

Amendment report- State significant development
Affordable housing and build to rent
Concept development application
2A Gregory Place, Harris Park



Submitted to Department of Planning, Housing and Infrastructure

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A	Response to submissions report, August 2025	Pacific Planning
B	Submissions Response Register	Pacific Planning
C	Amended co-design report	Tzannes
D	Clause 4.6 request – building height	Pacific Planning
E	Legal opinion – Housing SEPP, clause 4.6 and division 5 framework (CONFIDENTIAL)	Jason Lazarus SC & Justin Doyle
F	Visual impact Assessment	Tzannes
G	Accessibility assessment report	Nest Consulting
H	BCA assessment report	Nest Consulting
I	Updated Environmental wind study	SLR Consulting
J	Updated Ecologically Sustainable Design report	SLR Consulting
K	Updated Demolition/Construction and Operational Waste management plan	Auswide Consulting
L	Updated Acoustic assessment	Renzo Tonin
M	Updated Construction noise and vibration management plan	Renzo Tonin
N	Updated integrated water management plan	Kozarovski and Partners
O	Updated flood assessment	GRC Hydro
P	Flood emergency response plan	GRC Hydro
Q	Updated statement of heritage impact	GBA Heritage
R	Contamination response letter	Sullivan Environmental Sciences
S	Aboriginal and historical archaeological response to submissions	Dominic Steele Consulting Archaeology
T	Updated Aboriginal cultural heritage assessment report	Dominic Steele Consulting Archaeology
U	Updated historical archaeological heritage impact assessment	Dominic Steele Consulting Archaeology
V	Transport and accessibility impact assessment	SCT Consulting

Ref.	Document	Prepared by
W	Preliminary Construction traffic management plan	SCT Consulting
X	Green travel plan	SCT Consulting
Y	Updated social impact assessment	Forward Thinking
Z	Updated community and stakeholder engagement report	Forward Thinking
AA	Construction management plan	2A Gregory Place Pty Ltd
BB	Draft plan of management	2A Gregory Place Pty Ltd
CC	Updated economic impact assessment and feasibility analysis	Pacific Economics and Sustainability
DD	Updated Cost report	APL Quantity Surveyors
EE	Hydrogeological response letter	Reditus Consulting Pty Ltd
FF	Updated Infrastructure delivery, management and staging report	2A Gregory Place Pty Ltd
GG	Updated Arboricultural impact assessment and tree protection management plan	Horticultural Management Services
HH	BDAR waiver application	MJD Environmental

List of abbreviations

Abbreviation	Term
SSD	State significant development
EIS	Environmental impact statement
RTS	Response to submissions
EP&A Act	Environmental Planning and Assessment Act 1979
Regulation	Environmental Planning and Assessment Regulation 2021
SEPP	State environmental planning policy
Housing SEPP	State Environmental Planning Policy (Housing) 2021
Planning Systems SEPP	State Environmental Planning Policy (Planning Systems) 2021
SCC	Site Compatibility Certificate
LEP	Local environmental plan
Parramatta LEP 2011	Parramatta Local Environmental Plan 2011
Parramatta LEP 2023	Parramatta Local Environmental Plan 2023
DCP	Development control plan

Abbreviation	Term
BTR	Build-to-rent
CHP	Community housing provider
GFA	Gross floor area
FSR	Floor space ratio
LGA	Local government area
ESD	Ecologically sustainable development
SIA	Social impact assessment
VIA	Visual impact assessment
BDAR	Biodiversity Development Assessment Report
DPI	Department of Primary Industries
IPC	Independent Planning Commission

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1	December 2025	Detailed amendment report structure and assessment	Matthew Daniel	JM, MD, RR.
1.1	December 2025	Text review, review and adjust assessment of impacts , adjustment of figures, tables and appendices	James Matthews	MD, RR

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Executive summary

This amendment report has been prepared to support determination of the State significant development (SSD) concept application for 2A Gregory Place, Harris Park. The original SSD concept scheme, accompanied by an EIS, was exhibited in 2022. Since exhibition, the project has been the subject of extensive design review, submissions analysis, additional technical work and further engagement with the Department of Planning, Housing and Infrastructure (the department), City of Parramatta Council (the council), the Heritage Council of NSW, the National Trust of Australia (NSW), Parramatta & District Historical Society, Museums of History NSW, Aboriginal knowledge holders and local stakeholders.

The department has requested that the current material be submitted as an amendment application, rather than as a response to submissions alone. This report explains the amended concept scheme, assesses its impacts and provides a justification that reflects both the improvements achieved and the compromises made. The supporting technical reports have been updated to reflect the amendment context and are listed in Table 1.

The amended scheme continues to be assessed as SSD under the Environmental Planning and Assessment Act 1979, relying on division 5 of chapter 2 of State Environmental Planning Policy (Housing) 2021 (Housing SEPP) and the Site Compatibility Certificate (SCC) issued in 2017 for affordable housing on the site. Parramatta Local Environmental Plan 2011 (Parramatta LEP 2011) remains the applicable local environmental plan by virtue of the savings provision in Parramatta Local Environmental Plan 2023. State Environmental Planning Policy (Planning Systems) 2021 (Planning Systems SEPP) has been amended since exhibition; clause 2.7(7) now reserves determination of this build-to-rent SSD to the Minister for Planning as consent authority, and joint senior counsel and counsel advice confirms that treating the Independent Planning Commission (IPC) as consent authority would carry a material risk of legal error and third-party judicial review. The legal framework, including the operation of division 5, the SCC and clause 4.6, is summarised in section 4.

The amended concept substantially recalibrates the exhibited scheme. The indicative dwelling yield has been reduced from 483 to 320 dwellings. The proportion of affordable housing is maintained at 50 per cent of the total yield, implying an estimated 160 affordable rentals, but this represents a reduction in absolute affordable dwelling numbers compared with earlier concepts. Gross floor area (GFA) has reduced from 48,685 to 31,073 square metres and floor space ratio (FSR) from 2.5:1 to 1.59:1. Car parking has reduced from 634 to 359 spaces. Setbacks have been increased, particularly to Hambledon Cottage, Experiment Farm and Gregory Place; building footprints and massing have been refined; and a larger proportion of the site is now allocated to deep soil, landscape and publicly accessible open space.

Key quantitative elements of the amended scheme include the following:

- 320 dwellings in total, and an estimated 160 affordable rental dwellings to be managed by a registered community housing provider.
- 31,073 square metres of GFA at an indicative FSR of 1.59:1.
- 359 car parking spaces, reflecting a reduced parking rate that responds to the build-to-rent and affordable housing focus and the site's proximity to high-frequency public transport.

- Publicly accessible open space of approximately 8,908.7 square metres and communal open space of approximately 3,582.4 square metres, providing a combined open space provision of 12,491.2 square metres (about 64 per cent of the site).
- Total soil-capable area of approximately 6,036.4 square metres (about 31 per cent of the site), comprising deep soil and soil-at-grade areas, with increased widths and continuity along the northern and western edges and the Clay Cliff Creek stormwater channel corridor.

The updated design, landscape and Connecting with Country material prepared through a co-design process by Tzannes and Yerrabingin shows that these changes deliver a qualitatively different built form and landscape outcome to the exhibited 2022 scheme. The existing factory and hardstand are removed and replaced with a network of parks, a green spine and a 30 metre wide publicly accessible park between Hambledon Cottage and Our Lady of Lebanon Co-Cathedral, which creates a physical and visual connection between the two buildings. Building envelopes are slimmer and more broken down; height is redistributed away from the most sensitive interfaces; and the colonial landscape, creek corridor and pre-colonial narratives are given greater prominence in the overall place structure.

The updated statement of heritage impact and visual impact assessment conclude that, while the amended development remains a large, visible intervention in a sensitive colonial landscape, it is an acceptable and well considered proposal which represents a materially improved and compatible outcome compared with both the existing industrial use and the exhibited concept. Significantly, the Heritage Council Approvals Committee in their 30 September 2025 meeting, resolved to support the current scheme, noting in particular the reduction in dwelling numbers and massing, the enhanced landscape and Connecting with Country framework and the strengthened open space linkages around Hambledon Cottage.

On social and economic matters, the updated social impact assessment and economic impact assessment confirm that the Gregory Place site remains an excellent location for additional housing and affordable housing. Rental vacancy rates in Parramatta and Harris Park are at or below two per cent. The proposed 320 dwellings, with half to be let at discounted rents under the Housing SEPP, will make a significant contribution to local housing supply and to alleviating housing stress for key workers and lower-income households. The economic analysis estimates that the discounted rental and commuting benefits to tenants in the affordable dwellings have a combined net present value of approximately \$19.7 million over 15 years, in addition to broader productivity and labour force benefits. The construction phase is expected to generate in the order of 861 jobs in total (direct and indirect), with further ongoing employment in management and maintenance.

At the same time, the amendment results in a real loss of potential housing and affordable housing yield relative to the original SCC 2017 vision. Earlier concepts contemplated up to 483 dwellings, with a larger absolute number of affordable dwellings, within a 100 per cent build-to-rent configuration. Under 2017 construction cost and interest rate settings, that configuration would have been more readily deliverable than it is today. The updated feasibility testing therefore focuses on the amended 320-dwelling scheme and confirms that it can be delivered on reasonable assumptions, while maintaining 50 per cent of dwellings as affordable rental housing. The analysis also notes that an industrial park remains a feasible alternative use under the existing zoning, illustrating both the need for a timely determination and the limited scope for further material erosion of dwelling yield or the introduction of additional cost burdens without re-examining delivery pathways.

The amended project must therefore be understood as a compromise. It delivers fewer total and affordable dwellings than were once contemplated, but it does so in a form that materially improves heritage, landscape and environmental performance and remains realistically deliverable in current market conditions. Sections 6 and 7 of this report explicitly acknowledge this trade-off and assess whether the amended scheme still represents a justified and compatible outcome in the public interest when measured against the Environmental Planning and Assessment Act, the Housing SEPP division 5 framework, the SCC and relevant strategic policies.

The assessment concludes that the amended concept:

- Provides a significantly improved built form, heritage and landscape response to the Harris Park colonial precinct, endorsed in principle by the Heritage Council’s delegate, while accepting that visible change will occur if the site is to accommodate new housing.
- Delivers a substantial quantum of well-located rental and affordable rental housing in a local government area experiencing acute housing stress, albeit at a lower yield than earlier concepts.
- Achieves acceptable and in some respects improved environmental performance relative to the exhibited scheme, including in relation to open space, deep soil, transport, flood risk and ecologically sustainable development measures.
- Is supported by feasibility analysis indicating that it can be delivered on reasonable assumptions in current market conditions. That analysis also indicates that feasibility margins are tight and that further material reductions in scale or additional cost burdens could not be accommodated without careful reconsideration of delivery pathways, noting that an industrial redevelopment remains a permissible and realistic alternative on this site.

Having regard to these factors, the report concludes that the amended concept proposal for 2A Gregory Place, Harris Park is justified on balance and is in the public interest. It is proposal as amended and promotes a realistic and carefully calibrated response that balances heritage and environmental values, acute housing and affordability needs and the practical requirement that any approval must be capable of being financed, constructed and operated as intended.

1 Introduction

This amendment report has been prepared on behalf of 2A Gregory Place Pty Ltd (the applicant) in support of an amendment to the current SSD concept application for mixed tenure residential and build-to-rent housing at 2A Gregory Place, Harris Park. The SSD application seeks concept approval for residential buildings, associated non-residential uses, public and common open space, and related infrastructure and landscaping on land within the Harris Park colonial and parkland setting.

The original EIS and SSD concept application were publicly exhibited in 2022. Following exhibition, the Department of Planning, Housing and Infrastructure (the department) received submissions from public authorities, City of Parramatta Council (the council) and members of the community. The submissions raised issues including heritage and landscape impacts within the Harris Park colonial precinct, built form scale and character, traffic and parking, residential amenity, and the evolving design response to Connecting with Country.

In response, the applicant prepared a comprehensive RTS report in 2025, supported by updated architectural, heritage, social, visual, landscape, archaeological, traffic, flooding and environmental assessments. That material presented an amended concept scheme which significantly recalibrated the proposal, including reduced overall density, re-shaped building envelopes, increased setbacks, additional deep soil and landscaping, enhanced public domain connections and a clearer integration of Connecting with Country and heritage interpretation outcomes.

The department has subsequently appropriately requested that the updated concept scheme and supporting technical material be presented as an amendment application with an accompanying amendment report, in accordance with the State significant development guidelines – preparing an amendment report. That proposed process is supported by the applicant. Therefore, as per clause 37(1) of the Environmental Planning and Assessment Regulation 2021 (Reg 2021) this amendment report formally seeks to request that the Minister consider an amended development application to the original development application as made. The previously submitted RTS 2025 which provided detailed and comprehensive responses to the submissions assists this amendment report. It describes the proposed amendments to the original SSD concept application, summarises the findings of the updated technical studies and engagement, and provides an integrated assessment of the amended project having regard to its economic, environmental and social impacts and the principles of ecologically sustainable development.

The amended scheme has been directly shaped by the issues raised in public and agency submissions on the exhibited SSD application, and the response to submissions report (Appendix A) explicitly steps through those submissions; that report should be read concurrently with this amendment report so that the department and the consent authority can see both the detailed response matrix and the way those responses have informed the current concept design.

A concise overview of the original lodged and exhibited concept proposal is provided in section 1.1. Section 1.2 then outlines the nature and rationale for the amendments at a high level. Section 2 summarises the strategic planning context, drawing on the original EIS and subsequent RTS and noting any material changes since exhibition. Sections 3 to 7 address, respectively, the description of the amendments, statutory context, community engagement, assessment of impacts and justification of the amended project, consistent with the amendment guideline.

1.1 Original project overview

The original SSD concept application sought approval for a residential-led mixed use precinct comprising approximately 483 dwellings, of which 242 dwellings (50 per cent) were to be delivered as affordable housing. The indicative gross floor area (GFA) was 48,685 square metres, with an overall floor space ratio (FSR) of 2.5:1 and a maximum building height of 27.9 metres. The scheme included two basement levels providing approximately 634 car parking spaces and proposed a relatively intensive building footprint across the site, with a predominant eight-storey built form and reduced setbacks to Hambledon Cottage, Experiment Farm and the Clay Cliff Creek stormwater channel corridor. Provision for formal public open space and a continuous landscaped connection between the surrounding heritage items and the creek alignment was more limited.

1.2 Overview of amendments and reasons for change

Following public exhibition, the applicant undertook a thorough review of the submissions and wider policy context and engaged a new lead design team and specialist consultants to reconsider the proposal. The revised design process was informed by additional and comprehensive heritage, social impact, landscape, visual, movement, flooding, environmental and economic analysis, together with further consultation with key stakeholders, including the Heritage Council, the council, local community representatives and Aboriginal knowledge holders contributing to the Connecting with Country framework.

This work led to a substantially amended concept scheme. In summary terms, the amended project: reduces the overall number of dwellings and GFA; retains a significant affordable housing component while refining the dwelling mix and build-to-rent product; redistributes building height and mass away from the most sensitive heritage interfaces; increases setbacks and separation distances; expands and consolidates deep soil and landscaped areas; strengthens public access and visual connections between Hambledon Cottage, Experiment Farm and the broader open space network; and embeds Connecting with Country and heritage interpretation as core structuring elements of the precinct landscape and public domain.

The primary reasons for the amendments are to respond constructively to issues raised in submissions and in expert advice, to enhance protection and appreciation of the State and local heritage values associated with the Harris Park colonial precinct, to improve solar access, visual and amenity outcomes for surrounding development and public spaces, and to deliver a more environmentally resilient, socially inclusive and feasible housing outcome that remains consistent with relevant metropolitan, district and local housing objectives. The subsequent sections of this amendment report describe and assess the amended project in that context.

1.3 Updated supporting documentation

In preparing this amendment report, all key plans and technical studies for the project have been reviewed and, where necessary, updated to reflect the amended concept scheme and the department's request that the 2025 material be treated as an amendment to the exhibited SSD application rather than as a response to submissions alone. The intention is that the consent authority and the department can assess the amended proposal on the basis of a single, internally consistent suite of plans and reports that describe, analyse and justify the current scheme.

The updated documents fall into three broad categories. First, there are design and place-making documents that define the amended concept, including the architectural design report and

reference scheme, consolidated design guidelines, landscape design report and plans, and the Connecting with Country strategy. Secondly, there are technical assessments that have been reissued or supplemented to test the amended scheme, including heritage, visual impact, transport and accessibility, flood and water management, arboriculture, social impact, economic feasibility and environmental performance. Thirdly, there are statutory and management documents, including the amended clause 4.6 request, updated legal advice, management plans and implementation strategies, which provide the framework for consent conditions and future detailed design.

The original EIS and the 2025 response to submissions report remain important background documents, particularly in relation to the exhibition history and the detailed submissions matrix. However, where there is any inconsistency between earlier documents and the reports listed in Table 1, the updated documents should be preferred for the purpose of understanding and assessing the amended concept scheme. Certain legal opinions are provided under separate cover for confidentiality reasons, but their conclusions are summarised in this amendment report and have informed the statutory and justification sections.

Table 1 provides a quick reference index to the updated and supporting documents that accompany this amendment report. It identifies the reference number, title, author and primary role of each document so that the department can readily locate the material relevant to particular issues during its assessment and in preparing a recommendation for determination.

Table 1 Updated plans and technical reports accompanying the amendment application

App	Document	Prepared by	Primary role in amendment context
A	Response to submissions report, August 2025	Pacific Planning	Summarises and responds to issues raised during exhibition and subsequent consultation; now read together with this amendment report as the historical submissions record and detailed response matrix.
B	Submissions Response Register	Pacific Planning	Provides a matrix identifying each submission and the location in the submission package for a response.
C	Amended co-design report, including: ▪ Concept Plans ▪ Reference Scheme ▪ Landscape design strategy ▪ Landscape Plans ▪ Connecting with Country strategy ▪ Responses to submissions including DPHI peer review, SDRP3 and stakeholders	Tzannes & Yerrabingin	Defines the amended concept scheme, explains the design response to submissions, SDRP and peer review, and sets the reference scheme and design controls that underpin built form, massing, setbacks, landscape structure and architectural character. Details the amended landscape strategy, including planting design, deep soil layout, open space programming and integration with Connecting with Country and heritage interpretation.

App	Document	Prepared by	Primary role in amendment context
	- Design Guidelines - Updated visualisations		Provides updated illustrative and technical landscape drawings that spatially implement the amended landscape design report, including planting, levels and key public domain elements. Articulates the Country-led design framework and cultural narrative for the amended scheme, guiding landscape, public domain, interpretation and water-sensitive design responses. Provides the binding design controls for the future detailed design stage, including height, setbacks, building envelopes, articulation, materials and key landscape and public domain parameters for the amended scheme.
D	Clause 4.6 request – building height	Pacific Planning	Provides the updated clause 4.6 written request for variation to the Parramatta LEP 2011 height of buildings standard, tailored to the amended envelopes and heritage/landscape outcomes.
E	Legal opinion – Housing SEPP, clause 4.6 and division 5 framework (CONFIDENTIAL)	Jason Lazarus SC & Justin Doyle	Sets out the legal framework for the operation of the Housing SEPP division 5, the SCC and clause 4.6 in the context of the amended project, and informs the statutory analysis in this amendment report.
F	Visual impact Assessment	Tzannes	Assesses the visual impacts of the amended scheme from key public and private viewpoints, including views to and from Hambledon Cottage, Experiment Farm and Our Lady of Lebanon Co-Cathedral.
G	Accessibility assessment report	Nest Consulting	Evaluates the amended design against accessibility and universal design requirements, including compliance with the Disability Discrimination Act, NCC and relevant accessibility standards.
H	BCA assessment report	Nest Consulting	Reviews the amended concept against key Building Code of Australia provisions and identifies any critical compliance matters to be addressed at detailed design.

App	Document	Prepared by	Primary role in amendment context
I	Updated Environmental wind study	SLR Consulting	Evaluates wind conditions generated by the amended building envelopes, particularly in public domain and communal open spaces, and recommends any necessary mitigation measures.
J	Updated Ecologically Sustainable Design report	SLR Consulting	Assesses the amended scheme against ecologically sustainable development benchmarks, including energy, water, thermal comfort and broader sustainability initiatives.
K	Updated Demolition/Construction and Operational Waste management plan	Auswide Consulting	Sets out updated strategies for waste storage, collection and recycling for the amended scheme, having regard to the revised dwelling mix, non-residential uses and access layout.
L	Updated Acoustic assessment	Renzo Tonin	Assesses operational noise impacts (including traffic, rail and mechanical plant) on the amended residential and non-residential uses and recommends façade and building services treatments.
M	Updated Construction noise and vibration management plan	Renzo Tonin	Provides an updated framework for managing construction noise and vibration for demolition, excavation and building works associated with the amended concept.
N	Updated integrated water management plan (including catchment diagram, stormwater design, WSUD and DRAINS model outputs)	Kozarovski and Partners	Sets out the amended stormwater, water quality and water-sensitive urban design approach, including DRAINS hydraulic/hydrologic modelling to demonstrate system performance for the revised layout.
O	Updated flood assessment	GRC Hydro	Re-assesses flooding impacts and flood behaviour for the amended scheme, confirming flood levels, hazard categories and design responses for buildings and access routes.
P	Flood emergency response plan	GRC Hydro	Provides updated emergency response procedures for flood events, tailored to the amended building layout, residential population and access arrangements.

App	Document	Prepared by	Primary role in amendment context
Q	Updated statement of heritage impact (including statement of significance, focused cultural landscape evolution report and Clay Cliff Creek heritage analysis)	GBA Heritage	Assesses the heritage impacts of the amended scheme on Hambledon Cottage, the Harris Park colonial precinct and related heritage values, and explains the cultural landscape approach and creek corridor analysis.
R	Contamination response letter	Sullivan Environmental Sciences	Responds to contamination-related issues, confirming the remediation and management approach for the amended development footprint and construction staging.
S	Aboriginal and historical archaeological response to submissions	Dominic Steele Consulting Archaeology	Addresses archaeological issues raised in submissions and explains how the amended scheme and staged excavation strategy respond to Aboriginal and historical archaeological potential.
T	Updated Aboriginal cultural heritage assessment report	Dominic Steele Consulting Archaeology	Provides an updated assessment of Aboriginal cultural heritage values and archaeological potential for the amended scheme and confirms consultation and management measures.
U	Updated historical archaeological heritage impact assessment	Dominic Steele Consulting Archaeology	Reviews historical archaeological potential and impacts for the amended proposal and outlines recommended investigation, monitoring and unexpected finds procedures.
V	Transport and accessibility impact assessment	SCT Consulting	Assesses traffic, parking, access, public transport and active transport implications of the amended scheme, including comparison with the exhibited concept and industrial use scenarios.
W	Preliminary Construction traffic management plan	SCT Consulting	Outlines traffic and access arrangements during demolition and construction for the amended scheme, including routes, timing and safety measures.
X	Green travel plan	SCT Consulting	Sets out measures to encourage sustainable travel behaviour for future residents and visitors, aligned with the

App	Document	Prepared by	Primary role in amendment context
			amended dwelling mix and parking provision.
Y	Updated social impact assessment	Forward Thinking	Evaluates the social impacts of the amended scheme, including affordable housing outcomes, community wellbeing, safety, cohesion and access to services, with explicit comparison to earlier concepts.
Z	Updated community and stakeholder engagement report	Forward Thinking	Documents the engagement process (including exhibition, agency and heritage consultation) and explains how feedback has informed the amended scheme.
AA	Construction management plan	2A Gregory Place Pty Ltd	Provides the overarching framework for managing construction activities, safety, environmental controls and community liaison for the amended project.
BB	Draft plan of management	2A Gregory Place Pty Ltd	Outlines the proposed estate and tenancy management framework for the amended build-to-rent and affordable housing precinct, including operational, maintenance and community management arrangements.
CC	Updated economic impact assessment and feasibility analysis	Pacific Economics and Sustainability	Assesses the economic impacts, viability and feasibility of the amended 320-dwelling concept (including affordable housing scenarios) and compares residential and industrial development options under current market conditions.
DD	Updated Cost report	APL Quantity Surveyors	Provides updated construction cost estimates for the amended scheme, informing the economic feasibility and viability testing.
EE	Hydrogeological response letter	Reditus Consulting Pty Ltd	Addresses aquifer interference and groundwater issues associated with the amended basement and foundation design and confirms compliance with relevant water legislation and guideline requirements.
FF	Updated Infrastructure delivery, management and staging report	2A Gregory Place Pty Ltd	Describes the staging, delivery and future management of physical and social infrastructure required to support the amended development, including servicing, upgrades and timing.

App	Document	Prepared by	Primary role in amendment context
GG	Updated Arboricultural impact assessment and tree protection management plan	Horticultural Management Services	Assesses tree retention and removal for the amended scheme, identifies tree protection zones and prescribes management measures and compensatory planting to support the revised deep soil and landscape layout.
HH	BDAR waiver approval	MJD Environmental	Confirms that a Biodiversity Development Assessment Report is not required for the amended scheme, based on updated ecological and impact analysis.

2 Strategic context

The strategic context for the amended project was analysed in detail in the original EIS and the subsequent RTS. That material demonstrated that the Gregory Place precinct is exceptionally well located to contribute to the delivery of additional housing, including affordable and build-to-rent housing, within the Parramatta central business district catchment, and that the site's desired future character is residential rather than industrial. This section provides a concise update and synthesis of that analysis, with a particular focus on how the strategic context informs and supports the proposed amendments.

At the metropolitan and district scale, the site sits within the Central River City as defined in the Greater Sydney Region Plan and the Central City District Plan. Those strategies identify Parramatta as the metropolitan centre for the Central River City and a primary focus for additional housing and employment growth. They emphasise concentrating higher density housing in locations with excellent access to public transport, jobs, services and social infrastructure, while also protecting and enhancing heritage values and green space networks. The land at 2A Gregory Place is within walking distance of Parramatta and Harris Park railway stations, the Parramatta bus interchange and Parramatta light rail, and lies east of the commercial core. It therefore meets the criteria for transit-oriented renewal while also adjoining a highly sensitive colonial and parkland landscape, which necessitates a carefully calibrated built form and landscape response rather than maximisation of yield for its own sake.

The City of Parramatta's Local Strategic Planning Statement (LSPS) and Local Housing Strategy further reinforce this role. The LSPS presents a vision of Parramatta as a bustling, cosmopolitan and vibrant metropolis, supported by diverse residential neighbourhoods and high-quality open spaces. It identifies housing diversity, affordable housing, enhancement of heritage and culture, new open space through precinct planning and improved access to infrastructure as key liveability priorities. The Local Housing Strategy recognises significant forecast growth in high-density housing, much of it in precincts led by the state and the council, and notes that in 2016 the local government area already exhibited high levels of housing, rental and mortgage stress, as well as rising homelessness. Within that context, well-located affordable and rental housing is framed as a critical response to structural housing pressures rather than a discretionary add-on.

The council's Employment Lands Strategy and its 2020 Review and Update provide important additional context. Although the site is currently zoned IN1 General Industrial, the strategy expressly

identifies the land as a location where rezoning to residential should be investigated. The strategy recognises the changing function of inner-urban industrial lands and the opportunity, in selected locations, to transition underutilised employment land to higher and better uses that align with the evolving role of Parramatta as a central city. For Gregory Place, the strategic planning framework therefore already anticipates a shift away from general industrial uses towards a residential and mixed-use outcome, subject to a satisfactory response to heritage, landscape, access and amenity considerations. The amended project, while reducing overall density relative to the original concept scheme, remains firmly within that strategic direction by replacing a deteriorating industrial site with a carefully designed residential-led precinct.

At the local level, the amended project continues to support the council’s objectives to increase housing supply and choice in and around the Parramatta central business district, reinforce Parramatta’s role as a major centre, and enhance connections between heritage places, open spaces and the Parramatta River corridor. The site is integrated with existing and planned walking and cycling links, including the Clay Cliff Creek stormwater channel corridor, and is proximate to schools, health services, places of worship and employment. These locational attributes underpin the project’s suitability for affordable and build-to-rent housing, where long-term rental tenure, access to jobs and services, and reduced transport costs deliver substantial social and economic benefits for lower-income households.

Since lodgement of the original SSD application, Parramatta Local Environmental Plan 2023 has commenced. The SSD application benefits from savings provisions that require it to be determined as if the new local environmental plan had not commenced, and the primary statutory assessment therefore remains against Parramatta Local Environmental Plan 2011 and applicable State environmental planning policies. Nonetheless, the commencement of Parramatta Local Environmental Plan 2023 and the intensification of housing and rental stress in the intervening period have reinforced rather than weakened the strategic case for well-located affordable and rental housing. Updated social and economic analysis prepared for the RTS confirms a continuing shortfall of affordable rental housing within the local government area and increasing pressure on lower-income renters. In that environment, the amended project, even with a reduced overall yield, continues to make a material contribution to meeting identified housing need, while delivering a better balanced and more compatible built form and landscape outcome within the Harris Park colonial precinct.

3 Description of amendments

This section describes the amendments to the exhibited SSD concept proposal for 2A Gregory Place, Harris Park. It explains how the amended concept scheme differs from the original lodged and exhibited concept in quantitative terms (dwellings, gross floor area, height, setbacks, landscape and parking) and in qualitative terms (built form strategy, landscape structure, heritage interfaces and access arrangements).

The changes summarised below are reflected in the amended architectural plans, updated design report and supporting technical documentation. For ease of reference, an amended project summary table (Table 2) has been prepared in this amendment report, drawing on the “Summary of changes” table in the RTS (PAGE 134).

3.1 Amended project overview

The original exhibited concept scheme was a residential-led mixed use precinct comprising 483 dwellings, including 242 affordable dwellings (50 per cent), with an indicative gross floor area (GFA) of 48,685 square metres and an overall floor space ratio (FSR) of 2.5:1. It proposed a maximum height of 27.9 metres, a relatively continuous eight-storey building form across much of the site, and two basement levels providing 634 car parking spaces. Landscape and open space were more fragmented, with narrower setbacks to Hambledon Cottage, Experiment Farm and the Clay Cliff Creek stormwater channel.

The amended concept scheme substantially reduces overall density and redistributes building bulk while maintaining the mixed tenure intent and a strong affordable housing component. The indicative dwelling yield is reduced from 483 to 320 dwellings, with affordable housing retained at 50 per cent of the total (160 affordable dwellings). A modest 141 square metres of retail or non-residential floor space is introduced at ground level to support local activation and services. GFA is reduced to 31,073 square metres, with the corresponding FSR reduced to 1.59:1, representing a reduction of around one-third in overall floorspace compared with the original concept.

The revised scheme retains a maximum building height of eight storeys, with a marginal numerical increase in maximum height from 27.9 metres to 29 metres. This height is now concentrated in the central and southern parts of the site away from the most sensitive heritage curtilages. Along the northern and western interfaces with Hambledon Cottage and Experiment Farm Reserve, the built form steps down to between two and four storeys, with significantly increased setbacks and a refined footprint to create broader view corridors and a more spacious landscape buffer.

Two basement levels are retained but car parking provision is significantly reduced from 634 to 359 spaces, better aligning with the site's transit-oriented location and the build-to-rent and affordable housing model. The landscape and open space structure is recast to deliver approximately 12,491 square metres of total open space (about 64 per cent of the site area), including 8,908.7 square metres of publicly accessible open space and 3,582.4 square metres of communal open space. The total soil area (deep, additional and constructed soil) is 6,036.4 square metres, representing 31 per cent of the site area, with deep soil proper increasing from 5,700 to 6,036.4 square metres.

In terms of the concept footprints, elevations and massing, for which this application seeks consent, a comparison of the 2022 concept design with the 2025 amended concept design is illustrated in the figures below:



Figure 1: 2022 Concept footprints

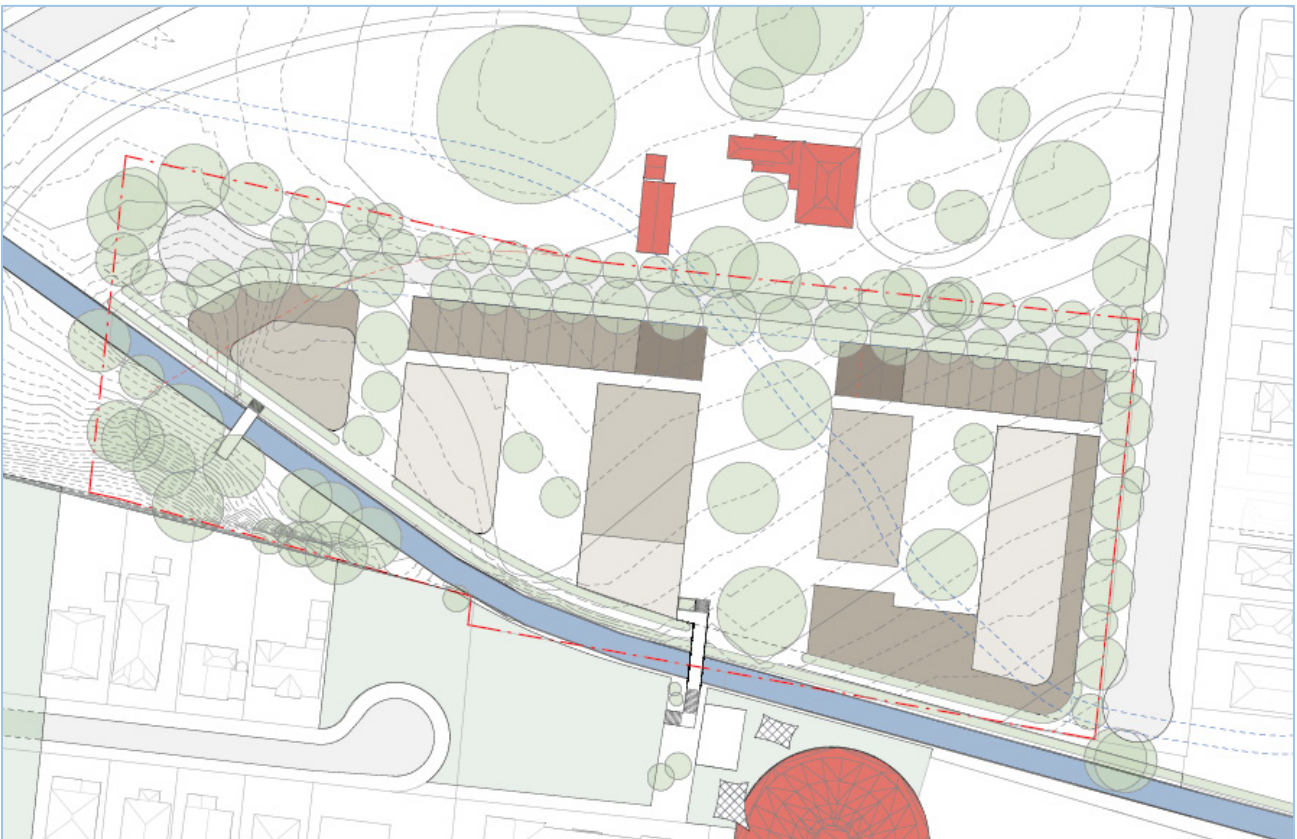


Figure 2: 2025 Concept footprints



Figure 3: 2022 Elevation and massing



Figure 4: 2025 Elevation and Massing

3.2 Quantitative changes

The key quantitative changes between the exhibited concept scheme and the amended project are summarised in Table 2 and can be described as follows.

First, the dwelling yield is reduced from 483 to 320 dwellings, a reduction of 163 dwellings, or roughly one-third of the original yield. The number of affordable dwellings reduces from 242 to 160 but is maintained at 50 per cent of total dwellings, thereby preserving the core inclusionary housing objective within a smaller overall scheme.

Secondly, GFA reduces from 48,685 to 31,073 square metres and the corresponding FSR reduces from 2.5:1 to 1.59:1. This reduction reflects slimmer and shorter building envelopes at sensitive interfaces and a greater proportion of the site being secured as open space and landscape, including deep soil areas.

Thirdly, while the maximum height increases slightly from 27.9 to 29 metres, the height profile across the site is rebalanced. The earlier concept was predominately an eight-storey built form, with more limited stepping down towards the site edges. In the amended scheme, the eight-storey elements are primarily central and southern, with building heights along the northern and western edges reduced to between two and four storeys and a six-storey element set further back from the western boundary.

Fourthly, setbacks to key boundaries are increased. Along Gregory Place, the primary setback increases from 4.6 metres to 6 metres, with upper levels further recessed. Setbacks to Hambledon Cottage increase from 9.5–10 metres to approximately 12 metres, while the separation to Experiment Farm Reserve increases from around 5.1 metres to about 17.5 metres. The distance between Buildings A and B increases from a combination of 18 and 24 metres to 30 metres, creating significantly larger breaks in the built form and wider view and landscape corridors across the site.

Fifthly, the landscape and soil regime improves both in absolute quantity and in quality. Deep soil and soil-capable areas increase from 5,700 to 6,036.4 square metres (from 29.3 to 31 per cent of the site). Within this total, the design report identifies approximately 2,705.2 square metres of deep soil zone, 1,637.7 square metres of additional soil less than six metres wide and 1,693.5 square metres of constructed soil, yielding a total soil-capable area of 6,036.4 square metres. Total open space is confirmed as 12,491.2 square metres (64.1 per cent of site area), including 8,908.7 square metres of publicly accessible open space (45.7 per cent) and 3,582.4 square metres of communal open space (18.4 per cent).

Finally, car parking numbers reduce from 634 to 359 spaces, with residential spaces reducing from 566 to 272 and visitor/retail spaces increasing from 68 to 87. This reduction in parking quantum is accompanied by a stronger emphasis on walking and cycling connections and is supported by the updated transport and accessibility assessment.

Table 2: List of amendment elements

Element	Original concept (EIS)	Amended project	Change / comment
Land use	Residential-led mixed use with no retail	Residential-led mixed use with small ground floor retail / non-residential component	Core use unchanged; minor retail added for activation
Indicative dwellings	483	320	Reduction of 163 dwellings (around one-third)
Affordable dwellings	242	160	Affordable housing retained at 50 per cent of total dwellings
Affordable housing proportion	50%	50%	Proportion unchanged
Total GFA (m²)	48,685	31,073	Reduced by 17,612 m ²
FSR	2.5:1	1.59:1	Significant reduction in intensity
Max height (metres / storeys)	27.9 m / 8 storeys	29 m / 8 storeys	Slight numerical increase; redistributed height away from heritage interfaces
Car parking – total spaces	634	359	Reduced by 275 spaces
Car parking – residential	566	272	Reduced to reflect transit-oriented, BTR / affordable model
Car parking – visitor / retail	68	87	Slight increase to support visitors and small retail component
Publicly accessible open space (m² / % of site)	-	8,908.7 m ² / 45.7%	Increased and consolidated as green spine and channel walk
Communal open space (m² / % of site)	-	3,582.4 m ² / 18.4%	Increased and better distributed across the precinct
Total open space (m² / % of site)	-	12,491.2 m ² / 64.1%	Substantial increase; stronger parkland character
Deep / total soil area (m² / % of site)	5,700 m ² / 29.3%	6,036.4 m ² / 31%	Increase in deep / total soil; improved landscape and tree planting potential
Number of basement levels	2	2	Unchanged; layout refined

3.3 Qualitative changes in built form and landscape

Beyond the numerical changes, the amendments introduce a materially different built form and landscape character. As described in the RTS and updated design report, the revised scheme has been generated through a co-design and evidence-based design process, commencing with the public domain and ground plane, informed by solar access planes, compatibility testing and

Connecting with Country principles, resulting in the development of a new set of design guidelines to guide the subsequent stages.

At the urban design level, the footprints of all buildings have been refined to reduce overall bulk and to create clearer separation between building elements. The large eight-storey form that previously occupied the western edge (Building C) has been replaced by a building that is primarily four storeys, with a six-storey portion set back further within the site and approximately 17 metres from the western boundary and up to 59 metres from Parkes Street. This change, combined with additional stepping in height, reduces the perceived scale of built form when viewed from Experiment Farm Reserve and strengthens the landscape setting along the western interface.

Along Gregory Place, the amended scheme reinforces a more human-scaled streetscape. The front setback is increased to six metres along the length of the frontage, with generous landscaping and large canopy trees proposed to soften the built form and reduce perceived height. Horizontal articulation is used to define the lower levels, reflecting the prevailing form of Gregory Place east, and individual ground-floor entries for apartments are introduced to mimic the finer grain of existing residential frontages and to enhance activation and passive surveillance.

The landscape structure of the precinct is also significantly reworked. The amended scheme creates an integrated parkland framework that includes a heavily landscaped cul-de-sac shared way, a central “community hub” space and a series of linked open spaces along the Clay Cliff Creek stormwater channel. These spaces are designed to form part of a publicly accessible green spine connecting Hambledon Cottage, Experiment Farm Reserve, Our Lady of Lebanon Co-Cathedral and the wider open space network, with varied setbacks along the channel ranging from about six to 45 metres to create a sequence of landscape rooms, vistas and nodal points.

The Clay Cliff Creek channel walk is recast as a key structuring element, with improved pedestrian and cycle connections, interpretive elements that tell the story of the pre-colonial chain of ponds and subsequent colonisation, and biofiltration and planting strategies that enhance ecological function and water quality. The landscape strategy is closely integrated with Aboriginal cultural heritage interpretation and with the updated Statement of Heritage Impact, which emphasise the contribution of landscape to the significance of the Harris Park colonial and parkland setting.

3.4 Qualitative changes in access, movement and public domain

The amendments also reshape the access and movement framework to better align with the heritage context and the surrounding street network. The internal street and shared way structure is simplified and more heavily landscaped, with the Gregory Place cul-de-sac designed as a planted shared zone rather than a conventional vehicle-dominated turning head. New and enhanced pedestrian and cycle connections are provided across and along the channel, improving permeability between Hambledon Cottage, Experiment Farm Reserve, Our Lady of Lebanon Co-Cathedral and nearby neighbourhoods.

The reduced parking provision, combined with improved walking and cycling infrastructure and proximity to high-frequency public transport, supports a mode shift away from private vehicles and reduces traffic generation compared with both the original concept scheme and a continuation or intensification of industrial use on the site. The updated transport and accessibility assessment concludes that, with these changes, the amended proposal will have lower traffic and parking impacts than either the current industrial approval or a new industrial redevelopment.

3.5 Elements of the project that remain unchanged

While the amendments significantly recalibrate the scale, configuration and landscape character of the project, several core elements of the original SSD concept application remain unchanged. The land use intent continues to be a residential-led, build-to-rent and affordable housing precinct, consistent with the Site Compatibility Certificate under the Housing SEPP. The proportion of dwellings to be delivered as affordable housing remains at 50 per cent of the total, and the tenure model continues to emphasise long-term rental housing. Two basement levels are retained, although with a lower parking yield, and the overall structure of internal circulation—focused on a central shared way and connections to Gregory Place and the Clay Cliff Creek stormwater channel corridor—remains broadly consistent with the original concept, albeit more finely tuned and better landscaped.

Overall, the description above demonstrates that the amended project is not a minor or cosmetic adjustment to the exhibited scheme, but a substantial reconfiguration that reduces density, improves setbacks, increases landscape and open space, redistributes height and built form to more appropriate locations on the site, and strengthens heritage, landscape and public domain outcomes, while preserving the core strategic purpose of delivering well-located affordable and build-to-rent housing.

The feasibility work tests a range of potential delivery pathways within this envelope, including long-term build-to-rent operation supported by appropriate financing, but these delivery mechanisms do not alter the nature of the concept approval sought, which remains a residential flat building development with 50 per cent of dwellings to be delivered as affordable housing under the Housing SEPP.

4 Statutory context

This section summarises the statutory planning framework relevant to the amended SSD concept proposal for 2A Gregory Place, Harris Park. It confirms that the legal pathway for assessment and determination is unchanged, explains the position on the consent authority in light of recent changes to the State Environmental Planning Policy (Planning Systems) 2021 (Planning Systems SEPP), and clarifies how the proposal continues to rely on division 5 of chapter 2 of State Environmental Planning Policy (Housing) 2021 (Housing SEPP), the site compatibility certificate (SCC) and clause 4.6 of Parramatta Local Environmental Plan 2011 (Parramatta LEP 2011).

The intention of this section is not to repeat the full statutory analysis provided in the EIS and RTS, but to confirm the continuing operation of the key instruments and to explain how the proposed amendments sit within that framework.

4.1 Overview of the statutory framework

The project continues to be declared and assessed as SSD under the Environmental Planning and Assessment Act 1979 (EP&A Act). The SSD declaration is triggered by the development cost and classification of the build-to-rent affordable housing proposal under Schedule 1 to the Planning Systems SEPP. The concept application is being assessed by the Department of Planning, Housing and Infrastructure (the department) under division 4.7 of the EP&A Act, with this amendment report forming part of the material before the consent authority for the purposes of section 4.15.

The statutory framework for the proposal remains anchored in:

- the Housing SEPP, particularly division 5 of chapter 2 and related savings and transitional provisions;
- the Planning Systems SEPP, including schedule 1 (identifying the development as SSD) and clause 2.7 (consent authority for SSD);
- Parramatta LEP 2011, which continues to apply to the site by reason of the savings provision in clause 1.8A of Parramatta Local Environmental Plan 2023 (Parramatta LEP 2023); and
- clause 11 of State Environmental Planning Policy (Planning Systems) 2021, which confirms that development control plans do not apply to SSD.

The amendments to the concept scheme do not change the operation of any of these instruments. They therefore do not alter the legal permissibility of the development or the SSD pathway that governs its assessment and determination.

4.2 Consent authority and SSD delegations

Under section 4.5(a) of the EP&A Act, the Minister for Planning and Open Spaces (the Minister) is the consent authority for SSD unless an environmental planning instrument declares another person or body to be the consent authority. The Planning Systems SEPP performs this function in relation to SSD. Clause 2.7(1) generally declares the IPC to be the consent authority for SSD where there is substantial community objection or other specified circumstances, subject to savings and exceptions.

The Planning Systems SEPP was amended in October 2025 to insert clause 2.7(7), which provides that, despite clause 2.7(1), the commission is not declared to be the consent authority for specified categories of SSD, including build-to-rent housing identified in Schedule 1, clause 27, where the estimated development cost exceeds the relevant threshold. The Gregory Place proposal falls within this category as a build-to-rent development under the Housing SEPP with an estimated development cost exceeding \$50 million.

In parallel, the project team has obtained joint senior counsel and counsel advice (Lazarus SC and Doyle, 24 November 2025) on the interaction between clause 2.7 of the Planning Systems SEPP and the 2011 instrument by which the Minister delegated broad SSD determination functions to the then Planning Assessment Commission (now the IPC). The advice addresses whether the 2011 delegation continues to allow the commission to determine SSD applications that now fall within the four categories reserved to the Minister by clause 2.7(7).

In summary, the advice concludes that:

- while the position is not free from doubt, the better view is that the 2011 delegation should be taken to have been impliedly repealed or modified to the extent that it would otherwise permit the commission to determine SSD applications within the four categories reserved to the Minister by clause 2.7(7), including build-to-rent development;
- if the 2011 delegation were treated as still authorising the commission to determine those applications, the carefully framed exceptions in clause 2.7(7) would be effectively side-stepped, which would be inconsistent with the purpose of the Planning Systems SEPP amendments and with a rational statutory scheme; and

- in any event, even if the 2011 delegation had some residual operation, it would always remain lawful for the Minister to determine a delegated matter personally under section 49(9) of the Interpretation Act 1987, whereas a purported determination by the commission in the face of clause 2.7(7) would carry a material risk of being ultra vires and vulnerable to third party judicial review.

Applying that advice to the Gregory Place SSD, the practical consequences are that:

- the Minister is, and remains, the consent authority for this SSD application by force of section 4.5(a) of the EP&A Act and clause 2.7(7)(b) of the Planning Systems SEPP;
- the department is properly assessing the amended proposal for determination by the Minister (or an authorised departmental delegate acting in the Minister's stead within the scope of a valid delegation that does not conflict with the Planning Systems SEPP); and
- any attempt to treat the commission as consent authority for this build-to-rent SSD would create an avoidable risk that the resulting determination could be challenged as invalid, with consequential delay and uncertainty for the delivery of the affordable housing project.

This amendment report proceeds on the basis that the Minister is the consent authority for the application and that the department's assessment and recommendation will be provided to the Minister or delegate for final determination.

4.3 Housing SEPP division 5 and the site compatibility certificate

The development continues to rely on division 5 of chapter 2 of the Housing SEPP, which permits a development application to be made for a residential flat building for affordable housing on land for which a site compatibility certificate (SCC) has been issued. The concept SSD application is being assessed under that division for an affordable housing build-to-rent proposal intended to be carried out by or on behalf of a registered community housing provider.

The SCC for 2A Gregory Place was originally issued on 19 July 2017 under division 5 of the former State Environmental Planning Policy (Affordable Rental Housing) 2009 and is preserved by the savings and transitional provisions in Schedule 7A of the Housing SEPP. The Housing SEPP provides that a certificate issued before the lodgement of a development application continues to have legal effect until that application is finally determined. The SCC therefore remains valid and operative for the purposes of determining the current SSD application, notwithstanding the passage of time since its issue.

Consistent with earlier joint senior counsel and counsel advice obtained by the applicant and provided to the Department, the SCC does not of itself grant development consent or override local development standards. Rather, it confirms the strategic suitability of the land for an affordable housing development of the type described and requires the consent authority to give at least significant weight to the Planning Secretary's opinion of compatibility when determining the application, while still undertaking an independent assessment under section 4.15 of the EP&A Act. Within that framework, local development standards (including height and floor space ratio) must be applied in a way that does not frustrate the proper operation of division 5 and the SCC, and any necessary variations must be considered through clause 4.6 of the applicable local environmental plan.

The joint senior counsel and counsel advice confirms that, while the consent authority must undertake its own assessment under section 4.15 of the EP&A Act, it is expected to give at least significant weight to the Planning Secretary's certified opinion of compatibility when determining the application, and to apply local development standards in a manner that does not frustrate the proper operation of division 5 and the SCC.

The amendments to the concept scheme do not alter the form of development authorised by the SCC. The proposal remains a residential flat building development with a substantial affordable housing component on land for which an SCC has been issued and continues to require assessment of compatibility having regard to bulk, scale, environmental impacts, infrastructure capacity and surrounding land uses, as contemplated by division 5.

For the avoidance of doubt, this amendment application does not constitute a new development application for the purposes of division 5 of the Housing SEPP or the SCC. The SSD application was 'made' when it was originally lodged and accepted as valid, and that making date is not altered by the later submission of amended plans or an amendment report. While the department's systems will record a later 'lodgement date' for this amendment package, the SCC continues in force until the original SSD application is finally determined, in accordance with the Housing SEPP savings and transitional provisions and the earlier joint senior counsel and counsel advice.

4.4 Local environmental plans and clause 4.6 variation

As set out in the RTS, the application continues to be assessed against Parramatta LEP 2011, rather than Parramatta LEP 2023, by reason of the savings provision in clause 1.8A of the latter plan. Parramatta LEP 2011 therefore remains the principal local environmental planning instrument applying to the site, including in relation to:

- clause 4.3 Height of buildings; and
- clause 4.4 Floor space ratio.

The amended scheme, like the original concept, does not comply numerically with the mapped 9.2 metre height standard in clause 4.3 and therefore relies on a clause 4.6 written request seeking a variation to that standard. A revised clause 4.6 request has been prepared to correct the percentage variation calculations and to explain why strict compliance with the numeric height standard is unreasonable or unnecessary in the circumstances of this site, and on what environmental planning grounds the variation is justified.

The joint counsel advice obtained for the project and the separate division 5 advice confirm that, in the division 5 context, a residential flat building described in an SCC may lawfully be approved notwithstanding non-compliance with local development standards, provided an appropriate clause 4.6 request is made and the consent authority is satisfied of the matters in clause 4.6(3). In such cases, any conflicting local provision must be read down so as not to frustrate the operation of the Housing SEPP. In this context, the clause 4.6 written request and the division 5 framework are properly understood as facilitating a form and scale of development that is both compatible with the site's heritage and environmental constraints and capable of delivering the affordable housing outcome tested in the feasibility work, rather than as mechanisms to maximise yield irrespective of impact or deliverability.

The amendments to the concept scheme do not introduce any new non-compliance with Parramatta LEP 2011. On the contrary, they reduce overall floor space ratio, increase setbacks,

redistribute height away from the most sensitive heritage interfaces and increase deep soil and landscape provision across the site. Those changes strengthen, rather than weaken, the environmental planning grounds and public interest case underpinning the clause 4.6 variation, particularly in relation to heritage protection, landscape quality, solar access and affordable housing delivery.

4.5 Development control plans and non-statutory guidelines

Clause 11 of the Planning Systems SEPP provides that development control plans do not apply to SSD. Accordingly, Parramatta Development Control Plan 2011 and any subsequent or draft updates do not impose binding development standards on this SSD application.

Nonetheless, the design process has had regard to relevant council controls and guidance where appropriate, particularly in relation to streetscape character, setbacks, building separation, solar access, engineering and flooding considerations and landscape treatment. These matters have been resolved through an iterative, expert-led design process and are addressed through the design guidelines, Statement of Heritage Impact, Visual Impact Assessment, landscape strategy and other technical reports, rather than strict adherence to development control plan provisions.

Other non-statutory guidelines, including the former Director-General's SCC guideline and departmental guidance on division 5 assessments, continue to inform the evaluation of compatibility and the weight to be given to the SCC and the Housing SEPP. The amendments are consistent with that guidance, in that they reflect detailed design testing, further engagement with the department and agencies, and a progressive refinement of the scheme to better address heritage, landscape, transport and environmental considerations.

4.6 Implications of the amendments for statutory assessment

In summary, the amendments to the concept scheme do not change the statutory planning pathway for the proposal. The SSD declaration, Housing SEPP division 5 framework, SCC, applicable local environmental plan, clause 4.6 variation mechanism, non-application of development control plans and relevant non-statutory guidelines all remain as previously described in the EIS and RTS.

The key implications of the amendments, and the updated legal advice, for statutory assessment are as follows.

- First, the Minister is the consent authority for this build-to-rent SSD by operation of the EP&A Act and clause 2.7(7)(b) of the Planning Systems SEPP. The joint senior counsel and counsel advice also notes that any attempt to treat the Independent Planning Commission as consent authority for this build-to-rent SSD, contrary to clause 2.7(7), would create a material risk of legal error and third party judicial review, with consequent delay and uncertainty for delivery of the affordable housing outcome. The 2011 delegation to the commission should not be treated as authorising the commission to determine this application, and any attempt to do so would create an unnecessary risk of legal error and third party judicial review.
- Secondly, the SCC continues to operate as the gateway instrument confirming the site's suitability for affordable housing under division 5 of the Housing SEPP. The amended scheme remains within the scope of development contemplated by the SCC and continues to require a compatibility assessment that gives significant weight to the Planning Secretary's certified opinion while still applying the section 4.15 evaluation framework.

- Thirdly, while a substantial variation to the local height standard under Parramatta LEP 2011 is still sought, the amended scheme strengthens the environmental planning grounds and public interest case for that variation, particularly in relation to heritage, landscape, solar access and the delivery of 50 per cent affordable housing.
- Fourthly, because development control plans do not apply to SSD, the assessment remains focused on performance against State and local environmental planning instruments and on the detailed expert evidence that underpins the amended design, rather than on prescriptive local controls.

Taken together, these matters confirm that the amendments can be considered and determined within the same robust statutory framework as the original SSD concept proposal, and that the revised scheme offers an improved and more compatible outcome while maintaining the core objectives of delivering well-located, high-quality affordable and build-to-rent housing.

5 Community engagement

This section summarises the community and stakeholder engagement undertaken for the project and explains how that engagement has informed the amended concept scheme. It does not repeat the full engagement chronology and submissions analysis contained in the EIS, RTS, the updated Community and Stakeholder Engagement report and updated social impact assessment. Rather, it highlights the key stages of engagement and the way issues raised have shaped the amendments described in section 3 of this amendment report.

The project has been the subject of an extended period of engagement with the department, the council, state agencies, Aboriginal knowledge holders, local stakeholders and the broader community. Engagement commenced prior to the EIS lodgement, followed by the formal public exhibition of the original SSD concept application and EIS in 2022 and has continued through post-exhibition meetings, design review, heritage-focused consultation and preparation of the updated technical studies that support this amendment report.

The statutory exhibition period for the original SSD concept application provided the primary opportunity for public submissions. During that exhibition, the department, the council, state agencies, community organisations and individual residents lodged submissions commenting on the proposal. The main themes raised included concern about the scale and bulk of the proposed buildings in the Harris Park colonial precinct, potential impacts on the setting and views of Hambledon Cottage and Experiment Farm, overshadowing and visual impacts, traffic and parking effects on the surrounding road network, the extent and quality of open space and landscaping, and the way the proposal engaged with Country and Aboriginal cultural values.

Following exhibition, the applicant and project team participated in a series of meetings and workshops with officers of the department and the council to discuss the issues raised in submissions, clarify technical matters and explore the scope for amendments to improve the proposal. These interactions focused on heritage curtilages and view corridors, the distribution of height and massing across the site, deep soil and landscape opportunities along the Clay Cliff Creek stormwater channel, integration with the surrounding open space network and the quantum and mix of affordable and build-to-rent housing. Feedback from the department, heritage council and the council reinforced the need for a more substantial recalibration of the concept scheme rather than minor or incremental changes.

Heritage-specific engagement has been a particular focus in the period leading to this amendment report. Forward Thinking, as the community engagement and social impact consultant to the project, has led a structured program of discussions with the Heritage Council of NSW (through Heritage NSW), the National Trust of Australia (NSW), Parramatta and District Historical Society, Museums of History NSW and the department to test and refine the amended scheme. This included a formal presentation to the Heritage Council Approvals Committee on 30 September 2025, where the applicant and Forward Thinking presented the draft RTS and amended concept design. The Approvals Committee resolved to note the RTS, acknowledge that the current scheme responds to concerns previously raised, support the material reduction in massing and scale (including the reduction from approximately 483 to 320 dwellings), support the Connecting with Country and landscape design, support the proposed minimum 30 metre wide public park and visual connection between Hambledon Cottage and Our Lady of Lebanon Co-Cathedral, and support the reduction in Building C's footprint and height together with a maximum of two storeys for buildings in the immediate vicinity of Hambledon Cottage.

The resolution of the Approvals Committee confirms that the amended concept scheme has reduced potential impacts on the context, setting and visual connections between Hambledon Cottage, Experiment Farm Cottage and Our Lady of Lebanon Co-Cathedral, and that the heritage, landscape and Connecting with Country directions are supported in principle by the Heritage Council's delegate. Engagement with the National Trust and further discussions with the department have reinforced these themes and have provided additional feedback on view corridors, breaking up visual mass on key elevations, ongoing design excellence and the need to ensure that the landscape and Connecting with Country strategies inform the wider public domain beyond the immediate project boundary.

The design has also been informed by independent expert review processes, including urban design review and specialist heritage and landscape advice, which have operated alongside the formal Heritage Council and National Trust engagement. These processes consistently emphasised the importance of reducing overall bulk, stepping and redistributing height away from Hambledon Cottage and Experiment Farm, creating a stronger and more legible parkland framework, improving solar access to key spaces and refining building articulation and materials so that the proposal sits more comfortably within the colonial and parkland setting. Recommendations from these reviews have been incorporated into the amended concept scheme and associated design guidelines.

Targeted engagement was undertaken with Aboriginal knowledge holders and cultural advisers in the development of the Connecting with Country framework and the updated landscape and interpretation strategy. That process highlighted the significance of the pre-colonial landscape, the Clay Cliff Creek corridor and the broader riverine environment, as well as the need to tell a more complete story of Country and colonisation through the design of open spaces, planting, water, paths and interpretive elements. The amended landscape and public domain scheme responds by strengthening the role of the creek corridor, expanding and connecting green spaces, and embedding cultural narratives and interpretation within the public realm.

In parallel, the applicant has engaged with local stakeholders, including representatives of nearby institutions and community organisations, to explain the evolving proposal, listen to concerns and test the revised design response. These discussions have reinforced the importance of maintaining and enhancing public access and view connections, ensuring that traffic and parking impacts are carefully managed, and delivering a precinct that feels open, green and welcoming while still providing much-needed affordable and long-term rental housing.

The RTS and updated social impact assessment document the engagement in detail and provide a structured analysis of submissions and stakeholder feedback. They also identify the specific ways in which that feedback has informed the amended project, including the reduction in dwelling yield and gross floor area, the redistribution and stepping of height away from heritage interfaces, the substantial increase in open space and deep soil, the reconfiguration of the Clay Cliff Creek stormwater channel walk and associated parkland, and refinements to the dwelling mix and apartment layouts within the established build-to-rent and affordable housing framework to support strong social outcomes and long-term management.

Overall, the engagement process has been iterative and responsive. The amendments presented in this report are not a cosmetic adjustment to the original scheme but the outcome of sustained dialogue with the department, the council, the Heritage Council of NSW, the National Trust (NSW), Parramatta and District Historical Society, Museums of History NSW, Aboriginal knowledge holders and the community, led by Forward Thinking. The resulting concept scheme offers a markedly improved balance between delivering well-located affordable and build-to-rent housing and protecting and enhancing the heritage, landscape and amenity values of the Harris Park colonial precinct.

6 Assessment of impacts

The amended concept has been developed in response to submissions, updated technical work and the department's request for information. It has three main consequences that need to be assessed in an integrated way.

- First, the built form and landscape response to the Harris Park colonial heritage precinct has been substantially refined, with reduced height and bulk and increased setbacks and open space.
- Second, the total number of dwellings has been reduced from 483 to 320, with a corresponding reduction in the number of affordable dwellings compared with the original SCC 2017 concept.
- Third, the feasibility work for the amended scheme has tested a range of delivery pathways within the same planning envelope, including long-term build-to-rent operation supported by appropriate financing and, where necessary, complementary delivery mechanisms, in response to current construction and interest-rate conditions.

In doing so, this section does not seek to repeat the full, issue-by-issue analysis already provided in the original EIS and the 2025 RTS. Those documents remain the primary source for detailed assessment of individual topics such as overshadowing, wind, noise, contamination, archaeology and construction impacts. The focus here is on the way in which the amended concept scheme changes the impact profile relative to the exhibited 2022 concept and the existing industrial use, drawing together the conclusions of the updated technical reports.

This section assesses the net impacts of the amended concept, drawing on the updated design report, visual impact assessment, statements of heritage impact, social impact assessment and economic impact assessment.

6.1 Built form, heritage and landscape

The updated Statement of Heritage Impact prepared by GBA Heritage concludes that the refined concept provides an improved heritage outcome compared with both the current industrial use and the 2022 concept scheme. It identifies the following key heritage benefits of the amended design. The removal of the redundant factory building and hardstand allows the southern setting of Hambledon Cottage and the broader Harris Park colonial precinct to be re-landscaped, reconnecting Clay Cliff Creek stormwater channel, Hambledon Cottage and the river corridor in a way that is not possible under the status quo.

The concept restructures the site into three sub-precincts – Gregory Place, the community hub and the parkland setting – with built form deliberately modulated to reduce perceived bulk, step down to the heritage items, and reinforce the legibility of the colonial landscape. The consolidated design guidelines prepared by Tzannes and the updated visual impact assessment show that tower footprints are slimmer, overall building height is reduced from the earlier SCC 2017 and 2022 schemes, and setbacks to the north and south have been significantly increased. This allows a continuous open-space and view corridor to run along the southern edge of Hambledon Cottage and towards the Parramatta River, improving the “visual absorption capacity” of the site and reducing the apparent scale of the towers when viewed from the cottages and the Clay Cliff Creek escarpment.

The updated design also embeds connecting-with-Country principles, drawing on the Aboriginal Cultural Heritage Assessment and Yerrabingin’s Connecting with Country framework. The creek corridor, tree canopy, path network and interpretive elements are structured to acknowledge pre-colonial occupation and use of the land, not only the later colonial narrative. This is a qualitative but important shift in the way the place will be understood and experienced.

Those improvements, however, do not erase the fact that the development remains a large, high-density scheme in a sensitive colonial context. The National Trust and Parramatta and District Historical Society have consistently argued that any tower-scale development south of Hambledon Cottage is fundamentally incompatible with its “parkland” setting and the triad of Experiment Farm, Elizabeth Farm and Hambledon Cottage. Their submissions stress that even with improved setbacks and landscape, the introduction of 320 dwellings and multiple towers will have a strong visual presence and change the character of views across the precinct.

The updated visual impact assessment and the heritage analysis do not dispute that the development will be visible. Rather, they contend that visibility is managed through increased separation, landscaping and a legible contrast between old and new that is consistent with the Burra Charter and the NSW Heritage Manual. The Heritage Council’s recent consideration of the scheme acknowledges these design refinements and the enhanced landscape framework and does not recommend refusal on heritage grounds, while still emphasising the need for careful implementation of the design guidelines and interpretive strategy.

The RTS and updated technical work also confirm that these built form changes translate into measurable improvements in overshadowing and visual impact outcomes when compared with the 2022 concept. Mid-winter solar access to the grounds of Hambledon Cottage, Experiment Farm Reserve and key public and communal open spaces is improved, with longer periods of direct sun and reduced overshadowing from upper levels. View analysis in the visual impact assessment shows that the slimmer building footprints and increased separation between building elements

reduce the apparent width of towers in key public views, and that no new built form is introduced directly behind Hambledon Cottage in its most significant view corridors. At the same time, it is acknowledged that the development will remain a prominent element in many views and that the perception of change will be significant for some observers, particularly those who favour a lower-scale or wholly open parkland outcome.

On balance, the built form and heritage impacts of the amended concept can be characterised as follows: The change from industrial use to a mixed-use residential and open-space precinct delivers a substantial qualitative improvement in the setting, accessibility and interpretation of Hambledon Cottage, the surrounding colonial landscape and introduces for the first time in the precinct, the pre-colonial narrative. The updated design meaningfully reduces bulk, increases setbacks and deep soil, and introduces a coherent open-space and view structure that responds to earlier heritage criticism rather than ignoring it.

At the same time, residual visual and character impacts remain high when judged against a hypothetical “no development” or low-scale benchmark. The decision to maintain a high-density housing program on the site means that the cottages will still read against a backdrop of contemporary but suitably formed buildings rather than unbuilt parkland. The amended concept therefore improves compatibility compared with the current industrial context, the SCC 2017 and 2022 schemes, but it cannot be described as impact-free in heritage terms.

6.2 Social and economic impacts, including affordable housing

The updated social impact assessment by Forward Thinking confirms that the Gregory Place site is a highly suitable location for higher-density housing and affordable housing, given its proximity to public transport, health and education facilities, jobs in Parramatta CBD and the Westmead Health and Innovation Precinct, and a wide range of community and recreational facilities. It finds that the location and dwelling mix enable intergenerational living, ageing in place and improved access to services for lower-income and key-worker households that are currently being pushed to the urban fringe.

The economic report for the project demonstrates that rental vacancy rates in Parramatta and Harris Park are at or below 2 per cent and are expected to remain at this level for the foreseeable future – well below what is considered a balanced market. At the time of analysis, only 103 rental properties were available in the local market, underscoring the scarcity of well-located rental housing near jobs and transport. Against this background, the current proposal for 320 apartments, of which 160 are affordable rentals at 80 per cent of market rent for at least 15 years, represents a very substantial intervention in local housing supply.

The economic analysis estimates that the discounted rental benefit of the affordable component alone is approximately \$13.9 million over 15 years, with a further \$5.8 million in commuter savings because key workers are able to live closer to their jobs. The combined net present value of these benefits to tenants is around \$19.7 million over the 15-year period, not including broader productivity gains.

The SIA adds a qualitative layer to this, identifying positive social impacts in terms of housing security, social mix, access to schools, faith-based institutions and community facilities, and the ability for culturally and linguistically diverse communities to stay connected to existing social networks. It also recognises legitimate community anxiety about density, parking, safety and change, but finds that fears about crime associated with affordable housing are not supported by

empirical evidence; rather, outcomes are shaped by design and management quality, both of which are strong in this proposal.

Set against these significant social and economic benefits is an unavoidable negative: the amended concept delivers fewer total dwellings and fewer affordable dwellings than the original 483-unit scheme that underpinned the 2017 site compatibility certificate. In that earlier concept, up to 242 dwellings were modelled as affordable rentals within a 100 per cent build-to-rent framework. The current 320-unit concept secures 160 affordable dwellings. In other words, heritage-driven and cost-driven refinements have reduced the potential affordable housing yield by around one-third compared with the original vision.

The economic report is explicit that this outcome is not a function of a reduced commitment to affordable housing by the proponent. It is a product of a changed macro-economic environment (doubling of interest rates, escalation in construction costs) and the cumulative effect of design refinements that have reduced gross floor area and market yield. It notes that if the original 483-unit scheme had been delivered when first proposed, it would have been significantly more feasible and could have delivered a larger number of affordable dwellings. It notes that, had an earlier, higher-yield scheme been able to proceed under 2017 cost and finance settings, a materially greater number of affordable dwellings could reasonably have been delivered than is possible under current conditions.

In that sense, the amended concept represents a compromise rather than an optimisation from a social-need perspective. It still delivers a very material affordable housing yield and clear social benefits, but not as many households will be assisted as might have been possible under the original envelope.

6.3 Viability, deliverability and economic risk

The same economic report shows how the amended concept can be delivered in current market conditions and compares this with alternative residential and industrial scenarios. Testing of five feasibility scenarios demonstrates that a higher-yield, 100 per cent build-to-rent configuration would be significantly more difficult to deliver at today's construction and finance costs than under the 2017 settings. The updated analysis therefore focuses on delivery pathways for the amended 320-dwelling scheme that retain the core affordable and rental housing objectives while responding to current market conditions.

The report identifies residential delivery pathways in which a proportion of dwellings is sold upfront, with the balance retained as long-term rental stock, including affordable rental dwellings, supported by prudent levels of debt and ongoing rental income. In each case, the development remains commercially feasible on the assumptions adopted, while continuing to deliver the 50 per cent affordable housing outcome.

For comparison, the report also notes that an industrial park consistent with the underlying zoning is a feasible alternative use, with different risk and return characteristics and a lower overall contribution to housing and affordable housing outcomes.

The implication for impact assessment is that the amended concept is commercially feasible but with tight feasibility margins. Any substantial further reduction in yield, increase in design or mitigation costs or increase in affordable housing obligations would, depending on their scale and timing, require the feasibility of the proposal and the appropriate delivery pathway to be

reconsidered, including relative to the industrial redevelopment option. If that were to occur, the social and economic benefits identified above – including the quantified tenant and commuter benefits, construction employment and the ongoing contribution to housing supply – may not be realised in the form currently proposed.

6.4 Transport, traffic and access

The transport and accessibility impact assessment confirms that the reduction from 483 to 320 dwellings and from 634 to 359 parking spaces significantly lowers traffic generation and parking demand relative to the 2022 concept. The updated scheme is expected to generate approximately 61 vehicle trips in the AM peak hour and 48 in the PM peak, with around 502 vehicle movements per weekday. These volumes are low to moderate in the context of a transit-served inner-urban location and are not expected to materially degrade the performance of the surrounding network, particularly given direct access to James Ruse Drive and the ability to avoid more constrained local streets.

The modal split assumptions show a strong bias towards sustainable transport, with an estimated 55 per cent of trips by public transport, 10 per cent by walking or cycling and 35 per cent by private car. A total of 353 bicycle parking spaces and improved pedestrian links to bus and rail infrastructure support this mode share.

SCT Consulting has also specifically considered interactions with Our Lady of Lebanon Co-Cathedral and the Maronite College of the Holy Family, concluding that development-related peaks do not coincide with school pick-up and drop-off and that traffic volumes can be accommodated without unacceptable safety or congestion impacts for these sensitive uses.

6.5 Environmental performance and risk

The suite of updated technical reports – ESD, flood, wind, acoustic, contamination, integrated water management and arboriculture – demonstrate that the amended concept either maintains or improves environmental performance relative to the 2022 scheme. The reduction in gross floor area reduces overall energy demand and embodied emissions; updated ESD measures and building services improve operational efficiency; and the increase in deep soil and landscaping supports urban heat mitigation and biodiversity outcomes along Clay Cliff Creek stormwater channel.

In terms of residential amenity, the amended envelopes have been tested in the updated design report and RTS against solar access and cross-ventilation benchmarks. The reductions in height and bulk at the northern and western edges, together with the increased separation between buildings, improve daylight access to apartments and to communal open spaces compared with the 2022 concept, while maintaining acceptable privacy and outlook relationships. The environmental wind study confirms that the refined tower forms and landscape elements avoid uncomfortable wind conditions in primary entry, circulation and open space areas, with any localised exceedances capable of being addressed through detailed design. Updated acoustic assessment work confirms that traffic noise impacts can be mitigated by standard façade treatments and mechanical design, and that operational noise from plant and communal areas can be managed through design and conditions. Contamination, Aboriginal cultural heritage and historical archaeology are each addressed through updated specialist reports and management plans, which confirm that the amended works can be undertaken in a staged and controlled manner consistent with regulatory requirements and best practice.

Flood assessment and the flood emergency response plan confirm that building levels, access routes and evacuation procedures are compatible with current flood risk, and that the development can be safely evacuated in accordance with Parramatta’s floodplain risk management framework. Construction noise, vibration and contamination risks are managed through standard mitigation measures and regulatory frameworks, without introducing novel or unmanageable impacts.

Overall, the environmental impacts of the amended concept are acceptable and, in several respects, improved when compared with the prior concept, particularly regarding open space, landscaping, deep soil and riparian corridor protection.

6.6 Residual impact profile

In summary, the amended concept:

- reduces built form impacts and improves the heritage, landscape and public domain response compared with the SCC 2017 and EIS 2022 concept schemes, while still imposing a high but manageable level of change in a sensitive heritage context,
- continues to deliver substantial social and economic benefits through affordable housing and mixed-tenure supply, but at a lower quantum than originally envisaged in 2017,
- is supported by current feasibility analysis, noting that feasibility margins are tight and that material further yield reductions or additional obligations could not be accommodated without careful reconsideration of project feasibility and the realistic prospect of an industrial redevelopment scenario under the existing zoning.

7 Justification of the amended project

The guideline for amendment reports requires an explanation of why the amended project remains justified in light of its impacts and why the revised outcome is preferred to both the previously exhibited concept and the reasonable alternatives.

7.1 Consistency with housing and affordable housing need

The need for additional housing and, in particular, affordable rental housing in Parramatta is acute and well-documented. The economic report and the RTS analysis show that council has not been approving sufficient dwellings to meet its strategic targets and that rental vacancies at or below 2 per cent indicate a structurally undersupplied market.

Within this context, the amended concept still delivers a significant net public benefit by providing 320 new apartments, with 160 secured as affordable rental dwellings at 80 per cent of market rent for at least 15 years. The associated rental and commuter benefits to tenants, with an estimated net present value approaching \$20 million over the control period, are material in both social and economic terms.

From a housing-need perspective, the amended scheme is therefore clearly preferable to the no-development scenario or an industrial-only redevelopment, both of which would deliver no additional dwellings and no affordable housing.

7.2 Balancing heritage outcomes and housing delivery

The key policy and community question is whether it is appropriate to accept a reduction in dwelling and affordable housing yield in order to secure a significantly improved heritage and landscape outcome, and whether the amended scheme strikes a reasonable balance.

The updated heritage, design and visual impact evidence indicates that the refined scheme does substantially better in heritage terms than its predecessors. It reduces bulk and height, increases setbacks, recesses taller elements further from Hambledon Cottage and Experiment Farm, and delivers 16,343 square metres of landscaped area integrated with the Clay Cliff Creek stormwater channel corridor and the broader colonial precinct. These changes respond directly to the concerns raised by the National Trust, the Parramatta and District Historical Society, Museums of History NSW, the Heritage Council and community submitters about the earlier concepts. The Heritage Council's more recent advice recognises these improvements and does not recommend refusal on heritage grounds.

At the same time, the project team accepts that the amended scheme still imposes visual and character change on the heritage landscape and that some stakeholders remain opposed in principle to any tower-scale development in this location. Those views are respected and have informed the design evolution. The amended scheme cannot return the site to a pre-industrial or low-rise condition; rather, it seeks to embed a contemporary, high-density housing outcome within a heritage-sensitive landscape framework that maximises public accessibility and interpretation while limiting built form to what is necessary to make the project deliverable.

On this view, the loss of some affordable housing yield relative to the original SCC 2017 concept is the compromise of achieving a more compatible, approvable and fundable outcome that still delivers substantial social and economic benefits.

7.3 Viability, alternatives and risk of non-delivery

A critical element of the justification is deliverability. The economic analysis indicates that the higher-yield, 483-unit, 100 per cent build-to-rent configuration was more closely aligned with the cost and finance conditions that applied at the time the SCC was issued, and that delivering that configuration in the current environment would be significantly more challenging. The updated feasibility work therefore focuses on residential delivery pathways for the amended 320-unit scheme that are better suited to present conditions while retaining the project's core inclusionary housing objectives.

The analysis concludes that the amended 320-unit scheme with 160 affordable dwellings can be delivered on reasonable assumptions, including scenarios in which a proportion of dwellings is sold upfront and the balance is retained as long-term rental stock, including affordable rental dwellings. It also identifies a more conventional pathway in which a larger proportion of dwellings is sold and a smaller proportion is retained as affordable build-to-rent stock. In each case, the project remains commercially feasible on the assumptions adopted in the modelling, but feasibility margins are tight.

The report also notes that a conventional industrial park on the site is a feasible alternative development path with different risk and return characteristics. From a public interest perspective, this underscores the importance of an orderly and timely determination of a scheme that delivers

affordable and build-to-rent housing, rather than a prolonged period of uncertainty that could lead to the continuation or intensification of industrial use.

In this context, insisting on significant further changes to built form or affordable housing obligations beyond the envelope tested in the feasibility work could, depending on their scale and timing, affect the attractiveness of the residential and affordable housing outcome relative to an industrial redevelopment. That is not presented as a threat, but as a realistic statement of the choices available under the current zoning and market conditions and of the limited scope to further compromise the project without placing delivery at risk.

7.4 Overall planning merit and public interest

When assessed as a whole, the amended project:

- delivers a large, well-located supply of mixed-tenure and affordable housing in a local government area facing an acute housing and rental crisis
- implements a significantly improved, evidence-based heritage and landscape response that better respects the Harris Park colonial precinct, while acknowledging that residual impacts remain
- achieves an acceptable environmental performance, with improved open-space, landscaping and flood and ESD outcomes compared with the earlier concept
- is supported by current feasibility analysis as commercially viable in the present macro-economic environment, noting that feasibility margins are tight and that any material further down-scaling or additional obligations could not be imposed without careful consideration of their implications for overall project feasibility.

On this basis, the amended concept is considered to have positive net planning merit and to be in the public interest when judged against the objectives of the Environmental Planning and Assessment Act, the Housing SEPP and the State's housing and affordability policy framework. It is not an ideal outcome in absolute terms – particularly when set against the original aspiration for a larger number of affordable dwellings – but in the current heritage, market and policy context it represents a reasonable and deliverable compromise that secures substantial social, economic and heritage benefits that would not otherwise be realised.