

18 April 2018

17297

Carolyn McNally  
Secretary  
Department of Planning and Environment  
320 Pitt Street, Sydney

Attention: Ann-Marie Carruthers, Director Sydney Region West

Dear Ms McNally,

**Request for Rezoning Review  
1-7 Station Street, Parramatta**

This letter has been prepared by Ethos Urban on behalf of Greenrock Property Group Pty Ltd (Greenrock) in relation to 1-7 Station Street, Parramatta (the Site). The site is the subject of a Planning Proposal seeking to amend the building height, floor space ratio (FSR) and heritage controls that apply to it under the *Parramatta Local Environmental Plan 2011* (Parramatta LEP). The purpose of this letter is to request that the Department of Planning and Environment (DP&E) initiate a rezoning review for the Planning Proposal.

An initial meeting was held with Council on Thursday 30 August 2015 to discuss the merits of the site. At this meeting the applicant was welcomed to submit a Planning Proposal to facilitate the redevelopment of the site.

The Planning Proposal was submitted to Council on 11 March 2016 and seeks to make the following amendments to the Parramatta LEP 2011:

- Increase the FSR control from 2:1 to 10:1 (11.5:1 then achievable with 15% design excellence bonus);
- Increase the building height limit from 18m to 142m; and
- Remove the local heritage listing of the item at 7 Station Street (I744).

The rezoning Review is being sought by the applicant as Council has not determined the Planning Proposal within 90 days.

This letter should be read in conjunction with the following supporting attachments:

- Signed Pre-Gateway Review Application Form;
- A cheque for \$20,000, being the relevant application fee;
- A hard and soft copy of the Planning Proposal including additional information as provided in response to Council's requests for further information; and
- All correspondence received from Council.

## 1.0 Rezoning review

This request for Rezoning Review has been prepared in accordance with the Guidelines set out in the DP&E's *Guide to Preparing Local Environmental Plans* (the Guide)

### 1.1 Step 1 – Proponent Seeks Review

Step 1 of the Guide provides that a proponent may seek a Rezoning Review if:

*b) the council has failed to indicate its support 90 days after the proponent submitted a request, accompanied by the required information or has failed to submit a planning proposal for a Gateway determination within a reasonable time after the council has indicated its support.*

This rezoning review is being sought as Council has failed to indicate its support for the Planning Proposal within 90 days of the lodgement of the request. Council accepted a fee for the Planning Proposal on 11 March 2016 demonstrating that they formally accepted the Planning Proposal. As outlined in **Table 1** below, 766 days have passed since the Planning Proposal was lodged and Council has not indicated that insufficient information was provided with the proposal.

The applicant has maintained an open dialogue with Council throughout the assessment process and has proactively engaged with Council to resolve issues that have arisen throughout their assessment. Notwithstanding this, a rezoning review is being sought as an agreement with Council on key components of the proposed LEP amendment have not been reached.

The key milestones and correspondence between the applicant and Council throughout the assessment are provided in **Table 1** below.

**Table 1 - Timeline of Planning Proposal Assessment**

Action	Date	No. of Days (cumulative)
Lodge Planning Proposal	11 March 2016	
Assessment		132
Applicant Writes to Council	21 July 2016	132
Council Writes to applicant requesting items to be clarified	18 August 2016	160
Council Writes to applicant amending letter with correct site address	6 September 2016	179
Applicant responds to Council	19 September 2016	192
Council writes to applicant	25 November 2016	259
Applicant responds to Council	11 January 2017	306
Council writes to applicant	17 August 2017	524
Applicant responds to Council	12 October 2017	580
Applicant lodges rezoning review	18 April 2018	768 (as of 18 April 2018)

## 1.2 Step 2 - Strategic Merit

Step 2 of the DP&E's *A Guide to Preparing Planning Proposals* requires the Planning Proposal to have strategic merit, as outlined below.

### a) Does the proposal have strategic merit? Is it:

**Question 1. Consistent with the relevant regional plan outside of the Greater Sydney Region, the relevant district plan within the Greater Sydney Region, or corridor/precinct plans applying to the site, including any draft regional, district or corridor/precinct plans released for public comment**

#### Greater Sydney Region Plan: A Metropolis of Three Cities

In March 2018 the Greater Sydney Commission (GSC) finalised the *Greater Sydney Region Plan: A Metropolis of Three Cities* (Region Plan). The Region Plan elevates the role of Parramatta to Sydney's Central City and identifies that Sydney's population is expected to grow by an additional 1.7 million people to 2036. The Planning Proposal will achieve the aims of the Region Plan, which identifies that population growth estimates have risen by 9% since the release of *A Plan for Growing Sydney*. In this regard, the Planning Proposal seeks to provide additional residential density in Parramatta, Sydney's Central City.

The Planning Proposal is consistent with the Region Plan as it facilitates the growth of Parramatta as Sydney's Central City through increasing the supply of housing located in close proximity to public transport, jobs, education and services. Specifically, the proposal achieves the following directions in the Greater Sydney Region Plan:

- **Objective 10: Greater Housing Supply** - The proposal will directly facilitate the growth of the Parramatta CBD by facilitating a residential development adjacent to a CBD train station. The proposal seeks to implement a density of 10:1 on the site, commensurate with the density in other major centres and renewal areas in Sydney. The proposal will facilitate greater housing supply and the growth of the Parramatta CBD as it will:
  - Enable a residential tower on the site that is able to achieve an appropriate level of residential amenity and as such will contribute to the significant population growth targets for Central District in a sustainable and high-quality way.
  - Enable additional residential floor space on a site that is located adjacent to the second train station in the Parramatta CBD (Harris Park). As such the proposal will facilitate additional dwellings in a location well serviced by high capacity transport.
  - Facilitate a mixed use residential development that is in close proximity to significant employment precincts, community and civic facilities, educational and health facilities.
  - Revitalise an underutilised city centre block by enabling a built form outcome that will strengthen the CBD skyline with density located at transport nodes, is consistent with the sites CBD location and will be capable of achieving a high level of residential amenity and increased employment capacity.
  - Improve traffic congestion by locating higher density development in close proximity to public transport infrastructure.

As illustrated in **Figure 3** below the proposal seeks to provide additional residential density adjacent to public transport. The level of density is commensurate with the remainder of the CBD however is located directly adjacent to a train station, unlike most parts of the CBD.

The Region Plan provides that the most suitable areas for significant urban renewal are those areas best connected to employment and within walking distance of regional high frequency public transport. The Planning Proposal directly achieves this direction through increasing the permitted density on a site located 100m from Harris Park station and 170m to the Auto Alley employment precinct (26,000 jobs).

- Objective 14: A Metropolis of Three Cities – integrated land use and transport creates walkable and 30-minute cities- The proposal will facilitate growth through appropriately located residential density adjacent to a train station and within walking distance of significant employment, services and education facilities within the Central City. The proposal will result in the amalgamation of small fragmented inner-city allotments to facilitate a taller tower form, consistent with Council's intention to locate additional density on larger sites (through minimum site area FSR sliding scales and opportunity site requirements).

The proposal will also better utilise the investment in Harris Park station (refer to **Section 2.1** below) by locating additional residential density within close walking proximity of the station. The proposal will facilitate the use of public transport, assisting in the creation of a 30-minute city.

- Objective 19: Greater Parramatta is stronger and better connected – One of the pillars of the Region Plan is to reinforce Parramatta's role as a metropolitan centre of comparable scale to the Sydney CBD. Significant growth in infrastructure, commercial, educational and medical investment has and will continue to drive the growth of Parramatta.

In order to accommodate this growth, Parramatta must grow its housing supply accordingly, consistent with objectives to create a 30 minute city and provide for additional housing growth. The proposal will facilitate Parramatta's growth as one of Sydney's dual CBDs by providing for housing of a scale and quality commensurate with its role as one of Greater Sydney's major metropolitan centres.

### Central City District Plan

The Planning Proposal is also consistent with the Central City District Plan (District Plan), which was finalised in March 2018. The Planning Proposal will contribute to Parramatta's 5-year (2016-2021) housing target of 21,650 dwellings identified in the District Plan and will facilitate the minimum 20 year housing target of 207,500 dwellings for the Central District.

It is noted that the forecast growth of 207,500 dwellings for the Central District is the highest of any of the Greater Sydney districts, providing 28% of the required 1,725,000 dwellings for Sydney to 2036. Residential growth targets for Metropolitan Sydney have increased a further 9% from those forecast in *A Plan for Growing Sydney*, which increased targets from the Draft Metropolitan Strategy by 22% when it was released in late 2014. The Planning Proposal will support the growth of Parramatta, Sydney's central city and provide critical housing in an appropriate location, adjacent to high capacity public transport.

Specifically, the Planning Proposal is consistent with Planning Priority C5 - *Providing housing supply, choice and affordability with access to jobs and services*. The District Plan states that the following criteria should be used for urban renewal:

1. *Alignment with investment in regional and district infrastructure which acknowledges the catalytic impacts of infrastructure such as Sydney Metro Northwest, NorthConnex, WestConnex and Parramatta Light Rail*

The proposal seeks to locate additional density immediately adjacent to Harris Park Station, the Central City's second piece of high capacity transport infrastructure. As outlined in **Section 2.1**, investment in upgrading the station and platform facilities Harris park station is currently underway. As such the proposal will directly align with investment in transport infrastructure as it seeks to locate additional dwellings directly adjacent to a train station that is undergoing upgrade works.

2. *other possible future investments such as Sydney Metro West and opportunities created by enhancements to existing infrastructure such as upgrades to schools, open space including sporting facilities and transport*

The proposal's location next to Harris Park train station will provide access to Sydney Metro West and other future city-serving corridors, as identified in Transport for NSW's *Future Transport 2056*.

3. *Accessibility to jobs, noting over half of Greater Sydney's jobs are generated in metropolitan and strategic centres.*

The proposal seeks to locate additional residential density within 170m of the Auto Alley Precinct that will provide approximately 26,000 jobs. Furthermore, the proposal seeks to provide additional housing in a location adjacent to transport infrastructure within Sydney's central city, providing access to the planned baseline target of 137,000 jobs in Greater Parramatta in 2036.

4. *Accessibility to regional transport, noting that high frequency transport services can create efficient connections to local transport services and expand the catchment area of people who can access regional transport.*

The proposal seeks to locate additional dwellings directly adjacent to an existing train station serviced by two lines providing regional connections.

5. *catchment areas within walking distance (10 minutes) of centres with rail, light rail or regional bus transport.*

The proposal seeks to locate additional dwellings in Sydney's Central City and has walking access to regional transport links including Harris Park Station, the Parramatta Transport Interchange, Parramatta Light Rail and future West Metro.

### **Question 2. Is it consistent with a relevant local council strategy that has been endorsed by the Department?**

The Planning Proposal is consistent with Part (a)(1) of *A Guide to Preparing Planning Proposals* strategic merit test and as such is not required to be consistent with part 2 or 3. Notwithstanding

this the Planning Proposal is consistent with Council's endorsed Parramatta CBD Planning Framework as seeks to:

- Facilitate growth of Parramatta;
- Does not overshadow any parks or areas of protected public domain;
- Create a tall, slender tower that facilitates an increase in residential density located in close walking proximity to transport infrastructure; and
- Provides for density on a large site in excess of 1,800m<sup>2</sup>.

We note that the proposal (10:1) is not consistent with the FSR control proposed under the CBD Planning Proposal (6:1); however it remains consistent with the objectives and intended outcomes of the Planning Proposal, as it will:

- Strengthen Parramatta's position as the dual/Central CBD for metropolitan Sydney;
- Increase the capacity for new dwellings in order to create a dynamic and diverse city;
- Provide for a high quality new linear park and public domain improvements;
- Facilitate the provision of community infrastructure to service the growing city;
- Enhance the quality and amount of commercial floor space on the site;
- Facilitate the creation of a sustainable residential building envelope; and
- Not result in any adverse risks to life and property from flooding.

While the Parramatta CBD Planning Proposal has not yet been endorsed by DP&E, they are Council's endorsed strategies to grow the CBD and are commensurate with the aims around growing Parramatta in the relevant strategic planning documents.

**Question 3. Responding to a change in circumstances, such as the investment in new infrastructure or changing demographic trends that have not been recognised by existing planning controls.**

The existing LEP controls for the site were included in the *Parramatta City Centre Local Environmental Plan 2007* and transferred into the Parramatta LEP 2011 in December 2015. The controls for the site are therefore almost ten years old and do not reflect the changing circumstances that have elevated Parramatta into Sydney's Central City and a major CBD. Parramatta's elevated role in Metropolitan Sydney has resulted in significant transport investment in close proximity to the site including the Western Sydney Light Rail and the West Metro Rail.

Additionally, as outlined in **Section 2.1** below, the proposal seeks to increase residential density on a site that is located adjacent to a train station undergoing platform upgrades. The upgrades to Harris Park station will facilitate greater improved passenger amenities and usability of the station, commensurate with its expected increase in patronage resulting from the growth of the Parramatta CBD. In this regard the proposal will utilise the investment in transport infrastructure.

## 2.0 Transit Oriented Development

Site is located approximately 100m to the south of the Harris Park train station and as such is ideally located to support additional density. Harris Park station is the second train station in the Parramatta CBD and will play an important role in distributing platform capacity from the Parramatta Station.

The Parramatta Strategic Transport Study was prepared by AECOM on behalf of Council to support the CBD Planning Proposal. The Strategic Transport Study identifies that the T1 Western line is currently experiencing overcrowding and Parramatta Station is experiencing issues resulting from platform crowding. The Study states:

*Issues are also already experienced at Parramatta Station, where crowding and minor delays can be experienced at vertical transport connections to the platforms as trains unload in the morning peak periods. It is forecast that the future Parramatta CBD will:*

- *Require significant additional services to support growth: strategic demand forecasts indicate a need for the equivalent of at least 15 additional AM peak hour services by 2056*
- *Require significant additional station and interchange capacity: with demand through Parramatta Station forecast to double by 2036 - surpassing current turnover through Town Hall during peak periods – and would increase further with the proposed delivery of Sydney Metro West.*

The proposal seeks to increase density in the southern portion of the CBD, an area that is serviced by Harris Park Station. Current growth and planned growth in Parramatta is centralised around the use of Parramatta Station and as such is exacerbating platform capacity issues identified above. As outlined in the sections below, Harris Park Station is currently undergoing significant investment to cater for increased patronage and is substantially underutilised with respect to patronage numbers compared to Parramatta station and other major centres in Sydney. The proposal seeks to locate additional residential density within 100m of Harris Park Station, Parramatta's second CBD train station, and as such better utilise this infrastructure and will assist in sharing platform capacity with Parramatta Station.

### 2.1 Harris Park station upgrades

The NSW Government is improving accessibility at Harris Park Station. The works form part of the government Transport Access Program, designed to encourage greater public transport use and better integrate station interchanges with the role and function of town centres. The improvements will also support a stronger customer experience outcome to deliver seamless travel, and encourage patronage and will include:

- Three new lifts.
- A family accessible toilet.
- New canopies for weather protection and undercover bicycle racks.
- Improved interchange area.

- Upgrades to lighting and CCTV surveillance.



**Figure 1 – Harris Park Station montage**

Source: Transport for NSW

## 2.2 Utilisation of Harris Park Station

The Parramatta CBD is envisaged to be Sydney's central city. The CBD Planning Proposal locates the majority of the city's density proximate to the Parramatta Station however does not locate substantial density at the Harris Park station. We consider that this will result in a constraint for the long term growth of Sydney's central city as the proposed density does not adequately utilise the existing high capacity transport infrastructure, resulting in a reliance on transport in the central portion of the CBD that may result in over capacity platforms, as identified in the Strategic Transport Assessment above.

The Sydney CBD is serviced by four train lines across seven train stations (Central, Town Hall, Circular Quay, Martin Place, St James and Museum stations) with the Sydney Metro line providing another line and two new high capacity stations. Harris Park Station is serviced by two lines (on a single station).

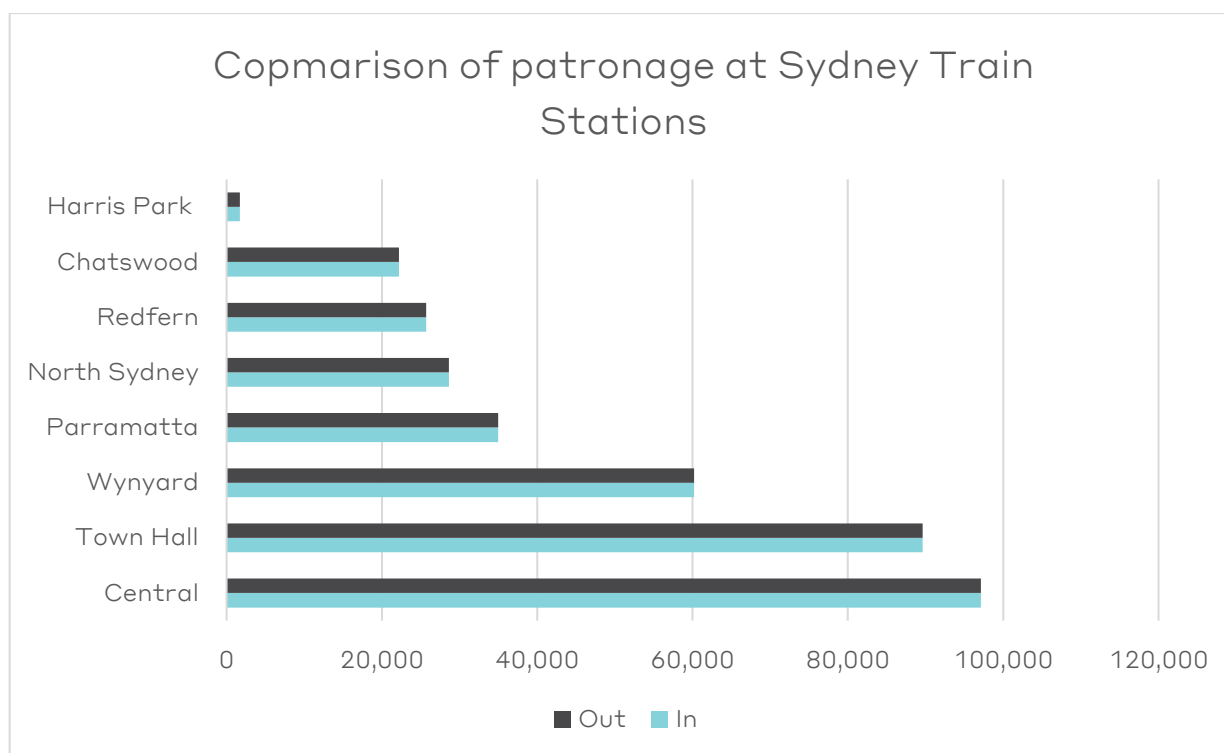
**Table 2** below identifies to total of movement (in/out), and rank of the top 7 stations in Metropolitan Sydney. The table clearly shows that the infrastructure at Harris Park Station is underutilised and has the capacity to service a greater number of patrons than existing, particularly in line with planned Station upgrades



**Table 2 - Rank of Sydney train station usage over 24 hour period (Transport Statistics 2014)**

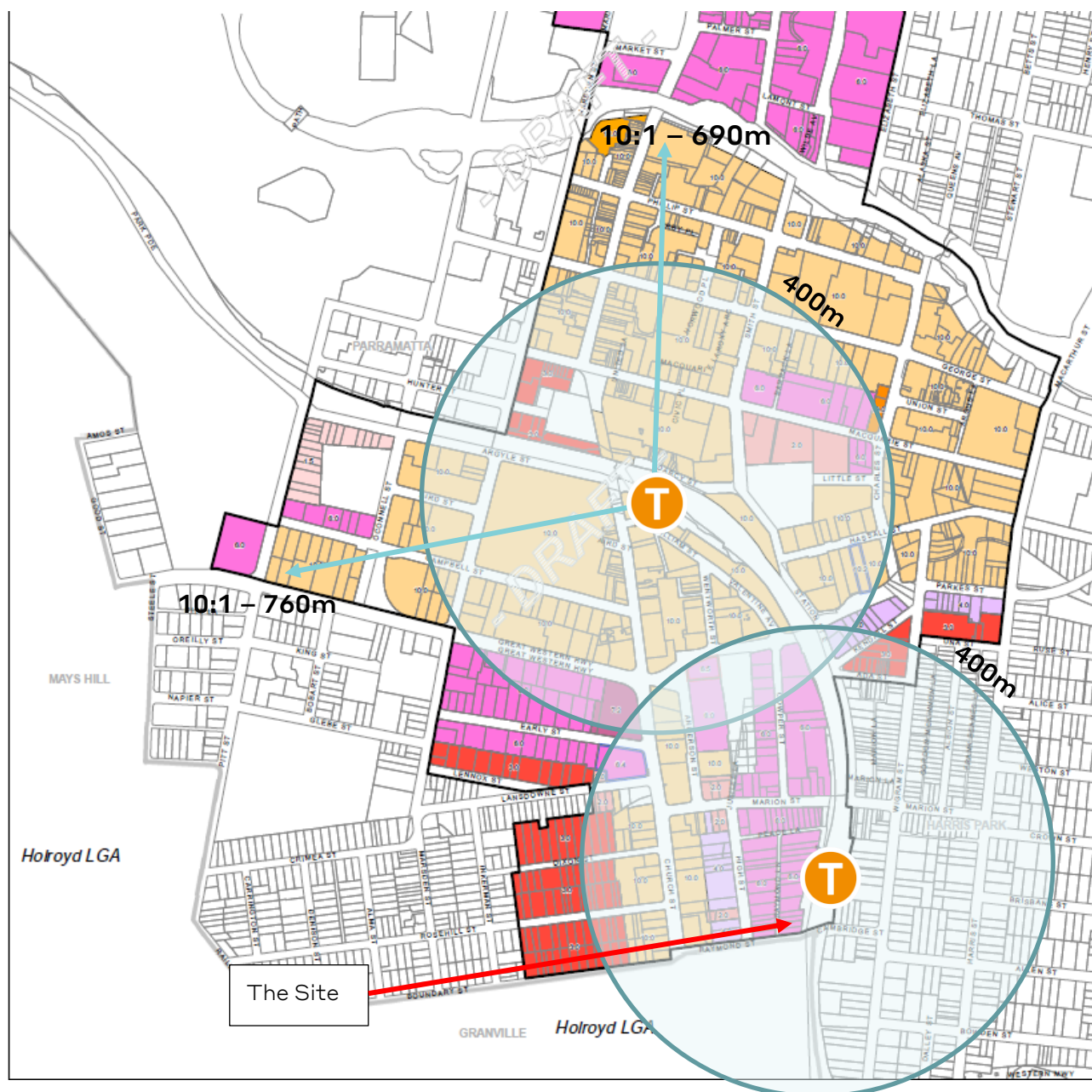
Location	In	Out	Rank	No. of lines
Central	97,110	97,110	1	5
Town Hall	89,620	89,620	2	4
Wynyard	60,200	60,200	3	3
Parramatta	34,960	34,960	4	2
North Sydney	28,610	28,610	5	1
Redfern	25,680	25,680	6	5
Chatswood	22,200	22,200	7	1
<b>Harris Park</b>	<b>1,710</b>	<b>1,710</b>	<b>130</b>	<b>2</b>

**Figure 2** below illustrates a comparison of Sydney train station patronage.

**Figure 2 - Sydney train stations patronage comparison**

For Parramatta to be realised as Sydney's Central City it will need to provide high capacity transport in multiple accessible locations, similar to the Eastern City. We consider that a density of 6:1 (proposed in the Parramatta CBD Planning Proposal) immediately adjacent to the second station in the Central city is not the highest and best use of the land and will constrain growth in the CBD in the future.

**Figure 3** below illustrates the location of Parramatta's two existing train stations and the proximity of density to each station proposed in the CBD Planning Proposal. As illustrated in **Figure 3**, the majority of density in the CBD relies on Parramatta Station for access to high capacity transport. Even with the addition of the Parramatta Light rail and West Metro, the density proposed in the southern portion of the CBD significantly underutilises the existing infrastructure at Harris Park station.



**Figure 3 - Proximity of proposed density to rail infrastructure**

## 3.0 Heritage

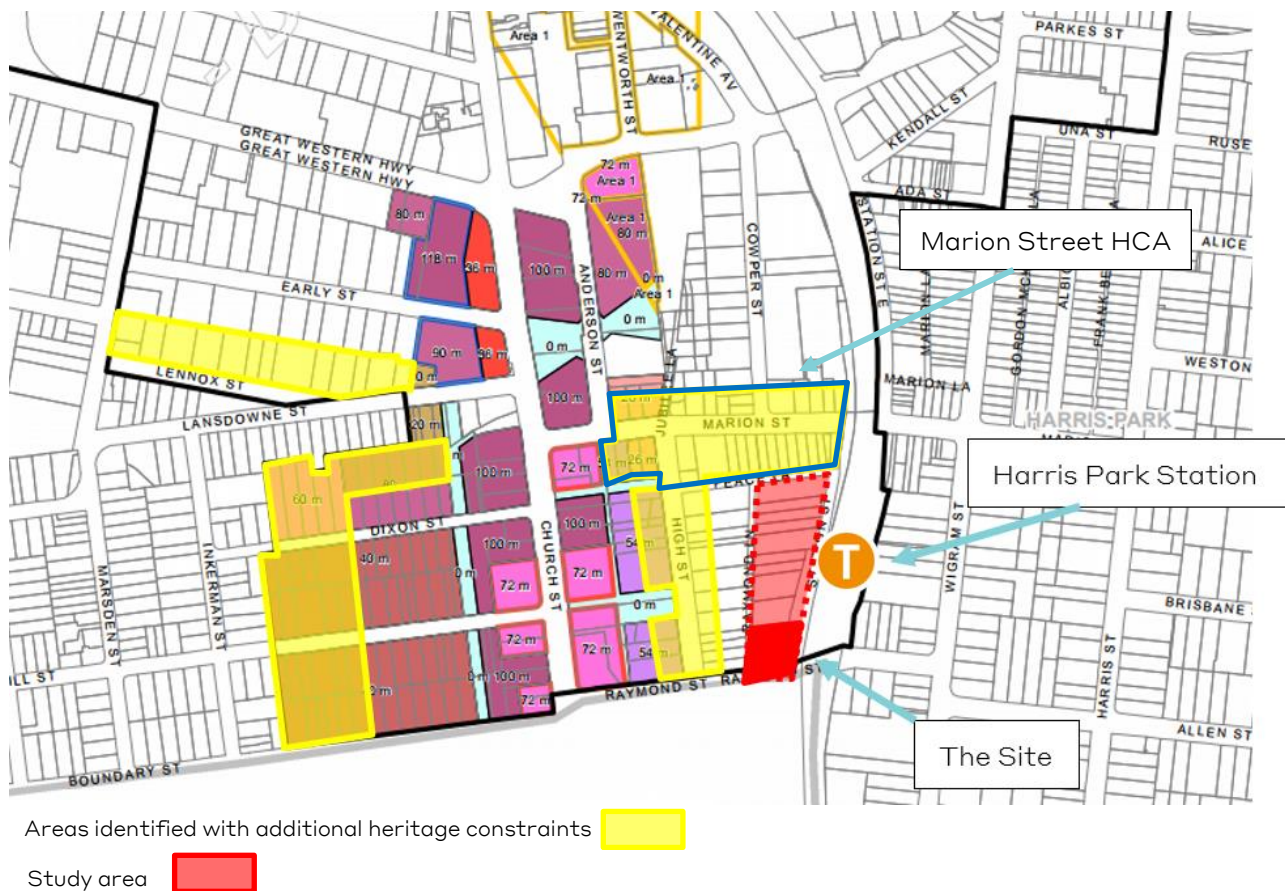
### 3.1 Heritage Listing of No. 7 Station Street

On 17 August 2017 (524 days after the proposal was lodged), Council wrote to the applicant to advise that an independent Heritage assessment of the locally listed heritage item at No. 7 Station Street had been undertaken by City Plan (refer to August 17<sup>th</sup> 2017 Council letter). The independent review agreed with the assessment in the Planning Proposal that the item did not warrant heritage listing. As such Council has supported the proposed removal of the heritage listing for the item at 7 Station Street.

### 3.2 Heritage Interface

In July 2017 Council endorsed the Parramatta CBD Heritage Interface Study (Heritage Interface Study) to be forwarded to DP&E for consideration as part of the CBD Planning Proposal. The Heritage Interface Study was commissioned by Council to respond to the issues raised by the Heritage Council and the DP&E with respect to the height and FSR controls proposed in the CBD Planning Proposal and the resulting interface implications to the Heritage Conservation Areas surrounding the CBD.

The endorsed Heritage Interface Study recommended that the built form controls in a number of areas throughout the CBD reduced in scale to better respond to the heritage fabric of the CBD and surrounds. The Heritage Interface study also recommends that a new Heritage Conservation Area is created for the Marion Street precinct (located to the north of the site). **Figure 4** below illustrates the land subject to recommendations in the Heritage Interface Study. The restrictions relate to reduced height controls and the new Marion Street HCA.



**Figure 4- Location of heritage constraints in the southern portion of the CBD**

Source: Hector Abrahams

The Heritage Interface Study included an assessment of the subject site and street block with respect to the Tottenham Street HCA located to the south of the site, across Raymond Street. The study did not include any recommendation to reduce the scale of the buildings on the subject site or in the study precinct (shaded in red in **Figure 4** above) and as such supported the proposed removal of the building height limits as proposed in the CBD Planning Proposal. The Heritage Interface study did include a number of recommendations surrounding historic setback patterns, areas of deep soil and modulating building facades etc. The applicant supports these recommendations and considers that these matters are to be addressed during the design competition phase and are not relevant to the Planning Proposal stage.

## 4.0 Replacing Dwellings in the Parramatta CBD

As a result of the building height controls recommended in the Heritage Interface Study, a reduction of approximately 870 dwellings and 113 jobs from the numbers sought under the Parramatta CBD Planning Proposal will be realised (Council business paper dated 10 July 2017 paragraph 40-41, item 11.15). While it is acknowledged that the biggest reduction in density will occur in the Sorrell Street precinct, the Marion Street precinct (to the north of the site) will also result in a loss of density as a result of the height restrictions and the creation of a potential new HCA.

We note that the site specific Planning Proposal seeks to achieve a density greater than that proposed under the CBD Planning Proposal (10:1 compared to 6:1) and as such provides an opportunity to accommodate the loss of density resulting from the Heritage Interface Study. The additional floor space resulting from a density of 10:1 across the Station Street block (study area identified in **Figure 4** above) compared to 6:1, would result in approximately 400-450 additional dwellings, all within 100m of the train station.

We consider that the site is ideally located to accommodate the additional density as it:

- Is located within 100m of Parramatta's second train station;
- Is located 170m to the east of the future Auto Alley precinct employment accommodating up to 26,000 jobs;
- Is not considered to have heritage interface issues that would restrict the built form; and
- Is of an appropriate land amalgamation size to accommodate a high density development, commensurate with Parramatta Council's opportunity site requirements of 1,800m<sup>2</sup> and 40m street frontage.
- Its location in a Strategic Centre and in proximity to transport infrastructure is consistent with density supported by the DP&E in other regions including Ryde, Wentworth Point and Macquarie Park.

## 5.0 Urban Design Rationale

The Urban Design Analysis submitted with the Planning Proposal identified a number of key urban design principles, consistent with the Parramatta Council's opportunity site requirements of 1,800m<sup>2</sup> and 40m wide frontage, that make it appropriate for a high density development:

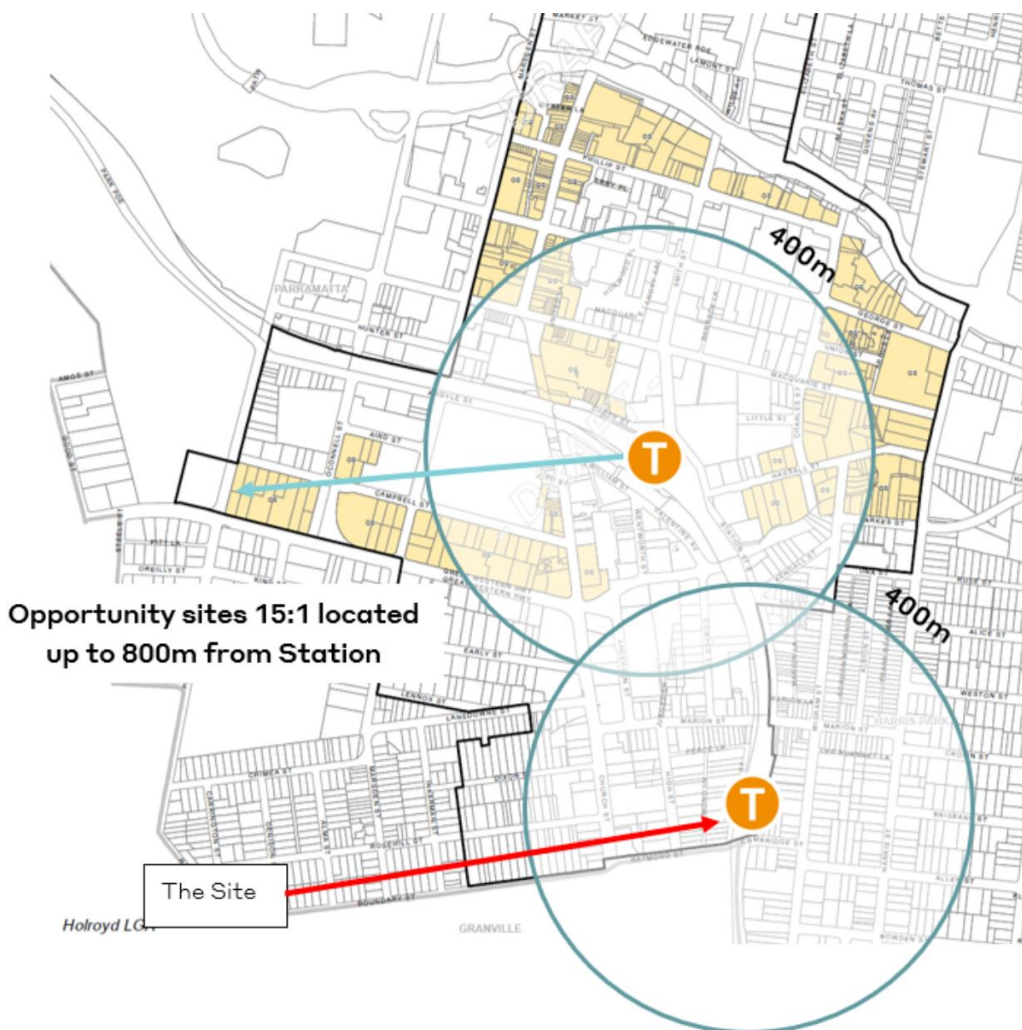
- The site comprises the amalgamation of four properties to achieve a site area in excess of 1,800m<sup>2</sup>;
- The site has three street frontages;
- A 40m site frontage/width at the building line;
- Ability to achieve appropriate transition to heritage;
- Proximity to high capacity public transport; and
- The ability to provide a public benefit.



We note that the Parramatta CBD Planning Proposal was endorsed by the Council after the site specific Planning proposal was lodged however it identifies the same principles for Opportunity Sites, being mixed use sites that are eligible for additional density provided they satisfy the following criteria:

- the development site is at least 40 metres wide at the front building line, has an area of at least 1,800 square metres; and
- the development demonstrates an appropriate transition to any heritage items; and
- the development includes community infrastructure to the satisfaction of the consent authority, whether or not provided on the development site or an alternative site nominated by the consent authority.

As illustrated in **Figure 5** below, the CBD Planning Proposal seeks to locate opportunity sites, that are eligible for FSR controls up to 15:1, up to 800m from the nearest station. The figure also illustrates that there are no opportunity sites located within 400m of the Harris Park station.



**Figure 5- Location of opportunity sites within the CBD**

In this regard we consider that the proposal has site specific merit and aligns with Council's endorsed criteria for sites that are appropriate for higher density. The Urban Design Analysis submitted with the Planning Proposal identified a potential building arrangement for the street block whereby adjoining sites are amalgamated to achieve the above criteria. This arrangement is illustrated in **Figure 6** below.



Opportunity site No. 2 2

*\*Note that the land fronting High Street would no longer be included in this amalgamation pattern.*

**Figure 6- Potential amalgamation plan submitted with Planning Proposal**

Following the endorsement of the CBD Planning Proposal, the applicant wrote to Council on July 2016, noting that Council had recently endorsed the CBD Planning Proposal that included opportunity sites. The letter identified that the subject meets the 1,800m<sup>2</sup> lot size and 40m street frontage requirements and will facilitate an appropriate transition to the heritage item at 1 Station Street West, as required under Draft Clause 7.16 Opportunity Sites.

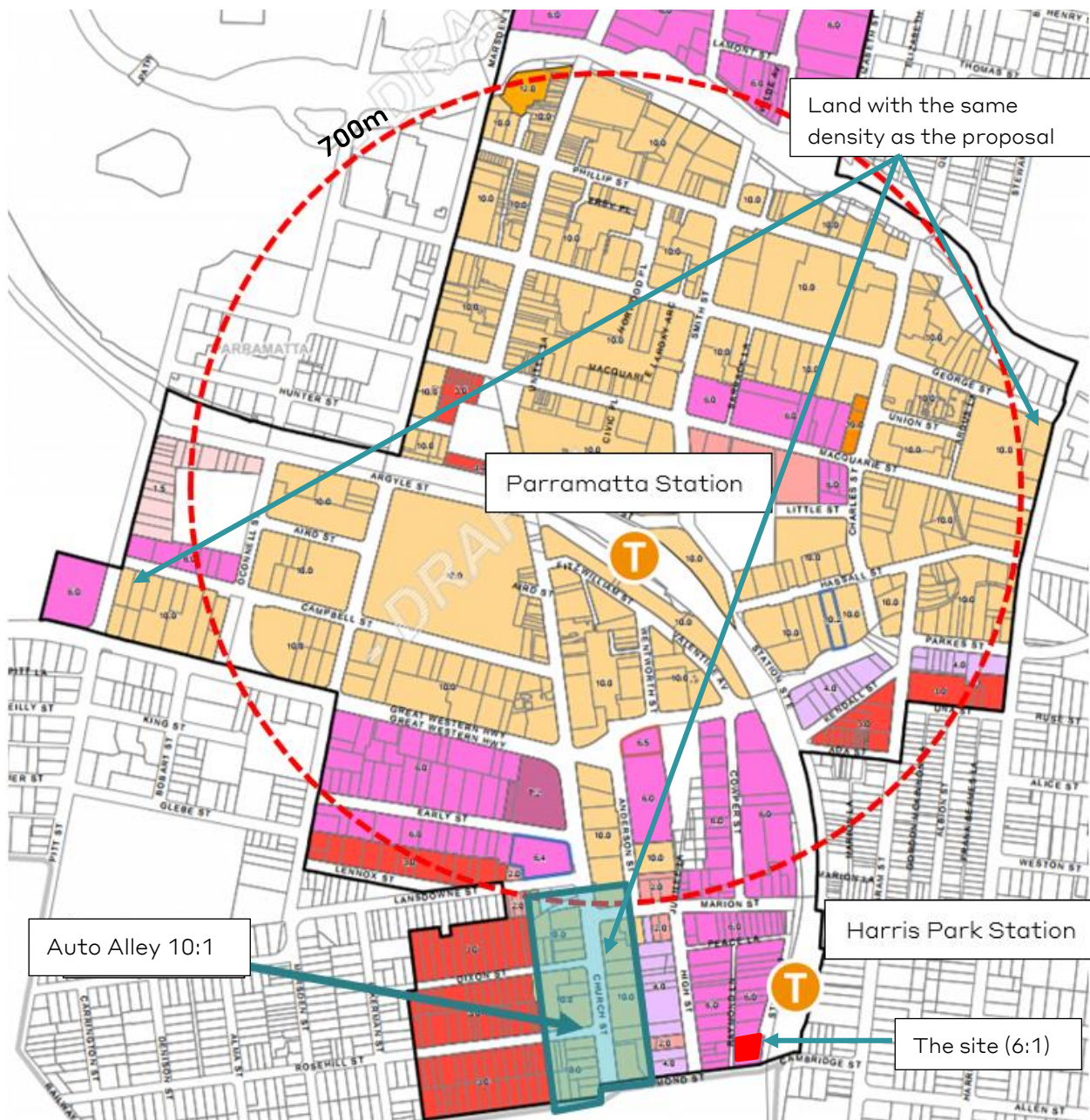
The letter outlined that the urban design assessment submitted with the Planning Proposal identified the same opportunity site criteria for development in the Station Street precinct (Refer to **Figure 6** above). Accordingly, it was suggested to Council that the precinct may be considered as 'opportunity site 2' and permit additional FSR from the mapped incentive FSR of 6:1 up to 10:1, provided the opportunity site criteria are met.

## 5.1 Height and Density located at Station

We note that Council has raised concern over the proposed location of density outside of the CBD core. However, we disagree with this assessment as the CBD Planning Proposal identifies a number of areas on the southern and western edge of the CBD that are proposed to have the same density as the proposal. As illustrated in **Figure 7** below, the Auto Alley Precinct is located on the southern edge of the CBD and comprises a large area of land with high density zoning, being the same as that proposed for the site.

The densities proposed in the CBD include the B3 zoned Commercial Core with commercial office developments having no maximum FSR control over an area of approximately 20Ha, the Auto Alley Precinct and opportunity sites allowing mixed use developments with FSR controls up to 15:1. In this regard the proposed development, being a single site with a maximum FSR control of 10:1 plus design excellence bonus, will not undermine the hierarchy of densities in the Parramatta CBD. We consider that the merit of a density of 10:1 on the subject site is clear.





**Figure 7- Location of density within Parramatta CBD**

Source: CBD Planning Proposal Incentive FSR map

We consider that the proposed location of increased density adjacent to Parramatta's second railway station is a sustainable and appropriate location. The proposed density on the site is commensurate with many fringe areas of the CBD, many of which do not have proximate access to public transport, as illustrated in **Figure 7** above. We consider the provision of increased density adjacent to existing high capacity transport infrastructure achieves the objectives of the various strategic planning documents including A Plan for Growing Sydney, Greater Sydney Regional Plan and the Draft Central District Plan for the Sydney's Central City and will ensure that well located land isn't locked up with low intensity development.

## 6.0 Voluntary Planning Agreement

The Planning Proposal is accompanied by an agreement to enter into a Voluntary Planning Agreement (VPA) that will deliver a significant public benefit and community infrastructure. The public Benefits offered by Greenrock in the VPA offer include:

1. Construction works for the creation of a linear park along Station Street to be known as Harris Park, as designed by Context and provided with the Planning Proposal documents. The linear park represents a substantial public benefit and contribution values in excess of \$1,000,000;
2. Embellishment of the Linear park along Station Street with landscaping, street furniture, CCTV cameras, LED lighting and wayfinding signage;
3. The registration of an easement or encumbrance across the portion of the site fronting Station Street to form part of the Linear Park and be accessible to the public;
4. The provision and management of publicly accessible car sharing spaces above that of Council's DCP requirement. A letter of offer from GoGet is provided attached to this letter.
5. Maintenance and ongoing restoration works to the heritage item at 1 Station Street in accordance with the Conservation Management Plan for the item; and
6. Greenrock would also consider a monetary contribution to the upgrade and embellishment of toilets and amenities at Rosella Park.

Greenrock note that Council have endorsed the preparation of a Draft CBD Infrastructure Strategy that provides for a Phase 1 Value sharing rate of \$150/sqm, to be applied to the amount of additional floor space gained through the CBD Planning Proposal or site specific Planning Proposals. Greenrock express their support for this policy position that will result in a contribution of approximately \$2,208,000 to be allocated to the items identified above or other Council nominated projects in the CBD.

## 7.0 Avoidance of Precedent

We understand that Council have raised concern over creating an undesirable precedent should the site achieve, or should Council support the proposed FSR of 10:1. We consider that there are sufficient and significant factors that would prevent the occurrence of an undesirable precedent in this instance, including:

- The site and the Station Street study area is located adjacent to a train station and as such is in a unique location.
- The catchment served by the Harris Park station is located partially outside of the CBD boundary and as such has little opportunity to service new development as a result of the growth of the CBD. In this regard, the site and the Station Street study area are located directly adjacent to the station and are located within the CBD boundary.

- Following the exhibition of the CBD Planning Proposal it is considered unlikely that any rezoning of the land surrounding the site will occur within 5 years as the Department of Planning's *Guide to Preparing LEP's* states that there will be a presumption against a Rezoning Review that seeks to amend LEP controls that are less than 5 years old, unless the proposal can clearly meet the Strategic Merit Test;
- There are very few development sites in the CBD located within 100m of a train station that meet the same site criteria (1,800m<sup>2</sup> area and 40m frontage);
- Other street blocks in the area are affected by heritage controls or building height and FSR restrictions. As identified in the Hector Abrahams Study there are no heritage constraints on the site; and
- The site is an amalgamated land holding and achieves a large, 1,800m<sup>2</sup> site area and 40m wide frontage.

## 8.0 Political Donations

A political donations form is included in the application form attached to this letter.

## 9.0 Conclusion

The proposal clearly demonstrates strategic merit by assisting in growth of Sydney's central city by locating additional density adjacent to a CBD train station. The proposal also demonstrates site specific merit through a large site area and frontage, ability to transition to heritage and ability to achieve a high level of residential amenity. The site is unique and has significant merit as it:

- Is one of only a very few number of development sites in the CBD located within 100m of a train station that meet the same site criteria (1,800m<sup>2</sup> area and 40m frontage);
- Is located within 100m of an existing train station;
- Will provide an efficient and slender residential building envelope that demonstrates a high level of residential amenity;
- Achieves Council's criteria for additional density, being 1,800m<sup>2</sup> area, 40m frontage and appropriate transition to heritage;
- Is located in an area that does not contain heritage restrictions with respect to building heights or FSR;
- And promotes sustainable development that is consistent with strategic planning policy.

We consider that the information contained within this letter is sufficient to progress the rezoning review. Should you wish to discuss this further please do not hesitate to contact me at [aszczepanski@ethosurban.com](mailto:aszczepanski@ethosurban.com) or 9956 6962.

Yours sincerely,

A handwritten signature in black ink, consisting of a stylized 'A' followed by a long horizontal stroke.

**André Szczepanski**

Principal

9956 6962

[aszczepanski@ethosurban.com](mailto:aszczepanski@ethosurban.com)