included into the Archaeological Assessment;
4. Information on post-contact land use and disturbance from the Historical Archaeological assessment within the precincts should be incorporated into the Aboriginal assessment. This should assist interpreting the survival of Aboriginal archaeological evidence across the development precincts and guide any testing program prepared;
5. An Aboriginal Heritage Impact Permit (AHIP) will be necessary to undertake test excavation and geotechnical boring as these activities are not excluded from the definition of harm as specified by Requirement 14 of the *Code of Practice for Archaeological Investigation in NSW (2010: p24-25)*: '*in areas known or suspected to be conflict or contact sites*'; and
6. Testing should be undertaken well in advance and inform the development design of the precincts.

OEH understands that test excavation is currently proposed for historical archaeology within the first quarter of 2015. OEH recommends that it would be advisable to have an AHIP application approved prior to commencing any historical archaeological testing program to avoid delays during this program should Aboriginal objects be identified during these works. In order to obtain an AHIP for testing approved development consent is not required, however Aboriginal community consultation must be undertaken in accordance with the Guidelines specified in Point 1 above and appropriate documentation in accordance with the *Applying for an Aboriginal Heritage Impact Permit: Guide for applicants (2010)*'.

7. Flood Risk Management

OEH previously recommended that the most appropriate method to assess the development of flood prone land is through the floodplain risk management process which is detailed in the NSW Government's *Floodplain Development Manual* (2005).

OEH recommended that a flood assessment should be undertaken in consultation with Parramatta Council and comprise:

- the impact of flooding on the proposed development and any flood risk to people and properties for the full range of the floods up to the probable maximum flood (PMF) event including potential long term cumulative impacts from staged development. This assessment should address any relevant provisions of the NSW Floodplain Development Manual (2005) including the potential impacts of sea level rise and increases in rainfall intensity due to climate change.
- details of the drainage associated with the proposal, including stormwater drainage infrastructure. The proposal should address the impact of stormwater flows on the site from other catchments, overland flow paths and mainstream flooding.
- an assessment of any possible impact of the proposed development on the flood behaviour (i.e. levels, velocities and duration of flooding) and the impact of the proposed development on adjacent, downstream and upstream areas.
- an assessment of the impacts of earthworks and filling of land within the proposed development. This assessment should be based on an understanding of staging development and cumulative flood impacts.
- a detailed emergency response plan for floods up to the PMF level. This plan should also include shelter-in-place arrangements, an adequate assessment of isolation possibility and the impacts from the proposed development on the capacity or operation of existing local evacuation routes.

OEH notes that these recommendations have not been taken into consideration.

(END OF SUBMISSION)

GlendaGartrell

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18 December 2014-12-18

Sydney Metropolitan Plan

I wish to register my very strong objection to any plan which threatens Colonial foundation heritage items like the Parramatta Female Factory Precinct. We are the only nation which can trace its history from its origins and document it.

Along with our convict indents, these buildings deserve recognition of the role they played in housing, employing and providing for women in the very early days of white settlement. These are the very structures which will bring later generations as well as visitors to our shores, as visitors to the Parramatta area.

These buildings help modern communities begin to understand the way people and women in particular, lived and worked in early colonial times. They say such a lot about the skills and talents of the governor and the workforce at the time. To see these buildings standing free in their original precinct inspires the awe and respect we owe to our pioneer ancestors.

Visitors from urban centres in the northern hemisphere – especially the larger cities of Europe and Asia – all marvel at the space we have preserved even in Sydney, the most crowded city of Australia. Our few surviving heritage buildings deserve to also be afforded space to set them off and complement them for the grandeur they once represented.

Please do not crowd them in with high rise buildings which bear no relationship to the origins, purpose, style and significance of the Female Factory buildings.

The artist impression of what could be achieved by annexing so much of the park space around the Female Factory as to render them impossible to view at a distance, is an awful picture. It would be worse at ground level, the only view which all future visitors would have of our precious heritage.

Glenda Gartrell



PARRAMATTA FEMALE FACTORY

PLAN FOR THE FUTURE

AN OVERVIEW



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Incorrect Historical Information

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PARRAMATTA FEMALE FACTORY FRIENDS - ABOUT US

The Parramatta Female Factory Friends has grown out of community action to protect, conserve and bring the Parramatta Female Factory to all Australians. We do this through advocacy, site monitoring, female factory research, tours, talks, education activities and celebrations. We welcome anyone to join us who shares the same aims as in our charter which is to:

1. Protect, preserve and conserve the site and all its provenance according to the Burra Charter.
2. Advocate for the Female Factory Precinct for UNESCO World Heritage Site Status.
3. Ensure that the precinct is listed and remains on local state and national heritage registers.
4. To work in conjunction with other organisations for major future planning and strategic opportunities, in particular, those responsible for companion sites such as the Parramatta Gaol, Parramatta Park Old King School and the Roman Catholic Orphanage.
5. Advocate the establishment of a joint state and national statutory authority as custodian and manager who will:
 - a) Develop and manage the Parramatta Female Factory Precinct as a cultural, tourism and learning place of international significance.
 - b) Manage, conserve, interpret and promote this site for the people of Australia in accordance with the guidelines of the Burra Charter and at the highest possible professional standard.
 - c) Raising awareness of the value of and risks to the Female Factory site.
 - d) To undertake and promote historical research in order to share the historical value of the two sites and to pass on the heritage of this irreplaceable site to future generations.
 - e) To manage and promote the site in spirit of equality as a meeting place where all can access, share and understand our history and our Australian identity, past and present.
 - f) To provide staff and budgets to conserve and maintain the site in accordance with 5. a-e



PARRAMATTA FEMALE FACTORY STATUS AT A GLANCE

The Parramatta Female Factory commenced in 1818 is not on the National Heritage List and is worthy of a world heritage site status. This historic Governor Macquarie commissioned and Greenway designed site is the earliest female convict site still in existence and is older than all but three World Heritage Convict Sites in Australia. Over 9,000 female factory women - approximately 1 in 5 Australians related to these women. It is a part of all Australian's identity, our children's heritage.

This site holds the stories of the women, men and children -stories of hardship, migration, survival, winning against the odds and going on to become the mothers, teachers, farm workers and businesswomen of the nation. Through their lives they have become the silent revolution as the mothers, sisters, aunts, grandmothers, friends that contributed to the change in colonial thinking to what we know now as Australian values including: fairness, mateship, sense of humour, survival and making the most of life and opportunity. The stories have resonance today and can provide experiences that can spark meaningful connection and change for individuals.

The Parramatta Female Factory Site needs to be protected, preserved, conserved, interpreted historically and made accessible to all Australians present and future through World Heritage Site Status.

The Parramatta Female Factory Site includes the Convict Female Factory site footprint which is the 1818 Governor Macquarie site, the 1820s Governor Brisbane third class additions and the Governor Gipps courtyard and cells additions.

There are less than 15 objects identified nationally directly related to the factory period and only two images of factory women. This means that apart from government records there is very little material culture relating to the half a century of female factory experience of which 44 years were in Parramatta.

This site needs to be preserved intact in its entirety, just as it is with Port Arthur and Hyde Park Barracks. The architecture and architectural elements are of critical historical value.



Future reuse of the Parramatta Female Factory site is of critical importance to all Australians, historically and in relation to our current identity and values.

OUR VISION

The Vision for the Parramatta Female Factory is a World Heritage site which acknowledges its past and evolving history and meaning as the most significant convict female site still in existence. Intrinsic to this is access for all to the identity, history and meaning that makes the Parramatta Female Factory a key aspect of Australian history and identity.

VISION IN ACTION

NARRATIVE

The narrative of this site would respond to the following themes:

- Site of Conscience - Forced Migration, experiences of the women
- Convict Female Factory History – focus on Parramatta with context of 13 Female Factories phenomena
- The Factory Site – Original use - Aboriginal life, an architectural masterpiece of the early Colony – Macquarie commission and evolution through the visions of Government Architects from Greenway to Liberty Vernon
- Factory as site of early Colonial Industry and life of the workers - including Colonial business, production, work methods, technology, work environment, workers actions
- Earliest Female Health Service – hospital for the Colony
- Daily Life
- From Depot to distant places – assignment from the factory to all parts of the Colony
- Ordinary Lives, Extraordinary Circumstances – from thief to luddite to political dissident – exploring the lives of the factory women and staff
- Traces of our history – objects and archaeology of the site
- Australian Identity – female factory contribution to the Australian identity, meaning now



COMMUNITY AND VISITOR EXPERIENCE AND AMMENITY

The plan for the site would be access for all. This means access for local community, leisure visitors, national and overseas visitors and focus on learning centred visitation – schools, tertiary and lifelong learning.

This would not be a static museum. The focus is on experiential, interactivity, engagement – hands on history – the sheer pleasure of walking in the footsteps of Australia's ancestors. It would be a national centre for discovery, curiosity, pleasure and learning. The buildings and activities within would enhance the telling of the significant histories. There would be a national resource and information centre responding to: site of conscience (evolution of ethics and values history in Australia to which these women made significant contributions), migration, women's history, family history, Colonial social, architectural, legal, nursing history and archaeology, workers history.

Also included a place for dialogue – a resource where seminars, workshops, lectures, conferences could be held. A place where tourism and education visitation could be enacted. A place for study at all levels ranging from curiosity or personal interest and creative responses (visual, performance, literary) to academic research and writing.

LOCATION AND RELATED SITE CONNECTIVITY

The Parramatta Female Factory site is in the heart of the North Parramatta Historic Precinct both physically and historically. It came after Government House and before the Parramatta Gaol and the Roman Catholic Orphanage (later Girls Industrial School and Norma Parker Centre). It is ideally placed for access from Parramatta Park, Parramatta River foreshore and Fleet Street and could be inclusive of any pedestrian trails through these areas. The river and road access are significant historic viewing corridors. Historically it has the governance connection with Old Government House, the sister site connection with Parramatta Gaol and the children of the Irish Convict Factory Women were placed in the Orphanage from 1840. As there is open space and car parking areas currently adjacent (north east) of the footprint there is also opportunity for camping and 'glamping' for accessible pricing accommodation for education and tourism visitors).



ACTIVITY HUB

The use of the site that is the female factory footprint would provide indoor and outdoor leisure activities. Indoors would include interactive interpretation experiences, visitor amenity (coffee shop and value add historic information and product area), resource centre for discovering the subjects identified above as a national resource and information centre. Indoor creative pursuits, dialogue and workshop opportunities. Outdoors would include spaces for picnics, outdoor school and tour guiding experiences, performances, art workshops (outdoor drawing and painting), commemorations, festivals and fairs as well as a specifically identified location (likely Gipps Yard for reflection as a site of conscience (perhaps reflective garden based around historic plantings)).



SITE INVIGORATION

The Parramatta Female Factory Site for many years has been largely unavailable for all Australians. Access has been subject to special permissions. The Parramatta Female Factory Friends vision would open the site up for all Australians to access enjoy and share the story of their identity and the shaping of the country we now know and love as Australia Now. It would provide an opportunity for understanding the past and providing contemporary meaning.



RESPONSES TO PARRAMATTA NORTH URBAN RENEWAL PLAN

The Parramatta Female Factor Friends acknowledge that the North Parramatta Precinct contains sites of great historical significance and contemporary social value. The recognition of this by the NSW State Government is also acknowledged.

Primary concerns relate directly to:

1. The substantial 6000 multi-story urbanization in the direct vicinity of the precinct
2. Nature of the adaptive reuse
3. Future custodianship not identified
4. Why does the Female Factory site need rezoning
5. Proposed multi story buildings on the female factory footprint
6. Future of historic plantings
7. Use or substantial change to open spaces
8. Lack of recognition of the Parramatta Female Factory Site as a site of conscience
9. Lack of recognition as a potential world heritage site
10. Lack of recognition of the second historic site line
11. Historical material not identified or incorrectly identified
12. Incorrect historical information
13. Archeological work not noted or included in interpretation and would be a necessary part of any developments in Parramatta.

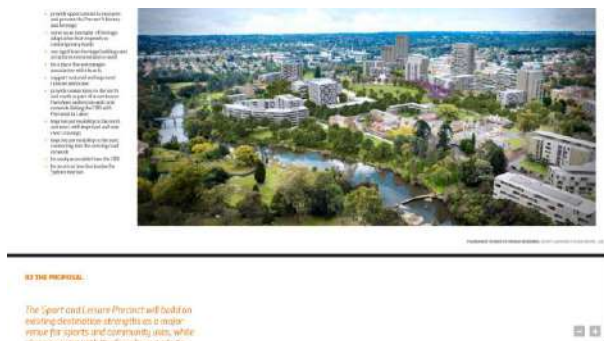
1. THE SUBSTANTIAL 6000 MULTI-STORY URBANIZATION IN THE DIRECT VICINITY OF THE PRECINCT

The social value of the site exceeds economic imperatives that can be met elsewhere. The imposition of high-rise exceeding four stories will impact on visual and historical integrity of the site. There is recognition of the need to increase urbanization in Western Sydney but why specifically here is questionable. Is this accommodation unable to be reallocated in what is currently high rise office space that is under-utilised or in another location? Will it be for high end real estate or will there be affordable housing included. Is this a decision prioritizing economic or social/community good.



2. NATURE OF THE ADAPTIVE REUSE

- The exact nature of the adaptive reuse is unclear. It is noted but not detailed.
- Potential cultural facility for 1818/1825 area indicated in the report. Does this recognize the heritage value - is it interpretation or office hub or another gallery space not acknowledging heritage.
- The enhanced pedestrian access is unclear. It is not depicted as it is, unless there are changes to significant wall area in the 1830s wall or adjacent to it.
- Potential water based activities next to footprint not identified
- Strategy for adaptive reuse not identified
- No interpretive themes or values recognizing the high significance of the site indicated.
- 'A network of restored and reused heritage buildings and landscapes' is noted but without consideration of the integrity of history significance of the Parramatta Female Factory
- Although increasing pedestrian access is desirable, there is no indication of monitoring this important site which already is subject to theft of original material. How will the two new site access points function
- What does mid-high rise mean at oval, how will this impact the Female Factory Footprint
- What precisely does 'Nonresidential - commercial, arts, retail 1818/1825 footprint' mean
- 'activate heritage buildings through new uses and incorporate them into larger development plots' is noted in the report. What does this mean?
- 'Create a zone on the west of the study area that incorporates a majority of the sites heritage buildings and structures' is noted in the report. What kind of zone? Would expect heritage in response to the Female Factory
- Images and maps indicate high-rise building on site. This is inappropriate to the historical integrity of the site and not supported by the Parramatta Female Factory Friends.





The Parramatta Female Factory is a significant historical site in the heart of Parramatta, New South Wales. It was established in 1821 as a place of confinement for women and children of convicts. The site is now a public park and is a major tourist attraction. The site is a significant historical site in the heart of Parramatta, New South Wales. It was established in 1821 as a place of confinement for women and children of convicts. The site is now a public park and is a major tourist attraction.



CONCLUSION
The report has been prepared for the purpose of providing information to the community about the site and its history. It is intended to be a resource for the community and to provide information about the site and its history. It is intended to be a resource for the community and to provide information about the site and its history.



3. FUTURE CUSTODIANSHIP NOT IDENTIFIED

Current ownership and custodianship is Health Administration Corporation. Will this continue or will it be transferred to another state body or will it be sold off to developers or other private organizations. For long term survival and access it is the view of the Parramatta Female Factory Friends that it is state and federal custodianship

4. WHY DID THE FACTORY NEED REZONING

Any rezoning for private commercial or residential use excludes community and other public access (e.g. apartments, shopping centre or hotel). Why did the Parramatta Female Factory and no other historic aspects need rezoning?

5. PROPOSED MULTI STORY BUILDINGS ON THE FEMALE FACTORY FOOTPRINT

Sensitive infill development at the female factory in the Gipps yard with residential with other supporting uses is unacceptable and does not recognize the historical significance of this location. This would be an ideal location for site of conscience, reflection and garden area.



6. FUTURE OF HISTORIC PLANTINGS

Historic plantings as early as the Governor Brisbane period exist on site. Will the historic trees remain? Removal of trees are not identified

7. USE OR SUBSTANTIAL CHANGE TO OPEN SPACES

Only open space specifically indicated is outside the footprint of the Parramatta Female Factory. What is going to happen to the current open spaces that were intrinsic to the history of the Parramatta Female Factory?

8. LACK OF RECOGNITION OF THE PARRAMATTA FEMALE FACTORY SITE AS A SITE OF CONSCIENCE

The Parramatta Female Factory is a Site of Conscience and yet this is not identified

9. LACK OF RECOGNITION AS A POTENTIAL WORLD HERITAGE SITE

Since 2010 the site has been identified by the community as a potential World Heritage Site. Yet this is not indicated, acknowledged or considered.

10. LACK OF RECOGNITION OF THE SECOND HISTORIC SITE LINE

Although the site line to Parramatta Park is acknowledged the one from the gates site to Factory Street is not, even though this is indicted as a second entry point for future plans. High density residential development between fleet and O' Connell are contrary to intention to recognize these site lines. This would impact on building height between Fleet Street and O'Connell Street – not more than 4 stories on Fleet and rising only in relation to historic views.

11. HISTORICAL MATERIAL NOT IDENTIFIED OR INCORRECTLY IDENTIFIED

The following need inclusion as they are either not identified or misrepresented:

- Wall in second class yard erroneously represented on page 16
- Significant building missing page 17 – the dead house
- Unclear if the enhanced pedestrian access in in the 1830s wall or adjacent to it.



- Government Mill Race not identified
- Convict Steps to river access not identified
- Original quarry used for "Factory Stone" not identified

12. INCORRECT HISTORICAL INFORMATION

Although there is a margin of fallibility in historic dates at times due to lack of evidence. It is certain that the Parramatta Female Factory functioned as a factory well past 1840. The last record of female factory inmates was in 1848 at the closure of the factory. It was in this year it became the Parramatta Lunatic Asylum.

13. ARCHEOLOGICAL WORK NOT NOTED OR INCLUDED IN INTERPRETATION AND WOULD BE A NECESSARY PART OF ANY DEVELOPMENTS IN PARRAMATTA

Any development that invades the surface of significant sites needs archaeological assessment as set out by the State Government of NSW. This is not indicated as a necessary activity. As material has been uncovered at the Parramatta Female Factory through archaeology and other invasive events and a ground penetrating radar has been carried out which showed archaeology existing below the surface it is necessary for this to occur on any part of the Female Factory Site from Fleet Street to the river foreshore inclusive.

SUMMARY VIEW

The Parramatta Female Factory Friends consider the current North Parramatta Urban Renewal Plan needs significant revision and greater community consultation to better reflect the history, identity and will of the local community, the people of NSW and the Nation.

The Parramatta Female Factory Friends are ready and willing to advise and participate and support any aspect affecting the heritage and future of the Parramatta Female Factory and other historical sites within the North Parramatta Precinct.

31st July 2015

Mr Rob Stokes
NSW Government - Planning & Environment Dept

Dear Sir

Re: Parramatta North Urban Transformation – Response to Submission Submission

I wish to formally put forward my submission for the Parramatta North Urban Transformation Response to Submissions document. And state that I still oppose the changes made which you expect to be acceptable to residents of this area.

It is very sad to read a document which you have released and promoted to be an improvement on the original proposal. Which clearly is NOT.

‘The cultural landscape heritage assessment of the Study Area prepared by Musecape Pty Ltd (Attachment 8 of the Draft SEPP (PNUR) 2014 Report Framework) confirms the findings of previous studies that the PNUR area’s culture are of Exceptional heritage significance at a State and, potentially, National level, with historical, associational, aesthetic, social, technical/research values. Some components are rare’.

By allowing the high-rise overdevelopment of this area the State and National heritage significance potentially will be ruined for the future. Thus ruining any future potentials.

There are still too many new buildings and their relevant heights being planned for the Cumberland Precinct in and amongst Australia’s colonial buildings. This area as per your own Tanner, Kibble Denton Architects recommendations state that:

“The Female Factory, Parramatta has been nominated for inclusion on the NHL. The study area is immediately adjacent to Old Government House and the Government Domain, which was included on the NHL on 1 August 2007 as part of a group of eight convict-related places across Australia”.

“Any proposals for the study area will need to avoid impacting the National heritage values of Old Government House and the Government Domain. This will include any significant views/vistas to and from Old Government House/Government Domain and the study area”.

This has not been addressed. Nor has the below been addressed.

The Heritage Act 1977 (NSW) aims to conserve the environmental heritage of New South Wales. The Act established the State Heritage Register (SHR) to protect places with particular importance to the people of New South Wales. Most of the Cumberland Precinct and Sports and Lesiure Precinct are included on the SHR under group and individual listings. This is the most important area for all Australians and their cultural heritage you are destroying, this should be a vote for all Australians to be having not just you.

Still no thought has been made to enhance the Precincts heritage values. By turning this Precinct into a tourism generated area, guaranteed to bring the local council and state an income for an indefinate future. Examples of alternatives are simply: Abbotsford Convent, Victoria, Australia; Black Creek Pioneer Village, Canada; Port Arthur, Tasmania; Centennial Park, New York; Callan Park, NSW, Australia.

This proposal with regards to the Cumberland Heritage Precinct really needs to be overhauled – the proposal as it stands is just a prostitution of our own history.

Referring directly about Development lots H1 to H5. To take floors off one building within the heritage precinct to just add them to another is not acceptable. Reducing the whole number of apartments from 4100 to 3900 is an absolute joke.

The current LEP 2011 states that this allotment is zoned R2 – low density residential purely because of its proximity to the Female Factory Precinct and the Conservation Area. Changing it to B4 – mixed use is not an essential requirement. Building an education facility which will be essential for all the new growth in the area is much more acceptable and will provide the long term educational future of children and is definitely required now would be an intelligent move. There is ample parking, off the main street drop-off/pick-up areas, the bus routes on O’Connell St, and the vacant land ready to build on. See more statistical information further down.

The reduction of solar access from 3 hours per day to 2 hours per day is plainly unacceptable. Your shadow diagrams dated June 2004 are incorrect. I know this as I live on O’Connell Street and can see how much sun reaches my home now, on a daily basis throughout winter, let alone when you have high-rise developments built directly across the road. You have not taken into consideration any other buildings and tree shadows in the vicinity, which actually reduces my solar access to less than 2 hours sun per day, which is well below the Australian Benchmark recommended daily solar access acceptance levels of 3 hours per day, this will kill my roses which are over 50 years old, my grass and all of my garden. Let alone the affect that increasing the number of floors and moving building heights around has caused more shadows over the Cumberland Precinct and surrounding cottages. By setting a precedent of 30 storeys this will be the accepted minimum.

Allowing this enormously high over-development in such a sensitive area, can and will ensure the destruction of both the heritage cottages in the Precinct and also in the North Parramatta Conservation Area by means of:

- a) The lack of both morning and/or afternoon sun on these old buildings will increase their vulnerability to having moss, damp and mould problems because for over $\frac{3}{4}$ of the day they will be in shade, which they have never experienced before in their whole lifetimes. This in-turn will increase annual maintenance costs to the local councils/governments as well as to private owners of heritage homes.
- b) The flora which has survived and thrived the past years has done so because of the sun it is receiving now and also because of the pristine surroundings in which they grow in. This will change with high-rise developments being built and with the enormous amount of new residents and their influence to the area day and night.
- c) Biodiversity is critically important for human wellbeing. “It is recognised that biodiversity loss can have significant direct human health impacts if ecosystem services are no longer adequate to meet social needs.” (World Health Organisation 2012). – taken from Parramatta City Councils Life in our City Strategy 2015-2026 plan. This needs to be recognised before it arrives at the Councils door.
- d) Still no infrastructure has been included in your plans. Parramatta Council has now officially announced (at the Council Meeting dated 13/7/15) that the light rail will be built within this

Cumberland Precinct – but it is not shown on your new plans, so where has this been factored in amongst these colonial buildings. Are more of our heritage buildings to be demolished??????

- e) Another 3900 apartments; could be up to and over 9000 people. The traffic congestion is already at a stand-still every morning and afternoon. No widening of roads have been included in your plans, nor off-street parking for new and current workers of our new and expanding city.
- f) There has been no plans included to have new schools to cater for these ever increasing populations in this area alone. Parramatta Council renovating the Old Kings School to accommodate 1000 students is only partially covering the need for the students from the closure of Parramatta Primary School who had over 700 enrollments in 2015 and with the highest catchment growth in NSW at 56.5%, the OKS **WILL NOT** be large enough to educate the new residents in this North Parramatta precinct let alone the rest of the Parramatta CBD in the near future let alone the extended future of this area. Let alone the access and parking problems and OH &S issues having children accessible to the river on site.
- g) I know you think that by passing these responsibilities over to Parramatta Council is relieving you of the responsibility but that is not good enough. YOU, the State Government, have the responsibility to ensure that these basic necessities are provided with any development proposal you try to push onto suburban councils and residents. You are giving developers the go-ahead on this proposal to totally prostitute and demolish this area by featuring high-rise developments instead of a tourism based reserve.
- h) Again there has been no respect, nor concern shown for the history, heritage and residents who live in the Conservation Area which is adjacent to the high-rise development proposed on O'Connell Street. There are a total of 50 buildings individually named in the Local Environmental Plan 2011. 32 of which are State Heritage properties which contribute to the significance of the Parramatta Heritage (and eventually the NSW and Australian) culture and history and the other 18 have been recommended to be kept in their original conditions and no doubt will also become listed in due course. In the 2014 Report Framework document, Table 4 states that only 47 buildings will be retained of the 113 current buildings within the Cumberland Precinct which is less than the Conservation area holds en situ. So a respect of both heritage areas needs to be considered.
- i) Your concept of moving the tallest buildings centrally and lowering the outside units being acceptable is ridiculous. You have misrepresented you own plan, your revised plan clearly shows that the 18 storey has increased to 24 storeys. A new tower block of 18 storeys has appeared where once a 20 storey was. An 8 storey is now a 20 storey as well as numerous other errors. Your submission response does not state that in this form. I suggest a revised realistic plan be submitted to actually show the new proposal. This is still a major OVER-DEVELOPMENT of a highly sensitive area.
- j) This North Parramatta Conservation Area is an area of early government subdivision that retains a considerable number of small dwellings and houses built from 1820 on to the early 20th century. The area contains 46% of the dwellings which existed here in 1895. And as such should be given a basic respect of low rise development around its environment. No where else in NSW is this a fact.
- k) Having high-rise buildings Numbered H1 to H5 directly across the road from the Conservation Area just proves that your consultants do not understand this area, let alone know what is best for

it. By my understanding of the LEP 2011, 5.10 Heritage Conservation, Special Precincts, this proposal will be very detrimental to this area and the heritage of the buildings within it. "Heritage considerations need to be consistent with the character & streetscape of the area, not just within the Cumberland Precinct heritage buildings but also with the heritage buildings set between the Cumberland Precinct and the Conservation area, both need to have new buildings which respect and enhance the era and culture in which the homes were built". High rise buildings of 30, 25 and 20 storeys does not respect any of these conditions. I also understand that Church Street is planning to be developed with a range of high-rise buildings (sourced from the DOPI website, where rezoning has occurred). This will also contribute to putting the North Parramatta Conservation Area into shadows. I believe that the urban planner should not be proposing high-rise buildings between two (2) heritage areas.

- l) The high-rise residential buildings proposed are an **overdevelopment** of the area and they will be out of scale with the surrounding homes. The buildings will be too high and the density of the buildings will not be sympathetic to the integration of the old and new. Nothing that high can ever be sympathetic to the needs of heritage homes.
- m) Building back from the road is not considerate to our needs, expectations and requirements within this proposal when the heights of the buildings are an excessive over-development. In your own Framework report, 4.3 Height of Buildings, you state: "Heritage considerations have fundamentally guided and influenced the ILP, in particular the proposed positioning of taller buildings to minimise their impact on important buildings and views from areas of heritage significance, particularly Old Government House and Domain. This has resulted in graduated height controls. Taller buildings are generally provided to the east side of the Cumberland precinct to avoid conflict with important views and heritage places".
- Well the Conservation Area is in the east side of the Cumberland Precinct and is also a Heritage Place. This is still a total contradiction to what you have planned and the detrimental affect you are going to have to these homes and families within the Conservation Area. Buildings at the heights you have proposed are not a realistic option for this residential heritage area.
- n) Traffic and congestion on O'Connell Street will definitely increase with another 3900 homes (and a further 2000 units proposed at a later time), **Question:** while the space is there and vacant, are you going to widen the O'Connell Street before any new apartment estates are built within this area?? Your own Traffic Impact Assessment states that an additional 280-600 Vehicles per Hour is expected in O'Connell Street alone. But there is no mention of the expansion of this nor other congested roads (ie Church St) in the area, all caused by this proposal. This is something the State needs to acknowledge responsibility for and include in the proposed plans not just pass onto the local City Council.
- o) Impact on the native wildlife in the area, grey-headed & black-headed flying fox (whom are very sensitive to changes) and are both endangered and protected and nest, breed and live in this area. Native birds, kookaburras, lorikeets and recently the return of the powerful owl will all move on because people and concrete have taken over.
- p) The temperature of western Sydney is already higher than the east coast – with so much concrete being built, the temperatures will once again rise.

Whilst I am providing you with my personal information I would like my name and address kept confidential to other stakeholders and bodies who have access to this submission.

Looking forward to your next response which hopefully will be realistic.

c.c. Mark Speakman, Minister Environment & Heritage & Assistant Minister for Planning

Parramatta 2150
17th July 2015.

Re: Parramatta North Urban Transformation Submission

Thank you for the opportunity to make a submission regarding the Parramatta North Urban Transformation proposal.

The Parramatta North Urban Transformation Draft State Environmental Planning Policy (PNUT) 2014 Response to Submissions document was released in June 2015. I have read this document and many of my original concerns remain as follows:

Place of Historical Significance

This site is significant to the Aboriginal people having inhabited the region for 25,000 years or more before European settlement. While little is known of that time, documentation exists regarding the discovery, settlement and early days of living in Parramatta. The site has the potential to provide further archaeological evidence of life in the early colony as evidenced by the current archaeological work with the observatory in Parramatta Park and the finding of the footings of the old bridge found while working on the Lennox Bridge.

The Cumberland Precinct has been connected with institutions for the welfare and care of vulnerable people since the early 1800s. It is a shame that a place built for asylum, may now be sold off to developers, and the people with mental illness may be cared for in multistorey buildings where there is no fresh air or walks in the gardens to assist with their recovery. Some buildings, that are marked for demolition are invaluable to our heritage, being older than many homes in the conservation areas. I would think that the Female Factory and the building that is currently in use as the Institute of Psychiatry (Ward 1), and the Goal are all worthy of heritage listing. The financial cost of maintaining such buildings should be shared between State and Federal Governments. With such collaboration the buildings could be maintained and saved for future generations of all Australians to enjoy. I understand that these buildings will not be

demolished but they will be wasted when viewed in the context of high-rise apartment blocks.

Overdevelopment

In my opinion, the site will be overdeveloped. It seems that every spare piece of land has a building. Some of these buildings are very large and close to heritage buildings as raised in the previous paragraph.

The apartment block on the corner of Albert and O'Connell Streets stands out from every other building in the vicinity due to the proposed size. I live at 1 Harold Street and have a personal interest in the size of this building. A very tall building would deprive me of seeing sunsets through the trees, and have me experiencing shadowing for much of the day especially during winter. The Shadow Diagrams included in the Parramatta North Urban Transformation Draft State Environmental Planning Policy (PNUT) 2014 Response to Submissions document shows that my home will be overshadowed from 3pm in winter. The four storey unit blocks opposite my house in Harold Street already blocks the winter morning sun so I would have approx. 1 hour of sunlight on my home during the winter months. This is not enough to sustain my gardens and lawn, nor dry my clothes on the clothesline. I would also experience loss of privacy due to many windows looking directly over my property. This building (that consumes the entire block between Fennel and Albert Street is directly opposite heritage listed homes on O'Connell Street. I bought into the conservation area a few years back and renovated our 100 + year old home in keeping with the guidelines provided by Parramatta Council for such a home. At the time the Council was very particular about development near heritage items, suggesting that development should minimise any impact on the heritage property in terms of architectural style, scale, setbacks, external materials, finishes and colours. I would implore you to take a similar view with this proposed building that is so big and out of place on the proposed site.

The high density housing also highlights other issues such as current facilities available eg; schools and parking problems. The proposal states that there are to

be 4,100 new homes although the Traffic and Transport Review states that there are to be 5,600 new residential dwellings. Presumably there will be a number of children living in these new dwellings. It is unclear what extra facilities will be required but one would expect extra schools to be a necessity. The North Parramatta Public School already uses demountable buildings so it is puzzling that the proposal is planning to demolish what was a school to build residential towers.

Access to and from the new dwellings will impact on an already chaotic traffic and parking problem in the area. I read with interest the measures suggested in the Traffic and Transport Review to deal with this issue. Along with a couple of 'intersection upgrades' to local streets, it was suggested that 'limited parking ratios, bus improvements, cycle parking and car sharing' would generate significantly less traffic than other residential sites in the vicinity. I have no knowledge of where any of these strategies have worked in the past, nor why anyone would anticipate that they would work in this case. Parking on the local streets in the area is appalling. Since Council removed the parking meters in Harold Street, people park their cars on the street all day, sometimes for weeks at a time. Timed parking is not policed and school collection time sees parents double park, park in no parking areas in a very dangerous manner every day. The increase in the number of apartments locally is commensurate with the number of cars parked on the streets.

Parramatta is not just another City

The State Government and Parramatta Council have the opportunity to make a real difference for the current and future residents of Parramatta. Residents are advised in a variety of sources that Parramatta's population is set to boom with several residential apartment towers currently under construction and plans for a new high rise University of Western Sydney Campus including a further 10,000 residential students.

The Parramatta City Council's Community Newsletter, Parramatta Pulse (April-June 2015) reported the Council's vision to make Parramatta, Australia's next

great city, but Parramatta can do better than that. Why would Parramatta settle for being just another city in Sydney full of residential towers when we have so many assets that the others do not?

Parramatta has open parkland that is home to some of the oldest buildings in Australia, some with heritage listing. If this public land is sold, then the heritage listing will be threatened and the land lost to the public forever. While the sale of this valuable land will help the Government to balance its books (once), it is shortsighted at best. With sensitive and thoughtful planning this area could operate as a viable tourist destination for all Australians and overseas visitors to understand part of our heritage and early colonial days.

The NSW State Government and Parramatta Council has the opportunity to keep Parramatta unique by saving the North Parramatta precinct as a historical destination to be enjoyed by generations to come.

Regards,

Additional submission in response to the 'Response to Submissions, SJB Planning, 9 June 2015' document. Initial submissions were made in response to the Parramatta North Potential State Significant Site Exhibition, Department of Planning & Infrastructure – Exhibition commences 19/11/2014 and closes 19/12/2014 – Parramatta North Urban Transformation, Urban Growth NSW

I have read the document titled 'Parramatta North Urban Transformation Draft State Environmental Planning Policy (PNUT) 2014 Response to Submissions, SJB Planning, 9 June 2015' that was open to public viewing via [http://www.planning.nsw.gov.au/parranorth in June 2015](http://www.planning.nsw.gov.au/parranorth_in_June_2015).

I am sending this document to the NSW Department of Planning and Environment and Parramatta City Council so both parties can respond to my concerns. I hope that this document is also forwarded to the Hon. Rob Stokes, Minister of Planning for further consideration.

There are two main responses I have to the document mentioned above:

1. Firstly, I will restate the comments from my original submission that I believe have not been sufficiently responded to and
2. Secondly, I would like to state additional concerns that the Response to Submissions has raised.

The below points in blue text are from my original submission in response to the PNUR proposal that I believe have not been reasonably addressed in the response to submissions. I have also added further comments in black text as a result to the response to submissions.

Parramatta Pool

1. [If the current proposal is approved would there be a new public pool open for business prior to closure of the existing pool? Would this pool be within the postcode of 2150 Parramatta or 2151 North Parramatta? With the influx of residents in the area \(refer to the current residential developments in Parramatta eg Aspire, Meriton and V by Crown\) where would the residents go for swimming lessons, sporting triathlons, training sessions, water polo matches and general public pool use?](#)
2. [The government promotes that we are now living longer so a healthy lifestyle is essential, How would the removal of a sporting venue assist in this objective?](#)

Additional submission in response to the 'Response to Submissions, SJB Planning, 9 June 2015' document. Initial submissions were made in response to the Parramatta North Potential State Significant Site Exhibition, Department of Planning & Infrastructure – Exhibition commences 19/11/2014 and closes 19/12/2014 – Parramatta North Urban Transformation, Urban Growth NSW

3. The Response to Submissions indicates that it will be Parramatta City Council and Parramatta Park Trust's decision regarding the location/ relocation of the existing pool. There has yet to be one definite answer provided by Urban Growth, Parramatta City Council or the Parramatta Park Trust regarding why the Urban Growth rezoning submission has included mixed use developments of 4 – 8 storeys if the pool is not being considered for closure.

There is no transparency in this matter. The community is being redirected to different stakeholders with no answers to our questions on the subject.

With respect for the community I would appreciate if we could receive a clear answer from the deciding bodies.



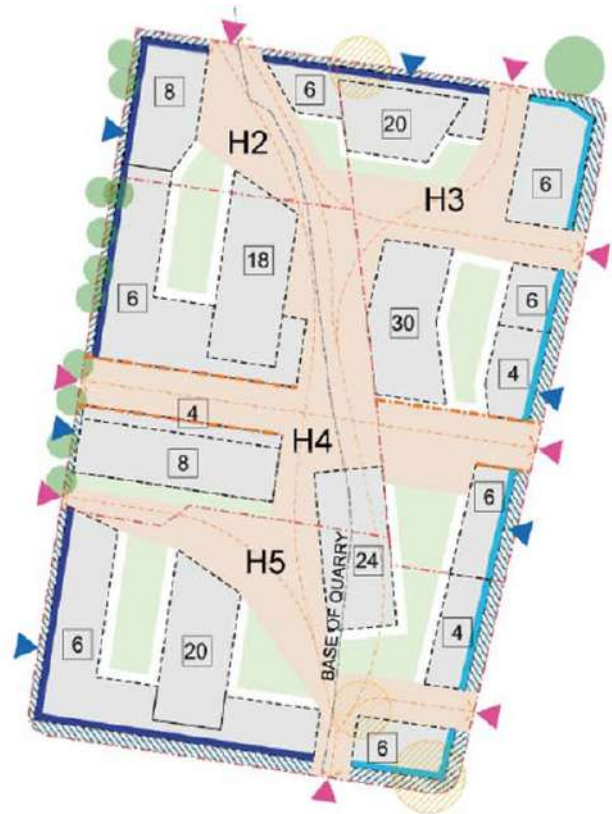
Image from 'Response to submissions, SJB Planning, 9 June 2015'. The image clearly indicates the proposal of buildings on the top of the existing Parramatta Pool.

The development of high density (proposal suggestion of up to 30 storeys) apartments on O'Connell Street (between Fennell and Albert Streets)

1. Will the existing nursing homes and House of Hope be relocated within the North Parramatta area? One of the reasons I moved to this location was the close proximity to the nursing homes so I can be close by when my parents need palliative care. I would like to know if you have visited the nursing homes and House of Hope on the proposed development site to address this with the residences and employees. As you would be aware it would be virtually impossible for the occupants to visit the drop in sessions arranged by the Department of Planning & website information.
2. Will each apartment in the proposed building have a designated car space on the building site? Will visitor parking be onsite? Albert Street is currently at full capacity with visitor and resident parking. O'Connell Street does not currently have space for off street parking and Fennell Street is always busy with visitors and residents too. I have read the PNUR Traffic and Transport review which mentions an expected 9,000 (approximately) new vehicles in the area once all apartments in the Urban Growth NSW Parramatta North Urban Renewal proposal are complete. It is unrealistic to think that this amount of new vehicles will be offset by cycle ways and public buses as the report suggests.
3. Would Albert Street's cul-de-sac be converted into a street which runs from Albert Street into the Cumberland Precinct? If yes, this would have a dramatic impact on the quiet and leafy existing cul-de-sac.
4. Although the planning proposal indicates a mixed level residential development on the mentioned blocks from 6 to 30 storeys would there be any limitations set in place if the rezoning is approved? If rezoning is approved, what would stop a developer from changing the current proposal of mixed level apartments to high density 30 storey buildings covering the two blocks?

I can only find reference in the response to submissions that if there were changes to the existing proposal it would need to be presented to council for DEAP consideration. What would prevent a future developer who is allocated a lot on the proposed sight to change the currently proposed heights of the buildings if the rezoning is approved to 30 storeys eg the existing plans propose a diverse range of buildings so what would prevent a developer and the DEAP from changing the existing proposal to even more 30 storey towers?

5. With reference to Lots H2 – H5 how can the response to submissions state 'The increase in shadow casts to surrounding properties is considered to be minor'(pg. 22/35 Response to Submissions Report]? Clearly by constructing multiple 18, 20, 24, and 30 storey towers it is going to obstruct the existing residence's access to sunlight. The sunlight which is currently used to grow organic vegetables, dry clothes and naturally enjoy vitamin D instead of buying it at a chemist.



6. There are also privacy issues with these towers being constructed across the road from the existing one to three storey dwellings. The response to submissions states that a space of 22 metres between the development and the existing residences is sufficient – perhaps it's seen as sufficient by the people who developed the regulations but not by the people who will be living in the area. Also, I cannot see a gap of 22 metres on Albert and Fleet Street between the development and the existing residences.
7. It seems a six storey wall will be erected on some external parts of H2 – H5 which will be a massive opportunity for local graffiti artists to express themselves. Six storeys is double the height of most of the surrounding buildings. It will create the feeling of us vs them and a penitentiary environment.

8. This is a photo I recently took at from the entry to Goold Street, Chippendale, NSW, 200 which clearly shows the overshadowing and privacy issues for the existing terrace residents after the Central Park towers were built next door. It's too late for these residences but let us learn from experience and not let this happen in the PNUT.



9. The cost of new apartments is not intended for the median income earner since currently costs of new developments in Parramatta are at least 700,000 for a 2 bedroom unit. Put council rates and strata onto these weekly costs and it's clear that the developments are not for the median Australian income earner. These developments are adding to the great divide of the 20% of Australians with wealth to afford these developments and the rest of Australians who cannot. Altitude by Meriton is currently \$849,000 for a 2 bedroom unit while V by Crown will be \$1,055,000 for a panoramic 2 bedroom unit. A loan amount of \$840,000 would see the borrower making repayments of \$1,112 weekly (that's with the current low interest rates). A recent report mentioned repayments should not be more than 30% of your income so it's clear that many Australians cannot purchase these properties which results in offshore buyers who do not have an interest in the area or the building. This is a massive issue in Australia as a result of the current development booms which needs to be addressed. Where is the affordable housing?? The response mentions only 3% may be affordable housing which is really not realistic in comparison to the needs of Australians.

Infrastructure & amenities

1. How would the roads in North Parramatta be amended to deal with an approximate increase of around 9,000 cars after the development is complete? Currently O'Connell Street heading south and Church Street heading north east is grid locked in peak hour traffic. If the traffic is currently not being managed how would such a huge increase in residents be accommodated on the roads? (Please do not refer me to public transport and cycleway options as it is evident that these are unrealistic and would not balance the congestion issues.)
2. Where would visitors find parking post development? Currently the parking opportunities are very limited in North Parramatta. How would an increase of visitor parking be accommodated in the construction of the residential developments? If I have interstate guests and family who require parking for more than one or two hours during their long stays what would be their options?
3. How would construction noise and debris be managed during the development stage of this project? Since this is a 15 – 20 year project I believe the existing residents of the area will not only experience emotional effects but physical effects such as the noise and debris side of construction. How will this be minimised during the 20 year timeline?
4. How would post development noise be managed due to the increase in cars, people, waste etc? Currently the area is a quiet leafy village style suburb which would be seriously altered for the worse with the increase in 4,100 dwellings.

On page 20/35 of the Response to Submissions it mentions 'the desire to encourage public transport options over private vehicle use'. This is unreasonable since currently there is not enough street parking for the existing residents and their guests so how would public transport become the main option once you add 3,900 new dwellings with approximately 9,000 new vehicles in the area? With the developments currently approved in the City of Parramatta the need for rezoning in North Parramatta appears ridiculous since the current infrastructure cannot cope with the existing residences.

5. This is a photo I recently took at Parramatta Train Station at 8am. You can clearly see that the existing train system is under pressure with the number of commuters. Every train from 7.30am – 9am arrives at Parramatta Station with this amount of commuters waiting to board. Rarely would anyone get a seat on the train with the majority of people boarding at Parramatta standing to Central and beyond (25 -30 minute ride) that we pay at least 4.30 for each way!



I'd also like to know who is on the Parramatta Council's Design Excellence Advisory Panel (DEAP). I would appreciate their contact details so I can forward a copy of this document to them directly.

In summary, the PNUT proposal (formerly PNUR) and the response to submissions document does not take into consideration the serious concerns of the community. The proposed area for development is not for a secluded space of untouched remote land in NSW. The proposal is for land that is already being used and is surrounded by an active community. The community should be a driving force in the concepts for this project. The proposal requires further consultation with ALL stakeholders especially the community before any further decisions are made. Hopefully by this stage the Department of Planning & Environment and the Minister can see the deficiencies in the PNUT development proposal and will NOT REZONE THE AREA.

PARRAMATTA NORTH

POTENTIAL STATE SIGNIFICANT SITE

Submission prepared by

St George Community Housing Limited

December 2014

St George Community Housing (SGCH) has examined the publicly exhibited amendments to Parramatta Local Environmental Plan 2011 and Parramatta City Centre Local Environmental Plan 2007 which will establish new land use and development controls for 32 hectares of land within the 'Cumberland' and 'Sports and Leisure' sub-precincts of the Parramatta North Urban Renewal (PNUR) site. We welcome the opportunity to provide a submission in support of the changes

SGCH is one of Australia's leading not for profit Community Housing Providers (CHP) with over 8,500 Australians living in over 4,200 homes we manage or own. The last few years have been a period of strong growth for SGCH and next year we celebrate 30 years of operations and we have begun developing and constructing our own affordable housing projects.

SGCH is now one of the largest non-government providers of affordable and social housing in Australia and is leveraging off the value of it's assets to house more Australians including those who are homeless, elderly or most vulnerable; those who are in housing stress in the private rental market or in need of affordable housing that is close to work or study.





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www.sgch.com.au

About St George Community Housing

In considering this submission the following points about SGCH are particularly relevant and distinguish us from Government, other developers and private property owners:

- SGCH is not part of any State or Federal Government department and is owned by its members who are drawn from its tenants and employees.
- It is a not-for-profit charitable organisation with a volunteer Board of Directors and is categorised as a Public Benevolent Institute (PBI) by the Australian Tax Office (ATO).
- SGCH is also a Registered Class 1 Community Housing Provider (CHP) and is subject to the NSW Housing Act 2001 (the Housing Act) and regulations. Our Class 1 status means that SGCH has a legally binding obligation to NSW State Government to play a role in expanding the supply of affordable rental housing in NSW.
- Our role is commensurate with the provisions of the Environmental Planning and Assessment Act 1979 an object of which is *'the provision and maintenance of affordable housing'*.
- SGCH is not like private developers who develop affordable rental housing on a temporary basis. Affordable housing developed by SGCH is part of a long-term permanent portfolio of affordable housing dwellings in which the State Government retains an interest via a covenant on title through the provisions of the NSW Housing Act.
- SGCH may undertake strategic sales of social and affordable housing dwellings however this will never result in any net loss of dwellings and would only be actioned if it resulted in a net increase in the supply of social and/ or affordable housing.
- SGCH has commitments to the State Government to leverage funding off the value of its social and affordable property portfolio (and the associated rental income stream) to develop new affordable housing. As such we have obligations to private lending institutions and their requirement to only undertake residential developments which would be profitable as if undertaken by the private sector. We have taken on this role to free the State Government from committing to debt obligations and this is one of the main reasons we are rapidly expanding.
- SGCH's work is concentrated at the interface of the private and public sectors where decision-making must often resolve the diverse interests of tenant requirements, statutory controls, market constraints and public opinion. We cannot do this on our own and we need a realistic commitment from all levels of Government to tackle the housing affordability crisis.

Affordable Rental Housing Demand in the City of Parramatta

SGCH would like to highlight the serious issue of housing affordability in the City of Parramatta and consequent implications for the local economy, environment and society. The lack of housing affordability in Parramatta affects people on low and moderate incomes and our own research indicates that the LGA has some of the largest numbers of low and moderate-income earners in rental stress.

Average weekly earnings in Parramatta have not kept pace with the cost of rental accommodation. NSW Centre for Affordable Housing data indicates that the percentage of rental stock in Parramatta LGA that is affordable for moderate, low and very low income households has consistently been at record low levels since 2009.

Table 1 Decreasing availability of affordable housing in Parramatta LGA

Percentage of Parramatta LGA rental stock that is affordable for households with:

	Very Low Incomes¹	Low Incomes²	Moderate Incomes³
June 2006	15.2%	56.4%	89.8%
December 2009	3.7%	20.3%	81.6%
June 2014	1.8%	10.1%	74.9%

In June 2014 the percentage of advertised rentals that were affordable for moderate income households was 74.9%, for low income households 10.1% and 1.8% for very low income households. A moderate household income is defined as being up to 120% of the median income for Sydney. Most households entering the Parramatta rental market are therefore considered to be in rental stress; defined as being households incurring housing costs above 30% of their household income. This compounds the deleterious effects of unaffordable home purchase prices, as these households are unable to save for a home loan deposit.

At currently levels of affordability, SGCH considers the local private rental market is not capable of providing affordable housing which is appropriate to the needs of families with a single income earner, people on minimum wage, in casual/ part time employment and who are not eligible for social housing programs.

Considering the future key role of Parramatta LGA as Sydney's second CBD and the position it will play in the Sydney economy this has severe implications for the provision of key services, labour supply, social equality and transport.

¹ Very Low Incomes is below 50% of the Census Median Equivalised Income

² Low Incomes is 50% - 80% of the Census Median Equivalised Income

³ Moderate Incomes is 80% - 120% of the Census Median Equivalised Income



Our feedback into the project

Support for rezoning of the Parramatta North Urban Renewal Site

SGCH strongly supports development of the PNUR site and increased density taking advantage of existing underutilised infrastructure. SGCH also supports efforts to retain preserve and interpret items of heritage significance.

However, we submit that the exclusion of affordable rental housing is out step and inappropriate for a precinct which to quote the PNUR Social Significance report⁴:

'has, since 1818, been associated with institutions committed to the welfare of disadvantaged and vulnerable people'.

This is for reasons explained in the exhibited PNUR planning report⁵:

The site is subject to heritage constraints that will require significant capital expenditure. Preserving heritage assets as an integral outcome of the renewal process is considered an appropriate compromise; adding affordable housing is an additional financial burden that the project cannot support.

SGCH submits that the heritage of the PNUR precinct should not be considered a constraint, but rather welcomed as an opportunity. Because items of State heritage significance occupy the subject site, it is appropriate for funds to be obtained from the State budget to fund the retention, conservation and re-use of heritage buildings, structures and their landscape settings. Furthermore, heritage should not be used as an excuse to exclude affordable housing.

Many of our tenants have told stories of how SGCH changed their lives for the better, offering them health and wellness they could never have achieved without housing support. Housing stability offers tenants powerful life-changing benefits, such as a chance to:

- Save and work towards independence
- Stabilise and/or recover from mental illness
- Stabilise and/or recover from physical illness
- Concentrate on building a stable family life
- Access community activities and facilities
- Concentrate on life's small joys and find happiness
- Finding support when support seems impossible
- Make friends and get involved in the community

⁴ *Parramatta North Urban Renewal and Rezoning. Baseline assessment of social significance of Cumberland East precinct and Sports and Leisure precinct and Interpretive Framework.* 21 October 2014

⁵ *Parramatta North Urban Renewal Draft State Environmental Planning Policy (PNUR) 2014 Planning Report.* 12 November 2014

The irony of excluding affordable housing from a precinct long associated with the welfare of some of society's most disadvantaged people is not lost on a CHP sector currently struggling to provide safe, secure and stable housing for some of the most vulnerable households in Sydney. Access to housing is a human right that is not at present sufficiently provided by the private market.

Affordable housing is a critical determinant not only of social cohesion and household well-being but also of labour market efficiency. A healthy small business community is highly dependent on the availability of housing for low income earners who are not subjected to high rents, long commuting journeys and can work flexible hours. Workers employed as service providers are an essential workforce within our community. These workers keep our offices clean, our restaurants running and are the backbone of a well-run service industry – something many communities depend on. In Sydney, childcare workers, teacher's aides, food service providers, cleaners and housekeepers have incomes well below average.

Affordable housing target

SGCH would recommend a minimum 15% affordable housing target for the PNUR site however makes the point that developer contributions should be set at a realistic level. That is, a level that does not jeopardise development viability and the right type of proposals but is sufficiently high enough to reflect the significant windfall that accrues to property owners as a result of land rezoning and increases in development potential.

Appropriate contributions and incentives must be determined through careful analysis of local property market conditions. A comparison with other affordable housing schemes might be useful, but will not necessarily bear a resemblance to local conditions.

Affordable housing contribution method of calculation

In terms of how the affordable housing percentage target is calculated, SGCH strongly recommends that the contribution be levied as a percentage of the total gross floor area (GFA) proposed in the precinct. A levy that is based on such a precise measurable quantity is less open to dispute or evasion.

Other methods of calculation such as targets based on the total number of dwellings incentivise private developers to propose dedicating smaller dwellings with lower quality finishes (while retaining larger ones for sale) resulting in the need for rules and negotiation. Alternatively, a target based on the market value of a development, developer profit or even total development costs would for obvious reasons be difficult to enforce or police. Measuring against the total quantum of GFA approved under a development application would avoid these administration difficulties.

The downside of levying contributions which use a flat square metre contribution rate is that it may be more onerous for developments which have a lower square metre value and may push developers to concentrate on producing dwelling stock at the higher value end of the market. However, given the scheme is being applied to a relatively compact area (32

hectares) the large differences which occur across the city are unlikely to occur and a flat rate levy is appropriate.

Affordable housing contribution form

SGCH acknowledges that there are numerous pathways to successful affordable housing provision. However, in the case of the Parramatta North Urban Renewal an excellent opportunity is presented for inclusionary zoning, that is, to provide affordable housing on site and integrated with the rest of the community. For this and other reasons SGCH strongly recommends that the affordable housing contribution be in the form of both:

- a contribution of land within the residential precinct, and
- a monetary component to fund construction.

A contribution of land within the precinct is preferred because access to local land markets is not guaranteed and can result in significant delays in housing provision as well as costs above and beyond that envisaged. The land contribution should be:

- identified and valued up-front and as early as possible
- capable of accommodating development in stages and if required, by multiple CHPs
- separately subdivided and under multiple developable Torrens title lots
- sufficiently large enough to yield the affordable housing target
- be appropriately serviced and zoned (appropriate height and density controls)

In the experience of SGCH, affordable rental housing is best provided in the form of discrete residential flat buildings, 100% of which are managed and operated by the CHP which develops them. This is because scattering affordable rental dwellings in numerous strata schemes tends to increase administration costs through CHP involvement in multiple body corporates. It may also result in excessive strata fees needed to cover facilities CHPs would prefer not to provide such as communal gyms, pools and extensive common areas or gardens. Strata fees in some Sydney apartment schemes can be in excess of the rental income produced by an affordable housing unit.

In terms of a built format it would be helpful if the affordable housing land contribution was in the form of a number of parcels permitting residential flat buildings of 40-60 dwellings. At this size, the affordable housing development is not too large, and not too small for CHPs to develop and construct as well as manage and operate. At this scale construction management risks to the CHP can be more easily accommodated. This is critical given capacity and capability of the CHP sector in NSW.

Tenancy side management risks can also be mitigated more effectively as large developments in a single location can result in vacancies despite very high demand for affordable rental housing. This is a risk in the affordable housing asset class created by

(amongst other things) government imposed income eligibility requirements which target key worker households and the need for financial sustainability of the development.

SGCH notes that construction cost savings can also be made if the development is accommodated in buildings of less than 25 metres effective height (defined by the BCA as the height measured to the floor of the topmost storey i.e. buildings 9 storeys and less). At heights above this more stringent fire control measures need to be employed and this can add to significant construction costs.

Monetary contribution

Because the best affordable housing contribution form is land provided within the precinct which a CHP can develop according to its operating requirements and the needs of its tenants, the associated monetary contribution should be sufficient to cover the total cost of development of the affordable rental housing target and apportioned to each new square metre of floor space developed for privately owned dwellings. This should be subject to a rigorous assessment to ensure effective delivery of the target.

A target of 15% of 410,000 m² GFA of residential development accommodated on site yielded 61,500 m² GFA of affordable rental housing the total cost of provision would therefore need to be shared amongst the remaining 348,500 m² of GFA. It may also be applied to the non-residential floor space component of the precinct.

The levy should be subject to a rigorous method of calculation which takes into account administration costs and the real costs associated with developing new affordable dwelling stock including compensating property owners within the UAP who contribute land.

The likely yield within the planned 61,500 m² of GFA would be 615 dwellings and it would be logical if the land component were delivered in 10-12 tranches yielding 40-60 dwellings each. Given the increasing sophistication of CHPs in NSW and links to private lending institutions, the delivery of affordable housing on site could be brought forward if land was delivered before the cost of construction was covered by the levy.

A fixed flat rate levy charged on a per square metre basis is preferable as it is:

- **Mandatory** - allowing decision makers to achieve set targets,
- **Transparent** - allows developers to factor it into their project feasibility, and
- **Orderly** - development is not encouraged to exceed limits set by planning instruments.

Indexing of monetary contribution rates

Monetary contributions need to reflect changes in land prices and construction costs.

Councils currently index their fees and levies against various ABS indexes accounting for prices changes over time. SGCH recommends that the best indexing method would be the ABS House Price Index i.e. once an appropriate levy rate was set.

Other matters

Developer contributions

SGCH strongly supports the principle of automatically excluding affordable housing developments undertaken by CHPs registered under the NSW Housing Act from developer contributions. Such an exemption significantly increases the financial feasibility of affordable housing developments and greatly increases the likelihood SGCH (and other CHPs) would develop affordable rental housing in the local area over and above the stated target by leveraging funds off the value of the assets from private lending institutions.

SGCH is a Registered Class 1 Community Housing Provider and has the capacity to develop and construct as well as manage affordable & social housing. SGCH is actively looking to gain a significant presence in the local affordable housing market.

This submission was prepared by:

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Your Reference: Parramatta North
Our Reference: F2014/00735
Contact: Jennifer Concato
Telephone: 9806 5767

Mr Michael File
Director Urban Renewal
Department of Planning & Environment
GPO Box 39
SYDNEY NSW 2001

9 January 2015

Dear Mr File

Public Exhibition of UrbanGrowth NSW proposal for the Parramatta North Urban Renewal precinct – Submission

I refer to your letter dated 19 November 2014 advising of the public exhibition of the UrbanGrowth NSW proposal for the Parramatta North Urban Renewal precinct.

Council considered a report on the proposal at its meeting of 15 December 2014, where it resolved to make a submission on the proposal. Accordingly, please find attached a copy of Council's detailed submission on the proposal for your consideration.

Council is keen to work cooperatively with representatives from UrbanGrowth NSW and the Department of Planning and Environment to resolve the matters identified in our submission and work towards the goal of achieving a high quality, connected, vibrant and activated precinct.

If you have any questions in response to Council's submission, please contact Jennifer Concato, Manager City Strategy on 9806 5767.

Yours sincerely

A handwritten signature in purple ink, appearing to read 'Greg Dyer', written over a horizontal line.

Greg Dyer
Chief Executive Officer



Parramatta North Urban Renewal Precinct



Submission

Parramatta City Council

December 2014

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Part 4 – Concluding Comments

Part 1 – The Proposal

1.1 Introduction

The 'Parramatta North Urban Renewal' precinct consists of 146 ha of NSW Government owned land and includes four distinct precincts: Parramatta Park Precinct, the Cumberland Precinct (Cumberland Hospital (East) campus), the Old Kings School Precinct and the Sport and Leisure Precinct (including Parramatta Stadium), as illustrated in the Precinct Map below. The NSW Government, through UrbanGrowth NSW, is proposing a new planning framework for portions of the Cumberland Precinct and the Sport and Leisure Precinct.

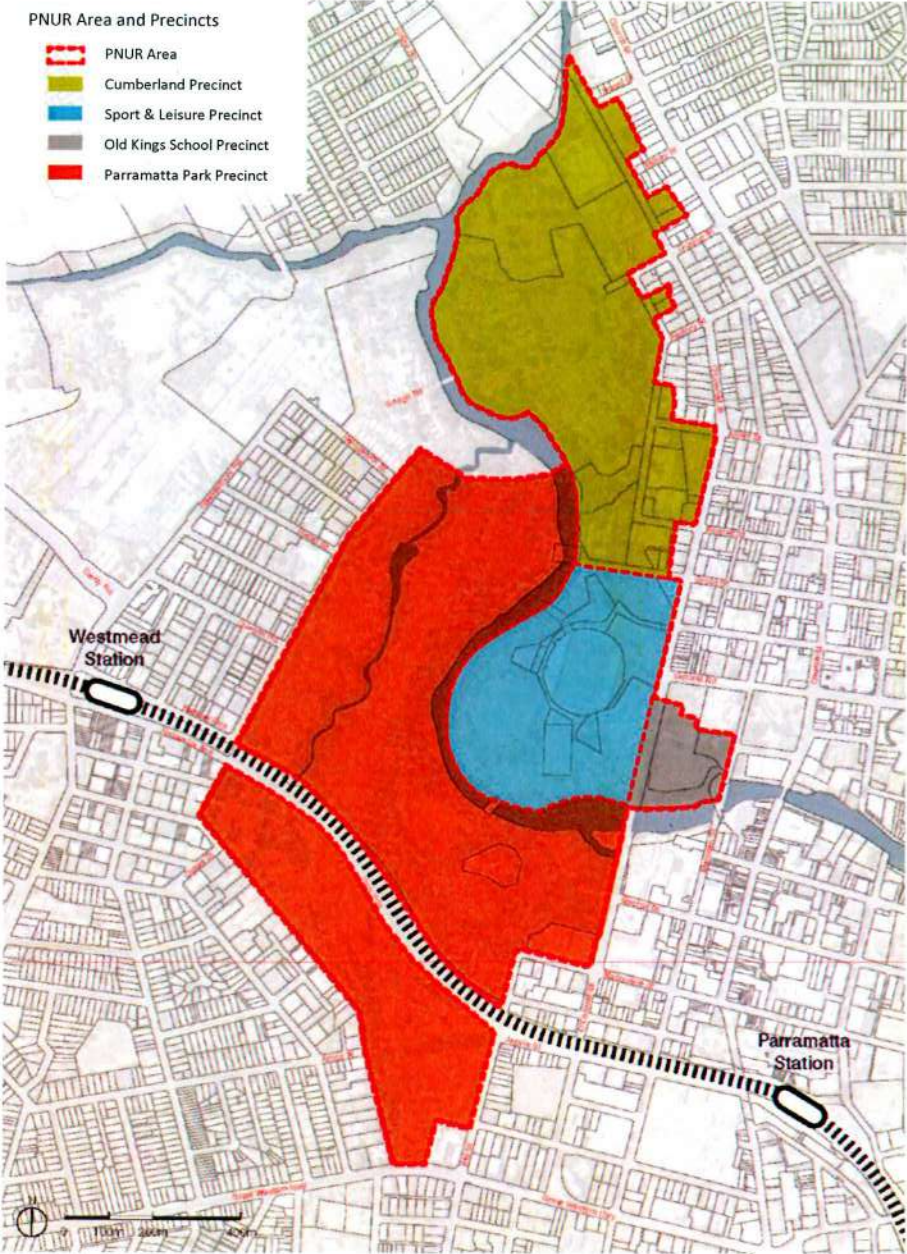


Figure 1 – Parramatta North Urban Renewal Precinct Map

The intent of the proposed new planning framework is to facilitate significant urban renewal in the Cumberland and the Sport and Leisure Precincts. The project aims to create a vibrant heritage mixed-use precinct, largely focussed on housing opportunities. Further, the project aims to honour the rich history of the area, whilst at the same time as planning for the needs of future generations.

The NSW Department of Planning and Environment (who is the relevant planning authority for this proposal) exhibited the proposal by UrbanGrowth NSW for the Parramatta North Urban Renewal precinct from **19 November 2014 until 19 December 2014**. The Department invited submissions from the community and other stakeholders, including Parramatta City Council.

This document is Parramatta City Council's detailed submission in response to the proposal.

1.2 Proposal by UrbanGrowth NSW

It is acknowledged that UrbanGrowth NSW has regularly engaged with Council Staff and Councillors, however this has been the first opportunity to review the proposal in detail.

The UrbanGrowth NSW proposal presents a new planning framework to support rezoning of over 50 hectares of NSW Government owned land within parts of the overall Parramatta North precinct. Rezoning is proposed for portions of the Cumberland Precinct and the Sport and Leisure Precinct. This land has been identified as under-utilised and suitable for comprehensive urban renewal that can both provide for new uses and support established uses on these sites.

The following is a high-level summary of the key features of the proposed new planning framework:

a. Cumberland Precinct:

- i. Retention of existing B4 Mixed Use zone, with rezoning of some additional land to the north from B6 Enterprise Corridor/SP2 Infrastructure (Classified Road) to B4 Mixed Use.
- ii. Rezoning of the central open space area to RE2 Private Recreation.
- iii. Removal of the FSR control and introduction of a GFA control by development lot.
- iv. Approximately 4,100 dwellings.
- v. Heights up to 30 storeys.
- vi. Approximately 28,000 sqm GFA of adaptive reuse of retained heritage buildings.
- vii. Up to 4,000 sqm GFA of retail space (new village centre).

b. Sport and Leisure Precinct:

- i. Rezoning a portion of land surrounding the stadium (to the east and north) from RE1 Public Recreation and RE2 Private Recreation to B4 Mixed Use.
- ii. Introduction of a height control and GFA control by development lot (for the land being rezoned).
- iii. Approximately 34,000 sqm GFA of mixed use (likely to be predominantly commercial).
- iv. Heights ranging from 4 to 8 storeys.

The key features of the proposal are identified in the Indicative Layout Plan, a copy of which is provided below.



Figure 2 – Indicative Layout Plan

The exhibited proposal consists of a Summary Report, Planning Report, Draft SEPP (to amend the LEP), proposed amendment to the *Parramatta Development Control Plan 2011* and a number of technical studies. The Summary Report outlines the proposed new planning controls and key findings of the technical studies that relate to urban design, heritage, traffic, and biodiversity. The Planning Report and technical studies have more detailed information.



Figure 3 - Artist's Impression: Cumberland Precinct, view across Parramatta River (looking north)

Part 2 – Strategic Assessment

2.1 Guiding Principles

At its meeting of 8 September 2014, Council adopted the following set of guiding principles, which were used in consulting with UrbanGrowth NSW in the development of draft planning controls for the precinct:

- a. Restore and renew heritage buildings within the precinct.
- b. Create a vibrant mixed use precinct, with high quality built form that integrates well with existing heritage and achieves design excellence.
- c. Provide a high quality and connected public domain, which provides public access through the precinct and also to the river foreshore.
- d. Ensure that planning for the precinct adequately considers the recreational, educational, cultural and social needs of the new community, including any impact on the provision of supporting infrastructure and public facilities.
- e. No exemption from Section 94A contributions payable, so as to ensure funds can be provided towards new infrastructure and public facilities.
- f. The provision of Light Rail through the precinct, to connect with Westmead, the Stadium Precinct and the Parramatta CBD.
- g. Create a vibrant, world class sports and entertainment precinct, incorporating Parramatta Stadium and surrounding recreational features.
- h. Ensure that the Parramatta Sports Precinct is highly visible and prominent from O’Connell Street and is surrounded by compatible and complementary uses.
- i. The inclusion of proper infrastructure to support the proposal including schools and public education facilities.

The following table presents a high level strategic assessment against each of Council’s guiding principles for the precinct.

Council Guiding Principle	‘High-Level’ Strategic Assessment Comment
Restore and renew heritage buildings within the precinct.	All 25 buildings identified as having Exceptional significance and all 22 buildings of High significance are to be retained. Buildings to be demolished comprise 15 of Moderate significance and 32 of Little significance. The remaining 8 buildings to be demolished have no rating of heritage significance. It is not clear however how buildings to be retained will be restored as part of the overall redevelopment, including staging.
Create a vibrant mixed use precinct, with high quality built form that integrates well with existing heritage and achieves design excellence.	The proposal will allow for the creation of a vibrant mixed use precinct, including a new village centre. Taller building forms are generally located away from significant heritage buildings

	and view corridors. A key design principle is to allow for a built form distribution that balances the need to activate existing heritage whilst also providing appropriate landscape curtilage. Bonuses for height or GFA are not proposed for design excellence, instead design excellence will be expected for all development.
Provide a high quality and connected public domain, which provides public access through the precinct and also to the river foreshore.	The proposal does allow for a connected public domain, which will provide public access through the precinct and also to the river foreshore. It is unclear however how this will be delivered, including staging. Some concern is raised about the proposed RE2 Private Recreation zoning of the central open space area (O/S 3), as this would appear to conflict with the intent to make this a public park (see detailed assessment in Part 3 of this submission).
Ensure that planning for the precinct adequately considers the recreational, educational, cultural and social needs of the new community, including any impact on the provision of supporting infrastructure and public facilities.	A Community Needs and Impact Assessment (Social Impact Assessment) has not been prepared. The Baseline Assessment of Social Significance prepared relates to heritage values, rather than the recreational, educational, cultural and social needs of the new community. The proposal does allow for a number of infrastructure upgrades, including open space embellishment, a foreshore pedestrian trail and a shared cycle path. However, the proposal does not include built facilities for broader community use, though opportunities may arise through the detailed development phases, particularly relating to options for adaptive reuse of heritage buildings.
No exemption from Section 94A contributions payable, so as to ensure funds can be provided towards new infrastructure and public facilities.	No exemption from Section 94A contributions has been sought by UrbanGrowth NSW. Payment of Section 94A contributions through the development life of the project will fund new infrastructure and public facilities.
The provision of Light Rail through the precinct, to connect with Westmead, the Stadium Precinct and the Parramatta CBD.	The precinct should be supported by Light Rail given the introduction of 4,100 dwellings and the new village centre. This has not been included in this proposal, which is of significant concern.
Create a vibrant, world class sports and entertainment precinct, incorporating Parramatta Stadium and surrounding	The proposal provides for a mixed use zone in close proximity to Parramatta Stadium. It is unclear how this area will redevelop and

recreational features.	whether this will help to fund new sport and community facilities.
Ensure that the Parramatta Sports Precinct is highly visible and prominent from O'Connell Street and is surrounded by compatible and complementary uses.	Greater certainty should be provided to ensure compatible and complementary uses are located within the sports precinct as well as to safeguard visual prominence of the sports precinct from O'Connell Street. Concern is raised that the proposed B4 Mixed Use zone along O'Connell Street will set an expectation for residential development, which is considered to be an inappropriate and incompatible land use in close proximity to the stadium.
The inclusion of proper infrastructure to support the proposal including schools and public education facilities.	No schools or public education facilities are proposed within the precinct, despite the introduction of 4,100 dwellings.

Table 1 – 'High-Level' Strategic Assessment of UrbanGrowth NSW Proposal

2.2 Council Resolution – 15 December 2014

At its meeting of 15 December 2014, Council considered a report on the proposal by UrbanGrowth NSW for Parramatta North. Council resolved at this meeting to make a submission to the Department of Planning and Environment in relation to the proposal. The Council resolution raises the following broad, 'high-level' strategic matters:

1. **Heritage** – It is not clear how heritage buildings to be retained will be restored, including staging.
2. **Public Domain** – It is not clear how upgrades to the public domain, including access along the river foreshore, will be delivered, including staging.
3. **Recreational, Cultural and Social Needs** – Further analysis of the recreational, educational, cultural and social needs of the new community, including any impact on the provision of supporting infrastructure and public facilities is needed.
4. **Transport Infrastructure** – The precinct should be supported by Light Rail given the introduction of 4,100 dwellings and the new village centre.
5. **Sports Precinct** – Greater certainty should be provided to ensure compatible and complementary uses are located within the sports precinct as well as to safeguard visual prominence of the sports precinct from O'Connell Street. There is concern that the proposed B4 Mixed Use zone along O'Connell Street will set an expectation for residential development, which is considered to be an inappropriate and incompatible land use in close proximity to the stadium.

6. **Education** – The proposal has not identified any new school infrastructure, despite the introduction of 4,100 dwellings.
7. **Prioritisation** – The proposal should help to facilitate Council’s planning proposals in the Parramatta CBD area, which together with the UrbanGrowth NSW proposal will help to facilitate growth of the wider CBD area.

Further to the above, the Council resolution of 15 December 2014 requires this submission to raise any technical issues as identified by Council officers in a detailed review. These detailed issues are included in Part 3 of this submission. Moreover, in relation to open space provision, the Council also resolved as follows:

“Council request in its submission that the central public space area identified as “O/S 3” in the Indicative Layout Plan be dedicated to Council free-of-cost, including no reduction in section 94A contributions payable for future development in the precinct, and that it be zoned RE1 Public Recreation accordingly, subject to the removal of any legislative requirement to acquire the land.”

This issue is discussed in more detail in the open space and recreation analysis undertaken in Part 3 of this submission.

Part 3 – Detailed Assessment

This part of the submission provides a detailed assessment of the proposal as undertaken by Council officers. Council requests these matters be addressed prior to finalising this proposal. Council officers would be pleased to work with representatives from the Department of Planning and Environment and UrbanGrowth NSW to work through these matters in more detail. This part covers analysis in the following areas:

- Social Outcomes
- Open Space and Natural Resources
- Recreation Provision & Needs
- Stadium and Sports Precinct
- Heritage and Interpretation
- Tourism
- Traffic and Transport
- Urban Design
- Planning
- Economic Development
- Environmental Outcomes
- Flooding
- Contamination

3.1 Social Outcomes

3.1.1 Social Impact Assessment

A Community Needs and Impact Assessment ('Social Impact Assessment') is required as part of Parramatta City Council's *Social Impact Assessment Guidelines* for a proposal containing more than 100 dwellings (outside of the CBD). The proposal makes no reference to a Social Impact Assessment having been prepared despite reference to 'extensive stakeholder engagement and community consultation' being undertaken.

3.1.2 North Parramatta Population

Based on calculations by Council staff, the existing and projected population for the North Parramatta precinct, as it currently is, are outlined below:

- *Parramatta North population (2014)*
Residents – 13,276
- *Parramatta North population (projected to 2036)*
Residents – 13,910 = +4.77%

Given that 4,100 new dwellings, with a total of at least 8,000 new residents, will be created in the north-eastern section ('Cumberland Precinct') of the North Parramatta Urban Renewal area, it can be anticipated that the resident population in the Cumberland Precinct area will increase more than the ID data 'forecast' tool which has been used to reflect the projected resident population of 4.77% for North Parramatta for 2036.

Given this significant increase to forecast growth, a development of this magnitude requires modelling and specific information on estimates of the demographics of the potential future population.

3.1.3 Current North Parramatta Demographics

Demographics	Comment
30.8% of households had 1 person while 32.6% of households had 2 people	Currently one and two person households dominate this area. This should be considered when planning residential dwellings
29.0% of households are lone person households, 24.8% of households are couples with children and 20.6% of households are couples without children	There is a mix of household types currently living in North Parramatta. This mix should be considered in the planning of the Parramatta North precinct
52.6% of residents currently drive to work, while 16% catch the train and 6.9% catch the bus	Traffic considerations should be taken into account with the proposal to ensure that congestion can be mitigated against
5.3% (626) of residents in North Parramatta need assistance with core activities	Accessibility should be considered in the planning of these precincts

3.1.4 Community Services/Facilities

The location of the proposal is close to important social infrastructure such as:

- Educational facilities/opportunities
- Employment opportunities
- Medical facilities
- Community services
- Schools
- Shops
- Transport
- Open Space

However with an additional 4,100 residential dwellings anticipated, the impact on existing services needs to be considered so that existing residents can continue to be accommodated and new residents can also access sufficient services.

Adequate childcare and school facilities will need to be available to assist with young families given the increase in demand. These should be catered for in the precinct.

Further, a considerable number of companion animals such as dogs and cats will come into the area. Is there adequate space for the dogs to recreate and be safely off leash?

3.1.5 Construction Time Impacts

The timeframe for construction is estimated to be between 15 and 20 years. Modelling for this period of time will need to be undertaken to be able to adequately consider the potential positive and negative impacts for the new and existing communities throughout, and ensure adequate mitigation strategies have been considered to minimise construction impacts.

3.1.6 Proposed Building Heights Impacts

Access to adequate natural light improves people's health and overall wellbeing. Adequate modelling of the shadow effects needs to be provided so that a full understanding of the building heights can be reflected for all times of the day and a full understanding of the shadowing impacts can be gained/known.

3.1.7 Housing Costs

The price of residential dwellings is likely to continue to rise, especially in the context of the significant growth and development being proposed by this project. This will likely make it difficult for low to moderate income earning households who have been renting in the North Parramatta area to remain in this location.

3.1.8 Affordable Housing

No reference is made within the new Planning Framework report to Affordable Housing being provided in this development. With an insufficient amount of affordable rental and purchase properties available within the Parramatta Local Government Area (LGA), development of this size and scale and location is ideally placed to have an Affordable Housing component within the dwelling mix. Inclusion of Affordable Housing was also raised as desirable by stakeholders in the Stakeholder Engagement Program. Further, Action 2.3.3 of the Government's new metropolitan strategy, "A Plan for Growing Sydney" states that the "Government will... provide affordable housing in Government-led urban renewal projects and on Government-owned sites to meet the shortfall in affordable housing". Council is concerned that this has not been proposed in this precinct.

3.1.9 Recommendations

A Community Needs and Impact Assessment ('Social Impact Assessment') is required in order to more fully understand the potential issues and opportunities with this large scale development for the target market and the wider community.

At a minimum the Social Impact Assessment should cover:

- The projected mix of new residents – expected age profile, household types, and ethnic background
- Modelling the potential impacts (positive and negative) for the new community and neighbouring areas over the estimated fifteen (15) year time frame for construction of the 'Cumberland Precinct' in particular (e.g. communication strategies that will be put in place)
- How a sense of 'community and belonging' will be developed and supported for the large number of estimated 'new residents', as well as between the proposed development and existing community
- How social services infrastructure will likely be impacted, and the capacity of essential social services to be able to accommodate and support the needs of a large new community – e.g. education facilities including primary and high schools.
- How the development will accommodate accessible design principles to ensure accessibility for all people within the local community
- The potential impact of local large scale growth and public domain improvements on local housing affordability

Further, a significant opportunity exists to allocate dwellings for affordable housing within this precinct for key workers in local employment, for example administrative, cleaning and allied health staff working at the Westmead Medical Research and Hospital precinct, which is located close by.

3.2 Open Space and Natural Resources

The precinct features a permanent Grey-headed Flying Fox (GHFF) camp and approximately 1.4km of riparian corridor along Parramatta River and Darling Mills Creek which are of ecological significance. The precinct proposes 4,100 new dwellings and will facilitate both opportunities and conflicts with these ecologically significant features.

3.2.1 Parramatta River & Darling Mills Creek Riparian Corridor

The precinct is bounded to the west by the Parramatta River and Darling Mills Creek. This riparian corridor functions as an important transition between the upper and lower Parramatta River catchment and provides habitat for present threatened species (Grey-headed Flying Fox, East-coast Freetail Bat and Eastern Bentwing Bat) and an endangered ecological community (Riverflat Eucalypt Forest) listed under the *Threatened Species Conservation Act 1995*.

This section of Parramatta River is a 4th order stream, with Darling Mills Creek a 3rd order stream as defined by the Strahler stream ordering system whereby numbering begins at the top of a catchment. The following minimum vegetated riparian zones (VRZ) are required in accordance with the NSW Office of Water '*Guidelines for riparian corridors on waterfront land*':

- Parramatta River (40m)
- Darling Mills Creek (30m)

It is recognised that existing buildings of heritage significance are located within these recommended VRZ. However the location of new buildings, carparking and other significant infrastructure should be located outside of these VRZ to minimise impacts on riparian vegetation and threatened species, reduce the visual impact of the built form on Parramatta Park, and to provide a buffer zone in accordance with Section 2.4.7 (Biodiversity) of the *Parramatta Development Control Plan 2011*.

The study for the precinct recognises the environmental importance of this riparian corridor and aims to '*protect areas with high environmental value, such as the riverbank corridors*' and proposes a riparian corridor / foreshore park of varying widths along the Parramatta River and Darling Mills Creek. The proposed retention of B4 Mixed Use zoning along the proposed foreshore park is inappropriate in consideration of its environmental significance and does not reflect current and future landuse. It is also inconsistent with the zoning of similar riparian open space in the Parramatta LEP (The LEP that applies outside of the CBD).

3.2.2 Recommendations

- Rezone Parramatta River 40m / Darling Mills Creek 30m riparian corridor (O/S 2) to W1 (Natural Waterways) / RE1 (Public Recreation) excluding existing heritage buildings.

3.2.3 Grey-headed Flying Fox Camp

The Ecological Assessment prepared by ELA highlights the presence of a permanent Grey-headed Flying Fox (GHFF) camp consisting of 10,000 to 20,000 individuals based on seasonal movements. It is a known breeding and roosting site stated as '*critical to the survival of the species as identified in*

the Draft National Recovery Plan for the species'. This camp currently occupies a 600m section of riparian corridor north from Eels Place within the precinct.

Clause 6.4 (Biodiversity) of the LEP specifies provisions for the protection of significant fauna/flora on private land consistent with the PNUR Ecological Management Plan.

A recent review of the NSW Flying Fox Camp Management Policy (2014) has highlighted the significant conflicts between GHFF camps and residents in close proximity. The precinct proposes a number of new residential buildings in close proximity to the GHFF camp which will result in impacts such as noise, odour, sleep interruption, and droppings on private residences. This will create an unresolvable conflict between future residents and the existing GHFF camp.

It is also likely in the future that the existing GHFF camp may expand or move further south or north along the Parramatta River corridor in response to roosting availability. To minimise future conflicts between residents and the GHFF a sufficient buffer needs to be provided allowing for camp expansion through concentrating residential development to the east of the site and minimising development in the west of the site. A number of the proposed new buildings situated along the interface with the Parramatta River corridor should be relocated.

3.2.4 Recommendation

- Relocate 3 buildings away from the open space interface in F8 and F4 to reduce current / future environmental health conflicts with GHFF (see Figure 4 below).
- Add the GHFF Camp (Ecological Management Plan – Figure 8) to the 'Natural Resources—Biodiversity Map' in Parramatta LEP 2011.



Figure 4.3.5.2 ILP PNUR

Figure 4 – Recommended building relocations to avoid conflicts with GHFF

3.2.5 Open Space

There are four designated open space/park areas, marked O/S 1, O/S 2, O/S 3 and O/S 4, (refer to Figure 4 above for the locations) in the masterplan. O/S 2 forms part of the GHFF camp so it cannot be considered to be a formal recreational park. The masterplan should be amended to find an additional area within the site for development into a traditional park with picnic facilities, play equipment and the like.

3.2.6 Recommendations

- No park infrastructure should be constructed within the area marked O/S 2 as it is in proximity to GHFF camp.
- Provide additional playgrounds in O/S 1 and expand this open space area within the masterplan to offset the O/S 2 park area located under the GHFF camp.

3.3 Recreation Provision & Needs

The density proposed for this precinct is consistent with an inner city urban environment. There will be more people in a smaller space, requiring access to high quality recreation and open space opportunities that contribute significantly to their overall wellness and health attributes. The liveability of the area will have a major impact on those future residents.

The Landscape Re-zoning Report identifies key open space and recreation augmentation to the precinct based on a combination of environmental, heritage and desired development objectives and attributes.

As this urban renewal area is also home to an important heritage precinct its planned restoration and enhancement will likely increase visitors on a regional context to the site. Capacity of the recreation and open spaces planned for visitors, workers and residents will therefore be important in future planning. Further, the preferences and needs of future users will also influence the makeup of recreation and open spaces.

In addition to the needs of the new residents, many of the spaces within the Renewal Area are by nature regionally significant and destinational – including Parramatta Park, Pirtek Stadium, the Parramatta Memorial Swimming Pool and heritage sites. Activation and unlocking of the River itself will also likely enhance the area's appeal as a destination. As such, the area provides significant recreation, open space, cultural, entertainment and heritage attractors to people from across the City, Western Sydney region, Greater Sydney and beyond. Their capacity to meet the needs of local residents and regional users must be assessed.

3.3.1 Commentary on Recreation and Open Space proposed

The Landscape Re-zoning Report provides details of a number of site constraints (heritage and environmental) alongside development objectives which form the basis of what space is to be dedicated to recreation and open space, translated into a landscape master plan.

Chief recreation and open space features of the proposal include:

- Maintain significant view vistas and visual corridors
- Continuous riparian corridor and riverside walk alongside Eastern bank of the River with passive recreation embellishment (O/S 1 and O/S 2)
- Heritage Oval Park – Village Green (O/S 3)

- Entrance Park on Fleet Street (O/S 4)
- Retention and enhancement of curtilages to heritage buildings
- Various restoration to riparian corridor segments

The landscape master plan has a number of attractive and considered features using the limited spaces available. It should be noted that the remaining space for recreation (approximately 4.46 ha out of 40 ha or approx. 11%) is quite small and particularly small for a population of 8,000 plus residents (approximately 0.56 ha of open space per thousand people).

Traditional open space guidelines suggest at least 2.83 ha per thousand people and 9-15% of total non-industrial land should be allocated to open space. On this measure, the proposal is fairly low and would rely on residents accessing nearby local and regional facilities and open space to meet their recreation and open space needs.

Fortunately residents will have easy access to nearby Parramatta Park (formal and informal sports areas, pathways, seating, BBQ and picnic facilities etc) and the Stadium and Sports Precinct (pathways, river foreshore, swimming pool, formal and sports field (Old Kings Oval)). As previously noted, these precincts have regional context and host users from a much larger catchment. Their capacity to also handle a proportion of "local" use by 8,000 new nearby residents in addition to significant numbers already placing demand on those park services may require further planning and consideration of capital works, maintenance and capital replacement programs within those areas.

Typically, the broad recreation and open space needs of a community will translate into an array of assets (some with programming and services):

- Formal Sporting Fields
- Informal ball sports and multisport areas (including tennis)
- General play and fitness (playgrounds and outdoor fitness)
- Shared paths and trails (walking and cycling)
- Passive recreation (parks, natural areas, gardens)
- Aquatics (indoor/outdoor)
- Indoor sports and recreation
- Private recreation (i.e. commercial gymnasiums)
- Protected areas (conservation zones)
- Activation zones (for events, markets and similar)

The landscaping embellishments proposed will provide an area of high amenity to complement the remaining heritage buildings and proposed new buildings. There are a number of features which will certainly provide some amenity for residents and visitors, including:

- Shared pathways that provide excellent connections and are well integrated with natural elements such as the river riparian corridor and with exercise stations, seating and drinking fountains.
- A network of exercise stations along the shared pathway series will also benefit most age demographics, as long as the equipment chosen considers a broad range of physical capabilities and interest.
- Gardens, natural areas and views vistas – provide suitable quiet and natural spaces which are valuable for residents wishing to connect with green spaces.
- Interpretive play, public art, BBQ and picnic facilities – interesting spaces for children and families as well as other age groups and profiles.
- Informal play – a number of spaces such as the Entry Park, Informal Lawn and the Village Green Oval which provide passive informal park areas that might allow for various outdoor activities.

- Activation Spaces – A number of locations could be further activated for local neighbourhood events such as markets, open air cinema and community events. O/S 3 is the most suitably sized and well located for such activation, but there may be a clash of uses with formal and informal sports.
- Children’s play – The Report does not specifically identify playgrounds for any of the areas. Specific playground amenities for young families will be important to this community and also visitors to the heritage precinct. A population of this size will require suitably large scaled play facilities within the precinct.
- Formal Sports – The Village Green oval (O/S 3) has been maintained within the master plan. It is a very small sports field (approx. 110 x 75 metres) and will require augmentation and embellishment to meet Council’s requirements.

Given the small size of the Village Green (O/S 3), it is unlikely to meet the full range of recreational sporting needs generated by the new community. It is clear therefore that this new community’s formal and informal sporting needs will impact on neighbouring sportsgrounds in the LGA such as nearby Belmore Park, Doyle Ground, Old Saleyards Reserve, Dan Mahoney Reserve, Old Kings Oval (Stadium Precinct) and Parramatta Park fields (e.g. Coleman Oval and Long Paddock should they be upgraded). Many of these facilities are already close to capacity and under stress due to significant population growth in and around the City.

Solutions to increase the capacity of sportsgrounds may include the enhancement of playing surfaces, adoption of synthetic playing fields and other site improvements which will allow increased capacity for use. This is where section 94A contributions from the development could assist with funding these upgrades.

The new community’s recreation demand for indoor recreation and aquatics will add to the considerable existing need identified for the City overall. The nearby Parramatta Memorial Swimming Pool will provide interim outdoor aquatic experiences but it is well known that there is a lack of indoor facilities within the LGA and concerns over future capacity of the existing pool to meet increasing demand for various aquatic trends. Council continues to investigate options for future provision of indoor recreation and aquatics in the City. Options include re-developing the current swimming pool site.

It should be further noted that the current swimming pool has been located at this site for over 50 years and is well utilised by the community and is much loved. Council has undertaken extensive capital investment over many years, including a \$9.8 million refurbishment in 2008/2009. Changing the nature of this facility or relocating it (should that ever be proposed) would require extensive public consultation. It would also require appropriate and significant non-council funding contributions by the NSW Government or developers to deliver any changes and ensure the community has suitable provision and amenity into the future.

Council notes also that the Parramatta Memorial Swimming Pool’s car park and adjoining Parramatta Park car park in the south of the Stadium and Sports Precinct are earmarked for general recreation spaces (re-vegetated foreshore). In a separate report on the Stadium and Sports Precinct, further comments have been supplied, however it is important to note that the car park is extremely important to the operation of the Swimming Pool in its current configuration. This zone is implicitly connected with the swimming pool facility and even sporting fields such as Old Kings Oval. Therefore it recommended that no change occur to the car park unless it is part of any agreed changes to the public swimming pool.

The new community and surrounding residents may also create demand for private recreation facilities such as a commercial gymnasium. Such facilities are often easily catered for within a mixed use commercial and residential development envelope and the market will likely identify and meet that need accordingly.

UrbanGrowth NSW is proposing to zone the Village Green (O/S 3) as RE2 Private Recreation. The justification provided for this proposed zoning is that it will offset the land within the Sports and Leisure Precinct that is currently zoned RE2 Private Recreation that is proposed to be rezoned to B4 Mixed Use. Further, UrbanGrowth NSW states that the *“application of the RE1 Public Recreation zone is not proposed as at this stage no appropriate government authority has agreed to the future ownership and management of the park.”*

Given that the Village Green (O/S 3) area has been identified as public open space and will become critical to the future open space needs of the new and existing local communities in North Parramatta, it would seem appropriate that this area should be zoned RE1 Public Recreation and dedicated to Council in the long term. This dedication should be done at no cost to Council, including no reduction in section 94A contributions for future development in the precinct and removal of any legislative requirement to acquire the land.

Likewise, consideration should also be given to O/S 1, O/S 2 and O/S 4 being dedicated as public open space, zoned RE1 Public Recreation (subject to no cost to Council, no reduction in Section 94A contributions and removal of any requirement to acquire the land) and not left as B4 Mixed Use zoning for consistency of management and land use throughout the precinct.

3.3.2 Recommendations

- Support broadly the master plan for recreation and open space provided by UrbanGrowth NSW – in particular the activation of river foreshore connections that serve the broader community.
- That the central Village Green Oval identified as “O/S 3” in the Indicative Layout Plan be dedicated to Council free-of-cost, including no reduction in section 94A contributions payable for future development in the precinct, and that it be zoned RE1 Public Recreation accordingly, subject to the removal of any legislative requirement for Council to acquire the land.
- That Council and UrbanGrowth NSW further consider which other recreation and open space elements (O/S 1, O/S 2 and O/S 4) should be zoned RE1 Public Recreation and dedicated to Council (free-of-cost, no reduction in section 94A payable and removal of any legislative requirement to acquire the land) and a plan for who and how these spaces will be managed and maintained going forward.
- That UrbanGrowth NSW consider amending the plans to better account for play and design elements for children and young people.
- That UrbanGrowth NSW explore options to include informal multi-sport play features (e.g. outdoor courts) within the precinct footprint.
- That Child and Young People Friendly by Design principles are adopted within the development framework of each development and also in the planning of recreation and open spaces.
- That Council supports further investment by the State Government to fund enhancements and ongoing maintenance of Parramatta Park (heritage and recreation zone west of the river) to cater for the likely strong additional demand that this new community will place on the Park’s infrastructure.

- That Council does not support any significant encroachment into the Stadium and Sports Precinct or significant reliance on its open space to meet the needs of the new community given its dual role as an activation and event precinct.
- That enhanced aquatic and recreation facilities are required to service the new residents of Parramatta North along with the other nearby growing City Centre areas.
- That significant non-council funding will be required to enhance the aquatic and recreation provision available and in particular should the existing site be required to relocate in the future, further non-council funding be secured to deliver suitable facilities at a desirable location for the community elsewhere.
- That the Swimming Pool car park is retained whilst the pool remains in operation on the site.



Figure 5 – Artist's Impression of the main open space in the Cumberland Precinct

3.4 Stadium and Sports Precinct

3.4.1 Background

The value of Pirtek Stadium and its event activation function to the City has been enhanced significantly in recent years with the establishment, success and popularity of the Western Sydney Wanderers. Alongside the Parramatta Eels, the two primary hirers of the venue generate significant visitation, cultural, social, recreation and economic benefits for the City. Furthermore, the attributes of the City with the Stadium located close to highly accessible public transport and an entertainment precinct provide the Eels and Wanderers followers (and away fans) a substantial and overall experience that is highly desirable.

The growth of the Stadium and number of events brought to the City feeds the growth of the City and vice versa with many mutual benefits being shared.

Furthermore, the NSW Government's published stadia strategy states its desire to identify and invest in a single major sporting venue for Western Sydney to support its other key stadia infrastructure of ANZ Stadium, SCG and Allianz Stadium. Other suburban stadia is then planned to be rationalised and downscaled over time.

Pirtek Stadium is well placed to be identified as the NSW Government's location of choice for significant investment given the City's complementary offerings and strategic location. Should it not be supported for such future investment, its future and the key benefits brought to the City from activation currently enjoyed through Eels and Wanderers games will be lost.

It is therefore critical that for Pirtek Stadium to be identified and receive the substantial funding needed, that the case is made that its plans for the nexus of Stadium, surrounding precinct and City infrastructure offer the most compelling and sustainable proposition.

Whilst recent announcements and commitments provide some suggestion that there is government support to invest in Parramatta Stadium, a number of hurdles remain.

Challenges and opportunities that must be addressed to enable this include:

- Resolve fragmented and disjointed land ownership within the precinct.
- Develop a precinct solution – an integrated precinct master plan that delivers a world class stadium desired by fans and hirers (potential future and current) in addition to advancing the brand and reputation of the City on a domestic and international scale – all the world's most successful stadiums have effective, dynamic precincts that aid to the destination attributes of the event itself.
- Such features would focus on enhancing the experience provided to all involved, including superior facilities for players and officials, superior facilities for spectators, broadcasters and the media, best practice use in technology to connect people and create an exciting atmosphere, and superior non-match activation before and after the event.
- Resolve current land use and asset mix that better supports an expanded stadium (increased crowd capacity) and complementary supporting precinct asset mix
- Resolve current entry and exit issues for pedestrian and vehicular traffic
- Enhance transport and pedestrian linkages to the city, parking and public transport
- Enhance the entertainment and complementary uses surrounding the stadium
- Develop a model that is economically sustainable and delivers desired financial outcomes for the venue owner/manager and hirers
- That activation within the precinct can be ongoing seven days a week
- Integrate Light Rail into the precinct

Council continues to play a strong advocacy role on behalf of the City supporting the various stakeholders and land owners to the ultimate objective of an enhanced Stadium and complementary and integrated precinct.

Further to the above, Council is the lessee of Parramatta Park land which the Parramatta Memorial Swimming Pool and car park are located. This is a significant community asset, providing important amenity to the community for over 50 years and having benefited from substantial capital investment and upkeep during that time by Council.

Council also has identified the growing need of its community for indoor recreation and aquatics which currently there is none within the local government area or close to the rapidly growing city CBD. There have been many discussions regarding potential for this to be located within the Stadium and Sports Precinct should there be a redevelopment of the existing swimming pool.

3.4.2 Comments

Greater certainty should be provided to ensure compatible and complementary uses are located within the sports precinct as well as to safeguard visual prominence of the sports precinct from O'Connell Street. There is concern that the proposed B4 Mixed Use zone along O'Connell Street will set an expectation for residential development, which is considered to be an inappropriate and incompatible land use in close proximity to the stadium.

It is clear that further detailed planning and consideration of major challenges and opportunities is required to inform a more considered strategy and planning proposal supporting an integrated world class stadium precinct. The key stakeholders agree and are in the process of undertaking these further investigations, which may lead to a different planning proposal for the Stadium and Sports Precinct.

Additionally, development objectives for the Cumberland Precinct (i.e. residential development yield) should not rely on or be overly tied to the Stadium and Sports Precinct given the specific and unique drivers associated with managing a significant event and entertainment precinct, complemented by supporting commercial and community uses.

Council submits that Urban Growth should consider how to address the following matters:

- The mixed use zone in front of the stadium allows for residential development in front of the stadium – Council does not believe residential use in such close proximity to a well utilised stadium is appropriate (future issues of noise, traffic and other impacts on those potential residents and so forth). Any type of development in front of the stadium is likely to diminish the opportunity for an attractive frontage to and circulation around the Stadium, inhibiting its future operation and function.
- The zoning of the Stadium (RE2 Private Recreation) and immediate surrounds (RE1 Public Recreation) do not allow for any complimentary commercial uses. Further assessment of what the right types of complementary development and activity might be for this precinct, and therefore what zoning and built form is best suited for those identified purposes, should be undertaken and implemented through a masterplan for the site.
- A car parking and pedestrian traffic plan is critical to solve current access issues that will only be exacerbated if the stadium is expanded to 35,000 plus capacity (egress for medium to large events is a significant concern given most pedestrian and vehicles all access the site from a narrow north eastern aspect – at least 180 degree access and separated vehicle and transport egress is considered best practice).
- Integration of light rail, bus interchange and other civic space would be beneficial to the precinct's function as a major entertainment precinct.
- Implications for the community swimming pool and whether future recreation needs are feasible to be delivered within the precinct.
- Access and parking for the community swimming pool and other community and commercial spaces within the precinct given the proposal to remove and then revegetate over the southern car park that services the swimming pool and open spaces.
- Further investigations recommended into identified heritage significant land to the north of the stadium and west of the Leagues Club car park (site of old Water Mill and Races) to better clarify whether this zone could also have development potential complementing the stadium and precinct (currently not considered for rezoning)

3.4.3 Recommendation

- That Urban Growth address the above matters.

3.5 Heritage and Interpretation

The following concerns are raised in relation to the baseline assessment of social significance for the precinct:

- The application of criteria for the assessment of significance is not specific enough. The assessment does not adequately justify the significance of the various sites within the precinct. Reference to the report, 'The Cumberland Hospital Fleet St N Parramatta NSW Archaeological Management Plan (Historical Sites) for Conservation Management Plan' (Edward Higginbotham and Associates, March 2009) would help to improve the analysis.
- The report does not set out a rigorous process or criteria for assessment for re-use and associated implementation.
- The report does not use many specific references to actual community groups or propagate a coherent argument relating to which buildings were significant to which groups and why.
- The groupings of significant sites seemed to be aligned broadly with general areas like the Female Factory and Asylum, but the report needs more detail about the significance of individual buildings spread across these precincts. Earlier reports have sited between 10 and 18 distinct precincts in this area. This report has fewer distinct areas than others and the significance of some of these are not mentioned in the report.
- There is no clear outline on how the ongoing management of sites stipulated for re-use will be conducted. Who will be responsible? How will money be found to keep them going? This should be of special concern for sites of exceptionally high significance.
- There could be more of a role for Council who already employs professionals across the museum, archive, interpretation, and tourism sector to provide professional assistance and management for the site more generally. Funding could be dedicated to this purpose.
- Specific recommendations of the framework require more clarity.
- The methodology in the report is very specific and too limited.
- There are important cultural connections that the Darug community members have with several places throughout the area, and need to be consulted with.
- Council is not aware of the people who have been consulted, for example ATSIAC or DRP, nor the feedback that they have given. Adequate consultation must be undertaken in accordance with ICOMOS and Burra Charter guidelines.

There is concern over the lack of detail in the proposal about the process for how significant heritage buildings will be restored throughout the life of the development. Further detail is needed in terms of the Government's staging program for development and how this will facilitate restoration of heritage buildings in the precinct. Council's support for any uplift in yield in this proposed rezoning is subject to a clear commitment and program (including funding) from Government for heritage restoration.

3.6 Tourism

There are significant opportunities for facilitating tourism in this development, particularly in the reuse and restoration of significant heritage buildings, proximity to the Parramatta CBD and stadium precinct, and also activation and access to the river. These are discussed in more detail below.

3.6.1 Cumberland Precinct

The following comments are provided in relation to tourism potential in the Cumberland Precinct:

- The Cumberland precinct comprises a number of significant heritage sites with distinct but overlapping stories.
- Together the sites have the potential to attract high volumes of visitors, with associated needs, including food and drink, information, lighting, parking, seating, shelter, toilets, transport and way finding.
- It is important to strike a balance between preserving the heritage sites and securing their long term sustainability.
- It is recommended that some sites be maintained in their current condition and interpreted through organised tours or self-guided tours (with handheld devices), while other sites are adapted for reuse.
- Although the heritage sites have connections with incarceration and the like, it is important that such interpretation or reuse appeals to a broad range of visitors, including families. The emphasis should therefore be on education and entertainment. However, there may be some opportunities for more niche visitor activities, such as ghost tours.
- There may also be potential to hold special events, but this will require appropriate infrastructure.
- To assist with the management and marketing of the heritage sites it is recommended that a single operator is responsible for all sites, with some sub-contractors, for example, food outlets, reporting to that operator.
- A larger not-for-profit heritage organisation, such as Sydney Living Museums or a commercial operator with a track record of managing a heritage site would be well placed to operate the sites, rather than a community based historical group with no experience of visitor management.

3.6.2 Sport and Leisure Precinct

The following comments are provided in relation to tourism potential in the Sport and Leisure Precinct:

- There is the potential to increase the length of stay and spend of visitors to NRL and A-league games, and special events by increasing the range of activities around Pirtek Stadium, for example by providing eating and drinking outlets.
- Improved events infrastructure at Pirtek Stadium would enable the stadium to attract large scale events, such as concerts.
- Consideration should be given to improving the approach to the stadium.

3.6.3 Old Kings School

The following comments are provided in relation to tourism potential in the Old Kings School Precinct:

- The heritage site at Old Kings School precinct, and its proximity to the Riverside Theatre provides an opportunity to develop a new arts centre for Parramatta.
- To ensure the long-term sustainability of such a development, it is recommended undertaking research into potential visitation numbers, and identifying potential commercial uses, such as sub-letting to commercial design companies and arts organisations.

3.6.4 Parramatta Park

The following comments are provided in relation to tourism potential in Parramatta Park:

- The Parramatta Park Trust is currently developing a Master Plan that will guide the future development of the park, including opening the Dairy Cottage for tours. The plan should be considered as part of the overall strategy for the Parramatta North Urban Renewal precinct.
- In addition, there is potential for new activities and attractions, such as cycle hire and a “city farm”.
- Cycle hire could be run by a commercial operator and enable visitors to cycle around the park and Parramatta River.

3.7 Traffic and Transport

Concerns are raised in relation to the proposed planning framework from a traffic and transport perspective.

The study area for the traffic model does not extend far enough to the south or east to include critical intersections and local roads. If the RMS Mesoscopic model for this area is available then it is recommended that this be used for the traffic modelling. Further investigation is required in regards to upgrade works for the intersection of Cumberland Highway, Church Street and Windsor Road.

The proposal includes up to 9,770 car spaces adjacent to a road network that already has major intersections at capacity during peak periods. To address this challenge, public transport (particularly light rail), bicycles, and walking are critically important. However, radical solutions that go further are required to manage the levels of congestion that are likely to result from the proposed development.

It is recommended that vehicle access onto the network be constrained by limiting the number of exit points and ensuring that they are controlled by signals. Any excess vehicles in peak periods travelling onto the network would then effectively be stored within the site (queuing to exit) rather than queuing on main roads. Additional queuing on main roads is to be avoided as it can result in queuing across intersections (causing increased travel times in all directions) and can effect bus lanes and increase illegal use of bus priority measures (the term gridlock is often used). This strategy needs to be supported by substantial improvements to public transport and a design to minimise the effects on existing residents and organisations in the Fleet Street area.

3.7.1 Westmead access

The proposed development should include access to Westmead for pedestrians, cyclists, buses or taxis. Westmead is a substantial centre of employment and also has the most easily accessible railway station for the proposed development. The Traffic and Transport Review does not make any reference for this access to be provided.

3.7.2 Proposed traffic works in the Traffic Study

The proposed traffic works are considered to be deficient in the following ways:

- The proposed widening of Church Street between Factory Street and Grose Street (to be undertaken by applicant) may not be able to be achieved for heritage reasons, particularly at the cemetery north of Pennant Hills Road.

- Concerns are raised with the proposed partial signal for Church Street/Board Street, as it is considered to provide no benefit to the network, or increase in capacity, and would increase delays on the main road.
- The proposed additional right turn lane from Church Street to Barney Street is supported but will require land acquisition.
- The Traffic Study notes that the Windsor Road bridge over Cumberland Highway is proposed to be widened as part of the Western Sydney Regional Ring Road. However, the project is unfunded and initial investigations indicate that it is not feasible.
- Concerns are raised with the proposed one lane roundabout at the intersection of Fennel Street and O'Connell Street as it would increase delays on the main road network and reduce capacity. Concerns are also raised about the two lane roundabout as it would provide poor pedestrian safety and amenity, and require substantial land acquisition and probably building demolition in an area of special character.
- The proposed one lane roundabout at the intersection of Dunlop Street and O'Connell Street is appropriate in the initial stages of development, but the intersection should be partially closed as development proceeds (see comments above).
- The list of proposed works in the Draft SEPP Planning Report is different to that in the Traffic Study.

3.7.3 Traffic Modelling from the Traffic Study

The following concerns are raised in relation to the traffic modelling undertaken in the Traffic Study:

- The study grossly underestimates existing traffic queues at key locations, particularly westbound on James Ruse Drive/Cumberland Highway.
- The study indicates a direction split of 27% residential and 35% commercial travelling to the south. Accordingly, the model should be extended to include the intersection of the Great Western Highway and O'Connell Street. Similar extension should be made to the east to intersections as far as James Ruse Drive.
- Traffic model does not include cumulative impact of other development in the area.
- Traffic model does not consider through traffic in local residential streets such as Prince Street, Bellevue Street and Isabella Street, North Parramatta.
- The theoretical capacity comparisons for mid-block locations are not relevant because it is the intersections in the network that determine the capacity.
- Origin-Destination Surveys indicate significant traffic volumes travelling through the site. It is proposed to stop this through traffic but it is not clear if or how this has been included in the traffic model.
- The report does not adequately justify the low traffic generation rates, particularly as the development is currently poorly serviced by public transport and there are no confirmed improvements as part of the application.

3.7.4 Pedestrian and cycleway connectivity

The following comments are made in relation to pedestrian and cycleway connectivity:

- Existing context should include NSW Cycling Futures which highlights Parramatta as a key strategic area for short trip cycling which the study area falls within.
- Bicycle routes maps used show routes which are not endorsed by Council (Figure 3.13) and are outdated (Figure 3.14).

- The proposed route is part of the Parramatta Valley Cycleway and is strongly supported. A pedestrian/ cycle bridge should also link the side with the northern side of Toongabbie Creek and connect to Kleins Road.
- An east/west cycle connection to Westmead and Church Street should also be provided.
- A separated cycle route should link Parramatta Stadium to the Parramatta CBD.

3.7.5 Bus and Shuttle Bus Transport

Bus services frequencies are stated to be approximately 1 minute or less in peak periods. The expansion of the shuttle bus route may be problematic as it will go outside the CBD bus region free area and may not be supported by bus service providers.

3.7.6 Light rail

There is no mention of light rail in the proposal, including station locations, catchments or routes. This is a concerning omission as this will significantly improve the public transport provision for the development. While the report states that the site is currently too far away from the Parramatta Transport Interchange to be considered a Transit Oriented Development (TOD), a light rail station in the precinct will enable TOD to be investigated which can have positive outcomes for access into the site and reduce the required parking rates. It is essential that a light rail corridor is future proofed within the development in terms of easement of tracks/stations and associated services.

The report mentions Travel Demand Management (TDM) strategies which include car share and travel plans. These TDM strategies will be further strengthened by including the future light rail routes and stations in the report.

3.7.7 Travel Plans

A travel plan is needed for the whole precinct. This should include:

- A free bicycle hire scheme just for the development's tenants and home owners. At least 200 bikes and lockers provided on a smart card access system for the residents across the site.
- 20 car share cars should be provided to residents just for the development site on a similar basis to 'Go Get Cars'.
- Promotional Opal cards should be offered to all new residents with \$200 of credit.
- Sydney Buses should be given an initial subsidy from the developer to offer more services until patronage levels increase.

3.8 Urban Design

3.8.1 Context

The following comments are made in relation to the surrounding context:

- The existing context should be indicated in the indicative layout plan.
- The existing context/proposed development on a block by block basis should be integrated in plan and section within the DCP.
- An analysis is needed to illustrate an appropriate transition of scale could occur between the proposed towers and the existing/future built form outside the master plan area. The

appropriate transition of scale must be addressed in the DCP (both in objectives and controls). There are significant strata holdings (both RFBs and townhouse developments) in the immediate context which are unlikely to change in the long term – this must be acknowledged in the master plan and DCP controls.

- Future towers - Should this development go ahead as proposed it is likely to catalyse similar towers on sites in proximity to, but outside the master plan area. Aspects such as inter-building separation of future towers both within and outside the master plan area must be considered. From Council's urban design perspective – towers must ensure appropriate levels of sky when viewed from the public domain. A contiguous presentation of tall towers is an inappropriate outcome. It is unclear how the separation is achieved between towers within the master plan area and those that may be developed in close proximity to the master plan area.
- The Sports and Leisure Precinct requires more resolution and concern is raised about its proposed form ie proposed uses, form and resultant spaces/interface with neighbouring sites.

3.8.2 Existing DCP Controls

The following comments are provided in relation to existing DCP controls and built form:

- The existing provisions of the DCP apply unless specific exception is made otherwise. These exceptions must be clearly highlighted in a summary report.
- Building length must not exceed more than 65m for 3-4 storey podium/street wall and 45m for residential towers.
- Given there is a DCP street frontage control for the City Centre (North), it is recommended that a similar street frontage height no higher than 14m with an upper level setback of 4m is considered at the periphery of the master plan area - especially along O'Connell St and other existing local street interfaces. This is to facilitate a street wall no higher than 3-4 storeys and to create a coherent streetscape.
- The existing DCP has a predominant street wall of 3-4 storeys (max 14m) for most of the City Centre with a upper level setback for taller built form. It is suggested that a similar approach is maintained for consistency as the Parramatta North Urban Renewal Area would be effectively an urban extension.

3.8.3 Proposed height, yield and DCP controls

The following comments are provided in relation to the proposed height, yield and DCP controls:

- An appendix containing the area schedule with the efficiency of building envelope to GFA should be included in the submitted material. Similarly the assumptions for height should be indicated.
- Lift overruns/rooftop services for buildings 55m and above are expected to be integrated with architectural roof features - therefore they should not be included in maximum height allowances. This is to prevent the conversion of the lift over-run allowance into additional floors.
- Street frontage controls should be indicated in street typology as in the DCP – this currently stops at the building line. Again a consistent approach with the City Centre street frontage controls is recommended.

- The floor plate/ Gross Building Area (measured to the external facade of the building, including balconies) of residential towers should be limited to a maximum of:
 - 800sqm for residential buildings up to 75m in height (approx. 25 storeys).
 - 950sqm for residential buildings which are 75-105m in height (approx. 25-35 storeys).
- Street address of residential towers: All residential towers must have direct access from a public street. Block B appears to have a 20 storey tower without a street address. Block F8 does not have street address and is accessed off a private road.

3.8.4 Public Domain Plan and Set-out

A Public Domain Plan must be developed based on the survey. This should accurately set out all elements of the public domain including streets, open spaces and riverside park, as well as easements for light rail, drainage and services. The staging and delivery/responsibility matrix should be indicated. Any variations should be to an equal or better specification.

The existing western end of Albert Street (No Through Road) is significantly higher than Fleet Street. This transition of grade should be detailed with respect to accessibility and appropriate grades.

3.8.5 Design Excellence process and DEAP review

There appears to be some confusion about the difference between Council's 'Design Excellence' process and the 'Design Excellence Advisory Panel' (DEAP) review process – they are quite different. Clause 22B 'Design Excellence' (ie design competition process) for the CBD should be extended to this precinct.

Council does not support the condition that only RFBs 10 storeys and above are to be reviewed by the DEAP. All RFBs and adaptive heritage developments must have a DEAP review, unless they undertake a Design Excellence process (in accordance with clause 22B of City Centre LEP). This is consistent with Council's current controls and practices for the CBD.

3.8.6 Identified public benefit

Height and development yield proposed must be commensurate to identified public benefit – this includes, but is not limited to:

- Restoration of heritage/adaptive re-use of existing heritage.
- Public domain provision/upgrade - A detailed list of public domain deliverables with an area schedule (referenced to a Public Domain Plan) should form part of the proposal.
- Increased affordable housing provision/ contribution – more detail is needed on this aspect. It is strongly suggested a significant provision of key worker housing is accommodated within the precinct given the proximity of the Westmead Health precinct.
- Community facilities/infrastructure – given the proposal for 4,100 dwellings, commensurate provision of social infrastructure such as schools, libraries and community facilities should be indicated. This should be located and quantified and form part of the proposal.
- Public art provision – a public art strategy should be included as part of the proposal.

3.9 Planning

3.9.1 Technical Planning Review

The following technical planning comments are provided in relation to this proposal:

- It is noted that GFA controls are proposed instead of FSR controls and that this is a reflection of the detailed urban design assessment that has been pursued to formulate the Indicative Layout Plan. This approach is supported on the condition that any GFA controls are included in the LEP.
- There is concern about use of the B4 Mixed Use zone the Sports and Leisure Precinct directly adjacent to the Stadium, as this will set an expectation for residential development, which is considered to be an inappropriate and incompatible land use. An alternate zone should be considered. This should be informed by a more detailed master planning process for the Stadium precinct.
- The Planning Report (at Section 2.4) incorrectly states that Council has identified the area to the north east of the precinct, generally along O'Connell Street, as a potential Urban Activation Precinct. This is not the case and should be corrected.
- It is noted that Section 94A contributions will be payable for the precinct. Further, it is noted that payment of these contributions will be in *addition* to the infrastructure upgrades identified in Table 8 of the Planning Report. This is supported.
- Table 8 of the Planning Report identifies 'Regional Infrastructure Contributions', although it is not clear what these will be. Further clarification is needed.
- Section 4.3.5.10 – Built Heritage of the Draft DCP states all buildings of high heritage significance will be retained, "apart from two". This is inconsistent with Table 4 of the Planning Report which states that *all* buildings of high heritage significance will be retained.
- Development Lots SB, SC and SD in the Draft DCP appear to be missing heights (in storeys) for part of these sites. These should be inserted.
- Clarification is sought on the proposed legislative mechanism to be used to formally amend the *Parramatta DCP 2011*, noting that the proposal includes the insertion of a new Section 4.3.5 - Parramatta North Urban Renewal into Part 4.3 - Special Precincts of the DCP.
- Further analysis is needed to assess the impacts of where the proposed B4 Mixed Use zone penetrates the surrounding context along the eastern boundary, including proposed heights and land use interface (see also Urban Design comments).

The Draft SEPP (which will amend the LEP) and the Draft DCP should be amended to reflect the broad comments provided in this submission. Council requests the opportunity to further review these draft planning controls prior to finalisation.

3.9.2 Prioritisation

Council officers have previously raised the issue of the prioritisation of this project over other planning proposals in the Parramatta LGA and also the consolidating LEP with the Department of Planning and Environment and also UrbanGrowth NSW. Council's planning proposals, which are well advanced in the plan making process, will accumulatively help deliver more than 2,000 dwellings and 45,000sqm of employment generating floor space as well as result in only one planning instrument applying to the Parramatta LGA. Council's planning proposals should also be given priority by the Department and it is suggested that any amendment made to give effect to the Parramatta North proposal would be made more seamlessly if all the existing planning proposals are made prior to this occurring.

It is recommended that this proposal help to facilitate Council's other planning proposals in the Parramatta CBD area, which together with the UrbanGrowth NSW proposal will help to facilitate growth of the wider CBD area.

3.10 Economic Development

3.10.1 Summary

The analysis provided is considered to be complete, thorough and is generally supported from an economic development perspective. It provides a good understanding as to the role of the development within the hierarchy of centres and retail.

It is noted that the economic impact assessment has considered the economic contribution of the precinct to the Parramatta and NSW economies. The report notes that the precinct comprises a construction value of approximately \$2.2 billion over the projected 15 to 20 year period of redevelopment. Of the \$2.2 billion construction spend, the modelling estimates that \$1 billion will be generated in industry output for businesses within the Parramatta Local Government Area (LGA). Once occupied, the precinct is estimated to directly generate a total industry output of \$805.3 million per annum in Parramatta.

The proposal provides for broad retail usage information, given the 15 to 20 years development timeframe. In summary, the precinct will generate:

- 4,000sqm of new retail space – new Village Centre (Cumberland Precinct)
- 34,000sqm of mixed use (likely to be predominantly commercial) (Sport & Leisure Precinct)
- 28,000sqm of re-adaptive heritage buildings (Cumberland Precinct)
- Approximately 4,100 dwellings (Cumberland Precinct)

3.10.2 Retail demand

The additional retail space is not likely to impact on the existing retail hierarchy or the retailers in the surrounding neighbourhoods. The following is a calculation of the square metre retail demand for the proposed new dwellings:

- New dwellings = 4,100
- Pop per dwelling = 2.1 pp (2011 average for North Parramatta)
- Total est. population = 8,610 persons
- Est. of retail space per capita = 2.2 sqm
- Total est. demand for retail space = 18,942 sqm

As the precinct is only proposing 4,000 sqm of new retail space, it is anticipated that residual demand growth will support new and proposed retail floor space in existing surrounding centres.

3.10.3 Commercial demand

The study does not address the demand for the additional commercial space other than mention that the health sector jobs currently located in the Cumberland Precinct will relocate.

It is anticipated that the growth of the Parramatta CBD as part of 'A Plan for Growing Sydney' will increase demand for commercial office space over the precinct's 15 to 20 year construction horizon. It is desirable for the precinct to provide more commercial floor space to help facilitate jobs growth in Parramatta.

3.11 Environmental Outcomes

3.11.1 Energy and Water Utility Infrastructure

The scale of the development is expected to place significant pressure on existing energy and water infrastructure. The report prepared by Hyder Consulting in relation to infrastructure and flooding suggests that around \$15 million of works will be required to upgrade existing water, wastewater and electricity services to meet the site's future needs.

Council would strongly encourage the consideration of alternative infrastructure options for this site, including the potential for decentralised energy and water systems, or other alternative forms of supply. Innovative solutions, such as precinct scale energy and water systems, have the potential to reduce costs (both for the developer and ongoing users of the site), increase the value and saleability of buildings, and improve the resilience of the development against future supply issues and/or rising utility costs.

The timing of the Westmead Hospital redevelopment also provides a unique opportunity for UrbanGrowth NSW and Health Infrastructure to work together in order to deliver better outcomes for both precincts. The co-location, scale and nature of planned works provide a substantial opportunity for alternative utility servicing options to be considered jointly, to deliver a more cost effective and sustainable solution to both developments.

Additionally, the Rosehill Recycled Water Scheme (located at the edge of the Parramatta CBD) offers a specific opportunity to potentially address water supply needs for the precinct. The scheme has existing capacity to supply recycled water to future development in and around Parramatta, providing an alternative option to meet the non-potable water needs of the development. An extension of the scheme from Rosehill via the Parramatta CBD into Parramatta North and Westmead has the potential to reduce demands on, and costs of supplying potable water to non-essential services (e.g. cooling towers, toilet flushing).

Avoided infrastructure costs associated with the need to augment existing centralised utility infrastructure and from reduced plant in individual buildings, could be reinvested into alternative options, with the potential to provide substantially increased benefits to the development over the short, medium and long term.

Council would be pleased to assist UrbanGrowth NSW with further advice in relation to these matters.

3.11.2 Water Sensitive Urban Design (WSUD)

Council's Community Strategic Plan, *Parramatta 2038*, has identified a long term goal of bringing back swimming to the Parramatta River. The vision to bring back swimming has the potential to encompass many other aspirations for the Parramatta River, as it will require water quality (at least in designated sections of the River) to meet primary contact recreation standards for most of the year. This will also result in improved water quality for other forms of recreation and for aquatic flora and fauna.

The Parramatta North Precinct has the ability to significantly influence water quality within the River through well planned infrastructure that reduces pollutant loads. As a result, residents, workers and visitors to the precinct will reap substantial benefits, with quality views and access to a clean river for recreational purposes.

Adopting an integrated water management approach that considers all aspects of the water cycle including water supply/demand, stormwater management and wastewater treatment can provide significant environmental, economic and social benefits. These include:

- Potentially reduced upfront and ongoing costs associated with the development
- Greater diversity of supply (due to less reliance on potable water for non-essential uses)
- Improved waterway health outcomes through greater pollutant removal
- Improved urban amenity by utilising water within the public domain
- Reduced risk of localised flooding

Council would consider this approach preferable for a development of this size in order to deliver efficiency outcomes and minimise the impact of the site on local waterways and infrastructure.

3.12 Flooding

The following comments are provided following a review of the Infrastructure and Flooding Study prepared by Hyder Consulting.

3.12.1 Existing Flooding Affection

- The Parramatta North Urban Renewal precinct is in parts affected by mainstream, major and localised flooding.
- This area is covered under the Upper Parramatta River Flood Study, Draft 8 model and the Upper Parramatta River Catchment Floodplain Risk Management Study by Bewsher Consulting, dated 2003.

3.12.2 Stormwater Management and Localised Flooding

- It is agreed that Council's current requirements in relation to On-Site Stormwater Detention and Water Sensitive Urban Design (WSUD) be maintained for this precinct area. On-Site Stormwater Detention and WSUD to control increased runoff and water quality from new developments should not be permitted on public open spaces.
- New roads and new public spaces may trigger opportunities to improve water quality by use of WSUD treatment measures. This should be investigated as part of any detailed design.
- A requirement should be set in the DCP that the existing Council stormwater drainage system be upgraded or extended to increase the capacity to capture all flows generated in a 1 in 20 year design ARI storm event. In addition to this requirement provisions are to be made to enable safe overland flow paths for a 1 in 100 year design ARI storm event.
- It is agreed that further detailed local overland flow analysis investigation will be required to quantify overland flows and to design safe overland flow paths prior to rezoning of the precinct area.

3.12.3 Mainstream (Regional) and Major Flooding

- Additional flood protection should be offered to existing developments such as the Cumberland Hospital and other sensitive sites.
- Any proposed rezoning should appropriately consider flood impact with respect to Land Use Categories as outlined in Council's Local Floodplain Risk Management Policy.
- Open space should be strategically placed to allow for potential dual use as safe access for overland flows.

3.12.4 Planning Considerations

- Development should strongly adhere to Council's LEP, the Section 117 Direction 4.3 – Flood Prone Land and also with the State Government's Flood Policy and recommendations outlined in the NSW Floodplain Development Manual, dated April 2005.
- Consideration of a property's impact to flooding should be included in any proposed up-zoning for development.
- Flood maps of the CBD area showing flood inundation extents for the 1 in 20 year, 1 in 100 year and PMF together with the 1 in 100 year hydraulic flood hazard map should also be included for consideration when identifying potential properties for redevelopment as part of any strategic planning process.
- It is recommended that a Local Strategic Floodplain Risk Management Plan be prepared that responds to both planning and floodplain risk management needs. The plan can investigate the potential for improved flood mitigation options and improvements to overland flow paths.
- With increased development densification, particularly in those larger developments requiring direct connection to council's underground stormwater drainage system it may also be necessary to appropriately upgrade the existing stormwater drainage street pipe drainage network. Improved stormwater drainage inlet capacity to control surface runoff should also be required. The determination of additional improvements to the drainage network should be included as part of the hydraulic model analysis for events up to and including the 1 in 20 year ARI storm.
- A detailed Flood Study Report, Floodplain Risk Management Plan and Flood Emergency Response Plan need to be prepared.
- Sydney Water should be formally requested to provide comments with regards to any proposals that are considered adjacent to Sydney Water infrastructure.
- Details of Precinct Catchment focussed design measures will be required to be prepared during detailed design stage of this project to Council's satisfaction.
- The investigation of major innovative flood mitigation works such as a major flood detention basin upstream of Parramatta CBD to reduce the impact of mainstream flooding within the CBD area should be explored. An example of this would be Council's existing McCoy Park Detention system located near the boundary of Blacktown LGA. These flood mitigation works would need to be very large long term visionary works. Funding would likely cost many tens of millions of dollars and should only be recommended if significant flood reduction can be demonstrated.

3.12.5 Proposed Flood Modelling Consideration

- Detailed hydraulic flood modelling should be undertaken to determine the extent and depth of flooding in this area. The hydraulic modelling shall include identification of the high hydraulic flow areas and all key overland flow areas. This modelling shall be undertaken using two dimensional modelling such as TUFLOW and include a detailed comparison between pre and post development scenarios.
- Modelling work is to determine and provide flooding impact to flood emergency evacuation routes over the full flood duration up to the peak maximum flood, PMF. This information can be used to create appropriate and detailed flood response plans.
- Modelling scenarios are to include impacts to planning and development as a result of future climate change.

3.12.6 Development and Building Considerations for Better Flood Resilient Properties

- Flood considerations to building design are not just merely related to fixing the habitable floor level above the 1 in 100 year flood level with a 500 mm freeboard and to allow for loss of flood storage in design of the ground floor. Developments should also comply with the flood related planning and development controls outlined in Council's Local Floodplain Risk Management Policy and DCP requirements.
- The building footprints should be designed to minimise their impact on flooding and to minimise flood risk. Overland flow corridors should not be obstructed by buildings.
- All critical building service such as air-conditioning units, lifts, mechanical ventilation units, electrical and communications systems should be located above flooding levels.
- It is also recommended that the key overland flow corridors should have adequate design considerations applied. Detailed cross sections should be derived based on specific overland flow path needs that address issues such as:
 - Minimum unobstructed overland flow width required;
 - Street and property frontage activation requirement details;
 - Recommended design layouts to achieve minimum finished habitable floor levels.
- Building developments within the floodplain would rely on seeking refuge on site in major flood events. Evacuation may not provide a desirable response in all cases. During the building design process the most appropriate flood emergency response scenarios would need to be investigated and the building designed accordingly with appropriate evacuation provisions to high floor levels and adequate assembly areas provided.
- It is strongly recommended that all habitable floor levels for all developments (residential and commercial) be designed for the 1 in 100 year flood plus 500 mm freeboard.

Appropriately addressing flooding in the planning and implementation of any urban renewal strategy will dramatically reduce flood risk and economic losses suffered in a flood event and will allow for quicker flood recovery by the community.

3.13 Contamination

Council is required by *SEPP 55 – Remediation of Land* and the Parramatta City Council *Contaminated Land Policy* to consider contamination issues when rezoning land and before the development of land. Based on the information provided in the preliminary environmental site assessment undertaken by JBS&G for the North Parramatta Lands Cumberland Precinct, Council understands there is potential land contamination in the precinct as a legacy of past land uses. However, the contamination is limited in area and unlikely to prevent future development of the site.

As the proposed rezoning covers a large area and the extent of contamination is not known, it is Council's position that a stage 2 detailed site investigation must be undertaken prior to any redevelopment of the site to characterise and quantify the extent of contamination. Mechanisms should be included in the LEP and/or DCP to ensure further investigation and remediation occurs before development of the land (or permissible uses are located according to land suitability).

The stage 2 detailed site investigation must be undertaken in accordance with the National Environment Protection (Assessment of Site Contamination) Measure (Amendment 2013) and relevant NSW EPA Guidelines proportionate to the nature of the land use activity.

If the stage 2 detailed site investigation indicates that the site poses unacceptable risks to human health or the environment within the footprint of the precinct and off site, then a remedial action

plan must be prepared in accordance with SEPP 55—Remediation of Land. The remedial action plan must justify the category of remediation in accordance clause 9 of SEPP 55—Remediation of Land.

Referral to the NSW EPA is necessary to determine if any associated licence, consent or permit is required under relevant legislation to regulate the potential contamination on site.

Part 4 – Concluding Comments

The proposal for the Parramatta North Urban Renewal precinct will generate significant benefits for the Parramatta area, including the following:

- Significant heritage restoration in a revitalised heritage precinct.
- Significant improvements to the public domain, including improved access to the river front and new public open spaces.
- Expansion of the Parramatta CBD to the north, consistent with Council's *Draft Parramatta City Centre Planning Framework Review*.
- Significant economic benefits in terms of industry output, including during construction and ongoing output.
- Significant opportunities for tourism.

This submission has identified a number of outstanding matters that require further analysis, commitment to infrastructure and design resolution. Council is keen to work with representatives from UrbanGrowth NSW and the Department of Environment and Planning to resolve these matters and work towards the goal of achieving a high quality, connected, vibrant and activated precinct.



Figure 6 – Artist's Impression: The enhanced Female Factory public domain

15 December 2014

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E wgardiner@bigpond.com

Department of Planning & Environment
Submitted online

Dear Sir or Madam

Re: Parramatta North Urban Renewal State Significant site

As a resident of the Parramatta area, I wish to formally object to the exhibited plans for the Parramatta North Urban Renewal (PNUR) State Significant site.

In brief my objection is based on the following grounds:

1. The plans as exhibited are incomplete, in that they only deal with part of the PNUR area;
2. The plans as exhibited are inadequate, in that they do not give adequate consideration to likely social impacts and the accompanying need for additional community facilities and services; and
3. The plans as exhibited do not make proper provision for affordable rental housing, contrary to NSW Government policy.

In making this submission, I accept that the PNUR site is a suitable precinct for consideration as a priority urban renewal area, close to the CBD of Parramatta. Set out below are the details of my objections, as per the order above.

1. The plans as exhibited are incomplete

I contend that the plans as exhibited are incomplete, in that they only deal with part of the PNUR area. The exhibited plans are restricted to the Cumberland (Hospital) Precinct and the Sports and Leisure Precinct, without considering three adjoining precincts – namely, the Parramatta Park Precinct, the Old Kings School Precinct and the former Parramatta Gaol site.

In my view it would be far preferable to exhibit a draft concept plan for the entire PNUR area, and after community feedback has been obtained on that concept plan it would be appropriate to propose redevelopment of individual precincts in the order that suits the Government. To propose revised planning controls for two individual precincts, in the absence of an agreed concept plan, risks piecemeal planning which ignores the spill over effects from one precinct to the next.

2. The plans as exhibited are inadequate

I contend that the plans as exhibited are inadequate, in that they do not give adequate consideration to likely social impacts and the accompanying need for additional community facilities and services.

According to the Planning Report, it is envisaged that around 4,100 dwellings will be built in the Cumberland (Hospital) precinct. This is equivalent to an extra population of between 12,000 to 15,000, depending on average household size. This is equivalent to building a new population larger than the existing suburb of North Parramatta, which covers an area more than twice the size of the PNUR (377 hectares compared to 146 hectares).

In this regard it is concerning that the material on exhibition does not contain a formal Social Impact Assessment or a plan to address the community facilities and services that will be needed by a growing population. I submit that all renewal plans of this size must include a Social Impact Assessment. The exhibited material includes 12 specialist studies examining aboriginal heritage, built heritage, ecological assessment, ecological management plan, economic impact, European archaeology, infrastructure and flooding, landscape, landscape heritage, social significance, and traffic. All these are important but without a Social Impact Assessment as well and important aspect of planning has been overlooked.

My concerns are magnified by the following statements that appear in the Planning Report: “The PNUR area is covered by two Section 94A contribution plans administered by Parramatta City Council. It is proposed that future development be subject to Section 94A levies in accordance with the plans applying to the area and in force at the time....The ILP (indicative layout plan) does not include built facilities for broader community use, though opportunities may arise through the detailed development phases, particularly relating to options for the adaptive reuse of heritage buildings” (Planning Report p. 85).

I submit that this is not a satisfactory approach. At the very least there should be a community facilities study conducted and sites for future community facilities should be identified. As well there is no information given on non-s94 facilities that the growing community might need, such as those provided by various state agencies, including Education & Communities, FACS, and NSW Health.

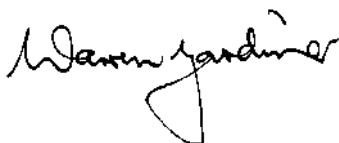
3. The plans as exhibited do not make proper provision for affordable rental housing

I contend that the plans as exhibited do not make proper provision for affordable rental housing, contrary to NSW Government policy. In *A Plan for Growing Sydney*, the NSW Government’s updated Metropolitan Strategy released recently, the Government says it will “provide affordable housing in Government-led urban renewal projects and on Government-owned sites” (*A Plan for Growing Sydney* p.77). In this regard it is clear that PNUR is both Government-led and on Government-owned sites.

Despite this, the exhibited plans explicitly rule out providing affordable housing in PNUR: “At this stage affordable housing is not proposed as part of the PNUR. The site is subject to heritage constraints that will require significant capital expenditure. Preserving heritage assets as an integral outcome of the renewal process is considered an appropriate compromise; adding affordable housing is an additional financial burden that the project cannot support” (Planning Report p. 36). This is not an acceptable trade-off, sacrificing affordable housing for investment in heritage.

It is indisputable that the Parramatta area already has a severe shortage of affordable rental housing, and one of the largest waiting lists for social housing in the state (as at June 2014 there were 2896 applicants on the waiting list in the Parramatta allocation zone GW1 and a further 1408 applicants on the waiting list in the adjoining Granville/Auburn allocation zone GW2). We cannot treat affordable housing as something to be addressed only after everything else has been provided for. It is an essential element of good urban renewal planning.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Warren Gardiner', with a stylized flourish at the end.

Warren Gardiner



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Ms Carolyn McNally
Secretary, Department of Planning & Environment
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Dear Madam,

North Parramatta Urban Renewal Plan

The built and natural heritage of the Parramatta district is of tremendous importance not only to the people of New South Wales, this is of prodigious significance to our nation and is recognised as having significance to evolution on the world's scale.

This letter is to register the collective concerns of our network of community groups spanning this state, with the **strongest possible objection** to the Urban Renewal Plan as presented, with our concerns as follows:

1. The proposal places undue development pressures on the landscape and heritage of an area that will be much needed for open space for the increasing Parramatta population in coming decades.
2. The area outlined in the Plan has been predominantly public land since early European settlement and its continued management and control should remain as an integrated precinct that is managed by a single government agency to ensure the long term survival, co-ordinated maintenance, conservation and presentation of this state and nationally significant cultural landscape.
3. That the declaration of the project as one of 'State Significance' removes the Heritage Council from the decision making process. If there was ever a situation where the Heritage Act and its operational authority were necessary to protect and preserve our national heritage, surely this is it. Only the proper involvement of the NSW Heritage Council in the decision-making process will produce a worthwhile development for the people of Parramatta, the State of New South Wales and the Australian Nation.
4. The scale and quantity of development proposed is contrary to the principles and guidelines provided in the Conservation Management Plans prepared for the NSW Heritage Council in conjunction with the State Heritage Register Listings.
5. That the excessive development indicated in the concept drawings will become even more intensive given the past history of the Parramatta City Council for increasing building heights following subsequent applications after the initial approvals.

6. Given the location, heights and density of buildings outlined in the proposal we vigorously oppose:
 - the construction of new multi-storey buildings in the Female Factory precinct;
 - the construction of 16 storey buildings directly adjoining the Recreation Hall, Chapel and Parramatta Gaol;
 - the construction of 4, 6 and 8 storey mixed use developments in Parramatta Park along O'Connell Street; and,
 - the demolition of the highly significant residence of the Chief Attendant, 9 Fleet Street.
7. That in addition to the points above it is essential that the Central Male Block which has a heritage value of "high significance" be retained.
8. That parking provisions are inadequately addressed in the proposal and before any rezoning is contemplated a detailed analysis undertaken so that the full implications this issue are placed into the public domain.
9. That the photomontages presented in the proposal appear to be very misleading and understate the impact on viewlines and values of the **World Heritage Listed** Old Government House and Domain.
10. That the proposal does not adequately address Aboriginal heritage, cultural and landscape perspectives and therefore further involvement of the Aboriginal community in decision making regarding this project be undertaken.

Whilst we support the principle of sensitive adaptive re-use of heritage buildings, so as to provide for their ongoing heritage conservation and presentation, the lack of the necessary controls and management of such measures is not adequately assured in this proposal and we cannot support its endorsement. The orientation of this Plan is clearly to seek immediate opportunities for economic gain with manifest disregard for heritage controls. It is important to acknowledge that our heritage also promotes economic growth; well-maintained, distinctive historic places attract businesses, investors and visitors and generate increased spend in the local economy.

NSW Heritage Network, in accord with a multitude of community and advocate groups across the State, reject the focus of this Plan's lucrative reward at the cost of our State, National and World Heritage. We call for development to avail upon best practice policy and guidance to steer the sustainable management of the historic environment, to support credible, consistent decision-making and to inform heritage-led regeneration across the sector.

Yours faithfully,

Leesha Payor, on behalf of *NSW Heritage Network Inc.*
19 December 2014

NSW Heritage Network Inc. acknowledges assistance in the preparation of this submission by numerous citizens and community advocate groups of the Parramatta LGA and the region of Western Sydney.

Date: 10 February 2015



PERICA & ASSOCIATES
URBAN PLANNING P/L

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Dear Mr File

North Parramatta Draft Planning Controls – Submission

I write on behalf of the Parramatta Leagues Club Ltd, who own the Leagues Club building within the proposed Sport and Leisure Precinct (but outside the planning controls) and has a long term lease of the carpark site, containing approximately 400 cars which services the Club and adjoining stadium. The latter car park site is within the area affected by the recently-exhibited draft planning controls.

Parramatta Leagues Club is a crucial component and asset for the Sport and Leisure Precinct of which it is part, and a clearly important stakeholder in the future plans for the area.

Summary of Submission

The submission for the Parramatta Leagues Club can be summarised as follows:

1. The Parramatta Leagues Club has been working and finalising a plan for the current at-grade carpark site for several years, in close consultation with the Parramatta Park Trust, Council and key stakeholders. This includes a staged proposal for approximately 1000 car spaces to service the Club, adjoining Stadium and precinct, together with a complementary leisure/club component which will significantly improve activation to O'Connell Street and interface with the Stadium. A DA is being finalised and is expected to be lodged in March 2015.
2. The proposal by the Parramatta Leagues Club will deliver a \$17 million upgrade (Stage 1) to the area at no cost to Government and with significant benefits for the surrounding precinct.
3. The proposed plans have been developed by HASSELL, who have been involved with plans for the adjoining Pirtek Stadium and surrounding area, and followed masterplanning which considered the site's relationship with the



PERICA & ASSOCIATES
URBAN PLANNING P/L

surrounding area, including linkages, appropriate activation, massing, view lines, future expansion and improved access.

4. There are many positive aspects to the proposed planning controls, including the overall objectives, the primary objectives for the Sport and Leisure Precinct and core proposed LEP controls. Some matters of detail remain a potential issue with the LEP, including the boundary of the zoning bisecting the existing carpark site, the road layout on the carpark site on the underlying control map(s) and a stated intention to limit retailing to 100sqm.
5. There are significant concerns with the proposed DCP and in particular the Indicative Layout Plan (ILP). The proposed DCP would have the effect of thwarting the proposed carpark and leisure proposed DA.
6. The two critical aspects of the DCP/ILP are the proposed north-south road bisecting the carpark site and the building envelope plans. The proposed road on the carpark site does not align with Fleet Street to the north (and is not likely to due to the intervening Northcott site) and therefore only plays a local access role, with other options available that may be preferable in the longer term. The proposed building envelopes are based on a typical residential floor plan. This is contrary to the stated intention for the area to be predominantly commercial/recreation/leisure uses.
7. The Parramatta Leagues Club shares Parramatta Council's concern with allowing residential uses in the Sport and Leisure Precinct due to inherent conflicts with the desired outcome and assets in the area. Other ancillary uses (such as a hotel) could readily be accommodated on the existing Club site or other nearby sites.
8. It is recommended and requested that the Indicative Layout Plan and detail for the Sports and Leisure Precinct be deleted from the DCP, at least as it applies to the Parramatta Eels carpark site. These details could be made "subject to further masterplanning", with or without the Framework Masterplan as it appears in Summary Report (Nov 2014).
9. The Parramatta Leagues Club would be interested and supportive of a collaborative more detailed and deliverable masterplanning exercise for the Sport and Leisure Precinct (which could also involve the privately owned Parramatta Leagues Club site).

The Club appreciates the efforts of both the State Government and Council to improve Parramatta and accommodate sustainable growth, and the time in hearing and understanding the aspirations of the Club. The objectives to improve the precinct and assets available to the community are shared between the Club and the Government. Careful masterplanning of the Precinct in a collaborative approach will help secure tangible, deliverable and timely positive outcomes for the area.

1 Background

The Parramatta Leagues Club has been developing a plan for the carpark site for several years. HASSELL were appointed due to their expertise, but also due to their involvement in planning and designing for adjoining sites, including Pirtek Stadium. Specifically, HASSELL were commissioned by Parramatta Park Trust to produce a Stadium Master plan in 2010. Further developments to this master plan were undertaken in 2013/2014 when Stage 1 of the stadium redevelopment commenced and DAs were prepared and approved for the Stadium expansion. The massing, form and design of the proposed leagues club responds to some of the fundamental strategies outlined in that master plan.

The proposed carpark development plans involved consultation with Parramatta Park Trust as owners of the site, Parramatta Stadium as a crucial neighbour and Council as both a regulator and adjoining land owner. The plans arose following design principles for the development of the Parramatta Leagues Club site to align with the overall Master planning strategy. An extract of the Concept masterplan developed by HASSELL is provided below, followed by the design principles for the Carpark design.

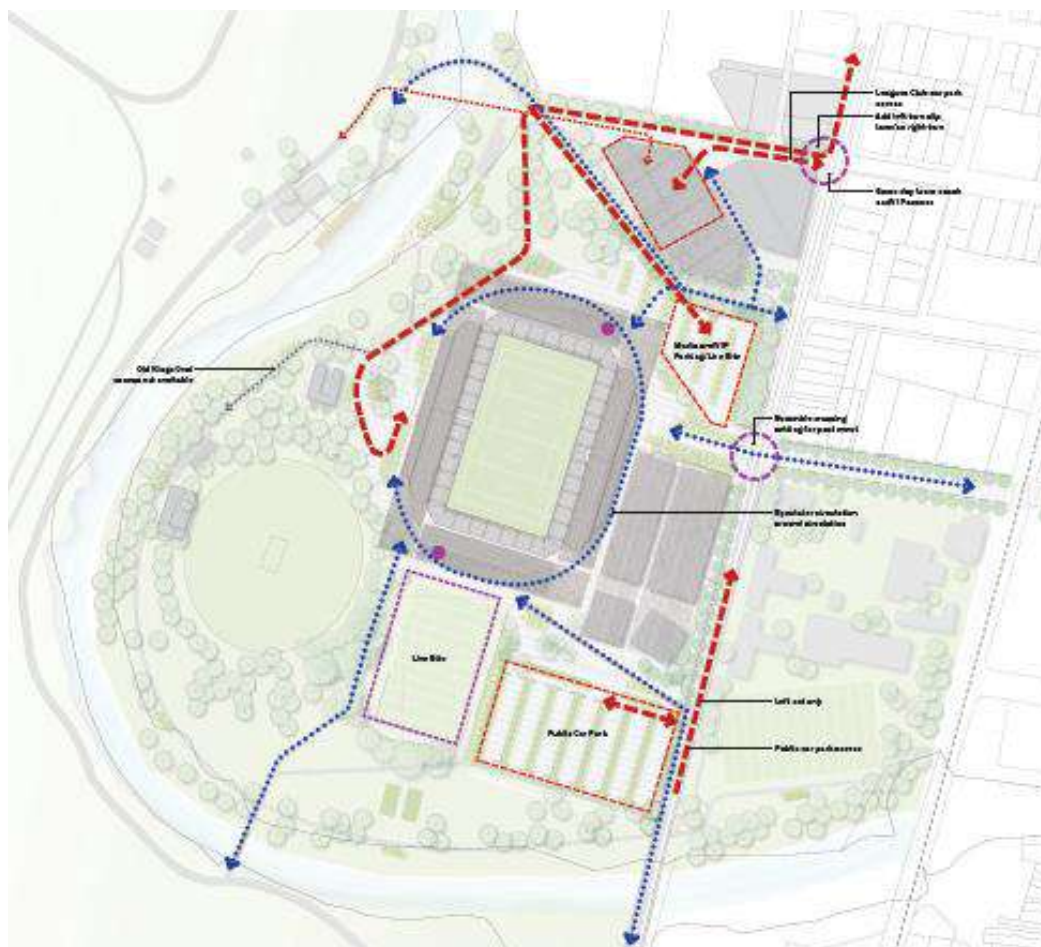


Figure 1 – Parramatta Park Concept Masterplan extract by HASSELL

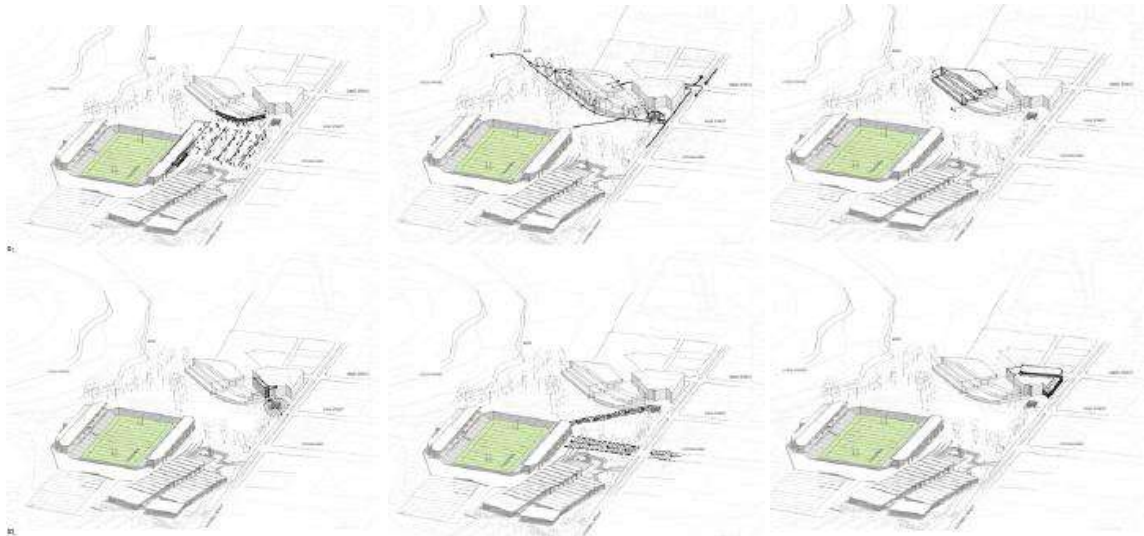


Figure 2 – Parramatta Leaguers Club Design Principles extract by HASSELL

A DA has been approved for Pirtek Stadium to increase its' capacity to almost 25,000 spectators (work has commenced), with longer term ambitions to increase the capacity to 32,000. The current carpark which adjoins the Parramatta Leaguers Club site (of 400 cars) is full on match days and there is clear need to increase its capacity. At the same time, there is a need to appropriately activate the interface with the public domain and O'Connell Street. A carpark with a smaller footprint over several levels (similar in height to the existing Club) has many benefits in this regard. It also would provide an asset for visitors to the wider precinct, given the many attractions in the area, including Parramatta Park, walking trails, pool/leisure centre and various heritage assets. The constraints of the area also make providing the carpark on the current carpark site most appropriate.

Plans have been prepared, endorsed by the Club Board, discussed with Parramatta Council and other stakeholders. Various supporting reports are underway, with the DA likely to be lodged in March-April 2015. This is an exciting development and will see around \$17 million (for Stage 1 only) of committed Club funds will provide a further asset for the area, at no cost to Government (and subject to development approval).

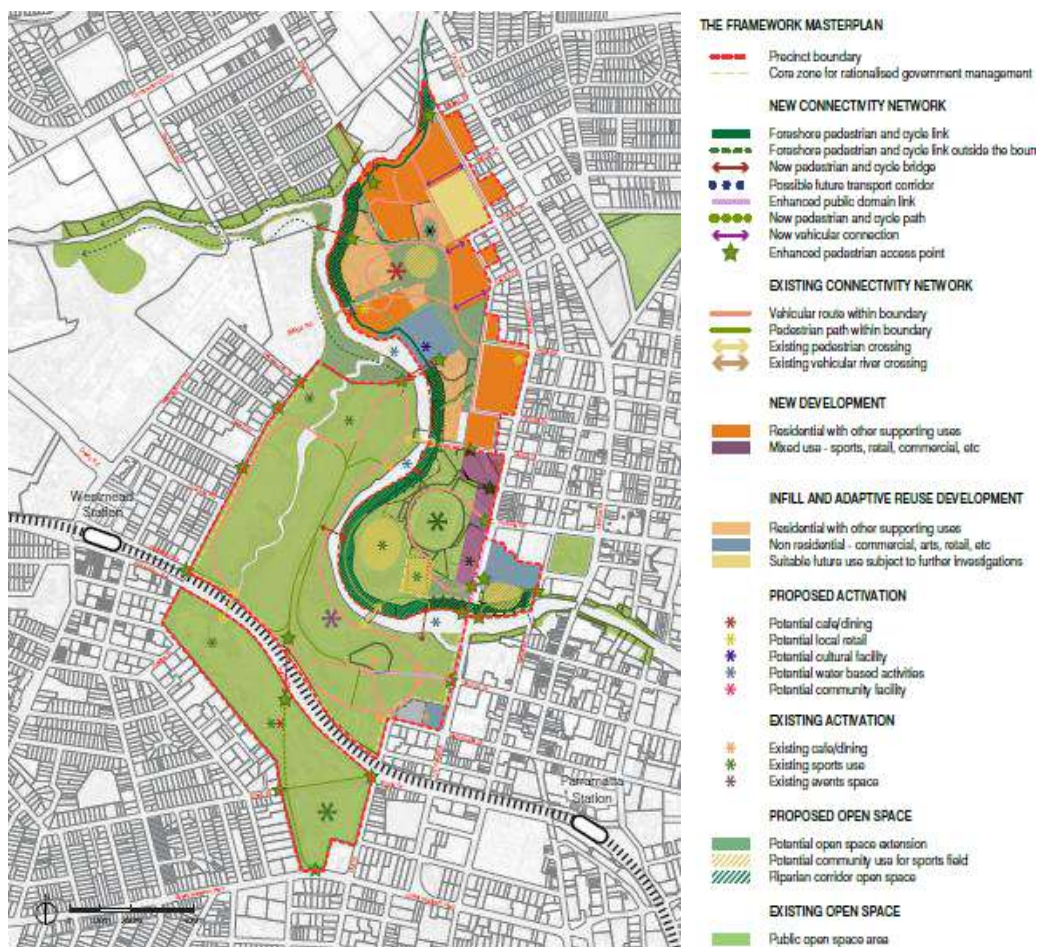
A staged DA will be lodged, including a component for active uses closest to O'Connell Street and opportunity to create a public plaza and meeting point off O'Connell Street and adjoining the main entrance, guided by wider considerations for the precinct and design principles appropriately addressing interface issues.

Given this, the Club is naturally interested to ensure the proposed planning controls would not thwart the Club's proposed plans. Unfortunately, aspects of the proposed planning controls do.

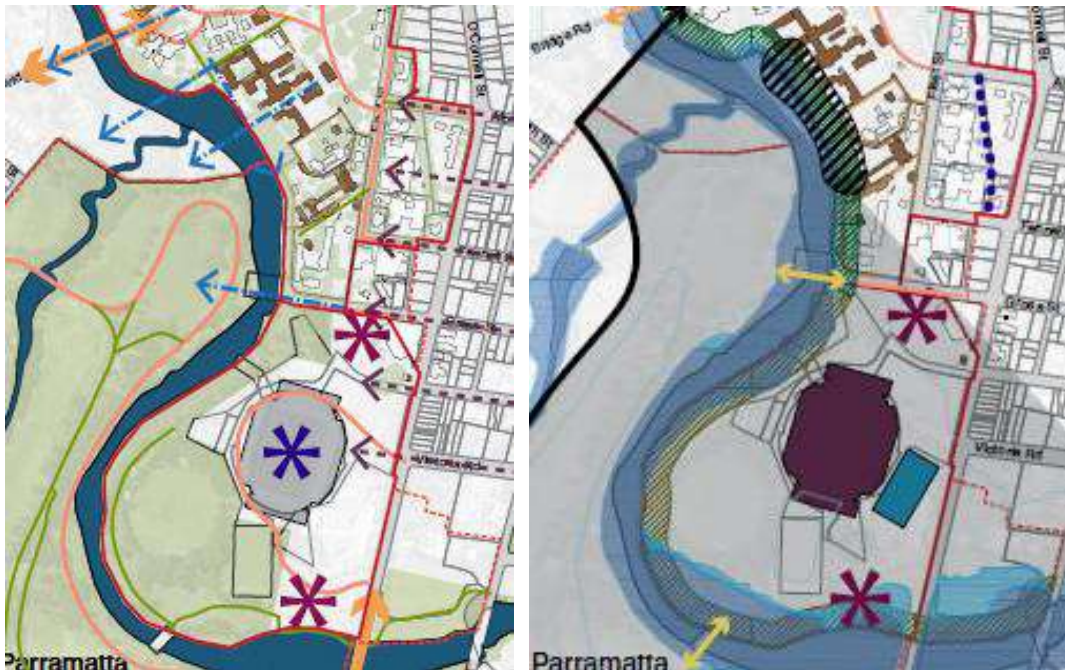
2 Aspects of the draft Controls Supported

The following aspects of the proposed planning controls are supported by the Parramatta Leagues Club:

- The underlying vision for the area, including encouraging/supporting jobs, investment, and mixed uses in wider area;
- Establishment of a Sport and Leisure Precinct;
- Statements supporting the primary uses within the Sport and Leisure Precinct being commercial, leisure and recreational uses;
- Amending existing LEP controls and not changing boundaries of the current LEP or applicable Contribution Plans;
- The proposed B4 zoning for the carpark site (or at least part of it), as it is the most flexible zoning;
- Requiring an Interpretation strategy for items of high or exceptional significance (such as the Gate House);
- The Framework Masterplan (as below) – which does not mandate site planning (such as a through road or building footprints), yet encourages an enhanced pedestrian access point south of the gatehouse, as provided in the November 2014 summary report:



- Retention of the large tree to the rear of the Gate House which provides important amenity and softening of the Club and surrounds;
- The analysis of the constraints and opportunities of the Sport and Leisure Precinct:



- No concern is held with the proposed FSR/GFA and height controls, as these do not compromise the Club proposal for the carpark site, on the understanding carparking will not be included in GFA and as the proposed height will not be higher than the existing Club. However, there is strong concern with the envelopes which gave rise to the GFA/Height controls and the boundaries of the controls and also the boundaries of the controls;
- Provisions related to design excellence and review by a Design Excellence Review Panel, as the Club is committed to excellence in design.

3 Aspects of the draft Controls Not Supported

As outlined in the introduction, the main concern rests with the proposed DCP, the Indicative Layout Plan (ILP) and provisions requiring development to be consistent with the ILP. Other concerns are also held with various aspects, as outlined below:

- a) The boundary of the proposed B4 zoning (and height/FSR controls);
- b) The Indicative Layout Plan road layout;
- c) Indicative Layout Plan Building Envelopes;
- d) The weight given to the Indicative Layout Plan for new development;
- e) The map “base” for the LEP controls indicating a non-existent road;
- f) References to limit retailing to 100sqm in size;

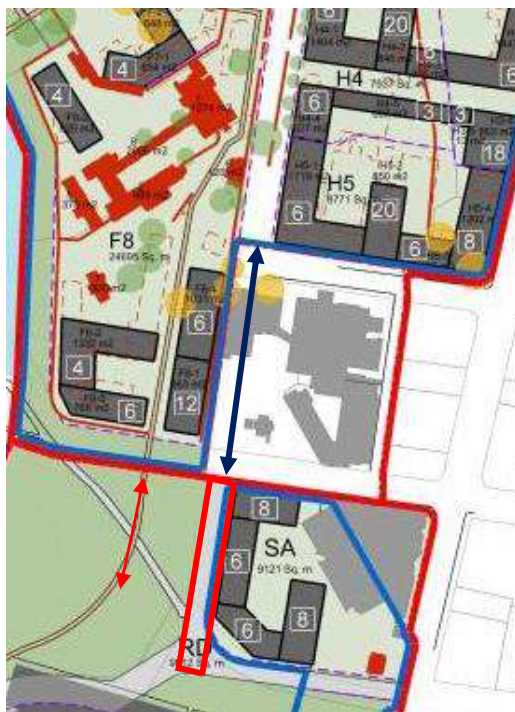
These are elaborated upon below.

(a) The boundary of the proposed B4 zoning (and height/FSR controls)



The proposed B4 zoning only covers part of the existing carpark site. A survey of the carpark site is attached. It is understood this largely arose from the potential archaeological remains of a former mill to the west of the B4 zoning. However, there is a lack of detail and certainty regarding any potential remains, which in any event should not preclude some development on the existing carpark site. Similarly, the boundary of the height and FSR controls, if retained, should be extended to align with the carpark site.

(b) The Indicative Layout Plan road layout



The proposed north-south road shown in the ILP (red box above) bisects the existing Parramatta Leagues Club carpark site. It is understood this arises from a desire to align and integrate streets with the existing street layout, in this case Fleet Street to

the north. A new road also provides some potential for a secondary linkage/road to Pirtek Stadium, which may reduce pedestrian/vehicle conflicts.

However, there are three main issues with this. Firstly, the road would bisect the carpark (existing and future), reducing parking availability and making its use impractical. Secondly, the road does not link with Fleet Street. This is because the privately owned Northcott site, with basement parking and substantial modern improvements and infrastructure, occupies the site. Therefore, the new road provides no wider or precinct role for traffic or even linkages. Rather, it is an additional local connection whose alignment with a road further to the north is of little consequence. Lastly, in terms of a longer term linkage with Pirtek Stadium and the Park, there would be a more sensible connection further to the west (red arrow above), which could also be integrated with a bicycle linkage, while allowing the carpark to remain and a more sensible road connection to the Pirtek stadium western carpark (as envisaged in a concept masterplan by HASSELL). The movement westwards would also practically assist with traffic management, by longer queuing and road distance to O'Connell Street.

(c) The Indicative Layout Plan Building Envelopes

It is apparent the ILP building envelopes are based on a traditional residential floorplate, due to their shape. However, this use is not the stated favoured use in the documentation supporting the new controls, which *is likely to be predominantly commercial and be a major venue for sports and community uses* (Summary report, Page 22 and 24). Residential uses are also likely to lead to land use conflicts and are not favoured by Council, as outlined in the Council resolution on 14 December 2014 regarding the draft plans.

The building envelopes also only utilise around half of the existing carpark site. This reflects and reinforces the north-south road, not supported for reasons outlined in the previous section.

The Parramatta Leagues Club has a lease on the carpark site until 2049. It has no desire and will not build the buildings shown in the Indicative Layout Plan. If adopted, the controls would thwart the proposed investment of \$17 million in favour of a proposal that would not happen for a very long time, if ever.

(d) The weight given to the Indicative Layout Plan (ILP) for new development

The proposed draft DCP says *“the ILP is the fundamental element to control the future built form within the PNUR”*. The intent is that the ILP be used to ensure new development follows the massing and details in the ILP. This is unfortunate as the plans have no regard for future growth plans and aspirations for the Parramatta Leagues Club, despite the Club being within the identified precinct and an important component of the area.

The intent to constrain future development is evident by the very prescriptive provisions relating to changes to the ILP in the DCP, stating (emphasis added) variations will only be considered which do not “**significantly alter the planning outcomes for the PNUR and where better outcomes can be demonstrated.** Amendments will usually only be considered where the change relates to an aspect of the Indicative Layout Plan that is **demonstrably unreasonable or unnecessary**, or where amendments are appropriate to address issues that will affect development generally in the PNUR. Identified setbacks to heritage items will generally not be accepted, however development lots **unconstrained by heritage considerations** will enjoy greater flexibility in the positioning of development on these tiles informed by detailed site consideration and demonstration that the underlying intent of the controls is achieved.

Assessing such variations would be very subjective. Experience shows that where planning controls provide certain and prescriptive provisions and uncertain or imprecise alternatives, the prescriptive provisions will be favoured by those implementing the planning controls through development assessment.

No issue is raised with the Framework Masterplan (within the Summary Report), nor the constraints and opportunities analysis. So, it is suggested the Indicative Layout Plan be deleted for the Sport and Leisure Precinct, or at least for the Parramatta Leagues Club Car park site. Either all the DCP provisions for the carpark site should be deleted, replaced with the Framework Masterplan and/or Constraints and Opportunities maps (or combination thereof). It is noted there is an intention to undertake a more detailed masterplanning exercise for the Sport and Leisure Precinct, which is appropriate given the multiple land owners, importance of the area to the success of the wider area, heritage/environmental considerations and need to align and coordinate longer term plans and ambitions of various components within the precinct. So, the controls in the DCP for the car park site/wider precinct could simply be “subject to further detailed masterplanning”.

The Parramatta Leagues Club would be interested and supportive of a collaborative more detailed and deliverable masterplanning exercise for the Sport and Leisure Precinct (which could also involve the privately owned Parramatta Leagues Club site).

(e) The map “base” for the LEP controls indicating a non-existent road;

The base map used to show the planning controls utilises a map showing the road proposed in the ILP. Given this road does not exist, it should not appear on the maps in the LEP. It is assumed this matter would be rectified by using conventional GIS mapping, consistent with the existing LEP maps.

(f) References to limiting retailing to 100sqm in size

There is reference to limiting retailing outside of Lot F3 (page 64 of the Planning Report accompanying the various documents publicly exhibited). However, it is not clear if this will be a control/standard, either through the DCP or LEP.

The intention of supporting a primary centre is understood. However, retailing which is complementary to the Sport and Leisure Precinct (such as restaurants, cafes, gyms etc) would not compete with a local centre and would be important in a successful precinct. Such uses are likely to be over 100sqm in area, either individually or cumulatively, as future development proposals are formulated.

Therefore, there should be no limit to 100sqm of retailing in the Sport and Leisure precinct, given the benefits of activation some complementary retailing could bring to the precinct.

4 Summary of Requested Changes to the Planning Controls

1. The boundary of the B4 zoning on the Parramatta Leagues Club carpark should align with the boundaries of the carpark site (as for any height or FSR controls);
2. Either all the DCP provisions for the carpark site (or whole Sport and Leisure Precinct) should be deleted, or replaced with the Framework Masterplan and/or Constraints and Opportunities maps (or combination thereof), with details to be subject to further masterplanning.
3. At the least, the Indicative Layout Plan for the Parramatta Leagues Club carpark site should be removed. If this is not favoured, the exemption provisions or instances for variation to the ILP should be much broader and based on overall objectives for the wider precinct.
4. The proposed north-south road within the existing Parramatta Leagues Club Carpark site, as shown on the ILP, should be removed from any LEP maps.
5. There should be no limit to 100sqm of retailing in the Sport and Leisure Precinct, given the benefits of activation some complementary retailing could bring to the precinct.
6. Provisions which favour commercial, leisure, community and Club uses on the carpark site over residential uses (as opposed to a hotel) should be considered. This could be by differential FSR or other mechanisms which favour complementary uses in the Sport and Leisure Precinct.
7. A statement in the DCP recognising the potential value of improved parking within the Sport and Leisure Precinct and/or current car park site would be beneficial.

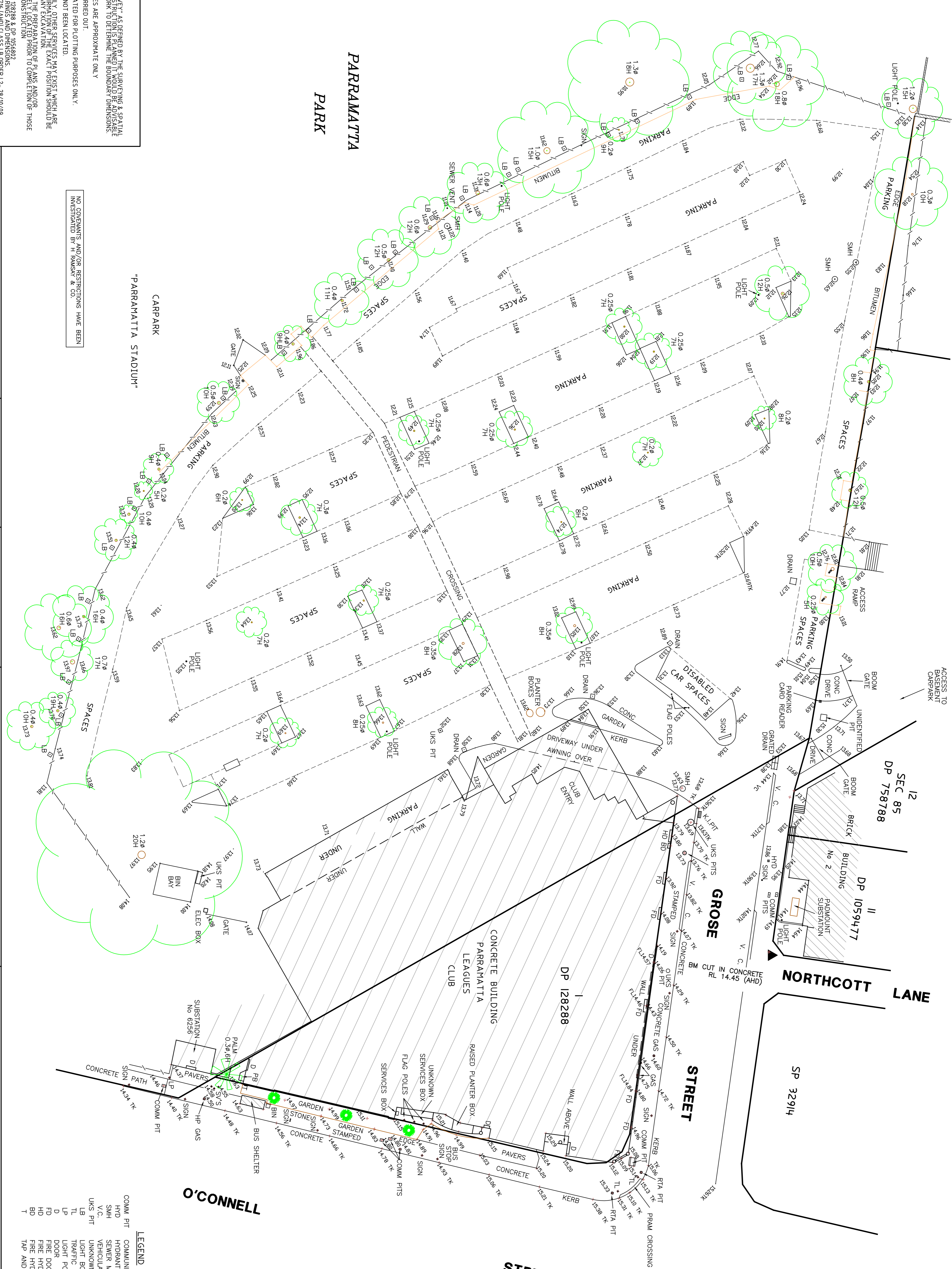
Submission – Draft Planning Controls – North Parramatta

The Club appreciates that this submission will be carefully considered in the deliberations regarding the draft controls for North Parramatta and looks forward to the outcome of such consideration. If you have any queries please contact me on 9389-4457 or 0448-413-558.

Yours sincerely



Jason Perica
Director



NOTES:
 THIS DETAIL SURVEY IS NOT A "SURVEY" AS DEFINED BY THE SURVEYING & SPATIAL INFORMATION ACT 2002. IF ANY CONSTRUCTION IS PLANNED IT WOULD BE ADVISABLE TO OBTAIN A SURVEY REPORT TO DETERMINE THE BOUNDARY DIMENSIONS, DIAMETER, HEIGHT & SPREAD OF TREES ARE APPROXIMATE ONLY.
 NO BOUNDARY SURVEY HAS BEEN CARRIED OUT.
 DETAIL ON THIS PLAN HAS BEEN LOCATED FOR PLOTTING PURPOSES ONLY.
 SERVICES ETC. UNLESS NOTED HAVE NOT BEEN LOCATED.
 SERVICES SHOWN ARE INDICATIVE ONLY. OTHER SERVICES MAY EXIST WHICH ARE NOT SHOWN. EXACT POSITIONS SHOULD BE DETERMINED BY A REGISTERED PROFESSIONAL SURVEYOR PRIOR TO CONSTRUCTION.
 ANY POINT OR FEATURE CRITICAL TO THE PREPARATION OF PLANS AND/OR CONSTRUCTION SHOULD BE ACCURATELY LOCATED PRIOR TO CONSTRUCTION.
 DIMENSIONS AND BEARINGS FROM DP 1056802 TO ADJACENT LOTS AND/OR STREETS ORIGIN OF LEVELS: SSM 18993, RL 55.716 (AHD) CLASS LB ORDER L2-28/10/09
 USE STATED DIMENSIONS, DO NOT SCALE.

DATE	DESCRIPTION
16-7-2012	ADDITIONAL DETAIL ADDED GROSE ST & O'CONNELL ST

AMENDMENTS	INSTRUCTED BY:
NO COVENANTS AND/OR RESTRICTIONS HAVE BEEN INVESTIGATED BY H RAMSAY & CO.	MR J CHIDIAC

L.G.A	LOCALITY:	RE:
PARRAMATTA	PARRAMATTA	PARARAMATTA LEAGUES CLUB LIMITED

H RAMSAY & CO.
 SURVEYORS EST. 1962
 H Ramsay & Company Pty Limited ACN 069 967 817
 CARLUNGHERO CENTRAL, SUITE 15, 241-245 PENNANT HILLS RD, CARLUNGHERO NSW 2118
 P.O. BOX 9082 HARRIS PARK NSW 2150 PH: (02) 9635 5840 FAX: (02) 9806 0027
 EMAIL: survey@hramsays.com.au www.hramsays.com.au

**PLAN SHOWING DETAIL AND LEVELS
 OVER PARRAMATTA LEAGUES CLUB CARPARK
 GROSE STREET, PARRAMATTA**

SCALE 1:300@A1
 DATE 9/8/11
 DRAWN GSN
 CHECKED GSN
 SHEET 1 OF 1 SHEETS

LEGEND

COMM PIT	COMMUNICATION PIT
HPD	HYDRANT
SMH	SEWER MANHOLE
V.C.	VEHICULAR CROSSING
LB	LIGHT BOX
UKS PIT	UNKNOWN SERVICE PIT
TL	TRAFFIC LIGHTS
LP	LIGHT POLE
FD	FIRE DOOR
FD	FIRE HYDRANT BOOSTER DOOR
BD	DOOR BOOSTER PUMP DOOR
TK	TRAP AND METER

M.G.A.
 DP 1056802

Emma Hitchens

From: Anna Johnston
Sent: Wednesday, 7 January 2015 2:49 PM
To: Emma Hitchens
Subject: FW: North Parramatta urban renewal

From: Judy Pettingell [<mailto:jjpettingell743@gmail.com>]
Sent: Tuesday, 6 January 2015 2:37 PM
To: Anna Johnston
Subject: North Parramatta urban renewal

Dear Ms Goward

I am a regular user of Parramatta Park. As it stands it is a wonderful public resource unique to western Sydney. On top of that it is of great historical significance for New South Wales and the whole of Australia.

The nation should be alarmed at the proposal to remove some of this historic treasure from public access as is described in the new plan.

Urgent action is needed to protect a world heritage site. It should remain in public hands so that all can enjoy this amenity.

Yours sincerely

Dr Judy Pettingell

58 Mitchell St
Naremburn NSW 2065

Re: Parramatta North Urban Renewal Submission

Thank you for the opportunity to make a submission regarding Parramatta North Urban Renewal and rezoning application.

I have reviewed the pamphlets and material available online regarding this application and find that there is not sufficient detail available to make an informed comment on many aspects of the proposal. For example, the pamphlet states that the project seeks to renew an area of NSW Government owned land in Parramatta North, transforming it into a vibrant area that respects and preserves some of our most important heritage, whilst providing housing and employment opportunities for Parramatta and Greater Sydney. The information currently available does not explain where these new jobs will be, which of the heritage buildings will be restored, or how connections between Parramatta CBD and Westmead will be improved with this development.

While I understand that this land is extremely valuable from a monetary point of view for the Government, it is also the second oldest European settlement in Australia and we need to be careful not to exploit and destroy our heritage. If Parramatta is really going to rival the Sydney CBD as a significant and viable tourist destination and educational point, we need to show that we treasure our heritage and provide large areas of parkland for all Australians to visit and enjoy. Accordingly, my main areas of concern are as follows:

Place of Historical Significance

This site is significant to the Aboriginal people having inhabited the region for 25,000 years or more before European settlement. While little is known of that time, documentation exists regarding the discovery, settlement and early days of living in Parramatta. The site has the potential to provide further archaeological evidence of life in the early colony as evidenced by the current archaeological work with the observatory in Parramatta Park and the finding of the footings of the old bridge found while working on the Lennox Bridge.

The Cumberland Precinct has been connected with institutions for the welfare and care of vulnerable people since the early 1800s. The Parramatta North Urban Renewal Pamphlet does not state which of the buildings are planned for restoration or demolition but according to the artist's drawing of the site, the buildings that are used now for the care of individuals with mental illness will be demolished and the residents moved off site. It is a shame that a place built for

asylum, may now be sold off to developers, and the people with mental illness may be cared for in multistorey buildings where there is no fresh air or walks in the gardens to assist with their recovery. Some of these buildings are invaluable to our heritage. I would think that the Female Factory and the building that is currently in use as the Institute of Psychiatry (Ward 1), and the Goal are all worthy of heritage listing. The financial cost of maintaining such buildings should be shared between State and Federal Governments. With such collaboration the buildings could be maintained and saved for future generations of all Australians to enjoy.

Overdevelopment

From the information available, it seems to me that the site will be overdeveloped. The pamphlet states that 4,100 new homes will be included. The artist's impression of the proposal shows some very tall buildings that are out of character with the surrounds.

The artist's drawing shows that Ward 1 in Cumberland precinct, itself an impressive two storey building, will be dwarfed by surrounding buildings. The apartment block on the corner of Albert and O'Connell Streets stands out from every other building in the vicinity due to the proposed size. I attended the Drop In session on 3rd December and asked a representative about the size and height of that particular building (since the banner stated "tall - 12+ storeys") and she was unable to answer my question stating that the buildings were not designed yet. Rumors around the suburb has the estimated height anywhere from 12 to 30 storeys high. Since there is an artist's impression of the structure, there seems to be some idea of what is proposed for this site already in the pipeline and the public are not yet privy to this information. Upon reading further some of the 20 attachments online relating to this site I found a diagram for the site on O'Connell Street between Albert and Fennell Street with a proposed building covering the entire double block including 4 tower blocks ranging from 18-30 storeys in height. I live in Harold Street and have a personal interest in the height of this building. A very tall building would deprive me of seeing sunsets through the trees, and have me experiencing shadowing for much of the day especially during winter. The four storey unit blocks opposite my house in Harold Street already blocks the winter morning sun and the four proposed towers in O'Connell Street would block much of the afternoon sun from my home. I would also experience loss of privacy due to many windows looking directly over my property. This proposed very tall building will be built in between the Cumberland precinct containing the Female Factory and other significant buildings and adjacent to the North Parramatta Conservation Area. The proposed 30 storey tower is directly opposite heritage listed homes on O'Connell Street. I bought into the conservation area a few years back and renovated our 100 + year old home in keeping with the guidelines provided by

Parramatta Council for such a home. At the time the Council was very particular about development near heritage items, suggesting that development should minimise any impact on the heritage property in terms of architectural style, scale, setbacks, external materials, finishes and colours. I would implore them to take a similar view with this proposed building that is so tall and out of place on the proposed site.

The high density housing also highlights other issues such as current facilities available eg; schools and parking problems. The proposal states that there are to be 4,100 new homes although the Traffic and Transport Review states that there are to be 5,600 new residential dwellings. Presumably there will be a number of children living in these new dwellings. It is unclear what extra facilities will be required but one would expect extra schools to be a necessity. The North Parramatta Public School already uses demountable buildings so it is puzzling that the proposal is planning to demolish what was a school to build residential towers.

Access to and from the new dwellings will impact on an already chaotic traffic and parking problem in the area. I read with interest the measures suggested in the Traffic and Transport Review to deal with this issue. Along with a couple of 'intersection upgrades' to local streets, it was suggested that 'limited parking ratios, bus improvements, cycle parking and car sharing' would generate significantly less traffic than other residential sites in the vicinity. I have no knowledge of where any of these strategies have worked in the past, nor why anyone would anticipate that they would work in this case. Parking on the local streets in the area is appalling. Since Council removed the parking meters in Harold Street, people park their cars on the street all day, sometimes for weeks at a time. Timed parking is not policed and school collection time sees parents double park, park in no parking areas in a very dangerous manner every day. The increase in the number of apartments locally is commensurate with the number of cars parked on the streets. The Parramatta North Urban Renewal and Rezoning Proposal shows no identified parking facility. The roadways are also not very visible in the artist's drawing but you can be assured that if this goes ahead, there will be lots of cars parked on the streets with or without limited parking ratios.

I have taken a long time to consider the Parramatta North Urban and Rezoning Proposal and write this submission. I have spoken to a number of concerned neighbours and find that many do not understand what the rezoning proposal really means, especially since a number of Development Applications have been proposed over the last few years. Most people do not have the time (especially in the run up to Christmas), or access to the internet to dredge through 20

attachments of a proposal that seems to be deliberately convoluted and complicated. For these reasons, I would like to request a public hearing so that the local residents can voice their concerns and hear from the people who are proposing such an enormous change to the area before it is too late.

Regards,


Jennifer Evans

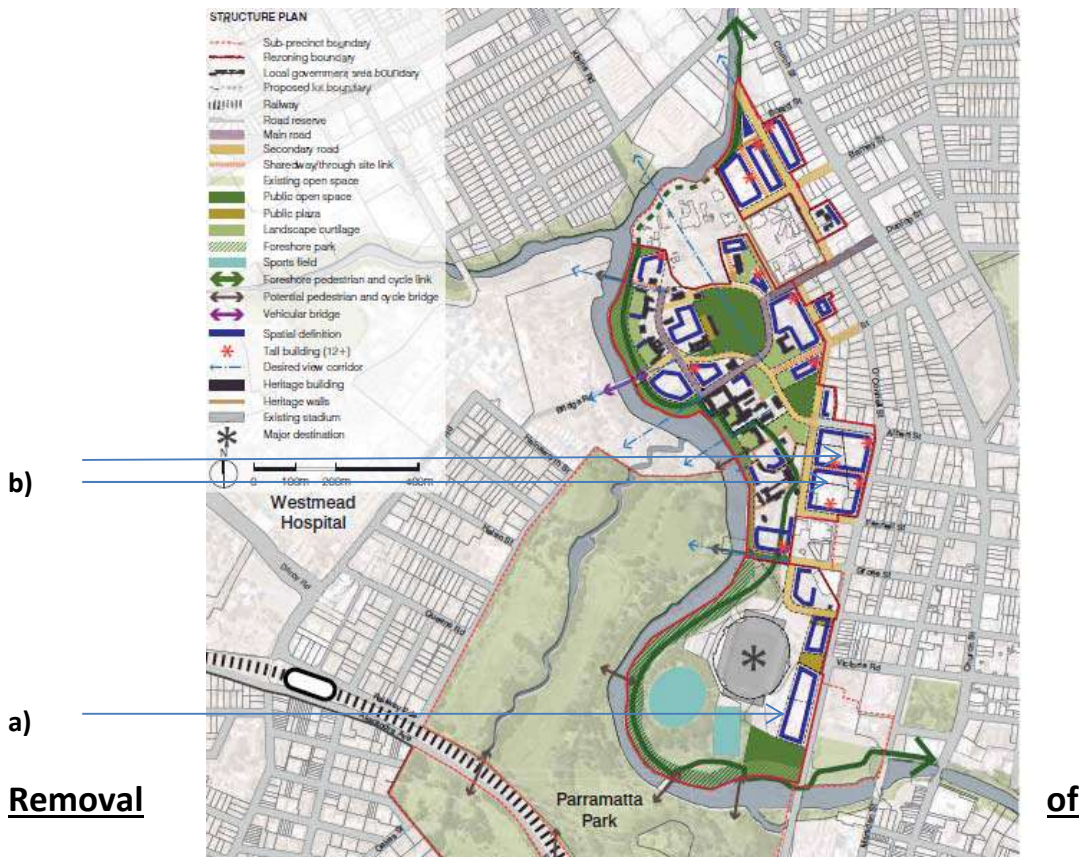
After viewing the exhibition at the Parramatta Town Hall on Saturday, 29 November 2014 I have the following questions I would like addressed by the Department of Planning and Infrastructure before there are any potential changes to the planning controls (rezoning) of the Cumberland Precinct & Sports and Leisure Precinct, as referred to in the Urban Growth NSW Parramatta North Urban Renewal proposal.

As a resident of North Parramatta I moved to the area after living in ‘tower’ style apartments for numerous years. My neighbourhood is an area of mixed use dwellings that still promotes the community and ‘village’ style living. High density apartments would obliterate this feeling. I believe there is still a village feel due to the number of residents; the types of dwellings (no more than three storey apartments in the radius of the Cumberland Precinct & Sports and Leisure Precinct) the types of business in the area; the schools and the sporting opportunities in the parklands, pool and playgrounds. The appeal of the ‘village’ along with the close proximity to North Parramatta Public School, Parramatta Public Pool, transport, child care and nursing homes are the main reasons I moved to the suburb.

There are three main points in the exhibition which are of high of concern:

- a) The removal of the Parramatta Public Pool;
- b) The development of high density (proposal suggestion of up to 30 storeys) apartments between Fennell and Albert Streets;
- c) The level of Infrastructure & amenities for the existing and proposed residents of the 4,100 new dwellings as per the PNUR proposal – roads, schools, waste, noise pollution

Image from PNUR New Planning Framework Summary Report November 2014.



Parramatta Pool

1. Who decided that the City of Parramatta did not need a public pool and based on what research? The City of Sydney has at least five public pools for the general public to access. As a '2nd City of Sydney' why would the pool be removed?
2. Has anyone investigated the current use of the pool? I could not locate this information in the extensive reports forming part of this proposal. As a regular user of the pool I would not like to see this integral part of Parramatta sports and leisure scene removed.
3. How was the title of *Sports and Leisure Precinct* given to this section of the proposal? The removal of the pool in this section would result in the only 'sport and leisure areas' being the existing stadium and the cricket greens. This appears to be a revenue building proposal in relation to the stadium which is not in the interest of sports and leisure.
4. If the current proposal is approved would there be a new public pool open for business prior to closure of the existing pool? Would this pool be within the postcode of 2150 Parramatta or 2151 North Parramatta? With the influx of residents in the area (refer to the current residential developments in Parramatta eg Aspire, Meriton and V by Crown) where would the residents go for swimming lessons, sporting triathlons, training sessions, water polo matches and general public pool use?
5. The government promotes that we are now living longer so a healthy lifestyle is essential, How would the removal of a sporting venue assist in this objective?

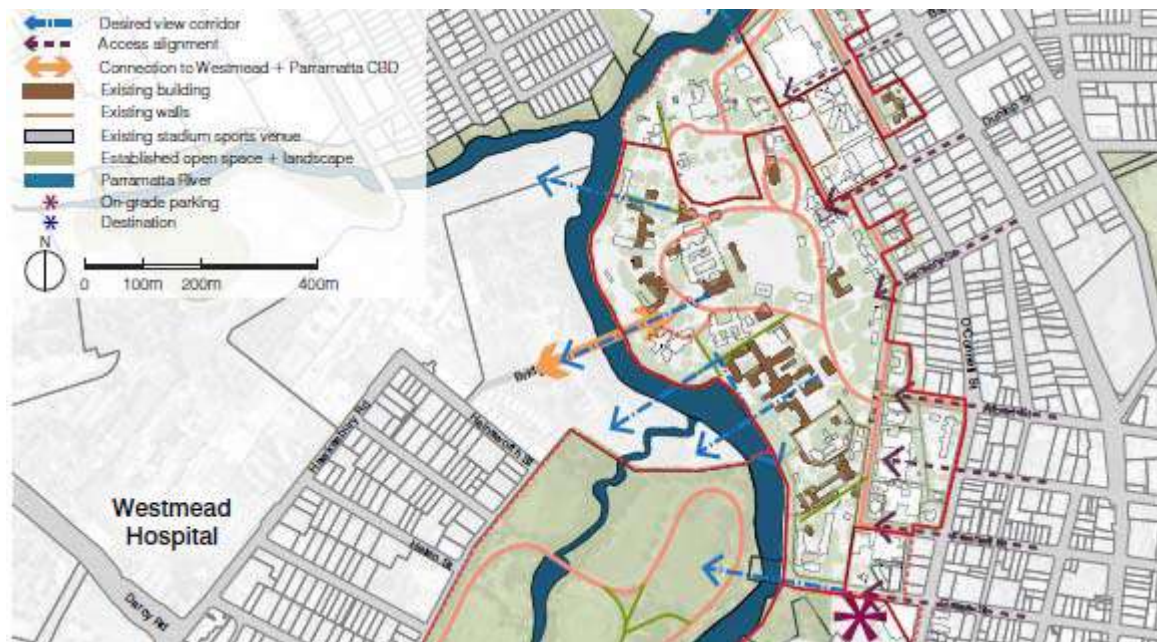
The development of high density (proposal suggestion of up to 30 storeys) apartments on O'Connell Street (between Fennell and Albert Streets).

1. How is the development of high density apartments in this area justified when the existing residences are single to three storey? The high density apartments in this plan appear to be a council revenue and investors initiative without consideration of the existing and future community. I estimate that Parramatta Council would reap at least \$4,000,000 extra a year in council rates from the new residential developments. The high density buildings would not be in character with the existing landscape and 'village' feel of the area, dwarfing existing residences.
2. Will the existing nursing homes and House of Hope be relocated within the North Parramatta area? One of the reasons I moved to this location was the close proximity to the nursing homes so I can be close by when my parents need palliative care. I would like to know if you have visited the nursing homes and House of Hope on the proposed development site to address this with the residences and employees. As you would be aware it would be virtually impossible for the occupants to visit the drop in sessions arranged by the Department of Planning & website information.
3. Where and what would the garbage disposal be for the proposed buildings? Recently I have noticed that more tower style buildings have an industrial waste type bin. From living in these style apartments I know that residents in high density buildings do not take care to leave the waste respectable resulting in stench and degradation of the building. Open air waste disposal would leave the neighbouring residences at an unwanted and unnecessary disadvantage as the stench of others garbage would seriously reduce our wellbeing.
4. Will each apartment in the proposed building have a designated car space on the building site? Will visitor parking be onsite? Albert Street is currently at full capacity with visitor and resident parking. O'Connell Street does not currently have space for off street parking and Fennell Street is always busy with visitors and residents too. I have read the PNUR Traffic

and Transport review which mentions an expected 9,000 (approximately) new vehicles in the area once all apartments in the Urban Growth NSW Parramatta North Urban Renewal proposal are complete. It is unrealistic to think that this amount of new vehicles will be offset by cycle ways and public buses as the report suggests.

5. Would Albert Street’s cul-de-sac be converted into a street which runs from Albert Street into the Cumberland Precinct? If yes, this would have a dramatic impact on the quiet and leafy existing cul-de-sac. Refer to map below taken from PNUR New Planning Framework Summary Report November 2014
6. Although the planning proposal indicates a mixed level residential development on the mentioned blocks from 6 to 30 storeys would there be any limitations set in place if the rezoning is approved? If rezoning is approved, what would stop a developer from changing the current proposal of mixed level apartments to high density 30 storey buildings covering the two blocks?
7. What does ‘residential with other supporting uses’ refer to on the proposal? Refer to map below taken from PNUR New Planning Framework Summary Report November 2014 indicating orange.
8. What would be done with the existing established trees on the site? The site currently has a high level of established trees which provide shelter & a food source to the native wildlife in the area. I have witnessed galahs, cockatoos, possums and blue tongue lizards on the site.

Image from PNUR New Planning Framework Summary Report November 2014



Infrastructure & amenities

1. How would the roads in North Parramatta be amended to deal with an approximate increase of around 9,000 cars after the development is complete? Currently O’Connell Street heading south and Church Street heading north east is grid locked in peak hour traffic. If the traffic is currently not being managed how would such a huge increase in residents be accommodated on the roads? (Please do not refer me to public transport and cycleway

options as it is evident that these are unrealistic and would not balance the congestion issues.)

2. Where would visitors find parking post development? Currently the parking opportunities are very limited in North Parramatta. How would an increase of visitor parking be accommodated in the construction of the residential developments? If I have interstate guests and family who require parking for more than one or two hours during their long stays what would be their options?
3. What public primary and high school options would the children of the 4,100 new dwellings have access to? North Parramatta Public School does not have the resources to deal with such a high influx of children. Has it been considered that the O'Connell Street (between Albert and Fennell) property be used to expand North Parramatta Public School? The location and landscape would provide a good opportunity for the children to move away from the existing demountable style classrooms and incorporate new teaching methods for the developing education needs of the next generation.
4. How would construction noise and debris be managed during the development stage of this project? Since this is a 15 – 20 year project I believe the existing residents of the area will not only experience emotional effects but physical effects such as the noise and debris side of construction. How will this be minimised during the 20 year timeline?
5. How would post development noise be managed due to the increase in cars, people, waste etc? Currently the area is a quiet leafy village style suburb which would be seriously altered for the worse with the increase in 4,100 dwellings.

Overall, I understand that there is land that could be used to enhance the existing use of North Parramatta however it appears that Urban Growth NSW has not included all stakeholders when developing the proposal. It appears that investors and council will reap the rewards post development however the existing residents will not. The existing residents will lose the close proximity to nursing homes, a public pool, a village style quiet suburb, quality of home life, street parking for visitors, trees and in turn wildlife. This is not a proposal for the community. Rezoning the proposal area for developments of more than four storeys is a mistake on behalf of the Department of Planning and & Infrastructure.

I look forward to your responses to my questions listed above at the earliest time.

Regards,

Kristie

Resident of North Parramatta

Website reference:

<http://www.urbangrowthnsw.com.au/work/urban-transformation-projects/parramatta-north-urban-renewal.aspx>

Image from PNUR New Planning Framework Summary Report November 2014



Dear Ms McNally

Interim Submission. I concur with the issues raised by
The National Trust of Australia (NSW) makes the following submission on UrbanGrowth
NSW's

proposed changes to the Parramatta Local Environmental Plan 2011 and Parramatta City
Centre Local

Environmental Plan 2007 – The Parramatta North Potential State Significant Site.

Firstly, and most importantly, the National Trust strongly opposes the declaration of the
Parramatta

North UrbanGrowth Study Area as a State Significant Site.

From a heritage viewpoint the North Parramatta Study Area has the highest level of Heritage
Significance.

- It directly borders the Old Government House and Domain World Heritage Area – dating
from
1788
- contains part of the Old Government House and Government Domain National Heritage
Register listed area dating from 1788
- two sites listed on the State Heritage Register, the Cumberland District Hospital Group–
dating
from 1803 (the Mill Phase), and the
- Norma Parker Correctional Centre dating from 1841 (both listed in April, 1999)
- borders the Parramatta Correctional Centre dating from 1842, (also listed in April, 1999),
- borders the Wistaria Gardens (now known as the Wisteria Gardens) listed on the National
Trust Register in 1993. Wistaria Gardens also contain the inscribed coping stones relocated
from Ward 6 of the Parramatta Psychiatric Centre and listed on the National Trust Register in
June, 1975.
- contains the Parramatta Female Factory Precinct National Heritage Register nominated area
which is also being proposed for addition to the World Heritage Australian Convict Sites
Listing.

The Australian public could expect that this State, National and International Heritage
Significance

would be the foundation for a State Significant Site declaration. However, the reality is that a
State

Significant Site declaration is a mechanism, initiated through a State Environmental Planning
Policy,

which is intended to nullify (switch-off) heritage and environmental protections enshrined in
State

Legislation.

The provisions in the NSW Heritage Act, 1977 allow for the NSW Heritage Council to
determine

development applications affecting State Heritage Register listed places (Integrated
Development) and

empower the Heritage Council to grant approval to an application, either unconditionally or
subject to

conditions, or to refuse approval.

This development determination power has been used wisely and effectively by the NSW
Heritage

Council for 35 years and has produced outstanding results such as the Westin Hotel (former Sydney GPO) re-development and the Sydney Capitol Theatre re-development. State Significant Development declaration is intended to fast-track development, switch off heritage protection and shift the balance away from heritage protection and enhancement to excessive and unsympathetic development. The public is largely unaware of this insidious effect of State Significant Development Status and consequently the National Trust Board has adopted a Policy of informing its members and the general public of the implications of this State Environmental Planning Policy. A copy of the policy is attached. The documents on public display clearly indicate that proper pre-development consultation with the NSW Heritage Council, on the basis that this development would be determined by the Heritage Council, would have produced a development much more sympathetic and understanding of the Study Area's outstanding significance and special qualities. The Trust will now detail its concerns regarding the publicly exhibited development proposal and its impacts on the heritage of the Study Area.

1. The Trust strongly supports the concept of sensitive and appropriate development, (primarily sensitive adaptive re-use), within the Study Area to provide for the ongoing conservation and presentation of the Area's historic buildings and landscape. However, the level of development is clearly predicated on a pre-determined property yield (4,000 residential units) which has no identifiable link to the funding required for permanent conservation of the heritage within the three State Heritage Register listed areas. The Trust estimates that a total maximum of 593,373 sq. metres of development is proposed within the Study Area. The target yield must respect the heritage that it is proposed to conserve.

There is an exceptional level of development proposed within the Study Area with two towers 30 stories in height, a 24 storey tower, three 20 storey towers, 16 and 14 storey towers, four 12 storey towers and 57 other residential buildings ranging up to 10 stories in height. The 24 storey residential towers in Walker Street, Rhodes give some indication of the height and scale of some of the towers proposed in the Study Area.

Viewing the artist's aerial oblique concept of the proposed development (page 7 of the Summary Report is an exercise in "spot the heritage building" where the massive towers totally dominate and dwarf the original historic buildings and their landscape.

The National Trust retains in its records the original artist's concept for the massive development surrounding Tempe House beside Wolli Creek Railway Station. The finalised development, years later, is much more massive and unsympathetic than the development illustrated in the original concept drawings.

Multiple applications of Section 75W of the planning legislation to vary and increase the heights of buildings beyond that originally proposed can be expected, as has recently occurred

frequently in Parramatta. The final appearance of this development can be expected to be far

worse than that indicated in the 'purple-tinged misdirection' of the drawing in the Summary Report.

In its October, 2014 Vision for North Parramatta, the National Trust urged that development be concentrated on the eastern and northern parts of the Study Area beyond and outside of the State Heritage Register Listed Areas. 43.7% of the development is proposed within this area and the Trust acknowledges this effort by UrbanGrowth to site development beyond the heritage-listed areas.

However, the National Trust questions the limiting of the Study Area to not include areas further east where 1960s 3-storey residential and single-storey light industrial/commercial could be redeveloped. This would have taken development pressures off the heritage areas in which much needed open space should be conserved intact for the benefit of the increasing Parramatta population in coming decades.

3. The National Trust strongly opposes the development of three new buildings (a six-storey, four-storey and three-storey building) within the 1803 Female Factory Precinct.

The TKD Architects Built Heritage Assessment states (page 50) that "new development within

the Female Factory/Asylum Sub-precinct (Precinct 01) should be limited to the appropriate adaptive re-use of existing buildings – the opportunity for new structure within this area is limited.

Yet, despite this clear advice, three new multi-storey buildings are proposed in the precinct, the largest (six storeys) being on the site of archaeology relating to the 1838-1839 Gipps Female Cell Block and near the likely archaeological remains of the 1818 diversion of the first

Mill Race for the Government Mill.

The development of new buildings within the Female Factory Precinct is unjustified. The description of such a proposal as "sensitive infill development at the Female Factory" (page 7 of the Summary Report) promotes a totally new and degraded meaning for the term "sensitive". This development proposal is "insensitive".

4. The artist's impression of the development proposal on page 7 of the Summary Report shows

only five vehicles on the site and the second artist's impression on page 23 of the Summary Report shows no motor vehicles at all. This is truly remarkable and unrealistic for a development where car parking for 4,000 apartments would likely equate to 3,000 cars or 100,000 square metres of car parking space. How this will be achieved is not addressed in the proposal, which simply states that car parking provision will be in accordance with the Parramatta Development Control Plan 2011.

Clause C.12 (4.3.3.5 On Site Parking) of this DCP requires that parking for residential flat buildings be accommodated underground, or otherwise integrated into the design of the building. The On-Site Parking Provisions in the DCP state that "above ground parking may be

appropriate for some sites, especially for sites constrained because of flood levels or archaeological conditions."

The documentation put out for public comment makes no reference to on-site parking provisions and likely constraints from archaeology and probable high water tables near the Parramatta River.

Construction of major underground car parking in situations where nationally significant archaeology occurs and where high water tables may be present would prove very costly and in some instances, the car parking may have to be integrated into the buildings' design.

In this event, it is unlikely that floor space yield will be correspondingly reduced to

accommodate integrated car parking. It is more likely that Section 75W applications will be lodged to increase the buildings' heights.

These considerations should be dealt with up front before any rezoning is contemplated so that the public is presented with the full implications of this development proposal.

5. The Central Male Block, indicated as CH 62 & CH64 in the TKD Architects Built Heritage Assessment is given a "Moderate Significance". However, in the 1998 Department of Public Works and Services Heritage Group North Parramatta Government Sites Conservation Management Plan the Central Male Block (Male Asylum) day rooms and verandah are given a

level of "High Significance". The Trust understands that the 2010 Perumal Murphy Alessi Conservation Management Plan also states that the Central Male Block is of "High Significance." The National Trust concurs with these "High Significance" assessments for the Central Male Block and strongly argues for its retention and sympathetic adaptation.

6. In response to the proposed quantity and scale of new development proposed within (and adjoining) the State Heritage Register Listed Areas, the National Trust refers to the Conservation Policies – Landscaped Setting section of the December 1998 North Parramatta Government Sites Conservation Management Plan prepared by the Department of Public Works and Services Heritage Group.

Policies

- Ensure that the setting of the North Parramatta Government Precinct is treated in a manner that recognises its significance as an item of environmental heritage.
- A substantial amount of the earlier site design survives at Cumberland Hospital, including vegetation and landscape setting. New work should consider the reinstatement of known missing elements and, where appropriate, sympathetic adaptive new design.
- The layout (evidence of spatial planning), integrity, plant diversity and maturity of the landscape constitute a major component of the setting of the place. These elements should be conserved.
- Within the North Parramatta Government Sites each of the separate institutions has a distinctive setting character, which is partly based on its layout. The integrity of the setting and layout of the North Parramatta Government Sites should be maintained.
- Any new development on the site should enhance and express the significance of the place. It should support and not obscure the significant elements and design principles of the formal layout.
- New access roads to the site should, ideally, make use of entrance points and relate to former road patterns which have a historical precedence, without compromising spaces of high significance.

The scale and quantity of development proposed is clearly contrary to the policies of the Conservation Management Plan, particularly those policies marked **bolded** by the Trust. The recommendations of the TKD Architects Built Heritage Assessment Report (page 50) regarding New Development are also being breached or ignored

- New development within the Isolation Precinct (Precinct 05) and the site of Mrs Betts' House (Precinct 03) may be appropriate provided that it is of a bulk, scale and character that would not impact the ability to understand the original site layout within this area and significant views to the Female Factory and Asylum from across the Parramatta River and from the bridge.

Within Precinct 05 the existing single-storey building is to be replaced by two six-storey

buildings and an eight-storey building, in direct contradiction to the Heritage Assessment Recommendation “new developments should be of a similar low scale that would not detract from the more significant structures of the former Female Factory/Asylum Precinct and Hospital for the Insane Precinct. An eight storey and two six storey buildings directly adjoining

the Parramatta River will also impact on the views along the Parramatta River which are now heavily treed with dense foliage evoking an image of how the river would have appeared to the first settlers and throughout the nineteenth century. Buildings do not presently impact on that view but new high-rise developments will change this character forever.

The Gothic Revival style Bethel House built in 1864 originally as an infirmary is sited within the

State Heritage Register listed Norma Parker Detention Centre. At present only its chimney is visible from the weir in Parramatta River. With the proposal for adjoining four and six storey buildings there should be an accurate artist’s impression to determine the impact on the present pristine views of the river foreshore vegetation from the weir.

Within Precinct 03 the present single-storey building is proposed to be replaced by a fourstorey

and a twelve storey building despite the recommendation that “buildings may be retained or demolished, new development in this area should have regard to the more significant buildings in the vicinity – in particular within the former Female Factory/Parramatta

Lunatic Asylum precinct and the Hospital for the Insane precinct.

Within Precinct 04 the TKD Architects Built Heritage Assessment recommends the retention and adaptation (if possible) of the Gardeners’ Cottage. The Assessment continues – “New development should ensure that the setting of the Recreation Hall and Chapel is maintained and conserved. The single-storey Gardener’s Cottage is proposed to be replaced by a 6-storey and a 16-storey building. Not only will the setting of the Recreation Hall and Chapel be severely impacted by the siting and height of these developments but this development directly adjoins, overshadows, dwarf’s and blocks the view from the main public oval area of the State Heritage Register listed Parramatta Correctional Centre which was the oldest gaol in original use in Australia and the most intact of the early (pre 1850) gaols in Australia.

The 6/16 storey building on this site is ill-conceived as it would be highly damaging to the setting of both the Recreation Hall and Chapel and Parramatta Gaol.

7. The National Trust is deeply concerned at the mistreatment of viewlines in the MUSEcape Parramatta North Urban Renewal Cultural Landscape Heritage Assessment. The problem relates to the Virtual Ideas / AJ + C photomontages which form the basis for the MUSEcape conclusion that the impact of the development on the Old Government House and Domain World Heritage values is acceptable. The National Trust has a particular and vital interest as the custodian of Old Government House.

The submission of possibly misleading images is a very serious matter. The government and the public must be confident that the material submitted is accurate.

The photomontages from page 75 and onwards of the Assessment are misleading. Some of the images have been composed to include the greatest number of trees in the mid-ground, effectively obscuring the outlines of the buildings in the background. For example, Figure 51

is taken from the top of a set of stairs. Stepping down just six steps would produce a completely different view with a ridgeline of towers.

In Figure 59 existing buildings can be seen clearly from the northern edge of the Park. However this image is taken so close to the river that they are all obscured.

Other images are taken from totally wrong locations. For example, Figure 47 is taken from

behind Old Government House instead of inside the tree line overlooking The Crescent.

Figure

48 is taken on the road behind Old Government House instead of on the ridge line at the middle of The Crescent.

In Figure 57 the view angle is approximately 160 degrees but the image shows only approx 90

degrees. The northern edges of this view would clearly take in taller developments. Figure 64 is a north-east view (not north) and Figure 65 is again a north-east view not north-west.

This constitutes false information leading erroneously to conclusions such as ‘there will be no visual impact’, ‘with no negative impact’ and ‘the visual impact on Old Government House &

Domain World Heritage values is considered acceptable.’

As all the information provided to MUSEcape for this part of the report came from AJ+C Architects (the planners contracted to UrbanGrowth) this assessment was not independent.

The number of sight lines looking into the Cumberland and Sports and Leisure Precincts are very limited indeed and consequently do not show any views with a high level of impact, with

the exception of Figures 68 and 72.

8. The significance of the State and National Heritage Listing lands within the Study Area is largely based on the long and unbroken line of government ownership virtually from the First Settlement of Europeans till the present day. This is evidenced by the Department of Public Works Heritage Group Conservation Management Plan being named the “North Parramatta Government Sites.” Like the sandstone buildings in Bridge Street, the State Listed Areas must

remain in State Government ownership and ultimate control, through long term leasing arrangements.

There must be integrated precinct management of the ‘whole’ by a single government agency.

Management of ‘fragmented’ parts of the site by new apartment dwellers’ body corporates, lessees of individual buildings or individual clusters of buildings would be highly detrimental to

the long term conservation of the Heritage Listed Precincts.

The hospital’s landscape scheme was established by the 1890s. The pathway system, garden areas and shrubberies throughout the hospital were established with orchards, vegetable gardens and vineyard on the periphery. Trees were supplied by the Botanic Gardens and plants listed as being supplied in the 1870s such as the *Schinus terebinthifolia* and Plane Trees

still survive on the site today.

The National Trust Register 1996 listing of the Cumberland Hospital Landscape sets out the reasons for listing on the Register. The Cumberland Hospital Landscape is of

- historic significance as a representative example of a landscape which exhibits evidence of the various phases of its development since the beginning of the 1800s.

The resultant landscape demonstrates the level of importance attached to a major public institution; changing horticultural fashions and attempts, with changing philosophies or care, to improve the environment for the patients.

- aesthetic significance as a representative example of an important site with landmark qualities from Parramatta. The quantity and diversity of its plantings enhance and define the local town and riverscape.

- social significance as a representative example of a landscape which is valued by the

hospital staff and local residents

- scientific significance as a representative example of a site with archaeological evidence of structures dating from the early 1800s. The diversity and intensity of its plant collection is significant in terms of horticultural botany and is an outstanding resource as a collection and of value for comparison with other institutions.

This magnificent landscape needs one custodian to ensure its long term survival and coordinated

maintenance, conservation and presentation.

9. 6-storey and 4-storey mixed-use development along O'Connell Street, south of the Victoria Road intersection has a massive footprint, totalling a maximum 57,914 sq metres of development, 10% of the total development in the Study Area. This development is within Parramatta Park, within the 1999 Parramatta Park and Old Government House State Heritage Register Listing, within the 1978 National Trust Register listed Parramatta Park Former Governor's Domain Landscape Conservation Area and also within the 'Highly Sensitive' area of

the World Heritage Site and would be visible from many parts of the World Heritage Area. A "mixed-use" development would surely not be an appropriate use within a 'Sport and Recreation' Precinct.

North of Victoria Street on O'Connell Street an 8-storey mixed use development is also proposed. This development is also massive being a total developable area of 31,192 sq metres representing 5.5% of the total Study Area development. This site is subject to the same important heritage constraints set out above.

10. Aboriginal community representatives have advised that the Study Area is of high significance

to the local and broader Aboriginal community. The Cumberland Precinct has the potential to contain contemporary historic values associated with the history of incarceration of Aboriginal

children and adults. Parramatta Park is exceptionally important to the local and broader Aboriginal community. The Park provides evidence of Aboriginal occupation providing tangible

links with the lifestyle and values of their ancestors and demonstrates the survival techniques utilised prior to European occupation. The Comber Consultants Aboriginal Archaeological & Cultural Heritage Assessment for the Cumberland East Precinct and the Sports and Leisure Precinct recommends that Parramatta Park is a significant cultural landscape which should remain as open space used for informal recreational activities and that the feeling of openness and seclusion which contributes to an understanding of the cultural landscape of Parramatta Park should be maintained. It is also recommended that high rise development adjacent to the Park that can be viewed from within the Park may have a negative impact on this appreciation of the precontact Aboriginal landscape. Appropriate and sensitive urban design principles should be developed which will mitigate this negative impact. View lines to and from Parramatta Park should be managed as detailed in the report by Planisphere (2012).

11. The Residence of the Chief Attendant (9 Fleet Street) was designed by the Government Architect's Office in 1910 and the cottage was completed in 1911. This building is proposed for demolition for the construction of new 10-storey and 4-storey buildings. However the Department of Public Works and Services Heritage Group 1998 Conservation Management Plan finds this building to have "High Significance". This building should not be demolished.

12. While Wistaria Gardens is not part of the Study Area, the National Trust takes this opportunity

to propose that the Garden's former glory be reinstated and that it become the focus for

horticultural events and particularly a major flower show along the lines of the Royal Horticultural Society's annual Chelsea Flower Show.

Conclusion

In summary the Trust –

- strongly opposes the use of a proposed State Significant Development Declaration to switch off the Heritage Act and remove the Heritage Council as a determining authority for a development which impacts severely on a number of State Heritage Register Listings.
- supports sensitive and appropriate development (primarily sensitive adaptive re-use) to provide for ongoing heritage conservation and presentation.
- believes that the excessive development indicated in the concept drawings will become even

more intensive given the past history in Parramatta of Section 75W applications to increase building heights.

- urges that the study area be extended eastward to take development pressures off the heritage areas and to preserve much needed open space for the increasing Parramatta population in coming decades.
- strongly opposes new multi-storey buildings in the Female Factory.
- urges that parking considerations be dealt with up-front before any rezoning is contemplated

so the public is presented with the full implications of the development proposal.

- urges the retention of the Central Male Block which is of “high significance”.
- urges that the development proposal have proper regard to the Conservation Management Plans prepared for the NSW Heritage Council in conjunction with the State Heritage Register Listings. The scale and quantity of development proposed in contrary to the policies of the Conservation Management Plans.

- opposes the construction of a 6/16 storey building directly adjoining the Recreation Hall, Chapel and Parramatta Gaol.

- is concerned that photomontages are misleading and understate the impact on viewlines and values of the World Heritage Listed Old Government House and Domain

- Urges a continuing integrated precinct management of the whole site by a single government

agency to ensure the long term survival, co-ordinated maintenance, conservation and presentation of this state and nationally significant cultural landscape.

- Opposes the 4, 6 and 8 storey mixed use developments in Parramatta Park along O'Connell Street.

- Seeks the close involvement of the Aboriginal Community in decision making regarding this project.

- Opposes the demolition of the highly significant residence of the Chief Attendant, 9 Fleet Street.

Proposes the use of Wistaria Gardens for a major annual horticultural event along the lines of England's Chelsea Flower Show.

The exhibited documents constantly seek to highlight the significant heritage in the Study Area but

then, perversely try to use that same significance as a justification for over-development.

Despite all

the references to heritage significance the documentation contains no proposals for accessing, interpreting and celebrating that heritage.

The major part of the development proposed is contrary to the Conservation Policies in the Conservation Management Plans prepared and submitted to the Heritage Council in respect of the State Heritage Register Listings.

National Trust Landscape Heritage Conservation Committee members returning from overseas visits to Europe's best heritage sites had noted the great care and sympathetic treatment of new development at those sites. However, by comparison, in New South Wales developer-driven proposals are illconceived and unsympathetic, rarely understanding and achieving the potential offered by such places as the North Parramatta Government Sites.

Only the unfettered operation of the Heritage Act and the proper involvement of the NSW Heritage Council in the decision-making process will produce a worthwhile development for the people of Parramatta, the State of New South Wales and the Australian Nation.

Cheers

Kerrie Poyner

Box 6213 Business Centre
BAULKHAM HILLS 2153

18/12/14

Ms Carolyn McNally

Secretary

Department of Planning & Environment

GPO Box 39

SYDNEY NSW 2001

Dear Carolyn

Re: North Parramatta Urban Renewal Plan.

Thank you for the opportunity to make the following submission regarding UrbanGrowth NSW's North Parramatta Urban Renewal Plan.

I have grave fears that the Plan as presented will have a devastating impact on what has to be the most significant heritage precinct in Australia. The reasons for my concerns are outlined below.

- The proposal places undue development pressures on the landscape and heritage of an area that will be much needed for open space for the increasing Parramatta population in coming decades.
- The area outlined in the Plan has been predominantly public land since early European settlement and its continued management and control should remain as an integrated precinct that is managed by a single government agency to ensure the long term survival, co-ordinated maintenance, conservation and presentation of this state and nationally significant cultural landscape.
- That the declaration of the project as one of State Significance removes the Heritage Council from the decision making process. If there was ever a situation where the Heritage Act and its operational authority were necessary to protect and preserve our national heritage, surely this is it. Only the proper involvement of the NSW Heritage Council in the decision-making process will produce a worthwhile development for the people of Parramatta, the State of New South Wales and the Australian Nation.
- The scale and quantity of development proposed is contrary to the principles and guidelines provided in the Conservation Management Plans prepared for the NSW Heritage Council in conjunction with the State Heritage Register Listings.
- That the excessive development indicated in the concept drawings will become even more intensive given the past history of the Parramatta City Council for increasing building heights following subsequent applications after the initial approvals.
- Given the location, heights and density of buildings outlined in the proposal I vigorously oppose:
 - the construction of new multi-storey buildings in the Female Factory precinct
 - the construction of 16 storey buildings directly adjoining the Recreation Hall, Chapel and Parramatta Gaol
 - the construction of 4, 6 and 8 storey mixed use developments in Parramatta Park along O'Connell Street
 - the demolition of the highly significant residence of the Chief Attendant, 9 Fleet Street.
- That in addition to the points above it is essential that the Central Male Block which has a heritage value of "high significance" be retained.
- That parking provisions are inadequately addressed in the proposal and before any rezoning is contemplated a detailed analysis undertaken so that the full implications this issue are placed into the public domain.
- That the photomontages presented in the proposal appear to be very misleading and understate the impact on viewlines and values of the World Heritage Listed Old Government House and Domain

- That the proposal does not adequately address Aboriginal heritage, cultural and landscape perspectives and therefore further involvement of the Aboriginal community in decision making regarding this project be undertaken.

In conclusion, whilst I support the principle of sensitive adaptive re-use of heritage buildings, so as to provide for their ongoing heritage conservation and presentation, the lack of the necessary controls and management of such measures is not adequately assured in this proposal and until such is provided I cannot support its endorsement.

Yours sincerely,

████████████████████

██

Ms Carolyn McNally
Secretary
Department of Planning & Environment
GPO Box 39
SYDNEY NSW 2001

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- The proposal places undue development pressures on the landscape and heritage of an area that will be much needed for open space for the increasing Parramatta population in coming decades.
- The area outlined in the Plan has been predominantly public land since early European settlement and its continued management and control should remain as an integrated precinct that is managed by a single government agency to ensure the long term survival, co-ordinated maintenance, conservation and presentation of this state and nationally significant cultural landscape.
- That the declaration of the project as one of State Significance removes the Heritage Council from the decision making process. If there was ever a situation where the Heritage Act and its operational authority were necessary to protect and preserve our national heritage, surely this is it. Only the proper involvement of the NSW Heritage Council in the decision-making process will produce a worthwhile development for the people of Parramatta, the State of New South Wales and the Australian Nation.
- The scale and quantity of development proposed is contrary to the principles and guidelines provided in the Conservation Management Plans prepared for the NSW Heritage Council in conjunction with the State Heritage Register Listings.
- That the excessive development indicated in the concept drawings will become even more intensive given the past history of the Parramatta City Council for increasing building heights following subsequent applications after the initial approvals.
- Given the location, heights and density of buildings outlined in the proposal I vigorously oppose:
 - the construction of new multi-storey buildings in the Female Factory precinct
 - the construction of 16 storey buildings directly adjoining the Recreation Hall, Chapel and Parramatta Gaol
 - the construction of 4, 6 and 8 storey mixed use developments in Parramatta Park along O'Connell Street
 - the demolition of the highly significant residence of the Chief Attendant, 9 Fleet Street.
- That in addition to the points above it is essential that the Central Male Block which has a heritage value of "high significance" be retained.
- That parking provisions are inadequately addressed in the proposal and before any rezoning is contemplated a detailed analysis undertaken so that the full implications this issue are placed into the public domain.
- That the photomontages presented in the proposal appear to be very misleading and understate the impact on viewlines and values of the World Heritage Listed Old Government House and Domain

- That the proposal does not adequately address Aboriginal heritage, cultural and landscape perspectives and therefore further involvement of the Aboriginal community in decision making regarding this project be undertaken.

In conclusion, whilst I support the principle of sensitive adaptive re-use of heritage buildings, so as to provide for their ongoing heritage conservation and presentation, the lack of the necessary controls and management of such measures is not adequately assured in this proposal and until such is provided I cannot support its endorsement.

Yours sincerely

A large black rectangular redaction box covering the signature area.

This is a summary of concerns – the attached document expands on the points. This submission relates only to the rezoning application and proposed changes to establish new land use zones, building heights and floor space ratios within the 'Cumberland' sub-precinct of the Parramatta North Urban Renewal Area.

1. Insufficient time for consultation and misleading information from the Department of Planning and Infrastructure (DOPI).
2. Perception of inappropriate association between developers and DOPI.
3. Consultation and planning has only been focused on the site.
 - a. Building high rise directly adjacent to a prescribed conservation area (LEP) and heritage listed properties is a reflection of that myopic view.
 - b. Lack of consideration of Parramatta City Council's changes to building heights in the LEP for the area to the east of the North Parramatta Conservation area (between Villiers and Church Street).
4. By change of zones in the north eastern corner of the site (Cumberland Precinct) to B4 Mixed Use and from indications on the proposal of 30, 2x20 and an 18 storey towers are incongruous with current and adjacent precincts.
5. This is not part of the CBD and high-rise on the location is totally inappropriate.

Expansion of Summary Points

1. In 2010 A DA No. 527/2010 was lodged by DEM (AUS) Pty Ltd to develop the site at Lot 1 DP 1143431 known as 9 Albert Street North Parramatta. The location is at the south western corner of Albert and O'Connell Street North Parramatta. The initial application was for 3 storey residential flat building complex containing 106 apartments. The development application was subject to approval by the Sydney West Joint Regional Planning Panel. Failure of the applicant and owners to provide the required information to address concerns of residents resulted in the JRPP declining the application and referring it to the Minister of Planning and Infrastructure. Specifically the letter over-rid the decision of the JRPP stating,

Following a thorough review by the Department of Planning and Infrastructure (the Department), under section 89A(1) of the EP&A Act, I request the Sydney West Joint Planning Panel to approve the staged DA (DA/527/2010), within 14 days of the date of this letter, subject to the conditions provided in the attachment to this letter.

This letter was dated 19th May 2014 and the DA was subsequently approved by Parramatta Council on the 8 July 2014 at which time the concerned residents were informed. For all intents and purpose the concern of residents were taken into account with some modifications made.

It is noted that there have been numerous consultations which I have attended most public ones. The charrettes were for invited stake-holders which appear to have been again site only focused. The original information and feedback sessions have been generic seeking feedback on what is valued rather than specific developments. Many of the concerned residents believe, at the time of writing, that the development for the site Lot 1 DP 1143431.

The summary report dated November 2014 was the first I knew of an application to vary building zones and in particular a proposal to build high rise towers as indicated on page 28 of the Summary Document.

Accordingly whether by design, mistake or incompetence Urban Growth was unaware of the DA approval for Lot 1 DP 1143431, although both have development proposals with origins or approval from the Department of Planning and Infrastructure.

The misleading notification of an approved DA and then an application to change building zones accompanied by a different proposal) in the matter of 4 months has not been understood or acknowledged by the residents of North Parramatta. Many of these residents do not have English as a first language. In the first instance they may have believed and rightly so that the development proposal was for a 2 and 3 storey development and not have engaged when PNUR published their November summary.

The size and complexity of the associated documentation for the PNUR proposal and it's accessibility make it difficult for residents to consider the impact of the proposal to vary building heights.

2. Addressing the assertion of a perception of inappropriate association between developers and DOPI. My understanding is that the applicant for the DA (DEM (AUS) Pty Ltd) has this option for five years. If this is the case then DOPI and in particular the Minister must have been aware of the PNUR development and proposal at the same time the letter was sent to the JRPP with the direction to approve the DA in February 2014. Has DEM (Aus) Pty Ltd been given an unassailable option by this letter. Is it referential treatment and what of tender processes. The other option is that the department has limited planning skills or project management communication which again does not instill confidence. How much money has been expended by DOPI pursuing a dead end created by DOPI.
3. The original DA was proposed as "affordable housing" and much was said by the Department of Housing and referred to by the Minister of DOPI in support of the DA. It is noted that in the PNUR proposal specifically states that the cost of the project does not allow for "affordable housing" in the PNUR proposal includes in their *Draft SEPP (PNUR) 2014 Report Framework* the following statement -
"....3.2.13 Parramatta Affordable Housing Policy2009
Council's Affordable Housing Policy broadly maintains the proportion of available affordable housing in Parramatta at eight per cent of the available housing stock and aims to expand the dwelling types and support investment in affordable housing. The policy establishes an advocacy framework for Council to lobby for and champion affordable housing in the local government area.
At this stage affordable housing is not proposed as part of the PNUR. The site is subject to heritage constraints that will require significant capital expenditure. Preserving heritage assets as an integral outcome of the renewal process is considered an appropriate compromise; adding affordable housing is an additional financial burden that the project cannot support.".

It leaves a perception that developer interests (profit) is a major factor. It is acknowledged that costs relating to heritage rectification and maintenance is perhaps another factor but this leads to my next point addressing what heritage is worth conserving.

4. Consultation and planning has only been focused on the site and has not considered the impact on surrounding precincts. It is noted that an emphasis has been placed on considering heritage value throughout the summary document. At page 18 of the summary document it states, "*provide zones away from existing heritage buildings for new high density development.*" Going on to say at page 7 "... *High density residential development opportunity between Fleet Street and O'Connell Street...*" and at page 28 "... *While the eastern edge of the PNUR area proposes heights of up to 30 storeys...*"

This is an admirable goal but the myopic view of the planners has failed to note that the tallest towers are proposed to be adjacent to an existing heritage conservation area being North Parramatta Conservation Precinct as outlined in the existing LEP. I would also mention that a check of heritage listed homes has three directly opposite with several others close by. Not to mention homes that currently are listed as significant (to be retained).

The other concerning aspect is that rezoning has already been undertaken by Parramatta Council to allow for high-rise development along Church Street (24 storeys) and Villiers Street (18 storeys). The approval I sourced from the DOPI web site. What emphasis is there on heritage when a conservation precinct two blocks wide is placed in the valley and shadow of high-rise developments. Again it is difficult to imagine that an urban planner could propose high-rise without consideration of adjacent and surrounding precincts. The argument of course is that a variation to B4 Mixed Use will not mean specifically high-rise – so why mention it in the proposal summary, with storey heights, if it is not proposed?

5. I have outlined several reasons in the previous paragraphs addressing the incongruity of high-rise development in the north-eastern corner of the Cumberland Precinct (Albert and O'Connell Streets). In support of the other issues addressed I would like to indicate that the site is not part of the CBD (as yet), has marked traffic and parking issues which will be addressed when DA's are submitted. There are also other issues relating to infrastructure include schools, child-care, jobs and public transport. None of which are in place nor demonstrated as planned to support the proposal.
6. This is not part of the CBD and high-rise in the Cumberland Precinct is totally inappropriate. It will overlook world heritage sites (Parramatta Park), impact on national, state and local heritage sites and areas. It is well documented that medium density is the preferred option if not decentralization rather than bigger cities. Parramatta Council has rezoned the corridor up Church Street, has touted massive development in the CBD and has targeted areas in Camelia, Rydalmere and Westmead for concerted expansion.

As is part of the Planning Process under community consultation I understand that I can ask for a public hearing. I believe that the Department of Planning and Infrastructure needs to address what can be perceived as misleading or deceptive processes. The direction of the Minister for DOPI to approve the DA which is then approved within 4 months of this new proposal needs to be clarified with residents who are under the misapprehension that the original DA is still in place, which it is. I have confirmed this assertion by speaking with residents in my block. All of them believed the proposal approved in July 2014 was the development planned for Lot 1 DP 1143431. After my wife and I conducted a letter box drop this week I have had 2 elderly residents and one other male knocking at my front door to see how they could voice their concerns. My wife and I found this distressing as those people who would or believed they would be adversely affected also had no knowledge of the proposal and the process.

Clarification is required as to how in a 4 month period an approved DA is not the proposal. I assert that it also requires explanation as to how this occurred and dispel any suggestion of collusion between the department and developers or/ explain how this was missed, resulting in unnecessary expenditure and staffing hours.

A public hearing is also requested to look at and allow submissions in respect to the impact on surrounding precincts. Discussion is also required in to what conditions can be applied to limit high-rise development.

Finally, I am not opposed to development. I just do not believe that high-rise development is the best option in the proposed precincts.

Personal reflection

My wife and I downsized to premises in Parramatta, renovated a commercial property that had heritage value and turned it into a home. Our efforts, respect for heritage values and considerable financial input received recognition from Council with a heritage award.

I love the fact that Parramatta is a city with a great history that is still visible. I understand that those heritage areas require maintenance but I do not understand why urban planners decide that high rise is the answer to finance it. If overseas visitors come to Sydney it's for the Harbour Bridge, Opera House and most importantly the beautiful harbour and safe environment. High-rise does not complement the City of Sydney, what makes any planner think that Parramatta needs it. It appears to be a quick financial fix.

Perhaps the Department of Planning and Infrastructure could be more innovative and dispel the negative perceptions, previous governments and ministers have invoked. Parramatta could be the hub for culture, sport and heritage in the west. By developing every available space (or in this case – selling it) you diminish the opportunity of a sustainable heritage (given time). We already have a high-rise city why can't Parramatta be different and focus and plan around the jewels we already have so it can be seated as a distinct and unique setting in the crown of Greater Sydney.



17th December 2014.

NSW Government - Planning & Environment Dept

Re: Parramatta North Urban Renewal Proposal

Dear Sir/Madam

I wish to formally put forward my submission for the Parramatta North Urban Renewal proposal, and state that I oppose the change of new land use zones and building heights which include the building of high rise residential units which you have put forward for general response.

But firstly I have to state that I totally agree that the Parramatta area needs to move forward with growth in many areas including housing and business to promote economic growth and the state owned lands do need to be utilised to their fullest.

But in saying that, I do not agree with the Parramatta North Urban Renewal proposal as it is being portrayed. Medium density housing (zone R3) is much more appropriate for this area.

My reasons for these thoughts are listed below:

1. High rise development should not be allowed in this heritage area. The development of the CBD, Auto Alley, Harris Park, Western Sydney University, Westmead, Camellia and Rydalmere all have high rise in their residential areas already and do not have the privilege of having Australia's first recorded history at its doorstep. Medium density, multi-use, 6-8 storeys, should be the highest allowed, to pay this area the respect it deserves.
2. There has been no respect, nor concern shown for the history, heritage and residents who live in the Conservation Area which is adjacent to the high-rise proposed on O'Connell Street. There are a total of 50 buildings individually named in the Local Environmental Plan 2011. 32 of which are State Heritage properties which contribute to the significance of the Parramatta Heritage and the other 18 have been recommended to be kept in their original conditions and no doubt will also become listed in due course. In the 2014 Report Framework document, Table 4 states that only 47 buildings will be retained of the 113 current buildings within the Cumberland Precinct which is less than the Conservation area holds en situ.
3. This North Parramatta Conservation Area is an area of early government subdivision that retains a considerable number of small dwellings and houses built from 1820 on to the early 20th century. The area contains 46% of the dwellings which existed here in 1895.
4. Having high-rise buildings Numbered H2, H3, H4, & H5 directly across the road just proves that you have NOT been adequately informed and the consultation provided by your 12 stakeholders do not understand the area, let alone know what is best for it. By my understanding of the LEP 2011, 5.10 Heritage Conservation, Special Precincts, this proposal will be very detrimental to this area and the heritage of the buildings within it. Heritage considerations need to be consistent with the character & streetscape of the area, not just within the Cumberland Precinct heritage buildings. I also understand that Church Street is planning to be developed with a range of high-rise buildings (sourced from the DOPI website). This will also contribute to putting the North Parramatta Conservation Area into shadows. I believe that the urban planner should not be proposing high-rise buildings between two (2) heritage areas quite close together.

5. The high-rise residential buildings proposed are an overdevelopment of the area and they will be out of scale with the surrounding homes. The buildings will be too high and the density of the buildings will not be sympathetic to the integration of the old and new.
6. All written content in the New Planning Framework document refers to the Heritage buildings within the Cumberland Precinct but not in the surrounding Heritage Conservation Area. Once again forgetting the fact that it exists and is important. This key constraint has not been considered at all.
7. The proposal of minimising car usage is very immature. Allocating one car-park per dwelling is primitive in this modern society – every household has at least 2 cars and depending upon the age of people and number of people living there it could be more. Where are they meant to park these additional vehicles? The local streets in Parramatta and North Parramatta are already congested and full by 7am every morning (including the pay zones). Apart from the fact that 2 more car parks in Parramatta city have/will be closed (one is downsizing over the next year).
8. The reports from Europe and America show quite clearly that high-rise communal living is detrimental to people, causing depression, ghettos and an increase in crime and pollution. In Sweden and Paris the ‘high-rise’ is being demolished and replaced by medium density housing.
9. In your own Framework report, 4.3 Height of Buildings, you state: “Heritage considerations have fundamentally guided and influenced the ILP, in particular the proposed positioning of taller buildings to minimise their impact on important buildings and views from areas of heritage significance, particularly Old Government House and Domain. This has resulted in graduated height controls. Taller buildings are generally provided to the east side of the Cumberland precinct to avoid conflict with important views and heritage places”. Well the Conservation Area is in the east side of the Cumberland Precinct and does include heritage places. Is this a total contradiction to what you have planned or just you being plain ignorant to other heritage areas.
10. Once again in your own Framework report, 2.4 Surrounding Areas, you state: “To the east of the Study Area, uses range between educational uses, residential accommodation ranging from single dwellings to three-storey residential flat buildings, interspersed with non-residential uses of former dwellings. Further east, retail and commercial uses are located along Church Street and Victoria Road”. Well again you are talking about the Conservation Area along O’Connell Street left out the fact that they are to be conserved which is again another contradiction to protecting and respecting heritage of the area.

Other points which I believe will be a problem eventually:-

1. Aboriginal Heritage in this area and along the Riverbank is very high and respected by the local residents and I am sure that the Darug Aboriginal people would not agree to you putting up high-rise buildings which might affect or harm the heritage buildings in any way.

2. I am concerned that there has been no provisions made for education, a school is being demolished to build a block of units. Where 4100 (& eventually 6000) homes are being built I would guess that around 2000 children are going to be living in the Precinct but where will they be educated? Both child-care facilities, primary and secondary schools in the whole of the Parramatta area are already at maximum capacity with a lot of schools having no room for more demountable classrooms and already have no grass for children to play on. **Question:** why isn't a school being included in all these plans, it could affect the purchasing decision of a family if there was a nice new school for their cherubs to attend. Why isn't the Department of Education being involved in the future of this area. Why not put both primary & secondary on the site in between both heritage areas instead of high rise buildings.
3. Traffic and congestion on O'Connell Street will definitely increase with another 4,100 homes (and a further 2000 at a later time), **Question:** while the space is there and vacant, are you going to widen the road before these new apartments are built?? Your own Traffic Impact Assessment states that an additional 280-600 Vehicles per Hour is expected in O'Connell Street alone. But there is no mention of the expansion of this nor other congested roads (ie Church St) in the area, all caused by this proposal.
4. I am quite concerned about the quality of our lives over the 17-20 year building period. That is a long time to listen to jack-hammers and be woken up in the middle of the night whilst heavy and large equipment (ie cranes) are delivered so as not to disrupt the flow of traffic during the day (this was the fact whilst the Church Street towers were being built).
5. The overshadowing of the Conservation Area is a definite if high-rise is built. The Shadow Impact statement only shows the shadow from the proposed new buildings, I believe that existing buildings shadows should also be shown, hence this report needs to be completed properly. Which by the way means that in my garden I will only get 1-1/2 hours of sun per day over the winter months. This is below the appropriate Benchmark for solar access.
6. Major damage to the local roads due to heavy and constant construction vehicles using the roads in the area.
7. The potential for a 7 days per week build. This plus long construction hours will definitely impact on every neighbour in the area.
8. The potential threat of air borne asbestos fibre and risk of dust disease once demolition of buildings commences.
9. Property values in the area will decrease if high-rise buildings are constructed. No-one wants to live across the road from a monster of a building. No-one will want to purchase my house and we cannot develop it because of the heritage of the building. Stuck in something we can't sell nor want to live in.
10. I will have no privacy in my own yard. I will always be 'watched' by someone in the high-rise.
11. The feral cat, cockroach and rat populations will increase due to communal style living and the additional rubbish produced.

12. Impact on the native wildlife in the area, Grey-headed flying fox & ibis are both protected and nest, breed and live in this area. Native birds, kookaburras, lorikeets, will all move on because people and concrete have taken over.
13. Pollution from vehicles, people, rubbish bins, and general living will increase.
14. Noise pollution will increase.
15. Crime will increase in the area with house break-ins, car thefts which in turn will cause more unnecessary strain on the local police and hospitals.
16. Small print making known things like Parra Pool will be relocated – more information needs to be provided upfront regarding a needed community recreational facility.
17. The new buildings on the corner of Church Street & Albert Street, after being completed and open for over 1 year, neither the units nor the retail shops below have been completely leased. (only 2 of 10 shop fronts have been leased as at today's date). – **Question:** how do you expect 4100+ homes to be filled and numerous shops leased. What incentives are there?

Whilst I am providing you with my personal information I would like my name and address kept confidential to other stakeholders and bodies who have access to this submission.

As part of a publicly exhibited proposal, I would also like to request a public hearing in regard to this proposal to address any misconceptions of misleading or deceptive proposals regarding the PNUR proposal.

Looking forward to your response

[REDACTED]

O'Connell Street, Parramatta NSW 2150

PO Box 1075, Dundas NSW 2117



15 December 2014
Ms Carolyn McNally
Secretary
Department of Planning & Environment 23-33 Bridge Street
SYDNEY NSW 2000

19 December 2015

Dear Ms McNally,

Parramatta North Potential State Significant Site - UrbanGrowth NSW proposed changes to the Parramatta Local Environmental Plan 2011 and Parramatta City Centre Local Environmental Plan 2007

I support the National Trust of Australia (NSW) submission on UrbanGrowth NSW's proposed changes to the Parramatta Local Environmental Plan 2011 and Parramatta City Centre Local Environmental Plan 2007 – The Parramatta North Potential State Significant Site.

Firstly, and most importantly, the National Trust strongly opposes the declaration of the Parramatta North UrbanGrowth Study Area as a State Significant Site.

I understand you have a full submission from the Trust, but in summary, the Trust –

strongly opposes the use of a proposed State Significant Development Declaration to switch off the Heritage Act and remove the Heritage Council as a determining authority for a development which impacts severely on a number of State Heritage Register Listings.

supports sensitive and appropriate development (primarily sensitive adaptive re-use) to provide for ongoing heritage conservation and presentation.

believes that the excessive development indicated in the concept drawings will become even more intensive given the past history in Parramatta of Section 75W applications to increase building heights.

urges that the study area be extended eastward to take development pressures off the heritage areas and to preserve much needed open space for the increasing Parramatta population in coming decades.

strongly opposes new multi-storey buildings in the Female Factory.

urges that parking considerations be dealt with up-front before any rezoning is contemplated so the public is presented with the full implications of the development proposal.

urges the retention of the Central Male Block which is of “high significance”.

urges that the development proposal have proper regard to the Conservation Management Plans prepared for the NSW Heritage Council in conjunction with the State Heritage Register Listings. The scale and quantity of development proposed in contrary to the policies of the Conservation Management Plans.

opposes the construction of a 6/16 storey building directly adjoining the Recreation Hall, Chapel and Parramatta Gaol.

is concerned that photomontages are misleading and understate the impact on viewlines and values of the World Heritage Listed Old Government House and Domain

Urges a continuing integrated precinct management of the whole site by a single government agency to ensure the long term survival, co-ordinated maintenance, conservation and presentation of this state and nationally significant cultural landscape.

Opposes the 4, 6 and 8 storey mixed use developments in Parramatta Park along O’Connell Street.

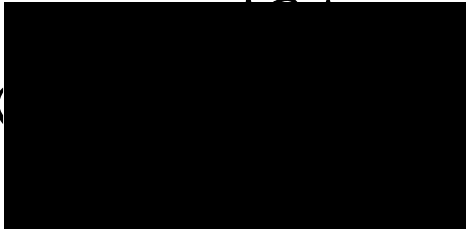
Seeks the close involvement of the Aboriginal Community in decision making regarding this project.

Opposes the demolition of the highly significant residence of the Chief Attendant, 9 Fleet Street.

Proposes the use of Wistaria Gardens for a major annual horticultural event along the lines of England's Chelsea Flower Show.

Please reconsider these decisions; I believe the Trust's recommendations provide the best way forward for this important site.

Sincerely,



Ms Carolyn McNally
Secretary
Department of Planning & Environment
GPO Box 39
SYDNEY NSW 2001

Dear Carolyn

Re: North Parramatta Urban Renewal Plan.

Thank you for the opportunity to make the following submission regarding UrbanGrowth NSW's North Parramatta Urban Renewal Plan.

I have grave fears that the Plan as presented will have a devastating impact on what has to be the most significant heritage precinct in Australia. The reasons for my concerns are outlined below.

- The proposal places undue development pressures on the landscape and heritage of an area that will be much needed for open space for the increasing Parramatta population in coming decades.
- The area outlined in the Plan has been predominantly public land since early European settlement and its continued management and control should remain as an integrated precinct that is managed by a single government agency to ensure the long term survival, co-ordinated maintenance, conservation and presentation of this state and nationally significant cultural landscape.
- That the declaration of the project as one of State Significance removes the Heritage Council from the decision making process. If there was ever a situation where the Heritage Act and its operational authority were necessary to protect and preserve our national heritage, surely this is it. Only the proper involvement of the NSW Heritage Council in the decision-making process will produce a worthwhile development for the people of Parramatta, the State of New South Wales and the Australian Nation.
- The scale and quantity of development proposed is contrary to the principles and guidelines provided in the Conservation Management Plans prepared for the NSW Heritage Council in conjunction with the State Heritage Register Listings.
- That the excessive development indicated in the concept drawings will become even more intensive given the past history of the Parramatta City Council for increasing building heights following subsequent applications after the initial approvals.
- Given the location, heights and density of buildings outlined in the proposal I vigorously oppose:
 - the construction of new multi-storey buildings in the Female Factory precinct
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 - the demolition of the highly significant residence of the Chief Attendant, 9 Fleet Street.
- That in addition to the points above it is essential that the Central Male Block which has a heritage value of "high significance" be retained.
- That parking provisions are inadequately addressed in the proposal and before any rezoning is contemplated a detailed analysis undertaken so that the full implications this issue are placed into the public domain.
- That the photomontages presented in the proposal appear to be very misleading and understate the impact on viewlines and values of the World Heritage Listed Old Government House and Domain
- That the proposal does not adequately address Aboriginal heritage, cultural and landscape perspectives and therefore further involvement of the Aboriginal community in decision making regarding this project be undertaken.

In conclusion, whilst I support the principle of sensitive adaptive re-use of heritage buildings, so as to provide for their ongoing heritage conservation and presentation, the lack of the necessary controls and management of such measures is not adequately assured in this proposal and until such is provided I cannot support its endorsement.

Yours sincerely

[REDACTED]
[REDACTED]

Winston Hills NSW 2153

Ms Carolyn McNally
Secretary
Department of Planning & Environment
GPO Box 39
SYDNEY NSW 2001

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Yours sincerely

[REDACTED]
[REDACTED]

Winston Hills NSW 2153

Emma Hitchens

From: [REDACTED]
Sent: Friday, 19 December 2014 4:59 PM
To: Parramatta North Project
Subject: Comments on Draft Plan

My name is Mr Chris GARDINER. [REDACTED]

[REDACTED] For privacy reasons i am requesting none of this information above with the exception of my name is published anywhere.

I attended the first information session at Parramatta Town Hall because i could not zoom in and read the detail online using Android or WM8 operating system devices. This has since been remedied.

A transport system is integral to the success of an urban plan. The width of roads determines on street parking, number of lanes, dedicated bus or tramways, cycle and pedestrian paths. These factors determine the choke points of and through puts for traffic. This then determines how many journeys of residents and visitors can reasonably occur in a set time frame.

Light rail has been mentioned for the Parramatta North Precinct. I was studying Transport and Logistics in Canterbury New Zealand from 1993-1995 when they decided to install a tram system in the Christchurch CBD. Major inconvenience was experienced by other road users as they dug up the roads to lay the tracks and built the overhead catenary wires to power it. When completed the rails in particular were hazards to bicycles, pedestrians and the disabled using walkers and wheelchairs.

If the kerb lanes are used for dedicated bus / tram ways on street parking is restricted. If inside lanes are used the pedestrians require frequent dedicated crossings to facilitate safe passage to en/detram. In Melbourne this requires vehicles to pull over to the left whilst waiting to turn right to not obstruct the trams traversing down the middle. From an Ergonomics perspective this driver action is unsound. I studied MODAPTS in 1988.

Wellington NZ has an electric Trolley Bus system. If the catenary wires are high enough they do not obstruct high vehicle loads. The busses themselves if fitted with a battery or small fuel motor can bypass accidents, breakdowns and road works in contrast to rail bound transport.

The Christchurch tramway did not survive the earthquake. Whilst they are not as frequent here the 25th anniversary of Newcastle is approaching where as the Acting Manager Demountable Operations for the NSW Department of Education i was intimately involved. Busses i know are more flexible post disaster than rail.

The proposed Maximum Building Heights range from 6 to 96 metres. At 3 metres a floor, from 2 to 32 stories. I contacted the NSW Fire Brigade and was directed to their website that shows aerial appliances capable of rescuing 400 kg from 27 to 37 metres at full extension. Given that the appliances in an emergency are unlikely to be able to abut buildings the actual heights achieved will be less.

400kg is about 3 people of my build rising to loads of 8 children or the elderly per lift. A slow process when many people need evacuating because a fire etc has blocked egress via the stairs below 27-37m. Aerial fire fighting appliances are high vehicles less tolerant of inclines, side slopes and overhanging hazards whilst transiting too and around an incident area.

A year or so after Newcastle i was again on duty in Parramatta when a storm approached from the South West. According too the BOM website 7,000 houses were damaged and 164,000 lost power. From our ~50m high vantage point we could see the greenish clouds approach. The opening crescendo was a vertical bolt of lightning which struck a Prospect Electricity substation and started a fire in the oil cooled transformers.

The over / under pressure from the winds caused the double glazed windows too flex. We retreated into the lift foyer in darkness where the building structure was thickest. The end stairwells appeared to be shaking so we ruled them out as an option until it passed. This is the problem residing in a lightweight constructed building in adverse atmospheric conditions.

c1986 when we first occupied this building in the Parramatta CBD the entire Air-conditioning Coolant tank ruptured on the service floor above us flowing down the lift and stair wells to ground level. As the Fire Party Leader I was aware that after the potable water and AC tanks were empty we were down to hand held appliances. Typically the potable water tanks refill midnight to dawn to maintain water pressure and deplete during the day as people bath, shower and toilet. By late in the evening there might be little potable water left to fight fires in high buildings.

Rescue via the roof was not an option for us given that the doors were padlocked to restrict access to the secure government communications equipment thereon. These would have entangled SWR winch cables from helicopters in lower wind states. Frequent helicopter movements at all hours transiting the adjacent Westmead Hospitals heliport does not appear to have been factored in to your plan for 4,100 - 6,000 new residences in North Parramatta.

In recent weeks flooding of under ground car parks in Fleet Street has occurred. I have been told the Hope Hostel lifts were inoperative due to the basement motor rooms flooding, requiring pumps and drying out before servicing prior to recommissioning.

An old military colleague who served in the SES told me their building not affected by your rezoning floods preventing access to their boats and vehicles. It needs to be relocated away from the gaol precinct for this reason.

Rezoning half the gaol seems silly. There is a dire shortage of Affordable Accommodation in this region of Sydney. I have stayed in the Old Swan Barracks in the Perth WA CBD. Parramatta Gaol would have 'bedrooms', showers, toilets, gymnasium, kitchen and dining rooms. You can clearly see there is a grassed area suitable for touch football and volleyball. Another yard has a basketball court.

The Linen Service building could be converted internally into apartments for the disabled etc who could not stay in the old gaol. The former staff parking area outside the Western wall should be retained for guests. I sighted two doors in the gaol wall that access it and the existing swimming pool in Cumberland Hospital grounds. The church South of which could be refurbished into some form of all weather entertainment or sporting complex.

A backpackers resort would require transport links to Parramatta Railway Station and Wharf. Bus parking near the gaol could be arranged in O'Connell Street. Parramatta Leagues Club should welcome their patronage.

When Parramatta League and Western Sydney Wanderers Soccer teams play at the Stadium their fans park for blocks in all directions. Cumberland Hospital charges for parking on their grounds on these occasions. The private parking adjacent the Club and Stadium is inadequate to cope with need now. 4,100 - 6,000 new residences in addition to remodelling the Cumberland Precinct into a business hub requires multi storey car parks therein to keep the streets clear for emergency vehicles and public transport.

Prior to the year 2000 Ryde Council Swimming Pools were downsized and privatised from 2 or 3 x 50m, 1 diving, 1 children's and 1 30m indoor heated pool to 1 1/2 indoor pools, squash and more tennis courts operated by John ALEXANDER who is now the member for Bennelong.

Rezoning Parramatta Council Pools for other than Sporting Purposes in a so named precinct is ludicrous. The adjacent car parking needs to go multi storey to facilitate the increased need for such in the whole Parramatta area.

Your plan to rejuvenate the Old Cumberland Hospital Precinct with all its historic buildings and open spaces has some merits. Retaining the oval as a centrepiece is commendable. As is a public pathway along the river. However the rezoning lines themselves and interrelationships are haphazard. You have drawn street extensions that do not exist. Nor have you provided any more river crossings particularly for vehicles which might be imperative in an emergency for access to 10,000 to 15,000 more residents.

I am aware there is already a Forensic Detention Wing of Cumberland Hospital East of the Parramatta River. The Childrens', Cumberland and Westmead Hospitals possible expansion is mostly constrained to vertically already. Cumberland patients also need to be accessible by family and friends not relocated in rural areas or onto the urban fringe. They also need open spaces to destress from the pressures of urban living.

The Methadone Clinic in Fleet Street needs to keep an interconnection with the Parramatta Drug Court and Hope Hostel for Short Term Accommodation. I noted the NIMBYish views of the Parramatta North unit dwellers in the Town Hall. I doubt they could be relocated West of the river.

The most alarming aspect of your rezoning is the area nominated to be 12+ stories North of Northcott and Parramatta Leagues Club. There are 3 Nursing / Retirement Homes in addition to Hope Hostel and the Methadone Clinic between Fleet and O'Connell Streets. The need for Nursing Homes and Retirement Villages will increase not abate on current aging populace demographic projections.

As a member of Epping RSL Club and its Sub Branch i am familiar with the dramatic affects of a rezoning on long term residents who thought they had tenure until passing. Two Nursing Home / Retirement Villages on the North East boundary of the Epping CBD gave their residents 1 and 2 months notice to vacate when rezoned to ~25 stories Q4 2014. Some were offered new placements in Sydney but wanted to retain relationships in the nearby community with family and friends.

If the rezoning of 12 to 32 stories proceeds herein somewhere else nearby needs to be rezoned for retirement living in a residential area beforehand. In so far as the new facilities and public transport are complete and ready to go when the existing residents need to vacate. Bryan WEST the Secretary of Parramatta RSL Sub Branch tells me our members have been forcibly relocated away from retirement living because of poor planning in this area previously. I hope you learn and adapt to prevent a repetition.

My last point concerns my expertise in Capital Works and Emergency Accommodation for educational facilities. Primary schools require 3-5 hectares and Secondary Schools 10 ha irrespective of private or public ownership. I found no mention of the effect on school enrolments for 4,100 - 6,000 new residences. At one time the departments Demographers desks were near mine. Demountable buildings can accommodate peak enrolments and renovations but take up valuable land that gardens and play areas lose.

Some of the private schools astride Pennant Hills Road are beyond the budgets of middle income Australia. The few public high schools nearby could quickly be overwhelmed. Primary schools need to be within cycle or walking distance of home. Their will be an increased need for Trade Training focused on industry needs in the North Parramatta Precinct.

Thank you for providing the opportunity to comment on your plans.

Mr Chris GARDINER.

Sent from my Windows Phone



Scottish Australian Heritage Council Inc

Patrons of Scottish Heritage Week
The Right Honourable the Earl of Dunmore
Sir Wayne Broun of Colstoun and Thornydykes Bt
The Honourable Douglas McClelland AC

Patron in Scotland
The Right Honourable the Earl of Errol

18 December 2014

Ms C. McNally
Secretary
Department of Planning & Environment
GPO Box 39
SYDNEY NSW 2001

Dear Ms McNally,

North Parramatta Urban Renewal Plan

The Scottish Australian Heritage Council is writing to make the following submission about UrbanGrowth NSW's North Parramatta Urban Renewal Plan.

The Council holds grave fears that the Plan as presented will have a devastating impact on what has to be the most significant heritage precinct in Australia. The reasons for our concerns are outlined below:

- That the declaration of the project as one of State Significance removes the NSW Heritage Council from the decision making process. If there was ever a situation where the Heritage Act and its operational authority were necessary to protect and preserve our national heritage, surely this is it. Only the proper involvement of the NSW Heritage Council in the decision-making process will produce a worthwhile development for the people of Parramatta, the State of New South Wales and the Australian Nation
- The area outlined in the Plan has been predominantly public land since early European settlement and its continued management and control should remain as an integrated precinct that is managed by a single government agency to ensure the long term survival, co-ordinated maintenance, conservation and presentation of this state and nationally significant cultural landscape
- The proposal places undue development pressures on the landscape and heritage of an area that will be much needed for open space for the increasing Parramatta population in coming decades

- The scale and quantity of development proposed is contrary to the principles and guidelines provided in the Conservation Management Plans prepared for the NSW Heritage Council in conjunction with the State Heritage Register Listings
- That the excessive development indicated in the concept drawings will become even more intensive given the past history of the Parramatta City Council for increasing building heights following subsequent applications after the initial approvals
- Given the location, heights and density of buildings outlined in the proposal I vigorously oppose:
 - the construction of new multi-storey buildings in the Female Factory precinct
 - the construction of 16 storey buildings directly adjoining the Recreation Hall, Chapel and Parramatta Gaol
 - the construction of 4, 6 and 8 storey mixed use developments in Parramatta Park along O'Connell Street
 - the demolition of the highly significant residence of the Chief Attendant, 9 Fleet Street
- That in addition to the points above it is essential that the Central Male Block which has a heritage value of "high significance" be retained
- That parking provisions are inadequately addressed in the proposal and before any rezoning is contemplated a detailed analysis undertaken so that the full implications this issue are placed into the public domain
- That the photomontages presented in the proposal appear to be very misleading and understate the impact on viewlines and values of the World Heritage Listed Old Government House and Domain
- That the proposal does not adequately address Aboriginal heritage, cultural and landscape perspectives and therefore further involvement of the Aboriginal community in decision making regarding this project be undertaken.

In conclusion, whilst I support the principle of sensitive adaptive re-use of heritage buildings, so as to provide for their ongoing heritage conservation and presentation, the lack of the necessary controls and management of such measures is not adequately assured in this proposal and until such is provided I cannot support its endorsement.

Yours sincerely,



Malcolm Buchanan
President

Scottish Australian Heritage Council
PO Box 787
Civic Square ACT 2608

Louise Mansfield

From: Neil Sheridan <sheridanns65@gmail.com>
Sent: Thursday, 9 April 2015 10:03 AM
To: information-Planning
Cc: Neil Sheridan; parramatta@parliament.nsw.gov.au
Subject: Parramatta North State Significant Site

Attention Anna Johnston.

As a long term resident of North Parramatta I am horrified at the haste and lack of in depth consultation that has been shown with this project.

The Significance of this site is enormous from the aboriginal, architectural, historical, archeological, botanical and environmental aspects.

Submissions from experts in these fields appears to be ignored in the haste to damage this state significant area.

The site has national and international significance for its heritage value.

I attended the Christmas consultation period at the Parramatta Town Hall. Not only was it washed out when the roof looked like collapsing in a storm, but the whole process was a white wash with inexperienced people acting like Real Estate Agents promoting the plans of Urban Growth.

If Parramatta is to be a livable and vital City of the future then a master plan needs to be developed not a headlong rush of Bulldozers.

I trust that you will reconsider the consultation process for this project in view of a Master Plan for Parramatta which will properly consider traffic flow, public amenity and the sanctity of public land for public purposes.

Neil Sheridan

Anna Johnston

From: Terry Smith <terry@97k.com>
Sent: Monday, 5 January 2015 8:44 PM
To: information-Planning
Subject: Parramatta North Urban Renewal Development

To Whom it May Concern,

As a "stakeholder" who was invited and attended the two Charrettes organised in Parramatta last year, I believe that my views are already well known to the team proposing this project within Urban Growth. My comments concern the heritage precincts of the Girls Industrial School, Cumberland Hospital and the Parramatta Gaol.

For the purposes of this submission, I do not see much point in forensically dissecting every detail of the proposal and the progenitors of it have been already made well aware of how historically significant and sensitive the site is! So I think a couple of brief general remarks will suffice.

Whilst not happy about it, I had accepted that some development of the site may be necessary to offset the costs of heritage restoration and preservation. However, I was very disturbed to find that the public display of the proposals had a significant omission; the planned construction of 2000+ more units on the Parramatta Gaol and former site of the Female Division of the Parramatta Lunatic Asylum currently subject to an Aboriginal Land Claim. It was made clear at the Charrettes that win or lose, those areas under contention will be subject to high density development! What was displayed omitted the large number of high-rise buildings that will be necessary to accommodate these units (some within the gaol walls)! The display also omitted the proposed bridge over Darling Mills Creek to the north, that was deemed necessary for residents to access the development. This gave the impression that there was less pressure and crowding of the heritage sites than is actually planned!

I can accept that it is unreasonable at this stage of the planning process to have every detail elucidated, however the omission of 2000+ units and a road bridge is not a detail! In fact it feels deceptive! During the Charrettes, attendees were informed in no uncertain terms that development was necessary to ensure that resources could be made available for the restoration, preservation and realisation of tourism potential of this *Nationally Significant* heritage site. Whilst Urban Growth has quite adamantly prosecuted the need for high density development providing concrete proposals for a large number of high-rise towers, it has not proffered a single tangible plan for ANY of the heritage buildings, except for a vague notion that the heritage precincts could be opened up for tourism, commercial or arts use! These vague ideas were said to have a potential cost of hundreds of millions of dollars! How could there be any idea of potential costs when there is no firm idea of potential future uses? In spite of Urban Growth's (and thus the Government's) argument that heritage protection is at the heart of this proposal, it seems clear that it is in fact an exercise in asset realisation grossly excessive to the needs of the heritage precinct's preservation and future conservation! Indeed it is entirely possible that the precincts will be asset realised and NO resources made available at all for the future of the heritage buildings!

The above points obviously go to the credibility of the development proposal, which I now believe to be seriously flawed!

If Urban Growth expects any support from people like me, it will need to address the question of the proposal's credibility, because if it doesn't I for one will be a staunch lobbyist against any development of the area!

I believe that BEFORE Urban Growth begins the process of divvying up the site to developers, it needs (in proper PUBLIC consultation with heritage advocates and historians) to develop credible and viable proposals for the future use of heritage buildings and sites! Then some idea of the cost of restoration/conservation could be ascertained. What is needed in terms of development to pay these costs can thus also be more clearly ascertained. The resultant decisions of these consultations can be

incorporated as mandatory requirements for all development and future use proposals within the heritage sensitive parts of the site.

Without proper and firm proposals, decisions and plans for the heritage precincts, the current development proposals must only be viewed as another project to fill government coffers at the expense of Australia's heritage ,and also to fill the pockets of developers and investors at the expense of the people of Parramatta!

Dr Terry Smith

R.N., B. App. Sc., M. Nursing, PhD.

The above points go to the heart of what I now believe