



MAJOR PROJECT APPLICATION MP10_0068

**PREFERRED PROJECT REPORT AND RESPONSE TO SUBMISSIONS
UNDER PART 3A OF THE EPA ACT 1979**

WESTFIELD PARRAMATTA DEVELOPMENT

**CONCEPT PLAN APPLICATION FOR AN ADDITIONAL RETAIL LEVEL, ADDITIONAL
ABOVE GROUND CAR PARKING, COMMERCIAL TOWER BUILDING & STREET
ACTIVATION/PUBLIC DOMAIN WORKS.**

**PROJECT APPLICATION FOR AN ADDITIONAL RETAIL LEVEL AND ADDITIONAL
ABOVE GROUND PARKING.**



**Prepared for
Westfield Limited**

**By
INGHAM PLANNING PTY LTD**

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Urban and Regional Planning, Environmental Planning and Statutory Planning
Registered Office: Lyndhurst, Suite 19, 303 Pacific Highway, Lindfield N.S.W 2070
Telephone: (02) 9416 9111 Facsimile: (02) 9416 9799
email: admin@inghamplanning.com.au
A.C.N. 106 713 768

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INGHAM PLANNING Pty Ltd

APPENDICES

Appendix A	Proponent Response to submissions prepared by Ingham Planning Pty Ltd dated May 2013
Appendix B	Copy of letter from Department of Planning and Infrastructure dated 19 April 2013
Appendix C	Copy of letters from Australian Government Department of Sustainability, Environment, Water, Population and Communities dated 11 April 2013
Appendix D	Analysis of office building floorplates prepared by Urbis
Appendix E	Plan showing existing and proposed/possible streetfront activation
Appendix F	Supplementary Transport Response prepared by Colston Budd Hunt and Kafes dated June 2013
Appendix G	Economic Impact Assessment (including additional information) prepared by Urbis dated November 2013 revised May 2013
Appendix H	Level by Level description of Stage 1 works (showing revisions from description in the submitted EA)

1. INTRODUCTION

A Concept Plan Application and Project Application (MP 10-0068) for the expansion of Westfield Parramatta was exhibited from 23 January 2013 to 1 March 2013. Submissions have been received from both the general public and Government agencies. The Department of Planning and Infrastructure (DP&I) have also advised the proponent of matters that should be addressed by way of a Preferred Project Report (PPR). This document is a PPR and provides a summary of the final proposal and addresses all the matters raised in relation to the project, in accordance with clause 75H (6) of the Environmental Planning and Assessment Act 1979.

The PPR sets out the proponents response to submissions (**Section 2 and Appendix A**), response to matters raised by DP&I in their letter dated 19 April 2013 (**Section 3**) and details the preferred project (**Section 4**). A revised Statement of Commitments is also included (see **Section 4.3**).

This PPR should be read in conjunction with the Environmental Assessment (EA) dated November 2012 and forms part of the Concept Plan and Project applications.

2. RESPONSE TO SUBMISSIONS

The Concept Plan Application and Project Application (MP 10-0068) for the expansion of Westfield Parramatta was exhibited from 23 January 2013 to 1 March 2013. Submissions have been received from both the general public and Government agencies. A response to the submissions is provided at **Appendix A**. It is noted that the comments in **Section 3** below also address some of the matters raised in submissions.

3. MATTERS RAISED BY DEPARTMENT OF PLANNING AND INFRASTRUCTURE

In a letter dated 19 April 2013, DP&I raised some issues that they required the proponent to address and also requested some further information. A copy of this letter is provided at **Appendix B**. The proponent's response to these matters is detailed below.

3.1 Tower Building Envelope

The DP&I has requested that further consideration be given to the bulk of the tower envelope and recommends that a revised scheme explore an envelope that presents a more slender tower form, which more closely addresses Argyle and Church Street and has direct street level access.

The tower building envelope as submitted occupies an area of approximately 2,000m², which is sufficient to accommodate an office floor plate of some 1,660m². Parramatta Council has requested that the envelope be reduced in size to 1,800m² and floor plate reduced to a maximum of 1,400m². Council has indicated that it would support an increase in building height to a maximum of 120m above ground level, as compensation for reduced floor plate size.

The following two 3D diagrams have been prepared illustrating a comparison of the two alternative indicative tower forms. At the left of each diagram is the proposal as submitted, with a floor plate of approximately 1,660m². The alternative reduced floor plate size of 1,400m² is shown at right on each diagram. Diagram 1 shows a view looking southwest to the site. Diagram 2 shows a view looking northeast to the site.

Diagram 1 3D Indicative Tower Forms - View Looking Southwest to the Site



Diagram 2 3D Indicative Tower Forms - View Looking Northeast to the Site



The 3D illustrations indicate that the perceived difference in bulk and scale between the two floor plate sizes is modest at most. If anything, the slimmer, but taller option is more noticeable, due to the building encroaching further into the skyline compared to nearby residential towers in Church Street. The upper levels of the slimmer tower version will also be visible from Old Government House, whereas the tower form at the height proposed has no visual impact on the outlook from Old Government House. This is an important factor as comments have been received from the Australian Government Department of Sustainability, Environment, Water, Population and Communities regarding the potential impact on Old Government House (see **Appendix C**). They raise no objection to the current proposal.

Part 2.3 of Council's City Centre DCP 2006 states a "*preferred maximum floorplate area of a building is 2,500 square metres*" and "*the horizontal dimensions of any building shall not exceed 60 metres.*" The proposed floor plate size is almost 30% less than the permitted maximum floor plate and the maximum horizontal dimension is well under 60m.

The DCP controls go on to state that on land outside the Commercial Core, as is the case with the subject land, "*the preferred maximum floor plate area of non-residential buildings is 1,200 square metres and maximum depth is 20m.*" Compliance with such a restrictive control would

render the office tower unviable in terms of meeting target market requirements for premium office space that is suitable for major tenants.

The DCP allows larger floor plates for commercial buildings where they are *“expressed as separate building elements of not more than 1,200m².”* It is not feasible to split the proposed office tower into “separate building elements.” Providing two connected building elements with floor plates of approximately 800m² each, or one of 1,200m² and one of 400m² is not practical in terms of meeting major tenant floor space configuration requirements.

While tower buildings constructed in Parramatta over recent years have floor plates typically ranging in area from 1,100m² to 1,300m², there have been some exceptions. The Sydney Water HQ constructed in 2006 has an average floor plate size of 1,659m², almost exactly the same as proposed for the Parramatta Westfield site.

The lack of large floor plate office towers in the Parramatta CBD place Parramatta at a disadvantage for attracting major corporations and government departments as anchor tenants, compared to alternative locations such as Macquarie Park, Norwest Business Park, Rhodes and Sydney Olympic Park. These competing centres provide average floor plates generally in excess of 1,800m², with many buildings providing floor plates of more than 2,000m². This is addressed in detail in the analysis undertaken by Urbis at **Appendix D**.

The proposed floor plate dimensions result from Westfield’s investigations of the market for high grade and possible “headquarters” office space, where it is evident that there is a trend for larger organisations to occupy larger floor plate formats in A Grade office developments. Imposition of a consent condition that requires a reduction in floor plate size to anything more than a minor extent will undermine viability of the office tower component of the project.

3.2 Public Domain and the pedestrian environment

The DP&I raises concerns regarding the scope and timing of public domain works and about the pedestrian environment as it relates to streetfront activation and public art.

Possible public domain improvements fall within two categories; those around the boundaries of the site (within the footpath reserves of the public roads fronting the site) and those external to the site, for example connecting to Parramatta Square and Council’s parking station to the east of the site.

3.2.1 Public domain adjoining the site

The Stage 1 works involve only minor changes at the ground level of the site and as such it is not reasonable to require wholesale upgrade to the public domain adjoining the site except where it is damaged as a result of the Stage 1 construction. It is noted that the public domain on Argyle and Church Streets was last upgrade only relatively recently when the new cinemas opposite in Church Street were constructed.

Further, the construction of Stage 2 has the potential to impact on the public domain. Therefore if any public domain works beyond basic repair were required, this should logically occur only after Stage 2 is complete.

The above issues are typically resolved by way of an appropriate condition of approval. Notwithstanding the above comments the proponent is agreeable to undertaking public domain improvements that are considered appropriate and reasonable for each Stage of the

development. This is part of the Statement of Commitments and conditions of approval can require the preparation of a Public Domain Plan which could include items such as new footpath paving, landscaping, street furniture, lights and the like, of a reasonable scope in accordance with Council's specifications for the public domain. The plan could also nominate which works are to be completed in the respective stages of the proposed development.

3.2.2 Public domain beyond the site frontages

With respect to public domain improvements external to the site, beyond the boundaries of the site's road frontages, Parramatta Council has not indicated what public domain works it is seeking, other than in very general terms.

The Environmental Assessment submitted with the Major Project Application envisages that Council would fund "external" public domain improvements from a portion of the Section 94A levies of some \$12.15 million payable to Council by the Proponent. It is unreasonable for Council to require the Proponent to fund off-site public domain improvements in addition to payment of a substantial S94A levy. CBD improvements are included amongst the projects for which the S94A levy of 3% of project cost is charged against new development in the CBD.

The situation here is different from other Part 3A projects in areas where Section 94 is not based on a percentage of construction cost methodology. In those circumstances, the Section 94 Plans do not take into account the impact of development beyond the scope of current development controls. In such cases a Planning Agreement is often necessary to take into account additional demand for facilities and services. Where a percentage method is used, additional floor space (which generates additional construction cost) attracts a higher Section 94 contribution and Council is able to use this for a wide variety of public benefits. In this circumstance it would be totally unreasonable and unjustified to require any further contributions beyond that required under Section 94.

3.2.3 Activation of the streetfront

The DP&I requests that consideration be given to addressing the impact of inactive facades at ground floor level and alternative treatments to activate these facades, including insertion of shopfronts, access points etc.

As noted above there are minimal changes proposed at ground level of the existing development in both Stages 1 and 2. The only location with any real relationship with the streetfront is at Level 3 near the corner of Church and Campbell Streets (see **Figure 1**). Here a retail tenancy is provided at the streetfront.

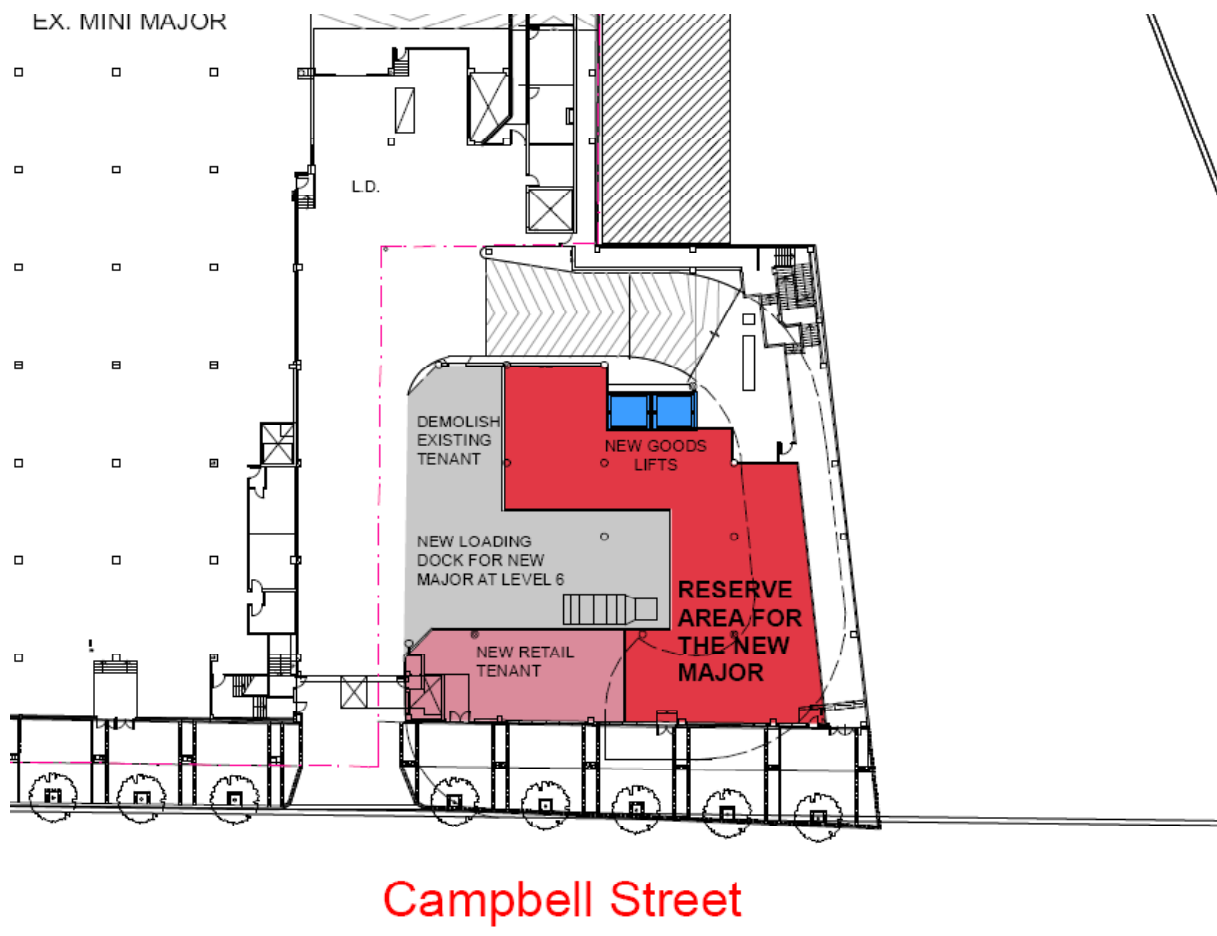


Figure 1 – new streetfront tenancy

Stage 2 is a new office tower that sits above the podium and will utilise the entry off Church Street for the existing commercial building. Therefore again there is nothing in this proposal that prompts the need to require streetfront activation.

Notwithstanding the above, the proponent understands the desire of Council to improve the overall quality of the public domain through streetfront activation. However in circumstance where there is a very large existing building that was originally constructed in the 1970's and has been extended at various times since, it is very difficult and cost prohibitive to make significant changes to the fabric of the building, particularly when no major redevelopment of these areas is proposed. The plan attached at **Appendix E** provides an analysis of the existing constraints.

Many of the existing 'inactive' areas are unable to be altered as they are part of the important 'back of house', services and fire safety infrastructure within overall development. Other areas have potential for activation but are constrained by existing lease arrangements that preclude any significant changes. However, it may a year or two before a DA is submitted for Stage 2 there is the opportunity to explore ways of activating the streetfront as indicated in the plan at **Appendix E**. The proponent is willing to accept a condition of approval requiring details of how increased activation of the ground level streetfronts is to be achieved, where reasonable and feasible, as part of any future DA for Stage 2.

The large scale redevelopment of Westfield Parramatta, in a similar manner to the upgrade of Westfield Bondi Junction and Westfield Sydney, is cost prohibitive. Those projects involved

significant expansions and integration with additional properties and this allowed for improvements to be made to the presentation to the public domain. These are also centres that are surrounded by busy retail precincts. Parramatta is significantly different. Here there is no significant development to the south, west or east that would make the enormous cost of creating additional permeability justifiable. In this regard it is noted that the existing development already provides for through-site links in the form of pedestrian mall that allow permeability in a controlled climate, which is desirable for pedestrians. These links include underground access to Parramatta station providing a safer environment for movement through the area.

The proposal for Westfield Parramatta is largely limited to adding to the upper levels of the building as this is the only viable way of expanding and improving the development. Significant works at ground level are not proposed and not justified given the nature of the development.

3.2.4 Art works

The DP&I has requested that consideration be given to the provision of an Arts Plan in support of the public domain or elevational works. The Proponent supports the preparation of an Arts Plan and is agreeable to preparing such a Plan in consultation with Council and provide a reasonable level of funding, in the vicinity of \$60,000, to support implementation of this Plan. This is identified in the revised Statement of Commitments in **Section 4.3** below.

3.2.5 Landscaping

It is noted that the plans have been amended to ensure consistency with the 3D images in regard to the provision of landscaping. Appropriate conditions of consent can require further information regarding the landscaping for Stage 1. Further details regarding landscaping of the commercial tower will be submitted as part of any future DA for Stage 2. .

3.3 Traffic and transportation

The DP&I has requested further information to address access to taxi services, with the aim of providing more convenient access to taxis. The proponent has agreed to provide a taxi pick up/set down area on Level 4 next to existing pedestrian footpath leading to the mall entry. The plans have been amended to include this facility. This amendment results in the loss of 11 car spaces.

The comments by the RMS in relation to traffic modelling has been addressed and a response is provided in a Supplementary Report prepared by Colston Budd Hunt and Kafes (with input from Parsons Brinckerhoff) at **Appendix F**. The additional work that has been carried out confirms that:

- The identified Council/RMS upgrades and proposed upgrades mitigate the impacts of the proposed extensions. Traffic conditions in the AM and PM peaks would be similar or better than the existing situation; and
- The internal car park upgrades reduce the impact of the Westfield traffic on the road network.

The Supplementary Report also responds to the matters raised by Transport for NSW submission regarding the non-car modes in the Traffic Management and Accessibility Plan (TMAP). It concludes that:

- There is spare capacity on existing public transport services to accommodate the additional demand generated by the proposed development; and
- That planned improvements to public transport services (improved bus access, new bus and rail links, and potential light rail) will address a number of existing capacity constraints and assist the planning goals of increasing the proportion of trips to/from Parramatta CBD by non-car modes.

3.4 Economic Impacts

The DP&I requested that further consideration be given to the relationship of the proposed expanded Centre with, and likely future impacts on, the Parramatta Square development. Parramatta Square is an initiative of Parramatta Council and it making its submission to the exhibition of the proposal, Council acknowledges that it is a competing developer.

The proposed expansion of Westfield Parramatta makes a positive contribution to the economy of the Parramatta CBD. Westfield Parramatta is located within the Parramatta CBD and is an integral part of the CBD retail scene. Improving the range and quality of retailing in Westfield Parramatta will attract more shoppers to Parramatta and reduce “escape” expenditure.

The proposed expansion of Westfield Parramatta will not materially impact on Council’s proposed Parramatta Square development. The Proponent’s economic impact assessment consultant, Urbis, has undertaken additional impact assessment relating to Parramatta Square, as part of the preparation of a response to economic impact issues raised in submissions to the exhibition of the proposal. An updated version of the Urbis Economic Impact Assessment is provided at **Appendix G**.

With respect to impacts on Parramatta Square, Urbis note that the retail component of Parramatta Square is relatively small and is expected to contain up to 6,000sqm of “shop uses” to be developed within the next 10 to 15 years (beyond the opening date of the proposed expansion of Westfield Parramatta). Urbis further notes that the type of retailing proposed for Parramatta Square is more focused on serving local workers and visitors rather than the higher order “destination” style retail facilities envisaged in the proposed expansion of Westfield Parramatta.

Urbis estimates the level of one-off impact on Parramatta Square at 1.5%, which is a low impact level. This level of impact will not have an adverse impact on the trading potential of retailers at the Parramatta Square precinct. Accordingly the viability and role of the planned centre will not be undermined by the Westfield Parramatta expansion.

Westfield Parramatta is an integral and important component of the Parramatta CBD. By developing its site in the manner proposed there is an enhancement of opportunities for new retail facilities in the Parramatta CBD that will improve the quality and range of retailing in the CBD and increase retail expenditure. Such an outcome will also reduce the “escape” of retail expenditure within the trading catchment of Parramatta that is currently being diverted to the Sydney CBD, due to the lack of “high end” retailers in Parramatta. The longer term economic impacts on Parramatta Square and the Parramatta CBD as a whole, arising from the proposed development are positive.

As noted above, the PPR provides a correction to the total GLA figure provided in the EA. It is 24,504sqm, consistent with the amount referred to in the submitted Economic Impact Assessment.

3.5 Reports to be Updated

There have been no changes of significance to the original scheme as discussed in detail in **Section 4** below. The only material change is the introduction of a taxi rank which results in the loss of 11 car spaces. All of the reports assess impacts of the Concept Plan application and the Project application concurrently, as is appropriate in this circumstance. The assessment differentiates between Stages 1 (the retail and parking component) and Stage 2 (the office tower component). The assessment of Stage 1 is more detailed as this Stage is part of both the Concept Plan and the Project application. The tower is only part of the Concept application and so the assessment of impact relates to the proposed building envelope and floor space, not the detailed design. The submitted reports provide an appropriate and accurate assessment of the proposed development.

The only report that has been recast is the Economic Impact Assessment. This is due to the changes required as a result of issues raised in submissions. The new report is attached as **Appendix G** and replaces the originally submitted report.

3.6 NSW Draft Metropolitan Strategy for Sydney (draft Metro Strategy)

The proposal is highly consistent with the aims and objectives of the draft Metro Strategy. In particular it is supportive of the following:

Balanced Growth

OBJECTIVE 2: Strengthen and grow Sydney's centres

Policies

c. Encourage growth in all centres and Specialised Precincts within the Global Economic Corridor and extend its overall reach to Norwest and Parramatta.

e. Expand central commercial core areas in Global Sydney and the Regional Cities.

f. Plan commercial cores for Major Centres and Specialised Precincts where there is market demand and investment opportunities.

h. Locate larger commercial premises in Strategic Centres.

The proposal reinforces Parramatta's role as a regional city in western Sydney, increasing the availability of goods and services, providing employment and increasing expenditure in the centre.

The proposed office tower is adjacent to the existing commercial core, which, in accordance with the above will expand over time. Consistent with providing the highest density of employment near transport nodes, the site has a direct link to Parramatta railway station.

OBJECTIVE 4: Deliver strategic outcomes - nine city shapers

One of these city shapers is the growth of Parramatta.

PARRAMATTA

Parramatta is Sydney's Premier Regional City and single biggest concentration of employment outside Global Sydney.

Parramatta is anticipated to be the fastest growing centre outside Global Sydney over the next 20 years.

As Sydney's population grows and changes over the life of this Strategy, more than 50 per cent of Sydneysiders will be residents of Western Sydney and will be serviced by Parramatta.

Parramatta is expected to grow beyond its own CBD boundaries into the surrounding precincts of Westmead, North Parramatta, Harris Park, Rydalmere (including the University of Western Sydney campus) and Rosehill/Camellia.

The 'Priorities for Parramatta' include the creation of *"an additional 21,000 new jobs in Parramatta CBD and support opportunities for economic clustering by extending the commercial core"*. The proposal will provide potential for approximately 2700 direct operational jobs and even more taking into account construction and multiplier effects. This will assist Parramatta in meeting the draft Metro Strategy growth targets.

A Liveable City

Objective 7: Deliver well-designed and active centres that attract investment and growth

Policy

- a. Existing centres will grow and change and new centres will be supported.*
- b. Retail, employment, cultural and social infrastructure will be included in centres undergoing growth and renewal.*
- c. The protection and use of heritage assets will be planned for upfront in urban renewal or establishing new centres.*
- d. New centres will follow principles of good urban design.*

The proposal assists in growth and change in Parramatta, providing retail and employment opportunities.

It will not have adverse heritage impacts.

It is not located in a new centre and as such the urban design outcomes need to be considered having regard to the constraints of the existing situation. The proposed additions are of high quality design and the new office tower will be subject of a competitive architectural design process which will ensure a high quality outcome for the city.

Productivity and Prosperity

Objective 10: Provide capacity for jobs growth and diversity across Sydney

The proposal will assist in meeting the employment targets for Parramatta.

OBJECTIVE 14: Provide a good supply of office space

The proposal will assist in growing Parramatta as a centre for commerce.

OBJECTIVE 15: Provide for a good supply of retail space

The proposal will reinforce Parramatta as the primary retail destination in western Sydney.

Accessibility and Connectivity

The site has a directly link to Parramatta railway station and the proposal provides for a reduced rate of parking on the site. These aspects of the development will assist in increasing the use of public transport, consistent with the objectives of the draft Metro Strategy.

West Central and North West Subregion

The proposal is consistent with the objective that Parramatta be the 'Premier Regional City and Second CBD' for western Sydney (see **Figure 2**).

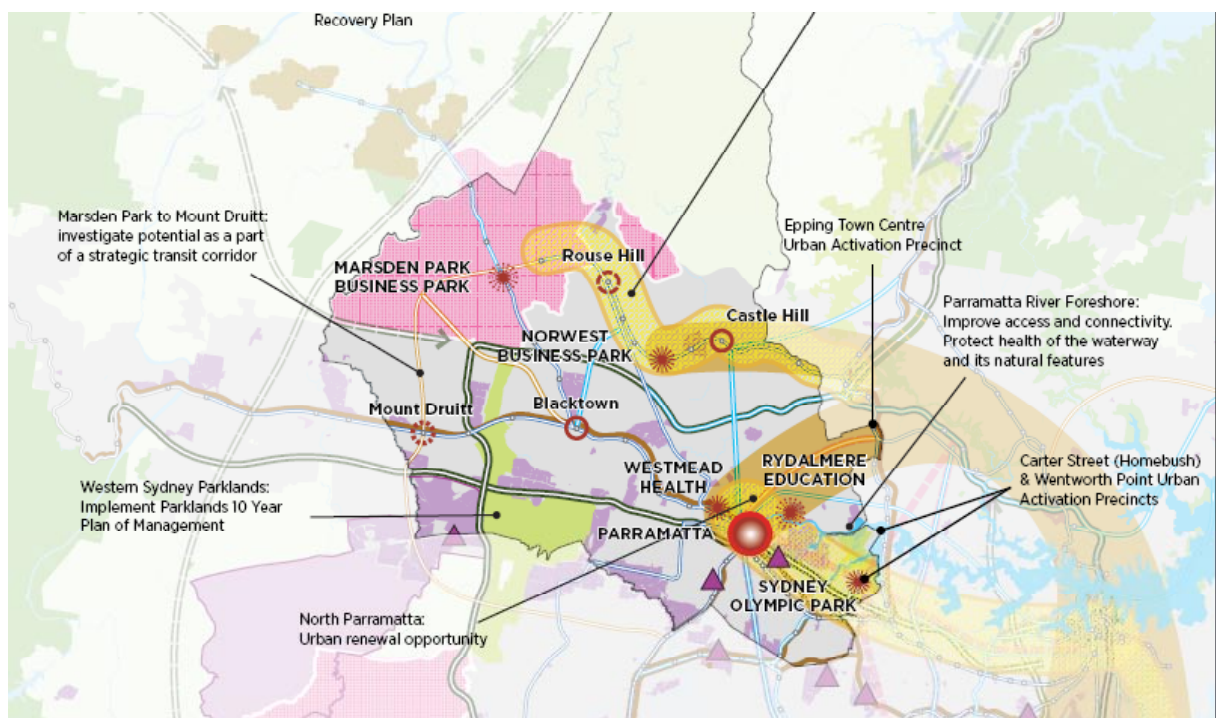


Figure 2 – Parramatta within its subregion

4. THE PREFERRED PROJECT

As a result of the consideration of submissions and the issues raised, minor changes have been made to the submitted plans and the proposal generally. As requested by DP&I, the submitted plans have been amended to make it clearer as to the subject of the Concept Plan application and the Project application. The Statement of Commitments has also been revised to take into account submissions and the issues raised.

4.1 Concept Plan

No major change has been made to the development for which approval is sought under the Concept Plan application. As noted above the plans have been amended but only to the extent that they clarify the differences between the Concept Plan and the Project application. The only change to the indicative statistics relating to the Concept Plan the reduction in car parking by 11 spaces resulting from the change to the detailed (Stage 1) plans which now provide a taxi rank at Level 4.

Approval is sought for the concept approval of 2 separate developments which are intended to be constructed in 2 stages. These are:

Stage 1

- An additional retail level providing for a Discount Department Store, a Supermarket, Mini Majors and specialty stores comprising around 31,495sqm of retail GFA (24,504sqm GLA).
- Modification of the existing Level 5M2, 6 and 6M car parks and construction of 3 additional car parking levels (Levels 6M to 8) providing an increase of around 562 car spaces to a total of around 4,990 spaces;
- Various related changes throughout the building.

Stage 2

- Demolition of existing offices above podium in the northeast corner of the site.
- A 20 storey office tower (up to 35,000m2 GFA) averaging around 1,750m2 of GFA per floor level, above the existing retail podium, at the corner of Church Street and Argyle Street. There will also be ancillary works in other parts of the building including structural work to allow construction of the tower, the provision of a 'sky lobby' at Level 5 and
- Improvements at ground level, where possible, to increase activation along the Church, Argyle Street and Campbell Street frontages.
- Enhanced pedestrian amenity and ground level connectivity to Parramatta Railway Station/Interchange and other nearby public facilities.

Note that the above only relates to 'concept' approval and that further approval is required for the undertaking of the works. In this regard, a Project application has been submitted concurrently with the Concept Plan application, seeking approval for the construction of Stage 1 above. A Development Application will be required for works relating to Stage 2.

4.2 Project Application

Project Application approval is sought for construction of Stage 1 outlined above. The Level by Level description of the proposed works contained in the EA is repeated below. The only material change is the introduction of the taxi rank at Level 4 and this is the only change made to the submitted plans (apart from clarification of the Concept and Stage 1 Project Plans). Other changes are simply corrections/clarifications. For clarity, the minor changes that have been made to the description in the EA are shown as revisions in **Appendix H**.

It is noted that the EA indicated a total proposed floor space of 22,846sqm GLA however this was incorrect and the actual amount is in accordance with the submitted Economic Impact Assessment - 24,504sqmGLA. As noted above the proposed number of car spaces has been reduced to 4990 (562 additional).

LEVEL 1

- a To remain unchanged

LEVEL 2

- a Alterations to loading dock Zone F (off Campbell Street).

- b. New loading dock and goods lifts for the relocation of the existing supermarket from Level 2 to Level 6 with a reserve area of 220m².
- c. New turning area for trucks by reduction of the storage area and reconfigure the existing supermarket loading dock.
- d. Proposed new vehicular entry to Aird Street car park Zone E and minor alterations to the car park layout and alterations to Aird Street loading dock.
- e. f. Removing 20 car spaces to allow for bicycle and motorbike parking.

LEVEL 3

- a. Penetration to accommodate new goods lifts servicing the relocated supermarket, with such penetration extending through the levels above.
- b. When the Stage 2 office tower is completed, allocation of a loading dock and future goods lift for the Stage 2 commercial tower.
- c. Existing speed ramp entry at Aird Street to be altered to be one lane only

LEVEL 3M

- a. New additional parking area to the northwest corner of Aird Street car park providing for an additional 6 car spaces

LEVEL 4

- a. Demolition of existing retail (920m² GLA) at Campbell Street (Zone D).
- b. Replace retail area removed at Item (a) above with a new loading dock and reserve area (440m²) for the Discount Department Store proposed at Retail Level 6 and 2 new goods lifts, with the remaining 140m² (GLA) to be used for a new shop or storage area.
- c. New loading dock for specialty shops at proposed Retail Level 6 at Zone C
- d. Bicycle and motorbike parking spaces allocated next to the pedestrian footpath at Campbell Street car park Zone C, with amenities.
- e. Existing speed ramp entry at Aird Street Zone F to be one lane to accommodate a pedestrian footpath and the ramp is to be used as a speed ramp only.
- f. Remove 7 car spaces (in Stage 2 a further 15 car spaces are to be removed to provide space for bicycle parking and facilities for the office tower)
- g. New additional parking area to the northwest corner of Aird Street car park Zone E providing for an additional 6 car spaces.
- h. New Taxi Pick up/ set down allocated next to pedestrian footpath.

LEVEL 4M

- a. New additional parking area to the northwest corner of the Aird Street car park to provide an additional 6 car spaces.

LEVEL 5

- a. Relocate the existing Supermarket to Level 6 and replace this supermarket space with 2 new Mini Majors (3,969m² GLA) and speciality shops (541m²), for a net reduction of 247m² GLA of retail at Zone D.
 - b. The existing loading dock to be utilised for a loading dock for the new mini majors and specialty shops.
 - c. 2 new goods lifts to service the new Mini Majors and new shops at level 6
-

- d Relocate existing travelators at Zone F and replace this space with a new shop (211m² GLA).
- e. Total reduction of 27m² retail GLA on Level 5.
- f. New additional parking area to the northwest corner of Aird Street car park Zone E (additional 6 car spaces in Zone E).

LEVEL 5M1

- a. To remain unchanged

LEVEL 5M2

- a. Removing existing skylights, enlarge the voids as shown on demolition floor plans at Zone C.
- b. Demolition of existing car park ramps at Zone C.
- c. Adding a new travelators at Zone D.
- d. Extending ramps to the new car park levels at Zone F.
- e. Relocation of existing plant to new roof level.
- f. Add a new passenger lift.
- g. Remove 98 car spaces at Zones C and D.
- h. New additional parking area in the northwest corner of Aird Street car park (Zone E) to provide a net 6 additional car spaces.

LEVEL 6

- a. Proposed new retail specialty shops and kiosks (6,679m² GLA), new Discount Department Store (8,263m² GFA), new supermarket (4,412m² GLA) relocated from Level 5 and proposed 5 new mini majors (4,781m² GLA) (Zones A, C, D & F).
- b. Extending the goods lifts and new travelators to this level.
- c. Extending the existing speed ramp from Campbell Street (Zone F) up to Level 7 car park.
- d. New car ramps up to Level 6M at Zone C.
- e. Removing 414 car spaces on Level 6.
- f. New additional parking area in the northwest corner of Aird Street car park providing an incremental increase in car parking of 6 car spaces.
- g. Additional amenities and storage area.
- h. Car bridge link between Zone E and Zone F car parks.
- i. Adding a new travelators at Zone D.
- j. New travelators up to Level 6M carpark at Zones C & E

LEVEL 6M

- a. Demolish part of existing car park slab at Zones A and C, to allow construction of new Level 6 Retail as shown in section drawings (reduction of 287 car spaces).
- b. Extending the car park deck at Zone C to line up with car park Level 6.
- c. Extending the car park ramp at Zone F to the proposed Level 7 car park.
- d. New penetration at Zone A for the new ramps connecting Level 6M to the Level 6 car park.
- e. New car ramps at Zone A to connect to the new Level 7 car park.
- f. New additional car park level at Aird Street car park Zone E providing for an additional 156 car spaces.
- g. New travelators and extending passenger lifts to Level 6M and up to Level 7 at Zones C, A and F.

- h. Adding a new travelators at Zone D.
- i. New car ramp at Zone B up to level 7 carpark at Zone C

LEVEL 7

- a. Additional car park level above the new supermarket at Zone F providing 161 car spaces.
- b. Additional car park level above existing Aird Street car park Zone E providing an additional 135 car spaces.
- c. Additional car park slab above existing Campbell Street car park at Zone C providing an additional 191 car spaces.
- d. Connecting the new car parks with bridges.
- e. New travelators, escalators and passenger lifts to Level 7 and up to Level 7M.
- f. Extending the speed ramps up to Level 7 and up to Level 7M (Zone F)
- g. New Skylights above the mall Zones A, C, D & F.
- h. New steel roof to cover the new retail at Zone A.
- i. New car ramp link Argyle Street Zone A car park to Campbell Street Zone C car park and a car bridge link between Zone E and Zone F car parks.

LEVEL 7M

- a. Additional car park level above the proposed footprint of Level 7 car park providing 562 car spaces for staff parking.
- b. Extending travelators, escalators and lifts to Level 7M and up to Level 8 at Campbell Street car park only
- c. Extending the speed ramps up to Level 7M and new ramps up to Level 8 at Campbell Street car park Zone C

LEVEL 8

- a. Additional car park level above the Level 7M Campbell Street car park providing an additional 215 car spaces (115 for retail staff parking and subsequently 100 allocated to the future office tower when this building is constructed).
- b. Extending travelators, escalators and lifts up to Level 8.
- c. Extending the speed ramps up to Level 8.

4.3 Revised Statement of Commitments

In response to matters raised, the draft Statement has been revised to include a commitment in relation to Art Works.

ISSUE	COMMITMENT	APPROVAL AUTHORITY	TIMING
Building Code of Australia & Australian Standards	The proposed building is designed to meet all relevant requirements of the BCA & Australian Standards	PCA	Prior to issue of Construction Certificate
Demolition	Demolition work will comply with the requirements of AS2601:2001 in relation to Demolition of Structures. A work plan required by AS260.1:2001 will be	PCA	Prior to issue of Construction Certificate

ISSUE	COMMITMENT	APPROVAL AUTHORITY	TIMING
	accompanied by a written statement from a suitably qualified person that demolition works in the work plan comply with the safety requirements of the relevant Standards.		
Geotechnical and excavation	Geotechnical and excavation issues associated with structural strengthening will be addressed as part of the preparation of Construction Certificate documentation. This is not a significant issue as minimal excavation is required. A dilapidation survey will be undertaken of adjoining properties prior to works commencing.	PCA	Prior to issue of Construction Certificate
Pedestrian access during construction	Pedestrian access along public footpaths around the site will in the main be retained during construction and suitable pedestrian safety measures implemented where required (see CMP)..	Council	During Construction
Access to car parking during construction	The final Construction Management Plan will include a Car Parking Management Plan to ensure adequate parking is available during the construction phases.	PCA	During Construction
Accessibility	The proposed development will be designed & constructed to comply with the relevant Australian Standards, the BCA & the intent of the Disability Discrimination Act with respect to access.	PCA	Prior to issue of Construction Certificate
Public domain works	A public domain improvements plan will be prepared in consultation with Parramatta City Council for public domain improvements. Timing of construction of public domain improvements will be negotiated with Council.	Council	A Public Domain Improvement Plan will be prepared, finalised and approved, prior to occupation of Stage 1 works. Rectification of any damage to public infrastructure will be completed prior to building occupation.
Street Activation	The concept plan for street activation of the Argyle Street interface will be further developed in consultation with Council.	Council	Argyle Street Activation Plan approved by Council prior to finalisation of Stage 2 Plans.
Art work	An Art Works Plan is to be prepared in consultation with Parramatta Council. Westfield will commit up to \$60,000 towards art works aimed at adding to the overall quality of the public domain including the main pedestrian entries to the development.	Council	An Art Works Plan will be prepared, approved and implemented, prior to occupation of Stage 1 works.
Office Tower Architectural design Competition	An Architectural Design Competition will be held for the design of the office tower and a preferred design adopted by the proponent.	Council	Within 12 months of occupation of Stage 1.
S94A Developer Contributions	The proponent undertakes to pay the S94A Developer Contribution (currently 3% of project value) to Council, payable with each respective stage of the development.	Council	Contribution for Stage 1 paid prior to issue of Stage 1 Construction Certificate (CC). Contribution for Stage 2 paid prior to issue of Stage 2 (CC).

ISSUE	COMMITMENT	APPROVAL AUTHORITY	TIMING
Transport Accessibility Plan/Guide/Brochure	Preparation of Transport Accessibility Plan/Guide to inform visitors, shoppers and workers of transport options to access the site without the need to rely on private motor vehicles.	NSW Department of Transport	Prior to occupation of Stage 1.
Road/traffic improvements	Implement road and traffic improvements on the Great Western Highway, Campbell Street, Church Street (northbound) and modifications to signal timing as outlined in Section 3.38 of the Traffic Impact Study report prepared for the project by Colston Budd Hunt & Kafes Pty Ltd, dated October 2012	Council & Roads & Maritime Services	Prior to occupation of Stage 1.
Construction hours	In accordance with the CMP, construction hours will be limited to between 7am and 6pm Monday to Friday and 7am to 5pm Saturdays. Variations where required, will be identified in consultation with Council.	Council	During Construction
Construction Management	A Draft Construction Management Plan has been prepared (see Appendix O of the EA). Construction will be undertaken in accordance with the final approved versions of these plans.	PCA	Prior to issue of Construction Certificate and during construction for work activity on the site.
Ecologically Sustainable Development	<p>The proposed retail level will achieve a 4 Green Star Retail design rating. The proposed office tower development will achieve a 5 Green Star Office design rating.</p> <p>Prior to issue of the Construction Certificate for each stage of proposed works, an ESD strategy will be provided outlining measures to be incorporated into the building.</p>	PCA	Prior to issue of the Construction Certificate for each stage of the development.

5. CONCLUSION

The matters raised during the public exhibition process and by the relevant authorities have been duly considered and addressed through amendments to the proposal and the detailed response in this Preferred Project Report.

The subject land is strategically located within the Parramatta CBD, adjacent to the Parramatta Railway Station and Transport Interchange. The site is large in size and capable of successfully accommodating increased development density and height in the manner proposed. The site's accessibility to public transport and the civic and central core area of the Parramatta CBD make it an ideal location for additional retail and employment activity.

The proposed additional retail level will enable an expansion of retail services within the Parramatta CBD, including opening of new international, national and inter-state retailers that currently do not have a presence in the Parramatta CBD. This will attract more visitors and shoppers to Parramatta and enhance Parramatta as a shopping destination, comparable to the Sydney CBD.

The proposed 20 storey commercial building planned for Stage 2 will achieve design excellence and provide a much needed A Grade 5 Green Star office space for the City of Parramatta, the primary commercial centre for Western Sydney. Proximity to the Parramatta Transport Interchange and large floor plates with expansive views will be attractive to major private sector businesses and government agencies seeking high quality office space.

The proposed development will be of a contemporary design and includes high quality building finishes. The public domain and Argyle/Church Street facades will be enhanced in Stage 2 and increased street activation provided to Argyle Street. Building design responds to the site's context, avoids adverse impacts on heritage items in the locality and maintains reasonable neighbour amenity, having regard to the high density context of the site and its use as a major shopping mall.

The development is consistent with the planning and development objectives for the locality and generally accords with the applicable development controls. Some flexibility is sought with respect to the floor space ratio, given that a shopping mall of this scale requires a substantial floor area of car parking. This area of above ground car parking would usually be excluded from FSR calculations. A variation is also sought to the 36m maximum building height control for the site to permit an iconic landmark office tower in the northeast corner of the site, at the southern gateway to the Parramatta CBD.

Traffic impact assessment indicates that the proposed development will have minimal impact on the surrounding road network, and intersections will continue to function satisfactorily at their current service levels. Limiting additional on-site parking to approximately 35% of the maximum car parking permitted will moderate traffic generation impacts and encourage use of public transport. Sufficient parking will be provided for those who rely on private motor car transport.

The proposed development will have minimal impact on the natural environment or amenity of the area. Aural and visual privacy is maintained. Residential apartments currently receiving at least 2 hours mid-winter solar access will continue to receive at least 2 hours mid-winter solar access. All most all residential units will retain at least 3 hours mid-winter solar access.

View impacts are acceptable given compliance with building height limits for the additional retail and parking levels. The future office tower building will have a curved tower form that has only a modest impact on views from surrounding properties. Such view impacts will be temporary, due to future high rise towers that will be developed along Hunter Street.

The proposal will have positive social and economic impacts, particularly in terms of accommodating planned employment growth for the Parramatta CBD. The proposed development accords with integrated land use and transport planning principles, by locating jobs and retail services close to a major public transport interchange.

The alternative to not proceeding with the proposed development would be redirection of major private investment by Westfield, away from Parramatta, with this investment most likely to be re-directed interstate or overseas to other Westfield projects.

Having regard to the planning objectives for the area, the context of the site, including its constraints and opportunities, and the design qualities of the building, it is considered that the proposed development is a suitable development of the site.

The project is in the public interest and will make a positive contribution to the environment, economy, public domain and architecture of the Parramatta CBD. Our assessment of the proposal indicates following a review of the submissions made and issues raised, that it remains worthy of approval as a Major Project under Part 3A of the Environmental Planning and Assessment Act.

Ingham Planning Pty Ltd

June 2013
