

## Major Project MP10\_0068 Westfield Parramatta

### Concept Approval Modification 1 – Commercial Tower Building Envelope

#### Summary of Submissions to Exhibition and Response to Submissions

| SUBMISSION FROM                      | SUMMARY OF SUBMISSION  | RESPONSE TO SUBMISSION  |
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| Heritage Council of NSW (02/10/2018) | <p>The subject site is near several heritage items (St John's Anglican cathedral, Parramatta Railway Station &amp; Lenox House) and also near Old Government House &amp; the Domain (OGHD) which is included on the National Heritage List &amp; on UNESCO's World heritage List</p> <p>Views from OGHD to the subject site are identified as highly significant views and 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 proposal includes a substantial increase in the tower's height and bulk which would dominate the skyline and impact on the significant views from the World heritage listed Old Government House and Domain.</p> | <p>A revised Heritage Impact Statement (HIS) is included with the revised modification and considers the heritage impact of the proposed revised building envelope on heritage items in the vicinity of the site. This HIS concludes that the proposal, as revised has an acceptable impact on heritage items in the vicinity.</p> <p>The revised Visual Impact Assessment (VIA) and the revised HIS consider in detail the impact of views from OGHD to the exhibited and revised office tower envelope. These assessments find that the proposal has an acceptable visual impact on views from OGHD. In recent years views from OGHD have significantly changed as a result of several new high-rise towers being developed, with several other high-rise towers endorsed for development in the near future. The proposed office tower on the site, as revised, will merge into the emerging high-rise skyline of the Parramatta CBD, as viewed from OGHD.</p> |
|                                      | <p>The views to St John's Anglican Cathedral (Church) and Square from north is a protected view in the PDCP 2011 and its significance lies in the historic main street approach to the city centre and views to 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.</p>  | <p>The location of the proposed tower envelope has been revised, relocating the tower envelope 42m further to the west and clear of the 40m wide heritage view corridor that extends from the north, south along Church Street to St John's. As noted in the revised HIS, the revised envelope location will not dominate the historic view corridor. Comparative views have been provided showing the high-rise Walker Tower that has been approved adjacent the St John's and the adjoining public square. The proposed office tower envelope, as revised will have less visual impact on the Church and its setting within the nominated view corridors than the soon to be completed approved Walker tower.</p>   |

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|                               | <p>If the modification is approved in the modified location the 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 &amp; town square in front. The materials, finishes and design of commercial elevations are to minimize visual dominance and reflectivity of the tower in relation to St John's Cathedral and views from OGH. External Westfield signage on the proposed tower structure should be located at lower levels and designed to minimize visibility from OGH.</p> | <p>Relocation of the proposed tower further west, outside the view corridor ensures proposed bulk and scale does not unacceptably impact on the setting or view corridors of any heritage items. The proposal is for a building envelope only. Issues relating to selection of materials, finishes and reflectivity of elevations and the form and location of any signage would be addressed in the design excellence process as part of the preparation of development application plans for the future tower.</p>   |
| Transport for NSW (7/09/2018) | <p>There should be an assessment of the impacts on the pedestrian and public transport facilities, bus operation and pedestrian movements along Argyle Street, in consultation with Transport for NSW (TfNSW), with respect to the reduction of Argyle Street setback to zero (effectively zero with the introduction of the proposed outdoor seating along the promenade portion), relocation of the commercial office tower lobby and entry from Church Street to Argyle Street.</p>  | <p>The office tower envelope has been revised to provide a 6m setback to Argyle Street and retain the pedestrian promenade along Argyle Street in its existing form i.e. with no outdoor seating, street furniture, landscaping or bus stop infrastructure that would otherwise obstruct pedestrian flows along Argyle Street, or bus operations within Argyle Street.</p> <p>A revised Traffic and Transport Assessment (TTA) has been prepared identifying and addressing the issues raised by TfNSW.</p>  |
|                               | <p>TfNSW notes that the above outcomes are not consistent with Section 2.36 of the Traffic Management and Accessibility Plan (TMAP) which notes that Argyle Street will become a major pedestrian path between the office tower and the transport interchange (potentially doubling pedestrian flows in this section of Argyle Street compared to those set out in Council's Pedestrian Strategy and that retention of the promenade for pedestrian flows would enable the Argyle Street footpath to continue operating at LOS A.</p>   | <p>The amendment of the proposal to retain an undercover promenade at ground level in Argyle Street, free of any obstructions ensures that the free flow of pedestrian flows along Argyle Street is not obstructed and confirms there is adequate capacity to accommodate increased pedestrian flows in Argyle Street between Church Street and Marsden Street.</p> <p>The revised TTA includes a level of service analysis with respect to pedestrian movements in Argyle Street and estimates that existing peak pedestrian flows will increase from 1,000 to 2,200 per hour and concludes that the 6m pedestrian width available in Argyle Street accommodates a flow of 3,000 operating at LOS A. By retaining the full promenade width free</p> |

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|  |   | <p>of obstructions, as is now proposed in the revised modification LOS A is maintained.</p> <p>The revised TTA confirms that there will be a relatively minor and acceptable increase in crowding impacts at bus stops at the Argyle Street frontage. The revised modification retains the undercover promenade to Argyle Street.</p> <p>The retained promenade will continue to provide adequate weather protection for bus passengers during inclement weather.</p> |
|  | <p>TfNSW recommends as follows:</p> <ul style="list-style-type: none"> <li>* that details of pedestrian movements along Argyle Street with and without the proposed modification, effective footpath width without promenade portion and landscaping and street furniture for the existing bus layover directly outside the site.</li> <li>* Undertake a level of service analysis for pedestrian movements along Argyle Street without promenade portion considering the ongoing need for bus passengers, existing landscaping, proposed outdoor seating and street furniture along Argyle Street, ensuring the proposal does not impact on bus operations in Argyle Street and the level of service for pedestrian movements along Argyle Street is acceptable.</li> <li>* Assess additional footpath activity generated by the proposal and the potential for any future crowding impacts at bus stops at the Argyle Street frontage.</li> <li>* Consider providing undercover areas for bus passengers along Argyle Street with the loss of promenade area to the proposed outdoor seating area to minimize the crowding in the outdoor dining area.</li> </ul> | <p>As noted above the revised TTA assesses additional footpath activity and confirms that the Argyle Street footpath, in conjunction with the retained promenade (free of any obstructions) will continue to operate at LOS A.</p>  |
|  | <ul style="list-style-type: none"> <li>* Prior to any proposed changes to bus arrangements at the Argyle Street frontage and/or bus movements around the site, the applicant needs to consult and have agreement to such changes with TfNSW.</li> </ul>   | <p>No changes to bus arrangements at Argyle Street are proposed.</p>  |

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|  | <p>With respect to freight and servicing the applicant should provide a detailed assessment of forecast additional freight and service vehicle movements the modification is expected to generate, analyse these additional movements on the operation of existing loading docks and surrounding road network, to demonstrate that efficient and safe operations – particularly at the driveway access can be maintained and develop and provide detail on any mitigation measures (either infrastructure or operational management solutions) required to manage the additional demand.</p> | <p>The revised TTA includes a detailed assessment of forecast additional freight and service vehicle movements arising from the modification, with respect to the Marsden Street loading docks and confirms that the limited number of additional truck and van movements can be suitably accommodated without any material adverse impact on the operation of the loading docks and the efficient and safe operation of the driveway and Marsden Street, in the vicinity of the loading dock driveway access. Any internal changes to loading dock configuration and truck access thereto would be addressed in the future DA for the office tower, to ensure trucks suitably manoeuvre within the loading dock area.</p> |
|  | <p>With respect to construction pedestrian and traffic management it is requested that the applicant consults with RMS, City of Parramatta and Sydney Coordination Office and Parramatta Light Rail within TfNSW during preparation of the CPTMP.</p>  | <p>A Construction Pedestrian and Traffic Management Plan (CPTMP) will be prepared as part of the preparation of a development application for the tower and this CPTMP will be prepared in consultation with RMS, City of Parramatta and Sydney Coordination Office and Parramatta Light Rail within TfNSW.</p>  |
|  | <p>With respect to bicycle facilities it is requested that future development applications provide a separated bicycle facility in the proposed loading dock access making it safer and better connected for bicycle riders.</p>   | <p>The revised modification envisages that the office tower car parking and bicycle parking and end of trip facilities will be accommodated in a future 2 level basement to be constructed below the existing retail podium at the southeast corner of Argyle Street and Marsden Street with direct lift access to the office tower above.</p> <p>The basement bicycle parking and end of trip facilities will be separated from loading dock facilities and provided with separate access to avoid conflict with vehicle movements.</p>   |
| <p>Government Architect of NSW<br/>(16 October 2018)</p> | <p>The proposed relocation of the tower towards the west is generally supported as it preserves the scale and character of Church Street south of the railway. However, the proposed alignment with Church Street to the north is not supported. Framed by the Church St. corridor, the tower will be highly prominent from the north.</p>   | <p>The revised modification relocates the tower envelope 42m further to the west and clear of the 40m wide heritage view corridor that extends from the north, south along Church Street to St John's. The revised envelope location will not dominate the historic view corridor, having regard to existing and likely future high-rise</p>   |

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|  | <p>More significantly, it will dominate St Johns Church which is on axis with the Church St. corridor.</p> <p>Further consideration needs to be given to the overall scale and form of the tower. It fails to even meet a modest 6m setback from Argyle St which would have somewhat mitigated the scale impact on the street.</p> <p>There is little urban design justification for proposed changes to tower height and volume. The suggested “gateway” relationship with the Aspire tower is not convincing, given that tower development in the CBD is “clustered” rather than axial.</p> <p>The proposed GFA fully occupies the tower envelope leaving no articulation of built form. To maximise opportunity for design excellence there should be greater scope to vary the tower envelope and also provide for generously scaled internal areas as shown in the supporting images.</p> | <p>towers to be developed near St John’s Church.</p> <p>GFA of the proposed office tower has been reduced by some 7,000m<sup>2</sup> to a maximum of 105,000m<sup>2</sup>, which equates to 70% of the volume of the proposed building envelope, allowing for ample articulation of the future office tower. Tower setback has been increased to a complying 6m to Argyle Street and a complying 6m tower setback provided to Marsden Street.</p> <p>The revised tower envelope is located further from Church Street and the revised location further west allows the eastern side of the tower to align with tower setbacks to Church Street north of Macquarie Street, while the western elevation will align with tower setbacks to Marsden Street, north of the railway line reinforcing the street grid.</p> <p>Proposed tower height and GFA is consistent with height and GFA controls proposed for the site in the endorsed Draft LEP for the Parramatta CBD.</p> <p>The Urban Design analysis includes further consideration of height and volume in the Parramatta CBD context. Until recently the demand for large floor plate office towers has not been met, resulting in few major new office tenants coming to Parramatta (see JLL Report – Appendix E to the Environmental Assessment Report).</p> <p>The proposed office tower envelope is commensurate in height and scale with the nearby Walker tower, which is one of the few large floorplate office towers in the Parramatta CBD.</p> |
|  | <p>The impact of the proposal on the view catchment of nearby precincts and landmarks has not been considered. Of particular note are the historic core of Parramatta Park, St Johns Church and Centennial Square to the north.</p>  | <p>The VIA and HIS give further consideration to impacts of the proposal on the view catchment of the nearby precincts and landmarks and demonstrate an acceptable visual impact having regard to the emerging high-rise skyline of the Parramatta CBD.</p>   |
|  | <p>Sustainability and ESD considerations require more supporting evidence. The impact of the larger floor plate is that an unacceptable proportion of each</p>   | <p>Detailed consideration of sustainability and ESD considerations are more appropriately considered as part of the preparation of the design of the future</p>   |

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|  | <p>floor plate will be more than 12m from an external window. Access to natural light should be reviewed and adequate access demonstrated. The proposal to achieve a 5-star Greenstar rating is unambitious for a premium commercial office building. A 6-star rating would be more appropriate.</p>  | <p>tower. A Greenstar target of 5 green stars is appropriate in the circumstances and complies with the Parramatta DCP with respect to required Greenstar rating. It is further noted that the nearby Walker tower, which is aimed at a similar market segment has been approved with a 5 Greenstar rating and is consistent with market demand for A Grade office space in the Parramatta CBD.</p> <p>It is not possible to achieve large floor plates with all office space located within 12m of a natural light source. The urban design analysis indicates that some 85% of office space can be located within 12m of a natural light source. The limited area of floor space more than 12m from a natural light source can be utilized for activities that are not as dependent on natural light, such as reception areas, meeting rooms and back of office activities.</p> |
|  | <p>The introduction of active uses on the Argyle Street frontage is strongly supported. While outdoor dining is a good use along this north facing frontage it may conflict with pedestrian movements in Argyle Street and the provision of a sheltered bus stop waiting area for 4 different bus routes providing over 200 daily bus services.</p>   | <p>Outdoor dining is no longer proposed in the promenade area and all obstructions in this area have been removed to provide for the free flow of pedestrians. The promenade will continue to provide weather protection for bus passengers during inclement weather.</p>   |
|  | <p>The proposed commercial lobby at the roof of the shopping centre is not supported. Dramatic and generously proportioned lobbies are important to the life of the street and more consideration should be given to re-programming a greater proportion of ground level retail to create a suitably grand entry for this proposal. There is further opportunity to open up the blank upper levels of the Argyle Street frontage.</p> | <p>The concept plans have been revised to provide for a generously sized office tower lobby at ground floor level at the corner of Argyle Street and Marsden Street. Access to the office tower at podium rooftop level is designed to integrate the base of the tower with the approved level 6 retail additions.</p> <p>The concept plans provide for an active street frontage at ground level, integrated with new relating opportunities at ground level. The concept plans also include opportunities for enhancement of the facade of the retail podium when retail floor space within the podium is reconfigured.</p>   |

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|   | A targeted Design Excellence strategy is required to mitigate significant visual and urban impact of the proposed volume, including a review of the entire podium and the public domain. A combination of Competitive Design selection processes and formal Design Review is recommended.  | Development of the design of the office tower will be undertaken in accordance with Parramatta City Council's design excellence process, which includes a competitive design selection process and opportunities for Design Review.   |
|   | Review of tower location away from the Church St. corridor and any upper level setbacks controls that apply to Church St.  | The tower envelope is moved further away from Church Street.  |
|   | A more considered urban design assessment of the proposed height and volume in the context of the Parramatta CBD including impact of the proposal on the view catchment of significant precincts and landmarks, benchmarking against height, volume and articulation of similar developments in the CBD and pedestrian analysis including projected volumes and movement patterns. | As noted above, the Urban Design Analysis considers the results of the VIA and includes further consideration of and justification for the proposed building height and volume in the context of the Parramatta CBD and view catchments of significant precincts and landmarks. |
|   | Adjust the proposed envelope to enable greater articulation of the built form. The proposed volumes should be considered a maximum envelope, with GFA that occupies no more than 70% of the envelope (i.e. max 80,000m2 GFA).  | As noted above, GFA has been reduced to 105,000m2 and will not occupy more than 70-% of the volume of the envelope.   |
|   | Floor plate should be configured so that work stations are no more than 12m from an external windows and the Greenstar target should be increased to 6-star rating.  | As noted above, the Urban Design Analysis demonstrates a satisfactory level of access to natural light. The proposed 5 Greenstar rating complies with the requirements of Parramatta Council.   |
|   | Review location of the tower lobby, demonstrating how it will be integrated with ground level uses and activate the street and undertake a detailed review of the entire Argyle Street frontage, considering outdoor dining strategies, mapping projected pedestrian volumes and addressing bus operation and pedestrian amenity.  | As noted above, a substantial ground floor lobby is provided at the corner of Marsden and Argyle Streets.   |
| Roads & Maritime Services (11 September 2018) | Roads and Maritime Services (RMS) reiterates the requirements of Condition B6 of the Stage 1 Project approval for the retail additions, which require road improvement works to 2  | A substantial portion of the required road improvement works have already been completed. The balance of road improvement works are to be completed prior to the construction of  |

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|   | intersections on the Great Western Highway near the site and improvements to the intersection of Church Street and Campbell Street.  | <p>the approved retail additions on Level 6, in accordance with Condition B6 of the Project Approval for the retail additions.</p> <p>Car parking for the office tower is limited to 100 car spaces to minimize reliance on private vehicles, significantly less than the allowable amount of car parking that can be provided for the office tower. Accordingly, traffic generation from the office tower will be relatively minor.</p>   |
|   | RMS also requests implementation of a work- place travel plan for the proposed development to encourage public transport use and reduce reliance on private vehicles and requires that all works/regulatory signposting with the proposed development are to be at no cost to RMS.   | A work-place travel plan will be provided with the DA for the office tower and all associated works/regulatory signage provided at no cost to RMS.   |
| City of Parramatta Council<br>(10 October 2018) | <p>The Council objects to the proposed re-location of the commercial tower and maintains the previous position that it must not terminate the view corridor of Church Street. Council advises that the currently proposed location would conflict with City Centre Historic Views 3 and 5 in the Parramatta DCP 2011 and also presents a negative relationship with St John's Cathedral and is a dominant visual element that exacerbates the perceived density of cumulative development in the city centre. Council considers that the submitted view impact study has not addressed Council's previous concerns and the proposed tower will have a significant impact on the aforementioned view corridor.</p> <p>Council's Urban Design Team recommends that the tower be shifted a minimum of 40 metres to the west (clear of the building separation zone) with the most optimal location being the corner of Argyle and Marsden Street.</p> | <p>The revised modification relocates the tower envelope 42m further to the west and clear of the 40m wide heritage view corridor that extends from the north, south along Church Street to St John's. The revised envelope location is now in Council's preferred location at the corner of Argyle Street and Marsden Street and will not dominate the historic view corridor, having regard to existing and likely future high-rise towers to be developed near St John's Church.</p> <p>The VIA has been updated and revised to address the St John's heritage view corridor from the north down Church Street to St John's Church.</p> |
|   | Council does not support a 3m tower setback to Argyle Street and requires that tower setback to Argyle Street be increased to 6m to ensure an  | Tower setback has been increased to a complying 6m to Argyle Street and a complying 6m tower setback provided to Marsden Street.   |



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|  | appropriate visual scale at pedestrian level and mitigate wind downdraft effects.   |  |
|  | Council is concerned that the proposal will create shadow impacts on the Ollie Webb Reserve at 12pm in mid-winter. This reserve is located within a heritage conservation area and should have solar access protected between the hours 10am to 2pm (DCP Control 4.3.3.1).  | The revised tower envelope does not result in any shadows to Ollie Webb Reserve between the hours 10am to 2pm in mid-winter.   |
|  | With respect to traffic and access improvements, Council requests that the TMAP be revised to address identified intersection improvements, coordinate access with the Parramatta Bike Plan, quantify the impacts of footpath obstructions on pedestrian movement, demonstrate safe access to end of trip facilities and provide the measures implemented as part of a Travel demand management approach.                         | <p>A revised TMAP is included with the revised tower envelope modification. Limiting the extent of additional parking encourages use of public transport.</p> <p>The amendment of the proposal to retain and undercover promenade at ground level in Argyle Street, free of any obstructions ensures that the free flow of pedestrian flows along Argyle Street is not obstructed and confirms there is adequate capacity to accommodate increased pedestrian flows in Argyle Street between Church Street and Marsden Street.</p> <p>The revised modification envisages that the office tower car parking and bicycle parking and end of trip facilities will be accommodated in a future 2 level basement to be constructed below the existing retail podium at the southeast corner of Argyle Street and Marsden Street with direct lift access to the office tower above. Separate access will be provided off Marsden Street for cyclists to access the bicycle parking and end of trip facilities. These facilities are conveniently located with respect to adjacent cycling routes within the CBD.</p> |
|  | With regard to traffic modelling, Council requests that the TMAP be revised to include up-to-date traffic data, key intersection modelling, servicing requirements in relation to additional GFA, public transport, pedestrian and bicycle volumes. Council also requests that clarification be provided on the "previous work undertaken" which resulted in the conclusion that the level of public transport patronage could be | New traffic modelling is not necessary as the office tower is to be provided with only 100 car spaces .Such an increase in parking would generate only a low volume of additional traffic that would have a marginal if any measurable impact on the carrying capacity and congestion levels in the existing road network. Traffic generation primarily results from the approved but yet to be constructed retail additions. The RMS has identified   |

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|                                | <p>accommodated by the existing spare capacity on each train line and bus service.</p>   | <p>road improvements necessary for the proposed additional car parking and these road improvements will be completed prior to the retail additions. No further road improvements are required for the office tower component.</p> <p>Significant improvements to public transport are proposed for the Parramatta CBD, including a new light rail service and the planned Metro West rail line connecting the Sydney and Parramatta Central Business Districts. Additional information on public transport patronage and spare capacity is included in the revised Traffic and Transport Report.</p> |
| Submissions from the Community | <p>A total of 5 submissions were received from individuals in the community, with issues raised consolidated and summarized, as set out below.</p>   |  |
|                                | <p>The doubling of height of the proposed building is not consistent with the character of the existing proposal. However, I do support this modification in the location proposed as it reduces the visual impact on my building at 140 Church Street as well as maintain access to sunlight for the street level shops on Church Street.</p> | <p>The legislative framework allows a modification of a major project that enables significant changes compared to the proposal as originally improved.</p>  |
|                                | <p>Increasing building height from 120m to 188m above ground will cast an enormous larger, longer shadow on neighbouring buildings. Some buildings will lose their morning sun sunrise completely and be cast in shadow for the majority of the day.</p>   | <p>The proposal results in reduced shadow impacts to properties along Church Street. Residential properties will not experience increased shadow impacts to an extent that reduces their solar access to less than 2 hours during 9am to 3pm in mid-winter.</p>  |
|                                | <p>The proposed increased height will form a fence effect, affecting residents nearby, especially for those right at the back of Westfield.</p>  | <p>The revised modification places building form further from residential properties to the south. The future office tower will form part of the emerging high-rise building skyline of the Parramatta CBD, as viewed from the south.</p>  |
|                                | <p>Object to the significant reduction in car parking which will result in more cars parking illegally around nearby buildings. Westfield should increase car spaces for customers and tenants to cater for increased traffic</p>  | <p>The Applicant has been directed to minimise the extent of additional car parking in order to reduce reliance on private cars and optimize use of public transport. The site is well serviced with public transport and is a short walk</p>  |

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|  | <p>generation. Car spaces are difficult to find in the locality and there is currently insufficient parking in the area and often long queues to get in and out of the existing car parks. An increase in floor space of this scale should allow additional car spaces, particularly as it is already difficult to park there, especially during peak hours for parking.</p> | <p>from the Parramatta Railway Station and Transport Interchange. Council's parking requirements are expressed as a maximum, rather than a minimum. The number of additional car spaces complies with Council's parking requirements. The provision of 100 car spaces for an office tower of 105,000m<sup>2</sup> located in a major CBD is both adequate and appropriate.</p> |
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**Ingham Planning Pty Ltd**

**September 2020**