



PLANNING PROPOSAL

33-43 Marion Street, Parramatta

Planning Proposal drafts

Proponent versions:

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INTRODUCTION

This planning proposal explains the intended effect of, and justification for, the proposed amendment to *Parramatta Local Environmental Plan 2011* for land at 33-43 Marion Street, Parramatta (“the subject site”). It has been prepared in accordance with Section 3.33 of the Environmental Planning and Assessment (EP&A) Act 1979 and the Department of Planning and Environment (DPE) guides, *'A Guide to Preparing Local Environment Plans'* (August 2016) and *'A Guide to Preparing Planning Proposals'* (August 2016).

Purpose of this Report

This planning proposal has been prepared in support of an application to amend the maximum building height control from 12 metres to 80 metres, excluding incentives for design excellence; increase the maximum floor space ratio (FSR) control from 2:1 to 6:1, excluding incentives for design excellence; delist the heritage item at 37 Marion Street (I731) from Schedule 5 Environmental Heritage of the Parramatta Local Environmental Plan 2011; and include a satisfactory arrangements clause for the provision of state infrastructure. The subject site is zoned B4 Mixed Use and no change to the land use zone is proposed.

The planning proposal will facilitate a mixed use tower building, containing retail, commercial and social infrastructure land uses, and residential apartments above. The site is opposite the Harris Park railway station and within 600 metres walking distance of the Parramatta railway station.

In accordance with relevant NSW Department of Planning and Environment guidelines, including *'A Guide to Preparing Local Environmental Plans'* (2016) and *'A Guide to Preparing Planning Proposals'* (2016), this planning proposal comprises the following parts:

- Part 1 A statement of the objectives and intended outcomes of the proposed instrument
- Part 2 An explanation of the provisions that are to be included in the proposed instrument
- Part 3 The justification for those objectives, outcomes and the process for their implementation
- Part 4 Maps, where relevant, to identify the intent of the planning proposal and the area to which it applies
- Part 5 Details of the community consultation to be undertaken on the planning proposal
- Part 6 The timeframe to complete the amendment

This planning proposal forms part of a package of supporting documents for consideration by Council and the Gateway under Section 3.34 of the EP&A Act 1979. This Planning Proposal application is therefore supported by the following studies and documentation:

- Urban Design Report (UDR), prepared by Aleksandar Design Group dated November 2019 (updated as per Gateway conditions October 2018, May 2019 and July 2019);
- Statement of Heritage Impact, prepared by Cracknell & Lonergan Architects dated May 2017
- Heritage Fabric Analysis and Photographic Record, prepared by Cracknell & Lonergan Architects dated May 2017
- Traffic and Transport Assessment, prepared by Ason Group dated May 2017;
- Statement of Economic Impact, prepared by PPM Consulting dated May 2017;
- Landscape Plan, prepared by Jane Irwin Landscape Architecture dated May 2017;
- Heritage Assessments (x3), (for 29, 31, and 37 Marion Street) prepared by John Oultram Heritage & Design dated September 2017;
- Heritage Response to Gateway conditions report, prepared by Peter Lonergan, dated October 2018.

Site Identification

The site is located at 33-43 Marion Street, approximately 600 metres south of the Parramatta train station and 50 metres from the entrance to the Harris park train station.

The below figures illustrate the location of the site in its broader context and identifies the site.

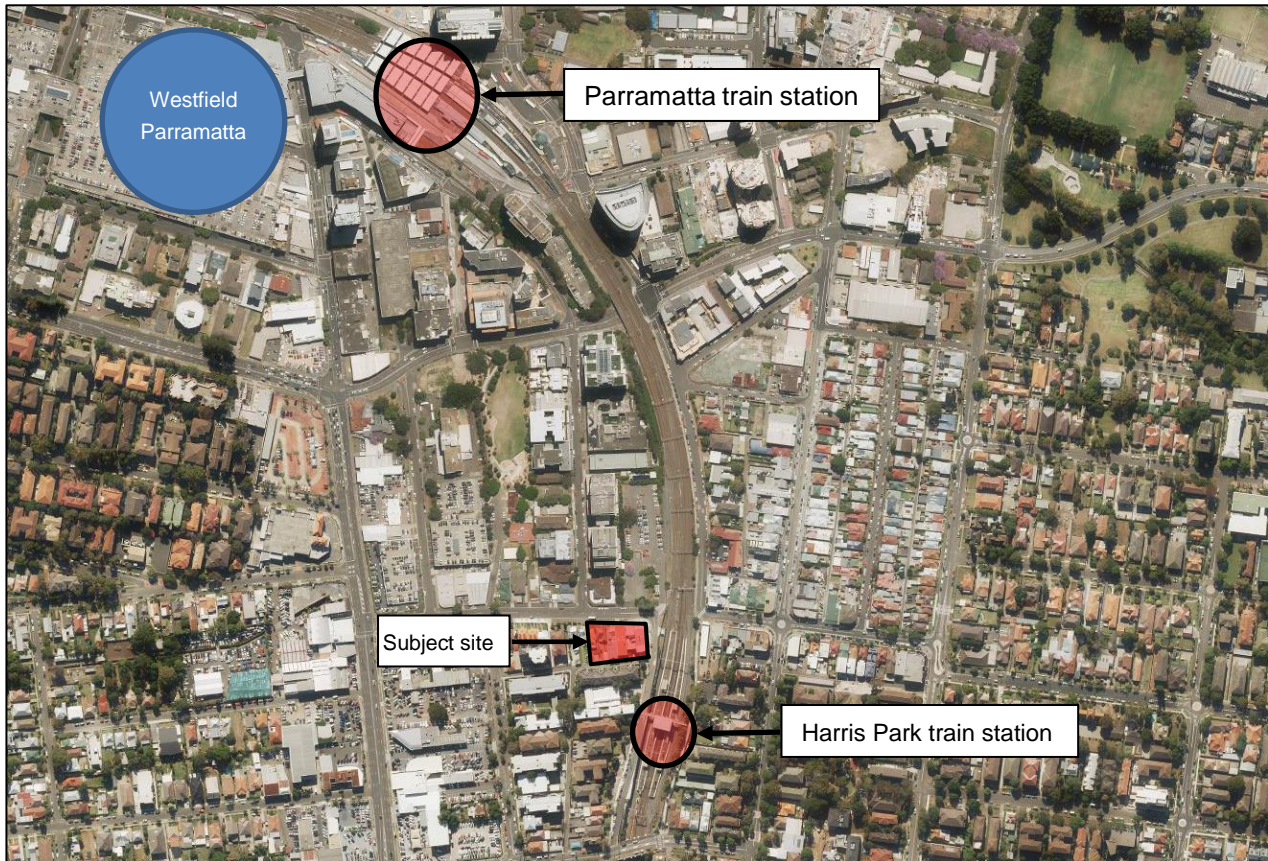


Figure 1: Site context

Figures 2 and 3 below identify the site. Figure 2 provides an aerial view of the subject site and Figure 3 identifies the site lot layout. The UDR provides a comprehensive review of the site in its context. The site comprises seven (7) allotments and is known legally as follows:

- 33 Marion Street (Lot 10 DP 976) - 411 m²
- 35 Marion Street (Lot 11 DP 976) – 398.4 m²
- 37 Marion Street (Lot 12 DP 976) - 392 m²
- 39 Marion Street (Lot 13 DP 976) – 379.4 m²
- 41 Marion Street (Lot 14 DP 182289) – 366.7 m²
- 43 Marion Street (Lot A DP 349279) – 246.6 m² and (Lot 1 DP 747666) – 173.4m²

Total area = 2367.5m²



Figure 2: Aerial view of the subject site

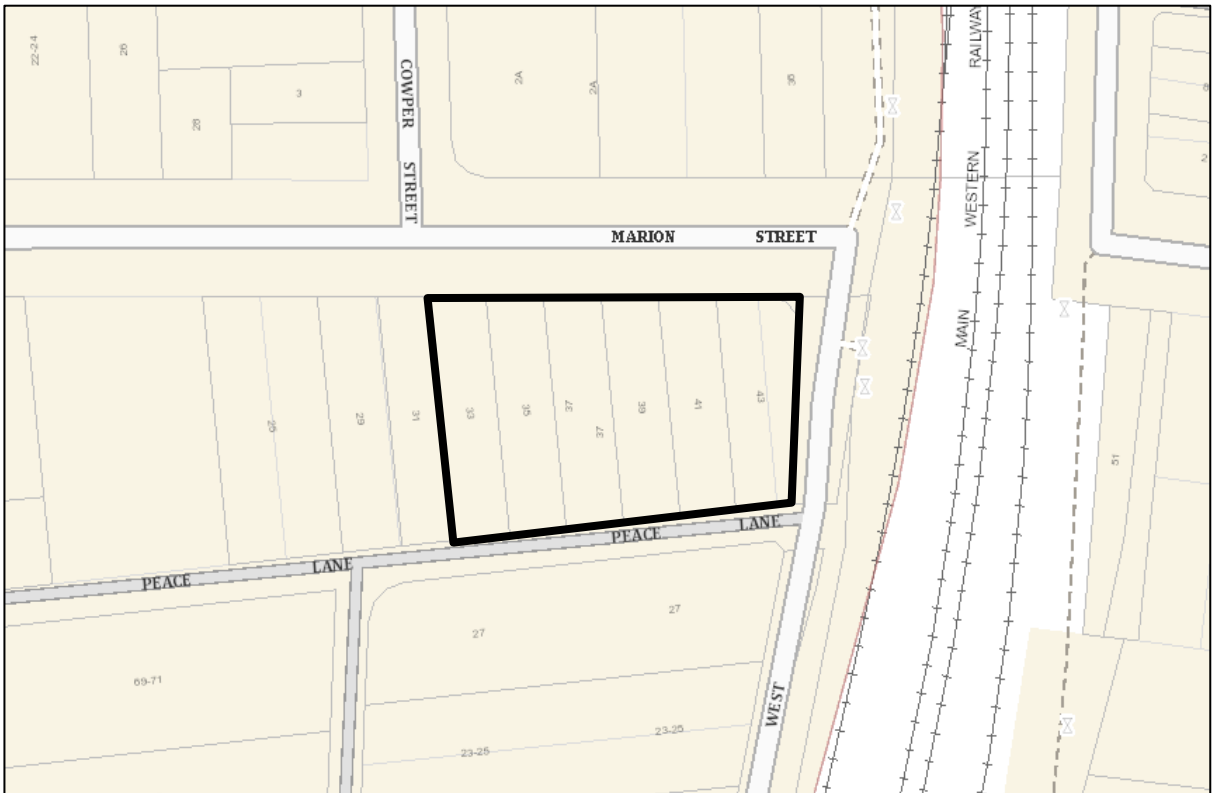


Figure 3: Site lot layout

Principal Development Standards

Table 1 below summarises the Parramatta LEP 2011 principal development standards that currently apply to the subject site:

Land Zoning	Maximum Building Height	Maximum Floor Space Ratio	Heritage
B4 Mixed Use	12 metres	2:1	Yes (37 Marion Street only)

Table 1: Principal development controls

The site is currently zoned B4 Mixed Use under the Parramatta Local Environmental Plan 2011. It is located on the west side opposite the Harris Park railway station and within 600 metres of the Parramatta railway station. The area is characterised by B4 zoned land, but contains a mix of newer high density buildings and older low density buildings with varying degrees of significance. The following figures show the current LEP provisions.

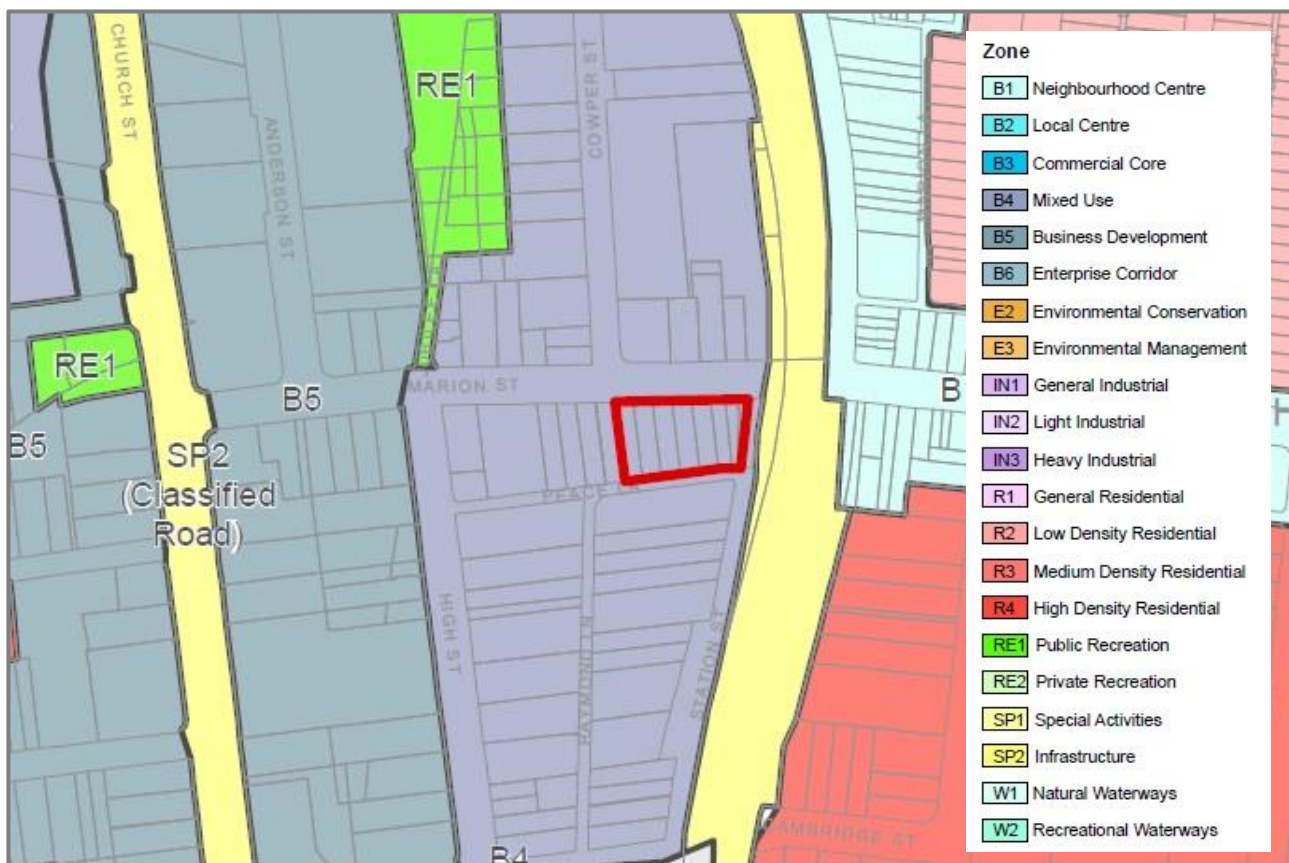


Figure 4: Parramatta LEP 2011 Zoning Map



Figure 5: Parramatta LEP 2011 Floor Space Ratio Map

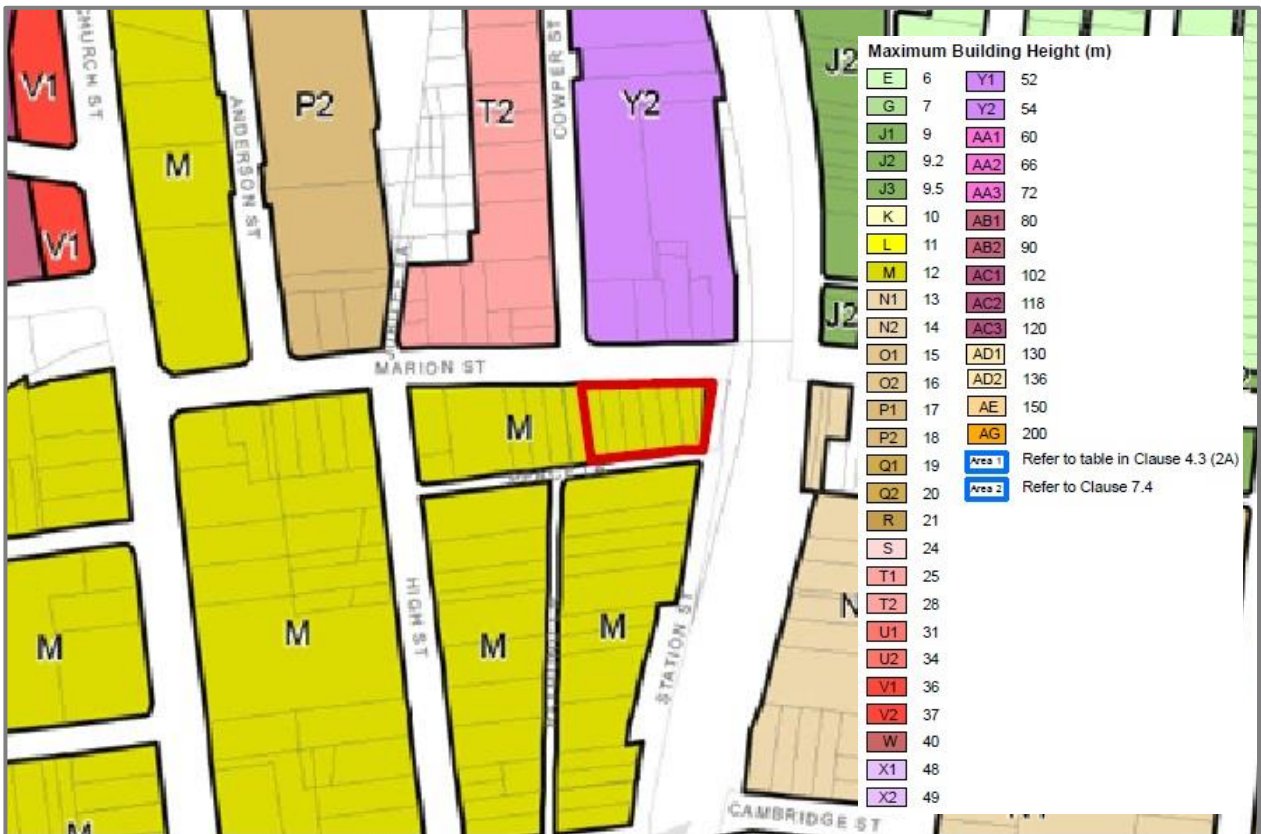


Figure 6: Parramatta LEP 2011 Height of Building Map



Figure 7: Parramatta LEP 2011 Heritage Map

Note: Demolition of Heritage item 1731 at 37 Marion Street (part of the subject site above) was approved (DA/823/2017) by the Parramatta Local Planning Panel on 10 April 2018.

Background

The Planning Proposal was originally lodged with Council on 11 May 2017. On 11 April 2016, Council adopted the draft Planning Proposal for the Parramatta CBD, which generally sought to increase the FSR of most sites within the Parramatta CBD and provide incentive provisions for design excellence and high performing buildings.

The original Planning Proposal lodged with Council sought the following amendments:

- Increase the maximum FSR from 2:1 to 10:1 (excluding incentives); and
- Increase the maximum building height from 12 metres to 102 metres.

Subsequently Council considered a report on 11 December 2017 related to the Planning Proposal and heritage items within Marion Street. At this meeting Council resolved as follows:

- That Council reaffirm its position from pre administration and that Marion Street precinct (east of High Street) should have a maximum incentive FSR of 6:1 FSR with no height control in line with draft City Centre Planning Proposal as adopted by the Parramatta City Council in April 2016. This is exclusive of incentives for design excellence and incentives for high performing buildings.*
- That the Department of Planning be advised that this is Council's current position for the CBD PP in terms of informing their Gateway Assessment.*
- That Council use the two independent heritage assessments provided by the applicant and not spend the \$20,000 to complete similar work.*
- That given the compromised heritage and inaccuracies in the mapping, that no heritage conservation zone be considered in the Marion Street precinct.*
- Further, that Council officers finalise the assessment of the site-specific planning proposal and send to the State Government for Gateway Assessment in line with the above, that is:*
 - maximum 6:1 FSR, excluding incentives for Design Excellence and high performing buildings*
 - no heritage conservation zone*
 - heritage items within and adjacent to the proposed development site (i.e. 37 Marion Street within the site and 29 and 31 Marion Street outside the site) are delisted in accordance with the two heritage reports provided by the applicant noting inaccuracies in listing, compromised heritage fabric and overall context of the sites location near the train station and within the area of the CBD planning framework.*

Subsequently, the Planning Proposal was forwarded to the Department of Planning and Environment for consideration by the Gateway.

A development application was lodged for the demolition of 37 Marion Street which is a listed heritage item (Item 731). This was supported by two independent heritage reports prepared by Peter Lonergan and John Oultram. They included an analysis of their significance against the NSW Heritage Manual assessment criteria, a fabric assessment and consideration of its contribution to the local character. The demolition application was unanimously approved on 10 April 2018. In making its determination the Panel:

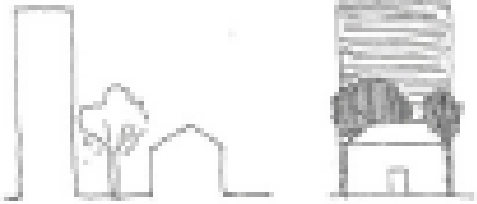
“agreed with the heritage reports submitted by the applicant, and its inspection of the heritage items confirmed that it is not worthy of retention, having lost most of the original fabric.”

On 23 July 2018, the Department of Planning and Environment as delegate of the Greater Sydney Commission issued a Gateway determination supporting the progression of the Planning Proposal subject to conditions.

The original Planning Proposal submitted by the applicant proposed to delist 29 and 31 Marion Street. While the delisting of these two sites was supported by Council, the Gateway Determination did not support the delisting. For this reason, the proposed delisting of 29 and 31 Marion Street have been removed from the Planning Proposal as per the Gateway requirements.

The table below summarises the changes to the Planning Proposal in accordance with the Gateway conditions:

Gateway Condition	Comments
1. Prior to public exhibition:	
(a) all references to the Environmental Planning and Assessment Act 1979 in the proposal are to be updated to reflect the amended clause references as of 1 March 2018;	All references have been updated.
(b) all references and mapping regarding the delisting of local heritage items at 29 and 31 Marion Street are to be removed;	References to the delisting of 29 and 31 Marion Street have been removed.
(c) the planning proposal is to be updated to refer to the approved demolition of 37 Marion Street;	<p>Commentary on the approved demolition of 37 Marion Street has been included on pages 6 and 7 of the Planning Proposal.</p> <p>Note: the demolition was approved by the Parramatta Local Planning Panel on 10 April 2018.</p>
(d) the planning proposal is to be updated to address consistency with the Greater Sydney Plan;	The planning proposal has been updated under Section 3 to address the Greater Sydney Plan.
(e) the planning proposal is to be updated to address consistency with the Central District Plan;	The planning proposal has been updated under Section 3 to address the Central District Plan.
(f) the planning proposal is to be updated with the City of Parramatta Council logo and formatting;	As can be seen the planning proposal has been updated with the City of Parramatta formatting and the logo on the cover page.
(g) a site identification map is to be included in the proposal;	The site identification maps have been updated on pages 2 and 3 of the Planning

	<p>Proposal. Further site analysis is included in the Urban Design Report attached.</p>
<p>(h) the planning proposal is to address and justify inconsistencies with the Parramatta CBD heritage study by Urbis (2015), the HAA heritage study of interface areas (2017) and Council's response to the HAA study;</p>	<p>The attached Lonergan response addresses the inconsistencies and relationships between these reports. A summary was provided above.</p> <p>However, it is noted that as part of a response to the Gateway Determination for the Parramatta CBD Planning Proposal, Council commissioned a comprehensive Marion Street Precinct Plan which analysed the urban design and heritage in this precinct. The study concluded that an FSR of 6:1 is appropriate for this site. Council subsequently endorsed the finding of this study at its meeting on 25 November 2019.</p>
<p>(i) the planning proposal is to be amended to include an assessment of the relationship of the proposed height and floor space and resulting built form, with the local character. This assessment will need to account for the preservation of view corridors along Marion Street, visual impacts on streetscape, the retention of local character, the interface with heritage items and overshadowing issues. The proposed land use and development controls should be justified and amended accordingly, if required;</p>	<p>The Lonergan Response addresses this condition which is also reflected in the Urban Design Report. In summary:</p> <ul style="list-style-type: none"> • The view corridor from Church and Marion Street (included in Urban Design Report) illustrates that the building does not impact any view corridor. • While there are no overshadowing issues, as discussed in the Lonergan response and illustrated in the urban design report, the interface has been carefully considered. The interface of the tall building with the heritage items and setting is illustrated in the HAA Report as follows: 


	 <p>Figure A: A building of a greater height but which preserves a more appropriate setting to a house (above) is preferable to a building of greater bulk that reduces the setting (below)</p>
(j) the planning proposal is to be amended to include a maximum height of building;	The planning proposal has been amended to include a maximum building height of 80 metres.
(l) the high performance building bonus of 0.5:1 FSR is to be removed from the planning proposal; and	The high performance building bonus has been removed from the planning proposal, so that the maximum FSR achievable on the site is 6.9:1. However, Council’s endorsed position still provides for incentives to create better buildings in the CBD, by allowing a bonus of 5%. Thus the total achievable FSR on this site is 7.2:1.
(m) the planning proposal is to include a satisfactory arrangements clause for the provision of state infrastructure.	The provision of a satisfactory arrangements clause has been included in the explanation of provisions, and will be drafted at a later stage.

Table 2: Assessment against Gateway determination conditions – 23 July 2018

The updated planning proposal and urban design report were subsequently forwarded to the Department of Planning, Industry and Environment seeking endorsement and approval to exhibit in accordance with condition 2 of the Gateway determination dated 23 July 2018, which stated:

“2. An updated urban design report and planning proposal will need to be provided to the Department for approval prior to public exhibition to reflect the requirements of condition 1”.

On 27 May 2019, in issuing an altered Gateway determination, the Department determined that, subject to a number of amendments being made, the Department was satisfied that the planning proposal could proceed to public exhibition.

The required amendments are addressed below in table 3.

Gateway Requirements	Comments
<ul style="list-style-type: none"> Update the Planning Framework within the Urban Design Report to remove buildings within the CBD that are no longer proposed at the height depicted, for example, 197 Church Street; 	<p>The Planning Framework has been updated to remove buildings that are no longer proposed at the height depicted.</p>
<ul style="list-style-type: none"> Remove the reference design proposal with a 9.26:1 FSR; 	<p>The reference design proposal at 9.26:1 has been removed from the urban design report and planning proposal.</p>
<ul style="list-style-type: none"> Update the design reference to demonstrate a building with a maximum FSR of 6:1 with a design excellence bonus of 15%, as endorsed by Council, noting that the final development outcome for this site will be subject to further assessment post-exhibition and having regard to the outcomes of the Parramatta CBD planning proposal; 	<p>The reference design in the urban design report and planning proposal reflects a future building with a maximum FSR of 6:1 (plus design excellence of 15% and high performance building bonus of 5%) to a total of 7.2:1.</p> <p>It is noted that the final development outcome will be subject to further assessment post-exhibition and will have regard to the outcomes of the CBD planning proposal which was issued a Gateway determination in December 2018 (discussed below).</p>
<ul style="list-style-type: none"> The Department will consider a high performance buildings bonus for this site only if it reflects the broader CBD PP gateway conditions. Within the Parramatta CBD planning proposal the high performance buildings bonus is proposed to be 5% of the base FSR for sites with a maximum FSR of 6:1. This is less than the 0.5:1 bonus currently demonstrated. In order to include this potential bonus, the planning proposal will need to be updated and as such, the Gateway determination has been amended and is attached; and 	<p>The planning proposal has been updated to include a provision for a high performance building bonus of 5% of the base FSR, in accordance with the altered Gateway determination of 27 May 2019, which provided as follows:</p> <ol style="list-style-type: none"> <i>Delete:</i> “condition 1(l)” <p><i>and replace with a new condition 1(l):</i> “the planning proposal may be amended to include a high-performance buildings bonus that is no more than 5% of the mapped Floor Space Ratio with an explanation of the provision to be provided in the planning proposal”.</p> <p>An explanation of this provision is provided in Part 2 of this Planning Proposal.</p>

<ul style="list-style-type: none"> Provide further justification for the intended height of building based on the revised proposal and FSR provisions. 	<p>As discussed below the controls sought by the planning proposal align with the findings of the Marion Street Precinct Study which provide for an FSR of 6:1 and a height of 80 metres.</p> <p>With design excellence this provides for an FSR of 6.9:1 and height of 92 metres. Further, with the better building bonus, a total FSR of 7.2:1 can be achieved and this is reflected in the reference design that supports the planning proposal.</p> <p>Further justification for the height based on the revised FSR provisions is included below.</p>
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Table 3: Assessment against Gateway determination requirements – 27 May 2019

The amending Gateway determination of 27 May 2019 also introduced a new condition 6 as follows:

Delete:

“condition 6”

and replace with a new condition 6: “Prior to submitting the proposal to the Department for finalisation, the proposal is to be reviewed, and amended where necessary, to have regard to the Floor Space Ratio and height controls endorsed by the Gateway determination for the Parramatta CBD planning proposal and any subsequent study prepared by Council in relation to heritage and the built form controls for Marion Street. Council is to ensure that the planning proposal is consistent with the outcomes in the Parramatta CBD planning proposal”.

Note: in deleting and introducing a new condition 6, a new condition 7 was also introduced that provided a revised timeframe for the completion of the LEP to 23 January 2020. A further extension to this timeframe has been requested from the Department of Planning, Industry and Environment.

As previously discussed, the CBD planning proposal received a conditional Gateway determination on 13 December 2018, allowing the proposal to proceed subject to 34 conditions.

The amending Gateway determination in relation to the site-specific planning proposal for 33-43 Marion Street noted:

“The Department recognises that following the issue of the Gateway determination for the site, the Parramatta CBD planning proposal received a conditional Gateway. There are a number of conditions within this conditional Gateway for the broader CBD that apply to Marion Street.

Consistent with other planning proposals that have been approved in the Parramatta CBD where there is potential for policy inconsistencies, Council is required to consider the

consistency of the site-specific planning proposal with the intended outcomes for the Parramatta CBD planning proposal.”

Marion Street is located within the South-West Parramatta Interface Area, and condition (k)(i) of the CBD Planning Proposal Gateway determination is relevant as follows:

“carry out further investigations of heritage interface areas and clearly identify where there are inconsistencies between the intended outcomes in the planning proposal and the heritage reports that have been prepared. Council is to provide further information to identify where the inconsistencies exist, the extent of the inconsistencies and how they are proposed to be addressed”.

To address the above condition, Council commissioned SJB Urban Design and Planning to prepare an urban design, planning and heritage study for the Marion Street Precinct. The Study did not test the validity of the heritage listings and noted that not all have thorough statements of significance or detailed physical assessments. Detailed fabric analysis would require access to the properties which was not available.

The proposed initiatives to inform future development include, but aren't limited to:

- *Retain the existing listed heritage items: however, do not schedule the Marion Street Precinct as a heritage conservation area,*
- *Focus density and height at each end of the heritage core, to harmonise with the scale of development proposed within the Auto Alley Precinct and to frame the view corridor from Marion Street east,*
- *Deliver a through-site link between Marion Street and Peace Lane to improve north-south connectivity,*
- *Reinforce the street edge with podium developments,*
- *Maximise setback between new building and heritage buildings to minimise impacts on the heritage items and streetscape character,*
- *Preserve solar access to Marion Street and heritage items,*
- *Footpath widening along both sides of Marion Street (east of Cowper Street) with increased boundary setback (up to 3 metres) to facilitate landscaping and pedestrian movement.*

As it relates to 33-43 Marion Street, the Study recommends:

“An incentive FSR of 6:1 for sites at the eastern of Marion Street”

In adopting the Study's recommendations and core urban design principles, the CBD Planning Proposal also provides for a maximum height of 80 metres at the eastern end of Marion Street.

The Planning Proposal for 33-43 Marion Street achieves a number of the core urban design principles, including the through site link between Marion Street and Peace Lane, the setback to the adjoining heritage, and maximising pedestrian space and human movements. The development outcome rationale slightly differs, in that a tall slender tower has less of an overshadowing impact on existing and future properties to the south, provides for more open space and permeability around the development and creates a less intimidating interface with Marion Street.

The Planning Proposal has adopted the controls proposed by the CBD Planning Proposal of 6:1 and 80 metres (plus design excellence and better building bonus. The height is informed by two commercial levels, 24 storeys (in a split arrangement) and room for lift overrun and servicing.

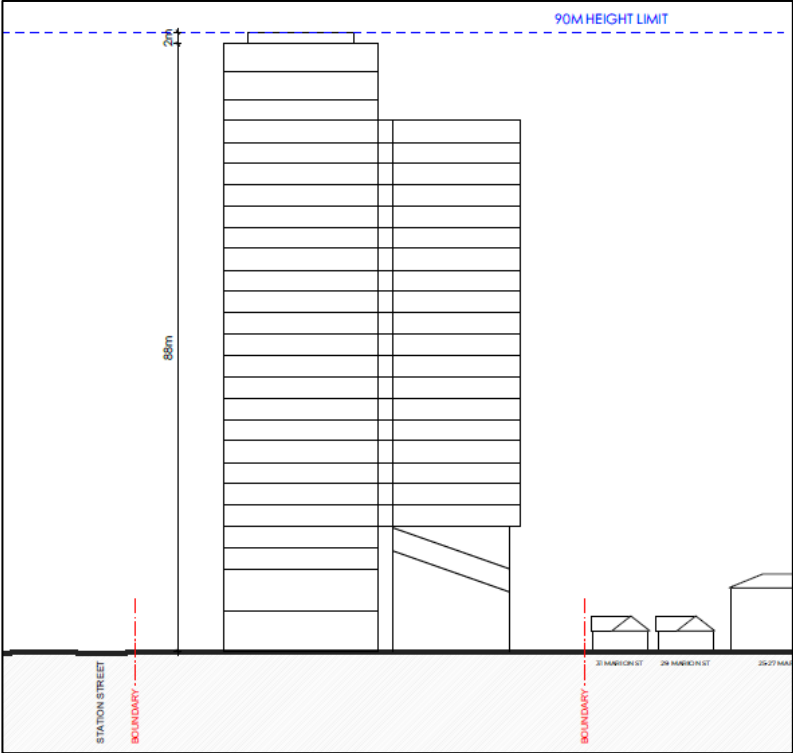


Figure 8: Indicative height and elevation diagram

PLANNING PROPOSAL

PART 1 – OBJECTIVES OR INTENDED OUTCOMES

The intended outcome for the site is to facilitate a mixed use building comprising residential levels above commercial, retail and community infrastructure uses.

The detail design of the overall building will be finalised following the Development Application process and its associated requirements. In broad terms, however the optimum built form has been identified in the attached “Urban Design Report” prepared by the proponent (Appendix 1).

The proposed amendment will facilitate an application for a tower form building with a smaller footprint to reduce the impacts of overshadowing and also create significant public pedestrian space and links throughout the site. It will also promote an increase in employment generating floorspace and community infrastructure facilities.

The main objectives of the Planning Proposal therefore include:

- To support urban growth in the Parramatta City Centre;
- To support the principle of transit orientated development by locating housing next to major public transport infrastructure;
- To support Parramatta as Sydney’s second CBD;
- To support growth within the geographic centre of Greater Sydney, provide housing and jobs for a young and diverse labour force, and facilitate an affordable urban lifestyle for future residents;
- To provide housing close to public transport for a growing workforce in Greater Sydney;
- To provide appropriate controls to facilitate a landmark building with an appropriate density for the site’s location;
- To facilitate the provision of additional housing close to public transport, the Sydney road network, jobs and employment opportunities and the Harris Park and Parramatta town centres;
- To protect the heritage core of Marion Street, to focus height and density at each end of Marion Street and harmonise scale of development proposed within the Auto Alley Precinct;
- To preserve solar access to Marion Street and heritage items; and
- To deliver a through-site link between Marion Street and Peace Lane to improve north-south connectivity.

PART 2 – EXPLANATION OF PROVISIONS

	Current PLEP 2011	Planning Proposal – Parramatta CBD	Planning Proposal
Zoning	B4	B4	B4
Height of Building	12m (“M”)	80m (“AB1”)	80m (“AB1”), excluding incentives for design excellence
FSR	2:1 (“T1”)	6:1 (“AA1”)	6:1 (“AA1”), excluding incentives for design excellence
Heritage	Yes	Yes	Remove 37 Marion Street (1731) within the subject site.

Table 4: Summary of proposed changes to planning controls

This Planning Proposal seeks to amend the *Parramatta Local Environmental Plan (LEP) 2011*, to achieve the objectives outlined in Part 1, as follows:

1. Amendment of the Parramatta Local Environmental Plan 2011 **Floor Space Ratio Map** (Sheet FSR_010) from “**T1**” (**2:1**) to “**AA1**” (**6:1**), excluding incentives for design excellence, as shown in Part 4 - Mapping.
2. Amendment of the Parramatta Local Environmental Plan 2011 **Height of Building Map** (Sheet HOB_010) from “**M**” (**12 metres**) to “**AB1**” (**80 metres**), as shown in Part 4 – Mapping.
3. Amendment of the Parramatta Local Environmental Plan 2011 Schedule 5 Environmental Heritage and the **Heritage Map** (Sheet HER_010) to delist and remove 37 Marion Street (1731)
4. Include a site-specific provision that provides for additional floor space (above that already permitted by the LEP) by up to 5 percent where development achieves certain high performing building criteria to the satisfaction of the consent authority.
5. Include a site specific provision to require satisfactory arrangements for the provision of state infrastructure.

Notes

1. Design Excellence

The provisions within the Parramatta Local Environmental Plan 2011 relating to a competitive design process for certain buildings in the Parramatta CBD will apply to the subject site. In this regard, the subject planning proposal will be subject to an architectural design competition, and a 15% development bonus if design excellence is achieved. This is because future development is likely to be greater than 55 metres (40 metres under the CBD Planning Proposal).

2. High Performing Building Bonus

Clause 7.6A of the draft written instrument of the Parramatta CBD Planning Proposal will apply to the subject site, and in accordance with the Gateway determination for 33-43 Marion Street of 27 May 2019 has been incorporated within this planning proposal. This includes additional floor space above the applicable FSR for the site by up to 5% where development achieves certain sustainability and performance criteria to be drafted in a future clause but aligns with draft Clause 7.6A of the CBD Planning Proposal.

The targets specified in the draft written instrument Clause 7.6A of the Parramatta CBD Planning Proposal are as follows;

3. *The part of any building used for the purposes of retail premises (including as part of a mixed use development), office premises, hotel or motel accommodation or serviced apartments complies with the following standards:*

- (i) the annual energy (base building) performance is within the top 15% of the performance of similar existing buildings of a similar usage type in the Sydney metropolitan region, benchmarked on an emissions (CO₂e/m²) basis at the time of application, and*
- (ii) the annual water (whole building) consumption is within the top 15% of the performance of similar existing buildings of a similar usage type in the Sydney metropolitan region, benchmarked on an net water demand (l/m²) basis at the time of application, and*
- (iii) a report prepared by a qualified consultant to the satisfaction of the Council verifies that:*
 - a. the necessary annual emissions intensity and water performance targets to meet the requirements under this subclause at the time of application have been established and confirmed, and*
 - b. the building will meet the annual energy and annual water performance targets established under this subclause, has adequate allowance (including budget) in the design of the building and its services to meet these targets, and is committed to a post occupancy verification against the targets.*

4. *The part of any building that is a dwelling, including as a part of a residential flat building or mixed use development, complies with the following higher BASIX Energy and BASIX Water standards (shown Column 2) than the minimum standards as provided in State Environmental Planning Policy (Building Sustainability Index: BASIX) 2004, which correspond to the height of the building (shown in Column 1) and its floor space ratio (also shown in Column 2), as indicated in the table to this subclause.*

Column 1 Building Height	Column 2 Higher BASIX Energy and Water Standards		
	BASIX standard	Points above minimum BASIX standard for development with a floor space ratio of 6:1 or greater, up to, but not including, 14:1	Points above minimum BASIX standard for development with a floor space ratio of 14:1 or greater
5-15 storeys	Energy	+25	+15
	Water	+15	+15
16-30 storeys	Energy	+20	+10
	Water	+15	+15
31-40 storeys	Energy	+10	+10
	Water	+15	+15
41+ storeys	Energy	+10	+10
	Water	+15	+15

The above amendments will facilitate the future redevelopment of the site in accordance with the objectives of the zone and the permissible land uses, with the consent of City of Parramatta Council and the Department of Planning, Industry and Environment.

2.1 Other relevant matters

1.1.1. Voluntary Planning Agreement

A Planning Agreement has been drafted in accordance with Council's adopted Planning Agreement's Policy which seeks to ensure that adequate community infrastructure is provided.

1.1.2. Draft DCP

A draft site-specific Development Control Plan has been prepared in accordance with the built form, setback and public domain recommendations within the SJB Marion Street Precinct Plan.

PART 3 – JUSTIFICATION

In accordance with Departmental guidelines, this section describes the reasons and justification for the proposed outcomes and development standards in the planning proposal.

Section A - Need for the planning proposal

This section establishes the need for a planning proposal in achieving the key outcome and objectives. The set questions address the strategic origins of the proposal and whether amending the LEP is the best mechanism to achieve the aims on the proposal.

1. Is the Planning Proposal a result of any study or report?

Not directly, however the Planning Proposal for the Parramatta CBD places the site within the City Centre – South Precinct as part of a city-wide review of controls for the CBD area as set out in the Parramatta CBD Planning Strategy. The strategy identifies an incentive FSR of 6:1 and incentive height of 80 metres for the subject site.

An urban design analysis was prepared which concluded that a large building opposite the station could be supported that provided a landmark building, minimal impacts, through site links and activated ground floor uses. This is also consistent with the findings of the SJB Marion Street Precinct Study.

Therefore, through the studies prepared in support of the Planning Proposal, the amendment to the Parramatta Local Environment Plan 2011 principal development controls and heritage mapping is justified and has site specific and strategic planning merit for the following reasons:

- The site is within the Parramatta CBD, Sydney's central city.
- The site is located opposite a piece of major transport infrastructure, being Harris Park train station, the site is also located only 600 metres from Parramatta train station.
- The site is also close to the arterial road network, the M4 Western Motorway and the Parramatta Road urban renewal corridor.
- Strategically the site is extremely well located to meet the objectives for urban renewal in accordance with the Greater Sydney Plan, the Central District Plan, the Greater Parramatta and Olympic Peninsula Growth Area, and the Parramatta CBD Planning Strategy.
- Detailed heritage analysis has been provided by the thorough assessment conducted applying the protocols of the NSW Heritage Manual contained in the John Oultram and Cracknell Lonergan reports (attached).
- The draft CBD Planning Proposal provides for an FSR of up to 6:1 at the eastern end of Marion Street and also includes heights of up to 100 metres with FSR's of 10:1 to the west

of Marion Street, including land on Anderson Street that abuts heritage items. This is an acknowledgement, supported by numerous examples throughout the Parramatta CBD that heritage and taller buildings can interface and abut with sensitive urban design and architecture.

- The site is a large amalgamated parcel of land, greater than 2000sq.m with a large frontage to Marion Street. The urban design analysis for the subject site therefore, presents a concept for a tall and slender tower. This has been proposed and will be facilitated by the proposed controls for the following reasons:
 - To mitigate any overshadowing to the south of the site, and ensure a fast-moving shadow would provide sun access to surrounding residential properties.
 - To provide for ground floor open space, through links and active frontages to create a strong public realm through to the train station.
 - To define the end of Marion Street, create an entry point from the train station, and a logical extension of tall buildings on the east side of Cowper Street.
 - The concept of a tall building next to or nearby smaller heritage items is not unusual or uncommon, particularly throughout the Parramatta CBD, with example of buildings even cantilevering over heritage items.
- The detailed heritage and fabric analysis undertaken by the heritage consultant and the additional autonomous expert assessment underpins the development controls and delisting's sought by this Planning Proposal.
- A response to the Gateway conditions prepared by Peter Lonergan has found that the concept and controls generally align with that of the HAA Report in relation to transition i.e. tall buildings next to heritage items in a CBD. The complete response is attached.
- The SJB Marion Street Precinct Study supports the controls sought by this Planning Proposal.

2. Is the Planning Proposal the best means of achieving the objectives or intended outcomes, or is there a better way?

The Planning Proposal is the most appropriate means of achieving the stated objectives and intended outcomes.

Section B – Relationship to strategic planning framework

This section assesses the relevance of the Planning Proposal to the directions outlined in key strategic planning policy documents. Questions in this section consider state and local government plans including the Greater Sydney Commission's Greater Sydney Region Plan – A Metropolis of Three Cities, the Central City District Plan, State Environmental Planning Policies, local strategic and community plans and applicable Ministerial Directions.

3. Is the planning proposal consistent with the objectives and actions contained within the applicable regional or sub-regional strategy?

Greater Sydney Region Plan – A Metropolis of Three Cities

In March 2018, the Greater Sydney Commission released The Greater Sydney Region Plan: A Metropolis of Three Cities, the new strategic document to bring to life the vision of Greater Sydney as a vibrant and sustainable metropolis of the Eastern Harbour City, Central River City and Western Parkland City.

The Plan is built on a vision of three cities where most residents live within 30 minutes of their jobs, education and health facilities, services and great places. The three cities include:

- the Western Parkland City
- the Central River City
- the Eastern Harbour City.

The subject site is within the Central River City. The population of the Central River City is projected to increase from 1.3 million people to 1.7 million people over the next 20 years. This will transform many parts of the city from a suburban to an urban environment.

The Metropolitan Centre of Greater Parramatta is the core of the Central River City, which encompasses the Parramatta CBD, North Parramatta and Westmead and Parramatta Park.

Unprecedented public and private investment is contributing to new transport such as the Metro West rail link delivering faster and more efficient transport from the Harbour CBD to Greater Parramatta.

The subject site is to the south of the Parramatta CBD, approximately 500 metres from the Parramatta train station. It also adjoins the Harris Park station and is therefore in the heart of Parramatta. The site is ideally situated to accommodate and contribute to the new neighbourhoods and urban renewal envisaged by the Greater Sydney Plan.



Figure 9: Structure Plan for Metropolis of Three Cities

The Greater Sydney Plan identifies ten directions for the three cities to deliver and monitor the objectives to create a liveable, productive and sustainable City. These include:

1. A city supported by infrastructure
2. A collaborative city
3. A city of people
4. Housing the city
5. A city of great places
6. A well-connected city
7. Jobs and skills for the city
8. A city in its landscape
9. An efficient city
10. A resilient city

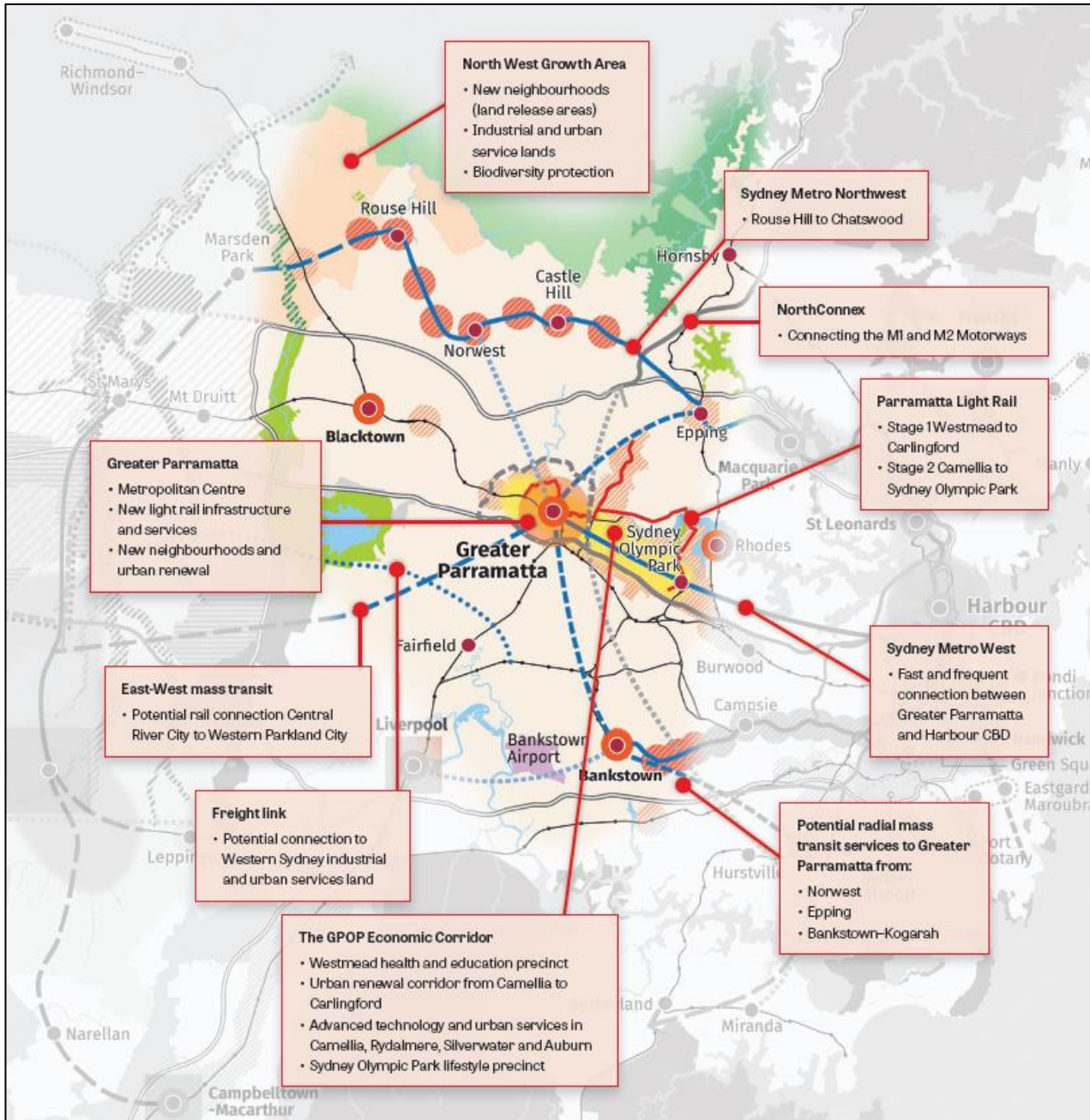


Figure 10: Central River City Structure Plan

To achieve the objectives for the Central River City, the plan includes 10 directions and 40 objectives, supporting actions and priorities for each “City”. Relevant directions and objectives with which this Planning Proposal is consistent include:

DELIVERING AND MONITORING THE PLAN - OBJECTIVES		
A CITY SUPPORTED BY INFRASTRUCTURE		
1	Infrastructure supports the Three Cities	<p>Consistent</p> <p>The Planning Proposal will facilitate housing, jobs and employment opportunities in the Central River City. The site is well connected to public and private transport infrastructure connecting future residents and jobs to Greater Sydney and the other Cities.</p> <p>Place based priorities will also continue to be considered as growth and change is experienced in and around Greater Parramatta and the Central River City. This includes upgrades to the M4 Western Motorway, the construction of WestConnex, and Sydney Metro West.</p> <p>Notwithstanding all the major investments in infrastructure, the site has excellent existing access to infrastructure due to its central location.</p>
2	Infrastructure aligns with forecast growth – growth infrastructure compact	
3	Infrastructure adapts to meet future needs	
4	Infrastructure use is optimised	
A COLLABORATIVE CITY		
5	Benefits of growth realised by collaboration of governments, community and business	<p>The Planning Proposal seeks to facilitate a mixed use development within the Parramatta CBD close to transport, jobs and community facilities. This will support the emergence of the southern end of the CBD and support the growth of this area. Consultation with the community during the Part 3 plan making and Part 4 DA processes will assist understand the needs and requirements of existing and future residents and employees in the area.</p>
A CITY FOR PEOPLE		
6	Services and infrastructure that reflects the needs of the community now and in the future	<p>While the site is within the Parramatta CBD it is also within walking distance of major transport, employment opportunities, shopping, recreation and open space. This builds the social networks and enhances individual and community health.</p> <p>The current controls on the site do not reflect the changing and envisaged built form for this part of the CBD and the opportunities associated with being so close to significant amenities.</p> <p>The proposed mixed-use development of the site seeks to improve physical, social and spatial accessibility for the local community.</p> <p>While the Planning Proposal only seeks to amend the planning controls to facilitate future development applications, the mixed use development will be designed to be a place accessible by all people including older people and people with a disability.</p>
7	Communities are healthy, resilient and socially connected	
8	Greater Sydney’s communities are culturally rich with diverse neighbourhoods	
9	Greater Sydney celebrates the arts and supports creative industries and innovation	

		As the planning and development of the site progresses a place-based planning approach will be able to be applied to ensure cultural diversity in the community is recognised and future land uses respond to the different ways in which people of all cultures and linguistic backgrounds engage and contribute to the community.
HOUSING THE CITY		
10	Greater housing supply	<p>The site currently accommodates three commercial buildings and three dwelling houses. The Planning Proposal will accommodate approximately 186 dwellings and 1,360sq.m of commercial floorspace in an ideal location. While number 37 Marion Street is heritage listed, it's lack of heritage significance has been tested during a Part 4 development application process and demolition approved. The relationship and interface of future development with other heritage in the area has been extensively discussed in the supporting documentation.</p> <p>The Planning Proposal therefore supports additional housing in a strategically identified location creating a place with access to public transport and jobs, connecting homes with work; a place that is safe and attractive and is characterised by quality urban design and architecture.</p> <p>Further, the Greater Sydney Commission will work with Council and public agencies to prepare 6-10 year housing targets. The NSW Government has identified that 725,000 additional homes will be needed by 2036 to meet demand based on current population projections. The Central River City, within which the site is located, has a housing supply target of 53,500 from 2016-2021 and 207,500 to 2036. The Planning Proposal supports these objectives of greater housing supply.</p>
11	Housing is more diverse and affordable	
A CITY OF GREAT PLACES		
12	Great places that bring people together	<p>The Planning Proposal while not seeking development consent will facilitate future development applications. This stage in the planning will set the future land use controls and zoning to allow for the design of future buildings, streets and spaces.</p> <p>The proposed development concept seeks to facilitate a strong ground floor interface with the public realm, given its location so close to the Harris Park train station. It is intended to</p>

		<p>become a focal point for the locality, somewhere that fosters community pride.</p> <p>The principles of ‘Great places that bring people together’ will be invaluable to achieving a vibrant pedestrian orientated environment, that is accessible and easy to move within and around.</p> <p>The commercial and retail component will ensure a vibrant and interesting public realm that is safe and inviting for all members of the community.</p>
13	Environmental heritage is identified, conserved and enhanced	<p>As previously discussed, the site contains a heritage item that has a demolition approved. The Planning Proposal seeks to remove the listing.</p> <p>The heritage analysis finds that a tower can sit comfortable next to heritage items, something that is common within the CBD already, and will be a common reality within this area of the CBD in coming years. Architectural design and ground floor interface will be important however, and should be further interrogated during the DA stage.</p>
A WELL CONNECTED CITY		
14	A Metropolis of Three Cities – integrated land use and transport creates walkable and 30-minute cities	<p><i>“A 30 – minute city is where most people can travel to their nearest metropolitan centre or cluster by public transport within 30 minutes; and where everyone can travel to their nearest strategic centre by public transport seven days a week to access jobs, shops and services”.</i></p> <p>The site is located 600 metres from the Parramatta train station and core of the CBD. This is walkable in just a few minutes. Trains are highly frequent. The bus station here also provides access to other areas of Greater Sydney.</p> <p>The site also adjoins Harris park station, and while not as frequent connects the site in a matter of seconds to public transport.</p> <p>In terms of private transport, the upgrades to the M4 Western Motorway have been completed and the construction of WestConnex is well advanced. When complete, the site will have excellent access to Sydney’s arterial road network.</p> <p>The subject site is well located in proximity to future infrastructure, such as the Metro West rail line and WestConnex.</p>
15	The Eastern, GOP and Western Economic Corridors are better connected and more competitive	
16	Freight and logistics network is competitive and efficient	
17	Regional connectivity is enhanced	
JOBS AND SKILSS FOR THE CITY		
18	Harbour CBD is stronger and more competitive	N/A

19	Greater Parramatta is stronger and better connected	The subject site will benefit from the construction of WestConnex, Sydney Metro West and the Parramatta Light Rail, connecting the site; the Parramatta CBD, Greater Parramatta and the GPOP to the rest of Greater Sydney and regional NSW.
20	Western Sydney Airport and Badgerys Creek Aerotropolis are economic catalysts for Western Parkland City	N/A
21	Internationally competitive health education research and innovation precincts	<p>The planning proposal will support this objective by providing additional jobs within 30 minutes of employment precincts providing an additional workforce to support economic growth. Parramatta is identified by the Greater Sydney Region Plan as a Metropolitan Centre and Westmead as a Health and Education Precinct. The subject site is within the Parramatta CBD and a short distance from Westmead.</p> <p>The future development will become a local a focal point for the community and a location that includes jobs, retail, goods and services and local activity. It is of a scale that serves this part of the CBD in a mixed use zone.</p> <p>Many of the principles for activity in Centres will be adopted in the development phase of the project to ensure an attractive and safe place, efficient movement of people and traffic and walkable neighbourhoods with good accessibility and permeability.</p>
22	Investment and business activity in centres	
23	Industrial and urban services land is planned, retained and managed	
24	Economic sectors are targeted for success	
A CITY IN ITS LANDSCAPE		
25	The coast and waterways are protected and healthier	N/A
26	A cool and green parkland city in the South Creek corridor	N/A
27	Biodiversity is protected, urban bushland and remnant vegetation is enhanced	Consistent
28	Scenic and cultural landscapes are protected	<p>The subject site adjoins two heritage items and is within the vicinity of a heritage conservation zone.</p> <p>The relationship of the proposal and tower point build form has been extensively assessed against the Council's Urbis Report, the HAA Report, the Council response and the SJB Marion Street Precinct Study. The Peter Lonergan response (attached) ties these various reports together to consider the impact on the cultural landscape and the interface with adjoining areas.</p> <p>Nevertheless, the ground plain is important to how it relates to adjoining development and the</p>

		concept has been designed to ensure the ground level interface is sensitive and not overbearing. This minimises bulk, which is a key factor of the HAA Report. In relation to height, this is considered acceptable due to the shape and bulk of the building. The view analysis also demonstrates a minimal impact especially when included in the context of the Parramatta CBD rather than in isolation.
29	Environmental, social and economic values in rural areas are protected and enhanced	N/A
30	Urban tree canopy cover is increased	A detailed Landscape Plan is included as part of the application. Given the focus on the public realm and the relationship of future development to the streetscape, tree planting and landscape is of the highest importance. This will be further enhanced and refined during the DA process.
31	Public open space is accessible, protected and enhanced	The site is within close proximity to Jubilee Park, being approximately 200 metres walking distance, and Rosella park on the east of the railway station. Links through the railway station provide good connectivity, and excellent way finding in Parramatta provide good access to other nearby open space such as Robin Thomas Reserve to the north and Parramatta Park to the north west.
32	The Green Grid links parks, open spaces, bushland and walking and cycling paths	
AN EFFICIENT CITY		
33	A low-carbon city contributes to net zero emissions by 2050 and mitigates climate change	With good access to nearby public transport and proximity to metropolitan clusters and health and education precincts the development seeks to achieve the objective of reducing trip generation and car dependency. This is also achieved through the small commercial/retail component of the centre which will provide job and employment opportunities and convenience retail, further encouraging resident retention in the area and reducing car dependency.
34	Energy and water flows are captured, used and re-used	Consistent The Planning Proposal seeks to incorporate high performing building bonuses should environmental target be achieved at development application stage.
35	More waste is re-used and recycled to support the development of a circular economy	N/A
A RESILIENT CITY		

36	People and places adapt to climate change and future shocks and stresses	Consistent The Planning Proposal includes a high performing building bonus, whereby an additional 5% floor space can be achieved where certain sustainability and performance criteria is met. Such incentives can produce better buildings and it is important that Parramatta CBD leads the way with unprecedented development.
37	Exposure to natural and urban hazards is reduced	
38	Heatwaves and extreme heat are managed	

Table 5: Consistency with the Greater Sydney Region Plan – A Metropolis of Three Cities

Central City District Plan

Greater Sydney’s three cities identified in the Greater Sydney Region Plan – A Metropolis of Three Cities reach across five districts. The Central City District is forecast to grow substantially, capitalising on its location close to the geographic centre of Greater Sydney. It incorporates the local government areas of The Hills, Blacktown, Parramatta and Cumberland.

Greater Parramatta – the metropolitan centre – is the core of the Central River City and Central City District. Its economy is centred on world-class health, education and research institutions as well as finance, business services and administration. Greater Parramatta and the Olympic Peninsula (GPOP) – taking in the Westmead health and education precinct; advanced technology and urban services in Camellia, Rydalmere, Silverwater and Auburn; and the Sydney Olympic Park lifestyle precinct – will be supported by the Parramatta Light Rail and Sydney Metro West.

The Central City District Plan was released in March 2018 to set the priorities and actions for improving the quality of life for residents as the district grows and changes.

“The vision for Greater Sydney as a metropolis of three cities means residents in the Central City District will have quicker and easier access to a wider range of jobs, housing types and activities as part of the transformation of their District. The vision will improve the District’s lifestyle and environmental assets.



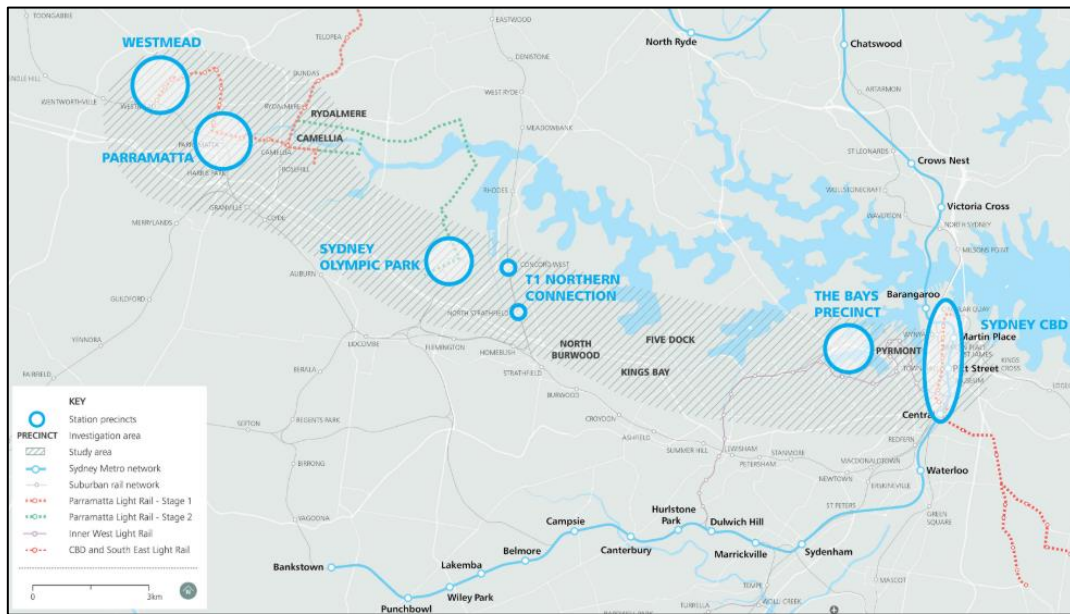
	Metropolitan Centre		South Creek Parkland Investigation
	Health and Education Precinct		Green Grid Priority Corridor
	Strategic Centre		Train Station
	Local Centre		Committed Train Link
	Economic Corridor		Train Link/Mass Transit Investigation 0-10 years
	Western Sydney Employment Area		Train Link/Mass Transit Investigation 10-20 years
	Industrial Land		Train Link/Mass Transit Visionary
	Land Release Area		Freight Rail Investigation
	Transit Oriented Development		City Serving Transport Corridor
	Urban Renewal Area		Light Rail
	Greater Parramatta to Eastern Creek Growth Area		Motorway
	Urban Area		Committed Motorway
	Protected Natural Area		Road Investigation 10-20 years
	Metropolitan Rural Area		Road Visionary
	Major Urban Parkland Including National Parks and Reserves		District Boundary
	Waterways		

Figure 11: Central City District Structure Plan

Consistency with the Central City District planning priorities and indicators is considered in Table 5 below:

A COLLABORATIVE CITY		
DIRECTION: WORKING TOGETHER TO GROW A GREATER SYDNEY		
P.I	<u>Potential Indicator:</u> Increased use of public resources such as open space and community facilities	The Greater Sydney Commission is collaborating with local councils to improve regional open space and deliver Greater Sydney’s Green Grid through the administration and management of the Metropolitan Greenspace Program. Further, Jubilee Park is within 200 metre walking distance to the north west and Rosella Park is 400 metres walking distance to the east (on the other side of the railway station). James Ruse Reserve, Ollie Webb Reserve and Parramatta Park are also within walking distance.
C.1	<u>Planning Priority C1</u> Working through collaboration	Consistent
A CITY SUPPORTED BY INFRASTRUCTURE		
DIRECTION: INFRASTRUCTURE SUPPORTING NEW DEVELOPMENTS		
P.I	<u>Potential Indicator:</u> Increased 30-minute access to a metropolitan centre/cluster	Parramatta is identified by the Greater Sydney Region Plan as a Metropolitan Centre and Westmead as a Health and Education Precinct. The subject site is within the Parramatta CBD and a short train ride to Westmead. The Parramatta train station and the core of the CBD is 600 metres away or a short walk. Therefore, the redevelopment of this site meets this objective and supports the vision to provide homes close to jobs, employment, education, health, retail, recreation and education. The site is very well placed to deliver this.
C.2	<u>Planning Priority C2</u> Planning for a city supported by infrastructure	The Planning Proposal will facilitate housing, jobs and employment opportunities in the Central River City. The site is well connected to public and private transport infrastructure connecting future residents and jobs to Greater Sydney and the other Cities. Place based priorities will also continue to be considered as growth and change is experienced in and around Greater Parramatta and the Central River City. This includes upgrades to the M4 Western Motorway, the construction of WestConnex, and Sydney Metro West.

Notwithstanding all the major investments in infrastructure, the site has excellent existing access to infrastructure due to its central location.



A CITY FOR PEOPLE
DIRECTION: CELEBRATING DIVERSITY AND PUTTING PEOPLE AT THE HEART OF PLANNING

P.I

Potential Indicator:
 Increased walkable access to local centres

Consistent
 The site is within the Parramatta CBD. The development concept will also provide commercial/retail space which could support

		local conveniences such as a café or small shop for the local community, which also creates a destination for commuters and transport users to and from the station.
C.3	<u>Planning Priority C3</u> Providing services and social infrastructure to meet people's changing needs	Consistent As discussed above the zoning is for mixed-use and the development concept provides commercial/retail space to potentially providing some services and social infrastructure, noting the proximity to the Harris Park centre and the Parramatta core.
C.4	<u>Planning Priority C4</u> Fostering healthy, creative, culturally rich and socially connected communities	Consistent
HOUSING THE CITY		
DIRECTION: GIVING PEOPLE HOUSING CHOICES		
P.1	<u>Potential Indicator:</u> Increased housing completions (by type)	Consistent The 5-year housing supply target for Parramatta local government area to 2021 is 21,650. The concept plan associated with the Planning Proposal has the capacity to accommodate an additional approximately 186 dwellings in this time at an FSR of 7.2:1 (design excellence and high performing building bonuses).
	Number of councils that implement Affordable Rental Housing Target Schemes	N/A
C.5	<u>Planning Priority C5</u> Providing housing supply, choice and affordability with access to jobs, services and public transport	Consistent The Planning Proposal facilitates housing supply and choice within an affordable housing product as part of a mixed-use development. While creating jobs and homes, it also supports the local economy. It adjoins a train station and is 500 metres from the Parramatta CBD/Metropolitan Centre train station.
A CITY OF GREAT PLACES		
DIRECTION: DESIGNING PLACES FOR PEOPLE		
P.1	<u>Potential Indicator:</u> Increased access to open space	Consistent Further, Jubilee Park is within 200 metre walking distance to the north west and Rosella Park is 400 metres walking distance to the east (on the other side of the railway station). James Ruse Reserve, Ollie Webb Reserve and Parramatta Park are also within walking distance.
C.6	<u>Planning Priority C6</u>	The Planning Proposal is informed by a concept that will be further refined during the

	Creating and renewing great places and local centres, and respecting the District's heritage	development application process. This will include design principles to ensure that the mixed use development is a great place for residents and the local community. While the planning proposal seeks to delist 37 Marion Street, which has a demolition approval, the site does have other items of heritage nearby. The conservation area to the east is remarkable and worthy of listing. No other changes to the heritage schedule are proposed and therefore the relationship to the areas heritage has been heavily studied and discussed throughout this planning proposal and the supporting studies/reports.
A WELL CONNECTED CITY		
DIRECTION: DEVELOPING A MORE ACCESSIBLE AND WALKABLE CITY		
P.1	<u>Potential Indicator:</u> Percentage of dwellings located within 30 minutes by public transport of a metropolitan centre/ cluster	Consistent The site is within the Parramatta CBD or Metropolitan Centre.
	Percentage of dwellings located within 30 minutes by public transport of a strategic centre	Consistent
C.7	<u>Planning Priority C7</u> Delivering integrated land use and transport planning and a 30-minute city	Consistent
JOBS AND SKILLS FOR THE CITY		
DIRECTION: CREATING THE CONDITIONS FOR A STRONGER ECONOMY		
P.1	<u>Potential Indicator:</u> Increased jobs in metropolitan and strategic centres	Consistent The supply of housing and population associated with the planning proposal will support the Parramatta Metropolitan centre by providing an available workforce in close proximity to the Greater Parramatta and Olympic Peninsula economy corridor grows.
C.8	<u>Planning Priority C8</u> Growing a stronger and more competitive Greater Parramatta	Consistent The future development will support the businesses within Greater Parramatta and the Olympic Peninsula, having such close access to the Parramatta core and major rail infrastructure. This reduces trips and creates a more competitive business environment.
C.9	<u>Planning Priority C9</u> Delivering a more connected and competitive GOPP economic corridor	Consistent
C.10	<u>Planning Priority C10</u>	Consistent

	Growing investment, business and job opportunities in strategic centres	
C.11	<u>Planning Priority C11</u> Maximising opportunities to attract advanced manufacturing and innovation in industrial and urban services land	N/A
C.12	<u>Planning Priority C12</u> Supporting growth of targeted industry sectors	Consistent
A CITY IN ITS LANDSCAPE		
DIRECTION: VALUING GREEN SPACES AND LANDSCAPE		
P.I	<u>Potential Indicator:</u> Increased urban tree canopy	Detailed concepts for public planting will be created and supported by a detailed Landscape Plan at development application stage.
	Expanded Greater Sydney Green Grid	Consistent.
C.13	<u>Planning Priority C13</u> Protecting and improving the health and enjoyment of the District's waterways	N/A
C.14	<u>Planning Priority C14</u> Creating a Parkland City urban structure and identity, with South Creek as a defining spatial element.	N/A
C.15	<u>Planning Priority C15</u> Protecting and enhancing bushland, biodiversity and scenic and cultural landscapes	N/A
C.16	<u>Planning Priority C16</u> Increasing urban tree canopy cover and delivering Green Grid connections	Consistent Discussed above
C.17	<u>Planning Priority C17</u> Delivering high quality open space	The associated Planning Agreement provides for a monetary contribution to be used by Council towards public domain improvements in the Parramatta CBD.
C.18	<u>Planning Priority C18</u> Better managing rural areas	N/A
AN EFFICIENT CITY		
DIRECTION: USING RESOURCES WISELY		
P.I	<u>Potential Indicator:</u> Reduced transport related greenhouse gas emissions	With good access to nearby public transport and proximity to metropolitan and strategic centres and the employment opportunities

	Reduced energy use per capita	associated with the Parramatta CBD, the planning proposal seeks to achieve the objective of reducing trip generation and car dependency.
C.19	<u>Planning Priority C19</u> Reducing carbon emissions and managing energy, water and waste efficiently	The commercial/retail component of the centre will provide job and employment opportunities for local residents and reduce movements. All these aspects encourage retention in the area and reduce car dependency. The Planning Proposal is also seeking to introduce high performing building bonuses to encourage more sustainable and efficient building.
A RESILIENT CITY		
DIRECTION: ADAPTING TO A CHANGING WORLD		
P.I	Number of councils with standardised state-wide natural hazard information	N/A
P.20	<u>Planning Priority W20</u> Adapting to the impacts of urban and natural hazards and climate change	Consistent

Table 6: Consistency with the Central City District Plan

Greater Parramatta and the Olympic Peninsula

In October 2016 the Greater Sydney Commission released its draft vision for the Greater Parramatta Olympic Peninsula (GPOP) to direct Greater Sydney’s growth and shape the Greater Sydney of tomorrow.

The GPOP is a 4,000 hectare area of land in Greater Sydney and spans 13 km east–west from Strathfield to Westmead, and 7 km north–south from Carlingford to Lidcombe and Granville. GPOP is the geographic and demographic centre of Greater Sydney.

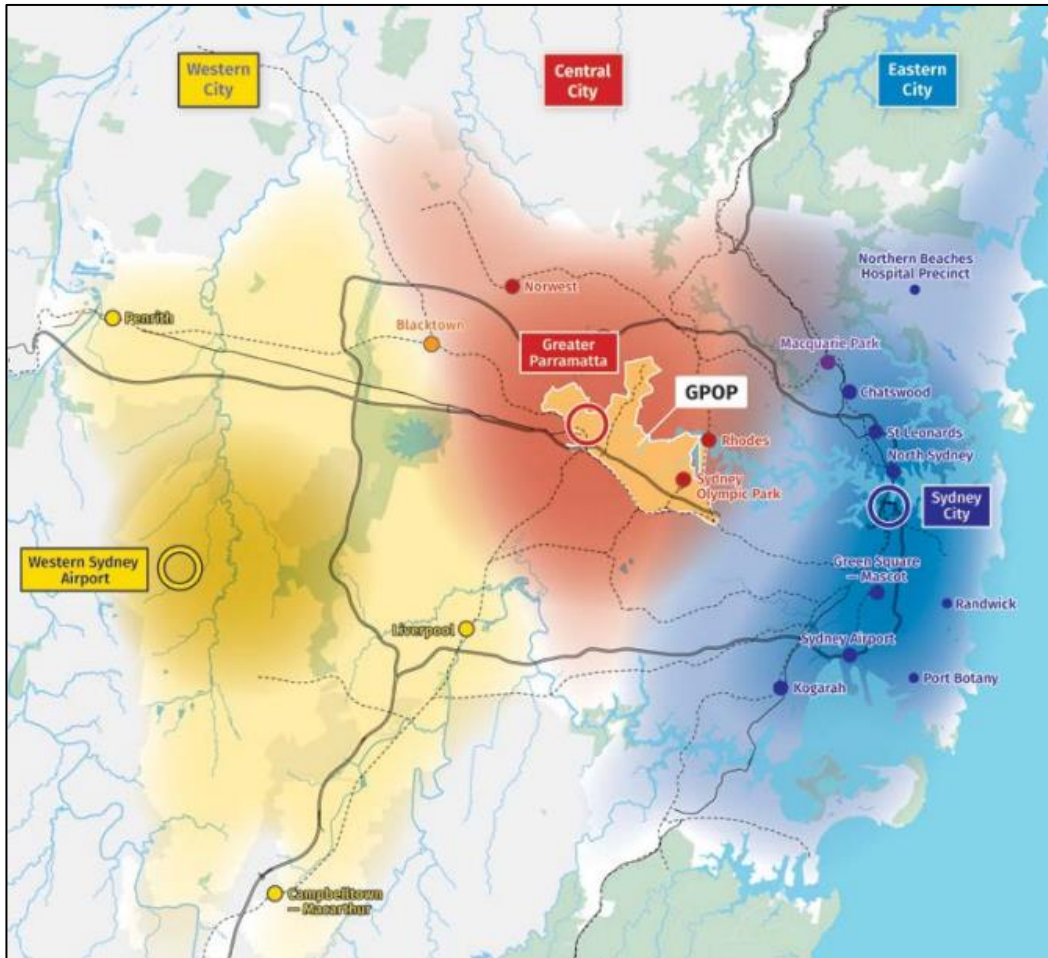


Figure 12: Location of GPOP

The subject site is identified within Quarter 1: the Parramatta CBD Westmead Health and Education Precinct. The key objectives of this Quarter are to:

- Grow the Westmead health and education precinct as a world-class innovation district;
- Increase the attractiveness and productivity of Parramatta CBD; and
- Coordinate and optimise urban renewal opportunities to deliver greater liveability outcomes.

In November 2019, the draft Greater Parramatta and Olympic Peninsula (GPOP) Place-based Infrastructure Compact Pilot (PIC) was released for public comment and feedback by the greater Sydney Commission. The PIC is a “strategic planning model that looks holistically at a place to better align growth with the provision of infrastructure”.

The PIC proposed 26 Precincts within GPOP and high-level sequencing for the alignment of growth with the provision of infrastructure. 33-43 Marion Street is within the Parramatta South Precinct which falls under proposed action 1 – to “focus on precincts where growth can be aligned with already committed infrastructure to support job creation and new development”.

This precinct was assessed as being a strategic precinct to facilitate development and land use changes aligned with investment in services and infrastructure. It was found to be more cost-effective than other precincts in GPOP. The Planning Proposal therefore aligns with and is consistent with the PIC.

As identified above, the planning proposal is an urban renewal opportunity within the Parramatta CBD, supporting housing growth and choice, and providing an available workforce for business

growth. It also provides good proximity to health and education associated with the Westmead Precinct.

Urban Design Report

In addition to the strategic merit of the proposal, the UDR (Appendix 1) also examines the proposal in terms of its relationship to other centres. While Harris Park is within the Parramatta CBD, it is assessed in its own right against other centres in the region (03 Planning Framework – HOB around transport hubs).

The hierarchy of centres is appropriate in this CBD context. The UDR also examines the range of building heights in the CBD and the potential heights achieved under the proposal in no way diminishes from the status of the commercial core area of the CBD which has buildings of between 100m and 200m in height and much greater FSR controls. Section 03 “Massing Comparison” provides a powerful 3D image of the proposal within the CBD context, illustrating the suitability of the project.

4. Is the planning proposal consistent with the local council’s Community Strategic Plan or other local strategic plan?

The following strategic planning documents are relevant to the planning proposal.

Planning Proposal Parramatta CBD (Amendment to Parramatta LEP 2011):

In recognition of Parramatta’s growing role, Council resolved in 2013 to prepare a study based on world’s best practice to identify how Parramatta City Council can develop and implement a planning framework to create a world class city. This resulted in the Parramatta CBD Planning Strategy which underpins the proposed LEP amendments.

Several actions within the Parramatta CBD Planning Strategy were outlined and these led to the Parramatta CBD Planning Strategy’s Implementation Plan. These are noted in Council’s CBD Planning Proposal and need not be restated here. Sufficient to note is that a range of specialist studies would be required within the CBD. Relevantly to this Proposal they included urban design modelling, heritage studies and a needs analysis of community infrastructure. This proposal has completed a revised urban form for the site and has undertaken a comprehensive heritage study on the site and the locality.

The proposal is consistent in that it is seeking to increase density controls for the subject site and the entire CBD. This proposal seeks to amend the potential yield being considered.

This site is also within an area that the Strategy identified as “*subject to further urban design refinement*”. While this Planning Proposal has carried out this refinement and offers the proposed new site controls on the basis of this work, the SJB commissioned Marion Street Precinct Plan has also come to similar conclusions for the site, noting that it did not examine heights and densities greater than 80 metres and 6:1.

Parramatta 2038 Community Strategic Plan

The proposal will assist in the attainment of many of the objectives in the Parramatta 2038 Community Strategic Plan. The Plan itself seeks to implement some big vision into 2038 which will be its centenary as a City. This vision has large aims involving the establishment of riverfront parklands and entertainment precincts, light rail systems and strong employment centres.

For this vision to be achieved centres must be allowed to develop with people living in them which in turn will foster a strong diversity and sense of community. From this foundation the vision can be met.

This proposal provides the appropriate density at a location that will help achieve this vision. This site is over the road from a railway station, in proximity to bus services and ring-road connections. This proposal supports this initiative. The attached Economic Assessment demonstrates the extent of investment that the proposal will introduce.

5. Is the planning proposal consistent with the applicable State Environmental Planning Policies?

The following State Environmental Planning Policies (SEPPs) are of relevance to the site.

State Environmental Planning Policies (SEPPs)	Consistent:	Comment
SEPP No 1 Development Standards	N/A	This SEPP is not applicable to the subject land under Clause 1.9 of the Parramatta LEP 2011.
SEPP No 55 Remediation of Land	YES	No known contamination exists on the site. To be further considered at development application stage, noting that the site contains approval for demolition both via development application approval and a complying development certificate.
SEPP 60 – Exempt and Complying Development	N/A	N/A
SEPP 64 – Advertising and Signage	N/A	Not relevant to proposed amendment. May be relevant to future DAs.
SEPP No 65 Design Quality of Residential Flat Development	YES	Detailed compliance with SEPP 65 will be demonstrated at the time of making a development application for the site facilitated by this Planning Proposal. During the design development phase, detailed testing of SEPP 65 and the Residential Flat Design Code was carried out and the indicative scheme is capable of demonstrating compliance with the SEPP.
SEPP No.70 Affordable Housing (Revised Schemes)	N/A	Not relevant to proposed amendment.
SEPP (Affordable Rental Housing) 2009	N/A	Not relevant to proposed amendment.
SEPP (BASIX) 2004	N/A	Detailed compliance with SEPP (BASIX) will be demonstrated at the time of making a development application for the site facilitated by this Planning Proposal.
SEPP (Exempt and Complying Development Codes) 2008	YES	May apply to future development of the site.
SEPP (Infrastructure) 2007	YES	May apply to future development of the site.

Sydney Regional Environmental Plan No 18– Public Transport Corridors	N/A	N/A
Sydney Regional Environmental Plan (Sydney Harbour Catchment) 2005	N/A	Not relevant to proposed amendment.
SEPP (Urban Renewal) 2010	YES	The Planning Proposal will stimulate renewal of a underutilised site and will contribute to the housing, employment and job targets for the area.

Table 7 – Consistency of planning proposals with relevant SEPPs

6. Is the planning proposal consistent with applicable Ministerial Directions (s.9.1 directions)

In accordance with Clause 9.1(2) of the *EP&A Act 1979* the Minister issues directions for the relevant planning authorities to follow when preparing planning proposals for new LEPs. The directions are listed under the following categories:

- Employment and resources
- Environment and heritage
- Housing, infrastructure and urban development
- Hazard and risk
- Regional planning
- Local plan making

The following directions are considered relevant to the subject Planning Proposal.

Section	Comment	Compliance
1. Employment and Resources		
Direction 1.1 – Business and Industrial Zones	<p><i>The objectives of this direction are:</i></p> <p><i>(a) encourage employment growth in suitable locations,</i></p> <p><i>(b) protect employment land in business and industrial zones, and</i></p> <p><i>(c) support the viability of identified strategic centres.</i></p> <p><i>This direction applies when a relevant planning authority prepares a planning proposal that will affect land within an existing or proposed business or industrial zone (including the alteration of any existing business or industrial zone boundary).</i></p> <p><i>This Direction aims to preserve such lands, however a planning proposal may be inconsistent with the terms of this direction only if the relevant planning authority can satisfy the Director-General of the</i></p>	Yes

	<p><i>Department of Planning (or an officer of the Department nominated by the Director-General) that the provisions of the planning proposal that are inconsistent are:</i></p> <p><i>(a) justified by a strategy which:</i></p> <p><i>(i) gives consideration to the objective of this direction, and</i></p> <p><i>(ii) identifies the land which is the subject of the planning proposal (if the planning proposal relates to a particular site or sites), and</i></p> <p><i>(iii) is approved by the Director-General of the Department of Planning, or</i></p> <p><i>(b) justified by a study (prepared in support of the planning proposal) which gives consideration to the objective of this direction, or</i></p> <p><i>(c) in accordance with the relevant Regional Strategy or Sub-Regional Strategy prepared by the Department of Planning which gives consideration to the objective of this direction, or</i></p> <p><i>(d) of minor significance.</i></p> <p>This Planning Proposal does not alter the zoning of the site or change the range of permissible uses. Residential Flat Buildings are permissible in the zone along with commercial premises.</p>	
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2. Environment and Heritage

<p>Direction 2.3 - Heritage Conservation</p>	<p><i>The objective of this direction is:</i></p> <p><i>(1) to conserve items, areas, objects and places of environmental heritage significance and indigenous heritage significance.</i></p> <p><i>A planning proposal must contain provisions that facilitate the conservation of:</i></p> <p><i>(a) items, places, buildings, works, relics, moveable objects or precincts of environmental heritage significance to an area, in relation to the historical, scientific, cultural, social, archaeological, architectural, natural or aesthetic value of the item, area, object or place, identified in a study of the environmental heritage of the area,</i></p> <p><i>(b) Aboriginal objects or Aboriginal places that are protected under the National Parks and Wildlife Act 1974, and</i></p> <p><i>(c) Aboriginal areas, Aboriginal objects, Aboriginal places or landscapes identified by an Aboriginal heritage survey prepared by or on behalf of an Aboriginal Land Council,</i></p>	<p>Yes</p>
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	<p><i>Aboriginal body or public authority and provided to the relevant planning authority, which identifies the area, object, place or landscape as being of heritage significance to Aboriginal culture and people.</i></p> <p>This Planning Proposal seeks to delist 37 Marion Street. 37 Marion Street has an approved consent for demolition. To that end this Proposal is consistent with this Direction.</p> <p>Notwithstanding, as the site is near and adjoins other items, the Direction states:</p> <p>(5) <i>A planning proposal may be inconsistent with the terms of this direction only if the relevant planning authority can satisfy the Director-General of the Department of Planning (or an officer of the Department nominated by the Director-General) that:</i></p> <p>(a) <i>the environmental or indigenous heritage significance of the item, area, object or place is conserved by existing or draft environmental planning instruments, legislation, or regulations that apply to the land, or</i></p> <p>(b) <i>the provisions of the planning proposal that are inconsistent are of minor significance.</i></p> <p>The subject site contains one listed item (37 Marion Street) and is adjoined to the west by two heritage items (29 and 31 Marion Street). The Statement of Heritage Impact (attached) includes a detailed historical overview, an assessment of the internal and external fabric and condition of the items and the contribution and integrity of the listings as heritage items. This planning proposal seeks to delist the heritage item at 37 Marion Street following the development consent granted by the Independent Hearing and Assessment Panel (DA/823/2017) to demolish this item.</p> <p>The study also notes that the proposed development being considered in the vicinity to heritage items is supportable and something that Councils, including Parramatta have previously approved</p>	
<p>3. Housing, Infrastructure and Urban Development</p>		

<p>Direction 3.1 - Residential Zones</p>	<p><i>The objectives of this direction are:</i></p> <p><i>(a) to encourage a variety and choice of housing types to provide for existing and future housing needs,</i></p> <p><i>(b) to make efficient use of existing infrastructure and services and ensure that new housing has appropriate access to infrastructure and services,</i></p> <p><i>(c) to minimise the impact of residential development on the environment and resource lands.</i></p> <p>The Planning Proposal accords with the objectives outlined above, particularly by locating housing near existing CBD infrastructure and transport nodes. The gentrification of existing underutilised CBD land also minimises environmental impacts and uses land resources more efficiently.</p>	<p>Yes</p>
<p>Direction 3.4 - Integrating Land Use and Transport</p>	<p><i>(1) The objective of this direction is to ensure that urban structures, building forms, land use locations, development designs, subdivision and street layouts achieve the following planning objectives:</i></p> <p><i>(a) improving access to housing, jobs and services by walking, cycling and public transport, and</i></p> <p><i>(b) increasing the choice of available transport and reducing dependence on cars, and</i></p> <p><i>(c) reducing travel demand including the number of trips generated by development and the distances travelled, especially by car, and</i></p> <p><i>(d) supporting the efficient and viable operation of public transport services, and</i></p> <p><i>(e) providing for the efficient movement of freight.</i></p> <p>The proposal achieves these objectives by virtue of maximising housing with access to existing transport infrastructure and significant employment lands. It particularly creates new pedestrian transport links enhancing access to Harris Park Station.</p> <p>This demonstrates the project's suitability having regard to this Direction particularly in relation to access to Westconnex and nearby employment land.</p>	<p>Yes</p>
<p>4. Hazard and Risk</p>		
<p>Direction 4.1 - Acid Sulfate Soils</p>	<p>Council's planning maps indicate that the site is affected by acid sulphate soils. The site is noted as Category 5. The planning proposal is consistent with the Direction on Acid Sulphate Soils and the entire</p>	<p>Yes</p>

	suburb is affected. Further studies are not necessary until the DA stage.	
6. Local Plan Making		
Direction 6.1 - Approval and Referral Requirements	None provided. A VPA will comprise part of the Proposal to potentially deal with site-specific matters.	Yes
7. Metropolitan Planning		
Direction 7.1 - Implementation of A Plan for Growing Sydney	Consistent Assessment against A Metropolis of Three Cities was considered in detail under Part 3 Section B of this Planning Proposal.	Yes
Direction 7.3 - Parramatta Road Corridor Urban Transformation Strategy	The proposal is within the “Parramatta CBD precinct of the Greater Parramatta to Olympic Peninsula Urban Renewal area”. Harris Park precinct is located immediately to the north of the western end of the Parramatta Road Corridor Urban Transformation Strategy area and therefore the site is not subject to this Direction.	Yes
Direction 7.5 – Implementation of Greater Parramatta Priority Growth Area Interim Land Use and Infrastructure Implementation Plan	<p>Consistent</p> <p>The Greater Parramatta Interim Land Use and Infrastructure Implementation Plan was released in July 2017. The interim Plan identifies how more jobs, homes and essential services will be accommodated in the priority growth area over the next 20 years. It includes a land use framework to guide future redevelopment of the priority growth area, identifies key actions for the short term and allows the Greater Sydney Commission and other government agencies to identify and plan for the infrastructure required to unlock its potential.</p> <p>In November 2019, the draft GOPP PIC Pilot was released for public comment and feedback by the greater Sydney Commission. The PIC proposed 26 Precincts within GOPP and high-level sequencing for the alignment of growth with the provision of infrastructure. 33-43 Marion Street is within the Parramatta South Precinct which falls under proposed action 1 – to “focus on precincts where growth can be aligned with already committed infrastructure to support job creation and new development”.</p> <p>This precinct was assessed as being a strategic precinct to facilitate development and land use changes aligned with investment in services and infrastructure. It was found to be more cost-effective</p>	Yes

than other precincts in GOP. The Planning Proposal therefore aligns with and is consistent with the PIC.

As can be seen from the Key Actions for Greater Parramatta Priority Growth Area diagram below, the site is within the Parramatta CBD which includes a ‘current review underway’ and to ‘work with City of Parramatta to advance the planning proposal’. This planning proposal aligns with the Parramatta CBD planning proposal including the supporting HAA Report and has been endorsed by Council and received Gateway determination. This proposal has been updated to reflect the conditions of the Gateway, however is ultimately in accordance with the Priority Growth Area vision and objectives and the planning proposal therefore is consistent with this S9.1 Direction.

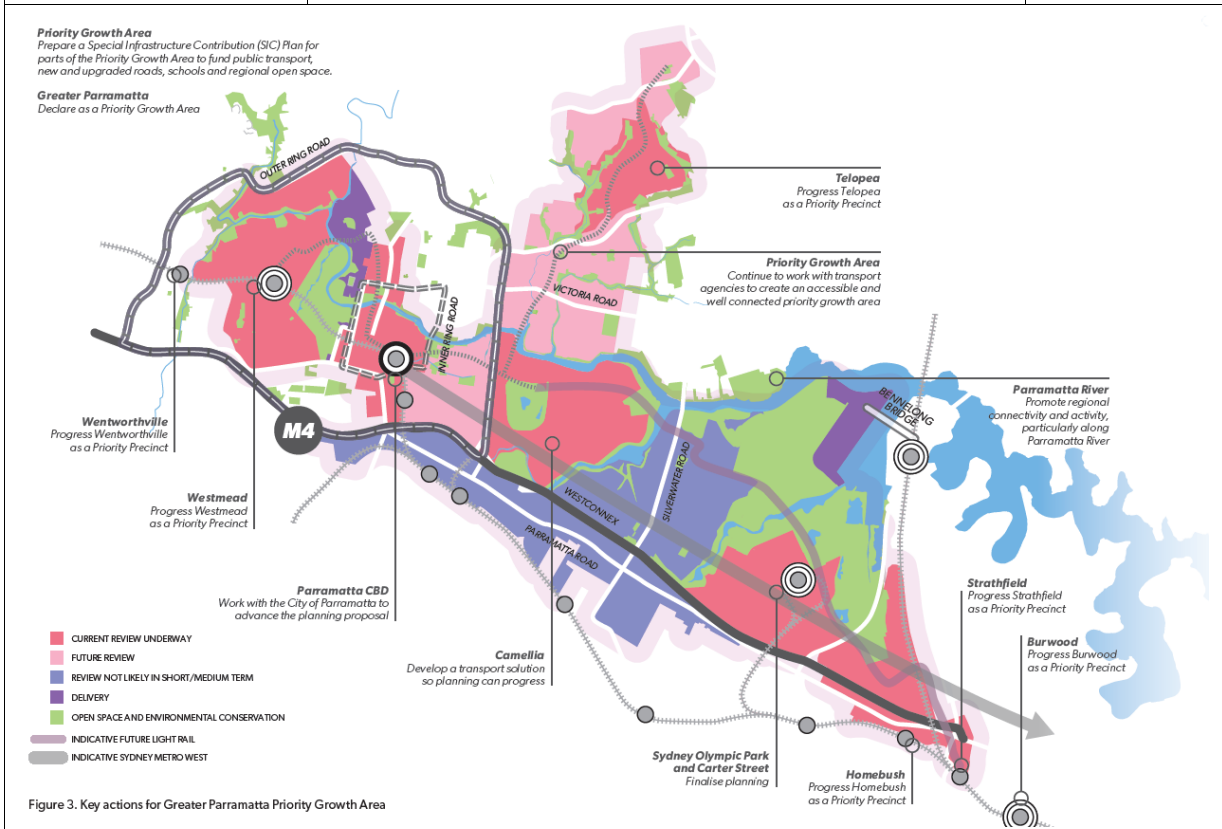


Table 8: Consistency of planning proposal with relevant Section 9.1 Directions

Section C – Environmental, social and economic impact

This section considers the potential environmental, social and economic impacts which may result from the Planning Proposal.

7. 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 site is located within a highly modified urban environment and unlikely to contain critical habitat or threatened species, populations or ecological communities, or their habitats.

8. Are there any other likely environmental effects as a result of the planning proposal and how are they proposed to be managed?

There are no proposed changes to the zone and therefore no significant land-use issues requiring consideration at this stage. The following matters are relevant:

8.1 Heritage:

A formal Statement of Heritage Impact and Heritage Fabric Analysis and Photographic Record has been prepared for this proposal and is appended to this report. Further an additional autonomous heritage assessment of each of the items has been undertaken and is also included. These reports have been prepared in accordance with the NSW Heritage Manual and in particular, guidelines for the preparation of “Statement of Heritage Impact”.

The heritage item at 37 Marion Street has been approved for demolition, per DA/827/2017, with consent granted by the Independent Hearing and Assessment Panel. The planning proposal is accordingly seeking to delist the heritage notation from this site to account for the approved demolition.

SJB Marion Street Precinct Study

Marion Street is located within the South-West Parramatta Interface Area, and condition (k)(i) of the CBD Planning Proposal Gateway determination is relevant as follows:

“carry out further investigations of heritage interface areas and clearly identify where there are inconsistencies between the intended outcomes in the planning proposal and the heritage reports that have been prepared. Council is to provide further information to identify where the inconsistencies exist, the extent of the inconsistencies and how they are proposed to be addressed”.

To address the above condition, Council commissioned SJB Urban Design and Planning to prepare an urban design, planning and heritage study for the Marion Street Precinct. The Study did not test the validity of the heritage listings and noted that not all have thorough statements of significance or detailed physical assessments. Detailed fabric analysis would require access to the properties which was not available.

Notwithstanding, the proposed initiatives to inform future development include, but aren't limited to:

- *Retain the existing listed heritage items: however, do not schedule the Marion Street Precinct as a heritage conservation area,*
- *Focus density and height at each end of the heritage core, to harmonise with the scale of development proposed within the Auto Alley Precinct and to frame the view corridor from Marion Street east,*
- *Deliver a through-site link between Marion Street and Peace Lane to improve north-south connectivity,*
- *Reinforce the street edge with podium developments,*
- *Maximise setback between new building and heritage buildings to minimise impacts on the heritage items and streetscape character,*
- *Preserve solar access to Marion Street and heritage items,*
- *Footpath widening along both sides of Marion Street (east of Cowper Street) with increased boundary setback (up to 3 metres) to facilitate landscaping and pedestrian movement.*

As it relates to 33-43 Marion Street, the Study recommends:

“An incentive FSR of 6:1 for sites at the eastern of Marion Street”

In adopting the Study’s recommendations and core urban design principles, the CBD Planning Proposal also provides for a maximum height of 80 metres at the eastern end of Marion Street.

The Planning Proposal for 33-43 Marion Street achieves a number of the core urban design principles, including the through site link between Marion Street and Peace Lane, the setback to the adjoining heritage, and maximising pedestrian space and human movements. The development outcome rationale slightly differs, in that a tall slender tower has less of an overshadowing impact on existing and future properties to the south, provides for more open space and permeability around the development and creates a less intimidating interface with Marion Street.

8.2 Traffic:

The Traffic and Transport report (Appendix 4) details the strategic significance of the site in terms of access to transport infrastructure. This includes rail, bus, road, pedestrian and cycleway services. This analysis details the strategic merit of the site in terms of appropriateness for higher density living at this location.

In terms of local impacts the report notes that it is quite modest and manageable. The following comments summarise the findings of the report and that the Planning Proposal is supportable in terms of traffic:

Development traffic will access Peace Lane which is of sufficient width to cater for the increased traffic as a result of the subject development. It is noted that Peace Lane is one-way (westbound) with No Stopping restrictions applying in proximity to its intersections to facilitate turning movements.

The proposed increase in FSR will result in an increase of 17 and 13 vehicles per hour during the weekday morning and evening peak periods, respectively.

Furthermore, it can be seen from Section 7.2 that the relative increase in traffic at key intersections on the periphery of the study area will be a maximum of 6 veh/hr for any one movement. This equates to a single additional vehicle every 10 minutes which will have negligible impact on the performance of the surrounding road network

Note: above quotes are based on a potential density on the site of up to 10:1, greater than that sought by the Planning Proposal.

There are no emerging traffic matters that would preclude this planning proposal. More detailed matters can be considered at the Development Application stage.

8.3 Site Capability:

The UDR models a building form based on a density which is appropriate in terms of its hierarchy to other similar centres and the heights and densities within the Parramatta CBD (Section 3 – Planning Framework).

The interrogation in the UDR is thorough and also incorporates general DCP principles into the building design concept.

8.4 Overshadowing:

The site is located within a CBD context where tall buildings cast shadows. The Planning Proposal seeks a maximum FSR of 6:1, excluding design excellence incentives and building performance bonuses. The proposal also seeks a maximum height of 80 metres (92 metres with design excellence) which will be subject to further detailed design. It is acknowledged that this planning proposal will result in additional overshadowing. However, given its context within the Parramatta CBD, this is considered acceptable.

Further assessment against the ADG solar access requirements for itself and nearby buildings will be undertaken at Development Assessment stage.

9. How has the planning proposal adequately addressed any social and economic effects?

This Planning Proposal will not have any significant economic consequences as no change is proposed to the zoning of the site or uses permissible in that zone. This focusses the examination on the impacts of additional density on the site, as distinct from any new uses.

This proposal supports the overall vision to see Parramatta CBD thrive and grow as a vital centre. This Planning Proposal does not oppose any of these objectives and will impact positively in this regard. In detailed terms this Planning Proposal has the potential to provide assistance with public projects around the CBD and should also result in the ability to provide streetscape works in the vicinity.

Vibrant CBDs have people living in them. This Planning Proposal is a tremendous way of stimulating local businesses, encouraging passive surveillance after business hours and creating places which attract tourists. The street level is to be activated with retail spaces (retail/cafes/bars) which will serve new and existing residents. The building layout on the site encourages pedestrian activity through the site which will also stimulate retail activation and increase the permeability of the site to and from the train station. It will also create passive surveillance in the immediate area around Marion Street and towards the railway station which is a significant social benefit. Further commercial and/or community infrastructure space is intended to be provided above ground.

The additional housing will generate some demand for community and educational services. Parramatta is well placed to monitor such demand as the city grows into its role as a second CBD. Demand for schools is monitored by the State Government.

A formal Economic Report has been prepared to examine the site and the proposed building outcome in its context. This report analyses:

- the expected cost and sales of the building, required as the key input into the economic effect of construction;
- the economic and employment benefits (direct and indirect) to the Parramatta economy of building the development;
- the economic and employment benefits (direct and indirect) to the Parramatta economy of the active retail/commercial space; and
- State tax and local government rates revenue as a result of the development.

The report concludes:

The proposed development at 33-43 Marion Street, Harris Park, brings considerable economic benefits.

Depending on the scenario modelled, the building is estimated to create between 183 and 262 full-time equivalent jobs in the Parramatta local government area during the construction phase. In addition, the active frontage retail/commercial aspect will create 23 FTE jobs in the first year of operation, rising to 55 in 10 years.

The development is projected to raise significant taxes for state and local government. It is estimated that over \$7.2 million would be generated in stamp duty, as well as over \$347,000 per year in land tax and over \$160,000 per year in rates.

In addition to the public and private benefits outlined in this report, the proposed development will increase housing supply in the Harris Park area, is close to public transport, and increases the amenity of the local area.

Note: the final economic benefit will be dependent on the final density achieved. The Economic Report considers a number of scenarios which will be refined as the process progresses and the development scenario occurs.

In specific terms the total benefit to the Parramatta economy of the proposal is \$22.49M per annum. The detailed examination of this direct and flow-on spend is outlined in Appendix 1 of the Economic Report.

The overall proposal will have a positive economic impact in the terms quantified in the report. In social terms the benefit will also be positive with enhanced surveillance, retail services, site access and increase in the provision of community services as a result of the additional population.

Public Benefit:

The Planning Proposal is also accompanied with a draft Planning Agreement which seeks to provide Council with a monetary contribution towards community infrastructure in the Parramatta CBD and to ensure adequate footpath widening and through-site links on and around the site.

Section D – State and Commonwealth Interests

10. Is there adequate public infrastructure for the planning proposal?

Yes. The planning proposal prepared for the overall CBD notes that the review of density controls is expected to result in additional demand for existing public infrastructure as follows:

- Utilities, waste management and recycling services
- Public transport and roads
- Essential Services
- Community Infrastructure
- Aeronautical operations

The broader review of densities within the CBD will include a review of all essential services and augmentation requirements. It is relevant that this density is contained in the same footprint and adjacent to transport infrastructure. This is minor within the CBD context and essential services are available to the site.

Council are engaged with State Agencies in relation to the Infrastructure Delivery Plan and Infrastructure Models Funding Study as part of the overall CBD review, and consultation will occur with State Agencies and local service providers during the Plan Making process after a Gateway determination has been issued.

11. What are the views of State and Commonwealth public authorities consulted in accordance with the gateway determination?

The planning proposal received a Gateway determination on 23 July 2018 from the Department of Planning and Environment as delegate of the Greater Sydney Commission. The Gateway stated:

(4) *Consultation is required with the following public authorities under section 3.34(2)(d) of the Act:*

- *Office of Environment and Heritage*
- *Transport for NSW; and*
- *Roads and Maritime Services*

Therefore, consultation will occur with the state authorities in accordance with the Gateway.

PART 4 – MAPPING

This section contains the proposed mapping for this planning proposal in accordance with the DPI&E’s guidelines on LEPs and Planning Proposals.

The figures in this section illustrate the proposed land use zoning, building height and floor space ratio controls sought by this planning proposal.

Proposed Floor Space Ratio – 6:1 “AA1”

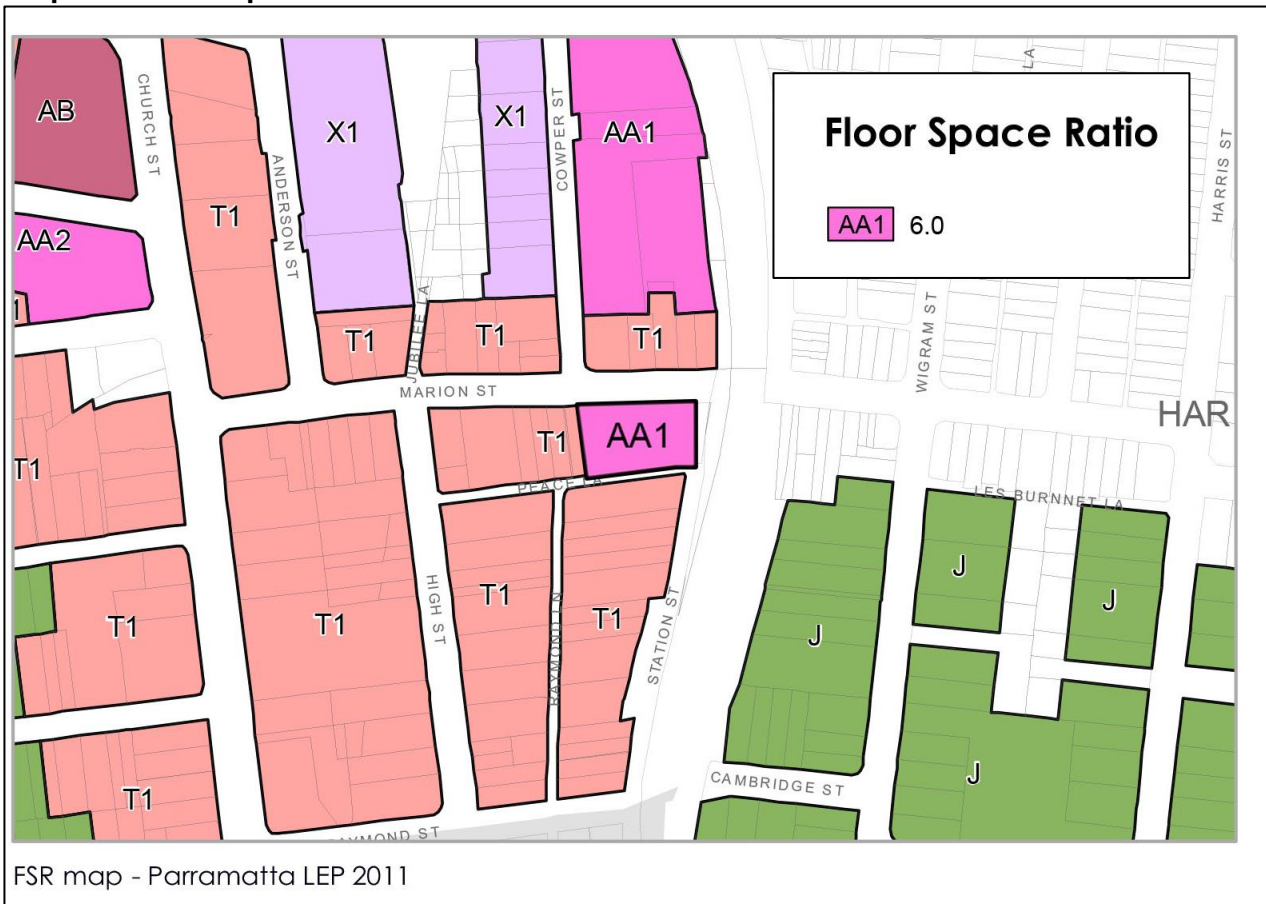


Figure 13: Proposed Maximum FSR

Proposed Maximum Height of Buildings – 80 metres

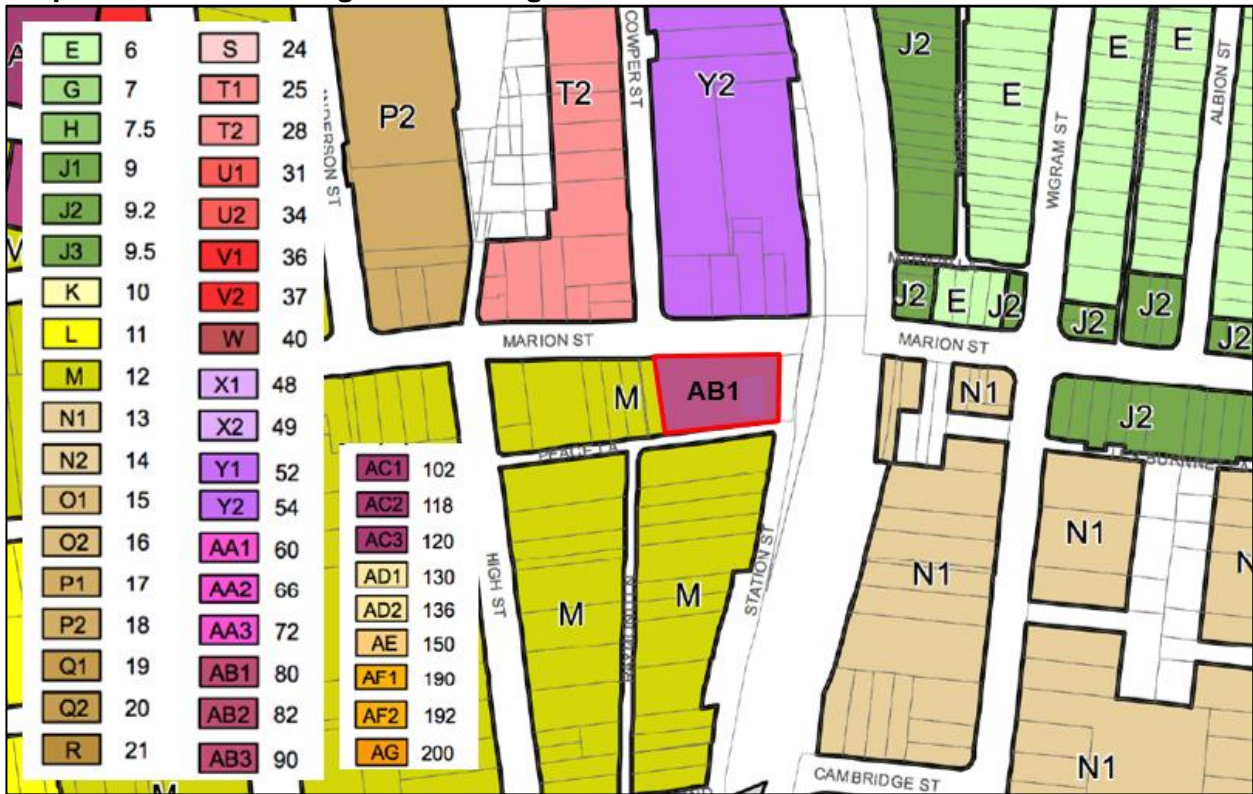


Figure 14: Proposed Maximum Height of Buildings



Figure 15: Proposed Heritage Map

PART 5 – COMMUNITY CONSULTATION

A Gateway determination was issued by the delegate of the Greater Sydney Commission on 23 July 2018 under Section 3.34(1) of the EP&A Act 1979. As it relates to community consultation, the determination requires:

- (3) *Public exhibition is required under Section 3.34(2) and Schedule 1 Clause 4 of the Act as follows:*
 - (a) *the planning proposal must be made publicly available for a minimum of **28 days**; and*
 - (b) *the planning proposal authority must comply with the notice requirements for public exhibition of planning proposals and the specifications for material that must be made publicly available along with planning proposals as identified in Section 5.5.2 of A guide to preparing local environmental plans (Department of Planning and Environment 2016)*

On 27 May 2019 the Gateway determined that the planning proposal could proceed subject to certain requirements. These requirements have been addressed through this proposal. Therefore, community consultation will be undertaken in accordance with the above condition and is likely to include a notice in the local newspaper and on Council's web site as well as written notice to land owners in the vicinity of the site and key stakeholders.

PART 6 – PROJECT TIMELINE

Table 7 below illustrates the timeline proposed for the progression of the Planning Proposal:

Key Milestone	Timeframe:	Milestone
Planning Proposal submitted to City of Parramatta Council	May 2017	Complete
Assessment and consideration by City of Parramatta Council	May-December 2017	Complete
Update on Planning Proposal considered by Council	December 2017	Complete
Council to formally endorse Planning Proposal for progression to Gateway	February 2018	Complete
Planning Proposal submitted to Department of Planning and Environment for consideration and assessment	February 2018	Complete
Gateway Determination issued – 23 July 2018	July 2018	Complete
Amendments and additional heritage analysis to be undertaken as per Condition 1 of the Gateway determination	July – October 2018	Complete
Planning Proposal and supporting documentation submitted to Department of Planning and Environment seeking approval to exhibit	October – November 2018	Complete
Approval from Department of Planning and Environment to exhibit pending amendments to the Planning Proposal	May 2019	Complete
Public Exhibition and Government Agency consultation	April 2020- May 2020	
Consideration of submissions and reporting to Council	August 2020	
Submission to Department to finalise the LEP	September 2020	
Legal drafting of LEP	October 2020	
Making of the Plan (Council as delegate for the Minister)	November 2020	

Table 9: Proposed Project Timeline



Prepared by City of Parramatta

PARRAMATTA WE'RE BUILDING **AUSTRALIA'S NEXT GREAT CITY**