

14 January 2026

Hilary Apitz
Freecity group
Level 1, 8 Khartoum Road
Macquarie Park NSW 2113

Dear Hilary,

1 Barrack Lane, 81-83 George Street Build-to-Rent Development (SSD-79439459): Response to Submissions – Heritage

Urbis have been engaged by Freecity Parramatta Development No 1 Pty Ltd to provide ongoing heritage consultation advice in regard to the subject site located at 1 Barrack Lane and 81-83 George Street, Parramatta, which is legally described as Lot 101 DP 1110883, Lot 1 DP 628004 and Lot 250 in DP 1287232.

Development on the subject site is not assessed to be of heritage significance and none of the buildings are listed heritage items, however part of the southern portion of the site, comprising 1 Barrack Lane (Lot 101 DP 1110883) is located within the state listed heritage curtilage of the State Heritage Item 00709, *Warders Cottages*. The Warders Cottages building itself is located on a separate allotment (Lot 231 DP 1287164) and does not form part of the subject site and is not included in the subject SSDA.

The subject site also comprises part of the Local Heritage Item No. 1453 (as listed under Part 1 Heritage Items of Schedule 05 of the Parramatta Local Environmental Plan 2023) being the *Convict drain*. The drain traverses the site below ground in a northeasterly / south-westerly direction. In addition, the Moreton Bay Fig Tree located in the north-west corner of the subject site is included in the State & local Heritage listing for Perth House, located on the adjacent site (SHR 00155 & 1539)

SSDA Application SSD-79439459 was lodged by Freecity Parramatta Development No 1 Pty Ltd in November 2025 seeking development consent for the demolition of existing structures (including nos. 81 and 83 George Street, and 1 Barrack Lane) and the construction of a 40 storey mixed use development with ground floor retail and a build-to-rent (BTR) tower. Specifically, the proposal comprises the following:

- The demolition of existing site structures and the removal of two trees.
- The construction of a forty storey mixed-use development comprising:
 - Site preparation works including preparatory earthworks.
 - A three storey podium including:
 - Ground floor: a flexible retail area and a retail tenancy, a build-to-rent lobby and management area, services and waste rooms, separate vehicle entries for residential use and service use, 4 parking spaces for service vehicles, bike repair facilities and 40 bicycle parking spaces,
 - First level: 32 car parking spaces, inclusive of 2 accessible spaces, 214 bicycle parking spaces, 7 motorcycle parking space, a residential storage area and services,
 - Second level: 39 car parking spaces, inclusive of 2 accessible spaces, 170 bicycle parking spaces, 7 motorcycle parking spaces, a residential storage area and services,
 - Upper podium level providing communal open space and amenities.
 - A thirty-seven (37) storey residential tower incorporating 383 BTR units.
- Installation of a new substation and infrastructure connections as required.
- Associated landscaping and public domain works.
- Extended hours of construction.

This letter has been prepared to respond to the RTS themes broadly and specifically submitted by agencies and City of Parramatta Council as outlined in the key issues letter by the Department of Planning, Housing and Infrastructure, dated 24 December 2025. It addresses both built heritage and archaeological issues.

City of Parramatta Council and Agency Submissions

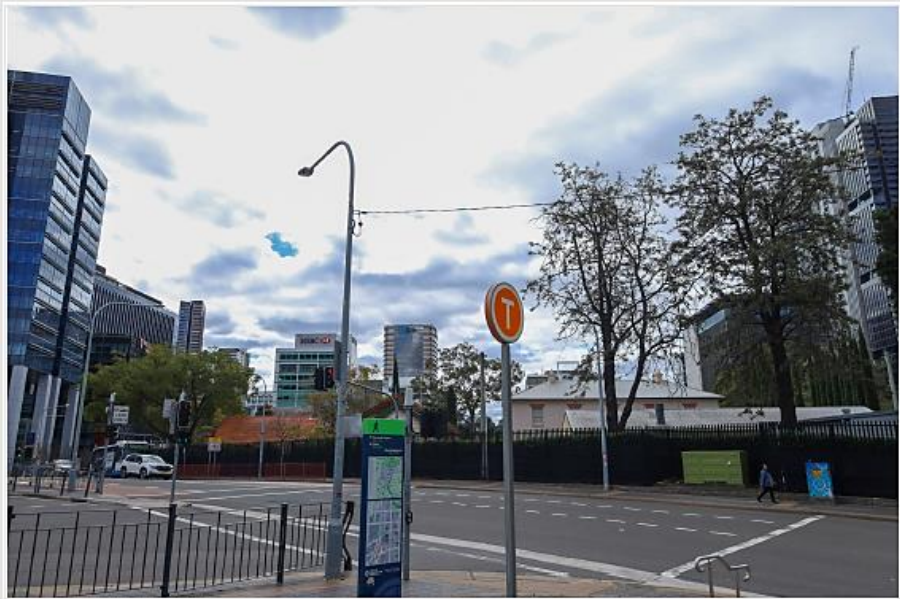
The Council and agency submissions relating to heritage issues are included in Table 1 on the following page.

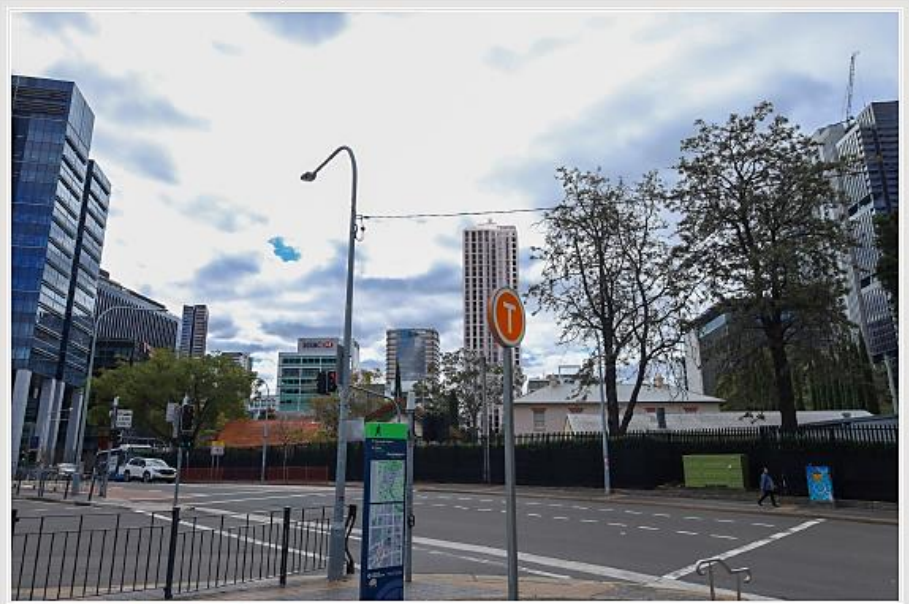
Table 1 Council and Agency Submissions – Heritage Matters

Item Ref.	Summary of Matters Raised	Response
City of Parramatta Council		
Key Matters		
COP-2	Conservation Management Plans ('CMPs') – The proposal does not include updated Conservation Management Plans for Perth House or the Warders Cottage as required by clause 7.22(3) of the PLEP 2023 and as such cannot be approved. The CMPs must demonstrate that the proposed lot amalgamation sufficiently protects the significance of the heritage items, and if it does, demonstrate that development on the adjoining sites (in particular 85 George Street) can accommodate development of a similar scale without unduly impacting the heritage significance of the adjacent items.	The subject site comprises 81–83 George Street and 1 Barrack Lane, Parramatta. Development on the subject site is not assessed to be of heritage significance and none of the buildings are listed heritage items, however part of the southern portion of the site, comprising 1 Barrack Lane (Lot 101 DP 1110883) is located within the state listed heritage curtilage of the State Heritage Item 00709, <i>Warders Cottages</i>. The Warders Cottages building itself is located on a separate allotment (Lot 231 DP 1287164) and does not form part of the subject site, although the south-east corner of the subject site is located within the State heritage curtilage of the Warders Cottages (SHR 00709). Similarly, Perth House is located on a separate allotment (Lot 260 DP 1287233) does not form part of the subject site. The subject site also comprises part of the Local Heritage Item No. 1453 (as listed under Part 1 Heritage Items of Schedule 05 of the Parramatta Local Environmental Plan 2023) being the <i>Convict drain</i>. In addition, the Moreton Bay Fig Tree located in the north-west corner of the subject site is included in the State & local Heritage listing for Perth House, located on the adjacent site (SHR 00155 & 1539). Regardless that both Perth House and Warders Cottages are on separate allotments, with the latter also in separate ownership, the site owners are progressing a coordinated development pathway across the adjoining sites that responds to its complex ownership structure, statutory controls, and heritage significance as described in the letter of intent prepared by Freecity Group, dated 13 January 2026. The letter documents the intention to progress a precinct Conservation Management Plan to provide the primary framework for the conservation and management of each heritage item and associated curtilage on and adjoining the subject site, including Perth House and the Warders Cottages, and the collective approach. The intention is for test excavation to inform development of the CMP brief to facilitate a coordinated approach to the conservation and management of the respective allotments.

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		Reference should be made to the letter of intent prepared by the owner, Freecity Group, dated 13 January 2026 in relation to the planning and heritage management objectives for redevelopment of land at 89–91 George Street, 81–83 George Street, and 1 Barrack Lane Parramatta.
Detailed Objections / Comments		
Heritage		
COP-6	Fig Tree Impact The proposal is located such that construction will likely require pruning of the heritage fig on site. Further setbacks from the tree, as outlined in the Urban Design response below, should resolve this concern. To protect the historic Moreton Bay Fig tree during construction, a protection methodology should be prepared by a qualified arborist.	The Arboricultural Impact Assessment (Appendix M) includes detailed tree protection controls to ensure that the health and viability of the Moreton Bay fig tree is not compromised by any construction activities.
COP-7	Management Plan Clause 7.22 of PLEP 2023 seeks to ensure that development relates appropriately to heritage items. Sub-clause (3) also requires the consent authority to consider – where there is lot amalgamation proposed – a heritage conservation management plan that identifies whether: (i) further lot amalgamations will be required to support the development of the land, while retaining the heritage significance of the heritage item, and (ii) the significance of the heritage item has been prioritised in the amalgamation of the lots, The applicant has referenced the existing 2004 Conservation Management Plan for Perth House as being sufficient. No Conservation Management Plan for the Warders Cottage has been prepared.	Perth House is subject to a Conservation Management Plan which was considered in the submitted Heritage Impact Statement. It is acknowledged that heritage best practice recommends updating Conservation Plans every 5-10 years or in conjunction with major works affecting the item. With this consideration in mind, please see response to COP-2 describing the objective for a coordinated approach to the conservation and management of the subject site and adjoining allotments Where an update to the CMP is required, this may be prepared as part of SSDA conditions of consent.

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COP-8	Heritage Interpretation A heritage interpretation condition should be included in any consent. This should identify significant themes and narratives for interpretation and outline potential locations, media, and indicative content.	Noted. The Proponent would accept a condition of consent as suggested and as recommended in the HIS.
Heritage NSW (HNSW)		
Associated Development Applications		
HNSW-1	Heritage NSW notes that a Development Application (DA/635/2025) has been lodged with Parramatta City Council to enable the demolition of existing site structures, tree removal and the installation of construction hoardings. This matter has been referred to Heritage NSW separately as a part of the Integrated Development Application process.	Noted.
Built Heritage		
HNSW-2	Please provide an assessment of impacts of the proposed SSD on the Commonwealth heritage listed Lancer Barracks (Place ID 105214) and Lancer Barracks Precinct (Place ID 105512), which is in the vicinity of the SSD site.	The subject site is located in the Parramatta CBD context with frontage to George Street, which is recognised for its historical associations and extent heritage items. The Lancer Barracks site is located approximately 200 metres to the southwest of the site and has frontage to Station Street East / Smith Street. Development in the intervening space includes school premises at Arthur Phillip High School and Parramatta Public School. In terms of the broader setting and context, the Lancer Barracks precinct is located within an evolving CBD environment which is characterised by mixed development of varied phases and typologies, including historic development and contemporary high rise. This includes the 34 storey Walker Corporation tower and other high rise

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		development on the site of Parramatta Square to the immediate west of the Barracks at Parramatta Square. From the Lancer Barracks, these existing buildings will remain the primary visual elements in the immediate context of the Barracks site. To the north east, owing to the lower scale of the intervening school sites, the proposed development would be visible in the background from the Lancer Barracks and Station Street East / Smith Street, forming part of a mixed viewscape of development including high rise development, which is consistent with the existing backdrop of towers to the north, east and west of the Lancer Barracks, as illustrated in viewpoint 16 in the submitted Visual Impact Assessment (Appendix T) and included below. VIEWPOINT 16  Existing site photo From a standing position at Telstra Payphone, 1 Station Street. RL + 17.83m - Distance to boundary 296.75m Camera - Canon RP Lens - 24mm

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		 Photomontage of Proposal It is noted that Lancer Barracks is enclosed around its boundary by a tall black steel palisade fence, which has the effect of a visual barrier and the perception that the site has an inward focus on its own grounds and property. Looking out, the site enjoys a low scale setting to the south and west established by virtue of the wide intersection between Station Street East and Hassell Street and the open rail corridor beyond the intersection which will not be affected by the proposal. Furthermore, substantial sky views would remain available in views to the north east. Therefore, as a background element in views associated with the Lancer Barracks, the proposal is assessed to have little to no impact on the Barracks site.

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North west view to Lancer Barracks from Station Street East showing boundary fencing

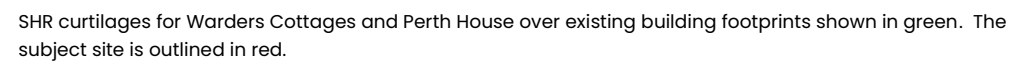
The Parramatta LEP 2023 stipulates the following requirements relating to sun access to sites including the Lancer Barracks in Part 7, Additional Local Provisions – Parramatta City Centre:

Division 2 Development Standards Generally, 7.7 Sun access

(3) Development consent must not be granted to development on the land if a building resulting from the development will create additional overshadowing, on 21 June in any year, on the land shown with blue hatching on the Sun Access Protection Map during the following times—

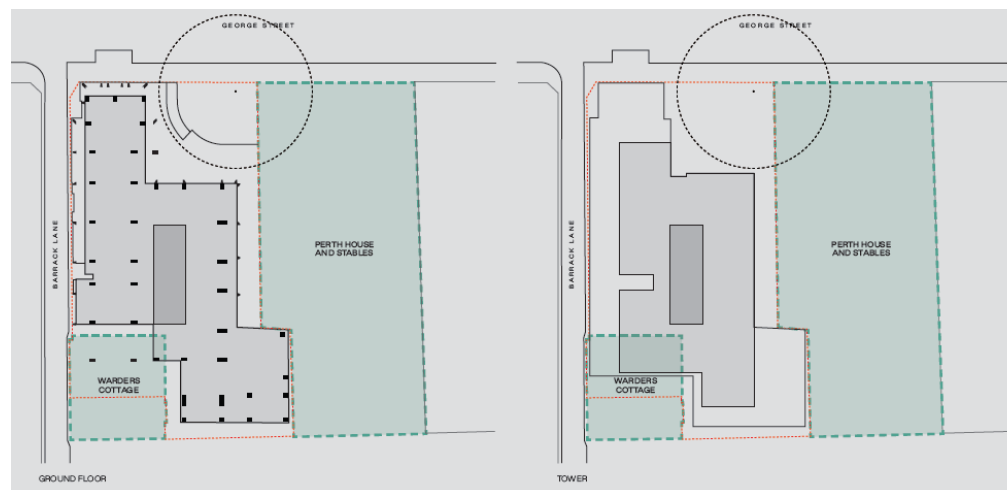
(c) for the Lancer Barracks site—between midday and 2pm,

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	Shadow diagrams provided with the architectural drawings demonstrate that the proposed scheme does not create any additional overshadowing to the Barracks site at any time of day. With reference to the specific LEP requirement, diagrams have been included below that show the overshadowing between 12 and 2pm on the Winter Solstice (21/06). Reference should be made to the submitted SSDA drawing package by FK Architects Drawing Number DA405 Revision A, 07/10/2025 which provides additional times and illustrates that no overshadowing will occur within the Lancer Barracks site. Shadow studies have been prepared based on the 3D model provided by Parramatta City Council. 
HNSW-3 Please provide overlays to clearly illustrate which parts of the SSD—podium and tower—would be located within the SHR curtilage of Warders Cottages.	Reference should be made to overlays provided by FK which show the extent of the works within the curtilage in plan, both in the ground plane and at tower level (see excerpt below).



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SHR curtilages for Warders Cottages and Perth House over proposed building footprints at Ground Floor (left) and tower level (right) shown in green.

The State Heritage Register curtilage for the Warders Cottages (State heritage item 00709), includes the heritage cottage row at 3 Barrack Lane and the three-storey commercial building (constructed between 1987 and 1991) at 1 Barrack Lane. The subject site includes the commercial building at 1 Barrack Lane but excludes the Warders Cottages at 1 Barrack Lane.

Within the SHR curtilage of the Warders Cottages at the Ground Floor level, the proposal has provided a considered response by providing a generous setback at ground level, which would allow flexibility for future uses and activation of the Warders Cottages. In this way, the proposal has focused on improving the setting through activating the interface with the Warders Cottages, which is currently defined as a utility zone surrounded on all sides by vehicle entries, parking and loading bays.

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		Within the SHR curtilage of the Warders Cottages above the Ground Floor plane, new built form development is proposed. The massing of the development is broken down with the creation of the 3-storey podium and separate tower form, in which pedestrian views would be contained within the lower scale components. The overhang of the podium within the curtilage of the Warders Cottages contributes to the establishment of an intimate and contained outdoor space that is of a compatible scale to the heritage building and as a result of the establishment of this open space setting, there will be enhanced views both to and from the building. Development within the SHR curtilage of the Warders Cottages is therefore assessed to have an acceptable heritage impact as the proposal will facilitate improvement of the setting and enhanced opportunities for public appreciation of the heritage building.
HNSW-4	It is noted that the design does not include a ground floor through-link between Perth House and the Warders Cottages. Please provide justification for excluding such a link from the design noting that the SSD design will result in the isolation of the Warders Cottages in a back-of-house services zone.	The possibility of creating a physical connection between Perth House and the Warders Cottages has been considered as part of the site planning and urban design process. However, establishing such a connection has been found to be not feasible for several urban, operational and safety-related reasons. Considering the site geometry and the relative position of Perth House and the Warders Cottages, investigation during design found that establishing a link would create a long and narrow route with low-visibility that would be difficult to surveil and manage. Given the surrounding building heights and the depth of the site, this space would be prone to poor daylight access and ventilation, creating a dark and inactive environment that raises safety and security concerns for both residents and the public, which is undesirable from a CPTED perspective. The creation of a connection along the eastern edge of the site would also have significant operational implications. The present design provides for loading, waste and back-of-house functions to be strategically consolidated in a location that minimises their impact on the public domain and allows George Street and Barrack Lane to be maximised as active frontages. To facilitate a through-site link, essential servicing functions would need to be relocated to the Barrack Lane frontage, which would compromise this outcome and reduce opportunities for retail activation.

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		From a commercial and placemaking perspective, the proposed connection would be challenging to activate. Limited solar access and lack of continuous foot traffic would make the space unattractive and commercially unviable for retail or hospitality uses. This would risk creating an underutilised laneway rather than a positive public space. In its current siting at the rear of the property, the Warders Cottages has no visual or physical connection with Perth House and its immediate laneway setting reads as a utility zone being surrounded on all sides by vehicle entries, parking and loading bays for neighbouring development, all accessed via the lane. The proposal has focused on improving the setting through activating the interface with the Warders Cottages in a more controlled and adaptable manner. A generous setback has been provided to allow flexibility for future uses of the Warders Cottages, which are currently undefined (being under separate ownership). This approach enables the interface to respond to a range of potential programs while maintaining clear sightlines, daylight access and passive surveillance. The fabric Warders Cottages will be retained and the item will retain its ability to demonstrate the early colonial period history of Parramatta in accordance with its assessed significance. The interface is further enhanced through an activated bicycle entry for residents, supporting movement and day-to-day activity, and a continuous wall condition that provides opportunities for integrated public art and interpretation. This strategy provides a considered ground plane design to enhance the setting to the Warders Cottages without introducing a problematic through-site connection. Overall, the proposed approach achieves a balanced outcome that prioritises safety, activation, operational efficiency and long-term adaptability, while respecting the heritage significance of both Perth House and the Warders Cottages.
HNSW-5	The Place Plan in Appendix BA of the EIS states that the development is intended to form part of a precinct with Perth House and the Fig Tree at its centre, but the SSD does not include any physical integration between the two. A change in ground level along the eastern boundary of the SSD site serves to exacerbate the separation. Please	The proposal has been developed with consideration for the activation and interface with neighbouring properties and streets from all sides, and seeks to address the eastern frontage and Perth House and stables through setbacks, façade design, materiality and ground floor retail activation.

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	provide more information on how the proposed 'precinct' will be achieved.	At this stage, the project team is actively exploring ways to integrate with adjoining sites to deliver a coordinated, precinct-based outcome in terms of connectivity, amenity, and long-term urban performance. The current proposal for 1 Barrack Lane and 81-83 George Street has considered the following in regard to future Precinct activation: • Align built form and public realm interfaces with neighbouring properties. • Complementary uses and activity zones that strengthen the precinct's identity. • Enhance environmental and social outcomes through integrated open space and public facilities. This process involves ongoing engagement with landowners, stakeholders, and relevant authorities to ensure that any integration opportunities are practical, mutually beneficial, and consistent with planning objectives. To this effect, it is noted that the site of Perth House and the Stables, located at 85 George Street (Strata Plan SP74416 Lot 1 and Lot 2) and the adjoining site of 89-91 George Street to its west are under the same ownership as the subject site, which will contribute to a collaborative approach. The aim is to ensure the final design not only meets the needs of the site but also contributes meaningfully to the wider precinct vision, the outcomes of which will be facilitated in the first instance by the current proposal. Reference should be made to the letter of intent prepared by the owner, Freecity Group, dated 13 January 2026 in relation to the planning and heritage management objectives for redevelopment of land at 89-91 George Street, 81-83 George Street, and 1 Barrack Lane Parramatta.
HNSW-6	Although there is a 4,500mm setback between the podium and the Perth House stables building at ground floor level, this setback is reduced to just 2,650mm for the upper levels of the podium. Please advise on why this setback cannot be increased to allow a wider visual buffer zone around the stables building.	The proposal is broadly consistent with the approved concept envelope for the subject site, (approved by the Sydney Central Planning Panel in December 2023 under DA/937/2022). The proposal provides a larger setback in the ground plane than the approved concept envelope. The ground plane is the primary contributor to the pedestrian experience and therefore, the larger setback at ground level improves the interface with the Stables from the approved concept envelope. With consideration

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		for this and the feedback provided, refinement of the design has been investigated to enhance the open space character adjacent to the Stables. A comparison of the current and revised proposed interface is demonstrated in montages prepared by FK, extracts of which are provided below.  Photomontage of SSDA scheme showing proposed building adjacent to the stables.

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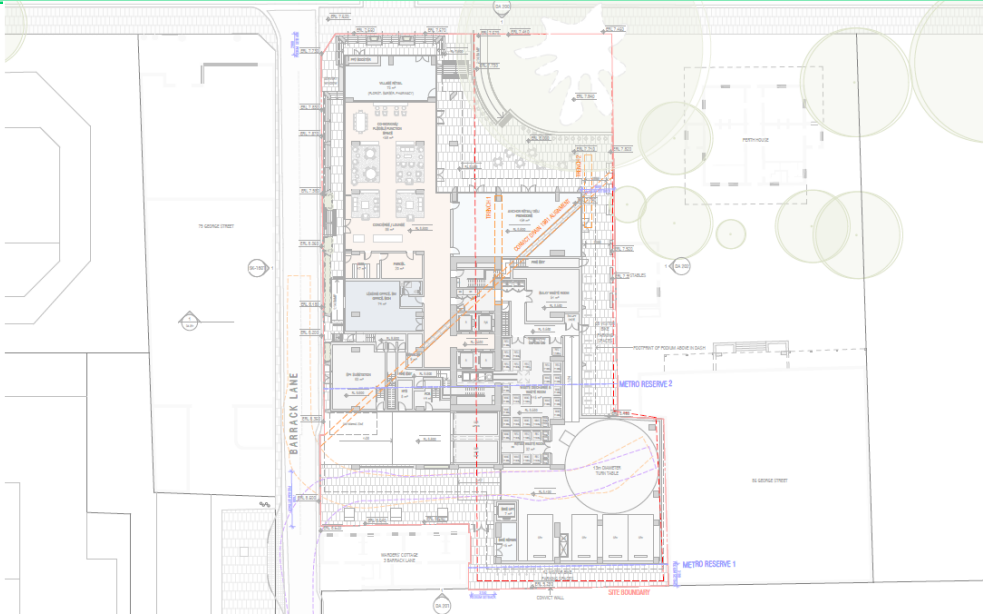


Photomontage of RTS scheme showing proposed building adjacent to the stables. Included in this submission.

The larger setback for the podium from the ground level, ensures the Stables are able to be viewed and appreciated in the round as part of an activated ground plane. This is substantially enhanced by the revised scheme which removes the external colonnade adjacent to the Stables and rather aligns the structure with the building envelope, with the cantilevered soffit of the first floor at a compatible datum with the guttering of the Stables. Further amendment to the fenestration in the building return to the south of the Stables provides a neutral background against which the Stables will be visually distinguished and remain clearly legible as an outbuilding associated with Perth House. Views between Perth House and the Stables are unchanged. Noting

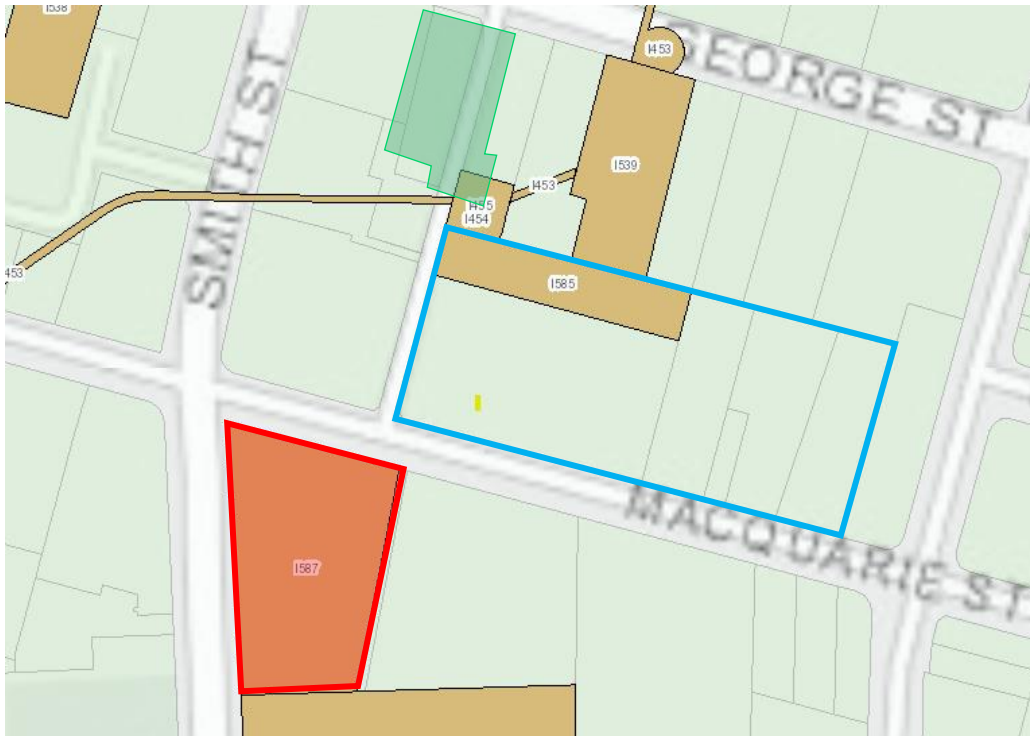
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HNSW-7	Existing trees, including Tree 4 (proposed to be removed) help soften the immediate setting of Perth House. Please justify the omission of trees from the ground level landscape proposed for the eastern side of the SSD.	that the tower and podium will form a backdrop to the Stables in westerly views, a further setback at the upper levels will not substantially alter the proposal and the setting relative to the Stables. The immediate setting of Perth House will continue to benefit from the mature Moreton Bay fig (<i>Ficus macrophylla</i>). This is the major defining landscape element in the locality and its scale and siting close to George Street will ensure that it remains prominent. Within the neighbouring site of Perth House, the existing vegetation to the immediate east, south and west are not affected by the proposal and will continue to contribute to the setting of Perth House, in conjunction with other lower scale plantings on the adjoining site including in the immediate setting of the Stables building. Considering this, the heritage impact of removal of trees on the subject site as proposed is assessed to be minor and is likely to reduce maintenance requirements for the Stables building associated with overhanging vegetation. There will be opportunity to further consider landscaping across the ground plane in the context of the objective for a precinct-based response as outlined at HNSW 5.
HNSW-8	The Noise and Vibration Impact Assessment (NVIA) in Appendix Z of the EIS does not identify the heritage items adjacent to the site (Perth House and Stables, Warders Cottages and Convict Barracks Wall). Please confirm that the findings and recommendations of the NVIA report in relation to construction vibrations would be relevant to these items or update the report as required, noting that the SSD is in very close proximity to the heritage items.	A Construction Noise and Vibration Memorandum accompanies this submission which provides further recommendations for vibration monitoring proximate to heritage items.
Historical Archaeology		
HNSW-9	Heritage NSW and Urbis have engaged prior to submission of the EIS regarding the proposed test excavation program to identify and assess the archaeological resource in the	Noted.

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	proposed SSD site, with the intent of commencing testing before determination of the SSD application.	
HNSW-10	It is noted that the aims of this test excavation program are to inform the detailed design of the proposed works and propose appropriate avoidance or mitigation measures for State significant archaeology.	Noted.
HNSW-11	Following pre-lodgement consultation the Historical Archaeological Impact Assessment and the Historical Archaeological Research Design & Excavation Methodology have been updated.	The updated Archaeological Impact Assessment and the updated Historical Archaeological Research Design & Excavation methodology accompany this submission.
HNSW-12	Heritage NSW is supportive of the testing methodology provided in the updated HAIA and HARDEM, and advocates for early identification and consideration of archaeology to minimise impacts through design. We advise that the current approach for the management of State significant archaeology is preservation and conservation in situ as the preferred heritage outcome.	Noted.
HNSW-13	Following review of the EIS, it appears that the mapped alignment of the Convict Drain shown in the Architectural Plans and Structural Design Report in Appendices E and AR of the EIS are based on the alignment provided in historical plans (shown as the 1844 plan alignment in Figure 34 of the HAIA), while the results of previous archaeological investigations suggest that its actual alignment may be further to the south, in an area which may be impacted by the proposed lift well.	The results of the proposed test excavation will better identify the location and integrity of the Convict Drain. The plan available from the previous investigations carried out in the 1980s is of poor quality and the intention of the current program is to better ground-truth these remains. An updated plan with overlay of the 1980s alignment has been prepared by FK with excerpt included below.

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		 DA 100a Ground Floor Plan mapping location of the convict drain as documented in 1981
HNSW-14	Further design development should ensure that the results of the archaeological research and test excavations (when available) are considered when finalising areas which require deeper excavation. We note that the Structural Design Report makes provision for review of the structural design to accommodate any findings of the archaeological investigations.	Once test excavation is undertaken, the project archaeologist will work with the design team to ensure that the results of the test excavation are considered through design development.
HNSW-15	Following completion of test excavations, detailed advice will be provided to Planning regarding the adequacy of the	Following completion of the test excavations an Interim Test Excavation Report will be completed and submitted for consideration, which will address the matters listed.

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	assessment and recommendations for the management of historical archaeology. To inform this assessment and advice, the following information is requested: An interim test excavation report completed in accordance with the methodology provided in the updated HARDEM and including: a. A detailed impact assessment taking into account current development plans. b. Recommendations to inform the detailed design of the proposed development, including proposed measures to avoid impacts to State significant archaeology and any other mitigation measures.	
HNSW comments relating to Aboriginal cultural heritage		
HNSW-16	Heritage NSW is supportive of the testing methodology provided in the updated AARDEM, and advocates for early identification and consideration of archaeology to minimise impacts through design and develop appropriate mitigation measures in consultation with the Registered Aboriginal Parties for the project.	Noted.
HNSW-17	Following completion of test excavations, detailed advice will be provided to Planning regarding the adequacy of the assessment and recommendations for the management of Aboriginal cultural heritage. To inform this assessment and advice, the following information is requested:	Following completion of test excavation an Archaeological Technical Report will be completed including the results of test excavation. This report will provide updated impact assessment and recommendations based on the results of test excavation.

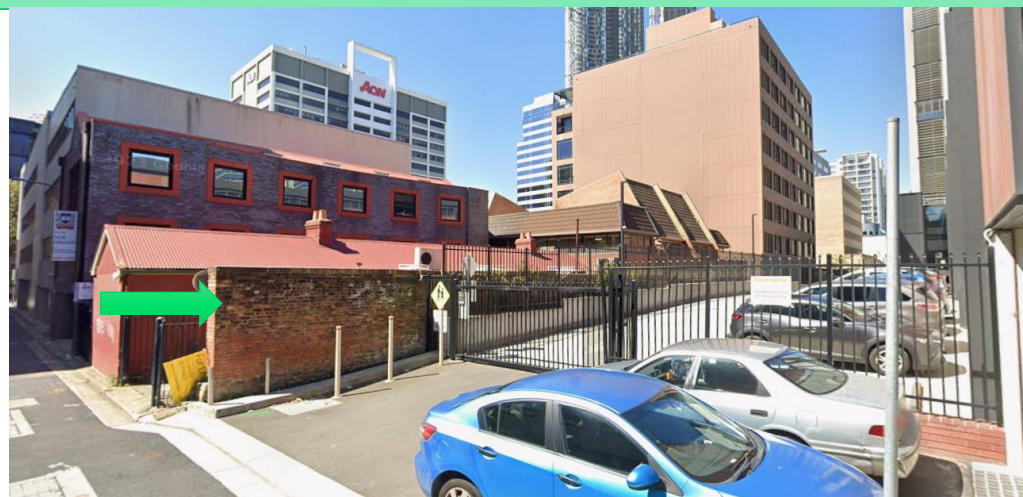
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	1. An Archaeological Technical Report completed in accordance with the methodology provided in the updated AARDEM and including: a. A detailed impact assessment taking into account current development plans. b. Recommendations to inform the detailed design of the proposed development, including proposed measures to retain or mitigate impacts to Aboriginal cultural heritage.	
HNSW-18	Please provide evidence of consultation correspondence demonstrating that all Registered Aboriginal Parties were provided the Project Information and Methodology for review. This may include documentation such as copies of dated email records with all relevant email addresses shown.	Urbis provided all Registered Aboriginal Parties with the project information and methodology for review on 17 April 2025 via email. This email is provided in the RTS package.
Department of Education		
Heritage and Visual Impact		
DoE-1	The department requests that the following heritage impacts be accurately assessed and EIS and the design amended as required as follows: Include the adjacent listed items of Arthur Phillip High School (Item 587), Parramatta Public school (department's s170 Register), and the Lancer Barracks (Item 645) in the heritage assessment and reference to impacted items in the vicinity.	Further assessment of the heritage impacts of the proposal on the Lancer Barracks has been included above in the response to HNSW wherein the proposal is assessed to have little to no impact on the Barracks site (refer to Item reference HNSW-2), as visually the proposed development would be one component of the backdrop of a heightened CBD context that is becoming an integral part of the character of longer range views towards the Parramatta CBD, and further does not overshadow the site at critical times as identified in Parramatta LEP 2023. The site is adjacent to Arthur Phillip High School to the south and the former Parramatta Public School is located opposite Arthur Phillip High School, on the

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		southern side of Macquarie Street (now forming part of the redeveloped high school). The school site is not listed in its entirety – see below excerpt of the LEP Heritage Map which shows the subject site indicated in green, the approximate area of the northern portion of Arthur Phillip school in blue, and the listed curtilage of the Public School in red. The heritage item indicated adjacent to the subject site, being Item 585 (within the northern part of APHS) refers to the convict barracks wall, which was assessed in detail in the submitted HIS. The northern portion of the Arthur Phillip school site (indicated in blue) is itself a recent redevelopment, being NSW first high-rise school, completed in 2019. 

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		The listed curtilage of the Parramatta Public School (item 587 indicated in red), similar to the Lancer Barracks, is located in a changing urban environment which includes mixed and high-rise development in line with the CBD location including Parramatta Square to the west. The significant school buildings are distanced from the subject development and the proposal will not impact on its historic and aesthetic values as early 19th century school buildings.
DoE-2	Include an assessment of the visual and setting impacts of the proposed development on the heritage items to the south of the tower including Arthur Phillip High School (items 585, and 587) and Parramatta Public School (department's s170 Register).	The Barracks wall is located on the southern boundary of the site, adjoining the Arthur Phillip High School site. The convict barracks wall (Item No. I585) is of historical and scientific significance as a rare surviving remnant of the early colonial period history of Parramatta and the associated town planning practices, then widely used. In its present arrangement, it is primarily visible from Barrack Lane, behind the Warders cottages. It has some visibility within the school site although it has been relegated to a back of house parking area, as part of the 2017-2019 Arthur Phillip High School redevelopment. There has been some change to the ground levels and there is a new fence and retaining wall within the school site which has been constructed in front of and partly obscures the wall (refer to the street view below from Barrack Lane with the wall indicated and the rear of the Warders Cottages beyond).

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In the context of the proposed redevelopment, the wall will continue to be read as a surviving remnant in a greatly altered urban environment. Importantly it will retain its visual relationship and association with the Warders cottages. The subject proposal has sought to mitigate impacts to the wall and provides a setback of approximately 3m at the ground level to allow for the maintenance and interpretation of the wall. It remains visible primarily from Barrack Lane, in conjunction with the Warders Cottages, consistent with its current arrangement and setting. There is an opportunity to enhance appreciation of the wall through heritage interpretation.

As outlined in item reference DOE-1 above, the listed curtilage of the former Parramatta Public school is limited to the early school building and immediate setting, at the corner of Macquarie and Smith Streets. The heritage item is located within an altered and developed context, which includes high rise development to the west at Parramatta Square and on Macquarie Street, including the new Arthur Phillip High School and residential development. In this context, the subject proposal is not considered to have a significant further impact.

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DoE-3	Include an adequate assessment of the visual impact of the increased height on key heritage views of the school from the Railway Station (East) across the Lancer Barracks and school sites.	No significant heritage views are identified in the Parramatta DCP 2023 part 9.4.7. The Arthur Phillip High School (Item 587), Parramatta Public School (department's s170 Register) and the Lancer Barracks (Item 645) are located within an evolving CBD environment which is characterised by mixed development of varied phases and typologies, including historic development and contemporary high rise. This includes the 34 storey Walker Corporation tower and other multi storey development on the site of Parramatta Square are prominent, including Western Sydney University Parramatta City Campus Buildings to the west of the Lancer Barracks and Parramatta Public School. In views to the north east, the proposed development would be visible in the background from the from the Railway Station (East) across the Lancer Barracks and school sites as illustrated in viewpoint 16 in the submitted VIA (refer to Item reference HNSW-2). The proposal is assessed to have little to no visual impact on the Arthur Phillip High School (Item 587), Parramatta Public School (department's s170 Register) and the Lancer Barracks (Item 645) sites as the proposed development would be one component of the backdrop of a heightened CBD context that is becoming an integral part of the character of longer range views towards the Parramatta CBD and substantial sky views would remain available in views to the north east. Considering the existing highly altered streetscape, which includes the new high-rise school, the proposed development is not considered to have a significant further impact on the setting or significance of the nominated heritage items. These would retain primary visual relationships with existing development in their immediate contexts, which includes multiple high rise development. Refer to view images below.

Item Ref.	Summary of Matters Raised	Response
		 views of the Lancer Barracks and Station Street East, shown in the context of new development and with high rise development to the northeast  View west on Macquarie Street showing Parramatta Primary School site and more recent development in the immediate context

Item Ref.	Summary of Matters Raised	Response
DoE-4	Include an assessment and demonstrate acceptable impacts to the open space area for Arthur Phillip High School and Parramatta Public School from overshadowing through winter during school hours. Impacts to the Lancer Barracks site to the south of the school should also be addressed, particularly given it is listed for solar protection in the Parramatta Development Control Plan 2023 (PDCP) and will also be impacted by the shadowing.	Refer to Item reference DoE-3 for assessment of visual impacts. The school site is not listed in its entirety – see excerpt of the LEP Heritage Map and discussion at DoE-1. The heritage item indicated adjacent to the subject site, being Item 585 (within the northern part of APHS) refers to the convict barracks wall, which was assessed in detail in the submitted HIS. The northern portion of the Arthur Phillip school site (indicated in blue) is itself a recent redevelopment, being NSW first high-rise school, completed in 2019. For an assessment on the open areas of the Arthur Phillip High School, refer to the detailed response from Planning. The Convict Barracks Wall, the local heritage item located within this site, is currently largely overshadowed by existing built form located on the subject site and to the north along the boundary of the Arthur Phillip site, which is not unusual in a CBD context. Therefore, the proposal does not alter the existing degree of overshadowing of the heritage item located within the Arthur Phillip School site. In regard to the Parramatta Public School, an item of Local heritage significance, there will be overshadowing caused by the proposal however, this is limited to the morning. Reference should be made to the submitted SSDA drawing package by FK Architects Drawing Number DA405 Revision A, 07/10/2025. These diagrams illustrate that by 11am the proposed tower will not have overshadowing impacts on the Public-School site. This is due to its location to the south-west of the subject site. Overall, the heritage site will have solar access from the 11am-1pm. Afternoon overshadowing is caused by existing built form within the CBD. In regard to impacts to the Lancer Barracks site from overshadowing, the Shadow diagrams provided with the architectural drawings demonstrate that the proposed scheme <u>does not</u> create any additional overshadowing to the Barracks site between 12 and 2pm on the Winter Solstice (21/06) which is in line with Part 7 of the <i>Parramatta LEP 2023</i> which stipulates the following requirements relating to sun access for the Lancer Barracks:

Division 2 Development Standards Generally, 7.7 Sun access

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		(3) Development consent must not be granted to development on the land if a building resulting from the development will create additional overshadowing, <u>on 21 June in any year, on the land shown with blue hatching on the Sun Access Protection Map during the following times—</u> (c) for the Lancer Barracks site—between midday and 2pm, Reference should be made to the submitted SSDA drawing package by FK Architects Drawing Number DA405 Revision A, 07/10/2025 (excerpt below). Shadow studies have been prepared based on the 3D model provided by Parramatta City Council. 
DoE-5	Inclusion in the Heritage Impact Statement and proposal of measures to conserve and protect the shared heritage item of the Convict Barracks wall. A 3m setback for the development will enable future access to the wall but does not address the construction impacts of such major works	Consistent with established best practice in construction in Australia, ensuring the ongoing maintenance and conservation of the wall during construction is a matter to be managed as part of the Construction Management Plan (CMP). The submitted Heritage Impact Statement included the following recommendation:

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	on the wall, and it is considered that the impact statement did not provide adequate controls for construction works to preserve it in its current condition. As the convict wall represents the boundary between the department's property and the proposed development, impacts to this heritage significant structure would also have operational impacts to the boundary of the school; a 3m exclusion zone is completely inadequate to prevent these impact	<i>Prior to the issue of a Construction Certificate, a Protection Methodology should be prepared for the heritage items by a suitably qualified contractor with review by the project heritage consultant.</i> It is anticipated that a Construction Management Plan will be required as part of DA conditions of consent. A Construction Noise and Vibration Memorandum accompanies this submission which provides further recommendations for vibration monitoring proximate to heritage items, this includes the Convict Wall (Item no. 585).
DoE-6	The heritage and planning assessments for the proposal should include an assessment of impact of the increased height of the building outside the generally higher rise CBD areas, and any precedent setting or cumulative impact for proposed future developments, on the lower rise and heritage rich precincts to the south and east of the site, incorporating the two School heritage sites.	The site is located within the Parramatta City Centre as described in the Parramatta DCP 2023 (refer Chapter 9 Parramatta City Centre, Figure 9.1.1 – Land Application Map – Parramatta City Centre – excerpt below).

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9.1.1 APPLICATION

The controls in this Part apply to the Parramatta City Centre the Land Application Map, below. The controls in this Part support the controls contained in Part 7 of Parramatta LEP 2023.

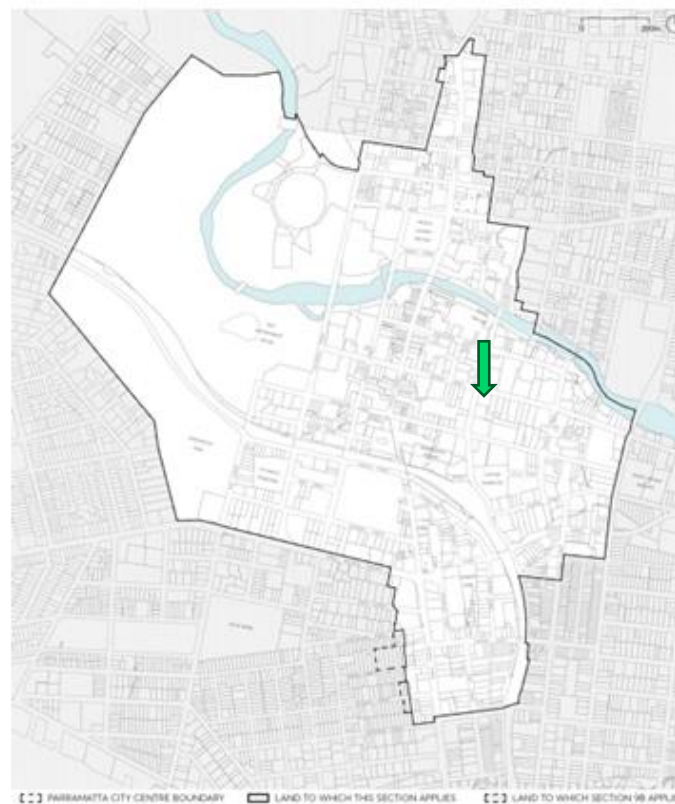


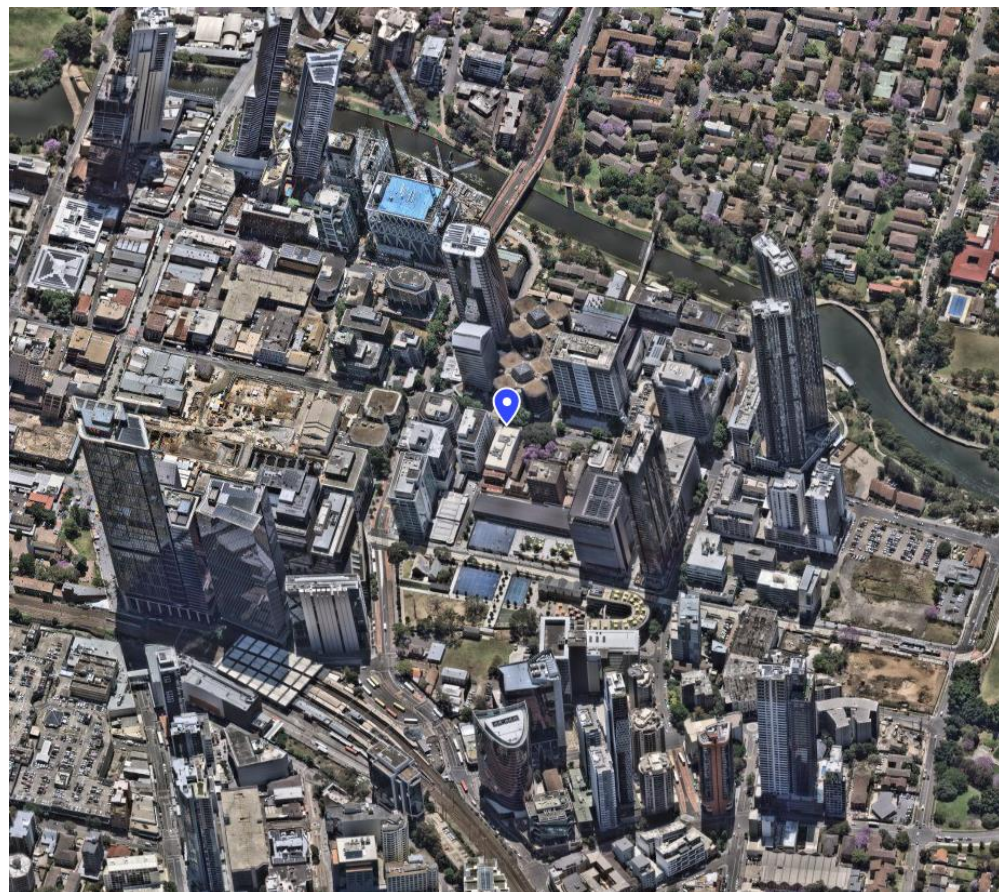
Figure 9.1.1 – Land Application Map – Parramatta City Centre

Figure 9.1.1 – Land Application Map – Parramatta City Centre from Parramatta DCP 2023 with the subject site indicated by green arrow

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A review of aerial imagery indicates that the site is centrally located within the broader high rise context of the Parramatta City Centre.



Aerial view of Parramatta showing the broader context of high rise development, with the subject site indicated by blue marker

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		In terms of cumulative impact, the proposal does not relate specifically to any previous or future works. The proposal is one element of the general uplift of development in the area associated with current State and local government planning initiatives. There are numerous high rise developments surrounding the subject site including State Significant Development projects within Parramatta currently listed on the State Significant Projects website. Considering the context, the proposed development is not considered to have a significant further impact on the setting or significance of heritage items in the vicinity. In the streetscapes in the immediate vicinity of the site, and the lower scale context primarily to the south, the heritage items, their setting and associated views will be defined by the relationships between elements at podium level given that close range views and experiences at pedestrian level are contained within the prevailing height of the street wall.

Conclusion

The proposed development subject of SSD 79439459 would alter the setting of heritage items within the site and in the surrounding context as tower forms would be visible above or behind such items from various viewpoints. The change is consistent with the changing nature of the Parramatta CBD as supported by strategic planning initiatives. Owing to urbanisation and the evolving needs of cities as populations grow and technology changes, the option of containing urban development to the scale of the traditional built environment would not satisfy current and future needs of contemporary society and in this regard, changes to the setting reflect a natural process of evolution and must be assessed against other changes affecting significance.

The proposed development would not physically alter the heritage items in the vicinity of the site, including Perth House and the Moreton Bay fig tree, or the Warders Cottages, with outcomes for the convict drain subject to test excavation. The original fabric and character is retained and the heritage buildings both on and around the site would remain visible within the surrounding streetscapes. Some alteration to the setting can be acceptable where new development provides a considered response to its heritage context. In this regard, the proposal adopts a range of design strategies including setbacks, façade design, materiality and ground floor retail activation to provide a compatible response with the heritage context. The site owners further intend to address the collective conservation and management of the subject site and adjoining sites through progression of a precinct Conservation Management Plan.

Beyond the scale of the proposed development, a compatible response can be achieved by juxtaposing unaltered and legible heritage items with clearly contemporary buildings that draw on the character and fine grain detailing of the heritage context to inform the design response. The design, including RTS amendment described in response to HNSW-6, has adopted such a contemporary aesthetic, including neutral facades to support interpretation objectives, and further works to substantially improve interfaces with adjacent heritage items in the ground plane through the establishment of compatibly scaled outdoor spaces that facilitate activation, in addition to physical and visual access to the heritage items.

The proposed building is consistent with strategic planning objectives for the Parramatta CBD. In this context, it is important to recognise that the protection of heritage significance does not preclude change and innovation, as demonstrated in guidelines for infill development prepared jointly by Heritage NSW and the Australian Institute of Architects which state that it *'is important to enable new ideas and responses to be developed...The existing historic context is not a constraint but an opportunity to add something new that results in the whole being greater than the sum of the parts...These guidelines...encourage new buildings that our generation can admire and enjoy – the heritage of the future.'*¹

In this regard, the proposal will contribute to the urban fabric of the Parramatta CBD, respect the historical context and culture and contribute to the evolution in growth and prosperity occurring across the city.

Yours sincerely,



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¹ NSW Heritage Office [Heritage NSW] and The Royal Australian Institute of Architects, *Design in Context*, 2006, p.03.