

ADDENDUM TO PARRAMATTA SEPP (HOUSING) COMPLIANCE REPORT



October 2024

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Mott MacDonald Australia Pty Ltd

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Glossary

Term	Definition
ADG	Apartment Design Guide
Concept SSD Application	A concept development application as defined in Section 4.22 the <i>EP&A Act</i> , as a development application that sets out concept proposals for the development of a site, and for which detailed proposals for the site or for separate parts of the site are to be the subject of a subsequent development application or applications.
CoPC	City of Parramatta Council
CSSI approval	Critical State Significant Infrastructure Approval
Stage 1 CSSI Approval	SSI-10038 approved 11 March 2021 all major civil construction works between Westmead and The Bays, including station excavation and tunnelling, associated with the Sydney Metro West railway line
DPHI	NSW Department of Planning, Housing and Infrastructure
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i>
EPA	NSW Environment Protection Authority
ESD	Ecologically Sustainable Design
GANSW	NSW Government Architect's Office
GFA	Gross Floor Area
OSD	Over Station Development
PDCP	Parramatta Development Control Plan 2023
PLEP	Parramatta Local Environment Plan 2023
SEARs	Secretary's Environmental Assessment Requirements
SEPP (Housing)	State Environmental Planning Policy Housing 2021
SRD SEPP	State Environmental Planning Policy (State and Regional Development) 2011
SSDA	State Significant Development Application
Sydney Metro West	Construction and operation of a metro rail line and associated stations between Westmead and the Sydney CBD
TfNSW	Transport for New South Wales

1.0

Introduction

1.0 Introduction

1.1 Purpose and Scope

This addendum to the SEPP Housing Compliance Report supports a Concept State Significant Development Application (Concept SSDA) submitted to the Department of Planning and Environment, now Department of Planning and Environment (DPHI) pursuant to part 4 of the Environmental Planning and Assessment Act 1979 (EP&A Act).

Sydney Metro is seeking to secure approval within the meaning of section 4.22 of the EP&A Act, for an over station development (OSD) and adjacent station development (ASD). The Concept SSDA is seeking consent for maximum building envelopes, proposed land uses, maximum building heights, maximum Gross Floor Area (GFA) and car parking. The proposed development comprises four buildings (Buildings A, B, C and D), consisting of three new commercial office buildings (Buildings A, C and D) and one residential accommodation building (Building B).

The Concept SSDA was lodged with the DPHI on 10 November 2022 and was placed on public exhibition for 28 days between 16 November 2022 and 13 December 2022. In total, advice was received from 11 State and local government agencies and 15 were received from key stakeholders, community organisations.

DPHI issued a letter to Sydney Metro on the 16th December 2022 requesting a response to the issues raised during the public exhibition of the application. DPHI also issued a further Request for Further Information (RFI) on the 6th February 2023 and the Submissions Report provides a response to these matters.

Advice from NSW government agencies has been received in response to the Concept SSDA EIS. This addendum report addresses built form related issues raised in agency submissions from the DPHI and City of Parramatta (CoPC).

This report responds to comments raised in submissions received during the public exhibition of the Concept SSDA submitted to DPHI.

This addendum report is broken down into the following chapters:

- Chapter 1 – provides an introduction to report including an overview of agency advice received and responses to the issues raised
- Chapter 2 – outlines the design refinements made to Building B and the residential amenity implications.
- Chapter 3 – provides an assessment of the redevelopment opportunities for the adjacent site.

This report should be read in conjunction with the Parramatta Over and Adjacent Station Development SEPP Compliance Report and the Addendum to the Built Form and Urban Design Report.

1.2 DPHI Agency Advice

DPHI issued a letter to Sydney Metro on 16 December 2022 requesting a response to the issues raised during the public exhibition of the application. DPHI also issued a further Request for Further Information (RFI) on 6 February 2023, seeking additional information regarding aspects of the submission.

1.3 CoPC Agency Advice

CoPC issued agency advice as part of the public consultation for the Parramatta Station Development SSD application. For detailed responses please refer to the Addendum to the Built Form and Urban Design Report.

1.4 Design Refinements

In response to agency advice several refinements have been incorporated into the building envelopes and indicative reference scheme during design development. The key changes are summarised below:

- Building B envelope has been adjusted to increase the southern side setback to an average 6m in line with the Apartment Design Guide objectives.
- Additional retail and commercial floorspace has been located within Building B to meet the minimum 1:1 commercial floorspace requirement of mixed-use land zoning developments.
- The alignment of Horwood Place has been refined in response to CoPC request, straightening the carriageway and providing additional space around Kia Ora.

1.5 Scope of Assessment

As the result of these additional design refinements and the request for information made by DPPI, the report has been amended. The scope of this addendum to the SEPP Housing Compliance Report is as follows:

- Changes to Building B to meet the minimum 1:1 commercial FSR requirements of mixed use land zoning.
- Revisions to the Building B Envelope along the southern elevation.
- Demonstration that good residential amenity can be achieved in accordance with the Apartment Design Guide.
- Assess the potential impacts of the proposal to adjoining sites at 198-216 Church St and 38-46 Macquarie St including its redevelopment potential.

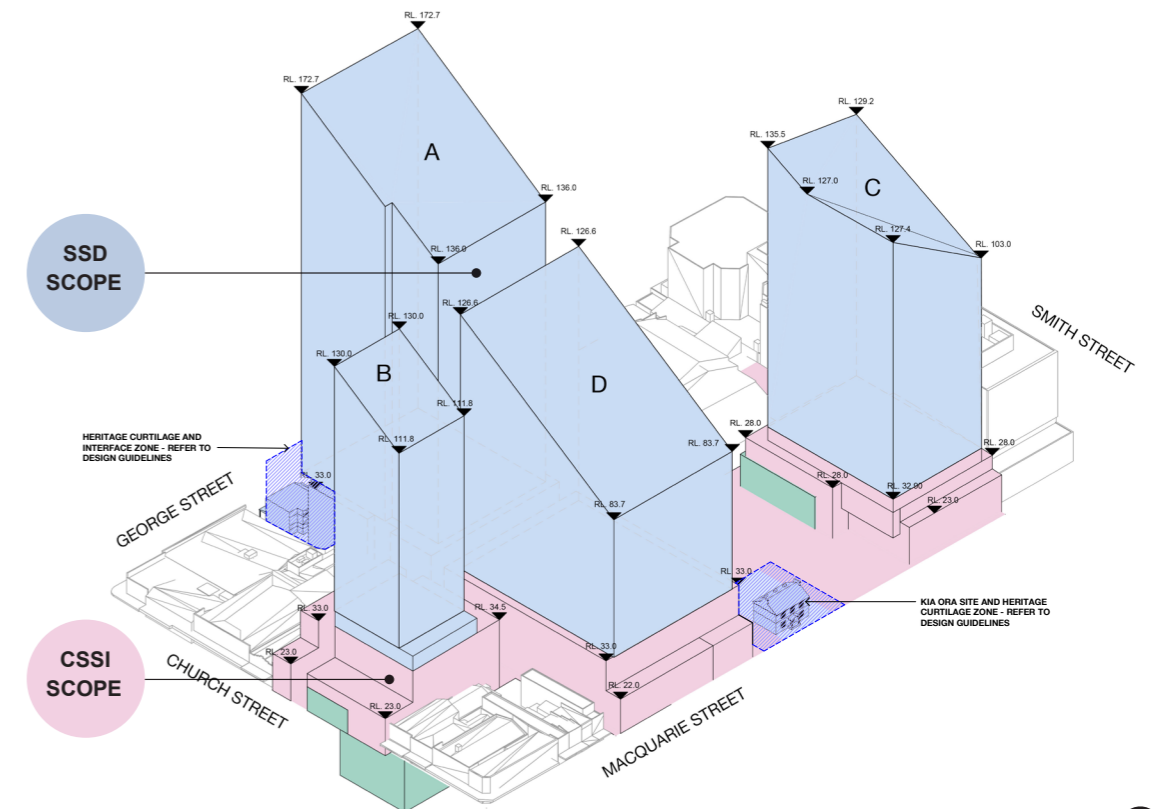
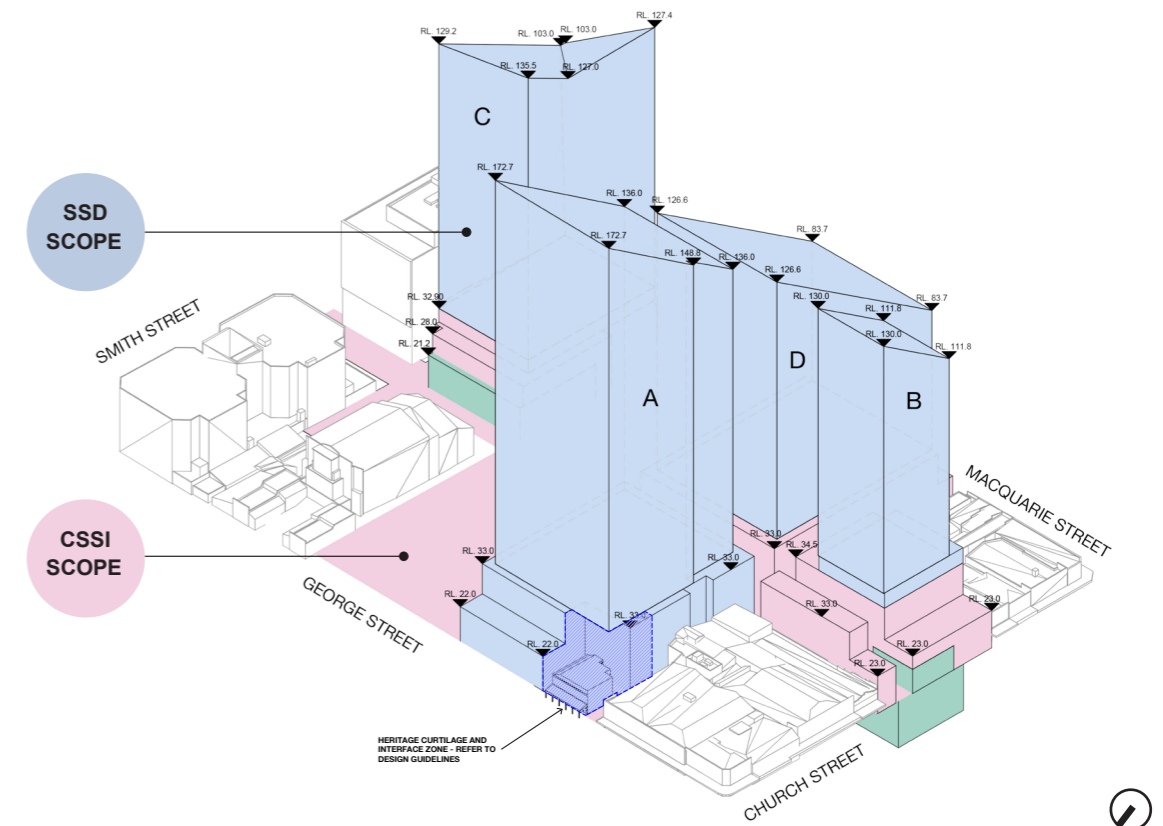


Figure 1-1 Refined Building Envelopes

Legend

Parramatta Station CSSI Areas
 Metro Entrances, Bikeparking and Station Areas
 Concept SSD Areas



2.0

Building B

2.0 Building B

2.1 FSR VARIATION

Building B is located within a B4 Mixed Use Zone under the PLEP 2011, which was in force when the Concept SSDA was lodged. It is a requirement of this land zoning that there is a minimum of 1:1 FSR of commercial GFA within the development.

The Concept SSDA sought approval for 1,114m² of commercial / retail GFA within Building B which is less than the 2470m² required to achieve the minimum. A clause 4.6 variation was lodged seeking a variation to this quantity. CoPC have advised that they cannot legally support this variation as this contravenes Clause 4.6(8)(ca) of PLEP, which caps any floor space variation at 5%.

During design development two additional floors of commercial space have been added into the base of the tower at levels 5-6. Additional retail has been added to the northern laneway building at level 02.

The indicative reference scheme now includes a total of 2616m² of non-residential GFA (1494m² commercial GFA and 1122m² of retail GFA). The inclusion of the commercial floors has reduced the total number of apartments down from 145 to 111. It is envisaged that this commercial space could be operated as either:

- A wellness centre offering to both residents of the building and members of the public via membership.
- Medical suites / strata offices / local professional services in which case an additional lift and separated entrance may be incorporated (not currently shown indicative reference scheme and subject to future design development.)

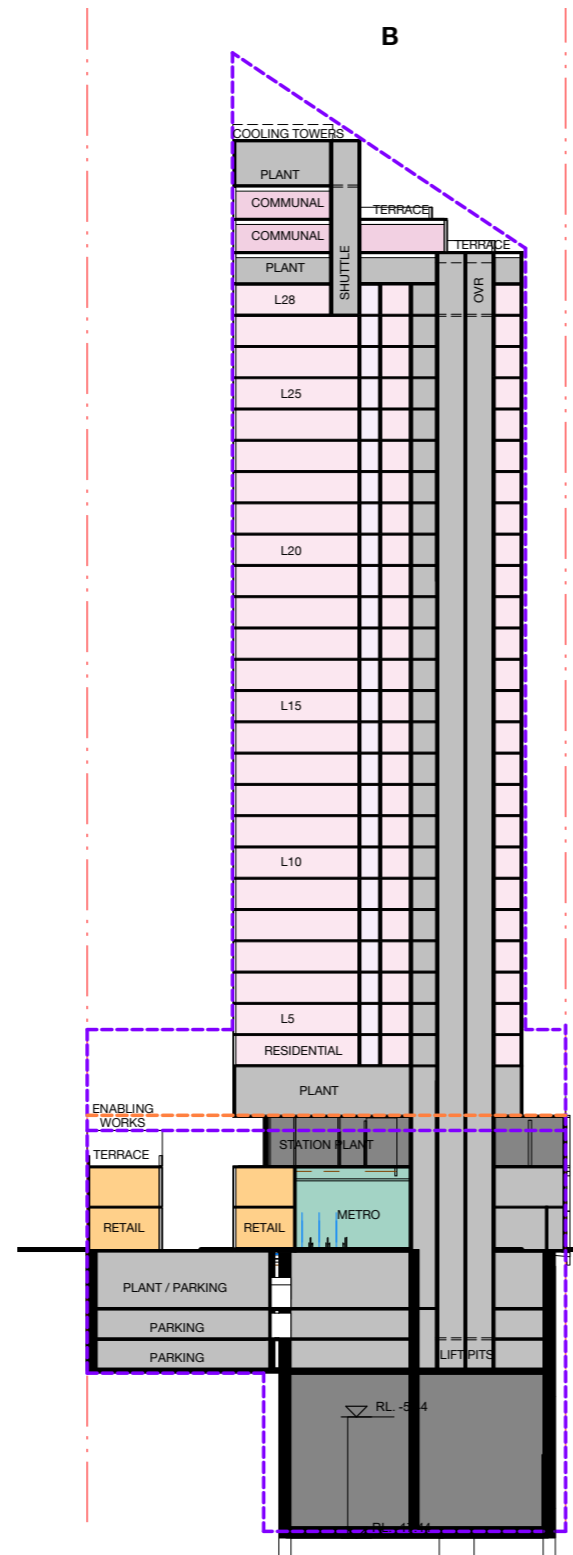


Figure 2-1 Building B Section, exhibited as part of the Concept SSDA 1:750

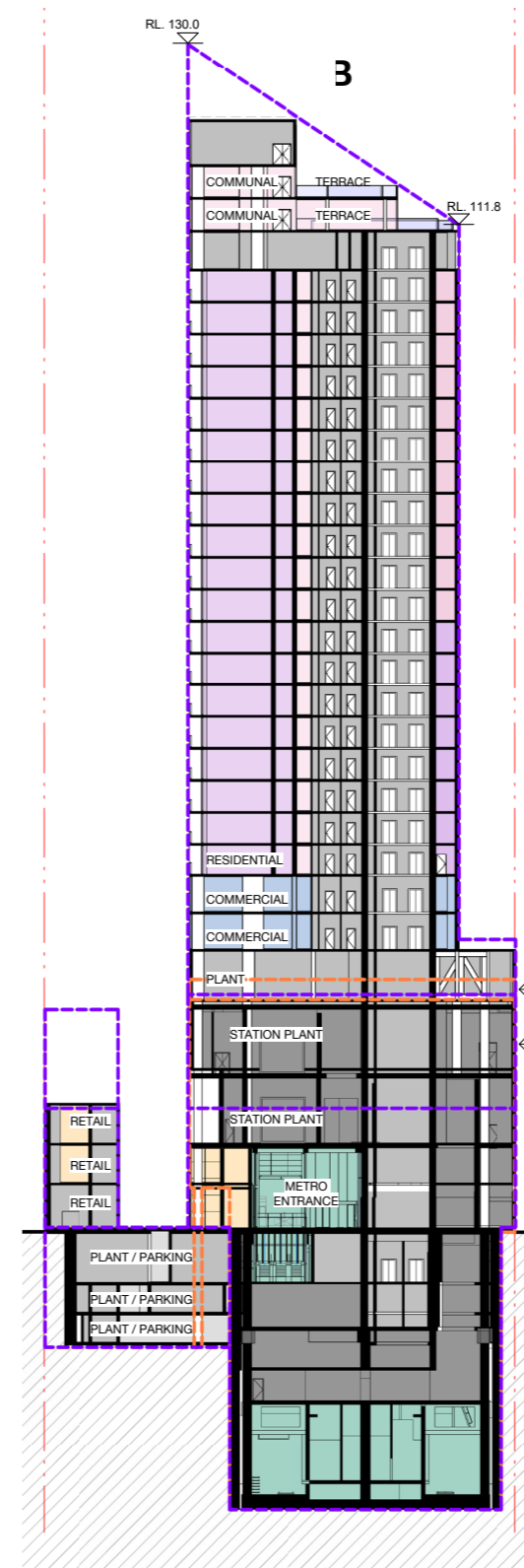


Figure 2-2 Building B Section, refined 1:750

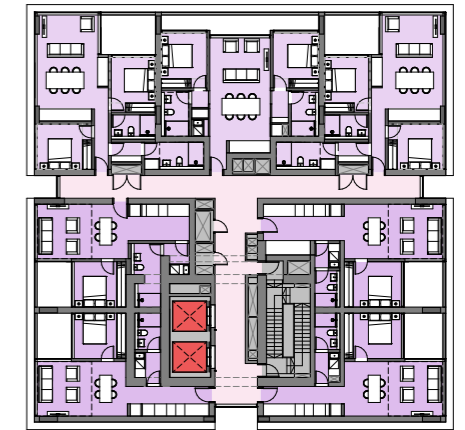


Figure 2-3 Building B refined Low rise Floorplate, 1:500

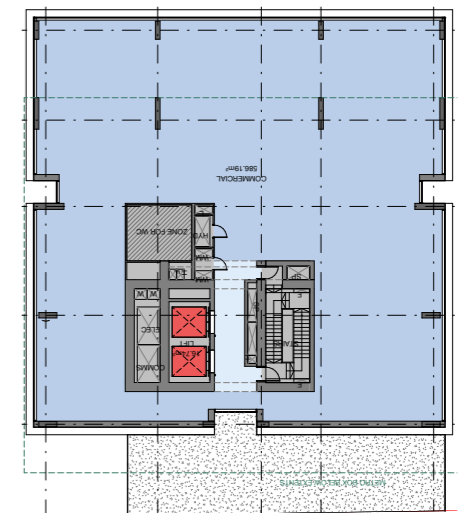
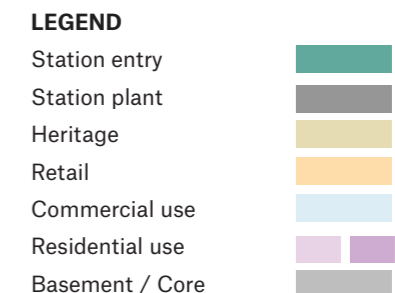
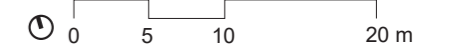


Figure 2-4 Building B refined Commercial Floorplate, 1:500



2.2 Building Envelope

The concept SSDA envelopes for Building B are compliant or in excess of the minimum setbacks and building separations defined in ADG Objective 3F-1 (Figure 2-15 on the northern, eastern and western frontages).

The concept SSDA adopted a 4.5m setback to the southern boundary on the basis that the southern building facade contains no windows. There is significant precedent of blank walls being constructed on boundary lines in dense urban environments.

In light of agency advice received during the submissions process, the southern setback has been increased from 4.5m to 6m. As can be seen from the design criteria in the ADG extract below, 6m is a complying side boundary setback dimension for a building 9+ storeys in height, provided there are no windows to habitable rooms on this frontage.

Objective 3F-1
Adequate building separation distances are shared equitably between neighbouring sites, to achieve reasonable levels of external and internal visual privacy

Design criteria

- Separation between windows and balconies is provided to ensure visual privacy is achieved. Minimum required separation distances from buildings to the side and rear boundaries are as follows:

Building height	Habitable rooms and balconies	Non-habitable rooms
up to 12m (4 storeys)	6m	3m
up to 25m (5-8 storeys)	9m	4.5m
over 25m (9+ storeys)	12m	6m

Figure 2-5 Apartment Design Guide - Objective 3F-1

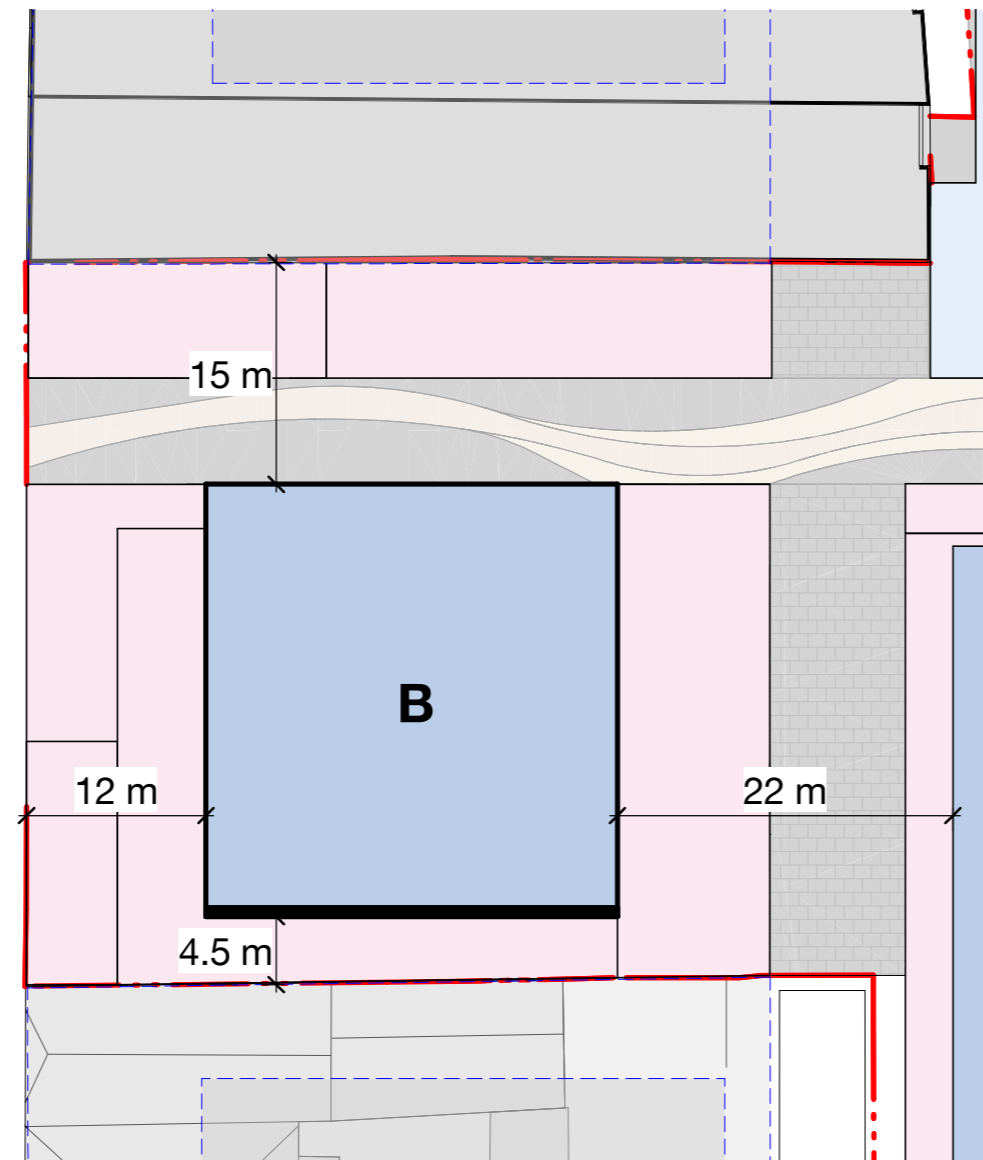


Figure 2-6 Building B Envelope, exhibited as part of the Concept SSDA 1:500

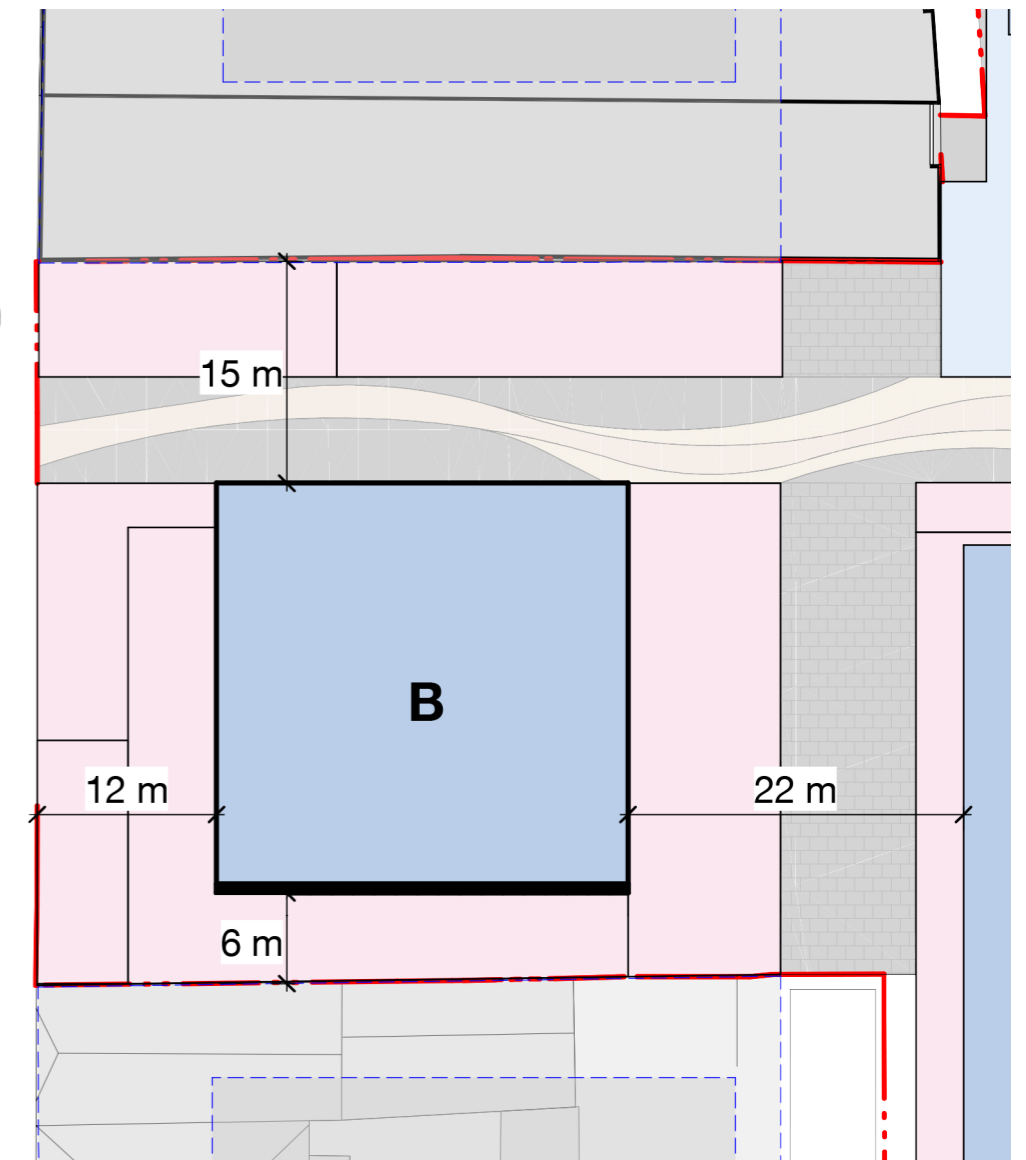


Figure 2-7 Building B Envelope, refined 1:500

LEGEND

- Tower Envelope
- Podium Envelope
- Non-habitable facade

2.3 Residential Amenity

The Building B residential floor plate has been carefully designed to:

- Maximise solar access
- Optimise views and outlook
- Maximise cross ventilation
- Provide natural light and cross ventilation to circulation spaces.
- Eliminate south facing apartments with (no solar access or outlook once site 03 redevelops - ADG max 10%).

The typical low rise tower plans for both the concept SSDA and the refined indicative reference schemes have been provided. The two southernmost apartments on the floorplate have been designed to maximise residential amenity.

Living rooms, bedrooms and balconies have been oriented to the east and west in order to achieve solar access and provide views and outlook.

There are no windows into apartments along the southern facade. The indicative reference design adopts a glazed window to lift lobby space for purposes of bringing natural light and ventilation into corridor spaces. These circulation spaces are not deemed to be habitable spaces. Future development could omit this window or provide, opaque glass or screening to the space.



Figure 2-8 Building B Low rise Floorplate, exhibited as part of the Concept SSDA 1:200

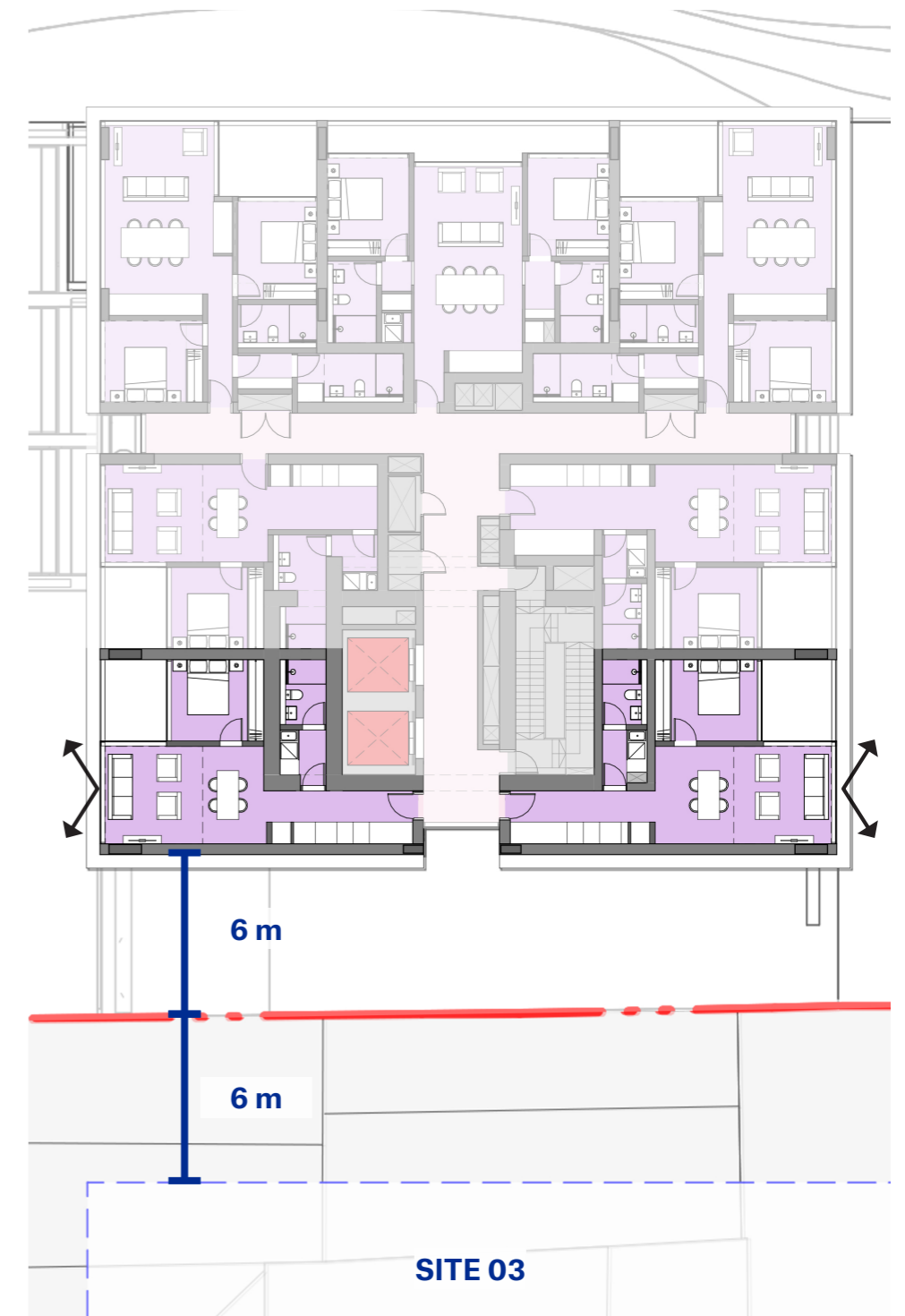


Figure 2-9 Building B Low rise Floorplate, refined 1:200

1:200 0 2 4 8 m

2.3 Residential Amenity

Throughout the development of the indicative reference design the following issues were considered:

- Direct solar access to living areas and private open spaces promoting good amenity to as many apartments as possible. (Figure 2-10).
- Views natural light and ventilation to communal and circulation spaces (Figure 2-14).
- Many apartments have views of the Parramatta river, parklands, and Blue Mountains (Figure 2-11).
- Generous private open space in exceedance of SEPP guidelines.
- Privacy between apartments has been considered, with privacy blades used to minimise visual intrusion between balconies.
- Generous public open space as part of the wider masterplan.
- All apartments have adequate storage including space for bike parking.
- 80% of apartments are naturally ventilated (Figure 2-13).
- All apartments meet or exceed the minimum internal and private open space area requirements for SEPP.
- Communal areas have been positioned at the top of the tower in areas with the best amenity. They receive excellent views, great sun throughout the year, offer indoor/outdoor experiences and include landscape terrace areas. (Figure 2-12).
- All apartment layouts have been rationalised and optimised.

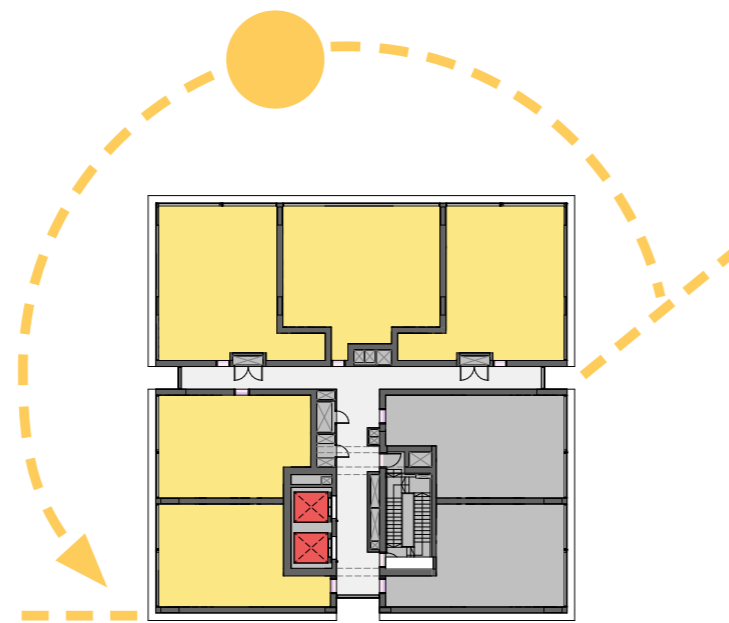


Figure 2-10 Solar Access

5 out of 7 apartments, or 71% of apartments, on a typical floorplate achieve 2 hours solar access to living rooms and private open spaces on 21st June.

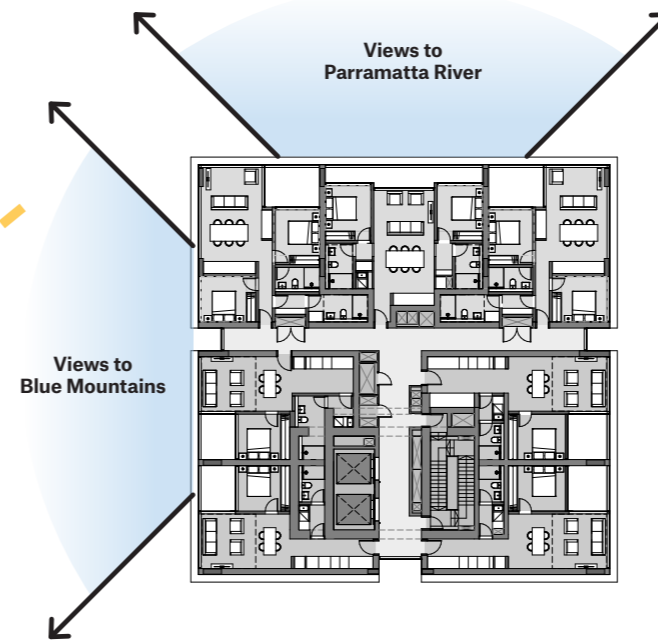


Figure 2-11 Apartment views

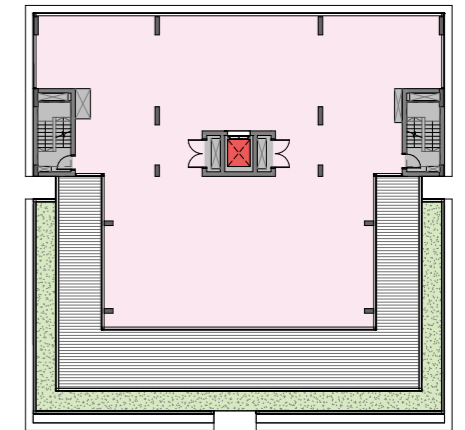


Figure 2-12 Building B L27 Communal Floorplate, amended indicative reference scheme 1:500

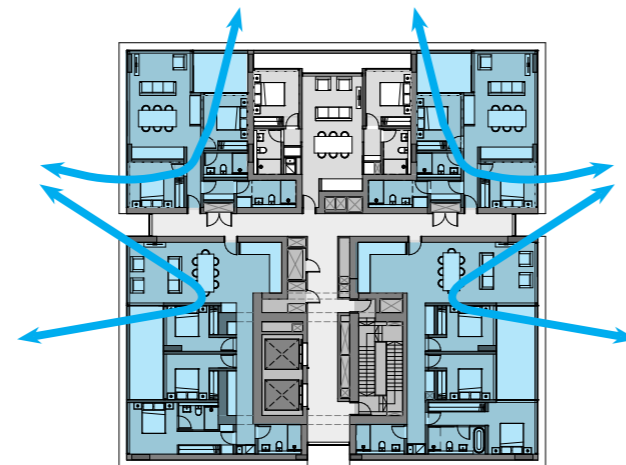


Figure 2-13 Cross flow Ventilation

4 out of 5 apartments, or 80%, have the potential to achieve cross flow ventilation, in excess of the 60% ADG requirement applying to the lowest 9 floors only.

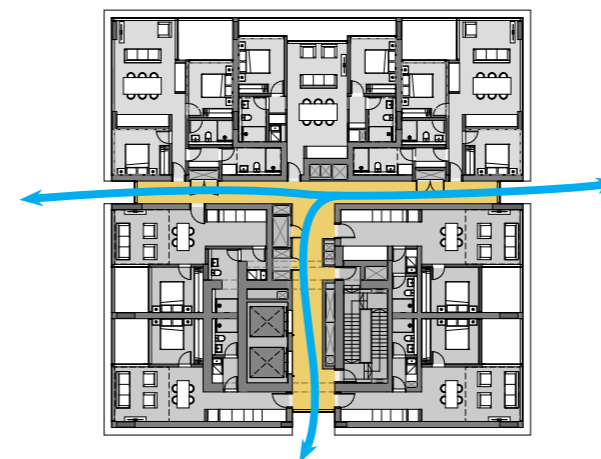


Figure 2-14 Corridor Cross flow Ventilation and Solar Access



Figure 2-15 Aria Brisbane, Bates Smart



Figure 2-16 QVM Munro, Bates Smart

3.0

**Site 03 - Adjoining
Development**

3.0 Site 03 - Adjoining Development

3.1 Site 03

Agency advice from DPHI requires further assessment of the impacts that the proposed envelopes may have to the adjoining site at 198-216 Church Street and 38-46 Macquarie Street, including their redevelopment potential.

These sites are located on the southwest corner of Church St and Macquarie St and are currently under fragmented ownership. Site 03 is the CoPC preferred land consolidation for these sites as defined under the PDCP 2023 and Civic Link design brief.

The total site area is 2066m². The site has a 38.6m western frontage to Church St, a 47m southern frontage to Macquarie St, a 42.5m eastern frontage to United Lane and a 49.2 shared northern boundary with Metro Building B.

The site includes the Horse Parapet Facade which has local heritage status.

Existing vehicle access is from United Lane via Macquarie St. Church St is closed to vehicles, providing pedestrian and light rail access only.

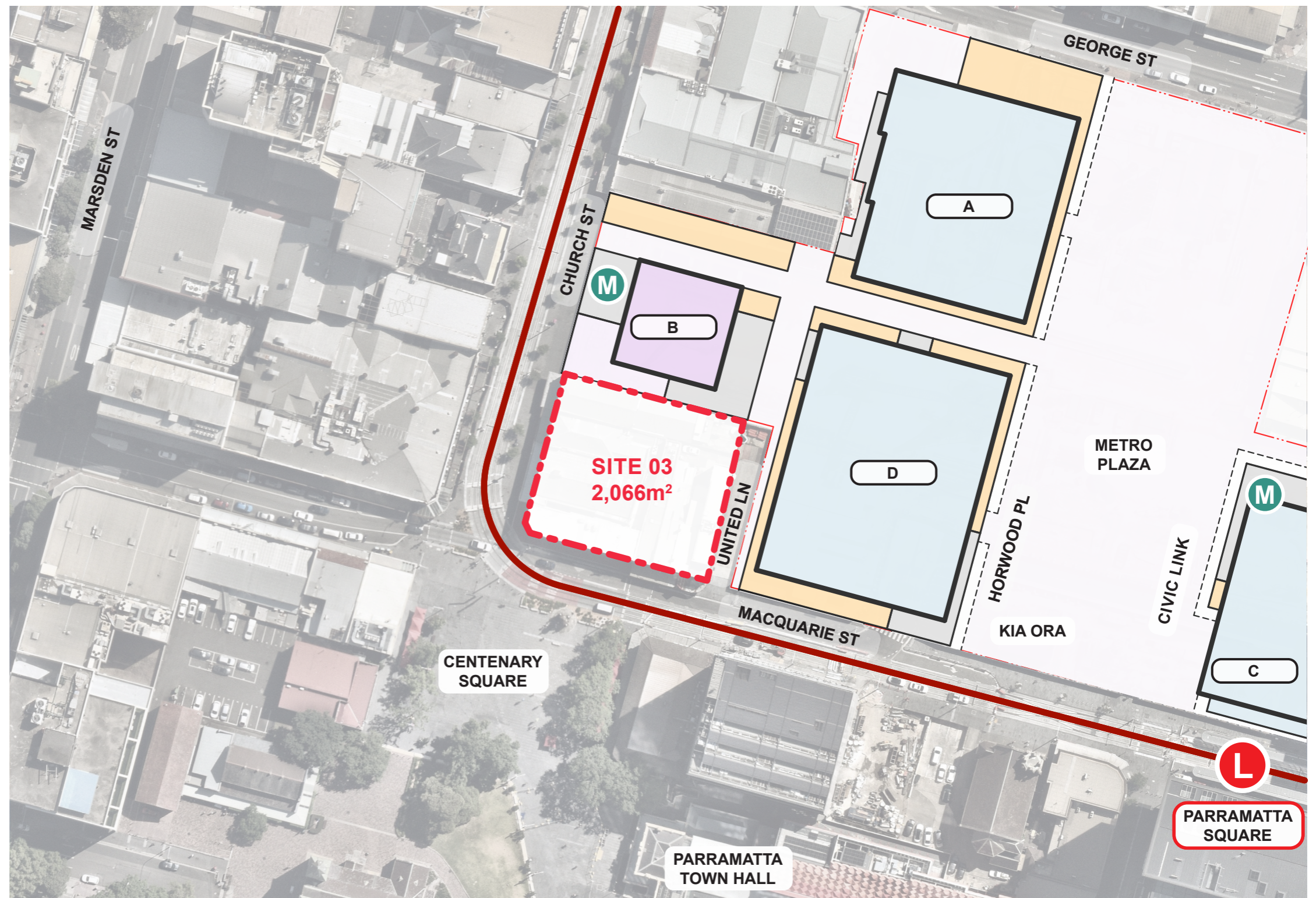


Figure 3-1 Site 03 Aerial

- Legend**
- Site 03 boundary
 - Plant / Station Plant
 - Heritage
 - Retail
 - Commercial use
 - Residential use
 - Metro entry M
 - Light rail L

3.2 Planning Controls

We have considered several redevelopment scenarios for this consolidated site within the planning controls outlined below.

Land Zoning

The adjoining site at 198-216 Church Street and 38-46 Macquarie Street is located within the MU1 - Mixed Use Zone. This site is subject to Clause 7.26 of the PLEP 2023 and falls within 'Area 1'. The requirement for Area 1 is a minimum 1:1 commercial FSR.

Floor Space Ratio

The site has a base floor space ratio of 10:1. Equates to a maximum permissible GFA of 20,660m².

Height of Buildings

The site is split into two height limits. 12m along the Church St frontage with the remainder of the site governed by the Sun Access Protection plane for Parramatta Square. This will result in a significantly lower potential tower height than the adjacent Building B.

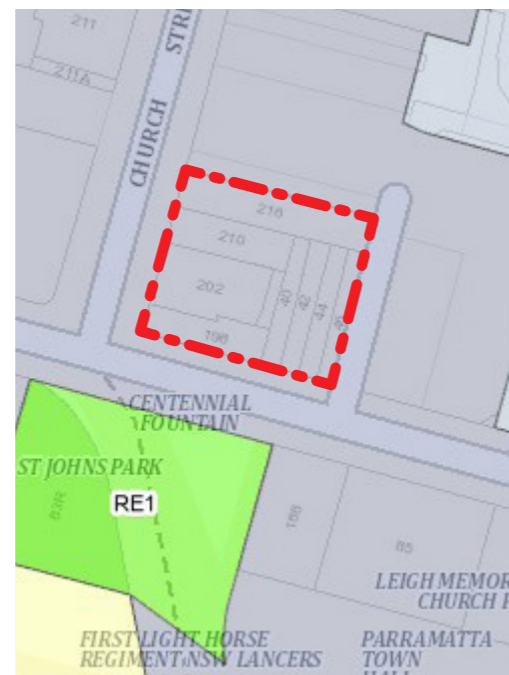


Figure 3-2 Land Zoning

Land Zoning
Parramatta LEP 2023

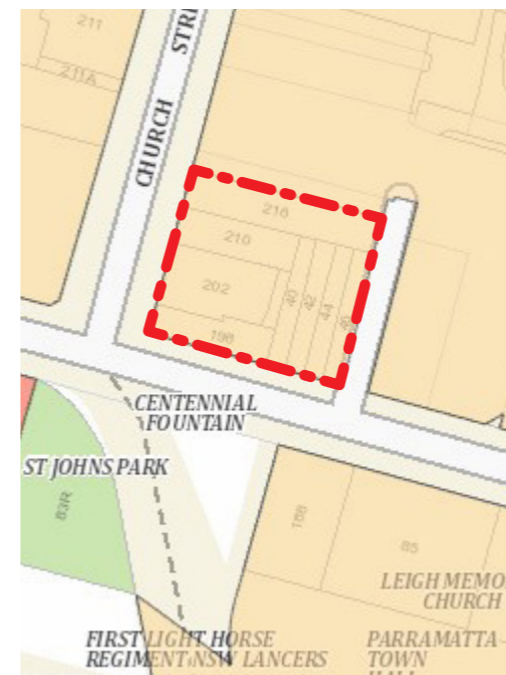
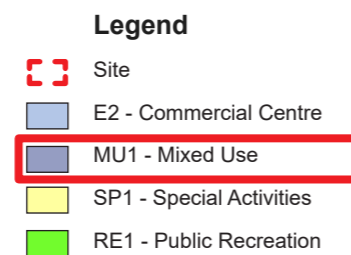


Figure 3-3 Floor Space Ratio

Floor Space Ratio
Parramatta LEP 2023



Figure 3-4 Height of Buildings

Height of Buildings
Parramatta LEP 2023

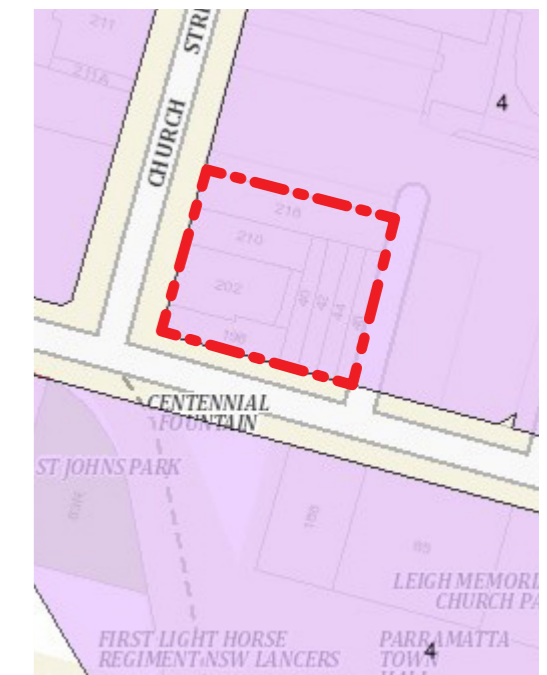


Figure 3-5 Sun Access Protection

Sun Access Protection
Parramatta LEP 2023



3.3 Study 01 - Commercial

Tower Setbacks

Church St:	12m (align to Dev B)
Macquarie St:	6m (align to Dev D)
United Lane:	3m
Northern Boundary:	6m

Building Separations

12m to Residential Development B (blank southern facade to blank northern facade.)
 15m to Commercial Development D.

Height of Building

Ground floor plus 20 storeys.
 Approx. 83m above ground.
 Core is positioned on the north to

Development Areas

Site Area:	2066m ²
Target FSR:	10 : 1
Permissible GFA:	20,660m ²
Total GBA:	24,644m ²
Total GFA:	19,934m ²
Total GFA/GBA efficiency:	81%
FSR:	9.65 : 1

This study demonstrates that a complying commercial building with excellent outlook, floorplate configuration and amenity through daylight can be achieved on the site.

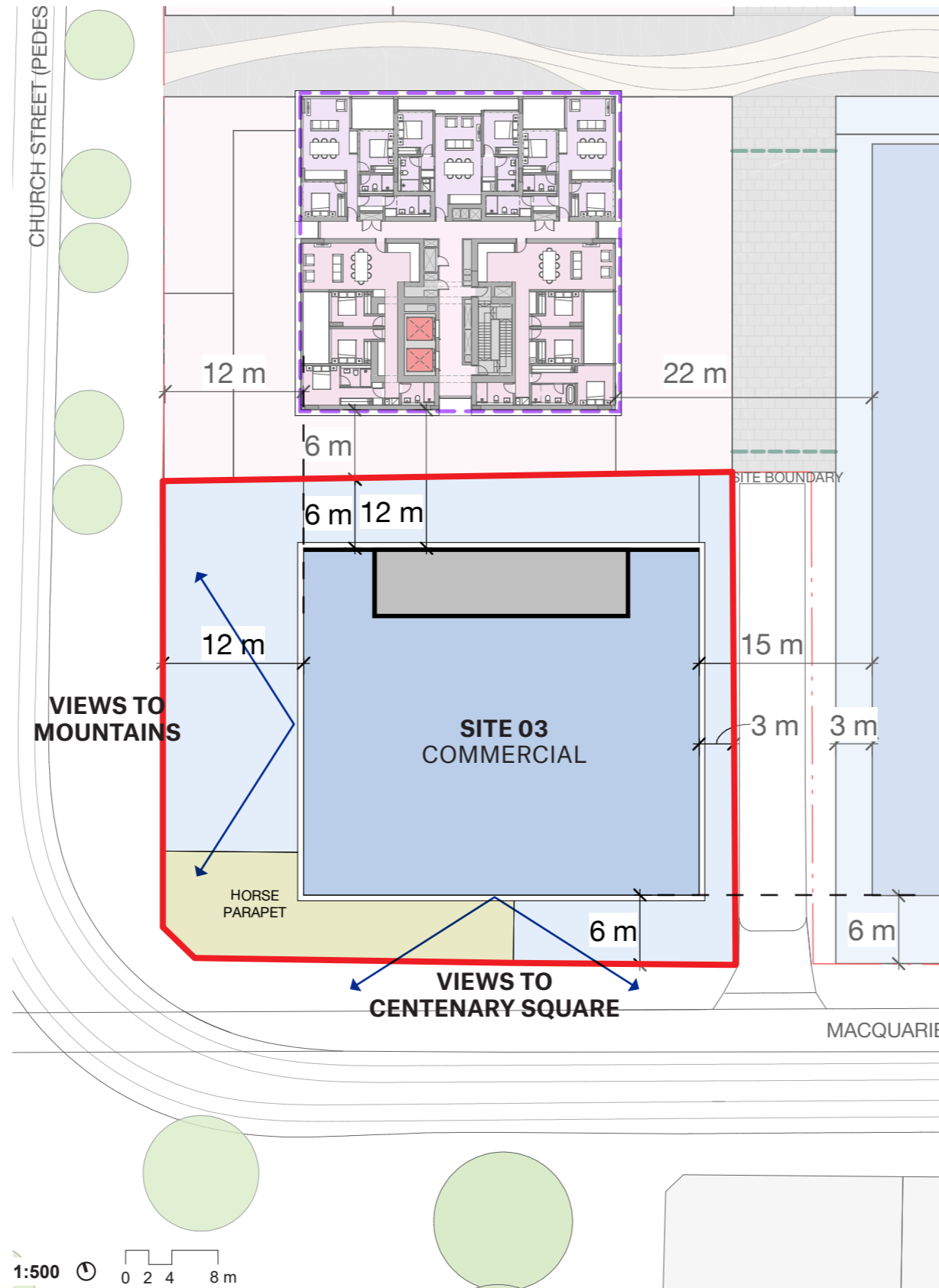


Figure 3-6 Site 03 Commercial Office plan

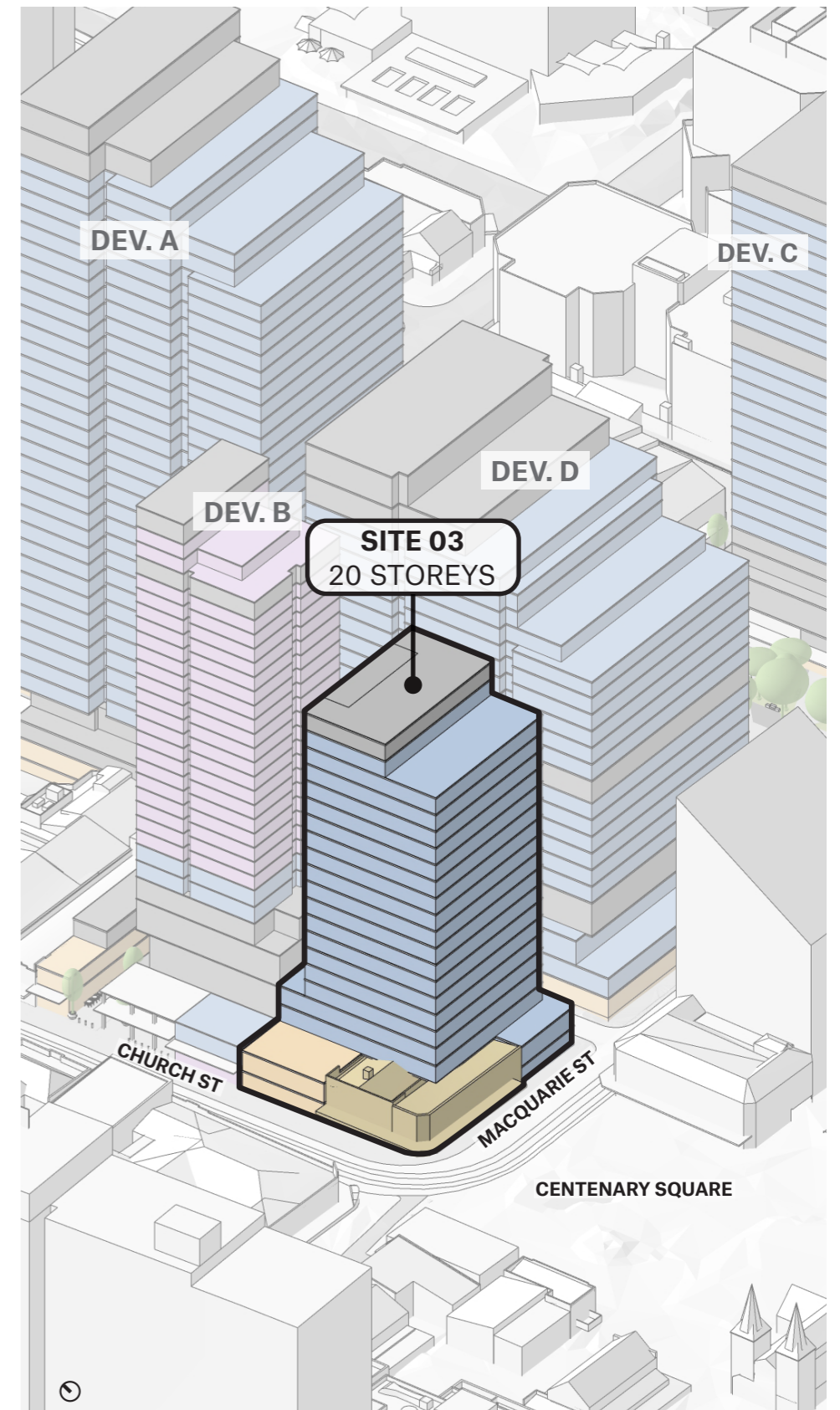


Figure 3-7 Site 03 Commercial Office Isometric

3.3 Study 01 - Commercial

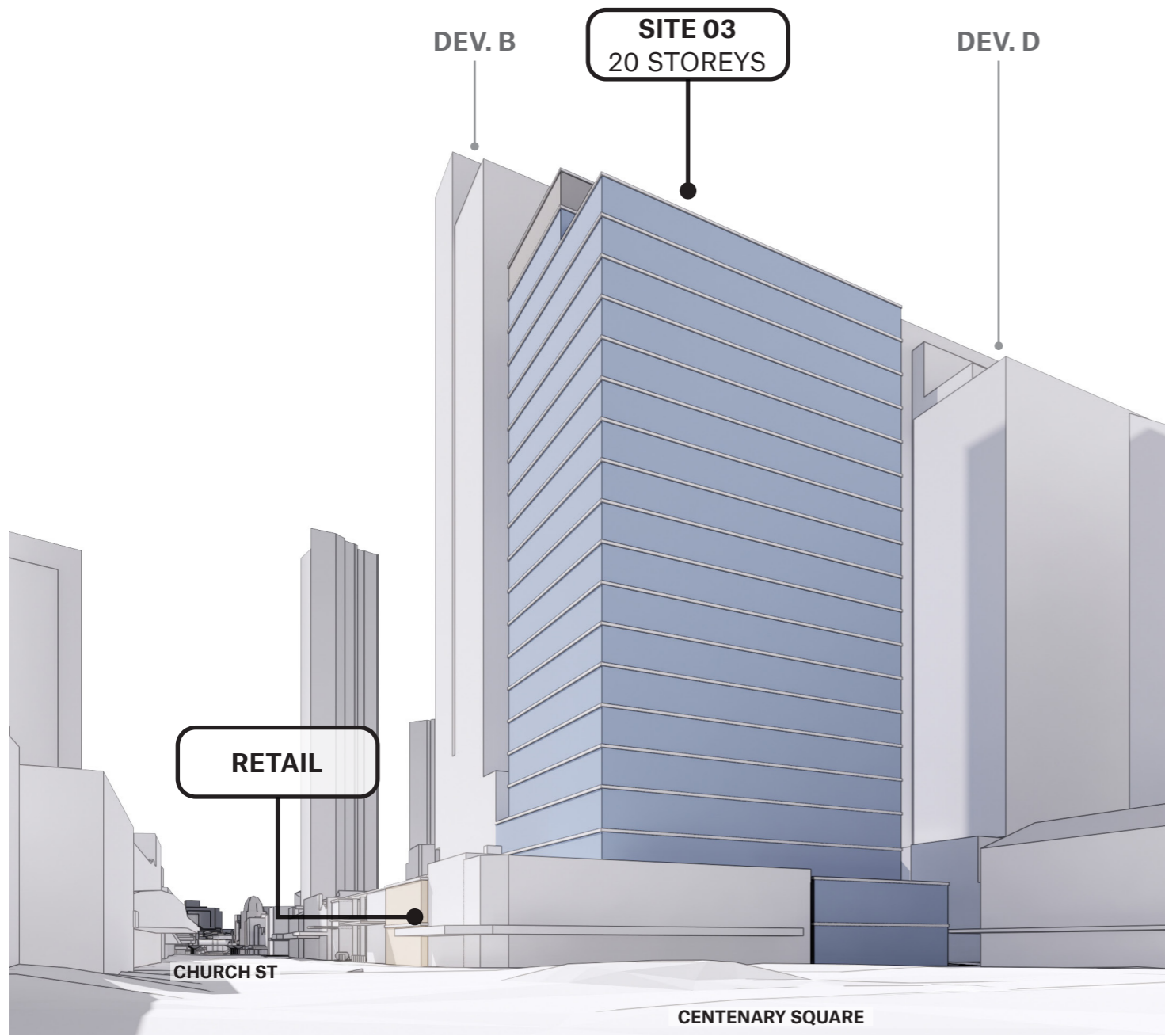
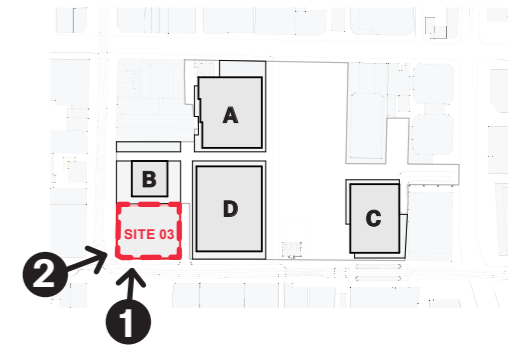


Figure 3-8 1. View of Commercial Office from Centenary Square

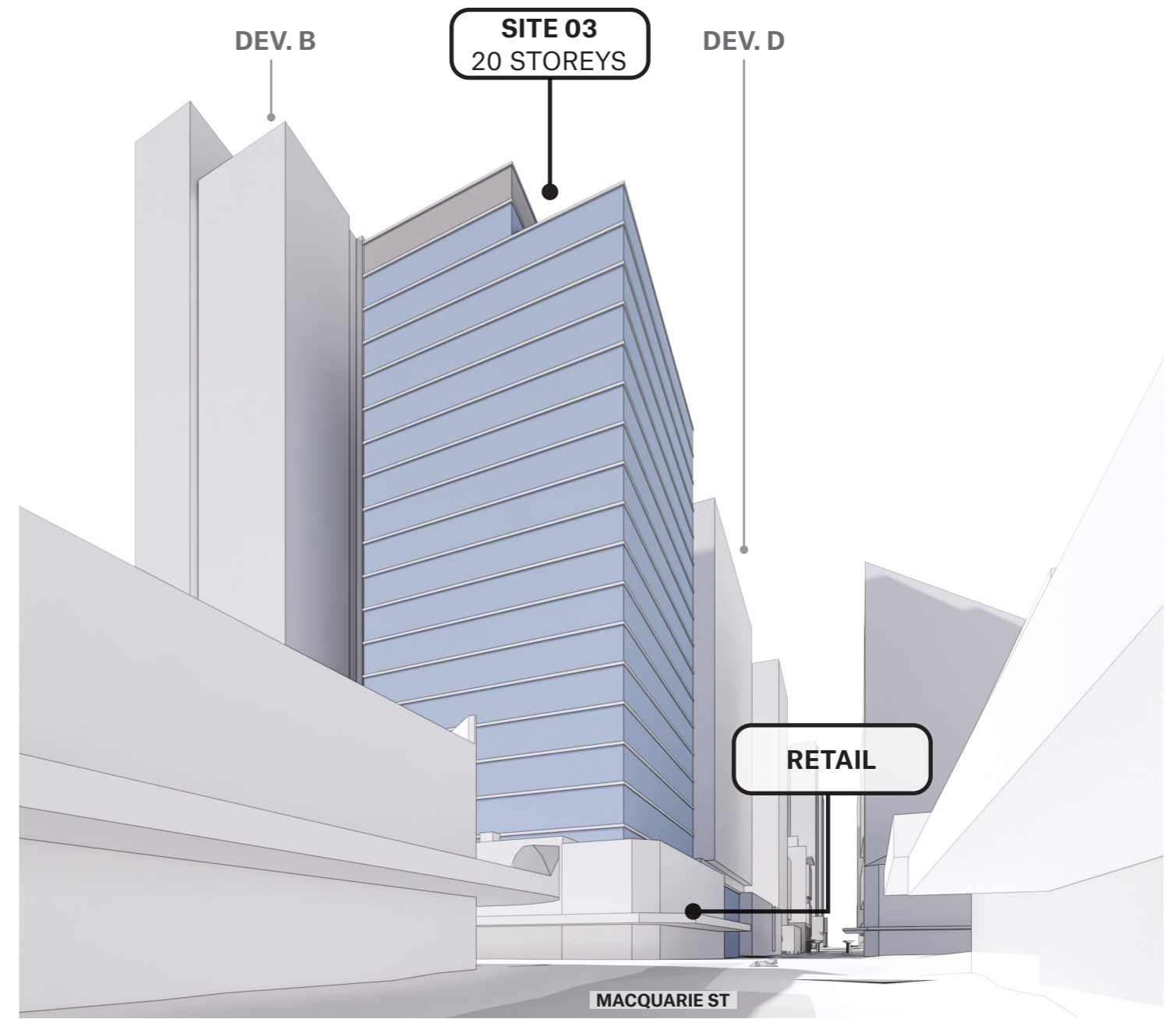


Figure 3-9 2. View of Commercial Office from Macquarie St

3.4 Study 02 - Hotel

Tower Setbacks

Church St:	12m (align to Dev B)
Macquarie St:	6m (align to Dev D)
United Lane:	3m
Northern Boundary:	6m

Building Separations

12m to Residential Development B (blank southern facade to blank northern facade.)
 15m to Commercial Development D.

Height of Building

Ground floor plus 23 storeys.
 Approx. 84.5m above ground.

Development Areas

Site Area:	2066m ²
Target FSR:	10 : 1
Permissible GFA:	20,660m ²
Total GBA:	27,637m ²
Total GFA:	22,830m ²
Total GFA/GBA efficiency:	83%
Total FSR:	11.05 : 1
Commercial/Retail FSR	1 : 1
Approx. Total Keys:	340

This study demonstrates that a complying hotel with excellent number of key, access to views, floorplate configuration and amenity can be achieved on the site. A podium with retail at Ground and Level 01 can achieve the minimum commercial FSR requirements of the site.

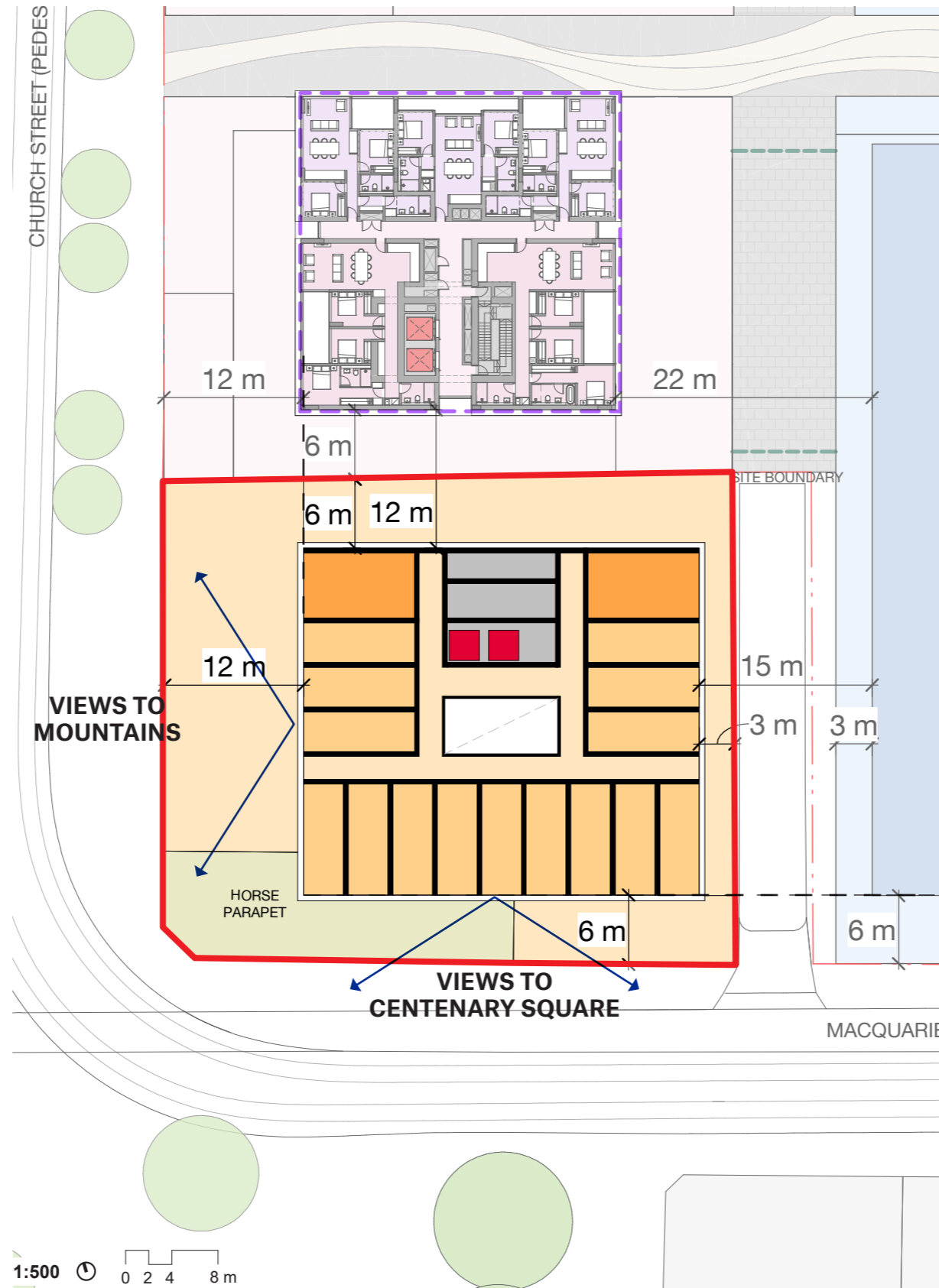


Figure 3-10 Site 03 Hotel plan

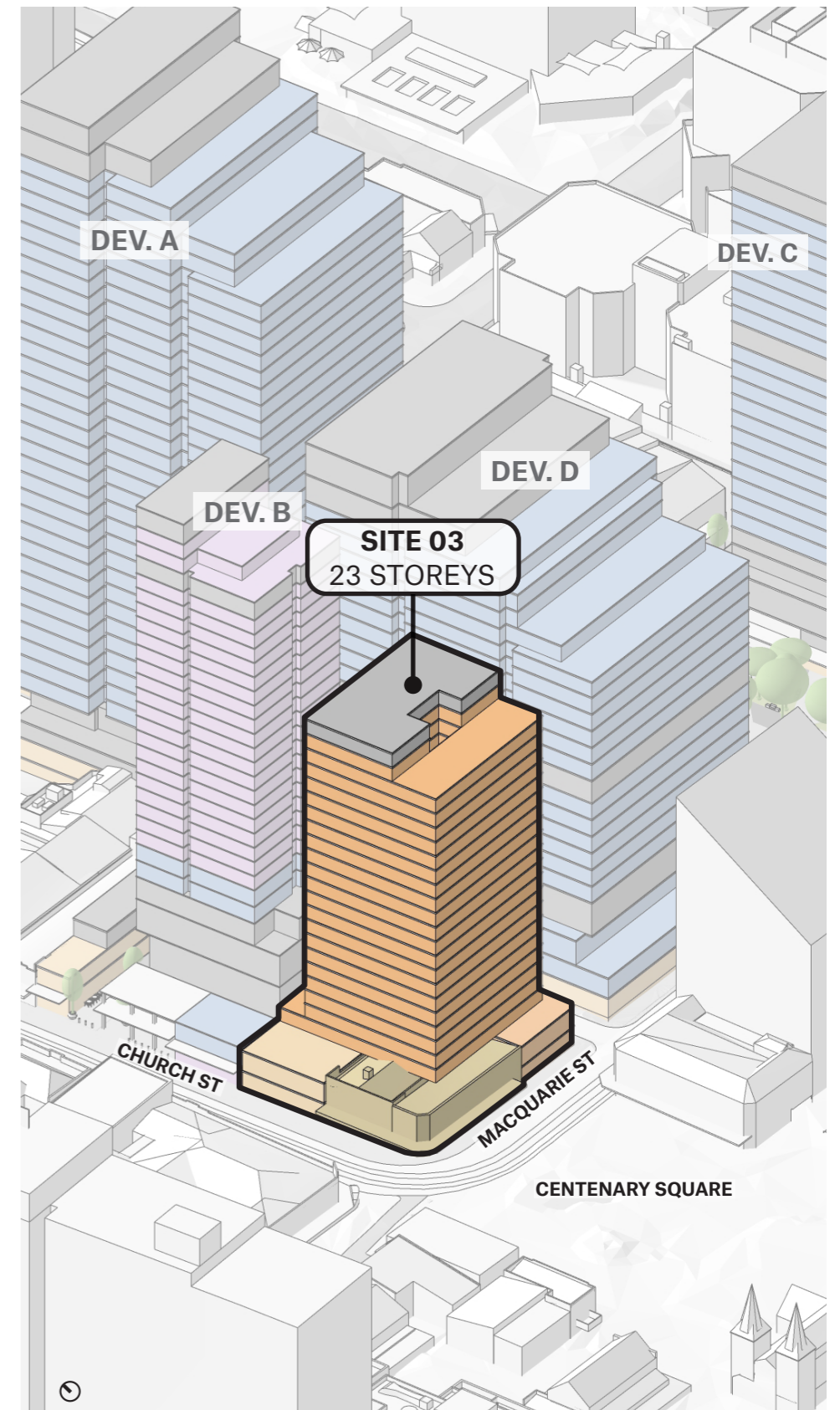


Figure 3-11 Site 03 Hotel Isometric

3.4 Study 02 - Hotel

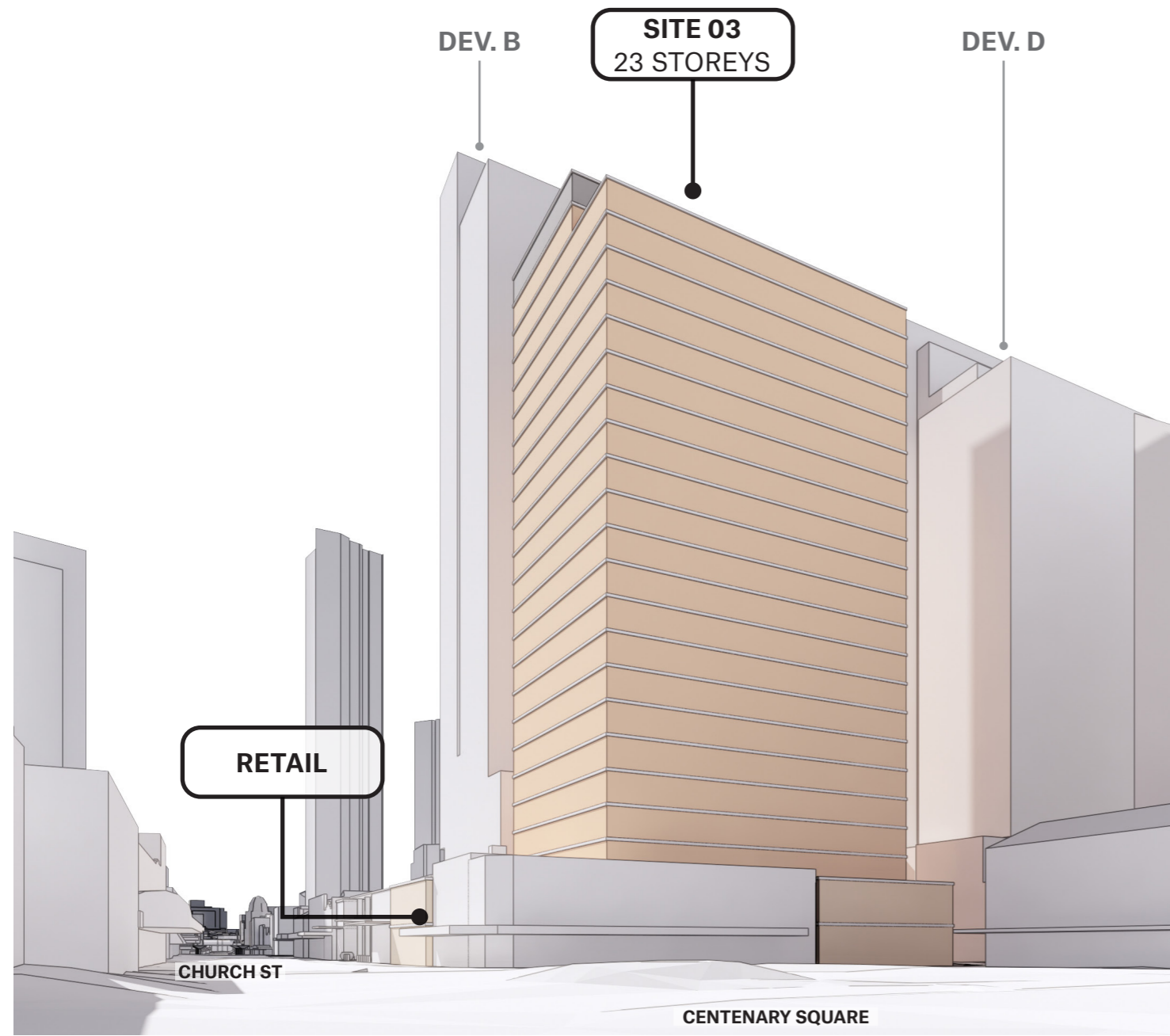
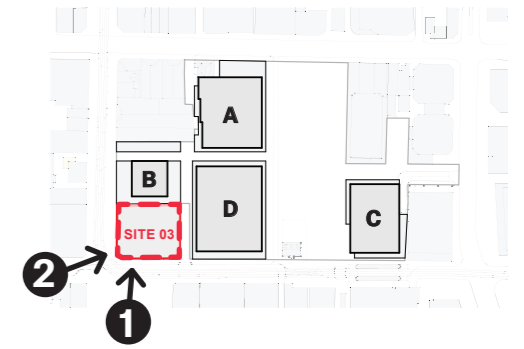


Figure 3-12 1. View of Hotel from Centenary Square

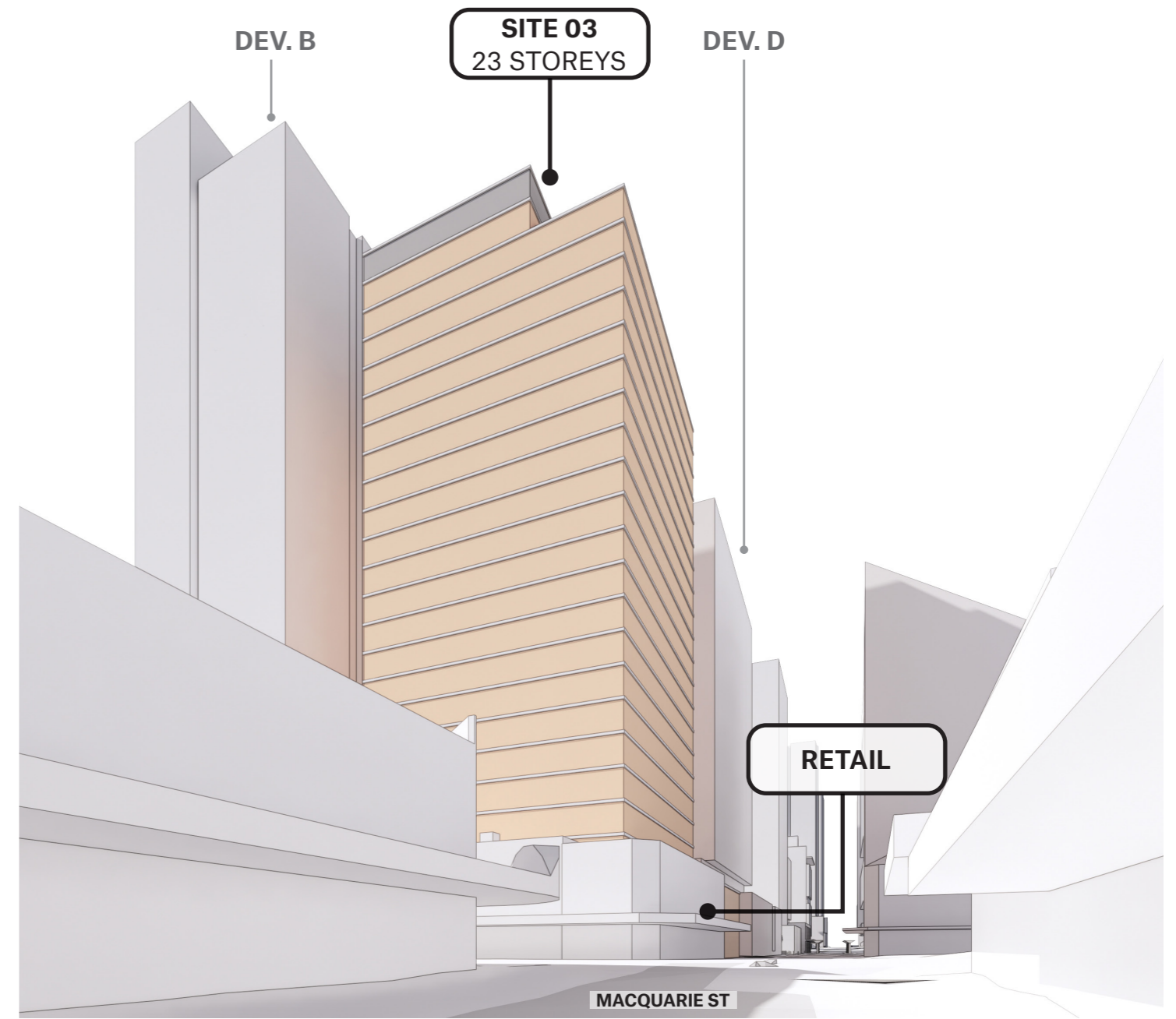


Figure 3-13 2. View of Hotel from Macquarie St

Site 03

3.5 Study 03 - Residential

Tower Setbacks

Church St:	12m (align to Dev B)
Macquarie St:	6m (align to Dev D)
United Lane:	7m
Northern Boundary:	12m

Building Separations

18m to Residential Development B (blank southern facade to blank northern facade.)
 19m to Commercial Development D.

Height of Building

Ground floor plus 23 storeys.
 Approx. 85.2m above ground.

Development Areas

Site Area:	20,660m ²
Target FSR:	10 : 1
Permissible GFA:	20,660m ²
Total GBA:	23,639m ²
Total GFA:	18,500m ²
Total GFA/GBA efficiency:	78%
FSR:	8.96 : 1
Commercial/Retail FSR	1 : 1
Approx. Total Apartments:	135 Apts

This study demonstrates that a residential development with 71% cross flow and approx 60% solar access can be achieved on the site. A podium with retail at Ground and Level 01 can achieve the minimum commercial FSR requirements.

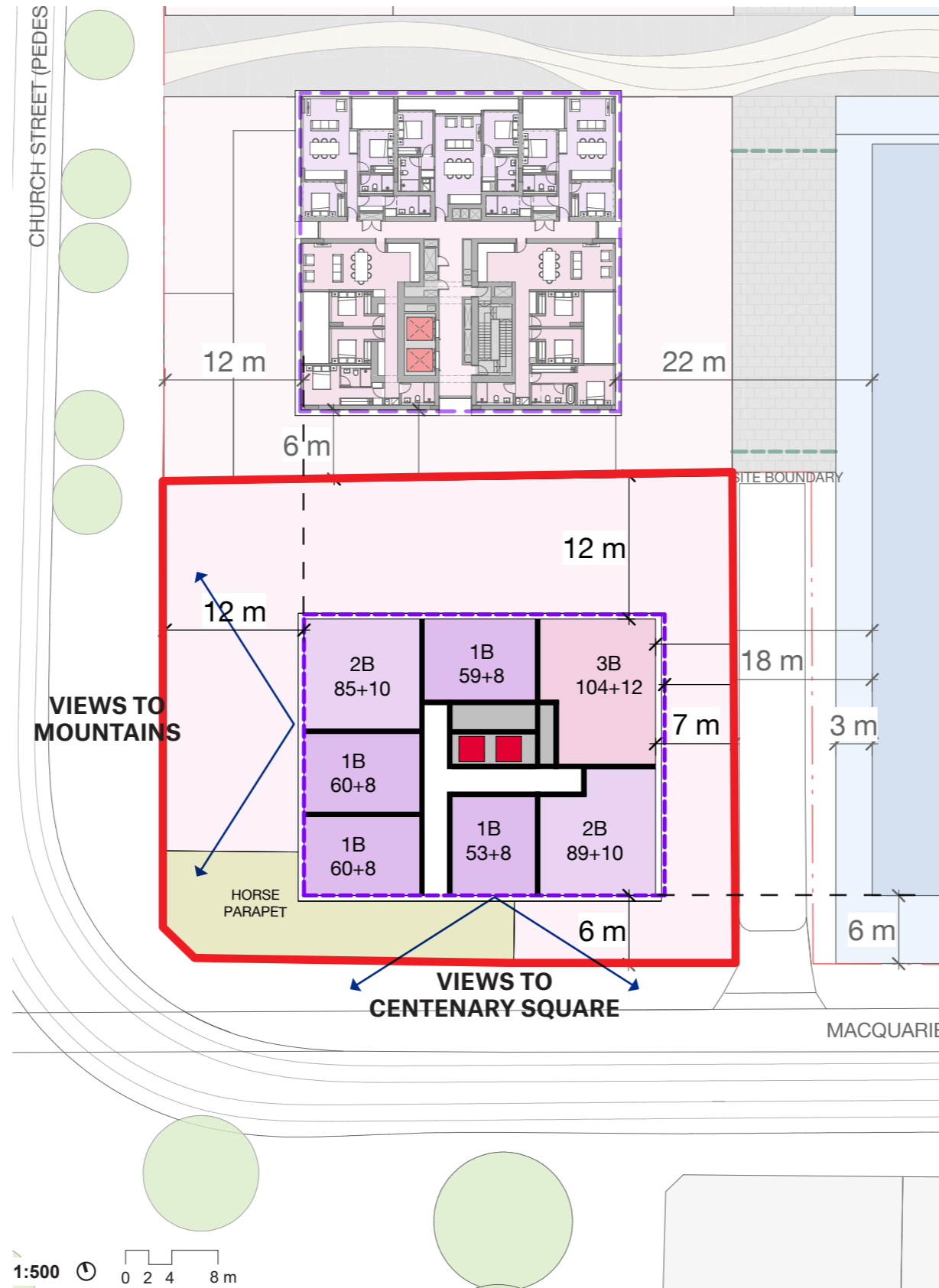


Figure 3-14 Site 03 Residential plan

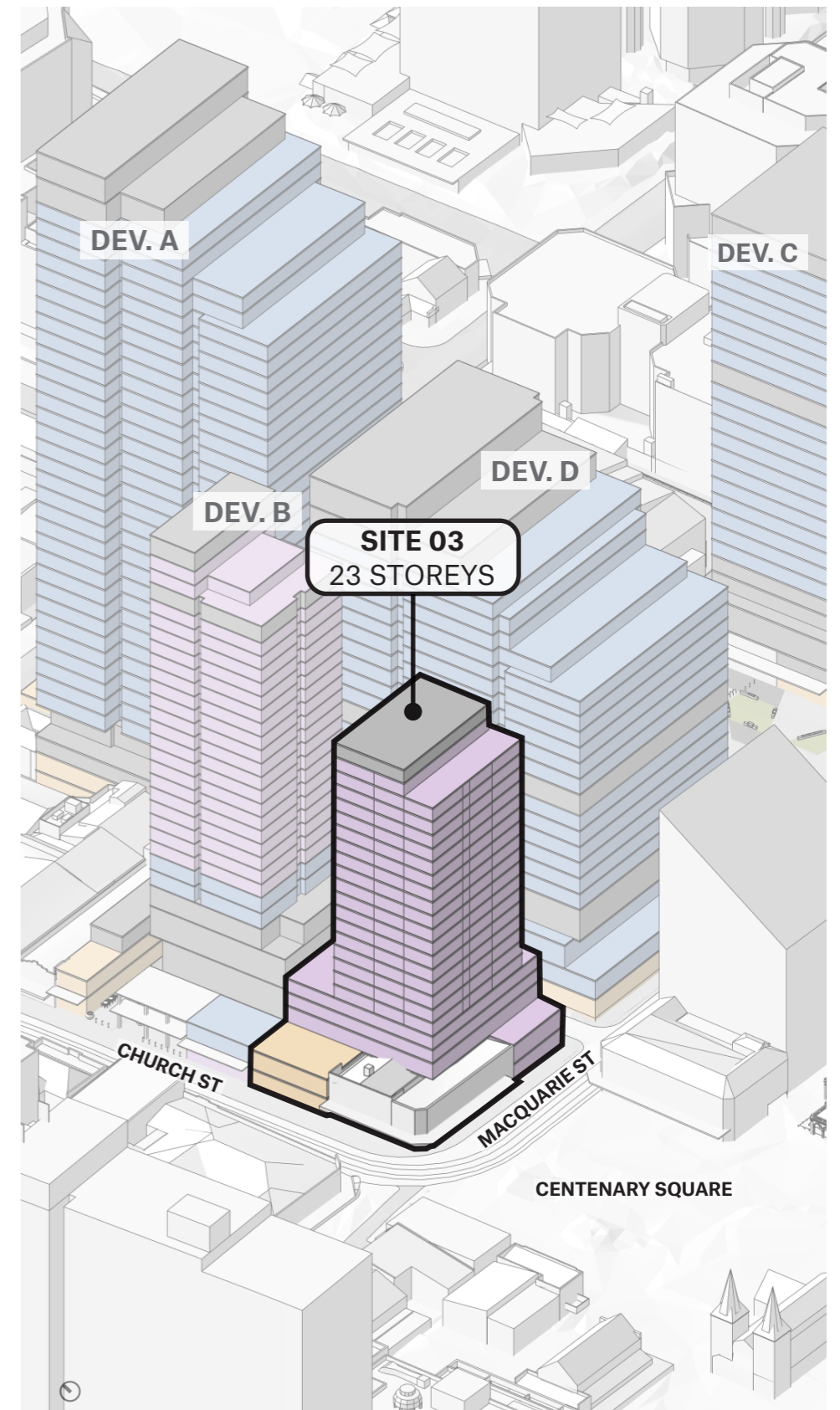


Figure 3-15 Site 03 Residential Isometric

3.5 Study 03 - Residential

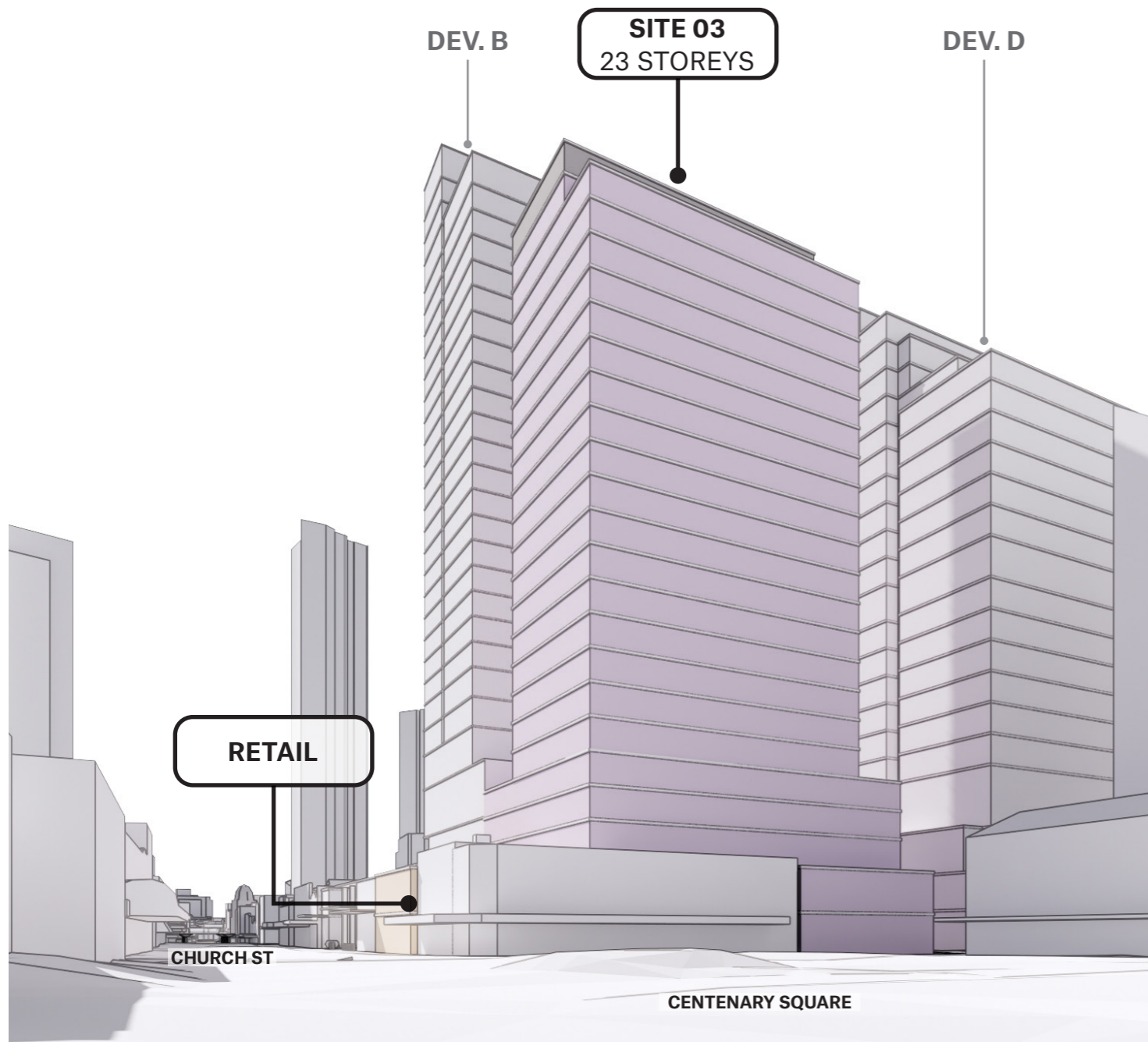
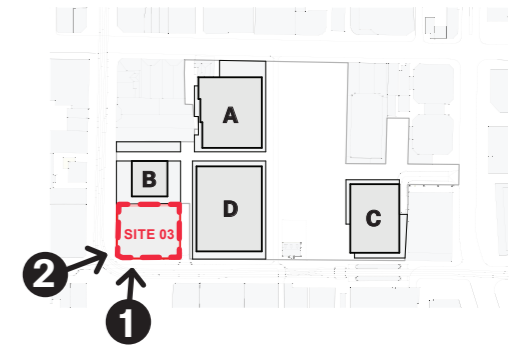


Figure 3-16 1. View of Residential from Centenary Square

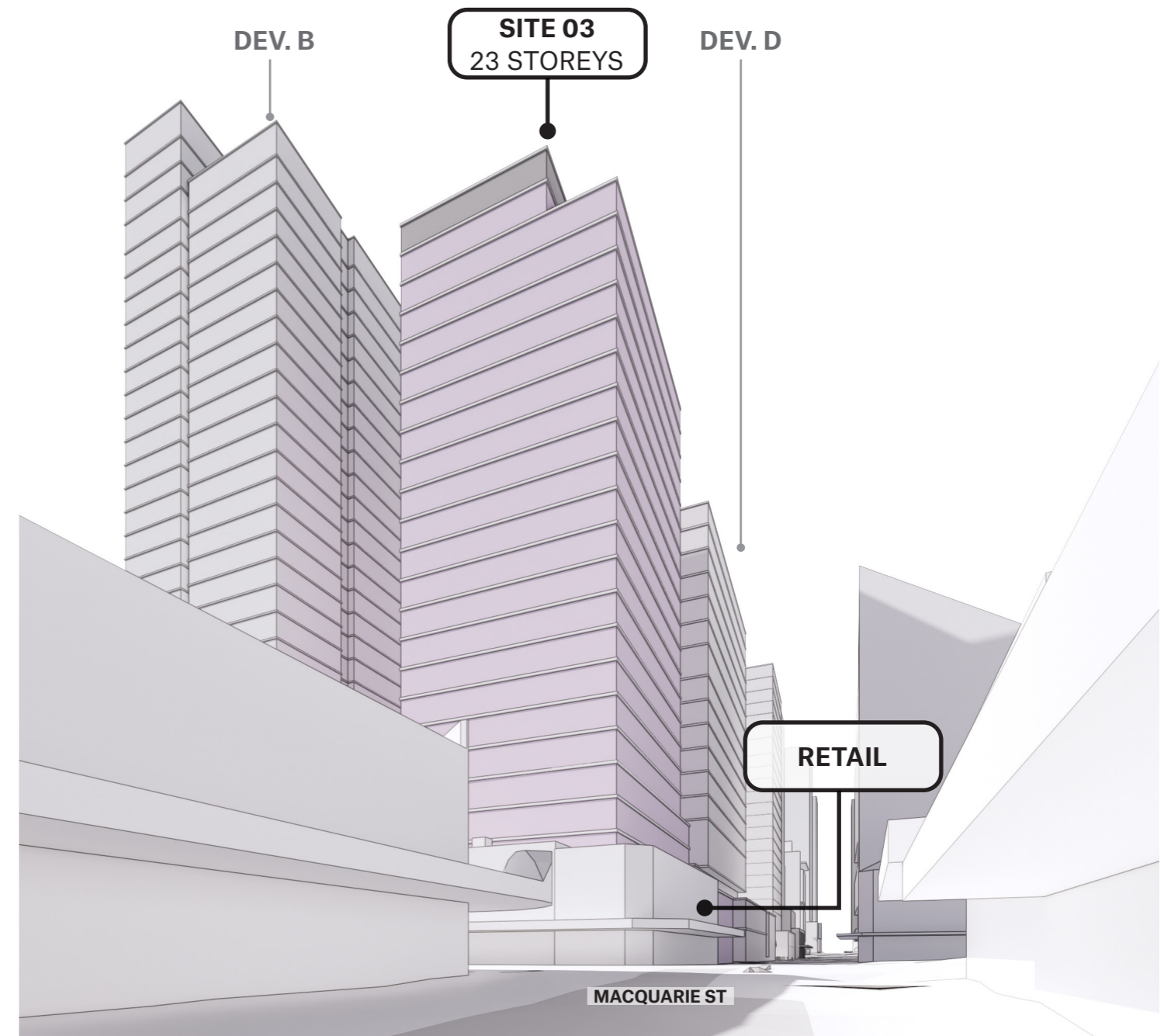


Figure 3-17 2. View of Residential from Macquarie St

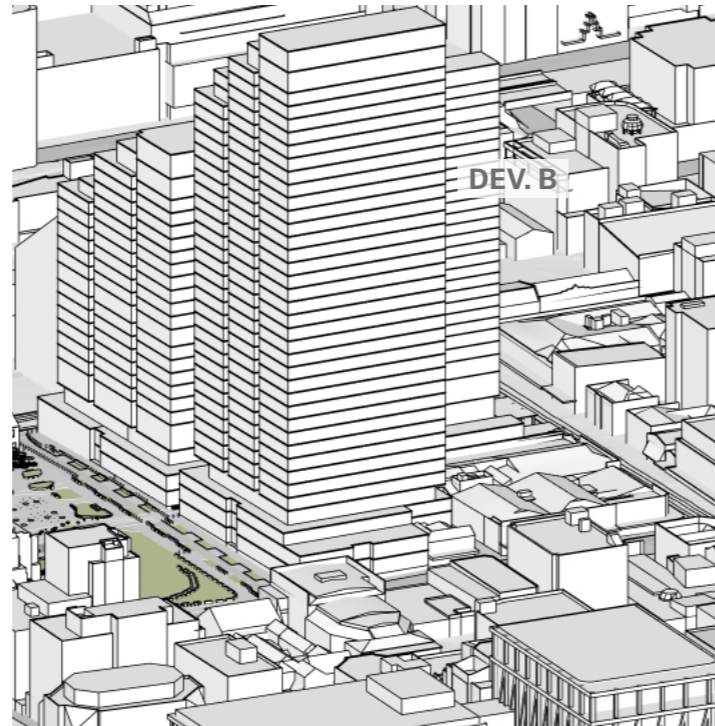
3.5 Study 03 - Residential

Solar Access

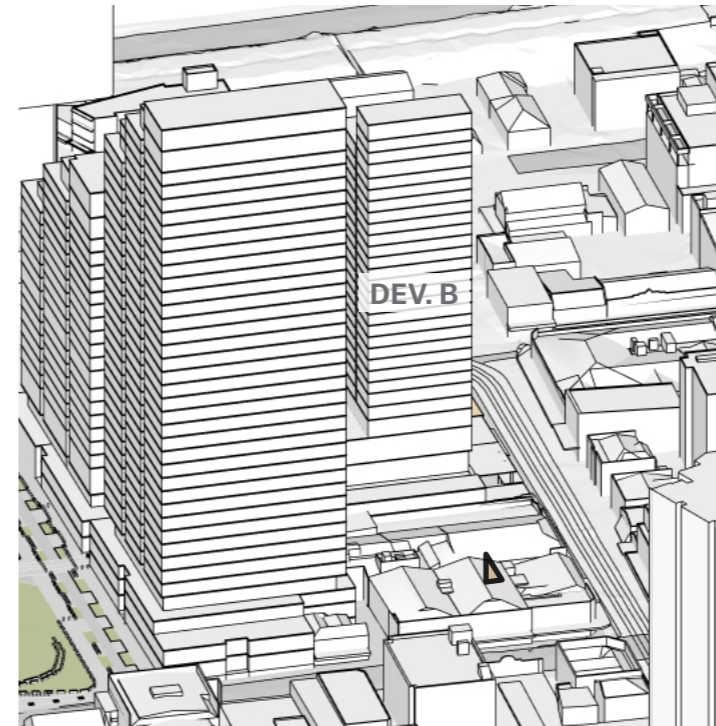
The adjacent diagrams show views from the sun on the 21st of June to an indicative residential development on Site 03. Between 1pm and 3pm, 60% of apartment receive sun which is below the 70% ADG design criteria however the ADG offers additional design guidance where achieving the design criteria may not be possible. This includes:

- where greater residential amenity can be achieved along a busy road or rail line by orientating the living rooms away from the noise source;
- on south facing sloping sites
- where significant views are oriented away from the desired aspect for direct sunlight.

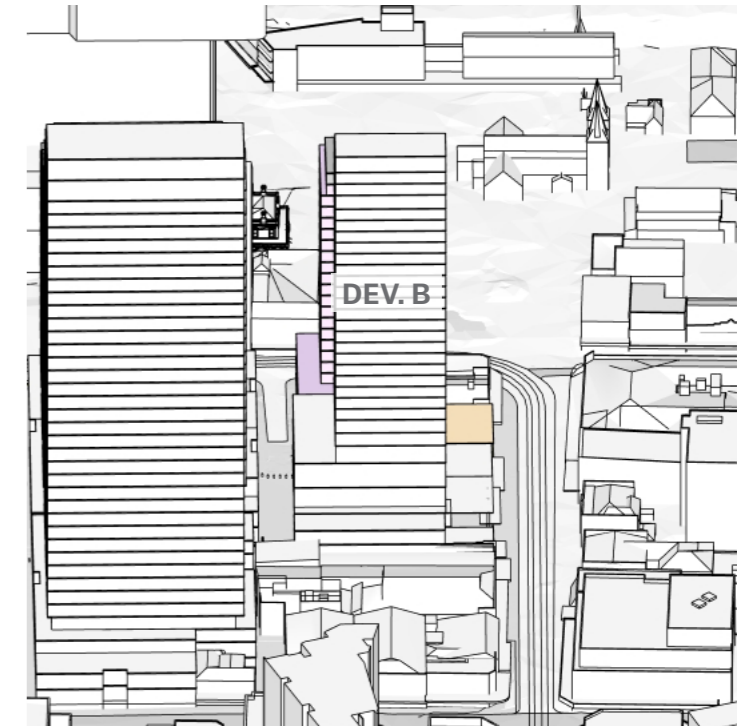
Figure 3-18 June 21 – 09:00 to 15:00



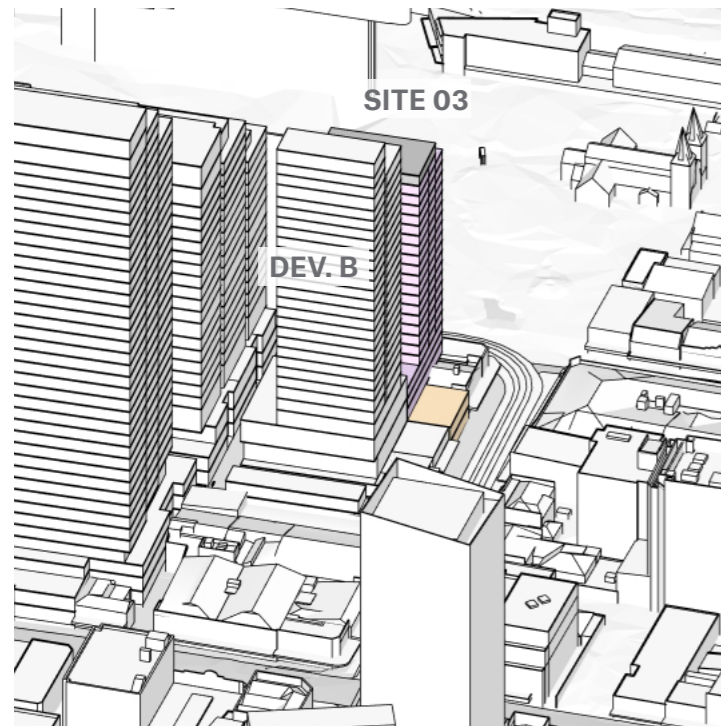
June 21 – 09:00



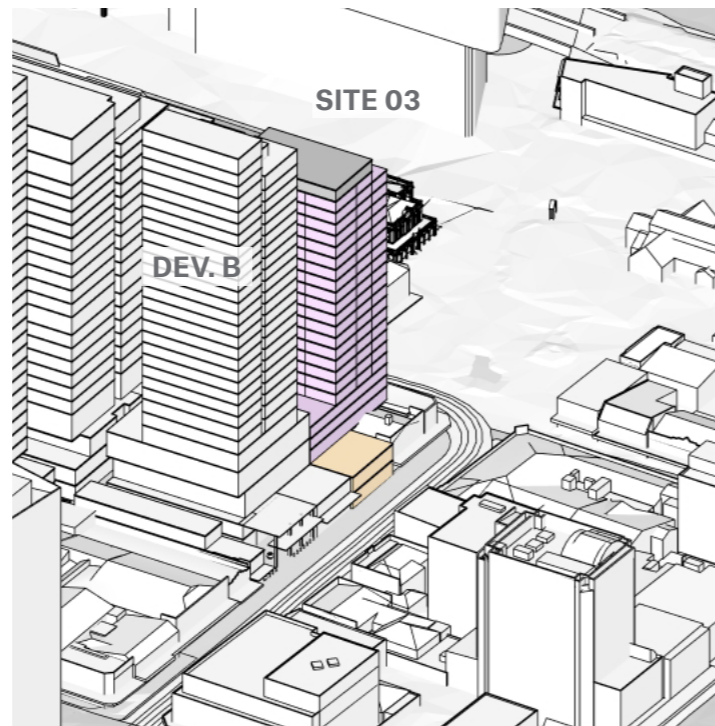
June 21 – 10:00



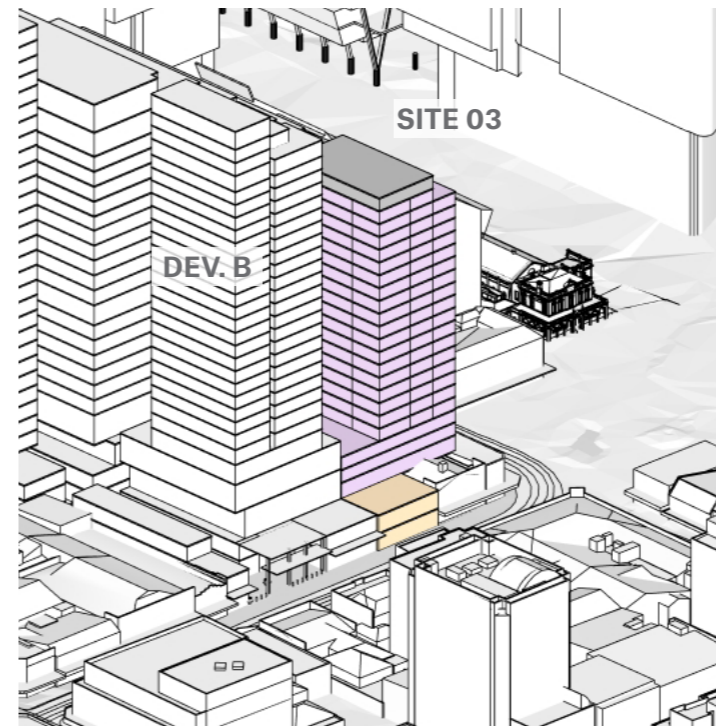
June 21 – 11:00



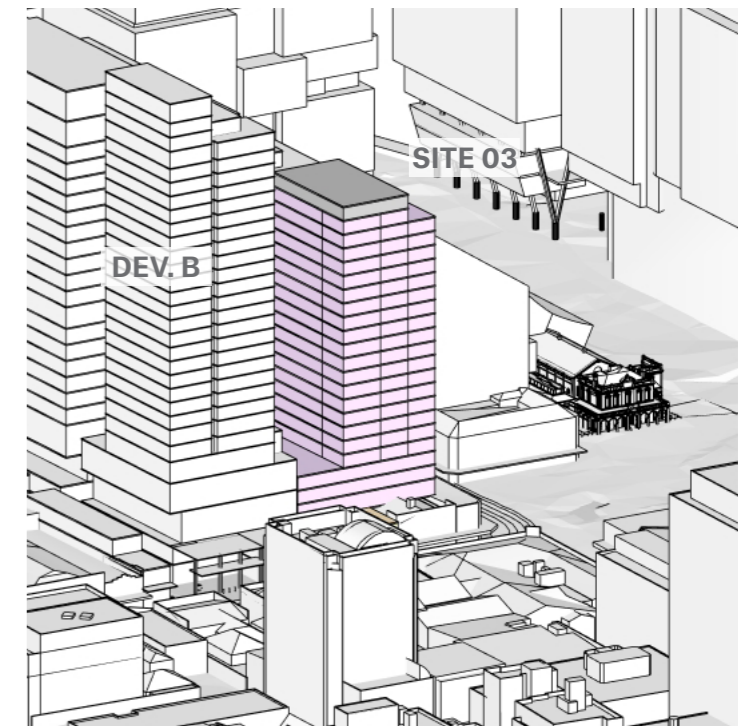
June 21 – 12:00



June 21 – 13:00



June 21 – 14:00



June 21 – 15:00

3.6 Summary

The maximum residential scheme achievable on Site 03 is at a total FSR of **8.96:1**, due to the Solar Access protection plane to Parramatta Square being at its lowest point within the city block where an FSR of 10:1 is permitted.

It follows that a lower FSR outcome is likely when compared to sites with the same zoning and permissible FSR conditions further to the north.

Option 01 - Commercial

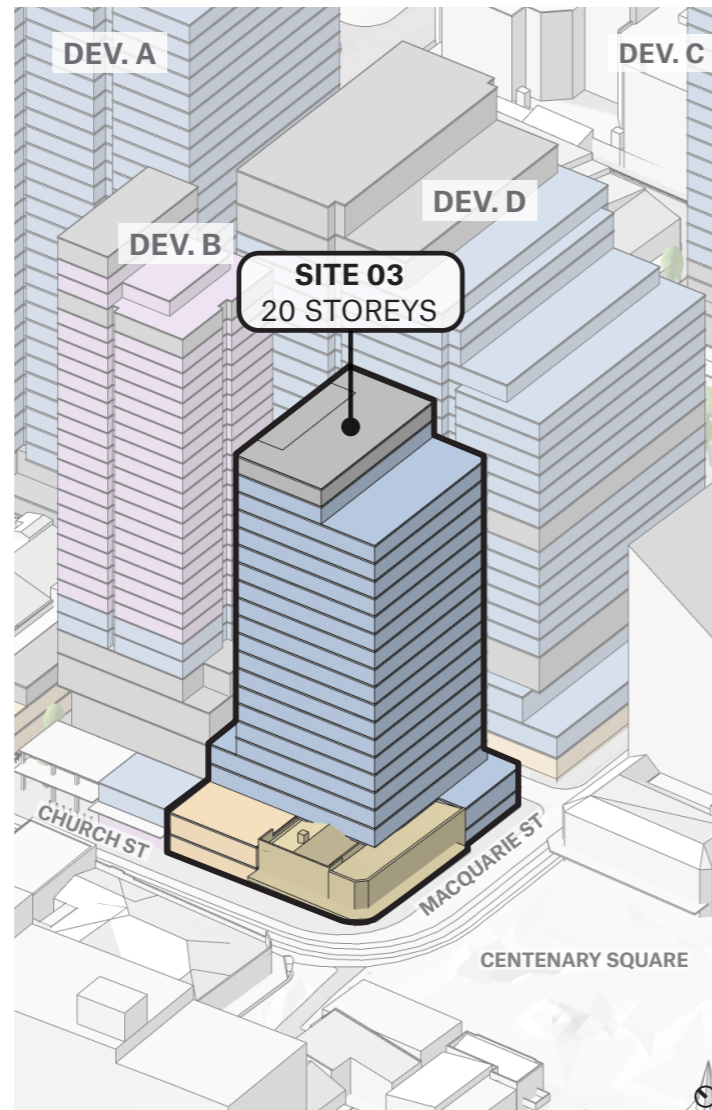


Figure 3-19 Site 03 Commercial Office Isometric

Permissible GFA:	20,660m ²
Total GBA:	24,644m ²
Total GFA:	19,934m ²
Total GFA/GBA efficiency:	81%
Total FSR:	9.65 : 1

Option 02 - Hotel

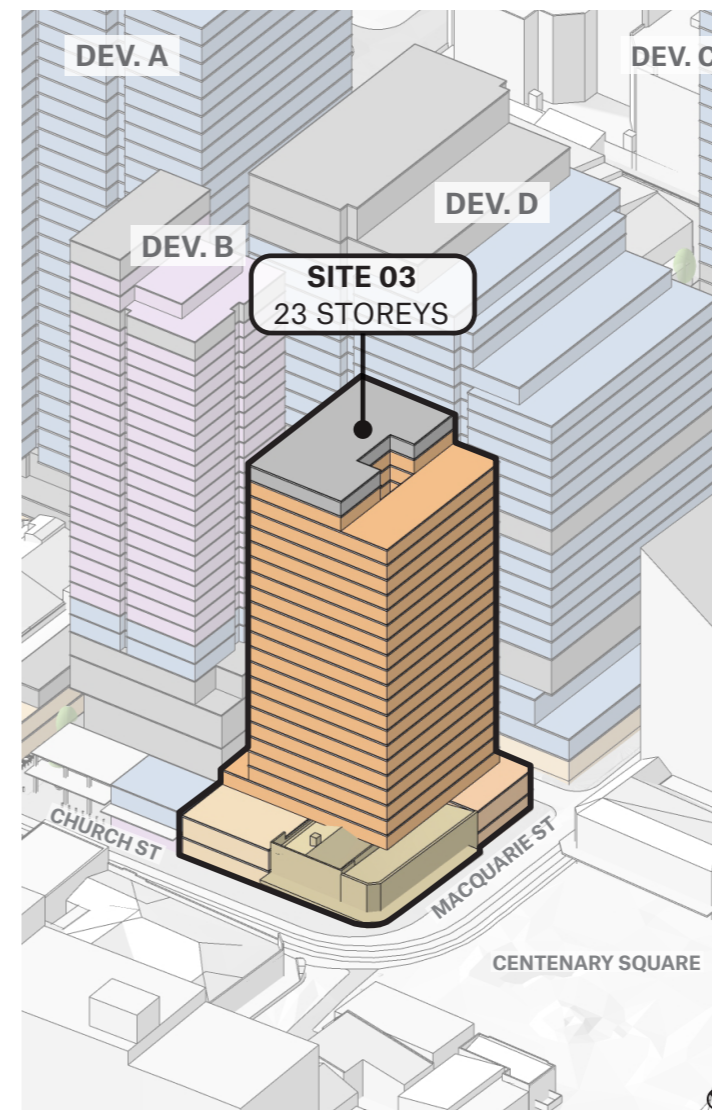


Figure 3-20 Site 03 Hotel Isometric

Permissible GFA:	20,660m ²
Total GBA:	27,637m ²
Total GFA:	22,830m ²
Total GFA/GBA efficiency:	83%
Total FSR:	11.05 : 1
Min. Commercial FSR:	1 : 1
Approx. Total Keys:	340

Option 03 - Residential

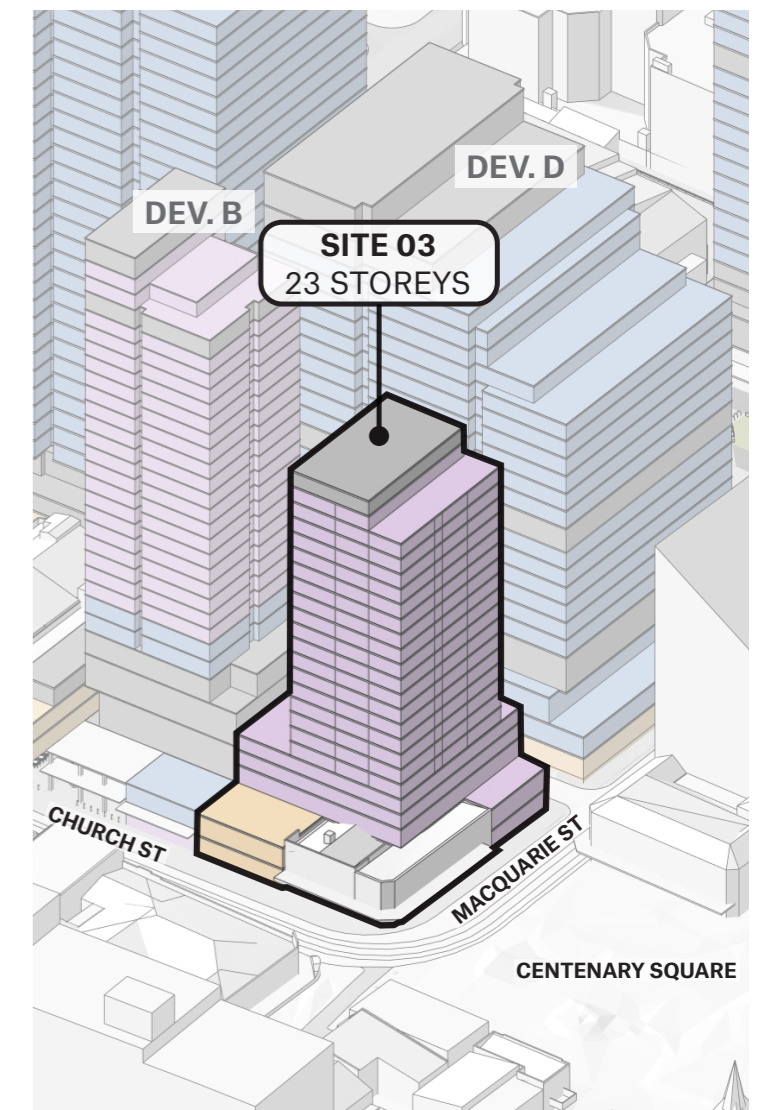


Figure 3-21 Site 03 Residential Isometric

Permissible GFA:	20,660m ²
Total GBA:	23,639m ²
Total GFA:	18,500m ²
Total GFA/GBA efficiency:	78%
Total FSR:	8.96 : 1
Min. Commercial FSR:	1 : 1
Approx. Total Apartments:	135 Apts

