



Our Ref: 17124

8th April 2021

Key Sites Assessment
Department of Planning Industry & Environment
GPO Box 39
SYDNEY NSW 2001

Attention David Glasgow

Dear Mr Glasgow,

**RE: MODIFICATION OF CONCEPT PLAN (MP10_0068 MOD 1) OFFICE TOWER ENVELOPE
WESTFIELD SHOPPING CENTRE PARRAMATTA – RESPONSE TO EXHIBITION SUBMISSIONS**

I refer to your correspondence dated 17 December 2020 advising of completion of the exhibition of the Section 75W Modification Application relating to modifying the office tower envelope of Major Project MP10_0068 Concept Approval to provide for a larger building envelope, relocated further west above the existing retail podium on the southeast corner of Argyle Street and Marsden Street, Parramatta. The Department of Planning Industry & Environment (DPI&E) has invited the proponent to respond to issues raised in submissions to the exhibition of the Modification Application.

We note that at the completion of exhibition on the 15 December 2020, DPI&E allowed additional time for Parramatta City Council, the NSW Government Architect, and Heritage NSW to lodge their submissions with the Department. These submissions were received by DPI&E in late February. DPI&E has received submissions from the following:

- Transport for NSW - dated 15 December 2020.
- NSW Environment Protection Authority - dated 3 December 2020.
- NSW Planning Industry & Environment – Energy & Science Group - dated 11 December 2020.
- Heritage NSW (Dept of Premier & Cabinet) - dated 2 February 2021.
- Parramatta City Council – dated 25 February 2021.
- NSW Government Architect – dated 22nd February 2021.
- Public Submissions (2 in total) – dated December 2020.

Urban and Regional Planning, Environmental Planning and Statutory Planning
PO Box 251 Artarmon NSW 1570
Telephone: (02) 9416 9111 Email: admin@inghamplanning.com.au
A.C.N 106 713 768
www.inghamplanning.com.au



A Response to Submissions Table is attached at **Appendix A** and provides summary of the submissions, including issues raised and a summary of the Proponent's response to the issues identified in each submission. The key issues raised are identified and addressed, as follows.

1. Tower Building Envelope Location

The original tower building envelope location for Modification 1, as exhibited in September/October 2018, was proposed above the existing Myers Department Store, directly behind St. Johns Cathedral, terminating the vista south down Church Street. This location was prepared on the assumption that the heritage view corridor south, down Church Street, terminated at St. Johns Cathedral.

Parramatta City Council and the Heritage Office of NSW raised concerns with the location of tower envelope above the Myers Department Store and advised that the heritage view corridor did not terminate at the Cathedral, rather extended south beyond the view to the Cathedral. Council requested that the tower envelope be relocated at least 40m further to the west to be clear of the nominated 40m wide heritage view corridor and the further, not encroach into the 12m tower building setback proposed to apply to Church Street, north of Macquarie Street. In response to these requests, the Proponent in the revised re-exhibited Modification Application, has relocated the tower building envelope some 42m further to the west.

Council's submission to the December 2020 exhibition of the revised tower envelope location now proposed above the retail podium on the southeast corner of Argyle and Marsden Street, included a plan (Figure 2 – Church Street View Corridor) illustrating the nominated heritage view corridor. This view corridor on its western side also indicates the 12m tower building setback to Church Street property boundary (i.e. it corresponds with the 12m tower setback line), proposed in Council's Draft CBD Planning Proposal (Draft CBD PP). A copy of Council's view corridor plan is shown below in **Figure 1**.

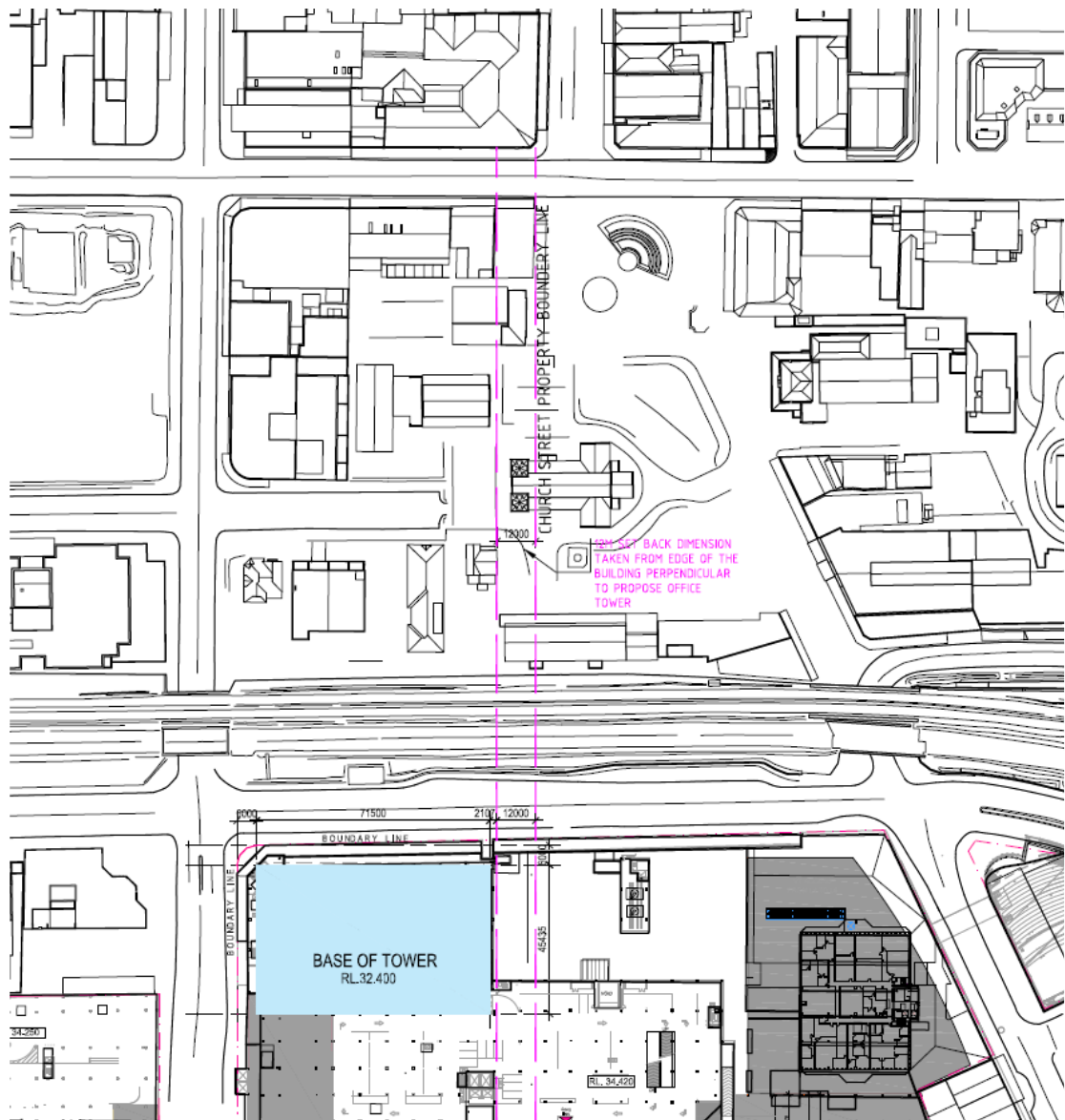
Figure 1 Church Street Heritage View Corridor





In accordance with the 12m tower setback line proposed in the Draft CBD PP, the Proponent has prepared a tower building envelope location plan accurately showing the location of the tower building envelope footprint and the 12m Church Street tower building setback line measured to the property front boundary, extended south from Macquarie Street. This plan is shown at **Figure 2** below (and a larger A3 version is attached at **Appendix 2**), and confirms the tower building envelope, as now proposed, is located outside the nominated view corridor, and provides a 14.1m tower envelope building setback, some 2.1m more than the minimum 12m required in Council's Draft CBD PP, and generally aligned with the eastern boundary line to the Draft CBD PP Height of Buildings Map – RL 211 maximum building height area.

Figure 2 – Plan of Church Street 12m Tower Building Front Setback Line





3. Tower Building Envelope Bulk, Scale and Floorplate Areas

Submissions from Parramatta Council, the NSW Government Architect and Heritage NSW raised concerns with respect to the bulk and scale of the proposed building envelope, floorplate size and potential visual impact, including views from old Government House and Domain (OGHD).

The proposed tower building envelope has maximum dimensions of 45.435m x 71.5m² (3,249m²) extending to a maximum height of RL 220 (approximately 188m) above the existing retail podium. However, the tower building envelope is substantially larger than bulk and scale of any future office tower, to provide for a generous minimum 30% building articulation zone within the building envelope. Accordingly, actual building bulk and scale should not be assessed against the building envelope, rather the assessment should be based on the on the tower form that is limited to 70% of the allowable building envelope.

Permissible gross floor area (GFA) is limited to a maximum of 105,000m², at least 70% less than the maximum potential GFA of 152,725m² that could be achieved within the proposed building envelope. The Proponent has also agreed to a maximum floorplate size of 2,550m² GFA, in the order of 700m² (21.5%) less than the lateral extent of the building envelope.

There are a range of design options for mitigating bulk and scale in the final design of the tower. The reference design accompanying the Modification Application explored one option, which provided for reduced floor plate sizes in the middle and upper sections of the tower. The reference design is one option only and does not constrain alternative design strategies to ensure a generous level of building articulation and high-quality design outcomes. These tower design options would be explored during the design excellence process, the associated design brief, and the subsequent architectural design competition.

The Proponent has undertaken extensive market investigations relating to the floorplate requirements for major corporate and government tenants in CBD locations. These investigations indicate that a minimum floor plate size of 2,000m² GFA is standard, with opportunities to provide floorplates in the order of 2,500m² GFA essential.

The Westfield Parramatta site provides a rare opportunity to accommodate larger tower floorplates proportionate to the existing substantial retail podium mass. Apart from Parramatta Square where large development parcels have been aggregated, fragmented land ownership in most areas of the Parramatta CBD make it extremely difficult to create development parcels of sufficient site area to accommodate large floorplate office towers. Most of the taller towers in the CBD have been residential above podium, a form of development that does not require larger tower floor plate sizes.

Previous constraints on office tower floor plate size in the Parramatta CBD have discouraged construction of new contemporary office towers in the Parramatta CBD. As part of its planning investigations for the Draft CBD PP Council commissioned a review of trends in office development. The results of this review were consistent with the Proponent's market investigations and indicated that floorplates of more than 2000m² GFA were essential for major corporate and government tenants in CBD locations.



Parramatta Council has now abandoned its previous floorplate size controls for office towers, a decision which appropriately allows larger scale office buildings in the Parramatta CBD, as exemplified by the Walker Tower nearing completion in Parramatta Square. While there are few examples of large floorplate office towers in the Parramatta CBD, due to the previous conservative controls over maximum office floor plate size, there are numerous examples of large floor plate office towers in other major CBD's.

The Proponent's Urban Design Report prepared by Woods Bagot included a number of examples of large floor plate towers comparable in size to the floorplates envisaged in the office tower proposal for the Westfield Parramatta site. Woods Bagot has prepared an Addendum to their Urban Design Report (copy attached at **Appendix 4**) providing additional examples of large floor plate office towers. Of particular relevance is the example of 1 William Street, Brisbane. This contemporary high-rise large floorplate office tower exhibits the following features essential to attracting major tenants.

The tenant profile for Parramatta is predominantly focussed on Government and larger institutional tenants. Based on this knowledge Woods Bagot have worked with Scentre Group to shape a planning envelope and architectural and urban design outcome that will be highly capable of addressing the needs of this tenant type, while contributing to the future of workplaces in the CBD.

1 William Street, Brisbane, designed by Woods Bagot is a perfectly applicable precedent for meeting the needs of Government and larger institutional tenants. Developed by CBUS Property, it was specifically designed for the Queensland Government to meet the needs of their employees, while responding to context and elevating the workplace quality of government employees.

The office tower for 1 William Street occupies a highly prominent location in Brisbane, comprising a 43 level A-grade commercial building with Premium services, providing approximately 75,000m² (NLA), including 1,100m² of retail floor space and 318 car spaces.

The collaborative central core allows extraordinary daylight and views in 360 degrees, with floor plates ranging from approximately 1,900m² to 2,100m² (NLA).

1 William Street includes a high level of environmental performance, recently achieving a 6 Star Green Star Office As Built V3 certified rating and targeting a minimum 5 Star Green Star Office Design V3 rating and 5 Star NABERS energy rating.

The Addendum prepared by Woods Bagot with respect to proposed bulk, scale and floorplate size indicates that proposed bulk and scale and floor plate size is appropriate for a contemporary office tower located in a large CBD, designed to meet the needs of major corporate and government clients. In reaching this conclusion, Woods Bagot note the following key points:



- 100,00+m2 offering potential to accommodate a number of departments and ancillary business in a collaborative environment.
- Large floorplates (at least 2,000m2 GFA) that promote flexible workplace arrangements and fitout possibilities.
- Highly amenitised offering that addresses the need to encourage future workplace modes in balance with WFH practices.
- Benefits of co-location with major retail and support services.
- Optimised access to and use of public transport for the future workforce.

4. Impact on Heritage View Corridors – St John s Cathedral & Old Government House

It has been demonstrated that the relocation of the proposed office tower envelope some 42m further to the west has ensured that the future building will not encroach into the heritage view corridor of St. Johns Cathedral. This has been acknowledged by Heritage NSW and Parramatta City Council.

It is acknowledged that the upper portion of the future office tower will be visible in the angled view south from Old Government House (OGH). OGH is located approximately 1km northwest from the location of the proposed office tower and enjoys a wide angle of view, predominantly east towards the Parramatta CBD.

The Proponent's Heritage Impact Statement (HIS) notes that in the recommendations from the World Heritage Committee it is stated that parties to the agreement *"pay attention to managing the landscape values of the site in or close to urban areas by studying visual impact of their current environment and any projects likely to affect those values."* The HIS further observes that the Agreement does not have any specific directions or provisions in relation to the management or assessment of these views.

The Proponent's HIS evaluated visual impact on Old Government House (OGH) in detail utilising the Plansphere 2012 Technical Report - *Development in Parramatta City and the Impact on Old Government House and Domain's World and National Heritage Listed Values*. This Report identifies 16 view cones of which 4 are applicable to the subject land, being View 1 (OGH towards the City), View 5 (Bathhouse area to the City), View 8b (Parramatta River Views) and View 16 (Mays Hill).

The impact on Views 8b and 16 are minimal. Moving the tower building envelope further west as now proposed, results in the envelope being located outside View 8b – Parramatta River Views. View 16 (Mays Hill) is identified as being of only moderate significance and the proposal is located on the southeast edge of this View and would have less impact than the Walker Tower, which is more centrally located within View 16.

The primary view impact with respect to OGH relates to Views 1 and 2, which are substantially similar. The View 1 OGH view cone towards the CBD, including the previous tower location to the east, is shown in **Figure 4** on Page 8.

Figure 4 – View 1 – Old Government House Towards the City



With respect to View 1, two visual impact sensitivity areas are identified within the view cone – highly sensitive and sensitive. The proposal is not located within the highly sensitive area and is located close to the southern edge of the subject view cone. The view impact Guideline for future development advises that intensive development should be contained within the central city precinct to ensure that the city buildings do not visually dominate the skyline over a broad area and not be located near Phillip Street. The site is located within the City Central Precinct and is not located near Phillip Street.

The Guidelines include several recommendations regarding the design of towers to mitigate visual impact, such as being well proportioned, with a visually interesting top, elevations that enhance the skyline, introducing upper-level setbacks to allow for view sharing from and between buildings, and orientation of buildings towards the street grid. The proposal is for a tower envelope only. The envelope is suitable aligned with the street grid and facilitates design of a future office tower consistent with the nominated design guidelines.

Since the 2012 Technical Plansphere Technical Report, numerous high-rise tower buildings have been developed in the view cone from OGH identified in **Figure 4** on Page 7. Most of these new tower buildings are located more centrally within the view cone, particularly the cluster of large, tall towers in Parramatta Square, including the Walker Tower. The proposed tower envelope is near the southern edge of the view cone and a future office tower will be subsumed into the emerging high rise CBD skyline of the Parramatta CBD. The proposal has a satisfactory visual impact on Old Government House and the Domain and is consistent with the visual impact of many of the existing and yet to be constructed approved high-rise tower buildings in the Parramatta CBD.



5. Retail podium facades

The proponent is seeking approval for an office tower envelope only, to be located above the retail podium. The future office tower will be suitably integrated into the retail podium and the development of the tower will include upgrading of the existing retail podium facades below the office tower, including active frontages at street level. It would not be appropriate to provide a design for an upgraded retail podium façade, in the absence of a tower design.

Upgrading the retail podium facades will be included in the design brief for the future tower and included in the design competition for the tower. This will ensure that the design of the tower within the tower building envelope and the upgraded podium facades below, are architecturally compatible and present a coordinated, integrated and attractive podium and tower design.

6. Shadow & View Impacts to Campbell Street Residential Properties

The proposed office tower envelope will cast some mid-winter shadows over residential properties on the southern side of Campbell Street, beyond the shadows cast by the existing retail and parking podium. The shadow diagrams indicate that shadow cast over each affected dwelling/apartment are for a relatively brief periods, generally not exceeding 1 hour over any individual dwelling.

The dwellings on the southern side of Campbell Street are north facing and will continue to receive a generous level of solar access, exceeding the minimum mid-winter 2 hours solar access between the hours 9am to 3pm required for residential development in high-density metropolitan locations.

Figure 5 below, is a representation of the view impact of the proposal on existing views from the residential building on the southern side of Campbell Street, located directly to the south of the proposed office tower.

Figure 5 – View Impact Diagram Campbell Street Looking North





Campbell Street residential properties located above the height of the Westfield Shopping Centre retail podium currently enjoy northerly views towards the Parramatta CBD skyline. These skyline views are for the most part located to the east of the proposed tower building envelope

As illustrated in **Figure 5** on Page 9, relatively wide view corridors will continue to be available to the east and west of the tower envelope. View impacts also need to be considered in context. Preservation of views in the context of an emerging CBD high-rise skyline is far more problematic, compared to preserving views in low and medium-rise residential areas. View impacts are modest and reasonable view sharing is achieved, having regard to the high-rise CBD context of the site and the increased building heights for the locality envisaged in the exhibited Draft CBD PP.

7. Design excellence process for the future office tower

The Proponent has prepared a Design Excellence Strategy for the future office tower, which will provide direction to the design excellence process and the design excellence competition. A copy of this Design Excellence Strategy is attached at **Appendix 5**.

The Design Excellence Strategy provides for a design brief generally in accordance with Parramatta Council's Design Excellence Brief Template. The design excellence process will be overseen by a Design Review Panel comprising representatives of the Proponent and Parramatta City Council and will include at least 2 registered architects with extensive experience in office tower design.

The proponent's reference design will not form part of the design brief and will not constrain potential design solutions. Completion of the design competition and selection of the winning design by the Design Review Panel is to be completed before preparation of a Development Application for the future tower and the design of the tower is required to be consistent with the design selected by the Design Review Panel.

Please contact the undersigned should you require any further information in relation to our response to submissions to the exhibition of Westfield Parramatta Major Project MOD 1 – Revised Tower Building Envelope. We look forward to your support of the Modification Application and issue of a Modified Concept Plan Approval.

Yours Sincerely

Nick Juradowitch
Director
Ingham Planning Pty Ltd



Appendices

- 1. Response to Submissions Table prepared by Ingham Planning Pty Ltd**
- 2. Plan of Church Street 12m Tower Building Front Setback Line**
- 3. View Impact Diagram – Campbell Street Looking North**
- 4. Urban Design Addendum Report March 2021 prepared by Woods Bagot**
- 5. Design Excellence Strategy March 2021 prepared by Ethos Urban**
- 6. Revised Statement of Commitments prepared by Ingham Planning Pty Ltd**