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PO Box 32
PARRAMATTA NSW 2124

Dear Mr. Rubcic

Planning Proposal – 163-165 George Street, Parramatta

Thank you for your letter dated 22 January 2019 inviting Transport for NSW (TfNSW) to provide advice regarding the subject proposal.

The proposal seeks approval for an additional permitted use on the subject site, which is Zoned SP1 – Educational Establishment and Place of Public Worship, to enable the establishment of a commercially operated car park and for additional building height to allow for the construction of a Grand Cathedral. It is understood that the additional permitted use, if it were approved, would be achieved via a site-specific clause which allows the car parking at the subject site to be used as a commercially operated car park in addition to the church and ancillary uses.

We note that the nature of this additional use is not an ancillary use to the dominant use of the site as the car parking will be predominantly commercially operated and provides parking beyond what is reasonably required to support the dominant use and principal purpose of the future development on site (place of worship). It is also noted from the indicative architectural drawings that the proposed car park would be intended to occupy a substantial proportion of the site. In such circumstances, the development could be described as a mixed use development which may not be aligned with the objectives of the zone. Council may wish to refer to practice note *PS 13-001: How to characterise development* issued by DPIE.

TfNSW would like to state that the description of public car park does not reflect the intended nature of the car parking development. An accurate description of the proposed car parking is a commercial car park.

The proximity and configuration of the predominantly commercial car park that would be facilitated by the Planning Proposal would likely result in direct and potentially unmanageable impacts on the Parramatta Light Rail (PLR) operations, including safety.

The proposed additional use of a car park of this scale will fundamentally alter traffic and pedestrian activity in the vicinity of the PLR. There would be significant increases in flows of vehicular traffic adjacent to and across the PLR. This traffic is proposed to be uncontrolled at the George Street entry/exit.

In light of the above, the proposed additional use of a car park from an operational perspective cannot be supported at this stage. The following information is provided for Council's consideration:

- The traffic and parking assessment report has not taken into consideration the future road network changes and traffic condition changes – especially in relation to the PLR currently under construction;

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- The traffic and parking assessment has also not provided an adequate assessment on the local infrastructure requirements such as footpath widths, crossing points and increased waiting areas on footpaths at nearby intersections. It is important to understand these issues considering the future light rail and other enabling infrastructure works immediately adjacent to the subject proposal;
- The subject site fronts George Street that forms part of the PLR network. The subject section of George Street and a section of Purchase Street have been declared a Transitway under the *Roads Act 1993* (the extent is shown in green outline at **Attachment X**). Any future development applications on the subject site, would need to take into account the construction and operational phase of the PLR project (particularly relating to vehicular access), as there will be intermittent, short and long term road closures and changes to the road network operation.

Furthermore, proposed vehicular access will need to consider access management principles of ISEPP 2007; that is access should be from a road other than the classified road. It is noted that the architectural drawings, as an appendix to the traffic report accompanying the subject proposal, indicate a new vehicular access located at the northwest corner of the subject site on George Street which is in conflict with these principles. Should the planning proposal proceed, despite TfNSW's concerns, we request a site specific Development Control Plan (DCP) is prepared to set out the access arrangements to align with ISEPP 2007; the vehicular access should be on Purchase Street towards the southern end of the site to prevent vehicles queuing back to the intersection with George Street.

It is evident that a strong nexus exists between the nature of the proposed additional use of a commercially operated car park and potential direct impacts on the Parramatta Light Rail at both the construction and operational stages.

In consideration of Condition 5(c) stipulated in the Gateway Determination, TfNSW objects to the subject proposal being finalised in its current form.

Subject to the outstanding issues outlined in **TAB A** being resolved, we would be willing to reconsider our position on the Planning Proposal. It is strongly recommended that the proponent consults with TfNSW including but not limited to our PLR Project Team to discuss these matters, in order to address the concerns with the subject proposal.

Thank you again for the opportunity of providing advice for the subject proposal. If you require further information or wish to arrange a meeting to further discuss these matters, please do not hesitate to contact me via phone on 0439 489 298 or email mark.ozinga@transport.nsw.gov.au. I hope this has been of assistance.

Yours sincerely



2/3/2020

Mark Ozinga

Principal Manager Land Use Planning & Development
Customer Strategy & Technology

CD20/00680

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Statement / Requirement	TfNSW PLR comment
Gateway Determination	
<p>Condition 2 determines that the proposal to amended the <i>PLEP (2011)</i> should proceed subject to:</p> <p><i>2. Consultation is required with the following public authorities:</i></p> <ul style="list-style-type: none"> • <u>Transport for NSW – Parramatta Light Rail</u>; • <i>Transport for NSW</i>; and • <i>Heritage, Department of Premier and Cabinet.</i> 	<p>The proponent did not undertake consultation with Transport for NSW prior to the exhibition of the planning proposal. Car park and vehicular access via the George Street frontage is not supported by TfNSW without further assessment and justification.</p> <p>The proponent will need to address the following matters in consultation with TfNSW:</p> <ol style="list-style-type: none"> 1. How they intend to address the ISEPP. The subject section of George Street and a section of Purchase Street have been declared a Transitway under the <i>Roads Act</i> and therefore proposed vehicular access will need to consider access management principles of Infrastructure SEPP 2007 (ISEPP). Should the planning proposal proceed, we request a site specific Development Control Plan (DCP) is prepared to set out the access arrangements in accordance with ISEPP. The vehicular access should be on Purchase Street at the southernmost point, to prevent vehicles queuing back to the intersection with George Street and impacting future light rail operations; 2. If it is demonstrated that vehicular access cannot be reasonably obtained on Purchase Street and in-principle agreement is given by TfNSW to vehicular access via George Street, the proponent will need to assess and mitigate safety impacts associated with the proposed driveway access crossing George Street; 3. How the proposed driveway access crossing George Street would operate, including phasing; 4. the impact to Parramatta Light Rail operations; 5. the impact to the road network, in particular on the George/Purchase St signalised intersection and George St/Harris St signalised intersection; 6. The impact to Green Track caused by overshadowing; and 7. Impacts to the precinct in relation to increased pedestrian and cyclists' movements to and from the site. <p><i>It is noted that:</i></p> <ul style="list-style-type: none"> - <i>the proponent would need to demonstrate that there is no impact to operation, safety and structural integrity of the light rail system;</i> - <i>the proponent would need to demonstrate that the impacts to the road network are acceptable and that the design and operation of the vehicular access is acceptable;</i> - <i>should the increase in height cause shadowing that affects the grass track, this would need to mitigated against;</i>

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	It is recommended that the applicant address the above.
Gateway Determination Report	
<p>Section 5.8 states :</p> <p><i>The current development application seeks to locate the car park entry from George Street (which contains the Parramatta Light Rail). There is potential conflict with the Parramatta Light Rail network. Council have advised that this issue has been resolved through the assessment of the DA.</i></p>	<p>The statement in the Gateway Determination report that the issue of the car park entry conflicting (impacting) the Parramatta light rail network <u>is not resolved</u>.</p> <p>We refer CoPC to our previous correspondences. The Notice of Determination issued by CoPC does not reflect the previous recommendations made by the PLR Project Team <i>Transport for NSW – Parramatta Light Rail</i> to consider a shared signalised access via 153/155 George Street to be provided by TfNSW.</p> <p>It is noted that signalised access via 153/155 George Street is documented in the <i>Urban Design Requirements “Blue Book”</i> which forms part of the <i>Development Agreement Parramatta Light Rail</i>, which has been entered into by CoPC and TfNSW dated 28 March 2018.</p> <p>Our previous correspondences include:</p> <ul style="list-style-type: none"> • 7 September 2018 – Letter from PLR Program Director to CoPC Development Assessment Officer <i>RE DA/469/2018 163-165 George Street, PARRAMATTA NSW</i> • 19 October 2019 – Letter from PLR Program Director to CoPC Development Assessment Officer <i>RE: DA/469/2018 163-165 George Street, PARRAMATTA NSW</i> • 19 December 2019 – Email from PLR Manager Major Stakeholders to CoPC PLR Lead <i>RE: TfNSW driveway & signals letter 163-165 George Street Parramatta.</i>
Planning Proposal St Ioannis Greek Orthodox Church	
<p>In section 5.1.3 the proponent has stated that the Planning Proposal is consistent with SEPP (Infrastructure) 2007 and that:</p> <p><i>Future development may constitute traffic generating development and trigger an assessment under this SEPP.</i></p>	<p>The subject site fronts George Street that forms part of the PLR network, which has been declared a Transitway under the <i>Roads Act</i>. A section of Purchase Street (along the frontage of Lot 1 DP650704) has also been declared a Transitway under the <i>Roads Act 1993</i> (see Attachment X). Clauses 101 and 104 in the <i>State Environmental Planning Policy (Infrastructure) 2007</i> (ISEPP) are relevant to the proposed vehicular access and requires the consent authority to consider certain matters when a development is on land that has a frontage and/or direct vehicular or pedestrian access to a classified road. In this case there is frontage to an alternative local road which should be used rather than George Street and the northernmost section of Purchase Street. We request a site specific DCP is prepared to set out the access points aligned with the principles of ISEPP 2007 to guide any future development applications. This should show access at the southernmost end of the Purchase Street frontage if practical.</p>

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<p>Section D – State and Commonwealth Interests section 8.1.1 states that:</p> <p><i>The traffic and parking assessment demonstrates that there is adequate capacity in local roads and intersections to accommodate the proposed car park of the existing parking and that any expansion of the carpark would be the subject of further assessment at the time of a development application lodgement.</i></p>	<p>The PLR Project Team has reviewed the <i>Traffic and Parking Impact Assessment (March 2018)</i>, which has been provided in support of PP_2019_COPAR_012_00.</p> <p>The development proposes to have 568 carpark spaces following completion of Stage 3 – construction of a 6-level basement carpark, and access to the basement carpark will be provided at Purchase Street and George Street.</p> <p><u>PLR Project Team provides the following comments:</u></p> <p>Roads</p> <ol style="list-style-type: none"> 1. It is not evident that the future road network changes and traffic condition changes with Parramatta Light Rail were considered. 2. The SIDRA traffic modelling conducted in the document assessed the base scenario (assumed to be 2018) using base traffic volumes and road network configuration. It is not clear on what was included in the POST DEV SIDRA traffic modelling. The traffic modelling needs to assess the future scenario with Parramatta Light Rail using forecasted traffic volumes and road network changes. Electronic copies of the modelling should be provided to TfNSW for review and verification. 3. The described Transport Services in the document does not include the future Parramatta Light Rail as an alternative transport service for the development. 4. Although the document mentions Parramatta Light Rail as a Future Circumstance, there is no evidence in the report that introduction of the Parramatta Light Rail was included in the assessments. 5. The document describes <i>“The GTA study (as part of the PLR EIS, Aug 2017) indicated that a single westbound traffic lane will be provided between Purchase Street and the property access at 153 George Street and it is envisaged that the site’s access could also share this access handle”</i>. The PLR EIS, however, states that the single westbound traffic is to be used only for the access to 153 George Street, and the EIS assessment was based on the low traffic volumes that would access 153 George Street. The PLR EIS assessment also included the egress from 153 George Street to cross the project corridor (i.e. light rail tracks) based on the low traffic volumes. Additional traffic volume due to the proposed development needs to be assessed further by the developer. 6. The PLR design development has progressed since the issue of the PLR EIS and now does not include the single westbound traffic lane to access 153 George Street. The current PLR design involves a traffic control signal at George Street to allow access in and out of 153 George Street. The proposed development needs to incorporate the current PLR designs in its assessments.
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	<ol style="list-style-type: none"> 7. The Parking assessment does not include the assessment of pedestrian flow and desire lines as a result of the introduced commercial parking 8. Further assessment needs to be conducted by the developer that clearly describes the traffic impacts as a result of the proposal with the changes in traffic conditions and road network changes in the future (that is with Parramatta Light Rail). The assessment needs to include associated risks associated with the proposed intensification including traffic impacts and proposed access arrangements. The assessment also needs to include all road-users, such as cyclists and pedestrians. 9. Travel Demand Management Measures - <p>Given the proximity of the site to the Parramatta CBD and with Parramatta being identified as a Metropolitan Centre under the Greater Sydney Region Plan 2018, consideration should be given to how the proposal addresses travel demand management. Initiatives to reduce the reliance on the use of private vehicle use within the CBD would generally be supported. This may include removal and relocation of public car parks within the CBD to appropriate locations outside of the CBD to offset parking loss. We understand that Council's existing Integrated Transport Plan for Parramatta City Centre dated 24 May 2010 sets out a long term strategy to remove car parking from within the CBD centre and offset this with two potential new car parking facilities on the periphery of the CBD.</p> <p>However, in this instance it appears the proposed car park use is not associated with a removal of a car park within the CBD and will not be used to offset existing parking facilities within the CBD. Rather the proposal will provide additional parking to existing parking, which may undermine the overall travel demand management and public and active transport initiatives within Parramatta by encouraging private vehicle travel to Parramatta over alternate modes. The car park is a short walking distance to the CBD and existing train station and may encourage people to drive to Parramatta for work and other trips. This may set a precedent for similar proposals.</p>
Heritage Referral: Planning Proposal at 163-165 George Street	
General comment	Recent Heritage investigations for Robin Thomas Reserve indicate that there are buried heritage items of State and National Significance dated circa 1804 that are located on the north western corner of the lot, (frontage closest to George Street and adjacent to 155 George St).

An aerial photograph of a suburban area in Parramatta, New South Wales. The map shows various residential lots, some with buildings, and others that are vacant or under construction. A yellow rectangular boundary highlights a specific area in the center-left, which includes a large building complex and several smaller lots. Roads visible include Alfred St, George St, Hassall St, Parkes St, Purchase St, and Noller Pde. Numerous lot numbers and parcel identifiers (e.g., DP1151643, DP128847, DP444716) are labeled throughout the map. The word "PARRAMATTA" is written in blue capital letters across the middle-left portion of the image.