

22 December 2023

City of Parramatta Council

Attention: Mr David Birds

SITE SPECIFIC PLANNING PROPOSAL – 23-27 HAROLD STREET AND 53 SORRELL STREET, PARRAMATTA

The purpose of this letter is to:

- Clarify the status of the above planning proposal following the making of the SEPP that amends planning provisions in the vicinity of the subject site;
- Make a VPA offer in relation to Affordable Housing, as part of the planning proposal;
- Clearly set out the history of numerous planning processes for the above site, that have not resulted in any satisfactory planning or housing supply outcome;
- Confirm the demonstrable attempts by the owners to invest in and seek to deliver housing supply on the site; and
- To request that the City of Parramatta Council immediately progress the site specific planning proposal that accords with historic and current planning initiatives for the site and general area.

The Site and Background

A Site Specific Planning Proposal (SSPP) has been lodged in relation to 23-27 Harold Street and 53 Sorrell Street, Parramatta (see images below of the context and the site). Lodgement fees were paid to the City of Parramatta Council on 7 October 2022. It is relevant to note that the proposed density and height uplift only applies to 23-27 Harold Street, with the density controls of 53 Sorrell Street to remain unchanged. The dwelling (Currawong House) and grounds at 53 Sorrell Street is identified as a local heritage item in Schedule 5 of the Parramatta Local Environmental Plan, containing the 'Currawong House',

which is currently being used for commercial uses, with a small car park at the rear.

The planning proposal intentionally includes Currawong House to design and craft an outcome that is not only sensitive to Currawong House but gives rise to public benefits and includes principles that provide a model for how to deal with the transition of planning controls from Church Street (with its high density character and light rail presence) to Sorrell Street (with its heritage conservation area character).



Site: 23-27 Harold Street + 53 Sorrell Street





The SSPP proposes:

- A Maximum Building Height of 60m (NB the adjoining site to the west has a mapped Maximum Building Height of 80m).
- A Maximum Floor Space Ratio of 5:1 (NB the adjoining site to the west has a mapped FSR of 6:1).
- No change to the planning controls of 53 Sorrell Street.

This letter clarifies that a VPA offer is to accompany the SSPP, as set out further below.

Department of Planning Engagement


The project team has engaged with the Department of Planning and Environment in November this year and have been provided with correspondence encouraging continued working with the Council to progress the planning proposal for the site. The correspondence is attached to this submission.

Church Street North Planning Amendments

The project team has reviewed the recent rezoning of the Church Street North precinct, giving particular attention to the Hassell prepared “Church Street North Urban Design Study”.

The subject planning proposal is consistent with the key principles of the urban design study as follow:

1. The tallest building is located along and directly addressing Church Street. The adjacent 470 Church Street enjoys an FSR of 6:1 (6.9:1) and 80m (92m) and the subject proposal responds with a lesser density and height proposed.
2. The subject planning proposal contemplates a built form that is located further west on the land holding to provide an improved relationship to the eastern heritage area and successfully minimises visual impacts to the heritage conservation area to the east. This is consistent with the



espoused principle of locating the tallest portions of buildings furthest from the HCA.

3. The proposal is instrumental in providing a transition towards the east. The proposal successfully respects the heritage listed dwelling to the east of the site through provision of generous separation and intentional introduction of a landscaped break.
4. No impact on solar access to identified public spaces.
5. No impact on significant view corridors.

These matters are addressed and discussed in the submitted written planning proposal and urban design report.

VPA Offer

We write on behalf of our client to confirm their offer in association with the planning proposal.


The proponent offers the dedication of two x single bedroom unencumbered apartments to the City of Parramatta Council, to be included in the Councils Affordable Housing stock.

This offer is made on the basis of the height and FSR proposed. Any reduction in the height and FSR from that proposed invalidates the offer.

Site History

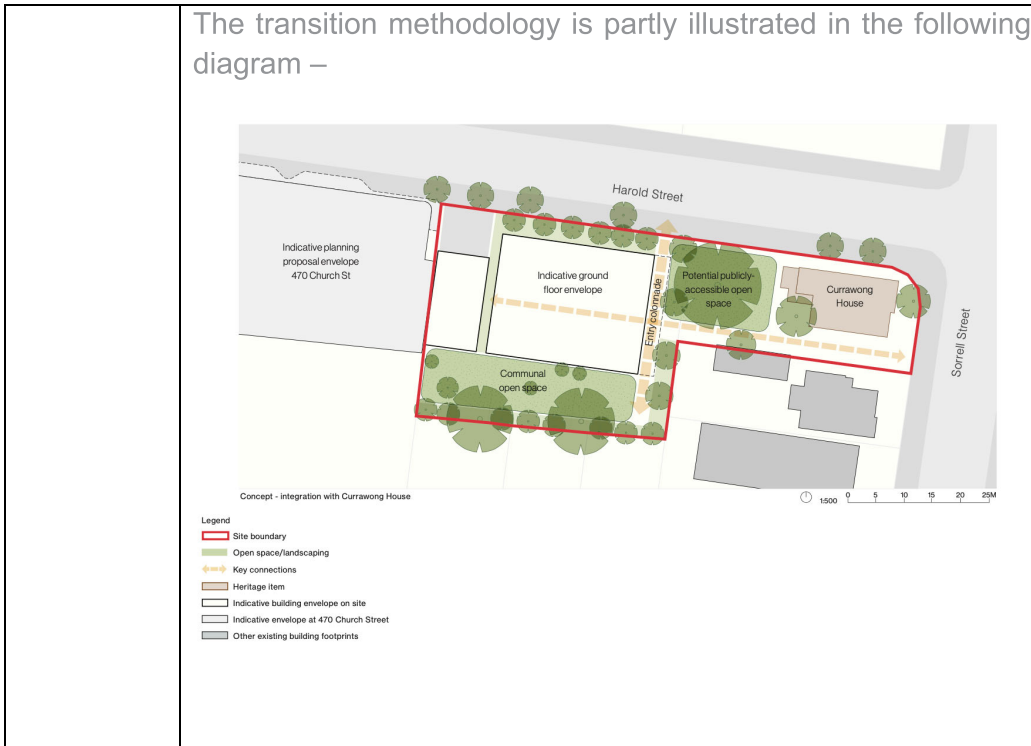
We provide the following history of the various planning proposals, applications and assessments that set out the need for a timely conclusion of the planning proposal as submitted.

The land has been the subject of numerous planning processes for over 8 years, and the planning status remains unchanged. The proponent has consistently sought to provide a positive outcome on the site, that has included significant expenditure and investment in site acquisition, a Design Excellence Competition, the preparation and lodgement of a Development Application, and a series of Planning Proposals. A summary of the plethora of planning processes is provided below, in relation to 23-27 Harold Street Parramatta.

2015 April	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.
2015 November	SSPP lodged for 23-27 Harold Street seeking 6:1 FSR consistent with CBD Planning Strategy.
2015 December	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)
2016 April	Council adopts 6:1 FSR for the site.
2017 June	<p>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:</p> 
2017	City of Parramatta Council endorse the SSPP, to be forward to the Department for issuing of Gateway (6:1 and 70m)

July	
2017 September	Department of Planning issue Gateway Determination in support of the Harold Street SSPP with an FSR of 6:1.
2017 December	City of Parramatta Council endorse a draft DCP for the SSPP site.
2018 February	City of Parramatta Council endorse a Design Excellence Competition Brief and competition commences for the SSPP site.
2018 July	<p>Cox Architecture are announced as submitting the winning scheme, for a 25 storey building accommodating 124 residential apartments.</p> 
2018 December	Department of Planning issue Gateway Determination for Parramatta CBD Planning Proposal. The Gateway requires Council undertakes further consideration of “heritage interface areas”.
2019 January	Department of Planning issue Alteration of Gateway Determination for the Harold Street SSPP to extend the Gateway to September 2019.
2019 November	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.

2019 December	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.
2020 June	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.
2022 April	Plan Finalisation Report by Department of Planning for Parramatta CBD removes all land north of Parramatta River from the CBD PP.
2022 August	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.
2022 October	<p>Department of Planning announce that a North Parramatta Place Strategy will be prepared, led and funded by the Department.</p> <p>(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.)</p>
2023 October	<p>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.</p> <p>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.</p>



Despite some 8 years of studies; despite significant capital investment by the owners in acquisition of the land; despite endorsements of planning proposals for the land; despite adoption of DCP's for the land; despite the completion of Design Excellence Competitions for the land; and despite the lodgement of a complete Development Application for a 25 storey tower and 124 apartments; no planning controls have changed. No housing has been delivered.

We note that the following Heritage Reports support the redevelopment of land mid block between Church and Sorrell Street:

- December 2015 – Urbis – *Heritage Study – CBD Planning Controls* – prepared for the CBD Planning Proposal.
- August 2016 – NBRs+ Partners – *Heritage Issues Identification* – Heritage Report in support of SSPP for the subject site.
- June 2017 – Hector Abrahams Architects – *Heritage Study of Interface Areas* – prepared for the CBD Planning Proposal.

- August 2022 – Paul Davies Pty Ltd – *Consideration of Heritage Interface with the Sorrell Street HCA* – submitted in support of the SSPP.

It is relevant to note that as the site has been the subject of a design excellence competition, and as a development application has been previously fully documented and lodged with the City of Parramatta Council, the making of the planning controls proposed in the SSPP will allow for the refinement and lodgement of the Development Application immediately after the issuing of a Gateway, thereby ensuring the delivery of housing and affordable housing in a timely manner.

Conclusion

We seek Councils support of the planning proposal as submitted, and reporting to the LPP and the Council in the first quarter of 2024.

Regards

Adam Byrnes
Director
Think Planners Pty Ltd
PO BOX 121
WAHROONGA NSW 2076