



Our Ref: 17124

30th 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 FURTHER SUBMISSIONS**

I refer to your recent advice that an opportunity has been provided for Parramatta City Council, the Heritage Council NSW, Transport for NSW and the NSW Government Architect to provide a further response to the Applicant's Response to the Exhibition Submissions. We have reviewed the further submissions received and provide the following response to those submissions.

Parramatta City Council (23 April 2021)

Parramatta City Council in its further submission dated 23 April 2021 advises that it is likely that the proposed Land Reservation Acquisition (LRA) along the eastern side of Marsden Road, within the Westfield Parramatta Shopping Centre site, will be removed from the Draft CBD Planning Proposal (PP). The Applicant supports removal of this LRA and confirms that a standard zero lot street wall with a 6m upper-level tower building setback to Marsden Street and Argyle Street will be delivered and building setbacks will comply with those recommended by Council in its further submission.

Council confirms that the proposed office tower building envelope appears to be broadly consistent with the Height of Buildings Map in the Draft CBD PP. Council also confirms that the proposed office tower building envelope appears to be broadly consistent with the Church Street View Corridor proposed in the Draft CBD PP and the associated 12m tower building setback to Church Street. Council requests that consistency be accurately demonstrated as part of the design of the future office tower.



The Applicant is agreeable to a consent condition that the eastern elevation of any future office tower constructed within the proposed building envelope be located so as not to encroach into the western edge of the nominated Church Street View Corridor or the 12m tower building setback applying to the western side of Church Street, at the intersection of Macquarie Street. Appropriate documentation to accurately demonstrate compliance will be included with the development application for the office tower.

Council remains concerned with the size of the proposed floor plate and length of the tower. Council incorrectly states the proposed floor plate will measure 45m x 71.5m (3,22m²). This is the dimension of the proposed office tower envelope in plan-view, and is larger than the floor plate that would be provided. In the reference design maximum floor plate size equates to maximum gross building area (GBA) and in plan-view, provides for a maximum area of 2,865m², with a maximum assessable GFA of 2,534m². The reference design provides for reduced GBA and GFA in the middle and upper portions of the tower.

Council requests that maximum floor plate area (i.e. GBA) be reduced to 2,500m², which would effectively reduce associated maximum GFA to around 2,170m². While the reference design is not binding on future tower design it appropriately locates the largest floor plates on the lower levels of the tower. It is also essential that the future office tower be capable of accommodating tower floor plates of at least 2,800m² to meet the needs of major corporate and government tenants.

The Applicant has provided extensive and detailed justification for large floor plates within the economic analysis, the urban design analysis and in the Response to Submissions dated 8 April 2021. The Westfield Parramatta site is one of the few locations in the Parramatta CBD that is capable of successfully accommodating an office tower with larger floor plates as proposed.

The proposed tower provides substantial separation distance to existing and future tower buildings. The Church Street View Corridor precludes construction of any future tower building to the east of the site, between the proposed tower and Church Street. This View Corridor also ensures a separation distance of more than 50m to any future tower to the southeast.

No tall tower buildings are permitted to the north of the site, south of St Johns Church. Any future tower to the west of the site would be located on the western side of Marsden Street, which in combination with a 6m tower setback, would result in a separation distance of at least 32m. The closest potential future tower building would be directly to the south, at the northeast corner of Marsden Street and Campbell Street. Structural constraints within the existing retail podium would require such a tower to be located at least 30m to the south of the proposed tower.



Council, in its further response notes the particular circumstances applying to the Westfield land holdings, and the planned locations for taller buildings, as envisaged in the Draft CBD PP. We agree that these particular circumstances should be noted, and larger floor plates, as proposed on the Westfield site, do not create a precedent for similar larger floor plate sizes on more constrained sites, typically much smaller than the Westfield site.

With respect to the Design Competition, the Council requests that street wall improvements along Marsden Street and Argyle Street be included in the Design Competition. The future office tower will be integrated into the retail podium below and will include upgrade of the podium facades to Marsden Street and Argyle Street, below the tower.

The street wall objectives and controls that Council has identified can be suitably considered and incorporated where appropriate, into the Design Competition Brief. The Applicant agrees to include a streetscape analysis and suitable street wall plans for the façade below the office tower as part of the development application for the future tower.

Matters relating to cool roofs/greening of roofs and public domain have been addressed in our original Response to Submissions earlier in April. The public domain improvements in Argyle Street and Marsden Street will include cohesive pavement upgrading and public art will form part of the final outcome to be agreed in consultation with Council.

As previously advised, the Applicant agrees to undertake a Design Competition in accordance with the City of Parramatta Design Competition Brief template. References to Design Review Panels have been changed to Design Excellence Jury in the updated draft Statement of Commitments (see **Appendix A**). As proposed in the Design Excellence Strategy, it is considered more appropriate that the Design Excellence Jury be nominated as being responsible for deciding on the best design arising from the Design Competition.

Heritage Council NSW (26 April 2021)

Heritage Council NSW notes that no changes to the Concept Plan have been proposed since the Heritage Council most recently provided comments on the Modification Application in its correspondence dated 02 February 2021. The Heritage Council considers that its comments provided in the correspondence of 02 February 2021 remain valid and no additional comments are provided at this time by the heritage Council.

No further response to the Heritage Council's correspondence of 26th April 2021 is considered necessary. The matters raised by the Heritage Council in its submission dated 02 February 2021 to the exhibition of the Modification Application have been suitably addressed in the Applicant's Response to Submissions dated 8th April 2021, prepared by Ingham Planning Pty Ltd.



Transport for NSW (28 April 2021)

Transport for NSW (TfNSW) in its further submission dated 28 April 2021, advises that TfNSW has reviewed the Applicant's Response to Submissions and reiterates its condition B6 in the consent issued for the Stage 1 Project Approval, which relates to the approval of an additional retail level to the Westfield Parramatta Shopping Centre.

Condition B6 of the Project Approval requires traffic mitigation works associated with the retail development, including traffic improvement works on the Great Western Highway, between Church Street and O'Connell Street, the intersection of Great Western Highway and Marsden Street, as well as improvement works at the intersection of Church Street and Campbell Street.

The Applicant's Modification Application relates to the Concept Approval for the office tower building envelope component of the development and does not seek any variation of the Project Approval issued for the additional retail level. Further, the modification to relocate and enlarge the office tower envelope approved in the Concept Approval does not propose any increase in off-street parking or traffic generation, compared to the Concept Approval for the office tower building envelope, as originally issued.

TfNSW has identified road improvements it determined would be needed, as a result of traffic generation associated with the retail component of the development. This was addressed by the imposition of Condition B6 within the Project Approval issued for the retail component. There is no existing condition for traffic improvement works in the Concept Approval. There is also no nexus between the proposed relocation and enlargement of the office tower building envelope and the nominated road improvement works contained in Condition B6 of the Project Approval for the retail component of the development that is the subject of the Concept Plan Approval.

Potential inclusion of conditions relating to road improvements that may, or may not be required, in relation to any future office tower developed within the building envelope are matters that should be addressed in the assessment of a Development Application for the future office tower, rather than within the Concept Approval. This situation is acknowledged by TfNSW, who indicate in their further submission that the above road improvement works should be delivered by the proponent prior to the issue of a Construction Certificate for Stage 1.3. Stage 1.3 is the construction of the additional retail level.

TfNSW have requested that the Concept Approval be conditioned to require that as Part of the Stage 2 development application, i.e. the construction of the office tower within the proposed development, the proponent prepare a draft Loading and Servicing Management Plan (LSMP), a draft Green Travel Plan and a draft Construction Pedestrian and Traffic Management Plan (CPTMP). The Applicant has no objections to conditions being imposed on the Concept Approval requiring that drafts of a LSMP, Green Travel Plan and CPTMP be prepared and included with the development application for the future office tower.



NSW Government Architect (29 April 2021)

The Department of Planning Industry & Environment invited the NSW Government Architect to provide a further submission responding to the Applicant's Response to Submissions dated 8th April 2021. No further response has been received from the NSW Government Architect. Issues raised by the NSW Government Architect in their original response to the exhibition of the Modification Application have been addressed in the Applicant's Response to Submissions, dated 8 April 2021, as well as in our above response to Parramatta City Council's further response of 23 April 2021, with respect to building bulk, scale height and floor plate size.

Please contact the undersigned should you require any further information in relation to our response to further submissions from Parramatta City Council, TfNSW and NSW Heritage Council NSW. We trust that the Department of Planning Industry & Environment may now complete its assessment of the 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