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Brendan Roberts
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By email: David.glasgow@planning.nsw.gov.au

Dear Mr Roberts

Section 75W Modification Request for Westfield Shopping Centre, 159 – 175 Church Street, Parramatta (MP 10_0068 MOD 1)

I refer to your correspondence dated 05 September 2018 seeking comments on the abovementioned development application modification. The Section 75W modification of the Concept Approval proposes to:

- Relocate and increase the approved commercial tower envelope;
- Increase the maximum building envelope height from 120 metres above ground level to 210 metres above ground level (approximately 41 storeys above the existing 5 storey podium);
- Increase the maximum commercial gross floor area from 35,000m² to 112,000m²; and
- Reduce car parking spaces from 562 to 289 spaces.

The Heritage Council previously commented on the approved concept plan in a letter dated 23 August 2013 and recommended that the height and bulk of the proposed tower be reduced. The recommendations also included conditions for the tower's finishing and signage.

It is noted that the subject property is not heritage listed, however it is near several heritage items listed on the State Heritage Register (SHR) and on the Schedule 5 of the *Parramatta Local Environmental Plan* (PLEP) 2011. The SHR items include:

- *St John's Anglican Cathedral* (SHR No. 01805);
- *Parramatta Railway Station* (SHR No. 00696);
- *Lennox House* (SHR No. 00751)

The subject site is also near the Old Government House and the Domain (OGHD) which is included on the National Heritage List and on UNESCO's World Heritage List.

UNESCO's heritage listing highlights the importance of the OGHD and its landscape setting to Australia's history. The listing provides justification for the protection and enhancement of the site and views to and from it. A technical report entitled *Development in Parramatta City and the Impact on Old Government House and Domain's World and National Heritage Listed Values* prepared by Planisphere (2012), identifies views from OGHD to the subject site as highly significant views. The report recommends that the built form in the City Central

precinct, which includes the subject site, when viewed from the OGHD, should not visually dominate the skyline over a broad area.

The proposed modification includes a substantial increase in the tower's height and bulk which would dominate the skyline and impact the significant views from World Heritage listed Old Government House and Domain.

The views to St John's Anglican Cathedral (Church) and Square from north is a protected view in the *Parramatta Development Control Plan 2011* and its significance lies in the historic main street approach to the city centre and views to the St John's Church. Any new developments are to align buildings to maximise and frame view corridors between buildings'. However, the proposed Westfield tower modification places it directly behind the Church which will dominate the historic views to the St John's Church, drastically reducing the historic prominence of the Church in its protected view.

Based on the above identified visual impacts, the proposed tower modification is not supported. However, if the proposed modification is approved, it is recommended that the following conditions are included as conditions of consent.

Commercial tower

The modified location, bulk and scale of the proposed tower needs to be revised to mitigate its adverse visual impact on the historic view corridors and setting of landmark heritage items in the vicinity, specifically, the historic views from the north to the state-listed St John's Cathedral and the town square in front.

Tower Materials, finishes and design resolution

The materials, finishes and design of the commercial tower elevations are to minimise the visual dominance and reflectivity of the tower in relation to St John's Cathedral and views from Old Government House and Domain.

Tower signage

External Westfield signage on the proposed tower structure should be located at lower levels and designed to minimise visibility from Old Government House and Domain.

If you have any questions regarding the above matter please contact Vibha Upadhyay, Senior Heritage Assessment Officer, at the Heritage Division, Office of the Environment and Heritage by telephone on 02 98738587 or email at vibha.upadhyay@environment.nsw.gov.au.

Yours sincerely



02/10/2018

Katrina Stankowski
A/Manager, Northern Region
Heritage Division
Office of Environment & Heritage
As delegate of the Heritage Council of NSW