



# WILLOW TREE PLANNING

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Department of Planning, Industry and Environment  
Locked Bag 5022  
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**Attention: Strategic Planning Department**

**RE: REQUEST FOR REZONING REVIEW  
PLANNING PROPOSAL FOR HEALTH-ORIENTATED VERTICAL VILLAGE  
93 BRIDGE ROAD, WESTMEAD (SP 31901)**

Dear Sir / Madam,

This Letter has been prepared by Willowtree Planning Pty Ltd on behalf of 93 Bridge Road Pty Ltd atf Bridge Road Unit Trust, to support a request for a Rezoning Review. The subject Planning Proposal seeks amendment to *Parramatta Local Environmental Plan 2011* (PLEP2011) to include additional building height, additional floor space ratio (FSR) and an Additional Permitted Use (APU) for short-term accommodation within the R4 High Density Residential zone (the balance of proposed uses are already permitted with consent in the R4 zone). The land subject to the Planning Proposal is described as 93 Bridge Road, Westmead (SP 31901).

The proposed rezoning intends to facilitate the future development of the site for Australia's first vertical health village, co-locating residential accommodation (including Build to Rent (BTR)) and allied health uses within a high density, mixed use 'micro hub'.

The Planning Proposal seeks an FSR up to 6:1 and a building height up to 132m (40 storeys) pursuant to an 'added value proposal'. In direct response to the advice of Council (and as previously provided to Council for assessment), provision has also been made for a 'base case' incorporating a minimum 4.5:1 FSR and 78m building height (22 storeys).

Notwithstanding that the base case accords with the recommendations previously provided by Council, the significant reduction in the scale and density of the built form results in a conservative, residential-led scheme.

By contrast, the added value proposal has been demonstrated to exhibit significant strategic and site-specific merit, and to respond to Government's mandate for Westmead as established in the draft *Westmead 2036 Place Strategy* (draft Place Strategy). The added value proposal would enable the creation of a genuine health-oriented vertical village for Westmead, optimising the innovation and public benefit delivered for the precinct. Key benefits of the added value proposal include:

- 7,500m<sup>2</sup> more commercial floor space (precinct-supportive uses);
- 374 more jobs (243% increase);
- 144 total more residential units to increase housing supply;
- 402 BTR units to address housing diversity and affordability;
- 223 more units for students, NDIS and medical motel;
- 750m<sup>2</sup> more community space (400% increase);
- Fully-funded creek crossing.



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The Planning Proposal demonstrates how the subject site may optimise its contribution to the Government vision for Westmead, through the added value proposal.

It is noteworthy that key anchor institutions within the Precinct have expressed support for the proposal. In addition, NSW Treasury has demonstrated support for the proposal, evident through the inclusion of the Proposal Summary (refer Attachment D) in the NSW Treasury Investor Pack for Westmead.

However, the Planning Proposal was initially lodged with City of Parramatta Council (and a circa \$100,000 fee was paid) on 20 March 2019 and has been in the system for over two (2) years. An amended Planning Proposal was submitted to Council on 23 December 2020, responding to the advice provided by Council. A meeting was requested with Council to discuss the amended Planning Proposal, however the return email from Council on 29 January 2021 refused the meeting request.

The Planning Proposal was then referred to the Planning Development Unit (PDU) on 11 March 2021 and was accepted for 'case management' in acknowledgement that the Planning Proposal had been 'stuck in the system'. On 08 April 2021, the PDU issued email correspondence recalling that Council is unwilling to consider an FSR over 2:1 for the site and that a further meeting in relation to the Planning Proposal is unnecessary. The PDU stated that its role was not to overturn Council's decision.

A more detailed matrix documenting the chronology of the Planning Proposal, is provided on the final page of this Letter.

Despite Council's opposition, the Planning Proposal is considered to exhibit significant strategic and site-specific merit, as confirmed through the detailed assessment carried out in the preparation of the Planning Proposal (and the subsequent amendments which were submitted to Council in direct response to their recommendations).

Specifically, the proposal is consistent with the *NSW State Priorities, Directions for a Greater Sydney*, the *Greater Sydney Region Plan* (Region Plan), the *Central City District Plan* (District Plan), the draft *Place Strategy for Westmead* (draft Place Strategy), *Parramatta Local Strategic Planning Statement* (LSPS), *Parramatta Local Housing Strategy* (LHS) and *Parramatta Community Strategic Plan* (CSP). The proposal reflects the vision for the Greater Parramatta Growth Area, Greater Parramatta to Olympic Peninsula (GPOP) and the Westmead Health, Education and Innovation Precinct. To demonstrate that the proposal satisfies the strategic merit test and has site-specific merit, an assessment has been carried out in accordance with Step 2 of the Department of Planning, Industry and Environment (DPIE) *A Guide to Preparing Local Environmental Plans*.

In particular, the proposal would provide significant public benefit through the injection of housing supply and diversity (including BTR, student accommodation, key worker housing, and NDIS and family accommodation), employment generation, precinct-supportive uses, a community centre, publicly accessible open space, new streets and through-site links, and a new creek crossing. The inclusion of the type and broad mix of residential accommodation proposed, would both complement and enhance the orderly functioning of the overall Health, Education and Innovation Precinct in which both the Federal and State Governments have significant investment. Most importantly the people of NSW, especially those in remote and rural communities together with those less fortunate, would benefit enormously from the services afforded to them by this development. Indeed, it is this outcome that has been the driver behind the proposal's Proponent and has remained inviolate throughout our brief.

Key economic benefits of the proposal as a \$500 million plus project (upon completion), include the following:

- 1,853 (573 direct) full time equivalent (FTE) short term construction jobs;
- 170 (98 direct) ongoing operational FTE jobs across a range of industries including:
  - Sectors hit hard by the COVID pandemic (retail, accommodation and food);
  - Key strategic sectors including health and social services;
- Attraction and retention of best in breed talent in the medical and educational fields through the accommodation offering (short and long term rental tenure and a variety of unit typologies);

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- More affordable start-up space within innovation / community hub would increase jobs across the Precinct;
- Jobs created by the project would contribute to an innovative job eco-system to create a more attractive and resilient Precinct over the medium to long term.

It is noteworthy that this is a shovel-ready project, and therefore the economic and public benefits would start to be realised imminently upon approval.

Full details of the Planning Proposal are provided in the following enclosed documents:

- Attachment A – Rezoning Review Application Form
- Attachment B – Planning Proposal, as submitted to Council:
  - Original Council Submission (20 March 2019):
    - Planning Proposal Report
    - Appendix 1 Survey Plan
    - Appendix 2 Urban Design Report
    - Appendix 3 Transport Assessment
    - Appendix 4 Economic Assessment
    - Appendix 5 Civil Engineering and Infrastructure Assessment Report
    - Appendix 6 Draft Voluntary Planning Agreement Offer
    - Appendix 7 Strategic Merit Test
    - Appendix 8 Peer Review
    - Planning Proposal Application Form
    - Owners Consent
  - BTR Addendum (24 April 2020):
    - Planning Addendum
    - Urban Design Report
  - Amended Planning Proposal (23 December 2020):
    - Cover Letter
    - Planning Proposal Report
    - Appendix 1 Survey Plan
    - Appendix 2 Urban Design Report
    - Appendix 3 Transport Assessment
    - Appendix 4 Economic Assessment
    - Appendix 5 Civil Engineering and Infrastructure Assessment Report
    - Appendix 6 Strategic Merit Test
    - Appendix 7 Site-Specific DCP
    - Appendix 8 Draft Voluntary Planning Agreement Offer (submitted to Council 22 February 2021)
- Attachment C – Council Correspondence:
  - Email to Council (dated 15 February 2019) outlining that the Planning Proposal documentation is being progressed in accordance with Council's preferred design option as communicated in the meeting of 30 January 2019.
  - Email from Council (dated 07 March 2019) providing preliminary feedback from the meeting of 30 January 2019.
  - Email from Council (dated 01 April 2019) confirming receipt of Planning Proposal and fee, and advising of Council's moratorium on Planning Proposals.
  - Email to Council (dated 08 August 2019) confirming that the Planning Proposal is not to be withdrawn and requesting continued collaboration with Council whilst the LSPS and LHS are finalised.
  - Email to Council (dated 14 July 2020) providing notes from the meeting of 18 June 2020.
  - Roberts Day Meeting Notes (dated 14 July 2020) from the meeting of 18 June 2020.
  - Email from Council (dated 23 July 2020) providing notes from the meeting of 18 June 2020.
  - Council Meeting Notes (dated 10 July 2020) from the meeting of 18 June 2020.
  - Email from Council (dated 11 January 2021) confirming receipt of the Amended Planning Proposal on 23 December 2020.

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- Email from Council (dated 22 February 2021) confirming receipt of the Amended VPA on 22 February 2021.
- Email from Council (dated 29 January 2021) reinforcing previous advice and refusing a meeting until Council has adopted a position on the draft Westmead Place Strategy.
- Attachment D – Correspondence from other Government Agencies:
  - Email to DPIE (dated 04 April 2020) providing a project overview and requesting fast-tracking.
  - Email to NSW Treasury (dated 04 April 2020) providing a project overview and requesting fast-tracking.
  - Project Summary, included by NSW Treasury in their Investor Pack for Westmead.
  - Priority Project Fast-Track Submission (dated 19 May 2020), including Cover Letter and Economic Impacts Statement.
  - Email from PDU (dated 29 January 2021) inviting submission of the Planning Proposal.
  - PDU Submission (dated 11 March 2021), including Cover Letter.
  - Email from PDU (dated 08 April 2021) recalling that Council is unwilling to consider an FSR over 2:1 and that a further meeting is unnecessary. The PDU stated that its role was not to overturn Council's decision.
- Attachment E – Justification to the Strategic and Site-Specific Merit Tests
- Rezoning Review Application fee

The enclosed documents are considered to suitably justify the amendment of PLEP2011 to include additional building height, additional FSR and an APU for short-term accommodation, on the site.

It is therefore recommended that the Planning Proposal is supported and that the necessary steps are pursued to enable it to proceed to Gateway Determination under Section 3.34 of the *Environmental Planning and Assessment Act 1979*.

Yours Faithfully,



Chris Wilson  
Managing Director  
Willowtree Planning Pty Ltd

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### MATRIX OF PLANNING PROPOSAL CHRONOLOGY

Table 1. Chronology of Events	
Date	Action / Event
10 December 2018	<p>Parramatta City Council adopted a resolution to the effect that Council would not progress any new, site-specific Planning Proposal that sought an increase in residential density in areas outside of Parramatta Central Business District (CBD), until such time that Council had completed the LSPS and LHS.</p> <p>The moratorium would not preclude the <i>lodgement</i> of a Planning Proposal, but would mean that Council would not progress its assessment.</p> <p>The moratorium was <i>not</i> endorsed by DPIE.</p>
30 January 2019	<p>Meeting with Council attended by the project team and key Council staff including Michael Rogers (Land Use Planning Manager), Jonathon Carle (Land Use Planning Manager within CBD) and Jan McCredie (Urban Design Manager).</p> <p>A Strategic Positioning Paper and Urban Design Presentation were presented to Council at this time, outlining the concept and demonstrating the strategic merits of the project based on its significant contribution to the Westmead Health, Education and Innovation Precinct.</p>
01 February 2019	<p>Meeting with DPIE attended by the project team and Anne-Maree Carruthers (Director, Sydney Region West).</p> <p>Likewise, this meeting focused on the significant merit and strategic justification for the proposal in light of its contribution to the Westmead Health, Education and Innovation Precinct.</p>
07 March 2019	<p>Written feedback received from Council, advising that Council would not be able to assess the Planning Proposal at this time given the moratorium, but acknowledging the desire to lodge the Planning Proposal in the context of the upcoming election.</p>
20 March 2020	<p>Planning Proposal lodged with Council.</p> <p>Receipt of the Planning Proposal and fee was confirmed by Council, however correspondence also confirmed that Council could not progress their assessment at this stage owing to the moratorium.</p>
06 August 2019	<p>Meeting with DPIE to raise the profile of the Planning Proposal.</p> <p>DPIE clarified that unless a Rezoning Review is pursued, the Planning Proposal rests with Council.</p>
06 August 2019	<p>Meeting with Council attended by the project team and key Council staff including Robert Cologna (Acting Land Use Planning Manager) and Jonathon Carle (Land Use Planning Manager within CBD).</p> <p>The moratorium was again cited as precluding the commencement of Council's assessment. It was however requested that Council engage in some discussion around the Planning Proposal.</p>
08 August 2019	<p>Email to Council confirming the Planning Proposal <i>not</i> to be withdrawn and requesting Council's collaboration.</p>

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Table 1. Chronology of Events	
Date	Action / Event
31 October 2019	Follow-up email to Council (given lack of any previous response) confirming meeting minutes and again requesting Council's collaboration.
06 November 2019	<p>Correspondence received from Council reiterating the moratorium.</p> <p>Council Officers reviewed their position based on the announcement of the Metro station location in Westmead. Correspondence was received outlining that Council consider that the announcement does not provide sufficient strategic justification to support the proposed density.</p> <p>In November 2019, the location of Sydney Metro was confirmed to be located further north of the existing Westmead train station, again further solidifying the suitability of the site for the proposed additional density and APUs to support the Westmead Health and Education Precinct.</p>
11 November 2019	Submission to Council relating to the draft LSPS, and demonstrating the alignment of the Planning Proposal with the LSPS.
18 December 2019	Submission to the Greater Sydney Commission (GSC) relating to the Draft Greater Parramatta and Olympic Peninsula (GPOP) Place-Based Infrastructure Compact (PIC) model. The submission demonstrated how the Planning Proposal, although site-specific, aligns with LGA-wide and region-wide strategies.
09 March 2020	<p>The Agenda for Council's Meeting of 09 March 2020 referenced the moratorium and confirmed that endorsement was never received from DPIE.</p> <p><i>The period for the application of the resolution has now expired. Council officers consider that it is not necessary to extend the application of this resolution at this point in time, given the following:</i></p> <ul style="list-style-type: none"> <li><i>The Draft LSPS and Draft LHS were exhibited last year and a report on the Draft LSPS is on this Council meeting agenda with a report on the Draft LHS to be prepared within the next couple of months;</i></li> <li><i>The DPIE has advised Council officers that notwithstanding that Council's LSPS is still in draft form, it has been exhibited and it is good practice for a Draft LSPS to be considered when assessing any site-specific Planning Proposal prior to them coming into effect. In this regard, Council's LSPS is an important strategic document that will be used to shape the City's future planning controls and infrastructure contributions plans. As such, Proposals to change planning controls from proponents will be tested against the LSPS.</i></li> </ul> <p>Accordingly, the moratorium was understood to no longer stand, thereby removing the restriction to the assessment of the Planning Proposal.</p>
31 March 2020	<p>Council's LSPS came into effect.</p> <p>Council's LHS remained in draft form at this time.</p>
04 April 2020	Roberts Day briefing note to Alex O'Mara at DPIE, highlighting the State-significant merits of the proposal and emphasising the project's delivery on key NSW Government priorities for the Precinct and NSW Treasury's 2040 Economic Blueprint. An expedited approvals pathway was requested.



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Table 1. Chronology of Events	
Date	Action / Event
04 April 2020	Roberts Day briefing note to Jared Kendler at NSW Treasury, highlighting the State-significant merits of the proposal and emphasising the project's delivery on key NSW Government priorities for the Precinct and NSW Treasury's 2040 Economic Blueprint. An expedited approvals pathway was requested.
24 April 2020	BTR Addendum submitted to Council together with an updated Urban Design Report. The Addendum package highlighted the significant benefits of BTR and the amplified merits of the Planning Proposal through the inclusion of BTR.
29 April 2020	Roberts Day phone discussion with Amanda Harvey (DPIE Executive Director), relating to the acceleration process and merits of the Planning Proposal.
18 May 2020	Email to Council requesting meeting to discuss the BTR amendment and collaboratively progress the Planning Proposal.
19 May 2020	Fast-track submission to DPIE requesting inclusion of the Planning Proposal in the second tranche of the acceleration program. The submission clearly outlined the achievement of the fast-track criteria, including significant job creation, 'shovel-readiness', and major public benefits associated with delivery of health services, community facilities, transport links, BTR, key worker housing, medi-motel, NDIS housing, student accommodation, other diverse housing supply, public open space, stormwater infrastructure and creek rehabilitation.
01 June 2020	Follow-up email to Council requesting meeting and continued collaboration.
18 June 2020	<p>Meeting with Council, during which Council communicated support for the overall vision and strategic merit of the proposal.</p> <p>Council requested that the Planning Proposal be amended to achieve a height and density comparable or less than the Deicorp development (approximately 4.5:1 FSR).</p> <p>Other matters which Council requested further consideration of included connectivity to the north, the tenure and accessibility of the proposed public open space, and the public benefit offer.</p> <p>At the conclusion of the meeting, it was agreed between Council and the project team that the next step would involve the preparation and presentation to Council of three (3) concept options addressing these matters. The preferred concept would then be agreed and would form the basis of an amended Planning Proposal.</p>
28 August 2020	<p>Meeting with Council, at which time two (2) concept options were presented to Council.</p> <p>Council communicated support the overall vision, the mix of uses and the public benefit contribution. Council however suggested that the density would need to be reduced to less than 2.5:1.</p> <p>Written notes or minutes were never provided by Council.</p>
14 December 2020	<p>Draft Place Strategy published online by DPIE for public exhibition.</p> <p>The amended Planning Proposal (lodged to Council on 23 December 2020) demonstrated how the subject site may optimise its contribution to the draft</p>

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Table 1. Chronology of Events	
Date	Action / Event
	Place Strategy's vision for Westmead.
23 December 2020	<p>Amended Planning Proposal submitted to Council, incorporating both a 'base case' and an 'added value proposal', as follows:</p> <ul style="list-style-type: none"><li>▪ Base case: minimum 4.5:1 FSR and 78m building height (22 storeys).</li><li>▪ Added value proposal: FSR up to 6:1 and a building height up to 132m (40 storeys).</li></ul> <p>The base case directly responded to the advice provided by Council in the meeting of 18 June 2020, at which time Council recommended that the FSR should be reduced to approximately 4.5:1.</p>
29 January 2021	<p>Correspondence from Council Officers (responding to requests from the project team for a meeting with Council to discuss the amended Planning Proposal) <i>denied</i> the opportunity for a meeting.</p> <p>Council stated that the amended Planning Proposal documentation had been reviewed, and that Council's previous advice stood and would continue to do so unless Council adopts an alternative position when considering the report on the draft Place Strategy.</p>
29 January 2021	Correspondence from the PDU invited the submission of the Planning Proposal.
22 February 2021	Amended VPA Offer submitted to Council, for inclusion in the amended Planning Proposal package.
11 March 2021	Submission to PDU, and immediate acceptance by the PDU for 'case management' in acknowledgement that the Planning Proposal had been 'stuck in the system'.
08 April 2021	Email from PDU recalling that Council is unwilling to consider an FSR over 2:1 and that a further meeting is unnecessary. The PDU stated that its role was not to overturn Council's decision.