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# STATE SIGNIFICANT DEVELOPMENT SCOPING REPORT

## 2A GREGORY PLACE, HARRIS PARK



Submitted to Department of Planning, Environment and Industry

October 2021

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<b>Attachment 14</b>	Community Housing Provider Letter
<b>Attachment 15</b>	Capital Investment Value Report
<b>Attachment 16</b>	Site Compatibility Certificate July 2017

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## Contact

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Version 1 – 26 October 2021

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# 1. Introduction

This Scoping Report has been prepared on behalf of 2A Gregory Place Pty Ltd to request the Secretary's Environmental Assessment Requirements (SEARs) for the preparation of an Environmental Impact Assessment (EIS) to accompany a State Significant Development Application (SSDA) for a proposed build-to-rent (BTR) residential development at 2A Gregory Place, Harris Park in the City of Parramatta local government area (LGA).

As the proposal is for 'build-to-rent housing' with a capital investment value (CIV) of more than \$100 million (with at least 60% of the capital investment value related to the tenanted component) on land within the Greater Sydney Region, the development is State Significant Development (SSD) under State Environmental Planning Policy (State and Regional Development) 2011. Section 1.4 of this report provides an indicative calculation of the CIV of the project, which confirms the proposal exceeds the threshold.

The project includes approximately 483 dwellings across a total of 48,685sq.m of total gross floor area at an FSR of 2.5:1 within three (3) freestanding building forms that are arranged into an orthogonal layout of five fingers that vary in height from 4-8 storeys. The scheme incorporates 13,210m<sup>2</sup> (67.10%) of landscaped area on the ground plane, comprising courts, passages, accessways, parks and the Clay Cliff Creek channel walk.

The application seeks consent for a Concept approval at this stage, to confirm the building footprints, massing, elevations, and access and movement arrangements. The application does not seek consent for development.

The Concept Masterplan seeks consent under section 4.22 of the Environmental Planning & Assessment (EP&A) Act 1979 for the concept footprint as described in the attached plans. Specifically, the aspects of the final development included in the concept for which approval is sought are:

- a) the building footprint locations,
- b) building elevation and massing,
- c) setbacks and building separation;
- d) the location of internal pedestrian links and circulation,
- e) location of the site entry and exit, and
- f) open space/park and landscaping.

This Scoping Report has been prepared in accordance with the DPIE Guideline '*Scoping an Environmental Impact Statement: Draft Environmental Impact Assessment Guidance Series*' dated June 2017. It provides preliminary information on the project and considers its potential impacts, and specifically includes the following:

- Site details
- Project description
- Justification and alternatives considered
- Statutory Planning Framework
- Strategic Planning Context
- Relevant matters for consideration
- Scale and nature of the impacts of the project
- Environmental Impact
- Stakeholder engagement
- Proposed approach to assessment

## 1.1 Project Overview

Address	2A Gregory Place, Harris Park, 2150
Legal Description	Lot 2 in DP 802801
Site Area	19,480sq.m
Project	<p>To develop a build-to-rent scheme of three (3) freestanding building forms that are arranged into an orthogonal layout of five fingers that vary in height from 4-8 storeys, and incorporates 13,210m<sup>2</sup> (67.10%) of landscaped area on the ground plane, comprising courts, passages, accessways, parks and the Clay Cliff Creek channel walk.</p> <p>The project includes approximately 483 dwellings and 48,685sq.m of total gross floor area at an FSR of 2.5:1.</p>
Land Owner	2A Gregory Place Ltd
Local Government Area	City of Parramatta
Locality	Harris Park
Current Zoning	IN1 General Industrial
Permissibility	<p>The site is zoned IN1 General Industrial, under which “Residential flat buildings” are prohibited under the Parramatta LEP 2011.</p> <p>However, on 19 July 2017, a Site Compatibility Certificate (SCC) was issued by the Department of Planning and Environment under the provisions of Clause 37 of Division 5 of the Affordable Rental Housing (ARH) SEPP 2009.</p> <p>The ARH SEPP provides for incentives by way of expanded zoning permissibility, floor space ratio bonuses and non-discretionary development standards. In this case, the SCC provides under Schedule for the development of a “<i>Residential flat development with a minimum of 50% of all residential product being made available for affordable rental housing for a minimum of 10 years</i>”.</p> <p>As the scheme is for a build-to-rent development of which a minimum of 50% will be dedicated to affordable housing, the application is prepared under the provisions of Division 6A Build-to-Rent Housing of the ARH SEPP.</p>
Indicative Capital Investment Value	<p>\$143,000,000</p> <p>Refer to QS Report at Attachment 15. Note that further detail of CIV of build-to-rent component will be provided with the EIS.</p>

**Table 1:** Project Overview



## 1.2 Supporting Documentation

Attachment	Report	Author
Scoping Report		Pacific Planning
Attachment 1	Site Survey	StrataSurv
Attachment 2	Concept DA Drawings	Stanisic
Attachment 3	Concept Design Report	Stanisic
Attachment 4	Flooding Letter	GRC Hydro
Attachment 5	Contamination	Sullivan Environmental Services
Attachment 6	Landscape Report	Taylor Brammer
Attachment 7	Scoping Study Cultural Heritage Summary	GBA Heritage
Attachment 8	Archaeological Heritage Impact Assessment	Dominic Steele Consulting Archaeology
Attachment 9	Presentation to Heritage Council NSW	Project Team
Attachment 10	Heritage Council NSW Minutes March 2021	Heritage NSW
Attachment 11	Site Primer	The Fulcrum Agency
Attachment 12	Alec Tzannes Peer Review Minutes	Alec Tzannes
Attachment 13	Preliminary Traffic Assessment	Traffic Solutions
Attachment 14	Community Housing Provider Letter	Pacific Community Housing
Attachment 15	Capital Investment Value Report	QPC&C
Attachment 16	Site Compatibility Certificate July 2017	Issued by Department of Planning, Industry and Environment

**Table 2:** List of Scoping Report supporting documentation

### 1.3 Background

The planning for the site has been in progress for a number of years, with a Planning Proposal being prepared over a number of meetings and design workshops in 2015, with strategic planning; heritage; and urban design staff of Parramatta Council. These workshops considered design principles, preliminary building footprints and potential built forms for the site. Having regard to the significant heritage items within the immediate vicinity of the site, agreement was reached on developable areas, informed by a set of adopted Design Principles such as the protection of view corridors, landscape settings, variation in heights, densities and building forms and active presentation to the site boundaries.

At that time, a concept for the site was developed based upon the adopted design principles in response to the two heritage view cones, from Experiment Farm to Hambledon Cottage and the other from Elizabeth Farm to Hambledon Cottage. Buildings within the centre of the site reached 35 storeys, with 4 to 11 storeys in other locations. The built form and massing is illustrated in Figure 1 below.



**Figure 1:** Concept Design 2015 (Source: Stanasic Architects)

Subsequently, on 27 October 2016 a meeting was held with Department of Planning and Environment staff to discuss the proposal, and the potential to provide significant affordable housing in a strategically well positioned location due to its proximity to transport and services. The Department was briefed on the proposed development outcome and the potential mechanism to achieve this through the ARH SEPP. The SCC application was lodged in December 2016.

### 1.3.1 Site Compatibility Certificate

The State Environmental Planning Policy (Affordable Rental Housing) 2009 (ARH SEPP) applies to land in the Sydney region within 800 metres of a public entrance to a railway station of light rail station *“but not if development for the purposes of a residential flat building is permissible on the land under another environmental planning instrument”*.

The ARH SEPP provides for incentives by way of expanded zoning permissibility, floor space ratio bonuses and non-discretionary development standards. As the site is zoned IN1 General Industrial, under which “Residential flat buildings” are prohibited, an application was made in December 2016 for a Site Compatibility Certificate to the then Department of Planning and Environment pursuant to the provisions of Division 5 of the ARH SEPP.

On 19 July 2017, under the provisions of Clause 37 of Division 5 of the ARH SEPP a Site Compatibility Certificate (SCC) was issued by the Department of Planning and Environment.

The SCC provided as follows:

*I certify that in my opinion:*

- *The site described in Schedule 1 is located in the Sydney Region within 800 metres of a rail station;*
- *The development described in Schedule 1 is compatible with the surrounding land uses, having regard to the matters set out in Clause 37(6)(b); and*
- *That development for the purposes of affordable rental housing is not likely to have an adverse effect on the environment and will not cause any unacceptable environmental risks to the land uses subject to the requirements specified in Schedule 2 of this certificate.*

The development of the site described in Schedule 1 of the SCC is as follows:

*“Residential flat development with a minimum of 50% of all residential product being made available for affordable rental housing for a minimum of 10 years”*

Schedule 2 of the SCC provided requirements to be addressed as part of the preparation of the application. This has resulted in a thorough process over a number of years to develop the project narrative and understand the historic cultural landscape to assist inform the final development layout for the site. This has included a detailed consultation process, in accordance with condition 2 below, with NSW Office of Environment and Heritage and the Heritage Council of NSW.

Schedule 2 of the SCC provided as follows:

1. *Prior to lodgement of a development application, a partnership with a social housing provider will be in place in accordance with Division 5 of State Environmental Planning Policy (Affordable Rental Housing) 2009.*
2. *Consultation with the NSW Office of Environment and Heritage and the Heritage Council of NSW regarding bulk and scale, and design principles to protect surrounding heritage items is to be undertaken through the development application process.*

3. *The final development layout, design and number of dwellings will be subject to the consent authority being satisfied with the resolution of issues relating to:*
- *surrounding heritage items;*
  - *form, height, bulk, scale, setbacks, landscaping and residential amenity; and*
  - *traffic and access, flood risk management and soil contamination.*

*These matters are to be determined through the assessment of the development application under section 79C of the Environmental Planning and Assessment Act 1979.*

In accordance with the SCC, consultation with NSW Office of Environment and Heritage and the Heritage Council of NSW commenced and the concept was refined over a number of years and a number of working sessions. The final presentation to the Heritage Council of NSW is included at Attachment 9 and the Heritage Council Minutes supporting the progression of the project to Stage 1 DA is included at Attachment 10.

Further, in relation to condition 1 above, Pacific Community Housing (PCH) will provide community housing in their capacity as a registered tier three Community Housing Provider under the national regulatory framework. A letter confirming the role of PCH is included at Attachment 14, in addition to the Certificate of Registration with the National Regulatory System for Community Housing.

A detailed response to the conditions of the SCC will be included within the EIS and formal lodgement of the Concept application.

This Scoping Report seeks the Secretary's Requirements for the subject concept plan for a future DA process.

### **1.3.2 The Project Narrative**

The subject site at 2A Gregory Place, Harris Park is located within a rich, multi-layered and evolved historic cultural landscape, on the eastern edge of the Parramatta CBD. Many of these integrated, interlocking values are related to both the Harris Park locality and the subject site.

The site presents a unique opportunity to replace a large, redundant industrial complex with a new high quality, low rise, medium density residential project, containing a high proportion of affordable housing, into an historic parkland setting, located in close proximity to the Parramatta CBD.

The project brings together a deep understanding of the natural and geological background at the tidal head of the Parramatta River, of the Aboriginal connections to country, of the evolving historic cultural and natural landscape of Harris Park with its three early 19th century cottage complexes, and of the urban context of the current site. The site planning and architectural massing have responded to this overlapping complexity to provide a maximum residential yield within an acceptable and well considered development proposal.

The large site is located within a triangle formed by three early Colonial NSW State listed historic properties and by the escarpment backdrop of the central portion of the historic Clay Cliff Creek.

Through the working sessions within the project team and in consultation with Heritage Council NSW, a set of design principles were established that moved away from the previous key design principle to protect view corridors and for built form and building footprints to allow for these visual connections. As these view corridors had been eroded over time by other developments and mature tree lines, it was felt that the concept should respond to the cultural landscape which resulted in a refined built form, footprints and scale to the development.

The primary design responses to the evolving cultural landscape include:

- Celebrate the importance of Clay Cliff Creek and Aboriginal habitation
- Retain and enhance the SHR settings and historical linkages
- Change from previous radial planning layout to extension of orthogonal grid from surrounding late 19th and early 20th century subdivisions, to south, east and west.
- Remove incongruous light industrial factory to facilitate residential continuity
- Continue the emerging urban scale of 8 storey buildings along Alice Street and Our lady of Lebanon

A final presentation and workshop was held on 2 March 2021 with the Heritage Council Approvals Committee (HCAC). The minutes of this meeting are included at Attachment 10, which note that the HCAC “*supports progression of the scheme to Stage 1 Development Application*”.

A project team with eminent consultants in their field has been established to understand the evolving cultural landscape context and setting and inform the concept design outcome. This has included:

- Project Architect – Stanisis Architects
- Heritage and design – GBA Heritage
- Aboriginal and non-aboriginal archaeology – Dominic Steele Consulting Archaeology
- Landscape Planning – Taylor Brammer
- Cultural landscape – The Fulcrum Agency
- Flooding – GRC Hydro
- Contamination – Sullivan Environmental Services
- Project Peer Review – Alec Tzannes

The primary design responses have been adopted to inform the current concept being considered through the State Significant Development (SSD) process and advanced under Division 6A Build-to-rent housing of the ARH SEPP.

A number of documents related to the historical context and emerging project narrative are included with this request for SEARs. These include:

Attachment 7 – Scoping Study Cultural Heritage Impact Assessment, prepared by GBA Heritage

Attachment 8 – Archaeological Study Cultural Heritage Summary, prepared by Dominic Steele Consulting Archaeology

Attachment 11 – Site Primer, prepared by The Fulcrum Agency

## 1.4 Peer Review Process

To ensure the highest standards of design, and to challenge the project team that has developed the concept in consultation with the Heritage Council of NSW, a peer review process commenced in August that included expert input to the project.

Alec Tzannes of Tzannes Associates and Otto Cserhalmi of OCP Architects are assisting with the development of the concept through a series of workshops and collaborative reviews. The purpose of the peer review process is “*to review the draft proposal prepared by the design team and provide high-level comment in relation*”

*to a Concept Development Application*". A copy of the peer review #2 minutes is included at Attachment 12 which provides a summary of the discussion and next steps.

The input to the design process will culminate in a final peer review report which will accompany the EIS lodgement following the issuing of SEARs.

## 1.4 State Design Review Panel

A meeting date has been scheduled with the Government Architect NSW State Design Review Panel for 9 December 2021.

Stanisic Architects are nominated Design Architect that will develop the Concept DA with the oversight of the appointed Design Review Panel to ensure the preservation of design excellence. This will continue throughout the project lifecycle through applications for development and other key project milestones.

Given the location and context of the site, achieving high standards in design excellence will be critical to the success of the project.

## 1.5 Consent Authority and Capital Investment Value

Development for the purpose of build-to-rent housing on land within the Greater Sydney Region is classified as State Significant Development (SSD) under State Environmental Planning Policy (State and Regional Development) 2011 where development has a capital investment value (CIV) of more than \$100 million (with at least 60% of the capital investment value related to the tenanted component).

This Scoping Report is supported by a letter that provides an indicative CIV of \$143,000,000. Of this, at least 60% will be related to the BTR tenanted component. This will be supported by a more detailed concept and supporting comprehensive QS Report with the EIS. The QS letter, prepared by QPC&C Quantity Surveyors is included at Attachment 15.

As such, the project is considered State Significant Development under the State and Regional Development SEPP and the Minister for Planning and Public Spaces.

## 2 Site Description and Context

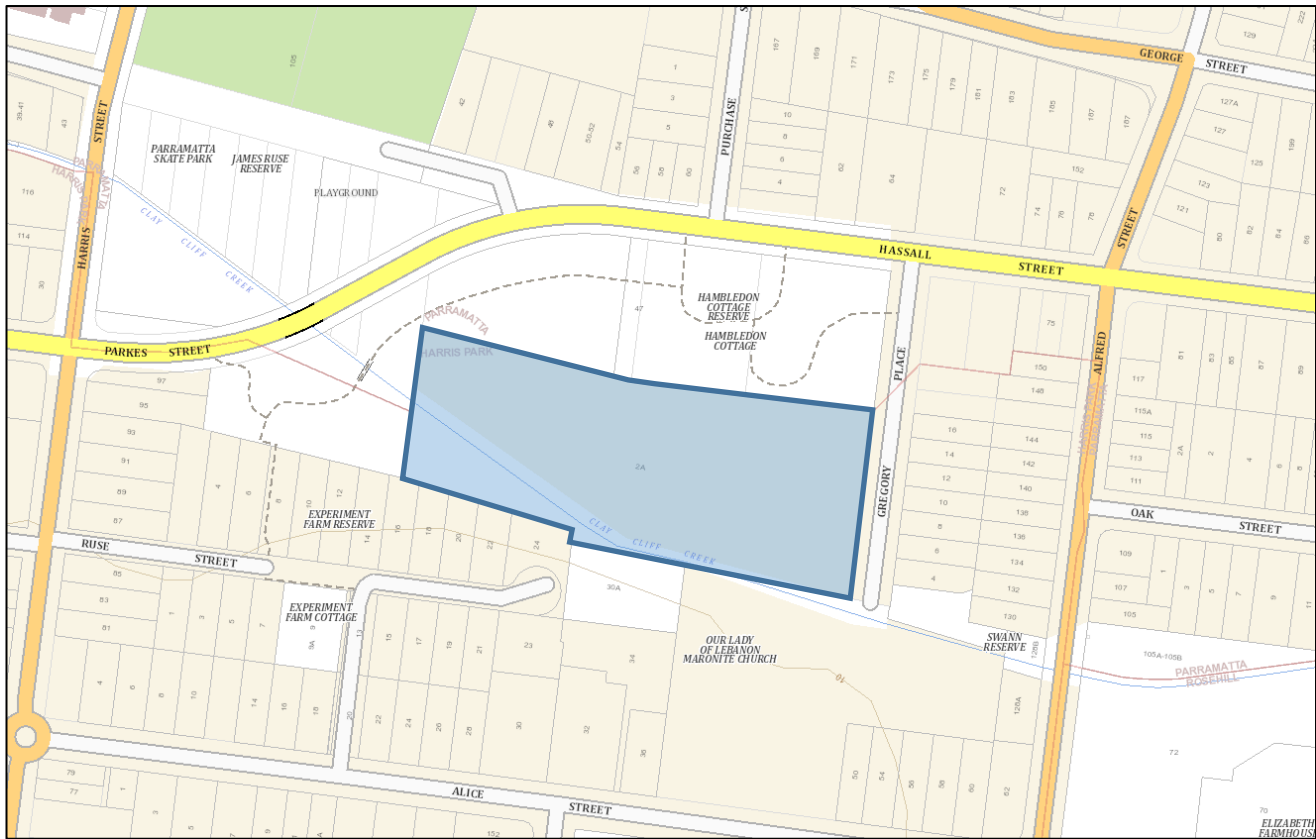
### 2.1 Site Identification

The site is known as 2A Gregory Place, Harris Park and has a legal description of Lot 2 in DP 802801

Address	Lot details	Area
2A Gregory Place, Harris Park	Lot 2 DP 802801	19,480 sq.m

**Table 3:** Site details

It has an area approximately 19,480sqm and has an irregular rectangular shape approximately 230m long to the north, 95m wide to the east and 75m wide to the west. Access to the Site is from Gregory Place.



**Figure 2:** Site Location (source: sixmaps)

The site is located just beyond the eastern boundary of the Parramatta City Centre to the south of Hassall Street, adjacent to Hambledon Cottage and Reserve, and the Experiment Farm Reserve.

The existing development on the site comprises a number of industrial buildings ranging in height from 2 to 8 storeys (equivalent). The site is currently used as commercial offices, however most of the site is dis-used and in decay, being the home of a former pharmaceutical manufacturing plant.





Figure 3: Site Identification Plan

The site is zoned IN1 General Industrial under the Parramatta Local Environmental Plan (LEP) 2011. development for the purpose of a 'residential flat building' is prohibited in the IN1 General Industrial zone.

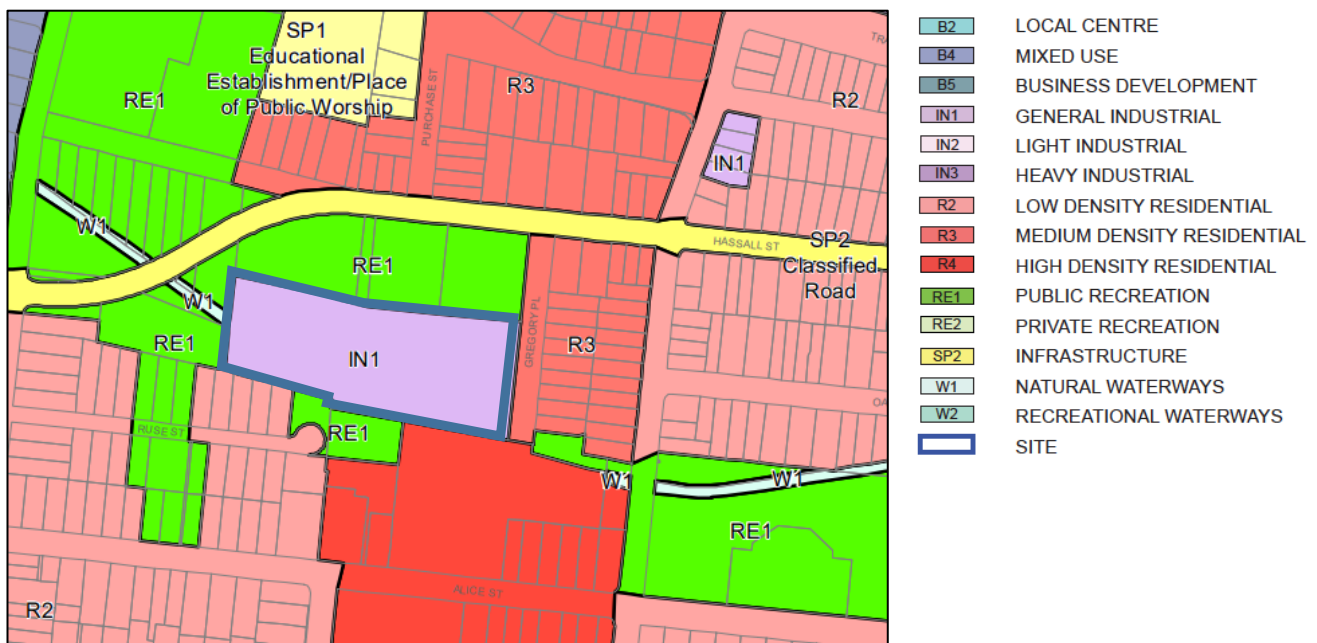


Figure 4: Parramatta LEP 2011 Zoning Map



## 2.2 Existing Environment

The subject site contains a disused former pharmaceuticals assembly and light industrial complex (ca.1950s) of no contemporary heritage significance.



**Figure 5:** Existing factory from western boundary



**Figure 6:** Existing factory directly behind Hambledon Cottage

To the north of the site is the State heritage listed Hambledon Cottage. Within the grounds are also two trees with heritage significance: the hoop pine and bunya tree. A driveway adjoining the heritage property to the north provides access to the site from Gregory Place to a hardstand car parking area at the western end of the site. Vehicular access across the adjoining reserve to Parkes Street has been removed, with access only provided from Gregory Place.

A stormwater channel is located to the south of the site known as Clay Cliff Creek. This is characterised by graffiti, chain wire fences, rubbish and untamed weeds. Our Lady of Lebanon (LOL) Church is located to the south of the stormwater channel on top of the remnant clay cliff. The height of the clay cliff is equal to approximately the height of an 8 storey building. Further, residential buildings to the south located on top of the remnant clay cliff range from single storey detached dwellings to 8 storey residential flat buildings further exacerbating the perceived heights of buildings from the subject Site.

## 2.3 Regional and Local Context

The site has strategic importance being a large remnant industrial site located 200 metres from the boundary of the Parramatta City Centre. The site is very well serviced and located in proximity to public transport, being approximately 500 metres from the Harris Park Station and 700 metres from Parramatta, Rosehill and Camellia train stations.

The site is also very well located in proximity to the Parramatta Light Rail, connecting the site to Westmead in the west and Carlingford in the east, via a two-way track spanning 12 kilometres, which is expected to open in 2023. The Harris Street light rail stop is approximately 300 metres away and the Tramway Avenue stop is approximately 450 metres away.

This site's importance is heightened as it sits between the Parramatta City Centre and Camellia and is also located adjacent to areas of heritage significance. The site's interface with the heritage and historical landscape has been a primary driving principle behind the evolution of the design principles and conceptual development of the site as considered through this report.

This site is also in close proximity to Western Sydney University and Rosehill Racecourse, and within 1.5km of Victoria Road, the M4 motorway and from the Great Western Railway Line.

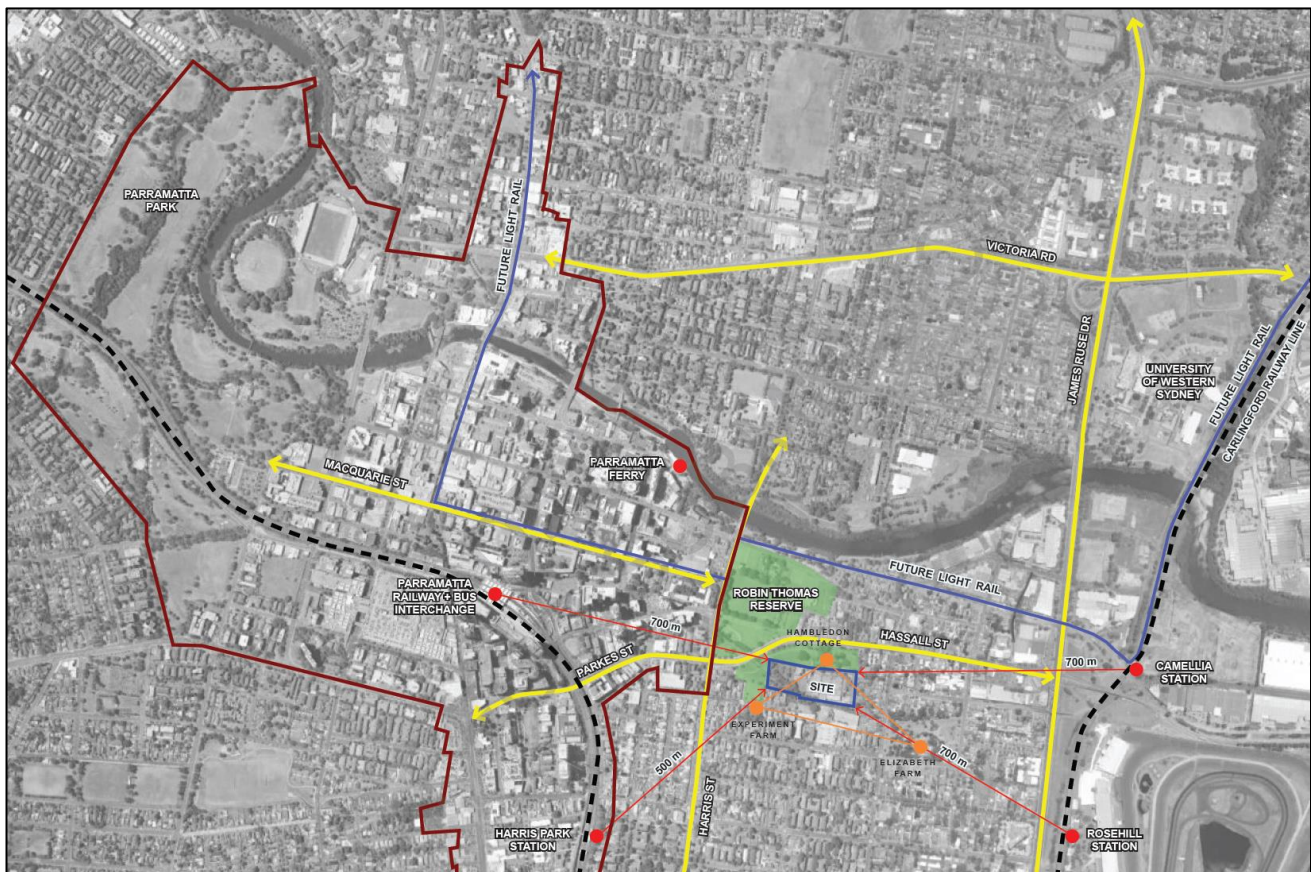


Figure 7: Site Context (source: Stanisis Architects)



### 3. Description of Project

#### 3.1 Building Envelopes

The proposal is for the redevelopment of 2A Gregory Place, Harris Park for residential apartment development in accordance with the objectives and provisions of the ARH SEPP. Specifically, the application will include five (5) key building blocks as illustrated in Figure 8 below.

A Concept design has been prepared by Stanisis Architects, which is included at Attachment 2. This is also supported by a draft Concept Design Report which is included at Attachment 3. It is noted that the Architectural Design Concept is described by Stanisis Architects as follows:

*“The architectural design concept is for 3 x freestanding building forms that are arranged into an orthogonal layout of five fingers that vary in height from 4-8 storeys and adjust to the scale of the existing and future context, including remaining colonial cottages. The built form has been embedded within a parkland setting of courts and passages that creates a framework for permeable pedestrian movement to enable physical and visual connections to the rich cultural landscape setting”.*



Figure 8: Block Diagram (source: Stanisis Architects)

#### 3.2 Building Heights

The site has a diagonal cross fall of 1340mm from the north west corner of the site to the existing stormwater channel to the south west of Gregory Place. On the small triangular parcel of land to the south of the stormwater channel, the site rises by 2-3 storeys.

Building height has been distributed across the site to adjust to the surrounding context, including the remaining colonial cottages.

The built form varies in height from 4-8 storeys and adjust to the scale of the existing and future context. Immediately behind Hambledon Cottage, the built form has been reduced in height and increases to the south along the stormwater channel. Roof terraces are integrated on the lower forms to provide additional communal open space and mitigate the impacts of built form on the site.

Along Gregory Place, the built form has been setback above level 4, at the height of the existing and future tree canopy and to adjust to the low-rise existing buildings along Gregory Place. The proposed building heights will be taller than those that currently exist on Gregory Place, but they do not need to be the same to be compatible. In order to separate existing low-scale built form from proposed taller forms on the site, mature tree planting along Gregory Place is used as a tool to clearly define a boundary between the two different places.

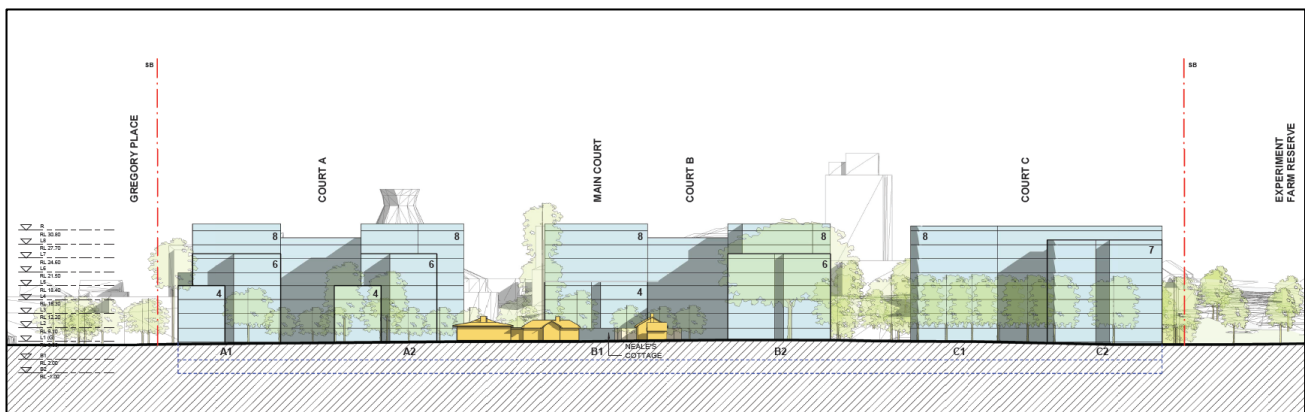


Figure 9: North Elevation (Source: Stanisc Architects)

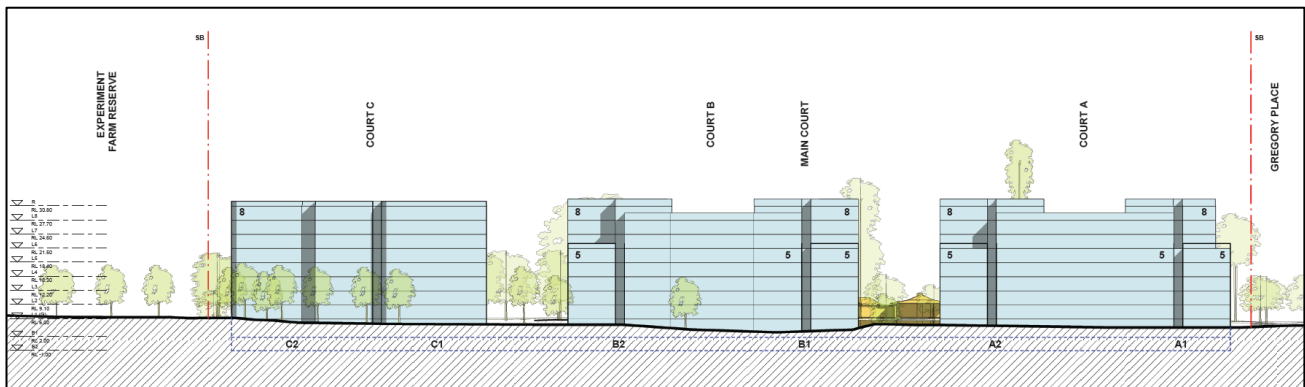


Figure 10: South Elevation (Source: Stanisc Architects)

### 3.3 Building Separation and Setbacks

Detailed consideration and consultation was undertaken with the Heritage Council of NSW that informed the footprints and building footprints. This was heavily informed by setbacks, especially to adjoining heritage and lower density, and building separations.

The following is noted as particularly relevant from the Stanisc Architects Concept Design Report at Attachment 3:

- The proposed street setback along Gregory Place is 5.5m to 8.0m, setting back to 8.0m above Level 4. The existing street setbacks along the eastern side of Gregory Place vary from 8 to 12m. While the lower-level street setback is less than existing setbacks along Gregory Place, there are no other buildings along the western side of Gregory Place and this site is already different from its context being a factory with high site coverage. The reduced setback to Gregory Place is offset by increased open space directly behind Hambledon Cottage as recommended by Heritage NSW (HCAC) and is the result of redistributing accommodation across the site to maintain lower building heights in accordance with HCAC further guiding recommendations.
- The northern setback, along the boundary with Hambledon Cottage, varies from 6m to the west, 24m directly behind Hambledon Cottage and 10m to the east. These setbacks are consistent with the built form supported by the HCAC to proceed to a design excellence process. This setback allows for the retention of large tree screen planting and a large main court to mitigate the impact of the built form directly behind Hambledon Cottage.
- There is a 5.0m side setback to the west boundary with the parkland which maintains existing large tree screen planting.
- The southern setback is 6m from the stormwater channel easement to the south of the site. Other existing buildings along the channel have a 0 - 3m setback.

### 3.4 Landscaping and Open Space

A key element of the design principles is the landscaping strategy for the site. The site was once part of a fertile landscape that was a rich source of food and water for First Nations peoples and European colonisers. The rejuvenation of this landscape has significant opportunities, to acknowledge the importance of place and the overlapping and shared experiences of First Nations Peoples, European Colonisers and Multicultural communities.

The landscaping concept has been developed with regard to the strategic framework established through the Heritage NSW consultation process and the historical interpretation of the site within its context. The expert team of heritage and landscape consultants have come together in the preparation of the design principles and translation of the strategic framework in order to reflect the cultural landscape and historical narrative in to a landscaping vision.

As discussed within the attached Concept Design Report prepared by Stanistic Architects (Attachment 3), the landscape concept plan for the site has been developed with regard to the following characteristics:

- Original line of the original Clay Cliff Creek interpreted with native grasses and reeds.
- Parramatta Sand Body and topographical fluctuations over time acknowledged through interpretation.
- Creek walk with interpretation of Indigenous and European shared experiences including stories of land dispossession and conflict.
- 'Restoring the Rivers' with native reeds and incorporation of natural features to the creek.
- Markers that Acknowledge and Welcome to Country and key precinct entries.
- Planting palette that incorporates endemic species.
- Fertile landscapes that embrace the theme of bountiful harvest with productive garden areas.
- Shared-way with native tucker walk to include interpretation and discussion on Aboriginal land management and those of early colonial times.
- Connection between sustainability measures and connection with Country.
- Exploration of Aboriginal foods through the use of bush tucker plants, endemic to the area.
- Neale's Cottage interpreted in brick foundation and gravel.

The open space and landscaping creating through the above characteristics has resulted in the following design outcomes:



- The establishment of major plantings along Hassall Street that reinforce the existing vegetated mass to the area. The role of these new trees and other established trees within the immediate curtilage of Hambledon Cottage is retain and supplement the major vegetated open space gateway to the Parramatta City Centre.
- The installation of large and statuesque street trees along Gregory Place to define a vegetated interface to the low-rise built form to the east of Gregory Place that marks the boundary to this special sub-precinct.
- Retention of existing trees retained, particularly the line of Brush box trees to the west of Hambledon Cottage to reinforces the landscape and heritage curtilage of the Cottage and to accentuate the significant landmark plantings around Hambledon Cottage.
- Creating new publicly accessible connections through the site that extend existing pathways through the context.

The Landscape Report, prepared by Taylor Brammer Landscape Architects is included at Attachment 6. An extract of the landscape concept is included at Figure 11 below.

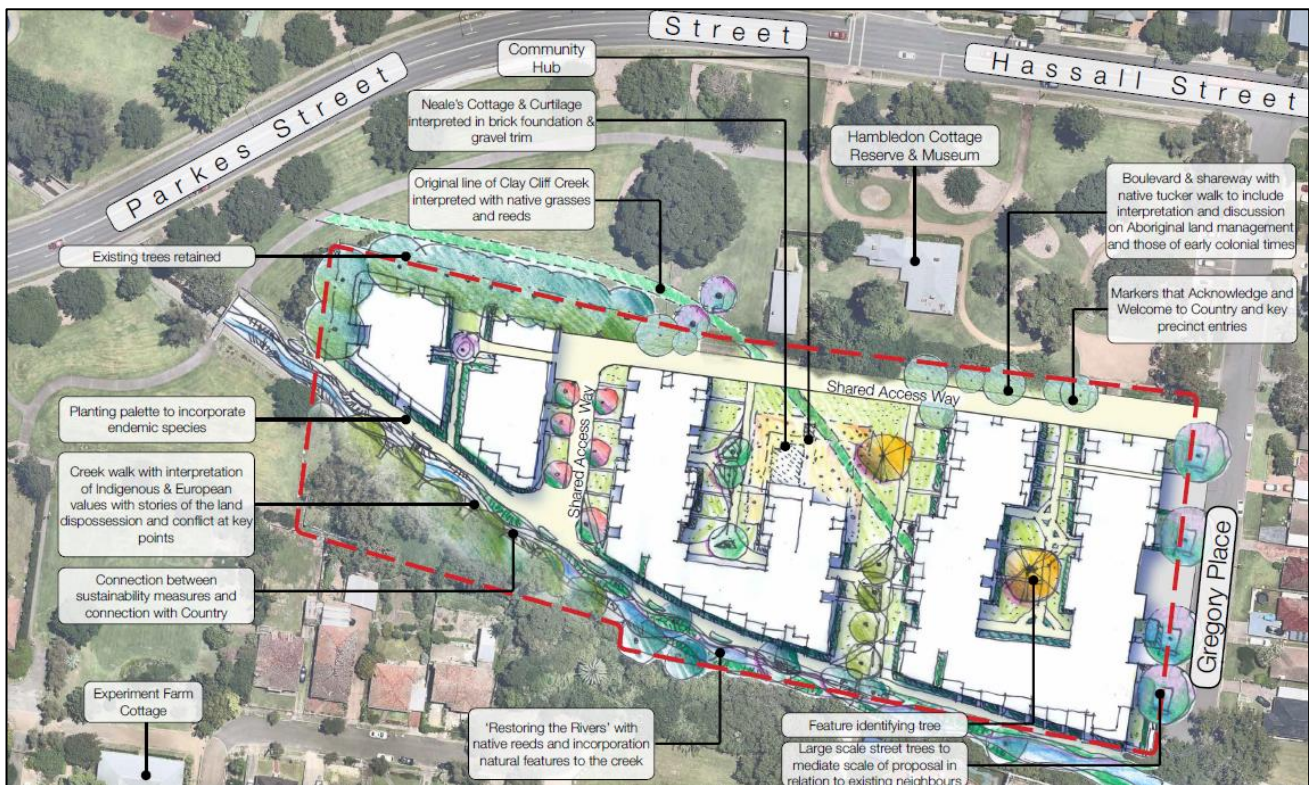


Figure 11: Landscape Concept (Source: Taylor Brammer)

### 3.5 Access and Roads

In terms of access and operation arrangements for traffic and parking, the following is noted:

- The site has only one street frontage to Gregory Place.
- All parking is contained within two basement levels including a loading area for garbage collection. It is proposed that there are two separated access points along Gregory Place for residents and their visitors and another for loading.
- The basement is contained within a large perimeter wall that is setback a minimum of 6m from all site boundaries/ stormwater channel.
- The loading area is contained within a two-storey high space that permit heavy rigid vehicles to collect garbage and for loading and unloading of goods.

- There is a shared way along the northern boundary of the site, similar to what currently exists that will be used primarily by pedestrians, but will permit access for emergency services when required.
- Both driveways have a crest at the flood planning level and flood gates will be installed to the maximum possible flood level.
- The residential entry into the basement continues below ground along an access spine for ease of navigation and to minimise the travel distances to the furthest parking spaces. This aisle also connects all the different building cores.

In terms of traffic impacts and generation, this is addressed further under Section 5.4.

## 4 Relevant Planning Considerations

The application will be required to consider the following legislation, Acts, environmental planning instruments and requirements related to the site for consideration of the SSDA:

- Environmental Planning and Assessment Act 1979
- NSW Biodiversity Conservation Act 2016
- State Environmental Planning Policy (State and Regional Development) 2011
- State Environmental Planning Policy No 65 – Design Quality of Residential Apartment Development
- State Environmental Planning Policy (Affordable Rental Housing) 2009
- State Environmental Planning Policy No 55 – Remediation of Land
- State Environmental Planning Policy (Infrastructure) 2007

### 4.1 Environmental Planning & Assessment Act 1979

Division 4.7 State Significant Development of the EP&A Act 1979 provides for development to be declared as State Significant Development. Clause 4.36 of the Act details that *“A State Environmental Planning Policy (SEPP) may declare any development, or any class or description of development, to be State Significant Development.”*

Section 4.38 of the EP&A Act 1979 provides for the approval mechanism for State Significant development. Subsection (3) also states:

- (3) *Development consent may be granted despite the development being partly prohibited by an environmental planning instrument.*

It is noted that in this case, the development is permitted through the provisions of Division 5 of the ARH SEPP, being *“Residential flat development with a minimum of 50% of all residential product being made available for affordable rental housing for a minimum of 10 years”*.

The concept application has been through a thorough process working in consultation with the NSW Office of Environment and Heritage and the Heritage Council of NSW to address the conditions of Schedule 2 of the SCC particularly related to surrounding heritage items, form, height, bulk, scale and setbacks.

The relationship of the proposed development with the provisions of the Parramatta LEP 2011 and provisions of the SCC issued under Division 5 of the ARH SEPP are discussed in further detail below.

### 4.2 NSW Biodiversity Act 2016

The Biodiversity Conservation Act 2016 (BC Act) commenced in August 2017 and changed the way the impacts on biodiversity are assessed for State Significant Development (SSD). The BC Act requires that an SSD or SSI application must be accompanied by a biodiversity development assessment report (BDAR) unless the Planning Agency Head (or delegate) and the Environment Agency Head (or delegate) determine that the proposed development is not likely to have any significant impact on biodiversity values. i.e. a BDAR waiver.

The site contains old remnant industrial buildings associated with its former use as a pharmaceutical manufacturing plant. The site is largely covered, with the eastern end covered by an at grade car park, however



there is some remnant vegetation within and around the car park. It is also noted that within the curtilage of Hambledon Cottage, two heritage significant trees are located being the hoop pine and bunya tree.

The site is within the endangered Cumberland Plain and includes some vegetation along the clay cliff creek line, and to the south of the creek line in the south west corner of the site. A tree line is also located along the northern boundary to Hambledon Cottage. Refer to Figure 12 Below.

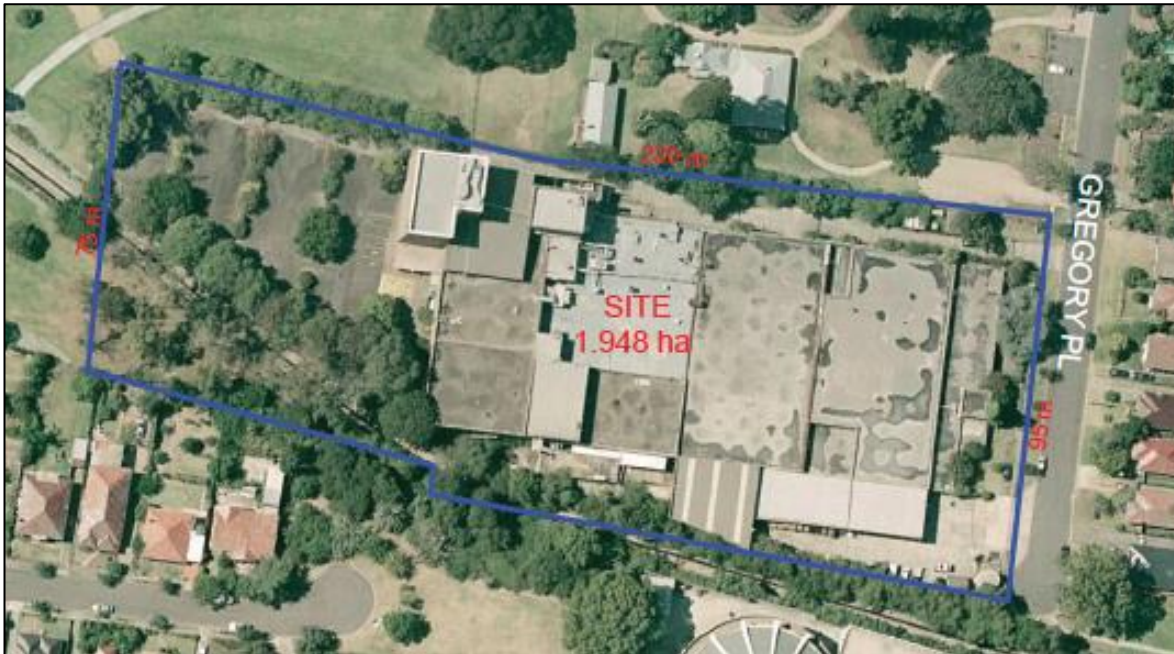


Figure 12: Aerial view of site and vegetation

Historical observations of the landscape dating back to 1788 was of open grassland and widely spaced trees and shrubs free of underwood. Given the location of the site and surrounding context, a Biodiversity Development Assessment Report (BDAR) may be required to be prepared by an accredited person applying the biodiversity assessment method (BAM). It is noted that advice will be sought to assist determine whether the requirement for a BDAR can be waived. It is noted that a proposed development could be considered as unlikely to have any significant impact on biodiversity values if it:

- *will not clear or remove native vegetation other than:*
  - *a few single trees with no native understorey in an urban context*
  - *planted native vegetation that is not consistent with a Plant Community Type (PCT) known to occur in the same Interim Biogeographic Regionalisation of Australia (IBRA) subregion (e.g. street trees, trees in carparks, landscaping)*
- *will have negligible adverse impacts on threatened species or ecological communities, considering habitat suitability, abundance and occurrence, habitat connectivity, movement and water sustainability including consideration of any non-natural features, non-native vegetation and human-built structures*
- *will have negligible adverse impacts on protected animals because of impacts to flight path integrity.*

If a waiver is to be sought, this will be submitted prior to the lodgement of the EIS.

## 4.3 State Environmental Planning Policies

Further to the above list of SEPPs that will need to be considered as part of this application, the following preliminary consideration is provided below.

### 4.3.1 State Environmental Planning Policy - State and Regional Development 2011

Schedule 1 of the State Environmental Planning Policy (State and Regional Development) 2011 (the SRD SEPP) identifies development declared as State significant for the purposes of the Act.

The proposed development is for ‘build-to-rent housing’ with a capital investment value (CIV) of more than \$100 million (with at least 60% of the capital investment value related to the tenanted component) on land within the Greater Sydney Region. The following provisions of the SEPP apply:

#### 27 **Build-to-rent housing**

- (1) *Development permitted under Part 2, Division 6A of [State Environmental Planning Policy \(Affordable Rental Housing\) 2009](#) if—*
  - (a) *the proposed development has a capital investment value of—*
    - (i) *for development on land in the Greater Sydney Region—more than \$100 million, or*
    - (ii) *for development on other land—more than \$50 million, and*
  - (b) *the tenanted component of the proposed development has a value of at least 60% of the capital investment value of the proposed development, and*
  - (c) *for development on land in Zone B3 Commercial Core—the proposed development does not involve development that is prohibited under an environmental planning instrument applying to the land, other than development for the purposes of multi dwelling housing, residential flat buildings or shop top housing, and*
  - (d) *for development on other land—the proposed development does not involve development that is prohibited under an environmental planning instrument applying to the land.*
- (2) *Subclause (1) does not apply to development on land within the area of the City of Sydney.*
- (3) *In this clause—*

**Greater Sydney Region** has the same meaning as in the [Greater Sydney Commission Act 2015](#).

**tenanted component** has the same meaning as in clause 41A of [State Environmental Planning Policy \(Affordable Rental Housing\) 2009](#).

### 4.3.2 State Environmental Planning Policy (Affordable Rental Housing) 2009

#### Division 6A Build-to-rent housing

On 12 February 2021 State Environmental Planning Policy Amendment (Build-to-rent Housing) 2021 was made to introduce Build-to-rent (BTR) housing into the planning system. BTR housing has the potential to provide more rental housing choice and to support construction jobs and drive economic recovery. Division 6A applies to development that contains at least 50 dwellings occupied by residents under a tenancy agreement and facilitates concessions in relation to the application of SEPP 65 and the ADG.

Division 6A applies to development for the purposes of multi dwelling housing, residential flat buildings or shop top housing on land in a zone in which development for the purposes of residential flat buildings is permissible under another environmental planning instrument. In this case, ‘Residential flat buildings’ are

made permissible by a Site Compatibility Certificate issued on 19 July 2017 by the Department of Planning, Industry and Environment under Clause 37 of Division 5 of the ARH SEPP.

Of particular relevance to this project is the introduction of a State Significant Development (SSD) pathway for BTR housing developments where the CIV of the development is more than \$100 million and the BTR component has a value of at least 60% of the CIV of the proposed development.

This Scoping Report is supported by indicative concept plans at Attachment 2 and a draft Concept Design Report at Attachment 3. It demonstrates an indicative dwelling yield of approximately 483 dwellings within three (3) freestanding building forms that are arranged into an orthogonal layout of five fingers that vary in height from 4-8 storeys. Therefore, Division 6A applies as the quantum of dwellings is greater than 50.

Further, the development has a CIV of greater than \$100 million, of which greater than 60% will be related to the BTR tenanted component. This is supported by a letter prepared by QPC&C Quantity Surveyors that provides a total indicative CIV of \$143,000,000. This is included at Attachment 15. A more detailed QS Report will be prepared and submitted with the EIS lodgement, that will provide a more detailed breakdown of the CIV of the tenanted component.

#### **4.3.3 State Environmental Planning Policy 55 Remediation of Land**

A Phase 1 Contamination Investigation was conducted in 2015 by Sullivan Environmental Sciences to appraise existing and historical activities on the site, assess the potential for land contamination from those activities, and assess the need for further investigation.

The Phase 1 was finalised and issued on 26 August 2015 concluding that *“historic activities at the site may have caused potential site contamination and may pose a potential health risk”*. It was recommended to conduct a Phase 2 contamination investigation to address contamination concerns within identified areas of the site.

A letter has been prepared by Sullivan Environmental Services in support of this SEARs request. The letter is included at Attachment 5. The letter advises that a site inspection was undertaken on 10 September 2021 in order to observe the site conditions in comparison to the conditions at the time of the Phase 1 report.

Based on that site inspection, Sullivan Environmental Services concludes that:

*“site conditions and activities appear identical to those that were observed in the Phase 1 report. To the best of my knowledge, I can confirm that since the Phase 1 report was finalised in 2015 no additional activities on the site since that time raise any further contamination concerns and the conclusions of the Phase 1 remain valid”.*

It is noted that Sullivan Environmental Services have been engaged to undertake a Phase 2 Assessment for the site and in support of the EIS lodgement, which will address all matters raised in the Phase 1 assessment.

#### **4.3.4 State Environmental Planning Policy 65 Design Quality of Residential Apartment Development**

SEPP 65 seeks to improve the design quality of residential apartment development and enhance streetscapes and neighbourhoods in New South Wales to deliver a better living environment for the residents now choosing this form of housing. It does this by establishing a consistent approach to the design and assessment of apartments and the way they are assessed.

The concept design has been guided by:

- The Design Quality Principles in Schedule 3 of the *State Environmental Planning Policy No 65 – Design of Residential Apartments*;
- The objectives contained within Parts 3 & 4 of the Apartment Design Guide; and
- The Design Criteria within Parts 3 & 4 of the Design Guide.

The concept design layout being three freestanding building forms that are arranged into an orthogonal layout of five fingers has been designed firstly and primarily to respond to its sensitive context (i.e. compatibility) and secondly to comply with the requirements of the ADG.

It is noted that page 2 of the Concept DA drawing set prepared by Stanisis Architects (Attachment 2) and page 3 of the Concept Design Report prepared by Stanisis Architects (Attachment 3) provides a summary of compliance with key prescriptive criteria of the Apartment Design Guide.

Further, the EIS submission will address in detail compliance with the Apartment Design Guide, noting the flexibility in compliance facilitated by Clause 41E(2) of Division 6A of the ARHSEPP 2009.

However, for the purpose of the request for SEARs, the following compliances are relevant:

- The concept achieves 62.1% (298/483 of apartments) cross ventilation, greater than the ADG target of 60%.
- The concept achieved 70.2% (339/483 of apartments) achieve in excess of 2 hours of direct sunlight to all living rooms and private open spaces at mid-winter which meets the 70% guidelines of the ADG.
- All living rooms achieve the minimum width of 3.6 metres for 1 bed apartments and 4 metres for 2 and 3 bedroom apartments.
- All apartments have private open spaces that are accessed directly from the living and have external areas of 8 sq.m for 1 bed apartments, 10 sq.m for 2 bed apartments and 12 sq.m for 3 bed apartments which satisfy the guidelines of the ADG.
- Lift and stair cores are contained within the overall form of the building and are organised around multiple cores with 8-10 apartments off a single core.
- The development provides excellent amenity to all residents with large open spaces at ground level and on roof terraces that receive direct sunlight between 9am and 3pm at mid-winter due to their northern orientation.

## 4.4 Parramatta LEP 2011

Parramatta Local Environmental Plan (LEP) commenced on the 7 October 2011 when it was published on the NSW Government Legislation website.

Table 4 below summarises the Parramatta LEP 2011 principal development standards that currently apply to the subject site:

Summary of Existing Planning Controls	
Control	PLEP 2011
Zoning	IN1 – General Industrial

<b>Floor Space Ratio</b>	N/A
<b>Height of Buildings</b>	9.2 metres ("J2")
<b>Heritage</b>	None Adjacent to Items of Environmental Heritage
<b>Acid Sulfate Soils</b>	Class 4 and Class 5

Table 4: Site Development Standards

#### 4.4.1 Land Use Zone

The site is zoned IN1 General Industrial under which, under which 'residential flat buildings' and 'shop top housing' are prohibited. The proposed concept plan will facilitate the future development of the site for 'residential flat buildings'.

As previously discussed, as the site is zoned IN1 General Industrial, under which "Residential flat buildings" are prohibited, an application was made in December 2016 for a Site Compatibility Certificate to the then Department of Planning and Environment pursuant to the provisions of Division 5 of the ARH SEPP. On 19 July 2017, under the provisions of Clause 37 of Division 5 of the ARH SEPP a Site Compatibility Certificate (SCC) was issued by the Department of Planning and Environment, which certified that the development described as *"Residential flat development with a minimum of 50% of all residential product being made available for affordable rental housing for a minimum of 10 years"* is *"compatible with the surrounding land uses, having regard to the matters set out in Clause 37(6)(b)"*.

#### IN1 General Industrial

##### 1 Objectives of zone

- To provide a wide range of industrial and warehouse land uses.
- To encourage employment opportunities.
- To minimise any adverse effect of industry on other land uses.
- To support and protect industrial land for industrial uses.
- To facilitate a range of non-industrial land uses that serve the needs of workers and visitors.

##### 2 Permitted without consent

Nil

##### 3 Permitted with consent

Building identification signs; Business identification signs; Depots; Food and drink premises; Freight transport facilities; Garden centres; General industries; Hardware and building supplies; Horticulture; Industrial training facilities; Kiosks; Landscaping material supplies; Light industries; Liquid fuel depots; Neighbourhood shops; Oyster aquaculture; Places of public worship; Plant nurseries; Roads; Rural supplies; Tank-based aquaculture; Timber yards; Vehicle sales or hire premises; Warehouse or distribution centres; Any other development not specified in item 2 or 4

##### 4 Prohibited

Agriculture; Air transport facilities; Airstrips; Amusement centres; Boat launching ramps; Boat sheds; Camping grounds; Caravan parks; Cemeteries; Charter and tourism boating facilities; Commercial premises; Community



facilities; Crematoria; Eco-tourist facilities; Educational establishments; Entertainment facilities; Exhibition homes; Exhibition villages; Farm buildings; Forestry; Function centres; Heavy industrial storage establishments; Helipads; Highway service centres; Home-based child care; Home businesses; Home occupations; Home occupations (sex services); Industries; Information and education facilities; Jetties; Marinas; Mooring pens; Moorings; Open cut mining; Pond-based aquaculture Port facilities; Recreation facilities (major); Registered clubs; Residential accommodation; Rural industries; Signage; Tourist and visitor accommodation; Water recreation structures; Water supply systems; Wharf or boating facilities

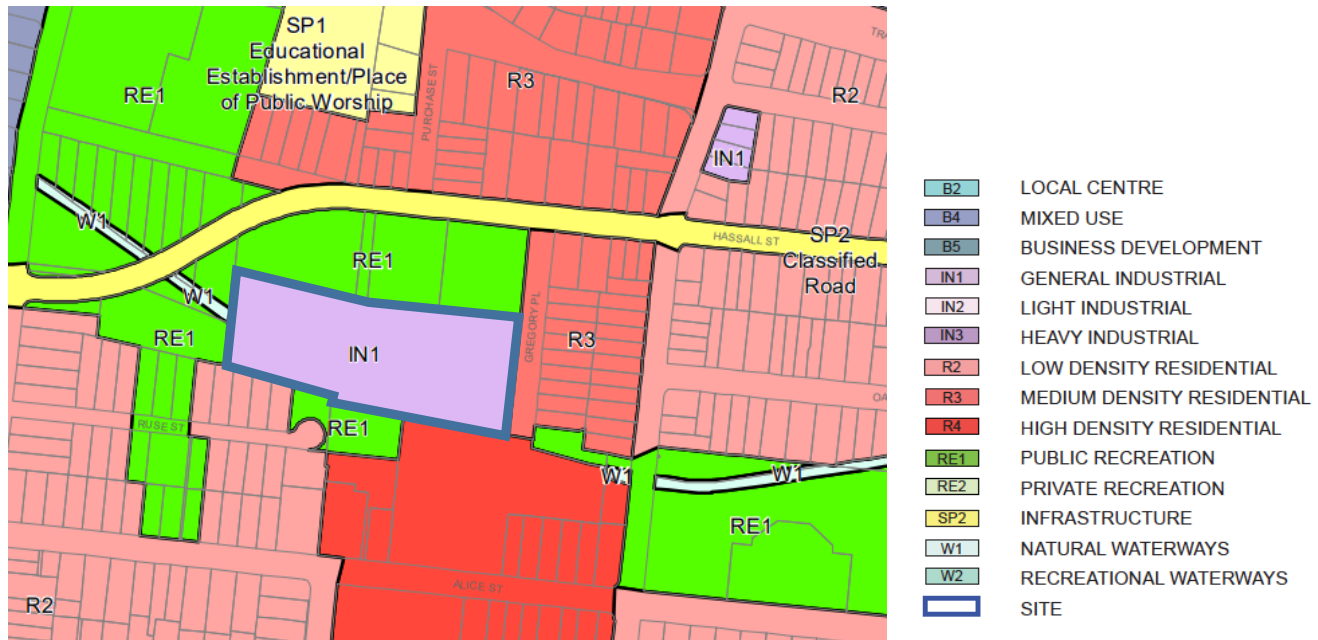


Figure 13: Parramatta LEP Land Zoning Map

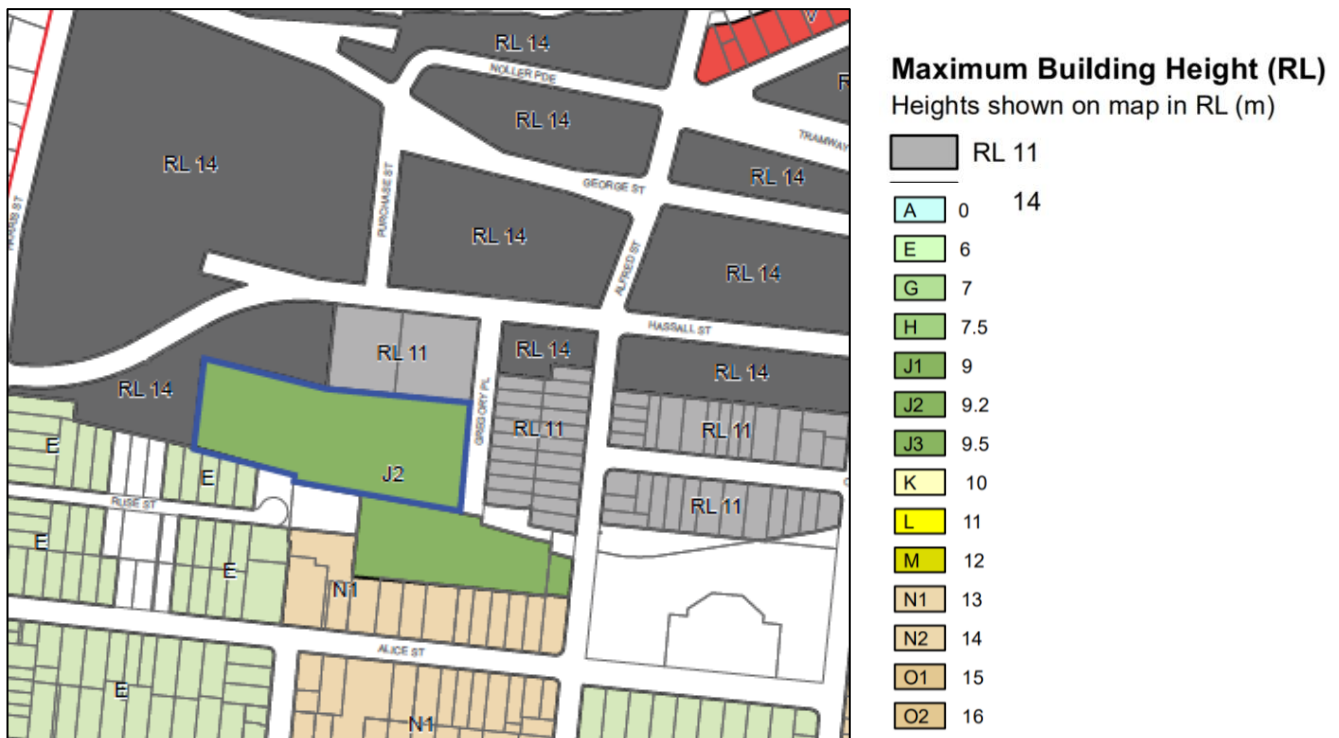
#### 4.4.2 Height of Buildings

The maximum building height for the subject site is 9.2 metres ("J2"), which is equivalent to approximately 2 to 3 storeys. Figure 14 illustrates the existing maximum building height for the site.

Land to the north and east have a maximum building height of 11-14 metres (RL), which is related to the historical heritage views from Elizabeth Farm and Experiment Farm. Sites to the south have maximum building heights ranging from 6 to 13 metres on an elevated topography on top of the remnant clay cliff. There are sites along the foreshore to the north east of the site that have maximum building heights ranging from 37 to 40 metres, departing from the 14 metre heritage view maximum building height limit.

Our Lady of Lebanon Church (OLOL) is located to the south of the site, south of the stormwater channel on top of the remnant clay cliff. On the site, the height of the clay cliff is equal to the height of an 8 storey residential building. The statue at the top of the OLOL has an RL of 44.50 and the site has an RL of 4.50 - 5.30.

Residential sites to the south range from single storey detached dwellings to 8 storey residential buildings. These buildings are located on top of the remnant clay cliff along Alice Street, which are approximately 8 storeys higher than the subject site.



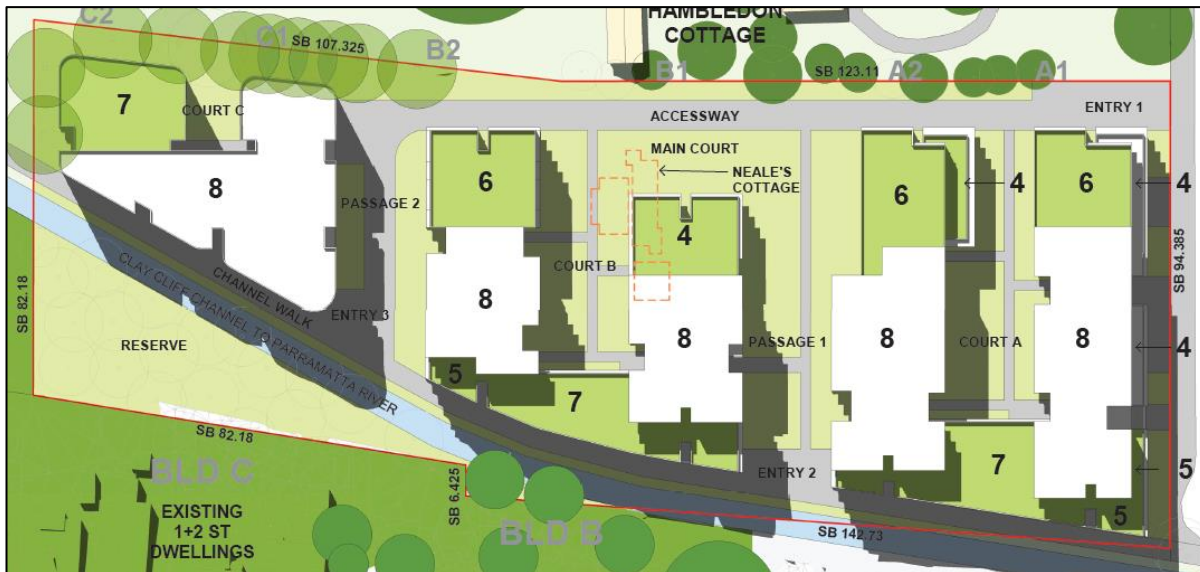
**Figure 14:** Maximum Height of Building Map

The ARH SEPP provides for incentives by way of expanded zoning permissibility, floor space ratio bonuses and non-discretionary development standards. To determine the appropriate height of buildings, Schedule 2 of the SCC provided for conditions which required consultation with the Heritage Council of NSW to determine the “*bulk and scale, and design principles to protect surrounding heritage items*”.

The proposed maximum building heights have been settled through the consultation process with the Heritage Council of NSW in their support for the progression of the scheme to a Stage 1 Development Application (see advice at Attachment 10).

The building height has been distributed across the site to adjust to the surrounding context, including the remaining colonial cottages. The built form varies in height from 4-8 storeys and adjust to the scale of the existing and future context. Immediately behind Hambledon Cottage, the built form has been reduced in height and increases to the south along the stormwater channel. Roof terraces are integrated on the lower forms to provide additional communal open space and mitigate the impacts of built form on the site.

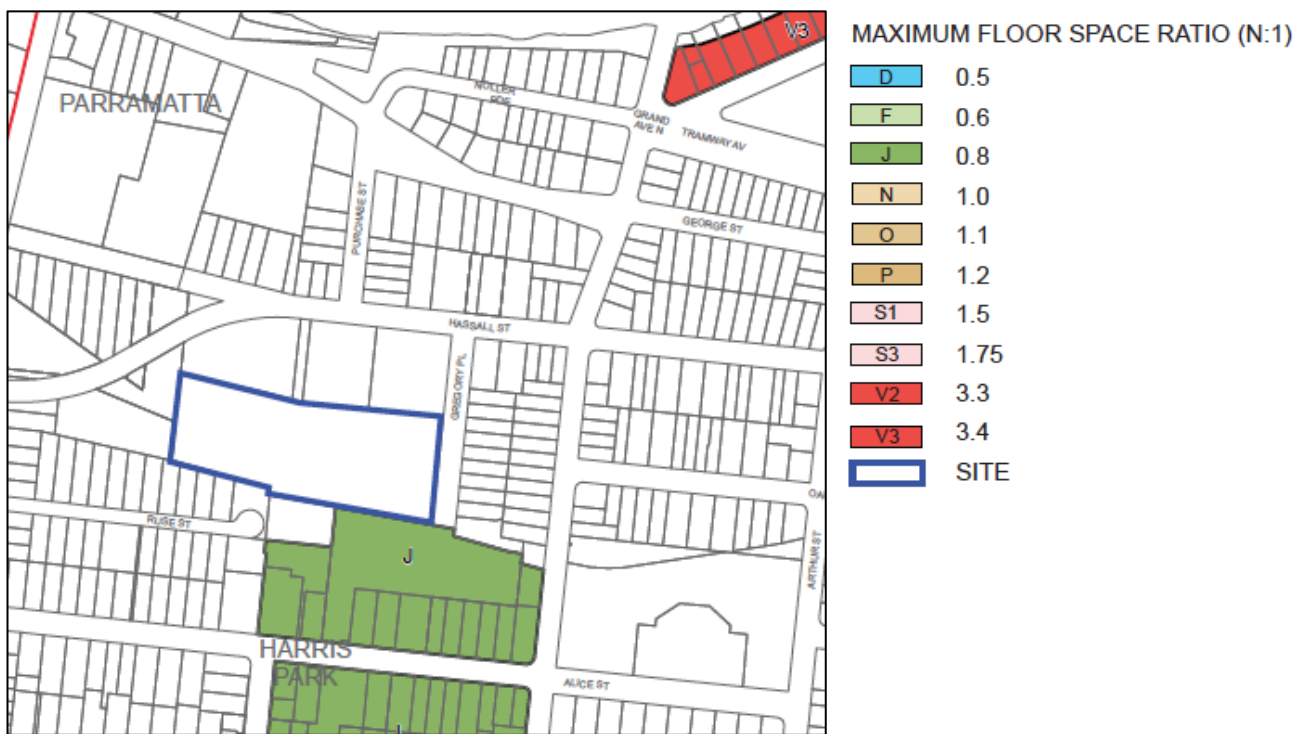
Along Gregory Place, the built form has been setback above level 4, at the height of the existing and future tree canopy and to adjust to the low-rise existing buildings along Gregory Place. The proposed building heights will be taller than those that currently exist on Gregory Place, but they do not need to be the same to be compatible.



**Figure 15:** Indicative maximum building heights across the development

#### 4.4.3 Floor Space Ratio

The maximum floor space ratio (FSR) control does not apply to the site. Figure 16 below shows the maximum FSR map.



**Figure 16:** Maximum Floor Space Ratio Map

The ARH SEPP provides for incentives by way of expanded zoning permissibility, floor space ratio bonuses and non-discretionary development standards. To determine the appropriate density for the development, Schedule 2 of the SCC provided for conditions which required consultation with the Heritage Council of NSW to determine the “bulk and scale, and design principles to protect surrounding heritage items”.



The bulk and scale of the development was defined by its setbacks, building height and landscaped area to ensure the development retains compatibility within its context, as per the requirements of the SCC.

The architectural design concept is for 3 x freestanding building forms that are arranged into an orthogonal layout of five fingers that vary in height from 4-8 storeys and adjust to the scale of the existing and future context, including remaining colonial cottages. The built form has been embedded within a parkland setting of courts and passages that creates a framework for permeable pedestrian movement to enable physical and visual connections to the rich cultural landscape setting.

The concept, therefore, provides for a density of 2.5:1 (41,105m<sup>2</sup> GFA) on a site area of 19,480msq.m. This is simply a numerical calculation based on the built form layout and performance criteria associated with the development concept.

#### 4.4.4 Heritage

The Site is not identified as a heritage item and is not within a conservation area. However, there are a number of heritage items and heritage conservation areas surrounding the site of state and local significance:

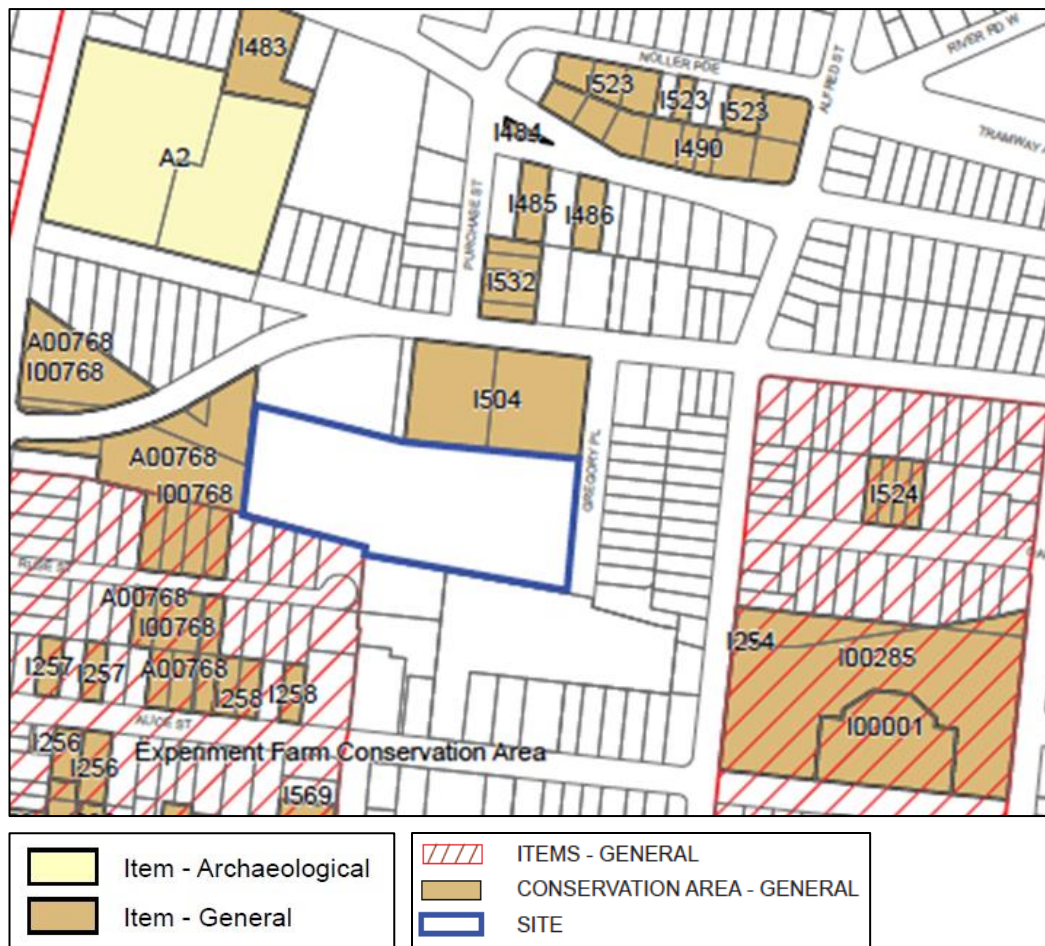


Figure 17: Parramatta LEP 2011 Heritage Map

#### State significance:

- 100001 - Elizabeth Farm House
- 100285 - Public reserve associated with Elizabeth Farm
- A00768 - Experiment Farm archaeological site

I00768 - Experiment Farm Cottage and environ

I504 - Hambledon Cottage and all trees (we understand PLEP has yet to be updated to reflect this).

Local significance:

I532 - Timber cottages

I254 - Boundary Stone

Conservation areas:

Elizabeth Farm Conservation Area

Experiment Farm Conservation Area

Harris Park West Conservation Area

#### 4.4.5 Acid Sulfate Soils

The site has two acid sulfate soil classifications, generally divided by the stormwater channel. The north of the site is Class 4, which means that the water table is likely to be lowered more than 2 meters below the natural ground surface. The south of the site is Class 5 which means applies to works within 500 metres of the adjacent Class 1, 2, 3, or 4 land that is below 5 metres Australian Height Datum and by which the water table is likely to be lowered below 1 metre Australian Height Datum on adjacent Class 1, 2, 3, or 4 land.

While the application is for a concept for the site and does not seek 'works', it does include a basement in the location of land classified as Class 4. Therefore, additional information and investigation will be provided with the EIS.



**Figure 18:** Acid Sulfate Soils Map

#### 4.4.6 Additional LEP Provisions

A number of additional LEP Provisions within the Parramatta LEP 2011 are relevant to the proposal. Consideration is given to relevant provisions below, with further consideration to occur during the preparation and assessment of the EIS process.

Assessment Criteria	Comment	Compliance
Clause 5.10 Heritage Conservation	The site does not fall within a heritage conservation zone and does not contain any items of heritage significance. However, the concept has been developed in consultation with the Heritage Council of NSW given the surrounding heritage context and sensitivities associated with the location of the site. This is considered in detail in the supporting documents and will be further fleshed out through the EIS process.	Yes
Clause 5.21 Flood Planning	<p>The site has mainstream flood liability due to its proximity to Clay Cliff Creek but is also impacted by the larger Parramatta River system for extreme events (specifically in the Probable Maximum Flood). GRC Hydro have carried out assessment of design flood behaviour at the site. The assessment included establishment of hydrologic (WBNM) and hydraulic models (TUFLOW). The SEARs request is accompanied by a letter from GRC Hydro, providing a high level outline of their findings of and further assessment required as part of the EIS. This is included at Attachment 4. The following is noted:</p> <ul style="list-style-type: none"> <li>• <i>There is minimal flooding at the site in the 5% AEP, with flow outside of the channel limited to the upstream (western) end where depths of around 0.1-0.2 m occur.</i></li> <li>• <i>In the 1% AEP, out-of-bank flow occurs, with some areas outside the existing building extent impacted by depths ranging from zero to up to a metre in specific locations.</i></li> <li>• <i>The modelling determined a maximum 1% AEP design flood level for the site of 5.40 mAHD (based on the upstream end).</i></li> <li>• <i>The effect of the development on flooding in surrounding areas is required to be assessed. Development of the site shall ensure there is no increase in flooding on adjacent properties in the design event (1% AEP).</i></li> <li>• <i>The most suitable evacuation strategy for the site is shelter-in-place.</i></li> </ul>	To be further addressed by the EIS
Clause 6.1 Acid Sulfate Soils	The site has two acid sulfate soil classifications, generally divided by the stormwater channel. The north of the site is Class 4, which means that the water table is likely to be lowered more than 2 meters below the natural ground surface. The south of the site is Class 5 which means applies to works within 500 metres of the adjacent Class 1, 2, 3, or 4 land that is below 5 metres Australian Height Datum and by which the water table is likely to be lowered below 1 metre Australian Height Datum on adjacent Class 1, 2, 3, or 4 land.	To be further addressed by the EIS

	While the application is for a concept for the site and does not seek 'works', it does include a basement in the location of land classified as Class 4. Therefore, additional information and investigation will be provided with the EIS.	
Clause 6.2 Earthworks	The concept proposal does not seek consent for earthworks. Any earthworks required to facilitate future build form and development of the site will be addressed at a later stage.	N/A
Clause 6.4 Biodiversity Protection	The site contains an industrial land use and an approval through a SCC for residential land uses. The site is not identified as containing any biodiversity value under the <i>LEP Natural Resources Biodiversity Map</i> . Therefore, this clause does not apply to the proposal. However, potential biodiversity will be considered following the issue of the SEARs to determine whether a BDAR waiver will be required.	N/A
Clause 6.5 Water Protection	The site is not mapped on the <i>Natural Resources – Riparian Land and Waterways Map</i> under the Parramatta LEP 2011. However, the site does adjoin and incorporate part of Clay Cliff Creek. The relationship to the creek and its historical context in the narrative of the project is relevant and will be further addressed and considered in the design, function and evolution of the development.	N/A
Clause 6.7 Foreshore Building Line	The site is not mapped on the <i>Foreshore Building Line Map</i> under the Parramatta LEP 2011.	N/A
Clause 6.12 Design Excellence	The site is not identified on the <i>Design Excellence Map</i> or the <i>Key Sites Map</i> under the Parramatta LEP 2011. However, the provisions for design excellence are integral to achieving a high quality outcome on the site and achieve the principles for design excellence. Further information on design excellence is included in the attached Concept Design Report at Attachment 3.	N/A
Clause 6.13 Design Excellence - Generally	The site is not identified as land "A" on the <i>Design Excellence Map</i> under the Parramatta LEP 2011. However, the provisions for design excellence are integral to achieving a high quality outcome on the site and achieve the principles for design excellence. Further information on design excellence is included in the attached Concept Design Report at Attachment 3.	N/A
Part 7 Additional local provisions – Parramatta City Centre	The site is not located within the Parramatta City Centre	N/A

**Table 5:** Additional LEP Provisions

## 5 Environmental Impacts

This section identifies the key items of environmental impact and assessment that are to be addressed through the EIS and Part 4 process.

### 5.1 Need for Housing

The project is for a build-to-rent residential development, incorporating 50% affordable housing. This will have significant benefit to an area with very high unaffordability amongst the community, with significant rates of people in housing stress.

Council recognises the housing stress many people in this area and the LGA are in through its strategic planning documents including the recently adopted Local Strategic Planning Statement (LSPS). The following is noted and extracted from Council's LSPS:

*"In 2016, in the City of Parramatta, 13.1% of households were experiencing housing stress, 24% of households experiencing rental stress and 12.0% of households experiencing mortgage stress. Furthermore, rates of homelessness increased between 2011 and 2016 and homelessness rates are increasing still (source: Profile. id and Parramatta Street Council).*

*Council's Local Housing Strategy (to be endorsed by Council and DPIE), provides the narrative for Council to:*

- develop an Affordable Housing Target Scheme under State Environmental Planning Policy 70 – Affordable Housing (Revised Schemes).*
- seek higher affordable housing rates (to the District Plan's rate of 5-10%, if viable).*
- seek partnerships with Land and Housing Corporation and Community Housing Providers to deliver further affordable housing.*
- consider funding for affordable housing from voluntary planning agreements in locations where an Affordable Housing Target Scheme does not apply.*
- including a suitable component of affordable housing (such as communal boarding houses, group homes, and/or seniors housing within Housing Diversity Precincts for any additional planned housing outside of existing Growth Precincts).*
- identify suitable areas for 'Incentivised Inclusionary Housing' where height controls can be higher than that which would normally correlate with the planned FSR to facilitate take-up on FSR incentive bonuses under the ARHSEPP.*

*Furthermore, Council's Affordable Rental Housing Policy 2019 aims to increase the provision of affordable rental housing across the City."*

Pacific Community Housing as registered under the National Regulation as a Community Housing Provider is required to advance a Social Impact Statement (SIS) with every DA application progressed and a SIS will accompany the EIS in the future application.

### 5.2 Solar Access and Overshadowing

The building layout and concept design has been carefully designed to maximise solar access to residential apartments and open space associated with the design of the development and project, while minimising any adverse impacts associated with the overshadowing of adjoining development.

The site has a favourable northern exposure, with no overshadowing impacts from development to the north. The only potential overshadowing from the north is mature trees from the Hambledon Cottage grounds. This provides excellent opportunities for solar access to communal and private open spaces and performance of buildings to achieve direct sunlight.

The EIS will be supported by detailed overshadowing analysis based on the proposed built form and layout.

### 5.3 Flooding, Drainage and Stormwater Management

The site has mainstream flood liability due to its proximity to Clay Cliff Creek but is also impacted by the larger Parramatta River system for extreme events (specifically in the Probable Maximum Flood).

GRC Hydro have carried out assessment of design flood behaviour at the site. The assessment included establishment of hydrologic (WBNM) and hydraulic models (TUFLOW). The SEARs request is accompanied by a letter from GRC Hydro, providing a high level outline of their findings of and further assessment required as part of the EIS. This is included at Attachment 4. The following is noted:

- *There is minimal flooding at the site in the 5% AEP, with flow outside of the channel limited to the upstream (western) end where depths of around 0.1-0.2 m occur.*
- *In the 1% AEP, out-of-bank flow occurs, with some areas outside the existing building extent impacted by depths ranging from zero to up to a metre in specific locations.*
- *The modelling determined a maximum 1% AEP design flood level for the site of 5.40 mAHD (based on the upstream end).*
- *The effect of the development on flooding in surrounding areas is required to be assessed. Development of the site shall ensure there is no increase in flooding on adjacent properties in the design event (1% AEP).*
- *The most suitable evacuation strategy for the site is shelter-in-place.*

### 5.4 Traffic and Parking

The project has experienced previous analysis of traffic impacts associated with a number of development scenarios associated with the site. Traffic Solutions Pty Ltd previously provided study for the site including SIDRA modelling of the intersection of Hassall Street and Gregory Place for development scenarios ranging from 750 apartments to 2500 apartments.

The study at that time concluded that the intersection operated at a satisfactory level of service under existing conditions; that at 750 apartments the network would be approaching capacity under the current road configuration and at 2500 apartments the network would be at capacity if vehicular movements were limited to left in and left out of Gregory Place.

It is noted that the proposed dwelling yield, at 483 dwellings, is below all scenarios previously modelled and that the network can support this proposal.

However, a detailed report will be prepared and accompany the EIS lodgement package. This will be informed by more recent traffic count data (undertaken in June 2021 pre-covid lockdown). Traffic Solutions Pty Ltd have prepared a supporting letter to confirm this additional work including *“a detailed Traffic Impact Assessment Report that will include a detailed SIDRA Modelling of the intersection of Hassall Street and Gregory Place and any required mitigation to the road network to support the development traffic plus background traffic growth to 2031”*.



The Traffic Solutions letter is included at Attachment 13 to this report.

## 5.5 Amenity Impacts

A number of reports will be prepared in support of the application that will consider in detail potential amenity impacts within the proposed development and on adjoining properties. It is noted that at this stage the application is simply for a concept. Relevant to the application, the following report(s) is proposed:

### Crime Prevention through Environmental Design

An assessment that considers building layout, passive surveillance, safety of open space, pedestrian movement and mitigation to minimise potential crime risks.

## 5.6 Waste Management

The proposal is likely to generate waste during the construction and operation phases. A Waste Management Plan will need to be undertaken to determine the type, quantity, onsite storage and methods of disposal. Measures to minimise impacts will be documented in the EIS.

An operational waste management plan will also be essential to the submission of the EIS. Operational waste storage and removal associated with the future development will need located and collected from the basement. The application is for a Concept for the site, however a high level report will be prepared to accompany the application as far as relevant for the consideration of a concept.

## 5.7 Economic

The proposal is likely to have significant positive economic impacts on the local community.

The positive impacts of development include the creation of jobs associated with construction and management of the affordable housing dwellings and build-to-rent dwellings proposed within the development. A detailed economic report will be included with the EIS submission.