

Department of Planning, Housing &
Infrastructure
Attention: Paula Bizmis
paula.bizimis@planning.nsw.gov.au

Your Reference	SSD-100034211
Our Reference	NCA/24/2025
Contact	Alex McDougall
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11 December 2025

Dear Ms Bizmis

COUNCIL COMMENTS – SEARS

89-91 George Street, Parramatta Mixed Use Development (SSD-100034211)

I refer to the request from NSW Department of Planning, Housing and Infrastructure (DPHI) in relation to the above-mentioned application at 89-91 George Street, Parramatta to provide comment on the Secretary Environmental Assessment Requirements (SEARs) for the proposed mixed-use development.

This letter outlines Council Officer's advice regarding the issuing of SEARs for the project. Additional commentary is provided where relevant to explain context.

It is noted that Council Officers attended the Planning Focus Meeting on 10 December 2025, where the applicant presented the proposal and Council officers provided some initial verbal feedback on the merits of the proposal. We will provide our written comments on the merits of the proposal at the future EIS notification stage.

Request for information to be included in the SEARs/EIS content

The SEARs should include standard planning assessment requirements, along with the following documentation specific to the proposal:

- Economic Impact Statement – Given the proposed rezoning (additional heights, FSR, permitted uses), it is recommended that an Economic Impact Statement be completed which:
 - Provides a clear breakdown of existing GFA proposed to be replaced, by land use type.
 - Provides a clear breakdown of GFA by land use type in the original approved proposals, and estimate the jobs created in each land use component.
 - Assesses and justifies any difference in jobs numbers between the previously approved and current proposal, including long-term economic impacts to the City that might result.
 - Provides a clear analysis of demand for retail and other population-serving commercial uses generated by the proposal. This should include greater emphasis on the role of retail in developing a precinct that serves and reflects the scale of the proposal and

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population in-situ, regardless of eventual use. The proposal should be justified in light of this analysis, ensuring the proposal responds to retail demand.

- Infrastructure Plan (and associated letter of offer) – It is understood that the proposal includes 5% of all residential floor space as affordable housing in perpetuity. While Council generally supports affordable housing, particularly in perpetuity, it may not necessarily be the optimal public benefit in this location. The proposal will result in a significant influx of residential occupants into an area for which Council has only planned for commercial occupants. As such, Council’s infrastructure planning does not account for the needs of such residents, including open space, community facilities, and the like. As such an Infrastructure Plan should be developed to identify the most appropriate infrastructure for the proposal. Such infrastructure should be included in an appropriate ‘letter of offer’, to be formally captured by a future planning agreement.
- Heritage Impact Statement – Given the heritage fabric in the vicinity of the site, a Heritage Impact Statement must be developed demonstrating the proposal will have an acceptable impact on the items.
- Conservation Management Plan - The proposal must include an updated Conservation Management Plans for Perth House (and the other adjacent heritage) as required by clause 7.22(3) of the PLEP 2023. The Plan must demonstrate that the proposed lot amalgamation sufficiently protects the significance of Perth House, and if it does, demonstrate that future development at the Perth House site (85 George Street) can accommodate development of a similar scale without unduly impacting the heritage significance of the adjacent items (see site isolation below).
- Site Isolation – Given the concurrent proposal at 1 Barrack Lane / 81-83 George Street, the proposal has the potential to isolate 85 George Street (particularly given its heritage constraints). As such evidence of reasonable offers to purchase 85 George Street for incorporation in the site, and the owner’s response, should be procured. If sufficient offers to gain control of the site are not accepted, the applicant must demonstrate there is a commercially viable, heritage sensitive envelope on the adjoining site. This must demonstrate the maximum available density can be accommodated at 85 George Street, given the same heritage impact justifications that apply to the two adjacent sites would no doubt apply to the Perth House site. It is not simply enough to say no future development would be approved to the rear of 85 George Street due to its impact on the heritage item. It should be noted that the available FSR from 85 George Street would almost be sufficient to account for the desired density at the subject site. Inclusion of 85 George Street in the site would ensure no future development to the rear of Perth House and justify the proposed minimal side setbacks.
- Design Report – While it is noted the design competition for the extant office tower approval (DA/662/2022) included an ‘inverted’ or ‘eroded’ podium, it is Council officer preference that a more traditional podium, with setback tower above, be considered for the site (noting the competing constraints of maintaining views to Perth House, and the Perth House olive tree adjacent the site). As such it is recommended that the Design Report (and Heritage

Impact assessment) undertake further consideration of the above typology, which is Council's desired future character for the area.

- Legal Advice – It is recommended that legal advice be provided as to the appropriate management of affordable housing in perpetuity in a Build to Rent setting, noting subdivision of the units is not allowable, and that a covenant would need to be placed over the whole site to secure the affordable housing.
- Constructability – The novel construction methodology for a building of this size should be supported by structural engineering advice and BCA compliance advice from appropriate professionals prior to determination.
- Accessibility Report – In addition to the more traditional requirements of an Accessibility Report, it is recommended the report specifically consider the level of work required to convert the adaptable units. If the level of work is so onerous as to likely disincentivise the letting of units to the less able bodied, then an appropriate proportion of units should be permanently provided in the fully adapted configuration.
- Wind Tunnel Test Reports – Given the scale of the proposed building wind tunnel testing and reporting should be undertaken considering the wind impacts resulting from the proposal on both the public domain, the curtilage and the adjoining heritage fabric, any open spaces around the building or on structure, including podium, and on the modular façades themselves. Of note, several tall towers in Parramatta have required post-construction retrofit to address issues with wind noise.
- Sydney Metro – All applicable documentation requirements related to protection of the Sydney Metro tunnel under the site. It should be noted that Sydney Metro refused to support a deferred commencement condition to address such matters during assessment of the previous application on the site.
- Acid Sulphate Soils Management Plan – It is noted that the site is located in a Class 4 acid sulphate soils area and will require works more than 2m below ground and as such an Acid Sulphate Soils Management Plan is required by Clause 6.1 of PLEP 2023.
- Aeronautical Impact Assessment – Given the height of the building an Aeronautical Impact Assessment will be required. It is recommended early engagement be made with the relevant authorities given their long lead in times for approval.
- Services Plan – In addition to the standard requirements of a Services Plan, the following specific details should be included:
 - Dual Piping – Include details of how dual piping will be provided to modular units to ensure they can connect to future reticulated wastewater network.
 - Substation - Include consideration of substation requirements for the site. It is likely that a significant substation would be required, which would have a significant impact on the design of the front setback. The extant approval on the site went to the

lengths of securing a direct high voltage connection to the site from the nearest district transformer.

- Public Art Plan – Given the scale, location and front setback available to the development, there is a significant opportunity for the inclusion of publicly viewable artwork(s) at the site. A draft Public Art Plan should be included with the proposal.
- Visual Impact Assessment – Given the prescribed view corridor down George Street, and the presence of an adjoining heritage item, it is considered that a Visual Impact Assessment should be provided.
- Visual Mock Up / Prototype – Given the proposal seeks to make use of a modular construction method and also exemption from a full design competition, it is recommended that a full-scale and fit-out mock-up of one of the studio units be developed and inspected prior to determination of the application to assess the occupant amenity of the building (given the significant ADG non-compliances that are anticipated) and the quality of the façade.
- Acoustic Report – Along with the standard acoustic report requirements, consideration of the impacts of the proposed extended hours of construction, including the impact of trucks on residential areas along their whole route from the source of the pre-fabricated units.
- Evidence to justify Podium Parking – It is noted the proposal provides parking within the podium. Above ground parking is generally not considered to be appropriate unless there are appropriate site constraints, such as flooding for which passive protection of basement cannot be provided (up to 1:100year flood event), or where there are archaeological relics that must be maintained, or there is some other constraint (such as the metro corridor). It is noted 2 basement levels were included in the extant consent DA/662/2022. As such it is not clear why the parking cannot be provided in the basement.
- Arborist Report – The adjoining Perth House gardens include an olive tree in the eastern setback of the site. This tree is considered to be part of the heritage fabric of Perth House. As such an Arborist Report will be required specifically outlining protection requirements for this tree.
- Flood Report – The site is affected by overland flow, 1:100 year, and PMF flooding. As such appropriate flood reporting and emergency management planning will be required. Details are outlined in PLEP 2023.
- Lift Report – Given the high occupancy of the proposed building, a detailed lift traffic analysis report must be submitted demonstrating that the proposed number, type, and speed of lifts is sufficient to provide a good level of amenity for future occupants.
- Reflectivity Report – Given the significant scale of the building it is considered appropriate to undertake a reflectivity analysis and report to ensure the safety and comfort of the public.

- Fire safety report identifying how the proposed modular construction will satisfy fire safety standards, including methods of evacuation during natural disasters in a high density high rise development.

Council appreciates the opportunity to comment on the above application and looks forward to further consultation on this matter.

It should be noted that the above comments represent the views of Council officers and no formal endorsement of these comments has been provided by Council.

Should you wish to discuss the above matters, please contact Alex McDougall (Acting Manager, City Significant Development) on 9806 5998 or at amcdougall@cityofparramatta.nsw.gov.au

Yours sincerely



Mark Leotta
Group Manager
Development & Traffic Services Unit