

Parkes 88 Pty Ltd

ACN 826 484 407

Po Box 4081 Strathfield South NSW 2136

Tel: 02 8076 5510

3rdth November 2022

Bryan Hynes

A/Chief Executive Officer

City of Parramatta NSW 2124

Attention: Strategic Planning & Rates Department

Dear Bryan,

Request to amend the Parramatta Suburb Boundary pursuant to the Geographical Names Act, 1966.

This letter and those attached from affected property owners seeks Council's support to amend the Parramatta suburb boundary to include properties north of Parkes Street, as outlined in Figure 2 below. Figures 1 & 3 in this letter show the current suburb boundaries for Parramatta and Harris Park, respectively. Figures 2 and 4 show the proposed boundary. We would like to add that in addition to the previous application addressing the same topic, we now have the overwhelming support of property owners who are affected by this change. Their letters of support are attached.

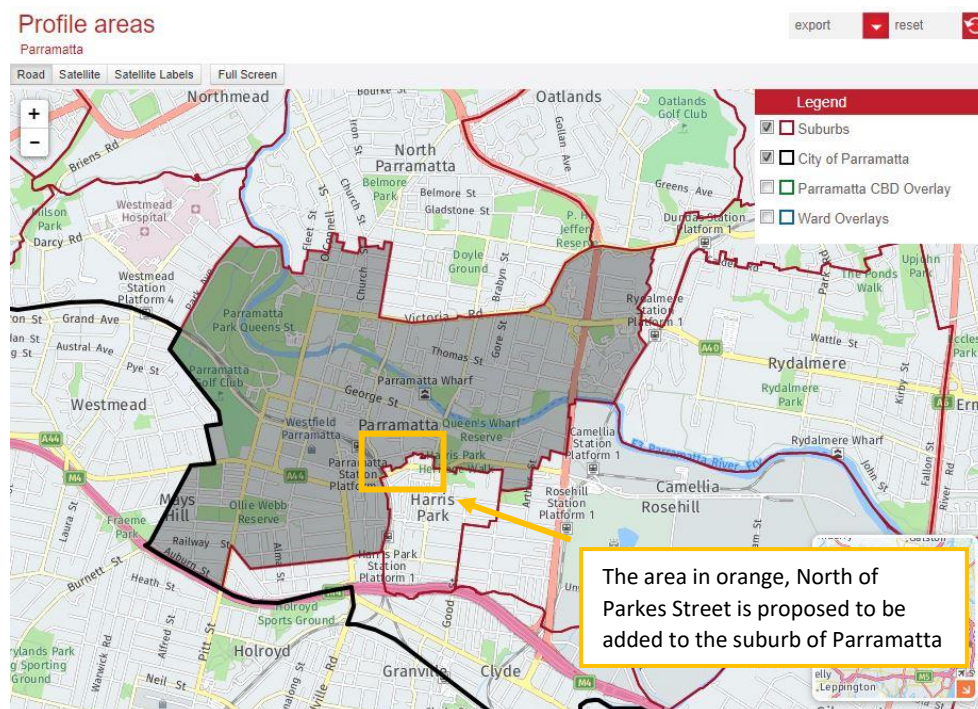


Figure 1: Current Parramatta Suburb Boundary sourced from Profile ID website, July 2022

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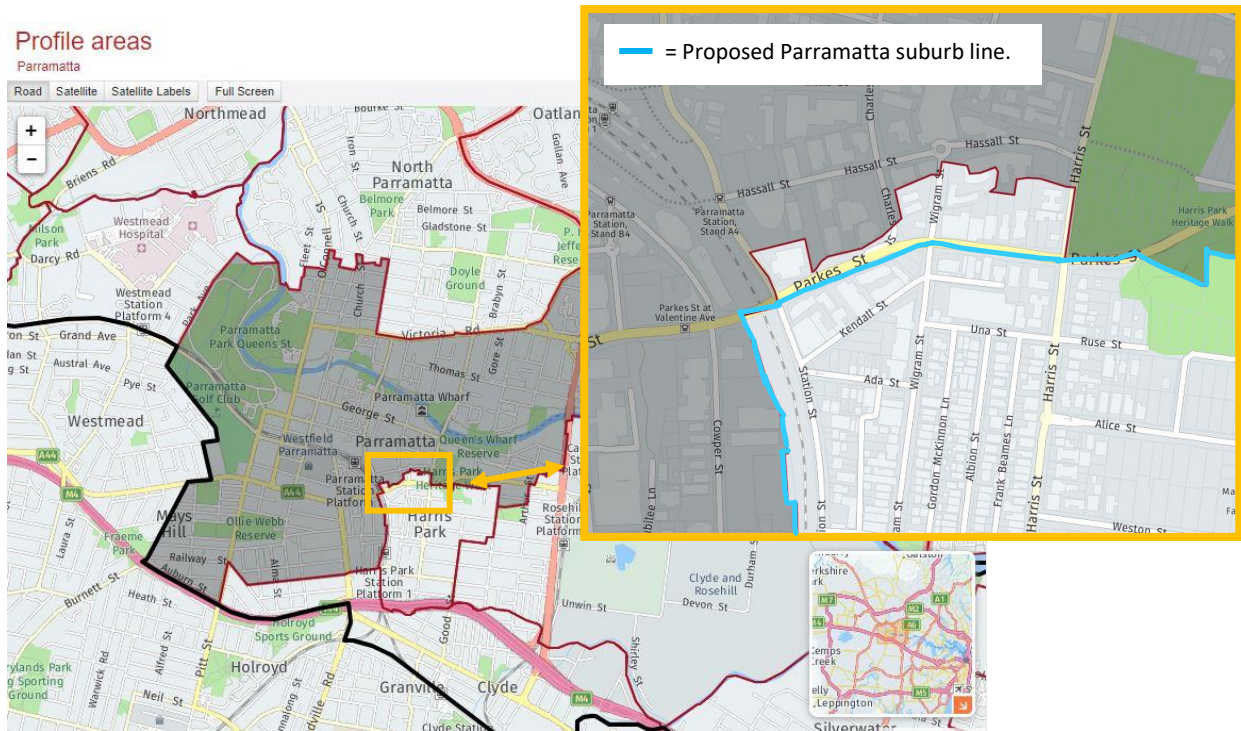


Figure 2: Proposed Parramatta Suburb Boundary denoted in blue running east west along Parkes Street

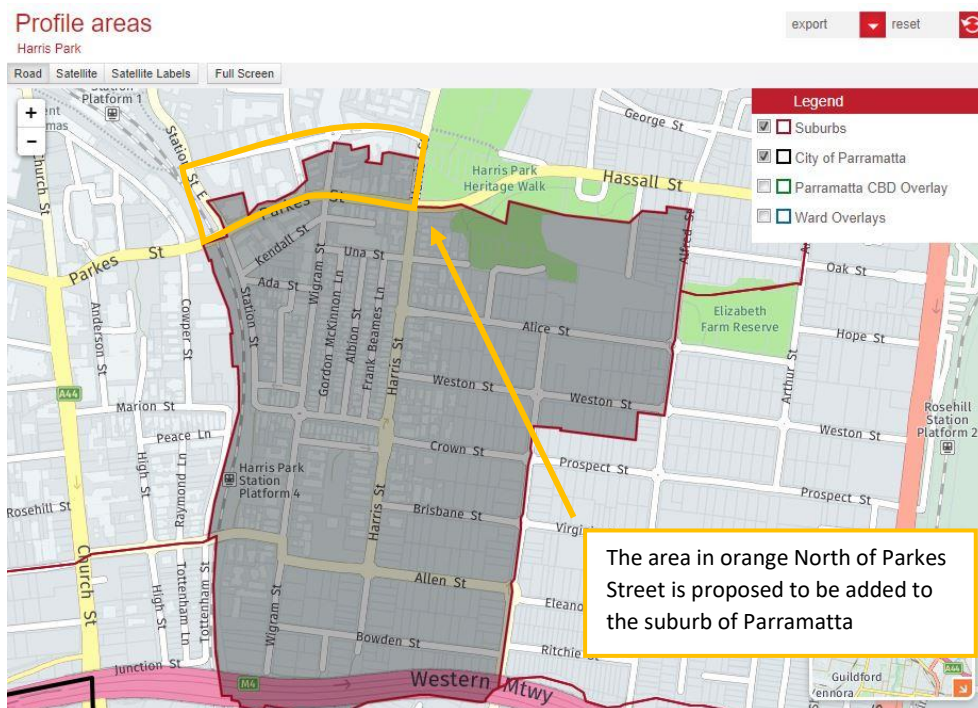


Figure 3: Current Harris Park Suburb Boundary sourced from Profile ID website, July 2022

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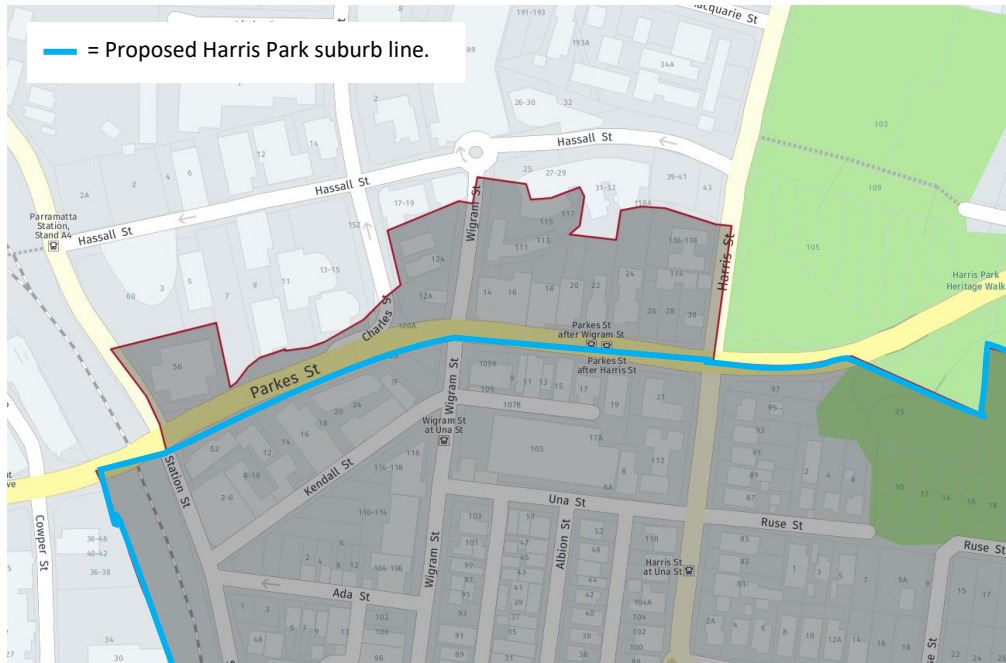


Figure 4: Proposed Harris Park Suburb Boundary running east west along Parkes Street.

Justification for Suburb Change

Parkes 88 Pty Ltd makes this application with reference to the Geographical Names Board's NSW Address Policy and User Manual (May 2021) which references those in the development domain as data producers, exercising our right and responsibility to address this core address component for our new development and maintain the awareness of the applicable standards and guidelines set out in the manual. We also act on behalf of the **overwhelming majority** of several other land owners affected by this decision who have shown their support for the change with their letters attached in the Appendix.

NSW Address Policy and User Manual – May 2021 – Published by the Geographical Names Board

After review of the above-mentioned manual, we note the following points that support the proposal:

6.8.5 Boundary Determination (pg.104)

- a. Address locality boundaries should be determined as early in the planning process as possible.*

Response: As the Parramatta CBD Planning Proposal has recently come into affect, we see this as favourable timing to address this boundary issue so that the two run in perpetuity by years end. Furthermore there are a number of neighbouring sites under construction or working through planning proposals, therefore it is beneficial to address this item now rather than waiting till approvals and construction is complete and titles are registered. The fact that these land owners support this application identifies that they too think the timing is more critical than ever.

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b. Address locality boundaries shall follow clear and easily distinguishable lines such as rivers, railways, major road centrelines.

Response: For the most part, Harris Park is bounded by roads or infrastructure to the south (M4), east (Good & Alfred Streets) and west (Parramatta Rail Line and Tottenham Street) refer to Figure 3, page 2. The northern boundary line however follows a less distinguishable path, traversing several property boundaries including Hambledon Cottage Museum, which is in the suburb of Parramatta.

The northern boundary line does not follow a road, railway or river. Clay Cliff Creek line is in proximity to the boundary line however the boundary does not appear to follow this creek line.

Based on available information. It is not clear why the existing Parramatta boundary line does not logically continue west along Parkes Street before turning south along the railway line.

It is our view that the boundary line ought to be amended to follow the centre of Parkes Street, from Harris Street extending west to the railway line. We believe this would be more logical, distinguishable and consistent with the remainder of the suburb as well as the intent of the Parramatta CBD planning proposal.

d. Boundaries should be regularly reviewed, especially in areas subject to urban development. The review process should take into primary consideration impacts on community interests. Following this, consideration can be given to the likely impact on government and commercial interests.

Response: The new Parramatta CBD Planning Proposal has been supported by state government. The timeline of this Planning Proposal implementation provides an appropriate opportunity to review how these changes impact the community and to make amendments that better reflect what is happening in the CBD today and in the future especially with the projected urban development that will occur from 38,000 new homes and around 66,000 new jobs.

We recognise and agree with David Hewetson's (*Project officer, Parramatta City Council*) comments in an email to Cameron Byrne (ALAND) dated 24.9.2020 that the "The CBD Planning Proposal does not intend to, and cannot make changes to, suburb boundaries or names", this is inline with GNB's NSW Address Policy and User Manual. The point we would like to make is that as the Department of Planning and Environment regularly includes the particular area of Harris Park under review within the Parramatta CBD and has it zoned for high density we would like to have the boundary reviewed and adjusted to reflect this as we see it as part of the evolving area of Parramatta and within the immediate communities interests. The extent of the Harris Park suburb that is included in the planning proposal can be seen below in Figure 5 and is outlined in red.

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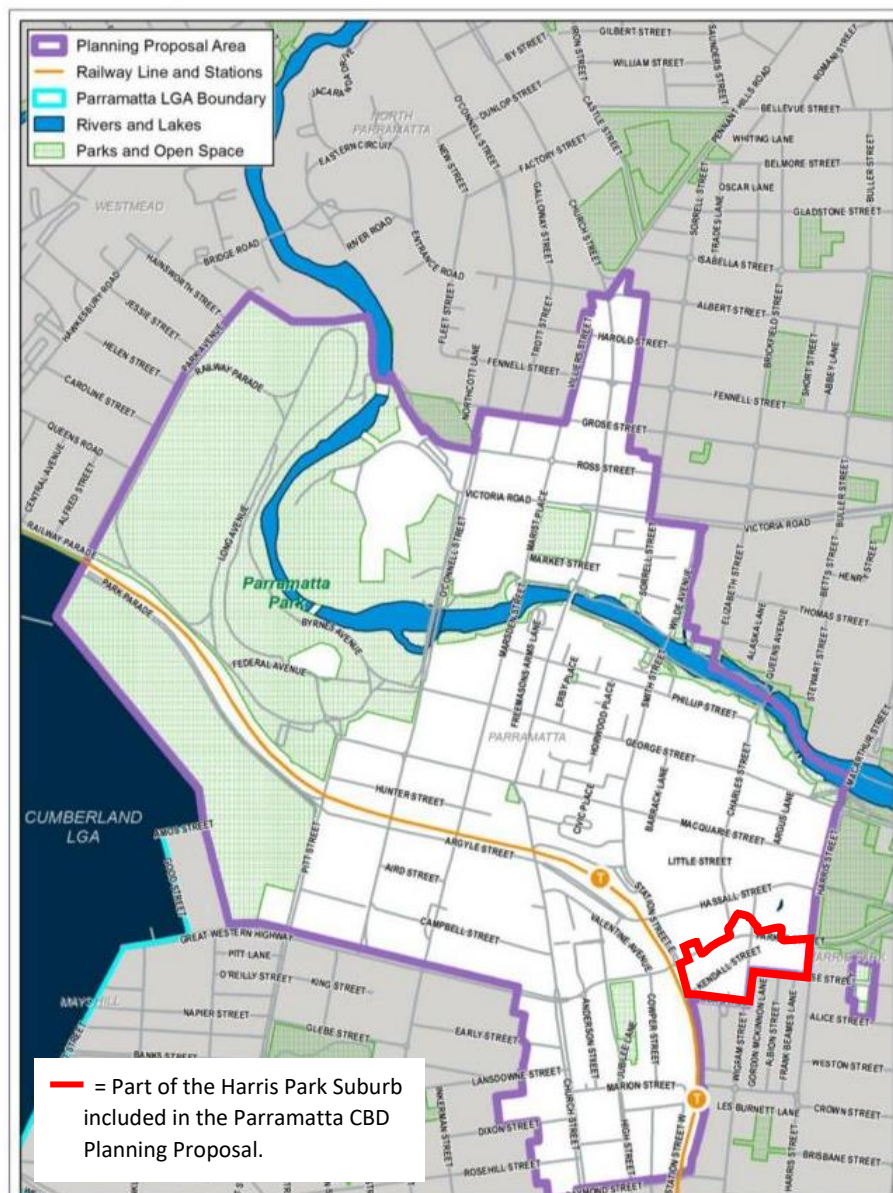


Figure 5: The area highlighted yellow belongs to the suburb of Harris Park and is including in the Parramatta CBD Planning Proposal.

e. Address localities should be reflected in the address of any given site. A boundary adjustment may be required if the address locality of the access point to a site is not concurrent with the address locality for the site being addressed.

Response: As discussed above, the subject sites in Harris Park are shown by DPIE as being within the Parramatta CBD Planning Proposal. Consistent with the GNB NSW Address Policy and User Manual, boundary lines should be regularly reviewed especially where planning control amendments and associated community interests are considered over time and where existing boundaries appear illogical/outdated. It would appear that since the Department of Planning and Environment highlight this area as part of the new Central Business District, the suburb boundary should also be adjusted to align with this vision.

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9.1.3 Address Locality Issues

Boundary Creep

Description: Often in cases of urban greenfield growth, or where the name of a neighbouring address locality is perceived as 'more prestigious' it will be used by residents or businesses to identify the location of their address. This is often also employed by real estate agents when marketing a property. This causes problems for official recognition of the authoritative address.

Policy: It is recognised that with changing demographics in various areas there will be ongoing need to redefine address locality boundaries to suit popular usage. Where regular, consistent and non-conflicting use of a address locality name is identified beyond the original boundaries assigned, consideration should be given by the Local Government and GNB to changing the boundaries for the address locality.

Response: As stated on the Department of Planning and Environment website 'more than 38,000 new homes and around 66,000 new jobs are on their way for Parramatta' as a result of the new Parramatta CBD Planning Proposal. Due to this evolving demographic, we believe it to be suitable to redefine the suburb boundaries of Parramatta, as confirmed in the above policy the addresses in Harris Park that we are looking to relocate into the Parramatta suburb have been consistently used by the Department of Planning as being part of the Parramatta Central Business District.

Further to this as active members in the immediate community and having made contact with future residents of our site and existing residents of others, many local residents, agents and managers often refer to their addresses as 'Parramatta' therefore it is logical to adjust the boundary perimeter to include such properties.

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Overwhelming Support

As per the NSW Address Policy and User Manual's 7.1.1 Submitting a request section, any proposal shall include sufficient information to demonstrate that an overwhelming majority of the community who will be affected by the proposal are in support of the change. Below is a table that clarifies which affected landowners are supportive of the suburb change, whilst Figure 6 indicates their locality on the map.

Green indicates supportive	Orange indicates not supportive	Grey indicates lots with no owner data that don't include a building.	White indicates no response received.
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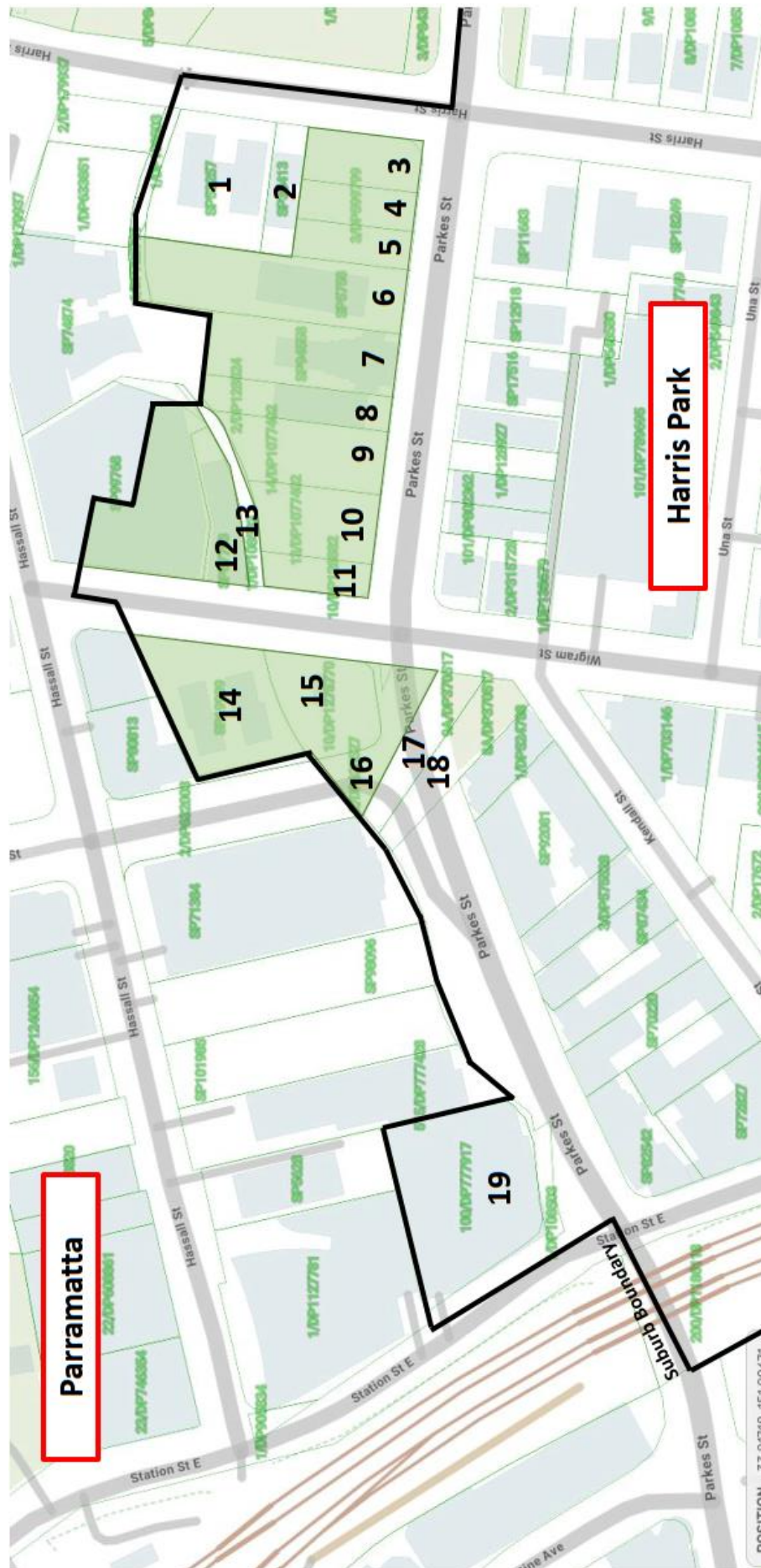
Map ID	Address	Lot/DP number	Owner Information	Lot Size (sqm)	Comments
1	116 Harris Street	CP/SP53257	Marina Margaret Vidler; Stephen Keith Vidler	1413 sqm	Caydon Property Group in liquidation. No response received.
2	114 Harris St	CP/SP35413	The proprietors of SP35413	413 sqm	Caydon Property Group in liquidation. No response received.
3	30 Parkes St	CP/SP16744	Parkes St NSW Pty Ltd	598 sqm	Supportive.
4	28 Parkes St	1/DP599236	Parkes St NSW Pty Ltd	455 sqm	Supportive.
5	26 Parkes St	1/DP599236	Parkes St NSW Pty Ltd	446 sqm	Supportive.
6	24 Parkes St	CP/SP5758	Body Corporate	1656 sqm	Supportive.
7	22 Parkes St	CP/SP94558	Body Corporate	1190 sqm	Supportive.
8	20 Parkes St	2/DP128524	Parkes 88 Pty Ltd	648 sqm	Supportive
9	18 Parkes St	14/DP1077402	Parkes 88 Pty Ltd	970 sqm	
10	16 Parkes St	13/DP1077402	Parkes 88 Pty Ltd	839 sqm	
11	14 Parkes St	10/DP128882	Parkes 88 Pty Ltd	374 sqm	
12	111 Wigram St	CP/SP87783	Wigram St Pty Ltd	502 sqm	Supportive.
13	Unknown	1/DP108503	No ownership info	694 sqm	Clay Cliff Creek – presumed to be Sydney Water asset.
14	124 Wigram St	CP/SP19939	Charles St Nominees Pty Ltd	1473 sqm	Supportive.
15	12A Parkes St	10/DP1275770	SOHO (Parramatta) Pty Ltd	910 sqm	Supportive.
16	120A Wigram St	2/DP623527			Supportive.
17	118 Wigram St	9A/DP370517	No ownership info	584 sqm	Land under Charles and Parkes St – presumed to be Transport NSW asset.
18	28 Kendall St	8A/DP370517	No ownership info	721 sqm	Land under Charles and Parkes St – presumed to be Transport NSW asset.
19	56 Station St	100/777917	Yangdo Service Pty Ltd	2197 sqm	No response received – owner is currently overseas.
TOTAL		Total lots of properties who provided no response		3 Lots	
		Total lots of owners supportive		13 Lots	
		Total lots of owners unsupportive		0 Lots	
		Total lots of land with no data or owner information.		3 Lots	

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Figure 6 shows each of the properties affected and supportive of the suburb re-alignment



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Conclusion

Parkes 88 Pty Ltd submits this letter seeking Council's support to include land shown in Figure 3 as being in the suburb of Parramatta and not Harris Park. Consistent with the Geographical Names Board NSW Address Policy and User Manual, boundary lines should be regularly reviewed especially where planning control amendments and associated community interests are considered over time and where existing boundaries appear illogical/outdated.

It is our view that the boundary line ought to be amended to follow the centre of Parkes Street, from Harris Street extending west to the railway line. We believe this would be more logical, distinguishable and consistent with the remainder of the suburb as well as the intent of the Parramatta CBD planning proposal. We note this request is backed by the 'overwhelming majority' of the community who will be affected and all matters raised are in line with the abovementioned policy. Furthermore, as the boundary amendment proposal will affect between 10 to 20 parcels or owners/occupiers, the GNB Secretariat can seek permission from the GNB to alter the boundaries without advertising.

Parkes 88 respectfully requests a written response acknowledging a receipt of this request within the noted timeframe as well as the implementation of an action plan as per the NSW Address Policy and User Manual. Should you have any questions in relation to the above, please do not hesitate to contact me at ryan@aland.com.au or 0436 125 762.

Yours sincerely,

Ryan Lane
Head of Development
ALAND
ryan@aland.com.au

Parkes Street NSW Pty Limited as Trustee for the
Parkes Street NSW Unit Trust
ABN 27 424 352 687

Phone +61 2 9647 1972
101/38 Egerton Street,
SILVERWATER NSW 2128

12 August 2022

Brett Newman
Chief Executive Officer
Parramatta NSW 2124

Dear Sir

BOUNDARY CHANGE REQUEST – HARRIS PARK TO PARRAMATTA | PARKES 88 PTY LTD | LETTER OF SUPPORT

I am the registered owner / Director of 26,28 and 30 Parkes Street Harris Park.

This letter outlines our support of the submission by Parkes 88 Pty Ltd to request a change to the boundary north of Parkes Street from Harris Park to Parramatta.

The request affects my property and I support the amendment to the suburb name on the same grounds set out in the submissions.

We consider the change to the boundary will be in the best interests of the community and residents in the area. It will undoubtedly add value and in interest to landscape of the City of Parramatta.

I respectfully request that my support for the request sought be given due consideration by Council during their determination

Yours Sincerely,

David Kert


DIRECTOR

Parkes Street NSW Pty Limited as Trustee for the
Parkes Street NSW Unit Trust
ABN 27 424 352 687
Phone +61 2 9647 1972
101/38 Egerton Street,
SILVERWATER NSW 2128



SH Parkes International Pty Ltd

PO Box 229 Eastwood NSW 2122

Suite 3, Level 2, 2 Rowe St Eastwood, NSW 2122

P +612 8893 8899 **F** +612 8893 8833

ABN 90 330 993 693

Brett Newman
Chief Executive Officer
Parramatta NSW 2124

Dear Sir

BOUNDARY CHANGE REQUEST – HARRIS PARK TO PARRAMATTA | PARKES 88 PTY LTD | LETTER OF SUPPORT

I am the registered owner/ director of 24 Parkes St, Harris Park.

This letter outlines our support of the submission by Parkes 88 Pty Ltd to request a change to the boundary north of Parkes Street from Harris Park to Parramatta.

The request affects my property and I support the amendment to the suburb name on the same grounds set out in the submissions.

We consider the change to the boundary will be in the best interests of the community and residents in the area. It will undoubtedly add value and in interest to landscape of the City of Parramatta.

I respectfully request that my support for the request sought be given due consideration by Council during their determination.

Yours sincerely,



Director

Rustom Kudinar-Kwee

01/09/2022

Brett Newman
Chief Executive Officer
Parramatta NSW 2124

Dear Sir

BOUNDARY CHANGE REQUEST – SP 94558 22 PARKS ST, HARRIS PARK TO PARRAMATTA | PARKES 88 PTY LTD | LETTER OF SUPPORT

I am the Strata Managing Agent acting on behalf of SP 94558 of 22 Parks ST, Harris Park NSW 2150.

This letter outlines the Owners Corporation support of the submission by Parkes 88 Pty Ltd to request a change to the boundary north of Parkes Street from Harris Park to Parramatta.

The request affects SP 94558 and the Owners Corporation support the amendment to the suburb name on the same grounds set out in the submissions.

The Owners Corporation consider the change to the boundary will be in the best interests of the community and residents in the area. It will undoubtedly add value and in interest to landscape of the City of Parramatta.

I respectfully request that the support of SP 94558 of 22 Parks ST, Harris Park NSW 2150 Owners Corporation for the request sought be given due consideration by Council during their determination.

Yours sincerely,



David Varvian
Head of Strata Services
Licensed Strata Manager
(02) 9556 1022
david@psmgstrata.com.au | psmgstrata.com.au
P. O. Box 837, Rockdale NSW 2216



23rd August 2022

Brett Newman
Chief Executive Officer
Parramatta NSW 2124

Dear Sir

**Re: BOUNDARY CHANGE REQUEST – HARRIS PARK TO PARRAMATTA | PARKES 88 PTY LTD
LETTER OF SUPPORT**

I am the Strata Manager of 111 WIGRAM STREET, HARRIS PARK being Strata Plan 87783.

This letter outlines the Owners Corporations support of the submission by Parkes 88 Pty Ltd to request a change to the boundary north of Parkes Street from Harris Park to Parramatta.

The request affects 111 Wigram Street, Harris Park and the owners support the amendment to the suburb name on the same grounds set out in the submissions.

We consider the change to the boundary will be in the best interests of the community and residents in the area. It will undoubtedly add value and in interest to landscape of the City of Parramatta.

I respectfully request that Owners Corporation support for the request sought be given due consideration by Council during their determination.

Yours sincerely,
Netstrata of Behalf of 111 WIGRAM STREET, HARRIS PARK
EVANGELINE TIGHE
Strata Manager
evangeline.tighe@netstrata.com.au

Liability Limited by a scheme approved under Professional Standards Legislation

Network Strata Services Pty Ltd | A.C.N. 064 030 324 | All correspondence: PO Box 265, Hurstville BC NSW 1481

Head Office

298 Railway Pde
Carlton NSW 2218

Parramatta Office

Level 14, 3 Parramatta Sq
Parramatta NSW 2150

Wollongong Office

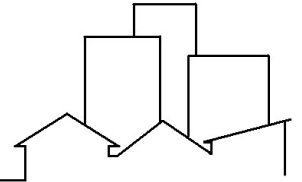
Level 3, 3 Rawson St
Wollongong NSW 2500

Sydney CBD Sales Office

Level 26, 44 Market St
Sydney NSW 2000

CHARLES ST NOMINEES PTY LTD

ACN: 637 970 579



26th August 2022

Brett Newman
Chief Executive Officer
Parramatta NSW 2124

Dear Sir

BOUNDARY CHANGE REQUEST – HARRIS PARK TO PARRAMATTA | PARKES 88 PTY LTD | LETTER OF SUPPORT

I am the registered owner of 124 Wigram Street, Harris Park NSW 2150

This letter outlines our support of the submission by Parkes 88 Pty Ltd to request a change to the boundary north of Parkes Street from Harris Park to Parramatta.

The request affects my property and I support the amendment to the suburb name on the same grounds set out in the submissions.

We consider the change to the boundary will be in the best interests of the community and residents in the area. It will undoubtedly add value and in interest to landscape of the City of Parramatta.

I respectfully request that my support for the request sought be given due consideration by Council during their determination.

Yours sincerely,

John Wehbe
Director

PO BOX 3297, North Parramatta, NSW 1750

Johnw@sky-blue.com.au

0411 742 748

23/08/2022

Mr Brett Newman
Chief Executive Officer

City of Parramatta
PO Box 32
Parramatta NSW 2124

Sent by email to "council@cityofparramatta.nsw.gov.au"

Dear Mr Newman,

**RE. REQUEST FOR BOUNDARY ADJUSTMENT – "HARRIS PARK" TO "PARRAMATTA" | PARKES 88
PTY LTD | LETTER OF SUPPORT**

Soho (Parramatta) Pty Ltd is the registered owner of 12A Parkes Street, Harris Park.

We refer to Parkes 88 Pty Ltd request to change the boundary north of Parkes Street, which would result in the suburb change from "Harris Park" to "Parramatta".

The request by Parkes 88 Pty Ltd affects our property, and we support the amendment to the suburb name on the same grounds as set out in Parkes 88 Pty Ltd submission.

We consider the change to the boundary and suburb name adjustment is in the best interests of the community and residents in the area.

On behalf of Soho (Parramatta) Pty Ltd, we respectfully request that our support for the boundary adjustment request is considered by City of Parramatta during their determination.

Yours sincerely,



Joseph Nahas

Director