



Your Reference: MP10_0068 MOD 1
Our Reference: NCA/12/2016
Contact: Myfanwy McNally
Telephone: 9806 5447

1 December 2017

Nuray Duran
Department of Planning and Environment
22-23 Bridge Street Sydney
NSW 2000

Dear Ms. Duran,

Re: Modification 1 of SEARs – MP10_0068 - Concept Plan for Westfield Shopping Centre Parramatta Retail and Commercial Development

Thank you for the opportunity to comment on the modification Secretary's Environmental Assessment Requirements (SEARs) for this proposal. The response combines comments from the Urban Design Team – Built Form and Public Domain, the City Architect Team and Land Use Planning team. Council is supportive of the delivery of commercial floor space in the city centre for future jobs Growth and would aim to ensure proposal is in line with our aspirations for the Parramatta city Centre as outlined in our LEP and DCP.

In advice offered last year, a number of recommendations were made for inclusion in the SEARS criteria for the assessment of the development. Our detailed comments below outline whether our previous recommendations have been considered. An assessment of the proposal against the updated concept plan has identified a significant departure from the previous design and as such additional concerns in relation to this iteration have been outlined, with recommendations on how these can be addressed.

Council would like to make the following recommendations in response to the conceptual design criteria.

The need for a comprehensive masterplan

- A masterplan of the Westfield site needs to be undertaken. This masterplan should also include the relationship to Parramatta Square and Church Street. The masterplan will enable the generation of principles and objectives to then justify the location of any proposed tower.

Tower location

- The tower must not terminate the view corridor of Church street.
- The tower must reinforce the corner of Church street and Argyle street, and respond to the street and block pattern of the site and its context by aligning with Church Street.
- The tower must be located in a position and orientation that is conducive to future redevelopment of the entire Westfield site. A masterplan must be undertaken in order to determine its location in a considered and holistic manner.
- The location of the core is likely to result in a large expanse of blank wall on the western elevation. It is recommended that through the reconfiguration of the tower envelope, the core can be relocated in order to reduce this impact.

Building Form

- The tower must sit on the established podium that is the Westfield building. Council is not supportive of an additional podium component as shown in the Concept proposal.
- The building's orientation should be aligned with the Church street frontage to reduce the tower's apparent density, and assist in creating a positive relationship with the prominent SW corner of Parramatta Square.

Bulk and Scale

The City of Parramatta Council's Draft CBD DCP seeks the following outcomes for commercial development in Parramatta CBD. These provisions are aligned with Council's endorsed position of seeking to achieve "an attractive and distinctive city skyline, defined by tall slender towers" *CBD Planning Strategy, April 2015*.

- The tower floorplate of any commercial building must be no greater than 2500sqm GBA. Floor plates over 2500sqm should be justified and must be tested through a design excellence process.
- The tower depth should ensure that all building occupants are within 12m of a source of daylight, in the attainment of 'Grade A' commercial office floor space.

Tower Setbacks

- The tower must have minimum 6m setbacks to all frontages to the street to ensure views to sky, wind downdraft mitigation and clear definition of the street wall. The development should also observe the controls as outlined in Council's CBD PP and City Centre DCP.

Tower Separation

- The tower should be located so as to ensure a minimum 24m building separation from existing and proposed developments. This can be achieved by utilising the width of the road reserves of Argyle street and Church Street and tower setbacks above the street frontage height. A thorough analysis of the proposals that are active in the immediate vicinity of this proposal should be undertaken to ensure adequate building separation is achieved.
- Council is supportive of the delivery of commercial floor space in the city centre for future jobs Growth. Council would like to see this floor space to be realised in line with our aspirations for Parramatta city Centre as outlined in our LEP and DCP.

Ground floor interface

- The applicant must lodge plans and elevations of both the existing and proposed ground floor interface, particularly internal floorplans of the existing building.
- The Lobby width should be minimised to ensure activation of the ground floor frontage of the northern aspect. Council recommends that the tower location should encourage the co-location of commercial and retail entries, taking advantage of the prominent pedestrian access points.
- Council is supportive of the fine grain tenancies that front Argyle Street. This design element should be reflected along the Church street frontage. This involves reconfiguration of the services and utilities that create a 'blank' or inactive edge to the street in this location.

Public Domain Plan

- Review and upgrade the intersection of Argyle and Church St to refine the potentially reduce/refine kerb radii on the western side of Church St, in order to control the traffic speed of turning vehicles and improve the waiting areas at the street corners.
- A reconfiguration of the vehicle access (Church St) under the railway corridor north of Argyle St to achieve:
 - Stronger pedestrian connection along Church St corridor through the railway underpass;
 - Reinforced Church St road reserve alignment;
 - 3.5m wide carriage way for one-way traffic only (south bound);
 - Prioritised pedestrian crossing connecting future Parramatta Square.
- Upgrade the interfaces of railway underpass to improve the visual continuity and permeability to enhance the connection between the southern part of Church St and future Parramatta Square. Suitable public artwork, lighting, wayfinding system shall be intergraded into the public domain treatment.
- Provide more public accessible spaces along Argyle St frontage by:
 - Recessing the office lobby entry to allow generous public seating/resting spaces in the colonnade;
 - Locating bench seats at the bus stop within the property boundary (i.e. between columns) to allow clear path of travel along the property boundary.
 - Indicate designated outdoor dining zones along the new F&B outlets in the plan to minimise the impacts of the footprint to the public domain.
- Review the existing interface on Church St to maximise coverage of active edges and direct accesses to the retail outlet from the street.
- Reduce carriageway on Church St south of Argyle St to approx. 7m (2 x traffic lane with mix traffic cycleway), and widened footpath to accommodate large pedestrian flow and street activities, e.g. night market.

- Reduce carriageway on Campbell St to 3.0-3.2m for each traffic lane and widen the footpath along the entire Westfield site to minimum 4.65m (between boundary and kerb face) as required in PDG.
- Upgrade intersection of Aird and Church St to minimise the crossing distance.
- Renew the footpath pavement with granite on both sides of Church St; and concrete unit paving on other streets as required in the PDG.
- Provide new street trees on all footpaths interfacing the entire Westfield site.

Environmental Planning Instruments, Policies and Guidelines

In addition to the statutory provisions listed in the SEARS, the application should also address the draft Parramatta CBD Planning Proposal endorsed by Council on 11 April 2016. While this draft planning proposal has not received a Gateway Determination, it has been endorsed by the Council and sets the direction against which site specific planning proposals are considered. The specific matters within the draft Planning Proposal that the EIS must address or expand upon are:

1. Solar access to Jubilee Park between 12-2pm on 21 June (clause 7.4) supported by Shadow Diagrams that show the shadows cast by the proposed tower
2. Intrusion into prescribed airspace within the meaning of the Airports Act 1996 (clause 7.6) addressed through a clear statement
3. Provision of active street frontages (clause 7.14) supported by Architectural Plans that include the level of detail required by the Urban Design Team
4. Provision of end of journey facilities (clause 7.13) supported by Architectural Plans
5. Energy and water targets (clause 7.17) supported by ESD Statement/Strategy
6. Provision of dual water systems (clause 7.18) supported by ESD Statement/Strategy
7. Flood risk management (clause 7.19) supported by Flooding, Stormwater and WSUD Report and Plans

The draft planning controls are available via:

http://www.parracity.nsw.gov.au/data/assets/pdf_file/0008/179882/Appendix_17_Potential_Draft_LEP_Provisions.pdf

The proposal by Westfields for a commercial tower is consistent with the draft planning proposal in regard to land use.

The draft Parramatta CBD Planning Proposal supports employment objectives and commercial development. The proposal by Westfields does not specifically identify a proposed FSR, rather details for the tower including number of storeys, commercial GFA, maximum RL building height and floor plate areas are provided. The proposal by Westfields for a 47 storey commercial tower raises a number of design and amenity issues as the tower exceeds the standard instrument controls and therefore would need to meet the Design Excellence requirements.

Summary of Recommendations:

- A Design review panel, or design excellence competition process must be undertaken in accordance with the Department of Planning and Environment's ministerial direction regarding Design Excellence and in concert with the Government Architect's Office.
- Masterplan for the entire Westfield site to be generated.
- Assessment against the Parramatta DCP 2011, LEP 2011 and Draft Parramatta CBD Planning Proposal.
- Assessment of overshadowing impacts to jubilee park
- Economic feasibility study of the amount of GFA being proposed.
- To provide council with a copy of the digital model of the proposed building envelope
- Existing internal floorplans (to show what has changed)
- Detailed requirements for the public domain interface plan (as per our previous iteration of comments).

Next Steps

Thank you for your consideration of Council's recommendations. We look forward to working with the Department of Planning and Environment to resolve the abovementioned issues associated with the proposal.

The City of Parramatta Council strongly encourages the project team to organise a meeting with Council Staff to discuss the proposal in more detail. This meeting can be arranged by contacting the City of Parramatta Council's City Significant Team on 02 98065447.

Yours sincerely,

A handwritten signature in black ink that reads "Myfanwy McNally". The script is cursive and fluid, with the first name "Myfanwy" and the surname "McNally" clearly legible.

Myfanwy McNally
Manager City Significant Development