



**CITY OF  
PARRAMATTA**

# **Overshadowing in the Parramatta CBD**

Technical Paper

Revised 12 August 2020

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# 1. Executive Summary

The Parramatta CBD is anticipated to experience significant growth as part of the review into planning controls within the CBD. Controls within the Draft CBD Planning Proposal – endorsed in April 2016 – has the potential to deliver nearly 50,000 additional jobs and about 20,000 additional dwellings.

The Gateway Determination issued by the Department of Planning and Environment in December 2018 included a series of conditions that required additional work to be undertaken prior to publicly exhibiting the Draft Planning Proposal. Four of these conditions relate to assessing the potential impacts of overshadowing from proposed controls and the protection of sunlight access to key public areas within and around the CBD. In summary, the conditions require:

- an analysis of the potential overshadowing of Experiment Farm which may result from the planning controls (refer to Section 4 of this paper);
- an analysis to inform a sun access protection surface (sun access plane) for the protected area of Parramatta Square between 12-noon and 2:00pm, including consideration of the times of year the proposed controls would apply (refer to Section 5 of this paper);
- an assessment of the cumulative overshadowing from the southern areas of the CBD across nominated Heritage Conservation Areas (HCAs) – namely, Harris Park West, Experiment Farm, Tottenham Road, and South Parramatta (refer to Section 6 of this paper); and
- a comparison of the overshadowing from both the existing and the proposed controls on public open spaces surrounding the CBD (refer to Section 7 of this paper).

Further testing and refinements were made to the model following deferral of this matter from the Council meeting of 24 June. This is discussed in Sections 4 and 8 of this paper and has informed the updated base and incentive height of building maps accompanying the planning proposal.

This technical paper sets out the terms of the conditions issued by the Department; the method used to undertake the analysis and the findings of the technical analysis to address the conditions.



*Figure 1 - Parramatta CBD viewed from Experiment Farm Reserve. 11 Hassall Street, Parramatta, is the tall apartment tower in the middle of the photo*

## 2. The Conditions

The Gateway Determination issued on 13 December 2018 by the Department of Planning and Environment sets out four conditions pertaining to analysing potential overshadowing under the CBD Planning Proposal. These are:

- Condition 1(j)(ii) — *Provide further assessment of the overshadowing impact of the proposed controls on public open spaces surrounding the CBD compared to the existing controls;*
- Condition 1(j)(iii) — *Incorporate an assessment of the potential overshadowing impacts on Experiment Farm that may result from the proposed planning controls (outside the proposed sun access plane of 10am–2pm);*
- Condition 1(j)(iv) — *Provide further analysis to inform a sun access plane for the protected area of Parramatta Square between 12pm and 2pm, including the times of the year that the proposed controls would apply; and*
- Condition 1(k)(ii) — *Carry out an urban design study of the southern interface areas to ensure that excessive cumulative shadow impacts are not created across the northern sections of adjoining heritage conservation areas (HCAs), including the Harris Park [West] HCA, the Experiment Farm HCA, the Tottenham Street HCA and the South Parramatta HCA. These areas should receive a minimum of two hours' direct sunlight between 9am and 3pm at midwinter (21 June). If required, heights and FSRs are to be adjusted accordingly.*

The Gateway Determination was altered on 27 July 2020 with a further condition pertaining to overshadowing:

- Condition 1(o) — *Ensure protection of compensatory area of solar access at the eastern end of Parramatta Square at the Spring and Autumn equinox.*

Each of these conditions have been analysed using Council's Geographic Information System (GIS) application. Several assumptions have been applied for the purpose of this analysis and these are discussed in Section 3 of this Paper.



Figure 2 - Overshadowing cast by existing development in the Parramatta CBD. Photo taken from Level 33 at 11 Hassall Street, Parramatta, on 8 October 2018 at 6:15pm (UTC+11).

# 3. The Assumptions and Setting up the Model

To reliably identify and assess the impacts of potential overshadowing, the GIS model needs to apply some basic assumptions. These are set out and discussed below.

## 3.1. Establishing and Representing the terrain

Developing and applying a Digital Elevation Model (DEM) to represent approximately the ground level (existing) across the CBD is necessary, as the Parramatta CBD is not flat. Ground level (existing) ranges from about 4m at the Parramatta River to about 40m along the Great Western Highway ridgeline. This DEM represents the terrain, upon which the 3D models and extruded representations of the planning controls will be placed when they are measured from ground level (existing). It is also used to inform the ground level from which the Sun Access Protection surfaces will be generated.

The DEM for the purposes of this analysis adopts a horizontal resolution of 5m x 5m — each “pixel” of the grid is 25sqm in area. Vertical resolution is 1mm. This means that the ground representation is precise enough for modelling at a block or precinct scale. Figure 3 shows the DEM output for the southern half of the Parramatta CBD with a map scale of 1:8,000 @ A4. Figure 4 shows a magnified DEM output at the Church Street railway bridge with a map scale of 1:1,000 @ A4. In Figure 4, the individual “pixels” for each 5m x 5m grid can be clearly seen.

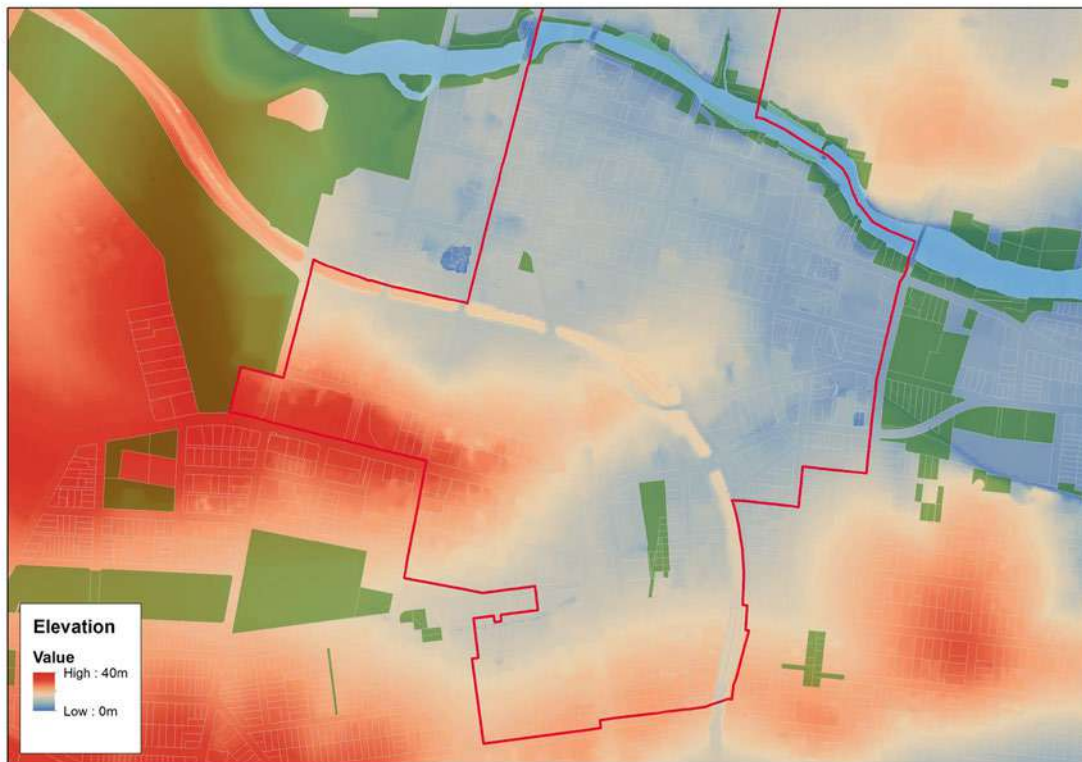


Figure 3 - Digital Elevation Model. Map Scale 1:8,000 @ A4 (scaled to 50% in this document)



Figure 4 - Digital Elevation Model at the Church Street railway overbridge abutment. Note the clear definition of individual 5x5m "pixels". Map Scale 1:1,000 @ A4 (scaled to 50% in this document)

Note: Ground level (existing) has the same meaning as set out in Parramatta Local Environmental Plan 2011 – and means "the existing level of a site at any point".

### 3.2. Applying maximum heights to planning controls

Height of Buildings controls for the Parramatta CBD Planning Proposal, and the current Parramatta LEP 2011, are measured in one of two ways:

- The height is measured vertically from ground level (existing) — i.e. the terrain — and will shift vertically in absolute terms because of changes to the terrain; or
- The height is measured vertically from sea level (0m AHD), and does not respond to changes in the terrain. Heights in this case are expressed as Reduced Levels (RLs). RLs are an absolute value, irrespective of the terrain (see Box 1).

#### Box 1: Expressing and measuring heights as Reduced Levels (RLs)

*Reduced Level (RL) is defined in Parramatta Local Environmental Plan 2011 as meaning "height above the Australian Height Datum, being the datum surface approximating mean sea level that was adopted by the National Mapping Council of Australia in May 1971". This definition is the same for any Local Environmental Plan under the "Standard Instrument—Principal Local Environmental Plan"*

Consequently, it will have different measurements from ground level (existing) depending on where the measurement is taken in the CBD. At Parramatta Square, the equivalent height to a 243m (RL) measurement may be 232m above ground (existing) as the terrain at Parramatta Square is about 11m (RL). On the Great Western Highway ridgeline, the equivalent height may be between 200m and 210m above ground level (existing) as the terrain along the ridge is between 30 and 40m (RL).

Land that is proposed to have an Incentive Height of Buildings control applied is measured from ground level (existing). This includes land along Auto Alley; Church Street between Macquarie Street and the Parramatta River; land surrounding significant heritage items such as St Johns Church and cemetery; or land on the edge of the Parramatta CBD within or near heritage conservation areas (HCAs), such as Parramatta North HCA, Sorrell Street HCA, Harris Park West HCA and Experiment Farm HCA.

The CBD Planning Proposal has sizeable areas where an Incentive Height of Buildings control is not applied. Draft provisions prepared for the Planning Proposal refers to airspace operations within Parramatta Local Environmental Plan 2011 where a development cannot intrude into prescribed airspace without the requisite approvals under the *Airports Act 1996* of the Commonwealth. Presently the airspace operations control applies only to nominated sites; but it is to be expanded to apply to the entire Parramatta CBD under the CBD Planning Proposal. This provision effectively caps heights to levels set out in the Radar Terrain Clearance Chart (RTCC) for Sydney Airport – declared 20 March 2015; or the Procedures for Air Navigation Services – Aircraft Operations (PANS-OPS) for Sydney Airport or Bankstown Airport, whichever is lower. Under these declared airspaces, any permanent or temporary structures (including cranes) must not penetrate the prescribed surfaces.

Additionally, Condition 1(j)(i) of the Gateway Determination requires Council to liaise with the Civil Aviation Safety Authority (CASA) and the federal Department of Infrastructure, Regional Development and Cities to either determine the maximum mapped height of building that can be applied in the Parramatta CBD or provide further justification for the removal of height controls on unconstrained land.

Consequently, for the purposes of modelling overshadowing under the proposed controls for the Parramatta CBD Planning Proposal, limits on building heights have been applied to land where no maximum Incentive Height of Buildings control is mapped. An explanation of the various heights and the rationale behind their application is set out in Table 1.

To model the impacts of overshadowing to meet the conditions of the Gateway Determination, heights of buildings are applied using these assumptions across all sites within the CBD. Figure 5 illustrates the current Height of Buildings control within Parramatta LEP 2011. Figure 6 illustrates the proposed Incentive Height of Buildings control for the Parramatta CBD Planning Proposal. These controls are used to test the comparison of overshadowing impacts for Conditions 1(j)(ii) and 1(k)(ii).



| Maximum Height   | Conditions  | Remarks   |
|------------------|---|---|
| <b>243m (RL)</b> | Applied to land proposed to have an Incentive Floor Space Ratio of 10:1 and is located to the north of the Great Western Highway / Parkes Street, Parramatta. | <p>Measured from sea level (0m AHD) and applies irrespective of the level of the terrain.</p> <p>Based on the Radar Terrain Clearance Chart (RTCC) prescribed airspace for Sydney Airport – declared 20 March 2015.</p>   |
| <b>213m (RL)</b> | Applied to land proposed to have an Incentive Floor Space Ratio of 10:1 and is located to the south of the Great Western Highway / Parkes Street, Parramatta. | <p>Measured from sea level (0m AHD) and applies irrespective of the level of the terrain.</p> <p>Based on the Radar Terrain Clearance Chart (RTCC) prescribed airspace for Sydney Airport – declared 20 March 2015.</p>   |
| <b>92m</b>       | Applied to land proposed to have an Incentive Floor Space Ratio of 6:1  | <p>Measured from ground level (existing) and follows changes in the terrain.</p> <p>Based on internal urban design advice pertaining to a building height achievable for the density. This height includes the 15% Design Excellence bonus currently adopted. It does not include the 5% bonus for High Performing Buildings (HPB) as the HPB bonus only awards additional floor space ratio, not height.</p> |

Table 1 - Explanation of height controls applied to land without an Incentive Height of Buildings control

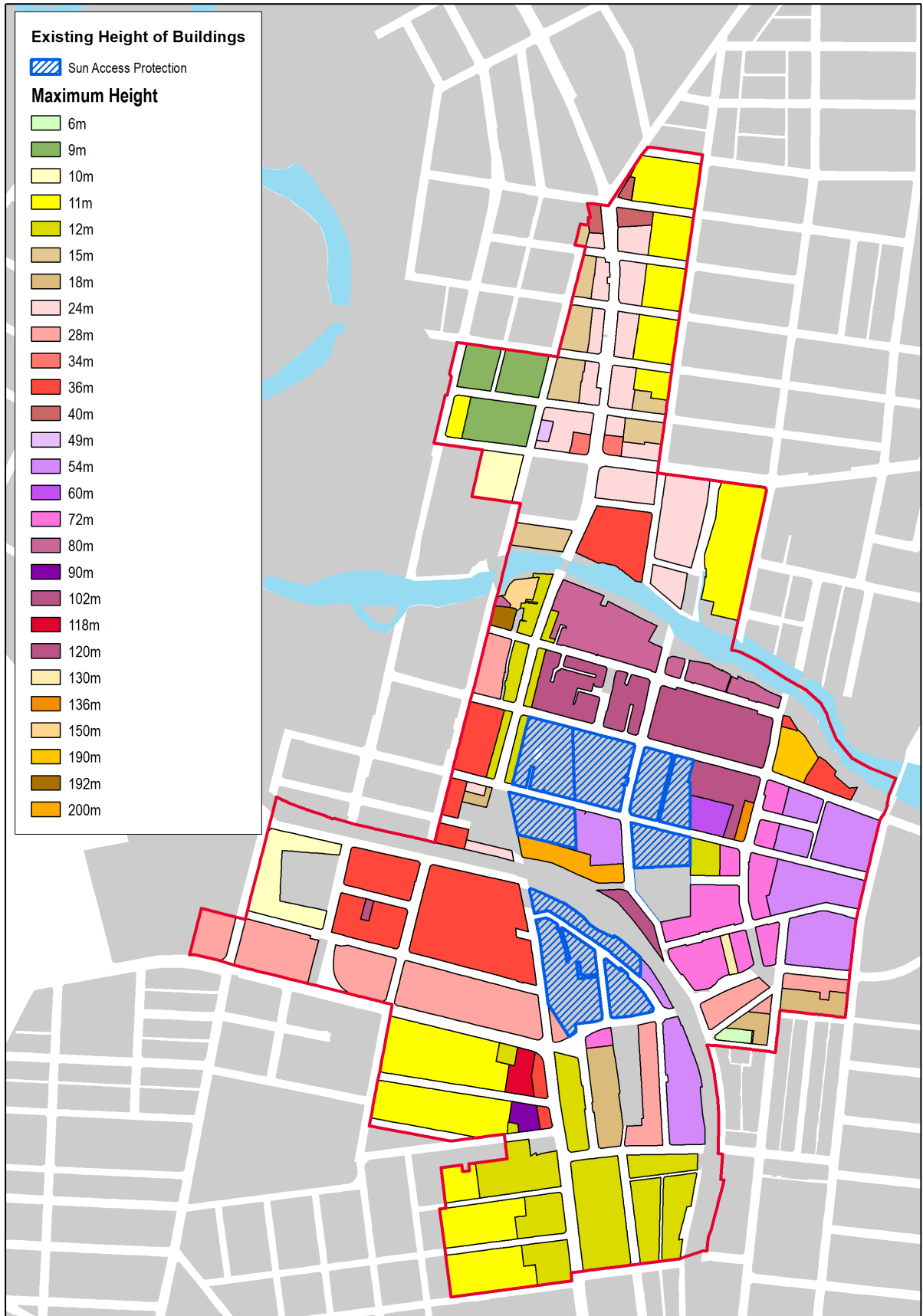


Figure 5 - Existing Height of Buildings control in Parramatta LEP 2011

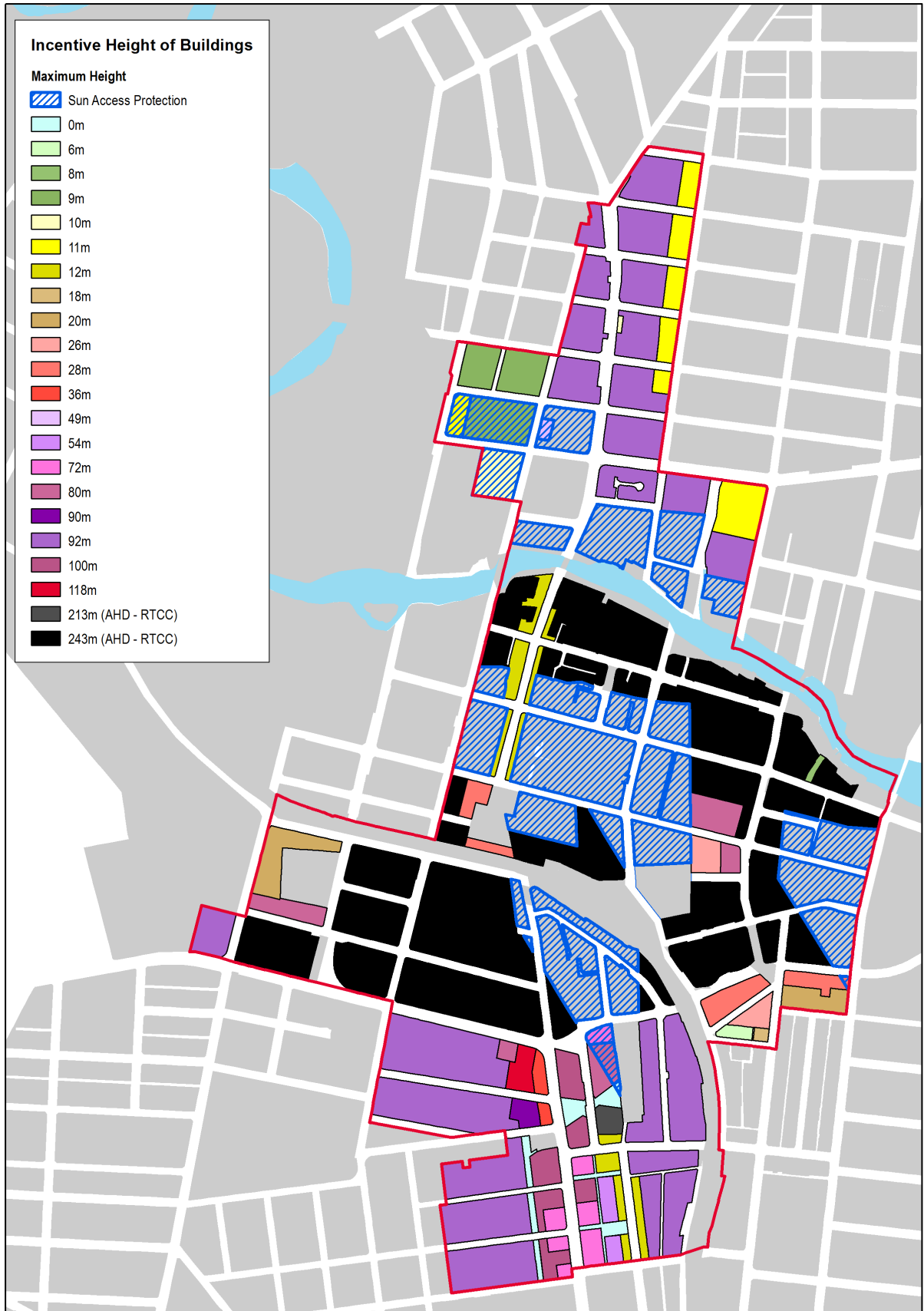


Figure 6 - Proposed Incentive Height of Buildings control under the Parramatta CBD Planning Proposal

### 3.3. Modelling planning controls

Current and proposed planning controls are extruded as three-dimensional polygons across the full extent of the planning control. This ensures that the coverage of any shadow extent potentially created as the result of an existing or proposed planning control will be modelled in full. It also ensures that Council is complying with the terms of the Gateway conditions, which explicitly refers to assessing the impacts of height controls for overshadowing. Extruding planning controls for the purposes of this modelling also assumes that a future building may be located anywhere within the extent of the planning control. Detailed considerations such as individual building design, articulation and architectural form as well as separation between buildings will likely modify the extent of any overshadowing.

Figure 7 shows the extruded form of the proposed Incentive Height of Buildings controls under the Parramatta CBD Planning Proposal. Height controls have been applied to land which, presently, does not have a maximum Incentive Height of Buildings control for the purposes of enabling overshadowing modelling to occur. These assumptions are discussed in Section 3.2.

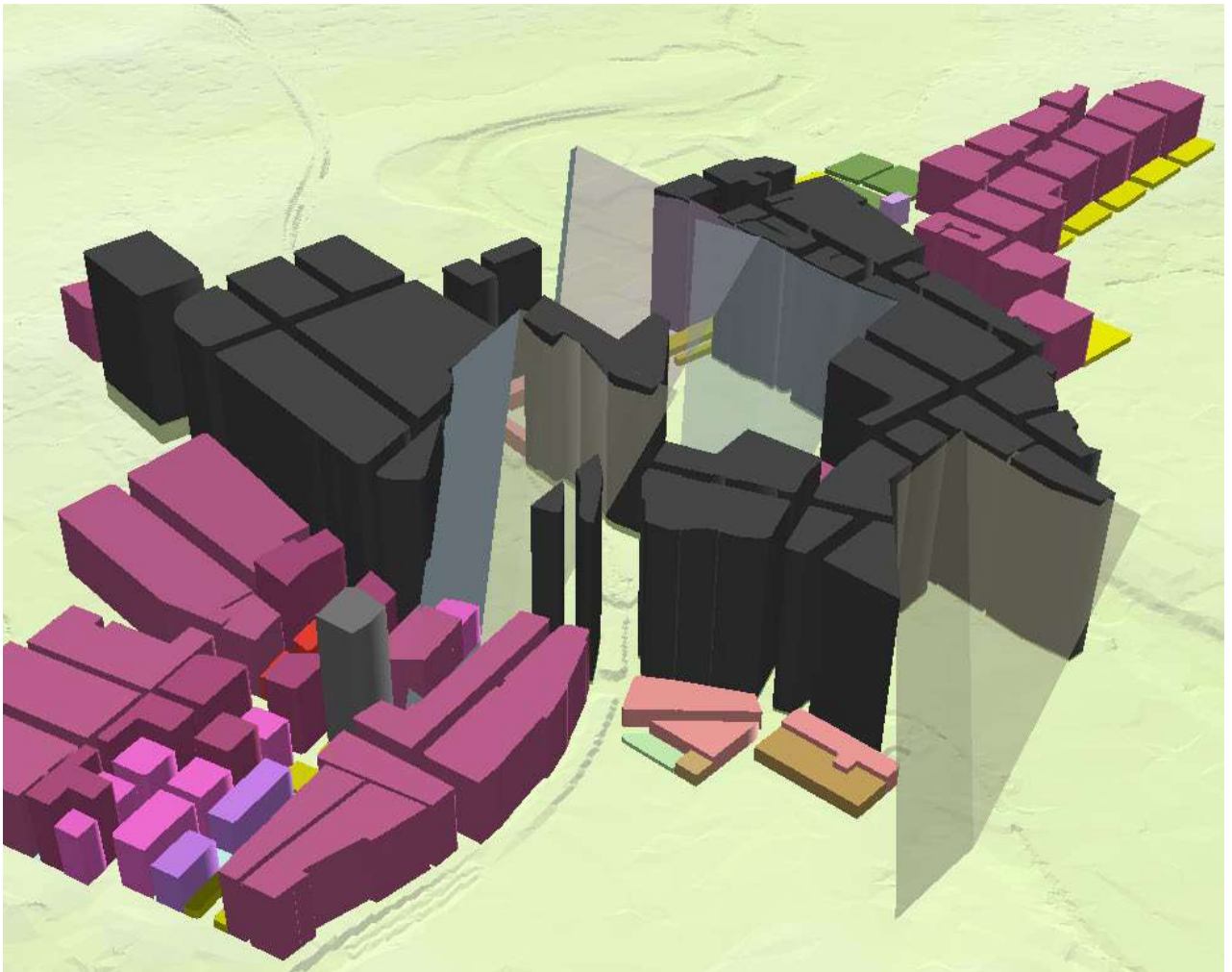


Figure 7 - Extruded representation of the Incentive Height of Buildings Control as 3D polygons. Grey and black polygons are measured as an RL from 0m AHD; other polygons measured from the terrain. Sun Access Protection surfaces included for illustration only.

### 3.4. Applying the period of the year and time of the day

The modelling adopts dates for the purposes of determining overshadowing throughout the year as set out in Table 2.

| Period   | Date         |
|--|--------------|
| Mid-summer   | 21 December  |
| Autumn equinox                                     | 21 March     |
| Nominated date to avoid daylight saving in Autumn* | 14 April     |
| Mid-winter   | 21 June      |
| Nominated date to avoid daylight saving in Spring* | 31 August    |
| Spring equinox                                     | 23 September |

\* Nominated dates are consistent with those used by the City of Sydney for the No Additional Overshadowing control, as per Clause 6.19 of *Sydney Local Environmental Plan 2012*.

Table 2 - Selected dates for overshadowing modelling

While most analysis would be applied on 21 June (mid-winter), the assessment needed for Parramatta Square under condition 1(j)(iv) requests analysis using dates outside just mid-winter – for example, autumn to spring equinox; or nominated dates consistent with the City of Sydney's No Additional Overshadowing control; or year-round.

The period of the day being assessed in the modelling also varies depending on the objective to be addressed in the Gateway Determination condition. These are set out in Table 3 and adopt 30-minute intervals across the nominated times. A reference to "UTC" means a reference to Co-ordinated Universal Time and is a time standard adopted globally. NSW Standard Time and NSW Summer Time are time zones under the *Standard Time Act 1987* where NSW Standard Time is 10 hours ahead of Co-ordinated Universal Time (i.e. UTC+10) and NSW Summer Time is one hour ahead of NSW Standard Time (i.e. UTC+11).

| Assessment  | Time period                  |
|---|------------------------------|
| Impacts on public open space areas surrounding the CBD (condition 1(j)(ii))   | 9am to 3pm                   |
| Impacts on Experiment Farm and curtilage (condition 1(j)(iii))  | 10am to 4.30pm (near sunset) |
| Impacts on Parramatta Square protected area (condition 1(j)(iv))  | 12-noon to 2pm*              |
| Impacts on nominated heritage conservation areas surrounding the CBD (condition 1(k)(ii))   | 9am to 3pm                   |
| * Depending on the extent of the year being assessed, this period will cover both NSW Standard Time (UTC+10) or NSW Summer Time (UTC+11). |                              |

Table 3 - Selected times of the day for overshadowing modelling

### 3.5. Constructing the shadows

Constructing the shadows uses the Sun Shadow Volume geoprocessing tool within Council’s GIS applications (ArcMap and ArcScene). This geoprocessing tool calculates the extent of any shadows using the angle of inclination to the sun (the altitude) and the direction or bearing to the sun (the azimuth) for the selected times of the day and days of the year.

The length of the shadow depends on the time of day and the day of the year. In simple terms, the higher the sun is in the sky, the shorter the shadow cast by an object will be. Figure 8 compares two times of the same day – 9am and 12-noon – and how the shadow is theoretically constructed. Figure 9 compares the same time of day – 12-noon – on different days of the year (i.e. mid-summer versus mid-winter).

Figure 10 illustrates how the angle of inclination to the sun changes between 9am and 3pm on key dates of the year – mid-summer, mid-winter, and the autumn and spring equinoxes. This figure shows that the angle to the sun is highest between 12-noon and 1pm. The figure also shows that the highest angle of the sun on mid-winter (21 June) is lower than at any time between 9am and 3pm on the spring equinox (23 September) or mid-summer (21 December). For this reason, mid-winter is usually adopted to test the greatest extent of overshadowing from development as the shadows will be the longest.

Figure 11, Figure 12 and Figure 13 illustrate examples of the Sun Shadow Volume output for the Incentive Height of Buildings controls under the Parramatta CBD Planning Proposal at 9am, 12-noon and 3pm respectively on 21 June 2018.

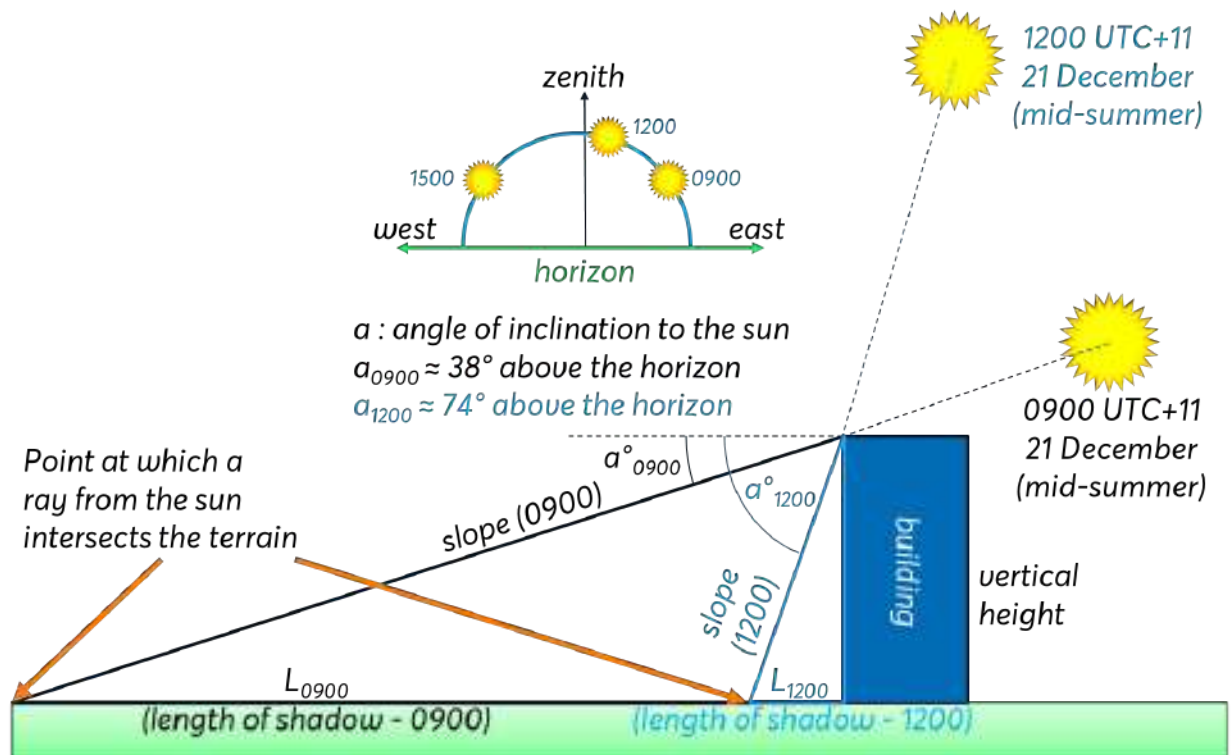


Figure 8 - Sun shadow comparison between 9am and 12-noon on 21 December (mid-summer)

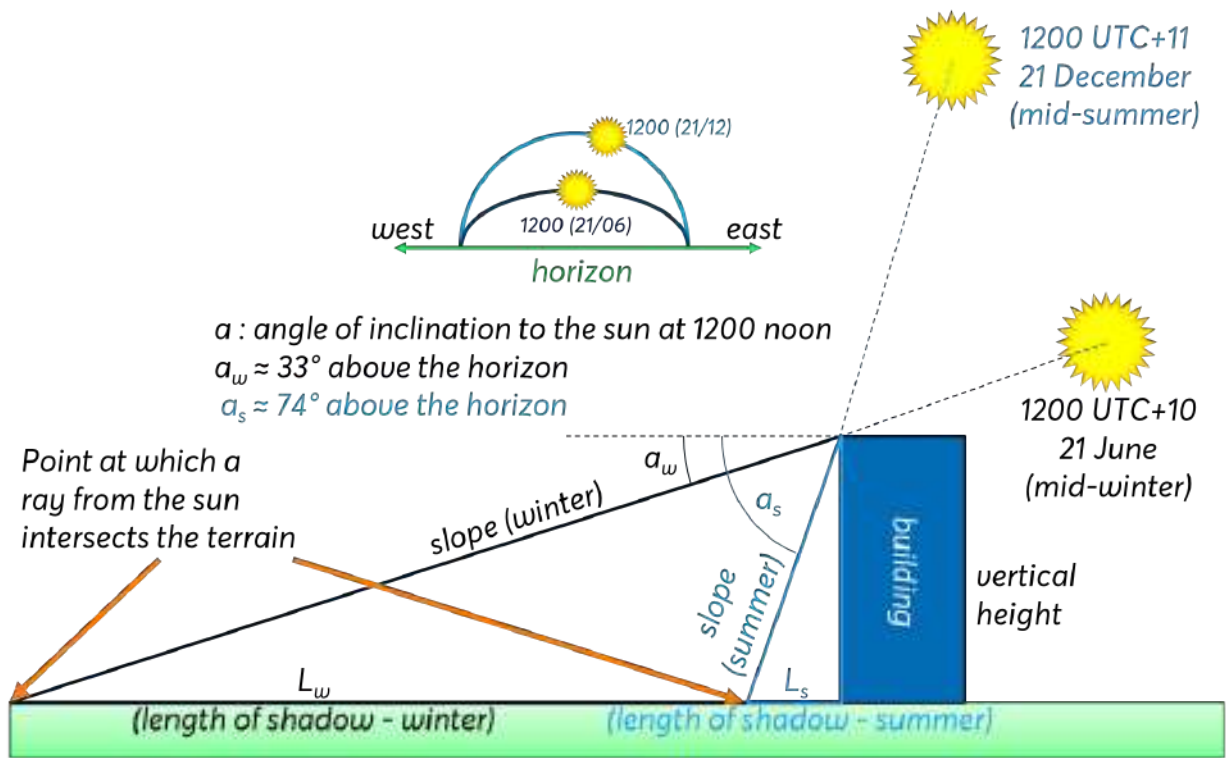


Figure 9 - Sun shadow comparison at 12-noon on 21 December (mid-summer) and 21 June (mid-winter)

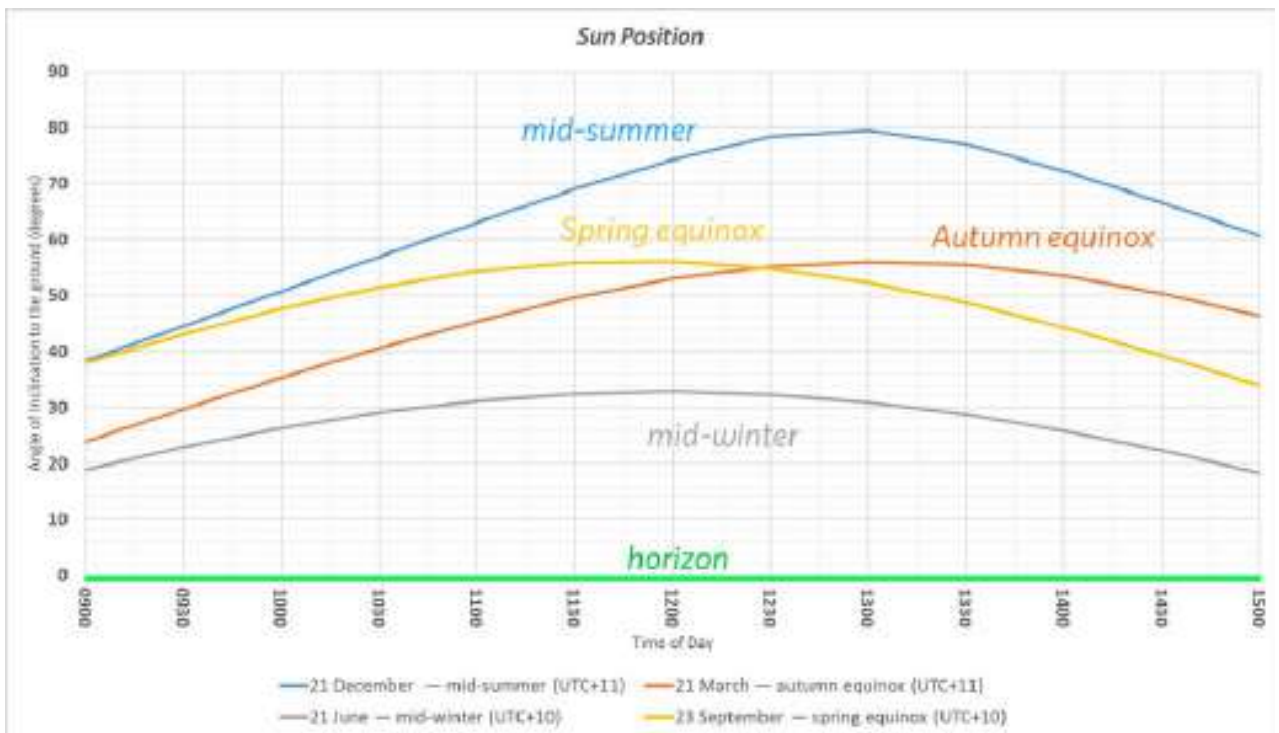


Figure 10 - Sun's angle of inclination to the ground between 9am and 3pm

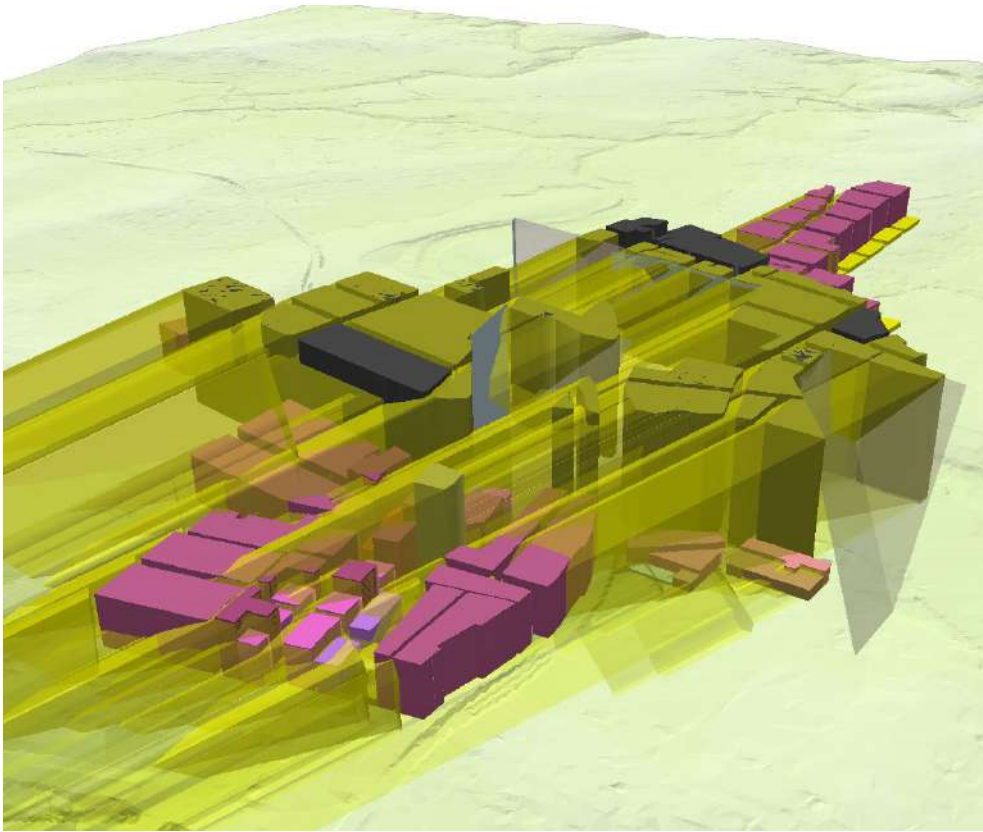


Figure 11 - Sun Shadow Volume output at 9am on 21 June

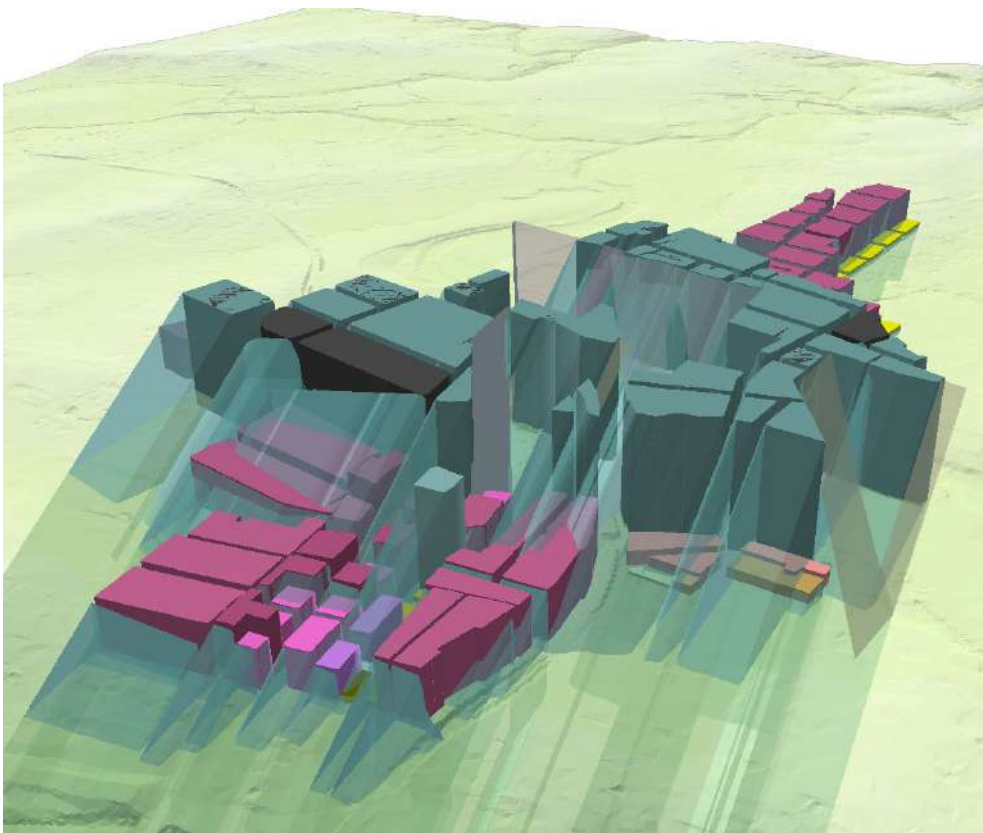


Figure 12 - Sun Shadow Volume output at 12-noon on 21 June



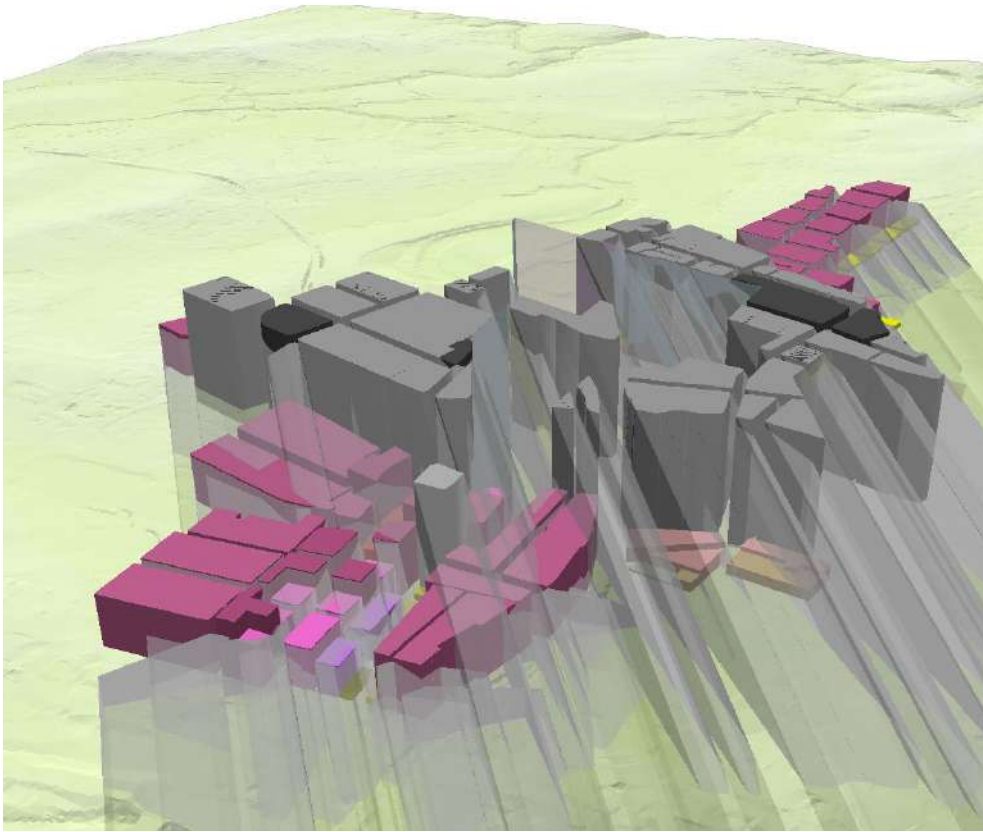


Figure 13 - Sun Shadow Volume output at 3pm on 21 June

# 4. Assessing Overshadowing of Experiment Farm

## 4.1. Introduction

This section of the Technical Paper sets out the findings of analysis on the options of overshadowing of Experiment Farm cottage and its immediate curtilage. This assessment is undertaken to address Condition 1(j)(iii) - *Incorporate an assessment of the potential overshadowing impacts on Experiment Farm that may result from the proposed planning controls (outside the proposed sun access plane of 10am–2pm) – of the Gateway Determination.*

Hector Abrahams Architects, when undertaking a heritage study of interface areas to the Parramatta CBD and surrounding conservation areas or significant items, identified a Protected Area for Experiment Farm and its curtilage and recommended that the *"Building and garden of Experiment Farm Cottage should have no additional overshadowing as a result of Parramatta CBD development. This applies throughout the day and is not limited by any time restrictions"* (Section 4.2.12, page 49). Council's response to this recommendation, which was adopted on 10 July 2017, supported this recommendation in part by amending the Draft CBD Planning Proposal to protect solar access to Experiment Farm between 10am and 2pm mid-winter. Council's response to the recommendation noted that protecting solar access beyond 2pm late into the afternoon would have significant adverse impacts on building height, and any consequent development yield, in the Parramatta CBD. This would be due to the significant elongation of any Sun Access Protection surface from Experiment Farm resulting from the low angle of inclination to the sun, particularly after 4pm.

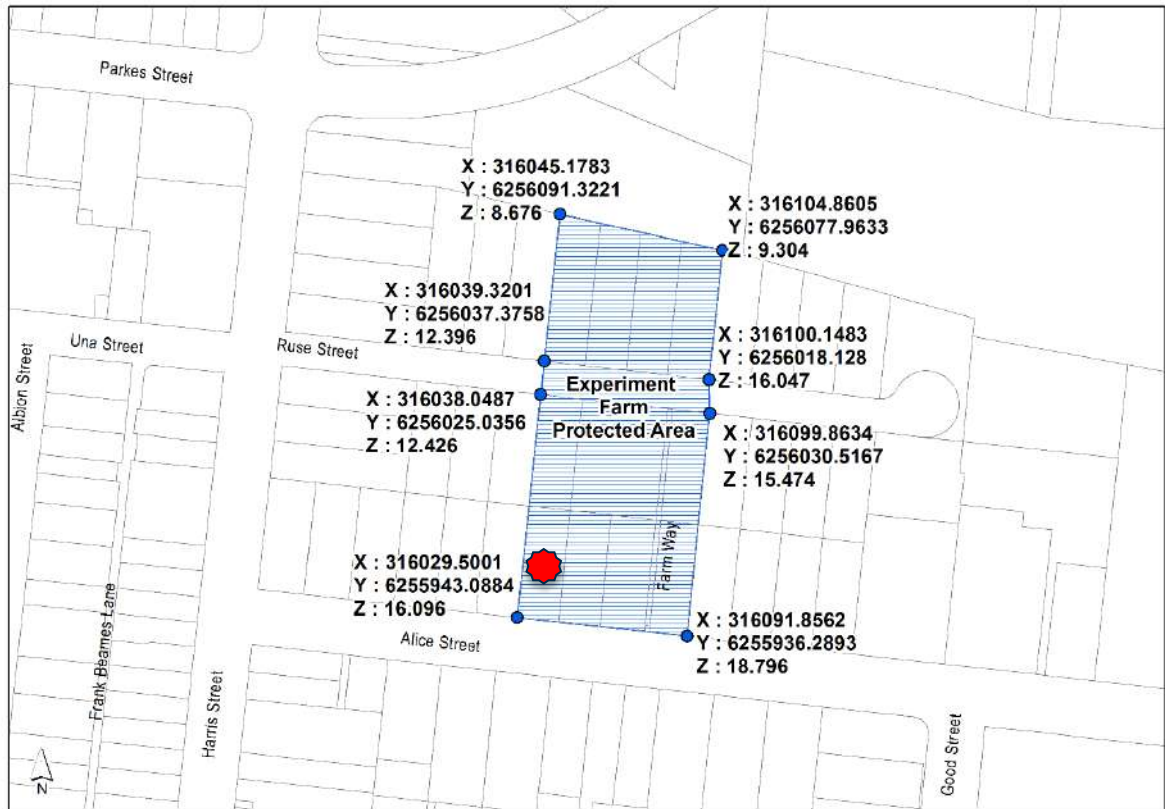
Following the deferral of the overshadowing matter from the Council meeting of 24 June, further testing was undertaken for Experiment Farm involving:

- (a) Redefining the Experiment Farm Protected Area to exclude 14 Alice Street, Harris Park. The property at 14 Alice Street does not form part of the statutory heritage listing for Experiment Farm and its curtilage; and
- (b) Testing for alternative four-hour periods of the day for sun access protection. This included between 8am and 12 midday as well as 9am and 1pm.

The results and findings of this further testing is set out in Section 4.5.

## 4.2. Analysis Method

The method to assess options to address the Gateway Determination condition involves constructing a series of three-dimensional planes starting from ground level (existing) on the northern, eastern and western edges of the Protected Area to the maximum height within the CBD of 243m (RL). The topography for the Experiment Farm cottage slopes generally downward from the south-east to the north-west. Consequently, multiple height values — ranging between 8.6m (RL) and 18.8m (RL) — were applied at various vertices and corners of the property to ensure an accurate representation of the height of ground level (existing) across the site. Figure 14 shows the coordinates and elevation used for the control points to construct the Sun Access Protection planes and surface for Experiment Farm to take account of the changes in topography. This extent was originally recommended by Hector Abrahams Architects on the study into heritage matters on interface areas to the Parramatta CBD. This extent has since been modified to align to the statutory listed area of Experiment Farm as discussed in Section 4.5 of this paper.



Extent of Protected Area originally as recommended by Hector Abrahams Architects. This extent has been modified to align with the statutory listing by removing 14 Alice Street from the Protected Area.

Figure 14 - Control points and X/Y/Z coordinates to determine sun access protection planes and surface for Experiment Farm. X/Y coordinates use Map Grid of Australia (MGA) 1994 Zone 56 projection. Z coordinates use the Australian Height Datum (AHD) and are measured in m(RL).

Details to determine the bearing (azimuth) and the angle of inclination (altitude) to the sun at nominated dates and times were obtained from the Sun and Moon Azimuth and Elevation on-line calculator provided by Geoscience Australia (source: <http://www.ga.gov.au/geodesy/astro/smpos.jsp>). Latitude and longitude coordinates for Parramatta were obtained using this on-line calculator and references the National Gazetteer of Australia — and were set at latitude 33° 48' S and longitude 151° 0' E.

The vertical height to be determined from each control point is the difference between 243m (RL) and the Z-value representing ground level (existing), which is also expressed as an RL. For example, the vertical height calculated for the north-western control point (X: 316,045.1783; Y: 6,256,091.3221; Z: 8.676) is 234.324m (i.e. 243m – 8.676m).

Figure 15 shows the planes constructed for 30-minute intervals between 10am and 4:30pm on 21 June 2018. Times of the day before 10am were not modelled as these are not impacted by development in Parramatta CBD. Planes for 5pm were also not modelled as sunset on 21 June occurs at around 4:55pm, based on Geoscience Australia's on-line calculator for sunrise and sunset times (source: <http://www.ga.gov.au/geodesy/astro/sunrise.jsp>), and the sun would be below the horizon at 5pm.

The outer extremities of the planes are then joined together to form a surface that covers the nominated period for protection. Figure 16 and Figure 17 shows two Sun Access Protection Surfaces created using the planes from Figure 15 after connecting the outer extremities of these planes together. This technique is known as creating a "convex hull". In the example for Figure 16, the extent of coverage is between 10am and 2pm, consistent with Council's currently adopted position. In the example for Figure 17, the extent of coverage is modelled to provide sunlight access protection to the Experiment Farm Protected Area between 10am and 4:30pm on 21 June – effectively "all-day" protection.

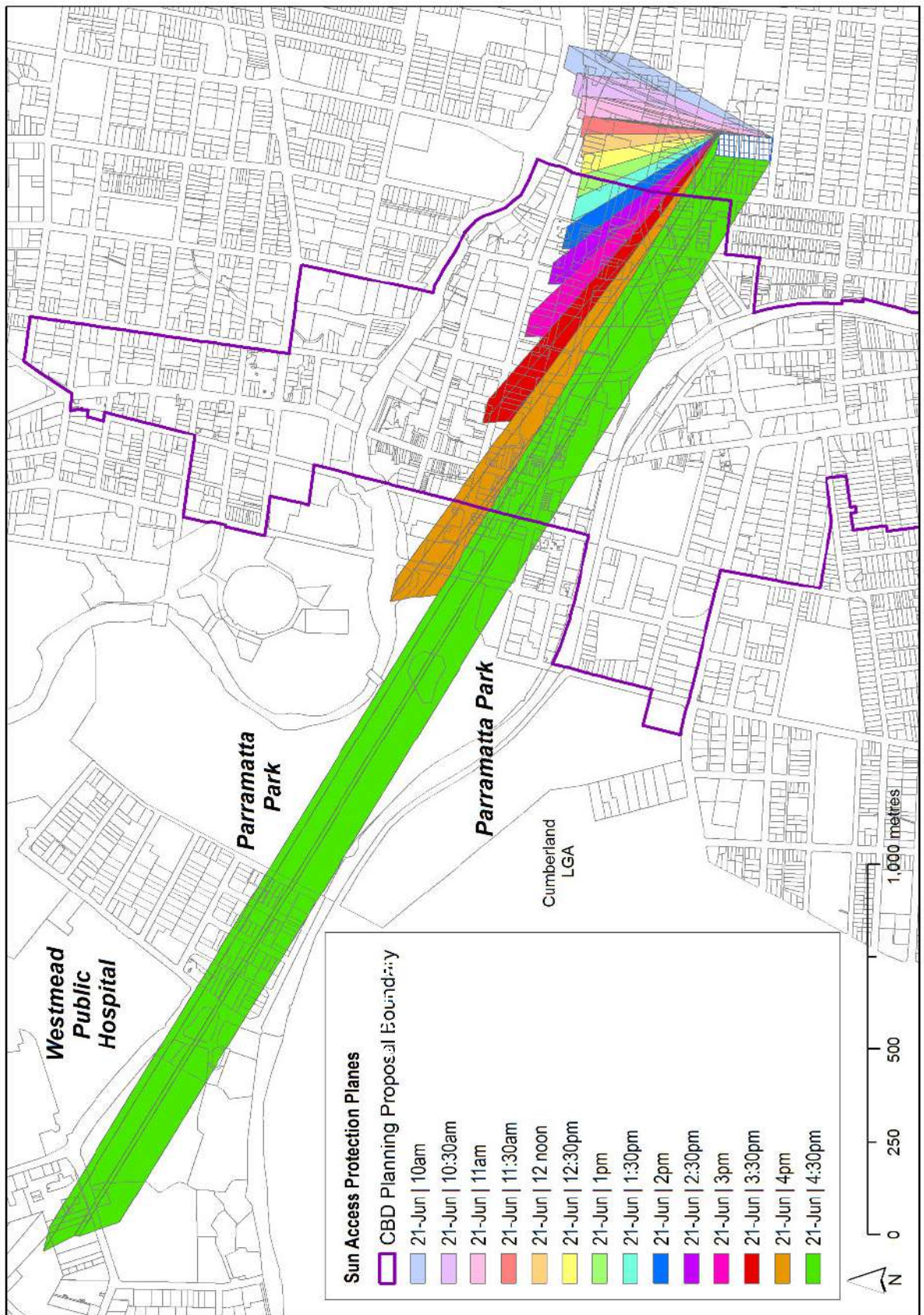


Figure 15 - Sun Access Protection Planes in Plan View for the Experiment Farm Protected Area on 21 June between 10am and 4:30pm. All times are UTC+10

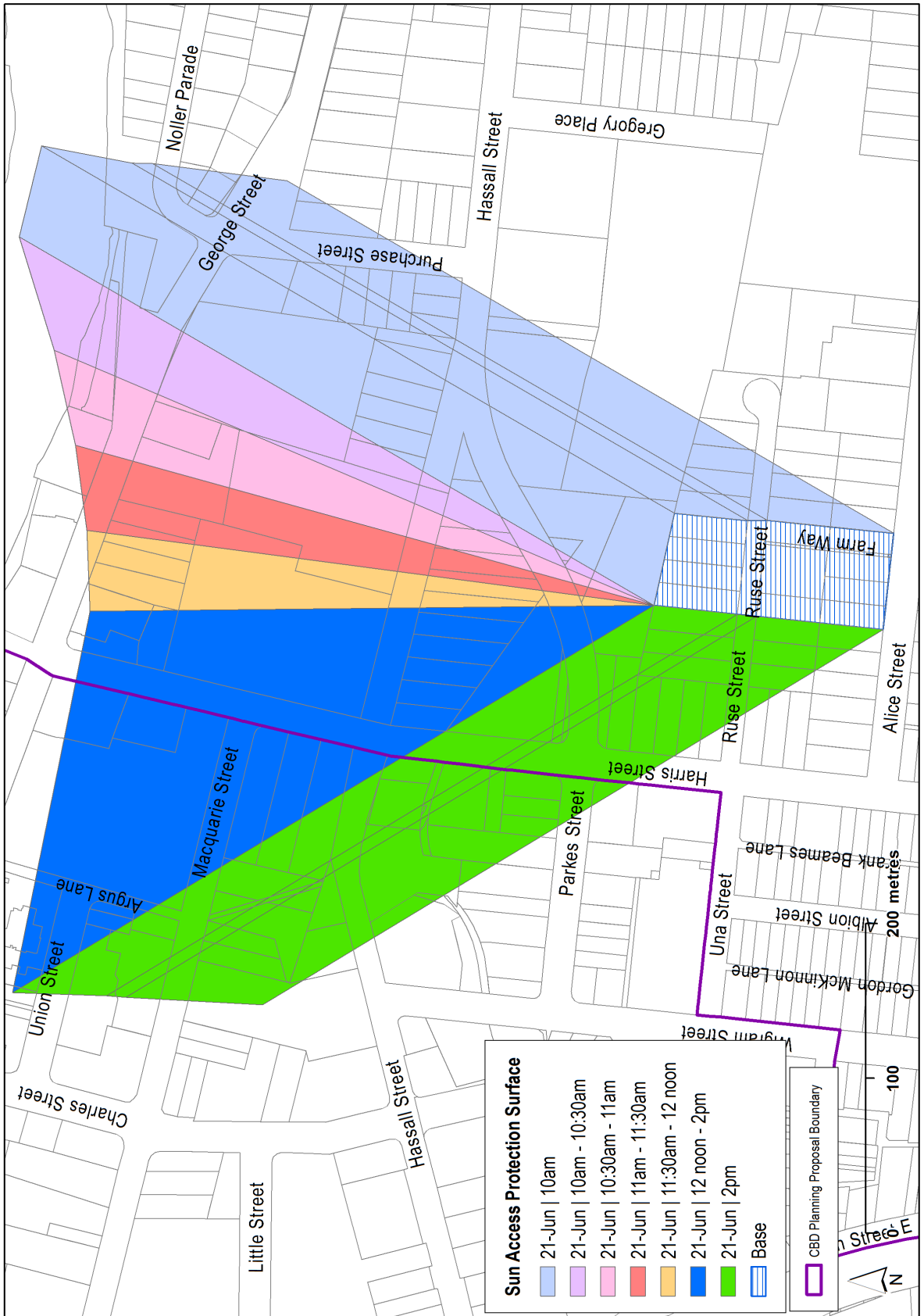


Figure 16 - Sun Access Protection Surface in Plan View for the Experiment Farm Protected Area on 21 June between 10am and 2pm. All times are UTC+10

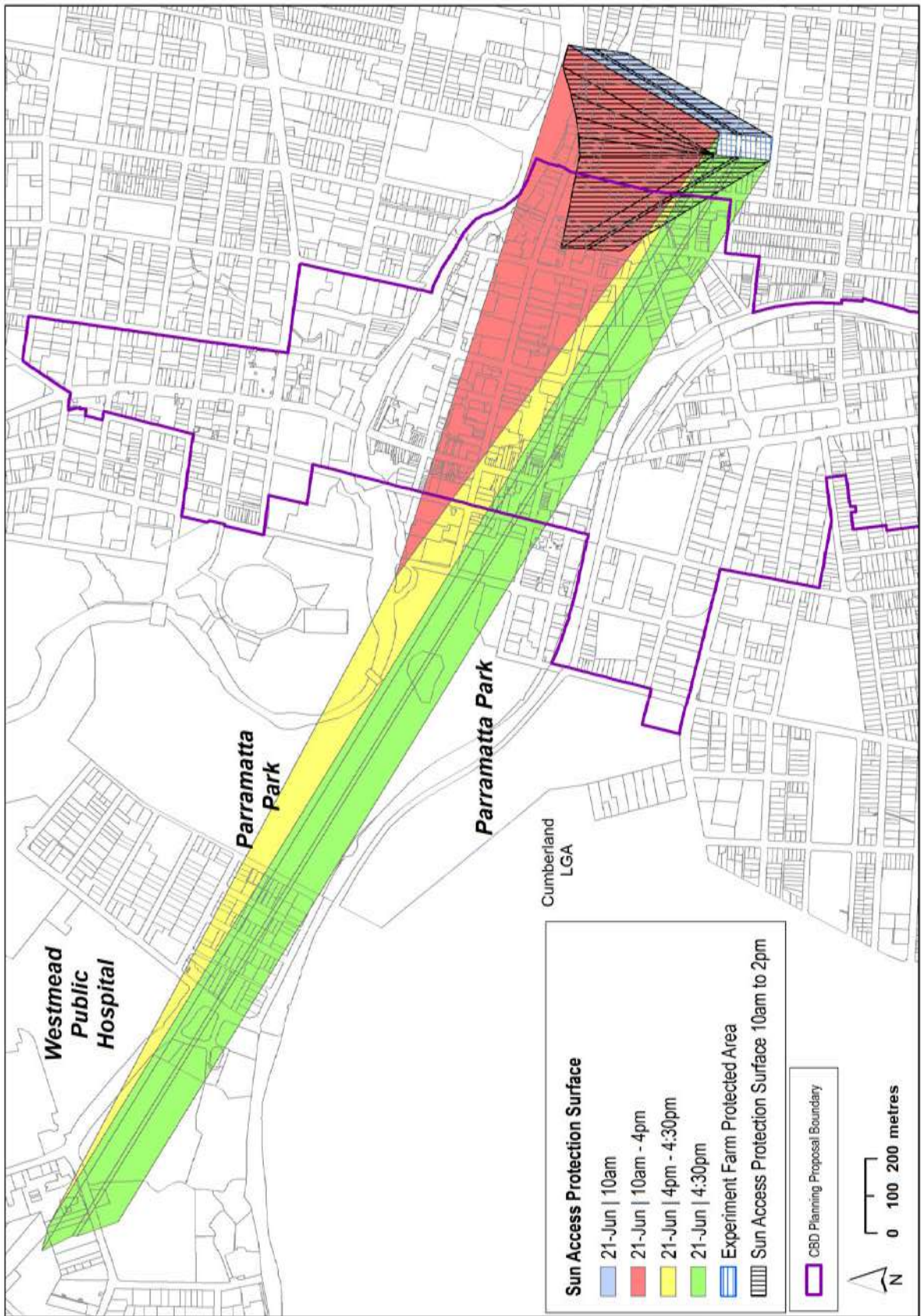


Figure 17 - Sun Access Protection Surface in Plan View for the Experiment Farm Protected Area on 21 June between 10am and 4:30pm compared with surface for 10am and 2pm (black hatched). All times are UTC+10



Figure 18 - Sun Access Protection Surface for Experiment Farm with elevation values

### 4.3. Impact Analysis of the Extended Protection Period beyond 10am to 2pm.

The impact of an “all-day” Sun Access Protection surface from Experiment Farm on the Parramatta CBD is significant. An area across the entire CBD between the railway line to the south and Phillip Street to the north will be captured by this proposed surface. The angle of inclination to the sun in the late afternoon ranges between 18.2° at 3pm to 3.9° above an ideal horizon at 4:30pm. The length of the western-most surface, as measured on the ground, ranges between 3.3km and 3.6km – putting the top edge of the surface at 243m (RL) near Westmead Private Hospital. A 4pm edge extends across the entire CBD to end at Parramatta Park (about 1.4km to 1.5km from Experiment Farm).

| Scenario<br>21 June (mid-winter) | Parcels<br>impacted | Comparison to<br>base case |
|----------------------------------|---------------------|----------------------------|
| 10am to 2pm – base case          | 36                  |                            |
| 10am to 3pm                      | 77                  | +41 parcels                |
| 10am to 4pm                      | 213                 | +177 parcels               |
| 10am to 4:30pm                   | 241                 | +205 parcels               |

Table 4 - Land parcels potentially impacted by Experiment Farm Sun Access Protection surfaces

It is worth noting that existing development already penetrates this surface with multiple buildings on the eastern side of the CBD casting a shadow over Experiment Farm in the late afternoon. Sites include the Sydney Water Headquarters in Smith Street, NSW Police Headquarters in Charles Street, 11 Hassall Street, 14 Hassall Street, 13-15 Hassall Street, and 24 Parkes Street. Development that is under construction near completion that will penetrate the late afternoon parts of the surface includes 4 Parramatta Square and 113-117A Wigram Street. Consequently, any perceived benefit of an “all-day” Sun Access Protection surface to Experiment Farm will already be compromised by existing development.

### 4.4. Implications of applying the Surface beyond 2pm on 21 June.

The implications of applying a Sun Access Protection surface beyond 2pm on 21 June are significant to future development within the Parramatta CBD due to:

- The number of additional land parcels impacted by an extended protection surface, particularly late in the afternoon;
- The limited height of buildings possible under the 4:30pm surface – which will range from 10-20m (RL) on the eastern side of the CBD to a maximum of 80-90m (RL) on the western side of the CBD near Marsden Street. This limitation of height controls will have major impacts on potential commercial and residential yield within the CBD.
- The benefit of an extended surface into the late afternoon will already be compromised by existing development – including development currently under construction or constructed within the last 10 years that is unlikely to be renewed in the foreseeable future.

### 4.5. Further refinements and testing following 24 June 2019.

Additional analysis and refinements were undertaken following the deferral of the overshadowing report by Council at the meeting of 24 June 2019. This additional analysis took into account the following:

- (a) Modification to the Experiment Farm Protected Area to exclude 14 Alice Street, Harris Park. Whilst the original analysis from Hector Abrahams Architects identified 14 Alice Street as part of the protected area, this property does not form part of the statutory heritage listing for Experiment Farm. Consequently, the Protected Area was redefined to exclude 14 Alice Street for the purposes of additional overshadowing testing for Experiment Farm. These changes modify slightly the extent of the Sun Access Protection surfaces as is discussed in this section of the Technical Paper.



- (b) Additional testing of four-hour periods throughout the day based on public forum representations at the Council meeting. Additional testing included the periods 8am to 12-midday and 9am to 1pm on 21 June.

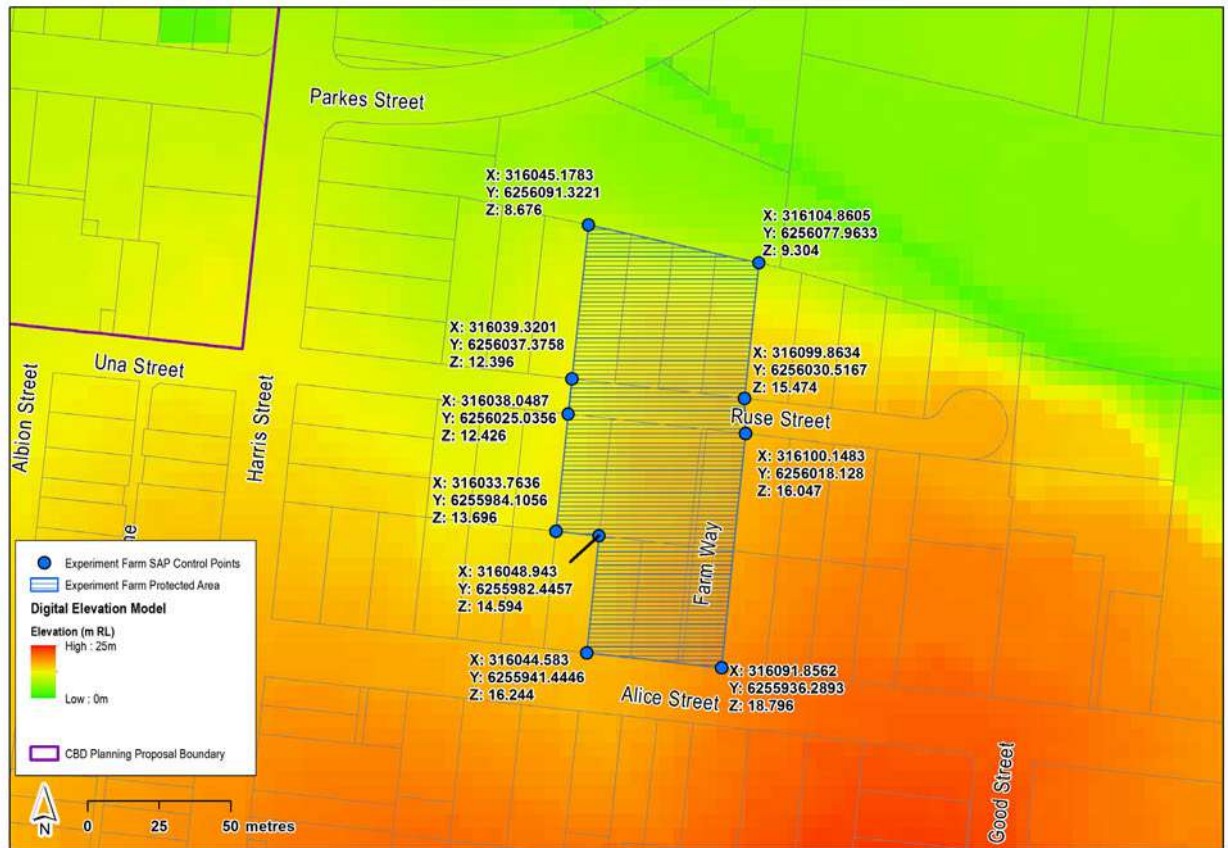


Figure 19 - Revised Experiment Farm Protected Area control points which exclude 14 Alice Street from the Protected Area.

Modification of the Experiment Farm Protected Area alters the western edge of the Sun Access Protection surface, making its geometry somewhat more complicated due to the cut-out.

Sun Access Protection surfaces for the different periods are shown below in Figure 20, Figure 21 and Figure 22.

Testing for the period 8am to 12-midday resulted in the modified Sun Access Protection Surface missing the Parramatta CBD entirely. Consequently, protecting this period of the day would be redundant as taller buildings of a scale to adversely impact Experiment Farm would not be located in areas outside the CBD. Additionally, existing height of building controls within the current Parramatta LEP 2011 are much lower than heights anticipated through this surface.

Testing for the period 9am to 1pm resulted in significantly less coverage of the Parramatta CBD – limited to less than 10 sites at the eastern edge of the CBD. Like the 8am to 12-midday testing, protection of this period would be virtually redundant.



Figure 20 - Revised Sun Access Protection Surface for the period 8am to 12-midday on 21 June



Figure 21 - Revised Sun Access Protection Surface for the period 9am to 1pm on 21 June

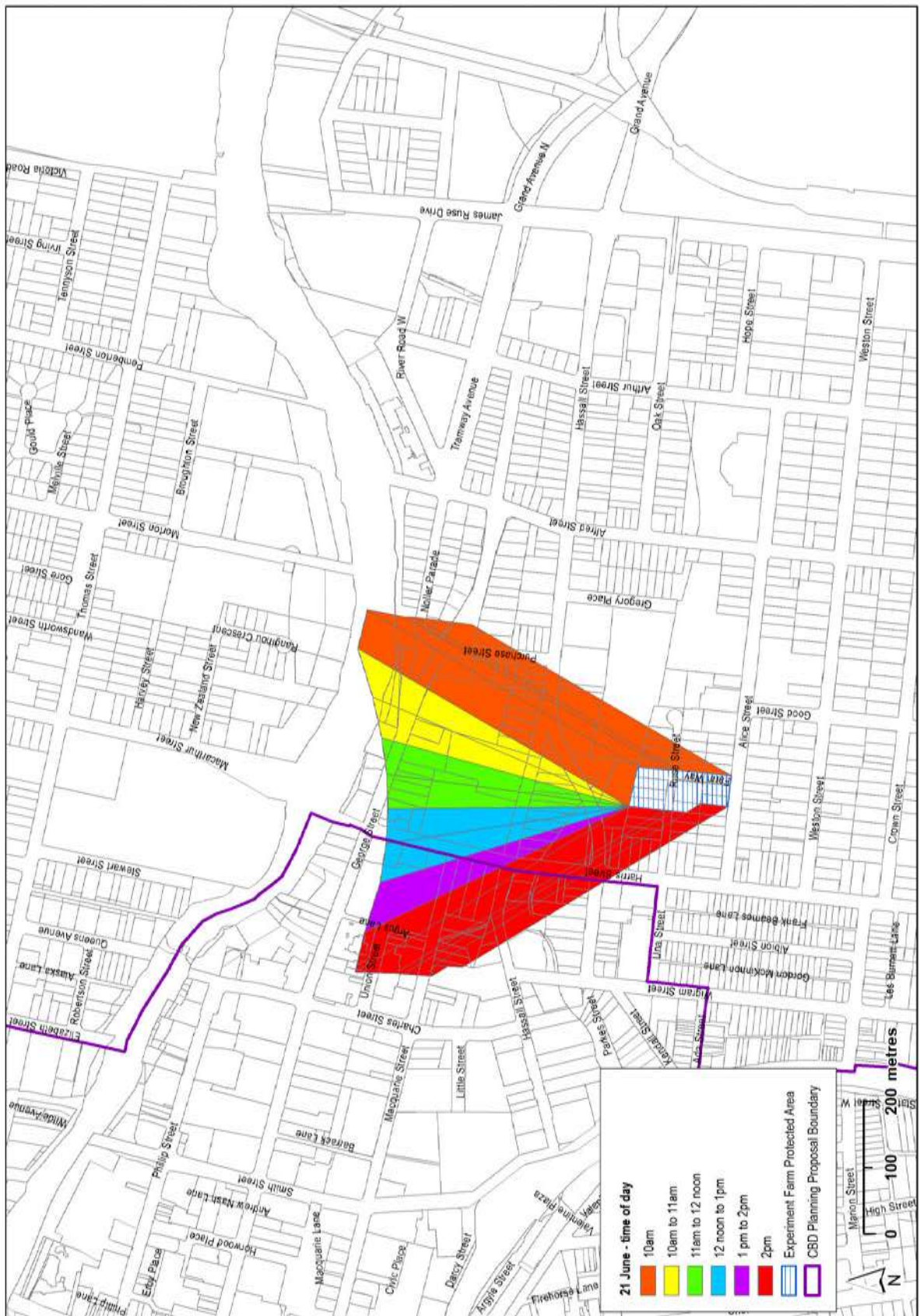


Figure 22 - Revised Sun Access Protection Surface for the period 10am to 2pm on 21 June

Testing for the currently endorsed period between 10am and 2pm resulted in a slight modification to the western edge of the Sun Access Protection surface's geometry as a result of excising 14 Alice Street, Harris Park. This moved the western edge of the surface approximately 12-15 metres to the east; and, consequently, removed the surface's coverage entirely from less than five sites and also reduced the amount of the surface's coverage to another 10 sites.

#### 4.6. Conclusions and Recommendation

There are two avenues for considering the protection of sunlight access to the Experiment Farm cottage and immediate curtilage identified by Hector Abrahams Architects from the analysis conducted:

- Maintain the currently adopted position to protect sunlight access for the period 10am to 2pm on 21 June (mid-winter) but modify the extent of the Protected Area to exclude 14 Alice Street, Harris Park, to be consistent with the statutory listing for Experiment Farm. This will meet at a minimum the condition of the Gateway Determination. In terms of land coverage and protection, this option has the greatest initial benefit as no Sun Access Protection surface currently applies to Experiment Farm. The Draft CBD Planning Proposal was amended following the resolution by the Administrator on 10 July 2017 to include a Sun Access Protection surface to Experiment Farm applying between 10am and 2pm on 21 June. Extending the protection before 10am have no impact on development within the CBD itself due to any additional surface facing the east, and therefore is of little benefit. Extending the protection beyond 2pm has major impacts on existing and potential development, particularly in the eastern parts of the CBD where height controls would need to be significantly reduced to fit under the limitations of the surface.
- Extend coverage of the Sun Access Protection surface to apply beyond 2pm on 21 June to 4:30pm. This extension effectively provides "all-day" protection to Experiment Farm from development in the CBD. However, it will significantly impact on the capability of the CBD to deliver opportunities for jobs and achieve the direction of Sydney's "Central City" due to height constraints imposed by the surface in the late afternoon. Accordingly, this option is not supported.

It is recommended that the currently adopted position of protecting sunlight access to Experiment Farm between 10am and 2pm on 21 June (mid-winter) is maintained for the purposes of addressing Condition 1(j)(iii) of the Gateway Determination. A modification to the Experiment Farm Protected Area to exclude 14 Alice Street, Harris Park, is also recommended to ensure consistency with the statutory heritage listing for Experiment Farm.

Extension of the surface to 4:30pm on 21 June to meet the recommended "all-day" condition from Hector Abrahams Architects is not supported because such a surface would overly restrict building heights within a substantial corridor of the CBD and would already be penetrated by existing development.

Modification of the four-hour period to, for example, 8am to 12-midday or 9am to 1pm is also not supported as the protection sought by the surface for these periods has limited benefit due to it applying to an area entirely or substantially outside of the CBD boundary. A decision to adjust the hours of protection before 2pm would result in the potential outcome where tall buildings built on the eastern fringe of the CBD could cast shadows over Experiment Farm from 12-midday. It should be noted that by protecting the period between 10am and 2pm has, in effect, a *de facto* protection before 10am due to the lower existing height of building controls in the area that would be covered by the earlier periods of the day.

# 5. Assessing Overshadowing of Parramatta Square

## 5.1. Introduction

This section of the Technical Paper sets out the findings of analysis on the options of overshadowing for the Parramatta Square Protected Area. This assessment is undertaken to address Condition 1(j)(iv) - *Provide further analysis to inform a sun access plane for the protected area of Parramatta Square between 12pm and 2pm, including the times of the year that the proposed controls would apply* – of the Gateway Determination; and Condition 1(o) - *Ensure protection of compensatory area of solar access at the eastern end of Parramatta Square at the Spring and Autumn equinox of the altered Gateway Determination on 27 July 2020.*

*Parramatta Local Environmental Plan 2011* defines the Parramatta Square No Additional Overshadowing area (the Protected Area) on the Sun Access Protection Map (Figure 23). The purpose of the Protected Area is to ensure sunlight access to the major civic open space and public plaza component of Parramatta Square, a significant office urban renewal precinct within Parramatta CBD, during lunchtime periods where the plaza will provide outdoor eating opportunities for thousands of workers within the Parramatta Square precinct. The Protected Area (of approximately 3,000sqm) applies to about 35 per cent of the entire civic open space and public plaza area of 8,587sqm extending from between the Town Hall and 6-8 Parramatta Square to the "amphitheatre" at the eastern end fronting onto Smith Street.

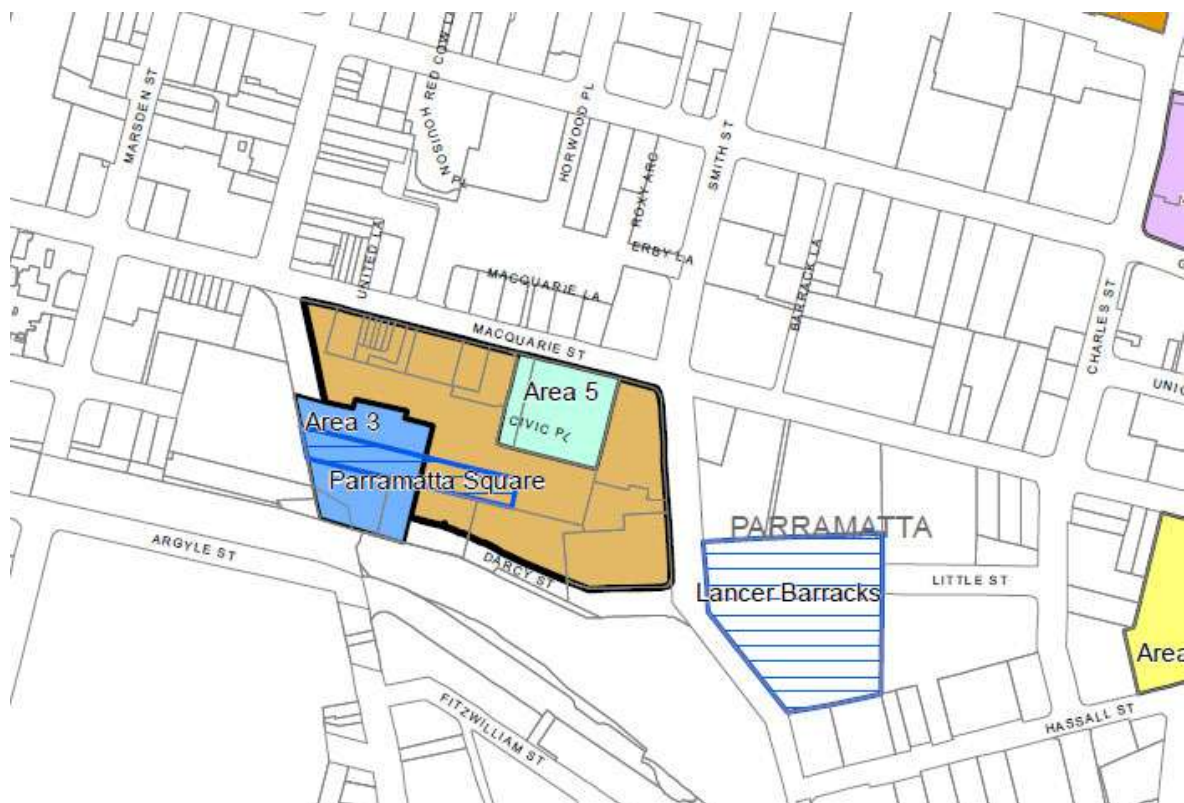


Figure 23 - Parramatta Square Protected Area (No Additional Overshadowing) – Extract from the Sun Access Protection Map of Parramatta Local Environmental Plan 2011. The Protected Area is shown in blue hatching.

## 5.2. Analysis Method

The method to assess options to address the Gateway Determination condition involves constructing a series of three-dimensional planes starting from ground level (existing) — 11m (RL) — on the northern, eastern and western edges of the Protected Area to the maximum height within the CBD of 243m (RL). Determining the bearing (azimuth) and the angle of inclination to the sun at nominated dates and times were obtained from the Sun and Moon Azimuth and Elevation on-line calculator provided by Geoscience Australia (source: <http://www.ga.gov.au/geodesy/astro/smpos.jsp>). Latitude and longitude coordinates for Parramatta were obtained using this on-line calculator and references the National Gazetteer of Australia — and were set at latitude 33° 48' S and longitude 151° 0' E.

Figure 24 shows the planes constructed for 30-minute intervals between 12-noon and 2pm on the nominated dates. In the circumstances unique to Parramatta Square, an additional date and time – 21 May at 2pm – was included for assessment due to the Protected Area's east-west orientation. When assessing overshadowing for Parramatta Square outside the period of 12-noon to 2pm on 21 June (mid-winter), 2pm on 21 May (coloured golden orange on Figure 24, below) was identified as an outlier between 21 June (coloured brown) and the nominated dates of 31 August (coloured peppermint green) and 23 September (coloured blood orange). Consequently, 2pm on 21 May was included as an additional date and time for the purposes of developing Sun Access Protection Plane and Surfaces for Parramatta Square for periods outside of 21 June (mid-winter).

The outer extremities of the planes are then joined together to form a surface that covers the nominated period for protection. Figure 25 shows the Sun Access Protection Surface created using the planes from Figure 24 after connecting the outer extremities of these planes together. This technique is known as creating a "convex hull". In the example for Figure 25, the extent of coverage is modelled to provide year-round sunlight access protection to the Parramatta Square Protected Area.



Figure 24 - Sun Access Protection Planes for Parramatta Square in plan view



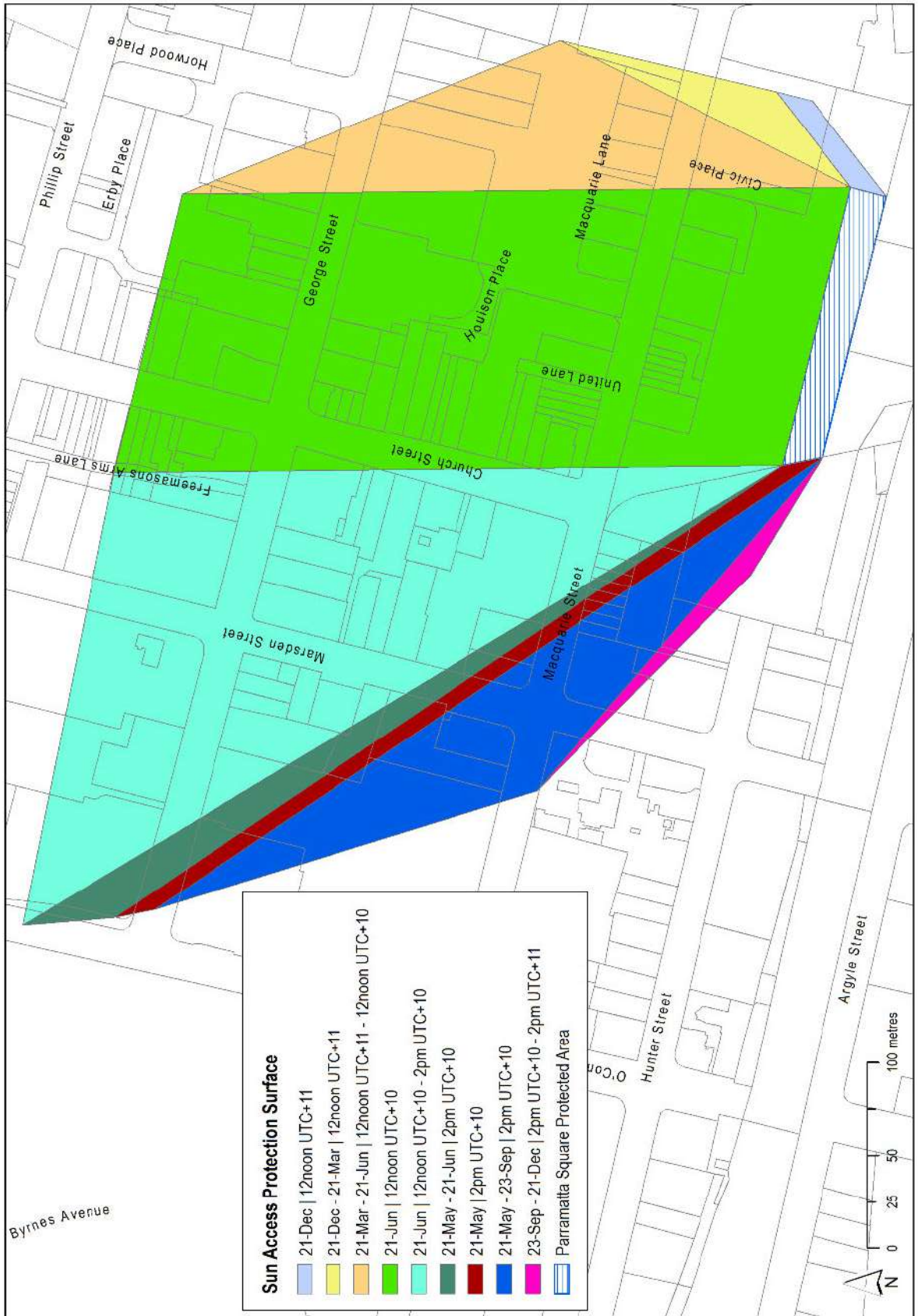


Figure 25 - Sun Access Protection Surface for Parramatta Square showing year-round protection in plan view

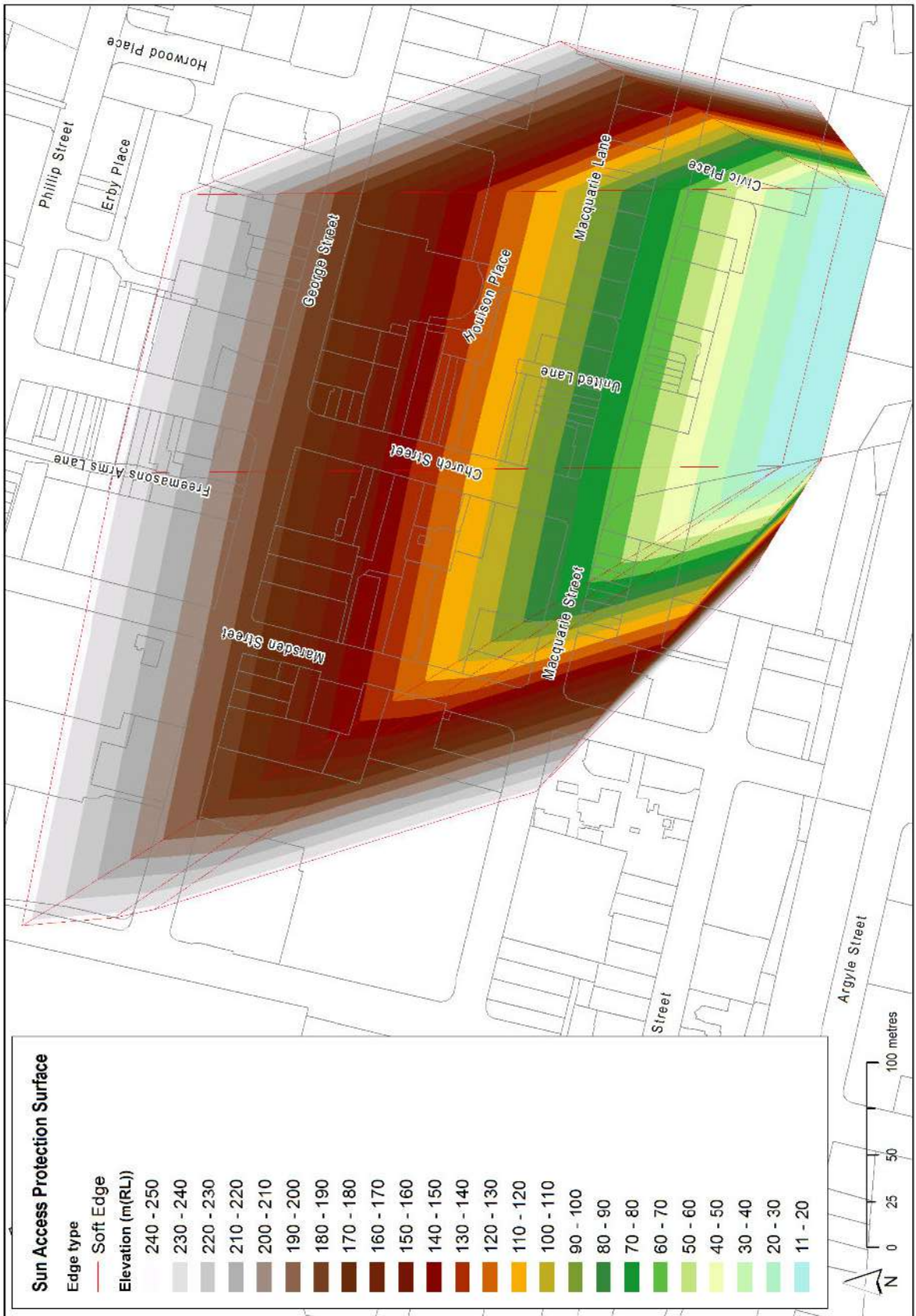


Figure 26 - Sun Access Protection Surface for Parramatta Square with elevation values

It is to be noted that Sun Access Protection surface will not affect development subject to existing planning controls west of Marsden Street, as (a) these controls will not be changed under the Parramatta CBD Planning Proposal; and (b) the existing controls are lower than the elevation of the Sun Access Protection surface. The lowest elevation of the surface on land west of Marsden Street is between 120m and 130m (RL) – or about 110m to 120m above ground (existing) – as shown in Figure 26. Current planning controls applying to land west of Marsden Street that would be subject to the Sun Access Protection surface have a maximum building height of 54m.

### **5.3. Impact Analysis of the Surface options.**

Four scenarios to evaluate the impacts by the proposed protection surface from Parramatta Square are identified. The base hours to require sunlight access to the Protected Area have been kept at 12-noon to 2pm; and the assessment considers impacts for various periods of the year. The following periods have been identified for assessment:

- 12-noon to 2pm on 21 June (mid-winter) only (see Figure 27);
- 12-noon to 2pm for the period 14 April to 31 August (see Figure 28);
- 12-noon to 2pm for the period 21 March (autumn equinox) to 23 September (spring equinox) (see Figure 29); and
- 12-noon to 2pm for the period 21 December to 21 December (year-round) (see Figure 30).

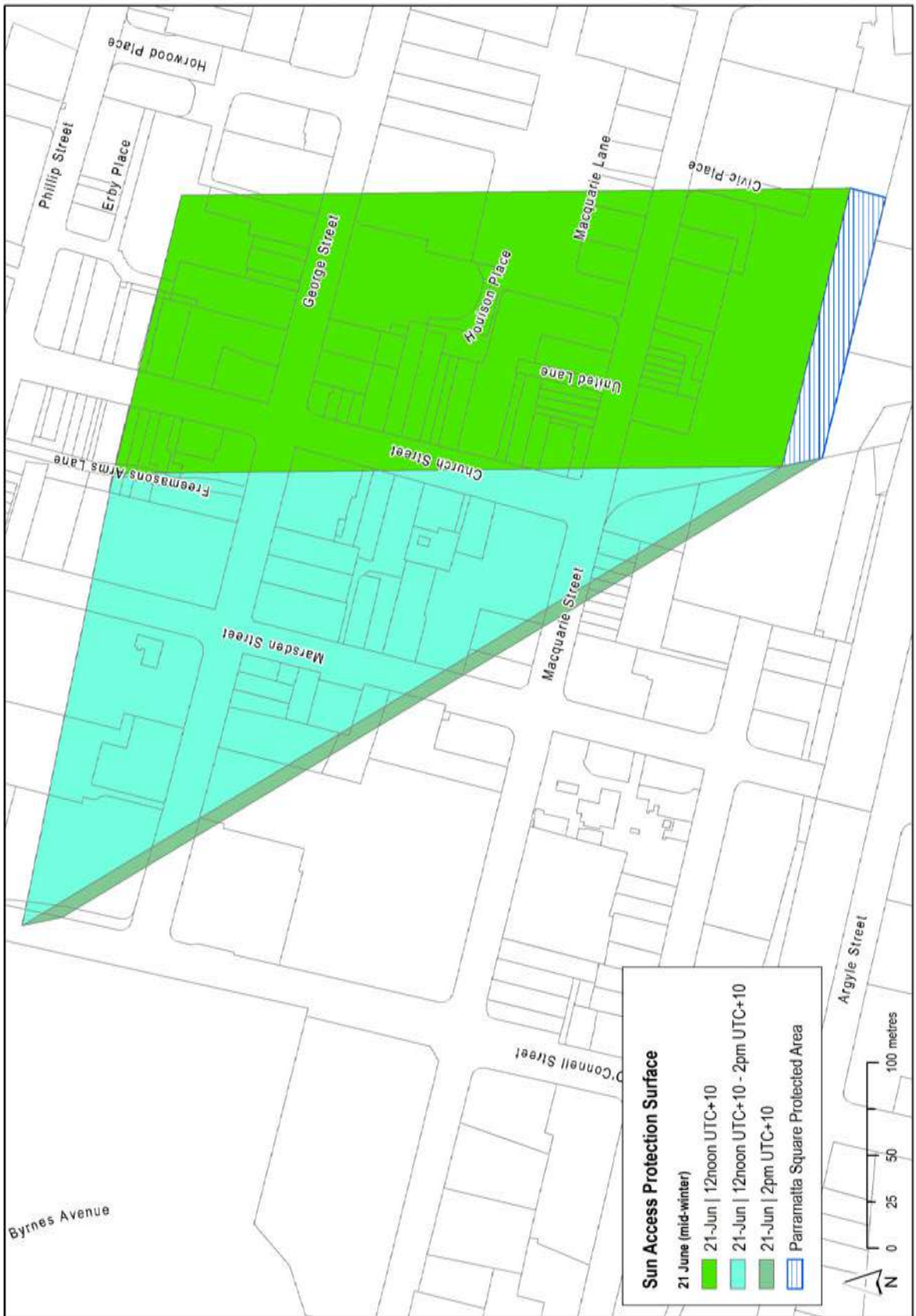


Figure 27 - Sun Access Protection Surface – 12-noon to 2pm on 21 June 2018 - Mid-winter protection

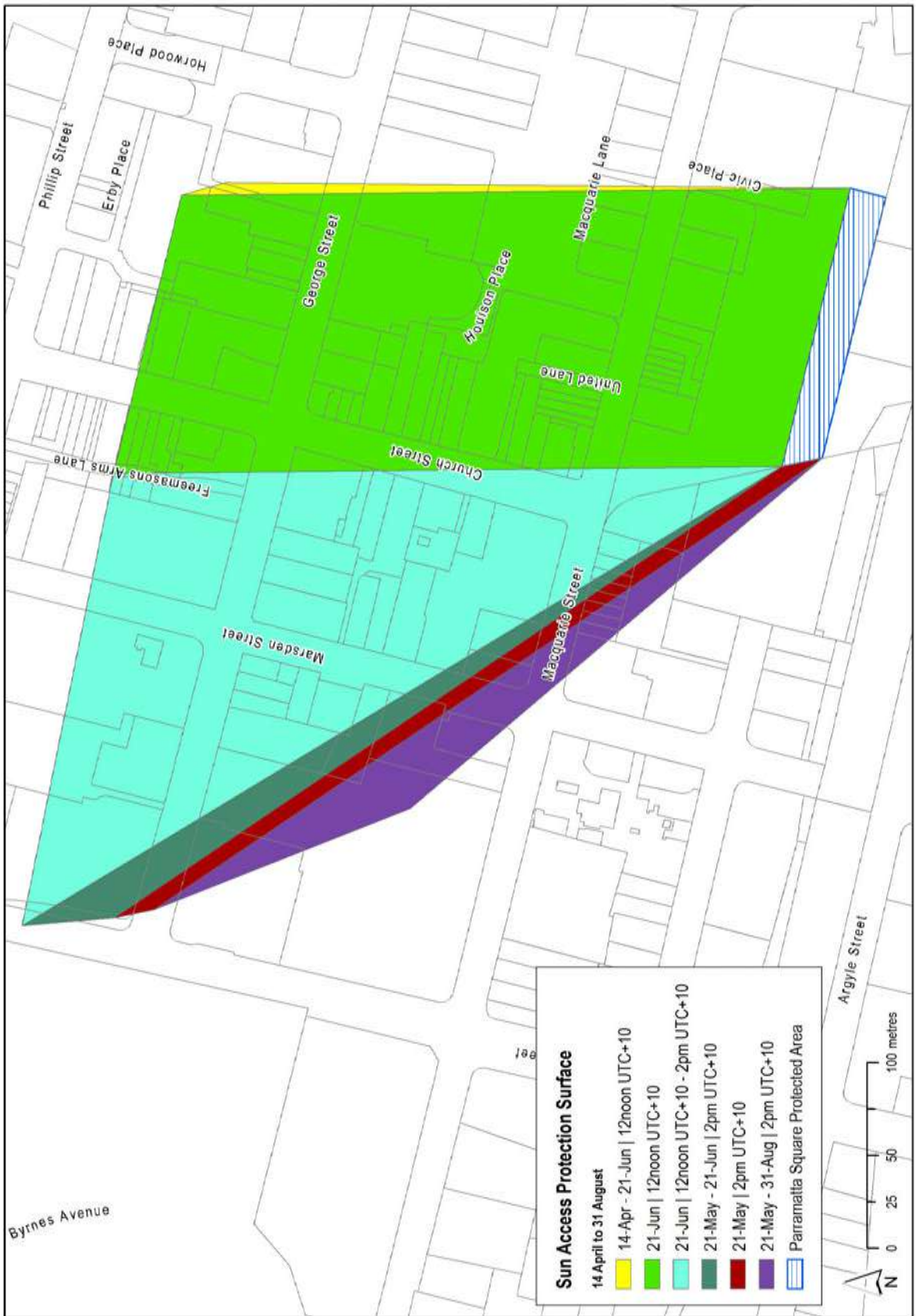


Figure 28 - Sun Access Protection Surface – 12-noon to 2pm for the period 14 April to 31 August



Figure 29 - Sun Access Protection Surface – 12-noon to 2pm for the period Autumn Equinox to Spring Equinox



Figure 30 - Sun Access Protection Surface – 12-noon to 2pm for Year-round protection

Between 107 and 121 land parcels are wholly or partly impacted by the four options, above, for Sun Access Protection surfaces for Parramatta Square. These are set out in Table 5 and shown in Figure 31. The same number of land parcels are impacted for the equinox-to-equinox or the year-round scenarios; and the proportion of the land subject to the additional coverage between the equinox and mid-summer is slightly greater.

| Scenario<br>12-noon to 2pm   | Parcels<br>impacted | Comparison to<br>base case |
|--|---------------------|----------------------------|
| 21 June (mid-winter) – base case   | 107                 |                            |
| 14 April to 31 August (nominated dates)  | 112                 | +5 parcels                 |
| 21 March to 23 September (equinox to equinox)<br>21 December to 21 December (year-round) | 121                 | +14 parcels                |

Table 5 - Land parcels potentially impacted by Parramatta Square Sun Access Protection surface



Figure 31 - Land parcels potentially impacted by scenarios for Parramatta Square Sun Access Protection surface

#### 5.4. Implications of the Surface and relationship with the Lancer Barracks Surface

The additional land parcels affected beyond the base case of 21 June are minimal. This is mainly due to the Parramatta Square surface partly overlapping with the Sun Access Protection Surface from Lancer Barracks for the eastern portion. The overlapping extent between the two surfaces is shown on Figure 32 where the black-hatched area is the Sun Access Protection Surface for Lancer Barracks on 21 June between 12-noon and 2pm and the orange-hatched area is the Sun Access Protection Surface for Parramatta Square for year-round protection between 12-noon and 2pm.



In the area where the two surfaces overlap, the heights allowable to protect overshadowing of Lancer Barracks are lower than the corresponding heights allowable to Parramatta Square. This is due to the overlapping part of the surface from Lancer Barracks being applied at 2pm, compared to 12-noon for Parramatta Square.



Figure 32 - Overlapping Sun Access Protection Surfaces for Parramatta Square and Lancer Barracks

Consequently, those parcels coloured green on Figure 31 will already have their maximum height limited to an existing Sun Access Protection surface from Lancer Barracks, which is currently modelled for 12-noon to 2pm on 21 June. In that situation, the green coloured parcels are more adversely impacted in terms of height from the Lancer Barracks surface compared to Parramatta Square, as the slope of the east-facing surface for the period from 21 December (mid-summer) extending to 21 June is initially steeper than that for Lancer Barracks.

Where the two surfaces overlap on 21 June – Parramatta Square at 12-noon and Lancer Barracks at 2pm – the heights allowable on the Parramatta Square surface are slightly lower than those for Lancer Barracks, as shown in Figure 33. Normally it is expected that a 2pm surface should be lower than a 12-noon surface. In this case, however, the lower base height of the Parramatta Square surface at 11m (RL) compared to the base height of Lancer Barracks at 13-16m (RL) combined with the more northerly location of the Parramatta Square protected area results in the Parramatta Square surface being lower on 21 June.

For other periods of the year, the angle of the Parramatta Square surface extends above the Lancer Barracks surface, and the impact of the existing Lancer Barracks surface is more limiting on building heights. The implications of this is only those six parcels coloured blue on Figure 31 will be newly impacted by the introduction of any Sun Access Protection surface to Parramatta Square, and only should Council consider extending the coverage of the surface beyond 21 June.

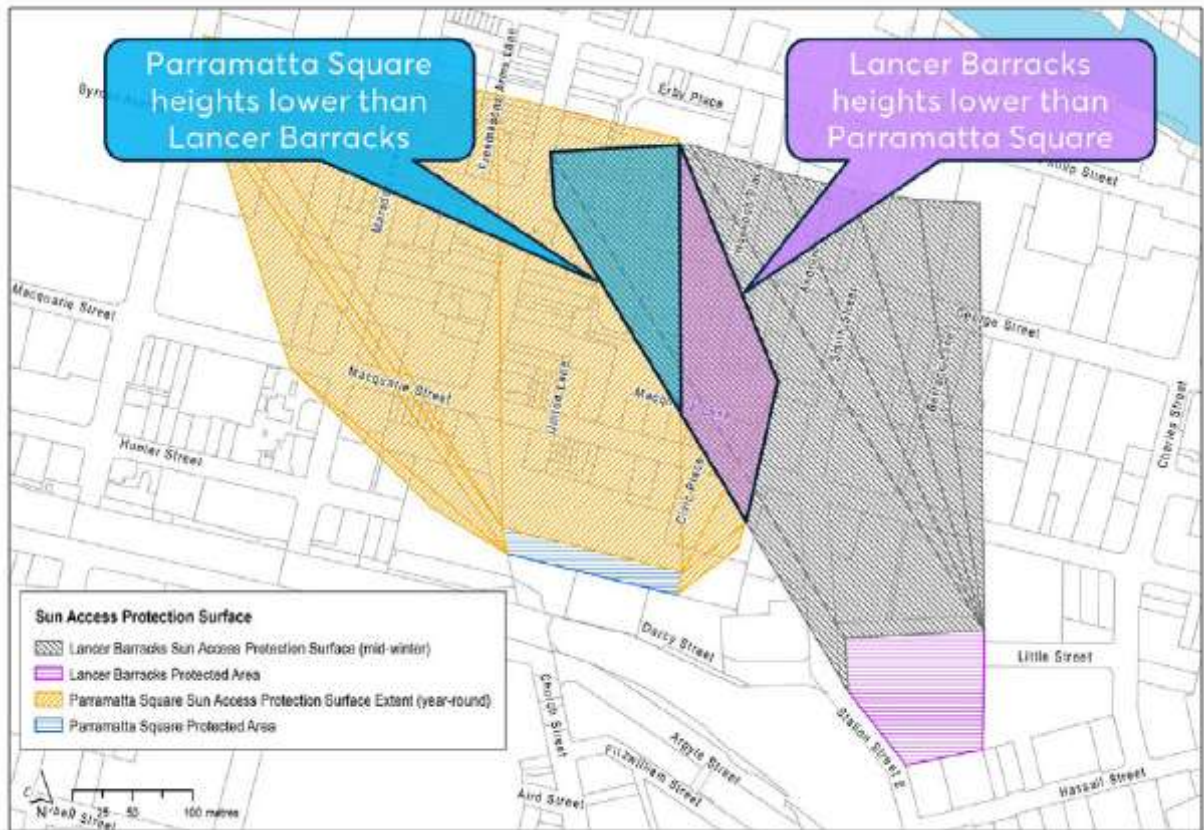


Figure 33 - Interaction between the Sun Access Protection surfaces of Parramatta Square and Lancer Barracks

### 5.5. Minor Overshadowing incursions into the Parramatta Square Protected Area

This section of the Technical Paper considers the potential impacts of minor incursions of overshadowing to the Parramatta Square Protected Area. The Parramatta CBD Planning Proposal intends to replace the existing Clause 7.4 —Sun Access Protection, as follows:

- (1) *The objective of this clause is to protect the following land from overshadowing:*
  - (a) *public open space in Parramatta Square, Prince Alfred Square, the Parramatta River Foreshore and Jubilee Park; and*
  - (b) *heritage items and curtilage at the Lancer Barracks site and Experiment Farm.*
- (2) *This clause applies to land identified on the Sun Access Protection Map (as shown coloured purple).*
- (3) *Development consent must not be granted to development on land to which this clause applies that results in any part of a building causing additional overshadowing, on 21 June in any year, on any of the following locations (as shown with blue hatching on the Sun Access Protection Map) during the times specified in relation to those locations:*
  - (a) *Prince Alfred Square—between 12.00 and 14.00,*
  - (b) *Parramatta River Foreshore—between 12.00 and 14.00,*
  - (c) *Lancer Barracks site—between 12.00 and 14.00,*
  - (d) *Jubilee Park—between and 12.00 and 14.00,*
  - (e) *Parramatta Square—between 12.00 and 14.00,*
  - (f) *Experiment Farm—between 10.00 and 14.00.*

- (4) *Development results in a building causing additional overshadowing if the total overshadowing of the relevant location during the specified times would be greater after the development is carried out than the overshadowing of that location during the specified times caused by buildings existing on the commencement of this Plan.*
- (5) *Despite subclauses (3) and (4), some minor additional overshadowing may be permitted on Parramatta Square by the following parts of a building, provided those parts have been designed to minimise any overshadowing:*
  - (a) *non-useable parts, including structural elements (such as columns and pillars), spires, flag poles, public art, a sculpture or artwork, a community notice or public information sign, and architectural roof features (as defined in clause 5.6, but excluding equipment for servicing the building, such as plant, lift motor rooms, fire stairs and the like);*
  - (b) *heritage parts, being those parts of the building which are directly part of the restoration of a heritage item on a site (should one exist); and*
  - (c) *amenity parts, being those parts that directly provide for pedestrian amenity at ground level, including shelters, playground equipment, shade structures, awnings and street furniture.*

Particularly, subclause (5) provides for the fact that certain building elements or public domain elements as specified in the clause may create minor incursions of additional overshadowing into the Parramatta Square Protected Area. It intends to provide opportunity for a merit-based assessment to consider minor incursions of additional overshadowing into the Protected Area.

When assessing the potential impacts of additional overshadowing cast by these specified elements, incursions cast by such elements are considered minor compared to the significant bulk of a building's form. Elements such as spires and flag poles are proportionally very narrow in the horizontal profile compared to the vertical profile. For example, a flag pole may have a height of 9 metres but will have a width of 100mm (10cm) at the base tapering to 50mm (5cm) at the tip. The shadow length cast by the 9m high flag pole will range between 14 metres at 12-midday and 19 metres at 2pm. The width of the shadow will still be consistent with the physical width of the flagpole (ranging between 100mm at the base and 50mm at the tip). Impacts of such a minor nature are considered unlikely to result in compromised amenity for the Parramatta Square Protected Area as such narrow horizontal profile objects will have a shadow that does not linger in one location for a prolonged period — i.e. the shadow will move quickly as the sun moves across the day.

Elements that may cause additional overshadowing associated with the conservation or restoration of a heritage item are generally constrained by other heritage controls and conservation management plans. The heritage controls would limit significant additional bulk and scale (including height) beyond the profile of an existing heritage building. Accordingly, additional overshadowing caused by these elements is anticipated to be minimal. For example, replacement or refurbishment of finials, spires, or other historical design features of a heritage building would likely have minimal additional impacts on overshadowing to the Parramatta Square Protected Area; and the additional impacts of overshadowing, if any, would be considered reasonable in ensuring heritage buildings that contribute to Parramatta CBD's character and historic streetscapes are conserved or preserved appropriately.

Elements installed at ground level, such as shelters, public domain street furniture (e.g. seats, planter boxes, phone booths, and the like) are predominantly low-scale and a small overall footprint with a localised shadow profile commensurate with the low vertical scale of the element. Again, the potential impacts of additional overshadowing cast by these elements are considered minor compared to the significant bulk cast by tall buildings potentially surrounding Parramatta Square. Accordingly, the creation of additional shadows by such elements on the Protected Area would be considered reasonable in the circumstances.

Recognition of such minor incursions by way of this proposed clause is consistent with a similar approach to overshadowing adopted by the City of Sydney in the *Sydney Local Environmental Plan 2012* where additional overshadowing of certain public spaces (including the likes of Martin Place and Pitt Street Mall)

is not allowed *unless* the overshadowing is caused by playground equipment, shade structures, awnings, sculptures or artworks, or a community notice or public information sign.

### 5.6. Additional protection of solar access to Parramatta Square between the Autumn and Spring Equinoxes

Further analysis was sought by the Department in respect of protecting solar access to Parramatta Square extending to the Autumn and Spring equinoxes (21 March and 23 September, respectively) and is reflected in Condition 1(o) of the altered Gateway Determination issued on 27 July 2020. The analysis undertaken previously in Section 5.3, above, indicated 14 additional land parcels that would be impacted if the Sun Access Protection surface was extended to include the equinoxes. Of these, nine were located to the east of the Parramatta Square Protected Area and were already impacted by the more onerous Lancer Barracks surface for mid-winter at 2pm. Therefore, only five additional parcels to the west of the Protected Area would be newly impacted by the extension of the surface to include the equinoxes.

The Incentive Height of Building controls proposed in the draft Parramatta CBD Planning Proposal did not result in overshadowing to the Parramatta Square Protected Area on 21 June at mid-winter. However, they could theoretically result in overshadowing to the Protected Area after 1pm on the equinoxes. The Department raised concerns to Council about this proposition and sought further analysis to test whether the impacts of overshadowing *inside* the Protected Area after 1pm on the equinoxes under the draft CBD Planning Proposal controls can be mitigated by the provision of equivalent solar access to the public domain *outside* the Protected Area at the same time (i.e. a compensatory area of solar access as referred to in Condition 1(o)).

Testing applied extruded 3D volumes to represent the full extent of the proposed height controls; and the use of extruded volumes for modelling overshadowing is discussed in Section 3.3 of this Paper. It also included detailed 3D models for existing buildings at 1 Parramatta Square (Western Sydney University), the recently completed 3 Parramatta Square, and the proposed Council Chambers building at 5 Parramatta Square, as shown in Figure 34, below.

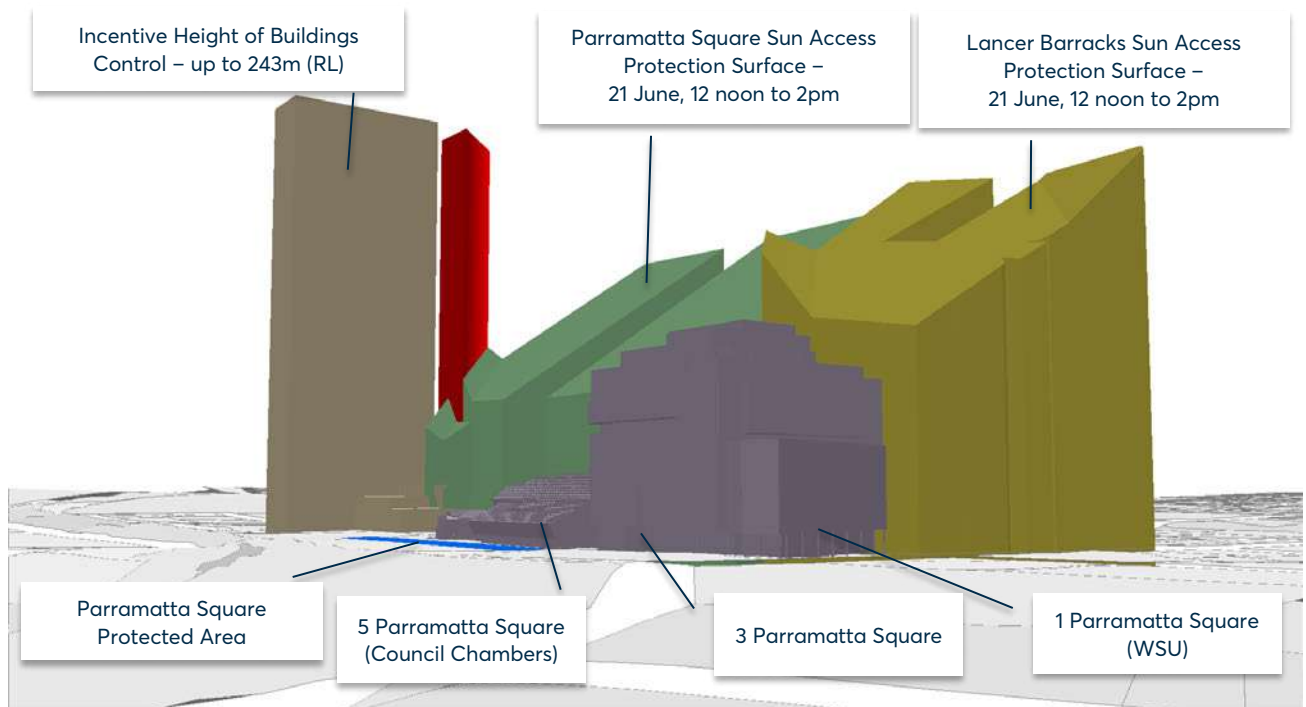


Figure 34 - 3D model of proposed controls and buildings used in the testing

Testing of the shadow extents was undertaken at 30-minute intervals between 12 noon and 2pm on the Spring equinox – 23 September. Modelling the 23 September equinox better enables the testing of higher development controls that are located to the west of the Protected Area, which could theoretically overshadow the Protected Area in the latter part of the afternoon. Modelling overshadowing based on the 23 September equinox is also a more onerous test as it adopts NSW Standard Time (UTC+10) instead of NSW Summer Time (UTC+11) as defined in the *Standard Time Act 1987*. However, the angle of inclination to the sun is identical on the Spring and Autumn equinoxes and therefore the results from 23 September would be similarly reflected on 21 March before adjusting for “daylight saving” (noting also that NSW Summer Time ends soon thereafter on the first Sunday in April).

3 Parramatta Square (NAB tower) was designed to avoid overshadowing to the Parramatta Square Protected Area between 12 noon and 2pm on 21 June (mid-winter) pursuant to the planning controls applying at the date of that development’s approval, particularly clause 7.11(2)(f) of Parramatta Local Environmental Plan 2011 (which still currently applies).

Modelling of the extended protection to the equinoxes inevitably resulted in overshadowing by the recently completed 3 Parramatta Square to the eastern end of the Protected Area between 12 noon and 12:30pm (UTC+10) on 23 September; and will likely cause equal to or more overshadowing to the eastern end of the Protected Area on 21 March during NSW Summer Time between 12 noon and 1:30pm (UTC+11), which equates to 11am to 12:30pm NSW Standard Time (UTC+10). As this building is already recently completed, the ability of the Parramatta CBD Planning Proposal to address this existing overshadowing impacts in this particular case is limited.

Proposed Incentive Height of Buildings controls applying to 57 Macquarie Street and part of 20-22 Macquarie Street of up to 243m (RL) (to the west of Parramatta Square) would commence overshadowing of the western part of the Protected Area between 1pm and 1:30pm (UTC+10) on the 23 September equinox, which equates to between 2pm and 2:30pm (UTC+11) on the 21 March equinox (i.e. after the conclusion of the protection period between 12 noon and 2pm).

The results of the analysis demonstrated that:

- There will likely be some overshadowing caused by the existing 3 Parramatta Square (NAB tower) at the 21 March equinox to the eastern portion of the Protected Area of Parramatta Square on 21 March during daylight savings between 12 noon and 1:30pm (UTC+11). However, given this tower is already completed, this reflects an existing situation.
- Overshadowing of the western portion of the Protected Area on the 23 September equinox is predominantly caused by proposed new height controls to the west of Parramatta Square between 1pm and 2pm (UTC+10), however, there will be equivalent compensatory areas of the wider Parramatta Square public domain still in sunlight, as shown by the results of the analysis in Table 6 – , below.

| Time at 23 September Equinox | Land area <i>inside</i> the Protected Area that is overshadowed | Land area <i>outside</i> the Protected Area remaining in sunlight | Adequate Compensatory Area <i>outside</i> the Protected Area to offset overshadowing in the Protected Area? |
|------------------------------|---|---|---|
| 12 noon (UTC+10)             | 16 sqm  | 1,754 sqm   | Yes   |
| 12:30pm (UTC+10)             | NIL   | 2,142 sqm   | Not Applicable – Protected Area not overshadowed  |
| 1:00pm (UTC+10)              | NIL   | 2,560 sqm   | Not Applicable – Protected Area not overshadowed  |
| 1:30pm (UTC+10)              | 726 sqm   | 2,840 sqm   | Yes   |
| 2:00pm (UTC+10)              | 1,564 sqm   | 2,410 sqm   | Yes   |

Table 6 – Comparison of overshadowing to test provision of adequate compensatory area outside the Parramatta Square Protected Area at the September equinox based on the Parramatta CBD Planning Proposal Incentive Height of Buildings controls.

Diagrams illustrating the results of the overshadowing testing at each 30-minute interval are provided at Appendix 8.

In order to ensure that designs of future development to the west of the Parramatta Square Protected Area will provide adequate compensatory area to offset any encroachment of overshadowing into the Protected Area at the equinoxes, the Planning Proposal is recommended to be amended to specifically identify certain land generally to the west of the Protected Area, which is not subject to the 21 June Sun Access Protection Surface, to apply additional controls at the equinoxes. The amended clause would require development on certain land to the west of Parramatta Square (referred to as Areas “A” and “B”) to not overshadow the Parramatta Square Protected Area between 1pm and 2pm on 21 March and 23 September, inclusive, in any year unless there is an equivalent-sized publicly accessible area outside the Protected Area, that is unaffected by overshadowing, at the eastern end of the wider Parramatta Square public domain area at the corresponding time.

This additional control would apply to the land identified as Areas “A” and “B” on the Sun Access Protection Map, as extracted on Figure 35, and includes:

- Part of 195 Church Street (Lot 1 DP 1110057);
- 38 Hunter Street (Lot M DP 15108);
- 87 Marsden Street (Lot 10 DP 788411);
- 57 Macquarie Street (Lot 1 DP 747730);
- 65-83 Macquarie Street (Lots E to L, DP 15108); and
- 20 Macquarie Street (Lot 1 DP 503651 and Lot 1 DP 501663).

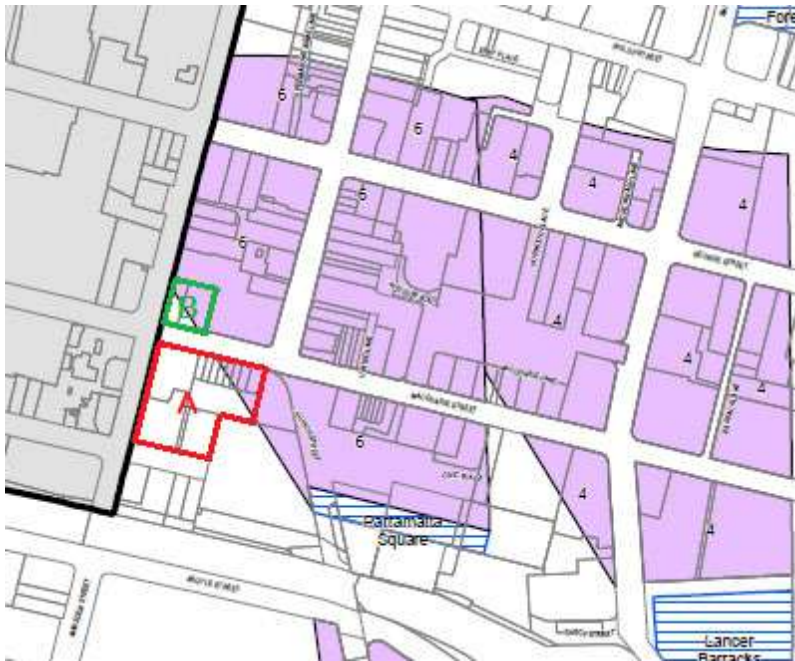


Figure 35 - Land required to ensure adequate compensatory area to offset overshadowing of the Parramatta Square Protected Area between 1pm and 2pm on 21 March and 23 September

## 5.7. Conclusions and Recommendation

There are three avenues for ensuring sunlight access to Parramatta Square from the analysis conducted:

- Maintain the currently adopted position to protect sunlight access for the period 12-noon to 2pm on 21 June (mid-winter). This will meet at a minimum the condition of the Gateway Determination. In terms of land coverage and protection, this option has the greatest initial benefit. Extending the protection to periods beyond mid-winter will augment the benefit with minor impacts on additional land parcels.
- Extend coverage of the Sun Access Protection surface to apply to the period between 14 April and 31 August. This option will apply to six additional land parcels on the western side of the surface.
- Extend coverage of the Sun Access Protection surface to apply to either the period covered by the autumn to spring equinoxes (i.e. 21 March to 23 September) or year-round. The number of land parcels affected by both these periods are the same, but the proportion of the land parcels on the extremities would have more land subject to the surface. Land parcels on the eastern side of the Parramatta Square surface beyond the 12-noon on 21 June portion of the surface will be more adversely affected by the existing Lancer Barracks surface than Parramatta Square.

It is recommended that the currently adopted position of protecting sunlight access to Parramatta Square between 12-noon and 2pm on 21 June (mid-winter) is maintained for the purposes of addressing Condition 1(j)(iv) of the Gateway Determination. This option derives the greatest benefit to amenity within the Parramatta Square protected area for mid-winter, with additional periods of the year deriving incremental improvements for other periods of the year when parts of the Parramatta Square protected area may have shadows cast by buildings. Building heights to the east of the Parramatta Square protected area are already limited in height due to the Sun Access Protection Surface for Lancer Barracks.

A basic analysis of impacts from the minor incursions for overshadowing to the Parramatta Square Protected Area proposed in the insertion of Clause 7.4(5) are considered minor; and are unlikely to result in cumulative adverse impacts to the amenity of Parramatta Square being sought to be protected by the principal overshadowing clause.

This position is taken on the basis of the physical characteristics of the elements identified for exception in the subclause, which may have a very narrow horizontal profile or are located at ground level or are of a

scale that will have localised impacts but not compromise the amenity of the Protected Area generally.

It is recommended that the exceptions to the additional overshadowing of the Parramatta Square Protected Area as specified at proposed Clause 7.4(5) are adopted to enable minor incidences of additional overshadowing to the Protected Area by limited building and public domain elements. This subclause will make an allowance for minor additional overshadowing cast by elements of buildings and public domain that will not result in compromises to the overall amenity sought in terms of providing sunlight access for Parramatta Square generally.

In order to address Condition 1(o) of the altered Gateway Determination of 27 July 2020, it is further recommended that an additional control is applied to ensure development on land that is outside the Sun Access Protection Surface for Parramatta Square, but could under the proposed controls for the Parramatta CBD Planning Proposal create overshadowing after 1pm on the equinoxes is further tested to ensure any such overshadowing of the Parramatta Square Protected Area is mitigated by a compensatory area of publicly accessible land *outside* the Protected Area remaining in sunlight equivalent to the amount of overshadowing *inside* the Protected Area.



# 6. Assessing Cumulative Overshadowing of Heritage Conservation Areas

## 6.1. Introduction

This section of the Technical Paper sets out the findings of analysis on the cumulative overshadowing of four nominated Heritage Conservation Areas situated to the south of the Parramatta CBD. This assessment is undertaken to address condition 1(k)(ii) - *Carry out an urban design study of the southern interface areas to ensure that excessive cumulative shadow impacts are not created across the northern sections of adjoining heritage conservation area (HCA), including the Harris Park [West] HCA, the Experiment Farm HCA, the Tottenham Street HCA and the South Parramatta HCA. These areas should receive a minimum of two hours' direct sunlight between 9am and 3pm at midwinter (21 June). If required, heights and FSRs are to be adjusted accordingly* – of the Gateway Determination.

Pursuant to feedback from a previous Councillor workshop, testing was also undertaken on the North Parramatta and Sorrell Street HCAs.

## 6.2. Analysis Method

Analysis for this task applies the Sun Shadow Volume geoprocessing tool to the extruded forms of current and proposed height controls, as set out in Sections 3.3 and 0 of this Technical Paper. Testing of overshadowing is undertaken between 9am and 3pm on 21 June (mid-winter) at 30-minute intervals. A comparison view between the shadows cast by the existing controls and the proposed CBD controls across this period is shown at Appendix 1 – Overshadowing of Heritage Conservation Areas.

## 6.3. Impact assessment of overshadowing on the Heritage Conservation Areas

The first pass of analysis indicates significant increases in overshadowing across the four southern HCAs; and minor increases in overshadowing across the two northern HCAs when comparing the overshadowing from current height controls in Parramatta LEP 2011 with those currently proposed in the CBD Planning Proposal, as set out in Table 7 and Table 8. In these tables, the average percentage is more representative of the impact *per se* as it shows the results of overshadowing over the entire six-hour period tested. The minimum and maximum values are useful as references to the upper and lower bounds of the overshadowing at any one nominated period across the day.

The second phase of analysis assessed impacts at a land parcel level to determine whether a land parcel could meet the minimum two-hour threshold of sunlight access between 9am and 3pm on 21 June as set out in the Gateway condition. This more detailed second phase of testing only needed to be undertaken on the southern HCAs due to higher incentive height of building controls located in the CBD core and southern parts of the CBD. Land parcels in the North Parramatta and Sorrell Street HCAs could meet the minimum two-hour threshold for sunlight access between 9am and 3pm on 21 June due to the generally lower incentive height of building controls north of the river combined with their location at the northern fringes of the CBD planning proposal area, which were not as impacted by shadows being cast.

| Heritage Conservation Area | Minimum % of overshadowing | Maximum % of overshadowing | Average % of overshadowing |
|----------------------------|----------------------------|----------------------------|----------------------------|
| South Parramatta           | 0.0%                       | 1.76%                      | 0.23%                      |
| Tottenham Street           | 0.0%                       | 10.98%                     | 2.32%                      |
| Harris Park West           | 13.17%                     | 45.76%                     | 18.30%                     |
| Experiment Farm            | 0.0%                       | 5.84%                      | 0.99%                      |
| North Parramatta           | 19.96%                     | 29.23%                     | 21.78%                     |
| Sorrell Street             | 22.52%                     | 44.57%                     | 31.85%                     |

Table 7 - Minimum, Maximum and Average proportion of overshadowing to the Heritage Conservation Areas under current controls

| Heritage Conservation Area | Minimum % of overshadowing | Maximum % of overshadowing | Average % of overshadowing |
|----------------------------|----------------------------|----------------------------|----------------------------|
| South Parramatta           | 1.32%                      | 77.43%                     | 17.96%                     |
| Tottenham Street           | 4.32%                      | 100.00%                    | 56.74%                     |
| Harris Park West           | 21.69%                     | 91.50%                     | 63.09%                     |
| Experiment Farm            | 0.00%                      | 90.16%                     | 17.07%                     |
| North Parramatta           | 20.48%                     | 59.19%                     | 27.77%                     |
| Sorrell Street             | 29.85%                     | 70.70%                     | 43.47%                     |

Table 8 - Minimum, Maximum and Average proportion of overshadowing to the Heritage Conservation Areas under CBD Planning Proposal controls

Results for the parcel-based analysis of overshadowing to the southern HCAs to test indicates a significant increase in the number of parcels that cannot achieve two hours of sunlight access between 9am and 3pm on 21 June under the CBD Planning Proposal controls as currently endorsed. Land parcels within the Harris Park West and Tottenham Street conservation areas are particularly impacted due to the significant change in height controls between the current Height of Buildings within Parramatta LEP 2011 and the Incentive Height of Buildings of the CBD Planning Proposal. The results of the overshadowing assessment at a parcel level are set out in Table 9 and Table 10 and illustrated in Figure 36. Those parcels that are overshadowed or not overshadowed across the six-hour period of 21 June are illustrated in Appendix 2 – Parcel-based Assessment of Overshadowing of Heritage Conservation Areas.

| Heritage Conservation Area   | Number of Parcels | Parcels with less than 2 hours sunlight access | Parcels with 2 hours or more of sunlight access |
|------------------------------|-------------------|--|---|
| South Parramatta             | 166               | 0 (0%)   | 166 (100%)                                      |
| Tottenham Street             | 14                | 2 (14.3%)                                      | 12 (85.7%)                                      |
| Harris Park West             | 184               | 24 (13%)                                       | 160 (87%)                                       |
| Experiment Farm              | 121               | 0 (0%)   | 121 (100%)                                      |
| <b>Total across all HCAs</b> | <b>485</b>        | <b>26 (5.4%)</b>                               | <b>459 (94.6%)</b>                              |

Table 9 - Comparison of land parcels achieving two hours or more of sunlight access between 9am and 3pm on 21 June under current Height of Buildings controls within Parramatta Local Environmental Plan 2011

| Heritage Conservation Area   | Number of Parcels | Parcels with less than 2 hours sunlight access |                | Parcels with 2 hours or more of sunlight access |                |
|------------------------------|-------------------|--|----------------|---|----------------|
| South Parramatta             | 166               | 16   | (9.6%)         | 150   | (90.4%)        |
| Tottenham Street             | 14                | 9  | (64.3%)        | 5   | (35.7%)        |
| Harris Park West             | 184               | 110  | (59.8%)        | 74  | (40.2%)        |
| Experiment Farm              | 121               | 0  | (0%)           | 121   | (100%)         |
| <b>Total across all HCAs</b> | <b>485</b>        | <b>135</b>                                     | <b>(27.8%)</b> | <b>350</b>                                      | <b>(72.2%)</b> |

Table 10 - Comparison of land parcels achieving two hours or more of sunlight access between 9am and 3pm on 21 June under proposed Incentive Height of Buildings controls within the CBD Planning Proposal

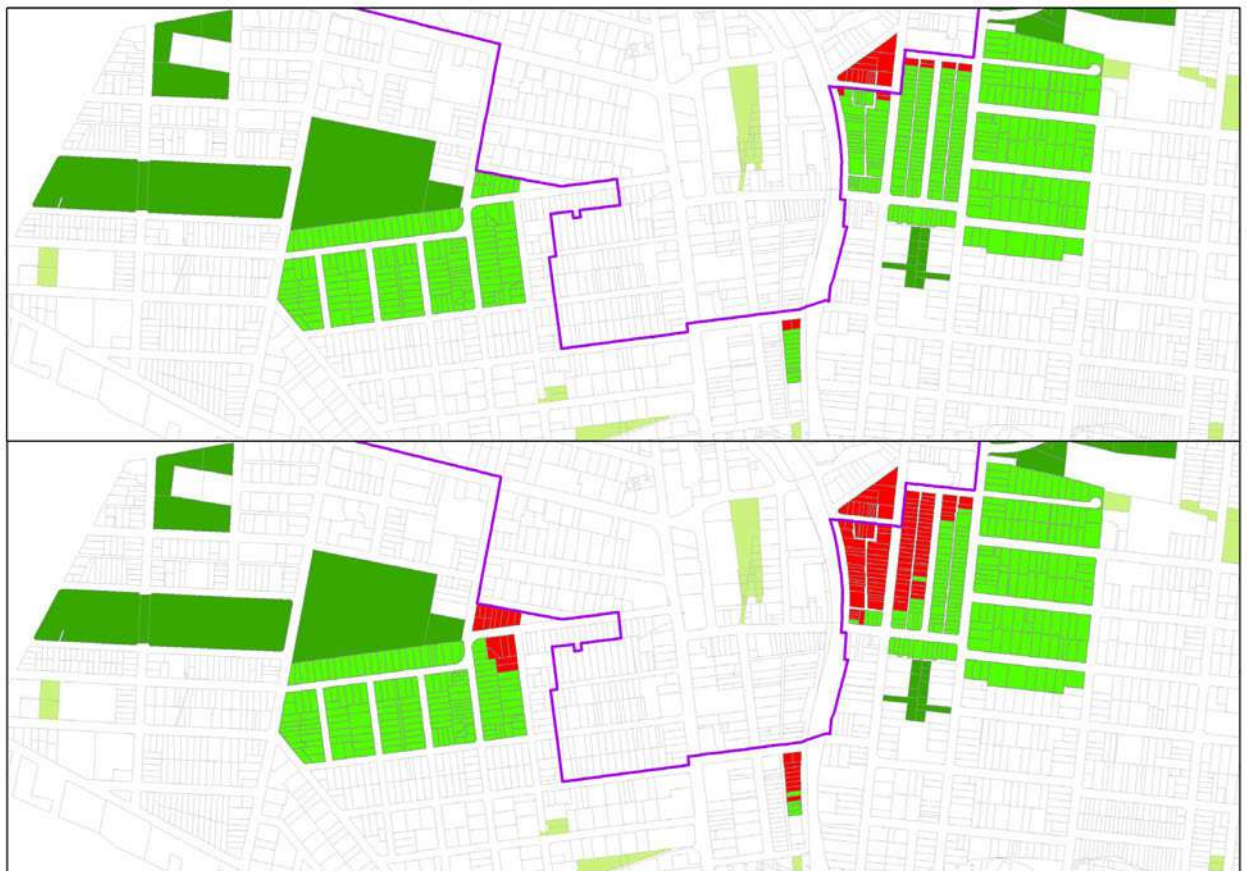


Figure 36 – Comparison of land parcels within the southern Heritage Conservation areas receiving 2 hours or more of sunlight (coloured light green) or not receiving 2 hours of sunlight (coloured red) between the current height controls under Parramatta Local Environmental Plan 2011 (top) and the proposed Incentive Height of Buildings controls for the CBD Planning Proposal (bottom)

Impacts on parcels within the South Parramatta HCA are primarily due to the potential overshadowing cast by the 243m (RL) Incentive Height of Buildings control on parcels along the Great Western Highway ridgeline. To a lesser extent, properties to the north-east with a 92m Incentive Height of Buildings control have an impact between 9am and 11am. Parcels which do not achieve two hours of sunlight access are in the north-eastern section of the HCA on Lansdowne and Lennox Streets.

Impacts on parcels within the Tottenham Street HCA are primarily due to the potential overshadowing cast by the 92m Incentive Height of Buildings control on parcels immediately to the north of the HCA. These controls start impacting the HCA from 10am; wholly cover the HCA between 11:30am and 2pm; before leaving late in the afternoon and being substituted by overshadowing from Incentive Height of Buildings controls along Church Street between 2pm and 3pm.

Impacts on parcels within the Harris Park West HCA are attributable to proposed 243m (RL) Incentive Height of Buildings controls located to the north-east and north-west of the HCA – within the blocks bounded by Harris Street, Hassall Street, Station Street East and Parkes Street. These controls start impacting the western edge in the morning before substantially covering the HCA from 10am right through to 3pm. Some 243m (RL) Incentive Height of Buildings controls from around Valentine Street impact the western edge of the HCA from 2pm to 3pm.

Impacts on parcels within the Experiment Farm HCA are mainly attributable to the same Incentive Height of Buildings controls impacting the Harris Park West HCA. The impacts from these controls starts around 12:30pm and continues through the afternoon. This HCA is not impacted by overshadowing in the morning.

#### **6.4. Managing the Impacts of overshadowing on the Heritage Conservation Areas**

The Gateway Determination condition also requires that if parcels within the HCAs cannot achieve the requisite two hours of sunlight access between 9am and 3pm on 21 June, consideration should be given to adjusting height controls and corresponding FSR controls to enable two hours of sunlight access to parcels within the HCAs.

To undertake this assessment, any blocks that had Incentive Height of Buildings controls which resulted in overshadowing of parcels within an HCA were identified and were subject to further testing to ascertain what reductions would be necessary to completely remove overshadowing from the HCAs. This assessment was undertaken on 28 blocks and the extent of any changes required to the Incentive Height of Buildings control are shown on Figure 37.

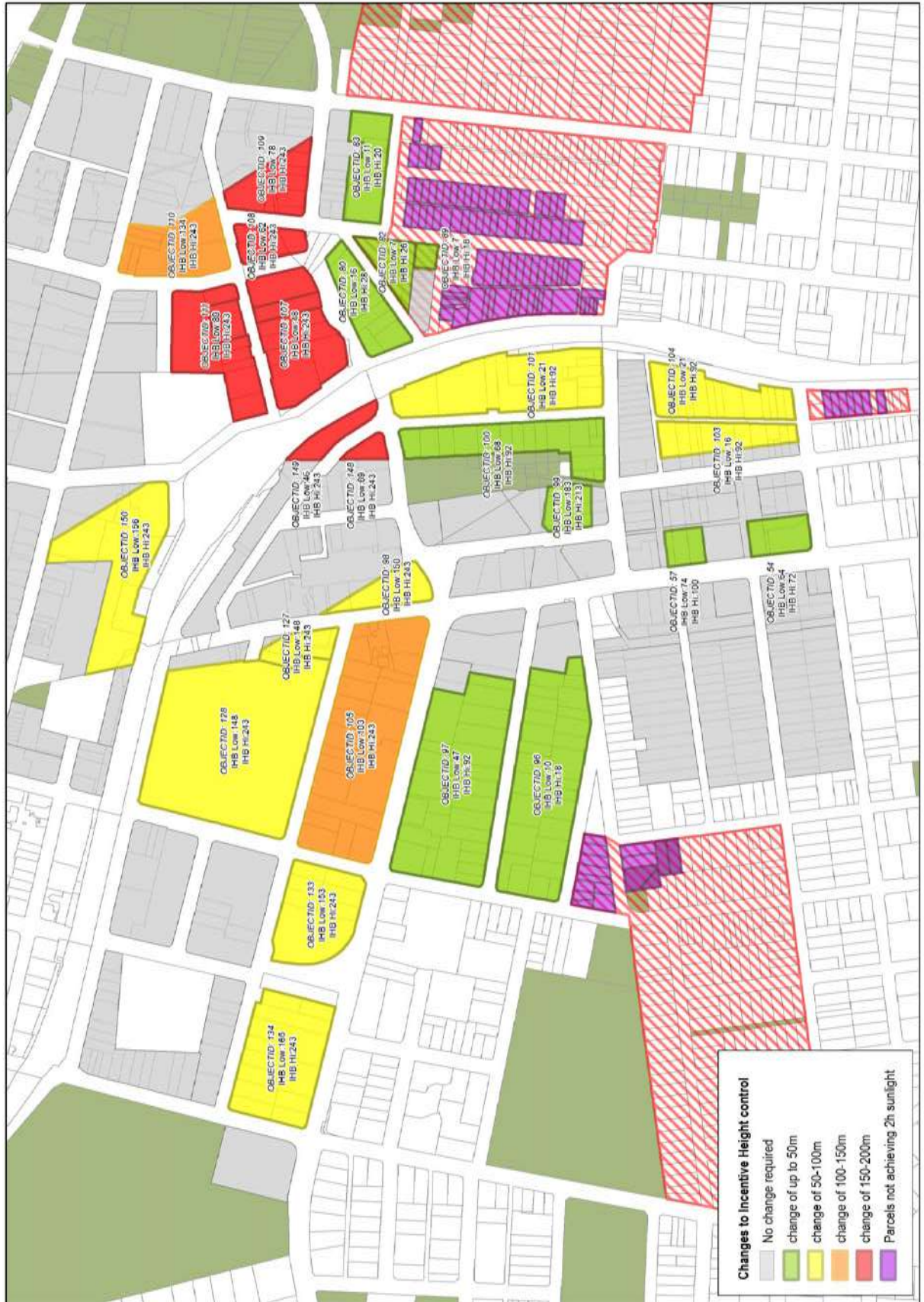


Figure 37 - Blocks identified for review and the extent of changes to the Incentive Height of Buildings control to completely remove overshadowing from HCAs

These 28 blocks were then further interrogated based on three principles to identify those where changes to the Incentive Height of Buildings control could be reasonably accommodated. These principles were:

- To minimise the overall loss of development yield. Revised heights must not be lower than current height controls; and
- To consider the existing development and the likelihood of future change within the block; and
- To consider where a change may result in multiple benefits – i.e. a reduction in height may benefit both land within the HCA and open space areas surrounding the CBD (as per the separate Gateway Determination condition and discussed in Section 7 of this paper).

When considering these three principles, 11 blocks were specifically found to be suitable for modifications to the Incentive Height of Buildings control. It should be noted that corresponding changes to the Incentive Floor Space Ratio control will also be undertaken to ensure both controls are consistent. The 11 blocks identified for change are shown in Figure 38.

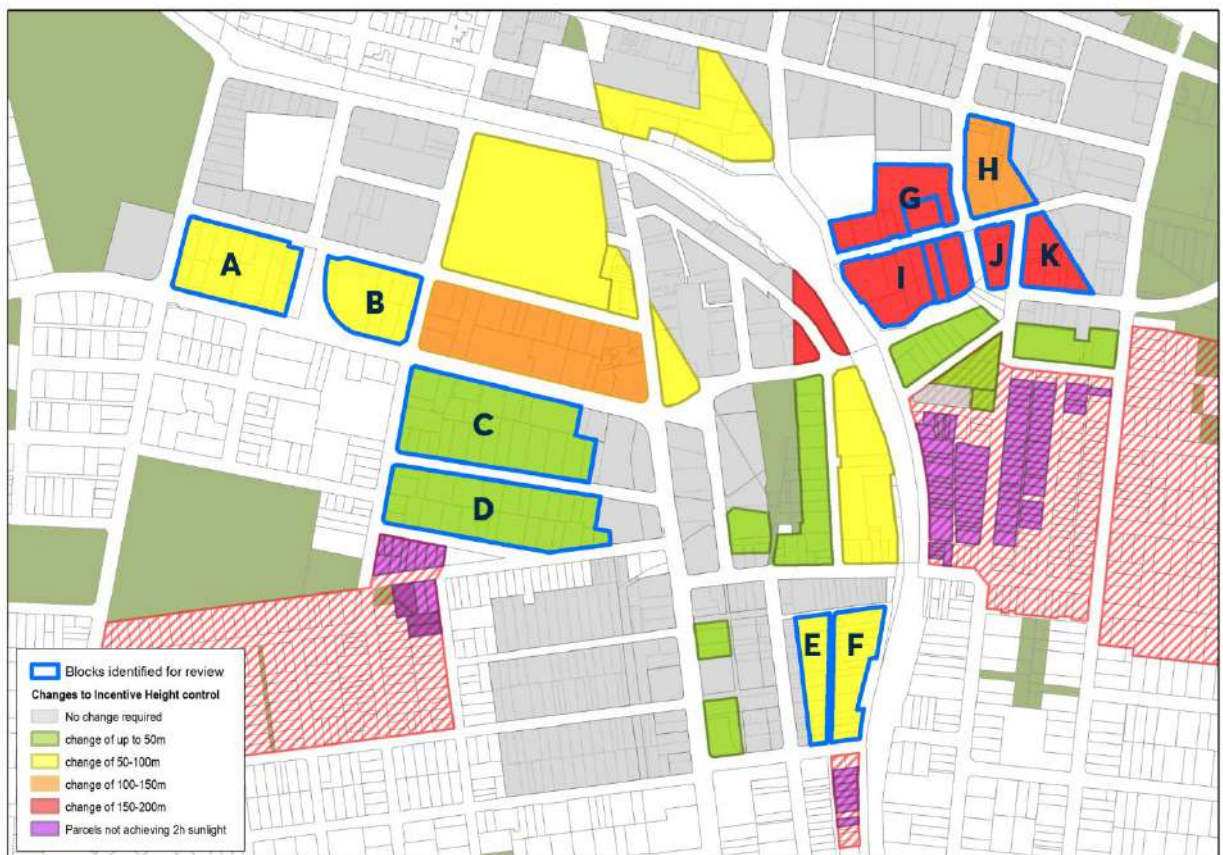


Figure 38 - Blocks identified for specific alteration to the Incentive Height of Buildings control.

An assessment of the characteristics and the recommended changes for each block is set out in Appendix 3 – Block Assessments. The summary of the recommended changes is set out in Table 11.

| Block   | LEP 2011 Current Height control  | CBD Planning Proposal Incentive HOB control                   | Revised CBD Planning Proposal Incentive HOB control   |
|---|--|---|---|
| <b>Blocks A-B</b>   | 28m  | 243m (RL) (NHC)   | 100m  |
| <b>Blocks C-D</b>   | Block C — 11m<br>Block D — Pt 11m, Pt 12m  | Block C — 92m (NHC)<br>Block D — Pt 20m, Pt 26m, Pt 92m (NHC) | Block C — 49m<br>Block D — Pt 11m, Pt 12m   |
| <b>Blocks E-F</b>   | 12m  | Block E — Pt 12m, Pt 92m (NHC)<br>Block F — 92m (NHC)         | Block E — Pt 12m, Pt 54m<br>Block F — 20m   |
| <b>Blocks G-K</b>   | Block G — 72m<br><br>Block H — Pt 72m, Pt 91.3m<br><br>Block I — Pt 72m, Pt 130m<br><br>Block J — 72m<br><br>Block K — 54m | 243m (RL) (NHC)   | Block G — Pt 90m, Pt 192m<br><br>Block H — 167m<br><br>Block I — Pt 72m, Pt 130m<br><br>Block J — 80m<br><br>Block K — 130m |
| (NHC) – No Height Control. Refer to Section 3.2 for the discussion on how heights are applied to areas with no incentive height of buildings control. |  |   |   |

Table 11 - Summary of current Height of Buildings, Incentive Height of Buildings controls and proposed revisions to the Incentive Height of Buildings control

A summary of the benefits of the changes in terms of reducing overshadowing on heritage conservation areas and, consequentially, open space areas outside the CBD are set out in Table 12.

| Block             | Summary of benefits arising from the changes  |
|-------------------|---|
| <b>Blocks A-B</b> | <ul style="list-style-type: none"> <li>• Overshadowing significantly reduced to South Parramatta HCA</li> <li>• Overshadowing removed from Jones Park and Ollie Webb Reserve</li> </ul>         |
| <b>Blocks C-D</b> | <ul style="list-style-type: none"> <li>• Overshadowing significantly reduced to South Parramatta HCA</li> <li>• Morning overshadowing removed from Jones Park and Ollie Webb Reserve</li> </ul> |
| <b>Blocks E-F</b> | <ul style="list-style-type: none"> <li>• Overshadowing significantly reduced to Tottenham Street HCA, particularly in the middle of the day.</li> </ul>   |
| <b>Blocks G-K</b> | <ul style="list-style-type: none"> <li>• Overshadowing significantly reduced to Harris Park West HCA and Experiment Farm HCA</li> </ul>   |

Table 12 - Summary of the benefits from revisions to the Incentive Height of Buildings controls

The proposed changes to these blocks significantly reduce the average overshadowing across the six-hour period between 9am and 3pm on 21 June. While the changes do not entirely remove the overshadowing back to levels under the current LEP controls, significant improvements to amenity within the HCAs will be possible with the proposed changes. The number of land parcels that would not receive two hours of sunlight between 9am and 3pm increased from 26 under current controls to 135 under the CBD Planning Proposal controls. The revisions to the Incentive Height of Buildings control reduces that back to 53 parcels, mainly in the Harris Park West HCA. A comparison between the number of parcels

achieving two hours of sunlight access between 9am and 3pm on 21 June under the Incentive Height of Buildings control and the proposed revisions to controls are set out in Table 13 and Table 14 and illustrated on Figure 39. Detailed maps showing the comparison between the Incentive Height of Buildings control and the revisions to the Incentive Height of Buildings control is set out in Appendix 4 – Parcel-based Assessment of Overshadowing of Heritage Conservation Areas with revised Incentive Height of Buildings controls.

| Heritage Conservation Area   | Number of Parcels | Parcels with less than 2 hours sunlight access |                | Parcels with 2 hours or more of sunlight access |                |
|------------------------------|-------------------|--|----------------|---|----------------|
| South Parramatta             | 166               | 16   | (9.6%)         | 150   | (90.4%)        |
| Tottenham Street             | 14                | 9  | (64.3%)        | 5   | (35.7%)        |
| Harris Park West             | 184               | 110  | (59.8%)        | 74  | (40.2%)        |
| Experiment Farm              | 121               | 0  | (0%)           | 121   | (100%)         |
| <b>Total across all HCAs</b> | <b>485</b>        | <b>135</b>                                     | <b>(27.8%)</b> | <b>350</b>                                      | <b>(72.2%)</b> |

Table 13 - Comparison of land parcels achieving two hours or more of sunlight access between 9am and 3pm on 21 June under proposed Incentive Height of Buildings controls within the CBD Planning Proposal

| Heritage Conservation Area   | Number of Parcels | Parcels with less than 2 hours sunlight access |                | Parcels with 2 hours or more of sunlight access |                |
|------------------------------|-------------------|--|----------------|---|----------------|
| South Parramatta             | 166               | 4  | (2.4%)         | 162   | (97.6%)        |
| Tottenham Street             | 14                | 2  | (14.3%)        | 12  | (85.7%)        |
| Harris Park West             | 184               | 47   | (25.5%)        | 137   | (74.5%)        |
| Experiment Farm              | 121               | 0  | (0%)           | 121   | (100%)         |
| <b>Total across all HCAs</b> | <b>485</b>        | <b>53</b>                                      | <b>(10.9%)</b> | <b>432</b>                                      | <b>(89.1%)</b> |

Table 14 - Comparison of land parcels achieving two hours or more of sunlight access between 9am and 3pm on 21 June under revisions to the Incentive Height of Buildings controls within the CBD Planning Proposal



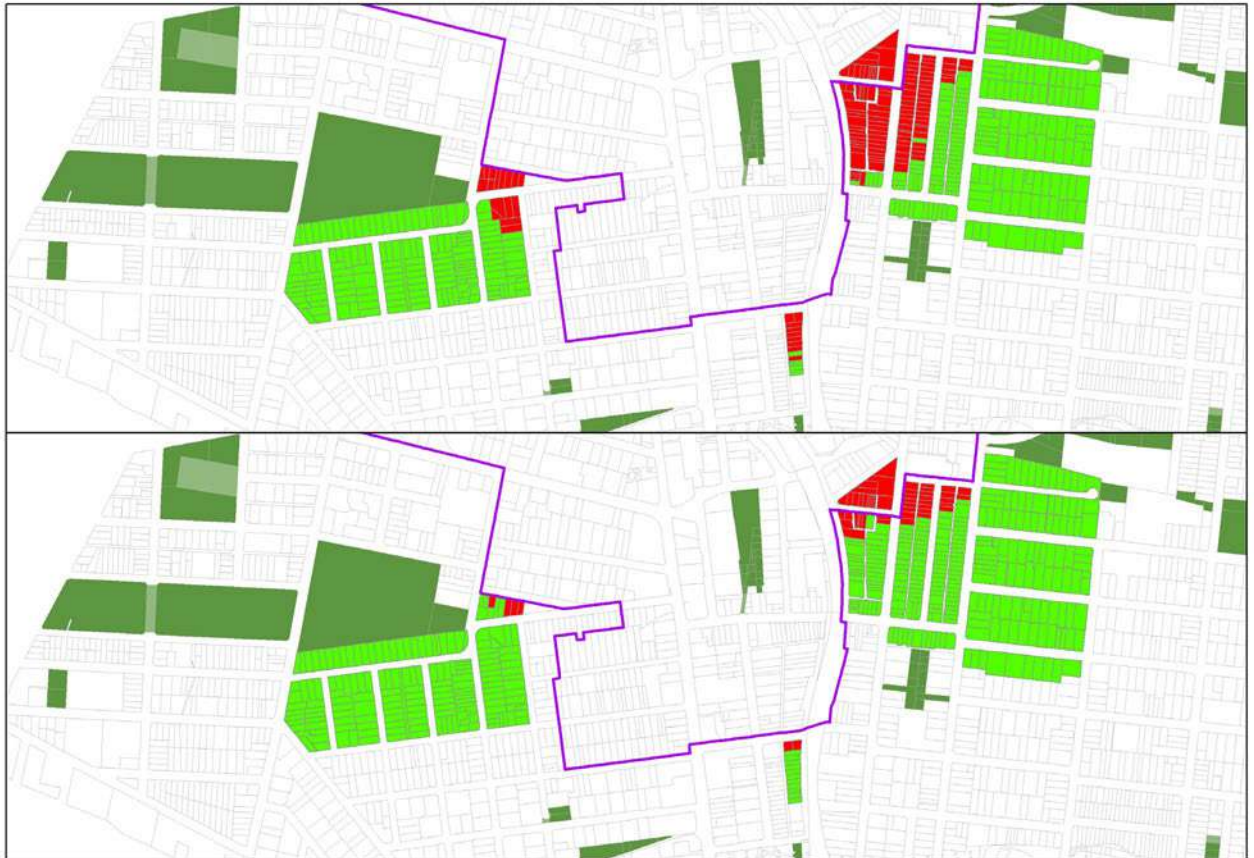


Figure 39 - Comparison of land parcels within the southern Heritage Conservation areas receiving 2 hours or more of sunlight (coloured light green) or not receiving 2 hours of sunlight (coloured red) between the proposed Incentive Height of Buildings controls under the CBD Planning Proposal (top) and proposed revisions to the Incentive Height of Buildings control to address the Gateway condition (bottom)

## 6.5. Conclusions and Recommendation

The findings of the analysis for this condition identified significant adverse impacts to surrounding land parcels within the four heritage conservation areas to the south of the CBD resulting from overshadowing from the Incentive Height of Buildings controls within the CBD Planning Proposal. The proposed revisions to the 11 blocks identified in Section 6.4 of this paper would reduce the extent of the adverse impacts from overshadowing on the surrounding areas. The changes will also still enable degrees of uplift for future development where it could be realistically accommodated.

It is recommended that the changes set out in this section of the technical paper are considered for adoption to amend the Incentive Height of Buildings controls within the CBD Planning Proposal. Consequential changes to Incentive Floor Space Ratio controls to align those controls with the amended Incentive Height of Buildings controls will be necessary. Principles that will inform the determination of any revised Incentive Floor Space Ratio control includes:

- Where a revised Incentive Height of Buildings control is consistent with an equivalent Incentive Height of Buildings control elsewhere in the CBD Planning Proposal, the corresponding Incentive Floor Space Ratio control would be applied; or
- Where a revised Incentive Height of Buildings control is consistent with an equivalent Height of Buildings control under the current Parramatta LEP 2011, the corresponding Floor Space Ratio control would be applied; or
- In any other circumstances, undertaking urban design analysis to determine an Incentive Floor Space Ratio control that will be consistent with the revised Incentive Height of Buildings control.

# 7. Assessing Cumulative Overshadowing of Open Space Areas outside the Parramatta CBD

## 7.1. Introduction

This section of the Technical Paper sets out the findings of testing for overshadowing from existing and proposed planning controls on open space areas surrounding the Parramatta CBD. This assessment is undertaken to address condition 1(j)(ii) — *Provide further assessment of the overshadowing impact of the proposed controls on public open spaces surrounding the CBD compared to the existing controls* — of the Gateway Determination.

Providing quality open space has an important role in urban development and the amenity of the urban environment. With the significant growth that could be accommodated under the Parramatta CBD Planning Proposal, there is a need to ensure that adverse impacts on open space areas that are reasonably accessible from the Parramatta CBD – such as overshadowing – can be avoided or minimised as far as practicable.

Opportunities to increase the physical supply of open space within or around the Parramatta CBD are very limited – and potentially very costly to acquire if land is already used for residential or commercial development. Combined with high density residential development in and around the CBD, the existing open space areas have an additional role as *de facto* back yards where residents without private open space in their apartments can use the space for passive recreational activities. Limited opportunities for some dedication or provision of land for open space may be negotiated with individual developers, however the quantities of these spaces would be small and functionally limited to passive open space. Opportunities for larger areas of open space capable of providing additional sportsfields or larger organised play areas would be extremely difficult to realise. Consequently, the *existing* open space areas need to be protected as far as practicable to ensure their continued efficient use for an increasing residential and workforce population. This includes ensuring sunlight access to the grassed surfaces and playing fields as pressures for organised sport opportunities grow through greater involvement by more people. Conversion of turfed surface to synthetic playing fields should only be considered as a last resort due to significant installation and maintenance costs. In any event, conversions can be difficult in parts of Parramatta due to Aboriginal and colonial archaeology that may be below the surface and impact some open space areas such as Robin Thomas Reserve.

Public open spaces surrounding the Parramatta CBD range in size and function from small neighbourhood parks with limited amenities (e.g. Rosella Park or Noller Park) to large sportsfields (e.g. Robin Thomas Reserve or Ollie Webb Reserve) which host organised sport and local sporting competitions. Other notable open space areas serve a curtilage function to significant heritage items (e.g. Hambledon Cottage Reserve or Experiment Farm Reserve). Parramatta Park, to the west of the CBD, has a regional/metropolitan function and has multiple items of local, state, and world-heritage significance. Part of Parramatta Park has been identified for the potential location of the new Parramatta aquatic centre, which is anticipated to include both indoor and outdoor aquatic facilities.

## 7.2. Identifying the Open Space Areas

Ten (10) open space areas were identified for testing the impacts of overshadowing from the current and proposed planning controls. These open space areas are generally located to the south-east and south-west of the CBD. These open space areas were selected based on potential impacts of overshadowing from particularly tall height of buildings controls in the CBD core where heights of up to 243m (RL) are proposed. Areas north of the Parramatta River generally have a maximum height of 92m with edges of the CBD interfacing the surrounding residential areas having lower heights with no impacts on open space areas surrounding the CBD anticipated due to the lower heights and orientation of the parks mainly to the north and east of the CBD. Accordingly, the open space areas identified for testing are set out in Table 15 and shown in Figure 40.

Criteria from the Greater Sydney Commission's audit into open space areas and consultation with Council's Recreation and Open Space teams have established some functional criteria for each open space area. Descriptions of the criteria are as follows:

- Active Open Space – is land set aside for the primary purpose of formal outdoor sports for the community. Active open space supports team sports, training and competition; and typically features sports facilities such as playing fields, change rooms, grandstands and car parks.
- Passive Open Space – is land set aside for parks, gardens, linear corridors, conservation bushland and nature reserves. These areas are made available for passive recreation, play and unstructured physical activities.
- Water Play Facilities – offers water-based activities during the warmer months of the year (e.g. between September and May). Water parks can be located within active or passive open spaces.
- Regional Level – is open space of city-wide or metropolitan significance.
- District Level – is open space of significance to multiple neighbourhoods that may extend beyond the LGA boundary.
- Local Level – is open space significant to single neighbourhoods; and are located within or near residential areas.

## 7.3. Analysis Method

Analysis for this task applies the Sun Shadow Volume geoprocessing tool to the extruded forms of current and proposed height controls, as set out in Sections 3.3 and 0 of this Technical Paper. Testing of overshadowing is undertaken between 9am and 3pm on 21 June (mid-winter) at 30-minute intervals. A comparison view between the shadows cast by the existing controls and the proposed CBD controls across this period is shown at Appendix 5 – Overshadowing of Public Open Space areas.

| Park                      | Open Space Category |          |       |              |          |       |            |
|---------------------------|---------------------|----------|-------|--------------|----------|-------|------------|
|                           | Active Uses         |          |       | Passive Uses |          |       |            |
|                           | Regional            | District | Local | Regional     | District | Local | Water Play |
| Noller Park               |                     |          |       |              |          | ✓     |            |
| Ollie Webb Reserve        |                     | ✓        |       |              | ✓        |       |            |
| Parramatta Park           |                     |          |       | ✓            |          |       | ✓          |
| Mays Hill Reserve         |                     |          |       |              |          | ✓     |            |
| Jones Park                |                     | ✓        |       |              |          | ✓     |            |
| Robin Thomas Reserve      |                     | ✓        |       |              | ✓        |       |            |
| James Ruse Reserve        |                     |          |       |              | ✓        |       | ✓          |
| Experiment Farm Reserve   |                     |          |       |              |          | ✓     |            |
| Hambledon Cottage Reserve |                     |          |       |              |          | ✓     |            |
| Rosella Park, Harris Park |                     |          |       |              |          | ✓     |            |

Table 15 - Open Space areas selected for testing

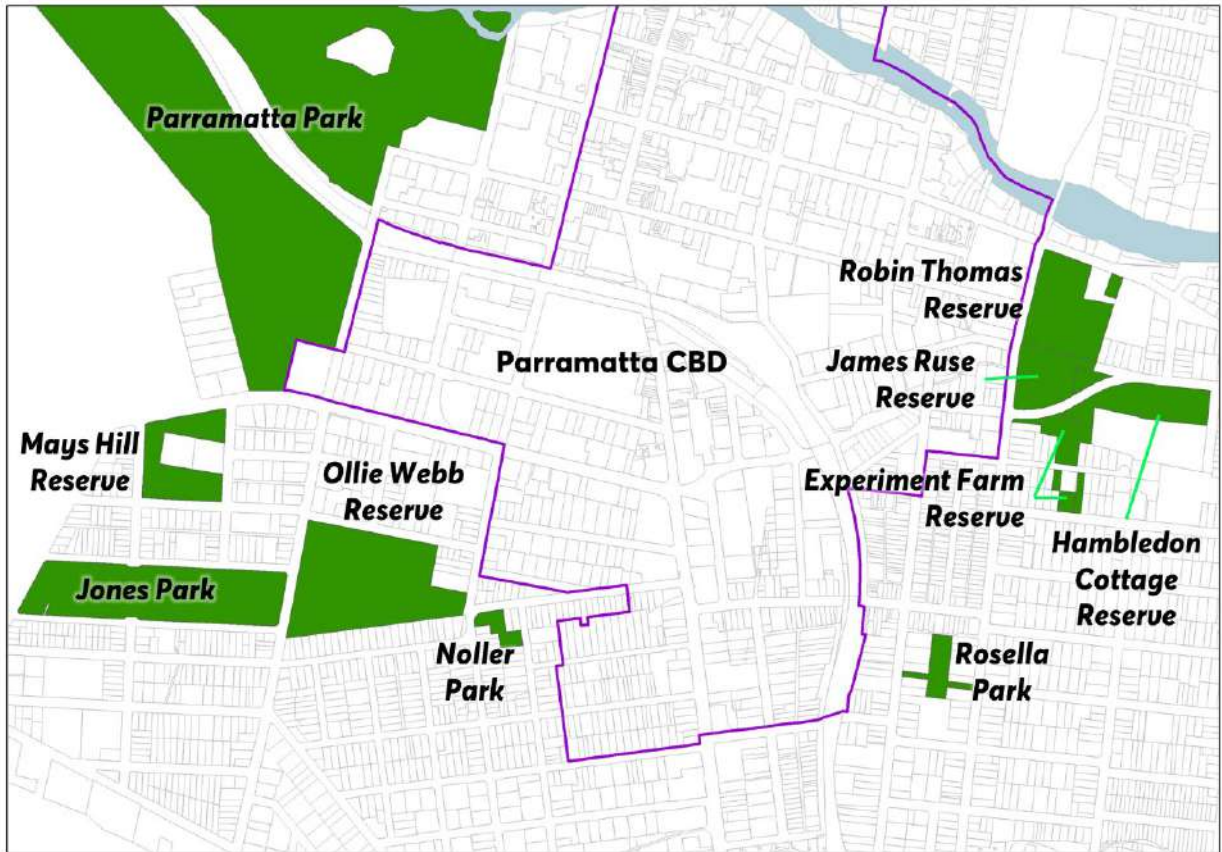


Figure 40 - Open Space Areas selected for testing

#### 7.4. Impact assessment of overshadowing on open space areas

Initial impact assessment of overshadowing applied a threshold for the provision of public open space from the City of Sydney in the absence of any criteria specified in the Gateway Determination. Using the test from *Sydney Development Control Plan 2012* (Clause 3.1.4), a threshold requiring a minimum of 50% of a park's area is to receive four hours or more of sunlight between 9am and 3pm on 21 June.

Using this criteria, all ten parks achieved the minimum threshold of four hours of sunlight between 9am and 3pm on 21 June under current controls; while seven of the ten achieved the threshold under the endorsed CBD Planning Proposal controls. Noller Park achieved about 2 hours of sunlight between 1pm and 3pm (a reduction of 67% from the current controls); James Ruse Reserve received about 3 hours of sunlight between 9am and 12-noon (a reduction of 33% from the current controls); and Ollie Webb Reserve received about 3.5 hours of sunlight between 11:30am and 3:00pm (a reduction of nearly 50% from current controls).

A summary of the hours of sunlight received by the various parks; and the minimum, maximum and average proportion of overshadowing between 9am and 3pm is set out in Table 16 and Table 17, below.

Internal consultation with Council's Open Space and Recreation teams recommended different degrees of protection for open spaces based on their use and functions. For open spaces that are primarily passive use the four-hour standard from the City of Sydney's Development Control Plan is a reasonable threshold. For open spaces that have sportsfields and are in regular use for organised and competition sports, the amount of sunlight access should be maximised as far as practicable. This will enable the grass and turf surfaces to recover and regenerate from use. With increasing pressure on the sportsfields to accommodate more competition events from a growing population and interest in sports such as soccer, the capability of sportsfields that cannot recover and regenerate because of insufficient sunlight caused by overshadowing from surrounding development will reduce the availability of those sportsfields; and will require competition events to be relocated elsewhere.

| Park                      | Hours of sunlight received | Minimum % of overshadowing | Maximum % of overshadowing | Average % of overshadowing |
|---------------------------|----------------------------|----------------------------|----------------------------|----------------------------|
| Noller Park               | 6                          | 0.0%                       | 6.2%                       | 0.5%                       |
| Ollie Webb Reserve        | 6                          | 0.0%                       | 0.0%                       | 0.0%                       |
| Parramatta Park           | 6                          | 0.0%                       | 0.3%                       | 0.0%                       |
| Mays Hill Reserve         | 6                          | 0.0%                       | 0.0%                       | 0.0%                       |
| Jones Park                | 6                          | 0.0%                       | 0.0%                       | 0.0%                       |
| Robin Thomas Reserve      | 5                          | 0.0%                       | 88.1%                      | 18.5%                      |
| James Ruse Reserve        | 4.5                        | 0.0%                       | 91.6%                      | 21.8%                      |
| Experiment Farm Reserve   | 6                          | 0.0%                       | 24.4%                      | 3.0%                       |
| Hambledon Cottage Reserve | 6                          | 0.0%                       | 18.0%                      | 1.8%                       |
| Rosella Park, Harris Park | 6                          | 0.0%                       | 0.0%                       | 0.0%                       |

Table 16 - Hours of sunlight received; Minimum, Maximum and Average proportion of overshadowing of open space under current height controls. Green boxes indicate 50% of the open space area receiving at least 4 hours of sunlight between 9am and 3pm.

| Park                      | Hours of sunlight received | Minimum % of overshadowing | Maximum % of overshadowing | Average % of overshadowing |
|---------------------------|----------------------------|----------------------------|----------------------------|----------------------------|
| Noller Park               | 2                          | 0.0%                       | 100.0%                     | 61.0%                      |
| Ollie Webb Reserve        | 3.5                        | 0.0%                       | 100.0%                     | 42.5%                      |
| Parramatta Park           | 6                          | 0.0%                       | 0.5%                       | 0.1%                       |
| Mays Hill Reserve         | 6                          | 0.0%                       | 23.1%                      | 1.9%                       |
| Jones Park                | 5.5                        | 0.0%                       | 58.3%                      | 8.7%                       |
| Robin Thomas Reserve      | 4.5                        | 0.0%                       | 95.2%                      | 25.8%                      |
| James Ruse Reserve        | 3                          | 0.0%                       | 100.0%                     | 47.2%                      |
| Experiment Farm Reserve   | 5                          | 0.0%                       | 100.0%                     | 28.4%                      |
| Hambledon Cottage Reserve | 5                          | 0.0%                       | 97.1%                      | 19.0%                      |
| Rosella Park, Harris Park | 6                          | 0.0%                       | 33.0%                      | 4.6%                       |

Table 17 - Hours of sunlight received; Minimum, Maximum and Average proportion of overshadowing of open space under CBD Planning Proposal incentive height controls. Green boxes indicate 50% of each public open space area receiving at least 4 hours of sunlight between 9am and 3pm. Red boxes indicate 50% of each public open space area receiving less than 4 hours of sunlight.

## 7.5. Managing the Impacts of overshadowing on the Open Spaces

The Gateway Determination condition does not explicitly require amendments to be made to planning controls, unlike the condition pertaining to the impacts on heritage conservation areas. Several improvements to sunlight access to open spaces also resulted from the changes made to address overshadowing on heritage conservation areas (refer to Section 6 of this paper).

Two further blocks were identified for potential changes to the Incentive Height of Buildings controls. Both these blocks have site-specific planning proposals that either have been recently gazetted or are currently being assessed. These blocks are bounded by:

- (a) Macquarie Street, George Street, Harris Street and Argus Lane (the Cumberland Media and Albion Hotel block); and
- (b) Charles Street, George Street and the Parramatta River.

As both these blocks have or have had site-specific planning proposals running independently of the CBD Planning Proposal, the CBD Planning Proposal can be reasonably amended to be consistent with these separate proposals particularly if:

- (a) the planning proposal is well-progressed (as in the case of 142 Macquarie Street); or
- (b) the planning proposal is consistent with the controls sought by the site-specific planning proposal (as in the case of 135 George Street/118 Harris Street); or
- (c) the planning proposal has been recently gazetted (as in the case of 180 George Street and 184-188 George Street);

provided the results of testing indicate that the potential impacts of overshadowing could be reduced compared to impacts from the CBD Planning Proposal controls as endorsed on April 2016.

On those grounds, modifications to the Incentive Height of Buildings control were made to these blocks to reflect the heights sought by the site-specific planning proposals and a further iteration of shadow modelling was undertaken to ascertain any improvements. The results are set out in Table 18. Significant improvements are made to Noller Park and Ollie Webb Reserve where sunlight access is increased by 1.5 hours. Some other parks had modest improvements of 30 minutes, namely Jones Park, James Ruse Reserve and Hambledon Cottage Reserve. Remaining parks had no changes between the CBD planning proposal controls and the identified revisions to the Incentive Height of Buildings control.

| Park                      | Hours of sunlight received | Minimum % of overshadowing | Maximum % of overshadowing | Average % of overshadowing |
|---------------------------|----------------------------|----------------------------|----------------------------|----------------------------|
| Noller Park               | 3.5                        | 0.0%                       | 100.0%                     | 39.2%                      |
| Ollie Webb Reserve        | 5                          | 0.0%                       | 97.5%                      | 18.2%                      |
| Parramatta Park           | 6                          | 0.0%                       | 0.5%                       | 0.1%                       |
| Mays Hill Reserve         | 6                          | 0.0%                       | 23.1%                      | 1.9%                       |
| Jones Park                | 6                          | 0.0%                       | 18.0%                      | 1.4%                       |
| Robin Thomas Reserve      | 4.5                        | 0.0%                       | 95.2%                      | 25.8%                      |
| James Ruse Reserve        | 3.5                        | 0.0%                       | 100.0%                     | 39.1%                      |
| Experiment Farm Reserve   | 5                          | 0.0%                       | 100.0%                     | 19.6%                      |
| Hambledon Cottage Reserve | 5.5                        | 0.0%                       | 85.0%                      | 12.2%                      |
| Rosella Park, Harris Park | 6                          | 0.0%                       | 33.0%                      | 4.6%                       |

Table 18 - Hours of sunlight received; Minimum, Maximum and Average proportion of overshadowing of open space under revisions to the CBD Planning Proposal incentive height controls. Green boxes indicate 50% of each public open space area receiving at least 4 hours of sunlight between 9am and 3pm. Red boxes indicate 50% of each public open space area receiving less than 4 hours of sunlight.

## 7.6. Conclusions and Recommendation

The findings of the analysis for this condition identified significant adverse impacts to surrounding open space areas to the south of the CBD resulting from overshadowing from the Incentive Height of Buildings controls within the CBD Planning Proposal. The proposed revisions to the blocks identified in Section 6.4 and the two additional blocks identified in Section 7.5 of this paper would reduce the extent of the adverse impacts from overshadowing on the open spaces. The changes will also still enable degrees of uplift for future development where it could be realistically accommodated, or match outcomes already sought by site-specific planning proposals that are running or have run separate to the CBD Planning Proposal.

It is recommended that the following treatments are adopted for managing overshadowing to open space areas:

| Park   | Recommended Treatment   |
|--|---|
| <p><b><u>Passive Use Parks</u></b></p> <p>Noller Park</p> <p>Hambledon Cottage Reserve</p> <p>Experiment Farm Reserve</p> <p>Rosella Park</p> <p>Mays Hill Reserve</p> | <p>Minimum 4 hours sunlight access to 50% of the park's area between 9am and 3pm on 21 June on all parks, except:</p> <p>Noller Park – when considering its use as a small neighbourhood park adjoining a stormwater channel, 3.5 hours is acceptable.</p>  |
| <p><b><u>Active Use Parks</u></b></p> <p>Ollie Webb Reserve</p> <p>Jones Park</p>  | <p>Amend maximum heights within the CBD Planning Proposal consistent with the results of analysis undertaken for the Heritage Conservation Areas.</p>   |
| <p><b><u>Active Use Parks</u></b></p> <p>Robin Thomas Reserve</p> <p><b><u>Passive Use Parks</u></b></p> <p>James Ruse Reserve</p>                                     | <p>Amend maximum heights within the CBD Planning Proposal consistent with the site-specific planning proposals in the following blocks:</p> <p>(a) Macquarie Street, George Street, Harris Street and Argus Lane (the Cumberland Media and Albion Hotel block); and</p> <p>(b) Charles Street, George Street and the Parramatta River (180 George Street and 184-188 George Street site-specific planning proposals).</p> |
| <p><b>Parramatta Park</b></p>  | <p>Minimum 4 hours sunlight access between 9am and 3pm on 21 June</p>   |

Table 19 - Recommended treatments to manage overshadowing on public open space areas surrounding the Parramatta CBD



# 8. Further detailed testing

## 8.1. Introduction

This section of the Technical Paper re-tests the impacts of cumulative overshadowing on heritage conservation areas and open space areas surrounding the Parramatta CBD resulting from refined detailed testing in targeted areas.

Since the original published Technical Paper on 24 June, the model has gone through several iterations since. The series of iterations are set out in Table 20 below.

| Iterations | Modelling   |
|------------|---|
| 1          | Modelling of "current" controls within Parramatta LEP 2011  |
| 2          | Modelling of "proposed" controls under the Parramatta CBD Planning Proposal (as endorsed April 2016)  |
| 3          | Revision of "proposed" controls to reduce impacts on heritage conservation areas and open space areas around the CBD (June 24 version of the Technical Paper)   |
| 4 and 5    | Incorporation of detailed existing and proposed built-form modelling around the south-east parts of the CBD (Blocks G-K, L-M); including targeted testing at 5-7 Hassall Street, 14-20 Parkes Street and 190 George Street. |
| 6          | Incorporation of detailed built form modelling to the north of the Tottenham St Conservation Area (Blocks E-F)  |
| 7          | Further revisions to heights along the Great Western Highway ridgeline after detailed testing to Ollie Webb Reserve (Blocks A-D)  |

Table 20 - List of iterations for overshadowing testing

The original Technical Paper (24 June) covered iterations 1 to 3. This chapter will illustrate the results from iteration 7, which also incorporates the modelling modifications from iterations 4, 5 and 6.

The changes since iteration 3 are summarised as follows:

- Revisions to heights following detailed built form and urban design testing in Blocks E-M, covered in iterations 4-6
- Revisions to heights on Blocks A-D following refined testing using a Sun Access Protection surface modelled off Ollie Webb Reserve between 10am and 2pm on 21 June, covered in iteration 7.

The resulting 3D model is shown in Figure 41. A plan showing the blocks is included at Figure 42.

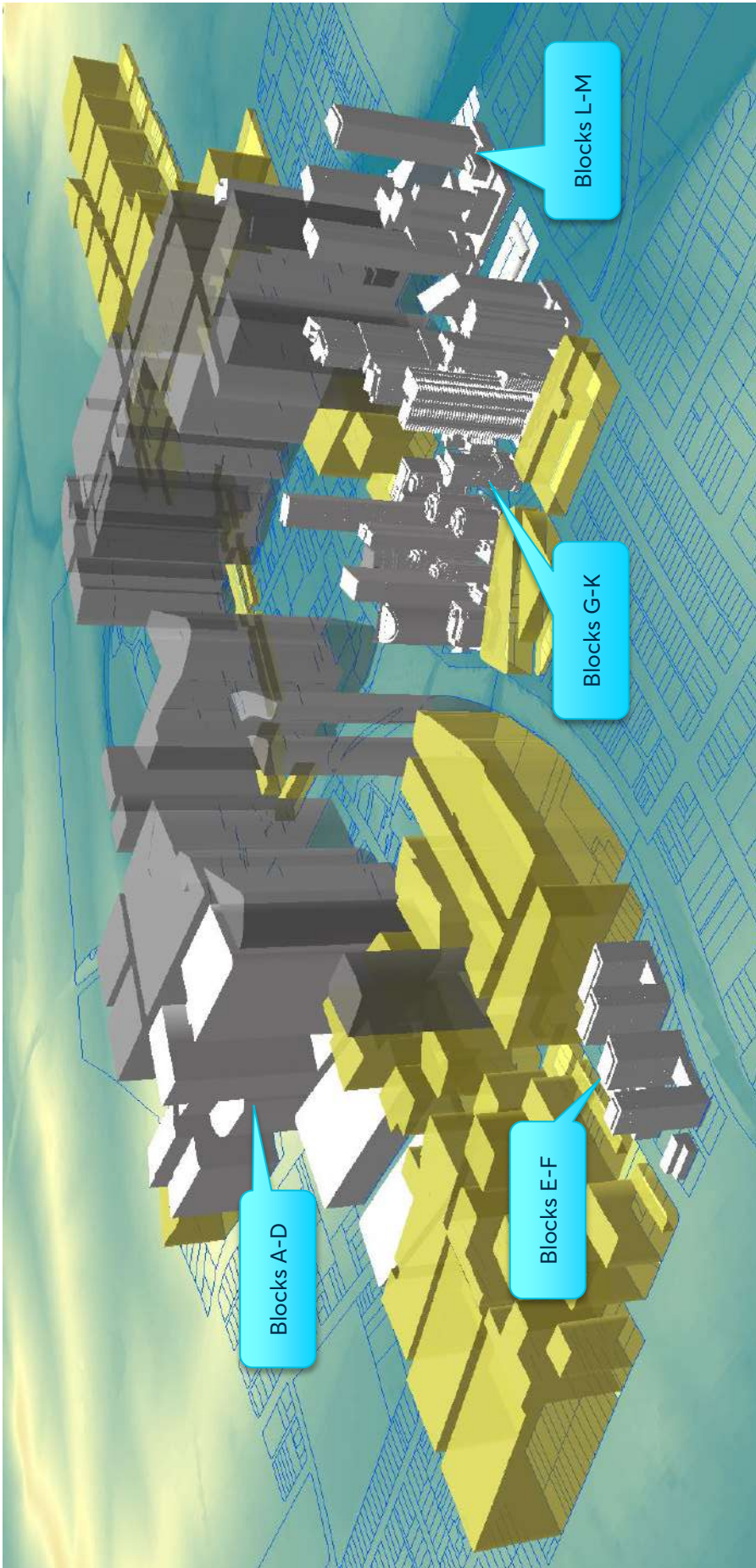


Figure 41 - Modified 3D model used for iteration 7

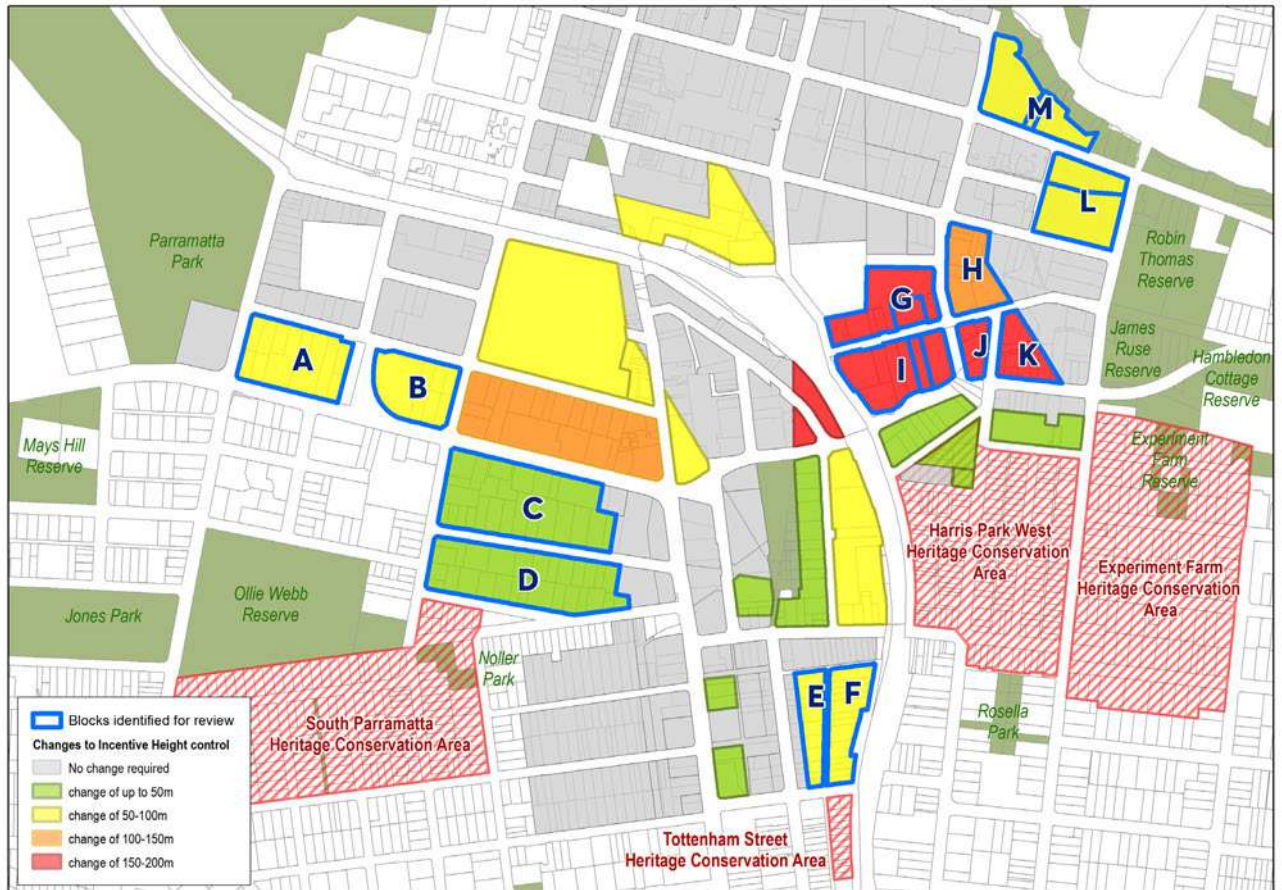


Figure 42 - Plan showing Blocks A to M

## 8.2. Refinements to height controls

Recommended heights for Blocks A-F, I and K as set out in Appendix 3 have been superseded by the analysis undertaken in this chapter. The further assessment does not recommend additional changes to Blocks G, H, J, L and M as set out in Sections 6 and 7 of this paper. Further refinements recommended to Blocks A to F, I and K are set out in Table 21, below.

| Block | CBD Planning Proposal Endorsed Incentive Height of Buildings (April 2016) | Recommended Revised Heights (June 2019) (Appendix 3)                | Revised Heights Tested (October 2019)   |
|-------|---|---|---|
| A     | No height control   | 100m above ground (existing) – includes 15% design excellence bonus | 115m above ground (existing) – includes 15% design excellence bonus                           |
| B     | No height control   | 100m above ground (existing) – includes 15% design excellence bonus | Part 115m and part 140m above ground (existing) – includes 15% design excellence bonus        |
| C     | No height control   | 49m above ground (existing) – includes 15% design excellence bonus  | To be excised from the CBD Planning Proposal and integrated into Southwest Investigation Area |

| Block | CBD Planning Proposal Endorsed Incentive Height of Buildings (April 2016) | Recommended Revised Heights (June 2019) (Appendix 3)   | Revised Heights Tested (October 2019)  |
|-------|---|--|--|
| D     | No height control   | 11m above ground (existing) – includes 15% design excellence bonus   | <i>To be excised from the CBD Planning Proposal and integrated into Southwest Investigation Area</i>   |
| E     | No height control   | Part 12m, part 54m above ground (existing) – includes 15% design excellence bonus                                | Part 14m and part 23m above ground (existing) – includes 15% design excellence bonus   |
| F     | No height control   | 20m above ground (existing) – includes 15% design excellence bonus   | 84m above ground (existing) – includes 15% design excellence bonus   |
| I     | No height control   | Maintain existing controls – Part 72m, Part 130m above ground (existing) – includes 15% design excellence bonus. | 140m above ground (existing) – includes 15% design excellence bonus – to 5-7 Hassall Street. Maintain existing controls – Part 72, Part 130m above ground (existing) – to remaining sites. |
| K     | No height control   | 130m above ground (existing) – includes 15% design excellence bonus  | 140m above ground (existing) – includes 15% design excellence bonus  |

Table 21 - Revised height controls from further testing

### 8.3. Analysis

The changes to Blocks A and B are considered reasonable after further testing with a Sun Access Protection surface created for the entire extent of Ollie Webb Reserve. This surface was prepared to apply to hours between 10am and 2pm on 21 June, consistent with that used at Experiment Farm. Revised height controls on Blocks A and B were modelled to avoid penetrating the surface during these hours. The 115m control applies to all land in Block A and land fronting the Great Western Highway in Block B. Changes in ground level elevation of approximately 10m between the Great Western Highway and Campbell Street combined with the continued slope of the Sun Access Protection Surface from Ollie Webb Reserve would enable an additional 25 metres (approximately) of height to development fronting Campbell Street.

Further testing for Blocks C and D did not result in changes to these blocks. Economic feasibility analysis was undertaken for these blocks to ascertain potential floor space ratios (and consequent height controls) needed to provide urban renewal in these blocks. With FSRs ranging between 5:1 and 10:1 required to facilitate turnover of properties in these blocks, the commensurate height controls that would have to be considered appropriate to accompany such FSRs would have significant adverse impacts on the South Parramatta Heritage Conservation Area and parts of Ollie Webb Reserve in the morning. Land immediately to the west of these blocks (generally bounded by Pitt Street, Glebe Street, Marsden Street and the Great Western Highway) was identified as an "Investigation Area" for potential CBD expansion in the Parramatta CBD Planning Strategy back in April 2015. Analysis into these "Investigation Areas" was deferred to enable the CBD Planning Proposal to progress in a timely manner. In order to avoid the CBD Planning Proposal from being held up while this particular issue was reconciled, excision of Blocks C and D from the CBD Planning Proposal to be considered jointly with the Southwest Investigation Area is considered a reasonable position.

Further testing for Blocks E and F indicated some refinements were possible with minor additional impact on the Tottenham Street Heritage Conservation Area. The revised testing resulted in one additional property (out of 14) being unable to receive two hours of sunlight between 9am and 3pm compared to the recommended heights from 24 June.

Further detailed testing for Block I identified one remaining potential development site at 5-7 Hassall Street which has a low-rise commercial office building on one site and an older three-storey residential flat building on the other. Other existing development within that block comprises high-rise apartments and larger commercial office buildings which are unlikely to change in the foreseeable future. To encourage an amalgamation of 5 and 7 Hassall Street, the sites combined have been identified as an "Opportunity Site" which would allow for a FSR of up to 15:1 and a height up to 192m above ground (existing), consistent with a site-specific planning proposal at 10-12 Hassall Street. The height of 192m was considered reasonable on the condition that 5 and 7 Hassall Street were amalgamated and any potential tower had sufficient inter-building separation from the apartments under construction at 9 Hassall Street as well as the existing commercial tower at 60 Station Street East. The overshadowing testing considered a maximum height of 140m (including the 15% design excellence bonus) which reflects a potential development at a 12:1 FSR. Additional height – of 52m – would be conditional on both sites amalgamating and being developed conjointly to improve the urban design outcome. A high level review of the overshadowing model indicates that this additional height may have marginal additional overshadowing impacts on the Harris Park West or Experiment Farm Heritage Conservation Areas in the late afternoon, particularly considering the tall tower proposed nearby at 10-12 Hassall Street.

Further testing for Block K took into account a site-specific planning proposal at 14-20 Parkes Street. The proposal had a design competition winning tower concept with a height of 140m above ground (existing). The increase in height from the 130m recommended at 24 June to 140m would result in an increased 30m shadow length at 9am or 3pm; and about 15m at 12-midday. The impact on the Harris Park West or Experiment Farm Conservation Areas from this change would not result in additional properties in the HCAs being unable to achieve two hours of sunlight between 9am and 3pm on 21 June. Accordingly, the increase from 130m to 140m is considered reasonable.

#### **8.4. Impacts on Heritage Conservation Areas**

The changes tested for Blocks A and B had no impact on the South Parramatta Heritage Conservation Area. Shadows cast by the extruded height controls on these blocks did not extend far enough to reach the conservation area.

However, the proposed inclusion of a gap breaking up the 243m (RL) control at Westfield and through to the block at Campbell Street to provide a blue sky corridor to Church Street and Centenary Square resulted in improvements in overshadowing impacts on the South Parramatta Heritage Conservation Area where, as a consequence, all properties in the South Parramatta Heritage Conservation Area will be able to obtain at least two hours sunlight access between 9am and 3pm on 21 June.

The changes tested for Blocks E and F resulted in one additional property not being able to achieve two hours of sunlight access between 9am and 3pm on 21 June.

Changes tested for Blocks I and K did not result in any additional properties within the Harris Park West or Experiment Farm Heritage Conservation Areas not being able to achieve two hours of sunlight access between 9am and 3pm on 21 June.

The results of this testing are summarised in Table 14.

| Heritage Conservation Area   | Number of Parcels | Parcels with less than 2 hours sunlight access |         | Parcels with 2 hours or more of sunlight access |         |
|------------------------------|-------------------|--|---------|---|---------|
| South Parramatta             | 166               | 0  | (0%)    | 166   | (100%)  |
| Tottenham Street             | 14                | 3  | (21.4%) | 11  | (78.6%) |
| Harris Park West             | 184               | 50   | (27.2%) | 134   | (72.8%) |
| Experiment Farm              | 121               | 0  | (0%)    | 121   | (100%)  |
| <i>Total across all HCAs</i> | 485               | 53   | (10.9%) | 432   | (89.1%) |

Table 22 - Comparison of land parcels achieving two hours or more of sunlight access between 9am and 3pm on 21 June under further testing for the Incentive Height of Buildings controls within the CBD Planning Proposal (iteration 7)

The mapped parcel analysis for these results is included at Appendix 7.

### 8.5. Impacts on Open Space Areas

The changes tested for Blocks A and B had no additional impact on overshadowing Ollie Webb Reserve, but nor did they improve the situation markedly. This is due to the potential shadows cast by development on the Great Western Highway being overwhelmed themselves by potential shadows from taller development to the immediate north on the Westfield block (which still retains the 243m (RL) height).

The proposed inclusion of a gap breaking up the 243m (RL) control at Westfield and through to the block at Campbell Street to provide a blue sky corridor to Church Street and Centenary Square also resulted in improvements in overshadowing impacts to Noller Park where, as a consequence, it was able to achieve one additional hour of sunlight access to at least 50% of the park between the hours of 9am and 3pm on 21 June. The average overshadowing across the 9am to 3pm period also improved by 11% - dropping from nearly 40% under the 24 June recommendations (iteration 3) to 28% under the 3 October refinements (iteration 7).

The changes tested for Blocks E and F had no additional impact on open space areas as these sites are further south than the open space areas identified for protection.

The changes tested for Blocks I and K had no additional impact on open space areas as the shadow profile was generally similar to that tested for iteration 3 when the shadows impacted open space areas. The shadow cast by modified testing at Block I did not extend to impact open space areas by 3pm on 21 June while the detailed building profile testing at Block K was generally consistent with the larger extruded volumes from iteration 3.

### 8.6. Conclusions and Recommendation

The further testing undertaken since 24 June has provided further opportunities to address issues raised and refine the model. The overall impact of these refinements is considered minor while still managing to effectively address the conditions of the Gateway Determination.

It is considered likely that further refinements may be made depending on consultation with state agencies and representations made at the public exhibition to the CBD Planning Proposal. Consequently, the overshadowing analysis undertaken at this stage is recommended to be recognised as a snapshot at a particular point in time and could be subject to further refinement following consultation.

# Appendix 1 – Overshadowing of Heritage Conservation Areas

This Appendix contains the comparative shadow analysis for the Heritage Conservation Areas for the six heritage conservation areas to the south and north of the Parramatta CBD. This analysis models the overshadowing for the current Height of Buildings controls (light grey) against the proposed Incentive Height of Buildings controls (dark grey) at 30-minute intervals between 9am and 3pm on 21 June.

In Figure 43 to Figure 55, the southern Heritage Conservation Areas are shown in red hatching and are in order from left to right: South Parramatta Conservation Area, Tottenham Street Conservation Area, Harris Park West Conservation Area and Experiment Farm Conservation Area.

In Figure 56 to Figure 68, the northern Heritage Conservation Areas are in order from left to right: North Parramatta Conservation Area and Sorrell Street Conservation Area, which were tested in accordance with feedback from a previous Councillor Workshop.

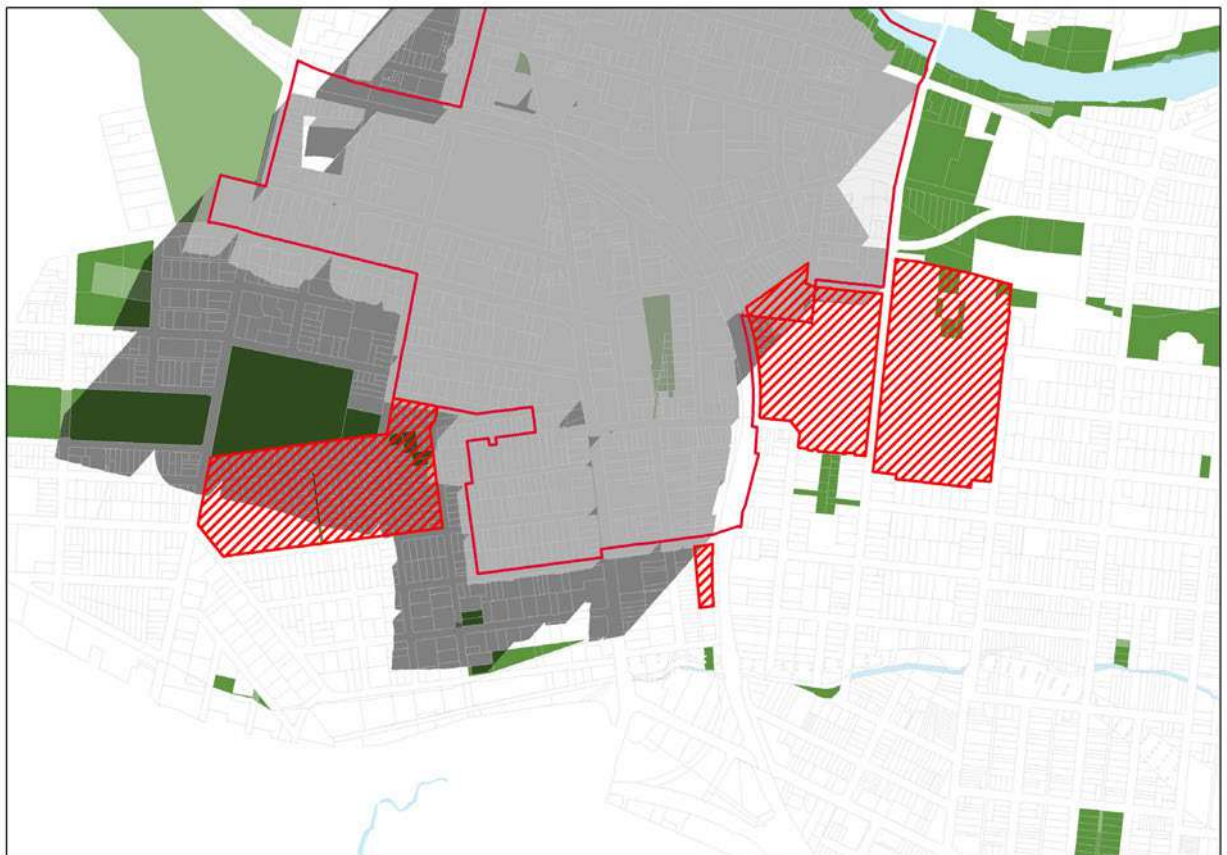


Figure 43 - Current and Proposed Controls overshadowing - 21 June - 9am

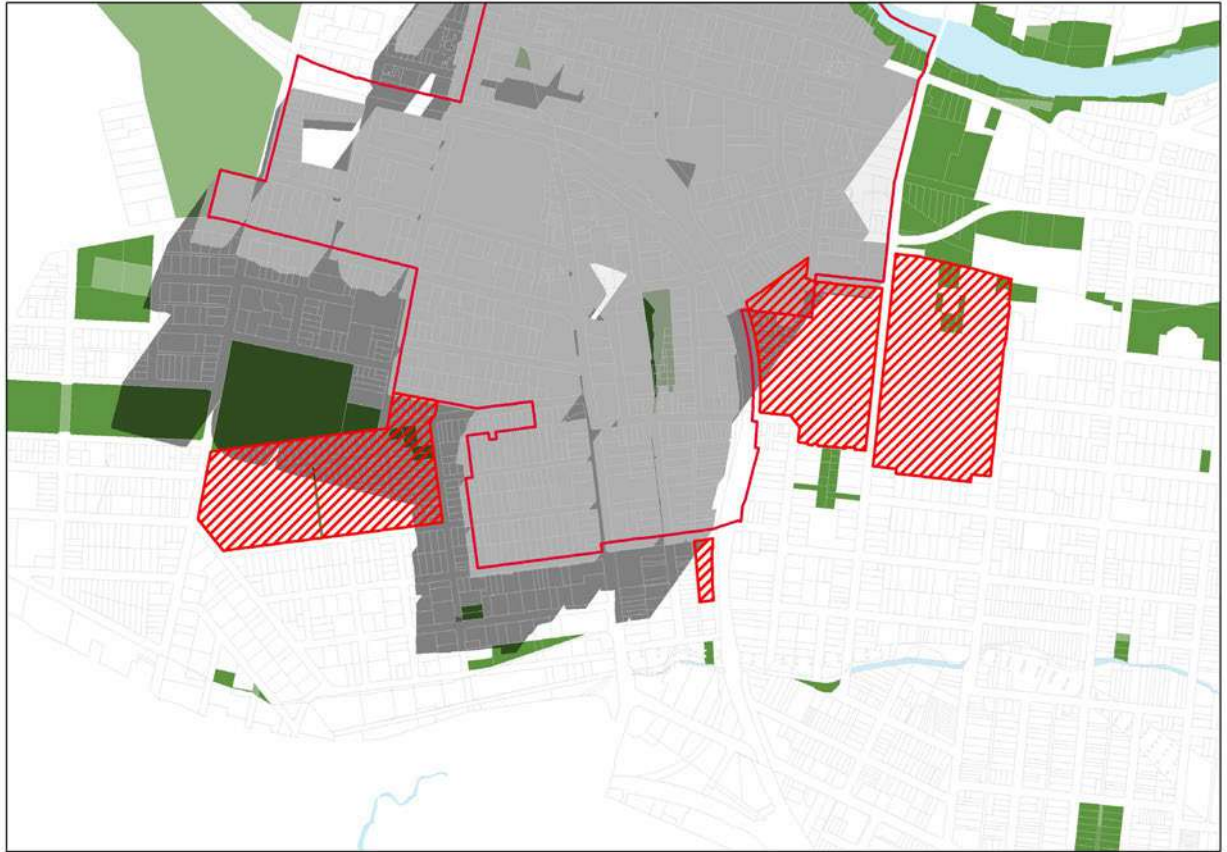


Figure 44 - Current and Proposed Controls overshadowing - 21 June - 9:30am

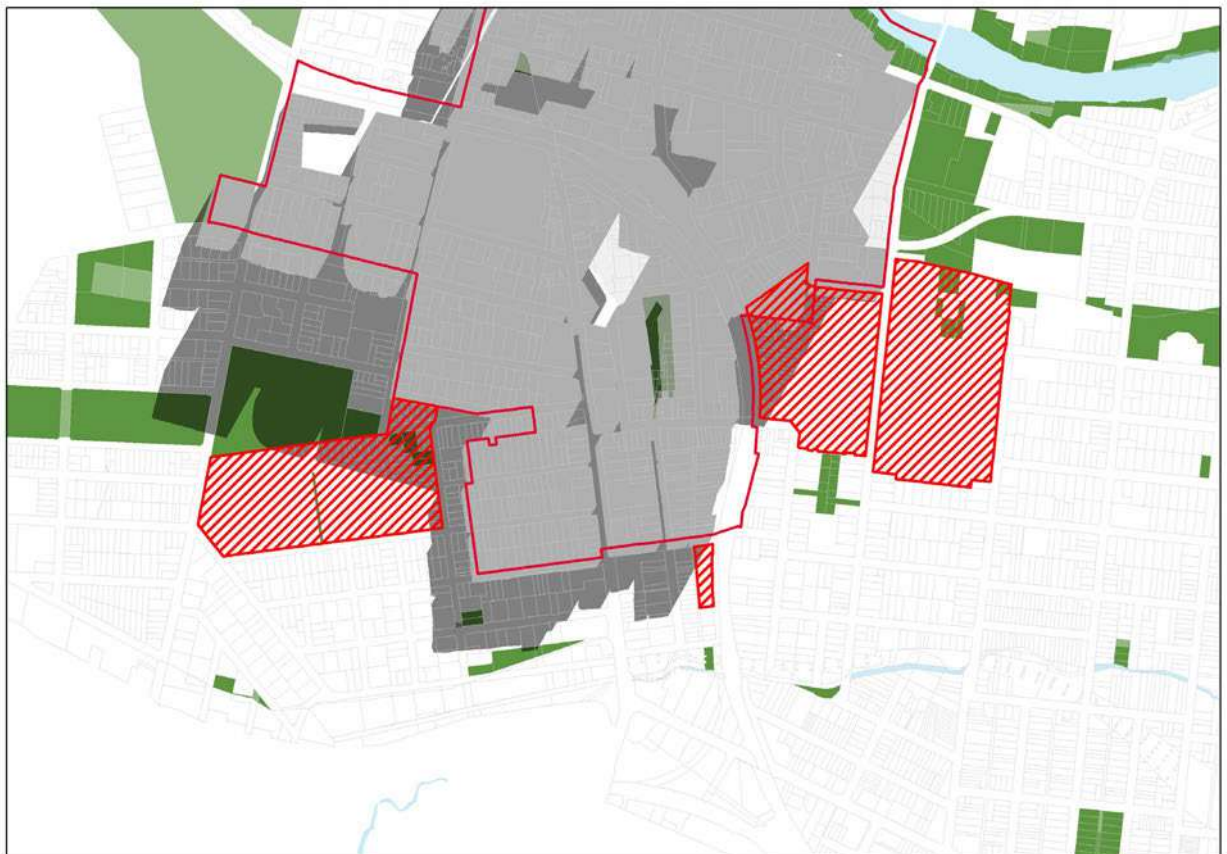


Figure 45 - Current and Proposed Controls overshadowing - 21 June - 10am





Figure 46 - Current and Proposed Controls overshadowing - 21 June - 10:30am



Figure 47 - Current and Proposed Controls overshadowing - 21 June - 11am



Figure 48 - Current and Proposed Controls overshadowing - 21 June - 11:30am



Figure 49 - Current and Proposed Controls overshadowing - 21 June - 12:noon



Figure 50 - Current and Proposed Controls overshadowing - 21 June - 12:30pm



Figure 51 - Current and Proposed Controls overshadowing - 21 June - 1pm



Figure 52 - Current and Proposed Controls overshadowing - 21 June - 1:30pm



Figure 53 - Current and Proposed Controls overshadowing - 21 June - 2pm



Figure 54 - Current and Proposed Controls overshadowing - 21 June - 2:30pm

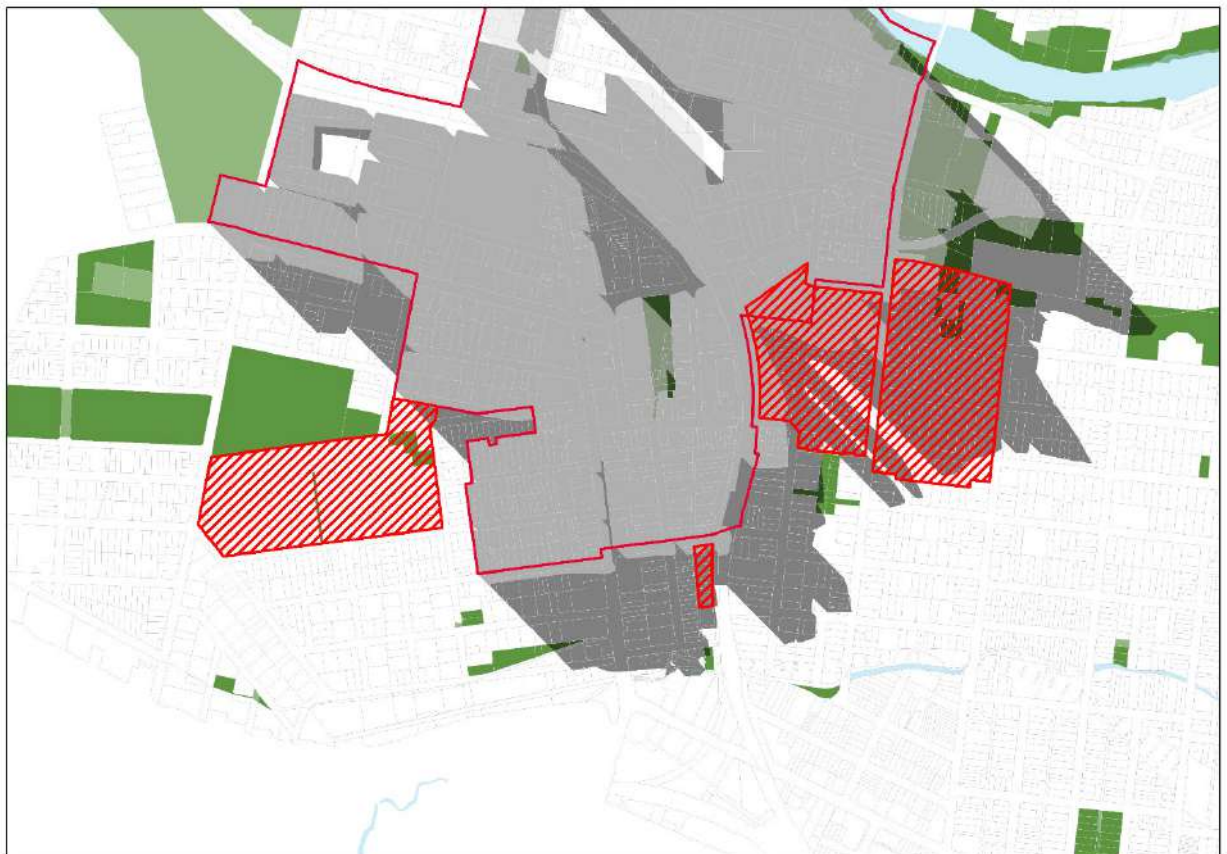


Figure 55 - Current and Proposed Controls overshadowing - 21 June - 3pm



Figure 56 - Current and Proposed Controls overshadowing - 21 June - 9am



Figure 57 - Current and Proposed Controls overshadowing - 21 June - 9am



Figure 58 - Current and Proposed Controls overshadowing - 21 June - 10am



Figure 59 - Current and Proposed Controls overshadowing - 21 June - 10:30am



Figure 60 - Current and Proposed Controls overshadowing - 21 June - 11am



Figure 61 - Current and Proposed Controls overshadowing - 21 June - 11:30am





Figure 62 - Current and Proposed Controls overshadowing - 21 June - 12:noon



Figure 63 - Current and Proposed Controls overshadowing - 21 June - 12:30pm



Figure 64 - Current and Proposed Controls overshadowing - 21 June - 1pm



Figure 65 - Current and Proposed Controls overshadowing - 21 June - 1:30pm



Figure 66 - Current and Proposed Controls overshadowing - 21 June - 2pm



Figure 67 - Current and Proposed Controls overshadowing - 21 June - 2:30pm



Figure 68 - Current and Proposed Controls overshadowing - 21 June - 3pm

# Appendix 2 – Parcel-based Assessment of Overshadowing of Heritage Conservation Areas

This Appendix contains the comparative shadow analysis for the Heritage Conservation Areas for the four heritage conservation areas to the south of the Parramatta CBD. This analysis models the overshadowing for the current Height of Buildings controls (top row) against the proposed Incentive Height of Buildings controls (bottom row) at 30-minute intervals between 9am and 3pm on 21 June.

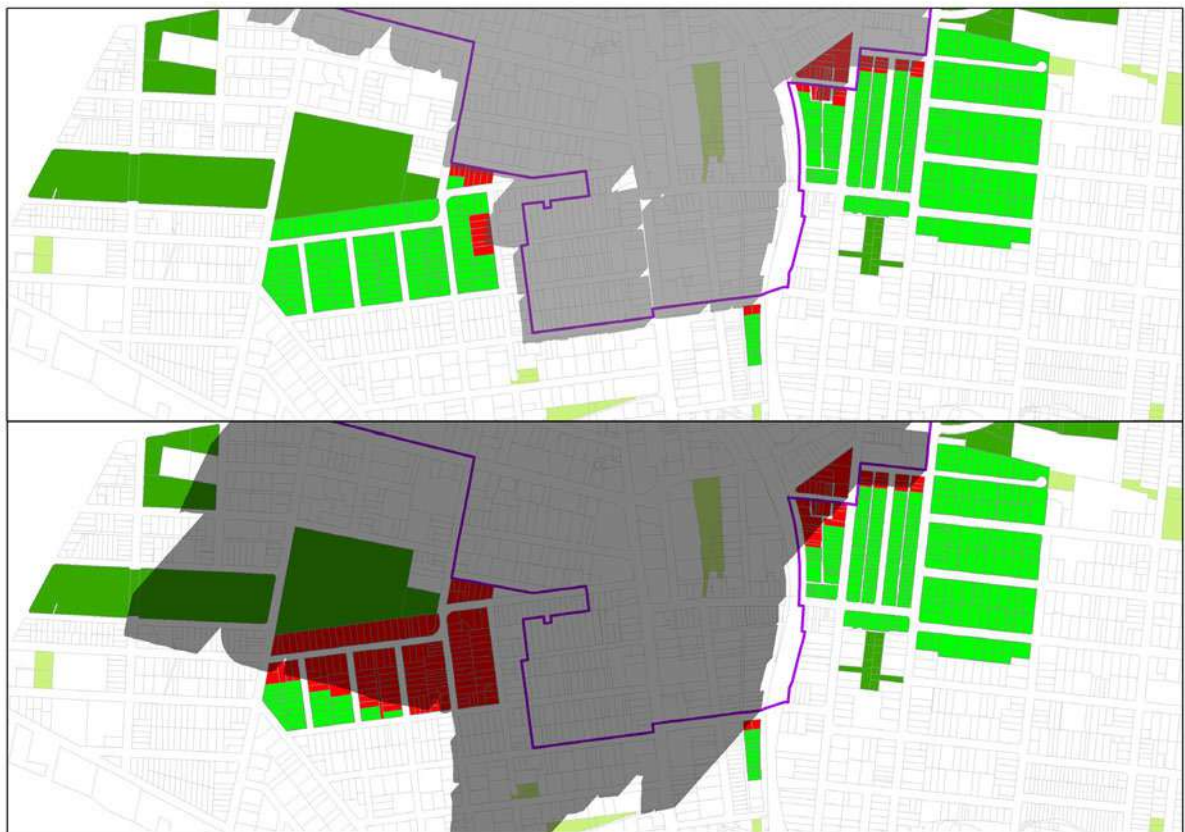


Figure 69 - Comparison of overshadowing between the Height of Buildings control in Parramatta LEP 2011 (top) and the Incentive Height of Buildings control of the CBD Planning Proposal (bottom) - 21 June - 9am

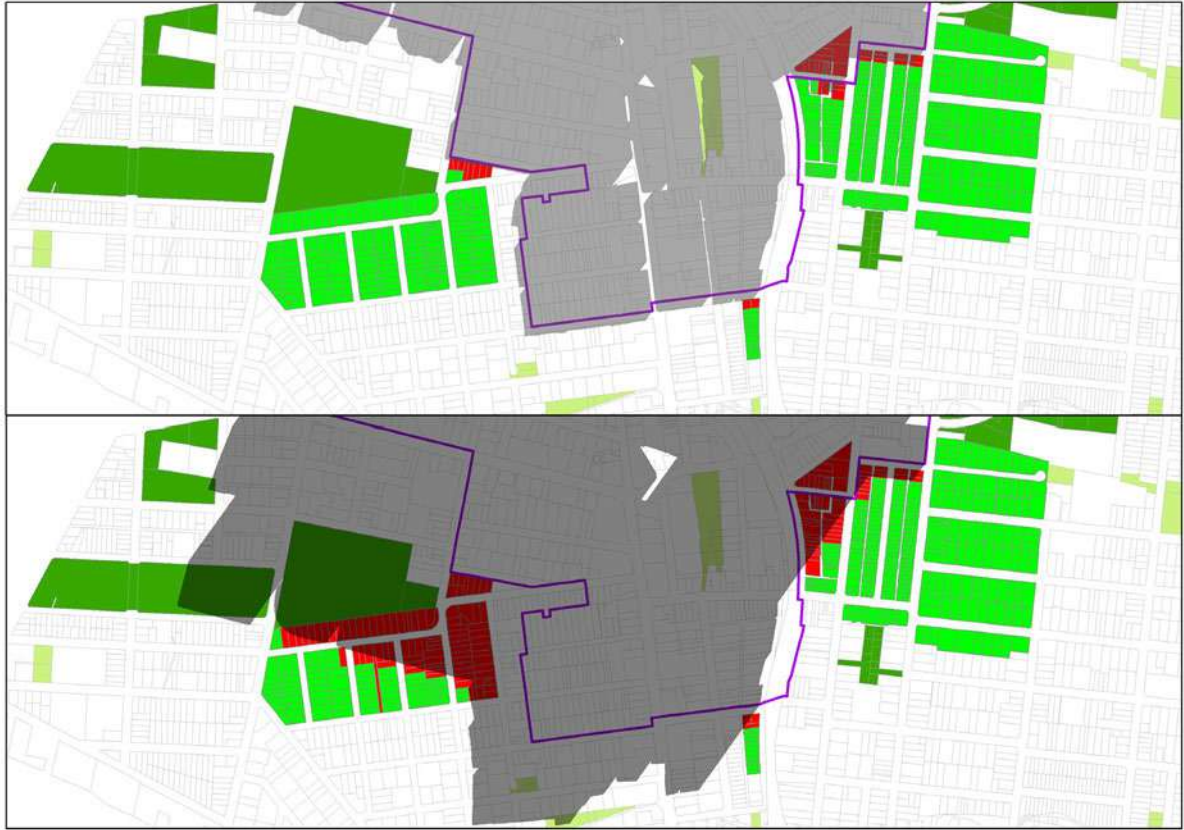


Figure 70 - Comparison of overshadowing between the Height of Buildings control in Parramatta LEP 2011 (top) and the Incentive Height of Buildings control of the CBD Planning Proposal (bottom) - 21 June - 9:30am

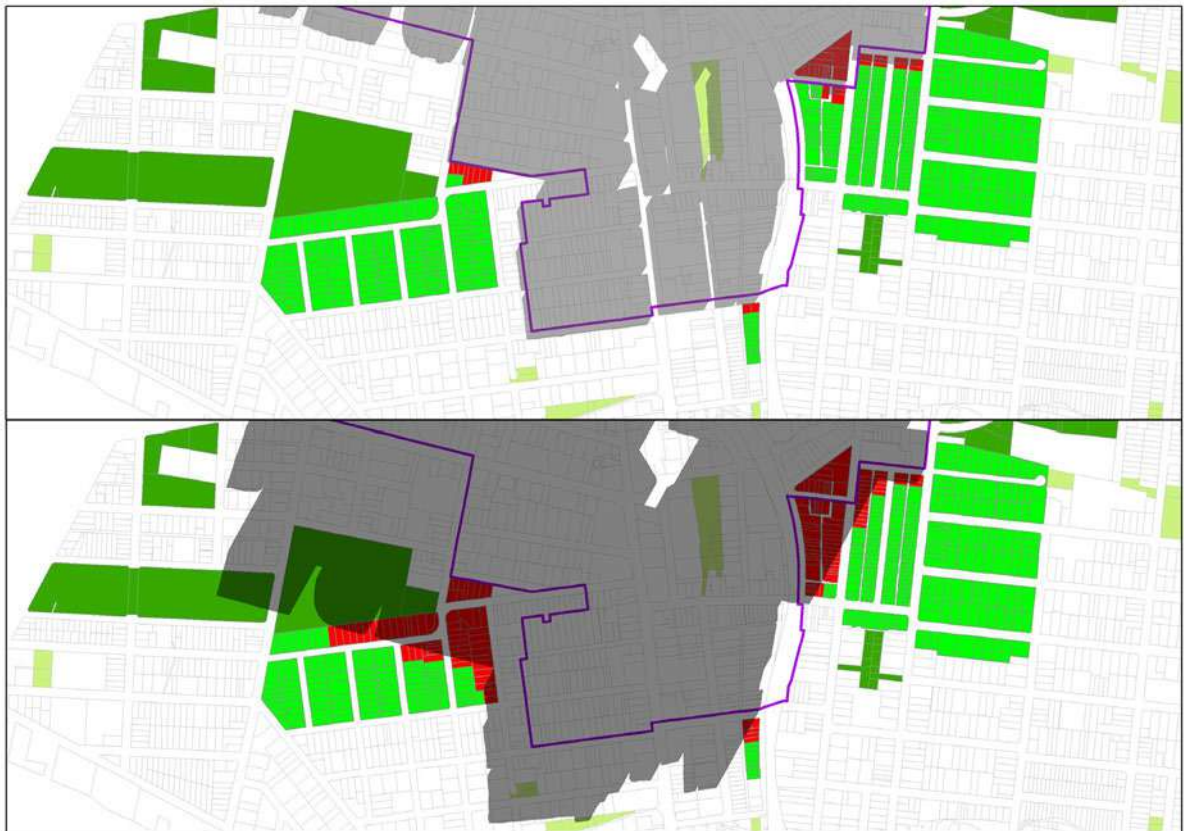


Figure 71 - Comparison of overshadowing between the Height of Buildings control in Parramatta LEP 2011 (top) and the Incentive Height of Buildings control of the CBD Planning Proposal (bottom) - 21 June - 10am

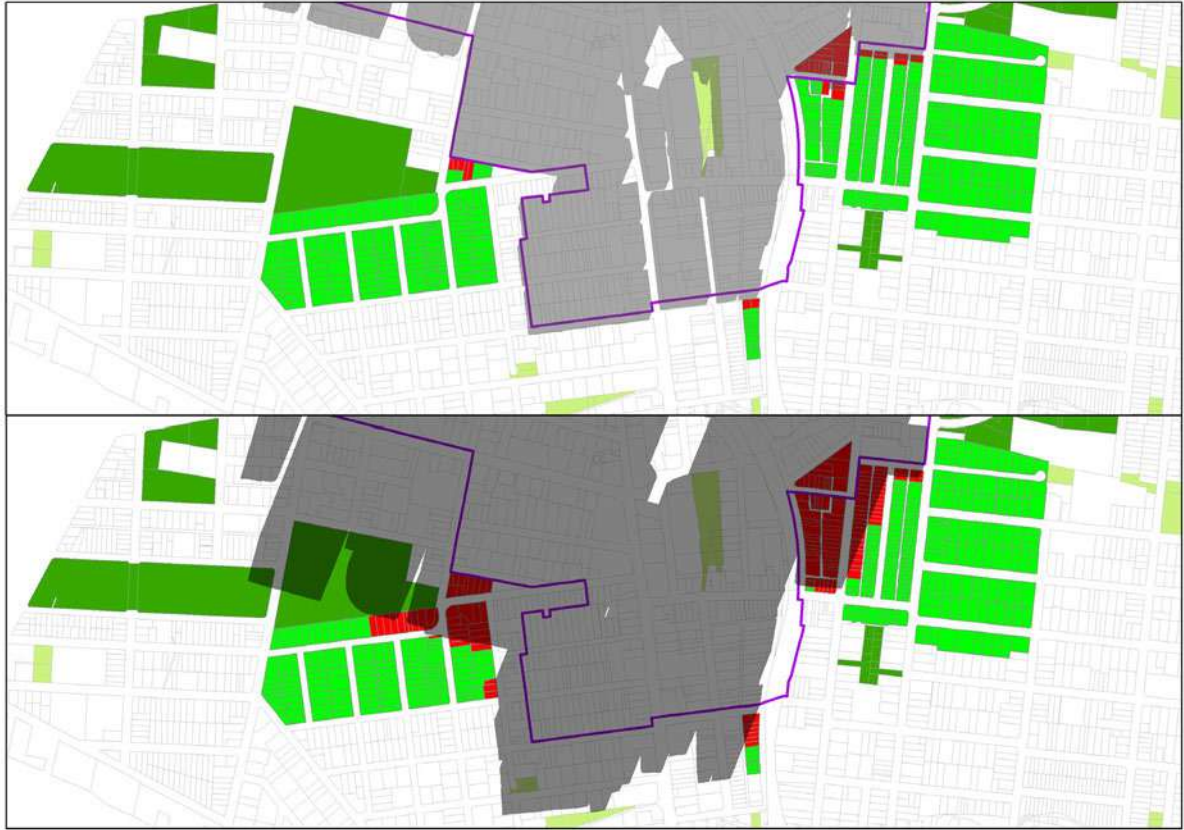


Figure 72 - Comparison of overshadowing between the Height of Buildings control in Parramatta LEP 2011 (top) and the Incentive Height of Buildings control of the CBD Planning Proposal (bottom) - 21 June - 10:30am

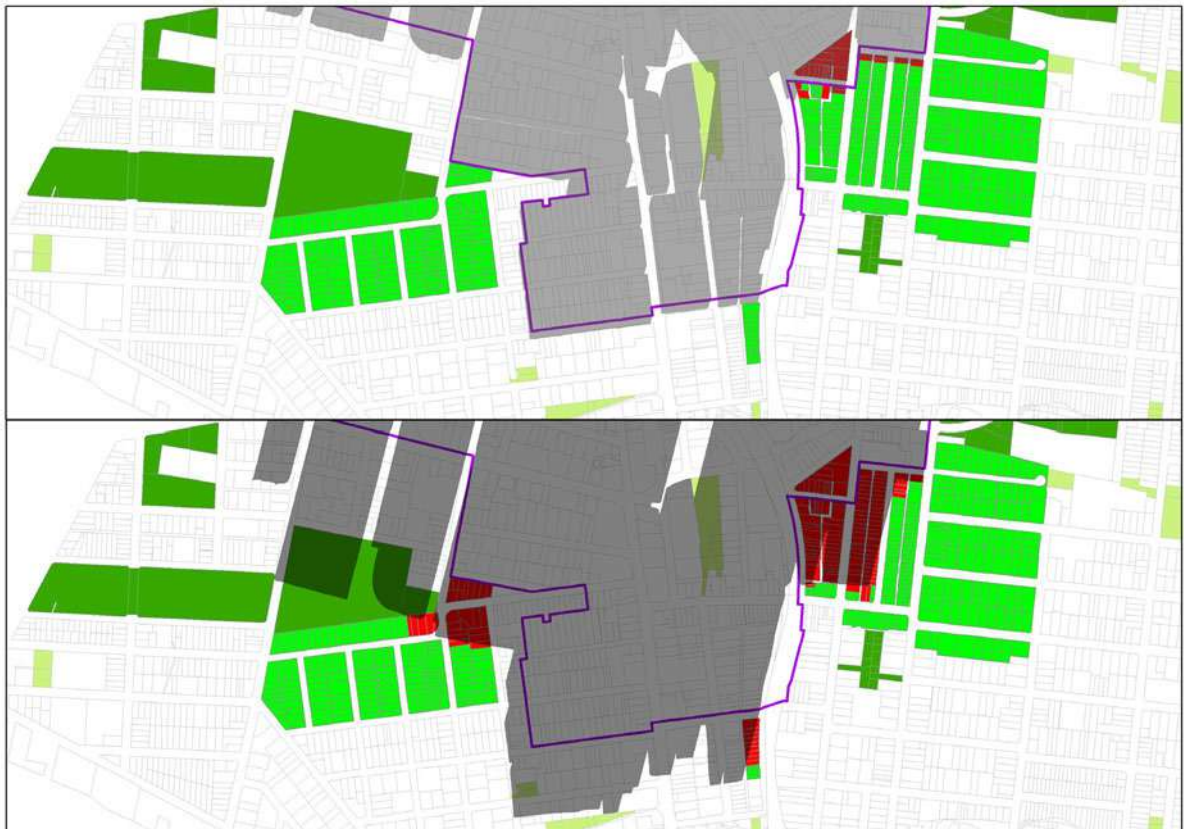


Figure 73 - Comparison of overshadowing between the Height of Buildings control in Parramatta LEP 2011 (top) and the Incentive Height of Buildings control of the CBD Planning Proposal (bottom) - 21 June - 11am

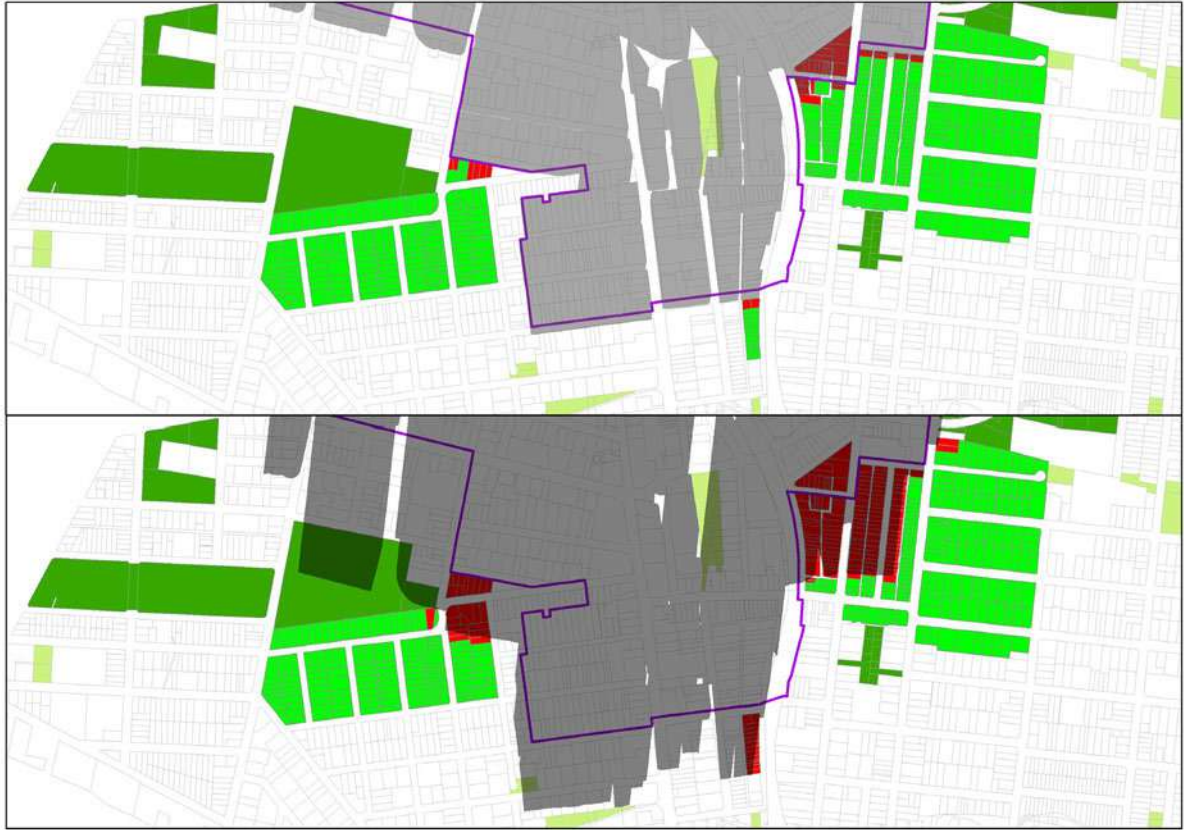


Figure 74 - Comparison of overshadowing between the Height of Buildings control in Parramatta LEP 2011 (top) and the Incentive Height of Buildings control of the CBD Planning Proposal (bottom) - 21 June - 11:30am

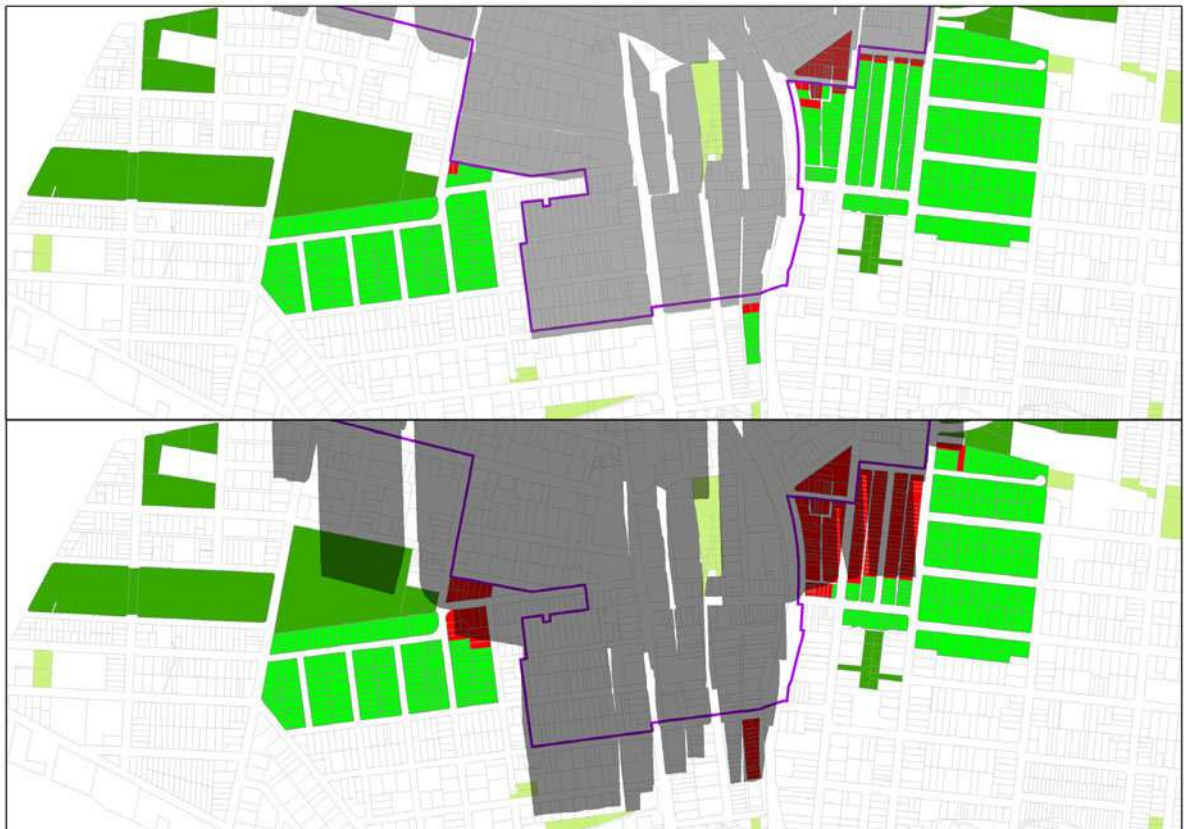


Figure 75 - Comparison of overshadowing between the Height of Buildings control in Parramatta LEP 2011 (top) and the Incentive Height of Buildings control of the CBD Planning Proposal (bottom) - 21 June - 12:noon



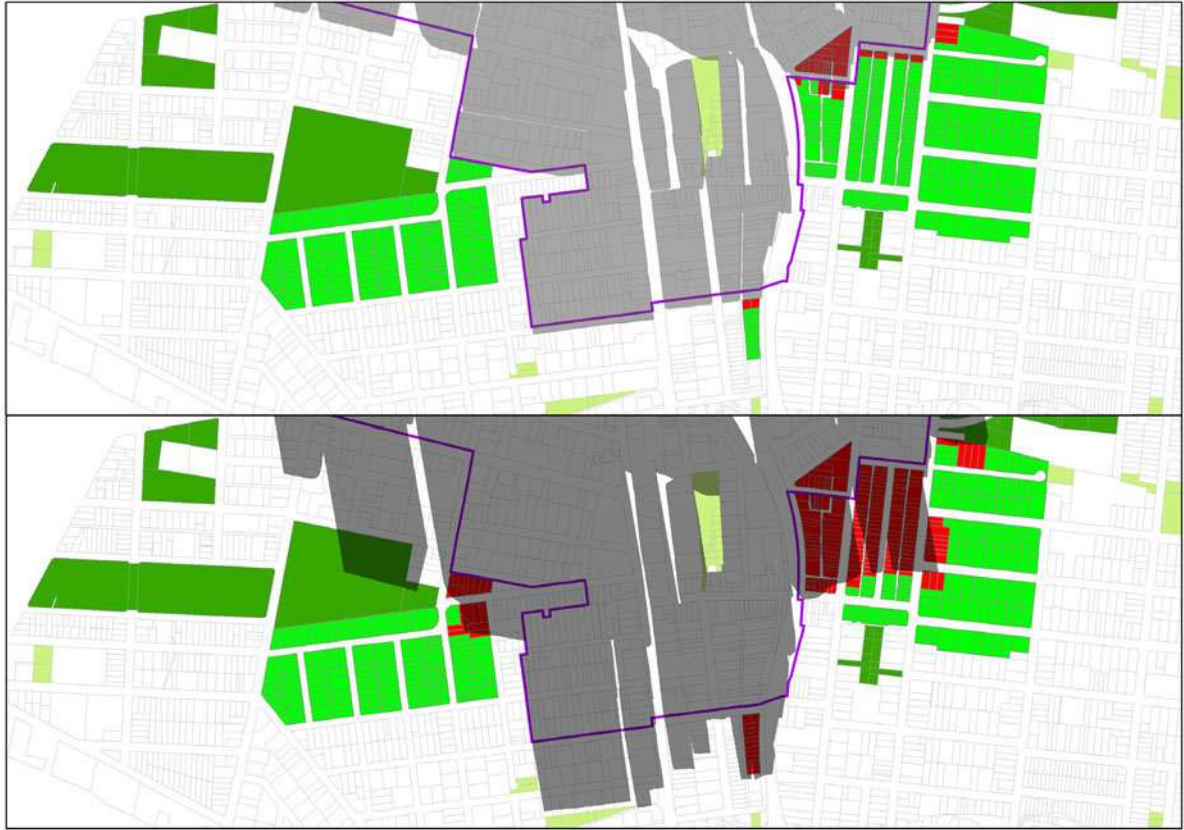


Figure 76 - Comparison of overshadowing between the Height of Buildings control in Parramatta LEP 2011 (top) and the Incentive Height of Buildings control of the CBD Planning Proposal (bottom) - 21 June - 12:30pm

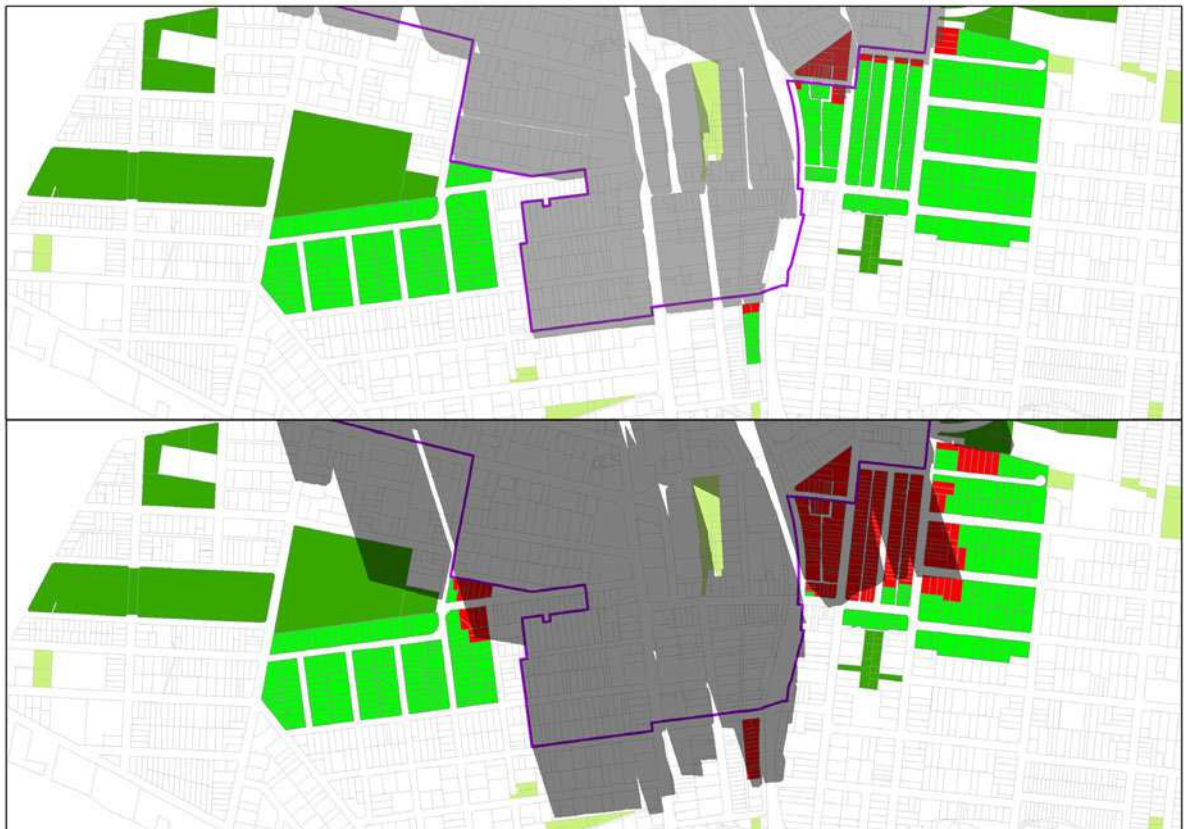


Figure 77 - Comparison of overshadowing between the Height of Buildings control in Parramatta LEP 2011 (top) and the Incentive Height of Buildings control of the CBD Planning Proposal (bottom) - 21 June - 1pm

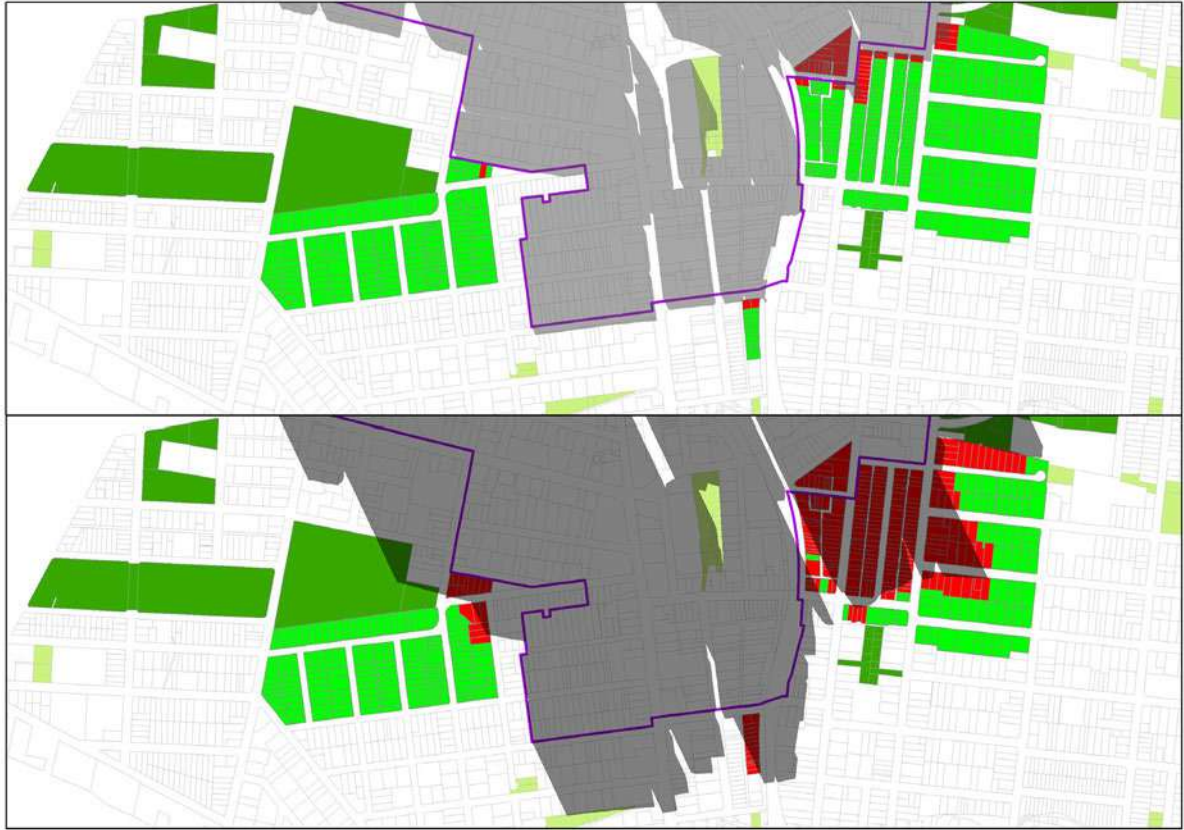


Figure 78 - Comparison of overshadowing between the Height of Buildings control in Parramatta LEP 2011 (top) and the Incentive Height of Buildings control of the CBD Planning Proposal (bottom) - 21 June - 1:30pm

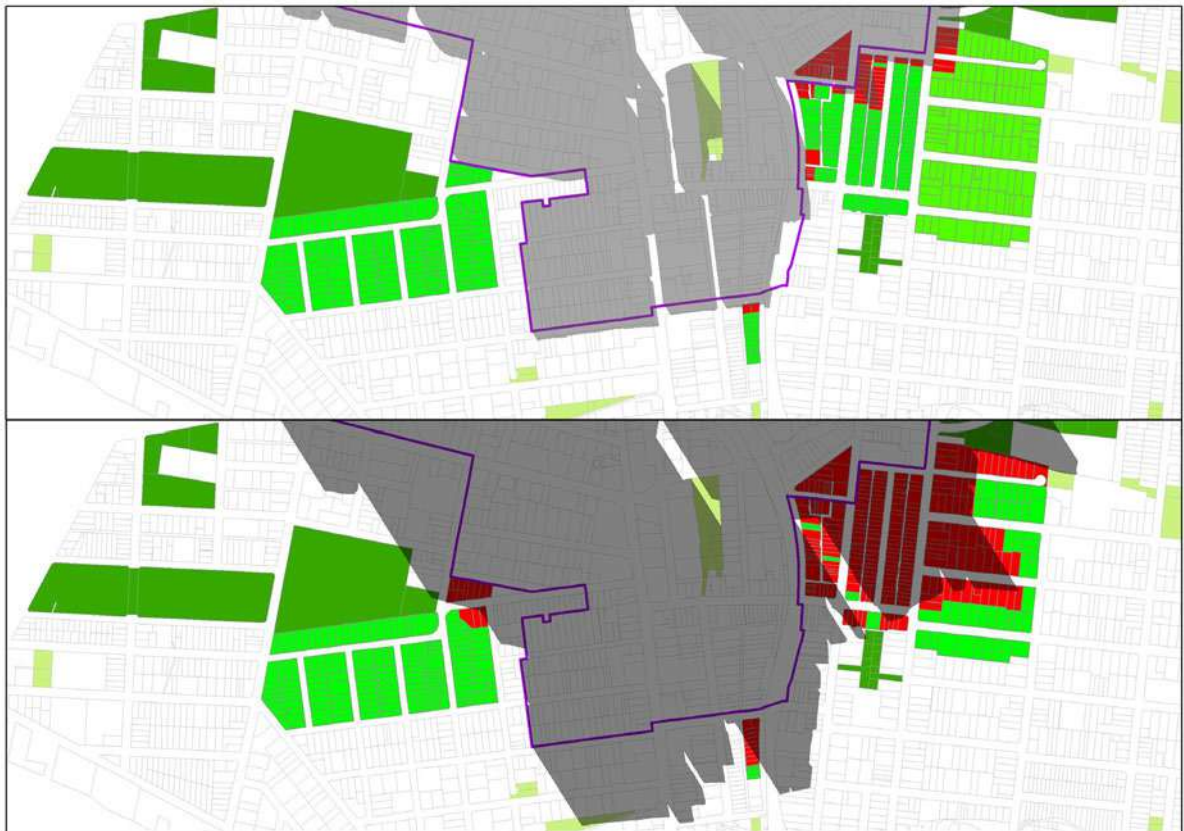


Figure 79 - Comparison of overshadowing between the Height of Buildings control in Parramatta LEP 2011 (top) and the Incentive Height of Buildings control of the CBD Planning Proposal (bottom) - 21 June - 2pm

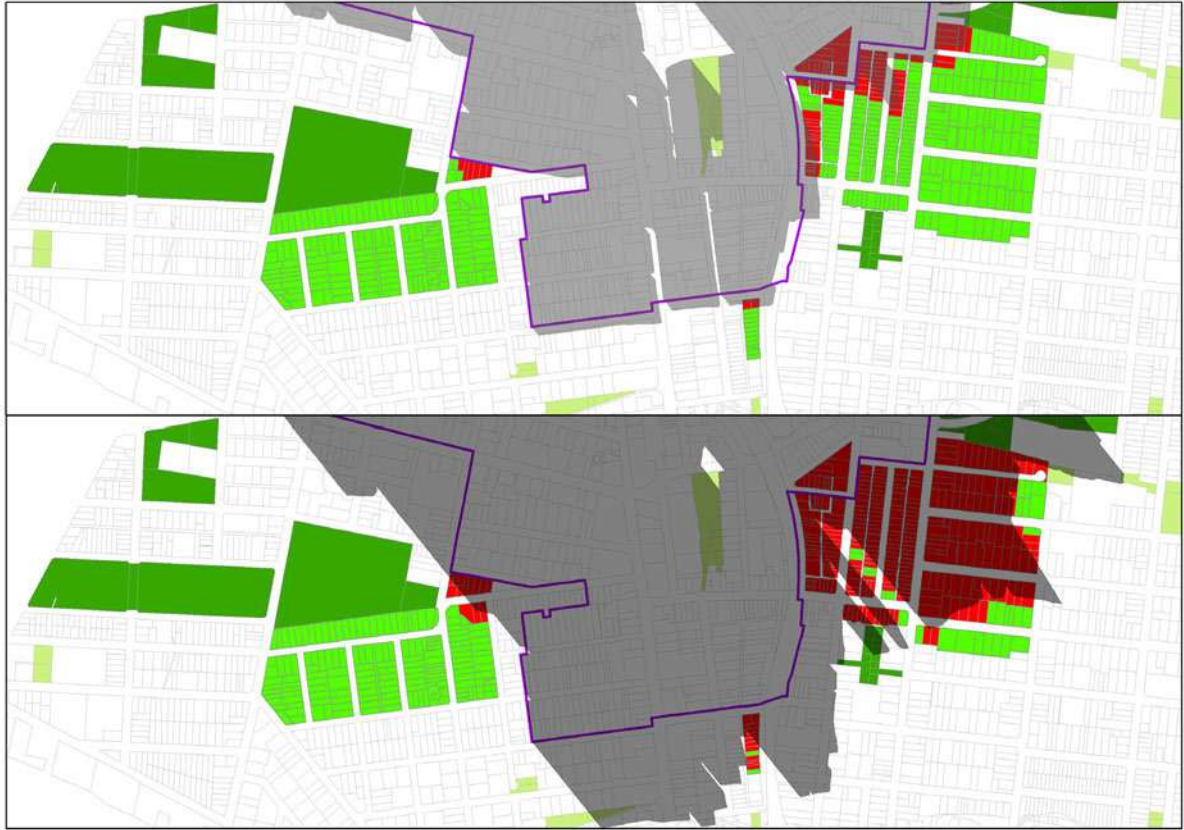


Figure 80 - Comparison of overshadowing between the Height of Buildings control in Parramatta LEP 2011 (top) and the Incentive Height of Buildings control of the CBD Planning Proposal (bottom) - 21 June - 2:30pm

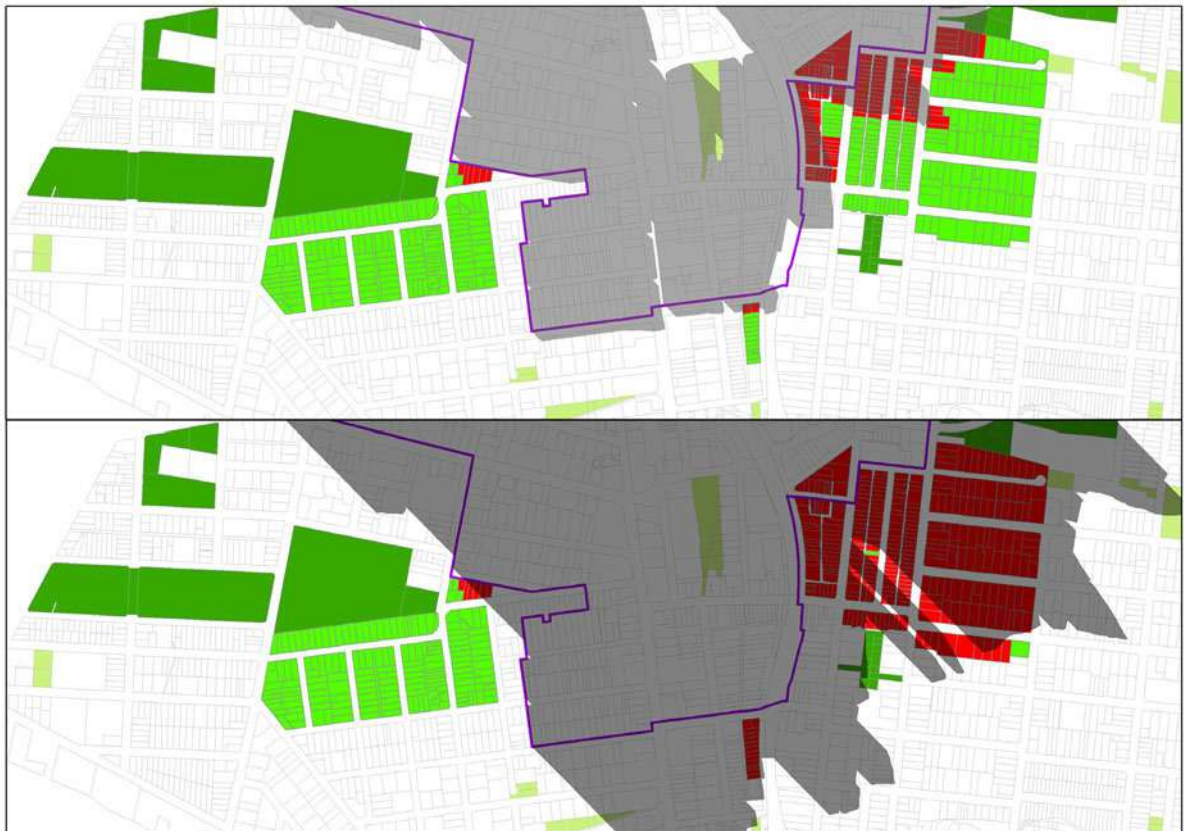


Figure 81 - Comparison of overshadowing between the Height of Buildings control in Parramatta LEP 2011 (top) and the Incentive Height of Buildings control of the CBD Planning Proposal (bottom) - 21 June - 3pm

# Appendix 3 – Block Assessments

This Appendix contains the detailed assessments of the blocks for reviewing the Incentive Height of Buildings control to reduce the impacts of overshadowing on the heritage conservation areas.

**Recommended height controls have since been tested further and refined for Blocks A to F. Details of this analysis and results can be found in Section 8 of this paper.**

# Blocks A & B



**Current Height: 28m**  
**CBD PP Draft Height: 243m (RL) (NHC)**



153

Image:  
NearMap

# Blocks A & B



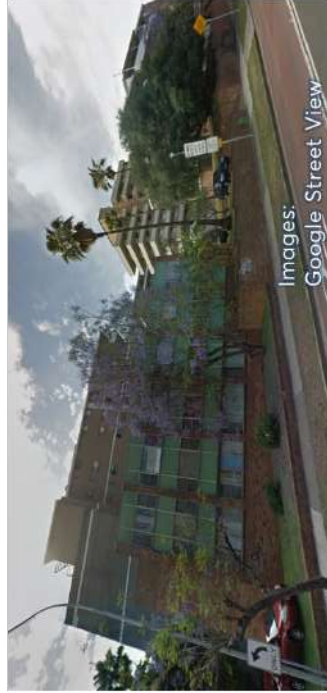
**Current Height: 28m**  
**CBD PP Draft Height:**  
**243m (RL) (NHC)**



# Blocks A & B



**Current Height: 28m**  
**CBD PP Draft Height:**  
**243m (RL) (NHC)**



# Blocks A & B



**Current Height: 28m**  
**CBD PP Draft Height: 243m (RL) (NHC)**  
**Revised Height: 100m\***

**\* Revised height includes allowances for Design Excellence + HPB**

Overshadowing Analysis – June 2019



Current Height Controls



CBD PP Draft Height Controls

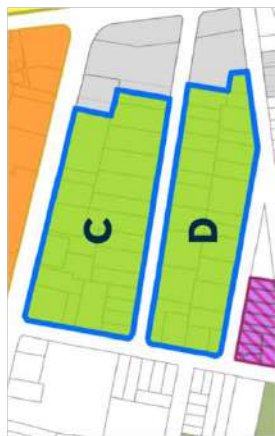


Revised Height Controls\*

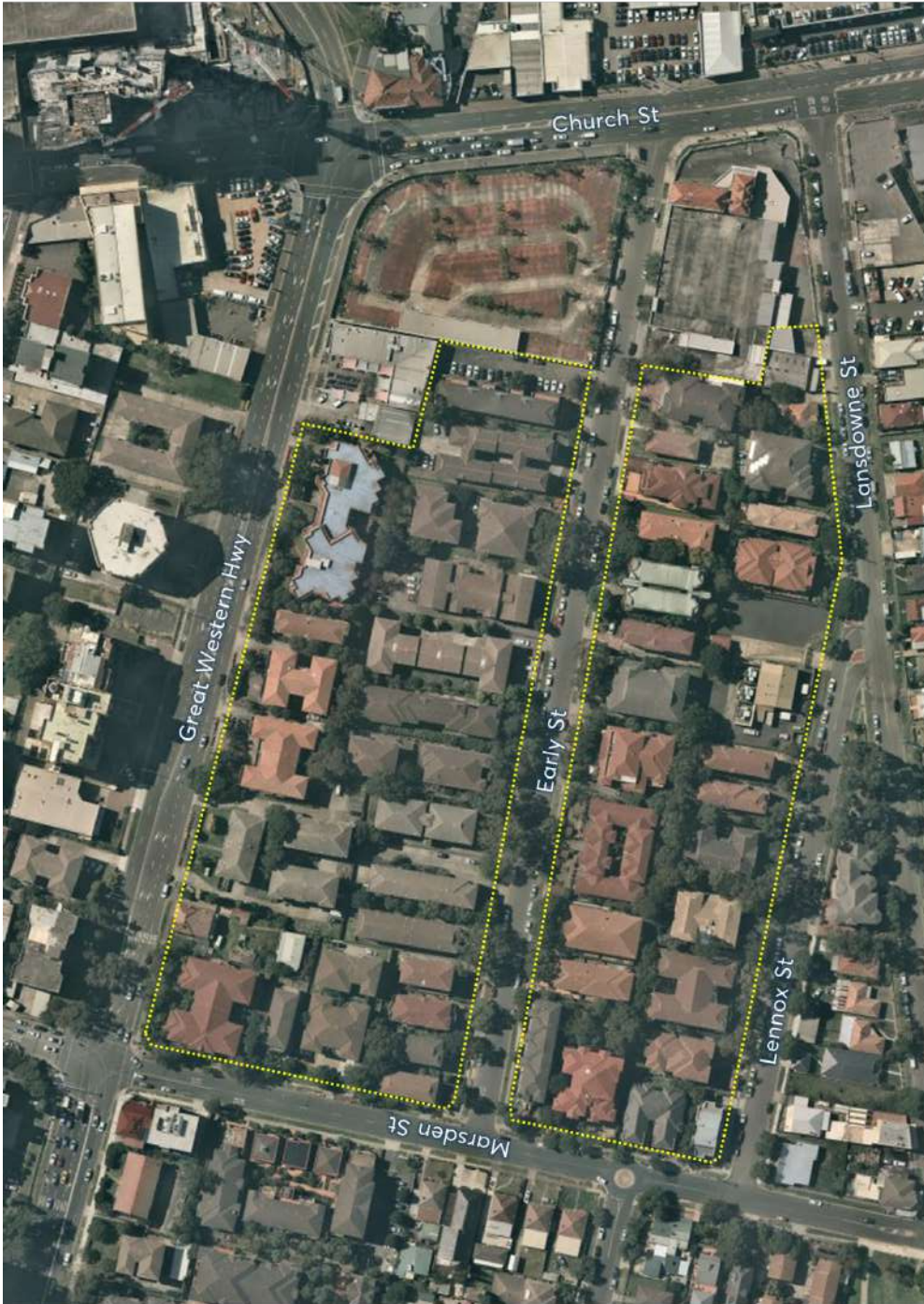
53



## Blocks C & D



**Current Height: 11m/12m**  
**CBD PP Draft Heights:**  
**92m (NHC)/26m/20m**

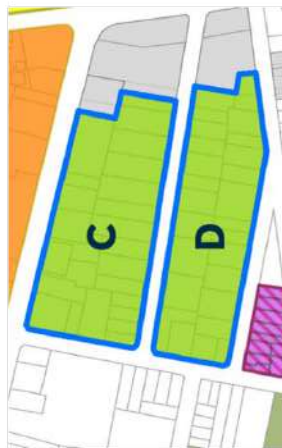


100

Imaget  
NearMap



## Blocks C & D

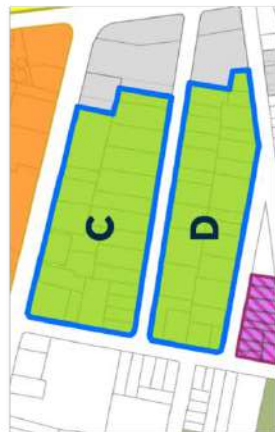


**Current Height: 11m/12m**

**CBD PP Draft Heights:  
92m (NHC)/26m/20m**

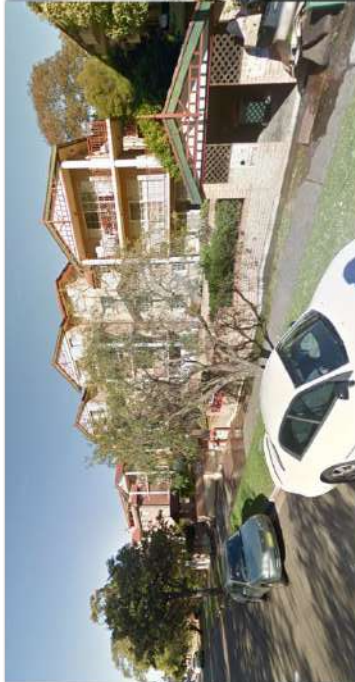
Overshadowing Analysis – June 2019

# Blocks C & D



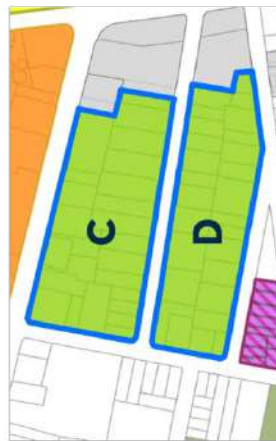
**Current Height: 11m/12m**  
**CBD PP Draft Heights: 92m (NHC)/26m/20m**

Overshadowing Analysis – June 2019



Images: Google Street View

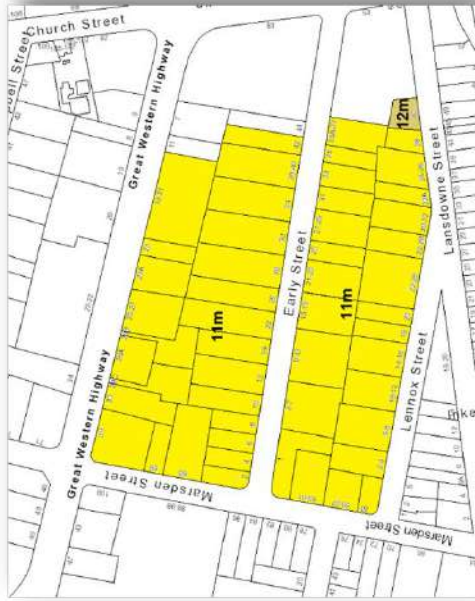
# Blocks C & D



**Current Height: 11m/12m**  
**CBD PP Draft Heights: 92m (NHC)/26m/20m**  
**Revised Heights: 49m/11m/12m\***

**\* Revised height includes allowances for Design Excellence + HPB**

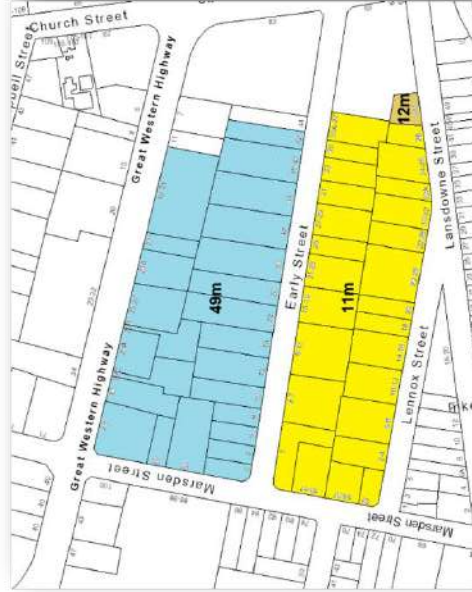
Overshadowing Analysis – June 2019



Current Height Controls



CBD PP Draft Height Controls



Revised Height Controls\*

133

# Blocks E & F



**Current Height: 12m**  
**CBD PP Height: 12m/92m**  
**(NHC)**

Overshadowing Analysis – June 2019



105

Imoget  
NearMap



## Blocks E & F

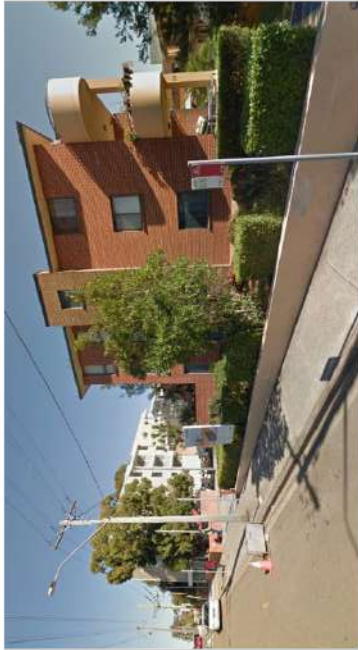


**Current Height: 12m**  
**CBD PP Height: 12m/92m**  
**(NHC)**

# Blocks E & F



**Current Height: 12m**  
**CBD PP Height: 12m/92m**  
**(NHC)**



Overshadowing Analysis – June 2019

Images: Google Street View

# Blocks E & F



**Current Height: 12m**  
**CBD PP Height: 12m/92m (NHC)**  
**Revised Height: 12m/54m/20m\***

**\* Revised height includes allowances for Design Excellence + HPB**



Current Height Controls



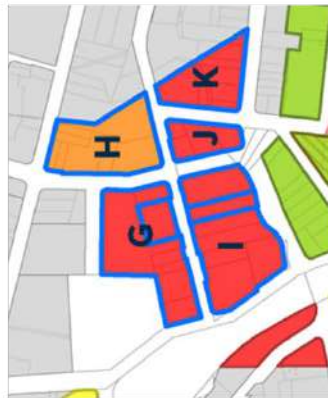
CBD PP Draft Height Controls



Revised Height Controls\*



# Blocks G-K



**Current Height:**  
54m/72m/91.3m/130m

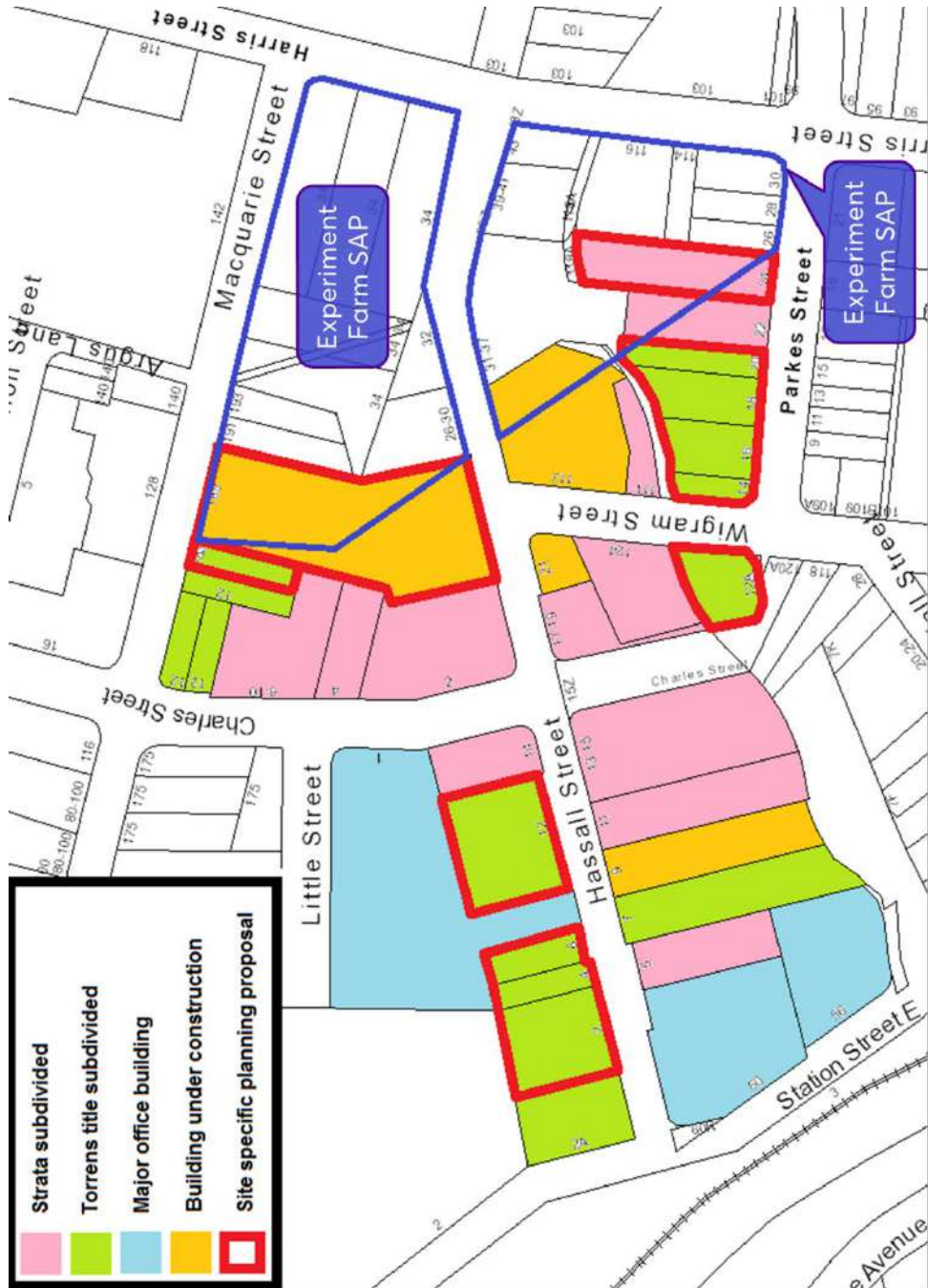
**CBD PP Height: 243m (RL)**  
(NHC)



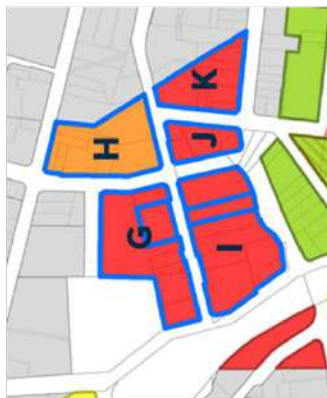
Overshadowing Analysis – June 2019

110

Images  
NearMap



## Blocks G-K

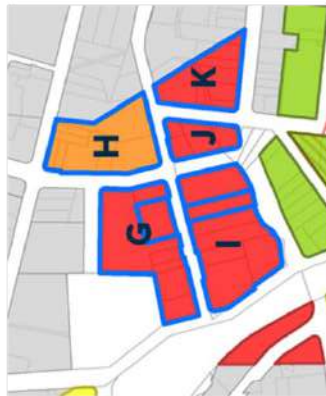


**Current Height:**  
54m/72m/91.3m/130m

**CBD PP Height: 243m (RL)**  
(NHC)

Overshadowing Analysis – June 2019

# Blocks G-K



**Current Height:**  
54m/72m/91.3m/130m

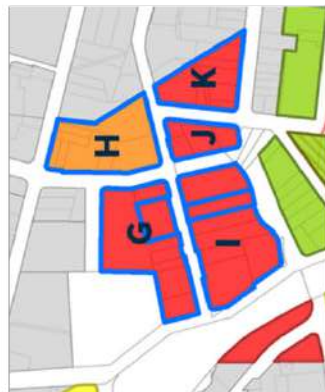
**CBD PP Height: 243m (RL)**  
(NHC)

Overshadowing Analysis – June 2019



Images: Google Street View/Officers

# Blocks G-K



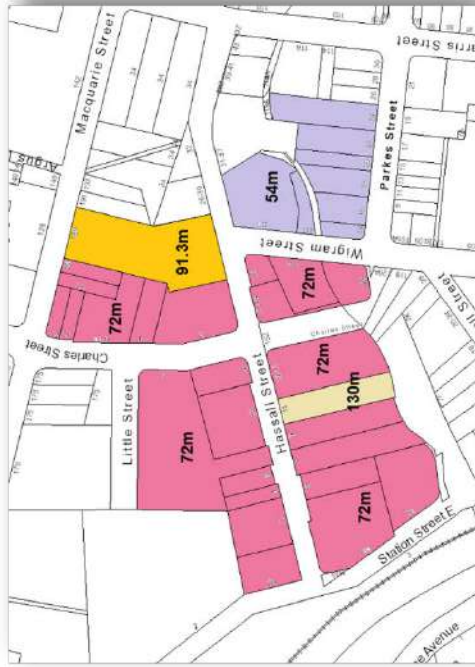
**Current Height:**  
54m/72m/91.3m/130m

**CBD PP Height: 243m (RL) (NHC)**

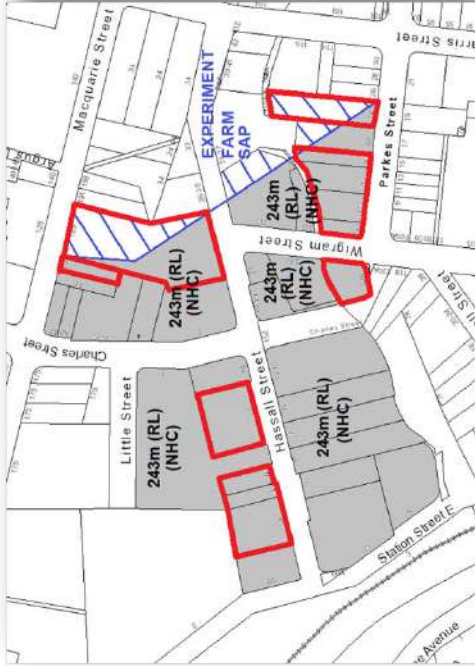
**Revised Height: 72m/80m/90m/130m/167m/192m\***

**\* Revised height includes allowances for Design Excellence + HPB**

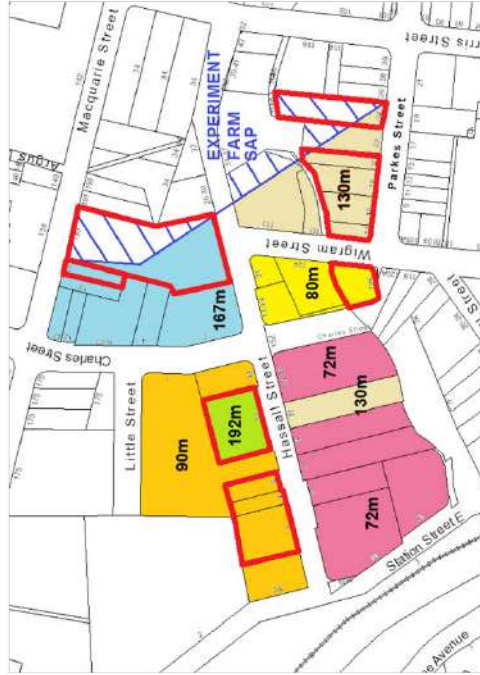
Overshadowing Analysis – June 2019



Current Height Controls



CBD PP Draft Height Controls



Revised Height Controls\*

# Appendix 4 – Parcel-based Assessment of Overshadowing of Heritage Conservation Areas with revised Incentive Height of Buildings controls

This Appendix contains the comparative shadow analysis for the Heritage Conservation Areas for the four heritage conservation areas to the south of the Parramatta CBD. This analysis models the overshadowing for the Incentive Height of Buildings controls (top row) within the CBD Planning Proposal against the revised Incentive Height of Buildings controls (bottom row) at 30-minute intervals between 9am and 3pm on 21 June.

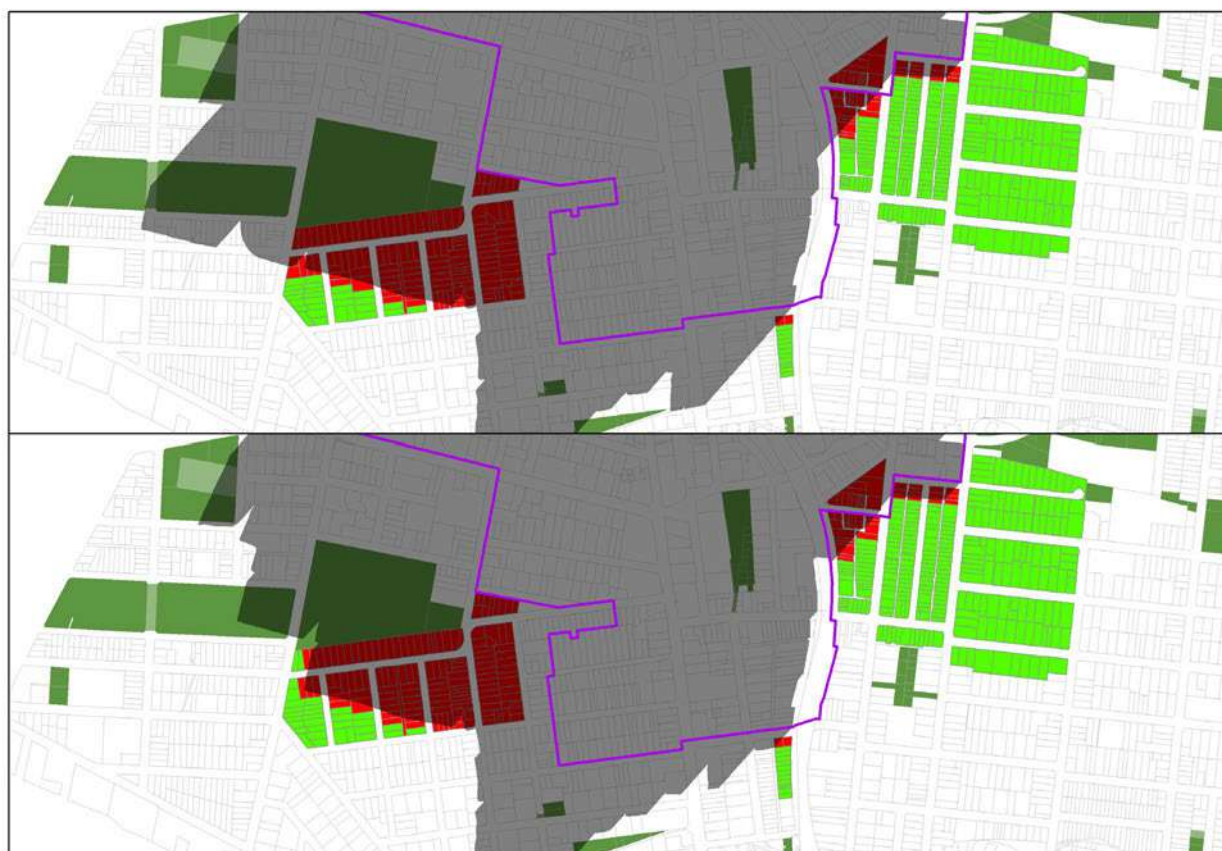


Figure 82 - Comparison of overshadowing between the Incentive Height of Buildings control in the CBD Planning Proposal (top) and the proposed revisions to the Incentive Height of Buildings control (bottom) - 21 June - 9am

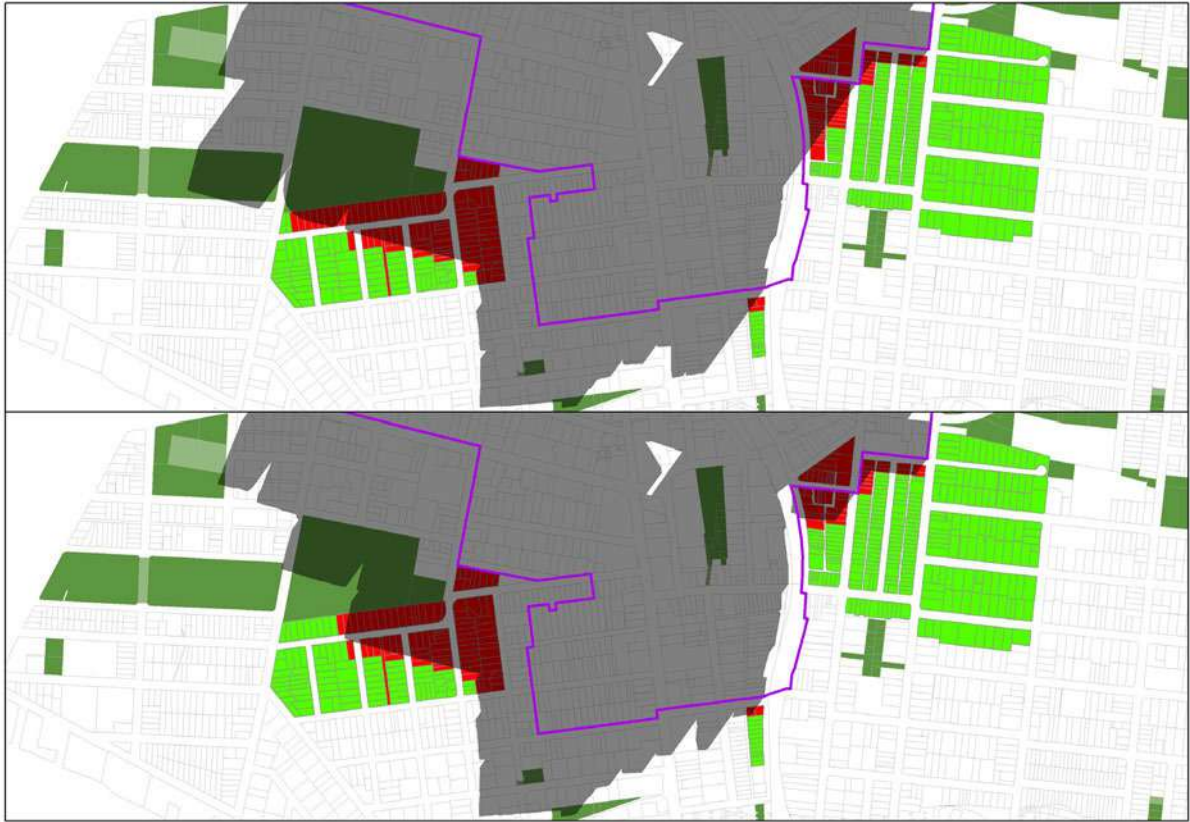


Figure 83 - Comparison of overshadowing between the Incentive Height of Buildings control in the CBD Planning Proposal (top) and the proposed revisions to the Incentive Height of Buildings control (bottom) - 21 June - 9:30am

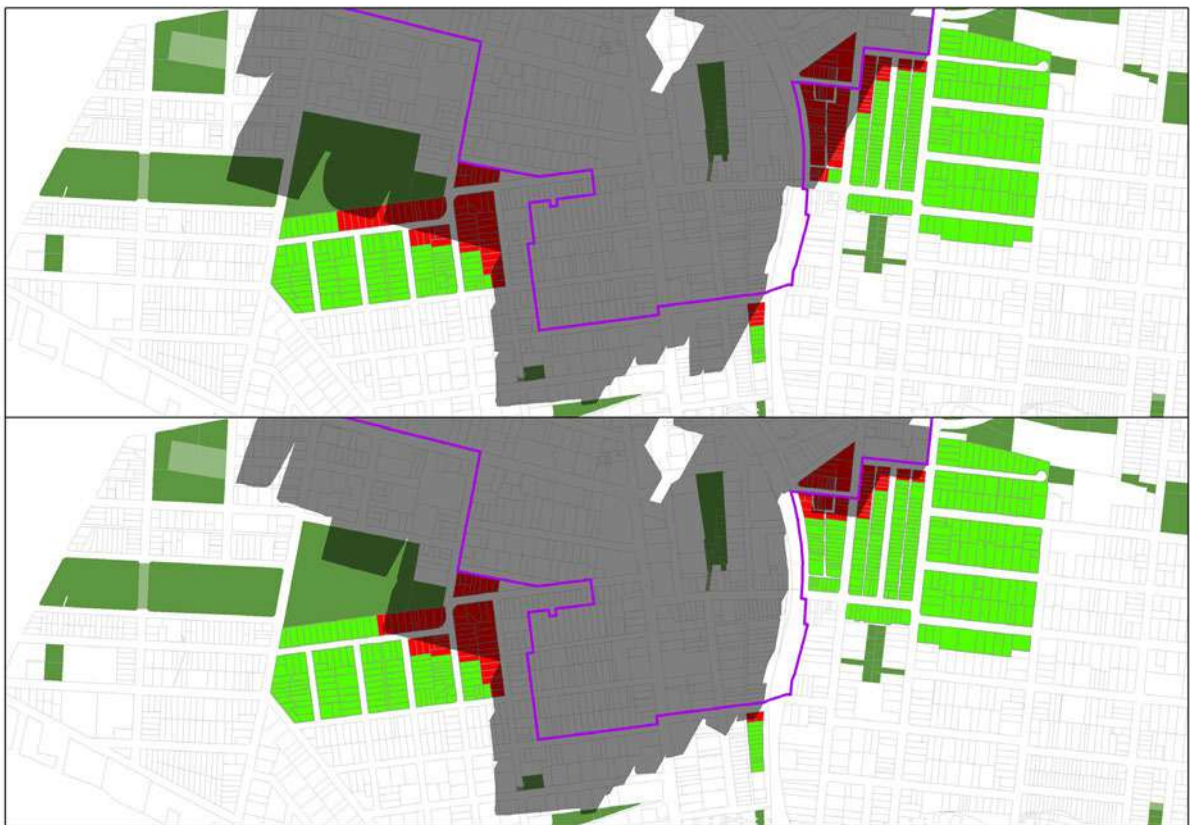


Figure 84 - Comparison of overshadowing between the Incentive Height of Buildings control in the CBD Planning Proposal (top) and the proposed revisions to the Incentive Height of Buildings control (bottom) - 21 June - 10am

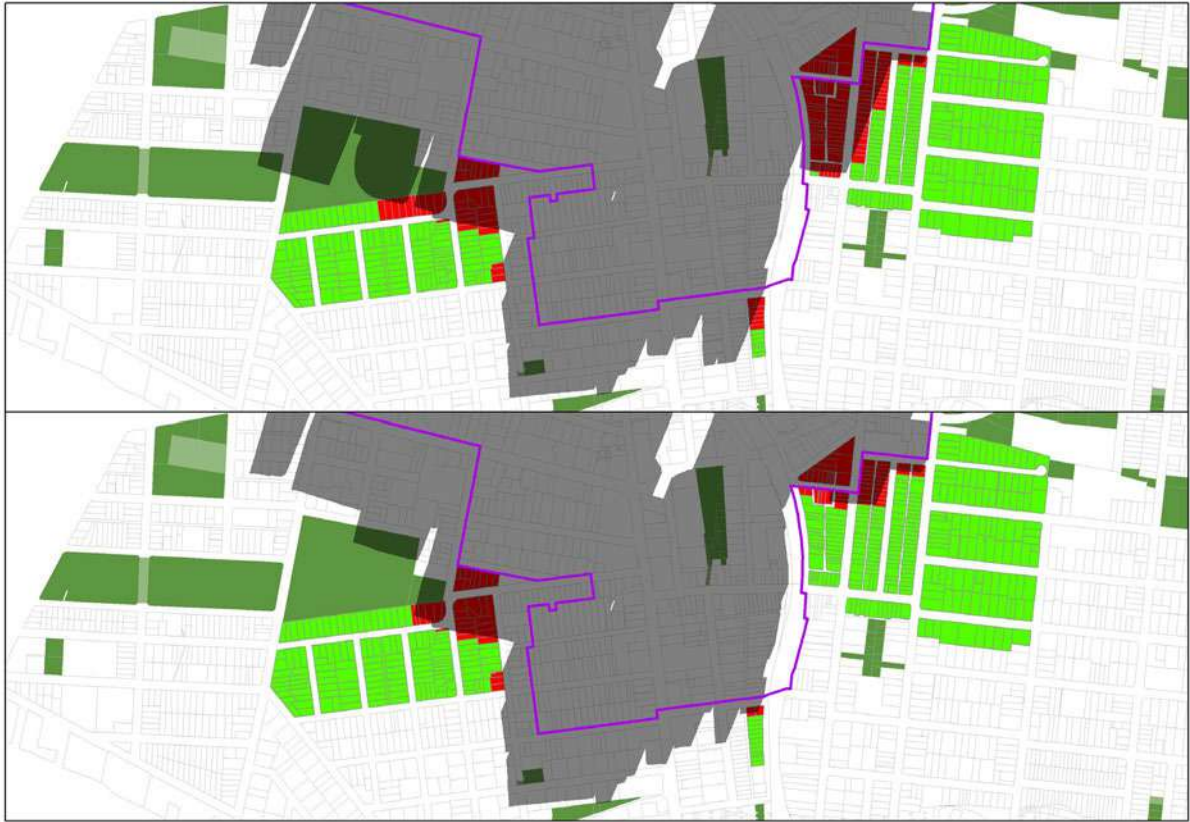


Figure 85 - Comparison of overshadowing between the Incentive Height of Buildings control in the CBD Planning Proposal (top) and the proposed revisions to the Incentive Height of Buildings control (bottom) - 21 June - 10:30am

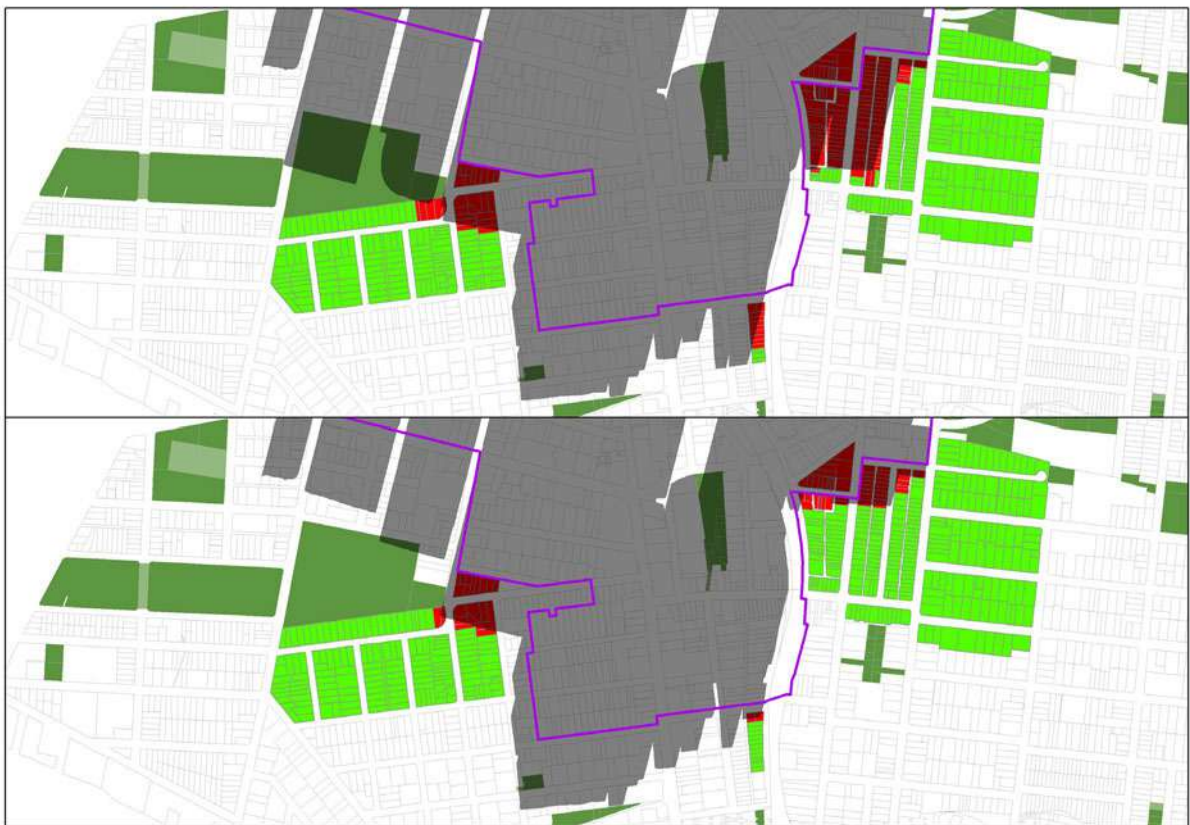


Figure 86 - Comparison of overshadowing between the Incentive Height of Buildings control in the CBD Planning Proposal (top) and the proposed revisions to the Incentive Height of Buildings control (bottom) - 21 June - 11am

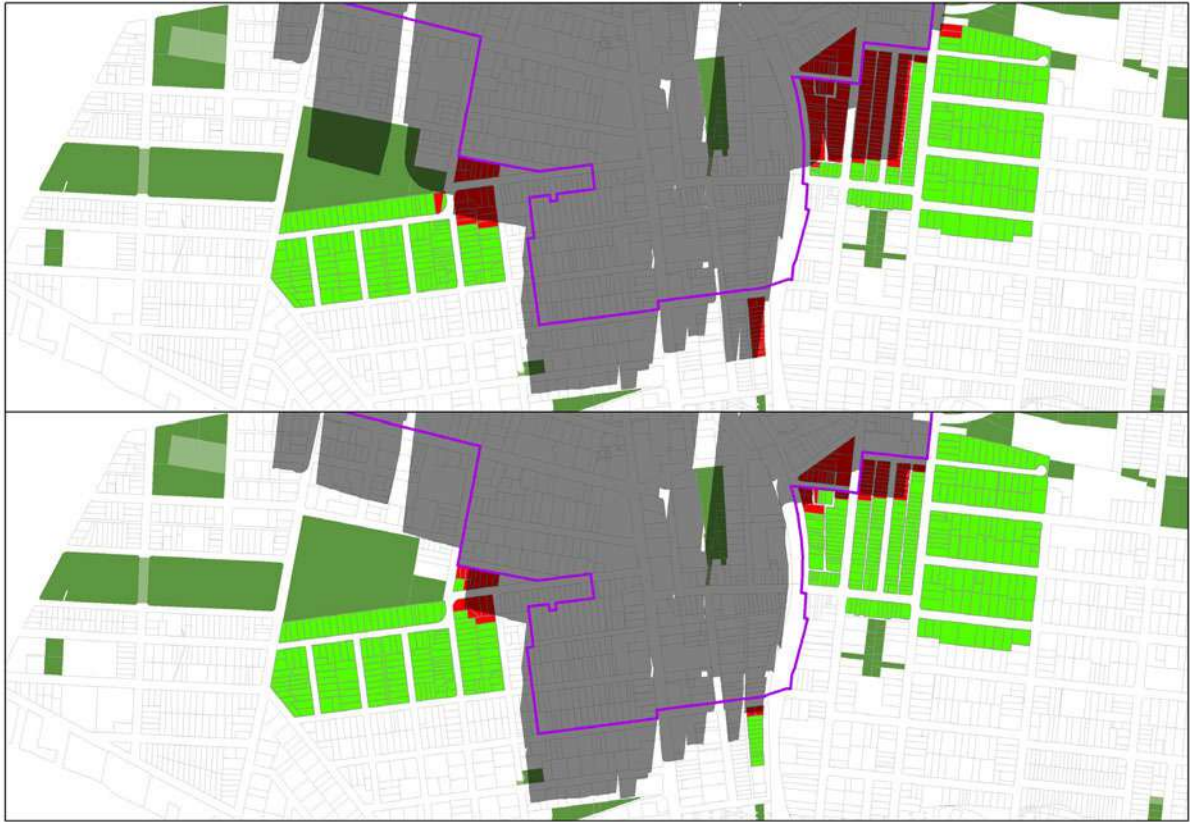


Figure 87 - Comparison of overshadowing between the Incentive Height of Buildings control in the CBD Planning Proposal (top) and the proposed revisions to the Incentive Height of Buildings control (bottom) - 21 June - 11:30am

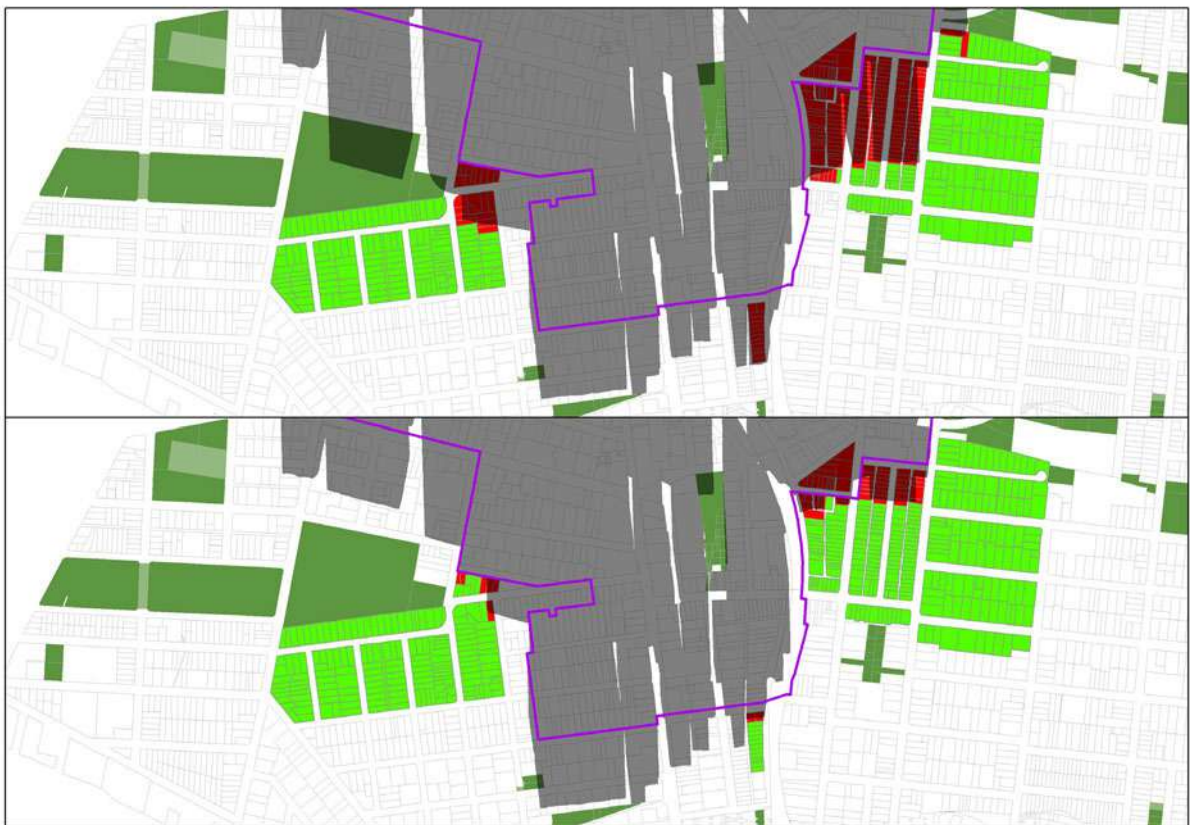


Figure 88 - Comparison of overshadowing between the Incentive Height of Buildings control in the CBD Planning Proposal (top) and the proposed revisions to the Incentive Height of Buildings control (bottom) - 21 June - 12:noon



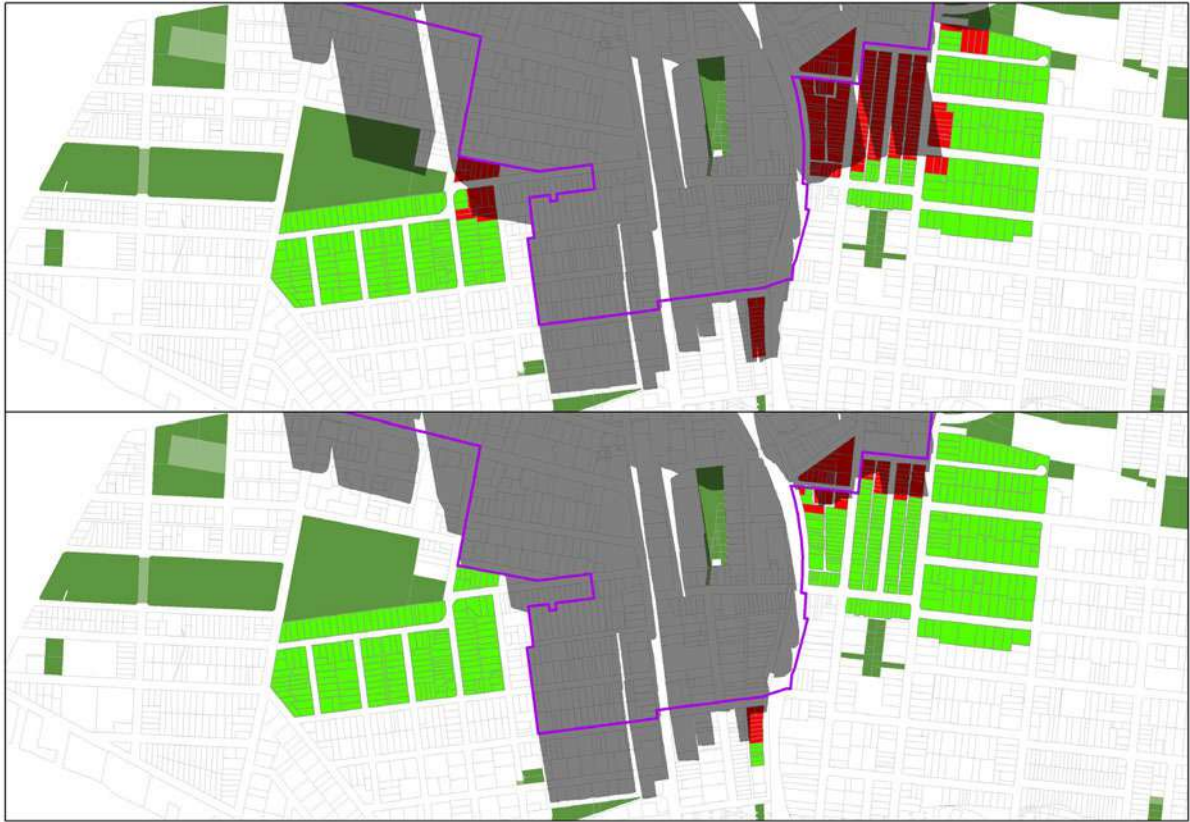


Figure 89 - Comparison of overshadowing between the Incentive Height of Buildings control in the CBD Planning Proposal (top) and the proposed revisions to the Incentive Height of Buildings control (bottom) - 21 June - 12:30pm

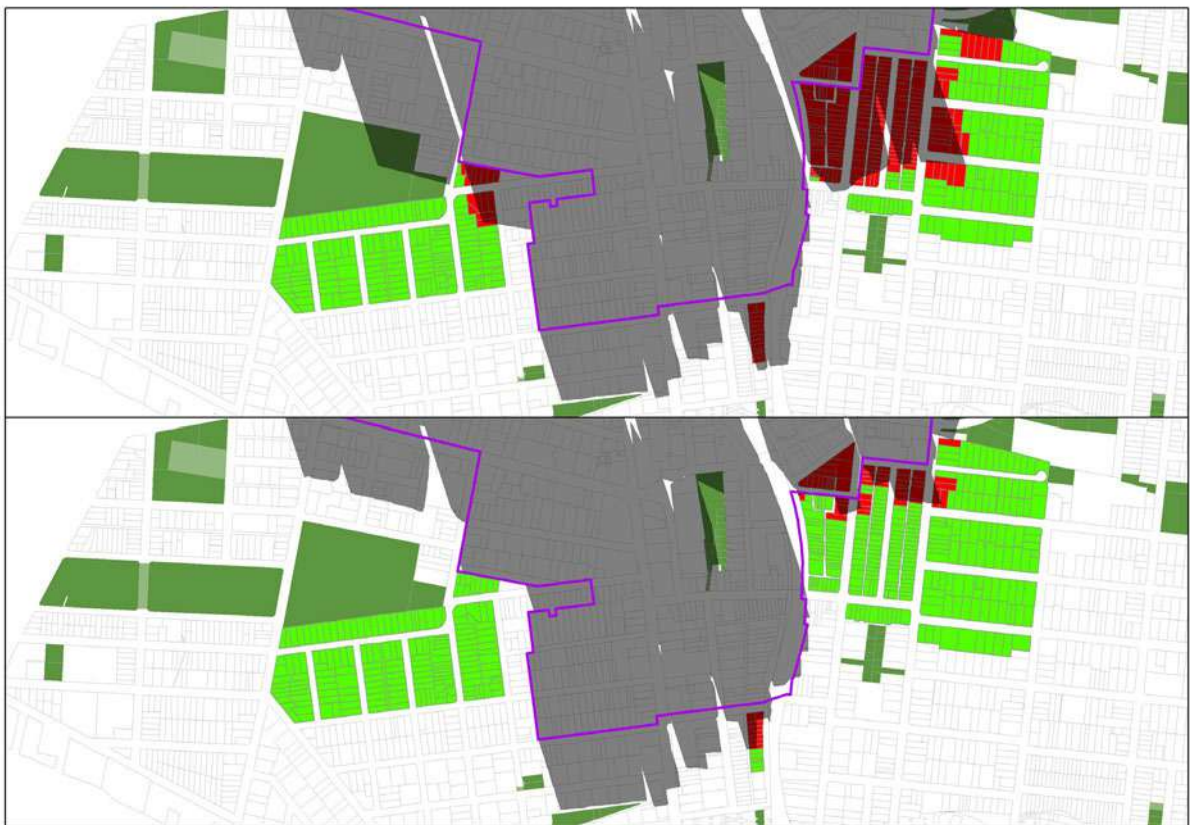


Figure 90 - Comparison of overshadowing between the Incentive Height of Buildings control in the CBD Planning Proposal (top) and the proposed revisions to the Incentive Height of Buildings control (bottom) - 21 June - 1pm

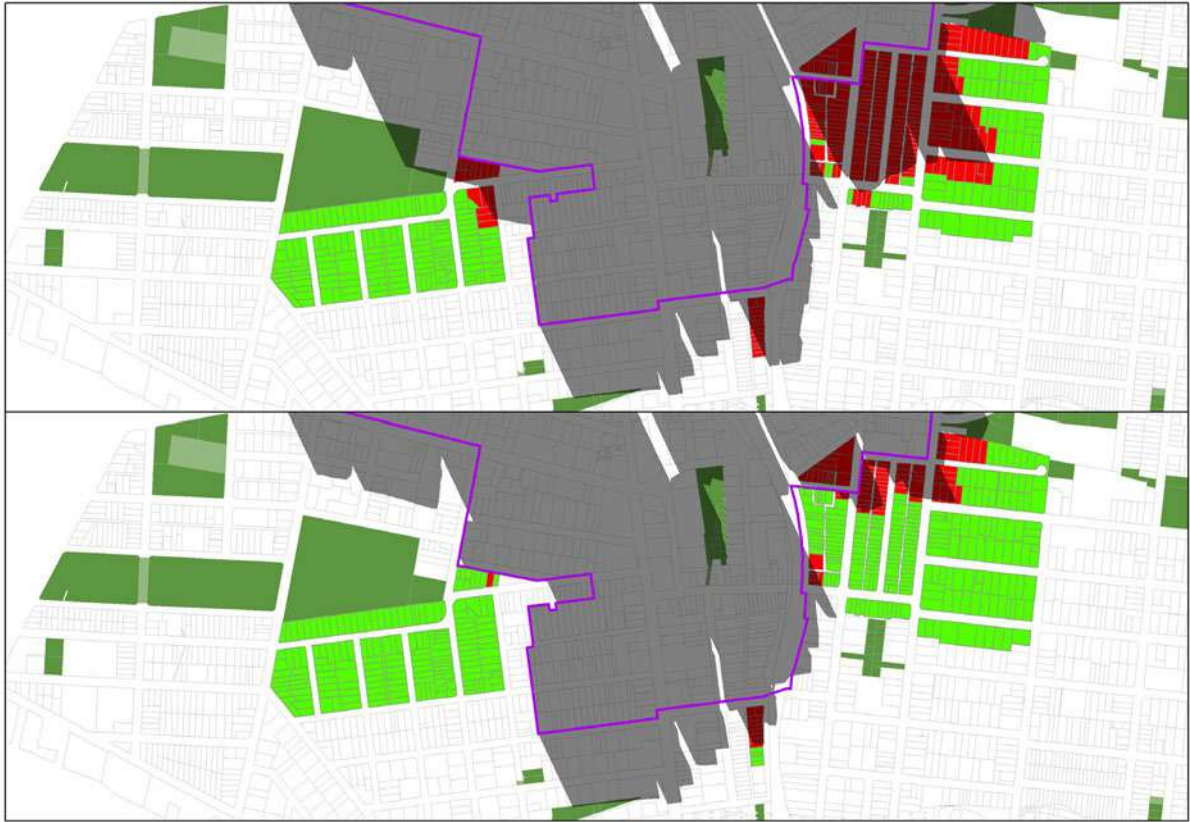


Figure 91 - Comparison of overshadowing between the Incentive Height of Buildings control in the CBD Planning Proposal (top) and the proposed revisions to the Incentive Height of Buildings control (bottom) - 21 June - 1:30pm

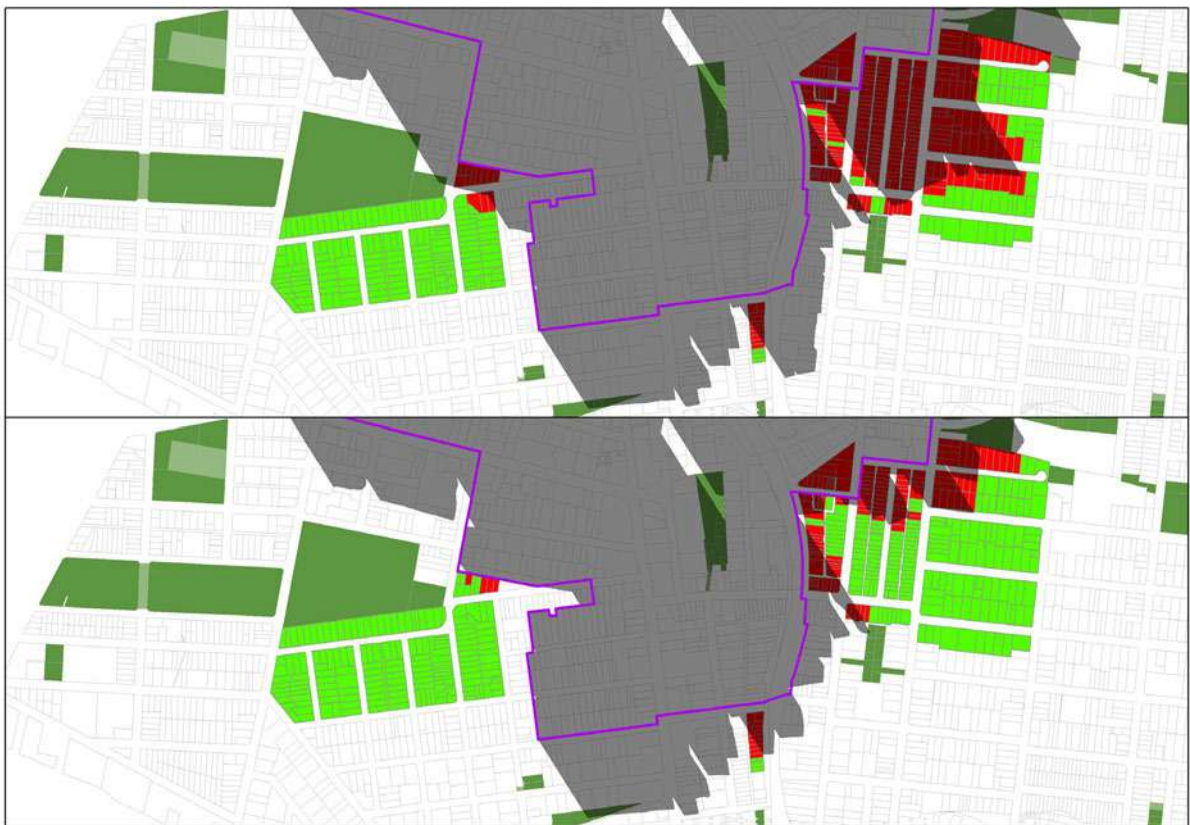


Figure 92 - Comparison of overshadowing between the Incentive Height of Buildings control in the CBD Planning Proposal (top) and the proposed revisions to the Incentive Height of Buildings control (bottom) - 21 June - 2pm

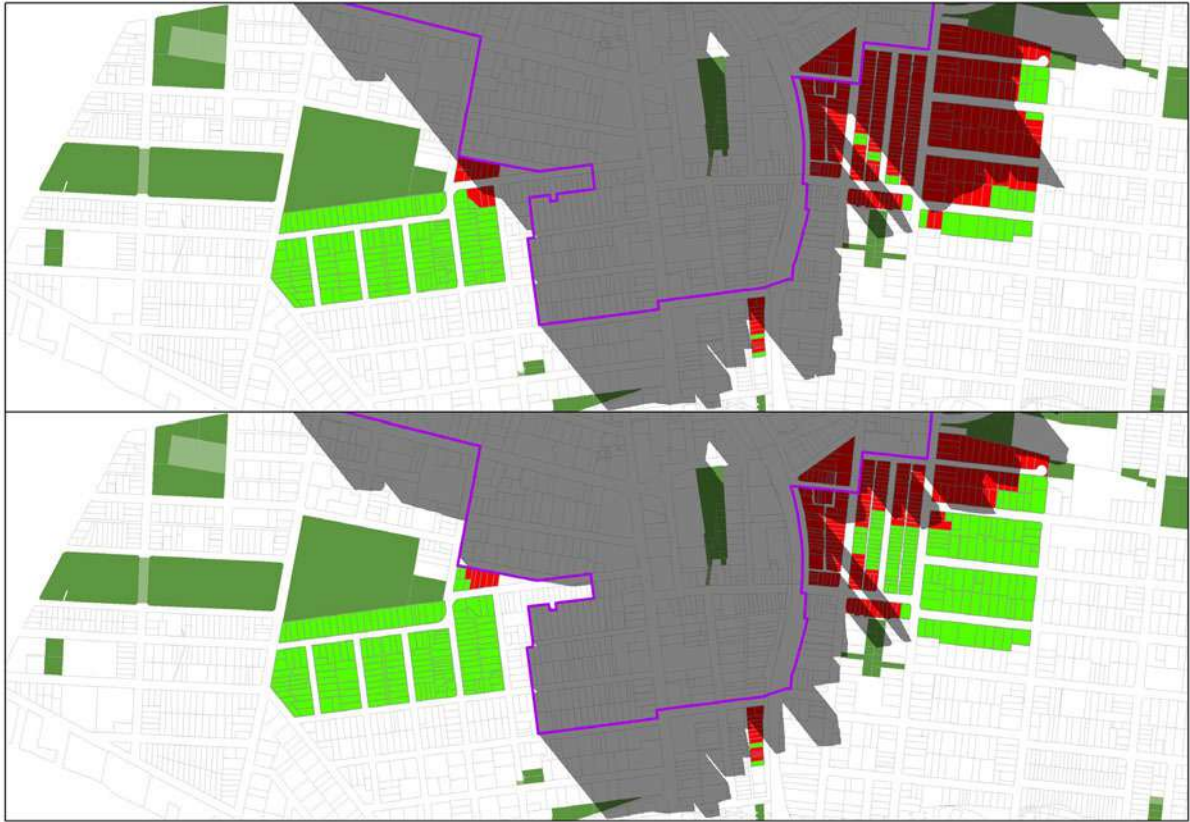


Figure 93 - Comparison of overshadowing between the Incentive Height of Buildings control in the CBD Planning Proposal (top) and the proposed revisions to the Incentive Height of Buildings control (bottom) - 21 June - 2:30pm

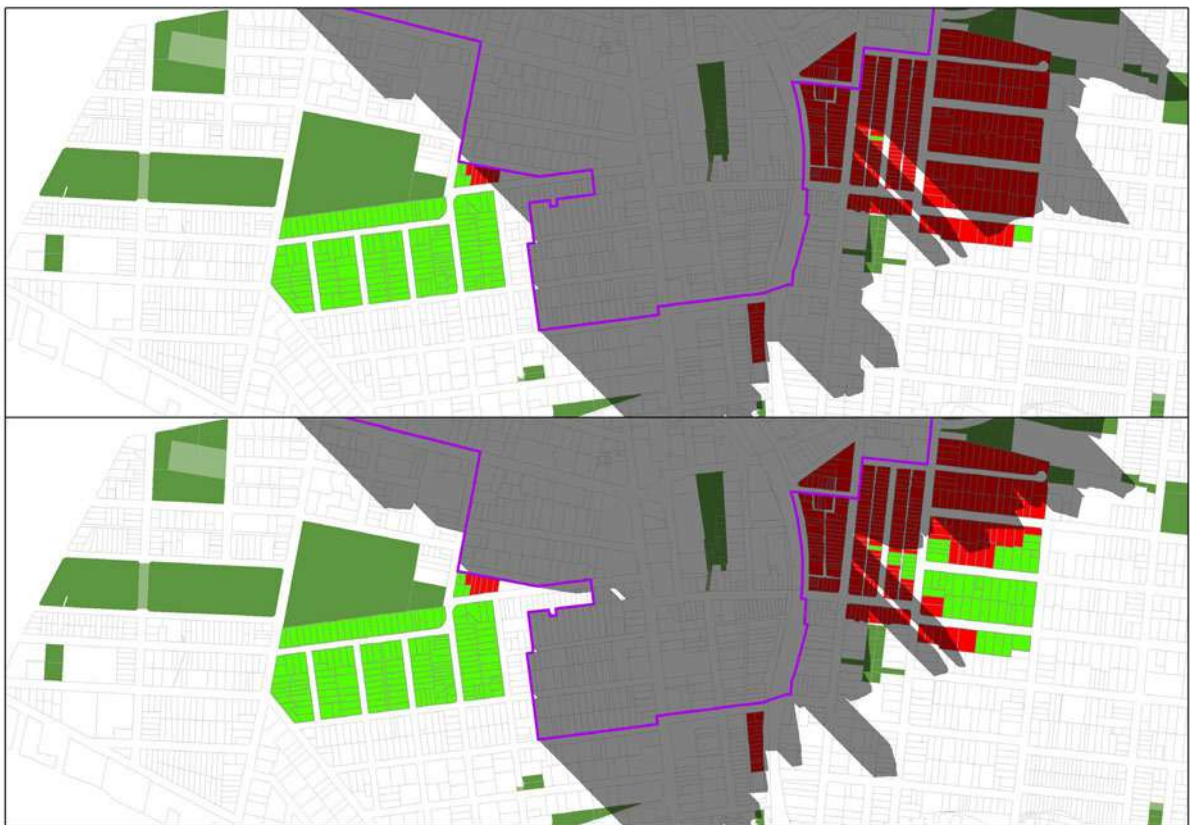


Figure 94 - Comparison of overshadowing between the Incentive Height of Buildings control in the CBD Planning Proposal (top) and the proposed revisions to the Incentive Height of Buildings control (bottom) - 21 June - 3pm

# Appendix 5 – Overshadowing of Public Open Space areas

This Appendix contains the comparative shadow analysis for the ten public open spaces identified generally to the south of the Parramatta CBD. This analysis models the overshadowing for the current Height of Buildings controls (light grey) against the proposed Incentive Height of Buildings controls (dark grey) at 30-minute intervals between 9am and 3pm on 21 June.

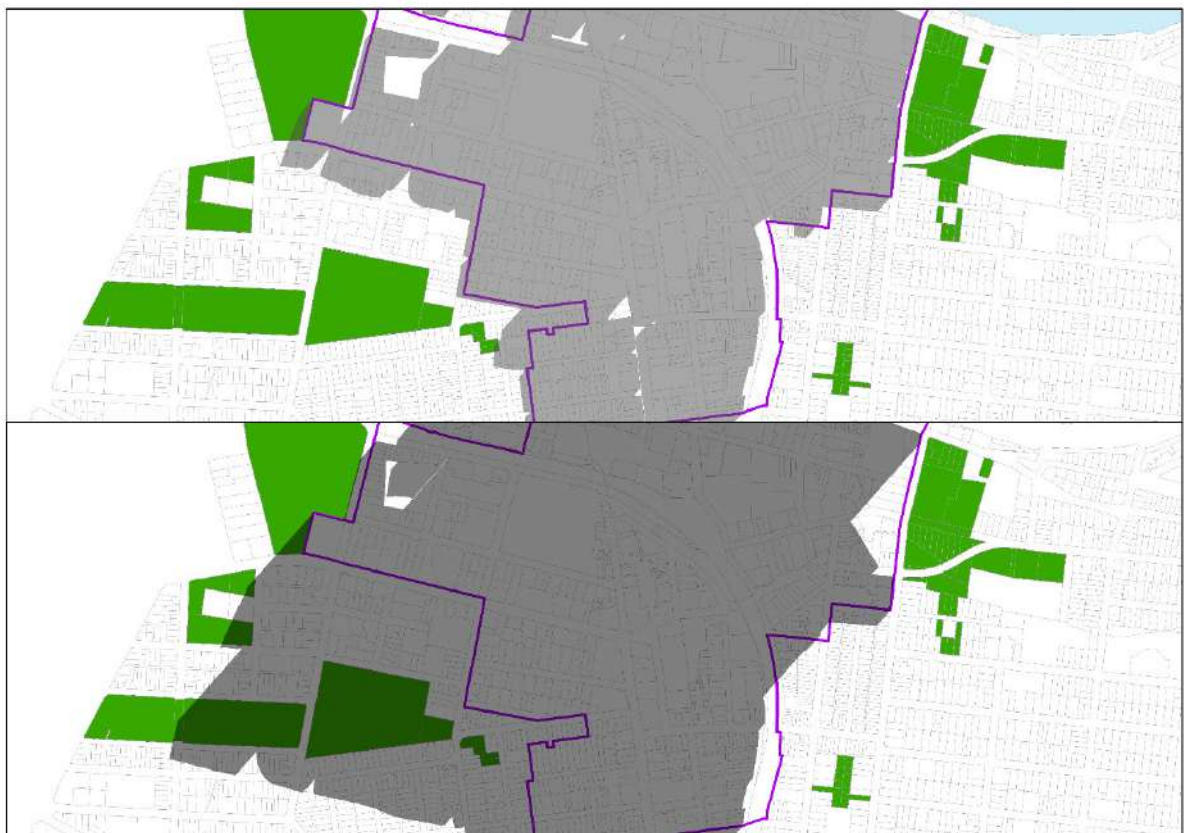


Figure 95 - Comparison of overshadowing between the current controls within Parramatta Local Environmental Plan 2011 (top) and the Incentive Height of Buildings controls for the CBD Planning Proposal (bottom) – 21 June – 9am

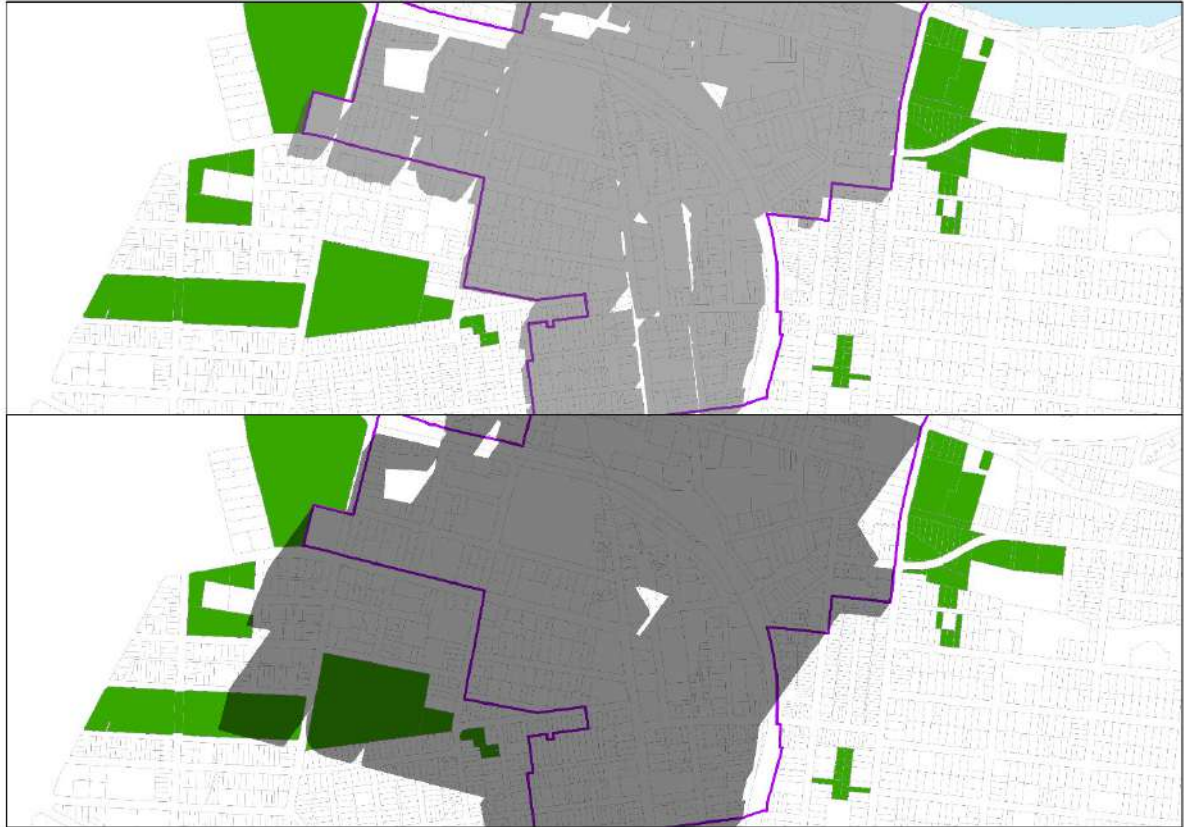


Figure 96 - Comparison of overshadowing between the current controls within Parramatta Local Environmental Plan 2011 (top) and the Incentive Height of Buildings controls for the CBD Planning Proposal (bottom) – 21 June – 9:30am

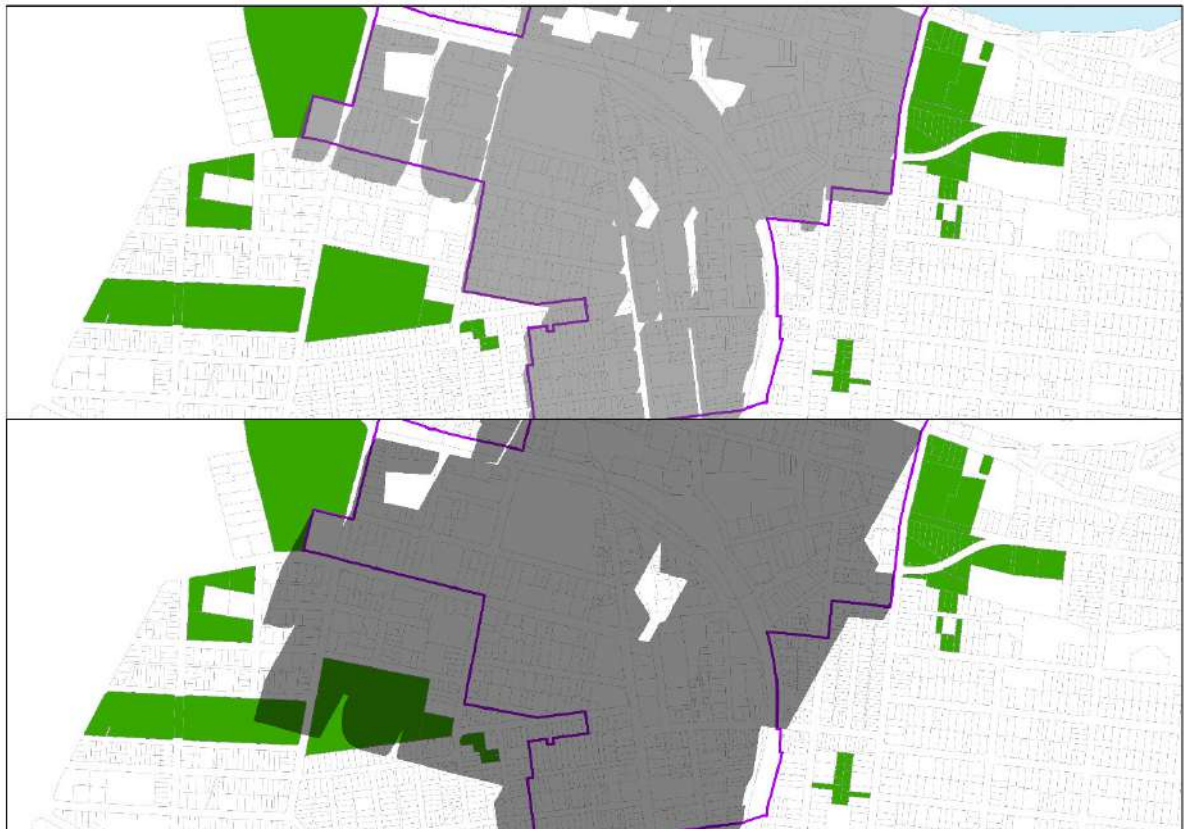


Figure 97 - Comparison of overshadowing between the current controls within Parramatta Local Environmental Plan 2011 (top) and the Incentive Height of Buildings controls for the CBD Planning Proposal (bottom) – 21 June – 10am

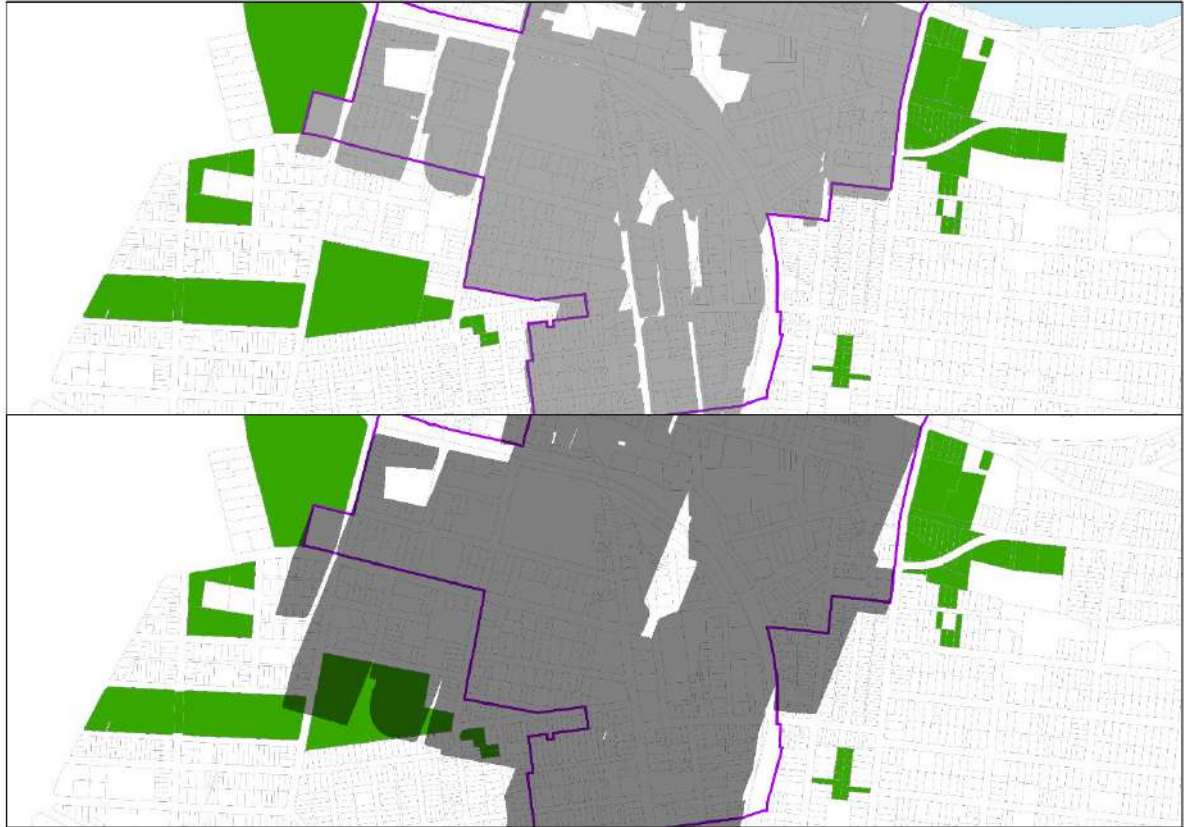


Figure 98 - Comparison of overshadowing between the current controls within Parramatta Local Environmental Plan 2011 (top) and the Incentive Height of Buildings controls for the CBD Planning Proposal (bottom) – 21 June – 10:30am

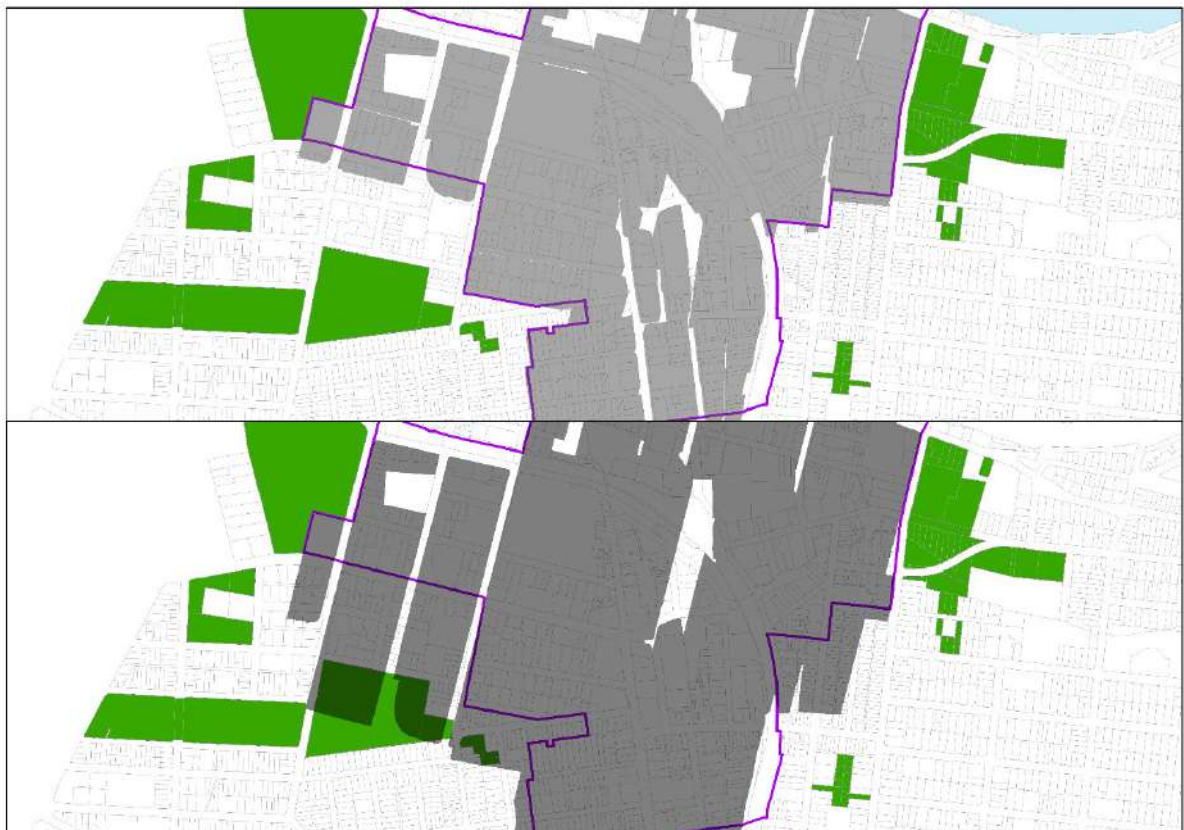


Figure 99 - Comparison of overshadowing between the current controls within Parramatta Local Environmental Plan 2011 (top) and the Incentive Height of Buildings controls for the CBD Planning Proposal (bottom) – 21 June – 11am

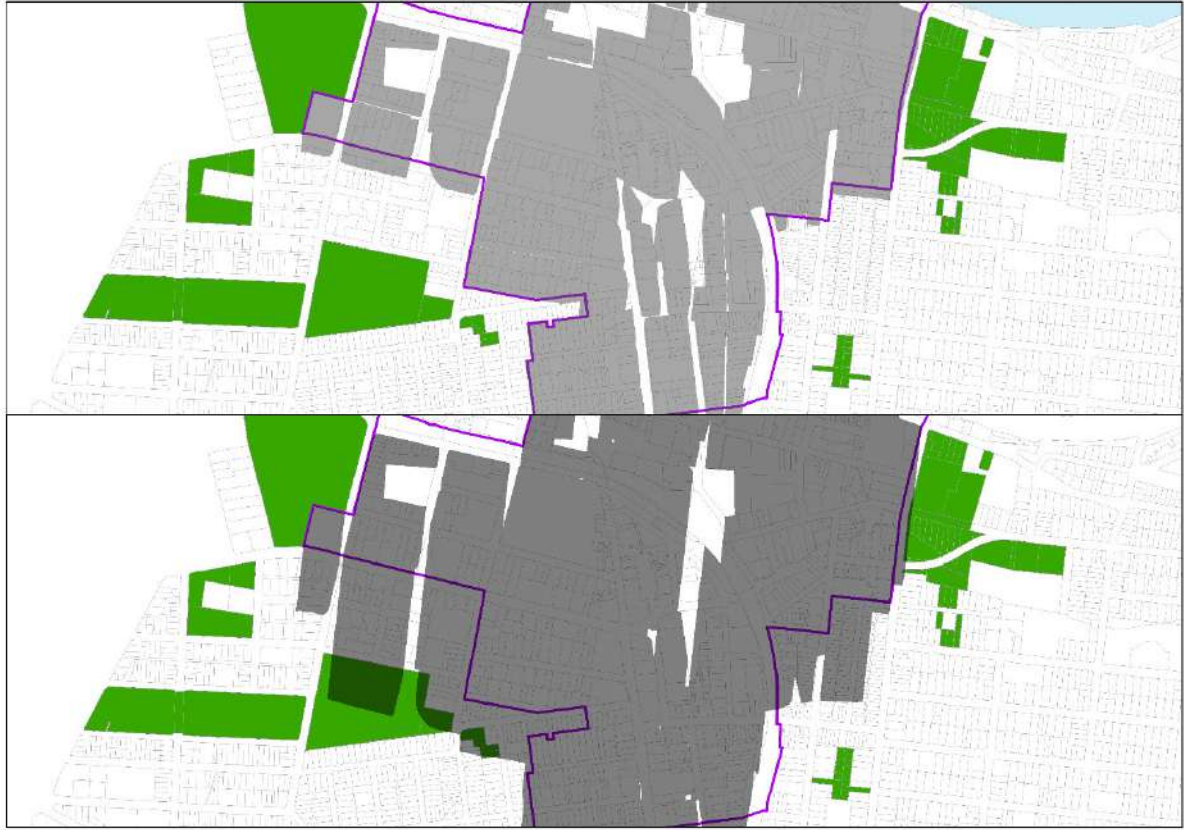


Figure 100 - Comparison of overshadowing between the current controls within Parramatta Local Environmental Plan 2011 (top) and the Incentive Height of Buildings controls for the CBD Planning Proposal (bottom) – 21 June – 11:30am

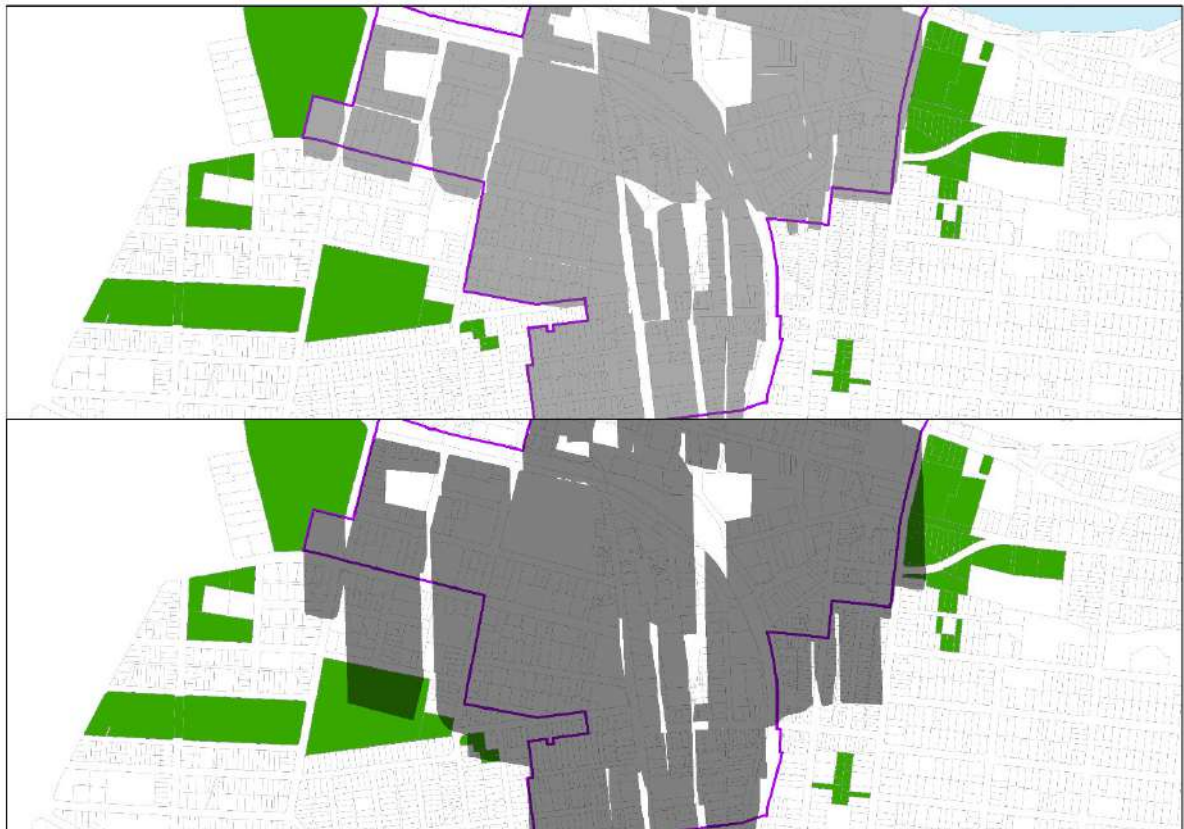


Figure 101 - Comparison of overshadowing between the current controls within Parramatta Local Environmental Plan 2011 (top) and the Incentive Height of Buildings controls for the CBD Planning Proposal (bottom) – 21 June – 12:noon

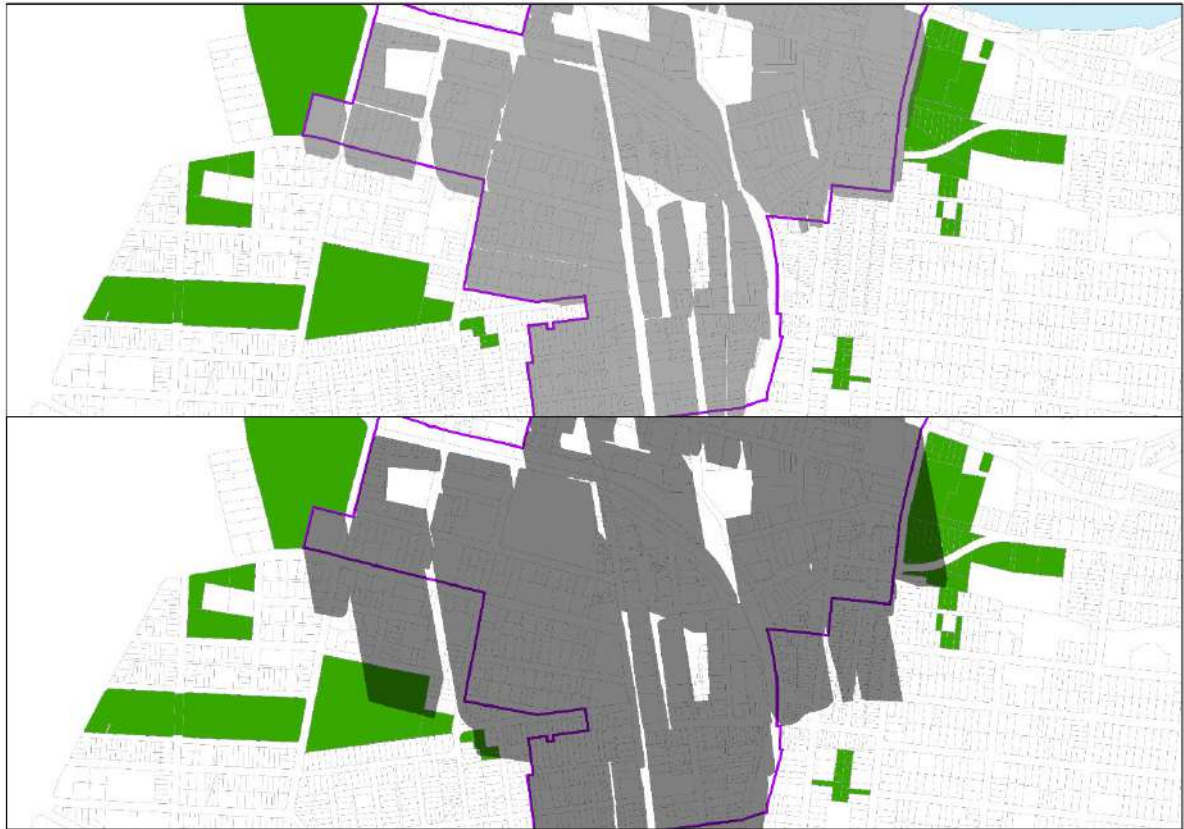


Figure 102 - Comparison of overshadowing between the current controls within Parramatta Local Environmental Plan 2011 (top) and the Incentive Height of Buildings controls for the CBD Planning Proposal (bottom) – 21 June – 12:30pm

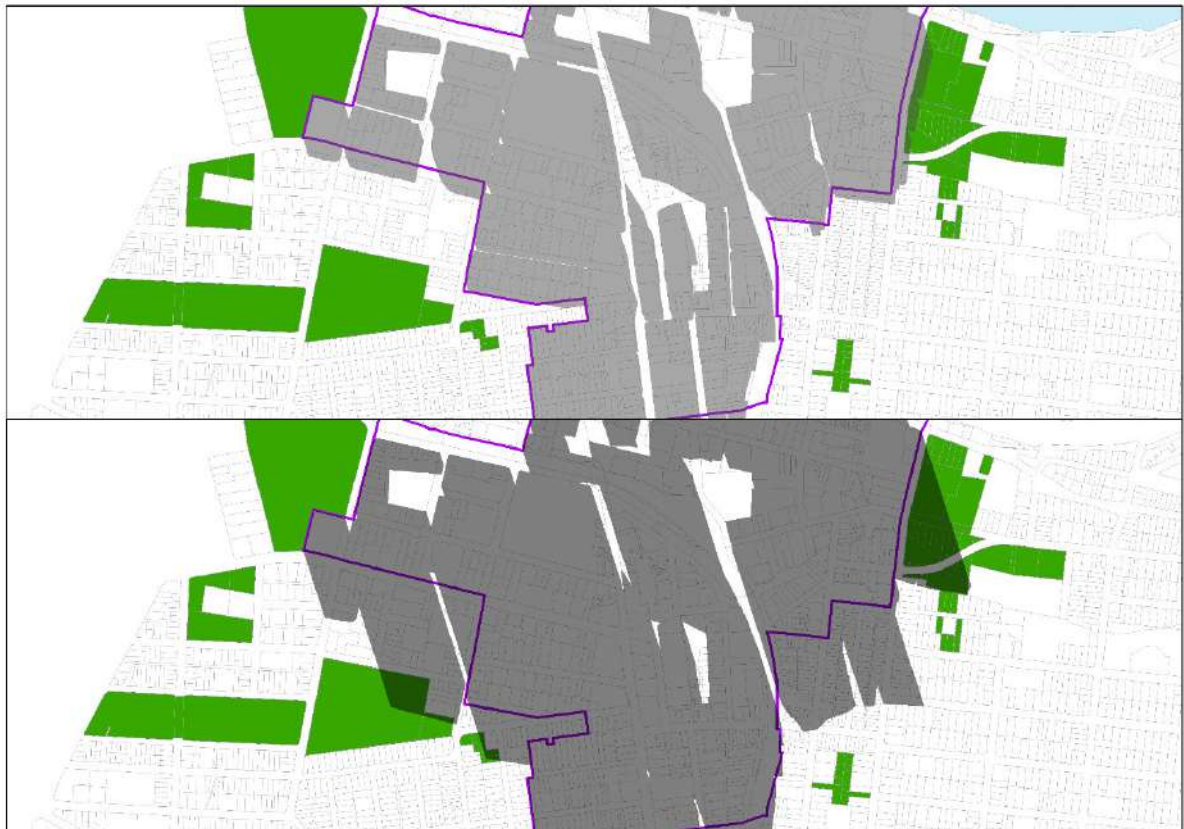


Figure 103 - Comparison of overshadowing between the current controls within Parramatta Local Environmental Plan 2011 (top) and the Incentive Height of Buildings controls for the CBD Planning Proposal (bottom) – 21 June – 1pm



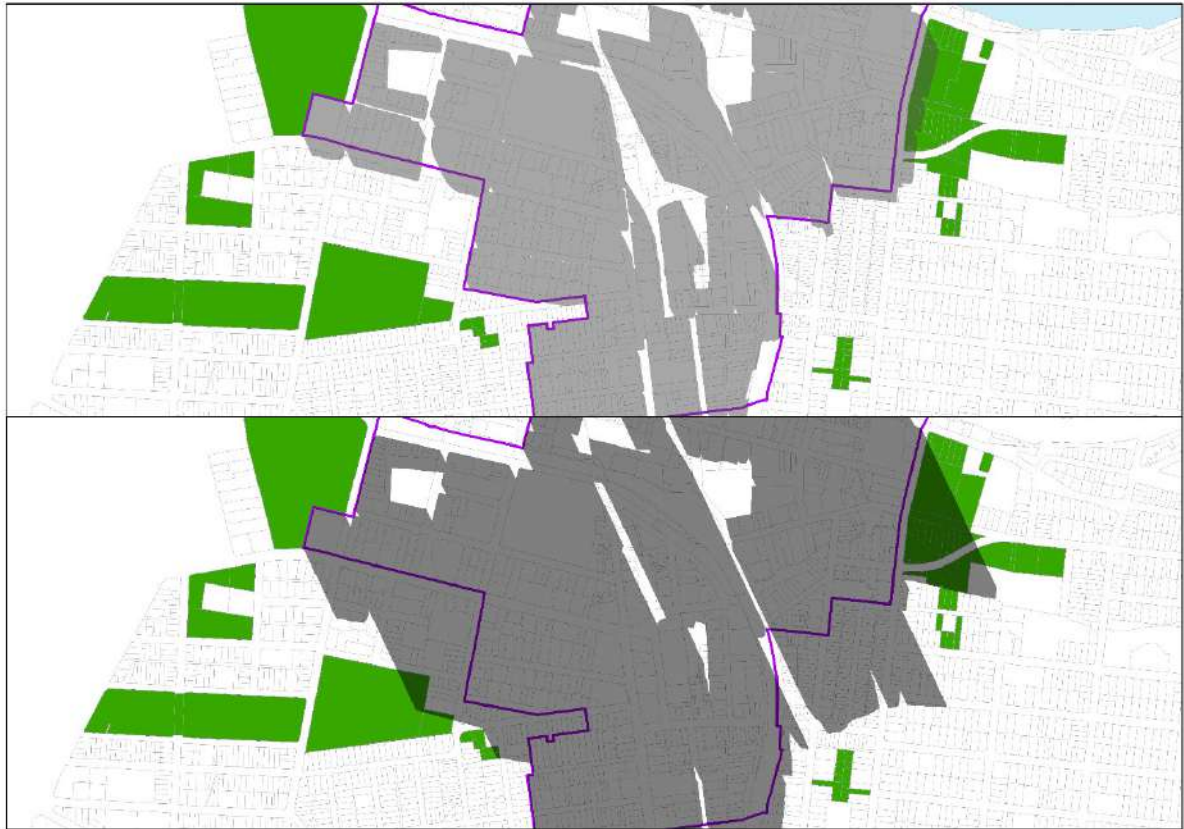


Figure 104 - Comparison of overshadowing between the current controls within Parramatta Local Environmental Plan 2011 (top) and the Incentive Height of Buildings controls for the CBD Planning Proposal (bottom) – 21 June – 1:30pm

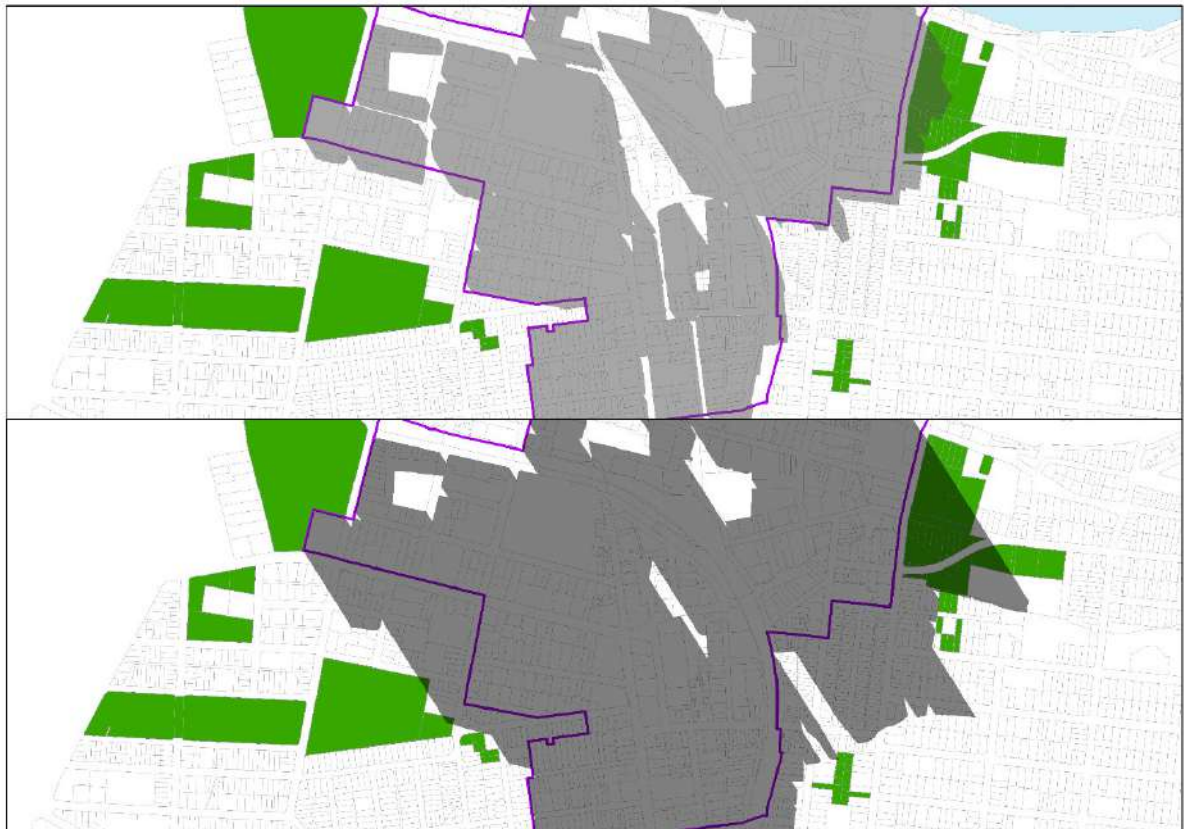


Figure 105 - Comparison of overshadowing between the current controls within Parramatta Local Environmental Plan 2011 (top) and the Incentive Height of Buildings controls for the CBD Planning Proposal (bottom) – 21 June – 2pm

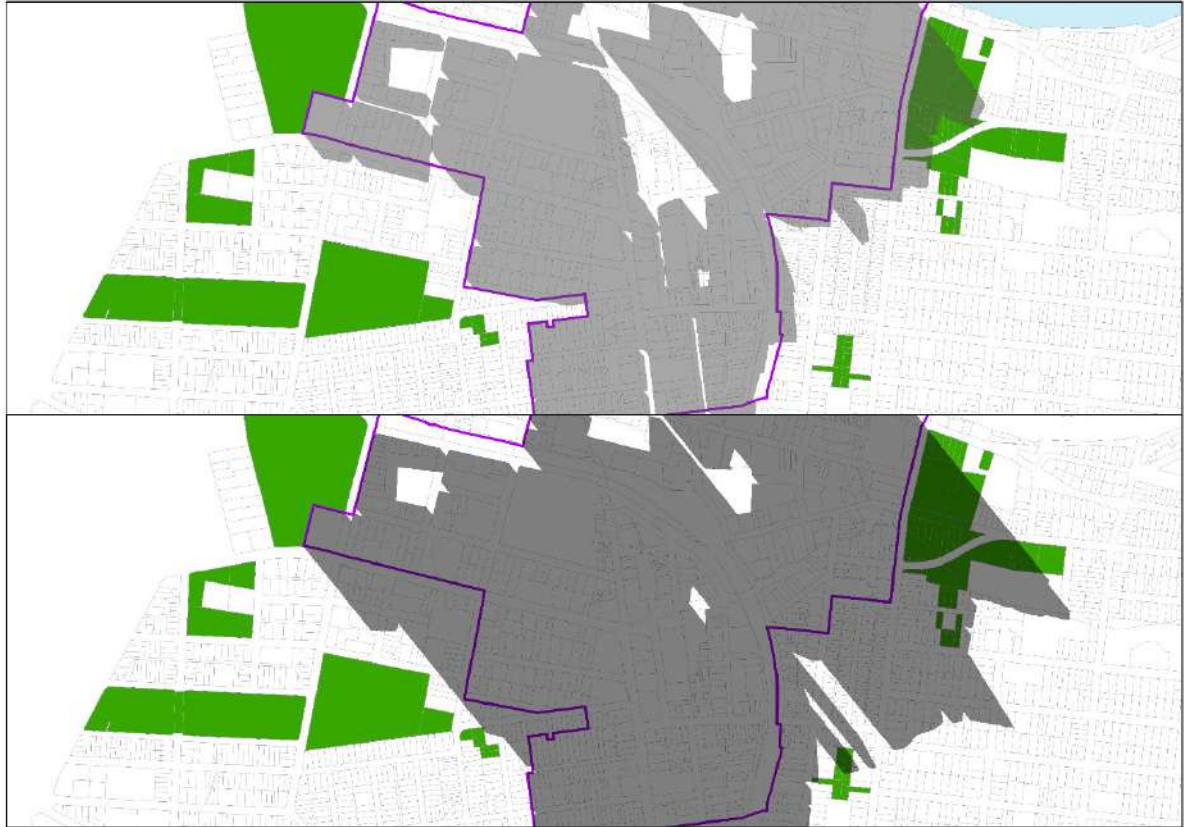


Figure 106 - Comparison of overshadowing between the current controls within Parramatta Local Environmental Plan 2011 (top) and the Incentive Height of Buildings controls for the CBD Planning Proposal (bottom) – 21 June – 2:30pm

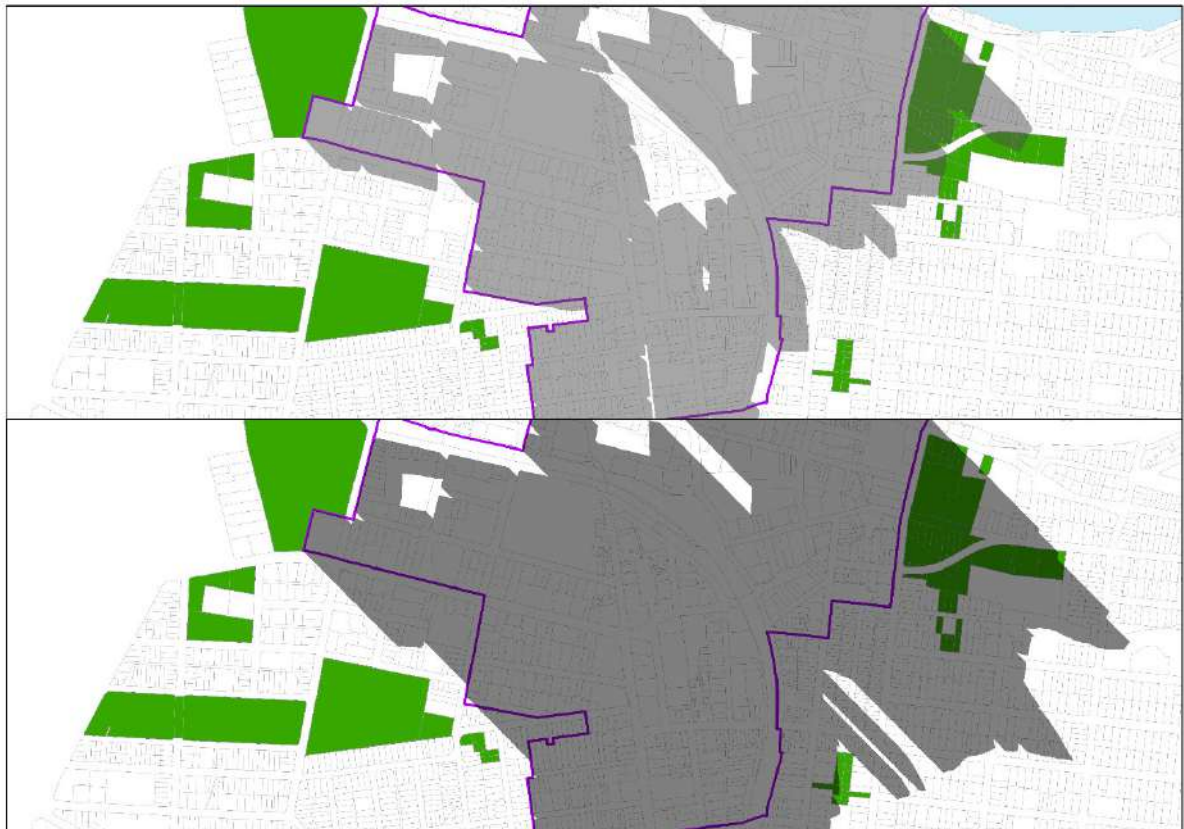


Figure 107 - Comparison of overshadowing between the current controls within Parramatta Local Environmental Plan 2011 (top) and the Incentive Height of Buildings controls for the CBD Planning Proposal (bottom) – 21 June – 3pm

# Appendix 6 – Overshadowing of Public Open Space areas with revised Incentive Height of Buildings controls

This Appendix contains the comparative shadow analysis for the ten public open spaces to the south of the Parramatta CBD. This analysis models the overshadowing for the Incentive Height of Buildings controls (top row) within the CBD Planning Proposal against the revised Incentive Height of Buildings controls (bottom row) at 30-minute intervals between 9am and 3pm on 21 June.

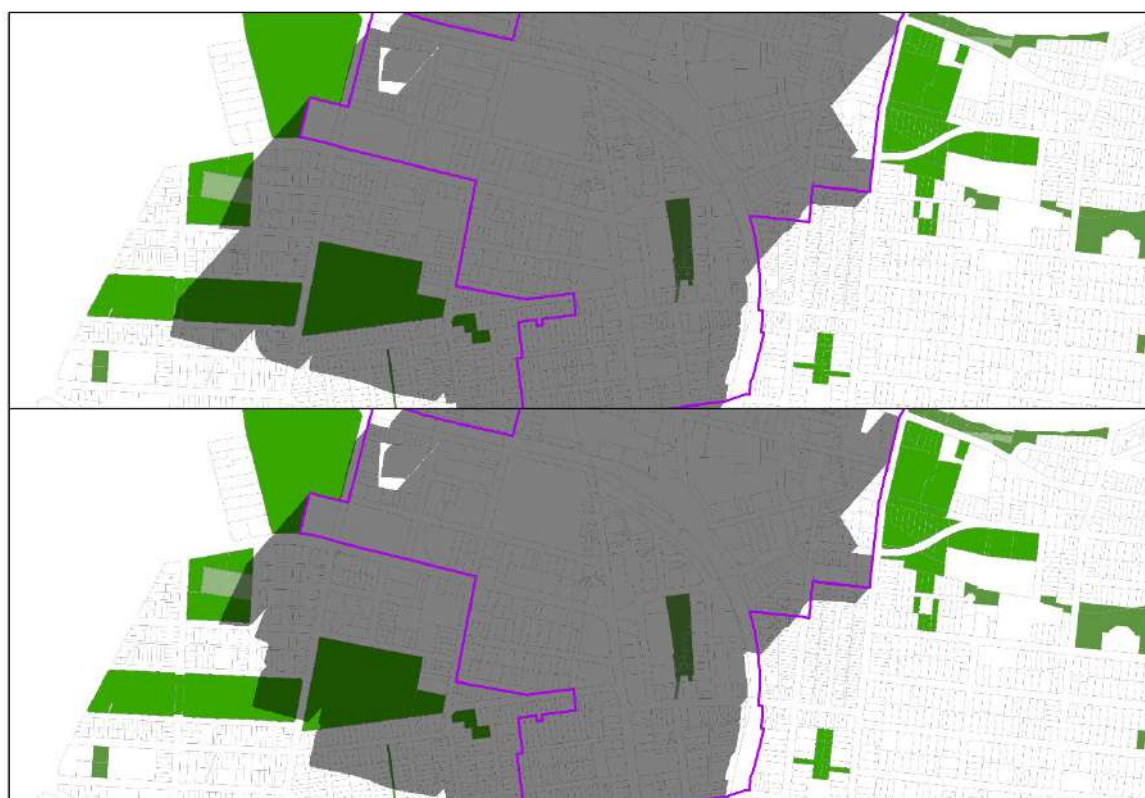


Figure 108 - Comparison of overshadowing between the Incentive Height of Buildings control for the CBD Planning Proposal (top) and the Incentive Height of Buildings controls for the CBD Planning Proposal after revisions have been made to improve sunlight access to heritage conservation areas and public open spaces (bottom) – 21 June – 9am

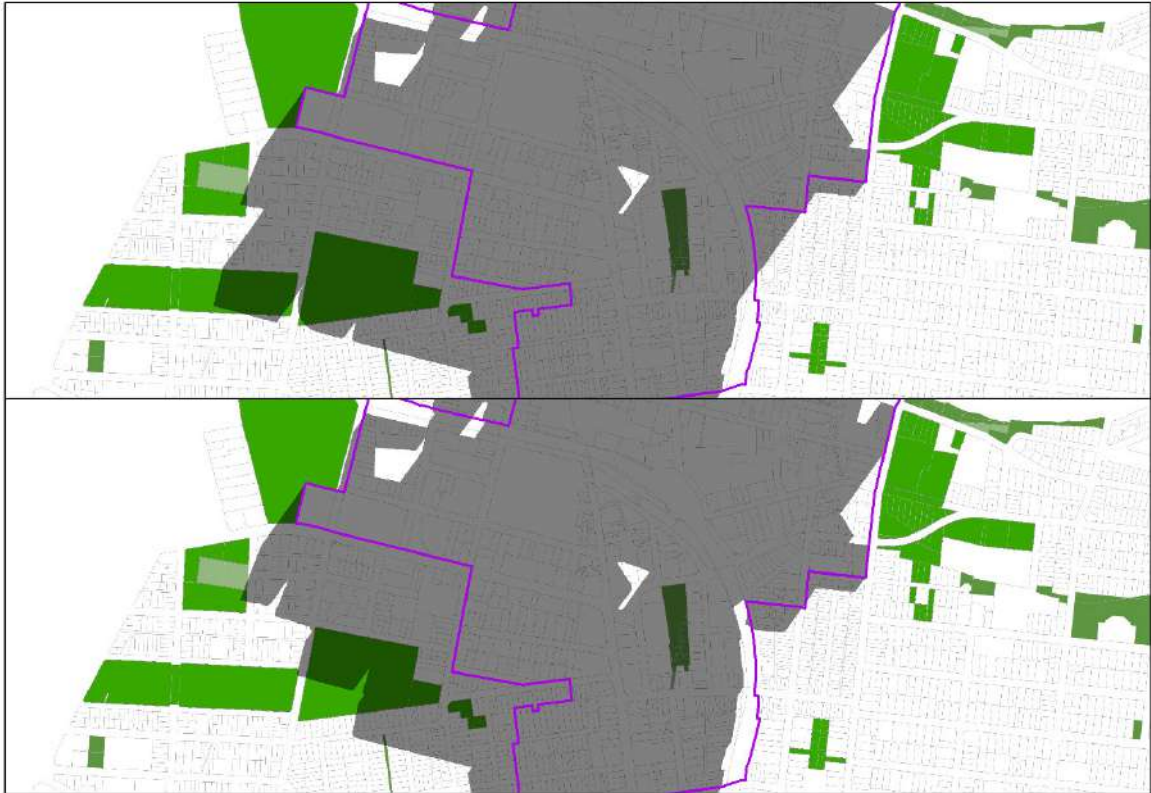


Figure 109 - Comparison of overshadowing between the Incentive Height of Buildings control for the CBD Planning Proposal (top) and the Incentive Height of Buildings controls for the CBD Planning Proposal after revisions have been made to improve sunlight access to heritage conservation areas and public open spaces (bottom) – 21 June – 9:30am

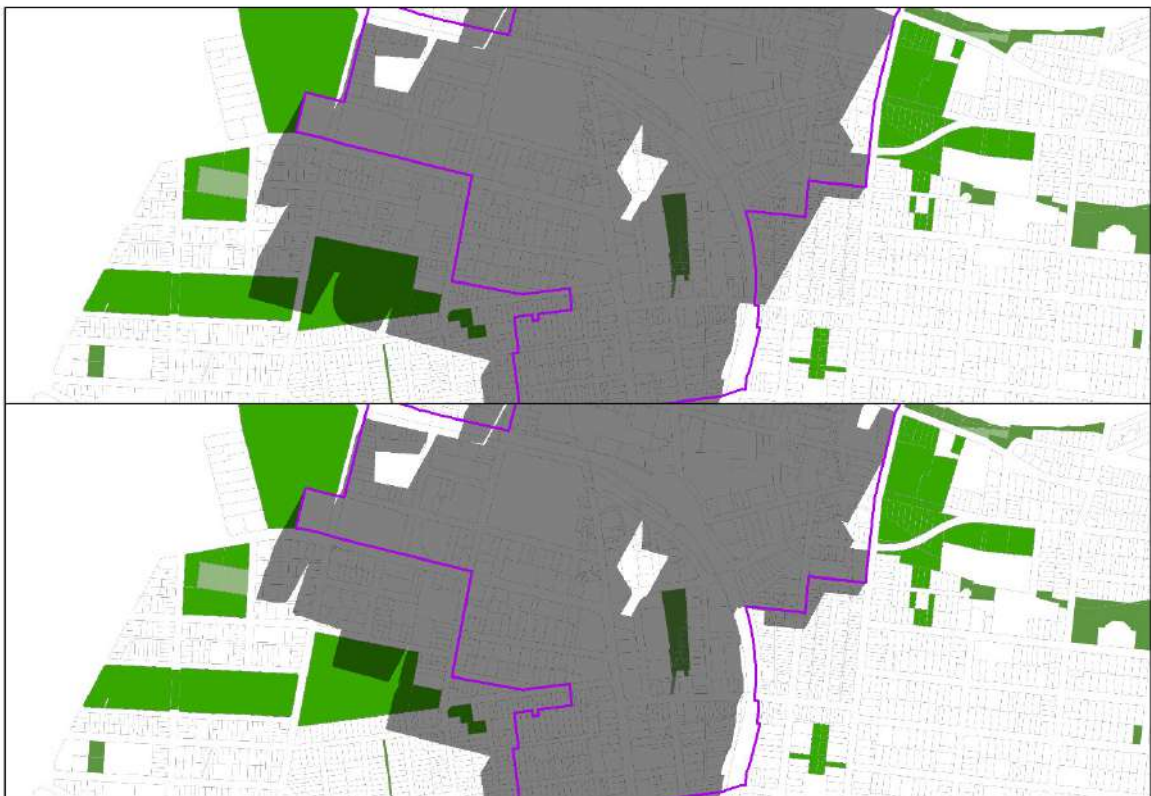


Figure 110 - Comparison of overshadowing between the Incentive Height of Buildings control for the CBD Planning Proposal (top) and the Incentive Height of Buildings controls for the CBD Planning Proposal after revisions have been made to improve sunlight access to heritage conservation areas and public open spaces (bottom) – 21 June – 10am

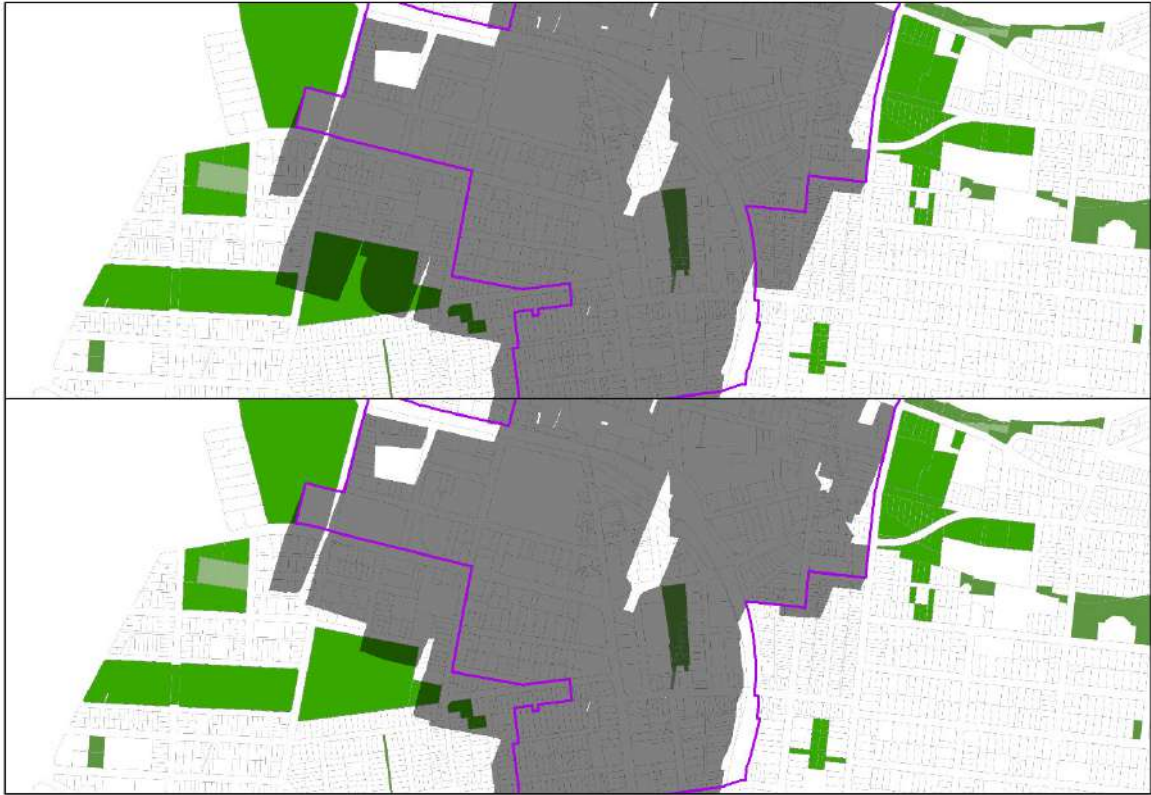


Figure 111 - Comparison of overshadowing between the Incentive Height of Buildings control for the CBD Planning Proposal (top) and the Incentive Height of Buildings controls for the CBD Planning Proposal after revisions have been made to improve sunlight access to heritage conservation areas and public open spaces (bottom) – 21 June – 10:30am

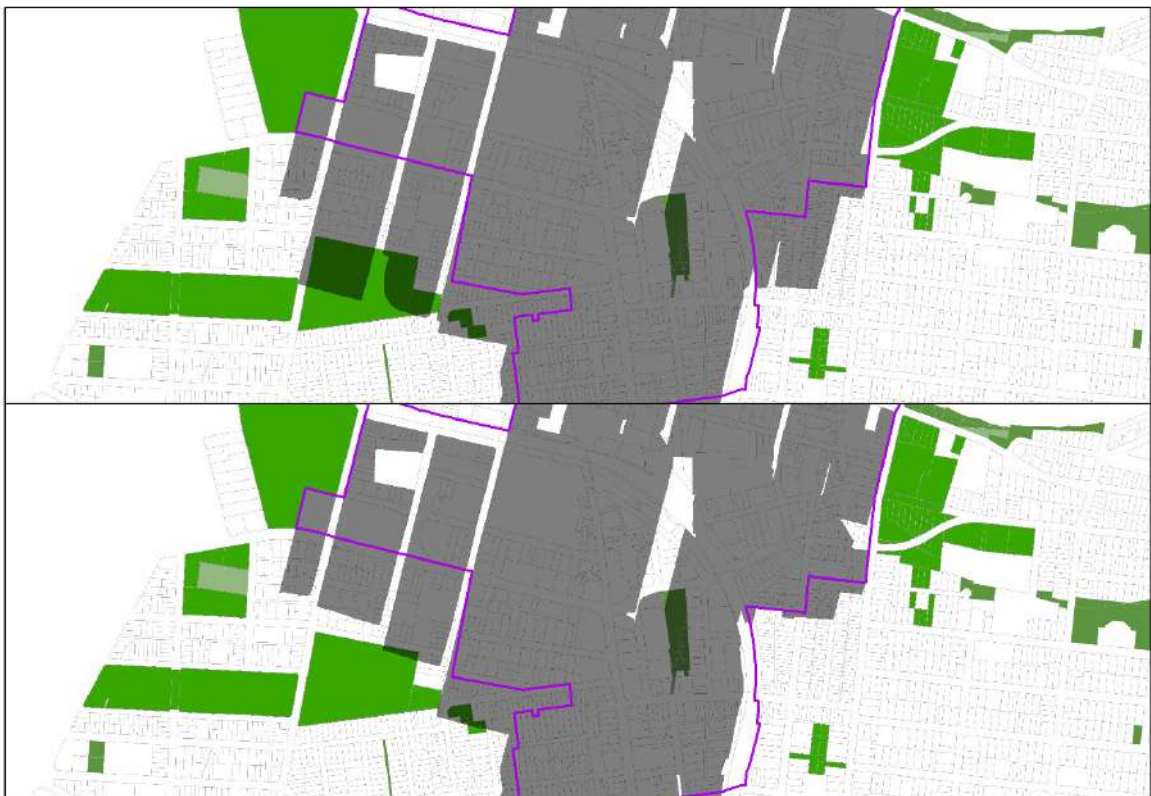


Figure 112 - Comparison of overshadowing between the Incentive Height of Buildings control for the CBD Planning Proposal (top) and the Incentive Height of Buildings controls for the CBD Planning Proposal after revisions have been made to improve sunlight access to heritage conservation areas and public open spaces (bottom) – 21 June – 11am

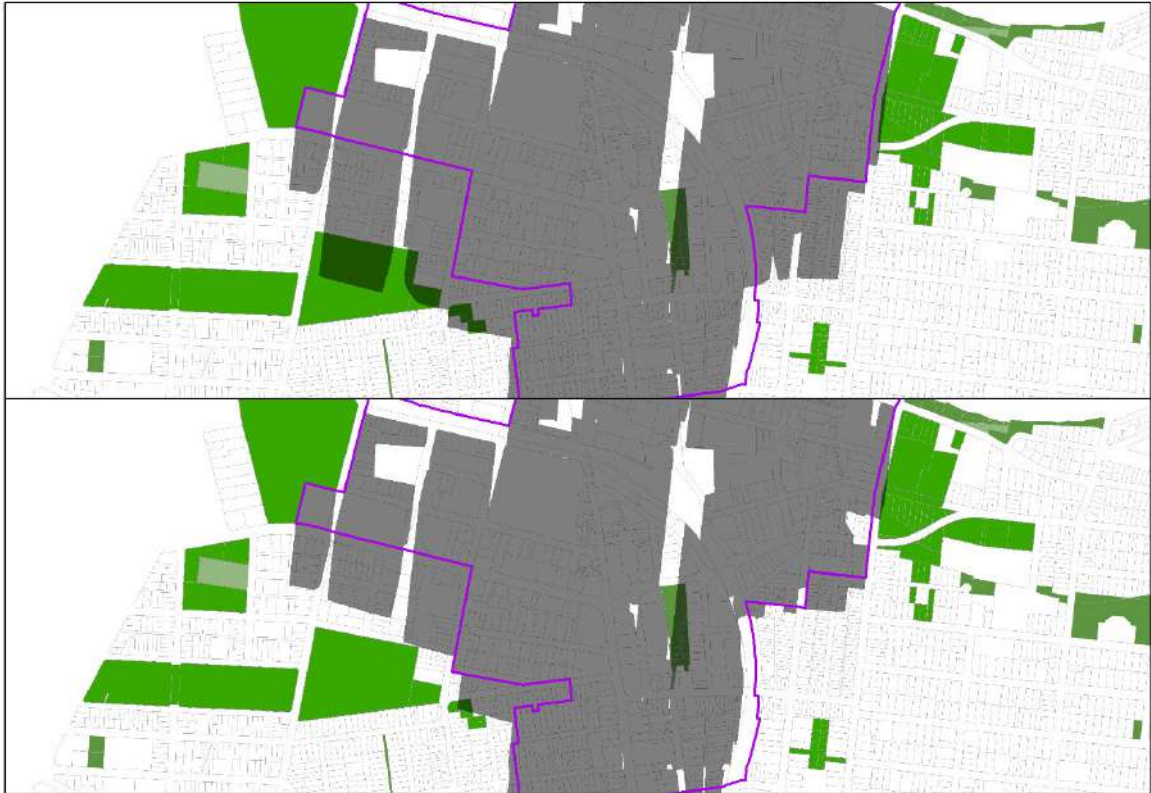


Figure 113 - Comparison of overshadowing between the Incentive Height of Buildings control for the CBD Planning Proposal (top) and the Incentive Height of Buildings controls for the CBD Planning Proposal after revisions have been made to improve sunlight access to heritage conservation areas and public open spaces (bottom) – 21 June – 11:30am

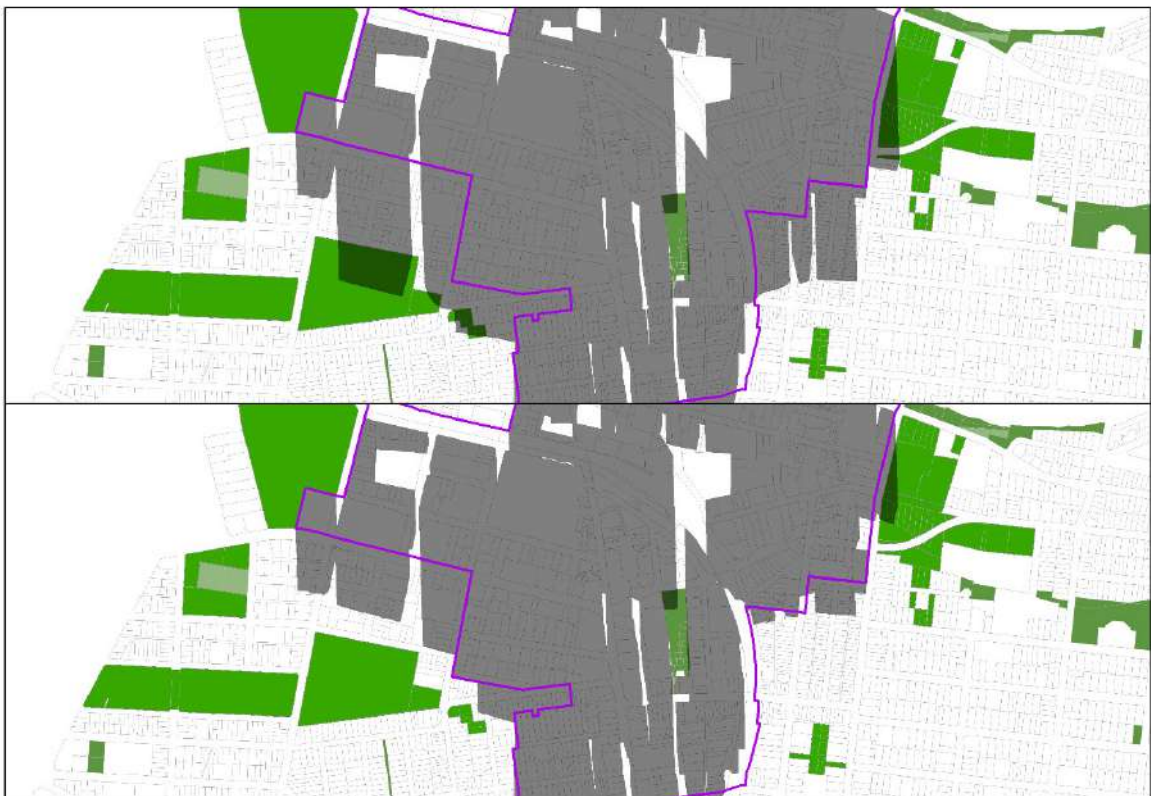


Figure 114 - Comparison of overshadowing between the Incentive Height of Buildings control for the CBD Planning Proposal (top) and the Incentive Height of Buildings controls for the CBD Planning Proposal after revisions have been made to improve sunlight access to heritage conservation areas and public open spaces (bottom) – 21 June – 12-noon

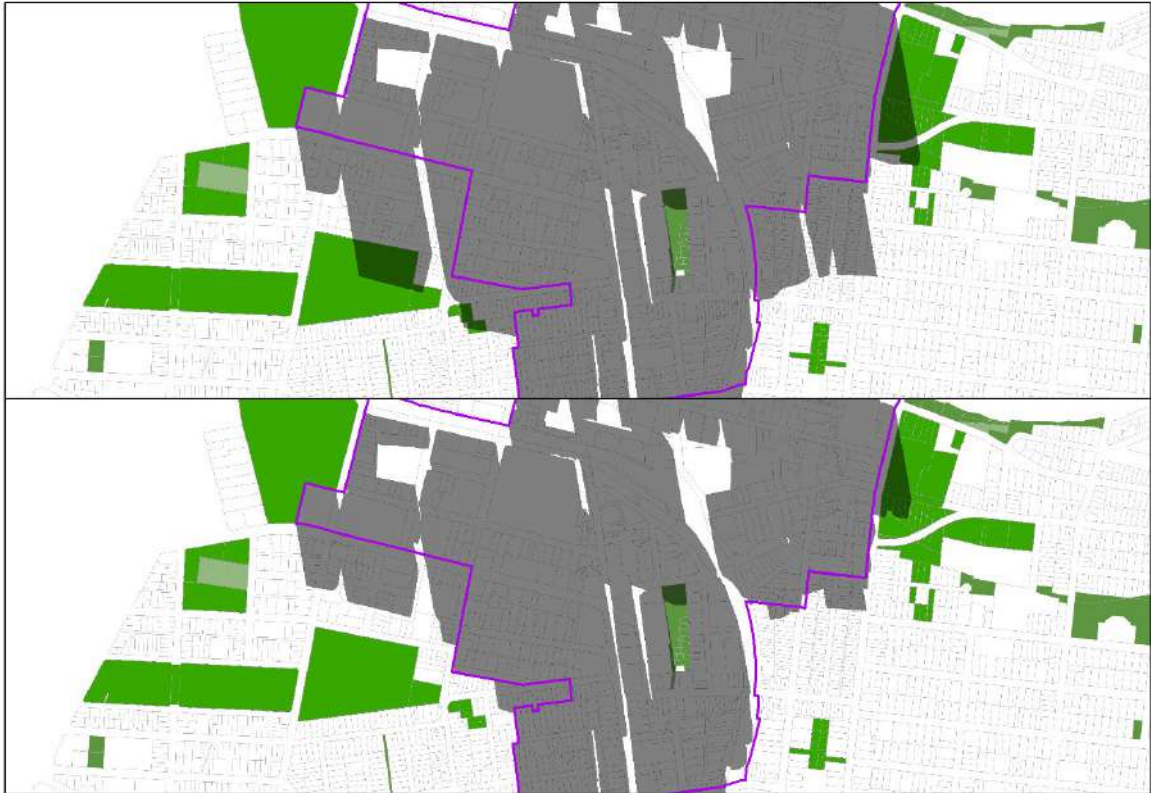


Figure 115 - Comparison of overshadowing between the Incentive Height of Buildings control for the CBD Planning Proposal (top) and the Incentive Height of Buildings controls for the CBD Planning Proposal after revisions have been made to improve sunlight access to heritage conservation areas and public open spaces (bottom) – 21 June – 12:30pm

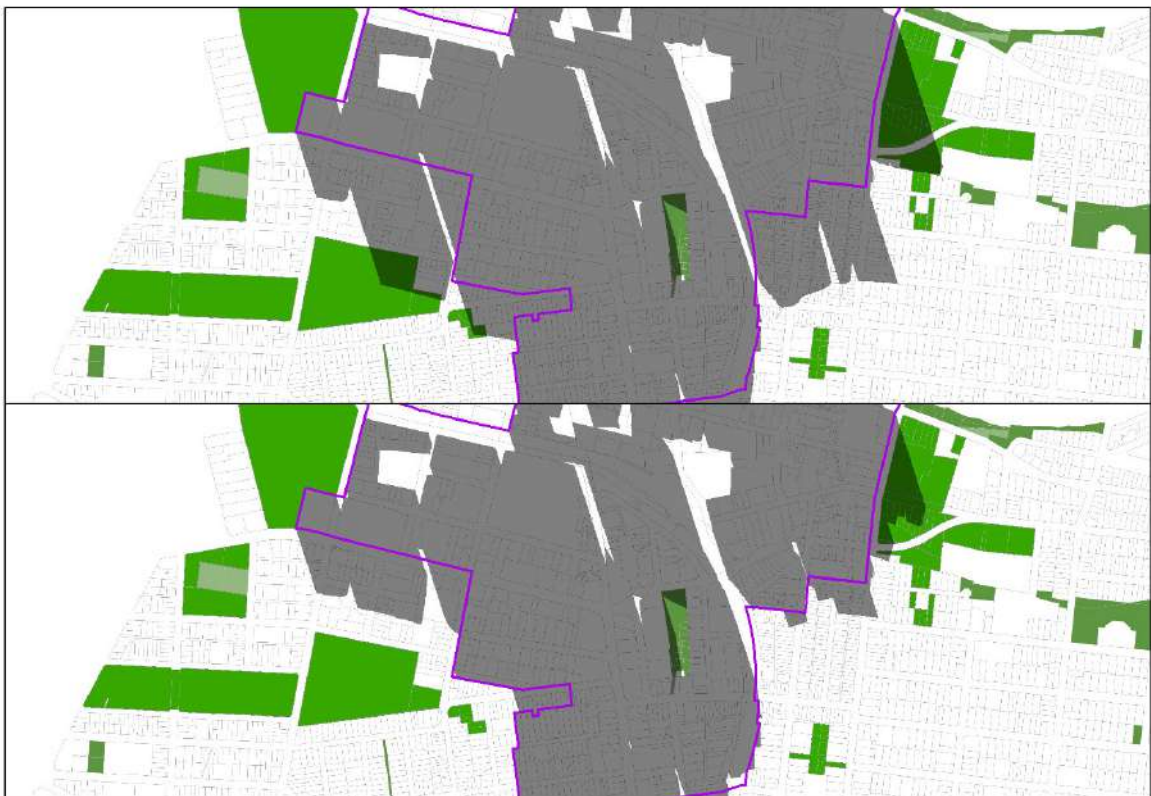


Figure 116 - Comparison of overshadowing between the Incentive Height of Buildings control for the CBD Planning Proposal (top) and the Incentive Height of Buildings controls for the CBD Planning Proposal after revisions have been made to improve sunlight access to heritage conservation areas and public open spaces (bottom) – 21 June – 1pm

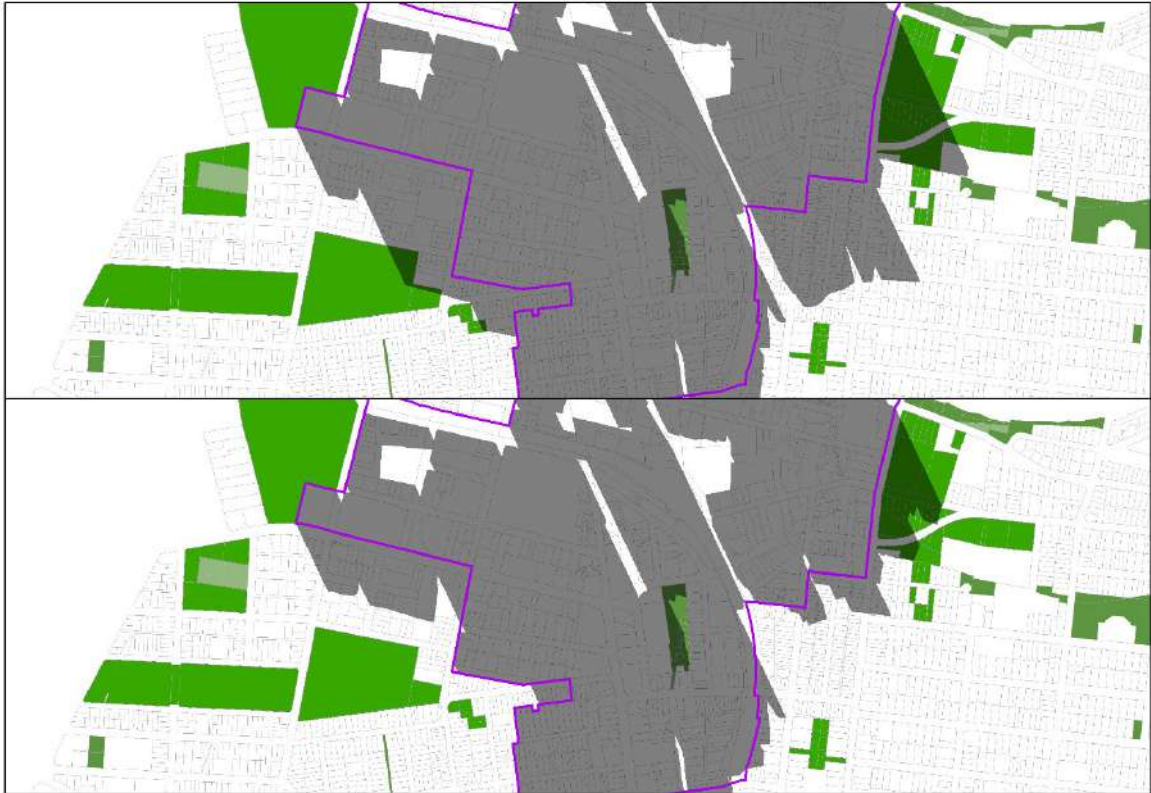


Figure 117 - Comparison of overshadowing between the Incentive Height of Buildings control for the CBD Planning Proposal (top) and the Incentive Height of Buildings controls for the CBD Planning Proposal after revisions have been made to improve sunlight access to heritage conservation areas and public open spaces (bottom) – 21 June – 1:30pm

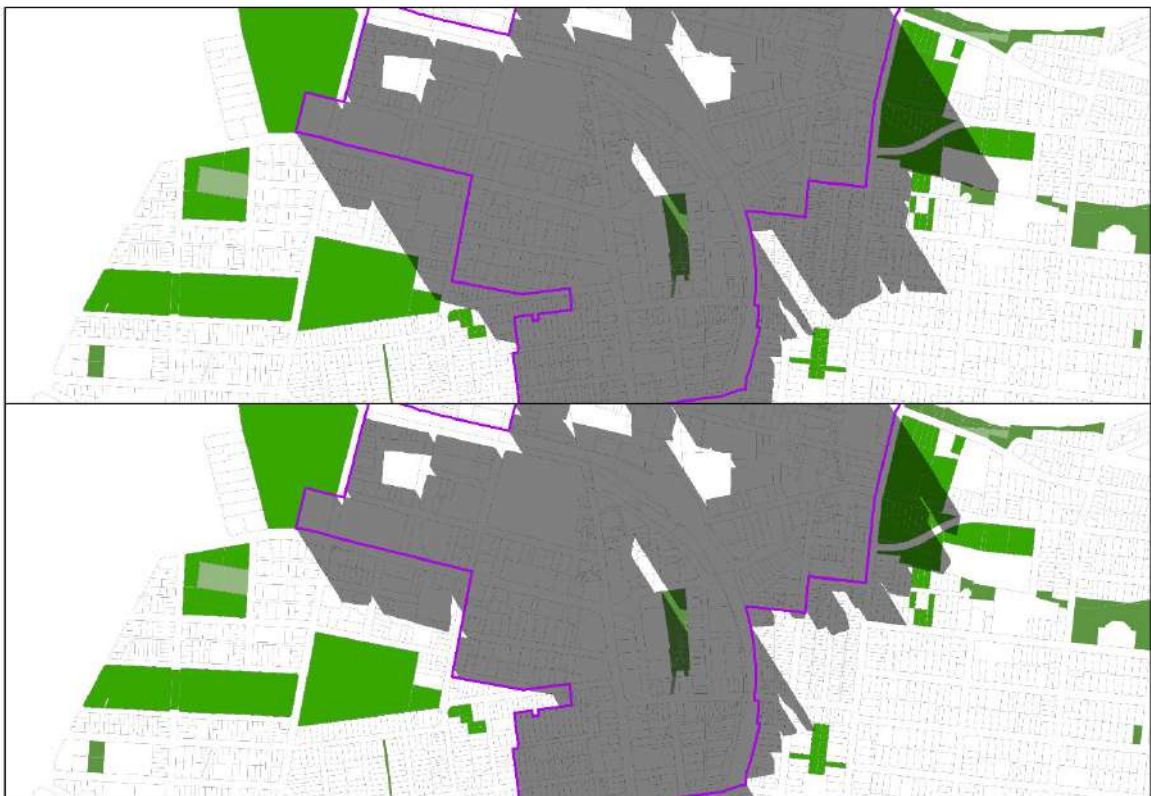


Figure 118 - Comparison of overshadowing between the Incentive Height of Buildings control for the CBD Planning Proposal (top) and the Incentive Height of Buildings controls for the CBD Planning Proposal after revisions have been made to improve sunlight access to heritage conservation areas and public open spaces (bottom) – 21 June – 2pm



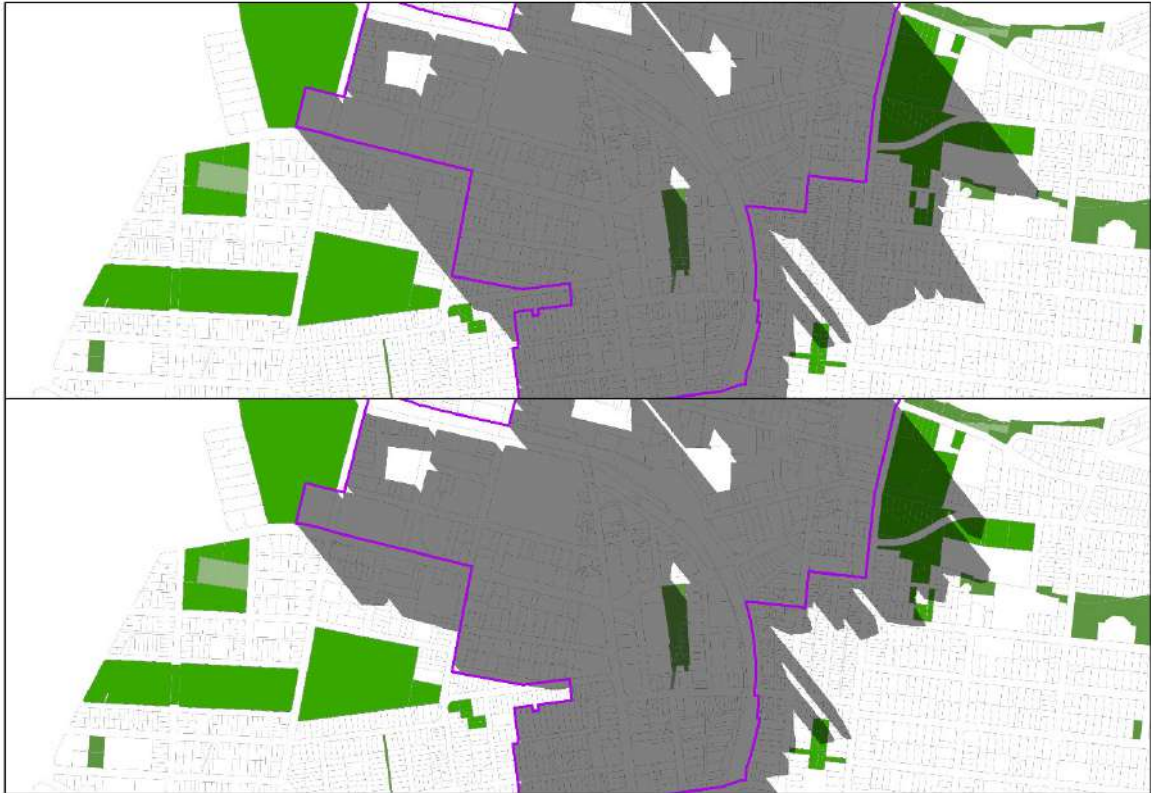


Figure 119 - Comparison of overshadowing between the Incentive Height of Buildings control for the CBD Planning Proposal (top) and the Incentive Height of Buildings controls for the CBD Planning Proposal after revisions have been made to improve sunlight access to heritage conservation areas and public open spaces (bottom) – 21 June – 2:30pm

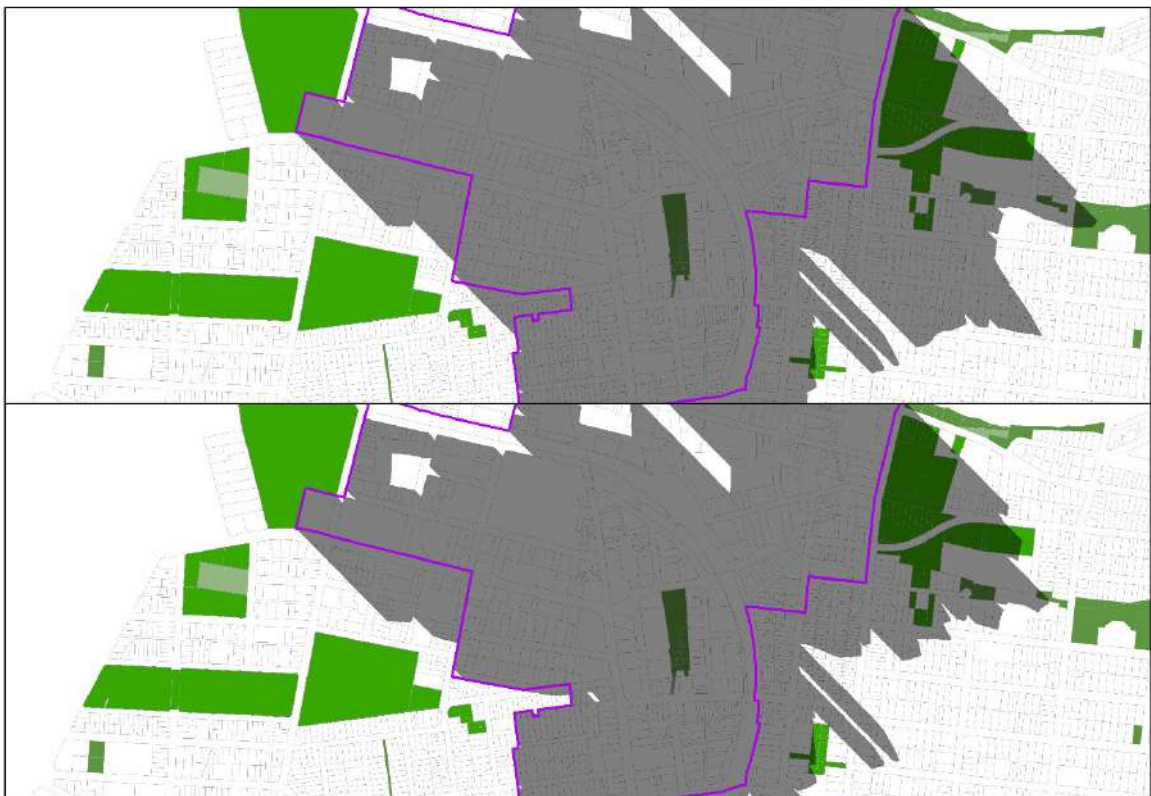


Figure 120 - Comparison of overshadowing between the Incentive Height of Buildings control for the CBD Planning Proposal (top) and the Incentive Height of Buildings controls for the CBD Planning Proposal after revisions have been made to improve sunlight access to heritage conservation areas and public open spaces (bottom) – 21 June – 3pm

# Appendix 7 – Parcel-based Assessment of Overshadowing of Heritage Conservation Areas after further detailed testing

This Appendix contains the comparative shadow analysis for the Heritage Conservation Areas for the four heritage conservation areas to the south of the Parramatta CBD. This analysis models the overshadowing for the revised Incentive Height of Buildings controls from the 24 June technical paper (iteration 3) (top row) revised Incentive Height of Buildings controls as a result of further detailed testing (iteration 7) (bottom row) at 30-minute intervals between 9am and 3pm on 21 June.

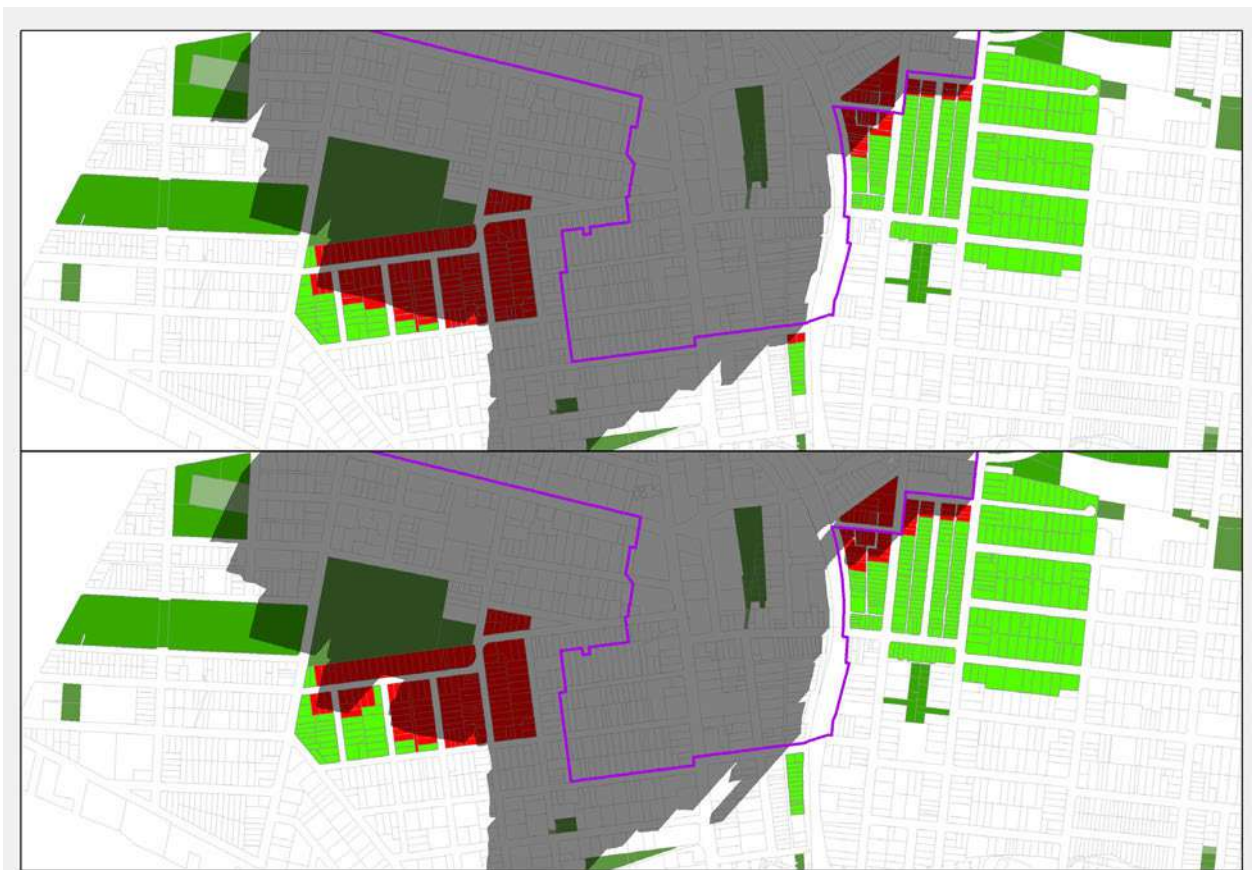


Figure 121 - Comparison of overshadowing between the revised Incentive Height of Buildings controls (iteration 3) (top) and the proposed revisions to the Incentive Height of Buildings as a result of further testing (iteration 7) (bottom) - 21 June - 9am

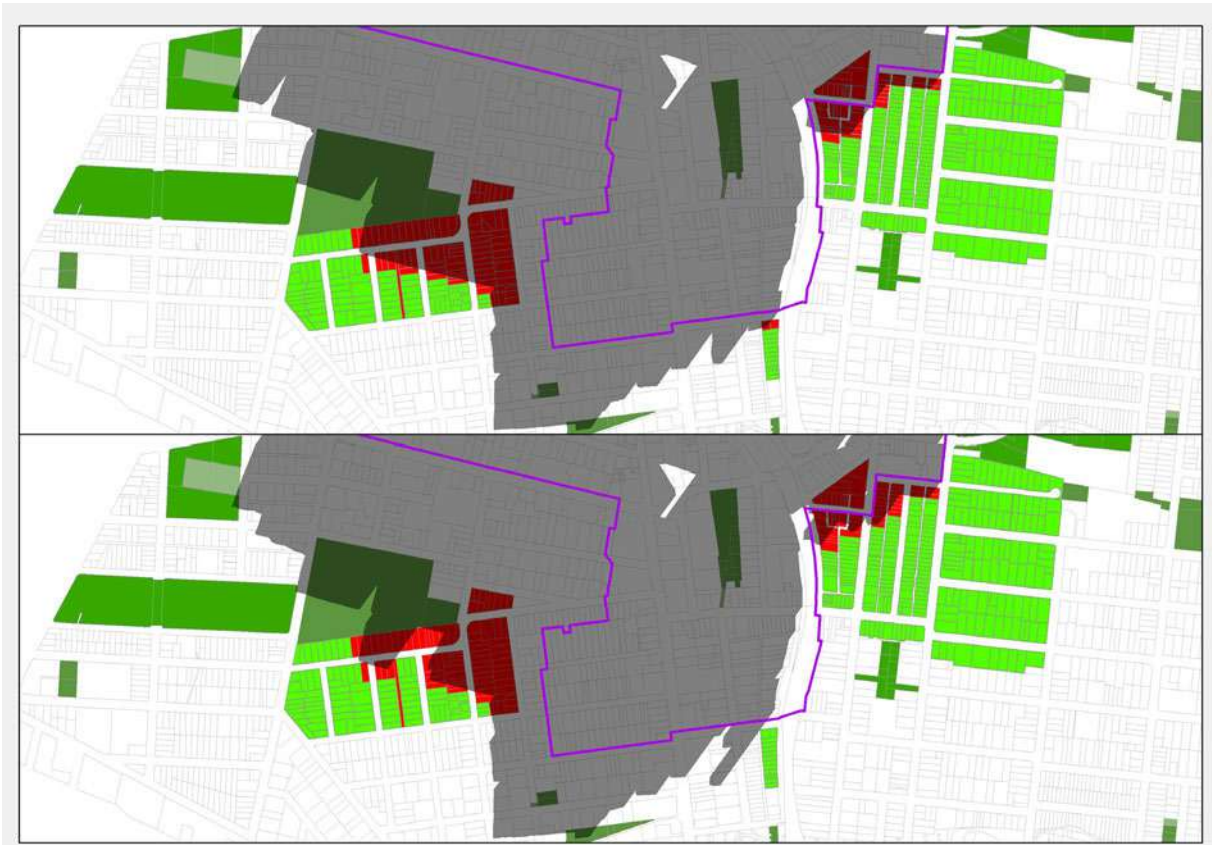


Figure 122 - Comparison of overshadowing between the revised Incentive Height of Buildings controls (iteration 3) (top) and the proposed revisions to the Incentive Height of Buildings as a result of further testing (iteration 7) (bottom) - 21 June - 9:30am

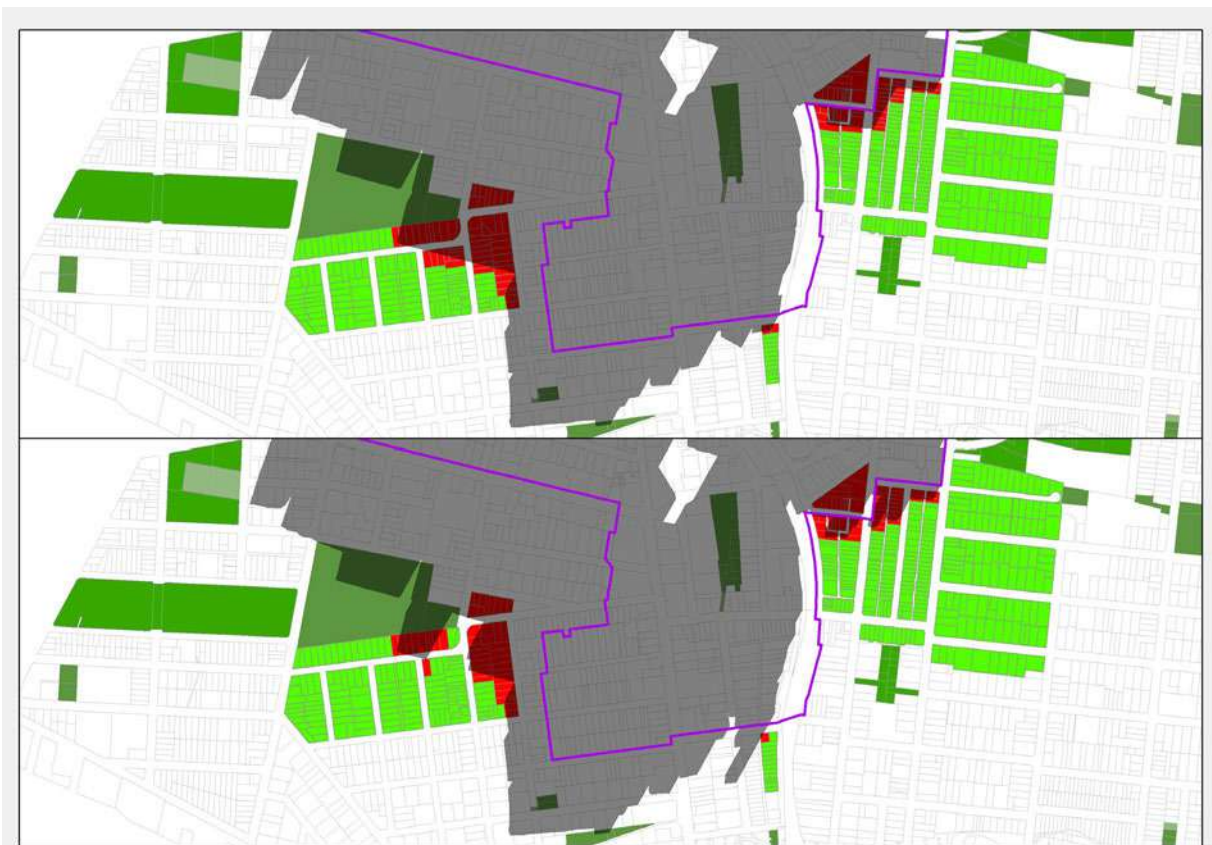


Figure 123 - Comparison of overshadowing between the revised Incentive Height of Buildings controls (iteration 3) (top) and the proposed revisions to the Incentive Height of Buildings as a result of further testing (iteration 7) (bottom) - 21 June - 10am

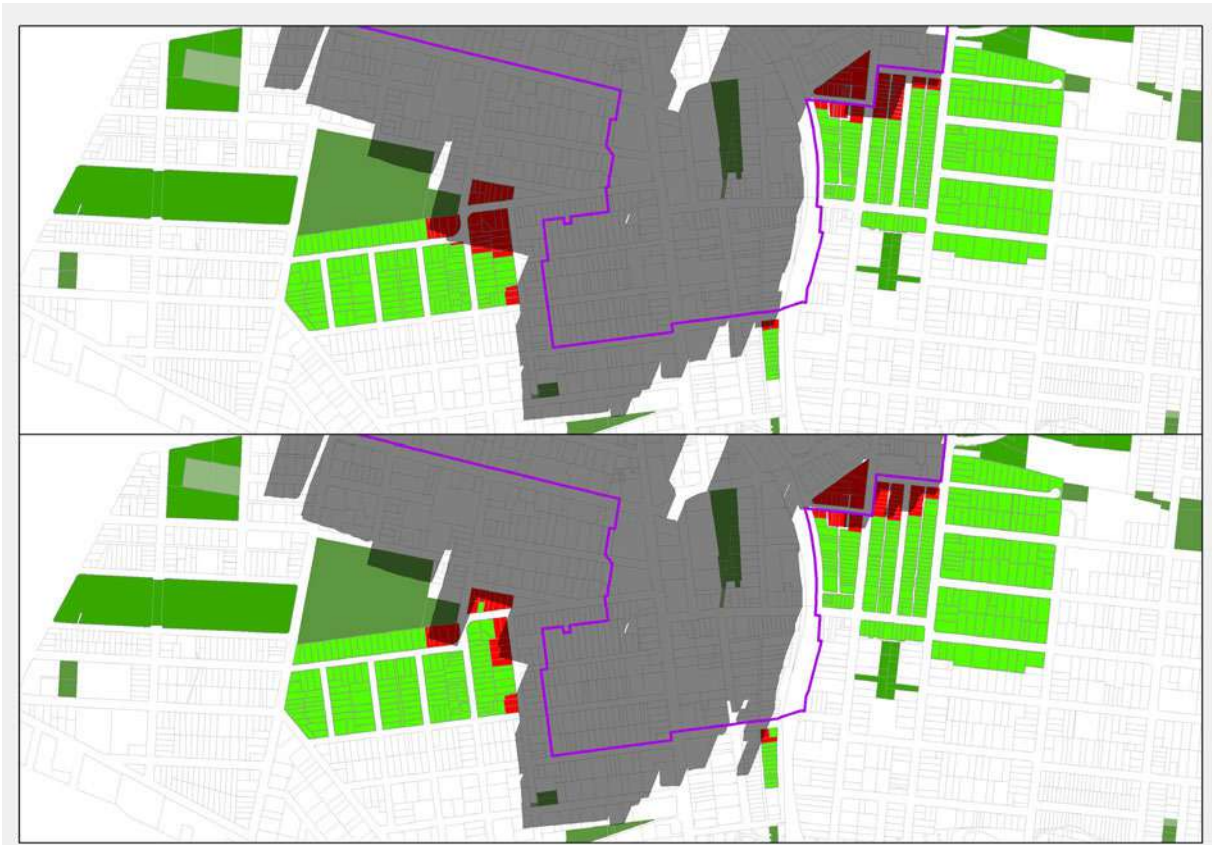


Figure 124 - Comparison of overshadowing between the revised Incentive Height of Buildings controls (iteration 3) (top) and the proposed revisions to the Incentive Height of Buildings as a result of further testing (iteration 7) (bottom) - 21 June - 10:30am

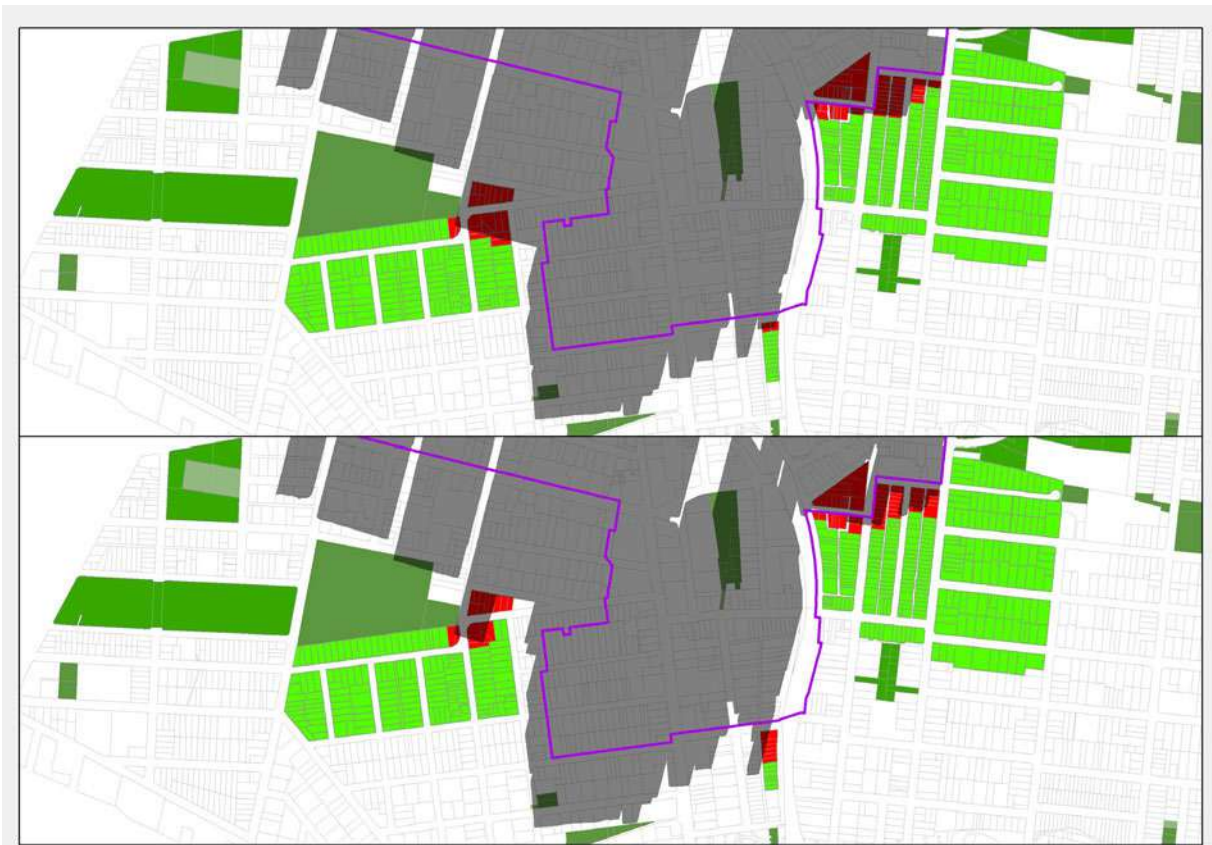


Figure 125 - Comparison of overshadowing between the revised Incentive Height of Buildings controls (iteration 3) (top) and the proposed revisions to the Incentive Height of Buildings as a result of further testing (iteration 7) (bottom) - 21 June - 11am

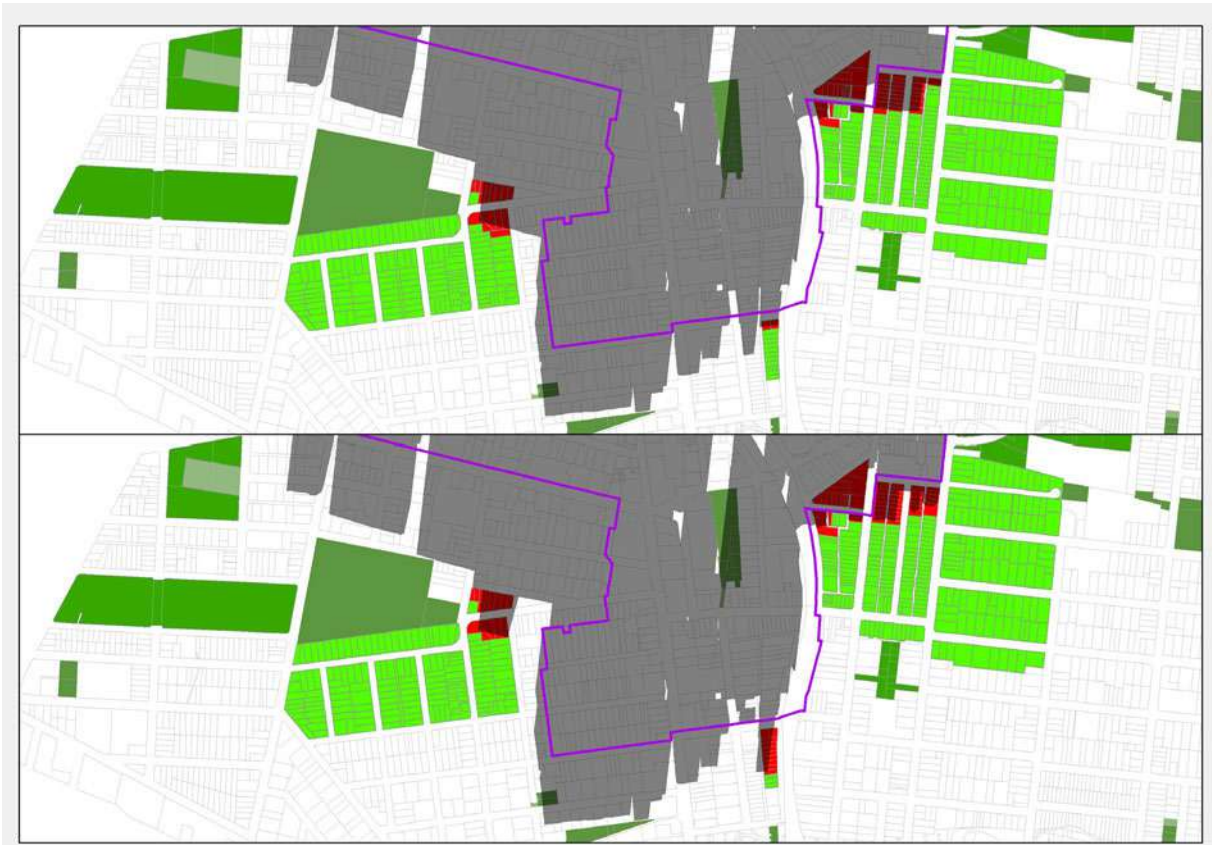


Figure 126 - Comparison of overshadowing between the revised Incentive Height of Buildings controls (iteration 3) (top) and the proposed revisions to the Incentive Height of Buildings as a result of further testing (iteration 7) (bottom) - 21 June - 11:30am

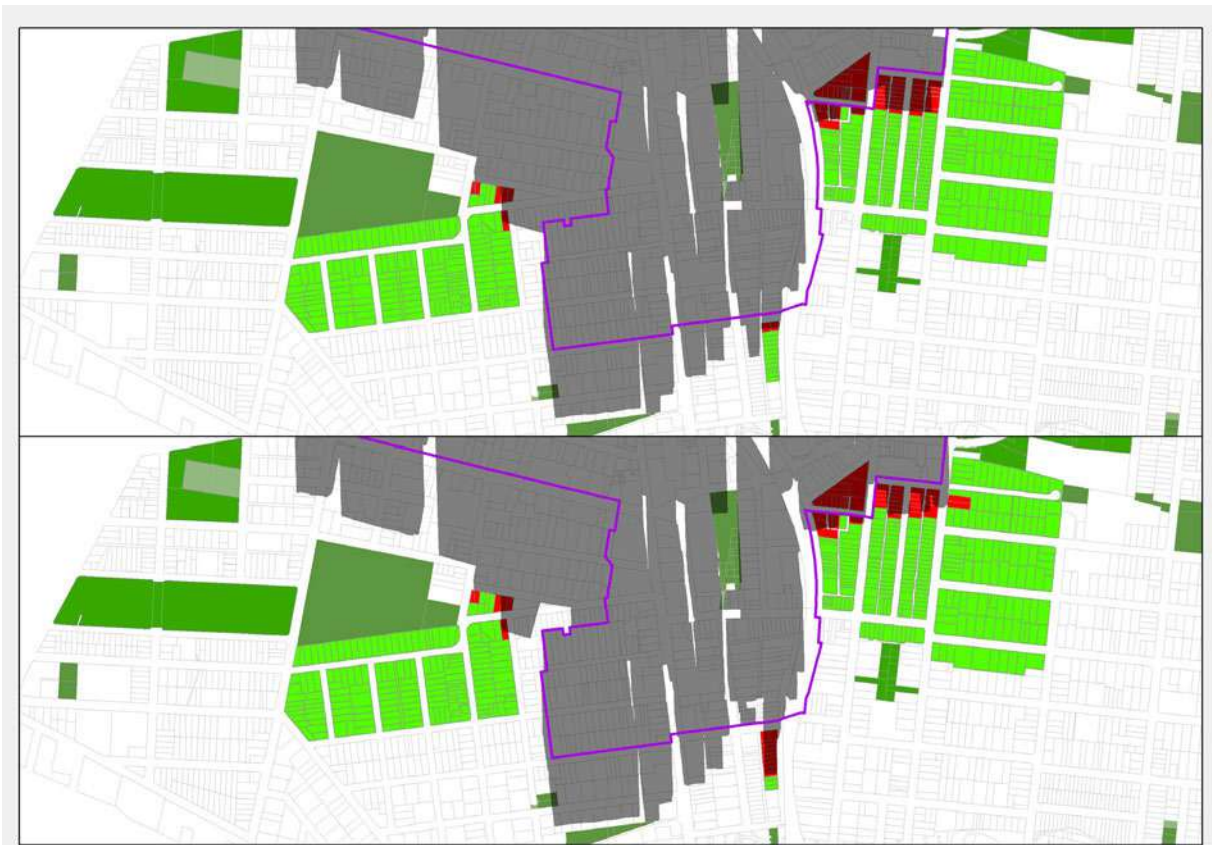


Figure 127 - Comparison of overshadowing between the revised Incentive Height of Buildings controls (iteration 3) (top) and the proposed revisions to the Incentive Height of Buildings as a result of further testing (iteration 7) (bottom) - 21 June - 12:noon

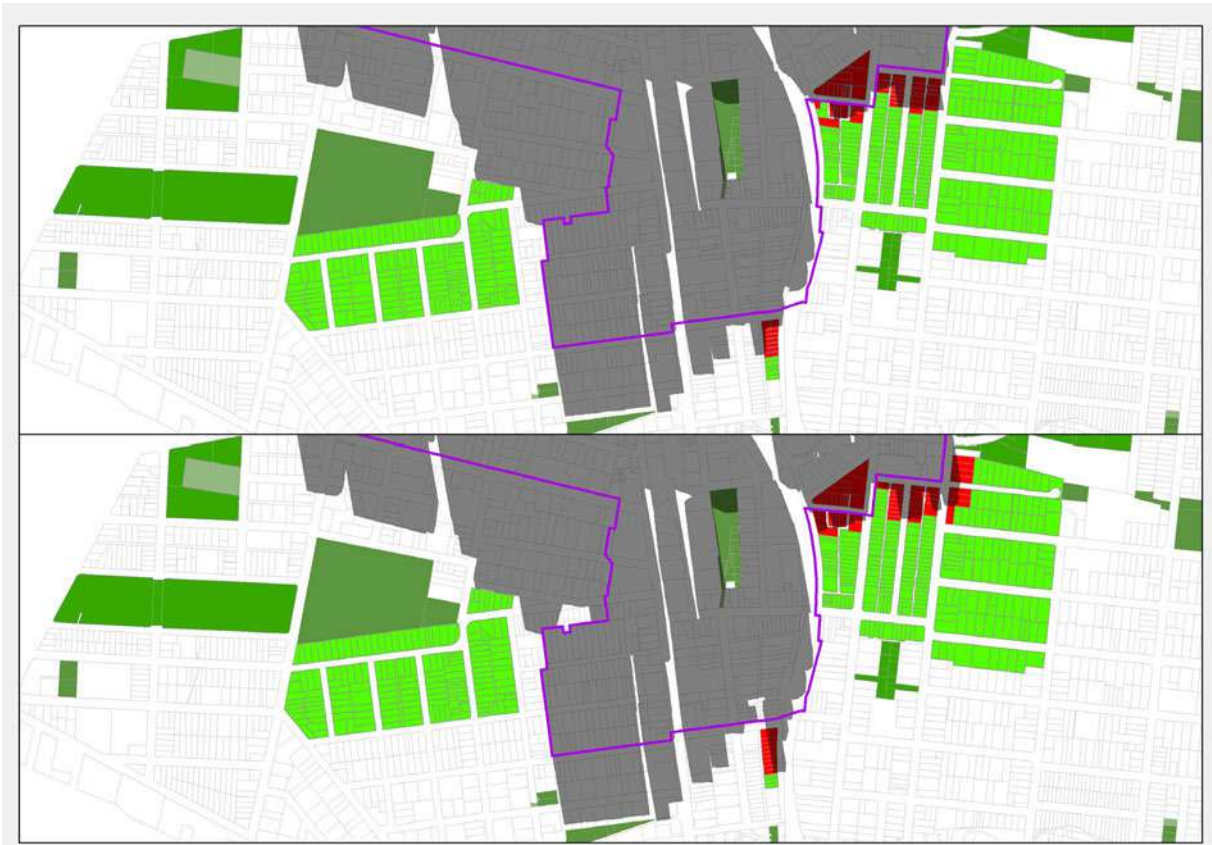


Figure 128 - Comparison of overshadowing between the revised Incentive Height of Buildings controls (iteration 3) (top) and the proposed revisions to the Incentive Height of Buildings as a result of further testing (iteration 7) (bottom) - 21 June - 12:30pm

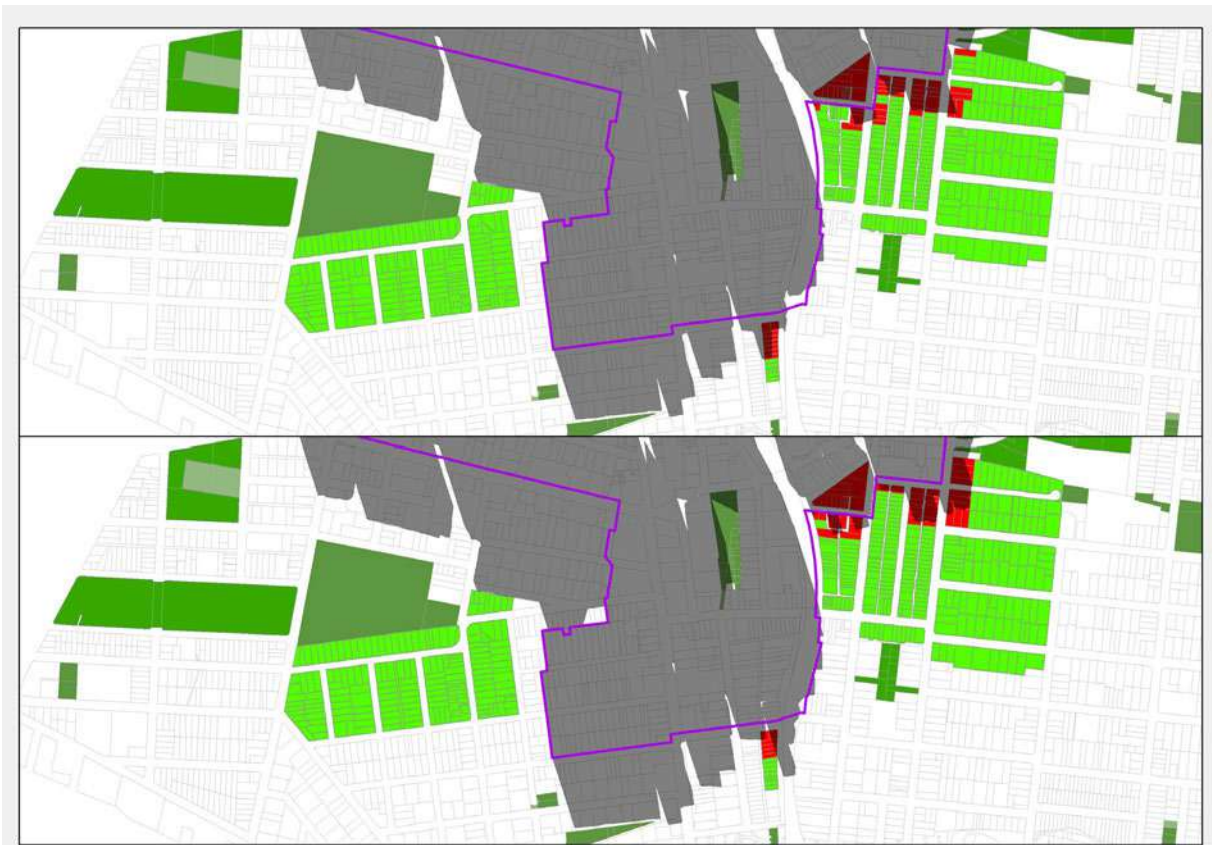


Figure 129 - Comparison of overshadowing between the revised Incentive Height of Buildings controls (iteration 3) (top) and the proposed revisions to the Incentive Height of Buildings as a result of further testing (iteration 7) (bottom) - 21 June - 1pm

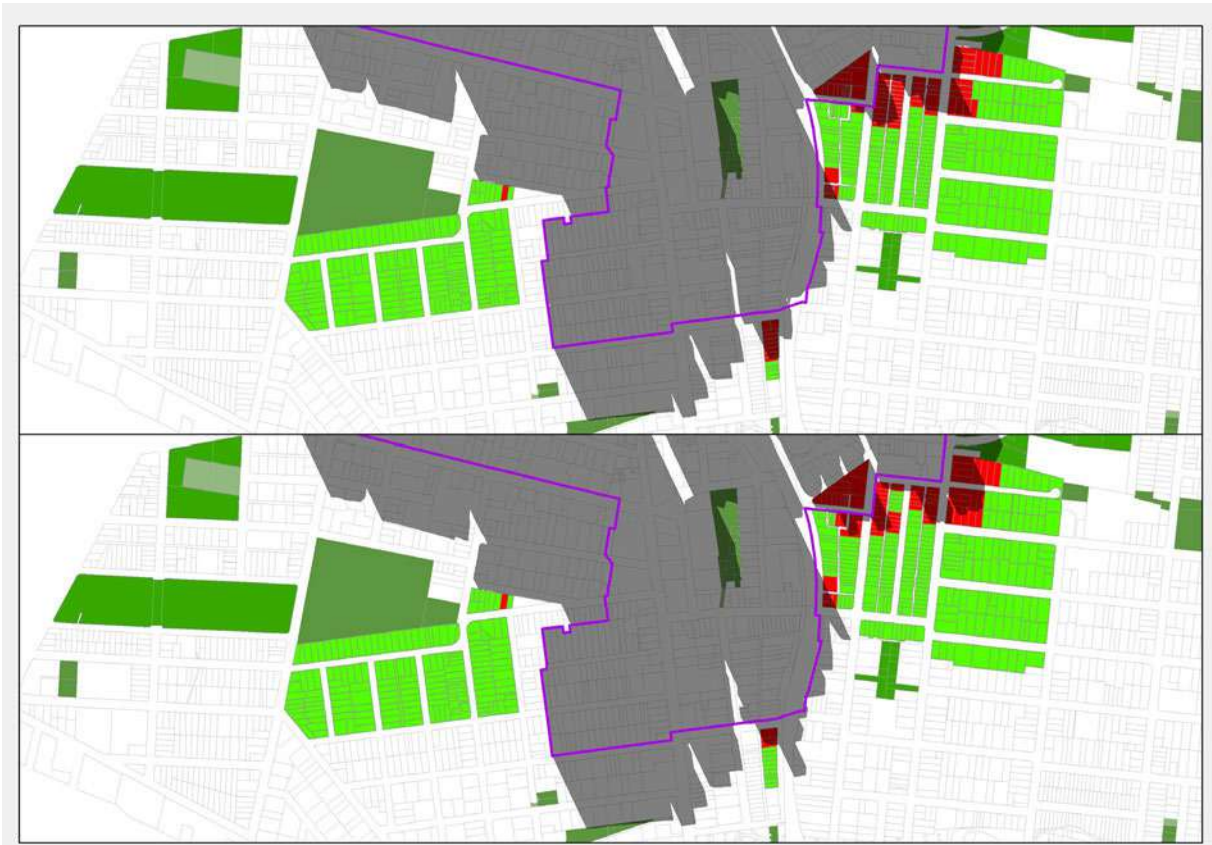


Figure 130 - Comparison of overshadowing between the revised Incentive Height of Buildings controls (iteration 3) (top) and the proposed revisions to the Incentive Height of Buildings as a result of further testing (iteration 7) (bottom) - 21 June - 1:30pm

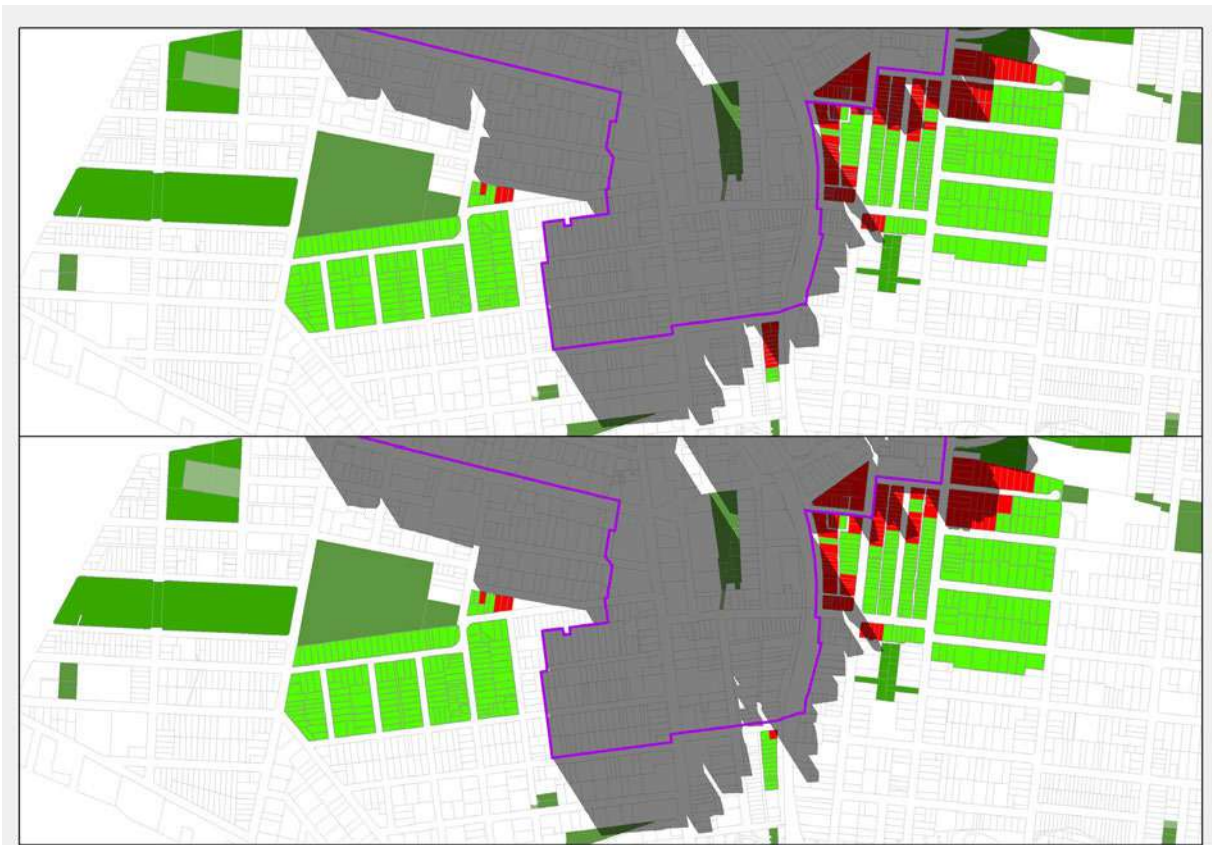


Figure 131 - Comparison of overshadowing between the revised Incentive Height of Buildings controls (iteration 3) (top) and the proposed revisions to the Incentive Height of Buildings as a result of further testing (iteration 7) (bottom) - 21 June - 2pm

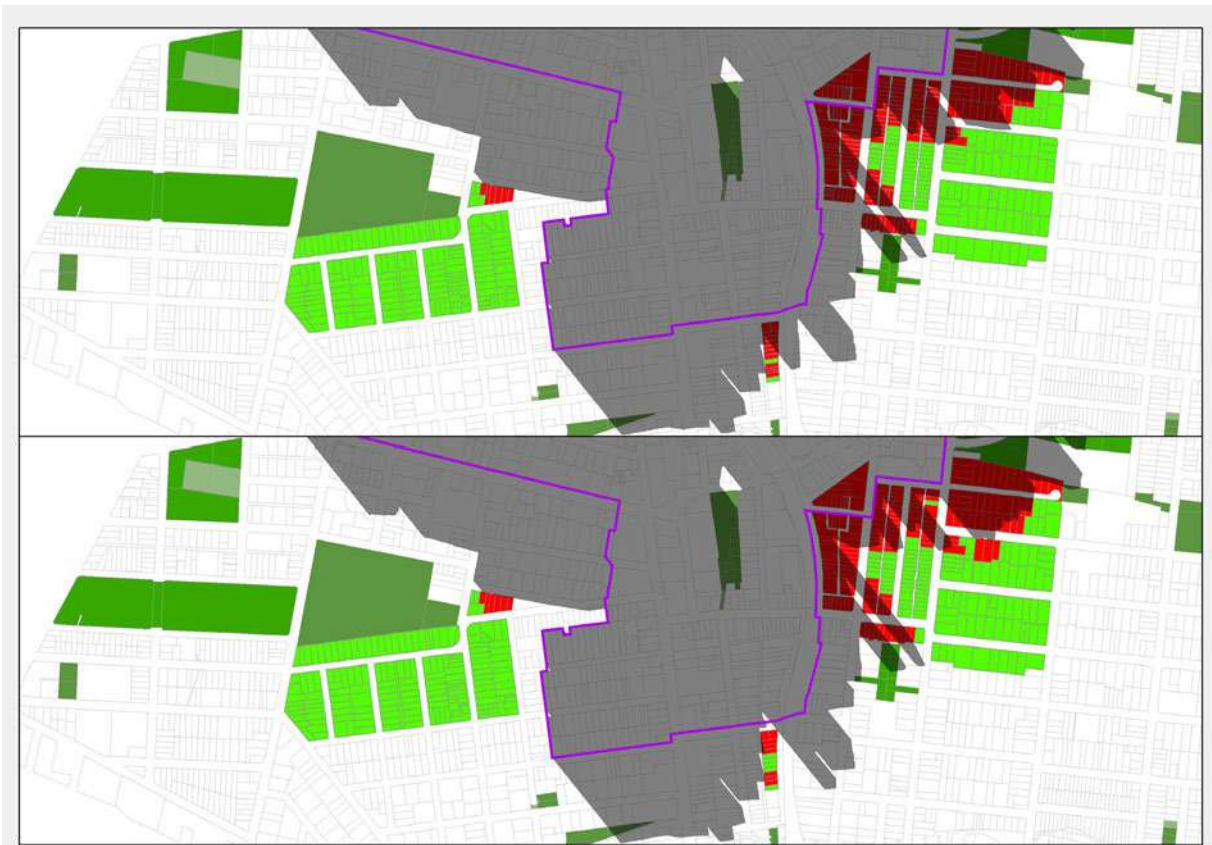


Figure 132 - Comparison of overshadowing between the revised Incentive Height of Buildings controls (iteration 3) (top) and the proposed revisions to the Incentive Height of Buildings as a result of further testing (iteration 7) (bottom) - 21 June - 2:30pm

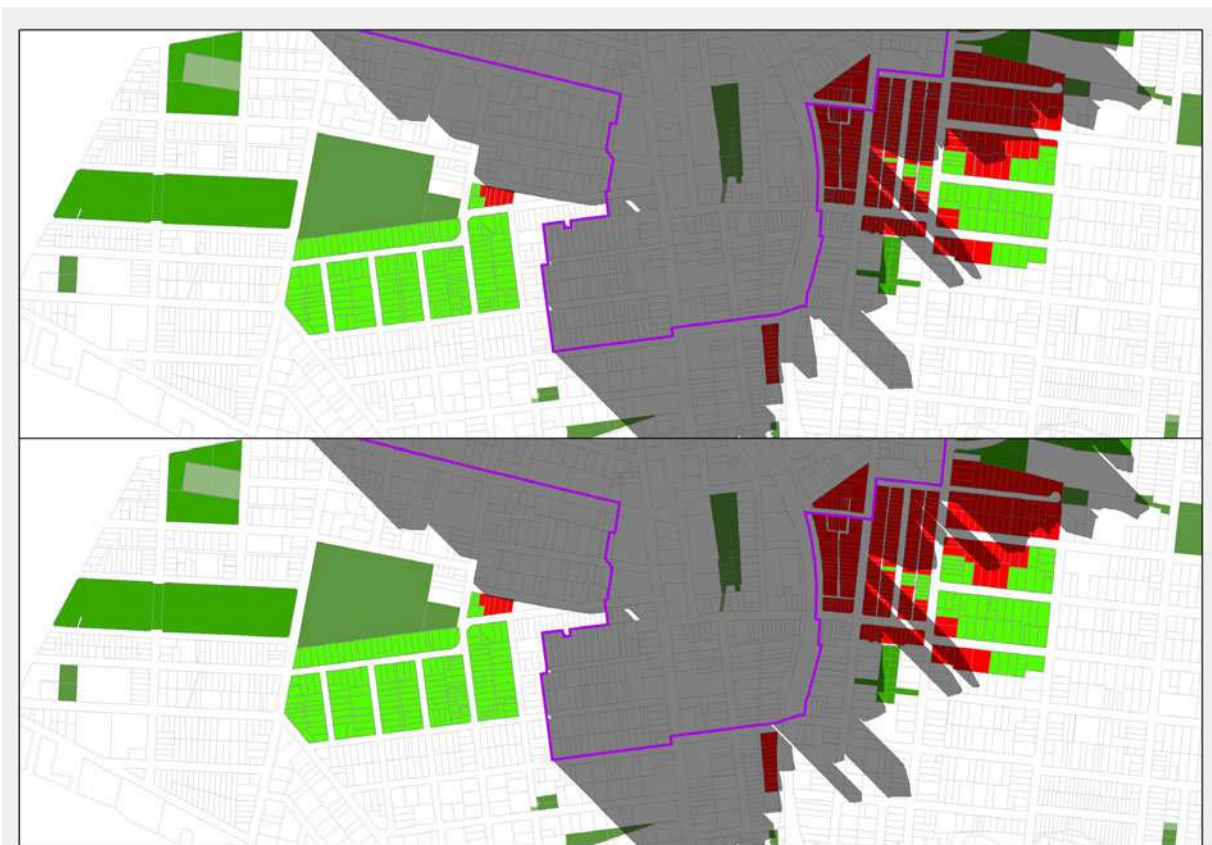


Figure 133 - Comparison of overshadowing between the revised Incentive Height of Buildings controls (iteration 3) (top) and the proposed revisions to the Incentive Height of Buildings as a result of further testing (iteration 7) (bottom) - 21 June - 3pm



# Appendix 8 – Overshadowing of Parramatta Square at the Spring equinox

This Appendix contains the comparative shadow analysis for the Parramatta Square Protected Area on 23 September (the Spring equinox) to test and address Condition 1(o) of the altered Gateway Determination to ensure sufficient compensatory area is provided in the wider Parramatta Square public domain to offset the overshadowing of the Parramatta Square Protected Area between 1pm and 2pm on 23 September.

In these figures, the solid blue area is the existing Protected Area for Parramatta Square and the hatched blue area is the full extent of the wider Parramatta Square public domain.

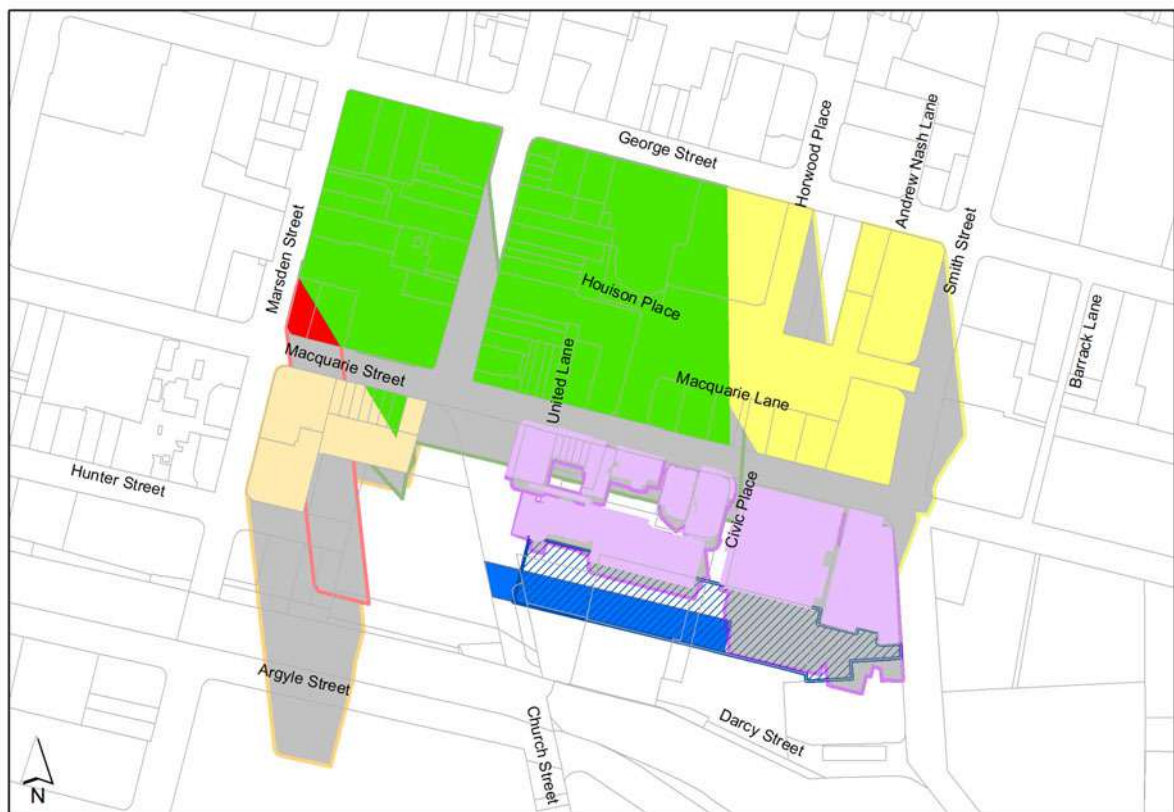


Figure 134 - Overshadowing for Parramatta Square at 12 noon on 23 September

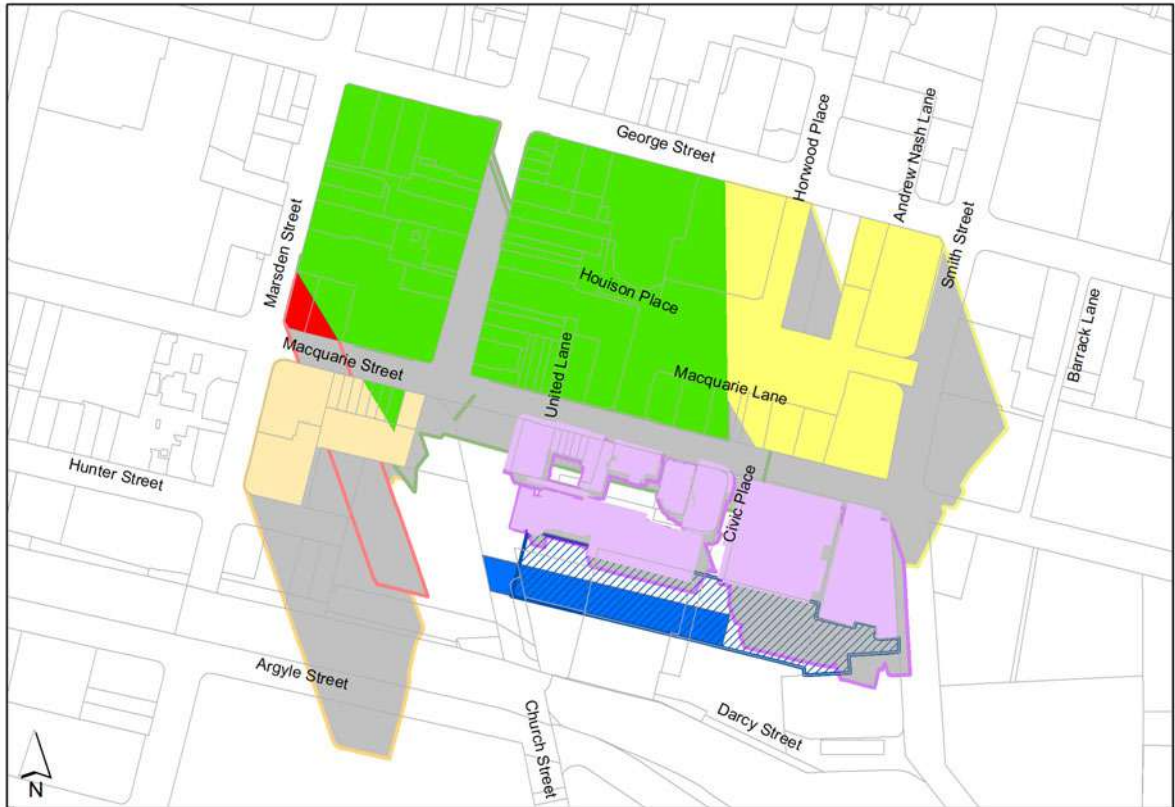


Figure 135 - Overshadowing for Parramatta Square at 12:30pm on 23 September

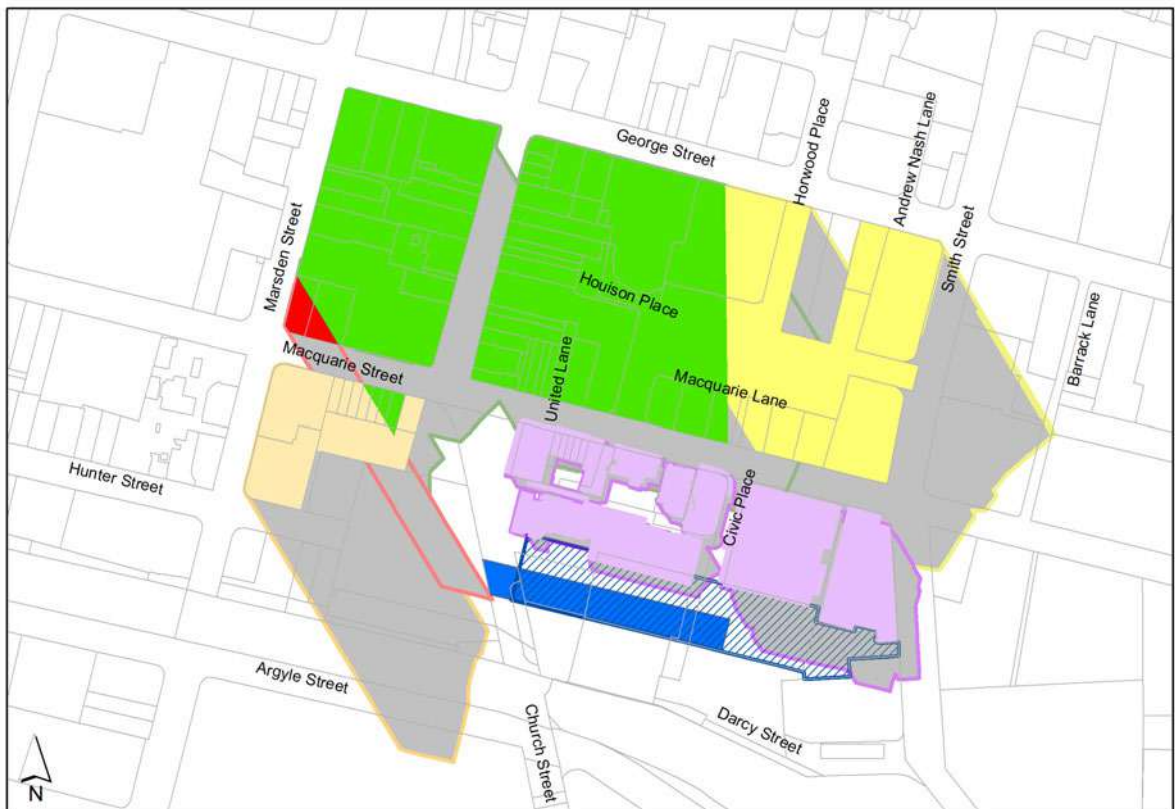


Figure 136 - Overshadowing for Parramatta Square at 1:00pm on 23 September

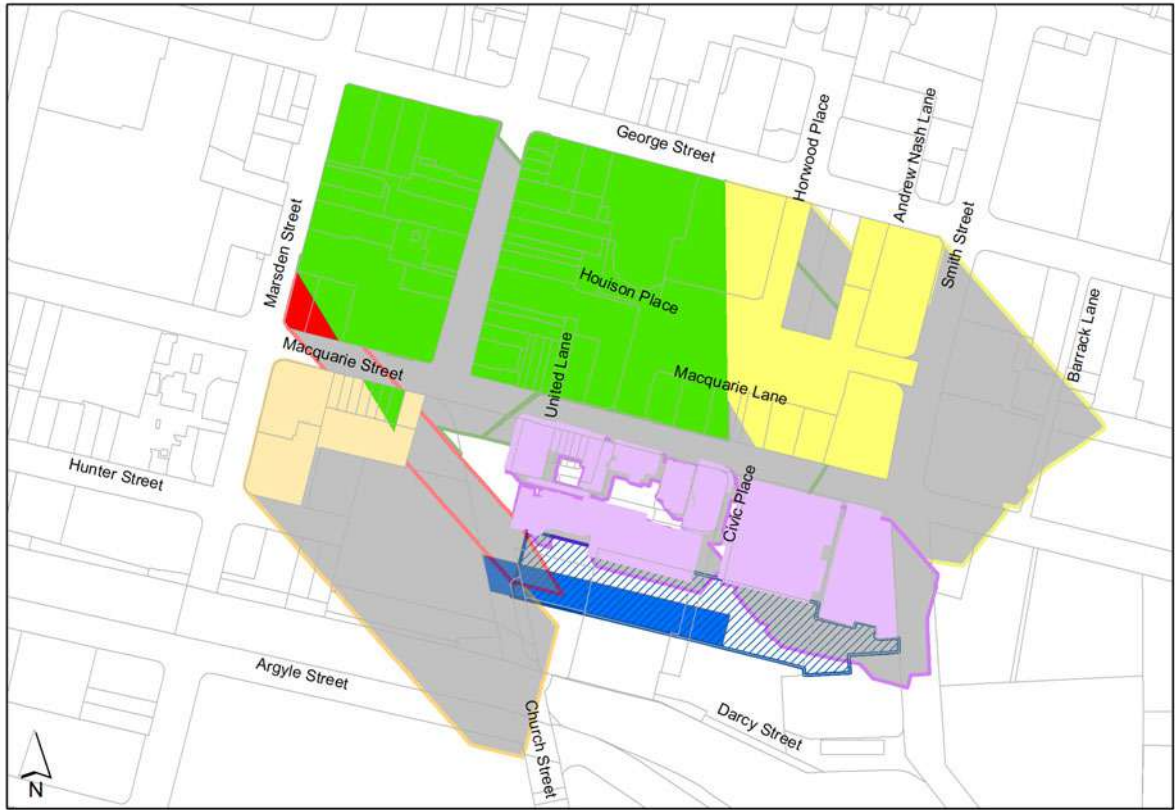


Figure 137 - Overshadowing for Parramatta Square at 1:30pm on 23 September

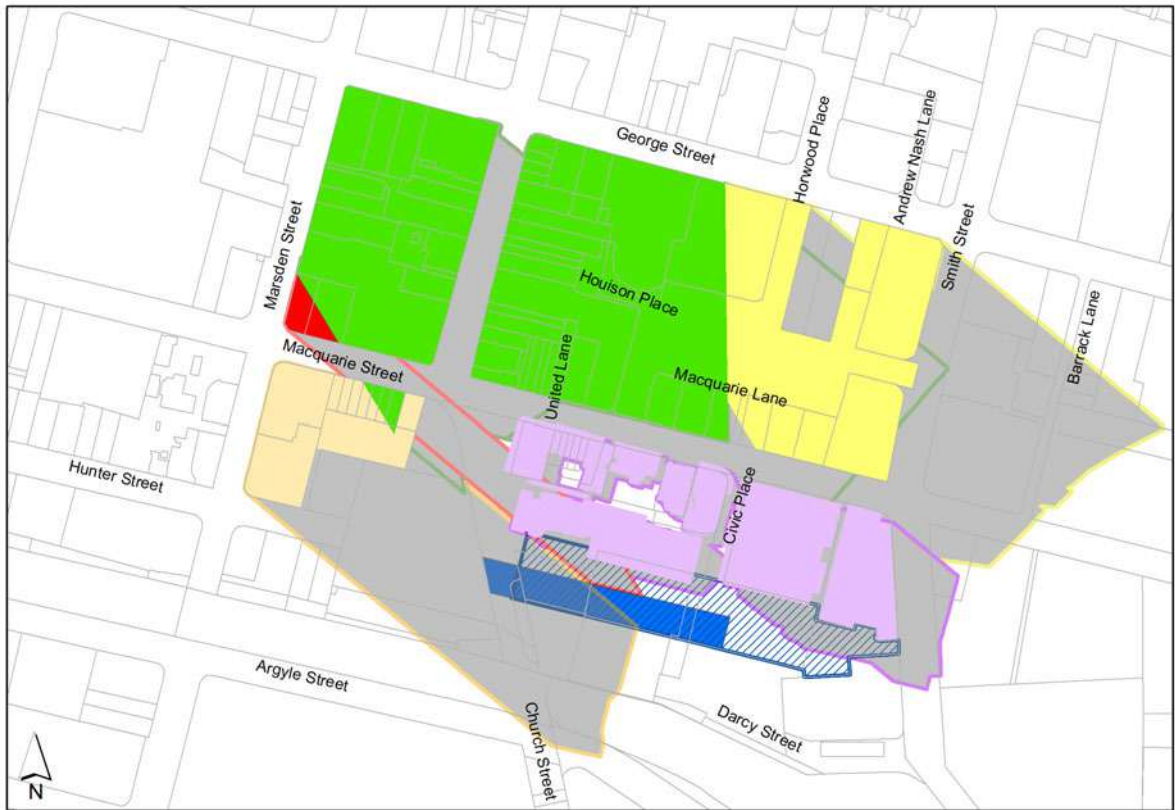


Figure 138 - Overshadowing for Parramatta Square at 2:00pm on 23 September