

Planning Proposal



5-7 Charles Street & 116 Macquarie Street Parramatta

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EXECUTIVE SUMMARY

Planning Proposal – 5-7 Charles Street & 116 Macquarie Street Parramatta

In accordance with the provisions of section 55 of the Environmental Planning and Assessment Act 1979 and *A Guide to Preparing Local Environmental Plans* and *A Guide to Preparing Planning Proposals*, this Planning Proposal provides the following:

- Objectives or intended outcomes
- Explanation of Provisions
- Justification
- Community Consultation

Following meetings and representation to Council, at a meeting of 26 August 2013, Council resolved that *“the applicant’s preliminary concept to rezone land from B3 (Core Commercial) to B4 (Mixed Use) is supported and that the applicant be invited to proceed with a detailed planning proposal for the site.”* Two core issues relating to this Planning Proposal relate to: (1) achieving a high quality urban design solution for the site; and (2) justifying any potential loss of employment land. The summary-case for supporting the rezoning is outlined below.

- The subject site is currently zoned for commercial uses however its location and narrow width make it more appropriate for a residential floor plate. It has limited significance as a commercial site;
- The development of this site for residential uses will complement the buildings on the eastern side of Charles Street and create this precinct as a vibrant precinct of office and residences. This will increase business vibrancy within the area;
- The residential development of this site will assist in providing appropriate and well located housing in a Regional City with fantastic access to transport.
- The site has good access to social and transport infrastructure, including the railway station, ferry terminal and bus stops on Charles St. It is also located just two blocks from the River Reserve parklands and Robin Thomas Reserve.
- The site will have minimal impact on other nearby sites and yet is of a scale that allows for the provision of considerable housing numbers in Parramatta CBD;

The State Government’s Metropolitan Development Program provides clear monitoring Metropolitan housing trends. The key points supporting housing need are highlighted below:

- By 2031 Sydney will have 1.3M new residents which will require 545,000 new dwellings – that means 30,277 new homes each and every year to meet target.
- In March 2013 the State Government released an extensive housing strategy with urban activation precincts and a mix of significant sites and green-field development initiatives. This program identified 172,000 potential new sites which will be developed progressively. This is only 31% of the total housing requirement and represents 9,555 dwellings per year, if measured until 2031.
- Housing Data from 2008/09 – 2012/13 shows that the entire Sydney Region released 79,549 new homes. This represents an average of 15,909 dwellings per year in total.
- Sydney’s average growth (15,909) plus the recent release strategy (9,555) equals 25,464 new dwellings per annum. This is still well short of the 30,000+ new homes required each year.
- Significant new opportunities must be taken to provide new housing units. This proposed site is logically located and ripe for development as it is located close to transport and amenities within an identified Regional City.

PART 1 - OBJECTIVES OR INTENDED OUTCOMES

The intended outcome for the site is to allow a significant residential building on the site above ground level commercial uses.

Under the current zoning, "Residential Accommodation", which includes residential flat buildings, is prohibited. This amendment will allow for residential flat buildings.

The detail design of the overall building will be finalized following the overall design excellence process that will be part of the DA process. In broad terms however the optimum built form has been identified in the attached "Urban Design Report" prepared by Stanistic Architects (Appendix 1).

PART 2 – EXPLANATION OF PROVISIONS

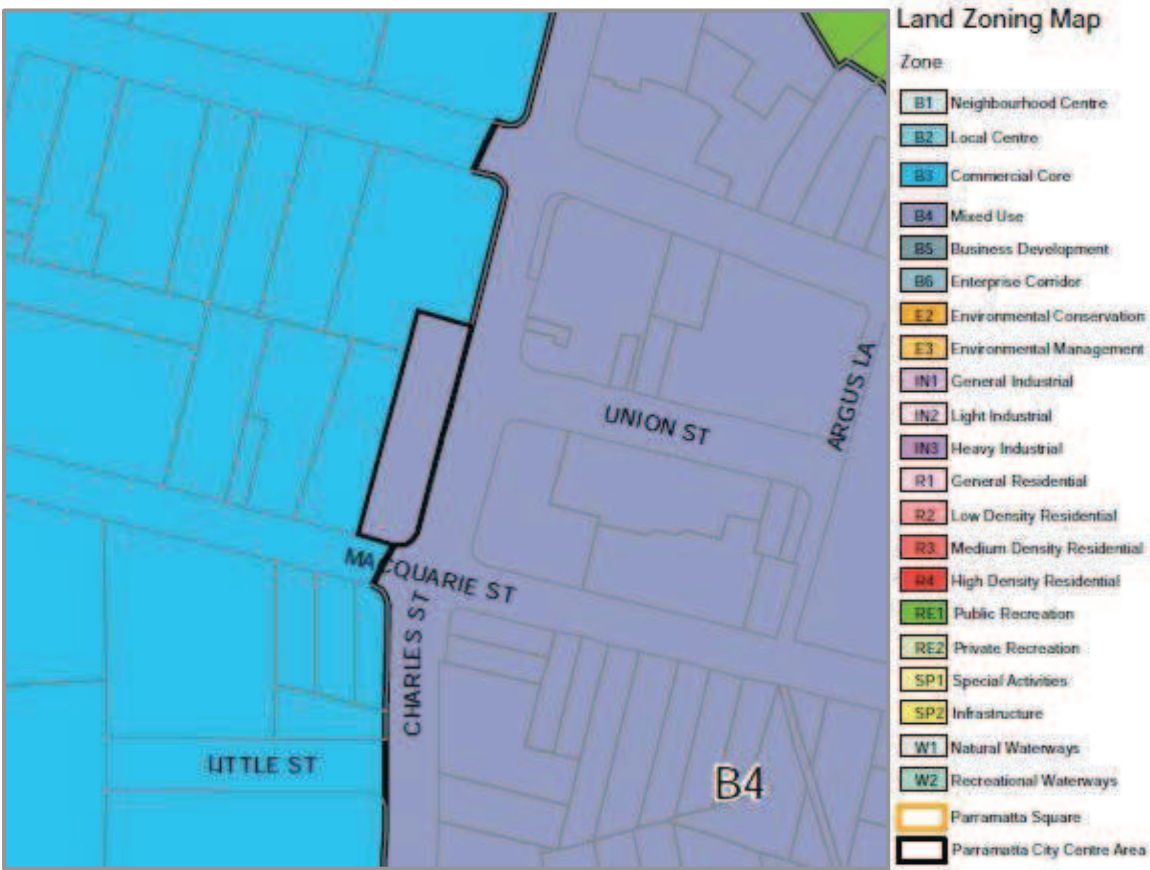
SUMMARY OF PROPOSED CHANGES TO PLANNING CONTROLS		
	Current (PCC LEP 2007)	Proposed
Zoning	B3 Commercial Core	B4 – Mixed Use
Floor Space Ratio	10:1 (“AE”)	19:1 (“AI”)
Height of Buildings	120m (“AC”)	136m (“AD”)

This planning proposal seeks to achieve the objectives and intended outcomes by seeking the following:

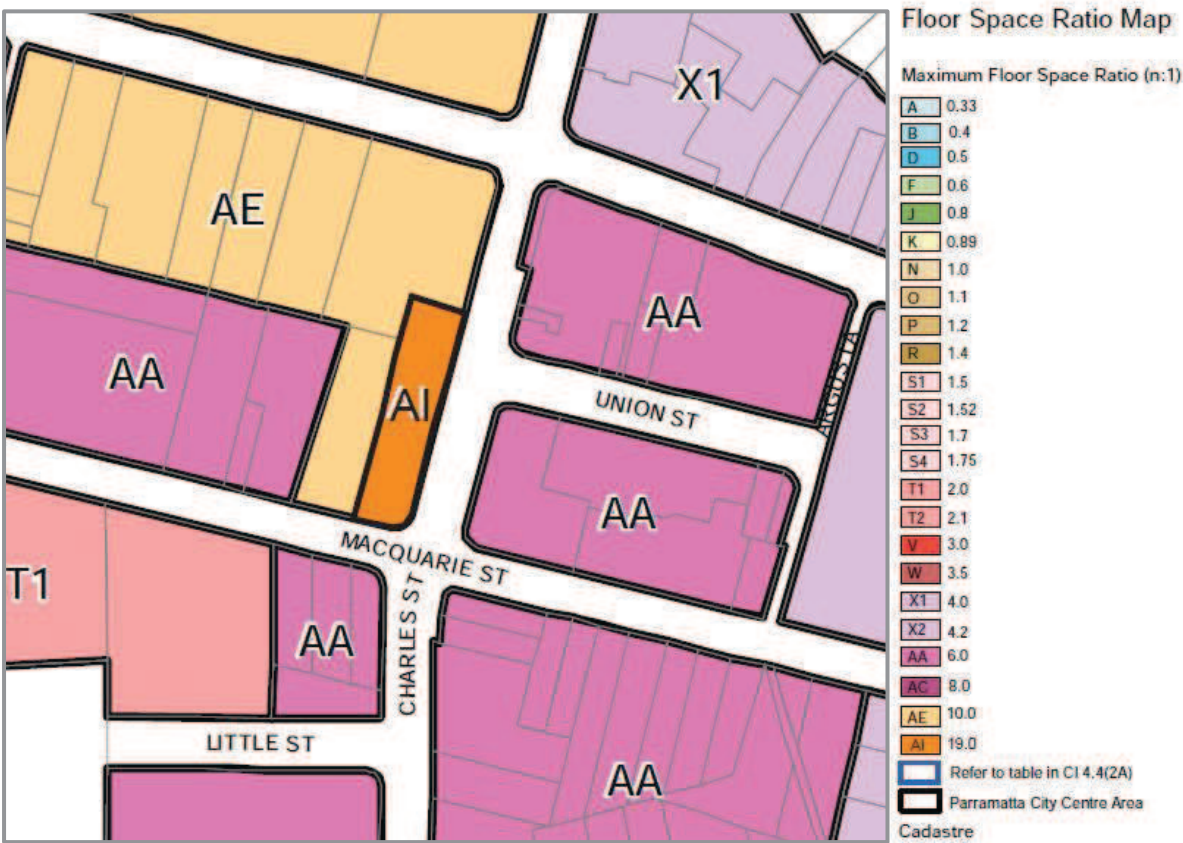
1. Amendment of the Parramatta City Centre Local Environmental Plan 2007 Land Zoning Map to “B4” – Mixed Use.
2. Amendment of the Parramatta City Centre Local Environmental Plan 2007 Floor Space Ratio Map to “AI” (19:1).
3. Amendment of the Parramatta City Centre Local Environmental Plan 2007 Height of Building Map to “AD” (136m).
4. The inclusion of a site specific clause ensuring that the building contains at least four (4) levels of retail/ commercial floor space above the basement parking.

Below are the proposed Zoning, Floor Space Ratio (FSR) and Height of Building (HOB) maps:

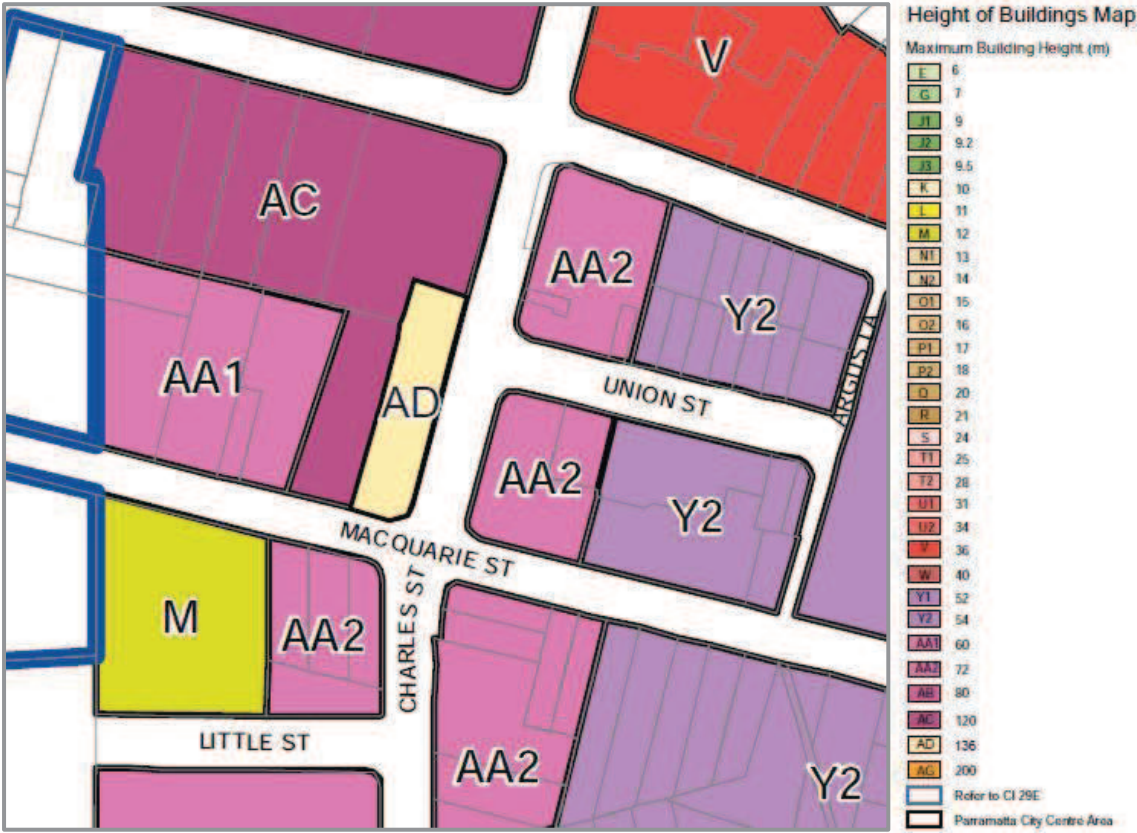
Map 1: Proposed Zoning Map



Map 2: Proposed Floor Space Ratio Map



Map 3: Proposed Height of Building Map



PART 3 – JUSTIFICATION

The NSW Department of Planning has a publication entitled “Guidelines for Preparing Planning Proposals”. It outlines a range of questions which will be answered as part of the Justification process.

Section A – Need for the planning proposal

1. Is the planning proposal a result of any strategic study or report?

This Planning Proposal follows the Planning Proposal prepared by Council titled “Amendment to Parramatta LEP 2011 – Amalgamation of Parramatta City Centre LEP 2007”. This proposal made several changes to the B3 zone within the town centre. Furthermore the City Centre controls are contained within a draft amendment to PLEP 2011. Within the context of this overall review, this Planning Proposal is lodged with Council. In confirmation of this approach Council resolved at its meeting of 26 August 2013 that:

“The applicant’s preliminary concept to rezone land from B3 (Core Commercial) to B4 (Mixed Use) is supported and that the applicant be invited to proceed with a detailed planning proposal for the site.”

At a meeting with the CEO and Mayor’s Office on 7 April 2014 the applicant was asked to review the scope of the urban design study and further test building height and building form within its overall context. The applicant also advised they would proceed with market research to determine what opportunities may exist to confirm the provision of a fixed number of commercial floor levels within any future building. Such an examination included specific focus on medical uses.

This Proposal is also underpinned by the Metropolitan Strategy for Sydney 2036 and Draft West Central Sub regional Strategy which clearly identifies the need for the bulk of new housing to be located within the Sydney Metropolitan area and near existing or emerging centres. It also follows the general direction of Parramatta City Centre Vision 2007.

All plans and strategies identify the Parramatta City Centre as a “major centre” within the Sydney context.

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

The Planning Proposal is considered to be the most appropriate means of achieving the stated objectives and intended outcomes. Depending on timing, it may be that this amendment can be incorporated into the City Centre amendments to PLEP 2011.

The planning proposal process allows for the integration of design excellence provisions, joint exhibition with the Development Application and a collaborative approach to the overall design and any planning agreements for the site.

3. Is there a net community benefit?

A net community benefit arises where the sum of all the benefits of a development or rezoning outweighs the sum of all costs. The justification to proceed with the planning

proposal has taken into consideration the public interest and the consequence of not proceeding with the rezoning and proposed changes in FSR.

Table 2 below provides an evaluation of the Planning Proposal against the key criteria for a Net Community Benefit Test set out in the Department of Planning's draft Centres Policy. The level of detail and analysis is proportionate to the size and likely impact of the proposed LEP amendment.

Based on the responses to the key evaluation criteria in Table 1, it is considered that the proposed changes to the Parramatta City Centre LEP 2007 will produce a net community benefit. There are very few costs to the community in a broad sense; however it is also acknowledged that massive benefits are also difficult to claim for a residential building. The key issue in terms of benefit is that a vibrant city centre needs people living in it. This will dramatically improve business viability and social dynamics over time as residents have a vested interest in the success of Parramatta City.

Table 1 – Net Community Benefit Test Assessment

Evaluation Criteria	Assessment	✓/x
Will the LEP be compatible with agreed State and regional strategic direction for development in the area (e.g. land release, strategic corridors, development within 800 metres of a transit node)?	The site is compatible with the strategic directions of the State which promote new development near transit nodes and major or emerging centres. The site is located within 400m of Parramatta Station Railway and Bus interchange as well as 250m from the Parramatta Ferry and the river parklands. Bus services exist on Charles Street.	✓
Is the LEP located in a global/regional city, strategic centre or corridor nominated within the Metropolitan Strategy or other regional or sub regional strategy?	The site is located within an identified Regional City as nominated in the Central West sub-regional strategy. The Planning Proposal will ultimately improve business viability and social dynamics as residents have a vested interest in the success of Parramatta City. Providing appropriate fringe-CBD sites which have people living in the City will be a tremendous benefit to business and city dynamics.	✓
Is the LEP likely to create a precedent or create or change the expectations of the landowner or other landholders?	The proposed LEP may create a small precedent for properties along the western side of Charles Street. It is contended that Charles Street genuinely is a mixed use area within the CBD and the eastern side has already been successfully developed with residential units and serviced apartments. This proposal suggests that it may be appropriate if the western side of Charles St were developed in a similar fashion, although not all blocks can be developed in the same way as this. The support for this Proposal is that the outer areas of the main CBD would be the most appropriate areas for residential accommodation to complement the significant commercial floor space already proposed in the CBD. Any precedent created however is limited due to the size and shape of the subject property. The total width is only 21m which makes it highly appropriate for residential development and more difficult for significant commercial floor plates that would be expected in a Regional City like Parramatta. To this end it will not create too much of a precedent unless	N

Evaluation Criteria	Assessment	✓/x
	other similarly located sites have the same constraints and locational attributes. The Employment Lands Study prepared by Hill PDA (submitted to Council) supports the difficulty of developing this site as a commercial use.	
Have the cumulative effects of other spot rezoning proposals in the locality been considered? What was the outcome of these considerations?	The key consideration in this instance relates to the total supply of employment lands within the CBD. A specific study around this issue has been prepared by Hill PDA and is submitted to Council. It asserts that the proposed rezoning will not have a negative impact on the overall supply of commercial floor space within Parramatta and that the site is surplus to needs. The other cumulative effect would be an increased residential population which is considered to add to the efficiency and effectiveness of infrastructure and enhance commercial viability of employment lands in the CBD.	✓
Will the LEP facilitate a permanent employment generating activity or result in a loss of employment lands?	The proposal may result in the loss of a <i>potential</i> commercial floor space by allowing residential uses within the building. It must be noted however that the subject site is more towards the fringe area of the main CBD precinct therefore meaning that a large commercial development is unlikely. The allowance of residential units on the site however means that an appropriate level of commercial floor space will be constructed and that the street frontage will be activated and the corner developed in a desirable urban design sense. It is argued that without a rezoning to permit residential units, no further development of this site for commercial uses will take place. Additionally the mixed use zone still permits commercial uses and so this proposal does not result in a <i>total</i> loss of employment lands. Site specific provisions which will ensure four (4) levels of commercial retail are provided are proposed in this Planning Proposal. The study by Hill PDA addresses the overall supply of commercial floor space in Parramatta and its ability to meet A-Grade requirements as well as examines the limitations of the sites width. It concludes that this proposal will not result in an unacceptable loss of employment lands.	✓
Will the LEP impact upon the supply of residential land and therefore housing supply and affordability?	There will only be a positive impact on the supply of residential land and the increase in small housing products near to railway lines increases the supply of affordable housing. Many issues impact affordability but one significant factor results to an appropriate supply of units in a form that is more affordable. Smaller sized units in a Regional City will assist supply and affordability.	✓
Is the existing public infrastructure (roads, rail, utilities) capable of servicing the proposed site?	All existing services are capable of taking additional accommodation proposed around the site. Parking controls within the LEP and DCP have all been prepared following the implementation of new planning controls for the CBD which allow for significant buildings. These controls limit traffic in the CBD to some extent. Traffic is an issue that can be	✓

Evaluation Criteria	Assessment	✓/x
Is there good pedestrian and cycling access? Is public transport currently available or is there infrastructure capacity to support future public transport?	assessed more fully following gateway approval. Pedestrian access is very good and cycling on street. The site is 400m from the Railway Station and 250m from the Parramatta Ferry. Inner city bus routes also run frequently with a bus stop on Charles Street immediately across from the subject site. A major interchange exists at Argyle Street.	✓ ✓
Will the proposal result in changes to the car distances travelled by customers, employees and suppliers? If so, what are the likely impacts in terms of greenhouse gas emissions, operating costs and road safety?	Locating people within a CBD will serve to revitalize areas, increase passive surveillance during the evenings and stimulate local business. It provides opportunity for people to live within the centre they may work within which will reduce car distances and travel times. A reliance on public transport and reduced travel times will improve greenhouse gas emissions, operating costs and road safety.	✓ ✓
Are there significant Government investments in infrastructure or services in the area whose patronage will be affected by the proposal? If so, what is the expected impact?	No negative impact. Indeed it is considered that residential accommodation will provide residents with improved access to government agencies and the 'justice precinct' within the CBD.	✓
Will the proposal impact on land that the Government has identified a need to protect (e.g. land with high biodiversity values) or have other environmental impacts? Is the land constrained by environmental factors such as flooding?	No. The site is slightly affected by Acid Sulphate Soils as a Category 4 area just impacts the northern edge of the site. The rest of the site is Category 5. It is understood the site is slightly flood affected by the 1:100 year event. This site is an established urban property on higher land than new residential development towards the river and it is considered that appropriate studies and the determination of floor levels can be carried out after Gateway approval. The Parramatta City Flood Maps have been obtained for the site and show the extent of affectation.	✓ ✓
Will the LEP be compatible or complementary with surrounding land uses?	The LEP will be generally compatible with development on the eastern side of Charles St and other residential buildings within the North-East Quadrant of the CBD. This proposal does seek to amend the height by increasing it by 16m to 136m and it must be noted that this is an iconic tower. Compatibility therefore is within the context of a major city centre. The FSR will also increase however this is essentially a product of the building form. It is contended that height and setbacks are the primary drivers of built-form character and these have been well examined and are considered to appropriate to the CBD (refer to Appendix 1 which illustrates the urban design analysis done for the site. The FSR is currently modeled at 18.6:1.	✓

Evaluation Criteria	Assessment	✓/x
What is the impact on amenity in the location and wider community? Will the public domain improve?	In a practical sense many of the surrounding sites are well established commercial sites and a school exists to the west. These sites are unlikely to be further developed soon and so this building will be significantly taller than others nearby for some time. Its residential use and slender shape will give it a uniqueness and elegance appropriate to the future of Parramatta CBD. The proposal will have an impact on traffic in the local area however it is considered that the impact on traffic has been the subject of significant assessment in the CBD planning controls. It is generally considered that the overall impact from more residents in the CBD will be positive as it enriches the culture and social fabric of Parramatta. Yes. Well designed apartments appropriate to the CBD are attractive and improve the public domain. This is demonstrated in the Urban Design Report. Visually it is considered that the impact will be positive and it will allow for the activation of street frontages and the definition of road networks through building form. This is intended to be a high quality significant residential building within Parramatta.	N ✓
Will the proposal increase choice and competition by increasing the number of retail and commercial premises operating in the area?	This proposal does not alter the amount of allowable commercial space but rather seeks to simply allow for a residential land use to be incorporated. It is obvious however that residential space is the key driver in this context. The report by Hill PDA for this site addresses the extent of commercial space in Parramatta and also examines future take up opportunities. This proposal will certainly facilitate the activation of some ground level commercial space which is likely to contain uses which serve nearby residents and tourists. This is considered an advantage from the current use of the site and one that will benefit the area.	N
If a stand-alone proposal and not a centre, does the proposal have the potential to develop into a centre in the future?	This proposal is part of a Regional City.	✓
What are the public interest reasons for preparing the draft plan?	The public interest for preparing the draft plan will be a number of economic and social benefits including: - It will result in a significant and attractive building, compared with what is currently on the site, with lovely views over the river precinct and reserves to the north and east; - It will bring more people in proximity to local commercial businesses and therefore stimulate and consolidate local business within the CBD; - Provide a new mix of more affordable housing in a Regional City thereby creating greater housing choice for Sydney residents and assist in alleviating escalating unit prices; - The location of smaller housing units near to	✓

Evaluation Criteria	Assessment	✓/x
What are the implications of not proceeding at this time?	good public transport. - It will improve sustainability indicators due to the site's proximity to public transport and business services. - The proposal will activate Charles Street as a vital 'edge' where people live and work. - It will allow for the more-efficient use of existing public, economic and social infrastructure by local residents. No immediate implications at this time, except for lost opportunity to develop quality residential accommodation near to transport within a significant centre. Continuing development around the CBD is critical to gaining momentum for sustainable longer term growth. Development of this magnitude is always subject to market 'waves' and the current opportunity seeks to take advantage of this current 'wave'. If it is missed then it can be substantial time until the next cycle kicks in and stagnation can occur.	✓

Section B – Relationship to strategic planning framework.

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

4.1 Sydney Metropolitan Strategy 2036:

The site is within a nominated Regional City within the Sydney Metropolitan Strategy 2036. These cities have a radii of 2km and aim to contain the full range of business, government, retail, cultural, entertainment and recreational activities.

The Metropolitan strategy established a target of 95,500 additional homes within the west central subregion to 2031 to accommodate the needs of the existing and future population. Section WC 1.3.1 in the Subregion Strategy earmarks Parramatta LGA for 21,000 of these homes up to 2031.

The subregion strategy notes (p.85):

“housing stress is a significant problem in the subregion. For lower income households, the subregion experiences relatively high levels of housing stress which is an indicator of poor housing affordability.”

This Planning Proposal will assist in alleviating this pressure and generally accords with locating people near good public transport.

Table 2 – Relationship to Strategic Planning Framework

METROPOLITAN PLAN FOR SYDNEY 2036	
STRATEGIC DIRECTION A: STRENGTHENING THE 'CITY OF CITIES'	COMMENT
OBJECTIVE A2 To achieve a compact, connected, multi-centred and increasingly networked city structure.	It is the clear intent of the Metropolitan Plan to establish each centre with appropriate development to stimulate appropriately located housing and employment uses to reduce travel times around the city. This proposal accords with this vision and will allow more people to live in attractive, well located suburbs which currently comprise land of marginal viability for its current zone. It is also a key objective of the NSW Government to locate more people closer to their places of work. This achieves that objective as well.
OBJECTIVE A3 To contain the urban footprint and achieve a balance between greenfields growth and renewal in existing areas.	Proposal will provide for additional housing within Sydney's major centres and will not contribute to the growth of the urban footprint.
STRATEGIC DIRECTION B: GROWING AND RENEWING CENTRES	COMMENT
OBJECTIVE B1 To focus activity in accessible centres.	The Planning Proposal will make use of existing infrastructure, increase housing supply, allow more trips to be made by public transport and strengthen the customer base for local business in Parramatta CBD.
Action B1.1 Plan for centres to grow over time.	Achieved.
Action B1.3 Aim to locate 80% of all new housing within the walking catchments of existing and planned centres of all sizes with good public transport.	Achieved.
OBJECTIVE B3 To plan for new centres and instigate a program for high quality urban renewal in existing centres serviced by public transport.	This is not a new centre but a significant city within greater Sydney. Some of the key outcomes of this objective which are supported by the Planning Proposal are: • revitalise and utilise an existing site within the CBD which has some limitations for commercial development and to create a vibrant and attractive residential building; • enhance public domain and civic spaces, particularly those along the Foreshore and Robin Thomas Reserve; • utilise existing public transport services; • create a real sense of place and residential character along Charles Street. This site will also promote high quality, sustainable residential development.
Action B3.2 Plan for urban renewal in identified centres.	

STRATEGIC DIRECTION D: HOUSING SYDNEY'S POPULATION	COMMENT
OBJECTIVE D1 To ensure an adequate supply of land and sites for residential development. Action D1.1 Locate at least 70 per cent of new housing within existing urban areas and up to 30 per cent of new housing in new release areas. Action D1.2 Reflect new subregional housing targets in Subregional Strategies and Local Environmental Plans, and monitor their achievement.	This Planning Proposal will allow for the redevelopment of a site for increased residential development. This Planning Proposal seeks to locate new housing within Sydney's existing urban centre. The state Plan sets a target to increase the proportion of people living within 30 minutes by public transport of a strategic centre, as part of Priority E5 'Jobs closer to home'. The central west sub-region aims to ensure that at least 80 per cent of new dwellings are located within 30 minutes by public transport of a strategic centre. This Planning Proposal achieves this objective.
OBJECTIVE D2 To produce housing that suits our expected future needs. OBJECTIVE D3 To improve housing affordability. Action D3.1 Explore incentives to deliver moderately priced rental and purchase housing across all subregions.	The Planning Proposal will provide for additional dwelling units to meet the expected future needs of the broader Sydney community. It is increasingly evident that significant demand exists in the future for smaller housing types. Vertical accommodation is also essential to meeting housing targets in the most sustainable fashion. Increasing the supply of housing that is in high demand will directly contribute to improved affordability, particularly as the world's population and Australia's population are now growing so quickly. This process will also flow through to rental affordability as well which has strong ties to capital value. Great diversity brings greater choice allowing young residents or first home buyers to access small housing types near to transport. This is a strong social benefit as well as one that will improve overall affordability.
OBJECTIVE D4 To improve the quality of new housing development and urban renewal.	This new housing will have direct access to all areas of the CBD and is within easy walking distance to Parramatta River and associated parklands and only two blocks to Robin Thomas Reserve to the east. Council's initiatives in terms of Design Excellence will also ensure a high quality built outcome on this site.
STRATEGIC DIRECTION E: GROWING SYDNEY'S ECONOMY	COMMENT
OBJECTIVE E1 To ensure adequate land supply for economic activity, investment and jobs in the right location.	This proposal will provide employment generating lands but not of the quantity that it may if it was a fully developed commercial building. It is considered (and supported by the Economic Report) that the site is of inferior size and shape and location for A-grade commercial floor space.

OBJECTIVE E2 To focus Sydney's economic growth and renewal, employment and education in centres.	The site will contribute to the renewal of this part of Parramatta CBD. Providing places for people to live in cities is an integral part of the renewal and revitalization process.
OBJECTIVE E3 To provide employment lands to support the economy's freight and industry needs. Action E3.2 Identify and retain strategically important employment lands	The site is deemed to be not strategically significant.
OBJECTIVE E4 To provide for a broad range of local employment types in dispersed locations. Action E4.1 Ensure all new LEPs provide for a broad range of local employment types	Employment uses are permissible in the mixed use zone.
OBJECTIVE E5 To increase and diversify the jobs and skills base of Western Sydney	This Planning Proposal creates affordable housing in a strong employment centre.
DRAFT WEST CENTRAL SUBREGION STRATEGY	
CENTRES AND CORRIDORS	COMMENT
OBJECTIVE B2 Increase densities in centres whilst improving livability	This Planning Proposal provides for increases in residential density in the major Regional City of Parramatta. The strategy notes the following: <i>"To ensure that the people living in the West Central Subregion have better access to services, public transport and employment opportunities, planning for provision of higher density housing within existing centres should be given priority."</i> This Planning Proposal assists in achieving this objective. It does this by creating affordable opportunities for people to locate near these facilities. These include the "justice precinct", government agencies and existing transport infrastructure. Livability is enhanced as well due to proximity to waterfront reserves and attractive parks. This project will increase the viability of these areas.
OBJECTIVE B4 Concentrate activities near public transport	The planning proposal assists in achieving this objective. Trains, buses and ferries are all within 400m of this site. It is possibly better located than most sites in terms of appropriateness for high density residential living.

HOUSING	COMMENT
OBJECTIVE C1 Ensure adequate supply of land and sites for residential development	The Subregion Strategy notes: <i>“Across the metropolitan region a target of 60–70 per cent of new housing will be accommodated in existing urban areas, focused around centres and corridors. This will take advantage of existing services such as shops and public transport and reduce development pressures in other parts of Sydney. The housing target of 95,500 between 2004 and 2031 will be accommodated within existing urban areas. This is a strategic target will be reviewed on a five yearly basis and will be informed annually through the Metropolitan development Program (MDP).”</i> C1.3.1 allocates Parramatta LGA 21,000 new target dwellings. This Planning Proposal helps achieves this. Given there are very few, if any, green-field sites left in this sub region, development sites such as this one become very important.
OBJECTIVE C2 Plan for a housing mix near jobs, transport and services Action C2.1 Focus residential development around centres, town centres, villages and neighbourhood centres. C2.1.1 West Central councils to ensure location of new dwellings maintains the subregion's performance against the target for State Plan Priority E5 C2.1.2 Councils to provide in their LEPs, zoned capacity for a significant majority of new dwellings to be located in strategic and local centres. Action C2.3 Provide a mix of housing. C2.3.2 Local Councils to provide for an appropriate range of residential zonings to cater for changing housing needs.	The proposed mixed use zoning will allow some people to locate near to jobs while still providing an activated streetscape. Parramatta City has done much work in recent years to attract Government offices to the CBD and also create the “justice precinct” in the CBD. This Planning Proposal is also well accessed to transport and services. <i>“The state Plan sets a target to increase the proportion of people living within 30 minutes by public transport of a strategic centre, as part of Priority E5 ‘Jobs closer to home’. To maintain the inner north sub-region's performance on this state Plan target, West Central councils should ensure that at least 80 per cent of new dwellings are located within 30 minutes by public transport of a strategic centre.”</i> This Planning Proposal helps achieve these actions. The Planning Proposal will provide for a mix of housing in a broader shire wide sense. This proposal however will focus more on smaller residential units with the likely dominance of two-bedroom units.
OBJECTIVE C3 Renew local centres	N/A.
OBJECTIVE C4 Improve housing affordability Action C2.3 Improve the affordability of housing	The strong demand for units in Sydney is being driven by several markets: (1) ageing residents seeking to down size and utilise public transport services; (2) overseas investors and families purchasing units for their children; (3) young first home buyers who have grown up in Sydney and wish to remain close to friends and family. The need for affordability is a major consideration for many investors and first home buyers. The

	strategy notes: <i>"housing stress is considered a significant problem for the west central subregion. This is an indicator of poor housing affordability. The Strategy encourages a greater mix of housing types, especially in centres with good public transport, to accommodate changing demands of existing residents and to support the workforce."</i> Units such as those proposed in this Planning Proposal will assist in providing affordability in a lively Regional City which has excellent public transport connections by rail, bus and ferry. The best way to deal with affordability is to continue to meet adequate supply. This Proposal within Parramatta is a logical and appropriate way to assist with alleviating issues of limited supply which compound affordability issues.
OBJECTIVE C5 Improve the quality of new development and urban renewal Action C5.1 Improve the design of new development and urban renewal	SEPP 65 and local design panels help in this regard. Parramatta's new provisions for Design Excellence will also ensure this outcome.
OTHER	In terms of Environment and Heritage the following is recommended: <i>"As the second oldest European settlement in Australia, Parramatta contains significant historical artefacts and archaeological sites. The Strategy also states that when preparing Principal LEP's Council should incorporate measures that will protect identified Aboriginal cultural heritage values and provide for ongoing participation of Aboriginal communities in the decision-making process."</i> This site is fully developed as a low rise commercial property and it is not considered to be of value or contain artefacts. Studies can be carried out post Gateway approval if they are considered necessary. It is contended however that major studies for heritage are not really required for this established site. In relation to parks and open space the Strategy notes: <i>"...that the provision of new open space should be considered as part of large scale infill developments. Local Councils should plan for the acquisition of lands for local open space as part of developer contributions. Urban civic spaces and pedestrianised areas should be considered in the planning for future growth of Strategic Centres and smaller local centres."</i> While no open space is possible or desired on this site, significant residential development along with future rates increases will allow for substantial improvement to nearby parks and public areas. Initially this will occur via Section 94 contributions or VPA.

4.2 NSW 2021: Plan to make NSW number 1

The NSW 2021 Plan essentially complements the Metropolitan Strategy. It is a ten year plan built around five broad strategies: (1) rebuild the economy, (2) return quality services, (3) renovate infrastructure, (4) restore government accountability and (5) strengthen local environments and communities. The Plan seeks to secure +100,000 new jobs in the State by 2021 of which +60,000 will be provided in non-Regional localities. It also targets the provision of at least +25,000 new homes per annum in Sydney to 2021. This specific target is listed in Goal No. 5 which aims to improve affordability. With 2.25M new residents expected in NSW to 2036 it is expected that 75% of these will live in Sydney. This will continue to put an upward pressure on housing prices and rent unless supply is increased to meet demand.

Goal No's 8 and 9 also seek to make public transport and attractive and viable alternative for residents. While the Plan focuses on service quality, this will also make housing near railway stations are more attractive option for residents.

Goal 20 of the NSW 2021 Plan seeks to 'Build Liveable Centres'.

A priority action is:

Work closely with local councils and communities to deliver local land use controls that identify land use zonings and appropriate development outcomes to support the delivery of housing and employment targets in the metropolitan and regional strategies

4.3 Draft Metropolitan Strategy for Sydney

Metropolitan priorities:

- *support highly diverse and competitive employment growth opportunities by renewing and growing Parramatta CBD (and its surrounds) and providing higher order services and job opportunities for greater Western Sydney's growing population.*
- *connect and invest in the subregion's network of major employment hubs.*
- *extend the Global Economic Corridor to connect with Parramatta CBD and Castle Hill and Norwest.*
- *strengthen Sydney Olympic Park's connection to Parramatta and Global Sydney through the redevelopment of the Parramatta Road Corridor.*
- *strengthen connections between Major Centres at Blacktown and Castle Hill to Parramatta CBD.*
- *support cross-regional connections especially between Macquarie Park and Parramatta.*
- *protect State-significant heritage sites and values and leverage advantages from the subregion's vibrant culture and broad ethnic diversity.*
- *strengthen cultural and recreation assets including the Parramatta River and its foreshores, Parramatta Park, Bicentennial Park and colonial heritage around Parramatta.*

The Parramatta CBD features significantly in several of the key priorities for the west central region (listed above). Specifically for Parramatta the draft strategy notes:

- *plan for improved transport connections to its wider catchment in line with the Long Term Transport Master Plan*
- *provide capacity for at least 21,000 more jobs to 2031.*

This Planning Proposal proposes a mixed use zone which supports the above priorities. It is currently proposed however to develop the site primarily for residential uses which will, over time, support the cultural and recreational assets of the City. It will also underpin the effectiveness and efficiency of transport infrastructure and other infrastructure invested in the City.

5. Is the planning proposal consistent with the local council's Community Strategic Plan, or other local strategic plan?

Parramatta 2038 Community Strategic Plan

The proposal will assist in the attainment of many of the objectives in the Parramatta 2038 Community Strategic Plan. The Plan itself seeks to implement some big vision into 2038 which will be its centenary as a City. This vision has large aims involving the establishment of riverfront parklands and entertainment precincts, light rail systems and strong employment centres.

It is strongly contended that for this vision to be achieved centres must be allowed to develop with people living in them. This will in turn foster a strong diversity and sense of community. From this foundation the vision for Parramatta can be met. A city that has no life or residential presence after dark struggles to thrive and also can become potentially unsafe. Furthermore, the vision for new transport system also requires significant users to make it efficient and effective. Density within and near the major centres is crucial to delivering this vision sustainably.

Page 9 of the Strategy answers the question of "What might change?"

Areas around the CBD, Westmead, Rydalmere and Camellia will change the most. When plans for improving the city with better parklands, light rail, river pathways, and better motorway connections (M4, M2 and WestConnex) are realised, more housing and more jobs will be created in a sustainable way that minimizes impacts on existing and future residents. Growth is likely along light rail corridors, around rail stations and on bus priority routes.

This proposal starts to provide the appropriate zoning for appropriate sites in appropriate locations to help achieve this vision. This site is within an easy walking distance to railway station and to the riverfront reserve areas. This is where people should be living within the Parramatta CBD catchment and broader catchment areas.

One of the noted indicators of success for Urban Vitality is "increase in people counts (CBD locations)". A strong residential population within the CBD will greatly assist with creating strong vitality within the town centre which is required to stimulate the new business which is desired for the area.

The Strategy also notes the need to consolidate a good ferry service to Parramatta. This Proposal is well located to these services.

Parramatta currently provides a significant proportion of higher density housing and this is identified as needing to continue to meet appropriate housing supply:

Housing supply and choice shape an area's socio-demographic make-up, quality of life, rate of growth, level of investment, cost of housing and service needs. Housing costs can exclude service workers from choosing jobs in areas that they can't afford to live near. Parramatta must meet this demand, and provide housing choice so executives and senior managers can also live close to work.

Parramatta City Centre Vision 2007

This Vision sets the strategic framework for the growth of the Parramatta City Centre:

Parramatta will continue to strengthen its role as a regional city and successful second CBD for Sydney, based on a highly competitive commercial office market, retail, public space and a range of facilities including cultural, medical, educational, tourism and recreational. It will also benefit from a unique inner city residential living environment that values heritage assets and the natural environment. The centre will continue to plan strategically to maintain its position as an accessible primary business services centre for Western Sydney as a significant business location for metropolitan Sydney.

This proposal is considered to assist with the attainment of this vision.

City Centre Public Domain Framework Plan 2012

The City Centre Public Domain Framework Plan contains principles to reinforce or enhance the public domain - streets, public spaces and parks. Importantly, it identifies that the Parramatta Wharf Square (Charles Street Square) at the northern end of Charles Street will become an important public space that connects the river to the city.

The Urban Design Report (**Appendix 1**) deals with this Plan in more detail and confirms that the translation of policy into practice is possible. The Planning Proposal accords with the general vision of this Plan.

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

The Planning Proposal has been considered in relation to the following applicable State Environmental Planning Policies (SEPPs). It is not considered that the planning proposal contains any provisions that fail to accord with the application of those SEPPs:

State Environmental Planning Policies		Applies	Consistent
1	Development Standards	Yes	✓
4	Development Without Consent & Miscellaneous Development	Yes	✓
6	Number of Storeys in a Building	Yes	✓
14	Coastal Wetlands		N/A
15	Rural Landsharing Communities		N/A
19	Bushland in Urban Areas		N/A
21	Caravan Parks		N/A
22	Shops & Commercial Premises	Yes	✓
26	Littoral Rainforests		N/A
29	Western Sydney Recreation Area		N/A
30	Intensive Agriculture		N/A
32	Urban Consolidation (Redevelopment of Urban Land)	Yes	✓
33	Hazardous & Offensive Development		N/A
36	Manufactured Home Estates		N/A
39	Spit Island Bird Habitat		N/A
41	Casino Entertainment Complex		N/A
44	Koala Habitat Protection		N/A
47	Moore Park Showground		N/A
50	Canal Estate Development	Yes	✓

52	Farm Dams & Other Works Land/Water Management Plan Areas		N/A
55	Remediation of Land	Yes	✓
59	Central Western Sydney Regional Open Space and Residential		N/A
60	Exempt & Complying Development	Yes	✓
62	Sustainable Aquaculture	Yes	✓
64	Advertising & Signage	Yes	✓
65	Design Quality of Residential Flat Development	Yes	✓
70	Affordable Housing (Revised Schemes)	Yes	✓
71	Coastal Protection		N/A
	(Affordable Rental Housing) 2009	Yes	✓
	(Building Sustainability Index: BASIX) 2004	Yes	✓
	(Exempt & Complying Development Codes) 2008	Yes	✓
	(Housing for Seniors or People with a Disability) 2004	Yes	✓
	(Housing for Seniors or People with a Disability) 2004	Yes	✓
	(Infrastructure) 2007	Yes	✓
	(Kosciuszko National Park–Alpine Resorts) 2007		N/A
	(Kurnell Peninsula) 1989		N/A
	(Major Development) 2005		N/A
	(Mining, Petroleum Production & Extractive Industries) 2007		N/A
	(Penrith Lakes Scheme) 1989		N/A
	(Rural Lands) 2008		N/A
	(SEPP 53 Transitional Provisions) 2011		N/A
	(State & Regional Development) 2011	Yes	✓
	(Sydney Drinking Water Catchment) 2011		N/A
	(Sydney Region Growth Centres) 2006		N/A
	(Temporary Structures) 2007		N/A
	(Urban Renewal) 2010	Yes	✓
	(Western Sydney Employment Area) 2009		N/A
	(Western Sydney Parklands) 2009		N/A
	Greater Metropolitan REP No 2–Georges River Catchment		N/A
	Sydney REP (Sydney Harbour Catchment)		N/A
	Sydney REP No 18 - Transport Corridors	Yes	✓
	Draft SEPP (Competition)	Yes	✓

Table 3 – Assessment against relevant State Environmental Planning Policies

Specific comments in relation to the more significant SEPPs are provided below:

6.1 SEPP 32 – Urban Consolidation:

It is not being suggested that this Planning Proposal is caught by SEPP 32 significant site provisions in this instance. The proposal however, is consistent with the intent of SEPP 32 which aims to allow the redevelopment of suitable larger urban sites for residential development of over 50 dwellings. The proposal represents sound planning and is consistent with the objectives relating to urban consolidation included in the Metropolitan Plan for Sydney 2036.

Part of this overall assessment suggests that this commercial site would be better utilised as a mixed use site. A comprehensive economic report for the site has been completed to assist in this argument that the land is not a prime employment site and is appropriate for rezoning.

6.2 SEPP 55 – Remediation of Land

SEPP 55 provides that a consent authority must not consent to the carrying out of development unless it has considered whether the land is contaminated and if the land is contaminated, that

the land is suitable for the proposed use(s) within the development. Where remediation is required to make the land suitable for the proposed use(s), the land is required to be remediated before the use commences.

The site has not been studied previously in respect of this issue however it has been the subject of a commercial building for many years. It is considered highly unlikely that site is contaminated. In the event that the site is developed, this can all be done at the appropriate stage and additional studies provided as necessary.

6.3 SEPP 65 - Design Quality of Residential Flat Development

Clause 28 of the SEPP requires that in preparing an environmental planning instrument that makes provision for residential flat development, a provision shall be included in the instrument to ensure the achievement of design quality in accordance with the design quality principles and have regard to the publication Residential Flat Design Code.

It is noted that SEPP 65 will be required to be considered during the assessment of any future development on the site.

The proposed zonings and development standards would not preclude the achievement of SEPP 65 Principles and rules of thumb at any future development stage. The separation distances and solar access principles have been considered in the conceptual design of building envelopes. This issue and overall design quality has been comprehensively studied in the Urban Design Report relating to this proposal. This report has also undertaken a comprehensive analysis of solar access and cross ventilation. The indicative unit layouts and building separations have all had significant analysis in relation to the overall issue of amenity.

Furthermore, Council's LEP 2007 and draft LEP applying to the site each contain provisions requiring design excellence to be achieved. This Proposal seeks approval from the Director General to have this achieved via a collaborative 'jury' working with the main architect. If this is not approved, a competitive process will apply in line with the LEP.

7. Is the planning proposal consistent with applicable Ministerial Directions (s. 117 directions)?

Table 4 – Assessment against Ministerial Directions

Relevant Direction	Response
1.1 Business and Industrial Zones	<i>The objectives of this direction are:</i> <i>(a) encourage employment growth in suitable locations,</i> <i>(b) protect employment land in business and industrial zones, and</i> <i>(c) support the viability of identified strategic centres.</i> <i>This direction applies when a relevant planning authority prepares a planning proposal that will affect land within an existing or proposed business or industrial zone (including the alteration of any existing business or industrial zone boundary).</i> <i>This Direction aims to preserve such lands, however a planning proposal may be inconsistent with the terms of this direction only if the relevant planning authority can satisfy the Director-General of the Department of Planning (or an officer of the Department nominated by the Director-General) that the provisions of the planning proposal that are inconsistent are:</i> <i>(a) justified by a strategy which:</i> <i>(i) gives consideration to the objective of this direction, and</i> <i>(ii) identifies the land which is the subject of the planning proposal (if the planning proposal relates to a particular site or sites), and</i>

	(iii) is approved by the Director-General of the Department of Planning, or (b) justified by a study (prepared in support of the planning proposal) which gives consideration to the objective of this direction, or (c) in accordance with the relevant Regional Strategy or Sub-Regional Strategy prepared by the Department of Planning which gives consideration to the objective of this direction, or (d) of minor significance. This Planning Proposal does not reduce the supply of employment lands in Parramatta however it does seek to introduce residential development as a permissible use – i.e. it proposes a mixed use zone. The intent is that the site will be developed as a residential tower above four levels of commercial/ retail floors activating the street level. In effect this will reduce the <i>potential</i> amount of commercial land that could be developed on the site because the zone now would allow for residential uses. An Economic Report was carried out on this site by Hill PDA which assesses the land in some detail and justifies the rezoning in accordance with this Direction (Appendix 2). In summary, this Study concludes that: • The commercial office market in Parramatta CBD appears to be performing reasonably well at the current time with low vacancy in A grade office space, positive market absorption over the last few years and a number of high profile Government and private sector tenancies; • There is a high level of commercial office development in the pipeline which will be concentrated in the central CBD area and, further into the future, in the auto alley area to the south; • In the context of the location of the Subject Site, local particularities and site constraints it is not considered to offer strong potential for redevelopment for commercial office uses under the existing zone. The most likely outcome of retaining the existing zoning or the 'do nothing' option is the perpetuation of current uses and the continued under-utilisation of the Subject Site; • The Subject Site is not considered to be 'significant' to commercial office floorspace supply in context of the Parramatta CBD and Metropolitan Sydney and any commercial floor plates would not be considered to be A Grade office space and may be subject to greater vacancy rates; • Compared to the 'do nothing' option the planning proposal would facilitate a higher and better use of the Subject Site and support a range of positive economic impacts from which Parramatta CBD would benefit. These include additional job opportunities, more residential in the CBD and additional household retail expenditure for existing and future businesses to capture; • Based on the positive economic impacts of the planning proposal it would yield a greater contribution towards the aims and objectives of relevant planning policies and strategies comparative to the 'do nothing' option; • Construction will generate 251 jobs years directly in construction and a total of 922 job years through production and consumption induced multiplier impacts; and • The building will provide 115 permanent jobs on site which is around 50 jobs more than would be provided assuming both existing buildings were occupied. The study notes that this proposal "<i>would not contravene the relevant Ministerial Section 117 Direction 1.1</i>". It is considered the objectives of this Direction have been well considered and that this site is of minor employment significance within Parramatta's and Sydney's context (clause (d)). The Economic Report also gives consideration to the objectives of this Direction in compliance with clause (b).
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2.1 Environment Protection Zones	(4) A planning proposal must include provisions that facilitate the protection and conservation of environmentally sensitive areas. (5) A planning proposal that applies to land within an environment protection zone or land otherwise identified for environment protection purposes in a LEP must not reduce the environmental protection standards that apply to the land (including by modifying development standards that apply to the land)..." The Sydney REP (Sydney Harbour Catchment) extends up to Parramatta however the subject site is just outside the prescribed area.
2.3 Heritage Conservation	The objective of this direction is: (1) to conserve items, areas, objects and places of environmental heritage significance and indigenous heritage significance. A planning proposal must contain provisions that facilitate the conservation of: (a) items, places, buildings, works, relics, moveable objects or precincts of environmental heritage significance to an area, in relation to the historical, scientific, cultural, social, archaeological, architectural, natural or aesthetic value of the item, area, object or place, identified in a study of the environmental heritage of the area, (b) Aboriginal objects or Aboriginal places that are protected under the National Parks and Wildlife Act 1974, and (c) Aboriginal areas, Aboriginal objects, Aboriginal places or landscapes identified by an Aboriginal heritage survey prepared by or on behalf of an Aboriginal Land Council, Aboriginal body or public authority and provided to the relevant planning authority, which identifies the area, object, place or landscape as being of heritage significance to Aboriginal culture and people. This Planning Proposal seeks only to amend an existing zone within a comprehensive LEP which includes the above provisions. To that end this Proposal complies with this Direction. The site is located adjacent to a property with heritage buildings and this issue has been considered in the overall Urban Design Report and will be assessed further at the DA stage.
3.1 Residential Zones	The objectives of this direction are: (a) to encourage a variety and choice of housing types to provide for existing and future housing needs, (b) to make efficient use of existing infrastructure and services and ensure that new housing has appropriate access to infrastructure and services, and (c) to minimise the impact of residential development on the environment and resource lands. The land is not yet residentially zoned, however the proposed zone does allow for residential uses. Notwithstanding the proposed development will meet the objectives outlined above.
3.4 Integrated Land use and Transport	(1) The objective of this direction is to ensure that urban structures, building forms, land use locations, development designs, subdivision and street layouts achieve the following planning objectives: (a) improving access to housing, jobs and services by walking, cycling and public transport, and (b) increasing the choice of available transport and reducing dependence on cars, and (c) reducing travel demand including the number of trips generated by development and the distances travelled, especially by car, and (d) supporting the efficient and viable operation of public transport services, and (e) providing for the efficient movement of freight.

	It is considered that the proposal achieves these objectives by virtue of access to existing transport infrastructure and significant employment lands.
4.1 Acid Sulphate Soils	Council's planning maps indicate that the site is slightly affected by acid sulphate soils. The site is generally noted as Category 5 with the northern edge of the site is noted as Category 4. The planning proposal is considered to be consistent with the Direction on Acid Sulphate Soils and further studies can be prepared at the appropriate time after Gateway determination.
4.3 Flood Prone Land	It is understood that flood modeling has been undertaken in accordance with the NSW Flood Prone Land Policy, the Floodplain Development Manual 2005 and Lower Parramatta River Floodplain Risk Management Study and Plan 2005. Specifically this Direction aims to ensure that the provisions of an LEP on flood prone land are commensurate with flood hazard and includes consideration of the potential flood impacts both on and off the subject land. Furthermore, this land as it is already zoned for 120m building heights. It is considered that it will be developed without major impact on other properties. It is understood the site is slightly flood affected by the 1:100 year event. This site is an established urban property on higher land than new residential development towards the river and it is considered that appropriate studies and the determination of floor levels can be carried out after Gateway approval. The Parramatta City Flood Maps have been obtained for the site and show the extent of affectation. Flooding will be an issue which will require further examination post Gateway, as it impacts of the overall design of basement areas and possible need for mechanical water removal, which is not uncommon in the CBD. It is contended that the objectives of this Direction can be met in this instance and that flooding can be managed through design. Flooding will be assessed at the DA stage as well as pursuant to Clause 33A of the Parramatta City Centre LEP 2007.
5.2 Sydney Drinking water catchments	The planning proposal is consistent with SEPP (Sydney Drinking Water Catchment) 2011 and development will have a neutral or beneficial effect on water quality.
7.1 Implementation of the Metropolitan Plan for Sydney 2036	It is considered that the planning proposal is shown to be consistent with the NSW Government's Metropolitan Plan for Sydney 2036. This has been well demonstrated within this overall submission.

Section C – Environmental, social and economic impact.

8. Is there a 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 is within Parramatta CBD and has been previously developed. There is no threat to these issues as a result of this Planning Proposal.

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

9.1 Urban form:

Impacts such as privacy and overshadowing are critical in this context and have been well examined through the preparation of the Urban Design Study prepared by Stanistic Architects.

Most impact from these issues is within the site itself given its size and orientation. The overall orientation of units within the proposed development is driven by compliance with SEPP 65 considerations. Most overshadowing occurs in the direction of the intersection of Charles and Macquarie Streets and shadows from tall buildings stretch a considerable distance. This is part of city living but the slender building means it will be narrow. The width of Charles Street provides appropriate separation to residential units on the eastern side of the road. The western elevation of the proposed building is identified as significant by the Urban Design Report. This is likely to be free of living areas and balconies which will also ensure any future development to the west has appropriate privacy. The western elevation is intended to be enlivened given it may be visible for many years, depending on the timing of other projects. Council's Design Excellent provisions will prevail over the final form of any building on the site.

The recommendations and findings of the Urban Design Study for this site by Stanistic Architects should be read in conjunction with this proposal.

In summary the proposed building form has given careful regard to its context and the presence of existing (and future) buildings around the site. The form and resulting floor layouts will underpin the future design of this site.

9.2 Traffic:

Traffic has been the subject of much study within Parramatta CBD and is considered to be manageable in this context, albeit there will be the need to examine this matter carefully. The key issues will be around likely flows to local intersections, turning patterns onto Charles Street, crossing widths and locations and the overall design of upper level parking areas in terms of 'sleeving'. It is however considered that this can be considered post Gateway determination.

The site is also within 400m walking distance to the railway station, ferry and the bus stops on Charles Street.

The building form proposed in the Urban Design Report for the site would likely result in about 260-290 units, excluding commercial floor space. It would not be unreasonable to allow for peak hour trip rates of 2 trips per 100sqm commercial GFA, 4.6 trips per 100m² of retail GFA and 0.24 trips per unit in a high density residential environment. Indeed, more recent RTA surveys are finding trip rates of 0.19 per unit in peak hour for high density units near transport.

In very approximate terms this would result in a total of somewhere around 100 trips in the inbound and outbound peak hours. A more comprehensive study of this issue can be carried out as part of the Part 4 Development Application process. Traffic is considered to be manageable in this context.

9.3 Soil and Water:

The basement parking design will need to have regard to the presence of Acid Suphate Soils and groundwater. It is considered that these issues can be managed after Gateway determination or at the DA stage if required.

9.4 Heritage:

The impact of the proposal on the nearby Heritage items within the Arthur Philips School site will need to be carefully considered. It is considered that this is more an issue for the development of the school site however appropriate regard must be had during the DA process.

9.5 Flooding:

This matter is discussed in reference to 117 Direction 4.3 however it is considered that the impact of any 1:100 year even can be readily managed through appropriate design. This is currently being done in Parramatta CBD at present on sites closer to the River than this property.

10. How has the planning proposal adequately addressed any social and economic effects?

10.1 Economic & Social Assessment

This Planning Proposal includes with it an economic report to examine the site itself and the impact, if any, of the loss of employments lands within the region.

It is contended that no significant negative economic impacts will arise from this Planning Proposal in addition to those considered by Council in the original building height allocations. This is how a developing city evolves.

The commercial study of the site indicates that the site is of minor significance and therefore appropriate for a mixed use development with residential units. In a positive sense it does note the following benefits:

- Construction will generate 251 jobs years directly in construction and a total of 922 job years through production and consumption induced multiplier impacts; and
- The building will provide 115 permanent jobs on site which is around 50 jobs more than would be provided assuming both existing buildings were occupied.

This proposal supports the overall vision to see Parramatta CBD thrive and grow as a vital centre. This Planning Proposal does not oppose any of these objectives and will impact positively in this regard. In detailed terms this Planning Proposal has the potential to provide assistance with upgrade works at Robin Thomas Reserve and also along the River Reserve. It should also likely result in the ability to provide streetscape works in the vicinity. This will be achieved via the Voluntary Planning Agreement for the site.

It is also contended that vital, vibrant Regional Centres have people living in them. This is a tremendous way of stimulating local businesses, encouraging passive surveillance after business hours and creating places which attract tourists.

10.2 Intended Design Excellence Outcomes:

Design excellence outcomes are sought after for this project, however the proponent wishes to achieve them through a collaborative design process rather than a competition.

Clause 22D(4) of Parramatta City Centre LEP 2007 includes a requirement for a Design Competition. Subclause (5) however goes on to say:

(5) "Subclause (4) does not apply if the Director-General certifies in writing that the development is one for which an architectural design competition is not required"

Design Excellence Guidelines are also contained within Draft Parramatta Development Control Plan 2011 - Addition of Parramatta City Centre Provisions (Section 4.3.3.8). The same controls are also reflected within draft amendments to Parramatta LEP 2011. Council's controls focus on an architectural design competition process as the means to design excellence being achieved.

The Director General has the right under the current LEP to waive the right for a competition. An application to have the competition waived is made as part of this Planning Proposal and a report in support of this has been given to Council and the Director General.

It must be noted that it is not intended to avoid design excellence. This alternate strategy suggests there is a better way to achieve design excellence through a collaborative approach involving high quality architects. Indeed the desire for a quality building on this site is confirmed by both owner and key stakeholders.

The Director General's Design Excellence Guidelines which make provisions for an 'exceptions clause' which allows design excellence to be achieved via a Design Integrity Panel (DIP) subject to Director General's approval.

The Director General's Design Excellence Guidelines are critical to observe at this point. It states that:

An architectural design competition is required where;

- A building is over a particular height specified in the LEP,*
- The building is on a specified key site,*
- The competition is required as a condition of a Part 3A approval; or*
- The landowner (or their agent) elects to have a competition.*

It is the *path* to achieve design excellence that must be clearly resolved. The strategy proposed to achieve design excellence in this instance is informed by the Director General's Guidelines relating to the 'Exceptions Clause' to the Design Competition process:

Exceptions Clause:

The requirement for a minimum of three architectural / design firms to submit designs may be waived by the Director-General where it can be demonstrated design excellence will be achieved, such as where concept drawings are submitted for a manifestly outstanding building, and the architect has a reputation for delivering buildings of the highest quality. In such a case, a design integrity panel may be appointed to oversee implementation.

In this case, a comprehensive Urban Design Report has been completed by Stanisc and Associates (Appendix 1). This includes a comprehensive review of buildings within Parramatta City Centre and preparation of appropriate built form controls for the subject site. Stanisc and Associates' experience with significant buildings, design excellence processes and government design review panels is considered significant in this context and Frank Stanisc is recognized by the Department of Planning and Infrastructure.

The proposed building for this site is therefore contended to be a "*manifestly outstanding building*" on this site and the architect is offered as one who "*has a reputation for delivering buildings of the highest quality.*"

The strategy requested in this Planning Proposal and the “*Strategies to achieve Design Excellence in accordance with the Director General’s Guidelines*” therefore seeks an exception to the need for a formal Design Competition and requests an endorsement of Stanisc and Associates to prepare any future DA drawings under the oversight of a Design Integrity Panel (or jury) as set out in the Director General’s Guidelines.

It is important to note that the collaborative approach resulting from this approach may indeed be shown to be a better approach than a Design Competition which has designers working in isolation during the entire process. The proposed approach has a high level architect working with superior panel members collaboratively. This involves an ongoing peer review of the design at every stage which is much more likely to achieve design excellence. Council can be comfortable with this approach and its ability to result in a quality building. This DIP will comprise experienced and well-respected experts with high-level skills and experience in the field of architecture to review the work of an Architect who has a demonstrated record of achieving design excellence.

This strategy has been thoroughly detailed in the document lodged with Council and the Department of Planning & Infrastructure entitled: “*Strategies to achieve Design Excellence in accordance with the Director General’s Guidelines*” prepared by Statewide Planning outlines fully the merits of this approach and should be read in conjunction with this Planning Proposal.

The nominees for the DIP are:

- Peter Poulet, NSW Government Architect representing the Department of Planning and Infrastructure;
- Katie Westlake, Architect and Landscape Architect, Manager Urban Design at Parramatta Council;
- Tony Caro, Architect/ Urban Designer and Parramatta Design Review Panelist; and
- Matthew Daniel, Development Director at Statewide Planning

A senior planning officer of Council, selected by the Mayor, will be an observer to the process and report to Council.

10.3 Voluntary Planning Agreement

A Voluntary Planning Agreement (VPA) is likely to be appropriate for the subject site. Negotiations in this regard may involve:

1. Works in kind public domain improvements to Charles and Macquarie streets.
2. Provision of an affordable housing unit to Council or related community housing provider.
3. Monetary contribution to assist with proposed works to the Robin Thomas Reserve Masterplan.

Section D – State and Commonwealth interests.

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

Parramatta City Centre is identified under the Sydney Metropolitan Plan as a Regional Centre. Council’s itself in a recent Planning Proposal for the overall CBD are noted Parramatta as having “*a high level of civil and utility infrastructure to service the existing and proposed uses and growth of the City.*”

The site is well located to major transport nodes and addition population in the CBD will only consolidate such infrastructure and make it more effective.

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

Consultation with appropriate departments will take place at the appropriate time.

To date consultation with the Department of Planning and Infrastructure and Council has taken place at this stage.

Council has undertaken a strategic review of its key statutory and development controls which are now in draft form. In addition, at a meeting of 26 August 2013, Council resolved that:

“the applicant’s preliminary concept to rezone land from B3 (Core Commercial) to B4 (Mixed Use) is supported and that the applicant be invited to proceed with a detailed planning proposal for the site.”

PART 4 – COMMUNITY CONSULTATION

Public consultation will take place in accordance with the Gateway Determination made by the Minister for Planning in accordance with Section 56 & 57 of the Environmental Planning and Assessment Act 1979. The planning proposal will be made publicly available for a minimum of 28 days.

Community consultation is expected to include a notice in the local newspaper and on Council's web site as well as written notice to land owners in the vicinity of the site and key stakeholders.

It is understood Council will be likely to consult with the following public authorities:

- Transport for NSW,
- Office of Water,
- NSW Department of Health,
- Office of Environment and Heritage,
- NSW Roads and Maritime Services,
- Relevant Utility Authorities,
- any other authorities directed via Gateway Determination