

Submissions and Amendment Report

SSD-70283710

*Crescent Parklands
1 Crescent Street, Holroyd*

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Project Code	P0021657
Report Number	Submissions and Amendment Report (SSD-70283710) Crescent Parklands (FINAL – 14 November 2025)

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The river is the symbol of the Dreaming and the journey of life. The circles and lines represent people meeting and connections across time and space. When we are working in different places, we can still be connected and work towards the same goal.

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Glossary and Abbreviations

Reference	Description
ACHAR	Aboriginal Cultural Heritage Assessment Report
ACM	Asbestos Containing Material
AEP	Annual Exceedance Probability
AHD	Australia Height Datum
AHIMS	Aboriginal Heritage Information Management System
AIA	Arboricultural Impact Assessment
ANEF	Australian Noise Exposure Forecast
AQIA	Air Quality Impact Assessment
ARI	Average Recurrence Interval
ASS	Acid Sulphate Soils
BAM	Biodiversity Assessment Method
BC Act	<i>Biodiversity Conservation Act 2016</i>
BC Regulation	<i>Biodiversity Conservation Regulation 2017</i>
BCA	Building Code of Australia
BDAR	Biodiversity Development Assessment Report
CBD	Central Business District
CEEC	Critically Endangered Ecological Community
Concept DA	Concept Development Application
CDCP 2021	<i>Cumberland Development Control Plan 2021</i>
CEMP	Construction Environmental Management Plan
Cumberland LEP 2021	<i>Cumberland Local Environmental Plan 2021</i>
CMP	Construction Management Plan
COPC	Contaminants of Potential Concern
CPCP	Cumberland Plain Conservation Plan
CPTED	Crime Prevention Through Environmental Design
CTMP	Construction Traffic Environmental Plan
CWC	Connecting with Country
DCDB	Digital Cadastral Data Base
DCP	Development Control Plan
DP	Deposited Plan

DPHI	NSW Department of Planning, Housing and Infrastructure
DSI	Detailed Site Investigation
EDC	Estimated Development Cost
EIS	Environmental Impact Statement
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i>
EPA	NSW Environment Protection Authority
EPA Regulation	<i>Environmental Planning and Assessment Regulation 2021</i>
EPBC Act	<i>Environment Protection and Biodiversity Conservation Act 1999</i>
EPI	Environmental Planning Instrument
ESCP	Erosion and Sediment Control Plan
ESD	Ecologically Sustainable Development
FSR	Floor Space Ratio
GANSW	NSW Government Architect
GFA	Gross Floor Area
GIS	Geographic Information System
GTP	Green Travel Plan
HIPAP	Hazardous Industry Planning Advisory Paper
HIS	Heritage Impact Statement
Housing SEPP	<i>State Environmental Planning Policy (Housing) 2021</i>
HPC	Housing and Productivity Commission
HRV	Heavy Rigid Vehicle
LAeq	A frequency-weighted Equivalent Continuous Sound Level
LEC	NSW Land and Environment Court
LEP	Local Environmental Plan
LGA	Local Government Area
LSPS	Local Strategic Planning Statement
LTEMP	Long-Term Environmental Management Plan
MNES	Matters of National Environmental Significance
MRV	Medium Rigid Vehicle
MUSIC	Model for Urban Stormwater Improvement Conceptualisation
NML	Noise Management Level
NRAR	Natural Resource Access Regulator
NSW	New South Wales

NVIA	Noise and Vibration Impact Assessment
OEMP	Operational Environmental Management Plan
Resilience & Hazards SEPP	<i>State Environmental Planning Policy (Resilience and Hazards) 2021</i>
PAD	Potential Archaeological Deposit
PBP	Planning for Bushfire Protection
PCT	Plant Community Type
PMF	Probable Maximum Flood
POM	Plan of Management
PSI	Preliminary Site Investigation
Planning Systems SEPP	<i>State Environmental Planning Policy (Planning Systems) 2021</i>
PRCUTS	Parramatta Road Corridor Urban Transformation Strategy
PLTMP	Preliminary Long-Term Management Plan
RAP	Remediation Action Plan
Roads Act	<i>Roads Act 1993</i>
RWPs	Remediation Work Plans
SAII	Serious and Irreversible Impacts
SARs	Commonwealth Supplementary Assessment Requirements
SEARs	Secretary's Environmental Assessment Requirements
SEPP	State Environmental Planning Policy
SIA	Social Impact Assessment
SIDRA	Signalised and Unsignalised Intersection Design and Research Aid
Site	Lot 700 DP 1241836 (also known as 1 Crescent Street, Holroyd)
SSD	State Significant Development
SSDA	State Significant Development Application
Sustainable Buildings SEPP	<i>State Environmental Planning Policy (Sustainable Buildings) 2022</i>
Transport & Infrastructure SEPP	<i>State Environmental Planning Policy (Transport and Infrastructure) 2021</i>
TfNSW	Transport for NSW
TIA	Transport Impact Assessment
TPP	Tree Protection Plan
TPZ	Tree Protection Zones
VIA	Visual Impact Assessment
VIS	Vegetation Integrity Score

Water Management Act	<i>Water Management Act 2000</i>
WCM	Water Cycle Management
WIA	Wind Impact Assessment
WMP	Waste Management Plan
WSUD	Water Sensitive Urban Design

Executive Summary

This Submissions and Amendment Report has been prepared on behalf of Tiberius (Holroyd) Pty Ltd (**the applicant**) in relation to the State Significant Development Application (**SSDA**) for a mixed-use residential development at 1 Crescent Street, Holroyd (**the site**).

This report responds to the matters raised by the Department of Planning, Housing and Infrastructure (**DPHI**), other State government agencies and referral authorities, local Councils, utility providers, the community and other relevant stakeholders during public exhibition period of the SSDA (SSD-70283710).

This report also sets out the proposed changes to the development which have arisen as a result of the matters raised within the submissions and includes an assessment of these amendments. The key changes made to the proposed development since public exhibition of the SSDA include a net reduction in car parking, a reduction in the bulk and scale of the development, reduced building footprints, increased provision of residential homes and affordable housing aligned with the revised unit mix, the redistribution of floor space, improved connectivity between the retail / commercial uses and the public domain, enhanced street interfaces, as well as an increase in the overall provision of deep soil and tree canopy coverage.

These amendments extend beyond what can be considered 'minor refinements' capable of being described in a Submissions Report. As a result, a combined Submissions and Amendment Report has been prepared, and consent is sought from DPHI to amend the SSDA in accordance with Section 37 of the *Environmental Planning and Assessment Regulation 2021*.

The updated documentation package may be referred to authorities/agencies and other stakeholders for further review and comment. The amended application may also be publicly exhibited, enabling the community to make new or additional submissions on the proposal. This report includes a detailed assessment of the economic, environmental and social impacts to provide a clear understanding of the amended project, including the merits of the proposed changes.

Original Proposal

The State Significant Development Application (SSD-70283710) was formally lodged with the Department of Planning, Housing and Infrastructure (DPHI) in January 2025 in accordance with Section 26A, Schedule 1 of *State Environmental Planning Policy (Planning Systems) 2021*.

The proposed development as originally lodged sought consent for the following:

- Site establishment works, tree removal, site preparation, earthworks and excavation, services augmentation, and remediation works.
- Development of seven (7) residential buildings comprising four (4) shop top housing buildings and three (3) residential flat buildings, as outlined below:
 - Buildings 1-3 are integrated with an eastern mixed-use podium building, while Building 4 is situated above a mixed residential / commercial space, comprising shop-top housing.
 - Buildings 5-7 consist of residential flat buildings.
- Delivery of 15% of the total floor space as affordable housing (to be distributed across each of the seven (7) residential buildings).
- Approximately 134,000 m² total floor space comprising:
 - A total of 2,500 m² retail GFA and 5,000 m² commercial GFA.
 - 1,227 residential apartments (of which 201 are for affordable housing).
 - Communal amenity facilities for residents.
 - Building services areas.

- Shared car parking for Buildings 1-3 and the commercial and retail tenancies within the podium.
- Shared car parking for Buildings 4-7 on the lower ground levels and within the above ground parking structures adjoining Buildings 5 and 6.
- Landscaping and accompanying place-making works including:
 - Public open space, and hard and soft landscape works.
 - Ground and rooftop communal open space.
 - Publicly accessible through-site links.
 - At grade car parking for the park, forecourt and retail areas.
 - Vehicle access via a new internal publicly accessible road and vehicle accessway.
 - New pedestrian footpaths and access arrangements to the site.
 - Kiosk tenancy within park-side structure.
- Staged completion of a public park.
- Associated works involving the widening of Crescent Street and road upgrades to Crescent Street

The SSDA was placed on public exhibition between 7 February 2025 and 6 March 2025, and was referred to other State government authorities, referral agencies, local Councils, and relevant utility service providers for review and comment.

Analysis of Submissions

A total of 12 submissions were received from DPHI, local Councils, NSW Government agencies, utility providers, and members of the local community including:

- City of Parramatta Council
- Cumberland City Council
- Department of Climate Change, Energy, the Environment and Water (**DCCEEW**), including:
 - Conservation Programs, Heritage and Regulation (**CPHR**) Group
 - Heritage NSW
 - Heritage Council of NSW
 - Water Group
- Department of Planning, Housing and Infrastructure (**DPHI**)
- Endeavour Energy
- Fire and Rescue NSW (**FRNSW**)
- Sydney Trains
- Sydney Water
- Transport for NSW (**TfNSW**)

A total of four (4) submissions were received from members of the local community. These submissions primarily related to the potential impacts of the proposed development, particularly in relation to traffic, noise, pedestrian connectivity and the capacity of existing public infrastructure to service the proposed development.

DPHI issued a letter to the applicant on 7 March 2025 requesting a response to the submissions received during the public exhibition and referral of the SSDA. The key issues raised in the submissions included statutory compliance, the overall bulk and scale of the proposed development, the design of landscaping

and open spaces, provision of car parking, traffic and access, contamination, tree removal, amenity, and infrastructure provision.

The key issues raised in the submissions have been categorised and are set out within **Table 3**. This report provides a response to each individual submission within the Submissions Register included at **Appendix A**.

Actions Taken Since Exhibition

In response to the key issues raised within the submissions, design refinements and amendments have been made to the proposed development since public exhibition.

Since the SSDA was publicly exhibited in early 2025, the Applicant has undertaken further consultation with the State Design Review Panel (SDRP), DPHI and Cumberland City Council to discuss the matters raised within their relevant submissions.

Table 4 summarises the additional consultation that has been undertaken since public exhibition of the SSDA. This table also summarises the outcome(s) of this engagement, and how the amended proposal has responded to the matters raised within the submissions. A full list of updated technical assessments and revised modelling (where relevant) is provided within **Table 2**.

Response to Submissions and Proposed Amendments

A detailed response to each of the matters raised within the submissions is set out within the Submissions Register (included at **Appendix A**). The applicant has sought to refine the proposed development in response to matters raised within the submissions, as well as other matters identified during public exhibition of the SSDA.

The key changes made to the proposed development since public exhibition of the SSDA include:

- A net reduction in car parking, and an increase in bicycle parking.
- A reduction in overall height, bulk and scale, including reduced building footprints.
- Increased number of apartments including the provision of additional affordable housing.
- Improved connectivity at the ground floor, and better alignment between the retail / commercial uses and the public domain.
- Enhanced street interfaces, more activated facades and refinements to materiality.
- Redistribution of floor space achieved through more efficient space planning and refined building layouts.
- Improved quality of communal open space (particularly for Stage B and Stage C).
- Increase in the overall provision of deep soil and tree canopy coverage.

The changes extend beyond minor refinements and accordingly, this report is divided into two parts: Part 1 being the Submissions Report and Part 2 containing the Amendment Report. Detailed justification of the proposed development is also provided, having regard to both the response to submissions and the amended proposal.

This Submissions and Amendment Report has been prepared in accordance with the *State Significant Development Guidelines – Preparing a Submissions Report (Appendix C)* dated March 2024 and the *State Significant Guidelines – Preparing an Amendment Report (Appendix D)* dated October 2022.

Justification of the Amended Project

This Submissions and Amendment Report assesses the amended proposal in accordance with the relevant planning framework and outlines the mitigation measures required (where relevant) to avoid, mitigate, minimise and / or offset any adverse impacts as a result of the amended proposal.

The key matters identified for detailed assessment for the amended proposal include:

- Urban design and built form.
- Environmental amenity.
- Trees and landscaping.
- Traffic, transport and access.
- Noise and vibration.
- Contamination and Remediation.

For each of the likely impacts identified in the assessment of key issues, the impact will either be positive or appropriate mitigation measures are able to be adopted to ensure that any adverse impacts as a result of the amended proposal can be suitably managed.

The amended proposal represents a positive development outcome for the site and surrounding area for the following reasons.

- **The amended proposal is consistent with state and local strategic planning policies:**
 - *National Housing Accord*
 - *Housing 2041: NSW Housing Strategy*
 - *Greater Sydney Region Plan: A Metropolis of Three Cities*
 - *Our Greater Sydney 2056: Central City District Plan*
 - *GANSW Better Placed*
 - *Cumberland 2030: Local Strategic Planning Statement*
 - *Cumberland Local Housing Strategy*
- **The amended proposal satisfies the applicable local and state development controls:**
 - *State Environmental Planning Policy (Planning Systems) 2021 (Planning Systems SEPP 2021)*
 - *State Environmental Planning Policy (Resilience and Hazards) 2021 (Resilience and Hazards SEPP 2021)*
 - *State Environmental Planning Policy (Housing) 2021 (Housing SEPP 2021)*
 - *State Environmental Planning Policy (Transport and Infrastructure) 2021 (Transport and Infrastructure SEPP 2021)*
 - *State Environmental Planning Policy (Sustainable Buildings) 2022 (Sustainable Buildings SEPP 2022)*
 - *State Environmental Planning Policy (Biodiversity and Conservation) 2022 (Biodiversity and Conservation SEPP 2022)*
 - *Cumberland Local Environmental Plan 2021 (Cumberland LEP 2021)*
 - *Cumberland Development Control Plan 2021 (Cumberland DCP 2021)*
- **The amended design responds appropriately to the opportunities and constraints presented by the site for the following reasons:**
 - It transforms a vacant former industrial site into a vibrant mixed-use precinct, comprising housing, retail and commercial floor space and accompanying open space.
 - It delivers significant and much needed new housing into the Cumberland LGA, in a well-connected area, walkable to public transport and just a short distance from the Parramatta CBD.

- It creates a self-sustaining environment for future residents and the surrounding community comprising significant open space, shops and services.
- It delivers a significant new public park comprising a diversity of elements to respond to a broad cross section of the local community demographic.
- It complements and connects with the local neighbourhood including connections with Holroyd Sportsground and regional bicycle links.
- It delivers design excellence in terms of a new apartment tower typology for the site, which can be accommodated without adverse impact on the surrounding amenity.
- It provides high quality residential amenity in terms of apartment design, accompanying open space and a diversity of apartment types including affordable housing blended across all seven (7) buildings within the proposed development.

The amended proposal is suitable for the site for the following reasons:

- It aligns with the strategic intent to increase housing supply in key locations, particularly those near major transport nodes.
- It offers a mix of uses that will support population growth for both residents and workers in a strategic area. This reinforces Cumberland LGA's role as a residential community and stimulates a competitive employment market by creating a more active and attractive precinct.
- It delivers high-quality housing at a key site, enhancing housing stability and diversity in Holroyd. It includes 15% affordable housing within a mixed-use development.
- It is consistent with the objectives of the Mixed Use zone, and the proposed land uses are permissible with consent on the site.
- It provides a significant quantum of green open space, connecting the site to the green network across Holroyd and optimising amenity for residents and visitors. A total of 18,175 m² of public open space and 13,539 m² of deep soil are being provided.

The amended proposal is in the public interest for the following reasons:

- **Site Renewal** – It facilitates the renewal of a vacant contaminated site within close proximity of a strategic centre, benefiting from its proximity to critical transport and social infrastructure.
- **Integrated Mixed-Use Development** – It provides integrated mixed-use buildings in a location ideally suited to support such a development.
- **Employment Opportunities** – It generates a significant number of full-time positions within the commercial and retail areas. It will establish a viable commercial presence on the site, meeting the future needs of residents and workers throughout the precinct.
- **Streetscape Enhancement** – It will enhance and activate the streetscape through high-quality architecture and landscaping.
- **Central Park and Green Corridor** – It includes a new central park designed with amenities that complement the surrounding Holroyd Sports Ground and Parramatta Train Terminus Memorial Park. This park will serve as a green corridor, linking the existing parks and providing a welcoming and attractive space for residents and visitors.
- **New affordable and market Apartments** – It provides 1,374 apartments, of which 220 will be affordable housing managed by a CHP. Leveraging the accessible location and proximity to services and existing and train networks with direct connections to major employment destinations.

As demonstrated within this report, the proposed development (as amended) has significant merit and alignment with State and local planning policies. Any perceived impacts have been appropriately managed through implementation of mitigation measures set out within this report and supporting documentation.

1

Introduction

1 Introduction

This Submissions and Amendment Report has been prepared on behalf of Tiberius (Holroyd) Pty Ltd (**the applicant**) in relation to the State Significant Development Application (**SSDA**) for a mixed-use residential development at 1 Crescent Street, Holroyd (**the site**). This Submissions and Amendment Report has been prepared to address the matters raised by referral authorities, local Councils, the community and other relevant stakeholders throughout the public exhibition period. This report also sets out the proposed amendments to the development which have arisen as a result of the matters raised within the submissions.

The SSDA for Crescent Parklands was lodged with the Department of Planning, Housing and Infrastructure (**DPHI**) in January 2025 (SSD-70283710). The SSDA was placed on public exhibition for 28 days between Friday 7 February 2025 until Thursday 6 March 2025 and was referred to key stakeholders for comment including other State government agencies, referral authorities, Cumberland City Council, City of Parramatta Council and utility service providers. Each of the submissions received have been comprehensively reviewed and considered by the Applicant in the preparation of this report.

The proposed development (as originally lodged) has been refined and amended in response to feedback received from DPHI and relevant stakeholders throughout the public exhibition period. The proposed changes include a net reduction in car parking, a reduction in overall bulk and scale, increased provision of residential homes and affordable housing, improved connectivity at the ground floor, enhanced street interfaces and façade refinements, a redistribution of floor space through more efficient space planning, improved quality of communal open space, and an increase in deep soil and canopy coverage. The updates extend beyond minor refinements which are capable of being described in a Submissions Report. As a result, an Amendment Report is also required to facilitate assessment of the amended proposal.

This combined Submissions and Amendment Report is divided into two parts:

- Part 1 – Submissions Report (refer to **Section 2**)
- Part 2 – Amendment Report (refer to **Section 3**)

The potential impacts of the proposed development (as amended) have been assessed as part of this Submissions and Amendment Report. Detailed justification of the project is also provided, having regard to both the submissions received as well as the amended proposal.

This Submissions and Amendment Report has been prepared in accordance with the *State Significant Development Guidelines – Preparing a Submissions Report (Appendix C) dated March 2024* and the *State Significant Guidelines – Preparing an Amendment Report (Appendix D) dated October 2022*.

1.1 Applicant Details

The applicant details for the proposed development are set out in the following table.

Table 1 Applicant Details

Description	Proponent Details
Proponent	Tiberius (Holroyd) Pty Ltd (ABN 61 061 131 959) atf the Holroyd Unit Trust (ABN 42 891 308 354)
Postal Address	Level 3, 30 Kings Park Road, West Perth, WA, 6005
ABN / ACN	ABN 61 061 131 959 ABN 42 891 308 354
Nominated Contact	Belinda Thomas – Associate Director E bthomas@urbis.com.au P +61 2 8233 9900

1.2 Project Overview

The site is located at 1 Crescent Street, Holroyd and is legally described as Lot 700 in DP 1241836. The location of the site is shown in the following figure. The site has a total area of 37,877 m² comprising one (1) allotment which is irregular in shape.

Figure 1 Aerial Map of Site Location



Source: Urbis (2024)

The SSDA as originally lodged (and exhibited) sought consent for the following:

- Site establishment works, tree removal, site preparation, earthworks and excavation, services augmentation, and remediation works.
- Development of seven (7) residential buildings comprising four (4) shop top housing buildings and three (3) residential flat buildings, as outlined below:
 - Buildings 1-3 are integrated with an eastern mixed-use podium building, while Building 4 is situated above a mixed residential / commercial space, comprising shop-top housing.
 - Buildings 5-7 consist of residential flat buildings.
- Delivery of 15% of the total floor space as affordable housing (to be distributed across each of the seven [7] residential buildings).
- Approximately 134,000 m² total floor space comprising:
 - A total of 2,500 m² retail GFA and 5,000 m² commercial GFA.
 - 1,227 residential apartments (of which 201 are for affordable housing).
 - Communal amenity facilities for residents.

- Building services areas.
- Shared car parking for Buildings 1-3 and the commercial and retail tenancies within the podium.
- Shared car parking for Buildings 4-7 on the lower ground levels and within the above ground parking structures adjoining Buildings 5 and 6.
- Landscaping and accompanying place-making works including:
 - Public open space, and hard and soft landscape works.
 - Ground and rooftop communal open space.
 - Publicly accessible through-site links.
 - At grade car parking for the park, forecourt and retail areas.
 - Vehicle access via a new internal publicly accessible road and vehicle accessway.
 - New pedestrian footpaths and access arrangements to the site.
 - Kiosk tenancy within park-side structure.
- Staged completion of a public park.
- Associated works involving the widening of Crescent Street and road upgrades to Crescent Street.

Part 2 of this report (Amendment Report) seeks changes to the exhibited proposal. The proposed development includes the following amendments, for which this SSDA seeks development consent:

- Site establishment works, tree removal, site preparation, earthworks and excavation, services augmentation, and remediation works.
- Development of seven (7) residential buildings comprising four (4) shop top housing buildings and three (3) residential flat buildings, as outlined below:
 - Buildings 1-3 are integrated with an eastern mixed-use podium building, while Building 4 is situated above a mixed residential / commercial space, comprising shop-top housing.
 - Buildings 5-7 consist of residential flat buildings.
- Delivery of 15% of the total floor space as affordable housing (to be distributed across each of the seven [7] residential buildings or within a consolidated building proposed proportionately as buildings are developed).
- Approximately 134,206 m² total floor space comprising:
 - A total of 2,496 m² retail GFA and 2,710 m² commercial GFA.
 - 1,374 residential apartments (of which 220 are for affordable housing).
 - Communal amenity facilities for residents.
 - Building services areas.
- Activation of Crescent Street through a mix of amenity areas and pockets of open space.
- Shared car parking for Buildings 1-3 and the commercial and retail tenancies within the podium.
- Shared car parking for Buildings 4-7 on the lower ground levels and within the above ground parking structures adjoining Buildings 4-5 and 6-7.
- Landscaping and accompanying place-making works including:
 - Public open space, and hard and soft landscape works.
 - Ground and rooftop communal open space.
 - Publicly accessible through-site links.

- At grade car parking for the park, forecourt and retail areas.
- Vehicle access via a new internal publicly accessible road and vehicle accessway.
- New pedestrian footpaths and access arrangements to the site.
- Kiosk tenancy within park-side structure.
- Staged completion of a public park.
- Associated works involving the widening of Crescent Street and road upgrades to the intersection at Crescent Street and Woodville Road.

In accordance with Section 4.5 of the *Environmental Planning and Assessment Act 1979* (EP&A Act), the Minister for Planning and Public Spaces is the consent authority for this proposal.

1.3 Supporting Documentation

This Submissions and Amendment Report is supported by the following technical reports and documentation. These have been revised to reflect the amended proposal.

Table 2 Supporting Documentation

APPENDIX	REPORT	PREPARED BY
Appendix A	Response to Submissions Register	Urbis
Appendix B	Revised Statutory Compliance Table	Urbis
Appendix C	Revised Mitigation Measures	Urbis
Appendix D	Revised Engagement Summary Table	Urbis
Appendix E	Revised Architectural Plans	Woods Bagot
Appendix F	Revised Design Report	Woods Bagot
Appendix G	Revised SEPP 65 Verification Statement	Woods Bagot
Appendix H	List of Revised Architectural Plans for Approval	Urbis
Appendix I	Revised Estimated Development Cost (EDC) Report	WT Partnership
Appendix J	Revised Landscape Plans and Design Report	Arcadia
Appendix K	Revised Arboricultural Impact Assessment (AIA)	Eco Logical
Appendix L	Connecting with Country Cover Letter	Artefact
Appendix M	Aboriginal Cultural Heritage Assessment Letter	Artefact
Appendix N	Revised Biodiversity Development Assessment Report (BDAR)	Narla
Appendix O	Revised Wind Impact Assessment (WIA)	CPP
Appendix P	Revised Transport Impact Assessment (TIA)	TTPP
Appendix Q	Amended Waste Management Plan (WMP)	Elephants Foot
Appendix R	Revised Noise and Vibration Impact Assessment (NVIA)	E-Lab
Appendix S	Revised Survey Plan	Project Surveyors

Appendix T	Surveyor Letter	Project Surveyors
Appendix U	Revised Clause 4.6 Variation Request (FSR)	Urbis
Appendix V	Revised Clause 4.6 Variation Request (Height)	Urbis
Appendix W	Updated Affordable Housing Provider (Letter of Support)	Evolve Housing (TIB)
Appendix X	Revised BCA Report	SWP
Appendix Y	Revised Accessibility Report	ABE
Appendix Z	Fire Safety Letter	Affinity
Appendix AA	Revised ESD Report	Efficient Living
Appendix BB	Updated BASIX Certificate	Efficient Living
Appendix CC	Air Quality Impact Statement	Todoroski Air Sciences
Appendix DD	Revised Stormwater Management Plan	BG&E
Appendix EE	Flood Risk Assessment Cover Letter	BG&E
Appendix FF	Revised Infrastructure Delivery, Management and Staging Plan	Neuron
Appendix GG	Revised Remediation Action Plan (RAP)	Douglas Partners
Appendix HH	Revised Visual Impact Assessment (VIA)	Ethos Urban
Appendix II	Heritage Impact Statement Letter	Weir Phillips
Appendix JJ	Revised Archaeological Assessment	Artefact
Appendix KK	Crime Prevention Through Environmental Design (CPTED) Cover Letter and Social Impact Assessment Cover Letter	Urbis
Appendix LL	Proposed Off-Site Active Transport Works	TTPP
Appendix MM	Revised Construction Management Plan (CMP)	Decode
Appendix NN	Staging Strategy	Urbis
Appendix OO	Revised Embodied Emissions Materials Form	WT Partnership
Appendix PP	Master Schedule	Woods Bagot
Appendix QQ	Hydrogeological Statement	Douglas Partners
Appendix RR	Contamination and Site Conditions Letter	Douglas Partners
Appendix SS	Cumberland City Council Engagement	Cumberland Council
Appendix TT	Interim Site Auditor Advice	Geo-Logix
Appendix UU	TOA Response	Various

2

Part 1 – Response to Submissions

2 Part 1 – Response to Submissions

This part of the report includes information that relates to the Submissions Report (including responses to the agency advice/feedback and public submissions received following public exhibition of the SSDA. This section has been prepared in accordance with *State Significant Development Guidelines – Preparing a Submissions Report (Appendix C)* dated March 2024.

2.1 Analysis of Submissions

The SSDA was on public exhibition between Friday 7 February 2025 and Thursday 6 March 2025. The SSDA was also referred to other State government authorities, referral agencies, local Councils, and relevant utility service providers for review and comment.

A total of 12 submissions were received from DPHI, local Councils, NSW Government agencies and utility providers, including:

- City of Parramatta Council
- Cumberland City Council
- Department of Climate Change, Energy, the Environment and Water (**DCCEEW**), including:
 - Conservation Programs, Heritage and Regulation (**CPHR**) Group
 - Heritage NSW
 - Heritage Council of NSW
 - Water Group
- Department of Planning, Housing and Infrastructure (**DPHI**)
- Endeavour Energy
- Fire and Rescue NSW (**FRNSW**)
- Sydney Trains
- Sydney Water
- Transport for NSW (**TfNSW**)

The above submissions identified matters which required further assessment and/or provided recommended conditions of development consent (should the application be approved). The key issues raised in submissions included statutory compliance, the overall bulk and scale of the proposed development, the design of landscaping and open spaces, provision of car parking, traffic and access, contamination, tree removal, amenity, and infrastructure provision.

In addition, a post-lodgement meeting was held with the State Design Review Panel (SDRP) on 6 March 2025. DPHI requested that a response to matters raised by the SDRP within their summary and recommendations letter (dated 18 March 2025) is also to be incorporated within this report. Refer to **Section 2.2** for further details on post-lodgement engagement and actions taken since public exhibition of the SSDA.

The Heritage Council of NSW and NSW Fire and Rescue confirmed receipt of the SSDA referral and advised they did not have any further comments regarding the proposal. Cumberland City Council provided a detailed submission. Council's key concerns related to statutory compliance, the overall bulk and scale of the proposed development, the detailed design and landscaping of public spaces, car parking, traffic and access, contamination, stormwater management, local infrastructure provision and tree removal.

A total of four (4) submissions were received from members of the local community. These submissions primarily related to the potential impacts of the proposed development, particularly in relation to traffic, noise, pedestrian connectivity and the capacity of existing public infrastructure to service the proposed

development. Of these four (4) public submissions, two (2) commented on the proposal and two (2) objected to the proposal. All four (4) submitters were based locally within approximately 5 kilometres of the site (three based in Granville, and one based in Lidcombe).

In accordance with the *State Significant Development Guidelines – Preparing a Submissions Report* (Appendix C) dated March 2024, the key issues raised in the submissions have been categorised and are set out within **Table 3**. A Response to Submissions Summary Table is appended to this report at **Appendix A**.

2.1.1 Categorising Key Issues

In accordance with DPHI's *State Significant Development Guidelines*, the key issues raised in the submissions have been categorised as outlined in **Table 3**. For a detailed response to each of the submissions received, refer to the Submissions Register included at **Appendix A**.

Table 3 Categorising of Issues and Matters Raised

CATEGORY OF ISSUE	SUMMARY OF MATTERS RAISED
The Project	
<u>Siting and Location</u>	- The location of the proposal and its impacts on the alignment of the proposed Cumberland Rail Line (including how any potential conflicts would be managed). - Confirm extent of site boundary and whether SP2 zoned land is included.
<u>Land Uses</u>	- Ground floor uses of Building 4 (and whether this meets the definition of 'shop top housing'). - Clarify the use and function of the 'kiosk'.
<u>Architectural Design (including Bulk and Scale)</u>	- Architectural roof features to be removed, and façade treatment to be reconsidered to improve street level activation. - Reconsider the architectural treatment / façade design of the podium at its interface with Woodville Road and Crescent Street. - General concerns regarding overall bulk and scale (and above ground car parking contributing to bulk and scale).
<u>Landscaping and Open Spaces</u>	- Additional information requested regarding play equipment, furniture, fixtures, and construction details of parkland, plaza and streetscape areas, as well as the location of the vehicular access route for landscape maintenance. - Reconsider footpath levels for pedestrians accessing the retail / commercial premises and explore opportunities for improved pedestrian connectivity. - General concern regarding the extent of parklands and open space provided, relative to the scale of the proposed development. - Consider removal of the internal north-south road (Crescent Lane) or reduce its extent to improve relationship with public domain. - Confirm provision of communal open space.
<u>Traffic, Access and Loading</u>	- Amendments requested to vehicular access and loading bays. - Reconsider the design and length of the proposed Crescent Street Road widening.

Stormwater
Management,
Flooding and
Infrastructure

- Clarify encroachment into drainage easement and stormwater pipe/conduit, and OSD storage volumes.
- General concern regarding adverse impacts on local infrastructure.

Plan of Management

Plan of Management

- Plan of Management requested for traffic, parking management, cleaning of communal areas, and noise management.

Procedural Matters

Inconsistencies in
Documentation

- Additional labelling / information required on Architectural Plans (including plans showing layout of all floor levels), updated MUSIC model requested.
- Discrepancies in Aboriginal Cultural Heritage Assessment Report (ACHAR) to be updated.
- Landowner's consent to be provided for pedestrian bridge over A'Becketts Creek, and for any tree removal outside the site's boundary.
- Clarify whether new easements are proposed, and if existing easements are to be extinguished.
- Confirm estimated number of construction and operational jobs.

Statutory
Compliance

- Clarify permissibility of shop top housing, compliance with 30% height and FSR bonuses under the Housing SEPP 2021, and compliance with car parking controls.
- Confirm total GFA and compliance with maximum permissible FSR and height, update Clause 4.6 Variation Request(s).

Economic, Environmental and Social Impacts

Amenity (including
Visual Impacts, Wind,
Overshadowing,
Noise and Privacy)

- Avoid overshadowing to nearby heritage items and residential dwellings to the south and consider visual impact of above ground car parking.
- Reconsider building separation distances and confirm mitigation measures to address visual privacy and overlooking.
- Wind Impact Assessment to consider impacts to public and private open spaces and confirm mitigation measures (where required).
- Noise and Vibration Impact Assessment to consider staged construction of the development, and additional operational noise impacts.

Contamination

- Additional information requested regarding implementation of Long-Term Environmental Management Plan (**LTEMP**) and the 'cap and contain' strategy.
- Clarify preferred mitigation measures within the Remediation Action Plan (**RAP**).

Trees and
Biodiversity (**BDAR**)

- Additional information requested regarding flora / fauna surveys undertaken, methodologies outlined in the revised Biodiversity Development Assessment Report (**BDAR**), and impact minimisation.
- Inconsistencies between the BDAR and Arboricultural Impact Assessment (**AIA**).

	- Investigate potential opportunities for additional tree retention and confirm sufficient soil depths are to be provided. - Minimise impacts to Tree Protection Zones (TPZs) where possible, updated Tree Planting Plan and root mapping requested, and mitigation measures to be identified.
<u>Stormwater Management and Flooding</u>	- Additional information requested within Flood Risk Assessment. - Clarify maximum annual volume of water take due to aquifer interference activities, and demonstrate ability to acquire sufficient water entitlement
<u>Traffic, Access and Car Parking</u>	- General concerns regarding vehicular access to the site, as well as traffic generation / congestion, safety, vehicle queuing and intersection capacity. - Confirm car parking arrangements and overall calculation of car parking. - Further clarity requested regarding design of parking spaces, aisle widths, disabled car parking, and proximity of car parking to residential / commercial uses. - Additional information required on proposed shuttle bus service to Harris Park and Parramatta Stations (including set down locations), and whether this would be provided in perpetuity.
<u>Waste and Servicing</u>	Reconsider the location of waste storage areas and vehicle access for waste collection.
<u>Planning Agreement</u>	- To be prepared, negotiated and executed between Council and applicant prior to construction. - Confirm whether public access via internal road network would be dedicated to Council or secured by a right-of-way.

2.2 Action Taken Since Exhibition

In response to the key issues raised within the submissions, design refinements and clarifications have been made to the proposed development since public exhibition.

This section summarises the changes that have been made to the proposed development since public exhibition. It also outlines the additional assessment undertaken to respond to the concerns raised with the public agency, organisation and public submissions outlined in **Section 2**.

2.2.1 Further Engagement

Since the SSDA was publicly exhibited in early 2025, the Applicant has undertaken further consultation with the SDRP, DPHI and Cumberland City Council to discuss the matters raised within their relevant submissions.

The following table summarises the additional consultation that has been undertaken since public exhibition of the SSDA. The table below also summarises the outcome(s) of this engagement, and how the amended proposal has responded (where relevant).

Table 4 Summary of Further Engagement

STAKEHOLDER	FURTHER ENGAGEMENT	OUTCOME / PROJECT RESPONSE
State Design Review Panel (SDRP)	A meeting was held with the SDRP on 6 March 2025 to discuss design changes and amendments to the proposed development, as well as	While there have been improvements following SDRP no. 2, there were still concerns regarding the ground level interfaces resulting in poor CPTED outcomes, and that greater resolution and

the proposal's response to feedback received from the SDRP at meeting no. 2 (which was held in June 2024, prior to lodgement of the SSDA).

Representatives from GANSW, DPHI, Cumberland Council, Urbis (Planning), Woods Bagot, the applicant, and project managers attended this meeting.

Selected technical consultants also attended this meeting with the SDRP.

rationalisation of the streetscape, internal roads and multi storey carpark was required.

Key aspects of the design strategy that were supported and required to be maintained included:

- The intent to provide employment opportunity for Aboriginal Community through landscape planting /maintenance.
- The removal of the terrace housing fronting Crescent Street.
- The provision of ground floor residential access to all towers (and expressing this in built form), as well as the modulation of the tower massing to reduce the perceived bulk and scale.
- Commitment to co-locate uses near entrances and public areas to support 24 hour passive surveillance.
- Provision of a kiosk in the public domain.

A detailed response to all SDRP comments is included in the revised Design Report.

DPHI

An additional meeting was held with DPHI on **5 June 2025** to discuss design changes and amendments to the proposed development, and to seek feedback from DPHI on the overall direction of the proposed changes. Attendees from Urbis (Planning), Woods Bagot, the applicant, project managers and surveyor were also present at this meeting.

The provision of car parking, construction staging, and the calculation of site areas (as it relates to differing mapped FSR controls across the site) was also discussed.

In response to the written feedback received from DPHI (which incorporated the SDRP feedback above), the proposal's design has been amended to reduce overall massing, rationalise floor levels within the podium, improve connectivity and views through the site, and to refine the façade design. This was discussed with DPHI, and in-principal support was offered for these design directions.

In addition to design related matters, further matters were discussed with DPHI at a meeting on 5 June 2025 which have been considered within this report. These matters included:

- Justification of car parking provision.
- Project staging strategy (aligned to DPHI's expectations), and the staging of development contributions.

Cumberland City Council

A meeting was held with Cumberland Council on **12 March 2025** to discuss the proposed Letter of Offer and the long-term management requirements for the park. Attendees from Urbis (Planning) and the applicant were also present at this meeting.

A detailed package was issued to Council on 11 August 2025 for further discussion.

This package included the following:

- A response to design issues regarding the proposed pedestrian bridge (in order to obtain owners consent to lodge the SSDA for the bridge element) which is partly located across Council owned land.

An additional meeting was held with Cumberland City Council on **15 May 2025**. The purpose of this meeting was to discuss the approach for dedication of the park to Council as well as Council's requirements for long term remediation and monitoring. Representatives from Urbis (Planning), project managers and the applicant were also present. There has also been on-going communication by phone and email with Council's Director of Planning.

- Additional remediation solutions to address Council's concerns regarding accepting the dedication of contaminated land.
- Proposed off-site active transport initiatives as requested by Council.

Council provided email advice dated 19 September 2025 regarding the above issues, and this advice has been considered in the preparation of this report. Refer to Appendix SS.

2.2.2 Refinements and Amendments to the Project

The proposed refinements and amendments to the proposal respond to feedback received from DPHI and other key stakeholders during the public exhibition period. The proposal has also been amended in response to further engagement with DPHI, Cumberland City Council and the SDRP.

The key changes made to the proposed development since public exhibition of the SSDA include:

- A net reduction in car parking, and an increase in bicycle parking.
- A reduction in overall height, bulk and scale, including reduced building footprints.
- Increased provision of overall dwellings and affordable housing.
- Improved connectivity at the ground floor, and better alignment between the retail / commercial uses and the public domain.
- Enhanced street interfaces, more activated facades and refinements to materiality.
- Redistribution of floor space achieved through more efficient space planning and refined building layouts.
- Improved quality of communal open space (particularly for Stage B and Stage C).
- Increase in the overall provision of deep soil and tree canopy coverage.

These amendments extend beyond what can be considered 'minor refinements' capable of being described in a Submissions Report. As a result, an Amendment Report is also required to facilitate assessment of the amended proposal.

The amendments to the proposed development are set out within further detail in **Part 2** of this report (refer to **Section 3** below).

2.2.3 Additional Impact Assessments

Revised impact assessments have been prepared to respond to the matters raised within the submissions. The key matters identified for detailed assessment for the amended proposal include:

- Urban design and built form.
- Environmental amenity.
- Trees and landscaping.
- Traffic, transport and access.

- Noise and vibration.
- Contamination.

This has resulted in updates to the following key technical reports and plans:

- Revised Architectural Plans (**Appendix E**)
- Revised Design Report (**Appendix F**)
- Revised Landscape Plans and Design Report (**Appendix J**)
- Revised Arboricultural Impact Assessment (**Appendix K**)
- Revised Wind Impact Assessment (**Appendix O**)
- Revised Transport Impact Assessment (**Appendix P**)
- Revised Noise and Vibration Impact Assessment (**Appendix R**)
- Revised Remediation Action Plan (**Appendix GG**)

The full list of updated technical assessments and reports is provided within **Table 2**. The findings and recommendations of the additional assessments are discussed in more detail within **Section 4** of this report.

2.3 Response to Submissions

A detailed response to each of the matters raised within the submissions is set out within the Submissions Register (included at **Appendix A**). Further detailed discussion outlining the response to submissions is provided in the following part of the report. The following section of this report sets out the amended proposal, revised compliance with strategic and statutory planning frameworks, and the key issues for assessment.

Section 4 includes a comprehensive assessment of the amended proposal, including the updated impact assessment reports prepared by relevant specialist consultants to assess the proposed changes, as well as responding to the detailed issues raised within the submissions.

3

Part 2 – Amendment Report

3 Part 2 – Amendment Report

This section of the report describes the proposed amendments and provides a comparative analysis of the original development and amended proposal. It also includes an updated detailed description of the various components of the proposal, including the proposed amendments.

3.1 Amended Description of Development

The description of development has been updated to reflect the amendments to the proposed development as originally lodged. The amended proposal seeks consent for the following:

- Site establishment works, tree removal, site preparation, earthworks and excavation, services augmentation, and remediation works.
- Development of seven (7) residential buildings comprising four (4) shop top housing buildings and three (3) residential flat buildings, as outlined below:
 - Buildings 1-3 are integrated with an eastern mixed-use podium building, while Building 4 is situated above a mixed residential / commercial space, comprising shop-top housing.
 - Buildings 5-7 consist of residential flat buildings.
- Delivery of 15% of the total floor space as affordable housing (to be distributed across each of the seven (7) residential buildings or within a consolidated building proposed proportionately as buildings are developed).
- Approximately 134,206 m² total floor space comprising:
 - A total of 2,496 m² retail GFA and 2,710 m² commercial GFA.
 - 1,374 residential apartments (of which 220 are for affordable housing).
 - Communal amenity facilities for residents.
 - Building services areas.
- Activation of Crescent Street through a mix of amenity areas and pockets of open space.
- Shared car parking for Buildings 1-3 and the commercial and retail tenancies within the podium.
- Shared car parking for Buildings 4-7 on the lower ground levels and within the above ground parking structures adjoining Buildings 4-5 and 6-7.
- Landscaping and accompanying place-making works including:
 - Public open space, and hard and soft landscape works.
 - Ground and rooftop communal open space.
 - Publicly accessible through-site links.
 - At grade car parking for the park, forecourt and retail areas.
 - Vehicle access via a new internal publicly accessible road and vehicle accessway.
 - New pedestrian footpaths and access arrangements to the site.
 - Kiosk tenancy within park-side structure.
- Staged completion of a public park.
- Associated works involving the widening of Crescent Street and road upgrades to the intersection at Crescent Street and Woodville Road.

3.2 Summary of Proposed Amendments

The key amendments to the proposed development that have been made since public exhibition of the SSDA are summarised in the following table.

Table 5 Summary of Key Changes to Proposed Development

PROPOSED AMENDMENT	DESCRIPTION
Net reduction in car parking and more bicycle parking	There has been an overall net reduction in the provision of car parking on site. This includes a reduction in car parking provided for the residential apartments and commercial uses. The provision of bicycle parking spaces has increased to support active transport and to improve connections between the site and Harris Park train station. There has also been a minor increase in the provision of visitor car parking spaces (for the residential component).
Reduced height, bulk and scale	The height of Buildings 4, 5 and 6 has been reduced, and the height of the podiums has also been reduced. The overall footprint of all buildings has also been reduced by improving the efficiency of building layouts. Specifically, the architectural roof features have been removed from Building 5 (within Stage B) and Buildings 6-7 (within Stage C), and the number of car parking levels above ground has been reduced from seven levels to four levels within Stage B (Buildings 4-5) and Stage C (Buildings 6-7). These massing changes deliver a reduction in the perceived bulk and scale of the development and enhance the interface to Crescent Street. The massing and height changes also improve solar access to neighbouring properties to the south.
Improved ground floor connectivity	The ground floor retail and commercial levels (within Stages A and B) have been lowered slightly to better align with the adjacent site footpath levels of the park. This significantly enhances the interface between the retail / commercial uses and public domain and improves connectivity and pedestrian access.
Enhanced street interfaces, activated facades and materiality refinements	The reduction in podium height in Stage B (Buildings 4-5) and Stage C (Buildings 6-7), and the integrated landscape and architectural design response which includes subtle planting has significantly enhanced the interface with Crescent Street. The podium materiality has also been amended to incorporate perforated screens, modulated language that differs between buildings, and patina variation (alongside the removal of glass for the car parking facades). This creates a more attractive and visually engaging façade response to different frontages. The podium fronting Woodville Road has also been refined to incorporate masonry treatment and the potential for public art. Plant and services have been concealed behind angled screens, the ground level has been reduced to better align with the footpath levels, and landscape treatments have been enhanced. This achieves a balanced outcome between delivering an improved pedestrian interface along Woodville Road whilst acknowledging operational requirements. The amended design also delivers a softer, more engaging interface between the footpaths and elevated terraces through the provision of

layered landscaping, reduced courtyard wall heights and varied materiality and edge treatments (such as solid walls and open balustrades). This improves the interface and relationship between public and private domain, whilst balancing residential privacy with the adjacent public open space.

Floor space redistribution

Whilst there has been a minor reduction in floor space within the amended proposal, the provision of floor space has been redistributed across the scheme. This change includes a decrease in overall commercial floor space and a proportionate increase in residential floor space.

Enhanced residential amenity through efficient planning

The lift cores within Building 5 and Building 6 have been amended from dual cores to single cores to improve efficiency whilst maintaining articulation in the built form approach. Building layouts and floor plans have also been amended across the site to improve efficiency. This has resulted in an increase in the quantum of residential apartments (including affordable housing) whilst remaining GFA neutral.

The refined efficiencies and building layouts have resulted in improved residential amenity due to an increase in solar access and natural ventilation to the residential apartments (particularly for Building 2 and Building 6).

A total of 69% of apartments achieve at least two hours of solar access between 9am and 3pm (an increase of 4% from the original proposal), and a total of 73% of apartments are naturally ventilated (an increase of 16% from the original proposal).

The extensive redesign of the car parking layout (including the reduction of podium heights within Stages B and C) achieves a leaner and more efficient structure that enhances amenity, reduces visual impact, and strengthens the overall integration of the proposal with the public domain.

Increase in provision of affordable housing

The amended proposal includes the provision of an additional 19 affordable apartments compared to the original proposal. This overall increase in the on-site provision of affordable housing is due to the redistribution of floor space, and improvements to the floor planning and efficiency of the residential apartments.

Improved quality of communal open space

The communal open space within Stage B and Stage C has been amended to form a single contiguous area on the rooftop podiums which is clearer in its intent and more clearly defined. This has significantly improved the quality of communal open space and its connectivity for residents. These communal open spaces also achieve improved amenity through better access to sunlight as a result of the reduced building footprints, and an overall increase in the extent of contiguous open space provided on the podium rooftops.

Increase deep soil and tree canopy coverage

The proposal has been amended to provide a total of 11,476 m² of deep soil (which equates to 30.3% of the total site area) and 10,952 m² of tree canopy coverage (which equates to 28.9% of the total site area). This represents a 6.0% increase in the overall provision of deep soil and a 6.4% increase in overall tree canopy coverage compared to the original proposal.

The location of tree canopy coverage and shade has also been refined to ensure shade cover is provided with consideration of proposed uses. This significant enhances the quality and amenity of the public open space.

3.3 Comparative Analysis

In accordance with the DPHI *State Significant Guidelines*, a comparative analysis has been undertaken of the proposed development (as originally lodged in January 2025) and the amended proposal. The key amendments to the proposed development are summarised in the table below.

Table 6 Comparison of Proposed Development and Amended Development

COMPONENT	SSD PROPOSAL AS LODGED (JANUARY 2025)	AMENDED PROPOSAL (NOVEMBER 2025)	VARIANCE
Site Area	37,877 m ²	37,877 m ²	No change
Land Use	- Residential flat buildings - Shop top housing - Commercial premises - Retail premises	- Residential flat buildings - Shop top housing - Commercial premises - Retail premises	No change
Residential Apartments and Unit Mix	1,227 residential apartments, comprising: 1,026 market apartments 201 affordable apartments Apartment mix: 132 x 1-bedroom apartments (10.76%) 778 x 2-bedroom apartments (63.41%) 313 x 3-bedroom apartments (25.51%) 4 x 4-bedroom apartments (0.33%)	1,374 residential apartments, comprising: 1,154 market apartments 220 affordable apartments Apartment mix: 203 x 1-bedroom apartments (14.77%) 878 x 2-bedroom apartments (63.9%) 289 x 3-bedroom apartments (21.03%) 4 x 4-bedroom apartments (0.30%)	Change of +147 apartments, comprising: +128 market apartments +19 affordable apartments Apartment mix: +71 x 1-bedroom apartments (+4.01%) +100 x 2-bedroom apartments (+0.49%) -24 3-bedroom apartments (-4.48%) - No change 4-bedroom apartments (-0.03%)
Building Height	Building 1 – 124.80 metres (RL 135.90) Building 2 – 117.96 metres (RL 129.55) Building 3 – 87.55 metres (RL 98.92) Building 4 – 64.23 metres (RL 75.70)	Building 1 – 122.95 metres (RL 134.05) Building 2 – 119.11 metres (RL 130.70) Building 3 – 92.43 metres (RL 103.80) Building 4 – 64.23 metres (RL 75.70)	Building 1: -1.85m Building 2: +1.15m Building 3: +4.88m Building 4: no change

	Building 5 – 70.89 metres (RL 83.30)	<i>Building 5 – 66.49 metres (RL 78.90)</i>	Building 5: -4.4m
	Building 6 – 77.44 metres (RL 89.75)	<i>Building 6 – 74.19 metres (RL 86.50)</i>	Building 6: -3.25m
	Building 7 – 79.00 metres (RL 91.00)	<i>Building 7 – 75.80 metres (RL 87.80)</i>	Building 7: -3.2m
GFA	A total of 134,217 m² comprising: - Residential GFA of 126,717 m²: - Market apartments: 106,584 m² - Affordable apartments: 20,133 m² - Non-residential GFA of 7,500 m² including: - Commercial: 5,000 m² - Retail: 2,500 m²	A total of 134,206 m² comprising: - Residential GFA of 129,000 m²: - Market apartments: 108,797 m² - Affordable apartments: 20,203 m² - Non-residential GFA of 5,206 m² including: - Commercial: 2,710 m² - Retail: 2,496 m²	-11 m² - Residential GFA: +2,283 m²: - Market apartments: +2,213 m² - Affordable apartments: +70 m² - Non-residential GFA: -2,294 m² including: - Commercial: -2,290 m² - Retail: -4 m²
FSR	R4 zoned land (W1 FSR) – 4.06:1 MU1 zoned land (W5 FSR) – 5.15:1 TOTAL = 4.68:1 (site-wide FSR)	R4 zoned land (W1 FSR) – 4.09:1 MU1 zoned land (W5 FSR) – 5.13:1 TOTAL = 4.68:1 (site-wide FSR)	R4 zoned land (W1 FSR) – +0.03:1 MU1 zoned land (W5 FSR) – -0.02:1 TOTAL = no change (site-wide FSR)
Access and Roads	- Two vehicular access points from Crescent Street, which allow for: - Access to the at grade and above ground car parking for residential, commercial and retail uses - Access for loading and servicing - Provision of an internal access road, connected to the two	- Two vehicular access points from Crescent Street, which allow for: - Access to the at grade and above ground car parking for residential, commercial and retail uses - Access for loading and servicing - Provision of an internal access road, connected to the two	No change

	vehicular access points from Crescent Street	vehicular access points from Crescent Street	
	- Upgrades to the intersection of Woodville Road and Crescent Street - Pedestrian and cycle bridge connection to Holroyd Sportsground	- Upgrades to the intersection of Woodville Road and Crescent Street - Pedestrian and cycle bridge connection to Holroyd Sportsground	
Car Parking	A total of 1,616 car parking spaces provided above ground, including: 1,480 residential spaces: 1,277 market residential spaces 203 affordable residential spaces 15 visitor spaces (for residential) 71 commercial spaces 50 retail spaces 3 car wash bays	A total of 1,568 car parking spaces provided above ground, including: 1,450 residential spaces: 1,323 market residential spaces 127 affordable residential spaces 24 visitor spaces (for residential) 37 commercial spaces 50 retail spaces 5 car wash bays 2 car share spaces	A change of -48 car parking spaces provided above ground, including: -30 residential spaces +46 market residential spaces -76 affordable spaces +9 visitor spaces (or residential) -34 commercial spaces - No change +2 car wash bays +2 car share spaces
Bicycle Parking	714 bicycle parking spaces, including: 668 residential spaces (including 231 visitor spaces) 31 commercial spaces (including 6 visitor spaces) 15 retail spaces (including 2 visitor spaces)	872 bicycle parking spaces, including: 842 residential spaces (including 384 visitor spaces) 15 commercial spaces (including 3 visitor spaces) 15 retail spaces (including 2 visitor spaces)	+158 bicycle parking spaces, including: +174 residential spaces (including +153 visitor spaces) -16 commercial spaces (including -3 visitor spaces) - No change
Loading and Servicing	7 loading bays, including: 3 spaces for 12.5m Heavy Rigid Vehicles (HRV) 2 spaces for 8.8m Medium Rigid Vehicles (MRV)	7 loading bays, including: 3 spaces for 12.5m Heavy Rigid Vehicles (HRVs) 2 spaces for 8.8m Medium Rigid Vehicles (MRVs)	No change

	▪ 2 additional at grade spaces	▪ 2 additional at grade spaces	
Landscaping and Open Space	▪ Provision of 26,198 m² of public open space at the ground floor, comprising: ▪ Soft-landscaped open space, central park located within the site, framed by the internal access road and buildings ▪ Hard-landscaped open space including the internal footpaths and access roads ▪ Provision of 3,666 m² of private open space at the ground floor, comprising: ▪ Soft and hard-landscaped areas, private gardens and internal footpaths ▪ Tree canopy coverage to 8,513 m² (which equates to 22.5% of the total site area) ▪ A total of 11,271 m² of deep soil (which equates to 29.8% of the total site area)	▪ Provision of 23,066 m² of public open space at the ground floor, comprising: ▪ Soft-landscaped open space, central park located within the site, framed by the internal access road and buildings ▪ Hard-landscaped open space including the internal footpaths and access roads ▪ Provision of 9,343 m² of private open space at the ground floor, comprising: ▪ Soft and hard-landscaped areas, private gardens and internal footpaths ▪ Tree canopy coverage to 10,952 m² (which equates to 28.9% of the total site area) ▪ A total of 11,476 m² of deep soil (which equates to 30.3% of the total site area)	▪ Change of -3,132 m² of public open space at the ground floor, comprising: ▪ Soft-landscaped open space, central park located within the site, framed by the internal access road and buildings ▪ Hard-landscaped open space including the internal footpaths and access roads ▪ Change of +5,677 m² of private open space at the ground floor, comprising: ▪ Soft and hard-landscaped areas, private gardens and internal footpaths ▪ Tree canopy cover change of -2,439 m² (which equates to -6.4% of the total site area) ▪ A change of 205 m² of dep soil (which equates to 0.5% of the total site area)
Communal Open Space	▪ 26,198m²	▪ 22,051 m²	▪ 4,147m²
Tree Removal	▪ 166 trees to be removed	▪ 157 trees to be removed	▪ Change of 9 trees
Associated Works	▪ Demolition and early works, remediation of land, bulk earthworks and tree removal ▪ Extension and augmentation of	▪ Demolition and early works, remediation of land, bulk earthworks and tree removal ▪ Extension and augmentation of	▪ No change

	services and infrastructure	services and infrastructure	
Staging	Phase 1 – Buildings 1, 2 and 3	<i>Stage A</i> – Buildings 1, 2 and 3	No change
	Phase 2 – Buildings 4 and 5	<i>Stage B</i> – Buildings 4 and 5	
	Phase 3 – Buildings 6 and 7	<i>Stage C</i> – Buildings 6 and 7	
Community Housing Provider	Evolve Housing, a not-for-profit registered community housing provider	Evolve Housing	No change
EDC	\$1.2232 billion (excl. GST)	\$1.084 billion (excl. GST)	-\$139 million (excl. GST)
Jobs	Construction jobs – 482 FTE	Construction jobs – <i>366 FTE</i>	Construction jobs – -116 FTE
	Operational jobs – 375 FTE	Operational jobs – <i>301 FTE</i>	Operational jobs – -73 FTE

3.4 Detailed Description

3.4.1 Project Area

The amended proposal applies to the same site located at 1 Crescent Street, Holroyd which is legally described as Lot 700 in DP 1241836. The site has a total area of 37,877 m² comprising one (1) allotment which is irregular in shape.

Despite the site area and site boundary being consistent with the proposed development as originally lodged, the following figure provides more clarity regarding the extent of the site boundary. This figure shows the Cumberland LEP 2021 zoning boundaries, overlaid with the footprint of all buildings, open spaces and public domain.

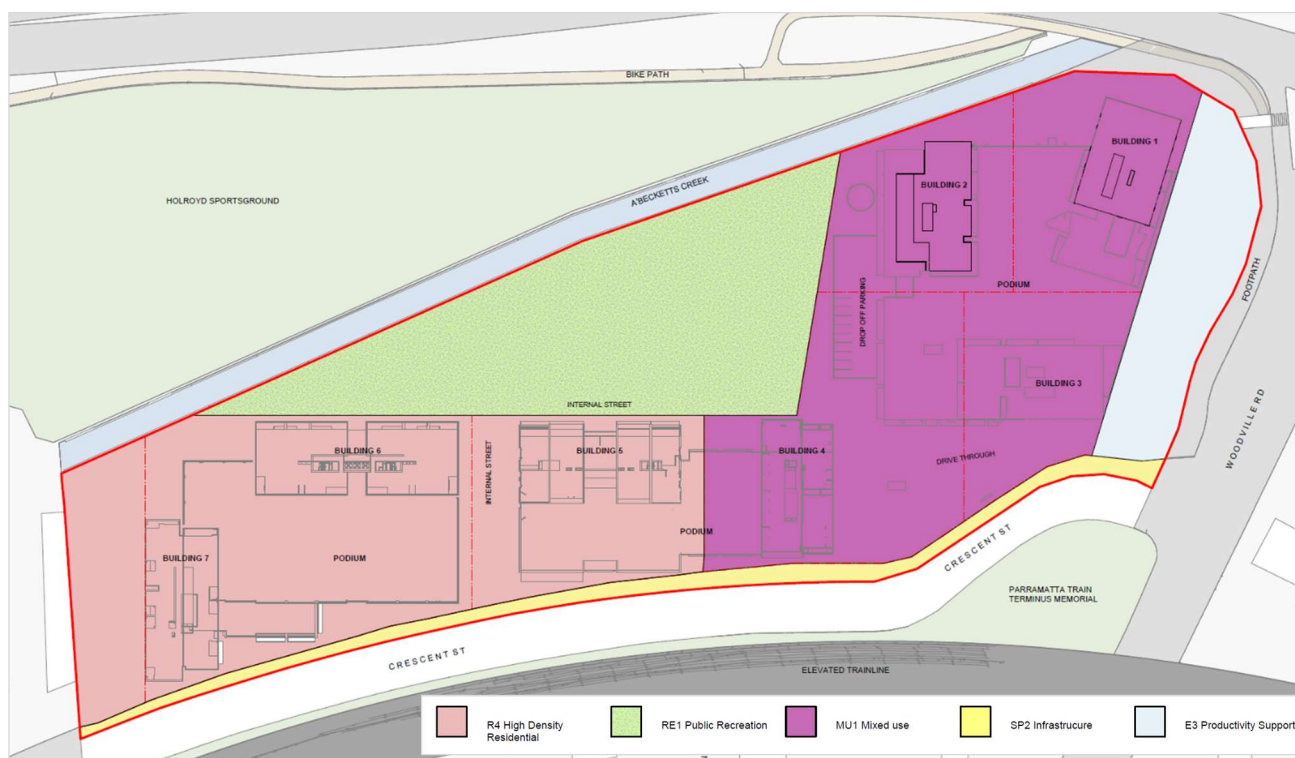
All buildings are to be located on land zoned R4 High Density Residential (within the western portion of the site) or on land zoned MUI Mixed Use (located within the eastern portion of the site). The public park is to be located on land zoned RE1 Public Recreation within the northern portion of the site adjacent to A'Becketts Creek.

The site boundary also includes the land zoned SP2 Infrastructure (Local Road) located along the southern boundary of the site. The proposal includes footpaths and landscaping located within the land zoned SP2 Infrastructure which are to be constructed in accordance with Council's design standards and dedicated to Council upon completion of the development.

The site also includes the land zoned E3 Productivity Support (within the eastern portion of the site). As noted in the Environmental Impact Statement (**EIS**) submitted with the original SSD, TfNSW issued a letter dated 26 June 2020 notifying the applicant of their intentions to create a Road Reservation to allow future planned upgrades to Woodville Road and the M4 Interchange.

TfNSW confirmed that it is appropriate for buildings to be built up to the future road reservation (noting the longer-term timeline for road corridor widening). While no formal reservation has been sought as yet, the eastern portion of the site is proposed to comprise landscaping works, pedestrian access and remediation works only.

Figure 2 Proposed Site Plan and Overlay of Cumberland LEP 2021 Zoning



Source: Woods Bagot (2025)

3.4.2 Development Staging and Early Works

Summary of Development Staging

The Crescent Parklands development is proposed to be delivered in three primary stages (A, B and C), with early enabling works undertaken prior to commencement. Each stage corresponds to a logical development cluster and will deliver all necessary remediation, infrastructure and public domain works to allow for independent operation

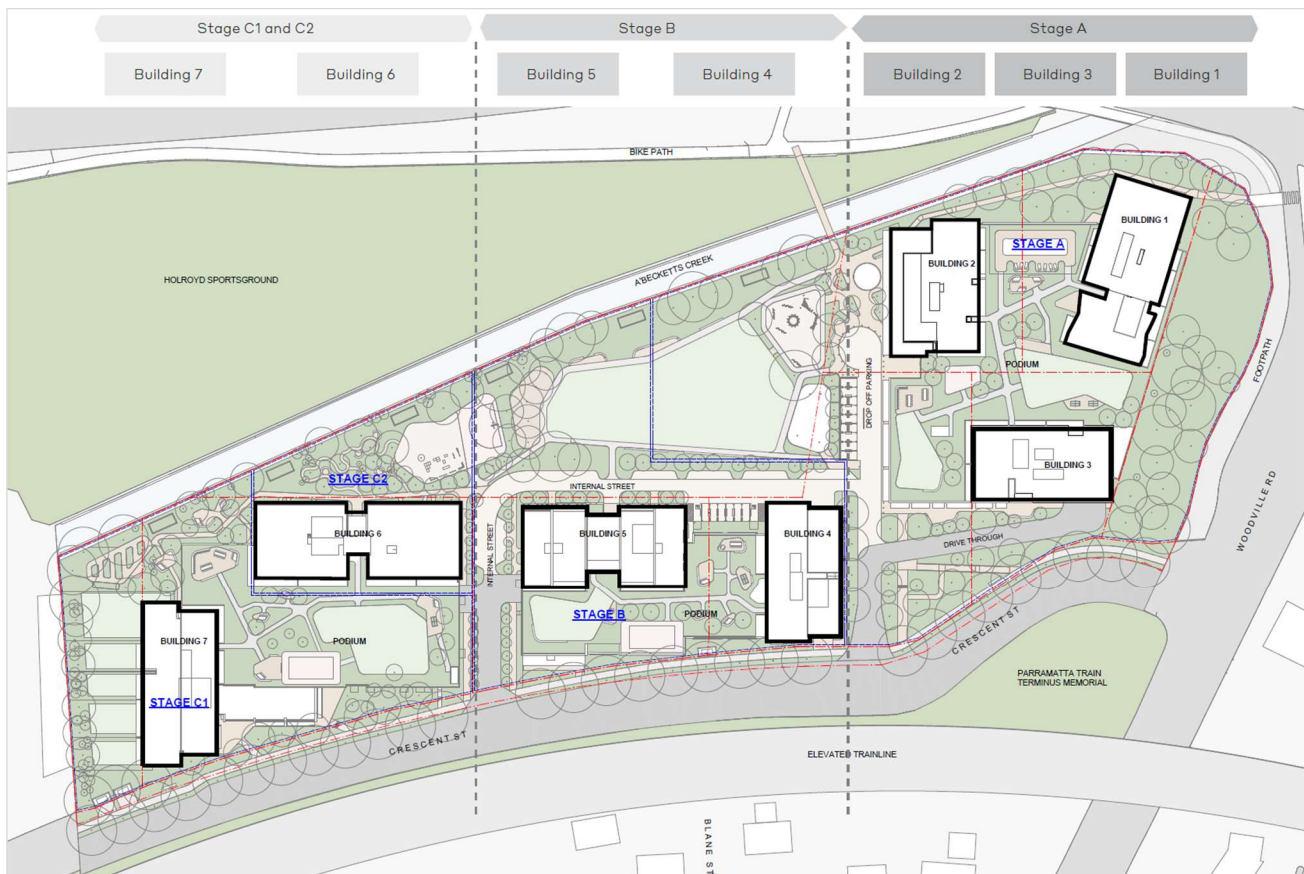
The indicative staging of development is summarised in the following table.

Table 7 Proposed Staging of Development

STAGING	LOCATION	INCLUSIONS
Stage A	East Precinct	- Buildings 1, 2 and 3 (including podium) - Road access, including part of the internal road - Part of the central area of open space - TfNSW easement - Crescent Street Road widening
Stage B	Central Precinct	- Buildings 4 and 5 (including podium) - Part of the internal road - Part of the central area of open space
Stage C	West Precinct	- Buildings 6 and 7 (including podium) - Landscaping, and part of the open space - Part of the internal road

The proposed staging of development is shown in the figure below.

Figure 3 Proposed Staging of Development



Source: Woods Bagot (2025)

Remediation works will be delivered progressively (aligned with the RAP) and tailored to the conditions of each stage or sub-stage (including asbestos management, landfill gas mitigation and validation). Each stage will also deliver essential services, access, landscaping, waste facilities and affordable housing proportionate to the floor space delivered, ensuring that no stage is reliant on the completion of another.

The staging framework also supports:

- **Flexible sequencing** of Stages A, B and C to respond to market and construction conditions.
- **Clear construction certificate and occupation certificate milestones** linked to the podium, tower and public domain works.
- **Staged contributions** with Section 7.11 and Housing and Productivity Contributions (**HPC**) payable pro-rata in line with delivery.
- **Infrastructure triggers** including Crescent Street road widening, tied to occupation of more than 50% of dwellings.

This approach ensures the proposed development remains feasible, coordinated and compliant, while enabling timely delivery of affordable housing and public domain benefits. Refer to the Staging Strategy included at **Appendix NN** for further details.

3.4.3 Physical Layout, Design and Built Form

The amended proposal refines the overall layout and design of the buildings across the site to improve pedestrian connectivity, site efficiency, and overall amenity.

Building footprints across the site have been reduced and refined to improve separation distance, and the height of most buildings have been reduced. These changes reduce the overall bulk and scale of the buildings, enhance solar access and natural ventilation, and allow for greater integration of landscaping across the site. As a result, the extent of overall deep soil and tree canopy coverage has increased within the proposed development (as amended).

Buildings 5, 6 and 7 have each reduced in height by approximately 3-4 metres, and the architectural roof features have been removed from Buildings 6 and 7. There is no change to the height of Building 4 as part of the amended proposal.

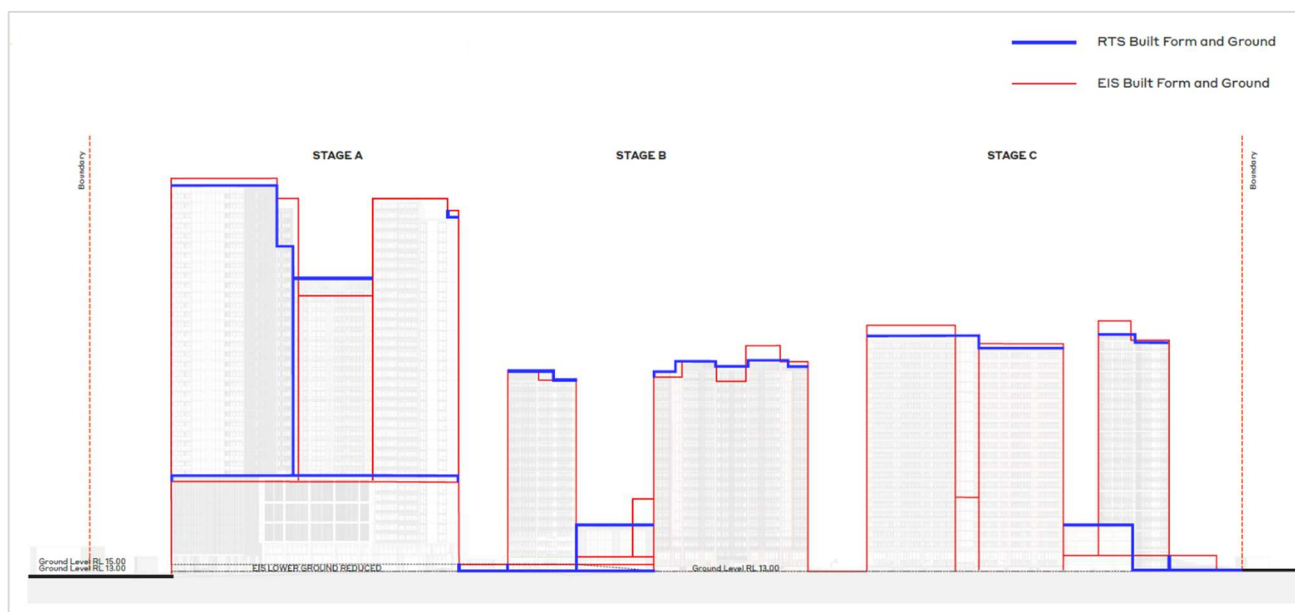
The height of Buildings 1 and 2 are largely consistent with the SSD proposal as originally lodged. The height of Building 1 has marginally reduced in height, while Building 2 has gained a single level due to an adjustment in the ground floor RL. Building 3 comprises a modest increase in height which sits comfortably within the height plane. This seeks to redistribute bulk away from the taller towers and strengthen the mid-rise profile of the precinct.

The height of the podiums within Stage B (Buildings 4-5) and Stage C (Buildings 6-7) has also been significantly reduced from 7-storeys down to 4-storeys and has been consolidated within each stage to allow for improved access to the podium rooftop gardens for residents. This reduces the overall visual impact of the podium, increases sunlight penetration to the site, and improves the pedestrian interface between the development and adjoining areas of open space.

As a result of the reduced podium heights, the layout of the car parking areas within the podiums have been rationalised to improve efficiency. The revised car parking layouts create additional space for communal open space on the rooftop of Stages B and C while reducing the perceived bulk and scale of the podiums. The amended car park layouts also improve vehicular circulation and wayfinding and provide a clearer separation between residential, retail, and commercial parking areas.

The proposed amendments to built form, height and massing are shown in the following figure.

Figure 4 Proposed Amendments to Built Form, Height and Massing (North Elevation)



Source: Woods Bagot (2025)

The ground floor level has been reduced to a consistent datum of RL 13.00 across the site to improve pedestrian connectivity, remove the need for ramps, and to create a more legible and accessible environment. This significantly improves the relationship between the public park and ground floor retail / commercial entries fronting the park.

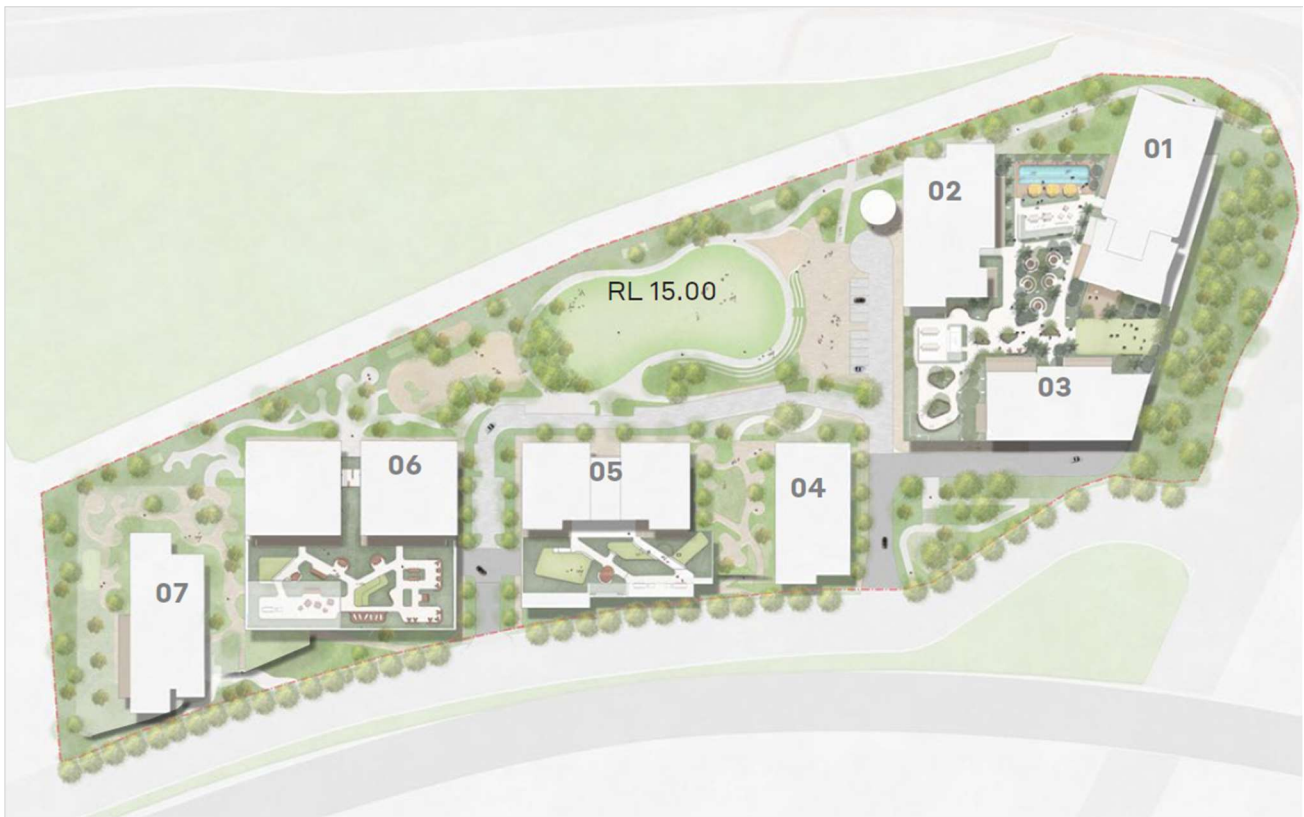
Vehicle circulation across the precinct remains consistent with the original SSD submission, with the internal road network designed to balance access, efficiency and safety. Two-way traffic is maintained from Crescent Street into the podium parking areas (which are accessible from the eastern driveway and western driveway), with the internal road around Buildings 4 and 5 supporting convenient access to retail and commercial tenancies.

While the overall structure is similar to the previous scheme, refinements have been made to rationalise parking and loading arrangements, ensuring a clear separation between short-stay parking bays, potential loading zones and bus stop provision. These clarifications strengthen the legibility of the amended proposal and confirm that the design continues to support the safe and efficient movement of vehicles, service vehicles and pedestrians throughout the precinct.

Overall, these amendments to the layout, design and built form ensure that the overall built form is consistent with the original SSD design intent, while improving the proposal's relationship to the ground plane, as well as improving the overall amenity and relationship of the amended proposal to the surrounding context.

A comparison of the original SSD site layout and the proposed site layout (as amended) is shown in the following figures. Indicative photomontages of the amended proposal are also shown below.

Figure 5 Original SSD Site Layout



Source: Woods Bagot (2025)

Figure 6 Site Layout of Amended Proposal



Source: Woods Bagot (2025)

Figure 7 Indicative Perspective of Amended Proposal (Viewed from the South)



Source: Woods Bagot (2025)

Figure 8 Indicative Perspective of Amended Proposal (Viewed from the North)



Source: Woods Bagot (2025)

3.4.3.1 Gross Floor Area

The proposed development (as amended) comprises a total of 134,206 m² of GFA. The site is subject to two separately mapped FSR controls under the Cumberland LEP 2021. The land zoned MUI Mixed Use (comprising Buildings 1, 2, 3 and 4) has a total site of 16,267 m² and is subject to a mapped FSR of 3.75:1 under the Cumberland LEP 2021. The land zoned R4 High Density Residential (comprising Buildings 5, 6 and 7) has a total site area of 12,406 m² and is subject to a mapped FSR of 3.4:1.

The proposed development (as amended) seeks to incorporate an additional 30% FSR in accordance with the infill affordable housing incentives (subject to providing 15% affordable housing).

Based on the total site area of 28,673 m² (within the mapped FSR areas under the Cumberland LEP 2021), the amended proposal results in a total FSR of 5.13:1 for the land zoned MUI Mixed Use and a total FSR of 4.09:1 for the land zoned R4 High Density Residential. Overall, this equates to a total site-wide FSR of 4.68:1.

Refer to the table below for a detailed breakdown of GFA by development stage and land use. Refer to the Submissions Register included at **Appendix A** for more details on the calculation of FSR, and the Clause 4.6 Variation Request (FSR) for details on the extent of variation sought to the mapped FSR controls.

Table 8 Proposed GFA by Land Use

LOCATION	ZONING	GFA BY LAND USE	TOTAL GFA
Stage A			
Podium	MUI Mixed Use	<i>Retail – 2,496 m²</i> <i>Commercial – 2,505 m²</i>	5,001 m ²
Building 1	MUI Mixed Use	<i>Shop top housing – 26,399 m²</i>	26,399 m ²
Building 2	MUI Mixed Use	<i>Shop top housing – 26,230 m²</i>	26,230 m ²
Building 3	MUI Mixed Use	<i>Shop top housing – 14,287 m²</i>	14,287 m ²
Stage B			
Building 4	MUI Mixed Use	<i>Commercial – 205 m²</i> <i>Shop top housing – 11,321 m²</i>	11,526 m ²
Building 5	R4 High Density Residential	<i>Residential – 14,594 m²</i>	14,594 m ²
Stage C			
Building 6	R4 High Density Residential	<i>Residential – 19,593 m²</i>	19,593 m ²
Building 7	R4 High Density Residential	<i>Residential – 16,576 m²</i>	16,576 m ²
OVERALL			134,206 m²

3.4.3.2 Transport and Car Parking

The amended proposal comprises a total of 1,568 car parking spaces (which includes 5 car wash bays and 2 car share spaces). This achieves an overall net reduction in the provision of car parking on site compared to the original proposal, primarily due to a decrease in car parking spaces for the residential and commercial uses.

The provision of car parking per stage as part of the amended proposal is summarised in the table below.

Table 9 Proposed Amended Provision of Car Parking

LAND USE	STAGE A	STAGE B	STAGE C	OVERALL
Residential (Market)	697 spaces	250 spaces	375 spaces	1,322 spaces
Residential (Affordable)	69 spaces	25 spaces	34 spaces	128 spaces
Visitors	15 spaces	4 spaces	5 spaces	24 spaces
Car Wash Bay	3 spaces	1 space	1 space	5 spaces
Commercial	34 spaces	3 spaces	-	37 spaces
Retail	50 spaces	-	-	50 spaces
Car Share	1 space	1 space	-	2 spaces
TOTAL	869 spaces	284 spaces	415 spaces	1,568 spaces

3.4.3.3 Future Subdivision

As part of the original SSD, details were provided regarding the indicative subdivision strategy across the site to demonstrate how the site may ultimately be subdivided and managed.

However, there are no amendments to existing easements or subdivision plans proposed as part of this SSD. Should this SSD be approved, the applicant would welcome a condition of consent requiring the following:

- Any existing easements, covenants or restrictions affected by the new development are to be released or varied prior to the issue of any Occupation Certificate.
- A separate application must be made to Council or a Registered Strata Certifier to obtain approval of the Strata Plan and issue of a Strata Certificate under the *Strata Schemes Development Act 2015*.
- The creation of any easements or documentary Positive Covenants registered on Title are to be created prior to the issue of an Occupation Certificate.

3.5 Strategic Context

This section describes the way in which the amended proposal addresses the strategic planning policies relevant to the site. It identifies the key strategic issues relevant to the assessment and evaluation of the proposed development.

The amended proposal is aligned with the State, district and local strategic plans and policies that are applicable to the site as outlined below.

3.5.1 National Housing Accord

The National Housing Accord (**the Accord**), released by the Federal Government in mid-2024, included targets to deliver 1.2 million well-located homes over the next five years. A component of this target is delivery of an additional 20,000 affordable homes:

- 10,000 driven by a \$350 million Commonwealth financial commitment, and
- 10,000 across the State and territory governments.

This is to tackle the current Australian housing shortage and an affordability crisis developing across Australia, enveloping New South Wales, the Greater Sydney Region and the Cumberland LGA.

The NSW Government have committed to delivering, as part of the Accord, 377,000 new homes across the State (known as Housing 2041). To achieve this target, the NSW Government have established LGA specific targets. For Cumberland, it is expected that 12,200 new homes be delivered in the next 5 years.

The proposal seeks to provide 1,374 apartments, of which 220 will be affordable housing managed by a CHP. Upon delivery, the proposal will assist in providing 10% of the homes Council is required to deliver under the Accord.

3.5.2 Greater Sydney Region Plan: A Metropolis of Three Cities

The Greater Sydney Region Plan provides the overarching strategic plan for growth and change in Sydney. It is a 20-year plan with a 40-year vision that seeks to transform Greater Sydney into a metropolis of three cities – the Western Parkland City, Central River City and Eastern Harbour City. It identifies key challenges facing Sydney including increasing the population to eight million by 2056, 817,000 new jobs and a requirement of 725,000 new homes by 2036.

The proposal will drive economic and housing options, establishing 1 Crescent Street as a viable, well-connected part of Greater Parramatta and Greater Sydney.

The proposal will help connect residents to future employment opportunities through the delivery of high-density living within proximity to established transport options including Merrylands, Parramatta, Granville and Harris Park train stations as well as bus routes along Woodville Road and Parramatta Road. The site is also within walking distance of Parramatta CBD and Merrylands Town Centre, contributing to the vision of the 30-minute city. Improved connectivity to the greater region will also be facilitated by a shuttle bus service proposed by the applicant. The proposal seeks to deliver high-quality public open space which will increase the liveability of the site and surrounding areas and foster healthy, socially connected communities.

- *Objective 10: Greater housing supply*

The proposed redevelopment of the site (including 30% uplift) unlocks its potential to deliver a mixed-use residential development which will contribute 1,227 dwellings. This considerable residential dwelling yield would materially contribute to the dwelling supply targets for the district and effectively support the population growth earmarked for the region.

- *Objective 11: Housing is more diverse and affordable*

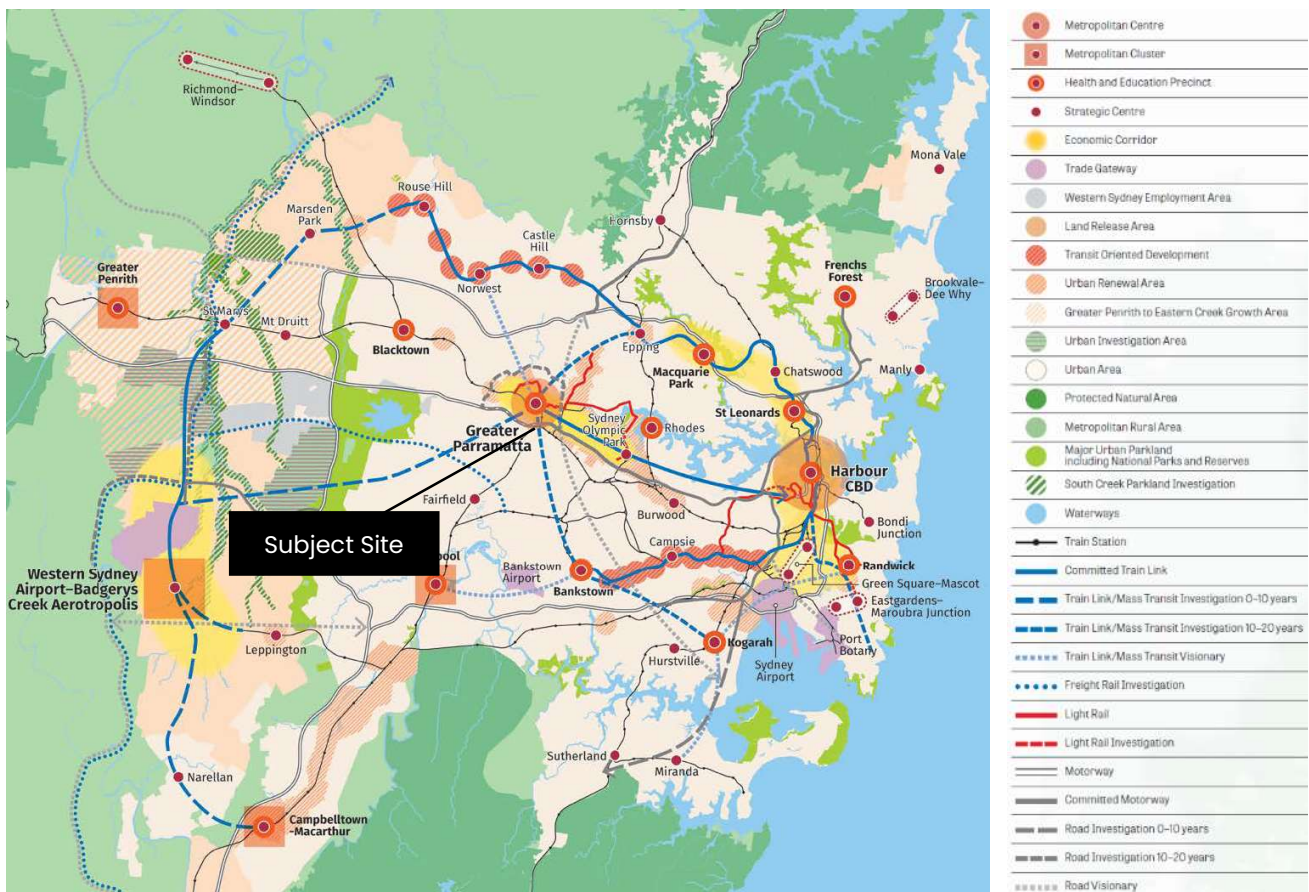
The use of 15% of the total floor space for affordable housing is a key driver for this project. The proposal will greatly help in delivering diverse and affordable housing in a highly accessible location.

- **Objective 14: A Metropolis of Three Cities – integrated land use and transport creates walkable and 30-minute cities**

The proposed development provides residential uses in an accessible location that is connected to public transport, employment, and services, contributing to a 30-minute city.

The proposal aims to deliver critical housing supply that is co-located to retail and commercial offerings at the ground floor podium level, and adjacent to public open space. The proposal seeks to redevelop the site to deliver a vibrant and thriving mixed-use precinct positioned in a strategic location in proximity to key centres and transport corridors.

Figure 9 Greater Sydney Region Plan – Structure Plan for the Metropolis of Three Cities



Source: Greater Sydney Region Plan (2018)

3.5.3 Our Greater Sydney 2056: Central City District Plan

The Central District Plan is a 20-year plan to manage growth in the context of economic, social and environmental matters to implement the objectives of the Greater Sydney Region Plan. The intent of the District Plan is to inform local strategic planning statements and local environmental plans, guiding the planning and support for growth and change across the district.

The site is located within the Greater Parramatta and Olympic Park (GPOP) Peninsula, as a key support site of the Parramatta CBD as outlined in the District Plan. The site is highly connected to existing public transport infrastructure with bus stops along Parramatta Road and Woodville Road within walking distance as well as multiple train stations including Harris Park and Granville.

The development will deliver an employment outcome for this precinct by accommodating a large increase in potential full time and construction job generation for the site, as well as indirect employment (cleaning and maintenance etc) contributing to the economy of the Greater Parramatta Area. The proposal gives the provision of 1,357 new dwellings within the Cumberland LGA, and the western Sydney region, which provides

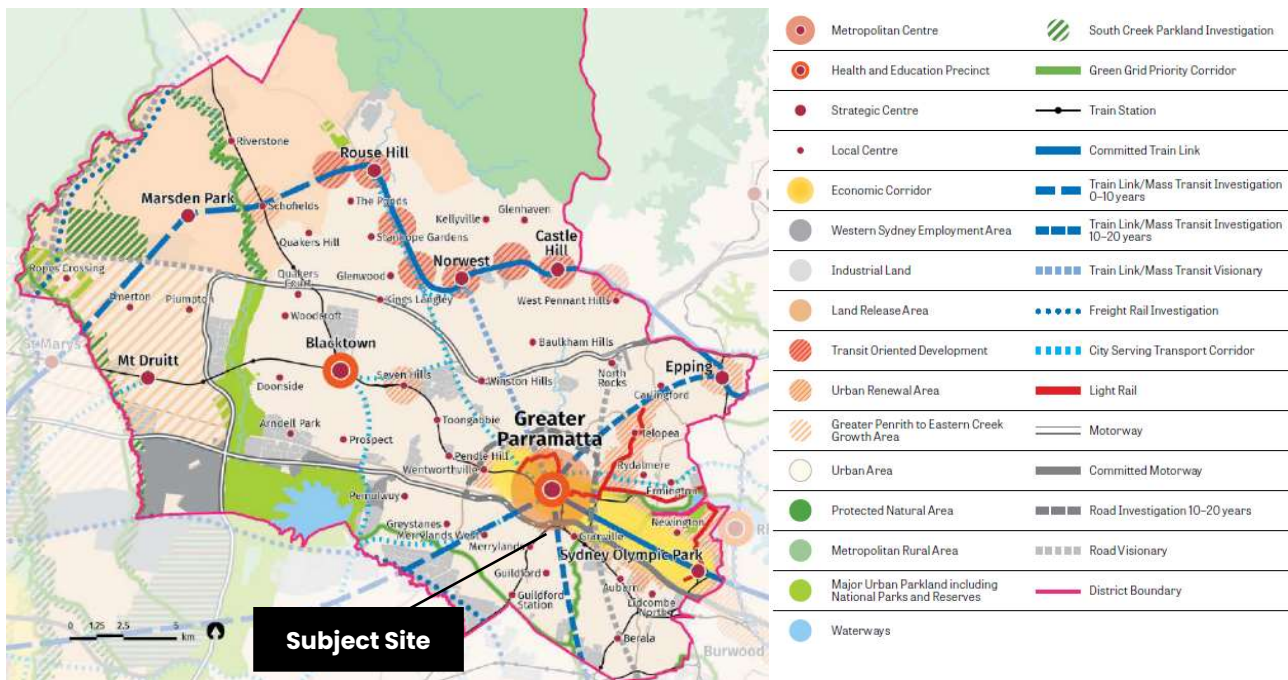
more housing for people to live and work within proximity of a key strategic centre. Furthermore, the proposal will deliver 15% of the total floor space as affordable housing.

The amended proposal will deliver a central park (7,414 m² in area), to be dedicated to the Council plus other publicly accessible open spaces as detailed in the revised Landscape Plans (**Appendix J**). The proposed Public Recreation land presents a significant opportunity for connectivity of the site, with the adjoining REI land within the Holroyd Sportsgrounds.

The proposal is consistent with the following key priorities and objectives established in the Central City District Plan:

- *Planning Priority C5 Providing housing supply, choice and affordability with access to jobs, services and public transport*
- *Planning Priority C9 Delivering integrated land use and transport planning and a 30-minute city*
- *Planning Priority C7 Growing a stronger and more competitive Greater Parramatta*
- *Planning Priority C8 Delivering a more connected and competitive GPOP economic corridor*
- *Planning Priority C17 Delivering high quality open space*

Figure 10 Central City District Plan Structure Plan



Source: Greater Sydney Region Plan (2018)

3.5.4 Cumberland 2030: Local Strategic Planning Statement

The Cumberland 2030: Local Strategic Planning Statement (**LSPS**) (published in March 2020) identifies the economic, social and environmental land use needs for Cumberland over the next 20 years. It demonstrates how Council's vision aligns with and gives effect to actions of the Greater Sydney Region Plan and the Central City District Plan.

The proposal aligns with and implements key LSPS planning priorities outlined for Granville Ward, including the following:

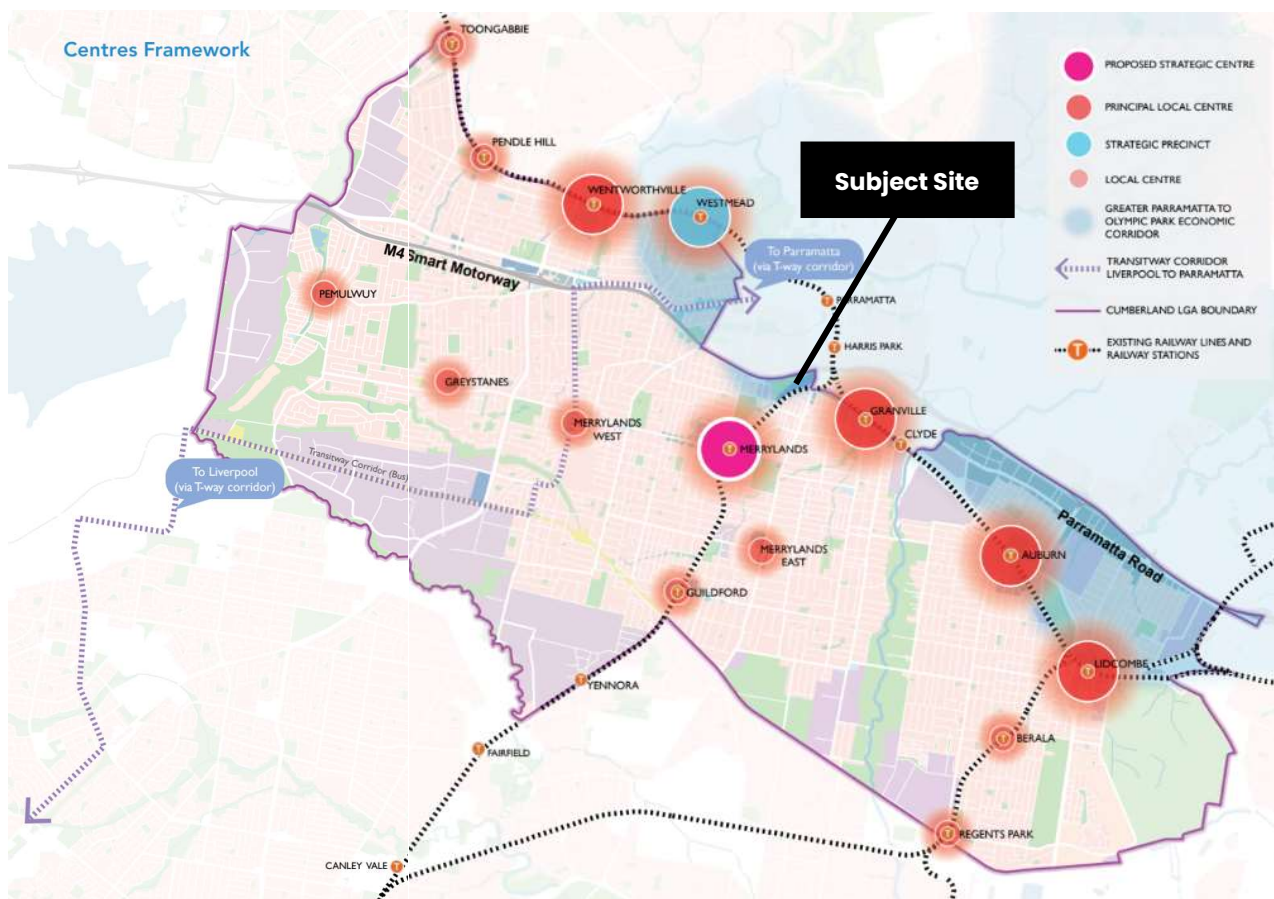
- Providing an opportunity for development along the Parramatta Road and Woodville Road Corridor to capitalise on proximity to Parramatta CBD.

- Improving access to key community, sporting, and open space areas by delivering public open space as part of the proposal.
- Delivering housing and job choices for a growing population in the Granville Ward area.
- Contributing 30% of the projected 4,200 additional dwellings for Merrylands, the closest strategic centre.
- Provide significant open spaces to support social connections in Granville Ward through place-based planning.
- Provides services and facilities to meet the needs of the broader local community.

The LSPS identifies proximity to the GPOP area, in which the site is located, as requiring delivery of housing and worker accommodation to ensure the Cumberland community benefit from the employment benefits of the GPOP. The proposal will achieve delivery of 1,374 new dwellings proximate to transport options, such as Harris Park Station, supporting employment opportunities within the GPOP area. Further 220 affordable housing dwellings proposed to support essential workers who need ease-of-access to precincts such as Westmead.

Woodville Road has also been identified as a key road corridor within the LSPS. The Woodville Road Strategy focuses on renewal opportunities to improve the corridor's amenities and guidance to future development and growth of nearby centres. The corridor has the potential to support job generation and housing growth that aligns with essential vehicular, freight and delivery activities. The proposal will assist with realising this vision, providing housing, retail and commercial uses to support amenity along this corridor.

Figure 11 Cumberland 2030 LSPS Structure Plan



Source: Cumberland Council (2020)

3.5.5 Cumberland Local Housing Strategy

The Cumberland Local Housing Strategy 2020 (**LHS**) details the key priorities and objectives for the future planning and delivery of housing within the LGA. It also guides residential development to meet housing priorities contained within the District Plan. The LHS vision places a focus on delivering opportunities for housing growth in planned centres and corridors. Housing diversity and affordability are critical, alongside the protection of the existing character and amenity of the established residential areas.

The proposal is in a strategic location that can leverage its proximity to strategic and local centres, transit corridors and other associated social, commercial, and community offerings. Similarly, it can provide critical medium-high density residential development in a prime location that will connect people to jobs, public transport, commercial uses and open space to meet their daily needs.

The role of the local centres is to:

- Meet the criteria for 30-minute access to a Strategic Centre, with access to a high frequency railway station; and
- Provides services and facilities to meet the needs of the broader local community.

The proposal will positively deliver on these priorities and ensure existing and future residents have access to a vibrant, socially connected community with their commercial, retail and open space needs provided for.

The projected housing demand scenario in Cumberland is detailed in the LHS. The proposal is captured in the GOP area and is proximate to the Granville and Harris Park centres. Of the priorities identified, the following are most pertinent to the proposal:

- *Priority 1: Delivering housing diversity to suit changing community needs*

The proposal offers a range of 1, 2 and 3 bedroom apartments across the buildings to cater to the different demographics in the Holroyd area, such as singles, families, the elderly, and people with disabilities.

- *Priority 2: Promoting transit-oriented housing options to support the 30 Minute city*

The proposal is within 743m of Harris Park train station, allowing residents to reach key destinations within 30 minutes. The mixed-use nature of proposal, with full-line supermarket retail offerings, will minimise the need to travel for residents and surrounding community and support the local Holroyd economy.

The proposal will provide 1,374 apartments, contributing significantly towards meeting the housing demands of the projected population growth in Holroyd. The proposal will facilitate a development that contains housing options that have been designed based on the expected resident needs and to support place making for the surrounding community.

3.5.6 Woodville Road Corridor Planning Proposal

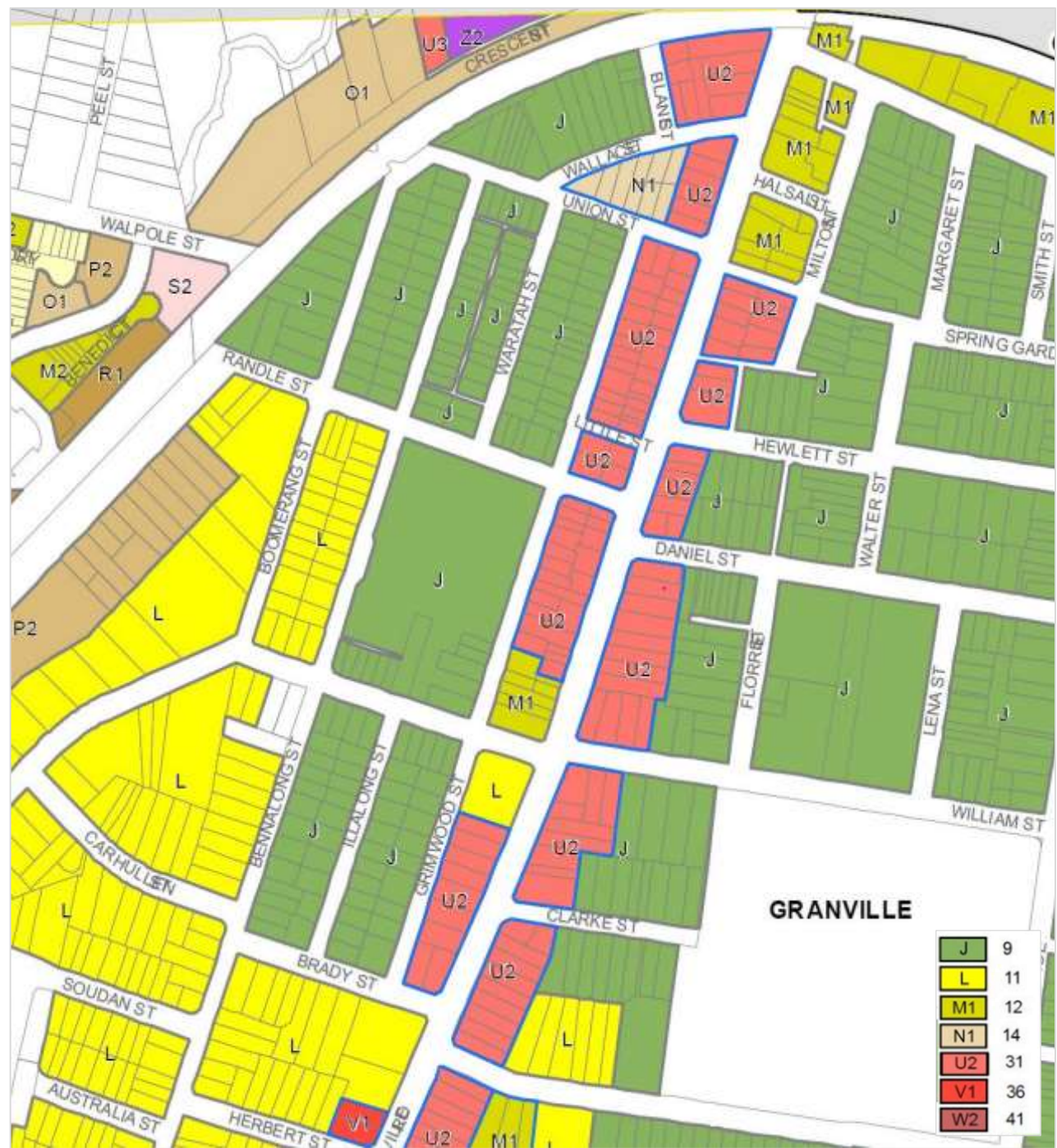
The Woodville Road Corridor Planning Proposal (**PP-2024-873**) is a Council-led planning proposal which aims to transform the Woodville Road area into a vibrant, mixed-use urban corridor (refer to the figure below). Key elements of the proposal include:

- **Zoning Changes** – Introduction of medium- and high-density residential and mixed-use zoning to facilitate the development of apartment buildings and commercial spaces.
- **Density Increases** – Plans to accommodate more residents through increased building heights and floor space ratios.
- **Public Spaces** – Enhancements to public spaces and infrastructure to improve liveability and community amenities.
- **Connectivity** – Improved transport links and connectivity within the corridor.

PP-2024-873 was recently finalised in September 2025. This initiative is part of Cumberland City Council's broader strategy to manage future population growth and enhance the quality of life for residents.

The proposal (as amended) will assist drive the emerging density, activation, housing provision and connectivity along Woodville Road sought by Cumberland Council under PP-2024-873.

Figure 12 Draft Woodville Road Corridor Planning Framework



Source: Cumberland City Council (2025)

3.6 Justification Summary

The amended proposal is considered to be aligned with the overall strategic context for these reasons:

- The amended proposal is aligned with the relevant State and local strategic planning policies as it will provide a significant quantum of residential accommodation, both market and affordable, retail and commercial floor space, as well as a new park area to support these uses.
- The amended proposal has considered the key site characteristics through a detailed analysis of the relevant constraints. The proposal considers the site contamination and incorporates remediation strategies and a long-term management plan to make the site suitable for the mixed-use precinct.
- The amended proposal has considered the wider locality including surrounding infrastructure, public transport and the cumulative impacts of other projects in accordance with DPHI's Cumulative Impact Assessment Guidelines for State Significant Projects. The amended proposal is the most significant development application in the immediate context and can be supported by the road and public transport infrastructure. Services infrastructure upgrades to facilitate delivery of this mixed-use precinct will be delivered as part of the proposed development.

3.7 Statutory Context

This section of the report provides an overview of the key statutory requirements relevant to the site and the amended proposal.

3.7.1 Power to Grant Approval

The legal pathway under which the consent is sought is described in the EIS submission Section 4.1.1 (page 76) and is not amended by this report.

3.7.2 Permissibility

The permissibility of proposed development is outlined in the following table.

Table 10 Permissibility

Matter	Consideration
<u>Land Use Zone(s)</u>	▪ MU1 Mixed Use ▪ R4 High Density Residential ▪ SP2 Infrastructure (Local Road) ▪ RE1 Public Recreation
<u>Land Uses</u>	The following land uses are proposed in the following zones: ▪ <u>MU1 Mixed Use</u> – Shop top housing, Retail premises, Commercial premises ▪ <u>R4 High Density Residential</u> – Residential flat building
<u>Permissibility</u>	The above land uses are permitted with development consent within the respective zones.

3.7.3 Other Approvals

An assessment of other approvals required to carry out the proposed development (as amended) are documented in Section 4.13 (page 77) of the Environmental Impact Statement submitted with the original SSD (dated January 2025).

3.7.4 Pre-Conditions

The following table outlines the pre-conditions to exercising the power to grant approval which are relevant to the amended proposal and the section where these matters are addressed within the EIS.

Table 11 Pre-Conditions

PRE-CONDITIONS	RELEVANCE	SECTION OF RTS REPORT
Resilience and Hazards SEPP		
<i>Section 4.6 – A consent authority must be satisfied that the land is suitable in its contaminated state – or will be suitable, after remediation – for the purpose for which the development is proposed to be carried out. Section 4.6 of the SEPP provides a State-wide approach to the remediation of contaminated land. It requires a consent authority to assess the potential for land to be contaminated and the works required to remediate the land to ensure it is suitable for its intended use.</i>	A Preliminary Site Investigation (PSI) was submitted with the original SSD to understand whether the previous or current land use activities associated with the operations at the site require further assessment and/or remediation in accordance with the contaminated land planning guidelines. The results of the PSI determined a Detailed Site Investigation (DSI) is required and a RAP may be required to progress the development of the site. The DSI, RAP and LTEMP were provided at Appendix BB, Appendix CC and Appendix DD of the original SSD. The RAP has been revised as part of the preparation of this report and is included at Appendix GG. The findings suggest that the most suitable remediation strategy is cap and contain, which would reduce excavation to footing preparations, landscaping and piling only. Full excavation of basements would be cost-prohibitive to the project proceeding.	Section 4.1.6 Revised RAP (Appendix GG)
Transport and Infrastructure SEPP		
<i>Section 2.98 – A consent authority must take into consideration any response from the rail authority for the rail corridor received within 21 days after the notice is given.</i>	The site is adjacent to a rail corridor. Therefore, the SSDA will be referred to the relevant rail authority.	N/A
<i>Section 2.100 – For development adjacent to a rail corridor:</i> <i>The consent authority must take into consideration any guidelines issued by the Planning Secretary.</i>	The revised Noise and Vibration Impact Assessment (NVIA) takes into consideration the relevant guidelines issued by the Planning Secretary and considers the noise impacts from the proximate railway corridor, proposing mitigation measures that have been integrated into the amended proposal.	Section 4.1.5 Revised NVIA (Appendix R)

If the proposal includes residential accommodation, the consent authority must consider that noise impacts have been appropriately managed.

Section 2.119 – Development with a frontage to a classified road requires the consent authority to be satisfied the matters listed in clause 101 have been addressed.

Section 2.120 – For development adjacent suitably trafficked road:

The consent authority must take into consideration any guidelines issued by the Planning Secretary.

If the proposal includes residential accommodation, the consent authority must consider that noise impacts have been appropriately managed.

Section 2.122 – Traffic generating development. A public authority, or person acting on behalf of a public authority, must not approve traffic-generating development without written notice of the intention to carry out the development to TfNSW in relation to the development, and taken into consideration any response to the notice that is received from TfNSW within 21 days after the notice is given.

Housing SEPP

Section 20 Design Requirements

(3) Development consent must not be granted to development under this division unless the consent authority has considered whether the design of the

The site is adjacent to Woodville Road which is a classified road. The amended proposal is practicable and safe for vehicle ingress and egress as documented within the revised Transport Impact Assessment. Following assessment against SIDRA and Aimsun modelling, the amended proposal will have an acceptable impact on the operability of the Crescent Street / Woodville Road intersection provided the infrastructure upgrades are implemented appropriately.

The revised NVIA takes into consideration the relevant guidelines issued by the Planning Secretary and considers the noise impacts from the surrounding roadways, proposing mitigation measures that have been integrated into the amended proposal.

The amended proposal is seeking more than 300 dwellings which is the threshold under Schedule 3 of the SEPP.

The proposed development is therefore considered traffic generating under the Transport and Infrastructure SEPP. TfNSW has provided a response which is addressed in the Rts.

The amended proposal seeks to establish a desirable future character for the site to the benefit of the surroundings, contributing public open space, permeable urban design and retail outlets to support the needs of the community.

Section 4.1.4

Revised Transport Impact Assessment (Appendix P)

Section 4.1.5

Revised NVIA (Appendix R)

Section 4.1.4

Revised Transport Impact Assessment (Appendix P)

Revised Design Report (Appendix F)

residential development is compatible with—

the desirable elements of the character of the local area, or

for precincts undergoing transition—the desired future character of the precinct.

Cumberland LEP 2021

Cl 5.21 Flood planning

Development consent must not be granted to development on land the consent authority considers to be within a flood planning area unless it is demonstrated the proposal is compatible with the flood function and will not be adversely impacted by the flood function.

Cl 6.20 Development of land at 1 Crescent Street, Holroyd —general

...

(2) Development consent must not be granted to development on the subject land unless a development control plan that provides for all of the following applies to the land—

(a) design principles drawn from an analysis of the land and its context,

...

(5) Development consent must not be granted to development on the subject land if—

the development results in the ground or first floor of a building being used for the purposes of residential accommodation, and

the building—

is on land in Zone MUI Mixed Use, and

The provision of 15% of the total GFA for affordable housing (in the context of 1,374 dwellings across the site) will serve the public good in tackling the housing shortage currently facing Greater Sydney.

Cumberland Council's flood mapping identified A'Becketts Creek as containing the 1% Annual Exceedance Probability (**AEP**) floodway. Small portions of the site along the frontage to Crescent Street and adjacent to the creek are within the 1% AEP land.

In addition to the Flood Risk Assessment submitted with the original SSD, a Flood Risk Assessment Cover Letter has been provided as an appendix to this report to assess the potential impacts of the amended proposal.

With the adoption of 'Part F1-20 1 Crescent Street, Holroyd' under Cumberland Development Control Plan 2021, a development control plan provides for all the provisions detailed under cl. 6.20(2) satisfying the pre-condition.

As stated in s.2.10 of the Planning Systems SEPP, development control plans do not apply to SSDAs. Nonetheless, the amended proposal has been assessed against the site specific DCP.

Refer to revised Statutory Compliance Table included at **Appendix B** for details.

The proposal complies with Clause 6.20(5) of the Cumberland LEP 2021 as documented in the Submissions Register (included at **Appendix A**) and specific contentions raised by Cumberland Council.

Flood Risk Assessment Cover Letter (Appendix EE)

Revised Statutory Compliance Table (Appendix B)

Submissions Register (Appendix A)

has frontage to Woodville Road.

3.7.5 Mandatory Considerations

The following table outlines the relevant mandatory considerations to exercising the power to grant approval and the section where these matters are addressed within this report.

Table 12 Mandatory Considerations

STATUTORY REFERENCE	MANDATORY CONSIDERATION	SECTION OF RTS REPORT
Consideration under the EP&A Act and EP&A Regulation		
Section 1.3	Relevant objects of the EP&A Act	Revised Statutory Compliance Table (Appendix B)
Section 4.15	Relevant environmental planning instruments	Appendix B
	Planning Systems SEPP	Appendix B
	Resilience and Hazards SEPP	Appendix B
	Transport and Infrastructure SEPP	Appendix B
	Housing SEPP	Appendix B
	Sustainable Buildings SEPP	Appendix B
	Cumberland LEP 2021	Submissions Register (Appendix A) and Appendix B
	<u>Relevant planning agreement or draft planning agreement</u>	Voluntary Planning Agreement no longer required for the application.
	Voluntary Planning Agreement for the site was entered into between the applicant and Council.	
	<u>Development control plans</u>	Cumberland DCP 2021 Assessment (Appendix B)
	Cumberland DCP 2021	
	The likely impacts of that development, including environmental impacts on both the natural and built environments, and social and economic impacts in the locality.	Section 4
	The suitability of the site for the development	Section 5
	The public interest	Section 5
Mandatory Relevant Considerations under EPIs		
Resilience and Hazards SEPP	Section 4.6 – Contamination and remediation to be considered in determining a development application	Section 4.1.6 and Appendix B
Transport and Infrastructure SEPP	Section 2.98 – Development adjacent to rail corridors	Section 4.1.4 and Appendix B
	Section 2.119 – Development with frontage to a classified road	
	Section 2.122 – Traffic-generating development	Revised Transport Impact Assessment (Appendix P)

Sustainable Buildings SEPP	Section 2.1 – Standards for BASIX development and BASIX optional development.	Revised ESD Report (Appendix AA)
Housing SEPP	Section 19 – Non – discretionary development standards Section 20 – Design Requirements Section 21 – Provision of affordable housing for 15 years.	Appendix B Revised Design Report (Appendix F)
Resilience and Hazards SEPP	Section 4.6 – Contamination and remediation to be considered in determining a development application	Section 4.1.6 and Appendix B
Cumberland LEP 2021	Objectives and land uses for MU1, R4 and RE1 Zones. Part 4 – Principal development standards Part 5 – Miscellaneous provisions Part 6 – Additional local provisions	Appendix B

Consideration under Other Legislation

BC Act – section 7.14	The likely impact of the proposed development on biodiversity values as assessed in the Streamlined Biodiversity Development Assessment Report (SBDAR). The Minister for Planning may (but is not required to) further consider under that BC Act the likely impact of the proposed development on biodiversity values.	Appendix B
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Development Control Plans

Cumberland DCP 2021	Clause 2.10 of the Planning Systems SEPP states that development control plans (whether made before or after the commencement of this Policy) do not apply to SSDs. As such, there is no requirement for assessment of the proposal against the CDCP 2021 for this SSDA. Notwithstanding this, consideration has been given to the following provisions: ▪ Part A Introduction and General Guidelines ▪ Part B Development in Residential Zones ▪ Part C Development in Business Zones ▪ Part F1-20 1 Crescent Street, Holroyd ▪ G2 Heritage ▪ G3 Traffic, Parking, Transport and Access (Vehicle) ▪ G4 Stormwater and Drainage ▪ G5 Sustainability, Biodiversity and Environmental Management ▪ G7 Tree Management and Landscaping ▪ G8 Waste Management	Appendix B
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Development
Contributions

Aside from the planning agreement detailed in **Section 2.3** of the EIS submitted with the original SSD, the following development contributions will apply to the proposal (and will be proportionately applied in accordance with the staged delivery of the development):

- **Housing and Productivity Contribution**
 - Residential – \$12,443,789.70 (1,154 x \$10,783.18 per dwelling)
 - Commercial – \$87,668.50 (2,710 m² x \$32.35 per m²)
 - Retail – \$80,745.60 (2,496 m² x \$32.35 per m²)
- **Section 7.12 Contributions** per Cumberland Local Infrastructure Contributions Plan 2020:
 - The applicant will pay the applicable contribution as considered under Council's Local Contribution Plan.

Refer to the **Staging Strategy** and proposed draft conditions **(Appendix NN)**

4

Assessment of Impacts

4 Assessment of Impacts

The following sections of this report provide a comprehensive description of the updated specialist technical studies undertaken to assess the potential impacts of the amended proposal. Where relevant, this includes updated mitigation measures that are recommended to avoid, mitigate and/or offset any potential adverse impacts as a result of the amended proposal

The detailed technical reports and plans appended to this report are individually referenced within the following sections. A summary of the updated mitigation measures (where relevant) is also included within the following sections of this report.

4.1 Detailed Assessment of Impacts

This section of the report provides a detailed assessment of the key issues which may have a significant impact on the site and locality. It provides a comprehensive assessment of the relevant issues and the mitigation measures required (where relevant) to avoid, mitigate and/or offset the impacts of the amended proposal.

4.1.1 Built Form and Urban Design

4.1.1.1 Massing, Bulk and Scale

Building Footprints

The amended design has reduced and refined building footprints across the precinct to improve separation distances between towers and reduce the perceived visual impact of the towers from the ground level. These changes reduce the overall bulk and scale of the buildings, enhance solar access and ventilation, and allow for greater integration of landscaping across the precinct.

The amended proposal introduces reduced built forms with the clear objective of lessening the overall bulk and scale of the buildings when viewed from Crescent Street. More efficient building layouts have resulted in more refined building footprints, more efficient internal layouts and enhanced privacy outcomes.

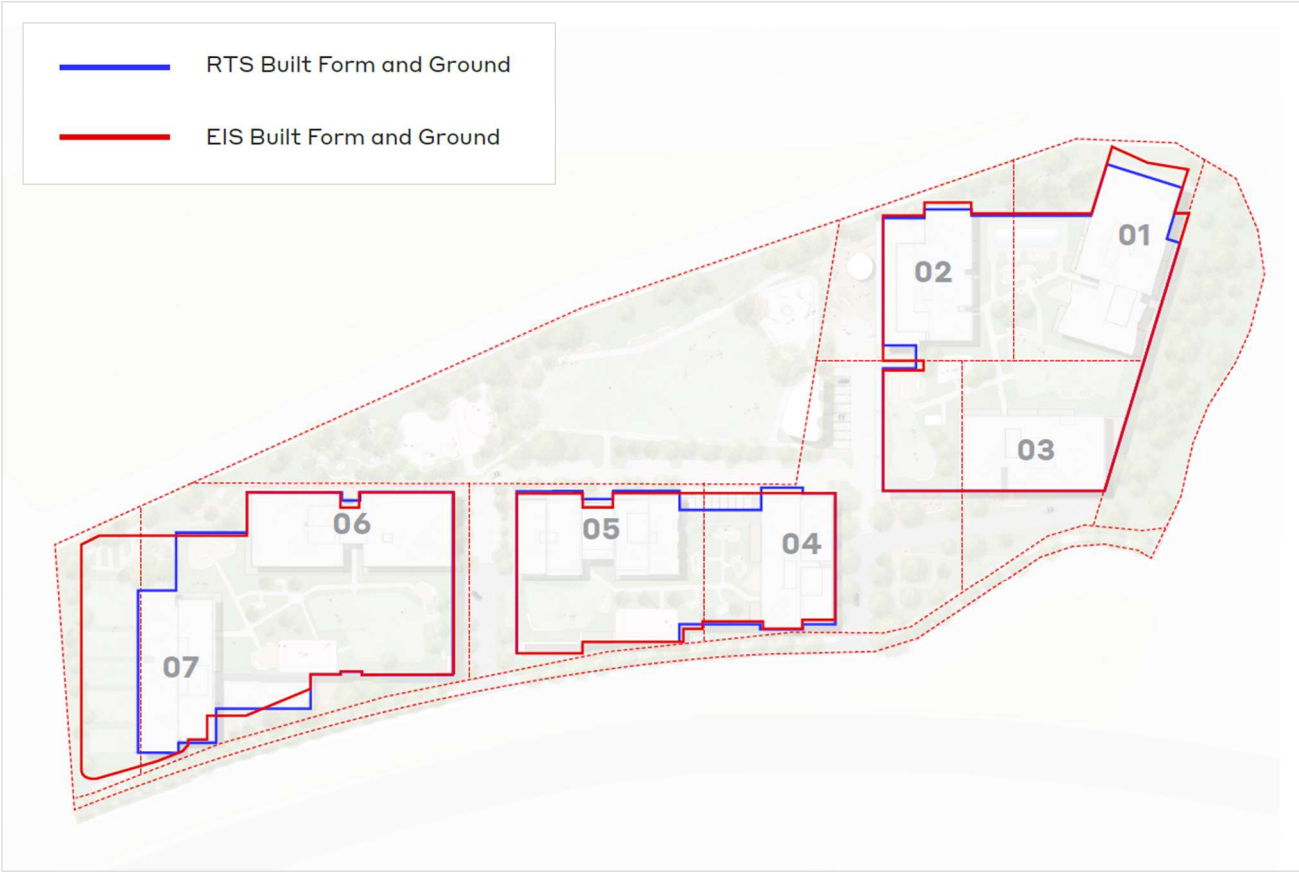
These changes also reduce the extent of overshadowing to neighbouring residential areas (particularly to the south) and improve solar access to areas of open space along Crescent Street. In addition, the podium forms have been reduced in height, ranging from between 8-storeys to 4-storeys overall, with the podium heights in Stages B and C reduced from 7-storeys to 4-storeys.

This redesign has unlocked substantial rooftop podium areas which achieves larger and higher quality areas of communal open space for the residents.

The podium massing has been generally maintained (in plan) within the amended proposal. However, the ground floor RLs have been lowered internally within the podiums to improve the ground level pedestrian experience and enhance connectivity with the adjacent commercial / retail uses fronting the park.

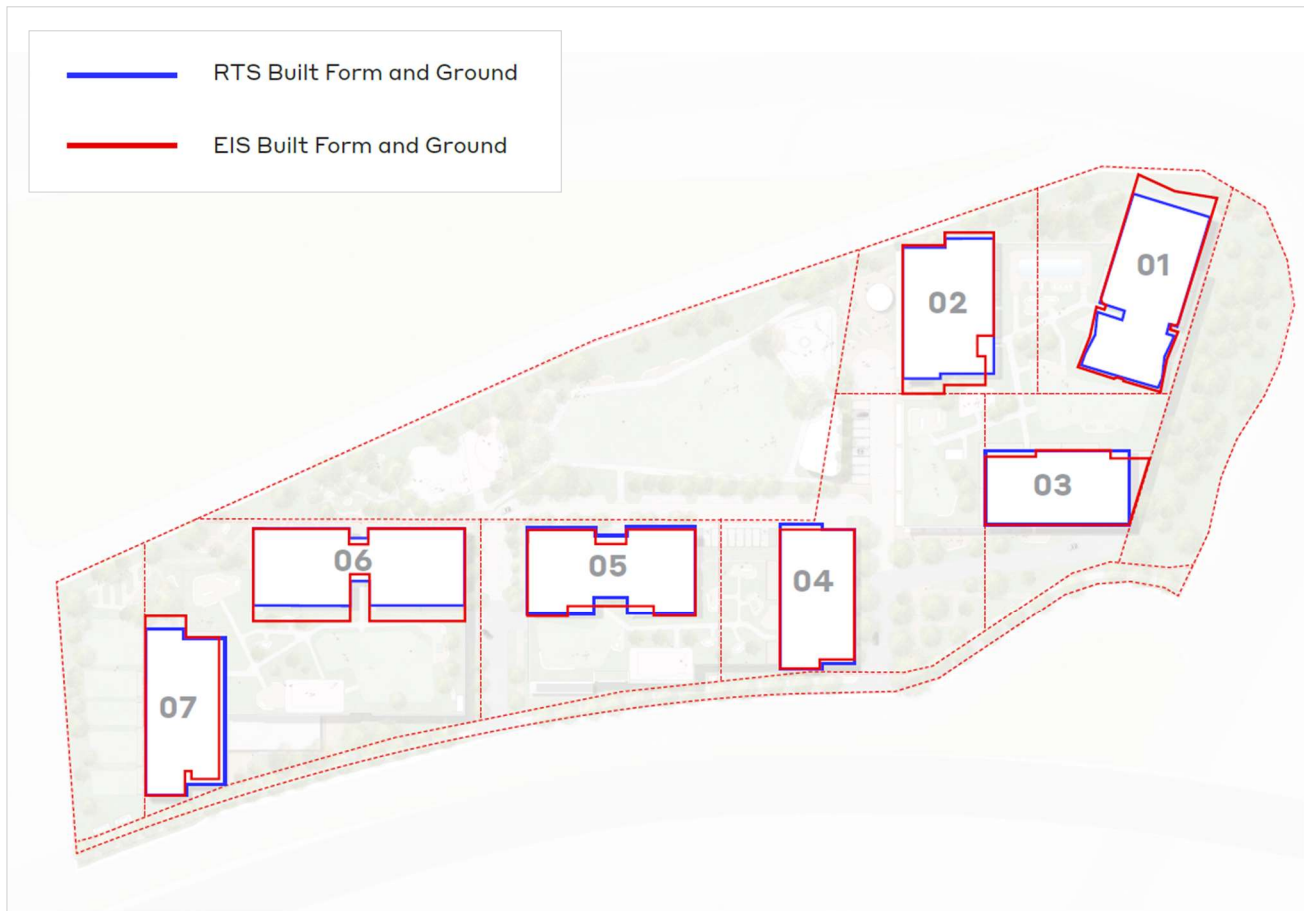
The reduction in building footprints within the amended proposal is shown in the following figures.

Figure 13 Site-Wide Comparison of Podium Footprints (Original SSD and Amended Proposal)



Source: Woods Bagot (2025)

Figure 14 Site-Wide Comparison of Podium Footprints (Original SSD and Amended Proposal)



Source: Woods Bagot (2025)

Podium Heights

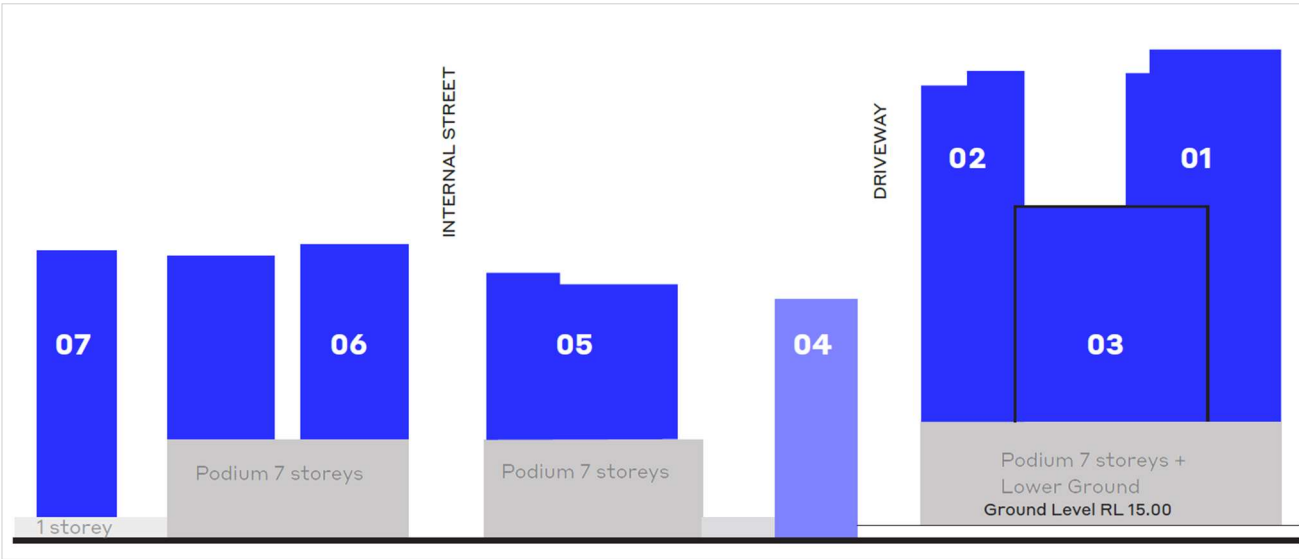
One of the most positive changes to the design and built form within the amended proposal is the significant reduction in podium height within Stage B (Buildings 4 and 5) and Stage C (Buildings 6 and 7). Within the original SSD, the podium heights of up to 6-7 storeys created a solid and heavy interface between the public domain and ground floor commercial / retail entries which increased overshadowing and compromised connectivity as well as the overall pedestrian experience.

The amended proposal has been refined to reduce the overall bulk and scale of the podium down to 4-storeys in height. The podiums have also been softened through the integration of additional screening and landscaping.

This increases sunlight penetration through the site, establishes a more human-scaled relationship with adjoining streets and open spaces, and improves the perceived visual impact of the podiums from the ground level. The redesigned podiums also enable more generous rooftop amenity spaces within Stages B and C which are easily accessed by residents of Buildings 4-5 within Stage B, and Buildings 6-7 within Stage C. The spacious rooftop amenity within Stage A has also been retained within the amended proposal.

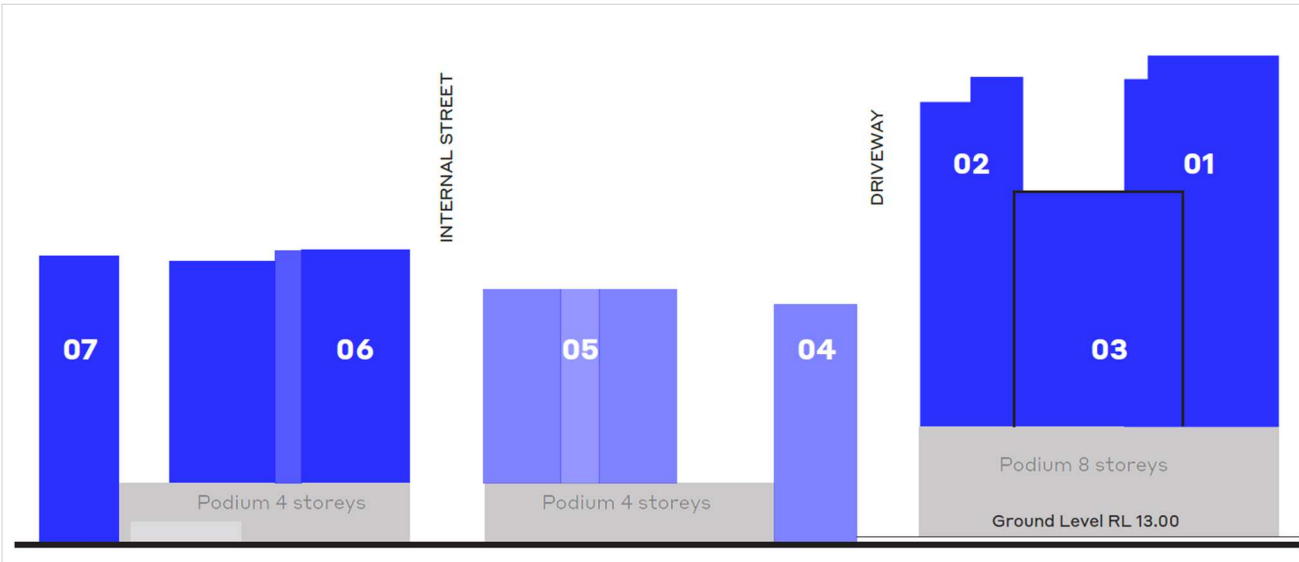
The proposed reduction in podium heights between the original SSD and the amended proposal is shown in the following figures.

Figure 15 Original SSD Building Footprints (Southern Elevation)



Source: Woods Bagot (2025)

Figure 16 Building Footprints of Amended Proposal (Southern Elevation)



Source: Woods Bagot (2025)

4.1.1.2 Building Height

The amended proposal results in a modest reduction of building heights across the site when compared to the original SSD. The changes to maximum building heights across the precinct is primarily due to refinements to the massing strategy, adjustments to the ground level RL datum, and the desire to achieve greater alignment with the applicable height planes and maximum permissible building height controls.

Within the eastern part of the site, Buildings 1 and 2 remain largely consistent with original SSD building heights. This maintains their role as the site's tallest elements in the skyline. Building 1 has been marginally reduced in height, and Building 2 has gained a single level with a negligible change in the overall maximum building height RL. This means that the perceived maximum building height of Building 2 within the amended proposal remains almost unchanged when compared to the original SSD proposal.

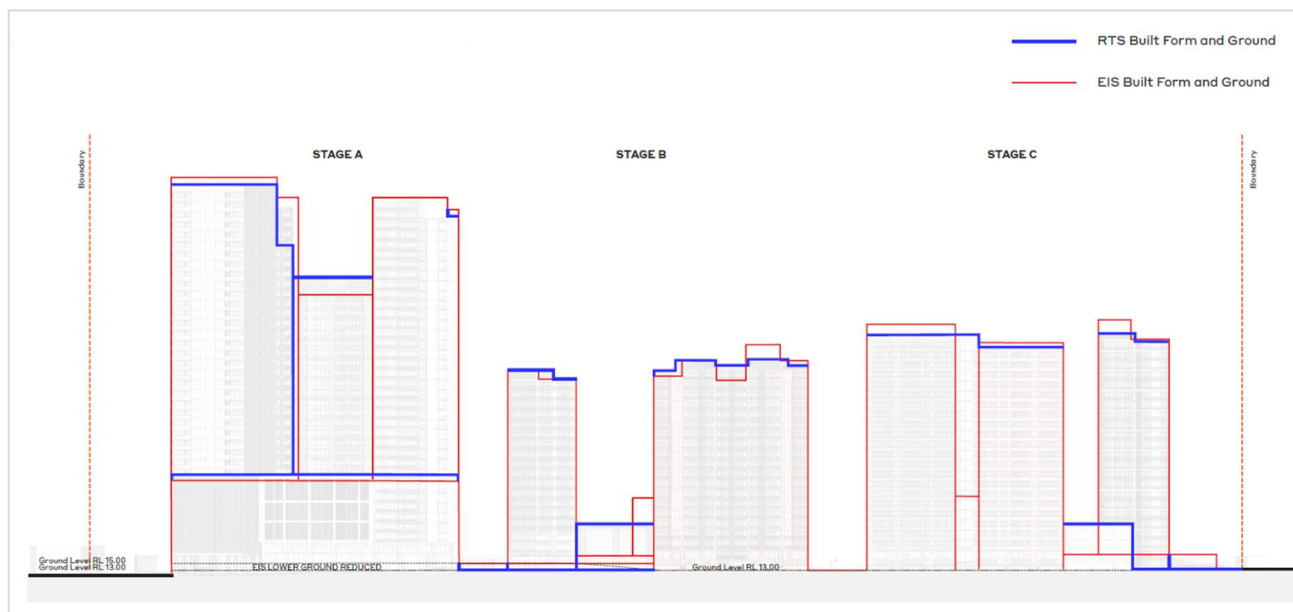
There has been a minor increase in the maximum building height of Building 3 which has increased in height from 25 storeys to 31 storeys. This increase in building height sits comfortably within the site's context, complies with the maximum permissible building height, and redistributes bulk away from the taller towers whilst also strengthening the mid-rise profile of the precinct.

By contrast, Buildings 5, 6 and 7 have each reduced in height by between four and seven metres. The reduction in building height for Buildings 6 and 7 is primarily due to the removal of the architectural roof features that were previously proposed within the original SSD. The reduction in building heights across these three buildings within the western part of the site moderate bulk at the edges of the precinct and improve the pedestrian experience between the ground floor and adjacent public open space. There has been no change in the height of Building 4 within the amended proposal.

Overall, the amended proposal achieves a more balanced distribution of height across the precinct. Despite Building 3 increasing in height, this complies with the maximum permissible building height. The increase in height to Building 3 is also offset by the reduction in height to other buildings. This ensures that the proposed built form across the precinct remains consistent with the original design intent while also improving the relationship to the ground plane and surrounding context.

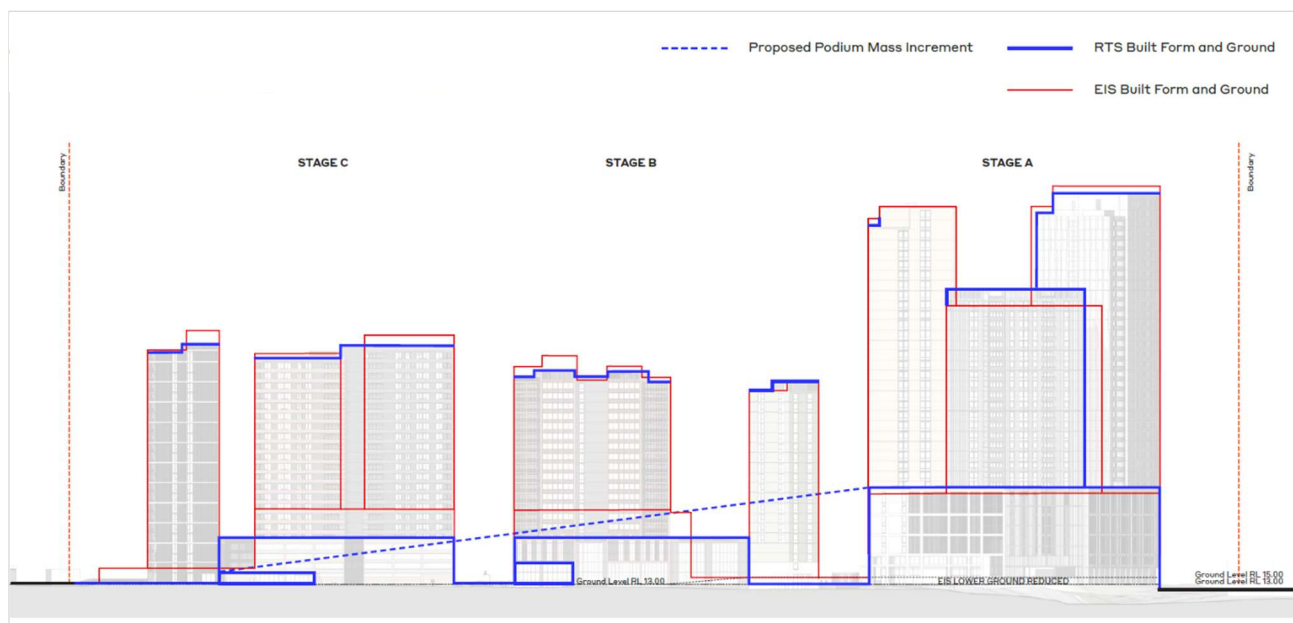
The proposed change in building heights between the original SSD and the amended proposal is shown in the following figures.

Figure 17 Proposed Amendments to Built Form, Height and Massing (North Elevation)



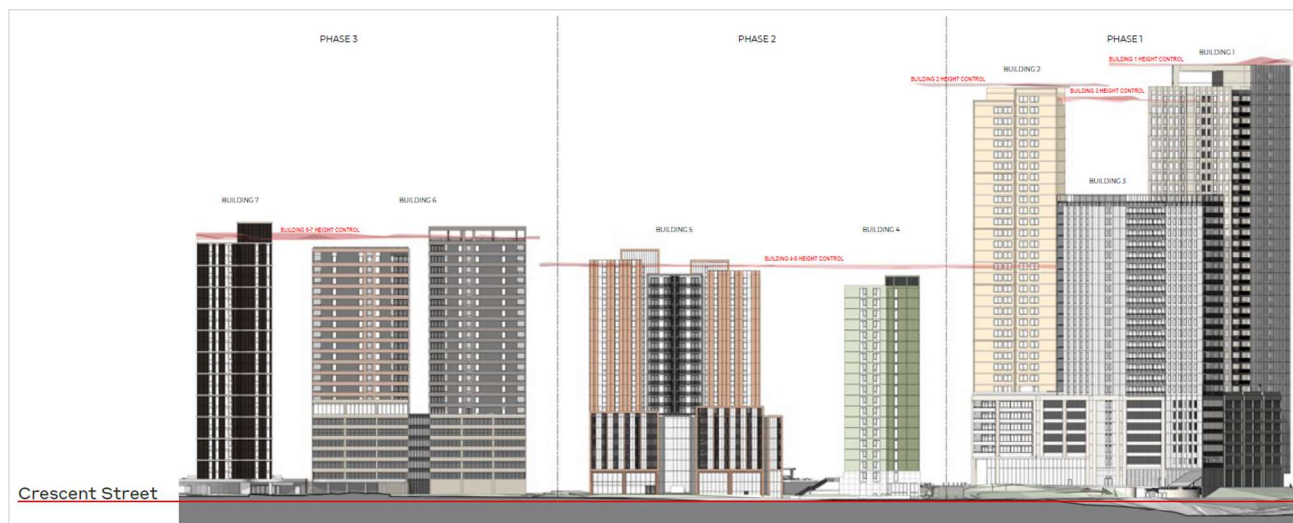
Source: Woods Bagot (2025)

Figure 18 Proposed Amendments to Built Form, Height and Massing (South Elevation)



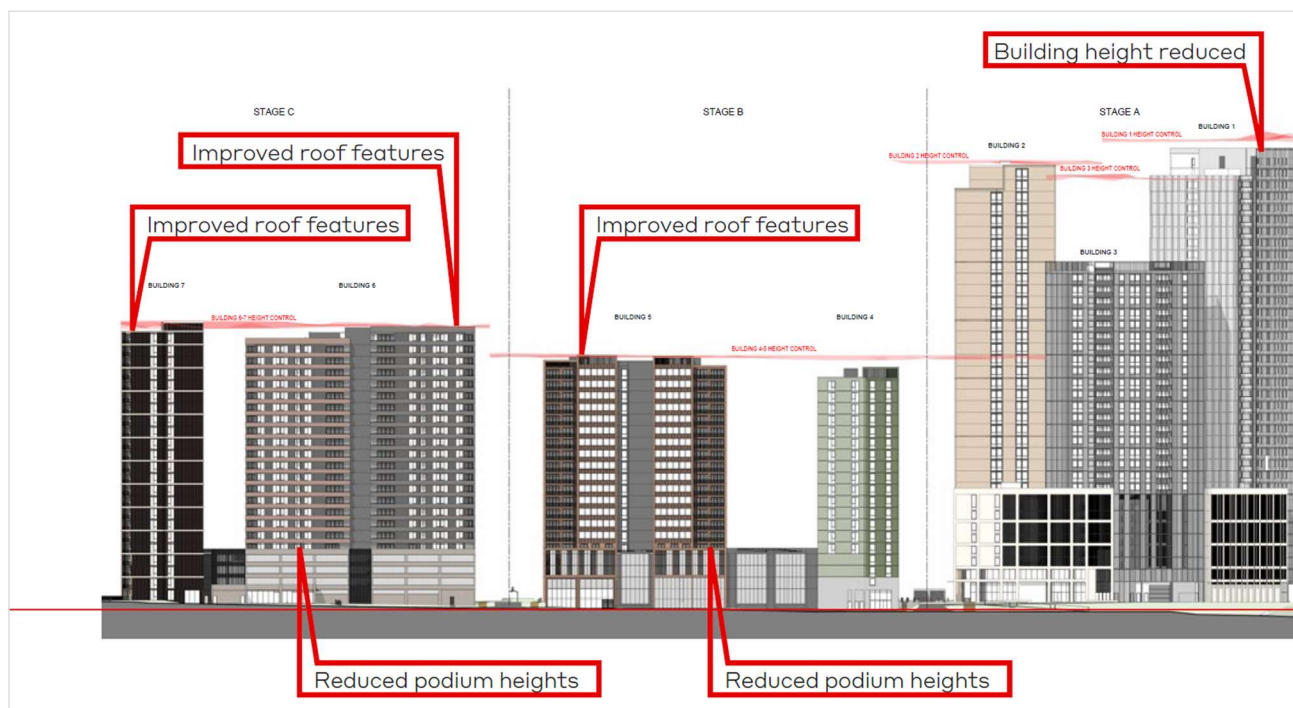
Source: Woods Bagot (2025)

Figure 19 Original SSD Building Heights (Southern Elevation)



Source: Woods Bagot (2025)

Figure 20 Building Heights of Amended Proposal (and Key Benefits)



Source: Woods Bagot (2025)

Clause 4.3 of the Cumberland LEP 2021 establishes various mapped maximum building height controls across the site. These are summarised in the table below. The proposed development (as amended) seeks to incorporate an additional 30% height in accordance with the infill affordable housing incentives under the Housing SEPP (subject to providing 15% affordable housing).

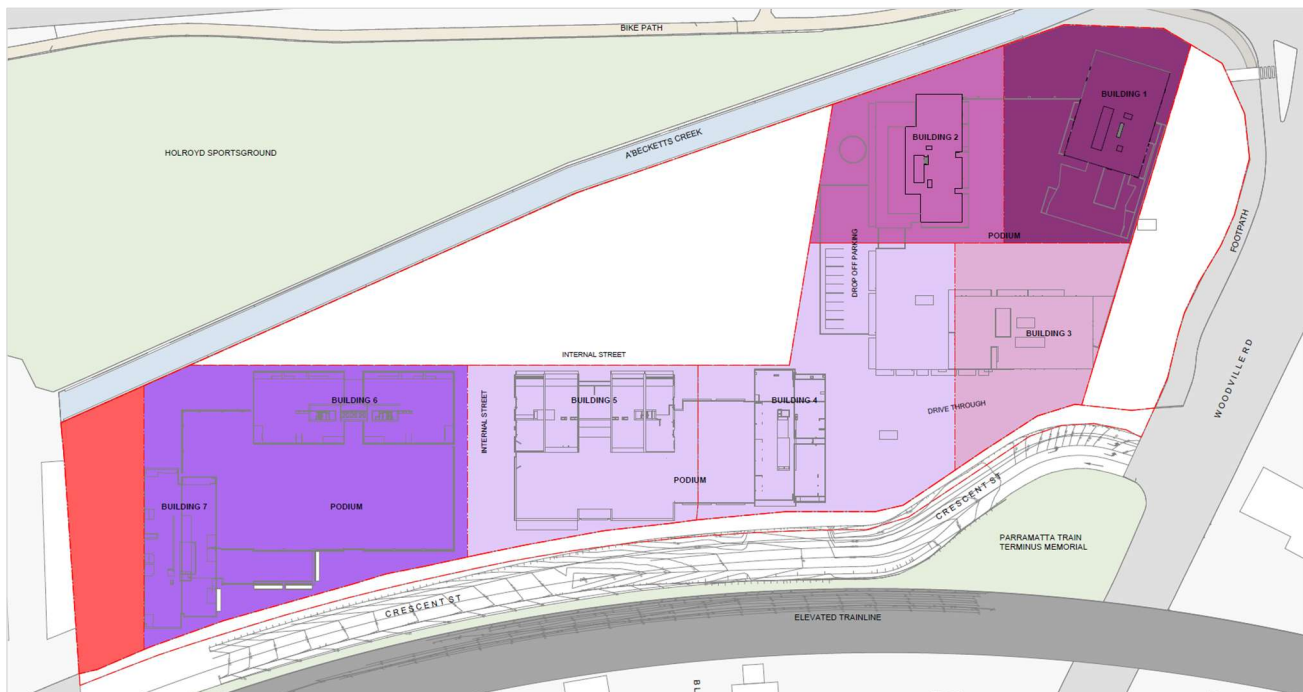
The table also sets out the maximum permissible building heights inclusive of the additional 30% height (in accordance with the Housing SEPP infill affordable housing incentives).

Table 13 Summary of Maximum Permissible Building Heights

BUILDING	ZONING	LEP HEIGHT CONTROL	MAXIMUM HOUSING SEPP HEIGHT (+30%)
Stage A			
Building 1	MU1 Mixed Use	96 metres	124.8 metres
Building 2	MU1 Mixed Use	91 metres	118.3 metres
Building 3	MU1 Mixed Use	88 metres	114.4 metres
Stage B			
Building 4	MU1 Mixed Use	51 metres	66.3 metres
Building 5	R4 High Density Residential	51 metres	66.3 metres
Stage C			
Building 6	R4 High Density Residential	57 metres	74.1 metres
Building 7	R4 High Density Residential	57 metres	74.1 metres

The figure below shows the proposed footprint of all buildings and open spaces (as amended) overlaid with the Cumberland LEP 2021 building height controls, and is provided for information only.

Figure 21 Proposed Site Plan (as Amended) Overlay with Cumberland LEP 2021 Height Controls



Source: Woods Bagot (2025)

The building heights of the amended proposal are summarised in the table below. Minor variations to the maximum permissible building height controls are sought for Buildings 2, 5, 6 and 7. However, the extent of the variations have been significantly reduced compared to the building heights proposed within the original SSD.

Table 14 Building Heights of Amended Proposal

Building	LEP Height	Height + 30%	Amended Proposal	Compliance
Stage A				
Building 1	96 metres	124.8 metres	122.95 metres (RL 134.05)	Complies
Building 2	91 metres	118.3 metres	119.11 metres (RL 130.70)	Variation (+0.81m / 0.68%)
Building 3	88 metres	114.4 metres	92.43 metres (RL 103.80)	Complies
Stage B				
Building 4	51 metres	66.3 metres	64.23 metres (RL 75.70)	Complies
Building 5	51 metres	66.3 metres	66.49 metres (RL 78.90)	Variation (+0.19 / 0.28%)
Stage C				
Building 6	57 metres	74.1 metres	74.19 metres (RL 86.50)	Variation (+0.09m / 0.12%)
Building 7	57 metres	74.1 metres	75.80 metres (RL 87.80)	Variation (+1.7m / 2.29%)

These minor variations to the maximum permissible building height are considered supportable for the following reasons:

- The proposal includes 15% of the total GFA as affordable housing, contributing to a significant public benefit by addressing the need for housing for very low, low, and moderate-income households.
- The location, design, and amenity of the affordable housing respond to identified demand and align with the Housing SEPP's overarching goal of facilitating infill affordable housing near services and public transport.
- The proposal aligns with the intended future high-density character envisioned during the site's rezoning process. In addition, the site's mixed-use and high density zoning reflect the planned urban renewal of the area, which further supports the rationale for increased building height.
- The proximity to the proposed New Cumberland Rail Line and strategic urban renewal sites underscores the site's suitability for higher-density development.
- Detailed overshadowing analysis demonstrates that additional shadow impacts from exceedances are minimal, accounting for less than 1% of shadowing in winter solstice periods.
- Design measures, such as setbacks, increased building separation distances and a reduction in the overall building heights across the site have reduced the impacts of overshadowing. Most properties to the south still achieve two hours of sunlight, with only a small number of exceptions balanced by broader public benefits.
- The architectural design incorporates:

- Varied building forms, setbacks, and articulation to reduce visual bulk and create an engaging streetscape.
- Recessed upper levels and lightweight architectural features reduce height perceptions.
- Separated and orientated buildings to maintain openness and reduce overshadowing.
- If the built form did not include the architectural roof features and was entirely within the planning controls, then the building could not be delivered as proposed and would present as a homogeneous and unarticulated built form.
- The revised Visual Impact Assessment confirms that the proposed measures achieve an acceptable level of visual integration with the surrounding area.
- The proposal delivers significant public benefits, including the long-term provision of affordable housing for at least 15 years, high quality amenity for affordable housing tenants, and urban renewal within the Cumberland LGA which is aligned with broader strategic planning goals.
- The proposed height variations do not increase the intensity of the uses on the site. No residential GFA is proposed above the maximum building height plane.

Refer to the revised Clause 4.6 Variation Request (Height) included at **Appendix V** for more details regarding the proposed variations to the maximum permissible building heights for Buildings 2, 5, 6 and 7.

4.1.1.3 Floor Space Ratio

Clause 4.4 of the Cumberland LEP 2021 establishes a mapped maximum FSR of 3.75:1 on the land zoned MUI Mixed Use (within the eastern portion of the site), and a mapped maximum FSR of 3.4:1 on the land zoned R4 High Density Residential (within the western portion of the site).

As noted above, the proposed development (as amended) seeks to incorporate an additional 30% FSR in accordance with the infill affordable housing incentives under the Housing SEPP (subject to providing 15% affordable housing).

The GFA and FSR calculations have been comprehensively reviewed and updated following the design changes made to the proposed development in response to submissions received. In addition, the applicant also engaged an independent surveyor to verify and confirm that the correct site areas have been adopted for the purpose of justifying the site-specific FSR variations across the site.

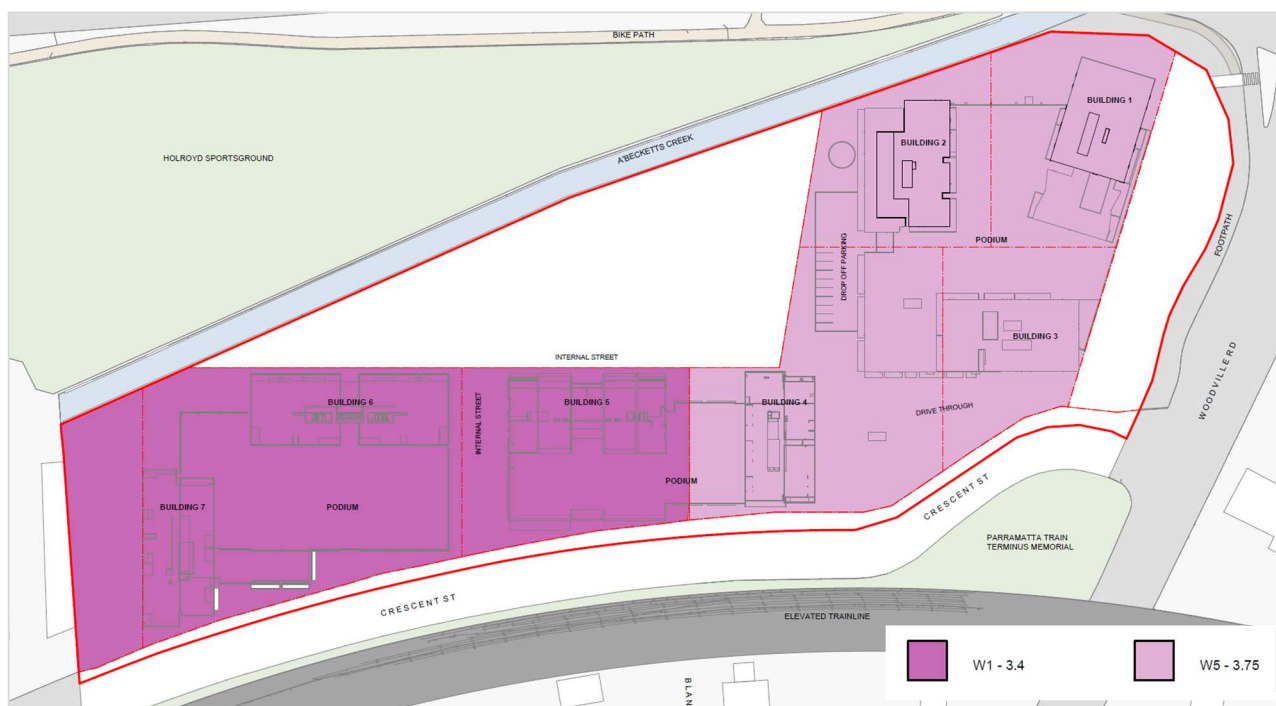
Based on this technical verification, the FSR areas have been accurately determined to align with the relevant zone boundaries, as follows:

- Mapped FSR of 3.75:1 under the Cumberland LEP 2021 – applicable to the eastern portion of the site zoned MUI Mixed Use.
- Mapped FSR of 3.4:1 under the Cumberland LEP 2021 – applicable to the western portion of the site zoned R4 High Density Residential.

The figure below shows the proposed footprint of all buildings, open spaces and the public domain (as amended) overlaid with the Cumberland LEP 2021 FSR controls.

This plan is provided for information only and shows that Buildings 1, 2, 3 and 4 are located on the part of the site with a mapped FSR of 3.75:1, and Buildings 5, 6 and 7 are located on the part of the site with a mapped FSR of 3.4:1. It is noted that there are portions of the site which are not subject to a mapped FSR control under the Cumberland LEP 2021.

Figure 22 Proposed Site Plan (as Amended) Overlay with Cumberland LEP 2021 FSR Controls



Source: Woods Bagot (2025)

The table below provides a summary of the FSR controls that apply to the site, as well as the site area calculation that was applied as part of the original SSD. The site areas listed in the table below were relied upon for the purpose of calculating the overall GFA as well as the extent of variation to the maximum permissible FSR as a result of the proposed development.

Table 15 Summary of Maximum Permissible FSR and Site Area Calculation

LOCATION	ZONING	SITE AREA	LEP FSR CONTROL	MAX. HOUSING SEPP FSR (+30%)
<u>Eastern Portion</u>	MUI Mixed Use	16,267 m ²	3.75:1	4.875:1
Buildings 1, 2, 3 + 4				
<u>Western Portion</u>	R4 High Density Residential	12,406 m ²	3.4:1	4.42:1
Buildings 5, 6 + 6				
OVERALL		28,673 m²		

The surveyor has undertaken a detailed assessment of the zoning information by sourcing Geographic Information System (**GIS**) data and importing it into AutoCAD, with both the zoning and site boundaries aligned using MGA coordinates. However, the zoning data prepared by the Council covers a broader area than the site itself. As such, the overlay shows minor discrepancies of approximately 80mm to 100mm between the zoning and cadastral boundaries.

A comparison of zoning areas derived from GIS data against those in the SSDA submission reveals small variations in zone areas. These minor differences are attributed to the imperfect alignment between the GIS zoning data and the site boundary. This is not uncommon given that GIS datasets are not survey accurate and were historically compiled from image-based sources, particularly those based on the Digital Cadastral Data Base (**DCDB**).

The discrepancies in zoning areas across the site are outlined in the table below. This table notes the difference in GIS data confirmed by the surveyor by comparison with the verified site areas noted within the SSDA as originally lodged.

Table 16 Review of GIS Data for the FSR Calculation

ZONE	SURVEYOR GIS DATA	PROPOSED (+ VERIFIED)	DIFFERENCE
R4 Zone	12,246 m ²	12,406 m²	+ 160 m ²
MUI Zone	16,172 m ²	16,267 m²	+ 95 m ²
SP2 Zone	1,550 m ²	1,490 m²	- 60 m ²
RE1 Zone	7,860 m ²	7,714 m²	- 146 m ²
SITE AREA	37,828 m²	37,877 m²	- 49 m ²

Importantly, GIS zoning lines are commonly adjusted in practice to align with actual cadastral lot boundaries. The GIS data used noted above should be viewed as indicative rather than definitive, allowing flexibility where necessary to support a more detailed assessment.

In addition, at the Planning Proposal (PP) stage (PP-2020-1970), it was agreed that the RE1 Public Open Space zone would comprise 7,714m². This figure was later incorporated within the site-specific DCP, which includes the following provision:

“C5. Provide a range of public and communal open spaces and facilities, including:

an embellished and dedicated public open space based on the RE1 zoning (approximately 7,700 m²)

This confirms that the site area adopted for the part of the site zoned RE1 Public Recreation is consistent with the site areas that have been historically and consistently applied since the Planning Proposal stage.

Following this comprehensive assessment that has been undertaken of the relevant site areas across the site, the surveyor confirmed that the site areas noted within the SSDA as originally lodged are accurate. No changes are proposed to the site areas across the site as a result of the Surveyor's assessment.

In other words, the portion of the site zoned R4 High Density Residential (which is subject to a mapped FSR of 3.4:1) comprises a verified area of 12,406 m², and the portion of the site zoned MUI Mixed Use (which is subject to a mapped FSR of 3.75:1) comprises a verified area of 16,267 m². In accordance with the original SSD submission, the total site area is 37,877 m² for the purpose of calculating GFA and FSR.

Based on the total GFA of the amended proposal set out within **Section 3.4.3.1** of this report, the calculation of GFA and FSR in accordance with the verified site areas is summarised in the table below.

Table 17 Proposed Calculation of FSR for Amended Proposal

Site Area	FSR Control	FSR + 30%	Maximum GFA	Proposed GFA	Proposed FSR	Compliance
16,267 m ²	3.75:1	4.875:1	79,301.62 m ²	83,376 m ²	5.13:1	Variation (4,074.38 / 5.13%)
12,406 m ²	3.4:1	4.42:1	54,834.52 m ²	50,830 m ²	4.09:1	Complies
28,673 m²	-	-	134,136.14 m²	134,206 m²		

The minor variations to the maximum permissible FSR control for the eastern part of the site considered supportable for the following reasons:

- The overall GFA proposed in the development is equivalent to the total GFA allocated to the total site under the Cumberland LEP 2021 and Housing SEPP. What is gained in the eastern part of the site with a mapped FSR of 3.75:1 is equivalently lost in the western part of the site with a mapped FSR of 3.4:1.
- The pooling of the available GFA (and its realisation as a mixed-use building on part of the site), and the delivery of a significant area of public open space over another part of the site provides a development outcome that is consistent with the objectives of the MU1 and R4 zones and the intent of the original Planning Proposal (PP-2020-1970). It also facilitates the delivery of a significant community benefit in the upgrading of public open space.
- The proposed built form (as amended) provides a contextually appropriate response to the current site's future character, having consideration to its current planning context. The outcomes of this are as follows:
 - A greater focus on density within the north-eastern corner of the site and reducing the number of apartments more directly affected by the raised railway line.
 - The redistribution of density to the eastern portion of the site allows delivery of a more appropriate pedestrian interface both within the site's public domain and along Crescent Street for Buildings 4-5 and Buildings 6-7, as well as an active and vibrant mixed-use podium supporting the forecourt and pedestrian linkage to the surrounding Holroyd open spaces (including the Holroyd Sportsground).

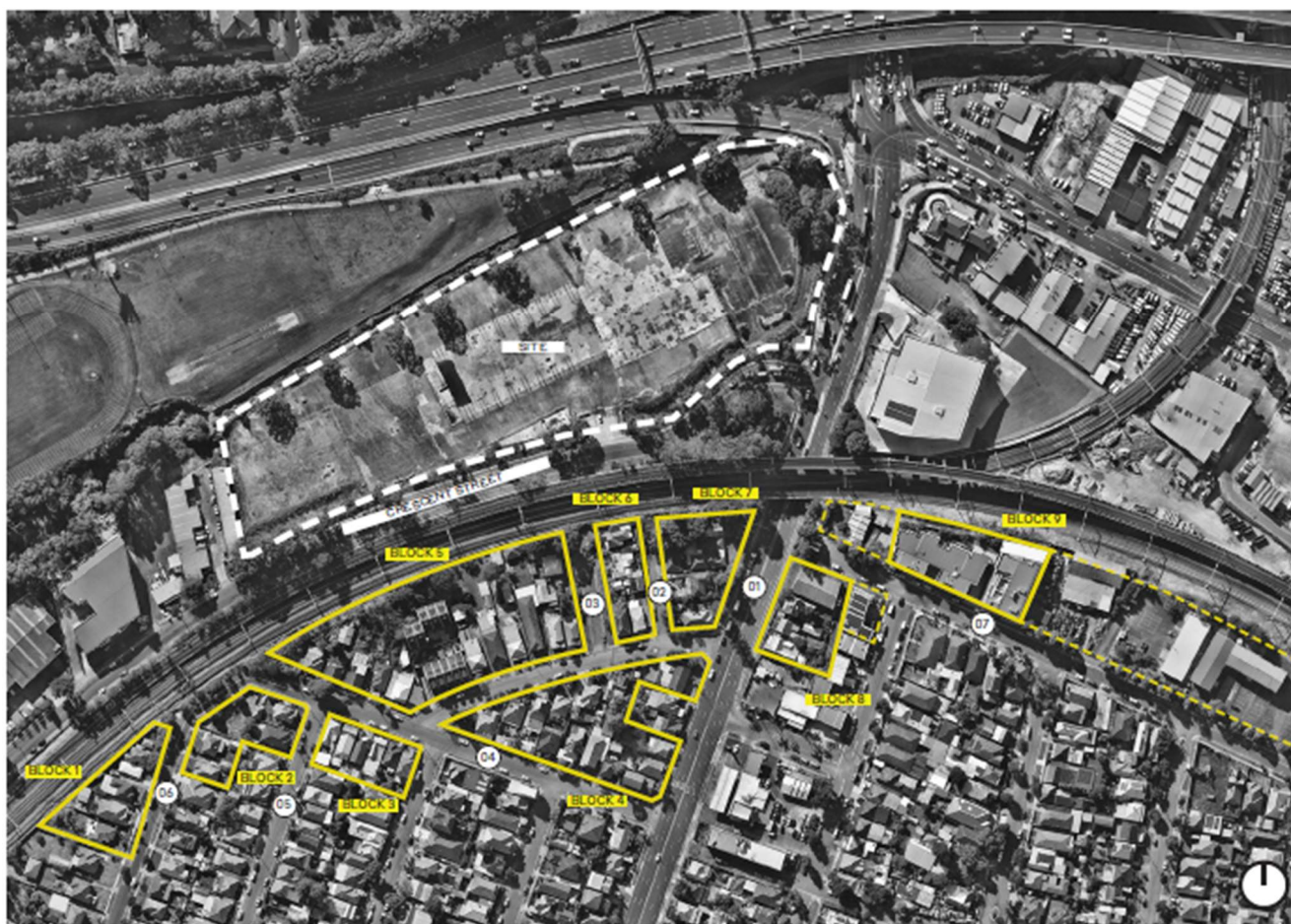
Refer to the revised Clause 4.6 Variation Request (FSR) for more details regarding the proposed variation sought to the maximum permissible FSR within the eastern part of the site.

4.1.2 Environmental Amenity

4.1.2.1 Overshadowing

The ADG provides design guidance to minimise overshadowing of neighbouring developments, particularly in dense urban areas where it may not be feasible for 70% of dwellings to achieve 2 hours of solar access in mid-winter, as per ADG standards.

Figure 23 Diagram of Properties Assessed within Overshadowing Analysis



Updated shadow analysis has been prepared for mid-winter (21 June) between 9am and 3pm for the amended proposal (refer to the revised Architectural Plans and revised Design Report at **Appendix E and Appendix F**). They identified properties impacted by the proposed building shadows have been grouped into blocks as part of this analysis. The revised overshadowing analysis indicates that the amended proposal will allow solar access for at least 2 hours in midwinter to 56 out of 58 properties located on the south site.

The table below compares the overshadowing from the original SSD compared to the overshadowing from the amended proposal.

Overall, the amended proposal has marginally increased the extent overshadowing at 11am and 12pm by 2.62% (or 844 m²). However, there has been an 8.38% or 5,694 m² improvement in the extent of overshadowing compared the original SSD, particularly at 9am, 10am, 1pm, 2pm, and 3pm.

Table 18 Comparison of Overshadowing Assessment (Original SSD and Amended Proposal)

LOCATION	ORIGINAL SSD	AMENDED PROPOSAL
Block 1	Complied	Complies – The overshadowing impact has been removed for 6 Boomerang Street at 9am, now achieving solar access at 9am.
Block 2	Complied	Complies – The overshadowing impact has been removed for 3 Boomerang Street at 10am, now achieving solar access at 10am.

Block 3	Complied	Complies – The overshadowing impact has been removed for 22 Union Street at 12pm, now achieving solar access at 12pm.
Block 4	Complied	Complies – The overshadowing impact has been removed for 12 Wallace Street, 22 Woodville Road, and 1B Union Street at 2–3pm, now achieving solar access at 2–3pm.
Block 5	2 out of 12 properties are not achieving 2 hours of solar access at 1/176–19 Wallace Street and 4 Blane Street.	No change – Only 2 properties out of 12 are not achieving the 2 hours of solar access at 1/176–19 Wallace Street and 4 Blane Street.
Block 6	Complied	Complies – Improved solar access to 3 Wallace Street at 11am and 1 Wallace Street at 2pm.
Block 7	Complied	Complies – 8 Woodville Street has reduced solar access at 11am. Solar access has increased at 3pm at 8 and 10 Woodville Road.
Block 8	Complied	Complies – no change
Block 9	Complied	Complies – no change

Overall, the extent of overshadowing has been improved by 8% on neighbouring properties as part of the amended proposal. This represents an increase in solar access to the properties to the south compared with the original SSD.

Out of a total of 8 blocks with 58 properties located to the south of the site, only 2 properties within the blocks do not receive the minimum recommended 2 hours of solar access. However, these shadows are fast-moving and there has been an improvement in overall solar access for several properties to the south of the site throughout the day. As a result, the extent of overshadowing is considered acceptable.

In addition, the amended proposal is compatible with the future character of the immediate area and is consistent with the objectives of the Housing SEPP (which seek to incentivise the development of affordable housing by allowing height and floor space bonuses on sites in accessible locations).

The additional height and density allowed for under the Housing SEPP incentives would not result in any material additional or unacceptable overshadowing impacts to neighbouring properties. Refer to the revised Design Report included at **Appendix F** for further details.

4.1.2.2 Solar Access

When assessed across the entire precinct, a total of 69% of apartments achieve at least two hours of solar access between 9:00 am and 3:00 pm. This is marginally below the ADG recommended minimum of 70% of all apartments. However, the amended proposal represents a 4% improvement in solar access compliance compared to the original SSD (for apartments receiving 2 hours of solar access between 9:00 am and 3:00 pm).

Despite this very minor shortfall, the majority of apartments receive 2 hours of solar access between either 9:00 am and 3:00 pm or extended hours between 8:00 am and 4:00 pm. The table below demonstrates that sufficient solar access is received for all buildings when taking into consideration the extended hours between 8:00 am and 4:00 pm.

For Building 1 to meet two hours of solar access on June 21 an extension of the hours from 8:00 am to 4:00 pm, is required, this has been reflected in the table below.

Table 19 Assessment of Solar Access Compliance (8:00 am – 4:00 pm)

Location	2 hours (9am – 3pm) at EIS stage	2 hours (9am – 3pm) at RTS stage	2 hours (incl. 8am – 4pm) (extended hours)	Difference (between EIS stage and RTS stage 9am – 3pm)
Stage A				
Building 1	60%	51% (143 units)	91 % (255 units)	-9 %
Building 2	38%	72 % (190 units)	No additional solar access gained	+34 %
Building 3	57%	63 % (95 units)	0 %	+6 %
Stage B				
Building 4	83%	60 % (80 units)	0 %	-23 %
Building 5	84%	89 % (129 units)	No additional solar access gained	+5 %
Stage C				
Building 6	68%	82 % (166 units)	No additional solar access gained	+14 %
Building 7	89%	74 % (149 units)	No additional solar access gained	-15 %
OVERALL	65%	69% (952 units)	77% (1,064 units)	+5%

The total of 77% of apartments receiving solar access has been calculated based on an extended assessment period from 8am to 4pm, rather than the 9am to 3pm period used at the RTS stage. Within this extended timeframe, Building 1 achieved solar access for 91% (255 units). The additional morning and afternoon hours resulted in an 8% increase in apartments receiving solar access, equivalent to an additional 112 units benefiting from sunlight during the extended period.

The inclusion of extended solar access hours (8:00 am–9:00 am and 3:00 pm–4:00 pm) is a reasonable adjustment when taking into consideration the site-specific constraints, as well as the overall contribution of the site to the provision of additional residential homes (including affordable housing).

This approach allows the critical morning and afternoon sunlight to be captured which supplements the standard ADG hours of 9:00am to 3:00pm at mid winter. This approach also reflects the flexibility permitted under the ADG to accommodate unique site contexts and considerations.

The built form controls established during the rezoning of the site, contextual site considerations and revised design and layout of massing across the site (in response to feedback received within the submissions) have significantly influenced the orientation and layout of the buildings. As a result, this impacts the extent of solar access achieved across the site.

Importantly, the extent of solar access achieved for Building 2 within the amended proposal has increased by 34% compared to the original SSD. There have also been noticeable improvements in the extent of solar access to Buildings 3, 5 and 6.

As part of the design changes to podium heights, building footprints and overall massing within the amended proposal, the extent of solar access for Buildings 4 and 7 has reduced since the original SSD. The reduction in solar access for Building 4 is predominantly due to the reconfiguration of the podium and the rationalisation of the carpark layout which has led to a decrease of the west-facing apartments at the lower level.

For Building 7, the podium has been similarly reconfigured and the car park layout has also been rationalised which has resulted in a decrease of east-facing apartments at the lower level. Importantly, Building 7 still exceeds the minimum recommended 2 hours of solar access between 9:00 am and 3:00pm at mid-winter.

The reduction in solar access to Building 4 within the amended proposal is noted. Notwithstanding this, the benefits of reducing the podium heights (and car parking layouts as a result), lessening the overall bulk and scale of the buildings, and achieving more efficient building layouts with enhanced privacy outcomes is considered to outweigh this reduction in the recommended minimum ADG solar access for Building 4.

The ADG also explicitly provides for flexibility where site-specific constraints or opportunities necessitate alternative solutions. This flexibility is routinely adopted when the broader intent of the ADG (ensuring residential amenity) is achieved. This approach maintains the balance between strictly adhering to guidelines and addressing site-specific challenges effectively.

As noted above, the amended proposal represents a 4% improvement in solar access compliance compared to the original SSD (for apartments receiving 2 hours of solar access between 9:00 am and 3:00 pm). Overall, the minor departure from the minimum ADG solar access recommendation achieved by the amended proposal is considered acceptable.

Refer to the revised Design Report for further details on solar access compliance across the site. Refer to the revised Design Report included at **Appendix F** and revised ADG Assessment included at **Appendix G** for further details.

4.1.2.3 Natural Ventilation

The revised Architectural Plans and Design Report demonstrate that 73% of apartments across the entire development are naturally cross-ventilated. This exceeds the recommended minimum ADG standard of 60%, and represents a 16% improvement compared to the original SSD.

An assessment of the amended proposal's compliance against the ADG requirement for natural cross ventilation is summarised in the table below. This table also compares the amended proposal's compliance compared to the original SSD scheme, and demonstrates that natural ventilation has improved across all buildings (with the exception of Building 1 where compliance remains the same).

Table 20 Assessment of Natural Ventilation Compliance

LOCATION	ORIGINAL SSD	AMENDED PROPOSAL	DIFFERENCE
Stage A			
Building 1	56%	56%	N/A – no change
Building 2	60%	63%	+3%
Building 3	67%	75%	+8%
Stage B			
Building 4	67%	83%	+16%
Building 5	52%	67%	+15%
Stage C			
Building 6	48%	79%	+31%
Building 7	58%	74%	+16%
OVERALL	57%	73%	+16%

A ducted ventilation strategy has been adopted for two apartments per level, drawing fresh air through the corridors and into the apartments. This approach improves internal air quality while reducing potential

acoustic impacts along the southern façade. This strategy aligns with the approach adopted in the approved SSDA (SSD-73228210) by Turner Studio for 129–153 Parramatta Road and 53–75 Queens Road, Five Dock.

For Building 05, this strategy achieves 67% cross-ventilation compliance, compared to 49% if the approach were excluded. When assessed at a precinct wide level, the overall impact on cross-ventilation compliance is minimal. Nevertheless, the continued use of this fresh air strategy provides a significant amenity benefit for mentioned apartments by improving air movement, comfort, and liveability.

The ADG recommends that 60% of apartments within the first nine storeys of a building must achieve natural cross ventilation. For apartments located above this level, the proposed design seeks to ensure natural ventilation can be achieved by incorporating balconies that allow adequate ventilation and cannot be fully enclosed. As a result, the percentages outlined above represent a conservative assessment often undertaken on a small sample size (within the first 9 levels) and do not fully reflect the cross-ventilation performance of the entirety of each building.

The design of Building 1 falls marginally below the recommended minimum ADG standard of 60% for the first nine storeys. However, the design and layout of Building 1 has been carefully considered and optimised within the constraints of the site to maximise cross-ventilation where practical. This minor shortfall is mitigated through the implementation of alternative ventilation strategies including operable ventilated facades, as well as improvements to the layout and orientation of Building 1 which ensure a high level of residential amenity is achieved.

As a result, the extent of natural ventilation that is achieved by the amended proposal is considered acceptable. Refer to the revised Design Report at **Appendix F** for further details on natural ventilation compliance across the site.

4.1.2.4 Wind Impact

A revised Wind Impact Assessment (**WIA**) has been prepared and is included at **Appendix O**. The assessment provides an analysis of the wind impact of the amended proposal following additional wind tunnel testing and includes quantitative evidence to support the conclusions of the qualitative Wind Impact Assessment submitted with the original SSD.

The revised WIA assessment considers the impact to public and private spaces and identifies comfort and wind safety conditions in pre- and post-development scenarios. It also includes appropriate mitigation measures to address any identified issues in pedestrian comfort or safety (where relevant).

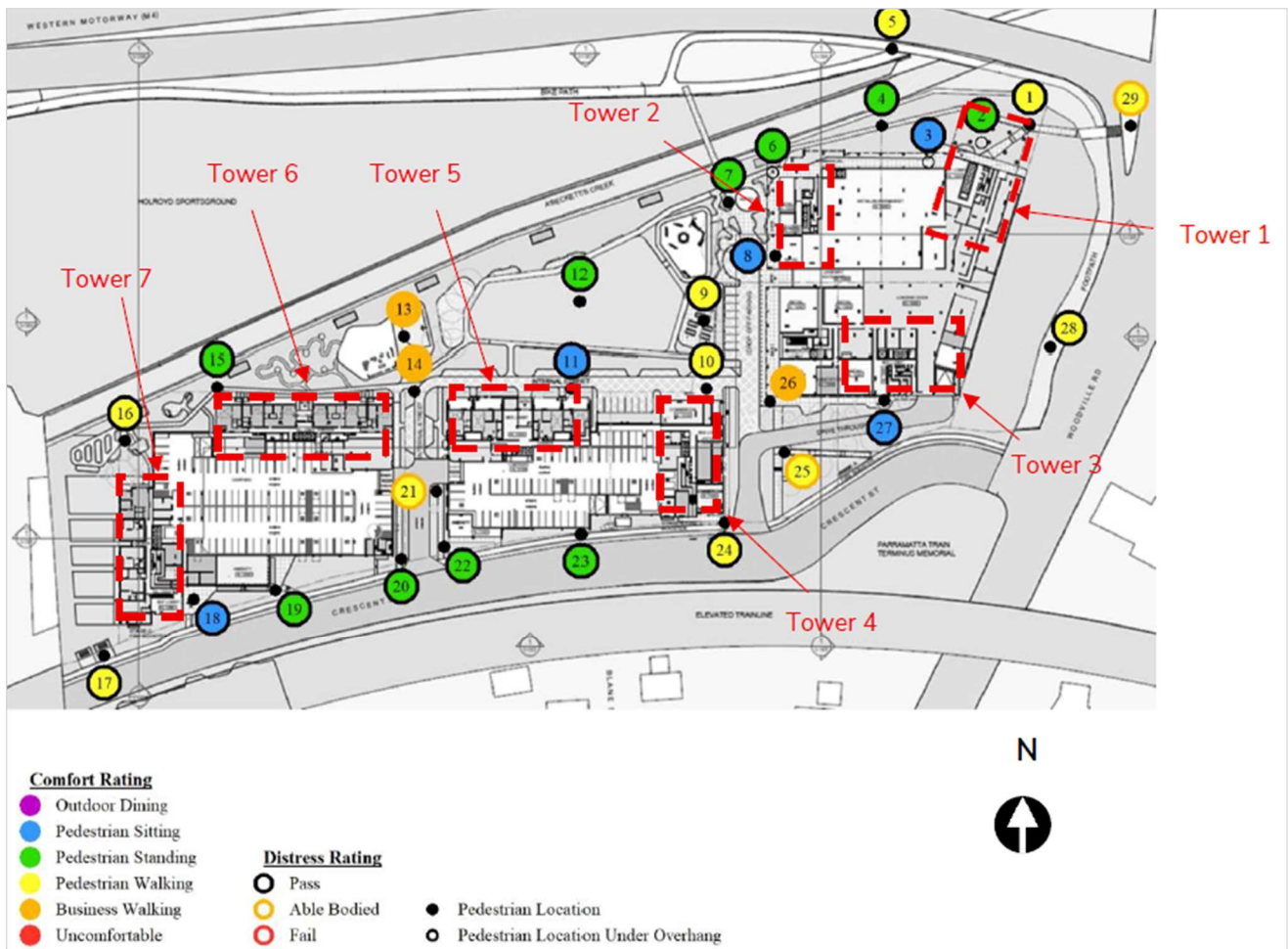
Analysis of the Amended Proposal (Wind Conditions and Impact on Comfort and Safety)

Ground Level

The comfort and distress ratings at ground level are presented in **Figure 24**. The wind modelling confirmed that the wind conditions at ground level are generally suitable for pedestrian sitting and pedestrian standing. However, stronger wind conditions are experienced around tower corners and gaps between podium stages, resulting in comfort ratings for pedestrian walking and business walking.

- Most locations around the site, including entrances and pedestrian pathways, are suitable for pedestrian sitting and pedestrian standing. Podium and entrance awnings help redirect downwash flow away from tower entrances.
- Gaps between podium stages (at Locations 9, 10, 13, 14, 21, and 24–26) experienced windier conditions with comfort ratings of pedestrian walking and business walking due to channelling of prevalent winds. Some locations exceed the safety/distress criteria with an able-bodied rating. However, wind conditions can be improved in these locations through the implementation of dense landscaping around these corners to break strong wind gusts, as well as extending corner awnings on the south-western corner of the podium in Stage A to redirect some downwash flows away from the ground level. This is set out in more detail in the mitigation measures below.

Figure 24 Pedestrian Wind Speed Measurement Locations with Comfort / Safety Ratings (Ground Level)



Podium Terrace

Wind conditions on the podium terraces were generally suitable for pedestrian standing and walking activities. However, one location near the lawn/outdoor gym area on the podium terrace within Stage A experienced stronger winds, resulting in a business walking comfort rating. Similarly, the area on the podium terrace within Stage B (between Buildings 4 and 5) exceeded the safety/distress criteria. Local mitigation measures are recommended to address this (see below).

Balconies

The wind conditions on the balconies were found to be generally suitable for outdoor dining and pedestrian standing activities. In general, harsher wind conditions are measured on the balconies facing north (at Locations 38 and 40) due to the relative exposure to the prevalent winds from the north-west. These locations have a comfort rating of pedestrian standing. Locations 39 and 41 experienced milder wind conditions with a comfort rating of outdoor dining.

Revised Mitigation Measures

The revised Wind Impact Assessment identified the following updated mitigation measures:

Ground Level

- Implement dense landscaping around corners to break strong wind gusts.
- Extend corner awnings on the south-west corner of the podium within Stage A to redirect downwash flows.
- Use small-scale screening structures or raised planters around the south-east area of the outdoor café seating area (at Location 9) to improve wind conditions.

Podium Level

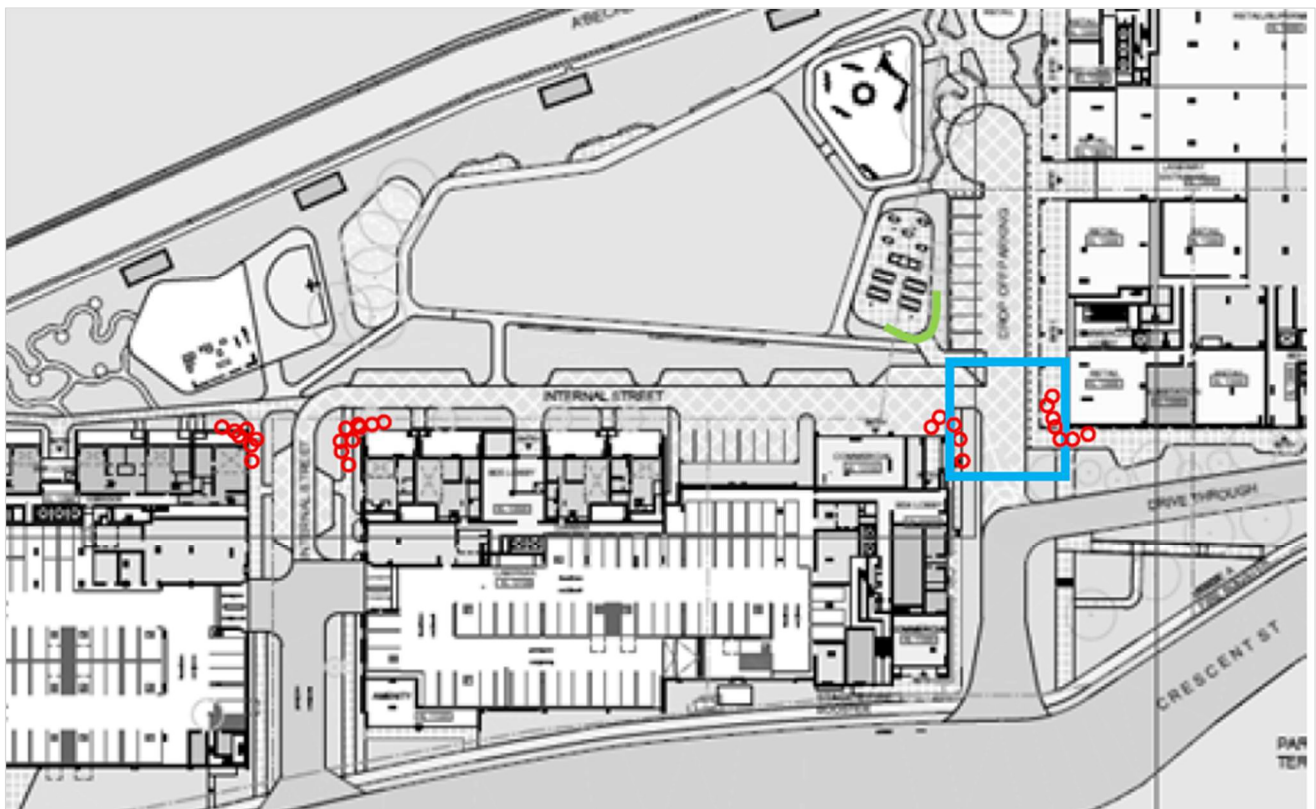
- Stage B (Buildings 4-5) – Raised planters and increased height of northern podium balustrades recommended.
- Stage C (Buildings 6-7) – Corner awnings connecting Buildings 6 and 7 suggested to redirect flow away from this location.

Balcony

- Increased the balustrade heights to approximately 1.8 metres in identified locations.

The location of these recommended mitigation measures are shown in **Figure 25** below. Refer to the revised Wind Impact Assessment included at **Appendix O** for further details.

Figure 25 Mitigation Measures – Dense Landscaping (Red), Extended Awnings (Blue) & Porous Screening / Raised Planters (Green)



Source: CPP Wind Engineering Consultants (2025)

4.1.3 Trees and Landscaping

4.1.3.1 Deep Soil Landscaping and General Landscaping

Revised Landscape Plans have been prepared and are included at **Appendix J**. The revised Landscape Plans demonstrate that the amended proposal significantly enhances the landscaping outcomes for the site when compared with the original SSD.

The provision of deep soil across the site has increased from 11,271 m² (29.7%) to 11,476 m² (30.3%), and the total landscaped area has also increased to 23,066 m² (60.9%). This represents a substantial increase in landscaped green coverage and open space across the site compared to the original SSD.

The key design refinements made to site-wide landscaping masterplan include:

- Consolidating car parking within building footprints, reducing exposed podium and hardstand areas.
- Minimising building footprints to allow greater ground plane permeability.
- Rationalising the landscape layout to create more contiguous deep soil zones for viable canopy tree growth.
- Replacing existing hardstand elements with soft landscaping and functional open spaces.
- Planting has increased across all rooftops to enhance microclimatic comfort and year-round use.

These refinements improve the quality, resilience and amenity of outdoor spaces while maintaining the original design intent of the landscape masterplan. The revised ground floor landscape masterplan and podium landscape masterplan are shown in the following figures.

Figure 26 Ground Floor Landscape Masterplan of Amended Proposal



Source: Arcadia (2025)

Figure 27 Podium Landscape Masterplan of Amended Proposal



Source: Arcadia (2025)

4.1.3.2 Tree Canopy

The revised landscape design introduces key improvements in tree canopy coverage, significantly enhancing the ecological benefits, and enhancing the visual and amenity offering of the site.

Key improvements to the amended proposal include increased tree canopy coverage, as follows:

- Removed tree canopy calculation – 4,197 m²
- **Total area of proposed (as amended) and existing retained tree canopy – 10,952 m²**

In comparison, the original SSD scheme proposed the following tree canopy coverage:

- Removed tree canopy calculation – 4,184 m²
- **Total area of proposed and retained existing tree canopy – 8,513 m²**

The extent of tree canopy coverage within the amended proposal is shown in the figure below.

These changes result in a net increase of 2,439 m² in tree canopy coverage, and represents a 6.4% increase in tree canopy coverage compared to the original SSD. The location of tree canopy coverage and shade has also been refined as part of the amended proposal to ensure shade cover is provided in appropriate locations, having regard to the location of proposed uses.

This substantial increase supports the overall urban tree canopy coverage goals set by Cumberland City Council and is consistent with the targets outlined in Council's *Urban Tree Strategy 2020* report. The enhanced tree canopy provides more shade, improves air quality, and contributes to a cooler, greener, and more resilient urban environment, demonstrating a strong commitment to sustainable urban development.

These measures collectively enhance the ecological and amenity performance of the precinct, align with the objectives of GANSW's *Greener Places (2020)* and ultimately achieve a cooler, greener, and more resilient public domain. Refer to the revised Landscape Plans at **Appendix J** for further details.

Figure 28 Revised Tree Canopy Coverage within the Amended Proposal



Source: Arcadia (2025)

4.1.3.3 Public and Private Open Space

Although there is a slight decrease in public open space compared to the original SSD, the revised landscape design significantly improves both the quantity and quality of communal open space at the ground level.

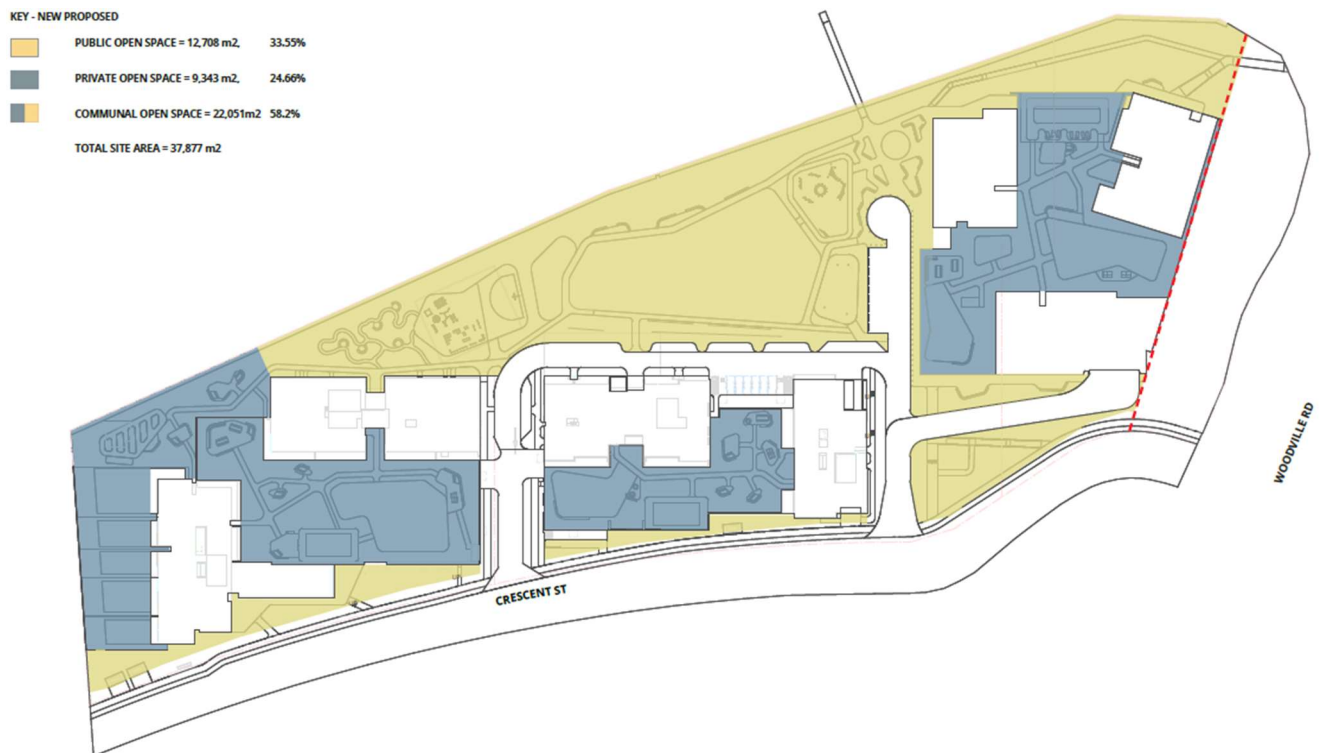
This enhancement is achieved through a more efficient site layout, realignment of pedestrian pathways, and strategic clustering of complementary uses. For example:

- The children's play space has been relocated closer to the retail frontages to improve accessibility, achieve improved alignment with key sight lines. This aims to increase the amenity of this space and also improve passive surveillance.
- The fitness area has also been repositioned within the former play space area to allow for better integration with active open space and adjacent rest zones, which seeks to improve usability for all age groups.
- The extent of communal open space on the podium rooftops within Stage B (Buildings 4-5) and Stage C (Buildings 6-7) has been increased compared to the original SSD. This enhances the overall amenity offering for residents, improve connectivity within the development, and allow for a greater diversity of passive and active recreational opportunities within larger, contiguous areas of open space.

The reconfiguration of the public domain strengthens activation and usability by grouping key program elements such as the communal lawn, all-ages play space, adult and senior fitness zones, shaded seating, and central shareway. These spaces are now more legible and accessible, encouraging all-day use and enhancing passive surveillance across the precinct.

These improvements create a more vibrant, functional, and secure environment for all users. The revised design of ground floor public open space and private open space within the amended proposal is shown in the following figure. Refer to the revised Landscape Plans at **Appendix J** for further details.

Figure 29 Amended Ground Floor Public Open Space and Private Open Space



Source: Arcadia (2025)

4.1.3.4 Tree Removal

A revised Arboricultural Impact Assessment (AIA) has been and is included at **Appendix K**. The revised AIA assesses the amended proposal and the anticipated potential impacts on trees. Based on the amended design, a total of 163 trees are considered “retention-incompatible”, five (5) are considered “retention-compatible” subject to mitigation measures, and three (3) trees are considered “retention-compatible”.

Without the removal of these trees, the delivery of the proposed development (and particularly the widening of Crescent Street) would be difficult to achieve. While the majority of subject trees are incompatible with the proposed design, the revised Landscape Plan demonstrates how over the medium to long term, offsetting the loss of these trees is able to be addressed through the proposed tree planting of 213 new trees.

With consideration to the existing canopy extent and tree removal required for the proposed development (as amended), the net gain in canopy across the site equates to approximately 5,565 m² (or an increase of 116%) compared to the original SSD which delivered a net gain of 3,713 m² (or an increase of 77%). These figures are based on the estimated spread at maturity as confirmed by the project’s landscape architect.

Revised Mitigation Measures

While the general protection measures outlined by AS4970-2025 are for all trees to be retained, the following mitigation measures were added for Trees 126, 127, and 12924, 12925 and 12927.

Tree 126 and 127

- TPZs to be fenced off at all times on the site-facing side of the TPZ, where drawn on the Tree Protection Plan (**TPP**) (Figure 7 within the revised AIA). While works are not occurring within the TPZ, and fencing must not be moved unless approved by the Project Arborist.
- All vehicles or machinery are to avoid the TPZ where possible. At a minimum, vehicles and machinery must not traverse on bare earth within the TPZ otherwise ground protection must be installed as shown in Figure 7 within the revised AIA.

- Explicit prohibition of the storage of materials, soil (such as from earthworks and for landscaping) or equipment within the TPZ at all times.

Tree 12924, 12925, and 12927

- There is an existing concrete culvert wall approximately on the boundary that separates this tree growing in the culvert and the site. It is assumed that the concrete culvert wall will remain during building works.
- It is also assumed and recommended that some type of erosion / sediment control fencing will be installed at the top of the wall prior to any earthworks. It is also assumed that the erosion / sediment control fencing will remain in place and be maintained for the entirety of the proposed works. Together with the concrete culvert wall, these will serve as tree protection fencing.
- Any branches from this tree growing into the site may be pruned under the supervision of the project arborist.

Refer to the revised AIA included **Appendix K** for further details.

4.1.4 Traffic, Transport and Accessibility

A revised Transport Impact Assessment (**TIA**) has been prepared and is included at **Appendix P**. The revised TIA assesses the anticipated transport implications of the amended proposal during operation of the proposed development.

4.1.4.1 Car Parking

The Housing SEPP car parking controls establish the minimum parking rates required for both affordable and non-affordable housing. In addition, Clause 6.21(4)(c) of the Cumberland LEP 2021 specifies maximum car parking rates for residential dwellings.

The Housing SEPP requires a minimum of 1,338 residential car parking spaces (excluding visitors). The Cumberland LEP 2021 requires a maximum of 1,957 (excluding visitor spaces). The amended proposal provides a total of 1,450 residential car parking spaces, (excluding visitor spaces). This represents a minor reduction from the original SSDA submission of 1,480 spaces.

With the Housing SEPP generating a minimum requirement of 1,325 residential car parking spaces, and the proposal providing a total of 1,450 residential car parking spaces (excluding visitor spaces), the difference in the provision of residential car parking on site compared to the minimum non-discretionary car parking rates set out within the Housing SEPP has been reduced to only 112 spaces (less than 10%).

The original SSD proposed residential car parking which exceeded the minimum non-discretionary car parking rates within the Housing SEPP by approximately 250 spaces (over 20%). Therefore, the provision of residential car parking within the amended proposal represents a significant reduction in residential car parking compared to the original SSD.

The amended proposal exceeds the minimum car parking requirements set out within the Housing SEPP and complies with the car parking rates set out within the Cumberland LEP 2021 by providing fewer than the maximum allowable spaces.

In terms of visitor parking the amended proposal has increased visitor parking from 15 to 24 spaces, equating to a ratio of 1 visitor space per 60 apartments. In addition:

- The site curtilage along Crescent Street can accommodate approximately 20 kerbside spaces, with no competing demand.
- 50 parking spaces will be allocated for retail use, available to the public on a short-stay basis, supporting both retail and visitor needs.

The amended proposal provides public parking for retail and at grade parking for the park land areas. Therefore, there will be a clear delineation between car parking for the residential component of the proposal and car parking for the retail and commercial uses. An additional 7 car spaces are not allocated to the

buildings but provide additional parking for the parklands. This on-street parking would not generate additional traffic and is insignificant to what has been assessed. Because the park is part of the integrated precinct, trips to the open space are assumed to be internal capture (i.e. made by people already on site or within walking distance). This balanced approach ensures compliance with the car parking requirements while accommodating the needs of residents and visitors.

4.1.4.2 Bicycle Parking and End of Trip Facilities

The amended proposal includes the provision of 872 bicycle parking spaces. This has increased by 158 parking spaces since the original SSD proposal, all of which will be located in dedicated secure areas within the podiums.

While this provision of bicycle parking is less than the DCP guidelines, it satisfies all residential, commercial, and retail bicycle space provisions with the shortfall only affecting visitor bicycle parking (which is expectedly subject to lower demand).

4.1.4.3 Access

The proposed driveways on Crescent Street are located approximately 100m west from Woodville Road and a second access 250m west from Woodville Road. Further analysis found that the eastern driveway has minimal impact on the road network and achieves adequate sight distances. The location of the driveway has been confirmed and is deemed to be acceptable and minimises the internal impacts of traffic. Refer to the revised Transport Impact Assessment at **Appendix P** for further details.

4.1.4.4 Car Park Design

Swept path analysis of the critical areas within the amended car park and loading areas has been conducted using design vehicles including Australian Standard 4.91m long B85 vehicle, 5.2m long B99 vehicle, and 12.5m long heavy rigid vehicle.

The Loading dock will now provide a turntable to assist with truck movements. The analysis found that the design vehicles will be able to circulate around the car park and access the service areas satisfactorily.

4.1.4.5 Traffic Generation

The amended proposal is expected to result in manageable operational traffic impacts. The quantum of traffic generated by the amended proposal is comparable to the original SSD. Therefore, the traffic modelling has not been updated, and the findings of the previous assessment remain valid for consideration of the road network implications of the amended proposal.

A shuttle bus would be provided as part of the travel demand management. The applicant is willing to accept a condition of consent for the building owners to fund the shuttle service in perpetuity (in a similar way to private garbage collection).

Revised Mitigation Measures

The revised TIA identifies the following additional mitigation measures:

- A loading dock management plan is recommended to reduce the impacts of noise and the potential for trucks to arrive when all loading bays are occupied.

Refer to the revised Transport Impact Assessment included at **Appendix P** for further details.

4.1.5 Noise and Vibration

A revised Noise and Vibration Impact Assessment (NVIA) has been prepared (included at **Appendix R**) which addresses feedback received within the submissions and evaluates the amended proposal in terms of impacts on noise and vibration. The NVIA concluded:

- Due to the development's proximity to the motorway and railway line, predicted noise levels are expected to exceed limits if windows/doors are open. Consequently, areas requiring alternative ventilation (mechanical) to meet NCC requirements are identified in Section 10.3 of **Appendix R**.

- Ground-borne noise from rail corridors was found to be within acceptable limits for shielded rooms, requiring no additional mitigation.
- Vibration measurements from passenger trains at the proposal's site boundary confirm compliance with the revised NVIA (refer to **Appendix R**) addresses submissions and evaluates the amended proposal. The NVIA concluded:
- The noise impact from surrounding roads and rail corridors was assessed using 3D acoustic modelling, considering environmental factors and regulatory guidelines. Both "windows closed" and "windows open" scenarios were evaluated to ensure compliance with internal noise limits and ventilation requirements, with necessary mitigation measures proposed. Due to the development's proximity to the motorway and railway line, predicted noise levels are expected to exceed limits if windows/doors are open. Consequently, areas requiring alternative ventilation (mechanical) to meet NCC requirements are identified in Section 10.3 and **Appendix C**.
- Ground-borne noise from rail corridors was found to be within acceptable limits for shielded rooms, requiring no additional mitigation.
- Vibration measurements from passenger trains at the proposal's site boundary confirm compliance with Australian Vibration and Noise Control Guidelines criteria, requiring no further mitigation.
- The noise assessment for Holroyd Sportsground indicates that predicted noise levels in apartment bedrooms facing the sportsground comply with internal noise targets, requiring no further mitigation.
- The traffic noise assessment shows that the proposed development will increase peak traffic noise on Walpole Street by less than 2dB(A), which is within acceptable limits and will not adversely impact surrounding residents.
- The noise assessment for the carpark and loading dock indicates that predicted noise levels at surrounding receiver catchments and adjacent apartment facades comply with project noise trigger levels, requiring no further mitigation.
- Future retail and commercial tenants will need to submit separate Development Applications considering hours of operation, number of occupants, outdoor uses, and amplified music to ensure noise impacts are mitigated.
- criteria, requiring no further mitigation.
- The noise assessment for Holroyd Sportsground indicates that predicted noise levels in apartment bedrooms facing the sportsground comply with internal noise targets, requiring no further mitigation.
- The traffic noise assessment shows that the proposed development will increase peak traffic noise on Walpole Street by less than 2dB(A), which is within acceptable limits and will not adversely impact surrounding residents.
- The noise assessment for the carpark and loading dock indicates that predicted noise levels at surrounding receiver catchments and adjacent apartment facades comply with project noise trigger levels, requiring no further mitigation.
- Future retail and commercial tenants will need to submit separate Development Applications considering hours of operation, number of occupants, outdoor uses, and amplified music to ensure noise impacts are mitigated.

Construction Noise

- The construction noise and vibration assessment considers civil and structural works, scheduled within standard hours, with noise mitigation measures such as solid hoardings in place, and equipment noise levels referenced from AS2436:2010.
- The noise modelling for construction activities, using SoundPLAN v9.0, predicts that noise levels during various construction stages will comply with established noise management levels, with no exceedances of highly noise-affected levels, assuming mitigation measures are implemented.

The mitigation measure outlined in Section 10 of the revised NVIA are consistent with the mitigation measures provided in the original NVIA report. Refer to the revised NVIA included at **Appendix R** for further details.

4.1.6 Contamination and Remediation

A revised Remediation Action Plan (**RAP**) has been prepared to address contamination risks identified through previous and recent investigations at 1 Crescent Street, Holroyd. The investigations confirmed risks associated with former landfilling in the north, landfill burial cells in the south, a raised fill mound in the west, possible underground chemical storage, and uncontrolled fill across the site.

The RAP sets clear objectives to address unacceptable risks to human health and the environment and ensure the site is suitable for the proposed development. The recommended strategy includes targeted excavation of high methane-generating soils, bulk excavation and preparation of surfaces to achieve a consistent capping layer, capping of asbestos-impacted soils, and installation of landfill gas mitigation systems to protect future buildings.

Given the staged nature of the development, the RAP provides for phase-specific Remediation Work Plans (**RWPs**) to be prepared, with associated unexpected finds and contingency procedures. Boundaries between completed and future stages will be sealed with temporary capping, and landfill gas mitigation systems will generally be delivered per stage. Validation testing, reporting and audit will also be undertaken progressively to align with the staged delivery of the proposed development. Refer to the revised RAP included at **Appendix GG** for further details.

4.2 Standard Assessment of Impacts

4.2.1 Visual Impact Assessment

A revised Visual Impact Assessment (**VIA**) has been prepared to assess the amended proposal and is provided at **Appendix HH**. The amended VIA analyses the visual effects of the amended built form on nearby sensitive visual receivers and public domain views from key locations surrounding the site.

Based on an assessment of the revised photomontages, the amended proposal is supported from a visual impact perspective. There will be no change to the sensitivity, magnitude and significance of the view from Viewpoints 1–5. This is demonstrated within the figures below.

In addition, the amended proposal will have an acceptable outcome from a visual impact perspective. The reasons for support remain consistent with the reasons provided with the original SSD, which include the following:

- The proposal is consistent with the desired future visual character of the precinct as envisaged by the planning framework.
- The proposal is compatible with the intent for the future of the primary visual catchment under the Parramatta Road Corridor Urban Transformation Strategy (**PRCUTS**).
- The proposal does not introduce a new, visually discordant element in the landscape, with higher rise buildings in the Parramatta CBD, Merrylands town centre, Granville local centre and Holroyd Gardens being already present in views from many locations in the visual catchment.
- The proposal will sit comfortably in the broader area characterised by groupings of taller buildings separated by lower rise, lower density areas.
- The proposal improves the visual amenity of the primary visual catchment, in particular representing a new precinct that defines and engages with adjoining public domain, including the Holroyd Sports Ground, Crescent Street and Woodville Road and incorporating measures such as trees and vegetation that mitigate the wide, highly trafficked visual character of Woodville Road and Parramatta Road.
- While being seen as a large new element in the landscape from the adjacent Holroyd Sports Ground, the location of the proposed new publicly accessible open space will complement the sports ground, and the proposal overall will create a new, well defined urban edge to the sports ground.

- The proposal minimises visual impact through incorporation of a range of primary measures that break up the scale and bulk of built form, including the location of the new public open space, variation in the footprint and height of buildings and separation between buildings.
- From residential areas to the north and south it will appear in the background as a visually cohesive grouping of well separated, taller buildings.
- The proposal does not impact any view corridors identified in planning instruments.
- The proposal provides visual interest through a range of measures, including variation in architectural detail, including materiality and colour.

Refer to the figures below for a comparison of the original SSD and the amended proposal in terms of visual impacts. Refer to the revised Visual Impact Assessment at **Appendix HH** for further details.

Figure 30 Viewpoint 1 – Holroyd Gardens – Image of Original SSD Development



Source: Ethos Urban (2025)

Figure 31 Viewpoint 1 – Holroyd Gardens – Image of Amended Proposal



Source: Ethos Urban (2025)

Figure 32 Viewpoint 2 – Holroyd Sportsground – Image of Original SSD Development



Source: Ethos Urban (2025)

Figure 33 Viewpoint 2 – Holroyd Sportsground – Image of Amended Proposal



Source: Ethos Urban (2025)

Figure 34 Viewpoint 3 – Intersection of Inkerman Street and Meehan Street – Image of Original SSD Development



Source: Ethos Urban (2025)

Figure 35 Viewpoint 3 – Intersection of Inkerman Street and Meehan Street – Image of Amended Proposal



Source: Ethos Urban (2025)

Figure 36 Viewpoint 4 – Railway Parade – Image of Original SSD Development



Source: Ethos Urban (2025)

Figure 37 Viewpoint 4 – Railway Parade – Image of Amended Proposal



Source: Ethos Urban (2025)

Figure 38 Viewpoint 5 – Woodville Road – Image of Original SSD Development



Source: Ethos Urban (2025)

Figure 39 Viewpoint 5 – Woodville Road – Image of Amended Proposal



Source: Ethos Urban (2025)

4.2.2 Flood Risk Assessment

The Flood Risk Assessment Cover Letter (included at **Appendix EE**) has been prepared to assess the amended plans and address comments received within submissions. The site is not considered to be at flood risk, with the exception of a minor area near Crescent Street which is considered Low Risk.

The 1% AEP flood is not shown to affect the site. Mapping indicates that the 1% AEP flow remains within the A'Becketts Creek channel. The overland flow depths along Crescent Street are typically contained within the roadway corridor and are not likely to encroach onto the site. Overland flows in a 1% AEP flood event do not affect the site.

The site is generally above the mapped PMF extent. It is not affected by a flood storage or floodway area, is not within any major overland flow paths, and is not subject to high hazard or high risk. No flood development controls apply with regard to finished floor levels given the negligible flood risk. Nonetheless, proposed building FFLs are all at or above the predicted maximum 1% AEP flood level.

A proposed bridge will be designed to span the A'Becketts Creek channel and therefore will not impact flood behaviour in events more frequent than and including the 1% AEP flood. As there are no predicted flood impacts caused by the proposed development, there will be no cumulative flood impacts. Refer to the Flood Risk Assessment Cover Letter included at **Appendix EE** for further details.

4.2.3 Water Management

The revised Stormwater Management Report (included at **Appendix DD**) has been prepared to assess the amended plans and address comments in the submissions by Council. This report outlines the methodology adopted and the associated results, including the requirement of a detention tank and the implementation of water-sensitive urban design.

The key differences between the previous design and the modified design are the rationalisation of the stage areas and the OSD tanks, clarity around the water quality elements, and detailed information provided on the OSD tank, section, and orifice.

The site has been designed to achieve all discharge and water quality targets independently without relying on any existing discharge or WSUD infrastructure. These items have been rationalised and redocumented for clarity with the council. As outlined in the stormwater management report, the following items have been identified:

- The site will drain to the adjacent creek through existing discharge locations.
- The site is not flood-affected.
- Detention tanks have been proposed for each stage, designed to meet UPRCT Site Storage Requirements.
- Each tank has been installed with two orifices to limit the total flow from the site to 102.7 L/s in the 20% event and 332.2 L/s in the 1% AEP event.
- Water-sensitive urban design is needed as part of the site's development. This has been achieved using proprietary products, including 20 OceanGuard units from Ocean Protect, 1 JF3300-29-5, and a separate chamber containing 4 x 690Psorb filters by Ocean Protect. These will need to be finalised and rationalised during detailed design based on final area calculations.

Refer to the revised Stormwater Management Report included at **Appendix DD** for further details.

4.2.4 Heritage Impact Assessment

The Heritage Impact Statement Letter addresses the amended proposal and is included at **Appendix II**. The proposed amendments will have no additional impact on heritage items in the vicinity of the site and, in some instances, will have a positive impact. The following points are noted within the Heritage Impact Cover Letter:

- Changing the footprints of buildings on the site will have no impact. Proposed setbacks with respect to nearby heritage items are generally retained.
- Replacing the proposed louvres for the carparks with green walls and mesh screening will improve the presentation of the podiums, positively impacting the general setting of any heritage items in the vicinity.
- Removing certain architectural elements reduces the height of Buildings 5, 6, and 7, eliminating the proposed height exceedances.

Reducing cut and fill and lowering the podium by one level in Stage A will positively impact by creating a more human scale to the podiums. Landscape screening of the amended podiums will similarly have a positive impact.

- The proposed changes in floor-to-floor levels will have no material impact on the overall height plane.
- The carpark redesign will have positive impacts, such as reducing the car parking podium height from 7 to 4 stores in the central and western precinct. This reduces perceptions of massing and scale at ground floor level.

Refer to the Heritage Impact Cover Letter at **Appendix II** for further details.

4.2.5 Waste Management

The amended Waste Management Plan (**WMP**) addresses the amended proposal and is provided in **Appendix Q**. The report anticipates 188,925 litres of residential waste per week. Recommended bin quantities and collection frequencies for the revised proposal are as follows:

- General Waste – 90 x 1100L MGBs, collected twice weekly.
- Recycling – 53 x 1100L MGBs, collected twice weekly.
- FOGO – 144 x 240L MGBs, collected weekly.

The revised WMP confirms a single general waste chute with space for two 240L bins per residential level. Bin rotation between chute discharge rooms and the bin collection room will occur periodically, addressing space constraints. Council will collect all residential bins according to its schedule, assuming waste and recycling are collected twice weekly and FOGO once weekly. Each building includes an area for bulk waste items.

For non-residential tenancies (excluding the supermarket which will be separately managed), the estimated waste generated requires:

- General Waste – 6 x 1100L MGBs, collected five times weekly (or ad-hoc).
- Recycling – 2 x 1100L MGBs, collected five times weekly (or ad-hoc).

A private waste collection contractor will service the non-residential bins per an agreed schedule.

The proposal provides best practice waste management, minimising waste generation and maximising reuse, ensuring efficient design, storage, and equipment for sustainable operations. Refer to the revised WMP at **Appendix Q** for further details.

4.2.6 BCA and Fire Safety

A revised BCA Compliance Report has been prepared and is included at **Appendix X**. The BCA report confirms that compliance can be achieved via performance solutions or amendments prior to the relevant Construction Certificate stage.

A Fire Safety has also been prepared (included at **Appendix Z**) which confirms that the proposed mixed-use residential development is considered to holistically achieve a suitable fire safety strategy, fire brigade intervention and achieve compliance with the BCA 2022 AMDT 2. It is anticipated that the fire safety

engineering assessment conducted as part of the relevant Construction Certification stage will achieve compliance with the respective Performance Requirements of the BCA.

4.2.7 Accessibility

A revised Accessibility Report has been prepared and is included at **Appendix Y**. The review of the amended proposal showed that the development is capable of complying with the relevant accessibility requirements at the detailed construction stage.

4.2.8 Air Quality

A revised Air Quality Impact Assessment (AQIA) is included at **Appendix CC**. The assessment analyses the air quality impact of the amended proposal on surrounding sensitive receivers.

The proposed design modification relocates the main residential areas on Level 7 of buildings 1 and 3 to Level 8, increasing the separation distance of the residential areas by 3.2m. This further reduces any potential air emissions from road traffic at these locations.

Todoroski Air Sciences confirm the assessment demonstrates that the proposed design modification would not result in any additional air quality impact and may reduce potential air emissions for the primary residential floor of buildings 1 and 3 along Woodville Road. Therefore, no additional mitigation and management measures are required for the site. Refer to the revised AQIA included at **Appendix CC** for further details.

4.2.9 Crime Prevention Through Environmental Design

A revised CPTED and Social Impact Assessment Cover Letter has been prepared and is included at **Appendix KK**. The amended proposal introduces several key changes aimed at enhancing safety, accessibility, and community interaction. Building masses have been reduced, and the ground floor RL has been lowered from RL 15 to RL 13 which improves the interface between the ground floor retail / commercial uses and the adjacent areas of open space, whilst also enhancing passive surveillance.

Car parking areas in Buildings 4 and 5 are now connected to the commercial lobbies which enhances access (although requires improved lighting and wayfinding due to concealed corridors). The communal podium space has been relocated to Level 4, with recommendations for permeable fencing to support surveillance.

The public park remains central, with improved sightlines and new community gardens fostering social interaction. The amenity space now interfaces with Crescent Street, featuring a stepped-back façade and additional lighting, with potential for residential-only activities to activate the area. The north-east corner's lobby entrance has been moved, reducing activation opportunities, necessitating enhanced lighting and surveillance measures.

Overall, the geometric design and low-maintenance landscaping across the site aim to improve sightlines, pedestrian flow, and social interaction, creating a safer and more vibrant community environment.

4.2.10 Biodiversity Development Assessment Report

A revised BDAR has been prepared and is included at **Appendix N**. The amended proposal will require the complete clearing of 0.44 hectares of vegetation from the following Vegetation Zones, in addition to areas of Planted Native Vegetation and exotic vegetation:

- 0.35 hectares of Vegetation Zone 1: PCT 3320 (Canopy)
- 0.09 hectares of Vegetation Zone 2: PCT 3320 (Regenerating Stems)

The affected areas are identified in the figure below.

This is a reduction of 0.22 hectares from the original proposal which was clearing of 0.66 hectares of vegetation from Vegetation Zones including Cumberland Shale Plains Woodland (Canopy) and Exotic Vegetation.

A total of four ecosystem credits is required to offset the biodiversity impacts of the proposed development. There are no prescribed impacts requiring additional mitigation. Refer to the revised BDAR included at **Appendix N** for further details.

Figure 40 BDAR Impact Summary



Source: Narla Environmental (2025)

4.3 Other Assessments

The following technical assessments have been revised to reflect the amended proposal. However, the previous assessment of impacts and mitigation measures outlined in the original SSD has not changed:

- Ecologically Sustainable Development
- Aboriginal Cultural Heritage
- Community Housing Provider Letter
- Archaeological Technical Report
- Infrastructure Delivery Management and Staging Plan
- BASIX Certificate and NatHERS
- Social Impact Assessment
- Connecting with Country Framework
- Construction Management Plan

It is noted that no changes were required to the following technical reports to reflect the amended proposal:

- Acid Sulfate Soil Management Plan
- Hazardous Materials Survey
- SEARs reference table
- Engagement summary table
- Mitigation measures
- Geotechnical Assessment
- Landfill Gas Assessment
- Detailed Site Investigation
- Preliminary LTEMP
- Engagement Report
- Nabers Agreement
- Net Zero Statement

5

Justification of Amended Project

5 Justification of Amended Project

This section of the report provides a comprehensive evaluation of the amended proposal having regard to its economic, environmental and social impacts, including the principles of ecologically sustainable development.

It assesses the potential benefits and impacts of the proposed amendments, considering the interaction between the findings in the detailed assessments and the compliance of the proposal within the relevant controls and policies.

5.1 Project Design

The amended proposal has been thoughtfully designed to avoid or minimise the impact of the project. Key actions include a net reduction in car parking and an increase in bicycle parking to promote sustainable transport. The overall height, bulk, and scale have been reduced, including smaller building footprints, to lessen visual impact. The proposal also increases the provision of affordable housing, with 220 units managed by a Community Housing Provider (CHP). Improved connectivity at the ground floor ensures better alignment between retail and commercial uses and the public domain. Enhanced street interfaces, more activated facades, and refined materiality contribute to a vibrant streetscape. Efficient space planning has led to the redistribution of floor space through refined building layouts. The quality of communal open space, particularly for Stages B and C, has been improved, and there is an increase in the overall provision of deep soil and tree canopy coverage. These design improvements ensure the proposal continues to deliver on the strategic objective of providing 1,374 apartments while enhancing the overall urban environment.

5.2 Strategic Context

This amendment report has demonstrated that the amended proposal is consistent with the strategic framework and has been considered against key Government and Council documents including the following:

- National Housing Accord
- Greater Sydney Region Plan: A Metropolis of Three Cities
- Our Greater Sydney 2056: Central City District Plan
- Cumberland 2030: Local Strategic Planning Statement
- Cumberland Local Housing Strategy
- Woodville Road Corridor Planning Proposal

The proposal is consistent with the State and local strategic planning policies. Consistency is achieved through the provision of housing as the proposal seeks to provide 1,374 apartments, of which 220 will be affordable housing managed by a CHP. Upon delivery, the proposal will assist in providing 10% of the homes Council is required to deliver under the National Housing Accord.

5.3 Statutory Context

The relevant State and local environmental planning instruments are outlined in **Section 4** and assessed in detail within **Appendix B**. The assessment concludes that the amended proposal complies with the relevant provisions within the relevant instruments as summarised below:

- The proposed development has been assessed and designed to satisfy the relevant objectives of the EP&A Act.
- Consideration is given to the relevant matters for consideration as required under the BC Act. A BDAR has been provided to support the proposed development.

- State agency referrals will be required to support the approval of this SSDA.
- The proposed development generally satisfies the relevant provisions of the Cumberland LEP 2021 and the Housing SEPP, notwithstanding the proposed height and FSR variations that are noted below.
- Sufficient environmental planning grounds have been established for the proposed height and FSR variations within the Clause 4.6 Variation Requests at **Appendix U** and **Appendix V**. The assessment that has been provided by each Clause 4.6 Variation Request has not been reproduced within this report to avoid the unnecessary duplication of text.

5.4 Consultation

As set out in **Part 1** of this report, feedback received during the public exhibition period has informed the design refinements made to the proposal. Consultation feedback received during the assessment of the amended application will continue to be considered. A detailed breakdown of submissions and response can be found at **Appendix A**.

5.5 Likely Impacts of the Proposal

The amended proposal has been assessed considering the potential environmental, economic and social impacts as outlined below:

- **Natural Environment** – The proposed amendments address the principles of ecologically sustainable development (ESD) in accordance with the requirements of the Environmental Planning and Assessment Regulation 2000 (EP&A Regulation) and as outlined below:
 - Precautionary principle: the precautionary principle relates to uncertainty around potential environmental impacts and where a threat of serious or irreversible environmental damage exists, lack of scientific certainty should not be a reason for preventing measures to prevent environmental degradation.
 - The amended proposal attempts to incorporate adaptability and resilience into the project design through the implementation of environmental management and the innovative sustainability initiatives.
 - This report has not identified any serious threats of environmental damage that cannot be adequately mitigated or addressed based on current scientific standards and best practices. In this regard, the proposed development can be considered generally consistent with the precautionary principle.
 - Intergenerational equity: the needs of future generations are considered in decision making and that environmental values are maintained or improved for the benefit of future generations by.
 - Providing new diverse housing and affordable housing opportunities during the operational phases.
 - Providing new local employment opportunities during the construction and operational phases.
 - Conservation of biological diversity and ecological integrity: As demonstrated throughout the Amendment Report, the proposed development will not result in any significant impacts on biological and ecological integrity of surrounding land, subject to the implementation of mitigation measures. The planting of native vegetation will facilitate a development that will conserve and support local ecological diversity and integrity.
 - Improved valuation, pricing and incentive mechanisms: this requires the holistic consideration of environmental resources that may be affected as a result of the development including air, water and the biological realm. It places a high importance on the economic cost to environmental impacts and places a value on waste generation and environmental degradation.

- The development will not have any unacceptable impacts on the natural environment in relation to air quality, water quality or waste management. The effects of the development will be acceptable and managed accordingly by the proposed mitigation measures as required.
- Overall, the amended proposal will not have any unacceptable impacts on the natural environment. The revised ESD report (**Appendix AA**) identifies sustainability measures including energy savings, energy efficiency and waste minimisation.
- **Built Environment** – The amended proposal has been designed to respond to the precinct, key agency feedback and neighbouring landowners. This ensures that the proposal aligns with the overall vision for Crescent Parkland and can be developed considering access and staging of adjacent development.
- **Social** – The amended proposal will have positive social impacts as it will contribute to affordable and market housing in close proximity to key centres and transport hubs and create employment generation. It will also increase public land and parklands. The proposal will increase social cohesion, create a sense of community, deliver on key social infrastructure, and provide an improved way of life through the enhanced public domain and pedestrian experience on the site.
- **Economic** – The Project has significant economic impacts, in the short term, the construction of the development will create demand for 366 jobs per annum over during construction and an additional significant number of jobs (321) during the operational phase within the retail and commercial areas of the proposal.

The potential impacts can be mitigated, minimised or managed through the measures summarised in **Appendix C** to this Amendment Report.

5.6 Suitability of the Site

The site remains highly suitable for the proposed development (as amended) for the following reasons:

- **Strategic Housing Intent:** The proposal aligns with the strategic intent to increase housing supply in key locations, particularly those near major transport nodes.
- **Mixed-Use Benefits:** The development offers a mix of uses that will support population growth for both residents and workers in a strategic area. This reinforces Cumberland LGA's role as a residential community and stimulates a competitive employment market by creating a more active and attractive precinct.
- **High-Quality Housing:** The proposal delivers high-quality housing at a key site, enhancing housing stability and diversity in Holroyd. It includes 15% affordable housing within a mixed-use development.
- **Zoning Consistency:** The proposal is consistent with the objectives of the Mixed-Use zone, and the proposed land uses are permissible with consent on the site.
- **Public Domain:** The development provides a significant quantum of green open space, connecting the site to the green network across Holroyd and optimising amenity for residents and visitors. A total of 12,708 m² of public open space and 11,476 m² of deep soil are being provided.

5.7 Public Interest

The development as proposed to be amended is considered in the public interest for the following reasons:

- **Site Renewal:** It will facilitate the renewal of a vacant contaminated site within close proximity of a strategic centre, benefiting from its proximity to critical transport and social infrastructure.
- **Integrated Mixed-Use Development:** It provides an integrated mixed-use building in a location ideally suited to support such a development.

- **Employment Opportunities:** The proposed development will generate a significant number of full-time positions within the commercial and retail areas. It will establish a viable commercial presence on the site, meeting the future needs of residents and workers throughout the precinct.
- **Streetscape Enhancement:** It will enhance and activate the streetscape through high-quality architecture and landscaping.
- **Central Park and Green Corridor:** The proposal includes a new central park designed with amenities that complement the surrounding Holroyd Sports Ground and Parramatta Train Terminus Memorial Park. This park will serve as a green corridor, linking the existing parks and providing a welcoming and attractive space for residents and visitors.
- **New affordable and market Apartments:** 1,374 apartments, of which 220 will be affordable housing managed by a CHP. Leveraging the accessible location and proximity to services and existing and train networks with direct connections to major employment destinations.

Having considered all relevant matters, we conclude the development as proposed to be amended is appropriate for the site and approval is recommended.

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