

role, function, vitality or viability of any existing or planned centres as a result of the additional retail floor space, the Department is supportive of the proposed retail expansion.

5.2. Traffic and Transport issues

5.2.1 Road Network Infrastructure Upgrades

Traffic generation and impacts on the surrounding road network were key issues raised by Council, Transport for NSW (TfNSW) and Roads and Maritime Services (RMS). The Department engaged ARUP to provide an independent traffic and transport review, and ARUP also raised concerns with respect to traffic generation and impacts.

Initial concerns related to deficiencies in the modelling of the traffic impacts and therefore the accuracy of the predicted impacts. The proponent subsequently undertook revised modelling which was submitted with the PPR. The revised modelling was carried out in consultation with RMS. The RMS raised no further issues with the modelling and subsequently advised they were prepared to rely on the proponent's revised modelling in order to assess traffic impacts. The Department is therefore also satisfied that the modelling submitted with the PPR provides a reasonable basis on which to assess traffic impacts.

The traffic assessment submitted with the PPR calculates that during the PM peak (the busiest time of day), the proposal will result in an additional 480 vehicle movements per hour, being 450 vehicle movements associated with the retail development and 30 vehicle movements associated with the proposed commercial tower.

The road network in the vicinity of the site already experiences high volumes of traffic and during peak periods and many nearby intersections (particularly on the Great Western Highway) operate at very poor service levels (level of service 'F') with congestion and long queuing times.

To assess the impacts of the development, 8 models were created, being four AM peak hour models and four PM peak hour models in each of the following circumstances:

- Year 2012 base model;
- Year 2016 base case: Includes future background traffic without additional development traffic;
- Year 2016 Scenario 1: Future background traffic with additional development traffic; and
- Year 2016 Scenario 2: Future model incorporating network improvements required to mitigate the impacts of the additional development traffic.

The network improvements modelled in Scenario 2 include:

1. Upgrade of intersection at Great Western Highway and O'Connell Street;
2. Upgrade of intersection at Great Western Highway and Marsden Street;
3. Upgrade of intersection at Great Western Highway and Church / Parkes Streets;
4. Improvements on Campbell Street and the intersection of Campbell and Church Streets; and
5. Various improvements to Westfield carpark entry and exits.

The location of the intersection upgrade works are depicted in the **Figure 11**:

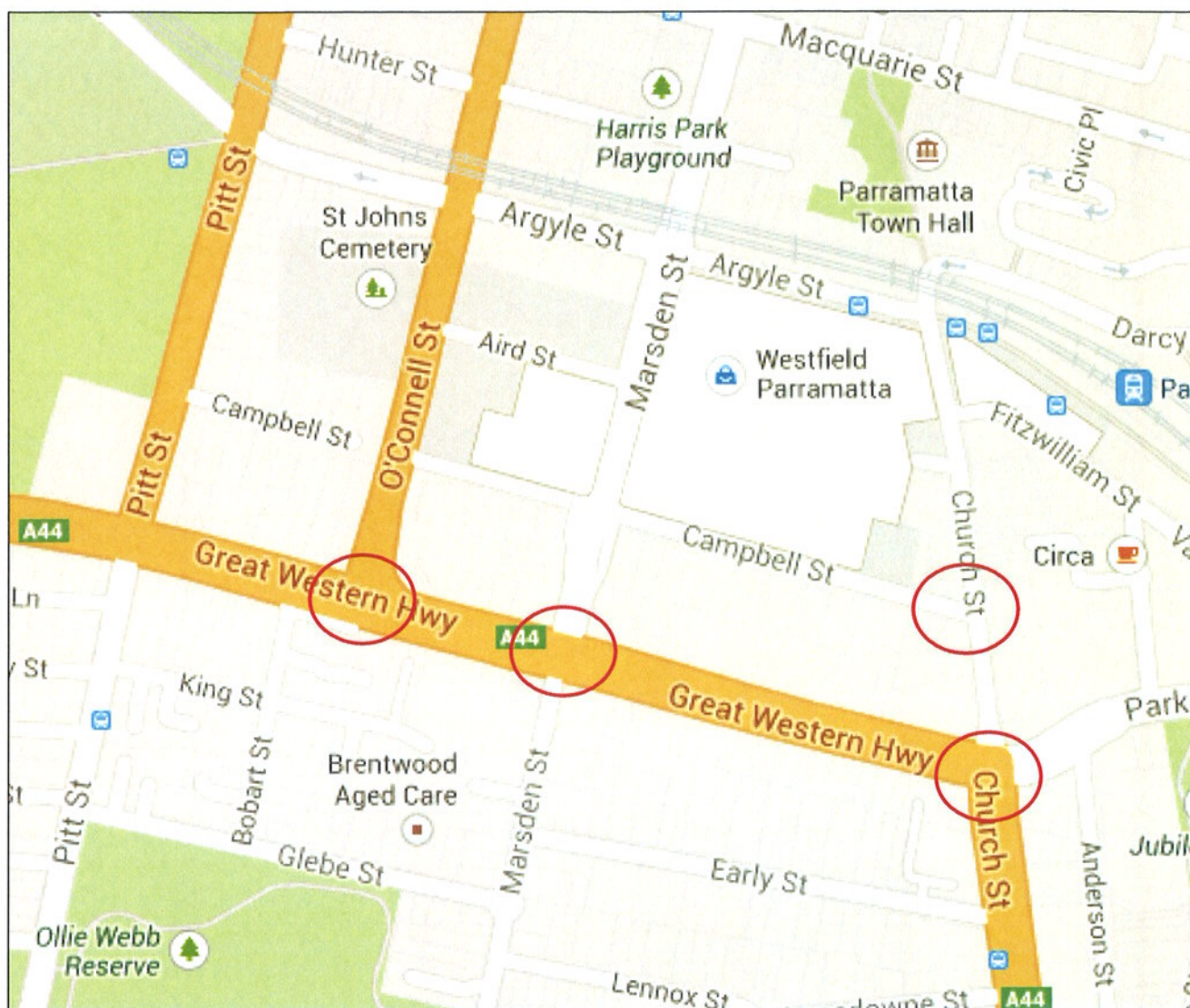


Figure 11: Location of Intersection Upgrade works

The modelling submitted with the PPR demonstrated that the proposed development would result in significant further deterioration of the surrounding road network. However, with the upgrade of the 4 intersections above, overall traffic flows in the area would be improved. The results of the modelling for the PM peak (the worst affected time of day) are shown in **Table 6**.

Table 6: Traffic Modelling Results: Intersection Level of Service and Average Delay (seconds) (source: Arup's Independent Review of Proponent's PPR)

Intersection		2012 Base		2016 Base		Scenario 1		Scenario 2	
		LoS	Average Delay	LoS	Average Delay	LoS	Average Delay	LoS	Average Delay
1	Pitt Street - Great Western Highway	F	449	F	440	F	461	F	332
2	O'Connell Street - Great Western Highway	F	290	F	304	F	284	F	204
3	Marsden Street - Great Western Highway	F	235	F	240	F	251	F	217
4	Church Street - Great Western Highway	F	187	F	245	F	325	F	199
6	Marsden Street - Campbell Street	E	70	E	70	F	77	E	70
7	Church Street - Campbell Street	E	57	E	57	D	49	D	50
8	O'Connell Street - Aird Street	B	27	B	27	B	27	B	26
10	Church Street - Fitzwilliam Street	C	31	C	31	C	37	C	35
11	Argyle Street - Pitt Street	C	32	C	32	C	35	C	32
12	O'Connell Street - Argyle Street	C	36	C	36	C	36	C	35
13	Marsden Street - Argyle Street	C	29	C	29	C	38	C	35
14	Church Street - Darcy Street	C	31	C	31	C	31	C	30
19	O'Connell Street - Macquarie Street	F	146	F	146	F	143	F	145
20	Marsden Street - Macquarie Street	D	44	D	44	D	46	D	48

Council and RMS's Position

As a result of the findings of the modelling submitted with the PPR, the RMS and Council initially suggested that the proponent should be responsible for the provision of all four intersection upgrades to mitigate the adverse traffic impacts of the proposal.

The proponent raised a number of concerns with this approach, and in particular with the provision of the intersection upgrade at Great Western Highway / Church Street / Parkes Street. This intersection required significant land acquisition for road widening which the proponent did not have the authority to acquire and in addition, construction costs were estimated by the proponent to be around \$1.5 million which they considered an unreasonable financial burden. The proponent did, however, agree to funding the remaining two intersection upgrades on The Great Western Highway which they estimated to cost \$80,000 in total as well as the Campbell Street upgrades which have not been costed.

The RMS and Council subsequently advised that they would no longer pursue the provision of the Great Western Highway / Church Street / Parkes Street intersection upgrade, as the upgrade of the

intersection could form part of a planning proposal and potential future development of a large site immediately adjoining that intersection.

However, the RMS and Council have carried out more detailed design work on the Marsden Street intersection and advised that total costs for that upgrade (including works along the Great Western Highway to the intersection with O'Connell Street) would cost substantially more than the \$80,000 estimated by the proponent. Initial cost estimates by RMS indicate a potential cost of around \$700,000, although it was acknowledged that the figure was conservative and the works may be able to be delivered by the proponent at less cost. RMS and Council have advised that they consider it essential for the proponent to deliver this intersection upgrade (as well as the Campbell Street upgrades) at no cost to the RMS or Council prior to the occupation of the retail development.

The Proponent's Position

The proponent has advised it agrees to providing the Marsden Street / Great Western Highway intersection upgrade, but only if the Section 94A contributions otherwise payable be reduced from 3% of the project cost to 2.9% (that is, a reduction of around \$405,000) to partially offset the cost of the intersection upgrade works. It will also provide the Campbell Street upgrades as was always intended.

The proponent argues that as the proposed development will only contribute 5 - 10% of additional traffic through the intersections, it is unreasonable to expect the proponent to provide 100% of the cost of the Marsden Street intersection upgrade in addition to the \$12 million payable through s94A contributions.

Department's Assessment

The proposed development, and in particular the retail use, will contribute significantly more vehicle movements to the locality than other commercial or residential development in Parramatta. The modelling indicates that without the provision of the four intersection upgrades, the development would result in worsening traffic impacts with extended queuing times and congestion in an area that is already operating at the worst level of service.

The Department therefore considers that the proposal should adequately mitigate against these impacts through appropriate road network infrastructure upgrades.

However, as the Great Western Highway and its associated intersections are State Government assets under the control of the RMS, the Department accepts the RMS's position that only the Marsden Street / Great Western Highway intersection upgrade is necessary in this case, as the RMS will seek other necessary intersection upgrades through alternative means.

The Department also agrees with the RMS that the Marsden Street / Great Western Highway intersection remains essential in order to mitigate the adverse traffic impacts of the proposal as demonstrated by the modelling. As such, conditions are recommended requiring the provision of the intersection upgrade prior to occupation of Stage 1. Conditions are also recommended requiring the upgrade at Campbell Street upgrades as was always intended by the proponent.

The Department does not consider it appropriate, however, to reduce the Section 94A developer contributions payable to offset of the cost of the infrastructure works to the proponent. Mitigation measures necessary to offset the impacts of the proposal are considered to be independent of developer contributions which are aimed at providing public domain and civic improvements to the locality. While it is true that the proposed Marsden Street intersection works will provide an improvement to the functioning of that intersection above the level necessary to mitigate against the impacts of the development, any such additional improvement to the functioning of this intersection will be more than offset by additional adverse impacts to the functioning of the Church / Parkes / Great Western Highway intersection that will not be mitigated against by the developer. More

importantly, however, it is not considered appropriate to offset Section 94 contributions in lieu of improvements to State owned infrastructure and assets. Section 94 functions to provide funding for local government to make improvements to Council owned assets such as public domain improvements and civic works and can not be used to fund improvements to State infrastructure. As such, conditions are included in the recommendation requiring payment of Section 94A contributions at the rate of 3% of development cost, in accordance with Council's contribution plan.

Overall, the Department is satisfied that with the provision of road infrastructure upgrades as recommended, the proposal will not result in a significant adverse impact on the function of the road network.

5.2.2 Parking Provision

Holroyd Council has raised concerns that the proposal does not provide sufficient on-site parking and therefore may result in an exacerbation of overflow on-street parking problems within Holroyd LGA. Parramatta City Centre LEP 2007 sets maximum parking rates for development, resulting in a maximum additional parking requirement of 1,400 car parking spaces (1050 retail spaces and 350 commercial spaces). The application proposes a total of 568 additional spaces (468 retail and 100 commercial).

The Department considers that the proposed number of parking spaces is appropriate in this case and is consistent with planning objectives to encourage non-car modes of travel. The site is immediately adjacent to Parramatta Railway Station and bus interchange and therefore has excellent access to public transport. Information submitted by the proponent indicates that a high proportion (46% of shoppers and 62% of employees) visiting the site travel there by means other than private vehicle. Surveys also show that the existing carpark did not fill to capacity during the surveys, despite 3 hours of free parking being available.

The RMS and Transport for NSW support the reduced rate of car parking provision for the development.

Streets immediately surrounding the site are controlled by local parking restrictions to manage on street parking and as the site is more than 1km from the boundary with Holroyd LGA, the Department considers it unlikely that there would be significant on street parking impacts on that locality.

5.2.3 Public Transport Impacts

As described above, the site has excellent access to public transport, being immediately adjacent to Parramatta Railway Station and bus interchange areas, and reduced parking numbers on the site will encourage non-car modes of travel. The proponent's PPR included an assessment of the impact of the proposal on non-car modes of travel, having regard to the existing capacity on the bus and rail network. The study demonstrated that there was spare capacity on existing public transport services (buses and trains) to accommodate additional demand generated by the proposed development. The proponent also included a commitment to prepare a detailed Transport Accessibility Plan to inform visitors and workers of non-car modes of transport to the site. The PPR also included improvements to the Taxi pick-up area, as was requested by Council and the Department.

The application was referred to Transport for NSW and Railcorp (Sydney Trains). Railcorp raised no issue with the proposal, subject to standard conditions for works adjacent to the railway line. Transport for NSW originally requested a more detailed Traffic Management and Accessibility Plan (TMAP), but following more detailed information submitted with the PPR to address the requirements of a TMAP, no further issue was raised in this regard.

The main outstanding issue for Transport for NSW is the traffic impacts of the proposal and the potential for a deterioration of intersection performance to impact on bus services, particularly at the Argyle Street / Pitt Street / Park Parade intersection. As shown in **Table 6** in **Section 5.2.1** above, overall intersection performance at that intersection during the PM peak will remain at 'satisfactory'

levels of service (LoS 'C') regardless of whether modelled intersection upgrades are carried out or not. However, during the morning peak it is acknowledged that there will be a deterioration in the performance of that intersection from level of service 'C' (satisfactory) to level of service 'F' (unsatisfactory) if none of the modelled intersection upgrades are provided, and this impact will only be partially reduced to a level of service 'E' (at capacity) by the modelled intersection upgrades discussed above in **Section 5.2.1**. The Department acknowledges that while intersection performance in that particular case will be reduced, the operation of other nearby intersections would be improved as a result of the planned intersection upgrades, and as a result, the overall road network would function better, resulting in a net improvement to bus operations. As such, it is not considered that nospecific mitigation measures are required in relation to bus operation impacts.

Other issues raised by Transport for NSW related to the need for a construction traffic management plan to manage impacts to bus services during the construction phase and the need to remove bicycle parking from one location to ensure clear vehicle sight lines. Recommended conditions have been included in the Instrument of Approval to this effect.

5.3. Built form

The proposal seeks to extend the existing shopping centre by providing an additional retail level, three car parking levels (Stage 1) and also a 20-storey office tower (Stage 2). The Department considers that the key issues relating to the built form are the density of the development; the relationship of the retail additions with the surrounding area; and the height, bulk, scale and location of the commercial tower.

5.3.1. Density of the development

The Parramatta City Council LEP 2007 (PCCLEP 2007) seeks to control the density of development by imposing a maximum FSR of 4.2:1 for the entire site (refer to **Figure 12**).



Figure 12: Floor Space Ratio Map (Source: PPCLEP 2007)

The site has an area of approximately 61,100m² and the existing FSR for the site is 4.5:1. In total, the overall retail and office extensions proposed by the EA result in a FSR of 6.48:1 (5.9:1 retail / 0.58:1 commercial), which exceeds the prescribed FSR of the PCCLEP 2007 by 2.28:1. Concern regarding the application site exceeding the prescribed FSR was raised in public submissions. Parramatta City Council has highlighted concerns in relation to increased retail density on the site (discussed below in **Section 5.3.2**), although has raised no concerns with the proposed floor space of the commercial tower.

The proponent contends that the primary purpose of FSR development standard is to control overall bulk and scale of buildings and the focus should therefore be on the appropriateness of built form not numerical compliance. The proponent also notes that the retail component of the proposal, including the proposed car parking, has a volume that fits within the permitted LEP building envelope (i.e. 36 metre height maximum). With reference to the FSR calculation, the proponent highlights that on-site car parking represents approximately 50% of assessable GFA and if this parking (required to meet Council requirements) is excluded from the calculation the FSR reduces from 6.48:1 to 2.95:1. Furthermore, adjacent land to the east and north, which is a similar distance from the transport interchange, may be developed to an FSR between 6:1 and 8:1.

The Department considers that despite the non-compliance with the FSR controls, the proposed FSR is acceptable given that:

- the height and bulk of the retail and car parking (Stage 1) extensions are below the maximum building envelope height for the site as discussed in **Section 5.3.2**;
- the height, bulk and scale of the resulting tower building envelope (Stage 2) is acceptable within the context of the locality, subject to modifications and future assessment requirements as discussed in **Section 5.3.3**;
- the density of the proposal would not result in any unacceptable impacts on the surrounding road network or the amenity of adjoining residential properties as discussed **Sections 5.2 and 5.6**; and
- the proposal contributes to a number of the wider State strategic planning objectives by expanding and improving an existing retail facility which is close to a large residential population and well served by public transport.

5.3.2. Built form of Retail Additions

In assessing the built form of the proposed retail additions, the Department has considered the overall bulk and scale of the additions, as well as, finer grain design issues of the façade design and street activation.

Bulk and Scale

As discussed above, the floor space ratio as proposed for the site is considered to be acceptable. No issues were raised by Council or the public in relation to the proposed retail and carpark extensions in terms of bulk, scale, height or setbacks. The height and setbacks of the Stage 1 additions are generally in line with local planning controls. Under the LEP, a height control of 36 metres applies to the site. The Stage 1 proposal would generally be no more than 29 metres in height and would have a maximum height of 34.14 metres.

Street and boundary setbacks of the proposed additions are also generally consistent with controls set out in the DCP, with some minor encroachments at upper levels along Campbell Street, Marsden Street and O'Connell street as depicted in **Figure 13**. It is noted that the DCP controls, such as the street setbacks, are not given any weight under the former Part 3A provisions and were not listed in the DGRs as a policy or guideline to be addressed. As such they do not strictly apply to the assessment of the application. Further, since the PPR submission, the proponent has suggested setting back part of the additions further from the street to address overshadowing of a heritage item (refer to discussion in **Section 5.4.2**) so that the extent of encroachments is further reduced (refer **Figure 13**). The remaining encroachments do not result in any significant shadow impacts to nearby

residential properties, and with the provision of further façade design and material details as discussed below, no adverse visual impacts are considered to arise from the minor encroachments.

On this basis, the bulk and scale of the proposed retail additions is considered to be acceptable.

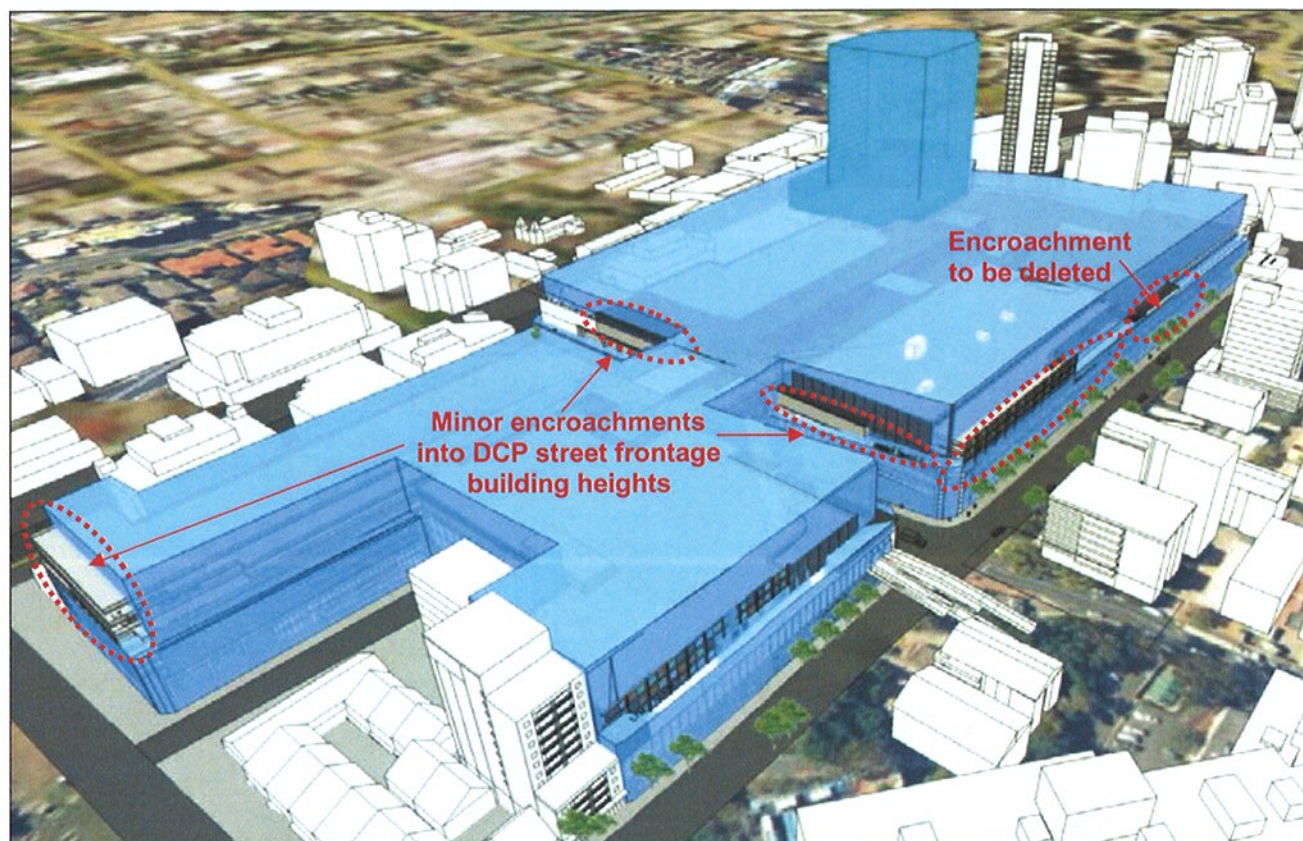


Figure 13: Proposed building envelope showing encroachment of DCP street frontage building height controls (Source: Proponent's Environmental Assessment)

Façade Design and Street Activation

The existing design and form of the Westfield Shopping Centre is the result of its staged growth/expansion since the 1970s. The buildings that comprise the East and West Centre, which form the application site, are introspective and the shopping centre generally turns its back to the street. The external treatment of the centre, for the most part, reflects this and there are only a few points of entry and little upper level fenestration.

The public domain and streetscape along Marsden, Aird and Campbell streets are especially low in amenity, generally presenting only blank facades or carparking and loading areas, and are highly overshadowed due to the orientation and the existence of development above the roadway on Marsden Street and Aird Streets (refer to **Figures 5 and 14**).

A large section of the Argyle Street façade also presents blank walls at the pedestrian level, creating a poor pedestrian environment for the Argyle Street bus interchange area (refer **Figure 15**). It is only at the corner of Church and Argyle Streets and along Church Street that the shopping centre presents a high level of street activation, and even then, a number of windows present as obscured for service provision or to suit the needs of the adjoining retailers (refer **Figure 16**).



Figure 14: Existing Campbell Street façade (source: Google Maps)

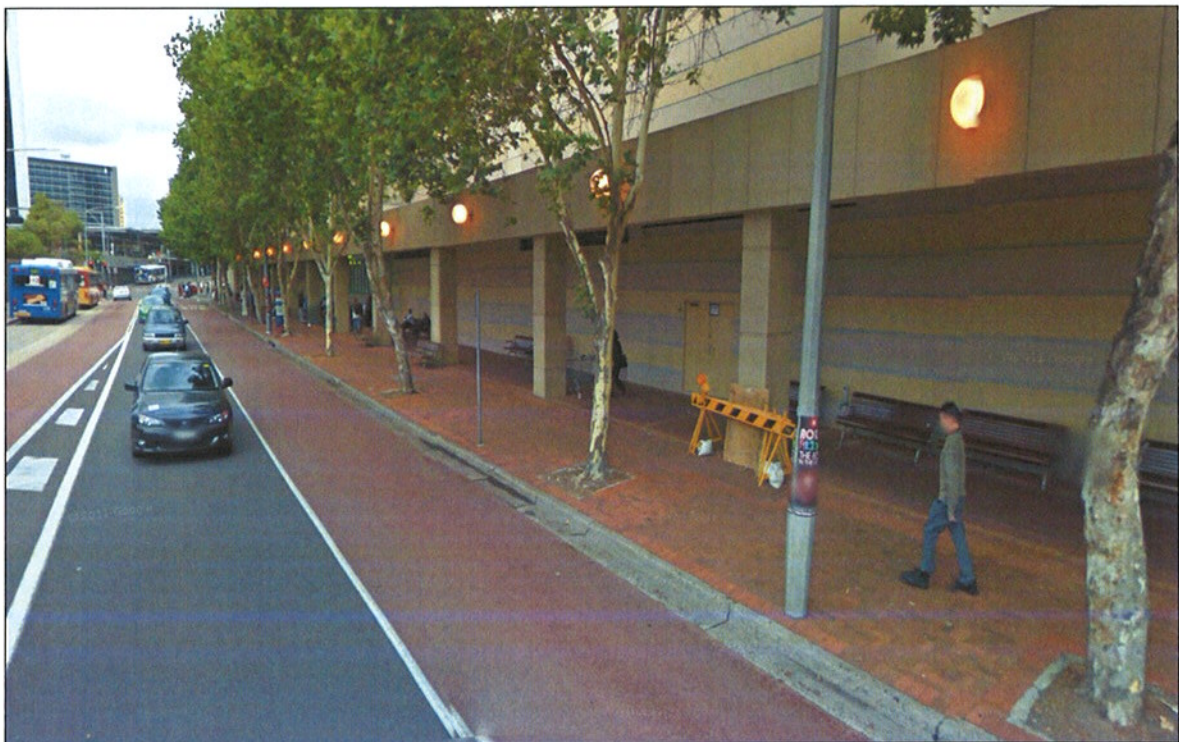


Figure 15: Existing Argyle Street facade adjacent to bus interchange area (source: Google Maps)



Figure 16: Existing Church Street facade with obscured windows (source: Google Maps)

Council Concerns

The need to rectify or improve on these existing shortfalls is a key concern raised by Parramatta City Council. It argues that adding more density to an existing inward facing centre without improving permeability will only exacerbate the existing isolation and separation of the site from the surrounding area. Council suggest that all external walls especially at ground and first floor levels should be renovated with fine grain and active frontages to all ground floor areas, and in particular to Church and Argyle Streets and the bus interchange to improve integration with the surrounding public domain. Facade openings and through-site links are recommended to allow the building to engage with the city rather than block views inside and out.

Council has also raised concerns that there are no detailed drawings or schedule of materials to provide certainty about the actual final appearance of the building and, therefore it is difficult to support the proposal in terms of architectural and urban design merit.

Proponent's Response

The proponent argues that it is difficult and cost prohibitive to make significant changes to the fabric of the building and that many of the existing 'inactive' frontages are unable to be easily altered given that no major redevelopment is proposed at the ground and first floor levels, and as these facades adjoin important service areas and fire safety infrastructure. The proponent also argues that the site already provides permeability for pedestrians, and that as it is not surrounded by retail areas, and has no significant development to the south, west and east, additional permeability is not justified.

However, the proponent has agreed to make some improvements in terms of street activation. The main improvement would be to the Argyle Street façade adjacent to the bus interchange and would include new openings to a potential future café and new department store window display windows (refer **Figures 17 and 18**). The proponent originally advised that these changes could only be provided at Stage 2 and would be subject to the tenant's agreement, but subsequently advised that although not preferable, the changes could be brought forward to within 24 months of completion of the Stage 1 works.

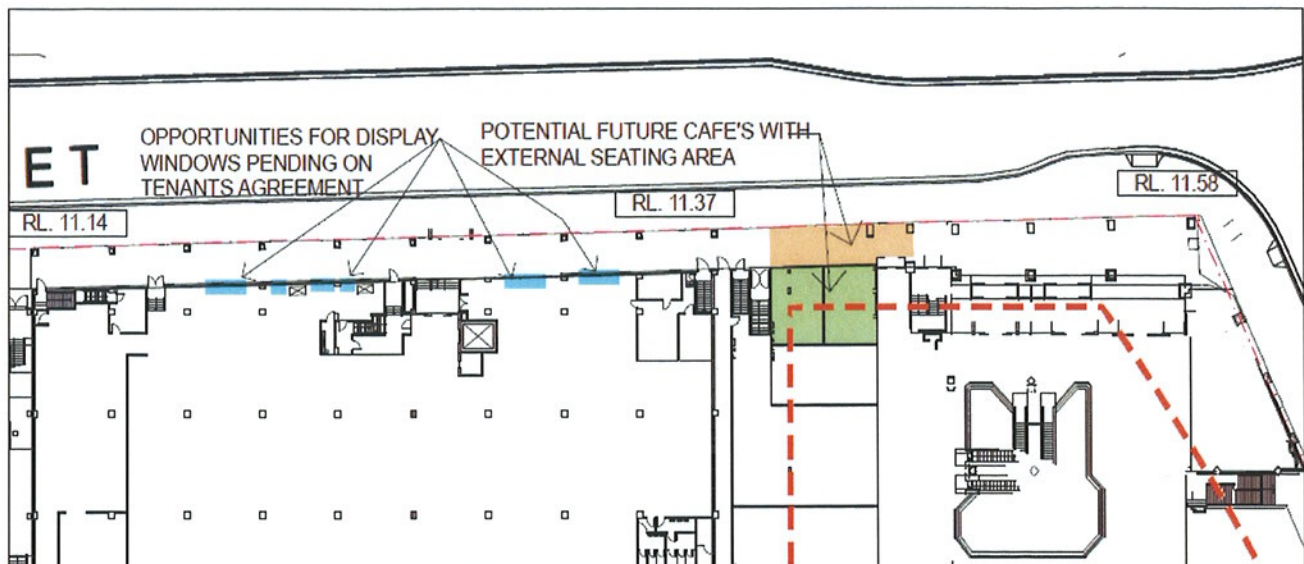


Figure 17: Proposed new ground floor openings to Argyle Street (source: Proponent's EA)

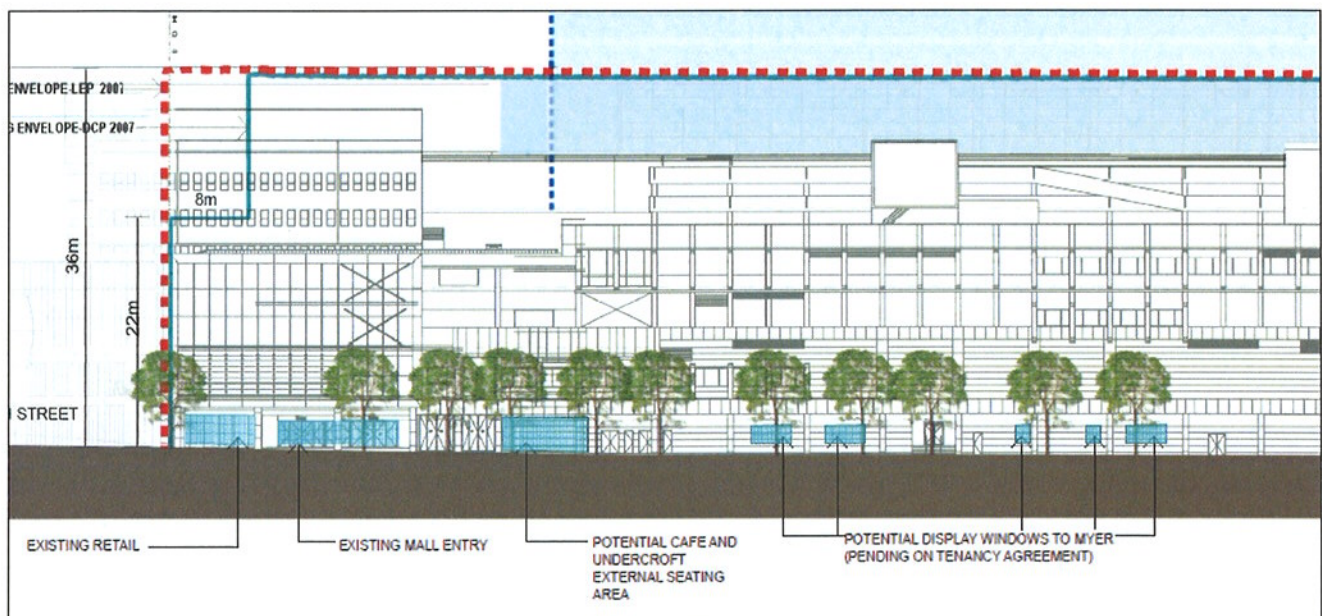


Figure 18: Proposed new ground floor openings to Argyle Street (source: Proponent's EA)

No changes are proposed to the Church Street façade and it is proposed to retain the existing inactive frontages (refer **Figure 19**). The proponent has, however, advised that there may be upgrades to this facade as part of Stage 2 in order to facilitate the integration of the future office design and façade of the retail podium, although it is noted that the plans submitted with the Concept Plan application do not accommodate for any changes at the retail podium in this regard.

The proponent argues that the nature of such changes cannot be ascertained until the design of the tower is prepared following the design competition, and that any changes to the façade imposed now may be inconsistent with the future design or may unnecessarily constrain the design options for the tower.

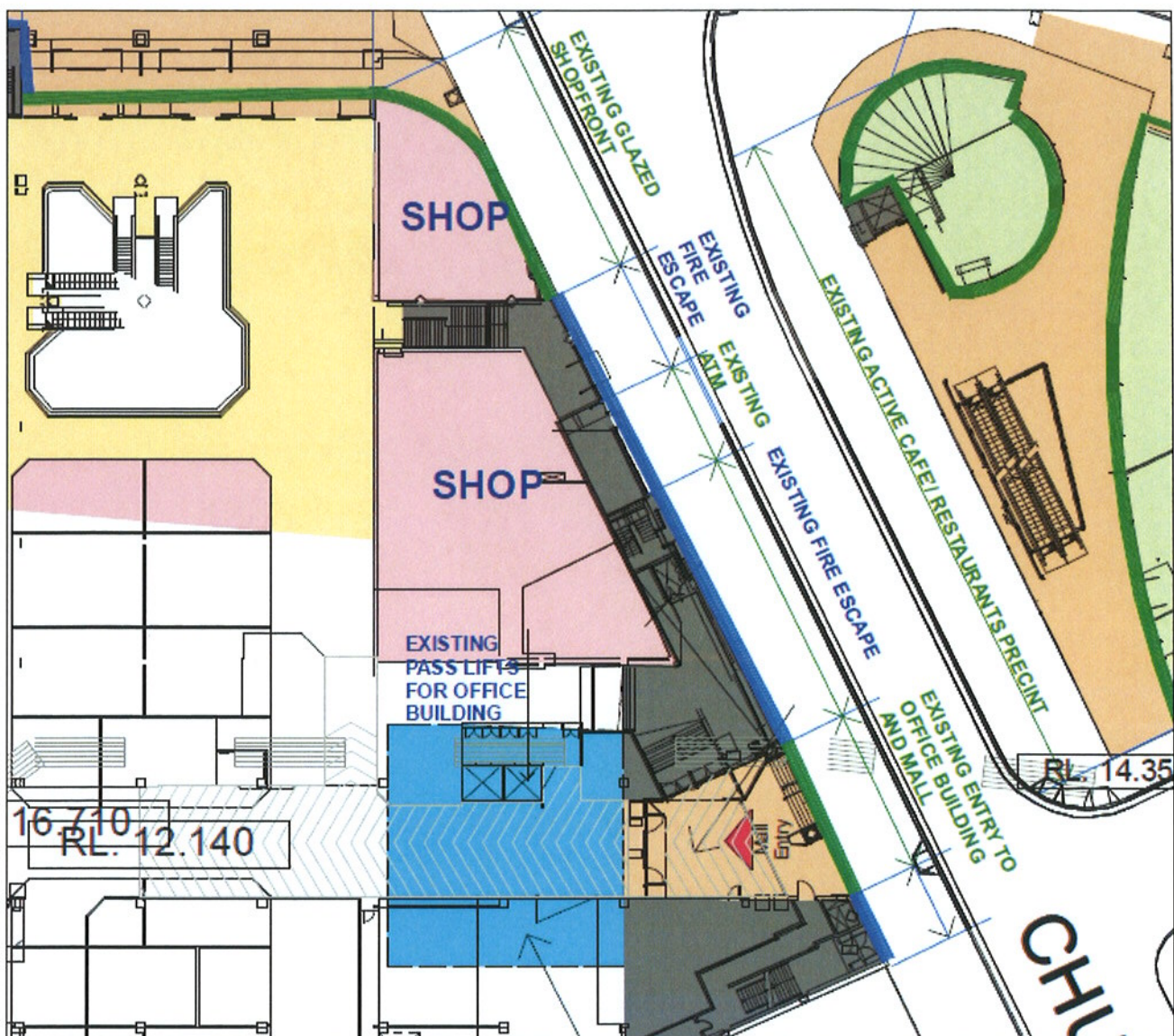


Figure 19: Existing inactive façades to Church Street retained (source: "Street Activation Concept Floor Plan" in Proponent's PPR)

Department's Assessment

The DGRs for the application required that the EA provide for activated street frontages along Church and Argyle Streets. Furthermore, in its request for a PPR, the Department raised this issue as a concern with the proponent and requested that consideration be given to addressing the impact of the inactive facades at ground level and alternative treatments to activate the facades such as insertion of shopfronts and access points.

The Department acknowledges that provision of active frontages to all elevations of the entire site is not justified by the scope of the works, and it is not necessary or desirable to provide extensive openings and shopfronts on frontages adjoining residential areas such as Campbell Street. However, it is considered that Church and Argyle Streets are key frontages for the site, being the site's main address and interface with the CBD, and being heavily trafficked by pedestrians.

While activation of these facades would require changes to some back-of-house service areas and fire escapes, the scope of such works is not considered to be extensive in the context of the size of the entire site and the capital investment value of the proposed retail additions in Stage 1, estimated at \$200 million.

It is predominantly the proposed retail additions (rather than the commercial tower) which would generate additional pedestrian activity in the vicinity of the site, and as the facades involved relate to the retail component of the site, it is considered appropriate that all façade activation changes to be provided as part of Stage 1 of the development.

It is not considered appropriate to delay the changes to Stage 2, as proposed by the proponent, as there is no timeline or guarantee that the works will ever be undertaken. Whilst it is acknowledged that the design of Stage 2 may have some impact on the layout of the retail area below it, for example, due to the insertion of future supporting columns for the office tower, these will be well setback (around 8 metres) from the facades and will not impact on actual façade design changes. Furthermore, it is considered that with good design and planning at Stage 1, it should be possible to make changes to the ground floor plan that results in active street frontages as part of Stage 1, and which also provides enough flexibility for a future floor plan to accommodate supporting columns and any other changes such as new lifts or entry lobbies associated with the tower.

A condition is therefore recommended that the works to Argyle Street depicted in **Figures 17 and 18** above are provided as part of Stage 1, and that amended plans be submitted and approved by the Director-General incorporating activation of the entire Church Street façade at the footpath level and any necessary redesign of existing adjoining services and fire escapes.

Parramatta City Council suggested that the commercial tower component in Stage 2 should engage directly with the street by incorporating an entrance forecourt into the design. The concept plans do not provide for the provision of a future ground floor lobby, and the Department does not consider that a ground floor commercial forecourt or lobby is essential. With appropriate upgrades to the façade design as discussed above, it is considered that an acceptable outcome for the streetscape would be achieved if just the retail component engages directly with the street, providing there is appropriate access through the retail area to the commercial "sky lobby" above the retail podium.

In terms of the façade design of the proposed upper floor level extensions, the Department considers that while the overall design of the elevations appears to be acceptable, further detailed drawings and schedule of materials is required to provide certainty about the actual final appearance of the building. A condition is therefore recommended requiring the submission and approval by the Director-General of such details prior to the issue of a Construction Certificate. This would ensure the proposal achieves a high quality design outcome for the site.

5.3.3. Built form of the Commercial Tower

As indicated at **Table 1**, the height of the existing shopping centre building at the corner of Church and Argyle Streets is 17 metres, which equates to approximately 5 storeys. Above that currently is a 3-storey office building setback from the main façade line on Church Street.

The Concept Plan proposes a new commercial tower in place of the existing commercial building. As proposed, the office tower envelope would have a maximum height of RL112.14 or 83 metres above podium level, equating to 20 storeys (at 4.1m per storey). The proposal therefore results in a combined maximum height of 100 metres or approximately 25 storeys, which is 64 metres above the PCCLEP height control of 36 metres.

The proposed building envelope is divided into a 5-storey plinth with a tower above. The tower and plinth would be setback from the existing building lines on Church and Argyle streets as shown in **Figure 20**.

There has been some confusion over the proposed size of the tower envelope area. The proponent has advised that the figures for building envelope and building floor plate area provided in the EA and PPR were incorrect and when measured correctly, a smaller building envelope and floor plate is in fact proposed. **Table 7** provides a comparison of the original and now corrected figures. It is noted

that floorplate is defined in defined in Parramatta City Centre DCP 2007 to mean “the gross floor area (GFA) per floor” and excludes areas such as external wall thicknesses, plant rooms, lifts and stairs.

	As set out in EA and PPR		As advised by Proponent November 2013	
	Building envelope area	Building floor plate area (GFA)	Building footprint / envelope area	Building floor plate area (GFA)
Levels 1 – 5 above the podium	3000m ²	2500m ²	2500m ²	2250m ²
Levels 6 - 20	2000m ²	1600m ²	1660m ²	1480m ²

Table 7: Proposed building envelope and floor plate areas

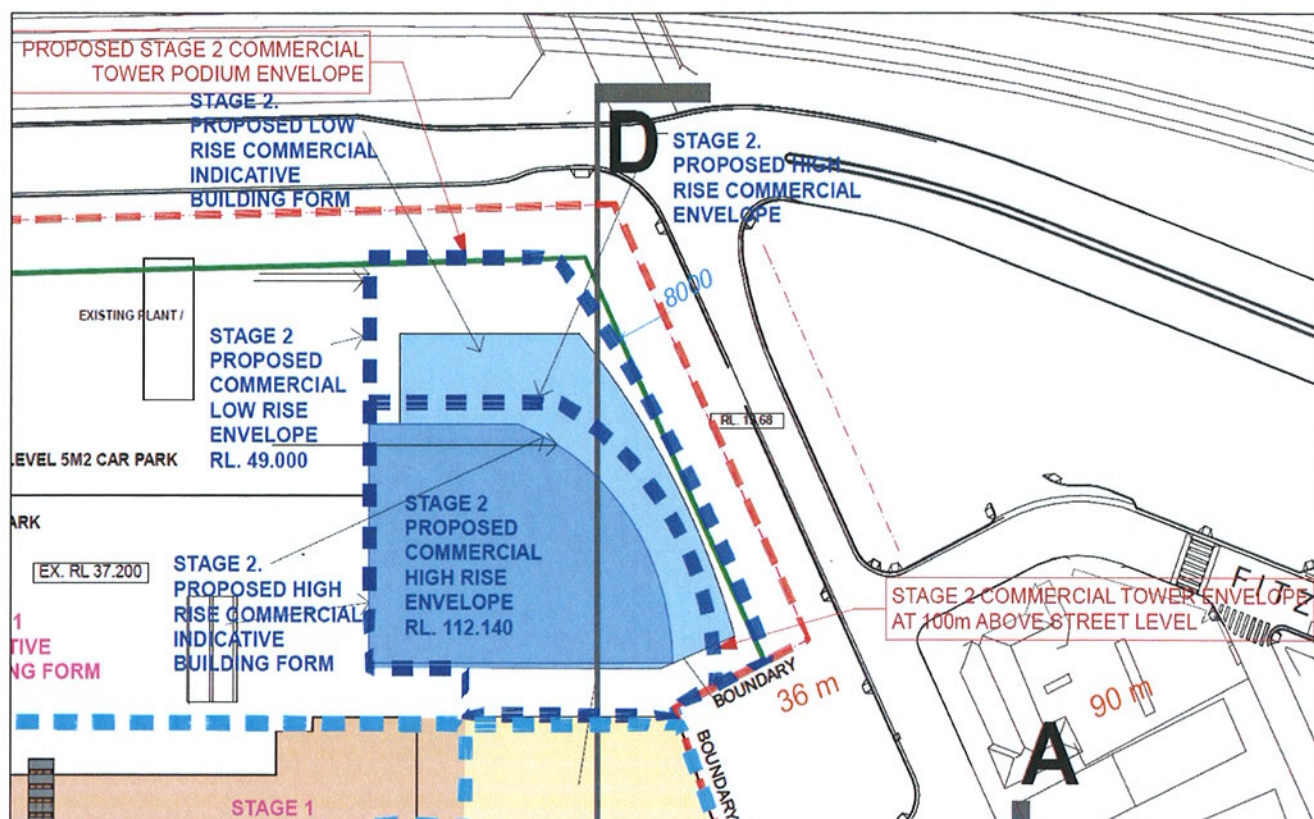


Figure 20: Tower building envelope (Source: Proponent's Environmental Assessment)

Note that the plans indicate both a 'proposed envelope' (shown dotted) and an 'indicative building form' (shown coloured blue). The photomontages and 3D diagrams throughout this report demonstrate the 'indicative building form' and not the full extent of the proposed envelope. Examples of the indicative building form are shown in **Figures 21 and 22** below.

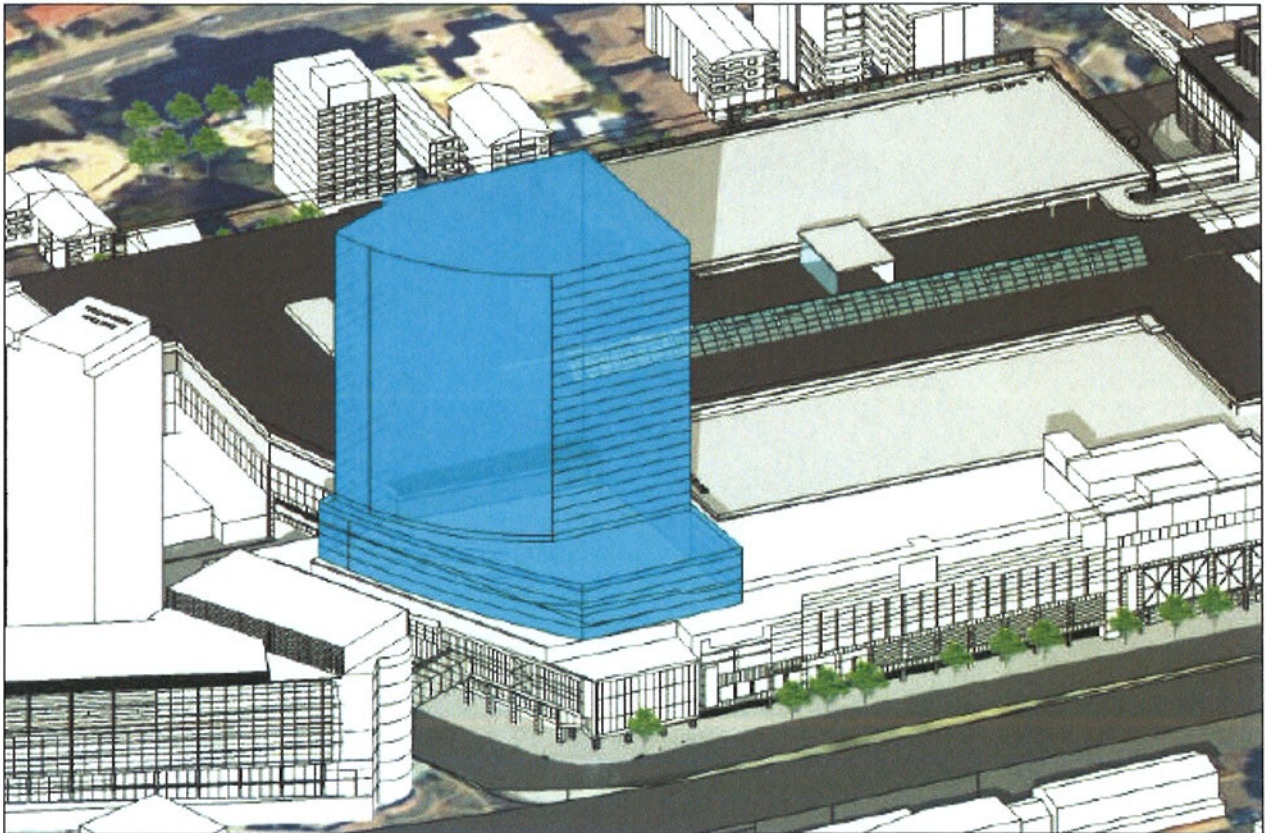


Figure 21: 3D view of the indicative building form (source: Proponent's EA)



Figure 22: Rendered photomontage of indicative building as viewed from Church Street Plaza (State heritage listed Town Hall to the left of photo; St Johns Cathedral just out of picture to the right) (source: Proponent's EA)

Council and Heritage Office Concerns

Council has advised that while it supports a commercial tower in this location, it has concerns about the form and scale of the proposed tower. Specifically, it submits that the proposed floor plate is excessive and will lead to an inappropriate urban form at a future stage. Based on the figures set out in the EA and PPR, it recommends a maximum building envelope of 1,800m² and maximum floor plate of 1,400m² to ensure an appropriate visual bulk and scale, promote sustainability and internal amenity. It also recommends that the 5-storey plinth or podium levels which create a tiered effect should be deleted in favour of a simpler tower form, and that part of the tower component should engage directly with the street without any setback and by incorporating an entrance forecourt into the design.

To offset the recommended reduction of floor space at each level, the Council advises it would support an increase in the height of the tower by an additional 20 metres or 5 storeys.

The Office of Environment and Heritage (OEH) also raised concerns about the bulk and scale of the proposed office tower on the basis of its visual impacts to surrounding heritage buildings. It recommends reducing the bulk and scale of the proposed commercial tower, without increasing the height to reduce the dominance of the tower on view corridors and setting of landmark heritage items in the vicinity, in particular, the State-listed St John's Cathedral, Parramatta Town Hall and Parramatta Park. Heritage issues are discussed in detail in **Section 5.5** below.

Proponent's Justification

The proponent has advised that the tower is designed to be a high rise landmark tower, delineating the southern gateway to the Parramatta CBD. The height of the tower was designed to be consistent with the adjacent tower building at 140 Church Street and not to protrude further into the skyline than the existing nearby buildings.

In response to concerns raised by Council and the Department in relation to floor plate size and building bulk, the proponent prepared 3D diagrams illustrating a comparison between the proposal as submitted (1,660m² building footprint) and an alternative building form with the building footprint reduced to 1,400m² and height increased to 120m (refer to **Figure 23**).

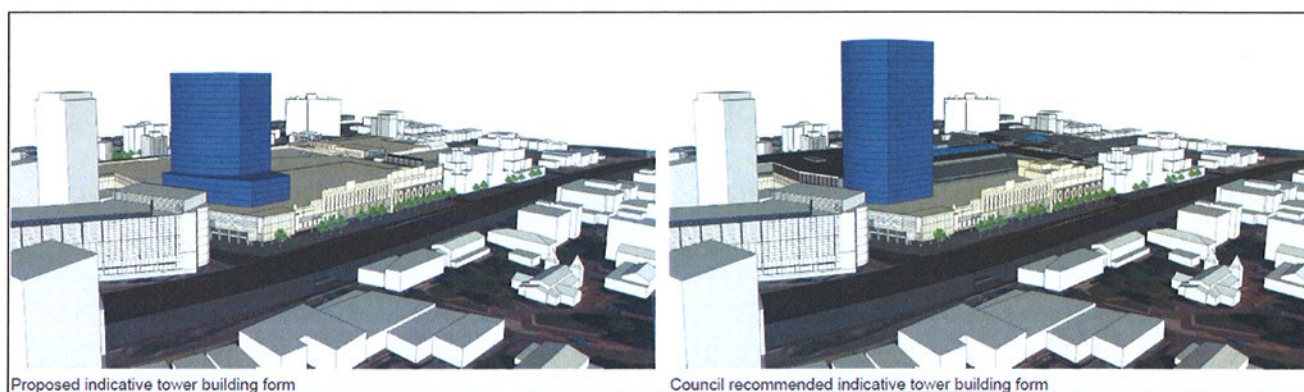


Figure 23: Comparison of proposed and Council recommended indicative buildings
(source: proponent's PPR)

The proponent submits that the difference between the two envelopes in terms of bulk and scale is modest, and that the taller slimmer version would in fact be more noticeable as it encroaches further into the skyline. It also advises that the tower would be more noticeable from the World Heritage listed Old Government House, and this may have implications for future approval requirements under the EPBC Act, while no issues arise with the current proposal (as discussed in **Section 5.5.2** below).

The proponent further advises that the proposed office tower has been designed to provide floor plates suitable for major businesses and government agencies, and that a significant reduction in floor