



# Planning Proposal to amend Parramatta Local Environmental Plan 2011

24 PARKES STREET,  
HARRIS PARK  
AUGUST 2018



<b>QUALITY ASSURANCE</b>	
<b>Project:</b>	<i>Planning Proposal</i>
<b>Address:</b>	<i>24 Parkes Street, Harris Park</i>
<b>Council:</b>	<i>City of Parramatta</i>
<b>Author:</b>	<i>Think Planners Pty Ltd</i>

<i>Date</i>	<i>Purpose of Issue</i>	<i>Rev</i>	<i>Reviewed</i>	<i>Authorised</i>
<i>June 2018</i>	<i>Draft Issue for Internal Review</i>	<i>Draft</i>	<i>LK/SF</i>	<i>AB</i>
<i>August 2018</i>	<i>Updated Draft Issue for Client</i>	<i>Draft</i>	<i>LK/SF</i>	<i>AB</i>
<i>August 2018</i>	<i>Final Issue for Council</i>	<i>Final</i>	<i>AB</i>	<i>AB</i>

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## INTRODUCTION

This document, and the revised Planning Proposal submission, has emerged from the discussions and early assessment of the Planning Proposal on the site. This submission responds to a number of the issues raised and provides for an improved development outcome and is supported by additional documentation.

The purpose of this Planning Proposal is to explain the intended effect and provide a justification for a proposed amendment to the Parramatta Local Environmental Plan 2011 (Parramatta LEP 2011) as well as demonstrate the strategic merit of the amendment proceeding.

**This planning proposal seeks to amend the Parramatta LEP 2011 to allow for the redevelopment of the site for the purposes of mixed use and high-density development by:**

- **Delete the Maximum Height of Building (HOB) under the Incentive HOB Map.**
- **Amending the Maximum Floor Space Ratio control from 4:1 to the prescribed Maximum Floor Space Ratio to 10:1.**
- **Design Excellence Bonus of 15% remains applicable.**
- **Commercial Floor Space of 1:1**

***Total Floor Space Ratio = 12.5:1***

The Planning Proposal relates to a single allotment referred to within this document as the '*subject site*'. The subject site is situated within proximity to the south eastern boundary of the Parramatta town centre and fronts Parkes Street. The subject site is situated within the expanded Parramatta CBD boundary and it located at 24 Parkes Street, Harris Park.

The amendments proposed in this planning proposal are specific to the site and will facilitate a new high-quality mixed use development that will contribute to the housing supply at the edges of the Parramatta city centre and contribute to the renewal of the town centre and character of Parramatta. The proposed amendments are driven by a desire to deliver a better built form outcome for the site and has been the subject of a design review by Urbis and is supported by a series of specialist reports.

The proposed amendments are driven by a desire to deliver a superior urban design outcome for the site which addresses Council's vision for height and density from the centre of the CBD to the South Parramatta Conservation Area but also delivering development which is consistent with the desired future character of Parramatta. The proposed amendments to planning controls will facilitate the delivery of high quality development contributing to much needed housing supply within this strategic centre. The proposal has been the subject of a design review that analyses broader urban design principles as well as site specific reference architecture.

The planning proposal has been prepared in accordance with Section 55 of the Environmental Planning and Assessment Act 1979 and the Department of Planning and Infrastructure (Department of Planning and Environment) document 'A guide to preparing planning proposals' (August 2016).

The Planning Proposal is supported by –

- Urban Design Report (Urbis)
- Architectural Reference Design (Zhinari Architects)
- Wind Analysis (Windtech)
- Flood Report (Cardno)
- Structural Report (Cubitic)
- BCA Compliance Correspondence (Certified)
- Traffic Report (Traffix)
- Photomontage

This planning proposal is submitted prior to Council finalising the Parramatta CBD Planning Proposal. The draft LEP provisions published for the Parramatta CBD comprise controls to allow an incentive Height of Building and Floor Space Ratio.

This planning proposal proposes site specific provisions over 24 Parkes Street, that aligns with the maximum building height and floor space ratio controls set out in the Council's vision for the built form of Parramatta CBD.

Support for the planning proposal is sought; and the subsequent referral to the Department of Planning and Environment for Gateway determination and public exhibition.

## DESIGN COLLABORATION

This Planning Proposal is cognisant of 2 other Planning Proposals for land at 114-118 Harris Street and 26-30 Parkes Street, Harris Park. The planners representing all 3 Planning Proposals are Think Planners Pty Ltd. The 3 Planning Proposal sites are shown in the Figure below. Think Planners have sought to ensure that the designs for each proposal are cognisant of each of the three sites and consistent with the urban design advice received for the development of the three sites.

Figure 1: Aerial photograph of the subject site (Source: Six Maps 2017).



Given the proximity of all 3 sites and the key opportunities as well as constraints that are presented with these proposals, noting a collaborative and thoughtful coordinated built form approach has been followed with the following outcome:

- Background and details on arriving at the best urban design outcome.
- Overall gross floor area for each of the 3 sites.
- Key site access points including vehicular access.
- Open space network including through site links, common open space and public open space.
- Renderings of the streetscape character showing how the entire development block will look when all 3 schemes are developed.
- A coordinated framework of building setbacks and separation distances.
- A coordinated framework of podium and tower locations.

Think Planners Pty Ltd are instrumental in ensuring that a coordinated built form outcome is proposed, based on independent urban design advice from Urbis and architectural input from Zhinar Architects (24 Parkes Street), Project Tourism International Architecture (26-30 Parkes Street) and Alexander Projects (114-118 Harris Street).

The design collaboration outcomes can form the basis of a Development Control Plan. The design affiliation of all three sites seek to outline a vision for the entire development block which will guide all 3 Planning Proposals in delivering a coordinated outcome for the land. The design collaboration is driven by the highest quality urban design outcomes and to ensure that over shadowing does not impact on Experiment Farm and the best development form for the 3 sites is achieved.

## SITE AND LOCALITY DESCRIPTION

### SUBJECT SITE

The subject site is situated on the northern side of Parkes Street and is identified in the aerial photo below.

The subject site is legally defined as the following:

- SP 578 (24 Parkes Street).

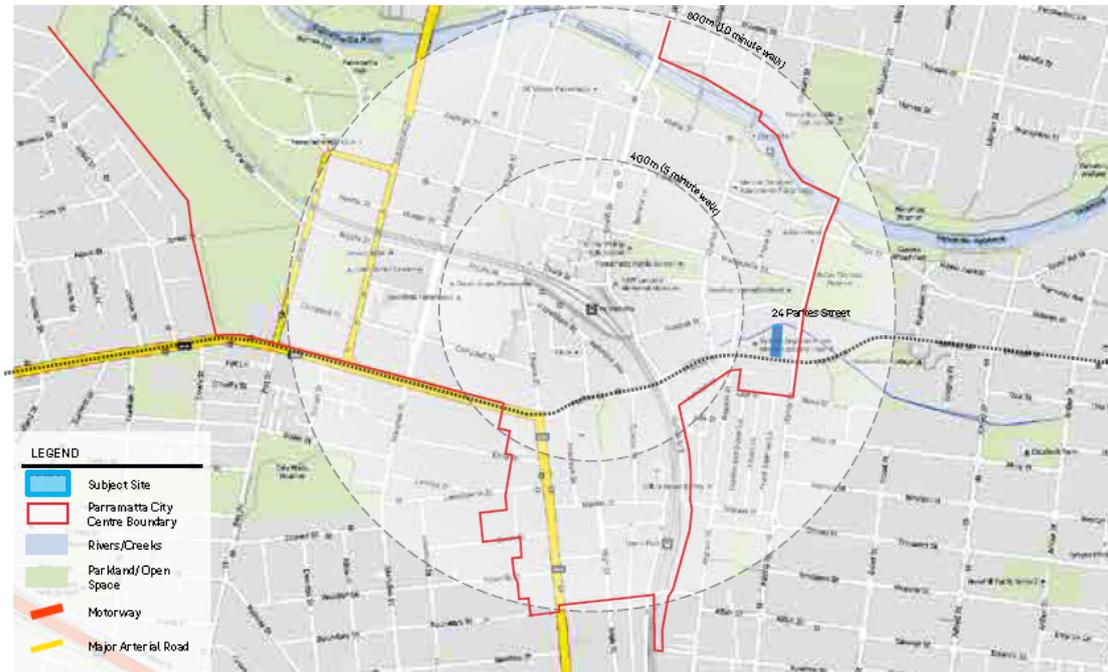
The land has been identified under Parramatta CBD Planning Proposal Amendment to Parramatta LEP 2011 Incentive Map for a 10:1 Floor Space Ratio and no prescribed Incentive Building Height. The aerial photographs provided at Figures 1, 2 & 3 show the subject site and the immediate context.

Figure 1: Aerial photograph of the subject site (Source: Six Maps 2017).



 Subject Site

Figure 2: Aerial photograph- Context of Parramatta CBD (Source: Urbis UDS)



 Subject Site

Figure 3: Land Application Map (Source: Parramatta CBD Planning Proposal)



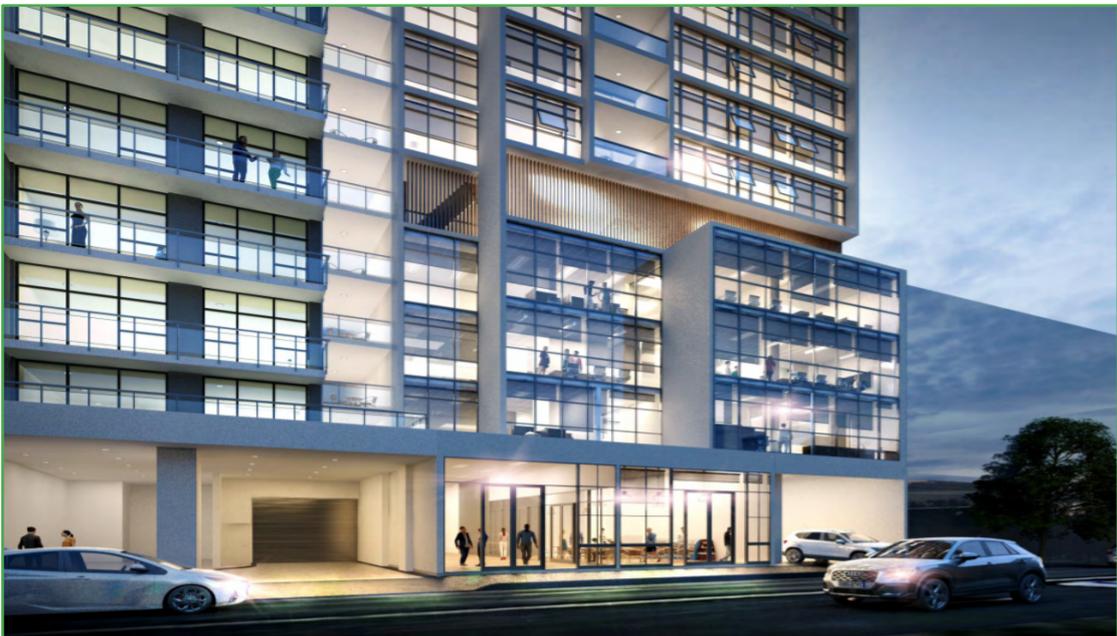
 Subject Site

## CONCEPT DESIGN

The architectural Reference Design plans have been prepared by Zhinar Architects with two extracts including the *Perspective of the Concept Design and Street level interface* from the plans provided below.



Source: Zhinar Architects



Source: Zhinar Architects

## LOCALITY

Situated on the northern side of Parkes Street, the site has a frontage of 20m to Parkes Street. The subject site, 24 Parkes Street has a total site area of 1,663m<sup>2</sup> and is located within proximity to the south eastern edge of the Parramatta CBD.

To the east of the site is the mid-sized Robin Thomas Reserve, which is one of the few city centre open space areas and contributes to the character and amenity of the area.

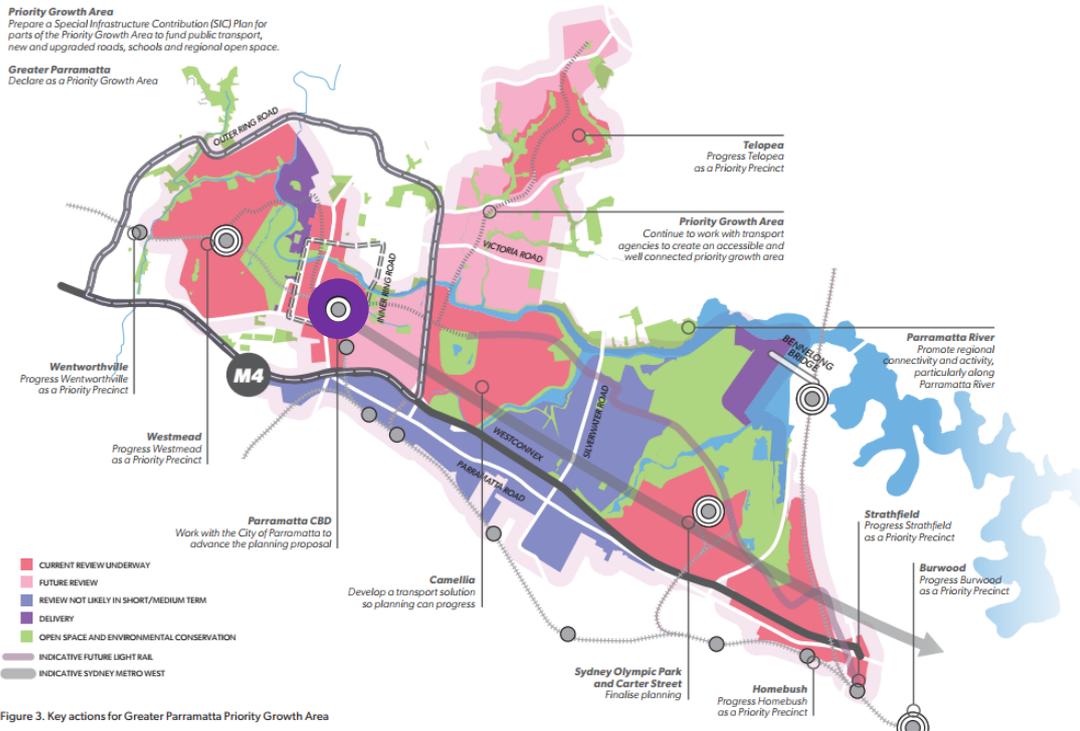
To the south of the site, across Parkes St, are apartment buildings that are estimated to date from the 1970s and 1980s. To the north of the site Clay Cliff Creek (an open concrete channel) adjoins the boundary.

The subject land parcel is well serviced by bus routes and has direct access to a bus stop out the front of the site on Parkes Street. Routes 909 to Bankstown and M92 to Sutherland both run past the site and connect to the bus interchange.

Additionally, the Parramatta bus Interchange is located at the Train Station, which approximately 600m (8-minute walk) from the site which is serviced by most bus routes in Parramatta. Ferry services run from Parramatta to Circular Quay or Darling Harbour via Cockatoo Island and Olympic Park. These services are generally infrequent with an hour and twenty-minute journey time and therefore operate more as a tourist service than a commuter service.

The immediate locality is characterised by a mix of uses and built form. To the west of the site is generally aged building stock that is currently undergoing a transition in character as a result of development approvals under construction and recent Planning Proposals at 14-20 Parkes St Parramatta. A strategic map extract is provided below demonstrating the sites location in Parramatta CBD.

Figure 3: Strategic Context Map (source GOP)

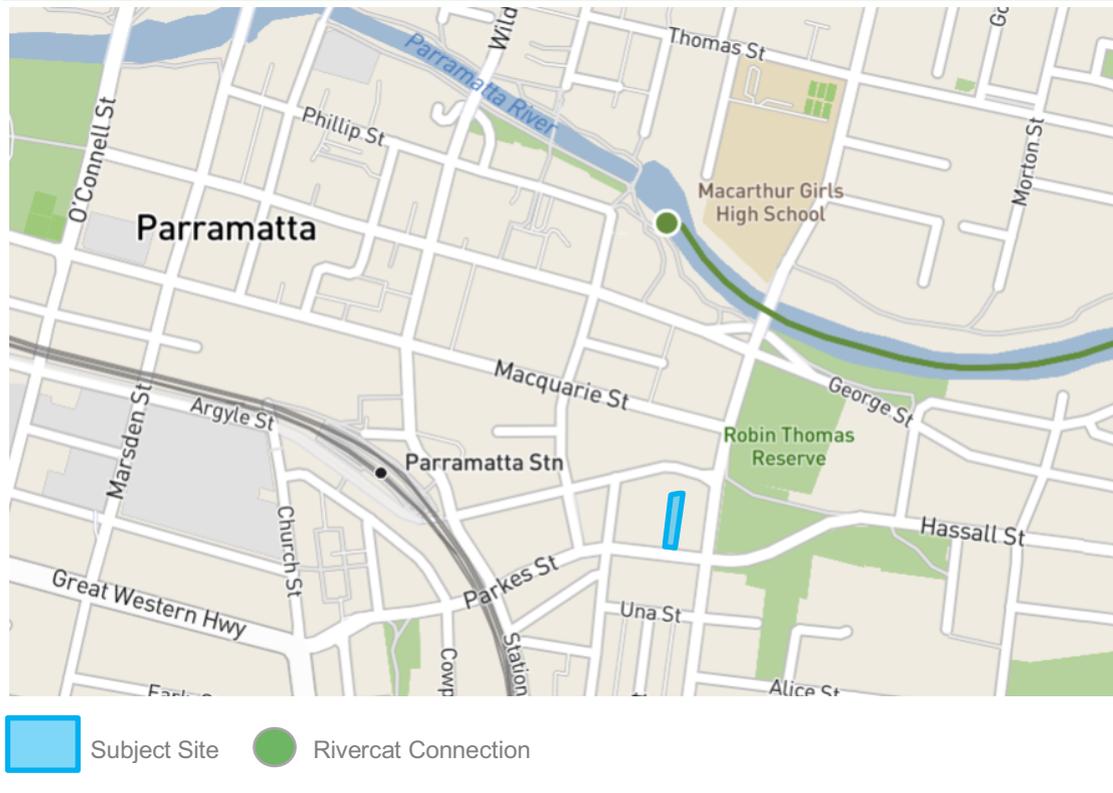


 Subject Site

The locality is undergoing a significant period of change consistent with its role as Sydney's second CBD and its purpose as a strategic centre for employment and housing.

Parramatta CBD is a major transport node with a well located and well-resourced rail and bus interchange. The CBD also benefits from Rivercat connection to Sydney CBD the site is located approximately 600m (approximately an eight-minute walk) from Parramatta Train Station which provides a high-frequency 30-35-minute journey to Sydney CBD.

Figure 4: Parramatta Wharf: Rivercat Connection 1 (Source: Transport NSW)



This location is well serviced by schools, tertiary institutions, child care centres, community services, recreational and sporting facilities and an established commercial centre. Furthermore, the locality has excellent connectivity with access to several key arterial road networks including George Street, Church Street and the M4 Motorway as well as regular public transport services.

Parramatta is undergoing a momentous transformation into Metropolitan Sydney’s Central City resulting from the policy direction from NSW Department of Planning and Environment, Greater Sydney Commission and the City of Parramatta Council. Changes to the planning controls in Parramatta CBD have resulted in several substantial mixed-use development proposals which have either been approved by the Council or are under consideration.

Photographs overleaf and in the following pages are provided to illustrate the context of the locality.

Photograph 1: Shows the subject site as viewed via Parkes Street



Photograph 2: Construction taking place along Parkes Street and Wigram Street



Photograph 3: Shows recently constructed tower on Parkes Street



Photograph 4: Shows the subject site as viewed via Harris Street



Photograph 5: Recently constructed development at 14-20 Parkes Street



Photograph 6: Shows the Albion Hotel as viewed via Harris Street



Photograph 7: Shows the older style residential flat development on Harris Street



## LOCAL PLANNING FRAMEWORK

### ZONING

The land is currently zoned B4 Mixed Use and this Planning Proposal does not seek to amend the existing zoning.

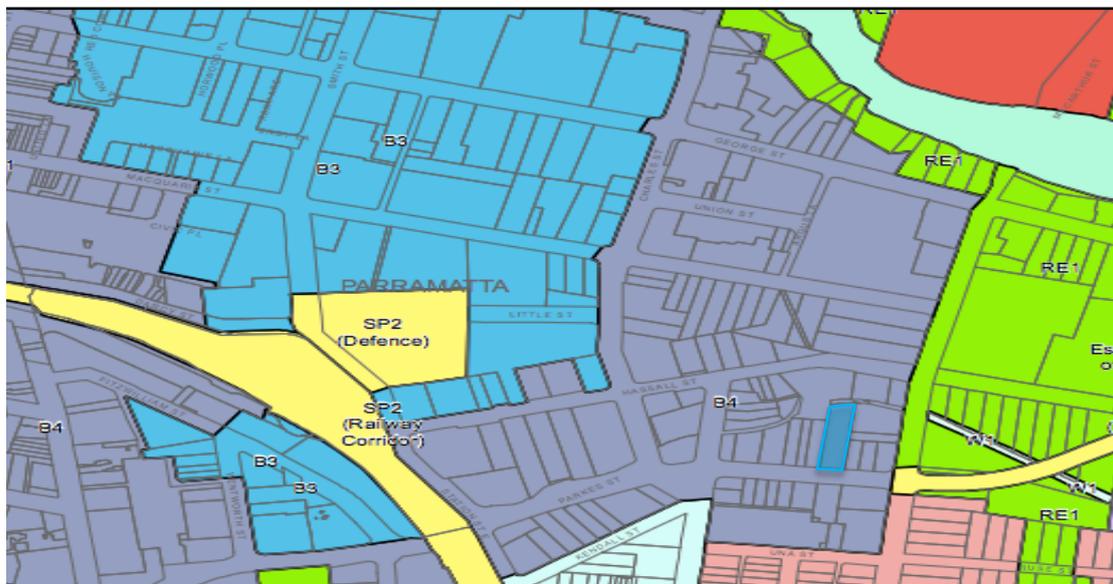
#### Parramatta Local Environmental Plan 2011

##### Zone B4- Mixed Use

**Permitted with consent:** Boarding houses; Building identification signs; Business identification signs; Centre-based child care facilities; Commercial premises; Community facilities; Educational establishments; Entertainment facilities; Function centres; Hotel or motel accommodation; Information and education facilities; Light industries; Medical centres; Passenger transport facilities; Recreation facilities (indoor); Registered clubs; Respite day care centres; Restricted premises; Roads; Seniors housing; Shop top housing; Water recycling facilities; Any other development not specified in item 2 or 4.

Among other things, development for the purpose of Shop Top Housing and Commercial Premises are permissible with consent in this zone. Figure 6 is an extract from the land zoning map for Parramatta LEP 2011.

Figure 6: Extract from Parramatta LEP 2011 Land Zoning Map Sheet LZN\_10

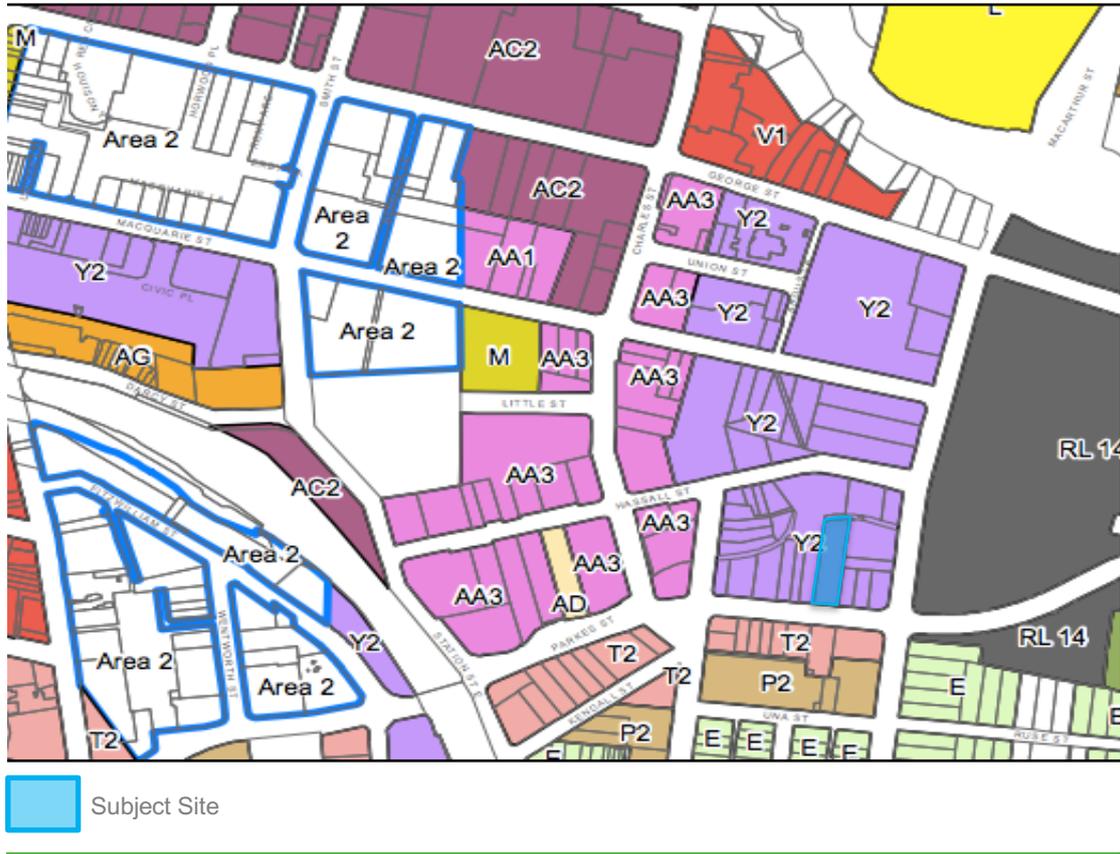


 Subject Site

**BUILDING HEIGHT**

The Height of Buildings Map for the Parramatta LEP 2011 indicates that the maximum building height permitted on the subject site is 54m. Figure 5 in the below is an extract from the Height of Buildings Map for Parramatta LEP 2011.

**Figure 7: Extract from Parramatta LEP 2011 Height of Buildings Map Sheet HOB\_14**



This Planning Proposal seeks to delete the maximum building height controls for this site. This is aligned with the Parramatta CBD Planning Proposal.

## FLOOR SPACE RATIO

The current Floor Space Ratio Map for the Parramatta LEP 2011 indicates that the maximum floor space ratio for a building on the subject site 4:1. Figure 8 below is an extract from the Floor Space Ratio Map for Parramatta LEP 2011.

**Figure 8: Extract from Parramatta LEP Floor Space Ratio Map Sheet FSR\_10**



This Planning Proposal seeks to amend the maximum floor space ratio to 10:1 as shown in the following section of this report and as also aligned with the Parramatta CBD Planning Proposal.

## HERITAGE

There are no heritage items located within the site boundaries however, heritage listed items are listed within proximity of the site as demonstrated via Figure 9 below.

**Figure 9: Extract from Parramatta LEP 2011 Heritage Map Sheet**



 Subject Site

24 Parkes Street is not nominated as a heritage item or within a heritage conservation area. The site is within walking distance of a cluster of heritage sites that are collectively known as the Harris Park Heritage Walk. To the south and east of the site are 3 conservation areas being Harris Park, Experiment Farm and Elizabeth Farm. Due to the proximity to the site Harris Park and Experiment Farm conservation areas have been identified as potentially impacted by development on this site. This matter is discussed in more detail further in this report.

## PLANNING PROPOSAL FOR PARRAMATTA CBD PRINCIPLES AND INITIAL CONTROLS

Council on 27 April 2015 adopted the Parramatta CBD Planning Strategy. The strategy led to the preparation of a CBD Planning Proposal which was adopted by Council in April 2016.

The CBD Planning Proposal establishes a vision for growth that expands and intensifies the commercial core, along with an expanded and higher density mixed use and residential focus.

Key elements of the Planning Proposal relevant for the subject site include –

- Base and incentive FSR and Height controls.
- A sliding scale for FSR based on the underlying size of land.

Under the current PLEP 2011, most sites in the Parramatta CBD have one height control and one FSR control.

This Planning Proposal retains in the main these heights and FSR as shown on the existing Height of Buildings Map and FSR Map and proposes to introduce a second height and FSR control.

Consequently, most sites within the Parramatta CBD Planning Proposal boundary will have two FSR and two height controls and these are to be known as ‘base FSR and height’, and ‘incentive FSR and height’. The proposed incentive FSR control is generally 10:1 for land within the CBD Core and 6:1 for land north and south of the CBD Core. It is noted the land parcel falls under the 10:1 incentive.

## Building Height

This planning proposal seeks to permit development with no prescribed building height this is evident as per Parramatta CBD Planning Proposal incentive height map as demonstrated below

**Figure 11: Parramatta CBD Planning Proposal showing incentive Height**

**Parramatta CBD Planning Proposal — Incentive Height of Buildings Map (IHB) — Feb 2016**



## Floor Space Ratio

This planning proposal seeks to permit development with a maximum floor space ratio of up to 10:1. Figure 12 below illustrates the incentive FSR.

**Figure 12: Parramatta CBD Planning Proposal Showing Incentive FSR**

### Parramatta CBD Planning Proposal — Incentive Floor Space Ratio Map (IFS) — Apr 2016



The proposed incentive Floor Space (IFS) control:

- Reflects the Council Resolutions from 14 December 2015, 8 February 2016 and 11 April 2016 for land within the City Centre Core to have a IFS of 10:1 and sites within the peripheral areas to have an IFS of 6:1 except sites that are subject of a gazetted Planning Proposal or for sun access or heritage reasons.*
- Applies to all land zonings and development permitted within the B3 Commercial Core, B4 Mixed Use and R4 High Density Residential Planning Proposal – Parramatta CBD 28*
- Can be achieved provided the development includes community infrastructure.*
- Can be increased by 15 per cent provided design excellence is achieved. The 15% bonus can only be applied once, either to the base FSR or IFS, but not both.*
- Is subject to site area thresholds (i.e. FSR Sliding Scale) which may result in a reduction of the maximum FSR due to the size of the site, either: i. FSRs up to*

6:1 – Minimum site area 500sqm up to 1,300sqm ii. FSRs of 10:1 – Minimum site area 800sqm up to 1,600sqm

- f) For sites that are subject to the site area thresholds (i.e. FSR Sliding Scale), the IFS as shown on the map, may still be achieved provided certain conditions relating to design excellence, compliance with SEPP 65 and activated street frontages are met.
- g) May not be achievable on some sites due to sun access protection and airspace operation controls also proposed in this Planning Proposal.

The table provided below demonstrates ‘incentive FSR and height’ as per Parramatta CBD Planning Proposal are proposed to Floor Space Ratio of Parramatta LEP 2011.

PART A – FSR UP TO 6:1			
FSR Shown on Map	Site is less than or equal to 500sqm	Site is greater than 500sqm but less than 1,300sqm	Site is equal to or greater than 1,300sqm
4:1	3:1	(3+1X):1	4:1
6:1	4:1	(4+2X):1	6:1
PART B – FSR OF 8:1 OR GREATER			
FSR Shown on Map	Site is less than or equal to 800sqm	Site is greater than 800sqm but less than 1,600sqm	Site is equal to or greater than 1,600sqm
10:1	6:1	(6+4Y):1	10:1

**Notes:**

Where X = (the site area in square metres – 500)/800;

Y = (the site area in square metres – 800)/800

**Table 1 - Sliding scale for Floor Space Ratio**

This FSR sliding scale is shown in Table 1 allows for flexibility to achieve maximum FSR whilst complying with solar access and design excellence controls; and is consistent with the resolution adopted by Council in September 2014 in relation to the ‘Parramatta City Centre Planning Framework Study.

Table 1 states an FSR showed on the Incentive FSR map sheet of 10:1 is accepted only with a site area equal to or greater than 1,600m<sup>2</sup>.

## BACKGROUND

### TECHNICAL REPORTS

#### **Urban Design Study**

An urban design study has been prepared by Urbis Pty Ltd that has considered –

- The existing planning context;
- An urban context analysis; and
- A built form strategy.

The analysis undertaken throughout the study identifies a number of “key insights” that have informed the final urban design / built form proposal for the site.

The summarised version of the study is provided below with all rights reserved to the key points demonstrated belonging to Urbis Pty Ltd. The Urban Design Study is subject to copyright as permitted under the Copyright Act 1968. It is noted permission is granted regarding information from the study to incorporate it in this Planning Proposal.

The Assessment has reviewed the design context and considered the best possible outcome on site, particularly having regard to the arrangement of land proximate to the site, and the best envelope arrangement for buildings over the land parcels known as 24 Parkes, 26-30 Parkes and 114-118 Harris Streets.

Situated within the urban block which marks the south eastern arrival into the CBD, the site responds to the rapid urban transformation occurring in the Parramatta city centre's skyline as a result of the planning context. Already several sites within the urban block have been developed or have development approval. However, there are three remaining sites in the urban block, all located in the south-eastern corner comprising the following.

- 24 Parkes Street, Harris Park (Subject site)
- 26-30 Parkes Street, Harris Park (Adjoining site)
- 114-118 Harris Street, Harris Park (Corner of Parkes and Harris Street)

## URBAN BLOCK

The urban block within which the subject site is located has seen significant amount of development activity over recent years since the introduction of the Parramatta CBD planning strategy, including:

*Approved Development Proposals on:*

- 39-43 Hassall Street; and
- 14-20 Parkes Street (Planning Proposal).

*Approved Development Under Construction on:*

- 113-117A Wigram Street & 23-29 Hassall Street; and
- 22 Parkes Street, Parramatta.

The approved development proposals and approved development under construction are demonstrated below



*Source: Urbis Pty Ltd*

The current built form heights in the urban block vary from 17 to 44 storeys with FSR ranging from 4.0:1 to 11.5:1. In the context of this emerging growth, the overall massing and built form response of 24 Parkes Street needs to consider how the building will sit within the overall context of the urban block.

Additionally, emerging development sites, commercial development and residential development are demonstrated overleaf;

*Emerging Development Sites at:*

- 26-30 Parkes Street; and
- 114-118 Parkes Street

*Major Commercial Development:*

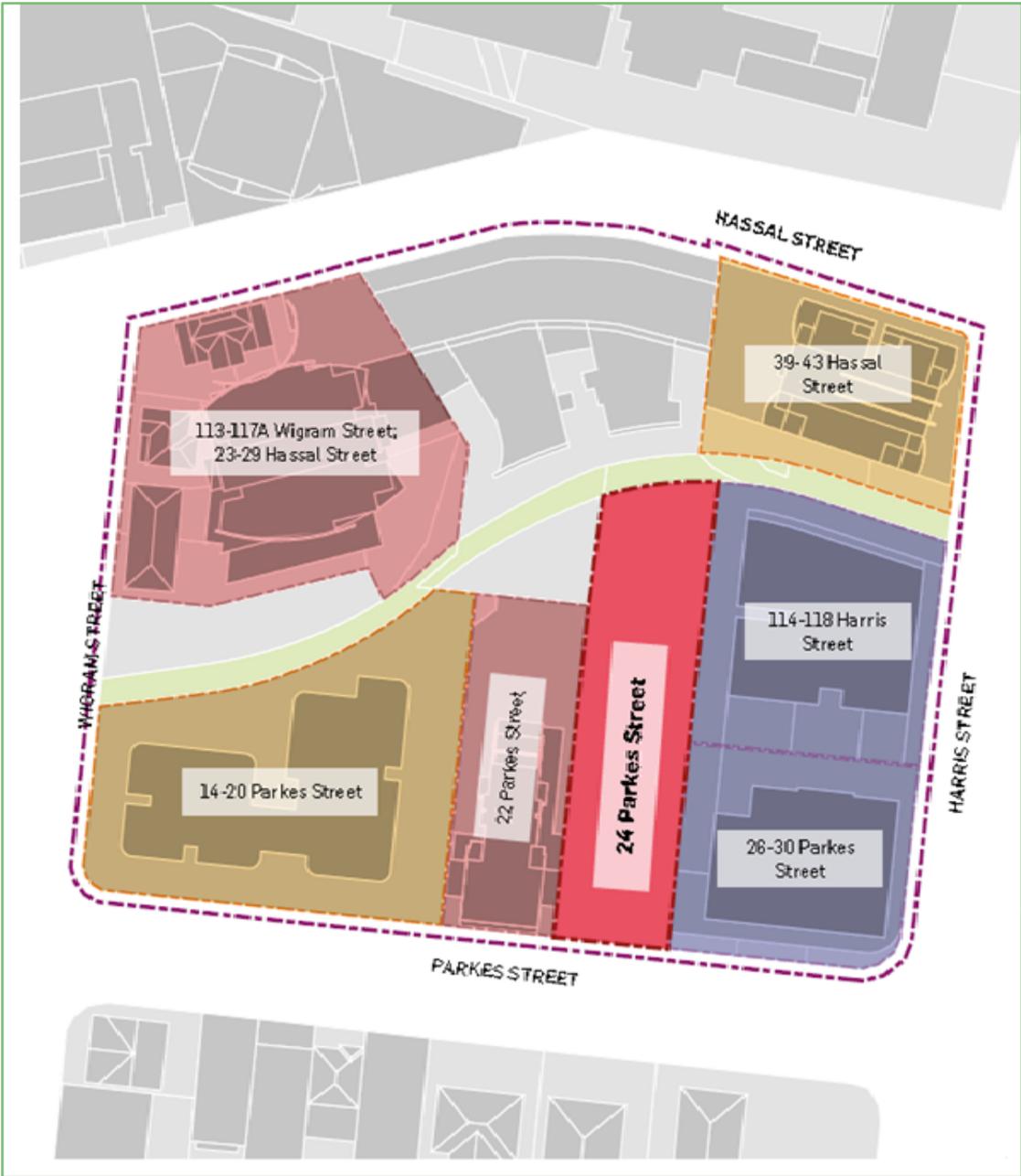
- Eclipse Tower: 20 storeys
- Westfield Tower: 20 storeys
- 89 George Street: 14 storeys
- 105 Phillip Street 13 storeys
- 111 George Street 17 storeys

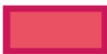
*Major Residential Development:*

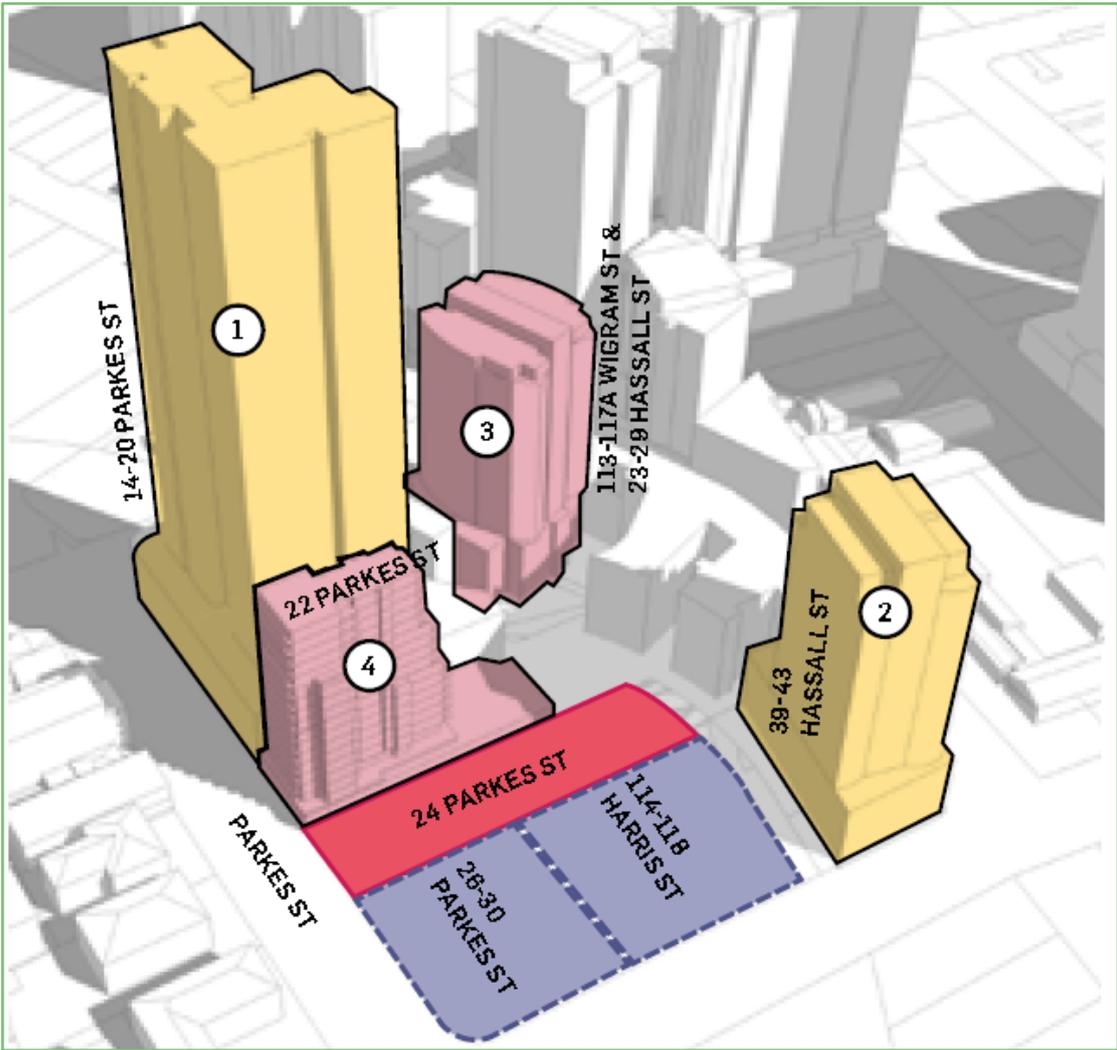
- Altitude Meriton Development- 330 Church Street
- V by Crown- 45 Macquarie Street
- B1 Tower- 118 Church Street
- Focus- 6-10 Charles Street

The subject site is in a prime public transport corridor where there is an extensive variety of sustainable transport options available, including trains, buses, walking and cycling. It is noted the locality has excellent connectivity with access to several key arterial road networks including George Street, Church Street and the M4 Motorway as well as regular public transport service.

Furthermore, it is noted extracts from Urbis Pty Ltd Urban Design Study are provided overleaf demonstrating the subject block and the overall greatest outcome on site.



LEGEND	
	24 Parkes Street
	Approved Development
	Approved Development under Construction
	Emerging Development Sites
	Transitioning Urban Block

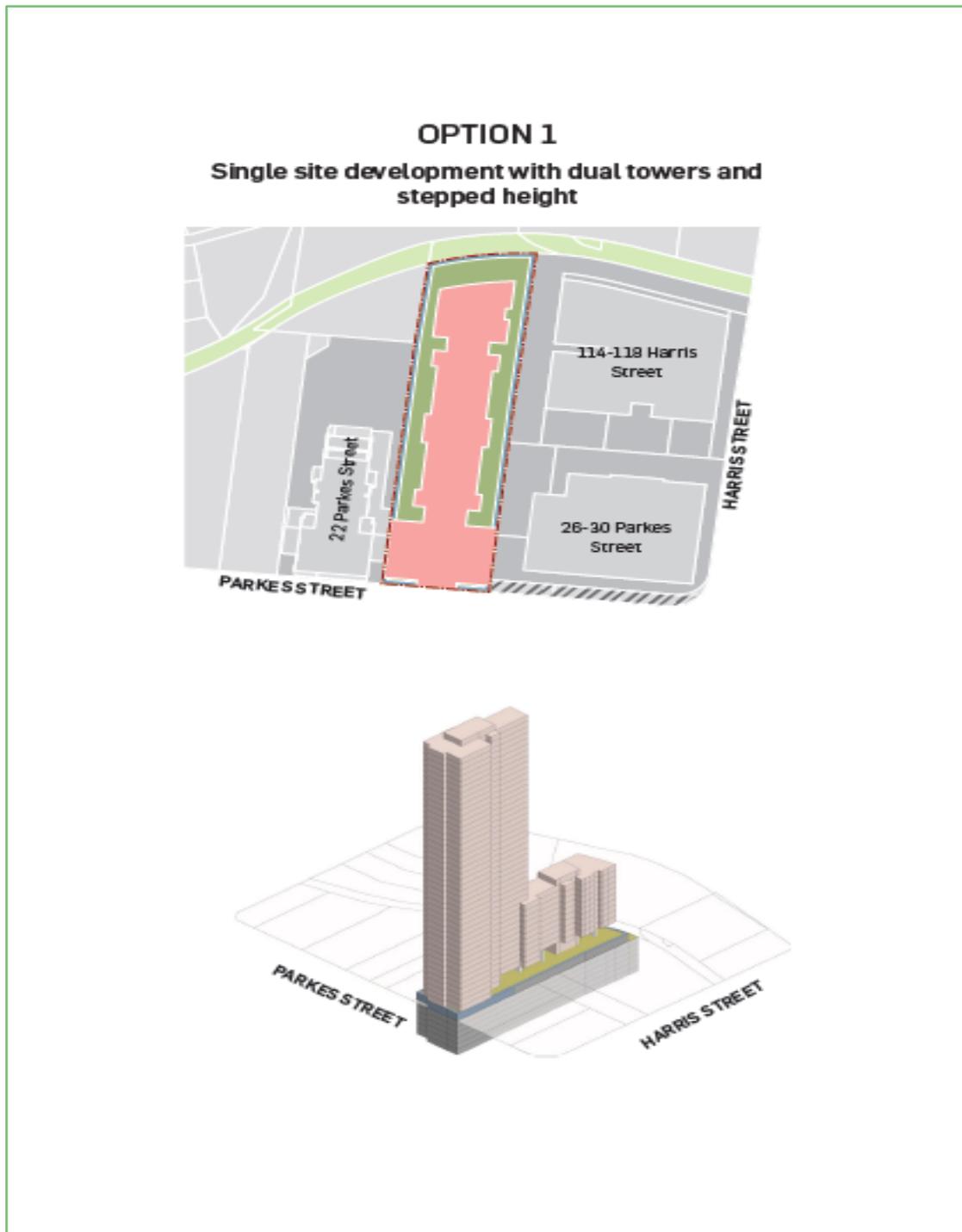


LEGEND	
	24 Parkes Street
	Approved Development
	Approved Development under Construction
	Emerging Development Sites
	Transitioning Urban Block

## BUILT FORM OPTION STUDY

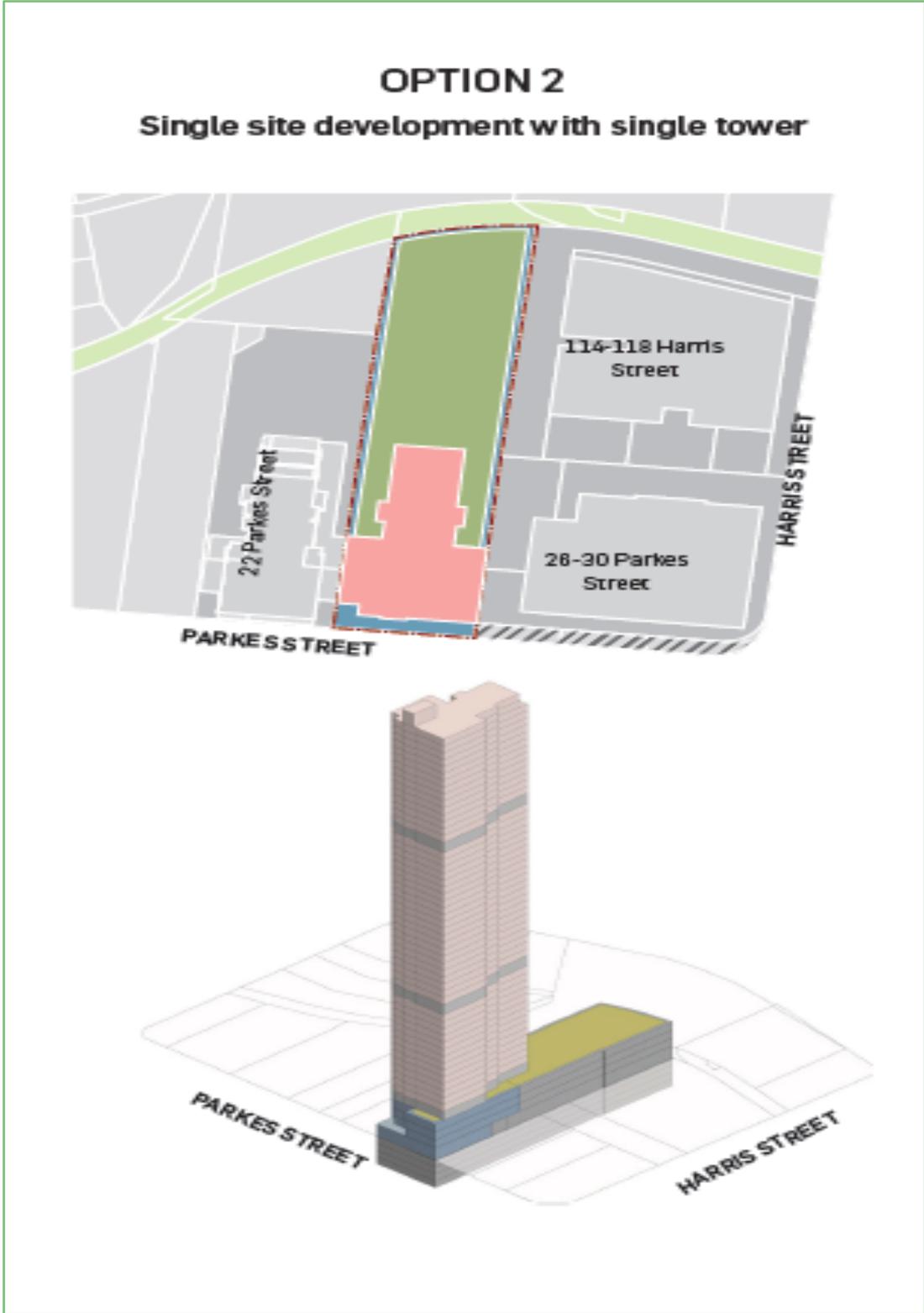
Three potential scenarios have been investigated for the development of the three sites and to determine the optimal built form arrangement for the relevant land parcels.

- **Option 1:** Single site development with dual towers and stepped height



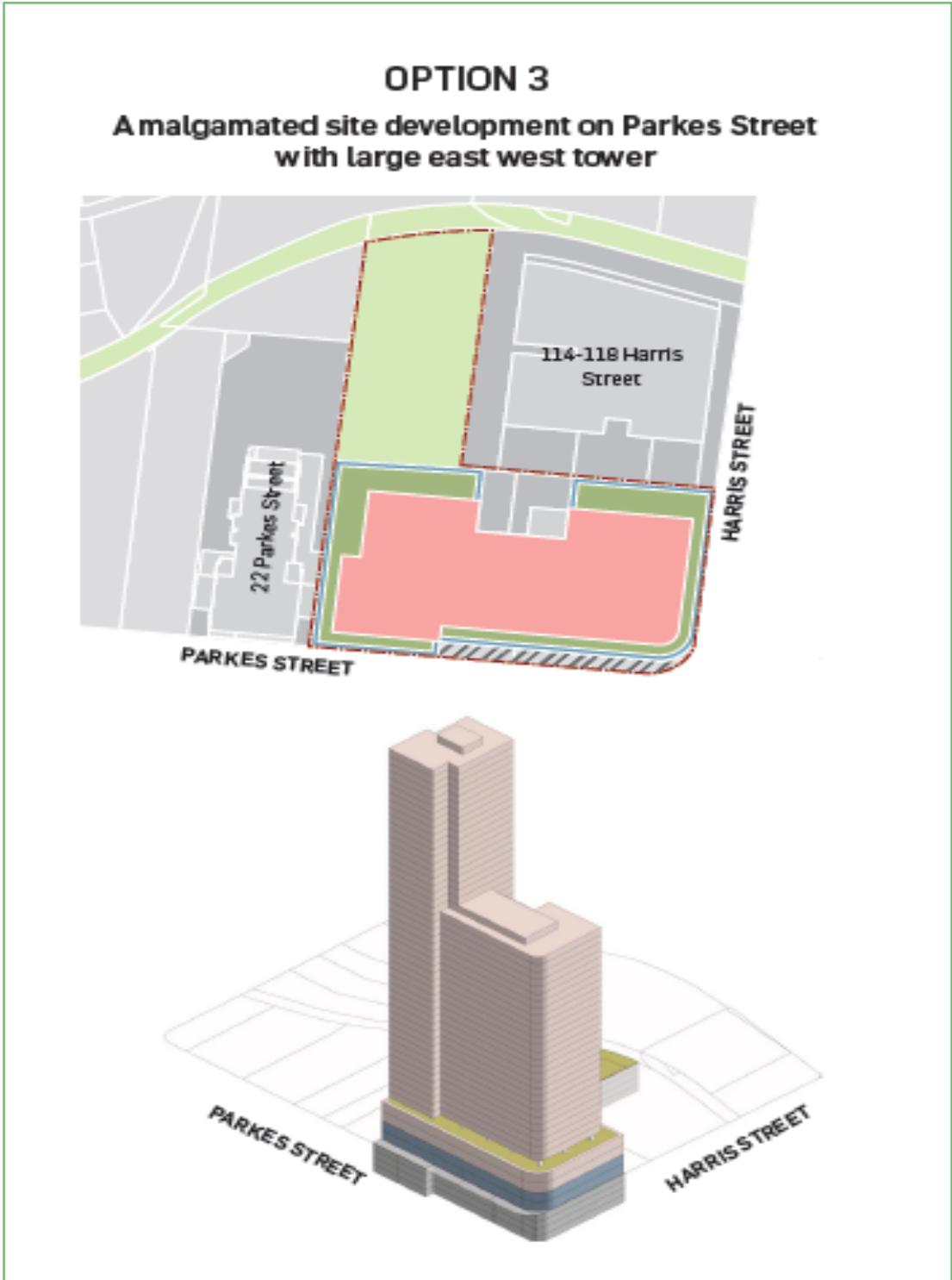
*Source: Urbis Pty Ltd: Urban Design Study*

- *Option 2*: Single development with single tower.



*Source: Urbis Pty Ltd: Urban Design Study*

- *Option 3*: Amalgamated development site with large east west tower.



*Source: Urbis Pty Ltd: Urban Design Study*

The analysis for each option is undertaken having regard to the following aspects:

- Visual interest within the urban block as a city centre gateway;
- Streetscape composition on Parkes Street;
- Provision of open space and amenity; and
- Solar access and the likely shadow impacts on the Experiment Farm Reserve and Cottage, between the hours of 10am to 2pm.

A preferred option has been derived from the comparison of the three built form options on 24 Parkes Street. The built form massing of Option 2 is demonstrated to have a better response to the urban block context, noting:

- Built form design with a more sensible approach to the emerging built form
- Better representation of a gateway location at the southeast corner of Parramatta City Centre
- Balanced streetscape composition;
- Contribution to the open space and residential visual amenity;
- No overshadow impact to the Experiment Farm Reserve and Cottage; and
- The proposed built form has adopted setback and facade treatment strategies; and perform excellent solar access to 77% of the residential units and 94% of the communal open space to comply with the Apartment Design Guide (ADG) and the DCP Controls.

In summary, Option 2 has been selected based on an assessment against the key principles:

- City centre gateway;
- Balanced streetscape composition;
- Continuous podium-built form;
- A contiguous green space;
- Built form articulation;
- Communal open space; and
- Street activation

#### **City Centre Gateway:**

The tower punctuation provided by 24 Parkes St results in a varied skyline to the urban block and creates an interesting visual element to mark this corner. This configuration forms the south eastern gateway into the city centre. The Parkes and Harris Street Corner.

**Balanced Streetscape Composition:**

Land ownership patterns along the Parkes Street frontage have resulted in larger tower footprints for sites on the corner and the existing narrow tower form for the site at 22 Parkes Street. In this context, 24 Parkes Street proposes a slender tower to be read as a single streetscape element connected to and with 22 Parkes Street. The result is a balanced streetscape composition fronting Parkes Street.

**Continuous podium-built form:**

24 Parkes Street proposes four storeys articulated podium with continuous 5m tall ground floor fronting the street. This aligns with the approved podium at 22 Parkes Street. The corner developments at 14-20 and 26-30 Parkes Street propose four storeys street walls respectively “book-ending” the block. The existing and proposed developments all include building frontage with zero set back with active uses at the ground floor to encourage passive surveillance and well-defined streets. The proposed development of 24 Parkes Street transitions between the adjoining buildings to create a more intimate, human-scale street wall in the centre of the block.

**Contiguous Green Space:**

24 Parkes Street responds to the setting of the adjoining Clay Cliff Creek Corridor located at the rear of the property. The overall massing of the tower element away from the creek corridor creates generous communal open space and residential visual amenity; and maximise northern access to sunlight.

**Built-form articulation:**

The podium and tower massing is articulated to respond to the adjoining 22 Parkes St built form to better address the facade and street frontage. Vertical massing of the facade breaks down the tower into smaller visual elements that respond to form and function.

**Communal open space:**

24 Parkes St provides multiple communal amenities at the podium rooftop and the tower level breaks which contributes to communal / residential spaces, as well as introducing visual relief in the urban form. The north facing rooftop podium allows ample solar exposure throughout the day to the open space and adjoining buildings.

### Street activation:

24 Parkes St proposed building creates a safe and vibrant human scale streetscape through following strategy:

- Retail and entry frontage to Parkes St to activate the streetscape and provide passive surveillance;
- Carefully transitioned the podium-built form from 0m lot-line at the ground level and setback at the upper podium responding the adjoining-built forms;
- Transparent facade expression at the podium level to provide 'light' effect to the street.

### VARIED SKYLINE IN PARRAMATTA CBD GATEWAY DEVELOPMENT

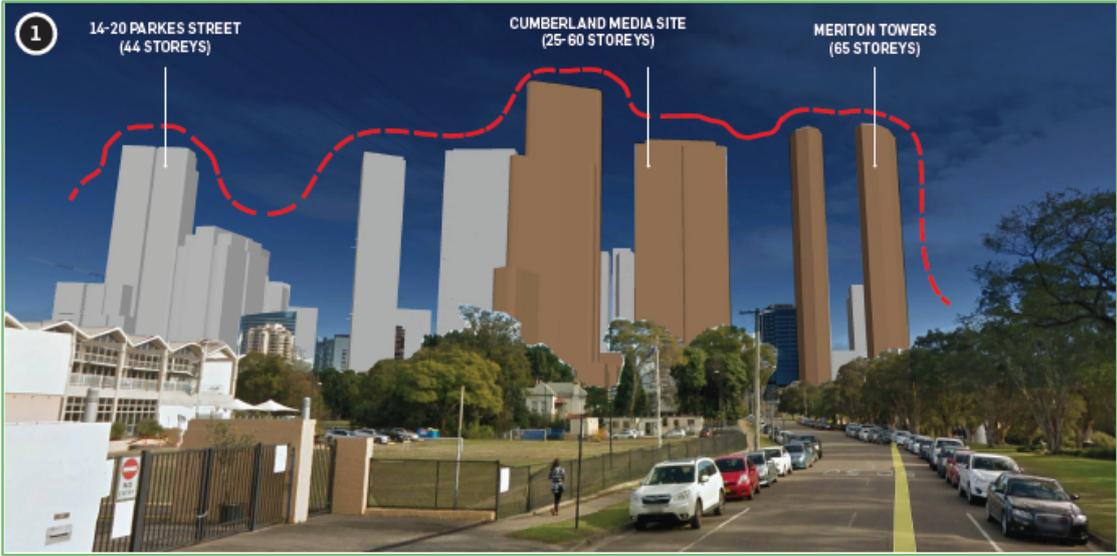
The urban design study analyses the established and emerging pattern of heights in the Parramatta CBD. Contrary to earlier visions for the city where a “bell curve” of heights was postulated, that would result in the edges of the city having shorter buildings to those in the centre of the city, the CBD strategy, and relevant approvals demonstrate a varied skyline in Parramatta CBD. This is also apparent at the corners of the CBD.

The emerging Parramatta CBD development has been characterised by high density developments with varied heights including:

- 25 - 60 storeys Cumberland media site and 65 storeys Meriton towers to the north eastern gateway; and
- 54 storeys Meriton Altitude towers,
- 41 storeys The Lennox and
- 55 storeys 8 Phillip Street to the north western gateway.

The south west entry to the CBD is also seeing a radical transformation and variety of heights in Planning Proposals, Design Competitions and DA's for land in the vicinity of Church Street (Heartland Holden, Ford and Ecoworld sites).

The proposed tower will be visible in the skyline at the important entry point to the city and will make up 1 of a number of towers of varied height on the south eastern entry to the CBD; being consistent with the form and varied height of towers constructed or approved in other parts of Parramatta CBD.



*Varied tower heights in Parramatta CBD North East Edge- George Street (East)*  
*Source: Urbis Pty Ltd: Urban Design Study*



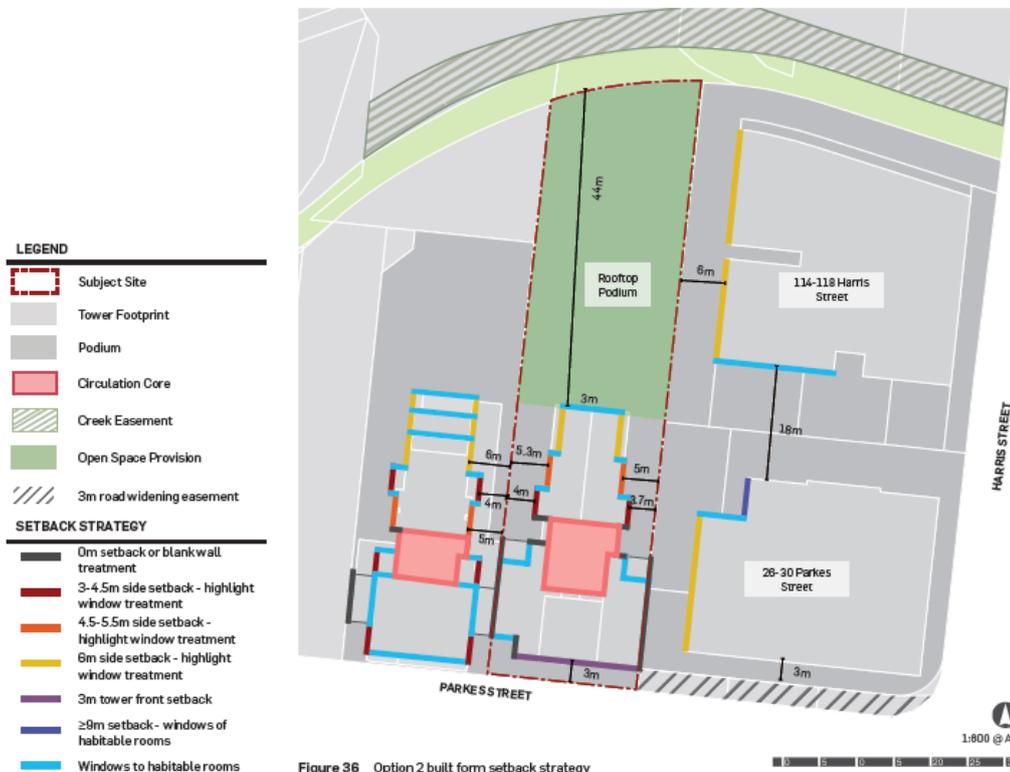
*Varied tower heights in Parramatta CBD North West Edge- Church Street (North)*  
*Source: Urbis Pty Ltd: Urban Design Study*

## DESIGN RESPONSE TO ADG

The subject site is a long, narrow site with a street frontage of 20.3m and a depth of 82m, which is like the proportions of the adjacent site 22 Parkes Street.

The subject site proposes a 0m setback to the ground level podium which fronts Parkes Street and maintains the street frontage continuation with an additional 3m setback for the tower building from level 4 and above as demonstrated via an extract provided from the urban design study prepared by Urbis Pty Ltd.

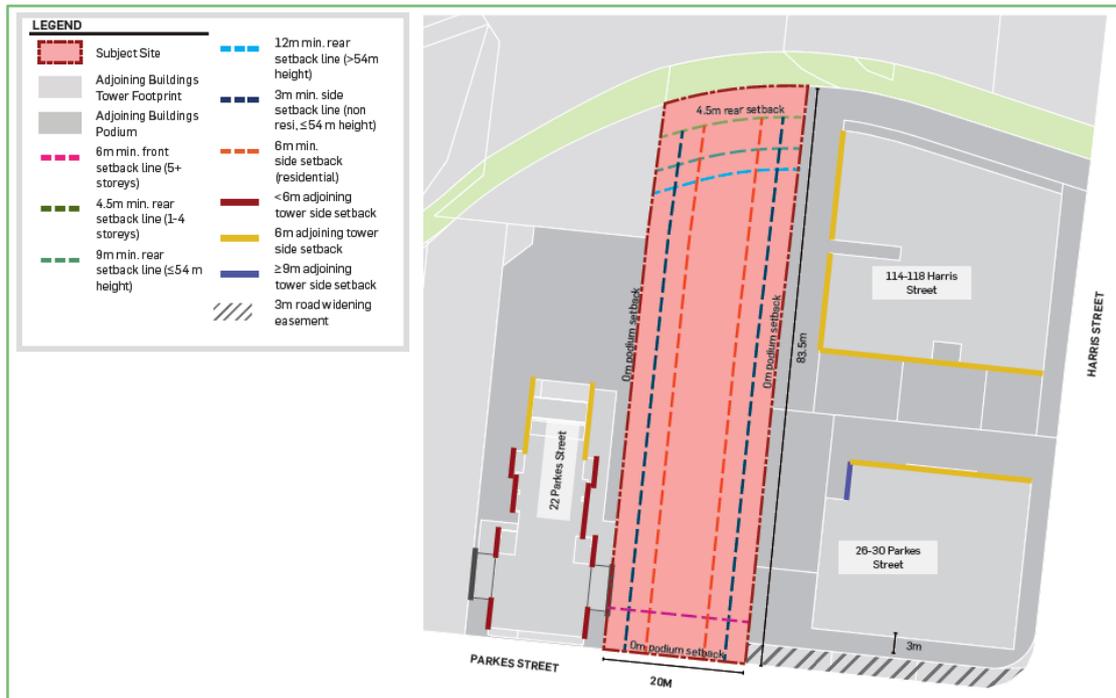
The following diagram illustrates the setback strategy undertaken within the proposed building and illustrates the intended connection to 22 Parkes Street.



Source: Urbis Pty Ltd: Urban Design Study

## ZERO LOT LINE SETBACK BETWEEN 22 PARKES STREET AND 24 PARKES STREET

The subject site proposes a 0m setback to the ground level podium and to its neighbouring development 22 Parkes Street, Harris Park.



Source: Urbis Pty Ltd: Urban Design Study

The proposal incorporates a 0m side setback with blank wall treatment which is applied to the front part of the tower to respond to the adjoining development at 22 Parkes Street. Noting that 22 Parkes Street has been recently constructed and at the time of approval was intentionally designed with a zero setback and blank wall to allow a future building at 24 Parkes St to also have a zero setback and adjoin to 22 Parkes Street.

It is noted setbacks range from 3.5m - 6m with privacy screening and highlighted windows to be adopted to the rear part of the tower ensuring amenities and visual privacy is maintained to the adjoining buildings.

Furthermore, the adjoining approved DA sites including 14-20 Parkes Street and 22 Parkes Street both apply a 0m rear setback. Considering the location of the sites and the mere fact they are within high density CBD environment a rear setback may not be applicable. 24 Parkes Street may apply a similar rear setback.

## PARRAMATTA DEVELOPMENT CONTROL PLAN 2011

The site is located within Parramatta City Centre. As such section 4.3.3 of the DCP applies. Parramatta DCP 2011 provides guidance on the building alignment, setbacks, overall massing of buildings, vehicle access and car-parking treatments for the site as outlined below.

The following setbacks apply to the site:

### *To streets and watercourses:*

- 0m on Parkes Street
- 4.5m from the edge of easement at Clay Cliff Creek in rear of property.

### *Frontage heights:*

- 4 storeys/14m south of the city centre
- Above ground parking treatments:
- Active frontage at ground level with screened parking above ground level.

### *Side setbacks:*

- 0m up to street frontage height
- 3m for non-residential and 6m for residential for buildings less than or equal to 54m
- 6m for buildings over 54m

### *Rear Setbacks*

- Refer to setback from, Clay Cliff Creek for up to street frontage height
- 9m for buildings less than or equal to 54m
- 12m for buildings over 54m

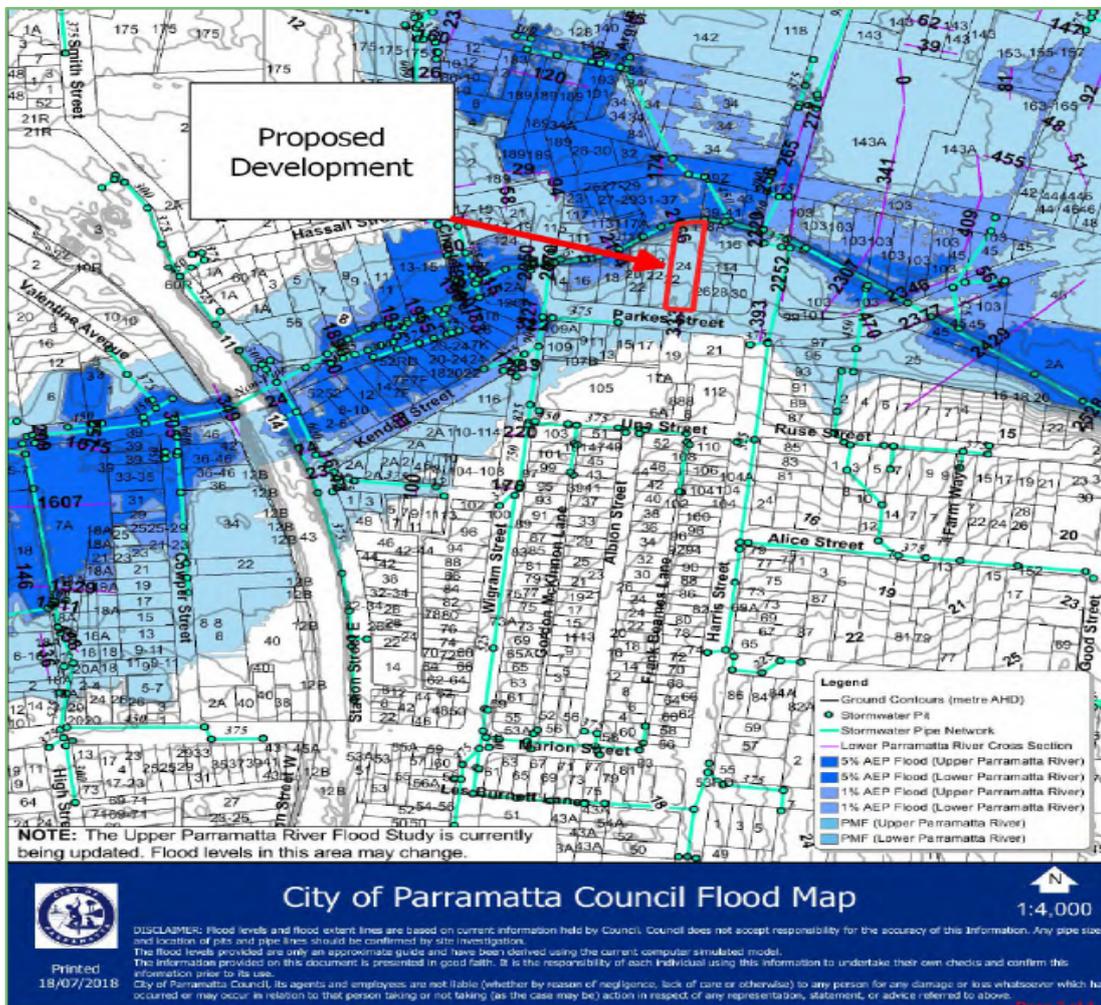
### *Vehicle Access:*

- No restrictions on additional vehicle entries.

## Flood Impact Assessment

This Flood Impact Assessment has been prepared by Cardno Pty Ltd with the report demonstrating the stormwater flooding extent and behaviour for the planning proposal for 24 Parkes Street, Harris Park.

The subject site is located on the Clay Cliff Creek floodplain upstream of Harris Street. It is proposed to redevelop the site as a multi-storey mixed-use apartment complex comprising four levels of basement car parking, four level of above ground parking, 4 levels of commercial retail outlets, 50 levels of residential apartments, one level of communal area and open space and two levels of sky gardens.



Source: Cardno Pty Ltd Flood Impact Assessment

The development is located almost wholly in a Low Flood Risk Precinct. Consequently, the development has been assessed against the planning and development controls that apply to “Residential” in a Low Flood Risk Precinct.

## PMF Event

To understand the likely warning times and associated response times during extreme flood events it is necessary to estimate the expected rate of rise of floodwaters.

At 24 Parkes Street, Harris Park the estimated rate of rise of flooding in a PMF event above the ground floor level and driveway crest level of 9.0 m AHD is around 1.0 m/hr and decreases as the peak water level is approached. Features of the planned development include:

- Ground levels which vary from 8.96 m AHD in the southwest corner to 6.84 m AHD in the northeast corner of the property;
- Proposed ground floor level for the commercial uses of 9.0 m AHD which provides 2.45 m freeboard to the indicative 100-year ARI flood level under climate change;
- Proposed Level 1 floor level for commercial uses of 14.5 m AHD which is higher than the PMF level;
- Proposed floor levels for two additional levels of commercial uses which are all significantly higher than the PMF level;
- Proposed floor levels for all the apartments which are all significantly higher than the PMF level;
- A driveway crest level of around 9.0 m AHD which provides 2.77 m freeboard to the 100-year ARI flood level in Clay Cliff Creek and 2.45 m freeboard to the indicative 100-year ARI flood level under climate change in Clay Cliff Creek.

While the entry to the ground floor commercial spaces has a freeboard of around 2.77m above the current 100-year ARI flood level, this freeboard would be overwhelmed in a PMF event (within around 3 hours). The PMF is estimated to reach a level of around 9.44 m AHD.

Section 2 of the Parramatta DCP 2011 describes site planning considerations including design objectives, design principles and design controls. An assessment of the compliance of the proposed development against Council's requirements is in Section 7 of the Flood Assessment.

It is concluded that the assessment and details in this Flood Impact Assessment satisfy the requirements of the Parramatta DCP 2011.

## **Assessment of Building Code of Australia**

Certified Building Specialists Pty Ltd have prepared an Assessment of Building Code of Australia (BCA) for 24 Parkes Street, Parramatta.

The Key BCA characteristics are provided below:

- Class 2 – Residential, Class 6 – Retail, Class 7a – Carparking
- Type of Construction – Type A
- Floor area and Volume – within limitations of BCA Table C2.2 for Type A construction.

The eastern and western elevations are noted to propose external glazed openings for visual aesthetics along the entire facade. These window openings are proposed to be fixed and fitted with drencher protection as they are located within 3m of the side allotment boundaries.

Furthermore, the proposed windows are noted to not be required to meet the minimum natural light and ventilation requirements in accordance with BCA Part F4 which are achieved by openings located on the northern and southern elevations. The protection of the fixed window openings on the eastern & western elevations can achieve compliance with the deemed to satisfy fire separation requirements of BCA Clauses C3.2 & C3.4.

## **Structural Report**

Cubic Consulting Pty Ltd are the structural design engineers for the project located at 24 Parkes Street, Parramatta, NSW. A preliminary Structural Design has been provided which has been prepared to outline the structural support system and the proposed construction methodology for the proposed development. The refined tower envelope is structurally competent.

## **Shoring System**

The shoring design for the proposed development requires a water tight system due to large amount of seepage in this area based on experience. One of the following systems will be used: 600mm diameter secant piles with 100 mm shotcrete; 600 mm diameter contiguous piles at 650 mm spacing with 150 mm shotcrete or 600 mm Reinforced Concrete Diaphragm wall.

However, should the results from the geotechnical investigation report during the CC stage return with no water table and seepage for the proposed site a solid pile system can be applied.

The shoring walls will be designed as anchored walls and designed to support the vertical loads from the structure. The piles for the proposed development will need to be socketed into Class III Sandstone or better material. The shoring system will be confirmed at CC stage once a geotechnical report has been completed.

### Footings System

The footing design for the proposed development will comprise of pad and strip footings constructed to support the columns and the walls. The footing design ensures the maximum imposed bearing pressure does not exceed the maximum allowable bearing pressure as recommended by the Geotechnical Engineer. The footing will be founded in class III Sandstone or better soil material.

### Structure System

The proposed development has been designed as a framed structure consisting of columns, walls, shear walls, lift cores and stair walls. The design is based on all the vertical elements lining up without transfer below the podium level, post tension transfer slab at Podium level. All the typical slabs in the basement car park levels and in the residential levels will be 200 to 220 mm thick Post Tension slabs.

The lift core walls will act as the main support for any horizontal loads i.e. Earthquake Loads or Wind Loads. A preliminary model has been performed to determine the stability of the building under different load cases in accordance with Australian Standard AS1170.

### Pedestrian Wind Environment Study

Windtech Consultants Pty Ltd have prepared a Pedestrian Wind Environment Statement for the subject site. The Assessment has reviewed the planning context, analysed wind effects, considered the proposed development and assessed its impacts.

The report identifies the existing conditions in the precinct relating to the critical outdoor trafficable areas associated with the proposed development, which are the focus of the assessment with regards to wind effects, and are detailed as follows:

- The Ground Level pedestrian footpath along the Parkes Street frontage of the site.
- The Level 4 Podium Communal Open Space.
- The Level 19 and 42 Sky Gardens.
- The various private balconies associated with the private residential tenancies of the subject development site.

It is expected the inclusion of the following treatment strategies to be effective in mitigating the adverse wind effects within the various outdoor trafficable areas of the site detailed in the table below:

Location	Strategies
<b>Ground Level:</b>	<ul style="list-style-type: none"> <li>- Inclusion of an impermeable awning over the pedestrian footpath along the Parkes Street frontage of the site.</li> <li>- Inclusion of densely foliating evergreen tree planting along the Parkes Street frontage of the site.</li> </ul>
<b>Level 4 Podium Communal Open Space:</b>	<ul style="list-style-type: none"> <li>-</li> <li>- Inclusion of Impermeable awning extending from the tower to the perimeter of the podium open space along the east, south and west aspects and 5m out from the northern aspect.</li> <li>- Inclusion of a 1.5m high impermeable balustrades along the perimeter of the podium Communal Open Space.</li> <li>- Inclusion of a porous screen on top of the balustrade up to the floor slab above for the east and western balustrades that lie between the southern end of the gym to the end of the recommended impermeable awning.</li> <li>- Retention of all planter boxes with densely foliating evergreen tree planting up to a height of 3–4m.</li> <li>- Inclusion of corner baffle screen arrangements at the corners extending from the gym room, lift core and stairwell.</li> <li>- Retention of impermeable canopies over the top of BBQ/seating areas at the north end of the communal open space.</li> <li>- Include planter boxes with densely foliating evergreen tree planting up to a height of 3–4m around the perimeter of the northern open area extending from the recommended porous screen onwards</li> </ul>
<b>Level 19 and 42 Sky Gardens:</b>	<ul style="list-style-type: none"> <li>- Retention of the full height porous screen around the perimeter of the sky garden trafficable area.</li> <li>- Inclusion of an impermeable awning over the eastern and western uncovered areas.</li> </ul>

**Private Balconies:**

- *Retention of proposed full-height privacy end screens along the corner edge of the various private corner balconies of the development.*
- *Retention of proposed impermeable balustrades along the remaining perimeter edge of the various private corner balconies of the development.*
- *Retention of proposed impermeable balustrades along the perimeter edges of the various private non-corner balconies of the development.*

With the inclusion of the abovementioned recommendations in the final design, it is expected that wind conditions for the various trafficable outdoor areas within and around the development to be acceptable for their intended uses.

Finally, the Pedestrian Wind Environment statement concludes that the planning proposal will not have any unacceptable implications.

**Traffic and Parking Assessment**

A Traffic Impact Assessment (TIA) been prepared by TRAFFIX Pty Ltd and is attached with this Planning Proposal.

The summarised version of the assessment is provided below with all rights reserved to the key points demonstrated belonging to TRAFFIX Pty Ltd. The Traffic Impact Statement is subject to copyright as permitted under the Copyright Act 1968. It is noted permission is granted regarding information from the study to incorporate it in this Planning Proposal.

The Traffic and Parking Assessment identifies that the cumulative impact upon the Level of Service for the two nearest intersections would reduce the level of service if no improvements are made to improve the operation of the intersections.

The Traffic Report identifies changes to the cycle times and phase sequence of both traffic signals, that when implemented, would result in an overall improvement to the operation of the nearby intersections, even with the increased traffic generation from the proposed developments. Accordingly, the proposed changes to the timing cycle and phase sequence are recommended to Council for implementation, to ensure that the planning proposals do not impact on the existing level of services but have a net benefit.

Intersection Description	Control Type	Period	Model	Degree of Saturation	Intersection Delay	Level of Service
Parkes Street / Harris Street	Signals	AM	Existing	1.004	55.4	D
		AM	With Development	1.093	88.5	F
		PM	Existing	1.056	71.6	F
		PM	With Development	1.105	97.1	F
Parkes Street / Wigram Street	Signal	AM	Existing	0.653	27.7	B
		AM	With Development	0.763	28.8	C
		PM	Existing	0.987	55.1	D
		PM	With Development	1.107	90.2	F

**Source:** TRAFFIX- Traffic Impact Assessment

It can be seen from the Table 10: Intersection Performance - Existing + Development that the intersections do not operate satisfactorily under the future scenario, with a level of service (LOS) F during both peak periods for the intersection of Harris Street and Parkes Street and for Pares Street and Wigram Street in the PM peak house. Therefore, improvements are proposed to improve the operation of the intersection with the proposed traffic generation.

Intersection Description	Control Type	Period	Degree of Saturation	Intersection delay	Level of Service
Parkes Street / Harris Street	Signals	AM	1.004	58.4	E
		PM	1.143	58.9	E
Parkes Street / Wigram Street	Signal	AM	0.754	28.2	B
		PM	0.893	34.6	C

**Source:** TRAFFIX- Traffic Impact Assessment

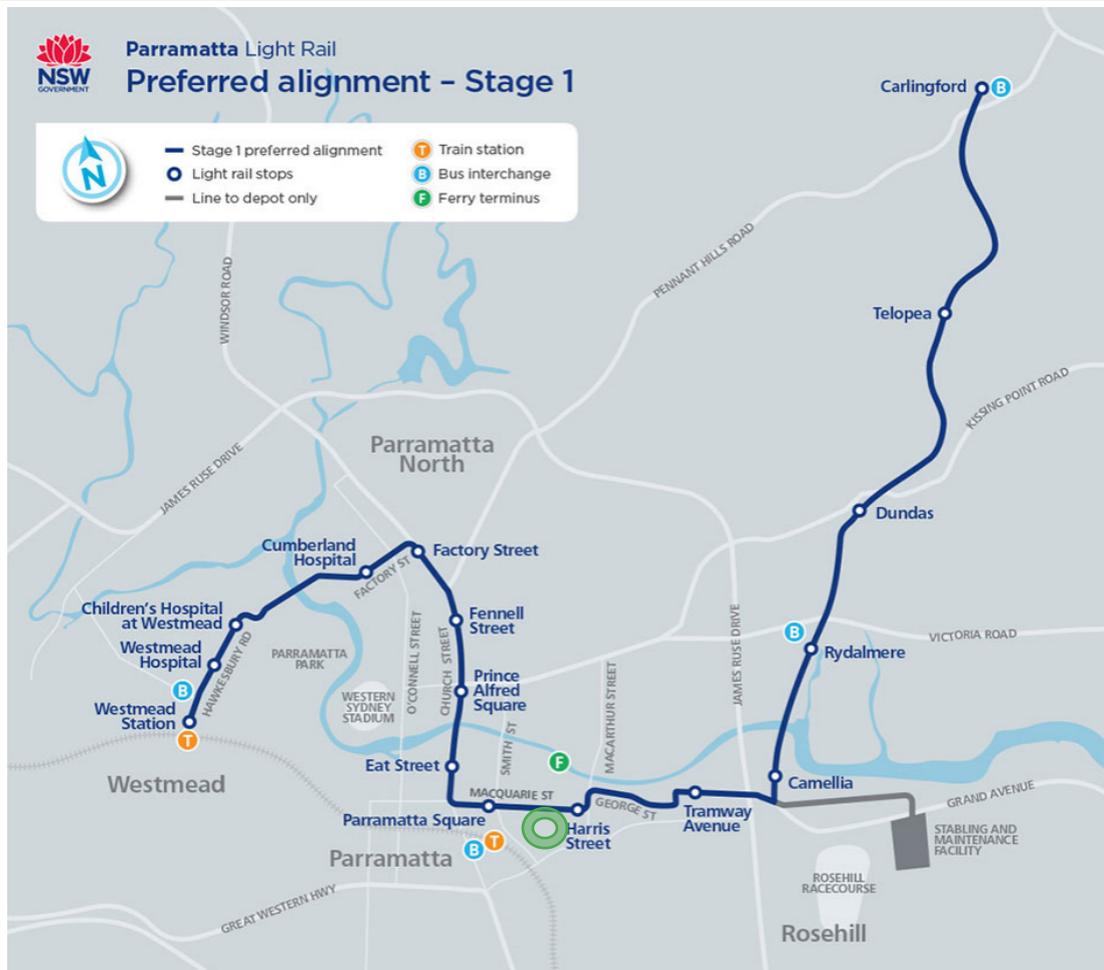
It can be seen from Table 11 Intersection performance- Existing + Development with improvements that the intersections operate significantly better under the future improvements scenario, with LOS E during both peak periods for the intersection of Harris Street and Parkes Street. The intersection of Parkes Street and Wigram Street now operates satisfactorily with a LOS C or better during both peak periods. Therefore, the improvements are recommended to be adopted to improve existing traffic flow, particularly during the PM peak and allow for the increased traffic generation with the proposed developments.

Accordingly, the traffic impacts associate with the development can be accommodated on the road network with the proposed changes to the timing cycle and phase sequence. Furthermore, the maximum parking requirements for the proposed developments have been provided in accordance with the City of Sydney Local Environmental Plan 2012 as required by Parramatta City Council for development within the Parramatta City Centre.

Moreover, the vehicular access requirements for each development have been provided to ensure the proposed developments comply with AS2890.1 (2014). It is therefore concluded that the proposed development is supportable on traffic planning grounds and would operate satisfactorily.

The development proposal is within proximity to stage 1 of Parramatta Light Railway as demonstrated via Figure 13 below.

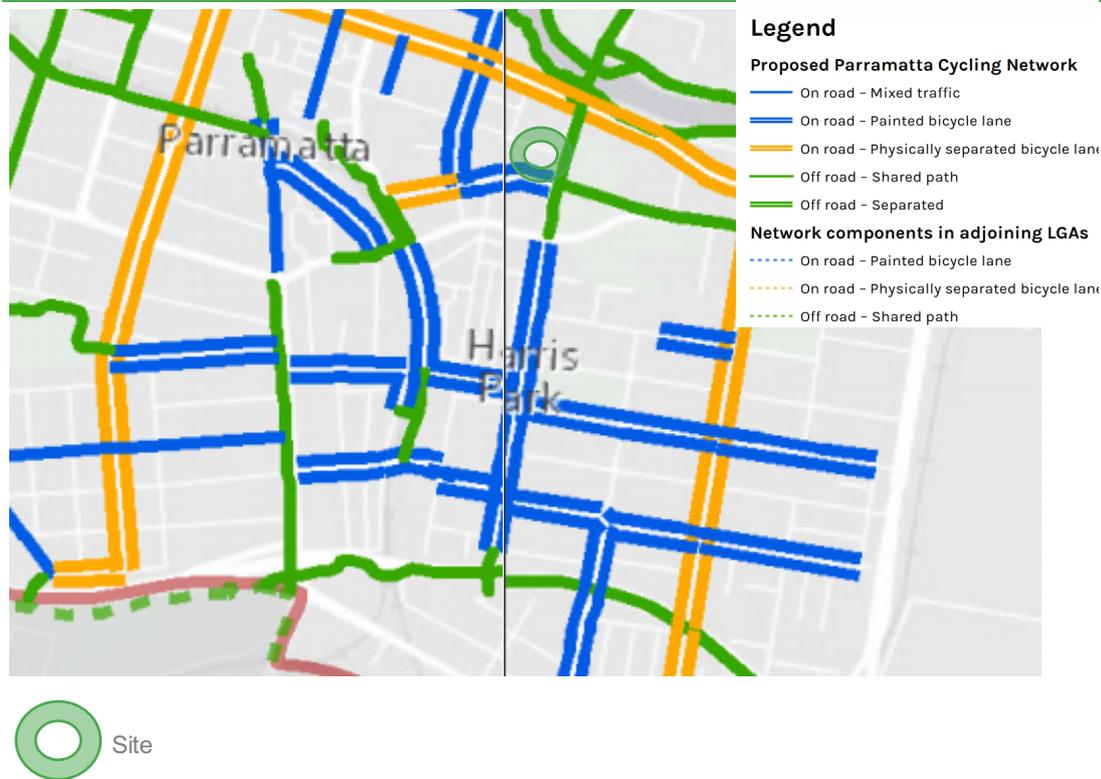
Figure 13: Parramatta Light Rail Stage 1



The site is within proximity to the Stage 1 of the Parramatta Light Rail with a proposed light rail stop to be located at the Corner of Harris and Macquarie Streets which is 250m from the site. The Parramatta Light Rail is due to be opened in 2023 and will link the site to Parramatta’s CBD, Westmead Health Precinct, Parramatta North Urban Transformation Precinct, the new Western Sydney Stadium, a cultural hub including the Powerhouse Museum and Riverside Theatres, the private and social housing redevelopment of Telopea, Rosehill Gardens Racecourse, and three Western Sydney University campuses.

The Parramatta Light Rail is planned to be serviced from 5am to 1am, 7 days a week with services approximately every 7.5 minutes from 7am to 7pm weekdays. The light rail is also being coupled with a new shared pedestrian and cycle path which is shown in Figure 14 in the following page.

Figure 14: City of Parramatta Council's Draft Bike Plan



The subject land achieves optimal access to pedestrian pathways, cycleways as well as light rail.

Both the Parramatta Light Rail and new bus and cycleways will deliver truly city shaping infrastructure which will powerfully change the way people live within Parramatta and commute to Parramatta. This will result in a significant lower reliance on private vehicle trips.

In addition, the draft Bike Plan supports the City of Parramatta's Vision to be Sydney's Central City, sustainable, liveable, and productive city. The plan seeks to bring forward the planned and coordinated delivery of cycleway infrastructure to promote multi-modal transport options throughout the City.

### Experiment Farm and Shadow Impacts

The existing planning controls relating to Experiment Farm, contained within the Parramatta LEP and the Parramatta DCP, relate only to the protection of view corridors. No controls in relation to overshadowing, typically found in Clause 7.4 of the LEP, apply to Experiment Farm.

Experiment Farm Cottage and Environs (I00768) is designated an item of State significance under Part 1 to Schedule 5 of LEP 2011; and an archaeological site

(A00768) of State significance under Part 3 to Schedule 5 of LEP 2011. In addition, the area is also within the Experiment Farm Heritage Conservation Area under Part 2 to Schedule 5 of LEP 2011. Experiment Farm Cottage is also specifically listed on the State Heritage Register (SHR 00768) under the NSW Heritage Act.

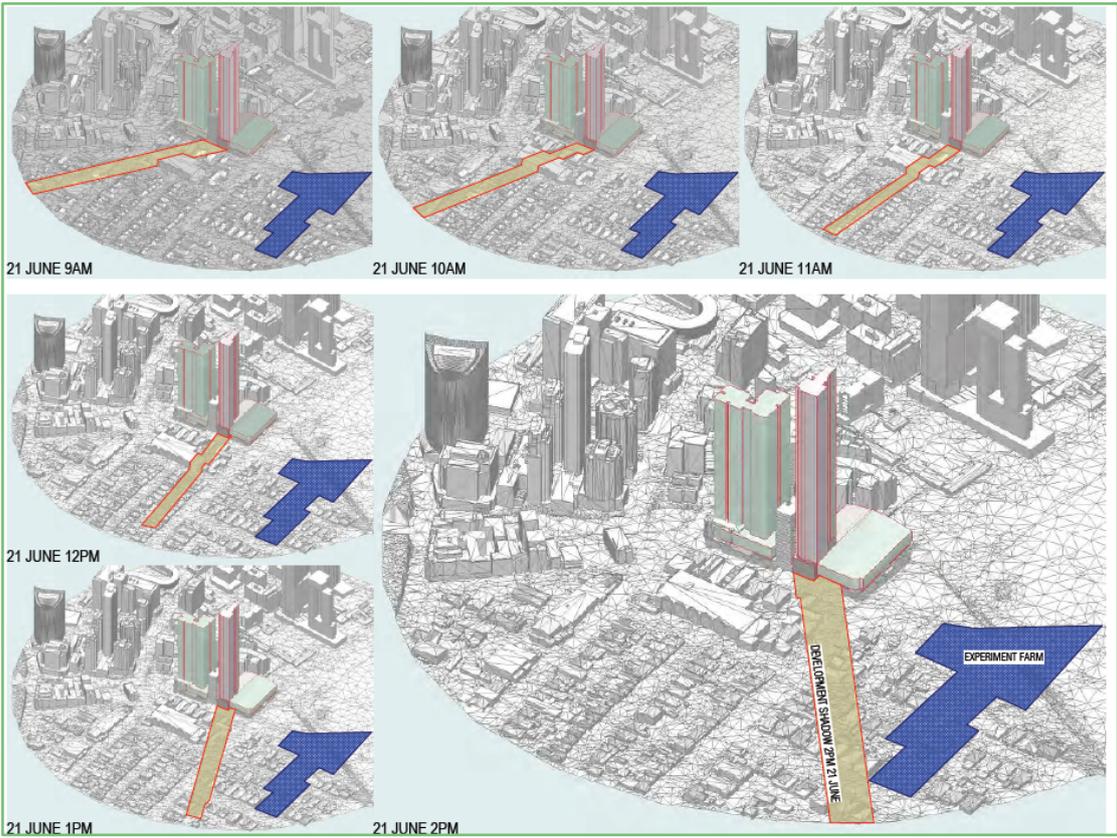
Notwithstanding the absence of existing planning controls in relation to shadowing of Experiment Farm, Council has indicated an intention to introduce a Sun Access Protection surface to Experiment Farm. The Council has commissioned two studies to deal with different aspects of heritage for the City Centre (Urbis 2015 and Hector Abrahams Architects 2017). The Urbis and Hector Abraham Studies both included a series of recommendations and findings for planning controls to be incorporated into the CBD Planning Proposal. This control is neither certain or imminent given that the CBD Planning Proposal has not been issued by the Department of Planning, and once issued, will be the subject of public consultation and potential amendment or even deletion.

It is noted that not all of the recommendations or findings of the two heritage studies were supported by the staff or endorsed by the Council. The recommendations and findings that have been adopted are likely to also be subject to challenge and debate during the future public exhibition phase of the CBD Planning Proposal. Therefore, absolute reliance upon, or enforcement of, the recommendations and findings of these studies is not considered appropriate.

Notwithstanding the lack of existing controls and the uncertainty in relation to future planning controls for solar access to Experiment Farm, in preparing the Planning Proposal, the proponent and consultant team have been cognisant of the Councils intention to introduce a Sun Access Protection surface to Experiment Farm, particularly between the hours of 10am and 2pm for mid-winter.

Throughout the design development for this amended Planning Proposal submission for 24 Parkes Street, careful analysis of the shadowing impact to Experiment Farm has been undertaken.

As is illustrated in the extract below, the proposal for 24 Parkes will have no overshadow impact to Experiment Farm Reserve and Cottage between the 10am and 2pm mid-winter. This is irrespective of the height of the tower.



Source: Zhinar Architects: Shadow Diagram

## THE PLANNING PROPOSAL

### PART 1 – OBJECTIVES OR INTENDED OUTCOMES

The objective of the planning proposal is:

To provide suitable zoning, building height and floor space ratio which facilitate urban renewal of the subject site along with the provision of high-density development commensurate with State Government planning strategies. The planning proposal seeks to locate additional residents within Parramatta CBD.

### PART 2 – EXPLANATION OF PROVISIONS

The stated objective will be achieved by:

- Amending the Height of Building Map for Parramatta LEP 2011 in accordance with the proposed height map, shown as an attachment, which indicates no maximum building height on the site.
- Amending the Floor Space Ratio Map for Parramatta LEP 2011 in accordance with the proposed floor space ratio map, shown as an attachment, which indicates a maximum permissible floor space ratio of 10:1 on the site.

### PART 3 – JUSTIFICATION

#### Section A – Need for the planning proposal

*Q1. Is the planning proposal the result of any strategic study or report?*

The planning proposal has been initiated following the key directions and strategies described in the Plan for Growing Sydney, A Metropolis of Three Cities – Greater Sydney Region Plan, the Central City District Plan, the Greater Parramatta and Olympic Peninsular Plan, the CBD Planning Proposal and the Parramatta CBD Strategy.

The proposed amendments to building height and floor space ratio limitations are informed by a detailed urban design and planning study prepared by Urbis Pty Ltd. The study is included as an attachment to this Planning Proposal. The study presents an urban design analysis of the site and its context as well as potential design options for future redevelopment.

The proposal is consistent with the key directions and strategies described in *A Plan for Growing Sydney*. Discussion on the consistency of the planning proposal with this strategy is contained in the response to *Question 3*.

*Q2. Is the planning proposal the best means of achieving the objectives or intended outcomes, or is there a better way?*

It is considered that the planning proposal is the best means of achieving the stated objective of urban revitalisation of this land. The planning proposal is certainly the most efficient mechanism available for stimulating urban renewal and accelerating delivery of high-density housing in a manner consistent with the strategic directions established in the documents the Plan for Growing Sydney, A Metropolis of Three Cities – Greater Sydney Region Plan, the Central City District Plan, the Greater Parramatta and Olympic Peninsular Plan, the CBD Planning Proposal and the Parramatta CBD Strategy.

The Planning Proposal assists in amending the planning controls ahead of the Parramatta CBD Planning Strategy's expected timeframe. The planning proposal is certainly the most efficient mechanism available for stimulating urban renewal and accelerating delivery of high-density housing.

### **Section B – Relationship to strategic planning framework**

*Q3. Is the planning proposal consistent with the objectives and actions of the applicable regional or sub-regional strategy (including the Sydney Metropolitan Strategy and exhibited draft strategies)?*

The stated objective of the planning proposal closely aligns with several State Government strategies, specifically the Plan for Growing Sydney, A Metropolis of Three Cities – Greater Sydney Region Plan, the Central City District Plan, the Greater Parramatta and Olympic Peninsular Plan, the CBD Planning Proposal and the Parramatta CBD Strategy.

#### **The Plan for Growing Sydney (Department of Planning and Environment, December 2014)**

The Plan for Growing Sydney outlines the State Government's plan to deliver homes, jobs and infrastructure to support a growing population. Key directions described in the Plan relate to accelerating housing supply and urban renewal across Sydney, with a focus on providing homes in areas well serviced by existing or planned infrastructure.

The Plan identifies that there is a significant gap between current housing production and future housing needs and that it is critical to remove the barriers to increased housing production to facilitate accelerated housing supply. The Plan explains that the Government intends to work with councils and the development sector to put in place flexible planning controls which enable housing development in feasible locations.

The Plan states that the Government intends to focus on the urban renewal in existing centres, within which the subject site is situated. As noted in the Plan, the Parramatta

has superior access to employment, a rail network and a range of social infrastructure. Furthermore, the construction of WestConnex will improve local amenity by reducing through-traffic on surface roads and allowing for enhanced local connectivity. The planning proposal seeks to relax building height and floor space ratio controls to allow the delivery of high-density housing in an area that can accommodate increased population. Parramatta is serviced by public transport services that are frequent and is located close to the central core of the Parramatta CBD. The planning proposal is consistent with the objectives and actions of The Plan for Growing Sydney.

### **Central City District Plan (Greater Sydney Commission March 2018)**

The Central City District Plan sets out the priorities and actions for this District and these are structured around 3 key themes of a Productive City, a Liveable City and a Sustainable City. As relevant to the subject site the importance of Parramatta's CBD and growing this CBD in terms of both jobs and housing are continually emphasised in the District Plan. Particularly with reference to the 30-minute city. The planning proposal seeks to deliver both additional housing but also jobs within a 30-minute city scenario.

Expediting the delivery of housing brings more dwellings to the market which in turn drives prices down. Delivering more dwellings and within shorter timeframes aims to respond to the current housing crisis in Western Sydney where scarcity has resulted in an affordable housing shortage. The planning proposal seeks to deliver housing to the market quickly and in a highly liveable location which is well within the 30-minute city scenario and in fact within walking/cycling distance of the Parramatta CBD.

In summary, this planning proposal seeks to deliver on the vision set forward in the Central City District Plan by:

1. Increasing diversity of housing choice.
2. Delivering housing to meet both the need for an additional 207,500 homes in the period between 2016 to 2036. This is an ambitious target that can only be met with significant increases to permitted building heights and FSRs.
3. Expediting the delivery of new housing stock to ease the pressure of demand resulting in a generally more affordable housing product.
4. Contribution to energy efficiency through aims to deliver a development that meets environmental performance criteria.
5. Reduced emissions through both building environmental performance but also through reduction in reliance on private vehicle travel. Focusing increased housing on the subject site which is highly accessible to local bus and train services means that future residents are more likely to walk, cycle and use integrated public transport systems.
6. Enhancing the role of Greater Parramatta as the economic anchor within the Greater Parramatta Olympic Peninsula vision by delivering both jobs and housing.

7. The objectives of the planning proposal are considered to align closely with the documented priorities for the Central City District.

### **Greater Parramatta and the Olympic Peninsula Plan (Greater Sydney Commission October 2016)**

The GPOP has been identified as a new priority growth area in the Plan for Growing Sydney 2014. The GPOP sets forward a vision to build upon 4 quarters identified within the area. Each quarter of the GPOP is linked by the Parramatta River and the planned Parramatta Light Rail.

The Parramatta CBD and Westmead Health and Education Super Precinct are key focus precincts within the GPOP where urban renewal is to be concentrated. Again, within this Plan the 30-minute city approach is adopted ensuring that access to all modes of transport connections are optimised. The GPOP advocates a break in the traditional west to east movement to make Parramatta CBD the central city within Greater Sydney.

The planning proposal is aligned with the GPOP in that it seeks to deliver a mix of housing, enabling residents of all kinds to settle and move as their needs change from student to entrepreneur, medico or executive. The planning proposal is also closely aligned with the desire to deliver new dwellings within the so called 30-minute city (with the proposed new dwellings within the central core of the Parramatta CBD).

### **Parramatta CBD Planning Strategy**

Council on 27 April 2015 adopted the Parramatta CBD Planning Strategy. The objective of the Strategy was to establish a vision for growth, principles and actions to guide a new planning framework and an implementation plan for delivery. The strategy led to the preparation of a CBD Planning Proposal which was adopted by Council in April 2016.

The CBD Planning Proposal establishes a vision for growth that expands and intensifies the commercial core, along with an expanded and higher density mixed use and residential focus.

Key elements of the Planning Proposal relevant for the subject site include –

- Base and incentive FSR and Height controls.
- A sliding scale for FSR based on the underlying size of land.

Under the current PLEP 2011, most sites in the Parramatta CBD have one height control and one FSR control. This Planning Proposal retains in the main these heights and FSR as shown on the existing Height of Buildings Map and FSR Map and proposes to introduce a second height and FSR control.

Consequently, most sites within the Parramatta CBD Planning Proposal boundary will have two FSR and two height controls and these are to be known as ‘base FSR and height’, and ‘incentive FSR and height’. The proposed incentive FSR control is generally 10:1 for land within the CBD Core and 6:1 for land north and south of the CBD Core. It is noted the land parcel falls under the 10:1 incentive.

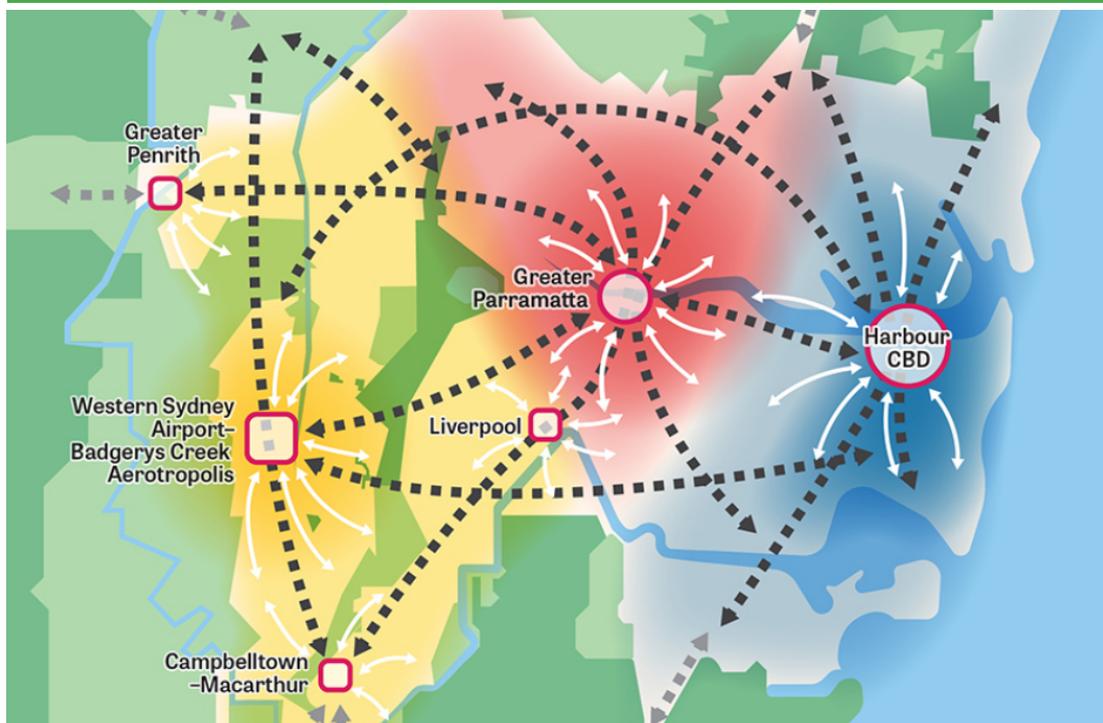
Accordingly, this Planning Proposal is consistent with the adopted Planning Proposal as it proposes increased height, complimentary FSR, and housing on land within the city centre. Consideration has been given to the most appropriate built form option for the site, along with the manner in which environmental impacts are managed.

**A Metropolis of Three Cities – Greater Sydney Region Plan (Greater Sydney Commission March 2018)**

The Metropolis of Three Cities – Greater Sydney Region Plan provides a framework for the predicted growth in Greater Sydney.

Key themes based on delivering a metropolis of three 30-minute cities which are a follow on from the ten directions envisioned by the Greater Sydney Commission. This vision is set out in the structure plan shown in Figure 16 below.

**Figure 16: Extract from A Metropolis of Three Cities - Greater Sydney Region Plan March 2018**



The four key themes are focused on infrastructure and collaboration, liveability, productivity and sustainability. The planning proposal is aligned with these key themes, directions, metrics and objectives by:

1. Infrastructure and collaboration. The subject land is located within an identified priority growth area. The proposed Parramatta Light Rail will put Parramatta CBD in a highly accessible location with stage 1 proposing a total of 16 stops and Stage 2 proposing 10-12 additional stops. during peak travel times. The site is located within the Parramatta CBD which is well within the 30-minute city scenario.
2. Liveability. The reference architectural design drawings provided with this planning proposal and the urban design study show that liveability for the future residents is a primary consideration for the future building design. Solar access and cross ventilation has been maximised along with general compliance with the requirements of the Apartment Design Guide.
3. Productivity. The proposal capitalises on the Parramatta Light Rail which is transformational infrastructure maximising economic opportunities for the Central City. The proposal creates a more accessible and walkable city with pedestrian links and bike paths as well as promoting additional local jobs through the implementation of a B4 Mixed Use zone.
4. Sustainability. The planning proposal facilitates building capacity based on existing and committed infrastructure. This seeks to shape strong, connected community making the revitalised precinct at Parramatta CBD more resilient.

Q4. Is the planning proposal consistent with a council's local strategy or other local strategic plan?

#### **Parramatta 2038 – Community Strategic Plan (June 2013)**

*Parramatta 2038* is the Community Strategic Plan for the City of Parramatta. *Parramatta 2038* is described as a long-term vision for the Parramatta Local Government Area and links to the long-term future of Sydney. The planning proposal will contribute toward achieving the goals identified in the plan.

Parramatta 2038 identifies six strategic objectives to deliver the vision for Parramatta and the intended outcome of the planning proposal is consistent with these objectives. Specifically, the redevelopment of the subject site will contribute to the economic growth of Parramatta, will encourage diversity and liveability of places and will enhance the status of Parramatta as a City in which people want to reside.

*Q5. Is the planning proposal consistent with applicable State Environmental Planning Policies?*

The following table provides a brief assessment of consistency against each State Environmental Planning Policy (SEPP) relevant to the planning proposal.

<b>Table 2: Consideration of SEPPs</b>		
<b>Consideration of SEPPs</b>	<b>Relevance</b>	<b>Comment</b>
SEPP No. 1 - Development Standards	-	This SEPP does not apply to land subject to Parramatta Local Environmental Plan 2011.
SEPP 14 – Coast Wetlands	-	This SEPP does not apply to land subject to Parramatta Local Environmental Plan 2011.
SEPP 19 – Bushland in Urban Areas	-	The site does not contain any significant vegetation.
SEPP 21 – Caravan Parks	-	Not relevant to the proposal.
SEPP 26 – Littoral Rainforests	-	Not relevant to the proposal.
SEPP 30 – Intensive Agriculture	-	Not relevant to the proposal.
SEPP 33 – Hazardous or Offensive Development	-	Not relevant to the proposal.
SEPP 36 – Manufactured Home Estates	-	Not relevant to the proposal.
SEPP 44 – Koala Habitat Protection	-	The site does not contain koala habitat.
SEPP 47 – Moore Park Showground	-	Does not apply to land within Parramatta CBD.
SEPP 50 – Canal Estate Development	-	Not relevant to the proposal.
SEPP 52 – Farm Dams	-	Not relevant to the proposal.
SEPP No. 55 - Remediation of Land	✓	<p>The existing uses of the site include residential development which are unlikely to result in contamination of the land.</p> <p>The planning proposal is consistent with the aims and provisions of this SEPP.</p> <p>In any case, future redevelopment of the site will need to address the requirements of the SEPP. The proposal is consistent with the provision of this SEPP.</p>
SEPP 62 – Sustainable Aquaculture	-	Not relevant to the proposal.

SEPP No. 64 - Advertising and Signage	-	The planning proposal is consistent with the aims or provisions of this SEPP. Where future development incorporates signage, the provisions of this SEPP will need to be considered.
SEPP No. 65 - Design Quality of Residential Apartment Development	✓	The planning proposal seeks to facilitate high-density housing in the form of a residential flat building. An urban design study submitted with this planning proposal considers potential design options which address the provisions of SEPP 65.
SEPP 70 – Affordable Housing Schemes	-	This SEPP does not apply to this land.
SEPP 71 – Coastal Protection	-	This SEPP does not apply to this land.
SEPP (Building Sustainability Index: BASIX) 2004	✓	The planning proposal is consistent with the aims or provisions of this SEPP. Future development incorporating a BASIX affected buildings will be subject to the provisions of this SEPP.
SEPP (Affordable Rental Housing) 2009	-	The planning proposal is consistent with the aims or provisions of this SEPP. Future development may incorporate housing delivered under this SEPP and relevant provisions will be given detailed consideration during the assessment of a development application.
SEPP (Building Sustainability Index: BASIX) 2004	✓	The planning proposal is consistent with the aims or provisions of this SEPP. Future development incorporating a BASIX affected buildings will be subject to the provisions of this SEPP.
SEPP (Educational Establishments and Child Care Facilities) 2017	✓	The Planning Proposal is consistent with the aims or provisions of this SEPP. Future development incorporating a child care centre, or the like will be subject to the provisions of this SEPP.
SEPP (Exempt and Complying Development Codes) 2008	-	The planning proposal is consistent with the aims or provisions of this SEPP. This SEPP is not relevant in the context of the planning proposal.
SEPP (Infrastructure) 2007	✓	Future development may constitute traffic generating development and trigger an assessment under this SEPP.
SEPP (Housing for Seniors or People with a Disability) 2004	-	It is not proposed to carry out development under the provisions of this instrument.
SEPP (Integration and Reveals) 2016	-	Not relevant to this planning proposal.
SEPP (Kosciusko National Park) 2007	-	This SEPP does not apply to this land.
SEPP (Kurnell Peninsular) 1989	-	This SEPP does not apply to this land.

SEPP (Mining and Extractive Industries) 2007	-	Not relevant to this planning proposal.
SEPP (Miscellaneous Consent Provisions) 2007	-	Not relevant to this planning proposal.
SEPP (Penrith Lakes Scheme) 1989	-	Not relevant to this planning proposal.
SEPP (Rural Lands) 2008	-	Not relevant to this planning proposal.
SEPP (State and Regional Development) 2011	✓	It is likely that future development of the site will constitute Regional Development and be determined by the Sydney West Planning Panel.
SEPP (State Significant Precincts) 2005	-	This SEPP does not apply to this land.
SEPP (Sydney Drinking Water Catchment) 2011	-	This SEPP does not apply to this land.
SEPP (Sydney Region Growth Centres) 2006	-	This SEPP does not apply to this land.
SEPP (Three Ports) 2013	-	This SEPP does not apply to this land.
SEPP (Urban Renewal) 2010	-	This SEPP does not apply to this land.
SEPP (Western Sydney Employment Area) 2009	-	This SEPP does not apply to this land.
SEPP (Western Sydney Parklands) 2009	-	This SEPP does not apply to this land.

The following table provides a brief assessment of consistency against each Deemed SEPP relevant to the planning proposal.

Table 3: Consideration of Deemed SEPPs		
Consideration of Deemed SEPPs	Relevance	Comment
REP (Sydney Harbour Catchment) 2005	✓	The planning proposal is not inconsistent with the aims or provisions of this deemed SEPP. Future development will be subject to the provisions of this deemed SEPP.

Q6. Is the planning proposal consistent with applicable Ministerial Directions (s.9.1 directions)?

The following table provides a brief assessment of consistency against each s.9.1 direction relevant to the Planning Proposal.

Table 4: Consideration of Section 9.1 Directions		
Consideration of s. 9.1 Directions	Relevance	Comment
1. Employment and Resources		
1.1 Business and Industrial Zones	-	The planning proposal does not seek to amend the existing zoning. The proposal is consistent with this Direction.
1.2 Rural Zones	-	The planning proposal does not relate to rural zoned land.
1.3 Mining, Petroleum Production and Extractive Industries	-	The planning proposal does not relate to land that is likely to be useful for extractive industries.
1.4 Oyster Aquaculture	-	The proposal will not impact on any priority oyster aquaculture areas.
1.5 Rural Lands	-	The planning proposal does not relate to rural land.
2. Environment and Heritage		
2.1 Environment Protection Zones	-	The site is not currently zoned for environmental protection purposes.
2.2 Coastal Protection	-	The land is not within a coastal zone.
2.3 Heritage Conservation	✓	The proposal does not seek any changes to the existing heritage conservation provisions of the LEP and DCP.
2.4 Recreation Vehicle Areas	-	The planning proposal does not relate to recreation vehicles or land with a high conservation value.
2.5 Application of E2 and E3 Zones and Environmental Overlays in Far North Coast LEPs	-	This direction does not apply in the Parramatta Local Government Area.
This direction applies to the local government areas of Ballina, Byron, Kyogle, Lismore and Tweed.		
3. Housing, Infrastructure and Urban Development		
3.1 Residential Zones	✓	The planning proposal is consistent with the direction. The planning proposal seeks to facilitate

		<p>the development of high-density housing through the application of appropriate floor space ratio and building height controls.</p> <p>The planning proposal represents a more efficient use of existing infrastructure and services and reduces the consumption of land for housing through urban renewal.</p>
3.2 Caravan Parks and Manufactured Home Estates	-	The planning proposal does not seek amend the current prohibition of caravan parks on this site.
3.3 Home Occupations	-	No changes to the existing provisions.
3.4 Integrating Land Use and Transport	✓	The planning proposal is consistent with the direction. The subject site is within proximity of Parramatta train station and future light rail stop. The site is well serviced by transport infrastructure and has optimal access to employment opportunities within the core of the Parramatta CBD, Westmead and related employment precincts.
3.5 Development Near Licensed Aerodromes	-	The land is not within the vicinity of an aerodrome.
<b>4. Hazard and Risk</b>		
4.1 Acid Sulfate Soils	✓	The Acid Sulfate Soils Map for Parramatta LEP 2011 indicates that there is a probability that the subject site contains acid sulfate soils. An acid sulfate soils study is not necessary at planning proposal stage. Future development of the site will require detailed consideration of this issue as per clause 6.1 of the Parramatta LEP 2011.
4.2 Mine Subsidence and Unstable Land	-	The site is not within a mine subsidence district.
4.3 Flood Prone Land	-	<p>The planning proposal does not seek to change the existing Council controls relating to flooding. Flood impact is to be further considered in detail at development application stage.</p> <p>Further details from flooding report.</p>
4.4 Planning for Bushfire Protection	-	The site is not affected by bushfire planning provisions.
<b>5. Regional Planning</b>		
5.1 Implementation of Regional Strategies	-	The site is not located within an area affected by a regional strategy.
5.2 Sydney Drinking Water Catchments	-	This direction does not apply to land within Parramatta local government area.
5.3 Farmland of State and Regional	-	This direction does not apply to land within Parramatta local government area.

Significance on the NSW Far North Coast		
5.4 Commercial and Retail Development along the Pacific Highway, North Coast	-	This direction does not apply to land within Parramatta local government area.
5.8 Second Sydney Airport: Badgerys Creek	-	The site is not near the Second Sydney Airport: Badgerys Creek.
5.9 North West Rail Link Corridor Strategy	-	This direction only applies to land within Hornsby, the Hills and Blacktown.
5.10 Implementation of Regional Plans This direction applies when a relevant planning authority prepares a planning proposal.	-	Not applicable to the current planning proposal.
6. Local Plan Making		
6.1 Approval and Referral Requirements	✓	The planning proposal is considered to be consistent with the direction. The planning proposal does not trigger the need for any additional concurrence, consultation or referral to a Minister or Public Authority.
6.2 Reserving Land for Public Purposes	-	The planning proposal does not seek to change the current zoning provisions and therefore does not impact on land reserved for public purposes.
6.3 Site Specific Provisions	-	The proposal is relating to zoning, building height, and FSR thus the proposal is consistent with this direction.
7. Metropolitan Planning		
7.1 Implementation of A Plan for Growing Sydney	✓	<p>This proposal is consistent with the objectives and strategies of A Plan for Growing Sydney as outlined in the Planning Proposal report.</p> <p>The Planning Proposal is consistent with the NSW Government's A Plan for Growing Sydney. Refer to Part 3 – Justification of this report, Section B – Relationship to Strategic Planning Framework of the Planning Proposal for an explanation of the consistency of the Planning Proposal with A Plan for Growing Sydney.</p> <p>The Planning Proposal achieves the overall intent of the Plan and seeks to implement the achievement of its vision, land use strategy, policies, outcomes or actions.</p> <p>This planning proposal seeks to facilitate development of this key parcel of land within the Quarter which will encourage economic investment in this strategic centre, employment</p>

		generation and delivery of new housing opportunities.
7.2 Implementation of Greater Macarthur Land Release Investigation	-	This direction does not apply to land within the City of Parramatta Council.
7.3 Parramatta Road Corridor Urban Transformation Strategy	-	The site is not located on land subject to the Parramatta Road Corridor Urban Transformation Strategy.
7.4 Implementation of North West Priority Growth Area Land Use and Infrastructure Implementation Plan	-	The site is not located within the North West Priority Growth Area.
7.5 Implementation of Greater Parramatta Priority Growth Area Interim Land Use and Infrastructure	✓	<p>The planning proposal is consistent with the Greater Parramatta Priority Growth Area Interim Land Use and Infrastructure Implementation Plan. The land is identified as a potential precinct targeted for growth, particularly within 1km of the new light rail stops. The land is within Parramatta CBD which is within proximity the planned Parramatta Light Rail with swift connections access to Westmead, Silverwater and Olympic Park.</p> <p>The planning proposal is entirely consistent with this Direction.</p>
7.6 Implementation of Wilton Priority Growth Area Interim Land Use and Infrastructure Implementation Plan	-	The site is not located in the Wilton Priority Growth Area.
7.7 Implementation of Glenfield to Macarthur Urban Renewal Corridor	-	This direction does not apply to land within the Parramatta Local Government Area.
This direction applies to Campbelltown City Council.		

### Section C – Environmental, social and economic impact

Q7. Is there any likelihood that critical habitat or threatened species, populations or ecological communities, or their habitats, will be adversely affected as a result of the proposal?

The subject site does not contain habitat of any description. There is no likelihood that critical habitat or threatened species, populations or ecological communities, or their

habitats, will be adversely affected as a result of the planning proposal. No further assessment is considered necessary.

Q8. Are there any other likely environmental effects as a result of the planning proposal and how are they proposed to be managed?

The planning proposal seeks to revise the maximum permitted building height and floor space ratio controls contained within Parramatta LEP 2011 in order to facilitate the redevelopment of the subject site for the purpose of high-density residential development. The anticipated environmental effects associated with the higher-density development that will be permitted by the amendment are discussed below.

Discussion dealing with the likely environmental effects has been provided earlier in this document in relation to –

- Traffic
- Flooding
- Overshadowing of Experiment Farm
- Built form and tower relationships

The analysis confirms that the proposed FSR on 24 Parkes Street of 12.5:1 (inclusive of the additional 15% design excellence bonus) will not result in significant environmental impacts that would warrant the alteration to the proposal as submitted.

Q9. Has the planning proposal adequately addressed any social and economic effects?

The social and economic effects of the planning proposal are most appropriately described in the context of the challenges associated with a growing population as described in the State Government document the Plan for Growing Sydney. Among other things, the Plan explains that to meet the needs of a larger population and to maintain economic growth, urban renewal in combination with infrastructure delivery must occur in strategic urban centres.

As previously described, the objective of the planning proposal aligns closely with the strategic direction identified in the Plan for Growing Sydney. The delivery of high-density housing in a location that is well serviced by infrastructure and where there are minimal existing environmental site constraints is considered to represent a positive social outcome. The planning proposal will facilitate future development that will result in higher population densities in Parramatta. In this regard, the planning proposal will support the emergence of Parramatta as Sydney's second CBD which will in turn contribute to continued economic growth.

A key component of the preferred future development option for the subject site incorporates an area of public open space. The public open space will have excellent connectivity to public transport and will serve to promote healthy lifestyles and social interaction.

#### Section D – State and Commonwealth interests

Q10. Is there adequate public infrastructure for the planning proposal?

The Parramatta CBD Strategy identifies this site as suitable for high density residential development due to its superior access to transport and employment opportunities in the Parramatta CBD. The site is located not only within the Parramatta CBD but also is within 650m walking distance to Parramatta train station and a 750m walking distance to Harris Park Train Station.

Given the proximity of the subject site to public transport services including bus services it is anticipated that a significant proportion of new residents would opt to use public transport rather than private vehicle.

The subject site is within the Parramatta CBD which has a variety of health, education and emergency services. In a broader context, the subject site is proximate to Westmead Hospital and the Western Sydney University which are regional institutions.

The Council has endorsed a value sharing mechanism as part of the Parramatta CBD Planning Proposal which is actualised through the floor space ratio controls proposed within the Parramatta CBD Planning Proposal. This planning proposal is supported by a letter which proposes to make a voluntary financial contribution consistent with the Phase 1 Value Sharing methodology that will provide contributions towards community infrastructure.

As discussed previously, there are incentives in terms of both building height and floor space ratio that can be utilised for this site which are linked to the provision of community infrastructure. The provisions require delivery of community infrastructure to the satisfaction of the consent authority, whether provided on the development site or an alternative site nominated by the consent authority.

Q11. What are the views of the State and Commonwealth public authorities consulted in accordance with the Gateway determination?

The planning proposal has not yet received Gateway determination and consultation with the public authorities has not yet commenced.

#### Part 4 – Mapping

It is understood that mapping will be prepared by the City of Parramatta Council to accord with the standard instrument mapping layouts prior to the planning proposal

being reported to the Council for consideration. The planning proposal seeks amendments to Height of Buildings Map and Floor Space Ratio and Map.

Part 5 – Community consultation

Community consultation will be undertaken in accordance with the requirements prescribed by the Gateway determination.

Part 6 – Project timeline

A project timeline is yet to be determined however will be formulated following discussions with the City of Parramatta Council and confirmation of any additional information required to allow consideration of the planning proposal.

An indicative timeline for the planning proposal includes:

Milestone	Timeframe
Council report to endorse the PP for Gateway Determination	October 2018
PP submitted to the Department of Planning and Environment seeking Gateway	November 2018
Gateway issued	February 2019
Public exhibition and agency consultation	March 2019
Consideration of submissions and report back to Council	April 2019
Submission back to Department of Planning and Environment to finalise LEP amendments	May 2019
Amendments to be published	July 2019

## CONCLUSION

This planning proposal explains the intended effect of and provides a justification for a proposed amendment to the *Parramatta Local Environmental Plan 2011* (Parramatta LEP 2011). The planning proposal has been prepared in accordance with Section 55 of the *Environmental Planning and Assessment Act 1979* and the Department of Planning and Environment document 'A guide to preparing planning proposals' (August 2016).

The planning proposal relates to a single allotment, however is cognisant of a coordinated design over three contiguous land parcels situated in Parramatta CBD and seeks to amend the Parramatta LEP 2011 by revising limitations relating to building height and floor space ratio to allow for the redevelopment of the site.

The planning proposal describes how the intended outcome of the proposed LEP amendments align closely with the strategic directions established in State Government documents Plan for Growing Sydney, A Metropolis of Three Cities – Greater Sydney Region Plan, the Central City District Plan, the Greater Parramatta and Olympic Peninsular Plan, the CBD Planning Proposal and the Parramatta CBD Strategy.

It is considered that the LEP amendments sought by the planning proposal will allow for the accelerated delivery of both mixed use and high-density residential development in an area which is well serviced by public transport and infrastructure and has been identified as a key urban renewal precinct. The planning proposal is considered to have strong merit based on a sound analysis of relevant planning considerations and is submitted to Parramatta City Council for consideration.