

# Planning Proposal Report

245 Great Western Highway, South Wentworthville

The Wattles

On behalf of  
NRB Property Group Pty Ltd  
November 2022



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# 1 Introduction

This planning proposal has been prepared by *Mecone NSW Pty Ltd* (Mecone) on behalf of *NRB Property Group Pty Ltd* (the applicant and landowner), in support of the request to *Cumberland City Council* (Council) for the land known as 245 Great Western Highway, South Wentworthville (the site). The subject site comprises a single land parcel legally described as Lot 100 DP 878926.

The planning proposal is intended to support the redevelopment of the site for the purposes of a multi-level hotel and enable the long-term conservation and use of 'The Wattles', a heritage cottage located on the eastern side of the site, as a restaurant.

## 1.1 The Proposal

In order to achieve the envisioned outcome for the site, this planning proposal seeks to amend the Cumberland LEP 2021 (CLEP) for 245 Great Western Highway, South Wentworthville as follows:

- amend the maximum height of buildings from 9m to 27m on the western portion of the site
- introduce a floor space ratio control of 1:1
- add 'hotel or motel accommodation' as an additional permitted use (not exceeding 76 hotel/motel rooms and a gross floor area of 3,040 sqm)
- add 'restaurant or cafe' as an additional permitted use in Schedule 1.

The proposal is a site-specific response to the particular circumstances of the site's position, attributes and context. No change is proposed to the underlying R2 Low Density Residential zoning of the land. Multi dwelling housing and residential flat buildings are not permitted.

The Planning Proposal has been prepared in accordance with:

- Section 3.33 of the Environmental Planning and Assessment Act 1979 (the Act).
- The NSW Department of Planning and Environment's '*A guide to preparing Planning Proposals*'.
- Relevant Section 9.1 Directions.

This planning proposal provides the following information:

- A description of the site in its local and regional context.
- A statement of the objectives and intended outcomes of the proposed instrument (for changes to the CLEP 2021).
- An explanation of the provisions that are to be proposed to be included in the instrument (to change the CLEP 2021).
- The justification of strategic and site-specific merit for the proposed provisions (changes) and the process for their implementation including:
  - the suitable need for the planning proposal
  - the relationship and alignment to the strategic planning framework
  - consideration of environmental, social and economic impacts
  - adequacy of infrastructure

- relevant State and Commonwealth interests
- Proposed maps (with changes).
- Community consultation to be undertaken and considered.

## 1.2 The Concept

The planning proposal is supported by a concept design for the site prepared by White Star Development. The concept design envisions the following outcomes:

- part 4 and 6 storey hotel with rooftop dining on the western part of the site
- 76 hotel rooms and hotel facilities
- restoration of The Wattles house for adaptive re-use as a 'restaurant or cafe'
- single level restaurant facilities building linked to the rear of The Wattles
- reinstated heritage gardens around The Wattles and landscaping of the site
- basement and at-grade parking and loading
- potential for approximately 40 jobs in the hotel and restaurant
- 45% of the site maintained for deep soil planting
- separation of over 40m between the hotel building and The Wattles building.

## 1.3 Proponent and Project Team

The planning proposal has been informed by the following accompanying reports prepared by the project team:

Table 1 – Project Team	
Concept Design	White Star
Traffic Impact Assessment	Stantec
Heritage Impact Assessment	Sue Rosen Associates
Contamination Assessment	Douglas Partners
Noise and Air Quality Assessment	SLR
Planning Proposal	Mecone

## 2 The Site

### 2.1 Site Context

The subject site is located at 245 Great Western Highway, South Wentworthville, located within the Cumberland City Council LGA. It comprises a single lot legally described as Lot 100 in DP 878926.

The site is irregularly shaped and comprises approximately 4,775m<sup>2</sup> of land. The lot is effectively an island site surrounded by road infrastructure on all sides – the M4 Motorway to the south and west, M4 on-ramp to the east and the Great Western Highway to the north.

The site is largely disused, with a local heritage item known as 'The Wattles' located in the eastern portion and the remainder vacant. Until recently The Wattles house and eastern part of the site have been continuously used as a dwelling house.

The site benefits from proximity to Parramatta (1.8km), the Westmead Health and Education Precinct (1.2km), and the broader Greater Parramatta and Olympic Peninsula corridor. The site is readily accessible from the M4 Motorway, Great Western Highway, Cumberland Highway and Parramatta to Liverpool Bus Transitway (T-way).



**Figure 1.** Subject site aerial  
Source: Mecone Mosaic





**Figure 2.** Location of the site in the Central City District  
Source: Mecone

## 2.2 Site Description

The site is in an unusual position, being in an R2 Low Density Residential zone that is no longer immediately conducive to full-time low density residential accommodation, given its location between the Great Western Highway and the M4 Motorway corridor on all sides. It is effectively an island site, which is relatively disconnected from surrounding areas by the wide road corridors, in terms of visual relationship.

The table below provides a description of the subject site.

Table 2 – Site Description	
Item	Detail
Legal description	Lot 100 DP 878926
Total site area	4,775sqm
Shape	Irregular – ranging between 13m and 60m depth.
Frontage	Approximately 100m to the Great Western Highway.
Topography	Slopes on a south/south-westerly aspect.

Table 2 – Site Description

Existing buildings/ structures	<p>The south-eastern portion of the site contains a local heritage item – ‘The Wattles’ cottage, set back approximately 40m from the Great Western Highway. It is positioned between 12m and 15m from the M4 Motorway corridor and on-ramp, screened from view by vegetation on the perimeter of the site and within the road corridor. The rest of the site largely vacant and void of structures or landscaping.</p> <p>‘The Wattles’ is a brick and tile Victorian cottage with a hipped gable tiled roof. The roof features three small gabled dormers with timber bargeboards and four tall brick chimneys with a stepped course detail located on the east and west elevations. A verandah extends along the north, east and west elevations with a skillion roof supported on paired timber posts.</p> <p>The Wattles building is lower than the Great Western Highway and hidden from the road and M4 Motorway.</p>
Surrounding development	<p>On all four boundaries the site is surrounded by wide transport corridor land, being the M4 Motorway to the south and west, the Great Western Highway to the north and an east-bound on ramp providing access from the Great Western Highway onto the M4.</p> <p>The site is located within the Greater Parramatta and Olympic Park (GPOP) area in proximity to several strategic centres, tourist and entertainment facilities and health and transport infrastructure, including:</p> <ul style="list-style-type: none"> <li>• Parramatta CBD: Approx. 1.8km east</li> <li>• Westmead Transport Interchange: 1.2km north</li> <li>• Westmead Health and Education Precinct: 1.2km north</li> <li>• Merrylands Centre and Interchange: 2km south-west</li> <li>• Bankwest Stadium: 2km north-east</li> <li>• Wentworthville Leagues Club: 1.4km west</li> </ul>
Access and parking	<p>Vehicular access to the site is provided via an existing driveway off the Great Western Highway. A Transitway bus lane runs along the outside of the road adjoining the site, serving as a deceleration lane for turning into the site.</p>
Flooding	<p>The site is not identified as flood prone land.</p>
Heritage	<p>The south eastern portion of the site contains a local heritage item – ‘The Wattles’. The statement of significance for the site, listed as heritage item no. I244, relates to the heritage house as follows:</p>

Table 2 – Site Description

	<p><i>"The Victorian Residence, known as 'The Wattles' at 245 Great Western Highway, South Wentworthville, is locally significant for its historic, associative, aesthetic and rarity values. Built between 1851 and 1875 as a private residence, originally known as 'Willow Cottage' and later as 'The Wattles,' is historically significant through its associations with William Fullagar, one of Cumberland's prominent pioneer settlers and developers. The dwelling is historically significant as one of the earliest houses in the Cumberland LGA and is relatively rare. The item retains some aesthetic significance as a moderately intact early Victorian residence; however, this has been compromised to some degree by later alterations and removal of original fabric..."</i></p>
Consent History	<p>On 28 October 2010, Holroyd Council granted development consent to DA2010/93/1 for:</p> <p><i>Demolition of existing sheds and garages, construction of 48 room motel with basement carpark, and alterations to the heritage item 'The Wattles' for use in conjunction with the motel and associated site works.</i></p> <p>On 26 October 2015 a Building Inspection Report was carried out by Holroyd Council, confirming physical commencement of the works that activated consent DA2010/93/1.</p>

The photos below further depict the site and surrounding environment.



**Figure 3.** Site viewed from GWH looking south  
*Source: Google Maps*



**Figure 4.** Site viewed from GWH looking south east.  
*Source: Google Maps*



**Figure 5.** Site viewed from M4 onramp looking northwest.  
*Source: Google Maps*



**Figure 6.** Site viewed from intersection of onramp and GWH looking southwest.  
*Source: Google Maps*



## 2.3 Planning Background

### 2.3.1 Planning and Approvals History

On 28 October 2010 the former Holroyd City Council granted development consent to DA2010/93/1 for:

*Demolition of existing sheds and garages, construction of 48 room motel with basement carpark, and alterations to the heritage item 'The Wattles' for use in conjunction with the motel and associated site works.*

On 26 October 2015 a Building Inspection Report was carried out by Holroyd Council, confirming physical commencement of the works that activated consent DA2010/93/1. That consent relied upon the heritage incentive provisions under clause 5.10(10) of the LEP which provide the consent authority reasonable ability to "...grant consent to development for any purpose of a building that is a heritage item or of the land on which such a building is erected, or for any purpose on an Aboriginal place of heritage significance, even though development for that purpose would otherwise not be allowed by this Plan..." subject to satisfaction of specified considerations.

Discussions with Council including a Pre-DA meeting and subsequent advice from Council planners indicated that a Development Application for a further intensified use on the site under the current controls could not be supported and that a planning proposal to change the planning provisions would be necessary. This was particularly in relation to the built form outcome. The heritage item requires sufficient curtilage around The Wattles building, and the appropriate massing of building on the western half of the site would exceed the current 9m height standard.

Accordingly, this Planning Proposal has been prepared, in consultation with Council, to increase the building height and specifically permit 'hotel or motel accommodation' and 'restaurant or cafe', in order to enable the redevelopment of the site for the desired outcome.

Following consideration the initial draft proposal, Council indicated a preference for a maximum Floor Space Ratio to control building mass and density, and sought design rationale and testing for proposed controls. The concept design has been further tested to ensure that the proposed for a high-quality standard hotel with roof-top facilities and services is feasible within proposed maximum height of building and floor space ratio controls. The further design testing confirmed the rationale for the floor space ratio, but identified a need to increase heights to provide:

- high ceilings at ground level for foyer and facilities (4m floor-to-ceiling plus ducting)
- room for ducting and services (between ceiling and slab) on four hotel accommodation levels above ground floor
- sufficient flexibility for the design of the roof top dining/bar facilities that forms the sixth storey
- height for lift overrun and rooftop equipment such as air-conditioning plant, water tanks and solar panels

The proposal has been revised to propose:

1. **a maximum floor space ratio of 1:1** – based on the concept plan built form testing to ensure that the general extent of the eventual development would be substantially consistent with the concept envelope and:
  - not encroach on the separation / setting to The Wattles heritage house
  - not expand hotel room accommodation onto the largely 'open' sixth storey of the hotel building which is intended to be used for rooftop dining with open terrace bar.
2. **a maximum building height of 27m** – based on further design testing of the concept plan, and in response to the introduction of an FSR control which means that the height is no longer the primary control of building mass.

### 2.3.2 Current Zoning, Uses and Provisions

A summary of the current planning provisions that apply to 245 Great Western Highway, South Wentworthville under Cumberland LEP 2021 is provided in Table 1.

Table 3 – Current Provisions under Cumberland LEP 2021

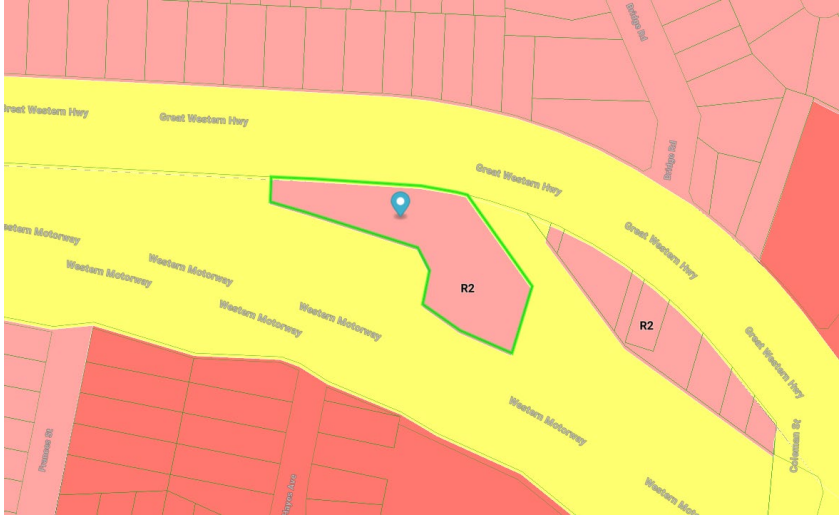
<p>Part 2 – Permitted and prohibited development</p>	<p>The land is zoned <b>R2 Low Density Residential</b></p>  <p><b>Figure 7. Zoning Map</b> (Source: Mecone Mosaic)</p>
	<p><b>R2 Low Density Residential</b></p> <p><b>1. Objectives of the zone</b></p> <ul style="list-style-type: none"> <li>• To provide for the housing needs of the community within a low density residential environment.</li> <li>• To <u>enable other land uses that provide facilities or services to meet the day to day needs of residents.</u></li> <li>• To encourage residential development that maintains the amenity of the surrounding area.</li> <li>• To ensure that <u>non-residential land uses are located in a setting that minimises impacts on the amenity</u> of a low-density residential environment.</li> </ul> <p><b>2. Permitted without Consent</b></p> <p>Home occupations</p> <p><b>3. Permitted with Consent</b></p> <p>Bed and breakfast accommodation; Building identification signs; Business identification signs; Centre-based child care facilities; Community facilities; Dual occupancies; Dwelling houses; Early education and care facilities; Educational establishments; Emergency services facilities; Environmental protection works; Exhibition homes; Exhibition villages; Flood mitigation works; Group homes; Health consulting rooms; Home businesses; Home industries; Hospitals; Hostels; Neighbourhood shops; Oyster aquaculture; Pond-based aquaculture; Public administration buildings; Recreation areas; Recreation facilities (indoor); Recreation facilities (outdoor); Respite day care centres; Roads; Seniors housing; Semi-detached dwellings; Tank-based aquaculture; Water recycling facilities</p> <p><b>4. Prohibited</b></p> <p>Any (other) development not specified in item 2 or 3 (above)</p>

Table 3 – Current Provisions under Cumberland LEP 2021

Clause 2.5 – Additional Permitted Uses for Particular Land	The site is not currently identified for any additional permitted uses in Schedule 1 or on the associated Additional Permitted Uses map.
Clause 4.1 – Minimum Subdivision Lot Size	A minimum lot size of <b>450m<sup>2</sup></b> applies to the site for land subdivision under Clause 4.1, as shown on the Lot Size Map. Clause 4.1 provides for a lot to be less than this for an approved dual occupancy.
Clause 4.3 – Height of Buildings	A maximum height of <b>9m</b> currently applies across the site under Clause 4.3, as shown on the Height of Buildings map.
Clause 5.10 – Heritage Conservation	The site is identified as a heritage item of local significance (Item no. I244, described as ' <i>The Wattles, Victorian/ Georgian residence</i> ') in Schedule 5 of the CLEP and shown on the associated Heritage map.

The most likely outcome for the development of site by a private owner with the current permitted uses available under the R2 Low Density Residential zoning would be residential subdivision and construction of multiple two-storey dwellings or attached dual occupancies.

While permissible and capable of being accommodated on the site, this outcome is not considered to be ideal to the specific circumstances of the site, with regard to the location surrounded by major road corridors and the outcome for the heritage building at the eastern end of the site.



## 3 The Planning Proposal

Section 3.33 of the Environmental Planning and Assessment Act 1979 (EP&A Act) outlines the required contents of a planning proposal. The NSW Department of Planning and Environment's *Local Environmental Plan Making Guideline* (September 2022) provides further guidance and separates the requirements into six components or parts. These parts are addressed in proceeding subsections of this report as follows:

- Part 1 – A statement of the objectives and intended outcomes of the proposed instrument (for changes to the Cumberland LEP 2021).
- Part 2 – An explanation of the provisions that are to be included in the proposed instrument (to change the Cumberland LEP 2021).
- Part 3 – The justification of strategic and site-specific merit for the proposed provisions (changes) and the process for their implementation including:
  - the suitable need for the planning proposal
  - the relationship and alignment to the strategic planning framework
  - consideration of environmental, social and economic impacts
  - adequacy of infrastructure
  - relevant State and Commonwealth interests.
- Part 4 – Maps (existing and with proposed changes) to identify the intent of the planning proposal and the area to which it applies.
- Part 5 – Community consultation details and government agency consultation to be undertaken on the planning proposal.
- Part 6 – Project timeline for the process.

### 3.1 Part 1- Objectives and intended outcomes

The Planning Proposal will enable the development of the subject site at 245 Great Western Highway, South Wentworthville for the purposes of a hotel/motel and enable the long-term conservation and use of 'The Wattles' heritage building on the site, for a restaurant or cafe. The proposal aims to achieve the following objectives and outcomes:

#### **Objectives:**

##### *The Wattles, 245 Great Western Highway, South Wentworthville*

1. To amend the Cumberland LEP 2021 to increase building heights, introduce a suitable FSR and permit additional uses to enable the development of the site for a multi-level hotel/motel with rooftop dining/bar and facilities on the western portion of the site, and the adaptive reuse of 'The Wattles' heritage house for a restaurant or cafe on the eastern portion of the site.
2. To introduce the changes to the planning provisions under the Cumberland LEP 2021 in such a way that enables the specific outcomes suitable to the particular site circumstances, surrounded on all sides by wide road corridors and

containing a heritage house, while providing reasonable certainty that there would not be unintended consequences.

### **Intended Outcomes:**

#### **The Wattles, 245 Great Western Highway, South Wentworthville**

- Enable the redevelopment of an underutilised site into hotel/motel accommodation that is more appropriate to the 'highway' location and relationship to 'The Wattles' heritage house on the site than residential subdivision and multiple two-storey dwelling houses under the R2 Low Density Residential zoning.
- Facilitate the delivery a high-quality multi-level hotel / motel building with rooftop dining and facilities in a form which responds to the site circumstances, maintaining a large garden setting around 'The Wattles' heritage house and having little visual or amenity impact on the surrounding area.
- Facilitate the restoration of 'The Wattles' heritage building and gardens and adaptive reuse for a restaurant, for the longer-term commercial viability of conserving the locally significant item.
- Contribute to the diversity of short-term accommodation within the Cumberland LGA in a location well serviced by public transport and road networks in close proximity to the Parramatta CBD and Westmead Health and Education Precinct.
- Contribute to the local economy by providing additional employment opportunities for the local community along a public transport corridor that supplements and compliments nearby existing centres.
- Provide a social destination for the local community that enables them to see and experience 'The Wattles' heritage item, contributing to the cultural richness of the area.
- Facilitate the suitable development of an accessible, high-exposure site that aligns with local and State strategic objectives for the Cumberland LGA and Greater Parramatta and Olympic Peninsula (GPOP) area in relation to:
  - aligning with and optimising access and movement transport infrastructure
  - creating places and spaces that enhance social life and celebrate local culture and history
  - providing jobs and business that support the local economy and compliment the role of centres and the GPOP area
  - enhancing the gardens and vegetation on the site for improvement to the area's great outdoors.

## 3.2 Part 2 - Explanation of Provisions

This planning proposal seeks to amend Cumberland LEP 2021 in relation to the height of building development standards and permitted land use provisions.

In order to achieve the desired objectives and intended outcomes for the site at 245 Great Western Highway, South Wentworthville, the following amendments to the Cumberland LEP 2021 are proposed:

1. Amend the Cumberland LEP 2021 **Height of Buildings Map** (Sheet HOB\_008) from 9 metres to a maximum building height of 27 metres on the western part of the site.
2. Amend the Cumberland LEP 2021 **Floor Space Ratio Map** (Sheet FSR\_008) to introduce an FSR control of 1:1 to the site.
3. Amend **Schedule 1 - Additional permitted uses** in the Cumberland LEP 2021 to add 'hotel or motel accommodation' and 'restaurant or cafe' as permitted uses for the site, by inserting the following clause at the end of the schedule:

*"Use of certain land at 245 Great Western Highway, South Wentworthville*

*(1) This clause applies to Lot 100, DP 878926, 245 Great Western Highway, Auburn, shown as "29" on the Additional Permitted Uses Map.*

*(2) Development for the purposes of hotel or motel accommodation and restaurant or cafe is permitted with development consent.*

*(3) Despite subclause (2), the development of hotel or motel accommodation must not exceed 76 hotel or motel rooms and a gross floor area of 3,040m<sup>2</sup>."*

### 3.2.1 Design Rationale

The proposed built form controls of 1:1 FSR and 27m maximum height of buildings reflects the concept design and is the result of heritage advice provided by Sue Rosen Associates and built form testing undertaken by the project designers, White Star and Mecone.

#### Design Principles

The concept design for the site layout and building envelopes has been developed in response to the design principles for the site:

- preference increased height rather than footprint given the substantially 'isolated' and separated nature of the site, with no established street pattern
- concentrate new building mass on the western portion of the site and provide generous separation to 'The Wattles' heritage cottage
- provide uninterrupted heritage gardens around 'The Wattles' heritage house, extending north to the property boundary to the M4 entry lane
- provide for pedestrian and vehicle driveway entry/exit around the western side of a new hotel/motel building.
- provide a short setback and street level ground floor to the hotel/motel to ensure the building relates to the wide verge and ground entry/facilities are visible from the road
- allow for high ground floor ceilings for a hotel building for sense of light, space and entry, as well as providing for services and ducting

- enable space for rooftop dining and terrace facilities that enable outlook to Parramatta CBD and surrounding district, on a separate level to hotel/motel rooms
- allow sufficient height for rooftop services and equipment including lift overruns, air-conditioning plant, water tanks and solar panels
- allow for a separate, joined 'restaurant facilities' building at the rear of the heritage item to provide for a commercial kitchen and bathroom facilities.

### Feasibility Testing

The proposed maximum FSR of 1:1 is based on built form feasibility testing of the concept design.

The hotel building envelope is formed by a combination of:

- 40m+ separation from The Wattles heritage cottage
- 6m setback to the western boundary
- 3m setback to the rear M4 corridor boundary (over 30m from M4 sound wall)
- 1m-11m setback to Great Western Hwy boundary (over 12m to road lanes)
- split 4 storey and 6 storey hotel/motel with rooftop facilities to reduce the impact on the heritage house and gardens.

The Wattles building envelope is formed by a combination of:

- the existing Wattles building
- any new structures on the eastern side of the site being single storey
- a 'restaurant' addition to 'The Wattles' being located at the rear and recessed at least 1.5m back from the sides
- 5m minimum rear setback to M4 corridor boundary.

The proposed GFA efficiency is within the normal range for commercial hotels of between 80% and 85%, similar to other commercial buildings which do not involve residential provision of balconies or amenity. This GFA efficiency is recognised in Section 2D of the ADG which states that "*Commercial and retail generally fill 80-85% of their envelope.*" It is also noted that the Gross Building Area represents the extent of building mass modelled in the concept design, and not the full extent of the Building Envelope Area within the setbacks above.

The findings of the concept design feasibility testing are that the combination of floor space ratio of 1:1 and a 'loose-fit' maximum building height of 27m on the western part of the site is suitable for the site given:

- visual context
- strategic context
- environmental impacts
- feasibility
- quality design
- heritage benefits.

### 3.3 Part 3 – Justification

#### 3.3.1 Section A – Need for the Proposal

##### **1. Is the Planning Proposal a result of an endorsed LSPS, strategic study or report?**

The planning proposal is a site-specific response to the particular circumstances of the site, surrounded on all sides by wide road corridors and containing a heritage item.

The planning proposal has arisen as a result of an analysis of alternative uses and massing for the site, which identified the opportunity to make:

- the revitalisation of a largely vacant and underutilised site feasible by means of a suitable visitor-based use and siting of built form mass that is compatible with the heritage building and context
- the restoration of the heritage house and gardens for adaptive reuse and commercially viable longer-term conservation.

The proposed amendment to the Cumberland LEP for increasing building height and permitting additional uses is not a specific action identified in the Cumberland Local Strategic Planning Statement (LSPS), nor a specific strategic study or report by Council.

The following strategic plans are relevant to the planning proposal:

- Greater Sydney Regional Plan 2036
- Central City District Plan 2036
- Cumberland Local Strategic Planning Statement.

The planning proposal for the site is generally consistent with the objectives of the Greater Sydney Region Plan and strategic directions of the Central City District Plan and aligns with the priorities of the Cumberland LSPS. The strategic merit of the proposal is discussed further in Section B – Relationship to the strategic planning framework.

The proposal represents a strategic opportunity and a significant opportunity for the public to benefit from the restoration of 'The Wattles' heritage building and uses that would allow public access to the grounds and the heritage item.

##### **Q2. Is the Planning Proposal the best means of achieving the objectives and outcomes, or is there a better way?**

The planning proposal is the best means of facilitating the identified objectives and intended outcomes for the specific circumstances of the site.

The current R2 zoning does not permit hotels or motels, nor 'restaurants or cafes'. The current height standard would not facilitate the concentration of building mass over multiple levels at the western side, necessary to facilitate viable hotel/motel development whilst also maintaining a large heritage garden setting around the item at the eastern end of the site.

Other options considered were:

Rezoning the site to a zone which permits the intended uses

An alternative to amending Schedule 1 of the Local Environmental Plan is to 'rezone' the site to a zone which permits the desired uses for this location. This would involve adopting one of the business zones which permits both hotel or motel accommodation and restaurant or cafe. The B2 Local Centre, B4 Mixed Use and B6 Enterprise Corridor zones permit these uses.

However, these zones also permit a wide range of other uses, several of which would be unsuitable to the location and heritage attributes of the site or have an undesirable impact on surrounding centres. Various forms of retail premises (with associated building formats and traffic generation) would be permitted including specialised (bulky goods) retail premises, vehicle sales or hire premises and neighbourhood shops. In the case of the B2 or B4 zone, intensified residential in the form of shop top housing would be permitted. In the case of a B6 zoning, light industries would be permitted. The site is not generally considered to be suitable for many uses associated with alternative zone options and the owner of the site does not wish to pursue these outcomes.

In the longer term the site and surrounding locality may be suitable for a business zoning, however this should be the result of a strategic study. The proposal would not preclude or be incompatible with such and the state of the heritage item and the opportunity to achieve a suitable use of the site in the immediate short term warrant a planning proposal proceeding.

In response to the particular circumstances of the site, involving location on all sides by major road corridors and the location of the heritage building at the eastern end of the site, retaining the existing zone and permitting specific suitable additional permitted uses to Schedule 1 of the Cumberland LEP was deemed most appropriate.

#### Submission to a Principal Cumberland LEP Planning Proposal

An alternate option would involve making a formal submission to a principal LEP planning proposal to bundle the proposed changes with the updating of the LEP. The comprehensive review and implementation of the Cumberland LEP 2021 has recently been finalised and implemented in November 2021. At the time that the applicant was taking ownership of the site, the process too far progressed, and Cumberland Council has taken approach of limiting the parameters of change to ensure the reasonably timely delivery of the new principal Environmental Planning Instrument for the amalgamated Cumberland Council and implementation of the Local Housing Strategy.

The next principal LEP review is likely to be five or more years away. The immediate consideration of the proposal for potential implementation by amendment to the Cumberland LEP is necessary to enable the opportunity for improved cultural and economic outcomes on the site to the benefit of the local community. Specifically, it will be beneficial to the outcomes for The Wattles heritage building and grounds which have been declining in recent years. The proposal to increase building height controls for greater design flexibility and introduce hotels or motels and restaurant or cafe as permissible uses would avoid sub-optimal outcomes on the site that would likely result under the current land use and building height provisions.

This site-specific planning proposal allows for the use and form of potential development on the site to be contemplated in detail, as well as strategically in terms of how it integrates with surrounding area and aligns with the planning priorities for Cumberland City and the GPOP area. The planning proposal is appropriate to the circumstances of the site.

Taking into consideration the above alternatives, the planning proposal is the most suitable means of achieving the objectives and intended outcomes for the site.

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

#### **Q3. Will the planning proposal give effect to the objectives and actions of the applicable regional, or district plan or strategy (including any exhibited draft plans or strategies)?**

The relevant directions, planning priorities and actions of the Greater Sydney Region Plan and Central City District have been considered in the preparation of the planning proposal. The relevant plans and strategies applicable to the subject site are addressed below.

##### **Greater Sydney Region Plan 2036**

In March 2018, the NSW Government released the *Greater Sydney Region Plan: A Metropolis of Three Cities* (the Region Plan) a 20-year plan which outlines a three-city vision for metropolitan Sydney for to the year 2036.

The Region Plan is structured under four themes: Infrastructure and Collaboration, Liveability, Productivity and Sustainability. Within these themes are 10 directions that each contain potential indicators and, generally, a suite of objectives supported by a Strategy or Strategies.

The planning proposal is generally consistent with the relevant strategic directions and objectives of the Region Plan, as shown in Table 3 below.

Few of the 15 specific actions in the Region Plan are considered directly relevant to the site or planning proposal. The proposal aligns and gives effect to relevant actions under Objectives 10 and 15 as follows:

- **Objective 10, Actions 3 and 4: Prepare housing strategies and develop 6–10 year housing targets**

Cumberland City Council's Local Housing Strategy was prepared and endorsed in 2020. The strategy proposes to accommodate most housing growth concentrated within 14 local and strategic centres at transport hubs. The strategy identifies that some limited infill growth would occur outside of these centre catchments. The site at 245 Great Western Highway, South Wentworthville does not fall within any of these centres and the site is not relied upon to necessarily meet housing targets and needs. The proposal does not change the potential of the site to accommodate multiple dwelling houses or dual occupancies.

- **Objective 15, Actions 6 and 7: Collaborate to deliver the Greater Parramatta and the Olympic Peninsula (GPOP) vision and develop a growth infrastructure compact for GPOP**

The site is located within the western area of the GPOP corridor. GPOP is envisaged to become the Central City's "connected and unifying heart". The vision is for it to be a place for new businesses, homes and services; for diverse employment; for walking and cycling; and to facilitate spaces for arts and culture. The proposal to enable a multi-level hotel and adaptive reuse of The Wattles heritage building on the site is consistent with this vision. The proposal will create potential for an estimated 40 additional local jobs, be a meeting and accommodation place for business and provide for public access to a culturally significant place.



Table 4 – Greater Sydney Region Plan

Direction	Relevant Objective	Comment
Infrastructure and Collaboration		
A city supported by infrastructure	<b>O1:</b> Infrastructure supports the three cities	The proposal allows for more intense activity and use of land within walking distance (<200m) of Coleman T-Way bus station. The site is strategically positioned adjacent to the Great Western Highway and M4 Motorway. A multi-level hotel and restaurant in this location will contribute to optimising the use of this transport infrastructure.
	<b>O2:</b> Infrastructure aligns with forecast growth – growth infrastructure compact	
	<b>O3:</b> Infrastructure adapts to meet future need	
	<b>O4:</b> Infrastructure use is optimised	
Livability		
A city for people	<b>O6:</b> Services and infrastructure meet communities' changing needs	The proposal would enable the development of a multi-level hotel and restaurant on the site, providing visitor accommodation and a gathering place at a place of local cultural significance, facilitating social interaction and community cultural life.
	<b>O7:</b> Communities are healthy, resilient and socially connected	
	<b>O8:</b> Greater Sydney's communities are culturally rich with diverse neighbourhoods	
	<b>O9:</b> Greater Sydney celebrates the arts and supports creative industries and innovation	
Housing the city	<b>O10:</b> Greater housing supply	The proposal does not change the potential of the site to accommodate multiple dwelling houses or dual occupancies.  Nevertheless, the site is not considered ideally suited to low density residential uses due to its position as an 'island' between several major road transport corridors, the associated noise amenity and the impact that multiple driveway crossings would have on the Great Western Highway function. Cumberland Local Housing Strategy confirms that sufficient capacity for diverse and affordable housing development is planned and available in more ideal locations.
	<b>O11:</b> Housing is more diverse and affordable	



Table 4 – Greater Sydney Region Plan

		Short-term visitor accommodation in the form of a multi-level hotel is proposed as a more appropriate outcome. This use and built form massing at the western end of the site would leverage the high exposure nature of the site, is less sensitive to amenity impacts and would have less direct impact on the road function. Hotel or motel accommodation and food and drink premises are considered the highest and best uses appropriate to the location and circumstances.
A city of great places	<b>O12:</b> Great places that bring people together	The proposal will enable the development of a hotel and restaurant, which will attract people to the site and facilitate social interaction and cultural enrichment.
	<b>O13:</b> Environmental heritage is identified, conserved and enhanced	<p>The proposal will enable the conservation and enhancement of 'The Wattles' heritage item located at the eastern end of the site.</p> <p>The Heritage Impact Statement by Sue Rosen Associated (provided in Appendix 3) concludes that the proposed land uses and built form, as shown in the concept design:</p> <ul style="list-style-type: none"> <li>• <i>is preferable to other options considered for the site, which variously involved subdivision and construction of multiple dwellings...</i></li> <li>• <i>has the potential to generate income to fund the ongoing conservation and maintenance of The Wattles and its setting...</i></li> <li>• <i>allows the site to be appreciated by a wider audience, and activates what could continue to be a 'forgotten' and otherwise inaccessible site...</i></li> <li>• <i>creates two distinct 'precincts' on the site... (and) The Wattles retains an appropriate curtilage that affords it dominance in its own reinstated garden setting...</i></li> <li>• <i>increases the ability of the concept hotel/motel to be a viable business...</i></li> </ul>

Table 4 – Greater Sydney Region Plan

Productivity		
A well connected city	<b>O14:</b> The plan integrates land use and transport creates walkable and 30 minute cities	<p>The site is located within the western area of the Greater Parramatta precinct of GPOP, in close proximity to the M4 Motorway, Great Western Highway. The site is located within a short 2 minute walk to the Parramatta to Liverpool Bus T-way, with high frequency buses connecting to the nearby Parramatta CBD within 10 minutes.</p> <p>The proposal to expand permitted uses and increase building height to accommodate a multi-level hotel and use of the heritage building as a restaurant supports the 'walkable 30 minute cities' goal, integrating land use intensification with transport to Parramatta CBD. The proposal represents a modest intensification of activity in a suitable location that will contribute to a stronger greater Parramatta.</p>
	<b>O15:</b> The Eastern, GPOP and Western Economic Corridors are better connected and more competitive	<p>The proposal will facilitate a multi-level hotel within close proximity to the Parramatta CBD and Westmead Health and Innovation District, supporting GPOP corridor by contributing to the range of visitor accommodation options and facilitating a local cultural dining experience. While modest, the proposal would enhance the potential offering of the corridor.</p>
Jobs and skills for the city	<b>O19:</b> Greater Parramatta is stronger and better connected	<p>The proposal will enable a multi-level hotel that would support the growth of Greater Parramatta, providing an alternate short term accommodation option for visitors and tourists. The site is located in close proximity to the frequent T-way bus services connecting to Parramatta CBD.</p>
	<b>O21:</b> Internationally competitive health, education, research and innovation precincts	<p>The proposal will enable a multi-level hotel that would support the growth of nearby Westmead Health and Innovation District, providing short term visitor accommodation options for patients, hospital and research staff.</p>

Table 4 – Greater Sydney Region Plan

	<b>O22:</b> Investment and business activity in centres	The proposal will enable a multi-level hotel that would create an estimated 40 additional local jobs and support the Parramatta CBD and Westmead Health and Innovation District.
	<b>O23:</b> Industrial and urban services land is planned, retained and managed	The proposal for the site does not involve rezoning industrial or urban services land.
	<b>O24:</b> Economic sectors are targeted for success	The proposal will enable a multi-level hotel that would support targeted industry programs in Westmead and Parramatta.
<b>Sustainability</b>		
A city in its landscape	<b>O25:</b> The coast and waterways are protected and healthier	The proposal will enable redevelopment of the site in a form that would involve the reinstatement of the heritage gardens around The Wattles heritage house, as well as landscaping and planting of trees for significant improvement to the current vacant grassland state. The site is not located on or near any waterway.
	<b>O27:</b> Biodiversity is protected, urban bushland and remnant vegetation is enhanced	
	<b>O28:</b> Scenic and cultural landscapes are protected	The Wattles heritage item is not highly distinguishable from either the Great Western Highway or M4 Motorway. Nevertheless, the proposed concept design provides over 40m separation between the hotel building and the heritage building, maintaining visual setting around the item and the minimal sightlines.
	<b>O30:</b> Urban tree canopy cover is increased	The proposal will facilitate viable redevelopment of the site, involve the reinstatement of the garden setting and planting of trees on and around the site, contributing to increased canopy.

### Central City District Plan

In March 2018, the NSW Government released *Central City District Plan* which outlines a 20 year plan for the Central City District which comprises The Hills, Blacktown, Cumberland and Parramatta local government areas.

Taking its lead from the GSRP, the *Central City District Plan* (the District Plan) is also structured under four themes relating to Infrastructure and Collaboration, Liveability,

Productivity and Sustainability. Within these themes are Planning Priorities that are each supported by corresponding Actions. The alignment of the planning proposal to relevant Planning Priorities is discussed in Table 4 below.

There are 10 District Plan actions considered to be of particular relevance to the planning proposal for the site at 245 Great Western Highway, South Wentworthville. The proposal aligns with and gives effect to these actions as follows:

- ***Action 6: Maximise the utility of existing infrastructure assets and consider strategies to influence behaviour changes, to reduce the demand for new infrastructure, including supporting the development of adaptive and flexible regulations to allow decentralised utilities.***

The proposal allows for more intense activity and use of land within walking distance (<200m) of Coleman T-Way bus station. The site is strategically positioned adjacent to the Great Western Highway and M4 Motorway. A multi-level hotel and restaurant in this location will contribute to optimising the use of this transport infrastructure.

- ***Action 8: Deliver social infrastructure that reflects the needs of the community now and in the future.***

The proposal does not involve an increase in population that would increase demand for social infrastructure. However, the proposal presents a significant opportunity for the public to benefit from the restoration of The Wattles heritage building and uses that would allow public access to the grounds and the heritage item. The proposal will facilitate the delivery of visitor accommodation and a social destination in a culturally significant heritage building.

- ***Action 10: Deliver healthy, safe and inclusive places for people of all ages and abilities that support active, resilient and socially connected communities by:***
  - a. providing walkable places at a human scale with active street life***
  - b. prioritising opportunities for people to walk, cycle and use public transport***
  - c. co-locating schools, health, aged care, sporting and cultural facilities***
  - d. promoting local access to healthy fresh food and supporting local fresh food production.***

The site is positioned on major road transport corridors providing immediate vehicle access. However, it is ideally located within a short walk of the Coleman T-Way bus station which receives bus services to Parramatta CBD. It is intended that the Great Western Highway road verge would be upgraded as part of a future development and a new wide footpath provided along the front of the site connecting with the T-way stations to the east. The proposal makes redevelopment viable which would facilitate the improvements and create a more walkable, attractive street environment.

The proposal will enable food and drink premises in the form of a restaurant and dining facilities at the hotel. Food premises in such settings would likely provide fresh food options which would be available to the local community.

- ***Action 15: Strengthen social connections within and between communities through better understanding of the nature of social networks and supporting infrastructure in local places.***

The proposal will enable the development of a hotel and restaurant, which will attract people to the site and facilitate social interaction and cultural enrichment.

- **Action 18 (shown 1): Using a place-based and collaborative approach throughout planning, design, development and management, deliver great places by:**
  - a. prioritising a people-friendly public realm and open spaces as a central organising design principle**
  - b. recognising and balancing the dual function of streets as places for people and movement**
  - c. providing fine grain urban form, diverse land use mix, high amenity and walkability, in and within a 10-minute walk of centres**
  - d. integrating social infrastructure to support social connections and provide a community hub**
  - e. recognising and celebrating the character of a place and its people.**

As discussed above, while the site is positioned on major road transport corridors, it is also ideally located within a short walk of the Coleman T-Way bus station. It is intended that the Great Western Highway road verge would be upgraded as part of a future development and a new wide footpath provided along the front of the site connecting with the T-way stations to the east.

- **Action 19 (shown 2): Identify, conserve and enhance environmental heritage by:**
  - a. engaging with the community early in the planning process to understand heritage values and how they contribute to the significance of the place**
  - b. applying adaptive re-use and interpreting of heritage to foster distinctive local places**
  - c. managing and monitoring the cumulative impact of development on the heritage values and character of places.**

The proposal will enable the conservation and enhancement of 'The Wattles' heritage item located at the eastern end of the site. The proposal will support the adaptive re-use of the on-site heritage item 'The Wattles', opening it up to the community and public after decades of use as a private residential dwelling. The proposed hotel use will be setback at least 40m from the item, protecting its curtilage and minimising potential visual and heritage impacts.

- **Action 23: Strengthen the economic competitiveness of Greater Parramatta and grow its vibrancy by:**
  - a. enabling the development of an internationally competitive health and education precinct at Westmead**
  - b. creating opportunities for an expanded office market**
  - c. balancing residential development with the needs of commercial development including, if required, a commercial core**
  - d. providing for a wide range of cultural, entertainment, arts and leisure activities**
  - e. improving the quality of Parramatta Park and Parramatta River and their walking and cycling connections to Westmead and Parramatta CBD**
  - f. providing for a diverse and vibrant night-time economy, in a way that responds to potential negative impacts.**

The proposal will facilitate a multi-level hotel within close proximity to the Parramatta CBD and Westmead Health and Innovation District, supporting GPOP corridor by contributing to the range of visitor accommodation options and facilitating a local cultural dining experience. While modest, the proposal would enhance the potential offering of the corridor and contribute to a stronger greater Parramatta.

- **Action 32: Integrate land use and transport plans to deliver the 30-minute city.**

The proposal to expand permitted uses and increase building height to accommodate a multi-level hotel and use of the heritage building as a restaurant supports the 'walkable 30 minute cities' goal, integrating land use intensification with transport to Parramatta CBD. The proposal represents a modest intensification of activity in a suitable location that will contribute to a stronger greater Parramatta.

- **Action 57: Consider opportunities to implement place-based initiatives to attract more visitors, improve visitor experiences and ensure connections to transport at key tourist attractions**

The proposed additional uses for hotel and motel accommodation and restaurant or cafe are place specific initiatives to enable the redevelopment of the site into an attractive place for visitors. It is intended that the Great Western Highway road verge would be upgraded as part of a future development improving the experience in this location and connection to the T-way stations to the east.

- **Action 58: Consider opportunities to enhance the tourist and visitor economy in the District, including a coordinated approach to tourism activities, events and accommodation.**

Currently, tourist and visitor accommodation is largely limited to the B2 Local Centre and B4 Mixed Use zoned centres where opportunities are limited. Within the GPOP corridor it is important to provide for a range of accommodation venues and travel options for visitors. The site presents a unique opportunity to provide multi-level hotel accommodation in a location that is both highly accessible by major roads and also highly convenient to frequent intermediate public transport into Parramatta CBD. The location is highly appropriate to this use and suitable for the multi-level built form proposed within the increased height.

- **Action 59: When preparing plans for tourism and visitation, consider:**
  - a. encouraging the development of a range of well-designed and located facilities**
  - b. enhancing the amenity, vibrancy and safety of centres and township precincts**
  - c. supporting the development of places for artistic and cultural activities**
  - d. improving public facilities and access**
  - e. protecting heritage and biodiversity to enhance cultural and eco-tourism**
  - f. supporting appropriate growth of the night-time economy**
  - g. developing industry skills critical to growing the visitor economy**

Consistent with the approach in this action, the proposal enables restaurant or cafe in addition to the hotel or model accommodation use. The concept design envisions hotel facilities, conference room and rooftop dining, in addition to the restaurant within The Wattles heritage building. It is intended that enhanced gardens and

upgrade works along the road verge would improve access, amenity and vibrancy in this location.

Table 5 – Central City District Plan		
Direction	Planning Priorities	Comment
<b>Infrastructure and Collaboration</b>		
A city supported by infrastructure	<b>C1:</b> Planning for a city supported by infrastructure	<p>The proposal, involving a modest intensification of activity by introduction of additional land uses and increased building height, is supported by existing transport infrastructure and services in this location.</p> <p>The proposal allows for more intense activity and use of land within walking distance (&lt;200m) of Coleman T-Way bus station. The site is strategically positioned adjacent to the Great Western Highway and M4 Motorway. A multi-level hotel and restaurant in this location will contribute to optimising the use of this transport infrastructure.</p>
	<b>C2:</b> Working through collaboration	
<b>Liveability</b>		
A city for people	<b>C3:</b> Provide services and social infrastructure to meet people's changing needs	<p>The proposal would enable the development of a multi-level hotel and restaurant on the site, providing visitor accommodation and a gathering place at a place of local cultural significance, facilitating social interaction and community cultural life.</p> <p>The proposal does not increase the residential capacity of the site, and so would not increase demand for local social infrastructure.</p>
	<b>C4:</b> Working through collaboration	

Table 5 – Central City District Plan

Housing the city	<b>C5:</b> Providing housing supply, choice and affordability, with access to jobs, services and public transport	<p>The proposal does not change the potential of the site to accommodate multiple dwelling houses or dual occupancies.</p> <p>Nevertheless, the site is not considered ideally suited to low density residential uses due to its position as an 'island' between several major road transport corridors, the associated noise amenity and the impact that multiple driveway crossings would have on the Great Western Highway function. Cumberland Local Housing Strategy confirms that sufficient capacity for diverse and affordable housing development is planned and available in more ideal locations.</p> <p>Short-term visitor accommodation in the form of a multi-level hotel is proposed as a more appropriate outcome. This use and built form massing at the western end of the site would leverage the high exposure nature of the site, is less sensitive to amenity impacts and would have less direct impact on the road function. Hotel or motel accommodation and food and drink premises are considered the highest and best uses appropriate to the location and circumstances.</p>
A city of great places	<b>C6:</b> Creating and renewing great places and local centres, and respecting the District's heritage	The proposal will enable the development of a hotel and restaurant, which will attract people to the site and facilitate social interaction and cultural enrichment.
	<b>O13:</b> Environmental heritage is identified, conserved and enhanced	<p>The proposal will enable the conservation and enhancement of 'The Wattles' heritage item located at the eastern end of the site.</p> <p>The Heritage Impact Statement by Sue Rosen Associated (provided in Appendix 3) concludes that the proposed land uses and built form, as shown in the concept design:</p> <ul style="list-style-type: none"> <li>• <i>is preferable to other options considered for the site, which variously involved subdivision and construction of multiple dwellings...</i></li> </ul>



Table 5 – Central City District Plan

		<ul style="list-style-type: none"> <li>• has the potential to generate income to fund the ongoing conservation and maintenance of The Wattles and its setting...</li> <li>• allows the site to be appreciated by a wider audience, and activates what could continue to be a 'forgotten' and otherwise inaccessible site...</li> <li>• creates two distinct 'precincts' on the site... (and) The Wattles retains an appropriate curtilage that affords it dominance in its own reinstated garden setting...</li> <li>• increases the ability of the concept hotel/motel to be a viable business...</li> </ul>
<b>Productivity</b>		
A well connected city	<b>C7:</b> Growing a stronger and more competitive greater Parramatta	<p>The site is located within the western area of the Greater Parramatta precinct of GOP, in close proximity to the M4 Motorway, Great Western Highway. The site is located within a short 2 minute walk to the Parramatta to Liverpool Bus T-way, with high frequency buses connecting to the nearby Parramatta CBD within 10 minutes.</p> <p>The proposal to expand permitted uses and increase building height to accommodate a multi-level hotel and use of the heritage building as a restaurant supports the 'walkable 30 minute cities' goal, integrating land use intensification with transport to Parramatta CBD. The proposal represents a modest intensification of activity in a suitable location that will contribute to a stronger greater Parramatta.</p>
Jobs and skills for the city	<b>C7:</b> Delivering a more connected and competitive GOP Economic Corridor	<p>The proposal will facilitate a multi-level hotel within close proximity to the Parramatta CBD and Westmead Health and Innovation District, supporting GOP corridor by contributing to the range of visitor accommodation options and facilitating a local cultural dining experience. While modest,</p>

Table 5 – Central City District Plan

		the proposal would enhance the potential offering of the corridor.
	<b>C8:</b> Internationally competitive health, education, research and innovation precincts	The proposal will enable a multi-level hotel that would support the growth of nearby Westmead Health and Innovation District, providing short term visitor accommodation options for patients, hospital and research staff.
	<b>C9:</b> Delivering a more connected and competitive GPOP Economic Corridor	The proposal will enable a multi-level hotel that would create an estimated 40 additional local jobs and support the Parramatta CBD and Westmead Health and Innovation District.
	<b>C10:</b> Growing investment, business opportunities and jobs in strategic centres	The proposal for the site does not involve rezoning industrial or urban services land.
	<b>C11:</b> Maximising opportunities to attract advanced manufacturing and innovation in industrial and urban services land.	The hotel will support targeted industry programs in Westmead and Parramatta.
	<b>C12:</b> Supporting growth of targeted industry sectors	The proposal will enable a multi-level hotel that would support targeted industry programs in Westmead and Parramatta.
<b>Sustainability</b>		
	<b>C15:</b> Protecting and enhancing bushland, biodiversity and scenic and cultural landscapes	<p>The proposal will enable redevelopment of the site in a form that would involve the reinstatement of the heritage gardens around The Wattles heritage house, as well as landscaping and planting of trees for significant improvement to the current vacant grassland state.</p> <p>The Wattles heritage item is not highly distinguishable from either the Great Western Highway or M4 Motorway. Nevertheless, the proposed concept design provides over 40m separation between the hotel building and the heritage building, maintaining visual setting around the item and the minimal sightlines.</p>

Table 5 – Central City District Plan

	<b>C16:</b> Increasing urban tree canopy cover and delivering Green grid connections	The proposal will facilitate viable redevelopment of the site, involve the reinstatement of the garden setting and planting of trees on and around the site, contributing to increased canopy.
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**Q4. Is the planning proposal consistent with a council Local Strategic Planning Statement (LSPS) that has been endorsed by the Planning Secretary or GSC, or another endorsed local strategy or strategic plan?**

The relationship between the planning proposal and applicable local plans and strategies has been considered in relation to whether the planning proposal has strategic merit.

**Cumberland 2030: Our Local Strategic Planning Statement**

The Cumberland 2030 Local Strategic Plan (LSPS) provides for a land use vision that will guide the future growth and development across the Region to 2036 and beyond.

The table below demonstrates that the proposal aligns many of the planning priorities and actions identified within the LSPS.

Table 6 – Cumberland LSPS

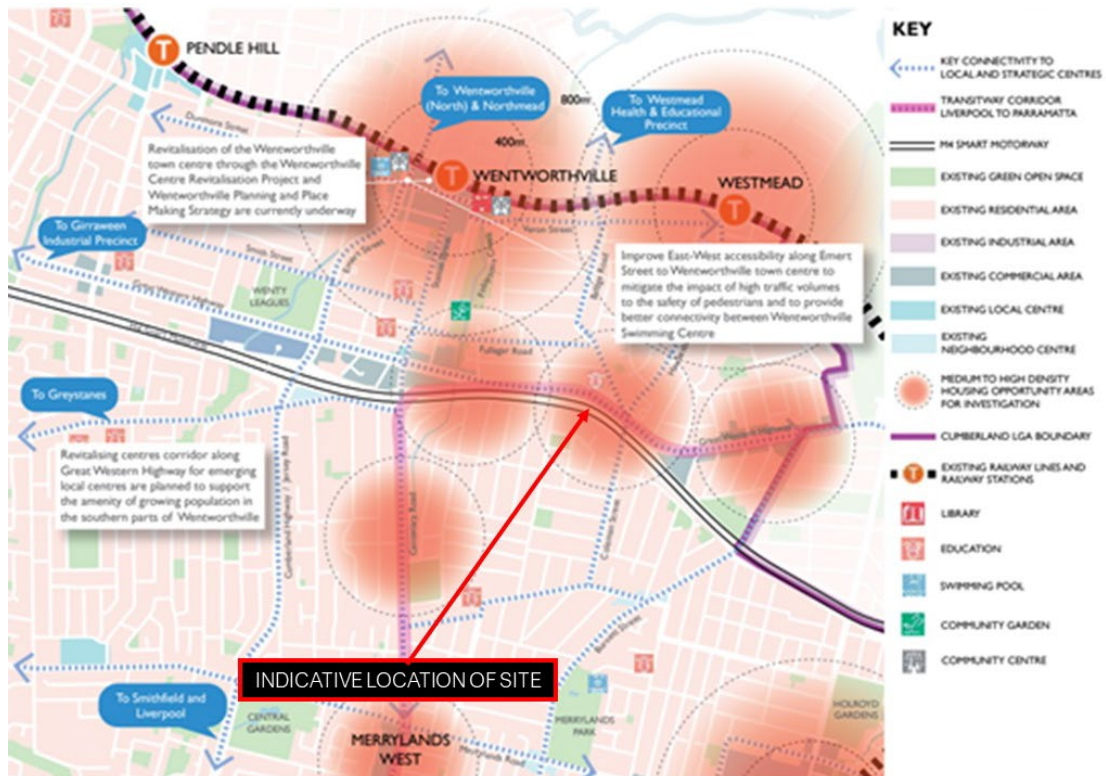
Action	Response of the Planning Proposal
<b>Vision: 'Cumberland is a diverse and inclusive community, offering easy access to jobs and services, with places and spaces close to home that take advantage of our natural, built and cultural heritage.'</b>	
<p>Response: The proposal will give effect to the vision of the LSPS as it leverages the unique opportunity provided by the local heritage item 'The Wattles' and main road transport corridor location. The redevelopment of the site will enable the adaptive reuse of the item for a restaurant, opening it up to the community after decades of use as a private residence. The proposal would enable the development of a multi-level hotel and restaurant on the site, providing visitor accommodation and a gathering place at a place of local cultural significance, facilitating social interaction and community cultural life.</p> <p>The proposal will enable a multi-level hotel and restaurant that would create an estimated 40 additional local jobs. Further, the development will create local construction and operational jobs, increasing the variety and number of jobs in the LGA.</p>	
<b>Place and spaces for everyone – Housing and Community</b>	
Planning Priority 8: Celebrating our natural, built and cultural diversity	The proposal will support the adaptive re-use of the on-site heritage item 'The Wattles', opening it up to the community and public after decades of use as a private residential dwelling. The proposed hotel use will be setback at least 40m from the item, protecting its curtilage and minimising potential visual and heritage impacts.
Planning Priority 9: Providing high quality, fit-for-purpose	The proposal will enable the development of a hotel and restaurant, providing a local destination available

Table 6 – Cumberland LSPS

community and social infrastructure in line with growth and changing requirements	to the community for social purposes and gatherings. The proposal will attract people to the site and facilitate social interaction and cultural enrichment.
<b>Economy, employment and centres</b>	
Planning Priority 10: Supporting a strong and diverse local economy across town centres and employment hubs	<p>The proposal will support the local economy through the provision of construction and hospitality jobs, with further economic stimulus generated by tourists and hotel guests.</p> <p>The proposed multi-level hotel use will support visitors to the Cumberland City LGA, including attractions such as Wentworthville Leagues Club, Westmead Health and Education Precinct and Merrylands Centre. The proposal will also support the Parramatta CBD and Westmead Health and Innovation District, by contributing to the range of visitor accommodation options and facilitating a local cultural dining experience.</p> <p>No large scale retail or other commercial uses are proposed and no adverse impacts expected on the viability of adjoining retail-based local centres, including South Wentworthville, are expected.</p>
Planning Priority 11: Promoting access to local jobs, education opportunities and care services	The proposal will generate a number of construction and hospitality jobs, contributing to the range and number of jobs on offer in the Cumberland City LGA.

## Land Use Intensification

Section 3 "Strategic Land use framework" of the Cumberland LSPS provides structure plans for the principle local centres within the LGA. The site is identified for 'medium to high density housing opportunity areas for investigation', due to its location adjacent to the Colman T-Way station. An extract of the masterplan is shown below.



**Figure 8.** Location of the site within the Wentworthville Centre Masterplan.

Source: CLSPS

As previously discussed, the site is not considered ideal for low density residential uses due to its nature as an 'island' between several road transport corridors and the associated acoustic, air quality and amenity impacts.

Short-term visitor accommodation is a more appropriate outcome as the use can leverage the high exposure nature of the site to attract visitors and is not as susceptible to the previously listed constraints. It is considered the highest and best use for the site. The proposal will facilitate an intensification of the previously approved hotel use on the site, consistent with land use uplift of the locality envisioned by the LSPS.

### Cumberland Council Community Strategic Plan 2017-2027

The Cumberland Community Strategic Plan sets out 6 strategic directions for the Cumberland LGA over the next 10 years. The proposal is considered to be in alignment with these key themes as demonstrated below:

- *A great place to live* – The proposal will contribute to the diverse range of experiences and opportunities available in Cumberland, improving the general livability of the LGA.

- *A safe and accessible community* – The proposal will enable the development of a long vacant site and provide for overlooking opportunities of the surrounding public domain, increasing the safety of the area.
- *A clean and green community* – The proposal will enable the development of a long vacant site, improving its presentation to the streetscape and instilling community pride.
- *A strong local community* – The proposal will create local jobs, open the Wattles heritage item to the community and provide a meeting place for all residents.
- *A resilient built environment* – The site is located in a strategic location within the LGA, well serviced by public transport and appropriate to accommodate the proposed density.
- *Transparent and accountable leadership* – The proposal will not be inconsistent with this strategic direction.

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

The Planning Proposal would address and/or be consistent with all relevant State Environmental Planning Policies (SEPPs). Consideration of relevant SEPPs is provided below in the table.

Table 7 – State Environmental Planning Policies		
SEPP	Consistency	Comments
SEPP (Biodiversity and Conservation) SEPP 2021	Consistent.	The Planning Proposal does not inhibit the application of the Biodiversity and Conservation SEPP. The proposal will not require the removal of vegetation, nor is it located in an environmentally sensitive area.
SEPP (Exempt and Complying Development Codes 2008	Consistent.	This SEPP provides State-wide development controls and standards for 'exempt' and 'complying' development. This Planning Proposal does not inhibit the application of Exempt and Complying Development Codes SEPP.
SEPP (Resilience and Hazards) SEPP 2021	Consistent.	A preliminary site investigation was undertaken by Douglas Partners in 2019 which provides sufficient information to enable an assessment of contamination potential. A detailed Phase 2 Environmental site Assessment will be undertaken prior to any future development.

Table 7 – State Environmental Planning Policies

SEPP	Consistency	Comments
SEPP (Housing) 2021	Consistent.	This SEPP provides for development pathways and incentives to provide for diverse forms of housing, including affordable rental housing and seniors housing. The Planning Proposal does not inhibit the application of the Housing SEPP.
SEPP (Design and Place) 2021	No applicable.	This SEPP provides design principles and guidance for residential flat buildings which are not permitted in the R2 Low Density Residential zone and are not proposed for the site. The Planning Proposal does not inhibit the application of the Design and Place SEPP.
SEPP (Industry and Employment) 2021	Consistent.	This SEPP provides a State-wide framework for the assessment and consideration of advertising and signage proposals. The Planning Proposal does not inhibit the application of the Industry and Employment SEPP.
SEPP (Primary Production) 2021	Not Applicable.	
SEPP (Housing) 2021	Consistent.	This SEPP provides for development pathways and incentives to provide for diverse forms of housing, including affordable rental housing and seniors housing. The Planning Proposal does not inhibit the application of Housing SEPP.
SEPP (Transport and Infrastructure) 2021	Consistent.	<p>This SEPP identifies development for which State agency consultation or concurrence must be required, and also provides for development which can be undertaken by infrastructure agencies without development consent. This Planning Proposal does not inhibit the application of the Transport and Infrastructure SEPP.</p> <p>Access will be provided to the Great Western Highway. A Traffic Study has</p>

Table 7 – State Environmental Planning Policies

SEPP	Consistency	Comments
		been prepared by Stantec to support the Proposal, confirming that no adverse impacts to the function, safety and efficiency of the GWH is expected as a result of the development.
SEPP (Resources and Energy) 2021	Not Applicable.	
SEPP (Planning Systems) 2021	Not Applicable.	
SEPP (Precincts – Eastern Harbour City) 2021	Not Applicable.	
SEPP (Precincts – Central River City) 2021	Consistent.	<p>The SEPP provides specific controls for identified state significant precincts, growth centres, urban renewal precincts and master planned sites.</p> <p>The site is not located in a nominated precinct and does not inhibit the application of the SEPP.</p>
SEPP (Precincts – Western Parkland City) 2021	Not Applicable.	
SEPP (Precincts – Regional) 2021	Not Applicable.	

Based on the above, it is considered that the planning proposal is consistent with relevant State Environmental Planning Policies, where applicable.



**Q6. Is the planning proposal consistent with applicable Ministerial Directions under 9.1 of the Act (previously referred to as s117 directions)?**

The Planning Proposal is consistent with all relevant 9.1 Directions. The assessment of these is outlined in the table below.

Table 8 – Section 9.1 Ministerial Directions			
Clause	Direction	Consistent	Comments
1. Planning Systems			
1.1	Implementation of Regional Plans	Consistent.	Consistency with Greater Sydney Region Plan - A Metropolis of Three Cities is demonstrated in Section 3.3 of this report.
1.4	Approval and Referral Requirements	Consistent.	The proposal does not include consultation, referral or concurrence provisions, nor clarifies any development as designated development.
1.5	Site Specific Provisions	Consistent.	The Planning Proposal does not propose any unnecessarily restrictive site-specific planning controls, and will use standard built form controls to amend the Cumberland LEP 2021.
3. Biodiversity and Conservation			
3.2	Heritage Conservation	Consistent.	<p>A Heritage Impact Statement has been prepared by Sue Rosen Associated and is provided under separate cover. The Statement confirms that the proposal has been sympathetically designed to maintain the heritage significance of 'The Wattles' and will not adversely impact upon the item.</p> <p>The proposed hotel is to be setback over 40m from the heritage item, the same location that a previous hotel was approved on the site under DA2010/93/1.</p>
4. Resilience and Hazards			
4.3	Planning for Bushfire Protection	N/A	The site is not bushfire prone.
4.5	Acid Sulfate Soils	Consistent.	A Preliminary Site Investigation has been undertaken (EI Australia, 2019) and considers the risk of acid sulfate soils present on site to be low.
5. Transport and Infrastructure			
5.1	Integrating Land Use and Transport	Consistent.	The proposal will enhance access to jobs, and services through connections to existing walking paths and bus services. The increased intensity will

Table 8 – Section 9.1 Ministerial Directions

Clause	Direction	Consistent	Comments
			strengthen the viability of existing public transport services in the area.
5.2	Reserving Land for Public Purposes	Consistent.	The proposal does not contain any land that has been reserved for a public purpose and no requests have been made to reserve such land.
6. Housing			
6.1	Residential Zones	Consistent.	<p>The site is not considered suitable to residential uses due to its nature as an 'island' between several road transport corridors and the associated acoustic, pollution and amenity impacts.</p> <p>Short-term accommodation (hotel) is therefore considered a more appropriate outcome as it can leverage the high exposure nature of the site and is not as susceptible to the previously listed constraints. It is considered the highest and best use for the site.</p> <p>Housing diversity and choice within the locality is not expected to be compromised by the development of the site for non-residential uses. Over the past decade dozens of apartment buildings have been constructed in the Great Western highway in Mays Hill and South Wentworthville, providing alternate housing opportunities in the traditionally suburban area.</p>

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

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

The entire site largely consists cleared grasslands with no notable native vegetation. Exotic vegetation exists surrounding the heritage item and along the M4 Motorway on-ramp to the north-east boundary of the site.

The site is not identified as containing biodiversity values.

Large eucalyptus trees exist to the south of the site entirely within the M4 corridor. No further ecological investigations are considered necessary. Further investigations are expected to be limited to an arboricultural investigation at the DA phase to ensure the adjoining trees can be protected as the site is developed.

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

**Built Form and Massing**

The proposed land use controls will provide for the desired development typology sensibly located in response to the various site constraints and opportunities.

The hotel will be setback over 40m from the on-site heritage item, as was the previous hotel approved through a rigorous assessment process under DA2010/93/1. The hotel will rise to 4 storeys and 6 storeys and will occupy the western handle portion of the site, maintaining a large curtilage of the heritage item and minimising visual impacts.

The proposal takes advantage of the site's 'island' nature within various transport corridors, which provide substantial separation distances between adjoining land uses. The hotel will be setback over 50m from low density dwelling located opposite the Great Western Highway, largely mitigating potential bulk, visual, privacy and overlooking impacts on the existing dwellings. Further, the site is located on the southern side of the Great Western Highway, ensuring any overshadowing impacts will be limited to the adjoining M4 Motorway corridor and not any residential dwellings.

The hotel will present a street wall not uncommon to the Great Western Highway, as similar 6 storey residential apartment buildings frame the corridor in both Mays Hill and Wentworthville. The proposal is ultimately considered to be an improvement to the current state of the site, which has long been vacant and undeveloped.

**Traffic**

A Traffic Impact Assessment (TIA) has been prepared by Stantec Australia (**Appendix 2**) to review the proposed access arrangements and determine the impacts of the proposal on the surrounding road network. The TIA addresses existing and proposed traffic generation, trip distribution, intersection performance and public transport.

**Parking**

On the basis that hotel visitors are expected to make up a significant proportional use of the café/restaurant demand, Stantec recommend that a 75% discount be applied to the café/restaurant parking demands. A parking requirement of 87 spaces has been determined by Stantec accordingly. Stantec conclude that the parking requirements can be accommodated on site subject to further to detailed assessment to be included as part of any future development application. Notwithstanding, the car parking provision on future development applications will take into consideration the car parking rates in Cumberland DCP 2021.

**Access and circulation**

There is an existing driveway crossing to the Great Western Highway approximately 25 metres west of the M4 on-ramp traffic signals. The original proposal was to utilise the existing driveway crossing for vehicles entering the site, with a western driveway for all exit movements.

Stantec confirm that both driveways allow the necessary sightlines, ensuring safe and appropriate site access given the posted speed limit and absence of

conflicting movements through the area. All vehicles would enter and exit the site in a forward direction. Stantec do not envision the proposal to affect the function, safety and efficiency of the Greater Western Highway to be compromised.

However, a revised concept plan for Scheme 4 was prepared that relocated the site access/exit points to the western part of the site. Scheme 4 provides for vehicular access and movement, circulation, turning, car parking and access for waste and delivery vehicles.

#### Existing and proposed trip generation

Traffic generation from the proposal has been assessed by Stantec. The TIA identified that the proposal would generate the following vehicular trips in the evening peak.

Table 9 – Evening peak hour traffic generation estimates			
Land Use	Size	Traffic Generation Rate	Traffic Generation
Hotel/motel	76 rooms	0.4 vehicle trips per room	30
Café/restaurant	203sqm GFA	5 vehicle trips per 100sqm GFA	10
<b>Total</b>			<b>40 trips</b>

Stantec note that all site generated traffic would approach from the east and depart to the west along the Great Western Highway. Given the low traffic volumes generated by the proposal (representing about two per cent of the westbound evening peak hour traffic volumes, this additional traffic is not expected to noticeably change the safety or function of the surrounding road network.

#### Contamination

The site has been continuously used for residential purposes and not known to have been used for a contaminating activity. The site was not identified as having potential for contamination in the previous development application (DA2010/93/1) for a motel. Further, the planning proposal does not involve a change of zoning or introduction of a more 'sensitive' use that would warrant further investigation at this stage under the SEPP 55 guidelines.

Notwithstanding, a Preliminary Site Investigation has been undertaken by Douglas Partners to support the Planning Proposal, which is provide as Appendix 4. The PSI concluded that the site can be made suitable for the proposed hotel/motel development, subject to the findings of the recommended investigations and surveys, and the implementation of any remediation actions (if required). It should be noted that a Detailed Site Investigation (DSI) will be required to investigate Potential Areas of Environmental Concern (PAECs), however this can be undertaken at the development application stage.

#### European Heritage

A Heritage Impact Statement has been by Sue Rosen Associated (provided in **Appendix 3**) which supports the proposed additional permitted uses and increased building height as shown in the concept design.

The proposal will enable the conservation and enhancement of 'The Wattles' heritage item located at the eastern end of the site. It will facilitate the restoration of 'The Wattles' heritage building and gardens and adaptive reuse for a restaurant, for the longer-term commercial viability of conserving the locally significant item.

The Heritage Impact Statement concludes that the proposed land uses and built form, as shown in the concept design:

- *is preferable to other options considered for the site, which variously involved subdivision and construction of multiple dwellings...*
- *has the potential to generate income to fund the ongoing conservation and maintenance of The Wattles and its setting...*
- *allows the site to be appreciated by a wider audience, and activates what could continue to be a 'forgotten' and otherwise inaccessible site...*
- *creates two distinct 'precincts' on the site... (and) The Wattles retains an appropriate curtilage that affords it dominance in its own reinstated garden setting...*
- *increases the ability of the concept hotel/motel to be a viable business...*

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

**Economic**

The proposed project is complementary to surrounding centres including Wentworthville, Merrylands and Parramatta, as well as the Westmead Health and Education Precinct. The hotel use will support the continued growth of these industries, furthering job creation and available services in the region.

The development has potential to deliver 40 direct jobs and an investment of approximately \$15 million. No substantial retail uses are proposed, with the development unlikely to affect the viability of adjacent local centres, particularly South Wentworthville.

3.3.4 Section D – State and Commonwealth Interests

**Q10. Is there adequate public infrastructure for the Planning Proposal?**

The site is located in an existing urban area and is serviced by all relevant utilities. It is unlikely that there are significant capacity constraints in the existing network which would prevent the modest intensified use of the site for a multi-level hotel and restaurant.

The proposal will increase pedestrian movement along the front of the site and to the nearby T-way bus station and footpath infrastructure is intended to be installed and upgraded. Need for any upgrade to local utilities such as electricity, can be addressed at a future development stage.

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

At this stage, the views of relevant State and Commonwealth authorities have not been obtained. This will occur following Gateway Determination.

## 3.4 Part 4 – Mapping

**Table 10** below shows the existing and proposed map amendments.




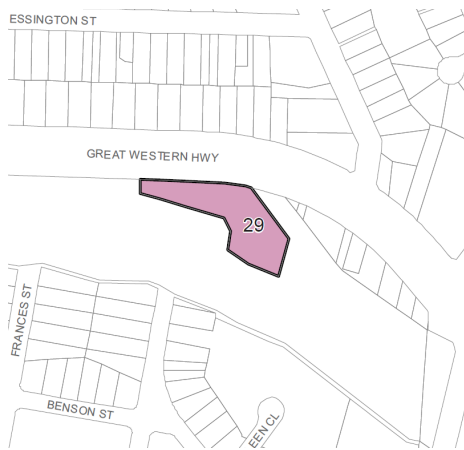
Table 10 – Existing and proposed map amendments	
Existing	Proposed
Height of Buildings Map – Sheet HOB_008	
<b>Maximum Building Height (m)</b>  9	<b>Maximum Building Height (m)</b>  9  27
	
<b>Figure 9:</b> Existing Height of Buildings Map (Source: NSW Legislation website)	<b>Figure 10:</b> Proposed Height of Buildings Map (Source: Mecone)
Floor Space Ratio Map – Sheet FSR_008	
<b>Maximum Floor Space Ratio (n:1)</b>	<b>Maximum Floor Space Ratio (n:1)</b>  1.1
	
<b>Figure 11:</b> Existing Floor Space Ratio Map (Source: NSW Legislation website)	<b>Figure 12:</b> Proposed Floor Space Ratio Map (Source: Mecone)

Table 10 – Existing and proposed map amendments

Additional Permitted Uses Map – Sheet APU_008	
Additional Permitted Uses	Additional Permitted Uses  Additional Permitted Uses
 <p><b>Figure 13:</b> Existing Additional Permitted Use Map (Source: NSW Legislation website)</p>	 <p><b>Figure 14:</b> Proposed Additional Permitted Use Map (Source: Mecone)</p>

### 3.5 Part 5 – Community Consultation

Normal consultation processes will occur following lodgement. It is expected that consultation will occur in line with the Council's Community Participation Plan, with the Planning Proposal to undergo 28 days public consultation period following gateway approval.

### 3.6 Part 6 – Project Timeline

The anticipated timeframe for the completion of the planning proposal, based on the benchmark timeframes for a standard planning proposal, is as follows:

Table 11 – Project Timeline	
Milestone	Date
Submission of the Planning Proposal	February 2022
Consideration by Council Local Planning Panel	July 2022
Council Decision	October 2022
Gateway determination	November 2022
Pre-exhibition	December 2022
Commencement and completion of public exhibition	January-February 2023
Consideration of submissions	February 2023
Post-exhibition review and additional studies	March 2023
Final Council Decision	April 2023
Submission to Department for finalisation	May 2023
Gazettal of LEP amendment	June 2023



## 4 Conclusion

This planning proposal for land known as 245 Great Western Highway, South Wentworthville has been prepared in accordance with:

- Section 3.33 of the Environmental Planning and Assessment Act 1979 (the Act).
- The NSW Department of Planning and Environment's '*Local Environmental Plan Making Guideline*'.
- Relevant Section 9.1 Directions.

The proposal provides a full justification for the changes consistent with the guidelines and requirements for plan amendments. The justification demonstrates that the proposal intention to amend the Cumberland LEP (CLEP) 2021 to increase the maximum height of buildings on the western part of the site from 9m to 27m, introduce an FSR control of 1:1 and add 'hotel or motel accommodation' and 'restaurant or cafe' as an additional permitted uses in Schedule 1 has strategic merit and site-specific merit in the particular circumstances of this location.



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