

INNOVATIVE

ITEM NUMBER	17.3
SUBJECT	FOR APPROVAL: Draft Planning Strategy for North-East Planning Investigation Area
REFERENCE	F2020/01908 - D07679908
REPORT OF	Team Leader –Land Use Planning

PURPOSE:

To seek Council endorsement of a Draft Planning Strategy for the North-East Planning Investigation Area for the purposes of public exhibition to seek community and stakeholder feedback on six (6) built form options.

RECOMMENDATION

- (a) **That** Council endorse the Draft Planning Strategy for the North-East Planning Investigation Area provided at **Attachment 1** for the purposes of public exhibition (noting that it contains six (6) built form options).
- (b) **That** the Draft Planning Strategy for the North-East Planning Investigation Area (PIA) be publicly exhibited for a minimum period of 28 days and that Council use the following engagement tools and methods at a minimum:
 - i. Notification letters to landowners and occupiers (including owners and occupiers of individual apartments within strata buildings) inside the North-East PIA boundary; and landowners and occupiers within a 200m buffer of the North-East PIA boundary;
 - ii. Consultation with Council’s Heritage Advisory Committee;
 - iii. Consultation with relevant public authorities, including the Department of Planning, Industry and Environment (DPIE), Transport for NSW and the NSW Heritage Office;
 - iv. Copy of the exhibition documents at Council’s Customer Service Centre and Parramatta Library;
 - v. Public notice on City of Parramatta corporate website, and ‘Participate Parramatta’ City of Parramatta Council website; and
 - vi. Free text response to enable an online submission.
- (c) **That** Council delegate authority to the CEO to correct any minor anomalies or errors of a non-policy and administrative nature relating to the Draft Planning Strategy prior to exhibition.
- (d) **Further, that** a subsequent report be prepared to Council detailing the outcomes of the public exhibition period, the findings of the economic feasibility study and an assessment of the built form options against the weighted assessment criteria described in Section 7 of the Draft Planning Strategy, together with an updated Draft Planning Strategy (including a single recommended option).

BACKGROUND

1. On 25 November 2019, Council considered a report on the Parramatta CBD Planning Proposal (Planning Proposal) and resolved to defer a number of areas, including an area now known as the “North-East Planning Investigation

Area”, from the broader Planning Proposal boundary for future planning consideration as part of the Planning Investigation Area (‘PIA’) work identified in the *Parramatta CBD Planning Strategy* (2015) as shown in **Figure 1**.

2. The properties within the North-East PIA are located between the land parcels fronting Church Street to the west and the Sorrell Street Heritage Conservation Area (HCA) to the east in Parramatta/North Parramatta, and extends from Isabella Street in the north to Ross Street in the south as shown in **Figure 2**.



- CBD Planning Proposal – area where changes to the controls are proposed
- CBD Planning Proposal – land parcels not subject to any change
- Planning Investigation Areas – to be considered in the future
- North-East Planning Investigation Area boundary – subject of this Planning Strategy

Figure 1: The North-East Planning Investigation Area in relation to the wider Parramatta CBD area and surrounding context.

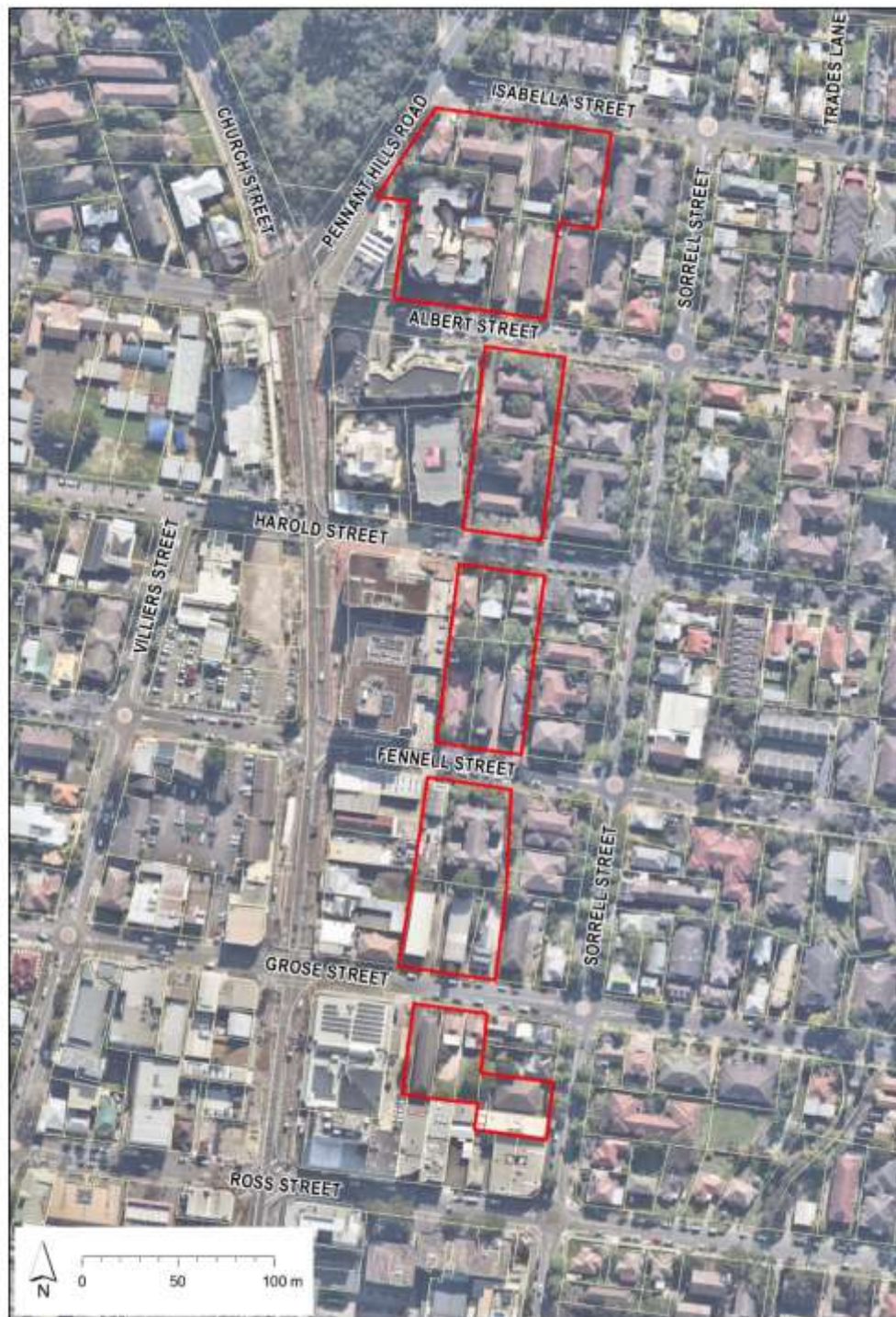


Figure 2 – North-East Planning Investigation Area – Study Area

3. There are 25 sites within the study area of the North-East PIA, including:
 - a. 7 dwelling houses;
 - b. 2 residential flat buildings in single ownership;
 - c. 1 commercial strata building; and
 - d. 15 strata plan residential flat buildings.
4. The dominant existing building type in the study area are residential flat buildings. Of the 17 existing residential flat buildings in the study area:
 - a. 5 are from 1960s;

- b. 6 are from 1970s;
 - c. 3 are from 1980s;
 - d. 1 is from 1990s; and
 - e. 2 are from 2000s.
5. On 9 June 2020, Council considered a report on a site-specific Planning Proposal at 23-27 Harold Street, North Parramatta (within the study area) and resolved as follows:
 - a) *That as a result of Council's resolution of 25 November 2019 to excise areas currently zoned R4 High Density Residential from the Parramatta CBD Planning Proposal, Council defer progressing the Planning Proposal that is the subject of this report until Council has adopted a planning strategy for the planning investigation area containing the subject site.*
 - b) *That Council note that work on the planning investigation area between Church Street and the Sorrell Street Heritage Conservation Area will be the subject of a Councillor workshop before a draft planning strategy is reported to Council for its consideration in October 2020, for the purposes of public exhibition.*
6. On 7 October 2020, preliminary findings and analysis undertaken to inform a Draft Planning Strategy for the North-East Planning Investigation Area were presented at a Councillor Workshop. Six (6) built form options were illustrated with floor space ratios (FSRs) ranging between 0.8:1 and 6:1 as shown in **Figures 4 to 9** below.

DRAFT PLANNING STRATEGY

7. The Draft Planning Strategy for the North-East PIA at **Attachment 1** provides an analysis of the area and its context, and also illustrates six (6) built form options for community feedback. The final preferred option will be determined in the post-exhibition period using weighted assessment criteria, once Council has considered all community feedback and undertaken further analysis.
8. The weighted assessment criteria are detailed in Section 7 of the Draft Planning Strategy for the North-East PIA and are categorised as follows:
 - a. Context and Neighbourhood Character (20%);
 - b. Built Form and Scale (20%);
 - c. Heritage Relationships (20%);
 - d. Strategic Planning (20%);
 - e. Land Use and Transport Integration (15%); and
 - f. Economic Feasibility (5%).

The further technical analysis will include a separate economic feasibility study for the precinct, which will consider the nature of existing development and the proposed built form options. This is discussed in greater detail later in this report under the heading 'Economic Considerations'. The final Planning Strategy will guide site-specific planning proposals in the PIA.

9. The key objective of the Draft Planning Strategy is to establish a suitable transition between the proposed high rise zone on Church Street (under the *Parramatta CBD Planning Proposal*) and low rise development in the Sorrell

Street HCA (under existing planning controls). The Strategy needs to respond to opportunities presented in the precinct, including a new light rail stop, so as to encourage urban renewal and better land use-transport integration, but it also needs to respect the adjoining low-scale HCA. Preparation of the Draft Planning Strategy is particularly relevant to the following Policy Directions from Council's *Local Strategic Planning Statement*:

- **P8** - Identify and consider opportunities for zoning and land use change in response to committed public transport connections.
- **P31** – Support the design and planning of Growth Precincts and Housing Diversity Precincts that commemorates the history of the site or locality to provide a link between past and future generations.

Built form options

10. The six built form options in the Draft Planning Strategy at **Attachment 1** consider planning, urban design, heritage and overshadowing analysis undertaken to inform the Parramatta CBD Planning Proposal (given the PIA was previously part of that proposal), previous Council resolved positions for the study area and also site-specific Planning Proposals. Importantly, new site analysis and urban design modelling has also been undertaken to inform the Draft Planning Strategy and these options.
11. The FSRs for the six built form options represent a range between the existing FSR control of 0.8:1 under *Parramatta LEP 2011* and the highest FSR of 6:1 recommended in a heritage study (see discussion below).
12. This report recommends seeking community feedback on the six built form options illustrated in **Figures 4 to 9** in this report. The rationale for this is given the North-East PIA is located in between a proposed high rise zone on Church Street and a low scale HCA, careful consideration is needed of the transition in built form in this area, so a range of FSRs helps to illustrate this for community feedback.

Heritage and Overshadowing Studies that informed the Parramatta CBD Planning Proposal

13. The first heritage study prepared by Urbis in 2015 recommended an FSR of 3:1 for the area now known as the North-East PIA, with 6:1 FSRs (generally) along Church Street and 0.8:1 FSR for the Sorrell Street HCA.
14. On the 14 December 2015, Council considered a report on the Parramatta CBD Planning Proposal including the Urbis heritage study and resolved for the North-East PIA to have an FSR of 6:1, with 6:1 FSRs (generally) along Church Street and 0.6:1 FSR for the Sorrell Street HCA.
15. The second heritage study prepared by Hector Abraham Architects (HAA) in 2017 was undertaken in response to matters raised by DPIE for site-specific planning proposals within the interface areas. Interface areas within the Parramatta CBD Planning Proposal boundary were generally located on the CBD fringe areas surrounding the core, and included the North-East PIA. The HAA study recommended an FSR of 6:1 for the study area, with 6:1 FSRs (generally) along Church Street and 0.6:1 FSR for the Sorrell Street HCA. This recommendation was supported by Council on 10 July 2017.
16. The Gateway Determination issued by DPIE for the Parramatta CBD Planning Proposal in December 2018 included a condition requiring cumulative overshadowing analysis of solar access to the southern Heritage Conservation

Areas (HCAs). These included the Harris Park [West] HCA, the Experiment Farm HCA, the Tottenham Street HCA with the condition requiring these areas to receive a minimum of two hours' direct sunlight between 9am and 3pm at midwinter (21 June). Pursuant to feedback from a previous Council workshop, testing was also undertaken on the North Parramatta and Sorrell Street HCAs.

17. The overshadowing analysis undertaken by Council indicated that land parcels in the North Parramatta and Sorrell Street HCAs could meet the minimum sunlight access threshold in the Gateway determination condition. This was 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. Therefore, heights and FSRs for this area were not required to be lowered to meet this condition at that time.

Site-Specific Planning Proposals (SSPPs)

18. There are two SSPPs that are relevant to the consideration of the built form outcomes for the North-East PIA, being the SSPP at 470 Church Street (adjacent to the PIA) and the SSPP at 23-27 Harold Street (within the PIA). These sites are as shown in **Figure 3** below.

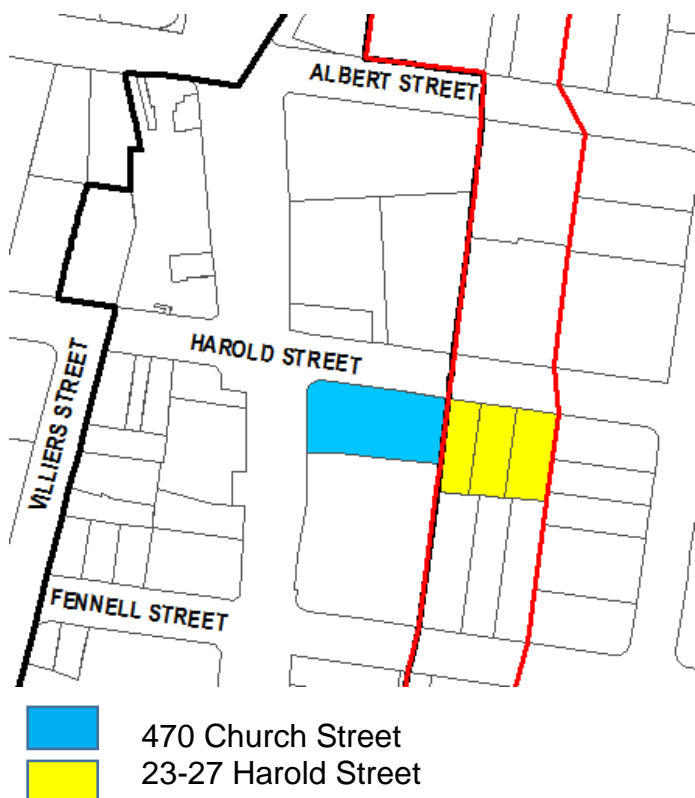


Figure 3 – Site-specific Planning Proposals within and adjacent to the Study Area

19. The changes to the planning controls sought via the SSPP for 470 Church Street of an FSR of 6:1 and height of 80 metres (25 storeys) were endorsed by Council on 9 December 2019 and are now at the finalisation stage, nearing completion. This site is located just outside the North-East PIA adjacent to its western boundary.

20. The SSPP for 23-27 Harold Street is seeking an amendment to the planning controls to allow an FSR of 6:1 and height of 70 metres (22 storeys). On the 9 June 2020, Council considered a report on the SSPP and resolved to defer progressing the SSPP until Council had adopted a Planning Strategy for the PIA containing the subject site. This site is located within the North-East PIA.

Planning and urban design challenges

21. Given the precinct's location in between a proposed high rise corridor on Church Street (under the Parramatta CBD Planning Proposal) and low scale built form in the Sorrell Street HCA, there are a number of competing strategic priorities which ultimately may influence its future. These competing strategic priorities result in cases that can be made for both higher and lower built forms in this precinct, which are summarised generally below.
22. The case for **higher built forms** is summarised as follows:
- Close to Parramatta CBD Planning Proposal area (with 80m height and 6:1 FSR on Church Street).
 - Close to new Fennell Street Light Rail Stop – opportunity for better land use/transport integration.
 - More likely to encourage urban renewal, given high concentration of existing older style, strata-subdivided residential flat buildings.
23. The case for **lower built forms** is summarised as follows:
- Close proximity to the Sorrell Street HCA.
 - Mid-block sites – high-rise likely to adversely impact neighbours.
 - Allows for a better visual transition between the CBD edge and the Heritage Conservation Area.
24. The planning controls for the six built form options presented in the Draft Planning Strategy for the North-East PIA are summarised in Table 1 below, as follows:

Table 1: The FSRs and heights of the six (6) built form options in the Draft Planning Strategy for the North-East PIA

Option	FSR	Height	Maximum Height with Design Excellence (DE)*
Option 1	0.8:1 (existing as per PLEP 2011)	11m (existing as per PLEP 2011)	-
Option 2	2:1	28m (8 storeys)	-
Option 3	3:1 plus DE	40m (12 storeys)	46m (14 storeys)
Option 4	4:1 plus DE	54m (17 storeys)	62.1m (20 storeys)
Option 5	5:1 plus DE	67m (20 storeys)	77.1m (23 storeys)
Option 6^	6:1 plus DE	80m (25 storeys)	92m (29 storeys)

***Note:** Draft amendments to clause 7.10 in PLEP 2011 under the Parramatta CBD Planning Proposal propose a design completion be required where a building is proposed to be 40m or higher and 15% bonus FSR and height be awarded if Design Excellence (DE) is achieved.

^Note: In relation to Option 6 (FSR 6:1), the *Parramatta CBD Planning Proposal* also allows development with an FSR of 6:1 or greater to access a 5% 'high performing buildings' (HPB) bonus FSR (subject to minimum site area and width requirements). If development was to do this, 1-2 additional floors might be able to be achieved, however this would still need to be contained within the maximum 92m DE height (as the HPB bonus does not apply to height, only FSR). For consistency, application of a HPB bonus has not been modelled in this analysis for Option 6, although if it were to be added, its impacts would be marginal.

Economic Considerations

25. The focus of this Draft Planning Strategy is to seek community feedback on the built form options and acknowledging the work undertaken in previous heritage studies. The land economics of the built form options will be subject to detailed economic feasibility analysis given the high concentration of land parcels (60%) that contain strata-subdivided residential flat buildings. This can represent challenges for redevelopment given the involvement of multiple land owners and the need to acquire individual apartments in order to secure a development site. Prior to finalising the Draft Planning Strategy, Council will undertake an economic feasibility study so as to ensure this issue is also addressed and considered in determining a preferred built form option for the precinct.

Illustration of the built form options

26. **Figures 4 to 9** below illustrate the six built form options in line with the planning controls detailed in **Table 1** above. The Draft Planning Strategy at **Attachment 1** contains each of these options, as well as further details and illustrations of each option, and provides background information about the urban design modelling that generated the illustrations. The buildings coloured white in each figure indicate the possible built form outcomes in line with the draft planning controls in the Parramatta CBD Planning Proposal recently on public exhibition. This area is outside of, but directly adjacent to, the PIA.
27. Option 1 (**Figure 4**) illustrates the built forms that closely reflect the current planning controls in the Parramatta LEP 2011 - these buildings are coloured blue in that figure. Options 2 to 6 (**Figures 5 to 9**) illustrate possible planning controls – these buildings are coloured dark grey in each of those figures. The additional height that is possible for each building (Options 3 to 6) where design excellence is awarded is included in the building heights in the images and shown as translucent grey.



Figure 4 – Option 1 – FSR 0.8:1 – Aerial view over Victoria Road looking north-west



Figure 5 – Option 2 – FSR 2:1 – Aerial view over Victoria Road looking north-west



Figure 6 – Option 3 – FSR 3:1 – Aerial view over Victoria Road looking north-west



Figure 7 – Option 4 – FSR 4:1 – Aerial view over Victoria Road looking north-west



Figure 8 – Option 5 – FSR 5:1 – Aerial view over Victoria Road looking north-west



Figure 9 – Option 6 – FSR 6:1 – Aerial view over Victoria Road looking north-west

CONSULTATION & TIMING

Councillor Consultation

28. A Councillor workshop on the Draft Planning Strategy and the built form options was held on 7 October 2020. This workshop was held in accordance with Council’s resolution of 9 June 2020 in relation to this matter. The feedback received at the workshop has been considered by Council officers in preparing both this report and the Draft Planning Strategy and is summarised in the table below.

Date	Councillor	Councillor Comment	Council Officer Response	Responsibility

7 October 2020	Councillor workshop	<ul style="list-style-type: none"> • General questions about previous heritage studies • General questions and clarification sought about the built form options, including application of the design excellence bonus • Discussion about consultation methodology 	Councillor feedback noted and incorporated into the Council report and Draft Planning Strategy, including amending the images to clarify the design excellence bonus and specifying the consultation program	Group Manager City Planning
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Community/Stakeholder Consultation

29. Subject to endorsement by Council, the Draft Planning Strategy for the North-East PIA at **Attachment 1** will be placed on public exhibition for a minimum period of 28 days. The Draft Planning Strategy will include all six (6) built form options as articulated in this report, to enable the community and other stakeholders to have their say on the full range of built form outcomes for this area prior to Council making a decision on the matter.
30. Public exhibition will include the following engagement tools and methods at a minimum:
- a. Notification letters to landowners and occupiers (including owners and occupiers of individual apartments within strata buildings) inside the North-East PIA boundary; and landowners and occupiers within a 200m buffer of the North-East PIA boundary;
 - b. Consultation with Council's Heritage Advisory Committee;
 - c. Consultation with relevant public authorities, including the Department of Planning, Industry and Environment (DPIE), Transport for NSW and the NSW Heritage Office;
 - d. Copy of the exhibition documents at Council's Customer Service Centre and Parramatta Library;
 - e. Public notice on City of Parramatta corporate website, and 'Participate Parramatta' City of Parramatta Council website; and
 - f. Free text response to enable an online submission.
31. Following the public exhibition period, Council will consider all feedback received and undertake further technical analysis, including a separate economic feasibility study for the precinct, which will consider the nature of existing development and the proposed built form options. Council will also do an assessment of the options using the weighted assessment criteria described in Section 7 of the Draft Planning Strategy for the North-East PIA. This work will then inform a final, preferred option for the PIA. It is intended that the outcomes of the exhibition will be reported to Council in early-mid 2021.

32. Once a final Planning Strategy has been adopted by Council, this will then guide site-specific planning proposals for sites within the PIA. Such site-specific planning proposals are likely to require their own supporting technical studies.

FINANCIAL IMPLICATION FOR COUNCIL

33. Preparation of this report and the Draft Planning Strategy, including the built form options, has been undertaken internally by Council officers within existing staff budgets.
34. Costs associated with the exhibition and finalisation of the Draft Planning Strategy will be covered by the existing City Planning Unit budget for 2020/21. This includes the cost of undertaking a separate economic feasibility study.

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ATTACHMENTS:

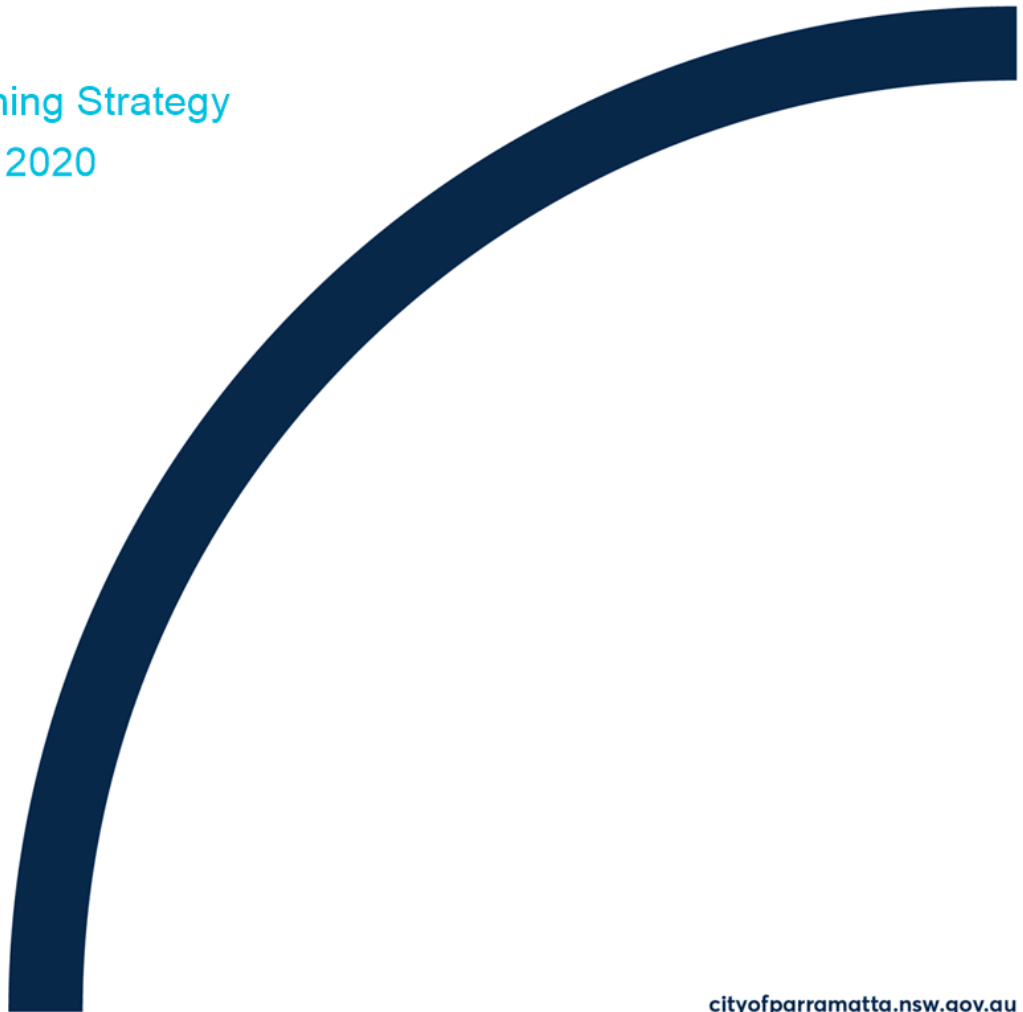
1 ↓ Council Report - North-East PIA - Draft Strategy - FINAL for Council report 221020	43 Pages
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REFERENCE MATERIAL



North-East Planning Investigation Area

Draft Planning Strategy
November 2020



cityofparramatta.nsw.gov.au



North-East Planning Investigation Area

Draft Planning Strategy
November 2020

cityofparramatta.nsw.gov.au

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1. Executive Summary

The North-East Planning Investigation Area (PIA) is located on the north-eastern fringe of the Parramatta CBD. The properties within the North-East PIA are located between the land parcels fronting Church Street to the west and the Sorrell Street Heritage Conservation Area (HCA) to the east in Parramatta/North Parramatta, and extend from Isabella Street in the north to Ross Street in the south.

This Draft Planning Strategy for the North-East PIA presents six (6) built form options for feedback. The final preferred option will be determined in the post-exhibition period, once Council has considered all feedback and undertaken further analysis if required. The final Planning Strategy for the North-East PIA will guide site-specific planning proposals within the PIA.

The planning controls for the six built form options in this Draft Planning Strategy represent a range between the existing floor space ratio (FSR) control of 0.8:1 under *Parramatta Local Environmental Plan LEP 2011* and the highest floor space ratio control of 6:1 recommended in a heritage study, given the adjoining HCA.

The built form options consider planning, urban design, heritage and overshadowing analysis undertaken to inform the *Parramatta CBD Planning Proposal* (given the PIA was previously part of that proposal), previous Council resolved positions for the study area and site-specific Planning Proposals. The Strategy details these considerations and includes new site analysis and urban design modelling that has informed the Draft Planning Strategy and these options.

The land parcels within the North-East PIA were originally part of the *Parramatta CBD Planning Proposal* boundary, however following a resolution of Council on 25 November 2019 they were excised for future planning consideration as part of the Planning Investigation Area work. A number of Planning Investigation Areas on the fringes of the Parramatta CBD were first identified in the *Parramatta CBD Planning Strategy* (2015), and then added to by way of a Council resolution in 2019.

A further resolution of Council on 9 June 2020 (relating to a site-specific planning proposal within the PIA) required a Draft Planning Strategy for the North-East PIA to be prepared and reported to Council for endorsement to go on public exhibition.

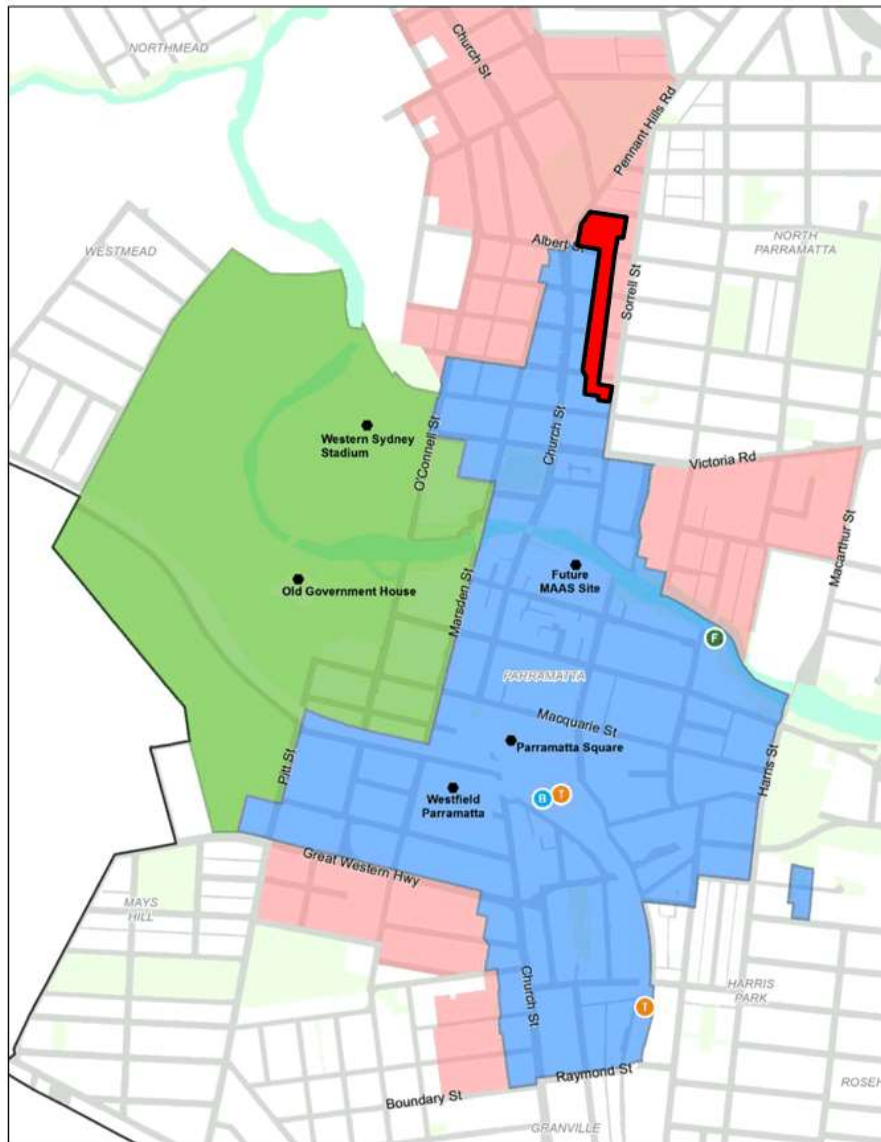
On **[INSERT DATE]**, Council resolved to endorse this Draft Planning Strategy for the purposes of public exhibition to seek feedback from the community and stakeholders on the six built form options for the North-East PIA presented in this Strategy.

Following the public exhibition of the six built form options within this Draft Planning Strategy, a subsequent report will be prepared to Council detailing the outcomes of the public exhibition period, outcomes of an economic feasibility study and also an assessment of each of the built form options against the weighted assessment criteria described in Section 7 of this strategy. The report will include an updated Draft Planning Strategy (including a single, preferred built form option) that incorporates the findings of this additional analysis and also community input.

2. Introduction

This Draft Planning Strategy for the North-East Planning Investigation Area (PIA) does the following:

- Describes the North-East PIA study area and surrounding context (see **Section 3 – Study Area**)
- Outlines the planning, urban design, heritage and overshadowing analysis work undertaken to inform the *Parramatta CBD Planning Proposal* (to which this PIA was previously a part of) and previous Council resolved positions for the study area and site-specific Planning Proposals (see **Section 4 - Background**)
- Describes the planning challenges for the precinct, including competing strategic priorities (see **Section 5 – Planning Challenges**)
- Visually illustrates six potential built form outcomes for the PIA and describe the resulting planning controls (see **Section 6 – Built Form Options**)
- Summarises the built form options for community and stakeholder consultation (see **Section 6 – Form Options**)
- Describes the weighted assessment criteria that will be used to assess each of the built form options in the post-exhibition period (see **Section 7 – Preferred Built Form Strategy**).
- Details suggested future work and next steps (see **Section 8 – Future work and next steps**).



- CBD Planning Proposal – area where changes to the controls are proposed
- CBD Planning Proposal – land parcels not subject to any change
- Planning Investigation Areas – to be considered in the future
- North-East Planning Investigation Area boundary – subject of this Planning Strategy

Figure 1 - The North-East Planning Investigation Area in relation to the wider Parramatta CBD area and surrounding context.

3. Study Area

The Study Area for the Draft Planning Strategy for the North-East Planning Investigation Area is shown below in **Figure 2**.



Figure 2 - North-East Planning Investigation Area and surrounding context.

The properties within the North-East Planning Investigation Area (PIA) are located between the land parcels fronting Church Street to the west and the Sorrell Street Heritage Conservation Area to the east in Parramatta/North Parramatta, and extends from Isabella Street in the north to Ross Street in the south. **Figure 6** below includes a number of site photos of Church Street, Sorrell Street and the North-East PIA.

There are 25 land parcels within the North-East PIA comprising seven dwellings, two residential flat buildings in single ownership, one commercial strata building and 15 strata plan residential flat buildings. The land parcels generally have a street frontage to the east-west running streets being Isabella Street, Albert Street, Harold Street, Fennell Street and Grose Street. Of the 17 residential flat buildings in the North-East PIA, most (14) are older building types from the 1960s, 1970s and 1980s. The remaining three residential flat buildings are from 1990s (1) and 2000s (2). The existing building typologies and ages of the dominant building type (residential flat buildings) are illustrated in **Figures 3 and 4** below.



Figure 3 – Existing building typologies in the study area

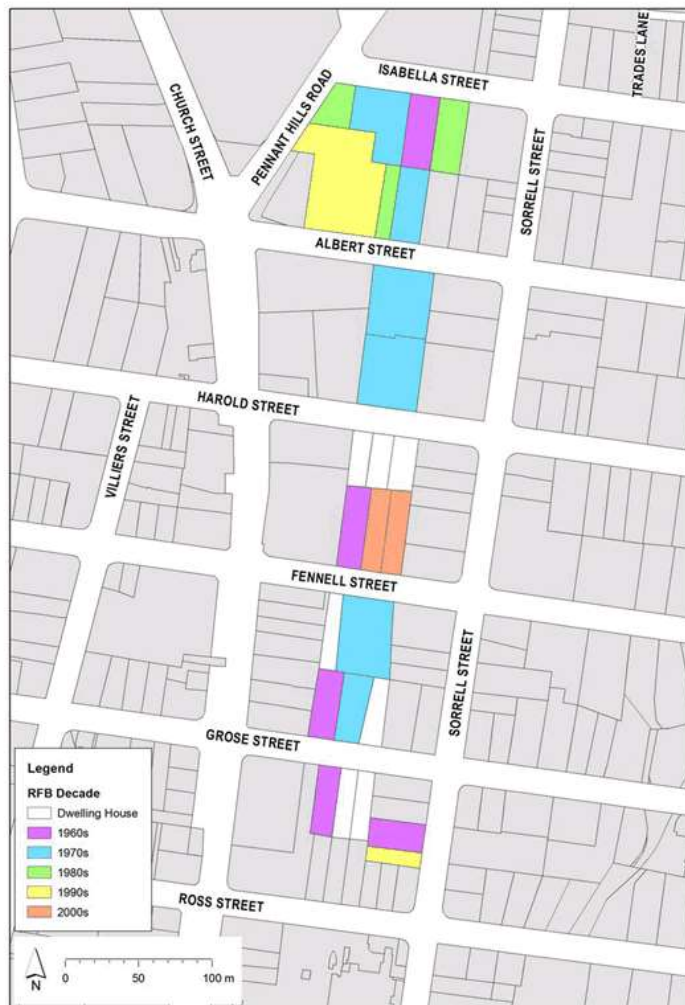


Figure 4 – Age of existing residential flat buildings in the study area.

Land to the west of the study area along Church Street contains generally one to two storey attached commercial buildings with some freestanding built forms. Some newer mixed-use residential buildings between 8 to 14 storeys are generally located on corner sites. The topography of Church Street rises from the River to Pennant Hills Road. Church Street will be a high-rise corridor (up to 29 storeys) under the *Parramatta CBD Planning Proposal*.

Land to the east of the study area along Sorrell Street contains predominantly single dwellings, both attached and freestanding from the mid-19th to early 20th Century. The avenue of mature trees along Sorrell Street and landscaped frontages generally screen the 2 to 3 storey older style residential flat buildings located on the western side of Sorrell Street. There are a number of heritage items along Sorrell Street with the land parcels on both sides of the street within the Sorrell Street Heritage Conservation Area.

Construction of the Parramatta Light Rail line is currently underway along Church Street. This includes the construction of a new Light Rail Stop on Church Street at the intersection with

Fennell Street, which is in the immediate vicinity of the North-East Planning Investigation Area. Once operational from 2023, Parramatta Light Rail will deliver frequent 'turn-up-and-go' services every 7.5 minutes during peak hours, operating 7 days per week from 5:00am to 1:00am¹. Introduction of the new light rail service, in particular the Light Rail Stop at Fennell Street, presents a significant opportunity for urban transformation of this surrounding precinct to create better land use and transport integration.

¹Source: Parramatta Light Rail website - <http://www.parramattalightrail.nsw.gov.au/parramatta-north>



Figure 5 - Artist's impression of light rail on Church Street at Prince Alfred Square, just south of the Fennell Street Stop and the study area (Source: Parramatta Light Rail website: <http://www.parramattalightrail.nsw.gov.au/parramatta-north>)







Figure 6 – Images of Church Street, Sorrell Street and the North-East PIA

4. Background

Planning Investigation Areas

Planning Investigation Areas (PIAs) were first identified within the *Parramatta CBD Planning Strategy* prepared in 2015 and are shown in **Figure 7** below. The purpose of the *Parramatta CBD Planning Strategy* was to identify a vision for growth for the Parramatta CBD and to outline the issues to be investigated and technical studies to be undertaken to inform the preparation of a planning proposal to amend the planning controls in the *Parramatta Local Environmental Plan 2011* to achieve the vision. This planning proposal was subsequently prepared following technical study work and became known as the *Parramatta CBD Planning Proposal*.

In addition to setting the framework for the *Parramatta CBD Planning Proposal*, the *Parramatta CBD Planning Strategy* (2015) also identifies three PIAs on the fringes of the Parramatta CBD to be considered as part of the potential future expansion of the Parramatta CBD. The *Parramatta CBD Planning Strategy* identified that detailed planning analysis was required together with urban design and economic studies to inform the future land use and built form in these areas. The results of this work would then likely inform the preparation of a planning proposal (separate to the *Parramatta CBD Planning Proposal*) to amend the planning controls for the land parcels within the PIAs.

Council on 12 September 2016 considered a report that detailed the pending planning outcomes relating to the *Parramatta CBD Planning Proposal* that would influence the progression and recommendations of the PIAs and resolved as follows:

'That Council approve the technical work required to be undertaken for the three Planning Investigation Areas identified in the Parramatta CBD Planning Strategy be deferred, pending the completion of the public exhibition of the Parramatta CBD Planning Proposal.'

The *Parramatta CBD Planning Proposal* received a Gateway determination from the Department of Planning, Industry and Environment (the Department) on 13 December 2018. The Planning Proposal and the supporting technical studies were subsequently updated in response to the conditions of the Gateway determination.

Council at its meeting of 25 November 2019 endorsed an updated *Parramatta CBD Planning Proposal* to proceed to public authority consultation in line with Condition 2 of the Gateway determination (which was the next key milestone in the progression of the Planning Proposal prior to the wider public exhibition) with some amendments to the Parramatta CBD boundary. Council resolved to remove certain areas from the *Parramatta CBD Planning Proposal*, which would allow further analysis of potential impacts on heritage items, conservation areas, and open space to be undertaken at a later stage. The specific parts of Council's resolution read as follows:

(a)(vi) Amend the Proposal so as to remove the three areas zoned R4 High Density Residential (as shown on the Proposed Land Zoning Map) and that these areas be included in the future work on the 'Planning Investigation Areas' as per the Parramatta CBD Planning Strategy.

(g) That Council endorse the removal of the area south of the Proposal boundary, bound by Great Western Highway and north of Lennox and Lansdowne Streets, and east of Marsden Street, Parramatta from the Proposal, and that this area be included in the future work on the Planning Investigation Areas as per the Parramatta CBD Planning Strategy.

The Planning Proposal was updated to reflect the resolution of Council from 25 November 2019. This resulted in the Planning Proposal land application boundary being amended to exclude the

above areas and included changes to the associated maps and draft LEP provisions. Specifically, the areas removed are shown in red in **Figure 8**.

The land parcels between Church Street and the Sorrell Street Heritage Conservation Area in Parramatta/North Parramatta are one of the four areas removed, with this particular area now known as the 'North-East Planning Investigation Area' and being the land that is the subject of this Draft Planning Strategy.

Whilst the resolution from 12 September 2016 relates to the original PIAs identified within the *Parramatta CBD Planning Strategy*, the resolution from 25 November 2019 requires the four removed areas shown in red in **Figure 8** to be included as part of the PIA work. The investigation work in these areas originally was planned to commence following completion of the public exhibition process of the *Parramatta CBD Planning Proposal* in accordance with Council's resolution from 12 September 2016.

However, a Council resolution on a site-specific Planning Proposal for 23-27 Harold Street, Parramatta, which is located within the 'North-East Planning Investigation Area', considered at the Council Meeting on 9 June 2020 has altered the work program. The resolution in relation to this matter included the decision to defer progressing the site-specific Planning Proposal for 23-27 Harold Street until Council had adopted a Planning Strategy for the Planning Investigation Area containing the subject site (i.e. the North-East Planning Investigation Area). The relevant parts of Council's resolution read as follows:

- a) **That** as a result of Council's resolution of 25 November 2019 to excise areas currently zoned R4 High Density Residential from the Parramatta CBD Planning Proposal, Council defer progressing the Planning Proposal that is the subject of this report until Council has adopted a planning strategy for the planning investigation area containing the subject site.
- b) **That** Council note that work on the planning investigation area between Church Street and the Sorrell Street Heritage Conservation Area will be the subject of a Councillor workshop before a draft planning strategy is reported to Council for its consideration in October 2020, for the purposes of public exhibition.
- c) **Further, that** the Department of Planning, Industry and Environment be advised of Council's resolution on this matter.

In accordance with the above Council resolution, a Councillor workshop on this Draft Planning Strategy was held on 7 October 2020. The Strategy was subsequently reported to Council on **[Insert meeting date]** where it was resolved as follows:

[Resolution to be inserted following the Council meeting]

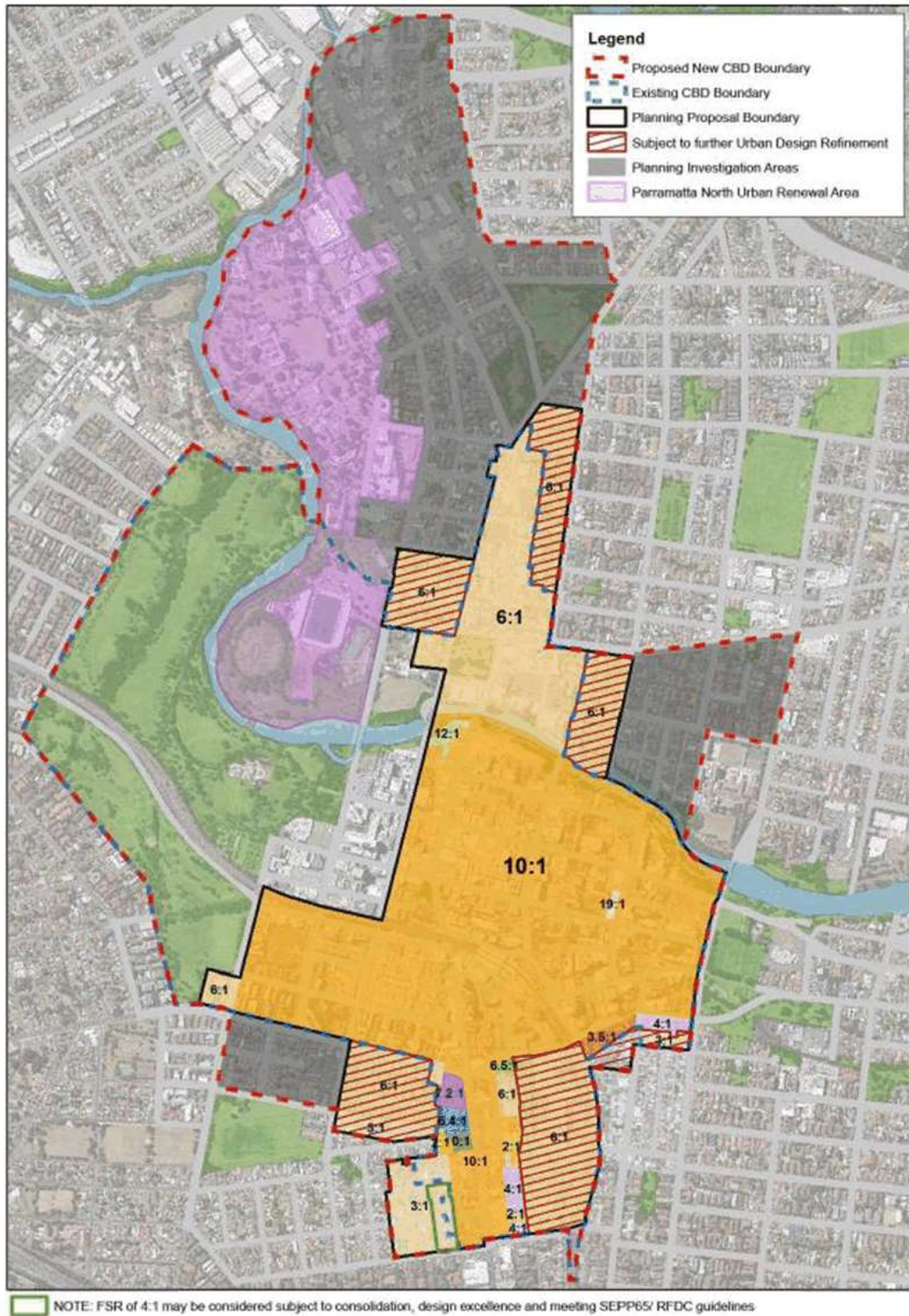


Figure 7 - Planning Investigation Areas as originally identified within the Parramatta CBD Planning Strategy (2015) – shown in grey colouring

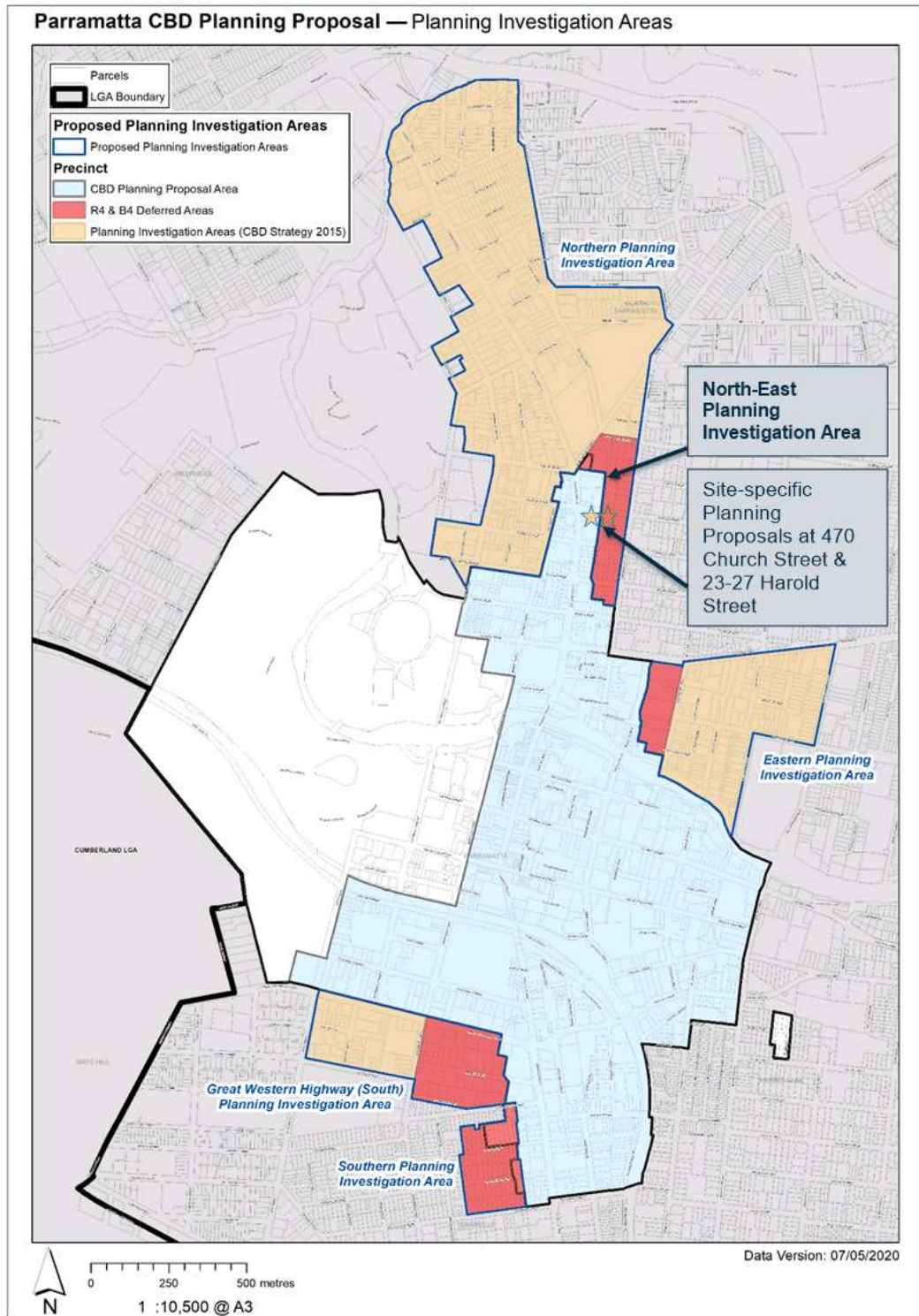


Figure 8 – Additional Planning Investigation Areas as a result of areas removed from the Parramatta CBD Planning Proposal

Heritage and Overshadowing Studies that informed the Parramatta CBD Planning Proposal

Heritage Studies

The *Parramatta CBD Planning Strategy* (2015) identified a number of technical studies needed to inform the preparation of new planning controls for the Parramatta CBD including a heritage study. A heritage study was required to address the Planning Directions in the *Environmental Planning and Assessment Act 1979*, which at this time were referred to as section 117 Directions and are now referred to as section 9.1 Directions.

To satisfy this requirement, Council commissioned consultants Urbis to prepare a heritage study for the Parramatta CBD to inform the Parramatta CBD Planning Proposal and facilitate the conservation and management of listed items, areas, objects and places of environmental heritage significance and indigenous heritage significance.

The *2015 Urbis Heritage Study* of the Parramatta CBD investigated heritage matters for the entire *Parramatta CBD Planning Proposal* boundary and provided recommendations for the protection of heritage while supporting the vision for growth. At the time of the preparation of the Urbis Heritage Study, the area now known as the North-East PIA was part of the *Parramatta CBD Planning Proposal*.

The 2015 Urbis Heritage Study recommended for the area now subject to this Draft Planning Strategy a floor space ratio (FSR) of 3:1, with a 6:1 FSR along Church Street (generally) and 0.8:1 FSR within the Sorrell Street HCA as shown in **Figure 9**. This in effect creates a "stepping down" transition to the HCA.

On 14 December 2015, Council considered a report on the draft Parramatta CBD Planning Proposal and resolved not to support a 3:1 FSR for the subject area, rather an FSR of 6:1 for the transitional areas (interface areas) on the fringe of the CBD as shown in **Figure 10**.

A further heritage study of the 'interface areas' in response to matters raised by the Department of Planning, Industry and Environment (DPIE) and Heritage Council of NSW arising during the assessment of certain site-specific planning proposals was required to be undertaken. The interface areas within the Parramatta CBD are located generally between the Parramatta CBD core and heritage conservation / lower scale residential areas and included the area that now contains the North-East PIA.

Council commissioned consultants Hector Abrahams Architects (HAA) to undertake a review of the planning controls for the interface areas. The *2017 HAA Heritage Study of Interface Areas* recommended amendments to the *2015 Urbis Heritage Study* approach for sites within the interface areas of the CBD PP; and a new heritage provision to apply to the entire CBD PP area to ensure the relationships between heritage items and development sites are conserved and managed.

The *2017 HAA Heritage Study of Interface Areas* recommended for the area now subject to this Draft Planning Strategy a floor space ratio (FSR) of 6:1, with a 6:1 FSR along Church Street (generally) and 0.6:1 FSR within the Sorrell Street HCA as shown in **Figure 11**. This in effect allows for taller built form outcomes adjacent to the HCA, but these need to be appropriately setback from the HCA to allow for mature tree planting so as to preserve the historic setting.

On 10 July 2017, Council considered a report on the *2017 HAA Heritage Study of Interface Areas* and resolved to support the 6:1 FSR for the subject area.

On 13 December 2018, the Department issued a Gateway Determination allowing the Parramatta CBD Planning Proposal to proceed to the next stage in the process, subject to conditions, including a condition to submit additional information for clarification and/or evidence to support the planning proposal before public exhibition. Condition 1(k) (i) of the Gateway determination stated:

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

Gateway Condition 1(k) (i) required Council to identify inconsistencies between the endorsed planning controls in the *Parramatta CBD Planning Proposal* and the recommended planning controls in the 2015 *Urbis Heritage Study* and 2017 *HAA Heritage Study of Interface Areas* and recommend how any inconsistencies will be addressed.

In relation to the North-East PIA, there were no inconsistencies between the 2017 *HAA Heritage Study of Interface Areas* recommendations for the study area and the Council resolved position in the *Parramatta CBD Planning Proposal* at that time, and therefore no further work was required to be undertaken by Council in relation to the Gateway condition for this area. It is also noted that the Department commissioned their own separate Heritage Study (2018) that was prepared by consultants GML, which recommended no change to the FSR control of 0.8:1 for this area (see **Figure 12**), however this position was never formally endorsed by DPIE nor was it reflected in their Gateway determination conditions for the *Parramatta CBD Planning Proposal*.

A summary of the evolution of the draft planning controls follows in **Figures 9 to 13** below.



Overshadowing analysis

The Gateway Determination issued by DPIE for the *Parramatta CBD Planning Proposal* in December 2018 included a condition requiring cumulative overshadowing analysis of solar access to the southern Heritage Conservation Areas (HCAs). These included the Harris Park [West] HCA, the Experiment Farm HCA and the Tottenham Street HCA, with the condition requiring these areas to receive a minimum of two hours' direct sunlight between 9am and 3pm at midwinter (21 June). Pursuant to feedback from a previous Councilor workshop, testing was also undertaken on the North Parramatta and Sorrell Street HCAs.

Overshadowing analysis for this investigation area was undertaken at the proposed 6:1 FSR, with a corresponding building height of 92m (or approximately 29 storeys). The overshadowing testing looked at shadows cast between 9am and 3pm on 21 June (mid-winter) at 30-minute intervals (e.g. 9am, 9:30am, 10:00am, etc.). The acceptable threshold, consistent with Condition 1(k)(ii) of the Gateway Determination, was to ensure properties in the Sorrell Street HCA were able to receive at least 2 hours of sunlight between 9am and 3pm on 21 June.

Given the location of the Planning Investigation Area being to the immediate west of the Sorrell Street HCA, and no high-rise development directly to the east or north of the HCA, this threshold test was easily met as shadows from the investigation area did not impact the HCA before 12 noon on 21 June. Shadows from the Planning Investigation Area began to overshadow the HCA from 12 noon and continued into the afternoon, as shown in **Figure 14**.

The overshadowing analysis undertaken by Council indicated that land parcels in the North Parramatta and Sorrell Street HCAs could meet the minimum sunlight access threshold in the Gateway determination condition. This was due to the generally lower incentive height of building controls north of the river (compared to the core) combined with their location at the northern fringes of the *Parramatta CBD Planning Proposal* area, which were not as impacted by shadows being cast. Therefore, heights and FSRs for this area were not required to be lowered to meet this condition at that time.

Full details of this analysis are included within the *Overshadowing in the Parramatta CBD Technical Paper* currently on exhibition with the Parramatta CBD Planning Proposal – refer to Appendix 10A of the exhibition documents.

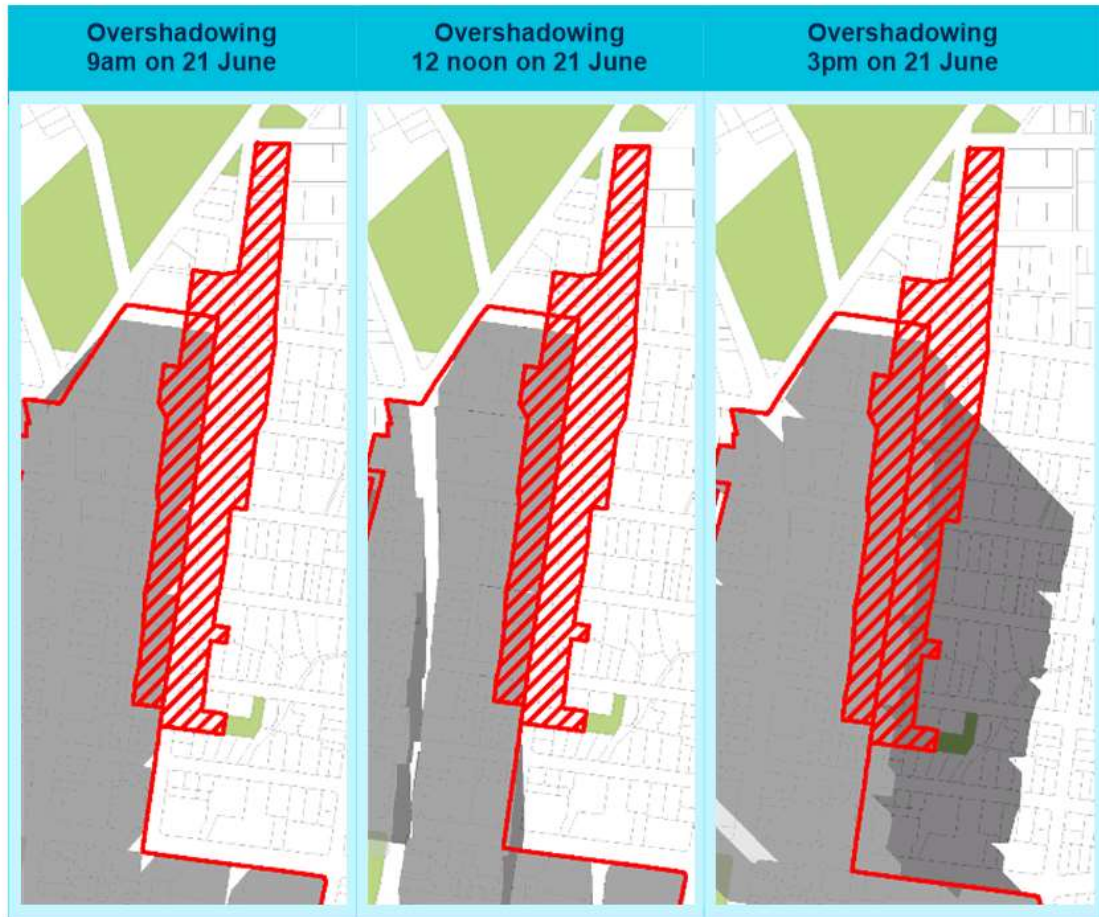


Figure 14: Overshadowing testing of 92m high buildings to the Sorrell Street HCA at 9am (left), 12 noon (centre) and 3pm (right) on 21 June.

When considering the testing undertaken that looked at the maximum height considered of 92m with the originally proposed 6:1 FSR, any reduction in proposed FSR to the investigation area will be accompanied by a corresponding reduction in potential building height and consequent impacts to the Sorrell Street HCA and properties to the east.

Site-Specific Planning Proposals

There are two site-specific planning proposals (SSPPs) that are relevant to the consideration of the built form outcomes for the North-East PIA, being the SSPP at 470 Church Street (adjacent to the PIA) and the SSPP at 23-27 Harold Street (within the PIA) identified in **Figure 15**.

The SSPP for 23-27 Harold Street is seeking an amendment to the planning controls to allow an FSR of 6:1 and height of 70m (22 storeys). On the 9 June 2020, Council considered a report on the SSPP and resolved to defer progressing the SSPP until Council had adopted a Planning Strategy for the PIA containing the subject site. This site is located within the North-East PIA.

The changes to the planning controls sought via the SSPP for 470 Church Street with an FSR of 6:1 and height of 80 metres (25 storeys) was endorsed by Council on 9 December 2019 and is now at the finalisation stage, nearing completion. This site is located just outside the North-East PIA adjacent to its western boundary.



Figure 15: SSPPs located within and adjacent to the North-East PIA boundary

5. Planning Challenges

Given the North-East PIA's location between a proposed high rise corridor on Church Street (under the *Parramatta CBD Planning Proposal*) and low scale built form in the Sorrell Street Heritage Conservation Area (HCA), there are a number of competing strategic priorities which ultimately may influence its future (refer to **Figure 16** below). These competing strategic priorities result in cases that can be made for both higher and lower built forms in this precinct, which are summarised generally below.

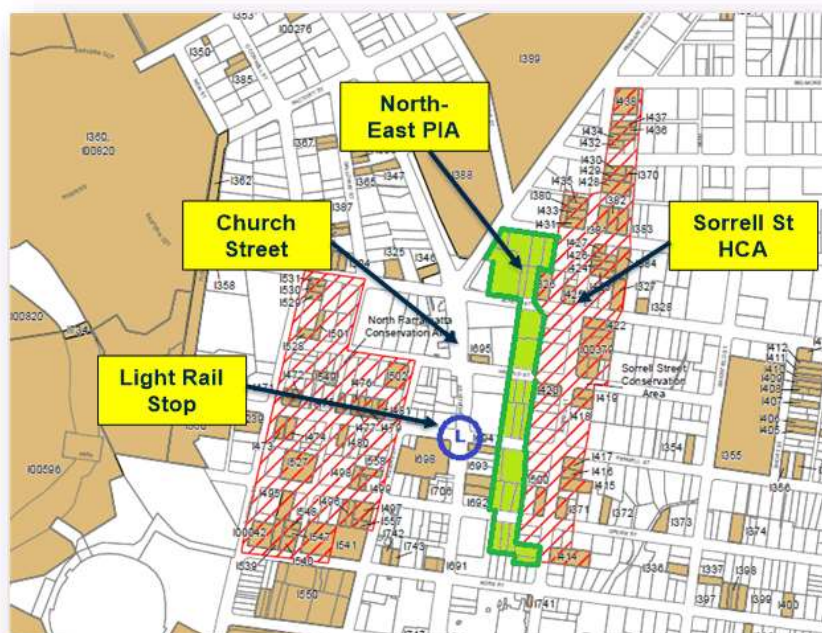


Figure 16 – Location of North-East PIA adjacent to Sorrell Street HCA, Church Street and new Light Rail Stop (under construction)

The case for **higher built forms** is summarised as follows:

- Close to Parramatta CBD Planning Proposal area (with 80m height and 6:1 FSR on Church Street).
- Close to new Fennell Street Light Rail Stop – opportunity for better land use/transport integration.
- More likely to encourage urban renewal, given high concentration of existing older style, strata-subdivided residential flat buildings.

The case for **lower built forms** is summarised as follows:

- Close proximity to the Sorrell Street HCA.
- Mid-block sites – high-rise likely to adversely impact neighbours.
- Allows for a better visual transition between the CBD edge and the HCA.

Given the competing strategic priorities for this precinct, Council has prepared a number of potential built form options, which test a range of potential densities and heights. These six (6) built form options are presented in the next section of this Draft Planning Strategy. The planning controls for these options are summarised in **Table 1** below, as follows:

Option	FSR	Height	Maximum Height with Design Excellence (DE)*
Option 1	0.8:1 (existing as per PLEP 2011)	11m (existing as per PLEP 2011)	-
Option 2	2:1	28m (8 storeys)	-
Option 3	3:1 plus DE	40m (12 storeys)	46m (14 storeys)
Option 4	4:1 plus DE	54m (17 storeys)	62.1m (20 storeys)
Option 5	5:1 plus DE	67m (20 storeys)	77.1m (23 storeys)
Option 6 [^]	6:1 plus DE	80m (25 storeys)	92m (29 storeys)

***Note:** Draft amendments to clause 7.10 in *Parramatta LEP 2011* under the *Parramatta CBD Planning Proposal* propose a design competition be required where a building is proposed to be 40m or higher and 15% bonus FSR and height be awarded if Design Excellence (DE) is achieved.

[^]**Note:** In relation to Option 6 (FSR 6:1), the *Parramatta CBD Planning Proposal* also allows development with an FSR of 6:1 or greater to opt in to access a 5% 'high performing buildings' (HPB) bonus FSR (subject to minimum site area and width requirements). If development was to do this, 1-2 additional floors might be able to be achieved, however this would still need to be contained within the maximum 92m DE height (as the HPB bonus does not apply to height, only FSR). For consistency, application of a HPB bonus has not been modelled in this analysis for Option 6, although if it were to be added, its impacts would be marginal.

Table 1: The FSRs and heights of the six (6) built form options in the Draft Planning Strategy for the North-East PIA

Economic Considerations

The focus of this Draft Planning Strategy is on urban design options and acknowledging the work undertaken in previous heritage studies. However, as was highlighted in the 'Study Area' section of this Draft Planning Strategy, there is a high concentration of land parcels (60%) within the PIA that contain strata-subdivided residential flat buildings. This can represent significant challenges for redevelopment given the involvement of multiple land owners and the need to acquire individual apartments in order to secure a development site. Developers may need to purchase land at a premium above market value, and this will affect the overall land economics in ensuring redevelopment is feasible.

Prior to finalising the Draft Planning Strategy, Council will undertake an economic feasibility study to ensure this issue is addressed and considered when determining a preferred built form option for the precinct.

6. Built Form Options

Under the current controls in the *Parramatta LEP 2011* the North-East PIA is zoned R4 High Density Residential and has an FSR of 0.8:1 and a height limit of 11m. This would generally allow for 3 storey residential flat buildings.

Under the *Parramatta CBD Planning Proposal*, which was recently placed on public exhibition, the adjoining area to the west of the North-East PIA, being land along Church Street, is proposed to have an FSR of 6:1 and height limit of 80m, which would increase to an FSR of 7.2:1 and a height of 92m when design excellence and high performing buildings bonuses are included. The area is also proposed to be zoned B4 Mixed Use under the *Parramatta CBD Planning Proposal*, which would allow for high rise mixed-use residential or commercial towers along Church Street.


Under the current controls in the *Parramatta LEP 2011*, the area immediately to the east of the North-East PIA, being the Sorrell Street HCA, is zoned R3 Medium Density Residential, has an FSR of 0.6:1 and height limit of 11m. This would generally allow for medium density housing forms that would need to be consistent with the low scale character of the HCA.

Given that the North-East PIA is located between a proposed high rise zone and also a low scale HCA, careful consideration is needed of the transition in built form in this area. Given this, Council has undertaken urban design modelling to prepare the following six (6) built form options within the North-East PIA.

A note about the built form options


- The images below illustrate the six built form options in line with the planning controls detailed in **Table 1** in the previous section of this Draft Planning Strategy.
- The buildings coloured white in each option indicate the possible built form outcomes in line with the draft planning controls in the *Parramatta CBD Planning Proposal* which was recently placed on public exhibition. This area is outside of, but directly adjacent to, the North-East PIA.
- Option 1 illustrates the built forms that closely reflect the current planning controls in the *Parramatta LEP 2011* - these buildings are coloured blue in that option.
- Options 2 to 6 illustrate possible planning controls – these buildings are coloured dark grey in each of those options. The additional height that is possible for each building (Options 3 to 6) where design excellence is awarded is included in the building heights in the images and is shown as translucent grey.
- **Appendix 1** outlines the assumptions for the modelled built form outcomes presented in this Planning Strategy and **Appendix 2** compares the built form options from varying viewpoints.

Option 1 - FSR 0.8:1, Height - 11m (3 storeys)



- Low scale development
- Generous deep soil zones within front setbacks
- Consistent with similar periphery areas with heritage interface areas
- Unlikely to encourage redevelopment opportunities

Option 2 - FSR 2:1, Height - 28m (8 storeys)



- Generous deep soil zones within front setbacks
- Opportunities for communal open space
- Consistent with similar periphery areas with heritage interface areas
- Appropriate height transition between the Sorrell Street HCA and broader Parramatta CBD
- Mitigates visual and environmental impact from the broader Parramatta CBD

Option 3 - FSR 3:1 plus DE, Height - 40m (12 storeys) and Height with DE - 46m (14 storeys)




- Potential for provision of communal open space
- Provides an appropriate height transition between the Sorrell Street HCA and broader Parramatta CBD
- Provides a certain degree of built form variation
- Opportunities to mitigate visual and environmental impact from broader Parramatta CBD
- Position supported by Urbis Heritage Study

Option 4 - FSR 4:1 plus DE, Height - 54m (17 storeys) and Height with DE – 62.1m (20 storeys)




- Minimal visual transition between the CBD and HCA.
- Significant towers directly adjacent to the low-scale HCA.
- Provides a limited degree of built form variation.

Option 5 - FSR 5:1 plus DE , Height - 67m (20 storeys) and Height with DE – 77.1m (23 storeys)



- No visual transition between the CBD and HCA
- Wind impacts of intense development on the edge of the city
- Potential for inconsistent development outcomes when compared to other transition areas around the CBD

Option 6 - FSR - 6:1 plus DE, Height - 80m (25 storeys) and Height with DE - 92m (29 storeys)



- Council's previously endorsed position was FSR 6:1
- No visual transition between the CBD and HCA
- Wind impacts of intense development on the edge of the city
- Potential for inconsistent development outcomes when compared to other transition areas around the CBD
- Maximises development potential near new Light Rail Stop
- Position supported by Hector Abrahams Architects (HAA) Heritage Study of Interface Areas

7. Preferred Built Form Strategy

This section of the Draft Planning Strategy will be completed following the exhibition period, once Council has considered all feedback received, undertaken an economic feasibility study and undertaken an assessment of each option using the weighted assessment criteria described in **Table 2** below. This will inform a final, preferred option for the North-East PIA when the Planning Strategy is adopted.

Assessment Criteria	Weighting
Context and Neighbourhood Character <ul style="list-style-type: none"> To what extent is the built form option respondent to its context and the character of the area? Whether the built form option enhances the qualities and identity of the surrounding areas, including areas undergoing change? 	20%
Built Form and Scale <ul style="list-style-type: none"> Whether the built form option achieves a scale, massing and height appropriate to the existing or desired future character of the street, surrounding buildings and landscape setting, including transition? The extent to which the built form option defines the public domain and provides a well-designed pedestrian experience at ground level? 	20%
Heritage Relationships <ul style="list-style-type: none"> To what extent does the built form option respect the heritage values of adjacent heritage items and the heritage conservation area? Whether the built form option enables reasonable levels of solar access to heritage items and the heritage conservation area? The degree to which the built form option respects and creates distant views? 	20%
Strategic Planning <ul style="list-style-type: none"> To what extent does the built form option contribute to the vision for the Parramatta CBD as described in the Parramatta CBD Planning Proposal? To what extent does the built form option achieve the relevant planning priorities, policy directions and actions of Council's Local Strategic Planning Statement? 	20%
Land Use and Transport Integration <ul style="list-style-type: none"> The extent to which the built form option supports the integration of land use and transport objectives for higher density around key public transport nodes? The extent to which the built form option integrates with and maximises the benefits of the new light rail stop? 	15%
Economic Feasibility <ul style="list-style-type: none"> The degree to which the built form option is likely to facilitate a feasible redevelopment of the site? 	5%
TOTAL	100%

Table 2 – Weighted assessment criteria for each of the built form options

8. Future work and next steps

The North-East Planning Investigation Area is currently at the early stages of the planning process. The next steps in relation to the process are as follows:

1. Complete public exhibition of the Draft Planning Strategy for the North-East Planning Investigation Area, seeking community feedback on the six built form options.
2. Undertake an economic feasibility study that considers the nature of existing development and the proposed built form options.
3. Review submissions, economic feasibility study and undertake an assessment of the built form options using the weighted assessment criteria provided in Section 7 of this Draft Planning Strategy – including undertaking any additional technical studies if required. Following this, update the Draft Planning Strategy accordingly, including identification of a single, recommended built form option.
4. Report to Council the outcomes of public exhibition process, economic feasibility study and assessment against the weighted assessment criteria, and seek a resolution to endorse a revised Planning Strategy (including a single, preferred built form option).

Once a final Planning Strategy has been adopted by Council, this will guide site-specific planning proposals within the PIA. Such site-specific planning proposals are likely to require their own supporting technical studies.

Appendix 1 – Re-development assumptions

Re-development assumptions that have informed the urban design modelling of the six built form options included in this Draft Planning Strategy are as follows:

- Past Urban Design testing and heritage studies (Urbis 2015, Hector Abrahams Architects 2017 and DPIE commissioned GML study 2018) have been reviewed in light of a more definitive *Parramatta CBD Planning Proposal* (including application of those principles).
- An achievable design feasibility (setbacks, floor plates, amalgamation) has been assumed for all development scenarios; however more detailed feasibility studies may be required.
- The same assumed amalgamation pattern has been applied across all development scenarios adopting a minimum lot frontage of 35m and site area of at least 1,000 sqm (applying the FSR sliding scale where necessary).
- Lower spectrum FSR scenarios may allow for lesser separation distances between the subject sites and the HCA, supporting courtyard typologies.
- Higher spectrum FSR scenarios will require greater separation distances and therefore result in a 'tower without podium' typology.
- The Design Excellence bonus has been applied to all development scenarios with an FSR of 3:1 or greater (40m+ height), consistent with the *Parramatta CBD Planning Proposal*.

The diagram over the page provided the basis for the modelling of the built forms consistent with the above-described assumptions.



Appendix 2 – Comparison of the built form options

The images below compare the six built form options from different viewpoints.

OPTION 1 - FSR 0.8:1 - Aerial view over Victoria Road looking north west



OPTION 2 - FSR 2:1 Aerial view over Victoria Road looking north west



OPTION 3 - FSR 3:1 Aerial view over Victoria Road looking north west



OPTION 4 - FSR 4:1 - Aerial view over Victoria Road looking north west



OPTION 5 - FSR 5:1 Aerial view over Victoria Road looking north west



OPTION 6 - FSR 6:1 Aerial view over Victoria Road looking north west



Views looking west from the corner of Brickfield & Grose Street
Option 1: 0.8:1

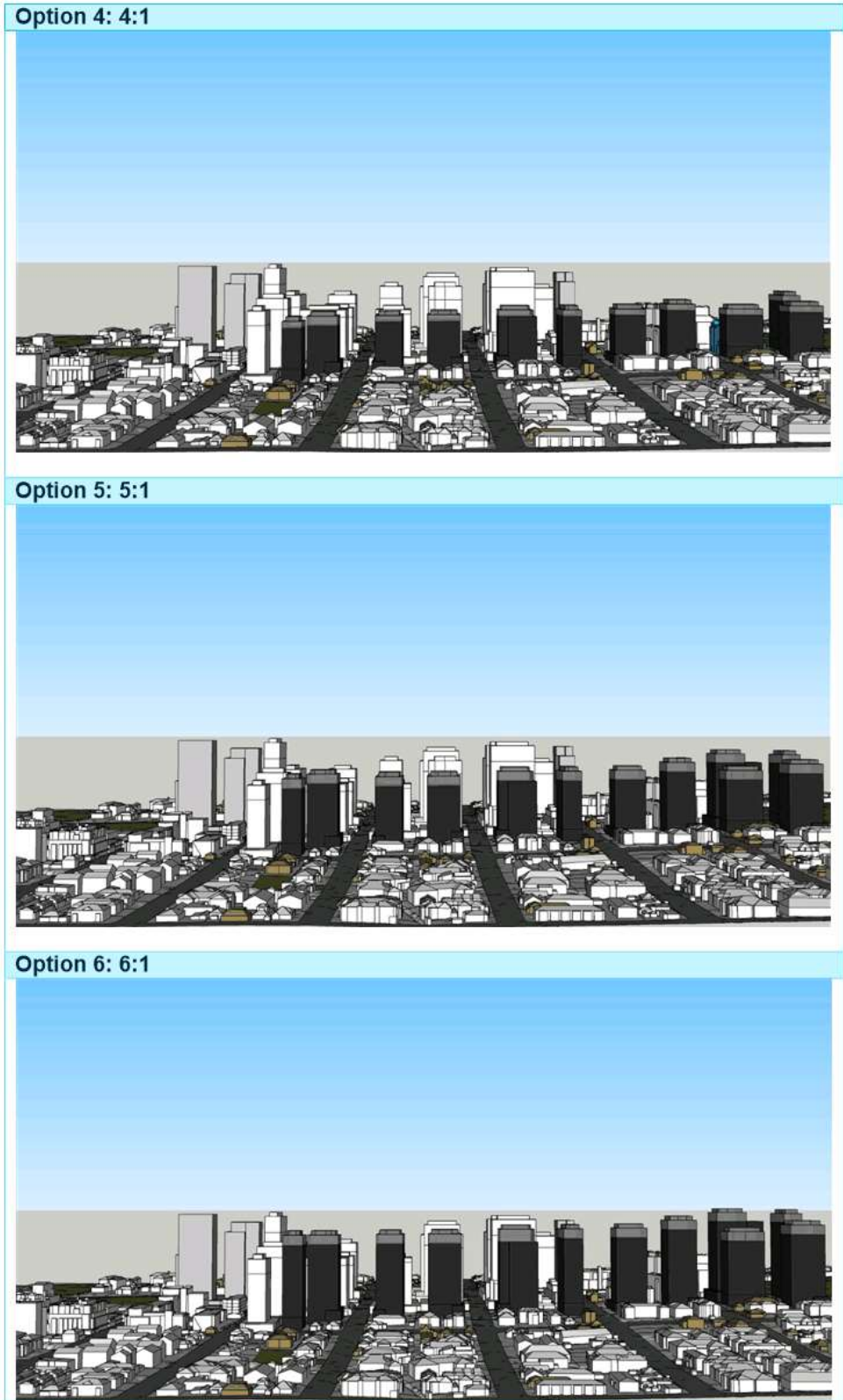


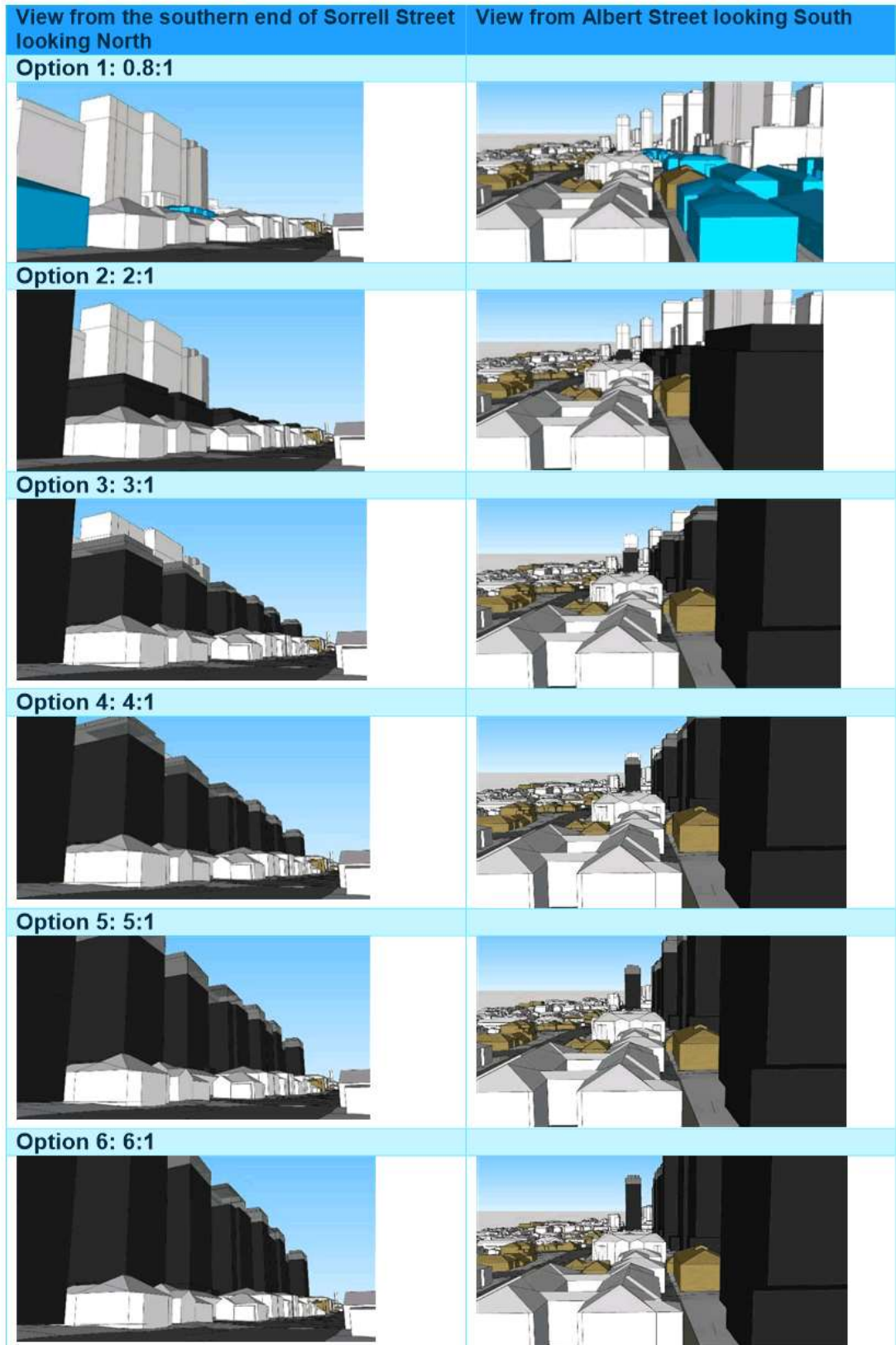
Option 2: 2:1



Option 3: 3:1







View from corner of Isabella & Sorrell Street looking South West
Option 1: 0.8:1



Option 2: 2:1



Option 3: 3:1



Option 4: 4:1



Option 5: 5:1



Option 6: 6:1



