

WILLOWTREE PLANNING



18 February 2024

REF: WTJ22-513

Amberley Moore
City of Parramatta
PO Box 32
Parramatta NSW 2124

Attention: Amberley Moore, Major Projects and Precincts

RE: PLANNING PROPOSAL TO AMEND THE PARRAMATTA LOCAL ENVIRONMENTAL PLAN 2023 FOR ADDITIONAL BUILDING HEIGHT AND ADDITIONAL FLOOR SPACE RATIO TO FACILITATE HIGH-DENSITY RESIDENTIAL ACCOMMODATION 93 BRIDGE ROAD, WESTMEAD (SP 31901)

Dear Amberley,

This letter has been prepared by Willowtree Planning Pty Ltd on behalf of 93 Bridge Road Pty Ltd atf Bridge Road Unit Trust, and forms an appendix to the Planning Proposal for the amendment of the *Parramatta Local Environmental Plan 2023* (PLEP 2023) to include additional building height, additional floor space ratio (FSR) on the Site. The land subject to the Planning Proposal is described as 93 Bridge Road, Westmead (SP 31901).

The proposed rezoning intends to facilitate the future development of the Site for high-density residential accommodation. The Planning Proposal seeks to optimise the Site's contribution to the Westmead Health and Education Precinct and Innovation District through a 4.25:1 FSR and 69m building height (20 storeys).

To demonstrate that the Proposal satisfies the strategic merit test and enjoys site-specific merit, an assessment has been carried out in accordance with 'Part 3 – Justification of strategic and site-specific merit' of the Department of Planning, Housing and Infrastructure's (DPHI) *Local Plan Making Guideline* (August 2023). It is noted that whilst not required for the purpose of submitting the Planning Proposal to Council, the merit test is considered relevant for the purpose of providing additional strategic justification for the Proposal.

ACN: 146 035 707 ABN: 54 146 035 707
Suite 204, Level 2, 165 Walker Street
North Sydney NSW 2060

enquiries@willowtp.com.au
willowtreeplanning.com.au
02 9929 6974



SYDNEY | NEWCASTLE | GOLD COAST | BRISBANE

TABLE 1. STRATEGIC MERIT TEST

Strategic Merit Criteria	Merit Assessment
<i>Does the Proposal:</i>	
<p>Give effect to the relevant regional plan outside of the Greater Sydney Region, the relevant district plan within the Greater Sydney Region, and/or corridor/precinct plans applying to the site. This includes any draft regional, district or corridor/precinct plans released for public comment or a place strategy for a strategic precinct including any draft place strategy; or</p>	<p>The proposed rezoning is consistent with the Greater Sydney Region Plan; the Central City District Plan; the Westmead Place Strategy; the Greater Parramatta to Olympic Peninsula (GPOP); and the underlying principles of the Westmead Health and Education Precinct and the 30-minute city.</p> <p>The envisaged development of the Site would ensure the most efficient and effective use of land zoned for High-Density Residential accommodation, and would see much-needed new housing concentrated in an existing urban area underpinned by significant employment opportunities and public transport accessibility, together with the major infrastructure investment committed for Westmead.</p> <p>The Proposal would enable a source of additional housing supply at a highly accessible location within the GPOP Urban Renewal Corridor and the Westmead Health and Education Precinct and Innovation District.</p> <p>Through the delivery of 486 much-needed new homes, the Proposal would contribute to meeting escalating local and regional housing target shortfalls, placing downward pressure on prices to improve affordability; particularly for those key workers, skilled workers, and professionals based in the Westmead Health and Education Precinct and Innovation District. The Proposal would also contribute to diversifying housing choice. A range of dwelling sizes as well as the inclusion of Affordable Rental Housing would assist in accommodating a variety of price-points, meeting the needs of Sydney's diverse and growing population, and ensuring the creation of sustainable and balanced communities.</p> <p>With specific respect to the <i>Westmead 2036 Place Strategy</i> (Place Strategy), this establishes the vision for Westmead as "<i>Australia's premier health and innovation district – an ecosystem for new discoveries, economic growth and global recognition Westmead will also deliver exceptional place outcomes for the Central River City, with enhanced heritage and environmental assets, activated places, connected communities and housing choice</i>".</p> <p>Aligning with the vision of the Place Strategy, the Proposal would deliver diverse new housing to</p>



	<p>augment choice and supply, activate the Site and public domain through a variety of active uses and public spaces, and connect the local community to living, working, studying, and socialising opportunities through co-location within the Site and close walking and cycling proximity to the balance of the Precinct and its major public transport termini.</p> <p>The Place Strategy includes a Structure Plan for Westmead, which identifies the Site as 'existing residential'. Of note, the adjoining site to the north is identified as 'mixed use (health focus)'. Whilst the Structure Plan reflects the existing situation of the Site, it does not provide express guidance on future development.</p> <p>Supporting new housing opportunities is an important objective of the Westmead Place Strategy, and this identifies 'opportunity areas' where new housing supply could be targeted. Housing opportunity areas on the northern side of the railway line (i.e. within the Parramatta LGA) are focused in the 'Westmead East', 'Parramatta North', and 'Northmead Residential' sub-precincts.</p> <p>Atlas Economics advise the likelihood of new housing supply in these various parts of Westmead are "mixed". The nature of existing land uses, lot patterns, and land ownership will collectively influence underlying land and property values in each of these areas and accordingly the viability (and deliverability) of future development. A high-level assessment of the prospects of future housing development in each of these areas is considered within Atlas's Urban Economic Assessment enclosed at Appendix 9.</p> <p>Liveability Direction 8 otherwise promotes the housing renewal of old building stock and the revitalisation of existing residential areas. The Place Strategy stipulates that further studies are to focus on housing intensification and diversification within 800m of Westmead Station, and in proximity to open space amenity, to provide key worker, social and affordable housing. The scale of future housing development is to be informed by urban design studies, ensuring it respects solar access, views, and vistas to open spaces.</p> <p>Reflecting the 'residential' designation of the Structure Plan and aligning with Direction 8, the Proposal would provide a diverse offering of residential accommodation including affordable</p>
--	---



	<p>housing. The proposed density of development is suitable for the Site considering the criteria under Direction 8, given its highly accessible and sustainable location (attributes which will be further enhanced by the imminent arrival of the Light Rail and Metro). The Site also benefits from being within an 800-metre catchment that includes 17.6 hectares of parks, 1 hectare of sporting space, and 4.9 hectares of natural areas; and would incorporate new open space to create a highly amenable environment for the new community.</p> <p>The Proposal has been informed by detailed urban design analysis (refer Appendix 5), which demonstrates that the Proposal would suitably respect solar access, views, vistas and general amenity.</p> <p>To further facilitate the renewal initiatives and actions, Westmead has been divided into sub-precincts. Each is defined by its own purpose and distinct character to create an integrated, coherent, and sustainable community. The Site is located within Sub-precinct 2 'Health and Innovation; Westmead's engine room'.</p> <p>In accordance with the outcomes for Sub-precinct 2, the Proposal would support core health and innovation through the provision of diverse additional housing supply within a high-density development that encourages vibrancy and vitality through active ground floor uses and a high-quality public domain. The proposed permeable network of shared streets, pedestrian lanes and open spaces would promote walkability, cyclability and connect the green grid in accordance with the objectives of the Place Strategy.</p> <p>Overall, the Proposal would support the vision, directions, and purpose of the Place Strategy, as it would provide new, high-density residential accommodation within 800m walking distance of Westmead Station and inclusive of new open spaces, an activated public domain and a permeable street network.</p> <p>As detailed in Part 3 of the Planning Proposal Report, the proposal is also consistent with a full range of applicable State, regional and local strategic plans, including the NSW State Priorities and Directions for a Greater Sydney..</p> <p>Overall, consistent with strategic policy for urban renewal corridors and health, education and innovation precincts generally, and GOP and Westmead specifically, the Proposal would create</p>
--	---



	<p>opportunities for diverse new housing and an activated public domain, combining to revitalise strategically located land in immediate proximity of major public transport and employment opportunities.</p>
<p>Demonstrate consistency with the relevant LSPS or strategy that has been endorsed by the Department or required as part of a regional or district plan; or</p>	<p>The proposed rezoning is consistent with Parramatta Council's <i>Local Strategic Planning Statement</i> (LSPS), which has been informed by Council's <i>Local Housing Strategy</i> (LHS), <i>Community Strategic Plan</i>, and <i>Community Infrastructure Strategy</i>.</p> <p>For the purpose of the LSPS and LHS, Westmead is identified as a Strategic Centre and one of sixteen (16) Growth Precincts.</p> <p>The majority of housing growth is to occur in the designated Growth Precincts, close to public transport and other services, and primarily (73%) within the GPOP Corridor. 4,470 new homes would be allocated to Westmead (resulting in 8,000 total homes in Westmead by 2036). The LHS clarifies that this represents capacity in Westmead for land that is yet to be rezoned or where <i>further</i> part rezoning is to occur i.e. planning proposals are required for this figurative capacity to be released.</p> <p>Accordingly, the Proposal would align with the rezoning that is required within the Westmead Growth Precinct in order to realise the capacity and deliver the dwellings forecasted by the LSPS and LHS.</p> <p>In addition, the LSPS states that the workforce is projected to grow from 164,000 in 2016 to 250,000 in 2036, with 60% of new jobs to be in centres including the Westmead Health and Education Precinct. In total, 28,700 additional jobs (resulting in 48,500 total jobs) are targeted for Westmead by 2036.</p> <p>In accordance with the LSPS and LHS Priorities and targets, the Proposal would focus new housing in the designated Westmead Growth Area and Strategic Centre, which in turn forms part of the GPOP corridor, and would reinforce its primary function and operation. A diversity of housing types and sizes would be incorporated to meet community needs into the future. Through the co-provision of precinct-supportive uses, open spaces and walking and cycling links, the Proposal would contribute to the community infrastructure and recreation opportunities promoted by the LSPS and LHS. Accordingly, the proposal would sequence the new development with infrastructure, to support connectivity and</p>



	<p>access to services, jobs, transport, community facilities and open space.</p> <p>Additionally, Westmead forms one of the high growth areas identified by the Community Infrastructure Strategy. The Proposal would deliver an extensive range of social infrastructure, including many of the types of social infrastructure expressly identified as being needed for Westmead. These include affordable housing, new streets, pedestrian through-site links, cycle lanes and footpaths, and publicly accessible open space.</p> <p>In conjunction with the above-listed extensive offering of social infrastructure, a draft VPA Offer would be prepared in discussion with Council.</p>
Respond to a change in circumstances that has not been recognised by the existing planning framework.	<p>The proposed inclusion of 486 much-needed new homes in the Proposal responds to the underlying development trends and changes occurring in the wider region across Sydney more generally. This additional housing supply represents a small fraction of the dwelling targets identified for the Central City region and for Greater Parramatta as well as Westmead itself. This is additional supply that would easily be absorbed by ongoing demand, especially as employment opportunities within Westmead increase in the near future.</p> <p>Based on DPHI's latest population projections, Parramatta's population will grow by approximately 127,000 residents by 2041. This rate of growth (2% per annum) is markedly faster than that expected across Greater Sydney (1.2% per annum). To support this level of population growth, there is an anticipated need for an additional 54,000 dwellings by 2041, which is equivalent to over 2,800 new dwellings per annum.</p> <p>DPHI's most recent housing supply forecasts indicate that for each year over the coming 5-years, the Parramatta LGA is unlikely to meet this implied dwelling target of 2,800 dwellings per annum. This will result in a cumulative undersupply of between -4,400 dwellings and -6,200 dwellings by 2028.</p> <p>In addition, Atlas Economics have interrogated the reliance of the Place Strategy upon the 'Westmead East', 'Parramatta North', and 'Northmead Residential' sub-precincts to unlock housing supply within Westmead. The nature of existing land uses, lot patterns, and land ownership will collectively influence underlying land and property values in each of these areas and accordingly the viability (and deliverability) of</p>



	<p>future development. A high-level assessment of the prospects of future housing development in each of these areas is considered within Atlas's Urban Economic Assessment enclosed at Appendix 9.</p> <p>A change in circumstances is also afforded by the fact the Site falls within the catchment for the new Parramatta Light Rail (opening in 2024) and Sydney Metro West (opening in 2032), with these stations to be located well within 800m walking distance of the Site. Additionally, the implementation of Parramatta Council's Green Grid and the objectives set down within the Place Strategy would increase permeability in the local area, further reducing distances to public transport nodes, whilst promoting an improved walking and cycling experience.</p> <p>Accordingly, in the future the Site will benefit from enhanced accessibility by public and active transport links. Given this significantly augmented accessibility, the Site is ideally located for the new, higher density residential accommodation required by the escalating shortfall of housing supply.</p>
Site Specific Merit Criteria	Merit Assessment
<i>Does the Proposal give regard and assess impacts to:</i>	
The natural environment on the site to which the proposal relates and other affected land (including known significant environmental areas, resources, or hazards)	<p>The Site is not identified in proximity of any area of biodiversity and accordingly the Proposal would not exhibit any adverse impact on the natural environment or other resources. Rather the Proposal relates to a Site that has been historically developed, is highly disturbed, comprises limited existing vegetation, and forms part of an established urban area.</p> <p>The Site's redevelopment would create opportunities for development designed in accordance with the principles of Environmentally Sustainable Development (ESD), new public streets, pedestrian links and open spaces, and other uses that support the Westmead Health and Education Precinct and Innovation District, through the co-location of housing, jobs and services, and the promotion of active transport use.</p> <p>Landscaping across the Site would significantly enhance the amenity of the Site, contribute to the fine grain and human scale of the streetscape, boost the urban tree canopy, positively contribute to microclimate, biodiversity and habitat, connect to existing green corridors to support the expansion of green links through Westmead and</p>



	<p>Parramatta, and optimise opportunities for social interaction amongst residents, workers, visitors and the wider community.</p>
<p>Existing uses, approved uses, and likely future uses of land in the vicinity of the land to which the proposal relates</p>	<p>The concept design has been informed by a detailed site analysis and consideration of the surrounding context in order to provide an optimal development outcome that capitalises on the strategic potential of the land, uplifts the surrounding public domain, and provides a high level of amenity.</p> <p>The Site is the largest, amalgamated land holding identified for residential use in the Westmead Health and Education Precinct and Innovation District.</p> <p>The Site and surrounding area are zoned for a combination of high-rise residential development, education establishments with no height limit, and health facilities with no height limit. Currently, the area incorporates a range of building heights generally ranging from three (3) to sixteen (16) storeys and land uses that would be described as relatively intense. Land to the immediate north is considered to exhibit significant redevelopment potential, and given that it is unconstrained by any maximum building height or FSR controls, will likely be developed for higher densities and high-rise built form commensurate with the sustainability of the location.</p> <p>The building height, density and uses proposed for the Site therefore present the opportunity to create a transition between existing multi-storey residential flat buildings to the south and west, the anticipated future high rise development on land to the north; and the wider Health and Education Precinct and Innovation District, of which the Site is a constituent part.</p> <p>The stepped design of the concept development would align the tower elements along the northern boundary of the Site, adjacent to the future development site considered likely to accommodate high density built form; and along the Bridge Road frontage. Lower building elements and publicly accessible open space would occupy the central and southern portions of the Site, addressing the southern boundary where existing residential development comprises the four apartment buildings forming the Monarco Estate.</p> <p>The design response would therefore complete the circular configuration of the Monarco Estate sub-precinct, and would provide an effective</p>



	<p>transition in height and scale while protecting the amenity of the existing residential neighbours to the south, the amenity of the future occupiers of the Site, and while increasing and enhancing the provision of open space.</p> <p>In summary, the proposal would introduce a transitional development that complements the range of surrounding land uses, integrates with the variety of built form densities in the general area, responds to the strategic location of the Site, and leverages new infrastructure investment (namely the arrival of the Light Rail and Sydney Metro West).</p> <p>The proposed height, FSR and range of land uses also reflect strategic directions for urban renewal and transit corridors, education and health precincts, innovation districts, and development in the vicinity of new transit nodes.</p> <p>The Urban Design Report (Appendix 5) also includes analyses relating to solar amenity, visual impact, and compliance with the Apartment Design Guidelines.</p> <p>The Proposal is also accompanied by a full range of technical reports which confirm there are no material effects that would preclude Council's support.</p> <p>An Acoustic Impact Assessment has been prepared by Pulse White Noise Acoustics and is enclosed at Appendix 13. Noise effects relating to the intended operation of the Site, including the marginal increase in road traffic, have all been found to be policy compliant.</p> <p>A Preliminary Aviation Impact Assessment has similarly been prepared by Aviation Projects and is enclosed at Appendix 12.</p>
<p>Services and infrastructure that are or will be available to meet the demands arising from the proposal and any proposed financial arrangements for infrastructure provision.</p>	<p>The Site is serviced by existing infrastructure that is capable of servicing higher density residential, development. In particular the Site is highly accessible by public transport, being within 800m walking distance of Westmead train station and Wentworthville train station. Bus stops directly adjacent to the site frontage provide services to Parramatta Station, Merrylands Station and Blacktown Station. A number of T-ways are located along surrounding streets, including Hawkesbury Road, Darcy Road, Mons Road, Briens Road and Old Windsor Road. The area is also serviced by major road infrastructure. The Site subsequently scores a Public Transport Accessibility Level (PTAL) rating of 6, which is the</p>



	<p>highest grade available and denotes a 'very high' level of connectivity to public transport.</p> <p>Resulting from the proximity of the Site to public transport, active transport networks and services, the site has been awarded a walk score of 71 ('very walkable - most errands can be accomplished on foot') and a transit score of 64 ('good transit - many nearby public transportation options').</p> <p>Importantly, in the future the accessibility and walkability of the site will be further enhanced through the delivery of Parramatta Light Rail and Sydney Metro West, both within approximately 800m walking distance of the site. The implementation of City of Parramatta Council's Green Grid would increase permeability in the local area, decrease distances to public transport nodes, and promote an improved walking and cycling experience.</p> <p>Ason Group has been retained by the Proponent to prepare a Transport Assessment (Appendix 8) in relation to the Proposal. Ason forecast that the envisaged development would result in a traffic generation of 97 and 77 vehicles in the AM and PM peaks, respectively. Noting that there is an existing residential development generating 16 vehicles in each peak period, this results in a net increase of 81 vehicles in the AM peak and 61 vehicles in the PM peak. An assessment of intersection performance using SIDRA modelling leads Ason to conclude that the Proposal is supportable on traffic grounds as it will have minimal impact upon the performance of the key intersections identified within the Site's vicinity.</p> <p>With specific respect to infrastructure services, an overview of services and engineering considerations has been provided to assist in the stage one due diligence and planning application process for the envisaged development of the Site. A Civil Engineering and Infrastructure Assessment Report, prepared by Costin Roe, is duly enclosed at Appendix 11.</p> <p>Costin Roe advise that all major services are located in the vicinity of the Site, and that there is scope to either extend or upgrade these services to facilitate the envisaged development. The servicing for the Site would be completed at no cost to Government and would not impinge on the services of existing landowners.</p> <p>A Social Impact Assessment, prepared by Hill PDA and enclosed at Appendix 10, forecasts that the Proposal would generate an approximate population of 1,026 people. Hill PDA conclude</p>
--	---



	<p>that the subsequent additional demand for childcare and school places is likely to be catered for by the existing range of education and childcare facilities within proximity of the Site. Hill PDA further note that a new education campus has been proposed by the NSW Government in Westmead, involving the construction of a new pre-school, a 1,000 student primary school, and a 2,000 student secondary school. The Site also benefits from being located within the Westmead Health and Education Precinct and Innovation District, in proximity to a range of existing social infrastructure facilities. Overall, Hill PDA anticipate the Proposal to have a positive social outcome and consider that it should be supported.</p> <p>As described above, the Proposal would deliver an extensive range of social infrastructure, including many of the types of social infrastructure expressly identified as being needed for Westmead by Parramatta Council's Community Infrastructure Strategy. These include affordable housing, a new street, pedestrian through-site links, cycle lanes and footpaths, and publicly accessible open space. VPA discussions will explore the opportunity to facilitate additional infrastructure including desired open space embellishments in Shannons Paddock.</p>
--	---

The above assessment demonstrates that the proposed rezoning for additional building height and additional FSR to facilitate a high-density residential development on the Site exhibits strategic merit and site-specific merit.

The Proposal is consistent with key strategic plans for the Site, the Westmead Health and Education Precinct and Innovation District, the GPOP Corridor, the Central City District, and Greater Sydney.

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

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

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

Yours sincerely



Chris Wilson
Managing Director
Willowtree Planning Pty Ltd

