



## **Response to Submissions**

State Significant Development  
Application SSD-81300458

Residential Flat Buildings  
85-91 Thomas Street, Parramatta

Submitted to Department of Planning,  
Housing & Infrastructure

On behalf of NSW Housing Corporation P/L

17 October 2025

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# 1. Executive Summary

## 1.1. Introduction

This report relates to State Significant Development Application (SSDA) 81300458 which proposes, in summary, a Residential Flat Building at 85-91 Thomas Street, Parramatta. The purpose of the report is to provide a response to matters raised during the public exhibition of the proposal which was undertaken by the NSW Department of Planning, Housing and Infrastructure (DPHI) between 29 July 2025 and 25 August 2025.

The report is prepared on behalf of the proponent, NSW Housing Corporation P/L. It is prepared in accordance with DPHI's 'State significant guidelines – preparing submissions report', dated March 2024.

## 1.2. Summary of Submissions

The following table provides a summary of the submissions. Section 2 of this report considers the submissions in detail, including relevant response and, where relevant, amendments to the proposal in light of matters raised in any submissions.

Table 1: Summary of Submissions

Total received	46
Nature of submissions	<ul style="list-style-type: none"> <li>▪ Supportive – 10</li> <li>▪ Objection – 32</li> <li>▪ Comment – 3</li> </ul>
Source of submissions	<ul style="list-style-type: none"> <li>▪ Individual – 43</li> <li>▪ Public agency – 3</li> </ul>
Issues raised (note – the following is a summary of the issues raised and not intended to itemise each submission).	<ul style="list-style-type: none"> <li>▪ Excessive bulk and scale – 15</li> <li>▪ Inappropriate urban design – 8</li> <li>▪ Traffic congestion and safety – 22</li> <li>▪ Inconsistent with existing planning controls - 10</li> <li>▪ Inconvenience during construction – 4</li> <li>▪ Overshadowing – 11</li> <li>▪ Inadequate onsite parking – 4</li> <li>▪ Change in character – 8</li> <li>▪ Privacy impacts - 8</li> <li>▪ Impacts to land values - 5</li> <li>▪ Inadequate essential infrastructure – 3</li> <li>▪ Inadequate social infrastructure – 9</li> <li>▪ Mechanism to dedicate land – 1</li> </ul>

	<ul style="list-style-type: none"> <li>▪ Impact on coastal saltmarsh – 2</li> <li>▪ Improves housing affordability – 4</li> <li>▪ Reinforces vitality and activation – 6</li> <li>▪ Site contamination – 2</li> <li>▪ Kerbside waste collection - 4</li> <li>▪ Impact of and to flooding – 1</li> <li>▪ Inconsistent with previous town planning history – 3</li> <li>▪ Biodiversity impacts – 4</li> <li>▪ Improvements to housing supply – 5</li> <li>▪ Inappropriate planning pathway – 7</li> <li>▪ Inappropriate dwelling composition – 1</li> <li>▪ Not supported by adequate public transport – 1</li> <li>▪ Proposal is permissible - 2</li> <li>▪ Site contamination – 1</li> <li>▪ Lift serviceability – 1</li> </ul>
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### 1.3. Summary of Concept Amendments in Response to Submissions

#### Waste Bin Storage Area and Waste Collection

The primary amendment made to the proposal following the exhibition period is the relocation of the waste storage area from ground level, to within the basement. Subsequently, the proposal will no longer rely on kerbside waste collection, instead, waste vehicles will enter the basement and collect waste accordingly. The area which previously contained the waste storage area is now proposed to contain further landscaping, including deep soil landscaping. Any traffic related impacts associated with the former kerbside waste collection method, although minor, will not be avoided given waste vehicles will enter the site entirely.

#### Lift Serviceability

In their submission, the NSW DPHI stated that the proposal should include an extra lift per building envelope (i.e. a minimum of 2 lifts per envelope). This was for the purpose of improving accessibility in general, particularly in the event one lift fails or is not readily accessible should a residential be 'moving in or out' of one of the proposed dwellings. This was considered valid during the public submissions review process. Subsequently, the floor plan for each envelope has been amended to include 2 lifts per envelope.

#### Dwelling Yield and Mix

As a consequence of relocating the waste storage facilities to within the basement, and adding extra lifts, some changes were made to the originally proposed dwelling yield and mix. In summary, whereas as the originally submitted proposal included a total of 126 dwellings, the amended proposal now includes 125 dwellings. The following table outlines changes to the proposed dwelling mix in response to submissions:

Table 2: Comparison of proposed and amended dwelling mix

	Originally Submitted	As Amended
<b>Studio</b>	6	6
<b>1 bedroom</b>	16	30
<b>2 bedroom</b>	69	50
<b>3 bedroom</b>	35	39

### Parking

Relocating the waste storage facilities within the basement, and accommodating the subsequent service vehicles within the basement, has resulted in changes to the basement generally. The predominant change has been a reduction in parking from the originally proposed 188 onsite car spaces, to 177 onsite spaces. These provisions still remain compliant with the parking standards as provided in State Environmental Planning Policy (Housing) 2021 (Housing SEPP).

## **1.4. Summary of Further Responses to Submissions**

The following is a summary of the proposal's response to what are considered to be primary issues raised in public submissions, as categorised by the number of submissions to issues. It is not intended to be a comprehensive response to all submissions. Reference can be made to Section 3 of this report for a response to each issue. Such responses are generally provided on the basis that the original design was generally adequate, and the issues raised did not warrant any or major amendments to the proposal's design or character.

### Amenity Related Impacts

It is acknowledged that numerous submissions raised concerns in relation to potential amenity impacts such as overshadowing, solar access, noise and the like. These are addressed in detail in the Environmental Impact Statement (EIS) originally submitted with the SSDA.

In summary, however, it is noted that the proposal has been found to comply with Chapter 4 – Design of Residential Apartment Development within State Environmental Planning Policy (Housing) 2021 (Housing SEPP), and the recommendations within the associated Apartment Design Guide (ADG). In particular, the EIS demonstrates that the proposal complies with the ADG's recommendations for solar access to the proposal itself as well as adjoining properties. Consistency with the ADG's recommendation for privacy was also demonstrated.

Noise impacts are likely to occur during any construction phase of the proposal. Such impacts would be temporary only, however. Nevertheless, such impacts were found to be consistent with guidelines and standards relating to construction phases, as determined in the Acoustic Assessment prepared by Renzo Tonin & Associates submitted as part of the original EIS.

### Traffic Impacts

The Traffic Impact Assessment (TIA) originally submitted with the EIS, prepared by Genesis Traffic, reference number 25093, dated 20 June 2025, concluded that the proposal would not result in any unreasonable traffic related impacts. The TIA noted that the proposal's parking provisions was greater than the minimum required by the Guide to Traffic Impact Assessment (GTIA). This was an intentional mitigation measures, largely for the purpose of minimising on street park by residents of the proposal given some on street parking already occurs along Thomas Street. It is noted that the NSW Department of Planning, Housing and Infrastructure (DPHI) has

requested a reduction in onsite parking for the proposal in line with the minimum parking rates outlined in the GTIA. This has not been adopted, largely as a result of accommodating the waste bins and associated service vehicle within the basement. As a result, onsite parking has reduced from the originally proposed 188 onsite spaces, to 177 spaces.

As indicated earlier, the proposal has been amended such that the originally proposed kerbside waste collection will now occur entirely onsite, within the proposal's basement. Whilst the TIA determined that the development as originally proposed would not result in any unreasonable traffic related impacts, the conversion to onsite waste collection will lessen traffic impact even further.

#### Inappropriate Planning Pathway

It is acknowledged that the proposal is not lodged with the City of Parramatta Council for assessment and/or determination. The site and proposal were declared a 'State Significant Development' by the NSW Minister for Planning and Public Spaces on 17 February 2025. This renders the proposal as State Significant Development in conjunction with the correspondence State Environmental Planning Policy (Planning Systems) 2021.

Subsequently, the proposal is required to be lodged to, assessed by, and determined by DPHI. In this case, the SSDA pathway is an appropriate statutory pathway for assessment of the proposal.

#### Biodiversity Impacts

The EIS confirmed that the proposal would not result in any unreasonable biodiversity impacts, largely because the proposal's footprint was a substantial distance from any sensitive vegetation and the adjoining river foreshore. Further, the NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW) issued a Biodiversity Development Assessment Report (BDAR) waiver for the proposal. In issuing the waiver, the DCCEEW stated that the proposal "*is not likely to have any significant impact on biodiversity values*". On this basis, the proposal is not likely to result in any unreasonable biodiversity related impacts. Conversely, the proposal is likely to improve biodiversity as the application includes a vegetation management plan which requires improvements to the quality of vegetation in the vicinity of the adjoining foreshore.

#### Bulk, Scale, Height & Urban Design

It is acknowledged that the proposal exceeds the height of building and floor space ratio (FSR) development standards nominated for the site according to the Parramatta Local Environmental Plan 2023 (PLEP 2023).

The height and FSR included in the proposal is consistent with the previously mentioned State Significant Development Order applicable to the site. The proposal has been designed by a registered architect and has been found to satisfy the recommendations of the ADG, in particular those relating to articulation and context.

The SSDA includes a concurrent rezoning proposal which reflects the height and FSR included within the architectural plans prepared by PTI. It is noted that the subject site is within land use zone R4 – High Density Residential according to the PLEP 2023. In this regard, a high-density residential development of one form or another is highly likely to take place on the subject site, as well as along the remainder of Thomas Street, according to the local statutory planning provisions. On this basis, it is considered that the proposal is suitable with regard to height, bulk, scale and urban design.

#### Housing Supply & Affordability

The proposal would increase housing supply and, therefore, assist with improving housing affordability which is a key priority of the current NSW government in light of the current housing crisis. In addition to the proposal's overall increase in housing supply, 16 of the proposed dwellings will be provided for 'affordable housing' purposes, as defined in the *Environmental Planning & Assessment Act, 1979 (as amended)*, for a period of 10 years. Such dwellings would be managed by a Community Housing Provider. This further improves the proposal's contribution to housing affordability. On this basis, the proposal will assist with addressing the housing crisis, will improve overall housing supply, and will increase the quantity of affordable housing.

## **1.5. Conclusion**

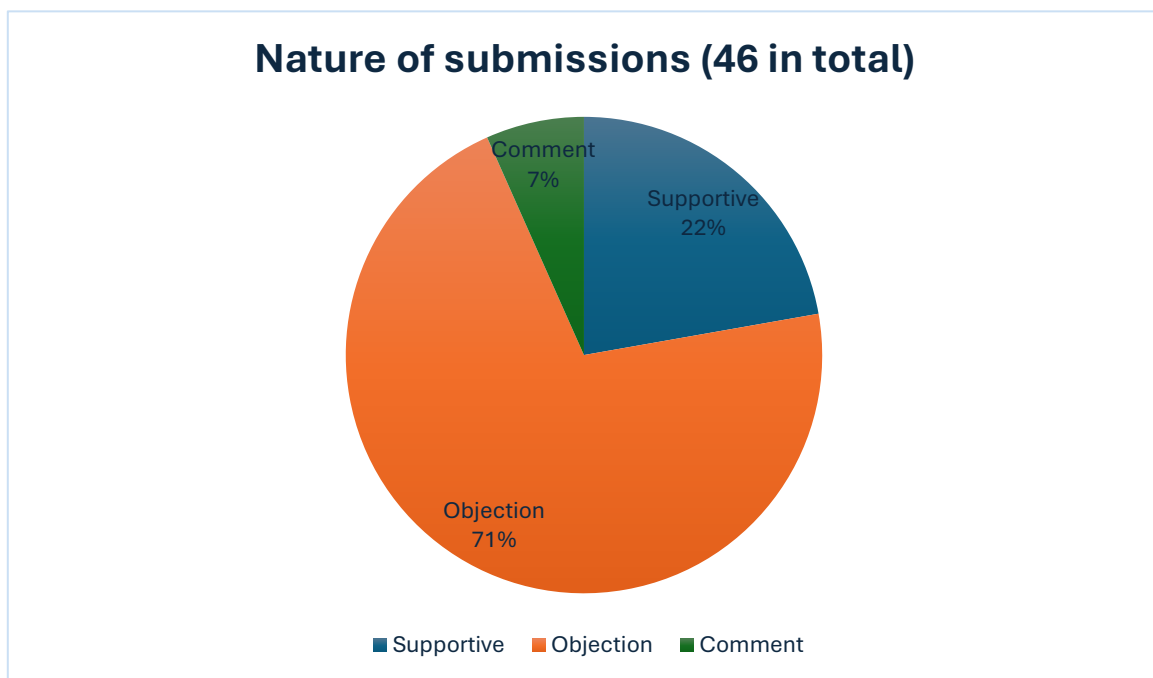
The submissions lodged to the proposal have been analysed in detail. The submissions did not warrant significant changes to the proposal's objectives, justification, design or character. Nevertheless, some design changes were warranted, such as the addition of an additional lift per envelope, minor reduction in onsite parking spaces, and reduction in dwelling yield from 126 to 125 and associated amendments to dwelling mix. A further design change has been the relocation of the waste bin storage from ground level to within the basement, which results in kerbside waste collection being converted to onsite waste collection.

In light of the above, the proposal is considered to be without any unreasonable environmental impacts. Conversely, the proposal's increase to housing supply and increase in affordable housing, is considered to be a positive social impact. Subsequently, the proposal is considered to be in the public interest. The corresponding concurrent rezoning is similarly considered to be reasonable. Therefore, it is considered that the proposal warrants development consent and associated rezoning.

## 2. Analysis of Submissions

### 2.1. Number & Nature of Submissions

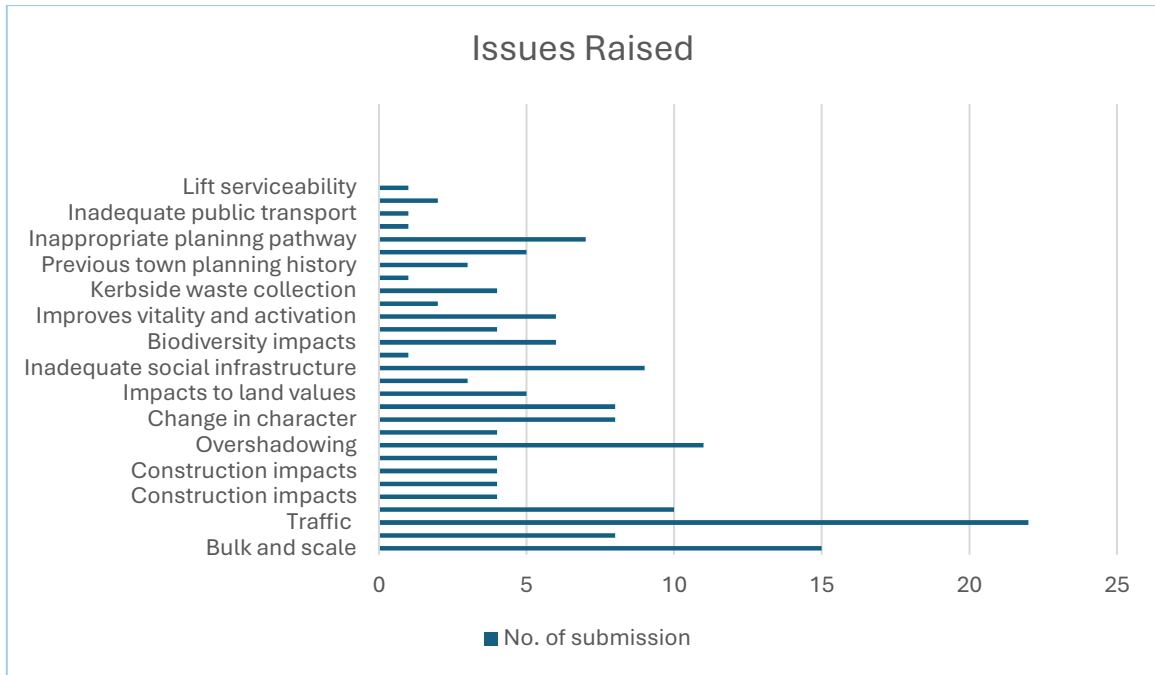
A total of 46 submissions were received from the general public and public agencies. 43 submissions were received from individuals, and 3 were received from public agencies. The nature of the submissions is outlined below.



### 2.2. Identification & Categorisation of Issues

#### 2.2.1. Identification of Issues

The following table itemises the issues raised in the submissions. Bulk and scale, urban design, traffic impacts, inconsistency with the local planning framework, overshadowing, supporting infrastructure, change in character and planning pathway are the most prevalent issues raised in opposition to the proposal. Improvements to public domain vitality and activation, improvements to housing supply and improvements to affordable housing supply were the main issues raised in support of the proposal.



### 3. Response to Submissions

#### Waste Bin Storage Area and Waste Collection

*Issue:* Submissions from the public and DPHI raised concern with the visual impact associated with waste bins which the application as submitted proposed to store at ground level, between the proposed envelope and the western side boundary. Similarly, submissions raised concerns with safety issues arising from waste collection vehicles emptying waste bins from within the Thomas Street road reserve. Such submissions were provided by individuals, the City of Parramatta Council as well as DPHI.

*Response:* The EIS confirmed, with input from the project architect as well as traffic engineers Genesis Traffic, that the originally proposed location and collection of waste was suitable. Nevertheless, the proponent has agreed to relocate all waste storage facilities to within the basement. Subsequently, waste collection will occur entirely onsite, specifically, within the proposed basement.

In order to accommodate the relevant waste vehicle within the proposed basement, the basement ramp head height is increased from 3.5m to between 4m and 4.5m. The increase in head height clearance was achieved largely by deleting 1 dwelling and relocate some other floor space. This also ensures that the originally proposed maximum height of 30m, as part of the concurrent rezoning, does not change.

#### Materials and Finishes

*Issue:* Submissions raised concern in relation to the general architecture of the proposal, as well as proposed materials and finishes. Such submissions were received from members of the public and the NSW Government Architect (GA).

*Response:* The materials and finishes proposed are considered to be suitable. They are used regularly throughout the industry, largely because they are durable and easy to maintain. Painted precast concrete in particular is relatively convenient to renew.

The materials used are varied and create a suitable degree of variability and visual interest. The proposal includes various setbacks which also assists with creating suitable architectural presentation.

#### Fire Boosters

*Issue:* DPHI sought clarity in relation to the location of fire boosters.

*Response:* Fire booster has been allowed for along the Thomas Street boundary. The project's fire engineers have indicated that such facilities must be as close as possible to the front boundary to enable preferred emergency services responses. To ensure an appropriate streetscape presentation, the same materiality adopted for the proposal's front fence will also be applied to the fire booster cabinetry.

#### Utility Infrastructure

*Issue:* DPHI and Endeavour Energy (EE) sought confirmation in relation to utilities available to the site, the extent of any augmentation and whether any augmentation would impact the proposal's architecture.

*Response:* Electrical engineering consultancy, iingen, were engaged to advise on electricity utility provisions. Their advice confirms that one kiosk only is required. The kiosk has been allowed for in the north western corner of the subject site. Landscaping is proposed accordingly.

Natural Light to Communal Open Space (CoS)

*Issue:* DPHI queried whether the amenity of the proposal’s internal open space was suitable as there was an assumption that such space was not provided with natural light.

*Response:* Whilst the internal CoS is within the lower ground, over head sky lights were included to enable natural light entry, as shown in the following extract of the architectural plans.

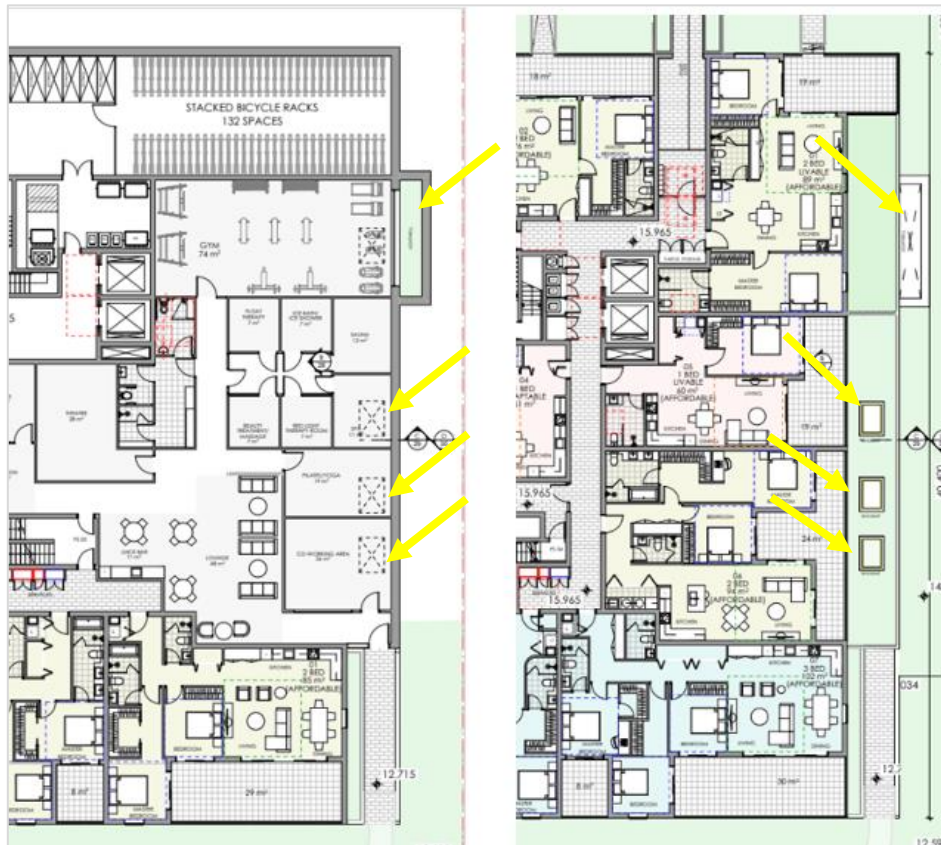


Figure 1: Extract of lower ground and ground floor plan with skylight to internal CoS shown with yellow arrow (Source: PTI/PPUD)

Air Conditioning Units

*Issue:* DPHI queried whether ample space had been provided for air conditioning units.

*Response:* Ample space exists within each balcony to accommodate air conditioning condensers, which would be screened by the balcony balustrade.

Direct Access to/from Street to Ground Level Dwellings

*Issue:* DPHI suggested whether direct pedestrian access could be allowed for between the street and the proposals ground floor dwellings.

*Response:* The ground floor has been amended to enable direct access from the street to each ground floor dwelling adjacent to the front boundary. A communal lobby is still provided to enable access to the remainder of the dwellings.

Groundwater

*Issue:* The Department of Climate Change, Environment, Energy & Water (DCCEEW) sought additional sub surface testing to confirm the suitability of the proposal’s basement.

*Response:* The subject site has already received development consent for a multi level basement. Geotechnical investigations, undertaken by Morrow Geotechnics, was included in the EIS stating that the site was suitable for the proposal in relation to geotechnical conditions. Morrow Geotechnics has provided further advice stating that the likelihood of any impacts arising from the proposal due to geotechnical conditions was highly unlikely. In this regard, it is considered that this issue is not valid. However, should DPHI consider that further investigations are necessary, they can be required as a conditions of any consent.

#### Strata Subdivision

*Issue:* DPHI requested detailed strata subdivision plans given the proposal also seeks such subdivision.

*Response:* Strata subdivision plans can be provided as a condition of any consent.

#### Rezoning

*Issue:* The concurrent rezoning request submitted with the SSDA sought rezoning by adding a site specific clause within Section 7 of the PLEP 2023. DPHI provides that this may not be suitable given Section 7 relates to land within the Parramatta CBD.

*Response:* It is noted that Section 6 of the PLEP 2023 also has provisions for site specific land uses, developments and the like. The proponent would not have an objection to rely on Section 6 of the PLEP 2023.

#### Community Housing Provider

*Issue:* DPHI stated that evidence of an agreement between the proponent and a community housing provider to manage the proposal's affordable housing floor space should be provided, in order to satisfy Section 26 of the Environmental Planning & Assessment Regulation (2000) (EP&A Regs).

*Response:* Section 26 of the EP&A Regs specifically relates to In-Fill Affordable Housing as provided by Chapter 2 of the Housing SEPP. The proposal, however, is for 'HDA housing'. Therefore, this section would not apply to the proposal. Moreover, there is still some time before the proposal is constructed and operational. The proponent is entitled to consider a variety of providers before committing right at this time. The proponent is committed to engaging a CHP, however. It is suggested that the requirement for a CHP should be demonstrated prior to the issue of any Occupation Certificate, as a condition of any consent.

#### Basement Detailed Design

*Issue:* DPHI raised numerous detailed design related queries in relation to the basement, such as the provision of a wash bay, EV charging provisions, compliance with AS2890.3-2015 in relation to bicycle parking, and the like.

*Response:* The proposal has been amended to include a wash bay, allowance in the form of conduits and the like can be made for in relation to EV charging, whilst the intended bicycle parking infrastructure provider ('Five at Heart'), has confirmed compliance with AS2890.3-2015.

#### Contamination

*Issue:* The City of Parramatta Council queried whether adequate assessment in relation to contamination has been provided. This was raised as the SSDA proposal seeks a slightly varied basement compared to that approved as part of the Development Application submitted to Parramatta Council, and subsequently approved by the regional panel.

*Response:* The originally submitted EIS provided a preliminary site investigation stating that the site is suitable for the proposal. Further, consent has already been issued by the regional panel for a basement at the site. The likelihood of contamination being located any deeper than the depth considered as part of the earlier DA is highly unlikely. This RTS concludes that the proposal is suitable for the proposal with regard to contamination in particular.

### Mechanism for Dedication of Land

*Issue:* The SSDA as submitted proposed to dedicate 1,161m<sup>2</sup> of land at the rear of 85 Thomas Street to the City of Parramatta Council. This land is currently zoned RE1 – Public Recreation according to the PLEP 2023. In this regard, it is considered reasonable to dedicate land to Council at no cost. In their submission, the City of Parramatta Council sought clarification as to how such land would be dedicated to Council.

*Response:* The land in question could be dedicated as part of a condition of any Development Consent. Any consent is legally binding and the proponent would be obliged to comply. Any condition could require the dedication prior to the issue of any Occupation Certificate. As it is proposed to dedicate the land at no cost, any relevant local contributions should be discounted by the value of the land proposed to be dedicated.

### Universal Access

*Issue:* The City of Parramatta Council sought confirmation that the proposal's floor plans achieve universal access.

*Response:* Universal access is a typical consideration by architects during this design phase. Such requirements have already been factored into the proposal.

### Lift Serviceability

*Issue:* In their submission, the NSW DPHI stated that the proposal should include an extra lift per building envelope (i.e. a minimum of 2 lifts per envelope). This was for the purpose of improving accessibility in general, particularly in the event one lift fails or is not readily accessible should a resident be 'moving in or out' of one of the proposed dwellings.

*Response:* This was considered valid during the public submissions review process. Subsequently, the floor plan for each envelope has been amended to include 2 lifts per envelope (refer to Figure 3).

### Amenity Related Impacts

*Issue:* It is acknowledged that numerous submissions raised concerns in relation to potential amenity impacts such as overshadowing, solar access, noise and the like. These are addressed in detail in the Environmental Impact Statement (EIS) originally submitted with the SSDA.

*Response:* In summary, however, it is noted that the proposal has been found to comply with Chapter 4 – Design of Residential Apartment Development within State Environmental Planning Policy (Housing) 2021 (Housing SEPP), and the recommendations within the associated Apartment Design Guide (ADG). In particular, the EIS demonstrates that the proposal complies with the ADG's recommendations for solar access to the proposal itself as well as adjoining properties. Consistency with the ADG's recommendation for privacy was also demonstrated.

Noise impacts are likely to occur during any construction phase of the proposal. Such impacts would be temporary only, however. Nevertheless, such impacts were found to be consistent with guidelines and standards relating to construction phases, as determined in the Acoustic Assessment prepared by Renzo Tonin & Associates.

### Traffic Impacts

*Issue:* The Traffic Impact Assessment (TIA) originally submitted with the EIS, prepared by Genesis Traffic, reference number 25093, dated 20 June 2025, concluded that the proposal would not result in any unreasonable traffic related impacts. The TIA noted that the proposal's parking provisions was greater than the minimum required by the Guide to Traffic Impact Assessment (GTIA). This was an intentional mitigation measure, largely for the purpose of minimising on street parking by residents of the proposal given some on street parking already occurs along Thomas Street. It is noted that the NSW Department of Planning, Housing and Infrastructure (DPHI) has requested a reduction in on site parking for the proposal in line with the minimum parking rates outlined in the GTIA. Parking has been reduced from the original proposed 188 to 177 onsite spaces, largely as a result of

accommodating waste storage and waste collection within the basement. The amended 177 onsite parking spaces still exceeds the minimum prescribed by the Housing SEPP, however, this is considered to be a necessary mitigation measures in light of existing onstreet parking along Thomas Street.

As indicated earlier, the proposal has been amended such that the originally proposed kerbside waste collection will now occur entirely onsite, within the proposal's basement. Whilst the TIA determined that the development as originally proposed would not result in any unreasonable traffic related impacts, the conversion to onsite waste collection will lessen traffic impact even further.

#### Inappropriate Planning Pathway

*Issue:* It is acknowledged that the proposal is not lodged with the City of Parramatta Council for assessment and/or determination. The site and proposal were declared a 'State Significant Development' by the NSW Minister for Planning and Public Spaces on 17 February 2025. This renders the proposal as State Significant Development in conjunction with the correspondence State Environmental Planning Policy (Planning Systems) 2021. Subsequently, the proposal is required to be lodged to, assessed by, and determined by DPHI. In this case, the SSDA pathway is an appropriate statutory pathway for assessment of the proposal.

#### Biodiversity Impacts

*Issue:* The EIS confirmed that the proposal would not result in any unreasonable biodiversity impacts, largely because the proposal's footprint was a substantial distance from any sensitive vegetation and the adjoining river foreshore. Further, the NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW) issued a Biodiversity Development Assessment Report (BDAR) waiver for the proposal. In issuing the waiver, the DCCEEW stated that the proposal "*is not likely to have any significant impact on biodiversity values*". On this basis, the proposal is not likely to result in any unreasonable biodiversity related impacts. Conversely, the proposal is likely to improve biodiversity as the application includes a vegetation management plan which requires improvements to the quality of vegetation in the vicinity of the adjoining foreshore.

#### Bulk, Scale, Height & Urban Design

*Issue:* It is acknowledged that the proposal exceeds the height of building and floor space ratio (FSR) development standards nominated for the site according to the Parramatta Local Environmental Plan 2021 (PLEP 2021).

The height and FSR included in the proposal is consistent with the previously mentioned State Significant Development Order applicable to the site. The proposal has been designed by a registered architect and has been found to satisfy the recommendations of the ADG, in particular those relating to articulation and context.

The SSDA includes a concurrent rezoning proposal which reflects the height and FSR included within the architectural plans prepared by PTI. It is noted that the subject site is within land use zone R On this basis, it is considered that the proposal is suitable with regard to height, bulk, scale and urban design.

#### Housing Supply & Affordability

*Issue:* The proposal would increase housing supply and, therefore, assist with improving housing affordability which is a key priority of the current NSW government in light of the current housing crisis. In addition to the proposal's overall increase in housing supply, 16 of the proposed dwellings will be provided for 'affordable housing' purposes, as defined in the *Environmental Planning & Assessment Act, 1979 (as amended)*, for a period of 10 years. Such dwellings would be managed by a Community Housing Provider. This further improves the proposal's contribution to housing affordability. On this basis, the proposal will assist with addressing the housing crisis, will improve overall housing supply, and will increase the quantity of affordable housing.

### Activation and Vitality

*Issue:* Several submissions stated that the proposal is likely to improve activation and vitality within the public domain in particular, largely as a result of the proposal's built form nature and active living spaces overlooking public areas such as Thomas Street.

*Response:* This RTS agrees with the matter raised. The proposal would enhance and activate key public areas such as the Thomas Street road reserve, as well as improve casual surveillance.

### Inadequate Social Infrastructure

*Issue:* Submissions stated that the locality would not be able to provide the necessary social infrastructure, such as parks and the like, to accommodate any increase in demand arising from the proposal.

*Response:* It is considered that there is ample social infrastructure in the immediate vicinity of the subject site, namely along the Parramatta River foreshore. In addition, the proposal offers to dedicate a large portion of the subject site to Council for passive recreation purposes, thereby increasing the quantity of public open space.

Lastly, the proposal itself includes a substantial amount of passive and active recreation areas including a pool, gym, yoga room, roof top communal areas, kid's playground and the like. In effect, the proposal largely addresses its own social infrastructure demands.

### Impacts to Land Values

*Issue:* Various submissions stated that the proposal would reduce land values due to the proposal's density and its affordable housing component.

*Response:* The subject site is currently zoned R4 – High Density Residential according to the PLEP 2023. Therefore, a residential apartment building development can occur on the subject site, and along most of the remainder of Thomas Street, irrespective of this proposal. Given the proposal, if constructed, would offer new built form in a visually interesting manner, it is considered that the proposal would not decrease land values. This is especially the case considering existing development at the site is arguably outdated.

### Overshadowing

*Issue:* Submissions raised concern in relation to shadows from the proposal impacting solar access to existing or likely dwellings on immediately adjoining properties.

*Response:* The proposal as originally submitted, and as amended, allows for at least 2 hours of solar access to existing and likely living rooms on adjoining allotments on June 21. This satisfies the Apartment Design Guide and, therefore, overshadowing is not considered to be an ongoing issue.

### Construction Noise, Dust & Traffic Impacts

*Issue:* Noise, dust and traffic arising from any construction process was raised as a concern in various submissions.

*Response:* It is acknowledged that the proposal is likely to create some impacts during any construction process. These impacts would be temporary, however. In addition, the EIS included several management plans to lessen any such impacts. This includes construction noise, dust and traffic management plans.

## 4. Actions Taken Since Exhibition

### 4.1.1. Project Amendments

A number of key amendments have been made to the proposal as a result of matters raised in submissions from the public as well as agencies. These changes are outlined below.

#### Relocated Waste Storage & Amended Waste Collection

The application as originally submitted included waste storage facilities in the north western corner of the site's ground floor. Subsequently, kerb side waste collection was proposed.

All waste storage is now proposed within the basement. Waste collection would, therefore, take place entirely within the proposal's basement. These revisions have been reviewed and endorsed by the project traffic engineer, Genesis Traffic.

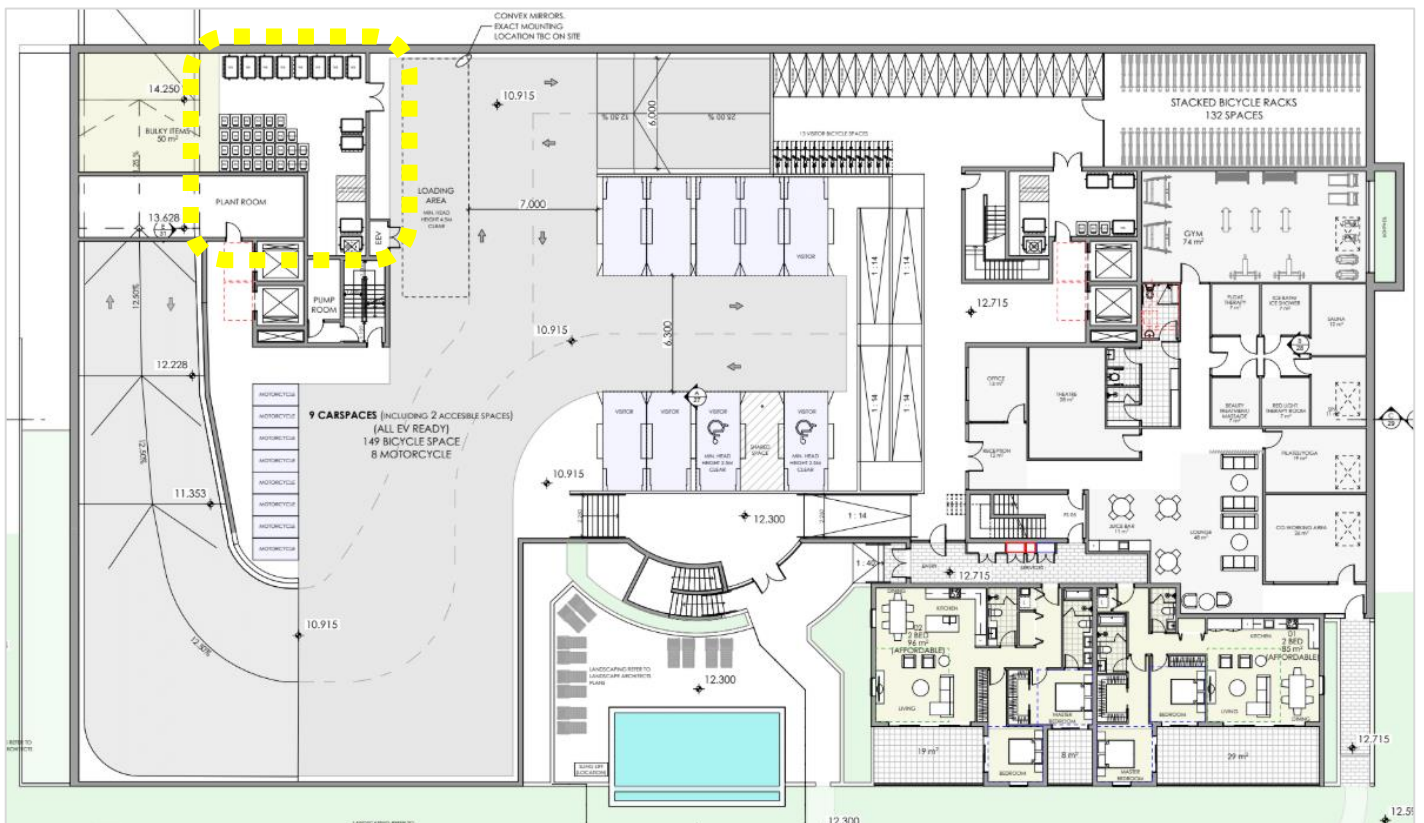


Figure 2: Extract of basement/lower ground floor plan with new location of waste storage facilities outlined yellow (Source: PTI/PPUD)

#### Additional Lifts

The proposal as originally submitted included one lift per envelope. In response to comments made from DPHI, additional lifts have now been included. Each envelope now includes two lifts as demonstrated in the following plan extract.



Figure 3: Amended typical floor plan with 2 lifts per envelope outlined yellow (Source: PTI/PPUD)

### Dwelling Yield and Mix

Relocating the waste storage facilities from the ground floor to within the lower ground floor/basement, has necessitated a higher clearance at the basement entry, as well as a longer ramp in order to accommodate the necessary waste vehicles within the basement. This has impact volume above within the envelope, resulting in some loss of floor space. Similarly, habitable floor space has been reduced as a result of adding two new lifts. Overall, dwelling yield decreases by 1 compared to the scheme as originally submitted (i.e. 126 dwellings down to 125 dwellings). This has also necessitated a change in the proposal’s dwelling mix, as demonstrated in the following table.

Table 3: Comparison of proposed and amended dwelling mix

	Originally Submitted	As Amended
<b>Studio</b>	6	6
<b>1 bedroom</b>	16	30
<b>2 bedroom</b>	69	50
<b>3 bedroom</b>	35	39

## 5. Updated Project Justification

This RTS has assessed the amended proposal in accordance with the relevant statutory and strategic framework, as well as the potential environmental impacts in accordance with the SEARs, any accompanying mitigation measures as outlined in the original Environmental Impact Statement, as well submissions received during the proposal's public exhibition. Having regard to the environmental, social and economic considerations of the project, the development is considered justified for the following reasons:

- In accordance with the City of Parramatta Local Housing Strategy 2020, the proposed development will deliver much needed housing, including affordable housing on an underutilised site in a highly accessible and well serviced location.
- The proposal aligns with the strategic objectives for the area, including the Greater Sydney Region Plan – A Metropolis of Three Cities and the Central City District Plan.
- The residential units have been carefully designed to maximise future occupier's amenity, with all dwellings achieving the recommended standards set out within the Apartment Design Guide. The development will also deliver a significant level of high quality, communal open space.
- The proposal would function efficiently and safely, particularly given ample lifts are included and waste collection occurs onsite.
- The assessment of the proposal has demonstrated that the development will not result in any unreasonable environmental impacts that cannot be appropriately mitigated or managed.
- The proposal is suitable in its context which is zoned R4 high density residential and includes emerging high density residential development.
- The development is permissible and consistent with the relevant planning controls for the site.
- The proposal's offer to dedicate land to Council, would increase the locality's passive recreation open space.
- The proposal is consistent with the principles of ecological sustainable development as defined by Section 193 of the *Environmental Planning and Assessment Regulation 2021*.

## 6. Conclusion

The submissions lodged to the proposal have been analysed in detail. The submissions did not warrant significant changes to the proposal's objectives, justification, design or character. Nevertheless, some design changes were warranted, such as the addition of an additional lift per envelope, minor reduction in onsite parking spaces, and reduction in dwelling yield from 126 to 125 and associated amendments to dwelling mix. A further design change has been the relocation of the waste bin storage from ground level to within the basement, which results in kerbside waste collection being converted to onsite waste collection.

In light of the above, the proposal is considered to be without any unreasonable environmental impacts. Conversely, the proposal's increase to housing supply and increase in affordable housing, is considered to be a positive social impact. Subsequently, the proposal is considered to be in the public interest. The corresponding concurrent rezoning is similarly considered to be reasonable. Therefore, it is considered that the proposal warrants development consent and associated rezoning.



**PRINCIPLE**

PLANNING + URBAN DESIGN