

RESPONSE TO SUBMISSIONS TABLE - MODIFICATION EXHIBITION

SUBMISSION FROM/DATE	ISSUES RAISED IN THE SUBMISSION	RESPONSE TO SUBMISSION
Transport for NSW 15 December 2020	<p>Transport for NSW (TfNSW) provided advisory comments and recommendations suggested additional conditions identified by Roads and Maritime Services be included. The following issues were raised:</p> <p><i>Loading & Servicing Management;</i></p> <p>TfNSW noted that information was not provided in relation to size of loading spaces and clearance height of the proposed dock and details of the interface between the proposed dock and the existing Marsden Street loading dock(s).</p> <p>TfNSW also noted that there appears to be no documented surveys to substantiate estimated number of service movements associated with the office tower and that without adequate service vehicle facilities there is potential to create disruption by freight and servicing vehicles circulating through the Parramatta CBD to find a loading zone.</p> <p>TfNSW requests that the applicant be conditioned to prepare a draft Loading and Servicing Management Plan as part of any Stage 2 application, which is to include matters such as an independent survey of service vehicle movements of similar types of developments, details of the development's freight and servicing profile, details of loading and servicing facilities within the site to meet demand and details of how loading and servicing vehicle movements would be accommodated within the site through the provision of additional</p>	<p>TfNSW's submission seeks inclusion of consent conditions relating to matters that would more appropriately be included as consent conditions in the future DA for the office tower.</p> <p>The proponent is agreeable to the Statement of Commitments being amended to include undertakings to address loading and servicing management, construction pedestrian and traffic management and a green travel plan, as part of the preparation of the development application for the proposed office tower.</p>

	<p>loading spaces and then improved management of existing spaces or a combination of both.</p> <p><i>Construction Pedestrian & Traffic Management;</i></p> <p>TfNSW noted that the proponent indicated a Construction Pedestrian & Traffic Management Plan (CPTMP) as part of the preparation of a DA for the tower and requests the applicant be conditioned to prepare a CPTMP as part of the Stage 2 DA.</p> <p>TfNSW listed a number of matters which need to be addressed in the CPTMP such as location of work zones, crane and construction vehicle arrangements, haulage routes, construction hours, predicted number of construction vehicle movements and types, construction program and methodology, potential traffic impacts (traffic, cyclists, pedestrians, light rail and bus services), cumulative construction impacts and proposed mitigation measures.</p> <p><i>Green Travel Plan;</i></p> <p>TfNSW noted that the TMAP proposes some measures to encourage sustainable transport and travel by non-car modes and requests the applicant be conditioned to prepare a draft Green Travel Plan as part of the Stage 2 DA.</p>	
<p>NSW Environment Protection Authority</p> <p>3 December 2020</p>	<p>The NSW Environment Protection Authority (EPA) notes that based on the information provided, the proposal does not appear to require an environment protection license, is not being undertaken by or on behalf of a NSW Public Authority, nor are the proposed activities or other activities for which the EPA is the appropriate regulatory authority.</p>	<p>The Proponent notes that an environment protection license is not required and that no follow-up consultation with the EPA is required. No further response is necessary. Any future DA for the office tower can be referred to the EPA for comment, if considered necessary.</p>

	<p>The EPA advises that in view of the above factors, the EPA has no comments to provide on this project and no follow-up consultation is required.</p>	
<p>NSW Planning Industry & Environment – Environment, Energy and Science Group</p> <p>11 December 2020</p>	<p>The Environment, Energy and Science Group (EES) of NSW Planning Industry & Environment advise that EES has reviewed the Modification Report and relevant documents and make no comments.</p>	<p>No response is required.</p>
<p>Heritage NSW (Department of Premier & Cabinet)</p> <p>2 February 2021</p>	<p>Heritage NSW note that the former Heritage Council's concerns in relation to the location of the tower have been addressed in that the tower has been relocated so that the tower does not terminate the axial view south along Church Street and allows continuity of the vista behind the St Johns Church to the south.</p> <p>Heritage NSW identify that a visual comparison of the east-west (the proposed option) and the north-south tower envelope (the alternative option) has not been provided and that it is not clear from the table presented on page 25 of the Urban design Report as to why the north-south tower envelope option is not a better option when considering the impact on views to the St John's Cathedral and beyond from Church Street.</p> <p>Heritage NSW acknowledges that the views to the Parramatta CBD from the Old Government House and Domain (OGHD) have been affected by a number of new high-rise towers, Heritage NSW notes that Heritage NSW in its letter dated 15 June 2020 requested that the height and FSR controls should remain consistent with the existing controls in Council's LEP for significant SHR items, such as St John's Anglican Cathedral.</p>	<p>The Proponent agrees that the new location for the office tower envelope does not terminate the axial view south along Church Street and allows continuity of the vista behind the St Johns Church to the south. It should also be noted that the new office tower location is located outside the nominated 40m wide view corridor.</p> <p>Given the circumstances outlined above, it is considered that a visual comparison of the east-west and north-south options is unnecessary. While it is acknowledged that the north-south option has increased setback to the subject view corridor, the proposed east-west option is clearly outside the nominated view corridor and offers substantially superior functional and urban design outcomes, compared to the north-south options. It should also be noted that any future tower can provide additional setback to the view corridor for the upper portion of the tower.</p> <p>The office tower envelope provides capacity for building articulation so that the constructed tower occupies</p>

	<p>Heritage NSW advises that based on the previous concerns raised by the Heritage Council in 2018 relating to substantial increase in the tower's height and bulk, which the Heritage Council considers dominates the skyline in the vicinity of several State heritage items and impact on the significant views from OGHD), concerns are still raised in relation to height and bulk remain.</p>	<p>substantially reduced bulk, compared to the envelope.</p> <p>With respect to building height it is contended that the Parramatta Skyline has and will continue to change, with an increasing number of high-rise towers located within the views from OGHD.</p> <p>Several Planning Proposals have been supported for new high-rise towers in the Parramatta CBD, including locations near the development site. Nearby examples include 2 O'Connell Street and 11-13 Aird Street.</p> <p>It is not appropriate to apply the height controls of the existing PLEP to the proposed tower envelope. New LEP controls have been exhibited and will be introduced in the near future for the Parramatta CBD that provide for substantial increases in building height, including heights similar to the proposed tower envelope. These new planning controls are directly relevant to the proposed office tower envelope and as they have been exhibited, are required to be given significant weight. The proposed tower envelope is located within an area designated in the exhibited Draft LEP for buildings extending up to a height of RL 211, increasing to RL243 utilising the design excellence height bonus. The RL 220 proposed in the modification is 23m less than the maximum height potential for the site.</p>
	<p>Heritage NSW further advises that if the proposed modification is approved, it is recommended that the previously recommend conditions regarding tower</p>	<p>The Heritage NSW submission seeks inclusion of consent conditions relating to design details that would more appropriately be included as</p>

	materials, finishes and design resolution and tower signage are included as conditions of consent.	consent conditions in the future DA for the office tower, or alternatively as matters to be considered in the design excellence process that is required as part of the preparation of the future DA for the office tower.
<p>Parramatta City Council</p> <p>25 February 2021</p>	<p>A 2m land reservation as Land Reservation Acquisition (LRA) is required along the Marsden Street frontage in the exhibited draft LEP controls in the CBD PP. The proposed street wall along this interface should make the necessary allowance for this LRA.</p> <p>The proposal should be consistent with the proposed Height of Building (HOB) as indicated in the Draft CBD PP (i.e. up to RL 211)</p>	<p>The proposed 2m wide land reservation is located along the eastern side of Marsden Street and designed to allow Marsden Street to be widened to accommodate a regional cycleway. The proponent notes this proposed reservation and Council's intentions for a cycleway. The proposed office tower envelope is located above the retail podium and setback at least 6m to Marsden Street and will not be impacted by the proposed 2m widening if it proceeds. Accordingly, this issue is not a matter that needs to be addressed in the requested modification of the Concept Approval, rather it can be addressed when the DA for the office tower is prepared, in the event the Draft CBD PP is implemented with the Marsden Street widening proposal included.</p> <p>The proposed tower envelope location generally aligns with the HOB Map of the Draft CBD PP permitting a building up to RL 211 (Figure 1 in Council's submission). The proposed tower envelope extends up to a maximum RL of 220, including architectural roof features. Where a DA is subject to a design excellence process, the Draft CBD PP allows a 15% height and FSR bonus. This would allow a building to extend to a height of up to RL 243 on the site. The future tower within the envelope</p>

	<p>Podium improvements, street level activation and public domain improvements discussed with Council will be secured through any future consent.</p> <p>The proposed tower is to be clear of the Church Street View Corridor, as formalized in the CBD PP and is setback 12m from the boundaries of Church Street, as shown in Figure 2 of Council's submission.</p> <p>Zero setbacks for the podium to Marsden and Argyle Street and tower setbacks of 6m to these streets.</p> <p>The proposed floorplate of the commercial tower (approximately 45m x 71.5m) is one of the largest for a commercial tower of the proposed height within the CBD. Whilst the unique site characteristics of the Westfield complex and the floorplates of Parramatta Square are acknowledged, the size of the potential floorplate is of concern in terms of perceived bulk as well as distant views from the North, South, as well as from Old Government</p>	<p>is subject to a design excellence process and will have a maximum height some 23m less than the maximum permitted.</p> <p>The proponent confirms that podium improvements, street level activation and public domain improvements will be included in the future DA for the office tower and the required plans of these works will be prepared in consultation with Council.</p> <p>The eastern elevation of the office tower building envelope does not encroach into the Church Street View Corridor, as identified in Figure 2 of Council's submission. The proponent has prepared a plan, enclosed separately accurately locating the subject view corridor confirming the proposed building envelope does not encroach into this view corridor. The envelope is also fully compliant with the Council's 12m Church Street setback line, achieving a 14.1m setback, some 2.1m greater than required.</p> <p>A zero podium setback is provided to Marsden and Argyle Streets and a 6m tower setback is provided to these streets.</p> <p>The dimensions of 45.435m x 71.5m² (3,249m²) are the dimensions of the tower building envelope, not the dimensions of the proposed tower floor plates. The proposed tower floorplate will occupy a substantially smaller footprint, particularly at the upper levels. The lower-level floor plate of 2,865m² provides for a GFA of 2,296m². The middle level floor plate of 2,659m² provides for a GFA of</p>
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	<p>House and Domain (OGHD). The tower length above street wall is also significant.</p> <p>The floorplate within the proposed envelope should be limited in size to allow for an acceptable built form in this location. This could then be explored further during the design excellence competition to improve perceived bulk and presentation of the tower.</p> <p>The proposed street wall along Argyle Street and Marsden Streets will be a key part of the overall design and the following objectives should be considered, with key controls included in any future design competition and agreed with Council. Objectives include design the space of the street and public spaces and articulate their edges; design the street wall to provide appropriate scale and detail and</p>	<p>2,390m² and the upper-level floor plate of between 2,226m² and 2,310m² provides for a GFA of between 2,032m² and 2,115m².</p> <p>Contemporary office towers designed for major tenants require floorplates with a GFA in the order of 2,000m² to 2,500m². The Urban Design Report includes numerous examples of contemporary A Grade office towers with large floor plates, similar or larger than the proposed tower floorplates. These examples include the nearby Walker Tower. Additional examples, such as 1 William Street, Brisbane have been included in the Urban Design Addendum Report responded to submissions to the exhibition of the Modification.</p> <p>The larger floor plates in the reference design are confined to the lower levels, consistent with good design practice and where it is possible to accommodate greater building bulk with much less visual impact. Further, the unique size of the Westfield site provides a rare opportunity to accommodate large tower floorplates proportionate to the existing substantial retail podium mass.</p> <p>The existing retail podium is retained, with improvements to the façade and activation at street level. Council's objectives for the podium facades below the tower will be included in the design excellence brief and integrated into the design of the future office tower building.</p>
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	<p>achieve fine grain modulation of the street; minimize large expanses of inactive frontage and use durable materials and detailing that are appropriate for their location and climate and complement the local context.</p> <p>Given the proposed entertainment and outdoor dining proposed on the roof adjacent to the Tower's upper-level lobby (above the podium roof), Council recommends the use of heat island reduction strategies such as light weight devices/pergolas, green vines on trellises, green roofs as well as use of cool roofing materials.</p> <p>The scope of public domain works should be modified to include the following items: <i>Pavement upgrade extended south on Marsden Street to the second vehicle crossing just north of the overhead bridge;</i> <i>Pedestrians should have priority at vehicle crossings. Vehicle crossing and pavement details should be as per Council's standard details DS40;</i> <i>Relay pavement from back of kerb to building edge and entry points (not property boundary) with no banding as per the PDG;</i> <i>Activation at street level relies equally on fully accessible fine grain retail accessed from the public domain. Placement of furniture intended to activate the street should consider the colonnade provides pedestrian cover (from the rain and the sun) and movement along Argyle Street as well as access to ground floor retail. This movement along the needs to be generous, not unnecessarily cluttered with furniture;</i> <i>While improving pedestrian crossing experience at an intersection is encouraged, the streets should read as a single space, not one with potentially unique and unrelated</i></p>	<p>Council's recommendations relating to heat island strategies will be considered as part of the design of future development proposals on the roof of the podium, adjacent to the proposed tower.</p> <p>Plans for public domain works will be prepared in consultation with Council as part of preparation of the DA for the office tower and will have regard to the recommendations that council has outlined in its submission and will include the necessary documentation in relation to public Domain Alignment Drawings and the Preliminary Public Domain Plan.</p>
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<p>Government Architect</p> <p>22nd February 2021</p>	<p>GA note that the proponent is undertaking a design excellence process “in accordance with Parramatta Council’s design excellence process” and advise this is not acceptable as the details of the process have not been provided. It is recommended that a Design Excellence Strategy be prepared for this project and that the strategy should include, but not limited to:</p> <p><i>A description of the proposed Design Competition process for this project (refer to Director General’s Design Excellence Guidelines and GANSW’s Draft Design Excellence Guidelines. The proposed reference design should not be a mandatory envelope for the purposes of the Design Competition – there should be considerable flexibility to vary the reference design.</i></p> <p><i>A description of the Design Integrity Panel process to ensure that the competition winning design is implemented in accordance with the recommendations of the Competition Jury.</i></p> <p><i>Provisions for achieving Design Excellence for the public domain (both streets) and the retail podium (if these aren’t already included in the scope of the Design Competition).</i></p> <p>GA notes the tower relocation and advises the exact alignment in relation to Church Street is not clear from the information provided.</p>	<p>The proposal is for an office tower envelope only. The proponent agrees that the design of the office tower would be subject to a design excellence competition prior to preparation and submission of a DA for the office tower. The proponent further agrees to preparation of a Design Brief for the office tower, generally in accordance with the principles of Parramatta Council’s Design Brief Template and the office tower project will also include the retail podium to both streets, directly below the tower.</p> <p>The reference design has been provided only to demonstrate how a suitable office tower could be developed within the building envelope and would not be used in any way to prescribe design outcomes for the future tower.</p> <p>The proponent has prepared a Design Excellence Strategy for the office tower, which will provide direction to the design excellence process and the design excellence competition. The Strategy provides for a design brief and a Design Review Panel, with endorsement of the final design by the Panel required before submission of a DA for the tower.</p> <p>The eastern elevation of the tower envelope is located outside the subject Church Street View Corridor and does not</p>

	<p>GA further advises that the tower envelope should sit <i>'away from the Church Street corridor and any upper level setback controls that apply to Church Street.'</i> GA notes that the Council has identified a 12m upper level setback requirement and this should be the minimum and further advises that due to the significant scale of the proposal and its impact on the Church Street view corridor, an even greater setback is warranted.</p> <p>The GA comments in relation to benchmarking against height, volume and articulation of similar developments in the CBD and argues that the 7 comparable towers tested in the Urban Design Report don't support a larger envelope in that most are less than 34 storeys, the buildings with larger floor plates are less than 20 storeys, the only taller building (55 storeys) has smaller overall dimensions, and a smaller floor plate. GA is concerned with the extend of GFA and notes that it is only reduced by 7,000m² (from 112,000m² to 105,000m²) and to achieve the requested 70% of GFA envelope utilization, floor to floor heights have been reduced (from 4.2m to 3.75m) to make room for 6 additional floors (from 41 to 47 storeys) within the envelope. While the proposed floor heights are permissible, this is sub-optimal for large floor plate building. A 70% GFA utilization for the original 41 storey design, would result in a much smaller GFA of around 87,000m².</p>	<p>encroach into the 12m setback to Church Street that applies to towers located north of Macquarie Street.</p> <p>A plan plotting the 12m setback line extended south to the proposed office tower envelope is provided confirming compliance, with a 14.1m setback provided, which exceeds the minimum required by 2.1m</p> <p>The reference design also provides for a greater setback for the middle and upper levels of the tower. This could be addressed in the Design Competition Brief.</p> <p>Very few major office towers have been developed in the Parramatta CBD primarily due to the past practice of limiting floor plate sizes. This is no longer the case and facilitated the recent construction of the Walker Office Tower, near Parramatta Railway Station.</p> <p>A large floor plate is essential for attracting major corporate and government tenants. The largest floorplates are appropriately located below the 18th storey of the tower. Similar contemporary large floor plate office towers in major CBD locations are typically in the order of at least 100,000m² GFA and need to offer a substantial GFA to attract major national and international tenants.</p> <p>A significant reduction in GFA would render the project unviable. The current Modification provides for a reduction in GFA from a maximum of 112,000m² proposed in the previous</p>
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		location above the Myers Department Store to a maximum of 105,000m2 in the location now proposed further to the west. Building height is some 23m less than the maximum height permitted for the site pursuant to the design excellence bonus provided in the exhibited Draft CBD PP.
Sydney Water	No response received	Endeavour Energy requirements can be considered and suitably addressed in the future DA for the office tower.
Sydney Trains	No response received	Endeavour Energy requirements can be considered and suitably addressed in the future DA for the office tower.
Endeavour Energy	No response received	Any Endeavour Energy requirements can be suitably addressed in the future DA for the office tower.
Public Feedback Submissions (2 submissions various dates)	<p>Submissions from the general public raised the following concerns and issues:</p> <p>50% increase in height is excessive.</p> <p>Increased height combined with moving the tower further west increases morning shadowing of properties to the west outside the CBD Zone.</p> <p>Developers obtain approval for a project and then come back for even more – such game playing of the system should be rejected.</p>	<p>Proposed building height is generally consistent with the emerging high-rise skyline of the Parramatta CBD and increasing number of high-rise towers constructed and proposed to be constructed in the CBD, including locations near the site. The shadow diagrams indicate that a complying level of solar access is maintained to properties to the west located outside the CBD Zone.</p> <p>New LEP controls are being introduced that provide for substantial increases in building height, including heights similar to the proposed tower envelope. These new planning controls have been exhibited and should therefore, be given significant weight.</p>

	<p>The proposed tower envelope is located within an area designated in the exhibited Draft LEP for buildings extending up to a height of RL 211, with a design excellence height bonus allowing height of up to RL 243, some 23m more than the RL 220 proposed in the modification.</p>
<p>We don't need any more apartments in Parramatta – there are already too many.</p> <p>The proposed high-rise apartments will totally block the view of the apartments in Campbell Street and devalue all these apartments a lot.</p>	<p>The proposal does not include any residential apartments.</p> <p>The subject views north from Campbell Street are towards the CBD skyline of the Parramatta CBD. The proposed office tower will be subsumed into this skyline view. Views towards the skyline to the east and west of the tower will continue to be available from apartments in Campbell Street. View impacts are modest and reasonable view sharing is achieved having regard to the high-rise CBD context of the site. A view impact drawing has been provided to confirm reasonable view sharing is achieved in the context of a high-rise major CBD.</p>