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URBIS

27-31 ARGYLE STREET

Request for Industry Specific
SEARs

Prepared for
PM2 ARGYLE PTY LTD
18 September 2024



Title: Sacred River Dreaming
Artist: Hayley Pigram
Darug Nation
Sydney, NSW

Urbis acknowledges the important contribution that Aboriginal and Torres Strait Islander people make in creating a strong and vibrant Australian society.

We acknowledge, in each of our offices, the Traditional Owners on whose land we stand.

We also acknowledge the Gandangara people and their ongoing connection to culture, lands and waters and their valuable contribution to the community and lands on which this development is proposed.

We recognise that First Nations sovereignty was never ceded and respect First Nations peoples continuing connection to these lands, waterways and ecosystems for over 60,000 years.

We pay our respects to First Nations Elders, past and present.

URBIS STAFF RESPONSIBLE FOR THIS REPORT WERE:

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Version	Date of issue	Prepared By	Reviewed By	Authorised By
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CONTENTS

1.	Introduction	1
1.1.	Applicant Details	1
1.2.	Project Overview	3
1.3.	Statutory Planning Overview and Legal Opinion	3
2.	Site and Strategic Context	5
2.1.	The Site	5
2.2.	Surrounding context	6
2.3.	Development History	7
2.3.1.	Site specific Development Control Plan	7
2.4.	Cumulative Impacts with Future Projects	9
2.5.	Strategic Planning Justification	9
3.	Project Description	12
3.1.	Summary of the proposed development	12
3.2.	Feasible Alternatives	15
4.	Statutory Context	16
4.1.	SSD qualification	16
4.2.	Statutory Requirements	16
4.3.	Pre-Conditions	17
4.4.	Mandatory Considerations	21
5.	Engagement	26
5.1.	Engagement carried out	26
5.2.	Engagement to be undertaken	26
6.	Proposed Assessment of Impacts	27
6.1.	Matters Requiring Further Assessment in the EIS	27
6.2.	Matters Requiring No Further Assessment in the EIS	30
7.	Conclusion	31
	Disclaimer	32

Appendix A	Estimated Development Cost (EDC) estimate
Appendix B	Reference Architectural Plans

FIGURES

Figure 1 Aerial image of site	5
Figure 2 Site Photos	6
Figure 3 Proposed Commercial Envelope	8
Figure 4 Proposed Building Envelope – Site Plan	13
Figure 5 Proposed Building Envelope – 3D Perspective	14
Figure 6 Land Zoning Map	17

TABLES

Table 1 Applicant Details	1
Table 2 Site and Project Overview	3
Table 3 Nearby SSD Projects	9
Table 4 Strategic Planning Alignment	10
Table 5 Summary table	12

Table 6 Summary of reference scheme dwelling mix..... 12

Table 7 Analysis of Feasible Alternatives..... 15

Table 8 Statutory Requirements 16

Table 9 Pre-Conditions 17

Table 10 Pre-Conditions under Parramatta Local Environmental Plan 2023..... 19

Table 11 Mandatory Considerations..... 21

Table 12 Matters requiring assessment in the EIS..... 27

1. INTRODUCTION

This Scoping Report has been prepared by Urbis Ltd on behalf of PM2 Argyle Pty Ltd (**the Applicant**) in support of a Build-to-Rent (**BTR**) mixed use development at 27-31 Argyle Street, Parramatta (**'the site'**).

This Scoping Report requests Industry-specific Secretary's Environmental Assessment Requirements (**SEARs**) to guide the preparation of an Environmental Impact Statement (**EIS**) that will accompany a State Significant Development Application (**SSDA**).

The development comprises:

- Demolition of the existing commercial building on the site.
- Construction of a mixed-use building comprising BTR accommodation and commercial floorspace. The detailed design and appearance of the development (including its height, scale and massing) will be determined through a competitive design process.
- The provision of car parking above ground level.
- Site landscaping both within the development and along the street frontages along Argyle Street and O'Connell Street.

The proposal is classified as State Significant Development pursuant to Section 27 of Schedule 1 of the Planning Systems SEPP as the proposal is permitted under Chapter 3, Part 4 of the *State Environmental Planning Policy (Housing) 2021* (**Housing SEPP**) and:

- Is located within the Central River City Region and has an estimated development cost of more than \$50 million.
- The tenanted component of the proposed development will have a value of at least 60% of the estimated development cost of the proposed development (**Appendix A**)
- The proposal does not involve development that is prohibited under an environmental planning instrument applying to the land.

Accordingly, an SSDA will be required to be lodged to the Department of Planning, Housing and Infrastructure (**DPHI**).

The purpose of this report is to:

- Describe the project in simple terms,
- Analyse the feasible alternatives considered and identify the alternatives that will be investigated further in the EIS,
- Indicate early community views on the project and identify what engagement will be carried out during the preparation of the EIS, and
- Identify the key matters requiring further assessment in the EIS and the proposed approach to assessing each of these matters.

Reference plans prepared by PTW are enclosed with this Scoping Report (**Appendix B**). The reference plans will inform a design competition and demonstrate one way in which development may be delivered on the site consistent with the applicable development standards.

1.1. APPLICANT DETAILS

The Applicant details for the proposed development are listed in the table below.

Table 1 Applicant Details

Descriptor	Applicant Details
Applicant Name	PM2 Argyle Pty Ltd

Postal Address	Level 6, 845 Pacific Highway, Chatswood, Sydney, NSW, 2067
ABN	40 614 041 057
Nominated Contact	Angelo Lo
Contact Details	angelo.lo@hyg.com.au

1.2. PROJECT OVERVIEW

Table 2 Site and Project Overview

Matter	Description
The Site	The site is located at the junction of Argyle Street and O'Connell Street within the Parramatta Central Business District (CBD). It is bounded by a commercial building to the east, Argyle Street to the north (with a railway corridor beyond) and O'Connell Street to the west. A multi-storey car park structure is located immediately south of the site.
Country	Dharug
Street Address	27 – 31 Argyle Street, Parramatta
Legal Description	Lot 131 in Deposited Plan 1055406
Site Area	2,525m ²
LGA	City of Parramatta
Existing development	The existing development on the site comprises an 11-storey commercial office premises with Services NSW occupying the ground floor tenancy
Project Objectives	▪ Revitalise a highly sustainable and well-located site within the Parramatta CBD. ▪ Deliver BTR accommodation that will address a critical requirement for additional housing in Parramatta and the wider Western Sydney area, and help address local dwelling targets ▪ Provide high quality residential accommodation for future residents ▪ Provide contemporary commercial office floorspace that will activate and enhance the vitality of the site and this part of the Parramatta CBD
Proposed Development	▪ Redevelopment of the site including the demolition of the existing building, construction of a mixed-use building comprising BTR accommodation and commercial office and retail premises with associated parking and landscaping, and augmentation of utility infrastructure

1.3. STATUTORY PLANNING OVERVIEW AND LEGAL OPINION

The SSDA seeks the following floor space incentives under the *Parramatta Local Environmental Plan 2023 (PLEP 2023)*:

- Additional floor space ratio – “Area 3” and “Area 5” incentive of 4:1 for commercial office development under Part 7 Division 2 Clause 7.5
- Design excellence – “additional building height and floor space ratio” incentive of 15% under Part 7 Division 3 clause 7.15 of the PLEP 2023, and
- High performing building design – “high performing building design” incentive of 5% under Clause 7.25 of the PLEP 2023.

Clause 7.6(1) of the PLEP 2023 states that:

“Development consent must not be granted to development to which Clause 7.5 applies unless a site-specific Development Control Plan (DCP) has been prepared for the land.”

However, Clause 2.10(2) of the *State Environmental Planning Policy (Planning Systems) 2021 (Planning Systems SEPP)* states that

“A requirement of an environmental planning instrument that a development control plan be prepared before development consent can be granted to development does not apply to:

- a) State Significant Development”.*

As detailed elsewhere in this document, the request for industry-specific SEARs is supported by legal opinion from Mills Oakley in relation to this matter. The legal opinion confirms that a proposal subject to a SSDA can utilise the floorspace incentives available under Clause 7.5 of the PLEP 2023 without a preceding site-specific DCP (or Concept Development Application).

Prior to the submission of the SSDA, a design competition will be held in accordance with the PLEP Design Excellence provisions and Government Architect for New South Wales (GANSW) requirements.

2. SITE AND STRATEGIC CONTEXT

2.1. THE SITE

The site is located at 27-31 Argyle Street, Parramatta and is legally described as Lot 131 in Deposited Plan 1055406. The site has an area of 2,525m² with a frontage of approximately 60 metres along Argyle Street, 23 metres along O'Connell Street and a maximum depth of 43m. The site has a direct interface to both Argyle Street to the north and O'Connell Street to the west.

The site is irregular in shape and is shown in Figure 1 below.

Figure 1 Aerial image of site



Source: Urbis

The existing development on the site comprises an 11-storey commercial office premises which comprises approximately 10,399sqm of GFA. Services NSW occupy the ground floor tenancy fronting Argyle Street. Vehicular access to the site is provided via Argyle Street with a secondary entry to the loading dock off O'Connell Street.

The site is located approximately 100m west of Westfield Parramatta Shopping Centre, 350m south west of Parramatta Square, and 450m west of Parramatta railway station. Accordingly, the site presents a significant opportunity for redevelopment in a highly sustainable location.

Figure 2 Site Photos



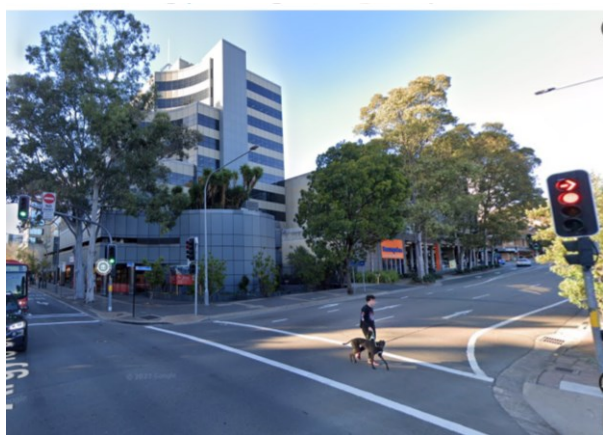
Picture 1 View of site looking west from Argyle Street.

Source: Google Maps (2024)



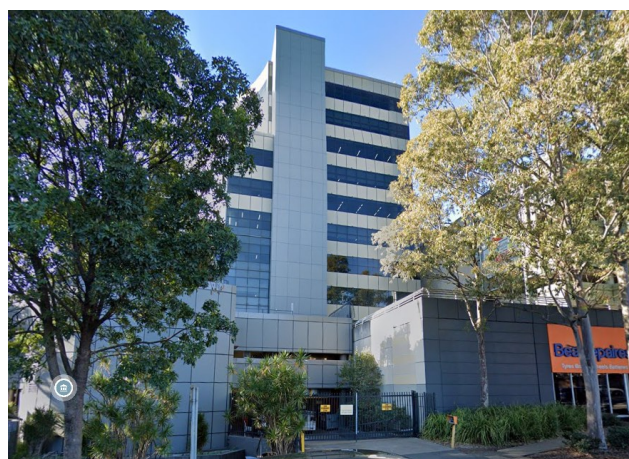
Picture 2 View of site from Argyle Street

Source: Google Maps (2024)



Picture 3 View looking east from Argyle Street.

Source: Google Maps (2024)



Picture 4 View of site from O'Connell Street

Source: Google Maps (2024)

2.2. SURROUNDING CONTEXT

The site is located with the commercial core of the Parramatta Central Business District (CBD). A railway corridor is situated to the north of Argyle Street. The railway line runs through the central core of the CBD and connects to Parramatta Station to the west. The site is located within one of three areas in Parramatta to the south of the railway corridor that is zoned as a commercial core land use.

The site forms part the south western portion of the Parramatta CBD which is largely defined by the Westfield Parramatta precinct. To the immediate east the site is bounded by a commercial office building premises ('33 Argyle Street') with 3 levels of above ground parking. A Concept SSDA for the redevelopment of 33 Argyle Street for a mixed-use tower comprising BTR accommodation, commercial office and retail uses was lodged in June 2024. The Concept SSDA seeks approval for a building envelope with an indicative height of 60 storeys.

Further east the built form includes an existing commercial building located at 128 Marsden Street with Westfield shopping centre and Parramatta bus interchange beyond. The southern boundary of the site has a direct interface with the Westfield car park par, which extends across six levels up to the boundary line except at the south eastern corner of the site. The roof level of the car park is currently open and contains roof top parking.

At its south eastern corner, the site is bounded by a car repairs garage at ground floor level. The garage is single (double-height) storey and has parking on its roof.

To the west, the site is bounded by the junction of Argyle Street and O'Connell Street. Both Argyle Street and O'Connell Street are classified State Roads. St John's Cemetery adjoins O'Connell Street to the west and is a state listed heritage item. Three-storey commercial buildings are located along the Argyle Street frontage.

The area north of the railway line includes a large residential tower but is predominately characterised by commercial uses, government offices and civic institutions within the Justice Precinct.

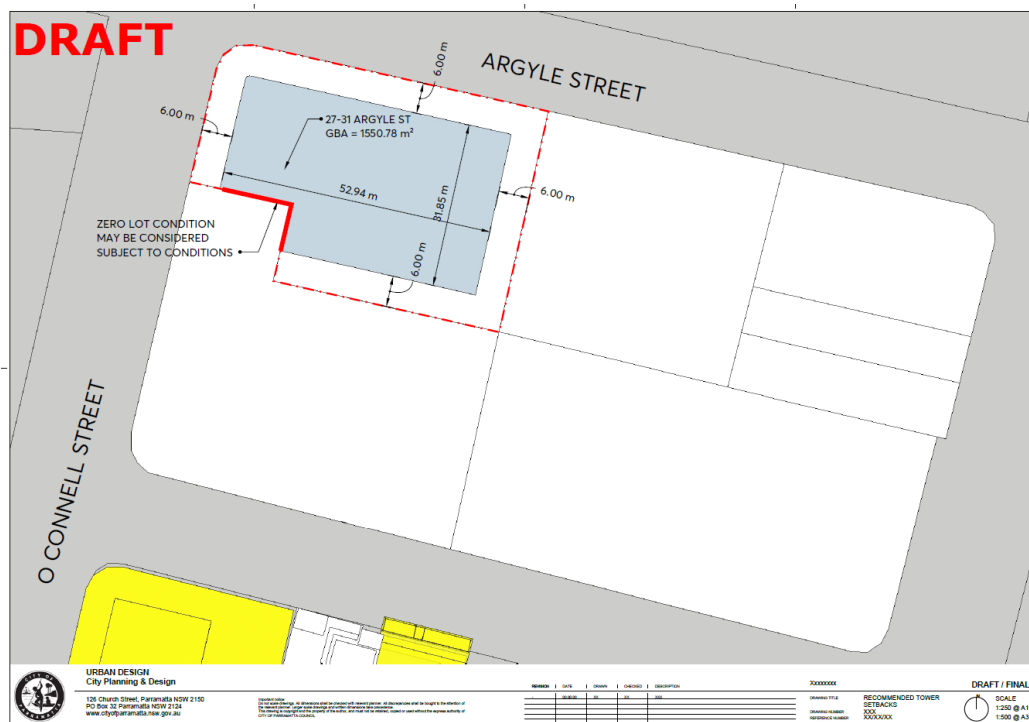
2.3. DEVELOPMENT HISTORY

2.3.1. Site specific Development Control Plan

The Applicant has engaged extensively with Council in relation to the development of this site. This engagement occurred prior to the finalisation of the PLEP controls for the Parramatta City Centre in 2022.

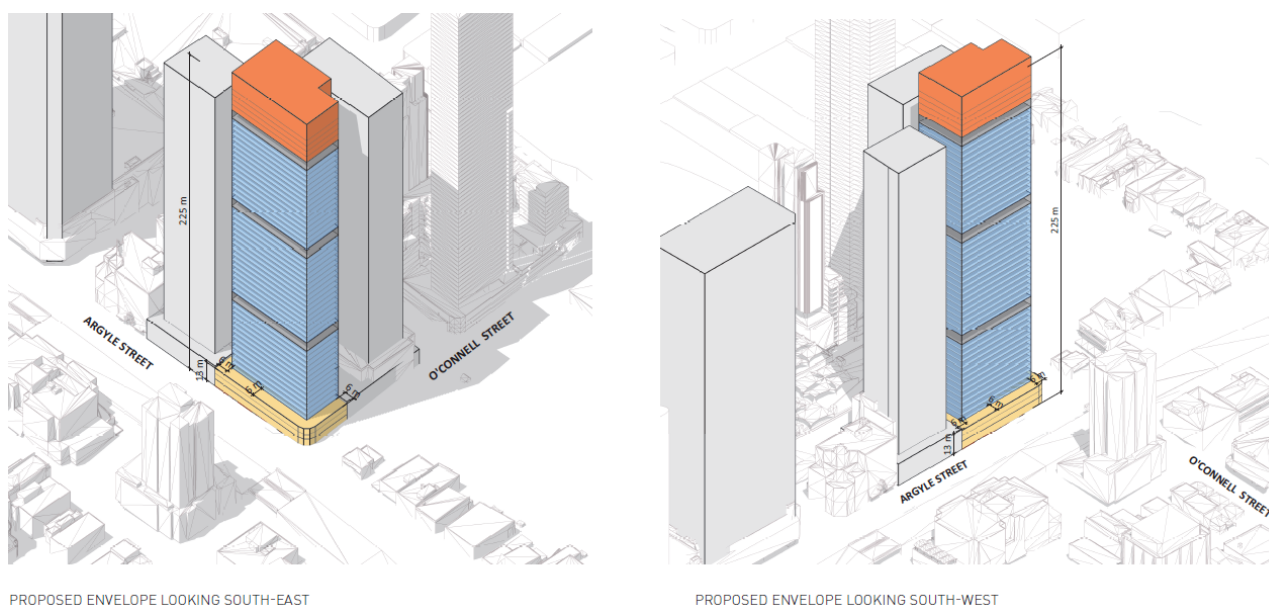
This engagement related to progressing a commercial office development in accordance with the anticipated development controls for the site which included no maximum FSR for commercial office development on the site. In anticipation of these controls, a reference design was prepared in accordance with Council's preferred envelope (refer Figure 3). This envelope and reference design were to inform a site-specific Development Control Plan which was submitted for Council's consideration in 2021. It is important to note that this provision (inclusive of a 15% height bonus for design excellence) would have resulted in approximately 69,000sqm of commercial office GFA.

Figure 3 Proposed Commercial Envelope



Picture 5 Council Officer Preferred Envelope (Commercial Scheme) and block modelling

Source: Parramatta Council



Picture 6 PTW

In June 2022 the Parramatta LEP was finalised following independent urban design advice provided to DPHI. The finalised controls removed the draft provision relating to no maximum FSR for commercial office development. This change resulted in a reduction of approximately 40,000sqm of GFA (58% reduction).

In December 2022, subsequent amendments were made to the PLEP via a SEPP amendment which included additional incentive FSR of 4:1 for commercial office development.

Despite the availability incentive FSR the achievable GFA was still well below what could have been achieved under the draft LEP controls. As such the Applicant considered other development options which

included both BTR and more recently the bonuses available under the in-fill affordable housing of the Housing SEPP.

As detailed further within Section 3 of this report, a mixed-use development comprising BTR accommodation and office premises is now proposed on the site.

2.4. CUMULATIVE IMPACTS WITH FUTURE PROJECTS

An assessment of the cumulative impacts of the proposed development with other relevant future projects will be undertaken as part of the EIS. Relevant future projects to be considered in the cumulative impact assessment are set out in **Table 3**.

Table 3 Nearby SSD Projects

DA Reference	Development Description	Current Status
SSD-66711218	A concept development application has been submitted for approval on the adjoining site at 33 Argyle Street. The application comprises an SSDA and seeks approval for a 62-storey mixed-used development consisting of BTR, commercial office and retail uses.	The public exhibition period ended on 22 nd August 2024 and the application is currently pending determination.
SSD-35609161	Construction of a 61-storey mixed use building at 12 Hassall St Parramatta, known as GQ Parramatta. The development includes 5 basement car parking levels, a four storey podium incorporating commercial floorspace and resident amenities, and 391 BTR apartments at levels 5 – 59.	Approved 2 nd March 2023
SSD-34919690	Construction and operation of a 34 storey mixed use building comprising of 204 build to rent units, 3 storey retail and commercial podium, excavation for 3 levels of basement car parking for 84 car spaces, rooftop terrace and communal open spaces. The application relates to the site at 3943 Hassall Street, Parramatta.	Approved 5 April 2024
SSD-49808717	Concept proposal for a mixed-use BTR development comprising 316 units, commercial office and retail space with an approx. height of 48 storeys, access from Fitzwilliam Street to basement car parking and pedestrian link. The application relates to the site at Fitzwilliam and Argyle Streets, Parramatta.	Approved 26 April 2024

2.5. STRATEGIC PLANNING JUSTIFICATION

The proposed development is consistent with strategic planning policy priorities and actions for these reasons

- The proposal will provide a high-quality BTR and commercial office development that will complement the evolving character of the Parramatta CBD and enhance the residential offering close to Parramatta station. The use is aligned with broader State, regional and local initiatives, which seek to deliver diverse

and affordable housing in NSW. Under the National Housing Accord, NSW is tasked with delivering approximately 376,000 new well-located dwellings. The Parramatta Local Government Area (LGA) has a housing target of 19,500 new completed homes by 2029. The proposed development will make a significant contribution to these housing targets by delivering BTR housing in a strategic location in the Parramatta CBD.

- The proposed development will provide contemporary commercial floorspace that is more aligned with the market demand in the Parramatta CBD and can cater for the evolving needs of office tenants and workers.

Table 4 summarises the proposal's alignment with relevant strategic planning policy.

Table 4 Strategic Planning Alignment

Plan	Detail
Greater Sydney Region Plan – A Metropolis of Three Cities	The Greater Sydney Region Plan is a strategic blueprint for the evolution of Sydney over the next two decades. It addresses key challenges such as accommodating a population surge to eight million by 2056, creating 817,000 new jobs, and building 725,000 new homes by 2036. The plan also outlines a high-level structure for identifying key centres and employment areas, with the Central River City projected to grow from 1.3 million to 1.7 million residents over the next 20 years, supported by significant public and private investment in new transport and infrastructure. The Region Plan includes objectives and strategies in four key areas: infrastructure and collaboration, liveability, productivity, and sustainability. The proposed development site, located within the Central River City, is strategically positioned near existing and future transport hubs, supporting the '30-minute city' concept by offering housing and employment opportunities. The proposal will also address the growing demand for rental housing within the Parramatta LGA. The plan also emphasizes liveability, with the proposal contributing to increased housing supply and affordability. In terms of productivity, the proposal includes commercial floorspace to boost employment opportunities and enhance the economic vitality of the Parramatta CBD. Lastly, the proposal is committed to sustainability, with a high-quality design that includes measures to mitigate, minimise or manage potential environmental impacts.
Central City District Plan	The Central City District Plan is a comprehensive 20-year strategy designed to manage growth in the Central City District, with a particular focus on economic, social, and environmental factors. The Parramatta CBD is recognised as the metropolitan centre of the district, situated within the economic corridor of Greater Parramatta and Olympic Peninsula (GPOP). The District Plan outlines strategic directions, planning priorities, and actions to implement the objectives and strategies of the Region Plan at the district level. It identifies key centres, economic and employment locations, land release and urban renewal areas, and existing and future transport infrastructure to fulfil growth aspirations. The planning priorities and actions relevant to the proposed development focus on liveability, productivity, and sustainability. The proposal aims to establish a high-quality BTR development that will enhance the character of the Parramatta CBD and improve the residential offerings near Parramatta station. This aligns with broader initiatives to provide diverse and affordable housing options in Sydney and New South Wales. The site's location near employment opportunities, transport infrastructure, and other services will boost productivity, with the proposed development creating new employment opportunities, contributing to the '30-minute city' concept. The proposal also includes several sustainability initiatives to minimise its impact on the environment and ensure resilience to climate change.

Plan	Detail
Parramatta Local Strategic Planning Statement	The Parramatta Local Strategic Planning Statement (LSPS) sets a 20-year strategic direction for the City of Parramatta, focusing on community needs and opportunities for jobs, homes, infrastructure, heritage, and land use. The LSPS envisions Parramatta CBD as the primary jobs, services, economic, and business centre of the LGA and the broader Western Sydney region, supported by four Planning Priorities: Local Planning, Productivity, Liveability, and Sustainability. The proposed development aligns with these priorities, focusing on housing and employment growth in the GPOP and Strategic Centres. The development, located within an established metropolitan centre, will contribute to housing growth and new employment opportunities in the central core of Parramatta city centre. It will deliver a mixed-use scheme that includes residential accommodation, commercial office premises, amenities, and landscaping. The proposal will also deliver Build-to-Rent (BTR) accommodation, diversifying the local housing stock and addressing a critical need for residential development in the Parramatta LGA. The proposal incorporates a significant commercial component, contributing to the economic vitality and growth of the Parramatta CBD and employment lands, and includes a range of sustainability measures to minimise the development's impact on the environment.
Parramatta 2050	Parramatta 2050 sets out a vision for Parramatta to become a global city. 'Global Parramatta' includes five districts. The 'Headquarters District' comprises Parramatta CBD and its surrounds and will be the 'business heart' of Global Parramatta. The vision sets out an ambition to be Western Sydney's 'job engine'. 'Key moves' for Parramatta include targeting 150,000 additional jobs by 2050. The proposed development will incorporate a significant commercial office component, which will contribute to the economic vitality of Parramatta and provide new job opportunities in the CBD.
Parramatta Local Housing Strategy 2020	The Local Housing Strategy outlines the vision and objectives for residential growth in Parramatta, emphasising that housing delivery should complement the city's economic significance, focus on identified growth precincts, be supported by necessary local and regional infrastructure, and utilise local mechanisms to improve environmental performance and reduce urban heat impacts. The proposed development aligns with these objectives by offering high-quality residential accommodation in an identified growth precinct, the Parramatta CBD. The development will also include a significant economic component, providing contemporary commercial floorspace that meets market requirements. Furthermore, it is expected that the proposal will contribute to local and state infrastructure and will embody a high-quality, sustainable design that mitigates urban heat island effects through thoughtful material selection, landscaping, and other measures.

The site has the potential for an additional 15% height and FSR for design excellence (subject to a competitive design process), as well as an additional 5% FSR as part of the high performing building bonus and an additional 4:1 commercial FSR as per the Parramatta LEP Clause 7.5. The height and floor space bonuses are detailed further in **Section 4**.

3. PROJECT DESCRIPTION

3.1. SUMMARY OF THE PROPOSED DEVELOPMENT

A reference scheme has been prepared to inform the future design competition for the site. **Table 5** summarises the key components of the reference scheme.

Table 5 Summary table

Descriptor	Project Details
Site Area	2,525m ²
Project Description	The proposal consists of a mixed-use development comprising BTR accommodation, commercial office and retail floorspace, and associated parking.
Total no. of BTR units	422
Total Gross Floor Area (GFA)	40,468m ²
BTR accommodation (including amenities) GFA	30,298.4m ²
BTR FSR	12:1
Commercial (office and retail) floorspace GFA	10,169.6m ²
Commercial (office and retail) FSR	0.4:1
Total FSR	16:1
Building Height	163m (RL 175.75m)
Car Parking	97
Landscaping	NA – to be provided as part of future development proposal

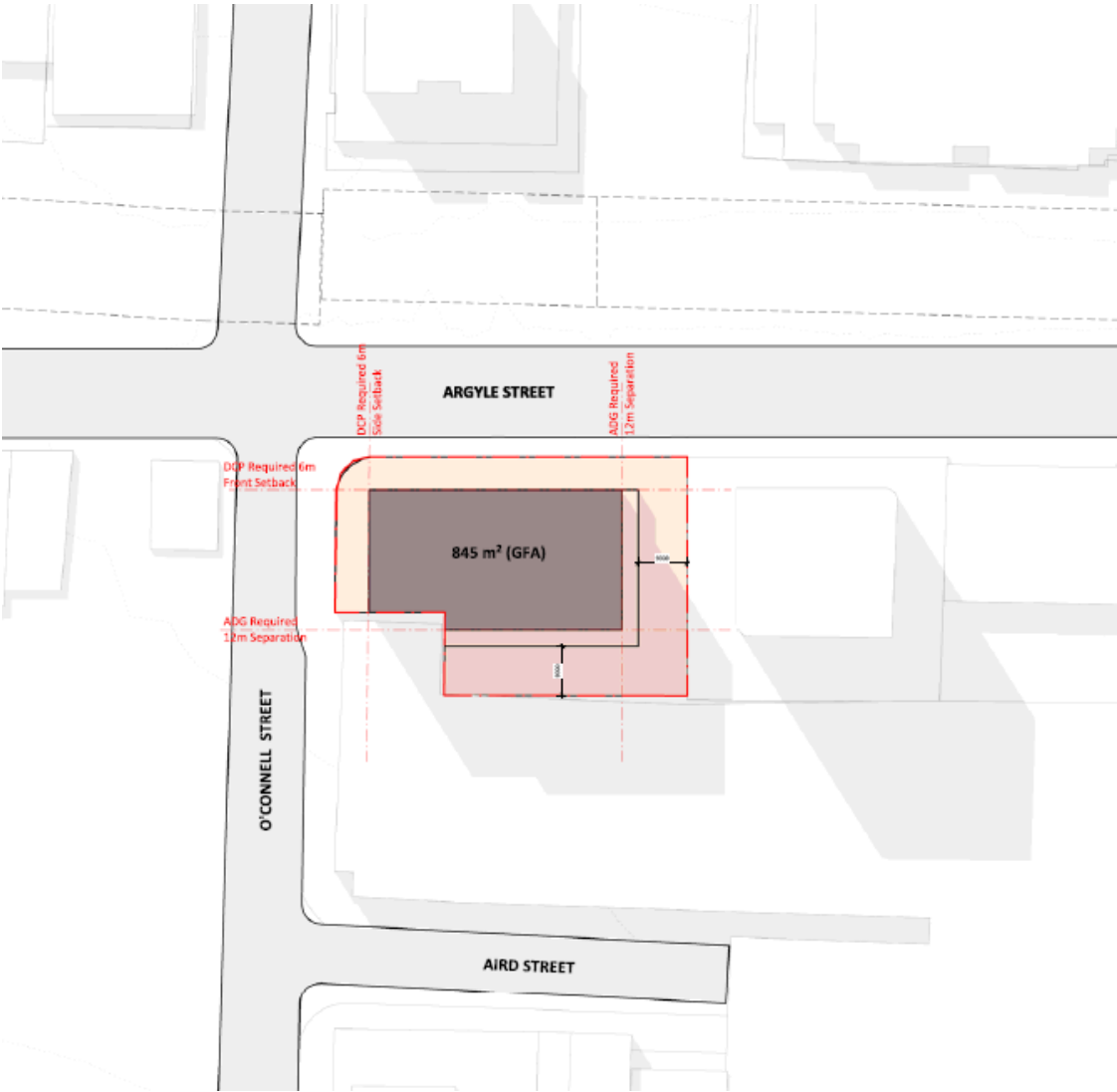
Table 6 summarises the dwelling mix within the reference scheme.

Table 6 Summary of reference scheme dwelling mix

Studio	1-bedroom	2-bedroom	3-bedroom
101	182	88	52

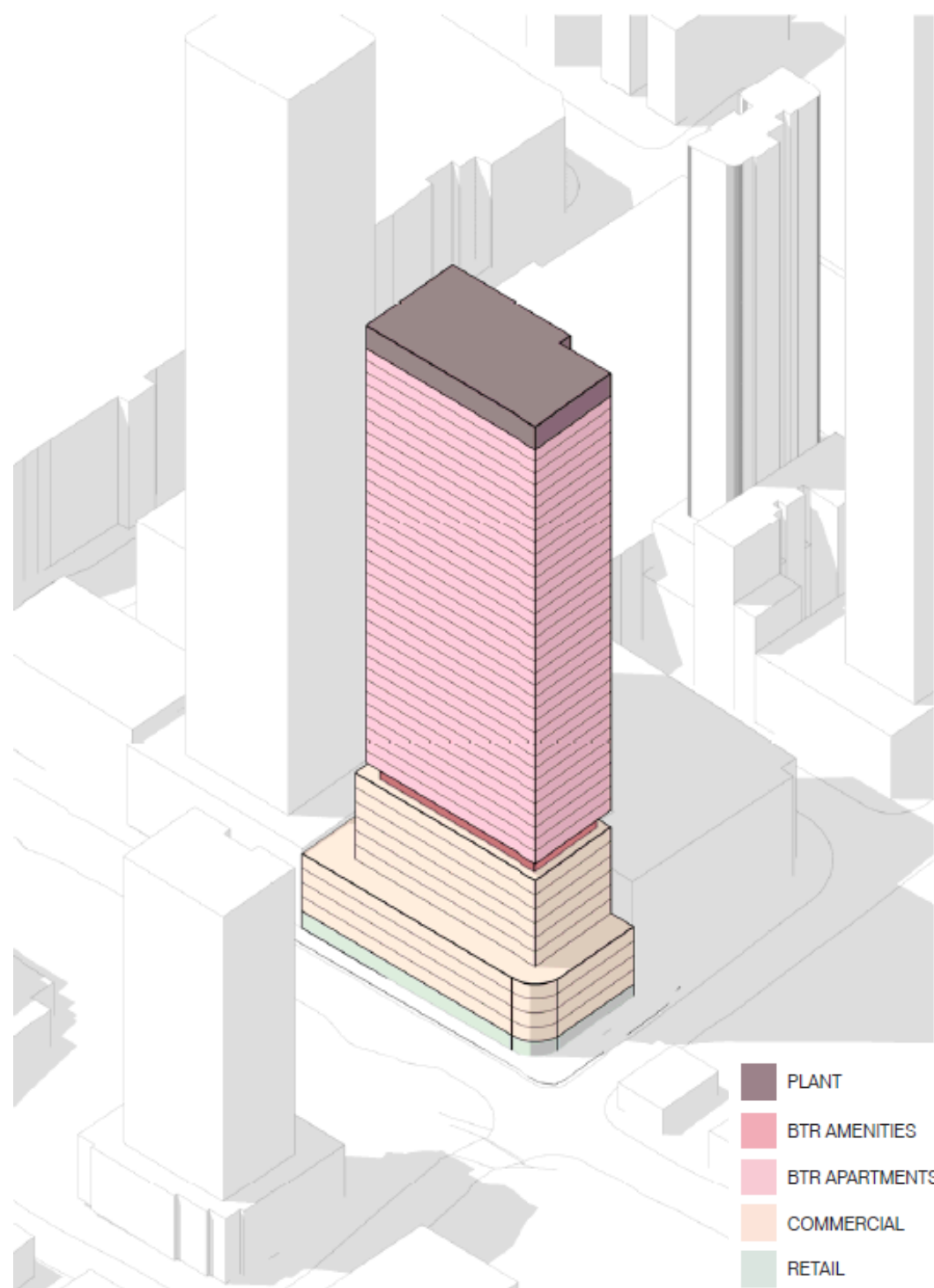
The proposed architectural reference plans are included at **Appendix B** and shown in **Figure 4** and **Figure 5**,

Figure 4 Proposed Building Envelope – Site Plan



Source: PTW

Figure 5 Proposed Building Envelope – 3D Perspective



Source: PTW

3.2. FEASIBLE ALTERNATIVES

Section 192 of the *Environmental Planning and Assessment Regulation 2021* (the Regulation) requires an analysis of any feasible alternatives to the proposed development, including the consequences of not carrying out the development.

The Applicant identified three project alternatives which were considered in respect to the identified need for the proposed development. Each of these options is listed and discussed in the following table.

Table 7 Analysis of Feasible Alternatives

Option	Comment
Option 1 – Consequences of not carrying out the development.	Not undertaking a Build-to-Rent (BTR) residential development in the Parramatta CBD could impede the strategic planning objectives of the Greater Sydney Region Plan and Central River City District Plan. It could obstruct the transformation of Greater Sydney into a metropolis of three cities, as the BTR development would provide essential housing and potential job opportunities. It could also affect the district's economic growth, social needs, and environmental considerations by not attracting investment, creating jobs, or providing diverse and affordable housing options. The '30-minute city' concept could be impacted, as the BTR development's proximity to transport and employment centres is crucial for this goal. Finally, without the BTR development, the activation of an all-day and night economy in Parramatta CBD could be delayed, as it would increase the resident population, supporting local businesses and contributing to a vibrant city centre.
Option 2 – Alternate land uses	A development proposal including solely commercial purposes was considered prior to finalisation of the Parramatta LEP in 2022. However, the removal of the proposed 'no maximum FSR for Commercial Office' resulted in a development that was no longer feasible given the reduced overall demand for commercial office space within Sydney since the covid-19 pandemic and the large supply of vacant offices and office buildings in the construction pipeline. Additionally, this option would not address the critical demand for housing within Parramatta and the wider Western Sydney area and was therefore ruled out. The Applicant has also considered the merits of a BTR development without any commercial floorspace. However, the inclusion of commercial office premises at the ground floor is critical to the vitality of this part of the Parramatta CBD and will further enliven the site and contribute to a balanced and mixed-use area.
Option 3 – Proposed Scheme	The proposed development will optimise the development potential of the site. It will result in an uplift in floorspace on the site whilst fully complying with the maximum building height and floor space ratio controls (and associated bonuses) set out within the PLEP 2023. The proposal will provide high quality BTR accommodation in a very accessible location, which will contribute to addressing the critical requirement for more housing in Parramatta and the wider Western Sydney area. The commercial floor space will support the vitality of the site and the Parramatta CBD. The proposal will respond to site constraints and is fully in-keeping with the character of the surrounding area.

4. STATUTORY CONTEXT

The site is located within the Parramatta Local Government Area (LGA). As such, the relevant Acts and environmental planning instruments (EPIs) relating to the site and relevant considerations for the SSDA are as follows:

- *Environmental Planning and Assessment Act 1979 (EP&A Act)*;
- *Biodiversity Conservation Act 2016 (BC Act)*;
- *State Environmental Planning Policy (Planning Systems) 2021 (Planning Systems SEPP)*;
- *State Environmental Planning Policy (Housing) 2021 (Housing SEPP)*;
- *State Environmental Planning Policy (Resilience and Hazards) 2021 (Resilience and Hazards SEPP)*;
- *State Environmental Planning Policy (Transport and Infrastructure) 2021 (Transport and Infrastructure SEPP)*;
- *State Environmental Planning Policy (Biodiversity and Conservation) 2021 (Biodiversity and Conservation SEPP)*; and
- *Parramatta Local Environmental Plan 2023 (PLEP 2023)*.

4.1. SSD QUALIFICATION

The proposed development has an estimated cost of development of more than \$50 million. The tenanted component of the BTR accommodation will have a value of at least 60% of the overall estimated development cost for the project. Accordingly, the proposed development is classified as State Significant Development pursuant to Section 27 of Schedule 1 of the Planning Systems SEPP.

4.2. STATUTORY REQUIREMENTS

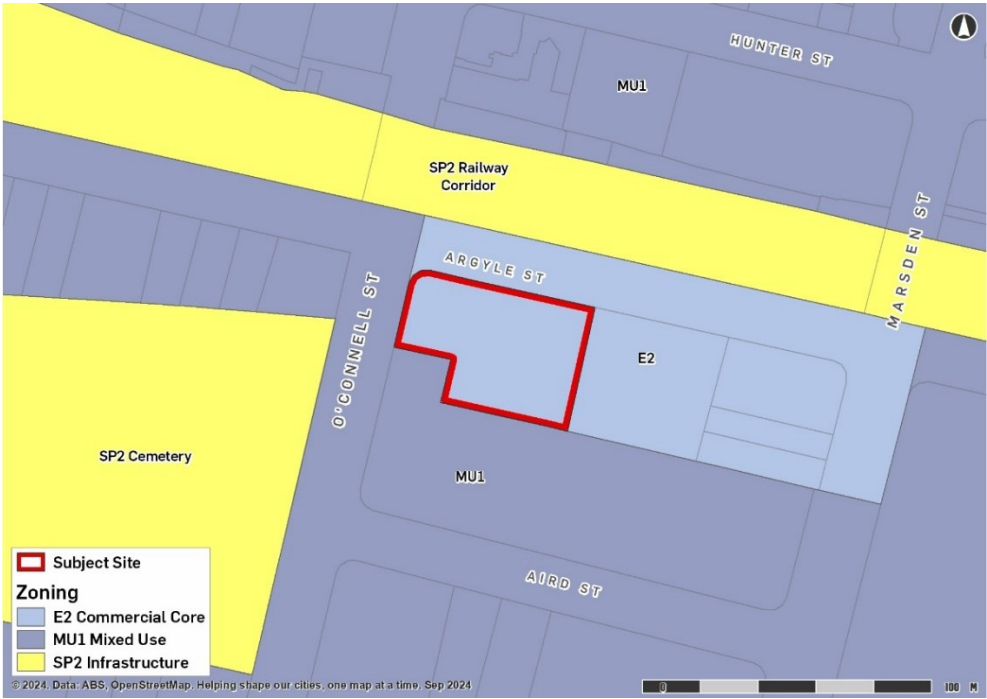
The key statutory requirements that are relevant to the site and the proposed development are as follows.

Table 8 Statutory Requirements

Matter	Guidance
Power to grant consent	Under section 27 of schedule 1 of the Planning Systems SEPP, the development qualifies as SSD because it will: ▪ have an estimated cost of development of over \$50 million and the tenanted component of the development will have a value at least 60% of the estimated cost of the proposed development. The estimated cost of development (EDC) is \$232,934,773 (Excl. GST) (refer to Appendix A) with the EDC of the tenanted component of the proposal exceeding 60% of the EDC. The proposed development is appropriately classified as SSD.
Permissibility	The site is Zoned E2 Commercial Centre under the Parramatta LEP 2023. Development for the purpose of commercial premises (including office premises) is permissible with consent. It is noted that residential accommodation is prohibited. However, BTR development is made permissible in the E2 Zone under Chapter 3 Part 4 cl 72 of the Housing SEPP if the development: ▪ will result in at least 50 dwellings occupied, or intended to be occupied, by individuals under residential tenancy agreements, and ▪ All buildings containing the dwellings are located on the same lot.

The proposed development will contain 426 dwellings in the one building on the same lot. Accordingly, the proposed BTR development is permissible. It is therefore anticipated that the proposed development will result in more than 50 dwellings occupied or intended to be occupied by individuals under residential tenancy agreements. The units will be contained within a single building located on the same lot.

Figure 6 Land Zoning Map



4.3. PRE-CONDITIONS

Table 9 outlines the pre-conditions to exercising the power to grant approval which are relevant to the project.

Table 9 Pre-Conditions

Matter	Guidance
Section 4.24 of the EP& A Act – Concept Development Consent	Determination of any further development application in respect of the site cannot be inconsistent with the consent for the concept proposal for the development of the site. The proposal is seeking detailed approval only and does not seek concept approval.
Section 66 of the EP&A Regulations	Under s66 a development must not be determined by the consent authority unless a contributions plan has been approved for the land. A contribution is not required if the applicant has entered into a planning agreement with a planning authority under Part 7 of the Act for the matters that may be the subject of a contributions plan.
State Environmental Planning Policy (Planning Systems) 2021	Under section 27 of Schedule 1 of the Planning Systems SEPP, the development qualifies as SSD because it will: ▪ have an estimated cost of development of over \$50 million and

the tenanted component of the development will have a value at least 60% of the estimated cost of the proposed development.

The estimated cost of development (EDC) is \$232,934,773 (Excl. GST) (refer to **Appendix A**) with the EDC of the tenanted component of the proposal exceeding 60% of the EDC.

**State Environmental
Planning Policy Housing
(2021)**

Relevant sections:

- Chapter 3 Part 4 Build-to-rent Housing Refer to **Table 4** for further information.
- Chapter 4 Design of Residential Apartment Development.

Section 73 requires for BTR development on land in Zone E2 Commercial Centre, that the tenanted component of the building must not be subdivided into separate lots; must be owned and controlled by 1 person; must be operated by 1 managing agent in perpetuity. The Applicant will ensure compliance with these requirements.

Section 147 requires that development consent is not granted to residential apartment development unless the consent authority has considered the quality of the design of the development evaluated in accordance with the design principles set out in Schedule 9; the Apartment Design Guide (ADG); and any advice received from design review panel within 14 days after the consent authority referred the development application.

Compliance with these matters will be discussed further within the EIS and accompanying design report(s). As detailed above, a competitive design process will be undertaken to ensure that the proposal demonstrates design excellence.

**State Environmental
Planning Policy
(Resilience and Hazards)
2021**

The Resilience and Hazards SEPP provides a state-wide planning approach to the remediation of contaminated land. The SEPP requires the consent authority to consider whether the subject land of any rezoning or development application is contaminated. If the land requires remediation to ensure that it is made suitable for a proposed use or zoning, the consent authority must be satisfied that the land can and will be remediated before the land is used for that purpose. Accordingly, relevant environmental reporting will be prepared and included in the SSDA.

**State Environmental
Planning Policy
(Transport and
Infrastructure) 2021**

The Transport and Infrastructure SEPP aims to facilitate the effective delivery of infrastructure across the State by improving regulatory certainty and efficiency, identifying matters to be considered in the assessment of development adjacent to particular types of infrastructure development and providing for consultation with relevant public authorities about certain development during the assessment process.

The site is located in the Parramatta CBD, surrounded by existing commercial, retail and residential development and can rely upon existing access to bus and rail public transport services.

The site is bounded by two state roads (Argyle Street and O'Connell Street'). The proposal will contain more than 75 dwellings and is therefore characterised as 'traffic-generating' development. Accordingly, the SSDA will be referred to Transport for New South Wales during the public exhibition period.

However, the site is located adjacent to a rail corridor and requires referral to Sydney Trains under Clause 2.98 of the SEPP.

**State Environmental
Planning Policy**

Chapter 2 of the Biodiversity and Conservation SEPP relates to the clearing of vegetation in non-rural areas of the state. It specifies the instances in which a

(Biodiversity and Conservation) 2021

permit is required for the removal of vegetation. Accordingly, the SSDA will be accompanied by an Arborist Report.

The site is located within the designated hydrological catchment of Sydney Harbour. Chapter 6 of the SEPP is relevant and requires the development to achieve improved water quality. The civils strategy for the proposed development will seek to improve water quality. This will be detailed in a civils report.

Table 10 Pre-Conditions under Parramatta Local Environmental Plan 2023

Clause	Control	Compliance
6.4 Stormwater management	Development consent must not be granted unless the consent authority is satisfied that the development – (a) Is designed to maximise the use of water permeable surfaces on the land having regard to the soil characteristics affecting on-site infiltration of water, and (b) Includes, if practicable, on-site stormwater retention for use as an alternative supply to mains water, groundwater or river water, and (c) Avoids any significant adverse impacts of stormwater runoff on adjoining properties, native bushland and receiving waters, or if that impact cannot be reasonably avoided, minimises and mitigates the impact.	To be confirmed at EIS stage.
7.6 Development Control Plan for “Area 3” and “Area 5”	Development consent must not be granted to development to which clause 7.5 applies unless a development control plan has been prepared for the land	A legal opinion has been obtained by the applicant in relation to the applicability of Clause 7.6 to state significant development. The legal opinion confirms that a proposal subject to a SSDA can utilise the floorspace incentives available under Clause 7.5 of the PLEP 2023 without the requirement for a site-specific DCP (or Concept Development Application). In forming this opinion, Mills Oakley note that Clause 2.10(2) of the Planning Systems SEPP states a requirement of an environmental planning instrument that a development control plan be prepared before development consent can be granted to development does not apply to State Significant Development.

7.10 Active frontages	Development consent must not be granted to the erection of a building, or the change of use of a building, on the land unless the consent authority is satisfied the building will have an active frontage for the part of the ground floor of the building facing the street, river or a public space	The final design of the building will be established through a design competition process. Key parameters for the competition will include providing active uses on the ground floor.
7.11 Floodplain risk management	Development consent must not be granted to the erection of a building on the land unless the consent authority is satisfied the building— (a) contains an area that is— (i) located above the probable maximum flood level, and (ii) connected to an emergency electricity and water supply, and (iii) of sufficient size to provide refuge for all occupants of the building, including residents, workers and visitors, and (b) has an emergency access point to land above the 1% annual exceedance probability event, and (c) is able to withstand the forces of floodwaters, debris and buoyancy resulting from a probable maximum flood event.	The north western corner of the site is identified in the PLEP 2023 as 'Floodplain Risk Management Area' in the PLEP 2023. However, the majority of the site is not affected by this designation. The design competition entrants will be informed of the flood risk constraints affecting the site. The winning architectural scheme will be required to demonstrate compliance with clause 7.11 of the PLEP 2023.
7.13 Design excellence and 7.14 Competitive design process	Clause 7.13 requires development involving the erection of a building in Parramatta City Centre to display design excellence. Clause 7.14 requires a design competition to be held for various types of development in Parramatta City Centre before development consent is granted for that development. This includes for development involving the erection of buildings 40m or greater in height outside of 'Area A'	A competitive design process will be held prior to the lodgement of the SSDA. It is anticipated that the competition winning scheme will display design excellence and be the subject of the SSDA.
7.22 Managing Heritage Items	Development consent must not be granted to development to which this clause applies unless the consent authority has considered the following— (a) the extent to which the carrying out of the development is likely to affect the heritage significance of the relevant heritage item or heritage conservation area, (b) a heritage impact statement,	The site is located to the east of St John's Cemetery, which is a state-listed heritage item. The impacts of the proposal on heritage will be addressed in the EIS.
7.26 Commercial premises on land	Development consent must not be granted to the erection of a building unless a gross floor area at least equal to a floor space ratio of 1:1 will be used only for commercial premises.	The final design of the building will be established through a design competition process. Key parameters for the competition will include a minimum commercial floorspace requirement that

4.4. MANDATORY CONSIDERATIONS

Table 11 outlines the mandatory considerations to exercising the power to grant approval which are relevant to the project.

Table 11 Mandatory Considerations

Summary of	Requirement	Compliance
Consideration under the EP&A Act and Regulations		
Section 1.3	The relevant objects of the EP&A Act will be addressed in the EIS	To be addressed in the EIS stage.
Section 4.15 (1)(a)(i) Relevant environmental planning instrument	All relevant EPIs will be addressed in the EIS, these include; - Housing SEPP 2021 - Parramatta LEP 2023 - Resilience & Hazards SEPP 2021 - Planning Systems SEPP - Transport & Infrastructure SEPP - Biodiversity and Conservation SEPP	To be addressed in the EIS stage.
Section 4.15 (1)(a)(ii) Relevant draft environmental planning instrument	N/A	N/A
Section 4.15 (1)(a)(iii) Relevant development control plan	General consistency with the Parramatta Development Control Plan 2023 (DCP) will be addressed in the EIS.	To be addressed in the EIS stage.
Section 4.15 (1)(a)(iiia) any planning agreement or draft planning agreement	N/A	N/A
Section 4.15 (1)(a)(iv) relevant matters prescribed by the Regulations.	Clause 66 Contributions for certain areas of Sydney applies and will be addressed in the EIS and VPA entered into for any matters that may be the subject of a contribution plan should one not be in force for the land on which the application relates.	To be addressed in the EIS stage.
Section 4.15(1)(b) the likely impacts of that development, including environmental impacts on both the natural and built environments, and social and economic impacts in the locality,	The likely impacts of the development have been identified in Section 6 of this scoping report including those matters requiring further assessment in the EIS.	To be addressed in the EIS stage.
Section 4.15(1)(c) The suitability of the site for the development	An assessment of the suitability of the site will be undertaken within the EIS including	To be addressed in the EIS stage.

	whether the proposal fits within the locality and whether the site attributes are conducive to the proposed development.	
Section 4.15(1)(d) Any submissions made in accordance with the Act or regulations	Early engagement will be undertaken with the community and agencies to ensure that the views are appropriately considered and detailed in the EIS. A detailed response to any submissions will be provided following lodgement and public exhibition of the EIS.	To be addressed in the EIS stage.
Section 4.15(1)(2) The Public Interest	The public interest of the project will be fully detailed and addressed within the EIS. Given the alignment of the project with Federal, State and local strategic policy it is considered that the project is in the public interest.	To be addressed in the EIS stage.
Section 4.24	Sets out the provisions for concept approval which will need to be considered for the concept component of the SSDA and any subsequent DA.	The proposal is seeking detailed approval only and does not seek concept approval.
Mandatory relevant considerations under EPIs		
State Environmental Planning Policy Housing (2021)		
Building height	Not more than the maximum building height permitted under Chapter 5 or another environmental planning instrument for a building on the land	The design of the building will be established through a design competition process. Key parameters will be established for the competition, which will include compliance with key development controls and standards for the site. The reference scheme has a height of RL182.05m, which is less than the maximum permitted building height for the site established by the PLEP 2023 of RL211.
Floor space ratio (FSR)	A floor space ratio that is not more than the maximum permissible floor space ratio for residential accommodation on the land under Chapter 5 or another environmental planning instrument	The design of the building will be determined via a design competition process. Key parameters will be established for the competition, which will include compliance with key development controls and standards for the site.

		The reference scheme has an overall FSR of 16.6:1, which is less than the maximum permitted for the site established by the PLEP 2023.
Car parking	0.2 spaces for each dwelling or a lower number of spaces if specified in a relevant planning instrument	The design of the building will be established through a design competition process. The design competition process will establish the key parameters for the competition, which will include compliance with key development controls and standards for the site. The reference scheme includes 85 car parking spaces (excluding visitor spaces) for the BTR apartments, which is consistent with this requirement.
Design Requirements	The consent authority must be flexible in applying the design criteria set out in the Apartment Design Guide, including, in particular, the design criteria set out in Part 4, items 4E, 4G and 4K. Additionally, consideration must be given to amenities proposed to be provided to tenants through common open spaces and shared facilities and services; whether the configuration and variety of dwellings in the building will provide adequate options to prospective tenants in relation to the size and layout of the dwellings, and whether tenants will be able to relocate to other dwellings in the building that will better accommodate their housing requirements if their requirements change	Noted. It is anticipated that the final design (to be determined via a competitive design process) will include common open and shared facilities for residents and demonstrate general compliance with the Apartment Design Guide.
Active uses on ground floor of BTR housing in business zones	Development consent must not be granted for development for BTR accommodation in a Business zone unless the consent authority is satisfied that a building resulting from the development will have an active street frontage.	The design of the building will be determined via a design competition process. Key parameters for the competition will be established, which will include providing active uses on the ground floor.
Parramatta Local Environmental Plan 2023		
Land Use Table	The site is zoned E2 Commercial Core	Complies.

Whilst residential accommodation is prohibited within the E2 Commercial Core zone under the PLEP 2023, the Housing SEPP provides land use permissibility for BTR development under the E2 Commercial Core zone.

4.3 Height of Buildings

- The maximum permitted building height is 211m RL.

As set out above, a development proposal that is the winner of a competitive design process and displays design excellence is eligible for an additional 15% building height

The design of the building will be established through a design competition process. Key parameters for the competition will be established, which will include compliance with key development controls and standards for the site. The winning scheme will be required to comply with the maximum permitted building height plus 15% bonus (i.e. 242.65m).

The reference scheme has a height of 182.05m, which is less than the maximum permitted building height for the site established by the PLEP 2023.

4.4 Floor Space Ratio

- The 'base' maximum floor space ratio is 10:1.
- Several built form bonuses may be applicable to the site redevelopment as stipulated below:

Design Excellence bonus

- Clause 7.15(2) enables additional maximum permissible FSR and maximum building height for the land by up to 15% for development that exhibits design excellence.

High Performing Building Design bonus

- Clause 7.25 applies to high performing building design that minimises energy and water consumption for certain development types. As per Clause 7.25 (3) a development may exceed the maximum permissible FSR by up to 5% if the additional GFA will be used for residential accommodation.
- The site has an FSR control of 10:1. The additional 15% Design Excellence + 5% high performing building bonus (for

The final design of the building will be established through a design competition process. Key parameters for the competition will be established, which will include compliance with key development controls and standards for the site.

The winning scheme will be required to achieve compliance with the 'base' maximum FSR and utilise the additional 'design excellence' and 'high performing design' bonuses'. Additional office floorspace of up to an FSR of 4:1 is expected to be provided. It is anticipated that the proposal will not exceed an overall FSR of 16:1 (4:1 of which will be office floor space).

The reference scheme has an overall FSR of 16.0:1 The commercial component of the scheme has an FSR of 4.0:1.

residential uses only) could result in a **potential total FSR of 12:1.**

Additional floor space ratio – “Area 5”

- Additionally, clause 7.5 is applicable to the site and allows additional FSR of up to 4:1. The additional floorspace must be used for commercial premises.

The overall total potential FSR for the site is therefore 16:1. At least 4:1 of this must be used for commercial premises.

Other legislation

**Biodiversity
Conservation Act 2016**

Biodiversity Conservation Act 2016

Section 7.9(2) of the BC Act requires an SSDA to be accompanied by a biodiversity development assessment report (BDAR). However, a BDAR waiver may be granted should it be determined by DPHI that the proposed development is not likely to have any significant impact on biodiversity values.

A BDAR waiver request will be submitted with the SSDA.

5. ENGAGEMENT

5.1. ENGAGEMENT CARRIED OUT

Significant engagement was undertaken with the City of Parramatta Council regarding the previous proposal for the site for a commercial office scheme. This involved the preparation and submission of a draft DCP for the site to Council and agreement in relation to Council's preferred podium and tower layout, setbacks and massing.

Significant consultation has also been undertaken with Council in relation to ensuring that any future tower form on the site in accordance with Council's preferred envelope would not increase overshadowing St John's Cemetery between the hours of 10am and 2pm midwinter in accordance with the relevant DCP provisions.

Relevant consultation was also undertaken by Council with Transport for NSW in relation to vehicle access arrangements to the site for the previous commercial scheme and site specific DCP which included, access via Argyle Street (applicant preferred) and consideration of a left-in off O'Connell and left-out via Argyle Street (Council preferred) (TfNSW Reference SYD21/01339/01).

The applicant is committed to continue to review all access options in consultation with both TfNSW and Council to inform the Design Excellence Brief. These options will be further analysed in a detailed Transport Impact Assessment to be submitted with the SSDA.

The revised proposal has been subject to ongoing informal discussions with DPHI. Further engagement will be undertaken with DPHI and Council following the issue of industry-specific SEARs.

5.2. ENGAGEMENT TO BE UNDERTAKEN

Further engagement will take place with key stakeholders and agencies to inform the design competition process and during the preparation of the EIS. This will include engagement with the following stakeholders:

- Relevant special interest groups, including local Aboriginal land councils and registered Aboriginal stakeholders
- DPHI
- City of Parramatta Council
- Government Architect NSW (to inform the Design Competition process)
- Transport for New South Wales
- Heritage NSW
- Environmental Protection Authority
- Sydney Trains
- Relevant public utility providers

The EIS will be placed on public exhibition once DPHI has reviewed the EIS to confirm that it has satisfactorily responded to each of the issues identified in the SEARs. The key stakeholders will be provided with an additional opportunity to review the project, including the final development plans and the detailed specialist studies and assessment reports accompanying the final EIS.

6. PROPOSED ASSESSMENT OF IMPACTS

This section identifies the key impacts which will be further investigated and assessed within the EIS, including the proposed approach to assessing each of these matters. It also identifies the matters addressed in the scoping phase that are unlikely to result in significant impacts and do not warrant further consideration in the EIS.

6.1. MATTERS REQUIRING FURTHER ASSESSMENT IN THE EIS

The following table outlines the relevant matters and impacts which will be addressed in detail within the EIS. It outlines the matters and impacts of particular concern to the community and other stakeholders. \

Table 12 Matters requiring assessment in the EIS

Matter	Consideration
Design Excellence	Clause 7.14 of the LEP and the SEARs issued for the Project will require that the development exhibit design excellence. The project is required to be undertake an Architectural Design Competition which will be undertaken, and recommendations of the jury and Design Integrity Panel will be addressed in the design prior to lodgement.
Connection with Country	All future development will consider the Connection to Country Framework prepared by the GANSW. The design excellence strategy and brief will clearly outline how the framework has should be considered and reflected the design schemes. A cultural advisor will be appointed to develop specific connecting with Country objectives to be included in the design excellence brief.
Urban Design and Landscaping	The SSDA will include an urban design and landscaping report to ensure the proposal is of a high quality and landscape led design. The project will be aiming provide a high-quality landscaped outcome on the site that will maximise tree canopies to optimise shade and reduce urban heat island effects. The Urban Design will be informed by Country and will reflect and embed the project objectives and recommendations of the appointed cultural advisor to address the Connection with Country framework.
Amenity	As part of the architectural documentation submitted with the EIS, the following considerations will be addressed: • Explanation of how good internal and external environmental amenity is achieved, including proposed pedestrian movements throughout the site, access to landscape and outdoor spaces. • Assessment of amenity impacts on the surrounding locality, including solar access, visual privacy, view loss and view sharing, overshadowing and wind impacts. • Provision of solar access analysis of the overshadowing impacts of the development within the site, on surrounding properties and public spaces at hourly intervals between 9am and 3pm, when compared to the existing situation. This will include (but not be limited to) an assessment of the overshadowing impacts of the development on St John's Cemetery to the west of the site. Overshadowing diagrams for the reference scheme have been prepared and demonstrate that the proposal will not result in overshadowing to the cemetery between after 10am on the Winter solstice. Additionally, wind effects testing will be undertaken to inform the proposed development. The testing will assess whether the proposed development will result in suitable wind conditions within the site and if any mitigation measures are required. Initial wind effects advice will be provided to inform the design competition.
Aviation	An Aeronautical Impact Assessment will accompany the EIS to provide an assessment of the proposed development against relevant Obstacle Limitation Surface (OLS) controls given the site's proximity to Bankstown Airport, Sydney Airport and helipads in the Westmead Health Precinct.
Noise & Vibration	A Noise and Vibration Assessment will be undertaken to demonstrate compliance with the relevant policy and legislation. Given the site's proximity to two classified roads and a railway corridor, the assessment will consider internal noise levels within the proposed BTR apartments. The assessment will also detail construction and operational noise, and vibration impacts on nearby sensitive receivers and structures and outline the proposed management and mitigation measures that would be implemented.
Visual	The site is located close to the Park Edge Highly Sensitive Area as well as Parramatta Park and 'Old Government House' (OGH) (State and UNESCO World heritage listed items). A

Matter	Consideration
	review of “<i>Development In Parramatta City and The Impact On Old Government House And Domain’s World And National Heritage Listed Values Technical Report</i>” by Plannisphere has identified that the site is located in Precinct 7 (City Edges) which an area mapped as ‘Sensitive’. The Plannisphere report notes that development in these areas may have some impact but there is no risk of resulting in significant impact upon the World and National Heritage values of OGH. In addition to the above the site will no impact upon the historic views to be protected nor is it within the Park Edge Highly Sensitive Area identified in the PDCP 2023. Given the above an EPBC referral is not considered warranted for this development. Nevertheless, views to and from the future building will be considered in a detailed visual analysis of the development from key viewpoints, including assessment against the relevant DCP and Planisphere requirements and photomontages or perspectives showing the proposed and likely future development from key view locations, will be provided in the EIS. Design teams participating in the design competition will be advised of, and required to have regard to, the site’s visual impact sensitivities and proximity to historically and culturally significant landscape areas and attractions. Potential impacts on district views and vistas from Parramatta Park and Old Government House and Domain will be assessed as part of the future SSDA.
Access & Transport	The site is located adjacent to two classified roads (Argyle Street and O’Connell Street’). Suitable vehicular access arrangements will be proposed through continued consultation with TfNSW and Council. A Traffic Impact Assessment will be prepared by a suitably qualified consultant to support the SSDA. It will address: • Future transport networks, traffic generation and circulation, impacts on the road network and car parking • Linkages to existing and planned public transport • Pedestrian and cycle access within and to the site and connections to other transport services; and • Relevant TfNSW and Council standards, controls and guidelines.
Water and Flooding	Analysis of the site’s water and stormwater conditions will be included in the civil infrastructure report and plans. Potential changes to the hydrology of the site will be addressed in the standard soil and water assessment, including potential erosion and sedimentation impacts during construction of the development. The stormwater management plan will: • Provide details of the proposed drainage design for the site including any on-site treatment, reuse and detention facilities, water quality management measures and nominated discharge points; and • Demonstrate compliance with Council or other drainage or water authority requirements and avoid adverse impacts on any downstream properties. The City of Parramatta’s online flooding mapping indicates that the northwestern corner of the site is within an area at ‘low risk’ of flooding. This has informed vehicle access arrangements and the proposed above ground car parking. Initial advice will be obtained from a flood engineer to inform the competitive design process. Further assessment will also be provided within the EIS.
Earthworks	Whilst the proposed development does not propose a basement, civil plans will be prepared to identify and manage any negative impacts as a result any earthworks. It is expected that some excavation and piling will be required for footings etc.
Land Contamination	The suitability of the site in terms of existing contamination, to undergo the proposed development is expected to be appropriate. A Detailed Site Investigation (DSI), Hazardous Buildings Material Survey, and a Salinity Investigation will be prepared. Any necessary further investigation will be conducted and explored in the EIS.
Geotechnical	A Geotechnical Report will provide an assessment of the ground conditions of the site and any risks associated with ground stability or proposed excavation. The report will detail the findings from desktop review of the site and borehole testing where necessary. The report

Matter	Consideration
	will recommend appropriate temporary and permanent site support and retention measures if required. The Geotechnical Report will also assist to determine any required engineering and earthworks to achieve the proposed development outcome.
Waste	The proposed development is expected to generate waste during the demolition, construction, and operation phases. A Waste Management Plan (WMP) will be attained to determine the extent of management required and will be in accordance with waste regulatory frameworks and legislation.
Biodiversity	The site has no existing deep soil areas, however there are two (2) mature trees along the Argyle Street and O'Connell Street road reserve (footpath). The site contains a small, landscaped area along the north western street frontage. The EIS will demonstrate how all street trees will/can be maintained throughout the construction and operational periods. The Applicant intends on securing a BDAR waiver from DPHI following lodgement of the SSDA.
Aboriginal Heritage	Consultation with Aboriginal Community representatives will be conducted and assessed in an Aboriginal Cultural Heritage Assessment Report (ACHAR) as part of the SSDA. Advice will be provided by a specialist 'connecting with country' consultant to inform the architectural design competition. It is anticipated that designing with country will form a key component of all competition schemes and that the future development will interpret Parramatta's indigenous and cultural heritage in the building design, public spaces and public art. Following the design competition, the appointed design team will engage with Aboriginal stakeholders in accordance with the GA NSW's Connecting with Country framework.
European Heritage	The site is not identified as a listed heritage item, nor is it within a Heritage Conservation Area. However, St John's Anglican Cemetery is located in its vicinity immediately west of O'Connell Street. It is Australia's oldest surviving cemetery post European settlement with graves from the 1788 First Fleet and of well-known pioneers. The site is also located within the vicinity of other locally listed heritage items including: ▪ Two-storey residence – 41 Hunter Street, Parramatta ▪ Travellers' Rest Inn Group (and potential archaeological site) – 14 O'Connell Street and 16 Hunter Street, Parramatta Parramatta Park and Old Government House and Doman (OGHD) are located further north west of the site. OGHD is one of eleven sites in a group forming the Australian Convict Sites on the UNESCO World Heritage list. The site is also listed on the Parramatta Historical Archaeological Landscape Management Study as having high potential for locally significant archaeological resources. Advice will be provided by a specialist heritage and archaeological consultants to inform the architectural design competition. Future development on the site will be required to recognise the archaeological potential of the site and respect the heritage character of the precinct. This will include conserving the heritage significance of St John's Anglican Cemetery and Parramatta Park and Old Government House by respecting the heritage built forms and setting, including having regard for significant views and vistas. Overshadowing impacts to the Cemetery will also be minimised. A Statement of Heritage Impact and an Archaeological Impact Assessment will be prepared to support the SSDA.
Building Code of Australia	A BCA report will be prepared for the development and will present the findings of an assessment of the proposed building against the Performance Requirements of the Deemed-to Satisfy provisions of the Building Code of Australia. The assessment will also identify whether the development will rely on an Alternate Solution based assessment.
Access	An access report will be prepared for the development to ensure that disabled access can be provided in accordance with <i>Disability Discrimination Act 1992</i> . The access report will demonstrate how access for all users is addressed through the development.

Matter	Consideration
ESD	An Ecologically Sustainable Development (ESD) Report will be prepared to provide a sustainability assessment development. The ESD report will provide an assessment of the building design and demonstrate ways in which the development can achieve best practice and compliance with sustainability requirements.
Economic Impact Assessment	The economic impacts will be assessed and addressed in the EIS within an accompanying Economic Impact Assessment. The economic impact assessment will address the need for the proposed floorspace and its impacts by considering: ▪ Demand for BTR accommodation within Parramatta ▪ Forecast growth in demand based on future population growth ▪ Existing supply and vacancy rate for commercial office to support the quantum of commercial office being provided.
Social Impact & CPTED	A Social Impact Assessment will be prepared assess the social consequences the project, namely the impacts on affected groups of people and on their way of life, life chances, health, culture, and capacity to sustain these. The SIA will address the positive and negative impacts associated with the project, as well as the measures to mitigate these impacts. The SIA will be prepared in line with the NSW Guidelines for Social Impact Assessments. A CPTED Assessment will detail how a development has been designed to reduce opportunities for crime by embedding a variety of design and place management principles into the Design.
Community Engagement	An Engagement Outcomes Report will be provided as required by the SEARs. The Report will outline the engagement carried out to date, the outcomes of that engagement and how it has informed the proposal. The report will provide evidence of a transparent and collaborative engagement process. This document will be included in the Environmental Impact Statement (EIS) as part of the SSDA. The document will also outline: ▪ Issues raised by surrounding landowners & stakeholders. ▪ Project response to issues ▪ Proposed future community and stakeholder engagement based on the results of consultation.

6.2. MATTERS REQUIRING NO FURTHER ASSESSMENT IN THE EIS

This section of the report identifies the following matters that do not require further assessment in the EIS. Each of these matters was considered within the scoping phase but considered unlikely to result in significant impacts that warrant further assessment.

- **Access – port/rail facilities:** The site is not within proximity to a port or approved rail facility. Future consideration will be given to the site strategic context, including future rail corridors within a separate section of the future EIS.
- **Hazard and Risks – Biosecurity, Coastal hazards, Land movement:** The site is not in a coastal area. The existing and proposed operations are not classified as hazardous or offensive development or a biosecurity risk.
- **Air – gas:** The proposed future operation does not emit any gases that warrant assessment such as greenhouse gas.
- **Amenity – air quality and odour:** The proposed future operation will not cause any anticipated air quality or odorous issues, and thereby does not warrant further assessment beyond the standard Air Quality assessment required by the SEARs.
- **Biodiversity:** Given the limited vegetation on the site a BDAR waiver will be obtained and provided with the SSDA. No additional assessment will be required in relation to this matter.
- **Bushfire:** The site is not identified as bushfire prone and as such will not required further assessment in the EIS.

7. CONCLUSION

The purpose of this report is to request industry-specific SEARs for the preparation of an EIS for the mixed-use Build to Rent and commercial building proposed at 27-31 Argyle Street, Parramatta. The proposal meets the requirements for SSD per Schedule 1 Clause 27 of Planning Systems SEPP.

The proposal will revitalise the existing site, providing high quality residential accommodation and office floorspace in a highly sustainable and desirable location. The Applicant is committed to working with key stakeholders, including State government agencies and the City of Parramatta Council to deliver a high-quality development.

This SEARs request outlines the approval pathway for the application, the legislative framework and the key matters for consideration in the assessment of the application. The EIS will demonstrate how the proposal is suitable for the site and the potential environmental impacts of the proposed development can be appropriately mitigated, minimised or managed.

We trust that the information detailed in this letter is sufficient to enable DPHI to issue the SEARs to guide the preparation of the EIS.

DISCLAIMER

This report is dated 18 September 2024 and incorporates information and events up to that date only and excludes any information arising, or event occurring, after that date which may affect the validity of Urbis Ltd (**Urbis**) opinion in this report. Urbis prepared this report on the instructions, and for the benefit only, of PM2 Argyle Pty Ltd (**Instructing Party**) for the purpose of Request for Industry Specific SEARs (**Purpose**) and not for any other purpose or use. To the extent permitted by applicable law, Urbis expressly disclaims all liability, whether direct or indirect, to the Instructing Party which relies or purports to rely on this report for any purpose other than the Purpose, and to any other person which relies or purports to rely on this report for any purpose whatsoever (including the Purpose).

In preparing this report, Urbis was required to make judgements which may be affected by unforeseen future events, the likelihood and effects of which are not capable of precise assessment.

All surveys, forecasts, projections and recommendations contained in or associated with this report are made in good faith and on the basis of information supplied to Urbis at the date of this report, and upon which Urbis relied. Achievement of the projections and budgets set out in this report will depend, among other things, on the actions of others over which Urbis has no control.

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**APPENDIX A ESTIMATED DEVELOPMENT COST (EDC)
ESTIMATE**

APPENDIX B REFERENCE ARCHITECTURAL PLANS

