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Our ref: MP10\_0068 (CP) MOD 1

Mr Nick Juradowitch  
Lyndhurst, Suite 19  
303 Pacific Highway  
LINDFIELD NSW 2070

Dear Mr Juradowitch

**Modification to the Concept Plan for Westfield Shopping Centre Parramatta (MP10\_0068 (CP) MOD 1)**

The exhibition of the above modification request, including Environmental Assessment (EA) concluded on Tuesday 2 October 2018. All submissions received during the exhibition of the proposal are available on the Department's website:

[http://majorprojects.planning.nsw.gov.au/index.pl?action=view\\_job&job\\_id=7989](http://majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=7989)

The Department has considered the proposal as outlined in your application as well as the issues raised by Council, government agencies and in public submissions. The Department has also considered the advice of the Government Architect NSW, which is attached for your information.

The Department is not satisfied with the proposal as exhibited and requires further consideration be given to built form, heritage, pedestrian and transport impacts. These issues are further outlined in Schedule 1. Additional information and clarification is also required on a number of other matters outlined in Schedule 2.

In considering the issues raised, the Department recommends you undertake further consultation with Parramatta City Council and Transport for NSW.

Please note that the Office of Environment and Heritage (Environment Division) and Sydney Water are yet to provide a submission on the proposal. Once received, these will be forwarded for your consideration and response. The Department may also identify additional issues for consideration having regard to any subsequent submissions.

It would be appreciated if you could provide your response to the Department's key issues and all issues raised in submissions, within two months of the date of this letter.

Your contact officer, David Glasgow, can be contacted on 02 9274 1182 or via email at [David.glasgow@planning.gov.au](mailto:David.glasgow@planning.gov.au).

Yours sincerely



David McNamara 20.10.18  
**Director**  
**Key Sites Assessments**

## **SCHEDULE 1 – 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.

### **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.

### **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.

### **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.

## **SCHEDULE 2 – ADDITIONAL INFORMATION**

- 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.
- 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.
- 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.
- 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.
- Provide additional shadow diagrams and 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.
- Clarify the proposed inclusion of 500m<sup>2</sup> of Retail GFA on level 6. 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.