

Planning Proposal to amend Parramatta Local Environmental Plan 2023

23-27 HAROLD STREET
PARRAMATTA

FEBRUARY 2025



QUALITY ASSURANCE

Project:	Planning Proposal
Address:	23-27 Harold Street, Parramatta
Council:	City of Parramatta Council
Author:	Think Planners Pty Ltd
Template	Local Environmental Plan Making Guideline (August 2023)

Date	Purpose of Issue	Rev	Author	Authorised
August 2022	Draft Issue	A	SR	AB
August 2022	Lodgement	B	AB	AB
July 2024	Amended PP	C	EJ/BC	AB
August 2024	Amendment to PP	D	AB	AB
January 2025	Amended PP re NEPIA	E	AB	AB
January 2025	Amended PP for DPHI review	F	EJ	AB
February 2025	Amended PP for DPHI	G	AB	AB

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INTRODUCTION

This Planning Proposal aims to explain the intended effect and justify a proposed amendment to the Parramatta Local Environmental Plan 2023 (Parramatta LEP 2023) and demonstrate the strategic merit of the amendment proceeding.

This Planning Proposal seeks to amend the Parramatta LEP 2023 to allow for the redevelopment of the site for the purpose of mixed use development by:

- **Amending the maximum building height map to permit a maximum building height of 40m.**
- **Amending the maximum floor space ratio map to permit an FSR of 3.6:1.**

The Planning Proposal relates to 23-27 Harold Street, Parramatta, referred to within this document as the 'subject site'.

The planning proposal represents a considered response to the planning, design and heritage circumstances that are relevant to the broader area and also the local area. The planning proposal is an exemplar for how to manage the planning circumstances, in particular the way in which this site responds to the high density, activated and serviced Church Street corridor to the west of the site, and to the low density heritage conservation area to the east of the site.

The site is located within proximity of employment opportunities, educational establishments, recreational activities and public transportation within Parramatta CBD and Westmead Health Precinct

This report takes into consideration the changing strategic context of the area, noting that the recently finalised Parramatta CBD Planning Proposal deemed that land north of the Parramatta River would not proceed with rezoning. Notwithstanding, there was demonstrative strategic merits to the proposal and a deep compendium of existing strategic planning documents that support a thorough assessment and support of the proposal.

Relevantly and significantly, the subject site is situated adjacent 470 Church Street, which enjoys planning controls of up to 6.9:1 and 92m in height. A Design Excellence Competition has been undertaken on the site and a winning scheme endorsed. However, this proposal has been revised to reflect the current position of the City of Parramatta which has a lower FSR and height than previously envisioned via the original City Centre Planning Proposal which informed the Design Competition and winning scheme.

It is noted that the Department and Council previously supported a Planning Proposal that would provide an FSR of 6:1 plus a 15% design excellence bonus. At the time a Design Excellence Competition was undertaken, and Cox Architects were the winning

competitors. The planning proposal for the site did not proceed when the Council determined to remove the R4 zoned land in the precinct from the broader Parramatta CBD planning proposal.

The Planning Proposal is consistent with strategic planning initiatives of the City of Parramatta Council in late 2024, commonly referred to as the North East Planning Investigation Area (NEPIA). Furthermore, the urban design outcomes set out in a draft DCP by the City of Parramatta Council for the NEPIA precinct are complimentary with this Planning Proposal, and are the agreed mechanism for achieving these outcomes.

The amendments proposed in this Planning Proposal are specific to the site and will facilitate a new high quality residential development that will contribute to the vitality and activation of this precinct, by providing additional housing supply at the edges of the Parramatta City Centre. The Planning Proposal will contribute to the renewal of the CBD and character of Parramatta. The proposed amendments are driven by a desire to deliver a better built form outcome for the site and has been the subject of a design review by Architectus (June 2024) and heritage advice from Paul Davies Heritage Architects.

The proposed amendments to planning controls will facilitate the delivery of high quality development contributing to much needed housing supply within the strategic centre.

The Planning Proposal has been prepared in accordance with Section 3.33 of the Environmental Planning and Assessment Act 1979 and the Department of Planning and Environment's document Local Environmental Plan Making Guideline December 2021.

The Planning Proposal is supported by:

- The City of Parramatta Local Planning Panel Report of 11 April 2024.
- Urban Design Report by Architectus (20 June 2024).
- Heritage Report.
- Traffic Report.
- Draft City of Parramatta DCP for the North East Planning Investigation Area (NEPIA).

Support for the Planning Proposal is sought, and the subsequent referral to the Department of Planning and Environment for Gateway determination and public exhibition.

PLANNING PROPOSAL MERITS, INFRASTRUCTURE AND COMMUNITY BENEFITS

The Planning Proposal seeks to deliver the following key benefits:

- The planning proposal represents a considered response to the planning, design and heritage circumstances that are relevant to the broader area and also the local area. The planning proposal **is an exemplar** for how to manage the planning and heritage circumstances, in particular the way in which this site responds to the high density, activated and serviced Church Street corridor to the west of the site, and to the low density heritage conservation area to the east of the site.
- The Planning Proposal is **responsive to the immediate built form** and urban design factors/context that exist. The proposal seeks to provide an appropriate transition between high density residential and heritage, resulting in a “stepped” height transition from Church Street to the Sorrell Street Heritage Conservation Area and a clear distinction / buffer through the urban design methods of separation and open space.
- The proposed building envelopes by Architectus demonstrates a **high standard of design and amenity** can be achieved on the site. The scheme demonstrates Apartment Design Guide compliance separation between the development and adjoining sites. The scheme has been informed by several years of urban design commentary, studies and advice, much of which has been prepared by the City of Parramatta Council.
- The concept plan proposes to relocate an existing at-grade parking area at the rear of 53 Sorrell Street to within the basement level of the subject site, to provide a potential publicly accessible landscaped open space, which will enhance the setting of the Currawong House, provide a **clear visual and physical separation to the heritage precinct and improve connectivity with the public domain**.
- The proposal delivers a **variety of housing opportunities** adjacent to the Parramatta CBD. This enables the opportunity to create a genuine 30-minute city where housing is well connected to public transport, health services, education services, employment, and recreational facilities.
- The **proposal is consistent** with councils North-East Planning Investigation Area (NEPIA).

The subject land parcel is ideal for accommodating the proposed development as it is located within an accessible area and is consistent with the evolving character of developments within Parramatta. Furthermore, the development proposes to provide the opportunity to deliver a mixed-use development in a location experiencing an intensification in terms of development and considering the site's proximity to educational establishments, employment opportunities and recreational activities.

SITE HISTORY

This Planning Proposal has been prepared following discussions, reporting, assessments and meetings with relevant planning authorities and urban design experts. The following timeline represents the relevant background leading up to the Planning Proposal:

Date	Key event
April 2015	City of Parramatta Council endorses the Parramatta CBD Planning Strategy. The subject site is included in an area identified as potentially achieving an FSR of 6:1 and stating that further urban design refinement may alter height controls.
November 2015	SSPP lodged for 23-27 Harold Street seeking 6:1 FSR consistent with CBD Planning Strategy.
December 2015	Urbis Heritage study recommends site is upzoned, but a height transition be accommodated on the site between the Sorrell Street HCA (east) and the Church Street high density strip (west)
April 2016	Council adopts 6:1 FSR for the site.
June 2017	Hector Abrahams Architects Heritage Study recommends that the site retain 6:1 FSR and the land along Sorrell Street not be provided planning incentives. Extract from the study:



July 2017	City of Parramatta Council endorse the SSPP, to be forward to the Department for issuing of Gateway (6:1 and 70m)
September 2017	Department of Planning issue Gateway Determination in support of the Harold Street SSPP with an FSR of 6:1.
December 2017	City of Parramatta Council endorse a draft DCP for the SSPP site.
February 2018	City of Parramatta Council endorse a Design Excellence Competition Brief and competition commences for the SSPP site.

July 2018 Cox Architecture are announced as submitting the winning scheme, for a 25 storey building accommodating 124 residential apartments.



December 2018 Department of Planning issue Gateway Determination for Parramatta CBD Planning Proposal. The Gateway requires Council undertakes further consideration of “heritage interface areas”.

January 2019 Department of Planning issue Alteration of Gateway Determination for the Harold Street SSPP to extend the Gateway to September 2019.

November 2019 City of Parramatta Council resolve to excise areas of R4 zoned land, adjacent but not within the Sorrell Street HCA from the Parramatta CBD Planning Framework. Resulting in a change of policy for the land at 23-27 Sorrell Street.

December 2019 City of Parramatta Council resolve that a SSPP for the site immediately adjoining the subject site (at 470 Church Street) be rezoned to permit an FSR of 6:1 and HoB of 80m and forward to the Department for plan making.

June 2020 Council resolves to defer progressing the Planning Proposal until a policy is adopted for the planning investigation areas.

2020 City of Parramatta Council undertakes a review of the appropriate form between Church Street and Sorrell Street entitled “North-East Planning Investigation Area” that modelled various scenarios of 2:1, 3:1, 4:1, 5:1 & 6:1.

February 2021 Amendment No.47 to the Parramatta LEP 2011 is made that for the site immediately adjoining the subject site (at 470 Church Street) receives an FSR of 6:1 and HoB of 80m.

April 2022 Plan Finalisation Report by Department of Planning for Parramatta CBD removes all land north of Parramatta River from the CBD PP.

August 2022 SSPP Planning Proposal lodged for 23-27 Harold Street and 53 Sorrell Street proposing FSR 5:1 and HoB of 60m and relevant transition urban design model.

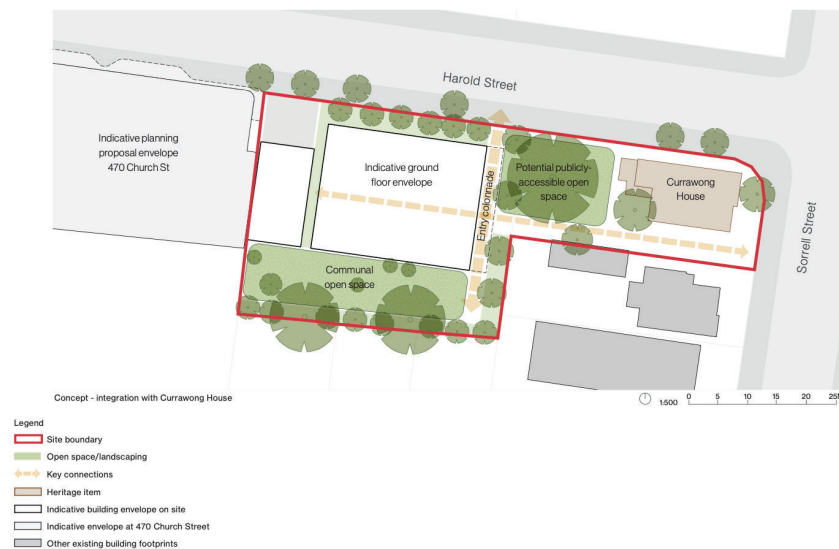
October 2022 Department of Planning announce that a North Parramatta Place Strategy will be prepared, led and funded by the Department.

(NB in October 2023 the Department advise industry that the Strategy for the Precinct will not proceed, but that a portion of the Precinct will be rezoned.)

October 2023 Premier Minns and Minister Scully announce that land in North Parramatta will be subject to a SEPP before the end of 2023 that will implement planning controls identified by the City of Parramatta Council in earlier versions of the Parramatta CBD Planning Proposal.

The subject site is once again excluded, despite it being adjacent land already 6:1 and 80m; is not within the HCA; and has a SSPP that proposes a methodology for transition on the site between these areas.

The transition methodology is partly illustrated in the following diagram –



November 2023 The City of Parramatta Council at its Meeting on 20 November 2023 resolve to endorse a phased work program to review various “planning investigation areas”.

The first investigation area relates to the land in the vicinity of the subject site. Council has noted in correspondence:

Investigation and planning work has previously been completed on the North-East (NE) PIA as part of the NE PIA Planning Strategy. Phase 1 will commence further technical work and the preparation of a planning proposal to determine future planning controls for the area.

This work is scheduled for early 2024.

December 2023 SEPP (Church Street North Precinct) is made and identifies increased FSR and Height controls for land along Church Street up to 5:1 and 63m (excluding design excellence bonus provisions).

The land immediately west of the subject site is unchanged by the SEPP and remains 6:1 and 80m (excluding design excellence bonus provisions).

December 2023 The proponent makes a VPA offer to the Council in relation to the planning proposal.

	The VPA was never was agreed with Council and does not form part of this Planning Proposal.
31 January 2024	Rezoning Review request made to the DPHI
4 March 2024	Council provide correspondence to DPHI on rezoning review
11 April 2024	<p>Council publish their North East Planning Investigation Area (NEPIA) Study, to be reported to the Local Planning Panel, proposing amongst other matters:</p> <ul style="list-style-type: none"> – Increase the FSR over the subject site to 3.6:1 – Permit a maximum height of 40m.
11 April 2024	Rezoning Review meeting, where proponent agreed to align with the NEPIA study.
16 April 2024	Council's LPP recommended proceeding to a Gateway Exhibition
3 May 2024	<p>DPHI advised proponent that the Planning Proposal should proceed for a Gateway Determination as the proposal has strategic merit and subject to changes, site specific merit.</p> <p>The Panel recommends that prior to the Planning Proposal Authority submitting the planning proposal for a Gateway determination, the proposal is to be revised to address the following:</p> <ul style="list-style-type: none"> • the removal of 53 Sorrell Street, Parramatta from the Planning Proposal; • increase the maximum building height (HOB) from the existing 11m to 40m; • increase the maximum floor space ratio (FSR) from the existing 0.8:1 to 3.6:1; • no Design Excellence provision is to apply to the site; and • update the Planning Proposal and supporting reports in accordance with the above points and the LEP Making Guidelines (August 2023) to reflect the Panel's decision.
May 2024	Council resolve to forward a planning proposal to the DPHI for gateway determination for NEPIA.
May 2024	Department commence review of Council Planning Proposal.
June 2024	Urban Design Study by Architectus and Planning Proposal by Think Planners updated to reflect the advice of the Sydney Central City Planning Panel.
Sept 2024	Gateway issued for NEPIA Planning Proposal.
Nov-Dec 2024	Public Exhibition of the NEPIA Planning Proposal and draft DCP amendments.



SITE AND LOCALITY DESCRIPTION

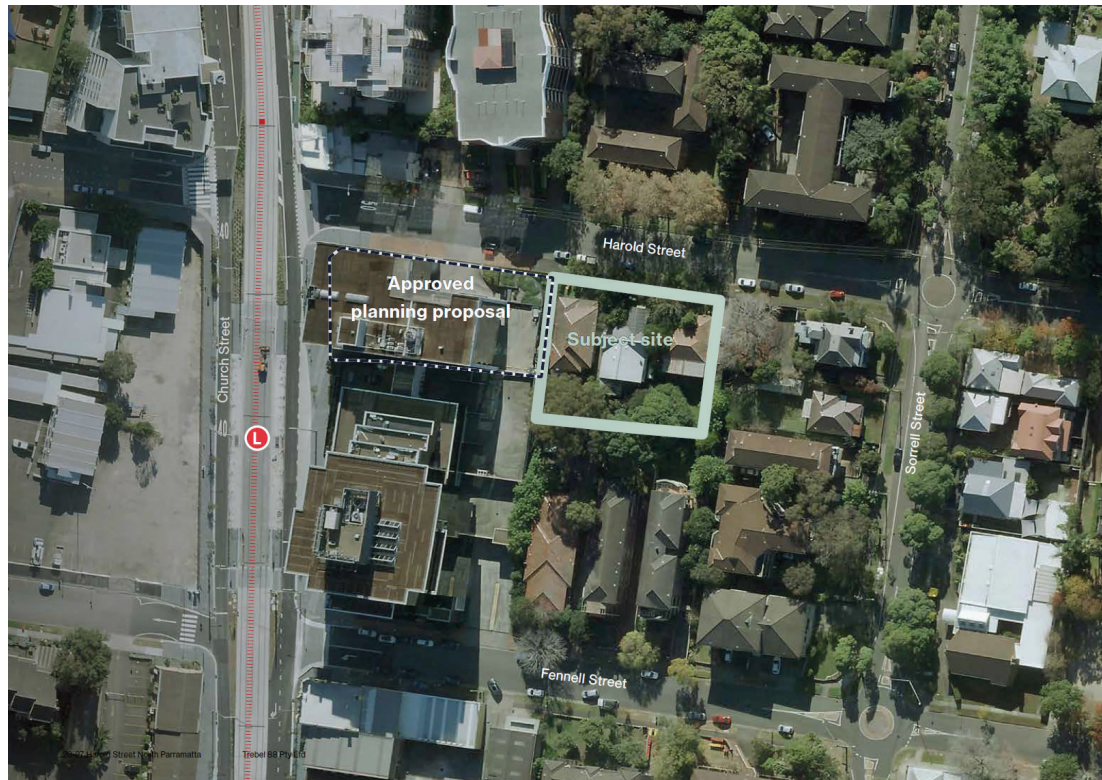
LEGAL DESCRIPTION

The subject site is legally defined as the following, with Figure 1 providing an aerial view:

Legal Definition

No. 23 Harold Street, Parramatta	Lot 3 DP18261
No. 25 Harold Street, Parramatta	Lot 4 DP18261
No. 27 Harold Street, Parramatta	Lot 5 DP18261

Figure 1: Subject site (Architectus)



EASEMENTS OR RESTRICTIONS

There are no known easements or relevant restrictions for this site.

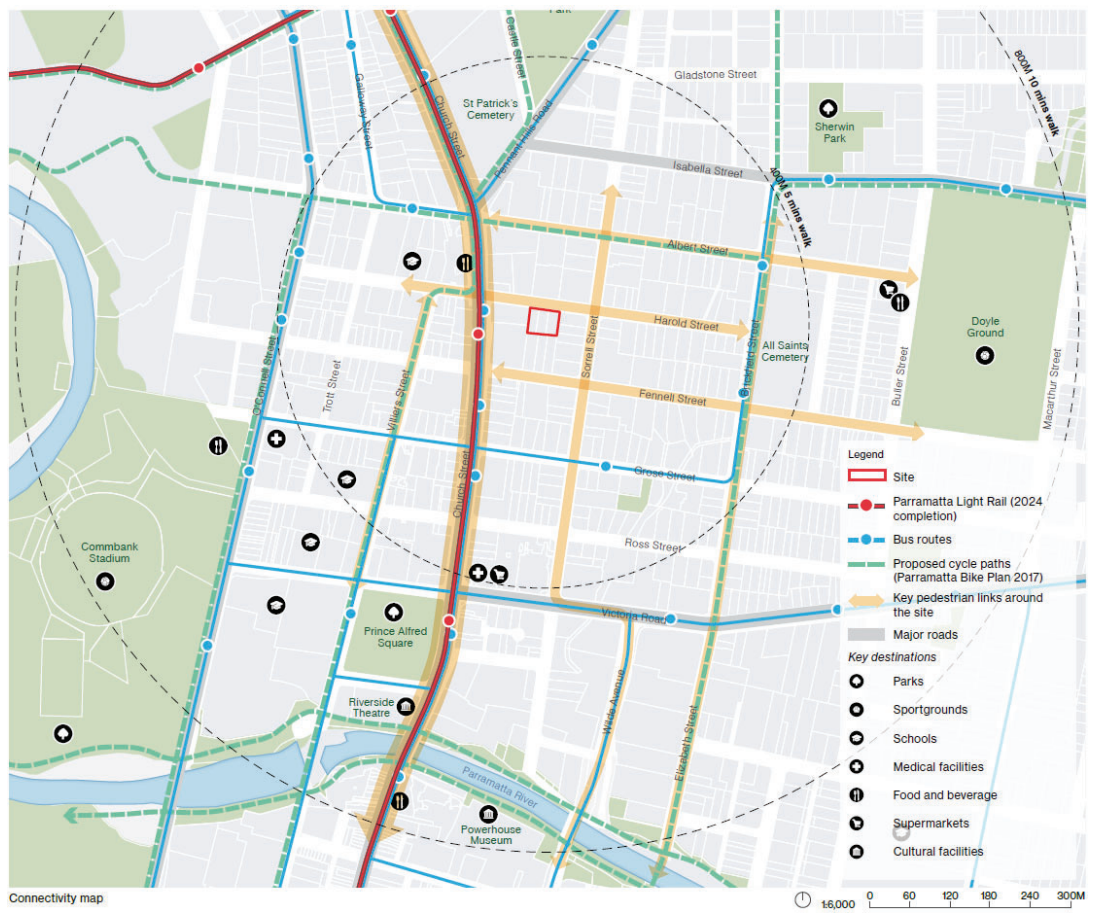
TOPOGRAPHY AND VEGETATION

The land has been developed for urban purposes for many years and vegetation remaining on the site is minimal. The tree at the rear of the heritage item is to be retained and considered in future design.

CONNECTIVITY

At present each site benefits from a single access residential standard driveway from Harold Street.

Figure 2: Subject site (Architectus)



The subject site is highly accessible from both bus based public transport and also the Parramatta Light Rail, which is anticipated to open in the second half of 2024. Connectivity will further enhance with the opening of State 2 of the Parramatta Light Rail which will connect the subject site to Sydney Olympic Park via Melrose Park.

Whilst the site is outside of 800 m from the Parramatta River Ferry and future Metro, analysis by Architectus has confirmed that there are a number of important pedestrian routes and also bicycle paths which further enhance accessibility.

Analysis from Architectus as part of their urban design study also confirms that the site is highly accessible to local infrastructure and facilities including open spaces, entertainment and cultural places, along with medical uses, schools and supermarkets

ABORIGINAL HERITAGE

The development site is not identified as containing Aboriginal Heritage under the Parramatta LEP heritage map and is nominated under the Parramatta DCP as having low sensitivity to Aboriginal Heritage.

EUROPEAN HERITAGE

The subject site is comprised of 3 dwellings. The 3 lots located at 23-27 Harold Street are not heritage listed or in a conservation area. The subject site as mentioned earlier in this report, adjoins 53 Sorrell Street to the west which is identified as a local heritage item in Schedule 5 of the Parramatta Local Environmental Plan and is located within the Sorrell Street Conservation Area, as are the adjoining dwellings to the south of 53 Sorrell Street.

This is evident via heritage map extract provided below. As outlined in detail later in this report, the proposed density uplift is considered to result in an appropriate balance of strategic growth and retention of local heritage character.

Relevantly, the built form and reference design for this planning proposal has been informed by a series of principles and commentary of Paul Davies heritage architect. These principles have considered the most appropriate way to deal with the transition of height and density from the Church Street corridor to the west, to the heritage conservation area and items to the east. The planning proposal adopts the principles set out by Paul Davies and represents an exemplar response in the precinct. More recently Heritage 21 were engaged to make commentary on a modification to the proposal to reduce the proposed height and FSR. Support for the proposal, with respect to heritage, was maintained in this recent analysis.

Figure 3: Heritage Map Extract HER_009 (Source: Parramatta LEP 2023).



ARCHAEOLOGY

There are no known Items of Aboriginal Heritage located on the site. This is not a relevant consideration for the planning proposal and will be thoroughly investigated as part of any future development application process.

Opportunities to salvage archaeological items unearthed during demolition works are to be considered. If any items are found during the demolition and excavation, in the first instance, opportunities to salvage and reuse the items are to be incorporated. When this is not practical or possible, an interpretation strategy will be prepared.

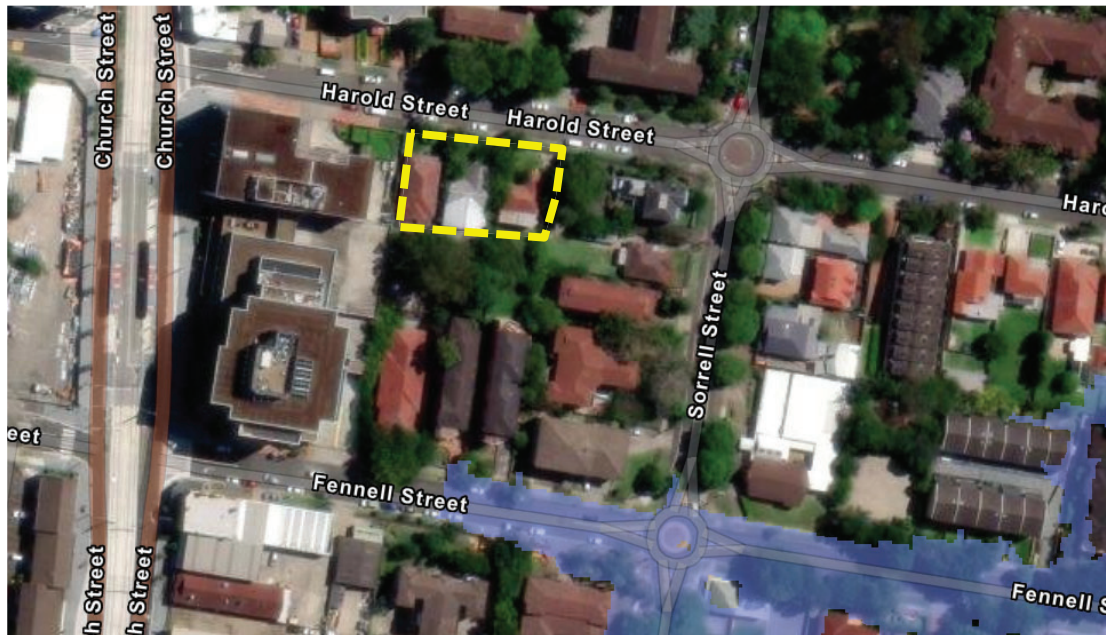
ECOLOGY

The subject site is predominantly clear of vegetation.

DRAINAGE AND FLOODING

The subject site is not affected by flooding and this matter is appropriate for further civil consideration at the time of development application.

Figure 4: Draft Flood Study (Source: City of Parramatta, 2023).



 - The site

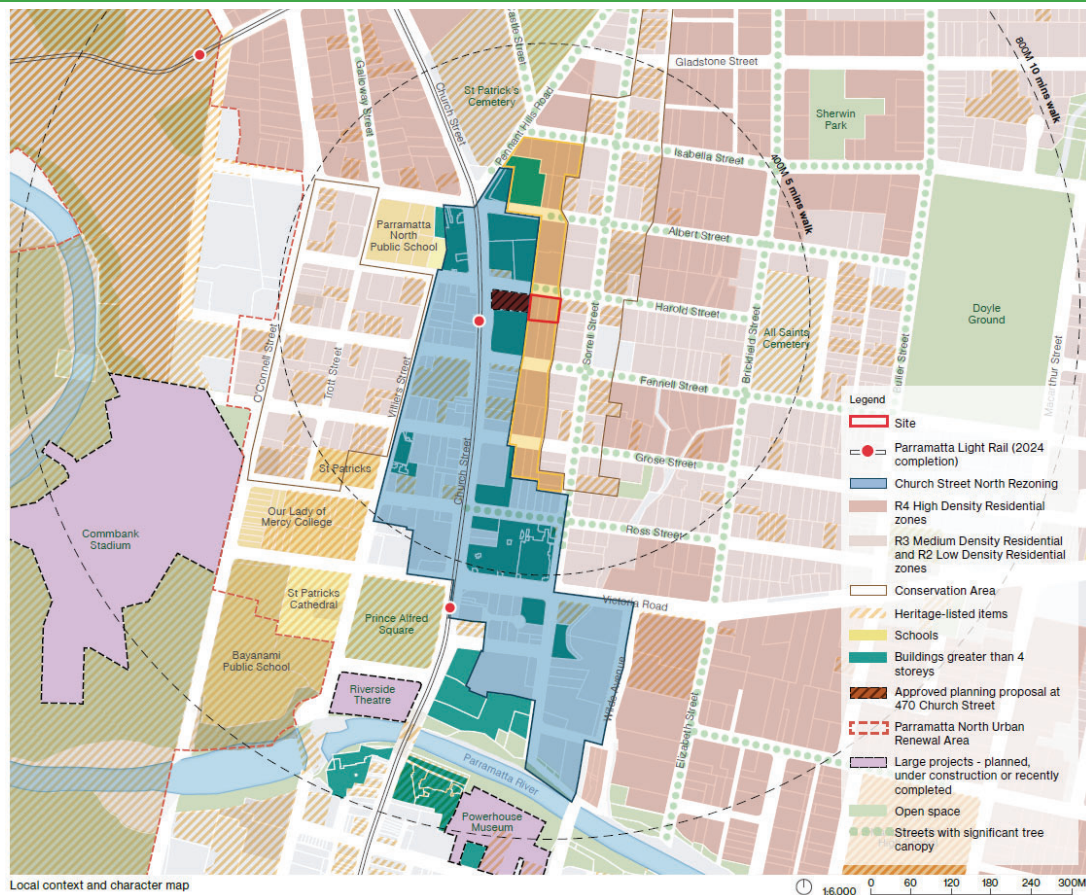
ACID SULFATE SOILS

The site is identified as containing Class 5 Acid Sulfate Soils as shown in the Parramatta LEP 2023. A preliminary site and soil assessment is to be conducted as part of the future development application.

SITE CONTEXT AND SITE ANALYSIS

The site is located at 23-27 Harold Street, Parramatta. The site comprises of 3 allotments and can be best described as a regular shaped allotment with a frontage of approximately 45m to Harold Street, and a site area of 1,654.2m² (by calculation).

Figure 5: Immediate Context (Source: Architectus)



The subject land is located within a 1.6km walking distance from Parramatta train station and a short walk from the Parramatta CBD. The site is also within close proximity to the Parramatta Light Rail, which is expected to open in 2024, and the Parramatta Metro Station which is expected to be operational in 2030. The site is within proximity to recreational activities, educational establishments and employment opportunities including:

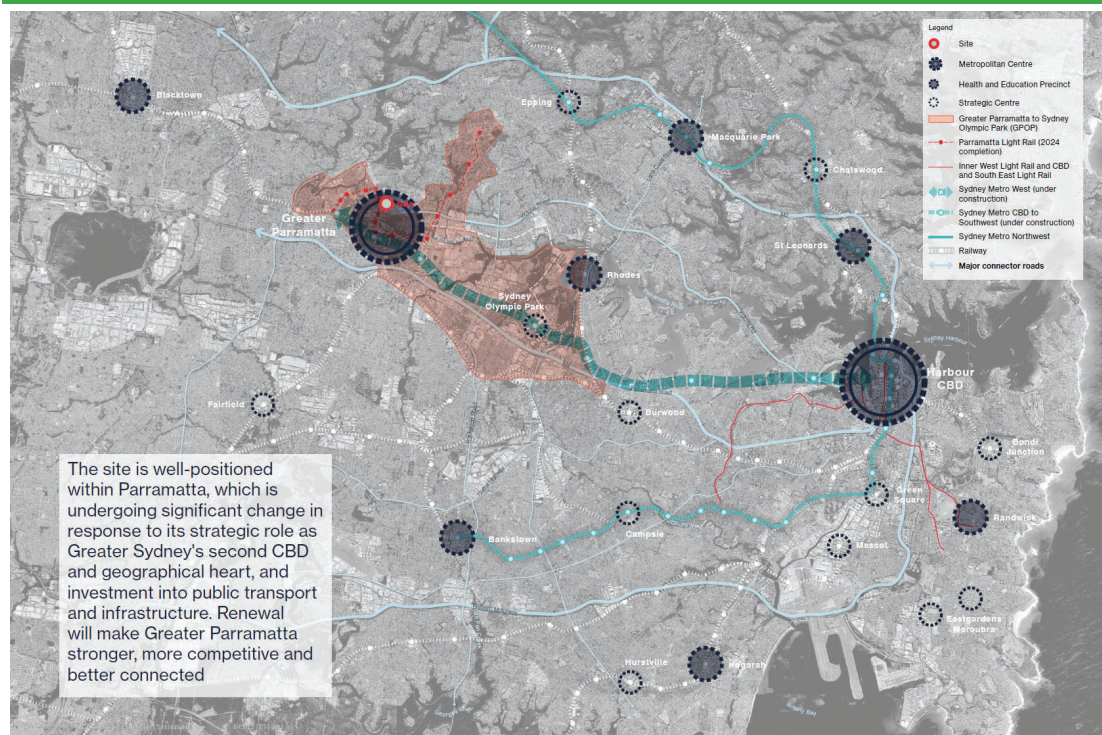
- Commercial premises (along Church Street).
- Westfield Parramatta.
- Parramatta Railway Station and Bus Interchange.

- Westmead Hospital.

The immediate locality is characterised by a mix of uses and built form. To the west of the site is the northern edge of the current city centre boundary. Immediately adjacent the site to the west is a five-storey commercial building at 470 Church Street, which was subject to a recent planning proposal to increase the maximum height limit to 80m (+15%). The northern end of the city is characterised by a wide variety of built forms of various ages and diversity of land uses. To the east of the site is the Sorrell Street conservation area which has a mix of housing forms and ages, comprised of small heritage dwellings and 2 to 4 storey residential flat buildings.

The subject site is situated immediately adjacent to the current boundary of the Parramatta CBD and is bound by Harold Street to the north, and residential property to the east, south and west.

Figure 6: Strategic Context (Source: Architectus).



The following photographs below provide a visual representation of the local context and character

Figure 7: Local Context (Architectus)



The main part of the site with development potential sits between an existing commercial building (soon to be redeveloped into a 27-storey mixed use building) and the heritage listed 'Currawong'. (View from the corner of Harold and Sorrell Street looking towards the site)



The area of Church Street at its intersection with Pennant Hills Road has changed in character in the last 10 years with two mixed use developments of 12-14 storeys marking the northern entrance into the Parramatta CBD. (View from the intersection of Church Street and Pennant Hills Road looking south)



The Parramatta Light Rail is currently under construction and due to open in 2023. Currently this portion of Church Street consists of a mix of built form character and quality including 1-2 storey commercial/retail buildings, large commercial buildings up to 8 storeys and mixed use buildings up to 14 storeys. (View from Church Street looking north)



Harold Street is a tree-lined street with a mix of single dwellings and apartment buildings up to 6 storeys. (View from the intersection of Harold and Brickfield Street)



Example of a residential flat building located within the Sorrell Street conservation area. (View from the corner of Sorrell and Albert Street)



Grouping of heritage items on Sorrell Street. (View from Sorrell Street near the intersection with Fennell Street, looking northeast)



LOCAL PLANNING FRAMEWORK

PARRAMATTA LOCAL ENVIRONMENTAL PLAN 2023

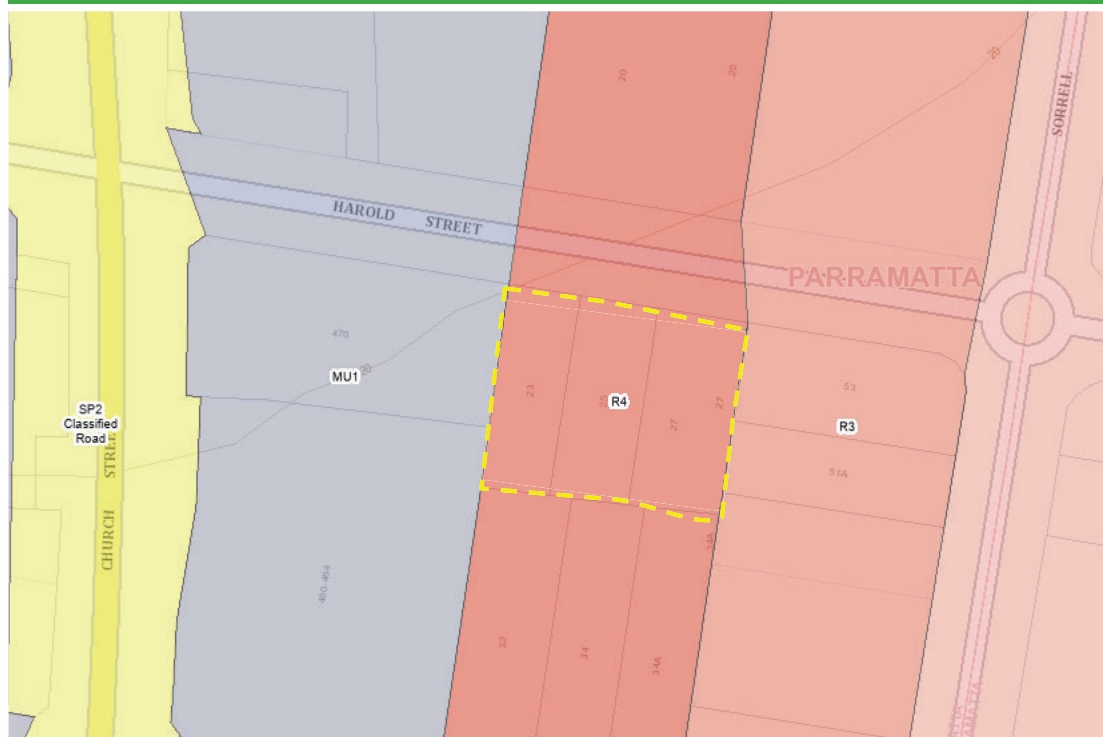
Parramatta LEP 2023 is the principal Environmental Planning Instrument that applies across the City of Parramatta council local government area. Amongst other matters, it controls the land use arrangements over the land (zoning), along with other relevant considerations to this planning proposal including building height and floor space ratio. For completeness, this planning proposal also considered local heritage, which is also addressed in Parramatta LEP 2023

The key planning provisions that currently apply to the subject site are identified below.

ZONING

The subject site is currently zoned R4 High Density Residential under *Parramatta Local Environmental Plan 2023 (Parramatta LEP 2023)*. Figure 4 is an extract from the land zoning map for Parramatta LEP 2023. The land is currently zoned R4 High Density Residential, and this Planning Proposal does not seek to amend the existing zoning.

Figure 8: Extract from Parramatta LEP 2023 Land Zoning Map (Spatial Viewer)



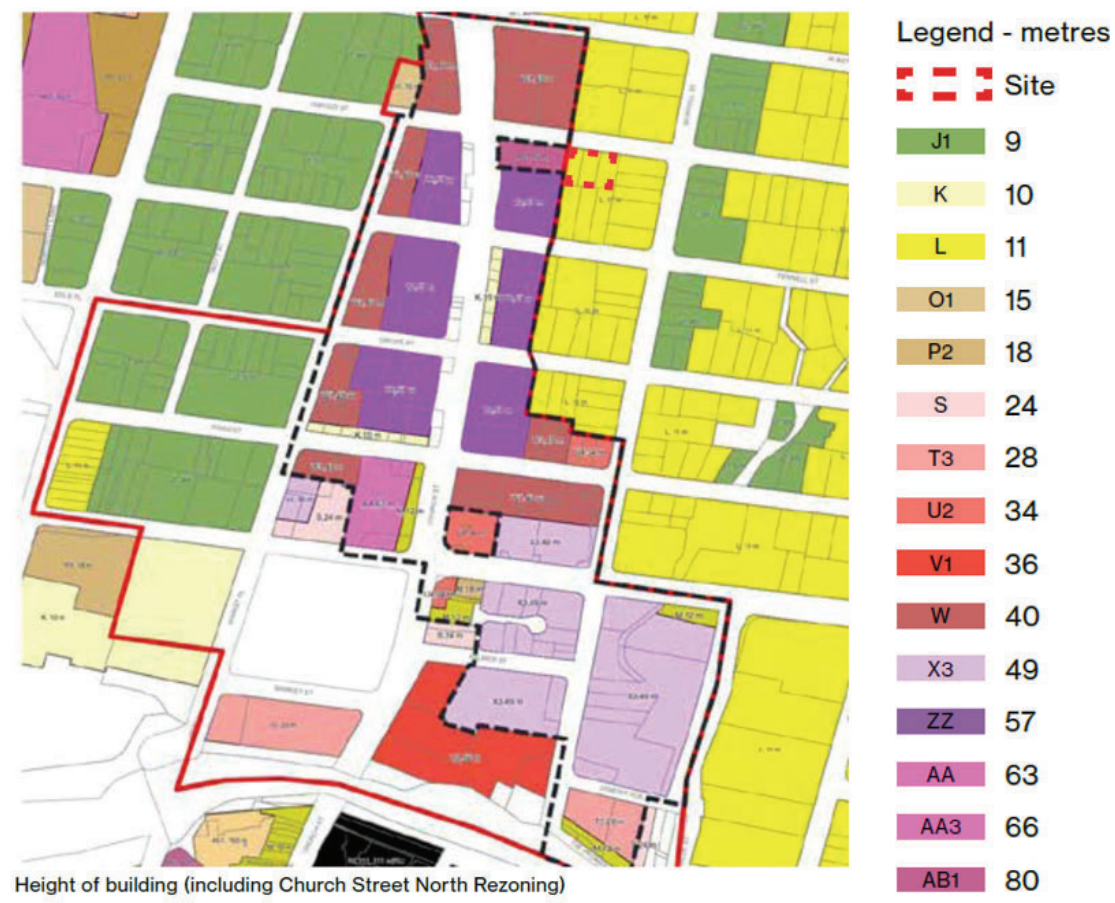
EXISTING BUILDING HEIGHT

The Height of Buildings Map for the Parramatta LEP 2023 indicates that the maximum building height permitted on the subject site is 11m.

It is noted that the adjoining site to the west (470 Church Street) has a maximum building height of 80m.

From 1 July 2024 the Church Street North Precinct Rezoning will come into effect. This will on other sites facilitate a maximum building height of 57-63m (plus design excellence bonus).

Figure 9: Extract from Parramatta LEP 2023 Height of Buildings Map (Architectus)



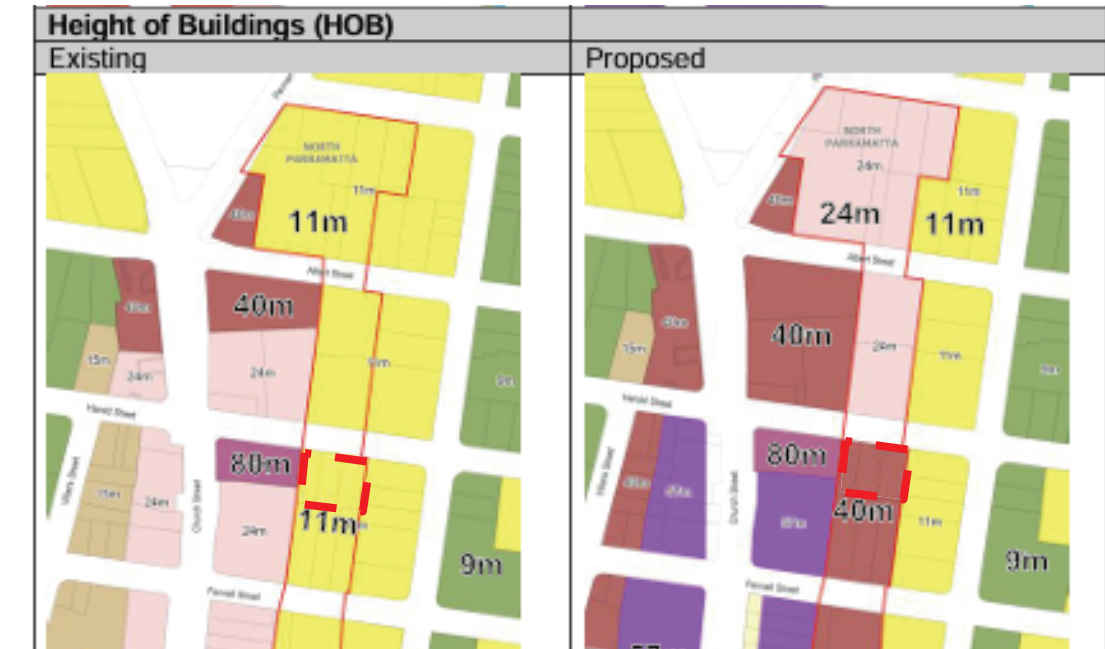
PROPOSED BUILDING HEIGHT

This Planning Proposal seeks to amend the height of building to 40m for 23-27 Harold Street, and no Design Excellence provision is to apply to the site.

Importantly, this is consistent with the recent planning proposal put forward by the City of Parramatta. Under the Council Planning Proposal an HOB 40m is applied over the

subject site and provides for the desired transition in scale to the Sorrell Street Heritage Conservation Area.

Figure 10: Extract from Parramatta Council Planning Report (16 April 2024)

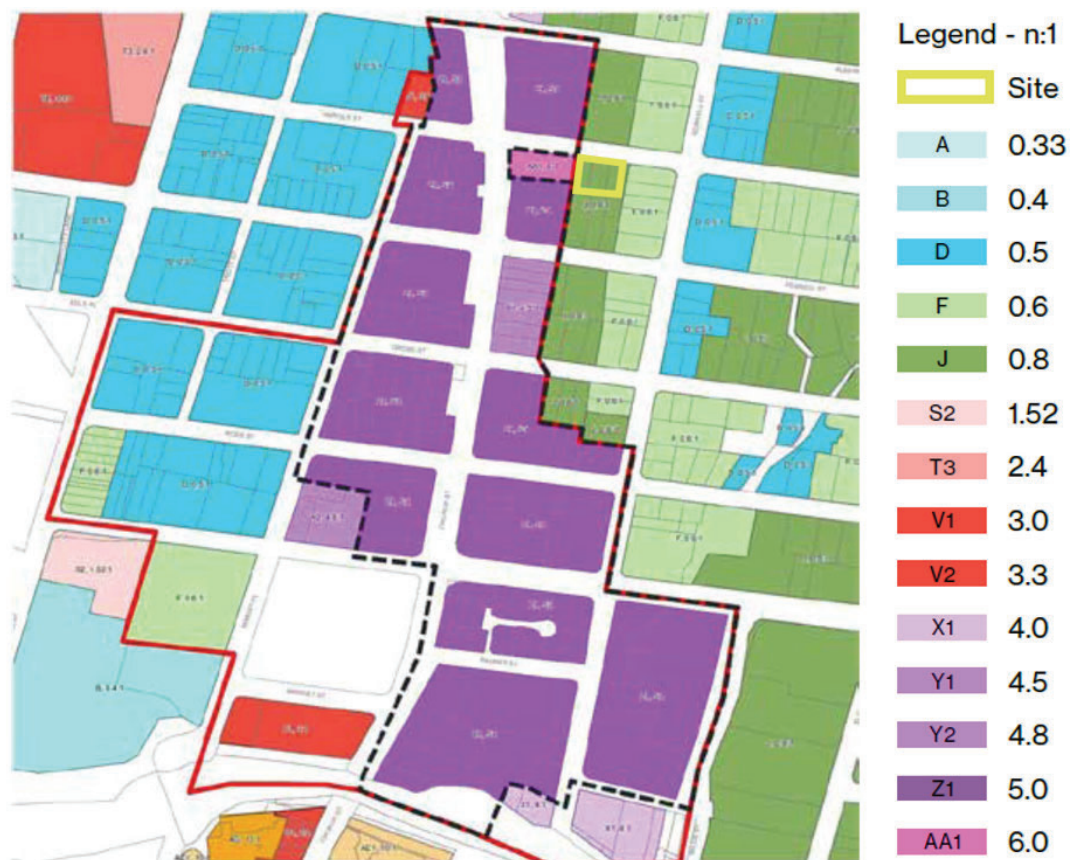


EXISTING FLOOR SPACE RATIO

The current Floor Space Ratio Map for the Parramatta LEP 2023 indicates that the maximum floor space ratio for a building on the subject site is 0.8:1 for 23-27 Harold Street. It is noted that the adjoining site to the west (470 Church Street) has a maximum floor space ratio of 6:1.

More broadly it is noted that from 1 July 2024, land within the Church Street North rezoning area will typically have an FSR of 4.5-5:1 plus design excellence bonus.

Figure 11: Extract from Parramatta LEP 2023 Floor Space Ratio Map (Architectus)



Floor Space Ratio (including Church Street North Rezoning)



PROPOSED FLOOR SPACE RATIO

This Planning Proposal seeks to amend the maximum floor space ratio to 3.6:1 for 23-27 Harold Street, no Design Excellence provision is to apply to the site..

Importantly, this is consistent with the recent planning proposal put forward by the City of Parramatta. Under the Council Planning Proposal an FSR of 3.6:1 is applied over the subject site and provides for the desired transition in scale to the Sorrell Street Heritage Conservation Area.

Figure 12: Extract from Parramatta Council Planning Report (16 April 2024)

Local Planning Panel 16 April 2024

Item 6.2





HERITAGE

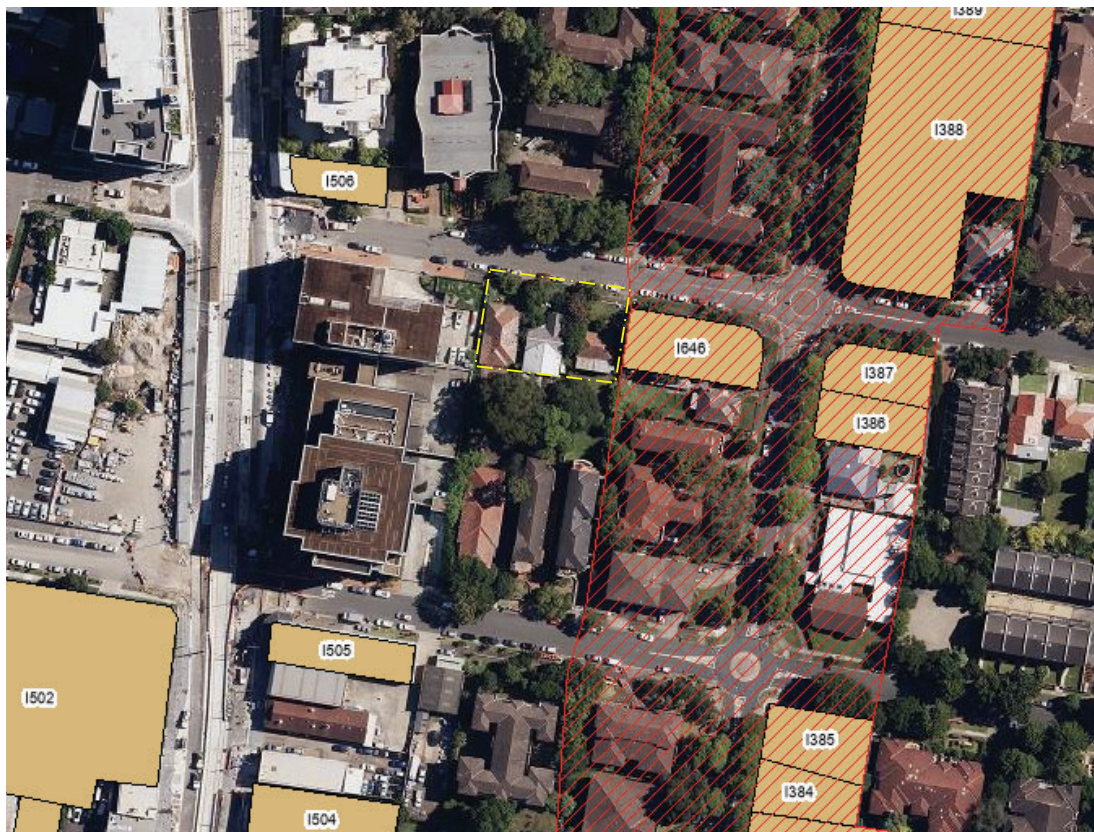
The subject site is comprised of 3 dwellings. The 3 lots located at 23-27 Harold Street are not heritage listed or in a conservation area. As mentioned earlier in this report, the adjoining 53 Sorrell Street is identified as a local heritage item in Schedule 5 of the Parramatta Local Environmental Plan and is located within the Sorrell Street Conservation Area, as are the adjoining dwellings to the south of 53 Sorrell Street.

This is evident via heritage map extract provided below. As outlined in detail later in this report, the proposed density uplift is considered to result in an appropriate balance of strategic growth and retention of local heritage character.

Relevantly, the built form and reference design for this planning proposal has been informed by a series of principles and commentary of Paul Davies heritage architect. These principles have considered the most appropriate way to deal with the transition of height and density from the Church Street corridor to the west, to the heritage conservation area and items to the east. The planning proposal adopts the principles set out by Paul Davies and represents an exemplar response in the precinct.

As per Council advice and also direction from the SCLPP, the subject site does not include the heritage item “Currawong House”.

Figure 13: Heritage Map Extract from Parramatta LEP 2023 (Spatial Viewer)



Attached as part of this planning proposal is an addendum letter to the original heritage report which confirms that the proposed built form will not result in an adverse impact to the neighbouring heritage item on the eastern boundary, 53 Sorrell Street. The letter concludes as follows;

“The built forms arising from the proposed modified controls are capable of achieving a high quality design and urban outcome for the location with minimal heritage impacts on the SSHCA, the heritage items at 53 Sorrell Street and 426 Church Street or Olde Government House.”

Therefore this planning proposal is supportable and continues to protect the significance of the neighbouring heritage items.

THE CONCEPT

The urban block within which the subject site is located has seen a significant amount of development activity and planning approvals over recent years since the introduction of the Parramatta CBD planning strategy. The precinct is undergoing an urban design renaissance led by the soon completion of the Parramatta Light Rail along Church Street and related public domain transformation. The urban design for the subject site has been grounded in visual analysis of the area. This approach allows for a thorough assessment of different built form scenarios to ensure that important heritage places, along with views to and from are maintained.

It is important to note that this detailed testing by Architectus has confirmed that development can occur, consistent with the parameters within the Council's own planning proposal. For reference, a consolidated height map is below that includes the CoP planning proposal over the subject site in context with other building height controls 40m and above that already exist.

SITE CONTEXT

The subject site is sandwiched between the Church Street North Rezoning Corridor and the Sorrell Street Heritage Conservation Area. Broadly, the area includes strata apartment buildings which may eventually redevelop, along with a range of smaller lots. These smaller lots if consolidated into a larger landholding could be redeveloped as generally, they are free from heritage or strata constraints.

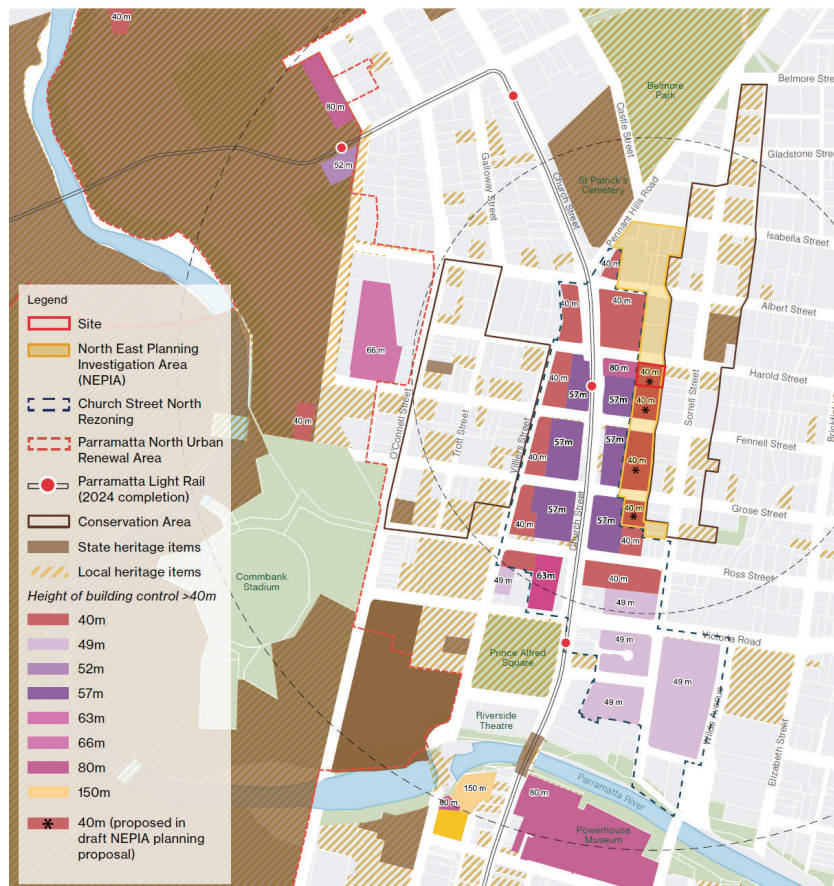
Adjacent to the site and on the corner of Harold Street and Church Street is 470 Church Street. This site has an 80m height limit (approximately 27 storeys) and will be a landmark building in the precinct, being the tallest. From this site moving east, the height dramatically drops to 40m under this planning proposal (and the council planning proposal) to facilitate an effective transition to the heritage conservation area.

More typically, the Church Street North Precinct has heights between 40m and 63m, noting that these towers are in close proximity to both heritage values within and beyond the precinct.

Further to the north west is the State Significant Precinct Parramatta North. This when completed will be a precinct that includes towers up to 80m tall with a more typical range between 40m and 66m. Within this area future development will be a mix of infill along with heritage led renewal.

A number of large government-led redevelopment of sporting, entertainment and cultural venues have been undertaken within 400-800 m of the subject site. These include CommBank Stadium, the redeveloping Riverside Theatre and Parramatta Park. Also currently under construction is the Powerhouse Parramatta, which is anticipated to open in 2025.

Figure 14: Heritage map overlayed with heights 40m and above, including CoP Planning Proposal (Architectus Urban Design Report).



The merit of the proposed additional building height and density in this planning proposal must be seen in the context of surrounding development. This submission seeks a height limit of 40m, which will allow for a development of approximately 12 storeys, based on allowances for ground level change, 3.2 m floor to floor, and lift overrun.

This height is considered to result in an appropriate balance between strategic growth, reinforcement of the Church St corridor character, and equally the preservation of nearby local character to the east. Importantly, it retains consistency with the council initiated planning proposal which includes the subject site.

The development seeks to provide a transition between Church Street North, which has long been earmarked for higher density as part of the Paramatta CBD and numerous planning studies, and the Sorrell Street heritage conservation area, which will retain the existing density controls to preserve the heritage character of area.

Figures 7 & 8 overleaf represent the existing density controls of the locality and also an indicative density potential for the precinct.



Figure 15: Existing Density Controls (Architectus Urban Design Report).



 - Subject Site

Figure 16: Proposed Density Controls (Architectus Urban Design Report).



 - Subject Site

PLANNING PROPOSAL FOR NORTH EAST PARRAMATTA (NORTH-EAST PLANNING INVESTIGATION AREA)

The City of Parramatta reported to its LPP on 16 April 2024 a Planning Proposal for the North East Planning Investigation Area (NEPA). The Planning Proposal put forward amongst recommendations for the broader area, the following increase in FSR and Building Height for the subject site:

- FSR of 0.8:1 to 3.6:1 and;
- HOB of 11m to 40m

Importantly, the report included testing of new controls over the subject site as part of the analysis of the council proposal, along with draft DCP controls.

The LPP report states the following with regard to the subject site:

23. The recommended FSR and height limit for the site at 23-27 Harold Street, Parramatta (which is also currently subject to a rezoning review), was determined using the same built form principles and outcomes-based approach for the NEPIA. The maximum FSR of 3.6:1 and a 40m height limit is proposed for site noting this slightly higher FSR reflects the efficiencies of a

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smaller sized site (see **Figure 4**). Further details are contained in **Attachment 1**.

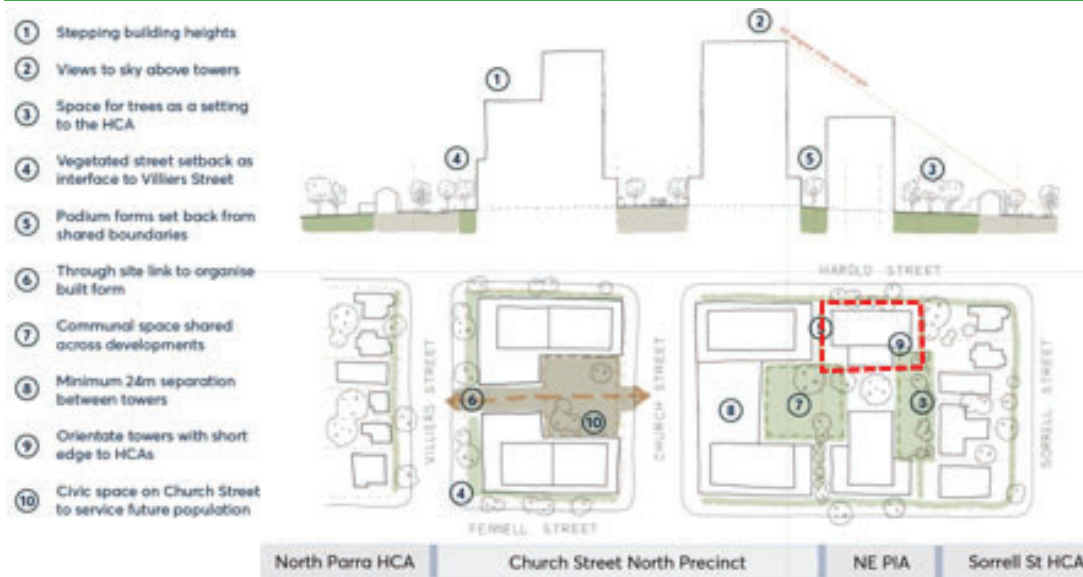
The LPP unanimously voted to support the Report Recommendations with the following reason provided:

REASONS

The Paramatta Local Planning Panel generally agrees with the Council Officer's report.

The figures below show the testing undertaken by Council over the subject site, with this planning proposal being entirely consistent with this.

Figure 17: Proposed Density Controls (CoP LPP Report of 11 April 2024)



 - Subject Site

Figure 18: Proposed Density Controls (CoP LPP Report of 11 April 2024)



 - Subject Site

Following the LPP meeting, Council at its meeting of 27 May 2024 considered the NEPIA planning proposal where it was resolved to forward the Planning Proposal to the DPHI for a Gateway Determination. On 31 May 2024, the DPHI commenced consideration of the Council Planning Proposal, and a Gateway was issued by the Department in September 2024. The NEPIA Planning Proposal and draft DCP amendments were exhibited November-December, with the exhibition closing on 19 December 2024.

This planning proposal is:

1. Consistent with the council led Planning proposal, in terms of the proposed amendments to the Parramatta LEP 2023.
2. Consistent with the adopted position of the City of Parramatta, which was based on an urban design study prepared by Hassall during the State led Church Street North Project.
3. Consistent with the City of Parramatta NEPIA Planning strategy which is described below:

*“The recommendations for NEPIA are based on **comprehensive approach to transition** as required by the Department that includes a combination of both building height and site planning. The method for transition includes stepping in building height from Church Street properties to the Sorrell Street HCA, but also includes further design principles”*

4. Consistent with the recommended reasons for the height and FSR within the Council initiated planning proposal for the NEIPA area:

“The recommended height of building controls for the NEPIA are based on;

- *The ‘viewed’ approach detailed in the Department-commissioned consultant study that informed mapped building heights in the CSN SEPP. Applying a 60- degree field of view sightline, views to sky are maintained above buildings providing a transition in height and protecting the setting of the heritage conservation area.*
- *Creating a mapped skyline strategy which steps down from the concentrated height on Church Street towards the Sorrell Street HCA, but also northwards towards the surrounding low-scale residential areas of North Parramatta,*
- *An acknowledgement of sites within the CNS Precinct north of Harold Street that are unlikely to redevelop due to large, 5-8 storey residential strata subdivisions.*

The recommended FSR controls for the NEPIA are based on;

- *Achieving workable FSRs that align with the proposed height of building controls.*
- *Reinforcing the height transition through inter building setbacks, street setbacks, building orientation, and location of landscape areas*

- *Creating workable residential floor plates within a slender tower form and podium, with space for deep soil and communal open space.*

5. Consistent with the Draft DCP amendments relevant to the site. The statutory planning controls within the LEP, along with the draft DCP controls, will be the mechanism which facilitates the intended urban design outcomes for the site and precinct.

The proposed development form as part of this planning proposal is clearly therefore consistent with councils' approach in seeking a lower FSR and HOB than the site located on the western boundary. The proposed controls will enable the stepping down of the height of the buildings from Church Street down towards the Sorrell Street Heritage Conservation Area.

In addition, the proposed built form is consistent with the councils' vision in protecting view to the sky, providing adequate transition in height to protect setting of the heritage conservation area. Further as see in the urban design report, the height transitions are maintained with a tall slender residential tower form which is consistent with councils proposal.

The urban design outcomes for the site will be informed by the future DCP controls applicable to the site and the NEPIA generally. The draft DCP controls exhibited by the Council appropriately facilitate the intended urban design outcomes of both the site specific Planning Proposal and the broader NEPIA Planning Proposal. There is no contradiction arising in the site specific planning proposal with the draft DCP controls and the appropriate mechanism for facilitating the urban design outcomes will comprise the LEP controls and the draft DCP controls.

TRAFFIC

The subject site is immediately proximate to a prime public transport corridor (Parramatta Light Rail) and also an extensive variety of sustainable transport options available, including heavy rail, Rivercat, buses, walking, cycling and the future Sydney Metro station. It is noted the locality has excellent connectivity with access to several key arterial / classified / key road networks including George Street, Church Street, the M2 and M4 Motorways, Pennant Hills Road, and James Ruse Drive.

A traffic report has been prepared that is appropriate for the purposes of a Site Specific Planning Proposal. The report appropriately confirms the sites access to public transport, notably the Parramatta Light Rail. The report adopts the Parramatta CBD parking rates.

Relevant to this SSPP the report refers to the intention to include within the basement of 23-27 Harold Street the parking for Currawong House. This gives rise to the opportunity to ensure that the rear of Currawong House is sensitively treated with

respect to its heritage status as discussed elsewhere in this report and referenced in the attached urban design study.

HERITAGE

Paul Davies Heritage Architect has been engaged to provide heritage analysis of the relationship of potential development on the subject site in relation to the adjacent heritage item (Currawong on the corner of Sorrell and Harold Streets) and the Sorrell Street heritage conservation area. Paul Davies has provided a report which concludes that;

“The proposed built form that incorporates the adjacent heritage item as part of the site is capable of achieving a high quality design and urban outcome for the location with minimal heritage impacts on the HCA or the adjacent heritage item. The intensification of development along the Church Street corridor will see a significant shift in height of buildings that form the backdrop to the HCA to the west. While there are limited views for most of the HCA in Sorrell Street to that backdrop due to the vegetation and scale of many of the buildings, it is important that development to the west is well-designed and has a relationship to the HCA.

The design, materiality and siting of new built forms are key elements. The height is a secondary consideration given the overall change of context that is taking place.

The concept proposal by Architectus achieves a good heritage and urban outcome for the site and area.”

Importantly, Paul Davies has been instrumental in setting out a series of principles and providing guidance on how to manage the transition from the tall forms west of the site to the HCA east of the site.

Mr Davies notes that the taller approved form at 470 Church Street will exist and the key matters arising are less about the right height for 23-27 Harold Street, but more the opportunity to separate from Currawong House and providing an appropriate built form and materiality response at the level of the heritage item and area.

The planning proposal is not only responsive to these circumstances but represents an exemplar methodology for the mid-block development west of Sorrell St HCA.

More recently Heritage 21 were engaged to make commentary on a modification to the proposal to reduce the proposed height and FSR. Support for the proposal, with respect to heritage, was maintained in this recent analysis.

PLANNING PROPOSAL

The required content of a planning proposal is set out in Section 3.33 of The Environmental Planning and Assessment Act 1979. To assist with the preparation of a planning proposal, the DPE have published the Local Environmental Plan Making Guideline (August 2023) which sets out the form and content that is required within the six parts identified below:

- **Part 1 – Objectives and intended outcomes -**
a statement of the objectives of the proposed instrument
- **Part 2 –Explanation of provisions –**
an explanation of the provisions that are to be included in the proposed instrument
- **Part 3 – Justification of strategic and site specific merit –**
justification of strategic and potential site-specific merit, outcomes, and the process for implementation
- **Part 4 - Maps –**
existing and proposed maps, where relevant, to identify the effect of the planning proposal and the area to which it applies
- **Part 5 – Community consultation –**
details of consultation undertaken with Government agencies, council or other authorities, and community consultation that is to be undertaken on the planning proposal post Gateway and during exhibition
- **Part 6 – Project timeline –**
Project timeline to detail the anticipated timeframe for the LEP making process in accordance with the benchmarks in this guideline.

This Planning Proposal has been prepared in a manner consistent with the LEP Plan Making Guidelines, including the specific matters required to be addressed and also the anticipated timeframe.

PART 1 – OBJECTIVES AND INTENDED OUTCOMES

The objective of the Planning Proposal is to amend Parramatta LEP 2023 to:

To provide suitable building height and floor space ratio, which facilitate the urban renewal of the subject site and provide high-density development commensurate with State Government planning strategies. The Planning Proposal seeks to provide a diversity of new housing within an ideal strategic location.

The objective of the Planning Proposal is consistent with the objectives of the City of Parramatta Council for the broader precinct, as set out in the recently exhibited North East Planning Investigation Area (NEPIA) draft controls. At the same time a draft DCP has been prepared to facilitate an urban design outcome for the precinct. This Planning Proposal is consistent with the draft DCP provisions and it is implicit that the urban design outcomes for this Planning Proposal will be consistent with and subject to the draft DCP controls.

The intended outcome of the planning proposal is to:

- Contribute to the site's role within Parramatta CBD as a strategic centre that provides housing, jobs and services.
- Contribute to increasing housing within proximity to public transport and key amenities including the Prince Alfred Square and Commonwealth Bank Stadium.
- Contribute to the character of the locality by providing a “stepped” height transition between 470 Church Street and the Sorrell Street Heritage Conservation Area and a sensitive treatment at the ground plane that gives greater recognition to the heritage item Currawong House and the HCA.
- Contribute to housing diversity and choice within the City of Parramatta
- Deliver quality housing within the City of Parramatta that is sustainable, and with high amenity values.
- That the urban design outcomes are consistent with that proposed by the City of Parramatta Council for the broader NEPIA precinct and will be implemented through the application of DCP controls, currently in draft form for the precinct. (It is noted that if the making of this planning proposal precedes the finalising and publishing of the draft DCP, a site specific DCP will be prepared that is consistent with the draft DCP.) The NEPIA Draft DCP, prepared by the City of Parramatta Council is appended to the Planning Proposal.

PART 2 – EXPLANATION OF PROVISIONS

Part 2 of the Planning Proposal provides an explanation of the provisions that are to be included within the Planning Proposal. It includes a written explanation that is supported by mapping where relevant.

The stated objectives and intended outcomes at the subject site, the following maps of Parramatta LEP 2023 will be amended:

- Amending the Floor Space Ratio Map for Parramatta LEP 2023 to permit a maximum FSR of 3.6:1.
- Amending the Height of Buildings Map to apply a maximum building height of 40m.
- No Design Excellence provision is to apply to the site.

Detailed urban design analysis and architectural concept testing for the subject site has been conducted and is consistent with the panel and councils recommendations.

Recommended uplift and new planning controls for this site would facilitate opportunities for high quality urban design outcomes and orderly and economic development to support the 30-minute city and local housing demand.

PART 3 – JUSTIFICATION OF STRATEGIC AND SITE-SPECIFIC MERIT

The strategic merit test is demonstrated through a series of established questions set out in turn below.

SECTION A – NEED FOR THE PLANNING PROPOSAL

1. Is the planning proposal a result of an endorsed LSPS, strategic study or report?

YES.

This planning proposal undoubtedly the result of an extensive compendium of strategic planning studies, reports, and endorsed strategies. The site has long been identified as included within the Parramatta CBD and long established as a site where there is strategic merit for a change in planning controls. That the most recent urban design study commissioned by the Department of Planning (the Bennett and Trimble Report) raises questions about the right urban design controls for the site in no way sets aside, irradicates or diminishes the sites established position as having strategic merit for increased density. The location of this site and its renewal as a mixed use and housing precinct is supported by a long list of Strategic Planning documents that include;

- LUHIP for Greater Parramatta – July 2017
- The Greater Sydney Region Plan – March 2018
- Central City District Plan – March 2018
- Greater Parramatta and Olympic Peninsula (GPOP) – October 2018
- Parramatta LSPS – March 2020
- Parramatta CBD Strategy and Planning Proposal (+ numerous supporting studies and reports) – Gateway 2018
- City of Parramatta NEIPA Study and Planning Proposal (2024)

Notwithstanding the established Strategic Merit of the site and the long list of endorsed and current strategic planning documents that identify the site and precinct for planning renewal, the Department of Planning in May 2022 when making the CBD PP chose to exclude land north of Parramatta River from the plan.

It is noted that the subject site has been removed from the CBD PP and identified as Planning Investigation Areas, to enable the Council to determine future planning controls based on a response predominantly to heritage areas east of the subject site,

not due to any doubt about the strategic merit for the subject site being considered as a place to contribute to housing supply for the CBD.

As is it could be mistakenly inferred that the decision of the Department means that land north of Parramatta River is no longer supported for urban renewal, it is appropriate to distil from the Plan Finalisation Report (April 2022) why the Department made the decision it did, and whether that alters the Strategic Merit of the subject site and surrounds. The question arises – “does the decision of the Department invalidate the long established strategic planning analysis and endorsed strategies of both State and Local Government for the site and surrounds?”

The Plan Finalisation Report introductory Overview notes –

“Land north of the Parramatta River and the block located between the Parramatta River and Phillip Street, Wilde Avenue/Smith Street and Charles Street, herby referred to as the Phillip Street Block are recommended to be removed to allow further consideration of the built form outcomes and impacts on heritage, public open space, solar access and amenity.”

And subsequently in the discussion in relation to North Parramatta –

“In response to these concerns the Department recommends the area of land known as Parramatta North not be progressed as part of this plan. This allows further consideration to be given to the provision of development within proximity to the Parramatta Light Rail, transitions, solar access, lower building heights and FSR along the river, consideration of the adjoining HCA and heritage attributes generally, community concerns, amenity, and character. It is noted that Council is currently undertaking a review of planning provisions within the planning investigation areas and this may provide opportunity to review holistically providing a more complete picture of future character and built form transition.”

It is clear in an analysis of this report, and so too from subsequent engagement with the Department of Planning, that the finalisation of the CBD PP does not set aside years of strategic planning analysis and policy making for this part of Parramatta. The strategic merit of the site and surrounds is not dissolved. What is clear is that further work is required on the final form of the planning controls to respond to issues of character and heritage to arrive at planning controls that set the *“future character and built form transition”*. This SSPP embraces that task for the subject site. The methodology set out in this SSPP achieves the intentions of both the State and Local authorities and results in an exemplar for other land in the precinct.

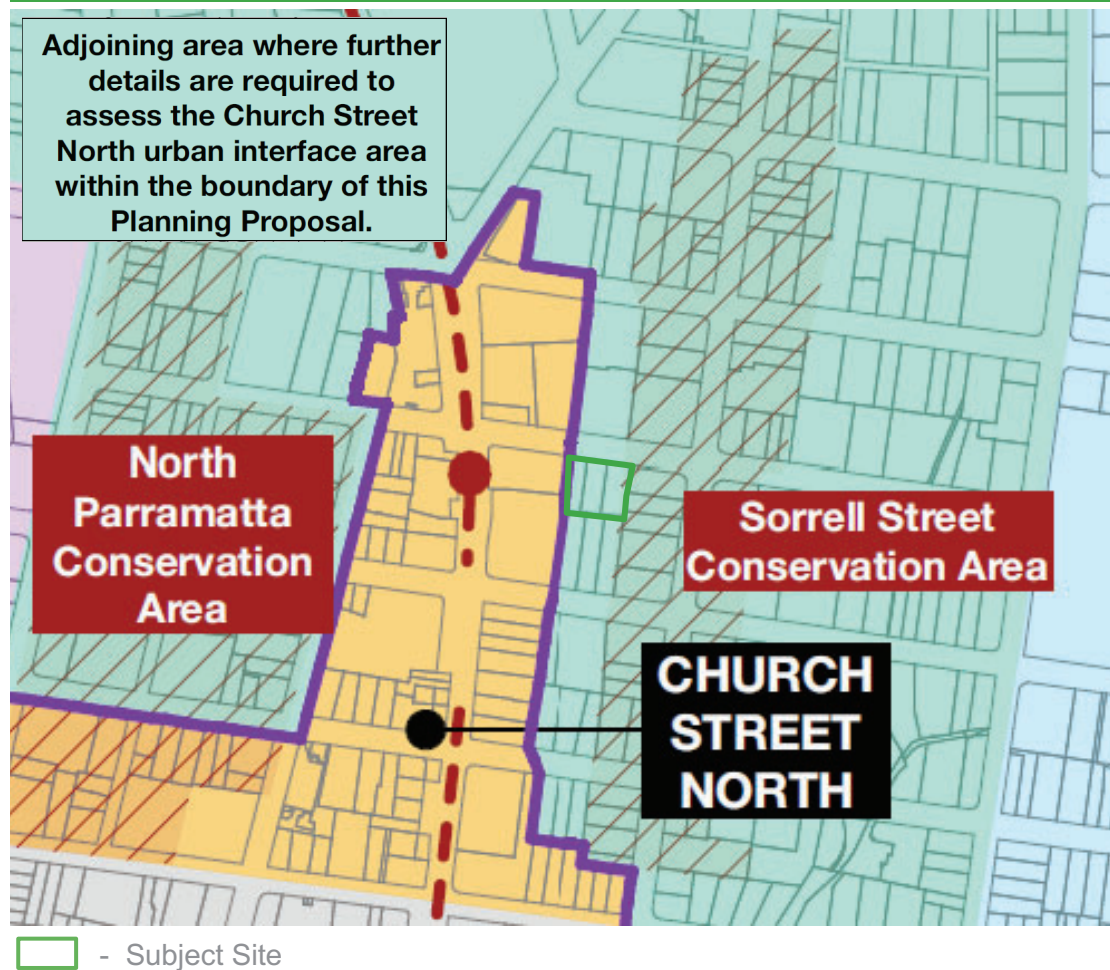
Bennett and Trimble – Independent Urban Design Rapid Assessment

In addition to the above commentary, we note that an Independent Rapid Assessment of the Parramatta CBD Planning Proposal was undertaken by Bennett and Trimble,

which identified the site as an adjoining area where further information is required to assess the appropriate density. This Planning Proposal fills in some of this consideration.

An extract from the rapid assessment is provided below.

Figure 19: Church Street North Urban Interface Area (Bennett and Trimble Report).



The Rapid Assessment Report states that;

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

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



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

As discussed elsewhere in this document, this SSPP provides a well-reasoned urban design and heritage solution that is appropriate for the site and surrounds and becomes an appropriate prototype for the broader area.

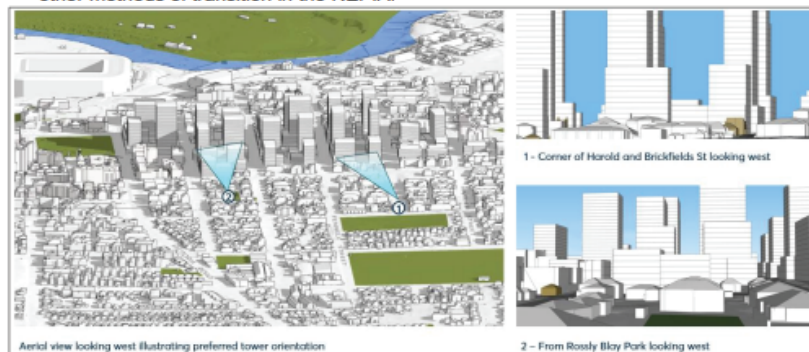
HASSELL URBAN DESIGN REPORT FOR CHURCH STREET NORTH

The planning proposal is consistent with the recommendations from the DPHI lead study in the Church Street North Precinct. As this proposal adopts the same height and FSR and the Council Planning Proposal, the following extract from the Council Report supporting their PP is relevant:

20. The recommended height of building controls for the NEPIA are based on:

- the 'viewshed' approach detailed in the Department-commissioned consultant study that informed mapped building heights in the CSN SEPP. Applying a 60-degree field of view sightline, views to sky are maintained above buildings providing a transition in height and protecting the setting of the heritage conservation area.
- creating a mapped skyline strategy which steps down from the concentrated height on Church Street towards the Sorrell Street HCA, but also northwards towards the surrounding low-scale residential areas of North Parramatta, as per **Figures 5 and 6**.
- an acknowledgement of sites within the CSN Precinct north of Harold Street that are unlikely to redevelop due to large, 6- to 8-storey residential strata subdivisions.

Figure 5: Council officer modelling showing how the stepped height of buildings as well as the inter building separation with views to sky creates the transition between the Church Street North Precinct and the sites within the NEPIA. Note that sites on Church Street North have been modelled to include potential design excellence and place based bonuses. View 1 and 2 are taken from the public domain using 60 degree human view cone and illustrate that when bonuses are applied, the tops of towers can no longer be perceived. This reinforces the importance of combining principles of height transition with other methods of transition in the NEPIA.



Parramatta Local Strategic Planning Statement

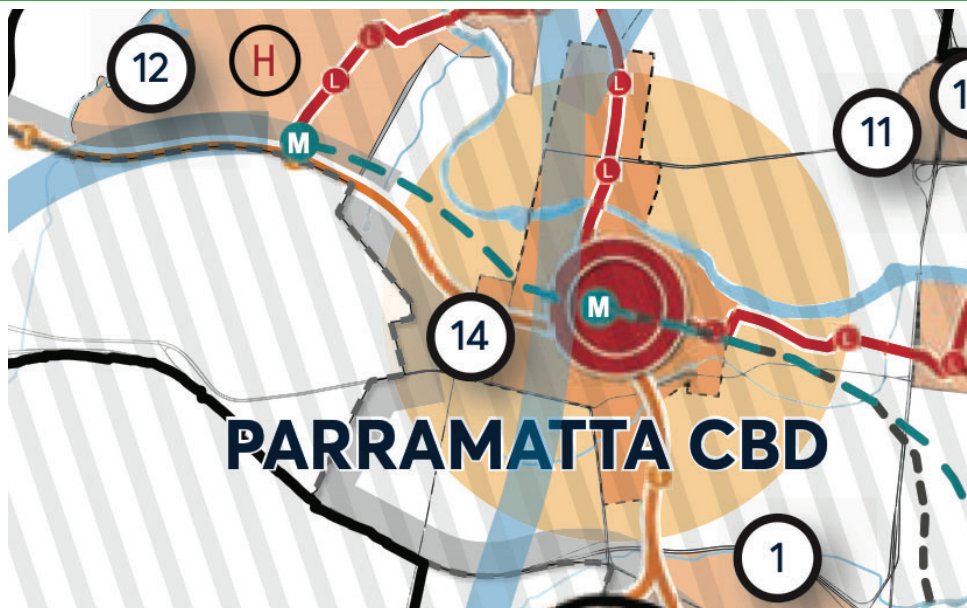
The Parramatta Local Strategic Planning Statement came into effect on 31 March 2020 and this document sets out the 20-year vision for land use planning for the City of Parramatta.

The LSPS contains 16 planning priorities under 4 key themes which are:

- Local planning priorities.
- Liveability planning priorities.
- Productivity planning priorities.
- Sustainability planning priorities

As illustrated in the extract from the LSPS below, the subject site is nominated as being within a "Growth Precinct".

Figure 20: Growth precinct map (City of Parramatta 2020)



Relevant principles are discussed under Section B, Question 3.

Planning Proposal and draft DCP for the land in the North-East Planning Investigation Area (NEPIA)

The City of Parramatta Council has exhibited a Planning Proposal and draft DCP controls for land known as the North-East Planning Investigation Area (NEPIA). The subject site is within the NEPIA (see extract from the draft DCP below).

NORTH-EAST PARRAMATTA PRECINCT

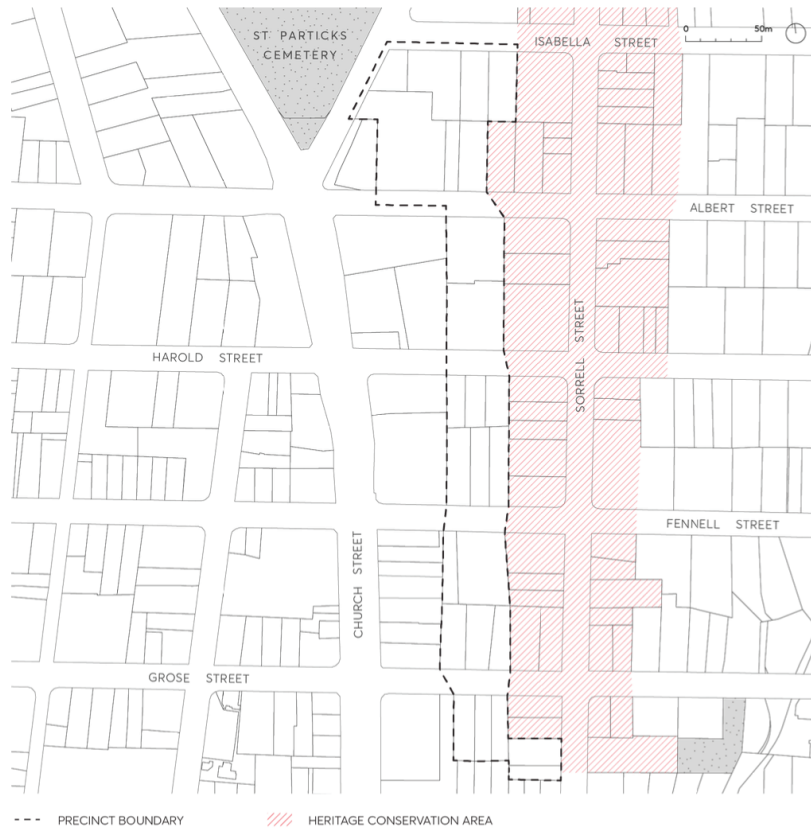


Figure 8.3.10.1 – North-East Parramatta Precinct

While the site specific planning proposal is not the result of the NEPIA planning proposal, it is noted that the planning controls are consistent.

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

YES

It is considered that the Planning Proposal is the best means of achieving the stated objective of urban revitalisation of this land, for a number of reasons.

1. While the Department of Planning and the City of Parramatta Council have not an agreed pathway, milestones or funding mechanism for progressing the studies for North Parramatta a SSPP is entirely appropriate.
2. More specifically, for the subject site there is a long history of planning analysis of the site, previous support for a planning proposal, and a thorough understanding of the site by the City of Parramatta Council.

3. There are no commercial or practical impediments to the redevelopment of the site, and there is adequate information to undertake an assessment and make a proper determination. Accordingly, to delay consideration of a SSPP and await the completion of the NEPIA process is not necessary or equitable. The numerous delays that have occurred in the broader NE precinct, may continue to occur, and are subject to the decisions of the LPP and the Council, which could see further delays to the controls that are most appropriate for the site. The individual Planning Proposal is the best method to proceed.
4. The unique circumstances of the site in relation to the adjoining approval for a building of 80m and 6:1 (+15% bonuses) is also a relevant factor in supporting a site specific planning proposal consideration.

The Planning Proposal is undoubtedly the most efficient mechanism available for stimulating urban renewal and accelerating the delivery of high-density housing in a manner consistent with the strategic directions established in the documents, including A Metropolis of Three Cities – Greater Sydney Region Plan, the Central City District Plan, the Greater Parramatta and Olympic Peninsular Plan, the CBD Planning Proposal and the Parramatta CBD Strategy.

Other options considered include:

- a) Formal submission to a principal LEP

Parramatta LEP 2023 is a recently made principal LEP, with its review at least five years away. This pathway is, accordingly, not open.

- b) Cl.4.6 Variation

The additional height and FSR proposed are not due to the proposal being unable to comply due to site constraints.

This site-specific planning proposal allows the proponent to provide detailed urban design and site-specific investigations to support the requested changes in height and FSR. It will allow for the site to be contemplated in detail, particularly regarding its urban form, response to constraints like flooding, and integration with broader State and local strategic plans and priorities. Accordingly, the planning proposal is the most suitable means of achieving the objectives and intended outcomes for the site.

The Planning Proposal is the most efficient mechanism for stimulating urban renewal and accelerating the delivery of high-density housing.

SECTION B – RELATIONSHIP TO THE STRATEGIC PLANNING FRAMEWORK

3. 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)?

YES

The relevant strategic plans for consideration include the Six Cities Discussion Paper, Metropolis of Three Cities – Greater Sydney Region Plan 2018 and the Central City District Plan 2018.

Six Cities Discussion Paper

Greater Sydney has been divided up into six city regions that together form one city.

In theory, the long term aim is for people and freight to be moved to any part of the region within 90 minutes, therein providing significant lifestyles and economic benefits. Like the Greater Sydney Region Plan, each of the six cities imagines residents accessing jobs within 30 minutes by public transport and more vibrant local centres and neighbourhoods within a 15-minute walk of home. This aims to improve the vibrancy of local areas where all daily needs can be met near home.

Housing theme

A key theme within the discussion paper is the desire for housing to be more affordable and accessible, ideally leveraging transport and social infrastructure. The Discussion Paper notes a lack of housing diversity, which has led to a mismatch between supply and demand for different housing types. A key method to resolve this, highlighted in the discussion paper, is to include a full range of homes from single dwellings, granny flats, dual occupancies and townhouses, low rise through to high rise and larger mixed use developments.

To improve housing diversity, the following actions are relevant to a future planning proposal over the subject site:

- *Increasing the proportion of multi-unit and higher density housing in accessible locations that are supported by infrastructure*
- *ensuring existing and new freestanding homes and medium density housing are connected to quality amenity, essential services and transport infrastructure*

The proposal is consistent with this action and will facilitate more homes that are within a highly accessible location, along with good amenities and supporting services essential for everyday living. It is further noted that future City Plans may require areas

within 800m of a transport hub to have a minimum 25% proportion of the LGA housing target delivered through a mix of higher density housing types. This Planning Proposal will assist the City of Parramatta in achieving this objective.

Inclusive places linked to infrastructure

This draft action essentially seeks to ensure that people can 'live local', with one of the methods being to link higher density housing around transport nodes where there are better active transport opportunities, along with the possibility for people to access services and amenities without leaving the area.

The proposal offers the City of Parramatta the opportunity to be consistent with this theme and realise the benefits offered for future residents.

The DPE Gateway determination report makes the following commentary under the heading "Strategic Merit Test," and it is particularly noted that the comment is about all land under consideration

The site is within the Central City District and the former Greater Sydney Commission (GSC) released the Central City District Plan on 18 March 2018.

The District Plan commits to additional housing supply with access to jobs and services (Planning Priority C5) through a 21,650 five-year housing supply target for the Parramatta LGA, but this housing growth is intended to be supported by liveability, productivity and sustainability outcomes. The structure plan for the Central City District demonstrates that Greater Parramatta is the metropolitan centre of the Central City District.

The planning proposal seeks to deliver the vision of the Central River City through additional jobs and dwellings. The draft LEP seeks to balance this growth with the liveability and other priorities within the Plan.

The Department is satisfied that the draft LEP gives effect to the District Plan in accordance with section 3.8 of the EPA Act.

Metropolis of Three Cities

The Planning Proposal is aligned with these key themes, directions, metrics and objectives:

1. **Infrastructure and collaboration.** The subject land is located within Parramatta CBD. The site has easy access to existing health services infrastructure and schools. The Parramatta CBD benefits from existing heavy rail and bus transport services. Parramatta Light Rail (expected to start operation Mid 2024), and the Metro Rail is currently under construction.

2. **Liveability.** The architectural concepts provided with this Planning Proposal and the relevant urban design analysis show that liveability for future residents is a primary consideration. Proximity to Parramatta River, employment, transport, and retail are significant features of the site. Additional considerations contributing to liveability, such as views, are implicit in the proposal.
3. **Productivity.** The proposal capitalises on the existing Parramatta CBD and will provide a part in contributing to sustainable future growth.
4. **Sustainability.** The Planning Proposal facilitates building capacity based on existing and committed infrastructure. This seeks to shape a strong and connected community.

The table below provides a summary of relevant priorities.

DIRECTION	STRATEGIC ALIGNMENT
Infrastructure and collaboration	
1. A city supported by infrastructure	<p>The subject site is located within the Parramatta City Centre. The city Centre has a myriad of social and public transport infrastructure including heavy rail and bus services, with a metro and light rail also under construction. Along with great active transport links for pedestrians and cyclists alike, the subject site is highly accessible and supports the 15 minute city and 30 minute city ideals.</p> <p>Consolidating a population around an existing Metropolitan Centre supports the existing infrastructure within these areas, including its efficient use, leading to more sustainable and better functioning cities and places.</p>
Liveability	
3. A city for people	<p>An indicator of the success of this direction is whether there has been an increase in the number of people who can walk to local centres. The Planning Proposal achieves consistency with this direction by increasing the population within close proximity to the Parramatta metropolitan centre, including the community, social, and employment benefits it offers.</p>
4. Housing the city	<p>The planning proposal will assist the City of Parramatta in achieving its housing targets, in addition to providing living opportunities close to employment, public transport, active transport opportunities and other services that are essential for socially vibrant and cohesive communities. This increases housing diversity across the City of Parramatta within an highly accessible and desirable location.</p>
5. A city of great places	<p>The planning proposal will enhance accessibility to local open space and other areas by active transport modes. This makes efficient use of infrastructure and improves the equitability of the city. The proposal will also ensure public domain upgrades especially to the</p>

DIRECTION	STRATEGIC ALIGNMENT
	<p>Parramatta River foreshore frontage, improving the use of public assets.</p> <p>The planning proposal is wholly consistent with Council's draft DCP and site specific provisions that have been prepared based on the same height and FSR proposed in this Planning Proposal. This ensures that there is appropriate controls to ensure that the character and amenity of nearby places, including heritage items is protected.</p>
Productivity	
6. A well connected city	<p>A well connected city seeks to ensure that homes are within 30 minutes by public transport to a metropolitan centre or strategic centre. The subject site is highly accessible to a diverse range of centres, including the Parramatta City Centre. With the introduction of the metro, the subject site will be within 30 minutes of the Sydney CBD.</p> <p>The site is within walking distance to the Parramatta Light Rail, which is due to open in the second half of 2024, further enhancing its accessibility, which will be further strengthened when Stage 2 is completed. In the short term however the light rail enhances connectivity to important local precincts like the Westmead Health and Education Precinct along with the Parramatta City Centre, WSU and Carlingford.</p> <p>The planning proposal therefore is consistent with this direction.</p>
Sustainability	
8. A city in its landscape	<p>Future development of the site can make a positive contribution to urban greening, including the enhancement of local canopy cover. This will provide local cooling benefits, in addition to supporting local biodiversity values. Together, this results in a much more liveable community, with exceptional amenity values.</p>
9. An efficient city	<p>The site is within walking distance of bus, and train services. Likewise, it is within walking distance of the soon to commence light rail and the metro which is currently under construction. This accessibility to transport, jobs and services means that efficiency is increased. Furthermore, as investment in public transport infrastructure continues, public transport use is expected to grow which reduces reliance on private vehicles.</p> <p>Likewise, the proximity to the Parramatta City Centre ensures that people do not need to drive, which contributes to a reduction in greenhouse gases.</p>

Central City District Plan

The Central City District Plan sets out the priorities and actions for this District, structured around the same key themes as presented in the Greater Sydney Region Plan. As relevant to the subject site, the District Plan continually emphasises the importance of growth within strategic centres regarding jobs and housing. The Planning Proposal seeks to deliver additional housing and jobs within a 30-minute city scenario.

The Planning Proposal seeks to deliver housing and employment to the market quickly and in a highly liveable and accessible and central location.

The table below addresses relevant priorities of the District Plan.

PLANNING PRIORITY	STRATEGIC ALIGNMENT
Infrastructure and collaboration	
1. Planning for a city supported by infrastructure	<p>This priority area seeks to ensure that the city maximises its efficient use of existing and planned infrastructure. In doing so, it aims to ensure that residents have the facilities and services to lead productive and healthy lives. Importantly, this includes being within 30 minutes of the nearest strategic centre by public transport, including the Parramatta Light Rail. .</p> <p>The Planning Proposal facilitates this priority by consolidating growth within the Parramatta Metropolitan Centre. This ensures that all residents, regardless of age or ability can access services within the City Centre, open spaces and public transport comfortably.</p>
Liveability	
3. Providing services and social infrastructure to meet people's changing needs	The planning proposal facilitates this priority by providing housing within an area that is well suited for expanded social infrastructure. Furthermore, the site is located within proximity to Parramatta City Centre, ensuring that people regardless of age or ability can access the necessary services efficiently, thereby contributing to improved liveability.
4. Fostering healthy, creative, culturally rich and socially connected communities	The proposal seeks to increase the density of housing within proximity to Parramatta City Centre. This expands the range of housing choices, opening up greater opportunities for a greater diversity of people to live within the City of Parramatta. Likewise, being located within walking distance to a diversity of public transport services ensures that future residents are connected to other destinations, ensuring that social connectivity outside of the local area is achieved.
5. Providing housing supply, choice and affordability with access to jobs, services and public transport	The proposal increases housing supply within proximity to Parramatta City Centre providing local jobs, services and entertainment offerings. In addition, the proposal also enhances public transport use through providing more people within a highly accessible location. It is noted that the subject site has bus, and train services to key destinations including the Sydney CBD, Castle Hill, Rouse Hill, Blacktown, Epping

PLANNING PRIORITY	STRATEGIC ALIGNMENT
6. Creating and renewing great places and local centres, and respecting the District's heritage	<p>and more. Accessibility will be further enhanced with the operation of the light rail, in addition to the metro which is currently under construction.</p> <p>The proposal contributes to the renewal of the north east part of the parramatta CBD. As shown within the attached urban design study, the proposal has applied a place making approach and respects heritage values.</p>
Productivity	
7. Growing a stronger and more competitive Greater Parramatta	This priority is more focused on economic outcomes. The proposal however assist in facilitating its implementation by increasing the possibility of people to live and work within the same area.
8. Delivering a more connected and competitive GPOP Economic Corridor	The proposal puts housing close to public transport, fostering local economic opportunities within North Parramatta, along with providing more homes close to local employment opportunities accessible via the light rail and buses.
9. Delivering integrated land use and transport planning and a 30-minute city	The Planning Proposal facilitates this priority by consolidating growth on land within proximity to Parramatta City Centre.
10. Growing investment, business opportunities and jobs in strategic centres	The planning proposal increases the population within close proximity to the Parramatta Metropolitan Centre. This contributes to activity within the centre and therefore supports its ongoing and long term viability. A ground level active frontage is provided which facilitates more local business opportunities within the City Centre.
Sustainability	
13. Protecting and improving the health and enjoyment of the District's waterways	Future development of the site will include necessary measures to ensure that the water is appropriately treated, including meeting all pollution reduction targets. This will ensure that waterways that are far beyond the site are not impacted by the site's future development.
16. Increasing urban tree canopy cover and delivering Green Grid connections	A future development application will provide additional canopy cover and urban greening. This will enhance cooling of the local environment, in addition to providing valuable habitat which enhances overall biodiversity in the area.
17. Delivering high quality open space	A future Development Application can assist with the delivery of Council's vision for public spaces within North Parramatta.

In summary, this Planning Proposal seeks to deliver on the vision set forward in the Central City District Plan by:

1. Increasing diversity of housing choice.
2. Delivering housing to meet strategic housing supply targets.
3. Increasing housing within 30 minutes of both Parramatta CBD and Sydney CBD.
4. Contribution to energy efficiency through aims to deliver a development that meets environmental performance criteria.
5. Reduced emissions through both building environmental performance and reducing reliance on private vehicle travel. Focusing increased housing on the subject site which is highly accessible to local ferries, bus and train services means that future residents are more likely to walk, cycle and use integrated public transport systems.
6. Enhancing the role of Parramatta as the economic anchor with the vision to deliver both jobs and housing.

The objectives of the Planning Proposal are incontestably aligned with the documented priorities for the Central City District.

4. Is the planning proposal consistent with a council LSPS that has been endorsed by the Planning Secretary or GCC, or another endorsed local strategy or strategic plan?

North-East Planning Investigation Area (PP-2024-1285)

The subject site at 23-27 Harold Street is part of council's North East Planning Investigation Area (NEPIA). Council's NEPIA Planning proposal identifies the importance of providing increased density and housing within the North-Eastern Part of Parramatta CBD and introduced increased height and density controls. This planning proposal is consistent with Council's NEPIA Planning proposal's nominated controls and therefore is consistent with Council's vision of the locality.

It is noted that Council have send its planning proposal to the DPHI for a Gateway Determination, with this under assessment at the time of this report.

Parramatta Local Strategic Planning Statement

The Parramatta Local Strategic Planning Statement came into effect on 31 March 2020 and this document sets out the 20-year vision for land use planning for the City of Parramatta. The LSPS contains 16 planning priorities under 4 key themes which are:

- Local planning priorities.
- Liveability planning priorities.
- Productivity planning priorities.
- Sustainability planning priorities

The planning principles relevant to the proposal are addressed below.

LOCAL STRATEIC PLANNING STATEMENT	
VISION	STRATEGIC ALIGNMENT
<i>In 20 years Parramatta will be a bustling, cosmopolitan and vibrant metropolis, the Central City for Greater Sydney. It will be a Smart City that is well connected to the region, surrounded by high quality and diverse residential neighbourhoods with lots of parks and green spaces. It will be innovative and creative and be well supported by strong, productive and competitive employment precincts. It will be a place that people will want to be a part of.</i>	The subject site is within Parramatta CBD with access to numerous public transport modes including, heavy rail, bus services and the near completed light rail as well as the new Metro line currently under construction. Additionally, the proposal will enable additional people to reside within walking distance to several parks. The proposed development will assist in creating a well-supported, competitive employment precinct, especially given its location and will be a place where people would want to be part of.
LOCAL PLANNING PRIORITIES	
PLANNING PRIORITY	STRATEGIC ALIGNMENT
Local	
1. Expand Parramatta's economic role as the Central City of Greater Sydney	The subject site is within close proximity to Parramatta City Centre. It will provide additional housing and employment floor space at street level. This will contribute to the strengthening of the Parramatta City Centre by providing jobs and also housing within a highly accessible area.
2. Grow Parramatta as a Smart City	A future development application can incorporate smart technology to improve liveability and sustainability.

3. Advocate for improved public transport connectivity to Parramatta CBD from the surrounding district	The site is close to significant public transport infrastructure including bus, and train services. Likewise, the light rail which will commence in 2024 is within walking distance, as is the Metro which is currently under construction. This high level of public transport accessibility provides future residents and workers with exceptional transport opportunities and connections.
4. Focus housing and employment growth in the GPOP and Strategic Centres; as well as stage housing release consistent with the Parramatta Local Housing Strategy	The subject site is a Phase 1 area of the GPOP.
5. Support and enhance the low- scale character and identity of suburban Parramatta outside of the GPOP area and Epping Strategic Centre	The subject site is a Phase 1 area of the GPOP.
6. Provide for community infrastructure and recreation opportunities	The proposal provides the opportunity for new pedestrian connections and accessible open space areas for residents and the general community alike.
Liveability	
7. Provide for a diversity of housing types and sizes to meet community needs into the future	The proposal will result in about 65 dwellings, with a mix of studio, 1, 2 and 3 bedroom apartments. This will contribute to the diversity of housing available in the LGA.
8. Incentivise affordable rental housing delivery and provide for permanent affordable housing	The proposal includes a diverse mix of units that can contribute to the range of housing available, therefore increasing affordable options.
9. Enhance Parramatta's heritage and cultural assets to maintain our authentic identity and deliver infrastructure to meet community needs	The subject site adjoins a heritage item to the west. The future proposed built form will be designed to respond to the heritage items and will not cause adverse impacts.
10. Improve active walking and cycling infrastructure and	The subject site is close to bus, and train services that are accessible by walking. Likewise, the site is within walking distance to the Parramatta Light Rail. The proposal shows that a through site link is

access to public and shared transport	possible which expands the local active transport network. In addition, the site is very close to the existing active transport network in Parramatta, including cycleways.
Productivity	
11. Build the capacity of the Parramatta CBD, Strategic Centres, and Employment Lands to be strong, competitive and productive	The subject site is within the Parramatta City Centre. It will provide additional housing and employment floor space at street level. This will contribute to the strengthening of the Parramatta City Centre by providing jobs and also housing within a highly accessible area.
12. Retain and enhance Local Urban Service Hubs for small industries, local services and last-mile freight and logistics	Not relevant
Sustainability	
13. Protect and improve the health and swimmability of the Parramatta River, its waterways and catchment	The concept plan includes generous areas of deep soil and landscaping.
14. Protect and enhance our trees and green infrastructure to improve liveability and ecological health	The concept plan includes generous areas of deep soil and landscaping.
15. Reduce emissions and manage energy, water, and waste efficiently to create better buildings and precincts and solve city planning challenges	This can be actioned in a future development application.
16. Increase resilience of people and infrastructure against natural and urban hazards	This can be addressed in a future development application. More sustainably designed buildings will provide protection against climatic extremes.

Parramatta Local Housing Strategy

The Local Housing Strategy provides guidance regarding future housing growth in the Parramatta LGA. It supports the LSPS and other priorities in the Greater Sydney Region Plan and the Central City District Plan.

As per the findings of the Parramatta Local Housing Strategy, by 2036, the population of the City of Parramatta LGA is anticipated by over 175,000 people to a total of over 416,000 people and is expected to need an additional 77,000 dwellings to accommodate this population growth.

The LHS notes that the investigation outcomes indicate that the population is likely to increase even more substantially. Furthermore, seniors and elderly are expected to grow by 34,317 or 64%. As a result, the LHS identified that the future housing supply will need to accommodate older and less able residents such as seniors and elderly residents.

The subject site is closer to the Parramatta CBD and is well separated from heritage values further to the north, where there are relatively intact heritage conservation areas. The relationship with the CBD, in addition to the surrounding context more broadly is suitable for uplift as shown in the attached urban design concept plans. It is noted that these controls are substantially the same as those put forward by the City of Parramatta in their planning proposal that included the subject site.

OBJECTIVES	JUSTIFICATION
Liveability	
1. Community infrastructure is adequately funded and delivered in alignment with homes	This planning proposal assists the City of Parramatta in achieving its modal shift from private vehicles to public and active transport modes.
2. Housing delivery is aligned and sequenced with existing transport and capacity improvements	This planning proposal assists the City of Parramatta in achieving the majority of new housing within walking catchments of public and active transport modes.
3. Funding is secured through State and robust local contributions frameworks	A future development application will make appropriate development contributions.
4. Growth precincts innovate excellence in	The proposal will provide for a diversity of housing that meets the needs of people, regardless of age or ability. It will provide an appropriate mix of dwellings, including adaptable housing.

OBJECTIVES	JUSTIFICATION
placed-based outcomes with diverse and affordable housing to suit residents' needs	Furthermore, the yield and mix of dwellings can assist affordability by providing a range of homes at various price points.
5. Parramatta's low density residential neighbourhoods to retain local character, provide housing diversity and preserve future housing opportunity	The urban design study submitted within this Planning Proposal confirms that there is no impact on surrounding areas.
Productivity	
1. Housing delivery complements, not compromises, the economic significance of both the Central City and the City of Parramatta	The planning proposal provides ground level employment as originally envisioned by Council.
2. Additional housing is focused on growth precincts, aligned with transport infrastructure delivery to facilitate residents' access to facilities, services, social connections and jobs	This planning proposal assists the City of Parramatta in achieving the majority of new housing within walking catchments of public and active transport modes.
3. Housing delivery is efficiently sequenced to best use State and local resources and investments	The planning proposal supports this objective.
4. Commercial opportunities are enhanced in conjunction with	The planning proposal supports ground level employment to activate the public domain.

OBJECTIVES	JUSTIFICATION
<p>growth precinct delivery</p> <p>5. Housing supports the key essential services in the City of Parramatta through striving for housing affordability</p>	<p>The planning proposal facilitates additional housing supply which supports the services offered in the Parramatta City Centre, in addition to providing a diversity of housing for different price points in the market. Additional supply may also contribute to meeting market demand for housing, thereby potentially contributing to improved affordability.</p>
Sustainability	
<p>1. Advocating for the wholesale improvement of residential built form performance improvement through State frameworks and utilities provision</p>	<p>Future development can comply with relevant sustainability initiatives in the Sustainable Buildings SEPP 2022.</p>
<p>2. Pioneering local mechanisms to improve built form environmental performance and reduce urban heat impacts</p>	<p>Future development can comply with relevant sustainability initiatives in the Sustainable Buildings SEPP 2022.</p>
<p>3. Protect the local character of low density residential neighbourhoods and optimise their environmental performance to benefit the whole of City of Parramatta</p>	<p>The urban design study submitted within this Planning Proposal confirms that there is no impact on surrounding areas.</p>

5. Is the planning proposal consistent with any other applicable State and regional studies or strategies?

YES

The investment in new infrastructure is exceptional in Parramatta CBD with the construction of Parramatta Light Rail, the construction commencing on Sydney Metro,

and the attention to pedestrian and cycling facilities, routes, and experiences in the CBD.

Parramatta CBD is also undergoing a radical change in the intensity of employment and housing within the CBD, as facilitated and encouraged by State and Local planning initiatives.

The Planning Proposal is consistent with the changing planning circumstances and elevation of Parramatta CBD within the Sydney metropolitan area, and the resulting change in planning controls within the city centre. In addition to the above, the proposal is also consistent with the strategies identified below.

Document	Discussion
Future Transport Strategy 2056	<p>The Future Transport Strategy sets the direction of the NSW Government to improve the transport system across the State. It intends to make decisions by putting people and places at the centre to ensure that customers, the community and the economy experience maximum benefits.</p> <p>The planning proposal over the subject site is consistent with key strategic directions within the strategy, including:</p> <ul style="list-style-type: none"> – C1.1 Enhance 30-minute metropolitan cities – C2.1 Support car-free, active, sustainable transport options – C3.1 Provide transport choices for people no matter where they live – P1.2 Support growth around public transport – P2.1 Support thriving and healthy 15-minute neighbourhoods
Staying Ahead: State Infrastructure Strategy 2022 – 2042	<p>The State Infrastructure Strategy provides a 20-year plan for the NSW Government for strategic investment decisions. The strategy aims to provide recommendations that aid the growth and productivity of the State to improve living standards for the community.</p> <p>Chapter 4 Service Growing Communities, is relevant to this Planning Proposal. Key Strategic directions include:</p> <ul style="list-style-type: none"> – <i>Deliver housing in great neighbourhoods for all parts of the community</i> – <i>Improve access to efficient, quality services through better use of assets and a better mix of physical infrastructure and technology-enabled solutions</i> <p>The proposal satisfies the above strategic directions by providing housing within a highly accessible location, within Parramatta CBD,</p>

Document	Discussion
	and within a location previously identified by Council as suitable for higher-density housing.
Housing Strategy 2041	<p>This strategy establishes the 20 year housing vision for NSW and aims to provide the framework for greater housing supply, improved affordability of housing, along with housing diversity and resilience. There are four pillars of housing supply in the strategy, with the diagram reproduced below:</p>  <p>The diagram illustrates the four pillars of housing supply. It consists of four colored boxes arranged in a 2x2 grid, each with a corresponding icon in a circle. The top-left box is blue and titled 'SUPPLY', featuring a bar chart icon. The top-right box is purple and titled 'DIVERSITY', featuring a compass icon. The bottom-left box is green and titled 'AFFORDABILITY', featuring a handshake icon. The bottom-right box is orange and titled 'RESILIENCE', featuring a circular flow icon. Each box contains a brief description of the pillar's focus.</p> <p>The Planning Proposal is consistent with these pillars.</p>
Net Zero Plan	<p>The Net Zero Plan outlines the NSW Government's plan to grow the economy, creating jobs and reducing emissions over the next decade.</p> <p>A future Development Application will be subject to the provisions within the Sustainable Buildings SEPP 2022, which comes into effect on 1 October 2023. This SEPP will ensure that development over the subject site is sustainable and resilient, making a valuable contribution to NSW being a net zero emitter.</p>

SITE SPECIFIC MERIT

The simpler test for this planning proposal is the “strategic merit test”. The sites location in Parramatta CBD, the sites long held identification for redevelopment, the proximity to the CBD core, the excellent provision of public transport (notably the Light Rail), the sites proximity to the Westmead Health and Education Precinct, the established built form both north and south of the site of residential towers completed and proposed (all north of Parramatta River) and many other factors all confirm that the site is in no way without strategic merit.

The more demanding and relevant questions for the subject site is what is the right built form? What is the site specific merit? How does this site respond to the built form approved and existing west of the site along the Church Street corridor, and also respond to the heritage conversation area character east of the site.

This site specific planning proposal carefully considers this and includes a response that is of site specific merit. And helpfully provides an exemplar or model for other land in a similar mid block circumstance.

In resolving the proposed FSR and Height for the subject site the planning proposal has given consideration to –

- Relevant heritage principles;
- Appropriate height and FSR transition controls;
- Incorporation of a heritage site into the proposal to embed its ongoing protection as part of the planning proposal and be directly responsible for implementing heritage benefits; and
- The appropriate footprint and also the design of the tower form within the site to ensure that it is appropriate for the site, relates to adjoining sites, and becomes an prototype for other land parcels with similar features.

Heritage Principles Guiding Built Form Outcomes

Paul Davies heritage architects has guided the SSPP with respect to the way in which the subject site can respond to the circumstances of the site, with particular regard to the Sorrell St Heritage Conservation Area and the heritage items proximate to the site.

Following an analysis of the HCA and Heritage Items, relevant to the site, the report gives consideration to what form and scale of buildings can be designed on the subject land. Three principal approaches are summarised as =

- Maintain low scale development
- Use transitional or stepped forms of development

- Introduce larger scale and form

The key principles and guiding advice includes –

Setbacks and Creation of setting and public space

Ensuring that good setbacks to heritage elements or precincts is achieved is a key design element. In this case, with the heritage item forming part of the site there is the ability to use the rear former garden area of the heritage item in combination with a side setback on the site of the development to create a significant landscaped garden space that can include elements such as the major tree and parts of the early brick wall to create scale and form fronting the new building and the rear of the heritage item and address Harold Street. The setbacks in the earlier Cox proposal are well resolved and achieve a good heritage and urban outcome.

This provides a substantial public benefit and the opportunity to design a subtle and landscaped based interface between new and old.

Form of the building

Designing a larger built element in the proximity of heritage buildings requires a different design approach to the often-cited model of podium and tower. While the podium form can work in some situations to reduce apparent scale, particularly if a building is built to a street edge, a more sophisticated and refined form is to design new buildings so that the form is grounded and simplified in massing. This is more characteristic of how heritage buildings are designed and grounded, including large buildings.

Excellent examples of this are early warehouse buildings, often of 8-10 storeys that use well- balanced facade and envelope design and shifting scale over the height of the building to create good urban form. While some of these buildings add detail, new design can provide similar techniques to manage form and apparent scale.

Height

There are several approaches to managing height in relation to changing contexts of height such as this site. If a built form is to exceed the heights of adjoining (in this case heritage) buildings, the height can either be nominally different or significantly different. There is a height at which the character of the site changes from low scale to high scale and the actual number of floors plays relatively little part in achieving good design or impacts the visual setting.

By way of example a development of say four storeys could be argued as consistent with the scale of the apartment buildings in the vicinity that

characterise the area. They are not desirable forms but they set a current height framework. A building of say six or seven storeys changes the height framework even though not much higher than the apartment buildings. It could be considered a transitional height but the height change is significant. A height above six storeys, assuming that all of these scenarios are well-designed, does not necessarily significantly change the visual impact or setting. Once a built form moves beyond the scale of three or four storeys it assumes a different relationship in the urban form of the area and while there is a difference between say 10 or 15 storeys, the impact on the immediate areas around it are not affected by the actual height but by the quality of the building, its setbacks, design, etc.

A built form in the vicinity of eighteen storeys that is appropriately designed and sited will not have an adverse impact on the heritage item or HCA provided it is designed to form a backdrop building.

Building orientation

While the subject site is not a corner site, a new building will need to address both Harold Street and the HCA with principal facades. A larger than usual setback from the east boundary will assist with this as will the combination of the three lots in Harold Street with the site of the heritage item. Ideally a built form would be an 'in-the-round' design with all facades as designed facades avoiding the commonly used blank side walls that may or may not be built against in the future.

Materiality and facade design

The materiality and facade form then becomes a critical element to allow the built form to be seen as a building in its own right but also a backdrop building. Good design can involve facade articulation and break up, use of solid and void, limits on glazing and generally not using curtain wall systems, avoiding highly reflective materials and facades, designing the building in the round without bare blank walls, creating an activated ground plane, perhaps of greater scale but which interacts with human scale, landscape and civic form.

There are no set materials but the use of curtain walls, extensive pre-cast panels, highly modular forms and blank and plain materials would not be appropriate for the site

The above guiding principles have led to the proposed built form and the consequential planning controls sought in the Planning Proposal.

The Planning Proposal seeks to:

- Amend the Height of Building Map for Parramatta LEP 2023 to permit development with a maximum building height of 40m.
- Amend the Floor Space Ratio Map for Parramatta LEP 2023 to permit a maximum FSR of 3.6:1.

A clear rationale has been developed for the appropriate built form and density for the site, that responds to the circumstances of adjoining land. The proposal demonstrates Site Specific Merit.

6. Is the planning proposal consistent with applicable SEPPs?

The following table briefly assesses consistency against each State Environmental Planning Policy (SEPP) relevant to the planning proposal.

Consideration of relevant SEPPs	Comment
State Environmental Planning Policy (Biodiversity and Conservation) 2021	Consistent. The site is not identified as a Koala habitat and contains no significant vegetation.
State Environmental Planning Policy (Sustainable Buildings) 2022	The planning proposal is consistent with the aims or provisions of this SEPP. Future development will be subject to the provisions of this SEPP.
State Environmental Planning Policy (Exempt and Complying Development Codes) 2008	Not applicable
State Environmental Planning Policy (Housing) 2021	The proposal is consistent with the intent of the Housing SEPP. Future development under the SEPP remains permissible, though rezoning of the site may expand opportunities for a greater diversity and type of housing. An urban design study submitted with this planning proposal includes an indicative development concept. This concept shows that the site can be developed consistent with the ADG requirements.
State Environmental Planning Policy (Industry and Employment) 2021	Not applicable

State Environmental Planning Policy (Planning Systems) 2021	Not applicable
State Environmental Planning Policy (Precincts—Central River City) 2021	Not applicable
State Environmental Planning Policy (Precincts—Eastern Harbour City) 2021	Not applicable
State Environmental Planning Policy (Precincts—Regional) 2021	Not applicable
State Environmental Planning Policy (Precincts—Western Parkland City) 2021	Not applicable
State Environmental Planning Policy (Primary Production) 2021	Not applicable
SEPP (Resilience and Hazards) 2021	<p>Consistent with the existing uses of the site include residential development which are unlikely to result in contamination of the land. The planning proposal is consistent with the aims and provisions of this SEPP.</p> <ul style="list-style-type: none"> – In any case, future redevelopment of the site will need to address the requirements of the SEPP. The proposal is consistent with the provision of this SEPP. – This is being addressed through the current development application process over the subject site, noting that this proposal only relates to <i>increasing</i> the height and FSR.
State Environmental Planning Policy (Resources and Energy) 2021	Not applicable
SEPP (Transport and Infrastructure) 2021	<p>Consistent</p> <p>Future development may constitute traffic-generating development and trigger an assessment under this SEPP.</p>

7. Is the planning proposal consistent with applicable Ministerial Directions (section 9.1 Directions) or key government priority?

The following table provides a brief assessment of consistency against each s.9.1 directions that are relevant to the Planning Proposal.

Ministerial Directions	Consistency	Comments
Focus Area 1: Planning Systems		
1.1 Implementation of Regional Plans	Yes	<p>This proposal is consistent with the objectives and strategies of A Metropolis of Three Cities as outlined in the Planning Proposal report. Refer to Part 3 – Justification of this report, Section B – Relationship to Strategic Planning Framework of the Planning Proposal for an explanation of the consistency of the Planning Proposal.</p> <p>The planning proposal achieves the overall intent of the Plan and seeks to implement the achievement of its vision, land use strategy, policies, outcomes or actions.</p> <p>This planning proposal seeks to facilitate the development of these key parcels of land within the Parramatta CBD which will encourage economic investment in this strategic centre and employment.</p>
1.2 Development of Aboriginal Land Council Land	N/A	Aboriginal and archaeological investigations will be completed as part of the future detailed design and development application documentation.
1.3 Approval and Referral Requirements	N/A	The Planning Proposal does not introduce any provisions that require any additional concurrence, consultation or referral.
1.4 Site Specific Provisions	Yes	The planning proposal relates to building height and floor space ratio provisions. This planning proposal does not impose any development standards or requirements in addition to those already contained in the principal environmental planning instrument being amended.
1.4A Exclusion of Development Standards from Variation	N/A	This planning proposal does not exclude any development standards under Clause 4.6.
Focus Area 1: Planning Systems – Place-based		
1.5 Parramatta Road Corridor Urban Transformation Strategy	N/A	Not relevant to the subject planning proposal.

Ministerial Directions	Consistency	Comments
1.6 Implementation of North West Priority Growth Area Land Use and Infrastructure Implementation Plan	N/A	Not relevant to the subject planning proposal.
1.7 Implementation of Greater Parramatta Priority Growth Area Interim Land Use and Infrastructure Implementation Plan	N/A	Not relevant to the subject planning proposal.
1.8 Implementation of Wilton Priority Growth Area Interim Land Use and Infrastructure Implementation Plan	N/A	Not relevant to the subject planning proposal.
1.9 Implementation of Glenfield to Macarthur Urban Renewal Corridor .	N/A	Not relevant to the subject planning proposal.
1.10 Implementation of the Western Sydney Aerotropolis Plan	N/A	Not relevant to the subject planning proposal.
1.11 Implementation of Bayside West Precincts 2036 Plan	N/A	Not relevant to the subject planning proposal.
1.12 Implementation of Planning Principles for the Cooks Cove Precinct	N/A	Not relevant to the subject planning proposal.
1.13 Implementation of St Leonards and Crows Nest 2036 Plan	N/A	Not relevant to the subject planning proposal.
1.14 Implementation of Greater Macarthur 2040	N/A	Not relevant to the subject planning proposal.
1.15 Implementation of the Pyrmont Peninsula Place Strategy	N/A	Not relevant to the subject planning proposal.
1.16 North West Rail Link Corridor Strategy	N/A	Not relevant to the subject planning proposal.

Ministerial Directions	Consistency	Comments
1.17 Implementation of the Bays West Place Strategy	N/A	Not relevant to the subject planning proposal.
1.18 Implementation of the Macquarie Park Innovation Precinct	N/A	Not relevant to the subject planning proposal.
1.19 Implementation of the Westmead Place Strategy	N/A	Not relevant to the subject planning proposal.
1.20 Implementation of the Camellia-Rosehill Place Strategy	N/A	Not relevant to the subject planning proposal.
1.21 Implementation of South West Growth Area Structure Plan	N/A	Not relevant to the subject planning proposal.
1.22 Implementation of the Cherrybrook Station Place Strategy	N/A	Not relevant to the subject planning proposal.
Focus Area 2: Design and Place	N/A	Directions not made
Focus Area 3: Biodiversity and Conservation		
3.1 Conservation Zones	N/A	Not relevant to the subject planning proposal.
3.2 Heritage Conservation	Consistent	<p>The subject site adjoins a heritage item to the west. As described in the heritage impact statement, the proposed built forms are complimentary to the items and will not have any adverse impacts.</p> <p>The proposal is consistent with both the HASSELL urban design report prepared by the NSW Government for the Church Street North Precinct, along with the Council NEIPA planning proposal. An appropriate height and scale of buildings provides a transition to heritage areas, along with spaces between buildings, enabling view corridors to be enhanced.</p>
3.3 Sydney Drinking Water Catchments	N/A	Not relevant to the subject planning proposal.
3.4 Application of C2 and C3 Zones and Environmental	N/A	Not relevant to the subject planning proposal.

Ministerial Directions	Consistency	Comments
Overlays in Far North Coast LEPs		
3.5 Recreational Vehicle Areas	N/A	Not relevant to the subject planning proposal.
3.6 Strategic Conservation Planning	N/A	Not relevant to the subject planning proposal.
3.7 Public Bushland	Consistent	There are no areas of public bushland on the subject site
3.8 Willandra Lakes Region	N/A	Not relevant to the subject planning proposal.
3.9 Sydney Harbour Foreshores and Waterways	Consistent	A future development application can provide the necessary measures to manage water quality.
3.10 Water Catchment Protection	Consistent	The subject site is within an existing urban area and a future development application can provide the necessary measures to manage water quality.
Focus Area 4: Resilience and Hazards		
4.1 Flooding	Consistent	The site is not within the 1 in 100 year Average Recurrence Interval, however it is within the Probable Maximum Flood (PMF) area. This is confirmed by the Council Planning Proposal, along with the Draft Parramatta Flood Study 2023 which show no flood impact. Stormwater can be mitigated through the development application process.
4.2 Coastal Management	N/A	Not relevant to the subject planning proposal.
4.3 Planning for Bushfire Protection	N/A	The site is not impacted by a Bushfire Map, nor is it bushfire prone.
4.4 Remediation of Contaminated Land	Consistent	<p>The existing uses of the site include residential and commercial development which are unlikely to result in contamination of the land.</p> <p>The planning proposal is consistent with the aims and provisions of this SEPP.</p> <p>In any case, future redevelopment of the site will need to address the requirements of the SEPP. The proposal is consistent with the provision of this SEPP.</p>
4.5 Acid Sulfate Soils	Consistent	The site is identified as Class 5 on the Acid Sulfate Soils Map in Parramatta Local Environmental Plan 2011. This will be addressed further at the development application stages.

Ministerial Directions	Consistency	Comments
4.6 Mine Subsidence and Unstable Land	N/A	Not relevant to the subject planning proposal.
Focus Area 5: Transport and Infrastructure		
5.1 Integrating Land Use and Transport	Consistent	<p>The Planning Proposal is consistent with this direction, in that it:</p> <ul style="list-style-type: none"> - will provide new dwellings near existing public transport links - will enable residents to walk or cycle to work if employed in the Parramatta City Centre or utilise train services. - makes more efficient use of space and infrastructure by increasing densities on an underutilised site.
5.2 Reserving Land for Public Purposes	N/A	The planning proposal does not seek to change the current zoning provisions and therefore does not impact on land reserved for public purposes
5.3 Development Near Regulated Airports and Defence Airfields	N/A	The land is not within the vicinity of an aerodrome.
5.4 Shooting Ranges	N/A	The land is not within the vicinity of a shooting range.
Focus Area 6: Housing		
6.1 Residential Zones	Consistent	<p>The Planning Proposal is consistent with this direction, in that it:</p> <ul style="list-style-type: none"> - facilitates additional housing in the Parramatta CBD - provides residential development in an existing urban area that will be fully serviced by existing infrastructure - does not reduce the permissible residential density of land.
6.2 Caravan Parks and Manufactured Home Estates		The planning proposal does not seek to amend the current prohibition of caravan parks on this site
Focus Area 7: Industry and Employment		
7.1 Employment zones	N/A	Not relevant to the subject planning proposal.
7.2 Reduction in non-hosted short-term rental	N/A	Not relevant to the subject planning proposal.

Ministerial Directions	Consistency	Comments
accommodation period		
7.3 Commercial and Retail Development along the Pacific Highway, North Coast	N/A	Not relevant to the subject planning proposal.
Focus Area 8: Resources and Energy		
8.1 Mining, Petroleum Production and Extractive Industries	N/A	Not relevant to the subject planning proposal.
Focus Area 9: Primary Production		
9.1 Rural Zones	N/A	Not relevant to the subject planning proposal.
9.2 Rural Lands	N/A	Not relevant to the subject planning proposal.
9.3 Oyster Aquaculture		Not relevant to the subject planning proposal.
9.4 Farmland of State and Regional Significance on the NSW Far North Coast		Not relevant to the subject planning proposal.

SECTION C – ENVIRONMENTAL, SOCIAL AND ECONOMIC IMPACT

8. 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 subject site does not contain habitat of any description. There is no likelihood that critical habitat or threatened species, populations or ecological communities, or their habitats, will be adversely affected as a result of the planning proposal. No further assessment is considered necessary at this stage of the planning proposal.

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

The Planning Proposal seeks to facilitate a slight increase in density over the subject site, consistent with Council's existing NEPIA planning proposal.

It is noted both Council and the NSW Government have undertaken significant investigations into this area. The extract below from the NEPIA Planning Proposal provides appropriate consideration of how environmental effects are managed:

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

The main potential environmental impacts to be examined in detail with any future development proposal for the site are:

- Heritage impacts
- Urban Design and Built Form
- Flooding
- Transport, Traffic, Accessibility and Parking

Heritage impacts

Previous heritage studies commissioned by Council for the CBD PP that at the time included the NEPIA have been superseded by the SEPP process for the Church Street North Precinct. The Department's *Finalisation Report 2023* recommended strategies and principles developed by input from urban design and heritage specialists. For the NEPIA the relevant principles and strategies include responding to the adjoining HCAs and low scale residential uses by transitioning building heights downwards towards them and protecting view corridors.

The recommendations that have been applied by this Planning Proposal are based on a comprehensive approach to transition as required by the Department using a combination of height of building and FSR controls in the LEP and site planning controls in the (draft) DCP controls for the precinct. Stepped building heights and building alignment controls are utilised to provide for a design method to maintain and enhance existing heritage values. Furthermore, the NEPIA will enhance surrounding heritage value through framing the Sorrell Street HCA with large deep soil zones and vegetated setbacks to accommodate canopy tree plantings and allowing the landscape to act as a backdrop to heritage buildings.

Design Response and Built Form

The Planning Proposal seeks an amended to the LEP Height of Buildings Map and to the Floor Space Ratio Map to provide an increase in height from 11m to a range of 24m to 40m and an increase in FSR from 0.8:1 to a range of 2:1 to 3.6:1. The proposed increase is considered an appropriate transition in the context of concentrated height on Church Street towards the Sorrell Street HCA.

The recommended height of building controls for the NEPIA were determined using the 'viewshed' approach detailed in the Department-commissioned consultant study that informed mapped building heights in the CSN SEPP; as well as a mapped skyline strategy and acknowledgement of sites within the CSN precinct north of Harold Street that are unlikely to redevelop due to large 6- to 8-storey residential strata subdivisions.

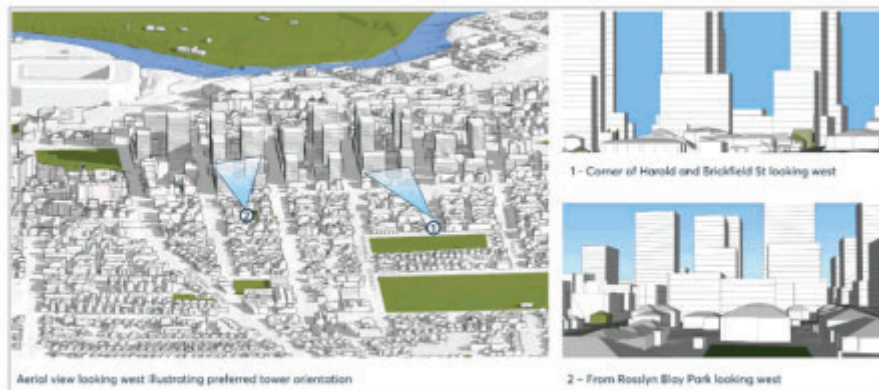
The recommended FSR controls for the NEPIA are based on achieving workable FSRs that align with the proposed height of building controls and creating workable residential floor plates within a slender tower form and podium, with space for deep soil and communal open space.

The recommended FSR and height limit for the site at 23-27 Harold Street, Parramatta (which is currently subject to a rezoning review), was determined using the same built form principles and outcomes-based approach for the NEPIA. The maximum FSR of 3.6:1 and a 40m height limit is proposed for the site noting this slightly higher FSR reflects the efficiencies of a smaller sized site.

Figure 4: Council officer modelling showing how the stepped height of buildings as well as the inter building separation with views to sky creates the transition between the Church Street North precinct and the sites within the NEPIA. Note that sites on Church Street North have been modelled to include potential design excellence and place based bonuses. View 1 and 2 are taken from the public domain using 60 degree human view cone and illustrate that when bonuses are applied, the tops of towers can no



longer be perceived. This reinforces the importance of combining principles of height transition with other methods of transition in the NEPIA.



Associated Development Control Plan (DCP)

To support the proposed amendments to the LEP outlined above, amendments are proposed to Part 8, Section 8.3 Neighbourhood Precincts in Parramatta DCP 2023.

Area specific DCP controls are considered necessary for the NEPIA primarily due to the heritage sensitivities and need to provide transition between the HCA and forthcoming new LEP controls for the Church Street North precinct. This new section of the Parramatta DCP is recommended to include objectives and controls for:

- The desired future character of the area, with consideration for existing context and how this precinct will redevelop incrementally over time,
- Minimum site requirements and preferred site amalgamation to ensure the objectives of future development in the area can be met,
- Heritage transition achieved through specified setbacks, street wall heights and building orientation,
- Deep soil and landscaping requirements for future amenity and to create a vegetated heritage setting,
- Consistent street setbacks that maintain heritage items as the dominant features of the streetscape and enable large canopy tree planting within the front setback zone,
- Tower separation to enable views to sky when observed from the Sorrell Street HCA (east), and
- Bespoke car parking rates that respond to the proximity to the City Centre and light rail infrastructure (see further discussion below).



Figure 5: Area specific DCP controls are proposed to achieve the Structure Plan for the North East PIA (buildings coloured red) and part of the Church Street North precinct (buildings coloured yellow).



Given the NEPIA consists only of R4 High Density Residential zoned land, the following Parts of the DCP will continue to apply in addition to the new site specific provisions proposed in Part 8: Part 2: Design in Context, Part 3: Residential Development, Part 5:

Environmental Management, Part 6: Traffic and Transport and Part 7: Heritage and Archaeology.

Design Context

The design process for the NEPIA has been carried out concurrent with the drafting of DCP controls for part of the Church Street North precinct where new LEP controls will soon take effect. Consequently, these precincts and their surrounds have been treated as a whole to determine a recommended outcome. Based on a spatial analysis of the area, several key design objectives have been established to guide the design approach. These are related to:

- Creating continuity between the City Centre from south of the river, northwards along the Church.
- Considering a more residential focus for future development outcomes in North Parramatta.
- Providing transition to heritage conservation areas to be achieved through both stepped building heights and space between buildings through setbacks and building separation.
- Maintaining the highly vegetated character of North Parramatta for tree canopy within street setbacks and rear gardens at mid-block.
- Establishing building alignments that respond to the prevailing alignment of heritage items in the area.
- Responding to the landscape and river setting with a skyline that follows the topography along the ridge.

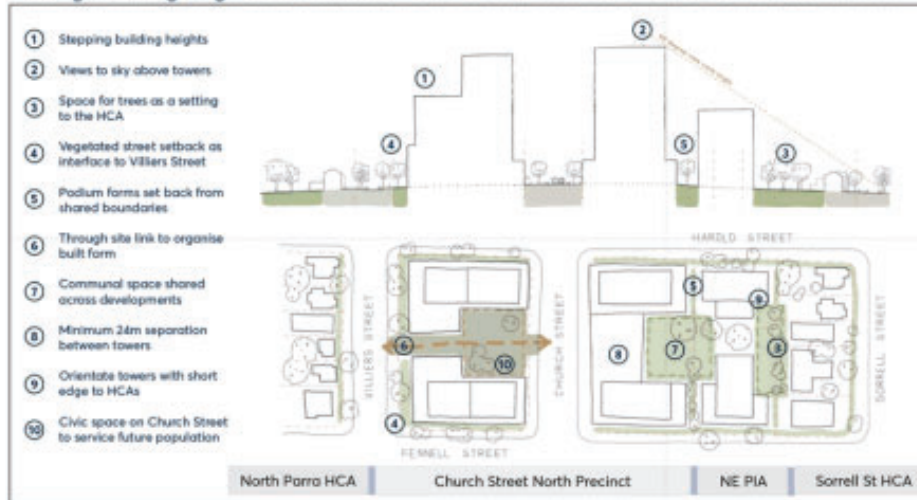
Although the design objectives and principles were developed for the whole area, the proposed LEP and DCP controls for the NEPIA are drafted so that they apply independently of the CSN SEPP area.

The recommendations for NEPIA are based on **comprehensive approach to transition** as required by the Department in the Church Street North SEPP Finalisation Report that includes a combination of both building height and site planning. The method for transition includes stepping in building height from Church Street properties to the Sorrell Street HCA, but also includes:

- Utilising detached buildings to mediate between perimeter block, podium tower development along Church Street and existing apartments and houses within the HCA,
- Locate vegetated setbacks and communal open space on the ground to provide landscape space as a frame/backdrop to heritage buildings and the HCA,
- Supporting deep soil zones on development sites, which enables canopy tree planting to be a setting to heritage,
- Ensuring any future development is setback from the prevailing heritage alignment on the street and that front setback zones support large canopy tree planting,
- Orientating the short edge of towers towards the HCA to minimise the bulk of towers perceived from the HCA,
- Maximising separation between towers where it can increase views to sky when observed from the HCA, and
- Encouraging slender tower forms and finer grain street wall typologies to tie into the surrounding lower scale context of North Parramatta.

This multifaceted approach to transition that has been applied to NEPIA sites is illustrated in **Figure 6** below.

Figure 6: Methods for achieving transition and unifying development across the precinct through building heights and setbacks between Church Street and the Sorrell Street HCA.



Flooding

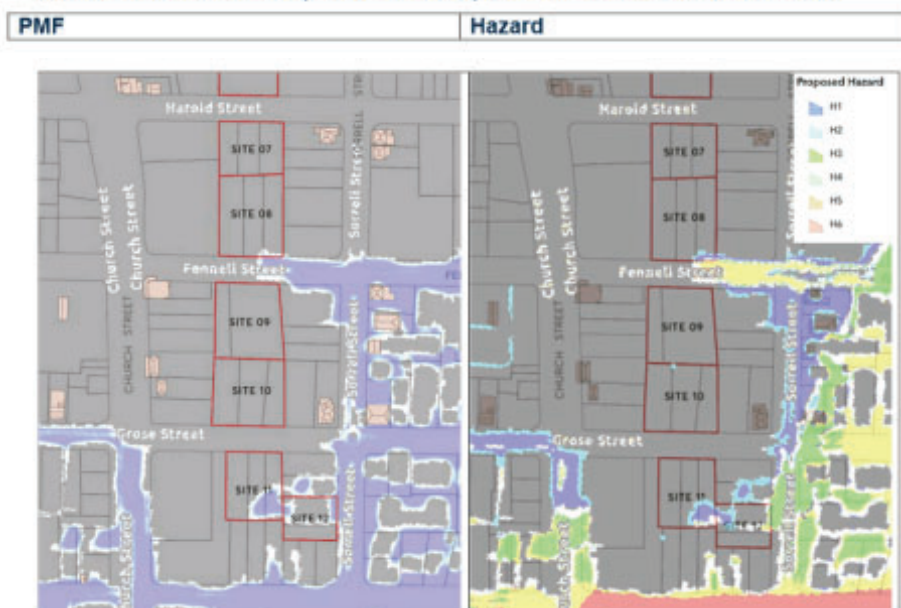
Preparation of this Planning Proposal has considered the current adopted flooding maps for the NEPIA, and the Council endorsed exhibition draft of the Parramatta River Flood Study (2023).

The current adopted flood maps indicate that the land within the NEPIA is not affected by the 100 year Annual Recurrence Interval (ARI) flood and the Probable Maximum Flood (PMF).

The draft Parramatta River Flood study shows that the majority of the NEPIA is unaffected by flooding except for a part of Fennell Street and Sorrell Street which are subject to increased risk of Probable Maximum Flood (PMF) and increased hazard risk (see Figure 7), compared to current flood information as shown in Section 4.1.

Any future development on the site will need to respond to the Flood Risk Development Manual and the relevant controls contained within the PLEP 2023 and the Parramatta Development Control Plan 2023.

Figure 7: Extract of the NEPIA consolidation/structure plan showing the sites under the draft Parramatta Flood Study 2023 affected by the PMF and the hazard affection.



Transport, Traffic, Accessibility and Parking

Preparation of this Planning Proposal has considered Council's Integrated Transport Plan 2021 (ITP) which at the time included the NEPIA. The ITP considered growth as a result of the CBD PP and modelled residential parking rates delineating the difference between locations that are within 800m or a 10-minute walk approximately from Parramatta train station (Category A) and other locations at the CBD fringes considered remote from heavy rail (Category B) as shown in **Figure 8**.

At the time of writing, a separate Planning Proposal is being prepared to request a Gateway to implement the recommendations of the ITP, and specifically applying the 'Category B' parking rates as outlined in **Table 14** to part of the adjacent Church Street North precinct.

While not within the 'City Centre' boundary, the Category B car parking rates are recommended by Council to be applied to the NEPIA via an area specific DCP control for the following reasons:

- the areas proximity to the City Centre and existing and future public transport and generally subject to the same traffic conditions as the Church Street precinct; and
- anticipated development typology (tower and podium with basement car parking) is the same as Church Street.

There are no other transport, traffic, accessibility and parking issues as a result of this Planning Proposal.

Figure 8: Parramatta Residential Parking Rate Categories (Source: [Parramatta Integrated Transport Plan 2021](#)), the NEPIA is within the red circle.



Table 14: Comparison of number of car parking space requirements

Residential Parking Rate	Parramatta DCP current general controls that apply to the NEPIA – Minimum required number of spaces	ITP 'Category A' controls in PLEP 2023 Part 7 City Centre – Maximum required number of spaces	ITP 'Category B' recommended controls for inclusion in PDCP 2023 Part 8 precinct controls for the NEPIA– Maximum required number of spaces (proposed)
Studio	0.6	0.1	0.2
1 bedroom	0.6	0.3	0.4
2 bedroom	0.9	0.7	0.8
3+ bedroom	1.4	1.0	1.1

In addition to the above, detailed urban design assessment of the proposal has been undertaken by Architectus, which included view analysis to test built form outcomes. Likewise, heritage advice has also been included to inform this planning proposal as discussed earlier.

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

The social and economic effects of the Planning Proposal are most appropriately described in the context of the challenges associated with a growing population as described in the State Government document the Metropolis of Three Cities. Among other things, the Plan explains that to meet the needs of a larger population and to maintain economic growth, urban renewal in combination with infrastructure delivery must occur in strategic urban centres.

As previously described, the objective of the Planning Proposal aligns closely with the strategic direction identified in the Metropolis of Three Cities. The delivery of high-density housing in a location that is well serviced by infrastructure and where there are minimal existing environmental site constraints is considered to represent a positive social outcome.

The Planning Proposal will facilitate future development that will result in higher population densities in Parramatta. In this regard, the Planning Proposal will support the emergence of Parramatta as Sydney's Central City which will in turn contribute to continued economic growth.

SECTION D – INFRASTRUCTURE (LOCAL, STATE AND COMMONWEALTH)

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

The site is suitable for high density residential development due to its superior access to transport and employment opportunities in the Parramatta CBD.

Given the proximity of the subject site to public transport services including the Parramatta light rail and bus services it is anticipated that a significant proportion of new residents would opt to use public transport rather than private vehicle.

The subject site is located adjacent to the Parramatta CBD which has a variety of health, education and emergency services. In a broader context, the subject site is within proximity to Westmead Hospital and the Western Sydney University which are regional institutions.

The Council has endorsed an infrastructure strategy as part of the Parramatta CBD Planning Proposal which is actualised through the floor space ratio controls proposed within the Parramatta CBD Planning Proposal. The provisions require delivery of

community infrastructure to the satisfaction of the consent authority, whether provided on the subject site or an alternative site nominated by the consent authority.

SECTION E – STATE AND COMMONWEALTH INTERESTS

12. What are the views of state and federal public authorities and government agencies consulted in order to inform the Gateway determination?

The Planning Proposal has not yet received Gateway determination and consultation with the public authorities has not yet commenced.

PART 4 – MAPS

The planning proposal seeks amendments to the Floor Space Ratio Map and the Height of Building Map.

Figure 21: Floor Space Ratio Map – existing and proposed (Spatial Viewer)

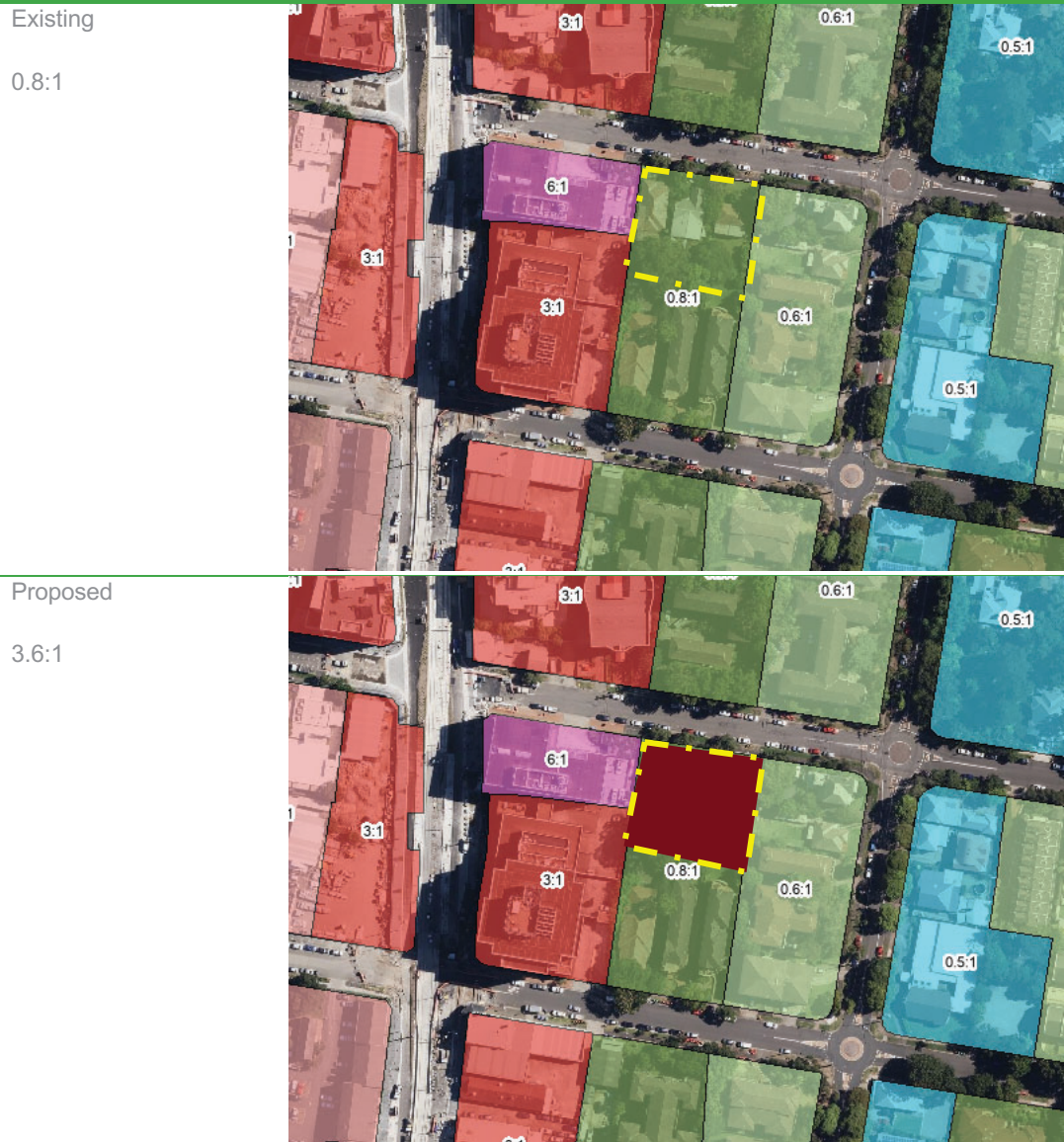
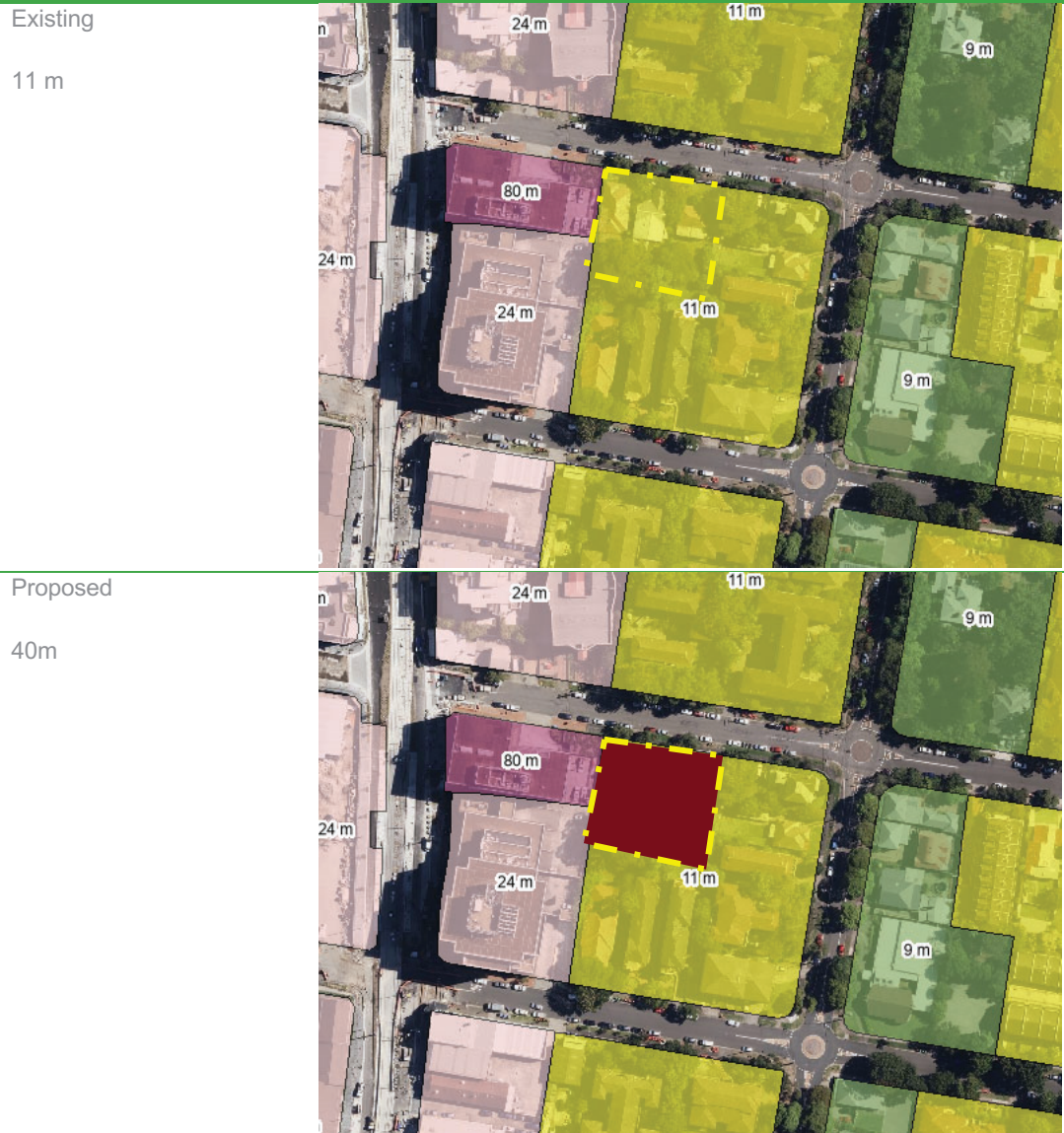


Figure 22: Height of Buildings Map – existing and proposed (Spatial Viewer)



PART 5 – COMMUNITY CONSULTATION

Community consultation will be undertaken in accordance with the requirements prescribed by the Gateway determination.

PART 6 – PROJECT TIMELINE

A project timeline is yet to be determined however will be formulated following discussions with the Sydney Central City Planning Panel (Strategic Planning Panel) who is the determining authority and confirmation of any additional information required to allow consideration of the Planning Proposal.

An indicative timeline for the planning proposal includes:

Milestone	Timeframe
Gateway determination	December 2024
Pre-exhibition	January 2025
Commencement and completion of public exhibition period	February/ March 2025
Consideration of submissions	March/April 2025
Post-exhibition review	May/June 2025
Department finalisation	July 2025
Gazettal of LEP amendment	August 2025

CONCLUSION

This Planning Proposal explains the intended effect of and provides a justification for a proposed amendment to the Parramatta Local Environmental Plan 2023 (Parramatta LEP 2023). The Planning Proposal has been prepared in accordance with Section 3.33 of the *Environmental Planning and Assessment Act 1979* and the Department of Planning and Environment's document *Local Environmental Plan Making Guideline* (August 2023).

The Planning Proposal describes how the intended outcome of the proposed LEP amendments aligns closely with the strategic directions established in State Government documents including the Six cities Discussion paper, A Metropolis of Three Cities – Greater Sydney Region Plan, the Central City District Plan, the Greater Parramatta and Olympic Peninsular Plan, the CBD Planning Proposal, and the Parramatta CBD Strategy.

It is considered that the LEP amendments sought by the planning proposal will allow for the accelerated delivery of both mixed use and high-density residential development in an area that is well serviced by public transport and infrastructure and has been identified as a key urban renewal precinct. The planning proposal is considered to have strong merit based on a sound analysis of relevant planning considerations and is submitted to Parramatta City Council for consideration.