



**Office of
Environment
& Heritage**

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Parramatta City Council
PO Box 32
PARRAMATTA NSW 2124

Attention: Felicity Roberts

Exhibition of Planning Proposal for 20 Macquarie Street, Parramatta

Dear Ms Roberts,

I refer to your letter dated 12 December 2018, requesting input from the Office of Environment and Heritage (OEH) on the planning proposal for 20 Macquarie Street, Parramatta.

The Planning Proposal seeks to amend the Parramatta Local Environmental Plan (LEP) 2011 to allow a significant increase in height and density to facilitate a mixed use residential, commercial and 5-star Hilton hotel development. Specifically, the Planning Proposal seeks to:

- increase the maximum building height from 36m to 90m to facilitate a 65 storey tower
- increase the maximum floor space ratio (FSR) from 4:1 to 10:1
- add site specific controls and
- allow a design competition bonus of 15% relating to Height and FSR to achieve 103.5m and FSR of 11.5:1 (Note: subject to the sun access provisions within Clause 7.4 of Parramatta Local Environmental Plan 2011 that aims to protect sunlight to Parramatta Square).

Please find in Attachment 1 OEH comments.

Should you have any queries regarding this matter, please contact Svetlana Kotevska, Senior Conservation Planning Officer on 8837 6040 or at Svetlana.kotevska@environment.nsw.gov.au.

Yours sincerely

S. Harrison 21/02/19

SUSAN HARRISON
Senior Team Leader Planning
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Attachment 1 – Office of Environment and Heritage (OEH) comments - Exhibition of Planning Proposal for land at 20 Macquarie Street Parramatta

Background

On 11 April 2016, Council endorsed the Parramatta CBD Planning Proposal ('CBD PP') that would establish development controls across the entire CBD area and give effect to the vision that Parramatta CBD would develop into Australia's next great city. The Planning Proposal provides for an expanded and more intense commercial core to strengthen and facilitate the role of Parramatta as Sydney's Central City supported by higher density mixed use developments that will provide capacity for an additional 48,475 jobs and 19,362 dwellings. The CBD PP proposed that increases in height and FSR can be sought for sites within the Parramatta CBD subject to the provision of community infrastructure and aviation limits. The CBD PP has no maximum building height limit and a maximum 10:1 Floor Space Ratio (FSR) for the majority of sites within the CBD area while the interface areas have lower FSR controls.

Aboriginal Cultural Heritage

The Heritage Impact Statement states "The current building was completed in 1964 and does not have a basement, although it does have lift shafts on the eastern side of the building. During foundation works for the current building, coins dated 1816 and 1880 were found by workmen excavating among the convict-built foundations....The subject area has little or no potential to contain intact subsurface deposits. The construction of the existing building on the site would have significantly disturbed any archaeological deposits in this area. This AMU has no archaeological significance. Based on the history of the site, as well as the fact that there were archaeological relics on the site during the 1960s, we have determined that there is a moderate potential for historical archaeological material to be present on site. If present, archaeological material is most likely to be uncovered in areas that have not been subject to extensive redevelopment such as the northern portion of the site which is occupied by a one storey building. The foundations required for the construction of the multistorey portion of the site are likely to have required extensive ground disturbance."

The Planning Proposal states that "Heritage-related issues will require consideration in future development applications."

As Council is aware, the site is in an area of high Aboriginal archaeological sensitivity where there are a number of existing and potential sites of Aboriginal significance particularly near creeks and the Parramatta River. OEH records indicate the presence of known Aboriginal sites nearby to the site.

The *Parramatta CBD Heritage Study* prepared by Urbis to inform the Parramatta CBD planning proposal dated December 2015, states that the Parramatta CBD "comprises numerous registered Aboriginal sites and a large portion of the CBD area is affected by the Parramatta Sand Body, which contains substantial and potentially ancient (Pleistocene) archaeological evidence of Aboriginal occupation and is an area of High Aboriginal Archaeological Sensitivity. Archaeological investigation of the sand body has uncovered a substantial archaeological record that has contributed to our understanding of pre-colonial Aboriginal occupation of the Parramatta area and more broadly, the Cumberland Plain. In addition to the archaeological and geomorphic research value of the sand body, the Parramatta Sand Body also has the potential to provide valuable insight into the natural environment of Parramatta CBD in pre-colonial times" (refer to section 5.13.2).

There is likely to be significant future excavation to facilitate the proposed tower and five levels of basement car parking that is likely to impact on Aboriginal archaeology.

Given the above, OEH strongly recommends that an Aboriginal cultural heritage assessment be undertaken to inform the planning proposal and include:

- an archaeological assessment – involving the identification and assessment of Aboriginal objects (often referred to as 'sites') and their management based on archaeological criteria; and

- a cultural heritage assessment – involving consultation with Aboriginal stakeholders (groups and individuals) and can include historical and oral history assessment and broader values assessment (e.g. landscape and spiritual values).

OEH also notes that the planning proposal refers to the *Section 9.1 Ministerial Direction 2.3 Heritage Conservation*. The planning proposal states it is consistent with this Direction. However, the planning proposal does not refer to any Indigenous Heritage Study that has been completed for this site to be able to confirm that Aboriginal Heritage has been adequately considered, protected or the impacts mitigated.

Sustainability and Building Design

It is noted that the *Parramatta CBD Planning Strategy* adopted by Parramatta City Council on 27 April 2015 includes the following principles that are relevant to this planning proposal:

- P4 Create a liveable, active and highly desirable city.
- P8 Celebrate heritage and the natural environment.

Further, the *Parramatta CBD Planning Review Sustainability and Infrastructure Study* identifies opportunities for high performance buildings and energy and water savings. OEH is supportive of the abovementioned principles and opportunities to improve sustainability identified in the Council's studies and strategies.

It is noted that the proposed DCP includes site specific provisions and objectives and controls relating to Built Form, Design and Massing and design excellence. However, this DCP is silent with regard to a future development proposal achieving sustainable design excellence which should be added as a requirement consistent with Council's strategies and studies outlined above. OEH suggests that the planning proposal should be revised to detail its consistency with these strategies/studies and detail its sustainability measures in a supporting DCP and/or Voluntary Planning Agreement (VPA).

Further, OEH recommends the development incorporate green walls, green roof and/or a cool roof into the design. The benefits of Green Roofs and Cool Roofs are outlined in the *OEH (2015) Urban Green Cover in NSW Technical Guidelines* which can be found at the following link:
<http://climatechange.environment.nsw.gov.au/Adapting-to-climate-change/Green-Cover>

Green roofs are important given the two-fold increase in population growth earmarked for the Parramatta CBD because of the significant new developments particularly in an area with limited green space as noted in Council's *Sustainability and Infrastructure Study* (Section 2 Pg 21).

Further, the planning proposal makes no mention of the Sustainability priorities and strategies in the Central City District Plan (March 2018). *Planning Priority N16: Increasing urban tree canopy cover and delivering Green Grid connections* is relevant. To achieve this priority the District Plan identifies opportunities for green grid connections and outlines the NSW Governments target to increase tree canopy cover across Greater Sydney to 40 per cent. The planning proposal needs to detail how it is proposed to be consistent in this regard.

Tree Protection

The mature street tree needs to be protected and any future works must ensure that the Tree Protection Zone is not impacted. This should be detailed in the development control plan for the site.

Coastal Zone Management Plan

The Parramatta River Estuary Coastal Zone Management Plan (CZMP) dated 2013 and adopted by Parramatta City Council, incorporates a number of management actions that Council is required to implement. For example, the following management actions may be relevant to this Planning Proposal given that the site falls within the Parramatta River catchment and stormwater runoff from the site is likely to impact on the water quality and health of the River:

- When undertaking reviews of planning instruments or engaging in strategic land use planning, seek consistency with the Parramatta River Estuary CZMP and, where possible, update the relevant instrument as required.

- Develop provisions under Development Control Plans that provide for the incorporation of best practice WSUD and ecological connectivity along the estuary foreshores for sites subject to redevelopment.

The above is also supported by Parramatta City Council's study titled the *Parramatta City River Strategy Design and Activation Plan* prepared by McGregor Coxall (2015) that states "*The Environment Initiatives Plan establishes a rejuvenated and cleansed river corridor that aims to improve Parramatta River's water quality and natural environment. The plan considers primary wetlands, stormwater treatment systems, a multifunctional Water Square and a softening of the river corridor through riparian planting*".

Further, a Sustainability priority in the Central City District Plan (March 2018) includes *Planning Priority N13: Protecting and improving the health and enjoyment of the District's waterways*. There is no detail in this planning proposal regarding managing runoff and water quality, and sedimentation associated with the proposal or its consistency with this District Plans priority, the CZMP and Parramatta City River Strategy Design and Activation Plan.

The planning proposal should include provisions and design controls relating to sustainability including water sensitive urban design. OEH recommends these are reflected in DCP controls or a supporting Voluntary Planning Agreement.

Floodplain Risk Management

OEH is satisfied that this concept design incorporates the minimum habitable flood level above the FPL. Any underground garage should be protected from flood waters up to and including the PMF extent as in accordance with the Parramatta DCP (Section 2.4.2.1 P.15).

(END OF SUBMISSION)