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Build to Rent – Concept Development Application
2A Gregory Place, HARRIS PARK, NSW 2150

ENVIRONMENTAL IMPACT STATEMENT

Submitted to Department of Planning and Environment
July 2022

Contact

This report has been prepared by:

James Matthews
July 2022 (Version 1)

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GLOSSARY & ABBREVIATIONS

ABBREVIATION	DEFINITION
ACHAR	Aboriginal Cultural Heritage Assessment Report
ADG	Apartment Design Guide
ARH SEPP	State Environmental Planning Policy (Affordable Rental Housing) 2009
BCA	Building Code of Australia
BC Act	Biodiversity Conservation Act 2016
BDAR	Biodiversity Assessment Report
BTR	Build-to-rent
CBD	Central Business District
CCTV	Closed-Circuit Television
CHP	Community Housing Provider
CIV	Capital Investment Value
CMP	Conservation Management Plan
CMP	Construction Management Plan
CPTED	Crime Prevention Through Environmental Design
DA	Development Application
DCP	Development Control Plan
DPE	Department of Planning and Environment
EIS	Environmental Impact Statement
EPA Act	Environmental Planning and Assessment Act 1979
EPI	Environmental Planning Instrument
ESD	Ecologically Sustainable Development
GPOP	Greater Parramatta and Olympic Peninsula
GST	Goods and Services Tax
HCAC	Heritage Council Approvals Committee
LEP	Local Environmental Plan
LSPS	Local Strategic Planning Statement
NSW	New South Wales
OLOL	Our Lady of Lebanon Cathedral
OSD	On-Site Detention
PMF	Probable Maximum Flood
QS	Quantity Surveyor
RAP	Remediation Action Plan
SCC	Site Compatibility Certificate
SDRP	State Design Review Panel
SEARs	Secretary's Environmental Assessment Requirements

SEPP	State Environmental Planning Policy
SHL	State Heritage Listed
SoHI	Statement of Heritage Impact
SIA	Social Impact Assessment
SSD	State Significant Development
SSDA	State Significant Development Application
PCH	Pacific Community Housing
PSB	Parramatta Sand Body
WHS	Workplace health and safety

SIGNED DECLARATION

Project details	
Project Name	Gregory Place Build-to-rent
Application Number	SSD-31179510
Address of development	2A Gregory Place, Harris Park
Legal Description	Lot 2 DP802801
Project summary	To develop a residential apartment development 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 10,210m² (52.4%) of landscaped area on the ground plane, comprising courts, passages, accessways, parks and the Clay Cliff Creek channel walk, and 483 dwellings (of which 50% are affordable housing).
Applicant Details	
Applicant Name	2A Gregory Place Pty Ltd
Application Address	2A Gregory Place, Harris Park
ABN	42084560789
Details of person by whom the EIS was prepared	
Name	James Matthews
Company	Pacific Planning Pty Ltd
Address	PO Box 8, Caringbah, NSW, 1495
Professional Qualifications	BSc (City and Regional Planning) Diploma (Town Planning)
Social Housing Provider	
Name	Pacific Community Housing
Tier	3
Registration No.	R8 144201127

I certify that the content of the Environmental Impact Statement, to the best of my knowledge, has been prepared as follows:

- the EIS has been prepared in accordance with Division 5 of Part 8 of the EP&A Regulation 2021,
- the EIS contains all available information relevant to the environmental assessment of the development, activity or infrastructure to which the EIS relates
- the information contained in the EIS is neither false nor misleading

Name/Position	James Matthews/Director	Matthew Daniel/Director
Signature		
Date	7 July 2022	7 July 2022

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Summary

This Environmental Impact Statement (EIS) has been prepared by Pacific Planning Pty Ltd on behalf of 2A Gregory Place Pty Ltd in support of a State Significant Development Application (SSDA) for a build-to-rent residential development with 50% affordable housing managed by Pacific Community Housing (PCH) The application seeks consent for concept approval for land located at 2A Gregory Place, Harris Park.

The project is classified as SSD as it comprises development for the purpose of '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).

The Concept development application (DA) will facilitate the development of a residential apartment development 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 10,210m² (52.4%) of landscaped area on the ground plane, comprising courts, passages, accessways, parks and the Clay Cliff Creek channel walk. The project includes approximately 483 dwellings (of which 50% are affordable housing) with 48,685sq.m of total gross floor area at an FSR of 2.5:1.

This EIS has been prepared in response to the Secretary's Environmental Assessment Requirements (**SEARs**) issued on 28 April 2022 (refer to Appendix A for the SEARs Compliance Table).

Subject Site

The land to which this concept DA applies is located at 2a Gregory Place, Harris Park. It has an area approximately 19,480sqm and has an irregular rectangular shape. 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 1: Site Identification Plan

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. 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 Cathedral (OLOL) 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.

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 design workshops in 2015.

At that time, a concept design for the site was developed based upon 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

However, in 2016 the proposition to deliver significant affordable housing in a strategically well positioned location due to its proximity to transport and services was first identified. 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 (SSC) to the Department of Planning and Environment pursuant to the provisions of Division 5 of the Affordable Rental Housing SEPP 2009 (ARH SEPP) (now Housing SEPP 2021).

On 19 July 2017, under the provisions of Clause 37 of Division 5 of the ARH SEPP a SCC was issued, subject to conditions, for *"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, among other matters that "*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".*

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 Heritage Council minutes, dated 2 March 2021, confirmed at point 4 that they:

"4. Supports progression of the scheme to Stage 1 Development Application".

Further, in relation to condition 1 of the SCC, that requires a partnership with a social housing provider to be in place prior to the lodgement of a development application, PCH will provide community housing in their capacity as a registered tier three Community Housing Provider (CHP) under the national regulatory framework.

Pacific Community Housing

PCH is a registered CHP guided by a mission statement that seeks to promote and provide access to safe and secure affordable housing in Sydney for those that require it.

By application of the mission, PCH seeks to provide longer and stable term housing tenancies to support those on lower and moderate incomes .PCH seek to reduce living costs of housing, so tenants can have opportunities for life choices to advance to their personal best and have opportunities to enjoy the community where the choose to live.

PCH works with its partner clients to seek and advance opportunities to supply increased project value through the delivery of social benefits in projects. The project at 2A Gregory Place is the second of PCH's larger projects in western Sydney. The project will:

- Provide a minimum of 50% of the dwelling yield as affordable housing in line with the Ministerial Guide.
- Be guided by specialist social planning study to ensure dwelling typology is targeted to the social need of this community.
- Will be designed to enhance sustainable living costs through good design, material selection, energy efficiency to reduce project life cycle maintenance costs.
- Seek to enhance social cohesion, walkability and connection to new transport, employment and education opportunities.
- Seek to deliver new open space areas for residential and community enjoyment.

Feasible Alternatives

Several alternatives to the proposal have been identified and considered as part of the proposed future use of the site. The feasible alternatives considered by the EIS include:

Option 1 – Do nothing

The site is currently used as commercial offices, however most of the site is disused and in decay, being the home of a former pharmaceutical manufacturing plant.

The industrial use is now redundant and does not compliment the setting within which the site sits. An alternative use that responds to the setting, surrounding residential and open space, and most importantly sensitive heritage context of the locality is appropriate. Doing nothing would result in the underutilisation of the site in its context near the Parramatta CBD.

Therefore, doing nothing, is not an option, is not the best outcome for the site and is inconsistent with the strategic planning framework.

Option 2 – Industrial Development

A new industrial development on the site is not desirable. The site is identified for future residential under Parramatta's Employment Lands Strategy and an industrial development would not be compatible with its surroundings, including the local heritage significance and open space.

Therefore, given industrial development, while permissible, is not consistent with the envisaged future strategic planning process, it is considered that this is not a desirable option.

Option 3 – Original Design

At the time of the original design in 2015, 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.

Following the issuing of the SCC and the conditions related to design and consultation with the Heritage NSW and the Heritage Council Approvals Committee (HCAC), a new scheme has been advanced. Subsequently, the original scheme was abandoned, and workshops continued with the HCAC, in addition to a peer review process with Emeritus Professor Mr Alec Tzannes AM and presentations with the NSW State Design Review Panel (SDRP). In this context, reverting to the original scheme would be inconsistent with the work undertaken with the relevant bodies and experts.

Option 4 – Alternative Building Design

The concept process has been subject to a rigorous design process. There has been a significant shift from the original layout, developed with Parramatta City Council (radial scheme with visual corridors between colonial Heritage Items) to a scheme that is embedded with Caring for Country and better

connecting with the context. As a result of consultations with the HCAC, peer review panel and the SDRP the existing concept has been advanced, which satisfies the condition of the SCC.

The Proposal

The concept DA seeks to facilitate a residential development of three freestanding 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 final development outcome will be subject to further stages of development applications, assessment and approvals.

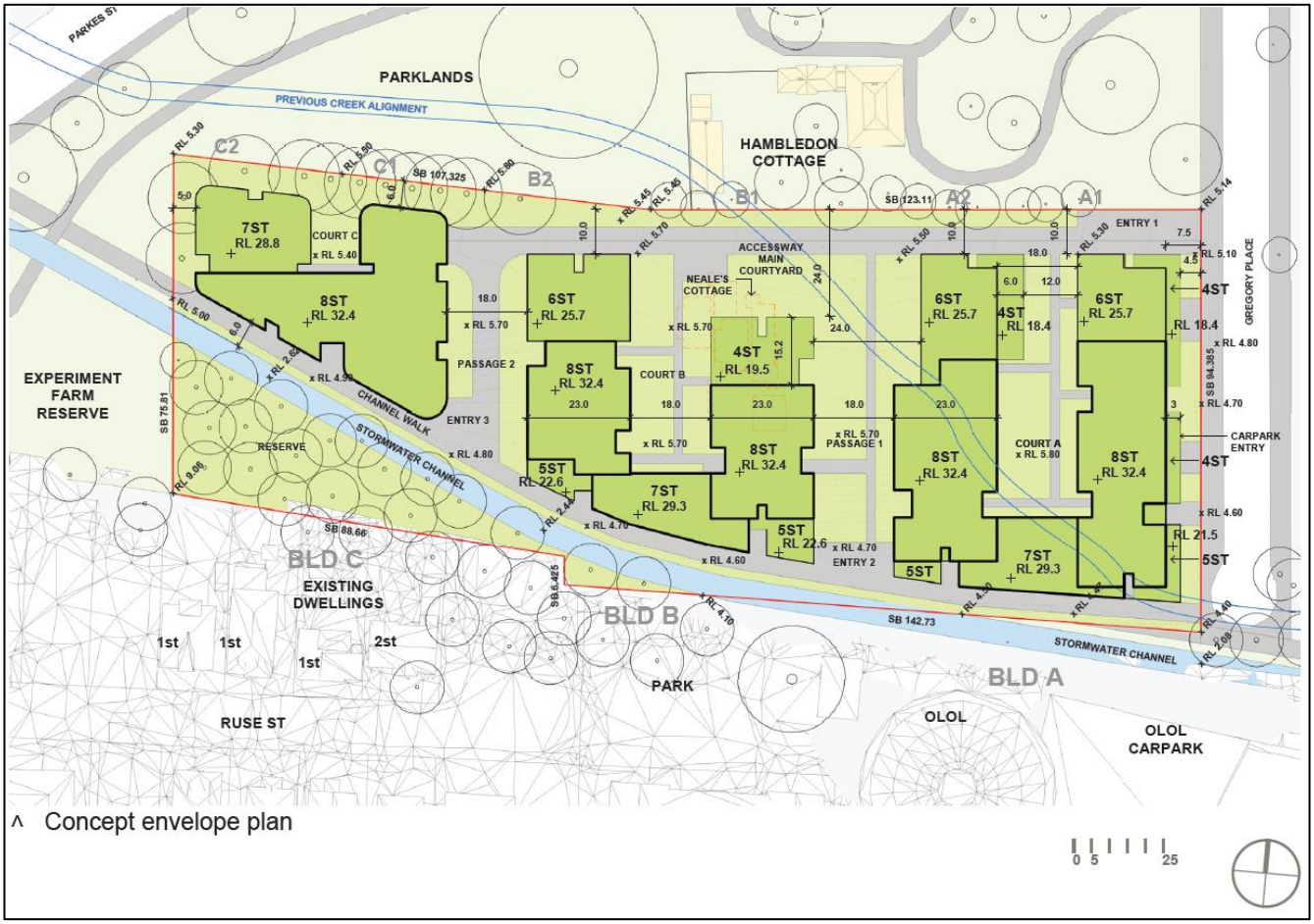


Figure 2: Concept Envelope Plan (source: Stanisic Architects Design Report)

The concept DA will facilitate the development of a residential apartment development 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 10,210m² (52.4%) of landscaped area on the ground plane, comprising courts, passages, accessways, parks and the Clay Cliff Creek channel walk. The project includes approximately 483 dwellings (of which 50% are affordable housing) with 48,685sq.m of total gross floor area at an FSR of 2.5:1.

Figure 3: Illustration from Gregory Place (source: Mark Gerada)

Consultation and Engagement

The SEARs require detailed engagement be undertaken to demonstrate how it was consistent with the *Undertaking Engagement Guidelines for State Significant Projects*. Detail how issues raised, and feedback provided have been considered and responded to in the project.

To seek stakeholder input into the concept DA, community and stakeholder engagement was undertaken by Forward Thinking between 25 April and 15 June 2022. The engagement has been conducted in line with the methodology and requirements outlined in the Department of Planning and Environment *Undertaking Engagement Guidelines for State Significant Projects, 2021*, and a summary of the methodology, findings and proponent response has been dealt with and addressed in detail under Section 5 of this EIS.

The direct engagement included the following:

- Department of Planning and Environment
- Parramatta City Council
- Our Lady of Lebanon Cathedral
- Maronite College of the Holy Family

- Local Real Estate Agent
- Parramatta Chamber of Commerce
- Indian community representatives
- Parramatta & District Historical Society
- KamilaroiYankuntjatjara Working Group (Indigenous community group)

Forward Thinking have also conducted the Social Impact Assessment (SIA) for the concept DA and the two processes have usefully informed one another. The SIA report provides an additional level of detail around social impacts and proposed mitigation measures for the site and can be read in conjunction with the Engagement Report.

Impact Assessment

This EIS has assessed the likely positive and negative economic, social and environmental impacts associated with the project. These are summarised below:

Economic

The direct expenditure of $127.3 million results in 340 jobs created in the construction sector in the Parramatta LGA. Further, it induces another 71 jobs due to the supply chain effect, and then another 21 due to the consumption effect, resulting in 433 jobs in total (direct and indirect).

The construction industry is most impacted, accounting for 354 jobs, while Retail Trade is next with 16 jobs and Transport, Postal and Warehousing and Manufacturing each with 12 jobs created.

The proposal will also facilitate the orderly and economic development of the land.

Social

The proposed development will have a total of 483 apartments. 241 of these will be “affordable” (as defined by the ARHSEPP and the Ministerial guideline which requires a qualified household not spend more than 30% of its gross household income on rent and that rents be a set at a minimum of 80% of the market rent). The median rent for a 2-bedroom apartment was $421 per week in March 2022. The affordable rent on the median 2-bedroom apartment if the 80% rate is applied would therefore be $336.80 per week. With an $84.20 discount per week, the weekly rental benefit for 241 units is $20,292. The annual rental benefit is just over $1 million and the net present value (using a 4 per cent discount rate) of the benefit over 10 years is just over $14 million.

The proposal provides diverse housing options for the community and creates significant open space and through links to foster social interaction and recreation.

Environmental

The built environment has been carefully considered and remodelled through a lengthy and detailed design process led by the cultural landscape within which the site sits. Through detailed workshops and meetings with the Heritage Council Approval Committee, peer review processes with expert architects, and two presentations to the State Design Review Panel, the concept has evolved to provide a landscape led outcome, the responds to the European and Aboriginal heritage, with significant new planting and social benefits.

In terms of the natural environment, it is noted that early study found that there was no threatened species on the site and tree removal was focussed to items of no value (generally exempt species). Where

opportunities to retain vegetation has occurred, this has been applied (generally on-site edges). The proposal seeks significant new planting to ensure the development sits within a landscape setting and is screened from certain viewpoints.

Further, a BDAR waiver was issued on 22 June 2022, confirming that "*the proposed development is not likely to have any significant impact on biodiversity values and therefore a Biodiversity Development Assessment Report is not required*".

Any items that emerge through the development process following determination of the concept application can be suitably managed.

Justification

This EIS provides a detailed assessment of the proposed build-to-rent and affordable housing concept application in accordance with the SEARs issued for the project issued on 28 April 2022, for the subject site.

The proposed concept is assessed against the statutory and strategic planning framework and provides an environmental assessment of the concept proposal in terms of the relevant matters for consideration under Section 4.15(1) of the Environmental Planning & Assessment Act 1979.

This EIS has assessed the likely positive and negative economic, social, and environmental impacts associated with the project, the suitability of the site for the proposed development and whether the concept is in the public interest.

Overall, the concept proposal is considered appropriate for the following reasons:

- The proposal is consistent with the local strategic planning framework and is consistent with the conditions of the site compatibility certificate.
- The proposal will facilitate a significant amount of affordable housing within a strategic location close to transport, jobs, goods and services, entertainment and education.
- The site is a decaying industrial factory not suitable to the location. The site is in need of urban renewal and has been identified for residential in the local strategic planning framework and supported for residential flat development by the NSW Government through the site compatibility certificate.
- The proposal will facilitate the orderly and economic development of the land.
- The proposal will create over 10,000sq.m of landscaped areas within the site, a significant amount compared to the existing situation. This includes courtyards, walkways, through links for the broader community, and numerous roof top open spaces for the local community. This has benefits that encourage social interaction and recreation.
- The concept has been through a detailed design process led by the cultural landscape within which the site is located.
- The proposal creates significant construction jobs in the short term and long-term benefits for the local Parramatta economy.

1. Introduction

This Environmental Impact Statement (EIS) has been prepared by Pacific Planning Pty Ltd on behalf of 2A Gregory Place Pty Ltd in support of a State Significant Development Application (SSDA) for a build-to-rent residential development with 50% affordable housing managed by Pacific Community Housing.

The application seeks consent for concept approval in accordance with the provisions of section 4.21 and 4.22 of Part 4, Division 4.4 Concept development applications of the Environmental Planning and Assessment Act 1979 (EP&A Act) in relation to a proposed concept design for land located at 2A Gregory Place, Harris Park.

The project is classified as SSD as it comprises development for the purpose of '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, pursuant to Clause 27 of Schedule 1 of State Environmental Planning Policy (Planning Systems) 2021.

The concept DA will facilitate the development of a residential apartment development 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 10,210m² (52.4%) of landscaped area on the ground plane, comprising courts, passages, accessways, parks and the Clay Cliff Creek channel walk. The project includes approximately 483 dwellings (of which 50% are affordable housing) with 48,685sq.m of total gross floor area at an FSR of 2.5:1.

This EIS has been prepared in response to the SEARs issued on 28 April 2022 (refer to Appendix A for SEARs Compliance Table). The report describes the site, its context and existing environment. It also outlines the proposal, the project justification, includes assessment of compliance with the statutory and strategic planning framework, and provides an environmental assessment of the concept proposal in terms of the relevant matters for consideration under Section 4.15(1) of the EP&A Act.

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. Further applications for development will be prepared following the consideration and determination of the concept application.

This report has been prepared in consideration of Appendix B to the state significant development guidelines, *Preparing an Environmental Impact Statement* released in December 2021.

The EIS is structured as follows:

1. Introduction to the project
2. Key strategic issues that are relevant to the assessment of the project
3. Description of the project
4. Identification of the relevant statutory requirements for the project
5. A summary of the findings of community engagement
6. A detailed summary of the results of the assessment of the potential impacts of the project.
7. A justification and evaluation for the project as a whole, having regard to the economic, environmental and social impacts of the project and the principles of ecologically sustainable development.

This EIS should be read in conjunction with all supporting documentation appended to this report at Appendix A - Appendix OO.

1.1 Proposal Overview

Applicant details	2A Gregory Place Pty Ltd
ABN	42 084 560 789
Address	2A Gregory Place, Harris Park, 2150
Legal Description	Lot 2 in DP 802801
Site Area	19,480sq.m
Community Housing Provider	Pacific Community Housing Pty Ltd
Project	To develop a residential apartment development 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 10,210m² (52.4%) of landscaped area on the ground plane, comprising courts, passages, accessways, parks and the Clay Cliff Creek channel walk. The project includes approximately 483 dwellings (of which 50% are affordable housing) with 48,685sq.m of total gross floor area at an FSR of 2.5:1.
Local Government Area	City of Parramatta
Locality	Harris Park
Current Zoning	IN1 General Industrial
Permissibility	The site is zoned IN1 General Industrial, under which "Residential flat buildings" are prohibited under the Parramatta LEP 2011. 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. 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 1 for the development of a *"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".*
Indicative Capital Investment Value	$147,011,306 Refer to QS Report at Appendix I.

Table 1: Project Overview

1.2 Vision and Objectives

As discussed in the attached Design Report prepared by Stanisic Architects, the vision and objectives for the project are as follows:

The vision for the development is to create a breathing, living environment that is responsive to the sun, light, air and outlook that complements its residential parkland setting and rich cultural history.

The existing site is blighted industrial land that has the potential to be made much better in many respects. The- proposed development is a large project that is embedded in being different to its context, while also being compatible. Most importantly, the site able to better Connect with Country.

The site is located within a rich cultural landscape that has been occupied for many thousands of years and physically transformed following colonialisation and later with multiculturalism. It has evolved into a distinctive place that is a special sub-precinct, an island that is defined by a parkland landscape to the north, stormwater channel to the south with only one street interface.

The existing industrial uses on the site are now redundant and there is an opportunity to rejuvenate it for residential occupation to take advantage of its prime location and excellent amenity. In doing so, there is an added responsibility to balance the relationship between density and social outcomes economics, environment and social benefits. Density should be located on good land with good amenity in order to contain urban sprawl and it should be offset by creating a high-quality and connected public domain.

While respecting the significant colonial history of the four key state heritage register listings (Hambledon Cottage, Elizabeth Farm and Experiment Farm) and Parramatta Sand Body to the north, any significant development also has an obligation to Care for Country. Acknowledging the history pre-contact as well as contemporary stories, provides a deeper understanding of our history and develops our thinking of Australia as a Country. This can be achieved by embedding place into the interpretation of the built form and significant open space, and by permitting pedestrian movement through the site once again. Furthermore, there is also an opportunity to make a strong sustainable commitment towards the future.

1.3 Proposed Development Overview

The concept proposal has been developed from a deep understanding of the site and its context. The architectural concept is for three freestanding 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, in 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 application seeks consent under section 4.22 of the Environmental Planning & Assessment Act 1979 (EP&A) 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.

The concept will facilitate the future development of the site in a staged process and incorporating the following:

- approximately 483 dwellings across a total of 48,685sq.m of total gross floor area,
- three (3) freestanding building forms that are arranged into an orthogonal layout of five fingers,
- heights ranging from 4-8 storeys,
- approximately 13,210m² (67.10%) of landscaped area on the ground plane, comprising courts, passages, accessways, parks and the Clay Cliff Creek channel walk.

Figure 4: Concept Envelope Plan (source: Stanisic Architects Design Report)

1.4 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 the City 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 are illustrated in Figure 5 below.

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 2009 (now Housing SEPP 2021). The SCC application was lodged in December 2016.

Figure 5: Concept Design 2015 (*Source: Stanisic Architects*)

1.4.1 Site Compatibility Certificate

The ARH SEPP (now Housing SEPP 2021) 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 SCC to the department 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 SCC was issued by the department.

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 was held on 2 March 2021, of which the Heritage Council Minutes supporting the progression of the project to Stage 1 DA is included at Appendix F.

Further, in relation to condition 1 above, PCH will provide community housing in their capacity as a registered tier three CHP 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.

1.4.2 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.

Figure 6: Aerial photo of subject site (source: sixmaps)

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 if this meeting are included at Appendix F, 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. The primary design responses have been adopted to inform the current concept being considered through the (SSD process and advanced under Division 6A Build-to-rent housing of the ARH SEPP.

1.5 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 2021 that included expert input to the project.

Alec Tzannes of Tzannes Associates and Otto Cserhalmi of OCP Architects assisted with the development of the concept through a series of workshops and collaborative reviews. The purpose of the peer review process was "*to review the draft proposal prepared by the design team and provide high-level comment in relation to a Concept Development Application*".

The review process allowed for design testing to balance the need to achieve a level of density in the scheme to maintain economic viability that supports the social benefits outcomes of reduced-cost affordable rental housing, the impact on the heritage landscaped setting, proposed built form, amenity and sustainable framework for the development. Three workshops were held over a number of months, with guiding comments recorded in memory aids. Key comments/recommendations have been incorporated into the design that has informed the concept layout and discussed further in this report.

The key design outcomes of the peer review are discussed in detail in the attached architectural report and also under Section 6.2.1 of this EIS.

1.6 State Design Review Panel

To date, two presentations have been held with the SDRP on 9 December 2021 and 25 May 2022.

A detailed and comprehensive response table has been prepared by the project team and is included at Appendix C. The table won't be reproduced here to avoid repetition, and the presentations and details on the design responses in included at Section 6.2.3.

1.7 Pacific Community Housing

PCH is a registered CHP guided by a mission statement that seeks to promote and provide access to safe and secure affordable housing in Sydney for those that require it.

By application of the mission, PCH seeks to provide longer and stable term housing tenancies to support those on lower and moderate incomes .PCH seek to reduce living costs of housing, so tenants can have opportunities for life choices to advance to their personal best and have opportunities to enjoy the community where the choose to live.

PCH projects are specifically targeted to leverage off planning law that seeks to incentivise and deliver socially sustainable housing. PCH links with private sector assets and investment to the affordable and social housing sector.

PCH works with its partner clients to seek and advance opportunities to supply increased project value through the delivery of social benefits in projects. The project at 2A Gregory Place is the second of PCH's larger projects in western Sydney. The project will:

- Provide a minimum of 50% of the dwelling yield as affordable housing in line with the Ministerial Guide.
- Be guided by specialist social planning study to ensure dwelling typology is targeted to the social need of this community.
- Will be designed to enhance sustainable living costs through good design, material selection, energy efficiency to reduce project life cycle maintenance costs.
- Seek to enhance social cohesion, walkability and connection to new transport, employment and education opportunities.
- Seek to deliver new open space areas for residential and community enjoyment.

The appointment of PCH has been made as the relevant social housing provider pursuant to Schedule 2 of the SCC, and a letter of appointment and commitment from Pacific Community Housing is included at Appendix G.

1.8 Development Staging

The project seeks development consent for a concept DA initially seeking concept proposal approval under the provision of Section 4.22 of the EP&A Act 1979. Subsequent staged DAs containing detailed design will be submitted under separate cover.

Figure 7 below, outlines the proposed future staging of the project that will be subject to future applications for development.

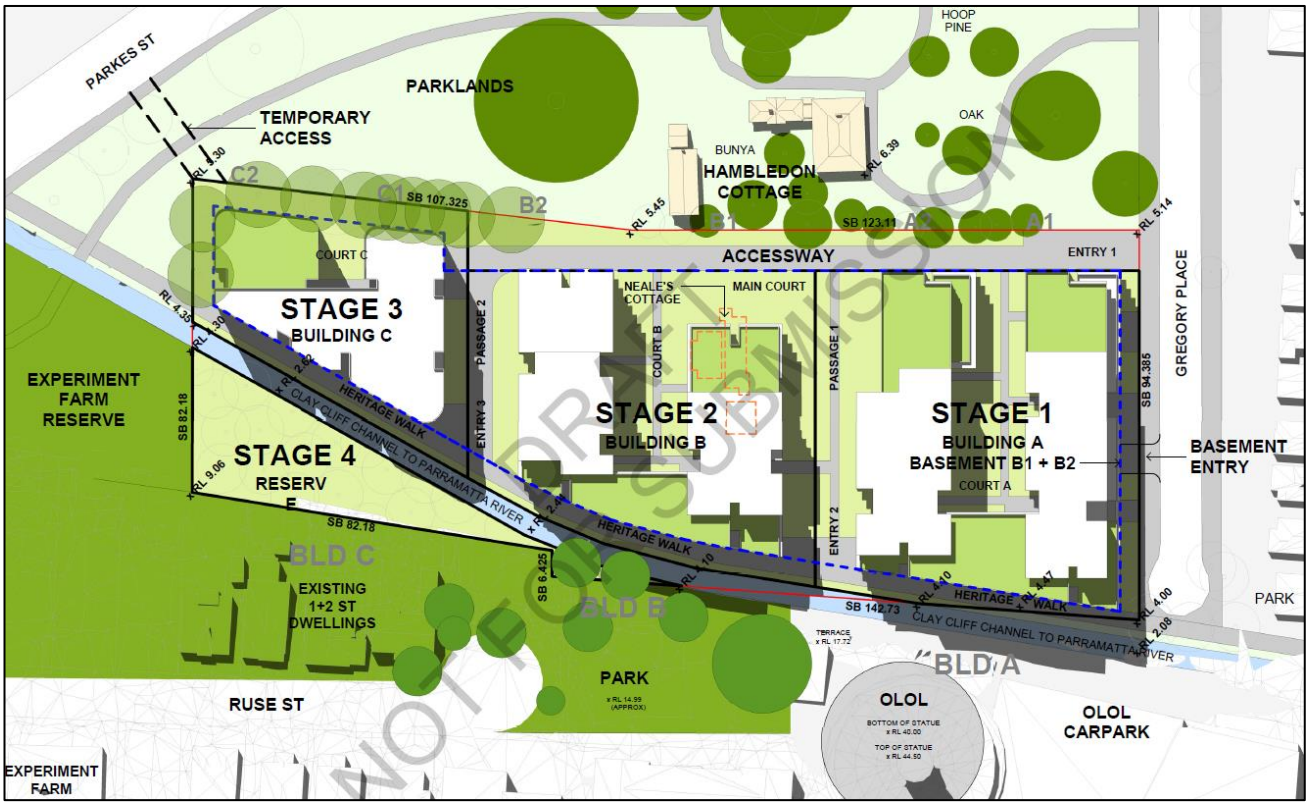


Figure 7: Staging Plan

1.9 Preliminary Consultation

Forward Thinking has undertaken a comprehensive stakeholder engagement process and report. Community and stakeholder engagement was undertaken between 25 April and 15 June 2022.

Key stakeholder consultation included the City of Parramatta Council, NSW Government Agencies and key community representatives, and also included a community letterbox drop, a community survey, a community phone line and e-mail and an indigenous consultation session.

A summary of the consultation and outcomes is included at Appendix NN. A detailed summary of the findings and outcomes of the consultation is included within this EIS at Section 5.

1.10 Feasible Alternatives

The provisions of Clause 192 of the *Environmental Planning and Assessment Regulation 2021* requires an analysis of any feasible alternatives to the carrying out of the development, including the consequences of not carrying out the development.

Alternative options are included below:

Option	Assessment
Do nothing	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. The industrial use is now redundant and does not compliment the setting within which the site sits. An alternative use that responds to the setting, surrounding residential and open space, and most importantly sensitive heritage context of the locality is desirable. Further, doing nothing would result in the underutilisation of the site in its context near the Parramatta CBD. Therefore, doing nothing, is not an option, is not the best outcome for the site and is inconsistent with the strategic planning framework.
Industrial Development	A new industrial development on the site is not desirable. The site is identified for future residential under Parramatta's Employment Lands Strategy and an industrial development would not be compatible with its surroundings, including the local heritage significance and open space. Therefore, given industrial development, while permissible, is not consistent with the envisaged future strategic planning process, it is considered that this is not a desirable option.
Original Design	At the time of the original design in 2015, 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 design was based on the need to maintain or reinstate historic view corridors between the three key heritage items, Parramatta River and the Female Orphan School and the ridgeline. The scheme therefore was developed specifically to respond to the visual connections which didn't really connect with the context of the site, especially given the reality that the actual view cones were impacted by existing built form between the items. The original design was submitted to the Department, who in issuing a site compatibility certificate for the site, required consultation with the Heritage NSW and the HCAC. Through this process, it was considered that the original scheme was not the best option for the site given the sensitivities surrounding the site, the landscaped context and the fact that the view corridors no longer existed. Subsequently the original scheme was abandoned, and workshops continued with the HCAC, in addition to a peer review process with Alec Tzannes and presentations with the SDRP. In this context, reverting to the original scheme would be inconsistent with the work undertaken with the relevant bodies and experts.
Alternative Building Designs	The concept process has been subject to a rigorous design process as mentioned above. There has been a significant shift from the original layout, developed with council (radial scheme with visual corridors between colonial Heritage Items) to a scheme that is embedded with Caring for Country and better connecting with the context. As a result of consultations with the HCAC, peer review panel and the SDRP the existing concept has been advanced, which satisfies the condition of the site compatibility certificate.

Table 2: Project Alternatives

2. Strategic Context

2.1 Site Description

The land to which this concept DA applies is located at 2a Gregory Place, Harris Park and has a legal description of Lot 2 in DP 802801. The subject site comprises one lot and is known legally as follows:

Address	Lot details	Area (m²)
2a Gregory Place	Lot 2 DP 802801	19,480
Total Area		**19,480**

Table 3: Site description

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 8: Site Identification Plan

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.

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 site is zoned IN1 General Industrial under the LEP. development for the purpose of a 'residential flat building' is prohibited in the IN1 General Industrial zone.

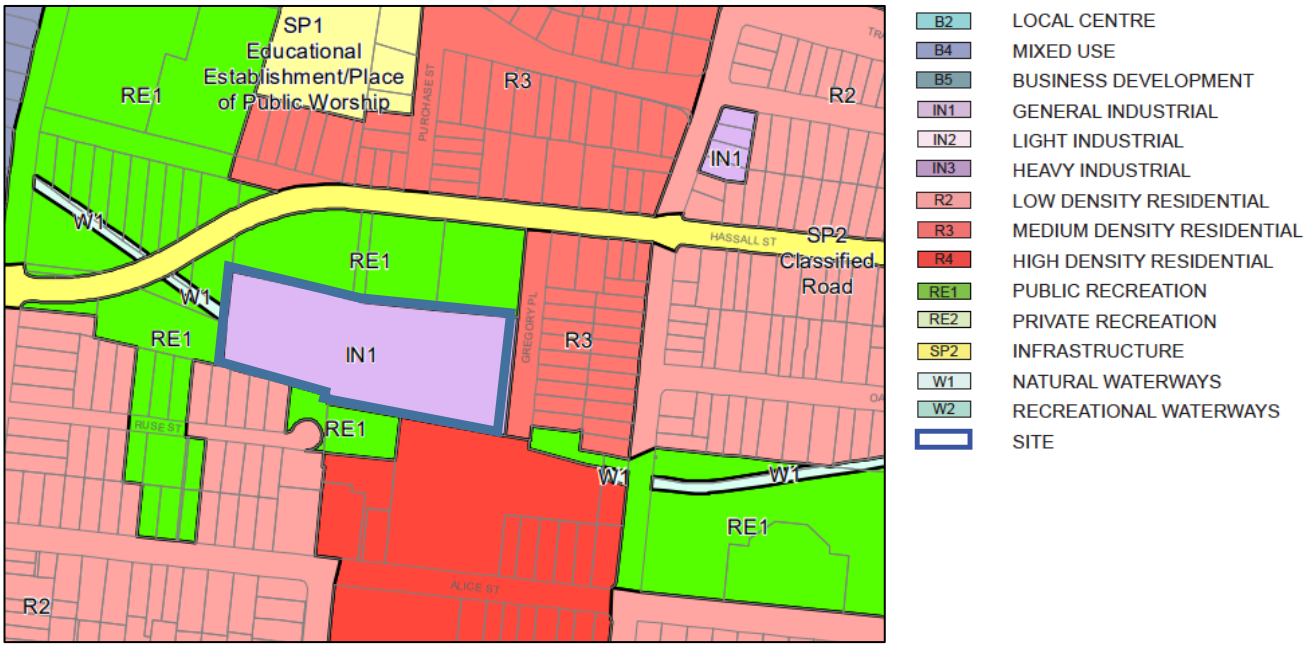


Figure 9: Parramatta LEP 2011 Land Zoning Map

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 10: Existing factory from western boundary

Figure 11: Existing factory directly behind Hambledon Cottage

Figure 12: View looking at existing industrial building from Hassall Street

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 at the eastern end 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. OLOL 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.

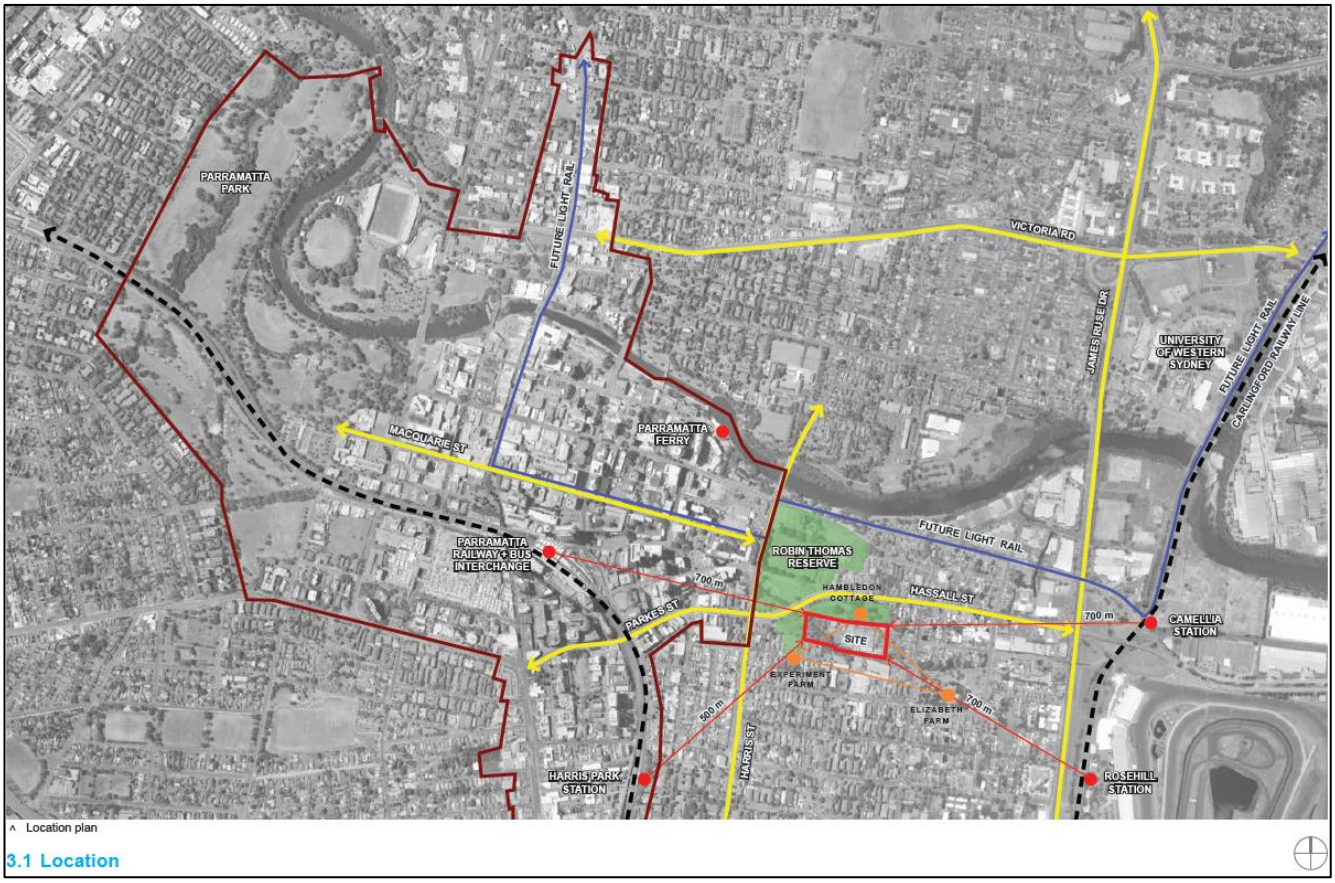


Figure 13: Location Plan

2.3 Strategic Justification

2.3.1 *Premier's Priorities*

The Premier's priorities represent the government's commitment to making a significant difference to enhance the quality of life of the people of NSW.

The Premier's Priorities aim to tackle many of the issues that have been put in the too hard basket, for too long. Each priority has an ambitious target. They have been set with the purpose of delivering on the government's key policy priorities, being:

- a strong economy
- highest quality education
- well-connected communities with quality local environments
- putting customer at the centre of everything we do
- breaking the cycle of disadvantage

The following considers priorities relevant to the proposal:

Greening our City
Increase the tree canopy and green cover across Greater Sydney by planting 1 million trees by 2022.
A key design principle for the project is to ensure that the future development fits within its landscaped setting. Considerable thought and work have been undertaken to landscape the site amongst the building footprints. A detailed landscape plan has been prepared to illustrate how the proposed courtyards, creek walkway, pedestrian through links and open spaces will be vegetated and how the development will increase the tree canopy within its setting.

Greener Public Spaces
Increase the proportion of homes in urban areas within 10 minutes' walk of quality green, open and public space by 10% by 2023
The site is located within a landscape setting. It is surrounded by a number of open spaces, providing further access for future residents to adjoining open space. Hambledon Cottage Reserve is located to the north, Experiment Farm Reserve is located to the west and James Ruse Reserve and associated playground is located to the north west. This, in conjunction with the significant open space and landscaped areas associated with the site and discussed above, provides significant access of new homes to quality green and open spaces.

Reducing Homelessness
Reduce street homelessness across NSW by 50% by 2025
The concept application seeks to facilitate a build-to-rent scheme with significant provision of affordable housing to support low to moderate income families and singles and ensure people under housing stress have access to housing. Pacific Community Housing are the relevant housing provider that will support and provide housing and assist meet the Premier's Priority to reduce housing stress for those most in need.

2.3.2 Future Transport 2056

The NSW Future Transport Strategy 2056 sets the 40-year vision, directions and principles for customer mobility in NSW, guiding transport investment over the longer term. It presents a glimpse of the large economic and societal shifts NSW will see in the future and places the customer at the centre, to ensure the transport system responds to rapid changes in technology and innovation to create and maintain a world-class, safe, efficient and reliable transport system.

The Future Transport 2056 Strategy is focused on six principles for the future of mobility in the State, which together aim to positively impact the economy, communities and environment of NSW. Achieving these principles has underpinned every planning decision in the development of the Future Transport 2056 Strategy.

Principles, objections and actions relevant to the project include the following:

Successful places
Vision: The liveability, amenity and economic success of communities and places are enhanced by transport.
The concept seeks to deliver new public spaces and through links better connecting the site and broader area to its surroundings, including the nearby transport infrastructure, including railway stations, light rail stops and ferry terminals. In doing so, the project provides better access to walking, cycling (cycling parking within the development) and public transport, encouraging people to be more physically active, improve mental health and increase social interactions and recreational opportunities in communities.

A 30-minute city

Vision: Living in a '30-minute city' will mean residents can access jobs and services in their nearest metropolitan or strategic centre within 30 minutes by public transport, walking and/or cycling, seven days a week. This will give people better access to jobs, education and essential services and give people more time back in their days.

The site is within short walking distance from the Parramatta CBD, connecting residents to a range of opportunities including jobs and services. Further, Harris Park and Parramatta train stations are in close walking distance as is the new Parramatta light rail service and the existing ferry terminal at Parramatta. This provides further opportunities to access other parts of Sydney via public transport within the 30-minute target.

2.3.3 Greater Sydney Region Plan – A Metropolis of Three Cities

In March 2018, the NSW Government published A Metropolis of Three Cities – The Greater Sydney Region Plan (The Plan). The Plan is built on a vision of three cities where most residents live within 30 minutes of their jobs, education and health facilities, services and great places. This is consistent with the 10 Directions in Directions for a Greater Sydney which establish the aspirations for the region over the next 40 years and are a core component of the vision and a measure of the Plan's performance.

To meet the needs of a growing and changing population the vision seeks to transform Greater Sydney into a metropolis of three cities:

- the Western Parkland City
- the Central River City
- the Eastern Harbour City.

The site is located within the Central River City. The population of the Central River City is projected to increase from 1.3 million people to 1.7 million people over the next 20 years.

The Plan projects the population of Greater Sydney to grow to 8 million over the next 40 years. The Plan seeks to rebalance the economic and social opportunities and leverage that growth and deliver the benefits more equally across Greater Sydney. The goals are for:

- residents to have quick and easy access to jobs and essential services;
- housing supply and choice to increase and meet the growing and changing needs of the community;
- the environment and precious resources to be protected; and
- Infrastructure to be sequenced to support growth and to be delivered concurrently with new homes and jobs.

To achieve the objectives for the Central River City, the plan includes 10 directions and 40 objectives, supporting actions and priorities for each "City".

1. A city supported by infrastructure
2. A collaborative city
3. A city of people
4. Housing the city
5. A city of great places
6. A well-connected city
7. Jobs and skills for the city
8. A city in its landscape
9. An efficient city
10. A resilient city

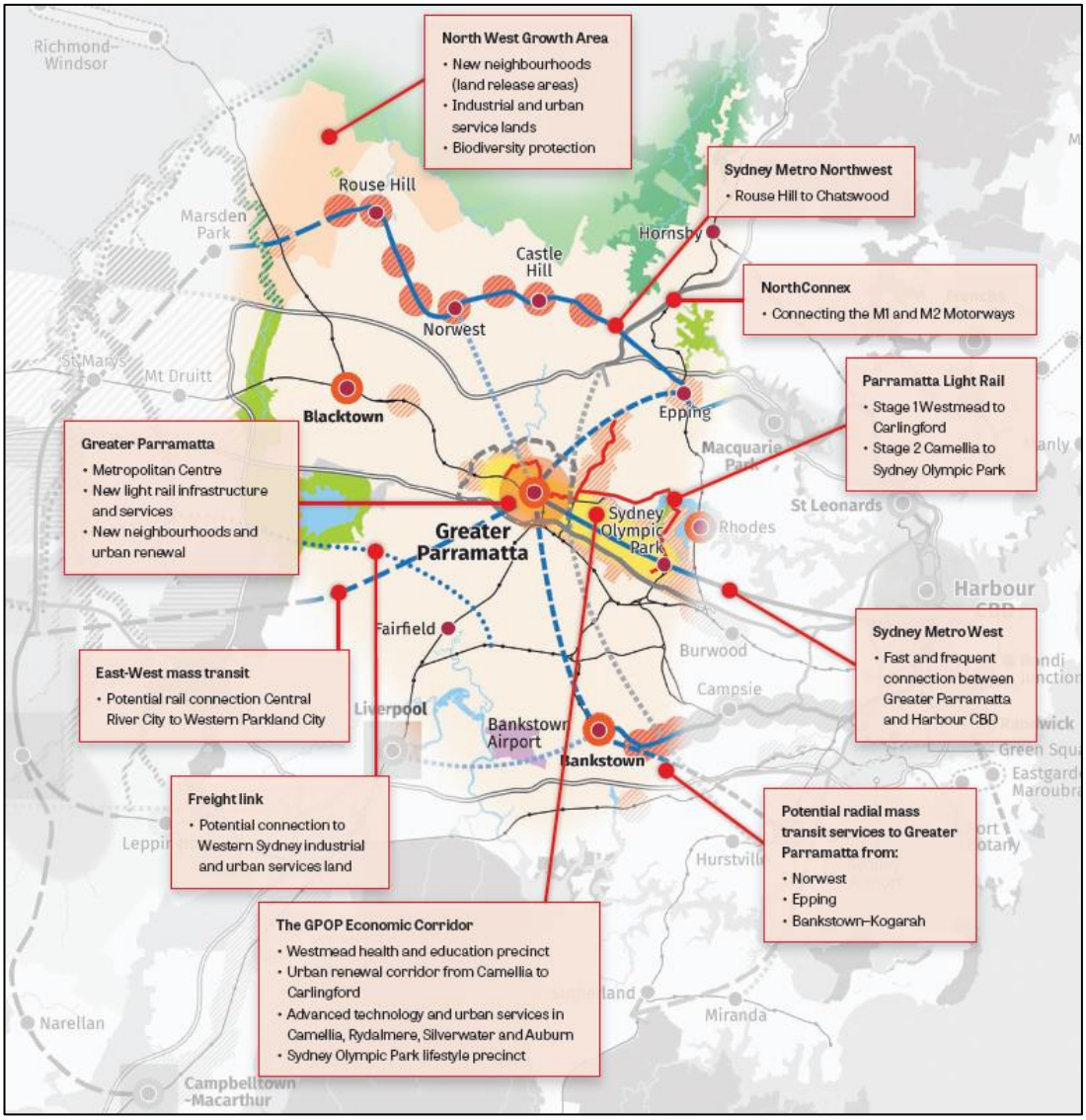


Figure 14: Central River City Structure Plan

To improve liveability, the plan seeks to create new great places, with well-connected communities which have access to a range of jobs and services, starting with public places, open spaces and transit-oriented developments. The concept application seeks to facilitate the provision of affordable and rental housing, within a landscaped setting, close to public transport, jobs and services within the Parramatta CBD and Greater Sydney.

Direction 4 "Housing the City" of the Greater Sydney Plan seeks to provide housing choice for people, which can be achieved through "greater housing supply", "increased housing completions" and "more diverse and affordable" housing. The concept application seeks to deliver the future development of diverse housing to support the needs of the community, in terms of affordability, liveability, and accessibility.

Further, Direction 6 "A well connected City" of the Greater Sydney Plan seeks to integrate land use and transport to support the 30-minute city. The 30-minute objective states:

> *"A 30 – minute city is where most people can travel to their nearest metropolitan centre or cluster by public transport within 30 minutes; and where everyone can travel to their nearest strategic centre by public transport seven days a week to access jobs, shops and services".*

The site is within the 30-minute city objective. The site is within a highly accessible area, close to significant public transport, jobs and services, and well connected to Sydney and broader Greater Sydney. The site is approximately 700 metres from Parramatta, Harris Park, 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.

The site is also just outside the Parramatta CBD, which is identified as a metropolitan centre, being the core of the Central River City, and a key area to support delivery of new homes within 30 minutes of employment, education, and green spaces.

The proposal, while only a concept, achieves many of the objectives of the Plan, such as creating healthy, resilient and socially connected communities (Objective 7), increasing housing supply (Objective 10), increasing more diverse and affordable housing (Objective 11), and supporting the growth of Greater Parramatta to become stronger and better connected (Objective 19).

2.3.4 Central City District Plan

Greater Sydney's three cities identified in the Greater Sydney Region Plan – A Metropolis of Three Cities reach across five districts. The Central City District is forecast to grow substantially, capitalising on its location close to the geographic centre of Greater Sydney. It incorporates the local government areas of The Hills, Blacktown, Parramatta and Cumberland.

Greater Parramatta – the metropolitan centre – is the core of the Central River City and Central City District. Its economy is centred on world-class health, education and research institutions as well as finance, business services and administration. Greater Parramatta and the Olympic Peninsula (GPOP) – taking in the Westmead health and education precinct; advanced technology and urban services in Camellia, Rydalmere, Silverwater and Auburn; and the Sydney Olympic Park lifestyle precinct – will be supported by the Parramatta Light Rail and Sydney Metro West.

The Central City District Plan was released in March 2018 to set the priorities and actions for improving the quality of life for residents as the district grows and changes.

> "*The vision for Greater Sydney as a metropolis of three cities means residents in the Central City District will have quicker and easier access to a wider range of jobs, housing types and activities as part of the transformation of their District. The vision will improve the District's lifestyle and environmental assets.*

In undertaking strategic planning processes, and/or preparing or considering planning proposals, planning authorities must give effect to the District Plan, specifically the Planning Priorities and Actions. While this application is not for development, it does seek consent for a concept on the site that will be realised in the future through subsequent DA's.

The concept application implements the directions and priorities of the Central District Plan through the provision housing supply, choice and affordability, with access to jobs, services and public transport. The following priorities are relevant:

- Planning Priority: N3: Providing services and social infrastructure to meet people's changing needs.
- Planning Priority N4: Fostering healthy, creative culturally rich and socially connected communities

- Planning Priority N5: Providing housing supply, choice and affordability, with access to jobs, services and public transport.
- Planning Priority N6: Creating and renewing great places and local centres, and respecting the District's heritage.
- Planning Priority N9: Delivering integrated land use and transport planning and a 30-minute city.

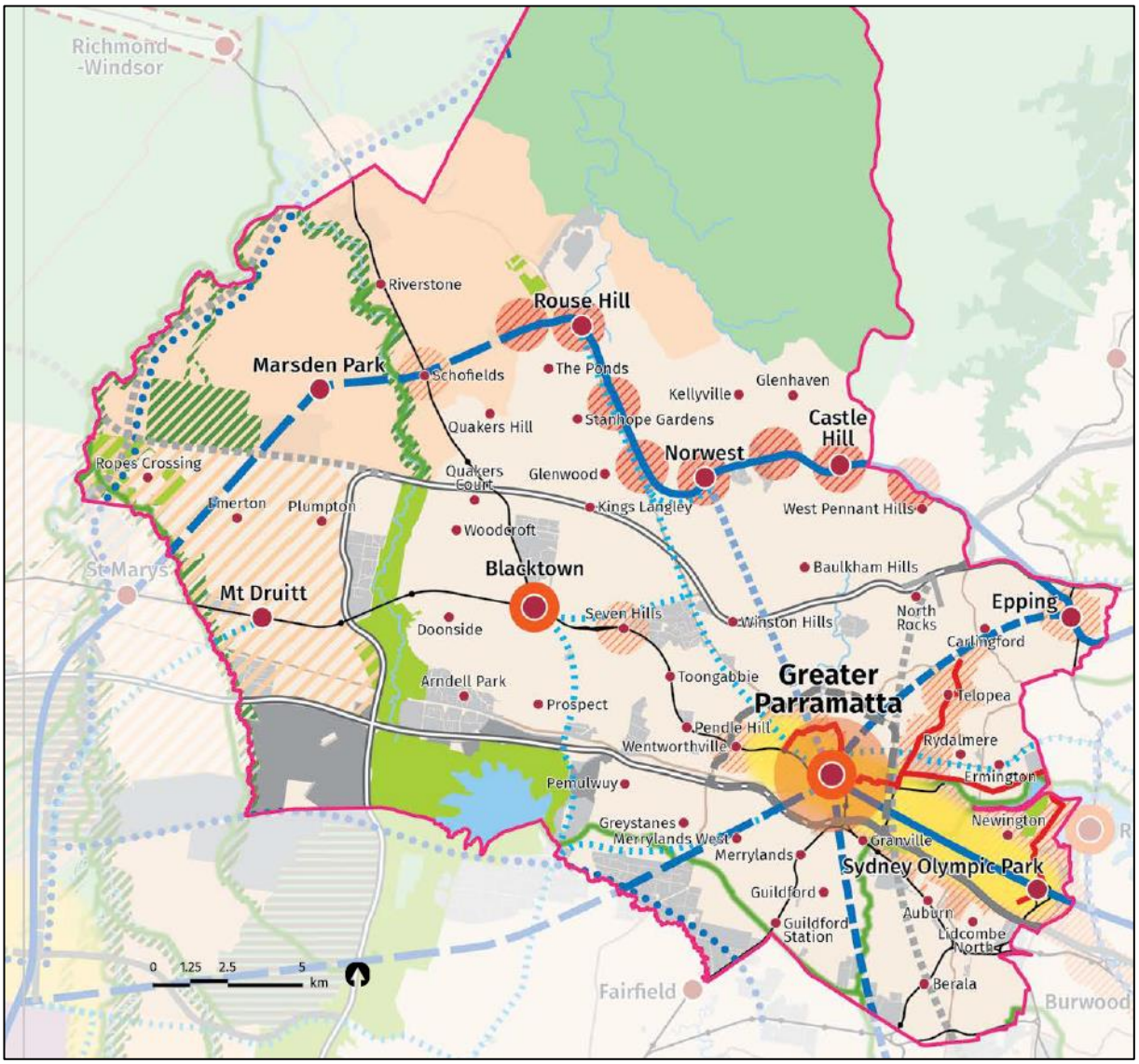


Figure 15: Central City District Structure Plan

2.3.5 *Greater Parramatta and Olympic Peninsula*

The subject site is located within the Harris Park Precinct of the Greater Parramatta and the Olympic Peninsula (GPOP). GPOP is a 6,000-hectare area at the core of the Central City, and the centre of Greater Sydney. It spans 13 km east-west from Strathfield to Westmead, and 7 km north-south from Carlingford to Lidcombe and Granville.

The vision for GPOP over the next 20 years is for a city and urban hub at Greater Sydney's heart being a major generator of new jobs and housing in the future. For GPOP to reach its potential it must become more liveable, productive and sustainable as it grows.

Starting with the vision for GPOP, the 18-month PIC Pilot developed four realistic scenarios over 10, 20- and 40-years based on expected jobs and housing growth, and infrastructure and services to support them. The 'Transformative' scenario was chosen to develop a draft sequencing plan and proposed infrastructure priorities for GPOP, to help shape the area as it grows, starting with the next 10 years.

The site falls under proposed action 3, which seeks to maintain existing activities. However, the subject site is zoned industrial, is in decay and underutilised, and has been identified for urban renewal in accordance with the site compatibility certificate and local strategic planning framework.

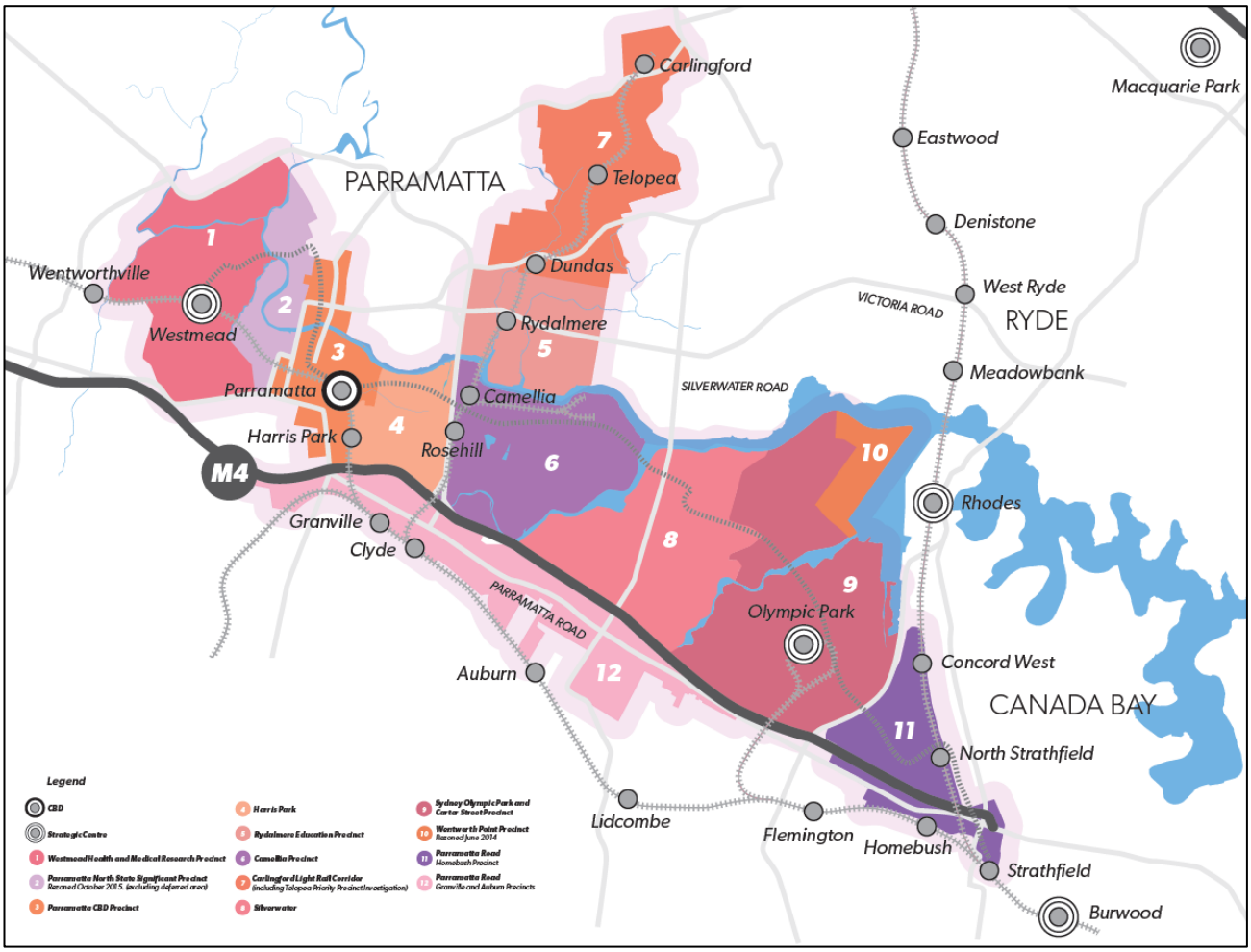


Figure 16: Greater Parramatta Master Map

2.3.6 *Parramatta Local Strategic Planning Statement*

The Parramatta Local Strategic Planning Statement (LSPS) provides the direction on how the City of Parramatta is planning for the next 20 years drawing together r the needs and aspirations of the community and identifies priorities for jobs, homes and infrastructure. The LSPS looks at the role of Parramatta as part of Greater Sydney and seeks to achieve a future which is sustainable, liveable and productive.

The vision of the Parramatta LSPS is that *"In 20 years Parramatta will be a bustling, cosmopolitan and vibrant metropolis, the Central City for Greater Sydney. It will be a Smart City that is well connected to the region, surrounded by high quality and diverse residential neighbourhoods with lots of parks and green spaces. It will be innovative and creative and be well supported by strong, productive and competitive employment precincts. It will be a place that people will want to be a part of."*

The LSPS provides a number of Priorities, Directions and Actions to implement the vision and strategy for Parramatta's growth.

The LSPS observes that 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. It is clear therefore that housing diversity is a key priority of the Strategy. This is supported by the Liveable Planning Priorities, which among other things seek to focus on the following:

- Housing diversity
- Affordable housing
- Enhancing the City's rich heritage and culture
- Provide new open space through precinct planning
- Access to infrastructure

While Planning Priorities 7 and 8 are particularly relevant to the housing choice and diversity presented by the development, all are essentially relevant:

Liveable Planning Priorities		
No.	Planning Priority	Consideration
PP7	Provide for a diversity of housing types and sizes to meet community needs into the future	The proposal is for a built-to-rent scheme that provides a significant proportion of affordable housing. While the application is at concept stage, indicative dwelling types have been suggested which provides for a diversity of housing, supporting key workers, singles, those under housing stress, and those with disabilities.
PP8	Incentivise affordable rental housing delivery and provide for permanent affordable housing	The application is facilitated by the provisions and incentives of the Affordable rental housing SEPP 2009 (now Housing SEPP), which seeks to enable housing in strategic locations for the purpose of affordable housing where this may not have been realised under existing planning controls. Unser Division 5 of the SEPP, a site compatibility certificate has been issued to enable the development of residential flat development provided 50% of dwellings are realised as affordable housing for a minimum of 10 years. The application, following years of study and consultation with the relevant agencies, seeks to realise the terms of the certificate.
PP9	Enhance Parramatta's heritage and cultural assets to maintain our authentic identity and deliver infrastructure to meet community needs	The site is in a sensitive location being close to numerous European heritage items, while there is also a historical Aboriginal cultural narrative associated with the site. Considerable work has been undertaken to understand the history of the site and area, and working with agencies and the Aboriginal community, a scheme has been developed that is sensitive to its location while celebrating the Aboriginal culture through landscaping, wayfinding and design.

PP10	Improve active walking and cycling infrastructure and access to public and shared transport	A detailed landscape strategy has been developed over a number of years to ensure permeability and accessibility. The Clay Cliff Creek walk to the south of the concept and the shared way along the northern boundary of the concept provides permeability through the site, the network of open spaces and courtyards provides opportunities for passive recreation along the way. Public transport is just a few minutes' walk, to Parramatta, Harris Park or the light rail to the north, within easy walking or cycling distance. The concept encourages walking and cycling through its focus on the public domain and pedestrian environment.

Table 4: Liveable Planning Priorities under the Parramatta LSPS

2.3.7 Parramatta Local Housing Strategy

The Local Housing Strategy (2020) provides direction on where and when future housing growth will occur to 2036 and beyond, consistent with the strategic priorities on housing contained in the *Central City District Plan*.

The Local Housing Strategy provides the evidence of significant forecasted housing growth, most of which is high-density (apartment) development occurring in growth precincts led by NSW Government agencies or the council. It also sequences this growth based on delivery of key dependencies.

The Local Housing Strategy seeks to implement key Planning Priorities of the Central City District Plan including the following:

- **Planning Priority C3** - Providing services and community infrastructure to meet people's changing needs
- **Planning Priority C5** - Providing housing supply, choice and affordability, with access to jobs, services and public transport
- **Planning Priority C9** - Delivering integrated land use and transport planning and a 30-minute city.

Council's Liveability Planning Priorities discussed above in the LSPS, seek to build on the District Plan and assist implementation through the Local Housing Strategy.

While the site is currently zoned for general industrial development, that is not its desired future use or character. This is evident in the Employment Strategy discussed below. In doing so, and on the assumption that the future use is residential, the concept proposal seeks to deliver housing in accordance with the Housing Strategy, being:

- The concept proposal seeks the urban renewal of an underutilised and deteriorating site in a sensitive location.
- The site is within walking distance of public transport and other infrastructure.
- The concept seeks to deliver affordable rental housing in an incentivised planning framework that assists sustainable economic outcomes.
- The housing proposed is diverse supporting the supply of dwellings for key workers, singles, those with disabilities and those under housing stress.
- The concept seeks to deliver significant landscaped and open space areas.

2.3.8 *Parramatta Employment Lands Strategy*

The vision for Parramatta's employment precincts is contained in both the Employment Lands Strategy (2016) and Employment Lands Strategy – Review and Update (2020).

These strategies provide direction for Parramatta's employment lands zoned B5 Business Development, B6 Enterprise Corridor, B7 Business Park, IN1 General Industrial, IN2 Light Industrial or IN3 Heavy Industrial in *Parramatta Local Environmental Plan 2011*. As the site is currently zoned IN1 General Industrial the Strategy is of relevance to the strategic planning framework.

It is noted that the site is specifically mentioned in the strategic planning framework as a site where a rezoning to residential should be investigated. The following table is extracted from the Employment Lands Strategy – Review and Update July 2020.

Harris Park (Gregory Place) – No. 07	2 ha	Small, isolated, limited industries Zoned IN1	Investigate rezoning to Residential (subject to technical studies)	Site compatibility certificate (SCC) issued for affordable housing. Council submission on SCC did not support proponent's density, instead recommended a density consistent with surrounding housing CCDP in effect Draft PIC exhibited LSPS in effect	Investigation Area. Affordable Rental Housing site with SCC	Residential	Affordable Rental Housing consistent with SCC **Timing:** Dependent on when applicant lodges DA consister with SCC

Figure 17: Extract from Parramatta's Employment Land Precincts

3. Project Description

This section provides a detailed description of the proposal and future staging of the project. The concept proposal drawings and plans are included at Appendix J.

3.1 Proposal Overview

Address	2A Gregory Place, Harris Park, 2150
Site Description	Lot 2 in DP 802801
Area	19,480m².
LGA	City of Parramatta
Zoning	IN1 General Industrial
Permissibility	The site is zoned IN1 General Industrial, under which "Residential flat buildings" are prohibited under the Parramatta LEP 2011. However, on 19 July 2017, SCC was issued by the department under the provisions of Clause 37 of Division 5 of the ARH SEPP. 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 *"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".*
Project Summary	To develop a residential apartment development, containing 50% affordable housing 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 13,210m² (67.10%) of landscaped area on the ground plane, comprising courts, passages, accessways, parks and the Clay Cliff Creek channel walk. The project includes approximately 483 dwellings and 48,685sq.m of total gross floor area at an FSR of 2.5:1.

Concept Plan	This concept DA includes the following:
	• Building footprints and massing envelopes for the future development of the site across 3 x freestanding building forms;
	• Building separations and setbacks;
	• Boundary setbacks;
	• Pedestrian access and open space; and
	• Conceptual identification and location of:
	  ○ Open space/courtyards/reserve and the channel walk along the creek;
	  ○ Vehicular access arrangements and egress points;
	  ○ Indicative basement car parking access locations;

Capital Investment Value	The project is classified as SSD as it comprises development for the purpose of 'build-to-rent housing' with a 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, pursuant to Clause 27 of Schedule 1 of State Environmental Planning Policy (Planning Systems) 2021.

Table 5: Proposal Overview

3.2 Project Objectives

The Proposal seeks the following objectives:

- To establish the building footprints and envelopes to facilitate future DAs for development and construction;
- To facilitate the delivery of a quality residential development that supports urban renewal of a large consolidated site;
- Facilitates the provision of significant affordable housing in an accessible location, close to major transport infrastructure, jobs, employment, services and education;
- Delivers significant open space, courtyards and landscaping;
- To embed development within the parkland setting;
- To embellish and celebrate the clay cliff and associated parallel creek line;
- To acknowledge and foster the first nations history within the development, connecting to country through an understanding of the cultural landscape that envelopes Gregory Place;
- To be sensitive to the historical European heritage surrounding the site, particularly Hambleton cottage to the north;
- To mitigate any flooding impacts associated with the adjoining creek line;
- To create a network of publicly accessible spaces and through site links;
- Balance pedestrian and public spaces whilst ensuring safe vehicle access and traffic solutions; and
- To facilitate a development of a bulk and scale that is compatibility with the existing and future character of the area.

3.3 Placemaking Principles

The following principles have been developed through an evolutionary process to support placemaking and the creation of a sense of place.

1. Connect with Country + interpret colonial + post context heritage
2. Create orthogonal layout, courtyard + fingers
3. Create new main court + 24m setback to Hambledon Cottage (2,800m²)
4. Restore visual connection between Hambledon Cottage + main court
5. Retain existing screen planting
6. Step building forms
7. Locate roof gardens on 4-8 storey buildings
8. Adjust scale to existing 2 storey buildings
9. Locate emergency vehicle + pedestrian shared way
10. Access basement carparking
11. Dedicate potential park
12. Rejuvenate landscape
13. Protect visual outlook
14. Create Channel Walk
15. Locate lighting, pathways + movement of people in surrounding parklands

3.4 Concept Applications

The proposal constitutes a concept DA in accordance with the provisions of section 4.21 and 4.22 of Part 4, Division 4.4 Concept development applications of the EP&A Act.

As per the requirements of Section 4.22 of the EP&A Act 1979, this concept DA sets out the concept proposal for the site. Following determination of this concept DA, further detailed design work will be undertaken and subsequent detailed applications submitted for the site.

Further, in accordance with Section 4.22(4), this application does not seek consent for the carrying out of development on any part of the site. Any future DAs for development will be in accordance with and be consistent with any consent granted for this concept development application.

Refer to Table 1 under Section 1.8 *Development Staging*, which outlines the various stages and reports and documentation that are to be prepared in support of the future applications for development.

3.5 Description of the Masterplan Concept

The concept plan application seeks to facilitate a residential development of three freestanding 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 final development outcome will be subject to further stages of development applications, assessment and approvals.

The vision for the site is articulated in the attached Design Report, but seeks to *"create a breathing, living environment that is responsive to the sun, light, air and outlook that complements its residential parkland setting and rich cultural history".*

The evolution of the concept is articulated throughout this EIS and the supporting documentation. This has involved a detailed consultation process with the HCAC over a number of years. This process concluded in March 2021, when the proposal was considered and the HCAC gave its support for the concept to move forward to the first development application stage.

The key design aspects that evolved from this process and informed the concept as proposed included the following:

- Celebrate the importance of Clay Cliff Creek and Aboriginal habitation
- Retain and enhance the State Heritage 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 OLOL

The minutes of the meeting following the final presentation to the HCAC are included at Appendix F.

The other key aspect to the design and layout of the concept are the conditions of the SCC. As discussed, on 19 July 2017, the delegate of the Secretary of the department SCC under the ARH SEPP. The SCC certified that: *"the development prescribed in Schedule 1 is compatible with the surrounding land uses, and that development for the purposes of affordable rental housing is not likely to have an adverse effect on the environment".*

The SCC included certain requirements that would require further consideration, such that *"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".*

In broad terms, the proposal is compatible with its context by increasing tree canopy, inserting courtyards, introducing new pedestrian connections, by embedding place into the interpretation of the built form and significant open space, and by permitting pedestrian movement through the site once again.

Compatibility isn't about being the same - the site is already distinctively different. While an appropriately scaled built form is relevant, what is arguably more relevant on this site in this case, is whether the landscape is compatible. The proposal supports significant landscaped areas and accessible open spaces.

The proposed development is a large project that is embedded in being different to its context, while also being compatible - juxtapositions are interesting, and in the passage of time they should occur to create attractive and desirable experiences.

The existing site is blighted industrial land that has the potential to be made much better in many respects; better at Connecting with Country; better at interpreting the colonial and multicultural history of the rich cultural landscape; better at responding to the context with real public benefits and better at looking forward with a strong commitment to a sustainable future.

The site has already evolved into a distinctive place that is a special sub-precinct, an island that is defined by a parkland landscape to the north, stormwater channel to the south with only one street interface. However, the existing uses and structures on the site are redundant and it is important to contain urban sprawl by locating residential occupation and density on sites that have excellent amenity in close proximity to the Parramatta City Centre.

A great gift to the community and Country is to rejuvenate redundant industrial land into a place for all living beings, to manage water and create energy on the site.

It is important to note that a concept DA determination will form a statutory approval of the items requested for assessment by the application and will include the building location, bulk and scale, parking and maximum gross floor area for the development. The requirements imposed on the development by the SSC have been addressed in detail in under Section 1.4 of the attached Design Report and demonstrate that the proposal is compatible in terms of its site design, bulk and scale, parking and maximum gross floor area as it does not cause an adverse impact on the environment or unacceptable environmental risks to the land.

The key design responses to the conditions of the SCC are articulated below and further in the supporting design documentation:

Heritage Impact:

- Detailed consideration of the drivers of the cultural landscape
- Consider heritage linkages as a 'Synthesis Drawing' that develops the narrative for the overall design
- Impact to Hambledon Cottage is important but the concept needs to be understood from a broader perspective that includes Aboriginal, pedestrian network, bike network and river setting
- Design excellence process to guide and preserve design excellence

Bulk, scale and form:

- Reduction in height to 8 storeys from 35 storeys
- Creation of 2,800m² of open space
- Tree screen planting along cottage boundary
- Orthogonal layout of buildings and spaces, with a stepped southern edge to the stormwater channel, reflecting the 19th century urban subdivision pattern

Flooding:

- Flood assessment supports application for development

Aboriginal interpretation:

- Appointment of specific project expert to advise and manage Aboriginal interpretation in the project and consultation with local Aboriginal groups.

3.6 Development Outline and Design Principles

3.6.1 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 three building forms as illustrated in Figure 18 below.

A concept design has been prepared by Stanisic Architects, which is included at Appendix J. This is also supported by a Concept Design Report which is included at Appendix K. It is noted that the Architectural Design Concept is described by Stanisic 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 18: Concept Plan Block Diagram (source: Stanisic Architects)

3.6.2 Building Height

The site has a diagonal cross fall of 1340mm from the northwest 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 3.7 metres – the Clay Cliff. The existing ground levels along Gregory Place are RL 4.00 to RL 5.14 and to the west of the site RL 5.34 to RL 9.04.

Building height has been distributed across the site to adjust to the surrounding context, including the colonial cottages. The distribution of height has been subjected to detailed review by Heritage NSW and Peer Review and is consistent with the outline concept plan supported by the HCAC.

The built form varies in height from RL 18.40 to RL 32.40, adjusting 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 the street wall, 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.

It is noted that the proposed development will exceed the development standard for maximum height of building of 9.2 metres applying under clause 4.3 of the LEP with reference to the Height of Building map.

The proposal will have a maximum height of 27.9 metres, which is a 67% increase on that development standard. It is possible that the request is not required given that Division 5 clause 36 ARH SEPP permits development allowed for in a SCC issued under that SEPP to be carried out with development consent. That provision of the SEPP may override the development standard in the LEP.

In this case, the Secretary's delegate issued a SCC for the development on 19 July 2016, which permits an additional use of the land for the purpose of a residential flat building, with a height to be determined via the requirements of the certificate. A clause 4.6 request has been prepared, notwithstanding the issuing of the SCC, and is included at Appendix E. There are strong planning reasons why an increased height of building exceeding the 9.2 metre standard is appropriate on this site, which are discussed further in the attached request.

3.6.3 Density

The site is not mapped for density in the LEP. The proposed density is 2.5:1 (48,685.13m² GFA) on a site area of 19,480m². There is no maximum density identified within the SCC.

This project is required by the SCC to provide 50% of all housing for affordable rental housing for a minimum of 10 years. The development is for build-to-rent with 50% of all dwellings affordable.

The project is compatible at this density as it is well serviced by significant transport infrastructure, its proximity to the Parramatta City Centre, Parramatta Station and future light rail as well as all of the jobs, community facilities and existing residential apartment developments in the vicinity of the site – particularly to the south of the site in between Experiment Farm and Harris Park Heritage Conservation Areas.

3.6.4 Land Use Mix

The indicative floor plans in the attached architectural design set demonstrate that future development of the site will be able to achieve a mix of housing and support housing choice for key workers and those on lower to medium income households in Parramatta.

In summary, the following indicative housing mix is provided:

1 bedroom – 186 dwellings (38.5%)
2 bedroom – 258 dwellings (53.4%)
3 bedroom – 39 dwellings (8.1%)
Total – 483 dwellings

242 (50% of the total number of apartments) are affordable rental housing in 1, 2 and 3 bed configurations that are suited to older people, people with a disability, and essential key workers. Apartments are generally arranged with an east-west orientation and maximise direct sunlight.

The proposal caters to build-to-rent housing, comprising a wide variety of communal open spaces, apartment types and sizes suited to a wide range of households. In particular, the communal open spaces will be designed to encourage social interaction within the development and have equitable access. In addition, 20% apartments will be designed to achieve 'silver level' Liveable Housing Guideline's universal design features.

3.6.5 Built Form and scale

The bulk and scale of the concept for the site is defined by its locational context, maximum heights, setbacks, and the significant landscape strategy that seeks to respond to the site's landscape setting. An extract of the built form massing and elevation is included below.

Figure 19: Built form and massing

The built form seeks to respond to its setting as follows:

- The bulk of the building has been developed in consultation with the HCAC to achieve an appropriate balance between density and compatibility with the indigenous, colonial and multi-cultural history of the site. The built form has evolved into a stepped form up to 8 storeys in height, with the bulk setback from the northern boundary (Hambledon Cottage) and towards the Channel.
- The proposed street setback along Gregory Place is 5.5 metres to 8.0 metres, setting back to 8.0 metres above the street wall. The existing street setbacks along the eastern side of Gregory Place vary from 8 to 12 metres. 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 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 10 metres to the east. 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 metres side setback to the west boundary with the parkland which maintains existing large tree screen planting.
- The southern setback is 6 metres from the stormwater channel easement to the south of the site. Other existing buildings along the channel have a 0 – 3 metres setback.

3.6.6 Landscape and Common Areas

The concept Plan seeks to provide for significant areas of communal and publicly accessible open space and pedestrian areas in support of the vision for the site and the placemaking strategy to create a people friendly landscaped environment, that is part of the broader historical landscape.

The site was once part of a fertile landscape that was a rich source of food and water for the First Nations people being at the confluence of fresh and sale water environments. While colonial occupation is clearly evident from the nearby State listed heritage items, quieter items also exist, such as the soil, plants and traces of water.

The landscape concept has been developed with the design principles of the strategic framework in mind and has the following characteristics:

- Original line of the 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.
- Shared-way with native walk to include interpretation and discussion on Aboriginal land management and those of early colonial times.
- Connection between sustainability measures and connection with country.
- Neale's cottage interpreted in brick foundation and gravel.

The Landscape Report, prepared by Taylor Brammer Landscape Architects is included at Appendix T. An extract of the landscape concept is included at included below.

Figure 20: Landscape Plan, ground level

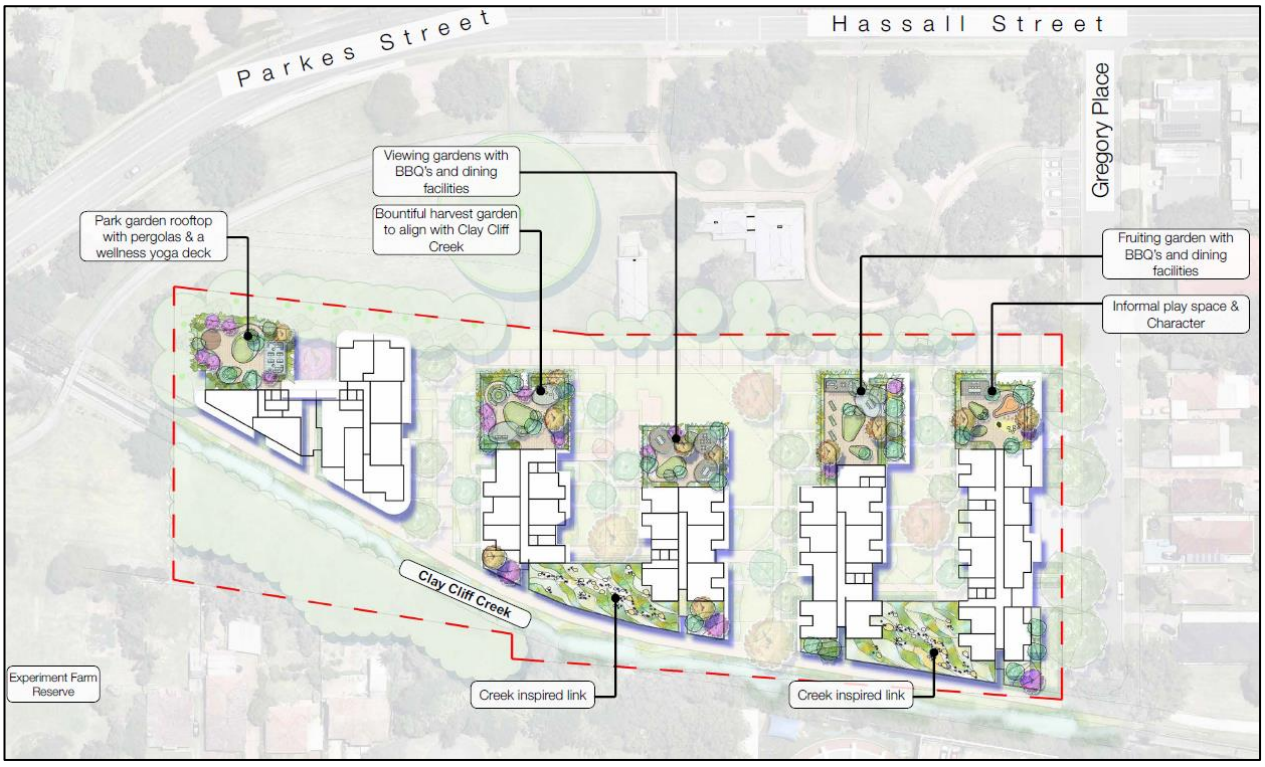


Figure 21: Landscape Plan, rooftop terraces

The site achieves 10,210m² (52.4%) landscaped area on the ground plane, comprising courts, passages, accessways, parks and the channel walk, which greatly exceeds the minimum recommended communal open space area of the Apartment Design Guide (ADG) of 25% (Clause 3D-1).

Communal open spaces at ground level are extensive spaces for passive recreation and social interaction. Roof terraces are active spaces and have individual characteristics that appeal to a range of users including wellness spaces, BBQ and dining, viewing platforms, harvest gardens and a child play space.

Further, the concept achieves 5,700sq.m (29.3%) landscaped deep soil, which exceeds the ADG guidance of 15% of the site area, and combined with a reduction in the built form site coverage over the site compared to the existing factory, the landscape concept supports significant tree planting opportunities.

Communal open spaces achieve excellent direct sunlight at mid-winter, well in excess of the minimum guideline of 2 hours between 9am and 3pm at mid-winter.

3.6.7 Access and Vehicular Movement

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.

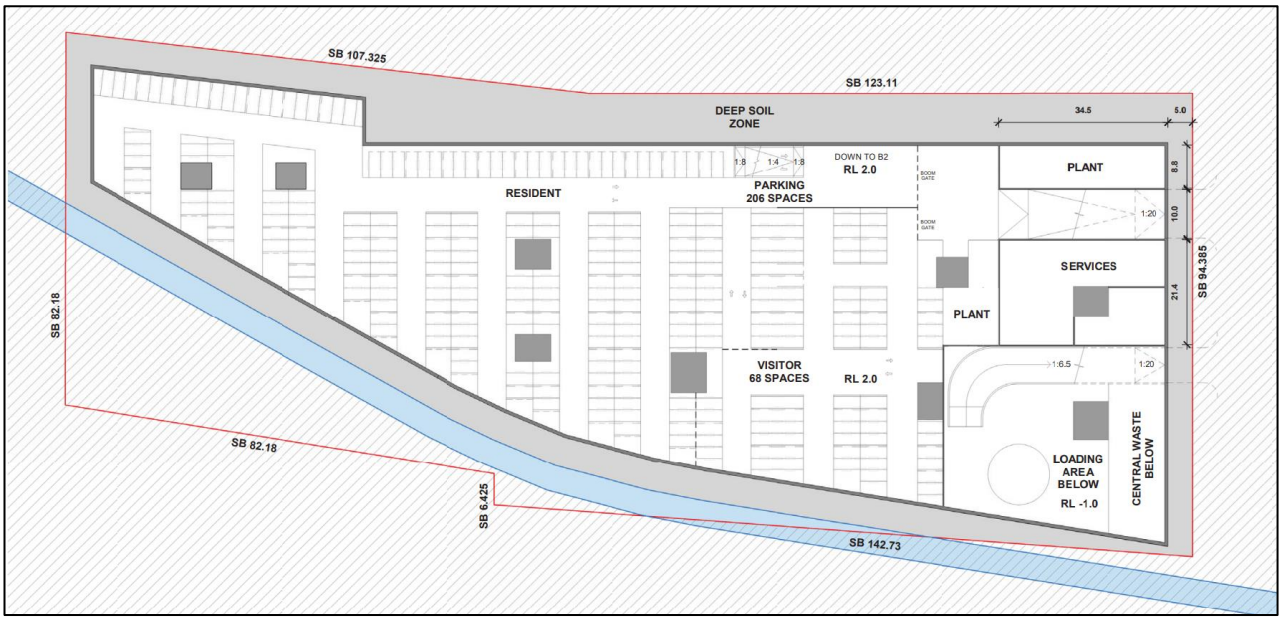


Figure 22: Basement Plan Level 1

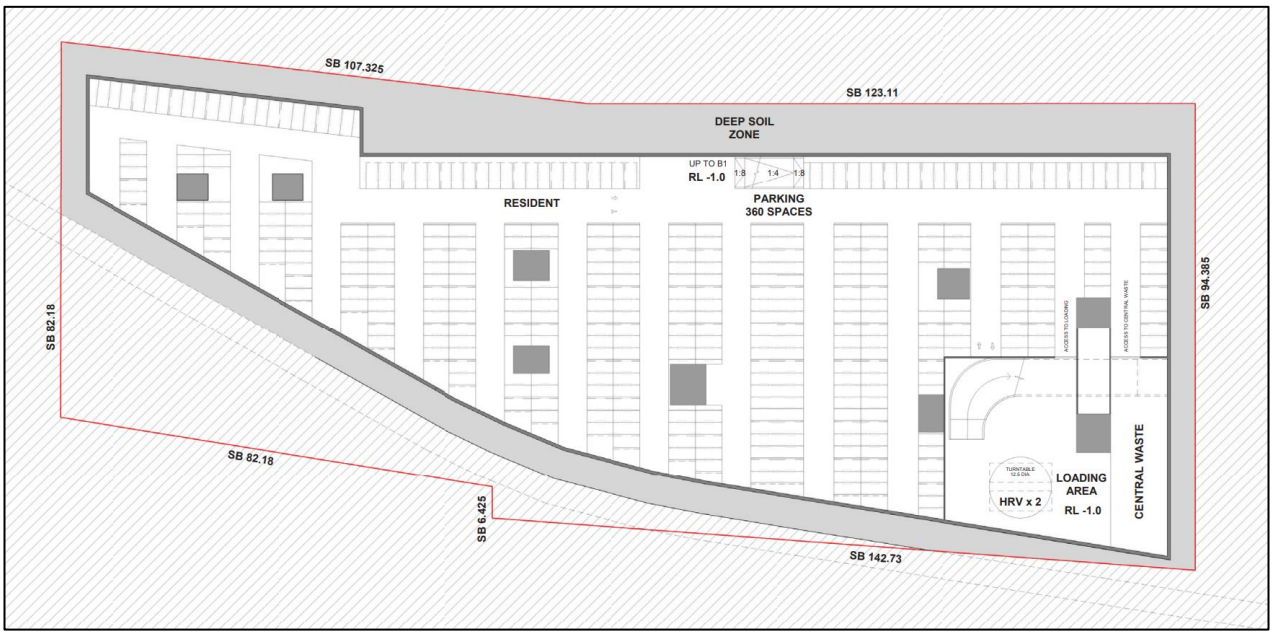


Figure 23: Basement Plan Level 2

In terms of traffic impacts and generation, this is addressed further under Section 6.9.

4. Statutory Context

The SEARs require consideration of all relevant legislation including EPIs, plans, policies and guidelines. The following statutory planning policies have been considered in the assessment of the proposal:

- Environmental Planning and Assessment Act 1979
- NSW Biodiversity Conservation Act 2016
- Environmental Planning and Assessment Regulation 2021
- State Environmental Planning Policy (Planning Systems) 2021
- State Environmental Planning Policy No 65 – Design Quality of Residential Apartment Development
- State Environmental Planning Policy (Housing) 2021
- State Environmental Planning Policy (Resilience and Hazards) 2021
- State Environmental Planning Policy (Transport and Infrastructure) 2021
- Parramatta Local Environmental Plan 2011

4.1 Statutory Requirements

The below table provides a summary of the identification of the statutory requirements for the project in accordance with the DPE's State Significant Development Guidelines.

Category	Action Required
Power to grant approval	The proposal is for a residential flat building to be constructed on land to which Division 5 of the Housing SEPP applies a social housing provider and therefore may be carried out with development consent (Clause 38(1) Housing SEPP). The proposal is SSD for 'build-to-rent housing' with 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. As such, the development is SSD under State Environmental Planning Policy (Planning Systems) 2021 and the Minister for Planning is the consent authority for the development application (cl 2.6(1) and Schedule 1 Cl 27 Planning Systems SEPP). (Appendix I to this report provides an indicative calculation of the CIV of the project, which confirms the proposal exceeds the $100 million threshold). Stephen Murray as Acting Deputy Secretary of the department issued a SCC under the ARH SEPP for the development on 19 July 2017 (at Appendix B to this EIS). Under Clause 37(9) of the ARH SEPP, the term of the certificate was for 5 years from the date of the certificate (to 19 July 2022). Under clause 3(3) of the Savings Provisions at Schedule 7A to the Housing SEPP, the SCC is taken to be a SCC issued under this Policy, Chapter 2, Part 2, Division 5.

	The concept DA proposal meets the following "requirements" for the certified development imposed by Schedule 2 to the SCC: 1. *A partnership with a social housing provider is 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 has already commenced and will continue through the development application process.* 3. *The Applicant accepts that 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.* The concept DA complies with all relevant development standards except for the development standard for maximum height imposed by clause 4.3 of Parramatta LEP 2011, for which a request under clause 4.6 to vary that standard is included with the DA package.
Permissibility	The site is zoned IN1 General Industrial under the Parramatta LEP 2011, under which, '*residential flat buildings'* are prohibited. On 19 July 2017 a SCC was issued by the department, which certified that the development is *"compatible with the surrounding land uses, having regard to the matters set out in Clause 37(6)(b)".* Therefore, the application is permissible by the SCC and the application is advanced in accordance with the provisions of the SCC.
Other approvals	Consent under section 138 of the Roads Act 1993 is required for any works within the public road reserve. Consultation was required as a condition of the SCC with the NSW Office of Environment and the HCAC. A number of meetings have been held with the Heritage NSW and the HCAC who have guided the design process, however there are no formal approvals required from the HCAC. There are no other known additional approvals that are required to carry out the project or that would be required if the project was not classified as SSD.
Pre-Condition to exercising the power to grant approval	An assessment of the mandatory pre-conditions that must be satisfied before the Minister may grant approval to the project is included in the table under Section 4.2 below.
Mandatory matters for consideration	The mandatory matters for consideration are outlined within the Statutory Compliance Table at Appendix D and listed under the table at Section 4.3 below.

Table 6: Identification of Statutory Requirements

4.2 Pre-Conditions

Statutory Reference	Pre-Condition	Relevance	Section in EIS
Biodiversity Conservation Act 2016 (BC Act)	Clause 7.9(1) of the BC Act 2016 requires any application for development under Part 4 of the EP&A Act 1979 for State Significant Development to be accompanied by a biodiversity development assessment report unless the Planning Agency Head and Environment Agency Head determine that the proposed development is not likely to have any significant impact on biodiversity values.	A request for a waiver for the requirement to prepare a Biodiversity Development Assessment Report (BDAR) was prepared by MJD Environmental and submitted to the DPE on 20 June 2022. The waiver was supported by Aboricultural Impact Assessment and Tree Management Plan, which identifies the trees within and adjoining the site and provides an individual health condition assessment, and their suitability for retention, preservation or removal A BDAR waiver was issued on 22 June 2022, confirming that "the proposed development is not likely to have any significant impact on biodiversity values and therefore a Biodiversity Development Assessment Report is not required". The waiver is included at Appendix Y.	Section 6.10 Appendix Y
State Environmental Planning Policy (Resilience and Hazards) 2021	Clause 4.6 of the Resilience and Hazards SEPP requires that a consent authority must not consent to the carrying out of development on land unless: *(a) it has considered whether the land is contaminated, and* *(b) if the land is contaminated, it is satisfied that the land is suitable in its contaminated state (or will be suitable, after remediation) for the purpose for which the development is proposed to be carried out, and* *(c) if the land requires remediation to be made suitable for the purpose for which the development is proposed to be carried out, it is satisfied that the land will be*	A detailed Phase 2 Contamination Investigation and Remediation Action Plan (RAP), have been prepared by Sullivan Environmental Sciences to *"demonstrate the site is suitable (or will be suitable, after remediation) for the development".* The reports are included at Appendix EE. The report makes a number of recommendations, and importantly concludes: *"Sullivan-ES conclude that the site can be made suitable for the proposed high density residential use subject to closing out data gaps, decommissioning of (Underground Storage Tanks) USTs and the (Effluent Treatment Plant) ETP onsite and performing remediation works in localised areas of the site to remove any unacceptable health risks".*	Section 6.15 Appendix EE

	remediated before the land is used for that purpose.	*We recommend that a Remedial Action Plan (RAP) is prepared. The RAP should be prepared or reviewed and approved by a Certified Environmental Practitioner specialising in Site Contamination (CEnvP-SC) as certified by one of the two schemes recognised by the NSW Environment Protection Authority.* As mentioned above, a RAP has been prepared to provide a plan detailing the remedial work activities including delineating contamination, removal, validation, WH&S and environment management strategies associated with the remediation of localised impacted soil material at the site. The RAP has been prepared in accordance with relevant NSW EPA guidance documentation and industry standards, with sufficient detail to implement the preferred remedial strategy.	
State Environmental Planning Policy (Housing) 2021	Clause 38(2) of the Housing SEPP requires that consent must not be granted Division 5 unless the consent authority is satisfied that "*the Planning Secretary has certified in a site compatibility certificate that, in the Planning Secretary's opinion, the residential flat building is compatible with the surrounding land uses".*	As the site is zoned IN1 General Industrial, under which "*Residential flat buildings*" are prohibited, an application was made in December 2016 for a SCC to the department pursuant to the provisions of Division 5 of the ARH SEPP (now Housing SEPP). On 19 July 2017, under the provisions of Clause 37 of Division 5 of the ARH SEPP a SCC was issued by the department, 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)".	Section 1.4.1 Appendix D

		Note: Under clause 3(3) of the Savings Provisions at Schedule 7A to the Housing SEPP, the SCC is taken to be a SCC issued under this Policy, Chapter 2, Part 2, Division 5.	

Table 7: Pre-Conditions

4.3 Mandatory Considerations

Statutory Reference	Mandatory Consideration	Section in the EIS
Consideration under the Act and Regulation		
Section 1.3	Relevant Objects of the Act	Appendix D
Section 4.15	Relevant environmental planning instruments	Appendix D
	• State Environmental Planning Policy (Planning Systems) 2021	Appendix D
	• State Environmental Planning Policy No 65 – Design Quality of Residential Apartment Development	Appendix D
	• State Environmental Planning Policy (Housing) 2021	Appendix D
	• State Environmental Planning Policy (Transport and Infrastructure) 2021	Appendix D
	Relevant planning agreement or draft planning agreement There are no planning agreements relevant to the proposal	N/A
	The likely impacts of that development, including environmental impacts on both the natural and built environments, and social and economic impacts in the locality	Section 6
	The suitability of the site for the development	Section 7
	The public interest	Section 7
Section 4.2.4	Relevant concept approval This is a concept application under Division 4.4 of the EP&A Act	All of EIS
Mandatory relevant considerations under EPIs		
	• State Environmental Planning Policy (Resilience and Hazards) 2021	Appendix D
	• Parramatta Local Environmental Plan 2011	Appendix D
Considerations under other relevant legislation		
	• NSW Biodiversity Conservation Act 2016	Appendix D
	The likely impact of the proposed development on biodiversity values as assessed in the biodiversity development assessment report. The Minister for Planning may (but is not required to)	Section 6

	further consider under that Act the likely impact of the proposed development on biodiversity values.	
Development Control Plans		
	Parramatta DCP 2011	Appendix D

Table 8: Mandatory Considerations

5. Engagement

To seek stakeholder input into the concept DA, community and stakeholder engagement was undertaken by Forward Thinking between 25 April and 15 June 2022. The engagement has been conducted in line with the methodology and requirements outlined in the Department of Planning and Environment *Undertaking Engagement Guidelines for State Significant Projects, 2021*, and a summary of the methodology, findings and proponent response to issues are discussed I n this section.

Forward Thinking have also conducted the SIA for the concept DA and the two processes have usefully informed one another. The SIA report provides an additional level of detail around social impacts and proposed mitigation measures for the site and can be read in conjunction with the Engagement Report. The Engagement Report is included at Appendix NN, and the SIA is included at Appendix LL.

5.1 Engagement Methodology

To seek stakeholder input into the concept DA, community and stakeholder engagement was undertaken by Forward Thinking between 25 April and 15 June 2022. The engagement approach and methodology adopted for the project is outlined in the below Figure.

Figure 24: Stakeholder engagement approach and methodology

5.2 Findings

As engagement is occurring at the concept DA stage, the discussions that were conducted with key stakeholders and the community were at a relatively high level, broadly exploring the site and the opportunities/ constraints to the future redevelopment. Notwithstanding the relatively low levels of engagement, the following findings can be made:

- There was agreement across all engagement participants **that the site is of strategic importance and presents unique opportunities for redevelopment and renewal**. It's close proximity to Parramatta CBD, its location on the new Parramatta Light Rail, and its vicinity to state significant heritage items were cited by many participants.

- **History and heritage (including Aboriginal and Colonial history) are highly valued by the community,** and it will be important for development on the site to respect and enhance these values.

- There was **general support from most engagement participants for the sites redevelopment** and many indicated support for the concept DA on the provision that key impacts such as traffic, parking and overshadowing are managed on the site.

- **A small number of community members who live close to the site are concerned** about the proposal in particular:
  - Height and density of the proposal
  - The increase in traffic to the local area
  - Potential impacts on adjoining church and Hambledon Cottage

- Key agencies including the department council emphasised **the importance of accessible pedestrian connections through the site**, and the opportunity the proposal provided to "open up" and "re-connect" the site to the surrounding local area.

- The department emphasised the importance of **providing community benefit provisions through each stage of the proposal** and not all at the end of the project. They also emphasised that the distribution and **quality of common places** (e.g. work from, home spaces, prayer spaces or gyms) will be important. These should ideally reflect the types of people likely to live there.

- Most participants were **supportive and positive about the open space, landscaping and place making opportunities** the proposal presented, particularly the Clay Cliff Creek walk. There was a desire for these spaces to be of high quality and useable.

- There was general support for the **affordable housing and BTR component** of the proposal with the exception of one community member who was of the view that it would bring "less desirable characters" to the area. Several key stakeholders acknowledged the **need for affordable housing in the Parramatta LGA**, on the provision that it is a **high-quality living environment, well managed and a suitable density**.

- A couple of stakeholders, including the council cited that there is currently **pressure on parks, open space and recreational facilities in the LGA**, and that where possible, the proposal could look to address some of these shortfalls, or at the least take the pressure off the current provision by providing adequate onsite facilities.

Key stakeholders including direct neighbours and key interest groups (including OLOL, Parramatta & District Historical Society and the Parramatta Chamber of Commerce), expressed interest in further opportunities for engagement and collaboration during future stages of the site design and planning process.

5.3 Summary of Issues raised and proponent response

Key theme raised	Response
Community benefit and open space • Community facilities or benefits of the project are to be provided through each stage of the proposal and not all at the end of the project • A desire for plenty of trees and green screening on the site	• 67% of the ground plane of the site is used as open space with the majority of open space being permanently publicly accessible (concept plan). • Accessible roof tops provide private open space exclusive to residents (concept plan) • Developed place making principles for the site (concept plan) • New street tree planting and increased tree canopy cover across the site to define the site as a subprecinct along Gregory Place (concept plan) • Community engagement opportunities during detailed design phases to ensure publicly accessible open spaces are designed for maximum use and functionality. This should include further engagement with the Indigenous groups involved in the concept plan design workshop (detailed design/ DA stage) • Engagement with council on public benefit for the site, including meeting community need and demand (detailed design/ DA stage)
Visual impacts • Visual impacts associated with increased building footprints on the site – changes to the way people view and experience the site (particularly immediate neighbours OLOL and Hambledon Cottage)	• Involvement of direct neighbours and businesses in the detailed design of the buildings on the site including materials, colours etc (detailed design/ DA stage) • Placement of buildings on the site in furthest proximity from Hambledon Cottage (concept plan) • Existing tree canopy will be supplemented with new trees to create a green screen directly behind Hambledon Cottage and from the eastern view to the site (concept plan)
Traffic and parking • Changes to traffic flows and parking on surrounding streets and impacts on how current and future communities move around the site • Parking concerns from neighbours holding events and tours including the OLOL and Hambledon Cottage.	• Provision of spatial allowances to accommodate adequate tenant and visitor parking determined by the future dwelling typology breakup (concept plan) • Provision of site accessibility for deliveries, waste and ambulance services to be within the basement level (Concept Plan and detailed design) • Fire and Rescue NSW appliance access provided at ground floor (concept plan) • Sustainable travel options promoted through a green travel plan, reducing reliance on private vehicle travel (concept plan)

Construction impacts • Short term construction impacts on nearby residential properties, both noise and traffic impacts	• Development of a community consultative committee to discuss construction impacts and mitigation measures (such as relocating vulnerable people sensitive to noise, dust etc) (construction and operational stage) • Construction site establishment and management to locate nosiest elements furthest away from sensitive receivers (construction stage) • Preparation of a construction noise and vibration management plan (construction stage)
Affordable housing/ BTR uses on site • Crime, safety, noise, social cohesion, management of site • Use compatibility with surrounding neighbours (such as the OLOL who events etc and are concerned about noise impacts on residents)	• A Plan of Management for the site that includes issues such as rubbish removal, presentation of any balconies and general site amenity etc (detailed design and DA stage, operational stage • Site specific CPTED measures related to surveillance, access control, territorial reinforcement and activity and space management (see CPTED report by TaylorBrammer for 2A Gregory Place, Harris Park dated June 2022). • CHP management protocols including conflict resolution, complaints line and register, on site security checks, CCTV • Post occupancy assessment at set intervals, conducted by independent social planning consultant (operational phase)
Common spaces on the site and distribution of private rental and affordable housing • The distribution and quality of common places (e.g., work from, home spaces, prayer spaces or gyms) will be important. These should ideally reflect the types of people likely to live there	• Provision of communal facilities on site in a variety of configurations. Type and size to be provided with the first stage construction development application • Provision of functional, high quality, public and private open space across the site • Anticipated communal and shared spaces include the following. These are subject to detailed design and further consultation with stakeholders. – Storage spaces capable of accommodating bicycle parking – Quiet spaces to allow those working from home to participate in online meetings and the like. – Community rooms on upper levels for quiet pursuits – Communal rooms on lower levels for louder pursuits including celebrations and the like – Communal edible gardens – The establishment of a complex wide shared space whereby those in need of tools, skills etc can ‘share’ with neighbours

Pedestrian accessways • Creating accessible pedestrian connections through the site, especially adjacent to the stormwater channel will be important	• New publicly accessible connections into and around the site, including walkways, shared paths and significant landscaping and vegetation planting across the precinct (concept plan and detailed design/ DA stage) • Active transport plan to be developed during detailed design phase of the process (detailed design/ DA stage)
Recreation facilities and open space on site • Concern there is pressure on open space and parkland in Parramatta due to the high-density developments. The site needs to accommodate for things like sport and recreation facilities, open space to reduce pressure on other facilities	• Design of open space on site has considered areas for active and passive recreation, and has considered the need to complement existing active open space and recreation within the vicinity of the site (including nearby James Ruse and Robin Thomas Reserve) • Undertake a more detailed assessment, evaluation and benchmarking of surrounding provision of open space and recreation facilities to help inform detailed design on the site
Site interface with Hambledon Cottage • Concerns about how the Hambledon Cottage site interfaces with the proposed development. Of the view that a defined boundary and separation is needed, to avoid any impacts on groups of people (including children) who gather for tours of the heritage site	• At the detailed design stage, conduct an analysis of the current uses and pedestrian movements undertaken on and around the Hambledon Cottage site, and respectively design the interface of the two sites in collaboration with council (landowner), The Parramatta & District Historical Society, and the NSW Heritage Council
Land contamination • Concern about land contamination (asbestos) on the subject site, and impacts associated with any excavation and building works to health and safety of people on the Hambledon Cottage site	• A preliminary site investigation (desktop assessment) has been undertaken which identified the potential for contamination • A detailed site investigation was undertaken which involved physical testing onsite in areas identified with the potential for contamination and to ensure general site coverage • A remediation action plan has been prepared to establish the framework both to deal with the anticipated contamination and unexpected finds

Table 9: Proponent response to issues raised throughout the engagement process

5.4 Limitations and further engagement

Despite significant efforts, engagement numbers have been low at the concept plan stage of the planning process. Opportunities have been identified to conduct more detailed engagement as part of future planning stages of the project, including further targeted engagement with the Indian community and hard to reach groups. This current round of engagement has identified a handful of key stakeholders and community representatives who are interested in being involved in future stages of the project, including more detailed design, and are generally supportive of appropriate redevelopment of the site. Given the strategic importance of the site there may be opportunities to involve these stakeholders as part of a reference group that can function throughout all stages of the project through to construction and operation of the site.

5.5 Conclusion

The stakeholder and community engagement process for the concept DA stage of the project has provided useful insights into the local area, flagged some potential impacts and raised some considerations and ideas for inclusion in the more detailed design stages of the site planning process. As outlined in Section 4 of this report, the proponent has considered and provided a response for the issues raised to date and is committed to further engagement throughout future stages of the development.

6. Assessment of Impacts

This section addresses the key issues identified in the SEARs and provides a detailed summary of the results of the assessment of the potential impacts of the project. It is noted that the application seeks consent for concept only under Division 4.4 of the EP& A Act 2917 and therefore consideration of impacts prescribed by the SEARs is proportionate to the likely scale and nature of the impacts.

6.1 Capital Investment Value and Employment

The direct impact of the construction will be the value of the works that are undertaken in building the development. The value of the construction has been assessed by quantity surveyors, APL Quantity Surveyors. They have estimated that the construction cost will be $161.7 million, including GST and builders margin. Builders margin and GST need to be netted out of this to get the direct impact of construction. Refer to the QS Report attached at Appendix I.

The high-level estimate of costs, including the total cost of building, is $127.3 million, which has been used to model the economic impact.

$127.3 million of investment in the construction industry in Parramatta has a much larger effect on the local, state and national economy than the initial investment alone. The $127.3 million direct investment results in $20.6 million being spent through the supply chain in Parramatta, as this becomes the income for local suppliers. Furthermore, the boost to wages and salaries in the Parramatta LGA is then spent on goods and services in the LGA, resulting in a further $4.8 million in economic output.

The direct expenditure of $127.3 million results in 340 jobs created in the construction sector in the Parramatta LGA. Further, it induces another 71 jobs due to the supply chain effect, and then another 21 due to the consumption effect, resulting in 433 jobs in total (direct and indirect).

The Construction industry is most impacted, accounting for 354 jobs, while Retail Trade is next with 16 jobs and Transport, Postal and Warehousing and Manufacturing each with 12 jobs created.

Refer to the Economic Impact Assessment Report prepared by PPM Consulting at Appendix H.

6.2 Design Quality

The initial building design developed during the SCC process has been significantly modified during the process taking into consideration guiding recommendations of Heritage NSW and expert peer review process with Alec Tzannes. This has included:

- Reduced building heights and density;
- Orthogonal layout of built form across the site;
- Varied building forms heights that have been adjust to the surrounding context, including the relocation of built form to the south of the site along the existing stormwater channel;
- Development of a draft framework that is embedded within design and planning that can be developed in collaboration with the local Aboriginal community to explore opportunities to recognise the Aboriginal cultural heritage of the area;
- Increased landscape open space, particularly behind Hambledon Cottage;
- Publicly accessible through site links;

- Implementation of a sustainability framework that will guide the development;
- Landscape design principles to ensure compatibility with the existing landscape and further define the site as a special precinct within Harris Park; and
- Incorporation of roof terraces.

As required by the SCC, extensive liaison has taken place with the Office of Environment and Heritage, now Heritage NSW, particularly in relation to the issues of bulk and scale of the proposed development. A series of workshops have been held since 2020 with the HCAC culminating in support for the progression of the scheme to a concept application on 2 March 2021. The background and evolution of the scheme to this point is included in the Design Report at Appendix K.

6.2.1 Peer Review Process

A Peer Review Process was established, comprising Alec Tzannes and Otto Cserhalmi, who are both highly experienced and respected Architects, to provide expert advice on these specific issues raised by the HCAC. The review process allowed for design testing to balance the need to achieve a level of density in the scheme to maintain economic viability that supports the social benefits outcomes of reduced-cost affordable rental housing, the impact on the heritage landscaped setting, proposed built form, amenity and sustainable framework for the development.

A Peer Review Report has been prepared by Alec Tzannes in support of the proposal, including the draft reference scheme at this concept DA stage. The report also provides commentary in response to the Government Architect's review of the reference scheme and general assessment of the proposal to be taken into consideration as the design develops. Refer to the Peer Review Report included at Section 6.2 of the Architectural Design Report at Appendix K.

The Peer Review Process was very successful in developing a clear vision for the site and narrative that seeks to rejuvenate a blighted site for residential occupation, better Connect with Country by embedding place into the interpretation of the built form and significant open spaces, by permitting pedestrian movement through the site once again and by making a strong sustainable commitment towards the future.

During the Peer Review Process, many modifications were made to the design, including:

- Developed an authentic design narrative and cultural overlay into the design of the ground plane and roof terraces by creating opportunities within the communal open spaces for people to sharing knowledge between communities, incorporating endemic vegetation, pollination pathways to roof terrace and concept of blurring the boundary between the site and the curtilage of Hambledon Cottage.

- Developing a material palette comprising permeable enviromesh surface along the through site way and recycled bricks for the ground plane, as well as low carbon concrete and brickwork for the built form that reflects the cultural history of the site and the Clay Cliff in a red/brown colour (Red Cliff/ Redlands).

- Develop principles of sustainable urbanism including Whole of Life Carbon, sustainable initiatives for the landscaped open spaces and built elements, increased tree canopy to reduce the heat island effect, potential for misting to cool the landscape above 35 deg C, water sensitive urban design, photovoltaic cells on the rooftop for supplying energy for common area lighting.

- Increased the size of the main courtyard by removing built form at the ground plane and introducing an opportunity for an interpretive open space element below the building in the location where Neale's Cottage once stood.

- Introduced a roof terrace to Building C that overlooks the parkland and Parramatta City Centre.

- Introduced additional modulation to building envelopes to better adjust to the surrounding context, including setting back upper levels along Gregory Place and northern boundary, reducing the length of walls and reducing height at key corners of the building envelope along the through site way.

- Redistributed built form to the link building, along the through site way at Building A + B.

- Introduced two storey apartments along the through site way at Building A + B to increase amenity to apartments.

- Separated access for parking and loading within the basement, consolidated service rooms to the street.

- Introduced large canopy trees along Gregory Place to acknowledge and reinforce the site as an existing special sub-precinct, that has characteristics that are different from the surrounding context.

6.2.2 Design Excellence

To date, two presentations have been held with the SDRP These presentations were held on 9 December 2021 and 25 May 2022.

A detailed and comprehensive response table has been prepared by the project team and is included at Appendix C. The complete response won't be reproduced here to avoid repetition. However, it is noted that following the most recent presentation on 25 May, the elements of the design strategy that were supported included:

- Collaboration with Yerrabingin and approach to Connecting with Country.
- Community consultation strategy and integration of feedback into the design process.
- Biodiverse planting palette.
- Increase of accessible and usable roof terraces.
- Provision of affordable housing in accordance with requirements of the SCC.

Further, some concerns were raised with the design of the ground plane and spaces around the proposed buildings, which are considered a critical aspect of the project's success. In this context, it is important to note that the presentations to the SDRP have involved quite advanced designs and level of detail. The comments do not necessarily reflect the context of this application, being simply a concept application, but reflect the rigor of discussions with the SDRP and the level of thought and consideration being advanced with the design. The critical issues raised are being considered to ensure that the footprints and envelopes sought through the application will support and facilitate a design outcome of the highest standard.

The following responses have been prepared by Stanisic Architects in response to *some* of the critical issues:

SDRP Comment		Project Team Response
2	**The ground plane**	
	The design of the ground plane and spaces around the proposed buildings are a critical aspect of this project's success; the quality, accessibility and consideration of safety throughout the site, including the creek corridor are of high importance. If the landscaped open spaces are not comfortable to access or attractive to be in they will result in vacant, unactivated spaces, negatively impacting the entire development. The bulk and scale of the built forms (including separation between massing) have impacts in terms of overshadowing, privacy, acoustic comfort and the amenity of open spaces associated with the buildings. The proposed built forms need to be analysed and reviewed to ensure they support successful landscape spaces at ground level and high amenity living spaces internally. *The following recommendations apply, and may require adjustments to the height, form, layout and setbacks of the proposed buildings to achieve design outcomes of appropriate quality:*	
a	*Provide sketches and diagrams demonstrating spatial analysis and envisaged spatial quality of the creek corridor, courtyards and spaces between buildings.*	The Landscape Concept Plan includes detailed plans and cross sections that illustrate the envisaged characteristics of the communal open spaces and publicly accessible communal open spaces on the site.
b	*Ensure the conditions and sense of scale along the creek corridor pedestrian journey are attractive and comfortable, inviting high usage all year round.*	The contextual relationships of the built form along the Channel Walk are varied and have the potential to be vital, memorable, with appropriately varied expressions. This was addressed in detail during the 1st SDRP Review and response, demonstrating how the creek walk will be attractive, safe and encourage high usage all year round.
c	*Undertake sun eye view analysis as part of the resolution of the private and public open spaces including along the creek corridor to ensure they receive adequate natural light all year round.*	The architectural drawings prepared by Stanisic Architects incorporate a sun eye view and shadow diagram analysis of the proposal to confirm the impact of the proposed built form and to understand the direct sunlight achieved to the Channel Walk at the winter solstice.
d	*Review the spatial quality and appropriateness of the deep proportions of Courtyard A and relationship with surrounding built form.*	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 built form has been modified during extensive consultation with the NSW Heritage Council who provided their support for extending the grid of Harris Park onto the site and creating a large open space directly behind Hambledon Cottage to transition from the low-rise cottage to the taller forms along the stormwater channel and interpret the location of Neale's Cottage that once stood on the site. A key guiding principle from a heritage perspective was to achieve a large open space behind the cottage that provides a clear spatial transition between properties.

		Building A is a u-shaped building with heights that vary from 6-8 storeys with significant modulation within the internal courtyard space that reduces the length of walls and creates a number of spaces within the north facing courtyard. As a consequence, Building A achieves very different characteristics to Building B + C which is desirable and has been encouraged by the SDRP. The Concept Envelope has been modulated to achieve a high level of amenity for occupants as well as ensuring compatibility with the surrounding context. There is no need or basis to further "break down" the floor plates or" reduce their size" as the key guidelines of the Apartment Design Guide (solar access, natural cross ventilation, deep soil, communal open space and building separation) are all achieved and in most cases greatly exceeded
e	*Provide landscape design concepts explaining how courtyard A will be planted, landscaped and programmed.*	The Landscape Concept Plan illustrates how Courtyard A will be planted, landscaped and programmed. Communal Open Spaces will meet the guidelines of the Apartment Design Guide by creating places for extensive and intensive activities, with seating areas, lawns, BBQs and areas for quiet reflection.
f	*Provide further resolution of the ground floor plane, in particular explaining any level changes, permeability, the edge conditions at the site perimeter, and further clarity of the 1m transition and freeboarding to the building edges.*	The Landscape Concept Plan includes detailed cross sections through the site to illustrate the characteristics of the ground plane experienced by pedestrians who move through the site as well as areas of hard and soft landscaping. The Level 1 (Ground) Plan (CD 2003) prepared by Stanisic Architects illustrates that there are subtle changed in level that direct overland water to the stormwater channel to create areas where there is substantial areas of contributary deep soil planting that meets the guidelines of the ADG to support tree planting. In addition to this, the basement has been setback from all boundaries of the site to create a deep soil zone for tree planting around the site and within the reserve to the south west of the site. Along the channel walk, the topography varies greatly. To the east of the site, the remnant Clay Cliff creates a contained space that slowly opens as the topography reduced to the west of the site. These spatial characteristics will be exploited within the architectural expression to create contextually responsive buildings and interesting spaces. In addition to the intersecting pathways at Passage 1 and 2, there are clearly defined entry lobbies that activate the channel walk, marked by modulation of the built form. The varying topography across the site results in a number of different conditions at the ground level of buildings. Within the communal courtyards, private terraces are located at the same level of the courtyard with visual

		privacy achieved with deep planters between the courtyard and the terraces. Along the passages, ground level apartments are raised as the Passages meet the existing levels of the stormwater channel. Deep planters are also used to achieve visual privacy. Along the Channel Walk, ground level apartments are raised approximately 1m with planting between the walkway and balconies to apartments to achieve visual privacy. Balconies are located along publicly accessible pathways and to the communal courtyard to achieve visual surveillance and security. Along the Channel Walk, balconies can be angled and articulated to maximise vistas to the adjacent pocket park, reserve and Channel Walk to also achieve visual surveillance and security.
3	**Residential amenity**	
	There is concern that adequate solar access and natural ventilation cannot be achieved within the built forms proposed. More information (in addition to metric drawings supplied) is required to demonstrate how these have been determined. Achieving good residential amenity is a key driver in determining the appropriate density for this site, as per Schedule 2 of the SCC.	
a	*Provide a full set of architectural floor plans demonstrating how the apartment layouts achieve cross ventilation and solar access. On the current drawings it appears some single aspect apartments achieve cross ventilation – these need further review.*	The proposal is a concept proposal and provides a SEPP65 compliant envelope within which a detailed design is developed. The architectural reference scheme drawings prepared by Stanisic Architects is one way the future design could progress. Notwithstanding, it provides solar and cross ventilation diagrams identifying compliance with the ADG controls are complied with.
b	*Provide sun eye view diagrams demonstrating how the apartments are receiving solar access throughout the day in mid winter to verify how the solar access targets have been achieved.*	The proposal is a concept proposal and provides a SEPP65 compliant envelope within which a detailed design is developed. The architectural reference scheme drawings prepared by Stanisic Architects is one way the future design could progress. Notwithstanding, it provides solar and cross ventilation diagrams identifying compliance with the ADG controls are complied with.

Table 10: Summary response to SDRP 25 May 2022

Further comments in relation to heritage and local context, tree canopy and traffic and wayfinding is further addressed in the attached SDRP response table at Appendix C.

6.3 Built Form and Urban Design

The attached Design Report prepared by Stanisic Architects and attached at Appendix K provides a comprehensive history, site and context analysis and how the site planning approach has addressed the suitability of the site for the development in the vicinity of significant heritage items surrounding the site, flooding, access and the bulk and scale of the development.

The built form and design outcome has been subject to extensive review and guidance by the HCAC prior to lodgement of this application that required building heights stepped to a maximum of 8 storeys and floor space was relocated along the channel to achieve a suitable backdrop to Hambledon Cottage. As indigenous, colonial and multicultural history is of upmost importance on this site, the built form has responded to each of these layers to achieve a site-specific response that is nuanced to achieve compatibility.

6.3.1 Site Analysis

An evolutionary analysis of the context has revealed another level of opportunities and constraints. The Parramatta River, Clay Cliff Creek and Parramatta Sand Body are enduring natural features that have persisted for thousands of years and guided contemporary development. The Clay Cliff is a natural barrier that separates the site at the lower level, from the development to the south at the higher level. Alfred Street formed the boundary of the Macarthur and Harris Estates that restricted development of Parramatta City Centre to the east. Elizabeth Farm and Experiment Farm are located on the high ground, Hambledon Cottage on the lower ground.

There is an extraordinary opportunity in the evolution of the context at a broader scale to rejuvenate a large area of former parkland, to better connect the three heritage cottages and the Sand Body as well as introduce physical connections through the site once again.

There are opportunities to increase landscape open space, particularly behind Hambledon Cottage and achieve spatial integration between open spaces. Another important consideration is to maintain a view cone from the verandah of Experiment Farm towards Parramatta River and the Ridge - existing 1 + 2 storey dwellings along Ruse Street and existing vegetation limit the view cone extending further to the east.

Our Lady of Lebanon Cathedral is a dominant form within the context and is seen when travelling east-west along Hassall Street/ Parkes Street. It is an important cultural element to the community but is entirely inwardly focused within with translucent stained glass windows around the perimeter and no outlook from within the Cathedral. However, at the entry to the Cathedral, there is an external gathering space with outlook towards the north across the site that could be retained to maintain a visual connection with Parramatta River. Importantly, solar access to the stained-glass windows is not required, as stained glass requires daylight not direct sunlight. Outlook from the adjacent carpark structure will be unaffected as outlook is retained north along Gregory Place and to the east.

A site analysis plan prepared by Stanisic Architects is included below and also available in the attached Design Report.

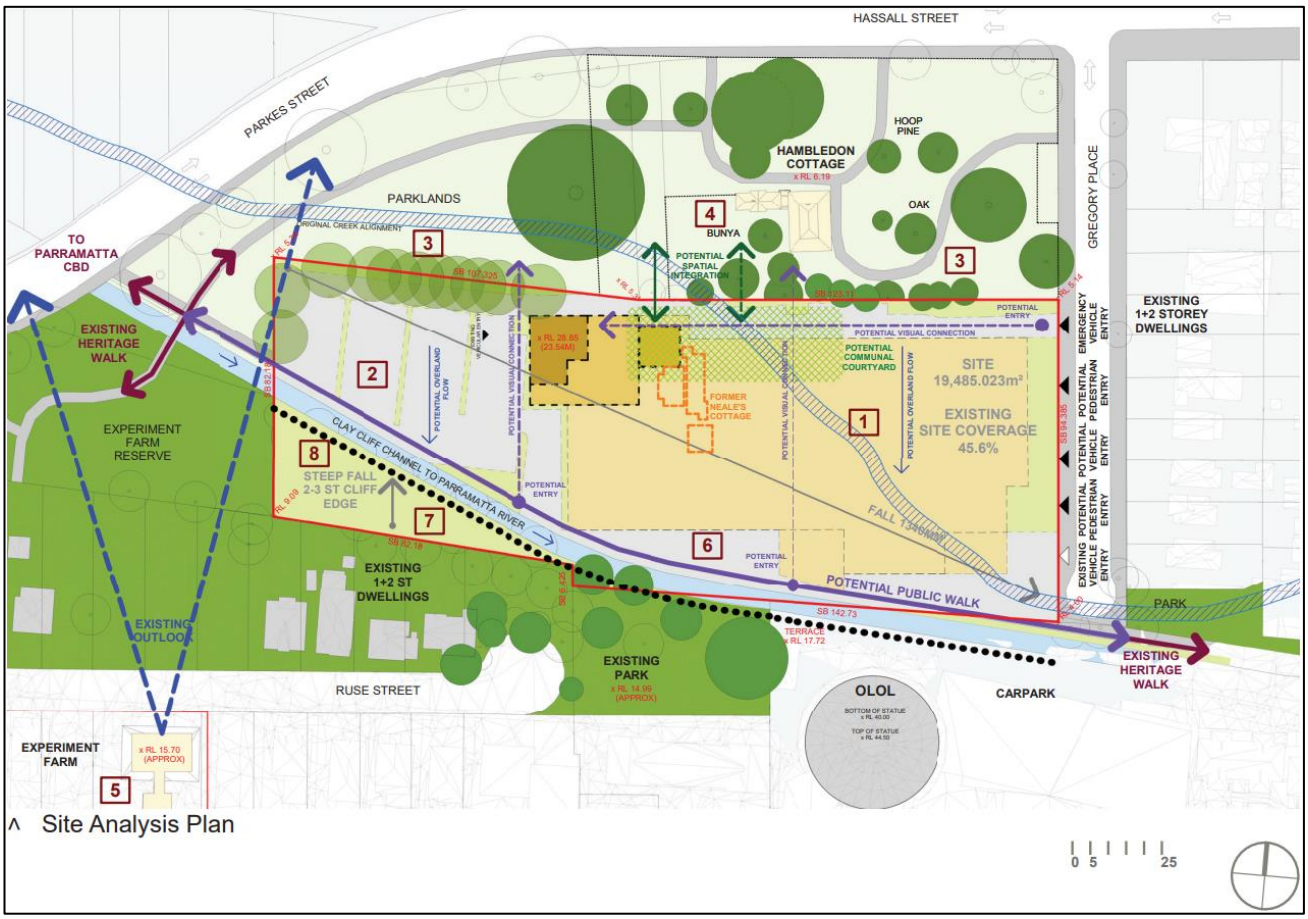


Figure 25: Site Analysis Plan (*source: Stanisic Architects*)

6.3.2 *Built form concept*

Bringing an authentic design narrative and cultural overlay provides a holistic placemaking strategy, which distinguishes the site design and architecture of the development to create a specificity and authenticity.

There has been a significant shift from the original layout, developed with council (radial scheme with visual corridors between colonial Heritage Items) to a scheme that is embedded with Caring for Country and better connecting with the context.

As a result of consultations with the NSW Heritage Council and the Peer Review Panel, the site design has evolved to include a number of key characteristics and features.

The architectural concept is for three freestanding 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 envelope is illustrated below:

Figure 26: Built Form Envelope

In order to assess the suitability of the proposed built form (building envelope as part of a concept application), the design report has considered the compatibility of built form in terms of its bulk and scale. The bulk of the building, defined by its setbacks, building height and landscaped area is designed to respond to the site context, character and streetscape as follows:

- The proposed street setback along Gregory Place is 5.5 metres to 8.0 metres, setting back to 8.0 metres above the street wall. The existing street setbacks along the eastern side of Gregory Place vary from 8 to 12 metres. 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 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 6 metres to the west, 24 metres directly behind Hambledon Cottage and 10 metres 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 metre side setback to the west boundary with the parkland which maintains existing large tree screen planting.
- The southern setback is 6 metres from the stormwater channel easement to the south of the site and is consistent with other parts of Sydney, specifically Alexandria where 8 storey buildings are setback 6m from a stormwater channel. Other existing buildings along the channel have a 0 - 3m setback.
- The site achieves 13,210m² (67.10%) landscaped area on the ground plane, comprising courts, passages, accessways, parks and the channel walk.

- The large area of deep soil planting and reduced site coverage (32.9%) compared to the existing factory on the site (45.6%) provides the opportunity for additional tree planting to realise the design concept for the site and to further counteract the new built forms on the site.

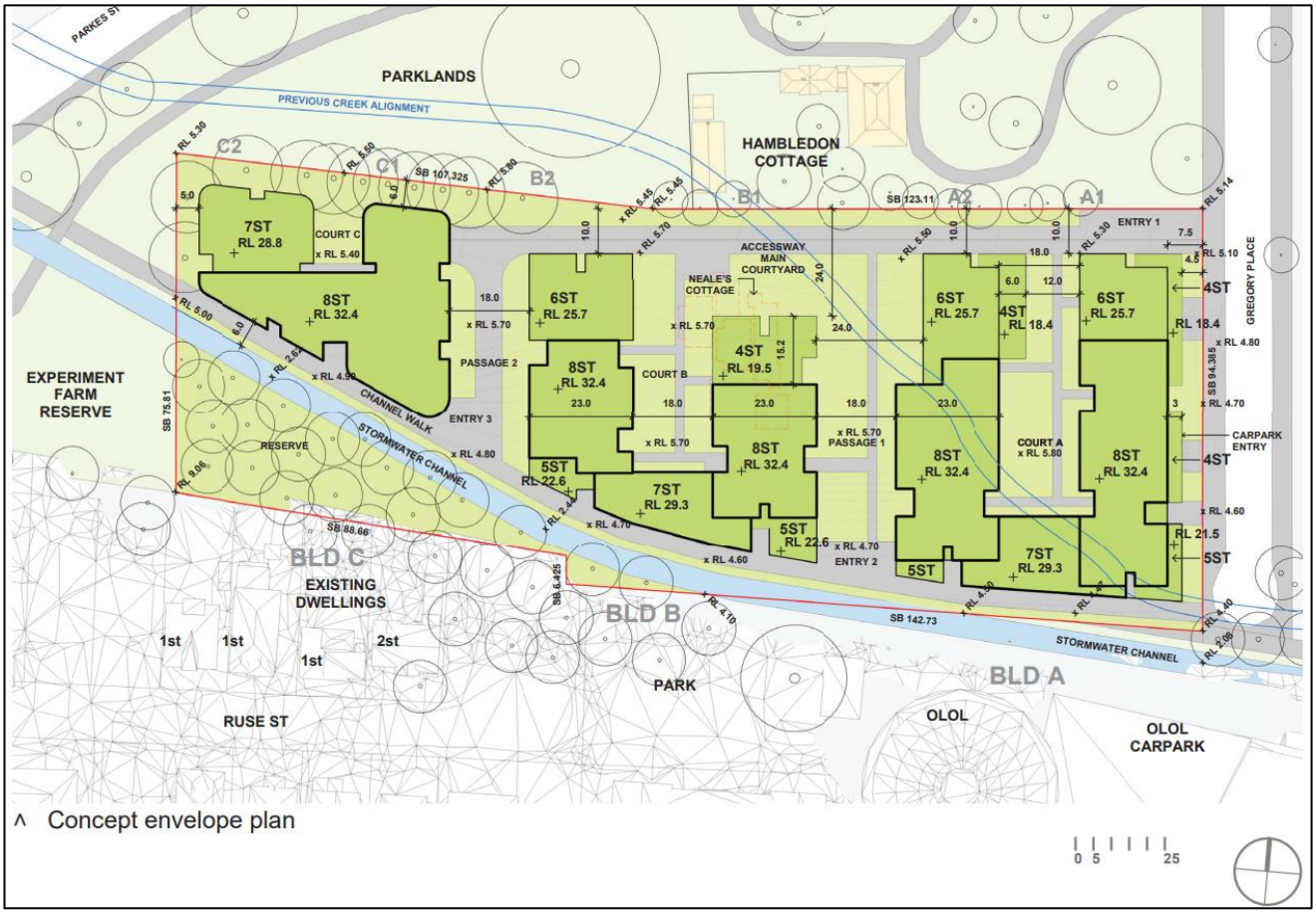


Figure 27: Concept Envelope Plan

6.3.3 Building Height

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 3.7m – the Clay Cliff.

The building heights vary within the area and vicinity of the site, with residential apartment buildings up to a height of RL 49.02 to the south of the site along Alice Street and OLOL adjoining the site which has a height of RL 44.50.

The existing factory buildings on the site vary in height up to RL 28.70. The existing tree planting along the west and northern boundary largely screen the taller forms on the site.

Building height has been distributed across the site to adjust to the surrounding context, including the colonial cottages. The distribution of height has been subjected to detailed review by Heritage NSW and Peer Review and is consistent with the outline concept plan supported by the HCAC on 2 March 2021 to proceed to a Stage 1 Development Application. This progressive review and guidance process through Heritage NSW has been a

successful and important process to assist and achieve the requirements of the SCC schedule in considering the appropriate building height.

The built form varies in height from RL 18.40 to RL 32.40, adjusting 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 the street wall, 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.

6.3.4 Connecting to Country

The HCAC advice to embed Aboriginal cultural heritage of the area into the design, in collaboration with the local Aboriginal community was explored, including the interpretation of the original creek line. In response, the Fulcrum Agency and Yerrabingin, have worked together to co-design opportunities for interpretation of Australian First Nations history into a narrative within the natural and built landscape, and manage community consultation with the local Aboriginal community to develop principles for connecting with Country. The Fulcrum Agency work informed the design workshop with the indigenous groups, and post the workshop, Yerrabingin produced a design guide for future design integration, which is included at Appendix L.

In addition to this, Dominic Steele Consulting, who is an experienced heritage consultant, was engaged to prepare a detailed Aboriginal and Non-Aboriginal Heritage Impact Assessment to specifically consider the significance of the site pre-contact.

A set of design principles and an opportunities plan have been developed as part of this interpretation process. The design principles, developed to inform the concept and for further exploration as the project develops include:

1. **Agency**
   Ensure appropriate community engagement and decision-making in the ongoing governance and development of the development. Engagement should be based upon shared knowledge exchange between technical experts and cultural authorities.

2. **Remuneration and ICIP**
   Protect and respect Cultural Knowledge. Remunerate Knowleddge Holders for their cultural expertise

3. **Dialogue and Restoration**
   Look for opportunities to restore landscape and encourage dialogue across shared histories. This is as much about habitat restoration as it is about repairing relationships with Country.

4. **Care**
   Seek opportunities to embed custodianship within the project plan. Look for economic opportunities through ongoing landscape care and maintenance.

5. **Language and Naming**

   Optimise opportunities for use of language in the naming of places, wayfinding and historical interpretation of the area.

6. **Truth Telling**

   Find opportunities to tell stories of dispossession, frontier conflict, and other painful but important aspects of Australian history. (The nearby Blacktown Native Institute for example has obvious linkages to the Stolen Generation).

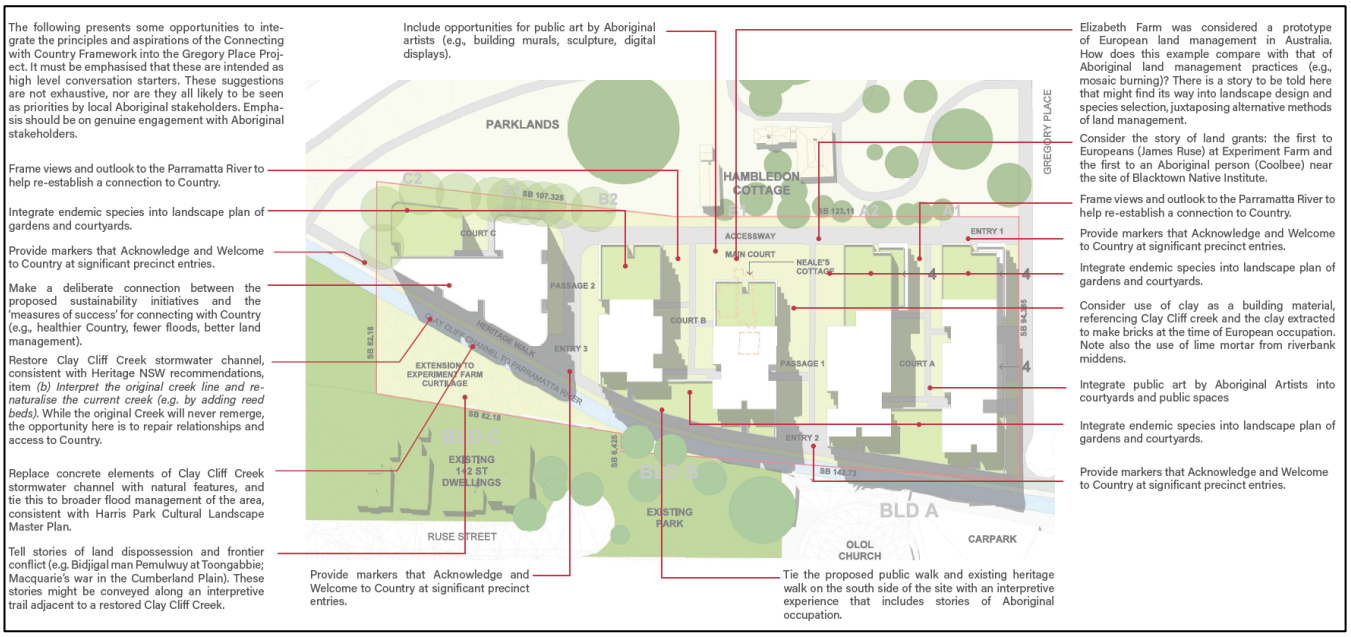


Figure 28: Opportunities Plan (*source: Fulcrum Agency*)

6.3.5 *Illustrations*

While the application is for concept approval and not for development, extensive work has been undertaken on understanding how future development will interface with its context. Illustrations have therefore been prepared utilising the potential future materials and finishes that will be subject to a future development assessment process. The following illustrations have been prepared by Mark Gerada and are included within the attached design report. Note, the illustrations present the feel and desired character rather than the actual architectural detail which will be subject to future applications.

Figure 29: Main Courtyard visualisation (*source: Mark Gerada*)

Figure 30: Channel Walk (*source: Mark Gerada*)

Figure 31: Gregory Place (*source: Mark Gerada*)

6.3.6 Building Code of Australia Compliance

A Building Code of Australia (BCA) Compliance Report has been prepared by Design Confidence, to identify the extent to which the architectural design documentation complies with the relevant prescriptive provisions of the BCA. The report is included at Appendix N and is limited to the information provided to support a Concept application.

A detailed analysis is provided in the attached report at Section 3. In cases where prescriptive non-compliance occur or where further design detail is required, a detailed analysis and commentary is provided. Refer to Section 4. Where potential non-compliances occur, such instances should not necessarily be considered BCA deficiencies, but rather matters which need to be considered by the design team, the certifying authority and all other relevant stakeholders as detailed design progresses.

With respect to the assessment undertaken the following areas in particular need further review as the project develops into further development applications:

Item	Description	Responsibility
1	The following building elements and their components must be non-combustible – i. External walls and common walls, including all components incorporated in them, including the façade covering, framing and insulation; ii. The flooring and floor framing of lift pits; iii. Loadbearing internal walls;	Project Architect

	iv. iv. Non-loadbearing internal walls where they are required to be fire-resisting	
2	A test report from a Registered Testing Authority must be provided to certify that the façade / external walls achieve compliance with BCA FP1.4 and FV1.	Project Architect/ Façade Engineer
3	Location of exits and discharge configuration of the fire isolated stairways, discharging within the building is to be detailed to allow for further design review	Project Architect
4	Subject to further review of the scheme as it develops in subsequent stages, the project as currently designed has the ability to comply with the Building Code of Australia	Project Architect

Table 11: BCA Requirements

6.3.7 *Accessibility*

An Access Design Report has been prepared by Design Confidence, to assess how the development complies with the relevant accessibility requirements. The report is included at Appendix M. The purpose of the report is to identify the extent to which the architectural design documentation complies with the accessibility provisions of the National Construction Code –Building Code of Australia Volume 1, Edition 2019 Amendment 1, as are principally contained within Parts D3, E3.6, F2.4 and F2.9.

As the proposal is for a concept application, it is noted that there is generally insufficient information to enable a complete assessment of compliance. Notwithstanding, the assessment concludes that the "*subject development is capable of achieving compliance with the accessibility provisions of the BCA, either by complying with the prescriptive requirements or via a performance-based approach".*

Further, compliance can be achieved either by meeting the deemed-to-satisfy requirements of the BCA, as are principally contained within Parts D3, E3.6, F2.4 and F2.9, or via a performance-based approach.

Further assessment will be undertaken as the project develops and more detailed design occurs. In this regard, Design Confidence identify the following items which should be reviewed in subsequent applications, as identified below:

Item	Description	Responsibility
1	Further detail in relation to the proposed levels along the pathway and podium of each building to determine accessibility to and within each building part.	Project Architect/Landscape Architect
2	Distribution of allocated car spaces is to be provided, to ensure the minimum number of accessible car spaces will be met.	Project Architect
3	As design progresses, further details shall be provided to ensure compliance with the requirements of the BCA / AS1428.1-2009 is achieved, such as: • Stairway details; • Signage details; • Door schedule and door hardware; • Glazing schedule and visual indicators to glazing.	Project Architect

Table 12: Accessibility Requirements

6.4 Environmental Amenity

The concept has been designed to achieve high levels of environmental amenity and sustainability through the design, layout and landscape and outdoor space focus. This section demonstrates how, at the concept stage, the proposal achieves high environmental amenity.

6.4.1 Residential Amenity

The development provides excellent amenity to all residents, with large open spaces at ground level and on roof terraces that receive direct sunlight between 9.00am and 3.00pm at mid-winter due to their northern orientation.

One of the primary guiding principles of the proposal, endorsed by the HCAC, is to extend the orthogonal grid of Harris Park onto the site, with buildings oriented to the north, with apartments facing east and west considered acceptable. The ADG, 3B - Orientation acknowledges that "northern orientation is an important consideration, but it must be balanced", taking into consideration desired streetscape character and contextual constraints.

The proposal achieves high levels of environmental amenity through the design as follows:

- 70.40% (340/483) apartments achieve in excess of 2 hours of direct sunlight to all to living rooms and private open spaces between 8.30am and 3.30pm at mid-winter which meets the guidelines of the ADG, which recommends 70%.
- 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.
- All living rooms achieve the minimum width of 3.6m for 1 bed apartments and 4m for 2 and 3 bedroom apartments. All apartments have private open spaces that are accessed directly from the living and have external areas of 8m² for 1 bed apartments, 10m² for 2 bed apartments and 12m² for 3 bed apartments.
- 60.5% (292/483) of apartments are naturally cross ventilated utilising corner ventilation or through ventilation. The ADG guidelines recommend 60% (289.8) apartments are naturally cross ventilated.
- Communal open spaces at ground level are extensive spaces for passive recreation and social interaction. Roof terraces are active spaces and have individual characteristics that appeal to a broad range of users including wellness spaces, BBQ and dining, viewing platforms, harvest gardens and a child play space.
- The site achieves 10,210m² (52.4%) landscaped area on the ground plane, comprising courts, passages, accessways, parks and the channel walk, with 5,700m² (29.3%) landscaped deep soil.
- Communal open spaces achieve excellent direct sunlight at mid-winter, well in excess of the minimum guideline (12.5% of the site area) of 2 hours between 9am and 3pm at mid-winter, as recommended by the ADG due to their northern orientation.
- Ground level apartments are elevated 1m above natural ground level which ensures visual privacy is achieved and are accessed directly from the street, passages, walkways and courts.

6.4.2 Overshadowing Impacts

The concept has been carefully designed, and building footprints carefully located to maximise the northern exposure to open space and apartments. The location of Clay Cliff to the south of the site provides the opportunity to locate massing towards the south of the site given the minimal development that will be

impacted by overshadowing. Clay Cliff is a natural barrier that separates the site at the lower level, from the development to the south located at the higher level.

The architectural plans included at Appendix J provide an assessment of the potential shadow impacts of the proposed development on surrounding land. The analysis provides hourly shadow diagrams from 9am to 3pm on 21 June. The following observations are made:

- There is a small existing pocket park above Clay Cliff Creek immediately to the west of the OLOL. There is no shadow impact to the park between 10.15am and 1.45pm. Even when there is some shadow, this is very minor.
- Our Lady of Lebanon Cathedral is located to the south of the site, above the Clay Cliff. There is no shadow impact to the church between 9am and 2.30pm. However, the shadow impact does not impact the roof, and where stain glass windows may be overshadowed, it is noted that stain glass only requires daylight rather than direct sunlight.
- Experiment Farm is located to the south west of the site, which includes the cottage itself, in addition to the surrounding reserve. There is no impact from overshadowing to Experiment Farm between 9am and 3pm, with some minor overshadowing to the reserve between 9am and 11am.
- The east side of Gregory Place includes dwelling houses. There is no overshadowing to these dwellings from the proposed development between 9am and 2.45pm.

Given the minor impact of overshadowing the diagrams are not replicated here, but can be viewed at drawing numbers CD3001 and CD 3002 of the architectural plans at Appendix J.

6.4.3 *Wind Impacts*

A Desktop Environmental Wind Study has been prepared by SLR Consulting Australia to assess the wind impact of the proposed built form sought by the concept application on the immediate surrounds of the development. The Study is included at Appendix P.

Local Wind Climate

On the basis of long-term wind records obtained from the Bureau of Meteorology weather stations at Bankstown Airport, SLR has determined that key prevailing wind directions of interest are the northeast and south/southeast for summer/early autumn and west quadrant winds for winter/early spring.

Future Wind Environment

In terms of the *future* wind environment with the proposed development, the following features are noted as being of most significance:

- The proposed development's main residential blocks are set back from its street frontage with extensive landscaping (large trees) planned.
- Areas potentially requiring wind mitigation are largely within the site, especially the elevated roof terraces, link terraces and through site links.
- Windbreak recommendations, all of which will be implemented in the design of the development, have been made to assist in ameliorating potentially adverse winds identified in this study. Accordingly, all affected areas should be able to comply with the recommended wind acceptability criteria – refer Section 7 and Figures 8 for details.

- During the detailed design phase of the project, once the design of the various building facades is finalised, further modelling could be carried out to confirm zones of the building, by height and by plan view location (e.g. which building corners), where wind mitigation (i.e. beyond the standard balustrade height) may be beneficial if it is intended for balconies and terraces to be used all-year-round, also noting that the strongest westerly winds occur during winter. It is recommended to complete a detailed 3D CFD Simulation Modelling rather than Wind Tunnel Testing, given the issue of balcony scaling at typical 1:400 wind tunnel test scales.

The report demonstrates that with appropriate mitigation measures, the footprints and elevations sought by the concept application can achieve acceptable levels of wind impact. Further detail on how these mitigation measures are achieved, such as balustrade height and tree planting will be further considered under future applications for development.

6.5 Visual Impact

A Visual Impact Statement (VIS) has been prepared by Taylor Brammer to assess the proposal within the context of the site and its surrounds. The Report is included at Appendix Q. The VIS addresses the visual impact of the proposal in relation to the existing landscape character and built form of the place, and mitigation measures that are proposed.

6.5.1 Development Context and visual catchment

Based on the landscape and built form characteristics of the place, seven viewpoints were selected so as to assess the impact of the proposal. These viewpoints acknowledge the complexity of the place with the multiple values of pre-European, Colonial and Post WWII being expressed in the vicinity and on the site.

The landscape heritage curtilages of Hambledon Cottage and Experiment Farm Cottage demonstrate the different landscape character of these colonial SHRs. The landscape character of Hambledon Cottage is distinguished by mature plantings, this character contrasting to the more open character of the Experiment Farm Cottage, which forms part of the open parkland character of James Ruse Reserve.

The visual catchment is summarised as follows:

- **North** – Hambledon cottage and James Ruse Reserve
  James Ruse Reserve forms part of the vegetated character and form of the visual curtilage around Hambledon Cottage. The reserve extends to the west and incorporates the visual curtilage of Experiment Farm Cottage

- **South** – Clay Cliff Creek
  Clay Cliff Creek is located along the southern boundary. Clay Cliff Creek is denied public access with the exception of the western portion of the channel that forms part of the subject site. It is distinguished by dense vegetation. OLOL is located on top of the creek and is a visual characteristic of the area. The area above the Creek is also defined by residential flat development ranging in height from 4 to 8 storeys.

- **East** – Gregory Place
  The residential character zone to the immediate east of the site on Gregory Place consists of single and two storey residential development. The landscape to the periphery of the residences is supplementary to the built form. Due to the power lines to the eastern side of Gregory Place, there are no street trees

to this side of the street with the result that the built form of the housing is visually prominent within the streetscape context. The present housing is typical of the subdivision patterns and the one to two storey scale of the housing in this area.

- **West** - Experiment Farm Cottage

  Experiment Farm Cottage is located on the rise to the southwest of the subject site. As such it is visually separated by the extensive vegetation that forms the landscape character to Clay Cliff Creek. Experiment Farm Cottage adjoins the western end of the site. From Experiment Farm Cottage the defined visual cone and heritage curtilage when viewing to the north from the house's veranda, the curtilage includes the built form of the Parramatta CBD and visual links to the location of the Parramatta River from this elevated position.

6.5.2 *Visual Impact and Mitigation*

Selected viewpoints were selected based on public viewing points around the site. These public viewing points were selected on the basis that the points are on public streets (Gregory Place, Hassall and Parkes Streets) that range from residential use to major traffic arteries to the Parramatta CBD. Other viewing points were in public reserves (James Ruse Reserve) or took in areas that were close to the proposal and combined with the Experiment Farm Cottage. Viewpoints to the south of the proposal from public viewing points were obscured by dense vegetation and were therefore not ranked.

The seven viewpoints are illustrated, in the context of the proposed built form and elevation, below:

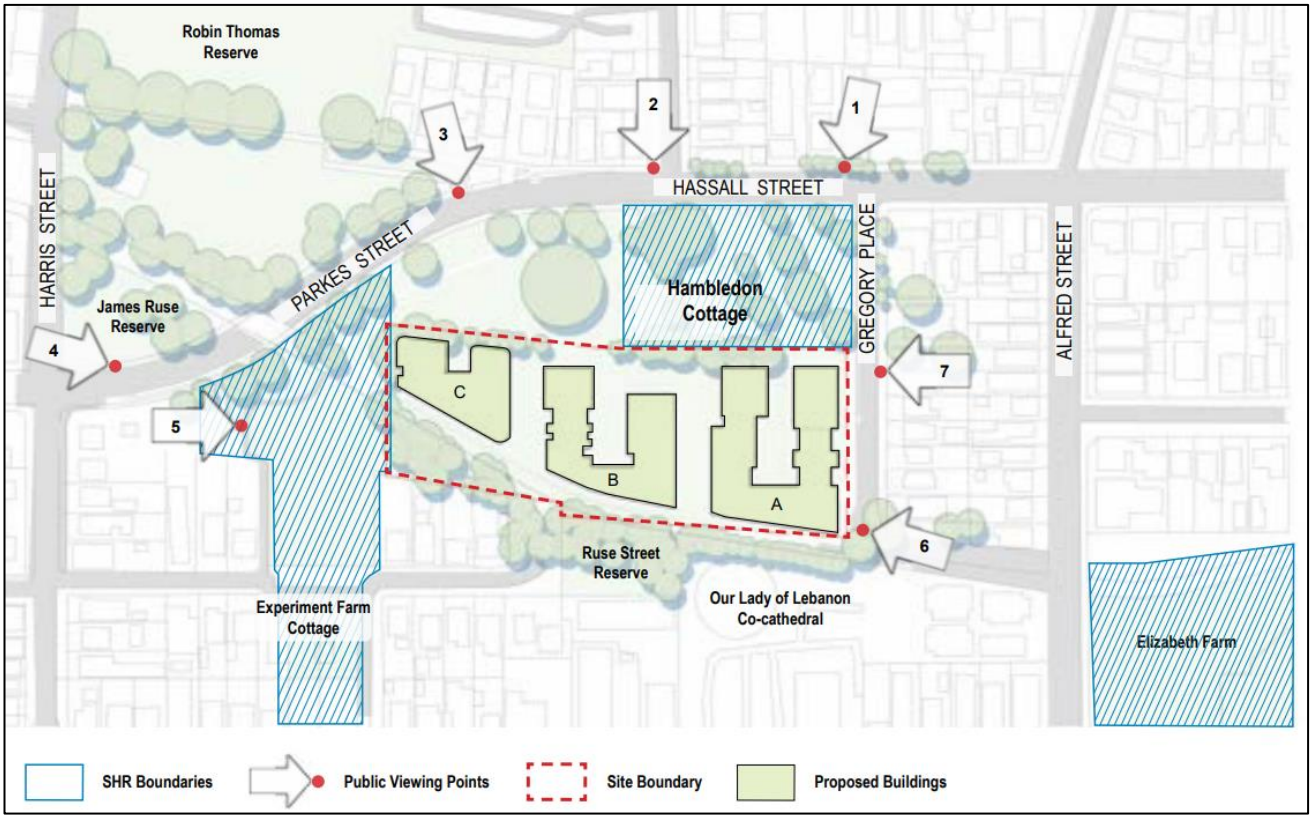


Figure 32: Key public viewing points

The visual impact of the proposal is in general moderate. The extensive existing landscape plantings around and on the site provide a substantial and immediate vegetated form to the proposed multi storey residential structure. These vegetated features are an integral part of the evolution of the place and reflect the complex layering of the site being the result of a combined interaction of productive agricultural landscapes and post war protection of the settings of each of the two historic colonial cottages of Hambledon and Experiment Farm in particular.

Supplementary planting as indicated on the landscape plans will complement the existing vegetation and contribute to the visual vegetated amenity of the place. The new landscape measures instigated in relation to proposed built form over time will provide a vegetated amenity with a Moderate Visual Impact of the proposal. The principle of the landscape visual amenity of the parklands is retained.

The proposal through its highly articulated form results in three buildings that allows for views to be gained from the north and south, thus forming visual breaks through the site. The extensive landscape of the site being over 80% of the ground level, landscape terraces and green roofs to the upper levels provides opportunities for a broad landscape treatment that provides a positive contribution to parkland character surrounding the site.

The views taken from public viewing points are as noted representative of persons moving around the site and as laid out the potential effect of the proposal to the range of edge conditions that exist. The viewpoints layout the following detailed outcomes:

To Viewpoint 1, the addition of trees and landscape to the proposal will support in complementing the existing and proposed vegetated form surrounding the site by attenuating the visible built form.

To Viewpoint 2, the landscape measures as noted will provide an appropriate vegetated form that will complement the landscape heritage values of Hambledon Cottage.

To Viewpoint 3, the landscape measures will provide an appropriately scaled vegetated form combined with the landscape treatment to the proposal of green terraces and roofs.

To Viewpoint 4, the lower portion of the site is obscured by the existing trees with the proposed level of RL 31.9 of the western building to be seen above the existing vegetation. The proposed landscape treatment to the upper portion of the building will assist in the reduction of the skylining effect and will form 20 % of the view from this location

To Viewpoint 5, the built form will be seen from the Experiment Farm Cottage. Built form of Building C will be more apparent from this viewpoint as the current level of RL 28.8 of the former industrial building will be exceeded in part by a further level at RL 31.9 of the proposal. This higher level will be viewed at an angle from the Experiment Farm with much of this built form being identified by the landscape terrace at RL 28.8 and the periphery of the green roof at RL 31.9 of Building C. It is noted that the view corridor from Experiment Farm Cottage veranda does not take in the extent of Building C as seen from the lower portion of the Farm as this portion is obscured by existing vegetation when viewed from the Experiment Farm Cottage Veranda. It is noted that the distant view from the veranda of Experiment Farm Cottage takes in a number of high-rise buildings of the Parramatta CBD with a substantial vegetated form of the trees associated with James Ruse Reserve to the foreground. Given the proximity of Building C to the Farm, further consideration should be made to ameliorate the built form by the use of vertical vegetation to the façades that are seen from the Experiment Farm Cottage SHR.

Figure 33: View Point 5 – existing

Figure 34: View Point 5 – Proposed

Viewpoint 6 and 7 at Gregory Place have high/moderate visual impact with the replacement of a 1-2 storey industrial building with a 6-8 storey residential built form. This form is setback 6 metres that allows for landscape planting to the private open spaces that face Gregory Place. A 3 metre landscape setback at Level 4 will provide a residential scaling to the built form when viewed from Gregory Place. To further reduce the visual impact, appropriately scaled street trees of between 10 – 15 metres mature height with under-grounding of the existing wires on the eastern side of Gregory Place is essential.

Figure 35: View Point 6 – existing

Figure 36: View Point 6 - Proposed

Figure 37: View Point 7 – existing

Figure 38: View Point 7 - Proposed

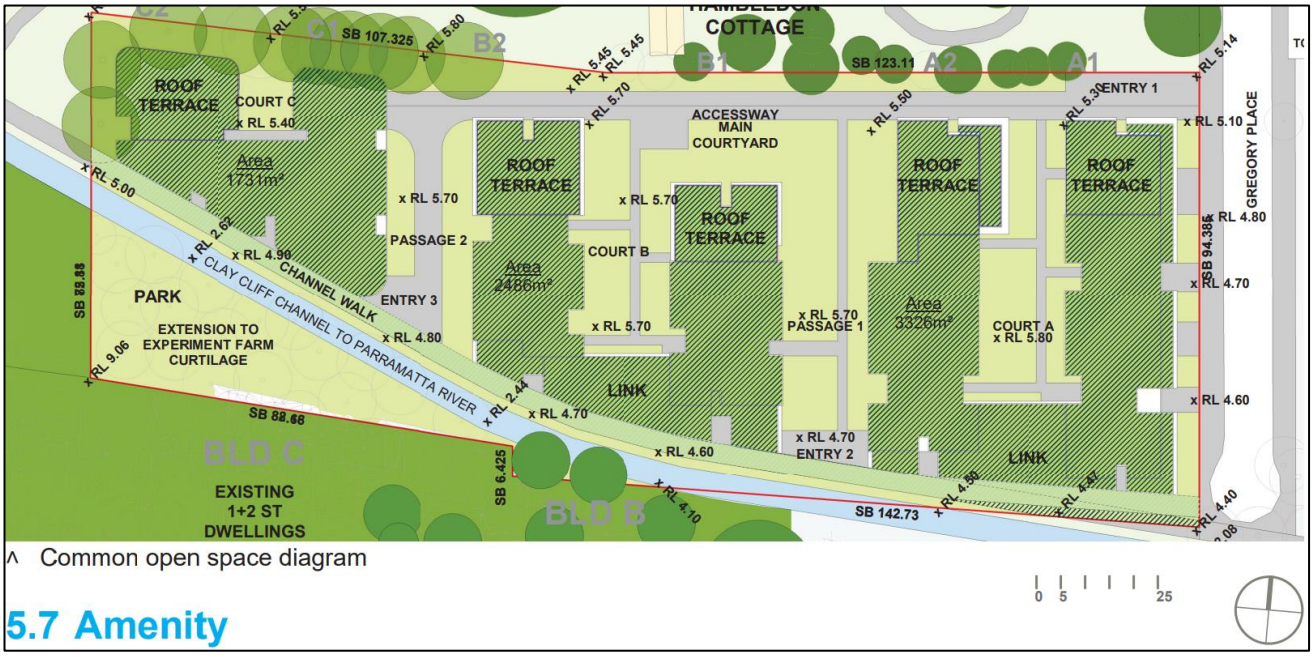
6.6 Public Space

The concept has been designed to specifically sit within its landscape setting, ultimately supporting over 10,000sq.m of open landscaped public space on the ground floor comprising courts, passages, accessways, parks and the channel walk.

A detailed landscape plan has been prepared to illustrate the amount of access to and quality of public spaces, encouraging permeability and accessibility to passive recreation and social interaction opportunities. The open space and landscaping strategy encourage the safe, welcoming and interesting open spaces as follows:

- Create a main central courtyard around the location of the former 'Neale's cottage'. Create opportunities for public art, murals, sculptures or digital displays.
- Restore Clay Cliff Creek stormwater channel, consistent with Heritage NSW recommendations i.e. interpret the original creek line and re-naturalise the current creek (e.g. by adding reed beds). While the original Creek will never remerge, the opportunity here is to repair relationships and access to Country.
- Create a new public walk and tie this to the existing heritage walk on the south side of the site with an interpretive experience that includes stories of Aboriginal occupation.
- Create two passageways, creating north south through links from the accessway and Hambledon cottage to the creek walkways.
- Create three courtyards for passive recreation and gathering.
- North facing open space supports significant collar access. Combine this with selective tree species for shading in summer.
- Extend the Experiment Farm curtilage with land to the south west of the site, on the south side of the creek.

The below figure illustrates the proposed public open space throughout the project. Also refer to the Landscape Concept Masterplan under Section 6.7.2 and Appendix T, and the Visualisations under Section 6.3.5.



^ Common open space diagram

5.7 Amenity

Figure 39: Open Space Diagram

6.6.1 Crime Prevention Through Environmental Design

A Crime Prevention Through Environmental Design (CPTED) Report has been prepared by Taylor Brammer Landscape Architects, which is included at Appendix R.

The CPTED report has been prepared to review the design of the site in its context and consider how the proposal achieves the principles of CPTED to minimise the opportunity for crime and encourage a positive outcome for the proposal. The elements of CPTED considered within the report relate to:

- Surveillance
- Access Control
- Territorial Reinforcement
- Activity and Space Management

The design and layout of the sites has been assessed against the requirements of section 4.15 of the EP&A Act and the principles of CPTED and has been found to be an acceptable design subject to final design details at later consent periods. The key opportunities to minimise crime were identified as follows:

Surveillance

1. Trees planted throughout the site should have a lower canopy of at least 1.8m above natural ground level at inception to provide casual surveillance opportunities through the proposal.
2. No shrub planting over 1m should be used within the site or along pathways through the site
3. Lighting shall be installed along Clay Cliff Creek and along all pedestrian pathways in accordance with AS 1158.1. Lobby entries should be identified by well lit canopies that have an appropriate lux level in accordance with AS 1158.1
4. CCTV should be installed throughout the site including along Clay Cliff Creek, within car park areas, bin enclosures, bike storage areas, and pedestrian pathways between buildings
5. Windows, doorways and open spaces associated with the passageways and courts are to provided so as to encourage surveillance and natural sight lines into and out of buildings.
6. Duress alarms could be considered as part of any future fit-out of the child care centre and other uses.

Access Control

1. Bollards shall be installed at regular intervals preventing cars from accessing pedestrian areas. This may include retractable bollards to allows for deliveries and events as necessary.
2. Signage shall be installed at pedestrian access points and road crossings to emphasise pedestrian priorities and a sense of community.
3. Waste enclosures shall be securely fenced and locked when not in use. Waste enclosures to be managed by the on site manager.

Territorial Reinforcement

1. Entry and exit points to the car park shall be signposted and identify the area as private property.
2. Signage shall be incorporated within the facility to advise people not to leave valuables in their car.
3. Pedestrian crossings shall be clearly marked to identify these areas to motorist and well maintained.

Activity and Space Management

1. On site managers shall undertake regular walk-throughs of the site to ensure the site is kept in a clean and tidy manner and to identify and remove graffiti as soon as possible but ideally within 24 hours.
2. Waste enclosure areas shall be kept in a neat and tidy manner.

3. Way-finding / directional signage shall be installed throughout the centre to direct people around the site, as necessary. Naming of residential buildings are important for site interpretation and wayfinding.
4. 'Park Smarter' signage (or similar) shall be placed around the site to help minimise theft from vehicles.
5. Emergency numbers and location of the manager's office should be clearly identified at the entry to each building.

The Report notes that a periodic review of the development should be undertaken by the owner once operating. This will be required to ensure it continues to achieve the intent and function originally envisaged. This should be undertaken regularly and in the event of any issues arising at the site to ensure the development appropriately responds to the surrounding environment and to the needs of the users to limit opportunities for crime at the site.

The principles and opportunities to minimise crime will be further explored as the project advances to detailed design stages.

6.7 Trees and Landscaping

An Arboricultural Impact Assessment and Tree Management Plan has been prepared by Horticultural Management Services (Appendix S), which identifies the trees within and or adjoining the site, provides information on their individual current health and condition, determine their remaining life expectancy and significance in the landscape, and assesses their suitability for retention/preservation or removal.

The application is also supported by a Landscape Plan and Strategy, prepared by Taylor Brammer Landscape Architects (Appendix T), which forms a core component of the placemaking principles adopted for the project. The landscape concept plan for the site has been developed with the design principles of the draft strategic framework in mind, and has the adopted a number of characteristics, discussed below, with input from the State Design Review Panel and local indigenous workshops.

6.7.1 Trees

The Arboricultural Impact Assessment and Tree Management Plan identifies the trees within and or adjoining the site, provide information on their individual current health and condition. A comprehensive site inspection undertaken on Friday 27th May 2022 and a tree assessment was undertaken using criteria based on the Tree Risk Assessment Guidelines by the International Society of Arboriculture. This involves inspection from ground height and includes only the external features of the trees. Trees on adjoining sites were assessed from within the site boundaries only and only within 5m of the site boundaries.

In total, 223 trees were surveyed. After close visual and physical investigation of the trees condition, results from the field investigations indicated the following:

- The site is heavily weed infested with self-seeded nuisance environmental weed species being Large Leaf Privet (Ligustrum lucidum) African olive (Olea europaea subsp. Cuspidata), European Hackberry (Celtis australis) and Canary Island Date Palm (Phoenix canariensis). As per council's Tree Management Policy, and DCP 2011, these nuisance environmental weed species are exempt and may be removed without further consideration.
- Significant trees on the site and adjoining (65 trees) are sufficiently distanced to be safely retained, protected, and managed (refer to attached Report).

- Twenty-one (21) non-endemic planted trees species will be impacted by the proposed development, of which six (6) are not exempt under the DCP (2011) or Sydney Water Act (1994).
- Of the 6-requiring approval, All bar one individuals were assessed in the Horticulturist report as having nil to low ecological landscape significance based on life expectancy, structure and connectivity within the landscape. The remaining species determined to have medium ecological significance is a Lemon scented Gum (Corymbia citriodora), which is regarded as a weed within the wider Sydney Region due to its invasion of open woodland areas from deliberate plantings.
- The non-endemic planted species to be impacted as a result of the proposal do not constitute as habitat for threatened entities beyond opportunistic foraging.
- Owing to the sites position within the landscape, lack of indigenous vegetation and habitat features present within the site, impacts to threatened species or ecological communities or their habitat are unlikely to occur.
- The proposal will not impact indigenous vegetation, vegetation communities or reduce important available habitat for threatened entities.

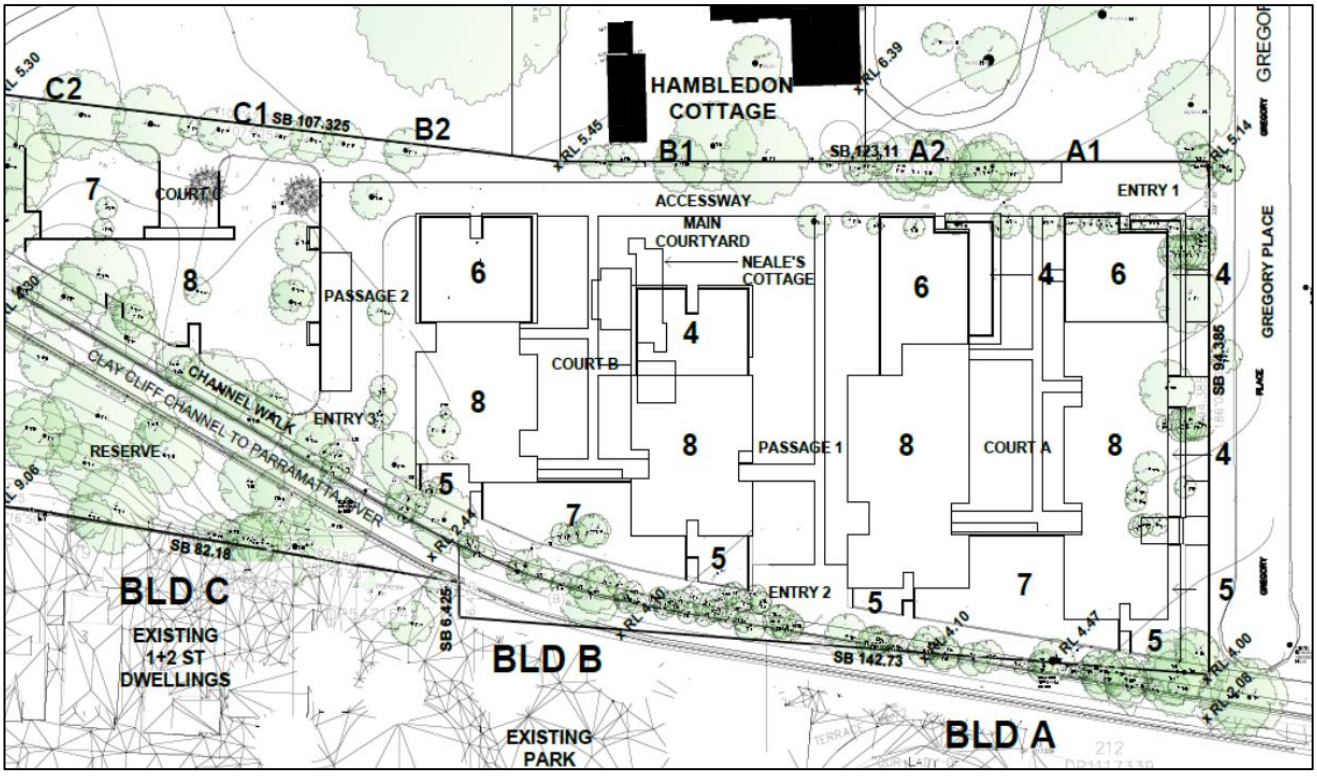


Figure 40: Site trees location based on the proposed development layout

6.7.2 *Landscaping*

The rejuvenation of the 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 landscape concept plan for the site has been developed with the design principles of the draft strategic framework in mind, and has 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.

Specifically, the landscape concept illustrates how the rejuvenation of the landscape is capable of creating open space that is compatible with its context due to the following characteristics:

- 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.

Figure 41: Landscaping Concept Masterplan

In accordance with the SEARs, the attached plan includes a concept site-wide landscape plan that details the indicative site planting, that demonstrates how the concept will contribute to the long term landscape setting, mitigates the urban heat island effect and maximises the urban tree canopy. An extract is included below

The landscape strategy proposes planting to contribute to the setting by understanding the character of landscaping within a broader setting.

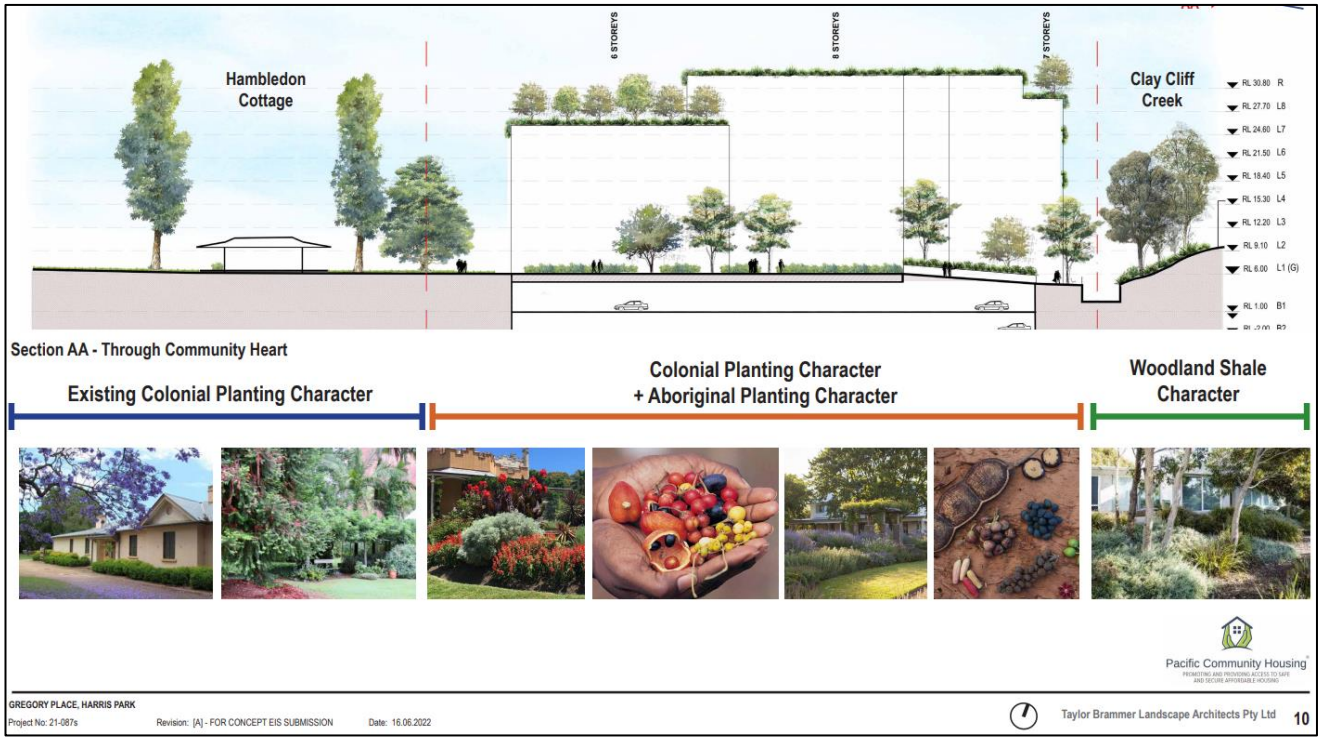


Figure 42: Landscape Concept Layers

A list of planting species and planting schedule is included in the attached Concept Landscape Plan.

6.8 Ecologically Sustainable Development

An Energy Efficiency and Ecologically Sustainable Design Report has been prepared SLR Consulting Pty Ltd, and is included at Appendix U. The Report provides a qualitative Ecologically Sustainable Design (ESD) assessment, including energy efficiency, for the proposed development, and has been prepared in accordance with the issued SEARs, noting that the project is at concept application and does not seek consent for development at this stage.

Overall, positive ESD and energy efficiency features are currently in place in several design areas, incorporating the following:

- The proposed development will incorporate passive and active energy saving measures such as operable windows to enhance natural ventilation through serviced apartments, where appropriate;
  - 65.1% of the proposed residential units will be naturally cross ventilated.
- The form dictated by the site has been designed to maximise the solar access of residential units;
  - 70.7% of the living rooms and private open spaces of the proposed apartments will receive a minimum of 2 hours direct sunlight between 8.30 am and 3.30 pm at mid-winter.

- Incorporation of thermal mass.
    - Concrete slab construction is proposed for all floors throughout the development - concrete has amongst the highest thermal mass capacity of a range of common building products. External walls, structural internal walls and slabs of the proposed development should be predominantly high thermal mass materials.

It is recommended that with the inclusion of the below systems the development will exceed the Water and Basix Energy requirements for Climate Zone 56:

- LED energy efficient lighting for all residential units;
- Heat pump hot water for residential apartments;
- Efficient individual reverse cycle 1-phase air-conditioning system (zoned) of 4-star energy rating for all apartments.
- The installation of a solar PV system;
    - A 500 kW PV solar system is recommended to significantly minimises greenhouse gas emission
    - reflecting the goal to achieve net zero emissions.
    - A 500 kW PV solar system will offset approximately 693.5 MWh/year of energy usage.
    - The estimated greenhouse gas CO2 emission saving is approximately 586,670 kgCO2/annum
- Minimum 4.5-star energy efficient refrigerators;
- All residential shower heads are 4-Star (>4.5 but ≤6 Litres per minute);
- All residential toilet flushing systems are 4-star;
- All residential Kitchen taps are 6-star;
- All residential bathroom's taps are 6-star;
- Dishwashers and clothes washers to have a minimum 2.5-star water efficiency rating; and
- Provision of 20,000 L rainwater tank for irrigation;

The following recommendations have been made to improve upon the existing key sustainability elements of the proposed development:

- Water efficient bathroom and kitchen fittings;
    - All common area toilet flushing systems are at least 4-star
    - All common area taps are at least 5-star
- Light efficiency measures in the carpark using motion sensors;
- Low levels of volatile organic compounds (VOC) paints and floor coverings and low formaldehyde wood products where possible; and
- Car spaces for small or low emission cars.
- The provision of bicycle storage spaces within the development, although not a requirement of BASIX, will ensure the development become a more sustainable development in a holistic sense. Bicycle parking is provided at rates meeting the requirements of Parramatta DCP 2011;
- Landscaped areas are within the residential development throughout the designated communal areas. Proposed planting provides added cooling during the summer months through the leaf transpiration process and is also useful for wind amelioration;
- Plant species within the development would be predominantly indigenous species that can tolerate low water to reduce maintenance requirements;

Recommendations regarding the mechanical ventilation system, domestic hot water, other appliances, operational waste, etc, have also been made within the body of the report.

These features will help to achieve significant reductions in the energy and water required by the development both in building and operation, as well as ensuring that the residential units are more pleasant spaces to reside.

It is recommended that ESD initiatives continue to be developed and implemented throughout the course of the project.

6.9 Traffic, Transport and Accessibility

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.

In accordance with the SEARs, and in support of this SSD Concept application, Traffic Solutions Pty Ltd has prepared the following documents which address the traffic, transport and accessibility matters:

- Transport and Accessibility Impact Assessment (Appendix X)
- Draft Construction Traffic Management Plan (Appendix V)
- Draft Green Travel Plan or equivalent (Appendix W)

6.9.1 Existing Environment

The site is within a highly accessible area, close to significant public transport, jobs and services, and well connected to Sydney and broader Greater Sydney. The site is approximately 700 metres from Parramatta, Harris Park, 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.

There is already a good network of paths connecting the site to the Parramatta CBD, with future desired connections along the Clay Cliff Creek walkway. This includes opportunities within the future development of the site to provide connections along the creek improving connectivity for the broader area to the Parramatta CBD.

6.9.2 Parking

Noting that the application is for concept only at this stage, the project seeks to provide parking and loading across two basement levels. Future applications for development will demonstrate that the geometric design requirements for car park layouts will comply with the 'Australian/New Zealand Standard, Parking Facilities Part 1; Off Street Car Parking (AS/NZS 2890.1) of 2004 and Australian/New Zealand Standard, Parking Facilities Part 6: Off street Parking for People with Disabilities of 2009.

The concept proposal seeks to facilitate 483 dwellings, supported by two basements levels that will provide 634 spaces, including 566 parking spaces to support the development and 68 visitor spaces. The basement also provides a loading area.

The design of the loading area will be in accordance with AS 2890.2:2002 for medium rigid vehicles to cater for garbage trucks. Similarly, the number of parking spaces, and loading dock are indicative only at this stage. The number of parking spaces motorcycles, bicycle racks will be determined upon detailed design for development under the next stage of development.

6.9.3 Servicing

A separate basement loading/service area is provided with an independent vehicle access separate to car access to the basements. This service area is provided for the collection of waste and for loading/unloading of resident's furniture and delivery of goods, and deliberately arranged to avoid conflict between regular vehicles and rigid vehicles.

6.9.3 Traffic generation and potential impacts

Based on the Roads and Maritime Services Technical Direction '*Guide to Traffic Generating Developments, Updated surveys TDT 2013/14'* of May 2013, which has been used to estimate and calculate traffic generation associated with the proposal, the proposed development has the potential to generate approximately 92 and 72 vehicle trips in the morning and evening peak hours, respectively.

Data on the traffic movements in the vicinity of the subject site have been collected as part of this assessment by surveys undertaken by R.O.A.R. Data Pty Ltd on behalf of this firm from 6.30am – 9.30am and 3.00pm – 6.00pm on Thursday, 24 June 2021 (pre covid lock down) at the intersection of Hassall Street and Gregory Place. Conditions on this day were described as rainy with no unusual circumstances encountered.

A previous traffic survey and assessment from 2013 has revealed that There has been no traffic growth along Hassall Street in the 7 years between counts (1913 – 1921).

To assess the impact of the development on the intersection of Hassall Street and Gregory Place, the estimated morning and evening peak hour approach and departure vehicle trips have been assigned proportionally to this intersection on the basis of turning flows into and out of Gregory Place existing flows. Using SIDRA, the effect of the estimated traffic generation of the proposed development on the adjacent road system has been assessed.

The survey results reveal that the existing traffic flows along Gregory Place are below the RMS suggested Environmental Capacity and that the potential additional 92am and 72pm and peak hour traffic flows estimated for the proposed development will not cause this value to be exceeded. It should be noted that Environmental Capacity is not an indication of the number of vehicles that can travel along a roadway before congestion occurs but is the RMS's interpretation of when residents may raise concern over vehicle volumes.

6.9.4 Conclusions

The assessment undertaken by Traffic Solutions Pty Ltd, which will be further complemented in the future during more detailed design, has revealed the following:

- *The site is well served by public transport and will provide connections to the existing pedestrian and bicycle networks.*
- *The access driveways proposed to serve the development is suitably located and will provide good sight distance in both directions along Gregory Place.*
- *The estimated potential traffic generation increase of up to 92 vehicle movements in the peak hours will not cause the RMS suggested Environmental Capacity volume to be exceeded for Gregory Place and will not have a detrimental effect on the surrounding road network.*
- *The proposal has a potential net increase in estimated peak hour traffic flows in the order of 92 vehicle trips which will not have anu unacceptable traffic implications on the intersection of Hassall Street and Gregory place.*
- *At a concept level the proposal has resolved access arrangements by permitting all vehicles (excluding FRNSW) into the basement to access each building core on basement 1. This applies to visitors, delivery drivers, taxis and ambulance services. Provision for access for FNSW has been made to each building at ground level along the northern accessway.*
- *As a build to rent proposition the property owner and building management will promote alternative transportation through the finalisation and implementation of the attached drat green travel plan.*

6.9.5 Green Travel Plan

The proposal is accompanied by a green travel plan to minimise car dependency and encourage the increased the use of public transport and non-motorised modes of travel such as walking and cycling.

The Green Travel Plan seeks to reduce car dependency through the following actions:

1. By providing tenants with the available alternative transport options. All tenants will have access to comprehensive public transport, pedestrian and bicycle route information.
2. The Site is within close walking distance of bus stops. These stops have access to the 909 and M92 bus services.
3. The site is approximately 900m walk to Parramatta railway station and CBD and 800m to the Parramatta Ferry Wharf.
4. The following link is provided Trip Planner | transportnsw.info to facilitate the usage of these services.
5. The site is close proximity to the future approved Parramatta light rail which is proposed to operate along George Street to and from the proposed Parramatta metro station. There are 2 light rail stops in the vicinity, one is in Macquarie Street west of Harris Street (approximately 350m) and the second is in Tramway Avenue, west of Alfred Street (approximately 430m).

This Green Travel Plan shall be monitored and reviewed on a regular basis by the property owner or any onsite manager and made available to all new tenants. It is important to ensure the Green Travel Plan is meeting its objectives and having the intended impacts on car use and transport choice. The Plan is designed to be updated and changed to reflect changing circumstances.

Refer to the attached Green Travel Plan at Appendix W.

6.9.6 *Construction Traffic Management*

A conceptual Construction Traffic Management Plan has been prepared by Traffic Solutions Pty Ltd and is included at Appendix V.

This plan describes the proposed demolition, construction, traffic generation, vehicle approach/departure routes, impact upon the surrounding road network and address the following requirements issues:

i. Details of parking arrangements for all employees and contractors, including layover areas for large trucks during all stages of works.
ii. The proposed truck routes to and from the site including details of the frequency of truck movements for all stages of the development.
iii. The size of trucks for exportation of fill, concrete poor and deliveries.

It is noted that the site has existing driveways which will be utilised as part of the construction process and that the proposed truck and car traffic generation is unlikely to have a significant effect on the surrounding road system. No amelioration is proposed, having regard to the impacts and requirements for construction traffic outlined in the attached Plan.

6.10 Biodiversity

A request for a waiver for the requirement to prepare a Biodiversity Development Assessment Report (BDAR) was prepared by MJD Environmental and submitted to the DPE on 20 June 2022. The waiver was supported by Aboricultural Impact Assessment and Tree Management Plan, which identifies the trees within and adjoining the site and provides an individual health condition assessment, and their suitability for retention, preservation or removal. Refer to Appendix Y.

The waiver request was prepared having regard to Section 1.5 of the BC Act 2016 and Clause 1.4 of the Biodiversity Conservation Regulation 2017 and in accordance with the DPIE's *How to apply for a biodiversity development assessment report waiver*. The request for a BDAR waiver includes the information requirements set out in Tables 1 and 2 of the guideline.

The existence of biodiversity values and impact of the development on potential biodiversity value has been assessed through the preparation of the subject waiver request. Vegetation within the site is predominately in the form of exotic tree and shrub species. Vegetation exists along all margins of the site, along the canal and engulfing the disused cark parks. Additionally, non-endemic planted Eucalypts are present within the south-west, which will be retained in the form of a reserve. No remnant vegetation exists within the site, non-endemic planted vegetation is scattered amongst the prevalent non-native tree and shrub cover. Of interest, several mature planted Eucalyptus species are present within the north-east boundary, of which will all be retained.

The following, conclusions are drawn to demonstrate that the proposed future development of the site, facilitated by the subject concept application, is not likely to have any significant impact on biodiversity values:

- The proposal will not impact indigenous vegetation, vegetation communities or reduce important available habitat for threatened entities.
- The proposal will require the removal of twenty-one (21) non-endemic planted trees and shrubs, of which eleven (11) individuals require approval for under Part 5.4 of the DCP (2011). Of the 11 individuals,

five (5) are recommended for removal under Part 6 Division 4 Section 46 of the Sydney Water Act 1994 due to risks of infrastructure interference from root extents.

- The non-endemic planted species to be impacted as a result of the proposal do not constitute as habitat for threatened entities beyond opportunistic foraging.
- Owing to the sites position within the landscape, lack of indigenous vegetation and habitat features present within the site, impacts to threatened species or ecological communities or their habitat are unlikely to occur.
- Therefore, it is considered the application of a biodiversity assessment waiver as required under the SEARs issued for the site is appropriate for the current proposal due to the required removal of up to six (6) nonendemic planted trees.

Subsequently, a BDAR waiver was issued on 22 June 2022, confirming that "*the proposed development is not likely to have any significant impact on biodiversity values and therefore a Biodiversity Development Assessment Report is not required*". The waiver is included at Appendix Y.

6.11 Noise and Vibration

An Acoustic Assessment has been prepared by Renzo Tonin & Associates, in order to address the SEARs and demonstrate that the development could achieve compliance with the relevant NSW Environment Protection Authority (EPA) Guidelines. The Assessment is included at Appendix Z.

The relevant NSW EPA Guidelines relating to noise and vibration are as follows:

- Operational noise emissions from the site to be regulated by EPA Noise Policy for Industry and Road Noise Policy; and
- Construction noise to be regulated with reference to the EPA Interim Construction Noise Guidelines and Assessing Vibration: A Technical Guideline.

A detailed survey of ambient and background noise at the site was conducted using a combination of long term noise logging and attended noise measurements. The results of these measurements were used in conjunction with the EPA guidelines to set operational and construction noise limits.

Noise survey results and analysis at the site indicated that:

- The primary external noise sources at the site is road traffic from Hassall Street, which creates moderate noise levels (the apartments nearest Hassall Street are over 40m from the road).
- The Our Lady of Lebanon Church and associated car park did not cause significant levels of noise impact on the southern part of the site.

The primary operational noise associated with the site will be:

- Noise from plant and equipment. This is assessed with reference to the EPA Noise Policy for Industry. Primary plant and equipment items will consist of car park ventilation, air-conditioning plant and a sub-station. Compliance with noise emission goals will be achievable using standard acoustic treatment items (in-duct lining, acoustic louvres or similar) which would be determined at CC stage.
- Noise as a result of additional traffic created on Gregory Place. Gregory Place is a local road. Analysis of projected future traffic generation (and the noise associated with it) indicates that noise levels for residences located on Gregory Place will be compliant with the EPA Road Noise Policy.

With respect to construction noise:

- Given the proximity of the site to residential development to the east (Gregory Place) and south (Ruse Street), exceedance of EPA Noise Management Levels will potentially occur, particularly for noise intensive activities (bulk excavation) located close to the eastern or southern boundaries of the site. Exceedance of Noise Management Levels is common for construction projects in close proximity to residences.
- Given this, reasonable and feasible noise mitigation is likely to be required and would be identified in detail in a Construction Noise and Vibration Management Plan. This CNVMP would typically be prepared after development approval once a construction program is created

The assessment concludes that the proposed development is capable of complying with relevant EPA noise and vibration guidelines, as required by the SEARs.

6.12 Ground Water and Conditions

Alliance Geotechnical & environmental solutions have prepared a Geotechnical Investigation Report to assess the surface and sub-surface conditions at the site. The Investigation is included at Appendix AA.

Investigations were carried out on site between 19th November and 23rd November 2021. A second phase of investigations were carried out on 24th January 2022. The Investigations included:

- Five boreholes drilled to a maximum depth of 18.0m;
- Additional 4 boreholes drilled to a maximum depth of 7m in replacement of the Cone Penetration testing (CPT)
- Standard Penetration Tests (SPTs) at 1.5m depth intervals;
- Installation of three groundwater monitoring wells;

The following outlines the assessment and recommendations of the Investigation:

6.12.1 Excavation Conditions and Vibration

The site subsurface profile comprises uncontrolled fill (up to 1.5m thick) underlain by very soft to firm alluvium silty clay (up to 5.9m thick). Stiff to very stiff residual clay (up to 1.5m thick) is underlaying the alluvium clay stratum in some areas. The alluvial/residual soil is underlain extremely to highly weathered, very low strength shale (1.1 to 5.5m thick), which is underlain by fresh, medium to high strength shale at depths ranging between -6.4mRL and -0.8mRL (thickness not proven).

Excavations through the overlying soils, extremely low strength and very low strength shale (Class V and IV) are expected to be readily achievable using conventional earthworks equipment such as a tracked excavator with tiger toothed bucket. Excavations within low strength shale (Class III and better) may require larger excavators (i.e. >30 tonnes) and the use of ripping or rock impact breakers for bulk excavations. Low vibration equipment may be necessary near all site boundaries where vibrations could impact on adjacent building footings and structures.

Vibration monitoring may be required if excavation of medium and high strength shale bedrock is proposed to be undertaken within 10m of the site boundaries particularly along the eastern boundary. A dilapidation survey on nearby structures and infrastructure is recommended to be undertaken by a structural engineer prior to the commencement of any site excavations.

6.12.2 Excavation Stability

The proposed excavation can be undertaken by adopting unsupported batter slopes provided that the batter slopes in the soil does not extend below the 'zone of influence' of any adjacent structures and infrastructure (i.e. a 45° line in clay drawn from the foundation level of any adjacent structure and infrastructure).

very soft to firm clays have a maximum temporary dry batter slope angle of 3:1 (H:V). The batter slopes in very soft to firm clays will be very shallow and are unfeasible. Therefore unsupported batter slopes are not feasible and the excavation should be supported by a properly designed shoring system. Based on the available geotechnical data, it is recommended to install a shoring system along all excavation boundaries. The shoring system needs to be designed using WALLAP, PLAXIS or similar finite element analysis programs as soil structure interaction methods need to be used.

Referring to the bedrock cores obtained from the boreholes, the fractured zones and defects have been observed at different depths. Therefore, specific requirements set out above for excavation support and also the stability of the shale face should be assessed by an experienced geotechnical engineer as the excavation proceeds. Excavation depths should not exceed 1.5m lifts. It is recommended that the excavation be inspected by an experienced geotechnical engineer before proceeding further or applying any face treatment.

The anchoring system should be designed to provide temporary support with long-term lateral support being later transformed on to the permanent structure. The anchors should have a minimum free length of 4m or below a line 45 degrees from the base of excavation, whichever is the greater. Anchors will need to be installed progressively as the excavation proceeds.

A geotechnical monitoring program report should be prepared for this project to assess and confirm that the shoring wall deflections and movements are within tolerable limits accepted in design.

6.12.3 Groundwater Seepage Control

The flow rate into the proposed basement excavation assuming a basement area of 19,603m2 was calculated in accordance with Dupuit-Thiem equation for steady-state unconfined flow.

Based on industry practice and Water NSW requirements, the estimated expected unfactored inflow rate will be scrutinized by Water NSW and a dewatering management plan for submission to Water NSW along with a water license may be required. Further hydrogeological assessment and monitoring is required to derive a more accurate estimate for the groundwater inflows at a later stage.

It is anticipated that such seepage could be controlled and managed by using sump pumping techniques and that provision is to be allowed in design for an appropriately designed long term drainage system.

During the design life of the building, groundwater seepage should be controlled by a properly designed drainage system including a sub-floor drainage system to create a free-draining layer below the basement slab.

Also, adequate drainage should be provided for the retaining wall where it is proposed to install shotcrete. Therefore, the basement side walls, and base slab are not required to be designed for hydrostatic pressure.

6.12.4 *Impact of Adjoining Structures*

Consideration needs to be given to the following as part of the construction of the proposed development. Further assessment and analysis will occur during the detailed application process for development:

- **Utilities in the area**: An existing stormwater channel (Clay Cliff Channel) runs across the southern side of the site at roughly 2.5mRL and will be 6m away from the southern boundary of the proposed development. It needs to be ensured that the excavation and construction does not impact any existing utilities. A Specialist Engineering Assessment (SEA) report may need to be prepared to this effect.
- **Groundwater drawdown**: groundwater table drawdown due to dewatering of the excavation can lead to movement in the adjoining buildings. Further groundwater investigations along with a hydrogeological assessment and monitoring is required to understand the drawdown effects accurately.

6.12.5 *Acid Sulfate Soils*

Based on the desktop review data, fieldwork observations, and the laboratory analytical results, the Investigation Report concludes that:

- The sulfur trail and acid trail analytical results for one of the five soil samples analysed, triggered the adopted action criteria (0.03 %S oxidisable and 18 mol H+ / tonne).
- The liming rate required for remediation of the AASS and PASS across the site is currently 1.4kg CaCO3 / tonne; and
- The identified potential Acid Sulfate Soils (ASS) at the site is likely to be disturbed by the construction phase of the proposed works.

Based on these conclusions, and in accordance with ASSMAC (1998), Alliance recommends the following:

- Undertake a supplementary acid sulfate soils assessment within areas of the site that were inaccessible at the time of this assessment, following demolition of site structures and gained access to site soils.
- Development of an acid sulfate soils management plan for the site to:
- document the procedures and standards to be followed to manage the risks posed by PASS during ground disturbance works at the site association with proposed construction;
- Outline the management measures to be implemented to minimise the potential for adverse environmental impacts resulting from the disturbance of ASS; and
- Manage the offsite disposal of excavated materials aligned to the NSW EPA Waste Classification Guidelines Part 1: Classifying Waste (NSW EPA, 2014a) and Waste Classification Guidelines Part 4: Acid Sulfate Soils (NSW EPA, 2014b).

6.13 Stormwater and Wastewater

An Integrated Water Management Plan has been prepared by Kozarovski and Partners in accordance the SEARs related to stormwater and wastewater. The Plan is included at Appendix CC.

Parramatta council's Stormwater Disposal Policy requires an On-Site Detention. The site is located at the bottom of a large catchment and the effectiveness of the OSD was assessed by hydrological modelling. The results of the hydrological modelling indicate that the provision of the OSD would result in an increase in the peak discharge values downstream of the site from 46 m3/s for existing conditions to 46.3 m3/s with the

proposed development with an OSD. The peak discharge values for proposed conditions would remain the same as for existing conditions.

An OSD, in this particular case, would have a negative impact on flooding downstream of the site and therefore has not been applied.

6.13.1 Waters Sensitive Urban Design

A stormwater management strategy based on collection and re-use of the roof and surface water has been developed instead of an OSD system. The aim of this water sensitive urban design strategy is to intercept the runoff from the site and re-use it for irrigation and toilet flushing. The layout of the proposed stormwater drainage system is shown in the attached Plan at Figure 4.

A system of pits, grates and pipes are proposed to intercept the surface runoff and collect it into a 58m3 First Flush Tank (FFT). The FFT would be emptied via 8 "Ocean Protect" Stormfilters before discharging to the Creek. The overflow from the FFT would be directed to a 310 m3 Stormwater Tank. The water from the Stormwater tank would be used for irrigation of some 5500 sq.m of landscaped area. The stormwater tank would supply 89% of the irrigation demand. Further, a rainwater tank providing water for toilet flushing would satisfy 80% of the demand.

The proposed WSUD strategy was simulated using MUSIC model in accordance with Council's guidelines to ensure council's s pollutants' reduction targets defined in the DCP can be met. The MUSIC results demonstrate that the proposed water cycle management strategy would meet the council's pollutants' reduction targets.

6.13.2 Council Consultation

Consultation was sought with council at the start of June 2022 to enable a review of the OSD and WSUD parameters. A formal position has yet to be established, however given the application is currently at concept stage and does not seek consent for development, there will be further opportunities to discuss the proposed approach with council as the detailed design progresses. It is also note that the proposed development does not necessitate the incorporation of drainage infrastructure works required to be handed over to the local council or other authority.

6.14 Flooding Risk

The site is affected by flooding due to its proximity to Clay Cliff Creek. Accordingly, a flood study has been prepared by GRC Hydro, which seeks to determine the relevant flood levels, the flood hazard and the flood behaviour in a range of flood events, and a Flood Risk Management Report prepared by Kozarovski and Partners, which seeks to assess the impacts of the development and detail design solutions and operational procedures to mitigate flood risk. The reports are included at Appendix CC and DD.

6.14.1 Existing Environment

The subject site is located within the Clay Cliff Creek catchment. The catchment at the site is 285 hectares. Clay Cliff Creek meets Parramatta River 1.2 km downstream of the site. The creek passes through the site, generally adjacent to the site's southern boundary, and consists of a concrete engineered channel. Ground elevations of the site range from approximately 2.3 to 5.5 m AHD.

Council has issued a flood certificate for the site. In the certificate, the mapping shows a large portion of the site is affected in the 5% AEP flood event, with the remainder within the 1% AEP flood extent. Around half of the site adjacent to the creek is identified as having 1% AEP high hazard flooding.

6.14.2 Hydrological Modelling

A WBNM model was developed by GRC Hydro to generate catchment flows from applied rainfall using the methodologies outlined in the Australian Rainfall and Runoff guide for flood estimation (ARR2019). A TUFLOW 2D numerical hydraulic package was also developed to convert applied flows from the hydrology model to derive flood depths, levels, and velocities.

The modelling found that the subject site is inundated by the 1% AEP Flood with low hydraulic hazard. Flooding at the site occurs when the Clay Cliff Creek channel capacity is exceeded and water spreads laterally from channel. In large flood events flow can spread across the site with shallow flow on the north side of the site's building.

The peak flow in Clay Cliff Creek adjacent to the property is 20.3 m3/s in the 5% AEP event and 28.8 m3 /s in the 1% AEP event. 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 flooding over a significant portion of the site, particularly in the north-west corner, where depths of around 0.1-0.4 m occur in the area west of the building. The extent of the 5% AEP and 1% AEP Floods are shown in the below figures.

Based on the hazard at the site, areas of the site outside of the channel would be classified as Medium Risk Areas in Council's DCP, as they are flooded in the 1% AEP with medium and low hazard flooding. The channel itself is a High Risk Area. Small portions of the site are not flooded in a 1% AEP, and would be Low Risk Areas.

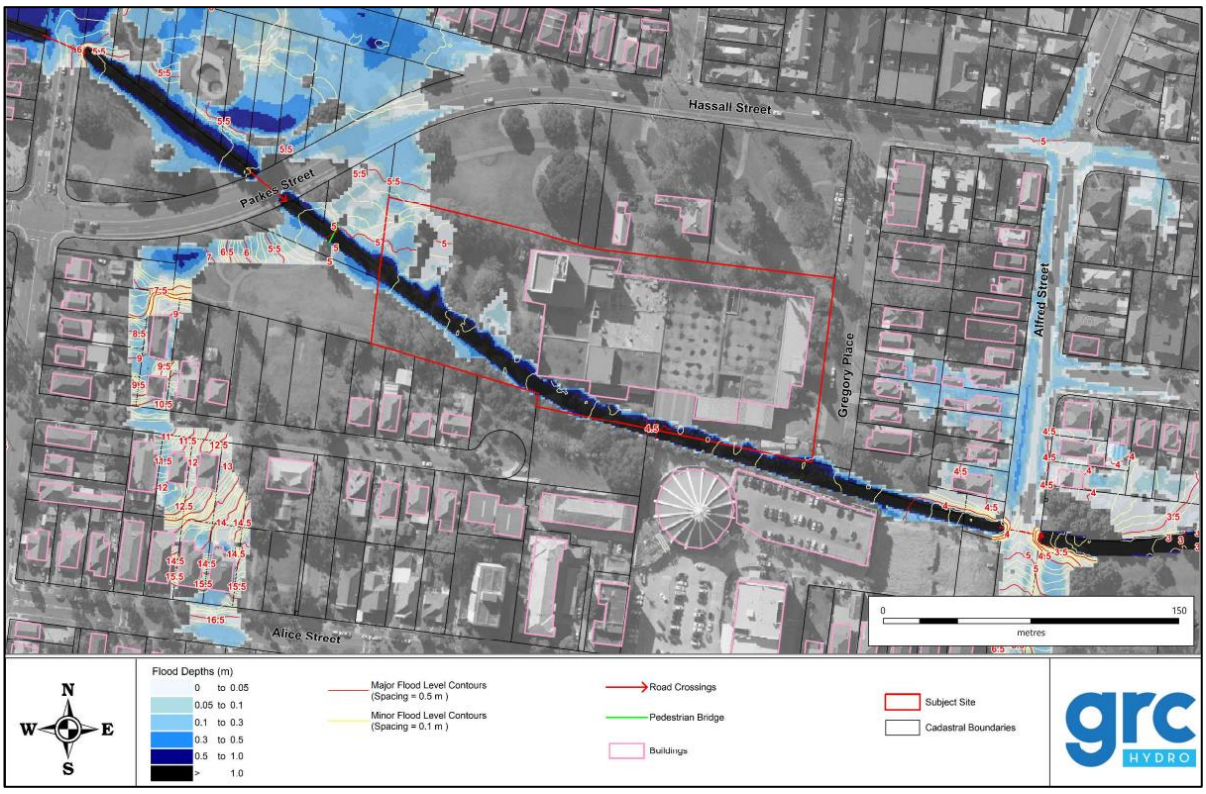


Figure 43: 5% AEP Peak Depth and Level – Existing Conditions (*source: GRC Hydro*)

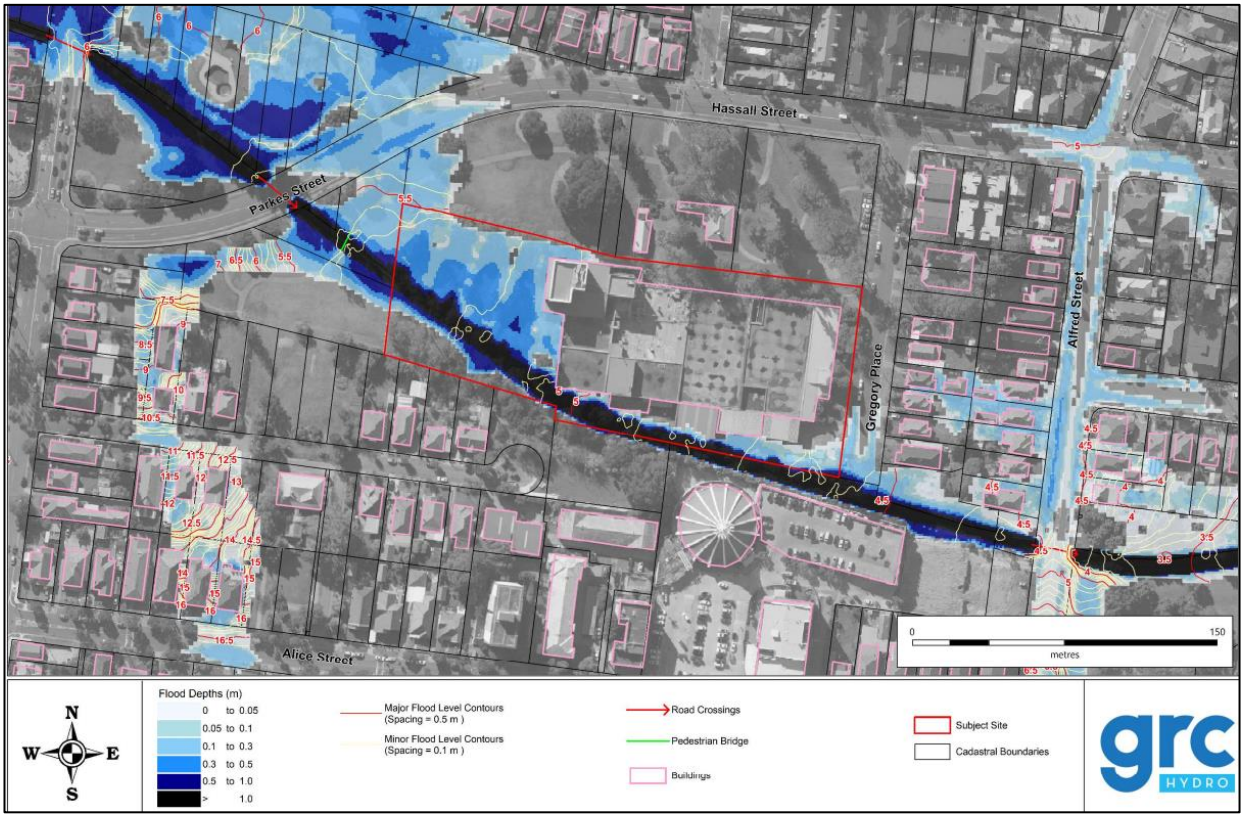


Figure 44: 1% AEP Peak Depth and Level – Existing Conditions (*source: GRC Hydro*)

6.14.3 Development Flood Impact and Mitigation

The initial modelling of the proposed development indicated some impact upstream and downstream of the site mostly due to the lost flood storage and conveyance being inhibited at the northwest of site. Impacts appear to be mainly on public land in upstream and downstream. Overall, the flood impact assessment shows a slight increase in flood levels in some areas but no impact on private property and no significant increase in flood risk.

Compensatory flood storage has therefore been introduced to minimise flooding impacts. It is proposed to provide an additional flood storage in the area of building C between the roof of the proposed carpark and the suspended slab of the building. The introduction of the compensatory flood storage at the western end of the site results a negligible impact on the flood behaviour. Refer to figure below regarding location of compensatory flood storage location.

As part of the construction methodology, the proposed buildings must be constructed from flood compatible material up to the PMF level or RL 9.3 m AHD or higher. Concrete, bricks, cement render and hardwood can be considered as flood compatible materials.

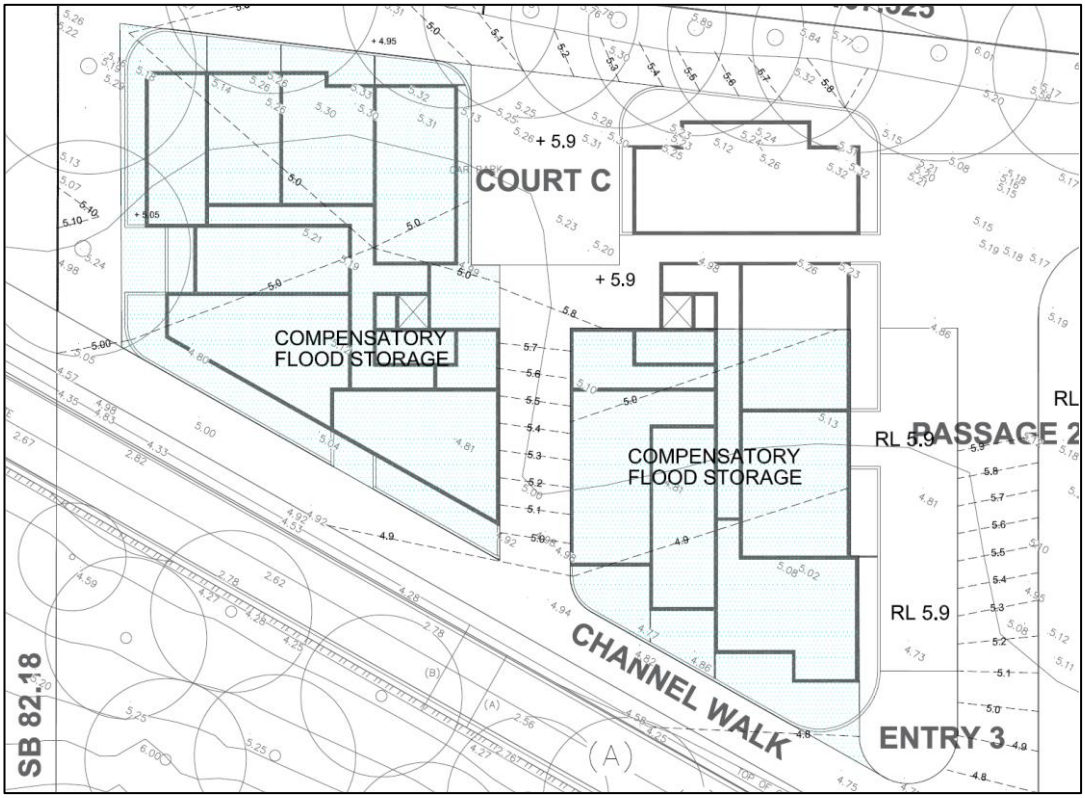


Figure 45: Location of compensatory flood storage (*source: Kozarovski and Partners*)

6.14.4 Flood Emergency Response

The Flood Risk Management Report incorporates emergency response measures in the case of a flood scenario.

Evacuation to higher areas from the site would be risky during the PMF event because people would have to wade through a deep water. Evacuation from the site is not recommended. The residents from the ground floor would have to evacuate to first or second floor within the buildings during the extreme floods such as the PMF. A flood emergency response plan is included in the attached Flood Risk Management Report.

Further, residents should not use the basements during extreme flood such as PMF. The basement areas should be protected from the 1% AEP flood, however these can get inundated during larger floods. A flood warning system should be installed to warn the residents not to use the basements in a case of a very large flood. The inundated street in front of the site should be used as a trigger to instigate the flood emergency response plan.

6.15 Contamination and Remediation

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.

Notwithstanding the requirement in the SEARs that a Preliminary Site Investigation be undertaken given the application is only seeks concept approval, a detailed Phase 2 Contamination Investigation and Remediation Action Plan (RAP), have been prepared by Sullivan Environmental Sciences to *"demonstrate the site is suitable (or will be suitable, after remediation) for the development".* The reports are included at Appendix EE.

The purpose of the Phase 2 Investigation was to investigate for the presence of soil and groundwater contamination, to assess potential health risks for future use of the land under a residential apartment setting, and provide recommendations for additional investigations or remediation, if required.

The report makes a number of recommendations, and importantly concludes:

> *"Sullivan-ES conclude that the site can be made suitable for the proposed high density residential use subject to closing out data gaps, decommissioning of (Underground Storage Tanks) USTs and the (Effluent Treatment Plant) ETP onsite and performing remediation works in localised areas of the site to remove any unacceptable health risks".*
>
> *We recommend that a Remedial Action Plan (RAP) is prepared. The RAP should be prepared or reviewed and approved by a Certified Environmental Practitioner specialising in Site Contamination (CEnvP-SC) as certified by one of the two schemes recognised by the NSW Environment Protection Authority. T*

As mentioned above, a RAP has been prepared to provide a plan detailing the remedial work activities including delineating contamination, removal, validation, WH&S and environment management strategies associated with the remediation of localised impacted soil material at the site. The RAP has been prepared in accordance with relevant NSW EPA guidance documentation and industry standards, with sufficient detail to implement the preferred remedial strategy.

The steps in remediating the site include:

- Decommission redundant UST and any remnant underground fuel dispensing infrastructure and remove from the site;
- Decommission the redundant ETP including liquids and associated infrastructure and remove from site; and,
- Delineation and excavation of impacted soil materials and transported to a licenced landfill for waste disposal.

The proposed remediation strategy is considered appropriate for soil contamination onsite and is both technically feasible and practical to implement under the known site conditions.

Subject to the successful implementation of the remediation and validation measures detailed in the attached RAP, Sullivan Environmental Sciences considers the site can be rendered suitable for its intended future land use for residential apartment development with associated basement carparking and open space.

6.16 Waste Management

A Waste Management Plan has been prepared for the demolition/construction phase of the project and the operational stage of the project, noting that the concept application does not seek consent for development or construction at this stage. The Plan is included at Appendix HH.

6.16.1 Demolition and Construction

In terms of demolition and construction, the Plan identifies a number of waste management principles to be adopted and guide the demolition and construction process, including waste avoidance, reuse, recycle and disposal. It is noted that the demolition stage has the greatest potential for waste minimisation and re-use while opportunities exist during the construction phase to save resources and minimise waste.

The Plan provides simple techniques to estimate e volumes of construction and demolition waste. These volumes, produced by excavation, demolition and construction stages shall be estimated by the contractor at the construction certificate stage. The arrangements for all reused, recycled and disposed waste shall be tracked and recorded, and all receipts shall be held on-site.

The waste collection service for the proposed demolition and construction stage of the development will be provided by a private waste contractor. All vehicle movements and strategic placement of the bins on site, ensuring the bins are relocated when needed during the works to maintain safe access and use at all times, will be provided by the site manager.

6.16.2 Operational Waste

The waste collection area is to be located in a waste storage room on basement level 2, with the on-site waste collection service for the proposed development will be provided by a private contractor. Waste generation rates of 80L/per/week for general landfill waste and 40L/per/week for commingled recycling waste have been adopted based on weekly rates within the Parramatta DCP & NSW Policy for Waste Minimisation in New Developments.

Using these rates, it is noted that the following garbage and recycling requirements can be calculated based on the staging of the development:

Building A (Stage 1)

- 211 x Units x 80L of general waste per week = 16,880L (uncompacted)
- 211 x Units x 40L of recycling waste per week = 8,440L (uncompacted)

Building B (Stage 2)

- 163 x Units x 80L of general waste per week = 13,040L (uncompacted)
- 163 x Units x 40L of recycling waste per week = 6,520L (uncompacted)

Building C (Stage 3)

- 109 x Units x 80L of general waste per week = 8,720L (uncompacted)
- 109 x Units x 40L of recycling waste per week = 4,360L (uncompacted)

Total Waste: General Waste = 38,640L & Recycling Waste = 19,320L

Each basement endpoint chute room will have the capacity for 2 days of 1,100L general waste MGB's. The 360L MGB's will be used to swap over with the smaller waste rooms on each floor.

Building A - Each Basement Level 2 Waste Chute Room (2)

- 2 x 1,100L General Waste MGB's – exchanged every 2 days using the bin tug.

Building B - Each Basement Level 2 Waste Chute Room (2)

- 1 x 1,100L General Waste MGB's – exchanged every 2 days using the bin tug.

Building C - Each Basement Level 2 Waste Chute Room (2)

- 1 x 1,100L General Waste MGB's – exchanged every 2 days using the bin tug.

Central Basement Level 2 Waste Storage/Collection Room (1)

- 36 x 1,100L General Waste MGB's – collected and emptied once a week.
- 54 x 360L Recycling Waste MGB's – collected and emptied once a week.

The waste collection vehicle will enter the building basement via Gregory Place and parking on the HRV turntable on basement level 2 near the waste storage area. Wheel the MGB's to/from the waste vehicle emptying the MGB's. Once all the MGB's have been emptied and returned to waste collection room the waste vehicle will leave in a forward motion.

The following figure illustrates a scaled diagram of the MGB's within the waste storage area.

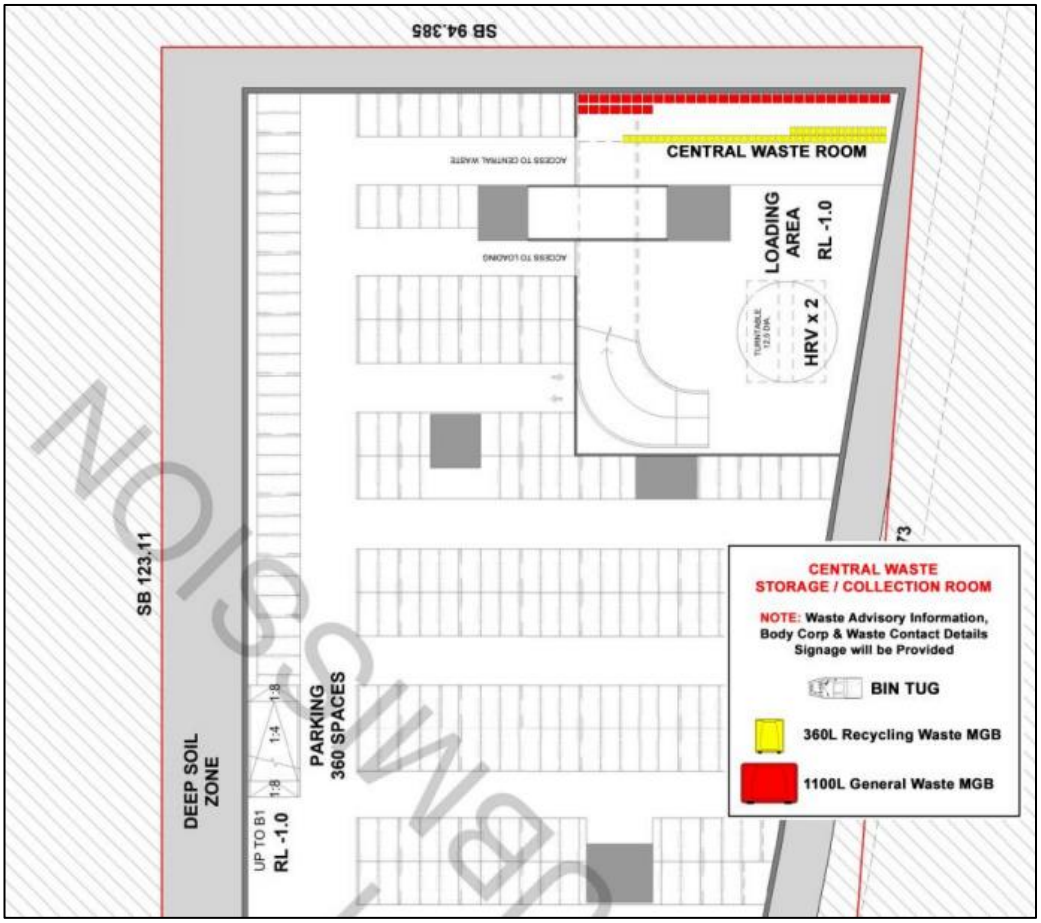


Figure 46: Indicative waste storage arrangement (source: AusWide)

6.17 Aboriginal Cultural Heritage

An Aboriginal Cultural Heritage Assessment Report has been prepared by Dominic Steele Consulting Archaeology and is included at Appendix II. The preparation of the report has been guided by current State Aboriginal cultural heritage assessment guidelines and has followed the consultation and heritage values assessment methods required by the Aboriginal Consultation Requirements for Proponents (DECCW 2010).

The assessment notes that there are no recorded Aboriginal objects or archaeological sites on the 2A Gregory Place property or immediately nearby, but the site is located on the southern edge of the State Heritage Register listed and mapped Parramatta Sand Body that has the potential to contain significant Aboriginal and early colonial archaeological records and is State heritage listed for its combined archaeological, historical and environmental values.

The SEARs that have been issued for the proposal include a requirement to provide an Aboriginal Cultural Heritage Assessment Report (ACHAR) in accordance with relevant guidelines that identifies, describes and assesses any impacts for Aboriginal cultural heritage values on the site. This ACHAR for the 2A Gregory Place property has been prepared in accordance with the Aboriginal Cultural Heritage Consultation Requirements for Proponents (DECCW 2010) and has been developed in consultation with Aboriginal community groups and individuals to identify and understand the Aboriginal cultural heritage values of the land.

6.17.1 Potential Aboriginal archaeological resources

Geotechnical bore-logs show the site subsurface profile below the existing concrete and asphalt ground surfaces across the former 1950s factory consists of up to 1.5 metres thick deposits of uncontrolled fill underlain by very soft to firm alluvium silty clay which is up to 5.9 metres thick. This alluvial sedimentary profile may contain Aboriginal objects and archaeological deposit with cultural and scientific value, but the upper parts of the sequence has been widely and in parts deeply disturbed. Stiff residual clay underlies the alluvium in some areas. The alluvial/residual soil is underlain by shale.

6.17.2 Evaluation of land use impacts on potential archaeological resources

The 2A Gregory Place is located on the edge of the Parramatta Sand Body (PSB) and within a potentially sensitive archaeological landform context on Clay Cliff Creek. The construction of the stormwater channel followed by the factory resulted in significant modification of the original drainage of Clay Cliff Creek and lowering of the ground to significant depths below current levels present in the adjacent grounds of Hambledon cottage (up to 2 metres below the levels of the surrounding ground surfaces, and much deeper below the main building of the former factory).

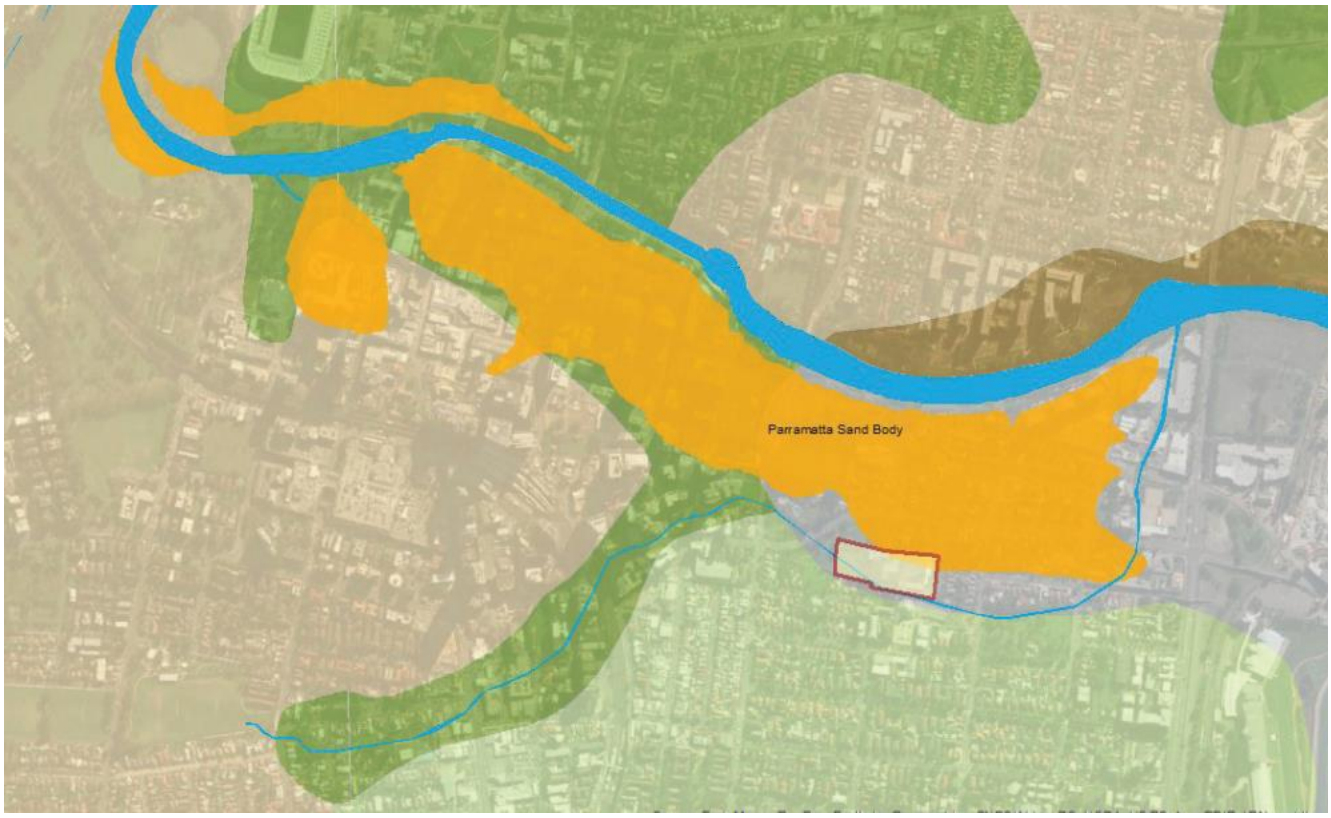


Figure 47: Approximate distribution of Parramatta Sand Body (*Mitchell 2006*)

There is a possibility soils and sediments that occur below levels of historical disturbance may contain Aboriginal objects. However, the land use history for the site (agriculture for 150 years followed by industrial building construction), and for the modification of the original chain of ponds drainage into a stormwater canal combined with the topographically low-lying landscape context of the site, suggests that the potential subsurface archaeological profile has been widely disturbed and to considerable depths in many places.

Preliminary contamination investigations at the site show that historic activities related to the factory may have caused potential contamination that may pose a potential health risk to future human and environmental receptors and further investigation is to be undertaken to assess if the identified issues have caused impacts to soils and groundwater. The findings from future contamination assessment and recommended management actions will direct where and how future Aboriginal archaeological test excavation may occur at the site.

6.17.3 Management Recommendations

These recommendations have been developed through consultation with Aboriginal community groups and individuals as part of this Aboriginal cultural heritage assessment for the site that concludes the subsurface soil profiles at the site have the potential to contain Aboriginal objects and further investigation and assessment is required.

- The Proponent invite the Project RAP's to assist in the development of an archaeological research design and test excavation methodology for the site based on the results of future contamination assessment and consideration of demolition planning.

- The Proponent will use the test excavation methodology developed with the community and this ACHAR to support an application to HNSW for approval to test excavate the site to establish whether an Aboriginal Heritage Impact Permit (AHIP) is required under the National Parks and Wildlife Act 1974 (NPW Act) for the proposal if it is determined that Aboriginal objects are present and likely harmed by the redevelopment.

6.18 Environmental Heritage

A Statement of Heritage Impact has been prepared by GBA Heritage (Appendix KK), and a Historical Archaeological Heritage Impact Assessment has been prepared by Dominic Steele Consulting Archaeology (Appendix JJ), in response to the SEARs related to Environmental Heritage. This includes the preparation of a Statement of Heritage Impact in accordance with the guidelines in the NSW Heritage Manual and an Archaeological assessment prepared in accordance with the relevant guidelines, which assesses any impacts and outlines measures to ensure they are minimised and mitigated.

6.18.1 European Heritage

The subject site 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. Extensive and multi-disciplinary research was undertaken, by GBA Heritage and the project team, into the evolution of the historic cultural landscape from early human habitation, colonial era settlement, and the contemporary multi-cultural character of Harris Park.

The Statement of Heritage Impact attached at Appendix KK, includes a very detailed description of the historical landscape and evolution of historical uses which won't be replicated here.

The existing and now redundant former pharmaceuticals assembly light industrial complex located on the site, is located within one of the most significant and sensitive historical cultural landscapes in the Parramatta locality. Although not individually heritage listed by either State or Local authorities, the site is located to the immediate south of the State heritage listed Hambledon Cottage, and its historic landscaped setting. It is also in the vicinity of the State listed Elizabeth Farm and Experiment Farm properties and is set to the north of an expansive LEP listed Experiment Farm Heritage Conservation Area. It is also in the vicinity of LEP listed Elizabeth Farm and Harris Park West Conservation Areas.

<u>State significance:</u>

I00001 - Elizabeth Farm House
I00285 - 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).

<u>Local significance:</u>

I532 - Timber cottages
I254 - Boundary Stone

<u>Conservation areas:</u>

Elizabeth Farm Conservation Area
Experiment Farm Conservation Area
Harris Park West Conservation Area

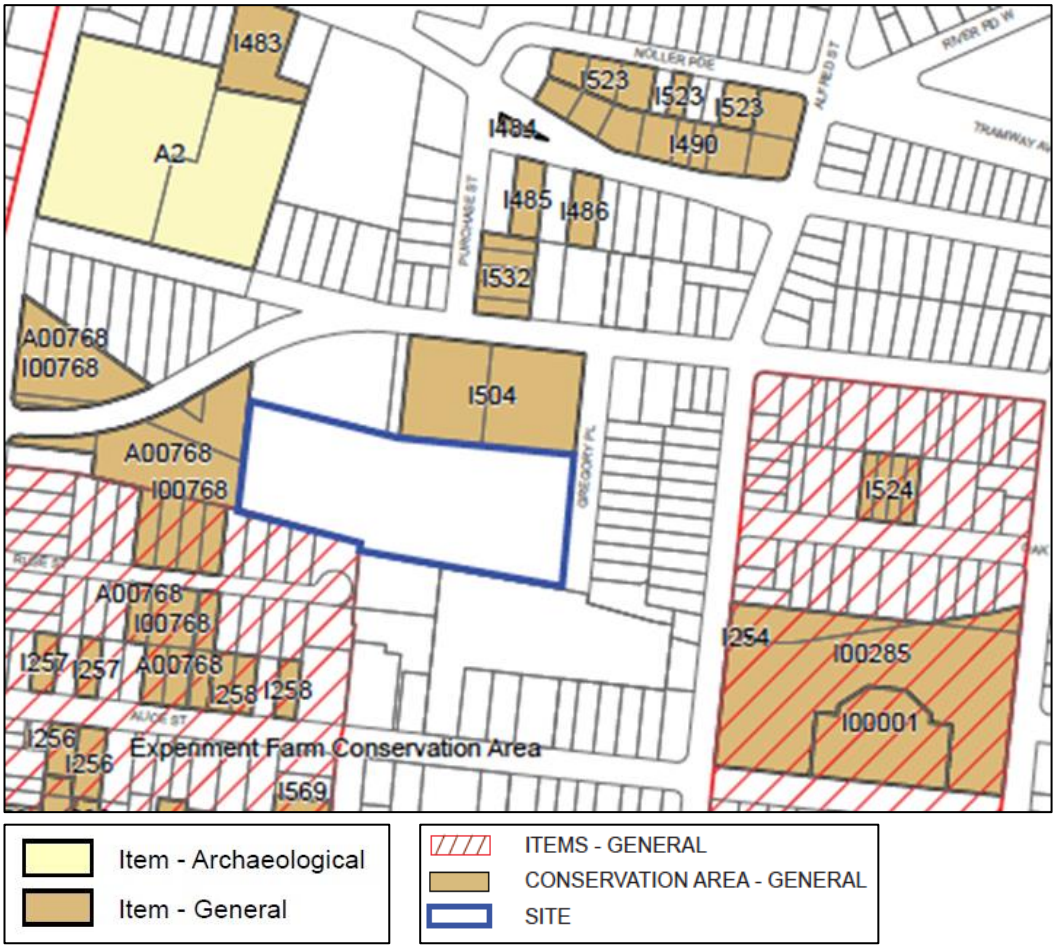


Figure 48: Parramatta LEP 2011 Heritage Map

The agreed development pathway commenced with the issue of a SCC as the framework for testing the capacity of the site for residential development. In July 2017, the department approved a SCC under then Clause 37(1) of SEPP Affordable Rental Housing 2009 (ARHSEPP). The SCC included:

> *"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 applications process"*

Subsequently, in 2018, an initial concept plan presented to the NSW Heritage Council comprised perimeter forms and point towers in an orthogonal arrangement.

Following the consultation with City of Parramatta Council's Heritage Officer and NBRS + Partners (heritage consultant during the SCC process) that established a new design parameter to protect view corridors between three SHR listed items, an initial concept plan was based on a 'triangular' layout with a built edge that defined a potential through site link at the southern boundary of the subject site. As it transpired, this principal design guidance resulted in an awkward splayed planning layout, poorly configured building footprints and new buildings located very close to the common site boundary with Hambledon Cottage. Furthermore, a scheme with lower heights needed to be explored.

As part of the discussions with the HCAC during 2020, it became apparent that the location and setting of the subject site was set within a complex and evolved cultural and natural landscape, and in the vicinity of places of considerable State Heritage significance.

In mid-2020 the NSW Heritage Council commissioned LSJ Heritage Consultants to prepare a review of the various Conservation Management Plans (CMPs) that had been prepared for the three State items (Elizabeth Farm, Experiment Farm and Hambledon Cottage) and prepare a commentary on the evolving cultural landscape created by the Harris and Macarthur Estates that forms the immediate context for the subject site. The aim of the study was to provide *a synthesis of previous research undertaken in relation to the history and significance of each of the three identified properties and the interconnections between each property, both historically and currently*.

Simultaneously, GBA Heritage were commissioned by the proponent to carry out background research into the interaction between the natural landscape of the locality and the evolving land ownership and land use across the somewhat wider context of the early settlement of Parramatta township. This research ultimately tracked the subdivision of the Macarthur Elizabeth Farm estate in the 1880s through to the formation of the subject site and its physical relationship with the adjoining Hambledon Cottage property. Detailed historical research of the subject site formed a basis for the proposed concept plan.

Stanisic Architects, the architectural design team, were nominated as the design architect to develop the concept application with the oversight of the appointed Design Integrity Panel to ensure the preservation of design excellence. This includes review of the brief and proposed uses within the buildings and site, site analysis, place making and principles, design criteria, design concept, estimated project budget and construction costs.

Extensive working sessions with HCAC, council, and peer review process from 2018 to 2021, resulted in substantial changes to the initial concept. The NSW Heritage Council did not see importance of maintaining view corridors and vistas that did not exist in reality between three State listed items. The preference was given to the site layout, based on an orthogonal layout of the overall subdivision and street patterns that currently define the contemporary cultural landscape of Harris Park. As such, the current scheme has been arranged into an orthogonal layout of five fingers varying in height from 4-8 storeys, responding to the evolving cultural landscape and being consistent with the scale of development in the locality.

The attached SoHI report concludes that the proposed development has an acceptable heritage impact on the heritage significance and values of the SHR listed items in the vicinity of the subject site, and thus the consent authority should have no hesitation, from a heritage perspective in approving the application.

Further, and following numerous presentations and workshops with the, HCAC, discussed above, it is noted that the NSW Heritage Council concluded in its minutes of 2 March 2021, that it "*supports progression of the scheme to Stage 1 Development Application*". The advancement of the concept, therefore, is in accordance with the NSW Heritage Council's advice.

6.18.2 Archaeological Heritage

A (non-Aboriginal) historical archaeological heritage impact assessment (Appendix JJ) has been prepared by Dominic Steele Consulting Archaeology and identifies whether the proposed redevelopment may potentially result in impacts to archaeological relics as defined by the relics provisions of the Heritage Act 1977 and recommends if potential archaeological impacts are identified, how future impacts can be mitigated and managed.

The subject property comprises a consolidation of land subdivided from two early 1790s historical land grants (Experiment farm and Elizabeth Farm). This land may have been used for growing crops and for animal grazing, and as a water source and possibly for clay materials extracted for brick-making sourced from Clay Cliff Creek during the early nineteenth century. However, the land was not built upon until about 1854 when a brick cottage was constructed ('Neale's cottage') on the south side of Hambledon cottage. The dwelling may have been located within the site footprint and was demolished sometime before 1943, and possibly around 1917 when the section of the Clay Cliff Creek stormwater drain that crosses the site is believed to have been constructed.

The construction of the stormwater channel followed by the factory resulted in significant modification of the original drainage and lowering of the ground to significant depths below current levels present in the adjacent grounds of Hambledon cottage. The depth of subsurface impact from building can be established by geotechnical information that show original ground levels have been cut-down by over two metres or more in places. On this basis, it is not expected that significant and intact historical archaeological features and deposits are present at the site and it is evaluated that the potential historical archaeological sensitivity of the 2A Gregory Place site is low.

The archaeological assessment makes management recommendations as follows:

- The site is assessed unlikely to contain or preserve relics as they are defined and protected by the provisions of the Heritage Act 1977, and there are no significant historical archaeological constraints to the proposed development .at 2A Gregory Place from proceeding (with caution) as planned.

- Should any historical archaeological materials be unexpectedly discovered that are suspected to be relics in any area of the site during future works, then all excavation or disturbance to the area is to stop immediately and the Heritage Council of NSW should be informed in accordance with Section 146 of the Heritage Act 1977.

6.19 Social Impact

A Social Impact Assessment (SIA) has been prepared by Forward Thinking and is included at Appendix LL. The SIA has been prepared in accordance with the methodology and requirements for an SIA outlined in *Social Impact Assessment Guideline for State Significant Projects* July 2021 (SIA Guidelines). It takes into account a scoping discussion with the Department of Planning and Environment Social Impact Assessment team and council's social planner, as well as good practice social planning methods.

This SIA has been prepared by Professor Roberta Ryan and Lucinda Molloy of Forward Thinking. They are appropriately qualified and experienced to prepare the SIA and have included a signed declaration in the attached SIA. Consideration of the social benefits of the project is particularly relevant given the project is for a build-to-rent scheme supporting 483 apartments, of which 50% are to be affordable housing dwellings.

This SIA provides a background to the proposal, uses a strong evidence base to analyse potential impacts on the social environment using the SIA Guideline assessment framework, and suggests mitigation measures to alleviate some of the consequences of the development.

The proposal presents some significant positive benefits of a high magnitude and likelihood. Key positive benefits include the provision of affordable rental housing and housing for long term renters, located in a

highly accessible location close to health, education and employment services where there is demonstrated demand. The groups likely to benefit from this are long term renters who would become the future residents of the site, and those experiencing housing stress who are eligible for affordable rental housing under the Housing SEPP.

Other positive benefits that would be realised from the concept plan would be the allocation of significant amounts of open space on the site, most of which will be publicly accessible. Whilst the details around the type and quality of open space and place making opportunities can be determined in the more detailed design phases, the proposal seeks approval for opportunities to enhance Aboriginal values, customs and beliefs associated with the site and local area, as well as revitalising landforms and waterways on the site including the Clay Cliff Creek Walk. The beneficiaries of these impacts would be those in the immediate social locality and those visiting or living in the surrounding centres of Harris Park and Rosehill.

Impacts associated with intensifying the use of the site, including upwards of 450 residents, are likely to be felt by immediate surrounding neighbours including residences along Gregory Place, Hambledon Cottage and OLOL. These impacts include disturbance during construction phases of the project, visual impacts due to intensification of the building footprints on the site, and changes to traffic flows in and around the site due to increase in volume of cars entering the site once it is operational. Long term impacts tend to be positive and include meeting a demand for new and affordable housing in Parramatta LGA, including the provision of 450+ new dwellings including 50% affordable, access to new open space, access to place making opportunities and generally opening the site and reconnecting it with the surrounding area.

Some impacts cannot reasonably be defined at the concept application stage (such as visual impacts associated with changes to the site that are dependent on building materials and finishes, the useability features of the open space (such as benches, walkway design etc) and specific details on the provision of communal facilities and apartment features on the site. Whilst these impacts will be defined through later stages on the project including detailed design, they have still been considered and tabled in the SIA (Section 7).

Essentially, the SIA concludes that there are a range of social impacts that are likely to be generated by the concept DA should it be approved. These vary in likelihood, magnitude and dimension, some of which cannot be reasonably defined at this stage in the planning process. There are also impacts that could possibly arise during the operational phases of the project and will be dependent on the long-term management of the site (such as tenant and asset management, site maintenance etc).

The long-term benefits of the proposal are associated with the wider community benefit of providing 450+ units that will contribute to broader local and state government strategic priorities for housing diversity, accessibility and affordability in close proximity to essential services and job opportunities. There will also be benefits for the immediate and intermediate social locality through the renewal of a significant site in a highly valued heritage area, opening the currently underutilised site up, and reconnecting it to the surrounding areas of Harris Park and Parramatta CBD. The provision of publicly accessible open space across over half of the site, place making opportunities celebrating Indigenous and non-Indigenous history, and the enhancement of the natural and historical features of the site such as the Clay Cliff Creek walk will also provide public benefit to the current community and visitors to the precinct.

In the short term, the redevelopment of the site will have some impacts on the immediate social locality. There will be impacts associated with the construction period, and some impacts on the traffic flows through Gregory Place and surrounding streets. The way immediate neighbours experience the site will also change, including visual impacts associated with the increased building density on the site, generally more foot and vehicle

traffic, and changes to the appearance and functioning of the site interface with the Hambledon Cottage grounds.

The assessment concludes that perceived and or actual negative impacts of the concept development application can be successfully managed with the implementation of mitigation measures designed to reduce negative impacts from being realised in the detailed design phase and ultimately the operational phase of the project should it be approved. The Concept Plan DA has the potential to deliver significant overall benefit to the socio-economic environment of the local area and Parramatta region more broadly.

6.20 Infrastructure Requirements and Utilities

An Infrastructure Delivery, Management and Staging Plan has been prepared by Hallmark Construction Pty Ltd and is included at Appendix MM. The Plan has been prepared to assess the impacts of the development on existing utility providers and infrastructure within the site's proximity and identify any potential upgrades to existing on-site and off-site infrastructure services.

The following identifies the assets considered to be affected by the project:

- Electricity
- Gas
- Communication
- Water
- Transportation

6.20.1 Power Infrastructure

The electrical infrastructure assets surrounding the site form part of the local Endeavour Energy distribution network for the local area and mainly consists of HV/LV feeders that supply power to the site as well as the local neighbourhood. The existing site is supplied through the existing onsite kiosk substation located along the northern boundary of the site, accessed through the north-eastern driveway off Gregory Place.

The proposal is currently a concept proposal, with the detailed design proceeding in the subsequent stages. It is recommended that with the commencement of the detailed design of the first stage, the relevant information is sought from Endeavour Energy in respect to the extent that the existing substation supplies neighbouring properties.

Based on the current drawings, it appears that the existing substation is located outside the proposed basement. IN order to maintain supply to the existing customers, the new chamber substation proposed is required to be established and existing customers cut over prior to demolition and removal of the existing substation.

The proposed concept has identified a location for a chamber substation. The final size of the substation will be finalised with the detailed design and the power demand of the relevant systems (vertical transportation, air conditioning, ventilation, cooking, etc). Based on similar projects, it is anticipated that the maximum demand will require a triple transformer substation. The new chamber substation will be delivered with the first stage of the project, and prior to the decommissioning of the existing substation. All costs associated with these works will be borne by the project.

6.20.2 Communications Infrastructure

Existing communications infrastructure is serving the site through the Telstra network. These services will be disconnected and made redundant as part of the new development works and replaced with new lead-ins.

In accordance with the policy on communications in new developments, where a project is within an NBN Co serviced area, NBN Co is the provider of last resort. NBN infrastructure is being rolled out in the area and is planned to be ready from June 2022, depending on the work required to permit premises to connect.

The proposal is at concept stage and the indicative basement design has not identified a dedicated NBN services room, however, there appears to be ample space to accommodate a dedicated room during the detailed design stage. It is anticipated that the network will enter the basement and run aerially into the service room. From there it will run aerially in the basement and up dedicated risers in each core of each building.

6.20.3 Wastewater/Sewer

The site is currently serviced via a 225mm Salt Glazed Ware pipe which feeds into a 225mm Vitrified Clay pipe, at the south-eastern corner of the site. An authority junction is located at the end of the pipe. It is anticipated that this will be the primary site connection.

A feasibility study would typically be issued to Sydney Water to confirm the connection point. However, in discussions with a Water Service Coordinator, the response time is currently over 8 months, due to the impacts of the COVID-19 pandemic on staffing and an increase in development demand.

The proposal is currently a concept proposal, with the detailed design proceeding in the subsequent stages. Considering the above, it is recommended that with the commencement of the detailed design of the first stage, a Notice of Requirements is sought from Sydney Water. This will confirm the connection point. Any required amplification of the mains and or encasements will be delivered with the first stage of the project. All costs associated with these works will be borne by the project.

6.20.4 Wastewater/Stormwater

The site is within the City of Parramatta LGA who manages and maintains the stormwater network. The area of Harris Park is also serviced by Sydney Water stormwater channels.

The site is bisected along the southern boundary by an open 6096mm wide x 1676mm high reinforced concrete channel. It will be proposed to discharge the stormwater directly into the channel following adequate water treatment.

6.20.4 Potable Water

The site is in the Sydney Water catchment for potable water infrastructure and the site is currently serviced via a 150mm Cast Iron Cement Lined water main located on the Western side of Gregory Place.

The proposal is currently a concept proposal, with the detailed design proceeding in the subsequent stages. Considering the above, it is recommended that with the commencement of the detailed design of the first stage, a Notice of Requirements is sought from Sydney Water. This will confirm the water supply provisions. Any required amplification or upgrading of the mains and will be delivered with the first stage of the Project.

It is noted that rainwater reuse is proposed to satisfy 80% of the apartments which will reduce the potable water demand.

6.20.5 Gas

The site is in the Jemena catchment for natural gas infrastructure. The site was serviced via a 100mm steel high pressure gas main with a pressure of 1050kPa, which is currently isolated. The service enters Gregory Place solely to service the site due to its past industrial uses.

Should the proposal seek connect to gas, the existing supply could be reinstated through consultation with the supply authority. The proposal is currently a concept proposal, with the detailed design proceeding in the subsequent stages. Considering the above, it is recommended that with the commencement of the detailed design of the first stage, consultation be undertaken with Jemena once the projects natural gas demand is determined.

Any required modification to the network will be delivered with the first stage of the project and all costs associated with these works will be borne by the project.

6.20.6 Road Infrastructure

Transport for NSW infrastructure is located within the vicinity of the site. A review of the provided plans identified that the infrastructure relates to the signalised intersection of Purchase Street and Hassall Street. This intersection is approximately 70 metres from our northern boundary and not impacted by the proposal.

6.21 Construction, Operation and Staging

The subject application seeks consent for concept approval initially in accordance with the provisions of section 4.21 and 4.22 of Part 4, Division 4.4 Concept development applications of the EP&A Act 1979, and subsequently the project will be staged.

A Staging Plan has been prepared by Stanisic architects and is included below and in the attached Architectural Plans. Subsequent staged DAs containing detailed design will be submitted in the future against the approved concept application and will include a Construction Management Plan in relation to how the construction and staging and operation of approved stages will be managed.

Figure 49: Staging Plan

6.22 Contributions and Public Benefit

6.22.1 *Contributions Plan*

Section 7.11 contributions will apply to the non-affordable portion of the development. The contribution is calculated according to the following formula:

Contribution ($) = net increase in residents X per resident contribution rate ($)

The applicable occupancy rates are shown in the following table.

Dwelling Size	Occupancy Rate
1 Bedroom dwelling	1.9 residents/dwelling
2 bedroom dwelling	2.2 residents/dwelling
3 bedroom dwelling	3.0 residents/dwelling
4 or more bedrooms	3.5 residents/dwelling

Table 13: Residential Occupancy Rates – Residential Accommodation, Parramatta Non-CBD (Source: City of Parramatta (Outside CBD) Development Contributions Plan 2021)

The contribution per dwelling is shown in the following table.

Dwelling Size	Contribution per Dwelling ($)
1 Bedroom dwelling	14,726
2 bedroom dwelling	17,051
3 bedroom dwelling	23,251
4 or more bedrooms	27,126

Table 14: Development Contributions Per Dwelling, Parramatta Non-CBD (Source: City of Parramatta (Outside CBD) Development Contributions Plan 2021)

The development will have a total of 483 units. Of these, 241 will be affordable housing. The following table shows the contributions for the non-social and non-affordable dwellings. With 241 affordable dwellings of the total of 483, the contributions would be a little more than $4 million in 2021 dollars.

	Total	Social/Affordable	Contribution Per Dwelling	Total Contributions
1 Bed	167	83	14,726	1,222,258
2 Bed	284	142	17,051	2,421,242
3 Bed	32	16	23,251	372,016
Total	483	241*		4,015,516

* Rounded down to the nearest whole unit

Table 15: Total 7.11 Contributions (Source: City of Parramatta (Outside CBD) Development Contributions Plan 2021, PPM Economics and Strategy)

6.22.2 *Public Benefit*

• ***Demonstrate a contribution to public benefit which is commensurate with the scale of the development.***

The public benefits stem from:

- Rental reduction for affordable housing residents
- Increased productivity from key workers living closer to their jobs
- Savings to key workers from not needing to commute as far
- Publicly accessible open space
- Through-links and walkability

Rental Reduction

The proposed development will have a total of 483 apartments. 241 of these will be "affordable" (that is, rented out at 80 per cent of the market rate). The median rent for a 2-bedroom apartment was $421 per week in March 2022. The affordable rent on the median 2-bedroom apartment would therefore be $336.80 per week. With an $84.20 discount per week, the weekly rental benefit for 241 units is $20,292. The annual rental benefit is just over $1 million and the net present value (using a 4 per cent discount rate) of the benefit over 10 years is just over $14 million.

Productivity Benefits

When key workers are in closer proximity to their employment, there are productivity benefits to the area. There are also wage and salary benefits that come from having the key workers living and spending their incomes in the area where they work. They also save on commuting, which place a large burden on key workers.

The annual benefit to the City of Parramatta from the proposed affordable housing development equates to the number of workers assisted per year at the minimum wage (if the median wage was used, the benefit would be higher). Assuming there are 2 workers per affordable household, at the minimum wage, 482 workers would be attracted to Parramatta who would otherwise live further out where housing was more affordable. It is also assumed that the workers would have had to live outside of the Parramatta LGA and commute every day to work in Parramatta. The benefit of the workers being in proximity to the Parramatta CBD. The annual benefit is around $20.4 million.

Commuting Benefits

In addition, new residents would otherwise have had to commute to their jobs in the Parramatta CBD. It is assumed that this commute is 2 hours per work day (1 hour each way) and applies to all adults in the development. The commuter benefit for the development is $3.6 million.

Taken together, the economic benefit of housing 482 key workers in close proximity to the CBD is $24.0 million per year, or $181 million over 10 years.

Public Open Space

Taking the land value, the cost of creating the park and value of visitation, the total economic benefit of the park would be $16.8 million (NPV of $13.6 million) over 10 years. Added to this is the maintenance that the owner will perform, valued at $227,754 (NPV of $183,551) over 10 years. The net present value of the net economic benefit of the park would be just under $21.2 million over 10 years.

It should be noted that the $21.2 million economic benefit does not represent costs to the developer or benefits given as contributions to Council – it represents the economic benefit to the Parramatta community of the public open space being created. Only the land and the creation costs are costs to the development. The rest of the benefits are the economic benefits created by the existence of the park.

Benefits of Through-links and Walkability

The goal of the proposed development is for it to be a walkable precinct, with new paths through the development to enable residents, locals and visitors to walk to Parramatta, the Parramatta River and the heritage attractions nearby.

The characteristics of a walkable town include:

- intact town centre with a quiet, pleasant main street containing a hearty, healthy set of stores
- residential densities including mixed income and mixed uses near the town centre
- many public places for people to assemble, play and associate with others within their neighbourhood
- universal design that respects and accommodates people of all abilities
- traffic on main street and in neighbourhoods that move at safe, pleasant and courteous speeds
- streets and trails that are well linked, often in a grid or other highly connected pattern
- design that is properly scaled allowing most residents to get to most services in 400m (walking distance)
- town is designed for people first, cars second
- town thinks small with caps on parking and store size
- the town has a vision and decision makers are visionary, communicative, and forward thinking.

In relation to the proposed development, it is likely that residents of the affordable units are currently commuting by car into Parramatta, but if they live in Gregory Place, they will be able to walk to work, shopping centres, public transport options and recreation activities. The proposal will have many of the characteristics

seen as “walkable”. The benefits include more viable retail spaces, less sedentary lifestyles and less time spent in cars and traffic. The through links will also be of benefit to the broader community, allowing them to interact better with the site and the heritage items that are adjacent.

6.23 Engagement

The SEARs requires detailed engagement be undertaken to demonstrate how it was consistent with the *Undertaking Engagement Guidelines for State Significant Projects*. Detail how issues raised and feedback provided have been considered and responded to in the project.

To seek stakeholder input into the concept DA, community and stakeholder engagement was undertaken by Forward Thinking between 25 April and 15 June 2022. The engagement has been conducted in line with the methodology and requirements outlined in the Department of Planning and Environment *Undertaking Engagement Guidelines for State Significant Projects, 2021*, and a summary of the methodology, findings and proponent response has been dealt with and addressed in detail under Section 5 of this EIS.

Forward Thinking have also conducted the SIA for the concept DA and the two processes have usefully informed one another. The SIA report provides an additional level of detail around social impacts and proposed mitigation measures for the site and can be read in conjunction with the Engagement Report. The Engagement Report is included at Appendix NN and the SIA is included at Appendix LL.

7. Justification of the Project

This section provides a justification and evaluation of the project as a whole, having regard to the economic, environmental and social impacts of the project and the principles of ecologically sustainable development.

7.1 Project Outline

This SSDA is for concept approval to facilitate a residential flat development at 2A Gregory Place, Harris Park. The concept will facilitate a residential apartment development 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 10,210m² (52.4%) of landscaped area on the ground plane, comprising courts, passages, accessways, parks and the Clay Cliff Creek channel walk.

The Project is classified as SSD as it comprises development for the purpose of '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, pursuant to Clause 27 of Schedule 1 of State Environmental Planning Policy (Planning Systems) 2021.

The site is zoned IN1 General Industrial, under which residential flat buildings are prohibited under the Parramatta LEP 2011.

However, on 19 July 2017, a SCC was issued by the department under the provisions of Clause 37 of Division 5 of the ARH SEPP .

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 1 for the development of a *"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 proposed development facilitated by the subject concept application, will create:

- 483 build-to-rent dwellings (of which 50% will be affordable housing)
- 48,685sq.m of total gross floor area.
- 10,210 sq.m of landscaped area
- $127.3 million of investment in the construction industry in Parramatta
- 433 jobs in total (direct and indirect).

7.2 Strategic Context

This EIS has demonstrated that the proposal is consistent with the strategic planning framework, and has been considered against key Government and Council documents including the following:

- Greater Sydney Region Plan – A Metropolis of Three Cities
- Central City District Plan
- Parramatta Local Strategic Planning Statement

- Parramatta Local Housing Strategy
- Parramatta Employment Lands Strategy

All levels of strategic planning seek to facilitate transit orientated development through the 30-minute city, in addition to seeking more affordable housing and facilitating ways for it to be delivered in projects.

In the case of the subject proposal, the Parramatta CBD is a short walk away, with the main train station being 700 metres. This connects future residents to a Metropolitan Centre within a few minutes and other areas of Greater Sydney with the 30-minute city targets.

Further, the proposal is for built-to-rent housing and supports a significant portion of affordable housing for low to medium income residents. At least 216 dwellings will be affordable housing for a minimum of 10 years. The Parramatta Local Strategic Planning Statement observes that that 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. In that context, the proposal seeks to directly assist with the housing affordability crisis in Parramatta.

In terms of the existing industrial zoning, importantly the Parramatta Employment Lands Strategy, which provides the direction for Parramatta's employment lands, identifies the subject site for future residential land subject to further investigation. The work undertaken with the Heritage Council Approvals Committee, the peer review process with Alec Tzannes and the presentation workshops with the State Design Review Panel have thoroughly Investigated the appropriateness of residential land use on the site and the bulk, form, scale and height that residential flat development should take.

In consideration of the concept proposal and what it facilitates against the strategic planning framework, the proposal is consistent and achieves many of the Government's priorities and actions.

7.3 Community Views

To seek stakeholder input into the concept DA, community and stakeholder engagement was undertaken by Forward Thinking between 25 April and 15 June 2022.

As engagement is occurring at the concept DA stage, the discussions that were conducted with key stakeholders and the community were at a relatively high level, broadly exploring the site and the opportunities/ constraints to the future redevelopment. Notwithstanding the relatively low levels of engagement, the following findings can be made:

- There was agreement across all engagement participants **that the site is of strategic importance and presents unique opportunities for redevelopment and renewal**. It's close proximity to Parramatta CBD, its location on the new Parramatta Light Rail, and its vicinity to state significant heritage items were cited by many participants.
- **History and heritage (including Aboriginal and Colonial history) are highly valued by the community,** and it will be important for development on the site to respect and enhance these values.
- There was **general support from most engagement participants for the sites redevelopment** and many indicated support for the concept DA on the provision that key impacts such as traffic, parking and overshadowing are managed on the site.

- **A small number of community members who live close to the site are concerned** about the proposal in particular: o Height and density of the proposal
  - The increase in traffic to the local area
  - Potential impacts on adjoining church and Hambledon Cottage
- Key agencies including the department and council emphasised **the importance of accessible pedestrian connections through the site**, and the opportunity the proposal provided to "open up" and "re-connect" the site to the surrounding local area.
- The department emphasised the importance of **providing community benefit provisions through each stage of the proposal** and not all at the end of the project. They also emphasised that the distribution and **quality of common places** (e.g. work from, home spaces, prayer spaces or gyms) will be important. These should ideally reflect the types of people likely to live there.
- Most participants were **supportive and positive about the open space, landscaping and place making opportunities** the proposal presented, particularly the Clay Cliff Creek walk. There was a desire for these spaces to be of high quality and useable.
- There was general support for the **affordable housing and BTR component** of the proposal with the exception of one community member who was of the view that it would bring "less desirable characters" to the area. Several key stakeholders acknowledged the **need for affordable housing in the Parramatta LGA**, on the provision that it is a **high-quality living environment, well managed and a suitable density**.
- A couple of stakeholders, including the council cited that there is currently **pressure on parks, open space and recreational facilities in the LGA**, and that where possible, the proposal could look to address some of these shortfalls, or at the least take the pressure off the current provision by providing adequate onsite facilities.

It is key to the process that the community are properly educated and engaged on what affordable housing is and the benefits it brings to the community. All too often, inaccurate communication is spread about affordable housing through the community which can bring about a very difficult negative process. The early engagement has assisted with a process that brings the community along the journey, which is clear from the feedback that there was general support for affordable housing and build to rent accommodation.

Generally, feedback was positive and where issues were raised about the type of development on the site, it was pleasing to note that many of those issues were part of the design framework and being addressed. In particular, the cultural importance of the site was acknowledged, which has led the design rather than a token response later. Further, the need for more open space is being facilitated, in addition to through accessible links. Many also acknowledged the need to redevelop the site, given the sensitivity of the location and eye sore building that currently occupies it.

7.4 Likely Impacts of the Proposal

This EIS has assessed the likely positive and negative economic, social and environmental impacts associated with the project. These are summarised below:

Economic

The direct expenditure of $127.3 million results in 340 jobs created in the construction sector in the Parramatta LGA. Further, it induces another 71 jobs due to the supply chain effect, and then another 21 due to the consumption effect, resulting in 433 jobs in total (direct and indirect).

The construction industry is most impacted, accounting for 354 jobs, while Retail Trade is next with 16 jobs and Transport, Postal and Warehousing and Manufacturing each with 12 jobs created.

The proposal will also facilitate the orderly and economic development of the land.

Social

The proposed development will have a total of 483 apartments. 241 of these will be affordable (as defined by the ARH SEPP and the Ministerial guideline that requires that a qualified tenant not spend more than 30% of their gross household income and or no more than 80% of the market rent)). The median rent for a 2-bedroom apartment was $421 per week in March 2022. The affordable rent on the median 2-bedroom apartment would therefore be $336.80 per week. With an $84.20 discount per week, the weekly rental benefit for 241 units is $20,292. The annual rental benefit is just over $1 million and the net present value (using a 4 per cent discount rate) of the benefit over 10 years is just over $14 million.

The proposal provides diverse housing options for the community and creates significant open space and through links to foster social interaction and recreation.

Environmental

The built environment has been carefully considered and remodelled through a lengthy and detailed design process led by the cultural landscape within which the site sits. Through detailed workshops and meetings with the Heritage Council Approval Committee, peer review processes with expert architects, and two presentations to the State Design Review Panel, the concept has evolved to provide a landscape led outcome, the responds to the European and Aboriginal heritage, with significant new planting and social benefits.

In terms of the natural environment, it is noted that early study found that there was no threatened species on the site and tree removal was focussed to items of no value (generally exempt species). Where opportunities to retain vegetation has occurred, this has been applied (generally on-site edges). The proposal seeks significant new planting to ensure the development sits within a landscape setting and is screened from certain viewpoints.

Further, a BDAR waiver was issued on 22 June 2022, confirming that "*the proposed development is not likely to have any significant impact on biodiversity values and therefore a Biodiversity Development Assessment Report is not required*".

Any items that emerge through the development process following determination of the concept application can be suitably managed.

7.5 Suitability of the Site

The site has been identified through councils local strategic planning framework as being suitable for residential land use. Further, residential flat buildings have been made permissibility on the site through a SCC issued on 19 July 2016, whereby the department determined that the proposed development *"is compatible with the surrounding land uses*" 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".

Given the site is currently home to industrial development, in the form of a disused former pharmaceuticals assembly and light industrial complex (ca 1950s), which is an isolated pocket of industrial zoned land, and there are sensitive land uses in the form of heritage listings, open space, and residential development, the site is clearly suitable for a form of residential development that is compatible with the existing and future context for the site and area.

In terms of the suitability of the concept of the subject site, the proposal has evolved significantly since the concept that was considered through the SCC process. The SCC required consultation with the Heritage NSW and the Heritage Council, in addition to further consideration of the form, bulk, scale, setbacks, landscaping and residential amenity. The subsequent three years were spent working with the HCAC on the design outcome, location of building footprints, heights and interface with the heritage items.

On 2 March 2021, the NSW Heritage Council determined that, following the detailed study of the site and development outcome, it "*supports progression of the scheme to Stage 1 Development Application*". A concept application has subsequently been prepared, with further input during an expert peer review process with Alec Tzannes and two presentations to the SDRP.

Therefore, the input from leading experts and Government advice, a concept has been prepared that is consistent and aligns with the process undertaken since 2016. This work has demonstrated that the proposal is suitable for the site. As detailed designs for applications of development are prepared, further consideration of suitability will be required as the concept is refined for development.

7.4 Public Interest

The proposal is considered to be in the public interest for the following reasons:

- The proposal will facilitate a significant amount of affordable housing within a strategic location close to transport, jobs, goods and services, entertainment and education.
- The site is a decaying industrial factory not suitable to the location. The site is in need of urban renewal and has been identified for residential in the local strategic planning framework and supported for residential flat development by the NSW Government through the site compatibility certificate.
- The proposal will facilitate the orderly and economic development of the land.
- The proposal will create over 10,000sq.m of landscaped areas within the site, a significant amount compared to the existing situation. This includes courtyards, walkways, through links for the broader community, and numerous roof top open spaces for the local community. This has benefits that encourage social interaction and recreation.
- The concept has been through a detailed design process led by the cultural landscape within which the site is located.
- The proposal creates significant construction jobs in the short term and long-term benefits for the local Parramatta economy.
- The proposal is consistent with the local strategic planning framework and is consistent with the conditions of the site compatibility certificate.

Having regard to the matters considered in this EIS, the relevant impacts and the design led process undertaken over a number of years, the proposal is in the public interest and is appropriate for the site.