

2 November 2020

Via email: parracbdplanning@cityofparramatta.nsw.gov.au

City of Parramatta Council
Attention: Parramatta CBD Planning Proposal Team (Ref: F2020/02641)
PO Box 32, Parramatta NSW 2124

Parramatta CBD Planning Proposal (Ref: F2020/02641)

I write regarding *Parramatta CBD Planning Proposal (the planning proposal)* prepared by Parramatta Council.

The planning proposal is supported in principle in so far as it seeks to amend planning controls throughout the Parramatta CBD, with the goal of significantly expanding and intensifying commercial activities and supporting higher density mixed use and residential development. The Urban Taskforce encourages planning changes to enable the significant growth planned for the Parramatta CBD as outlined in the Central City District Plan and supported by the Sydney Metro West rail line.

The growth of the Parramatta CBD has the capacity to assist with Sydney's post-COVID economic recovery. However, the private sector investment needed to deliver this recovery will be dependent on CBD having the right boundaries, level of development controls and reasonable infrastructure contributions to ensure feasibility of development. To that end, the Urban Taskforce oppose:

- the overly complex and prescriptive development controls that will exclude many sites from being feasible for redevelopment
- the limited extent of the CBD boundary that is contrary to actual cadastral boundaries and fails to fully realise the development opportunities coming out of the Sydney Metro West, and
- the lack of clarity on, and concerns about the quantum of development contributions to be applied across the CBD

Overly-complex and prescriptive development controls

Floor Space Ratio

Specific objection is raised to overly complex, multi-layered FSR controls. Feedback from Urban Taskforce members is that the practical effect of the five tiered, sliding scale of available FSR is a restrictive "sweet spot" of site areas that can actually deliver feasible development. The controls as proposed, limit development of sites under 1,800m² and over 3,000m².

Both smaller and larger sites have the capacity to contribute to State Government jobs and housing targets and the Council's vision for the City of Parramatta. Accordingly, FSR and building height controls should facilitate the revitalisation of all available sites within the CBD, with the design and amenity consequences considered as part of the development assessment process.

The non-residential minimum FSR requirement in the B4 Mixed Use zone is excessive. This is particularly the case for large sites away from the CBD core. On such sites, the control will require the provision of up to 2:1 of above-ground commercial/office space. In reality, most B4 sites cannot compete with other properties/sites in the B3 Commercial Core in attracting commercial tenants or owners. For Parramatta to build on its status as the heart of Sydney's 'Central River City' and build on its economic role and significance, a less prescriptive approach to planning is required to facilitate market responsive development and investment.

Car parking

Urban Taskforce members developing in the Parramatta CBD advise that residents seeking a home here, require at least one or two car parking spaces. The proposed car parking controls are excessively low and fail to consider local consumer preferences.

Given the floodplain considerations in undertaking development in the CBD, Council should promote above-ground parking, where possible, to avoid deep basements that are subject to flooding and could allow alternative uses into the future if car dependency was to reduce.

The Urban Taskforce **recommends** that beyond zoning, a straightforward FSR and height control - the re-development capacity of sites be determined by site specific, merit-based impact assessment.

Extent and accuracy of the CBD Boundary

Urban Taskforce notes proposed controls (FSR and height) and zoning boundaries on the LEP maps do not align with the actual cadastral boundaries of land and development sites within the CBD. This will make it difficult for development of some parcels of land given there is not a consistent set of controls for development.

The planning proposal also fails to reflect recent, DA approved development on various blocks within the CBD. That is, there are various sites within the CBD that have been subject to development consent and/or under construction, and the proposed controls (zoning and standards) do not reflect what has already been approved and will be constructed. Therefore, there are controls that are proposed (and existing within the Parramatta LEP) that will not appropriately reflect the future character of the area. This includes the B3 Commercial Core zone, which does not follow a logical alignment for some sites in the CBD.

The Urban Taskforce **recommends** the planning proposal needs to adopt the basic planning principles of aligning controls with the cadastral outline of properties and development sites (including DA approval), so that when future DAs for development are lodged there are sensible and clear controls for each site.

The Urban Taskforce opposes the proposed boundary of the CBD in that it fails to fully capitalise on both the existing Western (heavy) rail line, the Sydney Metro West line, and the light rail currently under construction to service the CBD. Areas and sites that are within close proximity of existing and proposed rail stations and light rail stops have been excluded from the planning proposal. This exclusion is contrary to earlier planning proposal recommendations from Council officers and is at odds with unlocking the major investment in transport by encouraging higher density housing.

Unanticipated changes in direction creates uncertainty for investors. As a consequence, this change may impede the vision for Parramatta being realised by limiting and/or delaying the development of key sites and the delivery of much needed employment opportunities and new housing stock. To facilitate on-going investment confidence and development activity in Parramatta, the Urban Taskforce **recommends** that in considering the Planning Proposal the Council commit to a timeframe and budget to consider the deferred areas.

Council's current planning proposal explains that some areas have been excluded on the basis of impacts to nearby heritage conservation areas. There are many good examples of sensitive and appropriate new development in and adjacent to heritage areas. Accordingly, the Urban Taskforce **recommends** that Council consider heritage conservation areas as not a constraint on development but rather how it is done.

The Urban Taskforce further **recommends** that sites outside the boundary of a heritage conservation area that are within close proximity of a railway station or light rail stop be included for development uplift with development control consistent with the adjacent CBD sites.

Quantum of Development Contributions

The planning proposal sets out that the CBD will be subject to at least three layers of potential contributions, yet no details are as yet provided on the cost of these. While the Urban Taskforce supports proponents making contributions towards the cost of providing essential infrastructure to service new development, it's critical that the cumulative cost of levies is reasonable so as to not stifle investment and the delivery of important jobs and housing.

The contributions strategy must be clear and rational. Council and the State Government must be accountable for monies collected and clearly demonstrate how the contributions are to be managed. If there is a need for VPAs, the process must be standardised, efficient and be as quick as the DA process with any

contributions payable at the end of the project where the projects are in a far better cash-flow position.

In delivering an LEP that provides for feasible development, the Urban Taskforce **strongly recommends** that both Council and State Government consider the cumulative impact of all proposed development contributions. Urban Taskforce also **recommends** that local and state infrastructure contributions are finalised in consultation with the development industry.

The Urban Taskforce looks forward to on-going engagement with Council in working towards an LEP that delivers on the aspiration for the Parramatta CBD to become Sydney's 'Central City'.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Tom Forrest', with a stylized flourish extending to the right.

Tom Forrest
Chief Executive Officer