

Independent Rapid Assessment of the Parramatta CBD Planning Proposal for DPE

1st March 2022

Bennett and Trimble

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Ongoing Review and Assessment

ASSESSMENT AND REVIEW TEAM

The report has been prepared by Matthew Bennett with the assistance of Matthew Haddrick. A regular series of presentations and workshops were held with Philip Thalís, Jane Irwin and representatives from DPE and GANSW. These discussions have been integral to the observations and recommendations in this assessment.

Review Process and Objectives

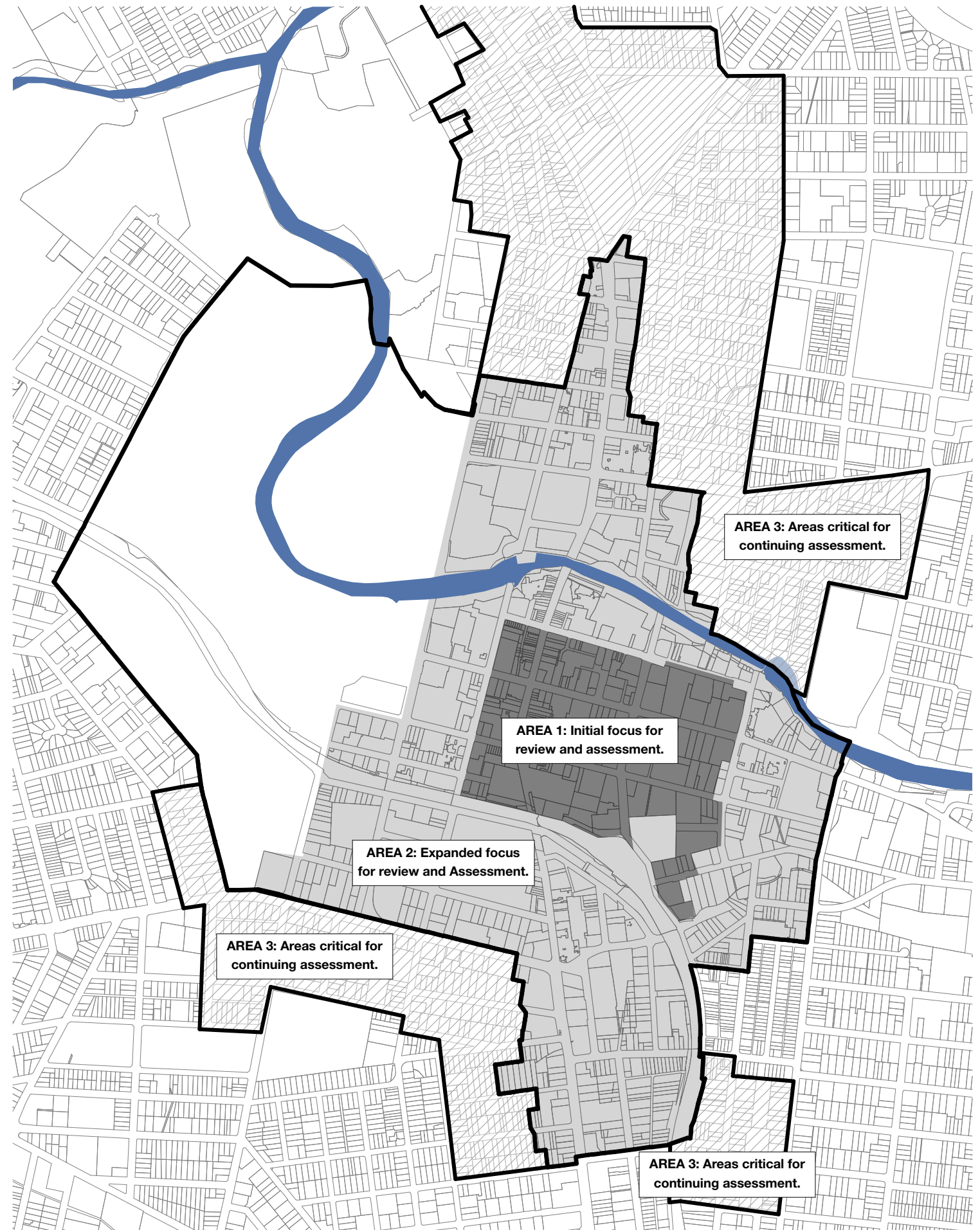
DPE commissioned Bennett and Trimble to review the Parramatta CBD Planning Proposal to assess whether the proposed controls respond to the historical, natural, cultural and social qualities of Parramatta, and the aspirations set out in the Central City District Plan for Parramatta as a desirable place to live and work as the Central River City.

The review was undertaken as a rapid assessment to determine if the proposed controls:

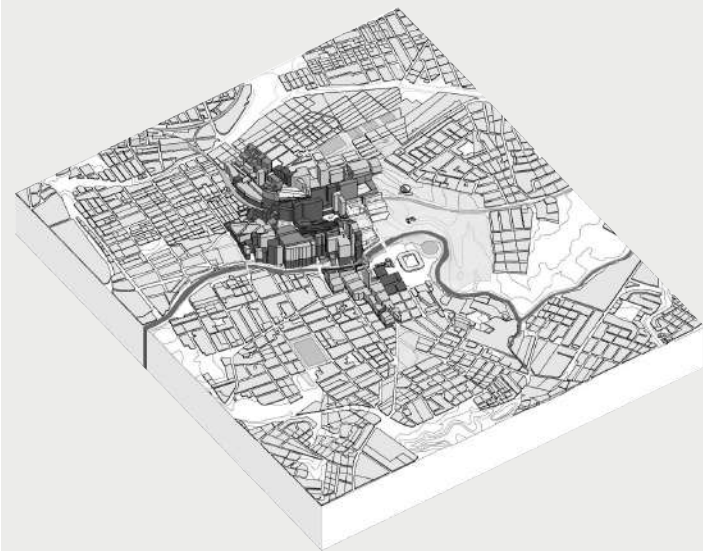
- result in urban design and built form outcomes that will assist in growing a stronger and more competitive Greater Parramatta.
- respond to and consider qualities such as open space, public domain, heritage, bulk, scale and transition.
- should proceed to finalisation as proposed or with minor changes that would not trigger further exhibition.

The focus of this assessment was identified as the area in the adjacent diagram, but as this review demonstrates, it has been necessary to review the Planning Proposal in a holistic way to assess whether the proposed LEP controls will deliver built form that is appropriate to the context of Parramatta.

This assessment has identified an area within the current Planning Proposal suitable for approval, areas where further information is required to inform the assessment process, and areas where alternative planning controls should be considered to alleviate development impacts.



Methodology and Assessment Process



Modelling Controls

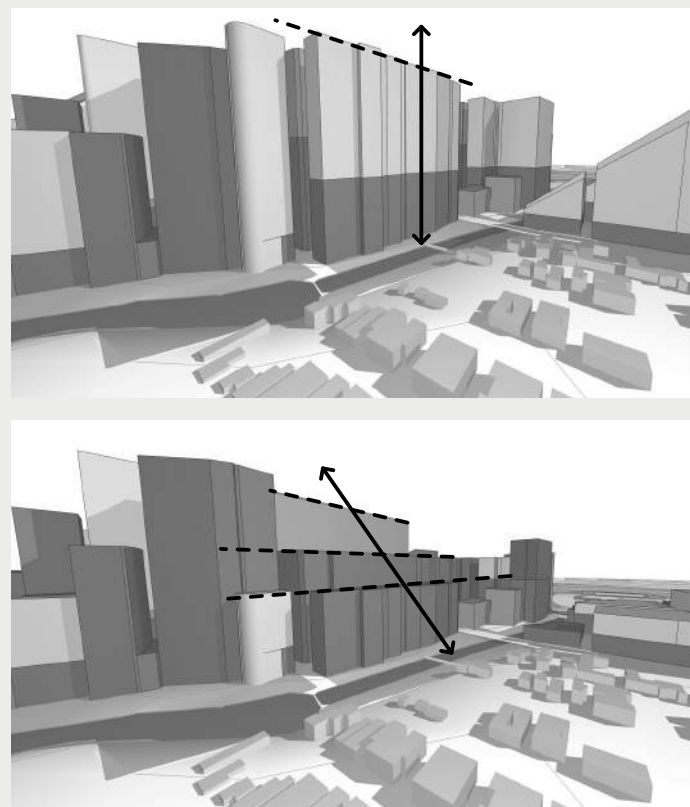
DIGITAL MODEL

A three dimensional model of the Planning Proposal area and the surrounding context was developed to illustrate:

- 2011 LEP height controls
- Approved building envelopes
- Current LEP height controls for the surrounding context
- Base and Incentive LEP height controls proposed in this Planning Proposal
- Recommended reductions to these LEP height controls
- Recommended LEP height controls for ongoing review and assessment.

DESIGN EXCELLENCE INCLUSION

Where applicable, height controls envelopes have been modelled to include a 15% design excellence height bonus to illustrate the full extent of permissible outcomes.



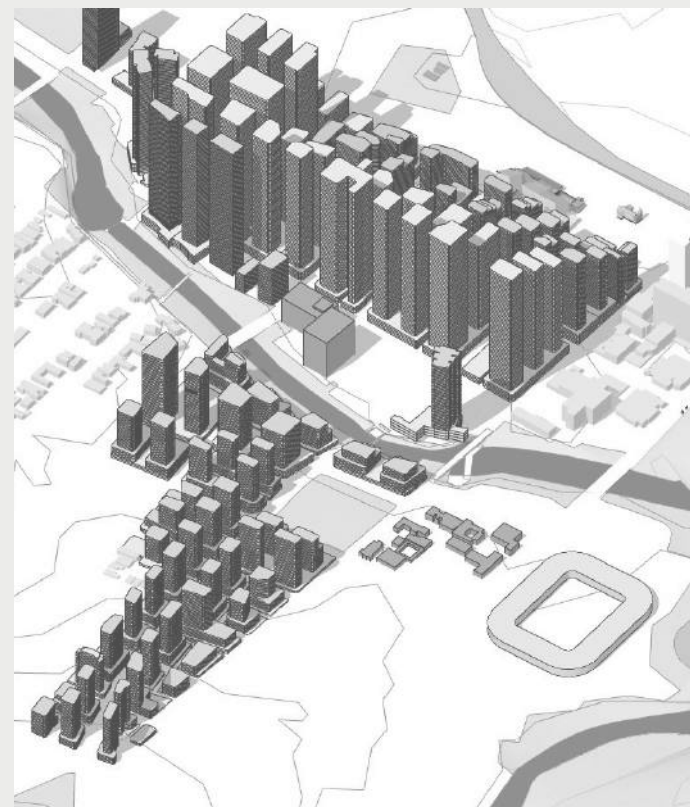
Analysis

COMPARATIVE ANALYSIS

This digital model has formed the basis for this review process by providing an objective and legible tool to compare the existing controls and the potential permissible outcomes. Where appropriate, a series of massing views, sections and diagrams have been included to illustrate this review process and the proposed recommendations.

URBAN MASSING

This model does not include DCP setbacks for each site or other specific special area controls, but rather illustrates the overall resulting urban form and massing that results from these controls, to understand and assess the broader impacts of height, scale, character and transition at the scale of the city.



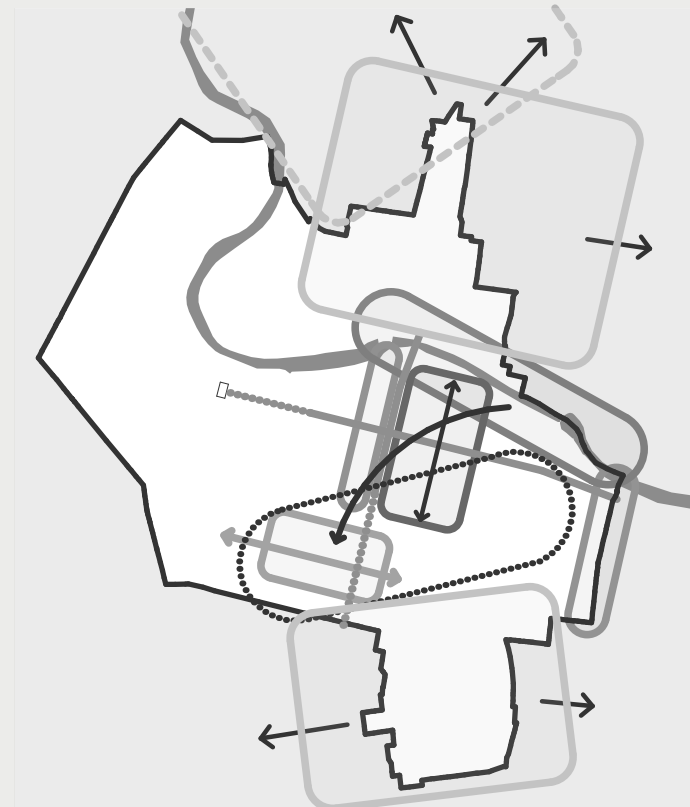
Potential Envelopes

MODELLING BUILT FORM

DPE has undertaken preliminary modelling to understand the potential maximum building envelopes that would be theoretically permissible under this Planning Proposal. This model forms a reference design that sits within the modelled planning envelopes.

MODEL EXTENT

The focus of this investigation was areas north of the existing rail alignment including the commercial core, the Parramatta river foreshore areas and Church Street north. The model does not include areas for Aird and Campbell Street or Auto Alley.



Assessment Process

REGULAR REVIEW SESSIONS

A regular series of presentations and workshops were held with representatives from DPE, GANSW as well as our internal review team, Philip Thalys and Jane Irwin, to review and discuss these materials and provide recommendations. These discussions have been integral to this assessment.

ASSESSMENT OUTCOMES

As this is a rapid assessment, recommendations are preliminary and should be subject to further testing by a range of specialist consultants including landscape, heritage, solar analysis, land economics and planning.

Strategic Context, Objectives, Targets and Economic Risks

Parramatta's Transformation

SUPPORTING GROWTH

Parramatta has undergone an extraordinary level of development over the past decade, and the need to reconsider the existing planning framework is well established.

THE CENTRAL RIVER CITY

The Planning Proposal clearly identifies the strategic role that Parramatta will play as a metropolitan centre for the Central River City. The importance of the CBD will increase as the population of Western Sydney grows and new transport infrastructure connects this population to the city centre.

COMMERCIAL CORE

To fulfil its functions as a metropolitan centre, there are incentives in the CBD Planning Proposal to prioritise commercial development within the CBD, and encourage the development of A-Grade commercial office space to meet strategic employment targets.

ATTRACTING INVESTMENT

To achieve these strategic outcomes, it will be critical to balance these incentives for high quality commercial office development with a series of urban outcomes that establish Parramatta as a city centre with an equivalent level of quality and amenity to the Sydney CBD, to make Parramatta a competitive and attractive alternative for business investment and relocation.

Housing and Employment Targets

STRATEGIC OBJECTIVES

The Planning Proposal clearly identifies the requirement for Parramatta to meet job and housing targets that are consistent with the current Greater Sydney Region Plan and Central City District Plan.

EMPLOYMENT TARGETS

Under the existing 2011 controls there is capacity for an additional 28,500 jobs which is less than the 2036 target of 34,500 additional jobs identified in Parramatta's Local Strategic Planning Statement. This Planning Proposal provides capacity for an additional 46,120 jobs with 1,6026,040 sqm of commercial development calculated at 24sqm per job.

HOUSING TARGETS

Under the existing 2011 controls, there is capacity for 4,410 dwellings which is less than the 7,180 additional dwellings required to meet the required 2036 housing targets under the District Plan. This Planning Proposal provides capacity for an additional 15,520 dwellings with 2,301,498 sqm of residential development.

QUESTIONING ASSUMPTIONS

A review should be undertaken to understand whether the surplus capacity in each instance is a reasonable allowance in calculating likely development outcomes, and what the current gap in meeting these targets is when recently completed projects and planning proposals that have been approved (or are under assessment) are taken into account.

Economic Risks and Opportunities

IRREVERSIBLE IMPACTS

If the proposed controls are approved in their current form, the resulting intensity of development could irreversibly impact the amenity, character and identify of the Parramatta city centre and its relationship with the river.

UNDERMINING ASPIRATIONS

The focus on growth to meet housing and job targets could result in an urban density that ultimately reduces the desirability of Parramatta as a place to live and work. The proposed controls risk undermining the wider strategic aspirations and objectives this Planning Proposal is intended to support. This would be a perverse and unfortunate outcome for Parramatta.

ONCE IN A LIFETIME OPPORTUNITY

If the proposed controls are approved, it will be extremely difficult and expensive to introduce protections to reverse these impacts, to retroactively introduce controls to preserve the historical, natural, cultural and social qualities of Parramatta, and to undertake the level of urban renewal necessary to support the level of projected growth in density.

The establishment of a considered and holistic planning proposal for the CBD and Greater Parramatta is a once in a lifetime opportunity to deliver strategic, economic and urban benefits for current and future generations.

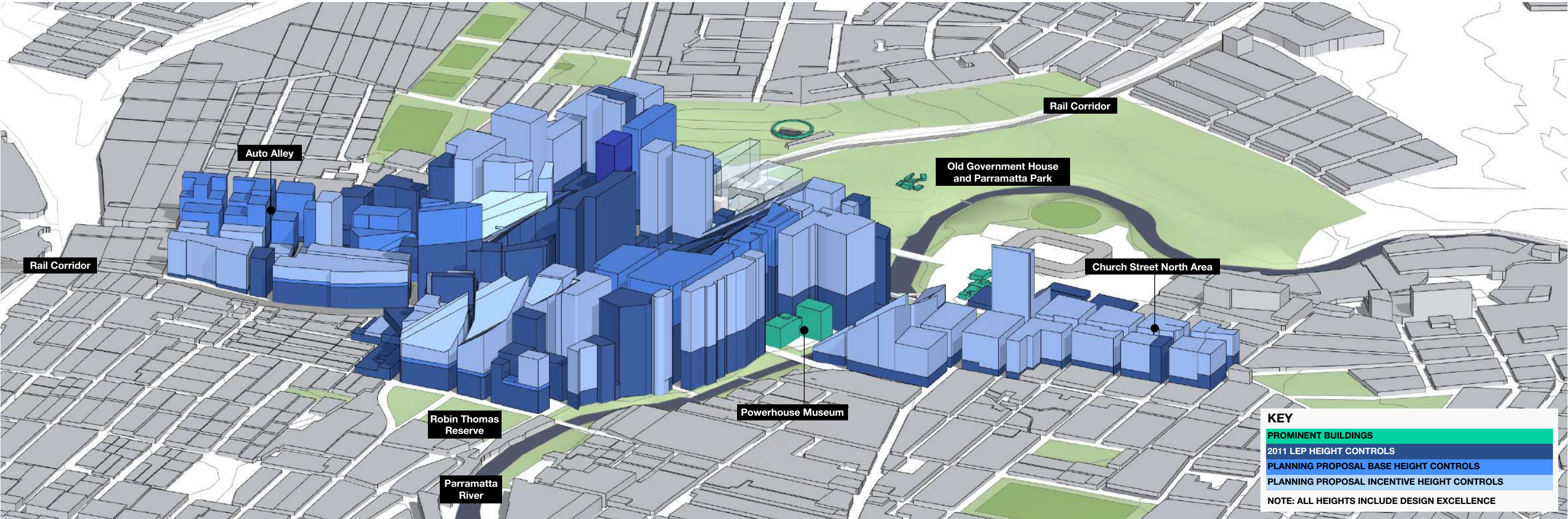
Opportunities to Rebalance Density

IDENTIFY OPPORTUNITIES

Opportunities should be explored to rebalance density, scale and mass to alleviate development impacts and align with public transport initiatives. This review process has identified the following options for further consideration:

- The expansion of the B3 Commercial Core zoning and an increase to the permissible heights within the Aird Street retail area to rebalance building height and mass while maintaining the capacity to meet current and future employment targets.
- Expanding the range of commercial office typologies that offer alternatives to towers (e.g. low rise warehouse-style or atrium office buildings) to increase opportunities for commercial accommodation in urban transition areas.
- Redistributing dwellings to areas adjoining Church Street North and Auto Alley, or areas nominated for future planning investigations in Greater Parramatta, where medium density formats would increase housing diversity, while providing transitions in urban scale.
- Since the initial lodgement of this Planning Proposal, a range of locations across Western Sydney have been identified for commercial investment and job growth including Bradfield and Bankstown. A wider strategic redistribution of jobs could be considered to deliver job targets and dwelling supply, support Regional and District Initiatives, and alleviate the development pressure on Parramatta.

Key Observations



Aerial perspective looking south west showing the proposed CBD base and incentive height controls in relation to the surrounding height controls

THE BOUNDARY IS TOO RESTRICTIVE

The area defined by the Planning Proposal boundary is insufficient to design and develop an integrated urban environment for the city centre and Greater Parramatta. The extent of development proposed to meet strategic growth targets has resulted in an abrupt interface between the heights permissible within the Planning Proposal boundary and the surrounding context. Most significantly, the limited boundary area has resulted in a lack of integration with wider transport initiatives, such as the Parramatta Light Rail Corridor, to establish a range of new centres and deliver density in a more strategic, considered, and sustainable way.

CAPACITY AND EXPEDIENCY

There appears to be little strategic direction other than increasing capacity by incentivising development opportunities in the city centre, and to provide an expedient mechanism to assess the increasing number of planning proposals submitted for consideration.

RISK OF HYPER DEVELOPMENT

The restrictive boundary has resulted in controls and incentives that permit and encourage extraordinary levels of development in the city centre to meet strategic job and dwelling growth targets. These development outcomes risk overwhelming the existing public domain, heritage qualities and natural environment of Parramatta.

UNBALANCED OUTCOMES

The narrow focus on delivering growth has not been balanced with an understanding of city-making and the level of civic character and amenity that will be required to transform Parramatta into a metropolitan centre that can attract high quality business investment and job growth. The impacts of the proposed development could undermine the wider strategic objectives for Parramatta.

SIMPLISTIC SPATIAL PROPOSITION

The proposed height controls and requirements for solar access to Parramatta Square and the Barracks have loaded height on the Parramatta River foreshore and resulted in a singular and overly simplistic spatial and urban form for the city centre.

UNDERSTANDING INTERFACE AREAS

There is a lack of information for the adjoining areas to adequately assess the appropriateness of the planning controls for the Urban Interface Areas - Church Street North, Auto Alley and the Campbell Street/GWH Area - to understand the transition of urban scales, public domain integration and land use strategies.

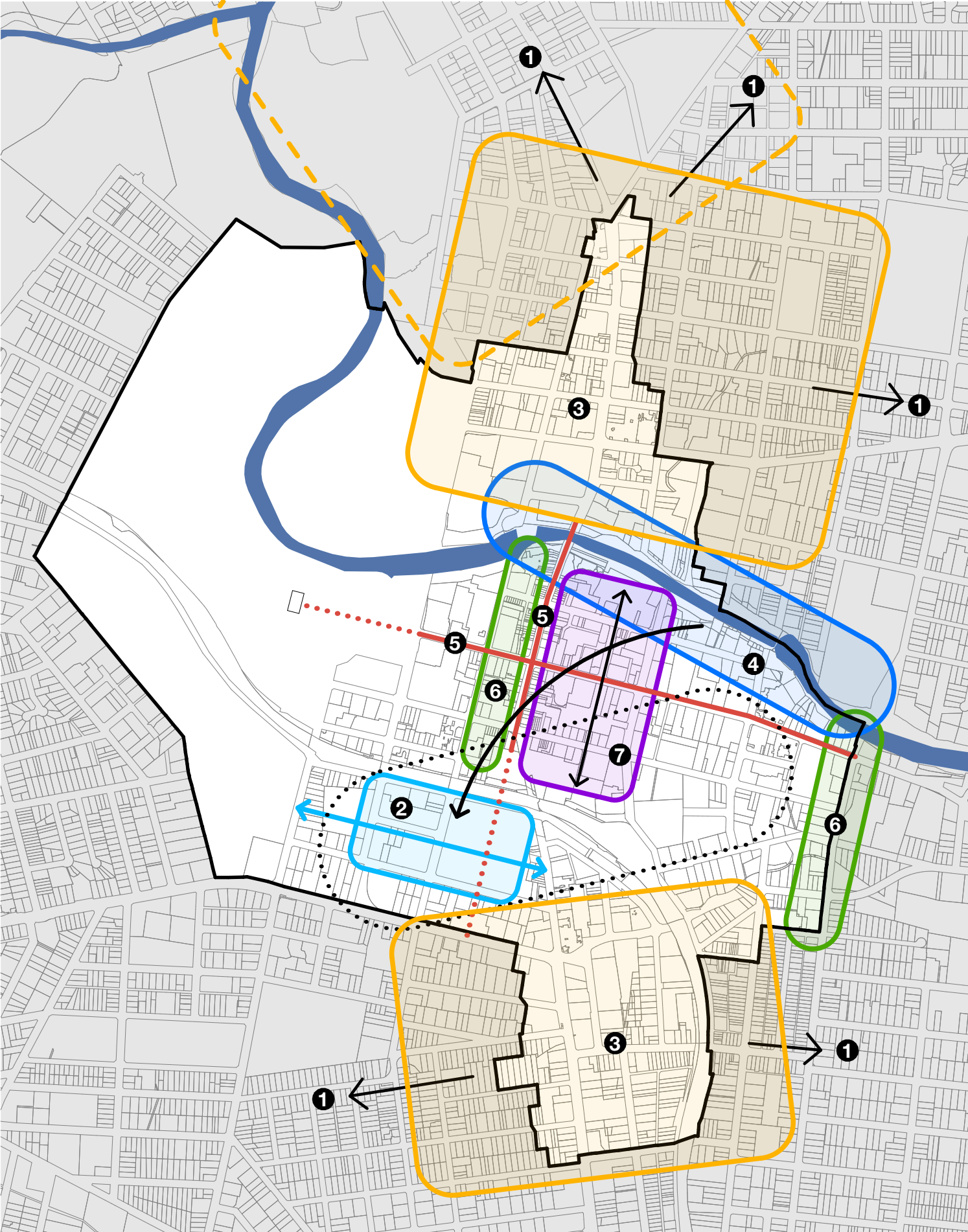
LACK OF OPEN SPACE INITIATIVES

There is no corresponding public domain proposition within the Planning Proposal to support the projected increases in density or to provide adequate protection to the existing range of open spaces.

OVERWHELMING THE RIVER

As the metropolitan centre of the Central River City, the relationship between the river and the CBD will be critical to its future cultural identity and its desirability as a place to live and work. The scale of development these controls permit risks overwhelming the scale of this important natural, historical and cultural asset.

Key Recommendations



Diagrammatic overlay illustrating key area recommendations

General Recommendations:

1 EXPAND THE PROPOSED BOUNDARY

Expand the Planning Proposal boundary to develop an integrated urban environment for Greater Parramatta to distribute density in a more considered and holistic way. An expanded boundary will take full advantage of the proposed public transport initiatives and offer increased employment and housing opportunities alongside broader strategies for city-making, urban renewal and the establishment of new urban precincts.

PUBLIC DOMAIN INITIATIVES

Develop a public domain proposition to balance the projected increases in density with the provision of new public open spaces and the establishment of controls to protect and extend the amenity of the existing public domain. It will be vital to provide a level of amenity that is comparable to the Sydney CBD but unique to Parramatta, to attract high quality investment to support the projected increases in density, and to establish Parramatta as a metropolitan centre for Western Sydney.

MITIGATING RISK TO HERITAGE ITEMS

More consideration should be given to Parramatta's considerable range of heritage elements as they risk being overwhelmed by the scale of development.

2 EXPAND THE COMMERCIAL CORE

Expand the B3 Commercial Core zoning to the Aird Street retail area as originally proposed in this Planning Proposal to provide additional opportunities for commercial growth to meet employment targets, to rebalance building height and mass from the riverfront and Civic Link area, and to incentivise urban renewal and retail development that is appropriate for an established metropolitan centre.

3 ASSESSMENT OF INTERFACE AREAS

Undertake an assessment of the proposed controls for Church Street North, Auto Alley and the Campbell Street/ GWH Area when further progress has been made regarding controls for the adjoining areas to get a better understanding of the transition in urban scales that occurs at the boundaries of this proposal, and wider initiatives to expand the public domain and improve urban structure.

Spatial Recommendations:

DEFINE THE CITY SPATIALLY

Develop a series of spatial strategies for the city that respect and enhance the urban form, public spaces and civic qualities of Parramatta. Establish a range of place-specific height controls and massing strategies to define precinct character and edge conditions. The following key areas have been identified for further consideration and detailed assessment:

4 RESPECT THE RIVER FORESHORE

Reduce the proposed height incentives for buildings along the Parramatta River foreshore to protect the natural, historic and cultural qualities that are so central to the identity of Parramatta and its place within the Central River City. The permissible building envelopes should be commensurate with the scale of the river rather than a harbour.

5 REINFORCE GEORGE & CHURCH ST

Reinforce the historic, urban and cultural importance of the George and Church Street alignments by embedding DCP setback controls within the LEP, respecting established view corridors, reducing height controls where appropriate, and improving solar access. Specific solar access controls should be considered for Centenary Square that recognise its urban and historic significance.

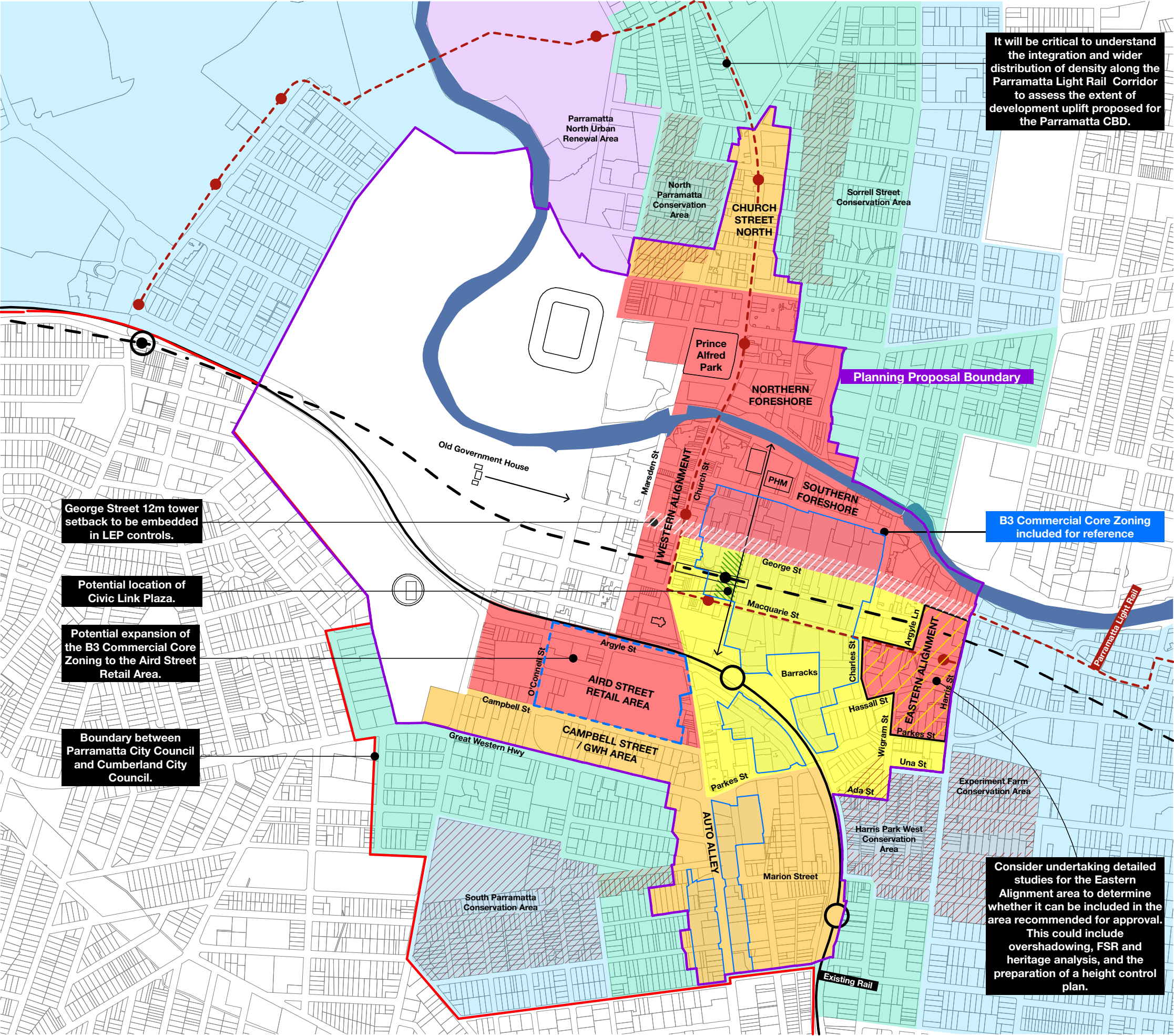
6 ESTABLISH CITY EDGES

Develop detailed controls to the eastern and western alignments to mediate between the scale and height of the central tower clusters and the sensitive parklands and historic areas they adjoin, and to define new urban edges with consistent and legible massing and form.

7 DEFINE THE CIVIC QUARTER

Reduce the proposed height controls in the area around the Civic Link to provide greater solar access, sky views and urban amenity for the public domain, and to establish an urban quarter with a distinct scale and character that differentiates it from the historic area to the west and the taller commercial precincts to the east and south. Explore opportunities to establish a civic plaza as the focus and identity for the quarter, and to reinforce Civic Link as a pedestrian spine connecting a series of public spaces between the city centre and the Parramatta River.

Staged Approval and Assessment Recommendations



Recommended areas for approval

This review has identified an area where the proposed controls can be approved in their current form. This area sits largely within the B3 Commercial Core Zone and includes sites with substantial height controls that will have less impact on sensitive historic areas and public open spaces.

Areas where further details are required for review and assessment

This review process has identified Auto Alley and the Campbell Street/GWH Area as precincts where approval of the proposed planning controls may be possible if the planning controls proposed for adjoining and surrounding areas can be made available to inform this assessment process. There are stronger concerns in regards to the proposed massing along Church Street North but this should be assessed with a greater understanding of adjoining investigations. In each instance, this contextual information will allow a better understanding of the transition in urban scales that occurs at the boundaries of this proposal, and wider initiatives to expand the public domain and improve the urban structure to support the projected growth in density.

Areas where alternative planning controls should be considered

This assessment process has identified a series of areas where amendments or reductions to the base and incentive controls are recommended to alleviate development impacts on the sensitive historic areas, the existing and proposed public domain, key streetscapes, and the Parramatta River foreshore. Preliminary recommendations have been included with this assessment, however these recommendations will require further detailed investigation and specialist consultant input to test and confirm what the most appropriate controls should be.

Contextual considerations

Adjoining areas where further details are required to assess the urban interface areas within the boundary of this Planning Proposal

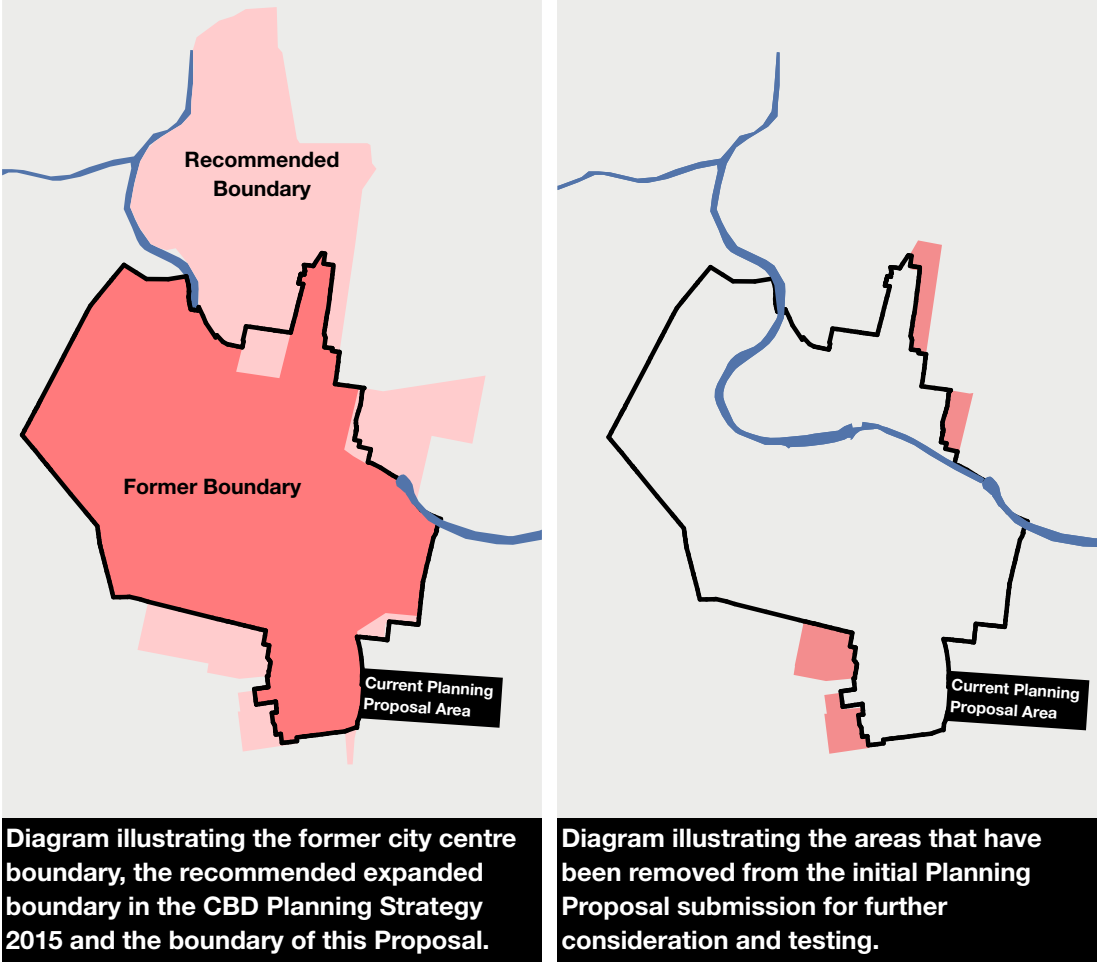
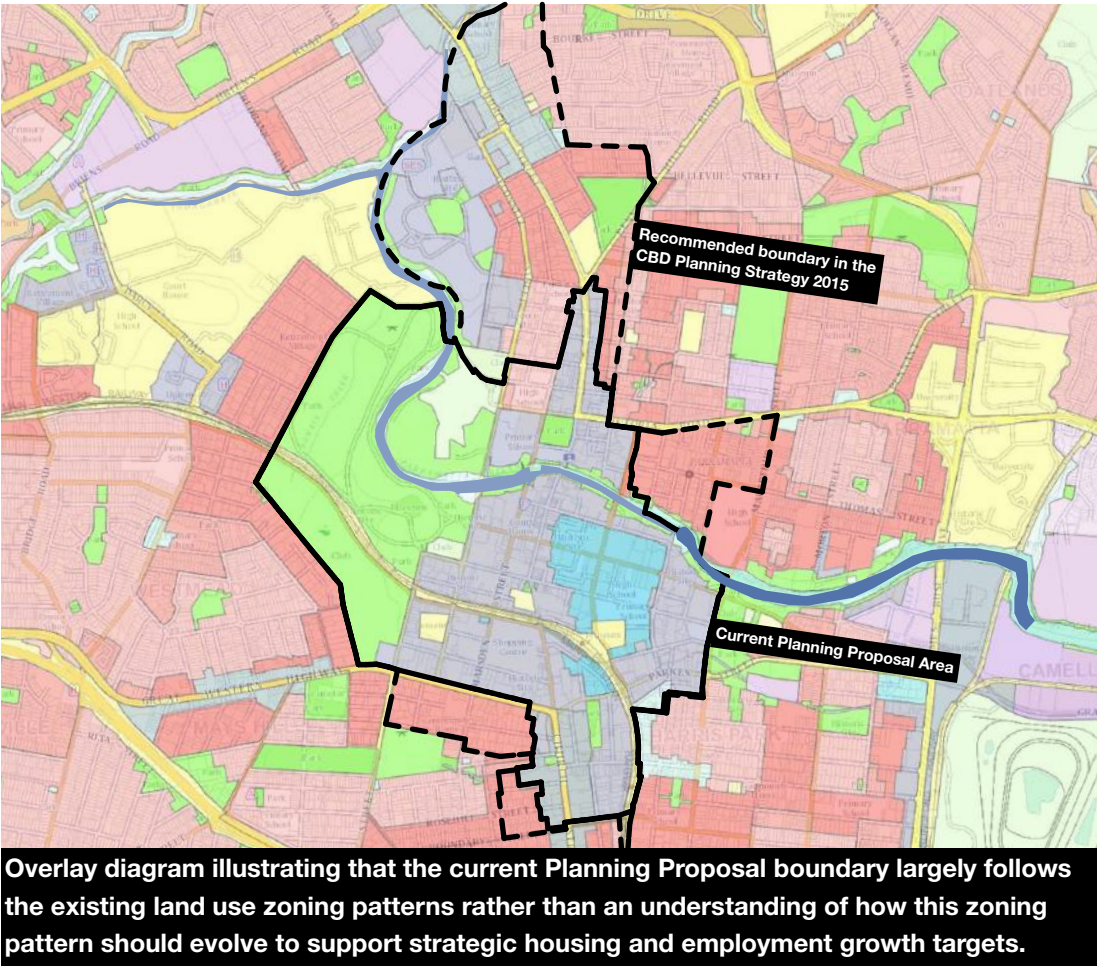
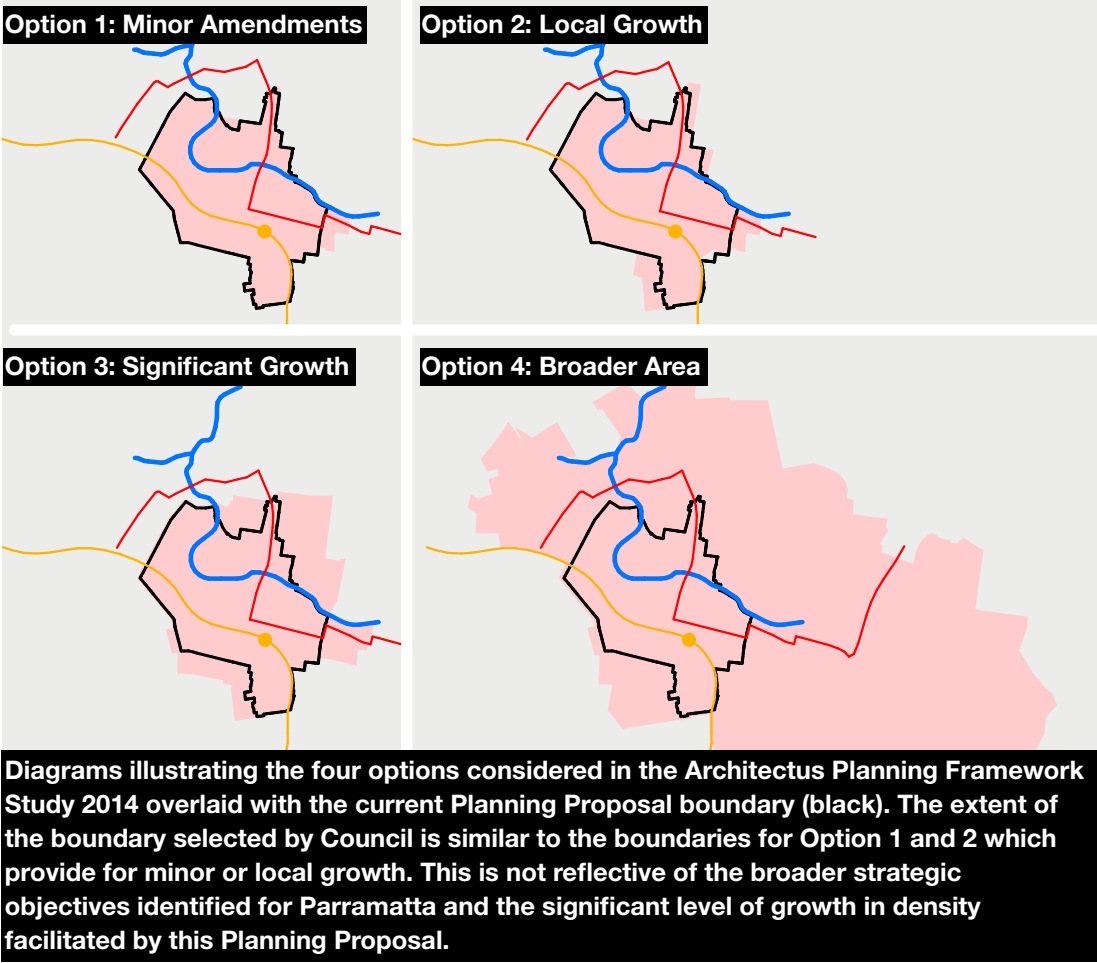
Surrounding areas where further information will assist in the assessment of the urban interface areas within the boundary of this Planning Proposal

Parramatta North Urban Renewal Area - Further details for this area will assist in the assessment of the Church Street North interface area.

General Observations and Recommendations

- **Expanding the Boundary**
- **Balancing Strategic Growth with Open Space Outcomes**
- **Incentives, Building Typologies and Development Opportunities**

Expanding the Boundary



Observations

Both the Architectus Planning Framework Study 2014 and the Parramatta CBD Planning Strategy 2015 recommend expanding the City Centre boundary to align with the strategic vision for Greater Parramatta and the growth projected for the city. This would result in a holistic and integrated plan for the area in terms of density distribution, scale and transition, open space and connectivity, and better alignment with transport initiatives.

The boundary for this Planning Proposal largely follows existing land use patterns which disregards this advice, and limits the opportunity to develop an integrated proposal for Greater Parramatta.

The initial boundary for this Planning Proposal was larger than the current area under assessment. Areas adjoining the urban transition areas of Church Street North, Auto Alley and Campbell Street / Great Western Highway have been removed as they are considered as sensitive areas requiring further investigation. It will be critical to understand what is proposed in these areas to assess this Planning Proposal.

It is possible that the boundary was retained for expediency, to limit political controversy in regards to development impacts on neighbouring areas, and to provide a mechanism to address the increasing number of planning proposals prepared for the city centre.

These actions have resulted in a Planning Proposal with density that is hyper concentrated in the CBD, rather than a more considered and integrated proposal for varying and distributed densities across a wider area.

Recommendations

An expanded Planning Proposal boundary should have been considered to align with broader objectives, public transport initiatives, planning studies, and previous consultant advice.

The review and assessment of a significant portion of this Planning Proposal is contingent on understanding what planning controls and development uplift are being considered in adjoining and surrounding areas.

Balancing Strategic Growth with Open Space Outcomes



Diagram illustrating open space distribution within the Sydney CBD

A COMPARISON WITH CITY OF SYDNEY
A comparison with the City of Sydney CBD is useful in comparing the extent, distribution, scale, use and accessibility of public open spaces within the Parramatta CBD. It will be critical to balance incentives for urban development with a series of urban outcomes that establish Parramatta as a city centre with an equivalent level of quality and amenity to the Sydney CBD but unique to Parramatta, to make the city a competitive and attractive alternative for business investment and job relocation. Key observations include:

THE SCALE AND AMENITY OF SYDNEY HARBOUR
The difference in the scale of Sydney Harbour in relation to Parramatta River is significant. It is important to recognise the role the harbour plays in balancing the impact and scale of urban development in the Sydney CBD, and the relative amenity, sky view, natural air flow and outlook it provides. It sits as a large open space within the city centre and is central to Sydney's identity and amenity.

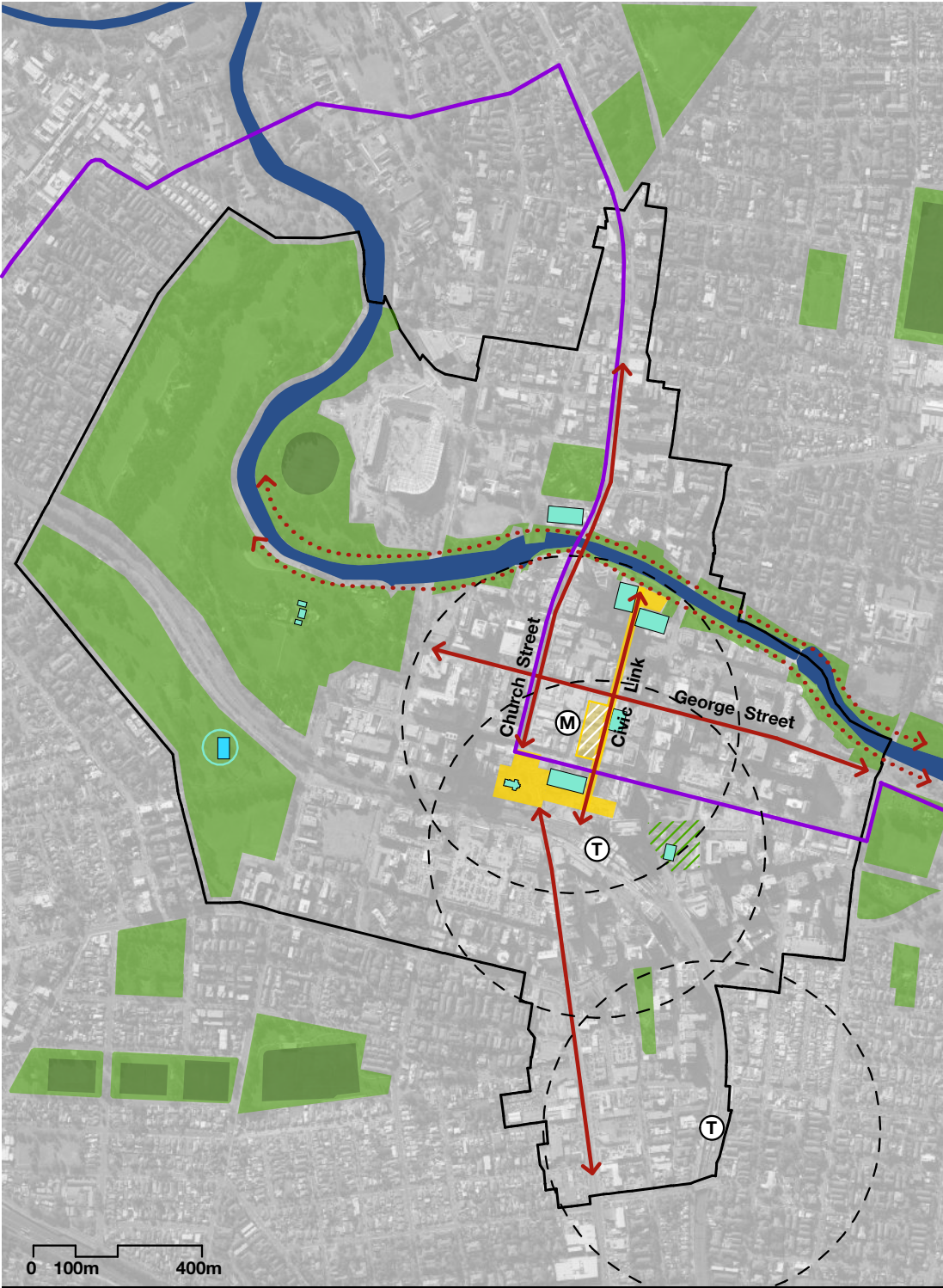


Diagram illustrating open space distribution within the Parramatta CBD

THE RELATIVE SCALE OF PARRAMATTA RIVER
The height of development proposed along the southern foreshore of Parramatta River is similar to the size of commercial development along the foreshore of Barangaroo, and yet the scale of the river is considerably smaller than Sydney Harbour and the buildings risk overwhelming and irreversibly damaging this important natural and historic asset.

DIVERSITY OF OPEN SPACES
The diversity of open spaces provided within the Sydney CBD and the level of amenity, choice and access they provide for workers at lunchtime is a key attraction for businesses and investment.

Parramatta has identified important initiatives such as Civic Link and the River Square to compliment Parramatta Square, but this range should be protected and extended as part of this proposal.

Observations

There appears to be little strategic consideration in the Planning Proposal other than increasing dwellings and commercial floor space through the provision of large tower buildings. There is no corresponding public domain proposition to support the projected increases in density.

The narrow 12 noon - 2pm window for solar access that applies to selected public open spaces is too limited and privileges office workers on lunchtime breaks rather than considering a wider range of users such as residents and visitors. Considerations within the Architectus report to include solar controls to the Civic Link were not adopted by Parramatta City Council as they would impact development outcomes. This decision is short sighted and needs to be revisited.

The proposal to include solar access controls to Church Street does not appear to be adopted. This should be considered further as part of the assessment process together with solar access to Centenary Square to recognise its urban significance.

The Barracks is not publicly accessible and the majority of the green space is on the periphery of the city centre.

Recommendations

The Planning Proposal should include a clear open space strategy to illustrate how the projected increases in housing and employment will be supported by the provision of new public open space, and how the amenity of the existing open spaces can be retained, protected and enhanced.

The scale and extent of urban massing should be carefully calibrated in relation to the series of existing and proposed open spaces, with particular reference to the river foreshore, Parramatta Park, historic precincts and the proposed Civic Link and associated spaces.

The impacts of development should be re-assessed in terms of overshadowing, sky view, wind, character, scale and heritage considerations.

The extent and range of solar access controls should be expanded to include at a minimum Church Street, Centenary Square, Civic Link. A wider variety of sun access windows should be considered to provide amenity across periods of the day for residents, workers and visitors.

Explore opportunities to make the Barracks publicly accessible to increase the amount of green open space in the city centre.

Investigate strategies to enhance connections between the CBD and Parramatta Park to provide easier access and more opportunities for recreation.

Incentives, Building Typologies and Development Opportunities



Incentives & Bonuses

CONSIDERATIONS

The Planning Proposal includes a series of incentives and bonuses to encourage site amalgamation with additional height and FSR, and to deliver design innovation and urban, sustainable and community outcomes.

The emphasis appears to be on capacity and targets, rather than establishing a more considered balance between density and urban outcomes.

The resulting controls are confusing and convoluted and they would be very difficult to unscramble if they are implemented.

RECOMMENDATIONS

A simplification of the proposed controls and mechanisms should be considered as part of a more detailed review.

The proposed unlimited FSR provision for commercial development in the B3 zones can be retained while maintaining a balance between the strategic objectives of delivering high quality commercial office space with good urban design and public domain outcomes. The implementation of these recommendations to reduce height controls in specific locations, together with the application of the DCP controls, will assist in achieving this balance.



Local Provisions & Opportunity Sites

CONSIDERATIONS

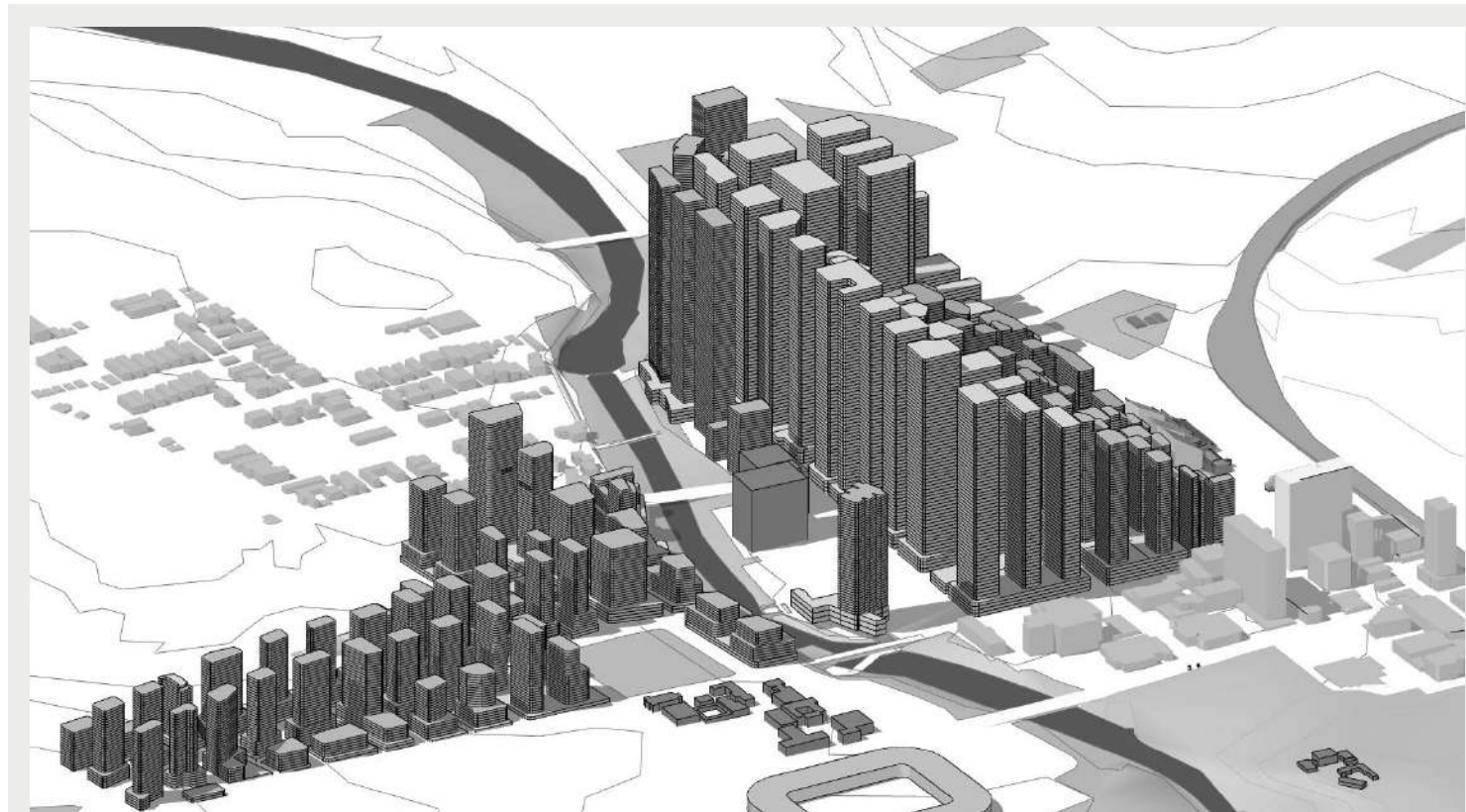
Additional incentives are provided within a series of Opportunity and Local Provision sites which are located in the most sensitive areas adjoining heritage areas, open space and the Parramatta River foreshore.

There is a risk that this could result in unpredictable development outcomes, in areas where more definitive and calibrated controls would be preferable.

The number of opportunity sites has been reduced based on work undertaken by Council and their consultants since the Gateway determination. The confirmation of the Powerhouse Museum site would appear to eliminate the need for this opportunity site.

RECOMMENDATIONS

The requirement for Opportunity and Special Provision sites should be reconsidered in preference for simpler controls that deliver more predictable and considered urban outcomes.



Commercial Typologies

CONSIDERATIONS

The proposal encourages the development of large floor plate office towers to provide commercial space. While there is undoubtedly a need for this typology to deliver A-Grade commercial office buildings within the commercial core to meet strategic objectives and targets, there appears to be an over reliance on the amalgamation of sites to deliver podium/tower typologies across the wider area.

There doesn't appear to be any incentives for well considered finer-grain commercial development that isn't reliant on such large site amalgamations to realise the benefits of providing commercial accommodation, or alternative commercial building typologies and innovation. DPE's modelling of potential permissible built envelopes supports these concerns.

RECOMMENDATIONS

In addition to controls to encourage high quality commercial tower development, controls should be considered that encourage a complimentary range of commercial building types, particularly in the urban transition areas and the PLR corridor. The example of larger format commercial buildings provided by the adaptive re-use of warehouse buildings in Surry Hills and Pyrmont could be a good example to consider in future investigations.

Residential Typologies

CONSIDERATIONS

The incentives to encourage site amalgamation and the development of tower/podium typologies also has substantial impacts on the provision of housing diversity and density.

While the Parramatta Local Housing Strategy has identified that Parramatta will easily achieve the dwelling targets identified in the District Plan, it also notes a lack of housing diversity across Parramatta with 70% of all dwellings in 2036 to be apartments. It recommends investigations for more medium density housing types in suitable locations.

RECOMMENDATIONS

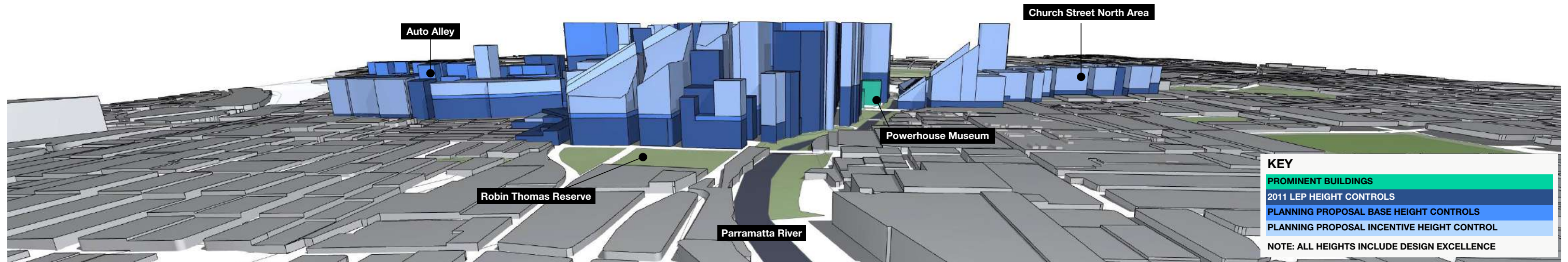
Consideration should be given to fine grain and alternative housing typologies to increase housing diversity and provide opportunities for a wider range of property developers and land holders to stimulate development and local economic activity.

In the areas adjoining urban transition areas, medium density formats would increase housing diversity and supply across Greater Parramatta while providing a transition in scales between high density areas and low-rise heritage and suburban areas.

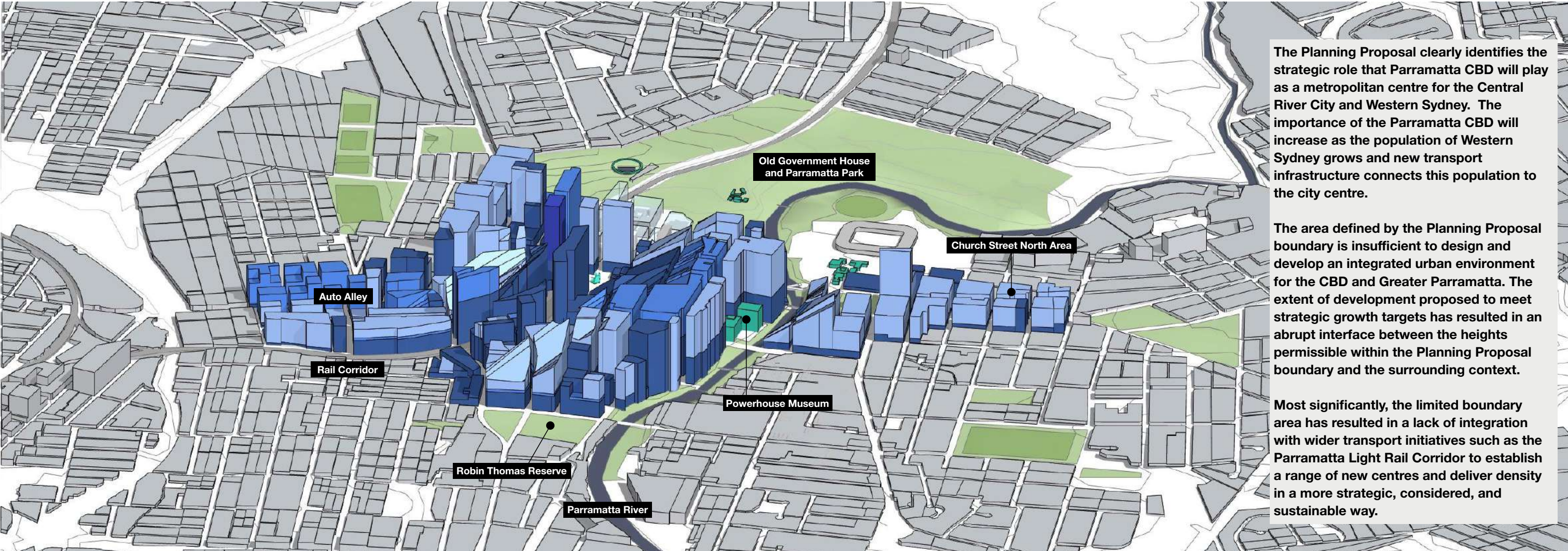
Spatial Observations and Recommendations

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 - **Broader Contextual Observations**
 - **Existing Built Form and Approved Planning Proposals**
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Broader Contextual Observations



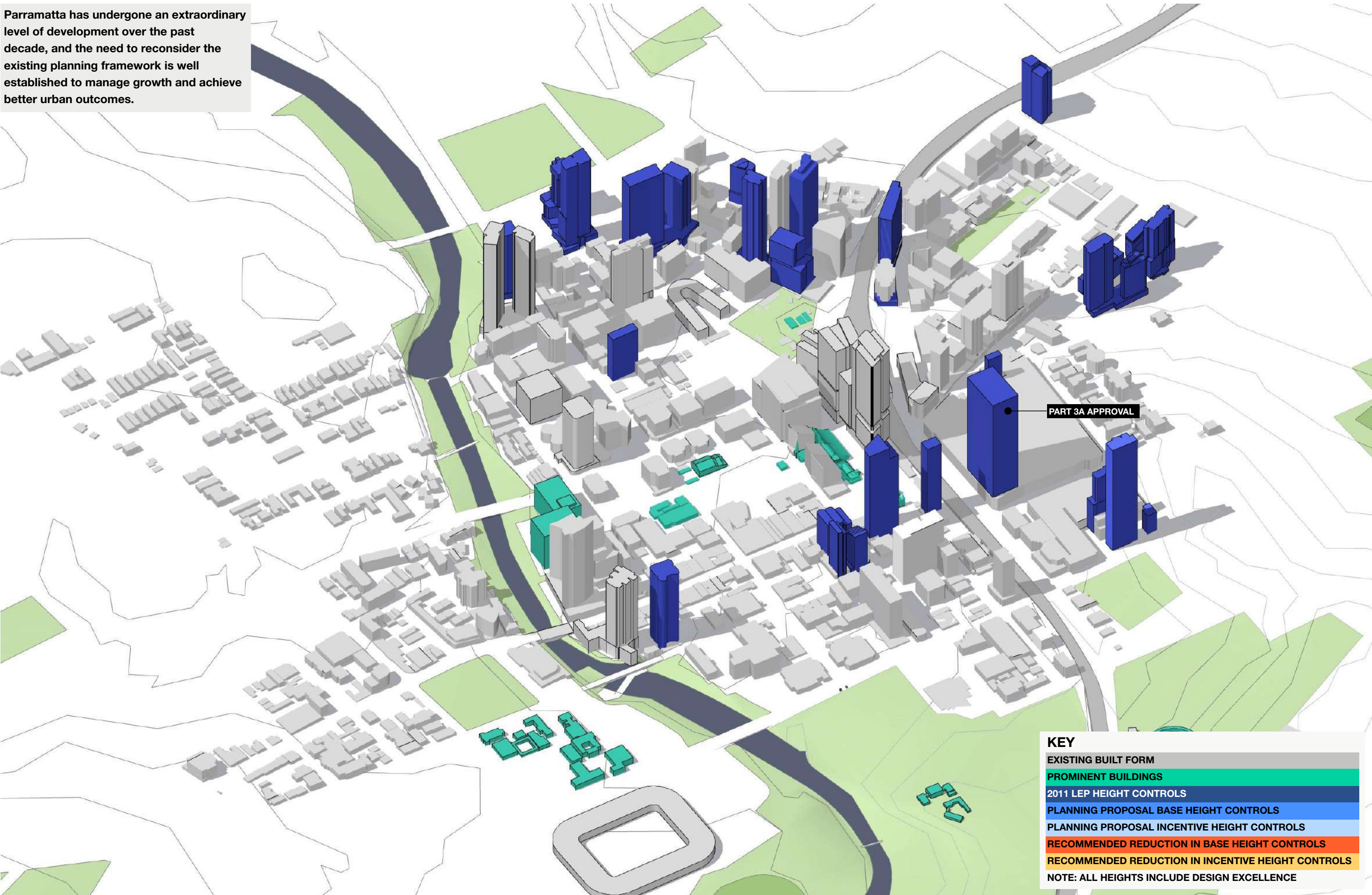
Eastern Approach along the Parramatta River showing the proposed CBD height controls in relation to the existing surrounding height controls



Aerial view looking west showing the proposed CBD height controls in relation to the existing surrounding height controls

Existing Built Form and Approved Building Envelopes

Parramatta has undergone an extraordinary level of development over the past decade, and the need to reconsider the existing planning framework is well established to manage growth and achieve better urban outcomes.



Indicative Permissible Building Envelopes - DPE Modelling

In order to understand the possible built form outcomes, DPE has undertaken preliminary design modelling to understand the potential maximum building envelopes that would be permissible under this Planning Proposal.

This model forms a reference that sits within the proposed planning envelopes.

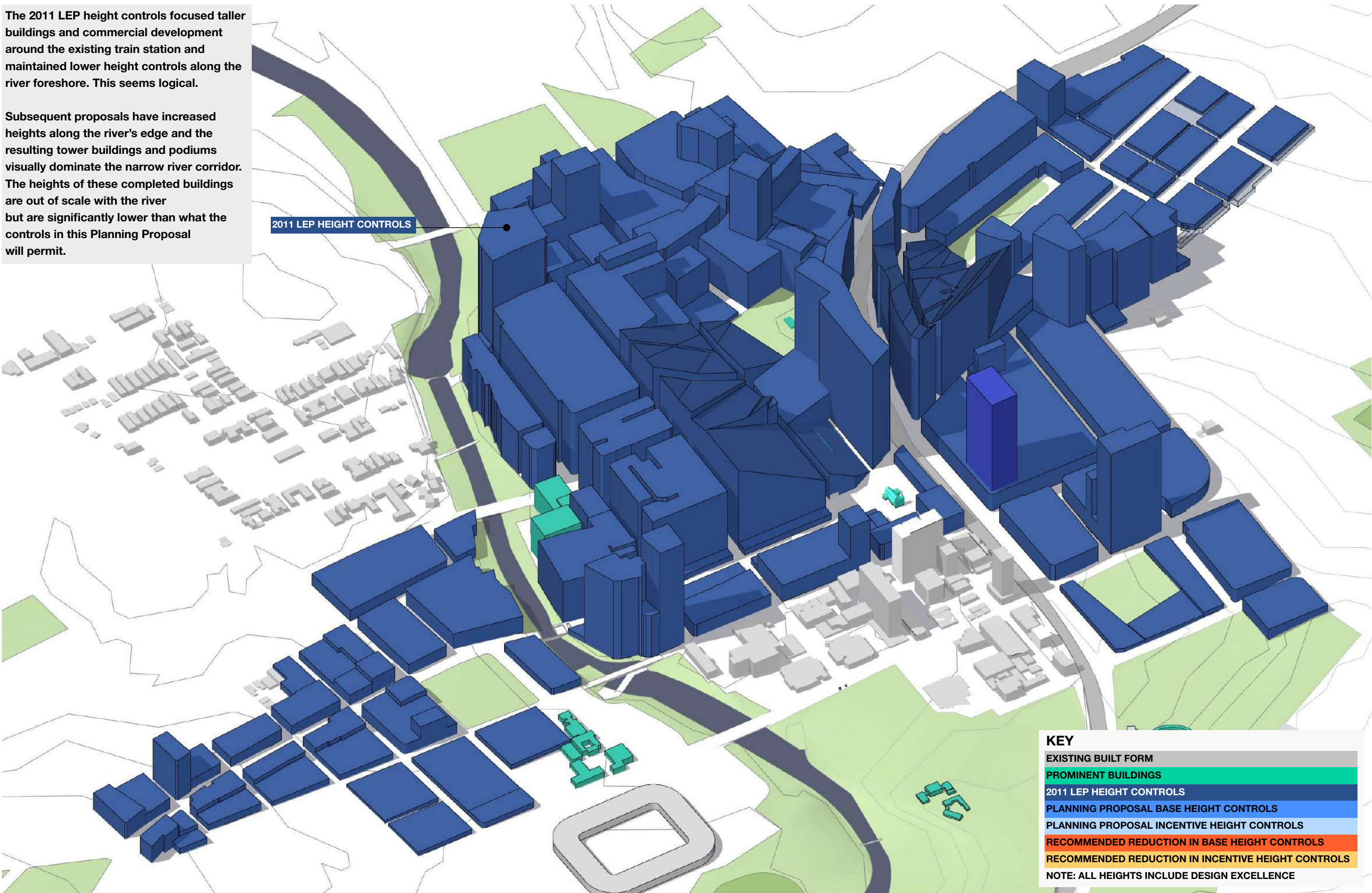
The focus of this investigation was areas north of the existing rail alignment including the commercial core, the Parramatta river foreshore areas and Church Street north. The model does not include indicative development for Aird and Campbell Street or Auto Alley.



2011 LEP Height Controls and Approved Building Envelopes

The 2011 LEP height controls focused taller buildings and commercial development around the existing train station and maintained lower height controls along the river foreshore. This seems logical.

Subsequent proposals have increased heights along the river's edge and the resulting tower buildings and podiums visually dominate the narrow river corridor. The heights of these completed buildings are out of scale with the river but are significantly lower than what the controls in this Planning Proposal will permit.

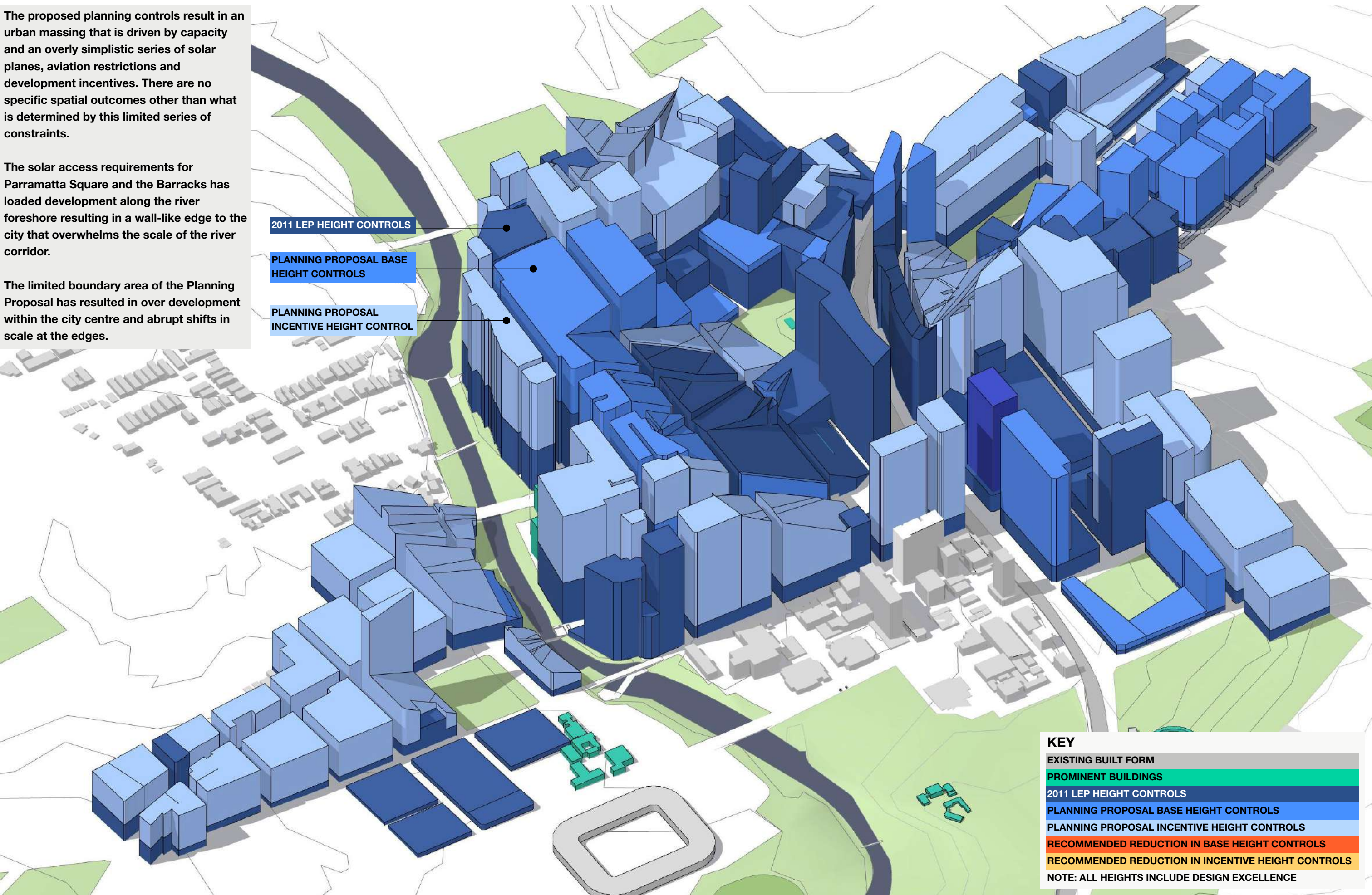


Planning Proposal Base and Incentive Height Controls

The proposed planning controls result in an urban massing that is driven by capacity and an overly simplistic series of solar planes, aviation restrictions and development incentives. There are no specific spatial outcomes other than what is determined by this limited series of constraints.

The solar access requirements for Parramatta Square and the Barracks has loaded development along the river foreshore resulting in a wall-like edge to the city that overwhelms the scale of the river corridor.

The limited boundary area of the Planning Proposal has resulted in over development within the city centre and abrupt shifts in scale at the edges.

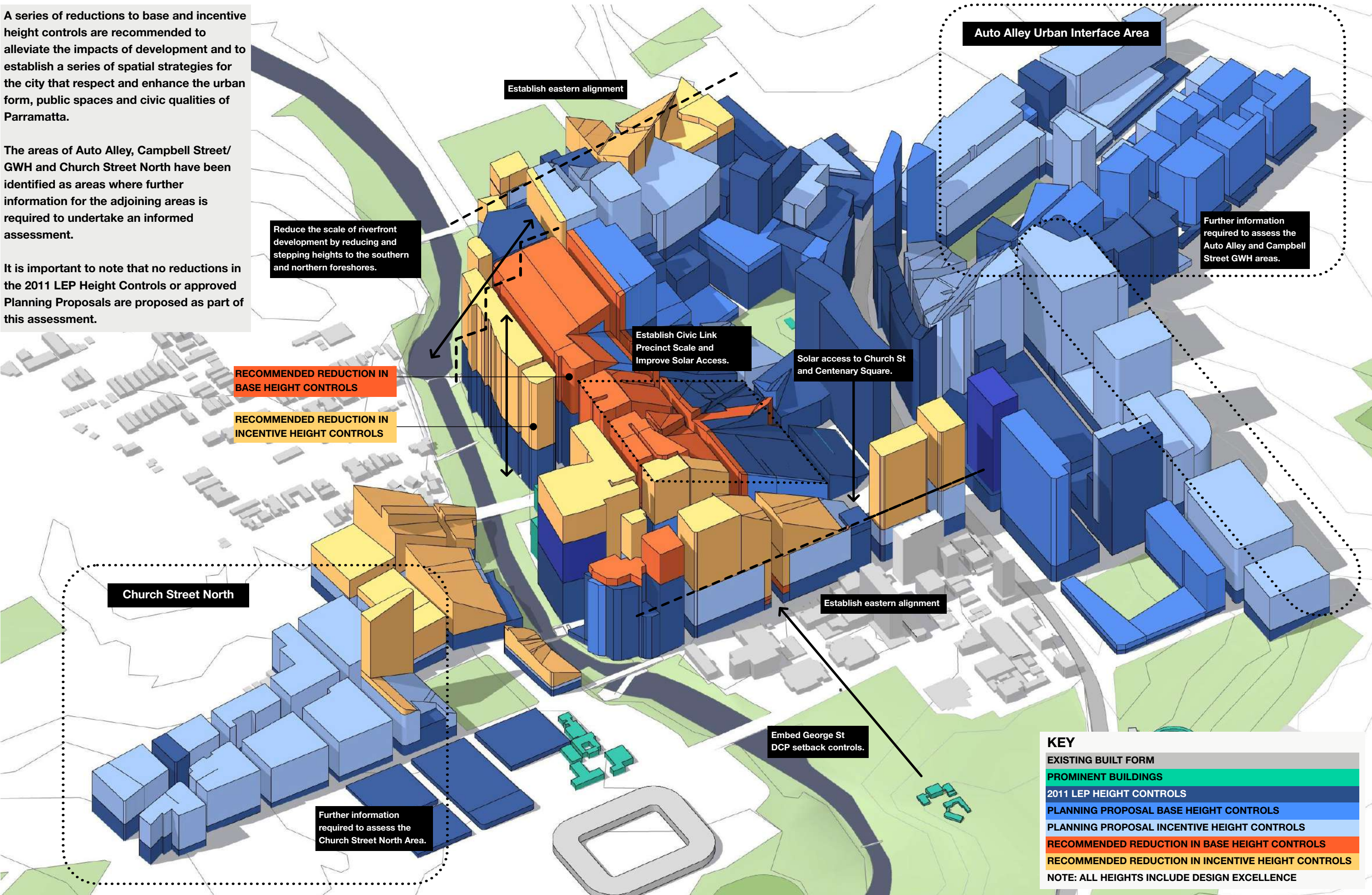


Recommended Reductions in Planning Proposal Height Controls

A series of reductions to base and incentive height controls are recommended to alleviate the impacts of development and to establish a series of spatial strategies for the city that respect and enhance the urban form, public spaces and civic qualities of Parramatta.

The areas of Auto Alley, Campbell Street/ GWH and Church Street North have been identified as areas where further information for the adjoining areas is required to undertake an informed assessment.

It is important to note that no reductions in the 2011 LEP Height Controls or approved Planning Proposals are proposed as part of this assessment.

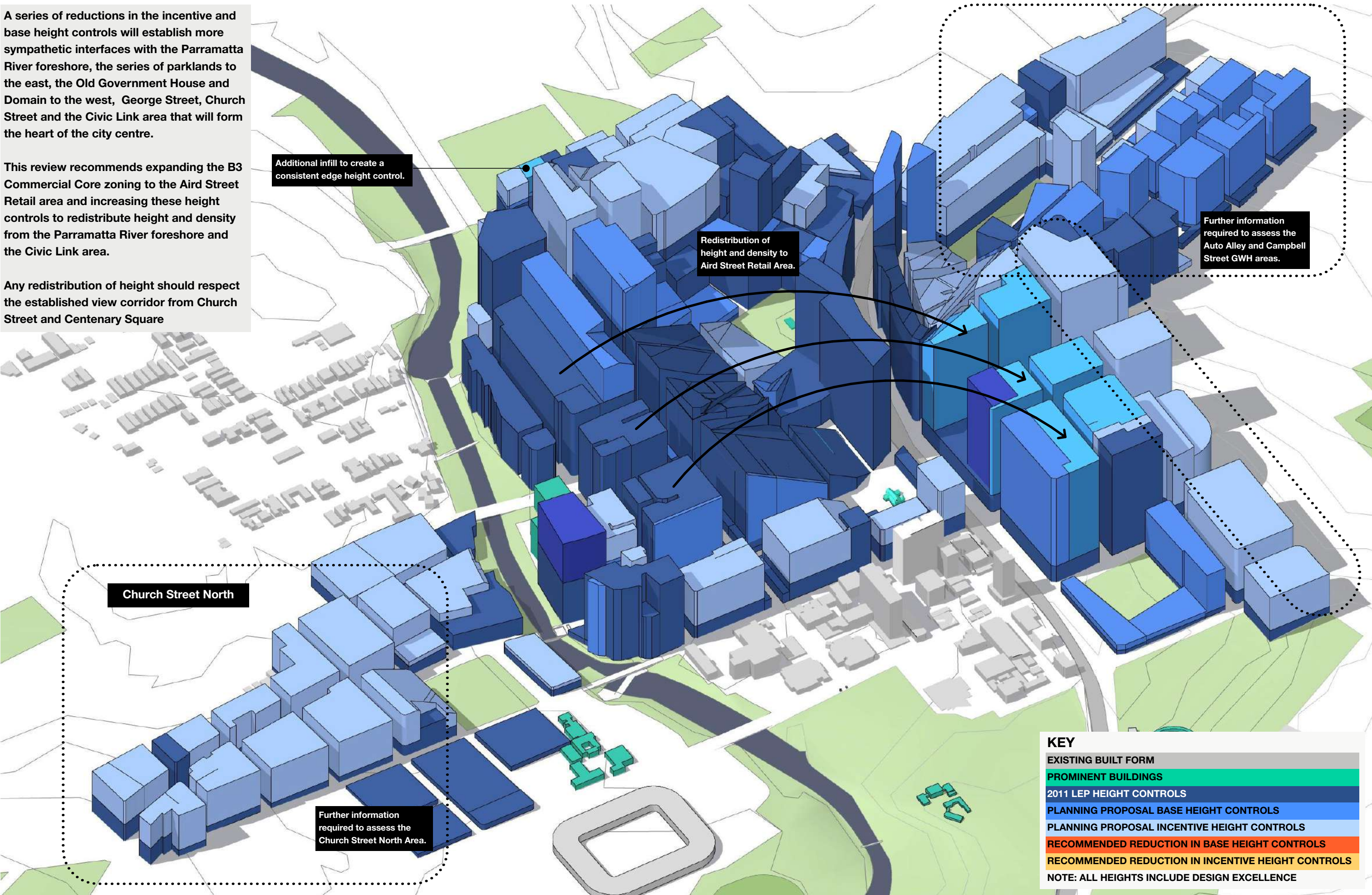


Recommended Height Controls and Redistributed Density

A series of reductions in the incentive and base height controls will establish more sympathetic interfaces with the Parramatta River foreshore, the series of parklands to the east, the Old Government House and Domain to the west, George Street, Church Street and the Civic Link area that will form the heart of the city centre.

This review recommends expanding the B3 Commercial Core zoning to the Aird Street Retail area and increasing these height controls to redistribute height and density from the Parramatta River foreshore and the Civic Link area.

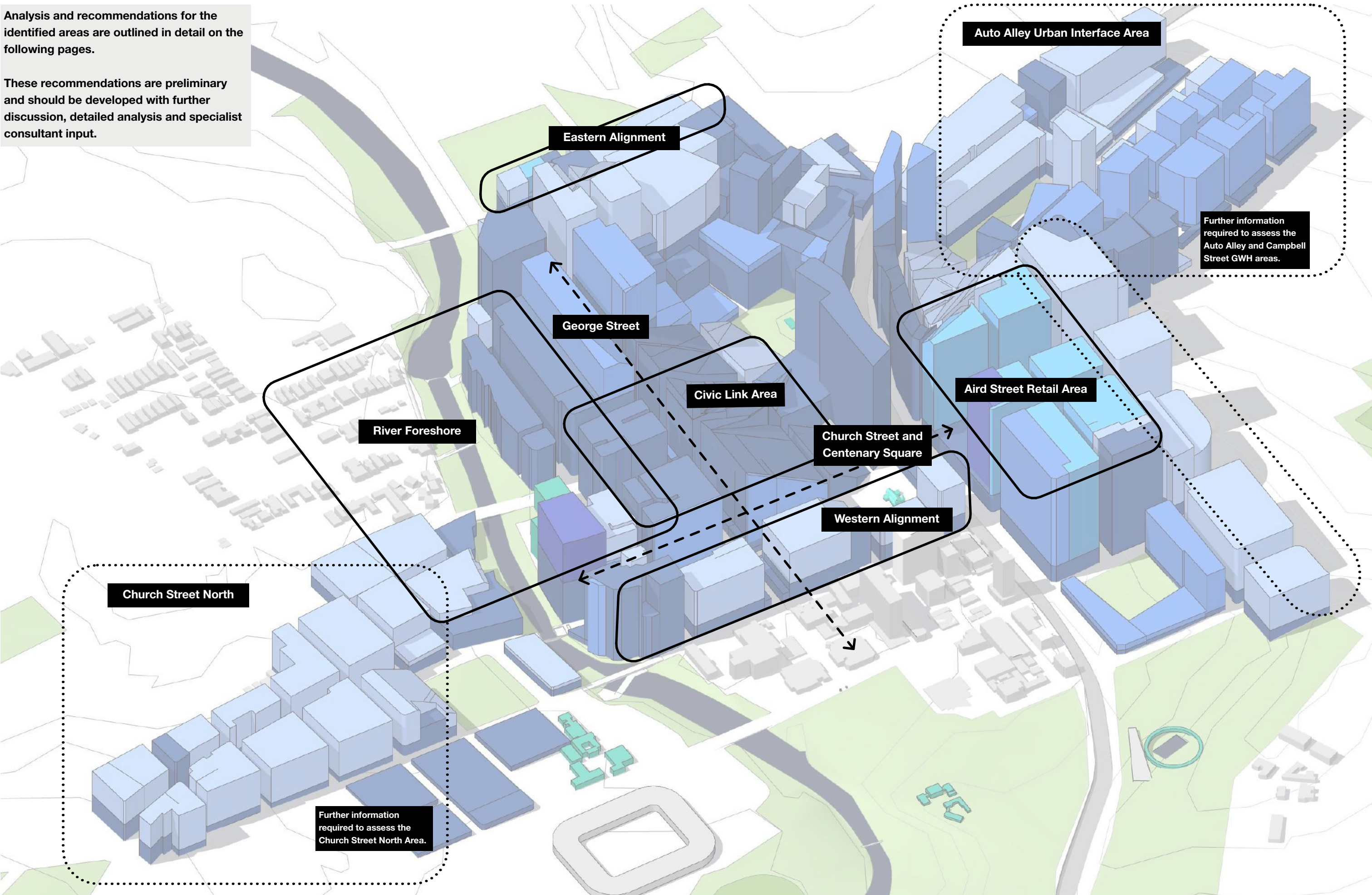
Any redistribution of height should respect the established view corridor from Church Street and Centenary Square



Detailed Review Areas

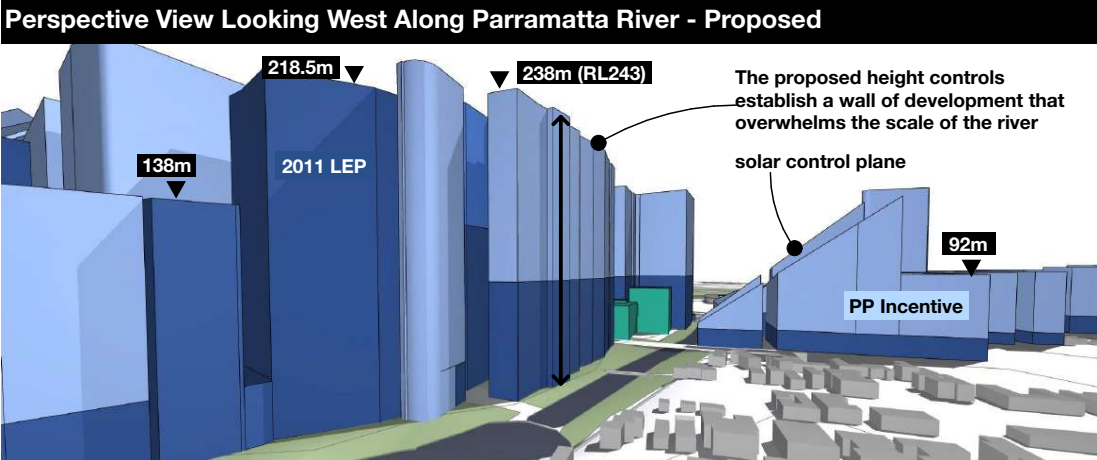
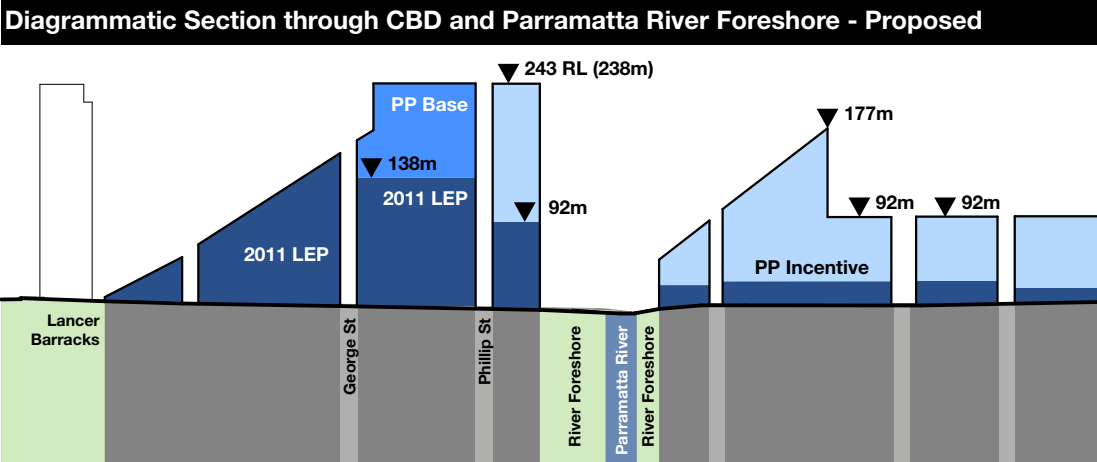
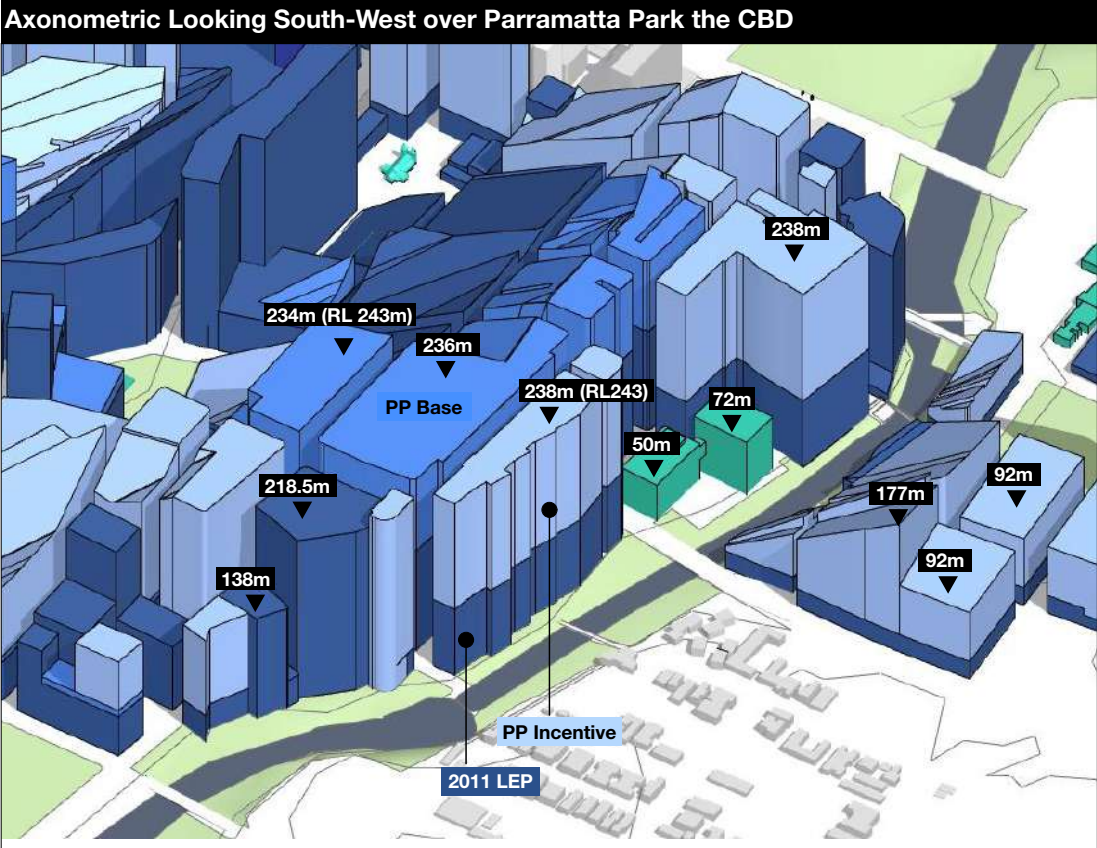
Analysis and recommendations for the identified areas are outlined in detail on the following pages.

These recommendations are preliminary and should be developed with further discussion, detailed analysis and specialist consultant input.

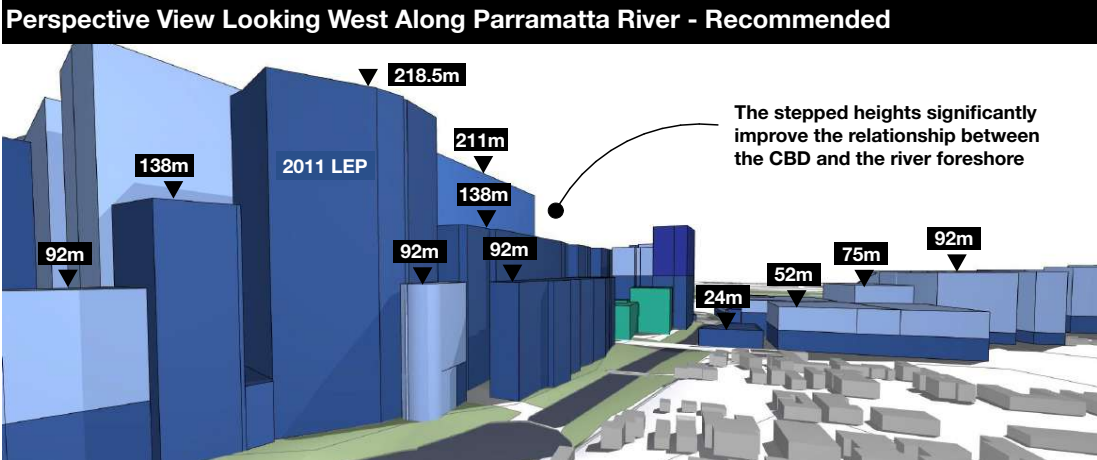
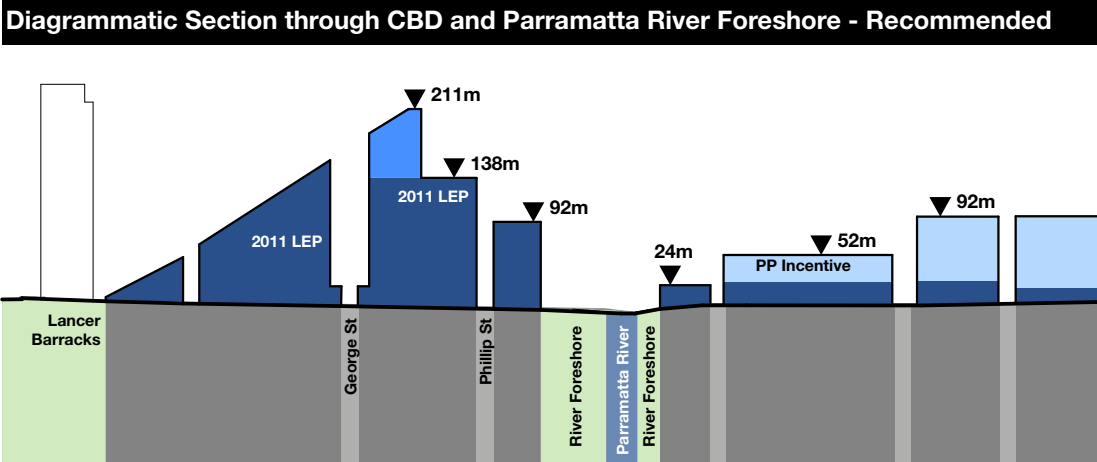
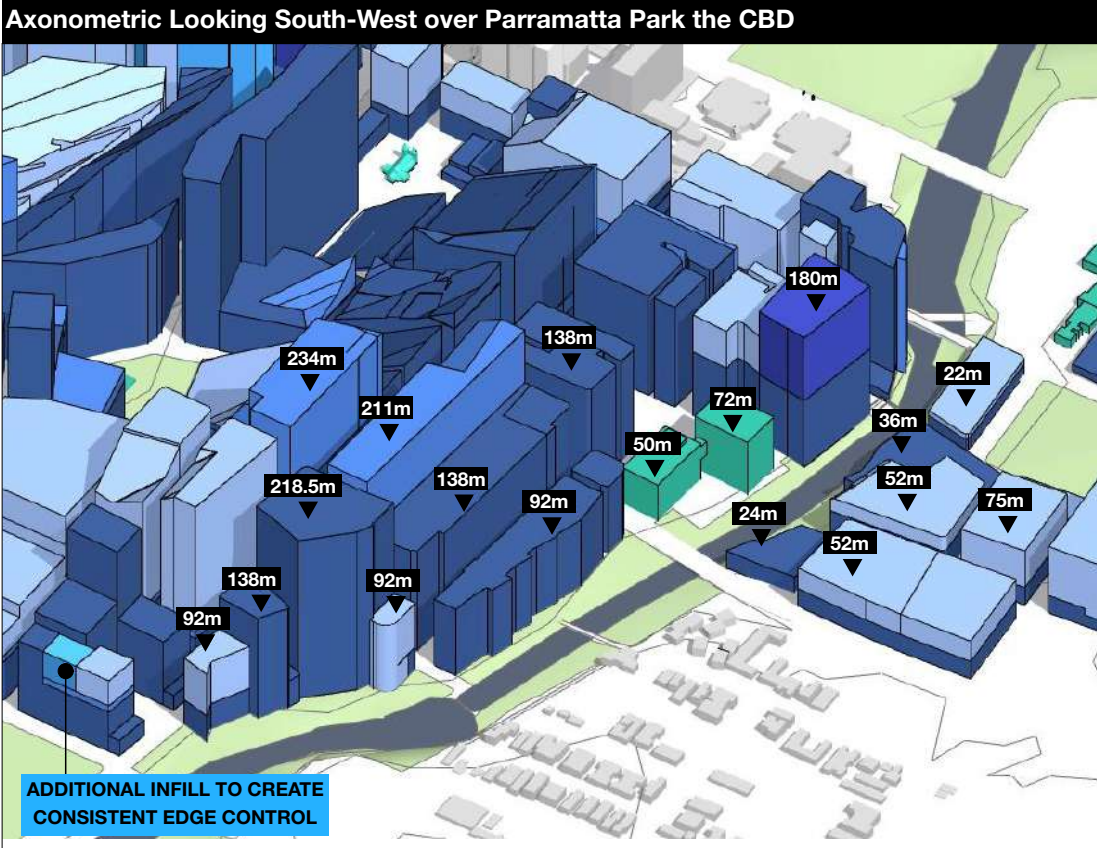


River Foreshore

Planning Proposal Height Controls



Recommended Height Controls



Observations

Parramatta has a unique relationship with its river and the current Planning Proposal risks jeopardising this relationship for future generations.

The proposed controls for height incentives, opportunity sites, and the solar access controls for Parramatta Square have loaded height on the southern edge of the Parramatta River foreshore. The resulting massing controls could result in urban form that overwhelms the river that is so central to its landscape and history. It would impact Parramatta's identity, and its desirability as a place to live and work.

The relationships between the recently completed tall buildings and the river is unconvincing. They appear to commercialise the foreshore and visually dominate the river corridor. This type of development is similar to Southbank in Melbourne or Barangaroo in Sydney, and may not offer the most sensitive or place-specific response that Parramatta deserves.

The relationship between the Sydney CBD and its harbour, and Parramatta and its river, are substantially different in scale, aspect and siting, and yet the proposed controls encourage the same building typologies, heights and relationship to the water's edge. A ferry trip from Barangaroo to Parramatta is a stark reminder of the results of this approach and the extent to which the tall buildings in Parramatta are over-scaled in relation to the width of the river corridor.

Recommendations

As the metropolitan centre of the Central River City, the relationship between the river and the CBD will be critical to its future cultural identity. This relationship should be preserved and enhanced through a reconsideration of the proposed planning controls.

Any additional height or FSR (including incentives) allowed as part of this Planning Proposal should be removed to the sites along the southern foreshore.

The height plane controls to the north of the river should be reconsidered and consolidated to establish more consistent building heights that step down to the river to mitigate bulk, and maintain or improve solar access and sky views from the foreshore and Civic Link.

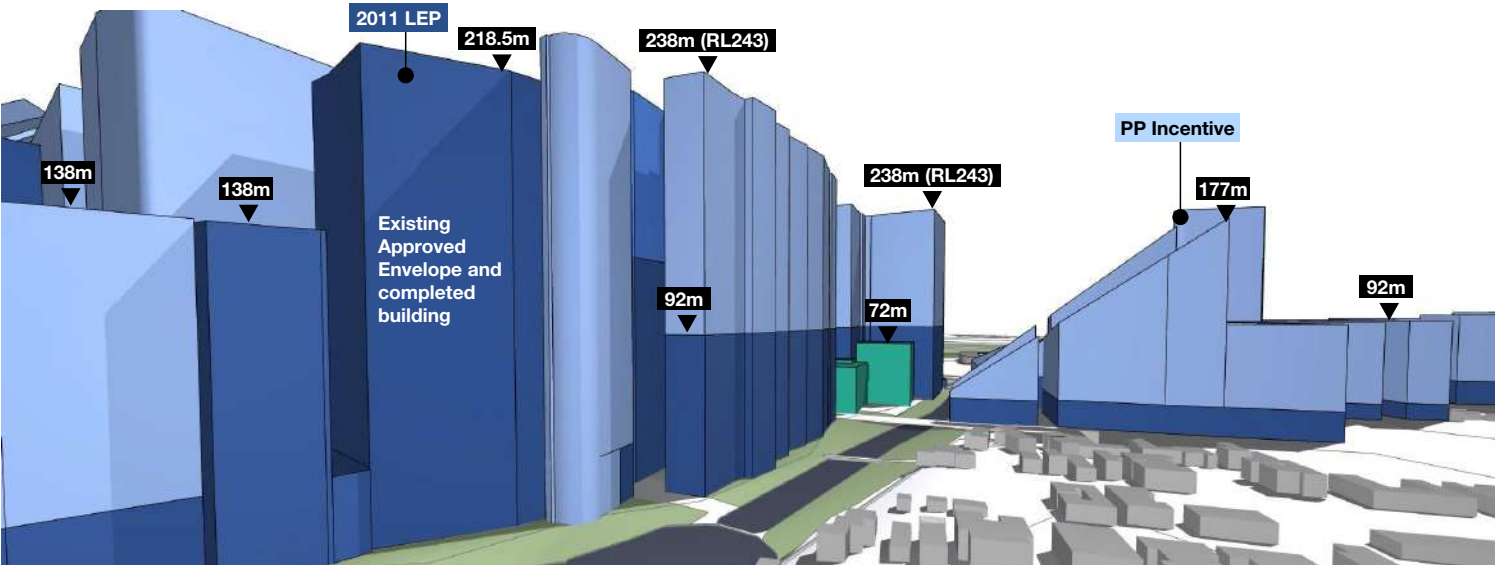
It will be vital to establish the most appropriate controls to strike the right balance from the outset to avoid repeating the mistakes that have already been made.

The permissible building envelopes should be commensurate with the scale of the river rather than a harbour.

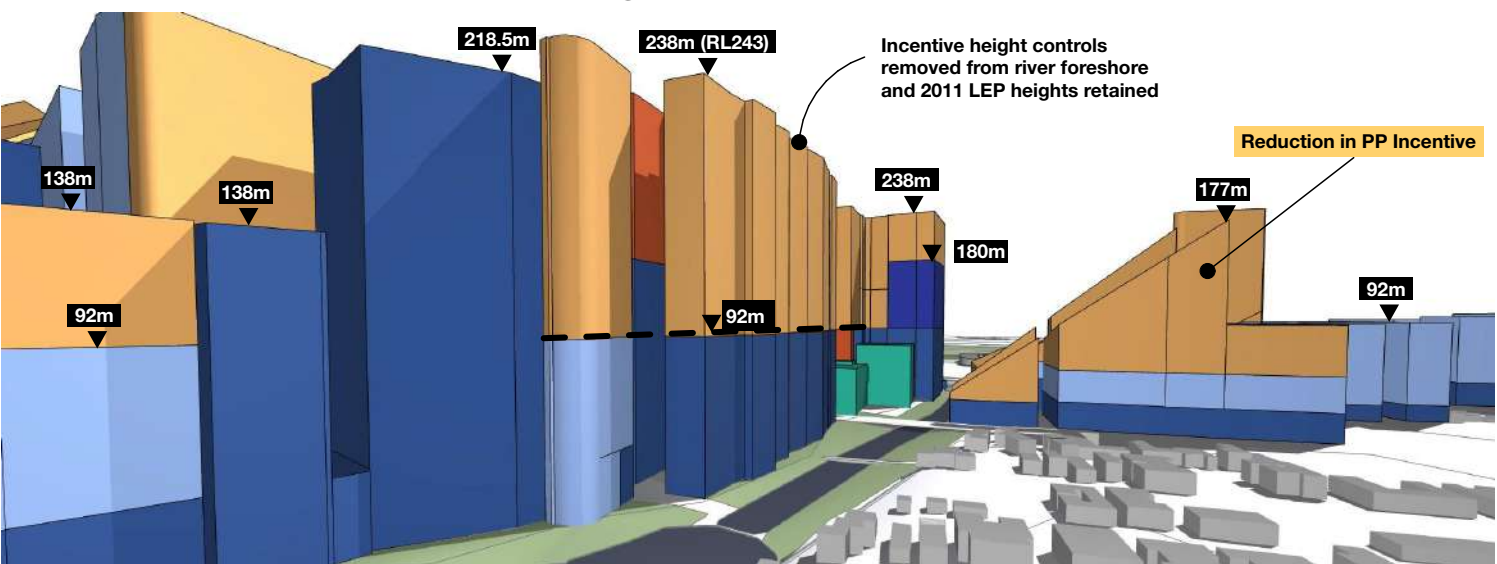
River Foreshore View Analysis

Perspective View Looking West Along Parramatta River

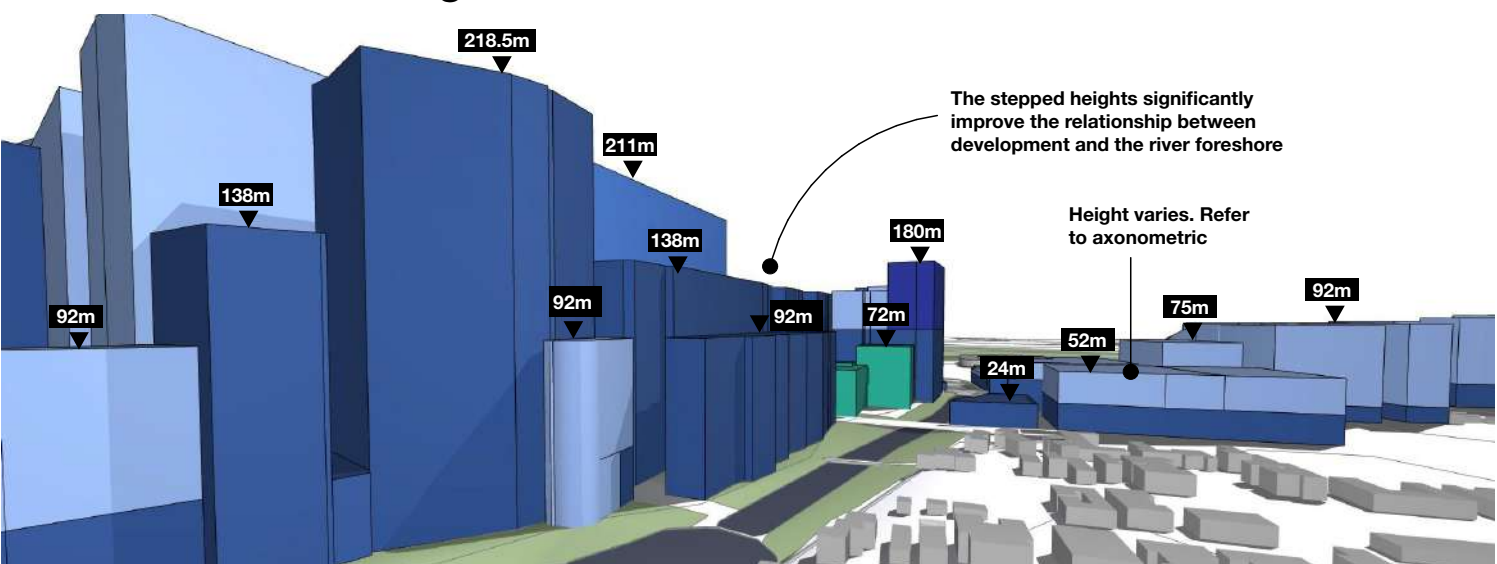
1. Planning Proposal Height Controls



2. Proposed Reductions in Height Controls



3. Recommended Height Controls

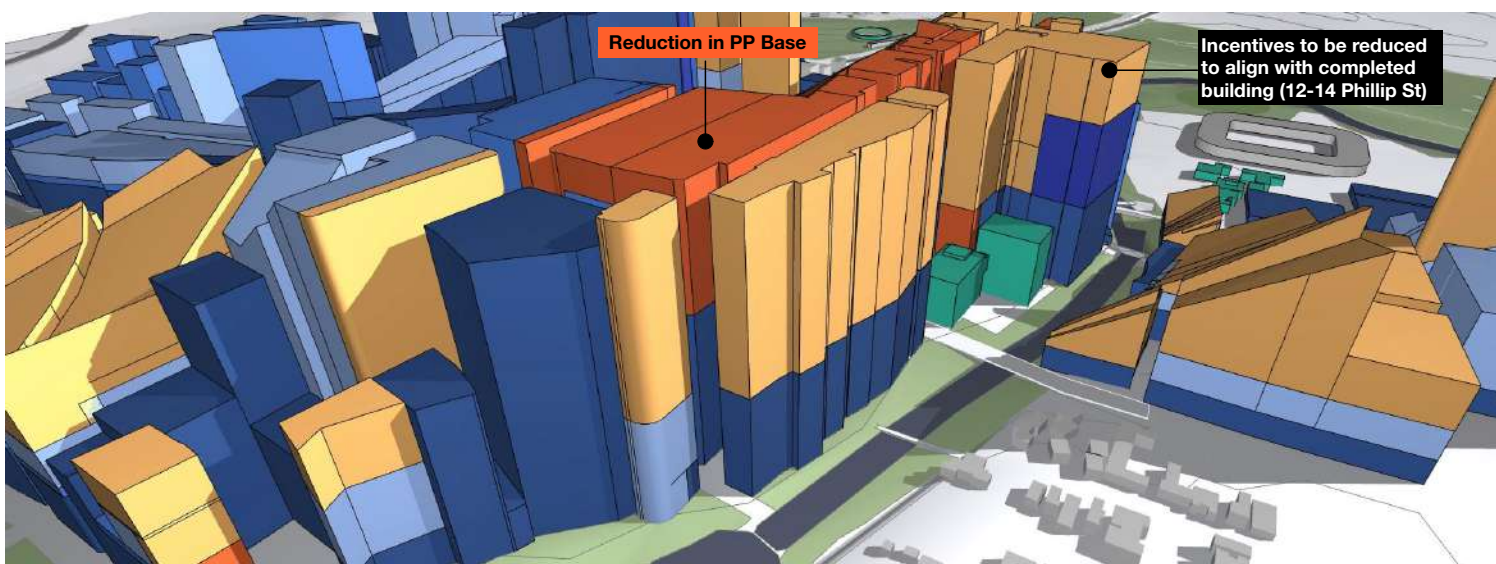


Aerial View Looking South-West Across Parramatta River

1. Planning Proposal Height Controls



2. Proposed Reductions in Height Controls



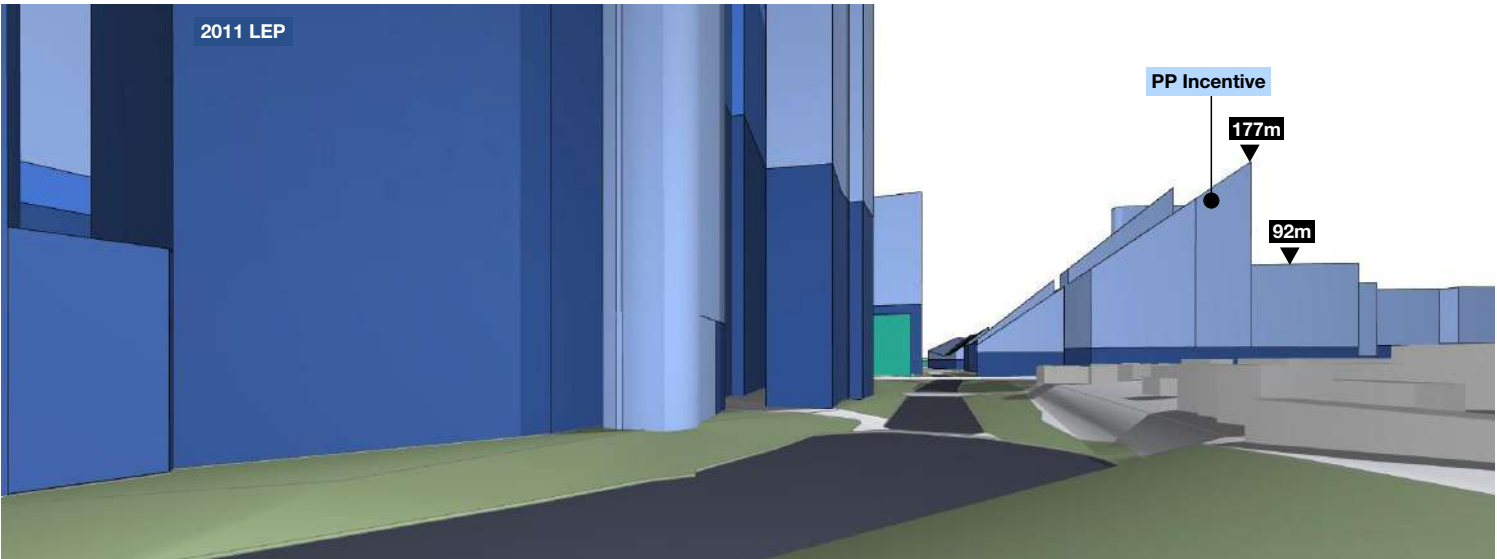
3. Recommended Height Controls



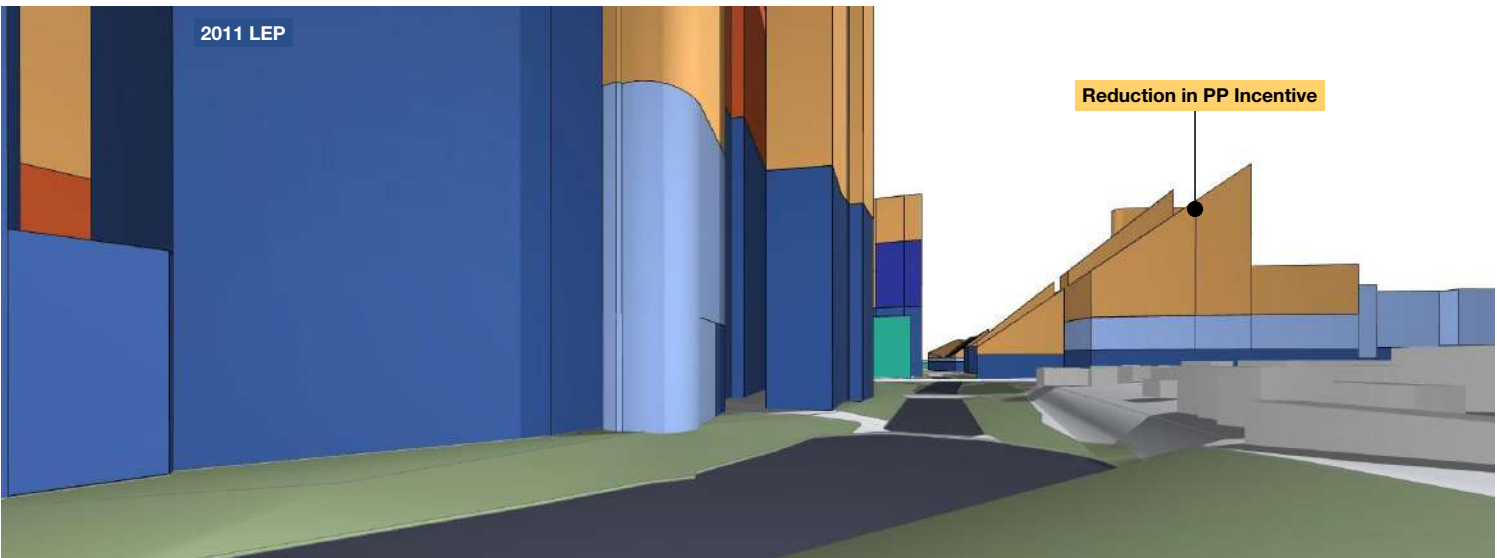
River Foreshore View Analysis

Perspective View Looking West Along Parramatta River

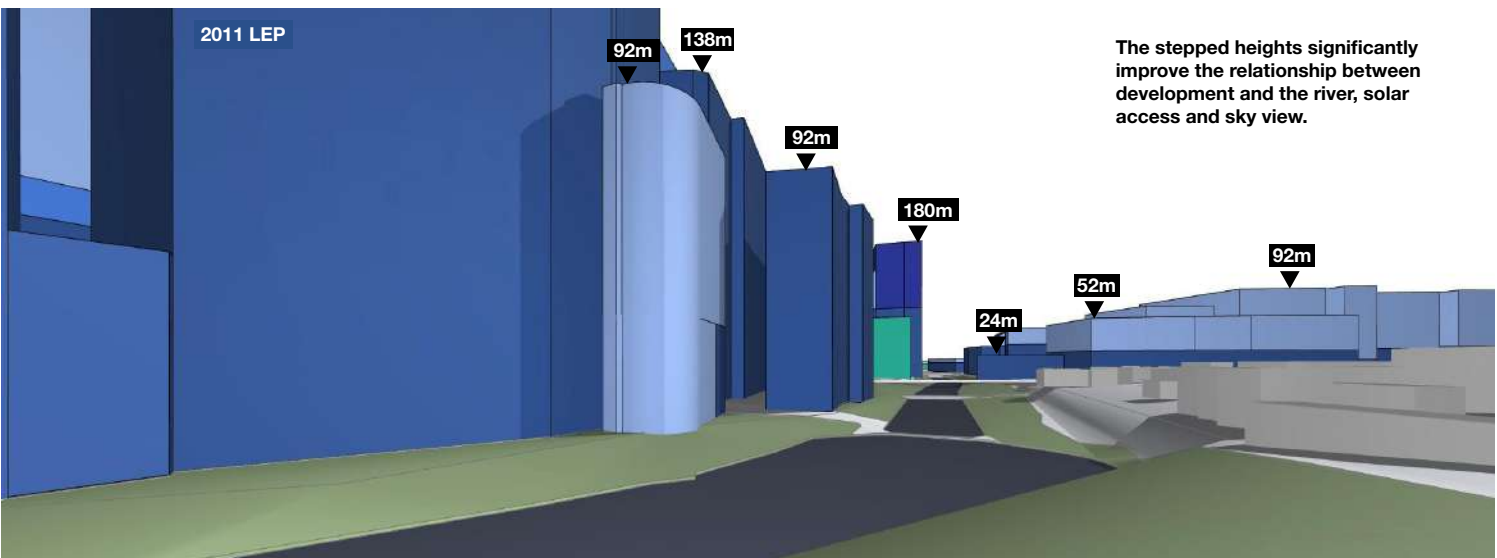
1. Planning Proposal Height Controls



2. Proposed Reductions in Height Controls

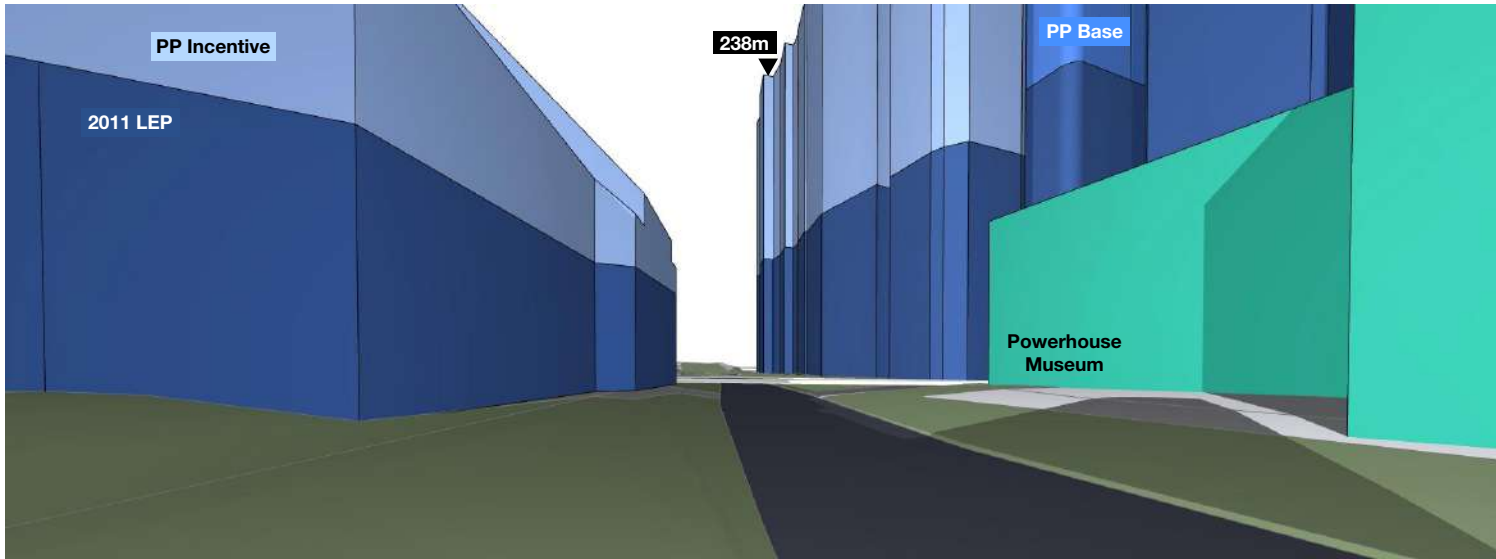


3. Recommended Height Controls



Perspective View Looking East Along Parramatta River

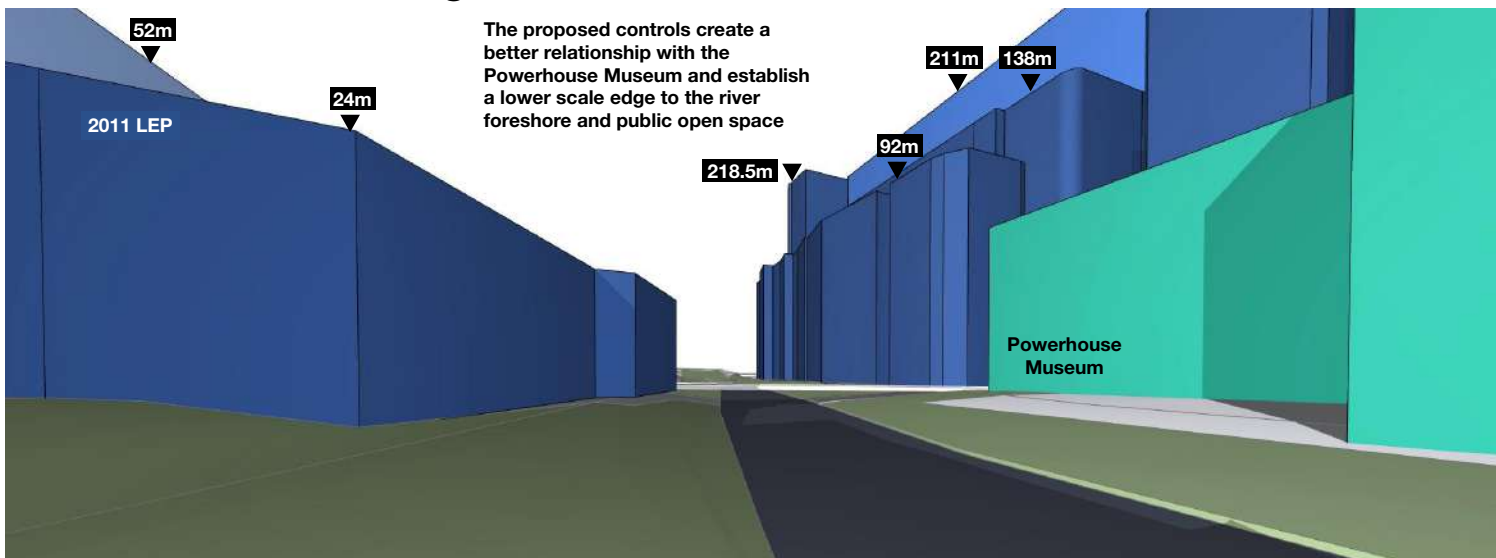
1. Planning Proposal Height Controls



2. Proposed Reductions in Height Controls

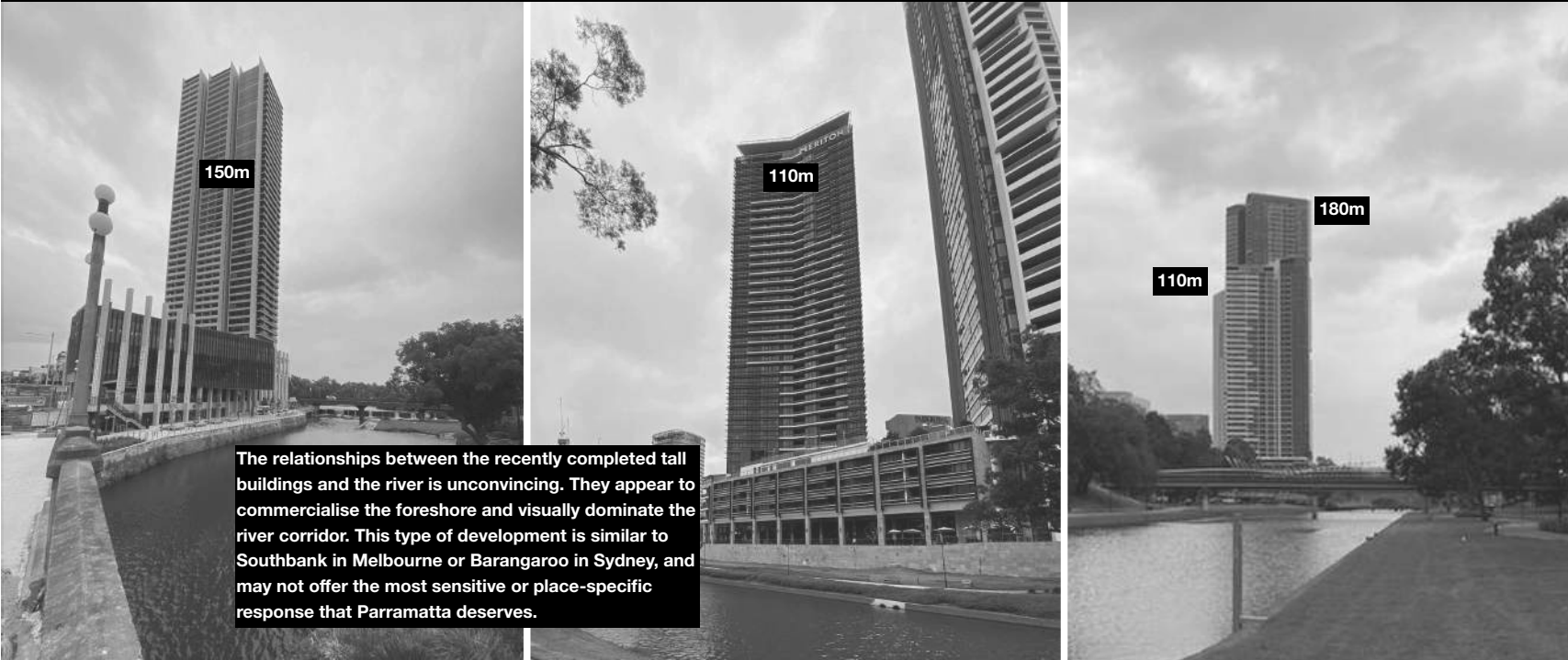


3. Recommended Height Controls

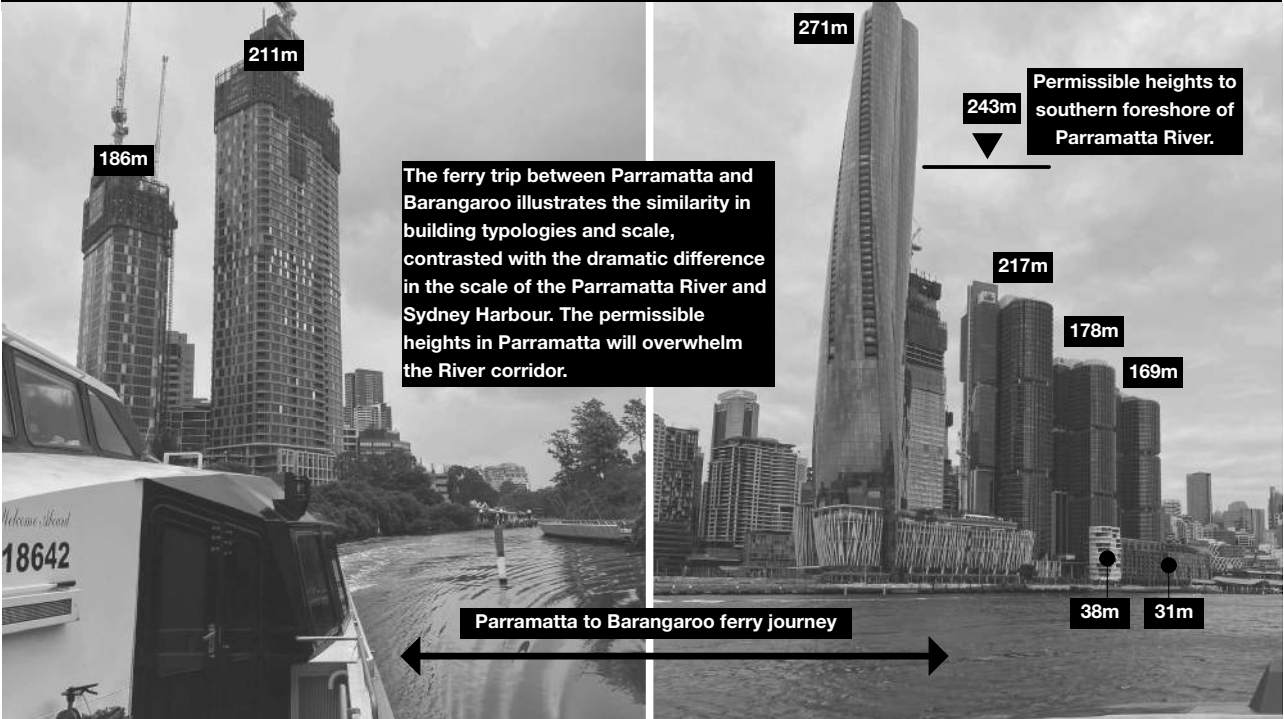


River Foreshore Site Visit and References

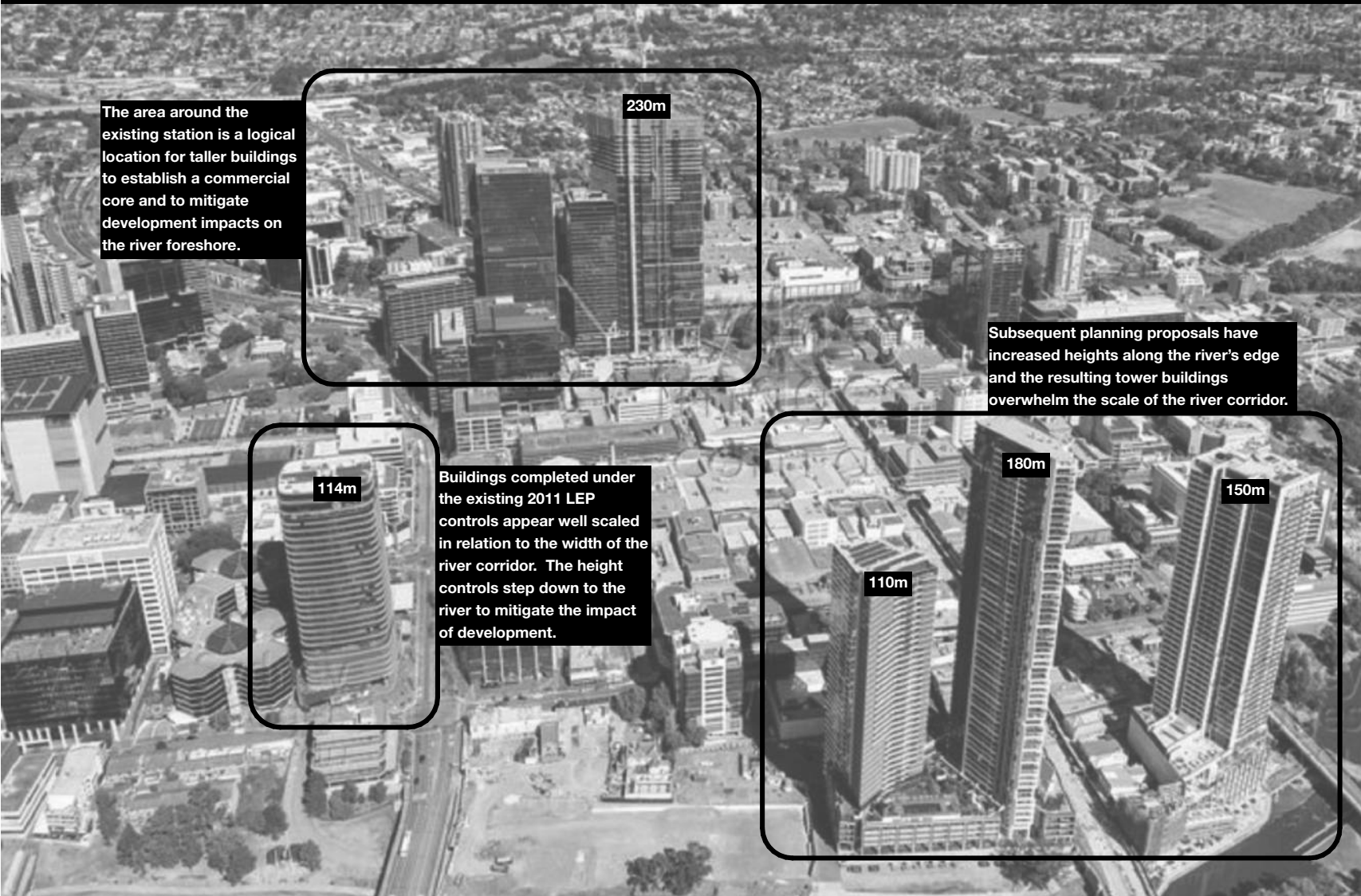
Views of recently completed buildings along the Parramatta Foreshore



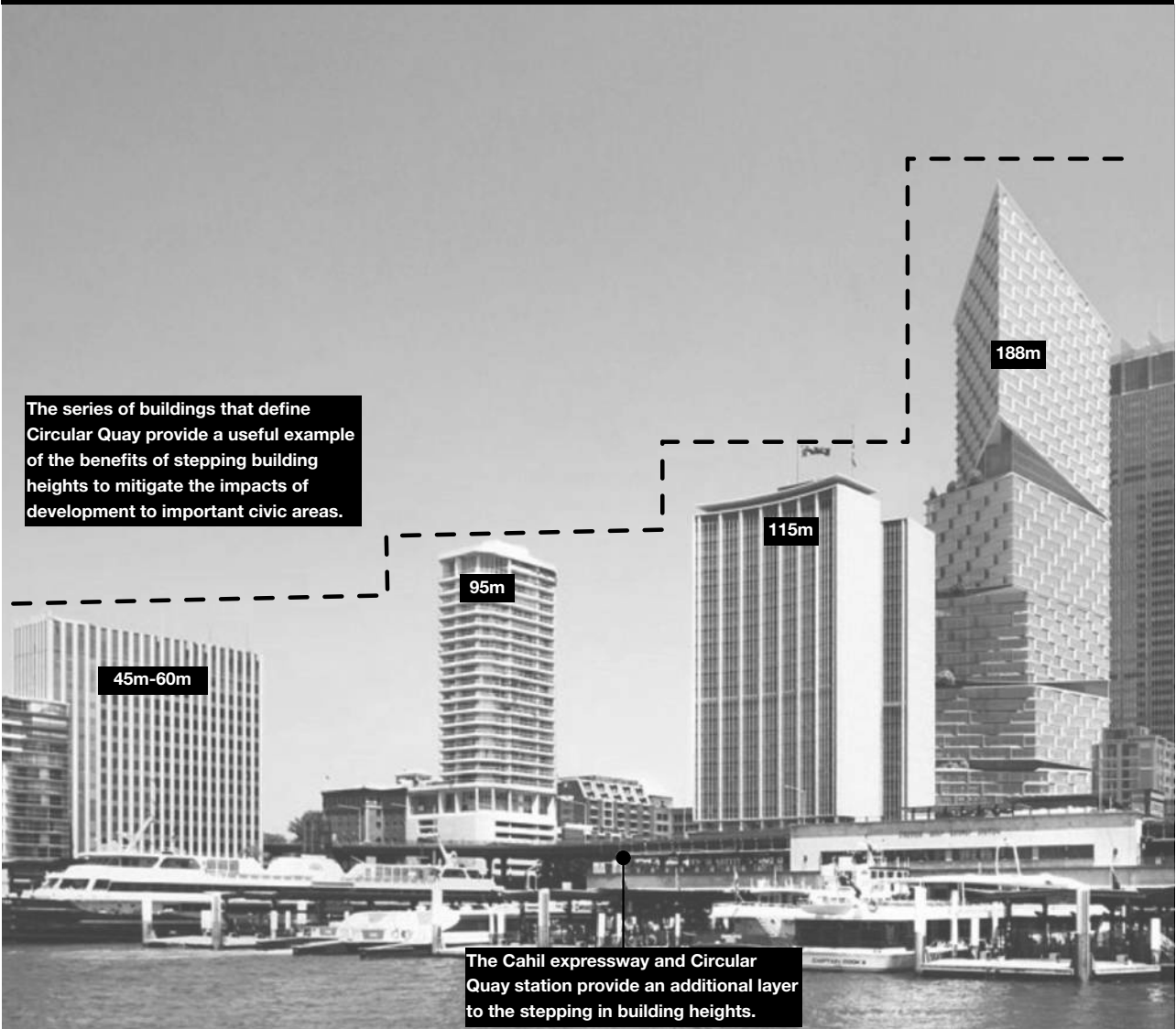
Comparison of development in relation to Parramatta River and Sydney Harbour



Aerial view looking south from Parramatta River to Parramatta Square

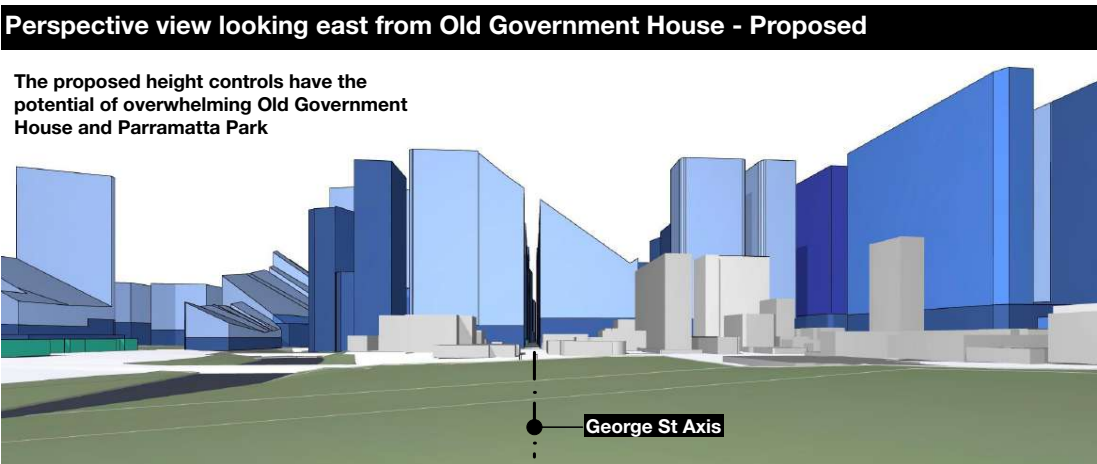
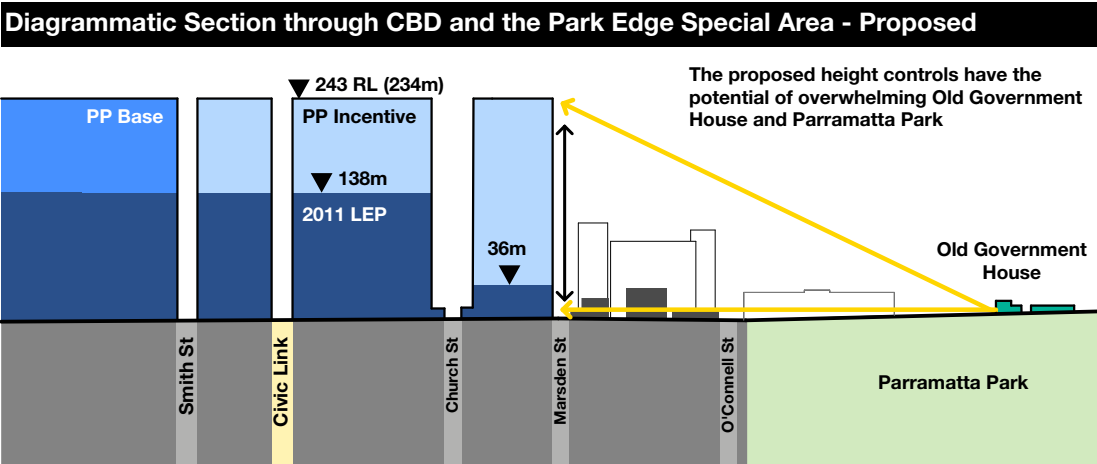
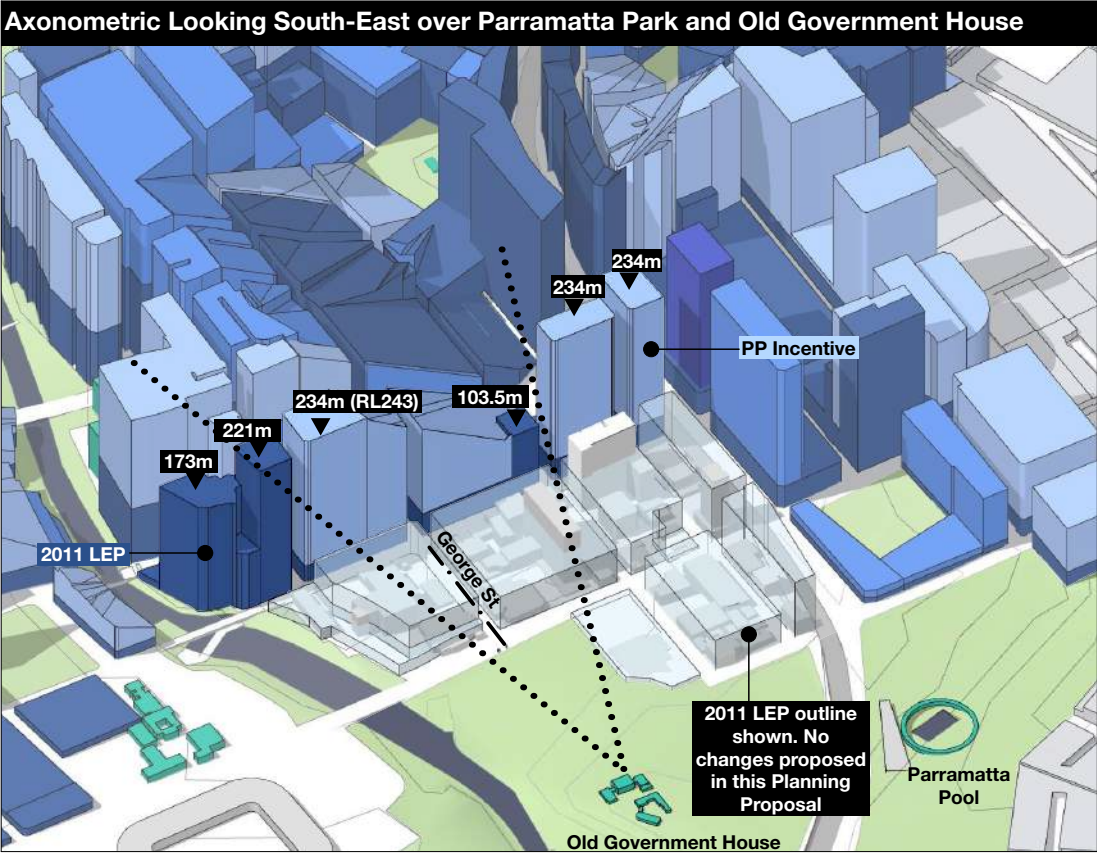


View looking South-East from Circular Quay

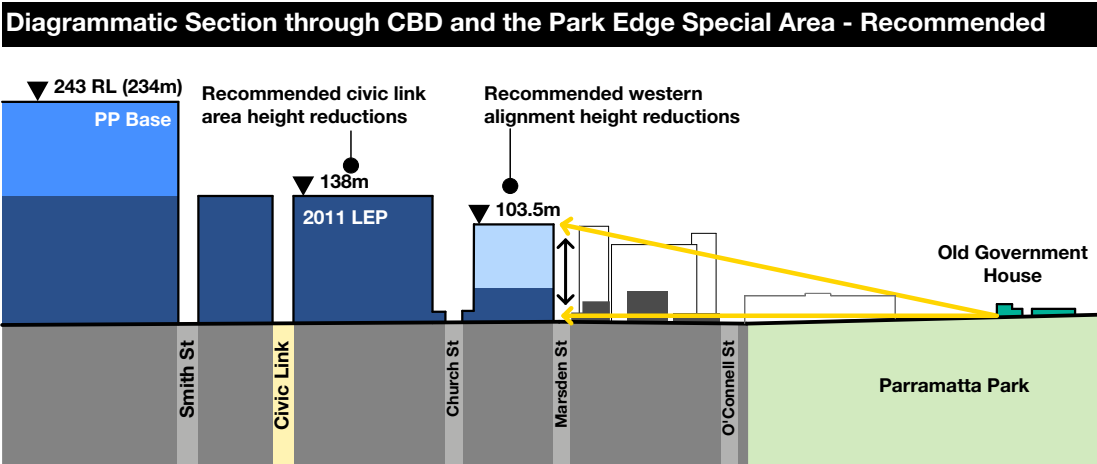
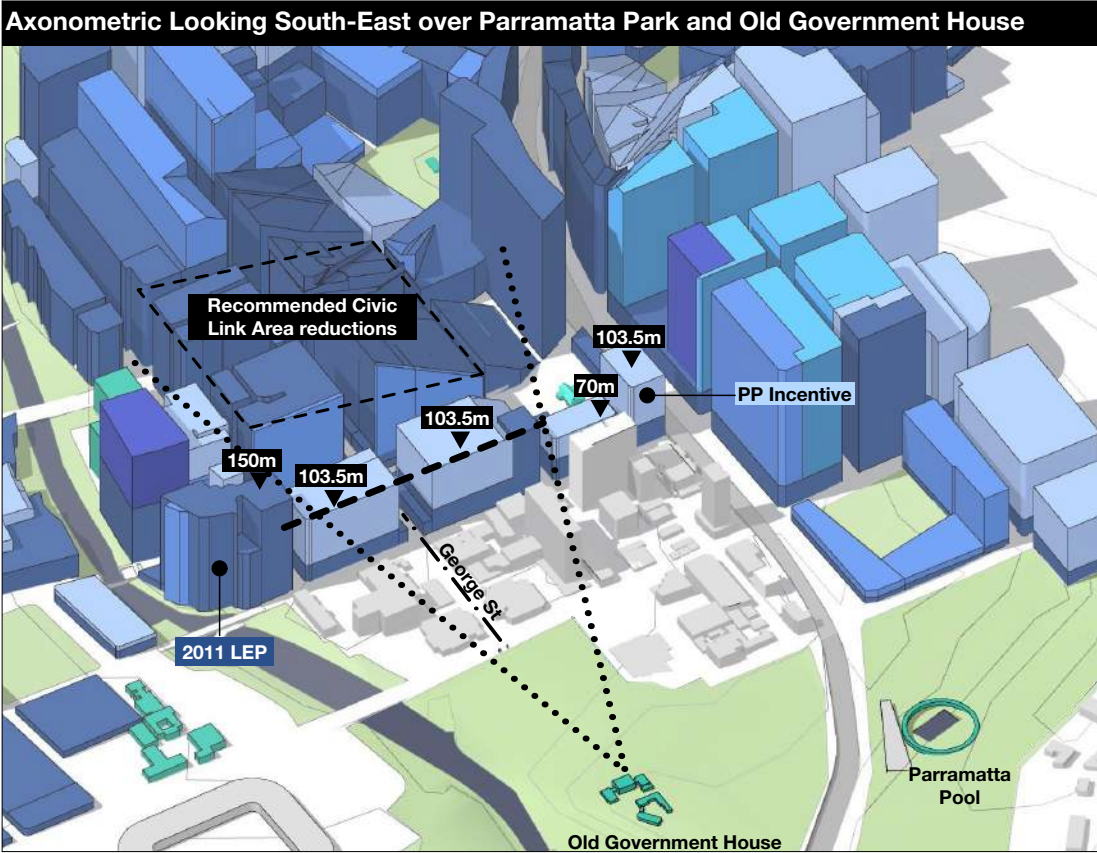


Western Alignment Summary

Planning Proposal Height Controls



Recommended Height Controls



Observations

The blocks between Marsden and Church Streets provide an important urban interface between the Parramatta CBD and the area to the west which includes the Justice Precinct, the world heritage listed Old Government House and Domain (OGHD), and Parramatta Park.

The proposed height controls between Marsden and Church St are defined by the maximum permissible height and the solar plane to Parramatta Square. The resulting forms appear as a simple cropped extrusion and establishes an abrupt, simplistic and unsympathetic interface with the adjoining area.

These blocks also contain a number of approved planning envelopes including a completed building at 150m on the riverfront that is visible when viewed from Old Government House.

As the existing completed buildings demonstrate, the proposed height controls have the potential to negatively impact the scale, character and significance of the Park Edge Special Area, OGHD and Parramatta Park.

Recommendations

Detailed controls should be developed for this alignment that mitigates the impacts of CBD development on the Park Edge Special Area, OGHD and Parramatta Park.

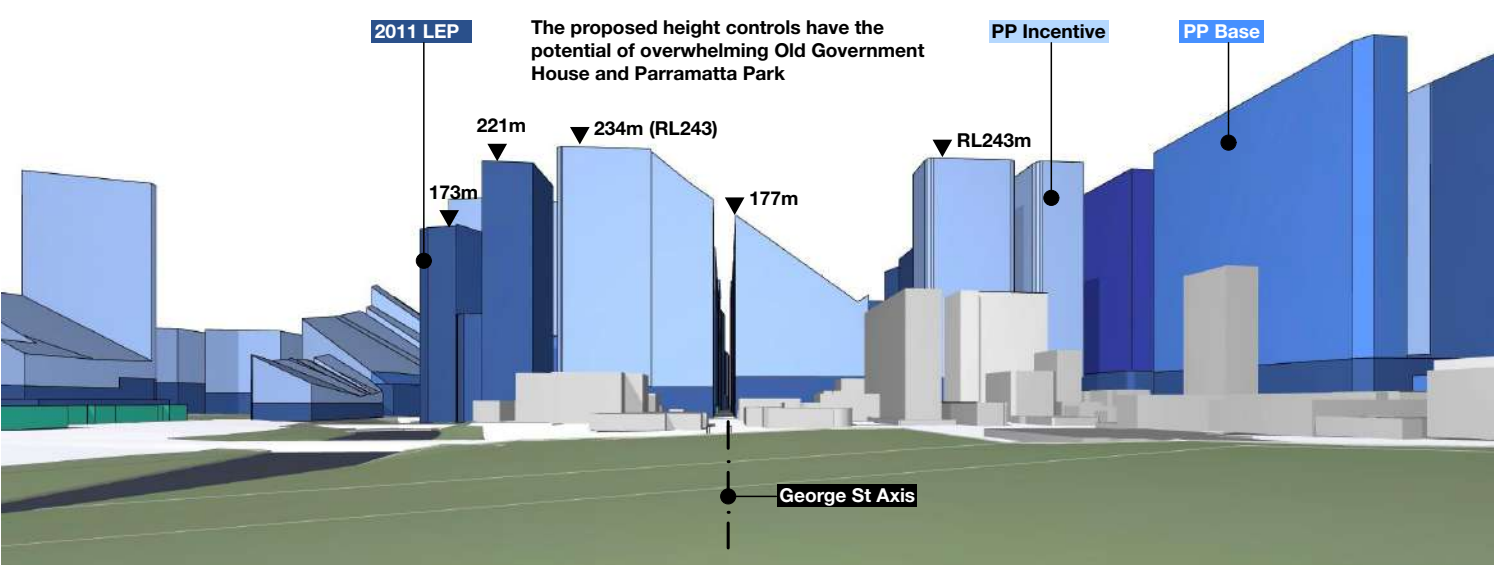
Where possible, the incentive height controls for the blocks between Marsden and Church Street should be reduced to create a transition in height between the sensitive areas to the west and future CBD development to the east. This transition in height should also be used to establish a consistent and legible urban edge to the commercial precinct.

For the two blocks between Marsden St, Church St, Phillip St and Macquarie St, the incentive height controls should be reduced to align with the approved planning proposal for 22 Macquarie Street to establish a height datum of 103.5m (inclusive of Design Excellence). The height controls south of Macquarie St should step down to 70m to increase solar access to Centenary Square and then step up to 103.5m to mediate the increased heights to the Aird Street Retail Area.

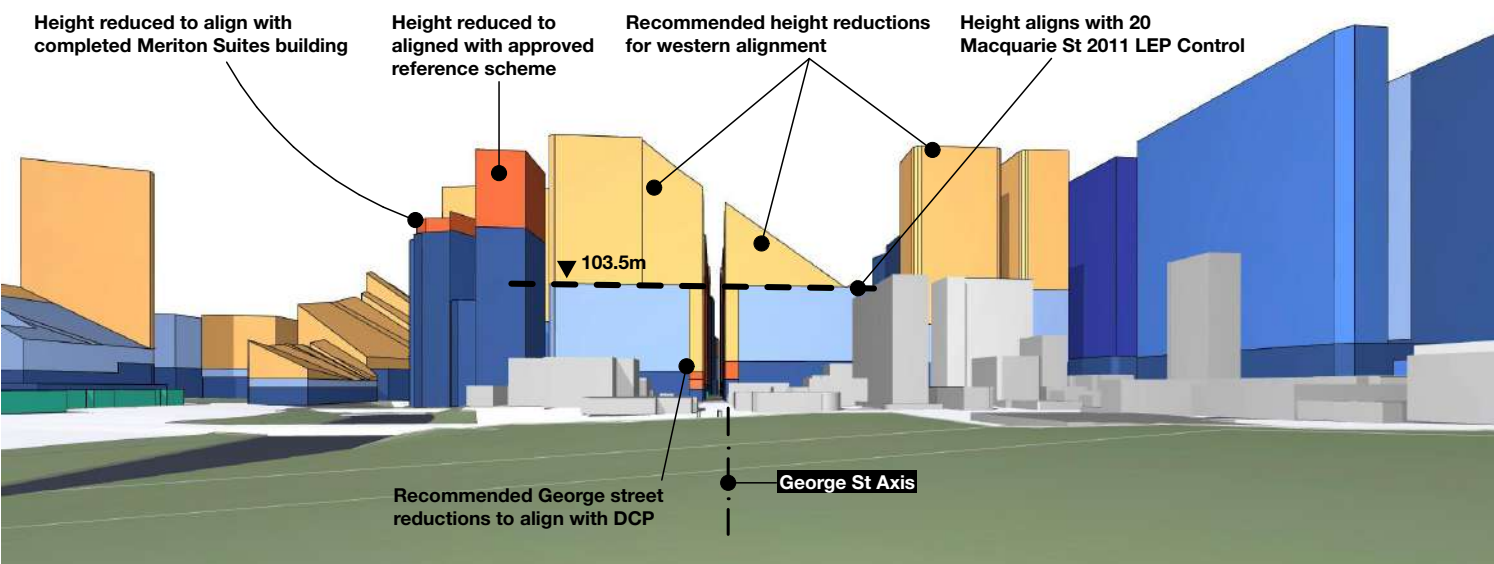
Western Alignment View Analysis

Perspective view looking east from Old Government House

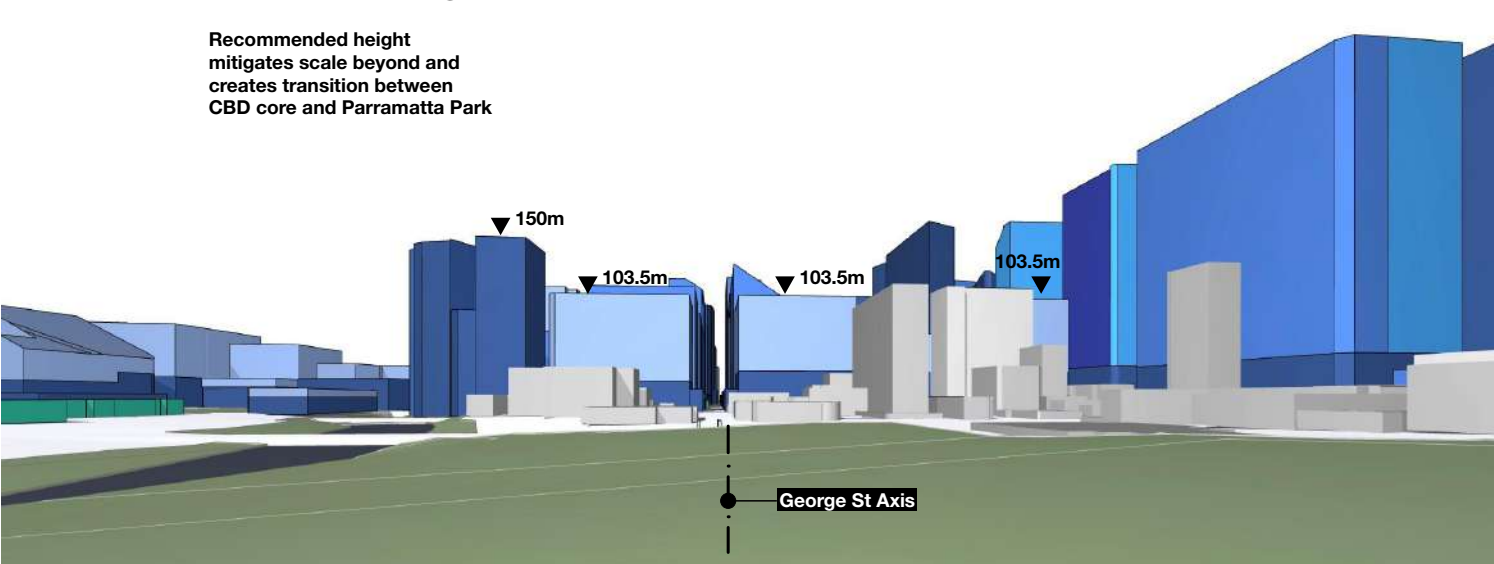
1. Planning Proposal Height Controls



2. Proposed Reductions in Height Controls

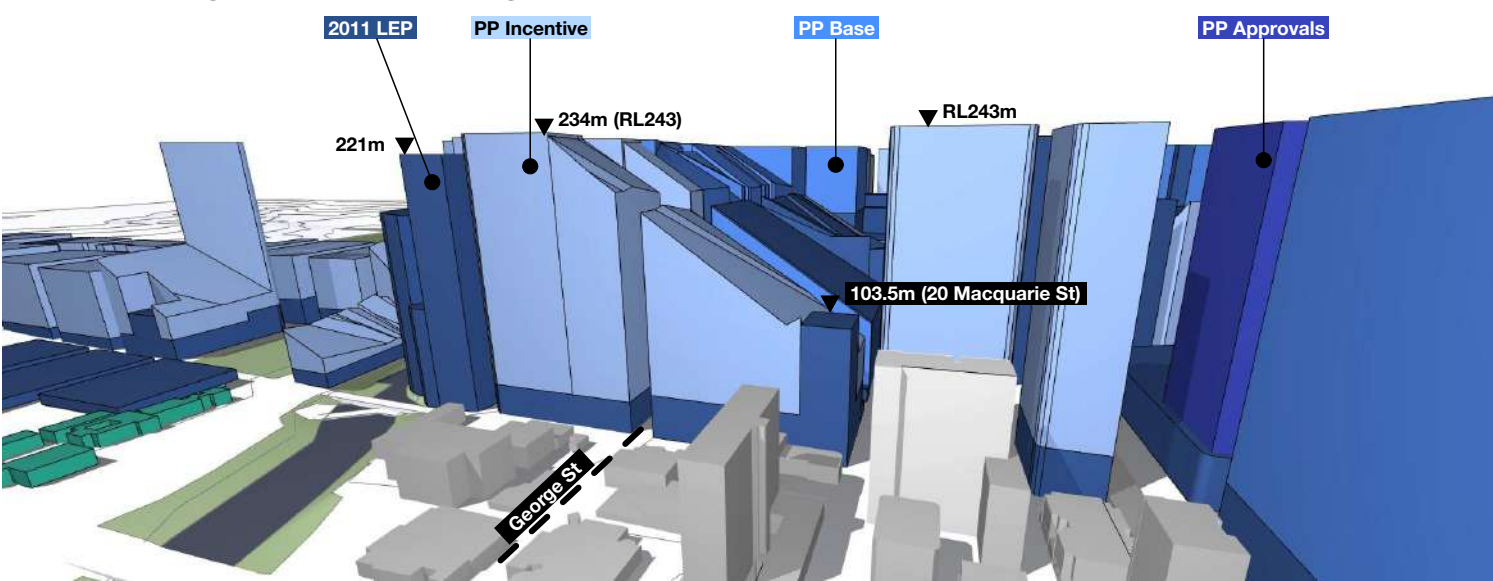


3. Recommended Height Controls

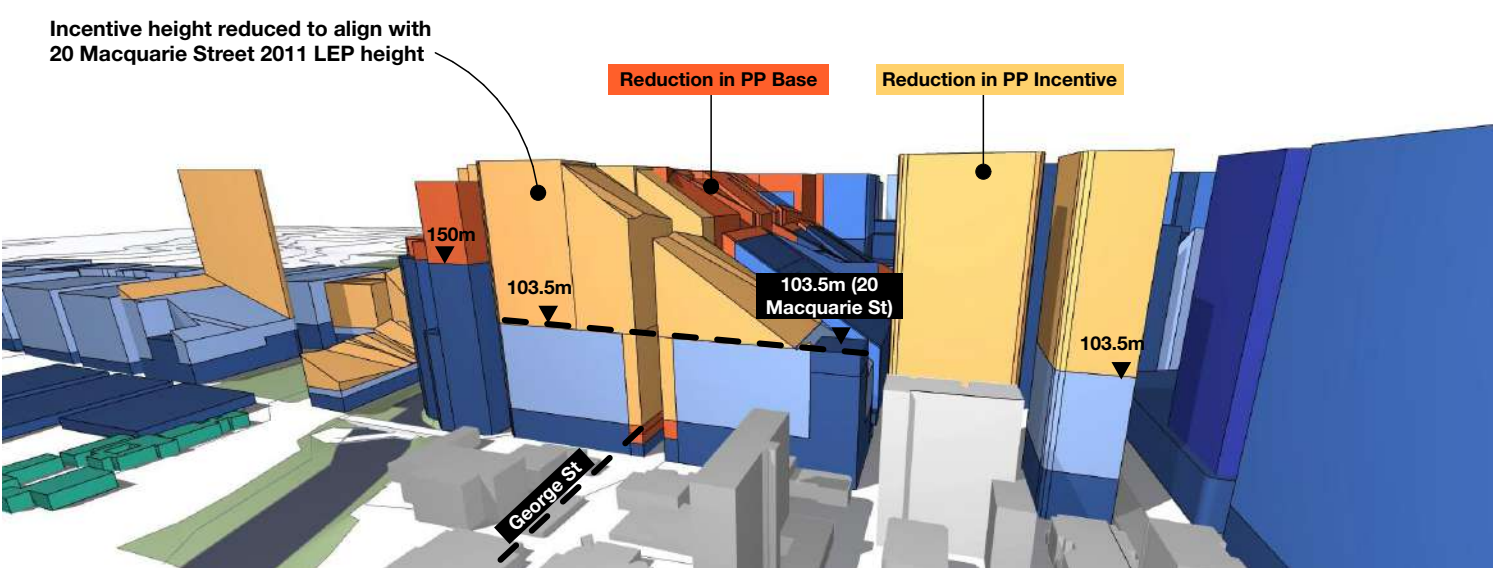


Perspective view looking east from Old Government House

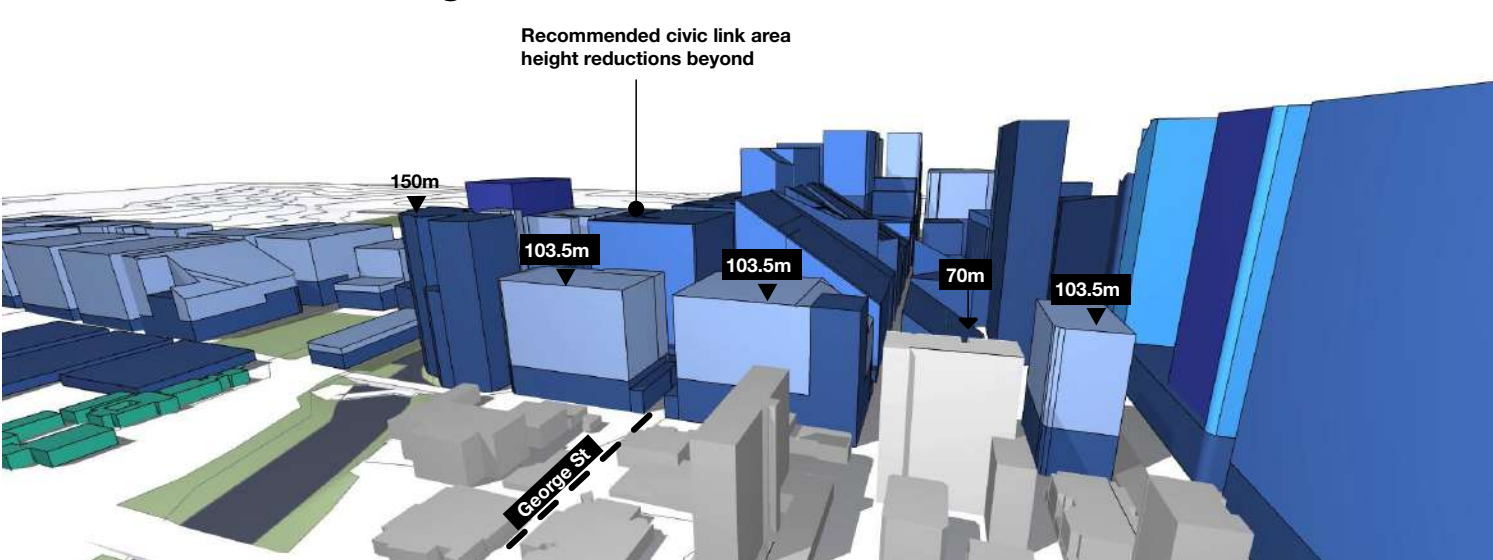
1. Planning Proposal Height Controls



2. Proposed Reductions in Height Controls



3. Recommended Height Controls



Urban Alignment Site Visit and References

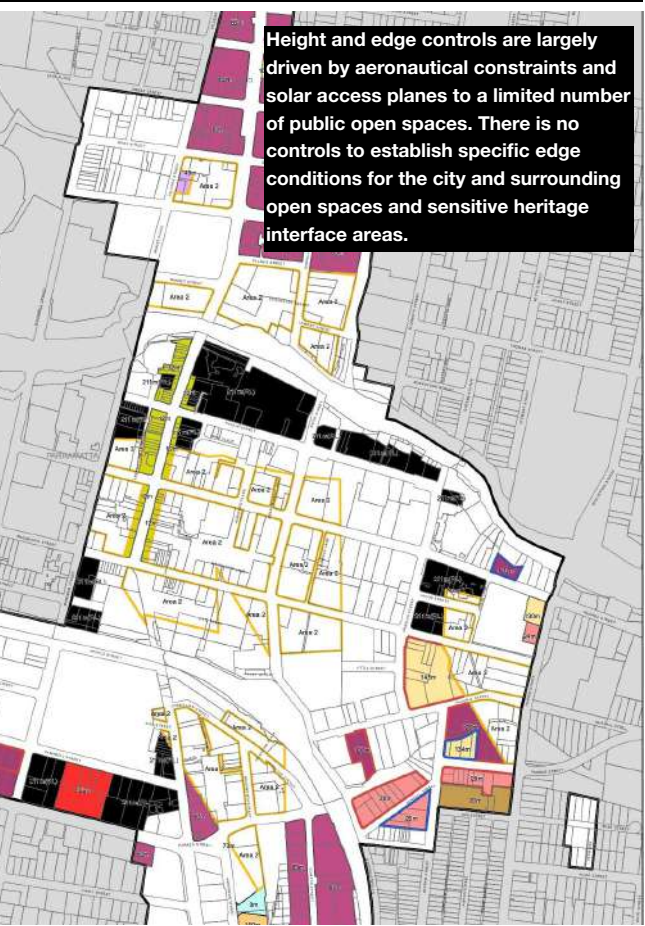
View looking East from Old Government House along George Street alignment



View looking East from Tudor Gatehouse along George Street



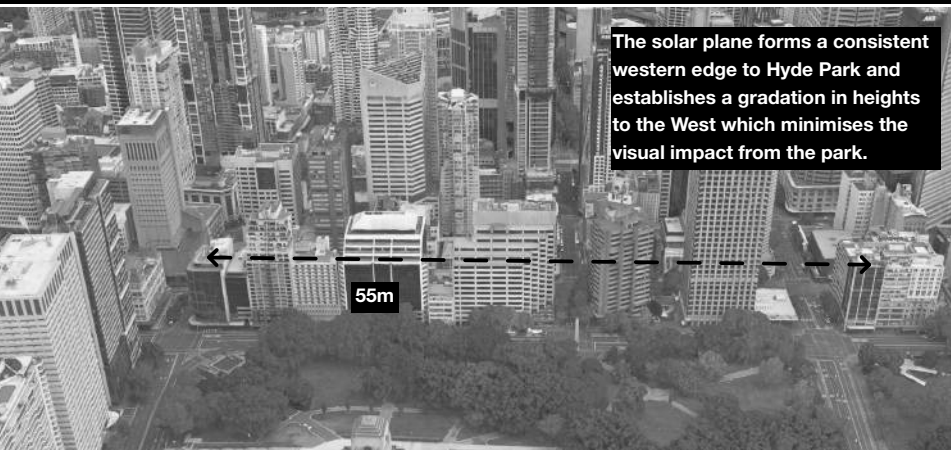
Proposed Parramatta LEP Height of Building



View looking towards Macquarie Street and Martin Place from the Domain



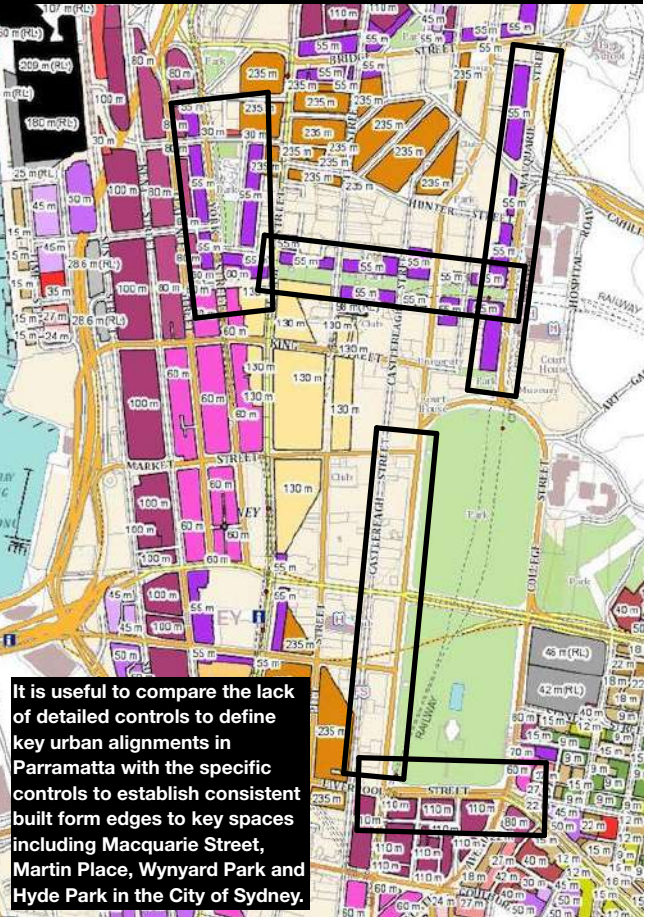
Aerial view of the western edge to Hyde Park



Aerial view looking across Hyde Park down Oxford Street

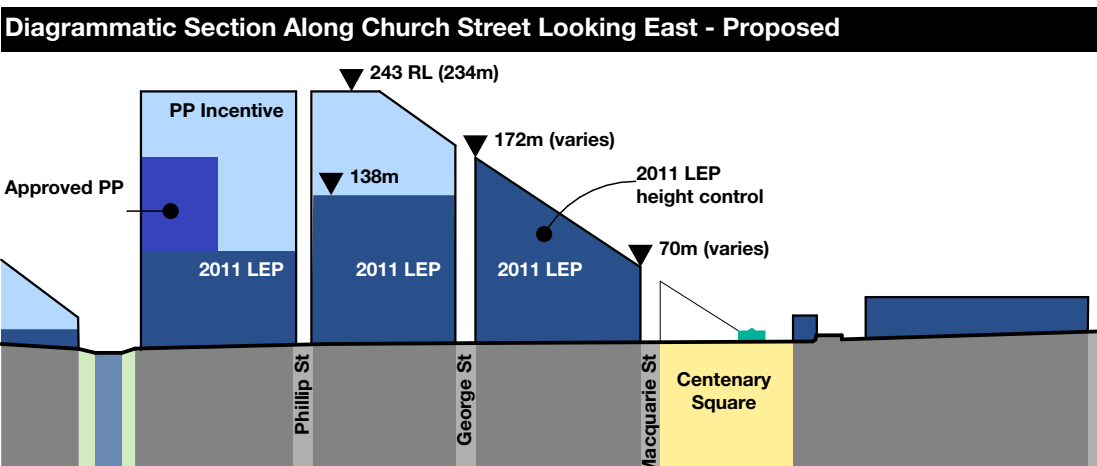
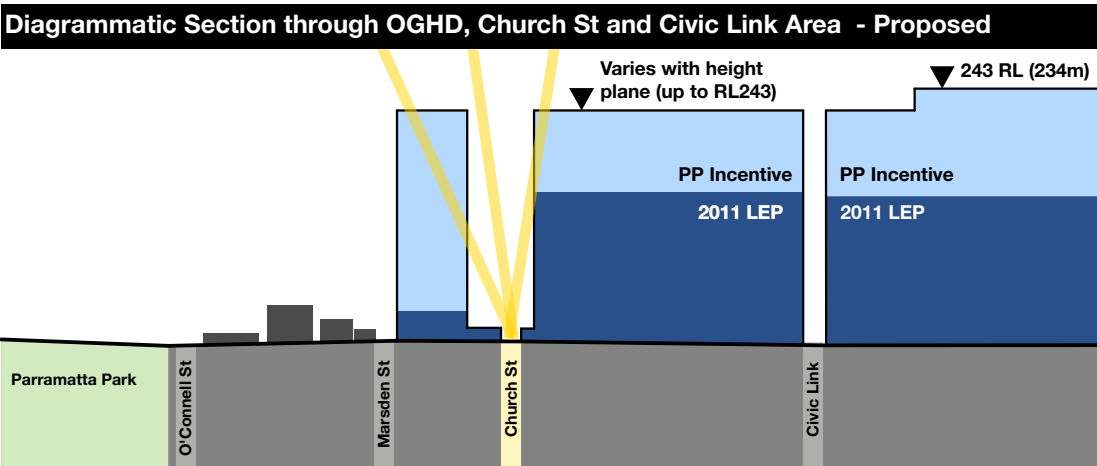


City of Sydney LEP Height of Building

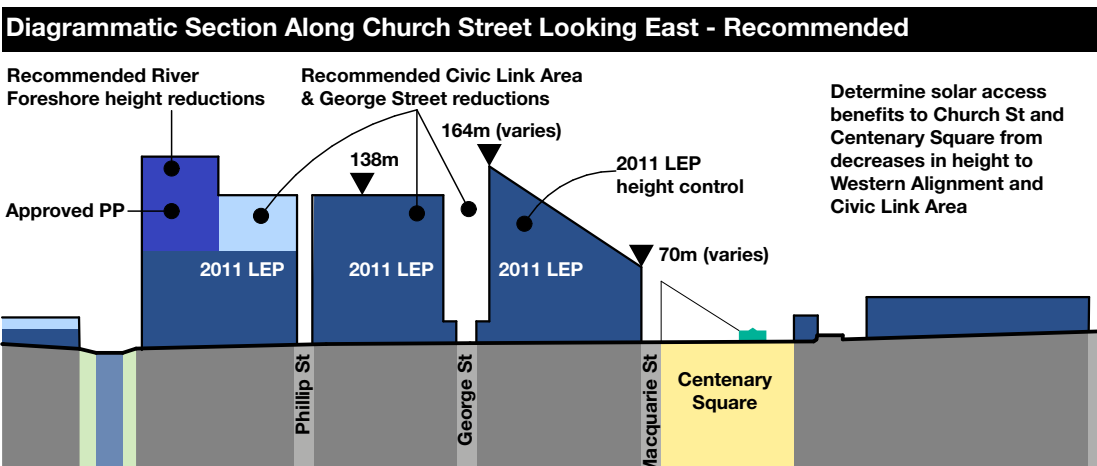
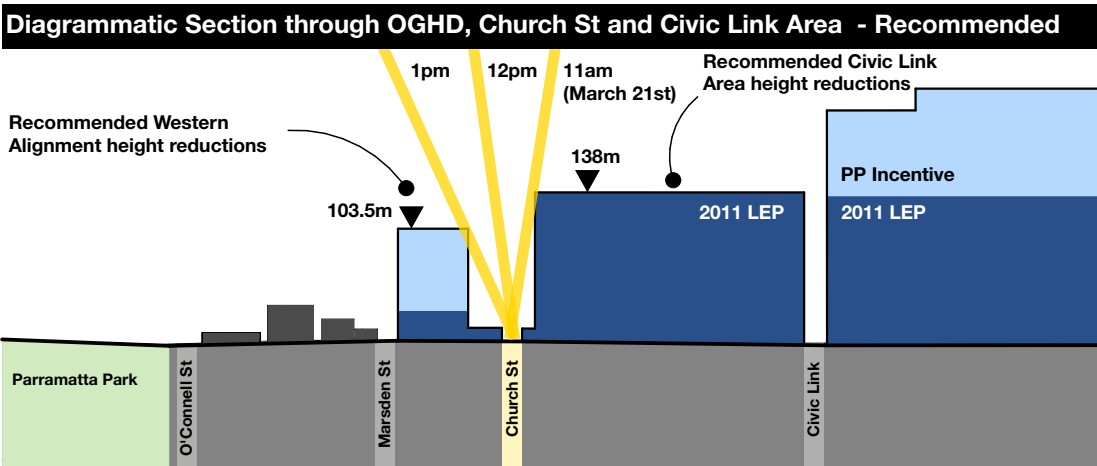
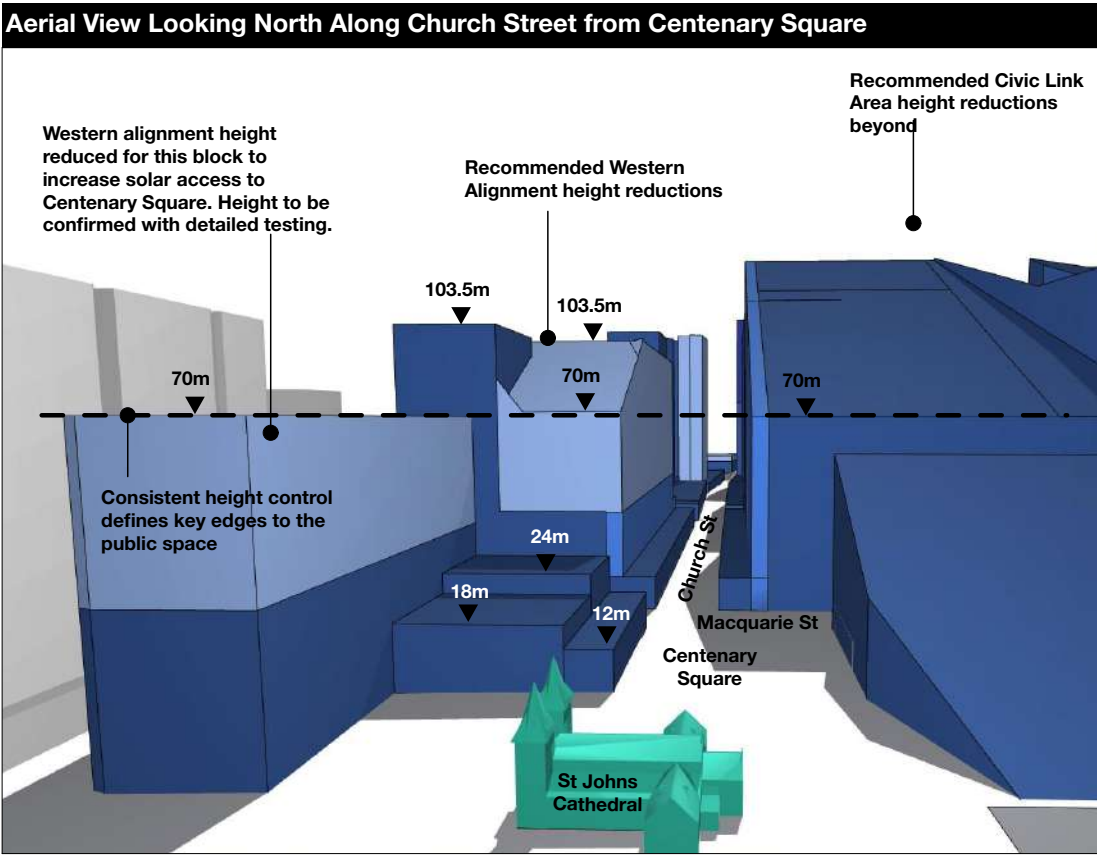


Church Street & Centenary Square

Planning Proposal Height Controls



Recommended Height Controls



Observations

Church Street forms the historic north-south spine of the city and compliments the east-west axis of George Street.

The street frames significant views St John's Cathedral which are protected by the Church Street View Corridor. This corridor increases in width south of Macquarie Street to align with the width of Centenary Square and the grounds to St John's Cathedral.

Centenary Square is one of the most significant civic spaces in the city centre and yet there are no solar controls to this public open space within the proposed LEP controls.

Church Street is one of Parramatta's most active and vibrant streets supporting a range of outdoor dining opportunities. While the LEP and DCP seeks to retain and reinforce its fine grain, scale and pedestrian character, earlier proposals for solar protection to this important public realm have not been adopted within this Planning Proposal.

The recommended decreases in height controls in this assessment to the western CBD alignment as well as the decreases in height controls to the Civic Link area provide an opportunity to establish solar controls to both Centenary Square and Church Street to preserve and protect the excellent amenity they currently enjoy.

Recommendations

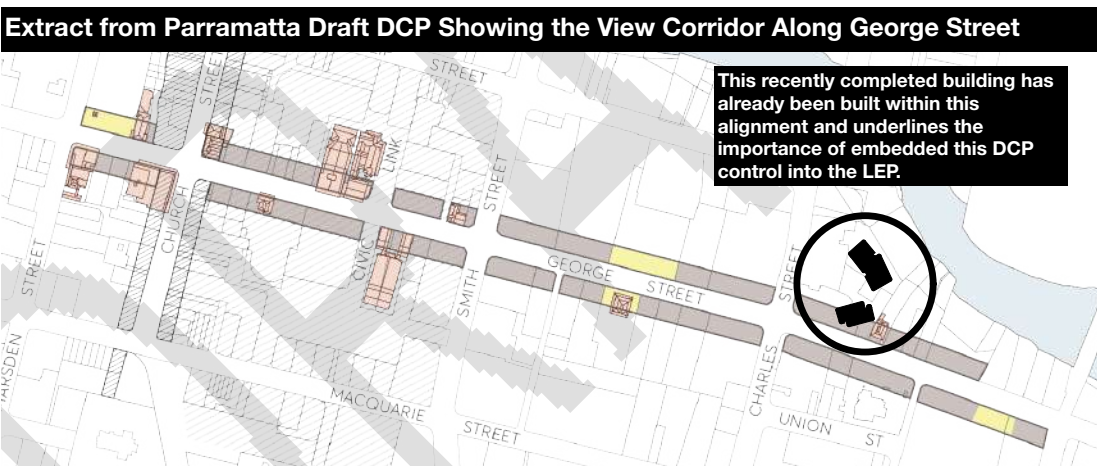
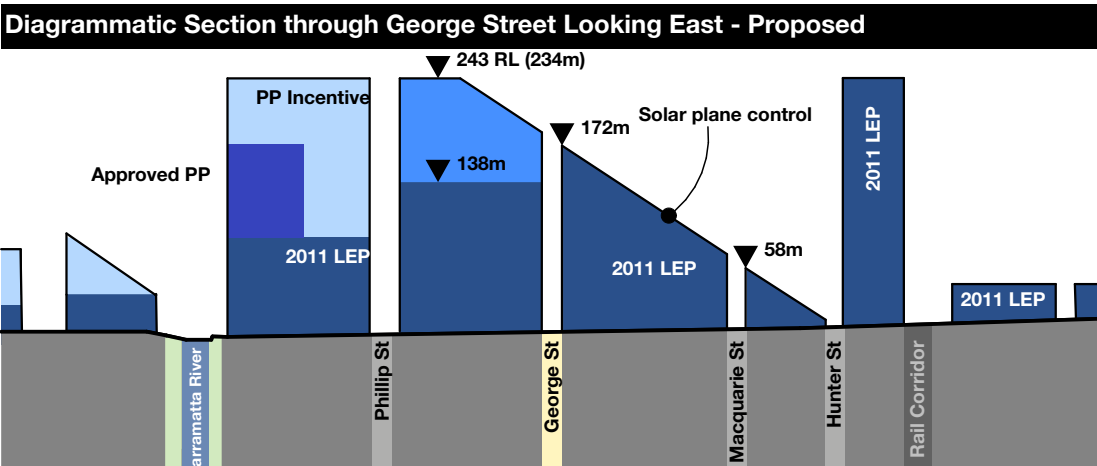
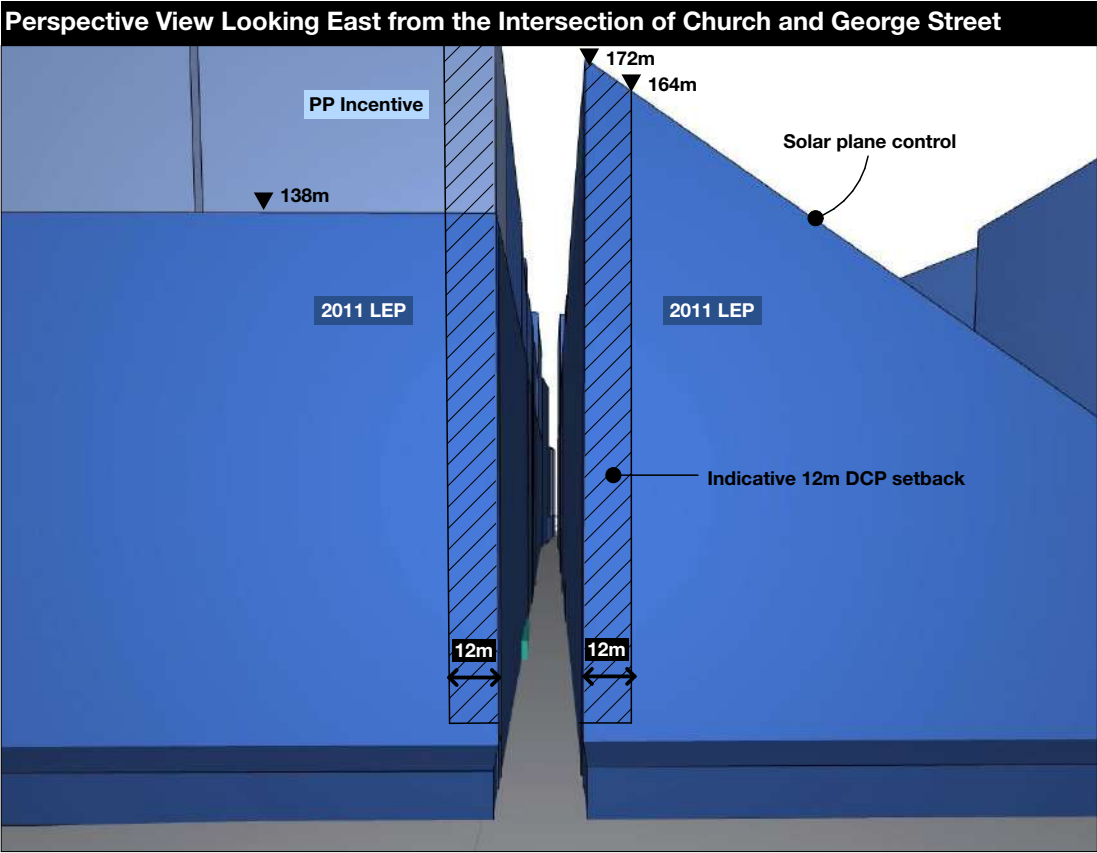
Test the increase in solar access and sky view for both Church Street and Centenary Square provided under the recommended reductions in height controls to the surrounding blocks.

Determine what solar access window is relevant for these public spaces to potentially increase the range of times when public spaces receive sunlight across the city centre to serve a wider range of users.

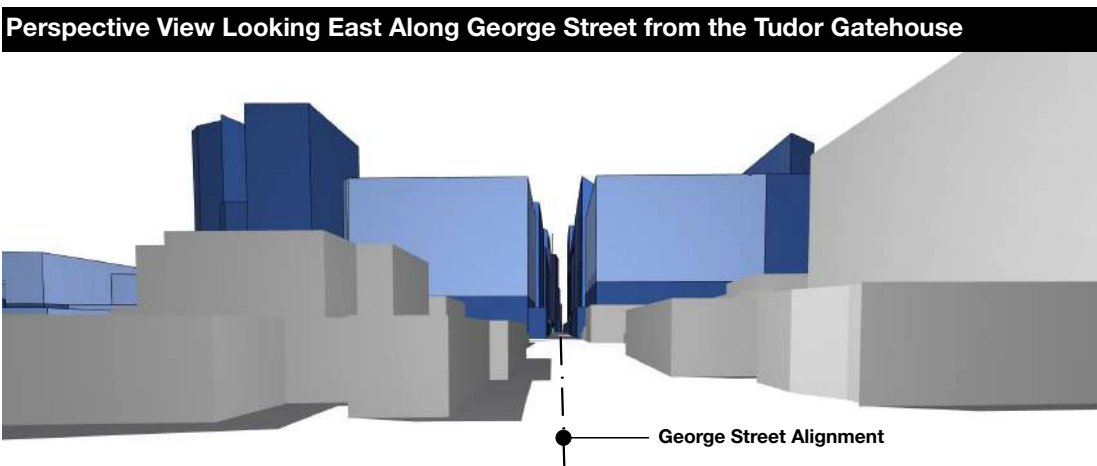
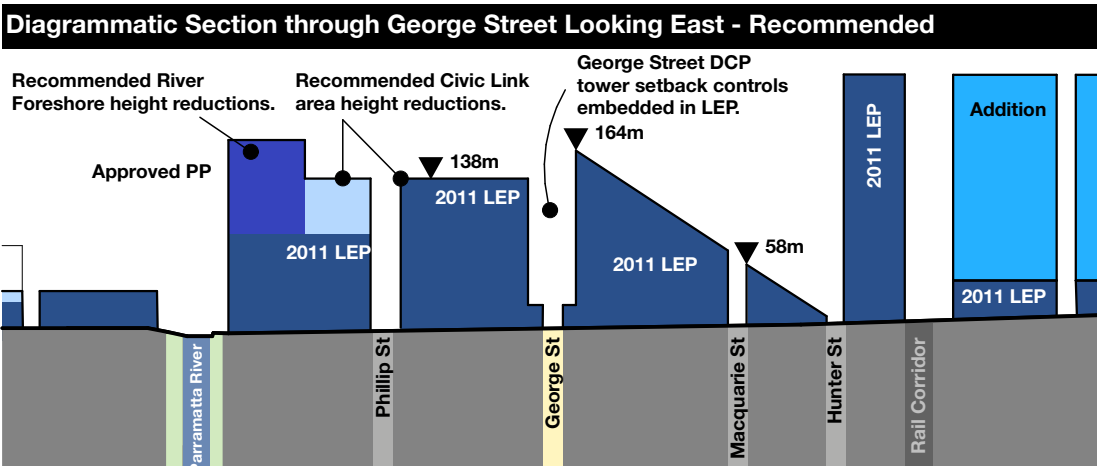
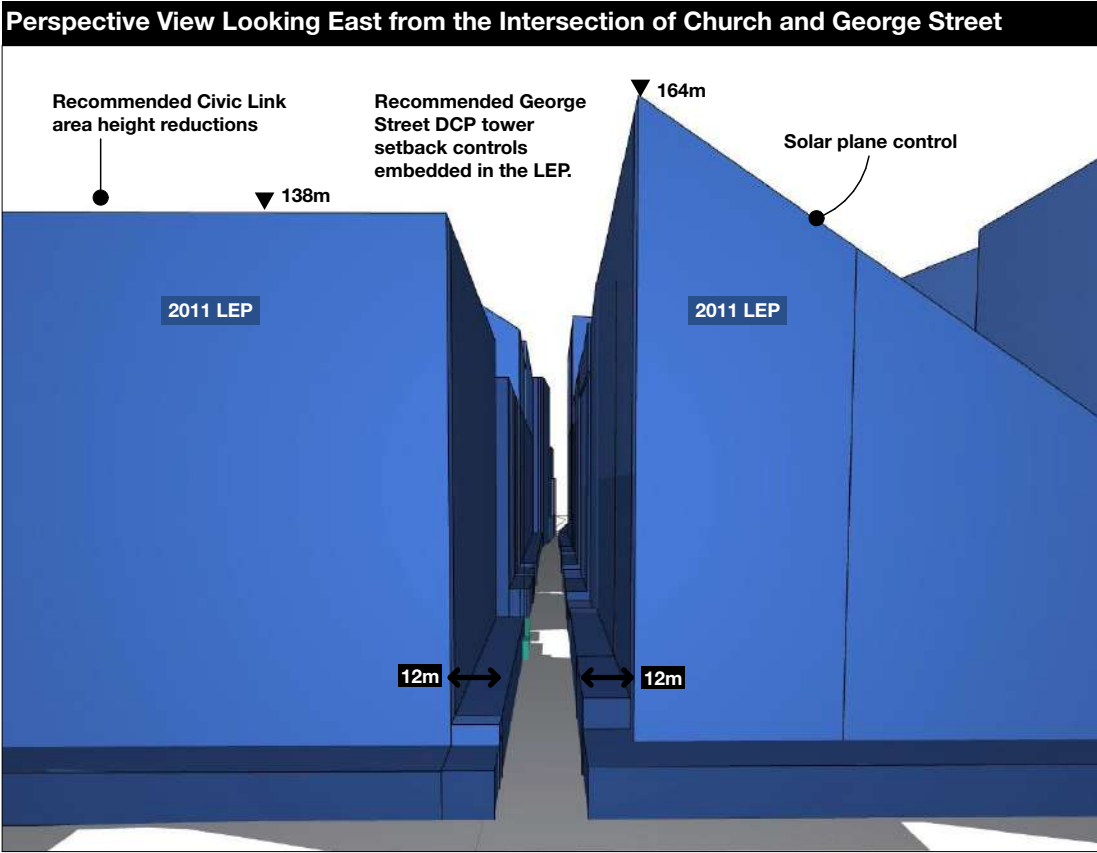
Carefully calibrate the recommended heights for the adjoining blocks to protect and maintain solar access to these significant civic spaces.

George Street Setback Alignment

Planning Proposal Height Controls



Recommended Height Controls



Observations

George Street was originally planned as 200 ft (60.96m) wide and was one of the primary axes in Parramatta's original town plan spanning between Government House and Queen's Wharf. The width of the street was reduced to its present 20m width in 1811 to accommodate an expanding population.

George Street has significant historic, cultural and urban value. Remnant heritage items are interspersed with contemporary commercial development and the street terminates with significant parklands at either end.

The proposed DCP includes controls for street wall boundary buildings with a minimum of 14m and a maximum of 21m to reinforce the current 20m street alignment. To acknowledge the original 200 feet width, towers should be set back at least 12m from the boundary.

These controls acknowledge the significant views and vistas along George Street to and from the Tudor Gates and ensure protection and interpretation of the original axis connecting Government House and Queens Wharf as a nationally significant cultural landscape.

Recommendations

Embed the proposed DCP tower setback controls for George Street within the LEP to provide additional certainty in urban and built form outcomes and to ensure ongoing protection of this axis and view line.

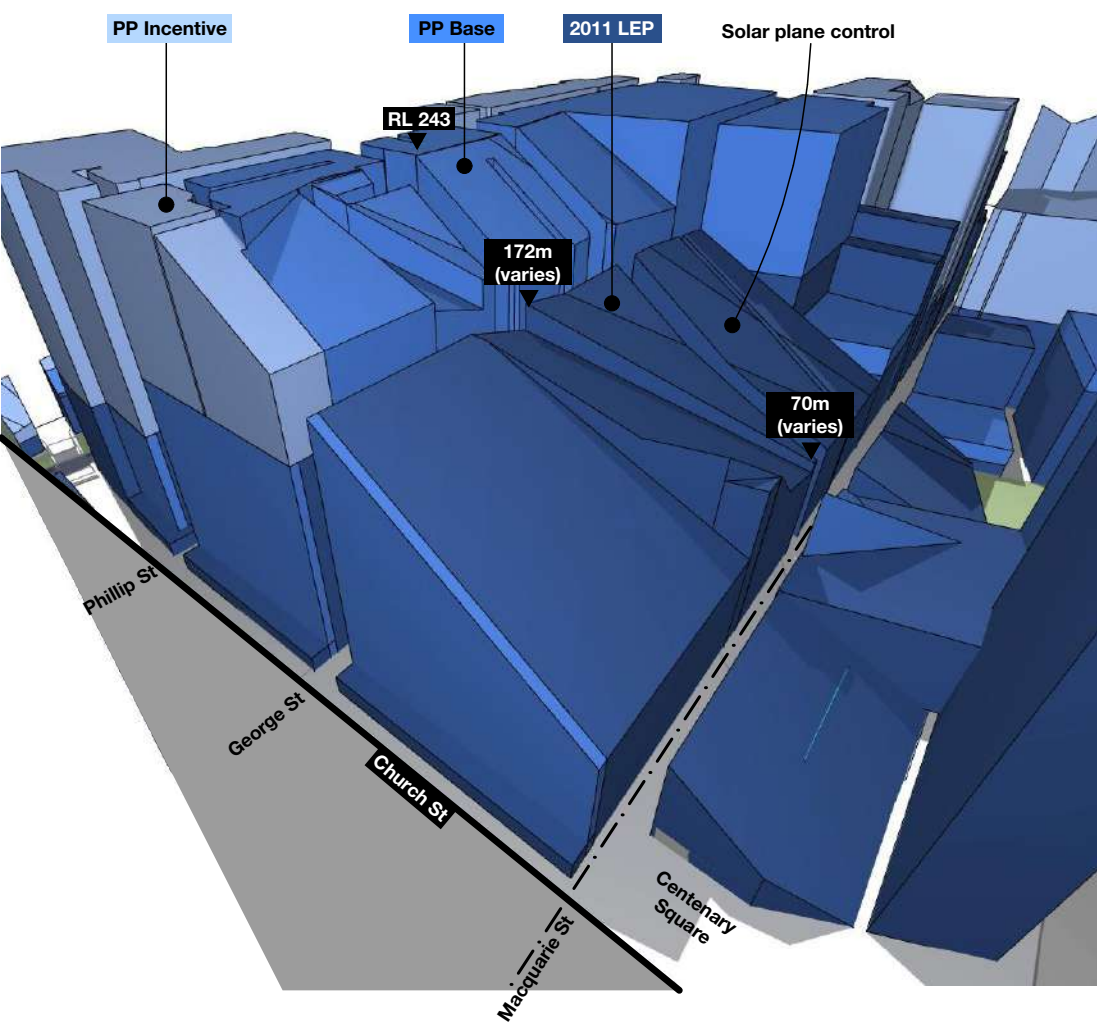
The recommendation to include detailed LEP controls for George Street corresponds with the level of LEP controls that are proposed for Church Street and recognises the dual importance of these two historically significant axes.

Greater weight should be given to the unique heritage and spatial character of George Street including the many heritage elements including exemplary Modern-era buildings. Detailed heritage and urban advice should be obtained as part of future studies.

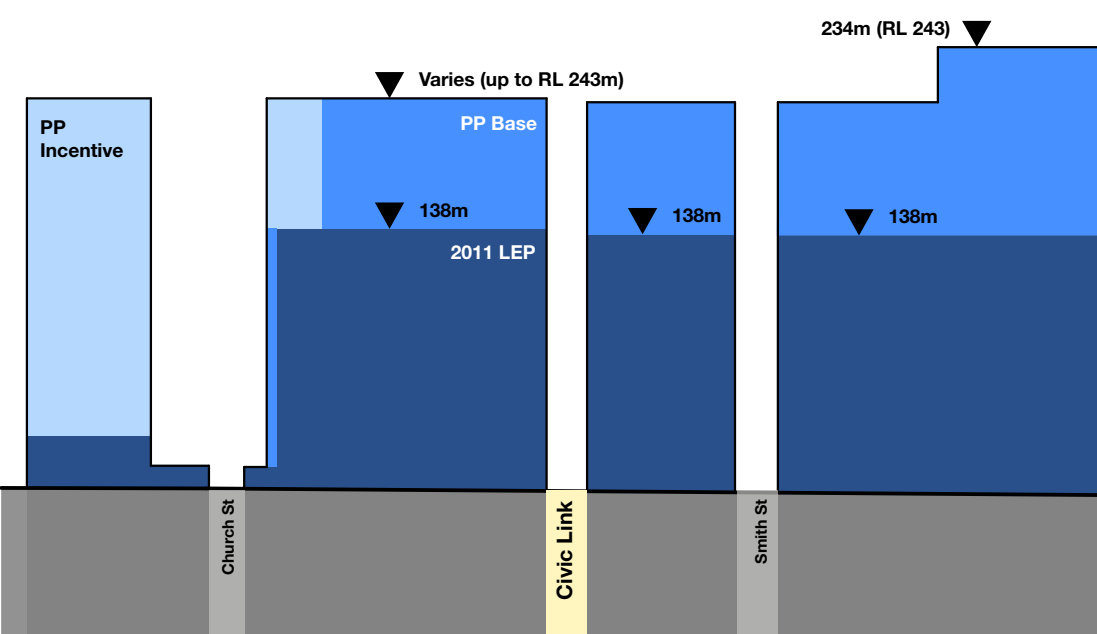
Civic Link Area - Summary

Planning Proposal Height Controls

Axonometric Looking North-East from Church Street Across the Civic Link Area

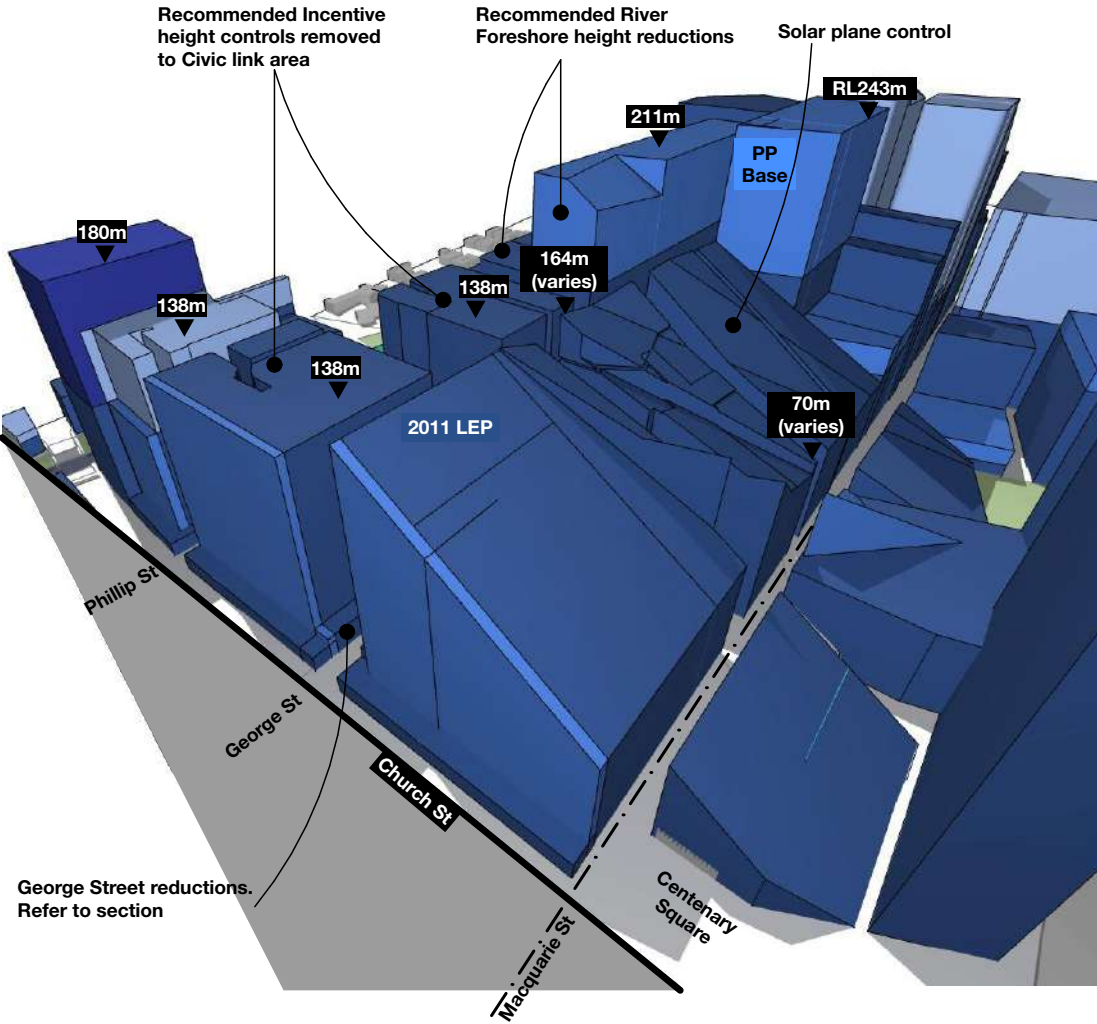


Diagrammatic Section through the Civic Link Area Looking North - Proposed

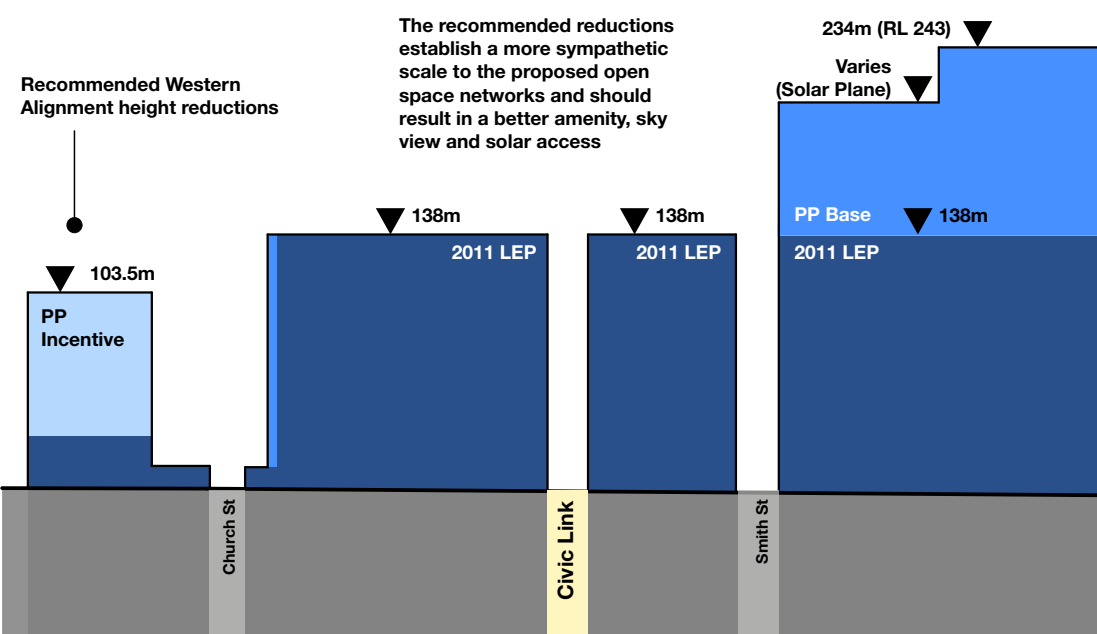


Recommended Height Controls

Axonometric Looking North-East from Church Street Across the Civic Link Area



Diagrammatic Section through the Civic Link Area Looking North - Recommended



Observations

The Civic Link Special Area is located in the centre of city and consists of 4 city blocks that span between Church and Smith Streets. Civic Link will form an important pedestrianised public space that extends northward from Parramatta Square through these blocks to the proposed Powerhouse Museum and River Square.

The siting of the new Metro West station within the blocks bounded by Macquarie and George Streets has provided an important opportunity for substantial urban renewal including the delivery of a portion of Civic Link, a series of fine grain laneway connections, and the potential for a substantial new public plaza. These public domain initiatives will be transformative for Parramatta and provide a good example of the importance in balancing transport investment, development opportunities, and the establishment of new public domain to deliver an integrated and holistic urban outcome.

The proposed height of building controls to the north of George St risk overwhelming the sale and character of Civic Link and severely impacting the amenity of the public domain.

There is currently no provision within the LEP to provide solar access protection to Civic Link and associated public spaces which seems short sighted given the important role this space will in the city centre. The DCP includes some requirements for solar access but it is doubtful what protection these controls given the heights proposed and the wording of the control:

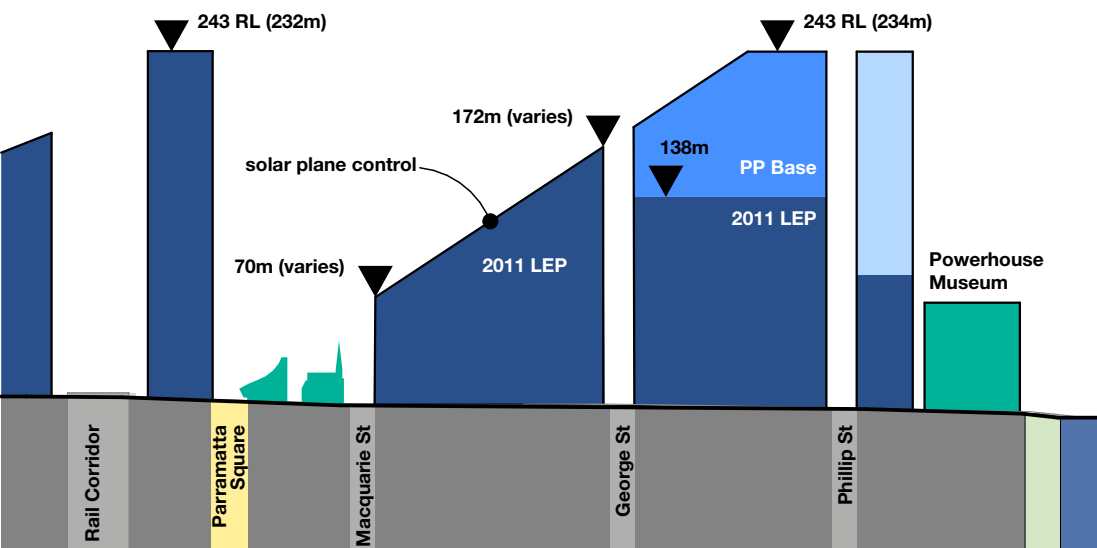
C.04 New development and additions or alterations must not cause overshadowing of the pedestrian areas (Civic Link and squares and lanes) beyond the allowable building envelopes defined by the permissible FSR and building height in the LEP and the setbacks in this DCP)

This is a rare opportunity to establish Parramatta as a CBD with the civic character and open space amenity equivalent to the Sydney CBD that can attract the high quality commercial growth, jobs and investment that have been identified as an objective of this Planning Proposal.

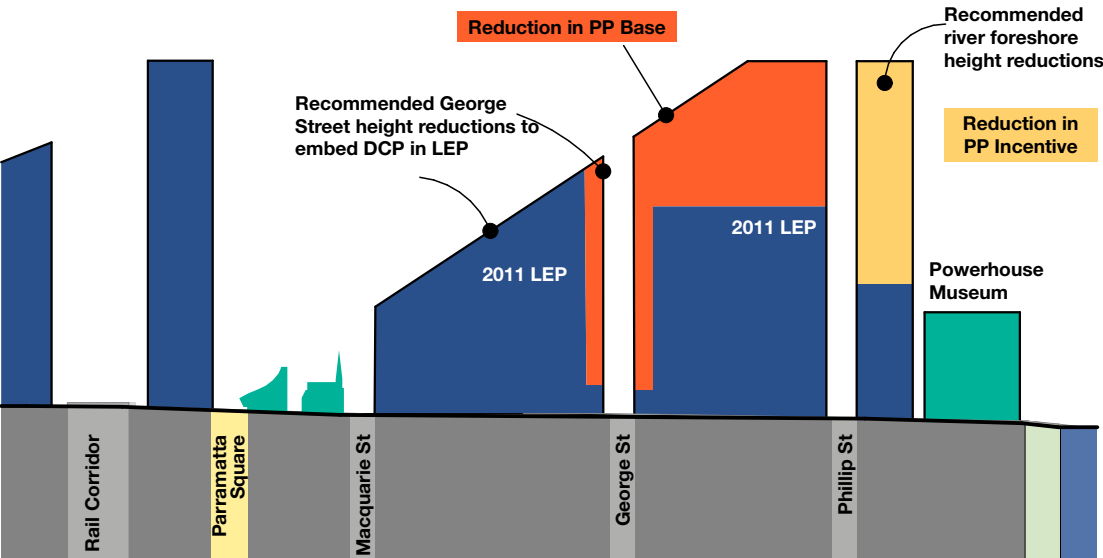
Civic Link Area - Sectional Analysis

Section Along Civic Link Looking West Towards Church Street

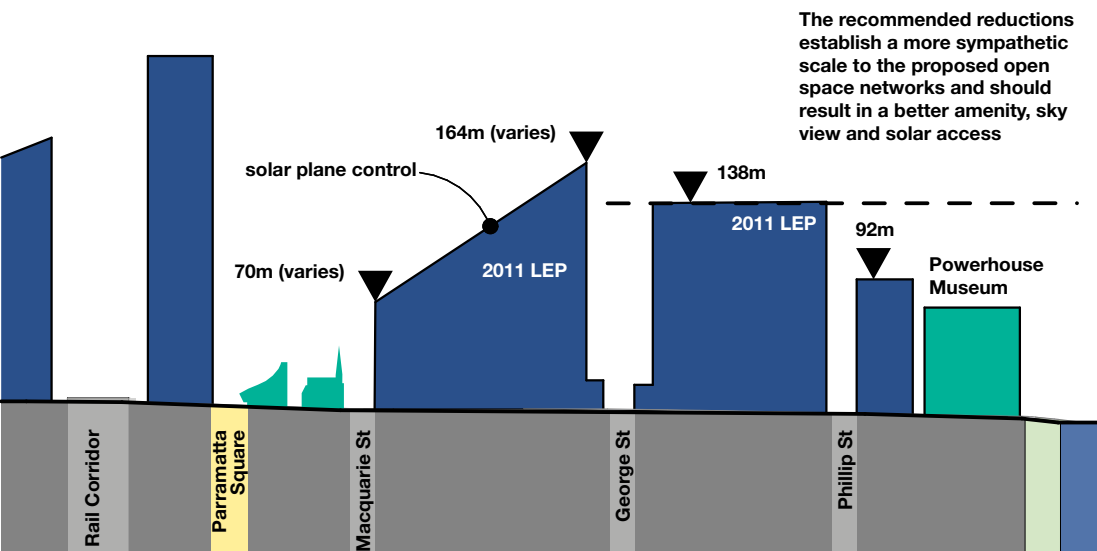
1. Planning Proposal Height Controls



2. Proposed Reductions in Height Controls

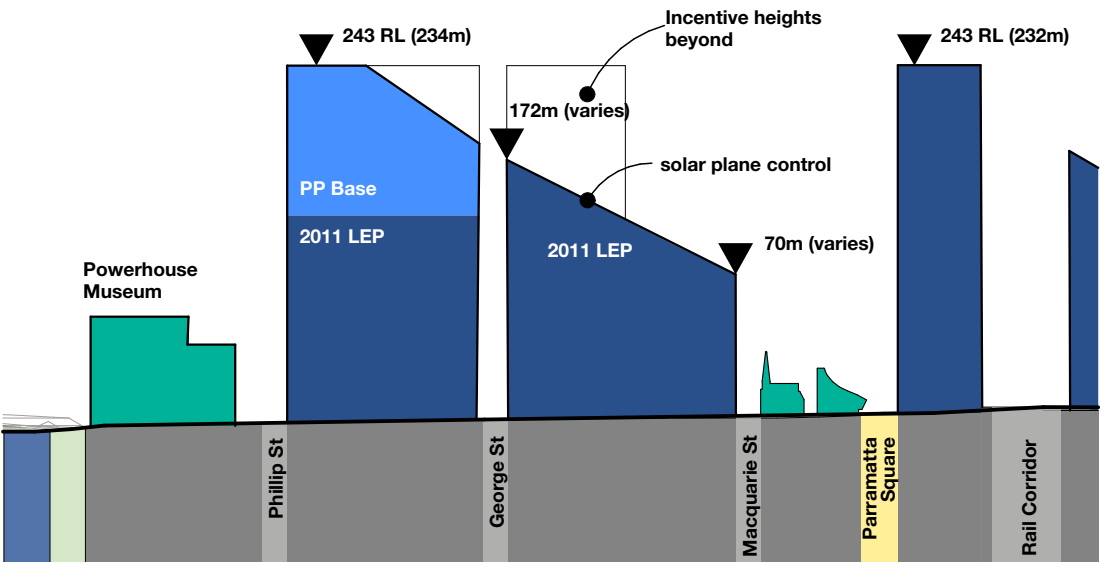


3. Recommended Height Controls

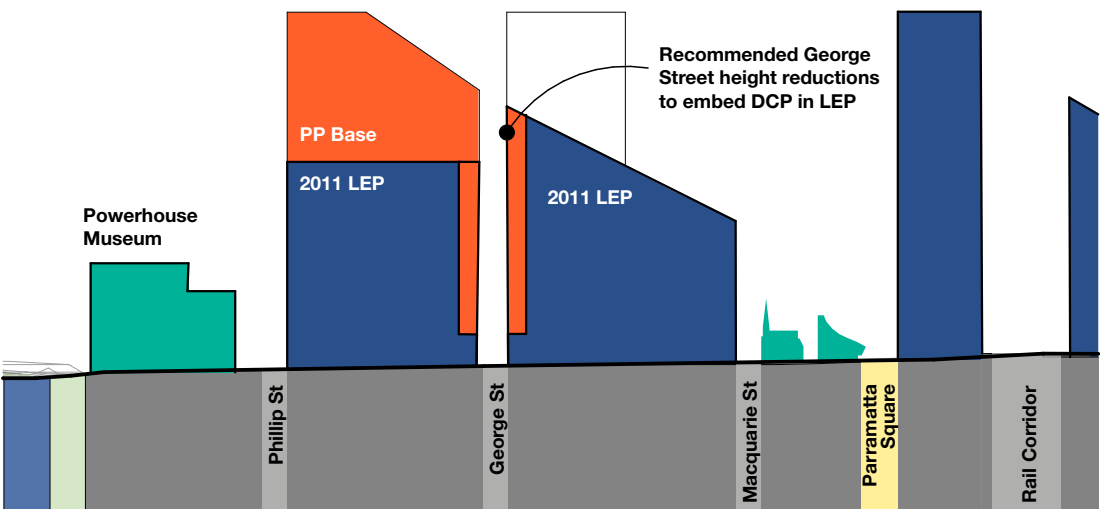


Section Along Civic Link Looking East Towards Smith Street

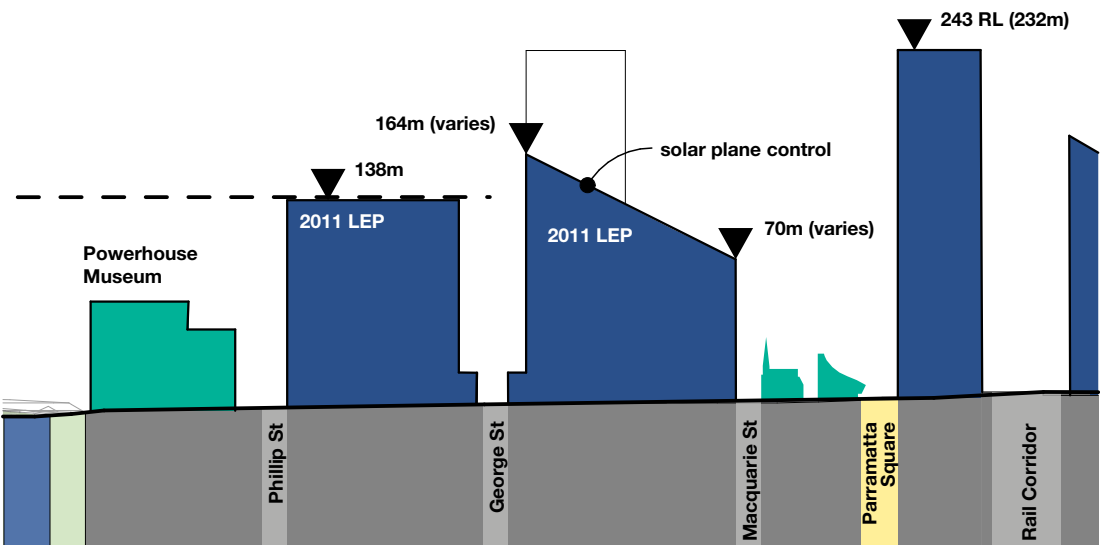
1. Planning Proposal Height Controls



2. Proposed Reductions in Height Controls



3. Recommended Height Controls



Recommendations

Define LEP building height controls that:

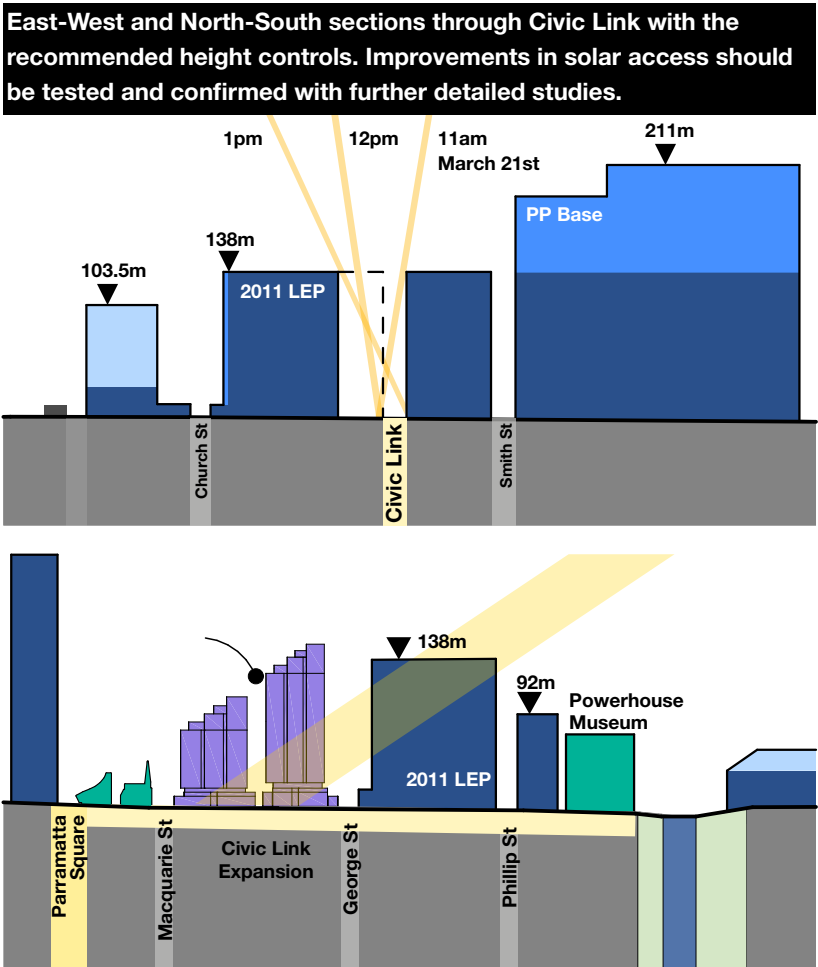
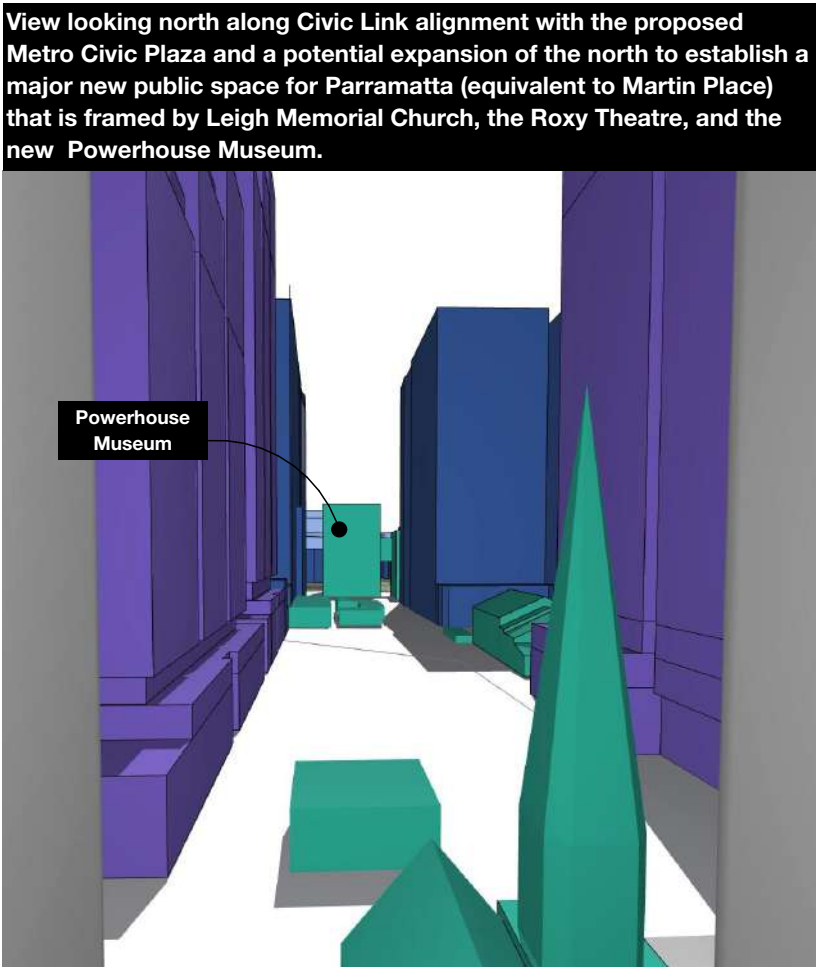
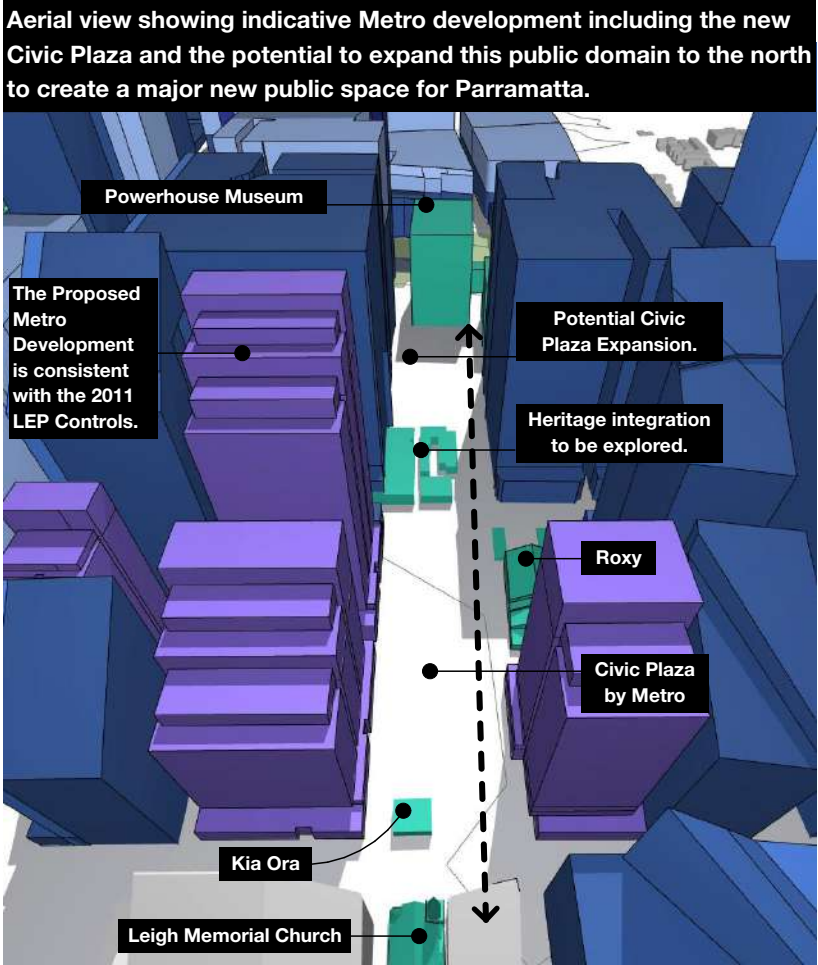
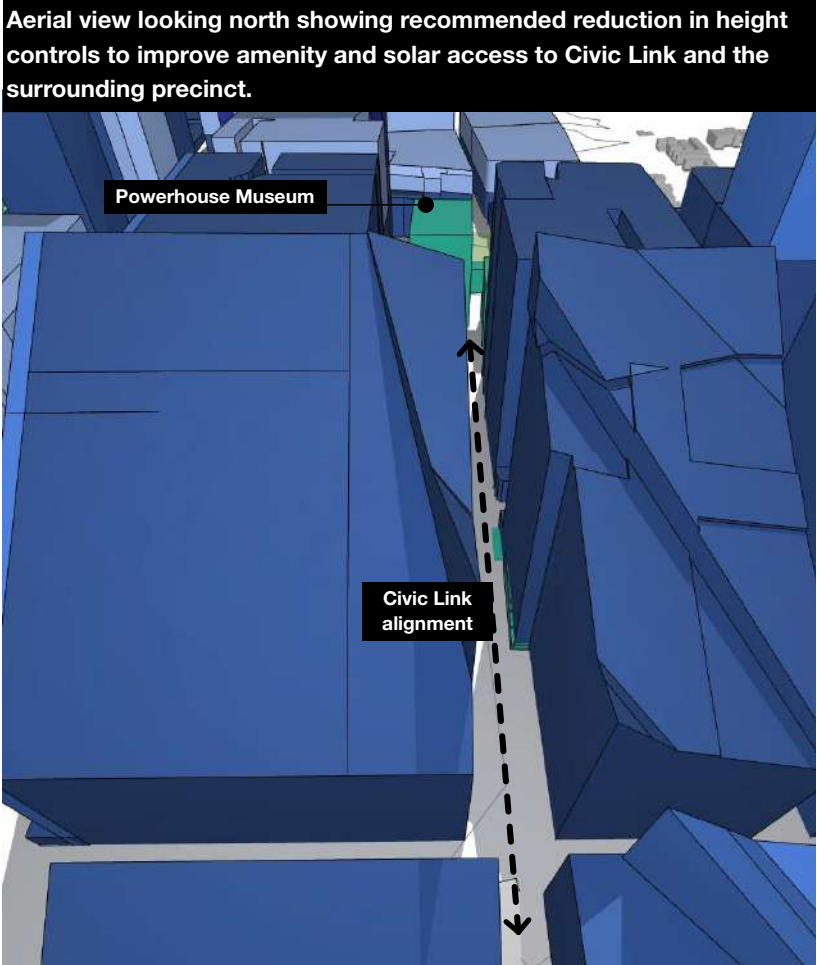
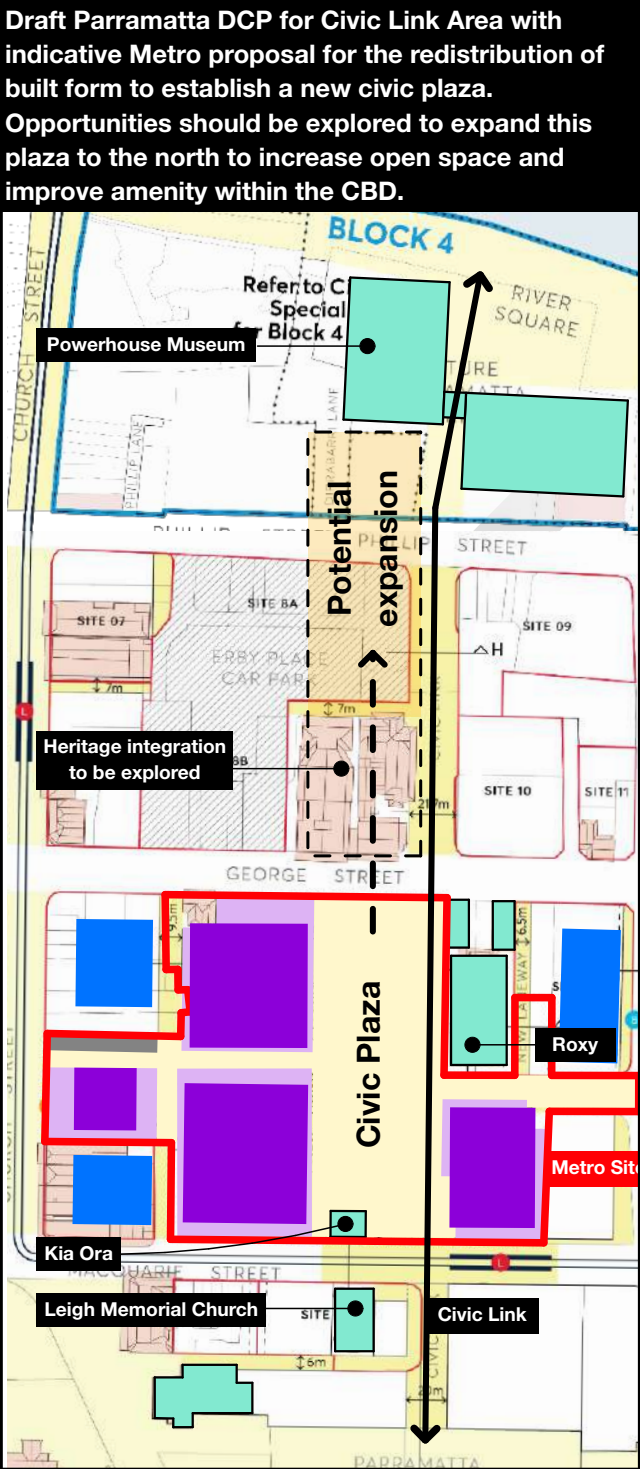
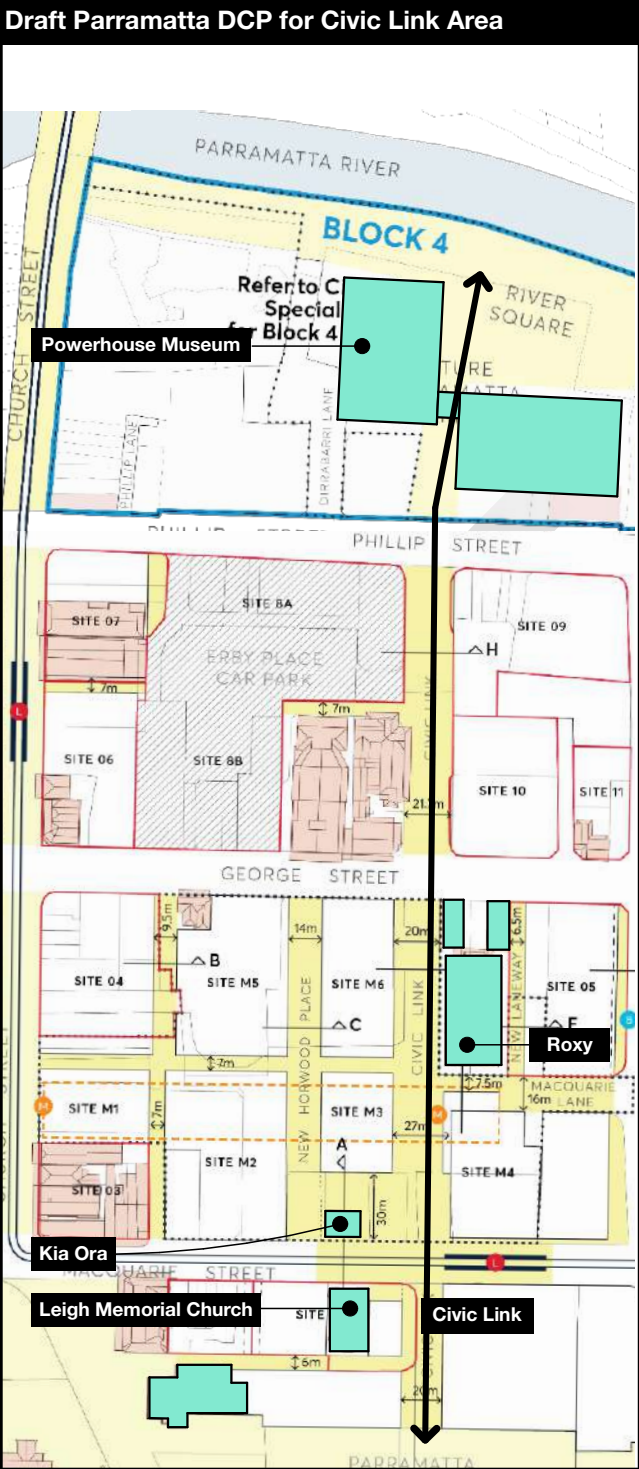
- 1) Establish and support a civic character and proportion with buildings that do not overwhelm the scale of the proposed public domain, and
- 2) Provide adequate solar access to Civic Link and other important open spaces within this precinct to ensure adequate provision of sunlight, sky views and amenity for the public domain.

The proposed increase in base and incentive height controls north of George Street between Church and Smith Street should be removed, and the existing height controls retained.

Undertake detailed solar analysis to determine the most appropriate range of solar controls (e.g. 12-2pm Equinox) that can be achieved for Civic Link without further impacting commercial development opportunities.

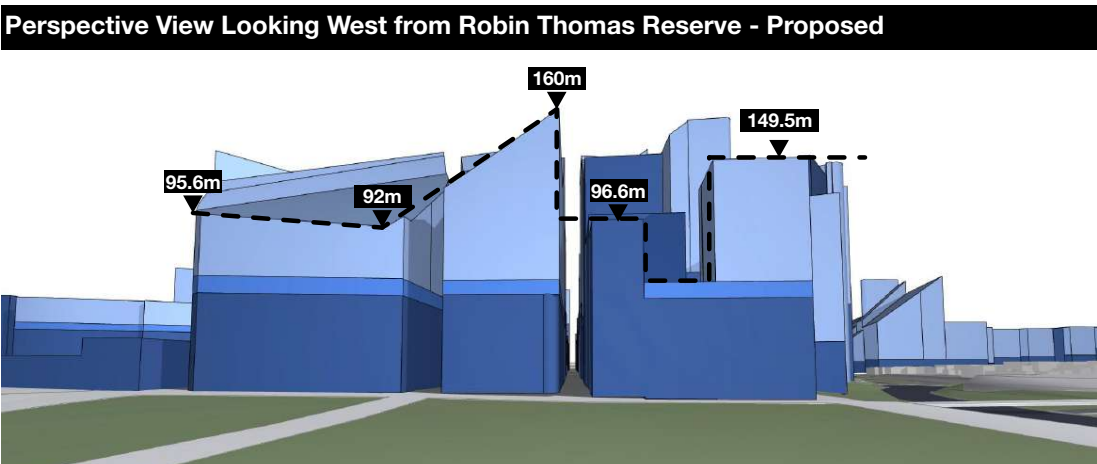
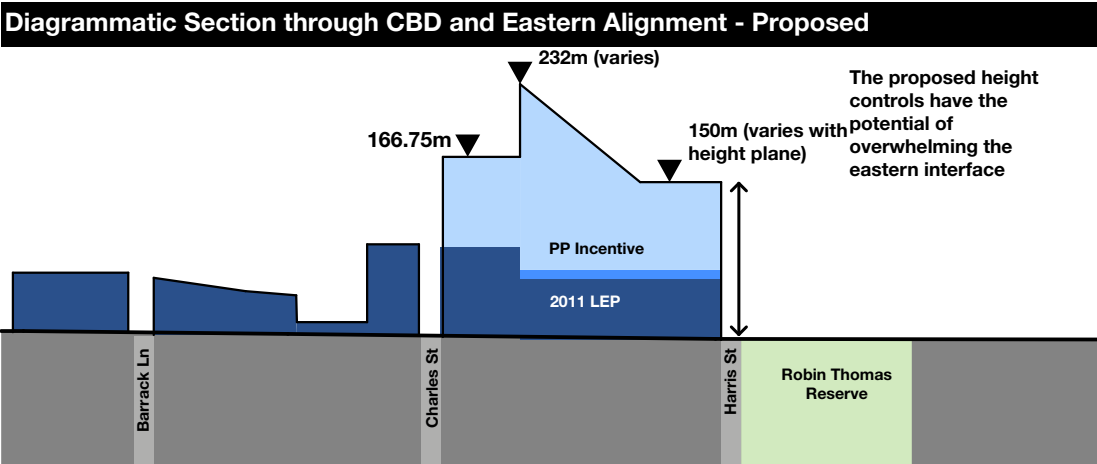
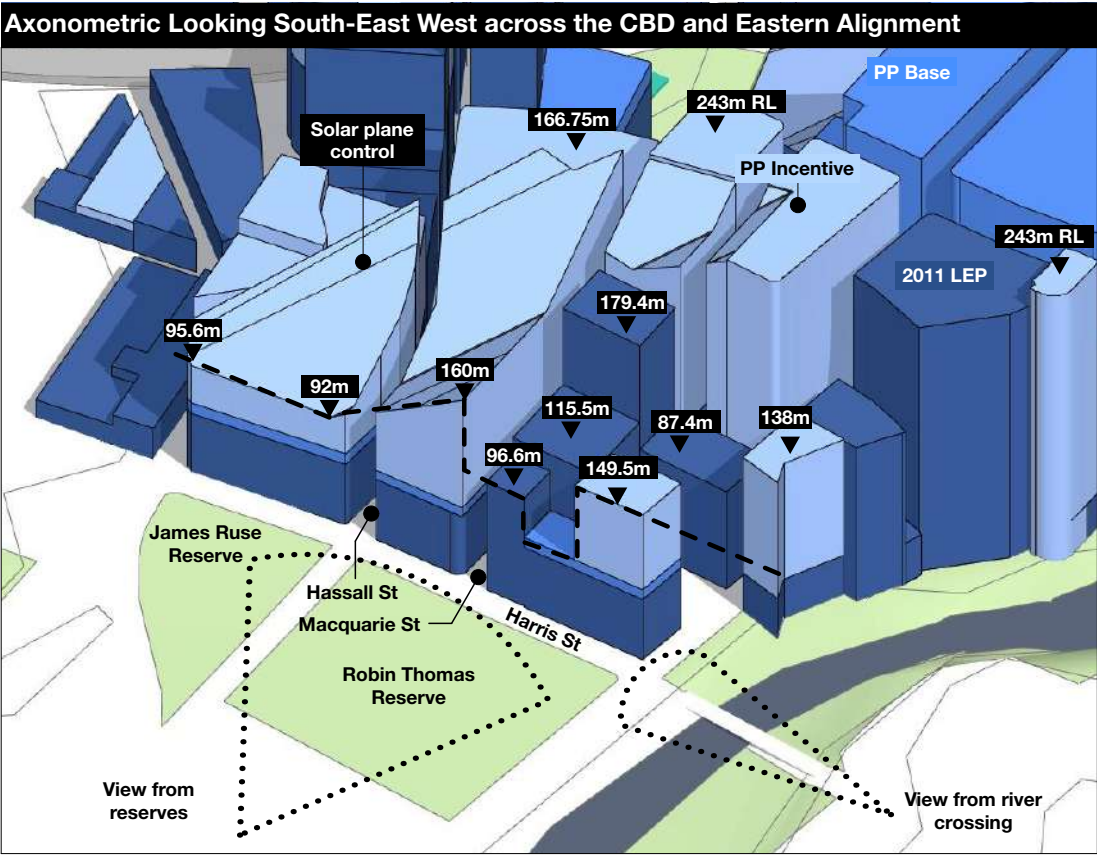
Any opportunities to increase view lines to the Powerhouse Museum from Civic Link and the proposed public spaces should be explored to anchor this important cultural institution within the city centre.

Civic Link Area - Open Space Opportunities

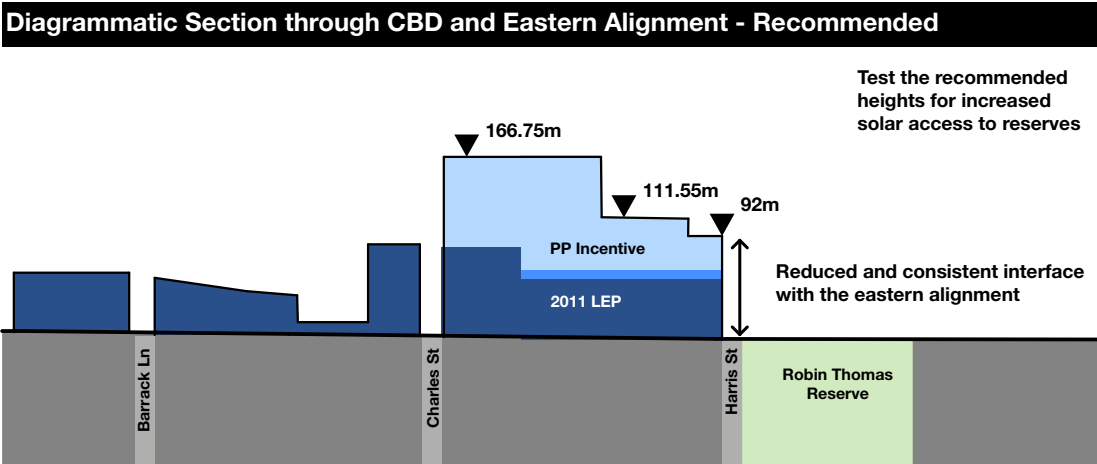
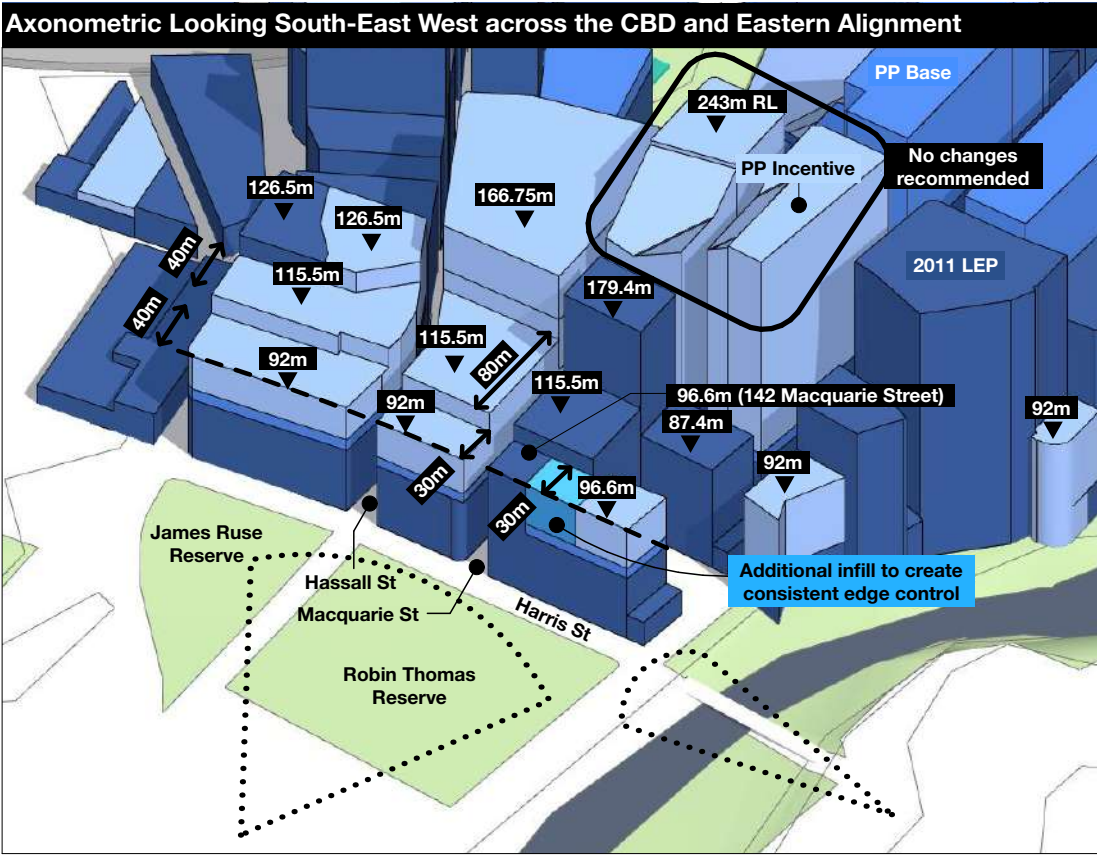


Eastern Alignment

Planning Proposal Height Controls



Recommended Height Controls



Observations

The blocks between George, Harris and Parkes Street form an important address from the eastern approach along the Parramatta River and define the eastern built edge between the CBD and the series of parks, reserves and significant heritage items to the east including Robin Thomas, James Ruse and Hambledon Cottage Reserves, Experiment Farm, Elizabeth Farm and Queens Wharf Reserve.

The proposed planning controls are the result of a number of intersecting solar planes and approved planning proposal envelopes. The resulting control envelopes and potential urban form is overly complex and does not acknowledge the significance of this alignment and the potential to establish a consistent and well considered edge between the city and the open spaces to the east.

The relationship between the Domain and the consistent heights along the western edge of Macquarie St in the Sydney CBD provides a good example of the clear civic definition that could be achieved by reviewing these controls.

Recommendations

Detailed controls should be developed for this alignment to establish a consistent height control along Harris Street between George and Harris Streets to define an eastern urban edge for the Parramatta CBD and to create a transition in height between the tower clusters to the west and the adjacent parklands.

The proposed height north of Macquarie Street should align with the approved planning proposal at 142 Macquarie Street which establishes a datum of 96.6m (inclusive of Design Excellence). This height is broadly consistent with the proposed heights for the Parramatta River foreshore and results in further consistency when viewed from the eastern approach along the Parramatta River. The height of Macquarie Street is set at 92m and is defined by the lowest point on the solar access plane.

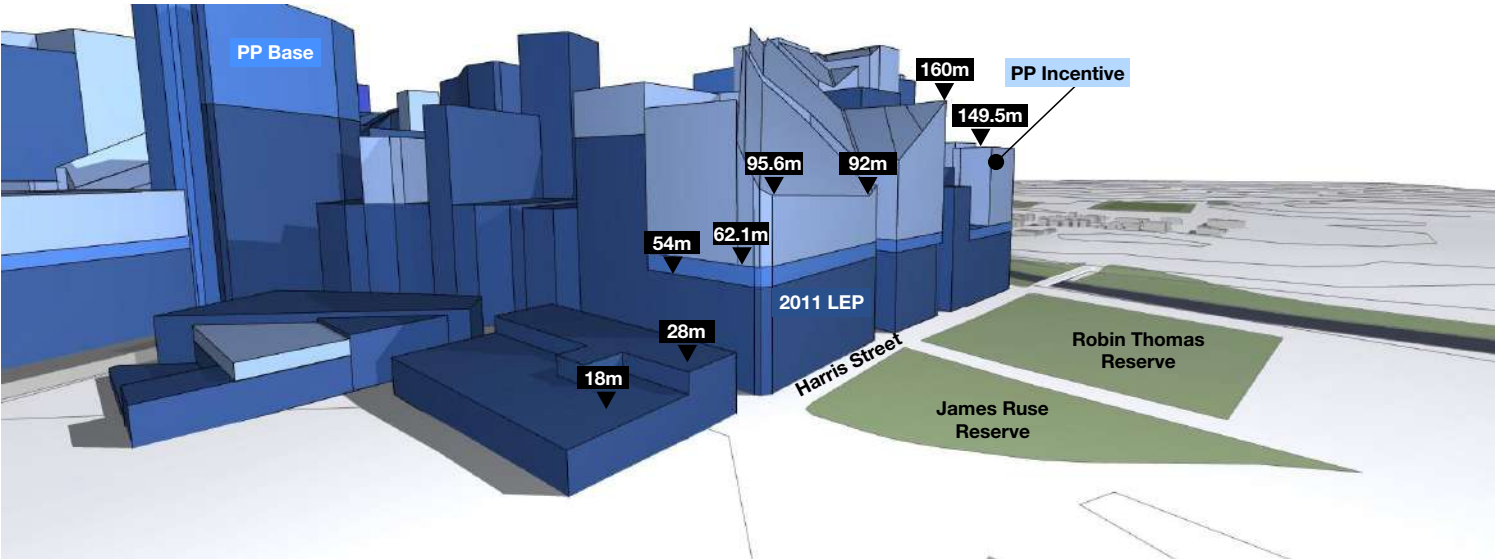
Further consolidation and simplification is proposed for the height controls to encourage a rational series of stepped buildings as the blocks extend to the west rather than the overly complex geometries (established by the series of solar control planes) that would be permissible under the proposed controls.

Consider undertaking detailed studies for the Eastern Alignment to determine whether it can be included in the area recommended for approval. This would include overshadowing, FSR and heritage analysis, and the preparation of a height control plan.

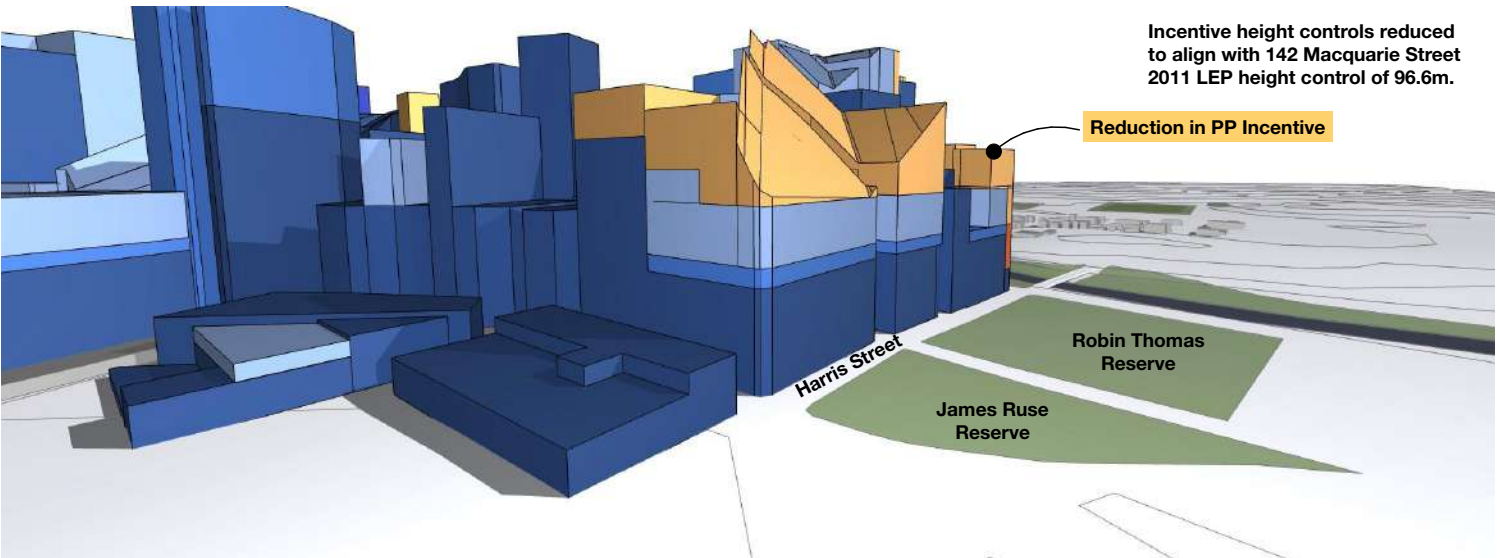
Eastern Alignment View Analysis

Aerial View Looking North-West Across James Ruse Reserve

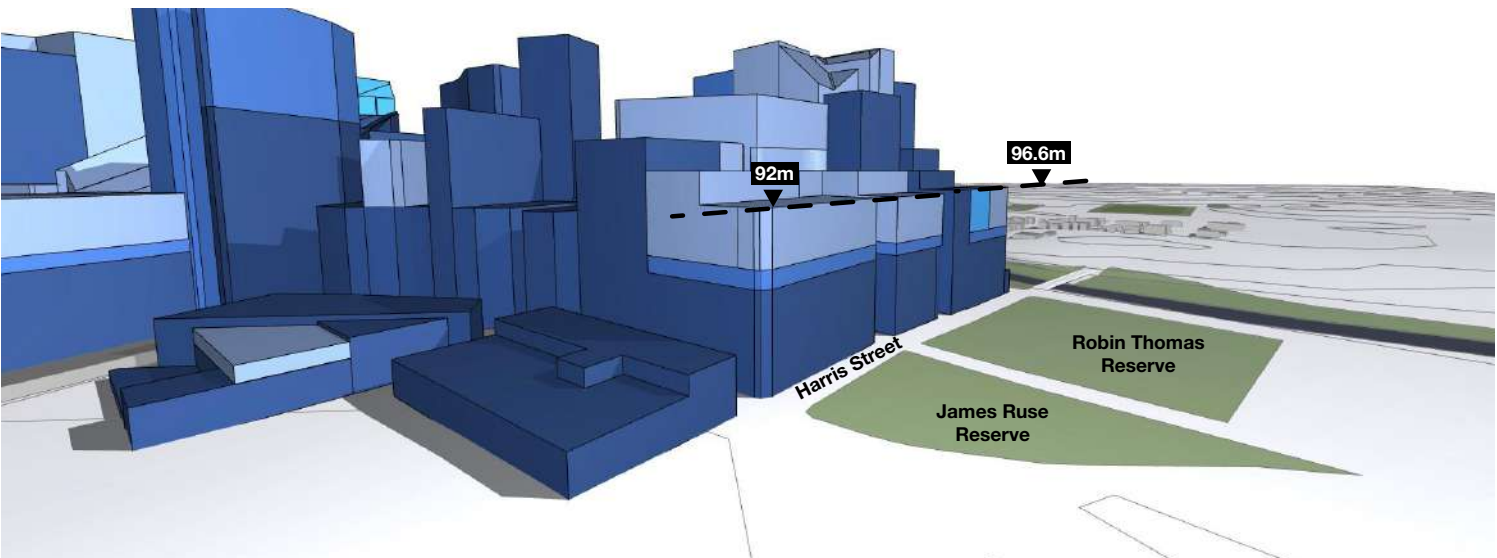
1. Planning Proposal Height Controls



2. Proposed Reductions in Height Controls

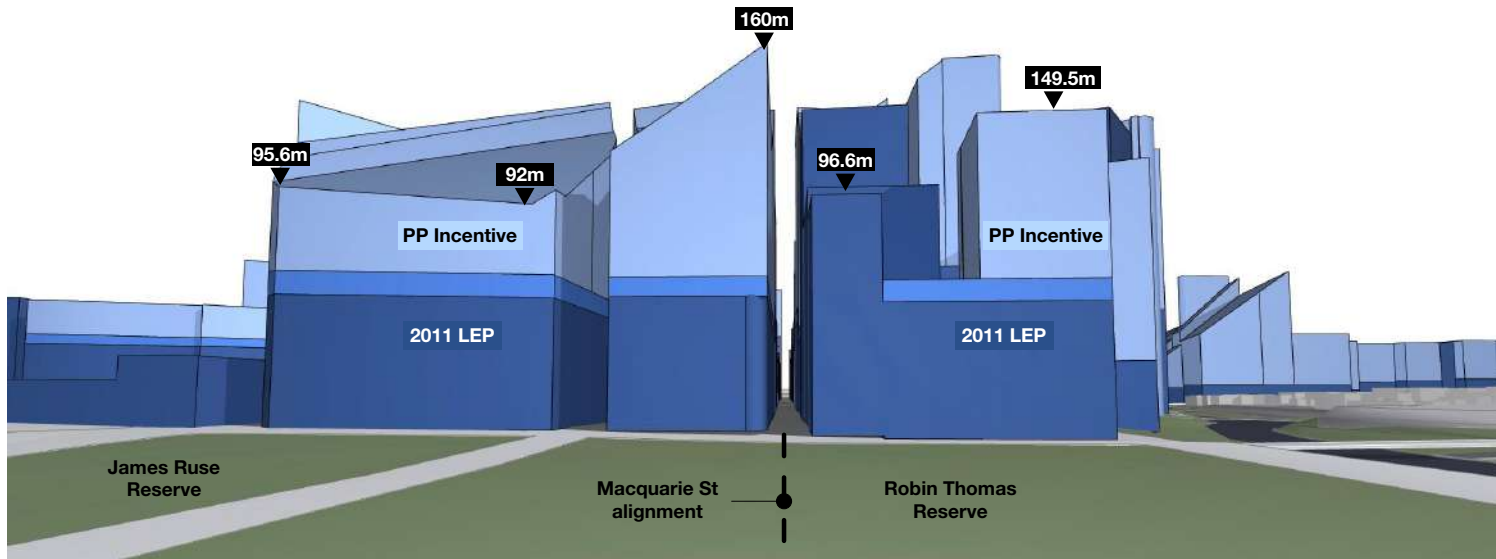


3. Recommended Height Controls



Perspective View Looking West from Robin Thomas Reserve

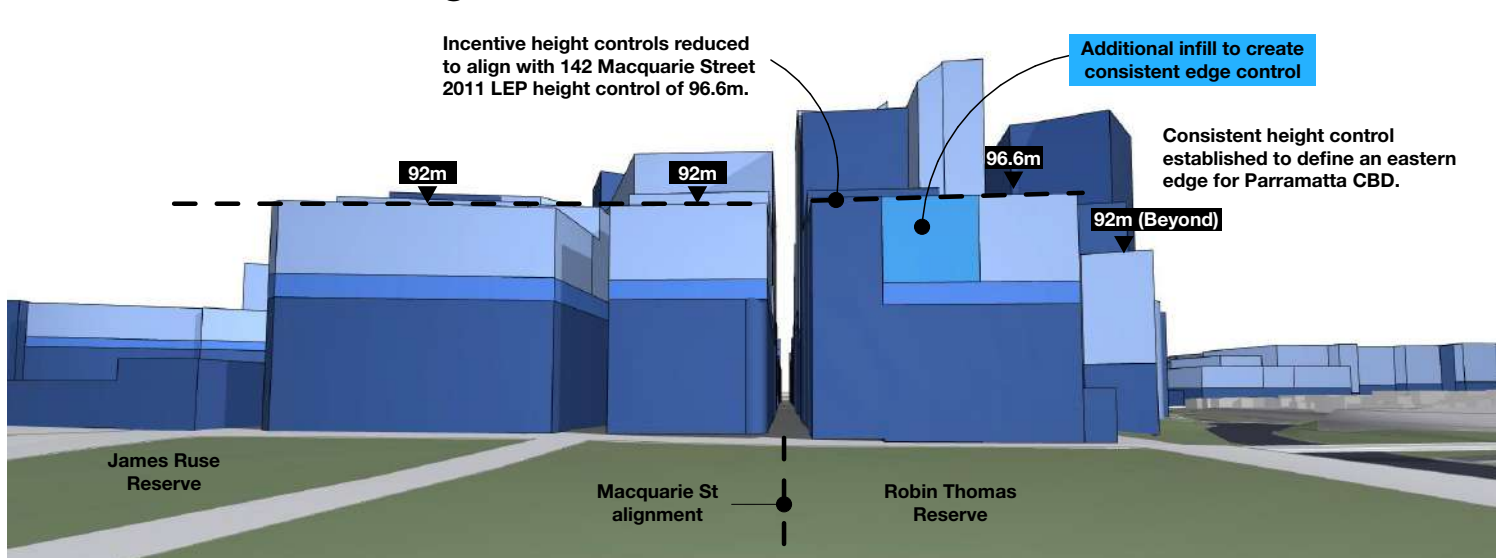
1. Planning Proposal Height Controls



2. Proposed Reductions in Height Controls

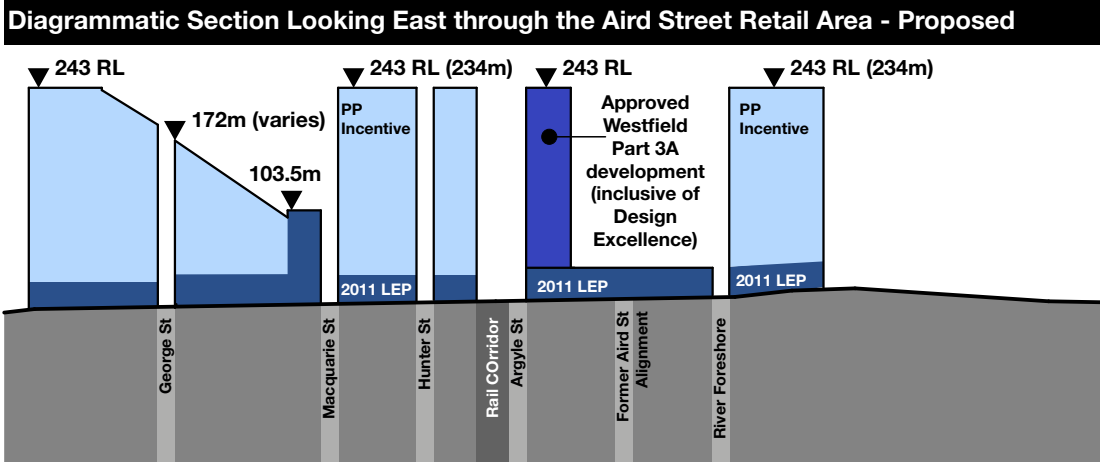
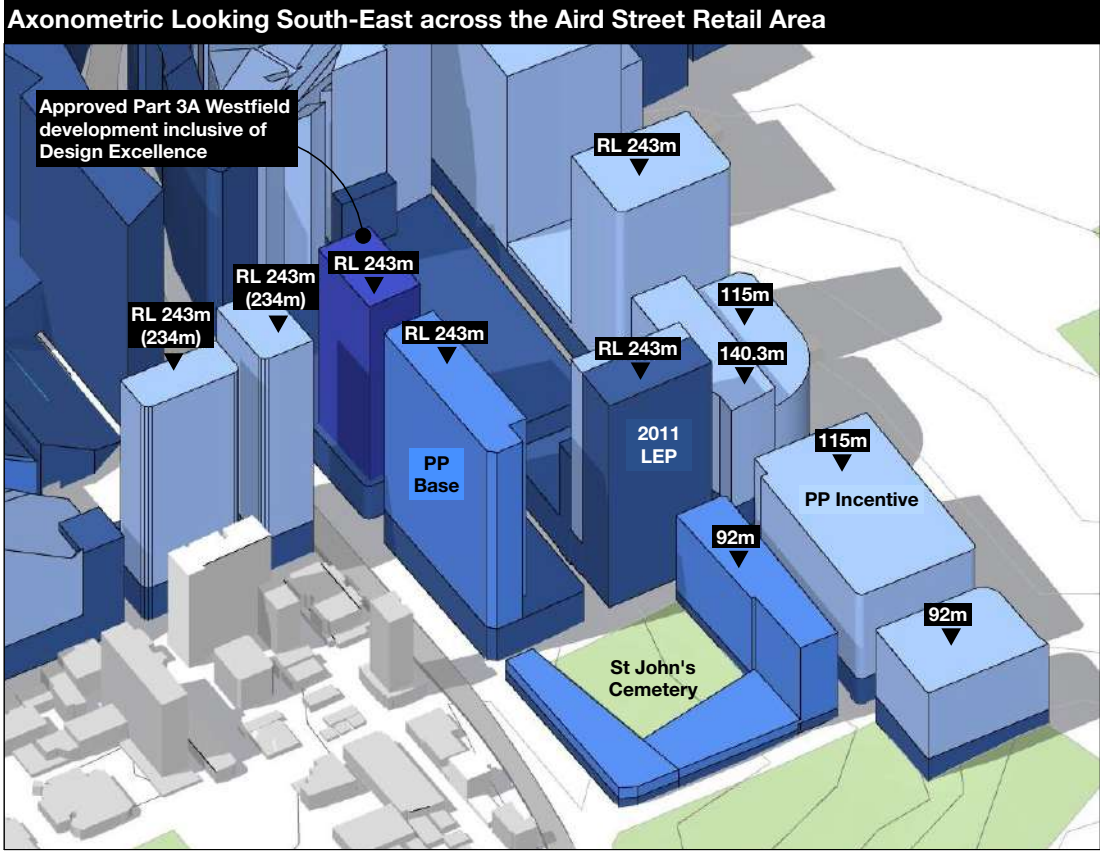


3. Recommended Height Controls



Aird Street Retail Area

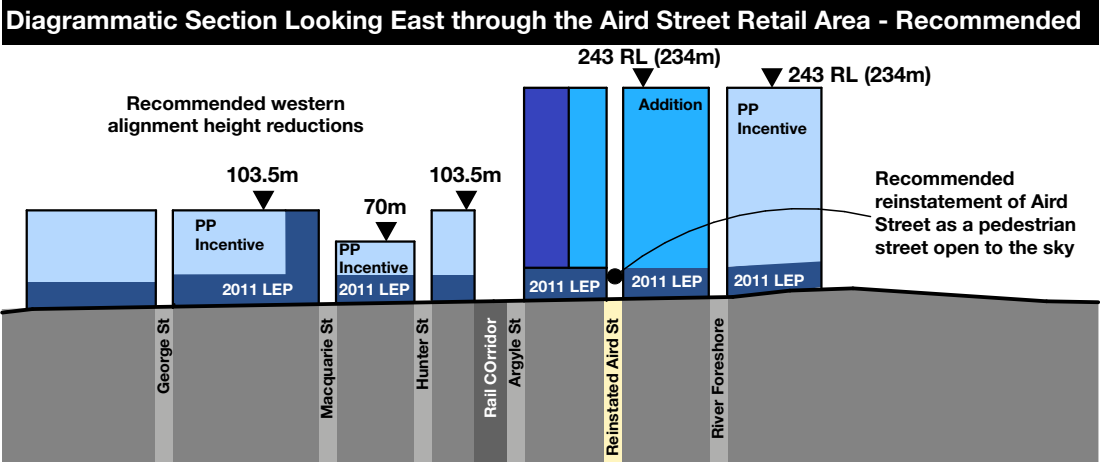
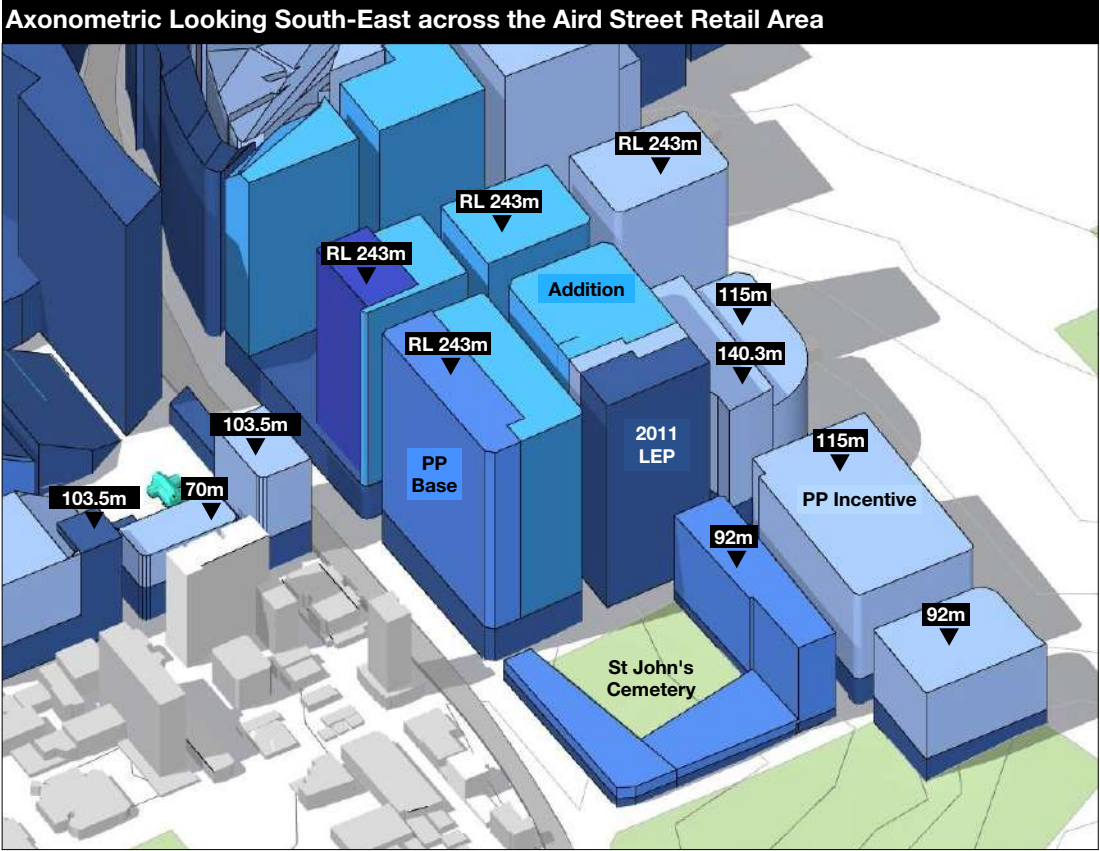
Planning Proposal Height Controls



Images of existing Westfield Retail Development



Recommended Height Controls



Observations

The Aird Street Retail Area, including the Westfield sites, was identified in the CBD Planning Strategy 2015 as an area to expand the B3 Commercial Core zoning. The initial version of this Planning Proposal included this recommendation but was subsequently modified to retain the Mixed-Use zoning across the majority of the area.

This area is located adjacent to the existing rail station and the recent development of Parramatta Square. It is an ideal location for commercial development and forms a logical extension of the commercial core.

Substantial heights have been proposed to the north, south, east and west of this area as part of this Planning Proposal. A tower of an equivalent height was approved for the north western corner of the Westfield Site. The overshadowing impacts of these towers appears to comply with the open space solar protections outlined within the LEP and DCP.

While the need for retail facilities in the CBD is clear, the typology of the current shopping centre is not appropriate for the future ambitions for Parramatta as a metropolitan centre.

The proposed Parramatta DCP illustrates strategies to renew this area by reinstating Aird St within the Westfield sites and strengthening the existing series of arcades that sit within the mall. This initiative would provide greater opportunities to reconsider what is an appropriate type of retail environment for Parramatta as it shifts from a suburban centre to a metropolitan core.

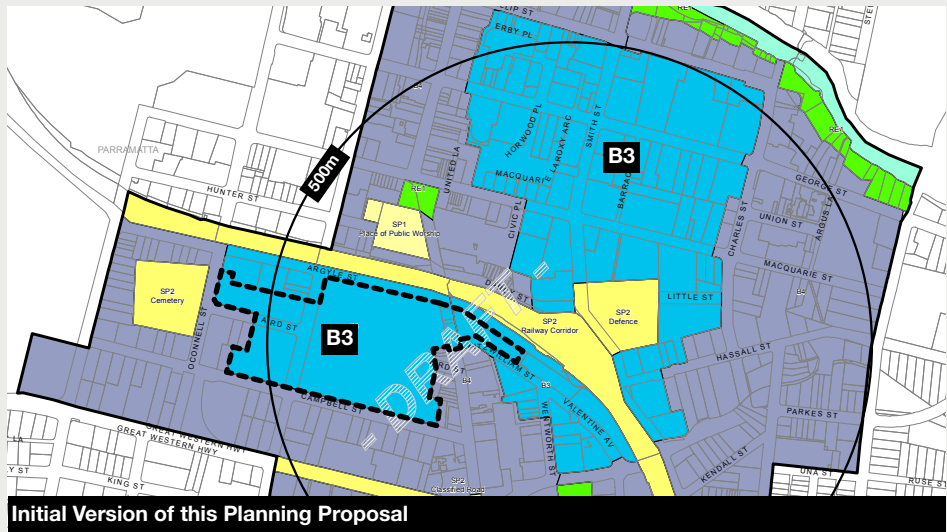
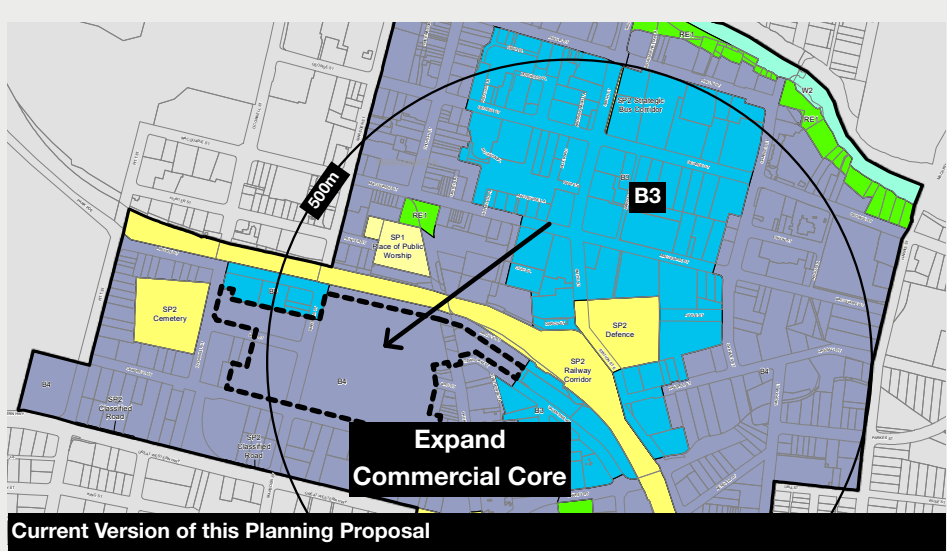
Recommendations

Rezone the area as B3 Commercial Core as per the CBD Planning Strategy 2015 and the initial version of this Planning Proposal.

Zoning heights should be increased to the maximum permissible control across these sites to encourage high quality commercial tower development. This increase in development potential will assist in rebalancing building heights and mass from the riverfront and Civic Link Area where a reduction in height controls has been recommended.

This increase in heights should be provided as incentives for urban renewal including the reinstatement of Aird St, improved urban connectivity and legibility, and the redevelopment of this shopping precinct as an integral and interconnected extension of the urban city structure. Detailed urban structure controls (similar to the controls developed for Aird Street) should be included within the LEP to provide greater certainty in urban outcomes.

Aird Street Retail Area - Land Zoning and Density Redistribution

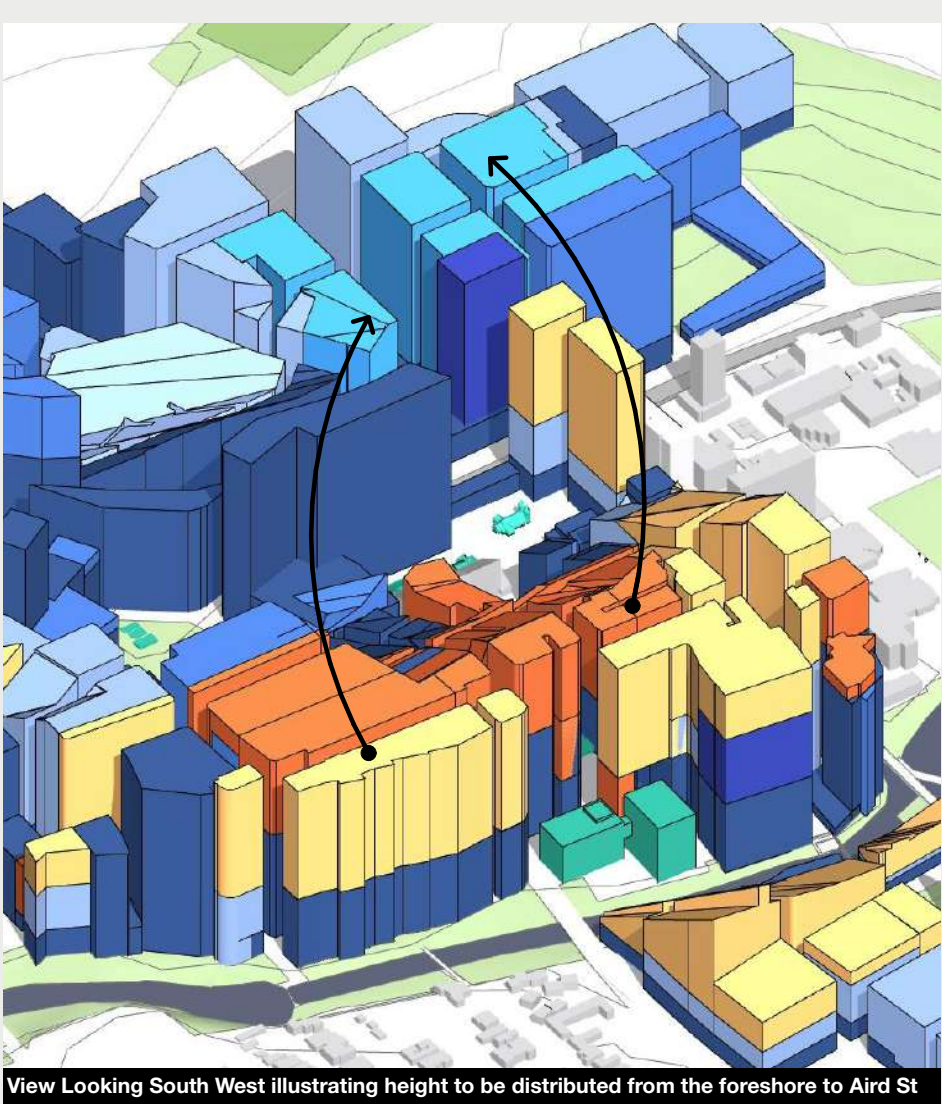


Commercial Core Expansion

Rezone the area as B3 Commercial Core as per the CBD Planning Strategy 2015 and the initial version of this Planning Proposal.

The area is located adjacent to the existing rail station and the recent development of Parramatta Square. It is an ideal location for commercial development and forms a logical extension of the commercial core.

The rezoning of this area provides long term commercial growth opportunities to support Parramatta's evolution as a metropolitan centre for Western Sydney.

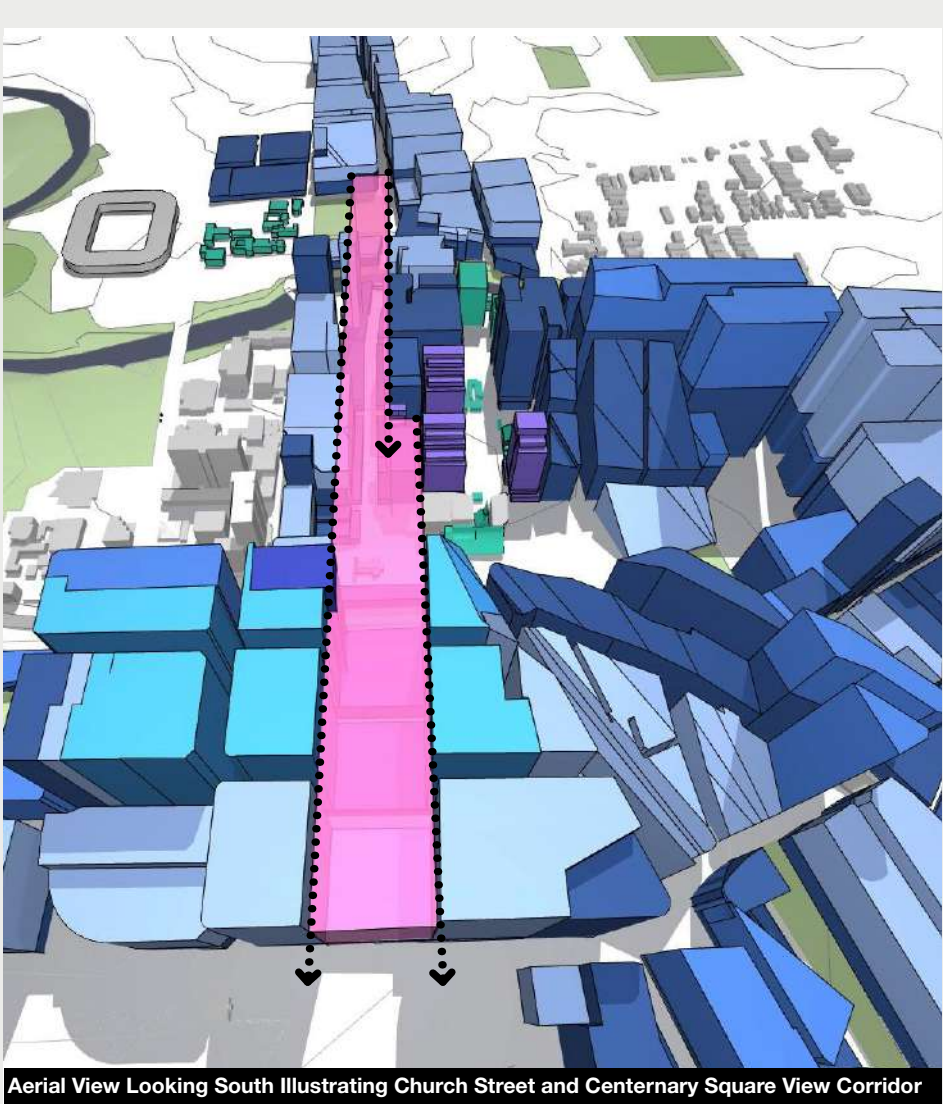


Redistributed Density

Zoning heights and incentives should be increased to the maximum permissible control across these sites to allow and encourage high quality commercial tower development.

This increase in development potential will assist in rebalancing mass and heights from the riverfront and Civic Link area where a reduction in height controls have been recommended to alleviate the development impacts on sensitive and significant areas.

The increase in development opportunities provides further opportunities to develop high quality commercial office space to meet strategic employment targets.



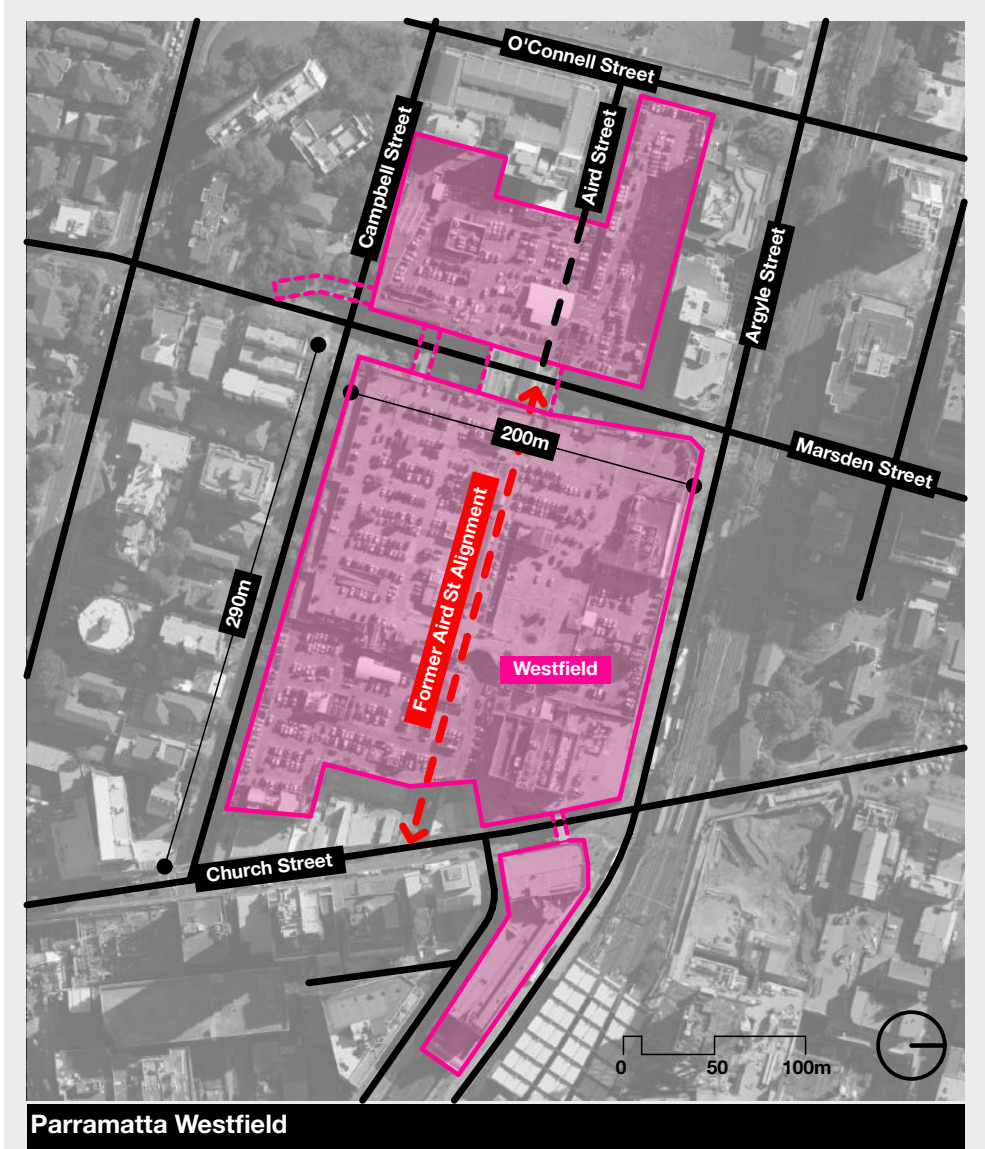
Church Street View Corridor

Any increases in height should respect the established view corridors that extend south from Church Street and Centenary Square.

The proposed massing aligns with the proposed heights and alignments for sites to the south, north and west.

Confirm the viability of this proposal with detailed heritage, solar and view analysis.

Aird Street Retail Area - Typology and Urban Structure

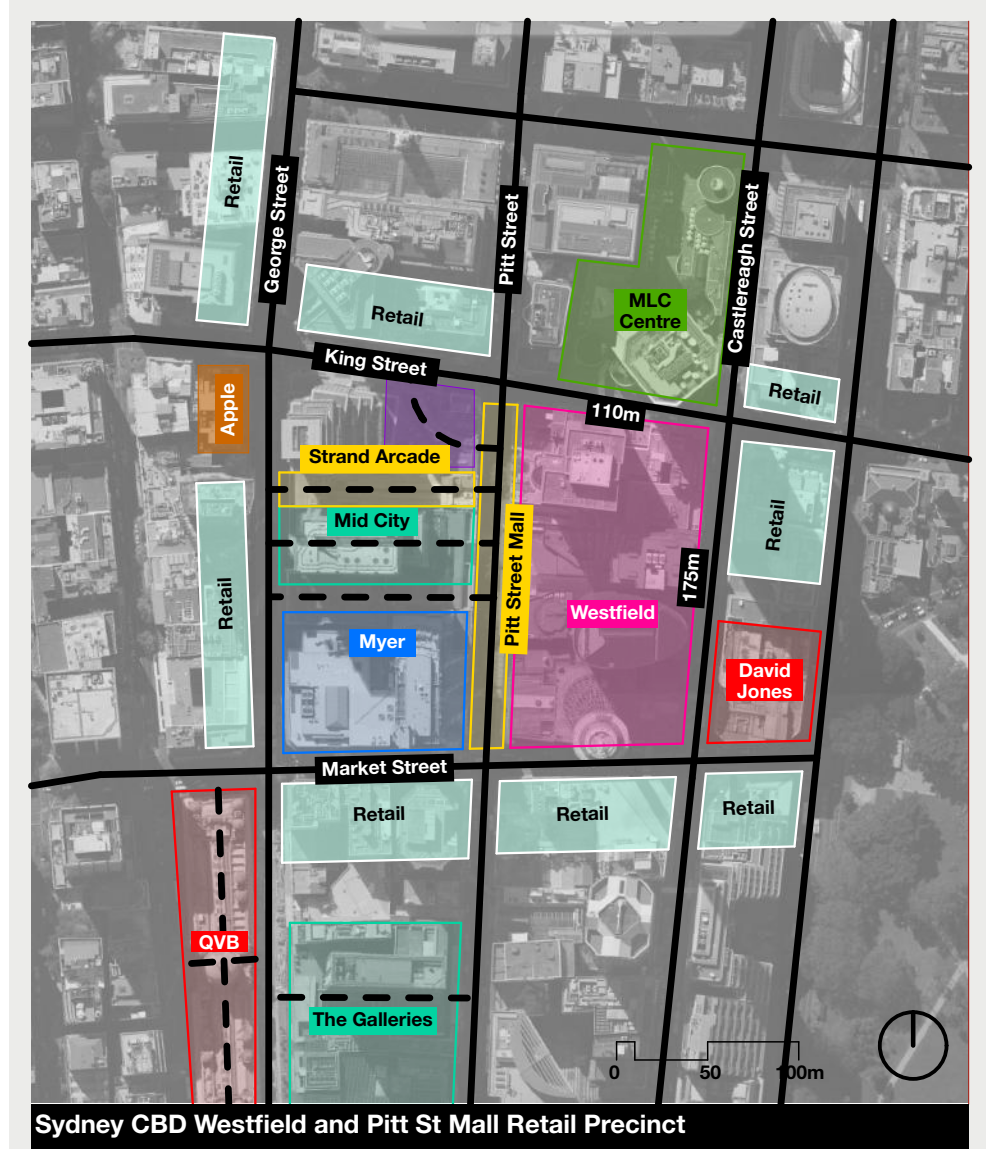


Existing Retail Typology

While the need for retail facilities in the Parramatta CBD is clear, the typology of the current Westfield shopping centre is not appropriate for the future ambitions for Parramatta as a metropolitan centre.

The mall is internalised and remains largely unintegrated with the surrounding urban fabric resulting in poor legibility and CPTED concerns. The built form extends across 5 city blocks including the alignment of Aird Street, and extends over O'Connell Street with a large bridging structure.

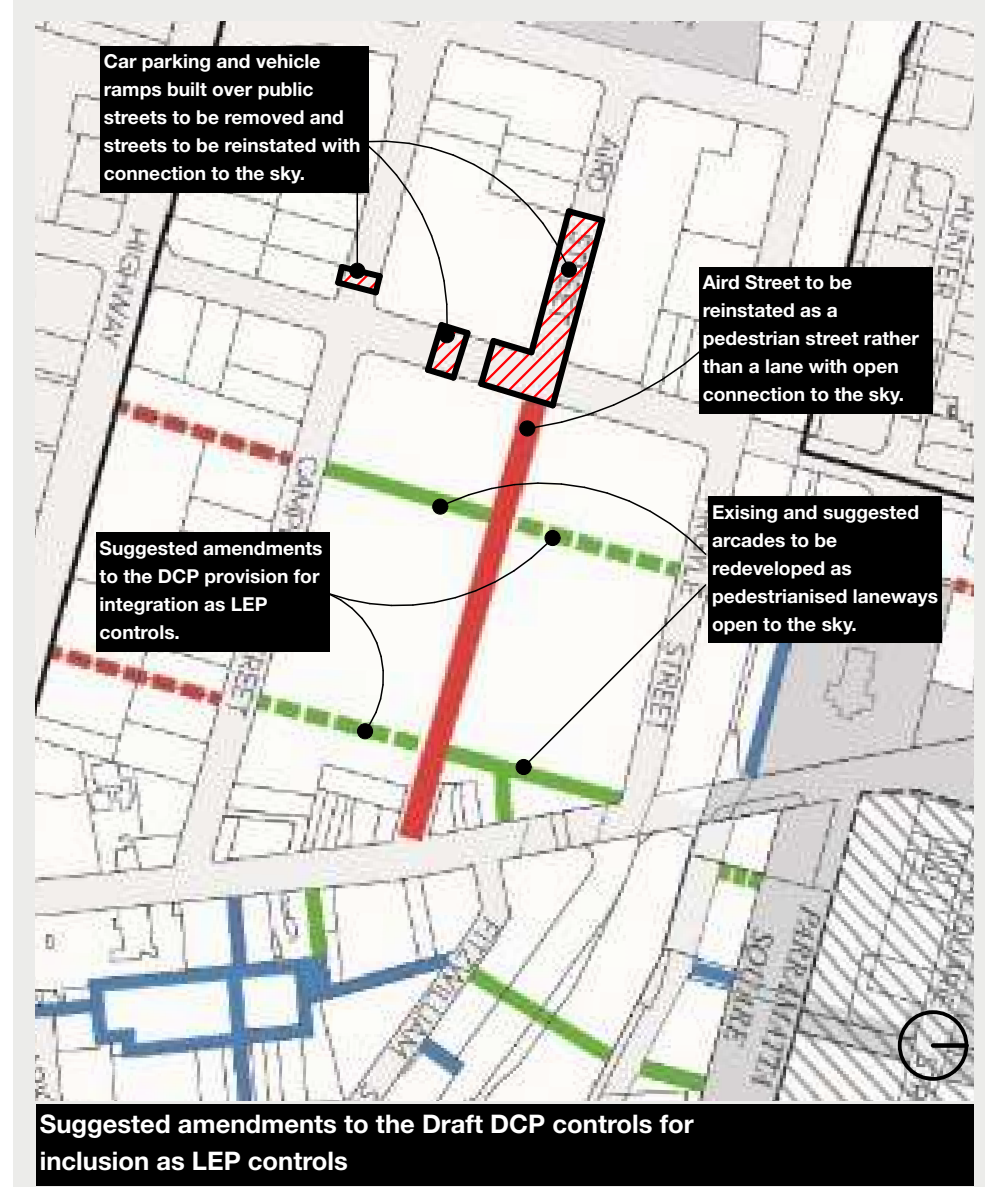
The existing quantum of car parking will create significant traffic impacts with the extent of development projected for the CBD, and should be reconsidered given the level of government investment in public transport for Parramatta.



Rethinking Retail Typologies

The Sydney CBD Westfield provides a useful example of a retail development that is successfully integrated within a dense and well established urban structure.

A series of interlinked malls, shopping arcades, department stores, food courts and commercial towers are integrated into the urban realm and provide a valuable contribution to the urban activation, social amenity and commercial functions of the city. Similar models should be considered for Parramatta as it evolves into Sydney's second CBD.

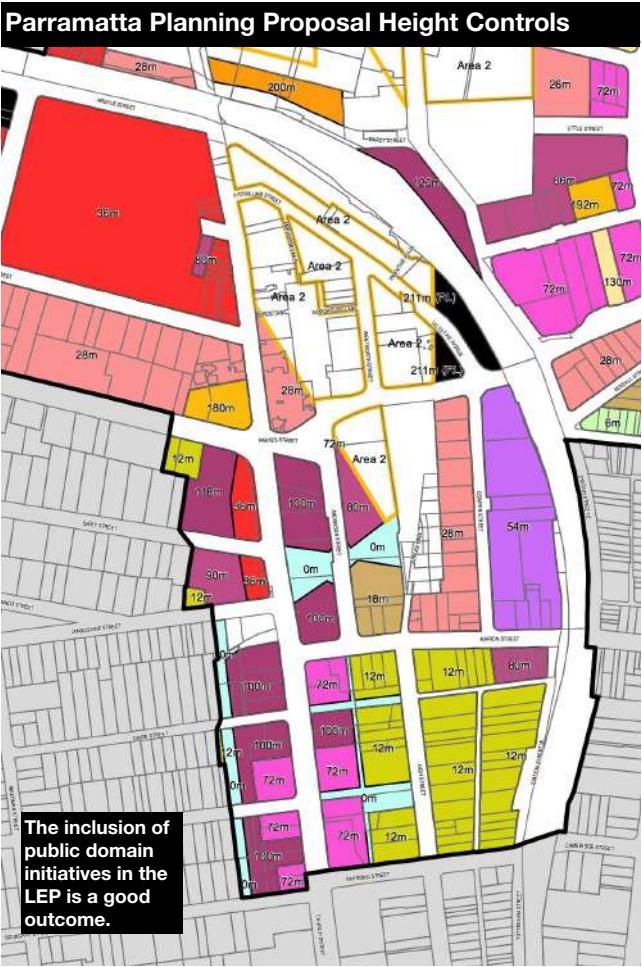
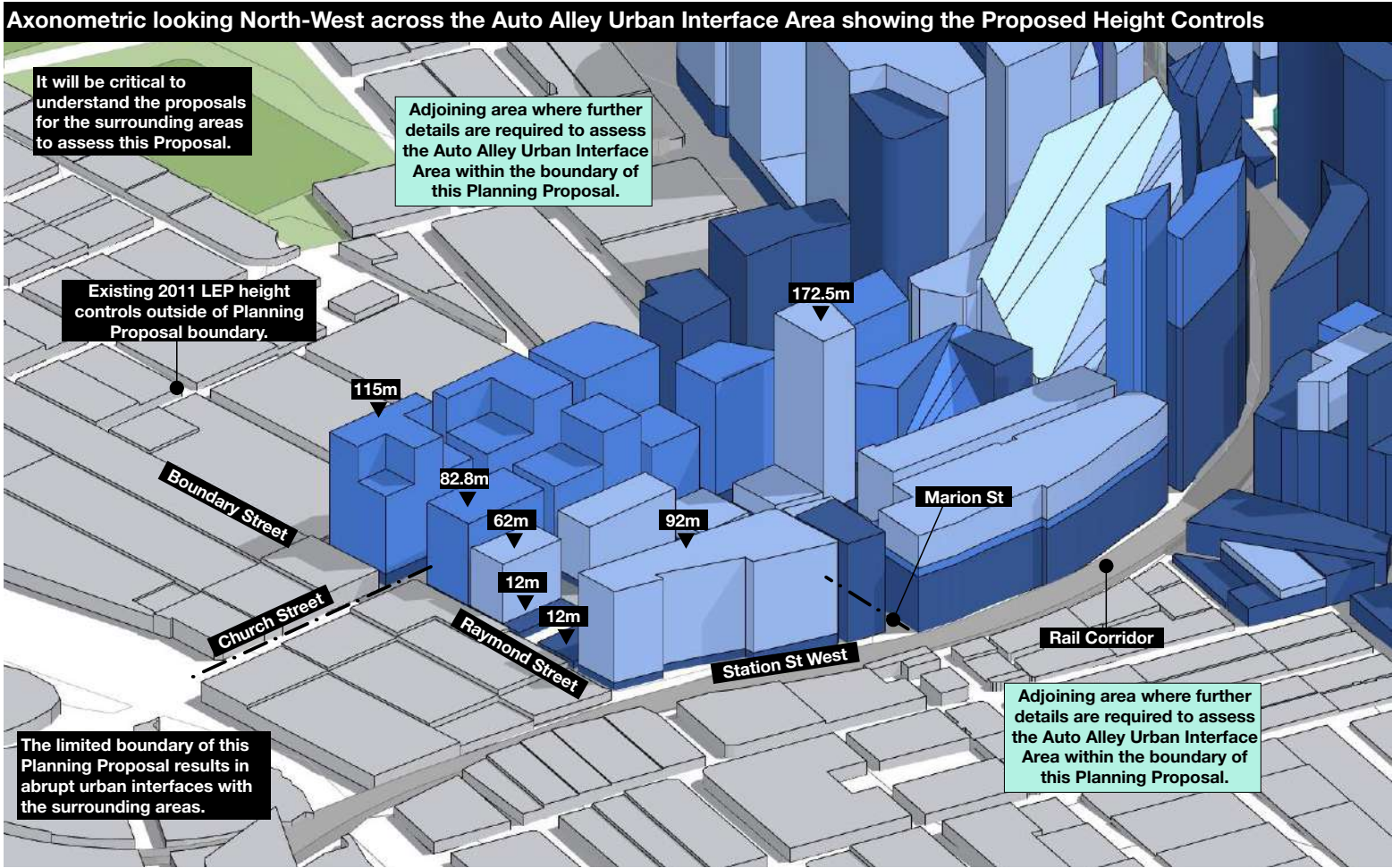


Reinstating Urban Structure

This proposed increase in heights could be provided as incentives for urban renewal including the reinstatement of Aird St, the removal of the O'Connell St/ Aird Street bridge, improved urban connectivity, and the redevelopment of this shopping precinct as an integral, legible and interconnected extension of the urban city structure.

The proposed Parramatta DCP provides guidance in this regard and should be used as a base to develop detailed LEP controls (similar to the controls developed for Aird Street) to provide greater certainty in urban outcomes.

Auto Alley Urban Interface Area



Observations

The proposed controls for Auto Alley appear to be carefully considered and will result in additions and improvements to the public domain including new streets, plazas and parks. These initiatives will assist in supporting the resulting increases in density.

It is important to note that in this instance, these public domain initiatives have been integrated as detailed LEP controls. This inclusion should provide greater certainty in urban outcomes.

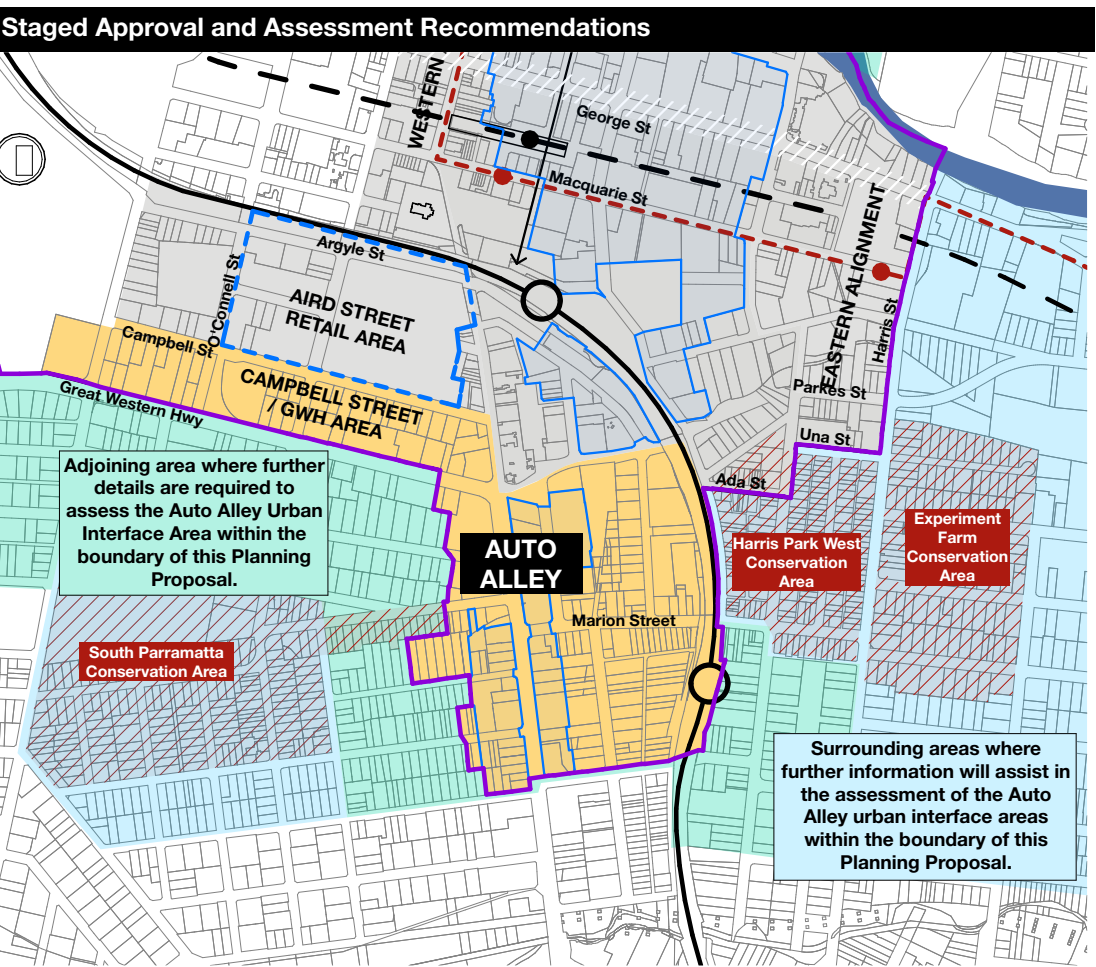
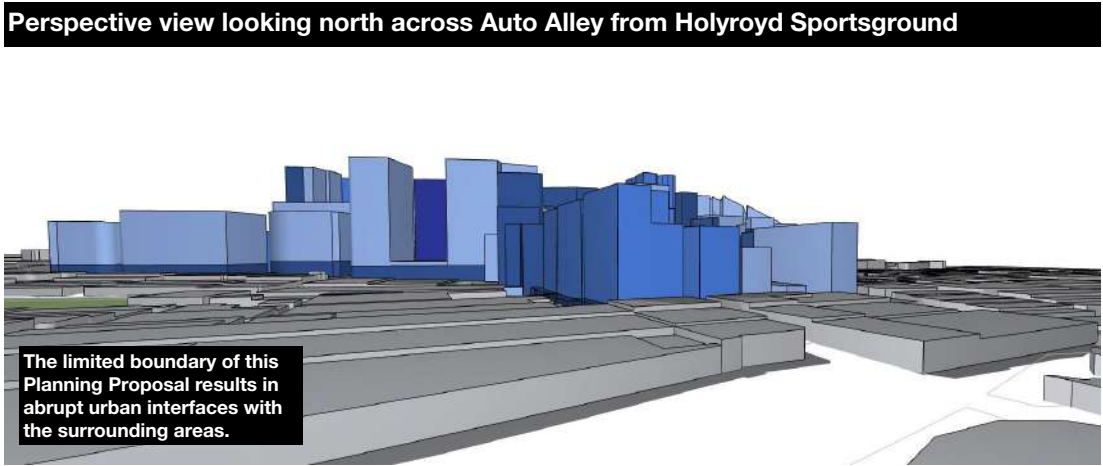
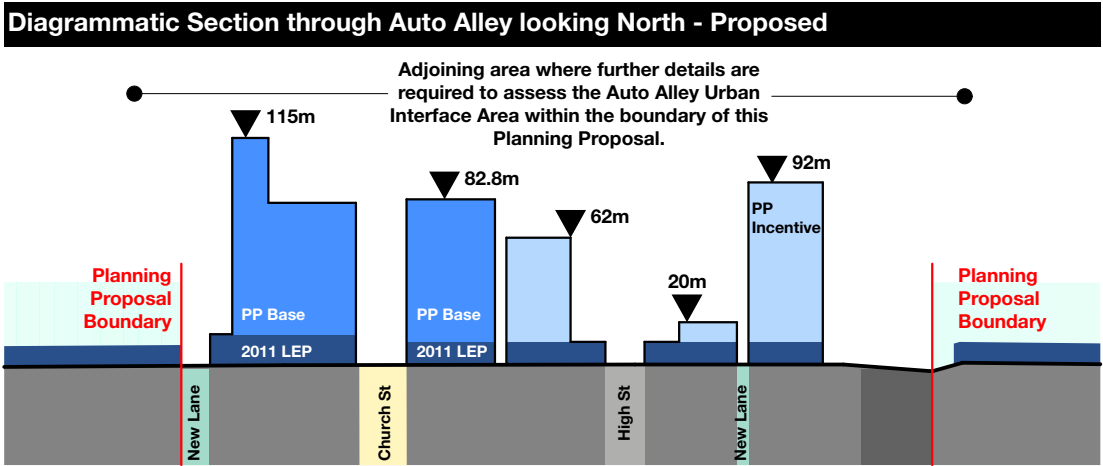
It is critical to assess these controls in relation to the controls proposed for the adjoining urban areas, particularly to the west, where they will form an important urban interface between the heights proposed for Auto Alley and low scale heritage conservation areas. It will also be important to understand wider strategies to expand and integrate the public domain and improve urban structure.

As the proposals for these areas are not currently available, it is not possible to assess the proposed LEP controls for Auto Alley until further progress has been made on developing controls for the adjoining areas.

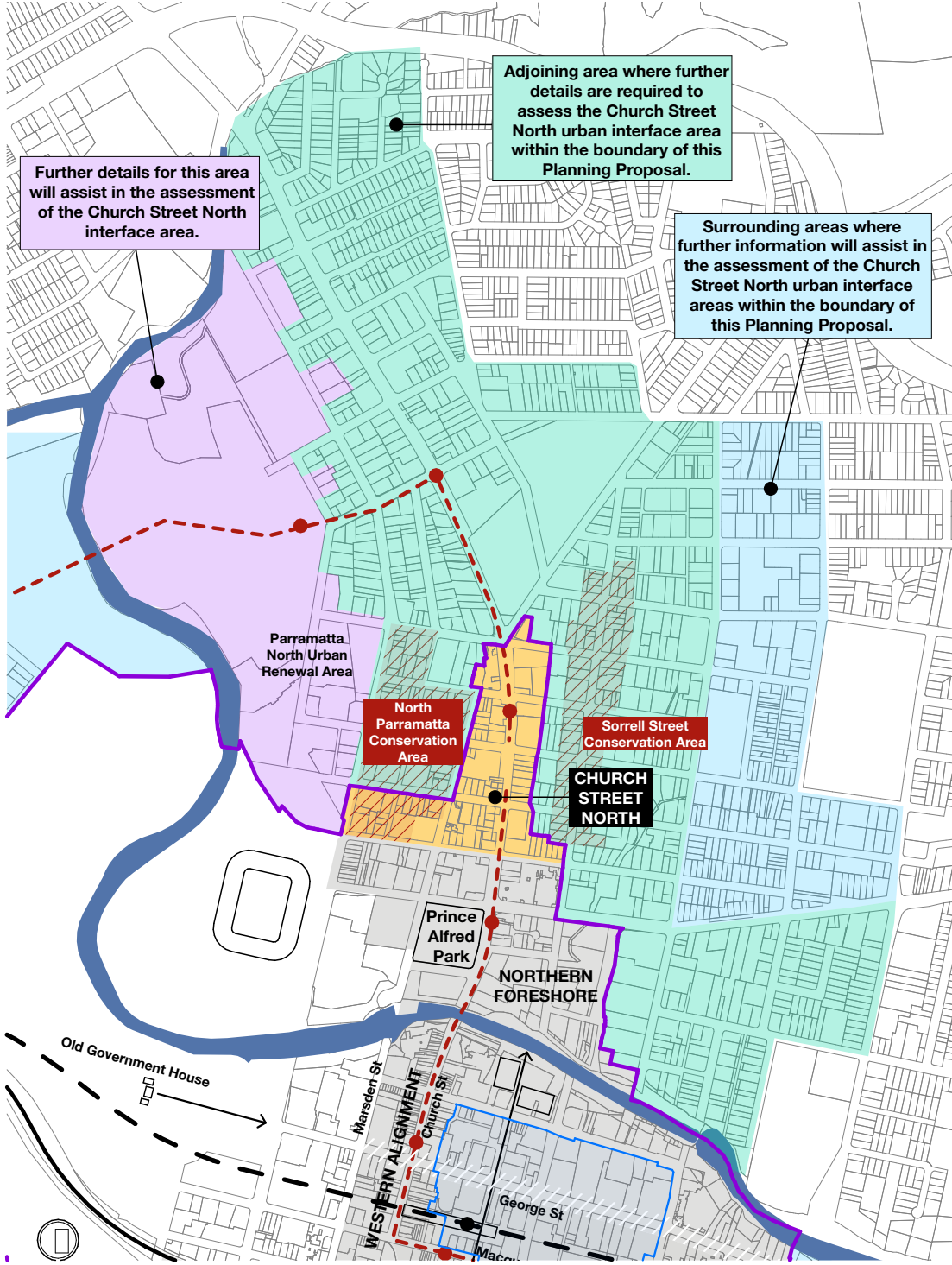
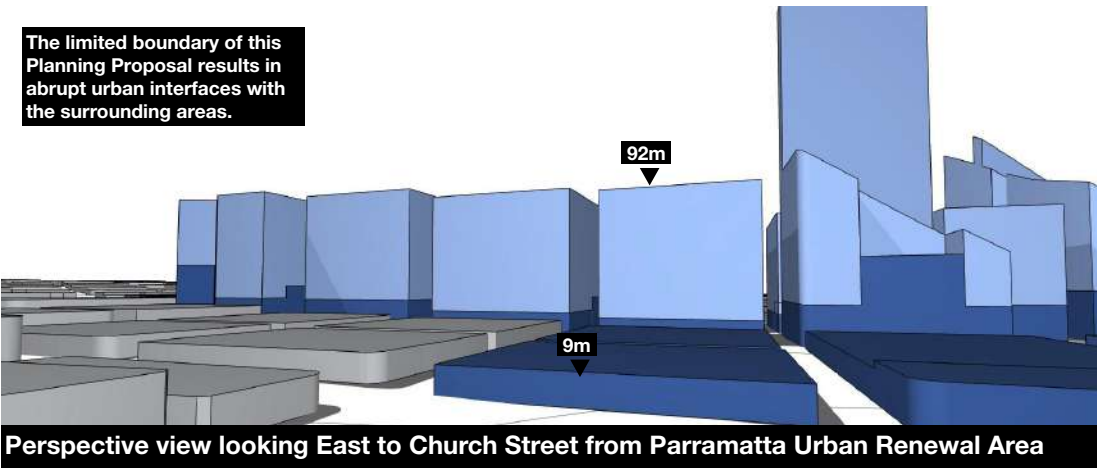
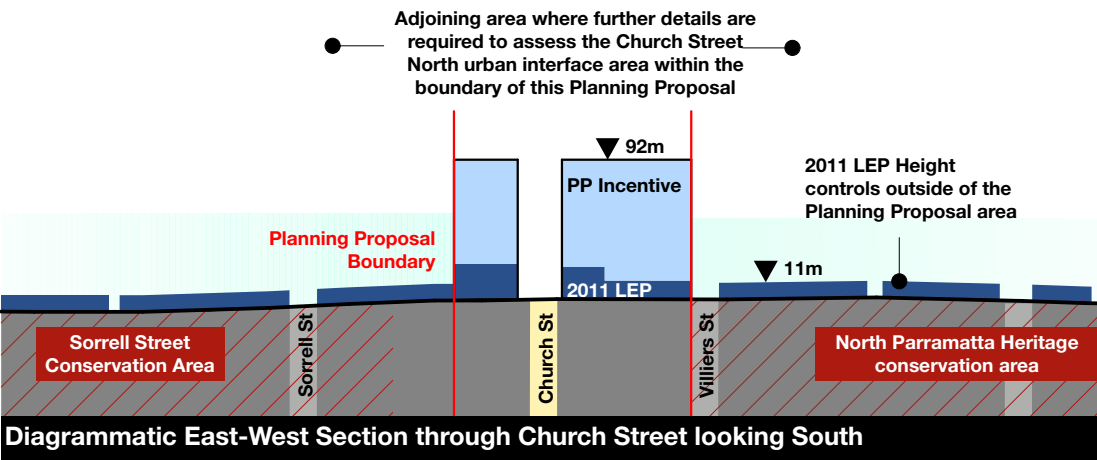
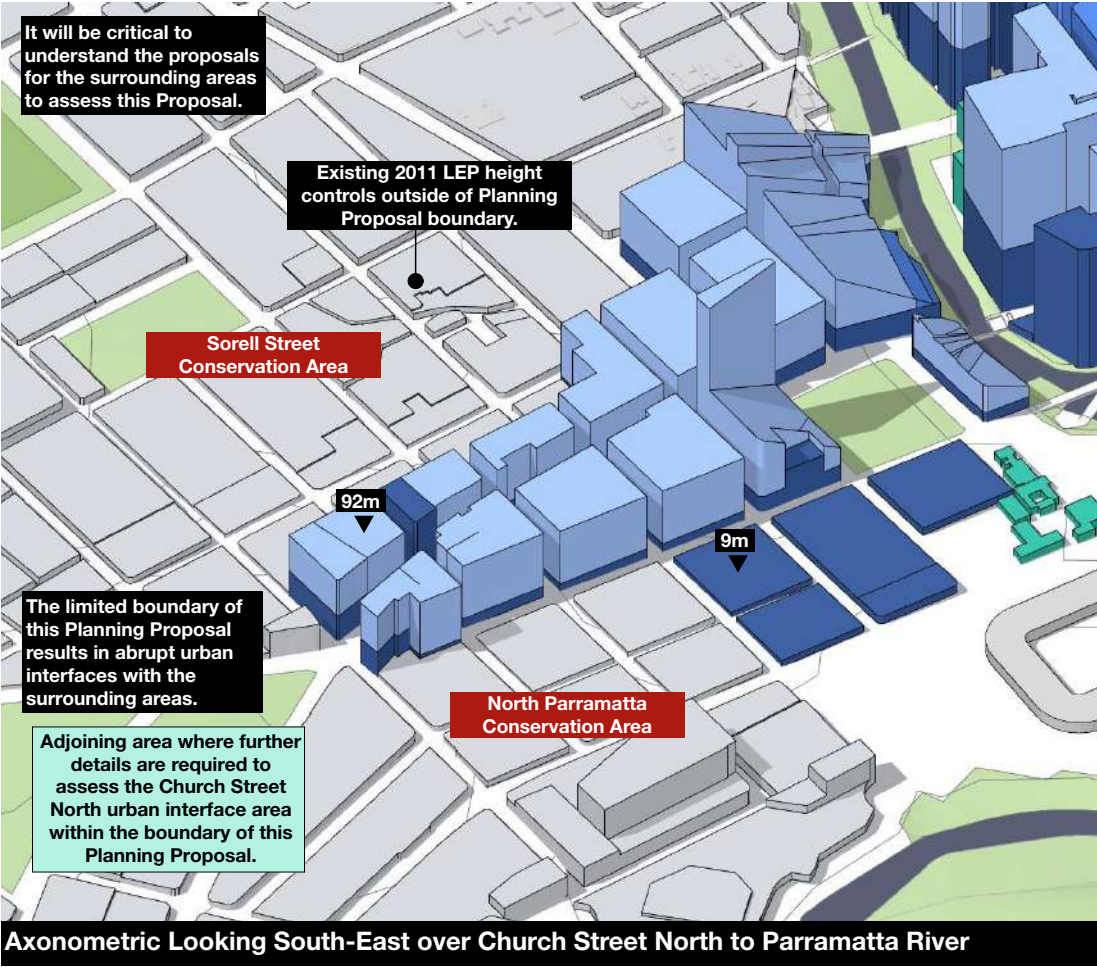
Recommendations

Develop planning controls for the adjoining urban areas to demonstrate a considered and integrated approach to development in the area around Auto Alley to enable an informed assessment of this Planning Proposal.

This will include understanding proposed land uses, transitions in scale and character, overshadowing impacts, wider public domain and urban initiatives, the establishment of open space networks, and consideration of a greater diversity in commercial and housing building typologies to differentiate these areas from the city centre.



Church Street North Urban Interface Area



Observations

The location of density along the new PLR corridor is a logical strategy that supports the development of Greater Parramatta, but the narrow boundary of this Planning Proposal makes it difficult to assess what the impacts or benefits of development uplift will be for the adjoining and wider areas.

It will be critical to assess these controls in relation to these areas particularly where they mediate between the substantial heights along Church Street North and sensitive heritage conservation areas.

The inclusion of substantial incentive heights along Church Street North as an amendment to the initial Planning Proposal will require further consideration of these impacts on the wider areas, and specifically around Prince Alfred Park which is historically and culturally significant.

It is likely that planning studies for the Parramatta North Urban Renewal Area and the Planning Investigation Areas identified in the CBD Planning Strategy have been progressed since the initial submission of this Planning Proposal. Information about these areas should be made available or obtained to inform the assessment of this proposal, or be amalgamated into a wider and more comprehensive Planning Proposal for the area north of Parramatta River. The reliance on incentives and site amalgamation along Church Street North could result in a lack of fine grain development and a limited range of housing and commercial typologies.

Recommendations

An expanded Planning Proposal Boundary should be explored to determine the best arrangement of density north of Parramatta River along the PLR corridor to take full advantage of this public transport initiative and to distribute growth and density in a more holistic and considered approach.

Develop or confirm the planning controls for the adjoining and wider urban areas to demonstrate a considered and integrated approach for development in the area around Church Street North and to enable an informed assessment of this Planning Proposal. This will include an understanding of proposed land uses, transitions in scale and character, overshadowing impacts, wider public domain and urban initiatives, the establishment of open space networks, and consideration of a greater diversity in commercial and housing building typologies to differentiate these areas from the city centre.

Further consideration should be given to the area around Prince Alfred Park including the transition to the river frontage and the height incentives proposed for Church Street North.

Ongoing Review and Assessment

This review process was undertaken as a rapid assessment to identify whether there are any areas where the proposed controls should proceed to finalisation as proposed or with minor changes that would not trigger further exhibition.

The assessment has recommended:

- an area suitable for approval,
- areas where further information is required to inform the assessment process, and
- areas where alternative planning controls should be considered to alleviate development impacts on sensitive natural, cultural and historic areas.

Preliminary recommendations have been included with this assessment, however these recommendations will require further detailed investigation and specialist consultant input to test and confirm what the most appropriate controls should be.

The range of specialist consultant input required is likely to include:

- **Statutory and Strategic Planning**
- **Landscape Architecture**
- **Urban Design Peer Review**
- **Heritage Architecture**
- **Land Economist**
- **Market and Feasibility Analysis**
- **Solar, Skyview, Daylight and View Impact Analysis**
- **Wind Analysis**
- **Flood Assessment**
- **Traffic and Transport**

