



**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 (REVISED)**



**Prepared for  
Scentre Group  
By  
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Job No. 17124**

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## EXECUTIVE SUMMARY

This revised 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 20<sup>th</sup> February 2014 for additions to the shopping centre, incorporating the following works:

- 31,495m<sup>2</sup> (GFA) of retail additions and associated internal modifications;
- Building envelope for commercial tower above retail podium incorporating up to 35,000m<sup>2</sup> (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), as originally proposed and exhibited, sought approval for the following changes to the office tower envelope, as currently approved:

- Increase total assessable commercial gross floor area (GFA) from 35,000m<sup>2</sup> to 112,000m<sup>2</sup>;
- 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 1,800m<sup>2</sup> to 3,025m<sup>2</sup> for the 39 office tower floor levels above the office tower podium.
- Relocate the building envelope further to the west to provide an office tower setback of 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.

Following completion of exhibition of MOD 1 on 2<sup>nd</sup> October 2018, in the form as outlined above, the NSW Department of Planning Industry & Environment (DPI&E) in correspondence dated 29th October 2018 advised the proponent that DPI&E was not satisfied with the proposal, as exhibited. DPI&E advised that further consideration is required to be given to built form, heritage, pedestrian and transport impacts and recommended that further consultation should be undertaken with Parramatta City Council and Transport for NSW (TfNSW).

The submissions to the 2018 exhibition of the original modification raised concerns with respect to issues such as the location of the tower envelope within the heritage view corridor to St Johns Cathedral, need to consider alternative locations, bulk and scale, design excellence process, impacts on pedestrian flows in Argyle Street and sustainability. Following detailed consideration of submissions (copies attached at **Appendix Z1**) and further consultation with DPI&E, Parramatta City Council, TfNSW, the Government Architect's Office and the Office of Environment and Heritage, revised office tower envelope plans, including relocation of the tower envelope further west, have been prepared to address the key issues raised by DPI&E.

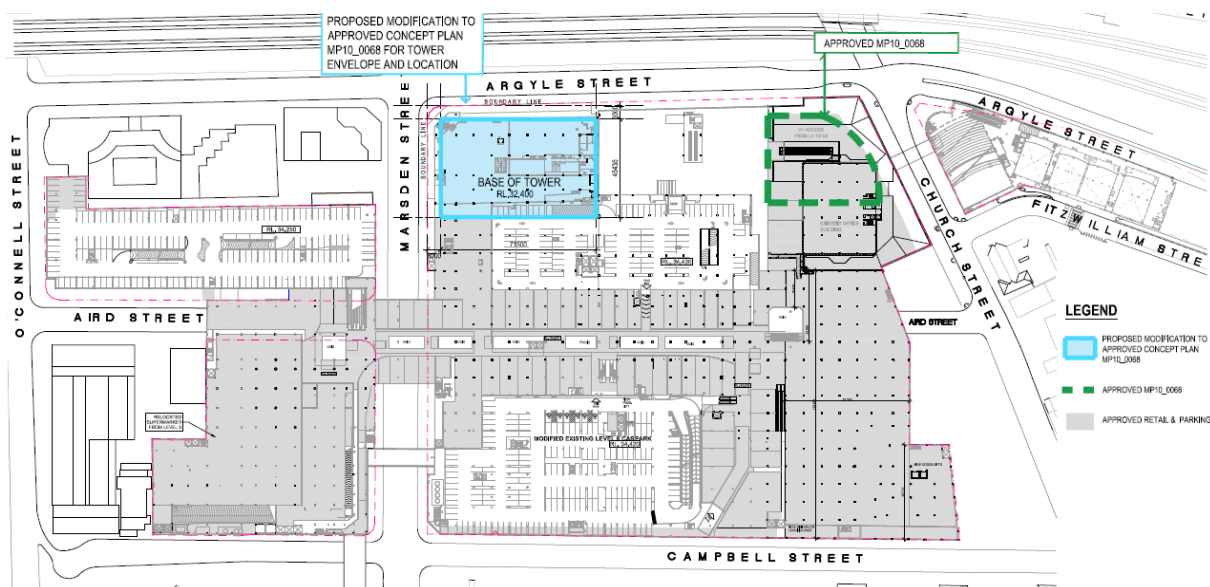
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Two options for relocating the tower envelope further west were considered. These included a north-south orientation with the long elevation of the tower fronting Marsden Street and an east-west orientation with the long elevation fronting Argyle Street. The second option was selected on the basis that it offered maximum activation to Argyle Street, optimised northerly aspect, integrated best with the existing retail podium and would align with future office towers along Church Street (western side), to the north of Macquarie Street. .

The revised commercial tower envelope plans provide for relocation of the tower building envelope some 42m further to the west, to the southeast corner of Argyle Street and Marsden Street, inclusion of basement parking, a reduction in gross floor area (GFA) from 112,000m<sup>2</sup> to 105,000m<sup>2</sup>, with GFA limited to a maximum of 70% of the building envelope. The net increase in car parking spaces has been reduced by 20 car spaces, from 562 to 542 car spaces.

**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 revised location of the proposed tower envelope, as modified, further to the west, above the David Jones Department Store. The grey shading shows the location of the proposed Level 6 retail that has been issued with Project Approval.

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



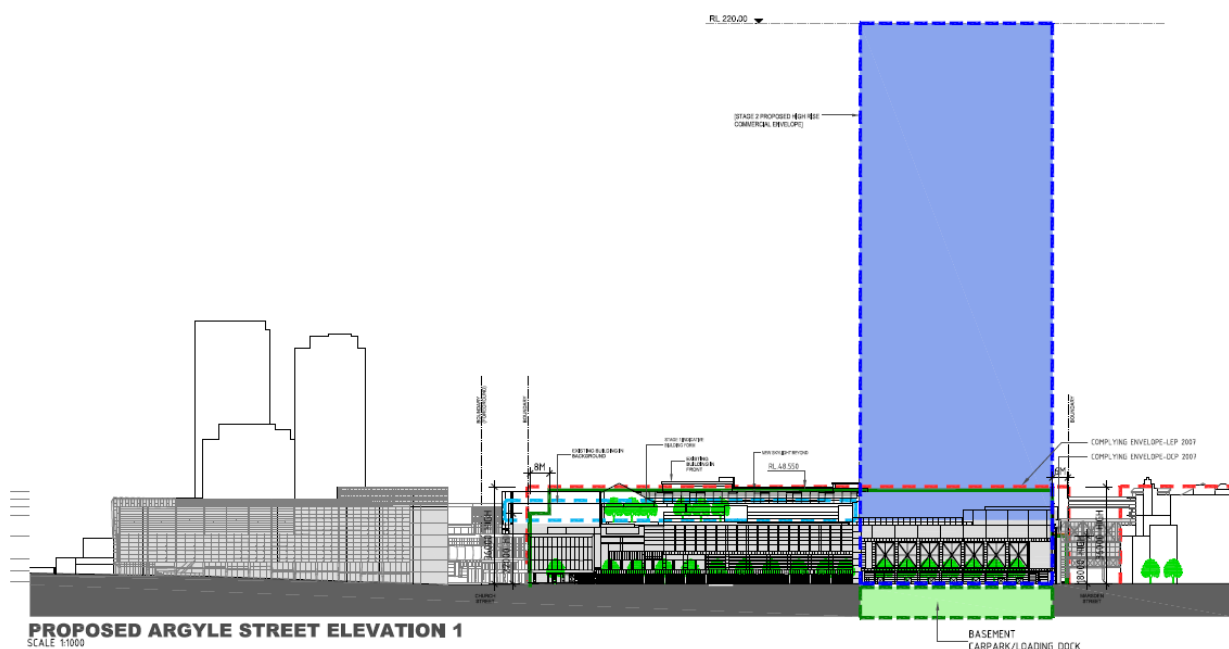
The future commercial office tower planned to be developed within the proposed building envelope, as modified, at the southeast corner of Argyle Street and Marsden Street will be designed as a prestige A Grade landmark 5 GreenStar office tower capable of attracting major private and government tenants 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 35,000m<sup>2</sup>, than is allowed for in the current Concept Plan Approval.

The Concept Plan Approval provides for a 20 storey office tower envelope with floor plates of up to 1,600m<sup>2</sup> 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 in the originally approved location. 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 David Jones Department Store, to provide for a taller office tower with larger rectangular floor plates. These works include reconfiguration of the various floor levels of this Department Store, provision of a ground floor level office tower lobby to Argyle Street and Marsden Street, activated street frontages comprising retail/café uses, and on the roof of the existing retail podium, potential for new café/retail floor space connecting the base of the tower to the approved additional retail level.

**Figure 2**, below shows an elevation view from Argyle Street, looking south, of the modified office tower envelope in the revised location proposed further to the west, at the southeast corner of Argyle Street and Marsden Street.

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



No changes are proposed to the Concept Plan Approval for the additional retail level. 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.

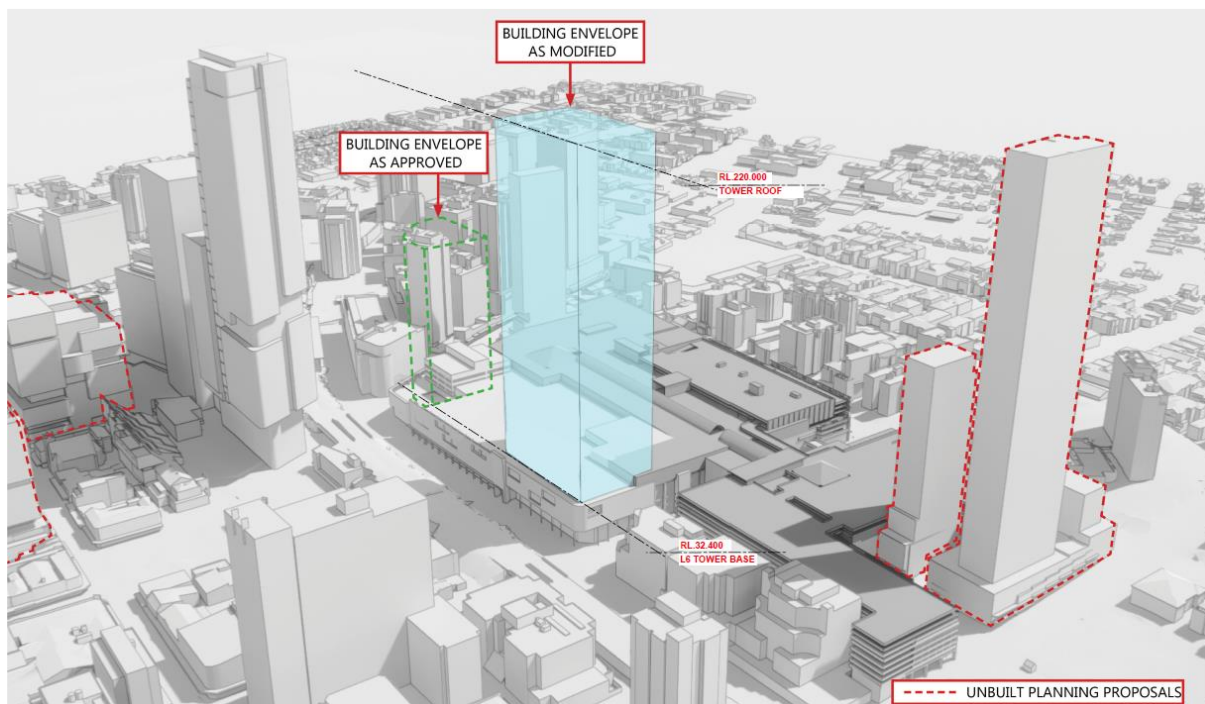


The office tower development includes street activation to Argyle and Marsden Streets, enhanced public domain to these streets, public art, provision of a raised paved threshold to the intersection of Argyle and Church Streets, improved pedestrian connectivity to Parramatta Square and payment of developer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

Relocation of the office tower envelope further to the west not only ensures that the future tower is located outside the heritage view corridor south along Church Street towards St Johns Cathedral but also provides a corner location for the tower and better integrates the tower into the Parramatta CBD street grid.

**Figure 3**, below shows a 3D view of the tower envelope in its revised location at the southeast corner of Argyle street and Marsden Street. Proposed future towers nearby are shown with red dashed lines.

**Figure 3 – 3D View of the Modified Office Tower Envelope**



The proposed office tower, as modified, will assist in addressing the current undersupply of A Grade large floorplate office floor space in Parramatta, contribute to employment growth within the Parramatta CBD, increase patronage of public transport, enhance the southern precinct of 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 revised Environmental Assessment suitably addresses the assessment criteria prescribed in the NSW Planning and Environment Secretary's Environmental Assessment Requirements (SEAR's) issued on 29<sup>th</sup> September 2017 for the requested modification. These assessment criteria (copy attached at **Appendix X**) continue to apply to the Modification Application, as revised. The revised Environmental Assessment also addresses the issues raised following exhibition of the original Modification Application in September/October 2018 and the Key Issues notified to the proponent by DPI&E shortly thereafter (see **Appendix Y**).

The revised Environmental Assessment demonstrates that the proposed office tower envelope, as modified and relocated further to the west, 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 amenity of the locality and also preserves the heritage view corridor to St Johns Cathedral.

The revised 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 and its subsequent exhibition. 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 revised 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 October 2020.

Nick Juradowitch  
Director  
Ingham Planning Pty Ltd



## 1. INTRODUCTION

### 1.1 – The proposed modification and revised tower envelope

This revised Environmental Assessment Report is provided in support of a revised 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 31,495m<sup>2</sup> GFA, a building envelope for a commercial tower up to 35,000m<sup>2</sup> GFA, parking for 542 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 20<sup>th</sup> February 2014.

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

- Increase total assessable commercial gross floor area (GFA) from 35,000m<sup>2</sup> to 112,000m<sup>2</sup>;
- 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 1,800m<sup>2</sup> to 3,025m<sup>2</sup> for the 39 office tower floor levels above the office tower podium.
- Relocate the building envelope further to the west to provide an office tower setback of 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, explored opportunities in the marketplace to attract suitable international and national corporations to Parramatta, to occupy the planned 35,000m<sup>2</sup> office tower. Feedback from this process indicates that major prospective tenants require larger floor plates and total floor space far in excess of 35,000m<sup>2</sup>, allowed for in the current Concept Plan Approval. It has not been possible to elicit any major tenant interest in the marketplace 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 2,000m<sup>2</sup> and 2,500m<sup>2</sup>. By way of example, the development under construction by the Walker Corporation for a 56 storey office tower on sites 6 and 8, Parramatta Square, comprises commercial GFA of more than 130,000m<sup>2</sup>. Half this floor space accommodated within “campus” floor plates of 3,000m<sup>2</sup> and the balance of office space within a “tower” floor plate of 2,400m<sup>2</sup>.

The Concept Plan Approval provides for a 20 storey office tower envelope with floor plates of up to 1,600m<sup>2</sup> 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 Myers 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. An alternative tower envelope location was therefore required.

Structural investigations indicated that it was feasible to locate a larger office tower envelope over the Myers Department Store, in a location that significantly increased setback to Church Street yet retained potential for an active frontage to Argyle Street. Consideration was given to the heritage view corridors to St Johns Cathedral and it was assumed that these view corridors were intended to extend to, rather than beyond the Cathedral. Modification 1 (MOD 1) was subsequently prepared and lodged, with a tower envelope extending to a height of RL 220 above a reconfigured Myers Department Store, with sufficient volume to accommodate a GFA of 112,000m<sup>2</sup>.

Following completion of exhibition of MOD 1 on 2<sup>nd</sup> October 2018, in the form as outlined above, the NSW Department of Planning Industry & Environment (DPI&E) in correspondence dated 29th October 2018 advised the proponent that DPI&E was not satisfied with the proposal, as exhibited. DPI&E advised that further consideration is required to be given to built form, heritage, pedestrian and transport impacts and recommended that further consultation should be undertaken with Parramatta City Council and Transport for NSW (TfNSW).

The submissions to the 2018 exhibition of the original modification raised concerns with respect to issues such as the location of the tower envelope within the heritage view corridor to St Johns Cathedral, need to consider alternative locations, bulk and scale, design excellence process, impacts on pedestrian flows in Argyle Street and sustainability. Following detailed consideration of submissions (copies attached at **Appendix Z1**) and further consultation with DPI&E, Parramatta City Council, TfNSW, the Government Architect's Office and the Office of Environment and Heritage, revised office tower envelope plans, including relocation of the tower envelope further west, have been prepared to address the key issues raised by DPI&E.

The proponent has investigated alternative locations for a larger tower envelope that can be accommodated outside the heritage view corridor to St Johns Cathedral, 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 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 or other solar access protected public spaces.

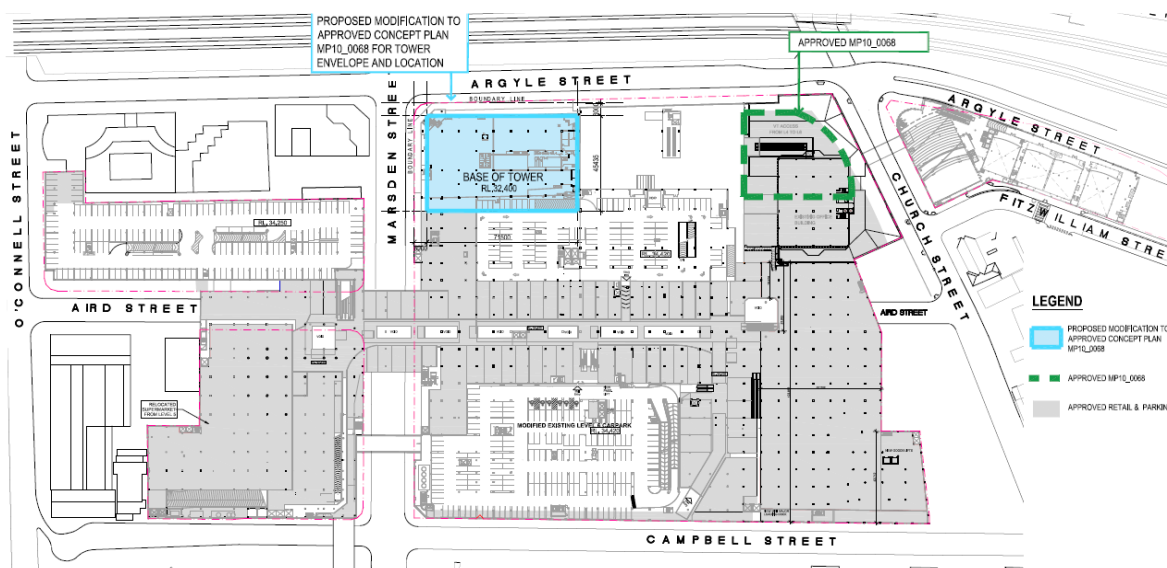
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Two options for relocating the tower envelope further west were considered. These included a north-south orientation with the long elevation of the tower fronting Marsden Street and an east-west orientation with the long elevation fronting Argyle Street, predominantly located above the footprint of the David Jones Department Store. The second option was selected on the basis that it offered maximum activation to Argyle Street, optimised northerly aspect, integrated best with the existing retail podium and would align with future office towers along Church Street (western side), to the north of Macquarie Street. .

The revised commercial tower envelope plans provide for relocation of the tower building envelope some 42m further to the west, to the southeast corner of Argyle Street and Marsden Street, inclusion of basement parking, a reduction in gross floor area (GFA) from 112,000m<sup>2</sup> to 105,000m<sup>2</sup>, with GFA limited to a maximum of 70% of the building envelope. The net increase in car parking spaces has been reduced by 20 car spaces, from 562 to 542 car spaces.

The area above the David Jones Department 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. 2 basement parking levels area proposed below the retail podium beneath the office tower.

**Figure 4 – Location Plan – Approved and Proposed Office Tower Envelope Locations**

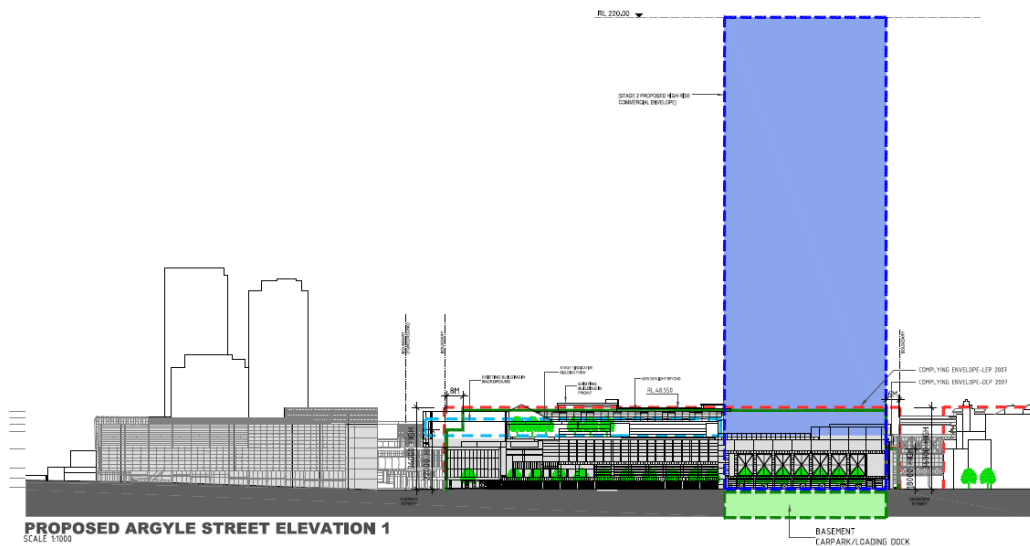


Relocating the office tower further west from Church Street ensures there is no encroachment into the southern vista down Church Street from Parramatta Square and provides more adequate building separation to the planned high-rise towers in Parramatta Square. An important heritage view corridor south from Church Street to and beyond the church is also 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 and retail use at ground floor level to Argyle and Marsden Streets activate these street frontages and facilitate creation of an active public domain in this somewhat underutilised section of Argyle and Marsden Streets, both of which currently offers little for pedestrian amenity or street life.

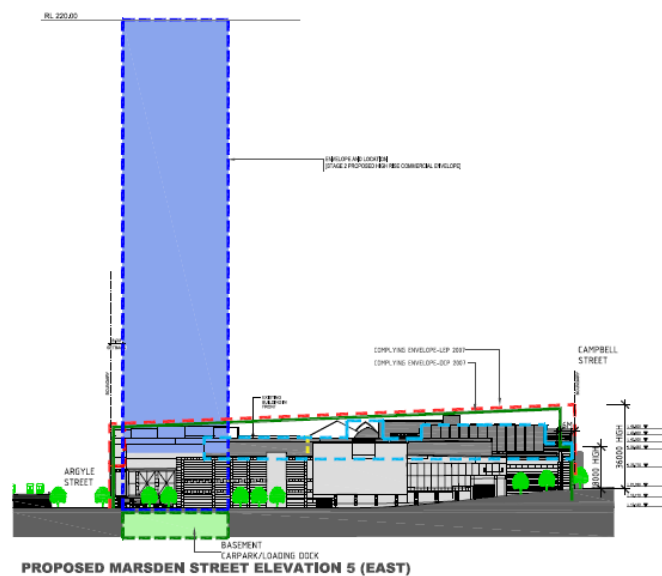
**Figure 5**, below shows a northern elevation view from Argyle Street, looking south, of the modified office tower envelope in the location proposed, some 42m further to the west of the current approved office tower envelope.

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



**Figure 6**, below shows a cross-section view from Marsden Street, looking east, of the modified office tower envelope in the location now proposed at the corner of Argyle and Marsden Streets.

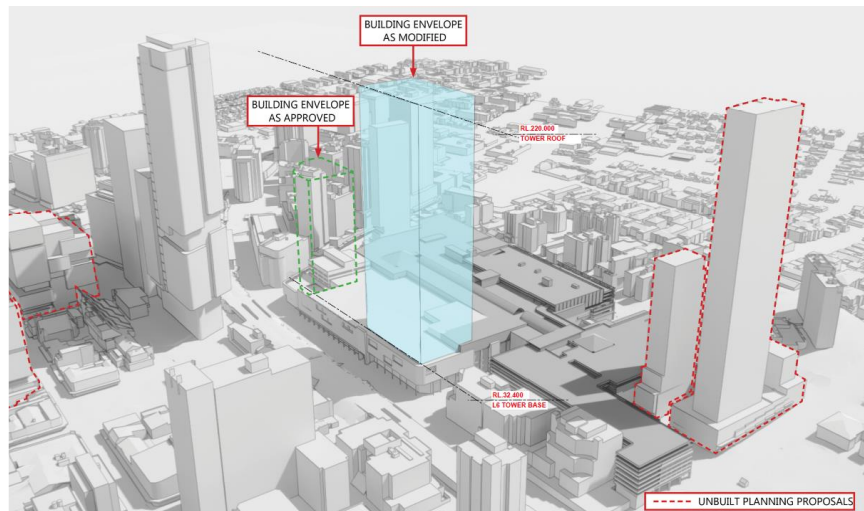
**Figure 6 – Marsden Street Elevation View of the Modified Office Tower Envelope**



The proposed commercial office tower will be designed as a prestige A Grade landmark 5 GreenStar office tower with larger floorplates capable of attracting major private and government tenants to Parramatta. Office tower lobbies will be provided at ground level, at the corner of Argyle and Marsden Street and at the podium level which forms the base of the tower. A 2 level basement will be provided below the existing podium providing 100 car spaces and bicycle parking and end of trip facilities for the proposed office tower

**Figure 7**, below, provides a 3D view of the tower building envelope, sitting above the retail podium. Proposed future towers nearby are shown with red dashed lines.

**Figure 7 – 3D View of the Modified Office Tower Envelope**



**Figure 8**, below is a CGI of how a future office tower could be designed to integrate with an upgraded retail podium at the corner of Argyle and Marsden Streets.

**Figure 8 – CGI View of the Reference Design Office Tower (Corner Argyle & Marsden Streets)**



No changes are proposed to the Concept Plan approval for the additional retail level. Due to the need to remove 120 car spaces above the David Jones Department Store there will be a net reduction of 20 car spaces from 562 additional car spaces to 542 car spaces. The number of car spaces for the office component will remain unchanged at 100 car spaces, as provided for in the Concept Plan, with those 100 car spaces now proposed separately in 2 new basement levels below the office tower envelope and retail podium, rather than within the retail parking area.

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Additional retail parking will reduce from 462 car spaces to 442 car spaces. Consequently, there will be a minor reduction in traffic generation compared to the existing Concept Plan Approval.

The office tower development includes street activation to Argyle and Marsden Streets, enhanced public domain to these 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 large floorplate office floor space in Parramatta, contribute to employment growth within the Parramatta CBD, increase patronage of public transport, enhance the southern precinct of 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 revised Environmental Assessment suitably addresses the assessment criteria prescribed in the NSW Planning and Environment Secretary's Environmental Assessment Requirements (SEAR's) issued on 29<sup>th</sup> September 2017 for the requested modification. These assessment criteria (copy attached at **Appendix X**) continue to apply to the Modification Application, as revised. The revised Environmental Assessment also addresses the issues raised following exhibition of the original Modification Application in September/October 2018 and the Key Issues notified to the proponent by DPI&E shortly thereafter (see **Appendix Y**).

The revised Environmental Assessment demonstrates that the proposed office tower envelope, as modified and relocated further to the west, 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 amenity of the locality and also preserves the heritage view corridor to St Johns Cathedral.

The revised 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 and its subsequent exhibition. 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 revised 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 October 2020.

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## 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 and Marsden 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 and Marsden Streets, 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 in the southern precinct of the Parramatta CBD and compatible with high-rise development planned for the nearby Parramatta Square Precinct and in locations near the site;
- 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, Church Street Mall and the new aquatic centre.
- Integrate the proposed office tower into the shopping centre retail podium and provide additional landscaped public space on the podium
- Provide an active street frontage to Argyle and Marsden Streets and introduce a new pedestrian entry at this corner and to the east in Argyle Street.
- Optimise energy efficiency and ecological sustainability, complying with Council’s DCP;

The subject land is a large strategic site within the Parramatta CBD, comprising a major portion of the CBD’s southern precinct. The site 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.

Section 4 provides a detailed description of the project including built form, floor space, vehicular and pedestrian access, parking and the public domain.

Section 5 outlines the Secretary's environmental assessment requirements 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; pre-submission and post-submission consultation, and a draft statement of commitments.

Section 7 provides details of and a response to Parramatta City Council's response to the Secretary's Draft SEAR's and the exhibition of the previous modified tower envelope.

Section 8 provides a conclusion.

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## 2. PROPONENT AND CONSULTANT TEAM

The Project Proponent is Scentre Group. The consultant team assisting 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

URBIS – Visual and View Impact Analysis

NBRS Architecture & Heritage – Heritage Impact Assessment

WINDTECH – Wind and Reflectivity

VIPAC – Acoustics and odour assessment

Elton Consulting – Community Consultation

MPN Group – Structural Engineer

Douglas Partners – Land Contamination Assessment

Westfield Design & Construction – Master planning, concept design, utilities and services

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### 3. SITE AND LOCALITY ANALYSIS

The subject land is in the southwest sector of the Parramatta CBD extending east from Marsden Street to Church Street and extending south from Argyle Street, adjacent to the Parramatta Railway Station and Transport Interchange. The Parramatta CBD is effectively Sydney's second CBD and is identified as the major centre for the Central River City within Metropolitan Sydney in the Sydney Metropolitan Strategy. The 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 the major centre for the Central River City in the Sydney Metropolitan Strategy 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 extends 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 165,000m<sup>2</sup> (GLA) of retail floor space and is the largest retail centre in western Sydney. Some 115,000m<sup>2</sup> (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 685,000m<sup>2</sup> 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

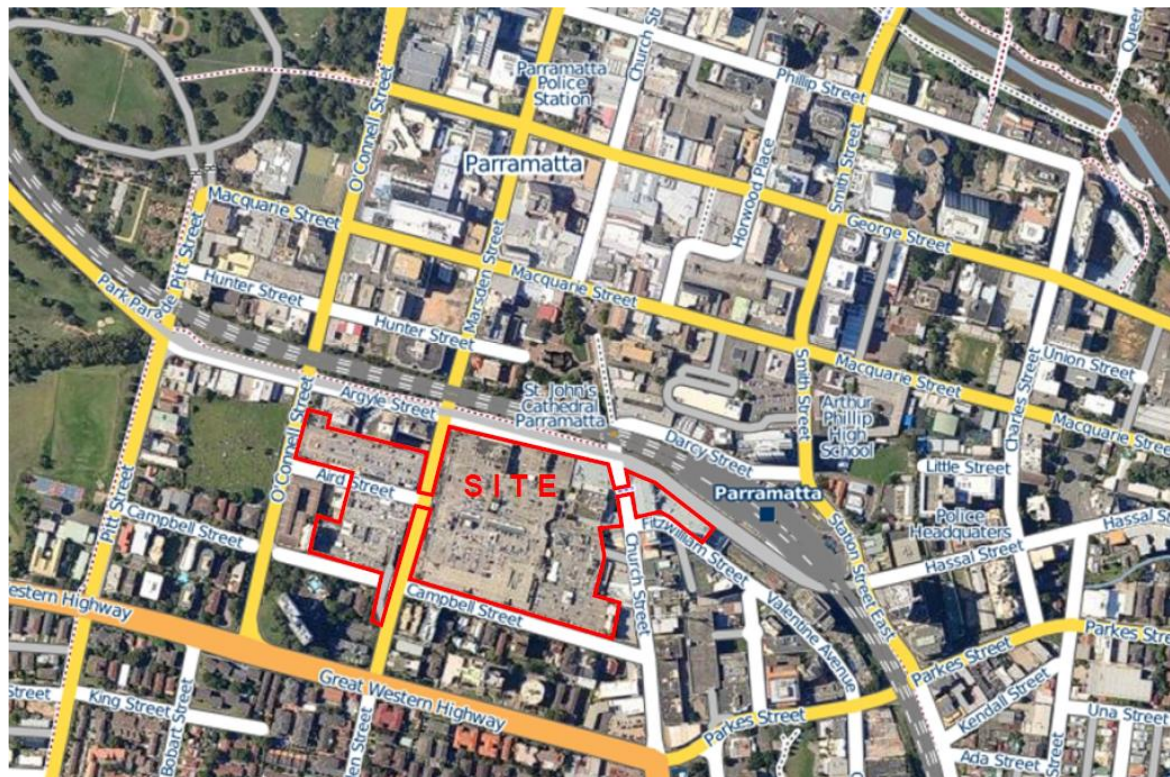
The location and extent of the site, within the Parramatta CBD is shown in Map 2, below. The Westfield site is located predominantly between Argyle and Campbell Streets, extending from the Parramatta Railway Station and Interchange, west to O'Connell Street, on the southern side of the Western railway line. The Concept Plan Approval relates to that part of the Westfield Shopping Centre site that is located west of Church Street and south of Argyle Street comprising a total area of 61,080m<sup>2</sup>. **Map No. 2**, below shows the location of the site within the Parramatta CBD. **Figure 9** on the following page shows an aerial view of the site and adjoining locality.

**MAP No. 2 Site Location**





Figure 9 – 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.

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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 61,080m<sup>2</sup>. 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 envelope has frontage to Argyle and Marsden Streets and is located on the southeast corner of this intersection. An aerial view of Westfield Parramatta and the location of the proposed office tower envelope (blue rectangle) is shown below in **Figure 10**.

**Figure 10 – 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 (4,608m<sup>2</sup> 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, was 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 exhibited in 2018, was proposed to be re-located above the Myers 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 southeast from Argyle Street, at the corner of Marsden Street. The office tower envelope, as now proposed, is to be located above the retail podium shown at left in the phot, on the eastern side of this corner.



**Photo 13** - View of the existing footpath and colonnade fronting the Myers Department store in Argyle Street, to the east of the now proposed office tower envelope.



**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 northeast from Marsden Street, towards Argyle Street. The Marsden Street frontage of the relocated office tower envelope, will extend above the retail podium shown in Photo 16.



**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.

### 3.4 Site Analysis

A Site Analysis Plan is included in the Urban Design Report attached 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 Analysis Report identifies how the proposed design responds to the site and its context and indicates the following site features and issues that impact on and inform the design process:

Strategic location near the Parramatta CBD Core 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 the locality, including Parramatta Square and mixed-use sites such as 2 O'Connell Street.

The locality around the Westfield Shopping Centre 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 and beyond.

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 David Jones Department store tenancy, fronting Argyle and Marsden Streets.

The design avoids adverse impacts on heritage items in Campbell Street, Church Street, O'Connell Street and other nearby locations, including the church.

Some adjoining sites are significantly underdeveloped and may be expected to be redeveloped in the medium to long-term. Planning Proposals have been endorsed for several new high-rise mixed-use towers adjoining and near the site.

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

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 and Marsden Streets and create a major new pedestrian entry at the corner of these 2 streets.

## 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 20<sup>th</sup> February 2014 for additions to the shopping centre, incorporating the following components:

- 31,495m<sup>2</sup> (GFA) of retail additions and associated internal modifications;
- Building envelope for commercial tower above retail podium incorporating up to 35,000m<sup>2</sup> (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 much larger floor plates and total floor space more than the 35,000m<sup>2</sup> floor space allowed for in the current Concept Plan Approval.

The existing Concept Plan Approval provides for a 20-storey office tower envelope with floor plates of up to 1,600m<sup>2</sup> 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 at the corner of Church Street and Argyle Street 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 David Jones 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 David Jones Department Store below, provision of a ground floor level office tower lobby to Argyle and Marsden Streets, 2 levels of basement car parking, activated street frontages comprising retail/café uses. At the existing retail podium roof level there is potential for 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 35,000m<sup>2</sup> to 105,000m<sup>2</sup>;
- Increase the number of office levels from 25 to 47, including 4 mid-tower transfer/service levels (Levels 18, 19, 31 and 32) and roof plant level (Level 47).
- Change the tower envelope to a generally rectangular shape, as illustrated in the enclosed plans, with a 71.5mm wide elevation to Argyle Street and 45.435m to Marsden Street.
- Increase the maximum permitted building height of 120m above ground level to a maximum of 210m above ground level (to a maximum RL 220).
- Increase maximum office tower building envelope floor area GFA from 1,800m<sup>2</sup> to between 2,032m<sup>2</sup> and 2,534m<sup>2</sup> for the office tower floor levels above the podium.
- Relocate the building envelope further to the west to provide an office tower setback of 6m to Marsden Street and 6m to Argyle Street.
- Relocate the main office tower lobby and entry from Church Street to the corner of Argyle Street and Marsden Street.
- Improved integration with the podium retail levels and enhanced presentation, activation and access to Argyle Street and Marsden Street.

## 4.2 Reference Design Potential 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 a reference design for the tower to demonstrate how a future office tower can be successfully accommodated within the proposed envelope. The now proposed GFA is reduced by 7,000m<sup>2</sup> to 105,000m<sup>2</sup>. Part 10 of the Urban Design Report (attached at **Appendix B**) includes the reference design and indicative concept plans for potential changes to the retail podium below. These potential changes include the following:

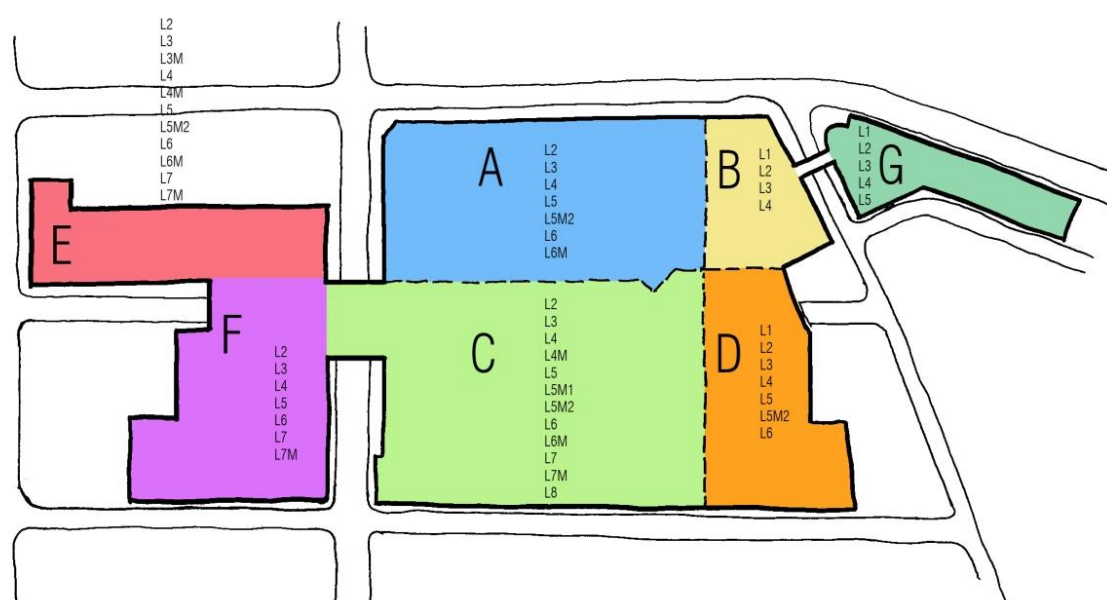
- \* Upgrade of the podium façade along Argyle Street and part of Marsden Street
- \* Ground floor office tower lobby at the corner of Argyle and Marsden Streets
- \* Activation of the ground floor level potentially including shops, cafés and other active uses with glazed frontages to Argyle Street and Marsden Street.
- \* A potential retail/café precinct above the podium connecting the office tower to the approved level 6 retail additions.
- \* provision of a 2 level basement containing 100 car spaces for the office tower and bicycle parking and end of trip facilities, with access off Marsden Street.

The public domain, pedestrian and street activation improvement and enhancement of existing retail podium façade under and near the proposed office tower will be undertaken in stages 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 Marsden Street and in Marsden Street from Argyle Street, south to the existing pedestrian overbridge, 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 narrowing of the road pavement of Aird Street (east) on either side of the existing Church Street footpaths.

The existing shopping centre is divided into 6 zones, A, B, C, D, E, and F, as shown in the following **Figure 11** below, for locational referencing within each floor level of the shopping centre. The office tower envelope, as modified, will be located within the western portion of Zone A, extending south from Argyle Street and east from Marsden Street.

Figure 11 – 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 Council, 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 6.1.2
	• State Environmental planning Policy No. 55 – Remediation of Land	Section 6.1.3
	• State Environmental planning Policy (Infrastructure) 2007	Section 6.1.6
	• NSW State Priorities	
	• A plan for Growing Sydney	
	• Parramatta Local Environmental Plan 2011	Section 6.1.6
	• NSW Long Term Transport Master Plan	Section 6.1.6
	• Sydney's Walking Future 2013	Section 6.1.7
	• Sydney's Cycling Future 2013	Section 6.1.7
	• Sydney's Bus Future 2013	Section 6.1.7
	• Sydney's Rail Future 2013; and	Section 6.1.7
	• Development Near Rail Corridors and Busy Roads 2008	
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 C & D
	• 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 Appendices C & D
	• 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
	• Address the proposed relationship between the street level entrance lobby and adjoining retail.	Section 6.2
	• 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 C, E & N
4. Visual Impacts	• 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 6.3 and Appendix L
	• 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 6.3 and Appendices L & R

Secretary's Requirements		
Key Issues	Secretary's Requirements	Reference
5. Traffic, Car Parking, Transport and Access (Operation)	<ul style="list-style-type: none"> <li>Include a Transport and accessibility impact assessment prepared in accordance with the relevant guidelines identifying: <ul style="list-style-type: none"> <li>Daily and peak hour traffic generation, public transport, walking and cycling trip generation during construction and operation;</li> <li>Existing and proposed pedestrian and bicycle routes and facilities;</li> <li>The adequacy of public transport, pedestrian and bicycle provisions to meet the demand of the proposed development;</li> <li>The impact of traffic generated on nearby intersections and any road infrastructure works required, considering cumulative impacts from other developments in the area;</li> <li>Measures to encourage sustainable travel and non-car mode share, (e.g. implementing a sustainable travel plan and end of trip facilities);</li> <li>Proposed bicycle and car parking provision demonstrating compliance with relevant RMS guidelines and Australian Standards; and</li> <li>Proposed access arrangements including service and emergency vehicles.</li> </ul> </li> </ul>	Section 6.4 and Appendix M
	<ul style="list-style-type: none"> <li>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.</li> </ul>	Section 6.4 and Appendix M
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 T
7. Public Domain and Public Access	<ul style="list-style-type: none"> <li>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.</li> </ul>	Section 6.7 and Appendix F
	<ul style="list-style-type: none"> <li>Include a Public Domain Upgrade Plan for the project covering the street edges of Church, Argyle, Marsden, Aird and Campbell Streets.</li> </ul>	
8. Economic Justification	<ul style="list-style-type: none"> <li>Provide economic and market analysis to justify the proposed variation to the approved concept tower form .</li> </ul>	Section 6.8 and Appendix G
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 R
10. Developer Contributions	Provide the scope of developer contributions proposed.	Section 6.10 and Appendix H
11. Contributions	The EA shall address provision of public benefit, services and infrastructure having regard to the Councils Section 94 Contribution Plan and/or details of any Voluntary Planning Agreement.	Section 6.10
11 Utilities	<ul style="list-style-type: none"> <li>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. .</li> </ul>	Section 6.11

Secretary's Requirements		
Key Issues	Secretary's Requirements	Reference
	<ul style="list-style-type: none"> <li>Identify and potential impacts on existing utility infrastructure and service provider assets and demonstrate how these will be protected or impacts mitigated. .</li> </ul>	Section 6.11
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 6.23
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"> <li>The City of Parramatta Council;</li> <li>Roads and Maritime Services;</li> <li>Transport for NSW;</li> <li>The Office of Environment and Heritage;</li> <li>Sydney Water;</li> <li>Sydney Trains;</li> <li>Civil Aviation Safety Authority; and</li> <li>Air Services Australia.</li> </ul> <p>The EA must describe the pre-submission consultation process, issues raised and how the proposed development has been amended in response to these issues. A short explanation should be provided where amendments have not been made to address an issue.</p>	Section 6.12

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 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. A copy of Parramatta Council's response to the Secretary's requirements is attached at Appendix W.

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 (now part of Transport for NSW), 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 part of Transport for NSW) and the NSW Department of Transport (Transport for NSW) are addressed in the assessment of key issues in Section 6.5 of the EA and in the Traffic Report, attached at Appendix M.

The original Modification proposal relocating the office tower building envelope further west from the approved location, placing the envelope above the Myers Department Store, some 79m west of Church Street was publicly exhibited in September 2018 through to the 2<sup>nd</sup> October 2018. Following this exhibition, NSW Planning Industry and Environment (DPI&E), by letter dated 29/10/2018 advised that it was not satisfied with the proposal and requested further consideration be given to key issues relating to built form, design excellence, transport and sustainability.

The revised Modification, moving the tower building envelope some 42m further west to the southeast corner of Argyle Street and Marsden Street is in response to DPI&E's issues raised in the Department's October 2018 correspondence. The response to these issues is included in the relevant sections of the revised Environmental Assessment Report. A copy of DPI&E's October 2018 correspondence and the proponent's response of August 2020 are attached at **Appendix Y**.

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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.

<b>General Requirements, Plans and Documents to Accompany the Application</b>		
<b>General</b>	The Modification Application must include:	Provided on Page 1 of the Report
	<ul style="list-style-type: none"> <li>An Executive Summary</li> </ul>	
	<ul style="list-style-type: none"> <li>A description of the existing and surrounding environment.</li> <li>A thorough description and justification of the proposal, including: <ul style="list-style-type: none"> <li>A detailed justification for proposed increases in GFA, height and floor plate size;</li> <li>Identification and analysis of alternatives, for the additional commercial floor space, and environmental impacts; and</li> <li>Description of the public benefits arising from the proposal.</li> </ul> </li> <li>Consideration of any statutory provisions (see below).</li> <li>A detailed assessment of the key issues specified below, including: <ul style="list-style-type: none"> <li>A description of the existing environment; and</li> <li>An assessment of the potential impacts of the modifications, including cumulative impacts.</li> </ul> </li> <li>An amendment to the approved Statement of Commitments (where relevant).</li> <li>A conclusion justifying the proposal, taking into consideration the environmental impacts of the proposal, and the suitability of the site.</li> </ul>	Section 3.4 of the Report & Appendix B
<b>Plans and Documents</b>	The following plans and relevant documentation shall be submitted.	
	1. An <b>existing site survey plan</b> drawn at an appropriate scale illustrating: <ul style="list-style-type: none"> <li>the location of the land, boundary measurements, area (sqm) and north point;</li> <li>the existing levels of the land in relation to buildings and roads;</li> <li>location and height of existing structures on the site;</li> <li>location and height of adjacent buildings and private open space; and</li> <li>all levels to be Australian Height Datum (AHD).</li> </ul>	See Appendices A, B & C
	2. A <b>locality/context plan</b> drawn at an appropriate scale should be submitted indicating: <ul style="list-style-type: none"> <li>Significant local features such as parks, community facilities and open space and heritage items;</li> <li>The location and uses of existing buildings, shopping and employment areas; and</li> <li>Traffic and road patterns, pedestrian routes and public transport nodes.</li> </ul>	See Appendix B & large size plans enclosed separately
	3. <b>Drawings</b> at an appropriate scale illustrating: <ul style="list-style-type: none"> <li>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;</li> <li>detailed plans, sections and elevations;</li> <li>the height (AHD) of the proposed development in relation to the land; and</li> <li>any changes that will be made to the level of the land by excavation, filling or otherwise.</li> </ul>	See Appendix B & C and large size plans provided separately

General Requirements, Plans and Documents to Accompany the Application		
	<p>4. <b>Shadow diagrams</b> 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.</p>	See Appendix B
	<p>5. <b>3D modelling</b> of the proposal and the surrounding development in digital format in accordance with the relevant guidelines.</p>	See Appendix B
	<p>6. <b>Visual Impact Assessment</b> 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><b>Visual assessment methodology</b></p> <ul style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>Visual catchment should be defined and explained (see below).</li> <li>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.</li> </ul> <p><b>Visual catchment</b></p> <ul style="list-style-type: none"> <li>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.</li> <li>Categories of views (e.g. from the water, from public open space, from key streets, from main buildings and from key heritage items) should be defined.</li> <li>Photos are required for representative view categories, plotted on a map.</li> </ul> <p><b>Visual material</b></p> <ul style="list-style-type: none"> <li>Reference to be made to site analysis.</li> <li>Provide key plan indicating where viewpoints are located and narrative explaining why these have been selected.</li> <li>The modified and approved built form should be illustrated in the context of the visual catchment to enable assessment of the visual impact.</li> <li></li> </ul>	See Appendix L

General Requirements, Plans and Documents to Accompany the Application		
	<ul style="list-style-type: none"> <li>The location of cross-sections should be clearly shown on a key plan and the choice of positions explained. The cross sections should be shown in the context of the visual catchment.</li> <li>Vertical exaggeration should provide an accurate rather than 'flattened' impression of buildings in the context of the visual catchment.</li> <li>A key plan must be provided for photomontages. In addition, the choice of locations should be explained. Photomontages should be provided for close as well as distant views.</li> <li>Assessment must benchmark against the existing situation and currently approved plans.</li> <li>Photomontages to be provided for key viewpoints from all directions, and from several positions within the visual catchment including Church Street (from north to south), Fitzwilliam Street, Argyle Street, Centenary Square, Old Government House and Lancer Barracks.</li> <li>As above, support visual evidence such as cross sections to be drawn to realistic scales and shown in context.</li> <li>A comparison of 'before', 'approved' and 'proposed' is fundamental to a visual impact assessment, therefore the visual impact assessment (A3 in size) should be undertaken using human eye focal lengths (50mm at 35mm) FX format and 46° angle of view) from long range, medium range and short range positions so that they can be assessed with respect to visibility, visual absorption capacity and visual impact rating, as well as a comparison analysis with the approved project.</li> </ul>	
	7. <b>Wind Impact Assessment</b> including tunnel modelling.	See Appendix O
	8. <b>Traffic and Transport Impact Assessment.</b>	See Appendix K
	9. <b>Public domain interface plan.</b>	See Appendix B & D
	10. <b>Heritage Impact Statement.</b>	See Appendix R
	11. <b>Transport Management and Accessibility Plan.</b>	See Appendix K
	12. <b>Conceptual Water Management Plan.</b>	See Appendix F
	13. <b>Conceptual Infrastructure Servicing Plan.</b>	See Appendix F
	<ul style="list-style-type: none"> <li>Shadow Diagrams</li> <li>Stormwater Concept Plan</li> <li>Erosion and Sediment Control Plan</li> <li>View Analysis</li> <li>Construction Management Plan and Traffic Management Plan</li> <li>Construction Methodology</li> </ul>	See Appendices B, E, H, N & O

## 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 Director General's Requirements, including additional matters relating to key issues, raised in DPI&E correspondence dated 29<sup>th</sup> October 2018, responding to the exhibition of the original modification proposal. Relevant supporting specialist reports are identified in relation to the issues and included as Appendices. The following table provides a summary of how the Director General'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>	<p>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 revised proposal accords with planning strategies and policies for the Parramatta CBD.</p> <p>Apart from a variation to the maximum FSR for the site and maximum building height (office tower component only) and a minor variation to the DCP street front building height/setback control, the revised proposal complies with the relevant development standards prescribed in the Parramatta City Centre LEP and DCP.</p>
2. <i>Built Form/Urban design</i>	<p>The retail and car park additions are designed to integrate with the existing east-west built form of the shopping mall. Maximum building height of 34.14m is less than the maximum 36m height permitted for the site. The retail/car park additions are well articulated and the large skylight over the pedestrian mall adds visual interest. Decorative metal screens are proposed to screen parking levels from view from the public domain and add visual interest within the streetscape.</p> <p>The proposed office tower envelope extends to a height of RL220, though 174m above the building height control, is appropriate in the circumstances having regard to adjacent and nearby existing and proposed tower buildings and the urban design benefits of providing a landmark building within the southern precinct of the Parramatta CBD.</p> <p>The tower building, above a height of 22 metres is setback 6m from the Argyle and Marsden Street frontages and at least 120m from Church Street. The revised location places the tower envelope outside the Church Street view corridor to the church and aligns with tower setback requirements to Church Street, north of Macquarie Street. The proposal maintains solar access to and northwest views from the high-rise apartment buildings on the eastern side of Church Street. An architectural competition will be held to ensure a high-quality building design.</p>
3. <i>Amenity</i>	<p>Apartments in the locality will continue to receive at least 2 hours mid-winter solar access between 9am and 3pm. Separation distance of more than 100 metres from the tower envelope ensures adequate aural and visual amenity to the nearest apartment buildings. Limited view impacts arising from the proposed retail/car park levels are acceptable having regard to the high-density CBD context of the site and full compliance with the maximum building height standard for car parking facilities. The office tower, where it exceeds building height limit has minimal view impact and forms part of the CBD backdrop as viewed from neighbouring properties in the locality.</p>
4. <i>Traffic and Transport impacts (Construction and Operational)</i>	<p>The site is well served by public transport, including regular and frequent rail and bus services adjacent to the site, with light rail services to be available nearby in the near future. 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 in the order of 10%-15%. Net increase in peak hour traffic generation is within the capacity of the existing road system in the Parramatta CBD, with some minor intersection improvements. The Construction Management Plan includes arrangements for managing parking and construction traffic during the construction phase.</p>
<p>5. <i>Traffic, Car Parking, Transport and Access (Operation)</i></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. Maximum parking provision prescribed in the LEP is 1,050 car spaces for the additional retail floor space and 350 car spaces for the additional office space. There will be a net increase of 542 car spaces, a parking provision that is well under the maximum permitted and adequate to meet increased demand arising from the proposed additional floor space, without encouraging undue reliance on the private motor vehicle for work or shopping trips.</p> <p>The proposal includes bicycle parking and end of trip facilities in the proposed basement, below the existing retail podium under the office tower envelope, to further discourage use of private motor vehicles as the means of accessing the site.</p>
<p>6. <i>Heritage</i></p>	<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 Johns Cemetery in O'Connell Street and St Johns Cathedral in Church Street. The Heritage Impact Statement (HIS) attached at <b>Appendix T</b>, 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 notes that the revised tower envelope is located outside the 40m wide Church Street heritage view corridor south to St Johns Cathedral and concludes that the proposed development will have no adverse impact on the subject heritage items.</p>
<p>7. <i>Public domain and Public Access</i></p>	<p>Stage 2 of the proposed development includes public domain improvements to the footpaths around the site and primary pedestrian connections to the site and façade improvements. 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>
<p>8. <i>Economic Justification</i></p>	<p>An Economic Impact Assessment is attached at <b>Appendix G</b>. This assessment indicates the proposal will result in significant investment in the Parramatta CBD &amp; create an additional 700 plus retail jobs &amp; provide office space capable of accommodating 2,000 white collar workers.</p> <p>Impacts on other retail centres in the Westfield Parramatta trade area will be minor, averaging minus 1.7% in turnover. This will be a short-term impact, due to significant population, employment and retail expenditure growth anticipated in the trade area.</p>
<p>9. <i>Ecologically Sustainable Development (ESD)</i></p>	<p>The building has been designed to achieve a 5 Star Green Building rating and accord with ESD principles and the requirements of PDPC 2011 with respect to building rating. 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>
<p>10. <i>Developer Contributions</i></p>	<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. A separate additional contribution is proposed towards the cost of public domain improvements in Church Street.</p>

11. Utilities	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.
12 Pre-submission Consultation Report	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 <b>Appendix O</b> . Consultation has also occurred with a range of public agencies, including Parramatta City Council.
13. Statement of Commitments	A Draft Statement of Commitments is included at Section 6.13 of this Environmental Assessment Report.

## 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, as required by PDGP 2011. 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 large floorplate 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 landscaping within the public domain. A portion of the terrace on the podium roof, near the office tower will be provided with landscaping, enhancing 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, by moving the tower envelope to the southeast corner of Argyle Street and Marsden Street. 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	The proponent has undertaken a pre-lodgement consultation with relevant government agencies and with the local

planning and assessment.	community, as detailed in the section of this EA Report dealing with Pre-submission Consultation Statement. The original Modification was publicly notified in September 2018 through to 2 <sup>nd</sup> October 2018 in accordance with the requirements of the EPA Act. Public submissions and submissions from various government agencies were received during the notification period. The revised Modification has been prepared after careful consideration of these submissions. The revised Modification will be re-exhibited and during the public notification period, plans and supporting information will be on display at Westfield Parramatta, as well as at Council and DPI&E.
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## 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 or heritage items in the locality. 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 3,000, the proposed modification will make an important contribution towards the planned increase of 100,000 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 and a light rail service currently under construction, 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 700,000m<sup>2</sup> 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 large floor plate 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 and 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 400,000m<sup>2</sup> of commercial and retail floor space. A substantial portion of this additional floor space, estimated at approximately 250,000m<sup>2</sup>, 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 (150,000m<sup>2</sup>) 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

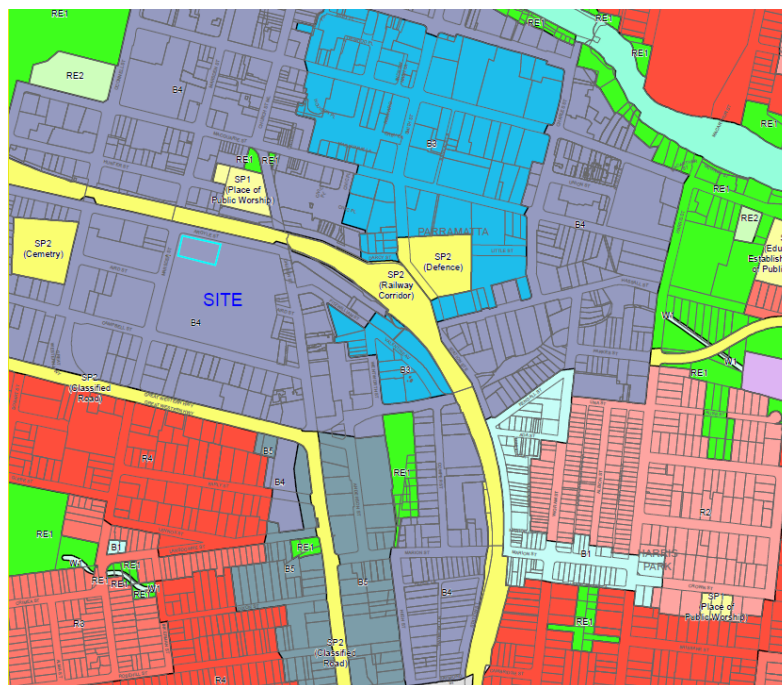
Parramatta Local Environmental Plan 2011 (PLEP 2011) is the applicable Local Environmental Plan applying to the subject land. With respect to the Parramatta City Centre, the LEP aims to protect and enhance the viability, identity and diversity of the Parramatta City Centre and recognise it as the pre-eminent centre in the Greater Metropolitan Region.

The proposed modification, by providing substantial additional premium large floorplate 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 within the Westfield Shopping Centre Parramatta, as modified in the location on the southeast corner of Argyle and Marsden Street (shown below by a blue rectangle) is adjoined to the east, south and west by land zoned B4 Mixed Use,

**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. 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.



Non-compliances with respect to maximum building height and maximum floor space ratio will not be the case following exhibition and subsequent gazettal of Draft Parramatta LEP, which proposes a significant increase in maximum building height and FSR for much of the Parramatta CBD, including the subject land.

## *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 has a height of 180m above the retail podium, extending to RL 220 at the top of the tower, equating to 210m above existing ground level at the Argyle Street frontage. The tower therefore exceeds the maximum height control by up to 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 (to RL 220) is based on the objective of creating a landmark building near Parramatta Square and the Parramatta Railway Station and the Transport Interchange. Council aims to encourage high rise redevelopment in the Parramatta CBD, and has prepared a Draft LEP, which provides for a substantial increase in floor space ratios and building heights in much of the Parramatta 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 the 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

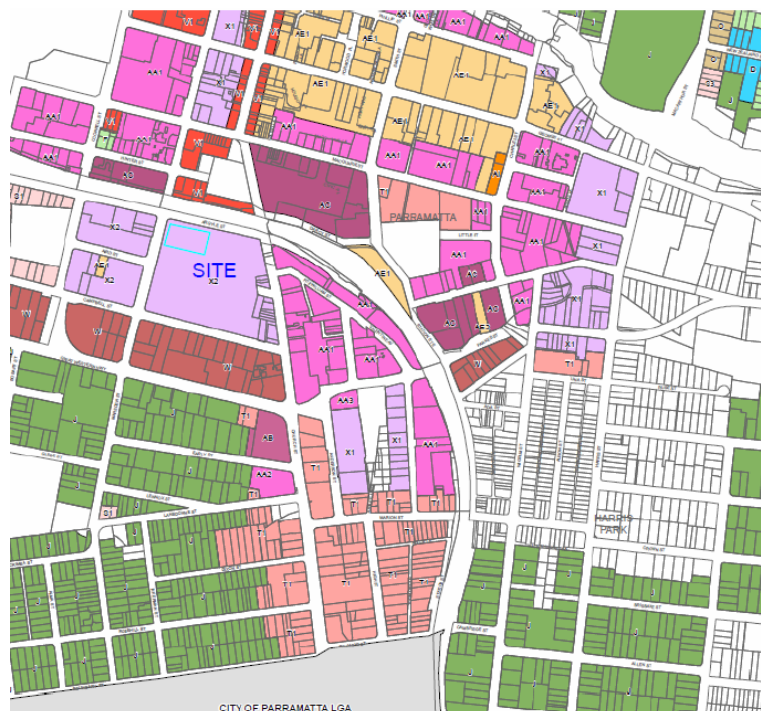
## *Clause 4.4 Floor Space Ratio Control*

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 within the subject land is located on the southeast corner of Argyle and Marsden Streets. 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 279,905m<sup>2</sup>, which equates to an FSR of 4.58:1. The current concept approval for the additional retail level (31,495m<sup>2</sup>), additional car parking and the 35,000m<sup>2</sup> office tower increases assessable GFA to 366,400m<sup>2</sup>, which equates to an FSR of 5.56:1. This FSR 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, which is assessable GFA in PLEP 2011.

The office tower envelope as modified provides for an assessable GFA of up to 105,000m<sup>2</sup>, some 70,000m<sup>2</sup> greater than currently approved. The resulting GFA on the site, less a small reduction in existing retail GFA, is in the order of 435,000m<sup>2</sup>, equating to an FSR of 7.12:1, which is almost 30% less than the 10:1 maximum FSR proposed in the Draft PLEP.

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 PLEP 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 7.12:1 down to around 5:1, which is commensurate with the FSR allowed for nearby land on the eastern side of Church Street.

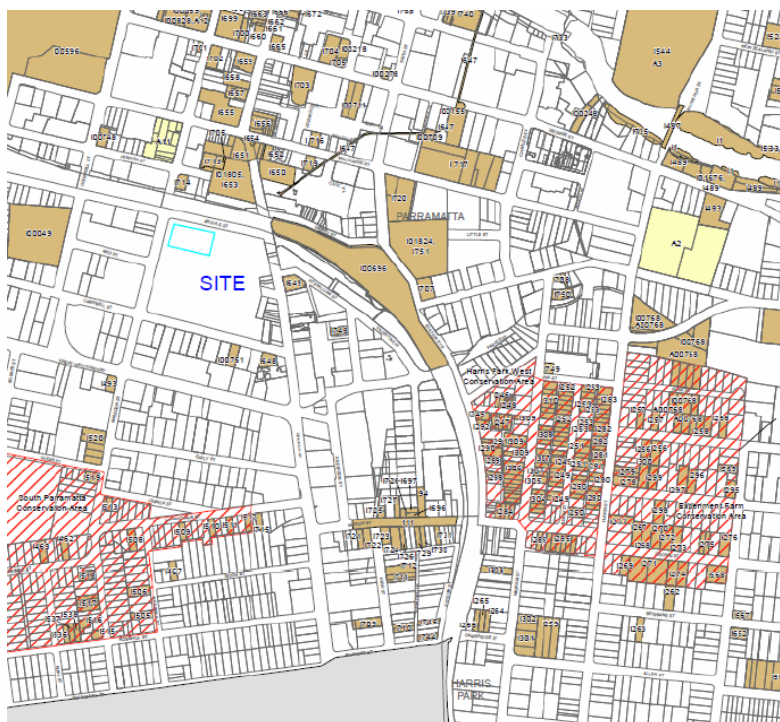
The additional office floor space proposed in the modification will have no traffic impact, as there is no increase in the number of car spaces (100) proposed for the office tower, notwithstanding the substantial increase in floor space. About 90% of office workers in the building will access the site 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. Further, as noted above, proposed FSR of 7.12:1 is also almost 30% less than the 10:1 maximum FSR proposed under the Draft LEP that Council has prepared.

## Clause 5.10 Heritage

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 Heritage Map.

**Map No 6 - Parramatta LEP 2011 Heritage Map Extract**



Clause 5.10(5) requires an assessment of potential impacts on the heritage significance of heritage items near the development site. These include the World heritage listed Old Government House and Parramatta Park and several State listed heritage items such as St John's Anglican Cemetery, the Traveller's Rest Inn at 14 O'Connell St. St John's Anglican Church, Parramatta Railway Station and Parramatta Railway Group, and Lennox House at 39 Campbell Street.

Heritage impacts have been addressed in the Heritage Impact Statement prepared by Noel Bell Ridley Smith & Partners, 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. Heritage impacts are reduced in comparison to the exhibited Modification, as the revised Modification moves the tower envelope 42m further west and outside the 40m wide view corridor, south down Church Street, to St Johns Cathedral.



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*Part 7 Additional local provisions – Parramatta City Centre*

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 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 100m<sup>2</sup> of floor space for commercial premises. The proposal provides 100 car spaces for an assessable commercial office GFA of 105,000m<sup>2</sup>. This equates to 1 car space per 1050m<sup>2</sup> of floor space. This is well below the maximum number of car spaces permitted (1,050 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 revised Modification will result in the removal of 120 existing car spaces above David Jones, which are located within the revised office tower envelope. The 2 level basement car park identified for future development to provide parking for the office tower will contain 100 car spaces, which is 20 less than 120 car spaces to be removed above David Jones. 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.

As the City Centre car parking requirements prescribed in Part 7 the LEP are expressed as a maximum, the 100 basement car spaces proposed for the office tower complies with LEP requirements. The Modification results in an overall reduction in additional car spaces from 562 to 462. As noted above there is a net loss of 20 car spaces in the revised Modification. Accordingly, the total number of additional car spaces reduces from 562 car spaces to 542 car spaces. This is achieved by reducing retail car spaces by 20 from 462 car spaces to 442 car spaces. Retail car parking remains compliant as parking requirement in the DCP are specified as a maximum, not minimum.

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.

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Parramatta Council has requested consideration of potential overshadowing of Ollie Webb Reserve, to the southwest of the site. There will be no overshadowing of this public reserve between during the mid-winter solar access protected hours 10am to 3pm.

#### *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 in accordance with Parramatta Council’s Design Excellence Policy.

The proposed office tower envelope and location are appropriate for accommodating a major A Grade large floor plate office tower. The reference design indicates that an office tower can be readily 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.

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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**.

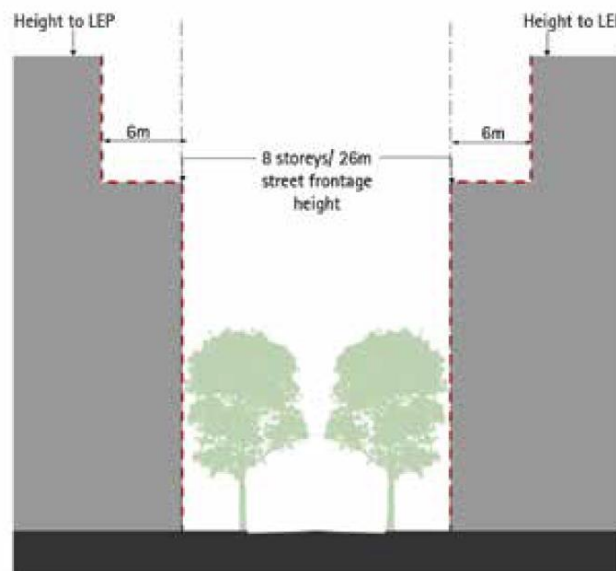
The proposed development generally complies with development controls in the City Centre DCP. The following discussion addresses the proposed modification in relation to the primary development controls in the DCP, relevant to assessing a tower building envelope.

## 6.1.7.2 Street Frontage Heights and Upper Level Street Front Setbacks

A street frontage height of 8 storeys/26m applies to the Argyle and Marsden Street frontages of the site. Above that height a minimum 6m setback applies to the street frontages. 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 12** 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 and Marsden Street, adjoining the site. In these locations a 26m street frontage height applies.

**Figure 12 – 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.*

The existing retail podium extends to a height of up to 34m and exceeds the 26m height control shown in **Figure 10**. The Modification does not propose any increase in height for the retail podium and as the proposed office tower building envelope will be setback 6m to each street frontage, is compliant with clause 6.1.7.2 of the DCP. The proposal also achieves the objectives of the street frontage height/setback control and provides for a suitably framed streets, with ample tower building separation, appropriate transition between public and private space and no adverse privacy or shadow impacts.

#### 6.1.7.3 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.

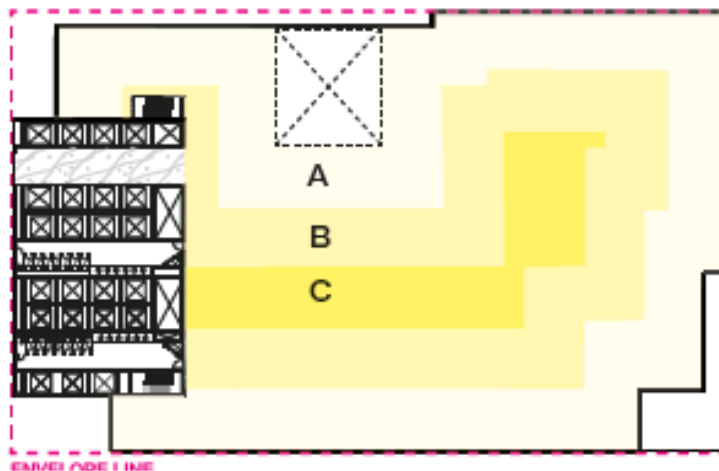
The proposed office tower envelope is located on a corner and has a substantially compliant length of 45.435m as measured to Argyle Street. The horizontal length to Argyle Street is 71.5m in order to achieve the necessary floor plate size. Given the substantial height of the proposal and its location as a tower in space, with a separation distance of more than 100m to the nearest existing or potential tall tower, the additional 25m horizontal length to Argyle Street is considered reasonable.

The future building will be articulated within the proposed building envelope, which is some 30% larger to provide for articulation of the future office tower, particularly with respect to the middle and upper portions of the tower. This is demonstrated in the reference design and will therefore not occupy the full length and depth of the building envelope. The proposed building envelope also offers ample space for building articulation for any future office tower, to avoid large expanses of blank building wall.

Larger floor plate office buildings are unable to locate all office space within 12m of sources of daylight. In these situations, office floor space that is more regularly occupied, or where optimal access to natural light is more desirable, floor layouts are design so that those areas are for the most part within 12m of a natural light source. Meeting rooms, service areas and the like can be located further from natural light sources without detrimental impact.

Glazing details and access to natural light would be addressed in detailed design of the office tower. The reference design includes potential floor layouts and a diagram showing access to natural light performance for the typical tower floor plate. This diagram is reproduced below, as **Figure 13**.

Figure 13 – Access to Natural Light



Areas A and B on the above plan are located within 12m of natural light sources and achieve good to excellent access to natural light and indicate that 85% of useable office floor space is within 12m of a natural light source. A result of 80% or more is considered acceptable for large floor plate office buildings. Virtually all floor space is within 15m of a natural light source.

#### 6.1.7.4 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 100m.

#### 6.1.7.5 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 6m front setback to the Argyle and Marsden Street frontages above the retail podium, will ensure complying wind conditions at street level. Design measures 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.

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 Draft LEP proposes to extend the boundaries of the B3 City Core Zone to include the Westfield Shopping Centre and 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.

**Figure 13A**, below shows the proposed building heights for the Westfield Shopping Centre and the adjoining locality.

**Max Building Height**

0m - A	72m - AA4
6m - E	80m - AB1
8m - I	86m - AB3
9m - J1	90m - AB4
10m - K	100m - AC1
11m - L	102m - AC2
12m - M	110m - AC3
15m - O1	118m - AC4
18m - P2	120m - AC5
20m - Q	130m - AD1
24m - S	136m - AD2
26m - T2	150m - AE
28m - T3	190m - AF1
34m - U2	192m - AF2
36m - V1	200m - AG
40m - W	211m(RL)
49m - X3	Sun Access Protection Surfaces
54m - Y2	

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 RL 211 in the order of 200m apply. As shown in **Figure 13A**, a maximum building height of RL of 211 (approximately 200m) applies to a substantial portion of the Westfield Shopping Centre site, located on the western side of Church Street.

The site of the proposed office tower envelope, as modified in the location now proposed, is almost totally within the area of the site nominated for a maximum RL of 211, equating to a building height of approximately 200m in this location. While the proposed office tower envelope extends to a height marginally above RL 211, by some 9m, it is substantially consistent with the building height control proposed in the Draft LEP. This contrasts with the exhibited tower envelope location which falls within the area designated for a much lower maximum height of 36m.

The proposed office tower, as modified, aligns with the objectives of DLEPCC 2016, as exhibited, which aims 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 exhibited Draft LEP.

## 6.1.9 STATE AND REGIONAL ENVIRONMENTAL POLICIES

### 6.1.7.1 *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, 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 on any future DA 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.

#### 6.1.6.2 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 Transport (TfNSW).

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 office tower envelope modification does not result in any change to existing vehicular access to the site. The proposed office tower and basement parking will be accessed and serviced from the existing driveway off Marsden Street and utilise the Marsden Street loading docks on the eastern side of Marsden Street. 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 on 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 Transport for NSW (TfNSW) for consideration.

The TfNSW 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.

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The TfNSW required some improvements to the road network near the site, which were required to be completed prior to construction works commencing on the site. Several of the required road improvements have recently been completed.

In the response to SEAR's, TfNSW (Roads & Maritime Services), by letter dated 19/9/17 requested that the Transport Accessibility component of the EA Report address a range of matters such as vehicle trips, adequacy of public transport, arrangements for walking and cycling, access arrangements, car and bicycle parking, end of trip facilities and service vehicle arrangements be addressed. These matters are addressed in the Traffic Report attached at **Appendix K** and summarised in Section 6.4 of the EA Report.

A total of 100 car spaces will be provided in a future basement directly 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 120 car spaces above the David Jones 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 childcare 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.

#### 6.1.10 PLANNING POLICIES AND GUIDELINES

##### 6.1.8.1 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 and widening of the M4 (both now complete), 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.

## 6.1.8.2 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, reduced retail parking 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, motorcycle 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 40m<sup>2</sup> of GFA (which equates to 2,800 car spaces) but 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.

## 6.1.8.3 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.

#### 6.1.8.4 *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 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.

#### 6.1.8.5 *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, as follows:

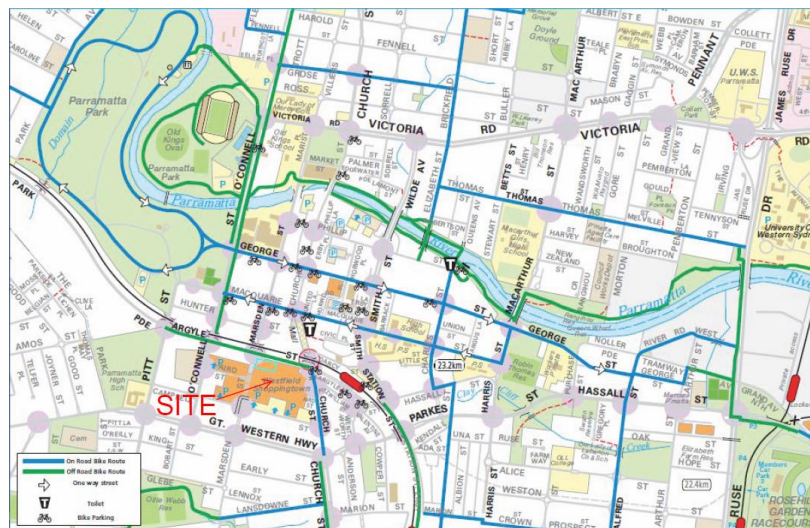
- On-site parking is minimised, to encourage use of public transport, cycling and walking.
- The site is within easy and safe walking distance of the Parramatta Railway Station and Transport Interchange and Parramatta Square.
- Many medium and high-rise residential buildings are located within walking 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 Marsden Street and through the existing shopping mall to the Church Street.
- 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 shops at ground level to Argyle Street and Marsden 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 in the future basement, for those who cycle, jog or walk to the site.

#### 6.1.8.6 *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. **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 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. Marsden Street is also utilised as an internal route for cyclists within the CBD. 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.  
(2)
- 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 Marsden Street.

- Future access for cyclists is proposed off Marsden Street (east side) to more proposed bicycle parking spaces and end of trip facilities such as showers, toilets and lockers to be located in the basement, accessible to the ground floor tower lobby. Details of these bicycle parking spaces, and end of trip facilities will be included in the future DA plans.

## 6.1.8.7 *Sydney's Bus Future 2013*

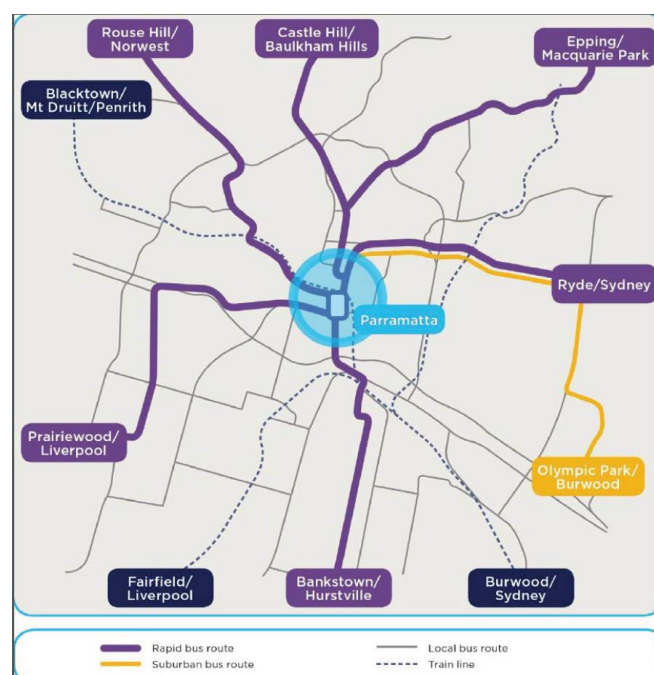
Sydney's Bus Future (SBF 2013) was released by the NSW Government in 2013 and aims to deliver a modern and customer focussed integrated bus system providing simpler, faster and better bus services, with the objective of attracting more customers to use bus services throughout Sydney.

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**, on Page 60.

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.
- 

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





#### 6.1.8.8 *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.

Rail access is to be further enhanced by the recently announced Metro West rail line proposed to include an express metro service between the Sydney CBD and the Parramatta CBD, with a limited number of intervening stops between the 2 centres and significantly reducing travel times.

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.

#### 6.1.8.9 *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.

Construction work has recently commenced on Stage 1 of the Western Sydney Light Rail. 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 500m) from the proposed office tower ground floor lobby 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.

#### 6.1.8.10 *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 Westfield Parramatta Shopping Centre proposed will be provided with more than 500 bicycle parking spaces. A substantial portion of these bicycle parking spaces and end of trip facilities will be provided in the proposed basement, accessed off Marsden Street. 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 the Traffic Management and Accessibility Plan.

#### 6.1.8.11 *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 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, childcare centre, hospital, and the like. Notwithstanding this situation, the issue of noise/vibration impacts has been considered in the Preliminary 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 approval/s required under the Airports Act 1996 due to the proposed height of the commercial tower.*

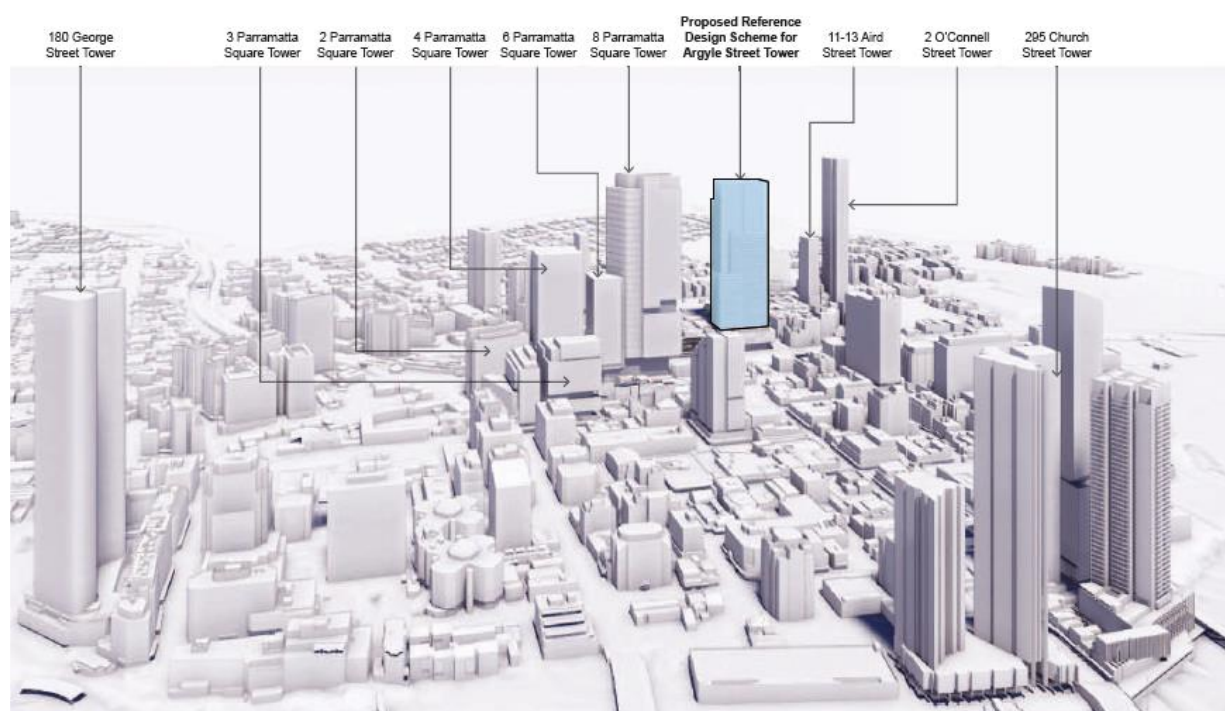
### **6.2.1 Height, Bulk and Scale within the Context**

The existing site context, in 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 more than 8 storeys.

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. The existing 25 storey apartment tower at the corner of Church Street and Fitzwilliam Street, whilst occupying a modest building footprint, due to its significant height, is also clearly evident in the townscape of the precinct as will be the nearby Walker high-rise development , currently under construction. .

The existing context is likely to change over time as new high-rise buildings are developed in accordance with the increase in density and height permitted under the City PLEP 2011. Several Planning Proposals have been endorsed for new high-rise towers near the site that extend well above the current height controls. Accordingly, it is not appropriate to assess building height, bulk and scale against the height and FSR controls that currently apply to the site and locality. **Figure 14** below shows the proposed reference design (coloured light blue) within the Parramatta CBD context that is anticipated to exist by the time the proposed tower is constructed.

**Figure 14 – Proposed Tower Within the Emerging Parramatta CBD Context**

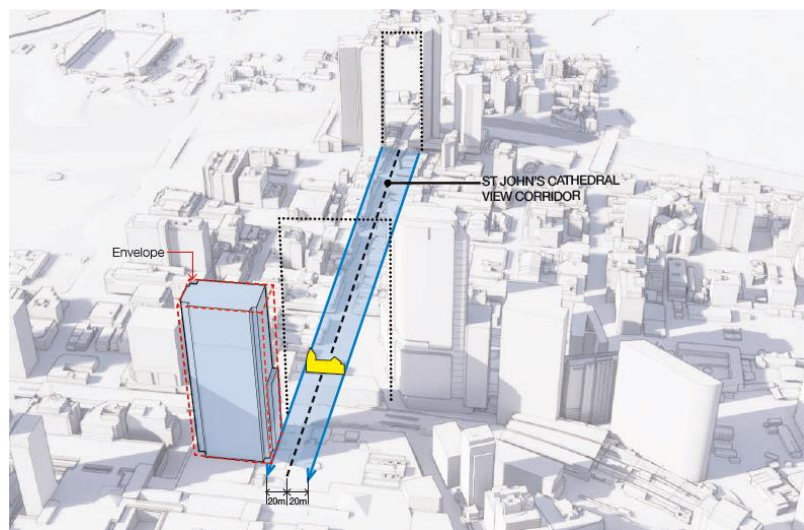


As illustrated above, the proposed tower envelope, as modified, will be compatible with the emerging high-rise character of the Parramatta CBD, in terms of height, bulk and scale.

Parramatta Draft LEP 2016, when gazetted, will provide for substantial increase in building height and FSR over most of the Parramatta CBD. Proposed height, bulk and scale is compatible with nearby development in Parramatta Square and with future development that may be expected to occur following gazettal of the Draft LEP and construction of new tall towers, proposed in recently endorsed Planning Proposals.

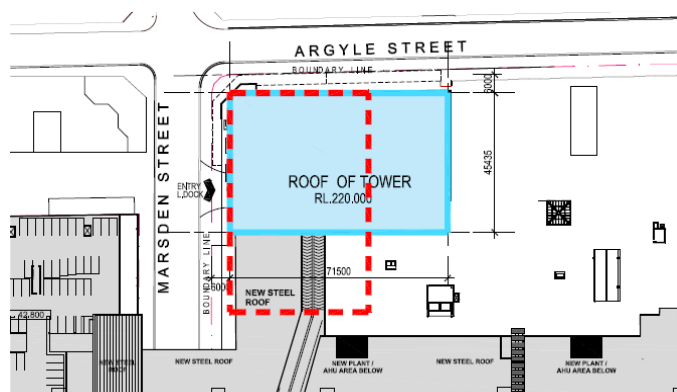
The Urban Design Report attached at **Appendix B**, provides a detailed urban design and site analysis informing proposed tower location and built form. The location of the office tower envelope, as exhibited, was not supported due to its location within the heritage view corridor, extending south down Church Street, to St Johns Cathedral. The proponent was advised to consider relocating the building envelope further west. Accordingly, the revised Modification moves the tower 42m further west to the southeast corner of Argyle Street and Marsden Street, clear of the nominated view corridor. This is illustrated in **Figure 15**, on Page 66..

**Figure 15 – Church Street Heritage View Corridor South to St Johns Cathedral**



The Urban Design Analysis identifies 2 potential configurations – an east-west tower orientation, with the long elevation fronting Argyle Street (Option 1) and a north-south tower orientation, with the long elevation fronting Marsden Street. The Analysis indicates Option 1 offers a superior urban design and functional outcome, offering the following advantages.

- Consistency with the provisions of PDCP 2011, which favour an east-west long elevation over a north-south long elevation
- The east-west alignment is consistent with the Parramatta CBD urban grid, aligning with tower building setbacks to the western side of Church Street, north of Macquarie Street.
- Facilitates development of a landscaped terrace on the podium which aligns on its western side with the western alignment of public open space in Parramatta Square, to the north.
- Provides a ground floor lobby predominantly aligned to Argyle Street, a far more important pedestrian route compared to Marsden Street and closer to the Transport Interchange.
- Provides a greater length of active street frontage to Argyle Street.
- Achieves far superior solar access by aligning the long elevation not the north, with reduced exposure to afternoon summer sun and reduced shadow impacts to the south.
- Can be constructed within the structural constraints of the existing podium, where the structural zone aligns with the southern elevation of the tower, in its east-west orientation.
- Avoids a driveway being located through the middle of the long elevation in the north-south option, as shown below in **Figure 16**, where the red dashed line is the north-south option and the existing driveway to the loading dock is indicated with a black arrowhead.



**Figure 16 –**

**Loading Dock Driveway Impact on Tower Orientation Options**



## 6.2.2 Façade, Massing, Setbacks and Building Articulation

The Urban Design Report provides a detailed analysis of façade massing, setbacks and building articulation. The reference design illustrates how a future tower could be designed within the envelop to provide adequate articulation. **Figure 17** below, shows a CGI view of the reference design illustrating the tower form located above an enhanced retail podium, with upgraded façade and active street frontages at ground level.



**Figure 17 –**

**CGI View of Tower  
Reference Design Façade  
Massing & Articulation**

The reference design provides for increased articulation as height increases, to moderate the massing of the building and mitigate perceived bulk and scale. The office tower is for concept approval and therefore is limited to a building envelope only. Façade detail and tower architecture and articulation for the tower within the envelope would be developed as part of the design excellence process and preparation of development application plans.

Opportunities for landscaping are limited, as existing buildings cover the whole of the site, therefore it is not possible to provide landscaping at ground level. The tower envelope provides space on top of the podium for potential development of a landscaped terrace including cafes and retailing, extending from the base of the tower across the existing podium to the approved level 6 retail additions. on the proposed office podium roof level.

Relatively tall street trees around the extensive road frontages of the site create a green edge to building elevations, particularly along Campbell Street and Argyle Street. There are opportunities to provide additional street trees.



Development of the proposed tower of the proposed development includes improvements to the public domain around the site and within pedestrian routes leading to the site. Additional landscaping, including trees, is proposed as part of the public domain upgrade. The extent of existing and proposed landscaping around the site is considered to be adequate having regard to the high-density CBD context of the site and established built form on the site.

The principles of crime prevention through environmental design (CPTED) would be considered in the future design of the proposed office tower. Opportunities for passive surveillance are optimised and a functional and legible internal pedestrian circulation system, including directional signage, is proposed.

Ample lighting can be provided, and concealed spaces have been minimised in areas frequented by the public. Closed circuit television (CCTV) and security staff are provided on site. Increased street activation to Argyle Street will enhance surveillance of public domain in this busy street which also provides bus parking.

#### 6.2.3 Public Domain and Activated Street Frontages

Proposed improvements to the public domain, including activated street frontages are identified and addressed in Section 6.7 of the Environmental Assessment Report.

#### 6.2.4 View and Visual Impact Analysis

A View and Visual Impact Analysis of the proposed development, as viewed from key vantage points is attached at **Appendix L** to assist in assessing visual impact of the proposal.

One of the aims of Parramatta LEP 2011 is *“to facilitate the development of building design excellence appropriate to a regional city to improve the quality of urban design and ensure the public domain is safe and attractive.”* PLEP 2011 controls in relation to building height are designed to *“provide high quality urban form, provide a transition in built form and land use intensity within the area covered by the Plan, have regard to heritage sites, and their settings, their views and their visual interconnections, and ensure the preservation of historic views and their visual interconnections.”*

Parramatta DCP 2011 (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.*
-

Figure 18 - Extract from PDCP 2011 Historic Views

#### APPENDIX 2 – HISTORIC VIEWS



The DCP requires that existing views, as identified in Appendix 2 to the DCP, be protected in the planning and design of development; 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. Appendix 2 identifies key historic views such as from Old Government House, Parramatta Park and Mays Hill, and street views along Hunter Street, Church Street (north) and George Street. The historic views and their significance as outlined in Appendix 2 of the DCP are set out on Page 68.

Identified View	Significance
1. Old Government House view northeast to the river, Old King's School building and site of former Government farm.	Key historic view demonstrating the relationship between the Governor, early Government farm and major school institution. Setting of both heritage items.
2. Views east to St John's along Hunter Street, available back to Parramatta Regional Park.	Hunter Street framed view to St John's church.
3. Views to St John's church and square from north	Historic main street approach to city centre and St John's historic church and other heritage items in view.
4. Views west, from eastern side of square, mall, Civic Place and Town Hall.	Backdrop/setting of church. Views to church and spires.
5. Views north and south along Church Street, including view of ANZ Dome and heritage buildings, St John's Church spires to the south and St Peter's church.	Historic main street and approach to city. A number of heritage buildings.
6. Approach to Parramatta south along Church Street from Fennell Street, sequential views.	Historic main street and approach. Relatively consistent scale and setback of streetscape.
7. Views along George Street to Parramatta Park gatehouse and trees.	Key historic street approach to the park. City edge of park, framing views to gatehouse, trees and Old Government House (not now visible), views of streetscape, heritage items.
8. View from Marys Hill across Parramatta's City Centre to distant hills.	Key historic viewing point from the highest part of the Parramatta Park with best views of the city in the river valley, glimpses to hills behind the city between buildings.
9. View from The Crescent to the distant hills	Key historic viewing point from the ridge of The Crescent to glimpses of distant hills between buildings.

The appearance of new development, particularly as viewed from the public domain and the identified historic views, is an important issue with respect to achieving high quality urban design and an attractive Parramatta CBD.

The exhibited location of the modified envelope assumed that the heritage view corridor south along Church Street, terminated at St Johns Cathedral. It has since been determined that the intention of the view corridor includes maintaining the sky view above the Cathedral. As illustrated in **View 1** below, this is achieved with the revised location, further to the west.

## Visual Impact View 1 - St Johns Cathedral & Tower Envelope looking South Down Church Street.



Photomontages have been prepared from key viewing locations within the public domain, looking towards the proposed development. These viewing locations include Parramatta Park Old Government House to the northwest, the Parramatta River, near Marsden Street north of the site, Church Street Plaza (near Macquarie Street) north of the site and from the western side of Lancer Barracks in Smith Street, to the east of the site and from the Church Street plaza. The photomontages showing “before” and “after” views of the proposed development are included in the Visual Impact Assessment attached at **Appendix N**.

Whilst it is acknowledged the proposed tower will have visual impact from closer viewing distances, it is intended as a landmark building and so should be seen, provided it does not obstruct primary view corridors. It is important to note that new high-rise tower buildings and planned future tower buildings in nearby locations will significantly change the existing cityscape around the site. The proposed tower will be subsumed into this future taller building skyline, from most viewing locations.

## Visual Impact View 2 From Old Government House looking southeast



The photomontage at left illustrates visual impact from in front of Old Government House, Parramatta Park, looking to the southeast. The proposal, while visible from Old Government House, is subsumed into the background city skyline view behind a treed parkland setting, which defines the setting of Old Government House.



## Visual Impact View 3 From Parramatta River & Marsden Street Bridge, looking south



The photomontage at left illustrates visual impact from the Parramatta River Marsden Street Bridge, looking south, again comparing the exhibited and revised tower envelopes. There are few locations along the River where the proposal can be seen and due to separation distance and the screening effect of intervening buildings - visual impact is minor.

Whilst the proposed tower, due to its height, will be evident in the existing skyline in this view, it is intended as a landmark building and so should be seen. As is the case with View 1, from west of the site, the above view will be significantly changed in the future as new towers more than 100 metres in height are developed in the Civic Precinct to the left of the proposed tower, in the above view. The proposed tower will be subsumed into this future taller building skyline.

## Visual Impact View 4 From Church Street looking south



The photomontage at left illustrates how the revised envelopes would appear as viewed looking south from Church Street. Like the Walker Tower currently under construction, taller towers at close and middle distance locations will be clearly evident in the view. The eastern side of the revised envelope will align with the eastern elevation of future towers in Church Street, north of Macquarie Street

Separation distance ensures that the proposed tower does not have an overbearing visual relationship to Church Street Plaza. The tower will add visual interest to this setting, providing a city centre context for the Plaza, whilst retaining the existing low-rise urban form around the edges of the Plaza. Visual impact as viewed from the Church Street Plaza, will be similar to that which will occur when future high-rise buildings are developed in nearby Civic Place. These future towers will be readily in southeast views from the Plaza.

## Visual Impact View 5 (From Smith Street, adjoining the Lancer Barracks, looking northwest)



The photomontage at left shows the approved tower envelope and the exhibited modified tower envelope looking northwest from near Lancer Barracks. As the revised envelope has narrower eastern elevation, its visual impact in this view corridor, compared to the approved envelope, is modest, with the additional height complementing the nearby high-rise towers in Parramatta Square.

## Visual Impact View 6 View from south of the intersection of Great Western Highway & Church Street southeast of the site, looking north.



The photomontage at left shows a comparison of the approved tower envelope, the exhibited envelope and the revised envelope, looking north from Church Street, south of the site. The proposal will in the future appear as the southern “bookend” to future tall towers that will be developed on the western side of Church Street, north of the site. Moving the tower further west provides substantial separation distance to towers on the eastern side of Church Street.

From the longer distance viewing locations in and adjoining the Parramatta CBD, the proposal will have a limited visual impact, particularly having regard to future high-rise development planned for the CBD. As new tower buildings are developed in the Parramatta CBD over the next decade, the future tower on the Westfield site will increasingly blend into the new skyline. This is illustrated in 3D diagram at **Figure 14**, on Page 65.

At closer viewing positions of less than 200 metres, the proposed tower will be clearly evident in the cityscape. This is unavoidable for any major building and is not an unreasonable outcome in the context of a major CBD. Importantly the revised tower envelope location does not obstruct any heritage view lines, or other key view corridors.

As the tower component of the project is for concept approval only, details of external building materials, finishes and colours will be determined at a later stage, following a design competition. Strong or dark colours and reflective finishes should be avoided in order to reduce visual impact associated with a tower building that has a relatively large floor plate.

The proposed office tower has been designed to provide floor plates suitable for major private sector businesses and government agencies. While the tower will therefore appear much larger than the typical residential towers in the locality, it will be compatible with the more contemporary larger floorplate commercial buildings now being developed in the Parramatta CBD, such as the nearby Walker tower in Parramatta Square. Reducing floorplate size to reduce visual impact would result in an office building that does not meet modern major tenant and hence render the project unviable.

Having regard to the nature of existing development on the site, the high rise CBD context and anticipated new high rise development near the site, it is considered that there will be no unacceptable visual impacts as viewed from the public domain and other locations in the CBD. The Parramatta City Centre DCP places priority on identified strategic view corridors. The proposal does not impact on any of the identified view corridors. View impacts are considered in more detail in Section 6.3 in the assessment of amenity impacts of the development.

#### 6.2.5 Building Envelopes – Siting and Layout Options

The Modification proposal, as exhibited located the office tower envelope as a termination of the view corridor south, down Church Street towards St Johns Cathedral and Westfield Parramatta. Feedback from NSW State Government agencies and Parramatta Council indicated that this location was not acceptable, and the tower envelope should be moved further west and outside the 40mwide heritage view corridor extending south along Church Street to the Cathedral.

The Modification, as revised, provides for relocation of the office tower envelope 42m further west, to the southeast corner of Argyle Street and Marsden Street. This location places the building envelope outside the heritage view corridor and aligns the future office tower with future tower buildings on the western side of Church Street and eastern side of Marsden Street, north of the site.

As noted in Section 6.2 of the Environmental Assessment Report, the Urban Design Analysis identifies 2 potential configurations – an east-west tower orientation, with the long elevation fronting Argyle Street (Option 1) and a north-south tower orientation, with the long elevation fronting Marsden Street. The Analysis indicates Option 1 offers a superior urban design and functional outcome. This siting option has appropriately been adopted as the preferred location and configuration of the tower building envelope.

#### 6.2.6 Design Excellence Provisions of PLEP 2011

Clause 6.12 of PLEP 2011 requires that consent not be granted to a development proposing a building that will be higher than 55m above existing ground level or have a capital value of more than \$100 million, unless in the opinion of the consent authority the proposed development exhibits design excellence. Design excellence is not defined, however subclause 6.12(4) does list a range of matters that a consent authority must have regard to when determining whether a proposal exhibits design excellence. These matters are detailed as follows:

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whether a high standard of architectural design, materials and detailing appropriate to the building type and location will be achieved,

whether the form and external appearance of the proposed development will improve the quality and amenity of the public domain,

whether the development detrimentally impacts on view corridors,

whether the development detrimentally impacts on land protected by a solar access controls established in the Parramatta Development Control Plan,

the requirements of the Parramatta Development Control Plan,

how the proposed development addresses the following matters:

- (i) *the suitability of the land for development,*
- (ii) *existing and proposed uses and use mix,*
- (iii) *heritage and archaeological issues and streetscape constraints,*
- (iv) *the relationship of the development with other development (existing or proposed) on the same site or on neighbouring sites in terms of separation, setbacks, amenity and urban form,,*
- (v) *bulk, massing and modulation of buildings,*
- (vi) *street frontage heights,*
- (vii) *environmental impacts such as sustainable design, overshadowing, wind and reflectivity,*
- (viii) *the achievement of the principles of ecologically sustainable development,*
- (ix) *pedestrian, cycle, vehicular and service access, circulation and requirements,*
- (x) *the impact on, and any proposed improvements to the public domain,*

The above listed matters are addressed “in principle” the Urban Design Report and relevant sections of this Environmental Assessment Report, in relation to the proposed tower building envelope. The design of the tower would be subject to a design excellence process.

The reference design demonstrates that a high standard of architectural design, materials and detailing can be achieved and that the built form exhibits appropriate bulk, massing, modulation and street frontage heights compatible with the context of the site and the emerging high-rise character of the Parramatta CBD.

The proposal will have no adverse impact on identified view corridors or sun access planes. There are no DCP special character statements relevant to the subject site. Due regard has been had to the principles of ecologically sustainable development, solar access, wind, reflectivity and vehicular and pedestrian access. T

The development will include public domain and façade improvements. The subject land is not located in a Special Area and will have no adverse impact on any nearby identified special areas such as City West located west of O'Connell Street, or the Church Street shopping strip, located north of the railway line.

The matters outlined in subclause 6.12(4) of PLEP 2011 are addressed in more detail elsewhere in this Environmental Assessment Report and in the Urban Design Report. The reference design has been developed in recognition of the constraints and opportunities of the site and its context and the design issues identified in subclause 6.12(4).

The proposed commercial office use of the proposed tower is appropriate for the site and its zoning and its intended function to serve the needs of major office tenants requiring large floorplates.

As required by clause 6.12 of PLEP 2011, the future office tower design will be the subject of a design competition conducted in accordance with Parramatta Council's Design Excellence Policy, prior to the preparation and submission of a development application 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 Sun Eye Shadow Studies and Shadow Diagrams, at hourly intervals between 9am and 3pm for the winter solstice for the proposed modification are included in the Urban Design Report attached at **Appendix B**. The shadow diagrams include a comparison with the shadows cast by the previous office tower envelope, as exhibited.

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

Almost half of the mid-winter shadows cast by the proposed office tower envelope, as modified, 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. The shadows take between half and hour and 1 hour to pass across each residential property to the south, depending on the width of those properties, leaving solar access unaffected for the balance of the day.

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. Shadows commence impacting on the heritage item at 45 Campbell Street after 1.15pm, with ample solar access maintained before 1.30pm. Other heritage items in the locality are unaffected by shadows from the proposed building envelope. The proposal has no shadow impacts on sun protected public spaces during the nominated hours in mid-winter. In the morning

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 between 9am and 3pm, generally limited to 2.25 hours, after 12.45pm 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 proposed office tower envelope, as modified, has less shadow impact on the mixed-use buildings at No's 114 & 118 Church Street, compared to the office tower envelope as originally approved and the modified tower envelope proposal as previously exhibited, because of relocation of the tower further west. Between 9am & 3pm in mid-winter, shadow impacts on No's 114 and. 118 Church Street are limited to a 15 minute period from. 2.45pm to 3pm, confined to the west facing living room glazing in the southwest corners of the buildings. The affected apartments will receive 2 hours mid-winter solar access from 12.45pm to 2.45pm.

The proposed office tower envelope, as modified has no shadow impacts on the apartment building at 140 Church Street, offering an improved solar access outcome compared to the originally approved and the modified tower envelope proposal, as previously exhibited.

Residential properties to the southwest of the proposed office tower envelope, located to the west of Marsden Street are impacted by shadows for up to 1 hour between 9am and 10.45am, as the shadow passes across those properties. However, these properties will retain well in excess of 2 hours min-winter solar access.

While neighbouring and nearby residential properties will retain at least 2 hours solar access, in the longer term as further high-rise development occurs in the Parramatta CBD, many residential properties will not achieve 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. Taller residential buildings near the site enjoy expansive district views, which are a higher priority for residential amenity.

#### 6.3.2 ACOUSTIC PRIVACY

A Preliminary 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.

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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 well 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 7.30pm 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. A separation distance of more than 100 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 indicates that the proposal will be subsumed into the emerging high-rise character of the Parramatta CBD.

The modest north-south depth of the proposed envelope (45.435m) and ample separation distance ensures that district views to the west from residential properties located to the east of the site, as well as district views to the east from residential properties to the west of the site, are minimally impacted.

Views from residential properties located to the south of the site are predominantly towards existing high rise buildings in the Parramatta CBD, which in combination with separation distance from the proposed tower, ensures that the building will be subsumed into CBD skyline rather than form a material obstruction to such views.

Views from the properties located to the north of the site are predominantly from commercial buildings, or residential towers that are a substantial distance from the proposed tower. Most of the existing district views to the south will be retained either side of the proposed tower. It should be noted that views cannot be guaranteed within a high-rise CBD environment and 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 more high-rise towers in the locality.

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 are less applicable in a high-rise CBD context, where view impacts are traditionally given much less weight. Notwithstanding this there will be no unacceptable view impacts as viewed from residential properties in the locality and any such impacts are not materially greater 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, as addressed in the view and visual impact analysis attached at **Appendix L**.

#### 6.3.5 VISUAL IMPACT

A detailed visual impact analysis of the proposed building envelope, as modified is included in the Visual Impact Assessment (VIA) attached at **Appendix L**. The VIA 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 also addressed in more detail in Section 6.2.4 of this EA Report.

#### 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 and Marsden Streets 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 6m tower setback to Argyle and Marsden Streets, above the existing podium will result in wind conditions that will not be materially different to current wind conditions experienced along these streets 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 podium 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 and/or awnings along the tower perimeters can be provided for in the design of the tower when a 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/Marsden Street frontages and on the proposed Level 6 podium 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 attached at **Appendix N**. This assessment also compares the visual impact of the proposal, as modified, with the view impact of the office tower envelope as originally approved. Visual impact on key view corridors is also addressed in 6.2.4 of this EA Report.



The analysis finds that visual impact from the nominated vantage points is modest and acceptable, having regard to the emerging high-rise context of the site and are not materially greater than visual impacts arising from the development, as originally approved. The analysis also finds that the visual impact on the heritage view corridor extending south down Church Street to St Johns Cathedral is significantly less in the revised proposal compared to the location further east in the Modification, as previously exhibited.

At closer viewing distances the proposed office tower will be clearly evident in the view. However, the visual impact is commensurate with other large commercial towers either recently constructed or under construction. While it is acknowledged that the proposed envelope is materially higher than the approved envelope, increased tower heights are a feature of development in the Parramatta CBD over the last 5 to 10 years and this form of development will be encouraged by the increased heights and FSR proposed in Draft Parramatta LEP 2016.

At longer viewing distances the upper portion of the tower, though visible, will become a visually compatible feature within the CBD skyline as more and more high-rise towers are developed. Like the Walker Tower currently under construction, and the other taller towers within the CBD, the proposed future tower will feature as a landmark building consistent with the design objective of providing a prestige A Grade office tower.

The proposal, as modified, has an appropriate and acceptable visual impact, having regard to the function of the building as a high-rise office tower within the emerging context of a major high-rise metropolitan CBD.

## **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 and Traffic Assessment 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 Assessment is attached at **Appendix K**. The CBRK Report 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 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 building envelope, as proposed, will also result in a some reduction in retail floor space within the existing retail podium, below the tower envelope to accommodate structural changes within the podium.

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 small net reduction in retail GLA resulting in a minor reduction in retail traffic generation. Given there will be no increase in car parking for the office tower envelope and there will be a small reduction in retail floor space, overall there is likely to be 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 removal of 120 retail car spaces above the David Jones Department Store. The existing approval provides for a net increase of 562 car spaces. After allowing for a reduction in 120 existing car spaces above the Department Store and the addition of 2 basement parking levels below the retail podium to provide 100 car spaces for the office tower, the net increase in car parking will reduce from 562 car spaces, as approved, to 542 car spaces, as modified. It is proposed that Concept Approval be amended to prescribe a maximum of 542 additional car spaces, comprising 100 office tower parking spaces and 442 retail parking spaces.

Car parking requirements are set out in clause 7.3 of Parramatta LEP 2011 and prescribe maximum, rather than minimum parking rates 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 100m<sup>2</sup> of commercial GFA and a maximum of 1 car space per 30m<sup>2</sup> 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.

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 4,890 car spaces for retail activity on the site and 100 car spaces for the office tower.

CBRK have calculated the 85<sup>th</sup> percentile parking demand for the shopping centre and advise that this parking demand equates to 1 car space per 34m<sup>2</sup> GLA. Assessed at this rate of would require a total retail parking provision of some 4,690 car space, which is satisfied 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 approved. Accordingly, there will be no increased impacts on the nominated key intersections. Accordingly, no further traffic analysis is warranted and it is clearly evident that there would be no increase in traffic on the road network and at key intersections, arising from the proposed modification.

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 has been completed and the remaining works may also be completed in the near future and before 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*

At ground level the existing northern wall of the retail podium provides a 3m front setback to Argyle Street, behind the existing colonnade, effectively providing an additional 3m of footpath width for pedestrians in Argyle Street.

The Indicative Concept Plans have removed previously proposed outdoor dining and street furniture below the colonnade, leaving this space free for pedestrian movement. Consequently, 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 on the southern side of Argyle Street 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.

It has been suggested that pedestrian traffic counts be undertaken to provide an update on earlier pedestrian traffic counts that have been relied upon for the assessment of impacts on pedestrian flows in Argyle Street. Given the situation over the last 6 months with restrictions relating to COVID 19, current levels of pedestrian traffic in Argyle Street would significantly underestimate pedestrian traffic flows that would otherwise have occurred. Accordingly, reliance on the previous counts/estimates is considered appropriate.

#### *Bicycle and Motor Cycle Parking Provision*

CBRK advise that bicycle parking is required at the rate of 1 space per 200m<sup>2</sup> of office and retail floor space and 1 motor cycle parking space per 50 car parking spaces. CBRK indicate that 550 bicycle parking spaces and 17 motorcycle parking spaces are required for the office tower.

The provision of the required bicycle and motorcycle 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 light rail stop to be constructed north of Parramatta Square. Convenient and safe pedestrian access to public transport will be available via Argyle 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.

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### Transport Management and Accessibility Plan

CBRK's traffic impact assessment reveals that there will be a minor reduction in traffic generation from the proposed development, as modified. The net amount of additional parking will be reduced from 562 car spaces to 542 car spaces, which will increase incentives to utilise public transport and reduce car dependency.

A Draft Transport Management and Accessibility Plan (TMAP) is included with the Traffic and Parking Report attached at **Appendix K**. This TMAP can be further developed as part of the preparation of the DA for the office tower to take account of changes to public transport, the road network and final office tower design.

### 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.

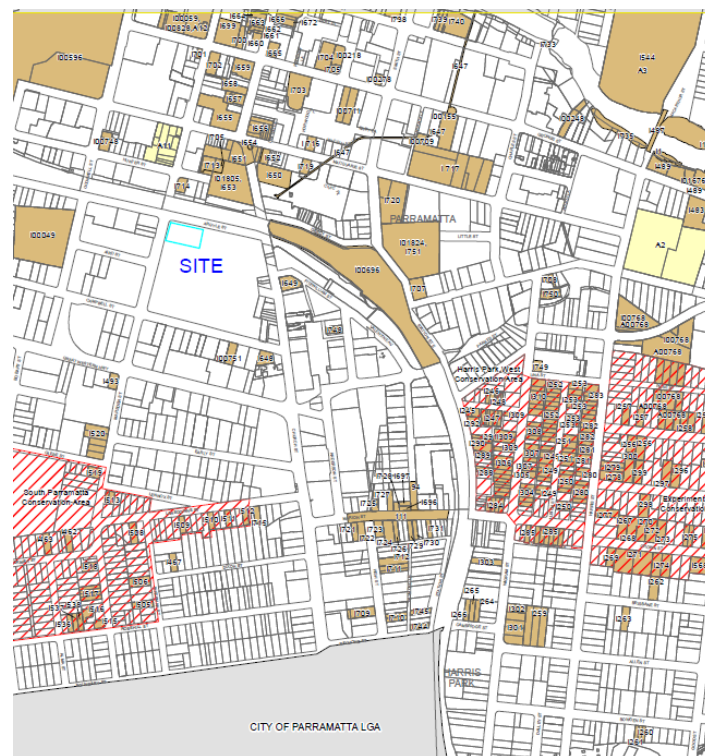
## 6.6 Heritage

*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. However, there are 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, St John's Cemetery in O'Connell Street and St Johns Cathedral in Church Street. Map No. 9 on page 84 shows the location of nearby heritage items.

A Heritage Impact Statement (HIS) has been prepared by heritage consultants, URBIS. A copy of this HIS 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 within 300m of the site and view lines to and from key heritage items. The HIS finds that the proposal will not have any material adverse impacts on heritage items or heritage view lines and supports relocation of the office tower envelope further west so that the building is clear of the heritage view corridor extending south along Church Street to St Johns Cathedral.

Map No 9 - Parramatta LEP 2011 – Heritage Map Extract



With respect to Old Government House and Domain, located in Parramatta Park, this heritage item is located more than 500 metres northwest of the proposed development and forms part of the World heritage listed cultural property known as Australian Convict Sites and is included in the national Heritage List.

The HIS also considers potential impacts on the heritage values of Old Government House in Parramatta Park, including the vista from this important heritage item. 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 HIS finds that the proposal will not adversely impact on the heritage values of and vistas to and from Old Government House. Consultations have commenced with the Commonwealth Environmental Assessments Branch and it is unlikely that the proposal will require formal assessment and approval under the *Environmental Protection and Biodiversity Conservation Act*.

With respect to historic views and views corridors identified in the DCP, the HIS concludes that the modification is compliant with the DCP in terms of satisfactorily maintaining these historic views and view corridors.

## 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 provides a description of Council's desired public domain improvements for the Parramatta City Centre. 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 prior to submission of a DA for the office tower.

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 and a portion of Marsden Street, east side at the corner of Argyle Street. Works proposed to the Argyle and Marsden Street frontages include retail display windows, a café and outdoor seating, pavement and landscaping improvements, cladding of columns and soffit and additional lighting. .

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 (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 proposed modification will introduce an additional major pedestrian entry at the southeast corner of Argyle Street and Marsden Street.

The Parramatta City Centre Civic Improvement Plan (CIP) provides a description of civic improvements needed to support the growth and development of the Parramatta CBD. Proposed works are to be funded in part by Section 7.12 levies collected from developers. Projects of relevance to Westfield Parramatta include the following:

- 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.
- Reinforce Great Western Highway and Parkes Street as an east-west ring road and gateway to the City Centre.
- 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.

The above projects have been considered in preparing concepts for improvement of the public domain around the Westfield Parramatta shopping centre and connections to the shopping centre. A concept plan 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 and floor plate size, and will assist in addressing the current significant undersupply of A Grade large floorplate 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 739,406m<sup>2</sup>) 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 2,000m<sup>2</sup>) office space is 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 2,450m<sup>2</sup> is more appropriate for the current demand in the market, compared to the 1,400m<sup>2</sup> floor plate provided for in the office tower, as originally approved.

Major tenants are typically looking for office spaces of between 15,000m<sup>2</sup> to 30,000m<sup>2</sup>, with some seeking spaces as large as 70,000m<sup>2</sup>. An A Grade office tower of 100,000m<sup>2</sup> NLA s 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 large Walker officer tower under construction in Parramatta Square. This significant 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, and was then subject to a 1,400m<sup>2</sup> limit on floor plate size.

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 P**. 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, as required by PDGP 2011, 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 network, 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>	Detailed commissioning of the building's mechanical, electrical and hydraulic system to ensure efficient operation A 12 month building tuning process to optimise the systems through differing weather events and occupancy rates.
<i>Construction Practices</i>	A comprehensive environmental management plan will be implemented to minimise the impact on the immediate environment 80% of construction waste will be either reused or recycled Construction energy and water consumption will be monitored to minimised wastage.
<i>Materials Selection</i>	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 PVC and timber will be sourced from lower environmental impact manufacturing and plantation A Life Cycle Assessment of the building's environmental impacts will be conducted to assess the operation for replacing materials to reduce impact.

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>	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 After project handover all building systems will be continuously tuned and monitored to ensure efficient operation A building users' guide will be provided to the building operator and the occupants to explain the correct management of the building.
<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"> <li>o Lighting types and maximum power allowances</li> <li>o General equipment maximum power allowances</li> <li>o Requirements for lighting and equipment controls</li> <li>o Materials usage guidelines for reduced embodied energy</li> <li>o Waste reduction techniques and requirements</li> </ul>

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 7.12 Contributions Plan 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 \$400 million for the office tower, as proposed to be modified, a S7.12 levy of \$12 million is payable to Parramatta City Council, prior to release of the CC for the office tower. This is approximately 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 on 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**. 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.

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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 and Modification Exhibition**

*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. 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 original Modification. A copy of Elton Consulting Community Consultation Report (CCCR), including a copy of the information flyer and display panels is attached at **Appendix M**. The CCCR 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 12<sup>th</sup>, 13<sup>th</sup> and 14<sup>th</sup> 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 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 the then 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.

The proponent has consulted with Parramatta Council during preparation of the original Environmental Assessment and the revised 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 for the original Modification proposal was publicly exhibited in September 2018 through to 2<sup>nd</sup> October 2018 and adjoining and nearby landowners notified of the proposal in accordance with the requirements of the NSW Planning. The EA Report and supporting material, including plans, was displayed at the offices of Council and NSW Planning, and at Westfield Parramatta Shopping Centre.

**Appendix Z** contains a table summarising the submissions received to the exhibition of the original Modification proposal and the proponent's response to those submissions. The revised Modification proposal directly arises from consideration of feedback received from the exhibition of the original Modification proposal.

The revised Modification relocates the tower 42m further to the west, clear of the heritage view corridor to St Johns Cathedral and the tower envelope and reference design provide for some reduction in total GFA and a material increase in the articulation zone, providing for reduced building bulk, as height increases.

The proponent acknowledges that arising from the change in location of the office tower location 42m to the west, it is expected that DPI&E will require re-exhibition of the Modification, in the revised form, now resubmitted. This will provide an opportunity for further consultation and input from government agencies, Parramatta Council, the local community, landowners and other interested persons including businesses, organisations and those working in the area.

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## 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 AS2601:2001 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 domain	Council	A Public Domain Improvement Plan will be prepared, finalised

ISSUE	COMMITMENT	APPROVAL AUTHORITY	TIMING
	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 (TfNSW)	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 & NSW Department of Transport (TfNSW)	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 Construction Management Plan will be prepared for submission with the DA for the office tower. 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. There may be other opportunities for commercial and/or residential towers elsewhere within the Westfield Site. However, no consideration has been given to any other major development of the site. In these circumstances, a master plan would be both inappropriate and speculative where no other future works are envisaged or likely.

### 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 relocation of the office tower, further west of the exhibited Modification proposal addresses Council's concerns relating to tower location and relationship to Church Street. Further consultation with Council has been undertaken and the broad support of Council obtained for the location now proposed at the southeast corner of Argyle and Marsden Street.

Opportunities to provide a larger office tower in the location originally approved at the corner of Church Street and Argyle Street have indicated that such an option is not feasible without wholesale demolition of the existing retail podium in this location. It is also our understanding that Council prefers the location now proposed, rather than location as originally approved, for a tower of the scale and height now proposed. the original 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.

The reference design provides for a lift/services core of modest width on the western elevation of the building, with articulation either side of the core. This is the optimal location of the lift/services core. Suitable architectural treatments and materials can be used to ensure that the western elevation of the lift/services core achieves a satisfactory aesthetic outcome. Appropriate solutions will be further explored during the design excellence process that occurs when building designs are prepared for the Project/Development 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.*

The above comments in relation to building form are no longer applicable as the tower building envelope location has been relocated away from Church Street. The tower building envelope sits on the retail podium below and provides an appropriate presentation to the southeast corner of Argyle and Marsden Streets. The reference design does not include an additional podium above the existing retail podium.

### 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 GBA ranges from 2,228m<sup>2</sup> up to 2,865m<sup>2</sup> to provide for increasing building articulation as height increases. The average GBA is close to Council's expectations and suitably responds to floorplate area requirements for major tenants. 85% of office floor space is within 12m of a source of daylight.

## 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 of 6m are provided to Argyle Street and Marsden Street in accordance with Council's request above.

## 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. The Urban Design Report includes consideration of neighbouring development, existing and proposed.

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 within convenient walking distance 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 Modification Application includes 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 provide an appropriate lobby width at ground floor level and also include provision for retail/café tenancies on the ground floor level, fronting Argyle Street and Marsden 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 minimise the crossing distance.
- 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 between Church Street and Marsden Street and along the eastern side of Marsden Street to the existing nearby pedestrian overbridge in Marsden 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 \$9 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 and located to ensure there is no material mid-winter overshadowing of Jubilee Park between the hours of 12 noon to 2pm. The Environmental Assessment includes consideration of airspace issues.

Street activation plans are included with the concept plans. Detailed plans of proposed street activation will form part of the DA 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 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. Further meetings have been held with Council since exhibition of the original Modification proposal.

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 is not materially compromised, now that the building envelope has been moved 42m to the west outside the 40m wide heritage view corridor.



The revised Modification also complies with Council indicated a preference for a 6m setback to street frontages to Argyle Street. Council has acknowledged that the existing 3m wide 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. The design excellence process is the appropriate means of determining final architectural form and presentation.

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 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.

The revised Modification proposal has been prepared in consultation with Council and exhibition of the original proposal and Council's concerns taken on board and addressed. This further consultation has proven worthwhile and resulted in an improved urban design and heritage outcome

## 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 site has appropriately been identified in Council's Draft Parramatta LEP 2016 for a substantial increase in maximum building height and FSR. The proposal is consistent with the proposed new planning controls and provides a suitable location for a major office tower, in the form proposed.

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 large floorplate 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 21<sup>st</sup> century.

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 to the west, in the revised location, retains accessibility to public transport and the primary commercial core area of the Parramatta CBD. Construction is feasible in this location, as the existing David Jones 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 façade and active frontage to Argyle and Marsden Streets and enhanced public domain. The proposal, as modified in its revised location, 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. Importantly, the revised tower location is located outside the Church Street heritage view corridor to St Johns Cathedral.

The development, as revised, 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.

Traffic impact assessment indicates that the proposed office tower will have minimal, if any impact on the surrounding road network, compared to the office tower form, as originally approved. 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 currently receiving at least 2 hours mid-winter solar access will continue to 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 large floorplate 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 large floor plate office towers, it is considered that the proposed tower envelope, as modified, is appropriately located and provides for a future prestige office tower of high quality design developed through a design excellence process.

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 revised office tower building envelope modification, submitted under S75W is worthy of approval.