



**CITY OF
PARRAMATTA**

Parramatta City Centre Local Infrastructure Contributions Plan (Amendment No 1)

Summary of Submissions
May 2023



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Document Control

Version	Date	Comments
1	24/04/2023	Document as reported to Council on 22 May 2023

1. Executive Summary

This document sets out matters raised in submissions to the exhibition of the draft Parramatta City Centre Local Infrastructure Contributions Plan 2022 (Amendment No 1) (the "Contributions Plan") between 27 March and 28 April 2023; and the Council officer's response to the matters raised in the submission.

Submissions in this document are set out based on method of receipt, being:

- on-line form submissions lodged through the Participate Parramatta portal, with 5 submissions received (Section 2);
- submissions received by e-mail, with 1 submission received after the closing date (Section 3); or
- other method such as mail, with no submissions received (Section 4).

In summary, the sentiment of submissions received are set in the following table:

Sentiment	# Submissions
Support	3
Support in Part	1
Do not support	2

Table 1 - Sentiment of submissions received

Of the submissions received, none of the matters raised have resulted in recommendations to amend the contributions plan as exhibited.

2. On-line form submissions

This section sets out on-line form submissions received through the **Participate Parramatta** portal.

A total of **5 submissions** were lodged through this service.

Submission No	Summary of submission	Council officer response
01	Support in part – Submitter questions why there is a reduced rate for some parts of the City Centre? Considers that all development in the Parramatta CBD should have same percentage rate. The submitter does not support 4%, rather the contribution rate it should be 5% for all development or 4.5% for all, no variation within CBD area.	<p>Different rates were informed by the following:</p> <ul style="list-style-type: none">• Development feasibility, or• Whether or not the land had an increase in development potential <p>The independent development feasibility assessment commissioned by Council and carried out in June and August 2021 advised that a rate of 5% for residential or mixed-use development that included residential development; and a rate of 4% for other development would be viable. Applying a rate of 4.5% for non-residential development would not have been viable based on that analysis. Consequently, the differential percentage rates were applied. These rates were not subject to change through this amendment.</p> <p>No amendment to the draft contributions plan is recommended from this submission.</p>
02	Support – Submitter makes a comment that the amendment to the contribution plan provides consistency with appropriate proportions for areas of high development and considers that the ultimate result is fair and provides for future services that will be increasing in demand as the number of residents and workers in the area balloon.	<p>Support noted.</p> <p>No amendment to the draft contributions plan is recommended from this submission.</p>

Submission No	Summary of submission	Council officer response
03	Support - Submitter considers the exhibition documentation should have included an explanation as to why the Phillip Street Block was part of AREA A previously.	<p>Support noted.</p> <p>The land was originally included within "Area A" due to changes made by the Department of Planning and Environment in finalising the Parramatta CBD Planning Proposal that, as an interim solution, re-applied the existing planning controls under Parramatta Local Environmental Plan 2011. The further changes coming into effect on 30 June 2023 increase the development potential in the area and therefore warrant reinstatement of the increased percentage rates originally mooted in the contributions plan back in October 2021.</p> <p>This above explanation for the land within the Phillip Street block being part of Area A was included in the exhibition documentation.</p> <p>No amendment to the draft contributions plan is recommended from this submission.</p>
04	Do not support – Submitter makes a comment that there should be no more high-rise development in Parramatta, as it does not retain the heritage atmosphere.	<p>The contributions plan cannot change or apply planning controls such as height or density. It intends to assist in funding local infrastructure necessary to support the growth within the City Centre – such as improvements to the public domain, streets, pedestrian amenity, open space, amongst other matters. The matters raised in this submission are beyond the scope for the contributions plan to consider.</p> <p>No amendment to the draft contributions plan is recommended from this submission.</p>
05	Support [no explanatory text provided]	<p>Support noted.</p> <p>No amendment to the draft contributions plan is recommended from this submission.</p>

3. E-mail submissions

This section sets out submissions received by e-mail.

A total of **1 submission** was lodged by e-mail.

Submission No	Summary of submission	Council officer response
06	<p>Do not support – Submitter stated that there should be a nexus between the increased development potential from the CBD planning controls and the increased contribution. It refers to the intention of Council to apply Area A to land that did not receive some form of increase in development yield under the CBD Planning Proposal.</p> <p>Submitter contends that not all land within the Phillip Street block will benefit from the proposed change to planning controls [under SEPP 2] and that isolated or small sites will receive no uplift.</p> <p>Submitter recommended that the contributions plan is improved to create equity by establishing a nexus between increased contribution rates and increased development outcome.</p>	<p>Objection noted. Application of Section 7.12 contributions under the Act are not required to demonstrate a nexus (or direct connection) between the development outcome itself and the need to fund local infrastructure by imposing a condition of consent on that development (per Section 7.12(4)).</p> <p>The <i>relationship</i> between an increase in development potential for the Phillip Street block, which warrants application of the increased s7.12 levies <i>has</i> been established by the new controls of SEPP 2. Whether or not an individual site can take advantage of the revised controls is an irrelevant consideration for s7.12 contributions.</p> <p>It should be noted that the Phillip Street block was originally identified for inclusion of the increased contributions rates along with the entire City Centre. It is only because of changes made by the Department in finalising the Parramatta CBD Planning Proposal that the Phillip Street block retained their existing controls as an interim position, pending the further work that resulted in the new controls under SEPP 2. Those changes were published on the Legislation website on 16 December 2022 and come into effect on 30 June 2023.</p> <p>As the controls enabled under SEPP 2 represent an increase in development potential for land within the Phillip Street block, compared to the former controls applying to the land under the predecessor Parramatta Local Environmental Plan 2011, the</p>

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		<p>Principle cited by the submitter where the increased s7.12 levies should only apply where there is an increase in development potential – in this case by the controls enabled under SEPP 2 – has been demonstrated; and application of the increased levies is therefore warranted.</p> <p>No amendment to the draft contributions plan is recommended from this submission.</p>

4. Other submissions

This section sets out submissions received by other methods, such as mailed to Council.

A total of 0 submissions were lodged by other methods.