

Planning Proposal to amend Parramatta Local Environmental Plan 2011

23-27 HAROLD STREET &
53 SORRELL STREET,
PARRAMATTA

AUGUST 2022



QUALITY ASSURANCE

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Address:	23-27 Harold Street & 53 Sorrell Street, Parramatta
Council:	City of Parramatta
Author:	Think Planners Pty Ltd

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INTRODUCTION

The purpose of this Planning Proposal is to explain the intended effect and provide a justification for a proposed amendment to the Parramatta Local Environmental Plan 2011 (Parramatta LEP 2011) as well as demonstrate the strategic merit of the amendment proceeding.

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 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 being undertaken on the site and a winning scheme endorsed.

The site is located within proximity of employment opportunities, educational establishments, recreational activities and public transportation within Parramatta CBD and Westmead Health Precinct.

This report takes into consideration the changing strategic context of the area, noting that the recently finalised Parramatta CBD Planning Proposal deemed that land north of the Parramatta River would not proceed with rezoning. Notwithstanding, there is demonstrative strategic merits to the proposal and a deep compendium of existing strategic planning documents that support a thorough assessment and support of the proposal.

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.

The proposed amendments to planning controls will facilitate the delivery of high quality development contributing to much needed housing supply within the strategic centre.

The Planning Proposal has been prepared in accordance with Section 3.33 of the Environmental Planning and Assessment Act 1979 and the Department of Planning and Environment's document Local Environmental Plan Making Guideline December 2021.

The Planning Proposal is supported by:

- Urban Design Report by Architectus.
- Heritage Report.
- Traffic Report.

Support for the Planning Proposal is sought; and the subsequent referral to the Department of Planning and Environment for Gateway determination and public exhibition.

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 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.

SITE AND LOCALITY DESCRIPTION

LEGAL DESCRIPTION

The subject site is legally defined as the following:

Legal Definition	
No. 23 Harold Street, Parramatta	Lot 3 DP18261
No. 25 Harold Street, Parramatta	Lot 4 DP18261
No. 27 Harold Street, Parramatta	Lot 5 DP18261
No. 53 Sorrell Street, Parramatta	Lot 1 DP19079



Source: TTPA Traffic Report

EASEMENTS OR RESTRICTIONS

There are no known easements or relevant restrictions for this site.

TOPOGRAPHY AND VEGETATION

The land has been developed for urban purposes for many years and vegetation remaining on the site is minimal. The tree at the rear of the heritage item is to be retained and considered in any future design.

EXISTING VEHICULAR ACCESS

At present each site benefits from a single access residential standard driveway.

ABORIGINAL HERITAGE

The subject site is not identified as containing Aboriginal heritage under the Parramatta LEP heritage map and is nominated under the Parramatta DCP as having low sensitivity to Aboriginal Heritage.

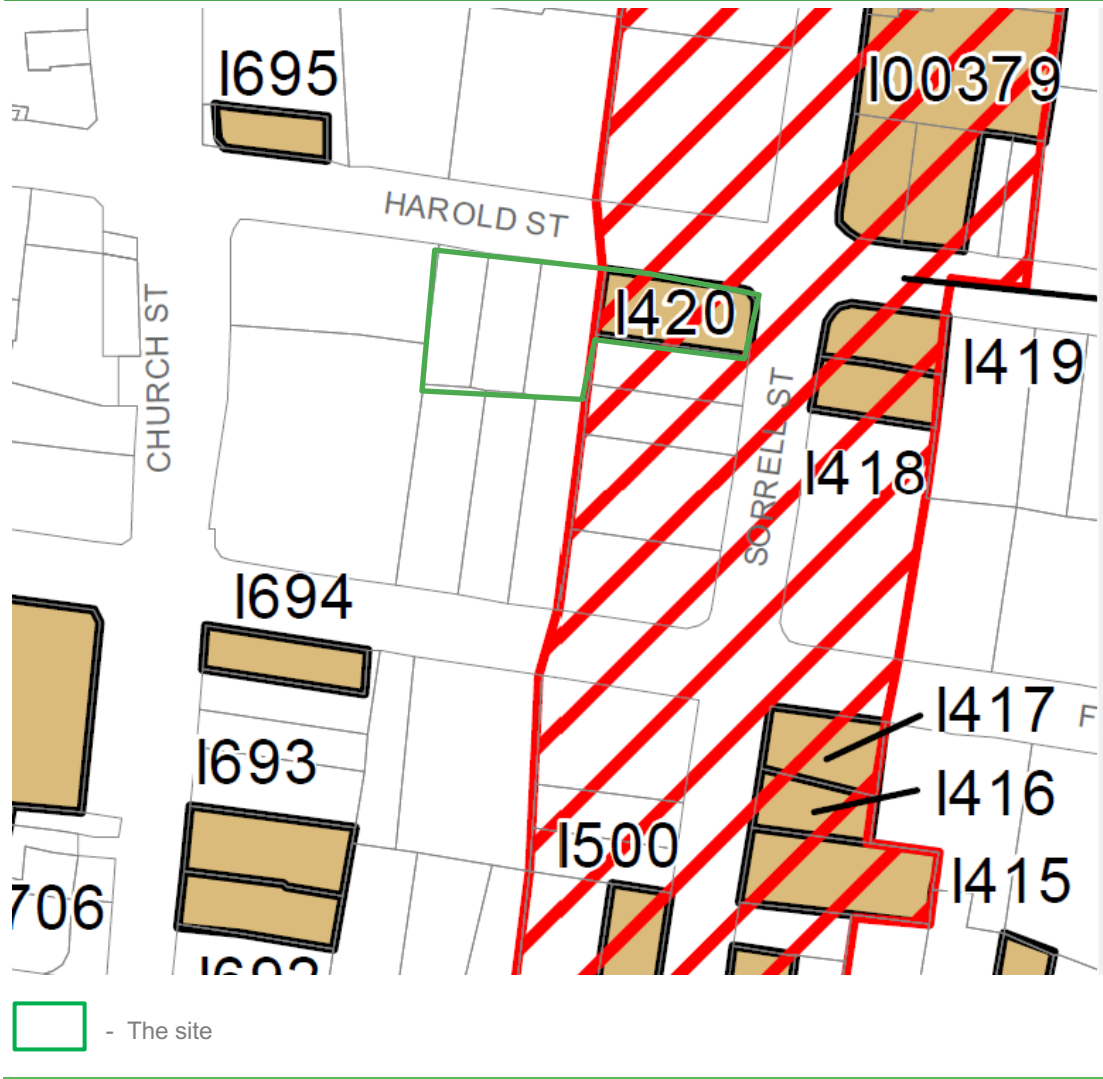
EUROPEAN HERITAGE

The subject site is comprised of 4 dwellings. The 3 lots located at 23-27 Harold Street are not heritage listed or in a conservation area. As mentioned earlier in this report, 53 Sorrell Street is identified as a local heritage item in Schedule 5 of the Parramatta Local Environmental Plan and is located within the Sorrell Street Conservation Area, as are the adjoining dwellings to the south of 53 Sorrell Street.

This is evident via heritage map extract provided below. As outlined in detail later in this report, the proposed density uplift is considered to result in an appropriate balance of strategic growth and retention of local heritage character.

Relevantly, the built form and reference design for this planning proposal has been informed by a series of principles and commentary of Paul Davies heritage architect. These principles have considered the most appropriate way to deal with the transition of height and density from the Church Street corridor to the west, to the heritage conservation area and items to the east. The planning proposal adopts the principles set out by Paul Davies and represents an exemplar response in the precinct.

Figure 1: Heritage Map Extract HER_009 (Source: Parramatta LEP 2011).



ARCHAEOLOGY

There are no known Items of Aboriginal Heritage located on the site. This is not a relevant consideration for the planning proposal and will be thoroughly investigated as part of any future development application process.

Opportunities to salvage archaeological items unearthed during demolition works are to be considered. If any items are found during the demolition and excavation, in the first instance opportunities to salvage and reuse the items are to be incorporated. When this is not practical or possible, an interpretation strategy is to be prepared.

DRAINAGE AND FLOODING

The subject site is not affected by flooding and this matter is appropriate for further civil consideration at the time of development application.

ACID SULFATE SOILS

The site is identified as containing Class 5 Acid Sulfate Soils as shown in the Parramatta LEP 2011. A preliminary site and soil assessment is to be conducted as part of the future development application.

SITE CONTEXT AND SITE ANALYSIS

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.



Figure 2: Site Aerial Context (Source: Six Maps).



 - Subject Site

Figure 3: Site Context (Source: Architectus).



CONTEXT IMAGES

The following photographs overleaf and within the following pages provide a visual understanding of the site and its relationship to the street.

Photograph 1: Shows the existing subject site as viewed from Harold Street.



Photograph 2: Shows the existing building at 470 Church Street, adjoining the site's western boundary. It is noted that the site has been rezoned with a maximum FSR of 6:1 and a maximum building height of 80m.





Photograph 3: Shows 53 Sorrell Street, which contains a heritage listed item known as Currawong House.



Photograph 4: Shows the current streetscape on the northern side of Harold Street.





Photograph 5: Shows the current streetscape on the western side of Sorrell Street.



Photograph 5: Shows the current streetscape of Sorrell Street, viewing southwards from the intersection at Harold Street.



LOCAL PLANNING FRAMEWORK

ZONING

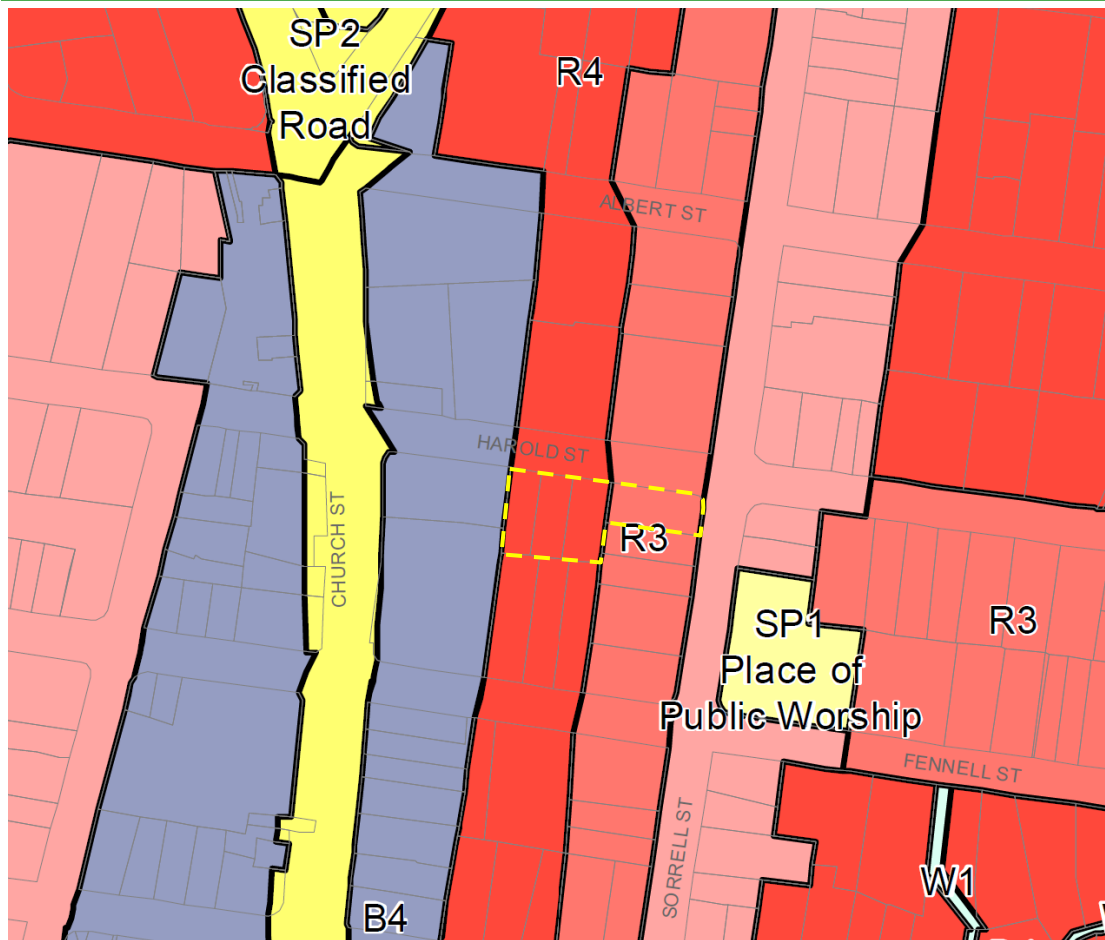
The land is currently zoned R4 High Density Residential, and this Planning Proposal does not seek to amend the existing zoning. It is noted that 53 Sorrell Street is zoned R3 Medium Density Residential, however, its heritage status ultimately will shape development outcomes on this lot, with the planning proposal intentionally embracing the retention and improved identification of Currawong House.

Parramatta Local Environmental Plan 2011 Zone R4 High Density Residential

Permitted with consent: Attached dwellings; Bed and breakfast accommodation; Boarding houses; Building identification signs; Business identification signs; Centre-based child care facilities; Community facilities; Dual occupancies; Dwelling houses; Educational establishments; Emergency services facilities; Environmental facilities; Environmental protection works; Exhibition homes; Flood mitigation works; Home-based child care; Home businesses; Hostels; Information and education facilities; Multi dwelling housing; Neighbourhood shops; Oyster aquaculture; Places of public worship; Public administration buildings; Recreation areas; Recreation facilities (indoor); Recreation facilities (outdoor); Residential flat buildings; Respite day care centres; Roads; Semi-detached dwellings; Seniors housing; Shop top housing; Water recycling facilities.

Among other things, a Residential Flat Building is permissible with consent in this zone. Figure 4 is an extract from the land zoning map from the Parramatta LEP 2011.

Figure 4: Extract from Parramatta LEP 2011 Land Zoning Map (Sheet LZN_009).

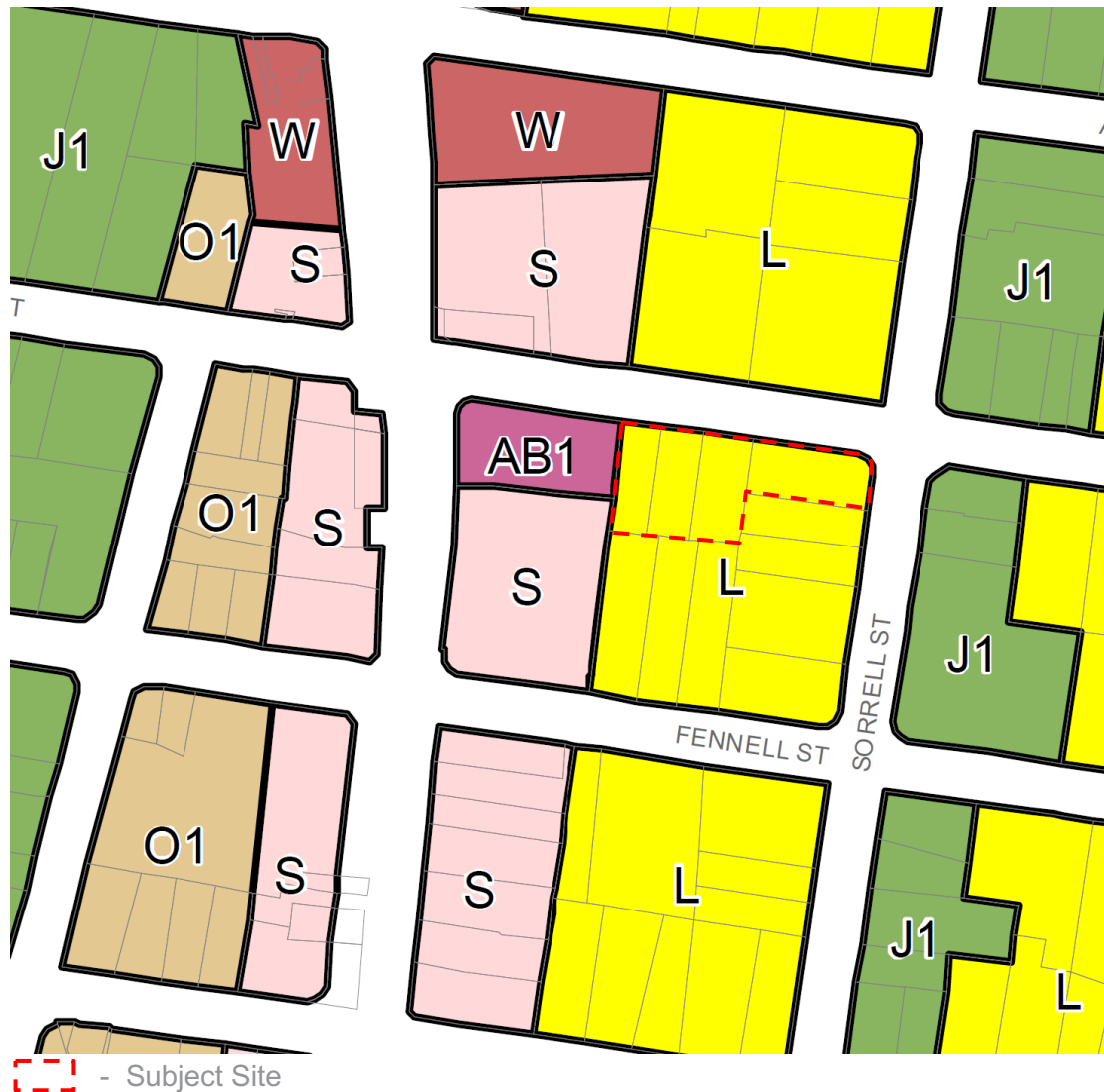


 - Subject Site

EXISTING BUILDING HEIGHT

The Height of Buildings Map for the Parramatta LEP 2011 indicates that the maximum building height permitted on the subject site is 11m. It is noted that the adjoining site to the west (470 Church Street) has a maximum building height of 80m (AB1). Figure 5 below is an extract from the Height of Buildings Map for Parramatta LEP 2011.

Figure 5: Extract from Parramatta LEP 2011 Height of Buildings Map Sheet HOB_009.



PROPOSED BUILDING HEIGHT

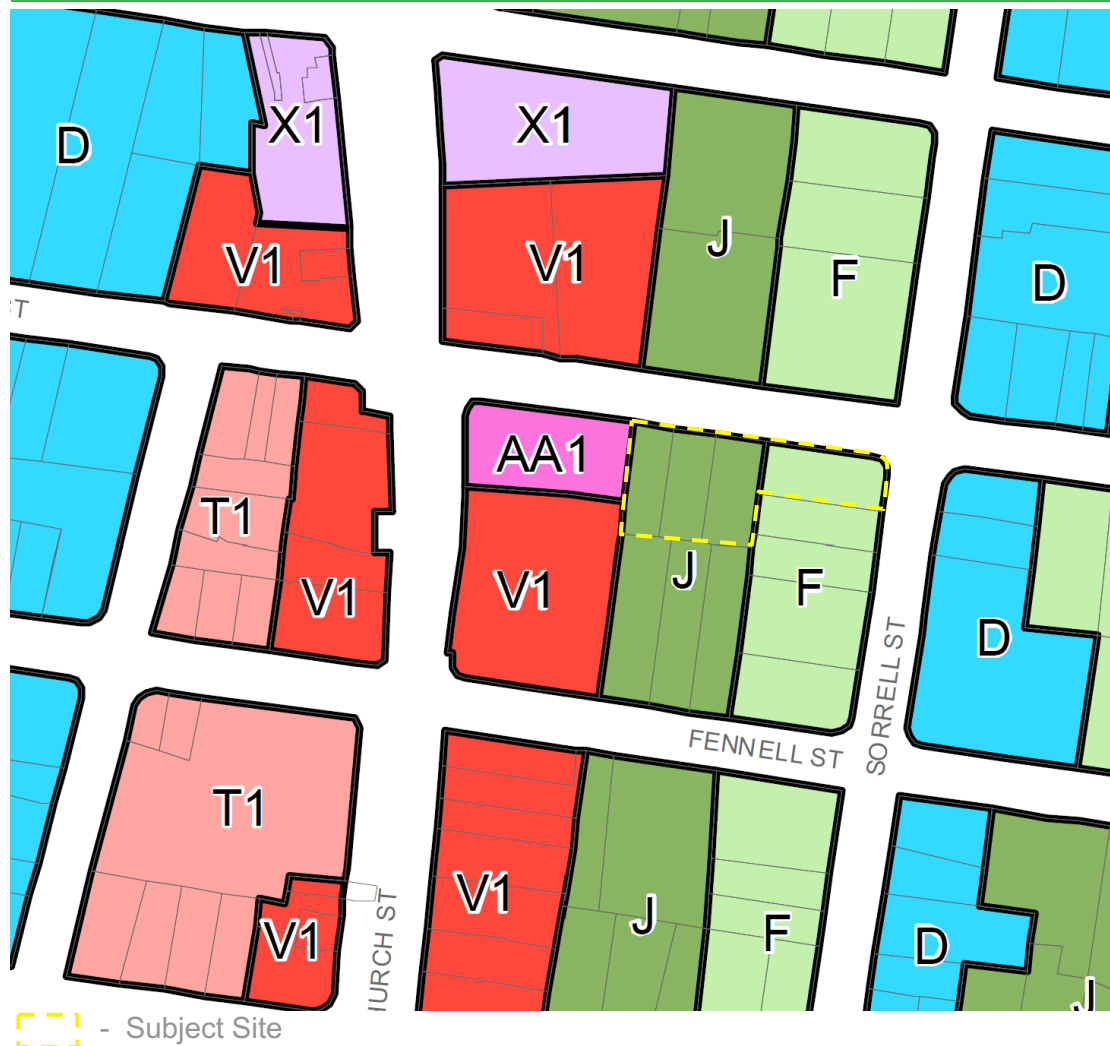
This Planning Proposal seeks to permit development with a height of up to 60m for 23-27 Harold Street, inclusive of the 15% design excellence bonus. It is noted that no changes to the height limit of 53 Sorrell Street are proposed.



EXISTING FLOOR SPACE RATIO

The current Floor Space Ratio Map for the Parramatta LEP 2011 indicates that the maximum floor space ratio for a building on the subject site is 0.8:1 for 23-27 Harold Street, and 0.6:1 for 53 Sorrell Street. It is noted that the adjoining site to the west (470 Church Street) has a maximum floor space ratio of 6:1 (AA1). Figure 6 below is an extract from the Floor Space Ratio Map for Parramatta LEP 2011.

Figure 6: Extract from Parramatta LEP Floor Space Ratio Map Sheet FSR_009.



PROPOSED FLOOR SPACE RATIO

This Planning Proposal seeks to amend the maximum floor space ratio to 5:1 for 23-27 Harold Street, inclusive of the 15% design excellence bonus. It is noted that no changes to the FSR limit of 53 Sorrell Street are proposed.

TECHNICAL STUDIES

URBAN DESIGN

The urban block within which the subject site is located has seen a significant amount of development activity and planning approvals over recent years since the introduction of the Parramatta CBD planning strategy. The precinct is undergoing an urban design renaissance led by the soon completion of the Parramatta Light Rail along Church Street and related public domain transformation.

The subject site is immediately proximate to a prime public transport corridor (Parramatta Light Rail) and also an extensive variety of sustainable transport options available, including heavy rail, Rivercat, buses, walking, cycling and the future Sydney Metro station. It is noted the locality has excellent connectivity with access to several key arterial / classified / key road networks including George Street, Church Street, the M2 and M4 Motorways, Pennant Hills Road, and James Ruse Drive.

Site Context

The merit of the proposed additional building height and density in this planning proposal must be seen in the context of surrounding development. This submission seeks a height limit of 60m, which will allow for a development of approximately 18 storeys. This height is considered to result in an appropriate balance between strategic growth, reinforcement of the Church St corridor character, and equally the preservation of nearby local character to the east. The development seeks to provide a transition between Church Street North, which has long been earmarked for higher density as part of the Parramatta CBD and numerous planning studies, and the Sorrell Street heritage conservation area, which will retain the existing density controls to preserve the heritage character of area.

Figures 7 & 8 overleaf represent the existing density controls of the locality and also an indicative density potential for the precinct.

Figure 7: Existing Density Controls (Architectus Urban Design Report).



 - Subject Site

Figure 8: Proposed Density Controls (Architectus Urban Design Report).



 - Subject Site

TRAFFIC

A traffic report has been prepared that is appropriate for the purposes of a Site Specific Planning Proposal. The report appropriately confirms the sites access to public transport, notably the Parramatta Light Rail. The report adopts the Parramatta CBD parking rates.

Relevant to this SSPP the report refers to the intention to include within the basement of 23-27 Harold Street the parking for Currawong House. This gives rise to the opportunity to ensure that the rear of Currawong House is sensitively treated with respect to its heritage status as discussed elsewhere in this report and referenced in the attached urban design study.

HERITAGE

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 contest 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.

PART 1 – OBJECTIVES OR INTENDED OUTCOMES

The objective of the Planning Proposal is:

To provide suitable building height and floor space ratio which facilitate urban renewal of the subject site along with the provision of high-density development commensurate with State Government planning strategies, whilst respecting the local character of the adjoining heritage conservation area. The Planning Proposal seeks to provide for a diversity of new housing within an ideal strategic location.

The planning proposal will contribute to the site's role within Parramatta CBD as a strategic centre that provides housing, jobs and services. The proposal will also contribute to the character of the locality by providing a “stepped” height transition between 470 Church Street and the Sorrell Street Heritage Conservation Area and a sensitive treatment at the ground plane that gives greater recognition to the heritage item Currawong House and the HCA. The proposal effectively separates from the HCA and in doing so, gives greater recognition to the adjoining item and area.

PART 2 – EXPLANATION OF PROVISIONS

The stated objective will be achieved by:

- Amending the Height of Building Map for Parramatta LEP 2011 to permit development with a maximum building height of 60m.
- Amending the Floor Space Ratio Map for Parramatta LEP 2011 to permit a maximum FSR of 5:1.

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

It is noted that the proposed density uplift will only apply to 23-27 Harold Street, with the density controls of 53 Sorrell Street to remain unchanged. 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 inclusion of Currawong House in the Planning Proposal allows for a better streetscape outcome and improved setting of the existing house.

PART 3 – JUSTIFICATION

The strategic merit test is demonstrated through a series of established questions set out in turn below.

SECTION A – NEED FOR THE PLANNING PROPOSAL

1. IS THE PLANNING PROPOSAL A RESULT OF AN ENDORSED LSPS, STRATEGIC STUDY OR REPORT?

YES

This planning proposal is undoubtedly the result of an extensive compendium of strategic planning studies, reports, and endorsed strategies. The site has long been identified as included within the Parramatta CBD and long established as a site where there is strategic merit for a change in planning controls. That the most recent urban design study commissioned by the Department of Planning (the Bennett and Trimble Report) raises questions about the right urban design controls for the site in no way sets aside, irradiates or diminishes the sites established position as having strategic merit for increased density. The location of this site and its renewal as a mixed use and housing precinct is supported by a long list of Strategic Planning documents that include:

- LUIP for Greater Parramatta – July 2017
- The Greater Sydney Region Plan – March 2018
- Central City District Plan – March 2018
- Greater Parramatta and Olympic Peninsula (GPOP) – October 2018
- Parramatta LSPS – March 2020
- Parramatta CBD Strategy and Planning Proposal (+ numerous supporting studies and reports) – Gateway 2018

Notwithstanding the established Strategic Merit of the site and the long list of endorsed and current strategic planning documents that identify the site and precinct for planning renewal, the Department of Planning in May 2022 when making the CBD PP chose to exclude land north of Parramatta River from the plan.

It is noted that the subject site had been removed from the CBD PP and identified as Planning Investigation Areas, to enable the Council to determine future planning controls based on a response predominantly to heritage areas east of the subject site, not due to any doubt about the strategic merit of the subject site being considered as a place to contribute to housing supply for the CBD.

As it could be mistakenly inferred that the decision of the Department means that land north of Parramatta River is no longer supported for urban renewal, it is appropriate to distil from the Plan Finalisation Report (April 2022) why the Department made the decision it did, and whether that alters the Strategic Merit of the subject site and

surrounds. The question arises – “does the decision of the Department invalidate the long established strategic planning analysis and endorsed strategies of both State and Local Government for the site and surrounds?”

The Plan Finalisation Report introductory Overview notes –

“Land north of the Parramatta River and the block located between the Parramatta River and Phillip Street, Wilde Avenue/Smith Street and Charles Street, herby referred to as the Phillip Street Block are recommended to be removed to allow further consideration of the built form outcomes and impacts on heritage, public open space, solar access and amenity.”

And subsequently in the discussion in relation to North Parramatta –

“In response to these concerns the Department recommends the area of land known as Parramatta North not be progressed as part of this plan. This allows further consideration to be given to the provision of development within proximity to the Parramatta Light Rail, transitions, solar access, lower building heights and FSR along the river, consideration of the adjoining HCA and heritage attributes generally, community concerns, amenity, and character. It is noted that Council is currently undertaking a review of planning provisions within the planning investigation areas and this may provide opportunity to review holistically providing a more complete picture of future character and built form transition.”

It is clear in an analysis of this report, and so too from subsequent engagement with the Department of Planning, that the finalisation of the CBD PP does not set aside years of strategic planning analysis and policy making for this part of Parramatta. The strategic merit of the site and surrounds is not dissolved. What is clear is that further work is required on the final form of the planning controls to respond to issues of character and heritage to arrive at planning controls that set the *“future character and built form transition”*. This SSPP embraces that task for the subject site. The methodology set out in this SSPP achieves the intentions of both the State and Local authorities and results in an exemplar for other land in the precinct.

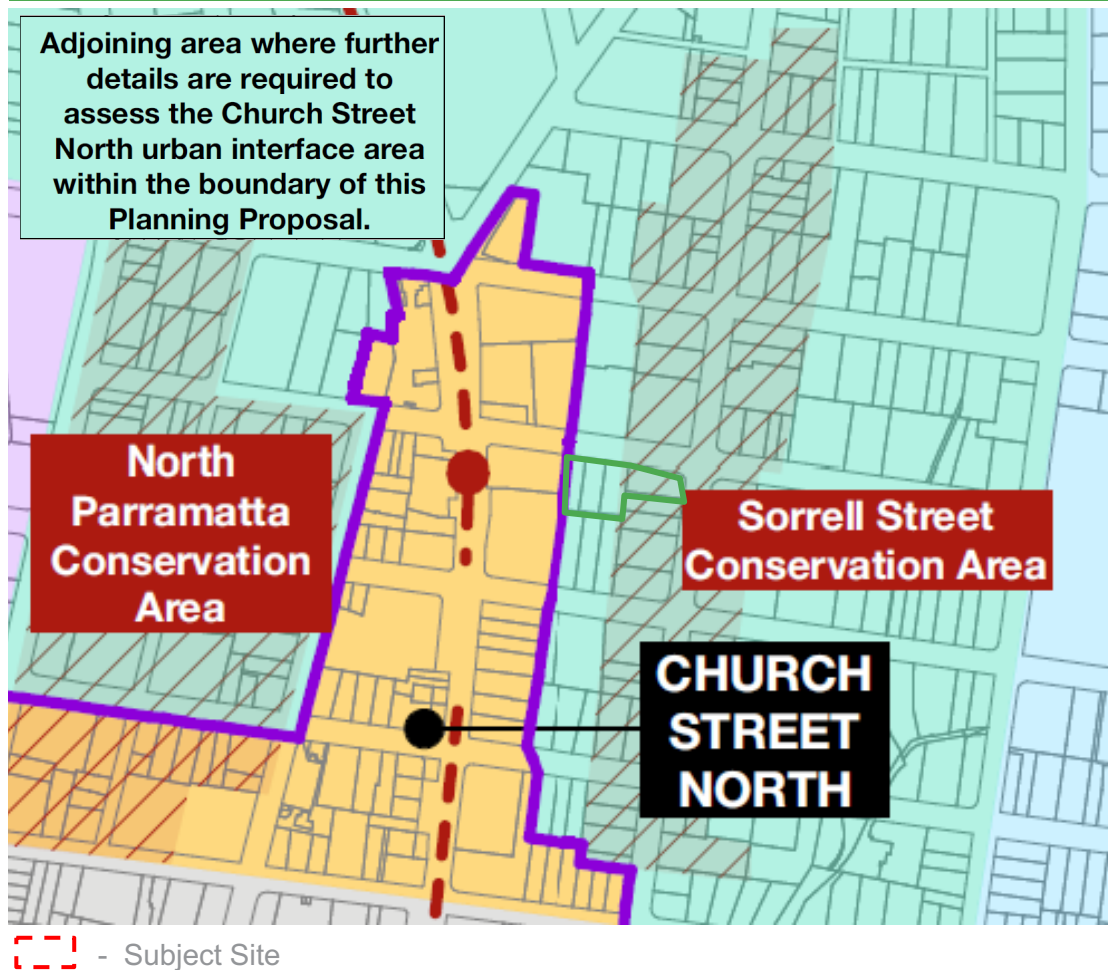
Bennett and Trimble – Independent Urban Design Rapid Assessment

In addition to the above commentary, we note that an Independent Rapid Assessment of the Parramatta CBD Planning Proposal was undertaken by Bennett and Trimble, which identified the site as an adjoining area where further information is required to assess the appropriate density. This Planning Proposal fills in some of this consideration.

An extract from the rapid assessment is provided below.



Figure 9: Church Street North Urban Interface Area (Bennett and Trimble Report).



The Rapid Assessment Report states that;

It will be critical to assess these controls in relation to these areas particularly where they mediate between the substantial heights along Church Street North and sensitive heritage conservation areas.

An expanded Planning Proposal Boundary should be explored to determine the best arrangement of density north of Parramatta River along the PLR corridor to take full advantage of this public transport initiative and to distribute growth and density in a more holistic and considered approach.

Develop or confirm the planning controls for the adjoining and wider urban areas to demonstrate a considered and integrated approach for development in the area around Church Street North and to enable an informed assessment of this Planning Proposal. This will include an understanding of proposed land uses, transitions in scale and character, overshadowing impacts, wider public domain and urban initiatives, the establishment of open space networks, and

consideration of a greater diversity in commercial and housing building typologies to differentiate these areas from the city centre.

As discussed elsewhere in this document, this SSPP provides a well reasoned urban design and heritage solution that is appropriate for the site and surrounds, and becomes an appropriate prototype for the broader area.

2 IS THE PLANNING PROPOSAL THE BEST MEANS OF ACHIEVING THE OBJECTIVES OR INTENDED OUTCOMES, OR IS THERE A BETTER WAY?

YES

It is considered that the Planning Proposal is the best means of achieving the stated objective of urban revitalisation of this land, for a number of reasons.

1. While the Department of Planning and the City of Parramatta Council have not an agreed pathway, milestones or funding mechanism for progressing the studies for North Parramatta a SSPP is entirely appropriate.
2. More specifically, for the subject site there is a long history of planning analysis of the site, previous support for a planning proposal, and a thorough understanding of the site by the City of Parramatta Council.
3. There are no commercial or practical impediments to the redevelopment of the site, and there is adequate information to undertake an assessment and make a proper determination. Accordingly, to delay consideration of a SSPP and await the completion of a study by the Council (estimate mid to late 2023) and then subsequent rezoning process of the precinct (estimate late 2024) is not necessary or equitable.
4. The unique circumstances of the site in relation to the adjoining approval for a building of 80m and 6:1 (+15% bonuses) is also a relevant factor in supporting a site specific planning proposal consideration.

The Planning Proposal is certainly the most efficient mechanism available for stimulating urban renewal and accelerating delivery of high-density housing in a manner consistent with the strategic directions established in the documents including A Metropolis of Three Cities – Greater Sydney Region Plan, the Central City District Plan, the Greater Parramatta and Olympic Peninsular Plan, the CBD Planning Proposal and the Parramatta CBD Strategy.

The Rapid Assessment of the Parramatta CBD Planning Proposal undertaken by Bennett and Trimble identified the site as an adjoining area where further information is required to assess the appropriate density. This Planning Proposal seeks to expedite the rezoning process of the site, stimulating urban renewal and accelerating the delivery of high-density housing.

SECTION B – RELATIONSHIP TO THE STRATEGIC PLANNING FRAMEWORK

3 WILL THE PLANNING PROPOSAL GIVE EFFECT TO THE OBJECTIVES AND ACTIONS OF APPLICABLE REGIONAL OR DISTRICT PLAN OR STRATEGY (INCLUDING ANY EXHIBITED DRAFT PLANS OR STRATEGIES)?

YES

The relevant strategic plans for consideration include the Metropolis of Three Cities – Greater Sydney Region Plan 2018 and the Central City District Plan 2018.

Metropolis of Three Cities

The Planning Proposal is aligned with these key themes, directions, metrics and objectives by:

1. Infrastructure and collaboration. The subject land is located adjacent to the Parramatta CBD. The site is located within easy access of exiting health services infrastructure as well as existing schools. The Parramatta CBD benefits from existing heavy rail and bus transport services. Parramatta Light Rail is under construction and the Metro rail is a committed infrastructure project.
2. Liveability. The architectural concepts provided with this Planning Proposal and the relevant urban design analysis show that liveability for the future residents is a primary consideration. Additional considerations that contribute to liveability, such as views, are implicit in the proposal.
3. Productivity. The proposal capitalises on its proximity to Parramatta CBD and will provide a part in contributing to sustainable future growth.
4. Sustainability. The Planning Proposal facilitates building capacity based on existing and committed infrastructure. This seeks to shape a strong and connected community.

Central City District Plan

The Central City District Plan sets out the priorities and actions for this District and these are structured around the same key themes as presented in the Greater Sydney Region Plan. As relevant to the subject site the importance of the growth within strategic centres in terms of both jobs and housing are continually emphasised in the District Plan. The Planning Proposal seeks to deliver additional housing within a 30-minute city scenario.

The Planning Proposal seeks to deliver housing and employment to the market quickly and in a highly liveable and accessible and central location.

In summary, this Planning Proposal seeks to deliver on the vision set forward in the Central City District Plan by:

1. Increasing diversity of housing choice.
2. Delivering housing to meet strategic housing supply targets.
3. Contribution to energy efficiency through aims to deliver a development that meets environmental performance criteria.
4. Reduced emissions through both building environmental performance but also through reduction in reliance on private vehicle travel. Focusing increased housing on the subject site which is highly accessible to local bus and train services means that future residents are more likely to walk, cycle and use integrated public transport systems.
5. Enhancing the role of Parramatta as the economic anchor with the vision to deliver both jobs and housing.

The objectives of the Planning Proposal are incontestably aligned with the documented priorities for the Central City District.

4 IS THE PLANNING PROPOSAL CONSISTENT WITH A COUNCIL LSPS THAT HAS BEEN ENDORSED BY THE PLANNING SECRETARY OR GSC, OR ANOTHER ENDORSED LOCAL STRATEGY OR STRATEGIC PLAN?

Parramatta Local Strategic Planning Statement

The Parramatta Local Strategic Planning Statement came into effect on 31 March 2020 and this document sets out the 20-year vision for land use planning for the City of Parramatta. The LSPS contains 16 planning priorities under 4 key themes which are:

- Local planning priorities.
- Liveability planning priorities.
- Productivity planning priorities.
- Sustainability planning priorities

The planning principles relevant to the proposal are addressed below.

7. Provide for a diversity of housing types and sizes to meet community needs into the future

Council policy direction 24 which fall within this priority is relevant to the proposal and is addressed below.

P24 Provide for a range of housing types and sizes that cater to the Parramatta community to ensure housing diversity consistent with the City of Parramatta Local Housing Strategy (once endorsed by Council and DPIE).

As per the findings of the Parramatta Local Housing Strategy (addressed in detail below), by 2036, the population of the City of Parramatta LGA is anticipated by over 175,000 people to a total of over 416,000 people and is expected to need an additional 77,000 dwellings to accommodate this population growth. The LHS notes that the investigation outcomes of this Strategy indicate that the population is likely to increase even more substantially.

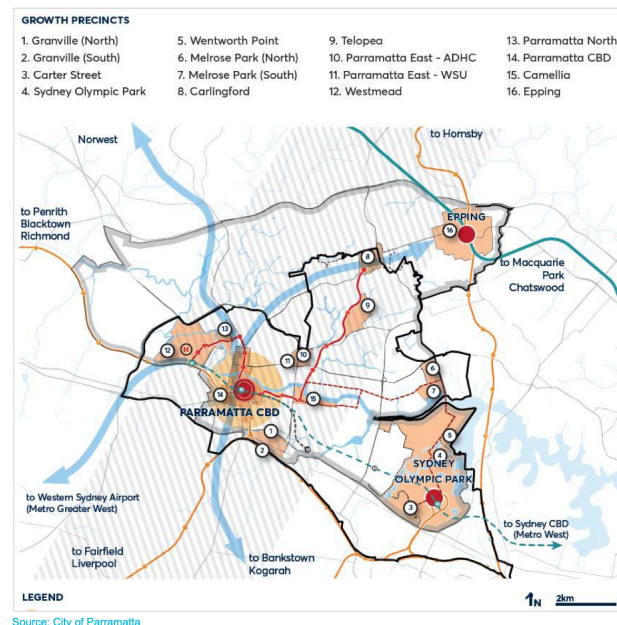
The proposal will allow for the construction of new residential units, which will fulfill the housing needs of the locality as identified by the LHS.

Parramatta Local Housing Strategy

The Local Housing Strategy (LHS) seeks to provide direction at the local level about when and where future housing growth will occur.

As illustrated in the extract from the Strategy below the subject site is located with the Parramatta CBD catchment which is identified in the strategy to contribute towards a forecast of 7180 dwellings by 2036.

Figure – City of Parramatta's Growth Precincts



The key findings of the LHS relating to this proposal are reflected below.

Parramatta is one of the fastest-growing LGAs in Greater Sydney

The City's growth rate is a product of sustained strategic planning over many years, and in recent years the LGA has seen some of the most dwelling completions of any LGA in Greater Sydney.

It already has a larger population than the City of Sydney and is expected to grow more than the City of Sydney over the next 20 years, reflecting the growing role of Parramatta as Sydney's second CBD. As the City—particularly the CBD and Westmead Innovation District—continues to strengthen economically, people will be attracted to living close to these important employment agglomerations.

The City of Parramatta is an LGA undergoing unprecedented change and transition. The population of the City is anticipated to grow by between 74% - 77% over the next 20 years (depending upon use of ABS or DPIE forecasts), making it more populous than the City of Sydney.

Not only will the City of Parramatta grow more than the City of Sydney; the population is anticipated to grow the most in absolute numbers by 2036 of any LGA in Greater Sydney - by over 175,000 people to a total of over 416,000 people (DPIE forecast figures, 2016).²⁷ That would make Parramatta the third most populous LGA behind Blacktown and Canterbury-Bankstown.

On the basis of DPIE 2016 demographic projections alone, the City is anticipated to need an additional 77,000 dwellings to accommodate this population growth, which represents an increase of around 3,850 dwellings a year. However, it should be noted, the investigation outcomes of this Strategy indicate that the population is likely to increase even more substantially.

Every age group is set to grow in Parramatta

Unlike the City of Sydney, where the younger working age population is the dominant demographic (which is in a relatively mature state in terms of economic versus residential function) (see Figure 8), Parramatta's population spans every service age group, and every age group is growing (see Figure 9). The City's anticipated growth to 2036 will include an additional:

- 69,200 additional workers with a 233,200 total workforce – 30% growth
- 12,951 young workforce (25-34) - 21% growth
- 39,546 parents and homebuilders (35-49) and corresponding growth in dependents - 44% growth
- 8,599 tertiary / early career (20-24) - 34% growth

- 34,317 seniors (70-84) and elderly (85+) - 64% growth.

Future housing supply will need to:

- ***Accommodate older and less able residents such as seniors and elderly residents.***

The key findings of the LHS show that, by 2036, the population of the City of Parramatta LGA is anticipated by over 175,000 people to a total of over 416,000 people and is expected to need an additional 77,000 dwellings to accommodate this population growth. The LHS notes that the investigation outcomes of this Strategy indicate that the population is likely to increase even more substantially. As a result, the LHS identified that future housing supply needs to be addressed. Importantly, the strategy includes the development site within the area that would contribute to the supply of forecasted housing.

5 IS THE PLANNING PROPOSAL CONSISTENT WITH ANY OTHER APPLICABLE STATE AND REGIONAL STUDIES OR STRATEGIES?

YES

This question is comprehensively addressed in the response to Question #1 above and reference to that question should be made, rather than repeat the discussion here.

It is self evident from an analysis of planning strategies and studies for Parramatta over the past 10 years that this Planning Proposal is entirely consistent with the vision and emerging planning controls that are instrumental in the elevation of Parramatta CBD within the Sydney metropolitan area.

SITE SPECIFIC MERIT

The simpler test for this planning proposal is the “strategic merit test”. The sites location in Parramatta CBD, the sites long held identification for redevelopment, the proximity to the CBD core, the excellent provision of public transport (notably the Light Rail), the sites proximity to the Westmead Health and Education Precinct, the established built form both north and south of the site of residential towers completed and proposed (all north of Parramatta River) and many other factors all confirm that the site is in no way without strategic merit.

The more demanding and relevant questions for the subject site is what is the right built form? What is the site specific merit? How does this site respond to the built form approved and existing west of the site along the Church Street corridor, and also respond to the heritage conversation area character east of the site.

This site specific planning proposal carefully considers this and includes a response that is of site specific merit. And helpfully provides an exemplar or model for other land in a similar mid block circumstance.

In resolving the proposed FSR and Height for the subject site the planning proposal has given consideration to –

- Relevant heritage principles;
- Appropriate height and FSR transition controls;
- Incorporation of a heritage site into the proposal to embed its ongoing protection as part of the planning proposal and be directly responsible for implementing heritage benefits; and
- The appropriate footprint and also the design of the tower form within the site to ensure that it is appropriate for the site, relates to adjoining sites, and becomes an prototype for other land parcels with similar features.

Heritage Principles Guiding Built Form Outcomes

Paul Davies heritage architects has guided the SSPP with respect to the way in which the subject site can respond to the circumstances of the site, with particular regard to the Sorrell St Heritage Conservation Area and the heritage items proximate to the site.

Following an analysis of the HCA and Heritage Items, relevant to the site, the report gives consideration to what form and scale of buildings can be designed on the subject land. Three principal approaches are summarised as =

- Maintain low scale development
- Use transitional or stepped forms of development
- Introduce larger scale and form

The key principles and guiding advice includes –

Setbacks and Creation of setting and public space

Ensuring that good setbacks to heritage elements or precincts is achieved is a key design element. In this case, with the heritage item forming part of the site there is the ability to use the rear former garden area of the heritage item in combination with a side setback on the site of the development to create a significant landscaped garden space that can include elements such as the major tree and parts of the early brick wall to create scale and form fronting the new building and the rear of the heritage item and address Harold Street. The

setbacks in the earlier Cox proposal are well resolved and achieve a good heritage and urban outcome.

This provides a substantial public benefit and the opportunity to design a subtle and landscaped based interface between new and old.

Form of the building

Designing a larger built element in the proximity of heritage buildings requires a different design approach to the often-cited model of podium and tower. While the podium form can work in some situations to reduce apparent scale, particularly if a building is built to a street edge, a more sophisticated and refined form is to design new buildings so that the form is grounded and simplified in massing. This is more characteristic of how heritage buildings are designed and grounded, including large buildings.

Excellent examples of this are early warehouse buildings, often of 8-10 storeys that use well- balanced façade and envelope design and shifting scale over the height of the building to create good urban form. While some of these buildings add detail, new design can provide similar techniques to manage form and apparent scale.

Height

There are several approaches to managing height in relation to changing contexts of height such as this site. If a built form is to exceed the heights of adjoining (in this case heritage) buildings, the height can either be nominally different or significantly different. There is a height at which the character of the site changes from low scale to high scale and the actual number of floors plays relatively little part in achieving good design or impacts the visual setting.

By way of example a development of say four storeys could be argued as consistent with the scale of the apartment buildings in the vicinity that characterise the area. They are not desirable forms but they set a current height framework. A building of say six or seven storeys changes the height framework even though not much higher than the apartment buildings. It could be considered a transitional height but the height change is significant. A height above six storeys, assuming that all of these scenarios are well-designed, does not necessarily significantly change the visual impact or setting. Once a built form moves beyond the scale of three or four storeys it assumes a different relationship in the urban form of the area and while there is a difference between say 10 or 15 storeys, the impact on the immediate areas around it are not affected by the actual height but by the quality of the building, its setbacks, design, etc.

A built form in the vicinity of eighteen storeys that is appropriately designed and sited will not have an adverse impact on the heritage item or HCA provided it is designed to form a backdrop building.

Building orientation

While the subject site is not a corner site, a new building will need to address both Harold Street and the HCA with principal facades. A larger than usual setback from the east boundary will assist with this as will the combination of the three lots in Harold Street with the site of the heritage item. Ideally a built form would be an 'in-the-round' design with all facades as designed facades avoiding the commonly used blank side walls that may or may not be built against in the future.

Materiality and façade design

The materiality and façade form then becomes a critical element to allow the built form to be seen as a building in its own right but also a backdrop building. Good design can involve façade articulation and break up, use of solid and void, limits on glazing and generally not using curtain wall systems, avoiding highly reflective materials and facades, designing the building in the round without bare blank walls, creating an activated ground plane, perhaps of greater scale but which interacts with human scale, landscape and civic form.

There are no set materials but the use of curtain walls, extensive pre-cast panels, highly modular forms and blank and plain materials would not be appropriate for the site

The above guiding principles have led to the proposed built form and the consequential planning controls sought in the Planning Proposal.

The Planning Proposal seeks to:

- Amend the Height of Building Map for Parramatta LEP 2011 to permit development with a maximum building height of 60m.
- Amend the Floor Space Ratio Map for Parramatta LEP 2011 to permit a maximum FSR of 5:1.

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

The proposed density uplift will only apply to 23-27 Harold Street, however, as recommended by the heritage advice, the proposal includes 53 Sorrell Street for heritage and urban design reasons, although the planning controls are to remain unchanged for that parcel of land.

A clear rationale has been developed for the appropriate built form and density for the site, that responds to the circumstances of adjoining land. The proposal demonstrates Site Specific Merit.

6 IS THE PLANNING PROPOSAL CONSISTENT WITH APPLICABLE SEPPS?

The following table provides a brief assessment of consistency against each State Environmental Planning Policy (SEPP) relevant to the planning proposal.

Consideration of relevant SEPPs	Comment
SEPP (Resilience and Hazards) 2021	<p>The existing uses of the site include residential development which are unlikely to result in contamination of the land.</p> <p>The planning proposal is consistent with the aims and provisions of this SEPP.</p> <p>In any case, future redevelopment of the site will need to address the requirements of the SEPP. The proposal is consistent with the provision of this SEPP.</p>
SEPP No. 65 - Design Quality of Residential Apartment Development	The planning proposal seeks to facilitate high-density housing in the form of a residential flat building. An urban design study submitted with this planning proposal considers potential design options which address the provisions of SEPP 65.
SEPP (Building Sustainability Index: BASIX) 2004	The planning proposal is consistent with the aims or provisions of this SEPP. Future development incorporating a BASIX affected buildings will be subject to the provisions of this SEPP.
SEPP (Transport and Infrastructure) 2021	Future development may constitute traffic generating development and trigger an assessment under this SEPP.
SEPP (Planning Systems) 2021	It is likely that future development of the site will constitute Regional Development and be determined by the Sydney West Planning Panel.

Q6. Is the planning proposal consistent with applicable Ministerial Directions (s.117 directions)?

The following table provides a brief assessment of consistency against each s.9.1 directions that are relevant to the Planning Proposal.

7 IS THE PLANNING PROPOSAL CONSISTENT WITH APPLICABLE MINISTERIAL DIRECTIONS (SECTION 9.1 DIRECTIONS)?

Ministerial Directions	Comments
Focus Area 1: Planning Systems	
1.1 Implementation of Regional Plans	This proposal is consistent with the objectives and strategies of A Metropolis of Three Cities as outlined in the Planning Proposal report. Refer to Part 3 – Justification of this report, Section B –

	<p>Relationship to Strategic Planning Framework of the Planning Proposal for an explanation of the consistency of the Planning Proposal.</p> <p>The planning proposal achieves the overall intent of the Plan and seeks to implement the achievement of its vision, land use strategy, policies, outcomes or actions.</p> <p>This planning proposal seeks to facilitate development of key parcels of land adjacent to the Parramatta CBD to provide additional residential accommodation within the central city.</p>
1.2 Development of Aboriginal Land Council Land	Aboriginal and archaeological investigations will be completed as part of the future detailed design and development application documentation.
1.3 Approval and Referral Requirements	The Planning Proposal does not introduce any provisions that require any additional concurrence, consultation or referral.
1.4 Site Specific Provisions	The planning proposal relates to building height and floor space ratio provisions. This planning proposal does not impose any development standards or requirements in addition to those already contained in the principal environmental planning instrument being amended.
Focus Area 1: Planning Systems – Place Based	Not relevant to the subject planning proposal.
Focus Area 2: Design and Place	Directions not made.
Focus Area 3: Biodiversity and Conservation	Not relevant to the subject planning proposal.
Focus Area 4: Resilience and Hazards	
4.1 Flooding	<p>The site is not within the 1 in 100 year Average Recurrence Interval, however it is within the Probable Maximum Flood (PMF) area. The proposal can be developed with a minimum floor level to comply with flood planning requirements. Any potential impacts because of development on the site, such as stormwater runoff, will be considered and addressed appropriately at relevant DA stages. This will also include any design detail required to ensure compliance with Council's water management controls within the Parramatta DCP.</p>
4.2 Coastal Management	Not relevant to the subject planning proposal.
4.3 Planning for Bushfire Protection	Not relevant to the subject planning proposal.

4.4 Remediation of Contaminated Land	<p>The existing uses of the site include residential development which are unlikely to result in contamination of the land.</p> <p>The planning proposal is consistent with the aims and provisions of this SEPP.</p> <p>In any case, future redevelopment of the site will need to address the requirements of the SEPP. The proposal is consistent with the provision of this SEPP.</p>
4.5 Acid Sulfate Soils	<p>The site is identified as Class 5 on the Acid Sulfate Soils Map in Parramatta Local Environmental Plan 2011. This will be addressed further at the development application stages.</p>
Focus Area 5: Transport and Infrastructure	
5.1 Integrating Land Use and Transport	<p>The Planning Proposal is consistent with this direction, in that it:</p> <ul style="list-style-type: none"> - will provide new dwellings near existing public transport links - will enable residents to walk or cycle to work if employed in the Parramatta City Centre or utilise train and ferry services. - makes more efficient use of space and infrastructure by increasing densities on an underutilised site.
5.2 Reserving Land for Public Purposes	Not relevant to the subject planning proposal.
5.3 Development Near Regulated Airports and Defence Airfields	Not relevant to the subject planning proposal.
5.4 Shooting Ranges	Not relevant to the subject planning proposal.
Focus Area 6: Housing	
6.1 Residential Zones	<p>The Planning Proposal is consistent with this direction, in that it:</p> <ul style="list-style-type: none"> - facilitates additional housing within the Parramatta CBD - provides residential development in an existing urban area that will be fully serviced by existing infrastructure - does not reduce the permissible residential density of land.
6.2 Caravan Parks and Manufactured Home Estates	Not relevant to the subject planning proposal.
Focus Area 7: Industry and Employment	
7.1 Business and Industrial Zones	Not relevant to the subject planning proposal.
7.2 Reduction in non-hosted short-term rental accommodation period	Not relevant to the subject planning proposal.
7.3 Commercial and Retail Development along the Pacific Highway, North Coast	Not relevant to the subject planning proposal.
Focus Area 8: Resources and Energy	Not relevant to the subject planning proposal.

SECTION C – ENVIRONMENTAL, SOCIAL AND ECONOMIC IMPACT

8 IS THERE ANY LIKELIHOOD THAT CRITICAL HABITAT OR THREATENED SPECIES, POPULATIONS OR ECOLOGICAL COMMUNITIES, OR THEIR HABITATS, WILL BE ADVERSELY AFFECTED AS A RESULT OF THE PROPOSAL?

The subject site does not contain habitat of any description. There is no likelihood that critical habitat or threatened species, populations or ecological communities, or their habitats, will be adversely affected as a result of the planning proposal. No further assessment is considered necessary at this stage of the planning proposal.

9 ARE THERE ANY OTHER LIKELY ENVIRONMENTAL EFFECTS AS A RESULT OF THE PLANNING PROPOSAL AND HOW ARE THEY PROPOSED TO BE MANAGED?

The Planning Proposal seeks to revise the maximum permitted building height and floor space ratio controls contained within Parramatta LEP 2011 in order to facilitate the redevelopment of the subject site for the purpose of high-density residential development. The anticipated environmental effects associated with the higher-density development that will be permitted by the amendment are discussed below.

10 HAS THE PLANNING PROPOSAL ADEQUATELY ADDRESSED ANY SOCIAL AND ECONOMIC EFFECTS?

The social and economic effects of the Planning Proposal are most appropriately described in the context of the challenges associated with a growing population as described in the State Government document the Metropolis of Three Cities. Among other things, the Plan explains that to meet the needs of a larger population and to maintain economic growth, urban renewal in combination with infrastructure delivery must occur in strategic urban centres.

As previously described, the objective of the Planning Proposal aligns closely with the strategic direction identified in the Metropolis of Three Cities. The delivery of high-density housing in a location that is well serviced by infrastructure and where there are minimal existing environmental site constraints is considered to represent a positive social outcome.

The Planning Proposal will facilitate future development that will result in higher population densities in Parramatta. In this regard, the Planning Proposal will support the emergence of Parramatta as Sydney's Central City which will in turn contribute to continued economic growth.

SECTION D – INFRASTRUCTURE (LOCAL, STATE AND COMMONWEALTH)

11 IS THERE ADEQUATE PUBLIC INFRASTRUCTURE FOR THE PLANNING PROPOSAL?

The site is suitable for high density residential development due to its superior access to transport and employment opportunities in the Parramatta CBD.

Given the proximity of the subject site to public transport services including the Parramatta light rail and bus services it is anticipated that a significant proportion of new residents would opt to use public transport rather than private vehicle.

The subject site is located adjacent to the Parramatta CBD which has a variety of health, education and emergency services. In a broader context, the subject site is within proximity to Westmead Hospital and the Western Sydney University which are regional institutions.

The Council has endorsed an infrastructure strategy as part of the Parramatta CBD Planning Proposal which is actualised through the floor space ratio controls proposed within the Parramatta CBD Planning Proposal. The provisions require delivery of community infrastructure to the satisfaction of the consent authority, whether provided on the subject site or an alternative site nominated by the consent authority.

12 WHAT ARE THE VIEWS OF THE STATE AND COMMONWEALTH PUBLIC AUTHORITIES CONSULTED IN ACCORDANCE WITH THE GATEWAY DETERMINATION?

The Planning Proposal has not yet received Gateway determination and consultation with the public authorities has not yet commenced.

PART 4 – MAPPING

It is understood that mapping will be prepared by the City of Parramatta Council to accord with the standard instrument mapping layouts prior to the Planning Proposal being reported to the Council for consideration. The planning proposal seeks amendments to Height of Buildings Map and Floor Space Ratio and Map.

PART 5 – COMMUNITY CONSULTATION

Community consultation will be undertaken in accordance with the requirements prescribed by the Gateway determination.

PART 6 – PROJECT TIMELINE

A project timeline is yet to be determined however will be formulated following discussions with the City of Parramatta Council and confirmation of any additional information required to allow consideration of the Planning Proposal.

An indicative timeline for the planning proposal includes:

Milestone	Timeframe
Consideration by council	September - November 2022
Council decision	December 2022
Gateway determination	February 2023
Pre-exhibition	February – March 2023
Commencement and completion of public exhibition period	March 2023
Consideration of submissions	April 2023
Post-exhibition review and additional studies	May - June 2023
Submission to the Department for finalisation (where applicable)	June 2023
Gazettal of LEP amendment	August 2023

CONCLUSION

This Planning Proposal explains the intended effect of and provides a justification for a proposed amendment to the *Parramatta Local Environmental Plan 2011* (Parramatta LEP 2011). The Planning Proposal has been prepared in accordance with Section 3.33 of the *Environmental Planning and Assessment Act 1979* and the Department of Planning and Environment's document *Local Environmental Plan Making Guideline* December 2021.

The Planning Proposal describes how the intended outcome of the proposed LEP amendments align closely with the strategic directions established in State Government documents including *A Metropolis of Three Cities – Greater Sydney Region Plan*, the *Central City District Plan*, the *Greater Parramatta and Olympic Peninsular Plan*, the *CBD Planning Proposal*, and the *Parramatta CBD Strategy*.

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. The planning proposal is considered to have strong merit based on a sound analysis of relevant planning considerations and is submitted to Parramatta City Council for consideration.