



Our Ref: 17124

26th October 2020

The Director
Key Sites Assessments
Department of Planning Industry & Environment
Locked Bag 5022
PARRAMATTA NSW 2124

Attention David Glasgow

Dear Sir

Re: Modification to the Approved Concept Plan for Westfield Shopping Centre Parramatta (MP10_0068 (CP) MOD 1) - Office Tower Building Envelope

We write in response to your correspondence dated 29th October 2018 advising of completion of exhibition of the above modification to the approved office tower building envelope (MOD1 to the Concept Plan Approval for MP10_0068) and submissions received by NSW Planning Industry and Environment (DPI&E) arising from that exhibition.

We note that DPI&E is not satisfied with the proposal, as exhibited, and requires further consideration be given to built form, heritage, pedestrian and transport impacts. DPI&E further advises that having regard to the issues raised in submissions, the proponent should undertake further consultation with Parramatta City Council and Transport for NSW.

The proponent has given careful consideration to the issues raised in submissions and undertaken further consultation with DPI&E, Parramatta City Council, Transport for NSW, the Government Architect's office and the Office of Environment and Heritage. Revised office tower building envelope plans have been prepared in consultation with those government departments and agencies, addressing the key issues that have been raised in Schedule 1 of your correspondence of 29th October 2018. Additional information is also provided in accordance with your request for additional information, as outlined in Schedule 2 of your correspondence.

The revised commercial tower building envelope plans provide for relocation of the tower building envelope some 42m further to the west, a reduction in maximum gross floor area from 112,000m² to 105,000m², with GFA limited to a maximum of 70% of the building envelope and provision of a 2 level basement car park. We are confident that the revised plans suitably address the built-form and urban design issues that have been raised with respect to the exhibited plans.

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The key issues raised by DPI&E are identified and addressed, as follows.

KEY ISSUES

Built Form

- *The Secretary's Environmental Assessment Requirements (SEARs) issued 29 September 2017 included a requirement for identification and analysis of alternatives for the proposed commercial floorspace. The Department does not consider this requirement has been adequately addressed. Detailed analysis of alternatives for the tower location, and subsequent environmental effects, including impacts on townscape, views, heritage and neighbouring amenity, as well as constraints and opportunities for street level activation should be undertaken, clearly demonstrating the urban design rationale for the proposed tower location.*
- *Notwithstanding the above requirement, having regard to the advice of the Government Architect NSW and concerns of the Heritage Council of NSW and Parramatta City Council, the Department recommends the proposed tower location and scale be reconsidered. The Department is concerned that the proposed tower location, terminating the view south along Church Street would dominate the Church Street vista and demonstrably harm the protected view of St Johns Church. The Department also considers the proposed scale of the building envelope is questionable, noting it is far greater than surrounding buildings and the combination of the proposed height and floorplate results in an unrelieved bulk and massing, out of character with the scale and grain of the surrounding area.*
- *In light of this, the Department recommends the location of the tower, quantum of floor space and proposed building envelope be reviewed, in accordance with the advice provided by the Government Architect NSW. Any revised proposal should also be supported by draft design parameters showing how a future building could be sufficiently articulated to address the bulk of the proposed envelope.*

Response

The original Modification to the approved tower envelope was prepared on the understanding that the heritage view south, to St Johns Church terminated at the Church. It has subsequently been determined that the agencies and authorities referred to above, require that the vista behind St Johns Church to the south, for a width of at least 40m, remain as existing, namely a view of the skyline behind the Church. The Council has also advised that it prefers that the eastern elevation of the tower envelope align with the 12m minimum tower front setback proposed for Church Street (western side), north of Macquarie Street.



The revised commercial tower envelope moves the envelope at least 42m further to the west, outside the 40m wide view corridor to St Johns Church. The revised location also aligns the eastern elevation of the tower envelope with future towers on the western side of Church Street, north of Macquarie Street, where a 12m tower setback to Church Street is proposed. The revised tower envelope location addresses the tower envelope location objectives of the above listed agencies and authorities and protects the heritage view corridor south to and beyond St Johns Church.

In addition to the now rejected exhibited tower envelope location above the existing Myer Store, the revised Modification Urban Design Report includes an analysis of 2 alternative tower envelope locations at the northeast corner of Argyle Street and Marsden Street.

The first option, being the preferred option in the revised Modification, is an east-west configuration, optimising frontage to Argyle Street. The second option is a north-south configuration that maximises frontage to Marsden Street. A table is provided in the Urban Design Report comparing the issues and outcomes arising from each of these 2 options. It is considered that the east-west configuration offers a superior outcome in terms of urban design, amenity, functionality, connectivity/permeability, activated street frontage and development costs/feasibility.

A relatively substantial office tower envelope is required to accommodate the large office floor plates now required by major private and government sector tenants. The Modification, as exhibited, proposed a maximum GFA of 112,000m². This has been reduced to 105,000m² in the revised tower envelope.

After receipt of responses to the exhibition of the Modification, the proponent undertook further consultation with Parramatta City Council, the NSW Government Architect's Office, the heritage Council and NSW DofPIE with respect to the overall bulk of the office tower envelope and the extent of articulation that should be provided within the envelope. Agreement was reached that the revised Modification should include a reference design demonstrating appropriate building bulk and articulation, with gross floor area limited to a maximum of 70% of the commercial tower envelope.

The revised Modification proposes that future tower design comply with the following development indices.

- Maximum commercial tower height of RL 220
- Maximum gross building envelope area of 153,000m²
- Maximum gross building area of 123,000m²
- Maximum commercial gross floor area of 105,000m²
- Maximum gross floorplate area of 2,865m², with reduced floorplate areas on the middle and upper levels of the tower.



The above listed limits relating to building height, bulk, scale and articulation, can be addressed by way of inclusion of consent conditions in the Concept Approval.

Design Excellence

- *Provide a Design Excellence Framework to identify additional opportunities for a design review process, which incorporates the entire podium and public domain. The Framework should deliver a robust, coordinated and independent design excellence process, having regard to the advice of the Government Architect NSW.*

Response

Parramatta Council has indicated that its preference is to adopt the Council's Design Excellence Framework currently in place for major developments in the Parramatta CBD. The proponent has adopted this Design Excellence Framework, as outlined in the revised Urban Design Report.

The components of the Design Excellence Framework brief will include the tower reference design, the future planned upgrading of the existing shopping centre Argyle Street and Marsden Street podium facades, the potential rooftop retail/dining precinct linking the tower with the approved retail additions and public domain improvements around the site. The Design Competition comprising all these components would be completed in accordance with Parramatta Council's Design Excellence Guidelines, prior to preparation and submission of the development application.

Transport

- *Submit an updated Traffic and Transport Impact Assessment in accordance with the detailed requirements of the SEARs, noting also comments made in the submissions of TfNSW and Council.*
- *Provide an updated Transport Management and Accessibility Plan (TMAP) based on the revised Transport Impact Assessment, noting also comments made in the submissions of TfNSW and Council.*

Response

The Traffic and Transport Impact Assessment (TTIA) has been updated to address the revised commercial tower envelope and its location. The revised and updated TTIA includes an updated Transport Management Accessibility Plan (TMAP) that notes and addresses the submissions made by TfNSW and Parramatta Council. The total number of additional car spaces has been reduced from 562 to 542 car spaces.



Given that there is no increase in car parking for the office tower, there will be no increase in traffic impacts, compared to the concept plan, as originally approved. It has been suggested updated pedestrian traffic flows be provided for Argyle Street. Due to COVID-restrictions since March 2020, pedestrian flows in Argyle Street have decreased. Any updated pedestrian traffic counts in Argyle Street would therefore be inaccurate. The revised Traffic and Transport Impact Assessment demonstrates that increased pedestrian traffic can be satisfactorily accommodated by retaining the footpath area under the colonnade free of any obstructions, and wholly available for pedestrian movement.

Sustainability

- *The supporting documents indicate that over 80% of the floor area is within 12m of a natural light source, however this should be reviewed and demonstrated with properly scaled and measured drawings.*
- *Provide further consideration and examples of best practice sustainable building principles, to identify opportunities to improve the proposed environmental performance of the building with a view to demonstrating the potential to attain 6-star Greenstar rating.*

Response

It is not possible to provide more than 80% of office floor area within 12m of a natural light source in the case of larger office floorplates. In such cases office uses that do not require high levels of natural light can be located more than 12m from natural light sources. The Urban Design Report has been updated to include more detailed assessment of access to natural light. This assessment indicates that at least 70% of office floor area achieves a high level of access to natural light, with a further 15% achieving acceptable to good access to natural light.

A 6-star Greenstar rating is required for premium grade office floor space. There is no premium grade office floor space in Parramatta and more recent office tower developments, including major office towers in Parramatta Square have been approved with a 5-star Greenstar rating. Further, Council's DCP 2011 sets a standard of 5 Greenstars. The proposed office tower should not be singled out for different treatment with respect to Greenstar rating. A 5-star Greenstar rating is compliant with Parramatta DCP 2011 and is considered reasonable for the A Grade office market in Parramatta and consistent with Parramatta Council's current Greenstar standards with respect to A Grade office space.



ADDITIONAL INFORMATION

Full set of existing drawings & drawings for approval

- *Provide a full set of existing drawings and a full set of drawings for approval, including floorplans/elevations, containing only what is to be approved as part of this modification.*

Response

The proposed Modification relates only to the Concept Approval for the commercial tower envelope and 2 level basement parking. No approval is sought for specific floor plates or floor plans within the envelope, or other associated works such as podium façade upgrading. The reference design shows how a potential office tower could be developed within the proposed envelope.

While the reference design includes indicative floor plans and elevations, the tower reference design, potential future podium upgrades, possible future basement parking and potential future podium rooftop retail/dining facilities or public domain improvements do not form part of the Modification of the Concept Approval document. Future building development within the building envelope and supporting development, changes to the podium, public domain improvements etc would form part of a future staged DA for construction of the office tower.

A separate set of commercial tower envelope plans dated September 2020 for the Modification of the Concept Approval is provided for approval “stamping”. These envelope plans show only the location and setbacks of the commercial tower envelope above the existing retail podium, envelope setbacks and dimensions in plan view, as well as elevation plans, showing the extent of the envelope in the elevation views, including the basement parking levels and the maximum height RL.

Updated draft instrument of approval

- *Provide an updated draft Instrument of Approval referencing all plans to be approved, retained and/or superseded, and amendments to conditions and Statement of Commitments.*

Response

A draft instrument of approval is enclosed that references the commercial tower envelope plans that form part of the approval within the Schedule 2 list of conditions. In addition, the conditions listed in Schedule 3 have been updated, as has the Schedule 4 proponent’s Statement of Commitments.



Clarification of any impacts of the proposed modification on the project approval

- *Clarify any impacts of the proposed modification on the project approval, particularly in relation to future changes to lower floors, approved additional car parking spaces, and lower floor elevations.*

Response

The revised commercial office tower envelope will have no direct consequences for the existing project approval that has been issued for retail additions on Level 6. The maximum number of additional car spaces permitted (562) is proposed to be reduced to 542.

The Reference Design envisages allocating 100 of the additional car spaces for the planned office tower to a future 2 level basement car park under the retail podium, beneath the tower envelope. The Reference Design also identifies potential for retail and dining facilities located in the area between the tower envelope and the location of the approved, but not yet constructed, Level 6 retail additions.

Additional parking for the approved retail additions on Level 6 will be limited to a maximum of 442 car spaces. The proponent's revised Traffic and Parking Report includes a calculation of the number of car spaces to be removed and the number of car spaces to be accommodated in the 3 additional parking decks. This Report demonstrates that there will be a maximum of 442 additional car spaces for the approved Level 6 retail additions. The Draft Instrument of Approval has been amended to make it clear that additional parking is limited to a maximum of 442 car spaces for the retail component and 100 car spaces for the office component.

It is likely that a minor modification of the Project Approval for the Level 6 retail additions may be necessary to ensure a smooth transition between the approved retail additions and the potential retail/dining facilities connecting the Level 6 retail additions to the future office tower. Such Modification Application to the existing Project Approval would be lodged concurrently with a future development application for the office tower and associated works, including the potential for a future retail/dining facilities precinct connecting the office tower to the approved retail additions.

Clarify the proposed approval strategy, including future Development Applications

- *Clarify the proposed approval strategy, including future Development Applications and or, modifications to the project approval as necessary resulting from the proposed modification, particularly the impacts to lower floors and changes to the Argyle Street frontage, including the proposed staging of future applications.*



Response

Following issue of the Modified Concept Approval and completion of the Design Excellence Competition, a single staged development application (DA) would be prepared for the following works, to be completed over 6 stages:

- Stage 1 - Alterations to the existing retail podium below the tower to accommodate the office tower, including structural supports, floor layout reconfiguration and basement car parking (100 car spaces for the office tower, together with bicycle parking and end of trip facilities).
- Stage 2 - Construction of a commercial office tower above the retail podium, modified, as above.
- Stage 3 - Upgrading of the retail podium facade to Argyle Street, beneath the office tower and to Marsden Street (west side between Argyle Street and the existing pedestrian overbridge above Marsden Street).
- Stage 4 - Upgrading of the public domain, including new landscaping, street furniture and pavement finishes in Argyle Street, the intersection of Church Street and Argyle Street and in Marsden Street.
- Stage 5 - Development of a new retail/dining precinct on Level 6 between the office tower and the approved, yet to be constructed, Level 6 retail additions.
- Stage 6 - Upgrading of the existing Argyle Street retail podium facade, extending east from the office tower to Church Street, in conjunction with potential future reconfiguration of retail floor space fronting Argyle Street, within this portion of the podium.

Provide additional shadow diagrams & analysis with respect to 114 & 116 Church St.

- *Provide additional shadow diagrams an analysis which clearly demonstrate the available sunlight to 114 and 118 Church Street (before and after) and analysis of the impact to individual units with reference to the standards of the Apartment Design Guide and Parramatta DCP 2011.*

Response

The revised Urban Design Report includes a detailed shadow analysis. This shadow analysis indicates there will be minimal reduction in solar access to the residential towers at 114 and 118 Church Street between the hours 9am to 3pm in mid-winter. This is an improved solar access outcome compared to the previously exhibited location of the Modified tower envelope located to the east of the revised Modification envelope location.



Clarify the inclusion of 500m2 of retail on Level 6

- *Clarify the proposed inclusion of 500m2 of Retail GFA on level6. If additional retail floorspace is proposed as part of the modification, it must be clearly annotated on plan, included in the development description and justified within the EA. Otherwise all reference to increased retail GFA should be removed from the application documents.*

Response

The Modification Application is for the commercial tower envelope only, within the Concept Approval. No Concept Plan or Project Approval is sought for any additional retail or food premises on Level 6, nor is this potential future development included in the Concept Approval Modification Plans relating to the commercial tower envelope. Any potential future additional retail and dining facilities on Level 6 will be included in the staged DA for construction of the office tower.

The Environmental Assessment Report has been updated to address the revised modification, relocating the office tower envelope further west and providing for 2 levels of basement car parking. The revised modification now includes a Reference Design for a potential future office tower and the Urban Design Report, Heritage Impact Report, Visual Impact Assessment Report and the Traffic and Transport Report have also been revised. Other supporting reports have been updated to address the revised modification, generally by way of addendums or changes to text.

While the overall dimensions, including building height and potential gross floor area of the office tower building envelope remain substantially the same as the previously exhibited modification plans, given that the envelope location is now moved more than 40m to the west, to the southeast corner of Argyle Street and Marsden Street, it is anticipated that DPI&E will require re-exhibition of the modification application.

We would be pleased if you could review the revised Modification proposal and confirm its suitability for re-exhibition and the timeframe for such exhibition. We would appreciate if exhibition could be completed prior to the Christmas break. Should you require any further information, please contact the undersigned.

Yours faithfully

Nick Juradowitch
Director
Ingham Planning Pty Ltd