

16 January 2024

Department of Planning, Housing and Infrastructure
Planning, Land Use Strategy and Housing

Attention: Jorge Alvarez

REZONING REVIEW 2023-37

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

INTRODUCTION

The purpose of this paper is to:

- 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;
- Clarify that the proposed rezoning is consistent with strategic planning initiatives for the site and surrounds and has implicit site specific merit, inclusive of careful consideration and response to the nearby heritage conservation area and heritage items; and
- To request that the Department issue a Gateway for the proposal that will allow the planning proposal to proceed to public exhibition.

THE PROPOSAL

The Planning Proposal relates to 23-27 Harold Street & 53 Sorrell Street, Parramatta, referred to within this document as the 'subject site'.

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

It is noted that the proposed density and height uplift will only apply 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 should provide a model and standard for assessment of other sites in the locale.

Relevantly and significantly, the subject site is situated adjacent 470 Church Street, which enjoys planning controls of up to 6.9:1 and 92m in height. A Design Excellence Competition has been undertaken on the site and a winning scheme endorsed.

It is noted that the Department and the Council previously supported a Planning Proposal that would provide an FSR of 6:1 plus a 15% design excellence bonus. At the time a Design Excellence Competition was undertaken, and Cox Architects were the winning competitors. The planning proposal for the site did not proceed when the Council determined to remove the R4 zoned land in the precinct from the broader Parramatta CBD planning proposal.

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

This Planning Proposal seeks to amend the Parramatta LEP 2011 to allow for the redevelopment of the site for the purposes of high-density development by:

- Amending the maximum height of buildings map to permit 60m
- Amending the maximum floor space ratio map to permit 5:1

The proposed height and FSR controls are inclusive of the Design Excellence Competition bonus.

THE SITE

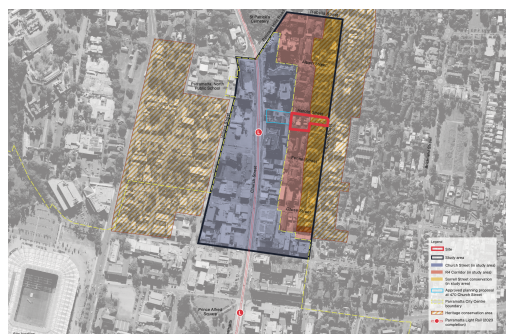
The site is located at 23-27 Harold Street and 53 Sorrell Street, Parramatta. The site comprises of 4 allotments and can be best described as an irregular shaped allotment with a frontage of 81.235m to Harold Street, splay frontage of 9.5m, a frontage of 12.375m to Sorrell Street and a site area of 2,423.4m² (by calculation).

The subject land is located within a 1.6km walking distance from Parramatta train station and a short walk from the Parramatta CBD. The site is also within close proximity to the Parramatta Light Rail, which is expected to open in 2023, and the Parramatta Metro Station which is expected to be operational in 2030. The site is within proximity to recreational activities, educational establishments and employment opportunities including:

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

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

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





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.

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.

SITE HISTORY

Unfortunately, this 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	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: <div data-bbox="662 1453 1098 1861" data-label="Image"> </div>

2017 July	City of Parramatta Council endorse the SSPP, to be forward to the Department for issuing of Gateway (6:1 and 70m)
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.
2021 February	Amendment No.47 to the Parramatta LEP 2011 is made that for the site immediately adjoining the subject site (at 470 Church Street) receives an FSR of 6:1 and HoB of 80m.
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>

	<p>The transition methodology is partly illustrated in the following diagram –</p> <p>Concept - integration with Currawong House</p> <p>Legend</p> <ul style="list-style-type: none"> Site boundary Open space/landscaping Key connections Heritage item Indicative building envelope on site Indicative envelope at 470 Church Street Other existing building footprints
2023 November	<p>The City of Parramatta Council at its Meeting on 20 November 2023 resolve to endorse a phased work program to review various “planning investigation areas”.</p> <p>The first investigation area relates to the land in the vicinity of the subject site. Council has noted in correspondence:</p> <p><i>Investigation and planning work has previously been completed on the North-East (NE) PIA as part of the NE PIA Planning Strategy. Phase 1 will commence further technical work and the preparation of a planning proposal to determine future planning controls for the area.</i></p> <p>This work is scheduled for early 2024.</p>
2023 December	<p>SEPP (Church Street North Precinct) is made and identifies increased FSR and Height controls for land along Church Street up to 5:1 and 63m (excluding design excellence bonus provisions).</p> <p>The land immediately west of the subject site is unchanged by the SEPP and remains 6:1 and 80m (excluding design excellence bonus provisions).</p>
2023 December	<p>The proponent makes a VPA offer to the Council in relation to the planning proposal.</p>

	The VPA comprises the dedication of 2 x one bedroom apartments to the Council to be incorporated into the Councils affordable housing stock, managed by a CHP. The VPA is relative to the proposal, and any change in the proposal would necessitate amending the VPA.
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The above catalogue of events is a telling story. 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; nothing has happened. No planning controls have changed. No housing has been delivered. Another planning investigation is scheduled for the precinct in 2024, yet multiple investigations to date have seen no practical change to the planning controls for the site.

The site is distinct from other land in the precinct as it is adjacent land already zoned for 6:1 and 80m and the planning proposal intentionally incorporates a transition strategy to Sorrell Street.

SUPPORTING HERITAGE STUDIES

We note that the following Heritage Studies and 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.

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

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

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

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

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

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

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

PLANNING PROPOSAL MERITS, INFRASTRUCTURE AND COMMUNITY BENEFITS

The Planning Proposal seeks to deliver the following key benefits:

- The planning proposal represents a considered response to the planning, design and heritage circumstances that are relevant to the broader area and also the local area. The planning proposal **is an exemplar** for how to manage the planning and heritage circumstances, in particular the way in which this site responds to the high density, activated and serviced Church Street corridor to the west of the site, and to the low density heritage conservation area to the east of the site.
- The Planning Proposal is **responsive to the immediate built form** and urban design factors/context that exist. The proposal seeks to provide an appropriate transition between high density residential and heritage, resulting in a “stepped” height transition from Church Street to the Sorrell Street Heritage Conservation Area and a clear distinction / buffer through the urban design methods of separation and open space.
- The proposed building envelopes by Architectus demonstrates a **high standard of design and amenity** can be achieved on the site. The scheme demonstrates Apartment Design Guide compliance separation between the development and adjoining sites. The scheme has been informed by several years of urban design commentary, studies and advice, much of which has been prepared by the City of Parramatta Council.
- The concept plan proposes to relocate an existing at-grade parking area at the rear of 53 Sorrell Street to within the basement level of the subject site, to provide a potential publicly accessible landscaped open space, which will enhance the setting of the Currawong House, provide a **clear visual and physical separation to the heritage precinct and improve connectivity with the public domain**.
- The proposal delivers a **variety of housing opportunities** adjacent to the Parramatta CBD. This enables the opportunity to create a genuine 30-minute city where housing is well connected to public transport, health services, education services, employment, and recreational facilities.
- The proposal provides a **public benefit** in the form of a VPA offer of 2 x one bedroom apartments dedicated to the City of Parramatta Council affordable housing stock, to be managed by a community housing provider.

The subject land parcel is ideal to accommodate the proposed development as it is located within an accessible area and is consistent with the evolving character of developments within Parramatta. The proposal will allow for future residential accommodation in a location which is undergoing intensification, whilst respecting the Sorrell Street Heritage Conservation Area.

CONCLUSION

The 8 years of investment and the plethora of planning processes that the site has been subjected to is telling and there is no certainty that there will be any change to the inactivity. The City of Parramatta Council planning investigations will not necessarily translate into a planning proposal, nor is there any certainty about timeframes.

This planning proposal is responsive to established and immediate planning issues for the site and surrounds. It proposes a transition in form and scale, addressing heritage and urban design issues. It proposes a method of protecting the character of Sorrell Street. It proposes the delivery of housing. It is consistent with the planning intentions for the North Parramatta precinct, established in relevant planning documents. It has previously been supported by the City of Parramatta Council at 6:1 and 80m. It has a winning architectural design competition for the site. It has had a DA application prepared and lodged in full that was subsequently withdrawn at the request of Council, which can be speedily amended and lodged at an appropriate time during the rezoning process.

It is considered that the LEP amendments sought by the planning proposal will allow for the accelerated delivery of high-density residential development in an area which is well serviced by public transport and infrastructure and has been identified as a key urban renewal precinct in numerous studies at State and Local level. The planning proposal is considered to have strong strategic and site specific merits as articulated in the Planning Proposal document, all of which is based on a sound analysis of relevant planning considerations.

Having regard to the factors set out in this paper and the submitted supporting documents, a rezoning review is appropriate, and the issuing of a gateway fitting.

Regards

Adam Byrnes
Director
Think Planners Pty Ltd

Attachment 1 – Planning Proposal lodged 2022
Attachment 2 – Urban Design Report
Attachment 3 – Heritage Report
Attachment 4 – Traffic Report