

Church Street, Parramatta

Independent Review of Proposed Planning Controls

Report prepared for NSW Department of Environment and Planning

September 2018



Report Register



The following report register documents the development and issue of the report entitled Church Street, Parramatta—Independent Review of Proposed Planning Controls, undertaken by GML Heritage Pty Ltd in accordance with its quality management system.

Job No.	Issue No.	Notes/Description	Issue Date
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The report has been reviewed and approved for issue in accordance with the GML quality assurance policy and procedures.

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1.0 Introduction

1.1 Background

GML Heritage Pty Ltd (GML) has been commissioned by the NSW Department of Planning and Environment (the Department) to undertake an independent heritage review of proposed Planning Controls for the Parramatta CBD that apply to the part of Church Street, Parramatta, between the Parramatta River and Macquarie Street, and to consider the heritage impact of three site specific Planning Proposals within the study area. The land that is the subject of the Planning Proposals contains numerous heritage items of local significance and three state heritage listed items in the immediate vicinity.

The Parramatta CBD Planning Proposal (CBD PP) was supported by the Heritage Study prepared by Urbis, which requested that the Department consider the appropriateness of existing height and setback controls along Church Street. The Parramatta Development Control Plan 2011 (PDCP 2011) sets out a 18m front setback requirement for any built form that extends past three storeys or 12m in height. These controls are to protect the distinctive character of the streets within the historic Parramatta CBD.

Since the submission of the CBD PP with the Department for Gateway determination, a number of site specific planning proposals have been submitted for properties within the study area. A number of these have sought a variation to the 18m Church Street upper level tower setback control with varying levels of endorsement—10m for 295 Church Street via a Gateway Determination; 12m for 197–207 Church Street and 89 Marsden Street via a Design Competition Brief; and 10m for 230–300 Church Street, which is currently under consideration.

The City of Parramatta Council considers that these variations highlight that it is not feasible to retain the controls in the CBD PP that limit the height of building to 12m for the first 18m of the site and achieve an FSR of 10:1, and that the CBD PP setback controls should be relaxed. The Department has requested guidance on these site specific PPs.

The site specific Planning Proposals reviewed in this report are:

- 295 Church Street, Parramatta (10m setback requested and approved at Gateway);
- 197 and 207 Church Street and 89 Marsden Street, Parramatta (12m setback requested); and
- 48 Macquarie Street and 220–230 Church Street, Parramatta; and
- 286–300 Church Street, Parramatta (10m setback requested).

This report reviews the Heritage Study prepared by Urbis and documentation associated with the relevant Planning Proposals. It identifies setback and podium height controls for future development along Church Street, to ensure the appropriate management of the heritage impacts of development.

1.2 Identification of Study Area

The study area is a large contiguous area of land, situated near the Parramatta River and in close proximity to Parramatta Railway Station. The study area is located on the southern side of Parramatta River and is bound by Macquarie Street. The location of the study area is shown on Figure 1.1.

Development on the site is currently characterised by two to three storey commercial tenancies and hospitality outlets. Larger scale residential development is located to the north of the study area, next to Parramatta River.

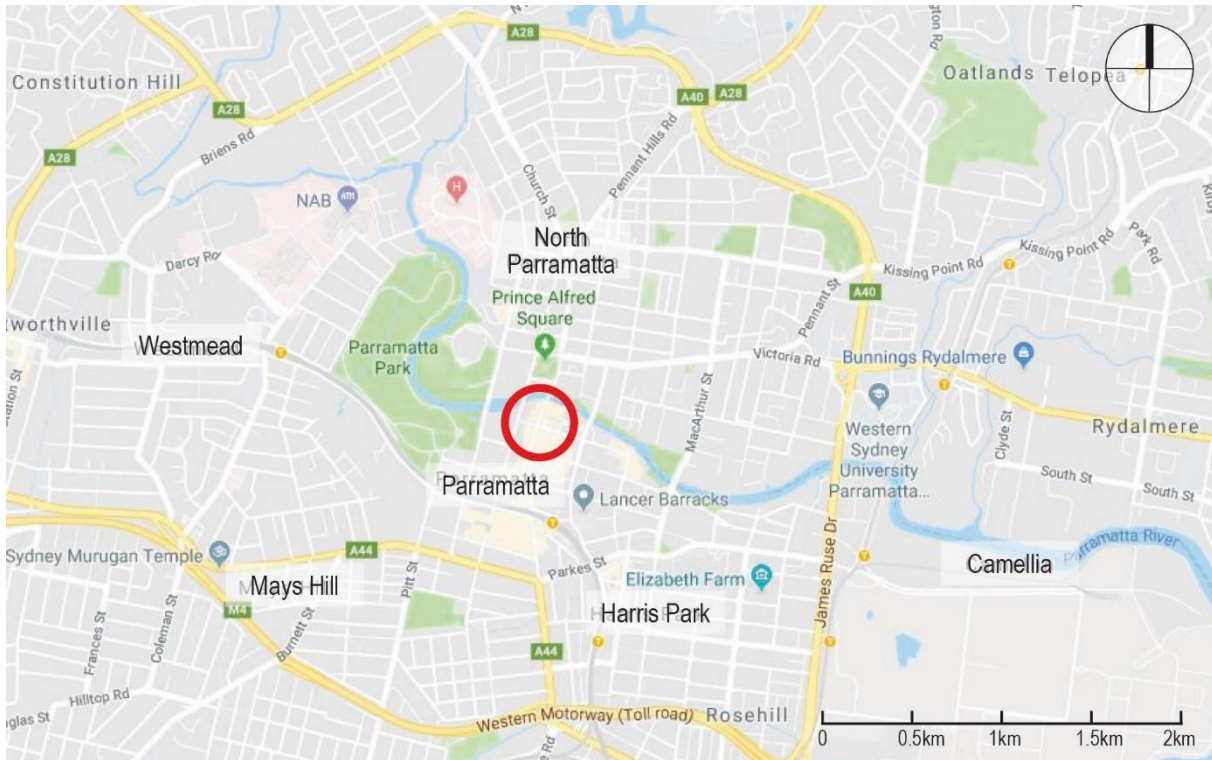


Figure 1.1 Location of the study area. (Source: Google Maps with GML overlay)

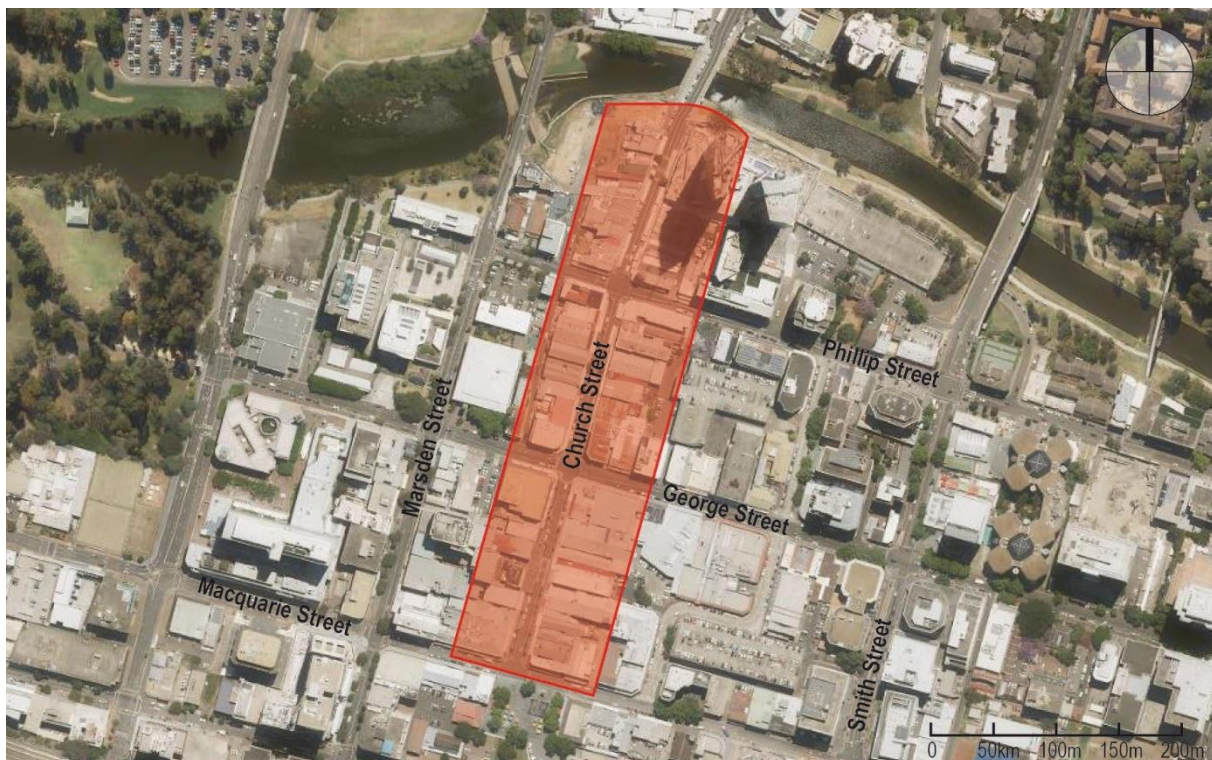


Figure 1.2 Boundary of the study area along Church Street, outlined in red. (Source: SIX Maps with GML overlay)

1.3 Statutory Context

The site is located within the Parramatta Local Government Area (LGA). The *Parramatta Local Environmental Plan 2011* (PLEP 2011) is the principal environmental planning instrument applying to the lands. Schedule 5 of the PLEP 2011 identifies heritage items and heritage conservation areas. Refer to Section 2.1 for the list of identified heritage items within the study area and in the vicinity.

Clause 5.10 of the PLEP 2011 provides for the assessment of heritage impacts of proposed developments on heritage items, within conservation areas and in the vicinity of heritage items and conservation areas.

The PDGP 2011 Section 4.3.3 provides development controls for the Parramatta City Centre. The development controls therefore apply to this study area.

1.4 Methodology and Terminology

This report has been prepared with regard to the guideline document *Statements of Heritage Impact* by the NSW Heritage Council. This report is also consistent with the relevant principles and guidelines of the *Australia ICOMOS Burra Charter, 2013* (the Burra Charter). The terminology used in this report is consistent with the terminology used in the Burra Charter.

Inspections of the study area were undertaken on 20 and 27 June 2018 by Lisa Trueman, David Logan, Claire Nunez and Annabelle Tanuwidjojo of GML.

1.5 Background Documents

The following documents have been reviewed in the preparation of this report:

- Parramatta CBD Planning Proposal, prepared by Parramatta City Council, December 2015;
- Heritage Study—CBD Planning Controls, prepared by Urbis, December 2015;
- Planning Proposal, 295 Church Street, Parramatta, prepared by Mecone, May 2015;
- Heritage Impact Statement, 295 Church Street, Parramatta, prepared by City Plan Services, September 2014;
- Planning Proposal, 197 and 207 Church Street and 89 Marsden Street, Parramatta, prepared by Holdmark Property Group, December 2015;
- Statement of Heritage Impact, 197 Church Street, Parramatta, prepared by Rappoport Heritage Consultants, March 2015;
- Planning Proposal, 48 Macquarie Street and 220–230 Church Street, Parramatta, prepared by JBA Planning, April 2015; and
- Heritage Issues Identifications, 48 Macquarie and 220–230 Church Street, Parramatta, prepared by NBRS & Partners, April 2015.

1.6 Limitations

GML has relied on information provided by the Department of Environment and Planning. No additional historical research has been undertaken. The report is limited to the requirements of the Department's

Scope of Works. Consideration of Aboriginal and historical archaeology is outside of the brief for this project and has not been considered in this report.

1.7 Authors

This report has been prepared by Lisa Trueman, Senior Heritage Consultant, and Claire Nunez, Associate, with assistance from Annabelle Tanuwidjojo, Graduate Heritage Consultant, and specialist input from David Logan, Partner.

2.0 Site Analysis

2.1 The Study Area

The study area includes those buildings fronting Church Street, Parramatta, between the Parramatta River (Lennox Bridge) and Macquarie Street. This section of Church Street contains a large number of heritage items that together demonstrate the early urban and commercial developments of the Parramatta area. Church Street, formerly known as Quakers Row, was a key axis of the original planned town layout from the colonial era.

The heritage items within the study area generally date from the late nineteenth and early twentieth century and demonstrate a variety of architectural styles including Victorian, Federation and Inter-War styles. They contribute to a predominantly two to three storey commercial streetscape that has retained its historic character and makes a strong contribution to the heritage character of the wider Parramatta town centre.

Many of the heritage items in the study area retain their original form and detail above awning level. Others have been altered to varying degrees. Those buildings along Church Street that are not heritage listed are either buildings that have been heavily modified, to the extent that they have lost their historic character and fabric completely, or are contemporary buildings that have replaced the original buildings. These buildings generally detract from the historic character of the streetscape.

The heritage items within the study area are indicated on Figure 2.1 and described in Table 2.1. They are further detailed in Section 2.2.

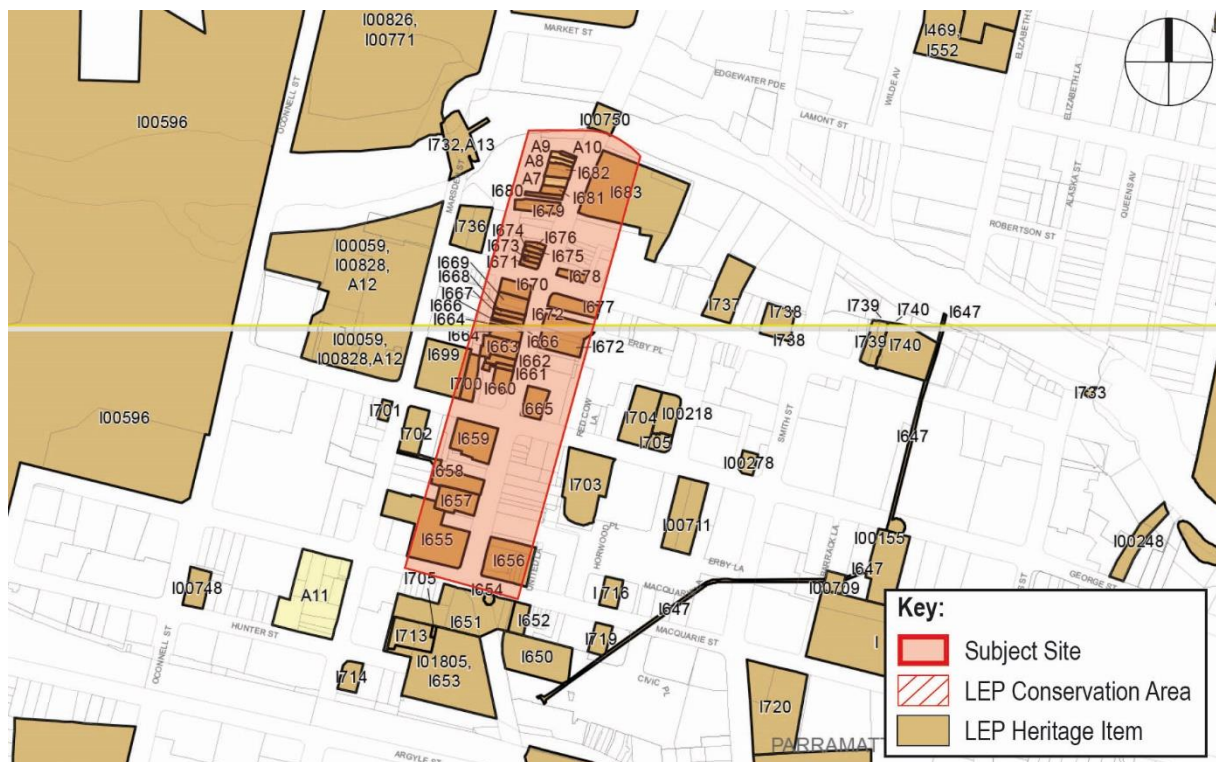


Figure 2.1 PLEP 2011 heritage map with study area outlined in red. (Source: *Parramatta Local Environmental Plan 2011* with GML overlay)

Table 2.1 Church Street, Parramatta—Listings Table.




Name	Address	Significance	Listing	Item ID
Former David Jones Department Store	330 Church Street, Parramatta	Local	PLEP2011	I683
Shop	325 and 327 Church Street, Parramatta	Local	PLEP2011	I682
Shop	321 Church Street, Parramatta	Local	PLEP2011	I681
Shop	317 Church Street, Parramatta	Local	PLEP2011	I680
Shop	311–315 Church Street, Parramatta	Local	PLEP2011	I679
Former ANZ Bank (and potential archaeological site)	306 Church Street, Parramatta	Local	PLEP2011	I678
Shop (and potential archaeological site)	302 Church Street, Parramatta	Local	PLEP2011	I677
Shop	293 Church Street, Parramatta	Local	PLEP2011	I676
Shop	291 Church Street, Parramatta	Local	PLEP2011	I675
Shop	289 Church Street, Parramatta	Local	PLEP2011	I674
Shop	287 Church Street, Parramatta	Local	PLEP2011	I673
Sandstone and brick wall	286 (rear), 288 and 290 Church Street, Parramatta	Local	PLEP2011	I672
Shop	281 Church Street, Parramatta	Local	PLEP2011	I671
Shop, office (and potential archaeological site)	279 Church Street, Parramatta	Local	PLEP2011	I670
Shops (and potential archaeological site)	275 and 277 Church Street, Parramatta	Local	PLEP2011	I669
Shop (and potential archaeological site)	273 Church Street, Parramatta	Local	PLEP2011	I668
Shop (and potential archaeological site)	269 Church Street, Parramatta	Local	PLEP2011	I667
Shop (and potential archaeological site)	267 Church Street, Parramatta	Local	PLEP2011	I666
Westpac Bank	264 Church Street, Parramatta	Local	PLEP2011	I665
Shops and offices	263–265 Church Street, Parramatta	Local	PLEP2011	I664
Shops (and potential archaeological site)	257, 259 and 261 Church Street, Parramatta	Local	PLEP2011	I663
Shop	255 Church Street, Parramatta	Local	PLEP2011	I662
Shop	253 Church Street, Parramatta	Local	PLEP2011	I661

Name	Address	Significance	Listing	Item ID
Parramatta House (and potential archaeological site)	243 Church Street, Parramatta	Local	PLEP2011	I660
Former Courthouse wall and sandstone cellblock (and potential archaeological site)	223 and 235 Church Street, Parramatta	Local	PLEP2011	I659
HMV (former Commonwealth Bank) (and potential archaeological site)	215 Church Street, Parramatta	Local	PLEP2011	I658
Telstra House (former post office) (and potential archaeological site)	213 Church Street, Parramatta	Local	PLEP2011	I657
Horse parapet façade (and potential archaeological site)	198–216 Church Street and 38–46 Macquarie Street, Parramatta	Local	PLEP2011	I656
Shop (and potential archaeological site)	197 Church Street, Parramatta	Local	PLEP2011	I655
Archaeological Sites in the Study Area				
Archaeological and terrestrial	323 Church Street, Parramatta	Local	PLEP2011	A7
Archaeological and terrestrial	329 Church Street, Parramatta	Local	PLEP2011	A8
Archaeological and terrestrial	331 Church Street, Parramatta	Local	PLEP2011	A9
Archaeological and terrestrial	331A Church Street, Parramatta	Local	PLEP2011	A10
Heritage Items in the Vicinity				
Lennox Bridge	Adjacent to 339, 340 and 351 Church Street, Parramatta	State	State Heritage Register PLEP2011 Roads and Maritime Section 170 Register	I00750
Parramatta Dam archaeological site weir	Marsden Street, Parramatta	Local	PLEP2011	I732
Former St Andrew's Uniting Church, hall (and potential archaeological site)	2 Phillip Street (corner of Marsden Street), Parramatta	Local	PLEP2011	I736
Parramatta Hospital archaeological site	22A O'Connell Street, Parramatta	Local	PLEP2011	A12
Brislington property, Moreton Bay fig tree (and potential archaeological site)	164 Marsden Street, Parramatta	State	State Heritage Register PLEP2011 NSW Department of Health Section 170 Register	I00059 I00828


GML Heritage


Name	Address	Significance	Listing	Item ID
Court House Tower	12 George Street, Parramatta	Local	PLEP2011	I699
Former Rural Bank	16 George Street, Parramatta	Local	PLEP2011	I700
Marsdens Building (and potential archaeological site)	17 George Street, Parramatta	Local	PLEP2011	I701
Woolpack Hotel (and potential archaeological site)	19 George Street, Parramatta	Local	PLEP2011	I702
Shops (and potential archaeological site)	41–59 George Street, Parramatta	Local	PLEP2011	I703
Civic Arcade (former theatre) (and potential archaeological site)	48 George Street, Parramatta	Local	PLEP2011	I704
Dr Pringle's Cottage	52 George Street, Parramatta	Local	PLEP2011	I705
Redcoats' Mess House (and potential archaeological site)	2 Horwood Place, Parramatta	State	State Heritage Register	I00218
Kia Ora (and potential archaeological site)	62–64 Macquarie Street, Parramatta	Local	PLEP2011	I716
Leigh Memorial Uniting Church	119 Macquarie Street, Parramatta	Local	PLEP2011	I719
Parramatta Town Hall (and potential archaeological site)	182 Church Street, Parramatta	Local	PLEP2011	I650
Murrays' Building (and potential archaeological site)	188 Church Street, Parramatta	Local	PLEP2011	I652
Bicentennial Square and adjoining buildings	188, 188R (part of Church Street road reserve) and 195A Church Street, 38 Hunter Street and 83 Macquarie Street, Parramatta	Local	PLEP2011	I651
Centennial Memorial Clock	Bicentennial Square (opposite 196 Church Street), Parramatta	Local	PLEP2011	I654
Warden's cottage (verger's cottage)	195 Church Street (adjacent to 45 Hunter Street), Parramatta	Local	PLEP2011	I653
St John's Anglican Cathedral	195 Church Street, Parramatta	State	State Heritage Register	I01805
St John's Parish Hall	195 Church Street, Parramatta	Local	PLEP2011	I713
Two-storey residence	41 Hunter Street, Parramatta	Local	PLEP2011	I714
Archaeological site	134–140 Marsden Street, Parramatta	Local	PLEP2011	A11




2.2 Site Photographs

Address	Statement of Significance	Photograph
330 Church Street, Parramatta	<p><i>Building at 330 Church Street, built c. 1960, is of significance for the Parramatta area for historical reasons. This Inter war department store building is one of the first examples of joint private enterprise and local government activities in 1960s.</i></p> <p>The former department store building was demolished in 2013, and the multi-storey 'Altitude' Development constructed on the site. However, the site remains listed as a heritage item within the LEP.</p>	 <p>(Source: GML 2018)</p>
325 and 327 Church Street, Parramatta	<p><i>Building at 325–327 Church Street is of significance for the Parramatta area for historical reasons, and as a representative example of a turn-of-the-20 Century shop in the local area. The item is notable in the streetscape, having a high degree of integrity above the awning line.</i></p>	 <p>(Source: GML 2018)</p>
317–321 Church Street, Parramatta (Two listings on the same lot)	<p><i>Shop at 321 Church Street is of significance for the Parramatta area for historical reasons as an early shop in Church Street. The building continues to contribute to the streetscape in spite of alterations, particularly through its above-awning facade.</i></p> <p><i>Shop at 317 Church Street is of significance for the Parramatta area for historical reasons as an early shop in Church Street. The building continues to contribute to the streetscape in spite of alterations, particularly through its above-awning facade.</i></p>	 <p>(Source: GML 2018)</p>
311–315 Church Street, Parramatta	<p><i>Building at 311 Church Street is of significance for the Parramatta area for historical and aesthetic reasons and as a representative example of an Interwar shops and residence building in the area. Built c. 1930s, it is readily identifiable as part of historical building stock and strongly contributes to the streetscape.</i></p>	 <p>(Source: GML 2018)</p>




Address	Statement of Significance	Photograph
306 Church Street, Parramatta	<i>Building at 306 Church Street is of significance for Parramatta area for historical and aesthetic reasons and as representative example of a Victorian Free Classical style building in the area. This building makes a major contribution to the streetscape in Church Street and it is a notable example of the commercial significance of Parramatta in the late nineteenth century. The site possesses potential to contribute to an understanding of early urban development in Parramatta.</i>	 <p>(Source: GML 2018)</p>
302 Church Street, Parramatta	<i>Building at 302 Church Street is of significance for the Parramatta area for historical reasons as an early three storey sandstone building along Church Street. Built c. 1850, this building is potentially a rare survivor of a mid 19th century sandstone facade covered by the present street facade. It is also associated with the southern neighbouring property as an integral part of an unusually high 19th century development on both properties. This site has archaeological potential from the earliest phase of Parramatta's development through the 19th century and early 20th century.</i>	 <p>(Source: GML 2018)</p>
289–293 Church Street, Parramatta (Two listings on the same lot)	<p><i>Shop at 293 Church Street is of significance for the Parramatta area for historical and aesthetic reasons, as an early (Federation period) shop in Church Street. The building contributes to the streetscape as part of the set at Nos. 287–293 due to the interesting facade design, albeit the façades were all intrusively repainted.</i></p> <p><i>Shop at 289 Church Street is of significance for the Parramatta area for historical and aesthetic reasons, as an early (Federation period) shop in Church Street. The building contributes to the streetscape as part of the set at Nos. 287–293 due to the interesting facade design, albeit the façades were all intrusively repainted.</i></p>	 <p>(Source: GML 2018)</p>
291 Church Street, Parramatta	<i>Shop at 291 Church Street is of significance for the Parramatta area for historical and aesthetic reasons, as an early (Federation period) shop in Church Street. The building contributes to the streetscape as part of the set at Nos. 287–293 due to the interesting facade design, albeit the façades were all intrusively repainted.</i>	 <p>(Source: GML 2018)</p>

Address	Statement of Significance	Photograph
287 Church Street, Parramatta	<i>Shop at 287 Church Street is of significance for the Parramatta area for historical and aesthetic reasons, as an early (Federation period) shop in Church Street. The building contributes to the streetscape as part of the set at Nos. 287–293 due to the interesting facade design, albeit the façades were all intrusively repainted.</i>	 <p>(Source: GML 2018)</p>
286 (rear), 288 and 290 Church Street, Parramatta	<i>Stone walls at rear of 286, 288 and 290 Church Street are of significance for the local area for historical and scientific reasons, as they can demonstrate the earlier development on the site and have the potential to contribute to a further understanding of the early urban development in Parramatta.</i>	 <p>(Source: GML 2018)</p>
281 Church Street, Parramatta	<i>Shop at 281 Church Street is of significance for the Parramatta area for historical and aesthetic reasons, as an early (Federation period) shop in Church Street. The building continues to contribute to the streetscape in spite of alterations, additionally enhanced by its corner position.</i>	 <p>(Source: GML 2018)</p>
279 Church Street, Parramatta	<i>Building at 279 Church Street is of significance for Parramatta area for historical reasons as a substantial 1930s development reflecting the consolidation of Parramatta as a business centre and the introduction of newer and fashionable architectural styles. The site is also strongly associated with the Murray empire along Church Street and is likely to contain archaeology from that period. The building has aesthetic significance for its design as a prominent Inter War building occupying a corner position.</i>	 <p>(Source: GML 2018)</p>

Address	Statement of Significance	Photograph
275 and 277 Church Street, Parramatta	<i>Shops at 275 and 277 Church Street, built c. 1860, are of significance for the Parramatta area for historical reasons, and as part of a group at Nos. 267–277, owned and developed by methodist entrepreneur WR Murray and his brother in conjunction with their major store at Nos. 263–265 Church Street. The pair of shops at Nos. 275 and 277 is a related place (in heritage terms) to a number of buildings associated with Murray Bros in Church Street. This item has technical/research significance because it has archaeological potential and is believed to contain remnant fabric and from the earliest phase of Parramatta's development, through the 19th and early 20th centuries.</i>	 <p>(Source: GML 2018)</p>
267–273 Church Street, Parramatta (Three listings on the same lot)	<i>Building at 273 Church Street, built c. 1860, is of significance for the Parramatta area for historical reasons as part of a group at Nos. 267–277, owned and developed by methodist entrepreneur WR Murray and his brother in conjunction with their major store at Nos. 263–5. The building is a related place to a number of buildings associated with the Murray Bros in Church Street. This item has technical/research significance because it has archaeological potential and is believed to contain remnant fabric and from the earliest phase of Parramatta's development, through the 19th and early 20th centuries.</i>	 <p>(Source: GML 2018)</p>
	<i>Building at 269 Church Street, built c. 1860, is of significance for the Parramatta area for historical reasons as part of a group at Nos. 267–277, owned and developed by methodist entrepreneur WR Murray and his brother in conjunction with their major store at Nos. 263-5. The building is a related place to a number of buildings associated with the Murray Bros in Church Street. This item has technical/research significance because it has archaeological potential and is believed to contain remnant fabric and from the earliest phase of Parramatta's development, through the 19th and early 20th centuries.</i>	
	<i>Building at 267 Church Street, built c. 1860, is of significance for the Parramatta area for historical reasons as part of a group at Nos. 267–277, owned and developed by methodist entrepreneur WR Murray and his brother in conjunction with their major store at Nos. 263–5. The building is a related place to a number of buildings associated with the Murray Bros in Church Street. This item has technical/research significance because it has archaeological potential and is believed to contain remnant fabric and from the earliest phase of Parramatta's development, through the 19th and early 20th centuries.</i>	

Address	Statement of Significance	Photograph
264 Church Street, Parramatta	<i>Building at 264 Church Street is of significance for the Parramatta area for historical and aesthetic reasons and as a representative example of an Interwar Classical bank building in the area. Built c. 1938 on a prominent street corner, it is readily identifiable as part of historical building stock and strongly contributes to the streetscape.</i>	 <p>(Source: GML 2018)</p>
263–265 Church Street, Parramatta	<i>Building at 263–265 Church Street is of significance for Parramatta area for historical and aesthetic reasons and as a representative example of shops built in the Victorian Mannerist architectural style. Built c. 1860–1876, the building is readily identifiable as part of historic building stock of the area and continues to contribute strongly to the streetscape and townscape.</i>	 <p>(Source: GML 2018)</p>
257, 259 and 261 Church Street, Parramatta	<i>Shops at 257, 259 and 261 Church Street, built c. 1930, are of significance for the Parramatta area for historical and aesthetic reasons, and as a representative example of Interwar shops in the area. The item contributes to the streetscape and has the potential to provide further evidence on the earliest phase of Parramatta's development, through the 19th and early 20th centuries.</i>	 <p>(Source: GML 2018)</p>
255 Church Street, Parramatta	<i>Building at 255 Church Street, built c. 1860–1869, is of significance for Parramatta area for historical reasons as the site that could contribute to the understanding of the development of Church Street during the 19th and 20th century. The building is a representative example of a 19th century shop in the local area.</i>	 <p>(Source: GML 2018)</p>

Address	Statement of Significance	Photograph
253 Church Street, Parramatta	<i>Building at 253 Church Street, built c.1870, is of significance for the local area for historical reasons as the site that could contribute to the understanding of the development of Church Street during the 19th and 20th century.</i>	 <p>(Source: GML 2018)</p>
243 Church Street, Parramatta	<i>Shops at 243, 245 and 247 Church Street, built c. 1924, are of significance for the Parramatta area for historical and aesthetic reasons, and as a representative example of Interwar shops in the area. The item contributes to the streetscape and has the potential to provide further evidence on the earliest phase of Parramatta's development, through the 19th and early 20th centuries.</i>	 <p>(Source: GML 2018)</p>
223 and 235 Church Street, Parramatta	<i>Stone wall at rear of the buildings at 223–235 Church Street is of significance for the local area for historical and scientific reasons, as it can demonstrate the earlier development on the site and has the potential to contribute to a further understanding of the early urban development in Parramatta.</i>	 <p>(Source: GML 2018)</p>
215 Church Street, Parramatta	<i>Building at 215–217 Church Street, built c. 1927, is of significance for Parramatta area for historical and aesthetical reasons and as a representative example of Inter-War Stripped Classical architectural style building that demonstrates the commercial role of Parramatta in the twentieth century. The site possesses potential to contribute to an understanding of early urban development in Parramatta.</i>	 <p>(Source: GML 2018)</p>

Address	Statement of Significance	Photograph
213 Church Street, Parramatta	<i>Building at 213 Church Street is of significance for the Parramatta area for historical and aesthetic reasons and as representative example of a Victorian Mannerist building and a post office in the area. Built c. 1880, it makes a major contribution to the streetscape and it is an example of the work of notable architect James Barnett.</i>	 <p>(Source: GML 2018)</p>
198–216 Church Street and 38–46 Macquarie Street, Parramatta	<i>The group collectively known as ‘Horse parapeted shops’ is of significance for the Parramatta area for historical and aesthetic reasons and as representative example of Victorian Italianate shops in the area. Built c. 1881, it makes a major contribution to the streetscape and presents a landmark in the centre of Parramatta. This group of commercial buildings makes a major presence at a major intersection and demonstrates the commercial role of Parramatta in the nineteenth century. The site possesses potential to contribute to an understanding of early urban development in Parramatta.</i>	 <p>(Source: GML 2018)</p>
197 Church Street, Parramatta	<i>Building at 197 Church Street is of significance for Parramatta area for historical and aesthetic reasons and as a representative example of Inter-War period Stripped Classical architectural style building that demonstrates the commercial role of Parramatta in the twentieth century. The building is a related place to a number of buildings associated with the Murray Bros, being a former major department store of this group. Today, it is an important element of the streetscape in Church Street, contributing strongly to the townscape. The site has potential to contribute to an understanding of early urban development of the area.</i>	 <p>(Source: GML 2018)</p>

3.0 Parramatta CBD Planning Proposal

3.1 Background to the Planning Proposal

In April 2016, the City of Parramatta Council submitted a Gateway Determination request for a Parramatta CBD Planning Proposal (Parramatta CBD PP). The Parramatta CBD PP is currently with the Department of Planning for assessment and determination of gateway approval.

The Parramatta CBD PP seeks extensive changes to the Parramatta LEP 2011 to implement Council's Parramatta CBD Planning Strategy. The Planning Strategy was based on the study prepared by Architectus and SGS Economics & Planning in 2014, which looked at future development in the Parramatta CBD. The purpose 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 reviewed the current planning framework and identified opportunities, constraints and market conditions impacting on development, and made recommendations for the planning framework for Parramatta's future development.

3.2 Urbis Heritage Study 2015

As part of the development of the Parramatta CBD PP, the City of Parramatta Council commissioned a Heritage Study of the CBD Heritage Controls undertaken by Urbis Pty Ltd in 2015. This report responded to the draft planning controls that were developed following the preparation of the Parramatta Planning Strategy.

The objectives of the Heritage Study were to ensure that:

- *Areas identified for greater density development take account of heritage considerations and any impacts can be ameliorated and effectively dealt with through heritage controls and the development assessment stage;*
- *The planning proposal contains provisions that facilitate the conservation of identified heritage so as to satisfy Section 117 Direction 2.3 heritage Conservation; and*
- *Establish a nexus between recommended heritage controls and existing heritage studies and conservation controls is established.¹*

The Urbis report noted that, in addition to the individual heritage items and historic streetscape character, Church Street is characterised by significant view corridors, to St John's Church in the south and landmark buildings to the north, including St Peter's Church spires.

The Urbis report made a series of recommendations to alter the proposed draft controls in order to avoid or reduce impacts on heritage within the CBD.

Specific recommendations relating to the Church Street Precinct were:

- Height controls of up to 12m or three storeys on a nil setback from the street should be applied.
- An 18m minimum setback from the street frontage to both the eastern and western sides of Church Street should be maintained, to ensure that the two–three storey streetscape character is retained within any redevelopment.

The Parramatta CBD PP has considered some of the recommendations made in the Urbis report, but has not adopted all of the recommendations. In particular, the 18m minimum setback has not been retained, but reduced to 12m along both sides of Church Street.

3.3 Summary of Planning Proposal

The City of Parramatta Council website notes that the purpose of the Parramatta CBD PP is to:

- *Provide for an expanded and more intense commercial core to strengthen and facilitate the role of Parramatta as a dual CBD.*
- *Support the CBD as a vibrant centre by surrounding the core with higher density mixed use.²*

Key components of the Parramatta CBD PP include:

- increased housing and employment targets;
- expansion of the CBD area boundary;
- changes to land use zoning within the CBD;
- changes to maximum height and floor space ratio;
- sliding scale planning controls to promote site amalgamations;
- additional FSR on identified Opportunity Sites;
- solar access protection to Prince Alfred Square, Jubilee Park, the Lancer Barracks site and the Parramatta River foreshore;
- Design Excellence requirement and bonuses for buildings higher than 40m; and
- heritage controls—including incentives for FSR provisions for heritage items.

In general terms, all land within the Parramatta CBD PP area will have two FSR and two height controls—a base FSR and height control and an incentive FSR and height control. Additional bonus floor space may also be achieved on some sites for Design Excellence, Opportunity Sites and high performing buildings.

The Parramatta CBD PP does not seek to amend the existing PLEP 2011 relating to heritage under Clause 5.10.

The area to which the Parramatta CBD PP applies is shown on Figure 3.1.

3.4 Parramatta CBD PP Planning Framework for the Study Area

The Parramatta CBD PP includes a number of specific controls that relate to the study area. These include:

- incentive floor space ratio of 10:1 applied across the study area;
- retention of the 12m maximum height control at the street frontage along Church Street, for a depth of 18m; and

GML Heritage

- identification of sites throughout the study area as 'Opportunity Sites' eligible for bonus floor space.

The Planning Proposal Maps that relate to the study area are included in Figures 3.2 to 3.5.

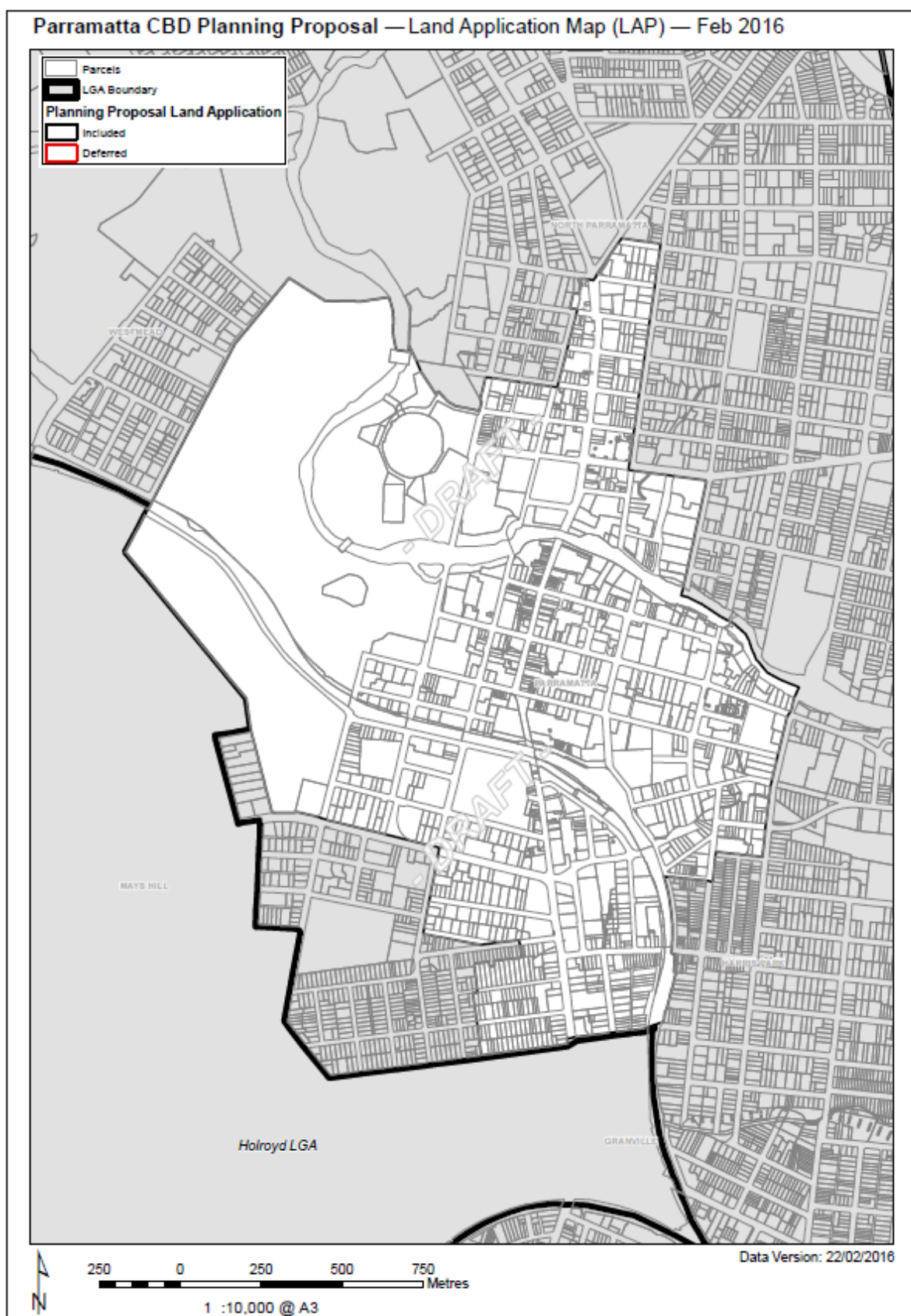


Figure 3.1 Parramatta CBD Planning Proposal Area. (Source: Parramatta CBD Planning Proposal September 2018)

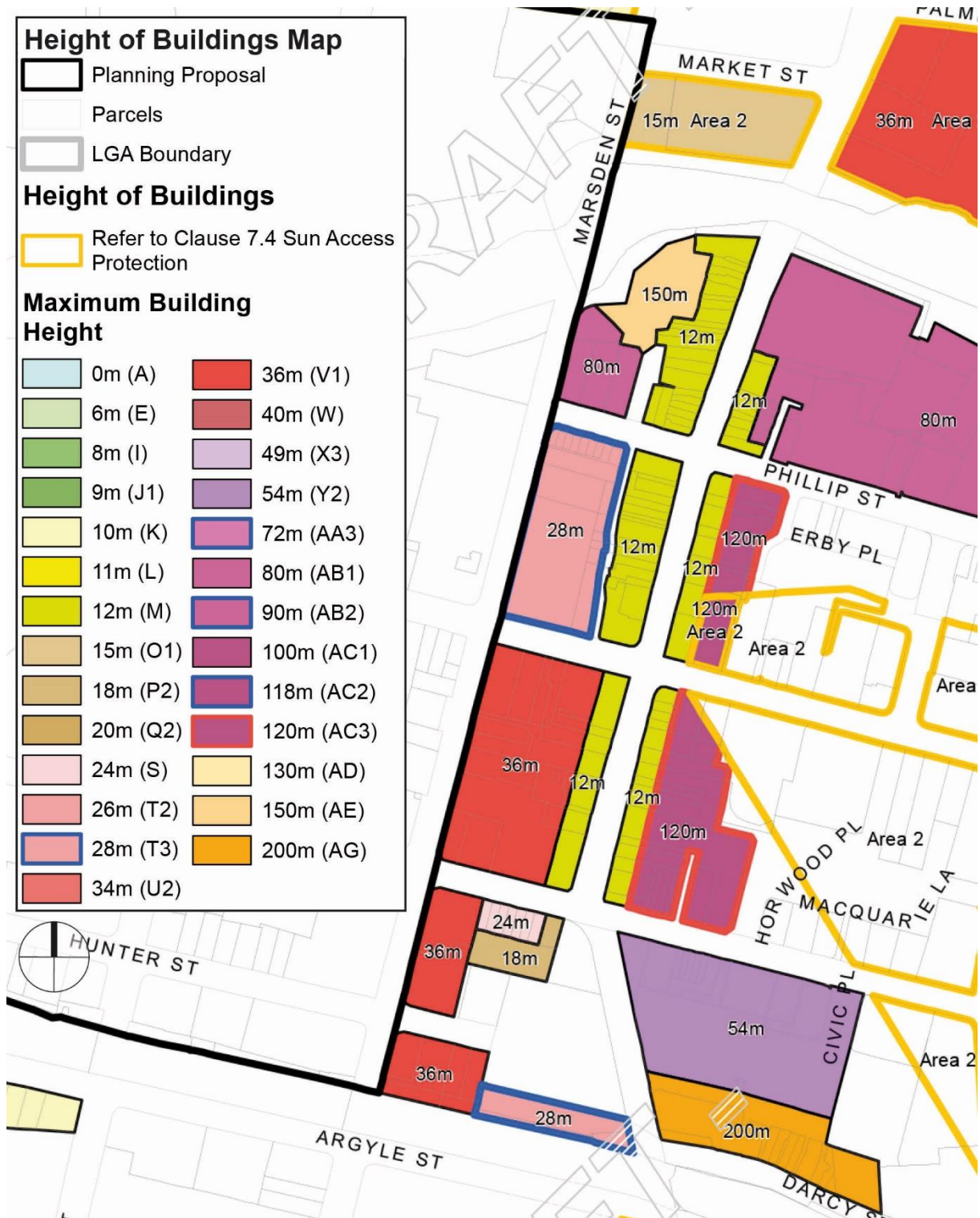


Figure 3.2 Proposed Height of Buildings Map showing the study area. (Source: Parramatta CBD Planning Proposal September 2018)

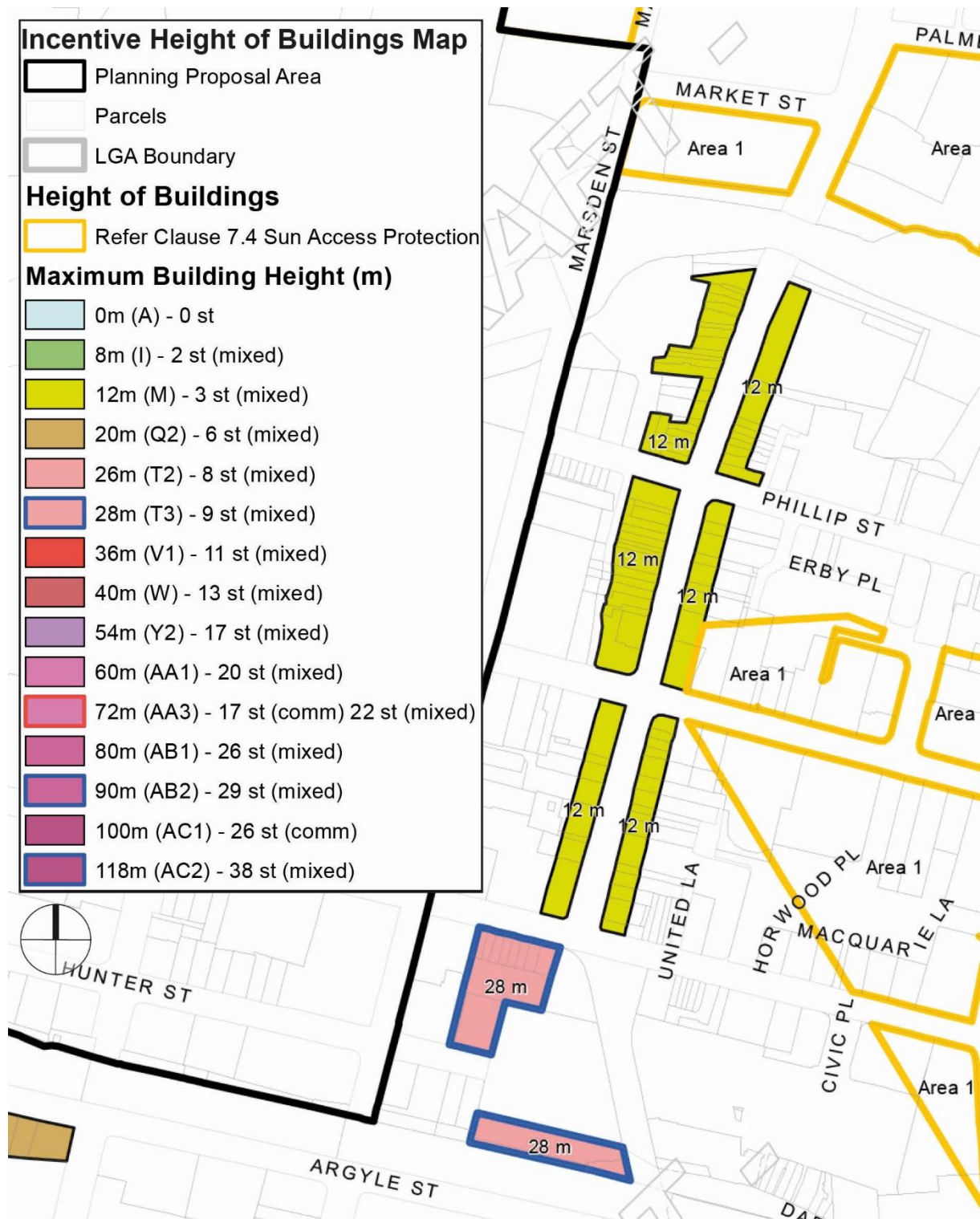


Figure 3.3 Proposed Indicative Height of Buildings Map showing the study area. (Source: Parramatta CBD Planning Proposal September 2018)

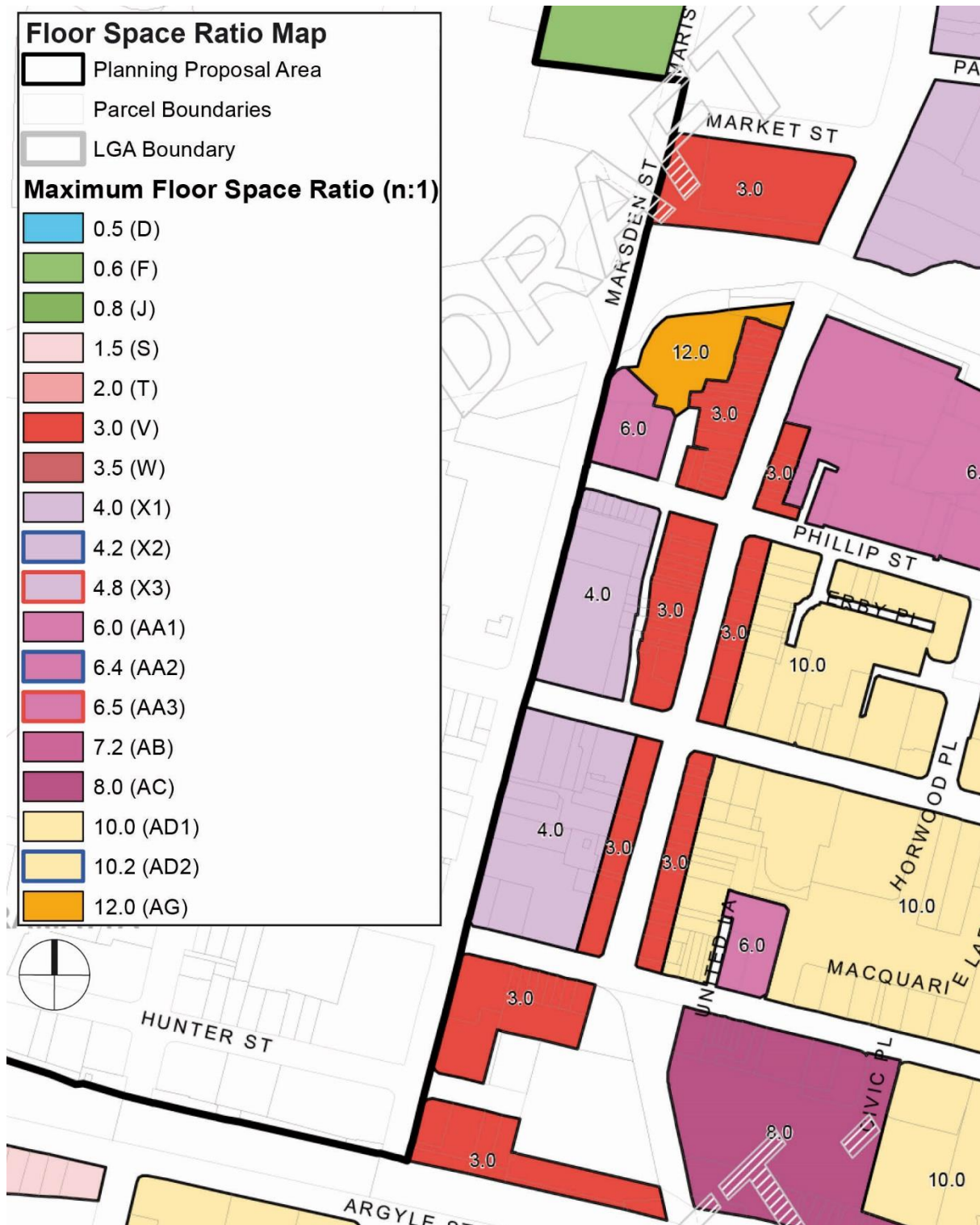


Figure 3.4 Proposed Floor Space Ratio Map showing the study area. (Source: Parramatta CBD Planning Proposal September 2018)

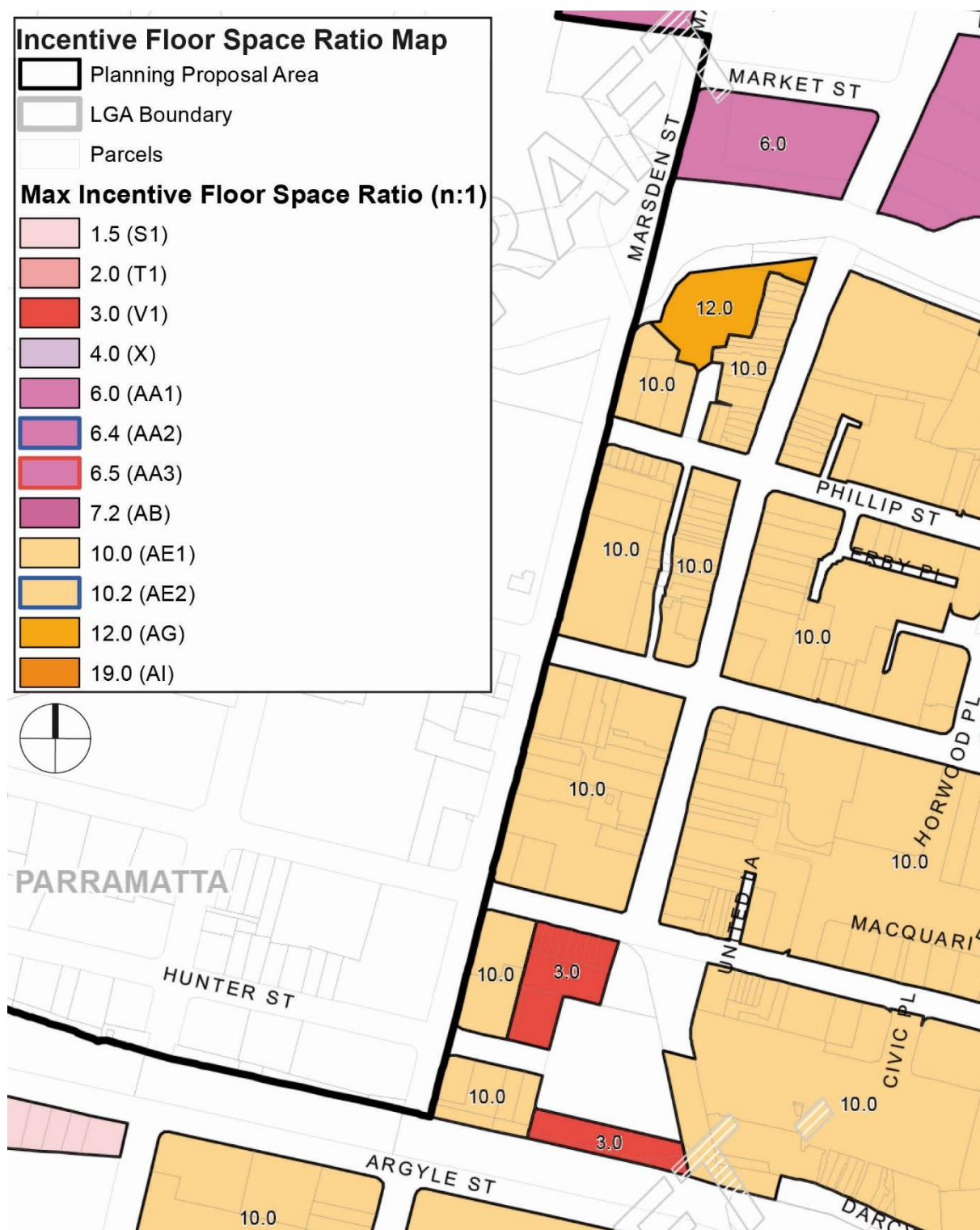


Figure 3.5 Proposed Floor Space Incentives Map showing the study area. (Source: Parramatta CBD Planning Proposal September 2018)

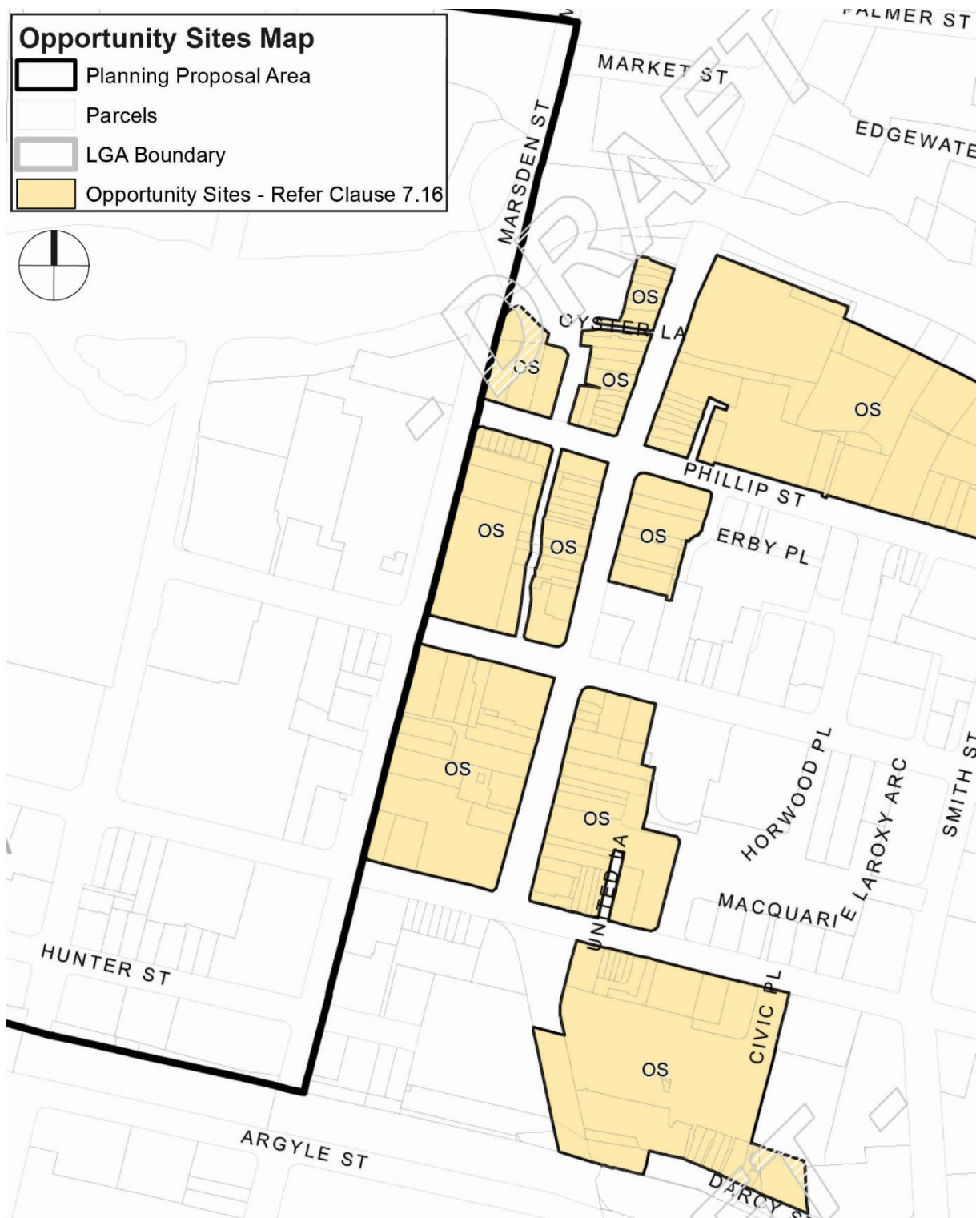


Figure 3.6 Proposed Opportunity Sites Map showing the study area. (Source: Parramatta CBD Planning Proposal September 2018)

3.5 Heritage Commentary

The Parramatta CBD PP sets an ambitious target for increasing the density of mixed use development within the broader Parramatta CBD. With this increase in development there are impacts on heritage items identified throughout the CBD area, including those heritage items within the study area.

The following general comments are made in relation to the PP controls for the study area:

1. The section of Church Street south of the river is, effectively, one of the key road and pedestrian gateways into the Parramatta CBD. It currently retains the character of a historic streetscape (notwithstanding recent development on a few sites) that reflects the history of Parramatta as Sydney's second earliest colonial city. The alignment of Church Street is highly significant as the north–south axis of the colonial government's planned township. It is one of the first planned streets in Australia.
2. It is rare to find such a collection of historic, consistently low scaled buildings retained in a major CBD gateway. This scale and character conveys the sense to those arriving into Parramatta that this is a truly historic place. This heritage value differentiates Parramatta from all other parts of Sydney. Parramatta has the potential to capitalise on this distinctiveness while also becoming a major commercial and residential city.
3. For this to be achieved, it is necessary to adequately protect and carefully manage the CBD's heritage values. New development needs to respect and enhance the quality of the streetscape and the settings of the many individually listed heritage items within it.
4. The Planning Proposal's uniform and unlimited FSR and height controls across the CBD do not appear to recognise the values of the historic streetscape of Church Street. The PP does not provide the appropriate degree of consideration of respectful heights and density of development adjacent to heritage items such as those along Church Street.
5. The Planning Proposal does not give adequate recognition of the significance of Church Street to the history of Parramatta and NSW. The predominant height of buildings along this streetscape is two storeys with some three storey buildings. An important heritage management principle is that new development should not dominate the scale of historic buildings. It is necessary to ensure that new development occurring within Church Street is no higher than adjacent historic buildings. Within this highly significant context, new tower development would only be acceptable if it did not visually intrude upon the streetscape.
6. Given the low scale of the street, any taller buildings would require very deep setbacks to mitigate their visual impact on the streetscape. This is particularly so because of the shallow sightlines due to the two–three storey scale of the buildings ie deeper setbacks are necessary to cut off views of the towers etc. In other CBD areas, the podium heights are generally much higher (usually more than 20m) which significantly reduces the visual impact of any towers set back beyond the podium. The setback requirement in this context is therefore a lot less than is required in Church Street where the podium heights are only 8–12m.
7. The previously determined 18m minimum setback enabled the scale of taller towers to be mitigated to a reasonable degree. The proposal to reduce this to 12m would result in significant additional impacts. Although the 12m (podium) height limit at the street frontage has been retained as an attempt to protect the historic character of this important precinct, the additional height and

decreased setback of development above the podium will have a significant impact on the scale and character of the streetscape.

8. The Planning Proposal does not facilitate sensitive site-specific development that would be expected in an area of historic significance.

3.6 Endnotes

¹ Parramatta Heritage Study December 2015, Urbis Pty Ltd, p 1.

² City of Parramatta Council, 'Parramatta CBD' <<https://www.cityofparramatta.nsw.gov.au/council/precinct-planning/parramatta-cbd>>.

4.0 Site-Specific Planning Proposals

4.1 Background

Since the submission of the Parramatta CBD Planning Proposal for gateway consideration by the Department, a number of site-specific Planning Proposals have also been submitted for sites within the study area. These site-specific proposals have sought variations to the height and density controls of the current PLEP 2011 and, in some cases, these are not consistent with the new controls outlined in the Parramatta CBD PP.

In consideration of these site-specific PPs, Council has endorsed potential development with a reduced setback from Church Street, and greater height than allowed within the current controls and also within the Parramatta CBD PP. A number of these PPs have sought a variation to the 18m Church Street upper level tower setback control with varying levels of endorsement: 10m for 295 Church Street via a Gateway Determination; 12m for 197–207 Church Street and 89 Marsden Street via a Design Competition Brief; and 10m for 230–300 Church Street which is currently under consideration.

City of Parramatta Council considers that these variations highlight that it is not feasible to retain the controls in the Parramatta CBD PP that limit the height of buildings to 12m for the first 18m of the site and achieve an FSR of 10:1. Therefore, it is seeking to amend the proposed Parramatta CBD PP setback controls. The Department has requested guidance on these site-specific PPs.

This section contains a brief analysis of the heritage impact of these site-specific planning proposals.

4.2 295 Church Street, Parramatta

Project Summary

The proposal seeks to increase the maximum FSR to 10:1 (plus design excellence bonus) and permit a maximum building height of 150m (other than the front 10m facing Church Street which will have a maximum building height of 12m) for land at 295 Church Street, Parramatta. This proposal will deliver 140 dwellings.

Analysis of Heritage Impact

This site is located between heritage items at 289–293 Church Street and 311–315 Church Street. The site is currently occupied by a two-storey building that is consistent in scale with those buildings.

The proposal includes a 12m-high podium with a tower above. The tower is proposed to be set back 10m from the Church Street frontage, rather than the 18m of the existing controls and proposed controls. This decreased setback, in combination with the 150m building height, allows for the construction of a tower that will have a significant impact on the historic streetscape character of Church Street. The low, two-storey scale of the heritage listed buildings in the immediate vicinity will result in the tower being highly visible from both the north and south, having a significant impact on the historic scale and character of this part of Church Street.

Recommendations

The 10m setback of the gateway approval is inconsistent with current planning controls and the recommendations in the Urbis report. This setback will result in an unacceptable level of heritage impact

on the historic character of Church Street. The tower should be required to be set back to a minimum of 18m at development application stage.

4.3 197 and 207 Church Street and 89 Marsden Street, Parramatta

Project Summary

The proposal seeks to remove the maximum height of building control from the site and increase the maximum FSR to 15:1 (excluding 15% design excellence bonus). This proposal will deliver 600 dwellings. The proposal includes partial or complete demolition of the existing building at 197 Church Street, which is listed as a heritage item. The proposal includes a tower that is set back 12m from Church Street.

Analysis of Heritage Impact

The heritage listed building at 197 Church Street has historical and aesthetic significance and is a representative example of Inter-War period Stripped Classical architectural style building that demonstrates the commercial role of Parramatta in the twentieth century. It is an important element of the streetscape in Church Street, contributing strongly to the townscape. The site, located on the corner of Church and Macquarie Streets, makes a strong contribution to an understanding of early urban development of the area.

The Planning Proposal includes options to either partially or fully demolish the listed building and construct a high tower above. The demolition of this heritage item will result in the loss of an important historic building in a prominent location, and should not be supported. The retention and conservation of the existing buildings and all remaining significant or original fabric must be included in any future development application in this site.

The reference design submitted with this Planning Proposal included a tower set 12m back from the Church Street frontage, in breach of the PLEP 2011 and CBD PP controls of 18m setback. This reduced setback will increase the visibility of the tower and the impact of the development at an important entry point to the historic Church Street.

In addition to the retention of the heritage item, any future development on this site should be guided by robust heritage advice. Should a tower be proposed, it should have a minimum 18m setback from Church Street with a form and materiality that respond to the historic context.

Recommendations

The retention and conservation of the existing buildings and all remaining significant or original fabric must be included in any future development application for this site. In addition to the retention of the heritage item, any future development on this site should be guided by robust heritage advice. Any tower on this site should have a minimum 18m setback from Church Street with a form and materiality that respond to the historic context.

4.4 48 Macquarie Street and 220–230 Church Street, Parramatta

Project Summary

The proposal seeks to increase the maximum FSR that applies to the site to 10:1 to enable a mixed use development incorporating retail and residential uses. The proposal involves the demolition of the existing buildings on the site, construction of a 12m-high lower podium, a 14m-high upper podium

stepping back 18m from Church Street, and a 184m-high tower above. This proposal will deliver 416 dwellings.

Analysis of Heritage Impact

This site is located in the immediate vicinity of a number of heritage items, including 198–216 Church Street and 38–46 Macquarie Street (known as the ‘Horse Parapeted Shops’). The listed buildings have a consistent scale of two to three storeys. The site is currently occupied by three individual buildings that are consistent in scale with the heritage items in the vicinity.

The proposal includes a stepped podium that has a 12m height at its Church Street frontage, with 14m above, stepped back 18m from Church Street, which complies with the current planning controls and recommendations of the Urbis report. The size and configuration of this site has allowed for a generous setback of the tower from Church Street, which greatly reduces its impact on the historic streetscape.

Recommendations

The increased setback of the tower greatly reduces its impact on the historic streetscape of Church Street and it is recommended that this setback be retained within a future development of the site.

4.5 286–300 Church Street, Parramatta

Project Summary

The proposal seeks to amend the PLEP 2011 to increase the maximum building height from 12m for the first 18m of the site to 12m for the first 210m to Church Street, and to remove the 120m height limit to the rear of the site, and to provide for a potential maximum FSR of 16:1. The PP will allow for approximately 324 dwellings on the site.

Analysis of Heritage Impact

The site contains two heritage items, the shop and potential archaeological site at 300 Church Street, and the sandstone and brick wall at 286 (rear), 288 and 290 Church Street. The heritage fabric is proposed to be retained in the proposal and the façade of the shop conserved. The proposal includes a reference design that has a height at the Church Street frontage that responds to the height of the listed shop at 300 Church Street.

The PP seeks to decrease the setback of the tower from Church Street from 18m to 10m and increase the height from 120m to having no height restriction. The resultant tower, if approved, would have a significant detrimental impact on the streetscape with the very tall tower located so close to the historic streetscape, altering its scale and character.

In its assessment of the proposal, Council made the following comment:

The assessment of this Planning Proposal has confirmed that it is not possible to retain the controls in the CBD PP for Church Street that limits the height of building to 12m for the first 18m of the site and achieve viable built form that complies with setback requirements for the Apartment Design Guidelines and achieves an acceptable built form outcome whilst achieving an FSR of 10:1 or greater.¹

Council resolved to allow a decreased setback of 12m for the podium. Whilst this is a better outcome, in heritage terms, than that sought by the proponent, the 12m setback would result in an increased impact on the heritage items on the site and the Church Street setback. This impact is due to its increased bulk and visibility from the street, both in immediate views and wider view corridors along Church Street.

Recommendations

The reduced setback of the tower greatly increases its impact on the historic streetscape of Church Street. It is recommended that the 18m setback be retained within the approval of this Planning Proposal and future development of the site. The future development of the site for a residential tower should look to alternative solutions for compliance with the Apartment Design Guidelines.

5.0 Heritage Guidelines and Planning Controls for Church Street

The Church Street study area incorporates a central and highly important area of the Parramatta CBD, which is a significant cultural asset for the area and more broadly for New South Wales. Church Street contains a considerable number of heritage items within the CBD of Parramatta. The concentration of heritage items in this area is indicative of the significance of the streetscape and layout of buildings in this area, as well as the importance of individual heritage items.

Generally, the approach to the planning and future development of this area within Parramatta should be treated separately to the proposed intense development elsewhere in the CBD. It is acknowledged that the skyline of Parramatta will be evolving and will provide a new backdrop for the Church Street precinct. However, it is critical that the streetscape and scale of Church Street can still be understood into the future. The area should be promoted as being a cultural asset along with other significant adjacent sites, and incentives for conservation of heritage items could be developed for the revised planning controls.

The following tables consider the specific issues for the Church Street study area and our guidelines for managing the heritage significance of the listed buildings items and their setting.

5.1 Strategic Policy/Further Studies for Church Street

The following strategic studies are recommended in order to protect the significance and manage the future of Church Street within the changing urban landscape envisaged for Parramatta:

Table 5.1 Recommendations for Further Studies.

Recommended Study	Details
Church Street Heritage Study and Development Control Plan	<ul style="list-style-type: none"> Church Street, from Lennox Bridge in the north to Macquarie Street in the south, should be listed as a Conservation Area within the Parramatta LEP. A heritage study of Church Street should be undertaken to identify those buildings that contribute to the character and significance of Church Street but are not listed as heritage items. The study should include recommendations for detailed development controls to guide appropriate future development, that acknowledge the status of Church Street as an area of heritage significance and protect those heritage values. This should include appropriate development guidelines for heritage items and contributory buildings and infill sites. The study should also consider the implementation of a heritage transfer scheme within the Parramatta CBD PP to allow bonus floor space to be transferred to other sites where it does not impact on the scale or character of the historic streetscape. The recommended boundaries of the proposed Church Street Conservation Area are indicated on Figure 6.1.

Recommended Study	Details
Public Domain Upgrade Strategy	<ul style="list-style-type: none"> A Public Domain Upgrade Study should be undertaken, and a strategy adopted by the City of Parramatta Council to promote and manage the upgrade of the public areas along Church Street in order to reinvigorate this important streetscape and attract quality businesses. Consideration should be given to the removal of vehicle access to Church Street, with the exception of the planned Light Rail.
Urban Design and Heritage Strategy	<ul style="list-style-type: none"> The retention of the existing 18m setback is a key recommendation of this report. It is noted that Council has recently resolved to amend the Planning Proposal to include a 12m setback. Should this amendment be pursued despite the recommendations of this report, Council should be required to provide a detailed Urban Design and Heritage Strategy justifying this amendment. This strategy should clearly identify the significance and tolerance for change for each specific site along Church Street and demonstrate where further development can occur without compromising the historic character of Church Street or causing additional heritage impact beyond the current 18m setback.

5.2 Recommended LEP Planning Controls for Church Street

The broad controls that have been proposed within the Parramatta CBD PP do not currently provide adequate protection or encouragement for conservation of heritage items within the Church Street study area. This part of Church Street must have specific controls in order to retain the significant streetscape and setting of heritage items within the study area. This is a highly significant heritage precinct within one of the oldest planned streets within Australia. It is rare to find these qualities remaining at a key gateway into a major CBD.

It is recommended that the PP be amended to reflect the following key recommendations. These are indicated in the proposed LEP maps (Figure 6.1–6.6).

Table 5.2 Recommended LEP Planning Controls.

Control	Recommendation
Heritage	<ul style="list-style-type: none"> Church Street, from Lennox Bridge in the north to Macquarie Street in the south, should be listed as a Conservation Area within the Parramatta LEP.
Setbacks	<ul style="list-style-type: none"> The current LEP setbacks along Church Street of 18m should be retained.
Height of Buildings/Podium heights	<ul style="list-style-type: none"> A 12m height should be seen as a maximum only and each podium height should be considered on a site specific basis, relating to its context. Podium heights should respond appropriately to adjacent heritage items and may not be consistent for the whole length of Church Street. Podium heights should be kept to a minimum to match the current streetscape of Church Street.

Control	Recommendation
Incentive Height of Buildings	<ul style="list-style-type: none"> There should be no incentive heights along Church Street. This is reflected in the PP and should not be changed. Site Specific Planning Proposals that propose heights above the maximum height of buildings should not be approved.
FSR	<ul style="list-style-type: none"> The blanket 3:1 FSR proposed for Church Street should be considered as a maximum.
Incentive FSR	<ul style="list-style-type: none"> A blanket incentive FSR of 10:1 is not appropriate for Church Street and would result in development that would significantly alter the scale and character of this important historic streetscape. The Parramatta CBD PP's proposed Incentive FSR of 10:1 and classification of sites along Church Street as 'Opportunity Sites', which would allow for a further increase in density, will have a significant detrimental impact on the historic streetscape. If an FSR of 10:1 is to be allocated to the heritage items within the study area, then a heritage transfer scheme should be incorporated as part of the Parramatta CBD PP to ensure that the bonus floor space does not impact on the scale or character of the historic streetscape. This would allow for 'compensation' for owners and reduce the pressure to develop heritage items.
Opportunity sites	<ul style="list-style-type: none"> The Parramatta CBD PP's proposed classification of sites along Church Street as 'Opportunity Sites', allowing further increased density, will have a significant detrimental impact on the historic streetscape. There should be no opportunity sites along Church Street.

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Church Street, Parramatta—Independent Review of Proposed Planning Controls, September 2018

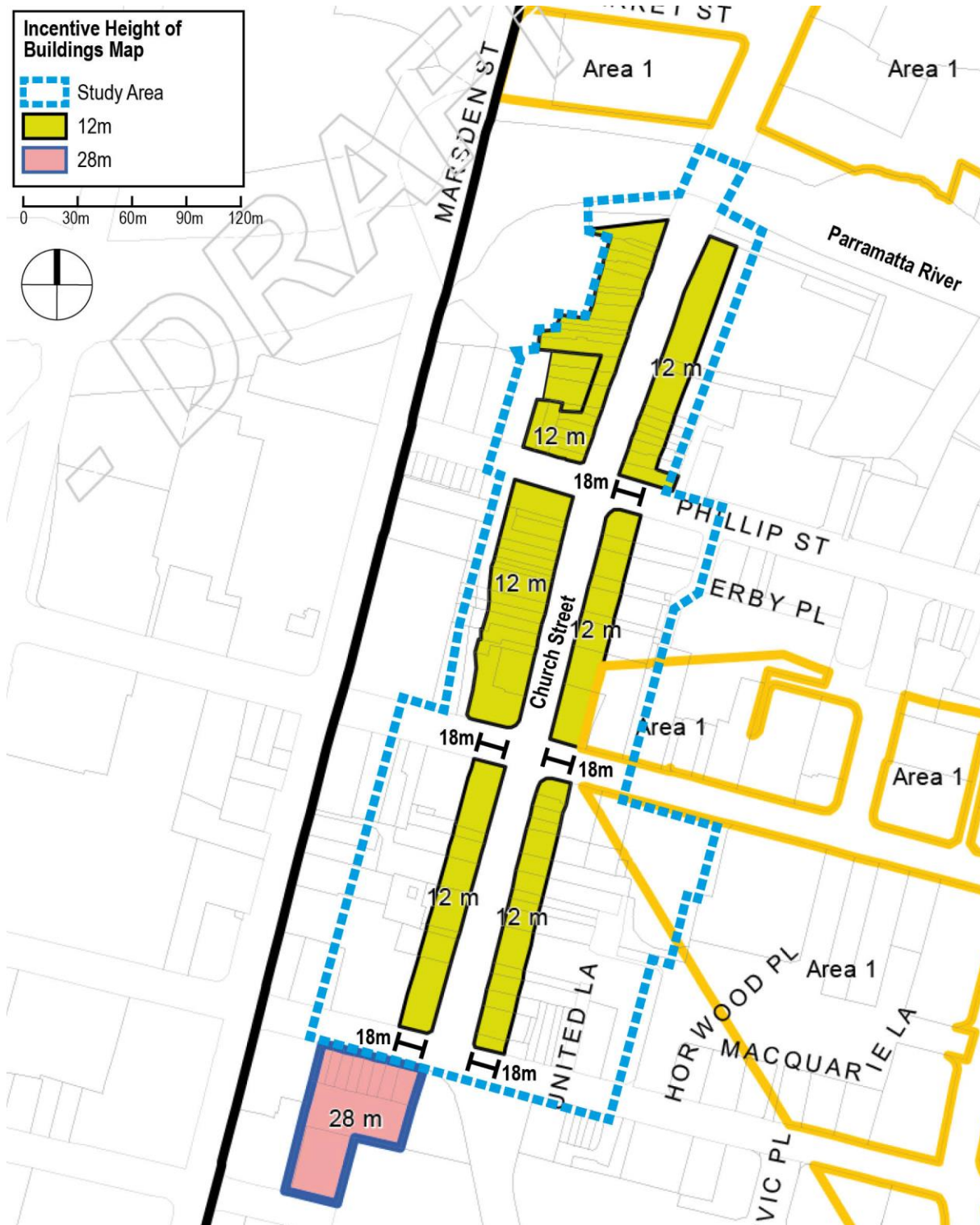


Figure 6.3 Recommended LEP Incentives Height of Buildings Map for Church Street. (Source: Parramatta CBD PP with heritage overlay, September 2018)

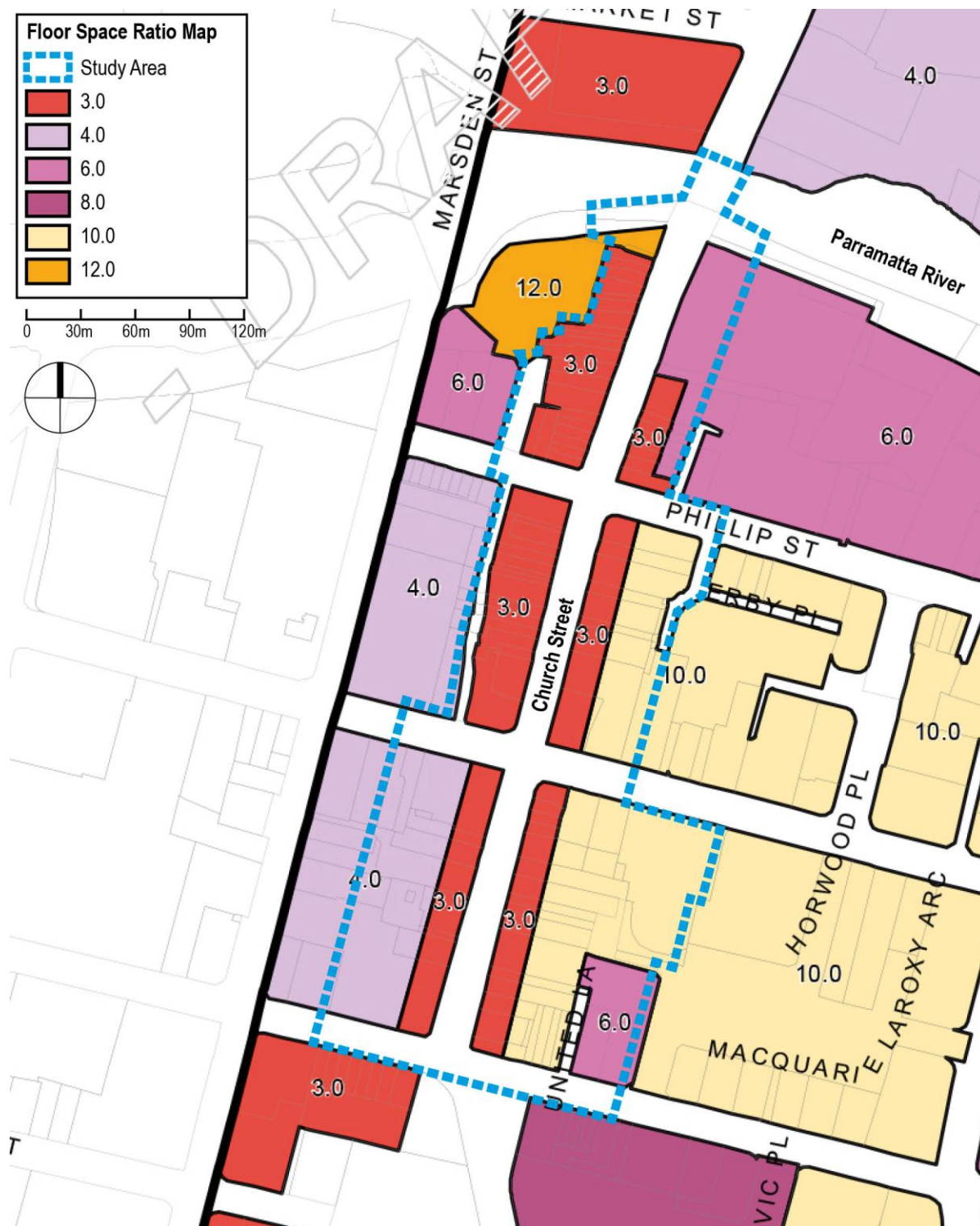


Figure 6.4 Recommended LEP FSR Map for Church Street. (Source: Parramatta CBD PP with heritage overlay, September 2018)

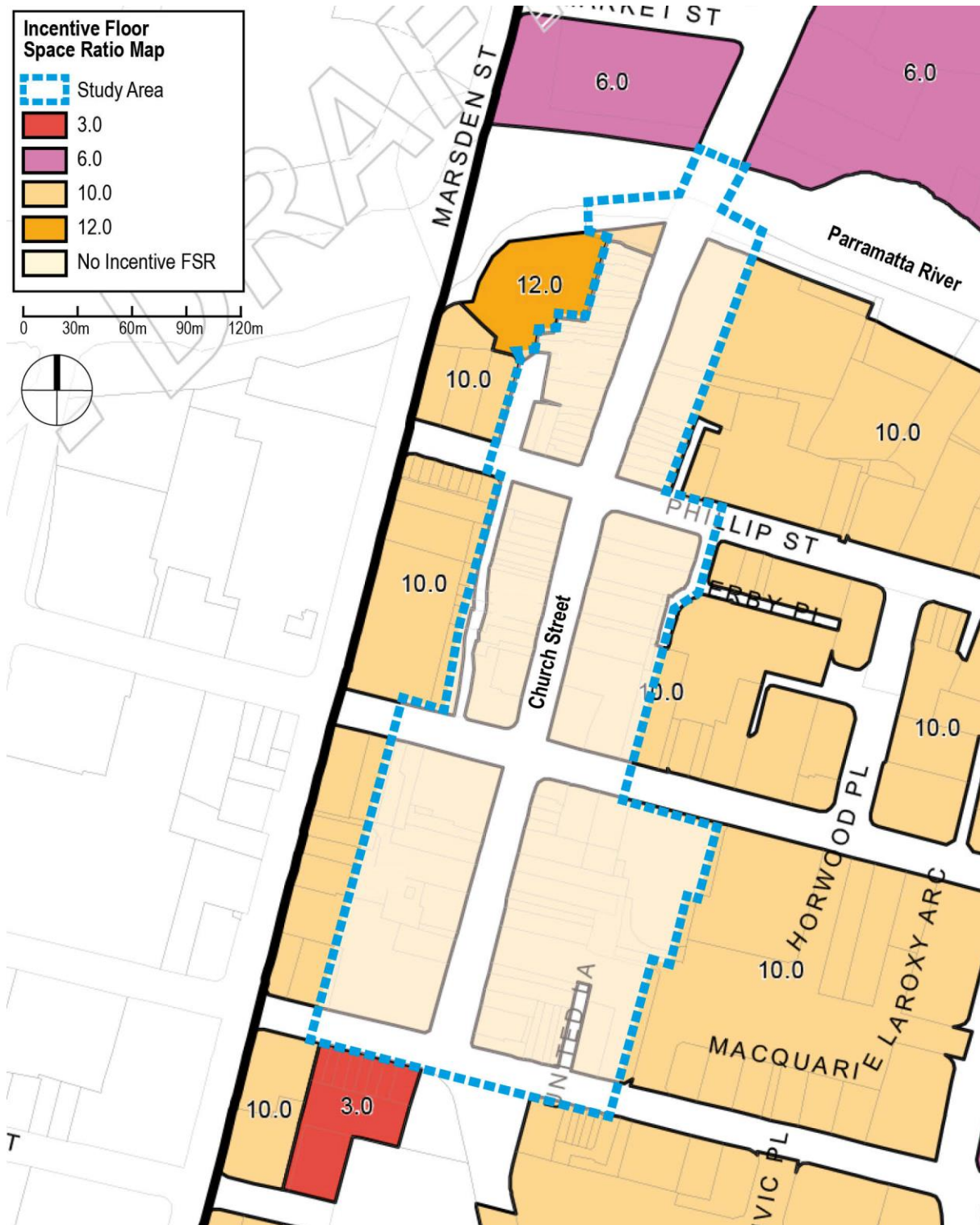


Figure 6.5 Recommended LEP Incentives FSR Map for Church Street. (Source: Parramatta CBD PP with heritage overlay, September 2018)

Church Street, Parramatta—Independent Review of Proposed Planning Controls, September 2018

5.3 Additional Planning Recommendations for Church Street

In addition to the recommended LEP planning controls, there are a number of specific recommendations to guide future development in Church Street.

Table 5.3 Additional Planning Recommendations for Church Street

Recommendation	Details
Design excellence	<ul style="list-style-type: none"> All future development along Church Street should be subject to design excellence.
Site amalgamation and subdivision pattern	<ul style="list-style-type: none"> The historic subdivision pattern along Church Street is of significance and should be retained. Site amalgamation should be avoided. Where new buildings are proposed, they should reflect the original subdivision through the articulation and detailing of the building's façade.
Areas of no further development	<ul style="list-style-type: none"> There is a concentration of heritage items between 291 and 325 Church Street, and 243 and 279 Church Street. This is an intact group of consistent scale heritage items. If development cannot be achieved on adjacent lots with 18m setbacks, then development should not occur.
Infill development sites	<ul style="list-style-type: none"> Redevelopment of these sites should be guided by the recommendations in this report in relation to height, setback, design and detail. The interface between new development and historic buildings should be carefully designed with respect to the character and significance of the streetscape. It is essential that new development is considered on an individual basis in terms and responds to its immediate context. Infill development should respond to, but not replicate, adjacent heritage items. The design should be guided by the document 'Design in Context' published by the NSW Heritage Office. Each proposal should include a detailed heritage impact statement that assesses the significance of each individual site, including its contribution to the Church Street historic streetscape, and the impact of the proposal on nearby heritage items and the Church Street streetscape. Appropriate consideration of materials and finishes along street level is critical to achieve acceptable infill development.
View corridors	<ul style="list-style-type: none"> The views along Church Street from Lennox Bridge to St John's and from St John's Church to Lennox Bridge and the Parramatta River should be retained. Significant sight lines of heritage assets located on corner sites should be retained in the round.
Street character/Public domain upgrade	<ul style="list-style-type: none"> The streetscape and public domain should be upgraded to encourage public access and reduce visual clutter in front of heritage items. Overshadowing of heritage items and public spaces should be considered in assessing future developments with minimum additional overshadowing.

5.4 Site Specific Planning Proposals

- The site-specific Planning Proposals at 295 Church Street, 197 and 207 Church Street and 89 Marsden Street, 220–230 Church Street and 286–300 Church Street have the potential for serious detrimental impact on the character and significance of Church Street, particularly when their impacts are considered cumulatively.
- The specific recommendations in this report include increased setbacks at development application stage. These recommendations should be imposed on any future stages of development on these key sites.
- Future stages of the approval of development on these sites should require with the recommended planning controls in this report.