

Appendix C – Response to Submissions Table (SSD-79791208)

DPHI Key Matters

Table 1 DPHI Key Matters

Key Issues	Response
Approved Concept Plan	
<p>Consent was granted for a concept proposal on the site on 26 April 2024 (SSD-49808717). The current State significant development (SSD) relies on Section 4.24(4) of the <i>Environmental Planning and Assessment Act 1979</i> (EP&A Act), where a development application (DA) may be inconsistent with a concept consent subject to a condition requiring the modification or surrender of the concept consent. In this instance, the application requests a condition to modify the concept consent under Section 4.17(b) of the EP&A Act.</p> <p>Noting this, provide further detailed assessment of the proposal against the conditions of the concept consent (revising Appendix SS of the EIS), to specifically confirm if the proposal satisfies existing conditions or where the application is seeking to modify a condition under Section 4.17(b) of the EP&A Act. If the latter, please propose recommended amendments to the condition for the Department’s consideration.</p>	<p>The Stage 1 SSDA Development Consent Conditions Response Table provided at Appendix RR submitted with the EIS has been updated to provide a detailed assessment each condition and request modifications to the following conditions under Section 4.17(b) of the EP&A Act:</p> <ul style="list-style-type: none"> • Condition A2 – Terms of Consent • Condition A7 – Land Use • Condition A9 – Concept Approval • Condition A17 – Gross Floor Area Control • Condition C19 – Environmental Performance • Condition C44 – Waste <p>For further detail, refer to the Revised Stage 1 SSDA Conditions Table at Appendix D and Section 3.2.2 of the Submissions and Amendments Report.</p>
Protecting residential amenity	
<p>Consistent with Condition A7 (Land Use) of the concept consent and as noted by Council’s submission and at the Design Integrity Panel (DIP) meeting in September 2025, the Department requires further assessment and justification of the proposed BTR building within the approved commercial envelope, having specific regard to potential privacy impacts and building separation in accordance with the Apartment Design Guide (ADG) (including the ability for future neighbouring developments to address the ADG requirements should residential floor space be contemplated). In particular, provide:</p> <ol style="list-style-type: none"> a. an alternate ‘test’ scheme for the eastern tower that adopts the numerical building separation distances in the ADG (both internal and external distances), 	<p>As detailed within the Addendum Architectural Design Report prepared by SJB at Appendix F, a comparative assessment of the proposed SSDA scheme, and an ADG consistent scheme has been undertaken to determine the difference in residential amenity impacts.</p> <p>The analysis confirms that the ADG test scheme delivers no material improvement in amenity for future residents of the development or for surrounding buildings for the reasons as summarised below:</p> <ul style="list-style-type: none"> • The extent of overshadowing is only marginally reduced, resulting in a minor 2.6% - 5.1% increase in solar access to some facades of the adjacent sites.

Key Issues	Response
<p>including the removal of the chamfer suggested by Council and the DIP, and consideration of the issue below regarding 2-10 Valentine Avenue</p> <p>b. comparison of the resident and neighbouring amenity achieved by the proposed scheme with the ADG 'test' scheme, including consideration of strengths and weaknesses</p> <p>c. evidence of exploration and / or incorporation of revisions made to the proposed scheme where the ADG 'test' scheme achieves greater amenity.</p>	<ul style="list-style-type: none"> Increased building separation does not generate any additional visual privacy benefits, as equivalent outcomes are achieved through careful and considered façade design and planning. The minor improvement in internal solar access arising from the increase setbacks does not result in a noticeable amenity improvement for residents. <p>Accordingly, there is little to no benefit in adopting greater building separations. Rather, doing so would result in a demonstrably poorer outcome by generating significant adverse impacts on built form and urban design quality, while also resulting in a loss of 152 dwellings in the eastern tower (including 12 affordable dwellings). Such an outcome would undermine the objectives of the proposal and be inconsistent with key strategic planning objectives, particularly the delivery of high-quality housing within a well-located and accessible area.</p> <p>For these reasons, as further detailed in Section 4.1 of the Submissions and Amendment Report, the proposed scheme represents the superior outcome and amendments to the building separations are not warranted in this instance.</p>
2-10 Valentine Avenue, Parramatta	
<p>Secretary's Environmental Assessment Requirements (SEARs) have been issued for the proposed change of use (with alternations and additions) of the existing commercial building at 2-10 Valentine Avenue to co-living housing (concurrent SSD and rezoning proposal SSD-90243456). The existing commercial office is immediately adjacent to the site's eastern boundary, approximately 7.5m from the approved commercial envelope proposed for BTR.</p> <p>While SSD-90243456 is yet to be assessed and determined, the Department requests an analysis of implications of the proposal to potential future co-living housing adjacent to the site (as per the SEARs request) with respect to the ADG recommended building separation for privacy.</p>	<p>An assessment of the potential impact to 2-10 Valentine Avenue was undertaken as part of the comparative design analysis within the Addendum Architectural Design Report at Appendix F. The redevelopment analysis for 2-10 Valentine Avenue undertaken as part of the Stage 1 Concept SSDA assumed that any future redevelopment would be within the existing commercial building envelope, which is consistent with the site's potential future use for co-living housing in accordance with the current SEARs. On this basis, the assumptions and findings of the original analysis, which informed the building envelope design, remain valid.</p> <p>Notwithstanding, as detailed within Section 4.1 of the Submissions and Amendment Report, increasing the eastern setback to 12m to 2-10 Valentine Avenue would yield negligible additional privacy benefits for either development. This is as the proposed scheme appropriately manages privacy impacts through considered façade articulation and controlled openings, with only two screened high-level windows proposed on the eastern façade.</p>

Key Issues	Response
Adaptable, liveable, affordable and NDIS housing	
<p>The location of the NDIS housing (and carer apartments) is not clear. These are proposed as adaptable apartments; however, the proposed number of adaptable apartments differs from the proposed number of NDIS apartments. Clearly identify the number and location of the NDIS housing, carer apartments and adaptable apartments on the proposed plans.</p> <p>The affordable apartments are located on the lower levels, being 7 to 11. Provide further consideration and justification of the proposed location of the affordable apartments, especially in terms of amenity when compared to dwellings at upper levels.</p> <p>Alongside the proposed provision of 61 adaptable apartments, 18 accessible parking spaces are proposed. Clarify the adequacy, management and allocation of accessible parking.</p> <p>Given the total number of adaptable apartments to be delivered from the outset for general BTR residents is likely to be allocated to NDIS and carer residents, the Department requests further consideration given to the total number of adaptable apartments provided from the outset. In addition, the Department requests further clarification from the operator with respect to how and when any adaptable apartments not allocated (and adapted) prior to construction will be adapted in response to any potential tenant request.</p> <p>Provide further justification to support the proposed number of liveable apartments (61), which is considerably less than 20% recommended by the ADG (141 apartments).</p>	<p>A detailed response to the Department’s comments regarding adaptable, liveable, affordable and NDIS housing is provided within Section 4.8 of the Submissions and Amendments Report. In summary, the following responses are provided:</p> <ul style="list-style-type: none"> • The proposal comprises a total of 61 adaptable apartments, which are located within the western tower. Of the total amount, 50 (including 5 carer apartments) are proposed as Special Disability Accommodation (SDA) to be operated under the NDIS. SJB have provided additional architectural drawings to illustrate the pre- and post-adaptable layouts of the relevant apartments, which is provided within the Addendum Architectural Design Report at Appendix F. • 50 affordable apartments are proposed to be located between Levels 6 and 11 of the eastern tower. Despite their location within the lower levels of the tower, it is emphasised the apartments receive a high level of residential amenity, particularly as 60% of the affordable apartments will be naturally ventilated and 70% of the apartments will receive solar access for 2 hours. • The proposed development comprises 21 accessible parking spaces, which does not provide an accessible space for every adaptable unit. However, as confirmed by MyLife (refer to Appendix U), the provision of 18 accessible spaces, 32 standard spaces and 1 additional space for carer apartments is sufficient to meet their operation requirements. • Whilst the proposed development does not incorporate the recommended 20% of liveable apartments, the design and operational approach of the adaptable apartments exceed the minimum requirements of the ADG. Rather than solely incorporating LHG silver level features, the proposal integrates NDIS SDA design standards to accommodate occupants with higher care needs, representing a more substantial commitment to equitable and universal access, therefore directly achieving Objective 4Q-1 of the ADG. <p>Refer to Section 4.0 of the Submissions and Amendments Report for a more detailed assessment of the relevant matters.</p>
Environmental Performance	
<p>Condition C19 of the concept consent requires specific minimum environmental standards to be met in the proposal, such as in relation to Green Star rating. The Applicant responds that: ‘...the proposed development achieves a high level of sustainability’ and ‘The minimum environmental standards stipulated in this condition were provided in the context of a commercial office development, opposed to a hotel proposal’. Provide further</p>	<p>As detailed within the Sustainability Statement prepared by E-LAB at Appendix M, Condition C19 of the Stage 1 Concept SSDA is required to be amended to reflect the change of uses of the development, including the removal of commercial office, and the provision of hotel accommodation. The amendment to Condition C19 is further detailed within the Revised Stage 1 SSDA Conditions Table provided at Appendix D.</p>

Key Issues	Response
<p>information to demonstrate that the proposal will achieve these minimum requirements of the concept consent.</p>	
<p>Wind and reflectivity</p>	
<p>Demonstrate that the mitigation measures recommended in the Pedestrian Wind Study at Appendix Q of the EIS have been incorporated into the proposal.</p> <p>Demonstrate that the mitigation measures recommended in the Solar Reflection Analysis at Appendix R of the EIS have been incorporated into the proposal.</p>	<p>As detailed within the Addendum Architectural Design Report at Appendix F, the mitigation measures outlined in both the Pedestrian Wind Study and Solar Reflection Analysis have been incorporated into the design. Specifically, the design incorporates the mitigation measures by:</p> <ul style="list-style-type: none"> • Wind: <ul style="list-style-type: none"> - Incorporating dense landscaping along the north-eastern perimeter of the Level 6 communal space in the form of planter beds. - Locating seating areas on Level 6 towards the south of the space, which will be protected by significant landscaped planters. - Incorporating protective edge planters (1m high) onto the perimeter of each of the tower top communal spaces, including Level 40 of the western tower. • Reflectivity: <ul style="list-style-type: none"> - Low reflectivity glass (glass with 13% reflectivity or lower) will be incorporated in areas identified by RWDI, including the internal face of the eastern façade of the western tower, and a small portion of the podium along Argyle Street. <p>SJB have labelled the implementation of these mitigation measures within the Updated Architectural Drawings at Appendix E.</p>
<p>Mechanical noise</p>	
<p>The EIS states <i>'The design has not progressed enough for mechanical plant or equipment selections to be made, therefore, during the design development stage of the project, the mitigation measures summarised in Appendix C should be considered when preparing the mechanical services'</i>. Provide a letter from a suitably qualified engineer certifying that the proposed mechanical plant is adequate to serve the development, including confirmation of the size and location of the mechanical plant and potential noise impacts and mitigation measures for future residents.</p>	<p>Neuron has prepared a Mechanical Ventilation Statement (refer to Appendix O), which confirms that the mechanical plant allowances anticipated in the current design are adequate to service the development.</p> <p>Additionally, E-LAB have confirmed within their Addendum Acoustic Assessment (Appendix N) that the previous assumptions on mechanical ventilation used within the original Noise and Vibration Impact Assessment (dated 16 July 2025) are consistent with the mechanical plant equipment outlined within Neuron's memo and therefore, no further assessment or mitigation measures are required.</p>

Key Issues	Response
Social impact analysis	
<p>The EIS references a previous social impact analysis undertaken in relation to the State-assessed rezoning proposal. Provide a social impact assessment to address the increased resident population and infrastructure demand that results from conversion of the approved commercial envelope to BTR. The SIA should also provide justification for the proposed dwelling mix.</p>	<p>A Social Impact Assessment (SIA) (dated 16 July 2025) was prepared by HillPDA as part of the State Assessed Rezoning Proposal and is submitted at Appendix K of this Submissions and Amendment Report.</p> <p>The SIA provides an assessment of the increased resident population and infrastructure demand resulting from the proposed change of use. Essentially, it confirms that despite the increase in population on site, demand for social infrastructure can be accommodated by the existing (and under development) infrastructure near the site. Of the assessed types of social infrastructure, the area surrounding the site was considered to be lacking in only one category, being natural open space areas within 400-800m of the site. Notwithstanding, this is inevitable within a highly dense and CBD environment and is considered to be of low risk, particularly with the consideration of the provision of communal open space and major recreation areas slightly beyond 800m from the site. Any additional infrastructure required to accommodate the increased population will be met and achieved through the payment of State and local contributions.</p> <p>Furthermore, it is acknowledged that the proposed apartment mix comprises a larger proportion of studios and one-bedroom apartments, which is a direct reflection of the proposed BtR model and its alignment with the rental market in Parramatta as detailed in Section 7.2 of the SIA. The appropriateness of an alternative apartment mix for BtR housing is directly recognised under the Housing SEPP, which provides flexibility in applying the ADG design criteria of Park 4K, relating to apartment mix. In this context, the proposed mix represents an appropriate and considered response to the BtR typology, delivering housing that aligns with demonstrated market demand while maintaining apartment diversity across the development. Further discussion on the apartment mix is provided in Section 4.3 of the Submissions and Amendment Report.</p>
Construction pedestrian and traffic management	
<p>The Department considers the ‘Overview Construction Pedestrian and Traffic Management’ provided at Chapter 8 of the Transport Impact Assessment (Appendix U of the EIS) to lack sufficient detail given the complexity of the site’s location and the intensity of vehicular and pedestrian movement in the vicinity, noting the proximity to the Paramatta bus and rail interchange. The Department requests a detailed Construction Pedestrian and Traffic Management Plan is provided.</p>	<p>In the time since the Early Works DA for the project (DA/392/2024) was approved by the City of Parramatta Council, an updated Construction Pedestrian and Traffic Management Plan (CPTMP) has been progressed, and prepared following consultation with Parramatta Council and TfNSW. The methodology and management plan arrangements will develop further to include the scope of works within this SSDA. The CPTMP will be updated prior to the issuance of the first Construction Certificate.</p>

Key Issues	Response
Internal acoustic environment and natural ventilation	
<p>The EIS states <i>'If the project internal noise limits for windows/doors open is exceeded, alternative means of ventilation is required in accordance with the requirements of the NCC (i.e. alternative ventilation system complying with AS 1668.2 and AS/NZS 3666.1) to the noise-affected spaces.'</i> The Department has reviewed the submitted documentation and notes that internal noise is exceeded, and therefore the Applicant is required to incorporate alternative means of natural ventilation.</p>	<p>As confirmed in Mechanical Ventilation Statement prepared by E-LAB (refer to Appendix O), alternative means of natural ventilation has been incorporated into the design of the development. Outside air louvres are provided for each unit, which are connected to a fan, allowing operation when the occupant wants the window closed. This will allow users to operate the fans when they want fresh air from the outside, whilst keeping their windows closed.</p>
Additional excavation	
<p>The EIS identifies that additional excavation is required to that approved by Parramatta Council (DA/392/2024) to facilitate lift pits. The Department requests that a bulk excavation plan is submitted (with supporting documentation) to identify the approved and proposed additional excavation works.</p>	<p>As discussed in Section 3.1 of the Submissions and Amendment Report, the proposal has been revised to reduce the extent of the basement to FFL-4.00, which is within the excavation depth approved under the Early Works DA. As such, no additional excavation is proposed as part of this SSDA. This is achieved by reducing the floor-to-floor height of each level, deleting the mezzanine level, and relocating the loading dock to the ground floor at the south-eastern corner of the site. With this, additional excavation beyond what was approved under DA/392/2024 is no longer required.</p>
Parramatta Local Environmental Plan 2012 (PLEP 2012)	
<p>Provide further consideration and information in response to the following PLEP 2012 clauses:</p> <ul style="list-style-type: none"> a. Clause 7.23 End of journey facilities (as the development involves at least 600m² of commercial premises) b. Clause 7.25 High performing building design (as the development involves uses to which this clause applies). This should also be addressed in the ESD Report (Appendix CC to the EIS). 	<p>As requested, Section 3.2 of the Submissions and Amendment Report provides further consideration and assessment of Clause 7.23 and 7.25 of the Parramatta LEP 2023.</p>
Signage	
<p>The EIS states that <i>'Details of the exact content, materiality, and illumination etc. of signs within the signage zones is sought to be the subject of approval by the Secretary prior to the issue of the relevant construction certificate. An appropriate condition of consent is sought to this effect.'</i> As development consent is required for the signage, the Department requires that the Applicant either provides sufficient detail for development consent to be sought for the signage as part of the SSD application or note that this will be the subject of a future separate development application to the relevant consent authority.</p>	<p>A total of six podium and top of building signs are proposed under this SSDA. Further details on the specifications and content of each sign are provided within the Updated Architectural Drawings at Appendix E as well as Section 4.16 of the Submissions and Amendment Report.</p>

Key Issues	Response
<p>Additional comments from the Department</p>	
<p><i>The project team sought informal feedback from the Department via email on 12 November 2025, regarding the design refinement relating to the loading dock. The following feedback was provided:</i></p>	
<p>Relocation of the loading dock from Basement 1 to the Fitzwilliam Street ground level appears to address issues raised by TfNSW and Council. This is supported in principle, subject to providing the following clarifications:</p> <ul style="list-style-type: none"> • Identify how the loading and resident vehicles and pedestrian thoroughfare will be managed in a manner that protects pedestrian safety. • The originally proposed loading dock has two dedicated loading bays, however it is unclear if the same is accommodated in the new location. The freight profile provided in the Traffic Impact Assessment should be addressed and accommodated in the revised scheme. • It is not clear how waste etc is transported from the holding areas at Basement 1 to the revised loading dock location. Please provide a detailed revised Waste Management Plan to explain the collection process. • As part of the detailed response to each concept consent condition, please identify whether condition 44 (waste) is satisfied or requires amendment as a result of the revised scheme. If requiring amendment, provide suggested wording and rationale. • Please provide a detailed resolution of entry and exit to the site, inclusive of modifications that may be required to blisters / light poles / traffic signal lanterns as a result of any crossover widening, supported by swept paths, for each movement scenario. • The revision (removal of undercroft) presents further change to the approved concept envelope. Please ensure that the revised concept envelope plans submitted to support the concept modification match the changes made in the detailed SSDA. 	<p>This additional feedback from the Department has been considered and addressed accordingly within Section 4.0 of the Submissions and Amendments Report. A summary of the responses is provided below:</p> <ul style="list-style-type: none"> • The management of loading services, resident vehicles and the pedestrian thoroughfare will be managed via a Loading Dock Management Plan, prepared before the occupation of the development. • A dedicated loading bay is provided on the lower ground floor of the site, with 2 x Small Rigid Vehicle (SRV) spaces, and 6 x service vehicle spaces provided in Basement Level 1. • As per the Addendum Waste Management Statement provided at Appendix Q, an interim bin storage area will be located on the lower ground floor to accommodate the storage of bins prior to collection, within close proximity to the collection vehicle. The WMP will be updated as a condition of consent, requiring details on transport of the bins from the holding area to lower ground level and the collection process. • Condition 44 of the Stage 1 Concept SSDA requires future DA's for basement levels or above ground works to demonstrate a swept path analysis that allows for Heavy Rigid Vehicles (HRV) to move in a forward direction. Upon further discussion with Council, it is confirmed that Council's longest waste truck is 10.734m, which is what is being accounted for within revised loading dock. As such, Condition 44 will be amended to reflect the revised loading dock, as further detailed within the Revised Stage 1 SSDA Conditions Table at Appendix D. • Updated Swept Path Diagrams have been prepared by Stantec and provided at Appendix P, confirming that access into the development by heavy vehicle is restricted to a right turn (in and out) only from Valentine Avenue. To allow this, the kerb island on the southern side of Valentine Avenue will need to be modified by the completion of the development. <p>Despite the removal of the undercroft, which presents a modification to the Concept Building Envelope, no changes are required to the approved drawings at this stage. As detailed within Section 3.2.2 of the Submissions and Amendment Report, Section 4.24(4) of the <i>Environmental Planning and Assessment Act 1979</i> (EP&A Act) allows a development application to be inconsistent with a concept consent, subject to a condition being imposed requiring the modification or surrendering to the Concept consent. As such, this SSDA requests a condition to modify the concept consent under Section 4.17(b) of the EP&A Act.</p>

Agency Advice

Table 2 Agency Advice

Key Issues	Actions
City of Parramatta Council	
<p>Economic Impacts</p> <ul style="list-style-type: none"> - The inclusion of over 20:1 FSR of build to rent and affordable housing within the commercial core of the Parramatta CBD is at the expense of realising its regional economic role and therefore in line with Council's resolution, Council objects to the current proposal on strategic grounds. - Council requests that an Economic Impact Assessment be prepared (as outlined by the applicant in its Deliverables List to support the Planning Proposal in 2024) to assess and justify the job losses that will result on site. - Parramatta City centre has seen several hotel accommodation approvals. Council recommends that a Visitor Accommodation Analysis is provided which demonstrates the feasibility of the proposed hotel use in the Parramatta CBD. - Council further requests that an adaptable design of the tower building be tested to enable its conversion to commercial uses should it be viable to do so in the future. 	<p>An Economic Impact Assessment (EIA) was prepared as part of the concurrent State Assessed Rezoning Proposal, and has been attached alongside the Addendum Economic Impact Statement prepared by Colliers and provided at Appendix I and Appendix J respectively.</p> <p>The EIA provides a thorough assessment of the impact on the economy and employment from the change of use from commercial office to retail and confirms the following:</p> <ul style="list-style-type: none"> • Estimated employment for the proposal is 160 direct FTE jobs and 88 indirect FTE jobs, equating to a total of 248 FTE jobs. While this is less than the Stage 1 Concept, it is emphasised that it is a net gain in employment and economic activity from the current and underutilised nature of the site. • Future on site resident population estimated to support \$26.2 million in retail expenditure each year, while the future hotel patrons will support a further \$26.8 million in visitor expenditure each year. Therefore, the proposal will contribute significantly to the local economy through the provision of retail and hotel uses. <p>Furthermore, Section 2.3 of the EIA includes a review of visitor demand and supply, trends and type of visitor, showing market growth and opportunity for additional visitor accommodation uses in Parramatta to serve a range of customer segments including the corporate sector. The findings were that the market gap for commercial visitor accommodation rooms in the CBD was estimated at 1,569 rooms over the period to 2041. Therefore, the proposal will help to address some of this significantly undersupply.</p> <p>SJB have also explored the potential conversion of the eastern tower within their Addendum Architectural Design Report at Appendix F, which clearly shows that the tower can be readily converted to a hotel in the future.</p> <p>Further assessment on the economic impact is provided within Section 4.11 of the Submissions and Amendment Report.</p>

Key Issues	Actions
<p>Social Impacts</p> <ul style="list-style-type: none"> - Council objects to the social impacts of the proposal due to the pressure of unanticipated residential growth on local infrastructure, the poor dwelling mix and under-sized studio apartments. Furthermore, clarification is required on the proposed planning controls for the site and affordable housing as an additional permitted use. - Council seeks to enter into a planning agreement for works in kind to be delivered on site and/or monetary contribution (in addition to any local contributions payable) to meet this unanticipated infrastructure demand. - Council asks the applicant to prepare a Social Impact and Infrastructure Needs Assessment in consultation with Council. - Council Officers object to the current dwelling mix provided and recommends that the social impact assessment be revised to ensure an increase in 2 and 3 bedrooms are provided. 	<p>As detailed within Section 4.12 of the Submissions and Amendment Report, a Social Impact Assessment was prepared by HillPDA for the State Assessed Rezoning Report, which is attached alongside the Addendum Social Impact Statement at Appendix K and Appendix L respectively.</p> <p>An infrastructure needs assessment was undertaken within the original SIA, which confirmed that the demand for social infrastructure generated by the increase in resident population can be accommodated by the existing infrastructure near the site. Of the assessed types of social infrastructure, only one type of infrastructure was lacking, which was natural open space within 400-800m of the site. Despite this, it is considered that a shortage of natural open space is inevitable within a highly dense and CBD environment. Furthermore, the proposal allocates 30% of the site area as communal open space, which will assist in alleviating the demand. Any additional infrastructure required to accommodate the increased population will be met and achieved through the payment of State and local contributions, any no additional monetary contribution is required for this development. Following extensive engagement with Council, this has been supported and no planning agreement is required.</p> <p>The apartment mix, while presenting a variation to the Parramatta DCP 2023 controls, is reflective of the proposed BtR model and its alignment with the rental market in Parramatta as detailed in Section 7.2 of the SIA. Further discussion on the apartment mix is provided in Section 4.3 of the Submissions and Amendment Report, which clearly demonstrates its appropriateness for the development.</p>
<p>Design Matters</p> <ul style="list-style-type: none"> - Council Officers request that the Department not grant a design competition waiver until such time that the Design Jury is reconvened to assess the proposal to confirm that the scheme can achieve design excellence as per PLEP 2023. The change of proposal from a build to rent and commercial scheme to a majority build to rent scheme has resultant consequences on the design. - Council Officers object to the current design and request that the pedestrian link be redesigned to reflect the original competition design. - Council Officers request that the size, location and number of structural columns be revised. It is noted that the need to reduce the size of columns in Argyle Street was raised by the Design Jury and is supported however the seven additional columns located on the eastern 	<p>As detailed within the original Environmental Impact Statement, a competitive design excellence process was undertaken for a commercial office and residential building in July 2024, which found SJB to be the winner. Despite the proposed change of use of the eastern tower and podium, the proposal retains the defining design principles, key features and intended outcomes of the competitive winning scheme, continues to meet the project objectives, and preserves the design attributes and building envelope of the winning scheme. It is important to note that the change of use has been thoroughly reviewed by the design integrity panel on two occasions to ensure that the eastern tower is suitable for residential development and can achieve a high level of residential amenity.</p>

Key Issues	Actions
<p>end of Argyle Street adjacent to the façade of the podium confuse the space of the colonnade, impede the reading of the link access and clutter the elevation.</p> <ul style="list-style-type: none"> - Council Officers recommend that design measures are incorporated on each level that exceeds 8 units. - Council does not support the chamfered setback between the podium and tower, as it was initially introduced to enable a larger floorplate in the tower for commercial uses. 	<p>Given the design competition, as well as the extensive design excellence review undertaken for the development, the proposal satisfies Clause 7.14(3) of the Parramatta LEP 2023, which states <i>“development consent must not be granted to development to which this clause applies unless a competitive design process has been held in relation to the development”</i>. Therefore, on this basis, there is no need for a design competition waiver, as a design competition has already been undertaken in relation to the proposed development.</p> <p>In response to Council’s other comments on design matters, a series of refinements have been refined to further improve the proposal, which are detailed within the Addendum Architectural Design Report prepared by SJB at Appendix F and summarised below:</p> <ul style="list-style-type: none"> • The pedestrian through site link has been amended to remove three structural columns to improve sightlines to the through the link, and realign the civic staircase to deliver a more direct connection between the two stairs. The proposal maintains the 9m angled aperture supported during the design competition, while expanding it to a total width of 16m. • From a structural perspective, the columns are essential to support the towers, whilst architecturally, the columns ground the towers and emphasise the verticality. As such, they cannot be reduced in size or number, but instead the proposal includes a slight repositioning of the eastern row of columns so that they sit within the building line, reducing their projection into the column. This amendment removes the tunnel effect, opens the colonnade to light and views, and maintains clear visibility of buses and passengers, while retaining shade beneath the canopy. • Despite the minor variation to the ADG’s design criteria requiring eight apartments per floor, the tower floor plates have been carefully designed to ensure that the increased numbers do not compromise residential amenity or the functionality of the common areas. The proposed floor plate also maintains a high-quality common circulation environment, with 1.6m wide corridors and clear sightlines to windows at both ends, improving daylight penetration, safety and wayfinding. • The proposal has been amended to remove the chamfered setback and replace it with a 4m double height space to clearly distinguish the podium from the tower. This double height expression creates a shadow gap between the podium and tower to establish a defined street wall height with canopy planting, which is aligned with the intent of the Parramatta DCP 2023.

Key Issues	Actions
<p>Traffic</p> <ul style="list-style-type: none"> - it is strongly recommended that the applicant be asked to provide a detailed CPTMP prior to any SSDA approval to ensure that a plausible construction methodology is implemented and any additional requirements, such as for the modification of traffic signals or other traffic arrangements, are agreed to as part of any consent. - Council Officers recommend that the proposal be amended to include individual residential storage units that can store a bicycle which could then count as residential bicycle spaces. - Council recommends that the loading spaces (including their layout) should be revised. - Accordingly, the car park layout is to be amended to address the non-compliances with the standards. - Further testing of swept paths is required for heavy rigid vehicles. - Further information is required regarding any control points into the basement car park to ensure they comply with the relevant clauses of AS 2890.1. - Council recommends that sight line splays for pedestrian safety are provided and not obstructed in accordance with section 3.2.3(b) of AS 2890.1 	<p>Further detail on the above amendments and responses are provided within Section 3.1 and Section 4.0 of the Submissions and Amendment Report.</p> <p>Stantec have prepared a detailed response to Council’s comments within the Addendum Letter provided at Appendix P. In summary, the following responses are provided:</p> <ul style="list-style-type: none"> • An Updated Construction Pedestrian Traffic Management Plan has been progressed and prepared following consultation with Council and TfNSW, which will be resubmitted prior to the first construction certificate. • Given the sites location within a transport hub and its immediate proximity to the train station and key amenities, the provision of 441 bicycle spaces is sufficient to provide for the needs of the development and therefore, no changes are proposed to provide additional bicycle spaces. • The loading dock is relocated to the lower ground level. • Any non-compliances with the car parking standards will be addressed during the detailed design development of the project and confirmation will be provided prior to the first construction certificate. • Updated swept paths have been prepared, which confirms that the proposal can accommodate a 10.8m vehicle, which is Council’s largest waste vehicle. <p>Section 3.1 and Section 4.9 of the Submissions and Amendment Report provides further detail on the proposed amendments to the basement and loading dock, as well as justification for the bicycle parking, car parking layout and non-compliances with the Australian Standards.</p>
<p>Universal Access</p> <ul style="list-style-type: none"> - Council recommends that the accessible pathways and adaptable units should be addressed in a revised application. - Council recommends that an additional 45 adaptable units be provided to ensure compliance with Part 4Q of the Apartment Design Guide. - Council encourages the additional provision of accessible rooms within the hotel, in accordance with the requirements of Part D4 of the National Construction Code. 	<p>The proposal provides a total of 61 adaptable apartments, which exceed the standard liveable housing guidelines by adopting the SDA NDIS standards. While this falls short of the recommended amount under the ADG and the DCP, it is considered that for the large scale of the development and its use as BtR, the provision of 61 adaptable apartments is more than suitable. Further justification on the quantum of adaptable apartments is provided within Section 4.8 of the Submissions and Amendment Report.</p> <p>In relation to accessible rooms within the hotel, accessibility measures will be incorporated into the design of the hotel rooms at the detailed design stage of the development.</p>

Key Issues	Actions
<p>Waste Management</p> <ul style="list-style-type: none"> - The Waste Management Plan indicates that the residential waste service will utilise a 120L capacity per unit, and the operation will be managed by the Council's waste contractor. Council's waste services are available in either 80L or 140L capacities. Each floor is equipped with space for 240L recycling bins located next to the waste chutes. In addition, 80L FOGO bins should be included in this area. By giving residents convenient access to dispose of their food and organic waste, we can encourage greater participation in this new waste stream. - Council does not support the use of turntables for gaining access to waste collection points. Where on-site access is required for bin collection, adequate and safe access must be provided for Council's Standard Waste Collection Vehicles from a loading dock. The site must be designed to allow for HRV to enter and exit in a forward direction and to adequately manoeuvre onsite without the use of a turntable. Council Officers request that the applicant redesign the loading dock without a turntable or demonstrate how it cannot be accommodated turntable-free. 	<p>As detailed within the Addendum Waste Management Statement prepared by Elephants Foot at Appendix Q, waste generation rates have been updated to correctly reflect the Council's bin quantity estimations. Collection frequencies remain unchanged, however, bin quantities have been adjusted in accordance with Council's waste generation requirements. Based on the updated calculation, a total of 18 general waste bins, 21 recycling bins, and 46 FOGO bins will be required for the development.</p> <p>The revised scheme comprises an interim bin storage area on the lower ground level, which will accommodate the storage bins prior to collection, within close proximity to the collection vehicle. This would provide direct access for contractors to access bins and bulky wastes for collection cycles. The remaining bin storage rooms have been designed accordingly to the waste management requirements for both residential and commercial/retail components for disposal, bin rotations and resource collections (i.e. bins and bulky waste materials with these revised calculations).</p> <p>Furthermore, as illustrated on the updated swept path diagrams (included as part of Appendix P), the loading dock has been revised to remove the turntables, while still allowing heavy vehicles to enter and exit in a forward direction.</p>
<p>Water Management</p> <ul style="list-style-type: none"> - Council requires wherever possible that WSUD be integrated into the landscape and not totally reliant on end of pipe proprietary treatment devices. This proposed design has not met this criterion. - Council requires adherence to the following targets to achieve the objectives and provisions of the State Environmental Planning Policy (Biodiversity and Conservation) 2021 and Parramatta Local Environmental Plan 2023. <ul style="list-style-type: none"> a. Gross Pollutants 90% Reduction in the post development mean annual load of total gross pollutants load (greater than 5mm). b. Total Suspended Solids 85% reduction in the post development mean annual load of Total Suspended Solids (TSS). c. Total Phosphorus 65% reduction in the post development mean annual load of Total Phosphorus (TP). 	<p>The project does not have any lower ground level landscaping to provide passive water quality abilities to make the provision of WSUD work hydraulically. The proposed development complies with the water quality targets, achieving the objectives and provisions of the <i>State Environmental Planning Policy (Biodiversity and Conservation) 2021</i> and <i>Parramatta Local Environmental Plan 2023</i>. BG+E has provided a 200KL rainwater tank to meet these requirements as outlined in the Addendum Stormwater Management Letter (included as Appendix W).</p>

Key Issues	Actions
<p>d. Total Nitrogen 45% reduction in the post development mean annual load of Total Nitrogen (TN). Hydrocarbons, motor oils, oil and grease 90% reduction in the post development mean annual load of hydrocarbons, oils, and grease.</p> <ul style="list-style-type: none"> - Note: Reductions in pollutant loads are relative to the pollution generation from the same development without treatment. This proposed design has not met this criterion. 	
<p>Landscape Matters</p> <ul style="list-style-type: none"> - Council Officers requests that minor comments be considered in revised landscape drawings, as it relates to the private domain. 	<p>Land and Form have provided an Updated Landscape Plans and an Updated Landscape Design Report at Appendix G and Appendix H.</p>
<p>Additional comments from City of Parramatta Council</p>	
<p><i>Following a meeting with City of Parramatta Council on 22 October 2025, additional feedback was provided to the project team via email on 10 November 2025. This feedback included:</i></p>	
<p>Traffic:</p> <ul style="list-style-type: none"> • Council's previous comment regarding retail parking has been satisfactorily addressed by the applicant. • The provision of bicycle parking is well short of the Parramatta DCP requirements, and greater regard should be given to the DCP rates in line with Condition C.40 of the Concept DA. • Council is still concerned with the loading bays as provided, and the Stantec response fails to elaborate on how tandem loading bays for B99 vehicles would be managed through a Loading Dock Management Plan. • There are no objections to deferring non-compliances with AS 2890.1 on the basis that Council would not have an issue with the applicant providing reduced parking spaces if they cannot comply with the minimum requirements of the Australian Standards. • While there are no traffic objections with using an 8.8m MRV for waste collection (subject to swept paths), Council's Waste team will need to confirm if this size vehicle will be acceptable. Otherwise, the previous issues raised still stand. • Stantec's response proposes to defer further consideration of the traffic control point matter to a later stage in the design development, which Council has no concerns with. • Stantec's response regarding sight lines is considered acceptable. A condition should be included in any approval to safeguard this. • For the traffic generation modelling to have any value, it should aim to represent what is occurring in the real world as far as practical. As downstream intersections are clearly impacting the capacity of the modelled intersections, their impacts need to be appropriately modelled. 	<p>This feedback has been incorporated into Section 4.0 of the Submissions and Amendment Report and has been addressed in the Addendum Transport Letter prepared by Stantec at Appendix P. A summary of the responses is provided below:</p> <ul style="list-style-type: none"> • Bicycle parking has increased by 158, to a total of 441 spaces. While this is still short of the required DCP amount of 811, it is more than sufficient and adequate for the proposal, particularly given its location within the Parramatta CBD and its proximity to the station. • The basement car park has been redesigned to remove tandem service parking spaces. • Council's waste team have confirmed the maximum waste vehicle is 10.74m. The loading dock has been designed accordingly to accommodate a 10.8m vehicle. • The traffic generation modelling has been updated to not allow right turns out of Valentine Avenue into Parkes Street. This volume has been redistributed to access Parkes Street via Wentworth Street, noting that the volumes are minimal at 6 and 9 vehicles per hour in the AM and PM peak, respectively. The updated model also assumes that in the two way Valentine Avenue scenario, the right turn into Parkes Street will be banned due to multiple lanes that need to be crossed to turn right. <p>Refer to Section 4.9 of the Submissions and Amendment Report for further detail.</p>

Key Issues	Actions
<p>Waste:</p> <ul style="list-style-type: none"> • The development is required to demonstrate: <ul style="list-style-type: none"> - A maximum clearance for access for a Heavy Rigid Vehicle (HRV) waste collection truck to service the complex. - To ensure continuity of service and mitigate potential disruptions, Council requires that HRVs be able to access and turn within the loading dock area without reliance on a turntable. 	<p>As detailed above, the proposed development has undergone design refinements, including relocating the loading dock, to accommodate a 10.734m long vehicle which is capable of servicing the proposed development. Stantec have prepared swept paths to demonstrate access to the site without a turntable (refer to Appendix P).</p>
<p>Design</p> <ul style="list-style-type: none"> • The proposed removal of the chamfered levels, and the replanning of these levels is supported. This change results in: <ul style="list-style-type: none"> - A 'belted recessed' level that distinguishes the tower from the base of the building. - An increase in floor space. - A change to the apartment numbers and types. • These changes need to be addressed in the SSDA submission. • The enclosed vehicle entry at the south /eastern corner of the site is supported. This change results in: <ul style="list-style-type: none"> - A continuous street wall along Fitzwilliam Street in accordance with PDCP Part 9. - A stronger corner where the podium meets the ground plane. - A vehicle entry that is more clearly differentiated from pedestrian movement. • In relation to the existing ramp at the eastern ends of the site (between Valentine Ave to Argyle St), Council Officers are supportive of pedestrian access being maintained in a ramp confirmation. The key reason is that it provides a less steep and convoluted accessible route to Argyle Street, in a highly trafficable area. However, the following will be required to be confirmed: <ul style="list-style-type: none"> - Removal of the steps shown to revert to ramping; - Creation of shared pedestrian/ vehicle zone; - Confirmation that TfNSW would be supportive of this shared zone; and - That it could be secured via a 24/7 easement. 	<p>The project team notes Council's support of the removal of the chamfer and the enclosure of the vehicular entry and has incorporated these amendments into the revised design of the development as detailed within the Updated Architectural Drawings and the Addendum Architectural Design Report at Appendix E and Appendix F.</p> <p>The ramped connection between Valentine Avenue and Argyle Street has been incorporated into the design of the development, creating a shared pedestrian and vehicle zone in accordance with Council's feedback.</p>

Key Issues	Actions
TfNSW	
<p>Access to the Development</p> <ul style="list-style-type: none"> - TfNSW recommends that access to the site be limited to right hand turns from Valentine Avenue to prevent impact upon the operation and safety of the Fitzwilliam, Valentine and Wentworth TCS and requests that this is addressed by the Applicant as part of the RtS. 	<p>As discussed in the Addendum Transport Letter prepared by Stantec (refer to Appendix P), access into the development by heavy vehicles is proposed to be restricted to right turns (in and out) only from Valentine Avenue. This is further discussed in Section 4.9 of the Response to Submissions Report.</p>
<p>Trip distribution and traffic modelling</p> <ul style="list-style-type: none"> - TfNSW has reviewed the proposal and notes that the trip distributions contained in the traffic impact assessment have not considered any right turns out of Valentine Ave onto Parkes Street while the models still allow these movements. This should be addressed by the Applicant as part of the RtS. - TfNSW recommends that the amended Transport Impact Assessment (TIA) prepared for the proposed development be updated to be addressed the above comment as part of the RtS. 	<p>An Addendum Transport Letter has been prepared (refer to Appendix P) which has updated the traffic modelling to not allow right turns out of Valentine Avenue into Parkes Street. This volume has been redistributed to access Parkes Street via Wentworth Street, noting that the volumes are minimal at 6 and 9 vehicles per hour in the AM and PM peak, respectively. It has been assumed that in the two way Valentine Avenue scenario, the right turn into Parkes Street will be banned due to multiple lanes that needed to be crossed to turn right.</p>
<p>Proposed TCS (Valentine Avenue and Parkes Street)</p> <ul style="list-style-type: none"> - The traffic impact assessment refers to investigations into the installation of traffic signals at Valentine Avenue and Parkes Street. TfNSW does not support a TCS at this location due to proximity with existing Station Street intersection and this should be documented in an amended TIA as part of the RtS. - TfNSW recommends that the amended TIA prepared for the proposed development be updated to be addressed the above comment as part of the RtS. 	<p>As detailed within the original TIA, the proposal to signalise the intersection of Valentine Avenue and Parkes Street was requested by Council and not necessarily a requirement from the development proposal. Therefore, Stantec in their Addendum Transport Letter provided at Appendix P, confirm that they have no objections in not providing the traffic signals at this location.</p>
<p>Delivery and Servicing</p> <ul style="list-style-type: none"> - All new developments should be self-sufficient and cater for all loading and servicing on-site. The applicant should not rely on the kerbside restrictions being available for site operations. - TfNSW advises that the development should provide adequate loading and servicing vehicle spaces on-site to efficiently operate the loading dock. The current proposal fails to meet the anticipated freight servicing profile. TfNSW recommends increasing the provision to meet the demand for loading bays (including medium spaces) as identified, to reduce the likelihood of vehicles circulating and creating congestion. - It is recommended that dedicated service vehicle spaces be designed to accommodate safe and efficient loading and unloading of goods. Tandem parking arrangements are generally unsuitable for service vehicles, - Note: Reductions in pollutant loads are relative to the pollution generation from the same development without treatment. This proposed design has not met this criterion. 	<p>The Updated Transport Impact Assessment addresses the revised loading dock location within the development, and the revised capacity of the loading dock. The revised loading dock accommodates one (1) space at the ground level, which is able to accommodate a 10.8m waste vehicle, with two (2) small rigid vehicles and six (6) B99 service vehicle spaces accommodated in the basement level 01.</p> <p>The TfNSW Urban Freight Forecasting Model (UFFM) was used to estimate the daily profiles of the volume and types of freight and servicing activity that the building is likely to generate across a typical weekday. Based on the development yield and the proposed provision, the UFFM found that the loading dock will have an average efficacy of 84.74%. The following provides a summary of the UFFM results:</p> <ul style="list-style-type: none"> • The likelihood of large vehicles (including MRV's and waste vehicles up to 10.8m) being rejected and sent back to the road network is highly unlikely.

Key Issues	Actions
<ul style="list-style-type: none"> - Council requires reduction in the net discharge from the site by 10% compared to the site in an undeveloped (natural state). (Note this is total discharge over the long term and does not refer to OSD.) This is likely to require more substantial rainwater harvesting and use on site. This proposed design has not met this criterion. - Council requires design and operation of an integrated water management plan. This would incorporate rainwater capture and use of rainwater in the landscape for irrigation, discharge quantity reduction and improved discharge water quality. This proposed design has not met this criterion. It is noted that the project is committed to dual piping. This should be explored further. 	<ul style="list-style-type: none"> • The number of medium vehicles (SRV and Small trucks) likely to be rejected during the daily arrival profile (9am and 12pm) is less than 0.02 vehicles per hour. This represents a very unlikely scenario and evidently, the efficacy of the medium vehicle spaces remains close to 100% during the peak hours. • During the daily arrival profile, there is a likely scenario that approximately 1 small vehicle (B99s, Utes, Vans) will be rejected from entering the loading dock since all the small spaces may be occupied. It should be noted however, that this can only be expected to occur during the peak of the day, and not throughout the typical day. This can be clearly managed by the loading dock manager or building manager in terms of scheduling of arrivals to avoid overlapping deliveries or servicing. <p>As such, with management in place, the loading dock provision is considered self-sufficient to service the requirements of the development proposal without having to rely on kerb-side loading zones for deliveries or servicing.</p> <p>Stormwater and pollution generation has been assessed by BG&E in their Addendum Stormwater Management Letter at Appendix W, which essentially confirms that the proposal complies with the relevant water quality targets established under the Parramatta DCP 2023. Furthermore, a 200kL rainwater tank is proposed to meet the requirements to reduce the net discharge from the site by 10%.</p>
<p>Protection of future New Cumberland Line (NCL) Corridor</p> <ul style="list-style-type: none"> - There are concerns about the potential effect on the structural integrity and safe operation of the future NCL with the proposed development in place. The future NCL corridor should be protected and TfNSW needs to ensure that the proposed works will not have an adverse impact on the future viability of the NCL corridor. - It is requested the Applicant provides the following information for TfNSW review and endorsement prior to lodging the RtS stage: <ul style="list-style-type: none"> • Geotechnical Report - Geotechnical Report shall be provided with an engineering assessment of the ground/structure interaction, associated with the NCL. A detailed geotechnical analysis needs to be undertaken to the satisfaction of TfNSW to determine likely ground movements associated with the construction of the future NCL, will not adversely impact upon the development. • Structural Assessment - Structural Report shall be provided with structural foundation design and associated drawings, together with ground conditions determined as part of 	<p>As detailed within Section 4.10 of the Submissions and Amendment Report and in the MacroPlan cover letter provided at Appendix T, the project commenced well before the release of the information related to the NCL corridor. There have been extensive and ongoing discussions with TfNSW since the acquisition of the site in 2023, and with consideration of the approved Stage 1 SSDA and the Early Works DA, the proposal should be taken as built and complete.</p> <p>This is supported by the savings provision introduced in the amended Transport and Infrastructure SEPP, which exempts the subject development application from having to consider the NCL corridor as it was lodged prior to gazettal on 12 December 2025. Despite this, the following additional documentation has been prepared to respond to TfNSW's concerns:</p> <ul style="list-style-type: none"> • Addendum Acoustic Assessment, prepared by E-LAB (Appendix N). • Geotechnical Statement, prepared by Douglas Partners (Appendix R).

Key Issues	Actions
<p>the geotechnical assessment to confirm that appropriate consideration of the future NCL to enable verification of compliance to TfNSW requirements. Drawings should show offsets to the NCL including protection zones in both plan and elevation sections.</p> <ul style="list-style-type: none"> • Noise and Vibration - Confirmation is required that the submitted Acoustic Assessment Report has been prepared in accordance with the TfNSW Corridor Protection requirements such as all structures must be designed, constructed and maintained so as to avoid any damage or other interference which may occur as a result of noise and vibration from railway operations, on the assumption that source vibration level from trains as a result of attenuation provided by the track structure; and • Electrolysis Report - All structures must be designed, constructed and maintained to avoid any damage or other interference, which may occur because of stray electrical currents, electromagnetic effects and the like from future railway operations. The applicant must incorporate in the development all the measures recommended in the report to control the risk. 	<ul style="list-style-type: none"> • Addendum Structural Statement, prepared by BG+E (Appendix S). <p>Refer to Section 4.10 of the Submissions and Amendment Report for further detail on the findings of the assessment.</p>
Heritage NSW	
<p>Heritage</p> <ul style="list-style-type: none"> - a SoHI is required by consent condition C26 for the concept design (SSD-49808717) as well as the recommendations and mitigation measures from the Artefact Heritage Report. - We recommend that the SoHI include consideration of heritage impacts on Lancer Barracks (Parramatta Local Environmental Plan 2023 item I645 and Commonwealth Heritage List Place ID 105214) which is in close proximity to the SSD site. - advise on how the following recommendations and mitigation measures from the Artefact Heritage report have been addressed in the EIS: <ul style="list-style-type: none"> - A suitably qualified heritage consultant should be engaged to provide heritage advice throughout design development. - Consideration should be given to the provision of heritage interpretation as part of the project, which would outline the history and associations of the site and the wider Parramatta area. Interpretive measures could involve interpretive signage, panels or displays at entry/exit points to the building. - DPHI require the applicant to advise how the application complies with consent condition C27(e) of SSD-49808717, which requires the application to ‘demonstrate how the results of archaeological investigations contribute to a heritage interpretation plan for the site’. 	<p>GML has prepared a Heritage Statement (Appendix V), which confirms the following:</p> <ul style="list-style-type: none"> • the proposed development is not anticipated to have any adverse impacts on the Lancer Barracks heritage item. • The recommendations and mitigation measures provided by Artefact in the Aboriginal Cultural Heritage Assessment Report (ACHAR) have been noted and incorporated into the construction and detailed design development approach moving forward. • Test excavation will be undertaken, prior to ground disturbing works beginning in the area of Potential Archaeological Deposit (PAD), and if required, further works will be undertaken to confirm the impact of the proposed development on potential Aboriginal heritage.

Key Issues	Actions
<p>Aboriginal Cultural Heritage</p> <ul style="list-style-type: none"> - Heritage NSW notes that if Aboriginal objects are identified during text excavations, it will be necessary for the proponent to seek an additional AHIP to enable works to proceed. 	<p>Noted. No action.</p>
<p>NSW Department of Climate Change, Energy, the Environment and Water</p>	
<p>Water take and licensing</p> <ul style="list-style-type: none"> - Requests the proponent to quantify the maximum annual volume of water take due to aquifer interference activities for the operational phase of the development and demonstrate the ability to acquire sufficient water entitlement unless an exemption applies. 	<p>Extensive monitoring and testing of the groundwater was undertaken within the Hydrogeological Report provided at Appendix Z of the EIS. The results of the testing found that the proposal will intercept the local groundwater system and as a result, will require site dewatering to facilitate basement construction. Groundwater extracted during the dewatering process will be treated to meet water quality criteria for temporary discharge into the municipal stormwater system.</p> <p>The dewatering will be undertaken in accordance with the Dewatering Management Plan prepared by EI Australia and provided within Appendix Z of the EIS.</p>
<p>Post determination</p> <ul style="list-style-type: none"> - Requests the proponent to obtain a water access license (WAL) to account for the maximum predicted water take for construction and operation activities unless an exemption applies under the <i>Water Management (General) Regulation 2025</i>. 	<p>The monitoring found that the groundwater seepage flow draining through the shored walls into the excavation is predicted to be 8.61ML during the first year of construction. Accordingly, a WAL will be required and will be obtained post determination as noted.</p>
<p>Endeavour Energy</p>	
<p>Site Servicing</p> <ul style="list-style-type: none"> - Any required distribution substation will need to be located within the property (in a suitable and accessible location) and be protected (including any associated cabling not located within a public road / reserve) with an appropriate form of property tenure as detailed in the attached copy of Endeavour Energy’s ‘Land Interest Guidelines for Network Connection’. 	<p>Noted. No action required at this stage.</p>
<p>Sydney Water</p>	
<p>It is recommended that dual-pipe provisions are considered for this development in line with the Greater Parramatta to Sydney Olympic Park recycled water initiatives and the Parramatta DCP which states that all developments within the precinct must install a dual reticulation system to support the immediate or future connection to a recycled water network.</p>	<p>Dual reticulation to toilets is expected to be installed to allow for future connection to recycled water networks proposed in Parramatta.</p>

Public Submissions

Table 3 Public Submissions

Key Issues	Response
<p>Reduction of Sunlight</p> <ul style="list-style-type: none"> - casting extensive shadows across the east-facing apartments of 88 Church Street. - loss of this limited but vital natural light will significantly reduce the quality of living conditions for residents.²⁶ - Block sunlight and views for many West Village apartments 	<p>Section 4.1 of the Submissions and Amendments Report provides a detailed assessment and justification of potential overshadowing impacts to surrounding residents, including 88 Church Street. As confirmed in the amended solar access diagrams and overshadowing diagrams (refer to Appendix E), the proposed development does not cause any additional overshadowing to residents of 88 Church Street, that were not already assessed under and deemed acceptable in the Stage 1 Concept SSDA.</p>
<p>Increased Traffic Congestion</p> <ul style="list-style-type: none"> - heavy congestion already occurs on Parkes Street and Valentine Avenue during the evening peak, with long delays for right-turning traffic. - Introducing further density through this development will overload these routes, worsening bottlenecks and leading to extended delays and safety risks for both residents and the wider community - Intensify already heavy traffic and congestion in the area - Safety for pedestrians (due to increased vehicle movements) 	<p>Section 4.9 of the Submissions and Amendment Report discusses the impacts of the proposed development on surrounding road networks, and the overall traffic impacts of the development. Design refinements to the project has resulted in Stantec preparing an Addendum Transport Letter, considering the congestion on Parkes Street and Valetine Avenue and the cumulative impacts of the proposed development. As discussed in Appendix P, the proposed development is considered to be acceptable on the basis of traffic impacts.</p>
<p>Erosion of Privacy</p> <ul style="list-style-type: none"> - The positioning and scale of the proposed buildings will directly overlook existing apartments at 88 Church Street, severely undermining resident’s privacy and sense of security. 	<p>Privacy impacts for surrounding residential developments are assessed and discussed in Section 4.1 of the Submissions and Amendment Report. The proposed development has been designed in accordance with the objectives of the ADG, ensuring that privacy to existing residential buildings within the area are maintained. Due to the orientation of the site, the southern residential units that face 88 Church Street are angled, preventing direct overlooking to 88 Church Street residents. Additionally, the distance between the two developments further reduces the chance for overlooking, as there are a number of buildings located between the two buildings.</p>
<p>Elimination of Remaining Views</p> <ul style="list-style-type: none"> - This proposal would remove the last remaining corridor of open view, leaving no visible horizon. - Unlike the distant obstruction caused by 180 George Street, the close proximity of this building means its visual impact is immediate and absolute, effectively erasing the final aspect of the district skyline available to these apartments 	<p>The visual impacts of the proposed development for surrounding residents has been considered throughout all stages of the project, and has been assessed and deemed acceptable in the Stage 1 Concept SSDA. Through undertaking Visual Impact Assessments, the impacts of the proposed development for surrounding residents has been considered. The built form of the development is largely consistent with the Stage 1 Concept SSDA and therefore, impacts to views have already been approved and deemed as acceptable.</p>

Key Issues	Response
<p>Pressure on existing infrastructure</p> <ul style="list-style-type: none"> - The scale of this development will further stretch the amenities around the area, reducing the liveability of the precinct. 	<p>As part of the assessment of the proposed development, the cumulative impacts of the proposal has been considered. As assessed in Section 4.2 of the EIS, the proposed development has been designed in accordance with the Stage 1 Concept Approval (SSD-49808717), which was the subject of a thorough assessment of cumulative environmental impacts. Particular consideration was given during the assessment of the concept proposal on existing infrastructure within Parramatta CBD. As confirmed in the Social Impact Assessment (refer to Appendix K) and the Addendum Social Impact Assessment (refer to Appendix L), a Social Infrastructure Needs Assessment has been undertaken, which confirms that despite the increase in population on the site, demand for social infrastructure can be accommodated by the existing (and under development) infrastructure that surrounds the site.</p> <p>Of the assessed types of social infrastructure, the area surrounding the site was considered to be lacking in only one category, being natural open spaces within 400-800m of the site. Notwithstanding this lack of natural open space, this is inevitable within the highly dense and CBD environment of Parramatta and is considered to be of low risk, particularly with the consideration of the provision of communal open space and major recreation areas slightly beyond the 800m radius from the site. Ultimately, the scale of this development is considered to be appropriate for the location, and will not reduce the liveability of the precinct, as the supply of existing (and under development) infrastructure is sufficient to accommodate the increase in population.</p>
<p>Noise and amenity impacts</p> <ul style="list-style-type: none"> - construction activity will cause years of disruption, noise, and dust for current residents 	<p>As part of the SSDA Lodgement, Appendix C provides a detailed list of all the relevant mitigation measures that should be implemented into the construction and operation of the project, to reduce amenity impacts on surrounding residents and the environment. In particular, construction mitigation measures have been provided, which will be implemented to ensure that there are no adverse noise and amenity impacts caused by the proposed development.</p>
<p>More certainty about affordable housing provision</p> <ul style="list-style-type: none"> - Affordable housing should be held in perpetuity, not just for 15 years 	<p>With respect to tenure, the Housing SEPP mandates a 15-year minimum term, which is secured by conditions of consent. While submissions suggested a longer term or permanent retention, planning legislation applicable to the site does not currently mandate a requirement for affordable housing to be delivered in perpetuity. However, it is not uncommon for Community Housing Providers to retain such dwellings beyond the minimum term, subject to funding and operational viability.</p>

Key Issues	Response
<p>Bulk, scale and streetscape character</p> <ul style="list-style-type: none"> - towers present a bulk and scale that is inappropriate for the site - more retail integration and proper setbacks should be required 	<p>The bulk and scale of the proposed development has been designed to be largely consistent with the approved building envelope under the Stage 1 Concept SSDA. The setbacks of the development, as a result of converting the approved commercial tower to residential is discussed in Section 4.1 of the Submissions and Amendment Report. Retail tenancies have been integrated into the proposed development in all areas of the ground floor that are not used for residential or hotel lobbies.</p>
<p>Land Use</p> <ul style="list-style-type: none"> - the land is right beside the existing train station and bus exchange the land would be much better used to expand those facilities - Having a green space permanently or temporarily until which time it's required for the expansion of public transport facilities would be better 	<p>The proposed development provides significant public domain upgrades which will support the train station and bus interchange located adjacent to the site. Transport for NSW does not have ownership of the site, and sold the land to UPG to facilitate the proposed development. In light of the current housing crisis in Sydney, the proposed development is suitable for the site, providing high quality housing and public domain upgrades in a well-located area.</p>
<ul style="list-style-type: none"> - The lack of 3 bedroom apartments for growing families is disappointing 	<p>The proposed development provides 44 x 3-bedroom dwellings, which is approximately 6.1% of total dwellings provided. While slightly below the Parramatta DCP 2023 control, the proposed apartment mix is entirely appropriate for the proposed use of the development as build-to-rent housing, and is directly aligned with the market demand for housing within Parramatta.</p> <p>Furthermore, and as detailed within Section 4.3 of the Submissions and Amendment Report, the proposal has been designed accordingly to ensure flexible and adaptable floor plates, meaning that units can be readily converted to achieve more larger units, should the market evolve.</p>
<ul style="list-style-type: none"> - negatively impacting my family's apartment which we have purchased using many years of hard-earned savings 	<p>The assessment contained within the EIS and Submissions and Amendment Report demonstrates that the proposal is consistent with the applicable planning controls and strategic planning framework for the Parramatta CBD. Detailed studies have been undertaken to demonstrate that the proposal will not result in adverse impacts on surrounding properties, that cannot be appropriately mitigated.</p>