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The General Manager
City of Parramatta
PO Box 32
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Attention: Strategic Planning Department

RE: PLANNING PROPOSAL TO AMEND PARRAMATTA LOCAL ENVIRONMENTAL PLAN 2011 FOR ADDITIONAL BUILDING HEIGHT, ADDITIONAL FLOOR SPACE RATIO AND ADDITIONAL PERMITTED USE FOR SHORT-TERM ACCOMMODATION AT 93 BRIDGE ROAD, WESTMEAD

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, and forms an appendix to the Planning Proposal for the amendment of *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 on the site. 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 residential accommodation and allied health and education uses. The Planning Proposal seeks to optimise its contribution to Westmead Health and Education Precinct and Innovation District through a 6:1 FSR and 132m building height (40 storeys). However, a base case for a 4.5:1 FSR and 78m building height (22 storeys) has also been conceptualised to demonstrate a lower-scale option.

The majority of land uses intended for the site are already permitted with consent in the relevant R4 High Density Residential zone pursuant to PLEP2011 or *State Environmental Planning Policy (Infrastructure) 2007* (ISEPP). The exception is the short-term accommodation proposed to accommodate NDIS patients, families visiting children or other relatives in hospital, as well as visiting nurses, doctors, medical experts and professors. Accordingly, an APU is proposed for *Hotel or Motel Accommodation* and *Serviced Apartments*.

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's (DPIE) *A Guide to Preparing Local Environmental Plans*. It is noted that whilst not required for the purpose of submitting the Planning Proposal to Council, the merit test is considered relevant for the purpose of providing additional strategic justification for the proposal.

Yours faithfully,

Chris Wilson
Managing Director
Willowtree Planning

STRATEGIC MERIT TEST

Amendment to Parramatta Local Environmental Plan 2011 for Additional Building Height, Additional Floor Space Ratio and Additional Permitted Use for Short-Term Accommodation
93 Bridge Road, Westmead (SP 31901)

Table 1. Strategic Merit Test	
Merit Criteria	Merit Assessment
The Planning Panel or Commission will undertake an assessment to determine whether the proposal:	
a) has strategic merit as it is:	
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; or	<p>The proposed rezoning is consistent with the Greater Sydney Region Plan and Central City District Plan.</p> <p>In accordance with the Region Plan, District Plan and draft Westmead Place Strategy's vision for the Greater Parramatta to Olympic Peninsula (GPOP), the Westmead Health and Education Precinct and the 30 minute city, the development of the site would see intensified housing development concentrated in an existing urban area supported by major employment opportunities, public transport, services and the major infrastructure investment committed for the region in association with the Growth Infrastructure Compact.</p> <p>Further, the range of allied health and education-related uses nominated for inclusion on the site directly reflect the 'active ecosystem' described by the Plan as characterizing successful innovation districts. Specialist medical facilities, housing (including BTR (as part of the added value proposal), key-worker and student housing), temporary accommodation for NDIS patients and short-term accommodation for visitors, are all key to the growth and development of the Westmead Innovation District.</p> <p>Being identified within the GPOP Urban Renewal Corridor, the site is ideally located for new housing. New housing on the site will support the need for additional housing supply in Sydney in accessible locations close to places of employment and established infrastructure. Through the delivery of up to 514 dwellings (under the added value proposal), the proposal would also contribute to meeting supply targets, placing downward pressure on prices to improve affordability, and diversifying housing choice. A range of unit sizes as well as BTR housing would assist in accommodating a variety of price-points and meeting the needs of Sydney's diverse and growing population.</p> <p>In addition to providing traditional and BTR residential apartments, the proposal would deliver student housing, temporary NDIS patient accommodation, short-term family accommodation and key-worker housing, thereby responding to the diverse housing needs of the community as</p>

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	<p>particularly associated with the Westmead Health and Education Precinct.</p> <p>Through the proposed high density development incorporating a range of allied health and education uses (including the proposed APU for short-term NDIS patient and family accommodation), new jobs would also be introduced on the site. Accordingly, the proposal would support additional economic activity, new employment opportunities and service provision. The suitability of the site for such economic uses owes to its proximity to Westmead Health and Education Precinct and Innovation District, public transport infrastructure, and population catchments (providing a local workforce and demand for the services offered).</p> <p>More detailed review and assessment of the proposed rezoning in light of the Greater Sydney Region Plan and Central City District Plan are provided in Section 4.1.1.3 and 4.1.1.4 of the Planning Proposal Report.</p> <p>Now also a relevant consideration, the <i>Westmead 2036 Draft Place Strategy</i> (draft Place Strategy) was placed on public exhibition on 14 December 2020. The draft Place Strategy establishes the vision for Westmead as <i>Australia's premier health and innovation district; an ecosystem for new discoveries, economic growth and global recognition Westmead will also deliver exceptional place outcomes for the Central River City, with enhanced heritage and environmental assets, activated places, connected communities and housing choice.</i></p> <p>Aligning with the vision of the draft Place Strategy, the proposal would deliver diverse new housing to augment choice and supply, activate the site and public domain through a variety of active uses and public spaces, and connect the local community to living, working, studying and socialising opportunities through co-location within the site and more broadly through close walking and cycling proximity to the balance of the Westmead precinct and major public transport.</p> <p>The draft Place Strategy includes a Structure Plan for Westmead, which identifies the site as 'existing residential'. Of note, the adjoining site to the north is identified 'mixed use (health focus)'. Whilst the Structure Plan reflects the existing situation of the site, it does not provide express guidance on the</p>

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	<p>future development. Liveability Direction 8 does however promote housing renewal of old building stock and revitalisation of existing residential areas. Further studies are to focus on housing intensification and diversification within 800m of Westmead Station and in proximity to open space amenity, to provide student accommodation, key worker, social and affordable housing. The scale of future housing development is to be informed by urban design studies, ensuring it respects solar access, views and vistas.</p> <p>Reflecting the 'residential' designation of the Structure Plan and aligning with Direction 8, the proposal would provide a diverse offering of residential accommodation including student accommodation, key worker housing and BTR. The proposed density of development is suitable for the site in light of the criteria under Direction 8, given it is situated within 800m walking distance of Westmead station and would incorporate new open space to create a highly amenable environment for the new community. The proposal has been informed by detailed urban design analysis (refer Appendix 2), which demonstrates that the proposal would suitably respect solar access, views, vistas and general amenity.</p> <p>The balance of the proposed precinct-supportive uses would provide a transition to the health-focused mixed use developments that are earmarked for the adjoining site to the north, and would also support the core vision for Westmead as a health and innovation district.</p> <p>To facilitate the renewal initiatives and actions, Westmead has been divided into sub-precincts. Each is defined by its own purpose and distinct character to create an integrated, coherent and sustainable community. The site is located within Sub-precinct 2 'Health and Innovation; Westmead's engine room'.</p> <p>In accordance with the outcomes for Sub-precinct 2, the proposal would support core health and innovation uses with diverse housing within high density mixed use development that encourages activity through active ground floor uses and a high quality public domain, with co-located social infrastructure, services and open spaces. The proposed permeable network of shared streets, pedestrian lanes and open spaces would promote walkability, cyclability and connect the green grid.</p>

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	<p>Overall, the proposal would support the vision, directions and purpose of the draft Place Strategy, as it would provide residential and complementary allied uses within a high density, mixed use micro hub within 800m walking distance of Westmead train station and inclusive of new open spaces, an activated public domain and a permeable street network.</p> <p>In particular, through the added value proposal, the site's contribution to the Westmead 'engine room' would be optimised, with increased housing supply and diversity through the inclusion of BTR, and significantly increased public benefit through an enhanced breadth and quantum of precinct-supportive uses including NDIS patient and family accommodation, medical motel, student accommodation and a community facility. A fully-funded creek crossing would significantly improve connectivity through the precinct. Accordingly, the added value proposal actualises the draft Place Strategy.</p> <p>As detailed in Part D of the Planning Proposal Report, the proposal is also consistent with other applicable State, regional and local strategic plans, including the NSW State Priorities and Directions for a Greater Sydney, as well as the strategic objectives for the Greater Parramatta Growth Area, GPOP, the Westmead Precinct, Parramatta Light Rail and Sydney Metro West.</p> <p>Overall, consistent with strategic policy for urban renewal corridors and health, education and innovation precincts generally, and GPOP and Westmead specifically, the proposal would create opportunities for diverse new housing, allied health and education facilities, new jobs, local services and an activated public domain, combining to revitalise strategically-located land in immediate proximity of major public transport.</p>
Consistent with a relevant local strategy that has been endorsed by the Department; or	<p>The proposed rezoning is consistent with local strategic plans including Parramatta Council's <i>Local Strategic Planning Statement</i> (LSPS), <i>Local Housing Strategy</i> (LHS) and <i>Community Infrastructure Strategy</i>.</p> <p>For the purpose of the LSPS and LHS, Westmead is identified as a Strategic Centre and one of 16 Growth Precincts.</p>

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	<p>The majority of housing growth is to occur in designated Growth Precincts, close to public transport and other services, and primarily (73%) within the GPOP corridor. 4,500 new homes would be distributed in Westmead (resulting in 8,000 total homes in Westmead by 2036). The LHS clarifies that this represents capacity in Westmead for land that is <i>yet</i> to be rezoned or where <i>further</i> part rezoning is to occur.</p> <p>Accordingly, the proposal would align with the rezoning that is required within the Westmead Growth precinct in order to realise the capacity and deliver the dwellings forecast by the LSPS and LHS.</p> <p>Further, the LSPS states that the workforce is projected to grow from 164,000 in 2016 to 250,000 in 2036, with 60% of new jobs to be in centres including the Westmead Health and Education Precinct. In total, 28,700 additional jobs (resulting in 48,500 total jobs) are targeted for Westmead by 2036.</p> <p>In accordance with the LSPS and LHS Priorities and targets, the proposal would focus new housing and jobs in the designated Westmead Growth Area and Strategic Centre, which in turn forms part of the GPOP corridor. A diversity of housing types and sizes would be incorporated to meet community needs into the future. Through the co-provision of precinct-supportive uses, open spaces and walking and cycling links, the proposal would contribute to the community infrastructure and recreation opportunities promoted by the LSPS and LHS. Accordingly, the proposal would sequence the new development with infrastructure, to support connectivity and access to services, jobs, transport, community facilities and open space.</p> <p>Additionally, Westmead forms one of the high growth areas identified by the Community Infrastructure Strategy. The proposal would deliver an extensive range of social infrastructure, including many of the types of social infrastructure expressly identified as being needed for Westmead. These include short-term visitor accommodation, key-worker housing, new streets, pedestrian through-site links, cycle lanes and footpaths, and publicly-accessible open space. The added value proposal would significantly increase the social infrastructure and public benefit contribution through 7,500m²</p>

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	<p>more precinct-supportive uses, BTR housing, 223 more units for students, NDIS and medical motel, 750m² more community space (400% increase), and a fully-funded creek crossing.</p> <p>In conjunction with the above-listed extensive offering of social infrastructure, a draft VPA Offer would be prepared in discussion with Council.</p>
Responding to a change in circumstances, such as the investment in new infrastructure or changing demographic trends that have not been recognized by existing planning controls.	<p>The site falls within the catchment for the new Parramatta Light Rail and Sydney Metro West, with stations to be located within 800m walking distance of the site. Additionally, the implementation of City of Parramatta Council's Green Grid would increase permeability in the local area, decrease distances to public transport nodes, and promote an improved walking and cycling experience.</p> <p>Accordingly, in the future the site will benefit from enhanced accessibility by active transport links and public transport. Given this significantly augmented accessibility, the site is ideally located for new, higher density residential, allied health and education uses.</p> <p>The site is also located within the Westmead Health and Education Super Precinct, GPOP, the Greater Parramatta Growth Area, and an urban renewal corridor designated for transit-oriented development.</p> <p>Key focus areas for GPOP include (as relevant to Westmead):</p> <ul style="list-style-type: none"> ▪ Growth Infrastructure Compact to support the delivery of social and economic infrastructure; ▪ Parramatta Light Rail and Sydney Metro West as catalysts for new businesses, housing choice, education, research, entertainment and tourism; ▪ Employment growth and diversity; ▪ Walkable places. <p>Other objectives and strategies focus on the role of Westmead as an internationally-competitive health, education, research and innovation precinct.</p> <p>Through the provision of significant new housing supply (including BTR, key-worker and student housing as well as short-term NDIS and visitor accommodation) on the subject site in immediate</p>

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	<p>proximity to Westmead Health and Education Precinct (yet on land historically developed and zoned for residential purposes), the proposal would positively contribute to the overall productivity of the precinct.</p> <p>Similarly, residential accommodation and complementary uses on the subject site would contribute to the creation of the 30 minute city owing to the proximity of the site to major employment opportunities, public transport, services and the major infrastructure investment committed for the region in association with the Growth Infrastructure Compact.</p> <p>Further, the range of allied health and education-related uses nominated for inclusion on the site directly reflect the 'active ecosystem' described by the Region Plan as characterizing successful innovation districts. Specialist medical facilities, housing (including BTR, key-worker and student housing), temporary accommodation for NDIS patients and short-term accommodation for visitors, are all key to the growth and development of the Westmead Innovation District.</p> <p>As detailed in the Economic Assessment (Appendix 4), each of the use components proposed for the site responds to an identifiable market demand, and is consistent with the locational attributes of the site and the policy support for a more diverse mix of uses to be incorporated into the Westmead District.</p>
<p>The Planning Panel or Commission will undertake an assessment to determine whether the proposal:</p> <p>b) having met the strategic merit test, has site-specific merit, having regard to:</p>	
The natural environment (including known significant environmental values, resources or hazards)	<p>The site is not identified in proximity of any area of biodiversity and accordingly the proposal would not exhibit any adverse impact on the natural environment or other resources. Rather the proposal relates to a site that has been historically developed, is highly disturbed, comprises limited existing vegetation, and forms part of an established urban area.</p> <p>The site's redevelopment would create opportunities for development designed in accordance with the principles of Environmentally Sustainable Development (ESD), new public streets, pedestrian links and open spaces, community facilities and other uses that support the Westmead Health,</p>

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	<p>Education and Innovation District, the co-location of housing, jobs and services, and the promotion of active transport use.</p> <p>Landscaping across the site would significantly enhance the amenity of the site, contribute to the fine grain and human scale of the streetscape, boost the urban tree canopy, positively contribute to microclimate, biodiversity and habitat, connect to existing green corridors to support the expansion of green links through Westmead and Parramatta, and optimise opportunities for social interaction amongst residents, workers, visitors and the wider community.</p>
The existing uses, approved uses and likely future uses of land in the vicinity of the land subject to a proposal	<p>The concept design has been informed by detailed site analysis and consideration of the surrounding context in order to provide an optimal development outcome that capitalises on the strategic potential of the land, uplifts the surrounding public domain and provides a high level of amenity.</p> <p>The site and surrounding area are zoned for a combination of high rise residential development, education establishments with no height limit and health facilities with no height limit. Currently, the area incorporates a range of building heights generally ranging from three (3) to 16 storeys and land uses that would be described as relatively intense. Land to the immediate north is considered to exhibit significant redevelopment potential, and given it is unconstrained by any maximum height or FSR controls would likely be developed for higher densities and high rise built form.</p> <p>The building height, density and range of uses proposed for the subject site therefore present the opportunity to create a transition between existing multi-storey residential flat buildings to the south and west, the anticipated future high rise development on land to the north, and the Health, Education and Innovation Precinct.</p> <p>The stepped design of the concept development would concentrate the tower elements in the northern portion of the site, adjacent to the future development site considered likely to accommodate high density built form. Lower building elements and publicly-accessible open space would be provided adjacent to the southern boundary where existing residential development comprises 16 storeys. The design of the built form would therefore provide an</p>

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	<p>effective transition in height and scale and protect the amenity of existing residential development to the south, existing and proposed open spaces and the new residential dwellings to be provided on the site.</p> <p>In summary, the proposal would introduce a transitional development that complements the range of surrounding land uses, integrates with the variety of built form densities in the general area, responds to the strategic location of the site and leverages new infrastructure investment (namely Parramatta Light Rail and Sydney Metro West).</p> <p>The proposed height, FSR and range of land uses also reflect strategic directions for urban renewal and transit corridors, education and health precincts, innovation districts, and development in the vicinity of new transit nodes.</p>
The services and infrastructure that are or will be available to meet the demands arising from the proposal and any proposed financial arrangements for infrastructure provision.	<p>The site is serviced by existing infrastructure that is capable of servicing higher density residential, allied health and education development. In particular the site is highly accessible by public transport, being within 800m walking distance of Westmead train station and Wentworthville train station. Bus stops directly adjacent to the site frontage provide services to Parramatta Station, Merrylands Station and Blacktown Station. A number of T-ways are located along surrounding streets, including Hawkesbury Road, Darcy Road, Mons Road, Briens Road and Old Windsor Road. The area is also serviced by major road infrastructure.</p> <p>Resulting from the proximity of the site to public transport, active transport networks and services, the site has been awarded a walkscore of 71 ('very walkable- most errands can be accomplished on foot') and a transit score of 64 ('good transit- many nearby public transportation options').</p> <p>Importantly, in the future the accessibility and walkability of the site will be further enhanced through the delivery of Parramatta Light Rail and Sydney Metro West, both within approximately 800m walking distance of the site. The implementation of City of Parramatta Council's Green Grid would increase permeability in the local area, decrease distances to public transport nodes, and promote an improved walking and cycling experience.</p>

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	<p>As detailed in the Transport Assessment (Appendix 3), <i>the proposal is supportable on traffic and transport planning grounds and will not result in any adverse impacts on the surrounding road network or the availability of on-street parking.</i> Accounting for the estimated traffic generation volumes associated with the proposed development, SIDRA Analysis illustrates that the network is capable of accommodating the trips generated by the proposal under the existing conditions. Furthermore, it would not have a material impact on the operation of the network.</p> <p>The Transport Assessment also concludes as follows:</p> <p><i>Further, the location of the Site means that is ideally placed to encourage travel by sustainable transport and align with key strategic objectives to create a 30-minute city for the residents of Greater Sydney. Following the completion of PLR Stage 1 and other planned public transport improvements, the Site's connectivity would be further enhanced. The Proposal therefore represents the opportunity to create a development which aligns with strategic objectives but is also acceptable from a traffic and transport perspective.</i></p> <p>As described above, the proposal would deliver an extensive range of social infrastructure, including many of the types of social infrastructure expressly identified as being needed for Westmead by Parramatta Council's Community Infrastructure Strategy. These include short-term visitor accommodation, key-worker housing, new streets, pedestrian through-site links, cycle lanes and footpaths, and publicly-accessible open space. The added value proposal would significantly increase the social infrastructure and public benefit contribution through 7,500m² more precinct-supportive uses, BTR housing, 223 more units for students, NDIS and medical motel, 750m² more community space (400% increase), and a fully-funded creek crossing.</p>

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The above assessment demonstrates that the proposed rezoning for additional building height, additional FSR and an APU for short-term accommodation, to support a high density micro-hub on the site, exhibits strategic merit and site-specific merit.

The proposal is consistent with key strategic plans for the site, Westmead precinct, GPOP corridor, Central City district and Greater Sydney.

Importantly, the proposal complements the Westmead Health and Education Precinct and Innovation District, and responds to the growth forecast for Westmead and Greater Parramatta. Similarly, the proposal would leverage new investment in Parramatta Light Rail and Sydney Metro West and assist in the revitalisation of the area.

The future provision of high density residential, allied health and education development would be compatible with the natural environment, surrounding land uses and built form (existing and future), and infrastructure (existing and future).

It is therefore recommended that the Planning Proposal is supported by Council 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* (EP&A Act).

Yours faithfully,



Chris Wilson
Managing Director
Willowtree Planning