

Department of Planning, Housing
and Infrastructure
4 Parramatta Square, 12 Darcy Street
Parramatta NSW 2124

Your Ref SSD-79439459

Our Ref NCA/2/2025

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10 December 2025

ATTN: Lucinda Craig

COUNCIL SUBMISSION TO EXHIBITION OF ‘BUILD-TO-RENT’ DEVELOPMENT AT 1 BARRACK LANE AND 81-83 GEORGE STREET, PARRAMATTA

I refer to the above application and the request to provide advice on the proponent’s Environmental Impact Statement (‘EIS’).

Council has reviewed the EIS and supporting documentation and **objects** on the following grounds. Further details on the objections and other comments are provided at Appendix 1.

Should additional documentation/information be provided by the proponent that addresses these key matters to Council’s satisfaction, Council will consider formally withdrawing its objection.

- **Job Loss / Economic Impact** – Council resolved at its meeting on 9 December 2024 to oppose build to rent development in the E2 Commercial Centre zone as per extract follows:

“(f) That Council continue to oppose the application of Build to Rent provisions within the Housing SEPP to the Parramatta CBD’s E2 Commercial Core zone and call on the NSW State government to immediately exempt Parramatta from those provisions, recognising that they are inconsistent with decades of planning for Parramatta’s CBD and are prejudicial to creating a world-class railway terminus and employment centre in Parramatta.”

The objective of the E2 Commercial Core zone is to prioritise the role of the Parramatta CBD in employment generation and as a regional centre for business, retail, community and cultural activity. The inclusion of build to rent housing within the commercial core of the Parramatta CBD is at the expense of realising its regional economic role. Council’s current strategic framework allows for sufficient future housing delivery, including within the Parramatta CBD.

- **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

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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.

- **Setbacks / Site Isolation / Heritage** – The proposal does not include appropriate tower setbacks relative to the podium - resulting in inappropriate built form and unacceptable impacts on the adjoining heritage items - or relative to the boundaries, resulting in further isolation and reduced viability for the redevelopment of 85 George Street.
- **Occupant Amenity** – The proposed modular development approach, while a potentially worthy experiment in cost savings and construction efficiency, would set a significant precedent for ADG non-compliances (i.e. room width, studio size, etc). As such it is recommended that a full-size mock-up of a studio unit, with furniture, be prepared for inspection by the assessment team prior to determination of the application. Further, the novel construction methodology for a building of this size should be supported by structural engineering and BCA compliance advice from appropriate professionals prior to determination.
- **Social Impacts** – Council objects to the social impacts of the proposal due to the pressure of unanticipated residential growth on local infrastructure, the poor dwelling mix (insufficient proportion of permanent family sized units) and under-sized studio apartments.
- **Street Interface** – The recessed ground floor along the north-west corner of the site on George Street is not supported. The transition between the street level and flood planning level should occur internally, with the façade at the boundary, consistent with Council controls.

Conclusion

Council appreciates the opportunity to comment on the above application and look forward to continued collaboration. It is noted that this is a Council officer submission.

Should you wish to discuss the above matters, please contact Alex McDougall (Acting Manager, City Significant Development) on the details listed above.

Yours sincerely



Mark Leotta
Group Manager
Development and Traffic Services Unit

APPENDIX 1 – DETAILED OBJECTIONS/COMMENTS

Heritage

Built Form

To mitigate heritage impacts related to materials, setbacks, and the street wall, refer to Urban Design comments outlined below.

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.

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.

The Perth House CMP notes that the existing 8-storey office tower to the rear of Perth House forms an "imposing backdrop" to Perth House and Stables and notes that this level of development should not set a precedent for further development on the site or adjoining properties. The plan highlights the importance of maintaining a curtilage (buffer or setting) that identifies the relationship between Perth House and the Stables. It notes that the existing 8-storey office tower has already "dwarfed" these heritage buildings, and further development of similar scale should be avoided to protect the heritage values of the site.

The built form proposed will form a backdrop of Perth House from close views to the north-east of the item. It is not clear why a similar tower would not thus be considered acceptable directly to the rear of Perth House. As such, it is considered that the outdated CMP should be updated, to consider whether 85 George Street should be amalgamated with the site, or how a tower can be accommodated on the site, particularly given the significant increase in allowable heights in the area since 2004.

The 85 George Street lot narrows to the rear. As such it would be difficult to develop a tower while complying with existing side setback controls (i.e. 6m either side).

For this application, the applicant argues for a minimal eastern tower setback (~4.5-5.0m). This sets a precedent for a future developer of the Perth House site to argue they should be entitled to the same concessions to form a viable tower footprint. This could potentially result in an almost unbroken wall of development around the heritage item (see figure 1 below).

A CMP appropriately developed for the existing context may set out that development on adjoining sites (i.e. the subject site) need be respectful of side setbacks controls, given the site-specific constraints they impose on the heritage site and potential knock-on impact on the heritage item.



Figure 1. Potential footprint for tower to rear of Perth House seeking to take advantage of ‘viability’ justified reduced setbacks on the precedent of the subject proposal (Council drawings).

It is an established planning principle (see for example *Karavellas v Sutherland Shire Council* [2004] NSWLEC 251) that where an adjoining site is constrained, it may be appropriate to provide increased setbacks (relative to controls requirements) to ensure both sites are viable. Given the above, if the applicant still wished to breach the side setback controls, it would need to amalgamate with the Perth House site in order to ensure no development could occur on the Perth house site in the future.

Indeed, if the subject site were amalgamated with the Perth House site, and certainty provided that the area to the rear of Perth House would not be developed, it may be possible for the proposed tower to encroach even closer to Perth House and still have an acceptable impact on the item.

It should be noted that there is usually a natural incentive to amalgamate with heritage sites to excise their GFA potential. In this case, as the site is restricted by a solar height access plane, this incentive does not exist, or is minimised. However, this does not negate the need to either provide for the reasonable development potential of the adjoining site (outlined in a new CMP) or amalgamate with the site. Given the concurrent residential proposal at 89-91 George Street, it may be more appropriate to amalgamate 85 George Street with that site, as it can realise the additional FSR from 85 George Street (no solar height plane).

This revised CMP should also address the contextual placement of new buildings, ensuring the preservation of the site’s view and vista, as well as maintain open spaces and landscaping within its domain and setting (i.e. Perth House, the convict drain and Barracks wall, and the Warders Cottages).

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. The interpretation should be developed throughout the detailed design and construction phases in collaboration with the project architect and other specialists. The strategy should consider both the European and Aboriginal cultural heritage of the site, including the interpretation of archaeological resources and the convict site history. Additionally, heritage interpretation should enhance the understanding and connectivity of features such as Perth House, the convict drain and Barracks wall, and the Warders Cottages.

As recommended by Urbis further design development should prioritize enhancing the Warders Cottages' setting. This can be achieved by considering materials, lighting, and other improvements that encourage meaningful activation. The forecourt presents an excellent opportunity to serve as a focal point for heritage interpretation and potentially incorporate public art, further enriching the cottages' setting and promoting site activation. This integration should be part of a comprehensive placemaking and heritage interpretation strategy, adhering to conditions of consent.

Additionally, it is advisable for the project team to engage with the property owners and occupants of the Warders Cottages to improve the interface, including the potential removal of features like the metal palisade fence where feasible. Detailed design development should be conducted in close collaboration with the project heritage consultant to ensure all heritage considerations are meticulously addressed.

Strategic Planning

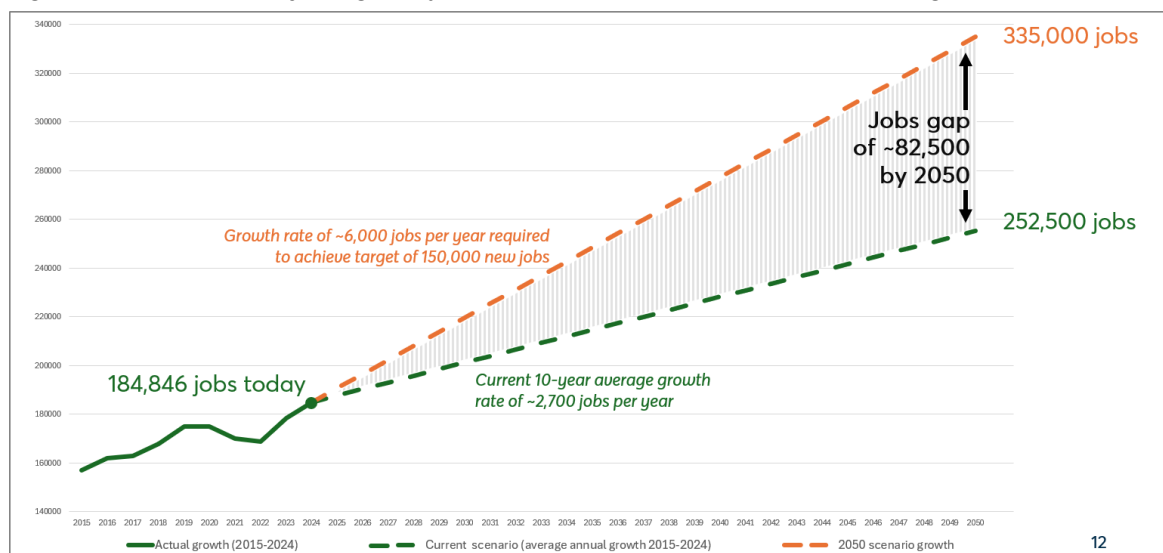
Jobs Growth Imperative in Parramatta

Parramatta plays a significant regional role in Greater Sydney, as the leading employment centre in Western Sydney and NSW's second major CBD.

Parramatta's population is expected to grow by 70% or approximately 140,000 people by 2041 (.id), and the broader Western Sydney region is projected to grow by 712,000 people in that time period. This scale of regional growth reinforces the importance of Parramatta's role in concentrating high-quality, accessible jobs to support Western Sydney.

As such, it is imperative that Parramatta's jobs growth is commensurate with its population growth to ensure that the City continues to provide at least 1 job for every 1.5 people living in the City, and that it addresses Greater Sydney's jobs imbalance between east and west.

Figure 1 indicates the jobs gap by 2050 should the Parramatta 2050 target not be pursued:



BTR in the E2 Commercial Core

The proposal seeks to develop 618 dwellings in a tower form, and 231 sqm retail GFA on the ground floor. The site is centrally located within Parramatta CBD’s largest contiguous E2 Commercial Core zone.

The proposal represents a significant departure from the previously approved concept for the site, which included a substantial commercial building within a precinct that was envisioned to be a premier office destination. George Street between Horwood Place and Charles Street has long been at the heart of Parramatta’s commercial core, with residential developments located adjacent to the core but not within it. Infrastructure investments, such as Metro West, PLR, and Civic Link, are expected to bolster the desirability of the commercial core, which stands to benefit from similar levels of connectivity to the Sydney CBD.

The Parramatta LEP 2023 is explicit in its objectives for the Parramatta CBD E2 Commercial Core, and the proposed scheme runs counter to the following objectives:

- To strengthen the role of the commercial centre as the centre of business, retail, community and cultural activity,
- To encourage investment in commercial development that generates employment opportunities and economic growth,
- To enable residential development only if it is consistent with the Council’s strategic planning for residential development in the area,
- To strengthen the role of Parramatta City Centre as a regional business, retail and cultural centre and as a primary retail centre in the Six Cities Region.

Therefore, the proposal to deliver BTR in the City’s E2 zone is not supported where the primary use of the proposed development is predominantly residential (as opposed to commercial).

It is recommended that the SSD is not supported on strategic grounds due to the following:

- Council has resolved to continue to oppose the application of Build to Rent provisions within the Housing SEPP to the Parramatta CBD’s E2 Commercial Core zone.
- The zone objectives for the E2 Commercial Core zone clearly prioritise the role of the CBD in employment generation and as a regional centre for business, retail, community, and cultural activity.
- Council’s strategic framework clearly identifies other zones for housing delivery, and Council is meeting housing capacity targets.

Impact on Parramatta CBD Employment Capacity

The number of FTE jobs expected to be generated by the proposal has not been stated however, an estimated 5 FTE retail jobs will be created based on the team's calculations per Table 1. The FTE employment figure generated by the completed development in-situ is expected to be provided in an Economic Impact Assessment.

Table 1 (below) provides a summary of employment and residential uses per the SSD EIS and the previously approved scheme (DA/937/2022), against which the change in use is assessed in our comments.

Please note estimated potential loss of >3,300 jobs in the new proposal, compared to the previous concept approval.

Table1.	Current Proposal	Previously approved	Variance (from previous)	Existing condition	Variance (from existing)
EMPLOYMENT USES					
Commercial GFA m ²	0	53,757	-53,757	N/A	N/A
Commercial jobs	0	3,360	-3,360	N/A	N/A
Retail GFA m ²	231	468	-237	N/A	N/A
Retail jobs	5	9	-4	N/A	N/A
Hotel GFA m ²	0	0	0	N/A	N/A
Hotel jobs FTE	0	0	0	N/A	N/A
Other non-resi GFA m ²	0	0	0	N/A	N/A
TOTAL JOBS FTE	5	3,369	-3,364	N/A	N/A
RESIDENTIAL USES					
BTS units	0	0	0	N/A	N/A
BTR units	618	0	618	N/A	N/A
Other units	0	0	0	N/A	N/A
TOTAL RESIDENTS	1,298	0	1,298	N/A	N/A

- GFA and dwelling figures derived from application documents. N/A = Not Applicable.
- Job calculations derived utilising floorspace to worker ratios per City of Sydney's Floorspace and Employment Survey of 1 worker per: 16sqm for office; 49.8sqm for retail; and 1,403.8sqm for hotel.
- Resident/population calculations using average ratio of 2.1 people/dwelling at Wentworth Point.
- N.B. The proposal delivers 383 dwellings, including 235 dual key apartments. The figure for BTR units in the above table includes the total number of individual units (i.e. not combined) at 618, per the EIS.

The proposed scheme represents a significant loss in jobs capacity both in terms of the previously approved concept and in terms of the capacity of the proposed GFA turned over to residential uses per this proposal.

Council is unable to support an application that substantially diminishes the jobs capacity of the Parramatta CBD E2 zone.

Notwithstanding our objection to the proposal, and acknowledging this proposed land use is currently permitted under the Housing SEPP, Council provides the following recommendations:

- That the proposal should maximise commercial floor space, with the predominant share of total floorspace dedicated to commercial uses permissible in the E2 zone.
- That in addition to a majority commercial scheme, there needs to be considerable community benefit (beyond the provision of housing where Council is already achieving its targets) to warrant any residential uses at this site.
- That the applicant clearly demonstrates how any residential and above ground car parking floor space proposed is convertible to future quality grade commercial uses appropriate for this location in the CBD.
- That the applicant provides a rigorous assessment of the proposal against the E2 zone objectives per the Parramatta Local Environment Plan.

Response to the EIS

EIS Commentary	Council Response
<p>Meeting the City's housing targets as justification for BTR in the Commercial Core</p> <p>The EIS offers commentary about this proposal's perceived alignment with the objectives of Council strategies as they relate to housing, including the <i>Parramatta Local Strategic Planning Statement (LSPS)</i> and the <i>Parramatta Housing Strategy 2020 (LHS)</i>, as justification for this development.</p> <p>Page 23: <i>"The proposed development will meet the aims and demands of the LSPS by providing 383 apartments ranging in size and layout to accommodate the future demographics for Parramatta."</i></p> <p>Page 23: <i>"The proposed development addresses the Parramatta Local Housing Strategy by:</i> <ul style="list-style-type: none"> • <i>will (sic) help to boost housing supply in the Parramatta LGA to help council meet these new housing targets."</i> </p> <p>Page 28: <i>"Retaining the site in its current state fails to respond to the strategic planning objectives outlined in the City of Parramatta's Local Housing Strategy (2020) and Local Strategic</i></p>	<p>The EIS ignores that the LSPS and LHS do not support or encourage residential development in Parramatta's E2 zone, and nor do the housing targets for Parramatta rely on residential development in the E2 zone.</p> <p>City of Parramatta already has 24,500 dwellings in the pipeline, totalling 126% of our current housing target of 19,500. As such, there is no justification nor urgency for residential development in the City's E2 zone. Separate to that, recent analysis undertaken by the City has identified significant un-used housing capacity for a further 23,008 dwellings created from rezonings that have been finalised since 2016-17 but have not been taken up. In total, that's a total housing pipeline for 48,408 dwelling demonstrating the insignificance of the need for this proposal.</p> <p>Further, when the applicant is drawing conclusions about the LHS and LSPS, it is important to note Council's endorsed objection to BTR in the E2 zone aligns with both the LSPS and LHS in their objectives which seek to safeguard the E2 zone for employment uses. Further neither strategy considers residential development in the E2 zone is required to meet the City's housing target.</p> <p>The LSPS and the LHS both identify areas in the City of Parramatta for housing outside the E2 zone.</p> <p>Council firmly disagrees with the proposition that BTR in the E2 zone in lieu of commercial and employment uses is justified to help meet the City's housing target, as the City is currently exceeding its target whilst prohibiting residential in the E2 zone via the LEP.</p> <p>The team also disagrees with the notion that retaining the site in its current state will fail to respond to the strategic planning objectives of the LSPS and the LHS.</p>

<p><i>Planning Statement – City Plan 2036. These documents emphasise the need to:</i></p> <ul style="list-style-type: none"> • <i>Support housing supply and diversity through mixed-use redevelopment, particularly in areas well-serviced by transport.</i> • <i>Align growth with infrastructure delivery, including the transformative Sydney Metro West, which is expected to significantly enhance connectivity and stimulate commercial and residential demand.”</i> 	
<p>Performance of the Parramatta office market</p> <p>The EIS makes commentary regarding the performance of the Parramatta office market as justification for amending the approved commercial concept to BTR.</p> <p>Page 29: <i>“With Parramatta’s office vacancy rate now at 20% - up from 19.4% six months prior and which includes the recent addition of 20,754 sqm of new supply of A Grade office space - the provision of additional commercial floor space would only contribute to this vacancy situation, which is expected to be sustained for a long while. This outcome is thought to be largely due to reduced floor space demands by larger tenants in Parramatta, due to the advent of more people working from home.”</i></p> <p><i>“Therefore, George Street’s existing built form and market positioning may not support the delivery of premium grade commercial space as sought by Council and any new premium floor space will only add to existing high vacancy rates and subdued demand for both</i></p>	<p>Council has consulted industry assessment of the Parramatta office market and does not accept the argument by the applicant that commercial office development in Parramatta CBD will not be viable.</p> <p>According to the Property Council Australia (PCA, Feb 2025), whilst the overall office vacancy rate in the Parramatta CBD is at 20 percent to Jan 2025, the vacancy rate for premium/A-grade commercial stock is considerably lower at 13.3%, with new supply additions in that period.</p> <p>High levels of vacancy are recorded in B, C, and D-grade properties. This is in line with national trends, which has seen a ‘flight to quality’ throughout major CBD office markets, indicating demand for new quality office stock.</p> <p>Council refers to the ‘Parramatta CBD Office Forecast Report’ (RWC Western Sydney, Feb 2025) whose assessment indicates viability for premium office stock in Parramatta: <i>“Parramatta’s office market continues to show resilience, recording positive net absorption for both the half year and annual period to January 2025.”</i> <i>“Premium grade assets have attracted sustained tenant interest, while recently refurbished B-grade stock has also found support among value-conscious occupiers.”</i></p> <p>It is not Council’s role to determine whether private developments are economically feasible at a particular point in time however, the applicant should note the continued strong performance of new premium grade office stock, and the cyclical nature of the commercial property sector that is expected to see conditions return to normal late this decade (PCA). A staged approach to commercial development could see a future commercial development scenario realised in time for the next office market upswing.</p>

<p><i>secondary and premium office space assets.”</i></p>	
<p>Suitability of George Street for premium commercial developments</p> <p>The applicant posits that <i>“George Street’s existing built form and market positioning may not support the delivery of premium grade commercial space as sought by Council and any new premium floor space will only add to existing high vacancy rates and subdued demand for both secondary and premium office space assets”</i> (page 29).</p> <p>The applicant also seeks to show this development’s alignment with the NSW Government’s Better Placed policy: <i>“The proposal has considered the objectives of Better Placed and a response to each objective is provided below:</i> 1. <i>Better Fit: The proposed designed responds to the future context of Parramatta by providing an appropriate scale of building to address the future context of Parramatta and providing much needed housing that is located close to public transport, a diverse range of jobs, services and cultural and education facilities”</i> (pages 23-24).</p>	<p>Council refutes the assertion that George Street may not support the delivery of premium grade commercial space.</p> <p>The site is centrally located within Parramatta CBD’s largest contiguous E2 Commercial Core zone.</p> <p>The recent refurbishment of the 22,000sqm A-Grade 150 George Street (to the east of this site), and its return to the market with tenant uptake indicate confidence in George Street’s viability as a premium commercial office district.</p> <p>Further, the assertion the site’s proximity to high-frequency public transport including the future Parramatta Metro West station makes it a suitable location for housing is equally applicable to other uses including employment uses.</p> <p>The applicant notes that the site’s proximity to public transport <i>“ensures excellent connectivity to employment hubs across Greater Sydney, supporting access to jobs and services”</i> (page 24), with the inference being that these jobs will be located outside Parramatta, which is an undesirable economic and social outcome for Parramatta.</p> <p>Council does not accept the argument that this development aligns with the Better Placed policy as justification for BTR in the E2 zone, nor that residential uses are most appropriate for this location.</p> <p>This development sets an unwelcome precedent for residential uses in the E2 Commercial Core.</p> <p>BTR and other residential uses in the E2 Commercial Core critically obstruct jobs growth in Parramatta, displace existing and future commercial and retail floorspace, and limit the City’s ability to continue growing jobs to service an increasing residential population.</p> <p>Further, if this precedent is accepted, the Parramatta CBD will risk losing much needed employment space, negating the assertion that developments such as this will continue to provide housing that is close to jobs.</p>
<p>Convertibility of the development to house commercial uses</p> <p>The EIS notes the site can respond to changing market</p>	<p>Notwithstanding our objection to the proposal, Council notes the inconsistency in the applicant’s assessment of the development’s potential to convert to commercial use.</p>

<p>conditions and change use to commercial uses via redevelopment (page 29).</p> <p>The Design Statement includes information on floor heights:</p> <p>Page 32: <i>“the podium includes two additional levels with 3.8 metre floor-to-floor heights. While the primary function of these levels is car parking, the generous floor-to-floor heights allow for future adaptation to alternative uses such as commercial or retail”</i></p> <p>Page 96: <i>“The floor to floor height is 3.25m typically on residential levels. Living rooms, dining rooms and bedrooms achieve 2.7m ceiling height to maximize amenity.”</i></p>	<p>The applicant considers the 3.8m floor-to-floor heights in the podium level as suitable for future adaptation to commercial uses.</p> <p>In the approved concept for an A-grade commercial building (DA/937/2022) the heights of the commercial floors were 3.75m, which Council accepts as a minimum standard for A-Grade commercial development.</p> <p>The residential levels of the tower in this proposal are only 3.25m floor-to-floor, lower than the approved commercial concept. This would compromise the viability of premium/A-Grade quality commercial floorspace being adapted, and renders this outcome as unlikely.</p> <p>Council does not accept that the applicant has demonstrated the convertibility of the full development to future premium commercial uses that are appropriate for this location. Council recommends the applicant adequately demonstrates how this development can yield premium and viable commercial uses across its height in future adaptation.</p>
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Retail Demand Generated and Not Met

The SSD proposes a total of 231 sqm of retail space. Council considers the amount of retail floorspace proposed for a residential development of this scale to be insufficient. The retail tenancies will likely fail to satisfy demand generated by up to 618 dwellings.

Based on preliminary calculations using Council’s Local Housing Strategy (LHS), the development could see more than 1,000 residents on site. Although the Parramatta CBD contains a significant amount of retail space, more than two thirds of Parramatta retail space is in the Westfield complex, which is located approximately 800m away from the subject site. A 2019 study of retail demand in Parramatta found that retail floorspace in the Parramatta LGA is below the per-capita Greater Sydney benchmark, and that population and employment growth will see demand for an additional 151,600 sqm of retail space in the Parramatta CBD by 2036.

It is recommended that an Economic Impact Statement be completed which must:

- Provide a clear breakdown of existing GFA proposed to be replaced, by land use type.
- Provide a clear breakdown of GFA by land use type in the original approved proposals (concept), and estimate the jobs created in each land use component.
- Assess and justify any difference in jobs numbers between the previously approved and current proposal, including long-term economic impacts to the City that might result.
- Provide a clear analysis of demand for retail and other population-serving uses generated by the proposal. This should include greater emphasis on the role of retail in developing a precinct that serves and reflects the scale of the proposal and population in-situ, regardless of eventual use. The proposal should be justified in light of this analysis, ensuring the proposal responds to retail demand.

Social Impacts

Demand for Community Infrastructure

- The proposal represents unanticipated population growth, as it will introduce a significant residential population within a commercial zone.
- Whilst the SIA refers to communal spaces for residents as addressing some demand, there is no public benefit proposed.
- The lack of public benefit within this proposal and similar proposals nearby will have a cumulative impact on demand for community infrastructure and open space.

Dwelling Mix

- The proposed dwelling mix is summarised below:

Apartment mix where each dual key apartment is leased as one sole occupancy apartment (0% conversion):	Apartment mix where each dual key apartment is leased as two sole occupancy apartments (100% conversion):
383 apartments: <ul style="list-style-type: none"> • Studio: 74 (19.3%) • One bedroom: 29 (7.6%) • Two bedrooms: 214 (55.9%) • Three bedrooms: 66 (17.2%) 	618 apartments: <ul style="list-style-type: none"> • Studio: 309 (50.0%) • One Bedroom: 208 (33.7%) • Two Bedroom: 91 (14.7%) • Three Bedroom: 10 (1.6%)

- According to the ADG, dual key apartments are regarded as two sole occupancy units for the purposes of calculating the mix of apartments. Therefore, the majority of units (83.7%) are studio and 1 bedroom.
- This is not consistent with the ADG's *Objective 4K-1 A range of apartment types and sizes is provided to cater for different household types now and into the future.*
 - There is a need to provide a higher proportion of larger units to meet the needs of larger households.
 - In Parramatta CBD, the average household size is 2.35 and the dominant household type is couples with children, representing 28.2% of households.
- Dual key units are supported when provided in addition to the adequate provision of 3 bedroom units, as they can enable additional flexibility to meet the specific needs of larger household types, including intergenerational households and group households.
 - In this case, dual key units are not provided in addition, but instead as an alternative to 3 bedroom units, which is not supported.
- Dual key units are not a substitute replacement for 3 bedroom units, as they do not achieve the same functionality and amenity for families with children. For example, shared spaces within the dual key unit are not consolidated, impacting useability and hindering passive supervision of children.
- Given it is more profitable for the BTR operator to lease the units separately as a studio/1 bedroom and 2 bedroom unit, there is a risk that that these will not be offered to the rental market as 3 bedroom units.
 - According to realestate.com, between December 2024 and November 2025, the median rental prices for units in Parramatta suburb were:¹
 - \$580 per week for 1 bedroom units
 - \$650 per week for 2 bedroom units
 - \$800 per week for 3 bedroom units

¹ <https://www.realestate.com.au/nsw/parramatta-2150/> (Accessed 3 December 2025)

- Only 10 units are guaranteed to function as 3-bedroom units in practice. This will impact the ability of residents to relocate to other dwellings in the building that will better accommodate their housing requirements if their requirements change.

Subletting and Affordability

- The SIA states that:
 - “The dual key model generates potential economic benefits. By enabling residents to lease part of their apartment, these typologies support income generation and improve housing affordability, particularly for single-income households, students, and lower-income households.”
- According to the Housing SEPP, build to rent units should provide the ability for tenants to relocate within the building to suit changing household requirements. The inclusion of dual key units and promoting their subletting undermines this.
- Further, BTR developments often provide a premium product, so are unlikely to provide housing options for lower income households.
- Positioning the subletting of dual key units as a social and economic benefit, to generate income and improve housing affordability, raises concerns.

Studio Units

- The proposed minimum internal area for the studio units (27m²) is below the minimum size set out in the ADG (35m²).
- The ADG establishes that all apartments are required to have balconies, with studio apartment balconies required to have a minimum area of 4m². In this proposal, the studio units do not have a balcony.
- The EIS states that the high provision of communal open space “*balances the reduced private open space provision for some apartments*”. However, the lack of private open space combined with inadequate internal space raises concerns about the residential amenity for the studio units.

Urban Design

Construction Approach

- Concern is raised regarding the proposed Volumetric Modular Construction (‘VMC’) technique for the following reasons:
 - a. The construction technique is not common in Australia nor globally for the proposed scale of development. It is noted a firm called Space Labs is associated with the project and would be responsible for the development’s construction. The small mockup that is shown on the firm’s website raises concerns over the quality of the exterior finish and the ability to execute a coordinated façade structure.
 - b. There is some commentary that the construction technique offers future flexibility of use and the potential for converting to a commercial tower. There does not seem to be a plausible way of retrofitting the building both due to the integration of the structure within each Volumetric Module but also because a residential floor to ceiling height is being used.
 - c. The development is currently in an E2 zone which would perpetually enforce the buildings’ use as BTR but it is possible that this control would change either by state government or a Planning Proposal in the future. The possibility of the building changing to build to sell at some stage is a concern. The construction approach is specialized and future upkeep (particularly to the exterior) has the potential to become challenging or cost prohibitive as a strata titled building.
 - d. The modules appear to be limited to a 3.5m width (creating an internal dimension of 3.2m). It is questioned what has determined the 3.5m dimension and whether it

is a regulatory issue related to logistics. The size of the modules used is problematic, causing amenity issues to units throughout the tower.

ADG

- *Floor to ceiling* - The sections provided in the drawing package have drawn the residential levels with a floor to floor of 3.25m and a floor to ceiling height of 2.9m which is questioned. It would be useful to know if the sections are just indicative or accurately showing the structure between stacked volumetric modules. The assumption is that the drawings are not accurate and there is a possibility that the ADG minimum of 2.7m floor to ceiling height is not achieved.
- *Minimum dimensions* - As stated under the heading 'construction approach', there are amenity concerns resulting from the 3.5m module width that results in a 3.2m wide internal space. To meet ADG design criteria a minimum living space width of 3.6m is needed for the Studio/1 Bedroom Units and 4m for 2+ Bedroom Units. All units are failing to meet the ADG criteria. Whilst it's acknowledged some flexibility should be given to BTR developments, the arrangements of the living area with the integration of the kitchen within a 3.2m wide space is not supported nor practical for residents. The token wider space adjacent the window is not considered to be sufficient to constitute a compliant living space.
- *Usability of unit areas* - The modular construction technique skews the proposed floor area of each unit. Two and particularly three-bedroom units are quite generous in area when compared to their associated area recommendations within the ADG. In practice much of the floor area of the units is dedicated to bedrooms and circulation with diminished living areas.
- *Number of units per circulation core* - The number of units per floor will vary from between 10 to 20 depending on the number of dual key apartments in use. The quality of the communal circulation is poor, it's convoluted with snorkel or isolated openings and limited space directly in front of lifts. The units per core should be reduced and more generous space provided by the lifts.

Presentation of Development

- The rendered perspectives provided in the drawing package do not appear to align with the plans or at least skewed in a manner that is misleading. The step in the tower floorplate appears much more significant than the plans suggest.

Alignment to the DCP

- It is acknowledged that the City of Parramatta's City Centre DCP (part 9) does not carry legislative weight in the determination of this proposal. In a number of instances, the quality of the urban design outcome will be reliant on the proposal's consistency with the DCP to ensure the development does not present as an outlier in the city.
- The DCP has maximum floorplate lengths and areas for towers that relate to intended use. This is in part due to the different levels of articulation expected for a residential tower against a commercial one. Whilst the tower is in an E2 Zone, its use as a BTR limits it to a max length of 45m and a floorplate area of 1,1000m². The proposed tower design does not align to the DCP controls.
- The stepped tower footprint is not supported.
- Part 9 of the Parramatta DCP 2023 should be consulted on detailed design of street walls. Under crofts and overhangs are not supported. The recessing of the ground level and the stepped level changes along the ground floor interface is not supported. Any changes in level that may be required because of flooding issues should occur within transitional space within internalized areas of the building. The ground floor appears to be higher than the Flood Planning Level, which does not assist with street activation interface. After

further consideration of flood comments within this letter, it is recommended that the ground floor be set at the Flood Planning Level and no higher.

Podium Parking

- Council would be supportive of the principle of above ground parking if the archaeological constraints of the site are such that any relic or Aboriginal object must be retained in situ. If not, Council’s preference is that underground parking be provided. As such it is recommended that a condition be placed on any consent to require a modification be submitted to implement below ground parking if no relics or Aboriginal objects are to be retained on site.
- If above ground parking is required, the podium parking has not been appropriately sleeved. The vertical louvered fins and supplementary vegetation is inconsistent with the approach to street walls throughout the City Centre.
- The parking level elevations to both George Street and Perth House should be sleeved with usable internal spaces, either residential or communal space.
- The elevation to Barrack Lane could be sleeved with a simple architectural façade treatment but it should have some relationship with the scale of articulation in the surrounding area and ground level of the development itself.
- The floor to ceiling height must also be such that the above ground car parking can be adapted to future alternative uses.

Setbacks

- While it is noted that the concept approval will need to be surrendered, as outlined below, it outlined that the envelopes approved in that application were only acceptable on the basis of an assumed commercial use. Condition 2 noted that, “*build-to-rent residential accommodation, may require additional setbacks*”. Even without this qualification, the proposal would not comply with several of the envelopes approved by the concept:

Location	Required (by concept)	Proposed	Non-Compliance (noting approved envelopes related to commercial use)
North-east (heritage tree)	22m	17.8m-25.2m	Up to 19%
East (north part of site)	6m	4.5m-5.0m	Up to 25%
South (west part of site)	5m	4.6m-4.75m	Up to 8%

The setbacks to the heritage tree were proposed on heritage and tree protection grounds which should continue to apply. Further they allowed for a setback relative to the podium.

Council’s vision for the Parramatta CBD is buildings with podiums which define and enclose the streets at a human scale, with clearly setback towers above. This approach is also important given the presence of two heritage items in close proximity, which would also benefit from being read against the backdrop of appropriately scaled podiums. However, the proposal in the two corners adjacent heritage (i.e. the north-east and south-west corners) do not include tower setbacks relative to the podium, but instead read as ‘tower to the ground’ typology. This is not considered to be appropriate and should be addressed.

- As per Section 9.3.3.2 of the Parramatta DCP 2023 for towers of this scale, the minimum residential separation to existing or potential future development on adjacent sites is 18m for residential towers in the MU1 Zone. Although the proposed development is in the E2 zone, 18m is still considered a minimum.
- Separation distances must be apportioned equally between adjacent sites to determine side and rear boundary setbacks.

Street Wall and Relationship to Heritage

- The street wall as formed by the podium is required to be built to the street alignment, at all levels.
- There is inadequate engagement with George Street as an active ground floor.
- The fragmented and recessed ground floor footprint heightens disconnection and creates ambiguous spaces.
- A sympathetic scalar relationship to Perth House is not possible without the podium playing a stronger mitigating role.
- The podium is required to provide visual cut off for the towers and create the granular relationship with the Warders Cottage and Perth House.

Wind Impact

- The effects of wind on pedestrian comfort are acute when towers come to ground without adequate mitigation. This is particularly concerning for George St and the forecourt behind Perth House. A Wind Impact Assessment is required as to determine wind amenity to the public domain, it will determine whether the proposed interfaces with the public domain will result in an acceptable wind environment.

Planning

Concept Plan

There is an existing concept plan in place for the site, Council Ref: DA/937/2022. It notes, at Condition 2, that the approved concept envelope relates to commercial uses only and not to build-to-rent residential accommodation. As per section 4.24 of the Act, the determination of any further development application in respect of the site cannot be inconsistent with the consent for the concept proposals for the development of the site. Given the proposal is no longer for a commercial office and is instead for build-to-rent residential accommodation, the proposal is inconsistent with the concept. As such the concept approval will need to be either, a) surrendered before the determination of the subject application, or b) a condition imposed on the consent requiring surrender of the concept approval prior to any works.

Isolation

There is an existing extant approval at 89-91 George Street, also owned by the applicant, for a commercial office tower (Council Ref: DA/662/2022). However, it is understood that the applicant does not wish to take up that consent and is currently in the process of a drafting an EIS for an alternative predominantly residential use of 89-91 George Street.

Notwithstanding, given the existing approval at 89-91 George Street, the proposal would serve to potentially isolate the intervening property at 85 George Street. As such the proposal must demonstrate why the proposal does not isolate the site, and demonstrate how a *viable* complying development can exist on that lot. Given the heritage fabric at 85 George Street, there is also crossover on this issue with the CMP discussed above.

It is noted that the proposed setback/separation non-compliances at the site are as a result of attempting to fit the full permissible FSR onto the site, under the solar access height plane. Were 85 George amalgamated with the site, the tower could be positioned so as to ensure appropriate setbacks from existing and future development. However, as outlined above, there is little incentive to amalgamate as the additional floor space available from such an amalgamation can not simply be added to the tower height.

Further, the proposed minimal side setbacks set a precedent for reduced setbacks at 85 George Street, which will compound the impact on Perth House when its site is redeveloped.

Catchment Engineering

Stormwater

The Integrated Water Management Plan cannot be finalised until the following is resolved.

The proposal advises that OSD is not required and would make flooding worse so is not included in the stormwater design.

RFI Requirements:

- a) Submit to satisfy Council a detailed mathematical demonstration that OSD would make flooding worse in the locality (or prepare a full OSD stormwater design)
- b) Submit to satisfy Council a detailed mathematical demonstration that OSD would not benefit an overland public drainage network.

Note: It is not sufficient to state that because a similar site nearby was not required to provide OSD that a similar consideration should apply here.

Flooding

The applicant does not appear to have requested a Council issued Flood Information Enquiry showing official flooding extent, hazard and levels, based on the 2024 adopted flood levels. The Applicant has done flood modelling which they advise is based on Council's current flood model (2024).

According to Council's adopted flood map from the GIS:

- In the 1% AEP flood there is negligible flow in Barrack Lane but flow of 0.15 to 0.30 m depth in George St adjacent to the site. This is classified as H1 low hazard.
- In the PMF there is much deeper and faster flooding in both George Street and Barrack Lane adjacent to the site. In George St, PMF flood hazard is predicted to be H6 – extreme in which nearly all buildings will not survive.

Note a Flood Enquiry Information issued in 16 December 2021 on the 2005 Flood Map predicted a PMF level of RL 11m AHD. The Applicant predicts a PMF level of 11.3m AHD. The Applicant predicts that PMF depths in the proximity of the proposed building footprints range from approximately 3.00 m (along Barrack Lane) to 3.70 m (in the northern side of the site along George Street).

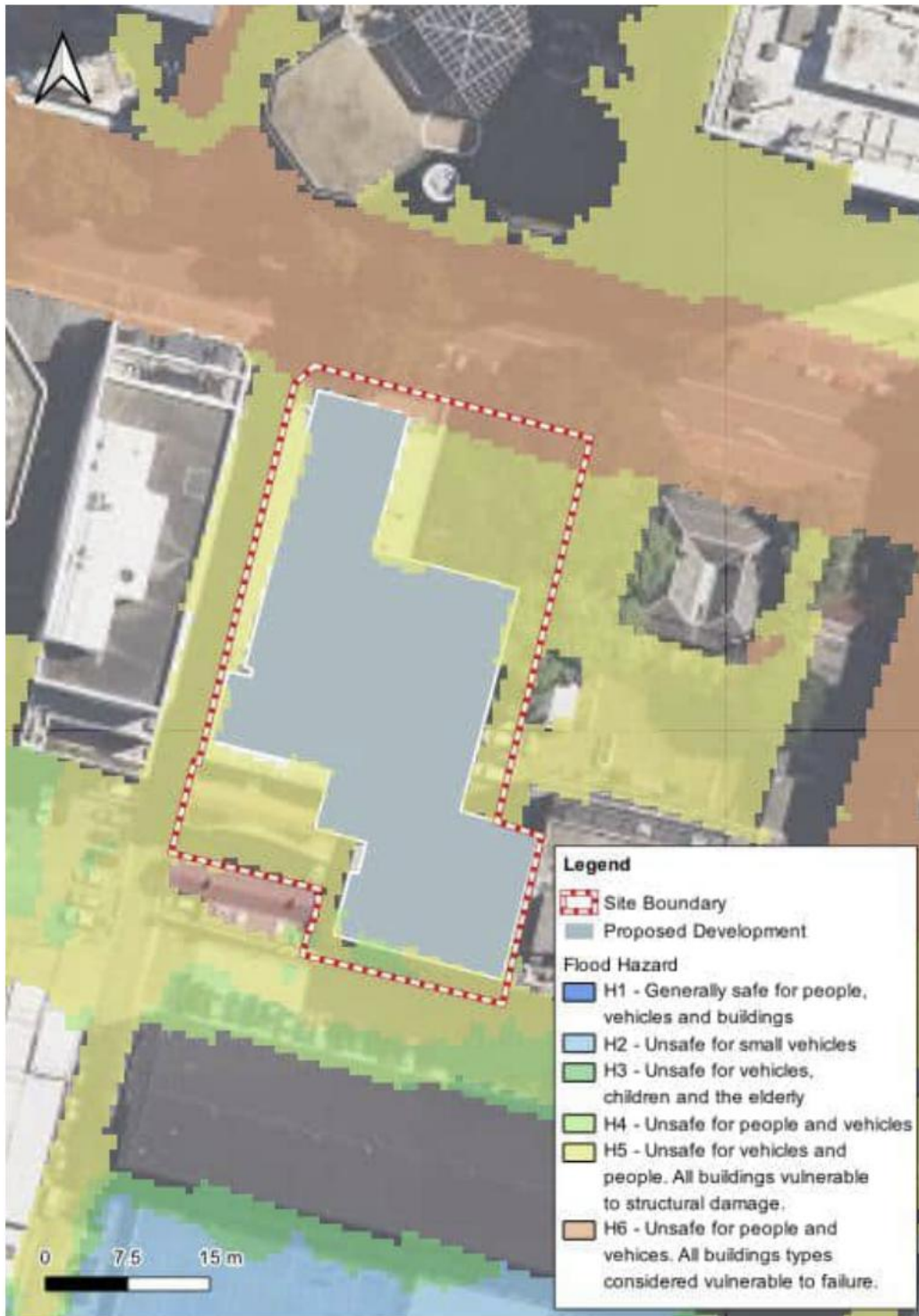


Figure 4-1 Flood Hazard for Post-Development During PMF (left figure

Above is the Applicant's hazard map prediction for post development PMF. This is generally consistent with Council's GIS of its adopted flood model.



Council Model GIS PMF

Between the 1% AEP and the PMF, flood hazard and risk surrounding the development will increase to extreme levels (H6) at which few buildings would survive.

Design aspects to be conditioned:

- a) Shelter in Place is an essential element of the development, generally as proposed.
- b) Building at ground level and up to RL 11.3m AHD at least must be able to withstand the most extreme flood hazard conditions in which most building forms would be destroyed. This will affect architectural and urban design elements.

Flood Planning Level

As noted above there appears to be no official Flood Information Enquiry issued. The Applicant advises:

It should be noted that the flood level for the 1% AEP event reaches up to 7.70 m AHD in George Street, while Barrack Lane only experiences shallow sheet flow, which can be conveyed through the proposed culvert. As a result, the site is not subject to flooding from Barrack Lane. For George Street, the Flood Planning Level (FPL) should be 8.20 m AHD. Given that the finished floor level across the entire site is above 8.6 m AHD,

the proposed FPLs for the site are considered compliant with the City of Parramatta's DCP.

The Applicant's flood study, which is apparently based on Council's flood study, appears to be generally reasonable except that it does not allow for climate change using the current adopted National and NSW State guidance as set out in Australian Rainfall and Runoff 2019 Chapter 6 updated August 2024.

RFI Requirements:

- a) Update the post development flood study for the 1% AEP and PMF water levels flood extents and hazard conditions using the currently adopted National and NSW State guidance as set out in Australian Rainfall and Runoff 2019 Chapter 6 updated August 2024 and using SSP3- 7.0 and 2150
- b) Review Flood Planning Levels for 1% AEP including climate change plus 500mm freeboard and recommend corresponding floor levels for all habitable floors, spaces.
- c) If this is acceptable to Council, adjust internal and external architectural plans accordingly.

Traffic

Parking

- In accordance with clause 74(2)(d)(iii), if a relevant planning instrument specifies a lower parking rate than those within the SEPP for BTR developments, the development is to comply with the lower rate. As the Parramatta LEP specifies a maximum only rate, the rates within the LEP are applicable to this development proposal. Accordingly, the development can provide the following maximum number of parking spaces:

Parramatta City Centre (not Area A)				
	Rate	Qty	Maximum Parking	Provided Parking
Studio	0.1	74	7.4	
1 Bedroom	0.3	29	8.7	
2 Bedroom	0.7	214	149.8	
3 Bedroom	1	66	66	
		Total	231.9	71

Given the above, the proposed development complies with the LEP parking rates for the residential uses.

- It is noted that no retail parking spaces have been provided which complies with LEP requirements.
- The Traffic Report states that 424 bicycle parking spaces will be provided which is consistent with the Parramatta DCP requirements. Accordingly, a condition is to be included to ensure this provision is provided.

Vehicular Access and Driveways

- Confirmation is required whether the passenger vehicle access and the service vehicle access will be level with no obstruction separating the two at least until first column.
- The swept paths for the loading dock relies on using the parking bay located partially on private land opposite the site. While the swept path is within the road reserve, should there

be a vehicle parked in the bay, access out of the loading dock will be obstructed. Accordingly, the access is to be revised to ensure there is no obstructions for trucks to enter and leave the site.

- The Trip Generation rate of 12 vehicles in the peak hour appears an underestimate and this will have significant impact on the queuing calculations for the car lift. It is noted that the TfNSW GTIA has a trip generation rate of 0.19 vehicles per dwelling which will result in much higher peak hour trip generation. While it is noted that the site has constrained parking, it appears that this has been deducted twice in the calculations. In the first instance, the TIA calculates the trip generation of 0.15 in the AM peak hour based solely upon the number of parking spaces. It then reduces the generation figure a second time on the basis of there being constrained parking on the site.

The Trip Generation rates for this site should be reconsidered noting that the site has the potential for 618 individual apartments in the scenario that each dual key is leased to two sole occupancy apartments. Even though the site has constrained parking, the high amount of dwellings may mean that those that have cars may be more likely to use them as opposed to alternative modes of transport. Following this, the queue assessment should be redone to ensure that there is no adverse impact that results from vehicles queued for the car lifts. Note that there must be no queues that extend onto Barrack Lane.

- Confirmation is required as to whether the car parking spaces will be allocated. If not allocated, this may result in periods where there will be significantly more tenants travelling to level 2 which has a greater service rate and therefore, this will impact the queueing analysis.

Car Park Design

- There are two accessible parking spaces located at the end of a parking aisle at the north most point on both car parking levels. There is insufficient space for vehicle to leave these spaces without a long reversing movement which would compromise the safety of the car park. Accordingly, these spaces are to be removed or relocated.
- The location of the car waiting area on the parking levels will likely obstruct the swept paths of vehicles exiting the lift. Accordingly, a swept path assessment should be undertaken and the car waiting areas to be revised accordingly.
- Swept path plans should be provided for access to the car lifts from the parking levels, particularly for the parking spaces located directly opposite the car lifts.

Loading Dock

- The capacity of the Loading dock is considered appropriate for the proposed use. A condition should be included for a Loading Dock Management Plan which should implement a booking management system, detail the management duties and responsibilities, and address issues such as what measures will take place in instances where the turn table is not operating.

Construction Traffic Management Plan ('CTMP')

- A condition is to be included for the CTMP to be developed in consultation and agreement with Council.
- It is noted that the applicant is requesting extended construction hours from between 7am to 12am on weekdays. In this regard, it should be noted that while the site itself is located

within an area that is predominantly commercial, construction vehicles will need to pass through residential areas to access the site which will have significant amenity impacts.

- It is noted that the construction methodology will require access to the site by overmass and oversize vehicles. Access by these vehicles is to be via an approval of an NHVR permit. In this regard, it should be noted that the applicant may be required to perform a structural assessment of any bridges or culverts that are owned by City of Parramatta, to ensure that the overmass vehicles can safely travel over the structures. This assessment would be required as part of an NHVR application and outside of the SSSA process. Note that any routes over PLR tracks will require separate approval from TfNSW and Great River City Light Rail.
- The construction methodology will need to be mindful of a separate Council project to upgrade Barrack Lane to a shared zone which will involve the construction of feature pavement throughout. The CTMP will need to ensure that communication is maintained throughout the construction works with Council's Project Manager to ensure appropriate co-ordination and limit conflicts. Note that construction vehicle access should not rely on Barrack Lane and should be limited to George Street only.

Universal Access

The proposed adaptable units (level 4-37) do not comply with the adaptable requirements of AS4299. The proposed adaptable units require a significant amount of work to adapt, including the following:

- Deletion of 5 storage areas
- Removal of 3 doors
- Relocation of 3 doors
- Deletion of kitchenette
- Relocation of the laundry
- Deletion of the study desk in bed 1
- Zero access to far side of relocated bed
- Deletion of the 1 wardrobe
- Relocation of the accessible pan
- Relocation of the shower
- Relocation of the basin
- Building of the new accessible bathroom including waterproofing, etc

These requirements put the proposal in direct conflict with AS4299 Design Principles below:

- *AS4299 Principles (b). Adaptable housing should be possible at relatively little extra initial cost. Later modification to adaptable housing will prove relatively easy to do at minimum inconvenience and minimum cost, and will more than offset the extra initial cost, thus encouraging the occupant to stay, rather than face the disruption and cost of shifting house. It will promote the economic and efficient use of building materials.*
- *AS4299 Principles. "Later modification to adaptable housing will prove relatively easy to do at minimum inconvenience and minimum cost."*
- *AS4299 SANITARY FACILITIES 4.4.1 The WC pan should either be located in the after-adaptation location initially or be fitted with a P trap. In addition, items like toilet paper dispensers and WC flushing controls shall comply with AS 1428.1. Because of the difficulty in moving some of these items after they have been initially installed, it is desirable that they should comply with AS 1428.1 from the outset*

Summary

1. Adaptable units associated with “affordable” and “built to rent” developments mean that the occupant would have little control over the adaptation of their dwellings as required. This isn’t a recommended or functional outcome as the occupant will never have control, and disputes of whom is financially responsible for any adaptation that may be required /occur.
2. It’s recommended that all adaptable units are provided with the post adaption spatial requirements from the outset following AS4299 to ensure only minor upgrades or changes are required for the dwelling to be considered “accessible”.
3. The “affordable” and “built to rent” provisions of a project are to be built in the post adaption spatial arrangements; full accessible unit compliance is required to follow BCA Table D4D2b.

Public Domain

Barrack Lane

Council has a Barrack Lane upgrade program which will be constructed in the near future. The applicant is requested to notify Council when they begin construction and find out when the Council works are going ahead. If both works happen concurrently, the applicant is expected to liaise with Council’s Capital Works team while carrying out their works.

Barrack Lane Interface and Design

Barrack lane has a proposed Council Capitol Works Program for its redesign and upgrade. Please refer to Council’s reference design forwarded to the applicants in the past (available again on request). The applicant is requested to coordinate with the team for the successful outcome of the project. Some points to consider will be –

- a) Interface
- b) Timing of construction
- c) Proposed levels of the Barrack Lane design
- d) Applicants may have to liaise with Council’s Capital Projects Team to coordinate delivery of the Barrack Lane interface.

Levels of Perth House

It would be good to see levels around Perth House to see how this development ties in with that on the ground plane. Wherever possible, we prefer that the transition is seamless in terms of levels, even if the materials are different.

Footpath

The public footpath along George Street needs to be in accordance with the Public Domain Guidelines 2017.

Fig Tree & Surrounds

- Note: The building envelope must stay clear of any space over the tree and must follow the designated setback from the tree while respecting its tree protection zone.
- Ensure adequate deep soil is provided around the existing Fig Tree as per DCP controls:
 - (9.6.3.C.20) *Landscape features that contribute to the heritage values and setting of a heritage item and conservation area must be retained and enhanced. In the*

case where existing trees contribute to the heritage values and setting of a heritage item and conservation area, a deep soil area beyond the perimeter of the tree canopy must be retained to the satisfaction of Council, and a basement must not be built below this area; and

- (9.36.3.C21) In the case of an historic house, a landscape area, preferably deep soil, large enough for trees with spreading canopies taller than the roof of the house, must be provided behind and at the side of the building in order to convey the original detached nature of the dwelling and a garden setting. The landscaping in front of the house, including a front fence if appropriate, must be designed to enhance the heritage values of the house.

Street Trees

- Street trees required along this street are *Platanus orientalis* 'Digitata'.
- Applicants are advised to retain and protect the existing street trees and explore possibilities for planting new ones, which may or may not be possible considering the existing heritage listed Fig and the existing plane trees.

Proposed Vehicular Access to the Building

The vehicular access for the building, current and proposed, is through Barrack Lane. The following points need to be considered while designing –

- a) Accommodation of the driveway into the building, considering the width of the site is short with many constraints.
- b) Swept paths will be very tight.
- c) Convict Drain layout and its invert levels
- d) Current condition of the convict drain
- e) How the construction will be carried out and the building laid within the context of the convict drain
- f) Council-led design & construction of Barrack Lane

Driveways

The maximum preferred width of driveway is 6m.

Trees & Landscaping

Arboricultural Reporting

It is recommended that the applicant engage the services of an AQF Level 5 arborist to demonstrate an appropriate setback to the existing heritage *Ficus macrophylla* (Moreton Bay Fig) within the front setback of the site and the existing *Platanus x hybrida* (London Plane Tree) located within the road reserve in accordance with AS4970 – 2025 Protection of trees on development sites.

It is recommended that all proposed services be located outside the recommended tree protection area of the *Ficus macrophylla*. Services may be permitted within the tree protection area of the *Platanus x hybrida* where it is suitably justified by the consulting arborist.

The requirements for arboricultural reporting are listed below.

An Arboricultural Impact Assessment (AIA) Report and Tree Protection Plan (TPP) is required to be prepared by a qualified AQF Level 5 Consulting Arborist that will identify all trees located within the subject site, all trees affected on the adjoining properties. The report must evaluate all trees proposed to be retained and removed throughout the development process. The arborist report must provide details of:

- (a) A plan at 1:100 or 1:200 scale showing the location of all trees located within the subject site and all affected trees located on the adjoining properties;
- (b) The plan must show the existing ground levels at the base of each tree, the actual canopy spread to scale, the location of and DBH (diameter at breast height) of the trunk of the tree and a tree number;
- (c) The plan must show tree retention values, tree protection zones and recommended developable area given constraints imposed by trees;
- (d) A tree assessment schedule showing all the trees information including both the botanical and common names, age, dimensions inclusive of height, canopy spread (N, S, E, W), DBH (trunk Diameter at Breast Height), TPZ (Tree Protection Zone), SRZ (Structural Root Zone) the health, structure condition and provide recommendations in relation to retention values;
- (e) A tree impact schedule addressing the likely percentage (%) impacts of the proposed development will have on the trees to be retained and provide recommendations of any construction mitigation measures that will minimise the impact;
- (f) A Tree Protection Management Plan showing the trees to be retained and protected with details on any encroachment, suggested ways to minimise the impact, and locating the specific tree protection measures required for each tree, and
- (g) Where retained trees have a development setback and tree protection zone established, a recommended tree protection specification and diagram should be provided in accordance with AS 4970—2025.
- (h) Where services are required to be installed within the TPZ of trees to be retained, non-destructive construction methodology to be discussed to minimise impact to the tree roots. (All roots 30mm and greater to be retained.)
- (i) Detail the methodology that has been used to evaluate the health and condition of the trees; determine retention values and determine tree protection zones.

All site plans are to be amended to indicate the tree protection zone requirements as set forth in the arborist's report along with any other note requirements that the arborist deems necessary to ensure the long-term health and retention of the trees.

Landscape Plan

- Planting is not supported within the tree protection area of the *Ficus macrophylla* in order to avoid root injury and soil disturbance.
- All proposed on-slab planters shall be sufficiently sized to ensure that proposed planting will thrive in the location. Planter box sizing shall be in accordance with the ADG guidelines for planting on structure.
- Tree locations shall be suitably spaced within the planter beds to avoid future conflicts with structures. Overplanting of tree species is to be avoided to allow for full canopy growth.