

## **AGENCY SUBMISSIONS**

<b>Submission Author</b>	<b>Key Issues Raised</b>	<b>Council Response</b>
Civil Aviation Safety Authority (CASA)	Submission notes that at 203.22m AHD (i.e. 180m above ground level) the proposed maximum building height will impact on the prescribed airspace for Bankstown Airport. The site is also in the vicinity of the Westmead Hospital Helicopter Landing Sites (HLS). It is recommended that Bankstown Airport and helicopter operators who use the Westmead Hospital HLS be consulted.	Bankstown Airport were consulted as part of the public exhibition. Refer to the submission below.  Helicopter operators who use Westmead Hospital HLS were consulted through NSW Health Infrastructure, the relevant division of NSW Health. Refer to the submission below.
CASA – 2 <sup>nd</sup> submission	Noting the location of the site in the southern CBD, Council sought clarification on whether it would be more appropriate to seek comment with helicopter operators of the Westmead Hospital HLS at the DA stage. A second submission from CASA agreed that seeking input from helicopter operators at Westmead Hospital can be sought at the DA stage, noting that in previous consultations operators have raised no objection to Planning Proposals of greater height located closer to Westmead Hospital.	Council notes this submission.
Sydney Metro Airports – Bankstown Airport	The maximum building height of 180m would penetrate the Outer Horizontal of the Obstacle Limitation Surface which is set at 156m. As a result, a future development application would be required to be referred to both Airservices Australia and the Civil Aviation Safety Authority for review prior to the Department of Infrastructure and Regional Development providing a final determination.  Bankstown Airport will require formal notification to undertake a review at the DA stage, which should include an aviation assessment reflecting the final building height proposed. The use of cranes where the crane height reaches 156m AHD or higher also requires the above process to be followed.	Council notes this submission. In the event a development application is lodged for this site, an aviation assessment would be required if the proposed height exceeds 156m AHD. The agencies identified in this submission would also be notified as part of the standard process for an integrated development application.
Department of Infrastructure & Regional	Construction of the building may require under the Airports (Protection of Airspace) Regulations 1996, including assessment by the Civil Aviation Safety Authority and Airservices. Submission recommends that Bankstown Airport	Council notes the submission. In the event a development application is lodged for this site, an aviation assessment would be required if the proposed

Development (DIRD) – Aviation & Airports Division	continue to be notified of the planned final height of the building as well as any associated crane activities to ensure that any approvals that may be required can be obtained.	height exceeds 156m AHD. The agencies identified in this submission would also be notified as part of the standard process for an integrated development application.
Endeavour Energy	<p>No objections are raised to the Planning Proposal; however, the following comments were made:</p> <ul style="list-style-type: none"> <li>• There is currently an easement over the site benefiting Endeavour Energy for a substation. Redevelopment of the site will require the decommissioning and relocation of the substation to an appropriate location and be protected by an easement and associated restrictions that benefit Endeavour Energy.</li> <li>• It is noted that the Revised Reference Design drawings do not show the existing substation or the proposed location of a future substation. Endeavour Energy requires that the substation be located at ground level with access directly from a public road.</li> </ul>	Council notes this submission. It is considered that the comments regarding the decommissioning and new location of the substation servicing the site can be addressed in a future development application.
Office of Environment & Heritage (OEH) – Heritage Division	The submission states that the Proposal as exhibited only provides a brief statement of potential heritage impacts relating to archaeology and is not accompanied by a Heritage Impact Statement or Archaeological Assessment. OEH recommends that Council be satisfied that the proposed FSR and height increase will retain the heritage significance of items in the vicinity, which. could include a review of the current Development Control Plan (DCP) to ensure that the urban design and heritage controls are sufficient to guide future appropriate development on the site.	<p>Council is satisfied that the current development control plan will allow for appropriate development on the site.</p> <p>The Parramatta CBD Planning Proposal is supported by two heritage studies. Both studies concluded that subject to appropriate planning controls and treatments, increased densities and heights could be accommodated satisfactorily within the CBD with respect to heritage.</p> <p>The Urbis (December 2015) study reviews, at a high level, the impact and issues associated with the scale of density and height increases proposed across the CBD. The study concluded that subject to appropriate planning controls and treatments (e.g. protection of solar access, appropriate setbacks, design principles etc.) that increased densities and heights could be</p>
	The site is located within Archaeological Management Unit 3060 which is identified to be of local significance with moderate archaeological research potential. It is recommended that an archaeological assessment be required for any future development application.	
	The Heritage Division remains concerned with the number of site specific planning proposals seeking density increases. At the time of writing the submission, OEH had yet to receive additional heritage information being prepared by Council in support of the CBD Planning Proposal. It has previously been recommended by OEH that the CBD Planning Proposal should be	

	<p>resolved prior to further consideration of individual site proposals seeking increases in density.</p>	<p>accommodated satisfactorily with respect to heritage. The study recommended an FSR of 10:1 for the site and surrounding area.</p> <p>A further heritage study was undertaken by Hector Abrahams on behalf of Council in July 2017 following concerns raised by the Office of Environment and Heritage (OEH) in relation to those areas of the Parramatta CBD that interface with heritage conservation areas. The subject site is not part of this study area.</p> <p>The concerns raised by OEH relate to a broader issue about how the Parramatta CBD can progress and develop into Sydney's Central City whilst preserving its heritage. Resolution of this issue is beyond the scope and matters for consideration of this site specific Planning Proposal. Whilst taller buildings have impacted upon heritage items, they have been previously accepted as being reasonable considering the future character and form of development likely to occur in Sydney's second CBD.</p> <p>In relation to the archaeological assessment, Council notes and agrees that this matter can be addressed at the development application stage.</p>
Transport for NSW (TfNSW)	<p>As the site is located around 300m from the Parramatta Interchange and approximately 400m from the proposed Parramatta Light Rail (PLR) route. It is requested that the proponent consult with TfNSW (PLR teams and Sydney Coordination Office) as part of any future development application to ensure the proposed development is serviced in a way that does not create congestion to transport networks or pedestrian conflicts; and to ensure construction activities are coordinated with PLR construction activities.</p>	<p>Council notes the submission.</p>

Roads & Maritime Services (RMS)	The submission notes and supports the inclusion of a site-specific clause that requires car parking rates in accordance with the Parramatta CBD Strategic Transport Study.	Council notes the submission – the Planning Proposal as exhibited identifies that a site specific clause would be provided to require maximum car parking rates in accordance with the Parramatta CBD Strategic Transport Study.
	The submission references DA/706/2014, which is an approved concept DA that established the building envelopes for a future staged development on the site to the south of the Great Western Highway. The submission notes that RMS has provided Council with advice relating to the recommended timing of the completion of design and delivery of the pedestrian bridge to RMS requirements. The submission suggests that the schedule proposed be reflected in the draft VPA.	Refer to Council report.
	<p>The submission recommended that Clause 6.2(a) of the draft VPA be amended to include additional text [marked in <b>bold</b> below]:</p> <p><i>“Clause 6.2(a)</i></p> <p><i>(i) Development Consent DA/706/2014 applying to land on the southern side of the Great Western Highway requires the developer of that land to enter into a Deed with Roads and Maritime Services NSW, to construct a pedestrian overbridge <b>at full cost to the developer</b> at the intersection of the Great Western Highway and Church Street;</i></p> <p><i>(ii) if that pedestrian bridge is constructed, the Easement Land, on the northern side of the Great Western Highway, will be required <b>wholly within the subject land</b> to accommodate the pedestrian bridge.</i></p> <p><i><b>(iii) provision of the easement land will be at no cost to Roads and Maritime and Council.</b></i></p>	Refer to Council report.

	The submission suggests that the location of the pedestrian bridge landing and the continuation of the pedestrian desire line to Church Street towards Parramatta train station be considered as part of the design excellence process.	Refer to Council report.
	In relation to vehicular access, the submission raises no objection to a left-in only access to Church Street and a left-out only access point at the Great Western Highway. The submission also refers to other technical recommendations relating to the turning movement of trucks, and possible easements requirements to facilitate access into and out of the site.	Council notes the recommendation, and considers that these issues are matters to be addressed at the development application stage. As the subject site adjoins a classified road, RMS will be invited to provide comment during the public exhibition of a future development application.
	The submission recommends that appropriate noise attenuation measures including double glazing should be considered to mitigate future residential dwelling against road traffic noise.	Council notes the recommendation, and considers that the issue can be addressed at the DA stage.