

Summary of Submissions

PP-2022-376



Submission Name	Issues Raised	Proponent Response	Department Response
Council Submission			
Parramatta City Council	Building height The site is outside of the established precincts identified for higher density development in the LSPS. Proposed building height of 49m (15 storeys) is out of character with surrounds. Suggestion of maximum 28m (9 storeys) to respond with existing context	Council officers previously (2019) expressed support for an FSR of 2.1:1 and a HOB of 49m on the site	The Department supports the proposed height transition proposed utilising the tower elements to concentrate the heights within the north-east corner of the site which is closest to the Carlingford Growth Precinct with heights of up to 57m.
	Podium height A podium of a maximum 3 storeys should be provided instead of 4, 6 and 10 storeys with a maximum building depth of 22m to ensure internal amenity to apartments.	The current indicative scheme includes a 2 storey commercial podium. A 'stepped' residential tower is incorporated above, with total heights (including the 2 storeys of podium) of 9, 10 + 14 storeys. A separate, 3 storey, row building is located in the western portion of the site The proposed tower and podium arrangement outlined in the indicative scheme provides appropriate transition to neighbours (lower and higher density) and an attractive and articulated appearance to Pennant Hills Road. Podium Building Depth can be addressed through the preparation of a site specific DCP and / or during the DA process.	The Department has no objection to the 2 storey commercial podium interface with Pennant Hills Road.

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	<p>Tower</p> <p>Recommend a maximum height to the main tower element of 29m.</p> <p>Secondary tower height to the north up to a maximum of 5 storeys to ensure transition to the west..</p>	<p>The proposed 2.1:1 FSR and 49m HOB and massing proposed in the accompanying indicative scheme is appropriate for the subject site.</p> <p>The indicative scheme prepared to support the Planning Proposal is one example of how the 2.1:1 FSR can be distributed on the subject site, within the proposed 49m height plane. More specific massing outcomes can be negotiated with Council through the preparation of a site specific DCP and / or during the DA process.</p>	<p>The Department support the proposed tower elements and their transitional function connecting the site between disparate height and density characteristics.</p> <p>The Departments Urban Design Team are confident that the tower elements will facilitate greater setbacks including the through-site link by stacking density within tower portions of the site.</p>
	<p>Bulk and scale / interface with surrounding low-density development</p> <p>A maximum tower floor plate length of 45m recommended to reduce bulkiness along Pennant Hills Road. Remove podium overhang over through-site link which amplifies bulk and scale.</p> <p>Recommendation to open this to improve solar amenity and encourage use of the feature.</p> <p>Interfaces</p> <p>West – utilise this areas as a through-site link with no development along this boundary.</p>	<p>The indicative scheme prepared to support the planning proposal illustrates – in principle – appropriately articulated facades to both street frontages. It includes:</p> <ul style="list-style-type: none"> • steps in the building massing • deep vertical and horizontal recesses • clearly defined podiums <p>The indicative scheme does not present a ‘sheer edge’ and is a ‘high level’ concept document only. It does not (and cannot) incorporate the fine grain design elements (such as balconies, fenestration, materiality + composition and architectural detailing) which contribute to the articulation and presentation of building facades. It is anticipated that the facades of the proposed development will be carefully designed and highly modelled to achieve</p>	<p>The Department supports the transition in heights and bulk between the intersection of Felton, Jenkins and Pennant Hills Road where the site interfaces with the higher height limits within the Carlingford Growth Precinct and the lower height limits to the west of the site where low density housing with a 9m height limit adjoins.</p> <p>The Departments Urban Design Team have reviewed the proposed height and FSR in the context of the potential bulk of the site and are comfortable that the height and FSR limits across the site will ensure elements like the through site link and public space will be provided in addition to building articulation, as the developer will not be able to take up the site cover in building form and still maximise the</p>

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	<p>Street – 49m built form along Pennant Hills Road and Felton Road does not related to low/midrise development to the west and south.</p>	<p>appropriate, visually engaging facades which contribute positively to the streetscapes.</p> <p>More specific articulation and / or facade design outcomes can be negotiated with Council through the preparation of a site specific DCP and / or during the DA process. Additionally, it is noted that the Design Excellence provisions of Parramatta LEP will apply.</p>	<p>height of building controls without these elements.</p>
	<p>Traffic and road network impacts</p> <p>Vehicle movement generated and connections proposed would impose unacceptable pressure on existing road capacity, lack of information around trip generation is provided. Site entry is inappropriately located on a narrow and congested road. The proposal does not consider 3J-1 of the ADG given the site’s proximity (400m) to a future Light Rail stop.</p>	<p>The vehicle access point proposed to serve the development are suitably located and will provide satisfactory sight distance along Felton Road.</p> <p>The very good Level of Service at the intersection of Felton Road and Baker Street will not change with the estimated additional traffic generation of the indicative development scheme.</p> <p>The additional traffic demand on the intersections of Felton Road and Baker Street, as a consequence of the indicative development scheme will only alter the Degree of Saturation and Total Average Delay minutely at each intersection.</p> <p>The indicative proposal traffic generation can easily be accommodated within the current road network. The road network has ample capacity for the proposal and an increase in residential component of the proposal, at this location could be expanded to 120 units or greater.</p>	<p>The proponents traffic consultant has referenced modelling of the surrounding road network and provided a comparison of intersection performance between the existing and projected traffic demands during the morning and evening peaks. The modelling indicates that there will be no change to the significant adverse impact on the surrounding road network and intersections as a result of the proposal.</p> <p>The proposed vehicular access is limited to Felton Road consistent with TfNSW requirements that restrict direct property access from classified roads (Pennant Hills Road). The proposed vehicular access via Felton Road is considered appropriate given the proximity of the site to a busy arterial road.</p> <p>The specific design and location of vehicular access to the site from Felton Road can be resolved through the site specific DCP.</p>

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			<p>The Planning Proposal demonstrates that impacts on the local road network and classified roads as a result of the proposed amendments to height and FSR are acceptable. The site is well located to maximise the use of public transport (bus and light rail) and to provide access to local services, retail and amenities within the Carlingford local centre.</p>
	<p>Through site link</p> <p>The through-site link is proposed to be a public asset (this is supported in principle, however details would need to be resolved as part of a Planning Agreement), however through the grading and proposed design it will likely be perceived as a private thoroughfare.</p> <p>Providing this link along the Western edge of the site will allow the opportunity for it to comprise a deep soil zone for more substantial landscaping that will assist with the transition from the proposed high density development to the adjacent two storey residential area. It is acknowledged that the inclusion of a through-site link was a direct result of</p>	<p>The proposed through site link has a width of 12m. Whilst it is currently designed to be pedestrian only - and to provide an enjoyable 'pedestrian journey' – future iterations of the link could accommodate a clear width of 3m to allow for service vehicles.</p> <p>There is a 2 metre fall between the Felton Road and Pennant Hills Road frontages of the development. There will need to be some grading to ensure connectivity between the streets.</p> <p>The current design for the through site link incorporates walkways of no more than 1:20 grade and incorporates a 'footpath' of a minimum of 1.5m in width along the western edge. This was specifically requested by Council Officers. Future iterations of the through site link could provide a less 'segmented' design, should this be desired.</p>	<p>Council's submission suggests that the proposed publicly accessible through site link be located along the western boundary of the site. The proponents proposal indicates the through site link would be located between taller buildings on the eastern part of the site and lower scale buildings on the western part of the site. While the Planning Proposal does not specifically define the location of the through site pedestrian connection, the location between buildings that could be built on the site is considered appropriate as it would:</p> <ul style="list-style-type: none"> • Provide an appropriate transition and separation distances between taller buildings and lower scale buildings within the site. • Enable better passive surveillance of the publicly accessible pedestrian link from dwellings and non-residential land uses within the site.

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	<p>previous consultation with CoP and the intention is supported. However, the proposed design is likely to create a space that is unclear to users as to its functionality and usability</p>	<p>In our opinion, the functionality and usability of the through site link, as currently designed, is appropriately clear.</p> <p>The link provides a clear sight line from Felton Road and Pennant Hills Road, and vis versa. The link:</p> <ul style="list-style-type: none"> • is of a generous width (12m), to appear inviting and safe, is designed (and will read as) a pedestrian zone and is designed to feel like a ‘street’ with dwelling (west) and commercial spaces (east) facing on to the link providing activation and passive surveillance. • incorporates landscaping at its edges, and within the link itself contributing to visual interest and urban amenity • incorporates movement spaces, and spaces for recreation and rest • is activated by multiple frontages and uses and appropriate materiality (such as that incorporated in ‘shared zones’) signage and lighting can be utilised to reinforce the ‘public’ nature of the link. <p>These elements can be incorporated into any future DA on the subject site. The through site link incorporated in the indicative scheme is a better outcome – in urban design terms – than the alternative link proposed by Council.</p>	<ul style="list-style-type: none"> • Enable appropriate landscaping to provide for the amenity of pedestrians and to assist with managing privacy for dwelling occupants. <p>The Department has no issue with the location of the through site link.</p>

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		<p>Council's alternative proposal situates the through site link along the western boundary and takes the form of a pedestrian path (3m) sitting in a 9m landscaped zone. Under Council's proposed alternative massing, there would be minimal opportunity for passive surveillance of the link as the proposed tower is separated from the link, substantial trees would be included between the link and the tower and the scale and fencing of neighbours prevents surveillance from their rear yards. Additionally, Council's proposed scheme provides very little building mass adjacent to the link. As such, there would also be limited opportunities for activation.</p>	
	<p>Heritage</p> <p>The site is located opposite local heritage item 128 within the Parramatta (former The Hills) LEP 2012, known as the K13 Submarine Memorial Reserve.</p> <p>The urban design statement states that the impact on K13 Submarine Memorial Park is minor, with some overshadowing occurring for one hour only and affecting a small portion of the site. Council considers that the overshadowing of this park has been underestimated and may have</p>	<p>The solar analysis included in the indicative scheme package has been prepared in accordance with Kennedy Associates standard procedures, utilising the inbuilt capabilities of our drafting software. The overshadowing has been 'modelled' not estimated.</p> <p>It is acknowledged that the site model (which includes the surface of K13 park) has been built using Nearmaps elevation data (and / or documents sourced from Council's DA tracker) for areas outside the site. Whilst this is considered an appropriate level of detail for a Planning Proposal, it is not as accurate as using survey data. It is therefore possible that the overshadowing of the</p>	<p>The Department notes that the K13 Submarine Memorial Park is located to the north-east of the site and the solar analysis undertaken by Kennedy Associates indicates that the park is unaffected by overshadowing from the proposal between the hours of 9am-2pm during the winter solstice. After this time there is likely to be shadow cast across the lower southern corner of the park.</p> <p>As the proposal is an indicative building form, it is considered that improved solar impact may be achieved through the design process for DA stage or as part of the site specific DCP process with Council.</p>

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	<p>additional impacts on the item and vegetation within the reserve.</p> <p>It is recommended that the building height or form be modified to reduce the impact on the heritage item and surrounding residences in-line with the Council officer alternative development scheme that will ensure impacts are minimised</p>	<p>park may be slightly more or slightly less than indicated in the current package.</p> <p>It is considered unlikely that more accurate data would reveal substantial change to the overshadowing of K13 Park .The majority of the park is located to the north-east of the subject site. That is, the extent to which any development on the subject site can overshadow the part is relatively limited.</p>	<p>The extent of overshadowing during the winter solstice is considered minor.</p>
	<p>Lack of sufficient deep soil and setbacks</p> <p>Minimum 6m setback (after TfNSW dedication) on Pennant Hills Road and 9m on western boundary to support trees with generous tree canopies to provide a buffer to residents from noise and air pollution. 15% of the site required to be deep soil which is not currently articulated within plans.</p> <p>It is recommended that all basement parking be contained within the building footprint to enable deep soil wherever possible. The extension of the basement to the boundary at the northern edge is not supported as it reduces the amount of deep soil to that</p>	<p>The indicative scheme incorporates 1709sqm of deep soil (29.6% of the site) of which 1542sqm (26.7%) achieves a minimum dimension of 6m.</p> <p>The communal open space located between the two parts of the ‘row’ building is co-located with deep soil.</p> <p>The basement outlined in the indicative scheme is contained within the building footprint, except at the Felton Street frontage. Specific basement outcomes can be negotiated with Council through the preparation of a site specific DCP and / or during the DA process.</p>	<p>Council’s submission raised issues in relation to building setback distances from Pennant Hills Road and Felton Road to provide for landscaping and sufficient space to achieve tree canopy. The planning proposal does not specifically address building setbacks, however the urban design documentation provided by the proponent indicates a minimum 6 metre setback from Pennant Hills Road (including from the land identified for road widening) and 4 metres from Felton Road. The minimum 6 metre setback from Pennant Hills Road is considered sufficient to accommodate planting of trees that could achieve a mature canopy spread of 6-8 metres, depending on the location within the setback that the tree is planted.</p> <p>The proponent’s Planning Proposal states that a requirement for a minimum 6 metre wide deep</p>

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	<p>boundary. Considering the site fronts onto the electricity transmission towers site to the north, a buffer of larger trees and native plantation is recommended, which a suitably sized deep soil area would help to achieve</p>		<p>soil zone along the entire Pennant Hills Road frontage will be included in the DCP. It is recommended that as part of the Finalisation of the proposal that the proposed local provision setting out matters to be addressed in the DCP include requirements for deep soil zones, building setbacks and tree planting along the Pennant Hills Road frontage to facilitate the establishment of canopy trees along the road frontage (excluding areas required for access to buildings and non-residential tenancies on this frontage).</p> <p>The minimum building setback in the indicative scheme submitted by the proponent to Felton Road is 4 metres. Further consideration of an appropriate building setback to allow for tree planting and landscaping on the Felton Road frontage can be addressed in the site specific DCP, as proposed to be required by the local provision to be inserted into the LEP.</p> <p>On balance, the Planning Proposal makes sufficient provision for open space, landscaping, tree planting and canopy cover. In the context of the local centre zoning that applies to the site, and which typically involves minimal or zero setbacks to public streets, the proposal is considered to provide a reasonable transition</p>

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			with sufficient space to achieve amenity and streetscape outcomes appropriate to the location of the site.
	<p>Strategic alignment with LSPS and District Plan</p> <p>Parramatta Council raised concern in relation to the lack of policy alignment in relation to its Local Strategic Planning Statement (LSPS), specifically because the site is outside areas in the Carlingford Precinct that are identified for additional density. Council also raised concerns with the scale of proposed building heights not being consistent with strategic planning directions for the area. Council's submission also states that the proposal is inconsistent with the District Plan outcome to deliver between 5-10% affordable housing.</p>	<p>The proponent's proposal notes that other affordable housing is being delivered nearby through a community housing provider (Baptistcare). The Planning Proposal offers other public benefits, and will contribute to housing affordability by increasing the range and supply in this location.</p>	<p>Council has indicated that the proposal is not consistent with the District Plan target of a range of 5-10% of new residential floorspace be affordable housing. The Department notes that the proposal does not specifically provide for affordable housing. Parramatta City Council's Affordable Rental Housing Policy 2019 states that affordable housing can be delivered in Parramatta in two ways:</p> <ul style="list-style-type: none"> • through funding or allocation of housing in a Planning Agreement; or • through inclusionary zoning under an affordable housing Scheme under SEPP 70 (now the Housing SEPP). <p>The proponent's proposal notes that substantial affordable housing is being delivered nearby through projects being delivered with community housing providers. The Planning Proposal includes other public benefits, and will contribute to housing affordability by increasing supply in appropriate locations.</p>

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Agency Submissions			
TfNSW	<p>Local Infrastructure contributions</p> <p>The site falls outside the Carlingford Growth Area however the Planning Proposal if approved would result in a similar built form outcome in very close proximity to the Carlingford Precinct. The planning proposal should provide contributions to the existing Contributions Plan or future SIC which is yet to be finalised according to the City of Parramatta Local Housing Strategy 2020.</p>	No response	The Department recommends that Council and the proponent revisit the previously submitted Letter of Offer to reach an agreed outcome for the site prior to finalisation.
	<p>Future Road widening</p> <p>Site is affected by SP2 infrastructure zone for road widening. No infrastructure to be located within TfNSW reservations. Portion of site required for future transport infrastructure are not to have any zone change.</p>	The applicant proposes to dedicate the southern portion of road widening across the site frontage to TFNSW to assist with expediting the road widening. The applicant has also offered to dedicate the eastern portion of the road widening on the basis that the site area from the 2 parcels of road widening can be used in the overall FSR calculation. RMS or TFNSW has already recommended to the applicant that the site area from the road widening can/should be used as part of the FSR calculation, which was a longstanding practice under previous planning instruments	The Department notes that the proponent's mapping excludes the road reservation from any changes which form part of this planning proposal.

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	<p>Access and carparking</p> <p>Access arrangements and site-specific DCP to consider carparking.</p> <p>Specifically, the following should be addressed:</p> <ul style="list-style-type: none"> existing road access point onto Pennant Hills Road should be removed and future access obtained via Felton Road. All vehicular movements for the development should be wholly within the site including for servicing and carparking. Maximum parking rates given the sites proximity to direct pedestrian access to Pennant Hills Road and public transport options. 	<p>No response received.</p>	<p>The Department supports inclusion of provisions which encompass carparking and vehicular access to the site as part of a site specific DCP. The issues raised in Council's submission can be adequately addressed through a site specific DCP.</p>
	<p>SEPP (Transport and Infrastructure) 2021 access</p> <p>Child care facilities</p>	<p>The child care centre component of the proposal is located on the first floor and is approximately 17m from the kerbside through travelling lane. Therefore the probability of an errant vehicle impacting on the child care centre is so remote that it should not be a consideration.</p>	<p>Proposed uses within the commercial area of the development are subject to assessment at development application stage and are not considered a determining factor for rezoning.</p>

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	<p>Traffic Modelling</p> <p>SIDRA modelling of nearby intersections, including the electronic SIDRA files and network output tables, should be provided to assess the impacts of additional vehicle trips on the surrounding road network. SIDRA files were not submitted as a part of this Planning Proposal and should be provided in the future.</p>	<p>Planning proposal results in an additional 200sqm of commercial floorspace and an increase in FSR with a potential further 32 apartments which is considered a modest increase.</p>	<p>The Department considers that further detailed modelling and provision of SIDRA file should be provided at DA stage.</p>
Endeavour Energy	<p>Easement Management</p> <p>Preference is for no activities to occur in easements and they must adhere to minimum safety requirements. The Planning Report does not appear to mention the easement for padmount substation no. 3764. Applicants will need to submit an appropriate application to Endeavour Energy's Easement Officer for assessment.</p>	<p>No response provided.</p>	<p>This matter can be addressed through appropriate conditions at DA stage.</p>
	<p>Network Connection</p> <p>To ensure an adequate connection, the applicant will need to engage an Accredited Service Provider (ASP) of an appropriate level and class of</p>	<p>No response provided.</p>	<p>This matter can be addressed through appropriate conditions at DA stage.</p>

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	accreditation to assess the electricity load and the proposed method of supply for the development.		
	<p>Power capacity</p> <p>An extension and / or augmentation of the existing local network may be required. Whilst padmount substation no. 3764 located on the site is likely to have some spare capacity, it is not unlimited and may not be sufficient to facilitate the proposed development. refer to Endeavour Energy's Mains Design Instruction MDI 0044 'Easements and Property Tenure Rights'.</p>	No response provided.	This matter can be addressed through appropriate conditions at DA stage.
	<p>Proximity of large trees</p> <p>The planting of large / deep rooted trees to near electricity infrastructure is opposed by Endeavour Energy.</p>	No response provided.	This matter can be addressed through appropriate conditions at DA stage.
	<p>Land use compatibility</p> <p>While no legislative restriction on the inclusion of sensitive uses such as schools, pre-schools, day / child care centres being placed next to electricity</p>	Above ground childcare centres are increasingly common and accepted, particularly in higher density developments or areas. With considered design, it is possible to achieve outcomes commensurate with 'traditional' at grade / standalone childcare centres Notwithstanding this, more specific 'use' outcomes	The merits of inclusion of a child care centre within the future development is a matter to be explored and demonstrated at DA stage.

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	infrastructure apply, prudent avoidance measures should however be implemented.	design outcomes can be negotiated with Council during the DA process	
Sydney Water	<p>Large servicing demands</p> <p>Engagement of a Water Servicing Coordinator required to investigate the servicing requirements, and lodgement of a feasibility application to Sydney Water prior to any development occurring.</p>	No response provided	The site is currently serviced by Sydney Water and future servicing capacity should be established and appropriately conditioned at DA stage.
	<p>Potable and wastewater services</p> <p>A detailed concept servicing proposal is required followed by an inception meeting with Sydney Water.</p>	No response provided	The site is currently serviced by Sydney Water and future servicing capacity should be established and appropriately conditioned at DA stage.
Transgrid	Adversely impacts the coverage and network connections for customers located on the telecommunications tower.	TransGrid does not specifically offer any technical assessment of the circumstance which the applicant can test through a suitably qualified expert. The tower is poorly located away from the ridge line of Pennant Hills Road and is an eyesore to the local community, being situated within a local street and beside a high school. Of note with the existing tower is that the existing facilities on the tower do not directly face the subject site and the tower element of the proposal but are installed and directed to the east and west of the site.	<p>The Departments assessment of this submission concludes that the main issue identified by Transgrid relates to the commercial contractual arrangements of their business.</p> <p>While it is acknowledged that there are numerous antennas on the Transgrid tower, it is considered that other solutions for the location of antennas are likely available to ensure business continuity from any external interruptions.</p>

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	<p>49m building height will impact on future antenna coverage for current occupants of the tower and will impact the community due to reduced levels of mobile coverage.</p>	<p>It is understood that the telecommunication network functions by relying on a series of overlapping zones. In the instance that a facility cannot provide coverage, then another nearby facility should be able to compensate. A similar tower is located within the grounds of Oatlands Golf Course and would provide coverage towards the southern side of the site.</p>	<p>No further information has been provided to validate the full extent of impact on the antennas affected by the proposal.</p>
	<p>Transgrid’s customers establish these telecommunications sites for 20 years at significant cost. Relocation by mobile carriers due to the development would impact them commercially and operationally with significant relocation cost.</p> <p>Customers include Federal Government agencies.</p> <p>Transgrid’s customers may not be able to easy find replacement sites for coverage resulting in lapsing mobile coverage. This would adversely impact relationships with customers and meeting contractual obligations.</p>	<p>Advances in technology are less reliant on the antiquated infrastructure which exists in Felton Road. No mention has been made of this or any alternate solution being forwarded by TransGrid.</p> <p>As a commercial consideration, I am sure that an engineering solution exists and a negotiation with the applicant may resolve and possibly improve the coverage TransGrid is looking to secure.</p> <p>The applicant is willing to meet with TransGrid post determination of the planning proposal and work through the matter should it assist.</p>	<p>It is noted that that the proponent has expressed a willingness to look at potential solutions to Transgrid’s concerns which may potentially take advantage of the increased tower heights. This matter is beyond the scope of this proposal and would rely on negotiations between Transgrid and the developer.</p>

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Community Submission			
1.	<p>Supports:</p> <p>Pedestrian thoroughfare through the site between Felton and Pennant Hills Road.</p> <p>Bulk away from the western boundary of the site</p> <p>Inclusion of similar amount of commercial space</p> <p>Larger room sizes within the apartments</p>	No response provided	Noted
	<p>Objects to internal air quality and noise:</p> <p>Lack of ventilation with use of enclosed balconies</p> <p>Impact of pollution and noise on occupants of building</p>	No response provided	Any future development of this site will require acceptable compliance with SEPP 65.
2.	<p>Height</p> <p>Out of character and should have a maximum of 17m</p>	Refer to Council’s submission response to height.	Refer to Council’s submission response to height.

Land use suitability

Above ground childcare centres are increasingly common and accepted, particularly in higher density developments or areas.

With considered design, it is possible to achieve outcomes commensurate with 'traditional' at grade / standalone childcare centres. Notwithstanding this, more specific 'use' outcomes design outcomes can be negotiated with Council during the DA process.

In terms of permissibility, the proposed land use is currently permissible in the zone.

Notwithstanding this, it is understood that the City of Parramatta is currently in the process of 'harmonising' the LEPs which apply to its LGA. Once this process is complete, it is understood that Residential Flat Buildings and Multi Dwelling Housing will not be permissible in the B2 Zone, as is the case in Parramatta Local Environmental Plan 2011, which already applies to most of the LGA.

To address this, the indicative scheme (or any future DA on the site) could be amended to provide 'shop top housing' in the proposed 3 storey 'row' building. In our opinion this use has the potential to be beneficial to the development, further activating the proposed through site link.

A number of submissions raise issues with the land uses proposed for the site, specifically in relation to proximity to an electricity substation (to the north) and Pennant Hills Road (to the south-east). Concerns with electric and magnetic fields, noise and air pollution are flagged as considerations in relation to the suitability of residential development and uses like child care centres.

The issues raised in submissions relate to specific development outcomes that would be possible under the proposed planning controls that would apply to the site if the Planning Proposal is finalised. The Planning Proposal does not propose any change to land use zoning or to the permissible land uses on the site.

The issues raised in relation to proximity of sensitive receivers to sources of air and noise pollution, and electric and magnetic fields (including implementing prudent avoidance approaches) are appropriately addressed as part of the assessment of development applications that could arise following the finalisation of the Planning Proposal.

There are appropriate provisions in place relating to the consideration of amenity impacts for residential development and other noise and air quality sensitive land uses adjacent to busy roads under SEPP (Infrastructure), SEPP 65 and related guidance documents. There is

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			<p>no need for site specific provisions to address this issue.</p> <p>It is noted that the proponent proposes to commit to the delivery of a 90 space child care centre through a local Planning Agreement. However, the Planning Proposal does not include a specific commitment to enter into a Planning Agreement with Council. It is also noted that the child care centre is proposed to be privately operated. Issues relating to the design of the child care centre are able to be addressed through the assessment of any development application that proposes this land use. The potential amenity, health and safety issues related to such a proposal are not within the scope of consideration in finalising the Planning Proposal.</p>
3	<p>Energy efficiency and sustainability</p> <p>Issues in relation to sustainability and energy efficiency raised, suggesting that standards exceeding the current BASIX requirements should be achieved</p>	<p>The indicative scheme is a ‘high level’ concept document only. It does not (and cannot) incorporate the fine grain design elements (BASIX measures, materiality, energy generation, WSUD etc.) which contribute to the Environmental Sustainability of developments. Specific ESD outcomes can (and should) be negotiated with Council through the preparation of a site specific DCP and / or during the DA process.</p>	<p>The BASIX SEPP prevents a planning instrument from requiring energy efficiency or other environmental performance standards that exceed the standards in the BASIX SEPP. No change to the Planning Proposal is required to address this issue.</p>

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	<p>Traffic</p> <p>Felton Road already extremely busy during school drop off and pick up times being used by James Ruse High and Carlingford West Public School.</p> <p>Traffic report indicates that there will only be an additional 8 trips from the development therefore they should use Pennant Hills Road. No access should be allowed from Felton Road.</p>	<p>Refer to response above under Traffic and Road Network Impacts.</p>	<p>The traffic impact on the surrounding road network have been adequately addressed by the proponents Traffic Impact Assessment.</p>
	<p>Parking</p> <p>No parking numbers provided for development. Provision for 3 cars per unit should be made to ensure on-street parking isn't compromised or traffic flow within Felton Road.</p>	<p>No specific response provided to parking rates.</p>	<p>The proposal provides an indicative basement parking layout only. Specific parking provision will be determined as part of the DA process. It is recommended that the site-specific DCP include a provision for parking rates.</p>
	<p>Traffic Lights</p> <p>Installation of traffic lights at Baker Street and Pennant Hills Road will still create significant impacts on traffic flow as Baker Street is mostly one lane. Baker Street should be widened and an additional lane between Felton Road and Pennant Hills Road provided.</p>	<p>The proponents traffic report indicates that traffic signals are to be installed as part of the Baptistcare development on the opposite side of Pennant Hills Road at the intersection of Pennant Hills Road and Baker Street.</p>	<p>There are no new traffic signals proposed as part of this proposal.</p>

Summary of Submissions

PP-2022-376



Submission Name	Issues Raised	Proponent Response	Department Response
	<p>Capacity of schools</p> <p>Questions whether the capacity of schools in the local area to accommodate additional students resulting from the development has been considered</p>	<p>No response provided specifically in response to additional school capacity.</p>	<p>A Social Infrastructure Assessment was prepared on behalf of the proponent by EMM. The Social Infrastructure Assessment considered the capacity of existing schools in the local area, and demand for community facilities as a result of the Planning Proposal. The Social Infrastructure Assessment does not specifically address additional demand for schools as a result of the Planning Proposal. It is noted that no submission was received from the NSW Department of Education. In the context of overall population growth planned in the area, the Planning Proposal would result in minimal additional demand for schools.</p> <p>The issue of school capacity to accommodate planned growth is best addressed at a precinct-wide scale so that cumulative changes in demographics and population growth are considered relative to school capacity. The Department of Education takes this approach when planning for the capacity of the public school system.</p> <p>No change to the Planning Proposal is required by the Department to address this issue.</p>