



**SECTION 75W MODIFICATION REQUEST
MAJOR PROJECT MP10_0068 MODIFICATION 1
WESTFIELD PARRAMATTA SHOPPING CENTRE
ENVIRONMENTAL ASSESSMENT PURSUANT TO THE FORMER
PART 3A OF THE EPA ACT 1979**

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



**Prepared for
Scentre Group
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APPENDICES

Appendix A	Site Survey Plan prepared by URBANEX
Appendix B	Urban Design Report prepared by Woods Bagot, including: Vision, Site and Context, Analysis and Review, Design Response – Site, Design Response – Streetscape, Design Response – Tower, Shadow Diagrams, 3D Model and Tower Envelope Modification Plans.
Appendix C	Indicative Concept Plans prepared by Scentre Group including, Floor Plans, Elevations and Sections.
Appendix D	Landscaping & Public Domain Concept prepared by Site Image
Appendix E	Economic Assessment Report prepared by JLL
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EXECUTIVE SUMMARY

This Environmental Assessment Report accompanies a Modification Application pursuant to Section 75W of the former Part 3A of the Environmental Assessment Act 1979, in relation to Major Project MP_0068, Westfield Shopping Centre, Parramatta. A Concept Approval for this Major Project was issued by the Planning Assessment Commission of NSW on 20th February 2014 for additions to the shopping centre, incorporating the following works:

- 31,495m² (GFA) of retail additions and associated internal modifications;
- Building envelope for commercial tower above retail podium incorporating up to 35,000m² (GFA) commercial floor space;
- Parking for 562 vehicles;
- Associated public domain works; and
- Road infrastructure works to support the development.

The Modification Application (Modification 1) seeks approval for the following changes to the office tower envelope, as currently approved:

- Increase total assessable commercial gross floor area (GFA) from 35,000m² to 112,000m²;
- Increase the number of office levels from 25 to 41 plus a mid-tower transfer/service level and roof plant level.
- Change the tower form to a generally rectangular shape, as illustrated in the enclosed plans, with a 38.7m wide elevation to Argyle Street
- Increase the maximum permitted building height of 120m above ground level to a maximum of 188m above ground level (maximum RL 220).
- Provide an unenclosed transition level up to 2 storeys height above the existing 5 storey retail podium, to be integrated with the approved additional retail level.
- Increase maximum office tower building envelope floor area from 1,800m² to 3,025m² 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 79m to Church Street, with a 3m 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 Argyle Street.

The planned future commercial office tower within the proposed building envelope, as modified, will be designed as a prestige A Grade landmark 5 GreenStar office tower capable of attracting major private and government tenants to Parramatta. The proponent, Scentre Group, has since approval of the original Concept Plan office tower building envelope, explored opportunities in the marketplace to attract suitable international and national corporations to Parramatta, to occupy the future office tower, as approved in the Concept Plan. Feedback from this process indicates that such major prospective tenants require larger floor plates and total floor space in excess of 35,000m², than is allowed for in the current Concept Plan Approval.

The existing Concept Plan Approval provides for a 25 storey office tower envelope with floor plates of up to 1,400m² above the existing 5 storey retail podium, located on the southwest corner of Church Street and Argyle Street. It is not possible to accommodate the proposed taller and larger office tower envelope in this location, due to building, floor layout and operational and structural constraints imposed by the existing retail podium at this corner of the site.

It is not viable to demolish the existing 5 storey retail podium to accommodate a taller and larger office tower envelope. Structural investigations have indicated that it is feasible to undertake building alterations and structural enhancements to the retail podium, further to the west, in the current location of the Department store, to provide for a taller office tower with larger rectangular floor plates. These works include reconfiguration of the various floor levels of the Department store, provision of a ground floor level office tower lobby to Argyle Street, an activated street frontage comprising retail/café uses, and on the roof of the existing retail podium, a 2-storey high podium space providing connectivity to the approved additional retail level.

The proponent has prepared Indicative Concept Plans showing how a future office tower could be developed within the proposed tower envelope, as modified. These concept plans also include indicative plans of potential changes to the existing retail podium to provide for an activated ground floor level and lobby and roof top retail/café precinct. Potential future development outlined in the Indicative Concept Plans does not form part of the modification of the tower envelope. Any future application for a project Approval (Development Application) for the planned future office tower would include changes to the floor plans and elevations of the existing retail podium below the tower.

Figure 1, below shows a plan view of the site showing the location of the currently approved tower envelope (in green dotted lines) and the location of the proposed tower envelope (in light blue dotted lines), as modified, further to the west, above the existing Department store. The area on the plan shown coloured grey is the location of proposed Level 6 retail that has been approved pursuant to the Project Approval. No changes to the Project Approval plans are proposed.

Figure 1 – Location Plan – Approved and Proposed Office Tower Envelope Locations

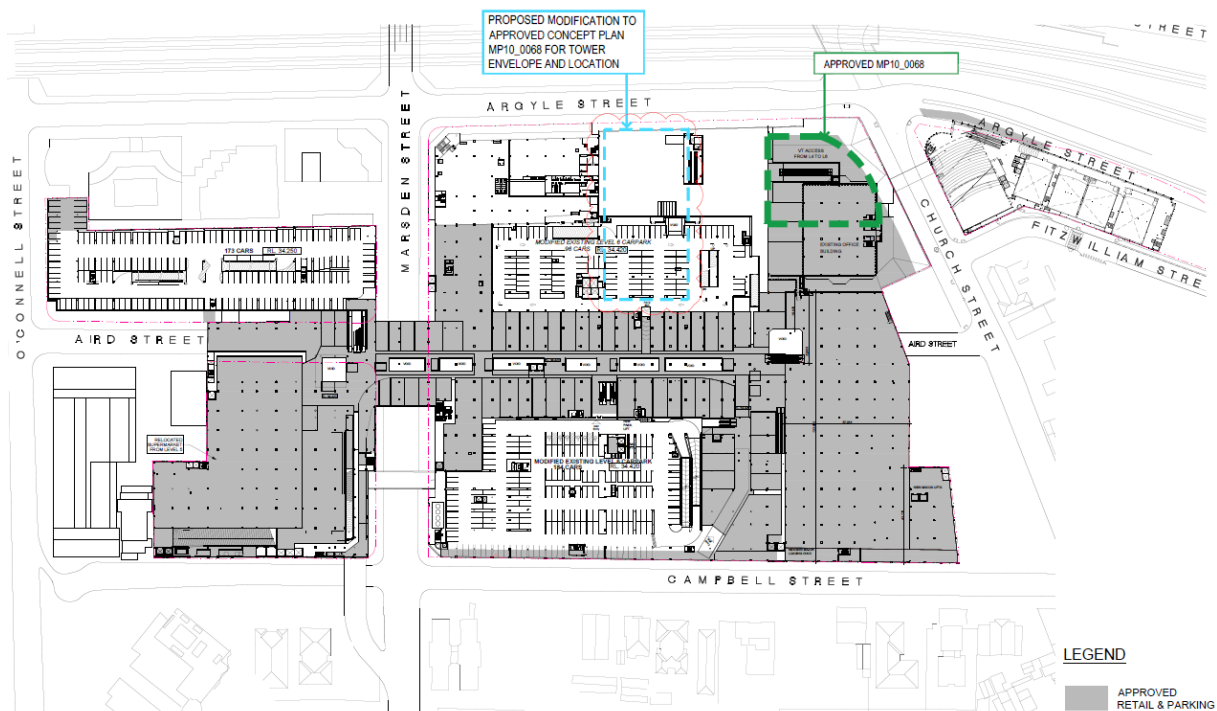


Figure 2A, below shows an elevation view from Argyle Street, looking south, of the modified office tower envelope in the location proposed further to the west of the current approved office tower envelope, which is shown with green dotted lines. **Figure 2B**, further below, shows an elevation view from Church Street.

Figure 2A – Argyle Street Elevation View of the Modified Office Tower Envelope

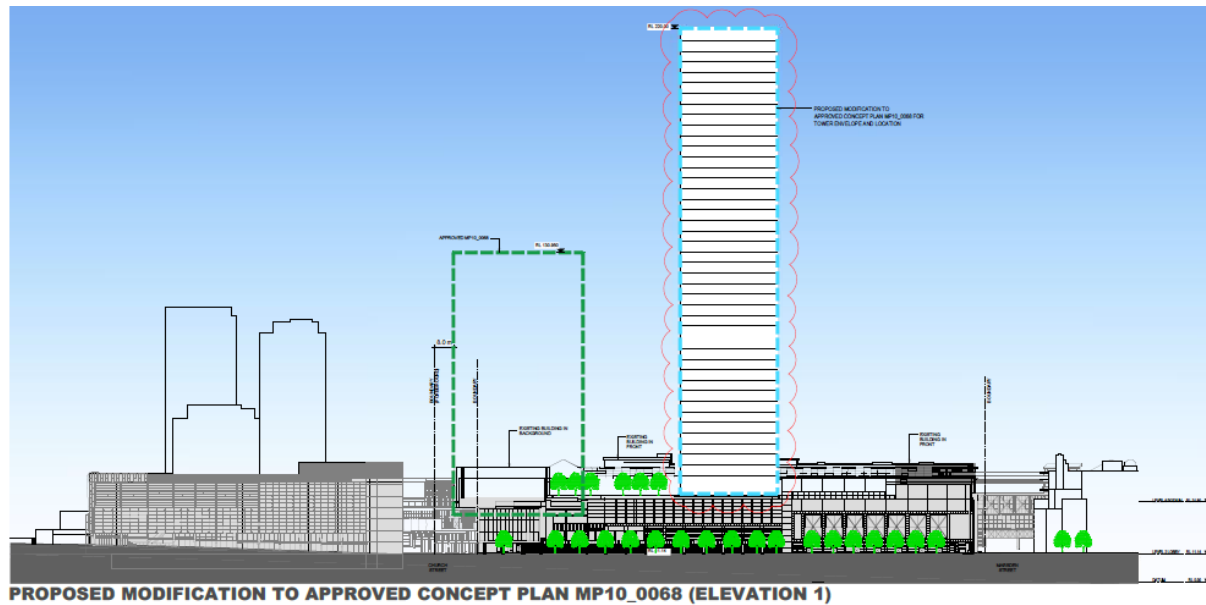
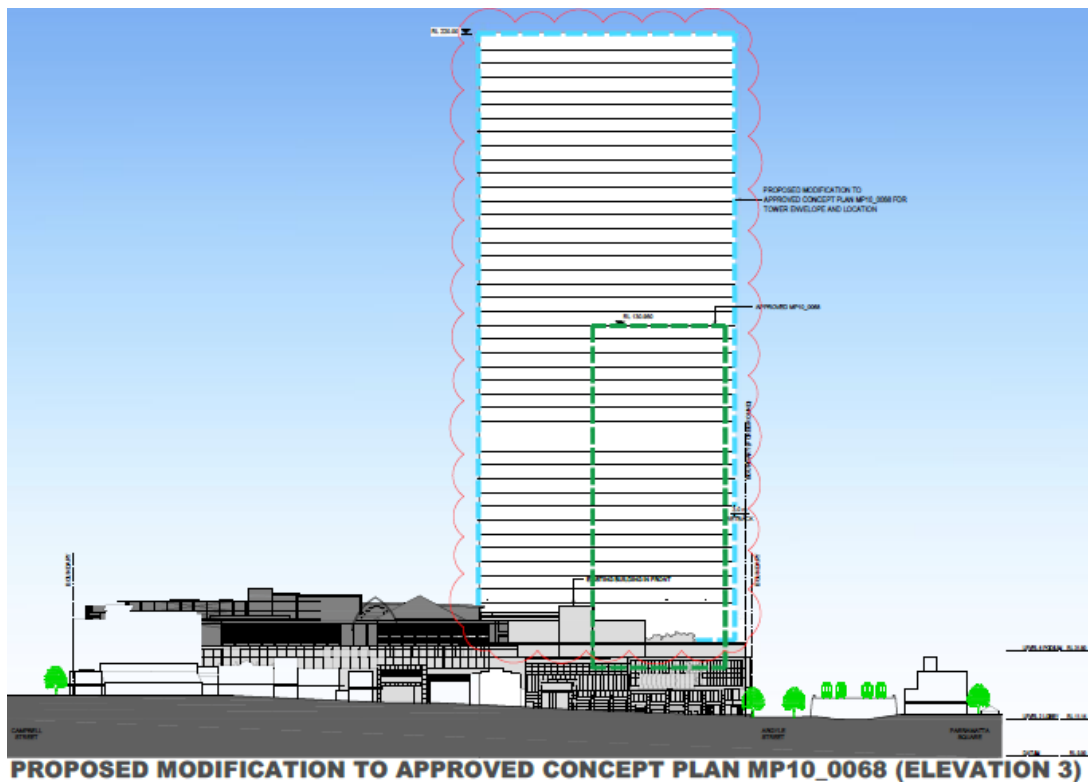


Figure 2B – Church Street Elevation View of the Modified Office Tower Envelope



No changes are proposed to the Concept Plan Approval for the additional retail level and car parking spaces. The existing Concept Approval provides for 100 car spaces for the office tower component. The Modification Application retains 100 car spaces for the larger office tower envelope, to ensure minimal change to traffic generation and optimal use of public transport.

The office tower development includes street activation to Church and Argyle Streets, enhanced public domain to Church and Argyle Streets, public art, provision of a raised paved threshold to the intersection of Argyle and Church Streets, improved pedestrian connectivity to Parramatta Square and payment of developer contributions towards initiatives proposed by Council for upgrading of the public domain around and near the Westfield Parramatta Shopping Centre.

The proposed office tower, as modified, will assist in addressing the current undersupply of A Grade office floor space in Parramatta, contribute to employment growth within the Parramatta CBD, increase patronage of public transport, enhance the southern gateway to the Parramatta CBD and strengthen the role of Parramatta's CBD as Sydney's second CBD.

The transitional provisions of the *Environmental Planning and Assessment Act and Regulations* apply to the proposed modification and retain the provisions of Section 75W of the former Part 3A of the *Environmental Planning and Assessment Act*, under which the original Concept Approval was issued in February 2014 by the Planning Assessment Commission of NSW, as delegate of the then Minister for Planning and Infrastructure.

Section 75W relates to Modification of Minister's approval and allows a proponent to request the Minister to modify the Minister's approval for a project where the project as modified is not consistent with the existing approval that has been issued.

The Environmental Assessment suitably addresses the assessment criteria prescribed in the NSW Planning and Environment Secretary's Environmental Assessment Requirements (SEAR's) issued on 29th September 2017 for the requested modification. The Environmental Assessment demonstrates that the proposed office tower envelope, as modified, provides a viable tower envelope for an A Grade office tower, in a manner that will have no unreasonable or significant adverse impacts on the environment, or the amenity of the locality, compared to the office tower envelope, as originally approved.

The Environmental Assessment has been prepared having regard to feedback received from community consultation and consultation with nominated government agencies and Parramatta Council, undertaken as part of the preparation of the Environmental Assessment. The Environmental Assessment includes a comprehensive site and urban design analysis justifying the proposed tower envelope height, setbacks and floor plate size and how it successfully relates to the built form of the existing and future character of the surrounding locality.

This Environmental Assessment prepared by Ingham Planning Pty Ltd, includes input from relevant specialist consultants, on behalf of the proponent, Scentre Group (formerly Westfield). The accuracy of the information contained in this report is to the best of our knowledge not false or misleading. The information and comments in this report have been based on information and facts that were correct at the time of preparation of this report in July 2018.

Nick Juradowitch
Director
Ingham Planning Pty Ltd

1. INTRODUCTION

1.1 – The proposed modification and revised tower envelope

This Environmental Assessment Report is provided in support of a Modification Application (MOD 1) relating a Concept Plan Approval for Major Project MP10_0068 Westfield Shopping Centre, Parramatta, comprising additions to the shopping centre incorporating retail additions of 31,495m² GFA, a building envelope for a commercial tower up to 35,000m² GFA, with maximum tower floor plate sizes of 1,400m² and parking for 562 vehicles, associated public domain works and road infrastructure works to support the development. This Concept Plan Approval was issued by the NSW Planning Assessment Commission on 20th February 2014.

MOD 1 is submitted pursuant Section 75W of the saved provisions of Part 3A of the Environmental Planning and Assessment Act 1979 (EPA Act) and seeks approval to modify the approved office tower envelope to provide for the following changes.

- Increase total assessable commercial gross floor area (GFA) from 35,000m² to 112,000m²;
- Increase the number of office levels from 25 to 41 plus a mid-tower transfer/service level and roof plant level.
- Change the tower form to a generally rectangular shape, as illustrated in the enclosed plans, 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 an unenclosed transition level up to 2 storeys height above the existing 5 storey retail podium, to be integrated with the approved additional retail level.
- Increase maximum office tower building envelope floor area from 1,800m² to 3,025m² for the 41 office tower floor levels (plus rooftop plant level and lift overrun).
- Relocate the building envelope further to the west to provide an office tower setback of 79m to Church Street, with a 3m 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 Argyle Street.

The proponent, Scentre Group (formerly Westfield), has since approval of the Concept Plan in 2014, has explored opportunities in the marketplace to attract suitable international and national corporations to Parramatta, to occupy the planned 35,000m² office tower. Feedback from this process indicates that major prospective tenants require larger floor plates and total floor space well in excess of 35,000m², allowed for in the current Concept Plan Approval. It has not been possible to elicit any major tenant interest in the market place for occupying an office tower of the scale and limited floorplate size that has been approved in the Concept Plan.

Further market analysis indicates that major tenants seeking A Grade office space in Parramatta require floor plate sizes of between 2,500m² and 3,500m². By way of example, the development application submitted in January 2018 by the Walker Corporation for a 56 storey office tower on sites 6 and 8, Parramatta Square, proposes commercial GFA of more than 130,000 accommodated half this floor space accommodated within “campus” floor plates of 3,000m² and the balance of office space within a “tower” floor plate of 2,400m².

The Concept Plan Approval provides for a 25 storey office tower envelope with floor plates of up to 1,400m² above the existing 5 storey retail podium on the southwest corner of Church Street and Argyle Street.

It is not possible to accommodate the proposed taller and larger office tower envelope in the existing approved location, due to building, floor layout and structural and operational constraints imposed by the existing retail podium at this corner.

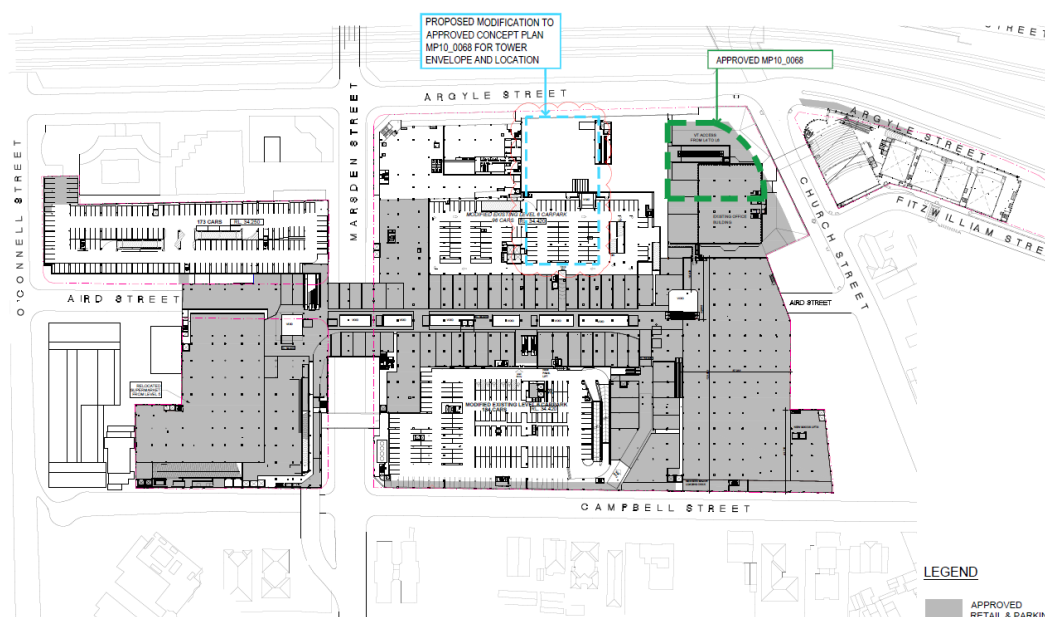
The approved office tower envelope has a smaller scale and floorplate size capable of being integrated into and structurally accommodated with the existing podium structure on the southwest corner of Church and Argyle Streets. This was proposed to be achieved by strengthening the existing building and installing new columns through the existing podium levels, without the need for any significant demolition of the existing retail podium.

The larger floorplate and increased floorspace now proposed for the office tower envelope, if located, as currently approved, would necessitate demolition of the whole of the retail podium and the levels below ground level, between Aird Street and the existing Department Store. Such demolition would significantly disrupt the operation of the existing shopping centre, displace a larger number of tenants and have material adverse short and longer-term impacts on the viability of the shopping centre. The proposed office tower envelope, as modified, is not feasible if it is located at the southwest corner of Church and Argyle Streets.

The proponent has investigated alternative locations for a larger tower envelope that can be accommodated without requiring wholesale demolition of substantial areas of existing retail floor space and in a location that maintains an appropriate urban design outcome, proximity to Parramatta Square and the railway station, have lobby access off either Church Street or Argyle Street and not increase overshadowing of apartments located on the eastern side of Church Street, or lunch time solar access in nearby Jubilee Park. The now proposed location, above the existing Department Store, fulfils these requirements.

The area above the Department Store is of sufficient size to accommodate a rectangular tower floor plate of the size proposed. The Department Store can also be readily internally reconfigured to provide space for construction of supporting columns through the existing retail podium, capable of structurally accommodating the larger office tower building above. The proposed location of the office tower, in relation to the existing approved office tower location (green dotted line) is shown by light blue dotted lines in **Figure 3**, below.

Figure 3 – Location Plan – Approved and Proposed Office Tower Envelope Locations



Relocating the office tower 79m from Church Street ensures there is no encroachment into the southern vista down Church Street from Parramatta Square and provides more adequate building separation to the planned high-rise towers in Parramatta Square. A substantial view corridor south from Church Street is retained. Moving the tower further west also frees up the Argyle and Church Street corner for improved retail and public activation. The introduction of a ground floor tower lobby, cafes and shops at ground floor level to Argyle Street activates this street frontages and facilitates creation of an active public domain in this somewhat underutilised section of Argyle Street, which currently offers little for pedestrian amenity or street life.

Figure 4, below shows a northern elevation view from Argyle Street, looking south, of the modified office tower envelope in the location proposed, further to the west of the current approved office tower envelope, shown with black dotted lines, to the left.

Figure 4 – Argyle Street Elevation View of the Modified Office Tower Envelope

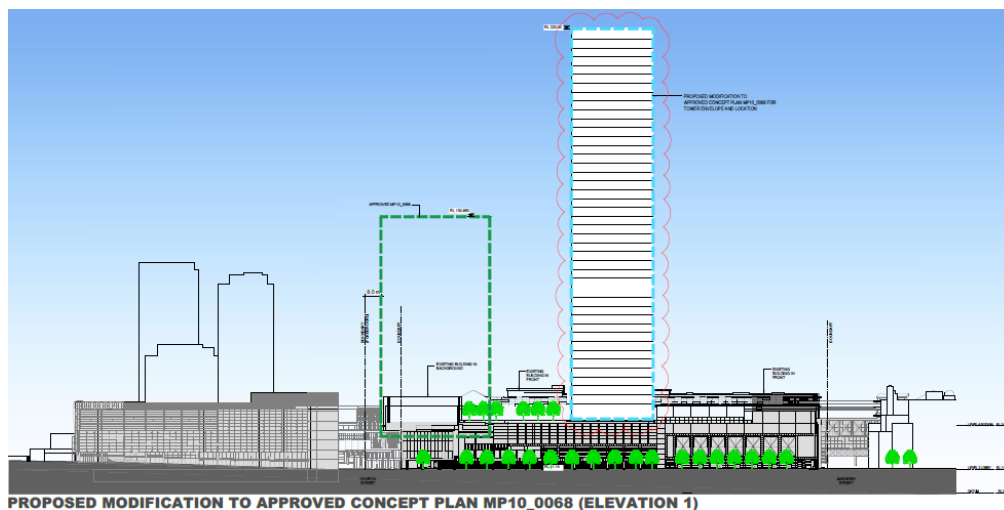


Figure 5, below shows an eastern elevation view from Church Street, looking west, of the modified office tower envelope in the location proposed further to the west of the current approved office tower envelope, shown with green dotted lines, forward of the new envelope.

Figure 5 – Church Street Elevation View of the Modified Office Tower Envelope

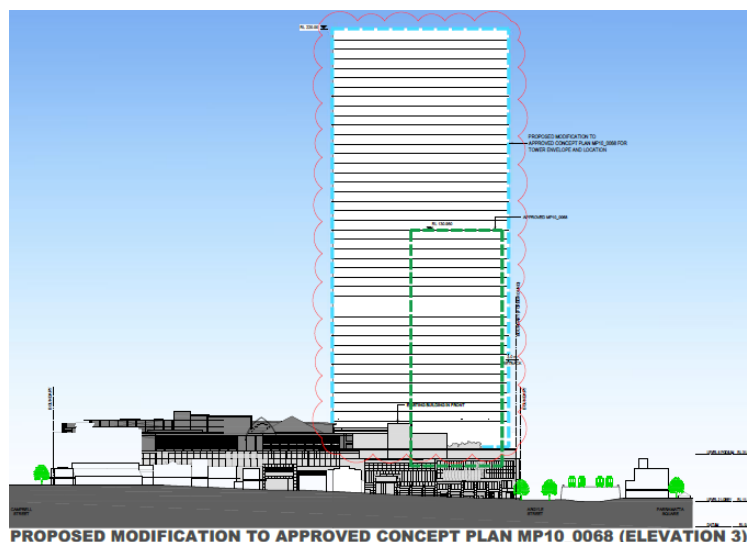
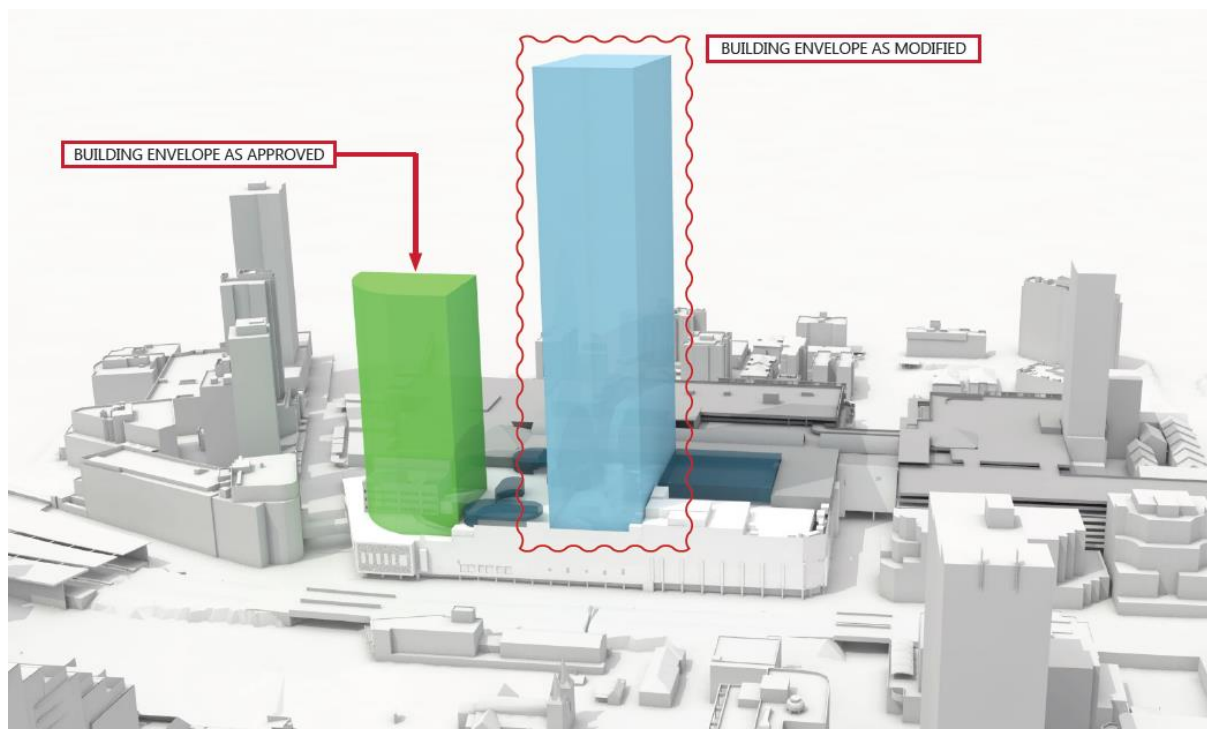


Figure 6A, below shows a 3D comparison view, from the north, of the office tower envelope as currently approved (coloured green at left in the view) and the proposed office tower envelope (coloured light blue at right in the view), as sought to be modified.

Figure 6A – 3D Comparison View of Approved and Proposed Tower Envelopes



The proposed commercial office tower will be designed as a prestige A Grade landmark 5 GreenStar office tower capable of attracting major private and government tenants to Parramatta. A slim tower elevation to Argyle Street minimises overshadowing of neighbouring properties, optimises access to natural light for occupants and provides for an efficient floor layout for tenants.

The future office tower constructed within the proposed building envelope will require, as part of any future development application, changes to the existing retail podium to accommodate supporting columns, a lift and stair core and ground floor lobby. Indicative concept plans have been prepared showing how an activated ground floor level and podium rooftop facilities can be included in a future office tower development.

Future development to be undertaken in addition to construction of the office tower also includes street activation to Church and Argyle Streets, an upgraded and more architecturally attractive podium elevation to Argyle Street, enhanced public domain to Church and Argyle Streets, public art, provision of a raised paved threshold to the intersection of Argyle and Church Streets, improved pedestrian connectivity to Parramatta Square. Substantial Section 7.12 developer contributions will be payable to Council and can be utilised to fund initiatives proposed by Council for upgrading of the public domain around and near the Westfield Parramatta Shopping Centre.

The proposed building envelope includes space for a 2 storey high “transition” level above the retail podium. This transition level can include retail and café floor space and unenclosed publicly accessible space and facilitates integration with and access to the future approved additional retail level. The transition level includes adjoining landscaped open space for use by workers and shoppers. **Figure 6B**, below, shows how the transition level above the podium could present, as viewed from Argyle Street and includes a night-time view of an indicative office tower that can be accommodated within the proposed office tower envelop, above the transition level.



**Figure 6B –
View of the Indicative
Office Tower Form
above the Retail Podium**

No changes are proposed to the Concept Plan approval for the additional retail level and car parking spaces. The existing Concept Approval provides for 100 car spaces for the office tower component. The Modification Application retains 100 car spaces for the larger office tower envelope, to ensure minimal change to traffic generation and optimal use of public transport.

The proposed office tower, as modified, will assist in addressing the current undersupply of A Grade office floor space in Parramatta, contribute to employment growth within the Parramatta CBD, increase patronage of public transport, enhance the southern gateway to the Parramatta CBD and strengthen the role of Parramatta’s CBD as Sydney’s second CBD.

Plans of the proposed modified office tower envelope are included in Section 10 of the Urban Design Report, attached at **Appendix B**. These plans include floor plate plans, elevation plans, sections and 3D views.

The transitional provisions of the *Environmental Planning and Assessment Act and Regulations* apply to the proposed modification and retain the provisions of Section 75W of the former Part 3A of the *Environmental Planning and Assessment Act*, under which the original Concept Approval was issued in February 2014 by the Planning Assessment Commission of NSW, as delegate of the then Minister for Planning and Infrastructure.

Section 75W relates to Modification of Minister's approval and allows a proponent to request the Minister to modify the Minister's approval for a project where the project as modified is not consistent with the existing approval that has been issued.

The Environmental Assessment suitably addresses the assessment criteria prescribed in the NSW Planning and Environment Secretary's Environmental Assessment Requirements (SEAR's) issued on 29th September 2017. The Environmental Assessment demonstrates that the proposed office tower envelope, as modified, provides a viable tower envelope for an A Grade office tower, in a manner that will have no unreasonable or significant adverse impacts on the environment, or the amenity of the locality.

The Environmental Assessment has been prepared having regard to feedback received from public consultation and consultation with nominated government agencies and Parramatta Council, undertaken as part of the preparation of the Environmental Assessment. The Environmental Assessment includes a comprehensive site and urban design analysis justifying the proposed tower envelope height, setbacks and floor plate size and how it successfully relates to the built form of the existing and future character of the surrounding locality.

This Environmental Assessment prepared by Ingham Planning Pty Ltd, includes input from relevant specialist consultants, on behalf of the proponent, Scentre Group (formerly Westfield). The accuracy of the information contain in this report is to the best of our knowledge not false or misleading. The information and comments in this report have been based on information and facts that were correct at the time of preparation of this report in July2018.

1.2 Project Vision and Objectives

The project vision is to provide for a prestige high quality contemporary and environmentally sustainable A Grade commercial office development responsive to site location, constraints and setting and provide floor plates of sufficient size to meet the needs of major national and international tenants.

The future office building will be designed in accordance with ecologically sustainable development principles, provide A Grade quality commercial floor space with large floor plates and achieve a 5 GreenStar rating. The proposed office tower will be integrated into the existing retained Argyle Street retail podium and the planned additional retail level.

The urban quality of the locality will be enhanced through a more active street frontage to Argyle Street, improved public domain and pedestrian circulation, high quality building finishes and attractive contemporary building elevations

Project objectives for the office tower envelope are summarised as follows;

- Develop a high quality commercial building that provides A grade quality floor space in an energy efficient, sustainable 5 Green Star building, with suitable floor plate configurations that meet the “higher end” office market in Parramatta;
- Achieve a building height and landmark built form at the southern entry to the Parramatta CBD and compatible with development planned for the nearby Parramatta Square Precinct;
- Encourage use of public transport by taking advantage of the site’s proximity to the Parramatta Railway Station and Transport Interchange.
- Encourage pedestrian permeability and improved pedestrian connectivity to the Railway Station/Interchange, Parramatta Square and Church Street Mall
- Integrate the proposed office tower into the shopping centre retail podium and provide additional landscape public space on the podium
- Provide an active street frontage to Argyle Street and greater emphasis to the pedestrian entry at the corner of Church Street and Argyle Street.
- Optimise energy efficiency and ecological sustainability;

The subject land is a large strategic site within the Parramatta CBD, forming the southern gateway to the CBD and contains a major 5 retail level shopping centre. The Parramatta CBD is a regionally significant commercial centre and this major project has a substantial capital investment value (CIV). Accordingly, the originally submitted retail and office development proposal was recognised as a major project of regional significance and assessed and determined under the former Part 3A provisions of the *EPA Act*. The repeal of Part 3A of the Act included savings provisions for projects determined under Part 3A.

In addition to Section 1 – Introduction (above) of the Environmental Assessment Report and the preceding Executive Summary, the balance of the Environmental Assessment Report contains the following sections:

Section 2 identifies the proponent and the project consultant team.

Section 3 provides a description and analysis of the site, context and locality. Appendices A, B, C and D include a site survey plan and a site and context analysis.

Section 4 provides a detailed description of the project including built form, floor space, vehicular and pedestrian access, parking and the public domain. Appendices B, C and D include tower building envelope modification plans indicative concept plans of how a future tower could be developed on the site.

Section 5 outlines the Secretary’s environmental assessment requirements (SEAR’s) that must be addressed in the Environmental Assessment Report and includes a list of supporting plans and documentation.

Section 6 includes an assessment of key issues including matters such as environmental planning instruments, policies and guidelines; built form; urban design/public domain; environmental and residential amenity; transport and accessibility; parking; ecologically sustainable development; developer contributions; utilities; and a draft statement of commitments. Section 6 is supported by specialist consultant reports attached at Appendices B and E to W.

Section 7 provides details of and a response to Parramatta City Council's response to the Secretary's Draft SEAR's.

Section 8 provides a conclusion.

2. PROPONENT AND CONSULTANT TEAM

The Project Proponent is Scentre Group (formerly Westfield) and the project architect is a joint venture between Woods Bagot and Scentre Group Design & Construction. The consultant team assisting the proponent is as follows:

Ingham Planning P/L – Environmental Assessment & Statutory Planning

Woods Bagot – Urban Design, Architecture, Shadow Impact Analysis and 3D Modelling

Colston Budd Rogers & Kafes P/L- Traffic, Transport & Parking

JLL – Economic Impact Assessment

CUNDALL - Ecologically Sustainable Development

URBANEX - Project Surveyor

MGAC - Accessibility Assessment

Site Image – Landscaping

Richard Lamb and Associates – Visual and View Impact Analysis

WINDTECH – Wind and Reflectivity

VIPAC – Acoustics, vibration and odour assessment

NBRS Architecture – Heritage

Elton Consulting – Community Consultation

Enstruct Group P/L – Structural Engineers

Douglas Partners – Land Contamination Assessment

Westfield Design & Construction - Master planning and concept design

Westfield Design & Construction – Utilities and Services

3. SITE AND LOCALITY ANALYSIS

The subject land is in the southwest sector of the Parramatta CBD extending east and north to the corner of Church Street and Argyle Street, adjacent to the Parramatta Railway Station and Transport Interchange. The Parramatta CBD is effectively Sydney's second CBD and is identified as a Metropolitan City Centre in the Sydney Metropolitan Strategy. Parramatta City Centre LEP provides for high density development in the Parramatta CBD and further density and building height increases are anticipated in the soon to be exhibited Parramatta Draft LEP.

The following discussion addresses the site's regional and local context and site characteristics.

3.1 Regional context

The development site is located within the Parramatta Central Business District, 24 kilometres west of the Sydney CBD. Parramatta CBD is the primary business and retail centre for the Western Sydney Region with a workforce of more than 41,000. Parramatta is centrally located within the Sydney Metropolitan Region, some 21 kilometres northwest of the Sydney CBD and serves a population catchment of over 2 million people in western Sydney. The location of Parramatta CBD and the site within the metropolitan area is shown in Map 1, below.

MAP No. 1 - Site Location within the Sydney Metropolitan Area



The Parramatta CBD is identified as a Metropolitan City Centre in the Sydney Metropolitan Strategy – A Plan for Growing Sydney and is recognised as a transport and employment hub for western Sydney. Parramatta CBD is to be developed as Sydney's second CBD and is targeted to accommodate significant employment growth, with its workforce to increase by more 60% to 70,000 by 2036. The Parramatta City Centre LEP 2007 allows for a significant increase in building heights and densities within much of the Parramatta CBD to facilitate a major increase in commercial floor space to accommodate the planned increase of 27,000 jobs.

Westfield Parramatta is the southern gateway to the Parramatta CBD and occupies the southern half of the retail core of the CBD, strategically located adjacent to the Parramatta Railway Station and Transport Interchange and near the western edge of Council's Civic Place re-development that is proposed to extend west from Smith Street, to Church Street, on the northern side of the Western railway line. The site has convenient access to the CBD's arterial road network, including the Great Western Highway and O'Connell Street.

Currently the Parramatta CBD provides over 165,000m² (GLA) of retail floor space and is the largest retail centre in western Sydney. Some 115,000m² (GLA) of this retail floor space is located within Westfield Parramatta. The Parramatta City Centre is the third largest commercial office area in the Sydney Metropolitan Area, with some 685,000m² of office space. There is a significant presence of State and Federal agencies within the Parramatta CBD. Parramatta is also western Sydney's major centre for entertainment, education, health and cultural facilities.

3.2 Local Context - Parramatta CBD

The location and extent of the site, within the Parramatta CBD is shown in Map 2, below. The Westfield site is located predominantly between Argyle and Campbell Streets, extending from the Parramatta Railway Station and Interchange, west to O'Connell Street, on the southern side of the Western railway line. The proposed development is confined to that part of the site located west of Church Street, comprising a total area of 61,080m². **Map No. 2**, below shows the location of the site within the Parramatta CBD. **Figure 7** on the following page shows an aerial view of the site. And adjoining locality.

MAP No. 2 Site Location

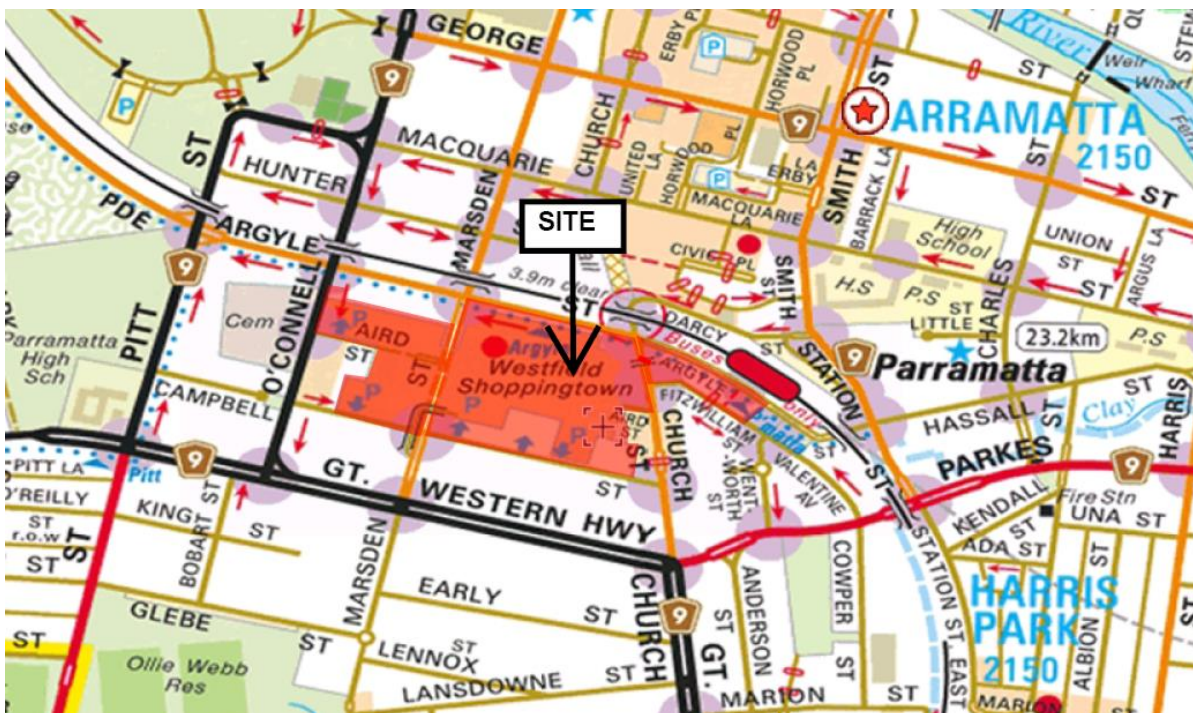
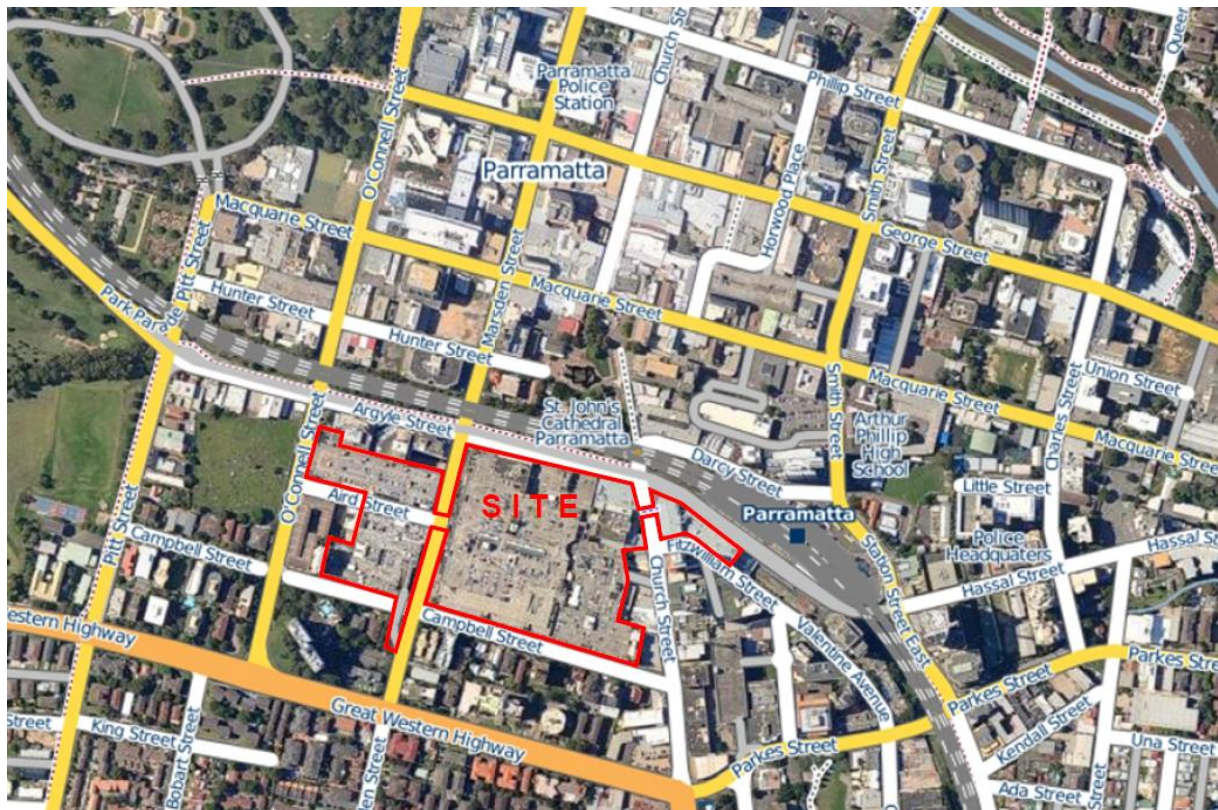


Figure 7 – Aerial View of Westfield Parramatta and the Locality



The local context of the site is characterised by commercial development to the north and east, within the Parramatta CBD, with predominantly residential development to the south and west, forming the southwest fringe of the CBD, extending to the Great Western Highway. Church Street is the CBD's "main" or "high" street in terms of retailing, with Westfield Parramatta forming the southern termination of this retail spine. The Western railway line splits the southern sector of the CBD from the core area of the CBD further north, forming a visual barrier at street level and constraining free flow of pedestrians between the CBD Core and CBD areas to the south of the railway line.

Development adjoining and near the site is described as follows:

To the north, on the northern side of the Western railway line, between O'Connell and Church Street, is medium to high rise commercial office development, with retailing at ground floor level predominating along Church Street.

Immediately to the northeast of the site is the Parramatta Railway Station and Transport Interchange and to the north of this facility, extending east from Church Street is the Parramatta Square redevelopment area. This area is currently being redeveloped for high rise commercial towers and a large public square. Several high-rise towers have been completed in the eastern portion of the redevelopment area.

Photo 1 – View of the Western Railway Line, Parramatta Railway Station, Transport Interchange & Office Towers located to the northeast of the site.



To the east of the site, on the eastern side of Church Street is the eastern portion of Westfield Shopping centre (incorporating retail and cinemas), ground floor retailing extending south along Church Street. Further south along George Street, in the area south of Fitzwilliam Street are medium to high-rise office towers and high rise residential towers. One of these residential towers is located at the southeast corner of Church Street and Fitzwilliam Street, above behind the heritage listed former fire station building.

Photo 2 – View of the existing streetscape of Church Street, south of the site, looking south past the existing Westfield pedestrian bridge over Church St.





Photo 3 – View looking northeast from Aird Street (east), of the 25-storey apartment tower at 140 Church St., located on the eastern side of Church St, at the Fitzwilliam Street intersection, above and behind the former fire station building.

To the southeast of the site on the eastern side of Church Street are predominantly commercial and mixed-use buildings, including 3 high-rise buildings. To the south of the site, on the western side of Church Street are low rise commercial/retail development extending south along Church Street, to the intersection of Church Street with the Great Western Highway.

Photo 4 – View looking east from Aird Street of the existing 13 storey office building located at 126 Church Street and the adjoining high-rise apartment building at 118 Church Street, also located on the eastern side of Church Street.



Further to the south and southwest of the site, on the southern side of Campbell Street is medium to high rise residential apartment buildings. A two-storey heritage item “David Lennox’s house” is located at 39 Campbell Street.

Photo 5 – View of medium & high-rise apartment buildings on the southern side of Campbell Street, opposite the Westfield Campbell Street car park. The single storey heritage item “David Lennox’s House” is shown at right in the photo.



Photo 6 – View of existing street trees and large multi-storey apartment buildings located on the southern side of Campbell Street, extending east from O’Connell Street, opposite the existing Westfield Campbell Street car park.



To the west of the site, on the southern side of Aird Street West is a 5-storey office building and a 3-storey apartment building. To the west of the site on the northern side of Campbell Street is a 10-storey mixed use building.

Further to the west is a 3-storey mixed use building (ground floor commercial with 2 storeys of residential above), fronting O’Connell Street (see Photo 7 below) and further to the west a heritage listed cemetery on the eastern side of O’Connell St.

Photo 7 – Existing 3 storey mixed use building in Aird & Campbell Streets, located to the west of the site, as seen looking southeast from Campbell St.



Further to the west, located south of the Western railway line, is low rise primarily commercial development extending west from O'Connell Street, to Parramatta High School. Further to the northwest is Old Government House and the Parramatta regional parklands.

To the north of the existing Westfield's Aird Street car park, on the southern side of Argyle Street, between Marsden Street and O'Connell Street are medium rise office buildings of up to 10 storeys in height.

Photo 8 - View of existing medium rise commercial office buildings located in Argyle Street on the northern side of the existing Westfield Aird Street car park, as seen looking southwest from the intersection of Argyle St. & O'Connell St.



3.3 The site

Westfield Shopping Centre Parramatta comprises two land parcels extending either side of Church Street east-west along Argyle Street. Proposed development is confined to the main portion of the Westfield site, located west of Church Street (Lot 2 DP 851525), which has a total area of 61,080m². This parcel contains the Centre's car parking and most of the retail floor space and extends west from Church Street across two blocks to O'Connell Street. The smaller parcel, located on the eastern side of Church Street (see Site Plan below), extends to the east between the transport interchange and Fitzwilliam Street and contains shops and cinemas.

The two parcels are connected by a pedestrian bridge across Church Street, located midway between Argyle Street and Fitzwilliam Street. A pedestrian and vehicular bridge also extends across Marsden Street connecting the central and western sectors of the shopping centre. The proposed office tower has frontage to Argyle Street and is located mid-way between Church Street and Marsden Street. An aerial view of Westfield Parramatta and the location of the proposed office tower envelope (labelled as SITE) is shown below in **Figure 8**.

Figure 8 – AERIAL VIEW OF SITE



Westfield Parramatta comprises a 5-level retail mall and parking levels providing for a total of 4,428 car spaces. Facilities provided on site, in addition to retailing include food courts, an 8-screen cinema complex, banks and other services. Major retail outlets include Department stores and David Jones, discount department stores (Target and K Mart) and 2 supermarkets (Coles and Woolworths). A 3-level office building (4,608m² GFA) is located above the northeast corner of the retail podium.

The site has primary street frontages of 195m to Argyle Street, 76m to Church Street and 330m to Campbell Street. Secondary street frontages exist to Marsden Street, Aird Street, O'Connell and Fitzwilliam Street. The subject land has a modest fall of some 12.8m from the southwest corner in O'Connell Street (RL 24.2) to the southwest corner of Church and Argyle Streets (RL 11.43). The site is fully developed across the whole of the site, with a maximum height of 36m where the existing office building extends above the retail podium. The main portion of the existing shopping mall, west of Church Street, has 6 levels of shops and services.



Photo 9 - View of the Westfield retail podium located at the southwest corner of Church Street and Argyle Street. The office tower envelope, as currently approved, is proposed to be located above this retail podium, setback from the corner of Argyle and Church Streets.



Photo 10 - View of the Department store Argyle Street elevation, located approximately mid-way between Church Street and Marsden Street. The office tower envelope, as modified, is proposed to be located above the Department Store and this Department Store re-configured.



Photo 11 - View of the southern side of Argyle Street, generally west of Marsden Street. There are opportunities to create retail display windows in the northern ground floor elevation, where the entry lobby to the office tower is proposed to be located.



Photo 12 -. View of the site looking southwest from Argyle Street, at the corner of Marsden Street, showing the existing Argyle Street frontage of the site, extending east to Church Street.



Photo 13 - View of the existing footpath and colonnade fronting the Department Store in Argyle Street.



Photo 14 - View of Westfield Campbell Street Car Park, as seen looking northeast from Campbell Street, from Campbell Street, at the corner of Marsden Street.



Photo 15 - View of Westfield Aird Street Car Park, and existing bridging over Aird Street, as seen looking east down Aird Street, from O'Connell Street.



Photo 16 – View of Marsden Street loading docks looking north from Argyle Street, towards the existing mall/vehicle bridge over Marsden Street.



Photo 17 - View looking southeast from the existing roof parking level, fronting Campbell Street, of existing residential apartment towers in Campbell Street.



Photo 18 – View looking southwest from Church Street, of the intersection of Aird Street (East) and Church Street and the Westfield Aird Street loading dock. Existing 2 storey commercial buildings fronting Church Street are located each side of Aird Street.

Site Analysis

A Site and Context Analysis is included at **Appendix B**. This Report provides a detailed assessment and analysis of the site including constraints and opportunities, adjoining development, access, topography, drainage and environmental and amenity influences such as noise sources, prevailing winds, aspect, solar access, shadows and views. The Site and Context Analysis identifies how the proposed building envelope responds to the site and its context, including its interface to residential development, primarily to the south and west.

The site analysis indicates the following site features and issues that impact on and inform the design process:

- Strategic location near the southern gateway to the Parramatta CBD and Church Street retail precinct and the Parramatta Transport Interchange.

- The site is readily accessible to public transport and the arterial road system and is adjacent to the main Western Railway Line;

- The Parramatta CBD is a regional hub for shopping, services, entertainment, office employment and high-density housing.

- The site is close to existing and planned high-rise buildings in Church Street and Parramatta Square.

- Locality has varied land use, architecture, density, subdivision pattern and built form height, setbacks, scale and style;

- The character of the area is predominantly commercial to north and east and predominantly residential to the west and south, with a range of building heights from low rise 2 storey, to high rise of up to 25 storeys.

- The site is of significant size (more than 6 hectares), with multiple road frontages and can accommodate increased development density without adversely impacting on amenity or precinct character.

- The site contains a large scale commercial development comprising a major 5 level retail shopping mall that is suited to accommodating an office tower of the scale proposed, above the Department store tenancy, fronting Argyle Street.

- The design avoids adverse impacts on heritages items in Campbell Street, Church Street, O'Connell Street and other nearby locations.

- Some adjoining sites are significantly underdeveloped and may be expected to be redeveloped in the medium to long-term. Planning Proposals have been submitted for high rise mixed use towers for at least 2 neighbouring sites.

No significant public open space or community facilities exist near the site, nor are there any important view corridors across or near the site;

The existing railway corridor and bus lanes/facilities are unaffected by the proposed office tower envelope.

The site has a gentle slope and does not contain any vegetation or watercourses;

Mature large street trees are evident around the site and there is an opportunity for some additional street tree planting.

The site has several vehicular entry/exits and loading access is available to the office tower envelope from Marsden Street (east side near Argyle Street).

The site has long frontages to the north and south. Potential overshadowing to the south is a development constraint. Care has been taken to maintain adequate solar access to apartments located to the south and southeast of the site.

An apartment building adjoins the Westfield site to the west in Campbell Street.

Opportunities are available to enhance the public domain and pedestrian connectivity, as well increasing street activation to Argyle Street and create a new pedestrian entry from Argyle Street.

4. THE PROPOSED S75W MODIFICATION

A Concept Approval for Major Project MO_0068 Westfield Parramatta was issued by the Planning Assessment Commission of NSW on 20th February 2014 for additions to the shopping centre, incorporating the following components:

- 31,495m² (GFA) of retail additions and associated internal modifications;
- Building envelope for commercial tower above retail podium incorporating up to 35,000m² (GFA) commercial floor space;
- Parking for 562 vehicles;
- Associated public domain works; and
- Road infrastructure works to support the development.

The proposed modification (Modification 1) relates only to the approved building envelope for the commercial tower above the retail podium and is submitted pursuant to Section 75W of the former Part 3A of the Environmental Planning and Assessment Act 1979 (EPA Act).

The proponent, Scentre Group, has since approval of the original Concept Plan office tower building envelope, explored opportunities in the marketplace to attract suitable international and national corporations to Parramatta, to occupy the future office tower, as approved in the Concept Plan. Feedback from this process indicates that such major prospective tenants require larger floor plates and total floor space more than the 35,000m² floor space allowed for in the current Concept Plan Approval.

The existing Concept Plan Approval provides for a 25-storey office tower envelope with floor plates of up to 1,400m² above the existing 5 storey retail podium, located on the southwest corner of Church Street and Argyle Street. It is not possible to accommodate the proposed taller and larger office tower envelope in this location, due to building, floor layout and operational and structural constraints imposed by the existing retail podium at this corner of the site.

It is not viable to demolish the existing 5 storey retail podium to accommodate a taller and larger office tower envelope. Structural investigations have indicated that it is feasible to undertake building alterations and structural enhancements to the retail podium, further to the west, in the current location of the Department store, to provide for a taller office tower with larger rectangular floor plates.

Future construction of the office tower building will include reconfiguration of the various floor levels of the Department store below, provision of a ground floor level office tower lobby to Argyle Street, an activated street frontage comprising retail/café uses. At the existing retail podium roof level there is potential for a 2-storey height, partially open-air podium with additional retail/café space and landscaping enabling connectivity to the approved additional retail level.

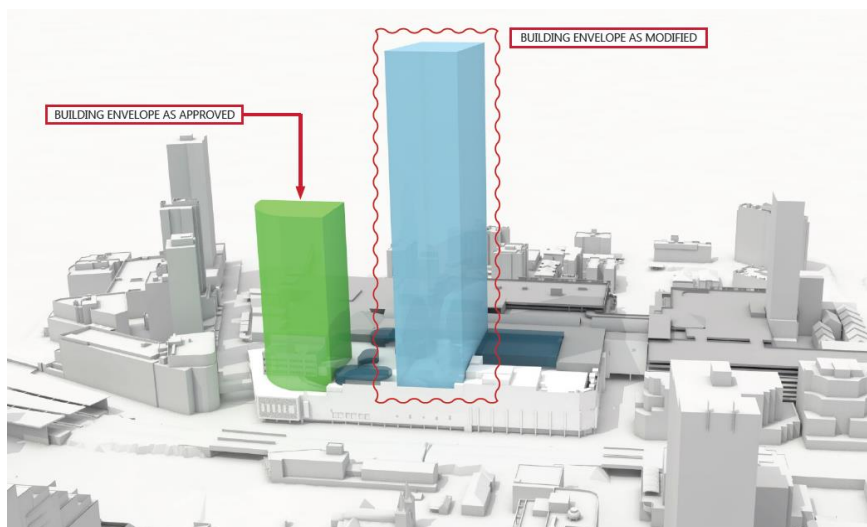
4.1 Modification of Office Tower Envelope

Modification 1 seeks approval for the following changes to the office tower envelope, as currently approved:

- Increase total assessable commercial gross floor area (GFA) from 35,000m² to 112,000m²;
- Increase the number of office levels from 25 to 41 plus a mid-tower transfer/service level and roof plant level.
- Change the tower form to a generally rectangular shape, as illustrated in the enclosed plans, with a 38.7m wide elevation to Argyle Street
- Increase the maximum permitted building height of 120m above ground level to a maximum of 188m above ground level (maximum RL 220).
- Provide an unenclosed transition level up to 2 storeys height above the existing 5 storey retail podium, to be integrated with the approved additional retail level.
- Increase maximum office tower building envelope floor area from 1,800m² to 3,025m² for the 39 office tower floor levels above the 2-storey office tower podium.
- Relocate the building envelope further to the west to provide an office tower setback of 79m to Church Street, with a 3m 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 Argyle Street.

Figure 9A, below shows a 3D comparison view, from the north, of the office tower envelope as currently approved (coloured green at left in the view) and the proposed office tower envelope (coloured light blue at right in the view), as sought to be modified

Figure 9A – 3D Comparison View of Approved and Proposed Tower Envelopes



Plans of the office tower envelope, as approved and as modified, are included in Section 10 of **Appendix B**. **Figure 9B**, below shows a plan view of the site showing the location of the currently approved tower envelope (in green dotted lines) and the location of the proposed tower envelope (in light blue dotted lines), as modified, further to the west, above the existing Department store. The area on the plan shown coloured grey is the location of proposed Level 6 retail that has been approved pursuant to the Project Approval. No changes to the Project Approval plans are proposed.

Figure 9B – Location Plan – Approved and Proposed Office Tower Envelope Locations

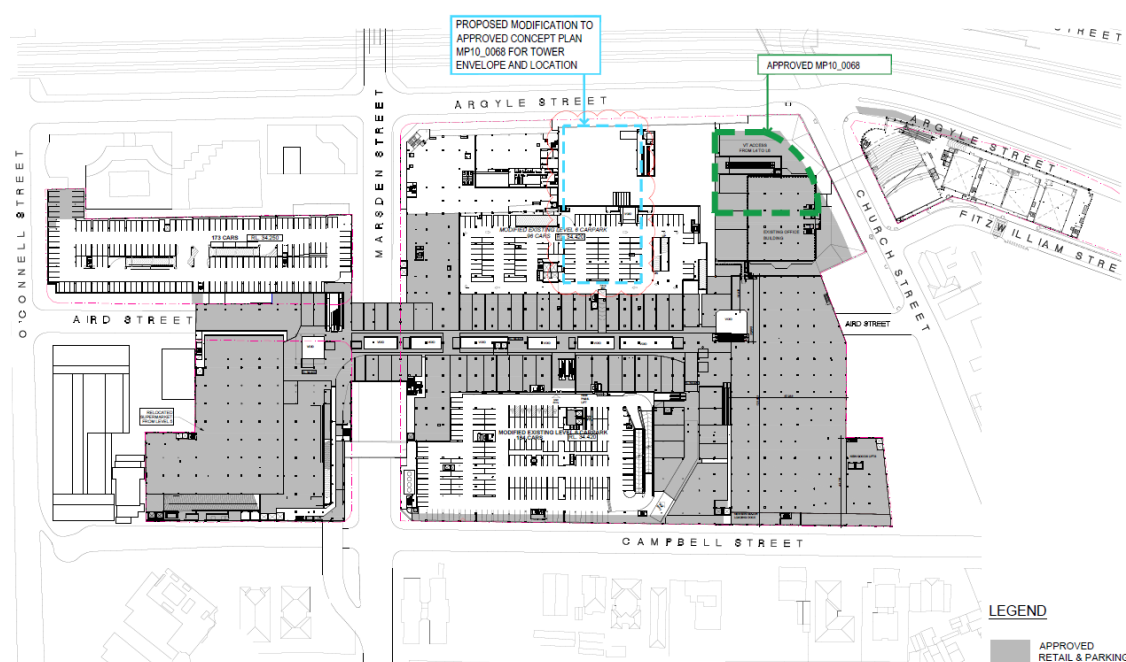


Figure 9C, below shows an elevation view from Argyle Street, looking south, of the modified office tower envelope in the location proposed further to the west of the current approved office tower envelope, which is shown with green dotted lines.

Figure 9C – Argyle Street Elevation View of the Modified Office Tower Envelope

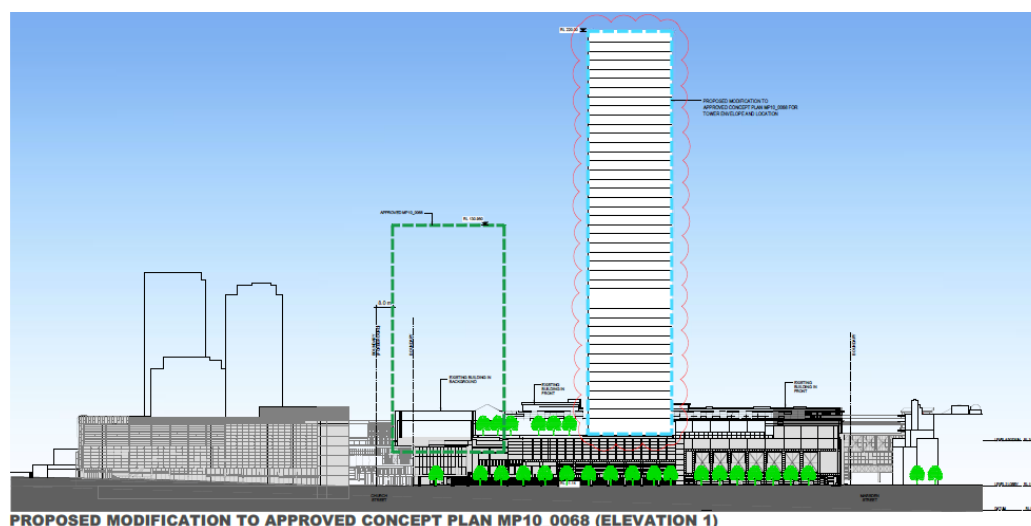
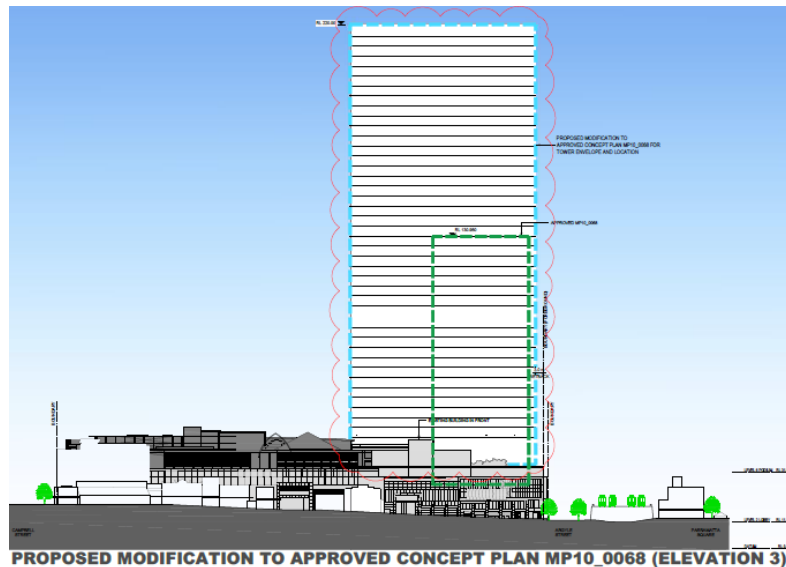


Figure 9D, below, shows an elevation view from Church Street of the currently approved tower envelope (green dotted lines) and the office tower envelope, as proposed to be modified (light blue dotted lines)

Figure 9D – Church Street Elevation View of the Modified Office Tower Envelope



The Modification Application requests approval to amend the Concept Approval Conditions as set out below .

Development Description

Condition A1 is amended to delete the figure “35,000m2” in the last dot point and insert the figure “112,000”

Development in Accordance with Plans and Documentation

A new condition A2(A) is to be inserted as follows:

A2(A) The modified office tower building envelope, as approved pursuant to Modification 1 shall be undertaken generally in accordance with:

- The Environmental Assessment dated July 2018 prepared by Ingham Planning, including all associated documents and reports;
- The Draft Statement of Commitments prepared by Ingham Planning dated July 2018;
- The following drawings prepared by Scentre Group;

<i>Drawing No.</i>	<i>Name of Plan</i>	<i>Date</i>
DA01-2070	Envelope Plan	July 2018
DA01-5201	Floor Plan – Level 1	July 2018
DA01-5202	Floor Plan - Level 2	
DA01 5203–	Floor Plan – Level 3	
DA01-5204	Floor Plan – Level 3M	
DA01-5205	Floor Plan – Level 4	
DA01-5206	Floor Plan - Level 4m	
DA01 5207–	Floor Plan – Level 5	

DA01-5208 DA01 5209 DA01-5210 DA01-5211 DA01 5212– DA01-5213 DA01 5214	Floor Plan - Level 5M1 Floor Plan – Level 5M2 Floor Plan – Level 6 Floor Plan - Level 6m Floor Plan – Level 7 Floor Plan – Level 7M Floor Plan - Level 8	
DA01-3201 DA01 3202 DA01-3203 DA01-3204	Proposed Elevation Argyle St Proposed Elevation Campbell St Proposed Elevation Church St Proposed Elevation O’Connell St/Marsden St	July 2018
DA01- 5401 DA01- 5402 DA01- 5405	Section AA Section CC and Section DD Section BB	July 2018
DA01-5501 DA01-5502 DA01-5503	3D Perspective 1 3D Perspective 2 3D Perspective 3	July 2018

Maximum Gross Floor Area (GFA)

Condition A5 is deleted and replaced with the following re-worded Condition A5.

The maximum GFA for the development shall not exceed 143,495m² comprising a maximum of:

- 31,495m² retail GFA; and
- 112,000m² commercial GFA.

Car Parking

Condition A6 is amended by deleting the number “562” and replacing this with the number “289”.

Building Envelope

Condition B1 is deleted and Condition B2 re-numbered as Condition B1.

Schedule 3 Future Environmental Assessment Requirements

The heading “**Built Form**” and Conditions 3 and 4 are deleted.

4.2 Indicative Concept Plans Office Tower Built Form and Associated Enhancements

The proposed tower envelope provides for the future design of an A grade large floor plate high rise office tower, designed to respond to function, context and market demand. The design of the planned landmark office tower will be the subject of a future architectural design competition to be undertaken prior to submission of the development application for the tower.

The modification application is accompanied by an indicative tower form to demonstrate how a future office tower could be suitably accommodated within the proposed envelope. An indicative concept plan is included for the ground floor lobby of the office tower, which includes café/retail tenancies fronting Argyle Street and pedestrian connections to the existing retail level (Level 2) of the shopping centre.

An indicative concept plan is also included for the rooftop terrace level (Level 6) below the planned office tower, extending as an open plaza to connect with the approved, yet to be constructed, additional retail level (Level 6). The rooftop terrace area can include cafes and retail outlets, in place of retail floor space that must be reduced in the existing 5 storey podium to provide for the office tower vertical transport core and re-configuration of the Department store.

Indicative concept plans for a future office tower, the ground floor level to Argyle Street and the rooftop terrace level, are attached at **Appendix B**.

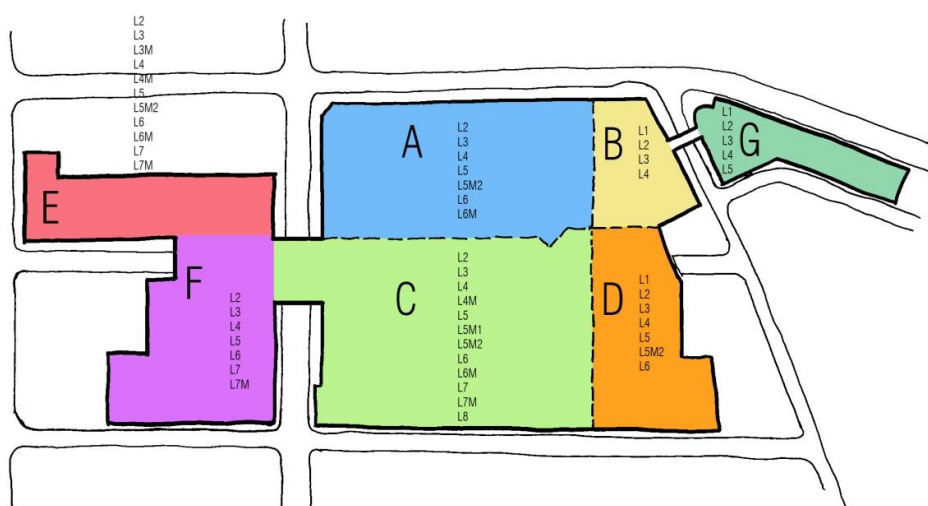
The public domain, pedestrian and street activation improvement and enhancement of existing retail podium facade near the proposed office tower will be undertaken as part of the construction of the office tower.

Public domain improvements include new paving, street furniture, landscaping and outdoor dining to Argyle Street, between Church Street and Argyle Street, paving of the Church Street/Argyle Street intersection to make it more pedestrian friendly, enhancement of the pedestrian environment under the existing railway overpass and provision of a raised pedestrian paved threshold across the road pavement of Aird Street (east end) at Church Street.

The existing retail podium elevation, extending between the pedestrian bridge in Church Street (west side) extending around into Argyle Street, west to Marsden Street will be upgraded to provide a more attractive and activated frontage to those streets.

The existing shopping centre is divided into 6 zones, A, B, C, D, E, and F, as shown in the following **Figure 9E** below, for locational referencing within each floor level of the shopping centre. The office tower envelope, as modified, will be located within the central portion of Zone A, extending south from Argyle Street.

Figure 9E Westfield Shopping Centre Locational Zones



Concept plans for public domain improvements are also included with the development plans at **Appendix D** and have regard to the public domain improvements proposed for the locality in Council's Parramatta City Centre Civic Improvement Plan. The concept plans will be further developed in consultation with Parramatta Council and NSW Planning, prior to the architectural design competition and preparation of architectural plans for the office tower.

5. SECRETARY'S ENVIRONMENTAL ASSESSMENT REQUIREMENTS

The following table provides the Secretary's Environmental Assessment Requirements (SEAR's) issued 29/09/2017) and a reference as to where they are addressed in the report.

Secretary's Requirements		
Key Issues	Secretary's Requirements	Reference
1. Environmental Planning Instruments, Policies and Guidelines	Address the relevant statutory provisions that would apply if those provisions applied to the carrying out of the project, including the following:	
	• State Environmental Planning Policy (State and Regional Development) 2011	Section 6.1.9.3
	• State Environmental Planning Policy No. 55 – Remediation of Land	Section 6.1.9.1
	• State Environmental Planning Policy (Infrastructure) 2007	Section 6.1.9.2
	• NSW State Priorities	Section 6.1.2
	• A Plan for Growing Sydney	Section 6.1.3
	• Towards our Greater Sydney 2056	Section 6.1.4
	• Draft West Central District Plan	Section 6.1.5
	• Parramatta Local Environmental Plan 2011	Section 6.1.6
	• NSW Long Term Transport Master Plan	Section 6.1.10.1
	• NSW Planning Guidelines for Walking and Cycling	Section 6.1.10.10
	• Sydney's Walking Future 2013	Section 6.1.10.5
	• Sydney's Cycling Future 2013	Section 6.1.10.6
	• Sydney's Bus Future 2013	Section 6.1.10.7
	• Sydney's Rail Future 2013	Section 6.1.10.8
	• Development Near Rail Corridors and Busy Roads 2008	Section 6.1.10.11
	• Guide to Traffic Generating Developments (RMS)	Section 6.1.10.2
	• EIS Guidelines – Road & Road Related Facilities	Section 6.1.10.3
	• Guide to Traffic Management Part 12 (AUSTROADS)	Section 6.1.10.4
2. Built Form and Urban Design	• Include a detailed justification for proposed tower relocation, increases in GFA, height and floor plate size with 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.	Section 6.2 and Appendices B & C
	• Provide a table identifying the proposed development's different land uses including a floor-by-floor breakdown of GFA, total GFA and site coverage.	Section 6.2 and Appendix B
	• Identify any change to the use and/or layout of the site and development and associated impacts on circulation movements, access and linkages.	Section 6.2 and Appendices B & C
	• Address the proposed relationship between the street level entrance lobby and adjoining retail.	Section 6.2 and Appendices B & C
	• Address any approval/s required under the Airports Act 1996 due to the proposed height of the commercial tower.	Section 6.2
3. Amenity	• Justify the proposal in terms of impacts on view loss, sunlight/overshadowing, wind impacts, reflectivity, visual and acoustic privacy, and safety and security to achieve a high level of environmental amenity, particularly regarding residential properties to the south.	Section 6.3 and Appendices B, L, O, Q & S

Secretary's Requirements		
Key Issues	Secretary's Requirements	Reference
4. Visual Impacts	<ul style="list-style-type: none"> A detailed 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. 	Section 6.4 & Appendix L
	<ul style="list-style-type: none"> 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. 	Section 6.4, 6.6 and Appendices L & R
5. Traffic, Car Parking, Transport and Access (Operation)	<ul style="list-style-type: none"> Include a Transport and accessibility impact assessment prepared in accordance with the relevant guidelines identifying: <ul style="list-style-type: none"> Daily and peak hour traffic generation, public transport, walking and cycling trip generation during construction and operation; Existing and proposed pedestrian and bicycle routes and facilities; The adequacy of public transport, pedestrian and bicycle provisions to meet the demand of the proposed development; The impact of traffic generated on nearby intersections and any road infrastructure works required, considering cumulative impacts from other developments in the area; Measures to encourage sustainable travel and non-car mode share, (e.g. implementing a sustainable travel plan and end of trip facilities); Proposed bicycle and car parking provision demonstrating compliance with relevant RMS guidelines and Australian Standards; and Proposed access arrangements including service and emergency vehicles. The Environmental Assessment (EA) shall include a Construction Traffic Management Plan and a Transport Management and Accessibility Plan based on the findings of the transport and accessibility impact assessment. 	Section 6.5 and Appendix K
6. Heritage	Include a Heritage Impact Statement (HIS) prepared by a qualified Heritage Consultant which, in conjunction with the VIA (see point 4) 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.	Section 6.6 and Appendix R
7. Public Domain and Public Access	<ul style="list-style-type: none"> 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. 	Section 6.7 and Appendices B & D
	<ul style="list-style-type: none"> Include a Public Domain Upgrade Plan for the project covering the street edges of Church, Argyle, Marsden, Aird and Campbell Streets. 	Appendix D
8. Economic Justification	<ul style="list-style-type: none"> Provide economic and market analysis to justify the proposed variation to the approved concept tower form. . 	Section 6.8 and Appendix E

Secretary's Requirements		
Key Issues	Secretary's Requirements	Reference
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.	Section 6.9 and Appendix P
10. Developer Contributions	Provide the scope of developer contributions proposed.	Section 6.10
11 Utilities	<ul style="list-style-type: none"> 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. . 	Section 6.11 and Appendix F
	<ul style="list-style-type: none"> Identify and potential impacts on existing utility infrastructure and service provider assets and demonstrate how these will be protected or impacts mitigated. . 	Section 6.11 and Appendix F
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.	Section 6.12 and Appendix M
13. Statement of Commitments	The EA must include a Statement of Commitments detailing measures for environmental management, impact mitigation and ongoing monitoring.	Section 6.13
Consultation	<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. You should consult with:</p> <ul style="list-style-type: none"> The City of Parramatta Council; Roads and Maritime Services; Transport for NSW; The Office of Environment and Heritage; Sydney Water; Sydney Trains; Civil Aviation Safety Authority; and Air Services Australia. <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>	Section 6.13 and Appendices I, W and X

The Secretary's requirements include an attachment for information only, outlining Government Authority Responses for Key Issues. Responses were attached to the Secretary's Requirements, from Parramatta City Council (received after the issue of SEAR's), the NSW Roads and Traffic Authority (now Roads and Maritime Services) and the NSW Department of Transport. Copies of those responses are attached at **Appendix X**, together with a copy of the Secretary's Requirements for the proposed modification.

Parramatta City Council sought inclusion of issues relating to consultation strategy, timing of public domain works, architectural design competition for the tower, potential impacts on helicopter flights (Westmead medical precinct), and infrastructure to accommodate changes in motor vehicle technology.

Council has also identified additional planning instruments and guidelines that should be addressed and additional documentation that should be submitted e.g. 3D shadow analysis, wind and noise impacts, commercial and retail floor space demand analysis, construction management plan, public domain plan and a signage strategy.

Matters raised by Council that have not been included in the Director General's requirements or included in the assessment of key issues contained in Section 6 of the EA Report are identified and assessed in Section 8 of the EA Report.

The NSW Department of Transport has requested that transport assessment include trip generation, travel demand management, State Plan targets for walking, cycling and public transport, impacts on Parramatta Transport Interchange, road treatments, connectivity to the site, bicycle facilities, work place travel plan and transport access guidelines.

The Department of Transport has identified plans and policies such as Integrating Land Use and Transport, Planning Guidelines for Walking and Cycling, The NSW Bike Plan and the Healthy Urban Development Planning Checklist (NSW Health) that should be considered. The Department has also requested consultation with Rail Corp where any excavation greater than 2m in depth is proposed within 25m of the rail corridor and preparation of a Construction Traffic Management Plan.

In relation to parking provision, the Department of Transport recommends that a minimalist approach to parking supply and innovative management be adopted to achieve State Plan targets as well as strategic planning objectives for the Parramatta City Centre. Parking strategy should consider existing and planned enhancements to public transport, walking and cycling and have regard to best practice.

The NSW Roads and Traffic Authority (RTA), in relation to traffic impact request that the proponent address both the supply of transport services and measures to manage demand for car use and promote travel choices other than private car travel. The RTA requires that daily and peak traffic movements likely to be generated be identified and impacts on nominated nearby intersections, including any road improvement works, be modelled and addressed.

The RTA has requested that the traffic analysis address the implementation of several suggested changes to the nearby road system identified by the RTA. The traffic assessment is also to include details of proposed accesses and parking provision and confirm compliance with relevant Australian Standards. The RTA recommends that parking provision be kept to a minimum. The RTA has raised several other issues relating to traffic and transport, such as service vehicle movements, adequacy of parking during construction, pedestrian safety, public transport accessibility and cumulative traffic impacts.

Matters raised by the RTA (now Roads and Maritime Services) and the NSW Department of Transport are addressed in the assessment of key issues in Section 6.5 of the EA and in the Traffic Report, attached at **Appendix K**.

The following table sets out the Secretary's requirements in relation to plans and documentation that is required to be submitted with the Modification Application.

General Requirements, Plans and Documents to Accompany the Application		
<i>General</i>	<i>The Modification Application must include:</i>	<i>Provided on Page 1 of the Report</i>
	<ul style="list-style-type: none"> An Executive Summary 	
	<ul style="list-style-type: none"> A description of the existing and surrounding environment. A thorough description and justification of the proposal, including: <ul style="list-style-type: none"> A detailed justification for proposed increases in GFA, height and floor plate size; Identification and analysis of alternatives, for the additional commercial floor space, and environmental impacts; and Description of the public benefits arising from the proposal. Consideration of any statutory provisions (see below). A detailed assessment of the key issues specified below, including: <ul style="list-style-type: none"> A description of the existing environment; and An assessment of the potential impacts of the modifications, including cumulative impacts. An amendment to the approved Statement of Commitments (where relevant). A conclusion justifying the proposal, taking into consideration the environmental impacts of the proposal, and the suitability of the site. 	Sections 1 and 3 of the Report & Appendices B E
<i>Plans and Documents</i>	<i>The following plans and relevant documentation shall be submitted.</i>	
	1. An existing site survey plan drawn at an appropriate scale illustrating: <ul style="list-style-type: none"> 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; and all levels to be Australian Height Datum (AHD). 	See Appendices A & C
	2. A locality/context plan drawn at an appropriate scale should be submitted indicating: <ul style="list-style-type: none"> 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; and Traffic and road patterns, pedestrian routes and public transport nodes. 	See Appendix B a & large size plans enclosed separately
	3. Drawings at an appropriate scale illustrating: <ul style="list-style-type: none"> 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; detailed plans, sections and elevations; the height (AHD) of the proposed development in relation to the land; and any changes that will be made to the level of the land by excavation, filling or otherwise. 	See Appendices B and C

General Requirements, Plans and Documents to Accompany the Application		
	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 9.00am, 12.00 midday and 3.00pm. Existing and proposed shadow diagrams shall be provided for all affected residential buildings, particularly No. 140 Church Street.	See Appendix C
	5. 3D modelling of the proposal and the surrounding development in digital format in accordance with the relevant guidelines.	See Appendix B & C
	<p>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.</p> <p>Visual assessment methodology</p> <ul style="list-style-type: none"> 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). As 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. <p>Visual catchment</p> <ul style="list-style-type: none"> 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. 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. Photos are required for representative view categories, plotted on a map. <p>Visual material</p> <ul style="list-style-type: none"> Reference to be made to site analysis. Provide key plan indicating where viewpoints are located and narrative explaining why these have been selected. The modified and approved built form should be illustrated in the context of the visual catchment to enable assessment of the visual impact. 	See Appendix L

General Requirements, Plans and Documents to Accompany the Application		
	<ul style="list-style-type: none"> 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. Vertical exaggeration should provide an accurate rather than 'flattened' impression of buildings in the context of the visual catchment. 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. Assessment must benchmark against the existing situation and currently approved plans. 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. As above, support visual evidence such as cross sections to be drawn to realistic scales and shown in context. 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. 	
	7. Wind Impact Assessment including tunnel modelling.	See Appendix O
	8. Traffic and Transport Impact Assessment.	See Appendix K
	9. Public domain interface plan.	See Appendices B & D
	10. Heritage Impact Statement.	See Appendix R
	11. Transport Management and Accessibility Plan.	See Appendix K
	12. Conceptual Water Management Plan.	See Appendix F
	13. Conceptual Infrastructure Servicing Plan.	See Appendix F
	<ul style="list-style-type: none"> Shadow Diagrams Stormwater Concept Plan Erosion and Sediment Control Plan View Analysis Construction Management Plan and Traffic Management Plan Construction Methodology 	<p>See Appendices C</p> <p>See Appendix F</p> <p>Not Required (no works)</p> <p>See Appendices B & L</p> <p>Not Required (no works)</p> <p>Not Required (no works)</p> <p>Structural Engineer's Report Provided at Appendix N</p>

6. ASSESSMENT OF KEY ISSUES

Section 6 of this Environmental Assessment provides an assessment of the project in relation to the key issues identified in the Secretary's Requirements (SEAR's). Relevant supporting specialist reports are identified in relation to the issues and included as Appendices. The following table provides a summary of how the Secretary's key issues have been addressed in the proposed development.

TABLE 2 – SUMMARY OF KEY ISSUES

KEY ISSUE	COMMENTS
1. <i>Relevant EPI's policies and Guidelines</i>	Section 6.1 of the EA report provides an assessment of the proposal against relevant Local Environmental Plans, Development Control Plans, planning policies, strategies and guidelines. The proposal generally accords with planning strategies and policies for the Parramatta CBD.
2. <i>Built Form/Urban design</i>	<p>The proposed office tower envelope extends to a height of up to 210m, which is well above the existing 36m maximum height control. However, Parramatta City Council, in Draft PLEP 2016 proposes to remove this height control and identify the site within an area to which no height control will apply. Having regard to this proposal and the nearby existing and proposed high-rise tower buildings and the urban design benefits of providing a landmark building in a strategic location within the CBD, near the Parramatta Rail and Bus Interchange.</p> <p>The tower building, is setback more than 70m from Church Street and 3m to the Argyle Street frontage. This is appropriate given the retention of the existing 3m wide colonnade below, and the street interface, which is to a railway embankment, rather than other tall buildings.</p> <p>An architectural competition will be held to ensure a high-quality building design.</p>
3. <i>Amenity</i>	Apartments in the locality will continue to receive adequate-winter solar access between 9am and 3pm. Significant separation distance is provided to residential buildings. There is no adverse visual or aural privacy impacts and a limited and acceptable impact on views from and solar access to, residential buildings in the locality, having regard to the high-density CBD context. The proposed office tower will become part of the emerging high-rise skyline of the CBD.
4. <i>Visual Impact</i>	The proposal will have a limited and acceptable visual impact and will not adversely impact on any significant view lines/corridors. As noted above, the proposed tower will become part of the emerging high rise skyline of the CBD and will be visually subsumed into this cityscape.
5. <i>Traffic, Car Parking, Transport and Access (Operation) and Transport Impacts (Operational)</i>	<p>The site is well served by public transport, including regular and frequent rail and bus services adjacent to the site. Substantial multi-deck car parks are also located on the site. By limiting the amount of additional on-site parking, additional traffic is minimised.</p> <p>Traffic generation during the commuter peak periods is anticipated to be no greater than for the office tower envelope, as currently approved. Peak hour traffic generation is within the capacity of the existing road system in the Parramatta CBD, with some minor intersection improvements, currently underway.</p> <p>A Transport Management and Accessibility Plan is attached at Appendix K. A Construction Management Plan to be submitted with the DA will provide arrangements for managing parking and construction traffic during the construction phase.</p>

	<p>Council's parking requirements are prescribed as a maximum parking provision, with encouragement given to a reduced parking provision on sites such as the subject land that a readily accessible to regular and frequent high capacity public transport services.</p> <p>Proposed office parking of 100 car spaces accords with the principle of minimising off-street parking, as this parking provision is considerable less than the maximum permitted for an office tower of 112,000m² GFA. The proposal includes additional bicycle parking to further discourage use of private motor vehicles as the means of accessing the site.</p>
6. <i>Heritage</i>	<p>There are several heritage items near the site including Parramatta Railway Station, the old fire station in Church Street, David Lennox's house at 39 Campbell Street, the Masonic Centre at 47 Campbell Street and St John's Cemetery in O'Connell Street. The Heritage Impact Statement (HIS) attached at Appendix R, assesses the heritage context of the site and the potential impact of the proposed development on identified heritage items and views to and from these items. The HIS concludes that the proposed building envelope, as modified, will have no adverse impact on the subject heritage items.</p>
7. <i>Public domain and Public Access</i>	<p>The proposal includes public domain improvements to footpaths, the intersections of Church Street with Argyle Street and with Aird Street (east) and improvements to the Argyle Street facade. Other Improvements include paving, landscaping, seating and public art and are consistent with public domain improvements envisaged in Parramatta Council's civic improvement plan for the City Centre.</p>
8. <i>Economic Justification</i>	<p>An Economic Assessment Report relating to office space is attached at Appendix E. This assessment indicates the proposal will provide much needed A Grade office floor space, with a GFA and floor plate size that will attract major tenants to Parramatta. Sufficient floor space will be provided for more than 5,000 office jobs.</p>
9. <i>Ecologically Sustainable Development (ESD)</i>	<p>The future tower building within the proposed envelope will be designed to achieve a 5 Star Green Building rating and accord with ESD principles. Energy efficiency and ESD initiatives for the office tower will include features such as shading elements to the facades, optimal natural light penetration, chilled beams, energy efficient light fittings, monitoring of electrical consumption and water use, low water use fittings, water re-use systems, minimising car dependency, energy efficient electrical and air conditioning systems, and waste recycling.</p>
10. <i>Developer Contributions</i>	<p>A \$7.12 contribution equivalent to 3% of the project development cost is payable to Parramatta City Council prior to the issue of a Construction Certificate for the office tower. A portion of these funds can be applied to public domain improvements in the locality. The future DA will include a separate additional contribution, by way of a Voluntary Planning Agreement is proposed towards the cost of public domain improvements in Church Street.</p>
11. <i>Utilities</i>	<p>All necessary urban services are available to the site, including reticulated water and sewerage services, telephone and communication, drainage, gas and electricity. Consultation has occurred with service providers and no major upgrading or augmentation works are required. Requirements of service authorities will be addressed in Construction certificate documentation.</p>
12. <i>Pre-submission Consultation Report</i>	<p>The proponent has undertaken community consultation as part of the preparation of the Environmental Assessment for the project. A copy of the community consultation report is attached at Appendix M. Consultation has also occurred with a range of public agencies, including Parramatta City Council.</p>
13. <i>Statement of Commitments</i>	<p>A Draft Statement of Commitments is included at Section 6.13 of this Environmental Assessment Report.</p>

6.1 Relevant EPIs and Guidelines to be Addressed

The EA must address the provisions of State environmental planning policies, strategies, plans and guidelines that would apply as if those provisions applied to the carrying out of the project, including the following:

State Environmental Planning Policy (State and Regional Development) 2011;
 State Environmental Planning Policy No 55 – Remediation of Land;
 State Environmental Planning Policy (Infrastructure) 2007;
 NSW State Priorities
 A Plan for Growing Sydney
 Parramatta Local Environmental Plan 2011
 NSW Long Term Transport Master Plan;
 Sydney's Walking Future 2013;
 Sydney's Cycling Future 2013;
 Sydney's Bus Future 2013;
 Sydney's Rail Future 2012;
 Development near Rail Corridors and Busy Roads 2008;

In addition to the above, the EA also includes a consideration of the proposed modification with respect to the objects of the EPA Act 1979, the Greater Sydney Region Plan- A Metropolis of 3 Cities, the West Central District Plan, Sydney's Light Rail Future, the provisions of the Draft Parramatta City Centre Local Environmental Plan 2016 and Parramatta City Centre Development Control Plan 2011.

6.1.1 OBJECTS OF THE EPA ACT 1979

The following table provides an assessment of the proposed development against the objects of the EPA Act as detailed in clause 1.3 of EPA Act and demonstrates that the proposed modification will be consistent with the relevant objects of the EPA Act.

ENVIRONMENTAL PLANNING & ASSESSMENT ACT 1979 - OBJECTS

EPA ACT OBJECTS	COMMENTS
(a) Promote the social and economic welfare of the community and a better environment by proper management, development and conservation of the State's natural and other resources.	The proposed development, as modified, will enhance Parramatta's Central Business District, provide additional employment and retail facilities and an improved public domain. The proposal will make a positive contribution to the social and economic welfare of the community. The development is compatible with the high-density CBD environment of the locality. The proposal will not adversely impact on the State's natural and other resources.
(b) Facilitate ecologically sustainable development by integrating relevant economic, environmental and social considerations in decision-making about environmental planning and assessment	The proposed development, as modified, has been designed in accordance with ESD principles and will achieve a 5 Star Green rating for the office tower. This will assist in reducing the extent of increase in energy consumption and greenhouse gas emissions. A suitable balance is achieved between economic, environmental and social considerations.
(c). Promote the orderly and economic use and development of land.	The proposal will make a more efficient and economic use of the site, substantially increase employment opportunities and provide much needed A Grade quality office space.

(d) Promote the delivery and maintenance of affordable housing.	While this object is not applicable as the proposal is not for residential development, by providing substantial additional employment opportunities in western Sydney, which is a region that currently has an undersupply of employment opportunities. There is potential for reduced travel costs/time for western Sydney residents who will be able to access more conveniently located employment opportunities, reducing the need to seek more expensive housing closer to the Sydney CBD.
(e) Protect the environment, including the conservation of threatened and other species of native animals and plants, ecological communities and their habitats.	The site is located within a highly urbanised central city location and contains no vegetation or habitat suitable for flora and fauna. The proposal will have no adverse impact on any threatened species, populations, ecological communities or habitat. There is potential for additional tree planting within public domain improvement. A portion of the terrace on the podium roof, below the office tower will be provided with landscaping that will enhance the natural and visual amenity of the locality.
(f) Promote the sustainable management of built and cultural heritage (including Aboriginal cultural heritage)	There are no heritage items on the site or adjoining or adjacent to the proposed location of the office tower. Ample separation distance is provided to the nearest heritage items and views to and from those heritage items are adequately maintained. The modification is accompanied by a heritage Impact Statement that concludes the proposal will have satisfactory heritage impacts. The site comprises an existing multi-level shopping centre located within a large Central Business District. There are no matters of Aboriginal cultural heritage impacted by the proposed building envelope.
(g) Promote good design and amenity of the built environment	The modification proposal is for an office tower envelope only, which is of a height and scale that complements new commercial development, existing and proposed, within the Parramatta CBD, including the nearby Parramatta Square, currently under re-development. The proposed office tower will have limited and acceptable impacts on the amenity of the locality and design of the tower building will be the subject of a design excellence process to ensure good design.
(h) Promote the proper construction and maintenance of buildings, including the protection of the health and safety of their occupants.	The proposal is for a building envelope only. The future office tower will be the subject of a design excellence process and the building will be designed to optimise maintenance efficiency and the health, safety and amenity of occupants.
(i). Promote the sharing of responsibility for environmental planning between the different levels of government in the State.	Parramatta City Council has been consulted in relation to Secretary's requirements and the Part 3A modification assessment process provides for input from the Council as the local planning authority.
(j). Provide increased opportunity for public involvement and participation in environmental planning and assessment.	The proponent has undertaken a pre-lodgement consultation with relevant government agencies and with the local community, as detailed in the section of this EA Report dealing with Pre-submission Consultation Statement. The proposed modification will also be publicly notified in accordance with the requirements of the EPA Act and an opportunity for public submissions provided during the notification period. During the public notification period, plans and supporting information will be on display at Westfield Parramatta.

6.1.2 NSW STATE PRIORITIES

The Premier of NSW has established 12 Premier's Priorities designed to reflect the NSW Government's commitment to whole of government approach to tackling important issues for the people of NSW. These priorities relate to:

Creating jobs
Delivering infrastructure
Driving public sector diversity
Improving education results
Improving government
Improving service levels in hospitals
Keeping our environment clean
Making housing more affordable
Protecting our kids
Reducing domestic violence reoffending
Reducing youth homelessness
Tackling childhood obesity

Apart from the priority for creating jobs, the Premier's Priorities are not applicable to the proposed modification. The modification proposal is directly supportive of the priority for creating jobs, as the office tower envelope, as modified, can accommodate at least 3 times the number of office and related jobs, compared to the office tower envelope, as currently approved.

6.1.3 A PLAN FOR GROWING SYDNEY (2014)

The current version of the Sydney Metropolitan Strategy is "A Plan for Growing Sydney," released in 2014. This plan aims to make Sydney a strong global city and a great place to live. The Plan has 4 key goals, as follows:

- Goal 1: A competitive economy with world class services and transport.
- Goal 2: A city of housing choice, with homes that meet our needs and lifestyles.
- Goal 3: A great place to live with communities that are strong, healthy and well connected.
- Goal 4: A sustainable and resilient city that protects the natural environment and has a balanced approach to the use of land and resources.

The proposed modification is consistent with Goal 1. The planned future tower will provide a major A Grade quality 5 Green Star office tower with larger floor plates and ample floor space to accommodate major state, national and international commercial tenants, this contributing to employment growth and meeting the current shortage of prime A grade office space in the Parramatta CBD, enhancing the growth of Greater Parramatta as Sydney's second CBD, in a location that is accessible to high quality frequent public transport services.

While the proposal is not for residential development, it will meet one of the important objectives of Goal 2 by providing jobs that are close to residential development, reducing the need for residents of western Sydney to travel longer distances to work.

With respect to Goal 3, the future office tower will provide a high-quality work environment and by minimising parking provision, will optimise use of public transport, walking and cycling and provide jobs closer to the people of western Sydney.

The proposal is consistent with Goal 4 as the design of the future tower adopts sustainable development principles, achieves 5 Green energy efficiency rating, minimises resource use and has no material impact on the natural environment. The site is not subject to natural hazards.

A Plan for Growing Sydney includes 3 planning principles that are designed to facilitate achievement of the stated goals. These principles include:

Principle 1: Increasing housing choice around all centres through urban renewal in established areas.

Principle 2: Stronger economic development in strategic centres and transport gateways.

Principle 3; Connecting centres with a networked transport system.

The proposed modification is consistent with the above planning principles. The site is accessible to residential areas and is adjacent to high quality frequent public transport the site is located within a strategic centre adjacent to a transport gateway within a major CBD identified for significant jobs growth.

Each of the Plan Goals include a range of strategic directions designed to achieve the respective goals. The most relevant strategic direction is *Direction 1.2: Grow Greater Parramatta – Sydney's Second CBD*

By providing for a substantial increase in office employment in the Parramatta CBD in the order of an additional 5,000 jobs, the proposed modification will make an important contribution towards the planned increase of 100,000 jobs in greater Parramatta over the next 20 years. The proposed modification is aimed at attracting large businesses that would otherwise locate in the Sydney CBD. A key to making Parramatta Sydney's second CBD is to attract major state, national and international office tenants

Direction 1.3 aims to establish a new Priority Growth Area, extending from the Parramatta CBD, east to the Olympic Peninsula. Actions to achieve this include reviewing expansion opportunities in the Parramatta CBD, including updated building height controls. The proposed increase in floor plate size and building height is consistent with this action and facilitates provision of a building form that is attractive to major office tenants.

A Plan for Growing Sydney establishes 6 sub-regions to which District Plans apply. The subject land is located within the West Central Sub-Region, which is centred on Parramatta. A key priority for Greater Parramatta is to provide capacity for long-term employment growth in Greater Parramatta, particularly in its CBD. The proposed modification is closely aligned with this key priority.

6.1.4 GREATER SYDNEY REGION PLAN (2018)

The Greater Sydney Region Plan – A Metropolis of 3 Cities (GSRP), released by the Greater Sydney Commission in March 2018 provides a vision for the future planned development of Sydney for the next 40 years, through to 2056, when Sydney is anticipated to have a population of 8 million.

The GSRP proposes a Metropolis of 3 interconnected cities, the Eastern Harbour City, the Central River City and the Western Parkland City with Sydney's residents being within 30 minutes travel time to jobs, education, health and other services. Greater Parramatta is the metropolitan city centre for the Central River City.

The GSRP recognises 4 planning themes – Infrastructure & Collaboration, Liveability, Productivity and Sustainability and sets out 10 strategic Directions. These Directions relate to a city supported by infrastructure, a collaborative city, a city of people, housing the city, a city of great places, a well-connected city, jobs and skills for the city, a city in the landscape, an efficient city and a resilient city.

Directions relating to jobs and skills for the city and a well-connected city are of relevance to the proposed modification. Compared to the office tower envelope, as originally approved, the proposed larger office tower envelope will increase employment on the site by some 300% supporting the objectives of increased jobs in metropolitan and strategic centres and making Greater Parramatta stronger and better connected. The proximity of the site to a major rail and bus interchange in the Parramatta CBD is also supportive of the objective of increasing the percentage of dwellings within 30 minutes public transport travel time of employment.

Objective 19 of the GSRP relates to making a stronger and better connected Greater Parramatta and acknowledges Parramatta's role as a metropolitan city centre currently providing some 82,000 jobs and 700,000m² of office space. Objective 19 notes that Greater Parramatta's role as a metropolitan centre is entering a period of transformational change and identifies numerous major transport, cultural, health, educational and recreational facilities currently under construction or soon to be commenced. Objective 19 also recognises Parramatta City's emerging role as a major health and education precinct and notes that Greater Parramatta continues to attract government, civic and business employment.

The proposed modification, by facilitating development of a substantial A Grade 5 Green Star office tower accommodating approximately 3,000 jobs, with large floor plates, suitable for major private and public-sector tenants makes a positive contribution towards achieving Objective 19. Prime A Grade office floor space is currently in short supply within Parramatta, making it difficult for such prospective tenants to establish a presence in Parramatta.

6.1.5 CENTRAL CITY DISTRICT PLAN

The Central City District Plan and other District Plans support and implement the Sydney Metropolitan Strategy – A Plan for Growing Sydney and the Greater Sydney Region Plan – A Metropolis of 3 Cities, for the various subregions of Sydney. The District Plans provide more detailed planning strategies at a subregional level to guide preparation of local environmental plans and assessment of development proposals. Parramatta and the subject land fall within the boundaries of the Central City District Plan (CCDP).

Parramatta is identified as the second CBD of Sydney with status as the Central City for the Sydney Metropolitan Area and is the economic hub and gateway to Western Sydney. The Central City District Plan seeks to concentrate activities in identified centres, with the great majority of job creation planned to be in Greater Parramatta. The CCDP specifically seeks to increase the attractiveness and productivity of the Parramatta CBD.

The CCDP notes that there has been significant jobs growth of 2.2% per annum in the Central City District and that Parramatta's position as the metropolitan centre of the Central City District needs to be strengthened. The CCDP advocates that planning needs to increase capacity for new knowledge intensive jobs, including A Grade office space, which is currently at capacity.

The CCDP envisages that over the next 20 years at least 27,000 additional jobs are required in the Parramatta CBD, which is likely to result in the need for an additional 400,000m² of commercial and retail floor space. A substantial portion of this additional floor space, estimated at approximately 250,000m², is expected to be developed in Parramatta Square. The proposed modification will make a substantial contribution towards meeting the balance of new floor space requirements (150,000m²) and address the current under-supply of A Grade office space.

Increased building heights and floor space ratios proposed to be introduced pursuant to the Draft Parramatta LEP are intended to allow higher density commercial development in the CBD, with substantial increases in FSR and building height, so that sufficient floor space is available for the anticipated growth in employment. Additional A Grade commercial floor space, as proposed by the modification, within the Parramatta CBD will support existing and proposed public transport infrastructure, further consolidating the CBD's role as a commercial, service and transport hub and encourage major private and public business and service activities to move to Parramatta.

The proposed modification is consistent with the Central City District Plan and will make a significant positive contribution towards achieving the goals of this Plan, particularly with respect to employment growth and strengthening the role of Parramatta as the Metropolitan Central City.

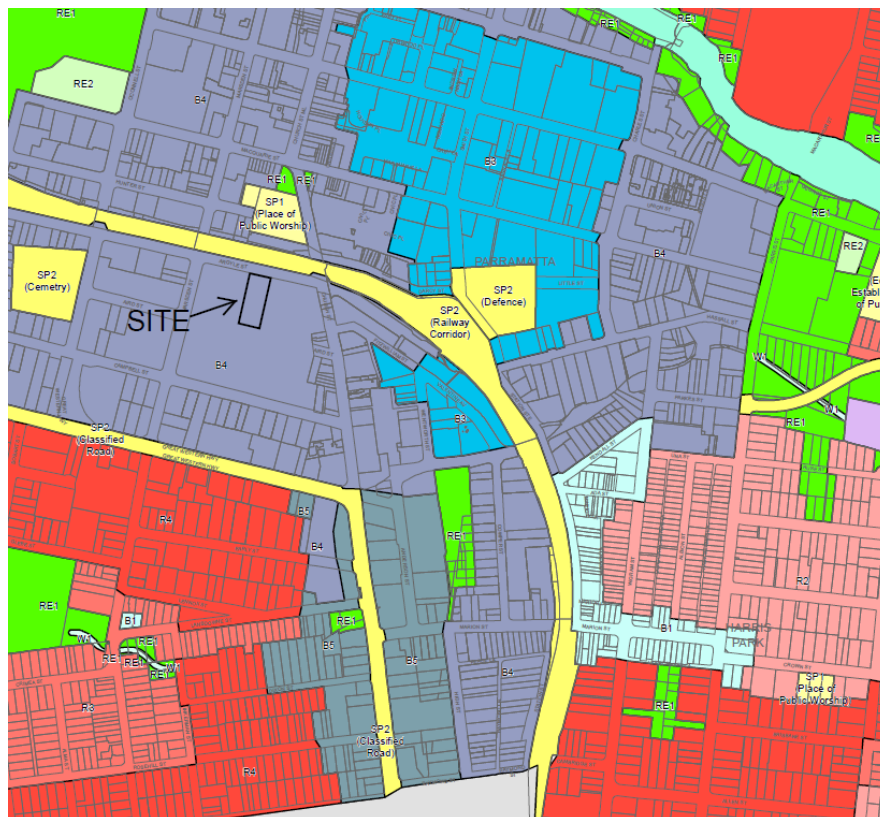
6.1.6 PARRAMATTA LOCAL ENVIRONMENTAL PLAN 2011

Parramatta Local Environmental Plan 2011 (PLEP 2011) is the applicable Local Environmental Plan applying to the subject land. With respect to the Parramatta City Centre, the LEP aims to protect and enhance the viability, identity and diversity of the Parramatta City Centre and recognise it as the pre-eminent centre in the Greater Metropolitan Region. The proposed modification, by providing substantial additional premium office space, currently in short supply in the Parramatta City Centre, is supportive of enhancing the viability, diversity and pre-eminence of the Parramatta City Centre.

Other relevant aims of the LEP include encouraging employment, fostering economic well-being in a sustainable manner, maximising use of public transport, walking and cycling, and encouraging sustainable use of energy and resources. The proposed modification is consistent with these LEP aims, as demonstrated in this Environmental Assessment Report.

The subject land is located within Zone B4 Mixed Use, a zone that applies to most land around the site, as shown in the LEP Zoning Map Extract at **Map 3**. The railway corridor on the northern side of Argyle Street is zoned SP2 Infrastructure – Rail Corridor. The site of the office tower envelope, as modified is adjoined to the east, south and west by land zoned B4 Mixed Use, also located within the boundaries of the Westfield Parramatta Shopping Centre.

Map No. 3 Parramatta LEP 2011 – Zoning Map Extract



The B4 Zone is intended to provide for a mix of compatible land uses such as business, office, residential and retail uses in accessible locations. Objectives of the B4 Zone also include maximising public transport patronage and encourage walking and cycling, create opportunities to improve the public domain and pedestrian links and support the higher order Commercial Core Zone and protect and enhance the unique qualities and character of special areas within the Parramatta City Centre.

A broad range of land uses are permitted in the B4 zone, commercial premises, hotels, shops, shop-top housing and residential flat buildings. The proposed office tower envelope falls within the definition of commercial premises, a land use that is permitted with consent.

PLEP 2011 contains a range of development controls relating to matters such as building height, floor space ratios, design excellence, car parking, building separation, signage, sun access, tree preservation and heritage. A Compliance Table outlining the nature of the relevant LEP development controls and the extent that the proposed development complies with these controls is attached at **Appendix J**.

The proposed office tower building envelope is non-compliant with some of the LEP development controls, including maximum permitted building height and floor space ratio. Although this will not be the case if the Draft Parramatta LEP proceeds to gazettal. As the City Centre car parking requirements prescribed in Part 7 the LEP are expressed as a maximum, the 100 car spaces proposed for the office tower complies with LEP requirements.

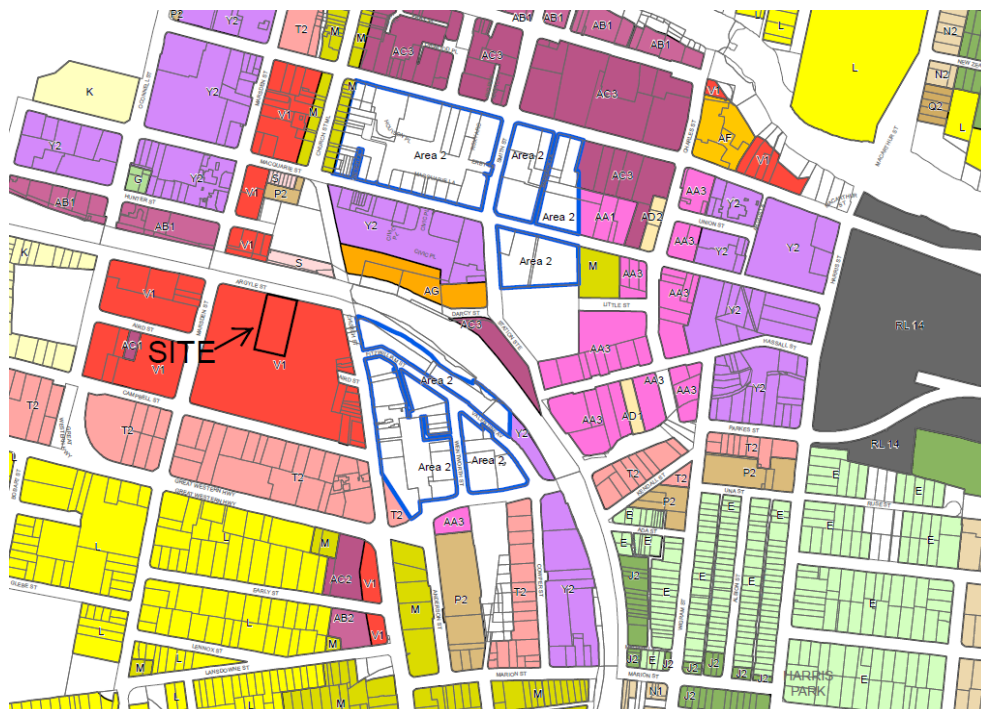
Clause 4.3 Height of Buildings

Clause 4.3 sets out controls in relation to maximum building height. The objectives of the height of buildings control are as follows;

- (a) To nominate heights that will provide a transition in built form and land use intensity within the area covered by this Plan,
- (b) To minimise visual impact, disruption of views, loss of privacy and loss of solar access to existing development,
- (c) To require the height of future buildings to have regard to heritage sites and their settings,
- (d) To ensure preservation of historic views,
- (e) To reinforce and respect the existing scale and density of low density residential areas,

Clause 4.3(2) requires that the maximum height of a building on any land is not to exceed the maximum height shown on the Height of Buildings Map. Building height is measured as the vertical distance between ground level (existing) at any point to the highest point of the building, including plant and lift overruns, but excluding communication devices, antennae, satellite dishes, masts, flagpoles, chimneys, flues and the like. An extract of the Height of Buildings Map for the locality is shown at **Map No. 4**, below. The site falls within Height Area V1, which prescribes a maximum building height of 36m for the subject land.

Map No. 4 Parramatta LEP 2011 – Height of Buildings Map Extract



The office tower is proposed to be constructed to a maximum height of 210 metres above ground level and therefore exceeds the maximum height control by some 174 metres. Council actively encourages well designed high-rise office, mixed use and residential towers in the Parramatta CBD and the skyline of the Parramatta CBD has been transformed in recent years.

The proposed building height of 210m is based on the objective of creating a landmark building near Parramatta Square, the Parramatta Railway Station and Transport Interchange and the primary pedestrian entry to Westfield Parramatta. Council aims to encourage high rise redevelopment in the Parramatta CBD, and has prepared a Draft LEP, currently awaiting Gateway determination, which provides for a substantial increase in floor space ratios and building heights in the CBD, including the subject land.

Clause 4.6 of PLEP 2011 allows for flexibility in the application of development standards such as building height and floor space ratio in order *"to achieve better outcomes for and from development by allowing flexibility in certain circumstances."* A proponent is required to demonstrate that the development standard is unreasonable or unnecessary in the circumstances of the case and there are sufficient environmental planning grounds to justify contravening the development standard. It should be noted that projects assessed under Major project approval process, including Section 75W Modification Applications are not bound by development standards in Local Environmental Plans

Notwithstanding numerical non-compliance with the development standard with respect to maximum building height, the office tower height is appropriate in this location and context and meets the objectives of the height standard in that:

- There is no reduction in sunlight access to key areas of the public domain.
- A high quality urban form will be provided by way of a design competition.
- Residential apartments in the area will retain at least 2 hours mid-winter solar access.
- Satisfactory sky exposure and day-lighting to existing buildings, public areas, parks, streets and lanes is maintained.
- The site can accommodate taller development in this location.
- The site is located adjacent to a public transport interchange surrounded by existing and proposed tall buildings. The proposed office tower will integrate into this tower building cityscape around the transport interchange and provides a suitable height transition to retail development on the balance of the site.
- Existing city skyline views are maintained and no historic views as identified in the DCP are affected.
- Existing views to the Parramatta Parklands and CBD from apartment buildings in the locality are substantially maintained.
- The additional building height will not adversely impact on any heritage items or their settings, views or visual connections.
- Council, by preparing and adopting a Draft LEP providing for substantial increases in FSR and building height has clearly indicated that the height and FSR controls in the current PLEP 2011 are no longer appropriate for the Parramatta CBD and its role as the primary centre for western Sydney

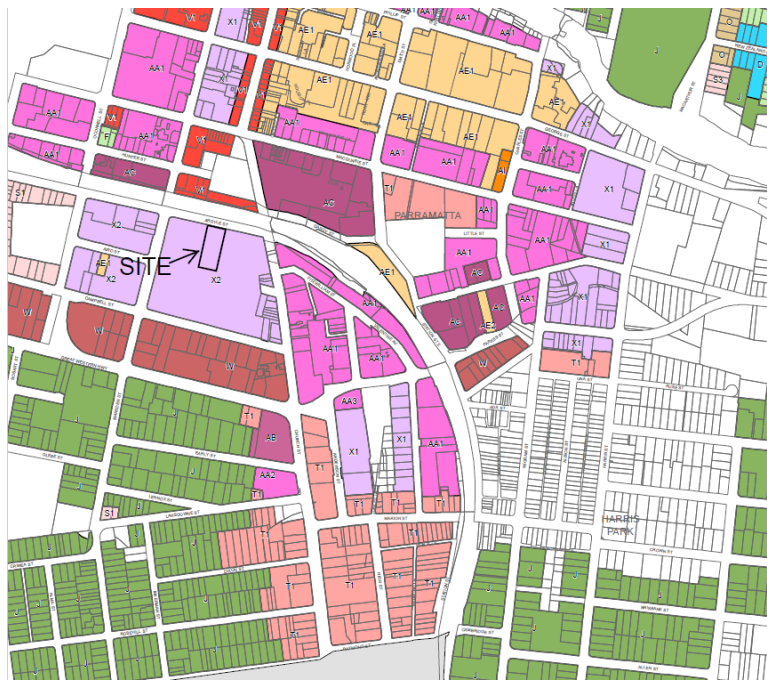
Clause 4.4 Floor Space Ratio Control

Clause 4.4 sets out controls in relation to maximum floor space. The objectives of the floor space ratio controls are as follows:

- (a) *To regulate density of development and generation of vehicular and pedestrian traffic,*
- (b) *To provide a transition in built form and land use intensity within the area covered by this Plan,*
- (c) *To require the bulk and scale of future buildings to have regard to heritage sites and their settings.*
- (d) *To reinforce and respect the existing character and scale of low density residential areas.*

Clause 22(2) requires that the maximum floor space of a building on any land is not to exceed the maximum floor space ratio (FSR) on the Floor Space Ratio Map. An extract of the Floor Space Ratio Map for the locality is shown below in **Map 5**.

Map No. 5 Parramatta LEP 2011 – Floor Space Ratio Map Extract



The site of the proposed office tower envelope subject land is located on the southern side of Argyle Street, centrally between Church Street and Marsden Street. This location and that area of the Westfield Shopping Centre located west of Church Street falls within FSR Area X2 where a maximum FSR of 4.2:1 applies. That portion of the Westfield Shopping Centre located east of Church Street falls within Area AA, where a maximum FSR of 6:1 applies.

That Part of the Westfield Shopping Centre located west of Church Street has an existing gross floor area (including car parking, but excluding development over public roads, where no FSR control applies) of 279,905m², which equates to an FSR of 4.58:1. The current concept approval for the additional retail level, additional car parking and the 35,000m² office tower increases assessable GFA to 396,036m², which equates to an FSR of 6.48:1. This is an FSR similar to the allowable FSR on land to the east. It should also be noted that a substantial portion of the FSR in the Westfield Shopping Centre, west of Church, comprises above ground car parking.

The office tower envelope as modified provides for an assessable GFA of up to 112,000m², providing for an increase of 77,000m² in assessable GFA. The resulting GFA, less a small reduction in existing retail GFA, is in the order of 473,000m², equating to an FSR of 7.74:1.

The primary purpose of the FSR development standard is to control overall bulk and scale of buildings. The focus should be on the appropriateness of built form outcome, rather than on numerical compliance with a development standard that is relatively broad brush in nature and does not sufficiently account for site specific circumstances. Further, Council has adopted a Draft LEP to allow a substantial increase in FSR in the City Centre, including potential for an FSR of up to 10:1 on the site. In these circumstances, application of the current 4.2:1 maximum FSR standard is unnecessary and unreasonable and does not provide for the most appropriate planning outcome.

As noted in consideration of the maximum building height standard, clause 4.6 of the LEP permits variations to development standards. Furthermore, Section 75W modification applications are not bound by development standards in Local Environmental Plans.

One of the objectives of the FSR standard is to ensure a degree of equity in relation to development potential for sites of different sizes and for sites located in different parts of the Parramatta CBD. Adjacent and nearby land to the east and south near the public transport interchange may be developed to an FSR of between 6:1 and 8:1. The subject land is similarly close to the interchange and due to its large size is more readily able to accommodate increased density and FSR.

Compared to commercial uses such as offices and business premises, shopping centres are required to provide a much higher proportion of car parking per area of floor space, as they must cater for shoppers, as well as staff. Westfield Parramatta has been developed with above ground parking which under current planning controls is classified as assessable GFA for calculating FSR. The proportion of floor space occupied by assessable parking GFA is therefore high in the case of Westfield Parramatta.

Car parking represents close to 50% of existing assessable GFA on the site. If this car parking, required to meet Council requirements, is excluded from the calculation of assessable FSR (i.e. FSR excluding floor space located above public roads where no FSR controls apply), as is the case in most town centres, proposed FSR is reduced from 7.74:1 down to around 5.5:1, which is commensurate with the FSR allowed for nearby land on the eastern side of Church Street.

The additional office floor space proposed in the modification will have no traffic impact, as there is no increase in the number of car spaces (100) proposed for the office tower, notwithstanding the substantial increase in floor space. About 90% of office workers in the building will access the site by public transport. The traffic assessment indicates that there will be no increase in peak hour traffic volumes, arising from the increase in office space.

Notwithstanding numerical non-compliance with the development standard with respect to maximum floor space ratio, the proposed development density is considered appropriate in this location and context and meets the objectives of the FSR standard. Proposed FSR of 7.74:1 is also some 25% less than the 10:1 maximum FSR proposed under the Draft LEP that Council has prepared.

Clause 5.10 relates to heritage conservation. The subject land is not located in a Conservation Area, does not contain any heritage items and there are no heritage items adjoining or adjacent the proposed office tower envelope. There several heritage items in the locality, as shown in **Map No. 6**, below, which is an extract from the PLEP 2011 Heritage Map.

Heritage impacts have been addressed in the Heritage Impact Statement prepared by NBRS Architecture, a copy of which is included at **Appendix R**. The heritage impact assessment concludes that the proposed office tower envelope, as modified, will have no material adverse impact on the heritage values, setting and views to and from any heritage items in the locality.

Part 7 of PLEP 2011 includes additional planning provisions applicable to land within the Parramatta City Centre, which includes the subject land. The only provisions of specific relevance to the proposed modification are clause 7.3 Car Parking, Clause 7.4 Sun Access, Clause 7.6 Airspace operations and clause 7.10 Design Excellence.

Clause 7.3 Car Parking

Clause 7.3 sets out requirements in relation to off-street parking in the Parramatta City Centre and prescribes a maximum of 1 parking space for every 100m² of floor space for commercial premises. The proposal provides 100 car spaces for an assessable commercial office GFA of 112,000m². This equates to 1 car space per 1,120m² of floor space. This is well below the maximum number of car spaces permitted (1,120 car spaces) by clause 7.3.

The objective of clause 7.3 is to minimise off-street parking and reduce reliance on private motor vehicles for access to the Parramatta City Centre. The current Concept Approval allows for an additional 562 car spaces for the Westfield Shopping Centre site. The proposed modification will result in the removal of more than 200 existing car spaces within the office tower envelope, reducing total additional car parking to less than 300 car spaces. This is a positive outcome in terms of the objectives of clause 7.3, which is designed to minimise parking provision in the City Centre.

Both the Department of Roads and Maritime Services and Transport NSW have indicated a preference for reduced parking provision based on the accessibility of the site to good quality regular and frequent public transport services. Given the excellent quality and frequency of public transport services to the Parramatta CBD, within easy walking distance of the site, it is considered that the number of car spaces proposed is sufficient.

It is necessary to provide some off-street parking to achieve A Grade office status. The provision of 100 car spaces for the office tower would be essential to attract major tenants, as such tenants generally expect on-site parking for senior and executive staff.

Clause 7.4 Sun Access

Clause 7.4 aims to protect public open space in Parramatta Square, the Lancer Barracks site and Jubilee Park from overshadowing. Sun access planes apply for each of these public spaces. The shadow impact analysis in Section 3 of the Environmental Assessment Report confirms that the provisions of clause 7.4 are complied with and there is no incursion into the sun access plane to those public spaces.

Clause 7.6 Airspace operations

Clause 7.6 requires that development consent cannot be granted to a development that is a controlled activity within the meaning of Division 4 of part 12 of the *Airports Act 1996* of the Commonwealth on land to which clause 7.6 applies unless the applicant has obtained approval for the controlled activity under the regulations made for the purposes of that Division.

Clause 7.6 applies to "Area 3" and "Area 6" on the Special Provisions Area Map. These areas are identified as sites for very tall office towers. The site of the proposed office tower envelope does not fall within either Area 3 or Area 6.

The proposed maximum height (RL) of the building (220m AHD)), does not exceed the Sydney Airport RTCC (243m AHD), but does exceed the Bankstown Airport OLS (156m AHD). Therefore, any future development application will need consider the relevant provisions of the *Airports Act 1996* and the associated regulations. It is unlikely that those provisions would preclude a future office tower of the height proposed.

Clause 7.10 Design Excellence

Clause 7.10 requires that consent not be granted to a development involving construction of a new building or external alterations to an existing building unless in the opinion of the consent authority the proposed development exhibits design excellence. The requirements of clause 7.10 in relation to design excellence are addressed in the Built Form and Urban Design section of this Report.

The proposed modification relates to a building envelope only, hence it is not possible to provide a comprehensive design analysis until architectural drawings are prepared. An architectural design competition will be held for the design of the proposed office tower. The proposed office tower envelope and location are appropriate for an accommodating major A Grade office tower that can be designed to achieve design excellence. The proposed office tower envelope, as modified, is consistent with the design excellence objectives of clause 7.10.

6.1.7 PARRAMATTA DEVELOPMENT CONTROL PLAN 2011

Parramatta Development Control Plan 2011 (PDCP 2011) is designed to provide more detailed planning provisions to support the PLEP 2011, to contribute to the growth and character of Parramatta and protect and enhance the public domain. The subject land is located within the Parramatta City Centre Strategic Precinct. The DCP controls of specific relevance to this Precinct are contained in Section 4.3.3 of the DCP. The site is not identified as being within any Special Area nominated in the DCP.

The PDCP 2011 sets out a range of development controls in relation to matters such as building form, pedestrian amenity, access and parking, environmental management, residential development and special areas. A Compliance Table summarising the nature of the relevant DCP development controls and the extent that the proposed development complies with these controls is attached at **Appendix H**.

The proposed development complies with development controls in the City Centre section of the DCP (Section 4.3.3), apart from tower front setback to Argyle Street, above the retail podium. The front wall of the podium is setback 3m from Argyle Street, behind an existing colonnade.

The following discussion addresses the proposed modification in relation to the primary development controls in the DCP, relevant to assessing a tower building envelope.

Minimum Building Street Frontage and Street Building Alignment Front Setback

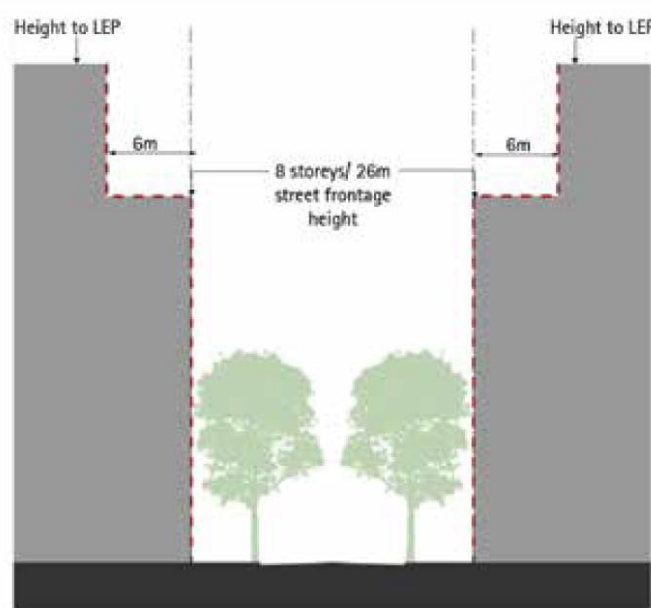
The site has a frontage to Argyle Street more than the minimum 20m required and the existing building (excluding the colonnade) has a complying 3m setback to the Argyle Street frontage. The proposed tower envelope adopts the same 3m front setback to Argyle Street. Additional front setback is required above the street frontage height as set out below.

Street Frontage Heights and Upper Level Street Front Setbacks

A street frontage height of 8 storeys/26m applies to the Argyle Street frontage of the site. Above that height a minimum 6m setback applies to the street frontage. The street frontage height controls are designed to provide for an increased front setback for taller buildings, which also provides increased tower separation, either side of the street.

Figure 10 below is a copy of Figure 4.3.3.1.9 shows the Street Frontage Height and Upper level Setback that applies to the City Centre in locations such as Argyle Street (between Marsden Street and Church) where a 26m street frontage height applies.

Figure 10 – Street Frontage Height and Upper Level Setbacks



The objectives of the street frontage height controls are:

1. *To provide street edges which reinforce, improve or support the hierarchy and character of specific city streets and lanes.*
2. *To ensure there are consistent street frontages with buildings having common alignments.*
3. *To present appropriate design responses to nearby development that complement the streetscape.*
4. *To create a clear transition between public and private space.*
5. *To assist in achieving visual privacy to apartments from the street.*
6. *To allow for street landscape character, where appropriate.*

Strict numerical compliance with **Figure 10**, above, would require a minimum 6m setback to Argyle Street for the proposed tower building envelope.

However, in this case a reduction to 3m is considered reasonable given the wind mitigating effect of the existing colonnade along the Argyle Street frontage and the fact that the existing rail corridor/embankment opposite the site, on the northern side of Argyle Street precludes construction of any tower buildings on the northern side of this street. Accordingly, a substantial building separation is provided to the north and a canyon like effect would not be created along Argyle Street.

The proposal achieves the objectives of the street frontage height/setback control and provides for a suitably framed street, ample tower separation either side of the street, appropriate transition between public and private space and no adverse privacy or shadow impacts.

As the proposal is for a building envelope only, rather than an actual design for a tower, a 3m envelope setback to Argyle Street is reasonable and allows for a potential articulation zone to Argyle Street, with setbacks, at least in part, greater than 3m, should this be deemed desirable through the design excellence process, as part of the future design of the tower.

Building Depth and Bulk

The building depth and bulk controls in the DCP are designed to allow for good internal working environments, minimise need for artificial heating, cooling and lighting, provide viable and useable commercial floor space, view sharing and view corridors and achieve positive urban design outcomes such as useable and pleasant streets and public domain at ground level, an appropriate city skyline and reduce apparent bulk and scale by breaking up expanses of building wall and modulation of form.

The DCP controls prescribe a maximum horizontal dimension of any building above street frontage height of 45m, with all points of an office floor within 12m from a source of daylight amenity, access to natural light and ventilation and mitigation of potential adverse effects that tall and bulky buildings may have on the public domain. The DCP notes that contemporary commercial buildings require larger floor plates than residential buildings and accordingly, a maximum floor plate size is not prescribed for commercial buildings.

The proposed office tower envelope has a complying maximum horizontal dimension to Argyle Street of less than 45 metres and the future tower floor plate can be designed so that the great majority of office floor space is within 12m of sources of daylight. Glazing details and access to natural light would be addressed in detailed design of the office tower. The proposed building envelope is more than 20% larger than the final building form, to provide for building articulation in the final design.

The proposed building envelope offers ample space for building articulation for any future office tower, to avoid large expanses of building wall.

Building Separation

Where buildings extend above a height of 54m side and rear tower setbacks apply to achieve appropriate building separation to provide adequate daylight, outlook, view sharing, ventilation, wind mitigation, privacy and ensure useable pleasant streets and public spaces in terms of wind mitigation, daylight and solar access.

A minimum side setback of 6m and a minimum rear setback of 12m apply for towers over a height of 54m. the proposal readily complies with these setback standards, providing side and rear setback of more than 24m.

Building Form and Wind Mitigation

Tall buildings have potential to create adverse wind impacts. A preliminary wind impact assessment has been prepared indicating that the proposed 3m front setback to Argyle Street, in combination with retention of the existing colonnade fronting the retail podium, will ensure complying wind conditions at street level. Measure are recommended in the wind impact assessment, such as awnings and architectural features near the base of the tower, above the existing podium, to mitigate any major wind impacts on the podium roof terrace area.

A detailed wind impact assessment, including results of a wind tunnel test will be included with the DA for the future office tower to be designed and constructed within the proposed building envelope.

Sun Access to Public Spaces

The DCP mandates sun access planes to protect sunlight access between 12 noon and 2pm to nominated public spaces such as Lancer Barracks and Jubilee Park. The building envelope, as currently approved, is located within the sun access plane of Jubilee Park. However, the height of the currently approved envelope does not encroach into the height limits prescribed in the sun access diagram. **Figure 11**, below is the sun access diagram that applies for Jubilee Park (Figure 4.3.3.1.16 in the DCP)



Figure 11
Sun Access Plane Diagram
Jubilee Park

The building envelope, as proposed to be modified, is located to the west of the sun access plane to Jubilee Park and therefore, does not create any shadowing of Jubilee Park between 12 noon and 2pm. This is also confirmed in the shadow diagrams provided for the proposed building envelope.

Public Domain and Pedestrian Amenity

The DCP encourages improved pedestrian access and safety and identifies existing and proposed pedestrian links within the CBD. A pedestrian link extending south through the development site from Argyle Street, between Church Street and Marsden, is identified on the DCP Public Domain Plan and Existing and Desired Links Plan. The proposed ground floor lobby and mall entry, below the proposed tower envelope, is in accordance with the DCP Public Domain Plan and Existing and Desired Links Plan.

The DCP does not require an awning to be provided along the southern side of Argyle Street. The existing colonnade to Argyle Street will be retained and provides weather protection for pedestrian and those persons waiting for buses in Argyle Street.

Active Frontages

The DCP requires active frontages throughout the city centre and specifies a minimum of 50% active frontage of buildings to primary street frontages and 40% for secondary street frontages and lanes. While Church Street is the primary street frontage for the Westfield Shopping Centre, there is recognition that increased activation should be provided to the Argyle Street frontage of the site.

The concept plans for the proposed building envelope provide for a ground floor entry and lobby to the future office tower, off Argyle Street. New retail and café tenancies are also proposed adjacent to the ground floor entry and lobby and include active frontages to Argyle Street, exceeding 50% of the elevation width, below the office tower envelope.

Views and View Corridors

PDCP 2011 notes that *“it is important that views within the city and into and out of the city are maintained from as many points as possible.”* The DCP places emphasis on views *“when they terminate at places of architectural, landscape or cultural significance.”* Examples include major parks, publicly significant objects or heritage items.

In assessing visual impact, the DCP observes that the *“silhouettes of many buildings are significant and contribute to the identity of the commercial core of the city and its skyline.”* The DCP recommends that *“the massing and arrangement of the skyline and existing building silhouettes should be carefully considered, and proposed development should be carefully designed so that its appearance complements the city skyline.”*

PDCP 2011 sets out 3 objectives in relation to views and view corridors, as follows;

- *To maintain and enhance views from the city centre to significant heritage or natural features.*
- *To protect views along city streets.*
- *To protect the silhouettes of the tops of major buildings or structures as seen against the sky.*

DCP Figure 4.3.3.4.1 identifies 9 historic view that need to be considered in terms of assessing view and visual impact. These views include views from Old Government House, northeast to the river, views south along Church Street to St Johns Church/Square and views northeast from Mays Hill.

Figure 12, below is a copy of DCP Figure 4.3.3.4.1 showing the 9 historic view corridors.

Figure 12 - Extract from PDCP 2011



The DCP requires that views shown in Figure 4.3.3.4 of the DCP be protected in the planning and design of development. The controls require that buildings be aligned to maximise and frame view corridors between buildings; keep under storey planting low where possible and that design should take in to account existing topography, vegetation and surrounding development.

he proposed office tower envelope does not encroach into any of these view corridors. However, it is located in the backdrop to View 3 which extends south from Church Street to St Johns Church, as shown in **Figure 11**, above. There are 3 narrow view corridors (2, 3 and 4) which extend towards St Johns Church along Hunter Street (2), Church Street (3) and from the east (4). All these view corridors terminate at the Church and do not extend beyond the Church. None of the view corridors extend beyond the Church.

While any material encroachment into the 3 view corridors to and from St Johns Church would be inappropriate, there is no implied prohibition on structures that area outside the limits of those view corridors and which would effectively form a backdrop beyond the termination point of the view corridor. The proposed office tower envelope is located to the south of the termination of View Corridor 3, presenting as a backdrop element only in this view. On this basis there is a limited and acceptable visual impact in View Corridor 3

The 9 nominated view corridors in the DCP have been considered in the Visual Impact Assessment (attached at **Appendix L** and in the Statement of Heritage Impact (attached at **Appendix R**). Both these assessments conclude that the proposed building envelope will have an acceptable impact on the nominated view corridors.

6.1.8 PARRAMATTA DRAFT CITY CENTRE LOCAL ENVIRONMENTAL PLAN 2016

In 2015/16 Parramatta City Council prepared Draft City Centre LEP 2016 (DLEPCC 2016) in response to the Parramatta CBD Planning Strategy adopted by Council in April 2015. The Strategy identified a need to provide for an expanded CBD and more intensive commercial core supported by higher density mixed use and residential development. DLEPCC 2016 aims to encourage high yield employment use and high performing buildings to meet the jobs target of 27,000 jobs over the next 20 years.

The DLEPCC 2016 has not yet been exhibited or issued with a Gateway and therefore, has limited weight in relation to the assessment of development proposals. Parramatta Council has specifically requested the provisions of this Draft LEP be considered in the assessment of the modified tower envelope.

The Draft LEP proposes to extend the boundaries of the B3 City Core Zone to include the Westfield Shopping Centre, which includes the site of the proposed office tower envelope, as modified. The B3 Zone focuses on employment land uses, being primarily commercial and retail in nature. The proposed modification is consistent with the B3 City Core Zone proposed in the Draft LEP.

DLEPCC 2016 will allow a substantial increase in FSR in the B3 City Core Zone, including the subject land, where FSR will increase from 4.2:1 to 10:1. The office envelope, as modified will result in an FSR of 7.74:1 (included the approved additional retail level), which is some 25% less than the maximum FSR envisaged in the Draft LEP.

Maximum building height controls will not apply for most of the B3 Commercial Core Zone in the Draft LEP, apart from areas where a sun access plan applies, or where a specific height control has been nominated for a site on the LEP Building Height Map. Where building heights are nominated on this Map, building heights ranging up to 200m apply. The 200m maximum building height control applies to the southwest portion of the Parramatta Square development area, located a short distance to the northeast of the subject land.

The site of the proposed office tower envelope, as modified is not located within an area where a sun access plane applies or where a maximum building height is nominated on the Building Height Map. Upon gazettal of the Draft LEP the existing 36m height limit applying to the site of the proposed modified office tower will be removed and no height limit will apply.

The proposed office tower, as modified, aligns with the objectives of DLEPCC 2016 to provide for increased density and building height in the commercial core of the CBD and complies with the zoning and primary development controls proposed for the site in the Draft LEP.

6.1.9 STATE AND REGIONAL ENVIRONMENTAL POLICIES

6.1.9.1 State Environmental Planning Policy No. 55 – Remediation of Land (SEPP 55)

State Environmental Planning Policy No. 55 – Remediation of Land (SEPP 55) makes remediation permissible across the State, defines when consent is required, requires all remediation to comply with standards and seeks to ensure that land is investigated if contamination is suspected. The Policy states that land must not be developed if it is unsuitable for a proposed use because it is contaminated. If the land is unsuitable, then remediation must take place before the land is developed.

The proposed modified office tower envelope does not include any “contamination” sensitive land uses such as residential, a child care centre or the like. The site has not been used for industrial purposes. Excavation is minor in extent, with some limited excavation required for structural strengthening and foundations for supporting columns. The project includes demolition work.

Douglas Partners have completed a Phase 1 Contamination Assessment for the original application for Concept Plan approval. A copy of this Assessment is attached at **Appendix V**. Douglas Partners’ assessment indicates that the potential for contamination at the site is low and any potential contamination of soils is likely to be localised, for example, directly underneath oil-water separators or contaminated filling around underground services.

Douglas Partners advise that whilst potential for contamination is low and indicate that *“the possibility that contaminated soil materials will be encountered during excavations for the proposed upgrade cannot be completely ruled out (even if limited intrusive soil testing is undertaken).”* Douglas Partners recommend *“that if signs of contamination (such as stained soils, fibre cement fragments or unusual odours) are encountered during excavations, an environmental consultant be engaged to make an assessment of the soil and provide recommendations (where required) for the remediation of any identified contamination.”*

Any potentially contaminated material is likely to have a low level of contamination and can be managed in accordance with the guidelines and controls for managing contaminated material from excavation.

A suitably worded consent condition can be imposed requiring that any contaminated material encountered on site arising from demolition works, excavation or structural strengthening, be managed in accordance with the Contaminated Land Management Act 1997 and the contaminated land planning guidelines.

6.1.9.2 State Environmental Planning Policy (Infrastructure) 2007

State Environmental Planning Policy (Infrastructure) 2007 (SEPP Infrastructure) aims to facilitate the effective delivery across the State by providing a regulatory framework for the planning and assessment of infrastructure projects nominated in the SEPP, such as road and rail infrastructure, electricity transmission lines, gas pipelines, sewerage systems and waste management facilities. Provisions are also included relating to development adjacent to rail corridors and traffic generating development.

Subdivision 2 of the SEPP applies to development in or adjacent to road corridors and road reservations. Subdivision 2 includes provisions relating to development with frontage to a classified road, impact of road noise and vibration and provisions relating to the referral of certain traffic generating developments to the Department of Roads and Maritime Services (RMS).

Clause 101 of the SEPP relates to development with frontage to a classified road. The subject land has frontage to a classified road, being O'Connell Street. The proposed modification does not result in any change to existing vehicular access to the site. The proposed office tower will be serviced from the nearby loading docks on the eastern side of Marsden Street rather than the Aird Street east loading dock. This will reduce truck traffic in Church Street, compared to the building envelope location as currently approved, with some increase in truck traffic in Marsden Street, a street which has the capacity to readily accommodate additional truck traffic.

Due to the necessary removal of retail floor space within the existing retail podium, below the proposed office tower envelope, as modified, there will be a small reduction overall in retail floor space, notwithstanding the potential for some additional retail floor space on the roof terrace. In addition, parking for the office tower envelope remains unchanged at 100 car spaces, notwithstanding the substantial increase of office floor space. Accordingly, there will be minimal change to traffic generation due to the proposed modification, compared to the office tower envelope, as originally approved.

Clause 102 of the SEPP requires a consideration of the impacts of traffic noise and vibration on residential and other nominated noise/vibration sensitive development adjacent to a road with an annual average daily traffic volume of more than 40,000 vehicles. The proposed development is for commercial purposes, a land use that is not listed in clause 102 as being noise or vibration sensitive land uses. Accordingly, the provisions of clause 102 do not apply to the proposed development.

Clause 104 of the SEPP requires that major traffic generating development on a site fronting to, or on a road that connects to a classified road (within 90 metres of the site) be referred by the consent authority to Roads and Maritime Services (RMS) for consideration.

The RMS was consulted with respect to the original Concept Plan and recommend minimising additional parking, introduction of measures to manage demand for car use and promote travel choices other than private car travel.

The RMS required some improvements to the road network near the site, arising from the Project Approval for the retail/parking additions, which were required to be completed prior to construction works for those components commencing on the site. Several of the required road improvements are currently under construction. The office tower envelope, as modified, will not generate any more traffic than the office tower envelope, as currently approved.

In the response to SEAR's, the RMS, by letter dated 19/9/17 requested that the Transport Accessibility component of the EA Report address a range of matters such vehicle trips, adequacy of public transport, arrangements for walking and cycling, access arrangements, car and bicycle parking, end of trip facilities and service vehicle arrangement be addressed. These matters are addressed in the Traffic Report attached at **Appendix K** and summarised in Section 6.5 of the EA Report.

A total of 100 car spaces will be provided in a location accessible to the proposed office tower. This is the same number of car spaces provided for the smaller office tower envelope, as currently approved. The extent of retail parking will be reduced, because of the removal of parts of 2 parking decks, to facilitate construction of the office tower, above the Department store.

Division 15 - Subdivision 2 of the SEPP relates to development in rail corridors. The subject land is adjacent to the main Western Railway Line, located on the northern side of Argyle Street. The proposal does not include residential, public worship, hospital, educational or child care land uses and therefore is not required to consider rail noise or vibration impacts.

The office tower envelope will require construction of supporting columns down to ground level and associated foundation works for those columns installed below ground level. Such works will be more than 20 metres from the rail corridor and will not impact on the operation of the existing rail lines or their structural integrity and safety, nor will the proposal impact on any likely expansion project for the rail corridor. The future DA for the office tower will, nevertheless, require referral by the consent authority, to Sydney Trains for consideration and concurrence. The proposal is consistent with the relevant objectives and provisions of SEPP Infrastructure 2007.

6.1.9.3 State Environmental Planning Policy (State and Regional Development) 2011

State Environmental Planning Policy (State and Regional Development) 2001 (SEPPSRG 2011) aims to identify development that is State significant development or critical State significant infrastructure and confer functions on joint regional planning panels to determine DA's. Schedules 1 to 5 of the SEPP identify the various forms of development and sites that are prescribed as State significant development, sites or infrastructure. The subject land and the proposed development do not fall within Schedules 1 to 5 of the SEPP.

The original Concept Approval was approved in February 2014 as a Major Development (commercial and/or retail development), pursuant to the now repealed Part 3A of the *EPA Act*. Schedule 6 of the SEPP includes a list of amendments of other instruments. Clause 6.12 relates to State Environmental Planning Policy (Major Development) 2005 (SEPPMD 2005) and lists a range of amendments to this SEPP.

Subclause 6.12(22) of SEPPSRG 2011 relates to the Clause 17 Transitional provisions in SEPPMD 2005 relating to major residential, commercial and retail developments and states that SEPPMD 2005 continues to apply to transitional projects under Part 3A relating to residential, commercial and retail developments under the Major project provisions. These Transitional provisions allow the modification application to be assessed and determined under Part 75W of the *EPA Act*. The Planning Assessment Commission of NSW remains as the consent authority for the proposed modification of MP10_0068.

6.1.10 PLANNING POLICIES AND GUIDELINES

6.1.10.1 NSW Long Term Transport Master Plan

The NSW Long Term Transport Master Plan for NSW was prepared in 2012 and sets out a 20-year framework for the NSW Government to deliver an integrated, modern transport system that puts the customer first. The Master Plan identifies the challenges to the NSW transport system and is designed to guide decision-makers to prioritise actions which address the most pressing challenges. The Master Plan also identifies a planned and coordinated set of actions to address the challenges and includes a map of future services and infrastructure developments.

The Master Plan addresses transport infrastructure, primarily focussing on roads, freight, bus, rail, light rail and cycling. The master Plan advocates integrating transport and land use planning to optimise travel efficiency and convenience and minimise travel times and congestion. Some of the projects that relate to Parramatta include increased train frequency between Parramatta and the CBD, completion of WestConnex, completion of widening of the M4, additional express bus routes and bus priority routes (including strategic bus routes to connect Parramatta to other major centres within 30 minutes of Parramatta), increased train capacity on the western line, Westmead-Parramatta-Carlingford light rail, Parramatta Valley Cycleway.

The proposed office tower, by providing a significant increase in employment in a major CBD, close to the Parramatta bus and rail Transport Interchange and the planned Parramatta light rail stop at Parramatta Square, in combination with significantly limiting the amount of off-street parking for the proposed tower, is an excellent example of a development that is consistent with the principle of integrated transport and land use planning and the NSW Long Term Transport Master Plan.

The NSW Long Term Transport Master Plan is supported by more detailed transport planning documents such as Sydney's Rail Future, Sydney's Bus Future, Sydney's Walking Future, Sydney's Cycling Future and Sydney's Light Rail Future. The proposed modification is assessed against these transport planning documents in Sections 6.1.8.5 to 6.1.8.9 of the EA Report.

6.1.10.2 Guide to Traffic Generating Developments (RMS)

The RMS Guide to Traffic Generating Developments (RMS Guide) sets out guidelines for development applications relating to traffic generation, traffic impacts, car parking and design of access and parking areas. The proposed office tower envelope is assessed against the relevant provisions of the RMS Guide in the Traffic and Transport Assessment, attached at **Appendix K**. This Assessment concludes that the proposed modification meets the relevant provisions, goals and objectives of the RMS Guide.

The Traffic and Transport Assessment indicates that due to the reduction in retail floor space and the proposal to limit office car spaces to 100, being the same as for the smaller currently approved office tower envelope, the proposal will generate less traffic than the currently approved office tower development. The Assessment also notes that bicycle, accessible, motor cycle and car share parking will be provided in accordance with the requirements of Parramatta DCP 2011 and there will be no change in the approved access arrangements.

The RMS Guide recommends the provision of 1 car space per 40m² of GFA (which equates to 2,800 car spaces), defers to the Council Parking Code in "restrained situations".

Council's Parking Code, with respect to the Parramatta CBD, sets a maximum, rather than a minimum number of car spaces to discourage use of private motor vehicles for trips to the Parramatta CBD. Accordingly, the proposed 100 car spaces for the office tower complies with Council's parking requirements and is appropriate to a CBD location, where travel by public transport should be optimised.

6.1.10.3 EIS Guideline – Road and Road Related Facilities

The EIS Guideline – Road and Road Related Facilities (EIS Guideline) was prepared in 1996 by the then NSW Department of Urban Affairs and Planning and identifies issues which may need to be addressed in an Environmental Impact Statement (EIS) for a road or road related facility. The EIS Guideline notes that road proposals have the potential to result in significant effects on the social and economic aspects of the community as well as the biophysical environment.

The proposed office tower envelope is not a road or road related facility and an EIS is not required for the proposed modification. Accordingly, the EIS Guideline has little if any relevance to the office tower envelope, as modified. The Traffic and Transport Assessment attached at **Appendix K** concludes that the proposed modification meets the relevant provisions, goals and objectives of the EIS Guideline.

The proposal, as modified, provides no additional car parking, compared to the office tower envelope, as originally approved and will not generate any additional traffic to the site compared to the office tower envelope. Several intersection improvements in the locality were identified for the Project Approval for the planned additional retail level and work has commenced on at least 2 of these intersection improvements. They are not related to the proposed office tower envelope and there are no changes to approved vehicular access or loading/unloading arrangements.

6.1.10.4 Guide to Traffic Management – Part 12 Traffic Impacts of Development (AUSROADS)

The Guide to Traffic Management – part 12 Traffic Impacts of Development (AUSROADS) (the Guide – Part 12) is concerned with identifying and managing the impacts on the road system arising from land use developments. It provides guidance for planners and engineers associated with the design, development and management of a variety of land use developments. Part 12 of the Guide presents the land use and transport planning context for traffic impact assessment, including travel demand, safety, parking and access management issues.

The proposed modification has been assessed against the provisions of the Guide – part 12 in the Traffic and Transport Assessment attached at **Appendix K**. This assessment confirms that there will be no increase in traffic generation, compared to the office tower envelope, as approved and the proposed modification meets the relevant provisions, goals and objectives of the Guide – Part 12.

6.1.10.5 Sydney's Walking Future 2013

Sydney's Walking Future was released by the NSW Government in 2013 with the objective of promoting walking for transport and connecting people and places through safe walking networks around centres and public transport interchanges.

The proposed modification is consistent with Sydney's Walking Future 2013, for the reasons set out below.

- On-site parking is minimised, to encourage use of public transport, cycling and walking.
- The site is within easy and safe walking distance of the Parramatta Railway Station and Transport Interchange and Parramatta Square.
- Many medium and high rise residential buildings are located within walking distance of the site, providing potential for office workers to live nearby within walking distance of the proposed office tower.
- Wide footpaths, mostly with weather protection, included grade separated road crossings of Church Street and Marsden Street for use by pedestrians are available, as well as convenient pedestrian routes to the site via Church Street, Argyle Street and Marsden Street.
- Direct pedestrian access is provided from the ground level office tower lobby to Argyle Street and through the existing shopping mall to the Church Street shopping centre entry.
- Improvements are proposed to the existing footpath paving in Argyle Street and an enhanced and safer pedestrian environment achieved by providing additional landscaping and street furniture and an active street frontage, including cafes and outdoor dining at ground level to Argyle Street.
- Improvements are proposed to the pedestrian environment under the Church Street railway bridge and raised paving to slow vehicles and provide safer crossing for pedestrians, at the intersection of Argyle Street and Church Street, to provide a more convenient and safer ground level pedestrian access to Parramatta Square and the Parramatta Railway Station and Transport Interchange.
- End of trip facilities, such as showers, toilets and lockers for those who cycle, jog or walk to the site.

6.1.10.6 Sydney's Cycling Future 2013

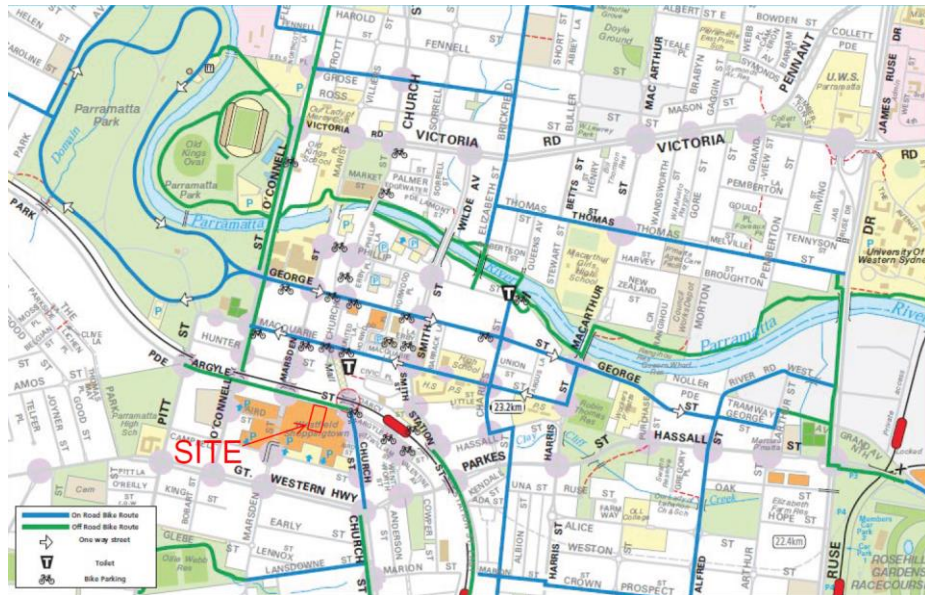
Sydney's Cycling Future (SCF 2013) was released by the NSW Government in 2013 and aims to provide a safe and connected network of bicycle paths. SCF 2013 notes that more people are choosing to ride a bike for transport and seeks to make bicycle riding a feasible transport option primarily by investing in separated cycleways and providing connected bicycle networks to major centres and transport interchanges and promoting better use of our existing network.

In relation to Parramatta, SCF 2013 is focussed on connecting the Parramatta CBD and transport interchange with off-road cycleways connecting key nearby activity centres such as Sydney Olympic Park, Westmead Medical Precinct, University of Western Sydney, Merrylands and the existing Parramatta River foreshore cycleway. The Parramatta CBD is recognised as key destination for cyclists.

The subject site is strategically located near the Parramatta CBD Transport Interchange, which is a primary focal point for the CBD cycle network. Argyle Street forms the western connection to this Interchange, Church Street (south of the railway bridge) the southern connection to the Interchange and nearby Station Street and Macquarie Street provide the eastern connections and O'Connell Street, the northern connection.

Map 7 below shows the highly accessible location of the site, with respect to the Parramatta CBD's Transport Interchange and cycling network.

Map 7 – Parramatta CBD Cycling Routes



The proposed modification is consistent with Sydney's Cycling Future 2013, for the reasons set out below.

- On-site parking is minimised, to encourage use of public transport, cycling and walking.
- The site is within easy and safe cycling distance of the Parramatta Railway Station and Transport Interchange.
- Many medium and high rise residential buildings are located within easy cycling distance of the site, providing potential for office workers to live nearby within cycling distance of the proposed office tower.
- The site fronts a primary cycle route (Argyle Street) with convenient cycling access to the site off nearby Marsden Street.
- Future access for cyclists is proposed off Marsden Street (east side) to more than 500 proposed bicycle parking spaces and end of trip facilities such as showers, toilets and lockers to be located near the ground floor tower lobby. Details of these bicycle parking spaces and end of trip facilities will be included in the future DA plans.

6.1.10.7 Sydney's Bus Future 2013

Sydney's Bus Future (SBF 2013) was released by the NSW Government in 2013 and aims to deliver a modern and customer focussed integrated bus system providing simpler, faster and better bus services, with the objective of attracting more customers to use bus services throughout Sydney.

Parramatta and the Parramatta CBD are identified as primary hub/destination for bus connections to Western Sydney, with a network of high-frequency rapid bus services in place or planned to be established to a wide range of destinations, including Ryde, Epping/Macquarie park, Olympic Park/Burwood, Bankstown/Hurstville, Fairfield/Prairiewood/Liverpool, Blacktown/Mt Druitt, Rouse Hill/Norwest and Castle Hill/Baulkham Hills.

The envisaged bus network is illustrated in **Map 8**, below.

Map 8 – Rapid & Suburban Bus Routes Supporting the Parramatta CBD



The subject site is strategically located within easy walking distance of the nearby Parramatta CBD Transport Interchange, which is a primary rail and bus interchange for the Parramatta CBD. The proposed modification is consistent with Sydney's Bus Future 2013, for the reasons set out below.

- On-site parking is minimised, to encourage use of public transport (including buses), cycling and walking.
- The site is within easy and safe walking distance of the Parramatta Rail and Bus Transport Interchange and fronts existing bus stops in Argyle Street.
- A large resident population is located within a half hour bus trip to the site.
- Proposed enhancements to the public domain and increased activation to Argyle Street will enhance the amenity and safety of the existing bus stops in Argyle Street.

6.1.10.8 Sydney's Rail Future 2012

Sydney's Rail Future (SRF 2012) was released by the NSW Government in 2012 and is a long-term plan designed to modernise and increase the capacity of Sydney's rail network through investment in new services, upgrading of existing infrastructure and improve reliability and increase services across the network.

Proposals of specific relevance to Parramatta include a major increase in capacity along the Western Line and improved and increased express services from the Sydney CBD to Parramatta. Parramatta Railway Station is an important destination in the Sydney rail network and includes a major transport interchange allowing bus passengers from suburbs around Parramatta to interchange with rail services.

The subject site is strategically located within easy walking distance of the nearby Parramatta Railway Station, providing convenient commuter access from suburbs located beyond the immediate catchment of the Parramatta CBD. Express train services to the Sydney CBD provide a high level of connectivity to the Sydney CBD for meetings and other forms of interaction with national and global business located in the Sydney CBD.

The proposed modification is consistent with Sydney's Rail Future 2013, by providing for a significant increase in employment, close to a major railway station, which in combination with minimisation of on-site car parking, will encourage train travel to the Parramatta CBD.

6.1.10.9 Sydney's Light Rail Future 2013

Sydney's Light Rail Future (SLRF 2013) was released by the NSW Government in 2013 and is a long-term plan designed to expand Sydney's light rail network and integrate the light rail network with bus and train services. In Western Sydney opportunities have been identified for providing high frequency light rail services along Parramatta Road and between the Parramatta CBD and destinations such as Westmead, Camellia, Olympic Park and Carlingford.

The NSW Government is working with Parramatta City Council to complete the Western Sydney Light Rail Feasibility Study. In May 2018, the NSW Government announced that construction of Stage 1 of the Western Sydney Light Rail would proceed. This light rail service will extend from Westmead Railway Station, through the Westmead Medical Precinct and North Parramatta, to the Parramatta CBD and then to Camellia and Carlingford. Stage 2 will extend the light rail line to Rydalmere, Ermington, Wentworth Point and Sydney Olympic Park.

Within the Parramatta CBD, light rail stops are planned for Church Street, near George Street and for Parramatta Square in Macquarie Street. The Parramatta Square stop will be located within convenient walking distance (less than 400m) from the proposed office tower in Argyle Street.

The proposed modification is consistent with Sydney's Light Rail Future 2013, by providing for a significant increase in employment, close to the proposed Parramatta Square light rail stop, which in combination with minimisation of on-site car parking, will encourage travel to the Parramatta CBD by light rail.

6.1.10.10 NSW Planning Guidelines for Walking and Cycling

NSW's *Planning Guidelines for Walking and Cycling* (2004) aim to encourage improved consideration of measures to enhance walking and cycling in the preparation of planning instruments and the design of development. In relation to the design of development, the Guidelines recommend that building and site design:

- Identify and respond to walking and cycling routes identified in planning instruments, bike plans and pedestrian plans.
- Encourage active uses on ground floors of buildings in centres and along key walking routes.
- Ensure shopfronts and windows of buildings overlook the street on all street frontages.
- Pedestrian entries to buildings to be directly off the street and visually dominant over motor vehicles.
- Build office, commercial and mixed-use buildings close to the lot line to provide a continuous edge to the street and provide weather protection to footpaths.

- Driveways crossing footpaths to be designed so that vehicles cross at low speed and motorists have a clear view of pedestrians.
- Driveways out of basement car parks designed to include a level motor vehicle stopping platform and splayed building corners to improve visibility.
- Delineate and mark key walking routes through car parks and give pedestrian priority along those routes.

The proposed office tower will be provided with more than 500 bicycle parking spaces and end of trip facilities, accessed off Marsden Street, as outlined in consideration of Sydney's Cycling Future 2013. These additional cycling facilities will encourage workers to access the site by bicycle. The proposed office tower lobby in Argyle Street is well-served for pedestrian access along Argyle Street and from Church Street, to the nearby Parramatta Transport Interchange and Parramatta Square.

Pedestrian and cycling facilities will be designed in detail, as part of the preparation of the development application for the office tower and will accord with the design principles outlined in the *Planning Guidelines for Walking and Cycling* and Traffic Management and Accessibility Plan will be included with the future development application.

6.1.10.11 Development Near Rail Corridors and Busy Roads – Interim Guideline

The Interim Guideline – Development Near Rail Corridors is a supporting guideline to SEPP Infrastructure 2007. The aim of the Interim Guideline is to assist in reducing the health impacts of rail and road noise and adverse air quality on sensitive adjacent development. The Interim Guideline also addresses the potential impact of development near rail corridors and busy roads that may impact on the structural integrity of transport infrastructure.

The proposed office tower is located adjacent to the main Western Railway Line on the northern side of Argyle Street and has frontage or is close to busy roads such as O'Connell Street and the Great Western Highway. The proposed modification is however, not for a noise/vibration sensitive land use, such as residential, school, child care centre, hospital and the like. Notwithstanding this situation, the issue of noise/vibration impacts has been considered in the Acoustic and Vibration Impact Assessment prepared by VIPAC and attached at **Appendix Q**.

VIPAC's assessment concludes that rail vibration impacts on the site are minimal and well below preferred maximum vibration levels and will not impact the amenity of workers and shoppers. In relation to road and rail traffic noise, the acoustic assessment concluded that noise levels within the shopping centre will not exceed the recommended guidelines for commercial sites and will not adversely impact on the acoustic amenity of workers and shoppers.

Construction of the future tower will include structural strengthening works and foundations for supporting columns below ground level at depths of more than 2 metres, some of which are located within 25 metres of the southern side of the rail corridor on the northern side of Argyle Street. Such works will be at least 20 metres from the rail corridor and will not impact on the operation of the existing rail lines or their structural integrity and safety, nor will the proposal impact on any likely expansion project for the rail corridor. The DA for the proposed office tower will require referral by the consent authority, to Sydney trains for consideration and concurrence.

Requirements of Sydney Trains can be addressed by imposition of consent conditions imposed on the future DA and construction design drawings prepared in accordance with Sydney Trains conditions.

6.2 Built Form/Urban Design

Include a detailed justification for proposed tower relocation, increases in GFA, height and floor plate size with consideration to 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 approvals required under the Airports Act 1996 due to the proposed height of the commercial tower.

6.2.1 Height, Bulk and Scale within the Context

The existing site context in the immediate vicinity, in terms of building height, bulk and scale is extremely varied, including small two storey commercial buildings, medium rise residential and commercial buildings of 3 – 8 storeys and several high rise residential and commercial buildings of between 13 and 25 storeys. Nearby Parramatta Square include several high-rise buildings, including a new office tower of at least 40 storeys, currently under construction.

The existing Westfield Shopping Centre, whilst of modest height (18m to 36m), extends over a large area and of the precinct and is therefore a major defining feature of the built form of the locality. This large site is capable of accommodating a large tall office tower in the location now proposed, in a manner that integrates with the existing and future character of the area.

The existing context is likely to change over time as new buildings are developed in accordance with the increase in density and height permitted under PLEP 2011 and as proposed in a several recent Planning Proposals that have been supported by Council and NSW Planning. The 3D view below in **Figure 13**, illustrates the proposed building envelope (in blue) within its future context, including approved but not constructed towers and new proposals.

Figure 13 – Parramatta CBD Future Context



While the existing FSR and building height controls are restrictive and effectively preclude further development, the planning strategy for the Westfield site, as envisaged in Draft Parramatta Draft LEP 2016, proposes to include the subject land within the CBD Core and provide a substantial increase in FSR 10:1 and remove height restrictions on buildings. The proposed tower envelope, as modified, will be compatible with existing commercial built form in the locality in terms of height, bulk and scale and character and closely align with the future built form envisaged for the locality in the Draft LEP.

Figure 14, below shows a 3D view of the proposed office tower envelope, as modified (shown in blue). **Figure 15**, further below, shows an indicative tower form that could be accommodated within the proposed building envelope.

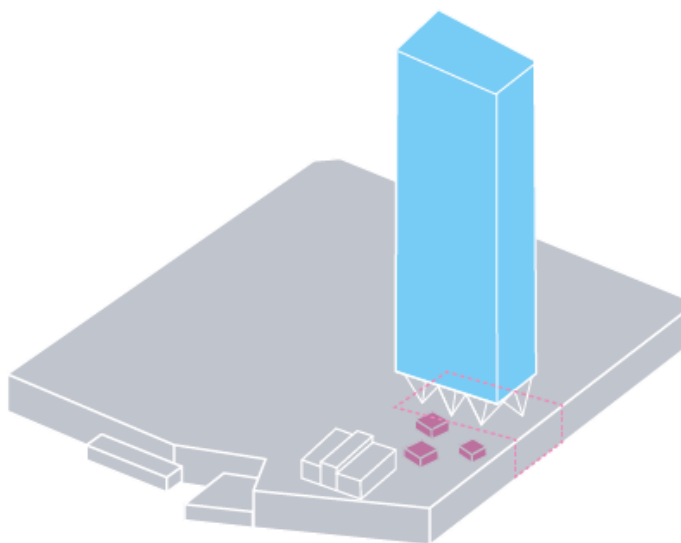


Figure 14
Proposed Office
Tower Envelope



Figure 15 –
View of Indicative
Office Tower Form
Above the Retail
Podium

6.2.2 Justification for GFA, Height and Floorplate Size

The proponent, has since approval of the Concept Plan in 2014, explored opportunities in the marketplace to attract suitable international and national corporations to Parramatta, to occupy the approved 25 storey 35,000m² office tower. Feedback from this process indicates that major prospective tenants require larger floor plates and total floor space in excess of 35,000m². It has not been possible to elicit any major tenant interest in the market place for occupying an office tower of the scale and limited floorplate size that has been approved in the Concept Plan.

Further market analysis indicates that major tenants seeking A Grade office space in Parramatta require floor plate sizes of between 2,500m² and 3,500m². By way of example, the development application submitted in January 2018 by the Walker Corporation for a 56 storey office tower on sites 6 and 8, Parramatta Square, proposes commercial GFA of more than 130,000 accommodated half this floor space accommodated within “campus” floor plates of 3,000m² and the balance of office space within a “tower” floor plate of 2,400m².

The Economic Assessment Report attached at **Appendix E**, demonstrates the need for a larger tower with substantially increased floor space and floor plates, commensurate with what is envisaged for the nearby “Walker” tower. Parramatta Council’s economic consultant Urbis has also advised that larger floor plate sizes are necessary to attract major commercial tenants to the Parramatta CBD. This has resulted in the Council removing its previous restrictions on office tower floor plate sizes.

The Urban Design Report, attached at **Appendix B**, demonstrates that the larger taller tower building envelope form can be suitably accommodated in the location proposed, in a manner that is compatible with the existing and future urban form of the locality.

6.2.3 Amenity Views and Vistas

The Urban Design Report, the Visual Impact Assessment and Sections 6.3 and 6.4 of this EA Report demonstrate that tower building envelope form, as proposed will not have any material adverse impact on the amenity of the locality in terms of overshadowing, visual and acoustic privacy, views and outlook, or visual amenity.

6.2.3 Table of Land Uses Floor by Floor, Breakdown of GFA and Total GFA and Site Coverage

A table of land uses, floor by floor and a breakdown of GFA floor by floor is included in the Urban Design Report. The building is to be used for commercial offices and will have a maximum assessable GFA of 112,000m², provided over 40 office floor levels. 1 of the mid-tower levels will be partially used for plant and equipment and a rooftop plant level is also proposed.

The office building envelope will be located above an existing Department store, with a 3m setback to Argyle Street and retention of the existing 3m wide colonnade at street level. Built form covers the whole of the site in this location and no increase in site coverage is proposed.

The future development application for the office tower will include changes to the existing retail podium, including reconfiguration of the Department store, insertion of supporting columns through the retail podium, provision for loading dock access and waste storage facilities off Marsden Street and bicycle parking and end of trip facilities.

6.2.4 Ground Floor Level Lobby and Street Interface to Argyle Street

The future development application for the office tower will include a new ground floor layout in the location of the existing Department store, to provide an office lobby/entry, cafes, shops, street activation and upgrading of the existing podium façade to Argyle Street. Indicative plans of these works are included in the Urban Design Report. **Figure 16**, below shows an indicative layout of the ground floor level and interface to Argyle Street.

Figure 16 – Indicative Layout Ground Floor Lobby and Retail



6.2.5 Circulation Movements, Access and Linkages

Circulation movements, access and linkages are addressed in the Urban Design Report and the Traffic Report. No new vehicular accesses are proposed. Access to car parking spaces will be via existing car park entry/exit driveways. Loading access will occur via an loading dock access near the northern end of Marsden Street (eastern side). This loading dock will be enlarged and will included an access for cyclists to the future office tower bicycle parking and end of trip facilities.

The primary pedestrian access will be via a new pedestrian mall/office lobby entrance off Argyle Street, centrally located between Church Street and Marsden Street. This new entrance will provide access to both the retail mall and the office lobby lifts and stairs. Other convenient accesses to the office lobby will be available from the existing pedestrian entries at the corner of Church and Argyle Streets and off Church Street, to the south of Argyle Street.

Below ground and above ground pedestrian mall walkways through the existing Westfield Shopping Centre to the transport interchange can be utilised by office workers and visitors, for access to rail and bus services. Improvements are proposed to the intersection of Church Street and Argyle Street and below the rail bridge to provide a more convenient and safer pedestrian access to Parramatta Square and the Church Street retail and café precinct to the north.

6.2.6 – Approvals under the Airports Act 1996

The proposed maximum height (RL) of the building (220m AHD)), does not exceed the Sydney Airport RTCC (243m AHD), but does exceed the Bankstown Airport OLS (156m AHD). Therefore, any future development application will need consider the relevant provisions of the *Airports Act 1996* and the associated regulations. It is unlikely that those provisions would preclude a future office tower of the height proposed. The necessary approval under the Airports Act would be obtained as part of the development application process for the office tower.

6.3 Amenity

Justify the proposal in terms of particular impacts on view loss, sunlight/overshadowing, wind impacts, reflectivity, 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.

6.3.1 OVERSHADOWING

3D Shadow diagrams, at hourly intervals between 9am and 3pm for the mid-winter solstice and for March and September for the proposed modification are attached at **Appendix B**. For comparison purposes, the shadow diagrams also include the shadows that would be cast by the office tower envelope in its currently approved location and form.

The modification proposal has been designed to maintain at least 2 hours and generally 3 hours mid-winter solar access to apartments located to the south, east and west, for those properties that currently achieve at least 2 hours mid-winter solar access. The Apartment Design Guide (ADG) to SEPP 65 recognises that in high density urban areas, such as the Parramatta CBD, 2 rather than 3 hours mid-winter solar access is an acceptable solar access outcome.

Mid-winter shadows cast by the proposed office tower envelope, as modified, primarily fall within the existing Westfield Shopping Centre and adjoining roads. Residential properties to the south, located west of Church Street are north facing and enjoy long hours of mid-winter solar access. Due to the relatively narrow east-west width of the proposed tower, residential properties to the south, west of Church Street experience shadow impacts from the modified tower envelope for a relatively brief period of less than 1 hour. Accordingly, these properties retain solar access in excess of the recommended 2 hour minimum in mid-winter. The single storey heritage item at No. 39 Campbell Street is shadowed in part, by the tower for up to 1.5 hours between 12.45pm and 2.15pm, however, retains adequate solar access outside this period.

Residential properties to the southeast of the proposed office tower envelope, located on the eastern side of Church Street are orientated to the west and southwest and receive more limited mid-winter solar access, generally limited to 2 hours, after 1pm in mid-winter. The residential properties are located on the eastern side of Church Street, north of Parkes Street comprise apartments in high rise mixed use buildings located at 118 Church and 140 Church Street. The podiums of these building contain non-residential floor space.

The approved office tower envelope resulted in mid-winter overshadowing of the existing residential tower at No. 140 Church Street in the late afternoon. The proposed office tower envelope, as modified, has no mid-winter shadow impact on the residential tower at No. 140 Church Street, as it is located further west from the approved office tower envelope.

The recently constructed residential tower at No. 118 Church Street, is like No. 140 Church Street, angled slightly to the southwest, due to the southeast alignment of Church Street in this location. As a consequence, the southwest facing “front” apartments in the southwest corner of the 118 Church Street tower, which have no north facing windows or balconies (unlike those units in the northwest corner of the tower) receive minimal mid-winter solar access.

The office tower envelope, as modified, has no mid-winter shadow impact on the southwest elevation of No. 118 Church Street until after 2.15pm. Units in the northwest corner of the tower will continue to receive at least 2 hours mid-winter solar access.

The ADG acknowledges that in high density urban environments it is not always possible to achieve the recommended minimum of 2 hours mid-winter solar access, particularly where buildings are orientated to take advantage of views, rather than solar access. Any shadowing to southwest orientated apartments will reduce solar access to less than 2 hours. This was acknowledged in the approval of the original office tower envelope, which resulted in lower level west facing apartments at No. 140 Church Street having mid-winter solar access reduced by around 15 minutes, to 1.75 hours in mid-winter.

The apartments in the southwest corner of the residential tower at No. 118 Church Street are oriented in a primarily western direction to take advantage of expansive views to the Blue Mountains. The building has been designed to take advantage of views rather than solar access. The building has also been aligned to the southeast angle of the Church Street alignment, whereas if the tower was designed to optimise solar access, it would have been angled to Church Street, to orientate directly to the west and include at least some north facing glazing and balcony area.

Units in the northwest corner of the tower at No. 140 Church Street include north facing windows and the unit balconies extend beyond the wall of the building to achieve afternoon solar access. Units in the southwest corner of the tower, which represent around 20% of the total number of units in the building, have no northerly aspect and receive minimal solar access to living rooms and very limited solar access to the adjoining balconies. The proposed office tower envelope will have a minor and acceptable solar access impact on these units.

The future office tower form to be developed within the building envelope will not be determined until after a design excellence process and will almost certainly include some building articulation, within the boundaries of the building envelope. Final tower form is likely to have only a minimal and acceptable shadow impact on No. 118 Church Street.

Given the location of the site within a high density commercial area, no increase shadow to any significant public domain area, maintenance of at least 3 hours for north facing residential properties and 2 hours or close to 2 hours for the great majority of apartments that do not face north and improved solar access for No. 140 Church Street, it is considered that the minor extent of additional shadow created by the proposed development to the units in the southwest corner of the residential tower at No. 118 Church Street is acceptable in the circumstances.

6.3.2 ACOUSTIC PRIVACY

An Acoustic Impact Assessment report has been prepared by VIPAC Engineers & Scientists Ltd for the proposed development. A copy of this Report attached at **Appendix Q**. This Report assesses the proposed development in terms of the impacts of external noise intrusion, mainly traffic noise, into the development and potential noise emission from the proposed development to any affected neighbours.

The acoustic assessment indicates that a satisfactory acoustic environment can be achieved for the office tower by providing appropriate façade glazing to the commercial tower that has been designed based on external noise intrusion from road and rail traffic. This would be addressed in the preparation of the DA and Construction Certificate for the office tower.

Typical noise amelioration measures include provision of acoustic enclosures, locating plant and equipment away from noise sensitive areas, shielding extraction ventilation outlets and avoiding direct “line of sight” between the nearest receiver and all major plant equipment and extraction systems.

The Acoustic Report confirms that any noise generated by traffic arising from the office tower would not be expected to exceed the relevant standards and that suitable design and noise attenuation measures can be incorporated into the design of the building to limit noise from plant and equipment to acceptable levels at the boundaries of the site. The Acoustic Report confirms there will be minimal vibration impact on the proposal from the railway line.

All residential buildings in the locality are sufficiently separated from the proposed office tower envelope and office uses are not high noise generators. Traffic noise in the locality would have a far greater impact on the acoustic amenity of residential properties in the locality.

The Acoustic Report indicates that the commercial office tower poses no risk of adverse operational noise impacts on the surrounding noise sensitive locations.

During the construction phase there will be times when construction noise will exceed standard noise management levels due to the proximity of residential, commercial and retail land uses to the work site. Construction work creating high noise levels can be limited to 7.30am to 5.30pm, Monday to Saturday, avoiding the more noise sensitive hours, to mitigate construction noise impacts on the amenity of the area. This can be addressed within the future DA for the tower.

6.3.3 VISUAL PRIVACY

All residential buildings in the locality are well- separated from the office tower envelope, as modified. subject land by busy roads or sites containing commercial development. A separation distance of more than 80 metres is provided to the nearest residential land use. The SEPP 65 Apartment Design Guide (ADG) indicates that a separation distance of 24m or greater provides for adequate privacy in a high density urban environment.

6.3.4 VIEW IMPACTS

View Analysis diagrams and view impact assessment of the proposed building envelope, as modified is included in the Visual Impact Assessment attached at **Appendix L**. This assessment also compares the view impact of the proposal, as modified, with the view impact of the office tower envelope as originally approved.

Views towards the proposed office tower from residential properties located to the west and south of the site will not be materially impacted. From those locations, views across the site are towards existing and planned future high-rise buildings in the Parramatta CBD. The proposed tower will be subsumed into the CBD skyline and form a part of that high-rise CBD outlook.

Views from properties to the north of the site will experience limited impact, due to separation distance and the narrow east-west dimension of the tower. The tower will form a new high-rise form, further to the west of the existing high-rise towers on the eastern side of Church Street. However, the proposed tower has sufficient proximity to those Church Street towers, to be perceived as part of the high-rise skyline, rather than an isolated tower form. It should also be noted that the draft planning controls in the Draft Parramatta LEP 2016, propose to delete the current 36m maximum building height control and, as for the commercial core area of the CBD, remove building height controls on the site, to allow high-rise towers.

The 2 residential towers to the east of the site at No's 118 and 140 Church Street enjoy expansive westerly views to the Blue Mountains. A small portion of this view will be obstructed by the proposed tower, as is the case for the office tower envelope in its current location. Due to increased separation distance, the tower envelope, as modified, provides wider view corridors from some viewing locations.

The view impact analysis includes view lines from the western elevation of the residential towers at 118 and 140 Church Street, from northern, central and southern points in the western elevation of those buildings. The view impact analysis includes envelopes of future high-rise buildings that have, either been approved, or are proposed in Planning Proposals that have been supported for Gateway. View lines 1, 2 and 3 relate to views from No. 140 Church Street and view lines 4, 5 and 6 relate to views from 118 Church Street.

With respect to No. 140 Church Street, the office tower envelope, as modified, increases the width of the view corridor in Views 1 and 3 and marginally narrows the overall view corridor in View 2. With respect to No. 118 Church Street, the office tower envelope, as modified, increases the width of the view corridor in all 3 views.

The Land and Environment Court has established view sharing principles in the matter of *Tenacity Consulting v Warringah* (Proceedings 10096 of 2003). These principles relate to assessing the quality of the views affected, whether such views are a whole or partial view, the extent of impact on the view, the extent of compliance of the proposed development, the context of the view (e.g. whether across a rear or side boundary) and the design merit of the proposal.

The above view sharing principles should be applied with a degree of caution in a high-rise CBD context, where view impacts are traditionally given less weight. Notwithstanding this there will be no unacceptable view impacts as viewed from residential properties in the locality and any such impacts are broadly similar, or marginally less than the office tower envelope, as currently approved.

Parramatta DCP 2011 places priority on identified strategic view corridors. The proposal does not impact on any of the identified view corridors in the DCP.

6.3.5 VISUAL IMPACT

A detailed visual impact analysis of the proposed building envelope, as modified is included in the Visual Impact Assessment attached at **Appendix L**. This assessment also compares the visual impact of the proposal, as modified, with the view impact of the office tower envelope as originally approved. The proposal will have a limited and acceptable impact on the visual amenity of the locality. Visual impact is addressed in more detail in Section 6.4 of this EA Report and in Appendix N.

6.3.6 SAFETY AND SECURITY

The proposed modification relates to an office tower envelope only. There will be controlled access for entry to the office tower and the future tower will include security staff and CCTV. The principles of crime prevention through environmental design (CPTED) will be considered in the future design of the office tower and suitable measures incorporated to optimise opportunities for passive surveillance, minimise concealed spaces in areas frequented by the public and ensure that a functional, legible and safe internal pedestrian circulation system, including directional signage, is provided. Ample lighting can be provided within and around the future office tower. Increased street activation to Argyle Street will enhance surveillance of public domain in this busy street which also provides bus parking.

A risk assessment and safety in design report will be prepared in conjunction with the design of the building and the associated future development application.

6.3.7 WIND IMPACTS

A preliminary Wind Impact Assessment Report for the office tower envelope, as modified, has been prepared by WINDTECH. A copy of this report is attached at **Appendix O**. The WINDTECH Report considers exposure of a potential office tower constructed within the building envelope to wind, regional wind climate, geometry and orientation of the proposed development, interaction of flows with adjacent developments and assessment criteria, determined by the intended use of the public areas affected by wind flows generated or augmented by the proposed development.

The wind impact assessment confirms that the proposed 3m tower setback to Argyle Street, in combination with the retained 3m wide colonnade along the Argyle Street frontage of the site will result in wind conditions that will be either equivalent to, or better than the current conditions experienced along Argyle Street and Marsden Street and that from a wind mitigation point of view, there is no need to set the tower further back than what has been proposed.

WINDTECH advise that wind mitigation treatments will be required for the Level 6 terrace shown in the office tower concept plans to achieve the desired wind speed criteria for pedestrian comfort and/or safety. Recommended measures such as 2m impermeable screening along the northern and eastern perimeter, inclusion of an impermeable awning of at least 3m along the southern edge of the restaurant and along the eastern edge of the tower slab can be provided for in the design of the tower, when the DA is prepared. Further wind tunnel testing would also be required as part of the detailed design stage.

6.3.7 ODOUR IMPACT

The proposal will result in minimal odour impacts within the locality. An odour impact assessment prepared by VIPAC and addressing potential odour impacts from future tenants is attached at **Appendix S**. This assessment notes that key odour impact issues relate to food premises, including restaurants and cafes, waste management and ventilation systems.

Food premises, including restaurants and cafes would be confined to the ground floor Argyle Street office lobby/retail area and the proposed Level 6 terrace area. Waste storage for the office tower will be located off the loading dock near the northern end of Marsden Street (eastern side). The service area will be extended to accommodate additional waste storage facilities.

The odour impact assessment indicates there will be no unacceptable odour impacts provided that suitable measures are in place in relation to ventilation systems and waste management. These measures include:

- Design of ventilation systems to comply with AS1668.2 and certified accordingly.
- Exhaust stack heights must be at least 3m above the roof height at the point of discharge.
- Refrigerated areas must be provided for storage of any putrescible waste.
- Waste storage areas must be located as far as practical from the site boundary.
- A service schedule must be implemented for maintenance of ventilation systems.
- Waste storage areas should be kept clean and external bins are to be kept closed to eliminate odours and keep fauna from interfering with waste.

The above matters would be addressed in the design of the office tower, as part of the preparation of the DA for the building.

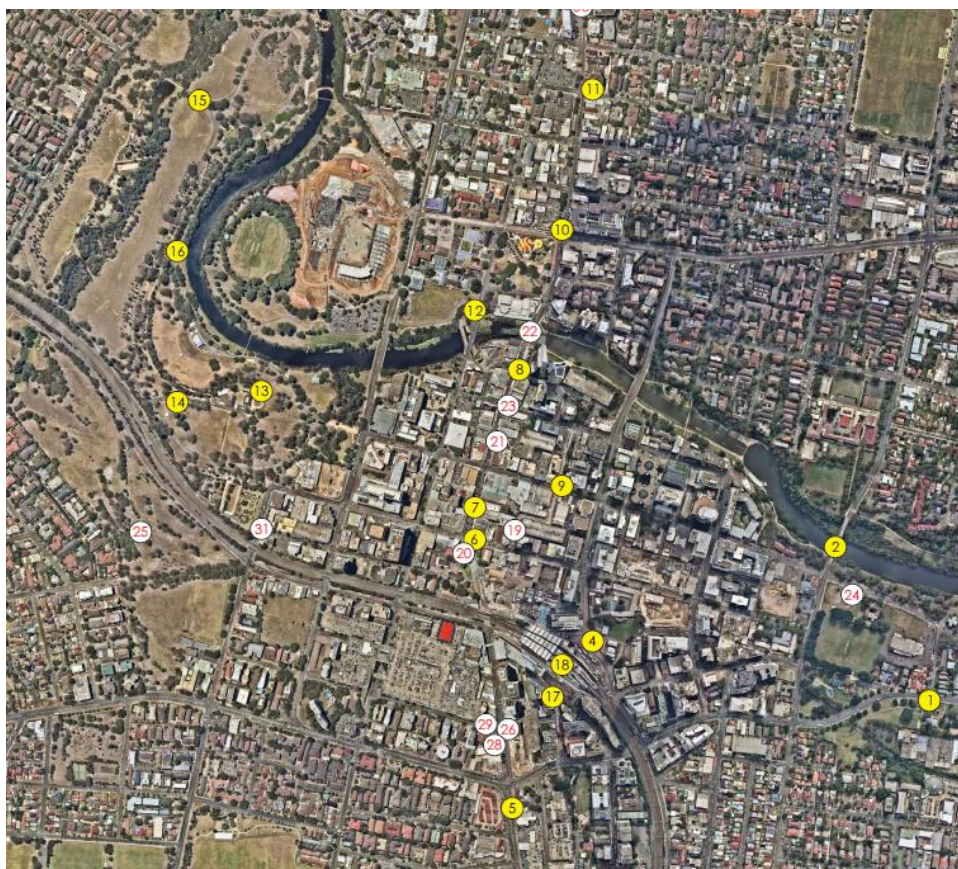
6.4 Visual Impacts

A detailed visual impact assessment (VIA) must be undertaken to identify the visual changes and view impacts of the project to/from key vantage points and surrounding land. Photomontages of perspectives should be provided showing the project. The VIA 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.

A detailed visual impact analysis of the proposed building envelope, as modified is included in the Visual Impact Assessment (VIA) attached at **Appendix L**. This assessment also compares the visual impact of the proposal, as modified, with the view impact of the office tower envelope as originally approved.

The VIA includes visual impact assessments from 17 key vantage points as identified in the photomontage view locations map (Map 1 in the VIA Report). A copy of this map is reproduced below as **Figure 16** and shows the viewing locations with numbered yellow circles.

Figure 16 – Photomontage View Locations Map



The VIA documents and analyses existing views, analyses baseline factors, analyses the extent of visual effects and assesses visual impacts from each of the viewing locations. The VIA found the overall impacts of the proposed modification to be low and acceptable and do not require extensive recommendations for impact mitigation.



Figure 17
Photomontage View from
Old Government House,
Parramatta Park

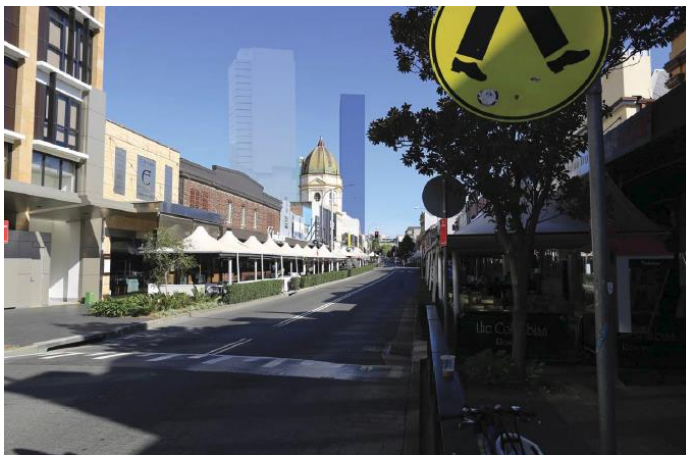


Figure 18
Photomontage View
from Church Street
(North of Phillip Street)

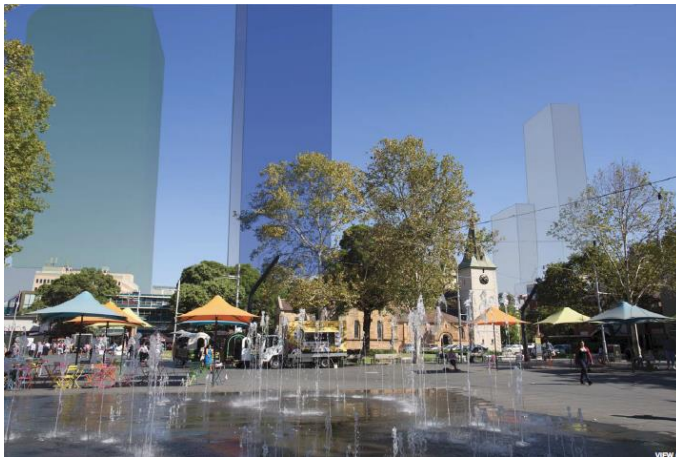


Figure 19
Photomontage View
from Parramatta Square
to St Johns Church

The VIA assessed the level of change caused by the proposed modification compared to the tower building envelope, as currently approved in the Concept Approval, particularly with respect to close sensitive views and formed the opinion that the proposal, as modified, has a similar level of visual effects and impacts on close, sensitive views. The VIA concluded that additional, incremental or residual impacts that would be caused by the modification were considered compatible with the approved Concept Plan and the existing and emerging visual context. The VIA further concluded that specific concerns to manage and reduce visual impacts on key views south along Church Street and from view locations near Old Government House and in Parramatta Park would be met in the project.

6.5 Traffic, Car Parking, Transport and Access (Operation) and Transport Impacts (Operational)

The Environmental Assessment (EA) shall include a Transport and Traffic Assessment that provides, but is not limited to, the following and prepared in accordance with the relevant guidelines:

- *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 generated by the proposed development, including vehicle, public transport, walking and cycling trips during operation*
- *An assessment of the existing and future performance of key intersections providing access to the site and 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 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 Transport for NSW, 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*
- *Proposed bicycle and car parking provision, including justification, demonstrating compliance with relevant RMS guidelines and Australian Standards*
- *The adequacy of existing and future public transport, pedestrian and bicycle provisions to meet the demand of the proposed development*
- *Proposed public transport, pedestrian and bicycle facilities as part of the development*
- *Proposed access arrangements including service and emergency vehicles.*

Provide a Transport Management and Accessibility Plan based on the findings of the Transport and Traffic Impact Assessment including measures to encourage sustainable travel and non-car mode share, (e.g. implementing a sustainable travel plan and provision of end of trip facilities).

A Transport Management and Accessibility Plan (TMAP) for the proposed modification has been prepared by Colston Budd Rogers and Kafes Pty Ltd (CBRK), addressing traffic, transport and access issues and impacts. A copy of this TMAP is attached at **Appendix K**. The CBRK TMAP reviews the traffic, transport accessibility, servicing and parking implications of the proposed modification, including a comparison with the building envelope, as originally approved, with respect to these parking, traffic and transport matters.

Traffic Generation and Car Parking

While the proposed office tower envelope, as modified, will accommodate more than 3 times the commercial floor space, as office tower envelope, as currently approved, the amount of parking for the proposed office tower remains at 100 car spaces. This ensures that there is minimal change to traffic generation arising from the much larger floor space.

Development of an office tower within the proposed building envelope, as proposed, will also result in a reduction in retail floor space within the existing retail podium, below the tower envelope to accommodate vertical transport and supporting columns for the tower.

Given there will be no increase in car parking for the office tower envelope and after allowing for replacement retail area on the ground floor around the proposed office lobby and potential for new retail floor space on the roof terrace of the podium, there is still a net reduction in retail GFA of at least 265m² (1,700m² GLA), resulting in a small reduction in traffic generation. The combination of no increase in car parking for the office tower envelope and a small reduction in retail floor space, will result in a minor reduction in traffic generation, or at most no increase in traffic generation.

Development of the office tower within the envelope and location now proposed will require partial demolition of 1 car parking deck (Part of Level 6M)) and changes to parking layout and service arrangements which will result in the loss of 273 existing car spaces.

The existing approval provides for a net increase of 562 car spaces. After allowing for a reduction in 273 existing car spaces, arising from the relocation and enlargement of the office tower building envelope, as now proposed, the net increase in car parking will reduce from 562 car spaces to 289 car spaces, further reducing the potential for traffic generation. Condition A6 of the Concept Approval, prescribing 562 net additional car parking spaces, should be amended to prescribe 289 additional car spaces, which are to be provided as part of the Stage 1 development (additional retail level and car parking decks).

Car parking requirements are set out in clause 7.3 of Parramatta LEP 2011 and prescribe maximum, rather than minimum parking rates in order to reduce reliance on use of private motor vehicles and encourage use of public transport. The applicable rates are a maximum of 1 car space per 100m² of commercial GFA and a maximum of 1 car space per 30m² of retail floor space. On this basis, the proposal to retain 100 car spaces for the larger office tower floor space is fully compliance with clause 7.3 of the LEP, with respect to parking provision. Charges apply for the retail parking areas, with higher rates for longer stay parking, hence discouraging office workers from using retail parking.

CBRK have reviewed the overall parking provision for the Westfield Shopping Centre as a whole, including the proposed office tower envelope. When the additional retail level and associated parking is completed (and after allowing for loss of parking associated with the proposed office tower envelope), there will be 4,640 car spaces for retail activity on the site and 100 car spaces for the office tower.

CBRK have calculated existing parking demand at 90% occupancy and advise that existing parking demand equates to 1 car space per 34m² GLA. Assessed at this rate of would require a total retail parking provision of some 4,640 car spaces, which is consistent with the proposed parking provision, as outlined above.

Impacts on Performance of Key Intersections

CBRK has advised that as a result of reduced car parking arising from the proposed modification and no increase in proposed car parking for the larger office tower, the modification will result in traffic generation in the peak hour of some 20 to 40 vehicles per hour (two-way) less than assessed for the development, as originally improved. Accordingly, there will be no increased impacts on the nominated key intersections.

Consequently, no further traffic analysis is warranted. It is clearly evident there will be no increase in traffic on the road network and at key intersections, arising from the proposed modification, notwithstanding increased floor space.

The Project Approval for the retail/car parking additions includes a requirement at Condition B6 for road improvement works at nominated locations to mitigate transport impact of the proposed development. The nominated works are as follows:

- (a) *Traffic and transport improvement works on the Great Western Highway, between Church Street and O'Connell Street, including the intersection of the Great Western Highway and Marsden Street. Please note that this intersection improvement works involve road widening.*
- (b) *Improvement works at the intersection of Church Street and Campbell Street.*

The above works are required to be completed prior to occupation of the approved, but not yet constructed additional floor space on Level 6. Work on some of these road improvements is already underway and it may be expected that all works would be completed by the time construction of the additional retail level is completed.

In the circumstances, the appropriate way of addressing key intersection works for the office tower envelope, is to apply the same conditions relating to road works that are contained in the Project Approval for the retail/parking additions i.e. Conditions B6, B7 and B8, to the future Project Approval or DA Consent for the proposed office tower.

Impact on the pedestrian and transport facilities, the bus operation and pedestrian movements along Argyle Street

The office tower envelope front setback correlates with the existing front wall setback of the existing retail podium in Argyle Street. This has been interpreted as a zero setback, when in fact the retail podium is setback 3m to Argyle Street, behind an existing colonnade, which is to be retained. Accordingly, a relatively wide pedestrian area extending to a width of at least 5m is available along the southern side of Argyle Street.

CBRK confirm that there is sufficient pedestrian space/width to readily accommodate existing pedestrian flows and any additional pedestrian flows generated from the relocated larger office tower, without creating congestion for pedestrian traffic. There will also be no changes to or impacts on existing transport facilities and bus operation in Argyle Street, arising from the proposed modification.

Bicycle and Motor Cycle Parking Provision

Bicycle and motor cycle requirements are set in Parramatta DCP 2011. For commercial/retail development bicycle parking is required at the rate of 1 space per 200m² and motorcycle parking, 1 space per 50 car spaces. CBRK indicate that 550 bicycle parking spaces and 17 motor cycle parking spaces are required for the office tower.

The provision of the required bicycle and motor cycle parking will be included in the DA plans for the future office tower, in a location that provides convenient access to the office tower. Bicycle access will be provided from Marsden Street (east side) near Argyle Street, which is a designated cycleway. Appropriate end of trip facilities will be provided adjacent to the bicycle parking area.

Public Transport

CBRK demonstrate that there is an extensive range of high quality frequent public transport services available at the nearby Parramatta rail and bus interchange located within 250m walking distance of the office tower site. The site is also within walking distance of the planned Parramatta Square light rail stop. Convenient and safe pedestrian access to public transport will be available via Argyle Street, or Church Street. A Travel Access Guide will be prepared to provide information on public transport services to the site to encourage workers and shoppers to utilise public transport.

Access Arrangements for service and emergency vehicles

The office tower, as currently approved, was to be developed adjacent to the southwest corner of Church Street and Argyle Street, with service access from the Aird Street (east) loading dock. With the proposed relocation of the office tower envelope further west, service vehicles and loading and unloading activities will occur from the nearby Marsden Street (east) loading dock. This dock will be expanded to service the office tower. Emergency vehicles will also be able to utilise this dock or park (short-term) in Argyle Street, adjacent to the office tower ground floor lobby.

Transport Management and Accessibility Plan

CHRK's traffic impact assessment reveals that there will be reduced traffic generation from the proposed development, as modified. The net amount of additional parking will be reduced from 562 car spaces to 289 car spaces, which will increase incentives to utilise public transport and reduce car dependency.

The modification application includes a Transport Management and Accessibility Plan (TMAP), attached at **Appendix K**. The TMAP addresses the matters raised by Transport for NSW and indicates that suitable measures are proposed to encourage sustainable transport and travel by non-car modes and satisfactory car parking and access arrangements are achieved and necessary bicycle, motor cycle, accessible and car share parking can be provided on site. The TMAP also confirms that the increase in bus and rail trips generated by the proposed development can be accommodated by the existing spare capacity of those services and existing pedestrian paths on Argyle Street can accommodate the additional pedestrian trips.

Construction Traffic

A Construction Management Plan (CMP) will be prepared prior to the issue of the Construction Certificate for the office tower. The CMP will outline how the construction process will be managed, including construction vehicle access, construction facilities and storage, safety and environmental management and construction zones.

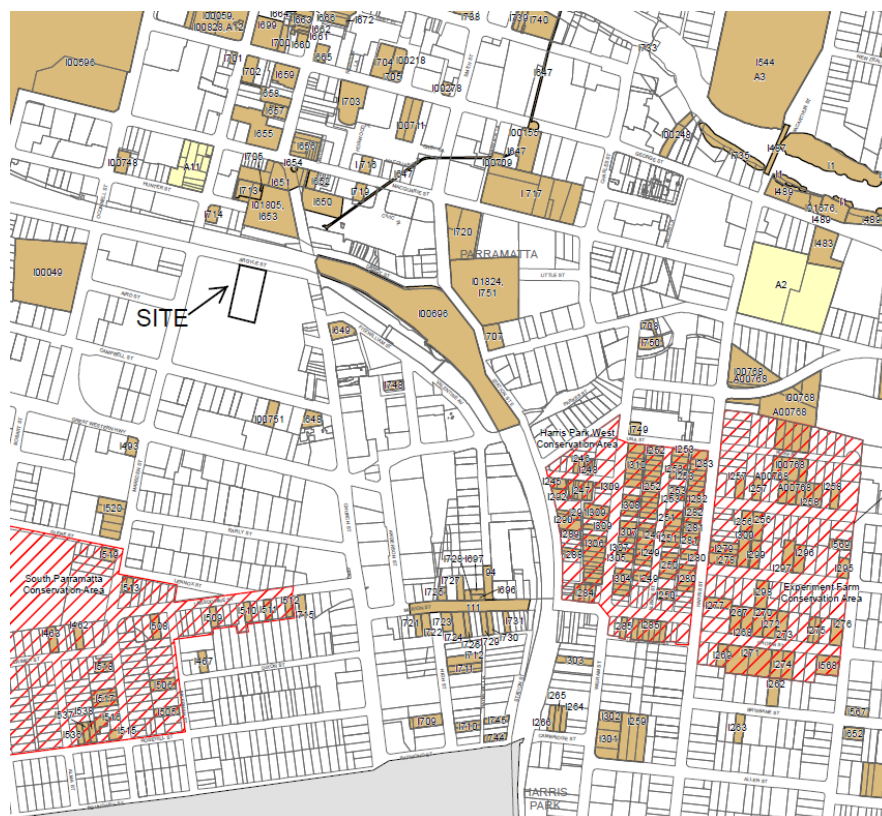
The proposed development of the office tower and the approved additional retail/parking facilities will be constructed in separate stages to minimise construction related impacts. A rooftop construction zone will be established on top of the existing retail podium adjoining the proposed location of the office tower, as modified. The approved additional car parking decks will be constructed and utilised prior to construction work commencing on the office tower, to maintain adequate parking for shoppers and shopping centre employees.

6.6 Heritage

The EA shall include a Heritage Impact Statement (HIS) prepared by a qualified Heritage Consultant which, in conjunction with the VIA, 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.

The subject land is not located within a Conservation Area and does not contain any items of heritage significance. There are however, several items of heritage significance near the subject land, which have been identified as heritage items in PLEP 2011. These include Parramatta Railway Station, the old fire station in Church Street, David Lennox's house at 39 Campbell Street, the Masonic Centre at 47 Campbell Street and St John's Cemetery in O'Connell Street. **Map 9**, below is an extract from the PLEP 2011 Heritage Map showing the locations of heritage items near the site and within the locality.

Map No 9 - Parramatta LEP 2011 – Heritage Map Extract



A Statement of Heritage Impact (SHI) has been prepared by heritage consultants, NBR Architecture. A copy of this Assessment Report is attached at **Appendix R**. This Statement analyses the heritage context around the site and assesses the proposal in relation to nearby identified heritage items and view lines to and from those items. The SHI has identified 24 state and locally listed heritage places within a nominal 350m radius of the proposal and focussed its impact assessment on those places, as well as the Australian Convict Sites, Old Government House and Domain, Parramatta.

The SHI notes that of the 24 heritage items considered, only 2 items will be subject to minor overshadowing in the middle period of the day, being Lennox House and the Masonic Centre, located to the south and southeast of the site in Campbell Street. The shadow impact does not materially impact on the heritage values of these sites and both sites will continue to enjoy 3 hours mid-winter solar access.

The SHI appropriately notes the site is located within an area of high density development and that high-density development impacts on views to and from heritage items. The proposed office tower envelope, as modified, has limited and acceptable impacts on view lines to and from heritage items and the heritage values of those heritage items.

The SHI identifies that the proposal will form a termination in the view along Church Street, looking south towards the heritage item "St Johns Church" located in Church Street some 150m north of the site. This view is identified in the PDCP (Section 4.3.3.4) as View 3 – Views to St Johns Church and Square from the north. The SHI notes that this view line terminates at the Church and the proposed development is located to the south of the Church, thus providing a backdrop to this view. The SHI further notes that the Church is not currently visible in this view due to existing planting in Church Square. The SHI concludes that the appreciation of the Church and its setting of Church Square is not impacted by the proposal.

PLEP 2011 permits building to be constructed to a height of 28m on the northern side of the railway embankment, between the site of the proposed tower and St Johns Church. Future buildings on this land will form the immediate backdrop to View 3, looking south from Church Street, which terminates at St Johns Church. The proposed office tower will be perceived as a background element in View 3, visible only above the skyline interface, in View 3. The SHI recommends that any impact on the view south to the Church could be minimised through careful façade detailing in the design of the tower. This can be addressed in the design excellence process that will form part of the preparation of a future DA for the tower.

Old Government House and Domain are located in Parramatta Park, more than 500 metres northwest from the proposed development, and form part of the World Heritage listed cultural property known as Australian Convict Sites and are included in the National Heritage List. The proposed office tower will be seen from these locations, primarily as part of the background in the view line, as is the case for other existing towers and the high-rise office tower being constructed in Parramatta Square, adjoining Church Street.

The SHI considers potential impacts on the heritage values of Old Government House in Parramatta Park, including the vista from this important heritage item. As noted above, the outlook from these heritage items is changing, with the changing skyline of the Parramatta CBD, as more high-rise tower buildings are constructed. The SHI concludes that the proposal is compliant with requirements of the Conservation Agreement for the protection and Conservation of World and National Heritage Values of Australian Convict Sites, Old Government House and Domain Parramatta.

There are no heritage issues or impacts that would justify refusal of the proposed office tower in the general form and location proposed.

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6.7 Public Domain and Public Access

The EA is to outline the scope of the public domain improvements, street activation, key pedestrian linkage with and between other public domain spaces, existing and proposed buildings and surrounding areas, including Parramatta Rail Station and Parramatta Transport Interchange. The EA shall include a Public Domain Upgrade Plan for the project covering the street edges of Church, Argyle, Marsden, Aird and Campbell Streets.

The Parramatta City Centre Civic Improvement Plan (Amendment 4) provides a description of Council's desired public domain improvements for the Parramatta CBD, and includes planned improvements to the CBD that are anticipated to cost in excess of \$200 million. Identified public domain projects in the vicinity of Westfield Parramatta are outlined in Section 8. The Civic Improvement Plan has been considered in the preparation of a Landscape and Public Domain concept for possible public domain improvements is attached at **Appendix D**. This plan will be further refined and developed in consultation with Council for inclusion in the future office tower DA.

The concept plan provides for a range of public domain improvements around the site as envisaged in Council's Civic Improvement Plan, including landscaping, street furniture, improved lighting, new paving in selected areas, improved pedestrian crossings and public art.

Improvement works include street activation to the northern Argyle Street ground floor elevation of Department stores Department store. Works proposed to the Argyle Street frontage include retail display windows, a café and outdoor seating, pavement and landscaping improvements, cladding of columns and soffit and additional lighting. Works proposed to the Church Street frontage include cladding of columns, lighting, pavement and landscaping improvements. **Figure 20**, below is an extract from the Landscape and Public Domain Report showing potential retail activation and outdoor seating along the Argyle Street frontage, adjoining the existing bus bay.

Figure 20 – Argyle Street Retail Activation and Outdoor Seating.



Westfield Parramatta provides a high level of pedestrian connectivity to the Parramatta Transport Interchange, including below, at grade and above ground connections. The Centre includes numerous pedestrian entries to optimise pedestrian accessibility to and from the shopping mall from both public roads and from the various car parking levels.

Major pedestrian entries from public roads are provided in Argyle Street (near corner of Church), Church Street, underground from the Rail Station in Argyle Street and at ground level from the Bus Interchange in Argyle Street. Secondary pedestrian entries are provided from Aird Street, Marsden Street and Campbell Street.

The Parramatta Public Domain Guidelines provide Council's public domain requirements relating to development and include a requirement to prepare an Alignments Plan, Public Domain Plan and Street Tree Plan. Works envisaged for the public domain will be designed in accordance with Council's Guidelines and an Alignments Plan, Public Domain Plan and Street Tree Plan provided with the future DA. A range of civic improvements are proposed for the CBD, some of which are relevant to Westfield Parramatta, including:

- East-west pedestrian connection along former Aird Street alignment through the Westfield shopping centre from Church Street to Marsden Street
- North-south pedestrian connection, mid-way between Church Street and Marsden Street, through the Westfield shopping centre from Argyle Street to Campbell Street.
- Pedestrian connections from Argyle Street through to Fitzwilliam Street.
- Enhanced railway underpasses (e.g. artwork), Church Street, Marsden Street, O'Connell Street and Pitt Street.
- Enhance corridor along Church Street – Parramatta's main street, outdoor eating area and retail spine, with Church Street South forming an entertainment precinct of cinemas and Asian shopping and dining, where outdoor dining is encouraged.
- Enhance O'Connell, Marsden and Wentworth Streets as connections to the City Centre using street trees, lighting and paving.
- Create gateways e.g. large-scale artworks along the Great Western Highway at the intersections of Pitt, O'Connell, Marsden and Church Streets.
- Implement a street tree planting program – Pyrus Chanticleer trees along Argyle and Church Streets, Brush Box along O'Connell and Marsden Streets, Blueberry Ash along Campbell Street.
- Facilitate a pedestrian and cycle amenity zone in the area north of the Great Western Highway-Parkes Street to the river and east of Marsden Street to Charles Street.
- Enhanced street footpath paving, signage and lighting, with opportunities for installing public art in suitable locations e.g. Church Street South.
- Enhance Wentworth Street car Park and connections to Church Street and Wentworth Street.
- Undertake special City Centre projects such as enhancing the river foreshore park, upgrading the aquatic centre, conservation of heritage buildings, develop a multi-purpose arts and cultural facility and provide new community facilities in the Civic Place precinct.

Several of the above projects have been considered in preparing concepts for improvement of the public domain in the vicinity of the proposed office tower. A substantial \$7.12 developer levy of more than \$10 million will be payable for the future office tower and can be used towards funding nominated public domain improvements, in addition to other community/recreational/cultural facilities proposed for the CBD. A concept plan for improvements to the public domain adjoining and near the proposed office tower is attached at **Appendix D**

6.8 Economic Justification

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

An Economic Assessment of the proposed development, prepared by JLL, is attached at **Appendix E**. This assessment addresses the need for an office building of the type proposed in the Parramatta CBD and the appropriateness of the extent of floor space and size of floor plates proposed in the building. The Economic Assessment concludes that the proposed A Grade office tower proposal, as modified, is suitably located, is an appropriate form of development in terms of the extent of floor space proposed, floor plate size and will assist in addressing the current significant undersupply of A Grade office space in Parramatta. In reaching this conclusion the Economic Assessment notes the following key points.

The site is close to the Parramatta Railway station, benefitting from access to retail and transport amenity, therefore being a highly suitable location for high-rise commercial development.

NSW has recently experienced a strong state economy and current market conditions are conducive to investment.

A grade office space makes up 45.9% of the Parramatta office market (total stock 739,406m²) and there is a very low vacancy rate (0.4%) for such office space in Parramatta.

The proposed site is attractive to potential occupiers, particularly in terms of access, business to business (clustering, recognised corporate location, specialised infrastructure) and amenity.

In recent years there has been a growing demand for large floor plate office accommodation driven by a range of factors.

Vacancy rates for large floor plate (minimum 2,000m²) office space in Sydney suburban market is 4.7% compared to a much higher vacancy rate of 7.7% for smaller floor plate office space.

Proposed floor plate size of at least 2,450m² is more appropriate for the current demand in the market, compared to the 1,400m² floor plate provided for in the office tower, as originally approved.

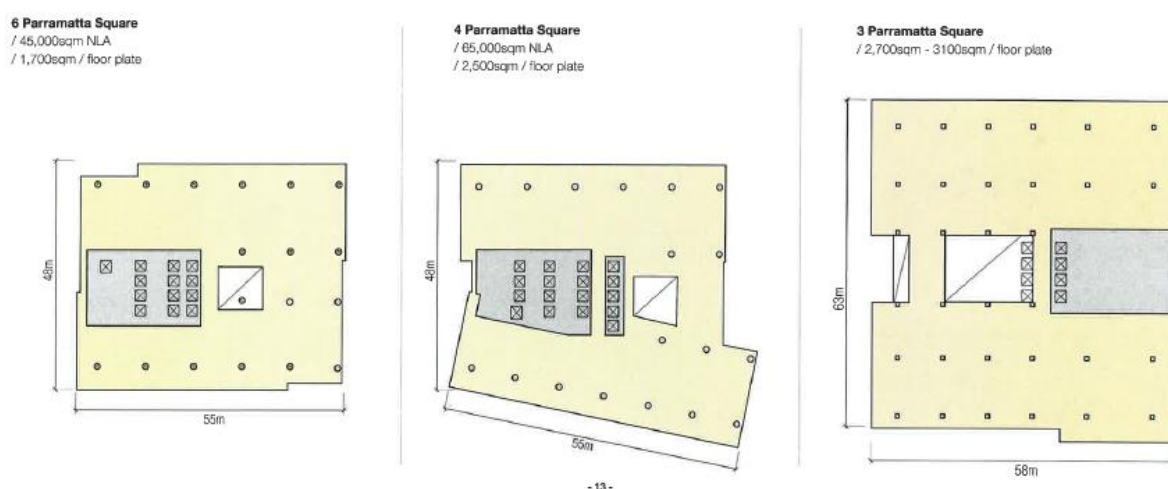
Major tenants are typically looking for office spaces of between 15,000m² to 30,000m², with some seeking spaces as large as 70,000m². An A Grade office tower of 100,000m² NLA is feasible and can suitably accommodate 2 to 3 major tenants.

Provision of large floor plate sizes in the Parramatta office market enables prospective tenants, who would otherwise be confined to business park locations, to locate within the Parramatta CBD.

The strong demand for A Grade large floor plate office space is evidenced by the yet to be constructed 62,000m² Walker officer tower proposed for Parramatta Square. This large area of office space is fully pre-leased by the NSW Government.

Following concerns about the slow pace of development of new A Grade office buildings in the Parramatta CBD, Parramatta Council in 2015, commissioned Urbis to assess the requirements for attracting additional A Grade commercial floor space to the Parramatta CBD. This assessment recommended allowing larger floor plate sizes to provide increased efficiency and allow more staff to be located on the same floor. Council subsequently removed its previous restrictions on commercial office floor plate sizes, which applied when the original tower envelope proposal for the Westfield site was assessed and approved in 2014, subject to a 1,400m² limit on floor plate size. **Figure 17**, below provides some examples of recently approved large office floor plates in the Parramatta CBD.

Figure 21 – Examples of Large Floor Plate Sizes Recently Approved in the Parramatta CB



Parramatta is a major employment hub in Sydney's west and in the Sydney metropolitan Strategy 2063, is anticipated to provide an additional 27,000 jobs by 2036. Substantial additional floor space will be required in the Parramatta CBD to accommodate this employment growth. Currently Parramatta has a constrained supply of A Grade office floor space with floor plates of sufficient size to accommodate larger businesses and government agencies.

Compared to other major commercial centres such as the Sydney CBD, North Sydney and Macquarie Park, the CBD of Parramatta has only a modest percentage of its total office floor space in the form of A Grade office space, a relatively limited number of major office buildings and is significantly undersupplied with large floor plate office buildings. The proposed office tower, as modified, will make a significant contribution towards addressing these shortcomings in current office floor place supply in the Parramatta CBD and reinforce Parramatta's role as the major employment hub for western Sydney.

6.9 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.

An overview report of the environmentally sustainable design (ESD) goals for the proposed office tower modification is attached at **Appendix R**. As the proposal is for a building envelope only, the ESD assessment primarily relates to how the future office tower can be designed to achieve ESD best practice. It is proposed that the office tower building will achieve a 5 Green Star rating through the implementation of initiatives that will:

- Minimise energy consumption through smart façade design, efficient air conditioning systems, efficient lighting design and good management of building systems;
- Minimise its water consumption through water recycling and efficient fittings;
- Reduce materials consumption and focus on using low-emission and recycled materials;
- Provide healthier, more comfortable internal conditions of the building occupants.

Key proposed ESD initiatives for the building include use of energy efficient appliances and plant, particularly in terms of air conditioning plant, low energy lighting, use of natural light wherever possible, energy monitoring, water efficient appliances, rainwater capture for re-use in the office tower and demolition and construction waste recycling.

A Green Star assessment will be completed as part of the detailed design of the office tower to confirm that the building can attain an overall Green Star weighted score sufficient to achieve a 5 Green Star rating. The office building will also be designed to achieve a minimum 4.5 star NABERS Energy office base building rating.

Appropriate consideration of ESD initiatives in the design stage of the building is critical for optimising energy and water efficiency and providing a good indoor environment quality. Principles to be employed during the design stages are shown in the following table.

ESD Principles - Design Stage

<i>Built Form</i>	<p>Analysis and understanding of solar heat loads within the building to optimise the facade, reducing energy consumption whilst maximising the benefits of natural daylight and external views</p> <p>Optimised built form and facade to minimise embodied energy into the development</p> <p>Optimised built form to maximise indoor environment quality.</p>
<i>Mechanical Design</i>	<p>Selection and design of efficient air conditioning plant</p> <p>Implementation of variable operation components to control the building efficiently and high and low loads</p> <p>Enhanced controls to automatically control plant and equipment for optimum efficiency</p> <p>Consideration to additional systems and capacity to enhance indoor environmental quality. Ventilation rates will be increased above the minimum requirements to improve indoor air quality of the occupied building.</p>

<i>Electrical Design</i>	<p>Selection and design of lighting systems which provide high light levels with low energy consumption</p> <p>Enhanced controls to automatically control plant and equipment for optimum efficiency including a zone switching and daylight dimming</p> <p>Design of electrical systems to enable monitoring of energy consumption, water consumption waste generation in association with building plant and equipment.</p> <p>Consideration of systems that enhance indoor environment quality including appropriate lighting levels and reduction of lighting flicker associated with fluorescent lighting</p> <p>Consideration to low carbon electricity sources such as photovoltaics.</p>
<i>Hydraulic Design</i>	<p>Selection and design of systems with a low potable water consumption requirement</p> <p>Dual water pipe-work, with one set connected to end uses requirement potable water (taps and showers) with the other set used for non-potable water (WCs, urinals and cooling towers)</p>
<i>Transport</i>	<p>Promotion of alternative forms of transportation, including cyclist facilities, public transport and low emission vehicles.</p>

During the construction stage there will be a number of ESD principles that will be employed to reduce materials consumption, improve the indoor environment quality of the finished building and ensure efficient operation of the systems. Principles are summarised in the table below:

ESD Principles - Construction Stage

<i>Commissioning</i>	<p>Detailed commissioning of the building's mechanical, electrical and hydraulic system to ensure efficient operation</p> <p>A 12 month building tuning process to optimise the systems through differing weather events and occupancy rates.</p>
<i>Construction Practices</i>	<p>A comprehensive environmental management plan will be implemented to minimise the impact on the immediate environment</p> <p>80% of construction waste will be either reused or recycled</p> <p>Construction energy and water consumption will be monitored to minimised wastage.</p>
<i>Materials Selection</i>	<p>Materials installed in the building during construction will be low in volatile organic compounds and low in formaldehyde emissions to improve the indoor air quality of the finished building</p> <p>PVC and timber will be sourced from lower environmental impact manufacturing and plantation</p> <p>A Life Cycle Assessment of the building's environmental impacts will be conducted to assess the operation for replacing materials to reduce impact.</p>

The operational stage of the building is when the design and construction initiatives will be actioned to achieve reductions in resource consumption and improvements in indoor environment quality. The initiatives for the operational phase of the proposed additions are summarised in the following table.

ESD Principles - Operational Phase

<i>Knowledge Transfer</i>	<p>A detailed transfer of knowledge from the construction team to the buildings operational team to ensure all sustainable design initiative are fully coordinated into the operation</p> <p>After project handover all building systems will be continuously tuned and monitored to ensure efficient operation</p> <p>A building users' guide will be provided to the building operator and the occupants to explain the correct management of the building.</p>
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<i>Ongoing Management</i>	The energy, water and waste monitoring system will be monitored on a monthly basis to identify and rectify areas of wastage and to drive continual improvement A NABERS Energy and Water rating of 4.5 stars will be achieved on a monthly.
<i>Fit out and Refit Considerations</i>	A detailed guide to tenancy fit out and re-fit will be developed to provide information to tenants to minimise their environmental impact and ensure appropriate integration. This guide will include: <ul style="list-style-type: none"> o Lighting types and maximum power allowances o General equipment maximum power allowances o Requirements for lighting and equipment controls o Materials usage guidelines for reduced embodied energy o Waste reduction techniques and requirements

Ecological sustainability issues relating to resource consumption, amenity and relevant codes and ratings is considered in detail in the Ecological Sustainable Design Report attached at **Appendix P**.

The Parramatta DCP 2011 requires that development *“optimise thermal performance, thermal comfort and daylighting will contribute to the energy efficiency of the building, provide increased amenity to occupants and reduce greenhouse emissions and, with them, the cost of supplying electricity.”* The proposed office tower can be designed to reduce the extent of mechanical cooling and heating required and minimise energy consumption and greenhouse gas emission.

DCP 2011 requires that non-residential buildings include water saving devices (at least 3 Star Water Efficiency), reduce reliance on artificial lighting, comply with BCA energy efficiency provisions and achieve at least 4 stars under the Australian Building Greenhouse Rating Scheme or equivalent. The proposed building can be designed to achieve or exceed these requirements.

6.10 Developer Contributions

Provide the scope of developer contributions proposed.

The Parramatta City Centre Section 94A Contributions Plan (now Section 7.12) applies to the central business district (CBD) of Parramatta, including the subject land. This S7.12 Plan prescribes that a monetary contribution equivalent to 3% of the project development cost be paid as a developer contribution to Council, prior to the issue of a Construction Certificate (CC).

Based on an assessed total Capital Investment Value of \$492 million for the office tower, as proposed to be modified, a S7.12 levy of almost \$15 million is payable to Parramatta City Council, prior to release of the CC for the office tower. This is more than double the amount payable for the office tower in its currently approved form and provides significant funding to Council for public domain improvements and provision of additional community, recreational and cultural facilities and services in the Parramatta CBD.

In addition to the S7.12 levy, the proponent offers to enter into a Voluntary Planning Agreement (VPA) providing for a cash contribution to Council of \$500,000 for public domain improvements proposed by Council n Church Street, extending south from Parramatta Square to Campbell Street. This VPA would be prepared and entered into as part of the DA for the future office tower and is included in the Statement of Commitments for the modification application.

6.11 Utilities

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

The proponent has undertaken consultation with relevant service authorities. Copies of preliminary responses from service authorities are attached at **Appendix I** and **X**. A utilities and services report has been prepared addressing utility and service requirements for the future office tower. A copy of this Report is attached at **Appendix F**.

All necessary urban services are available to the site and either have adequate capacity to accommodate the proposed development, or can be readily upgraded. A suitable consent condition can be imposed in any future DA for the office tower requiring connection of services to the site in accordance with service authority requirements. The following is a summary of necessary utilities and services.

Water and Sewerage

Reticulated sewerage service is provided to the site nearby in Marsden Street by Sydney Water. A 225mm diameter sewer extension can be provided from Marsden Street to the proposed office tower. A reticulated water service is provided to the front of site in Argyle Street by Sydney Water. Water services can be connected to the planned tower from Argyle Street.

The proponent has undertaken preliminary consultation with Sydney Water regarding the proposed development. Sydney Water has not identified any water or sewerage service constraints that would prevent the development from proceeding. Water and sewer levies will be payable to Sydney Water at Construction Certificate stage for augmentation of water and sewer infrastructure. A Section 73 Notice of requirements will be lodged with Sydney Water in relation to water and sewerage infrastructure, once development consent has been issued.

Electricity Capacity and Supply

The existing shopping centre is serviced by 9 substations (all owned by Endeavour Energy), which are located within the shopping centre. The proposed office tower will require an additional substation, which can readily be accommodated in the ground floor car park, in a location accessible to the office tower.

Endeavour Energy have advised that the new electrical demand from the proposed office tower would be met by supply from the West Parramatta Zone Substation. Arrangements for electricity supply will be undertaken in consultation with Endeavour Energy as part of the preparation of the construction plans for the proposed office tower.

Gas Supply

Gas service is provided to the existing shopping centre by several connections from the Jemena Gas Network in the streets adjacent to the Westfield site. Gas services for proposed office tower can be supplied by providing a new connection to the existing 7kPa gas main located in the footpath in Argyle Street. Arrangements will be made with Jemena for connection of gas supply for future office tower prior to issue of Construction Certificate.

Telecommunications and NBN

Telecommunication services are provided to the existing shopping centre by means of copper and fibre optic lines from Telstra's network in adjacent streets. The proposed office tower will be serviced by NBNCo via their broadband fibre optic network. Arrangements will be made for connection of telecommunications services to the site with the relevant service providers prior to issue of Construction Certificate.

Hydraulic Services

The proposed office tower will not result in any increased stormwater runoff from the site. The Project Approval for the retail additions requires provision for on-site stormwater re-use. Stormwater runoff from the site of the office tower will be collected and directed into the existing Westfield stormwater drainage system, then discharged into Council's drainage system in Argyle Street.

Waste Management

The proposal is for a building envelope only. A Waste Management Plan (WMP) for the office tower would be prepared as part of a future DA. Waste management for the proposed office tower, as modified will be by way of an additional waste storage facility to be provided off the Marsden Street (east side) loading docks, providing space for waste storage, recycling and waste collection. Demolition materials will be recycled where possible.

6.12 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.

As part of the preparation of Secretary's Requirements for the project, the Secretary has undertaken initial consultation with Roads and Maritime Services, Transport for NSW) and the NSW Department of Transport and the Environment Protection Authority. Copies of responses from those authorities are attached at **Appendix X**. The Secretary also consulted with Parramatta Council, however, the Council's response was not received before the issue of final SEAR's. Subsequently, Council's response was received in December 2017 and a copy of this response is attached at **Appendix W**.

In accordance with the above requirements, the proponent commissioned Elton Consulting to undertake Community Consultation as part of the preparation of the Environmental Assessment for the proposed modification. A copy of Elton Consulting Community Consultation Report, including a copy of the information flyer and display panels is attached at **Appendix M**. This Report also and summarises key points raised during the community consultation and the proponent's response to the points raised.

Community consultation occurred for a period of 3 weeks from 11/4/18 to 4/5/18 and comprised a display of the plans in a prominent location within the Westfield Shopping Centre, preceded by an information flyer distributed to local residents and businesses in the locality. 3 “pop-up” consultation sessions were held on 12th, 13th and 14th April by personnel from Elton Consulting.

The overwhelming majority of responses were positive to the proposed modification and supported the need for more good quality environmentally friendly office space in Parramatta. Increased height in the CBD was considered to be a better option than taking up more land. Improvements to the Argyle Street façade were seen as a very positive outcome and would improve the public domain of Argyle Street.

Some concerns were raised with regard to the extent of traffic congestion in the area, difficulties accessing car parking, potential overshadowing, hazards such as fire and earthquake and the need for improved disability access. These matters are addressed in the Environmental Assessment of the proposed modification. Limiting the extent of additional car parking in combination with planned improvements to public transport assist in mitigating congestion. Reasonable solar access is maintained to neighbouring properties and there is no reduction in solar access to the public domain. The building will be designed in accordance with the relevant building standards relating to hazards such as fire and earthquake.

Copies of the draft plans were provided to Roads and Maritime Services (RMS), Transport for NSW, The Office of Environment and Heritage, Sydney Water, Sydney Trains, Civil Aviation Safety Authority and Air Services Australia. Consultation with RMS also included a meeting at the RMS office in Parramatta. Most of these agencies have responded and no major issues were raised in responses. Copies of the response received are attached at **Appendix I**. A written response has not yet been received from the RMS.

The proponent has consulted with Parramatta Council during preparation of the Environmental Assessment. This consultation included the proponent’s written response to the issues raised by the Council in its December 2017 correspondence providing comments to the Secretary in relation to the Secretary’s Draft SEAR’s. The proponent had a follow up meeting with Council in April 2018 to discuss the proposed modification and issues raised by Council. The Council’s comments on the proposal and the proponent’s response are detailed in Section 7 of the EA Report.

The Environmental Assessment (EA) and supporting material, once approved for lodgement by NSW Planning and Environment (NSW Planning), will then be publicly exhibited and adjoining and nearby land owners notified of the proposal in accordance with the requirements of the NSW Planning. The EA Report and supporting material, including plans, will be displayed at the offices of Council and NSW Planning, and at Westfield Parramatta Shopping Centre. This will provide a opportunity for further consultation and input from the local community, landowners and other interested persons including businesses, organisations and those working in the area.

6.13 Statement of Commitments

The EA must include a draft Statement of Commitments detailing measures for environmental management, impact mitigation and ongoing monitoring of the project.

The following table identifies the relevant environmental management issues, the Proponent's commitment, the Approval Authority (where applicable) and the timing of the commitment. Matters addressed include compliance with the BCA and Australian Standards, demolition and excavation works, construction management including pedestrian, vehicular access and car parking during construction, accessibility compliance (BCA, Australian Standards and Disability Discrimination Act), ESD commitments, developer contributions, utilities, safety and security, public domain improvements, architectural design competition etc.

DRAFT STATEMENT OF COMMITMENTS FOR THE PROPOSED OFFICE TOWER

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 office tower 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 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.	PCA	Prior to issue of office tower Construction Certificate
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 office tower 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 (as per a CMP)..	Council	During Construction
Access to car parking during construction	The DA 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 office tower Construction Certificate
Public domain works	A public domain improvements plan will be prepared in consultation with Parramatta City Council for public	Council	A Public Domain Improvement Plan will be prepared,, finalised

ISSUE	COMMITMENT	APPROVAL AUTHORITY	TIMING
	domain improvements. Timing of construction of public domain improvements will be negotiated with Council.		and approved, prior to DA consent for the office tower. 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 DA consent for the office tower.
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 for DA..	Council	Prior to submission of the DA
S7.12 Developer Contributions	The proponent undertakes to pay the S7.12 Developer Contribution (currently 3% of project value) to Council for the office tower., payable with each respective stage of the development.	Council	Contribution for the office tower paid prior to issue of the Construction Certificate for the office tower.
Voluntary Planning Agreement	The proponent undertakes to enter into a Voluntary Planning Agreement (VPA) with Council, providing for payment of a cash contribution of \$500,000 for planned public domain improvements to Church Street, extending south from Parramatta Square to Campbell Street.	Council	Prior to issue of DA consent with the contribution paid prior to issue of the Construction Certificate for the office tower.
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 the office tower.
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 Rogers & Kafes Pty Ltd, dated October 2012	Council & Roads & Maritime Services	Prior to occupation of the Level 6 retail additions approved under the 2014 Project Approval for the site. .
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 and a copy attached at Appendix O . Construction will be undertaken in accordance with the final approved versions of these plans.	PCA	Prior to issue of Construction Certificate for the office tower and during construction for work activity on the site.
Ecologically Sustainable Development	The proposed office tower development will achieve a 5 Green Star Office design rating. Prior to issue of the Construction Certificate for office tower, an ESD	PCA	Prior to issue of the Construction Certificate for the office tower.

ISSUE	COMMITMENT	APPROVAL AUTHORITY	TIMING
	strategy will be provided outlining ESD measures to be incorporated into the building.		

7. PARRAMATTA CITY COUNCIL RESPONSE TO DRAFT SEAR'S

Parramatta City Council provided a response to Draft SEAR's in December 2017, which was received by NSW Planning after the issue of final SEAR's by NSW Planning. Council has raised a number of issues that have not been included in the SEAR's requirements, or specifically addressed elsewhere in this EA Report. A copy of Council's response to Draft SEAR's is attached at **Appendix W**.

The matters raised by Council in its correspondence of December 2017 are identified and addressed in the following assessment.

1. *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.*

Scentre Group has no proposals for future development of the Westfield Parramatta shopping centre site, apart from generally minor internal changes from time to time and the proposed office tower and the additional retail level and parking, for which both Concept Approval and Project Approval has been issued. In these circumstances, a master plan would be inappropriate where no other future works are envisaged or likely.

It might be possible in the longer term to construct a second office tower, to the west of the proposed office tower. A plan is included with the modified Concept Plans, showing the potential location and building envelope for a possible additional future office tower to the west. This should not be read as implying that there has been any firm intention or decision by Scentre Group to proceed with development of an additional office tower.

2. *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.*

The proposed location of the office tower, further west of the currently approved tower location does not terminate the view corridor of Church Street, but rather is located to the west of the view corridor termination point, due to the angling of Church Street to the southeast, between Macquarie Street and Parramatta Road. The currently approved office tower location is closer to the view corridor termination point of Church Street.

Following detailed structural investigations of the existing 5 level retail podium on the southwest corner of Church and Argyle Streets, it has been determined that an office tower in the currently approved location would require demolition of the existing retail podium in this location and construction of a new podium. The cost of undertaking such works cannot be recouped from leasing returns from the office tower and would require a large number of retail/commercial tenants to have their leases terminated.

There is an opportunity to reconfigure the existing Department store within the shopping centre to accommodate an office tower above this tenancy. This work can be undertaken without the need to remove Department store's store from the shopping centre and the existing structure in this location can be modified without the need for wholesale demolition.

Council has imposed a 36m building height limit along the Church Street frontage of the site, adjacent to the intersection with Argyle Street. Any future tower in this location would have to be setback to the west behind the 36m building height limit area. As noted above, it is not feasible to construct a high-rise office tower above the existing retail podium in this location.

The issue of future redevelopment of the Westfield Parramatta shopping centre is addressed in response to Council's Issue 1 relating to Council's request for a master plan. As noted in our response to Issue 1, there is potential in the longer term for a second office tower to be developed to the west of the proposed office tower.

A narrow tower form has been adopted to minimise overshadowing to the south, provide optimum internal access to natural light and ensure the office floorplate is compatible with the existing retail podium below, to facilitate construction of the tower.

The optimal location of the of the core is centrally along the western elevation of the tower. In developing the proposed building envelope, consideration has been given to how the western side of the core can be addressed, to avoid creation of a large expanse of blank wall. Appropriate solutions will be further explored during the design excellence process that occurs when building designs are prepared for the Project Application.

3. 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.*

A Project Approval has been issued for an additional retail level. The tower building envelope makes provision for a 1 or 2 storey podium to the office tower so that a suitable connection can be provided to the proposed additional retail level. The initial tower envelope plan lodged with the request for SEAR's included a 2 storey tower podium with larger floorplates than the tower element. Podium floor plates now match the size of those in the tower above.

Concept Plans have now been included with the proposal showing an alternative 2 storey podium design which provides for a 2 storey height partially open podium space on the existing retail roof, below the office tower providing for connectivity to the approved additional retail level.

The Concept Plans have been further developed to show how the existing roof top area above the retail podium and below the office tower element, can be activated to include not only retail tenancies, but also a series of landscaped spaces and articulated pavilions varying in size, scale and form, creating a new elevated public space on top of the existing retail podium.

As noted in our response to Issue 2, it is not possible to construct a high-rise tower with an adequate floorplate above the existing retail podium, at the southwest corner of Church Street and Argyle Street.

4. 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.*

The tower floor plate size of 3,025m² has been developed having regard to the needs of major national and international businesses. A commercial analysis justifying floor plate size will be included with the documentation to be included with the Environmental Assessment Report. The design of the proposed tower will also be tested through the design excellence process as part of the preparation of plans for the Project Application.

The narrow tower floorplate in east-west elevation will optimise access of building occupants to natural light. The objective of locating occupants within 12m of natural light sources will be an important objective of the tower design process, as the building will be designed to achieve an A Grade commercial office standard.

5. 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 building setbacks exceeding 6m are provided to street frontages to the east, south and west. A 3m tower setback is proposed to Argyle Street to align with the existing front wall of the Department store and is setback behind the existing colonnade in Argyle Street. This provides an appropriate street wall definition, both as viewed from street level and from higher vantage points.

The existing colonnade extends 3m south from the street frontage of the site to the northern wall of the Department store and provides for acceptable wind conditions for pedestrian comfort and safety at ground level (see Wind Assessment Report attached at **Appendix O**). The colonnade can be supplemented by a suitably designed awnings extending out from the tower above the existing retail podium. above the Argyle Street footpath to further mitigate wind impacts. A detailed wind impact assessment will be undertaken as part of the preparation of tower design plans for the Development Application.

6. 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.*

A tower building separation distance of more than 24m is provided to all elevations of the proposed office tower. As outlined in discussion of Council's Issue 1, there is potential for a second office tower to be developed to the west of the proposed office tower. A second office tower can be provided to the west with a separation distance of 24m and appropriate setbacks to Argyle Street and Marsden Street and still achieve a generous east-west tower width.

The proponent acknowledges Council's support for delivery of future commercial floor space and associated jobs in the city centre and concurs with Council's position on this issue. In opting for a commercial, rather than residential tower, the proposal is closely aligned with the objective of providing more commercial floor space and employment opportunities in the Parramatta City Centre.

The proposed tower location is highly accessible to both Parramatta Railway Station and existing new and planned commercial buildings in the nearby Parramatta Square.

The proposal augments these developments in Parramatta Square and contributes towards the creation of a prestige office precinct in this location. Large floorplate office towers are essential for attracting major corporations to Parramatta.

7. *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.*

The tower envelope plans include concept plans for the ground floor level and its interface to Argyle Street and integration with existing retained floor space at ground level around the proposed ground floor tower lobby. The concept plans minimise lobby width at ground floor level and also includes retail/café tenancies on the ground floor level, fronting Argyle Street, either side of the tower lobby entry.

8. *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.*

The proposal includes substantial public domain improvements and at this stage the proponent considers it feasible to address most of Council's recommendations, in whole or in part. Public domain works proposed by the proponent include the following:

- Provision of a raised threshold paving to the intersection of Church Street and Argyle Street to provide a more pedestrian friendly environment and encourage reduced speeds for vehicular traffic.
- A contribution of \$500,000 (by way of a Voluntary Planning Agreement) towards Council's proposed upgrading of the Church Street railway underpass to enhance visual continuity and pedestrian connectivity and safety, including public art and planned future upgrading and widening of footpaths in Church Street, south of the railway bridge.
- Upgrade the intersection of Aird Street and Church Street to provide for a more pedestrian friendly crossing environment.
- Provision of street trees, where necessary and additional street furniture within footpath interfacing the Westfield site, in consultation with Council.
- Provision of more accessible and upgraded public spaces along the Argyle Street frontage, generally as recommended by Council and including street trees and street furniture and paving repairs where required.
- Provide a more active street frontage to Argyle Street and Church Street, extending from the pedestrian overbridge in Church Street to the western side of the proposed office tower envelope in Argyle Street.

Council has requested additional public domain improvements including intersection changes at the intersection of Church Street and Argyle Street, footpath widening to Church and Argyle Streets and road narrowing and footpath widening along the southern side of the Campbell Street frontage of Westfield Parramatta.

While the proponent acknowledges that many of Council's proposed public domain improvements are desirable, the extent of such works must be reasonable and proportionate to the proposed development and recognise that the proponent will be required to pay significant S7.12 levies to the Council.

Council levies S7.12 developer contributions on development in the Parramatta, which are designed to fund new and upgraded CBD infrastructure and facilities, including improvements to the public domain. It is unreasonable for all the public domain improvements identified by Council in its response to SEAR's to be funded from a single development.

We are not aware of any other development in the Parramatta CBD that has been required to undertake public domain improvements to anywhere near the extent envisaged by Council for the proposed office tower at Westfield Parramatta.

It is appropriate that the substantial S7.12 levies payable by the proponent, which will exceed \$14.7 million, should, at least in part, be allocated to the additional public domain improvements Council is proposing for the locality.

9. *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 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.

The proposed tower envelope has been designed to ensure there is no material mid-winter overshadowing of Jubilee Park between the hours of 12 noon to 2pm. The Environmental Assessment will include consideration of airspace issues.

Street activation plans will be included with the building envelope plans for the proposed office tower. Detailed plans of proposed street activation will form part of the Project Application plans, to be prepared for the development application, upon completion of the design excellence process.

As noted above, detailed design of the proposed office tower will include a design excellence process. The final design of the tower building will make provision for end of journey facilities, energy and water use efficiency and dual water systems. A flood risk assessment and stormwater management plan will be prepared for the development application.

The proponent is aware of proposed new planning controls for the Parramatta CBD and concurs with Council's opinion that the proposed commercial tower is consistent with the proposed planning controls in relation to land use. Section 6.1 of the Environmental Assessment Report assesses the proposal against the primary planning controls proposed in the Draft LEP.

The proponent met with representatives of Parramatta Council in April 2018 to outline the proposal and discuss the issues raised by Council in its December 2017 correspondence.

The Council has requested that the visual and heritage impact assessments include an assessment of the potential visual and heritage impacts of the proposed tower in the background of the existing view corridor looking south from the Church Street Mall directly to the south towards and over the Cathedral. This view corridor has been included in the visual and heritage impact assessments, which demonstrate that the setting and heritage qualities of the Cathedral are not materially compromised.

Council indicated a preference for a 6m setback to Argyle Street, but also acknowledged that the existing 3m colonnade fronting the site in Argyle Street would likely prevent adverse wind impacts at ground level. This is confirmed in the wind assessment report attached at **Appendix O**. The proposal is for an envelope only and it is not obligatory for the future tower design to adopt the minimum setback of the envelope. The design excellence process is the appropriate means of determining final architectural presentation and setbacks of the tower to Argyle Street.

Council advised that the rail bridge over Church Street already has 2 pieces of public art below the bridge and suggested the option of additional public art in the form of lighting. As part of the preparation of the DA for the office tower, the proponent will consult further with Council regarding upgrading and public art under the railway bridge.

Council indicated support for the concept of an activated open terrace on the existing retail podium roof below the proposed tower envelope and recommended that a generous area of landscaping and public space be provided on the roof terrace. The concept design for the roof terrace includes substantial areas of landscaping and public space.

8. CONCLUSIONS

The subject land is strategically located within the Parramatta CBD, close to the Parramatta Railway Station and Transport Interchange and the Parramatta Square redevelopment area. The site is large in size, readily 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 office employment activity.

The proposed A Grade high rise commercial tower building envelope, as proposed to be modified, with increased tower height and generously sized floor plates, designed to achieve a 5 Green Star sustainability rating, will address the current undersupply of A Grade office space suitable for major tenants in the Parramatta CBD.

It is not possible to implement the Concept Approval for the office tower, as originally approved. The building envelope as originally approved has insufficient floor space and floor plate sizes are totally inadequate to meet the needs of major commercial tenants in the 21st century. Parramatta Council has recently acknowledged the need to provide for large floor plate office towers, by removing its previous DCP restriction placing a limit on office floor plate size.

Due to structural and other constraints, it is not feasible to construct a taller larger tower in the location currently approved for the office tower envelope. Relocating the tower envelope a short distance to the west, retains accessibility to public transport and the primary commercial core area of the Parramatta CBD. Construction is feasible in this location, as the existing Department Store can be reconfigured and reduced in floor area to accommodate structural support columns, vertical transport and lobby facilities.

The future office tower will be of a contemporary design, developed through a design competition and will include a roof terrace, an enhanced retail facade to Argyle Street, an active frontage at ground level to Argyle Street and enhanced public domain. The proposal, as modified responds to the site's context and Council's adopted strategy to encourage higher density taller buildings in the Parramatta CBD and new A Grade office space.

The building envelope, as modified, will have an acceptable visual impact within the emerging high-rise skyline of the Parramatta CBD and will maintain reasonable neighbour amenity, having regard to the high-density context of the site. There are no material impacts on the heritage values, setting or views to or from heritage items in the locality, including the primary view corridors, identified in PDCP 2011. .

The development is consistent with the planning and development objectives for the locality and makes a significant positive contribution to Parramatta's role as the primary employment centre for western Sydney. The proposal is consistent with Parramatta Council's planning strategy for the CBD, which aims to include the Westfield Shopping Centre site within the B3 Commercial Core zone and remove existing maximum height limits over most of the site, including the location of the proposed office tower building envelope.

Traffic impact assessment indicates that the proposed building envelope will have minimal, if any impact on the surrounding road network, compared to the building envelope, as originally improved. While there is a substantial increase in office floor space, office off-street parking will remain at 100 car spaces, which not only ensures no increase in commuter car travel, but also creates increased patronage of public 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 to the south will receive at least 3 hours mid-winter solar access. West facing apartments to the southeast will, for the most part, continue receive at least 2 hours mid-winter solar access. View impacts are modest and acceptable, having regard to the high-rise CBD location of the site.

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 close to a major public transport interchange and within walking or cycling distance of medium and high-density housing.

The alternative to not proceeding with the proposed development, as modified, would result in no office tower being constructed at the Westfield Shopping Centre, ongoing shortage of prime A Grade office space in the Parramatta CBD and continuing underutilisation of a large site strategically located within the CBD, close to Parramatta Square and Parramatta Transport Interchange.

Having regard to the planning objectives for the area, the context of the site, including its constraints and opportunities, and the need for high quality large floor plate office towers in Parramatta, to meet currently unsatisfied demand, it is considered that the proposed tower envelope, as modified, provides for a desirable future 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 that the requested office tower building envelope modification has minimal environmental impact beyond that resulting from the building envelope, as originally approved. Accordingly, the modification, as submitted under S75W is worthy of approval.