



**Transport  
for NSW**

Mr Andy Nixey  
Acting Team Leader  
Key Sites Assessments  
Department of Planning and Environment  
GPO Box 39  
Sydney NSW 2001

Dear Mr Nixey

**Request for Modified SEARs for Westfield Shopping Centre, Parramatta  
MP10\_0068 MOD 1 (Concept Plan)**

Thank you for your letter dated 8 September 2017 requesting Transport for NSW (TfNSW) provide input to the draft Secretary's Environmental Assessment Requirements (SEARs) for the above.

The suggested additions and changes to the draft SEARs are provided in track changes in the attached draft SEARs for the above.

If you require further clarification regarding this matter, please don't hesitate to contact Para Sangar, Senior Transport Planner on 8202 2672.

Yours sincerely

20/9/17

Mark Ozinga  
**Principal Manager, Land Use Planning and Development  
Freight, Strategy and Planning**

Objective Reference CD17/10245

# Secretary's Environmental Assessment Requirements

## Section 75W of the Environmental Planning and Assessment Act 1979

<b>Application number</b>	MP 10_0068 MOD 1 (Concept Plan)
<b>Modification</b>	<b>Concept Plan</b> – relocate commercial podium and tower envelope further west (minimum 80 m setback to Church Street), reduce Argyle Street setback to zero, increase commercial gross floor area (GFA) from 35,000 m <sup>2</sup> to 112,000 m <sup>2</sup> , increase height of commercial tower envelope from 25 storeys (20 storeys above existing five storey retail podium) to 46 storeys (39 storeys and two storey commercial podium above existing five storey retail podium), increase maximum height from 120 m to 210 m above ground level, increase floor plate size and form of commercial tower envelope, relocate commercial tower lobby and entry from Church Street to Argyle Street, and retail access and design changes to the retail podium.
<b>Location</b>	Westfield Shopping Centre, Church Street and Argyle Street, Parramatta
<b>Applicant</b>	Scentre Group (formally Westfield Pty Ltd)
<b>Date modified</b>	TBC
<b>Expiry date</b>	If the modification application is not exhibited within 2 years after this date, the proponent must consult further with the Secretary in relation to the preparation of the environmental assessment.
<b>General Requirements</b>	<p>The modification application must include:</p> <ul style="list-style-type: none"> <li>• An executive summary.</li> <li>• A description of the existing and surrounding environment.</li> <li>• A thorough description and justification of the proposal, including: <ul style="list-style-type: none"> <li>◦ a detailed justification for proposed tower relocation, increases in GFA, height and floor plate size;</li> <li>◦ identification and analysis of alternatives, in particular for the additional commercial floor space, and environmental impacts; and</li> <li>◦ description of the public benefits arising from the proposal.</li> </ul> </li> <li>• Consideration of any statutory provisions (see below).</li> <li>• A detailed assessment of the key issues specified below, including: <ul style="list-style-type: none"> <li>◦ a description of the existing environment; and</li> <li>◦ an assessment of the potential impacts of the modifications, including cumulative impacts.</li> </ul> </li> <li>• An amendment to the approved Statement of Commitments (where relevant).</li> <li>• A conclusion justifying the proposal, taking into consideration the environmental impacts of the proposal, and the suitability of the site.</li> </ul>
<b>Key issues</b>	<p>The modification application must address the following specific matters:</p> <p><b>1. Environmental Planning Instruments, Policies and Guidelines</b></p> <ul style="list-style-type: none"> <li>• Address the relevant statutory provisions that would apply if those provisions applied to the carrying out of the project, including the following: <ul style="list-style-type: none"> <li>◦ State Environmental Planning Policy (State and Regional Development) 2011;</li> <li>◦ State Environmental Planning Policy (Infrastructure) 2007; and</li> <li>◦ Parramatta Local Environmental Plan 2011.</li> </ul> </li> <li>• Address the relevant provisions, goals and objectives in the following: <ul style="list-style-type: none"> <li>◦ <i>NSW State Priorities</i>;</li> <li>◦ <i>A Plan for Growing Sydney</i>;</li> </ul> </li> </ul>

- *Towards our Greater Sydney 2056;*
- *Draft West Central District Plan;*
- *NSW Long Term Transport Master Plan;*
- *Guide to Traffic Generating Developments (RMS);*
- *Sydney's Walking Future 2013;*
- *Sydney's Cycling Future 2013;*
- *Sydney's Bus Future 2013;*
- *Sydney's Rail Future 2013;*
- *NSW Planning Guidelines for Walking and Cycling; and*
- *Development Near Rail Corridors and Busy Roads – Interim Guideline.*

## **2. Built Form and Urban Design**

- Include a detailed justification for proposed tower relocation, increases in GFA, height and floor plate size with particular consideration to the height, bulk and scale and setbacks of the proposed development, its impacts on amenity, views and vistas, and how it would successfully relate to the built form of the existing and future character of the surrounding area.
- Provide a table identifying the proposed development's different land uses including a floor-by-floor breakdown of GFA, total GFA and site coverage.
- Identify any change to the use and/or layout of the site and development and associated impacts on circulation movements, access and linkages.
- Address the proposed relationship between the street level entrance lobby and adjoining retail.
- Address any approval/s required under the *Airports Act 1996* due to the proposed height of the commercial tower.

## **3. Amenity**

- Justify the proposal in terms of particular impacts on view loss, sunlight/overshadowing, wind impacts, reflectively, visual and acoustic privacy, and safety and security to achieve a high level of environmental amenity, particularly with regard to residential properties to the south.

## **4. Visual Impacts**

- A visual impact assessment must be undertaken to identify the visual changes and view impacts of the project to/from key vantage points and surrounding land. Photomontages or perspectives should be provided showing the project.
- The visual impact assessment must consider the impact of the project on key views to and from places of heritage significance including important views identified within the *Conservation Agreement for the protection and conservation of World and National Heritage values of the Australian Convict Sites, Old Government House and Domain, Parramatta.*

## **5. Traffic, Car Parking, Transport and Access (Construction and Operation)**

- Include a transport and accessibility impact assessment **that provides, but is not limited to, the following** and prepared in accordance with the relevant guidelines **identifying:**
  - **accurate details of the current daily and peak hour vehicle, public transport, pedestrian and bicycle movements and existing traffic, public transport, pedestrian and bicycle and facilities provided on the road network located adjacent to the proposed development;**
  - **estimated daily and peak hour trips likely to be traffic-generated by the proposed development, including vehicle, public transport, walking and cycling trips generation during construction and operation;**

- ~~existing and~~ proposed public transport, pedestrian and bicycle ~~routes and~~ facilities as part of the proposed development;
- the adequacy of ~~existing and future~~ public transport, pedestrian and bicycle provisions to meet the demand of the proposed development;
- an assessment of the existing and future performance of key intersections providing access to the site and the impact of traffic generated on nearby intersections and any road infrastructure works required, taking into account cumulative impacts of traffic volumes from the proposal together with existing and approved ~~from other~~ developments in the area. The assessment needs to be supported by appropriate modelling and analysis to the satisfaction of Roads and Maritime Services;
- an assessment of the impacts on the pedestrian and public transport facilities, the bus operation and pedestrian movements along Argyle Street, in consultation with TfNSW, as a result of the reduction of Argyle Street setback to zero and the relocation of commercial tower lobby and entry from Church Street to Argyle Street;
- measures to encourage sustainable travel and non-car mode share, (e.g. implementing a sustainable travel plan and end of trip facilities);
- details of service vehicle movements and site access arrangements (including vehicle type and likely arrival and departure times of service vehicles);
- assessment of proposed loading dock and servicing provisions and access arrangements to loading docks;
- proposed bicycle and car parking provision with justification of the level of car parking provided on the site and demonstrating compliance with relevant RMS guidelines and Australian Standards; and
- proposed access arrangements including service and emergency vehicles.
- Include ~~a Construction Traffic Management Plan and~~ a Transport Management and Accessibility Plan based on the findings of the transport and accessibility impact assessment.
- Include a Pedestrian and Construction Traffic Management Plan that provides the following to demonstrate the proposed management of impact:
  - details of construction vehicle routes, hours of operation, access arrangements and traffic control measures for all demolition/construction activities;
  - details of anticipated truck movements to and from the site;
  - details of access arrangements for workers to/from the site, emergency vehicles and service vehicle movements;
  - details of temporary cycling and pedestrian access during construction;
  - details of proposed construction vehicle access arrangements at all stages of construction; and
  - an assessment of traffic and transport impacts including cumulative impacts associated with other construction activities in the area and how these impacts will be mitigated for any associated traffic, pedestrian, cyclist and public transport.

Relevant Policies and Guidelines

- *Guide to Traffic Generating Developments (Roads and Maritime Services)*
- *NSW Planning Guidelines for Walking and Cycling*
- *Guide to Traffic Management – Part 12: Traffic Impacts of Development (AUSTROADS)*

**6. Heritage**

- Include a Heritage Impact Statement (HIS) prepared by a qualified Heritage Consultant which assesses the impact of the project on places of heritage significance, and compliance with the *Conservation Agreement for the protection and conservation of World and National Heritage values of the Australian Convict Sites, Old Government House and Domain, Parramatta*.

**7. Public Domain and Public Access**

- Outline the scope of public domain improvements, street activation, key pedestrian linkages with and between other public domain spaces, existing and proposed buildings and surrounding areas including Parramatta Rail Station and Parramatta Transport Interchange.
- Include a Public Domain Upgrade Plan for the project covering the street edges of Church, Argyle, Marsden, Aird and Campbell Streets.

**8. Economic Justification**

- Provide economic and market analysis to justify the proposed variation to the approved concept tower form.

**9. Ecologically Sustainable Development (ESD)**

- Identify how best practice ESD principles will be incorporated in the design of the development, and include innovative and best practice proposals for environmental building performance.

**10. Developer Contributions**

- Provide the scope of developer contributions proposed.

**11. Utilities**

- Address the existing capacity and any augmentation requirements of the development for the provision of utilities, including staging of infrastructure and additional licence/approval requirements in consultation with relevant agencies.
- Identify any potential impacts on existing utility infrastructure and service provider assets, and demonstrate how these will be protected or impacts mitigated.

**12. Pre-submission Consultation Statement**

- The EA must include a report describing pre-submission consultation undertaken, including consultation with the local community, issues raised during that consultation and how the proposal responds to those issues.

**13. Statement of Commitments**

- The EA must include a Statement of Commitments detailing measures for environmental management, impact mitigation and on-going monitoring.



<b>Consultation</b>	<p>During the preparation of the modification application, you must consult with local, State or Commonwealth Government authorities, service providers, community groups and affected landowners, as relevant. In particular, you should consult with:</p> <ul style="list-style-type: none"> <li>• The City of Parramatta Council.</li> <li>• Roads and Maritime Services.</li> <li>• Transport for NSW (including the Sydney Coordination Office).</li> <li>• The Office of Environment and Heritage.</li> <li>• Sydney Water.</li> <li>• Sydney Trains.</li> <li>• Civil Aviation Safety Authority.</li> <li>• Air Services Australia.</li> </ul> <p>The EA must describe the pre-submission consultation process, issues raised and how the proposed development has been amended in response to these issues. A short explanation should be provided where amendments have not been made to address an issue.</p>
<b>Further consultation after 2 years</b>	<p>If you do not lodge a development application and EA for the development within 2 years of the issue date of these SEARs, you must consult further with the Secretary in relation to the preparation of the EA.</p>
<b>References</b>	<p>The assessment of the key issues listed above must take into account relevant guidelines, policies, and plans. While not exhaustive, the following attachment contains a list of some of the guidelines, policies, and plans that may be relevant to the environmental assessment of this proposal.</p>

# Plans & Documents

## Plans and Documents

The following plans and relevant documentation shall be submitted;

1. An **existing site survey plan** drawn at an appropriate scale illustrating:
  - The location of the land, boundary measurements, area (sqm) and north point.
  - The existing levels of the land in relation to buildings and roads.
  - Location and height of existing structures on the site.
  - Location and height of adjacent buildings and private open space.
  - All levels to be to Australian Height Datum (AHD).
2. A **locality/context plan** drawn at an appropriate scale should be submitted indicating:
  - Significant local features such as parks, community facilities and open space and heritage items.
  - The location and uses of existing buildings, shopping and employment areas.
  - Traffic and road patterns, pedestrian routes and public transport nodes.
3. **Drawings** at an appropriate scale illustrating:
  - The location of any existing building envelopes or structures on the land in relation to the boundaries of the land and any development on adjoining land.
  - A comparison between the approved building envelope and proposed building envelope.
  - Detailed plans, sections and elevations.
  - The height (AHD) of the proposed development in relation to the land.
  - Any changes that will be made to the level of the land by excavation, filling or otherwise.
4. **Shadow diagrams** showing solar access to the site and surrounding areas at summer solstice (Dec 21), winter solstice (June 21) and the equinox (March 21 and September 21) at 9.00 am, 12.00 midday and 3.00 pm. Existing and proposed shadow diagrams shall be provided for all affected residential buildings, in particular No. 140 Church Street.
5. **3D modelling** of the proposal and the surrounding development in digital format in accordance with the relevant guidelines.
6. **Visual Impact Assessment:**  
The visual impact assessment, including focal lengths, must be done in accordance with Land and Environment Court requirements, to/from key vantage points and surrounding land.

### Visual assessment methodology

- The consultant's methodology should be explicit. This may include a flow-chart indicating how the analysis is to be undertaken, or a narrative description of the proposed sequence of activities.
- As part of the methodology, the consultant should provide, and explain, criteria for assessment relevant to the site, local context and proposed built form and public domain outcomes. A rationale should be provided for the choice of criteria. Criteria must include reference to the planning framework.
- Visual catchment should be defined and explained (see below).
- An assessment matrix should be produced including number of viewers, period of view, distance of view, location of viewer to determine potential visual impact - i.e. high, medium or low.

### Visual catchment

- Potential visual catchments and view locations, including contours (areas from which the development is visible) should be identified. This must include, but is not limited to Church Street (from north to south), Fitzwilliam Street, Argyle Street, Centenary Square, Old Government House and Lancer Barracks.

	<ul style="list-style-type: none"> <li>• Categories of views (e.g. from the water, from public open space, from key streets, from main buildings and from key heritage items) should be defined.</li> <li>• Photos are required for representative view categories, plotted on a map.</li> </ul> <p><b>Visual material</b></p> <ul style="list-style-type: none"> <li>• Reference to be made to site analysis.</li> <li>• Provide key plan indicating where viewpoints are located and narrative explaining why these have been selected.</li> <li>• The modified and approved built form should be illustrated in the context of the visual catchment to enable assessment of the visual impact.</li> <li>• The location of cross-sections should be clearly shown on a key plan and the choice of positions explained. The cross sections should be shown in the context of the visual catchment.</li> <li>• Vertical exaggeration should provide an accurate rather than 'flattened' impression of buildings in the context of the visual catchment.</li> <li>• A key plan must be provided for photomontages. In addition, the choice of locations should be explained. Photomontages should be provided for close as well as distant views.</li> <li>• Assessment must benchmark against the existing situation and currently approved plans.</li> <li>• Photomontages to be provided for key viewpoints from all directions, and from several positions within the visual catchment including Church Street (from north to south), Fitzwilliam Street, Argyle Street, Centenary Square, Old Government House and Lancer Barracks.</li> <li>• As above, support visual evidence such as cross sections to be drawn to realistic scales and shown in context.</li> <li>• A comparison of 'before', 'approved' and 'proposed' is fundamental to a visual impact assessment, therefore the visual impact assessment (A3 in size) should be undertaken using human eye focal lengths (50mm at 35mm FX format and 46° angle of view) from long range, medium range and short range positions so that they can be assessed with respect to visibility, visual absorption capacity and visual impact rating, as well as a comparison analysis with the approved project.</li> </ul> <p>7. <b>Wind Impact Assessment</b> including tunnel modelling.</p> <p>8. <b>Traffic and Transport Impact Assessment.</b></p> <p>9. <b>Public domain interface plan.</b></p> <p>10. <b>Heritage Impact Statement.</b></p> <p>11. <b>Transport Management and Accessibility Plan.</b></p> <p>12. <b>Conceptual Water Management Plan.</b></p> <p>13. <b>Conceptual Infrastructure Servicing Plan.</b></p>
<b>Documents to be submitted</b>	<ul style="list-style-type: none"> <li>• 1 hard copy and 1 electronic copy of all documents and plans for review prior to exhibition.</li> <li>• 4 hard copies of the documents (once the application is considered acceptable).</li> <li>• 4 hard copies of the plans at A3.</li> <li>• 2 copies of photomontage boards at A0 in size illustrating east/west/south and north perspectives of the proposal.</li> <li>• 12 copies of all the documentation and plans on USB (PDF format).</li> </ul>