



Our Ref: 17124

4th September 2017

The Secretary  
Department of Planning and Environment  
GPO Box 39  
SYDNEY NSW 2000

Attention Mr Ben Lusher Director Major Projects Assessment

Dear Secretary

**Re: Major Project Application MP10\_0068 Proposed Modification of Concept Plan Approval for Retail and Commercial Additions at Westfield Shopping Centre, Church Street and Argyle Street, Parramatta.**

We write on behalf of Scentre Group (formerly Westfield Pty Ltd), the proponent for proposed retail and commercial additions pursuant to Major Project Application MP10\_0068. Concept Plan Approval for this development was issued on 20<sup>th</sup> February 2014. The proponent is seeking a modification of the approved Concept Plan relating to the office tower to provide for an increase in building height, floor space and tower floor plate for the proposed commercial tower and relocation of the tower further to the west. The purpose of our correspondence is to provide an outline of the proposed modification and request Secretary's Environmental Requirements (SEAR's) for the modification.

The proposed commercial office tower is intended to be a prestige landmark 5 GreenStar office tower capable of attracting major private or government tenants to Parramatta. The tower envelope, as originally proposed, provided for some 35,000m<sup>2</sup> of gross floor area, in a building of 20 office levels designed for contemporary A Grade corporate office accommodation needs.

The Concept Plan approval, allowed for additional building height, but with significantly reduced maximum floorplate size. Since approval of the Concept Plan in February 2014 the proponent has been exploring opportunities in the marketplace to attract suitable international or national corporations to Parramatta, to occupy the planned office tower. Feedback from this process indicates that such major prospective tenants require larger floor plates and for proposals involving head office functions, require total floor space well in excess of the 35,000m<sup>2</sup> that has been approved in the Concept Plan.

Scentre Group is advanced in its negotiations with a national corporation to occupy the proposed tower building, subject to approval for floor plates and increased floor space. This will necessitate a change to the approved office tower building envelope.

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Scentre Group has appointed Woods Bagot Architects to provide architectural and urban design advice in relation to the proposed modification of the approved tower envelope. Woods Bagot is recognised for their architectural excellence and extensive experience designing office towers.

In preparing the revised tower envelope plans for a taller tower with larger floor plates, the design process has identified a number of design changes that are necessary to ensure urban design and environmental impacts are not materially changed, compared to the tower form as originally approved. These matters arising from enlarged floor plates and increased building height are summarised as follows:

- Moving the tower to the west increases building separation between the proposed office tower and the nearby high rise Aspire residential tower, proposed to be developed at the western end of Parramatta Square.
- The now proposed office tower location provides a suitable termination to the southern vista down Church Street and, by providing greater separation to the planned Aspire tower, creates a southern gateway to the CBD. Greater separation between buildings in this location also enhances the building's integration into the city skyline.
- Relocation of the tower further west facilitates a greater level of street activation and pedestrian permeability along Argyle Street and is complemented by the new location of the commercial lobby. The proposed design will include new façade treatment integrated with the proposed tower, facilitating architectural expression of the tower all the way down to street level and positively transforming the streetscape.
- Locating a larger, taller tower as proposed in this modification, in the currently approved location has potential to create additional overshadowing of the west facing elevations of residential towers located on the eastern side of Church Street. Moving the tower envelope to the west and reshaping the building envelope ensures there is minimal overshadowing of apartment buildings on the eastern side of Church Street, compared to the approved Concept Plan for a 25 storey tower, adjacent to Church Street.
- Improved building integration means reduced impact on character and built form context of the site and locality. This in combination with a location further to the west, minimises overshadowing onto adjacent residential towers on the eastern side of Church Street and optimises access to natural daylight.
- The large lobby and lift/stair/service core required for the office tower, if located at the corner of Argyle and Church Streets, will significantly compromise the ability to activate and rejuvenate the corner of Argyle and Church Streets. By relocating the tower it is possible to redefine the Argyle and Church Street corner as a new address for world class retail services.
- Further structural investigations have indicated that siting the tower in the original position proposed close to Church Street is not structurally feasible without demolition of the existing 5 level shopping centre in the northeast corner of the site.



No changes are proposed to the Concept Plan approval for the additional retail level or for the approved number of car spaces at this stage. If the requested modification to the office tower envelope is approved, a separate modification application will be submitted to amend the approved plans for proposed retail Level 6 to accommodate the office tower modification. A separate DA will also be submitted for alterations to the existing 5 level retail/parking podium to accommodate the office tower modification, primarily with respect to relocated lift and services core and new ground floor lobby off Argyle Street.

### **Concept Plan Modification**

The modification proposes to amend the approved office tower building envelope to provide for the following concept design changes;

- Increase total assessable commercial gross floor area from 35,000m<sup>2</sup> to 112,000m<sup>2</sup>;
- Increase the number of office and associated levels from 25 to 46 plus a roof plant level.
- Change the tower form to a generally rectangular shape, as illustrated in Diagram 1, below, with a 38.7m wide elevation to Argyle Street
- Increase the maximum permitted building height of 120m above ground level to a maximum of 210m above ground level (maximum RL 220).
- Provide a 2 storey office/lifestyle podium above the existing 5 storey retail podium. The lowest level of the office tower podium is proposed to be integrated with the approved additional retail level, approved as Level 6 in the retail podium.
- Increase maximum office podium building envelope floor area from 1,800m<sup>2</sup> to 5,800m<sup>2</sup> for the 2 office/lifestyle podium levels below the tower.
- Increase maximum office tower building envelope floor area from 1,800m<sup>2</sup> to 3,025m<sup>2</sup> for the 39 office tower floor levels above the office tower podium.
- Relocate the building envelope further to the west to provide an office tower setback of between 80m and 100m to Church Street, with zero setback to Argyle Street.
- Relocate the main office tower lobby and entry from Church Street to Argyle Street
- Improved integration with the podium retail levels and enhanced presentation, activation and access to Church Street and Argyle Street.



**DIAGRAM 1**

**TOWER CONCEPT PLAN**



The requested modification will require changes to some of the Concept Plan approval conditions, as set out below.

Maximum Gross Floor Area (GFA) – Part A Condition A5

Change 35,000m<sup>2</sup> in the second dot point to 112,000m<sup>2</sup>

Building Envelope – Part B Condition B1

In Condition B1(a) change maximum tower building envelope floor plate area to 5,800m<sup>2</sup> for levels 1 to 2 of the proposed office tower located within the podium and 3,025m<sup>2</sup> for tower levels 3 to 41, located above the office tower podium.

In Condition B1(b) change tower building gross floor areas (i.e. excluding vertical circulation such as lifts and stairs and the area of external walls) to 5,000m<sup>2</sup> for Levels 1 to 2 of the proposed office tower located within the podium and 2,750m<sup>2</sup> for tower levels 3 to 41, located above the office tower podium.

In Condition B1(c) change maximum building envelope height from 120 metres to 210 metres above ground level (maximum RL 220).

In Condition B1(d) re-word this condition to require a minimum setback of 80 metres to Church Street for the office tower levels above office tower podium and allow a zero setback to Argyle Street for the office tower podium and the office tower levels above podium.

Built Form – Condition 4 (maximum Floor Plate Size)

Delete the 1,400m<sup>2</sup> limit on building floor plate or gross floor area prescribed in Condition 4 and re-word this Condition to apply only to office floor levels above the office podium and allow a maximum floor plate size of 3,025m<sup>2</sup> and maximum gross floor area of 2,750m<sup>2</sup> for these levels.

Concept sketches and illustrations are separately enclosed illustrating proposed building form, floor plates and layout.

**Environmental and Planning Issues**

Our initial review of the modified concept plans indicates that the primary development assessment issues that will need to be considered include the following matters:

- Built form, primarily tower height, bulk and location.
- Urban design, including context and streetscape.
- Potential increase in overshadowing.
- Potential view impacts.
- Potential heritage impacts.
- Traffic management and parking issues arising from increased office floor space.



- Economic and employment issues relating to meeting office employment needs and floor space demand commensurate with Parramatta CBD's role as the primary CBD for Western Sydney.

## **Conclusion**

Market investigations over the last 2 years indicate that it will not be possible to proceed with the office tower component in the form currently approved in the Concept Plan for the site. Concept sketches have been prepared that provide for a building envelope, height and floor plate that will meet the needs of major corporate and government tenants, a demand that is currently not being met in the Parramatta CBD.

In order to progress the requested modification to the approved Concept Plan for Major Project MP10\_0068, we would be pleased to receive the Secretary's Environmental Requirements for the proposed modification.

Should you require any further information, please contact the undersigned on 9416 9111 or by e mail at [nick@inghamplanning.com.au](mailto:nick@inghamplanning.com.au)

Yours faithfully

**Nick Juradowitch**

**Director**

**Ingham Planning Pty Ltd**