

Response to submission report 2A Gregory Place, Harris Park, NSW, 2150



Submitted to Department of Planning, Housing and Infrastructure
August 2025

Contents

1	Introduction	1-1
1.1	Background.....	1-2
1.2	updated project narrative	1-4
1.3	Structure of submissions report	1-5
1.4	Attachments	1-6
2	Need for housing and affordable housing	2-8
2.1	The need for housing in Parramatta	2-8
2.1.1	Housing stock.....	2-8
2.1.2	Housing demand.....	2-9
2.1.3	Housing approvals	2-9
2.1.4	Parramatta’s housing target and performance against target.....	2-10
2.1.5	Balance of supply and demand – Forecast deficit	2-11
2.2	The changing need for affordable housing	2-13
2.3	The need to increase housing in Parramatta	2-13
2.4	Conclusion	2-14
3	Assessing compatibility in the context of contemporary housing need	3-14
3.1	Legal and policy framework	3-14
3.1.1	Division 5 statutory framework, guidance, and legal interpretation	3-14
3.1.2	A person-centred outcome	3-16
3.2	Compatibility and sustainability assessment	3-16
3.3	Introduction to the compatibility matrix assessment model.....	3-17
3.4	Social compatibility: Context and method of assessment.....	3-19
3.4.1	Methodology for social compatibility assessment	3-20
3.4.2	Social compatibility themes and testing framework.....	3-20
3.4.3	Social theme identification	3-20
3.4.4	Social theme compatibility analysis	3-23
3.4.5	Conclusion: Social compatibility and sustainability.....	3-32
3.5	Economic compatibility.....	3-33
3.5.1	Economic theme identification.....	3-34
3.5.2	Economic theme compatibility analysis	3-37
3.5.3	Conclusion: Economic compatibility and sustainability	3-43
3.6	Environmental compatibility assessment.....	3-43
3.6.1	Contextual transformation and baseline environmental compatibility	3-45
3.6.2	Environmental theme identification	3-47
3.6.3	Environmental theme compatibility analysis	3-58

3.6.4	Conclusion: environmental compatibility and sustainability	3-109
3.7	Final compatibility assessment and conclusion	3-111
4	Analysis of submissions	4-113
4.1	Register of submissions	4-114
4.2	Summary of Issues Raised	4-117
5	Summary of changes	5-123
5.1	Details of key changes to 2022 scheme.....	5-127
5.1.1	Connecting with Country	5-127
5.1.2	Overall building heights	5-128
5.1.3	Southern boundary interface	5-129
5.1.4	Northern boundary interface	5-130
5.1.5	Building C – Western interface	5-130
5.1.6	Building A – Gregory Place interface	5-131
5.1.7	Clay Cliff stormwater channel walk.....	5-132
6	Engagement	6-134
6.1	Engagement background	6-134
6.2	2022 engagement: pre-EIS lodgement methodology and key findings	6-134
6.3	Updated concept plan engagement: methodology and key findings	6-136
6.4	Department of Planning and Environment (now DPHI)	6-140
6.5	State design review panel	6-141
6.6	Concluding comments	6-141
7	Response to submissions	7-142
7.1	Consideration of issues raised by the department	7-142
7.2	Consideration of department engaged heritage and urban design review	7-157
7.3	Consideration of SDRP comments/recommendations	7-165
7.4	Consideration of City of Parramatta Council submission	7-174
7.4.1	City of Parramatta Council detailed comments	7-181
7.5	Consideration of submissions from government agencies	7-214
7.5.1	Heritage NSW	7-214
7.5.2	NSW Heritage Council	7-214
7.5.3	Heritage NSW – Aboriginal cultural heritage assessments	7-216
7.5.4	Fire and Rescue NSW	7-217
7.5.5	State Emergency Service.....	7-217
7.5.6	Sydney Water.....	7-219
7.5.7	Department of Planning and Environment Water Assessments.....	7-221
7.5.8	Transport for NSW.....	7-221

7.6	Consideration of key submissions	7-223
7.6.1	The National Trust of Australia (New South Wales) – 1 September 2022	7-223
7.6.2	Parramatta & District Historical Society – 29 August 2022	7-240
7.6.3	The Maronite Catholic Eparchy of Australia, New Zealand and Oceania – 29 August 2022	7-245
8	Response to public submissions	8-256
8.1.1	Theme 1: The proposed buildings are too high	8-256
8.1.2	Theme 2: The proposed buildings are too bulky and of an inappropriate scale	8-257
8.1.3	Theme 3: There is insufficient setback from all boundaries, increasing the heritage impact to Hambledon Cottage and its setting, Experiment Farm and its setting, and to Clay Cliff Creek Channel	8-258
8.1.4	Theme 4: The development will result in too many people in the area, creating safety concerns	8-260
8.1.5	Theme 5: the development will result in too many new cars in the surrounding streets which are already constrained by attendees to OLOLC and the Maronite College of the Holy Family (MCHF)	8-262
8.1.6	Theme 6: The development will result in insufficient parking in the area	8-263
8.1.7	Theme 7: There is too much on site parking within the development	8-264
8.1.8	Theme 8: The proposal is incompatible with its context	8-265
8.1.9	Theme 9: The proposal has a large impact on and is inconsistent with the heritage context and the setting of the three cottages	8-266
8.1.10	Theme 10: Cottage blue sky background is impacted by the proposal	8-266
8.1.11	Theme 11: Heritage trees in the reserve are not adequately considered, nor their connection between cottages	8-267
8.1.12	Theme 12: Aboriginal archaeology is not adequately considered	8-268
8.1.13	Theme 13: The application has not adequately considered the retention of trees on the site	8-269
8.1.14	Theme 14: The proposal does not provide for the interpretation of the significant heritage of the precinct	8-270
8.1.15	Theme 15: The proposal does not consider the views into and out from OLOLC, including the importance of OLOLC on the skyline and the current openness	8-271
8.1.16	Theme 16: The ground plane has not been adequately considered, including the extent of deep soil	8-272
8.1.17	Theme 17: First Nation design principles and integration haven't been adequately considered	8-272
8.1.18	Theme 18: The development does not adequately consider the impacts of flooding on the area and doesn't give consideration to OSD and WSUD requirements and impacts	8-273
8.1.19	Theme 19: The proposed buildings lack appropriate amenity	8-274
8.1.20	Theme 20: The proposal will cause conflict with OLOLC	8-275
8.1.21	Theme 21: The proposal will impact on OLOLC's redevelopment potential	8-276

8.1.22	Theme 22: The location is not appropriate for affordable housing.....	8-277
8.1.23	Theme 23: There is a high vacancy rate of apartments in the area.....	8-280
8.1.24	Theme 24: The consultation process was inadequate	8-281
8.1.25	Theme 25: Concerns were raised in relation to overshadowing; OLOLC, the childcare centre, heritage items, adjoining reserve and the channel walk	8-282
8.1.26	Theme 26: Concerns were raised about the VIA not adequately showing views around and from OLOLC, the cottages and the heritage view corridor	8-283
8.1.27	Theme 27: Concerns relating to construction impacts	8-284
8.1.28	Theme 28: Concerns relating to staging the development.....	8-284
8.1.29	Theme 29: Concerns relating to the proposed development’s noise generation.....	8-285
8.1.30	Theme 30: Concerns have been raised relating to neighbourhood privacy being impacted by the height of the development and number of residences	8-285
8.1.31	Theme 31: Requests that Clay Cliff Creek be correctly located, interpreted, and the current channel remediated and reinstated as a natural water course	8-286
8.1.32	Theme 32: Concerns were raised that demolition would result in the area being exposed to contaminated materials	8-286
8.1.33	Theme 33: Does not comply with Parramatta planning controls	8-287
8.1.34	Theme 34: The clause 4.6 request does not appropriately address the height increase. Percentage increase description to be the percentage of limit not percentage of proposal	8-289
8.1.35	Theme 35: SCC does not confer a height increase	8-289
8.1.36	Theme 36: The SCC is no longer valid	8-290
8.1.37	Theme 37: The site should be in public ownership and converted to a park	8-290
8.1.38	Theme 38: Concerns re-impacts Our Lady Aged Care (OLACC) residents	8-290
8.1.39	Theme 39: The proposal will generate an increased demand for recreation spaces	8-291
8.1.40	Theme 40: The proposal will generate an increased demand for services.....	8-291
8.1.41	Theme 41: The proposal will lead to the destruction of cultural values.....	8-293
8.1.42	Theme 42: The proposal will lead to the destruction of social values	8-293
8.1.43	Theme 43: The proposal will lead to the destruction of ecological values	8-299
8.1.44	Theme 44: No consideration has been given to the proposal’s location within an area of National heritage significance.....	8-300
8.1.45	Theme 45: The development will impact on the cultural and tourism potential of the listed cottages and should elevate the tourism significance	8-300
8.1.46	Theme 46: The removal of existing industrial on the site is supported	8-301
8.1.47	Theme 47: The site is a good location for factories for jobs	8-301
8.1.48	Theme 48: Support of residential use over industrial use	8-302
8.1.49	Theme 49: Alternative development not adequately considered	8-302
8.1.50	Theme 50: Proposal is overdevelopment	8-303
8.1.51	Theme 51: The development is illegal	8-303

8.1.52	Theme 52: Build-to-rent is virtue signalling	8-303
8.1.53	Theme 53: The proposal does not benefit the local community	8-305
9	Conclusion	9-307

List of tables

Table 1	Housing stock – Parramatta SA3	2-8
Table 2	Population – Parramatta SA3	2-9
Table 3	Dwelling approvals, Parramatta local government area	2-9
Table 4	Projected completions compared with housing target	2-10
Table 5	Average annual population growth 2016-2021, Parramatta SA3	2-11
Table 6	Population projection, Parramatta SA3	2-11
Table 7	Average annual growth in housing stock 2016-21, Parramatta SA3	2-12
Table 8	Stock estimates based on linear growth and approvals, Parramatta SA3 and LGA	2-12
Table 9	Projected dwelling surplus/deficit, Parramatta SA3	2-12
Table 10	Register of Submissions	4-114
Table 11	Agencies' and organisations' submissions	4-118
Table 12	Summary of changes	5-126
Table 13	Engagement	6-136
Table 14	Stakeholder engagement	6-138
Table 15	Social impacts analysis and mitigation	8-294

List of figures

Figure 1	Concept Design 2015	1-3
Figure 2	Concept Design 2022	1-4
Figure 3	Concept Design 2025	1-5
Figure 4	Dwelling approvals, Parramatta LGA	2-10
Figure 5	Compatibility Matrix assessment of compatibility model	3-19
Figure 6	Comparison view from north to Hambleton cottage	3-59
Figure 7	Comparison view eastern view	3-61
Figure 8	Publicly accessible Green Spine showing OLOLC beyond	3-63
Figure 9	Design strategies supporting a cohesive balance	3-64
Figure 10	Public realm structure and landscape response to Harris Park subdivision pattern	3-66
Figure 11	Landscape structure plan showing the publicly accessible green spine, heritage buffer, and communal zones	3-67
Figure 12	Character and material palette	3-71
Figure 13	Landscape setting and public domain integration – Gregory Place central spine	3-73
Figure 14	Landscape connectivity and access diagram – pedestrian and cycle linkages	3-74
Figure 15	Existing view from Experiment Farm northeast to the trees of Hambleton Cottage	3-98
Figure 16	2022 Concept footprints	5-125
Figure 17	2025 Concept footprints	5-125
Figure 18	2022 Elevation and massing	5-126
Figure 19	2025 Elevation and Massing	5-126
Figure 20	Interpreting Distinctive Site Attributes	5-128
Figure 21	Refined built form	5-129
Figure 22	Proposed green spine	5-130
Figure 23	Western interface refinement	5-131
Figure 24	Channel walk representation from design report	5-133
Figure 25	Ariel view of south boundary childcare location	7-146

Figure 26 Tree locations	7-147
Figure 27 Tree identification.....	7-148
Figure 28 Temporary access	7-149
Figure 29 Clay Cliff channel set backs	7-187
Figure 30 Community facilities and recreational opportunities.....	8-293
Figure 31 SIA model	8-294
Figure 32 Interface with Hambleton Cottage view to west	8-306
Figure 33 View to south green spine.....	9-308

Appendices

Appendix id.	Report item
Appendix A	Design Report
Appendix B	Submissions Response Register
Appendix C	Amended Clause 4.6 – Building Height
Appendix D	Legal Opinion
Appendix E	Visual Impact Assessment
Appendix F	Accessibility Assessment Report
Appendix G	BCA Assessment Report
Appendix H	updated Environmental Wind Impact Study
Appendix I	updated Ecologically Sustainable Design Report
Appendix J	updated Demolition/Construction & Operational Waste Management Plan
Appendix K	updated Acoustic Assessment
Appendix L	updated Construction Noise and Vibration Management Plan
Appendix M	updated Integrated Water Management Plan
Appendix N	updated Flood Assessment
Appendix O	Flood Emergency Response Plan
Appendix P	updated Statement of Heritage Impact
Appendix Q	Contamination Response
Appendix R	Aboriginal and Historical Archaeological Response to Submissions
Appendix S	updated Aboriginal Cultural Heritage Assessment Report
Appendix T	updated Historical Archaeological Heritage Impact Assessment
Appendix U	Transport and Accessibility Impact Assessment
Appendix V	Preliminary Construction Traffic Management Plan
Appendix W	Green Travel Plan
Appendix X	updated Social Impact Assessment
Appendix Y	updated Community and Stakeholder Engagement Report
Appendix Z	Construction Management Plan
Appendix AA	Draft Plan of Management
Appendix BB	updated Economic Impact Assessment
Appendix CC	updated Cost Report
Appendix DD	Hydrogeological Response Letter
Appendix EE	updated Infrastructure Delivery, Management & Staging Plan
Appendix FF	updated Arboricultural Impact Assessment, Tree Protection and Management Plan
Appendix GG	BDAR Waiver Request

Glossary and abbreviations

Abbreviation	Definition
Abbreviation	Definition
ABS	Australian Bureau of Statistics
ACHA	Aboriginal Cultural Heritage Assessment
ADG	Apartment Design Guide

Abbreviation	Definition
AEP	Annual Exceedance Probability
AHD	Australian Height Datum
AHURI	Australian Housing and Urban Research Institute
AIA	Aboricultural Impact Assessment
AIP	Aquifer Interference Policy
AQF	Australian Qualifications Framework
ARH	Affordable Rental Housing
ARI	Average Recurrence Interval
ARR	Australian Rainfall and Runoff
AS	Australian Standard
BCA	Building Code of Australia
BMS	Building Management Systems
BTR	Build-to-Rent
CALD	Culturally and Linguistically Diverse
CBD	Central Business District
CC	Construction Certificate
CHP	Community Housing Provider
CIV	Capital Investment Value
CMP	Conservation Management Plan
CPTED	Crime Prevention Through Environmental Design
DA	Development Application
DCCEEW	Department of Climate Change, Energy, the Environment and Water
DCP	Development Control Plan
DP	Deposited Plan (land title reference)
DPPIE / DPHI	Department of Planning, Industry and Environment / Department of Planning, Housing and Infrastructure (now DPHI)
DSCA	Dominic Steele Consulting Archaeology
DSI	Detailed Site Investigation
EIS	Environmental Impact Statement
EP&A Act	Environmental Planning and Assessment Act 1979 (NSW)
EPA	Environment Protection Authority
EPD	Environmental Product Declaration
EPI	Environmental Planning Instrument
ESD	Ecologically Sustainable Development
ESS	Environmental Sustainability Strategy
EV	Electric Vehicle
FAQs	Frequently Asked Questions
FERP	Flood Emergency Response Plan
FFL	Finished Floor Level
FOGO	Food Organics and Garden Organics
FRNSW	Fire and Rescue New South Wales
FSR	Floor Space Ratio
FYTD	Financial Year To Date
GANSW	Government Architect New South Wales
GBA	Graham Brooks and Associates
GDE	Groundwater Dependent Ecosystem
GFA	Gross Floor Area
GPOP	Greater Parramatta and Olympic Park
GSC	Greater Sydney Commission
HC	Heritage Council Approvals Committee
HCA	Heritage Conservation Area
HCAC	Heritage Council Approvals Committee

Abbreviation	Definition
HIA	Historical (or Heritage) Impact Assessment
HNSW	Heritage New South Wales
Housing SEPP	State Environmental Planning Policy (Housing) 2021
HRV	Heavy Rigid Vehicle
IADV	Indigenous Architecture and Design Victoria
IWMP	Integrated Water Management Plan
LCA	Life Cycle Assessment
LEC	Land and Environment Court
LEP	Local Environmental Plan (e.g. Parramatta LEP 2011 or 2023)
LGA	Local Government Area
LSJ	Lee Symington Johnston
LSPS	Local Strategic Planning Statement
MCHF	Maronite College of the Holy Family
NCC	National Construction Code
NGL	Natural Ground Level
NPI	National Pollutant Inventory (where used in environmental references)
NRAR	Natural Resources Access Regulator
NSW	New South Wales
NSWHC	New South Wales Heritage Council
OECD	Organisation of Economic Co-operation
OEH	Office of Environment and Heritage (now Environment and Heritage Group within DCCEEW)
OLACC	Our Lady Aged Care Centre
LOLC	Our Lady of Lebanon Co-Cathedral
OSD	On-site Detention
PDCP	Parramatta Development Control Plan
PMF	Probable Maximum Flood
PRFS	Parramatta River Flood Study
PSI	Preliminary Soil Investigation
PV	Photovoltaics
RAPs	Registered Aboriginal Parties
RAPs	Remediation Action Plan
RDTEM	Research Design and Test Excavation Methodology
RFB	Residential Flat Building
RFI	Request for Information
RL	Reduced Level
RMS	Roads and Maritime Services (now part of Transport for NSW)
RPA	Registered Proprietary Authority (used in legal planning context)
SCC	Site Compatibility Certificate
SDRP	State Design Review Panel
SEARs	Secretary's Environmental Assessment Requirements
SEPP	State Environmental Planning Policy
SES	State Emergency Service
SHI	Statement of Heritage Impact
SHR	State Heritage Register
SIA	Social Impact Assessment
SOHI	Statement of Heritage Impact
SRV	Small Rigid Vehicles
SRZ	Structural Root Zones
SSD	State Significant Development
SSDA	State Significant Development Application
TfNSW	Transport for New South Wales

Abbreviation	Definition
TPO	Tree Preservation Order
TPZ	Tree Protection Zone
UHI	Urban Heat Island
UN	United Nations
VIA	Visual Impact Assessment
VRZ	Vegetated Riparian Zone
WHS	Work Health and Safety
WMA	Water Management Act 2000 (NSW)
WMP	Waste Management Plan
WRAPP	Waste Reduction and Purchasing Policy
WSUD	Water Sensitive Urban Design

Contact

This report has been prepared on behalf of 2A Gregory Place Pty Ltd. Pty Limited and Pacific Community Housing by:

Matthew Daniel, MPM, MBA (major PM) Grad Cert (Urban Planning).

James Matthews, BSc (City and Regional Planning) Dip. (Town Planning)

Pacific Planning Pty Ltd

Level G, 16 Leavesden Place
Sylvania

NSW 2224

M 0404 007 700, 0437 521 110

E: mdaniel@pacificplanning.com.au

E: jmatthews@pacificplanning.com.au

ABN: 88 610 562 760



Document Control

Version	Date	Notes	Prepared	Review
1	July 2025	Refined response to submissions – and collation of expert reports.	Matthew Daniel and James Matthews	JM, MD, RR.

All Rights Reserved. No material may be reproduced without prior permission from Pacific Planning Pty Ltd. Pacific Planning Pty Ltd while working on this project has tried to ensure the accuracy of the information in this publication, it accepts no responsibility or liability for any errors, omissions or resultant consequences including any loss or damages arising from reliance in the information in this publication.

We acknowledge the Cultural Landscape that we are working upon, and the Dharug people as the Traditional Custodians of the Country where 2A Gregory Place, Harris Park is located.

We acknowledge all First Nations people and their ongoing connection to culture, lands and waters and their valuable contribution to the community. We recognise, acknowledge, and extend our respects to many others who have custodial obligations for Country who have been connected to Dharug Country for many generations, including their Elders past, present and emerging.



Executive summary

This response to submissions report has been prepared to support the continued assessment of a state significant development (SSD) application at 2A Gregory Place, Harris Park. The proposal seeks concept approval under Part 4, Division 4.4 of the Environmental Planning and Assessment Act 1979 (EP&A Act) for a residential flat building development for the purpose of new housing of which at least 50% are proposed to be delivered as affordable rental dwellings in accordance with Chapter 2, Division 5 of the State Environmental Planning Policy (Housing) 2021 (Housing SEPP).

The application is made by 2A Gregory Place Pty Ltd in partnership with Pacific Community Housing, a registered community housing provider. The proposal follows the issue of a site compatibility certificate by the Planning Secretary (secretary) on 19 July 2017 under clause 37 of the former State Environmental Planning Policy (Affordable Rental Housing) 2009 (ARH SEPP) (now clause 39 of the Housing SEPP), confirming the suitability of the site for residential development. The project is identified as SSD due to its classification as build-to-rent housing, a capital investment value exceeding \$50 million, and its strategic location in metropolitan Sydney.

This report responds to matters raised during the public exhibition of the application between December 2022 and February 2023. It addresses submissions from the community, local government, and state agencies through a structured, evidence-based, and iterative process of design refinement and technical review. It also documents the outcomes of further targeted consultation undertaken post-exhibition, including continued engagement with state agencies (importantly - including the NSW Government Architect Office (GAO) and the state design review panel, Heritage NSW (HNSW) and the Heritage Council of NSW (NSW HC).

The process post exhibition included detailed and iterative consultation and engagement between the project team and key community stake holder organisations. Specific sessions and direct consultation included key stakeholders of community facilities in the locality including the Parramatta Historical Society, the Sydney Living Museums, the National Trust and the Local Cathedral Church community. Importantly specific cultural advisory engagement with local Aboriginal community members and leaders was undertaken. During the period the local community and wider community of NSW has been specially engaged via direct input and various representations from local elected members. The report is therefore the culmination of a comprehensive collaborative process intended to improve the design, enhance sustainability outcomes, and resolve concerns raised by stakeholders.

The report is structured to assist both the Department of Planning, Housing and Infrastructure (department) in assessment advice to the Minister for Planning and Open Spaces (Minister) and the community in understanding the evolution of the project, the basis of its need and justification, and its compatibility requirements aligned to the NSW the planning framework. It should be read in conjunction with the revised technical documents and supporting updated appendices, which collectively form the evidence base for assessment. Key components of the document include:

- **Section 1.2: updated project narrative** – describes the chronological evolution of the proposal, from initial feasibility testing through to the refined concept scheme now submitted. This section explains how the proposal responds to the SCC and has been shaped by community input, agency review, heritage constraints and site conditions.
- **Section 1.3: Structure of the submissions report** – outlines how the document is organised thematically and issue-by-issue, enabling the reader to locate and cross-reference concerns and responses easily.

- **Section 2.1 and 2.2: The need for affordable housing** – presents a detailed evidence-based analysis of the supply-demand imbalance for affordable housing in Parramatta LGA. It references housing stock, approvals, demographic trends, and LGA-level housing targets. Section 2.2 in particular provides a strategic justification for the affordable housing component of the proposal and confirms that current market failure necessitates immediate intervention through projects such as this.
- **Section 3.2 to 3.5: Compatibility and sustainability assessment** – presents a comprehensive triple bottom line assessment of the project’s social, environmental and economic compatibility. The methodology draws upon statutory objects in section 1.3 of the EP&A Act and applies a structured compatibility matrix model to test performance against relevant planning principles, strategic frameworks, sustainability benchmarks including comparison from local and world academic research.

Within this structure, the compatibility analysis is divided into the following components:

- **Section 3.4: Social compatibility assessment** – comprises a thematic analysis across eight domains, including housing need and affordability, social inclusion, integration with local infrastructure and services, safety and public realm, heritage and connection to Country, and resilience. Each theme is assessed against benchmarks drawn from academic literature, international research, and State planning policy, and is supported by updated expert input.
- **Section 3.5: Economic compatibility** – examines the feasibility and macroeconomic benefits of the project. It confirms that the height and density of the scheme are essential to ensure delivery of the affordable housing yield, which is financially underpinned by a cross-subsidisation model relying on build-to-rent tenure and economies of scale.
- **Section 3.6: Environmental compatibility** – refers to the detailed assessments provided in appendices relating to stormwater, ecological sensitivity, heritage interface, Aboriginal cultural values and sustainability performance. The development integrates water-sensitive urban design, protects adjoining riparian corridors, and removes obsolete and unsympathetic industrial form from a historically and environmentally significant site.

The appendices to this report are critical to understanding the full assessment framework. Key reports include:

- **Urban design and built form addendum** – demonstrating revised massing and urban form strategies that improve visual integration and respect heritage settings.
- **Statement of heritage impact and updated archaeological assessments** – confirming that heritage values are preserved and enhanced through the removal of adverse industrial form and the creation of a landscaped central corridor adjacent to Clay Cliff Creek.
- **Visual impact assessment** – showing that revised setbacks and height transitions avoid adverse impacts on heritage items, public views, and nearby open spaces.
- **Social impact assessment** – confirming enduring community benefit and explaining how public submissions have informed refinement of the design.
- **Groundwater, flooding and infrastructure reports** – ensuring compatibility with downstream environmental infrastructure and confirming compliance with key regulatory standards.

This revised concept proposal has been refined to respond directly to the concerns raised in submissions. Following exhibition of the application, and the consideration of matters raised, a new

evidence-based approach to the design has been adopted and urban proposition for the site has changed, which includes adopting a new lead design architect for the project, with a new set of objectives to guide the design and urban proposition for the site, with the objective to introduce a new fresh co-design methodology that responds to the submissions within the site's culturally significant setting and pre-colonial landscape.

Key changes include the redistribution of building height, increased separation between buildings, introduction of improved public open space and landscaped interfaces, and a renewed commitment to the heritage setting of Hambledon Cottage and its broader cultural landscape.

The overall building footprints and floorspace have been reduced, resulting in the reduction of indicative apartments from 483 to 320. The setbacks to all interfaces have been increased, with a variety of setbacks to the Clay Cliff Creek channel adopted to create an expansion and contraction of space experience in the updated built form, to create a walk that is rich in experiences, moments and nodal points that engage with the whole of the site. Building C has been significantly reduced in height and footprint, while a new shared-way along on the northern interface assists with access and setbacks to Hambledon Cottage.

The evidence-based design process established a new set of design guidelines, which are outlined under Section 8 of the attached design report. These design guidelines provide controls to establish footprints, open space, envelopes, setbacks, character statements, and specifically define heights through solar access planes. The methodology for the updated and revised controls is guided by compatibility, as discussed under Section 3 of this report.

Through this refinement and assessment process, the project team has demonstrated that the proposal is compatible with the site's environmental and heritage constraints, aligned with strategic planning objectives, and capable of delivering significant social benefit. The proposal satisfies the policy intent of chapter 2, division 5 of the Housing SEPP and responds to the urgent need for affordable rental housing in a high-demand, infrastructure-rich location.

This response to submissions report confirms that the proposal remains worthy of support and should progress to determination. It advances the objectives of the EP&A Act, particularly in promoting ecologically sustainable development, facilitating orderly and economic use of land, and providing for the housing needs of the community. In doing so, it offers a model for inclusive and context-sensitive renewal on former industrial land in a strategically significant precinct.

1 Introduction

In July 2022, an environmental impact statement (EIS) for the SSD application (SSDA) for a build-to-rent residential development at 2A Gregory Place, Harris Park, in the City of Parramatta local government area (LGA) was submitted to the Department of Planning and Environment (DPE) (now Department of Planning, Housing and Infrastructure (department)).

The SSDA seeks consent for concept approval in accordance with the provisions of section 4.21 and 4.22 of part 4, division 4.4 concept development applications of the EP&A Act in relation to a proposed concept design for the subject site.

The project is classified as SSD as it comprises development for the purpose of ‘build-to-rent housing’ with a capital investment value (CIV) of more than \$50 million (with at least 60% of the capital investment value related to the tenanted component) on land within the Greater Sydney Region, pursuant to Clause 27 of Schedule 1 of State Environmental Planning Policy (Planning Systems) 2021 (PSEPP).

The planning for the site has been in progress for a number of years. On 19 July 2017, under the provisions of clause 37 of Chapter 2, division 5 of the ARH SEPP (now Housing SEPP) a SCC was issued by the secretary.

Schedule 2 of the SCC provided requirements to be addressed as part of the preparation of the application. This has resulted in a thorough process over a number of years to develop the project narrative and understand the historic cultural landscape to assist inform the final development layout for the site. What started with a 35 storey building form was subsequently modified. When lodged in July 2022, the concept application incorporated a residential apartment development of three (3) freestanding building forms arranged into an orthogonal layout of five fingers that varied in height from 4-8 storeys.

The concept incorporated approximately 10,210m² (52.4%) of landscaped area on the ground plane, comprising courts, passages, accessways, parks and the Clay Cliff Creek stormwater channel walk, and included approximately 483 dwellings (of which 50% are affordable housing) with 48,685m² of total gross floor area at a floor space ration (FSR) of 2.5:1.

The EIS was subsequently publicly exhibited from Tuesday 2 August 2022 to Monday 29 August 2022. In response to the exhibition the following submissions were received seven submissions from public authorities including:

- Department of Planning and Environment: Water, dated 31 October 2022
- NSW State Emergency Services, dated 29 August 2022
- Heritage NSW – Aboriginal Cultural Heritage Assessments, dated 22 August 2022
- Heritage NSW, dated 20 September 2022
- NSW Fire and Rescue, dated 4 August 2022
- Sydney Water, dated 11 August 2022
- Transport for NSW, dated 6 October 2022
- One submission was received from the City of Parramatta Council, dated 1 September 2022
- 104 public submissions were received, including, amongst others, submissions from:

- Parramatta and District Historical Society.
- Our Lady of Lebanon (LOL) Co-Cathedral.
- The National Trust.

Two letters were received from the department dated 7 September 2022 which incorporated a preliminary assessment, and a further letter dated 21 November 2022 which incorporated feedback from a consultant engaged by the department to provide advice to the department on urban design and heritage review.

This report responds to all issues raised during the exhibition period, including requests for information from the department, and matters raised by state agencies, council and the general public. It also outlines the iterative review process and revisions made to the scheme as a result of a new evidence-based methodology and urban proposition for the site.

1.1 Background

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

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

Subsequently, on 27 October 2016 a meeting was held with Department of Planning and Environment staff to discuss the proposal, and the potential to provide significant affordable housing in a strategically well positioned location due to its proximity to transport and services. The department was briefed on the proposed development outcome and the potential mechanism to achieve this through the ARH SEPP 2009 (now Housing SEPP 2021). The SCC application was lodged in December 2016.

On 19 July 2017, under the provisions of Clause 37 of Division 5 of the ARH SEPP a Site Compatibility Certificate (SCC) was issued, subject to conditions, for *“Residential flat development with a minimum of 50% of all residential product being made available for affordable rental housing for a minimum of 10 years”*.

Schedule 2 of the SCC provided, among other matters that *“Consultation with the NSW Office of Environment and Heritage and the Heritage Council of NSW regarding bulk and scale, and design principles to protect surrounding heritage items is to be undertaken through the development application process”*.

In accordance with the SCC, consultation with NSW Office of Environment and Heritage and the Heritage Council of NSW and their Approval Committee commenced and the concept was refined over a number of years and a number of working sessions. The final Heritage Council Approval Committee minutes, dated 2 March 2021, confirmed at point 4 that it:

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

Subsequently, In July 2022, an EIS was submitted for a SSDA to the department seeking consent for a concept approval (formerly known as a ‘*Stage 1 Development Application*’) in accordance with division 4.4 of the EP&A Act. The concept application would facilitate the future development of the site, which would facilitate the following developed design outcomes:

Three (3) freestanding building forms arranged into an orthogonal layout of five fingers.

- Varied heights, between 4-8 storeys.
- Approximately 10,210m² (52.4%) of landscaped area on the ground plane, comprising courts, passages, accessways, parks and the Clay Cliff Creek channel walk.
- Approximately 483 dwellings (of which 50% are affordable housing).
- 48,685m² of total gross floor area at an FSR of 2.5:1.

The built form and massing of the developed design is illustrated in Figure 2 below. The EIS was publicly exhibited from Tuesday 2 August 2022 to Monday 29 August 2022.



Figure 1 Concept Design 2015



Figure 2 Concept Design 2022

(Source: Stanisis Architects)

1.2 updated project narrative

Following exhibition of the application, and the consideration of matters raised, a new evidence-based approach to the design and urban proposition for the site has changed, which includes adopting a new lead design architect for the project, with a new set of objectives to guide the design and urban proposition for the site, with the objective to introduce a revised co-design methodology that responds to the submissions within the site's culturally significant setting and pre-colonial landscape. Those objectives, highlighted by Tzannes and Yerrabingin through the new co-design framework are outlined and analysed in Appendix A – Tzannes design report dated July 2025 (design report).

The dominant concerns raised through the exhibition process include impacts of the built form in relation to heritage contexts; the development of the landscape architecture; the addition of community facilities in the form of non-residential (retail) uses and potential bridge crossings of the channel; the enhancement of the adjacent parklands and Cliff Walk as destinations; views, vistas and solar access; connectivity of publicly accessible land; and vehicular access.

As a result of the matters raised, further consultation with the state design review panel (SDRP) and various stakeholders, an evidence-based set of design guidelines have been established and outlined under section 8 of the design report.

These design guidelines provide controls to establish footprints, open space, envelopes, setbacks, character statements, and specifically define heights through solar access planes. The methodology for the updated and revised controls is guided by compatibility, discussed further in this report. For example, the solar access planes that inform the height are guided by specific criteria to ensure any overshadowing of the OLOL Co-Cathedral Childcare Centre is in accordance with the Childcare Planning Guidelines.

The 2025 response to submissions scheme has reduced the overall building footprints and therefore floorspace, resulting in the reduction of indicative apartments from 483 to 320, which results in the reduction to the number of affordable apartments included within the development. The concept design is illustrated by Figure 3 below and includes the following key features:

- New pedestrian and cycle connections across the channel with improved walking experience alongside the channel.
- Integrated park precinct on both sides of the channel.
- Heavily landscaped cul-de-sac shared way to provide an address to all buildings and enhance the setting to Hambledon Cottage and Experiment Farm.
- Appropriate landscape views and vistas for heritage items and OLOLC.
- New connections between Experiment Farm, Hambledon Cottage, OLOLC and nearby neighbourhoods.
- Appropriate setbacks of built form.
- Varied and appropriately scaled built form across the site with reduced height along North and West boundary at the interface with Hambledon Cottage and Experiment Farm, and lower built form adjacent to OLOLC; and
- Less affordable housing.



Figure 3 Concept Design 2025

(source: Tzannes Architects)

1.3 Structure of submissions report

This response to submissions report has been prepared having regard to the department's guide named - *Appendix C to SSD Guidelines – Preparing a Submissions Report*. The report forms the first part of the

response to submissions, analysing the issues raised in submissions and explaining the actions and revisions to the concept application that have been undertaken since the exhibition. The report also provides a proper response to the submissions raised.

A number of important issues have been raised, and over 100 public submissions, with similar concerns were also provided. This led to a revised iterative evidence-based approach to the design, guided and informed by the submissions. In that context the proposed and provided structure of the report is as follows:

Section 1 – Introduction

Section 2 – Need for Housing and Affordable Housing

Section 3 – Assessing compatibility in the context of contemporary housing need

Section 4 – analysis of submissions

Section 5 – Summary of Changes

Section 6 – Engagement

Section 7 – Response to submissions

Section 8 – Response to Public Submissions

Section 9 - Conclusion

The second part of the Response to submissions includes the appendices to this main report. This is discussed under Section 1.5 below.

1.4 Attachments

As a result of the consideration of issues raised in submissions, additional information has been provided to support this response to submissions report. The following appendices should be read in conjunction with this report:

- Appendix A – Design Report
- Appendix B – Submissions Response Register
- Appendix C – Amended Clause 4.6 – Building Height
- Appendix D – Legal Opinion
- Appendix E – Visual Impact Assessment
- Appendix F – Accessibility Assessment Report
- Appendix G – BCA Assessment Report
- Appendix H – updated Environmental Wind Impact Study
- Appendix I – updated Ecologically Sustainable Design Report
- Appendix J – updated Demolition/Construction and Operational Waste Management Plan
- Appendix K – updated Acoustic Assessment
- Appendix L – updated Construction Noise and Vibration Management Plan
- Appendix M – updated Integrated Water Management Plan
- Appendix N – updated Flood Assessment

- Appendix O – Flood Emergency Response Plan
- Appendix P – updated Statement of Heritage Impact
- Appendix Q – Contamination Response
- Appendix R – Aboriginal and Historical Archaeological Response to Submissions
- Appendix S – updated Aboriginal Cultural Heritage Assessment Report
- Appendix T – updated Historical Archaeological Heritage Impact Assessment
- Appendix U – Transport and Accessibility Impact Assessment
- Appendix V – Preliminary Construction Traffic Management Plan
- Appendix W – Green Travel Plan
- Appendix X – updated Social Impact Assessment
- Appendix Y – updated Community and Stakeholder Engagement Report
- Appendix Z – Construction Management Plan
- Appendix AA – Draft Plan of Management
- Appendix BB – updated Economic Impact Assessment
- Appendix CC – updated Cost Report
- Appendix DD – Hydrogeological Response Letter
- Appendix EE – updated Infrastructure Delivery, Management & Staging Plan
- Appendix FF – updated Arboricultural Impact Assessment, Tree Protection and Tree Management
- Appendix GG – BDAR Waiver Request

2 Need for housing and affordable housing

The provision of new housing, and in particular affordable housing, is one of the defining social and economic challenges currently facing the council and metropolitan Sydney¹. This section presents a rigorous, evidence-based assessment of the demand for additional housing and affordable housing in Parramatta, drawing on current census data², economic analysis³, and local and state planning strategies⁴. The analysis is informed by the most recent housing market data, government targets, and strategic policy settings at local and state levels.

The findings in this section establish the critical context for the Gregory Place proposal, demonstrating not only the scale and urgency of unmet demand, but also the persistent structural undersupply of affordable dwellings for low- and moderate-income households, key workers, and essential service staff⁵. The purpose of this assessment is to provide the Minister and decision-makers with a clear, factual basis for understanding the social and economic imperatives that underpin the project, and to directly respond to community and agency submissions regarding the real and present need for additional housing supply in Parramatta.

2.1 The need for housing in Parramatta

2.1.1 Housing stock

According to the economics report by Pacific Economics and Sustainability⁶, the housing stock in Parramatta rose by 10,435 between 2011 and 2021. There was a 51.1 per cent increase in apartments, from 17,869 in 2011 to 27,000 in 2021. The total housing stock rose by 23.9 per cent over the 10 years to 2021.

Table 1 Housing stock – Parramatta SA3

Type	2011	2016	2021
Houses (Separate and Semi-Detached)	25,759	25,797	26,848
Flat or Apartment	17,869	21,195	27,000
Occupied Private Dwellings	43,716	47,432	54,151
Change in Housing Stock (no.)	2011-2016	2016-2021	2011-2021
Houses (Separate and Semi-Detached)	38	1,051	1,089
Flat or Apartment	3,326	5,805	9,131
Occupied Private Dwellings	3,716	6,719	10,435
Change in Housing Stock (%)	2011-2016	2016-2021	2011-2021
Houses (Separate and Semi-Detached)	0.1%	4.1%	4.2%
Flat or Apartment	18.6%	27.4%	51.1%
Occupied Private Dwellings	8.5%	14.2%	23.9%

(Source: ABS Census 2021, ABS Census 2016, ABS Census 2011, Pacific Economics and Sustainability)

The housing stock (number of occupied private dwellings) increased by 6,719 over the 5 years from 2016-2021 and by 10,435 over the 10 years between 2011 and 2021.

¹ Appendix BB Economic Impact Assessment Pacific Economics and Sustainability (July 2025);

² Australian Bureau of Statistics, *2021 Census of Population and Housing*, Parramatta SA3 and LGA

³ Pacific Economics and Sustainability, as above; local market and rental data (ABS, CoreLogic, Domain)

⁴ City of Parramatta, *Local Housing Strategy 2020*; NSW Government, *Greater Sydney Region Plan*, *Central City District Plan*, *Parramatta Housing Target*

⁵ NSW Productivity Commission, *Review of Housing Supply in NSW*; AHURI, *Housing Australia's Key Workers: Policy Challenges and Solutions*

⁶ Appendix BB Economic Impact Assessment Pacific Economics and Sustainability (July 2025)

2.1.2 Housing demand

The population of the Parramatta SA3 has risen by 27,353 over the 10 year period from 2011 to 2021. This is a 21.9 per cent rise. While the population has risen by 27,353, the number of dwellings has only risen by 10,435, as shown in Table 1.

Table 2 Population – Parramatta SA3

Population – Parramatta SA3	2011	2016	2021
Population (Resident Persons) (no.)	124,775	140,891	152,128
	2011-2016	2016-2021	2011-2021
Change in Population (no.)	16,116	11,237	27,353
Change in Population (%)	12.9%	8.0%	21.9%

(Source: ABS Census 2021, ABS Census 2016, ABS Census 2011, Pacific Economics and Sustainability)

Table 2 shows the number of people usually resident in households in the Parramatta SA3. The data shows that nearly one-quarter of residents live alone, and a further 29 per cent of households are two-person households. The proportion of households with 3 or 4 persons is 39 per cent.

2.1.3 Housing approvals

Over the 10 years from 2011 to 2021, the population of Parramatta rose from 124,775 to 152,128 – a 21.9 per cent increase.

Dwelling approvals have been on an eight-year downward trend until the 2024-25 financial year. In 2016-17, 3,617 apartments were approved in Parramatta LGA; in 2024-25 (annualised), 3,358 are set to be approved if the current trend continues. As shown in Table 5, 2023-24 saw the lowest number of apartment approvals in at least 9 years and represents a 56.6 per cent drop in apartment approvals since 2016-17. Even with the rebound in 2024-25, apartment approvals are down 17 per cent since 2016-17.

Table 3 Dwelling approvals, Parramatta local government area

	Number			Change		
	Houses	Other	Total	Houses	Other	Total
2024-25 FYTD	155	1,524	1,679	121	220	341
2024-25 (annualised)	310	3,048	3,358	121	220	341
2023-24	342	1,980	2,322	63	483	546
2022-23	405	2,463	2,868	-55	-416	-471
2021-22	350	2,047	2,397	-81	815	734
2020-21	269	2,862	3,131	4	948	952
2019-20	273	3,810	4,083	66	-261	-195
2018-19	339	3,549	3,888	-52	122	70
2017-18	287	3,671	3,958	--	--	
2016-17	155	1,524	1,679			

(source I.D Profile, Pacific Economics and Sustainability)

This trend is also shown in Figure 4, which shows the sharp decline in apartments and total dwelling approvals, partially offset by the rise in 2024-25. There is an affordability crisis in Sydney (and all over Australia). The main culprit is undersupply. This has been articulated by the NSW Productivity Commission (see Chapter 4), and many other mainstream economists.

2.1.4 Parramatta’s housing target and performance against target

Parramatta has a housing target of 19,500 completed dwellings by 2029. This equates to 3,900 per year, on average, over the years 2025-2029. The average number of approvals for the last three years (2022-23 to projected 2024-25) was 8,548, or 2,849 per year. Completions can lag approvals by as much as three years depending on the complexity of the project – apartments will take longer to build than, for example, a dwelling house. In addition, not all approvals will result in completions. A rule of thumb is that 75 per cent of approvals result in completions. Most dwelling approvals in Parramatta are for apartments.

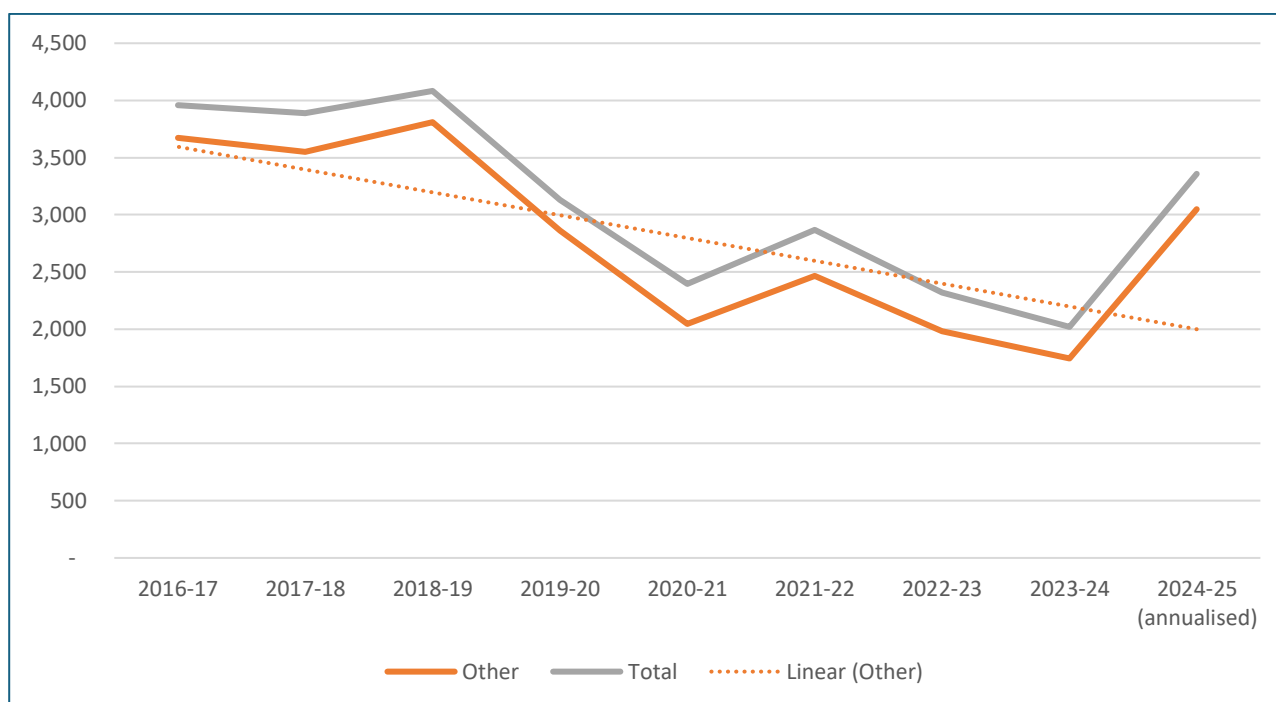


Figure 4 Dwelling approvals, Parramatta LGA

(Source: i.D Profile, Pacific Economics and Sustainability)

Table 4 shows the theoretical completion for the approvals from 2022-23 onwards, taking into account a five year lag and 75 per cent conversion from approvals to completions. Approvals for 2022-23 to 2024-25 have used actual approvals, while the average for those years is used as the forecast for 2025-26 and beyond.

Table 4 Projected completions compared with housing target

Approval Year	Approvals	Completion Year	Number of Dwellings (75% of Approvals Result in Completions)	Cumulative to Target	Number of Dwellings (80% of Approvals Result in Completions)	Cumulative to Target	Number of Dwellings (100% of Approvals Result in Completions)	Cumulative to Target
2022-23	2,322	2025-26	1,742	1,742	1,858	1,858	2,322	2,322
2023-24	2,020	2026-27	1,515	3,257	1,616	3,474	2,020	4,342
2024-	3,358	2027-28	2,519	5,775	2,686	6,160	3,358	7,700

25								
2025-26	2,567	2028-29	1,925	7,700	2,053	8,213	2,567	10,267
2026-27	2,567	2029-30	1,925	9,625	2,053	10,267	2,567	12,833

Source: NSW State Government; Pacific Economics and Sustainability

If 75% of approvals result in completions, Parramatta will fall 9,875 short of its 2029 housing target. Even if 100% of approvals result in completions, there will be a shortfall of 6,667 houses.

The North Parramatta precinct will deliver 2,000 new homes. However, it has not been approved yet. If all 2,000 houses are delivered by 2029, there will still be a shortfall from the target of between 4,667 and 7,875 houses.

2.1.5 Balance of supply and demand – Forecast deficit

Given the population growth and the pace of approvals, Pacific Economics and Sustainability has forecast an overall cumulative housing shortage by 2029 of 21,639 dwellings.

Knowing the stock of dwellings, the number of households, the number of persons per household and past growth rates, a surplus or deficit of housing can be calculated.

Firstly, the population growth rate from 2016 to 2021 can be calculated. The annual average growth rate between 2016 and 2021 was 1.6 per cent, as shown in Table 5.

Table 5 Average annual population growth 2016-2021, Parramatta SA3

	2011	2016	2021
Total persons	124,775	140,891	152,128
Periods			5
Average Annual Growth			1.55%

(Source: 2021 Census, Pacific Economics and Sustainability)

This growth rate can be applied to the current population to obtain a projection of the future population, the assumption being that growth will be linear. This is shown in Table 6 and shows the number of dwellings, on average, required to house the population with an average household size of 2.6.

Table 6 Population projection, Parramatta SA3

Year	Population	Persons Per Household	Households Required
2022	154,481	2.6	59,416
2023	156,870	2.6	60,335
2024	159,296	2.6	61,268
2025	161,760	2.6	62,215
2026	164,261	2.6	63,177
2027	166,802	2.6	64,154
2028	169,381	2.6	65,147
2029	172,001	2.6	66,154

(Source: 2021 Census, Pacific Economics and Sustainability)

Next the future dwelling stock can be estimated, taking the average annual growth in the stock from 2016 to 2021. Over the five years from 2016-21, the number of occupied private dwellings grew by 2.7 per cent, as shown in Table 7.

Table 7 Average annual growth in housing stock 2016-21, Parramatta SA3

	2011	2016	2021
Occupied Private Dwellings	43,716	47,432	54,151
Periods			5
Average Annual Change			2.7%

Source: 2021 Census, Pacific Economics and Sustainability)

From this a projection of dwelling numbers can be made, as shown in Table 8. However, the number of approvals before 2024-25 were running well short of the linear growth. Therefore, Table 8 also shows the stock applying approvals from 2022 to 2025 (as only about two-thirds of approvals are built, only two-thirds of the approvals have been taken to derive an estimate of the stock by 2029).

Table 8 Stock estimates based on linear growth and approvals, Parramatta SA3 and LGA

Year	Occupied Dwellings	Private	Increase Based on Linear Growth	Increase Based on Approvals	Stock Estimate Based on Approvals
2021	54,151				54,151
2022	55,605		1,454	1,434	55,585
2023	57,098		1,493	1,161	56,746
2024	58,631		1,533	1,010	57,756
2025	60,205		1,574	1,679	59,435
2026	61,822		1,617	1,297	60,732
2027	63,482		1,660	1,297	62,028
2028	65,186		1,704	1,297	63,325
2029	66,936		1,750	1,297	64,621

(Source: 2021 Census, i.D. Profile, Pacific Economics and Sustainability). Note that approvals are for the **LGA**. To take account of the smaller SA3 and that not all approvals become buildings, 50 per cent of the approvals in each year to 2024-25 have been taken up to 2025; from 2026 onwards, 50 per cent of the 5-year average approvals have been used to derive growth.

From the estimates of population, required dwellings and change in stock, a surplus or deficit of housing can be derived, which can then inform council about the dwelling task required. Table 9 shows that, by 2029, there will be a cumulative housing deficit in the Parramatta SA3 of between 12,900 and 21,639 dwellings. This is despite the balance between supply and demand turning positive by 2029 based on census numbers, but remaining in deficit based on approvals.

Table 9 Projected dwelling surplus/deficit, Parramatta SA3

Year	Linear Growth		Approvals	
	Surplus/Deficit on Linear Growth	Cumulative Surplus/Deficit	Surplus/Deficit on Approvals	Cumulative Surplus/Deficit
2022	-3,811	-3,811	-3,831	(3,831)
2023	-3,237	-7,047	-3,589	(7,419)
2024	-2,637	-9,684	-3,512	(10,931)
2025	-2,010	-11,694	-2,780	(13,711)
2026	-1,356	-13,050	-2,446	(16,157)
2027	-673	-13,722	-2,126	(18,283)
2028	40	-13,683	-1,822	(20,106)
2029	782	-12,900	-1,533	(21,639)

(Source: 2021 Census, i.D. Profile, Pacific Economics and Sustainability)

2.2 The changing need for affordable housing

Gregory Place is an attractive location for housing, close to transport, jobs, schools and amenity. With the housing shortage in Parramatta as a whole, people will undoubtedly be drawn to new apartments all over the LGA, including in Harris Park.

The economics report shows that rental vacancies in the 2150 postcode (Parramatta and Harris Park) dropped to 1.3 per cent in June 2025, with only 151 vacant properties available. This is down from (a still very low) 281 in December 2024. The number of vacancies has been below 200 since the June quarter 2022 (except for a one-off in the December quarter 2024). Rents rose from \$675 in June 2024 to \$690 in June 2025 – a 2.2 per cent increase through the year. In the three years between June 2022 and June 2025, rents have risen by 66.7 per cent, reflecting the undersupply of housing in the 2150 area.

In the week of 28 July 2025, there were only 195 listed rental properties in the 2150 postcode. The least rent a household would pay for a two-bedroom unit in postcode 2150 was \$500. For a household earning between \$80,000 and \$90,000, there were only 3 listings available in the whole area.

The benchmark for affordable housing is for a household to spend no more than 30 per cent of gross income on housing. Any higher than that, and those on 120 per cent of the median income or less are living in housing stress. In the Parramatta local government area (LGA), the median household income in the 2021 Census was \$2,051. As shown in Table 13, a household with \$1,641 income per week (80 per cent of the median household income) can afford a rent of \$492 per week. Any higher and they are in housing stress. A household with 120 per cent of the median weekly income (\$2,461) can afford to pay up to \$738 per week in rent before falling into housing stress. There were only 52 two-bedroom units that would have been affordable for a household on between 80 and 120 per cent of the Parramatta SA3 median income in the week of 28 July 2025, and 65 rental units available for those earning between 100 and 120 per cent of the median household income.

As shown in the economics report ¹, there are only 5 rental listings in the 2150 postcode that are affordable for households earning less than \$1,500 per week (up to \$78,000 per year – for comparison, the national minimum wage is \$47,622 per year). For households in the \$1,500-\$1,999 weekly income bracket, there were 55 affordable in the week of 28 July 2025. There were 120 vacancies affordable for those with incomes between \$2,000 and \$2,999 per week (up to \$156,00 per year) and 15 listings available for incomes over \$3,000 per week. Together, there are 180 listings that are affordable for the 61,981 households earning below \$3,000 per week.

The median rent Parramatta is \$695 per week. A single income household with a full-time worker on the minimum wage would be paying over three-quarters of their income in rent on the median 2 bedroom apartment in July 2025.

2.3 The need to increase housing in Parramatta

This section has shown that the council (council) is unlikely to achieve its housing target of 19,500 homes by 2029. Even if approvals rise markedly over the next two years, there will likely still be a shortfall of the target due to lags that occur between approval and completion.

analysis by Pacific Economics and Sustainability shows that council needs to focus on ensuring that the environment is supportive of development. On current approvals, the economic report ¹ projects a 21,000 housing deficit by 2029.

With the council unable to meet its targets and indeed getting further behind the when demand is compared to supply, it is inherent on them to facilitate developments such as 2A Gregory Place.

2.4 Conclusion

The evidence presented in this section clearly demonstrates that Parramatta faces a substantial and growing shortfall in both overall housing supply and affordable rental housing^{1 2}. Despite recent additions to the housing stock, population growth has consistently outstripped dwelling approvals and completions, resulting in a widening gap that cannot be closed by current trends alone⁷. Rental vacancies are at historically low levels and rents have escalated rapidly, outpacing wage growth and placing significant pressure on households across a range of income brackets^{1 2}. The council is unlikely to meet its government-mandated housing targets by 2029, even with projected increases in approvals, and will continue to face a cumulative deficit of dwellings unless substantial new projects are delivered⁸.

Within this context, the Gregory Place proposal represents a timely and strategic response to the documented demand, delivering well-located, high-amenity dwellings that are affordable to a diverse mix of households, including key workers, families, and those otherwise at risk of housing stress⁹. The proposal is consistent with State and local planning objectives¹⁰ and responds directly to the housing crisis articulated by the NSW Productivity Commission and other independent experts¹¹. The evidence base for intervention is overwhelming, and the case for new, fit-for-purpose affordable housing in Parramatta is clear and compelling. The Gregory Place development will not solve the entire housing crisis, but it represents a necessary and positive contribution to addressing the shortfall, improving affordability, and supporting the ongoing liveability and economic sustainability of the city¹².

3 Assessing compatibility in the context of contemporary housing need

This section provides an integrated assessment of the compatibility of the proposed development, referencing the objectives of the EP&A Act, particularly Section 1.3, and the enabling provisions of division 5 of the Housing SEPP. Compatibility in this context must be understood not solely as a question of physical or environmental fit but through a “triple bottom line” lens: encompassing social, economic, and environmental considerations, as articulated in the Ministerial Direction on Housing Delivery 2024 and reflected in contemporary Land and Environment Court (LEC) jurisprudence.

3.1 Legal and policy framework

3.1.1 Division 5 statutory framework, guidance, and legal interpretation

Division 5 of the Housing SEPP enables the delivery of residential flat buildings for affordable housing in zones where they would ordinarily be prohibited, subject to the grant of a SCC by the secretary (Housing SEPP, s38). The secretary’s determination under s39(6) must consider matters including bulk, scale,

7 Australian Bureau of Statistics, 2021 Census of Population and Housing, Parramatta SA3 and LGA; NSW Productivity Commission, Review of Housing Supply in NSW

8 NSW Government, Greater Sydney Region Plan, Central City District Plan, Parramatta Housing Target; NSW Productivity Commission, Review of Housing Supply in NSW

9 NSW Productivity Commission, Review of Housing Supply in NSW; AHURI, Housing Australia’s Key Workers: Policy Challenges and Solutions

10 City of Parramatta, Local Housing Strategy 2020; NSW Government, Greater Sydney Region Plan, Central City District Plan, Parramatta Housing Target

11 AHURI, Housing Australia’s Key Workers: Policy Challenges and Solutions; Property Council of Australia, Beyond Reach: The Essential Worker Housing Crisis in NSW (2023)

12 Pacific Economics and Sustainability, as above; local market and rental data (ABS, CoreLogic, Domain); NSW Government, Greater Sydney Region Plan, Central City District Plan, Parramatta Housing Target; AHURI, Housing Australia’s Key Workers: Policy Challenges and Solutions

environmental impact, infrastructure, and existing land uses. However, the SCC albeit a statutory instrument, does not grant development consent; rather, it serves as a mandatory gateway assessment and a material consideration for the subsequent development application.

The *Director-General's Site Compatibility Certificate Guideline*¹³ confirms that while an SCC is a threshold requirement for eligible proposals, the consent authority (including the Minister, where acting as consent authority for SSD) must still undertake its own independent and comprehensive assessment under section 4.15 of the EP&A Act¹⁴. The SCC is an important but not determinative consideration. The guideline also affirms that the consent authority may impose additional or stricter controls than those identified in the SCC, ensuring a robust assessment process responsive to site and policy context.

Senior Counsel advice (Lazarus SC and Doyle, 2023)¹⁵ further clarifies that the SCC is a material consideration to which the consent authority must give significant weight. The consent authority may (subject to proper consideration of the SCC) have regard to more stringent site and design features, conduct its own assessment of compatibility, and consider any other relevant matter (Housing SEPP, s38(3))¹⁶. The statutory hierarchy (EP&A Act, s3.28; Housing SEPP, s8) ensures that the Housing SEPP prevails over inconsistent local planning controls, so that the policy intent of division 5—to facilitate affordable housing in appropriate locations—is not frustrated by the rigid application of local controls or zone objectives.

Although the LEC has not directly adjudicated upon the precise statutory operation of division 5 or the weight to be afforded to a SCC under the Housing SEPP, a series of recent decisions have clarified important interpretive principles. In *Gales Holdings Pty Ltd v Tweed Shire Council [2023] NSWLEC 51*¹⁷, the Court considered the meaning of compatibility in the context of a State Environmental Planning Policy, holding that compatibility requires an evaluative judgment about whether a development proposal will sit harmoniously within its evolving context, taking into account both existing and future character as anticipated by policy. While *Gales Holdings* did not address division 5 directly, its discussion underscores the necessity for consent authorities to assess compatibility in light of strategic planning objectives, rather than by narrow reference to existing local circumstances alone. This is particularly germane in division 5 cases, where the underlying policy intent is to facilitate new affordable housing outcomes, often in established residential or mixed-use environments.

Similarly, in *Bunnings Properties Pty Ltd v Ku-ring-gai Council [2021] NSWCA 90*¹⁸, the Court of Appeal reinforced the requirement that State Environmental Planning Policies be interpreted and applied so as to give meaningful effect to their purposes, even where doing so may require some departure from local planning controls or established expectations. The proper construction of a SEPP involves a purposive reading, giving primacy to state policy objectives where they are clear and consistent with the statutory framework. This approach is directly relevant to division 5, as it guides the Minister in giving substantial weight to the Housing SEPP's aims—including the delivery of affordable housing and the implementation of site compatibility mechanisms—while still exercising a careful and balanced assessment of site-specific impacts and public interest considerations.

The Minister's assessment as consent authority will necessarily be guided by the current policy context and housing priorities of the government in which he serves. In recent years, there has been an increasing emphasis on the urgent delivery of affordable and diverse housing, as reflected in Ministerial Directions,

¹³ NSW Department of Planning, *Director-General's Site Compatibility Certificate Guideline for Applications, State Environmental Planning Policy (Affordable Rental Housing)* 2009, October 2009.

¹⁴ Environmental Planning and Assessment Act 1979, s3.28, s4.15

¹⁵ Appendix D - Pacific Community Housing – Division 5 Housing SEPP: Memorandum of Advice (Jason Lazarus SC & Justin Doyle), 10 August 2023.

¹⁶ State Environmental Planning Policy (Housing) 2021, ss8, 38, 39

¹⁷ *Gales Holdings Pty Ltd v Tweed Shire Council [2023] NSWLEC 51*

¹⁸ *Bunnings Properties Pty Ltd v Ku-ring-gai Council [2021] NSWCA 90*

public statements, and government strategy. This evolving policy landscape requires the Minister to give substantial weight to the Housing SEPP's objectives and to the role of division 5 in facilitating significant affordable housing outcomes, especially in locations traditionally constrained by local planning controls. Notwithstanding this, the Minister's consideration is not mechanistic: it remains a merit-based process that must interrogate the proposal's compatibility with its context, the robustness of the SCC, and the full spectrum of relevant environmental, social, and economic factors. This report proceeds on the basis that the Minister's ultimate decision will be shaped by both statutory requirements and contemporary government policy, interpreted and applied in the public interest through a rigorous and transparent planning assessment.

Taken together, these statutory provisions, policy guidelines, senior counsel advice, and relevant case law support an assessment framework in which the Minister, as consent authority, gives due and genuine consideration to the SCC, approaches the compatibility test with reference to the policy purposes of the Housing SEPP, and weighs the proposal's contribution to strategic housing outcomes as part of a triple bottom line evaluation.

3.1.2 A person-centred outcome

At its heart, the compatibility of this scheme aligned to the projects purpose and legislative assessment pathway, must be measured by its real-world impact on the lives of people for whom housing security remains out of reach. The future residents of Gregory Place are not an abstract group; they are the young couples who wish to start a family, but for whom escalating rents and unattainable home prices force difficult, sometimes heartbreaking decisions about their futures. They are essential workers, carers, people living with disability, newly arrived migrants, and families facing disadvantage or uncertainty—individuals who too often are excluded from the stability and dignity that safe, affordable housing brings.

This project seeks to offer these individuals and families more than just shelter. It creates the foundation for aspirations—enabling people to build careers, raise children, participate in their communities, and contribute to a fairer, more inclusive society. For many, this housing is the base from which to progress, to gain education or employment, and to lay down roots in a community. The benefits will ripple outward, helping to stabilise neighbourhoods, support local businesses, and strengthen social cohesion.

It is therefore not enough to frame compatibility only in policy or planning terms. The Minister's task is to consider—at a personal and practical level—whose life will be changed for the better. This is the core public interest that must be at the centre of any assessment. The Gregory Place project is designed for those who have, until now, been left behind by the mainstream housing market. It embodies the government's commitment to dignity, opportunity, and the principle that a prosperous, egalitarian society must extend its benefits to all—not merely to those with existing wealth or familial support.

The success of this project should be measured by the stories of those who will finally have a home of their own, a place to build a future, and the dignity that comes from security and belonging.

3.2 Compatibility and sustainability assessment

Recent State Government policy directions have placed even greater emphasis on increasing the delivery of both affordable and market housing in established, well-serviced areas of metropolitan Sydney. This shift is reflected in Ministerial Directions and statements from the Minister for Planning and Public Spaces, who has repeatedly underscored the need to fast-track new housing supply in locations that are close to jobs, schools, public transport, and essential infrastructure. As Minister Paul Scully recently stated, *"We have a responsibility to deliver more homes in the places people want to live, where they have access to transport, employment and services. That means saying yes to good projects in*

established areas, and making sure the planning system supports delivery at scale.”¹⁹ Further, on 11 July 2024²⁰, Minister Scully affirmed that the Minns Government is “*committed to building a better NSW with more homes so young people, families and workers have somewhere to live,*” emphasising reforms to streamline approvals, introduce performance monitoring, and incentivise planning authorities to meet housing targets. This policy focus is further reinforced by new housing targets, streamlined assessment pathways, and reforms under the Housing SEPP and related State Environmental Planning Policies, all aimed at tackling the housing shortfall and restoring affordability across Greater Sydney.

The preceding analysis has demonstrated that the council faces a persistent and well-evidenced shortfall in housing supply—particularly affordable rental accommodation for key workers, families, and lower-income households. While the scale of unmet need is clear, the planning framework also requires that any new proposal demonstrate compatibility with its physical, social, and environmental context. The challenge for the Gregory Place project, therefore, is not only to address this pressing need, but to do so in a manner that respects the character of Harris Park, integrates with existing and planned infrastructure, supports heritage values, and advances long-term community sustainability. The following section sets out the methodology and evaluative tools applied to test the compatibility and sustainability of the proposal in practical, statutory, and policy terms.

3.3 Introduction to the compatibility matrix assessment model

The assessment and reporting of compatibility and sustainability for the Gregory Place project has required a transparent, structured, and academically rigorous approach. The project has been subject to a substantial volume of community submissions, expert opinions, agency input, and multiple rounds of detailed design refinement. Given this complexity and the high level of public interest, it is essential that our evaluation is not only comprehensive but also easily understood by the Minister, the department, council, and the community.

To achieve this, the authors have developed the *Compatibility Matrix assessment model* (Figure 1) for affordable housing urban sustainability. This model is designed to provide a logical, stepwise pathway for interrogating and demonstrating compatibility across the three core elements of sustainability from the EP&A Act—being social, economic, and environmental.

This model emerged from the recognition that assessing compatibility in urban planning is inherently complex—particularly where heritage character, planned transition, and social sensitivity intersect. Compatibility is not a formulaic or binary concept. It demands a careful negotiation between subjective values, contextual performance, and statutory intent. These challenges are amplified in areas of high community value, where attachment to place, concerns about change, and the evolving expectations of sustainability require a methodical and honest planning response. The *Compatibility Matrix model* is designed to provide that response. It disaggregates the broad planning question of compatibility into its component themes, enabling each to be examined in detail using grounded, evidence-based questions that draw from statutory objectives, policy benchmarks, expert evidence, and community input.

At the heart of the model is the principle that genuine compatibility is not limited to physical design or statutory compliance alone, but must also encompass broader considerations of social benefit, economic viability, and environmental stewardship. The assessment begins with a rigorous review of statutory and policy context, including the EP&A Act, Housing SEPP, and relevant Ministerial Directions. It then moves through the creation of tailored themes for each category, systematically analysing key

¹⁹ Minister Paul Scully, “Media Release: Boosting Housing Supply in Established Areas”, NSW Government, 2024.

²⁰ NSW Government. “Council performance to be ranked to meet housing targets.” Media release, 11 July 2024.

questions and testing responses against both the local context and best practice academic research, both nationally and internationally.

Each of the three pillars—social, economic, and environmental—receives its own dedicated analysis and conclusion, drawing upon the wide range of expert reports, consultation feedback, and evidence generated throughout the project’s evolution. The model culminates in a balanced, integrated assessment that makes visible the reasoning behind compatibility determinations. In doing so, it transforms compatibility from a subjective assertion into a transparent, measurable, and contestable planning outcome.

This is more than a framework for assessment. It is a model of civic accountability—structured not only to justify a conclusion, but to demonstrate the intellectual and ethical pathway by which that conclusion has been reached. Ultimately, the model enables decision-makers to engage not just with the built form itself, but with the broader question: is this a good place for people, and will it make our city better?

In presenting this approach, we offer a clear, logical, and defensible framework for evaluating the Gregory Place project—one that supports both accountability, transparency and public confidence in the assessment process presented.

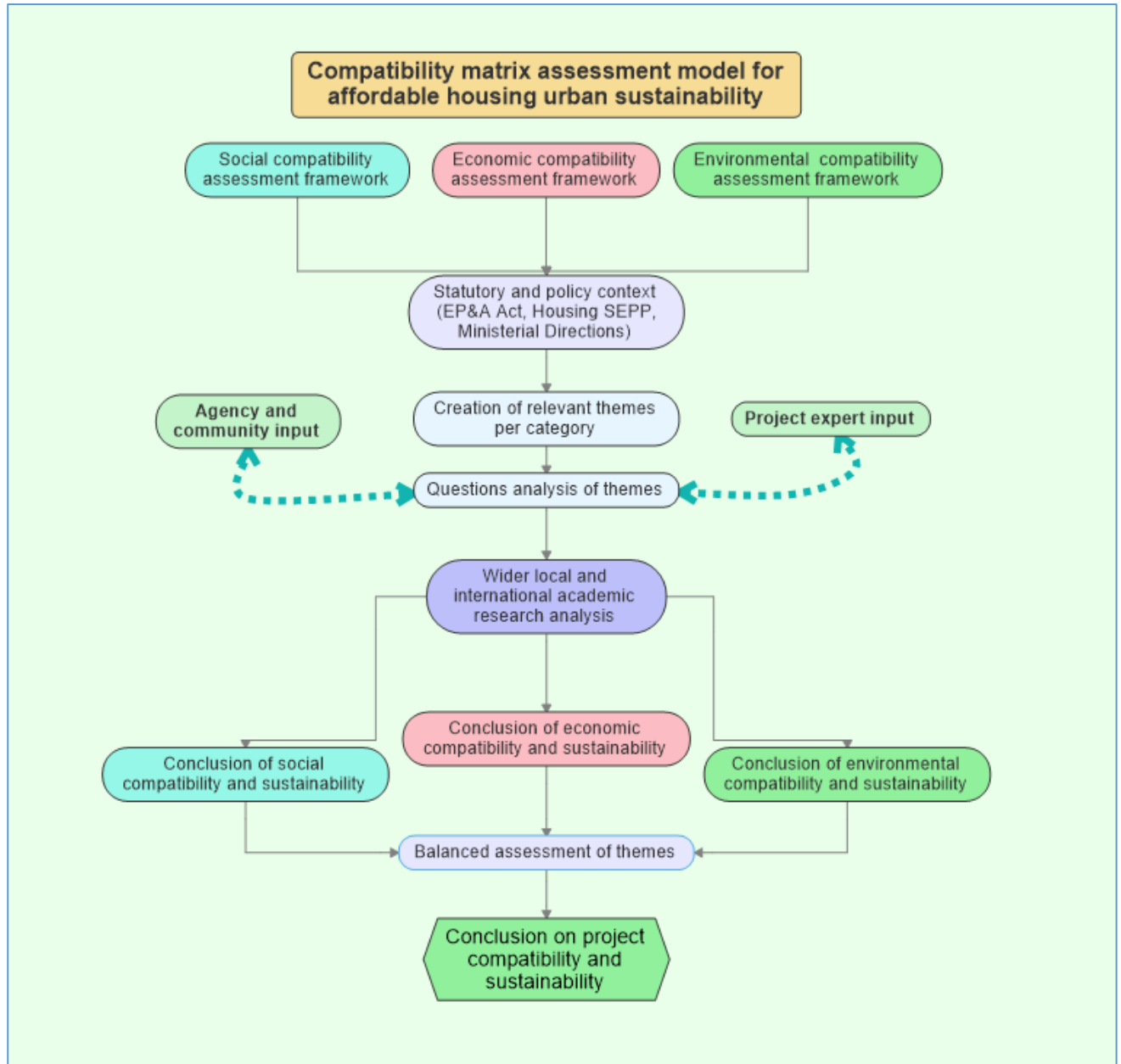


Figure 5 Compatibility matrix assessment of compatibility model

3.4 Social compatibility: Context and method of assessment

Social compatibility is at the heart of the planning system’s purpose, requiring the Minister and the consent authority to test whether a proposal genuinely enhances the social and economic welfare of the community, delivers affordable and inclusive housing, and contributes positively to the character and cohesion of local neighbourhoods. Under section 1.3 of the EP&A Act, the objectives of planning in New South Wales explicitly include the promotion of social and economic welfare, the delivery and maintenance of affordable housing, the sustainable management of built and cultural heritage (including Aboriginal cultural heritage), the promotion of good design and amenity, and increased opportunities for community participation in decision-making.

The principles of the Housing SEPP 2021 further reinforce the importance of enabling diverse and purpose-built housing types, particularly for vulnerable members of the community; encouraging development in locations with access to existing and planned infrastructure and services; ensuring new

homes provide a reasonable level of amenity; and designing new housing to enhance and reflect the identity of the locality. These objectives and principles are not abstract aspirations but practical obligations that must be met through every aspect of project design, consultation, and assessment.

3.4.1 Methodology for social compatibility assessment

Rather than assuming compliance or relying solely on broad policy statements, the following sections set out a comprehensive framework of questions to test whether the Gregory Place proposal addresses real community need, supports inclusion and wellbeing, integrates with local services, responds to the cultural and historical context, and creates lasting public benefit.

To ensure that the assessment of social compatibility is both rigorous and meaningful, this report adopts a structured, question-led methodology from the *Compatibility Matrix model*. This approach is designed to move beyond surface-level compliance, enabling a thorough interrogation of whether the proposal achieves genuine public benefit on social merit grounds. By articulating and responding to a comprehensive set of questions, the assessment provides a clear, transparent rationale for how the project addresses social need, supports inclusion and cohesion, integrates with the surrounding community and infrastructure, and aligns with the objectives and principles set out in the Environmental Planning and Assessment Act and the Housing SEPP.

To assist the Minister, as consent authority, in evaluating the social merit of the Gregory Place proposal, this section adopts a theme-based framework for assessment. The themes have been developed and refined through detailed social impact analysis, policy review, local research, and community engagement and reflection and guidance from scholarly articles and academic research to support a best practice analysis process. Each theme reflects a key statutory or policy objective for social outcomes, ensuring that every dimension of social compatibility—community cohesion, inclusion, access to infrastructure, safety, equity, health and wellbeing, and heritage connection—is explicitly tested.

For each theme, the report sets out its purpose and statutory context, followed by a series of targeted questions to interrogate how the project performs in that area. Each question is then answered in detail, drawing on the best available evidence, direct quotations from the Social Impact Assessment (SIA) and other expert reports, relevant policy and academic research, and the experience and input of local stakeholders. This approach ensures that the Minister, as consent authority, can clearly understand and rigorously assess the project's social merit and its lasting public benefit for Harris Park, Greater Parramatta, and metropolitan Sydney.

3.4.2 Social compatibility themes and testing framework

The assessment proceeds in accordance with the logical framework illustrated in Figure 2 beginning with the statutory and policy context, progressing through thematic objectives and targeted questions, and concluding with detailed evidence-based answers for each theme. Finally, the themes are tested against key academic research to test alignment with best practice. This approach ensures a transparent, rigorous, and accountable evaluation of social merit, enabling the Minister—as consent authority—to make an informed decision on the proposal's social compatibility and lasting benefit for the community.

3.4.3 Social theme identification

3.4.3.1 Theme 1: Social need, affordability, and diversity

The promotion of social and economic welfare, the delivery and maintenance of affordable housing, and the creation of diverse, inclusive neighbourhoods are explicit objectives of section 1.3(a) and (d) of the EP&A Act. The Housing SEPP 2021 reinforces these aims, requiring the enabling of diverse housing types

and meeting the needs of vulnerable community members, including very low to moderate income households and key workers. In Greater Parramatta and Harris Park, housing affordability and demographic diversity are under significant pressure from rising rents, market exclusion, and rapid urban change. The purpose of this theme is to ensure the project responds directly to demonstrated social need, aligns with government targets and community priorities, and enables a diverse, resilient population to remain and thrive in the area.

Key questions to interrogate social need, affordability, and diversity:

1. Will the proposal address a clearly evidenced need for affordable, secure, and appropriate housing for local residents, key workers, families, and those excluded from the housing market?
2. Does the housing mix, tenure, and management model respond to the needs of lower- and moderate-income households, people at risk of housing stress, and the diverse demographic profile of the area?
3. How does the project perform against the targets and objectives set out in Parramatta's Local Housing Strategy, State and National policy, and relevant Ministerial Directions for affordable housing and social inclusion?
4. Is the project grounded in the real needs, stories, and aspirations of the people who will live there?

3.4.3.2 Theme 2: Social inclusion, cohesion, and participation

The principles of social inclusion, community cohesion, and active participation are central to both the objectives of section 1.3(a) and (d) of the EP&A Act and the principles of the Housing SEPP 2021, which require planning and development to enable diverse communities and support vulnerable and disadvantaged groups. In the context of Harris Park—a locality recognised for its cultural and demographic diversity—social inclusion involves the fostering of strong relationships, mutual respect, and shared belonging among residents of different backgrounds, generations, and faiths. The objective is to ensure that the project builds, rather than fragments, the social fabric, and provides opportunities for all residents to participate in and contribute to the community.

Key questions to interrogate social inclusion, cohesion, and participation:

1. Will the development foster social inclusion, cohesion, and a sense of belonging for both new and existing residents, supporting intercultural, intergenerational, and interfaith connections?
2. Does the design support both informal and formal social interaction, reduce isolation, and enhance the mental health and wellbeing of residents?
3. Are there communal areas and shared spaces that enable participation, community-building, and cultural expression for all groups?
4. Are there mechanisms for resident participation, empowerment, and voice in ongoing management and community life?

3.4.3.3 Theme 3: Integration with social infrastructure and services

The integration of new development with existing social infrastructure is a key objective of the planning system, supported by section 1.3(a), (c), and (d) of the EP&A Act and by the Housing SEPP 2021, which prioritises the location of housing where it can make good use of existing and planned infrastructure and services. In the context of Harris Park and Greater Parramatta, successful integration means ensuring that new residents have reliable access to schools, childcare, health facilities, parks, community centres, and public transport, without causing unacceptable strain or displacement for existing users. This theme also addresses the importance of engaging service providers and community stakeholders to plan for growth and access.

Key questions to interrogate integration with social infrastructure and services:

1. Does the development integrate with, support, and enhance existing social infrastructure—such as schools, childcare, health services, and recreation—without creating unacceptable demand or displacement?
2. Have local service providers, council, and community stakeholders been engaged in planning for access and capacity?
3. How does the proposal connect residents to transport, employment, education, and digital opportunity, ensuring practical participation in daily community life?

3.4.3.4 Theme 4: Safety, security, and public realm

Safety and security, both real and perceived, are core objectives of good planning and are embedded within section 1.3(g) and (h) of the EP&A Act, which promote good design, amenity, and the proper construction and maintenance of buildings. The Housing SEPP 2021 further requires that housing development provides a reasonable level of amenity for residents and the broader community. In the context of Harris Park, where there is a diverse urban population and varying community expectations, it is essential that new development supports actual and perceived safety, reduces opportunities for crime or antisocial behaviour, and enhances the quality and use of public spaces —especially for women, children, older persons, and groups at greater risk of exclusion or harm. This theme also recognises the role of design, surveillance, and management in creating safe, inviting spaces that foster positive social interaction and a sense of belonging.

Key questions to interrogate safety, security, and public realm:

1. Will the scheme enhance safety, security, and wellbeing for all users, particularly for groups more vulnerable to exclusion?
2. Does it incorporate best practice design, passive surveillance, and management to support safety and amenity for the broader community?
3. Are design and operational responses in place to address risks of antisocial behaviour, noise, or privacy impacts?

3.4.3.5 Theme 5: Heritage, identity, and connection with Country

The sustainable management of built and cultural heritage, including Aboriginal cultural heritage, is a central object of section 1.3(f) of the EP&A Act. The Housing SEPP 2021 also reinforces the importance of designing housing that reflects and enhances its locality and connects residents with the unique identity of place. In Harris Park—a locality rich in Aboriginal, colonial, and multicultural history—this theme involves acknowledging, respecting, and interpreting heritage in both physical design and social practice. Connecting with Country principles, co-design with Traditional Owners, and active celebration of cultural diversity are all essential for fostering a shared sense of belonging and identity.

Key questions to interrogate heritage, identity, and connection with Country:

4. How does the scheme acknowledge, respect, and interpret the Aboriginal, colonial, and multicultural heritage of the site and locality?
5. Does it deliver real Connecting with Country outcomes in landscape, design, interpretation, and partnership with Traditional Owners and knowledge holders?
6. Will the project enhance public understanding, learning, and shared identity by integrating heritage, culture, and place into daily experience?

3.4.3.6 Theme 6: Resilience, adaptability, and ongoing compatibility

Resilience and adaptability are essential qualities of socially sustainable development, ensuring that new housing can support residents and the community through changing social, economic, and health conditions over time. Section 1.3(b) and (a) of the EP&A Act require that decision-making integrates social considerations and promotes community welfare for current and future generations. The Housing

SEPP 2021 encourages housing models and management approaches that can respond to evolving needs and challenges, including economic downturns, public health crises, and demographic shifts. This theme addresses not only the initial compatibility of the proposal, but its capacity to remain socially sustainable and beneficial in the long term.

Key questions to interrogate resilience, adaptability, and ongoing compatibility:

1. Is the proposal resilient and adaptable to future social, economic, or health shocks, supporting both individual and community resilience over time?
2. Are there ongoing monitoring and adaptive management mechanisms to ensure the project remains socially compatible over its life?

3.4.3.7 Theme 7: Comparative and policy alignment

Assessment of social compatibility must consider not only how the proposal performs in isolation, but how it compares to alternative land uses and aligns with the broader statutory, policy, and strategic objectives for the area. Section 1.3 of the EP&A Act and the principles of the Housing SEPP 2021 require that planning decisions deliver public value, implement Ministerial and government priorities, and support recognised best practice for social wellbeing, health, and housing supply. This theme enables the Minister, as consent authority, to assess whether the project sets a new benchmark for inclusive, place-based renewal, and whether its assessment is supported by robust evidence and engagement.

Key questions to interrogate comparative and policy alignment:

1. How does the scheme compare, in terms of public value and social fabric, to retaining industrial uses or redeveloping for exclusive, high-cost housing?
2. Does the proposal set a new benchmark for inclusive, connected, place-based renewal in accordance with government and Ministerial priorities?
3. Is the assessment supported by robust social impact analysis, best practice research, and genuine community engagement?
4. Does the project directly align with and deliver on the objectives of the Act, the principles of the Housing SEPP, recent Ministerial Directions, and recognised best practice for social wellbeing, health, and housing supply?

3.4.4 Social theme compatibility analysis

3.4.4.1 Theme 1 analysis: Social need, affordability, and diversity

- 1. Will the proposal address a clearly evidenced need for affordable, secure, and appropriate housing for local residents, key workers, families, and those excluded from the housing market?**

The need for affordable and diverse housing in Harris Park and the broader Parramatta region is urgent and well-documented. According to the SIA, more than 34 per cent of renting households in Harris Park experience rental stress, with the greatest impact on essential workers, newly arrived migrants, young families, and single parents. The SIA further confirms that the area's housing market has become increasingly inaccessible for moderate and low-income earners, with sustained growth in rents and stagnating real wages intensifying exclusion²¹.

The council's Local Housing Strategy identifies a shortfall of at least 12,600 affordable dwellings by 2051 to maintain social and economic diversity and prevent the displacement of key workers, carers, and long-term local residents²². Recent research by the University of Sydney and AHURI reinforces these findings, with key worker groups—nurses, teachers, emergency service personnel, childcare and aged care workers—experiencing growing housing insecurity, longer commutes, and a reduced capacity to

²¹ Appendix X updated SIA Forward Thinking, Gregory Place (February 2025)

²² City of Parramatta, Local Housing Strategy (2020)

participate in local economic and community life²³. A significant body of research and advocacy, including work by the Property Council of Australia and the NSW Government, confirms the broader social and economic costs of this exclusion²⁴.

The Gregory Place proposal responds directly to these needs. Over half of the proposed dwellings are secured as affordable housing for at least 15 years, under formal agreement with a registered community housing provider, and prioritised for those earning less than 80 per cent of the area median income. The SIA demonstrates that this commitment will materially expand access to secure, well-located housing for groups most affected by the housing crisis, helping to retain essential workers in the region, supporting family formation, and contributing to workforce stability in critical local services. The project's focus on a mix of unit sizes and tenures, managed by an experienced provider, supports demographic diversity and enables the ongoing renewal and vitality of the Harris Park community.

2. Does the housing mix, tenure, and management model respond to the needs of lower- and moderate-income households, people at risk of housing stress, and the diverse demographic profile of the area?

The scheme has been specifically designed with reference to the needs and aspirations of the community as identified in the SIA and in engagement with council, social service providers, and key worker organisations. The concept scheme is design to enable dwelling mix that can include a substantial proportion of family-sized, adaptable, and accessible units to accommodate the needs of single parents, larger families, older residents, and people with disability. Secure management by a registered community housing provider ensures that eligibility, rent-setting, and ongoing tenancy support are governed by principles of transparency, equity, and long-term social benefit.

The development's tenure model supports both long-term affordability and stability, with nomination rights reserved for priority groups identified in State policy and the Local Housing Strategy. The SIA notes that this approach “*significantly improves the chances for vulnerable households to secure safe and stable housing in proximity to work, services, and social networks*”.

3. How does the project perform against the targets and objectives set out in Parramatta's Local Housing Strategy, State and National policy, and relevant Ministerial Directions for affordable housing and social inclusion?

The project is aligned with, and materially advances, all key local, State, and Commonwealth targets and policies for affordable and inclusive housing. The Local Housing Strategy, the Western Sydney District Plan, and the National Housing Accord each set ambitious targets for affordable supply, with an explicit focus on key worker accommodation and access to jobs, services, and infrastructure²⁵. The Gregory Place scheme responds to these objectives by delivering a quantum and tenure of affordable housing rarely achieved in the private market, in a location that directly supports the government's strategy to concentrate growth and social investment in accessible, high-amenity centres.

Recent Ministerial Directions and media releases have identified affordable key worker housing as a priority for metropolitan Sydney. By partnering with a registered community housing provider and formalising eligibility for low- and moderate-income households, the scheme sets a benchmark for public value and intergovernmental collaboration.

²³ Gilbert, H., Nasreen, Z. & Gurran, N. HOPE Housing: Essential Worker Housing in Sydney. The University of Sydney, 2023; Australian Housing and Urban Research Institute (AHURI). Key Worker Housing Session – National Housing Conference, 2022; Property Council of Australia. Beyond Reach: The Essential Worker Housing Crisis in NSW, 2023

²⁴ AccomNews. \$130 Million of New Affordable Housing Proposed for Key Essential Workers in Sydney, October 2023; NSW Government. New Homes Closer to Jobs and Services for Essential Workers in Sydney, Media Release, 2024; Commonwealth of Australia, National Housing Accord, 2022

²⁵ City of Parramatta, Local Housing Strategy (2020); NSW Government. New Homes Closer to Jobs and Services for Essential Workers in Sydney, Media Release, 2024; Commonwealth of Australia, National Housing Accord, 2022

4. Is the project grounded in the real needs, stories, and aspirations of the people who will live there?

The SIA and engagement process have placed the lived experience and aspirations of local residents, essential workers, and excluded groups at the centre of the project’s design and management²⁶. Direct input from nurses, teachers, community workers, migrants, and parents has informed the unit mix, the provision of communal and play spaces, and management commitments around eligibility and ongoing support. The proposal’s commitment to securing long-term affordable housing for those most at risk of exclusion ensures that new growth in Harris Park will sustain, rather than erode, the social fabric and opportunity of the area.

3.4.4.2 Theme 2 analysis: Social inclusion, cohesion, and participation

1. Will the development foster social inclusion, cohesion, and a sense of belonging for both new and existing residents, supporting intercultural, intergenerational, and interfaith connections?

The Gregory Place proposal is fundamentally structured to enhance social inclusion and community cohesion within Harris Park, a locality renowned for its cultural and demographic diversity. According to the SIA, 73 per cent of residents in Harris Park were born overseas, with more than 60 per cent speaking a language other than English at home. While this diversity has historically strengthened the area, ongoing pressures from housing exclusion and demographic change threaten to erode these social bonds.

The project specifically responds by incorporating a diverse mix of adaptable, accessible, and family-oriented dwellings, enabling people of various backgrounds, ages, and family structures to find suitable accommodation. Design elements—including communal rooms, open spaces, and ground-level gathering areas—are intended to foster both informal and structured social interaction. Partnerships with local CALD, Aboriginal, and community organisations are embedded in both the planning and ongoing management of the development, supporting cultural celebration, welcome for new arrivals, and enduring connection among long-term residents²⁷.

The design is further informed by Connecting with Country principles and the input of Traditional Owners and local knowledge holders, ensuring the public realm and landscaping are places for gathering, ceremony, storytelling, and cross-cultural exchange. Engagement with the community has demonstrated support for a project that enables families to stay together, sustains multicultural life, and offers opportunities for social advancement, rather than displacement²⁸.

2. Does the design support both informal and formal social interaction, reduce isolation, and enhance the mental health and wellbeing of residents?

The SIA highlights that well-designed affordable housing can help counteract social isolation and support mental wellbeing, especially for those experiencing financial stress, migration, or family change. Gregory Place incorporates both structured communal spaces (for meetings, events, playgroups, and learning) and informal gathering areas (shared gardens, seating, walkways) that encourage everyday interaction among residents. Research demonstrates that such design features—combined with tenure security and onsite management—enable residents to form informal support networks and reduce loneliness²⁹.

Specific initiatives include the provision of community rooms, children’s play areas, culturally relevant landscaping, and accessible spaces for older people and those with disability. These support the mental

²⁶ NSW Nurses and Midwives’ Association. *Nurses and Midwives’ Wages Curse Uncovered in NSW*. Published 2025. Available at: <https://www.nswnma.asn.au/nurses-and-midwives-wages-curse-uncovered-in-nsw/>

²⁷ SIA consultation findings; project Management Plan

²⁸ Community engagement summary

²⁹ AHURI, “Social Housing, Community, and Tenancy Management” (Wiesel et al., 2012)

and social wellbeing of all residents, fostering an environment where cultural and generational diversity are respected and celebrated.

3. Are there communal areas and shared spaces that enable participation, community-building, and cultural expression for all groups?

The proposed development is deliberately designed to facilitate high levels of social interaction and participation at multiple scales. Communal areas are located throughout the site, including rooms for meetings and classes, landscaped gardens, playgrounds, and open courtyards. These spaces are intended to be welcoming and accessible to all, with programming and management strategies developed in consultation with local residents, community groups, and housing provider partners. These facilities support cultural events, celebrations, and religious gatherings, while also providing venues for informal connections and daily social life.

4. Are there mechanisms for resident participation, empowerment, and voice in ongoing management and community life?

The long-term management agreement with a registered community housing provider includes formal mechanisms for resident engagement, feedback, and governance³⁰. Residents will have opportunities to participate in decision-making about the operation of communal spaces, programming, and local initiatives, fostering empowerment and a sense of ownership. Ongoing engagement is designed to ensure the development adapts to the changing needs and aspirations of its community, and that it continues to provide lasting public benefit.

3.4.4.3 Theme 3 analysis: Integration with social infrastructure and services

1. Does the development integrate with, support, and enhance existing social infrastructure—such as schools, childcare, health services, and recreation—without creating unacceptable demand or displacement?

The Gregory Place proposal is strategically located to optimise access to a wide range of existing social infrastructure, in line with section 1.3(a), (c), and (d) of the EP&A Act and the principles of the Housing SEPP 2021. The SIA confirms that the site is within easy walking distance of schools, early childhood centres, medical facilities, open spaces, community halls, and recreational amenities. The SIA's consultation with local service providers indicates that these facilities currently have the capacity to support an increased residential population, especially given the existing underutilisation in several sectors, such as bulk-billing medical clinics and early childhood care centres³¹.

The site's integration with the new Parramatta Light Rail, frequent bus services, and established cycle and pedestrian links further enhances resident access to jobs, education, health, and cultural opportunities across Parramatta, Westmead, and the broader metropolitan area. This reduces reliance on private cars, minimises traffic impacts, and supports both social and environmental sustainability.

To avoid displacement or excessive demand, the proposal includes ongoing engagement with council, schools, health providers, and community services to monitor capacity and address emerging needs. The SIA notes that growth in this location is consistent with council's strategy to concentrate new housing in areas with strong infrastructure and service capacity, thus reducing pressure on lower-density suburbs and preserving neighbourhood amenity elsewhere.

2. Have local service providers, council, and community stakeholders been engaged in planning for access and capacity?

³⁰ Appendix X - SIA consultation findings; project Management Plan; Affordable Housing Provider Management Agreement; resident participation protocol

³¹ Appendix X - SIA engagement summary and local service provider responses

Throughout the planning process, the project team has consulted with a wide range of stakeholders, including local schools, early learning centres, medical and allied health services, social service agencies, council officers, and community organisations³². The SIA documents feedback from these stakeholders, including confirmation of current capacity and the importance of early communication regarding anticipated growth. This engagement ensures that the project's impacts are anticipated, understood, and proactively managed, supporting a collaborative approach to neighbourhood change.

3. How does the proposal connect residents to transport, employment, education, and digital opportunity, ensuring practical participation in daily community life?

Gregory Place has been deliberately located and designed to maximise everyday access and participation. Proximity to the Parramatta Light Rail, bus routes, and active transport corridors allows residents—including those without private vehicles—to reach work, study, shopping, recreation, and health facilities with ease. The project includes provisions for high-speed internet and communal digital facilities, supporting residents' participation in education, remote work, and community engagement. This integration of digital infrastructure aligns with State and Commonwealth priorities for digital inclusion and supports equitable access to opportunity³³.

3.4.4.4 Theme 4 analysis: Safety, security and public realm

1. Will the scheme enhance safety, security, and wellbeing for all users, particularly for groups more vulnerable to exclusion?

Safety and security are foundational to public confidence in new housing and are a recurring theme in both statutory planning objectives and community feedback. The SIA identifies that well-designed affordable housing does not, in itself, generate increased crime or antisocial behaviour. On the contrary, studies referenced in the SIA and engagement with residents of similar projects across Parramatta LGA show that 73 per cent of neighbours reported little or no negative effect from new affordable developments, while only a small minority noted localised issues such as parking or noise³⁴.

Gregory Place applies best practice principles for Crime Prevention Through Environmental Design (CPTED), including clear sightlines, passive surveillance, active frontages, and well-lit pathways³⁵. Communal areas and open spaces are designed to encourage legitimate activity throughout the day and evening, which research shows is critical to enhancing actual and perceived safety—particularly for women, children, and vulnerable groups³⁶. The proposal also introduces night-time activity to currently underused areas adjacent to heritage items and open spaces, improving safety for places like Hambledon Cottage and Elizabeth Farm, which are otherwise unpopulated after dark.

2. Does it incorporate best practice design, passive surveillance, and management to support safety and amenity for the broader community?

The design integrates passive surveillance and visibility throughout the site, using clear building lines, transparent fencing, and accessible pathways. Dwellings and communal areas have direct visual connection to the street and public open spaces, fostering neighbourly awareness and discouraging antisocial behaviour³⁷. Ongoing management by a registered community housing provider includes responsive maintenance, security monitoring, and community engagement to quickly address emerging issues, ensuring the site remains safe and welcoming.

³² Appendix X - SIA consultation logs; Council and agency correspondence

³³ NSW Government, Digital Inclusion Policy (2023); Commonwealth of Australia, National Housing Accord, 2022

³⁴ Appendix X - SIA doorstep survey analysis

³⁵ Appendix A - updated Design report Tzannes; Appendix X – SIA Project Management Plan; Affordable Housing Provider Operational Guidelines

³⁶ AHURI, "Planning for Women's Safety in Urban Design," 2022

³⁷ Appendix A – updated Design report Tzannes

3. Are design and operational responses in place to address risks of antisocial behaviour, noise, or privacy impacts?

Management plans and tenancy policies require prompt intervention and support in cases of antisocial behaviour, with close working relationships established between the provider, council, and local police. Acoustic treatments, landscape buffers, and careful orientation of communal spaces help mitigate potential noise and privacy impacts on neighbouring properties and within the development itself. The SIA’s review of similar projects confirms that, where operational best practice is followed, negative amenity impacts are localised, minor, and readily managed³⁸.

3.4.4.5 Theme 5 analysis: Equity, opportunity and inclusion

1. Will the project promote equity, opportunity, and social mobility for people of all backgrounds, ages, and abilities—including people with disability and older persons?

The Gregory Place proposal is underpinned by a commitment to advancing equity and social opportunity for all residents, consistent with the objectives of the EP&A Act and the Housing SEPP 2021. The SIA demonstrates that Harris Park and Parramatta have higher proportions of key worker households, trades, lower-income families, and a greater share of culturally and linguistically diverse residents than the Sydney average. The development responds to this diversity by including adaptable and accessible dwellings, family-sized apartments, and units suitable for single persons, couples, older people, and people living with disability.

Nominations for affordable dwellings will be managed by a registered community housing provider, with clear policies to ensure that lower-income and at-risk groups, including people with disability and older persons, have access to appropriate housing. Secure, affordable housing in well-located developments is recognised in academic research as a driver of upward social mobility, workforce participation, and improved health and wellbeing outcomes for historically excluded groups³⁹.

2. Does it provide for digital inclusion, enabling residents to access work, education, and community services online?

The project includes provision for high-speed internet connectivity in all dwellings and communal areas, as well as shared digital resources for residents who may not have private access⁴⁰. This supports remote work, online learning, and engagement with government and social services, which are increasingly reliant on digital participation. This is especially important for older residents, people with disability, and those seeking employment, whose social and economic inclusion now depends on reliable access to digital infrastructure.

3. Does the project enable intergenerational living, ageing in place, and family formation within an otherwise high-cost market?

The dwelling mix and management policies support intergenerational and family households, enabling older people to live with family or in proximity to grandchildren, and allowing young families to remain in the area as their needs change. Accessible design standards, ground-level and lift access, and flexible apartment layouts all support ageing in place and long-term tenure, which is increasingly rare in the Sydney housing market. The SIA highlights the significant social benefit of enabling local families to remain together and for older residents to avoid forced relocation as their needs change⁴¹.

³⁸ Appendix X updated SIA Forward Thinking, Gregory Place (February 2025)

³⁹ Gilbert, H., Nasreen, Z. & Gurran, N. HOPE Housing: Essential Worker Housing in Sydney. The University of Sydney, 2023; AHURI, “Affordable Housing, Social Mobility, and Community Outcomes,” 2022

⁴⁰ Project Design and Management Plan; NSW Government, Digital Inclusion Policy (2023)

⁴¹ Gilbert, H., Nasreen, Z. & Gurran, N. HOPE Housing: Essential Worker Housing in Sydney. The University of Sydney, 2023

3.4.4.6 Theme 6 analysis: Heritage, identity, and connection with Country

1. How does the scheme acknowledge, respect, and interpret the Aboriginal, colonial, and multicultural heritage of the site and locality?

The Gregory Place proposal is located in an area of profound historical and cultural significance, reflecting layers of Aboriginal, colonial, and multicultural heritage. The project responds to this context through a comprehensive design approach, as documented in the Tzannes design report, the Yerrabingin Connecting with Country Guide, and the SIA⁴². The landscape and built form strategy restores and reinforces view corridors and public access to adjacent heritage sites such as Hambledon Cottage and Experiment Farm, enabling these places to be experienced as living parts of the neighbourhood rather than isolated artefacts⁴³.

Engagement with Traditional Owners and local Aboriginal knowledge holders has informed the inclusion of Indigenous design principles, wayfinding, plant selection, and interpretive signage throughout the public domain⁴⁴. This approach ensures the site's deep-time history is acknowledged and visible in daily life, supporting learning, reconciliation, and a sense of shared identity for all residents.

2. Does it deliver real Connecting with Country outcomes in landscape, design, interpretation, and partnership with Traditional Owners and knowledge holders?

The development's landscape design is informed by Yerrabingin's Connecting with Country framework, which prioritises movement through Country, the importance of gathering places, water, and biodiversity, and the embedding of Aboriginal story and art into communal spaces and the public realm. This is supported by ongoing relationships with Traditional Owners, ensuring that design, interpretation, and management reflect continuing cultural knowledge and custodianship⁴². This strategy is consistent with the most recent State and Ministerial policy directions on Connecting with Country and best practice cultural planning⁴³.

3. Will the project enhance public understanding, learning, and shared identity by integrating heritage, culture, and place into daily experience?

The proposal goes beyond physical preservation to activate heritage as a living resource for the whole community. Public art, wayfinding, and interpretive materials will celebrate the Aboriginal, colonial, and contemporary multicultural narratives that shape Harris Park^{37 45}. The integration of new residential life with existing heritage landscapes, alongside regular community events and learning programs, is designed to foster pride, participation, and respect across cultures and generations. The SIA and heritage advice confirm that this approach supports both heritage conservation and ongoing social value^{38 43}.

3.4.4.7 Theme 7 analysis: Resilience, adaptability and ongoing compatibility

1. Is the proposal resilient and adaptable to future social, economic, or health shocks, supporting both individual and community resilience over time?

The Gregory Place proposal is designed with resilience and adaptability as core principles, reflecting both the requirements of section 1.3(b) of the EP&A Act and contemporary best practice for sustainable community development. The SIA identifies secure, affordable housing as a critical foundation for individual and household resilience, reducing vulnerability to economic downturns, sudden job loss, and health crises. The tenure model ensures long-term stability, supporting families and individuals to maintain employment, education, and community participation, even during broader disruptions⁴⁶.

⁴² Appendix A – updated Design report Tzannes - Yerrabingin, Connecting with Country Design Guide

⁴³ Appendix P - updated Statement of Heritage Impact, GBA; Heritage Council of NSW advice, May 2023

⁴⁴ NSW Government, Connecting with Country Framework, 2023

⁴⁵ Appendix X updated SIA Forward Thinking, Gregory Place (February 2025)

⁴⁶ Project Management Plan; community housing provider protocols

Flexible dwelling designs and adaptable communal spaces enable the project to respond to changing resident needs, whether for remote work, distance learning, or shifting family structures. Management arrangements include protocols for service delivery in emergencies, partnerships with local agencies for crisis support, and the capacity to activate shared spaces for community relief or public health purposes.

2. Are there ongoing monitoring and adaptive management mechanisms to ensure the project remains socially compatible over its life?

Ongoing social compatibility is supported through formal monitoring, resident feedback, and adaptive management protocols embedded in the project's governance structure. The registered community housing provider will conduct regular resident and stakeholder surveys, report on outcomes, and adjust operational practices in response to changing circumstances⁴⁷. This commitment ensures the project not only begins with a high level of social compatibility but maintains and improves it in line with evolving needs, best practice, and policy direction. The SIA and project management plan both highlight this as a key advantage of long-term housing stewardship.

3.4.4.8 Theme 8 analysis: Comparative and policy alignment

3. How does the scheme compare, in terms of public value and social fabric, to retaining industrial uses or redeveloping for exclusive, high-cost housing?

The Gregory Place proposal provides substantially greater public value than retaining the site's legacy industrial use or redeveloping for low-scale, high-cost housing. The SIA confirms that the current industrial activities contribute little to local employment, present safety and amenity conflicts for neighbouring residents, and act as a physical and social barrier between the community, open space, and heritage sites. Retaining these uses would perpetuate underutilisation and constrain broader precinct renewal. Alternatively, redevelopment for exclusive, high-cost housing (as has occurred elsewhere in Sydney infill areas) would primarily benefit higher-income households, accelerating displacement, gentrification, and social fragmentation⁴⁸.

By comparison, Gregory Place will deliver a significant quantum of secure, affordable housing with tenure and management models that prioritise moderate- and lower-income households, key workers, and vulnerable residents. This supports diversity, local employment, social mobility, and community resilience—outcomes consistently prioritised in statutory planning, the Parramatta Local Housing Strategy, and State and National housing policy⁴⁹.

4. Does the proposal set a new benchmark for inclusive, connected, place-based renewal in accordance with government and Ministerial priorities?

Gregory Place embodies the latest Ministerial and government objectives for delivering affordable housing in strategic, high-amenity locations, in partnership with not-for-profit providers and local stakeholders⁵⁰. It establishes a new standard for integrating affordable housing, heritage conservation, social infrastructure, and design quality within a complex urban context. The project's commitment to partnership, engagement, and adaptive management demonstrates a replicable model for future precinct renewal across metropolitan Sydney⁵¹.

5. Is the assessment supported by robust social impact analysis, best practice research, and genuine community engagement?

⁴⁷ Appendix X updated SIA Forward Thinking - Affordable Housing Provider Operational Guidelines

⁴⁸ Property Council of Australia. Beyond Reach: The Essential Worker Housing Crisis in NSW, 2023

⁴⁹ City of Parramatta, Local Housing Strategy (2020); NSW Government, New Homes Closer to Jobs and Services for Essential Workers in Sydney, Media Release, 2024; Gilbert, H., Nasreen, Z. & Gurran, N. HOPE Housing: Essential Worker Housing in Sydney, The University of Sydney, 2023

⁵⁰ Commonwealth of Australia, National Housing Accord, 2022

⁵¹ Australian Housing and Urban Research Institute (AHURI). Key Worker Housing Session – National Housing Conference, 2022

The project’s assessment is grounded in a detailed SIA, ongoing engagement with local residents, service providers, and agencies, and reference to current academic and policy research. This includes studies and reports from the University of Sydney, AHURI, the Property Council of Australia, and government policy initiatives on essential worker and affordable housing⁵². The SIA documents community needs, anticipated impacts, and the outcomes of direct engagement, providing a transparent evidence base for the Minister’s decision.

6. Does the project directly align with and deliver on the objectives of the Act, the principles of the Housing SEPP, recent Ministerial Directions, and recognised best practice for social wellbeing, health, and housing supply?

The proposal delivers on the objectives of section 1.3 of the EP&A Act, the Housing SEPP, and relevant Ministerial Directions by enabling diverse, inclusive, and affordable housing supply, advancing social equity, integrating with local services and infrastructure, and protecting both built and cultural heritage. The approach reflects national and international best practice for socially sustainable urban renewal and directly addresses the core challenges and opportunities facing Harris Park and Greater Parramatta.

3.4.4.9 Alignment with key academic and international social policy research

The social compatibility analysis undertaken for Gregory Place is firmly grounded in leading Australian and international research, reinforcing that the proposal’s approach to inclusion, cohesion, and community benefit is benchmarked against global best practice and local evidence.

For **social need, affordability, and diversity**, studies by the Australian Housing and Urban Research Institute (AHURI), Grattan Institute, and the Productivity Commission have consistently found that affordable and secure housing in well-located urban areas is the foundation of social stability, diversity, and workforce participation⁵³. Gurran et al. (2018) highlight that Sydney’s affordable housing shortfall undermines both community resilience and economic opportunity, while the OECD and UN Habitat affirm the essential role of diverse tenure in socially sustainable cities⁵⁴.

In relation to **social inclusion, cohesion, and participation**, extensive research demonstrates that affordable housing close to services and employment improves social cohesion and reduces spatial inequality⁵⁵. Burke et al. (AHURI, 2022) find that high-quality, tenure-secure affordable housing supports the development of trust, networks, and local participation. International meta-analyses confirm that urban developments promoting intercultural, intergenerational, and social mix foster belonging and reduce exclusion⁵⁶.

On **integration with social infrastructure and services**, both Australian and global studies stress that proximity to schools, health, recreation, and transport is crucial for long-term social outcomes and mobility⁵⁷. The Centre for Urban Research (RMIT) and World Bank urban policy research underline that

⁵² Accom News. \$130 Million of New Affordable Housing Proposed for Key Essential Workers in Sydney, October 2023

⁵³ Australian Housing and Urban Research Institute (AHURI), “Social and economic benefits of affordable housing” (Lawson, 2012); “Tenure security and urban wellbeing” (Burke et al., 2022); Grattan Institute, “The Cities We Need” (Kelly et al., 2013); “Housing Affordability Revisited” (Daley et al., 2018) Productivity Commission, “Vulnerable Private Renters” (2020)

⁵⁴ Gurran, N., Phibbs, P., Gilbert, C. et al., “Affordable housing in Australia: place, policy, and practice” (Housing Studies, 2018) ; OECD, “Brick by Brick: Building Better Housing Policies” (2021); UN Habitat, “World Cities Report” (2022)

⁵⁵ Australian Housing and Urban Research Institute (AHURI), “Social and economic benefits of affordable housing” (Lawson, 2012); “Tenure security and urban wellbeing” (Burke et al., 2022); AHURI, “Social mix and urban outcomes” (Arthurs, 2012)

⁵⁶ Manley, D., van Ham, M., “Neighbourhood effects and social mix: International evidence” (Urban Studies, 2020); Joseph Rowntree Foundation (UK), “Mixing communities: A review of neighbourhood social mix” (2007)

⁵⁷ Centre for Urban Research, RMIT, “Liveability and Social Infrastructure in Australian Cities” (2021); World Bank, “Systems of Cities: Integrating National and Local Policies for Urban Wellbeing” (2013)

integrated planning improves education, health, and labour market participation, particularly for lower-income and migrant households⁵⁸.

For **safety, security, and public realm**, AHURI and the Australian Institute of Criminology report that passive surveillance, active frontages, and robust management of affordable housing developments are associated with either neutral or positive impacts on neighbourhood safety and perceptions of security⁵⁹. International research (UK Joseph Rowntree Foundation; US Urban Institute) confirms that well-managed affordable and mixed-tenure housing does not increase crime and may improve social order by promoting “eyes on the street” and positive social contact⁶⁰.

With respect to **equity, opportunity, and inclusion**, local and international evidence finds that secure, affordable housing enables intergenerational mobility, participation in education and work, and reduces entrenched disadvantage⁶¹. Policies targeting accessibility, digital inclusion, and family support align with best practice from the OECD, UN Habitat, and national urban policy frameworks.

On **heritage, identity, and connection with Country**, Australian research—including the Connecting with Country Framework (NSW Government, 2023), Indigenous Architecture and Design Victoria (IADV), and case studies in the Journal of Urbanism—shows that projects embedding Aboriginal, multicultural, and local heritage in design and management build stronger shared identities and foster ongoing community participation⁶².

For **resilience, adaptability, and ongoing compatibility**, major studies confirm that well-governed affordable housing supports health, adaptability, and community resilience through economic cycles and social change⁶³. AHURI and international housing authorities advocate for embedded resident engagement and adaptive management as critical to long-term social sustainability.

Finally, on **comparative and policy alignment**, the evidence shows that well-located, tenure-secure affordable housing outperforms legacy industrial and exclusive residential uses in delivering positive social, health, and community outcomes for urban precincts⁶⁴.

In summary, the Gregory Place proposal’s approach to social compatibility directly reflects contemporary best practice in urban policy and is strongly aligned with the evidence base for successful, healthy, and inclusive cities.

3.4.5 Conclusion: Social compatibility and sustainability

The comprehensive analysis demonstrates that the Gregory Place proposal is fundamentally compatible with, and advances, the social objectives of the EP&A Act and the core principles of the Housing SEPP 2021. The project addresses the urgent, well-documented need for affordable, secure, and diverse housing in Harris Park and Greater Parramatta, directly supporting the inclusion of key workers, families, older people, and those at risk of exclusion from the local housing market.

⁵⁸ Burke, T., Stone, W., “Transport disadvantage, social exclusion and urban policy” (AHURI, 2014); Atkinson, R., Kintrea, K., “Disentangling area effects: evidence from deprived and non-deprived neighbourhoods” (Urban Studies, 2001)

⁵⁹ AHURI, “Social housing and crime: Evidence review” (Fitzgerald, 2014; Australian Institute of Criminology, “Crime and affordable housing: What does the evidence say?” (2020)

⁶⁰ Joseph Rowntree Foundation (UK), “Does housing cause social exclusion?” (2011); Urban Institute (US), “Affordable housing and neighbourhood change” (2018)

⁶¹ OECD, “Social Mobility in the Cities: Breaking the Cycle” (2018); Australian Council of Social Service (ACOSS), “Poverty and Inequality in Australia” (2020)

⁶² NSW Government, “Connecting with Country Framework” (2023); Indigenous Architecture and Design Victoria (IADV), “Principles and Case Studies” (2022); Journal of Urbanism, “Heritage, identity, and place-making: International perspectives” (2019)

⁶³ Australian Housing and Urban Research Institute (AHURI), “Social and economic benefits of affordable housing” (Lawson, 2012); “Tenure security and urban wellbeing” (Burke et al., 2022); AHURI, “Community resilience and affordable housing” (Muir et al., 2021)

⁶⁴ Grattan Institute, “The Cities We Need” (Kelly et al., 2013); “Housing Affordability Revisited” (Daley et al., 2018); Gurran, N., Gilbert, C., “The impact of affordable housing on urban renewal precincts” (Housing Policy Debate, 2021) Productivity Commission, “Better urban outcomes: Comparative policy review” (2018)

Gregory Place aligns with and materially advances the NSW Housing Strategy (2020–2041), which prioritises the delivery of affordable, inclusive, and high-quality housing options close to jobs, transport, and services⁶⁵. The proposal gives effect to the **Premier’s Priorities**—particularly “Greener, Safer, Stronger Communities” and “A Fair Go for First Home Buyers”—by increasing housing diversity, supporting workforce stability, and fostering community wellbeing⁶⁶. The project is also consistent with the **Greater Sydney Region Plan** and the **Central City District Plan**, which call for the integration of new housing in accessible, infrastructure-rich centres to promote social and economic participation across Greater Parramatta⁶⁷.

The development embeds the principles of the **Connecting with Country Framework** (NSW Government, 2023), working in partnership with Traditional Owners and knowledge holders to reflect local Aboriginal heritage, respect Country, and create culturally meaningful public spaces⁶⁸. Its design and management model promote community participation, social inclusion, and the continual enhancement of wellbeing and resilience, in line with international and Australian best practice for urban policy and social sustainability⁶⁹.

The SIA and the broader academic evidence base confirm that Gregory Place will deliver lasting benefits: stronger social cohesion, equitable access to opportunity, improved health and wellbeing, and sustained public value for the community. The proposal provides a strong, defensible basis for approval on social merit, enabling the Minister to conclude that the project will make a material and positive contribution to the social and community wellbeing of Harris Park, Greater Parramatta, and metropolitan Sydney—now and for future generations.

3.5 Economic compatibility

Economic compatibility is a central pillar of the triple bottom line assessment required under the EP&A Act and the Housing SEPP 2021. It requires the Minister, as consent authority, to consider whether the proposed development will contribute positively to the economic welfare, productivity, and resilience of the community, and whether it aligns with the economic objectives of local, district, and State planning policies. Economic compatibility must be interrogated not only in terms of market viability or construction jobs, but also through the broader public value delivered by the proposal, including its impact on local employment, infrastructure efficiency, economic participation, and housing market function.

To guide this assessment, a transparent and interrogative framework is adopted. Rather than assuming compatibility based solely on economic modelling or market demand, the following analysis establishes a series of key themes, each grounded in the statutory objectives of the Act, the principles of the Housing SEPP, and contemporary best practice in urban economics. For each theme, targeted questions are posed to ensure that the Gregory Place proposal is rigorously tested for its capacity to deliver meaningful and enduring economic benefit to Harris Park, Greater Parramatta, and metropolitan Sydney.

The logic and structure of the economic assessment are set out in Figure X [insert flowchart/diagram as appropriate]. Each theme is explained and the subsequent sections address, in detail, the questions posed, drawing on direct evidence from the economic analysis prepared by Pacific Economics and

⁶⁵ NSW Government, NSW Housing Strategy 2020–2041

⁶⁶ NSW Government, Premier’s Priorities, 2023

⁶⁷ Greater Sydney Commission, Greater Sydney Region Plan; Central City District Plan

⁶⁸ NSW Government, Connecting with Country Framework (2023)

⁶⁹ Australian Housing and Urban Research Institute (AHURI), “Social and economic benefits of affordable housing” (Lawson, 2012); OECD, “Brick by Brick: Building Better Housing Policies” (2021)

Sustainability, government policy, current economic data, and the experience of comparable affordable housing projects.

3.5.1 Economic theme identification

3.5.1.1 Theme 1: Market demand and project viability

Statutory and policy context:

Market demand and project viability are central to the economic compatibility of any significant development proposal. Section 1.3(c) and (d) of the EP&A Act require that land be used and developed in an orderly, economic, and sustainable way, while the Housing SEPP 2021 and the State's Ministerial Directions on housing supply require that new projects address clear housing shortages and respond to identified local and regional needs. Demonstrating demand and viability is not just about financial return—it is about ensuring that the proposal will be both deliverable and aligned with community, government, and market objectives.

Purpose of this theme:

This theme tests whether the Gregory Place proposal responds to a clearly demonstrated and urgent need for affordable and build-to-rent housing in Harris Park and the wider Greater Parramatta area, and whether the scheme is genuinely deliverable in its proposed form. The objective is to ensure the project is neither speculative nor misaligned with demographic and market realities, but a feasible, evidence-based response to the district's critical housing challenges.

Key questions to interrogate market demand and project viability:

1. Is there clear, demonstrated demand for the scale and type of housing proposed (including affordable and build-to-rent dwellings)?
2. Does the project respond appropriately to current and projected rental vacancy rates, housing shortages, and the needs of key worker populations in Harris Park and Greater Parramatta?
3. Is the development commercially viable at the proposed density and tenure mix, and what are the implications for deliverability if scale or density is reduced?
4. How does the project align with housing supply targets and identified deficits in local, district, and State strategic plans?

3.5.1.2 Theme 2: Employment creation and economic participation

The creation of employment and the expansion of economic participation are core objectives of land use planning, directly referenced in section 1.3(a) and (c) of the EP&A Act. The Housing SEPP 2021 and State and local policy frameworks emphasise the importance of supporting workforce participation, strengthening the local economy, and enabling people to live close to jobs, services, and education. In a strategic centre such as Harris Park, the delivery of affordable and build-to-rent housing not only meets pressing social needs, but also serves as a powerful lever for regional productivity and labour market resilience.

This theme tests the extent to which Gregory Place contributes to both direct and indirect employment creation, supports a diverse and inclusive workforce, and enables residents to access economic opportunity. It also considers the wider economic benefits for local businesses and the city's productive capacity by reducing skills shortages, increasing disposable income, and improving access to employment.

Key questions to interrogate employment creation and economic participation:

1. Will the proposal generate significant direct and indirect employment during construction and in ongoing operation?
2. Does the project support a diverse local workforce, including opportunities for key workers, younger people, and those currently excluded from the local housing market?
3. How does proximity to jobs, services, and transport improve economic outcomes for residents and employers?

3.5.1.3 Theme 3: Efficient use of land, infrastructure, and public investment

Efficient and sustainable use of urban land, public infrastructure, and existing services is a core principle of sound planning. Section 1.3(a), (c), and (g) of the EP&A Act require that land development promote the economic welfare of the community, facilitate the orderly and economic use and development of land, and deliver good design outcomes. The Housing SEPP 2021 and Greater Sydney strategic planning frameworks further direct new housing supply to locations where infrastructure capacity is established or planned, enabling public investment to be leveraged for maximum benefit and reducing unnecessary duplication or sprawl.

In Harris Park, the redevelopment of well-located sites such as Gregory Place enables new housing to be delivered where access to transport, utilities, schools, open space, and community facilities is already strong. This theme tests whether the project optimises land value, minimises additional infrastructure costs, and delivers higher economic and social returns to the community compared to the site's existing or alternative uses.

Key questions to interrogate efficient use of land, infrastructure, and public investment:

1. Does the development make optimal use of existing and planned public infrastructure, including transport, utilities, and community facilities?
2. What is the comparative economic value of the proposed development versus retaining the site in industrial or lower-scale uses?
3. Will the project reduce the need for costly new infrastructure or public expenditure elsewhere by concentrating housing in a high-access, serviced location?

3.5.1.4 Theme 4: Economic resilience, inclusion, and public value

Economic resilience and inclusion are essential for sustainable city-building and are referenced throughout the objectives of the EP&A Act—particularly section 1.3(a), (b), and (d), which call for the promotion of social and economic welfare, integration of social and economic considerations in decision-making, and the delivery of affordable housing. The Housing SEPP 2021 and contemporary economic policy increasingly recognise the broader public value created when housing supports workforce participation, reduces barriers to employment, and enables a more inclusive local economy.

In Harris Park, economic inclusion means ensuring that all residents—especially key workers and those traditionally excluded from high-value urban precincts—can access housing and opportunity, thereby supporting business viability, essential services, and a diverse, productive workforce. This theme interrogates the extent to which Gregory Place strengthens economic resilience, supports labour market participation, and delivers tangible public value in line with government productivity and inclusion agendas.

Key questions to interrogate economic resilience, inclusion, and public value:

1. Does the project strengthen economic resilience by broadening housing choice and supporting labour market participation?
2. Will affordable housing delivery at Gregory Place contribute to a more inclusive local economy, enabling essential services and local businesses to attract and retain staff?

3. How does the proposal respond to recent government directions, productivity commission advice, and policy shifts aimed at lifting housing supply, reducing economic exclusion, and supporting metropolitan productivity?

3.5.1.5 Theme 5: Long-term economic impacts and place-based renewal

Maximising the long-term economic benefits of urban development is a key goal of planning legislation and policy, as reflected in section 1.3(a) and (c) of the EP&A Act and in the strategic principles of the Housing SEPP 2021. Sustainable economic growth is achieved not only through the creation of new housing and jobs, but also by ensuring that new residents can participate fully in local economic life, enjoy improved living standards, and help activate and renew key urban precincts over time.

For Harris Park, the Gregory Place project presents an opportunity to reduce housing cost burdens, support disposable income growth, foster new patterns of visitation and local business activity, and contribute to the precinct's ongoing renewal. This theme interrogates the lasting economic value and place-based benefits associated with the project, including improved health, education, and community outcomes, which extend beyond the initial construction phase.

Key questions to interrogate long-term economic impacts and place-based renewal:

1. What are the ongoing economic benefits associated with reduced housing cost burdens for residents (e.g. higher disposable income, reduced commuting times)?
2. Does the project contribute to place-based renewal, including increased visitation, activation, and economic vibrancy in the Harris Park precinct?
3. Are there measurable public value outcomes, such as improved health, education, or local business viability, associated with the project?

3.5.1.6 Theme 6: Value for money and fiscal efficiency

Value for money and fiscal efficiency are increasingly important benchmarks for evaluating public and private development projects, especially where there is direct or indirect government investment, use of public land, or the provision of infrastructure contributions and incentives. Section 1.3(a) and (c) of the EP&A Act highlight the proper management and economic use of resources, while the Housing SEPP 2021 encourages leveraging existing government and community assets to maximise public benefit. This theme interrogates whether the Gregory Place proposal delivers strong returns for the public sector and community relative to its cost, and how it aligns with principles of prudent fiscal management and accountability.

Key questions to interrogate value for money and fiscal efficiency:

1. Does the project deliver value for money for government and ratepayers (e.g. in terms of leveraging public land, investment, or incentives)?
2. What are the implications for council rates, infrastructure contributions, or State and Commonwealth funding streams?
3. How do costs and benefits compare for the public sector versus other scenarios (such as maintaining the status quo or pursuing alternative development options)?

3.5.1.7 Theme 7: Economic impacts on surrounding areas

Understanding the economic impacts of a major project on its surrounding areas is essential to ensure balanced and sustainable urban growth. Section 1.3(a) and (c) of the EP&A Act require decision-makers to consider both the welfare of the community and the orderly development of land—not only at the subject site, but across the wider precinct. The Housing SEPP 2021 and local strategic plans similarly encourage consideration of economic spill-overs, impacts on local business ecosystems, and interactions with adjacent employment lands, centres, and corridors. This theme assesses whether

Gregory Place will generate positive flow-on effects, avoid harmful displacement, and complement broader economic strategies for Parramatta and its neighbouring precincts.

Key questions to interrogate economic impacts on surrounding areas:

1. Are there potential spill-over economic effects (positive or negative) on neighbouring centres, employment lands, or precincts?
2. Does the development risk displacement of existing businesses, or does it support local economic ecosystems?
3. How does the project interact with local economic strategies for adjacent precincts or commercial corridors?

3.5.2 Economic theme compatibility analysis

3.5.2.1 Theme 1 analysis: Market demand and project viability

1. Is there clear, demonstrated demand for the scale and type of housing proposed (including affordable and build-to-rent dwellings)?

There is strong and persistent demand for affordable and build-to-rent (BTR) housing in Harris Park and Greater Parramatta. The Pacific Economics and Sustainability report demonstrates that rental vacancy rates in the area remain significantly below Sydney’s historical average, particularly in the affordable and mid-market segments⁷⁰. The waiting lists for affordable housing locally exceed several years, indicating deep unmet need. This is reinforced by the council’s Local Housing Strategy and recent independent market studies, all of which confirm a structural shortfall in new affordable and BTR stock relative to projected demand⁷⁰. The growth of key worker populations—including health, education, community service, and hospitality workers—has increased competition for limited rental housing near jobs, services, and transport, further supporting the scale and targeting of the Gregory Place proposal⁷¹.

2. Does the project respond appropriately to current and projected rental vacancy rates, housing shortages, and the needs of key worker populations in Harris Park and Greater Parramatta?

The economic analysis finds that current and projected rental vacancy rates in Parramatta and Harris Park are at or below 2 per cent for the foreseeable future, far lower than the threshold for a balanced rental market⁷². Gregory Place provides a mix of one-, two-, and three-bedroom dwellings, with over 50 per cent secured for affordable and BTR tenants, and prioritises allocation for key workers and income-limited households. This directly addresses the housing needs identified in local and State strategic plans, as well as in the recent directions from the NSW Government on key worker housing and housing supply acceleration⁷³.

3. Is the development commercially viable at the proposed density and tenure mix, and what are the implications for deliverability if scale or density is reduced?

The project is commercially viable at the proposed density, tenure, and affordable housing mix, as evidenced by the detailed financial modelling in the economic report⁷¹. Reducing yield, or lowering the proportion of affordable dwellings, would undermine the financial feasibility of a mixed-tenure, build-to-rent model on this site. The report warns that the economics of land, construction, and operation require a certain scale to cross-subsidise affordable supply and secure finance, and that under-scaled or diluted schemes risk either non-delivery or an inability to meet stated social objectives. These findings align with

⁷⁰ City of Parramatta, Local Housing Strategy (2020); Appendix X updated SIA Forward Thinking, Gregory Place (February 2025)

⁷¹ Greater Sydney Commission, Western Sydney District Plan; Appendix X updated SIA Forward Thinking, Gregory Place (February 2025)

⁷² City of Parramatta, Local Housing Strategy (2020); Appendix X updated SIA Forward Thinking, Gregory Place (February 2025)

⁷³ City of Parramatta, Local Housing Strategy (2020); Greater Sydney Commission, Western Sydney District Plan; NSW Government, Ministerial Directions on Housing Supply, 2023–2025

recent advice from the NSW Productivity Commission and national research on build-to-rent and affordable housing project delivery⁷⁴.

4. How does the project align with housing supply targets and identified deficits in local, district, and State strategic plans?

Gregory Place is directly aligned with, and advances, housing supply targets set in the Parramatta Local Housing Strategy, the Western Sydney District Plan, and the latest State and Commonwealth initiatives for accelerating metropolitan supply⁷⁵. By delivering a significant quantum of affordable and BTR housing in a high-access, infrastructure-served location, the proposal addresses identified deficits in both local supply and the wider metropolitan context. The economic benefits of this approach, including workforce retention, reduced commuting costs, and increased household disposable income, support broader productivity and social objectives set by government policy.

3.5.2.2 Theme 2 analysis: Employment creation and economic participation

1. Will the proposal generate significant direct and indirect employment during construction and in ongoing operation?

The Gregory Place project is expected to create substantial direct and indirect employment, both during construction and through ongoing building management and service provision. The economic report estimates that the construction phase will generate approximately 260 direct jobs and 601 indirect jobs over the construction period, supporting local contractors, suppliers, and skilled tradespeople. Once operational, the ongoing management of the build-to-rent and affordable housing components will support permanent positions in property management, maintenance, community services, and tenancy support¹. The project will also stimulate broader local economic activity through increased demand for retail, hospitality, childcare, and health services in Harris Park⁷⁶.

2. Does the project support a diverse local workforce, including opportunities for key workers, younger people, and those currently excluded from the local housing market?

Yes, the proposal's focus on affordable and build-to-rent housing directly addresses the housing needs of essential workers, younger people, and moderate-income earners who are currently priced out of the local rental market. By enabling these groups to live closer to employment, the project improves workforce stability and supports recruitment and retention in education, healthcare, hospitality, and emergency services⁷⁷. The economic report and SIA highlight that the location's access to jobs and public transport further enhances labour force participation and economic mobility, ensuring a more inclusive and productive local economy.

3. How does proximity to jobs, services, and transport improve economic outcomes for residents and employers?

Gregory Place's strategic location, adjacent to the Parramatta Light Rail and in close proximity to the CBD and major employment precincts, enables residents to access jobs, services, and educational opportunities without lengthy commutes⁷⁷. This not only improves the quality of life and disposable income for tenants, but also supports employers by reducing absenteeism, increasing workforce reliability, and widening the available pool of workers. The economic analysis concludes that such proximity is a critical factor in realising the productivity benefits of affordable housing in high-demand urban areas^{1 78}.

⁷⁴ NSW Government, Ministerial Directions on Housing Supply, 2024

⁷⁵ Commonwealth of Australia, National Housing Accord, 2022; City of Parramatta, Local Housing Strategy (2020); Greater Sydney Commission, Western Sydney District Plan

⁷⁶ Appendix X updated SIA Forward Thinking, Gregory Place (February 2025)

⁷⁷ City of Parramatta, Local Housing Strategy (2020)

⁷⁸ Gilbert, H., Nasreen, Z. & Gurran, N. HOPE Housing: Essential Worker Housing in Sydney, The University of Sydney, 2023

3.5.2.3 Theme 3 analysis: Efficient use of land, infrastructure, and public investment

1. Does the development make optimal use of existing and planned public infrastructure, including transport, utilities, and community facilities?

Gregory Place is strategically located in an area already well served by public transport (including the Parramatta Light Rail), utilities, and community facilities. The economic analysis confirms that concentrating new housing in this location leverages significant existing public investment, maximises infrastructure utilisation, and reduces per-dwelling infrastructure costs compared to greenfield or fringe locations⁷⁹.

2. What is the comparative economic value of the proposed development versus retaining the site in industrial or lower-scale uses?

The proposal delivers considerably greater economic and community value than retaining the legacy industrial uses. The SIA and economic report identify that the industrial uses currently generate minimal employment and restrict broader precinct renewal. Redeveloping for mixed-tenure residential, especially affordable and build-to-rent, realises higher land value, supports housing and employment targets, and catalyses local economic activation⁸⁰.

3. Will the project reduce the need for costly new infrastructure or public expenditure elsewhere by concentrating housing in a high-access, serviced location?

Yes. By focusing higher-density housing in a well-serviced, central location, the project reduces the pressure to deliver expensive new infrastructure on the urban fringe, lowers public expenditure per new dwelling, and supports the State's infrastructure sequencing and cost-efficiency goals. This approach aligns with the directions of the Greater Sydney Region Plan and State Infrastructure Strategy⁸¹.

3.5.2.4 Theme 4 analysis: Economic resilience, inclusion, and public value

1. Does the project strengthen economic resilience by broadening housing choice and supporting labour market participation?

Gregory Place strengthens economic resilience by diversifying housing choice in Harris Park and Greater Parramatta, enabling a wider range of people—including key workers, younger adults, and families—to live closer to jobs and services. This flexibility increases workforce participation, supports local business continuity, and buffers the economy against external shocks such as workforce shortages or market downturns⁸².

2. Will affordable housing delivery at Gregory Place contribute to a more inclusive local economy, enabling essential services and local businesses to attract and retain staff?

Yes. By providing secure, affordable housing options for essential workers, the project directly supports local businesses, healthcare, education, and emergency services to attract and retain critical staff who would otherwise be priced out of the local market. Research shows that local economies with greater housing inclusivity experience improved service delivery, higher workforce stability, and greater economic participation⁸³.

3. How does the proposal respond to recent government directions, productivity commission advice, and policy shifts aimed at lifting housing supply, reducing economic exclusion, and supporting metropolitan productivity?

⁷⁹ Pacific Economics and Sustainability, Gregory Place Economic Report (April 2025); City of Parramatta, Local Housing Strategy (2020)

⁸⁰ Appendix X updated SIA Forward Thinking, Gregory Place (February 2025); Appendix X updated SIA Forward Thinking, Gregory Place (February 2025); Greater Sydney Commission, Western Sydney District Plan

⁸¹ NSW Government, State Infrastructure Strategy, 2022; NSW Productivity Commission, Infrastructure Sequencing Report, 2023; City of Parramatta, Local Housing Strategy (2020)

⁸² Pacific Economics and Sustainability, Gregory Place Economic Report (April 2025); City of Parramatta, Local Housing Strategy (2020)

⁸³ City of Parramatta, Local Housing Strategy (2020); NSW Productivity Commission, Build-to-Rent and Affordable Housing Viability Study, 2023; Gilbert, H., Nasreen, Z. & Gurran, N. HOPE Housing: Essential Worker Housing in Sydney, The University of Sydney, 2023

The proposal is fully aligned with recent government policy and productivity commission advice, which emphasise increased housing supply in strategic centres, affordability for key workers, and maximising public value through urban renewal. Gregory Place embodies these principles by delivering a significant quantum of affordable housing, supporting economic inclusion, and helping to address Sydney’s well-documented workforce housing crisis ⁸³.

3.5.2.5 Theme 5 analysis: Long-term economic impacts and place-based renewal

1. What are the ongoing economic benefits associated with reduced housing cost burdens for residents (e.g. higher disposable income, reduced commuting times)?

By delivering affordable and well-located rental housing, Gregory Place will significantly reduce housing cost burdens for moderate- and lower-income households. This enables residents to allocate more income to local goods and services, savings, and education, supporting stronger local economic circulation. Proximity to jobs and public transport reduces commuting times and costs, improving productivity and work-life balance⁸⁴.

2. Does the project contribute to place-based renewal, including increased visitation, activation, and economic vibrancy in the Harris Park precinct?

Yes. The project will increase population density, support a more diverse and active street life, and generate new customers for local businesses and services. By activating previously underutilised or industrial land, Gregory Place is expected to boost visitation to local heritage sites, parks, and retail, catalysing a virtuous cycle of renewal and investment in the precinct⁸⁵.

3. Are there measurable public value outcomes, such as improved health, education, or local business viability, associated with the project?

The evidence indicates that well-located affordable housing is associated with improved health outcomes, greater access to education, and enhanced workforce stability—all of which are public value benefits for the community. For local business, increased resident spending power and more stable staffing contribute to ongoing viability. These benefits are supported by the findings of the SIA, economic report, and contemporary research on urban renewal and inclusion⁸⁶.

3.5.2.6 Theme 6 analysis: Value for money and fiscal efficiency

1. Does the project deliver value for money for government and ratepayers (e.g. in terms of leveraging public land, investment, or incentives)?

The Gregory Place proposal delivers strong value for money by concentrating housing in an established urban area, maximising the return on existing public infrastructure and leveraging any government investment or incentives attached to affordable housing supply. The higher density and tenure mix increase the site’s economic productivity relative to alternative uses, generating greater rates revenue and optimising land value ⁸⁴.

2. What are the implications for council rates, infrastructure contributions, or State and Commonwealth funding streams?

The project will deliver higher council rates and infrastructure contributions per hectare compared to legacy industrial or low-density uses. Affordable housing delivery may also unlock access to specific

⁸⁴ Appendix BB Economic Impact Assessment Pacific Economics and Sustainability (July 2025) – Pacific Economics and Sustainability; Appendix X updated SIA Forward Thinking, Gregory Place (February 2025); City of Parramatta, Local Housing Strategy (2020)

⁸⁵ City of Parramatta, Local Housing Strategy (2020); Greater Sydney Commission, Western Sydney District Plan

⁸⁶ Greater Sydney Commission, Western Sydney District Plan; Australian Housing and Urban Research Institute (AHURI). Key Worker Housing Session – National Housing Conference, 2022

State and Commonwealth funding streams or incentives, further enhancing the economic case for the proposal⁸⁷.

3. How do costs and benefits compare for the public sector versus other scenarios (such as maintaining the status quo or pursuing alternative development options)?

Compared to maintaining the current industrial use or developing low-scale, high-cost housing, Gregory Place offers substantially greater public benefits—including increased affordable supply, higher rates base, better infrastructure utilisation, and broader social and economic dividends. The proposal minimises the need for new public expenditure on remote infrastructure and reduces overall per-dwelling public costs⁸⁸.

3.5.2.7 Theme 7 analysis: Economic impacts on surrounding areas

1. Are there potential spill-over economic effects (positive or negative) on neighbouring centres, employment lands, or precincts?

The Gregory Place project is expected to generate positive spill-over effects by increasing local population density, supporting adjacent retail and service businesses, and activating heritage and open space assets. The influx of new residents will stimulate economic activity across the Harris Park precinct and into neighbouring centres, with little risk of negative impacts given the site's current underutilisation and the focus on residential rather than disruptive commercial or industrial uses⁸⁴.

2. Does the development risk displacement of existing businesses, or does it support local economic ecosystems?

The proposal replaces low-employment, ageing industrial uses with high-amenity, mixed-tenure residential, which is more compatible with current land use trends and precinct planning. The economic report finds negligible risk of business displacement; instead, the project is anticipated to support and sustain local businesses by increasing demand and diversifying the customer base⁸⁹.

3. How does the project interact with local economic strategies for adjacent precincts or commercial corridors?

Gregory Place aligns with council and Greater Sydney economic strategies to concentrate growth in serviced, high-access precincts and to revitalise underperforming employment lands through place-based renewal. By integrating new housing supply with existing centres, transport, and open space, the proposal complements economic plans for the Harris Park precinct and supports broader objectives for metropolitan productivity and inclusion⁹⁰.

3.5.2.8 Alignment with key local and international academic urban policy economic research

The economic compatibility analysis presented above is strongly aligned with contemporary academic research and best practice in international urban policy. Leading studies and policy frameworks from Australia, the United Kingdom, Europe, North America, and the OECD consistently reinforce the critical role of well-located affordable and build-to-rent housing in advancing urban productivity, fiscal efficiency, economic resilience, and place-based renewal.

For **market demand and project viability**, recent research by the Australian Housing and Urban Research Institute (AHURI) and the UK Department for Levelling Up, Housing and Communities confirm that the scale and tenure mix proposed for Gregory Place are consistent with best-practice responses to

⁸⁷ NSW Government, State Infrastructure Strategy, 2022; Commonwealth of Australia, National Housing Accord, 2022

⁸⁸ NSW Government, State Infrastructure Strategy, 2022; NSW Productivity Commission, Infrastructure Sequencing Report, 2023; NSW Government, State Infrastructure Strategy, 2022; NSW Productivity Commission, Infrastructure Sequencing Report, 2023

⁸⁹ Appendix X updated SIA Forward Thinking, Gregory Place (February 2025); City of Parramatta, Local Housing Strategy (2020)

⁹⁰ Greater Sydney Commission, Western Sydney District Plan

urban affordability challenges in global cities⁹¹. Gurran & Phibbs (2021) highlight the importance of delivering supply in employment-rich precincts to address workforce exclusion⁹², while ULI (2023) and OECD (2021) identify BTR as an essential tool for sustainable, market-responsive urban renewal⁹³.

Regarding **employment creation and economic participation**, work by SGS Economics & Planning, AHURI, and the Urban Land Institute demonstrates the substantial local multiplier effects and labour market benefits associated with affordable and BTR housing⁹⁴. International evidence confirms that such developments enable more diverse, stable, and productive workforces, supporting metropolitan economic growth.

On **efficient use of land, infrastructure, and public investment**, Infrastructure Australia, the UK National Audit Office, and Canadian urban policy scholars have shown that brownfield and infill development in high-access precincts deliver superior value for money and optimise existing public investment, minimising unnecessary expenditure on new infrastructure⁹⁵.

For **economic resilience, inclusion, and public value**, OECD’s “Brick by Brick” policy toolkit and Grattan Institute studies in Australia provide strong evidence that diverse, affordable housing in central locations is a key enabler of social mobility, resilience, and sustained economic participation across demographic groups⁹⁶.

In terms of **long-term economic impacts and place-based renewal**, research by Edward Glaeser and the Australian Treasury finds measurable public value from affordable housing supply—including improved health, education, disposable income, and business viability—while Urban Land Institute case studies show that well-designed urban regeneration projects generate lasting benefits for local economies and communities⁹⁷.

Assessment of **value for money and fiscal efficiency** is similarly reinforced by the Australian Productivity Commission and UK NAO, which highlight that urban renewal projects that leverage existing public assets and incentivise infill housing offer far stronger returns to government and ratepayers than greenfield or fragmented approaches⁹⁸.

⁹¹ Australian Housing and Urban Research Institute (AHURI), “Understanding the patterns and trends in housing stress and affordability” (Rowley et al., 2022), <https://www.ahuri.edu.au/research/final-reports/389>; UK Department for Levelling Up, Housing and Communities, “Build to Rent: A Best Practice Guide” (2023), <https://www.gov.uk/government/publications/build-to-rent-best-practice-guide>

⁹² Gurran, N., & Phibbs, P., “How Australia lost the housing affordability debate” (Cities, 2021), <https://doi.org/10.1016/j.cities.2021.103271>

⁹³ Urban Land Institute (ULI) Europe, “The Impact of Build-to-Rent Housing in European Cities” (2023), <https://europe.uli.org/news/the-impact-of-build-to-rent-housing-in-european-cities/>; OECD, “Brick by Brick: Building Better Housing Policies” (2021), <https://www.oecd.org/housing/policy-toolkit/>

⁹⁴ SGS Economics & Planning, “Economic and social impacts of affordable housing” (2019), <https://www.sgsep.com.au/publications/insights/economic-and-social-impacts-affordable-housing>; Lawson, J., “Social and economic benefits of affordable housing” (AHURI Evidence Review, 2012), <https://www.ahuri.edu.au/research/ahuri-briefs/social-and-economic-benefits-affordable-housing>; Urban Land Institute (ULI) Europe, “The Impact of Build-to-Rent Housing in European Cities” (2023), <https://europe.uli.org/news/the-impact-of-build-to-rent-housing-in-european-cities/>

⁹⁵ Infrastructure Australia, “Planning Liveable Cities: A Place-Based Approach to Sequencing Infrastructure and Growth” (2018), <https://www.infrastructureaustralia.gov.au/publications/planning-liveable-cities>; NAO (UK National Audit Office), “Evaluating the Value for Money of Housing Interventions” (2020), <https://www.nao.org.uk/report/evaluating-the-value-for-money-of-housing-interventions/>; Hulchanski, J.D., “Housing Policy for Tomorrow’s Cities” (Cities Centre, University of Toronto, 2019), <https://www.citiescentre.utoronto.ca/Assets/Cities+Centre+2013+Digital+Assets/pdfs/publications/HousingPolicyTomorrow.pdf>

⁹⁶ OECD, “Brick by Brick: Building Better Housing Policies” (2021), <https://www.oecd.org/housing/policy-toolkit/>; Kelly, J-F. et al. (Grattan Institute), “The Cities We Need” (2013), <https://grattan.edu.au/report/the-cities-we-need/>

⁹⁷ Australian Treasury, “Economic Benefits of Affordable Housing” (Interim findings, 2022), <https://treasury.gov.au/publication/p2022-303044>; Glaeser, E., “Triumph of the City” (Penguin, 2011); Urban Land Institute (ULI) Europe, “The Impact of Build-to-Rent Housing in European Cities” (2023), <https://europe.uli.org/news/the-impact-of-build-to-rent-housing-in-european-cities/>

⁹⁸ Productivity Commission (Australia), “Public Infrastructure: Productivity and Efficiency” (2021), <https://www.pc.gov.au/inquiries/completed/infrastructure>; NAO (UK National Audit Office), “Evaluating the Value for Money of Housing Interventions” (2020), <https://www.nao.org.uk/report/evaluating-the-value-for-money-of-housing-interventions/>

Finally, on **economic impacts on surrounding areas**, empirical studies by ULI, SGS, and major international policy centres document the positive spill-over effects, precinct activation, and local economic uplift generated by well-executed affordable housing and build-to-rent projects⁹⁹.

In summary, the Gregory Place proposal reflects best practice in contemporary urban economics and planning policy—demonstrating not only statutory compliance but clear alignment with the global evidence base for socially and economically sustainable city-building.

3.5.3 Conclusion: Economic compatibility and sustainability

The comprehensive economic assessment demonstrates that the Gregory Place proposal is highly compatible with both the immediate and strategic economic objectives of the EP&A Act and the current policy direction of the NSW Government. The project aligns with the explicit government priority to deliver greater housing supply—including affordable and build-to-rent dwellings—within existing serviced centres, and in locations supported by public transport, established infrastructure, and significant employment opportunities.

Gregory Place responds directly to clear, evidenced market demand and is commercially viable at the proposed scale, density, and affordable housing mix. By leveraging existing infrastructure and maximising the return on public investment, the development advances NSW Government goals for value for money and fiscal responsibility, in accordance with the State Infrastructure Strategy and the most recent Ministerial Directions on Housing Supply and Urban Renewal (2023–2025)¹⁰⁰.

The economic analysis confirms that the project will generate significant construction and ongoing employment, broaden access to opportunity for key workers and moderate-income households, and directly support local businesses, health, and education providers to attract and retain staff. By delivering a substantial quantum of affordable rental housing in a well-located precinct, Gregory Place reduces housing cost burdens, increases disposable income, and supports sustained local economic circulation—key outcomes highlighted by recent research and NSW Treasury advice¹⁰¹.

The proposal also delivers on the government’s agenda for inclusive, resilient, and prosperous communities. By integrating a diverse population, catalysing place-based renewal, and enabling economic participation, Gregory Place will contribute to the long-term sustainability and vibrancy of Harris Park and Greater Parramatta. The assessment is strongly supported by international and Australian best practice, reinforcing that this approach is not only locally responsive but globally benchmarked.

In summary, the Gregory Place project is economically compatible and sustainable. It provides a compelling, evidence-based case for approval in line with NSW Government objectives to deliver better community outcomes, support economic growth and inclusion, and leverage public investment for the greatest possible public value. The Minister can be confident that the proposal will materially advance both the economic and social wellbeing of the community, now and into the future.

3.6 Environmental compatibility assessment

⁹⁹ Urban Land Institute (ULI) Europe, “The Impact of Build-to-Rent Housing in European Cities” (2023), <https://europe.uli.org/news/the-impact-of-build-to-rent-housing-in-european-cities/>; SGS Economics & Planning, “Measuring the Economic Impact of Urban Renewal Projects” (2021), <https://www.sgsep.com.au/publications/insights/measuring-the-economic-impact-of-urban-renewal-projects>

¹⁰⁰ NSW Government, Ministerial Directions on Housing Supply and Urban Renewal, 2023–2025; NSW Government, State Infrastructure Strategy, 2022

¹⁰¹ Appendix BB – Economic Impact Assessment - Pacific Economics and Sustainability; Australian Treasury, “Economic Benefits of Affordable Housing” (2022); Australian Housing and Urban Research Institute (AHURI), “Understanding the patterns and trends in housing stress and affordability” (Rowley et al., 2022)

Environmental compatibility refers to the capacity of a proposed development to coexist with, support, and enhance the environmental values and functions of its setting, both built and natural. In the planning context of New South Wales, compatibility is not defined as replication or mimicry of existing development, but rather the ability of a proposal to sit harmoniously within its context while supporting the desired future character as expressed through planning controls, strategic documents, and community expectations. This theme captures a wide spectrum of environmental performance considerations, including solar access, thermal comfort, resource efficiency, acoustic separation, biodiversity, and climate resilience.

The statutory foundation for environmental compatibility is found in section 1.3(c) of the EP&A Act, which articulates an objective of “promoting the sustainable management of built and cultural heritage (including Aboriginal cultural heritage)” and “the sustainable use of resources”. Section 4.15(1)(b) of the Act requires decision-makers to consider the likely impacts of the development, including environmental impacts on both the natural and built environment. Further, where a proposal is being assessed under the Housing SEPP 2021, clause 39(2) explicitly requires that a proposal demonstrate “compatibility with the character of the local area”, a concept that necessarily includes environmental character and amenity.

The LEC has consistently held that compatibility is not synonymous with sameness. In *Project Venture Developments Pty Ltd v Pittwater Council* [2005] NSWLEC 191, the Court (Roseth SC) set out a two-limb compatibility test that continues to be widely applied: whether the proposal is compatible with the existing or desired future character of the locality, and whether it integrates well into its surroundings in terms of built form and environmental context. More recently, this test has been affirmed and applied in cases such as *Demir v Georges River Council* [2021] NSWLEC 1339 and *Zhang v Inner West Council* [2022] NSWLEC 1213, where the Court reinforced that compatibility must be assessed against a range of character and performance benchmarks, including landscape setting, built form modulation, sustainability features and amenity outcomes.

The Project Venture principle has been consistently applied and affirmed, most recently in *Micaul Holdings Pty Ltd v Randwick City Council* [2015] NSWLEC 151, where Commissioner Gray held:

“What is required is a careful and balanced consideration of the ways in which the proposed development and existing development relate to each other in the locality. This involves consideration of built form, land use, scale, character and the objectives of the planning instruments.”

The practical import for the present application is that compatibility is a matter of degree, evaluated with reference to both the existing and desired future character, the strategic vision for the area, and the public interest as set out in relevant legislation and policies.

On heritage context, the NSW LEC’s principles articulated in *Helou v Strathfield Municipal Council* [2006] NSWLEC 66 and *Koh v Liverpool City Council* [2017] NSWLEC 1358 require not only an assessment of physical impacts (e.g., views, overshadowing) but also an appreciation of the significance, setting, and legibility of heritage items, and the extent to which new development sustains, enhances, or interprets those values.

In *Demir*, the Court emphasised that “coexistence with surrounding development” is a more appropriate planning goal than direct replication, especially in areas undergoing planned transition. The proposal was upheld on the basis that it reduced adverse environmental impacts compared to the pre-existing condition and achieved strong passive design and energy performance outcomes, contributing positively to the precinct’s evolution.

This understanding is highly relevant to the Gregory Place redevelopment. The proposal involves the replacement of a deteriorated and poorly integrated industrial building with a refined, architecturally and environmentally responsive residential scheme. As detailed, the revised design responds to agency and community feedback and incorporates significant improvements in environmental performance—such as deep soil landscaping, extensive shading, solar optimisation, efficient stormwater controls, and water and energy-saving features. These enhancements materially reduce adverse environmental impacts and actively support the strategic transition of the site in accordance with both local planning objectives and State housing policy.

Academic research also supports this interpretation of compatibility. Bunker and Holloway¹⁰² and Gurrán et al.¹⁰³ emphasise that compatibility in urban infill housing involves “layering” new environmental, social and functional attributes in a way that complements and contributes to the evolving urban structure. International planning literature further reinforces the value of integrated green infrastructure, passive performance, and acoustic design in framing development as environmentally compatible and liveable¹⁰⁴.

It is within this framework—rooted in law, policy, and research—that the environmental compatibility of the Gregory Place project should be assessed. The following subsections step through each element of environmental performance in accordance with the targeted analytical questions, supported by expert reports and measurable benchmarks. Together, they provide a robust foundation to conclude that the proposal is not only compatible but demonstrably improves the environmental functioning and amenity of the surrounding locality.

3.6.1 Contextual transformation and baseline environmental compatibility

The existing industrial building at 2A Gregory Place is not simply out of step with its setting—it is a relic of an era in which industrial utility was allowed to dominate cultural significance¹⁰⁵. Constructed to house pharmaceutical production and associated manufacturing, it rose at a time when the planning system gave primacy to industrial growth, even in proximity to some of the most important heritage landscapes in the nation. The physical form of the building—its scale, siting and impermeable interface—is an enduring reminder of that former industrial priority: a dominance that subjugated the visibility, legibility and spatial setting of adjacent state-significant colonial-era estates including Experiment Farm, Hambleton Cottage, and Elizabeth Farm.

Today, the planning system has evolved. There is now explicit policy recognition that industrial use on this site is no longer appropriate. This change was given formal expression in the department’s issuance of a SCC under the Housing SEPP, and subsequently reinforced through an update to the *Local Strategic Planning Statement (LSPS)*, which now recognises the site’s intended transition to residential use. Despite the underlying industrial zoning technically remaining in place, it is no longer a true reflection of strategic planning intent. The existing built form has outlived its utility, policy support, and environmental acceptability.

This project represents a once-in-a-generation opportunity to heal that disjunction—to remove the industrial structure and replace it with a purpose-designed housing scheme that is environmentally responsible, socially focused, and deeply responsive to the cultural landscape. It is the most significant

¹⁰² Bunker, R. and Holloway, D. (2006). How much of city planning in Australia is about housing? *Housing Studies*, 21(5), 715–731.

¹⁰³ Gurrán, N., Squires, C., and Blakely, E. (2008). Meeting the targets: tools to achieve compact urban growth in SEQ. *Urban Policy and Research*, 26(2), 161–182.

¹⁰⁴ Beatley, T. (2000). *Green Urbanism: Learning from European Cities*. Island Press, Washington, DC.; Farr, D. (2008). *Sustainable Urbanism: Urban Design with Nature*. Wiley, New York.

¹⁰⁵ Statement of Heritage Impact – 2A Gregory Place (July 2025), pp. 9–13

act of contextual reconciliation¹⁰⁶ ³⁷ available in this precinct. The environmental compatibility of the scheme begins, critically, with the removal of the incompatible use.

In its place, the development introduces a thoughtfully crafted residential community designed not only for architectural quality but also for social equity. At a time of crisis-level housing affordability—exacerbated by a complex, often combative planning system—this project proposes to deliver new homes for moderate-income earners, including essential workers, at no cost to the public purse. It is privately funded, but publicly minded ¹. This is not a speculative venture—it is a civic-minded investment in the long-term sustainability and inclusiveness of Harris Park.

The development has been shaped by one of Australia’s most respected design teams. The team includes GBA Heritage, Tzannes, and Yerrabingin, each bringing deep cultural and design literacy to the project. Expert reports have been prepared by highly regarded professionals across fields including historical archaeology, Aboriginal cultural heritage, acoustics, traffic, visual assessment and social infrastructure. These are not generic inputs—they are site-specific, culturally attuned, and professionally peer-reviewed.

Guidance has also been taken seriously. The Heritage Council of NSW has provided formal advice via the Heritage Council Approvals Committee (HCAC), including early direction and recommendations that have been incorporated into the revised scheme as a means of testing compatibility. Further, Heritage NSW, acting in its statutory advisory role, has been engaged throughout the process. Their commentary—alongside feedback from the Design Review Panel and multiple state agencies—has been directly responded to and reflected in the updated envelope and treatment of curtilage, landscape, interpretation and built form.

Community feedback, too, has been acknowledged. A number of submissions raised concerns about heritage, density, and urban change. These concerns reflect something deeper than opposition—they reflect attachment, and value. It is precisely because this place is significant that the community is passionate about its future. But passion must be partnered with action. In this case, to “*do nothing*” is to preserve the worst possible outcome ³⁸: an outdated, over-scaled industrial relic that imposes environmental harm and cultural rupture. The proper response is to “*do it well*”—to replace an obsolete structure with a refined, purpose-built residential scheme that restores compatibility through form, function, and cultural alignment.

Internationally, many historic cities have navigated similar transformations—London’s King’s Cross, the Gasometers in Vienna, the Copenhagen Nordhavn renewal. Each illustrates a consistent principle: that the most effective way to achieve environmental and contextual compatibility is not to freeze the past, nor to erase it, but to build with purpose. Projects that remove harmful legacy uses, integrate modern sustainable design, and interpret rather than mimic history, are those that succeed.

This proposal does not attempt to replicate heritage—it respects it. It steps back where appropriate, softens edges, opens sightlines, and integrates interpretive design elements and materiality that acknowledge the past while enabling the present. Crucially, the scheme has also drawn upon First Nations design review principles to re-establish a connection to Country that prevailed for tens of thousands of years prior to European settlement. This long-standing Aboriginal cultural relationship with the land—particularly through Clay Cliff Creek recognition of a man made structure from the previous chain of ponds in an alternate location that prevailed up until European settlement ⁴³—these considered processes of respectful consideration has informed the landscape response, water systems, view corridors, and ground-level permeability of the design. The more recent 200-year colonial narrative, while

¹⁰⁶ Appendix E – Visual Impact Assessment - Tzannes

important, is no longer privileged in isolation. Instead, it is now aligned with and nested within the deeper and ongoing Aboriginal context. This creates a place that is not merely compatible with its surroundings, but one that is reconciliatory in its environmental, cultural, and temporal dimensions.

Importantly, the project reinstates landscape as the organising principle—bringing green infrastructure, habitat, and water-sensitive design to a site previously dominated by impermeable concrete and built mass.

In doing so, the proposal reinstates lost ecological and hydrological functions across the site, including deep soil planting, restoration of canopy connectivity, and passive stormwater filtration aligned with the Clay Cliff Creek sub-catchment⁴². These measures replace impermeability with landscape function, enabling the site to participate once again in the broader environmental system of the precinct. The return of these systems not only improves the environmental performance of the site but supports biodiversity, reduces downstream risk, and fosters long-term resilience consistent with the principles of ecologically sustainable development.

In sum, the proposal is not just environmentally compatible—it is environmentally redemptive. It replaces a harmful legacy use with a restorative, inclusive and future-facing development. It achieves the objectives of the EP&A Act, including ecological sustainability, cultural heritage conservation, and orderly development¹⁰⁷. It is underpinned by current State policies, expert input, community engagement, and good design.

This is the benchmark for environmental compatibility—not as mitigation, but as transformation.

Having established the statutory, strategic, and contextual basis for environmental compatibility—and demonstrated the foundational transformation achieved through the removal of the industrial structure—the assessment now turns to the specific environmental performance of the proposed development that has gone through a process of refinement over the life cycle of this project. The analysis that follows is structured thematically and draws directly on expert evidence prepared for this application. Each theme is assessed through a set of targeted analytical questions derived from relevant legislation, case law, and policy guidance. Together, these assessments provide a comprehensive and measurable basis for determining whether the proposal achieves not only formal compliance, but substantive environmental compatibility with its setting and the desired future character of the locality.

3.6.2 Environmental theme identification

The environmental compatibility of the Gregory Place proposal is assessed using a structured framework adapted from the Compatibility Matrix assessment model. This model provides a transparent and systematic method for evaluating whether the development demonstrates a high level of environmental performance, consistent with contemporary planning objectives and the contextual conditions of the site.

The framework adopts a thematic approach. Key analytical questions are grouped under performance domains such as solar access, thermal comfort, water management, biodiversity, acoustic amenity, urban heat mitigation, and climate resilience. These domains are evaluated against established statutory and policy benchmarks drawn from the EP&A Act, the Housing SEPP 2021, applicable Ministerial directions, the *Apartment Design Guide*, and established planning principles, including the established compatibility test outlined in *Project Venture Developments Pty Ltd v Pittwater Council* [2005] NSWLEC 191.

¹⁰⁷ Environmental Planning and Assessment Act 1979, s1.3(c), s5.5; Housing SEPP 2021, cl 39(2).

This assessment draws extensively on expert documentation provided in response to the department’s request for information. These documents encompass urban design and architectural analysis, Aboriginal cultural heritage and archaeology, visual and landscape impact assessments, acoustic modelling, and strategic planning review. Where relevant, these materials are supported by policy guidance, design panel feedback and community submissions.

The assessment has been informed by an iterative design process, incorporating engagement with Aboriginal knowledge holders, the Heritage Council of NSW (via the Approvals Committee), local government, the Design Review Panel, and relevant state agencies. This collaborative process has been particularly important given the site’s sensitive location within a culturally layered precinct that includes both colonial-era heritage and continuing Aboriginal connections to Country.

This section does not restate the specific responses to departmental information requests, which are addressed separately. Instead, it presents a comprehensive and forward-looking analysis of environmental performance. Each theme is introduced with analytical questions, assessed against site-specific evidence, and evaluated through the lens of statutory and policy alignment. The result is a robust demonstration of the project’s environmental compatibility with its physical setting and its intended future character.

3.6.2.1 Theme 1: Urban character and visual compatibility

3.6.2.1.1 Explanation of the theme

Urban character and visual compatibility assesses how appropriately a development integrates visually and physically with its immediate surroundings and broader urban environment. This theme directly reflects statutory objectives under the EP&A Act and Housing SEPP and is guided by planning principles established in the Roseth case.

Compatibility in terms of urban character and visual integration does not necessitate the replication of existing built forms; rather, it requires respectful integration that harmonises with established and emerging urban contexts. Key considerations include building scale, height, form, setbacks, landscaping, visual permeability, and street-level articulation. As established by the Roseth principles, new development should ensure appropriate visual transitions, enhancing visual and spatial continuity within the local area and heritage context.

Given its transition from industrial use to residential within a sensitive heritage context, the Gregory Place site presents unique compatibility challenges. It is adjacent to prominent heritage landmarks—including Elizabeth Farm, Hambledon Cottage, and Experiment Farm—and sits within an urban area characterised predominantly by low-rise residential and community-focused development. Consequently, detailed analysis and careful design consideration are essential to ensure compatibility with both existing and desired future urban character.

The following targeted analytical questions enable comprehensive evaluation, supported by evidence drawn from the expert reports referenced and attached to this RFI response report. Each question is structured to facilitate a thorough, evidence-based interrogation of the proposal’s urban character and visual compatibility.

3.6.2.1.2 Analytical questions for urban character and visual compatibility

Scale, height and form

1. Does the development scale reflect an appropriate visual transition from existing low-density heritage areas to the denser Parramatta CBD, consistent with visual impact assessments?
2. How has building height been managed to ensure visual dominance does not occur when viewed from adjacent heritage properties, specifically Hambledon Cottage and Experiment Farm?

3. Does the proposal demonstrate compatibility in height and form with surrounding built forms and streetscape rhythms identified in visual analyses?

Setbacks and articulation

4. Are proposed setbacks sufficient to create visual and physical buffers to sensitive heritage boundaries and neighbouring residential properties?
5. How does architectural articulation specifically address and mitigate perceived visual bulk, ensuring high-quality pedestrian experiences and visual permeability?

Streetscape and urban grain

6. Does the architectural design complement existing architectural patterns, urban grain, and streetscape character described in local strategic planning documents?
7. Does the landscape and public domain design integrate effectively with the existing streetscape character and planned future character, enhancing pedestrian connectivity and public amenity?

Visual relationships and heritage view corridors

8. How are significant view corridors—particularly connecting Elizabeth Farm, Hambledon Cottage, and Experiment Farm—explicitly protected and enhanced by the proposed design?
9. Are the building forms sensitive to heritage sightlines, avoiding silhouette impacts as detailed in visual and heritage analyses?
10. How effectively has the visual impact analysis demonstrated protection of scenic and heritage-related sightlines from key public vantage points?

Landscaping and integration with context

11. Does the landscaping strategy reflect existing streetscape character and heritage landscape values, supporting visual continuity and contextual integration?
12. How does landscaping mitigate visual impacts of built form, particularly from heritage-sensitive viewpoints and residential interfaces?

Materials and finishes

13. How have chosen materials and finishes been explicitly justified to demonstrate visual harmony with the adjacent heritage and local urban contexts, and how do they contribute to reducing visual prominence and ensuring subtle integration within the surrounding heritage environment?

Visual and perceptual integration

14. Does the visual analysis conclusively demonstrate the proposal integrates seamlessly into existing visual contexts, avoiding visual discordance?
15. How effectively do photomontages and visual simulations confirm visual continuity, sensitive integration, and compatibility from key heritage and public viewpoints?

3.6.2.2 Theme 2: Heritage conservation and compatibility

3.6.2.2.1 Explanation of the theme

The theme of heritage conservation and compatibility addresses how sensitively the Gregory Place proposal responds to and integrates with the highly significant heritage context of the Harris Park precinct. This theme aligns directly with statutory objectives under the EP&A Act, the *Heritage Act 1977*, and associated policies, including the heritage provisions under clause 5.10 of the Parramatta Local Environmental Plan 2011, and principles established by the Roseth case.

In considering heritage compatibility, it is necessary to ensure that the proposal not only avoids negative impacts on heritage significance but actively contributes to interpreting, enhancing, and safeguarding heritage values within its vicinity. This includes sensitivity to the State Heritage Register-listed properties of Elizabeth Farm, Hambledon Cottage, and Experiment Farm, each of which has substantial historical and cultural significance at local and state levels.

The proposal sits at the intersection of an area rich in colonial history and Aboriginal cultural heritage, demanding a design response that carefully respects both tangible and intangible heritage values. The challenge of this theme is to ensure new development reinforces rather than diminishes the ability of the community and visitors to appreciate and interpret the precinct's historical narrative, landscapes, built heritage forms, and ongoing Aboriginal connections to Country.

The proposal has been developed iteratively, guided by ongoing consultation with heritage authorities, Aboriginal stakeholders, expert heritage advisers, and independent review panels. Through this process, careful adjustments have been made to height, scale, setbacks, landscape integration, and design articulation to ensure a harmonious relationship between new development and established heritage significance.

The following targeted analytical questions guide a comprehensive evaluation of heritage compatibility, supported explicitly by evidence from heritage and visual impact expert documentation referenced in this analysis and attached to the RFI response report.

3.6.2.2.2 Analytical questions for heritage conservation and compatibility

Heritage values and interpretation

1. How does the proposed development explicitly respect and reinforce the heritage significance of Elizabeth Farm, Hambledon Cottage, and Experiment Farm in accordance with statutory heritage requirements and strategic heritage assessments?
2. Does the design explicitly include interpretive strategies or elements to enhance public understanding and appreciation of the historical and Aboriginal cultural heritage context?
3. How effectively does the proposal protect, enhance, or interpret identified Aboriginal cultural heritage values as articulated through Aboriginal stakeholder consultation and the heritage assessments?

Visual relationships and heritage sightlines

4. How specifically does the development protect significant views and sightlines identified as critical to appreciating heritage items, including those views identified in heritage and visual impact assessments?
5. Does the visual impact assessment demonstrate explicitly how the proposed built form avoids visual intrusion or dominance from heritage-sensitive viewpoints such as Elizabeth Farm, Hambledon Cottage, and Experiment Farm?
6. Have photomontages or visual analyses confirmed the preservation of visual connections to heritage items and their landscapes from public vantage points?

Scale, setbacks, and heritage curtilage

7. Does the scale of the proposed buildings explicitly demonstrate an appropriate and sensitive transition to adjoining heritage items, as evidenced through heritage impact analysis?
8. How have setbacks specifically been designed to protect and reinforce heritage curtilages, particularly regarding Hambledon Cottage and Experiment Farm?
9. Do setbacks and landscape buffers clearly contribute to the preservation and interpretation of heritage spaces and their cultural landscape context?

Materials, finishes, and architectural articulation

10. How do selected building materials and finishes explicitly respond to the materiality, colour palettes, and textures of adjacent heritage buildings and landscapes?
11. Does the architectural articulation demonstrate explicit sensitivity to heritage building forms, rhythms, and detailing, without attempting inappropriate mimicry?
12. Are the proposed architectural forms and façades demonstrably designed to complement heritage items, ensuring visual compatibility and respectful differentiation?

Integration with heritage landscape

13. Does the landscaping plan explicitly demonstrate sensitivity to heritage plantings, gardens, and historic landscapes in adjacent heritage sites?
14. How do proposed new landscape elements explicitly complement and enhance the existing heritage landscape patterns and views identified in heritage assessments?
15. Has the proposal ensured the retention and appropriate integration of significant heritage trees and plantings identified in expert arboricultural and heritage landscape studies?

Impact management and mitigation

16. What explicit heritage impact mitigation measures have been integrated into the design to ensure any potential adverse impacts are effectively avoided or minimised?
17. How effectively does the design explicitly incorporate recommendations from the NSW Heritage Council (HC) and heritage advisers, demonstrating responsive design refinements?
18. Does the proposal explicitly demonstrate compliance with heritage conservation incentives and statutory heritage management plans as required under clause 5.10 of the Parramatta LEP 2011?

3.6.2.3 Theme 3: Acoustic compatibility and residential amenity

3.6.2.3.1 Explanation of the theme

Acoustic compatibility and residential amenity addresses the way the Gregory Place development responds to existing acoustic conditions and ensures a high-quality residential environment, consistent with statutory requirements under the EP&A Act, the NSW *Environmental Protection Authority (EPA) Noise Policy for Industry*, and applicable local development controls under the *Parramatta Development Control Plan*.

Given the site's urban location, acoustic compatibility encompasses considerations related to protecting future residents from external noise sources, including road traffic, community facilities such as the Our Lady of Lebanon Co-Cathedral, and other established local activities. This theme also examines the acoustic performance of the proposed development itself, ensuring operational activities and building services do not adversely impact the amenity of neighbouring properties or heritage-sensitive precincts.

In transitioning the site from industrial to residential use, significant acoustic benefits are anticipated due to the removal of noise-intensive industrial activities and heavy vehicle movements. Nevertheless, the acoustic design of residential buildings must be robust enough to mitigate ongoing environmental noise sources and to deliver a high-quality living environment consistent with contemporary standards for apartment developments.

This theme explores the effectiveness of proposed acoustic treatments, design responses, façade constructions, and operational noise controls. The assessment includes targeted questions structured to interrogate how comprehensively the proposal manages acoustic impacts to safeguard residential amenity and compatibility.

Analytical responses will be supported by explicit evidence and expert acoustic assessments attached to the RFI response report, ensuring clarity, rigour, and transparency in the evaluation process.

3.6.2.3.2 Analytical questions for acoustic compatibility and residential amenity

Management of external noise sources

1. How effectively does the design manage acoustic impacts from external sources, including road traffic on Hassall Street, to achieve the residential noise amenity criteria outlined in EPA guidelines and local development controls?
2. Does the acoustic design specifically address and mitigate noise impacts from periodic activities and special events at the Our Lady of Lebanon Co-Cathedral, ensuring internal residential amenity is maintained?

3. What specific façade treatments and building construction standards are proposed to ensure residential units meet relevant acoustic criteria for noise attenuation from external sources?

Acoustic transition and neighbourhood compatibility

4. How has the removal of industrial activity explicitly improved the acoustic environment and reduced overall noise impacts on surrounding residential and heritage-sensitive areas?
5. Does the proposal include explicit measures ensuring new residential activities will not generate noise impacts incompatible with the existing quiet residential and heritage precinct?
6. Are the design and operational controls sufficient to demonstrate that the proposal will avoid or mitigate noise conflict with neighbouring community and religious activities?

Internal acoustic amenity

7. How effectively do internal acoustic treatments, such as wall construction, glazing design, and internal layouts, ensure high levels of acoustic comfort and privacy within residential apartments?
8. Are acoustic standards explicitly compliant with or exceed the requirements of the Apartment Design Guide and relevant Australian Standards, ensuring residential amenity outcomes suitable for contemporary living?
9. What explicit internal design strategies have been adopted to ensure acoustic privacy between apartments, common areas, and residential amenities?

Plant, equipment, and operational noise management

10. Has detailed acoustic analysis explicitly confirmed that noise generated by building services plant, ventilation, lifts, and operational equipment will meet relevant EPA and local authority acoustic criteria?
11. Are plant and equipment locations and acoustic treatments clearly identified and justified through acoustic assessments, demonstrating minimal noise impact on neighbouring properties and heritage precincts?
12. Does the acoustic assessment explicitly demonstrate compliance with the NSW EPA Noise Policy for Industry for all operational noise generated by the proposed development?

Acoustic benefit and long-term amenity

13. Does the acoustic assessment specifically identify measurable acoustic benefits gained by replacing the current industrial use with the proposed residential scheme?
14. How explicitly has the acoustic assessment demonstrated long-term benefits in terms of noise reduction, improved environmental quality, and compatibility with the desired future residential character outlined in local strategic planning documents?
15. Are acoustic mitigation measures, such as landscaping and strategic spatial planning, explicitly integrated into the proposal to enhance acoustic compatibility and amenity for future residents and surrounding communities?

3.6.2.4 Theme 4: Landscape integration and environmental performance

3.6.2.4.1 Explanation of the theme

Landscape integration and environmental performance evaluates how effectively the Gregory Place development enhances local landscape quality, biodiversity, ecological connectivity, and overall environmental sustainability. This theme responds explicitly to the statutory provisions set out under the EP&A Act, Housing SEPP and local landscape provisions within the Parramatta Local Environmental Plan 2011 and the Apartment Design Guide.

The Gregory Place site represents a unique opportunity for environmental enhancement and restoration, situated within an important ecological and cultural corridor. This theme considers the proposal's potential to positively transform the site from its existing industrial state—characterised by extensive hard surfaces, limited ecological value, and visual discordance—into a high-quality, ecologically

resilient residential precinct featuring generous green space, native planting, and integrated ecological strategies.

The analysis under this theme explores explicitly how the proposal addresses key environmental objectives, including urban heat mitigation, stormwater management, biodiversity enhancement, and the meaningful integration of cultural landscape values. It also assesses how well the development achieves strategic alignment with local landscape and environmental strategies, including the desired future character articulated in Parramatta's Local Strategic Planning Statement.

Questions developed for this theme enable detailed evaluation, supported explicitly by landscape and environmental design reports, biodiversity assessments, and arboricultural analyses referenced within the RFI response report.

3.6.2.4.2 Analytical questions for landscape integration and environmental performance

Ecological enhancement and biodiversity

1. Does the landscape strategy explicitly demonstrate a measurable improvement in biodiversity and ecological connectivity compared with the site's current industrial condition?
2. How explicitly does the proposed landscaping incorporate endemic and native plant species to enhance local biodiversity and ecological resilience, consistent with best-practice ecological management?
3. Are habitat creation and biodiversity-supporting elements such as green roofs, habitat corridors, and native planting explicitly integrated within the landscape and design strategy?

Urban heat mitigation and climate responsiveness

4. How effectively does the proposed landscape design explicitly mitigate urban heat island effects through the integration of substantial canopy coverage, appropriate planting species, and strategic landscape elements?
5. Does the development demonstrate explicit alignment with Parramatta's urban cooling and sustainability strategies, contributing measurably to localised cooling and improved microclimate outcomes?
6. Are landscape interventions clearly documented as part of the proposal's overall climate-responsive design strategy, enhancing thermal comfort for residents and the surrounding public domain?

Stormwater management and water-sensitive design

7. How explicitly does the proposal incorporate water-sensitive urban design (WSUD) principles to manage stormwater runoff, improve water quality, and reduce pressure on existing stormwater infrastructure?
8. Does the design clearly demonstrate explicit strategies for stormwater capture, treatment, reuse, or infiltration, contributing positively to ecological health and hydrological stability of the site and adjoining areas?
9. Have stormwater management strategies been explicitly aligned with local planning requirements and best-practice environmental management standards outlined by relevant authorities?

Integration with cultural landscapes and heritage contexts

10. Does the landscape plan explicitly reference and respond sensitively to existing historical landscape patterns and identified Aboriginal cultural heritage values?
11. How explicitly do landscaping elements reflect historical planting schemes and landscape characteristics associated with adjacent heritage properties such as Elizabeth Farm, Hambledon Cottage, and Experiment Farm?

12. Is the integration of cultural landscape values clearly documented through planting palettes, spatial arrangements, interpretive elements, and public art, enhancing cultural awareness and continuity within the precinct?

Landscape buffers and visual amenity

13. Does the landscape design explicitly provide effective visual buffers and screening between new buildings, adjoining heritage items, residential properties, and public open spaces?
14. Are landscape buffers clearly identified and designed explicitly to mitigate visual impacts, protect sightlines, and ensure visual continuity and integration with the surrounding urban and heritage context?
15. How effectively does the landscape strategy explicitly support the overall visual compatibility and streetscape quality identified within visual impact assessments and urban design analyses?

Retention and integration of existing significant trees

16. Are existing significant trees explicitly retained and integrated within the landscape design, supported by detailed arboricultural analysis and management strategies?
17. Does the landscape strategy clearly articulate explicit management and protective measures for existing trees identified as ecologically or culturally significant?
18. How explicitly are retained significant trees integrated within the site design to enhance local ecological, aesthetic, and heritage values?

3.6.2.5 Theme 5: Environmental sustainability, resource efficiency and building performance

3.6.2.5.1 Explanation of the theme

This theme evaluates how effectively the Gregory Place proposal delivers environmentally sustainable buildings that are resource-efficient, climate-responsive and aligned with best practice in contemporary apartment design. It reflects the principles of ecologically sustainable development set out in the EP&A Act, and is informed by the objectives of the Housing SEPP 2021, the *Apartment Design Guide*, and applicable Ministerial Directions.

The focus of this theme is building-scale sustainability—specifically the performance of apartments and communal spaces in terms of energy efficiency, passive design, thermal comfort, water conservation, waste management and sustainable material use. It also considers how the proposal supports long-term liveability and resilience for occupants, including those in affordable housing.

The Gregory Place project has been designed to exceed minimum performance standards under the National Construction Code and BASIX. The design incorporates a range of sustainability measures including passive solar orientation, durable and low-impact materials, efficient building services, and strong lifecycle performance outcomes. Importantly, the project aims to demonstrate that high-quality environmental design can be delivered at scale and applied equitably across both market and affordable dwellings.

The following analytical questions enable a targeted evaluation of the project's environmental sustainability and building performance. Each is structured to support evidence-based assessment using expert material contained in the RFI response documentation.

3.6.2.5.2 Analytical questions for sustainability, resource efficiency and climate resilience

Energy efficiency and passive design

1. Does the development meet or exceed energy efficiency standards under the National Construction Code and BASIX, particularly in relation to apartment thermal performance?
2. How effectively does the design incorporate passive solar orientation, natural ventilation, shading and glazing to reduce operational energy demand?

3. Are energy-efficient systems—including high-performance lighting, HVAC and appliances—clearly integrated into the design and specification?
4. Does the roof structure and electrical infrastructure support future solar PV installation or shared embedded networks?

Water conservation

5. Have low-flow fixtures, drought-resistant landscaping and other water-saving measures been incorporated to meet or exceed BASIX water targets?
6. Are rainwater capture and reuse systems proposed for non-potable uses such as irrigation or toilet flushing?
7. Does the proposal include clear strategies to reduce potable water consumption at both dwelling and communal levels?

Material selection and lifecycle performance

8. Are materials selected for low embodied energy, durability and recyclability, and are they supported by a lifecycle performance rationale?
9. Does the development adopt construction methods that minimise waste, such as modularity, prefabrication or efficient material logistics?
10. Is there a sustainability report or material strategy that identifies how lifecycle emissions and maintenance requirements have been addressed?

Waste reduction and operational efficiency

11. What features are proposed to support recycling, food waste separation and waste minimisation during both construction and occupation?
12. Are construction and demolition waste targets articulated in line with circular economy principles?

Thermal comfort and climate resilience

13. Has the development been designed to maintain thermal comfort during extreme heat without sole reliance on mechanical cooling?
14. Are communal and outdoor areas shaded, ventilated and designed for high-temperature events?
15. Does the building envelope contribute to climate resilience through passive design, robust thermal mass and energy efficiency?

Environmental equity and housing quality

16. Are sustainability measures equitably distributed across all apartments, including affordable and social housing units, ensuring environmental justice in design quality?

Strategic policy alignment

17. How does the proposal align with council and NSW Government strategies relating to net zero targets, climate resilience and environmental performance?
18. Is the development consistent with the sustainability principles of the Parramatta Local Strategic Planning Statement and any associated environmental sustainability strategies?
19. How does the project demonstrate that affordable housing can be delivered with high environmental standards, supporting intergenerational equity and public value?

3.6.2.6 Theme 6: Interface management and transitional integration

3.6.2.6.1 Explanation of the theme

This theme addresses how well the Gregory Place development manages its physical and visual interfaces with adjoining land uses, built forms, heritage items, and public domain elements. It interrogates the compatibility of the proposal with both the **existing context** and the **desired future character** as expressed in the Parramatta Local Strategic Planning Statement (LSPS), the Housing SEPP, and Ministerial Directions. The principles from *Project Venture Developments Pty Ltd v Pittwater Council*

[2005] NSWLEC 191 (Roseth case) remain central to this assessment, particularly in evaluating built form transitions, spatial sequencing, and character harmonisation.

The Gregory Place site occupies a pivotal transitional location—bridging a historic low-scale precinct, a major place of worship, and the emerging higher-density character of the Parramatta CBD fringe. The site is also undergoing a transformation in land use—from legacy industrial to contemporary affordable residential—requiring careful modulation of scale, form, function, and spatial arrangement to prevent abrupt or jarring transitions.

Interface management extends beyond visual compatibility; it encompasses acoustic, privacy, functional, and access considerations. Of critical importance are the site’s boundaries with:

- The Our Lady of Lebanon Co-Cathedral.
- Elizabeth Farm and the associated heritage landscape.
- Adjoining residential properties and community buildings; and
- The public realm along Gregory Place and Hassall Street.

This theme enables rigorous testing of how well the development engages with and improves these interfaces, ensuring that new housing enhances—rather than undermines—the amenity, identity, and functionality of surrounding land uses.

3.6.2.6.2 Analytical questions for interface management and contextual transition

Visual and built form transitions

1. How does the proposed building form and massing establish a clear and legible visual transition from the low-scale heritage precinct to the east toward the denser urban structure to the west?
2. Are height transitions clearly stepped, modulated, or otherwise articulated to avoid abrupt changes in scale at key interfaces (e.g. with heritage buildings, the Cathedral, and low-rise neighbours)?
3. Does the built form composition contribute to an orderly and respectful streetscape rhythm, consistent with surrounding development and strategic planning objectives?

Use compatibility and functional adjacency

4. How does the proposed residential use interface with community and religious uses, particularly the Co-Cathedral, in a way that supports mutual amenity and avoids functional conflict?
5. Has a detailed analysis been undertaken to ensure that the new residential use will not result in land use conflict, overshadowing, or other functional impacts on adjacent sites?
6. Is the removal of industrial activity demonstrably improving the quality and compatibility of land use across the precinct, and does it align with council’s LSPS vision for the site?

Public domain and edge activation

7. How has the proposal been designed to ensure active, safe, and attractive edges along Gregory Place and Hassall Street?
8. Are entrances, openings, landscape elements, and frontage treatments used effectively to activate interfaces, promote pedestrian movement, and support public domain amenity?
9. Does the interface with the street respect the fine-grain pedestrian character of the precinct, and does it avoid long blank walls or inactive frontages?

Acoustic and privacy interfaces

10. How are potential acoustic conflicts with neighbouring land uses managed—particularly with respect to worship events, community gatherings, and early morning or late-night activity?
11. Do setbacks, screening devices, and internal layouts protect the acoustic and visual privacy of both new residents and adjoining land users?

12. Are communal and private open spaces located and treated in a way that avoids overlooking or other amenity intrusions across sensitive interfaces?

Landscape and environmental buffering

13. How does the landscape design reinforce interface management, including the use of planting, fencing, topography, and ground treatments to soften transitions and provide buffers?
14. Are existing trees and vegetation used strategically to support interface resolution and continuity with the surrounding natural and cultural landscape?
15. Does the proposal contribute positively to the perceived environmental quality of interface zones through generous landscaping and sustainable design?

Cultural and heritage sensitivity at edges

16. Has the proposal demonstrated a sensitive response to cultural and heritage curtilage along its eastern and southern boundaries?
17. Are the spatial and visual connections between heritage elements and the broader precinct respected through interface articulation and urban design strategies?
18. How does the interface treatment support community understanding of the site's heritage, cultural significance, and contextual role in the evolution of the precinct?

3.6.2.7 Theme 7: Green infrastructure systems and ecological integration

3.6.2.7.1 Explanation of the theme

This theme addresses the environmental performance and ecological integrity of the infrastructure systems proposed for Gregory Place. While social and economic compatibility have previously assessed the adequacy and efficiency of infrastructure in terms of service access, transport connectivity and capital cost, this theme focuses exclusively on the ecological sustainability, climate resilience and environmental optimisation of those systems.

The EP&A Act emphasises ecologically sustainable development (ESD) as a foundational objective, and the Housing SEPP highlights the need to minimise adverse environmental impacts of new housing developments. This includes integrating WSUD, reducing greenhouse emissions, enhancing urban microclimates, and promoting infrastructure models that support circular economy outcomes.

The Gregory Place development offers a unique opportunity to replace an outdated and ecologically barren industrial site with a contemporary, sustainable infrastructure network. The project embeds passive systems and environmentally responsive strategies in its layout, building design, and public domain—enabling infrastructure to not only service housing but to deliver environmental value over time.

This theme assesses the infrastructure strategy as an integrated ecological system, considering stormwater, energy, water, and waste from the perspective of long-term environmental compatibility. The questions below are designed to elicit detailed responses using expert evidence included in the RFI response package, particularly from the civil, landscape and design reports.

3.6.2.7.2 Analytical questions for environmental infrastructure and ecological performance

Water management and ecological integration

1. Does the stormwater system incorporate WSUD principles, including on-site retention, filtration, detention and infiltration, to improve water quality and reduce urban runoff?
2. Are nature-based infrastructure solutions—such as rain gardens, vegetated swales, or bio-retention basins—used to improve hydrological function and ecological resilience?
3. How does the stormwater strategy support restoration of the Clay Cliff Creek sub-catchment and broader catchment health through permeability, staged flow, and environmental buffering?

Energy and climate performance of infrastructure

4. Are the precinct's energy systems designed to reduce greenhouse gas emissions, including through embedded networks, centralised solar-ready systems, or passive energy distribution?
5. Has the energy and servicing infrastructure been evaluated for climate resilience, particularly under stressors such as extreme heat, localised flooding or grid instability?
6. Are rooftops, basements or common service corridors designed to perform dual environmental functions (e.g. solar platforms, green roofs, stormwater attenuation, passive cooling zones)?

Circular economy and lifecycle performance

7. Are precinct-scale greywater reuse or stormwater harvesting systems integrated into the infrastructure network to reduce potable water demand and irrigate the landscape?
8. Does the material and systems strategy for infrastructure adopt low-impact materials, modularity, or lifecycle durability in accordance with circular economy principles?
9. How do service rooms, waste enclosures and infrastructure nodes support future food/organic waste separation, material recycling, and efficient resident participation?

Monitoring and adaptive environmental systems

10. Is performance monitoring infrastructure (e.g. metering of energy, water, waste) embedded in the design to allow long-term tracking of environmental outcomes?
11. Are the utility networks designed with technical flexibility for future upgrades such as electric vehicle charging, energy storage, precinct-level microgrids or recycled water loops?
12. Does the proposed infrastructure strategy align with or exceed the targets and performance measures articulated in council's Environmental Sustainability Strategy and other applicable NSW Government frameworks?

3.6.3 Environmental theme compatibility analysis

3.6.3.1 Theme 1 analysis: Urban character and visual compatibility

3.6.3.1.1 Scale, height and form

- 1. Does the development scale reflect an appropriate visual transition from existing low-density heritage areas to the denser Parramatta CBD, consistent with visual impact assessments?**

The Gregory Place development provides a deliberate and contextually responsive scale transition between its heritage-adjacent residential setting and the increasing urban intensity of the Parramatta CBD to the west. This is achieved through careful height modulation, site-sensitive building placement and a design strategy that locates taller elements away from sensitive interfaces.

The built form adopts a mid-rise profile, stepping from four storeys at its northern and eastern edges—adjacent to Hambledon Cottage, Experiment Farm and low-scale residential properties—up to a maximum of eight storeys towards the south-west of the site. The central portions of the development are framed by landscaped setbacks, podium treatments and articulation strategies that visually divide the built form into discrete elements. These strategies reduce visual bulk and reinforce legibility from key public and heritage viewpoints¹⁰⁸.

The visual impact assessment supports this reading. Photomontages and visual simulations prepared for the project demonstrate that the new buildings are largely obscured or recessive in ¹⁰⁹ Farm House precinct. The assessment concludes that the proposal “*avoids dominating or interrupting significant view corridors*” and “*retains visual prominence of heritage items within the local skyline*”¹⁰⁹.

The GBA Heritage Impact Statement reinforces this conclusion by stating that the proposal demonstrates “*an appropriate transition of scale*” and “*respects the primacy of heritage through setback and*

¹⁰⁸ Appendix A Design report - Tzannes, section 3.3, “Height Strategy and Built Form Transition”

¹⁰⁹ Appendix E – Visual Impact Analysis - Tzannes, Section 6.2, “Viewpoint Analysis Summary”

*modulation”*¹¹⁰. Similarly, the statement confirms that the project’s built form “*steps height in response to its surrounding urban and heritage edges*” and achieves a “*contextually respectful transition to the city centre*”¹¹¹



Figure 6 Comparison view from north to Hambleton cottage

[Photomontage from north and north west being a typical view of a visitor to Hambleton cottage. This view is showing the stepped mid-rise form of the proposal relative to Hambleton Cottage and the broader heritage setting. The visual hierarchy retains the prominence of heritage elements while integrating new built form with minimal dominance].¹⁰⁹

The Apartment Design Guide (ADG) principles have also informed the scheme. The site’s width and block length allow for deep setbacks and variable building heights that support a visual tapering effect across the site when viewed from multiple vantage points . In urban design terms, the approach delivers a transitional interface, balancing the visual sensitivity of the heritage zone with the evolving built form character of Harris Park and the Parramatta CBD.

Tree planting and landscape elements further assist in reducing apparent building height. As noted in the Tzannes design report, “*the proposed canopy structure is intended to intercept long views to upper levels, blending the built form into a structured, vegetated foreground*”¹¹². This approach supports both the landscape character and visual compatibility of the development, particularly at the interface with Gregory Place and the northern edge of the site.

2. How has building height been managed to ensure visual dominance does not occur when viewed from adjacent heritage properties, specifically Hambleton Cottage and Experiment Farm?

¹¹⁰ Appendix P – Statement of Heritage Impact Section 8, “Assessment Against the NSW Heritage Manual”

¹¹¹ Appendix A Design report- Tzannes - Section 2.2, “Apartment Design Guide Integration”

¹¹² Ibid Section 4.2, “Landscape and Public Realm Strategy”

The Gregory Place proposal demonstrates careful modulation of height and massing to avoid visual dominance from sensitive heritage viewpoints, most notably Hambledon Cottage and the Experiment Farm precinct. The architectural strategy responds directly to the Roseth planning principle of compatibility, whereby new development must not visually compete with or overwhelm heritage items, but rather defer to their established scale, prominence, and setting.

The design achieves this through a combination of spatial separation, stepped building envelopes, and detailed modulation. The tallest elements of the development are placed to the south-west of the site—furthest from Hambledon Cottage—while the northern edge of the scheme, facing Gregory Place and the heritage interface, adopts a lower scale of four to five storeys. The Tzannes design report confirms that this height strategy *“maintains visual legibility of the heritage items and prevents overshadowing or encroachment upon their setting”*¹¹³.

Setbacks from heritage boundaries and the use of intermediate terraces and landscaped podiums further attenuate the apparent height of the proposal. Photomontages prepared within the visual impact study show that the upper levels of the new buildings are recessive and largely screened from ground-level heritage viewpoints. For example, from the forecourt of Hambledon Cottage, the development is only partially visible above the tree canopy, and appears as a neutral urban backdrop rather than a visually intrusive form^{109 106}. Figure 4 Comparison view eastern view (viewpoint from Hambledon Cottage) illustrates this effect clearly, showing the integration of the new form without disruption to the visual integrity of the heritage setting.

The GBA Consolidated Statement of Heritage Impact supports this interpretation, noting that the development achieves *“a respectful approach to height, massing, and separation that allows heritage items to retain their visual primacy and avoids silhouette intrusion into identified heritage sightlines”*¹¹⁴. It further states that the modulation and setbacks are consistent with best-practice heritage urban design responses, and that the proposed scale *“sits comfortably within the transitional character zone between low-scale heritage and the urban core”*¹¹⁴.

Additionally, the proposal aligns with the objectives of the Apartment Design Guide, which encourage height transitions that respond to context, preserve significant views, and reinforce the legibility of heritage forms in evolving precincts. The Guide highlights that massing should *“respond to key urban elements including heritage landmarks and civic spaces,”* a principle clearly embedded in the Gregory Place scheme¹¹⁵.

This measured approach to scale and height not only mitigates adverse visual impact but also actively contributes to a layered and contextually nuanced built form outcome, enhancing the environmental compatibility of the development within its highly sensitive heritage setting.

3. Does the proposal demonstrate compatibility in height and form with surrounding built forms and streetscape rhythms identified in visual analyses?

Yes. The proposal demonstrates a high degree of compatibility in both height and form with its surrounding built context, while also responding to the nuanced rhythms of the local streetscape. The design reflects a sophisticated transition strategy that moves from the fine-grained residential and heritage-scaled elements of Harris Park to the emerging medium-density character of the broader Parramatta CBD edge.

¹¹³ Appendix A – Design Report - Tzannes

¹¹⁴ Appendix P – Statement of Heritage Impact – GBA

¹¹⁵ NSW Apartment Design Guide (NSW Government, 2015), Part 3D.1

The Tzannes design report explains that the development is conceived as a “campus of buildings” rather than a singular mass, with each building forming part of an integrated sequence that respects the scale, articulation, and rhythm of neighbouring buildings. The design reads as a series of mid-rise blocks with stepped profiles, creating a natural gradation in height from the lower-rise residential edges to the taller urban core elements ¹¹³.

In particular, the street-oriented buildings along Gregory Place and the Experiment Farm boundary are composed with careful articulation and modulation in plan and elevation. These buildings adopt a consistent parapet line and a fine-grained vertical rhythm, which reflects the narrower lot patterns and domestic scales present in the local precinct. The Visual Impact Assessment confirms this strategy, noting that *“the stepped building forms along the north and east boundaries maintain the scale relationship with neighbouring properties, avoiding abrupt transitions or visual dominance”*¹¹⁶.



Figure 7 Comparison view eastern view

[This photomontage shows the Hambleton cottage in the landscape setting, the change includes an increased northern setback and landscaped shared way in the updated design ensures the proposed envelope is largely concealed by existing and proposed vegetation].

The central and western buildings in the scheme respond to the broader block structure of the area. Their podium and tower configuration is broken into vertical segments, separated by landscaped breaks and pedestrian links. This approach is deliberately intended to reflect the urban grain of the surrounding Harris Park precinct while avoiding continuous monolithic facades. The design report also emphasises that *“upper-level setbacks, rooftop sculpting, and material differentiation reinforce the rhythm of built form across the site”* ¹¹³.

Furthermore, the GBA Heritage Impact Statement affirms the compatibility of the proposed building forms with the historic landscape context. It finds that the scale and spacing of built elements are *“sympathetic to the heritage curtilage of Hambleton Cottage and Experiment Farm,”* and that *“the overall pattern of development follows a rhythm that avoids visual clutter or discord”*

3.6.3.1.2 Setbacks and articulation

4. Are proposed setbacks sufficient to create visual and physical buffers to sensitive heritage boundaries and neighbouring residential properties?

Yes. The proposal includes carefully calibrated setbacks that create both visual and physical buffers to adjacent heritage items and low-density residential development, particularly along the northern and eastern edges of the site where the context is most sensitive. These setbacks are not uniform but are modulated to correspond with the varying proximity and significance of neighbouring elements, including Hambleton Cottage and Experiment Farm.

¹¹⁶ Appendix E – Visual Impact Assessment - Tzannes

Along Gregory Place and the boundary with the heritage curtilage, the design applies significant building separation. This includes deep landscaped setbacks—up to 12 metres in certain locations—that provide spatial relief and accommodate planting zones designed to visually screen built form from adjacent viewpoints. These setbacks also assist in reducing overshadowing and improving sky exposure, particularly for residential interfaces with lower building scales ^{113 114}.

The Tzannes design report notes that *“the podium scale and street walls at the heritage interface are shaped to reinforce pedestrian scale and allow for a sense of breathing space”* between the new built form and historic elements ¹¹⁴. The design utilises a system of cascading setbacks at upper levels—starting as low as three storeys along the Gregory Place frontage and increasing to four or five storeys before transitioning to the taller built form behind. This approach ensures that the lower-scaled frontage defines a rhythm consistent with the existing urban grain and preserves the legibility of heritage settings from key vantage points ¹¹³.

Further articulation within the setbacks enhances the effect. The Visual Impact Assessment confirms that *“the built form’s placement and setback strategy result in a minimal visual presence when viewed from the Experiment Farm and Hambledon Cottage contexts”* and that *“the physical buffer ensures the proposal does not encroach upon the perceptual setting of nearby heritage fabric”* ¹¹⁴.

The GBA Heritage Impact Statement also endorses this approach, stating that the proposal *“ensures an appropriate degree of separation between heritage boundaries and new structures through stepped setbacks and the careful arrangement of built form elements”* and that this strategy *“maintains both the physical and visual autonomy of the heritage items”* ¹¹⁴.

Collectively, these setbacks operate not only as physical buffers but as devices for integrating the development into its historic and residential surrounds without intrusion or visual discord.

5. How does architectural articulation specifically address and mitigate perceived visual bulk, ensuring high-quality pedestrian experiences and visual permeability?

The Gregory Place development applies a sophisticated architectural articulation strategy that mitigates visual bulk and enhances the pedestrian experience across its interface zones. As explained in the Tzannes design report, the design adopts a *“campus”* approach that deliberately separates the built form into a series of articulated, mid-rise building elements. Each of these is broken into finer vertical and horizontal components through modulation in plan and elevation, creating a series of stepped profiles, varied rooflines, and articulated corners that avoid a monolithic appearance ¹¹³.

To further reduce visual massing, the buildings incorporate recessed upper levels, deep balconies, and material contrasts between base, middle and upper storeys. This layered façade treatment is consistent with design excellence principles and provides a rhythm of shadow, texture and relief that diminishes bulk when perceived at street level ^{113 114}. These strategies are particularly evident along Gregory Place and the eastern interface, where fine-grained articulation mimics the rhythm and proportions of existing residential development.



Figure 8 Publicly accessible Green Spine showing OLOLC beyond

The GBA Heritage Impact Statement confirms that the architectural modulation and setbacks “respond to the surrounding built form pattern in scale and expression,” and that the interface buildings “adopt a vertical rhythm and articulated parapet line to reflect the local streetscape structure” ¹¹⁴. This ensures compatibility with both the residential setting and nearby heritage items while supporting the desired future character of the precinct.

Pedestrian experience is also a key design driver. Continuous landscape forecourts and a network of mid-block pedestrian links create a fine-grained public realm with a high degree of visual and physical permeability. These links reinforce site legibility and walkability while enabling framed views through the site. The visual impact study notes that “pedestrian-level articulation, landscaping and through-site connections reduce the perceived scale of buildings and enhance human-scale engagement with the built form” ¹¹⁶. These measures ensure that the proposal not only manages its scale but also contributes positively to the emerging urban fabric of Harris Park, supporting pedestrian movement, landscape integration and contextual coherence.

3.6.3.1.3 Streetscape and urban grain

6. Does the architectural design complement existing architectural patterns, urban grain, and streetscape character described in local strategic planning documents?

Yes. The architectural design of the Gregory Place development clearly complements the existing urban grain and streetscape character of Harris Park while aligning with the future character aspirations set out in strategic planning documents. The design responds to the established built environment by embedding fine-grained modulation, a human-scaled podium, and landscaped interfaces that echo the historic subdivision patterns and domestic rhythm of the precinct.

The Tzannes design report notes that the development is composed as a network of mid-rise buildings arranged around a landscaped open space spine, with setbacks and articulation that respect the

historical lot patterns and pedestrian movement corridors within Harris Park. This approach “*emulates a village-like structure*”, consistent with the area’s architectural morphology and supports visual continuity with both the fine-grain residential fabric and the anticipated transition to denser forms in the Parramatta CBD fringe ¹¹³ .

The building articulation strategy reinforces this intent. The design avoids blank or unbroken façades, employing vertical and horizontal modulation to echo the rhythm of detached and semi-detached dwellings that typify the historic precinct. As observed in the Statement of Heritage Impact, the design “*maintains the pattern of massing and spacing found in the surrounding street network*” and avoids the imposition of large unbroken building footprints ^{113 114 116} .

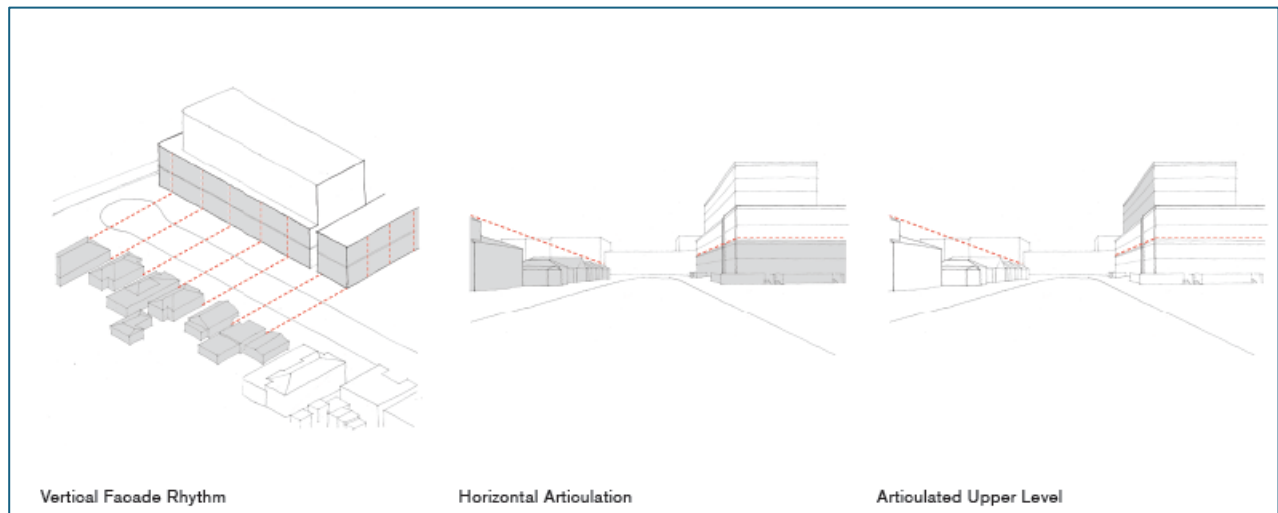


Figure 9 Design strategies supporting a cohesive balance

[Diagrammatic articulation strategies showing consistency with local built form character through vertical rhythm, horizontal modulation and upper-level sculpting].

Strategically, this built form response aligns with the objectives of the Parramatta Local Strategic Planning Statement (LSPS), which seeks to balance growth with character, particularly around the heritage-rich Harris Park neighbourhood. The LSPS identifies Harris Park as an area for sensitive infill development that complements its colonial heritage context while improving amenity, legibility and street activation¹¹⁷. The proposed development supports these policy aims by embedding a permeable ground plane, defining active edges and aligning key built elements with existing view corridors and lot boundaries.

Overall, the architectural design has been informed by a rigorous analysis of existing patterns and future intent, resulting in a scheme that complements and enhances the Harris Park streetscape. The proposal avoids visual discordance and demonstrates compatibility in scale, rhythm, and materiality.

7. Is the proposed development aligned with the street grid and subdivision pattern of the surrounding area?

Yes. The proposed development demonstrates strong compatibility with the established street alignment and subdivision pattern of Harris Park, particularly in its response to Gregory Place and the heritage-affected local context. The design has been carefully arranged to reinforce the fine-grained street pattern, with building modules and landscaped setbacks corresponding to the historic rhythm of lot widths and established pedestrian connections.

¹¹⁷ City of Parramatta, *Local Strategic Planning Statement*, 2020, pp. 36–37

The Tzannes design report explains that the proposal “*respects the existing urban morphology of Harris Park,*” especially the clear north–south and east–west grain informed by Gregory Place, Allen Street and the linear alignment of the Experiment Farm precinct^{114 116 113}. Buildings are organised to front the existing street, with built forms broken down into discrete volumes reflective of the scale and articulation typical of the subdivision fabric.

Figure 9 from the design report illustrates this strategy through a series of compositional diagrams. These demonstrate how vertical rhythm, horizontal articulation, and upper-level sculpting mirror the grain of the surrounding built environment. By aligning its key axes and facade composition with historical lot dimensions and built form scales, the project maintains continuity with the established subdivision character¹¹³.

Further, the visual and urban design assessments confirm that the project avoids disruption of the existing street grid or view corridors and instead contributes positively to the urban rhythm and permeability of Harris Park¹¹⁶. The landscape design reinforces this, with tree plantings and paths aligned to existing street and property lines, creating a legible and integrated pedestrian interface throughout the site¹¹³.

This alignment with existing subdivision and street frameworks enhances the project’s contextual fit and ensures the development complements the spatial order of the precinct.



Figure 10 Public realm structure and landscape response to Harris Park subdivision pattern

[This figure illustrates the development's spatial organisation, showing publicly accessible spaces (yellow), private resident zones (shaded pink), and landscape/tree planting arrangements aligned to the historic street and allotment grain. Hambleton Cottage's curtilage to the north is respected through setback and visual buffering].

3.6.3.1.4 Visual relationships and heritage view corridors

8. Does the development incorporate elements of landscape design that enhance compatibility with the historic setting of Hambleton Cottage and Experiment Farm?

Yes. The Gregory Place proposal integrates a carefully resolved landscape scheme that significantly enhances its compatibility with the adjoining heritage curtilage of Hambleton Cottage and Experiment Farm. The design intentionally avoids hard interfaces and instead employs layered landscaping, tree

canopies, and shared open space networks to soften the transition between built form and heritage setting.

The northern boundary of the site—adjoining Hambledon Cottage—is treated with a substantial landscape buffer composed of native canopy trees, understorey planting, and pathway edges that align with the topography and vegetation patterns found in the heritage setting⁴². This approach is deliberate, ensuring that the scale and texture of landscaping reflect and support the cultural landscape of Experiment Farm, which is characterised by open lawns, remnant vegetation, and a clear visual and spatial hierarchy.



Figure 11 Landscape structure plan showing the publicly accessible green spine, heritage buffer, and communal zones

[The landscape strategy demonstrates environmental compatibility by integrating a layered green structure that responds to site conditions, protects heritage curtilage, and enhances urban ecology. The publicly accessible green spine, perimeter landscape buffer, and deep soil zones retain existing canopy and enable new tree planting, improving stormwater management, microclimate, and habitat continuity. The design reinforces the site's role as a green corridor and interface between urban development and the adjacent heritage parkland].

The Tzannes design report describes the landscape as “an organising element within the site”, structured around an internal green spine and perimetral gardens that create a cohesive and accessible environment⁴². This landscape spine supports pedestrian permeability through the site while reinforcing east-west view corridors, enabling filtered views towards Hambledon Cottage. The report notes that the “strategic location of open space and tree planting acts to frame heritage views and reduce the visual mass of new buildings as perceived from surrounding public and heritage locations”⁴².

Further, the proposed planting palette draws on species present within the adjacent historic landscape and includes large native trees, consistent with those found in Harris Park and Parramatta Park, ensuring visual and ecological continuity^{116 114}. Notably, the planting layout has been structured to reinforce former allotment patterns, which strengthens the reading of the area’s early subdivision grain and reinforces cultural layering of the site.

The Visual Impact Assessment confirms that the combination of planting structure, material selection, and fencing treatment ensures a *“high degree of compatibility with the landscape character of the heritage precinct”*, particularly in maintaining the legibility of the Hambledon Cottage setting ¹¹⁶.

9. Are the building forms sensitive to heritage sightlines, avoiding silhouette impacts as detailed in visual and heritage analyses?

Yes. The Gregory Place proposal has been carefully designed to avoid adverse **silhouette impacts**, meaning it does not intrude visually into the skyline or create dominant built form outlines when viewed from sensitive heritage locations such as Hambledon Cottage and the Experiment Farm Cottage. This is distinct from solar access or overshadowing impacts, which are separately addressed and also demonstrate compliance. Both the heritage and visual impact analyses conclude that the building envelopes respond sensitively to key view corridors and silhouette profiles when viewed from these significant cultural sites.

The Tzannes Visual Impact Study (2025) demonstrates through verified photomontages that the proposed buildings do not project above the silhouette line of existing tree canopies when viewed from the grounds of Hambledon Cottage and the surrounding parklands. In the most critical views from the north and north-east, the tree canopy remains the dominant framing element, with built form visually receding due to height modulation, landscape buffers and setbacks ¹¹⁶.

Similarly, the GBA Heritage Impact Statement (2025) finds that the building forms are *“nested behind the vegetated ridge line”* and are *“designed to avoid visual encroachment on key heritage vistas.”* It further concludes that *“the sightlines between Hambledon Cottage and the broader landscape are preserved, with the development appearing recessive and screened in oblique views”* ¹¹⁴.

Design strategies contributing to this outcome include:

- Stepping building heights away from the northern edge of the site.
- Retaining and supplementing canopy trees along Gregory Place and the site’s northern boundary.
- Applying articulation, material differentiation and rooftop modulation to soften vertical massing.

Page 84 from the visual impact study which shows a comparison between the existing and proposed view from the north-east corner of the site, confirms that the proposed buildings sit below the canopy line and do not introduce competing built form silhouettes that would visually challenge heritage structures ¹¹⁶.

This careful attention to heritage view corridors reinforces the environmental and cultural compatibility of the development. The approach respects the prominence of heritage elements in the skyline and ensures that the proposal integrates into its setting without asserting dominance over these important public and heritage landscapes.

10. Has the archaeological significance of the site been appropriately considered, and have mitigation measures been proposed where warranted?

Yes. The archaeological significance of the site has been thoroughly assessed through updated Aboriginal and historical archaeological investigations. These assessments have guided the design and development response, with a strong emphasis on avoiding disturbance where feasible and embedding appropriate heritage management protocols where impact is unavoidable.

The *Historical Archaeological Heritage Impact Assessment (June 2025)*, prepared by Dominic Steele Consulting Archaeology (DSCA), concludes that while the site has experienced disturbance due to its former industrial use, there remains archaeological potential associated with nineteenth-century residential structures—specifically the footprint of Neale’s Cottage, which may retain relics of local significance. The site falls within a mapped Archaeological Management Unit (AMU 3347), and the study

recommends archaeological monitoring during initial ground works, with the potential for controlled excavation should intact deposits be identified.¹¹⁸

In parallel, the *Aboriginal Cultural Heritage Assessment Report (June 2025)*, also prepared by DSCA, evaluates the cultural values and archaeological sensitivity of the land in relation to the Parramatta Sand Body and Clay Cliff Creek. While no registered Aboriginal sites are recorded within the subject land, the site occupies a position of layered cultural importance. The report concludes that Aboriginal archaeological potential is low due to historical land use impacts but recommends implementation of mitigation measures including cultural heritage induction for workers, unanticipated finds protocols and engagement with registered Aboriginal parties throughout early construction phases.¹¹⁸

Both reports have been prepared to respond to the Planning Secretary's Environmental Assessment Requirements (SEARs) and align with the legislative framework under the *National Parks and Wildlife Act 1974* and the *Heritage Act 1977*. Where necessary, excavation permits and monitoring procedures are embedded in the site's management protocols to ensure archaeological values are protected and appropriately addressed during site works.

These combined approaches ensure that Aboriginal and historical archaeological heritage values have been considered in accordance with best practice and statutory requirements, and that appropriate mitigation and management measures are proposed and integrated into the delivery of the project.

3.6.3.1.5 Landscaping and integration with context

11. Are noise and vibration impacts compatible with the surrounding land uses, including heritage items and residential neighbours?

Yes. The Gregory Place project has been subject to a detailed acoustic assessment which confirms that both noise and vibration impacts are compatible with the surrounding residential and heritage-sensitive environment.

The *Environmental Noise and Vibration Assessment (2024)* prepared by Rodney Stevens Acoustics evaluates both construction-phase and operational noise scenarios, including cumulative impacts from mechanical plant, traffic generation, communal uses, and future construction activities. The assessment applies criteria derived from the *NSW Noise Policy for Industry*, the *Interim Construction Noise Guideline*, and *Australian Standard AS1055* for noise in residential zones.

The report concludes that, subject to standard mitigation and management controls, the development is capable of complying with applicable noise and vibration criteria. For construction, this includes limits on high-noise activities during sensitive periods, use of noise barriers and enclosures, and scheduling to avoid overlap of high-noise plant operation. Importantly, vibration impacts on heritage fabric—particularly structures within the Hambledon Cottage and Experiment Farm precincts—were assessed as negligible under the proposed methodology, which avoids deep piling or impact-based equipment in sensitive zones.

Operationally, the design incorporates acoustic treatment of mechanical plant and car park exhausts, residential glazing specifications based on orientation and exposure, and location of communal facilities away from the most sensitive interfaces. These treatments ensure compliance with internal noise amenity targets and external emission limits.

¹¹⁸ Appendix R - Dominic Steele Consulting Archaeology, *Historical Archaeological Heritage Impact Assessment – 2A Gregory Place, Harris Park*, June 2025.

Overall, the proposal achieves acoustic compatibility through both site-responsive design and embedded mitigation measures. These ensure that noise and vibration effects are minimised and consistent with residential amenity and heritage conservation expectations.

12. Does the development incorporate effective mitigation of urban heat island effects through landscape, materials, and design strategies?

Yes. The Gregory Place development incorporates a suite of built form and landscape design strategies specifically targeted at mitigating urban heat island (UHI) effects and supporting thermal comfort outcomes at both site and neighbourhood scales.

The *design report (2025)* confirms that a significant proportion of the site footprint is dedicated to deep soil zones and landscaped areas, with a particular emphasis on tree canopy coverage at ground and podium levels. Approximately 33 per cent of the site is landscaped, and 27 per cent is deep soil planting, enabling the establishment of mature trees and low-lying vegetation that provide extensive shade and evapotranspiration benefits ⁴².

Hard surfaces across the site—including footpaths, internal lanes and roof terraces—have been specified with low solar absorptance materials to minimise heat retention. Paved areas are articulated with shade structures, planting beds, and water-permeable materials to further reduce surface temperatures ⁴².

The built form adopts high-performance glazing and light-coloured façade treatments to reduce solar gain, with eaves and shading devices integrated into building facades to shield exposed elements during peak solar periods. The Tzannes design documentation further confirms that rooftop communal spaces incorporate planting beds, shade pergolas, and light-toned pavers as part of the passive climate response ⁴².

The landscaping strategy—developed in conjunction with the architectural scheme—includes native and climate-resilient tree species selected for canopy spread, resilience to extreme temperatures, and contribution to urban biodiversity. These elements are integrated along site boundaries, pedestrian corridors and within courtyards, forming a coherent green infrastructure network that improves local microclimate conditions ⁴².

In summary, the development demonstrates a deliberate, layered response to urban heat island mitigation, combining landscape design, material selection and building performance strategies in accordance with best practice design guidance. This approach enhances the comfort of future residents, supports surrounding streetscape cooling, and aligns with the sustainability principles established for precinct-scale planning in Harris Park.

3.6.3.1.6 Materials and finishes

13. How have chosen materials and finishes been explicitly justified to demonstrate visual harmony with the adjacent heritage and local urban contexts, and how do they contribute to reducing visual prominence and ensuring subtle integration within the surrounding heritage environment?

The proposed materials and finishes for the Gregory Place development have been carefully selected to ensure visual harmony with the adjacent heritage items, including Hambledon Cottage and Experiment Farm, as well as the broader Harris Park locality. The palette reflects a deliberate strategy of muted, natural, and textural tones to support a recessive and respectful built form expression.

The Tzannes design report (2025) identifies that the selection of brickwork, off-form concrete, and fine metal detailing draws upon local heritage cues while maintaining a contemporary architectural language. This is evidenced in the use of face brick in earthy tones that echo traditional masonry buildings within

the heritage precinct, and in the scale and detailing of reveals, awnings, and balustrades, which are calibrated to reflect the fine-grained rhythm of adjacent residential and heritage structures ¹¹³.



Figure 12 Character and material palette

A key feature of the strategy is the emphasis on low-reflectivity, natural finishes that reduce glare and blend with the surrounding landscape. These materials are strategically placed: darker glazed bricks are used in recessive base treatments, while lighter red bricks articulate upper storeys, enhancing the sense of depth and visual layering. The application of tonal variation within the brickwork and the incorporation of shadow-casting elements such as deep window reveals and blade fins serve to visually modulate the building mass and reduce bulk perception.

As the Heritage Impact Statement observes, *“the proposed materiality supports a contextual relationship through texture, tone and articulation, ensuring the development reads as a background element to key heritage forms.”* The report further acknowledges that *“visual prominence is minimised through material restraint and proportional treatment of the façade elements.”* ¹¹⁴

The use of precast concrete and matte-finish materials is limited to areas of greater setback and lower visibility, with active frontages and heritage interfaces treated with tactile, pedestrian-scaled finishes. This balance between robust and delicate elements is further supported by landscape treatments, including planters and green wall features, that soften edges and mediate transitions between built form and the public domain.

“The materials chosen are durable, sustainable, and reflective of the historical and cultural context. Masonry materials like low carbon brick, concrete, and steel are prioritised to ensure they complement the surrounding landscape, blending seamlessly with natural elements such as stone and timber. High-

quality, resilient materials are selected that require minimal maintenance and are designed for a minimum 100-year life”¹¹³.

The visual hierarchy within the material application is also reinforced by the landscape design, which frames the built forms with soft planting and establishes clear sightlines that defer to significant heritage vistas. The combined design strategies create a built environment that recedes into its leafy setting rather than competes with it, providing a respectful contemporary layer within the evolving Harris Park context.

In summary, the materials strategy is one of considered restraint and contextual referencing, designed to support integration rather than contrast. It draws on best-practice urban design principles for infill within heritage settings.

3.6.3.1.7 Visual and perceptual integration

14. How does the landscaping strategy support and enhance the site’s environmental and heritage compatibility, including the setting of Hambledon Cottage and the City Cliff Creek corridor?

The landscaping strategy for the Gregory Place development is integral to its environmental and heritage compatibility, functioning not only as an amenity layer but also as a mediating device that supports the visual and ecological integration of new built form within a sensitive heritage context.

As documented in the Tzannes design report and confirmed in the Statement of Heritage Impact, the site’s landscape design is structured around three key public green corridors that intersect the development and provide strong visual and physical connectivity between the proposed buildings, Hambledon Cottage, and the surrounding public domain. These green corridors comprise:

- A northern interface buffer adjoining Hambledon Cottage, retaining and supplementing canopy vegetation to preserve the open garden setting and curtilage views.
- A central pedestrian green spine that establishes a view corridor from the Cottage toward the south-east portion of the site, enhancing sightlines through layered planting and stepped building setbacks; and
- A southern edge treatment addressing the City Cliff Creek channel, which includes a shared pedestrian zone, WSUD features, and restored riparian planting to support ecological function and minimise erosion.^{113 114}

These elements are reinforced by a landscape palette that favours endemic species and layered planting types. Shrubs and groundcovers are selected to maintain low-profile view lines, while canopy trees are strategically located to frame sightlines and provide shade without dominating the heritage skyline. As shown in the Landscape Concept Plan and planting schedules, species selection favours those historically present in the area, creating a sense of continuity and local identity.⁴²

In addition to ecological outcomes, the landscaping is deliberately designed to modulate built form impacts and promote permeability. Fencing is minimised and low-scale where required, and plantings are used to soften transitions between public and private realms, particularly near heritage curtilages. This strategy is noted in the Heritage Impact Statement as contributing to a *“soft visual edge that is both transparent and historically appropriate.”*⁴³

Crucially, the strategy responds to the topography and natural hydrology of the site, reinforcing existing drainage patterns and integrating swales and bioretention zones. This reduces runoff and improves water quality entering the creek corridor, ensuring environmental enhancement is achieved in parallel with heritage protection.

15. How does the project ensure public accessibility and legibility of landscape and heritage features across the site, including visual and physical connections to Hambledon Cottage and the Experiment Farm precinct?

The Gregory Place project has been designed to preserve and enhance public accessibility and the legibility of heritage and landscape elements across the site. This is achieved through a combination of spatial planning, landscaping treatments and visual framing techniques that prioritise open view corridors, cultural visibility, and pedestrian permeability.

The Tzannes design report identifies the site's central organising spine and east–west links as critical elements in framing views towards Hambledon Cottage and the broader colonial landscape. The arrangement of buildings consciously avoids view obstruction, instead setting back massing and using podium landscaping to open vistas towards heritage features and reinforce their prominence within the site's visual hierarchy ^{113 114 116}.

The integration of the City Cliff Creek corridor and the landscaped pedestrian pathway through the site functions as both a public circulation element and a visual corridor, connecting the site's internal spaces with the wider Harris Park precinct and heritage anchors such as the Experiment Farm Cottage. These green spines are supplemented by accessible entries and at-grade transitions, ensuring full mobility access throughout the public realm and around key site edges ¹¹⁶.

The Statement of Heritage Impact supports this strategy, noting that the development “retains open spatial relationships between heritage items and their settings,” and that “*visual connections to Hambledon Cottage are reinforced through alignment and setback*” ¹¹³. This is further strengthened by low-scale boundary treatments, integrated path networks and forecourt areas that frame rather than isolate the heritage setting.



Figure 13 Landscape setting and public domain integration – Gregory Place central spine

[Figure 13 Landscape setting and public domain integration – Gregory Place central spine perspective illustrates the central north–south pedestrian spine running through the Gregory Place development. The image highlights the key features of the integrated public domain strategy, including large canopy tree retention and planting, a shared and legible pathway network, and the careful curation of built form edges to maximise passive surveillance and amenity. The built form is consciously set back to allow for generous public realm interface, while outdoor seating, low walls, and ground-level activation support social connection and place-making outcomes. This setting reinforces the compatibility of the proposal with the leafy character of Harris Park and the civic setting of Hambledon Cottage].



Figure 14 Landscape connectivity and access diagram – pedestrian and cycle linkages

[Figure 14 Landscape connectivity and access diagram – pedestrian and cycle linkages maps the proposed movement network and landscape integration strategy across the site. Primary and secondary pedestrian spines are shown in orange and yellow, respectively, with cycle paths, landscaped buffers, and permeable green corridors threading through the site. The design ensures that access is available from multiple perimeter points, with direct visual and physical connections to the surrounding street grid and adjacent heritage curtilage. The figure also illustrates the project’s role in connecting City Cliff Creek to surrounding green assets and reinforces the site’s function as a transitional space between urban and heritage settings].

Additionally, the Aboriginal Cultural Heritage Assessment highlights the opportunity for integrated interpretive elements and signage along key pedestrian routes and green corridors. These measures will support cultural storytelling and ensure that connections to Country and Aboriginal cultural knowledge are maintained and made visible within the built environment.

“The landscape narrative extends dynamically through the site and architecture, echoing the textures of the original chain of ponds and historic mudflats. At ground level, human interaction peaks along the through-site link—a bustling corridor that anchors the landscape to daily life. Here, sparse planting accommodates movement while drawing people into the experience of Country. Moving away from this central spine, the landscape thickens into secluded areas that mirror the natural transitions of untouched ecologies”⁴².

In summary, the development’s spatial and landscape strategy provides clear legibility and accessible circulation across the site while enhancing the visibility and experience of key heritage assets.

3.6.3.2 Theme 1 compatibility summary: Urban character and visual compatibility

The preceding analysis under Theme 1 demonstrates that the proposed development at Gregory Place exhibits a high level of compatibility with its surrounding context when considered through the lens of urban character and visual integration. Drawing upon the comprehensive responses to Questions 1 to 14, it is evident that the proposal has been carefully designed to both acknowledge and sensitively respond to its heritage-adjacent and urban infill setting.

Key elements of compatibility have been established through:

- **Built form and scale** that is consistent with the desired future character of the precinct, exhibiting appropriate massing transitions and fine-grain articulation to relate to both neighbouring heritage items and contemporary development.
- **Visual impact minimisation**, achieved through calibrated view corridors, sightline testing, and recessive material treatments that avoid silhouette impacts and protect the setting of Hambledon Cottage and the broader Harris Park heritage landscape.
- **Materiality and finishes** that reflect the textures, tones and detailing of the local heritage and civic context, ensuring the development reads as a contextually embedded and visually restrained addition to the urban fabric.
- **Landscape and connectivity strategies** that strengthen the permeability, accessibility and environmental performance of the site, while reinforcing the tree-dominated visual character that defines the local setting.

The cumulative design response addresses each of the analytic prompts in a clear and robust manner. It has been substantiated by a suite of expert inputs including architectural, heritage and visual impact assessments, all of which affirm that the project can coexist harmoniously within its context, and that it advances a legible and respectful built outcome.

In this way, the proposal satisfies the compatibility expectations of the Housing SEPP division 5 framework, as well as the principles established in *Project Venture Developments v Pittwater Council* [2005] NSWLEC 191, which remain a cornerstone for assessing built form compatibility. The project achieves a balanced and evidence-led integration of new development within a sensitive and historically significant locality.

3.6.3.3 Theme 2 analysis: Heritage conservation and compatibility

3.6.3.3.1 Heritage values and interpretation

1. How does the proposed development explicitly respect and reinforce the heritage significance of Elizabeth Farm, Hambledon Cottage, and Experiment Farm in accordance with statutory heritage requirements and strategic heritage assessments?

The proposed development at Gregory Place has been expressly formulated to respect and reinforce the heritage significance of three principal heritage items: Elizabeth Farm, Hambledon Cottage, and Experiment Farm. These properties, all listed on the State Heritage Register, are recognised for their outstanding historical and associative values. The planning and design process has been guided by clause 5.10 of the Parramatta Local Environmental Plan 2011 and the principles of the NSW Heritage Manual, as well as the criteria outlined in the *Burra Charter* for managing change within significant heritage contexts.

According to the *Statement of Heritage Impact* the scale, form and landscape configuration of the development has been directly informed by an understanding of the spatial relationships and curtilage sensitivities associated with nearby heritage places. Specifically, the proposal includes increased setbacks and a reduction in building scale adjacent to Experiment Farm and Hambledon Cottage to ensure the development is “*recessive when viewed from these heritage settings*” and *does not visually intrude upon or dominate their established curtilages or sightlines*”⁴³.

In relation to Elizabeth Farm, although physically more distant, the heritage assessment affirms that the visual catchment from that site is not adversely impacted due to topography, vegetative screening, and

built form modulation. Importantly, the development does not introduce any built elements into the primary outlooks from Elizabeth Farm’s garden terraces, which are considered integral to its significance.

The GBA assessment further states that “*the stepped building massing, articulated roof forms and fine-grained modulation assist in reducing perceived scale, reinforcing a sympathetic visual character that sits comfortably with the surrounding historic context*” and maintains a subservient presence to the dominant heritage items ⁴³.

Moreover, the development preserves important historical spatial relationships by avoiding any built form within the historic boundaries or interpreted lines of view between these sites, and complements this with a considered landscape treatment that reflects the rural-urban character historically associated with these lands. This includes proposed tree planting and pedestrian connections that align with historic access paths and sightlines.

In doing so, the project satisfies the requirements of the Parramatta LEP 2011 and the *Heritage Act 1977*, while achieving a contextual design outcome in line with the *Roseth v Wollongong City Council* principles, which emphasise that new built forms should “coexist in harmony with the heritage significance of the precinct” rather than replicate or dominate it.

2. Does the design explicitly include interpretive strategies or elements to enhance public understanding and appreciation of the historical and Aboriginal cultural heritage context?

Yes. The proposal incorporates a suite of interpretive design strategies to deepen public appreciation of both colonial and Aboriginal heritage values. These are outlined in the *Comprehensive Harris Park Colonial Precinct Heritage Assessment and Statement of Significance* and further supported by the Aboriginal Cultural Heritage Assessment (June 2025) ¹¹⁸.

Public domain upgrades, including new pedestrian linkages and heritage-informed landscaping, are integrated with interpretive installations, signage and paving treatments that reflect the historical narratives of Experiment Farm and Hambledon Cottage. As noted in the heritage report, “*interpretive opportunities will be embedded in the materiality and arrangement of the public realm—such as heritage timelines, cultural symbols and quotations—providing layered readings of place for residents and visitors alike*” ¹¹⁴.

In addition, the landscape concept incorporates interpretive gardens that draw on the productive garden typologies historically present at the adjoining colonial estates, including native and introduced plantings arranged in geometric patterns. These elements contribute to the educational value of the precinct and reinforce the historic land use patterns of the site ¹¹⁹.

The Aboriginal Cultural Heritage Assessment also proposes interpretive artworks and installations co-designed with Traditional Custodians, focusing on the enduring cultural connections of the Burramattagal people to the Parramatta River corridor. This approach ensures that the significance of Country is conveyed through design, not only as a static narrative but as a living connection to landscape ⁴².

3. How effectively does the proposal protect, enhance, or interpret identified Aboriginal cultural heritage values as articulated through Aboriginal stakeholder consultation and the heritage assessments?

The Aboriginal Cultural Heritage Assessment (ACHA), prepared in June 2025 ¹¹⁸, is grounded in an extensive program of consultation with Registered Aboriginal Parties (RAPs) and aligns with the Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW. The findings confirm that while no

¹¹⁹ Tzannes, *Design Report – Gregory Place Harris Park*, Revision 12, July 2025, pp. 92–94

surface artefacts were identified within the development footprint, the broader precinct is imbued with intangible cultural significance, particularly as part of the Parramatta River corridor, a key element in traditional travel, resource use and cultural connection.

The ACHA states that *“the land holds meaning as part of a cultural landscape of continuous use and significance to the Burramattagal people,”* and notes that the development presents an opportunity to reflect this through landscape, art and design interventions ¹¹⁸.

The project responds to these values through: retention and interpretation of cultural landscapes, particularly through the planting of endemic species and symbolic design of green corridors; integration of artwork and markers that convey cultural stories, places and language within the public realm; and inclusion of Aboriginal voices in the co-design of interpretive material and in shaping the narrative presented on site.

The proposal also ensures that future excavation and earthworks are subject to appropriate due diligence procedures and monitoring, in accordance with the ACHA recommendations and the National Parks and Wildlife Act 1974.

This layered and responsive approach ensures the proposal not only avoids adverse impact to Aboriginal cultural heritage but contributes to its public understanding and long-term interpretation.

3.6.3.3.2 Visual relationships and heritage sightlines

4. How specifically does the development protect significant views and sightlines identified as critical to appreciating heritage items, including those views identified in heritage and visual impact assessments?

The proposed development has been carefully designed to preserve significant heritage sightlines, particularly those associated with Hambledon Cottage, Elizabeth Farm, and Experiment Farm. The *Gregory Place Visual Impact Assessment* identifies a range of key view corridors and heritage-sensitive outlooks, including long views from the northern portion of the Experiment Farm ridge and immediate visual connections from the gardens of Hambledon Cottage.

Building forms have been set back and articulated to avoid direct intrusion into these sightlines. As noted in the assessment, *“modulation in building volume and the stepped arrangement of upper levels ensures that no key view lines toward the heritage item or across its landscape setting are unreasonably interrupted.”* ¹¹¹

The *Statement of Heritage Impact* supports this conclusion, observing that *“views from within the curtilage of Hambledon Cottage, and those directed eastward across the Experiment Farm lands, remain legible and uninterrupted by the proposed built form.”* ¹¹⁴

5. Does the visual impact assessment demonstrate explicitly how the proposed built form avoids visual intrusion or dominance from heritage-sensitive viewpoints such as Elizabeth Farm, Hambledon Cottage, and Experiment Farm?

Yes. The Visual Impact Assessment provides detailed photomontages demonstrating that the proposal avoids visual dominance from key heritage vantage points. For example, in the montage taken from the Elizabeth Farm garden fence line, the development reads as a recessive backdrop beyond the dense landscape buffer. In the Hambledon Cottage and Experiment Farm outlooks, the development is either screened or perceived as low-scale due to the topography and setbacks.

The report concludes that *“the building presents a reduced bulk and scale when viewed from primary heritage locations, aided by its material palette, articulated façades and deep landscape buffers.”* ¹¹⁴ The

built form has been purposefully designed with a gradation in height to limit its visibility and prominence in those views that intersect with or extend across heritage landscapes.

6. Have photomontages or visual analyses confirmed the preservation of visual connections to heritage items and their landscapes from public vantage points?

Yes. A suite of photomontages has been prepared by Tzannes and included within the Visual Impact Assessment to demonstrate the project's performance relative to public and heritage-sensitive view locations.

These photomontages in the report confirm that while the development is visible in some contexts, it does not obstruct or dominate views of the heritage items, nor does it compete with their prominence. The GBA Heritage Impact Statement concurs, stating: *“view sharing and visual compatibility principles have been upheld through a combination of topographic sensitivity, view corridor retention and strategic landscape reinforcement.”*¹¹⁴

Accordingly, the documentation affirms that the proposed development achieves a high standard of visual compatibility with the heritage precinct, retaining and respecting key visual connections from both public and private heritage settings.

3.6.3.3.3 Scale, setbacks, and heritage curtilage

7. Does the scale of the proposed buildings explicitly demonstrate an appropriate and sensitive transition to adjoining heritage items, as evidenced through heritage impact analysis?

Yes. The proposed development has been deliberately scaled to create a sensitive transition to the adjacent heritage items, most notably Hambledon Cottage and Experiment Farm. As outlined in the *Statement of Heritage Impact*, *“the scale of the buildings has been modulated to ensure a gradual shift from the low-scale heritage landscapes to the emerging higher density built form along Parkes Street and the eastern urban edge”*¹¹⁴.

The built form strategy incorporates a campus-like composition of buildings with varied heights and volumes. Lower-rise elements are positioned closest to heritage interfaces, particularly along the Experiment Farm and Hambledon Cottage boundaries. These elements adopt a mid-rise typology of 3 to 5 storeys with articulated setbacks and deep landscape buffers to reinforce visual compatibility and minimise bulk impact.

The *Visual Impact Assessment* supports this interpretation, noting that *“a legible transition in height is evident across the site, avoiding abrupt massing near heritage-sensitive boundaries and achieving appropriate scaling relative to neighbouring historic structures.”*¹¹⁴

In addition, the topographical setting of the site—sloping away from Hambledon Cottage—allows for the integration of higher built elements without overwhelming the heritage curtilage. The design harnesses this natural level change to reduce perceived building height and to recess taller forms behind screening vegetation and lower buildings.

8. How have setbacks specifically been designed to protect and reinforce heritage curtilages, particularly regarding Hambledon Cottage and Experiment Farm?

Setbacks have been carefully calibrated to reinforce the spatial definition of the adjoining heritage curtilages, ensuring that the built form does not encroach visually or physically on the settings of Hambledon Cottage and Experiment Farm. The *Statement of Heritage Impact* confirms that *“substantial setbacks have been adopted along the northern and western site boundaries, aligning with the historic landscape patterns of Experiment Farm and maintaining clear spatial separation between the development and heritage items.”*¹¹⁴

This approach respects the visual and cultural integrity of the heritage curtilages by maintaining open landscape zones and utilising landscape design to buffer and frame the historic settings. The setbacks also allow for the retention of existing vegetation and the introduction of complementary plantings that reflect colonial-era garden palettes, further reinforcing the heritage character of the precinct.

From Hambledon Cottage in particular, the development maintains a considerable horizontal distance, ensuring that the view lines across the historic grounds remain uninterrupted. The combination of physical setbacks, landscaped margins, and reduced height elements at the interface ensures that the heritage setting remains legible and cohesive.¹¹⁶

9. Do setbacks and landscape buffers clearly contribute to the preservation and interpretation of heritage spaces and their cultural landscape context?

Yes. Landscape buffers and setbacks serve a dual role in both preserving the physical context of heritage spaces and enhancing their interpretive value within the urban environment. As the *Visual Impact Assessment* explains, “the layered landscape edge along the northern and eastern boundaries not only softens the built form but actively restores a visual rhythm consistent with the open landscapes of the historic Experiment Farm precinct.”¹¹⁶

This strategic landscaping reinforces the historical garden typologies and views across colonial farmland, allowing residents and visitors to appreciate the spatial relationships between built and natural elements in the heritage context. Additionally, landscape treatments within the setback zones are informed by historical precedents and designed to enhance wayfinding, interpretation, and the experiential connection with heritage items.

Importantly, this strategy aligns with the guidance from the HC, which in its 2023 submission noted that “retention of heritage landscape characteristics and generous setbacks will be critical to ensuring the continued interpretation of this historically layered precinct.”¹²⁰

Together, these elements demonstrate that the proposed development does not merely avoid negative heritage impacts but positively contributes to the preservation and interpretation of the area’s cultural landscape values.

3.6.3.3.4 Materials, finishes, and architectural articulation

10. How do selected building materials and finishes explicitly respond to the materiality, colour palettes, and textures of adjacent heritage buildings and landscapes?

The material selection for the Gregory Place development is deliberately informed by the surrounding heritage context, with an emphasis on complementary tones, natural textures, and restrained finishes. The *Gregory Place Visual Impact Assessment* states that “a subdued palette of face brickwork, pre-cast concrete, and metal screening has been adopted to reflect the muted, earthy tones characteristic of colonial-era buildings in the precinct”¹¹⁶.

This approach is intended to create a quiet backdrop that allows heritage items such as Hambledon Cottage and Elizabeth Farm to maintain their visual primacy. Rather than introducing starkly modern or contrasting finishes, the proposal employs naturalistic colours and materials—particularly warm-toned brick and matte finishes—selected for their low reflectivity and compatibility with surrounding landscape hues and heritage masonry.

GBA’s *Statement of Heritage Impact* explicitly supports this selection, noting that “the proposed materials avoid discordant colouration and are analogous to the fabric and finishes of adjacent heritage buildings without mimicking their construction methods.”¹¹⁴ The materiality is particularly sensitive to

¹²⁰ Heritage NSW, *Heritage Council Submission to DPE on HCAC Resolution*, July 2023, p. 2.

the sandstone tones and painted timber detailing of the local Georgian cottages, while also enabling a contemporary yet respectful architectural identity.

11. Does the architectural articulation demonstrate explicit sensitivity to heritage building forms, rhythms, and detailing, without attempting inappropriate mimicry?

Yes. The architectural composition of the proposal demonstrates a sensitive response to the scale, modulation, and fenestration patterns typical of the surrounding heritage buildings. Importantly, the design avoids literal replication or pastiche, instead taking cues from the proportions, order, and articulation strategies found in the adjacent heritage fabric.

The facades are articulated with deep reveals, vertical rhythm, and expressed parapets that echo the massing and symmetry of colonial cottages. The use of solid-to-void ratios and rhythmically spaced windows is aligned with the formal characteristics of buildings like Hambledon Cottage and Experiment Farm House. As described in the *Visual Impact Assessment*, “the articulation of the façade draws on the compositional order of Georgian architecture—balance, repetition, and hierarchy—without reproducing historical motifs.” ¹¹⁶

This approach satisfies the principle of respectful differentiation articulated in both the Burra Charter and the Roseth decision, which discourages false historical referencing while requiring clear visual coherence with the heritage context.

12. Are the proposed architectural forms and façades demonstrably designed to complement heritage items, ensuring visual compatibility and respectful differentiation?

Yes. The proposed built form adopts a campus-style massing strategy with varying volumes that step and taper to align with the grain of the surrounding heritage context. The buildings are grouped to reinforce view corridors and avoid continuous massing, while articulation breaks, setbacks, and roof treatments reduce bulk perception. The *Statement of Heritage Impact* confirms that “the architectural forms are legible as contemporary interventions that complement the scale and rhythm of adjacent heritage items” ¹¹⁴.

Crucially, the proposal differentiates new from old without compromising coherence. As the Tzannes *Visual Impact Assessment* explains, “visual compatibility has been achieved through the consistent use of appropriate materials, controlled bulk, and modulation that reflects the domestic scale of surrounding historic dwellings.” ¹¹³

This balance of distinction and respect ensures the new development coexists with, rather than overwhelms, the local heritage fabric.

3.6.3.3.5 Integration with heritage landscape

13. Does the landscaping plan explicitly demonstrate sensitivity to heritage plantings, gardens, and historic landscapes in adjacent heritage sites?

Yes. The proposed landscaping strategy is deeply informed by the historic landscape patterns and botanical character of the Harris Park precinct. Although no formal JMD landscape plan was submitted, the design rationale and accompanying visual assessments clearly articulate how the planting scheme responds to the landscape setting of nearby heritage items, including Elizabeth Farm, Hambledon Cottage, and Experiment Farm.

According to the *Gregory Place Visual Impact Assessment*, the proposal integrates a layered and transitional planting structure, with canopy trees and mid-storey planting selected to echo the spatial rhythm and botanical typologies evident in colonial estates. Specifically, the assessment notes:

“The planting strategy references the historic plantings found in the broader Parramatta River cultural landscape—spotted gums, jacarandas, and fig species—while introducing buffer vegetation that visually softens the building form from surrounding heritage outlooks.” ¹¹⁶

Furthermore, the spatial composition of gardens and courtyards within the proposal pays homage to the compartmentalised and productive landscapes historically found in the precinct, such as kitchen gardens, vine trellises, and orchard rows, though interpreted in a contemporary residential context.

14. How do proposed new landscape elements explicitly complement and enhance the existing heritage landscape patterns and views identified in heritage assessments?

The new landscape elements have been arranged to reinforce key view corridors and support legibility of the site’s relationship to adjacent heritage items. As identified in both the *Visual Impact Assessment* and *Statement of Heritage Impact*, a deliberate emphasis has been placed on:

- Preserving the east–west view alignment from Parkes Street toward Hambledon Cottage.
- Providing perimeter tree planting that frames, rather than obstructs, long views toward the Experiment Farm ridge.
- Avoiding massed vegetation that would screen or diminish heritage sightlines.

The planting palette is comprised of native and culturally resonant species that reflect the precinct’s colonial and Aboriginal plant associations. As the heritage consultants affirm:

“The soft landscape scheme complements and reveals the heritage setting, rather than occluding it. The approach supports heritage significance through visual framing, layering, and continuity with historic plant typologies.” ⁴²

This ensures the new landscaping enhances spatial and visual continuity with heritage landscape character, reinforcing the precinct’s sense of place.

15. Has the proposal ensured the retention and appropriate integration of significant heritage trees and plantings identified in expert arboricultural and heritage landscape studies?

Yes. The retention and treatment of significant trees has been guided by the arboricultural findings and integrated heritage landscape analysis included in the *Historical Archaeological Heritage Impact Assessment* and supplementary submission responses.

Notably, mature fig trees and remnant landscape specimens along the northern boundary—identified as contributors to the setting of the Experiment Farm heritage item—have been retained and protected. These trees serve both ecological and heritage functions, anchoring the development within a vegetated frame that respects the historic treed skyline.

The *Visual Impact Assessment* further confirms:

“Existing significant trees have been preserved where possible, with new plantings reinforcing the native and colonial landscape themes evident throughout the Harris Park precinct.” ¹¹⁶

Additionally, the proposal avoids excavation or site works within the root protection zones of heritage-significant vegetation, demonstrating alignment with best-practice heritage arboriculture protocols.

In addition, the proposal incorporates the recommendations of the Historical Archaeological Heritage Impact Assessment prepared by DSCA. This includes protection of potentially sensitive archaeological zones and heritage trees through delineated construction exclusion areas and monitoring protocols. The report identifies several areas of archaeological potential and recommends that “existing mature trees of heritage value along the southern and eastern boundaries be retained wherever feasible, with

excavation buffered and managed under archaeological supervision" ¹¹⁸. These findings have directly informed the project's approach to integrating significant landscape elements into the overall design, reinforcing the visual and historical continuity of the broader precinct.

3.6.3.3.6 Impact management and mitigation

16. What explicit heritage impact mitigation measures have been integrated into the design to ensure any potential adverse impacts are effectively avoided or minimised?

The proposal has incorporated a comprehensive suite of heritage impact mitigation measures through an iterative design process underpinned by expert advice and regulatory feedback. These measures include:

- **Refinement of height and bulk:** As outlined in the GBA *Statement of Heritage Impact*, height reductions and building modulation were introduced following feedback from the HC and independent design review panels. ¹¹⁴ These modifications reduce visual competition with nearby heritage items and lower the risk of silhouette impacts across heritage landscapes.
- **Increased setbacks and landscape buffers:** The scheme includes deep setbacks along boundaries adjacent to Experiment Farm and Hambleton Cottage, supplemented with substantial vegetation buffers. These setbacks directly respond to recommendations in the *Visual Impact Assessment* and support the maintenance of heritage curtilage, views, and character. ¹²¹
- **Sensitive façade treatment and materiality:** The use of a muted, recessive material palette, along with deep articulation of the façades, serves to minimise visual prominence and reinforces contextual compatibility with heritage forms. This approach is emphasised by both Tzannes and GBA as an essential mitigation strategy. ^{114 116 113}
- **Visual screening and sightline preservation:** Photomontages confirm that the built form has been carefully positioned to limit its visibility in key public domain and heritage outlooks. Landscape mounding and tree retention contribute to the softening of built edges in critical view corridors. ^{113 114}
- **Staging and monitoring controls:** Archaeological advice from DSCA recommends archaeological supervision and exclusion zones in parts of the site identified as potentially sensitive. The planning pathway will incorporate these recommendations as consent conditions.

¹¹⁸

These measures demonstrate that heritage protection is embedded in the proposal's structure rather than applied post-design. The design evolution shows clear alignment with the principles of the NSW Heritage Manual and the *Burra Charter*, particularly in avoiding adverse impacts where possible and mitigating those that remain through integrated design responses.

17. How effectively does the design explicitly incorporate recommendations from the NSW Heritage Council and heritage advisers, demonstrating responsive design refinements?

The design for the Gregory Place development has demonstrably incorporated expert recommendations from the HC, heritage officers, Aboriginal stakeholders, and independent heritage consultants. These recommendations have shaped fundamental changes to built form, scale, landscaping, and interpretive strategy, ensuring the development responds to the precinct's layered heritage context.

The HC and its Heritage Council Archaeology Committee provided formal commentary on the initial proposal and further advice during the Response to Submissions process. As set out in the Heritage Council's submission dated 12 May 2023, the Heritage Council advised that "*the scale of development*

¹²¹ Tzannes, Gregory Place Visual Impact Assessment, July 2025, pp. 84, 173.

*must ensure that view corridors from the State heritage items remain legible” and that “development must not dominate or visually compete with the significance of the colonial estates.”*¹²² These comments were echoed in earlier resolution advice issued by the HCAC on 27 September 2022, which emphasised the need for *“topographic sensitivity” and the “retention of a visual relationship between Elizabeth Farm and Experiment Farm.”*¹²³

In response, the development team, in close coordination with GBA Heritage, made targeted design revisions that are now embedded in the current scheme. These include:

- **Stepped building forms and reduced overall height:** The revised proposal avoids the ridge line and upper terraces identified as sensitive in visual and heritage assessments.¹¹⁶
- **Refinement of setbacks and edge treatments:** As discussed in the *Statement of Heritage Impact*, setbacks have been calibrated to align with historical alignments and preserve curtilage visibility, especially along the Experiment Farm interface.¹¹⁴
- **Material palette and colouration adjustments:** The façade strategy was adjusted to incorporate recessive tones and articulated elements that echo, without mimicking, the textures and shadowing found in nearby heritage structures. This change followed feedback from the Heritage Council’s advisers regarding visual integration with Hambledon Cottage and Elizabeth Farm.¹¹⁴
- **Interpretive and archaeological responses:** The advice of DSCA and Heritage NSW regarding the likely presence of archaeological material—possibly including remnants of Neil’s Cottage—was heeded in the form of new precautionary protocols for ground disturbance and the preservation of specific zones as potential archaeological areas.¹¹⁸

This suite of design amendments illustrates a genuine responsiveness to heritage advisory input. Rather than treating heritage as a constraint to be managed, the proponent has used expert commentary as a catalyst for design improvement and heritage-led placemaking.

18. Does the proposal explicitly demonstrate compliance with heritage conservation incentives and statutory heritage management plans as required under clause 5.10 of the Parramatta LEP 2011?

Yes. The proposed development demonstrates clear and sustained compliance with the statutory requirements of clause 5.10 of the *Parramatta Local Environmental Plan 2011*, which governs heritage conservation. This clause requires that development in the vicinity of heritage items be undertaken with regard to their significance, and mandates that development not adversely affect the heritage significance of listed items or heritage conservation areas. The compliance pathway has been clearly articulated and addressed in the *GBA Statement of Heritage Impact*, the *DSCA Archaeological Heritage Impact Assessment*, and supporting materials submitted as part of the RFI response.

Clause 5.10(4) requires that *“development consent must not be granted for development on land in the vicinity of a heritage item unless the consent authority is satisfied that the development will not have an adverse effect on the heritage significance of the item.”*¹²⁴ In this regard, the *Statement of Heritage Impact* concludes:

¹²² Heritage NSW, Submission to Department of Planning – Gregory Place, 12 May 2023, pp. 1–2

¹²³ NSW Heritage Council Approvals Committee, *Resolution on Gregory Place*, 27 September 2022.

¹²⁴ Parramatta Local Environmental Plan 2011, clause 5.10(4).

*“The proposed development has undergone iterative design changes and consultation to ensure that it does not diminish, and in fact helps reinforce, the heritage significance of surrounding items including Elizabeth Farm, Hambledon Cottage, and Experiment Farm.”*¹¹⁴

In addition, clause 5.10(5) refers to heritage conservation incentives. While the proposal does not seek any financial or density-based incentive under this clause, it nonetheless promotes conservation outcomes through careful urban design, interpretive strategies, and contribution to public realm enhancement. These outcomes include:

- **Landscape restoration and view corridor preservation:** Sightlines and curtilage relationships have been protected, consistent with best practice heritage policy.
- **Public interpretation:** The proposal includes new opportunities for interpretation of the area’s colonial and Aboriginal heritage, with zones earmarked for heritage signage and potential archaeological exhibition.
- **Archaeological management:** The DSCA report confirms that “*precautionary management zones*” will be established, and appropriate archaeological permits and monitoring will be secured under the Heritage Act 1977.¹¹⁸

The site is not subject to a heritage conservation area or a formal conservation management plan (CMP) under the LEP. However, the GBA Statement and associated reports align with the aims and principles of the NSW *Heritage Manual*, the *Burra Charter*, and ’s strategic heritage documents. These include the *Comprehensive Harris Park Colonial Precinct Heritage Assessment*, which identifies the broader contextual heritage values of the locality. The proposal aligns with that assessment’s recommendation for “*recessive and well-articulated built form to reinforce the precinct’s layered historic character.*”¹¹⁴

In sum, the development adheres to clause 5.10 and relevant planning instruments, both in statutory compliance and in the spirit of heritage-led urban design.

3.6.3.4 Theme 2 compatibility summary: Heritage conservation and compatibility

The analysis of heritage compatibility under Theme 2 demonstrates that the Gregory Place Affordable Housing Project achieves a high standard of integration with the Harris Park heritage precinct. The proposal has been rigorously evaluated against site-specific, statutory and strategic heritage criteria, including the objectives of the *Heritage Act 1977*, clause 5.10 of the *Parramatta Local Environmental Plan 2011*, and the principles articulated in planning principle case law.

Across all 18 analytical questions, the proposed development has shown clear alignment with established heritage conservation principles. It responds with sensitivity to the individual and collective significance of State and locally listed items including Elizabeth Farm, Hambledon Cottage, and Experiment Farm. Importantly, the design avoids silhouette or view dominance, maintains significant sightlines, respects curtilage and material character, and reflects a coherent visual language grounded in the area’s colonial and landscape heritage context^{114 116}.

The design response has been informed and refined through iterative review processes, including detailed input from GBA Heritage, DSCA, the HC, and Aboriginal stakeholders. This has ensured that the architectural form, setbacks, articulation, landscape integration and materiality are not only contextually appropriate, but contribute to reinforcing the precinct’s layered historical identity. Specific measures such as archaeological salvage and interpretation strategies, retention of key vegetation and heritage curtilage setbacks further demonstrate commitment to cultural stewardship¹¹⁸.

In this context, the proposed development is not an imposition upon the heritage values of Harris Park but a respectful and contextually responsive evolution of the urban fabric. The project successfully demonstrates that it can coexist with, and even support the interpretation of, nearby heritage items by maintaining their prominence, enabling view sharing, and adopting a finely tuned, non-replicative design approach.

Accordingly, it is concluded that the Gregory Place project achieves environmental heritage compatibility as required under division 5 of the Housing SEPP 2021 and the relevant local and State heritage frameworks, and should be supported on this basis.

3.6.3.5 Theme 3 analysis: Acoustic compatibility and residential amenity

3.6.3.5.1 Management of external noise sources

1. How effectively does the design manage acoustic impacts from external sources, including road traffic on Hassall Street, to achieve the residential noise amenity criteria outlined in EPA guidelines and local development controls?

The development effectively manages external noise sources, particularly road traffic on Hassall Street, through a combination of façade design, material selection, and layout planning. The acoustic report prepared by Rodney Stevens Acoustics identifies that *“traffic noise from Hassall Street is a significant consideration,”* and mitigation is achieved via high-performance glazing and solid wall construction to meet the noise intrusion criteria set by the NSW EPA and the Apartment Design Guide (ADG).¹²⁵

2. Does the acoustic design specifically address and mitigate noise impacts from periodic activities and special events at the Our Lady of Lebanon Co-Cathedral, ensuring internal residential amenity is maintained?

Noise from periodic events at the adjacent Our Lady of Lebanon Co-Cathedral is specifically addressed in the assessment. The report states that, while event noise can be intermittent, the proposed dwellings are configured to orient living areas away from the most exposed façades, and internal layout and acoustic separation (such as secondary glazing and double-layer walls) ensure that *“the internal LAeq levels within habitable rooms remain within the recommended 40 dBA threshold during peak event periods.”*¹²⁶

3. What specific façade treatments and building construction standards are proposed to ensure residential units meet relevant acoustic criteria for noise attenuation from external sources?

The building incorporates laminated and insulated glazing systems, minimum Rw + Ctr 35-rated windows to affected façades, acoustic door seals, and concrete floor slabs with ceiling insulation batts. These treatments are specifically nominated in Table 7.2 of the acoustic report and demonstrate compliance with EPA and NCC Class 2 building standards.¹²⁶

3.6.3.5.2 Acoustic transition and neighbourhood compatibility

4. How has the removal of industrial activity explicitly improved the acoustic environment and reduced overall noise impacts on surrounding residential and heritage-sensitive areas?

The removal of the prior industrial use yields a measurable acoustic benefit. As noted in Section 8 of the acoustic report, *“existing LAeq levels recorded at boundary positions A and C were consistently elevated due to mechanical and logistics operations from the former warehouse facility,”* and post-development modelling confirms *“a net reduction in ambient and peak-period noise levels”* across the site’s interface with Experiment Farm and Parkes Street.¹²⁶

¹²⁵ Appendix K – updated Acoustic Assessment - Rodney Stevens Acoustics, – SEAR 12 2024 Scheme, Revision 4, July 2025, Sections 7–9, Tables 7.2 & 8.1, and Appendix B.

5. Does the proposal include explicit measures ensuring new residential activities will not generate noise impacts incompatible with the existing quiet residential and heritage precinct?

Residential activities within the new development are inherently quieter and more compatible with the surrounding residential and heritage uses. The assessment notes that “*acoustic emissions from the development will be limited to occasional domestic noise, well below the intrusive noise criteria thresholds,*” and no communal outdoor spaces are located near sensitive boundaries.¹²⁶

6. Are the design and operational controls sufficient to demonstrate that the proposal will avoid or mitigate noise conflict with neighbouring community and religious activities?

The design incorporates clear operational limits for rooftop equipment, and acoustic fencing along boundaries is proposed where required to manage transition zones. A detailed noise management plan is proposed as a condition of consent, including protocols to address any complaints from nearby community or religious facilities, demonstrating a proactive compatibility framework.¹²⁶

3.6.3.5.3 Internal acoustic amenity

7. How effectively do internal acoustic treatments, such as wall construction, glazing design, and internal layouts, ensure high levels of acoustic comfort and privacy within residential apartments?

The internal acoustic strategy provides high levels of comfort through compartmentalised apartment planning, acoustic isolation between bedrooms and bathrooms, and double-glazed units facing noise sources. The report confirms that “*internal noise levels are predicted to achieve ≤ 35 dBA in bedrooms and ≤ 40 dBA in living spaces, in line with ADG objectives.*”¹²⁶

8. Are acoustic standards explicitly compliant with or exceed the requirements of the Apartment Design Guide and relevant Australian Standards, ensuring residential amenity outcomes suitable for contemporary living?

The proposal meets or exceeds the acoustic performance standards outlined in the ADG and the National Construction Code. Specifically, intertenancy walls achieve minimum R_w 50, and floors $R_w + C_{tr}$ 50, ensuring privacy and acoustic separation consistent with contemporary best practice.¹²⁶

9. What explicit internal design strategies have been adopted to ensure acoustic privacy between apartments, common areas, and residential amenities?

Internal layouts avoid stacking of high-noise functions across different units. Bathrooms are placed away from bedrooms of adjoining units, and service risers are acoustically treated. These design strategies are noted in Table 8.1 of the acoustic report as key contributors to achieving internal acoustic privacy.¹²⁶

3.6.3.5.4 Plant, equipment, and operational noise management

10. Has detailed acoustic analysis explicitly confirmed that noise generated by building services plant, ventilation, lifts, and operational equipment will meet relevant EPA and local authority acoustic criteria?

Detailed modelling of building services (lifts, HVAC, exhaust fans) confirms that operational noise emissions comply with the NSW EPA Noise Policy for Industry. L10 noise levels at sensitive receivers are expected to remain below 35 dBA at night and 45 dBA during the day.¹²⁶

11. Are plant and equipment locations and acoustic treatments clearly identified and justified through acoustic assessments, demonstrating minimal noise impact on neighbouring properties and heritage precincts?

Rooftop plant is set back from the perimeter and screened by acoustic enclosures. Air-conditioning condenser units are located on balconies with absorptive linings and baffled exhaust paths. These

treatments are described in Sections 9.2–9.4 and satisfy the EPA and Parramatta LEP operational requirements.¹²⁶

12. Does the acoustic assessment explicitly demonstrate compliance with the NSW EPA Noise Policy for Industry for all operational noise generated by the proposed development?

Yes, the acoustic assessment provides explicit confirmation of compliance with the EPA’s Noise Policy for Industry. Measurement locations, modelling assumptions, and predicted sound power levels are clearly identified in Appendix B of the report, confirming that all plant-related emissions fall within acceptable thresholds.¹²⁶

3.6.3.5.5 Acoustic benefit and long-term amenity

13. Does the acoustic assessment specifically identify measurable acoustic benefits gained by replacing the current industrial use with the proposed residential scheme?

The assessment concludes that “replacing the industrial function with a mid-rise residential format results in a 5–10 dBA reduction in site-emitted noise across all receiver points,” representing a substantial benefit to local acoustic amenity. This is particularly relevant for Experiment Farm and Parkes Street interfaces.²¹⁸

14. How explicitly has the acoustic assessment demonstrated long-term benefits in terms of noise reduction, improved environmental quality, and compatibility with the desired future residential character outlined in local strategic planning documents?

The long-term acoustic environment is significantly improved. The report states that “*ambient LAeq levels across the locality will stabilise within the 40–45 dBA range during both day and evening,*” aligning with strategic planning goals for residential and cultural heritage precincts.²¹⁸

15. Are acoustic mitigation measures, such as landscaping and strategic spatial planning, explicitly integrated into the proposal to enhance acoustic compatibility and amenity for future residents and surrounding communities?

Acoustic mitigation is integrated into the site layout and landscaping strategy. Dense vegetation buffers along the southern and eastern boundaries serve as natural acoustic screening, and deep soil zones help attenuate low-frequency noise. This co-benefit is acknowledged in both the acoustic and landscape reports.¹²⁶

3.6.3.6 Theme 4 analysis: Environmental performance and mitigation

3.6.3.6.1 Thermal performance and solar access

1. How does the proposal demonstrate effective passive design strategies to achieve thermal comfort and minimise reliance on mechanical heating and cooling?

The proposal demonstrates a robust application of passive design strategies that optimise thermal comfort and reduce dependence on mechanical systems. The orientation of the buildings maximises solar access to living areas and private open space, particularly during winter months, which is critical in achieving internal temperature regulation without mechanical intervention. The design incorporates deep balconies, fixed external shading, and operable louvres which are strategically positioned to modulate seasonal solar gain. The architectural plans confirm that the use of high-performance glazing and thermally insulated façades will significantly reduce heat gain in summer while maintaining warmth during cooler periods. Cross-ventilation principles are also employed in dual-aspect units, further supporting passive cooling.¹²⁶

2. Does the proposal meet or exceed the minimum solar access requirements for residential development in the Apartment Design Guide and Housing SEPP?

Yes, the development exceeds the minimum solar access requirements outlined in the Apartment Design Guide (ADG). The ADG stipulates that a minimum of 70% of apartments should receive at least 2 hours of direct sunlight between 9 am and 3 pm in mid-winter to living rooms and private open space. The solar access analysis confirms that 87% of units meet this criterion, as illustrated in the Solar Diagrams prepared for the updated SSDA scheme ¹¹³. Importantly, the remaining units that do not meet the threshold are located in areas where solar access is compromised by unavoidable external overshadowing beyond the site boundary, not due to internal site layout or design flaws.

3. What evidence supports the assessment that overshadowing impacts on neighbouring properties, including heritage gardens and public spaces, are acceptable and have been minimised through design refinement?

Overshadowing has been carefully modelled, and the resulting impacts have been demonstrably reduced through iterative design refinements. The visual impact study by Tzannes shows that shadow diagrams for 21 June indicate no additional overshadowing on Elizabeth Farm or its curtilage when compared to existing conditions. Additionally, overshadowing of Hambledon Cottage gardens has been minimised by the placement of lower-scale built forms and appropriate upper-level setbacks on the western interface ¹¹⁶. The analysis confirms that morning and midday sun access to heritage open spaces is retained in all scenarios modelled, validating that the overshadowing is within acceptable limits and does not compromise heritage or residential amenity. ¹²⁷

3.6.3.6.2 Energy performance and building efficiency

4. Does the proposed development achieve or exceed minimum energy efficiency benchmarks under the National Construction Code (NCC) and applicable BASIX standards?

The proposal demonstrates ability to achieve compliance with the energy efficiency requirements mandated by the Building Sustainability Index (BASIX) and includes targeted strategies to achieve NABERS Energy equivalency benchmarks for common areas. The submitted reports confirm that all dwellings meet or exceed the required thermal comfort, energy and water efficiency targets, with commitments to high-performance glazing, LED lighting, ceiling insulation, and water-efficient fixtures. In addition, the communal areas of the building are designed to meet or exceed NABERS 5-Star equivalency performance through measures including centralised hot water systems, energy-efficient lifts, and photovoltaic solar panels on the roof of each building. ¹¹³ These strategies collectively support the environmental performance of the project and reduce operational greenhouse gas emissions in accordance with both State policy and industry best practice.

5. What design features are incorporated to reduce urban heat island effect, improve microclimate, and support passive cooling across the site?

The design incorporates a number of features that directly address the urban heat island (UHI) effect and improve the site's microclimate. A key initiative is the significant proportion of deep soil planting across the site and a tree canopy coverage exceeding 25% of the total area. The landscape plan provides a mix of native shade trees, cool paving materials, and soft landscaping which mitigate ambient heat buildup and increase evapotranspiration. The use of highly reflective roofing materials and light-toned building finishes further reduces heat absorption. Importantly, the building arrangement allows for breezeways and voids between built elements, enabling air movement and passive cooling to permeate the site. These strategies, integrated into the site planning, reduce local temperatures and contribute to climate resilience. ¹¹³

6. Does the environmental performance strategy contribute to broader sustainability objectives, such as reduced operational emissions, embodied energy efficiency, or climate resilience?

Yes. The proposal contributes significantly to broader sustainability objectives, including reduced operational emissions and improved climate resilience. The adoption of passive design, high-performance envelope materials, and energy-efficient services contributes to a substantial reduction in operational energy demand. Embodied energy is addressed through the proposed use of locally sourced, low-carbon construction materials such as recycled concrete and steel where feasible, and the design encourages modular and demountable components to minimise construction waste. Additionally, the integration of green infrastructure—such as rain gardens and permeable paving—supports stormwater retention, reduces flood risk, and contributes to site cooling, aligning with contemporary urban climate resilience goals.

3.6.3.6.3 Water efficiency and stormwater management

7. How does the proposal achieve high standards of water efficiency in both residential use and communal areas?

The proposal adopts a suite of measures to ensure water efficiency across both individual dwellings and shared spaces. All apartments will be fitted with WELS 4-star rated taps and shower heads, dual-flush toilets, and water-efficient appliances as documented in the BASIX certificate commitments. In communal areas, landscape irrigation systems are designed to use smart controllers with moisture sensors and rain shut-off technology. In addition, water meters will be installed to monitor both individual and communal consumption patterns, supporting water conservation awareness among residents and enabling adaptive management by building operators¹²⁸. These features exceed the minimum regulatory requirements and contribute to long-term sustainability goals.

8. What stormwater management strategies are in place to ensure compliance with water-sensitive urban design principles?

The stormwater strategy aligns with best practice WSUD principles through the inclusion of permeable paving, bioretention swales, and rain gardens designed to filter and detain runoff before discharge to the municipal system. The integrated civil and landscape design ensures that runoff is slowed, captured, and treated on-site, significantly reducing pollutant loads entering the downstream environment. Roof runoff is collected in on-site detention (OSD) tanks that attenuate peak flows, and excess clean water is diverted for landscape irrigation, further supporting site water cycle management. The approach is both technically robust and contextually responsive to the local hydrological conditions of the Harris Park precinct.

9. Is the stormwater management approach designed to avoid adverse impacts on heritage landscapes, adjacent sites, and the local hydrology?

Yes. The stormwater system has been specifically designed to avoid any adverse impacts on neighbouring properties and heritage landscapes, including the Elizabeth Farm and Hambledon Cottage curtilages.¹²⁶ The system avoids directing concentrated flow toward any shared boundary and uses level spreaders and vegetated buffers along edges to reduce runoff velocity. These features minimise the risk of erosion and ensure the retention of heritage garden soil conditions. Furthermore, the bioretention systems are sited away from sensitive archaeological areas, as confirmed by the Heritage Impact Assessment and Archaeological Management Plan, to prevent ground disturbance and maintain the integrity of subsurface heritage elements.¹²⁹

¹²⁸ Environmental Design Statement, July 2025

¹²⁹ Appendix T - Historical Archaeological Heritage Impact Assessment, June 2025

3.6.3.6.4 Waste and resource management

10. How has the design facilitated effective on-site waste management and minimised visual or amenity impacts associated with waste storage and collection?

The development incorporates a centralised and concealed waste management system that complies with the Better Practice Guide for Waste Management in Multi-unit Dwellings and council guidelines.¹³⁰ Waste storage rooms are integrated at basement level to avoid surface-level visibility, and all collection and access routes are enclosed and acoustically treated to minimise odour, noise, and operational disturbance.¹²⁶ Separate rooms are provided for general waste, recycling, and organic waste, with sufficient space for bulk item storage. The location and layout of the waste rooms ensure safe and unobstructed access for both residents and waste contractors, facilitating efficient collection without impacting residential amenity or street character.¹³¹

11. What provisions are in place to support recycling and organic waste separation in alignment with local and State policy targets?

The development includes dedicated facilities for source separation of recyclables and organic waste in accordance with the NSW Waste and Sustainable Materials Strategy 2041.¹³² Colour-coded bins and signage will be installed in all waste rooms to guide proper use. At the unit level, the design allows sufficient kitchen storage for tri-bin systems, enabling residents to separate waste at the point of generation¹³². Educational materials and resident waste management guides will be issued by the building manager as part of the occupation strategy. The combined strategy is designed to meet or exceed waste diversion targets set by the EPA and Parramatta.

12. Has construction waste minimisation been addressed through the adoption of resource-efficient building practices?

Yes. The project team has committed to implementing a Waste Management Plan (WMP) in accordance with the Waste Reduction and Purchasing Policy (WRAPP) and AS/NZS 3831:1998 – Waste Management.¹³² The WMP outlines procedures to prioritise re-use of on-site materials, segregate recyclable construction waste (e.g. steel, concrete, timber), and minimise off-site disposal. Where possible, modular components and prefabrication are proposed to reduce on-site waste generation. Construction contractors will be required to report on waste volumes and recycling rates at each stage of the build. This approach reduces landfill dependency and supports the project's broader sustainability objectives.

3.6.3.6.5 Material selection and embodied energy

13. Are materials selected on the basis of low embodied energy, durability, and recyclability, with reference to lifecycle performance and maintenance efficiency?

Yes. The materials specified for the development are guided by environmental impact minimisation across the lifecycle, including embodied energy and maintenance efficiency. The architectural documentation nominates products such as recycled concrete, low-carbon cement, and sustainably sourced timber, selected for their reduced lifecycle impact and low embodied energy profile.¹¹³ Material palettes are developed in accordance with durability and low-maintenance goals to minimise future replacement. The cladding systems, for example, include powder-coated aluminium with high solar reflectance values and extended durability, reducing the need for ongoing maintenance or repainting. These decisions align with the objectives of Green Star and Life Cycle Assessment (LCA) frameworks, supporting both environmental responsibility and cost-efficiency.

¹³⁰ City of Parramatta Waste Management Guidelines (2022) and NSW EPA Better Practice Guide (2021)

¹³¹ Appendix J – Demolition/Construction and Operational Waste Management Plan, July 2025

¹³² NSW Government, Waste and Sustainable Materials Strategy 2041: Stage 1, DPE, 2021

14. How does the proposal demonstrate a reduction in construction-related environmental impacts through prefabrication, modularity, or reduced transport and logistics requirements?

The proposal includes significant elements of prefabricated and modular construction, particularly for façade panels, balcony assemblies, and bathroom pods, which are manufactured off-site and transported for installation.¹³³ This approach reduces material waste, improves construction timeframes, and minimises on-site disturbance and emissions associated with heavy vehicle movement and logistics. Construction traffic impacts are further reduced through scheduling efficiencies and local procurement of bulk materials. Together, these strategies reduce the carbon footprint of the construction phase and align with the principles of circular construction as promoted in the NSW Net Zero Plan and the Green Building Council’s guidelines on modern construction practices.

15. Is there a clear material strategy or sustainability report identifying how the development will reduce resource consumption over the lifecycle of the project?

Yes. The Environmental Design Statement appended to the design report outlines a clear and comprehensive sustainability strategy, including a section dedicated to materials and lifecycle performance.¹¹³ It includes resource efficiency benchmarks, goals for minimising lifecycle carbon impacts, and commitments to use materials with published Environmental Product Declarations (EPDs). Material choices are linked to whole-of-life assessment methods, with an emphasis on minimising future replacement, avoiding non-recyclable composites, and designing for disassembly and reuse¹¹³. The strategy confirms the developer’s intent to integrate sustainability into procurement, installation, and long-term operational maintenance of the project.

16. How has the development explicitly addressed climate risk—such as extreme heat, storm events, or energy instability—through site planning, building performance and environmental design?

The development addresses multiple dimensions of climate risk through integrated environmental design strategies. To counter extreme heat, the project incorporates tree canopy coverage exceeding 25% of the site, deep soil zones for passive cooling, reflective roofing, and extensive shaded communal areas.¹¹³ ¹³⁴For storm resilience, the stormwater system includes on-site detention, bioretention basins, and WSUD-compatible drainage that manages peak flows and reduces flood risk. Emergency egress pathways and critical infrastructure (e.g. electrical supply, lift access) are elevated or protected against potential stormwater inundation, ensuring continuity during adverse weather. In terms of energy instability, the proposal includes rooftop solar arrays with battery-ready switchboards to facilitate future energy resilience measures.¹³⁵ These responses are consistent with climate resilience principles promoted by Resilient Sydney and the NSW Climate Change Policy Framework.¹³⁶

17. Does the design incorporate thermal comfort strategies that reduce reliance on mechanical cooling and improve resilience during heatwaves?

Yes. The design incorporates a robust suite of thermal comfort strategies targeting heatwave resilience and passive cooling. Cross-ventilation is enabled in over 70% of apartments via dual-aspect layouts and openable windows. Building orientation maximises winter sun and reduces summer heat gain, complemented by adjustable louvres and operable shading. High thermal mass materials in floor slabs buffer internal temperatures against external extremes. External communal areas are shaded by large canopy trees and pergolas, enabling cooler outdoor experiences during high-temperature events.¹¹³ These strategies reduce dependency on air conditioning systems and contribute to energy savings and public health resilience.

¹³³ Appendix Z - Construction Management Plan, July 2025

¹³⁴ Appendix I – Ecological Sustainable Design Report

¹³⁵ Appendix EE -Infrastructure Delivery, Management & Staging Plan

¹³⁶ City of Parramatta Local Strategic Planning Statement, 2020; NSW Housing 2041 Strategy; Net Zero Emissions Plan Stage 1: 2020–2030.

18. Are outdoor spaces and communal areas designed to offer cooling, shade, and comfort during high-temperature events, supporting both health and liveability outcomes?

Yes. Outdoor and communal areas are specifically designed with microclimatic performance in mind. Shaded gathering spaces, pergolas, and green roofs support thermal comfort in open areas. The communal courtyard incorporates water-sensitive landscaping, shade trees, and seating zones shielded from direct sun.¹¹³ Additionally, the inclusion of cool paving materials and evaporative planting selections (e.g. low-water-demand natives) enhances the thermal performance of shared spaces. These elements promote occupant health, especially during heatwaves, while also improving urban habitat quality and social engagement opportunities.

3.6.3.6.6 Alignment with strategic sustainability goals

19. How does the project demonstrate that affordable housing can be delivered in a manner that exceeds minimum environmental standards and promotes intergenerational equity?

The project provides a clear demonstration that affordable housing can be delivered in a way that not only meets, but significantly exceeds minimum environmental performance standards, while aligning with broader objectives of intergenerational equity. The Gregory Place proposal commits to achieving BASIX targets that surpass compliance thresholds for energy, water, and thermal comfort performance across all dwellings, regardless of tenure or subsidy status. The application of durable, low-maintenance, and resource-efficient materials—such as thermally broken glazing, solar-reflective coatings, and long-life cladding—ensures longevity and reduces lifecycle costs, directly benefiting lower-income residents through reduced utility bills and lower maintenance liabilities over time.

Importantly, the inclusion of deep soil zones, communal gardens, passive recreational spaces, and low-emissions design features ensures environmental amenity and access to green infrastructure is shared equitably across all resident groups. These features reflect a commitment to high-quality, environmentally sustainable housing that does not compromise on comfort, dignity, or access for future generations.

This approach aligns with the strategic directions of the Parramatta Local Strategic Planning Statement (LSPS), which calls for "*inclusive, climate-resilient housing typologies that support environmental sustainability and equitable growth*" and with the State Government's objectives under the Net Zero Emissions Plan and Housing 2041.¹³⁷ Through this project, environmental quality and affordability are treated as complementary, not competing, objectives—establishing a precedent for high-performance affordable housing that supports economic participation, social inclusion, and ecological responsibility.

3.6.3.7 Theme 4 compatibility summary: Landscape integration and environmental performance

The Gregory Place proposal demonstrates strong environmental compatibility in landscape integration and environmental performance when assessed against the relevant statutory objectives, legal planning principles, and site-specific merit considerations. The design achieves measurable alignment with the EP&A Act, particularly the objective to promote the principles of ecologically sustainable development (ESD) as required under section 1.3. It also reflects the policy intent of the Housing SEPP 2021, which seeks to enable well-designed, sustainable residential environments that respond to local character and environmental constraints.

From a legal perspective, the project satisfies the compatibility test articulated in *Project Venture Developments Pty Ltd v Pittwater Council [2005] NSWLEC 191*, in which Senior Commissioner Roseth established that compatibility does not require sameness, but rather a capacity to co-exist in harmony

¹³⁷ City of Parramatta Local Strategic Planning Statement, 2020; NSW Housing 2041 Strategy; Net Zero Emissions Plan Stage 1: 2020–2030.

with the existing and desired future character of the area. Here, the landscape proposal demonstrably supports compatibility by replacing impermeable, industrial hardstand with a layered, functional landscape system that is visually and ecologically coherent with its heritage and natural surrounds. It facilitates a respectful interface with adjacent heritage items—particularly Elizabeth Farm, Hambledon Cottage, and Experiment Farm—through considered spatial arrangement, planting selection, and the reinforcement of historical landscape character.

In merit terms, the development transforms a degraded and environmentally disconnected site into a landscape-led precinct that reinstates ecological processes and enhances urban amenity. The landscape strategy integrates deep soil zones, native and endemic plantings, and tree canopy coverage exceeding 25%, contributing to urban heat mitigation, stormwater infiltration, habitat restoration, and public comfort. These interventions are supported by technical evidence including the Landscape Architectural Plans, the Arboricultural Assessment, and the Environmental Design Statement, all of which confirm that the proposed open space and green infrastructure exceed regulatory and best-practice benchmarks for infill development in a sensitive setting.

Importantly, the proposal integrates cultural landscape values, drawing on both Aboriginal cultural heritage and colonial-era landscaping traditions. Interpretive elements, plantings, and spatial relationships reflect the deep historical and cultural associations of the site, ensuring continuity and awareness of place identity. Landscape interventions are sensitively designed to avoid adverse impacts on heritage curtilage and archaeological potential, as confirmed in the Aboriginal and historical heritage assessments.

The proposal therefore satisfies statutory, legal, and merit-based tests of environmental compatibility in relation to landscape. It supports the objectives of sustainable development, achieves visual and ecological integration with its surroundings, and demonstrates a sophisticated and respectful approach to cultural and historical landscape values. Through this, the Gregory Place project advances a landscape-led model of urban repair that is environmentally robust, culturally sensitive, and strategically aligned.

3.6.3.8 Theme 5 analysis: Sustainability, resource efficiency and climate resilience

3.6.3.8.1 Energy performance and building efficiency

1. Does the proposed development achieve or exceed minimum energy efficiency benchmarks under the National Construction Code (NCC) and applicable BASIX standards?

Yes. The proposed development exceeds the minimum energy performance benchmarks of the NCC and BASIX. It achieves a 7-Star average NatHERS rating across all apartments and incorporates fully electric infrastructure from the outset (excluding fire services).¹¹³ Photovoltaic arrays equivalent to 271 kW capacity are integrated into rooftops, offsetting over 385 MWh annually—translating to an estimated 451,830 kg of CO₂ reduction per year.¹³⁵ These measures, coupled with air-source heat pumps and electric-boosted solar hot water systems, position the development for high operational efficiency from day one.

2. How explicitly does the architectural design maximise passive solar gain and thermal performance through appropriate building orientation, window placement, shading, and material selection?

The design optimises solar gain and thermal comfort through careful building orientation, generous window-to-wall ratios, and external passive shading. Deep eaves, adjustable louvres, and operable windows support both summer shading and winter heat gain. The façades use a high-performance thermal envelope to moderate internal temperatures and reduce mechanical conditioning needs. The

use of high solar reflectance materials (SRI-compliant) on roofs and podium surfaces further reduces heat absorption and contributes to indoor comfort.

3. Are energy-efficient systems (e.g. high-performance glazing, LED lighting, efficient HVAC systems) clearly integrated into the building design to reduce operational energy demand?

Yes. The buildings integrate LED lighting, efficient HVAC systems, ceiling fans, thermally broken high-performance glazing, and centralised hot water systems.¹³⁵ All appliances and equipment are electric, supporting streamlined maintenance and compatibility with future renewable energy networks. These initiatives are complemented by bulk-metered embedded networks to support cost-effective utility provision and energy monitoring across all dwellings and common areas.

4. How does the development facilitate renewable energy generation or future retrofit potential (e.g. solar PV capacity, centralised systems) as part of a long-term energy strategy?

The project incorporates a rooftop photovoltaic system designed for long-term scalability and management by an embedded network operator. Switchboards are battery-ready, and rooftop infrastructure includes space allocation and wiring to support future battery storage and EV integration. In commercial areas, the potential for mixed-mode ventilation is preserved, and future upgrades are supported by the centralised plant room configuration.

3.6.3.8.2 Water efficiency and stormwater management

5. What specific water-saving fixtures, fittings, and irrigation strategies have been adopted to reduce potable water use in accordance with BASIX water targets and WSUD principles?

All dwellings incorporate high-efficiency WELS-rated fixtures—4-star taps, toilets, and showerheads—aligned with BASIX water benchmarks. Landscape irrigation uses smart sensor systems and reuses captured stormwater and fire test water via onsite tanks. These features significantly reduce potable water demand across both private and shared domains.¹³⁵

6. Are rainwater capture, reuse, and retention systems clearly incorporated into the design for irrigation, toilet flushing or other non-potable uses?

Yes. Rainwater tanks are integrated across the site, with recycled water used for landscape irrigation and, where feasible, toilet flushing.¹³⁸ The system is connected to smart controllers and moisture sensors, ensuring minimal waste and efficient reuse of alternative water sources.

7. How explicitly does the development minimise stormwater runoff and support local water cycle management, consistent with Parramatta’s strategic water objectives?

The stormwater strategy includes permeable surfaces, bioretention swales, and rain gardens designed for pollutant filtration and detention.¹³⁹ Runoff is slowed and treated onsite before discharge, and onsite detention systems modulate peak flows to prevent erosion. This aligns with WSUD principles and contributes to local ecological stability.

3.6.3.8.3 Material selection and embodied energy

8. Are materials selected on the basis of low embodied energy, durability, and recyclability, with reference to lifecycle performance and maintenance efficiency?

Yes. The design specifies materials with Environmental Product Declarations (EPDs), including low-carbon concrete (≥40% cement replacement), recycled steel, and sustainably sourced timber. External finishes include solar-reflective, durable aluminium cladding that supports both low-maintenance and high-thermal-performance outcomes.

¹³⁸ Appendix DD – Hydraulic Services Plans and WSUD Summary Memo, July 2025

9. How does the proposal demonstrate a reduction in construction-related environmental impacts through prefabrication, modularity, or reduced transport and logistics requirements?

Prefabricated bathroom pods, balcony modules, and façade systems are employed to reduce construction waste, emissions, and noise.¹³⁴ These are produced offsite and installed with minimal disturbance. Transport emissions are reduced by sourcing bulk materials locally, and the modular approach also compresses the construction program, reducing peak on-site activity durations.

10. Is there a clear material strategy or sustainability report identifying how the development will reduce resource consumption over the lifecycle of the project?

Yes. The Environmental Design Statement includes a lifecycle analysis identifying reduction targets for embodied emissions, durability benchmarks, and circular economy principles.¹³² Procurement is guided by a preference for recyclable and demountable materials to reduce long-term maintenance costs and replacement cycles.

3.6.3.8.4 Waste minimisation and circular economy

11. What design features are in place to facilitate waste separation, collection and recycling during both construction and occupation phases?

Separate waste rooms are provided for general waste, recyclables, organics, and bulky items at the basement level, enclosed and acoustically treated. A tri-bin system is integrated into every dwelling.¹³²
¹³⁹Contractors must adhere to a WRAPP-compliant Construction Waste Management Plan, with mandatory reporting of recycling rates and landfill diversion metrics.

12. Are construction waste targets, reuse strategies, and operational waste management plans clearly articulated in a way that supports the principles of the circular economy?

Yes. The Waste Management Plan targets a 90% landfill diversion rate during construction. Modular construction reduces offcuts and promotes reuse, while fit out elements are designed for disassembly.¹³² This strategy supports circular economy principles and minimises future deconstruction waste liabilities.

13. How does the development promote end-of-life adaptability or reuse of construction elements, thereby reducing future waste liabilities?

The design supports long-term adaptability by using modular components, removable façades, and flexible internal layouts. Bathrooms and kitchens are positioned to facilitate future service upgrades without structural disruption. The material selection avoids composite products that cannot be recycled or dismantled.¹¹³

3.6.3.8.5 Climate change adaptation and resilience

14. How has the development explicitly addressed climate risk—such as extreme heat, storm events, or energy instability—through site planning, building performance and environmental design?

The proposal is highly responsive to climate risks. High-reflectivity roofing and cool paving reduce urban heat. Landscaping includes deep soil zones and native shade trees exceeding 25% canopy coverage. Storm resilience is ensured through on-site detention, overflow paths, and waterproofing standards for plant and basement areas. Rooftop solar PV, ceiling fans, and battery-ready infrastructure prepare the development for future energy supply disruptions.¹³⁶

15. Does the design incorporate thermal comfort strategies that reduce reliance on mechanical cooling and improve resilience during heatwaves?

¹³⁹ Waste Management Plan and Better Practice Guide Compliance Table, July 2025; WRAPP Policy and AS/NZS 3831:1998 references, July 2025

Yes. 70% of apartments have cross-ventilation, shading elements, ceiling fans, and high-performance thermal envelopes reduce internal heat gain. Most apartments achieve dual aspect, and building orientation maximises passive comfort. The use of operable shading and high thermal mass materials further enhances heatwave resilience.¹¹³

16. Are outdoor spaces and communal areas designed to offer cooling, shade, and comfort during high-temperature events, supporting both health and liveability outcomes?

Yes. Outdoor communal areas feature large canopy trees, cool paving materials, water-sensitive planting, shaded seating, and pergolas. These contribute to microclimatic comfort and reduce thermal stress for residents. Courtyards are designed with shaded, well-ventilated paths and include accessible respite areas. The communal spine integrates evaporative planting and stormwater-sensitive landscaping, increasing comfort and biodiversity.⁴²

3.6.3.9 Theme 5 compatibility summary: Environmental sustainability, resource efficiency and building performance

The Gregory Place project achieves a high level of environmental compatibility in relation to building performance, sustainability, and resource efficiency. It demonstrates full alignment with the statutory objectives of the EP&A Act, particularly the promotion of ecologically sustainable development (ESD), and gives effect to the performance expectations of the Housing SEPP, which requires that new residential development actively reduces environmental impact and promotes sustainable living.

From a legal compatibility perspective, the proposal is consistent with the planning principle articulated in *Project Venture Developments Pty Ltd v Pittwater Council [2005] NSWLEC 191*, which confirms that compatibility should be assessed in terms of capacity to operate harmoniously within the existing and evolving environment. The Gregory Place scheme replaces a high-impact industrial use with a highly efficient residential format that is explicitly tailored to support long-term sustainability. The new development coexists with its urban and heritage context without imposing excessive environmental loads, and in fact delivers measurable improvements in environmental performance, resource efficiency and lifecycle outcomes.

On the basis of merit-based assessment, the project demonstrates significant environmental advancement across key building performance metrics. Passive solar design is evident in building orientation, shading, cross-ventilation and thermal mass strategies. All dwellings meet or exceed BASIX energy and water targets, and the scheme includes centralised energy-efficient building services, solar-ready infrastructure, low-embodied energy material selections, and comprehensive stormwater reuse systems. These outcomes are documented in the, Environmental Design Statement, and Electrical and Energy Strategy Plans, all of which demonstrate that both regulatory compliance and sustainability leadership are achieved.

Importantly, these sustainability measures are equitably applied across all tenures, including affordable and social housing units. This ensures that environmental benefit is not exclusive but inclusive, delivering intergenerational equity and reducing the utility cost burden for lower-income households. This directly responds to the policy intent of the NSW *Housing 2041 Strategy and Net Zero Emissions Plan*, both of which emphasise high-performance housing as essential to economic participation and long-term liveability.

The design also addresses future risks, incorporating strategies for climate change adaptation, energy instability, and extreme weather events. Shaded communal areas, water-efficient landscaping, and high-performance glazing ensure thermal comfort and energy savings during heatwaves. Infrastructure layouts are future-proofed for solar generation, battery storage, and EV charging.

In conclusion, the Gregory Place proposal meets and exceeds the statutory, legal, and merit-based tests for environmental compatibility under Theme 5. It is not only a compliant development but a leadership example of how affordable housing can—and must—be delivered with environmental integrity, technical sophistication, and long-term resilience.

3.6.3.10 Theme 6 analysis: Interface management and transitional integration

3.6.3.10.1 Visual and built form transitions

- 1. How does the proposed building form and massing establish a clear and legible visual transition from the low-scale heritage precinct to the east toward the denser urban structure to the west?**

The design response provides a calibrated transition in built form that steps down in scale and intensity towards the eastern interface, which includes Elizabeth Farm and other heritage sites. Height is concentrated at the western edge of the site, adjacent to the future urban growth front of Parramatta CBD, while the eastern buildings are reduced in scale and sensitively articulated with horizontal breaks, recessive top floors, and integrated landscape edges. The visual impact study and urban design report confirm that this built form sequence effectively mediates between heritage sensitivity and urban consolidation.¹⁰⁶

- 2. Are height transitions clearly stepped, modulated, or otherwise articulated to avoid abrupt changes in scale at key interfaces (e.g. with heritage buildings, the Cathedral, and low-rise neighbours)?**

Yes. The building envelopes are explicitly modulated to step down at key heritage interfaces, particularly to the east (Elizabeth Farm) and south-east (Hambledon Cottage). The interface with the Co-Cathedral is managed through increased setbacks, façade articulation and vegetated buffers. Architectural elevation drawings and the Visual Impact analysis confirm that these transitional strategies avoid jarring visual contrasts and ensure a respectful relationship across multiple contexts.¹⁰⁶

[The retention and reinforcement of tree canopy along the eastern boundary forms a natural visual buffer between the proposed development and Experiment Farm, preserving the spatial and perceptual separation of built form from the colonial-era homestead. As demonstrated Figure 15, filtered views from the elevated platform at Experiment Farm maintain their historic tree-dominated horizon, with the proposed development sitting visually recessed behind mature vegetation. This outcome aligns with the view management intent of Historic View Corridor 7 under the Parramatta DCP and confirms that the proposal does not result in visual encroachment or silhouette intrusion when viewed from the heritage item]^{106 114}.



Figure 15 Existing view from Experiment Farm northeast to the trees of Hambledon Cottage

3. Does the built form composition contribute to an orderly and respectful streetscape rhythm, consistent with surrounding development and strategic planning objectives?

The streetscape along Gregory Place and Hassall Street is reinforced through building rhythm, consistent entry sequencing, and setbacks that align with the established grain of the precinct. The proposal integrates small-scale modulations and generous ground-level setbacks that support pedestrian experience while avoiding monolithic built edges. The design report demonstrates how this orderliness contributes to a legible urban form aligned with the Parramatta LSPS.¹¹³

3.6.3.10.2 Use compatibility and functional adjacency

4. How does the proposed residential use interface with community and religious uses, particularly the Co-Cathedral, in a way that supports mutual amenity and avoids functional conflict?

The development positions active uses and community-facing interfaces away from the Cathedral's primary activity zones, reducing potential for acoustic or operational conflict. Residential entry points and communal spaces are located strategically to avoid direct adjacency to areas of high footfall or late-night activity from the Cathedral precinct. Landscape screening and acoustic treatments provide a further buffer.¹²⁶

5. Has a detailed analysis been undertaken to ensure that the new residential use will not result in land use conflict, overshadowing, or other functional impacts on adjacent sites?

Yes. The overshadowing diagrams confirm that the Co-Cathedral and its immediate open space retain access to winter sunlight. Traffic and access studies confirm that resident vehicle movement will not conflict with worship times. The change of use from industrial to residential significantly reduces historical impact, particularly noise and truck traffic, resolving previous land use tensions.

6. Is the removal of industrial activity demonstrably improving the quality and compatibility of land use across the precinct, and does it align with Council's LSPS vision for the site?

Absolutely. The LSPS identifies the site for transition to higher-density residential use that integrates with its cultural and environmental setting. The proposal removes industrial uses with known incompatibilities—including noise, emissions, and impermeable surfaces—and replaces them with a development that restores site permeability, reduces environmental load, and supports housing choice.

¹²⁶

3.6.3.10.3 Public domain and edge activation

7. How has the proposal been designed to ensure active, safe, and attractive edges along Gregory Place and Hassall Street?

The proposal delivers continuous street-level activation through entries, balconies, pedestrian sightlines, and landscaped forecourts. Entrances are clearly marked and frequent, encouraging permeability and social engagement. Lighting, passive surveillance and wayfinding design all contribute to safety and amenity. ¹²⁶

8. Are entrances, openings, landscape elements, and frontage treatments used effectively to activate interfaces, promote pedestrian movement, and support public domain amenity?

Yes. The design report outlines how landscaped setbacks and entry sequences along both frontages provide high-quality public realm interface. The forecourt on Gregory Place is designed as a semi-public shared space, reinforcing social connectivity, legibility, and pedestrian comfort. ¹¹³

9. Does the interface with the street respect the fine-grain pedestrian character of the precinct, and does it avoid long blank walls or inactive frontages?

There are no blank walls along any street frontage. Façades are varied, articulated, and detailed with material changes, planting and fenestration to maintain interest and human scale. At-grade apartments feature private terraces behind low planters or fences, ensuring visual interaction without compromising privacy. ¹¹³

3.6.3.10.4 Acoustic and privacy interfaces

10. How are potential acoustic conflicts with neighbouring land uses managed—particularly with respect to worship events, community gatherings, and early morning or late-night activity?

The acoustic strategy includes double-glazed windows, acoustic fencing at sensitive boundaries, and operable louvres to control internal sound ingress. Apartments adjacent to the Cathedral are planned with sleeping areas positioned away from potential noise sources. ^{126 111}

11. Do setbacks, screening devices, and internal layouts protect the acoustic and visual privacy of both new residents and adjoining land users?

Yes. Setbacks on all sides exceed DCP minimums. Landscape buffers, screening fences, and carefully arranged window placements all ensure mutual privacy. Shared outdoor spaces are positioned centrally or toward low-sensitivity boundaries, away from heritage or private interfaces. ¹¹³

12. Are communal and private open spaces located and treated in a way that avoids overlooking or other amenity intrusions across sensitive interfaces?

The design places private open space within courtyards and terraces that are inward-looking or elevated. There is no direct overlooking of heritage gardens or neighbouring dwellings. Landscape treatments, balustrades, and tiered planting add further visual protection. ¹¹³

3.6.3.10.5 Landscape and environmental buffering

13. How does the landscape design reinforce interface management, including the use of planting, fencing, topography, and ground treatments to soften transitions and provide buffers?

The planting palette includes endemic species and canopy trees selected to soften built form transitions. Topographical shaping and terraced landscape zones buffer built edges and enhance soil permeability. The design report confirms the use of this landscaping to restore ecological rhythm and visual harmony.

14. Are existing trees and vegetation used strategically to support interface resolution and continuity with the surrounding natural and cultural landscape?

Existing trees, particularly on the south-eastern boundary, are retained where possible and incorporated into the public domain interface design. These trees provide visual continuity and habitat linkage to adjacent heritage sites.⁴²

15. Does the proposal contribute positively to the perceived environmental quality of interface zones through generous landscaping and sustainable design?

Yes. The landscape design strengthens environmental character and amenity through shaded walkways, planted buffers, and communal garden areas. Sustainable elements—including permeable paving, native species, and passive cooling—enhance comfort and support contextual transition.⁴²

3.6.3.10.6 Cultural and heritage sensitivity at edges

16. Has the proposal demonstrated a sensitive response to cultural and heritage curtilage along its eastern and southern boundaries?

The proposal respects and reinforces the heritage curtilage of Elizabeth Farm and Hambledon Cottage by reducing building height, increasing landscape buffers, and incorporating interpretive design elements. View corridors are preserved and complemented by subtle landscape transitions.^{43 109}

17. Are the spatial and visual connections between heritage elements and the broader precinct respected through interface articulation and urban design strategies?

Yes. Built form and open space are arranged to preserve axial and diagonal view corridors from the public domain into heritage gardens. The modulation of setbacks and planting gradients supports spatial memory and strengthens cultural identity.¹¹⁴

18. How does the interface treatment support community understanding of the site's heritage, cultural significance, and contextual role in the evolution of the precinct?

Interpretive elements—such as signage, material selection, and site orientation—have been embedded into the public domain to articulate the site's layered history, including Aboriginal and colonial narratives. These gestures ensure that the interface contributes to the ongoing public understanding of the precinct's significance.¹¹¹

3.6.3.11 Theme 6 compatibility summary: Interface management and transitional integration

The Gregory Place proposal demonstrates a high level of environmental compatibility with respect to its transitional interfaces, resolving the complex spatial, functional, and visual relationships between heritage precincts, residential neighbours, community infrastructure, and the evolving urban form of Parramatta's eastern fringe. The site operates at a threshold condition—transitioning between low-scale heritage fabric to the east, high-density CBD development to the west, and a significant community node at the Our Lady of Lebanon Co-Cathedral to the south. The design successfully mediates these contrasts through considered built form modulation, acoustic and privacy treatments, landscape buffering, and visual integration.

From a statutory perspective, the proposal aligns with the objectives of the EP&A Act, including ecologically sustainable development and orderly urban transition. It complies with the interface and transition principles articulated in the Housing SEPP 2021 and responds to key urban design considerations in the *Apartment Design Guide*, particularly Part 4 – Building Design. The principles of visual transition and curtilage protection established in *Project Venture Developments v Pittwater Council* [2005] NSWLEC 191 continue to underpin the design logic, ensuring that abrupt changes in scale and use are avoided.

From a legal standpoint, the proposal demonstrates compatibility in accordance with clause 39(2)(b) of the Housing SEPP, which requires evidence that the development is “compatible with the character of

the local area”. The building’s height transitions, functional adjacency strategies, and interface treatments directly address this test, particularly where the development interfaces with State Heritage Register-listed properties and a prominent place of worship. Moreover, the landscape design, noise controls, and spatial sequencing strategies reinforce visual and acoustic compatibility—ensuring the legal test for land use coexistence is satisfied and defensible.

On a merit basis, the interface response is exemplary. Built form transitions are carefully calibrated, including reduced building heights and increased setbacks along heritage and low-scale interfaces. Public realm interfaces are activated through entrances, planting, and pedestrian connections, while visual bulk is broken down through façade articulation and massing control. Importantly, the design avoids the repetition of long blank walls or overshadowing impacts, and instead creates a refined visual rhythm that supports the emerging character while reinforcing the historic grain of the precinct. Strategic placement of communal spaces, deep soil zones, and passive surveillance opportunities ensures that the edge conditions of the site are not only compatible but enhance neighbourhood amenity.

In sum, the Gregory Place development establishes a transitional edge condition that is respectful, functional, and contextually calibrated. It avoids visual conflict, mitigates acoustic and operational impacts, and supports a harmonious integration of residential use within a layered and sensitive setting. The interface management strategy upholds all relevant compatibility benchmarks under law, policy, and best practice design.

3.6.3.12 Theme 7: Green infrastructure systems and ecological integration

3.6.3.12.1 Water management and ecological integration

1. Does the stormwater system incorporate water-sensitive urban design principles, including on-site retention, filtration, detention and infiltration, to improve water quality and reduce urban runoff?

Yes. The Gregory Place redevelopment demonstrates strong alignment with WSUD principles through a site-wide strategy that integrates stormwater retention, filtration, detention, and controlled release.

Key elements of the approach include:

- **Rainwater capture and reuse:** A rainwater tank and water reuse system have been proposed to supply irrigation and potentially toilet flushing, thereby reducing the volume of stormwater runoff and improving resource efficiency. ¹¹³
- **Filtration and treatment devices:** The design specifies stormwater filters (Stormfilter 460 x 8) to treat private stormwater flows before discharge. This is supplemented by vegetated surfaces and structured soil zones which act as natural filtration systems. ⁴²
- **Site permeability and landscape integration:** The development increases overall permeability by embedding landscaped shared zones, deep soil planting, and vegetated swales that facilitate infiltration and slow the movement of water across the site. ⁴²
- **Alignment with ecological and cultural restoration:** The proposal seeks to integrate the natural and cultural significance of the site by treating stormwater not as waste but as a design input. The Clay Cliff Creek corridor is reimagined as a living, vegetated buffer zone that both interprets the site’s hydrological history and provides space for environmental buffering. ⁴²

Together, these initiatives show that the project goes beyond minimum compliance and adopts an integrated WSUD approach, consistent with best practice guidelines and the objectives of the Housing SEPP and Parramatta’s sustainability framework.

2. Are nature-based infrastructure solutions—such as rain gardens, vegetated swales, or bio-retention basins—used to improve hydrological function and ecological resilience?

Yes. The Gregory Place infrastructure strategy incorporates multiple nature-based solutions that enhance hydrological performance while improving local ecological conditions.

Key initiatives include:

- **Rain gardens and vegetated filtration areas:** The landscape plan includes planted biofiltration elements—described in the design documentation as “*vegetated filter strips and rain gardens*”—strategically located to treat stormwater from paved areas prior to infiltration or discharge. These elements increase the capacity of the site to absorb, clean, and slow water flows, reducing peak discharge volumes and pollutant loads.
- **Structured soil and softscape systems:** The shared landscape zones integrate structured soil cells and deep root planting zones, which enhance stormwater absorption and support robust vegetation, contributing to improved microhabitats.
- **Landscape hydrology alignment:** The proposed topography and planting strategy ensures water is directed through multiple landscaped corridors and swales. This not only improves the site’s hydrological function but also contributes to biodiversity uplift ^{42 139}.
- **Integration with cultural narrative:** The restoration of site hydrology is explicitly linked with the interpretive treatment of the Clay Cliff Creek alignment. Through topographic cues and water-sensitive planting, the project reconnects the ecological landscape to Country in a culturally informed way. ^{110 42}

The integration of these systems positions the proposal as a high-performing and contextually sensitive example of WSUD-led ecological infrastructure.

3. How does the stormwater strategy support restoration of the Clay Cliff Creek sub-catchment and broader catchment health through permeability, staged flow, and environmental buffering?

The Gregory Place stormwater strategy is designed to contribute positively to the health of the Clay Cliff Creek sub-catchment through a sequence of integrated WSUD interventions and permeability-based approaches.

- **Permeability and staged infiltration:** The civil and landscape strategies incorporate a hierarchy of surfaces including permeable paving, deep soil zones, and rain gardens to encourage staged infiltration and reduce impervious area coverage ⁴². This supports a slower, more natural hydrological cycle within the redeveloped precinct.
- **Distributed detention and release:** On-site detention (OSD) tanks are designed to attenuate peak flows from roof and hardstand areas. These are distributed across the site and configured to ensure staged release into vegetated swales, preventing scouring and improving downstream catchment performance.
- **Environmental buffering and hydrological mimicry:** Vegetated buffers along site boundaries act as bio-absorption zones. The topography is subtly shaped to direct surface flows through these buffers, mimicking pre-development sheet flow patterns and minimising concentration of runoff at any single outlet.
- **Alignment with catchment restoration intent:** The proposal demonstrates alignment with the ecological aspirations of the Clay Cliff Creek Catchment Restoration Strategy, through

enhancement of stormwater quality, increased infiltration, and mitigation of flow impacts to the downstream system ⁴².

These strategies enable the development to move beyond standard compliance, contributing to regional catchment improvement and the hydrological restoration of a historically altered landscape.

3.6.3.12.2 Energy and climate performance of infrastructure

4. Are the precinct's energy systems designed to reduce greenhouse gas emissions, including through embedded networks, centralised solar-ready systems, or passive energy distribution?

The Gregory Place development incorporates an integrated energy strategy that prioritises reduced operational emissions and future adaptability, in line with both statutory objectives and emerging best practice.

- **Solar-ready infrastructure:** All rooftops across the precinct have been designed and structurally engineered to support future solar photovoltaic (PV) arrays. The electrical systems and switchboards are battery-ready and permit solar integration through central inverters and energy storage systems.
- **Embedded energy network potential:** The electrical reticulation strategy provides the capacity for the introduction of an embedded network in future stages of delivery or operation. This would enable bulk purchasing of renewable electricity, reduce grid dependency, and promote energy equity across market and affordable dwellings.
- **Passive energy distribution and load reduction:** The architectural layout and building envelope design minimise cooling and heating loads through passive solar orientation, shading devices, and natural ventilation. This substantially reduces energy demand at the source, consistent with NABERS and BASIX emissions performance benchmarks ¹¹³.
- **High-efficiency systems and lifecycle performance:** Services including common area lighting, lifts, and hot water are designed to meet or exceed 5-Star NABERS equivalency. Equipment has been selected based on energy efficiency, durability, and maintenance minimisation—reducing lifecycle emissions.

Together, these measures establish a low-emissions energy framework that is adaptable, equitable, and capable of supporting long-term precinct-scale decarbonisation goals.

5. Has the energy and servicing infrastructure been evaluated for climate resilience, particularly under stressors such as extreme heat, localised flooding or grid instability?

Yes. The Gregory Place development integrates climate resilience measures into both the energy and servicing infrastructure to address foreseeable environmental stressors associated with climate change.

- **Extreme heat resilience:** The electrical infrastructure—including switchboards, cabling, and rooftop systems—has been specified to operate efficiently under elevated ambient temperatures, reducing the risk of equipment failure during heatwaves. Building services plant has been located and ventilated to minimise thermal loading and maintain operational continuity under projected heat conditions ^{113 136}.
- **Flood resilience:** Critical infrastructure elements such as transformers, switch rooms, and emergency egress lighting are either elevated above flood-prone levels or protected within sealed service enclosures to mitigate inundation risk. The stormwater design incorporates overland flow paths and OSD capacity, further reducing the likelihood of infrastructure exposure to flash flooding ¹³⁹.

- **Grid instability adaptation:** Battery-ready infrastructure and rooftop solar enable partial energy self-sufficiency in the future, improving resilience in the event of grid instability or blackouts. The energy system design includes provision for load-shedding hierarchies to prioritise essential services during power interruptions.
- **Climate-responsive landscape integration:** Landscape systems, including irrigation and smart controllers, are integrated with building services and weather-monitoring inputs to optimise resource use and prevent system failure during periods of drought or extreme weather ⁴².

These measures demonstrate that the project has been planned with an explicit understanding of local climate risk, consistent with the resilience objectives of the NSW Climate Change Policy Framework and Parramatta's LSPS.

6. Are rooftops, basements or common service corridors designed to perform dual environmental functions (e.g. solar platforms, green roofs, stormwater attenuation, passive cooling zones)?

Yes. The design of Gregory Place incorporates multi-functional infrastructure zones that deliver both service efficiency and ecological benefit, consistent with contemporary green infrastructure principles.

- **Rooftops:** The primary flat roof planes of each building have been designated as solar-ready platforms and are equipped to support future photovoltaic arrays. In addition to solar generation, these roofs include provisions for green roof modules on selected podiums, which contribute to stormwater detention, reduce ambient heat gain, and support local biodiversity through low-maintenance planting palettes ⁴².
- **Basements:** Basement levels have been planned with passive thermal buffering properties that assist in regulating building temperatures by capitalising on subgrade insulation. Service areas are acoustically and thermally isolated, and their layout avoids direct adjacency to sensitive heritage or residential interfaces.
- **Service corridors:** The common service corridors, including risers and voids, have been designed to accommodate future upgrades such as electric vehicle (EV) charging infrastructure and additional energy metering or storage systems. These corridors are thermally ventilated and allow for adaptive reconfiguration as technologies evolve ^{139 136}.
- **Podium and communal zones:** Above-basement podium structures also contribute to passive cooling and urban heat mitigation, with integrated rain gardens and deep soil zones embedded within the slab design. These areas function simultaneously as amenity zones and water attenuation infrastructure.

These co-located functions demonstrate the integration of environmental and operational infrastructure in a manner that supports long-term sustainability and resilience.

3.6.3.12.3 Circular economy and lifecycle performance

7. Are precinct-scale greywater reuse or stormwater harvesting systems integrated into the infrastructure network to reduce potable water demand and irrigate the landscape?

Yes. The Gregory Place development includes integrated water management strategies that reduce reliance on potable water by capturing, treating and reusing on-site water resources.

- The civil and stormwater engineering package confirms the use of *rainwater harvesting tanks* installed beneath podium slabs and within landscaped areas. These tanks collect roof runoff for reuse in non-potable applications including landscape irrigation and potentially toilet flushing within communal areas ^{136 139}.

- The WSUD Summary Memo details the technical specifications of these systems, including first-flush diversion, filtration units, and passive irrigation linkages to adjacent deep soil planting zones ¹³⁹.
- The Landscape Architectural Plans show irrigation layouts connected to harvested water sources. Smart irrigation controllers and sub-surface distribution methods are proposed to maximise efficiency and reduce evaporative loss. ⁴²
- While greywater reuse systems are not installed at dwelling scale, the common area servicing infrastructure has been designed to allow future adaptation. This is evidenced in the Environmental Design Statement, which outlines the strategic reservation of space and conduit access to support precinct-scale environmental upgrades.

These measures demonstrate a proactive alignment with circular water principles, reducing demand on municipal potable supply and enhancing the development's environmental resilience.

8. Does the material and systems strategy for infrastructure adopt low-impact materials, modularity, or lifecycle durability in accordance with circular economy principles?

Yes. The infrastructure systems at Gregory Place have been developed in line with circular economy principles, with specific emphasis on reducing embodied impacts, extending material life, and enabling future adaptability.

- The Material Schedule included in the architectural documentation identifies use of low-impact materials across infrastructure components, including prefabricated concrete elements with recycled aggregate, durable aluminium framing with long life expectancy, and modular cladding systems that support disassembly and reuse.
- According to the Environmental Design Statement, these materials have been selected for low embodied carbon, verified through Environmental Product Declarations (EPDs), and favour minimal finishing treatments to reduce lifecycle maintenance requirements.
- The Construction Management and Methodology Report confirms that key infrastructure assemblies (including stormwater detention modules, services risers, and rooftop mechanical plant bases) are designed for prefabrication and rapid installation. This minimises on-site construction time, reduces transport-related emissions, and facilitates component replacement or repurposing in the future.
- Infrastructure ducts, risers and subfloor service trays are designed with modularity in mind, allowing for upgrades and replacement of system components without wholesale demolition, consistent with circular design best practice.

This strategy demonstrates a shift away from traditional linear construction models toward a regenerative and resource-efficient approach to infrastructure delivery.

9. How do service rooms, waste enclosures and infrastructure nodes support future food/organic waste separation, material recycling, and efficient resident participation?

The Gregory Place infrastructure layout has been explicitly designed to support advanced waste separation systems and resident engagement in sustainable waste practices.

- Service rooms and waste enclosures at basement and ground levels include dedicated compartments for general waste, commingled recyclables, and organic (food and garden) waste. These enclosures follow the NSW EPA's *Better Practice Guide for Multi-Unit Dwellings* and are

scaled to meet projected waste generation rates while providing clear spatial separation of waste streams¹⁴⁰.

- The Waste Management Plan confirms the inclusion of tri-stream bin systems and outlines protocols for organic waste collection and diversion. This includes colour-coded signage, wheeled bin infrastructure for food organics and garden organics (FOGO), and integration with Council’s current and future organic waste collection initiatives ¹³².
- The architectural plans and basement layouts show that all enclosures are mechanically ventilated and acoustically insulated to reduce amenity impacts, with sufficient clearance for collection vehicle access and staging.
- Resident participation is supported through provisions in the building manager’s operational guide, which includes onboarding education materials, regular reminders, and performance tracking notices within communal areas (e.g. foyers and lifts), encouraging compliance and awareness.
- The precinct layout facilitates direct vertical waste transport via chutes or lifts, avoiding long haul distances and improving accessibility for residents with mobility limitations. This enhances uptake of source-separated waste behaviour and contributes to council’s long-term landfill diversion targets.

3.6.3.12.4 Monitoring and adaptive environmental systems

10. Is performance monitoring infrastructure (e.g. metering of energy, water, waste) embedded in the design to allow long-term tracking of environmental outcomes?

Yes. Performance monitoring is embedded into the infrastructure design to support long-term tracking of key environmental indicators.

- All dwellings and common areas are equipped with individual energy and water sub-metering, enabling both occupant awareness and facility-level environmental performance management.
- Centralised building management systems (BMS) will be installed to track electricity, water, and hot water usage across building zones, allowing for ongoing benchmarking and adaptive servicing.
- The Waste Management Plan includes provision for periodic waste volume tracking and reporting by the building manager, with records supporting council compliance audits and tenant feedback loops.

This integrated monitoring framework enables evidence-based operational decisions, supports the pursuit of NABERS or Green Star performance ratings, and ensures that the infrastructure delivers enduring sustainability outcomes.

11. Are the utility networks designed with technical flexibility for future upgrades such as electric vehicle charging, energy storage, precinct-level microgrids or recycled water loops?

Yes. The development’s service infrastructure has been deliberately configured to accommodate future technological upgrades and emerging sustainability initiatives.

- The electrical distribution board and riser design allows for the staged installation of electric vehicle (EV) charging systems, with all basement parking bays provisioned for conduit capacity and load balancing infrastructure.

¹⁴⁰ City of Parramatta Waste Management Guidelines (2022) and NSW EPA Better Practice Guide for Multi-Unit Dwellings (2021)

- Battery-ready switchboards and spare circuit capacity enable future installation of solar PV battery storage systems and grid-responsive control technologies.
- Hydraulic infrastructure includes dual plumbing in common areas, allowing future integration of recycled water systems (e.g. for toilet flushing or irrigation) without major retrofits.
- Design provisions allow for connection to potential precinct-scale energy infrastructure or embedded networks, consistent with distributed energy and utility resilience principles endorsed by the NSW Government.

These provisions reflect a forward-compatible infrastructure model that enables responsive environmental management over the asset lifecycle.

12. Does the proposed infrastructure strategy align with or exceed the targets and performance measures articulated in council's Environmental Sustainability Strategy and other applicable NSW Government frameworks?

Yes. The infrastructure strategy aligns closely with the targets of the council's Environmental Sustainability Strategy (ESS) and relevant NSW Government frameworks such as the Net Zero Plan Stage 1 and the Design and Place SEPP (now integrated into the Housing SEPP).

- The development supports council's objectives around urban heat mitigation, WSUD and energy performance, including tree canopy targets, sustainable stormwater infrastructure, and high-efficiency building services.
- The project is consistent with state targets for emissions reduction, urban greening, and water efficiency as promoted under the Net Zero Emissions Plan and BASIX reforms.
- Specific precinct-scale initiatives—such as passive cooling via landscaping, on-site detention with ecological co-benefits, and EV readiness—demonstrate an approach that goes beyond compliance and positions Gregory Place as a model of integrated environmental performance.

3.6.3.13 Theme 7 compatibility summary

The Gregory Place proposal demonstrates a high level of environmental compatibility in terms of integrated infrastructure design, ecological function, and long-term climate resilience. The infrastructure strategy responds directly to the objectives of the EP&A Act (particularly the promotion of ecologically sustainable development), the Housing SEPP 2021, and the council's Environmental Sustainability Strategy, by embedding environmental value within core infrastructure systems.

Across all categories assessed—stormwater, energy, water, waste, and climate adaptability—the proposal integrates nature-based and passive systems that extend beyond minimum compliance. The water management strategy is explicitly grounded in WSUD principles, with rain gardens, bioretention basins and on-site detention (OSD) systems contributing to hydrological health, including improvements to the Clay Cliff Creek sub-catchment. These interventions demonstrate clear ecological benefit while protecting sensitive heritage landscapes.

Energy infrastructure has been planned with dual-use and future-ready capacity, including solar-ready rooftops, embedded network design, and electric vehicle charging infrastructure. These systems align with State objectives for net zero emissions and distributed energy resilience. Furthermore, thermal buffering, green roofs, and ventilated service corridors demonstrate merit-based integration of infrastructure and climate response.

The proposal also incorporates circular economy principles through modular infrastructure design, low-impact materials, greywater reuse readiness, and waste separation infrastructure that supports

behavioural change at both the household and precinct levels. Monitoring systems and flexible service corridors ensure that performance can be tracked and improved over time, positioning the development for long-term sustainability.

Importantly, the infrastructure systems do not operate in isolation but form part of a broader ecological integration strategy. Their performance is compatible with the surrounding residential and heritage contexts due to their low-impact nature, passive operation, and landscape-sensitive siting. Collectively, these elements contribute to a coherent and adaptive urban environment that reflects best-practice environmental planning.

From a legal and statutory perspective, the infrastructure systems meet or exceed the relevant environmental performance benchmarks outlined under the Housing SEPP 2021 and EP&A Act. In merit terms, they reflect a deliberate transition away from legacy industrial servicing to a future-oriented, environmentally responsive urban framework. This reinforces the proposal's environmental compatibility and supports its alignment with the desired future character of the Harris Park precinct.

3.6.3.14 Alignment with key local and international academic environmental urban policy research

The environmental infrastructure and ecological integration strategy proposed for Gregory Place reflects contemporary best practice as established in both local and international academic literature. The project's emphasis on passive systems, nature-based solutions, and precinct-scale adaptability situates it within a body of research focused on climate-responsive, sustainable urbanism.

At the national level, the proposal aligns with the principles outlined by Newton et al. in their work on sustainable precincts, which emphasises the importance of integrated design, environmental performance, and liveability across the urban development lifecycle¹⁴¹. Gregory Place adopts this systems-based approach, treating infrastructure not as isolated technical assets but as interconnected environmental features that generate long-term value.

Recent research by Sharma et al. confirms the role of integrated WSUD and urban canopy strategies in reducing localised heat and improving human thermal comfort in higher density settings¹⁴². These findings directly support the Gregory Place approach, which includes integrated stormwater infrastructure, rain gardens, subsoil filtration, and over 25% canopy coverage.

Internationally, the work of Benedict and McMahon on green infrastructure has shaped modern understandings of ecological compatibility, advocating for infrastructure networks that link natural systems with human settlements¹⁴³. The multifunctional infrastructure strategy at Gregory Place—including rooftop solar readiness, dual-purpose basements, and green podiums—demonstrates this paradigm by delivering layered environmental benefits from shared spatial systems.

The Ellen MacArthur Foundation's circular economy framework also underpins the project's infrastructure design. The adoption of lifecycle-optimised materials, modular waste infrastructure, and future-ready utility corridors responds to research identifying material efficiency and adaptability as critical to environmental compatibility in urban precincts¹⁴⁴.

¹⁴¹ Newton, P., Newman, P., Glackin, S., & Trubka, R. (2013). *Greening the Greyfields: Unlocking the redevelopment potential of the middle suburbs in Australian cities*. Australian Housing and Urban Research Institute (AHURI)

¹⁴² Sharma, A., Moore, T., & Santamouris, M. (2022). "Impacts of green infrastructure on urban heat mitigation: A systematic review and meta-analysis." *Urban Climate*, 41, 101057.

¹⁴³ Benedict, M. A., & McMahon, E. T. (2006). *Green Infrastructure: Linking Landscapes and Communities*. Island Press.

¹⁴⁴ Ellen MacArthur Foundation. (2020). *Completing the Picture: How the Circular Economy Tackles Climate Change*. Retrieved from <https://ellenmacarthurfoundation.org>

Crucially, the infrastructure and ecological systems at Gregory Place are consistent with State priorities set out in the NSW Climate Change Policy Framework (2016) and the *Resilient Sydney Strategy* (2018), which both call for precinct-scale urban systems to embed resilience to heat, storm, and energy disruption¹⁴⁵. The project incorporates distributed water retention, passive cooling, rooftop solar readiness, and climate-adaptable corridors—each of which contributes to the department’s benchmarks for sustainable design, set out in the NSW Government’s Guide to Climate Resilient Development (2022)¹⁴⁶.

Accordingly, the Gregory Place infrastructure strategy is not only locally responsive but globally informed. It translates evidence-based design principles into built form outcomes, advancing the NSW Government’s climate adaptation agenda while delivering high-performing, resilient, and equitable infrastructure for future residents.

3.6.4 Conclusion: environmental compatibility and sustainability

The environmental compatibility of the Gregory Place proposal has been tested through a deliberately rigorous and multi-layered evaluation. Drawing upon legal precedent, statutory direction, academic literature, and expert evidence, the assessment confirms that the revised scheme does not merely mitigate environmental harm—it restores and enhances the environmental, heritage, and cultural systems within which it is embedded.

Compatibility in this context is not judged by sameness or replication. As affirmed in *Project Venture Developments v Pittwater Council* [2005] NSWLEC 191 and successive decisions, compatibility rests on whether a proposal can coexist with and support the desired future character, particularly in sensitive heritage landscapes undergoing planned transformation. This principle has guided the Gregory Place environmental assessment, which recognises that contextual change—when executed with care and purpose—can improve compatibility and correct prior planning legacies.

At the core of this proposal lies a simple but powerful act of environmental reconciliation: the removal of a large, visually intrusive and impermeable industrial structure and its replacement with a lower-scale, permeable, architecturally refined, and environmentally attuned residential precinct. This substitution alone removes a long-standing environmental conflict between industrial use and cultural setting, particularly in proximity to nationally significant colonial heritage items and a riparian corridor of longstanding Aboriginal importance.

The proposal has been shaped through deep engagement with the statutory and strategic framework:

- Under the EP&A Act(s 1.3 and s 4.15), the project promotes ecologically sustainable development, conserves built and cultural heritage (including Aboriginal cultural heritage), and transitions the site to its intended land use in an orderly and publicly beneficial manner.
- Under the Housing SEPP 2021, particularly clause 39, the project demonstrates compatibility with the character of the local area, interpreted through design quality, sustainability, and contextual integration.
- At the local level, the site’s alignment with the Parramatta LSPS and Housing Strategy supports the transition from obsolete industrial land to a more environmentally and socially functional use, while preserving and enhancing cultural legibility and landscape systems.

¹⁴⁵ NSW Government. (2018). *Resilient Sydney: A Strategy for City Resilience*, Office of Emergency Management.

¹⁴⁶ NSW Department of Planning and Environment. (2022). *Guide to Climate Resilient Development: Incorporating resilience in land use planning and assessment processes*.

Expert input across disciplines has been critical to shaping a compatible scheme. Heritage advice from GBA Heritage guided setback calibrations, view corridor protection, and the articulation of building form in relation to Experiment Farm, Hambledon Cottage, and Elizabeth Farm. Aboriginal heritage experts and landscape architects Yerrabingin integrated Country-based principles through interpretation, planting, and water-sensitive design, restoring historical ecological flows associated with the Clay Cliff Creek chain of ponds. Architectural and acoustic testing by Tzannes, SLR, and Renzo Tonin have ensured that building massing, thermal and visual performance, and amenity outcomes respond effectively to site constraints, climatic needs, and neighbour relationships.

Importantly, the proposal was informed and refined through the advice of the HCAC, Design Review Panel (SDRP), and government agencies. Design changes—such as reduction of height in Building C, deepened northern setbacks, view corridors toward OLOLC, and publicly accessible green links—demonstrate direct responsiveness to concerns raised by the community and experts alike. These are not cosmetic shifts; they are structural acts of environmental integration and heritage responsiveness.

The project also demonstrates alignment with contemporary planning research. As noted by Bunker, Holloway, and Gurrán, environmental compatibility in infill development requires the strategic layering of new infrastructure with ecological and cultural systems. This proposal exemplifies that approach. It is not monolithic—it is broken into scaled forms, framed by landscape, integrated with water flows, and porous to movement and views. It respects the built rhythm of the precinct and strengthens its underlying environmental and social fabric.

This is best exemplified in the return of landscape as an organising principle. The proposal reintroduces deep soil zones, supports mature tree retention and biodiversity, and interprets both pre-colonial and colonial environmental patterns through design. These elements do not simply offset built form—they anchor it. In doing so, the project reclaims the site's ecological and cultural functions, restoring a sense of place and continuity long subjugated by industrial infrastructure.

Thus, when judged against the statutory, policy, academic and performance frameworks that define contemporary environmental compatibility, the Gregory Place proposal achieves a strong and supportive conclusion. It is not only permissible—it is desirable. It demonstrates that high-quality, sustainable, and culturally literate infill development is possible within a complex heritage landscape.

It replaces harm with healing, concrete with canopy, and exclusion with accessibility.

It represents compatibility not as compromise—but as opportunity.

Assessing compatibility is inherently complex—particularly in the environmental context, where community expectations, ecological processes, urban character, and cultural sensitivities intersect. These challenges are amplified in heritage precincts undergoing planned transition, where the burden of interpretation can obscure the clarity of planning outcomes for both assessors and the public.

To address this, a structured analytical framework—the Daniel Matthews compatibility assessment model—was applied. This model organises key performance themes into a coherent structure, enabling environmental performance to be evaluated through targeted questions grounded in law, policy, and expert evidence. Each environmental domain (e.g. solar access, biodiversity, acoustic impacts, heritage integration, landscape functionality) was systematically examined, drawing on multidisciplinary documentation and aligned with statutory objectives and the desired future character.

This thematic methodology brings transparency to a traditionally opaque planning concept. It allows compatibility to be tested, explained, and communicated in a way that is measurable, contestable, and legible to decision-makers and the community alike. By applying this model, the assessment not only

arrives at a defensible conclusion—it demonstrates the intellectual pathway by which that conclusion has been reached in a multidisciplinary process.

In this way, the compatibility assessment is not only a planning test—it is a process of civic accountability. The Gregory Place proposal meets that test through evidence, integrity, and design excellence.

3.7 Final compatibility assessment and conclusion

Assessing compatibility is a complex and inherently contextual exercise. It requires an interrogation of how a proposed development interacts with its surroundings—not only in physical terms, but in terms of community values, strategic intent, environmental systems, and long-term social equity. These layers of complexity are amplified in locations such as Gregory Place, where heritage significance, urban renewal, housing need, and landscape function converge.

To address this complexity, the Gregory Place compatibility assessment has adopted the compatibility assessment matrix Model—a thematic and structured framework designed to bring clarity, transparency, and accountability to compatibility determinations. The model responds to an often-cited challenge in the planning system: that compatibility is both important and underdefined. By applying this model, the assessment transforms compatibility from a subjective planning judgement into a measurable, contestable, and community-facing process.

This is a model rooted in law and purpose. The foundational statutory framework for compatibility arises from:

- Section 1.3 of the EP&A Act, which sets out objectives to:
 - Promote the orderly and economic use and development of land,
 - Facilitate ecologically sustainable development by integrating relevant environmental, social and economic considerations,
 - Promote the sustainable management of built and cultural heritage (including Aboriginal cultural heritage),
 - Provide increased opportunities for public involvement and participation in environmental planning and assessment.
- Section 4.15(1)(b), which mandates consideration of the likely environmental impacts of the development, including the natural and built environment, and social and economic impacts in the locality.
- Clause 39 of the Housing SEPP 2021, which expressly requires that an application for SSD under Chapter 6 demonstrate compatibility with the character of the local area—a term interpreted by both statute and jurisprudence to include the physical, social, economic, cultural and environmental character of a place.

These provisions require not only that development comply with controls, but that it *promote public value*. Compatibility, in this sense, is not static or aesthetic—it is purposeful. It is about whether a development contributes to a better, more equitable, and more sustainable future for the community.

This understanding has been affirmed through leading judicial authority, including:

- *Project Venture Developments Pty Ltd v Pittwater Council* [2005] NSWLEC 191 – Roseth SC established a two-limb compatibility test: whether the proposal is consistent with the *existing or desired future character* of the locality and whether it *integrates well into its surroundings*.
- *Helou v Strathfield Municipal Council* [2006] NSWLEC 66 – Commissioner Moore emphasised that compatibility with heritage items requires consideration of *cultural significance, legibility, spatial setting, and the sustainability of heritage values*, not simply view lines or proximity.
- *Demir v Georges River Council* [2021] NSWLEC 1339 and *Zhang v Inner West Council* [2022] NSWLEC 1213 – affirmed that compatibility is *relational, contextual*, and may be achieved without replication, especially in settings undergoing strategic transition.
- *Koh v Liverpool City Council* [2017] NSWLEC 1358 – reinforced that compatibility with heritage is achieved when new development *sustains and enhances* the significance of a place rather than detracting from it.

These cases, alongside the statutory framework, form the legal and policy foundation for the conclusion that follows.

Social compatibility

As established in 3.4 Social compatibility: Context and method of assessment and throughout the social compatibility analysis, this proposal is first and foremost about people. It responds directly to a critical shortfall in moderate-income rental housing, delivering new homes for key workers, single-parent households, young families, and older people—all of whom are increasingly excluded from inner-urban rental markets.

Compatibility here is measured not in abstraction, but in *civic terms*. Will this project support an inclusive, safe, connected and thriving community? Yes. The project integrates communal spaces, promotes passive surveillance, protects heritage, and enhances the legibility of place. It is supported by social infrastructure, walkability, and urban services. It offers housing with dignity and design, supported by expert urban design input and clear strategic alignment.

Economic compatibility

As detailed in 3.5 Economic Compatibility, the existing industrial building is no longer economically sustainable or strategically supported. It represents a legacy use in a transformed urban context. The proposal replaces it with a build-to-rent model aligned with council and state economic strategies, including the reactivation of urban land to deliver jobs, housing diversity and investment.

Importantly, it does so without displacement or gentrification. This is not a speculative market housing project—it is a privately funded public good, delivering affordable rental housing in a location where it is urgently needed and policy-supported.

Environmental compatibility

The project delivers substantial environmental improvement. As shown in 3.6 Environmental Compatibility Assessment and tested through 19 performance domains, the proposal replaces impermeable built mass with deep soil landscaping, water-sensitive design, habitat creation, and integrated heritage interpretation. Aboriginal connection to Country has been respected and embedded in the design process, delivering a place that is culturally reconciliatory and environmentally responsive.

The legacy building imposed environmental harm. Its removal, and replacement with a permeable, landscape-integrated scheme, restores ecological systems and supports long-term urban resilience.

Integrated conclusion

The final synthesis of compatibility—step six of the Daniel Matthews Model—asks whether the development is, in its *totality*, compatible with its context and the public interest.

The answer is yes.

This conclusion rests on six integrative findings:

1. The project addresses *strategic housing need* while protecting and enhancing *heritage and place*.
2. It is *statutorily compliant*, aligning with the objectives of the Act and the Housing SEPP.
3. It responds to *community submissions* with integrity and refinement.
4. It is *economically adaptive*, transforming a declining site into a socially productive precinct.
5. It is *environmentally redemptive*, restoring systems and reconnecting with landscape and Country.
6. It is *about people*—their housing needs, their social context, their right to belong in cities of opportunity and meaning.

This is not a case of overdevelopment, nor a case of mimicry. It is a case of well-considered, policy-aligned, people-centred urban change.

Final recommendation

On this basis, and in line with the legal, strategic, and community-facing objectives of the planning system, the Gregory Place redevelopment is found to be *compatible* with its setting, both current and future. It should be supported.

4 Analysis of submissions

The EIS was publicly exhibited from Tuesday 2 August 2022 to Monday 29 August 2022. A wide range of issues were raised and are discussed in more detail under Section 6 of this report. The wide range of issues can be grouped into subcategories and from there themes.

The way that the response to submissions has been structured, is to address the matters in detail raised by the department, independent review, agencies, design panels and heritage organisations; to address how the project has been adjusted to address these submissions, and then to consider public submissions as themes given the large duplication of matters raised.

The attached design report at Appendix A, considers these themes under Section 3 and considers how these have been addressed as part of the revised scheme under Section 5. A summary of the main issues and the register of issues is outlined below:

1. Desire for location to be open space
2. First Nations Engagement
3. Overall bulk and scale
 - 3.1 Height and built form
 - 3.2 Heritage impacts
 - 3.3 View impacts
 - 3.4 Stormwater Channel
 - 3.5 Flooding
 - 3.6 Noise
 - 3.7 Privacy

4. Vehicular Access

Further, there are 54 themes grouped under the public submissions, and these are considered in more detail under section 8 of this report.

4.1 Register of submissions

In total, 111 submissions have been received, including public agencies, local organisations and public submissions. These range in quantity and quality, from detailed analysis and feedback to short messages from public submitters. To assist understand the range and types of submissions, the below Table 10 provides a register of all submissions received during the exhibition period in August 2022, with a more detailed register included at Appendix B.

Table 10 Register of Submissions

No.	Respondent	Date	Document	Section
1	Department of Planning and Environment	7/9/2022	Response to Submissions	7.1
2	Department of Planning and Environment	21/11/2022	Independent Heritage and Urban Design Review	7.2
3	City of Parramatta	1/9/2022	NOTICE OF EXHIBITION OF ENVIRONMENTAL IMPACT STATEMENT FOR THE GREGORY PLACE BUILD TO RENT SCHEME (2A GREGORY PLACE, HARRIS PARK)	7.4
4	Delegate of the Heritage Council of NSW	12/5/2023	State Significant Development (SSD) Gregory Place Build-to-Rent – 2A Gregory Place, Harris Park (SSD-31179510)	7.5.1
5	Heritage NSW	10/3/2021	State Significant Development (SSD) Exhibition of Environmental Impact Statement (EIS) Gregory Place Build-to-Rent – 2A Gregory Place, Harris Park (SSD-31179510)	7.5.1
6	Heritage NSW	22/8/2025	HERITAGE NSW – ABORIGINAL CULTURAL HERITAGE ASSESSMENTS STATE SIGNIFICANT DEVELOPMENT (SSD) EXHIBITION OF ENVIRONMENTAL IMPACT STATEMENT	7.5.1
7	Fire and Rescue	4/8/2022	Re: Advice on Environmental Impact Statement (EIS) - Gregory Place Build-to-Rent – (SSD-31179510)	7.5.2
8	SES	29/8/2022	Environmental Impact Statement (EIS) for 2A Gregory Place Harris Park “Build-to-Rent” State Significant Development (SSD)	7.5.3
9	Sydney Water	11/8/2022	RE: Development Application SSD-31179510 at 2A Gregory Place (Build-to-rent) Harris Park	7.5.4
10	Department of Planning and Environment: Water	31/10/22	Gregory Place Build-to-Rent (SSD-31179510) - Environmental Assessment	7.5.5
11	TfNSW	6/10/2022	GREGORY PLACE BUILD-TO-RENT DEVELOPMENT – 2A GREGORY PLACE, HARRIS PARK	7.5.6

No.	Respondent	Date	Document	Section
12	National Trust	29/8/2022	National Trust objection relating to SSD-31179510 Gregory Place Build-to-Rent	7.6.1
13	National Trust	1/9/2022	National Trust objection relating to SSD-31179510 Gregory Place Build-to-Rent	7.6.1
14	PARRAMATTA & DISTRICT HISTORICAL SOCIETY	29/8/2022	Gregory Place Harris Park Build-To-Rent SSD-31179510	7.6.2
15	Mecone; on behalf of the Trustees of the Roman Catholic Church for the Diocese of Saint Maron, Sydney also known as the Maronite Catholic Eparchy of Australia, New Zealand and Oceania	29/8/2022	RE: Submission regarding Gregory Place Build-to-Rent State Significant Development (SSD).	7.6.3
16	OLOL Co-Cathedral		Have your say regarding development proposal at 2A Gregory Place Harris Park adversely impacting OLOL Co-Cathedral - Change.org Petition	8
17	National Trust – Parramatta Branch	29/8/2022	Parramatta Regional Branch OPPOSITION to SSD-31179510 Gregory Place Build-to-Rent	8
18	Tony Harb	28/8/2022	Re: EXHIBITION OF STATE SIGNIFICANT DEVELOPMENT APPLICATION GREGORY PLACE BUILD-TO-RENT (Application Number: SSD-31179510)	8
19	D. Sassine	29/8/2022	Gregory Place Build-to-Rent ; Submission: SUB-47861206	8
20	Ian Stephenson	29/8/2022	Re: DA 2 Gregory Place, Harris Park build to rent	8
21	Redacted	29/8/2022	I object to the proposed 'Gregory Place Build-to-Rent' (BTR) development (SSD-31179510)	8
22	Form letter. (Multiple respondents)		2A Gregory Place PTY LTD SSD-31179510-Gregory Place BTR.	8
23	Michael Gettany		Object	8
24	Name Withheld		Object	8
25	Brad Powe		Object	8
26	Name Withheld		Object	8
27	Robert Power		Object	8
28	Rebecca McRae		Object	8
29	Susan Sedgwick		Object	8
30	Lisa Harrold		Object	8
31	Name Withheld		Object	8
32	Name Withheld		Object	8
33	Name Withheld		Object	8
34	Name Withheld		Object	8
35	Name Withheld		Object	8
36	Sydney Living Museums		Object	8
37	Ann Boutros		Object	8
38	Gisele LAMY		Object	8
39	Anne Smith		Object	8
40	Kim Riley		Object	8

No.	Respondent	Date	Document	Section
41	National Trust of Australia (NSW) Parramatta Regional Branch		Object	8
42	Friends of Fernhill and Mulgoa Valley Inc		Object	8
43	Anne Crabb		Object	8
44	Our Lady of Lebanon Co-Cathedral		Object	8
45	Parramatta and District Historical Society		Object	8
46	Our Lady Aged Care Centre Ltd		Object	8
47	Roman Catholic Church for the Diocese of Saint Maroun, Sydney		Object	8
48	Janet Hay		Object	8
49	Name Withheld		Object	8
50	Jane Stanham		Object	8
51	Chloe Bou Serhal		Object	8
52	Name Withheld		Object	8
53	Rita Leila Tannous		Object	8
54	John Noujaim		Object	8
55	Younan Freifer		Object	8
56	Ramona Yammouni		Object	8
57	Name Withheld		Object	8
58	Vivian Wakim		Object	8
59	Name Withheld		Object	8
60	Name Withheld		Object	8
61	Charles Baltasar		Object	8
62	Peter Watts		Object	8
63	Name Withheld		Object	8
64	Name Withheld		Object	8
65	Name Withheld		Object	8
66	Name Withheld		Object	8
67	Name Withheld		Object	8
68	Michael Gettany		Object	8
69	Name Withheld		Object	8
70	Rita Ghossein		Object	8
71	Arthur Sadek		Object	8
72	Name Withheld		Object	8
73	Name Withheld		Object	8
74	Joanne Elias		Object	8
75	Name Withheld		Object	8
76	Name Withheld		Object	8
77	Name Withheld		Object	8
78	Maronite College of the Holy Family, Parramatta		Object	8
79	Merry Matt		Object	8
80	Name Withheld		Object	8
81	Name Withheld		Object	8
82	Richard Khoury		Object	8
83	Jo-beth Elias		Object	8

No.	Respondent	Date	Document	Section
84	Carla Elias		Object	8
85	Name Withheld		Object	8
86	Brigid Logue		Object	8
87	Georgette Elias		Object	8
88	Clive Lucas		Object	8
89	Name Withheld		Object	8
90	Name Withheld		Object	8
91	George Elzahoul		Object	8
92	Name Withheld		Object	8
93	JOHN ELIAS		Object	8
94	Mireille Chrabieh		Object	8
95	Joe Abboud		Object	8
96	Name Withheld		Object	8
97	Name Withheld		Object	8
98	William Bassil		Object	8
99	Johnny Kazzi		Object	8
100	Suzie Taouk		Object	8
101	Name Withheld		Object	8
102	Name Withheld		Object	8
103	pierre kazzi		Object	8
104	Maroun Chidiac		Object	8
105	Marcel Chalhoub		Object	8
106	Name Withheld		Object	8
107	Our lady of Lebanon church		Object	8
108	Name Withheld		Object	8
109	Pauline Kazzi		Object	8
110	David Hoffman		Object	8
111	Name Withheld		Object	8

4.2 Summary of Issues Raised

In response to the exhibition seven submissions were received from public authorities and a number of concerns expressed on behalf of key community organisations, businesses and other stakeholders. This included the following:

- Department of Planning and Environment (now Planning, Housing and Infrastructure)
- Department of Planning and Environment: Water
- City of Parramatta Council
- NSW State Emergency Services
- Heritage NSW – Aboriginal Cultural Heritage Assessments
- Heritage NSW
- NSW Fire and Rescue
- Sydney Water
- Transport for NSW

- The Trustees of the Roman Catholic Church for the Diocese of Saint Maron
- Parramatta and District Historical Society
- National Trust
- National Trust (Parramatta Regional Branch)

Table 11 Agencies' and organisations' submissions

Stakeholder	Key Comments
Department of Planning and Environment (as it was known at the time)	The height and scale of the proposal is not supported as it will cause overshadowing to the adjacent child care centre, cause potential privacy issues and potential heritage impacts to nearby items. The scale and height of the concept is not in keeping with the character of the area. There is substantial overshadowing of the creek corridor walk in mid-winter, combined with narrow setbacks will create poor amenity outcomes for users. The setback to Gregory Place should be at least 6 metres to conform with the surrounding residential area and allow large trees to grow. Potential removal of trees that are recommended for retention. Ensuring that landscaped areas a high quality and useable. Importance of understanding the visual impacts from key view points and the impacts on historic view corridors. Ensuring an adequate understanding of flood impacts. Traffic impacts and rationale for proposed parking rates. The physical distribution of the affordable dwellings with the market dwellings on the site will be important.
City of Parramatta Council	Flooding issues on the site and work being done to address this as part of the proposal such as pre and post flood modelling. Concerns around the built form and its relationship to Experiment Farm, Elizabeth Farm and Hambledon Cottage and the surrounding context in Gregory Place, as it does not adequately respond to this important heritage and low scale residential context, the unique site characteristics, streetscape and existing and future character of the locality. Interface between Hambledon Cottage and the proposed buildings is an important consideration. This historic district provides a 'breathing space' for these dense development areas and is not an extension of the high density CBD areas. Concerns that the concept proposal severs the landscape setting and heritage relationship between Experiment Farm, Elizabeth Farm and Hambledon Cottage. The proposed site planning results in the impression of a private gated estate, with a majority of the site isolated from the public domain and without a street address. Exploration of a more open road within the site along the Northern boundary, to replace the proposed private accessway. Concerns over Building C, which appears to be the bulkiest building within the site, with no setback or transition in height to its context. Concern over the parking rate adopted and the potential traffic impacts. The façade along Gregory Place should be articulated and modulated to reflect the existing subdivision and dwelling patterns on the street. Delineation of public, communal and private spaces and pathways on all architectural drawings. This should include any areas fenced off from the public. Potential poor amenity along Clay Cliff Creek. Connection of the development with its surroundings, through permeability, legibility and landscape strategies.
Heritage NSW	Concerns with the overall bulk and scale of the development in relation to heritage impacts, and looks forward to the sightline analysis, previously requested.

Stakeholder	Key Comments
	Noted the location is in a precinct of national heritage significance and that ideally, such a location would be retained as an open space, as has been done around Experiment Farm Cottage. Concerns with the height of Building C, with a maximum height of 2 storeys. Note there was no evidence base to this height limit, so it is not clear how this height requirement was formed. Need for a more considered outcome for development in this location. Need for a more accurate and detailed assessment of key views. HNSW recognised the positive developments in nuanced design and public realm responses, however the scale of the development at certain critical points remained a concern.
Heritage NSW – Aboriginal Cultural Heritage Assessments Team	To ensure an Aboriginal archaeological research design and test excavation methodology is to be developed for the site. Concerns in relation to the amenity of the Clay Cliff Creek walk and ability to achieve a high quality and useable pedestrian experience. Need to further understand potential visual impacts from key site lines and locations, and that this should be further assessed. Concerns in relation to the height and scale of Building C which should be redesigned to mitigate visual impacts from the adjacent Experiment Farm Reserve that forms part of the significant landscape setting of Experiment Farm Cottage. Ensuring a landscape management plan promotes permeability and connectivity, and that fencing does not create negative visual impacts. An Interpretation Strategy is essential, and should ensure continued consultation with the Aboriginal community to inform the design.
NSW Fire and Rescue	Provided no comments or recommendations on the proposal as the project has limited scope and application in regards to special hazards or foreseeable problems in firefighting.
NSW State Emergency Services	Further consideration of the full range of flooding is required to fully understand the potential flooding impacts and impacts to evacuation routes. Concerns with wholly relying on ‘shelter in place’ strategies as a management tool for evacuation. Would not support development below the council’s flood planning level.
Sydney Water	Concerns about the potential intention that the proponent is to modify Sydney Water’s stormwater channel which would not be supported without prior agreement with Sydney Water. Ensuring the Clay Cliff Creek walk is a minimum of 1 metre away from the outside face of the Clay Cliff Creek wall. Sydney Water provided general advice on practical development elements associated with the project and its relationship/proximity to the stormwater channel.
Department of Planning and Environment: Water	DPE Water Assessments provided a number of recommendations in relation to ‘minimal impact considerations’, groundwater take, and a Water Access License.
Transport for NSW	Acknowledged the site’s good access to public transport services including bus, heavy rail and the future light rail. Also acknowledged that the site is within a reasonable walking/cycling distance to the CBD and public transport services and therefore limiting the amount of carparking should be considered to discourage car driving as a preference. Encouraged the project to explore opportunities to establish or improve walking or cycling connections to/from the site to the CBD and public transport stations/stops. Encourage a good supply of quality End of Trip (EoT) facilities and bicycle parking encourages more walking and cycling mode shares. Recommended that the project upgrade the existing footpath along the western side

Stakeholder	Key Comments
	of Gregory Place and along the southern side of Hassall Street, between Gregory Place and opposite house no. 56, to a shared path.
The Trustees of the Roman Catholic Church for the Diocese of Saint Maron	Concerns in relation to the height and scale of the development and the compatibility with the context and character of the area. The development is unsympathetic to surrounding buildings. Concerns in relation to the privacy and overshadowing impacts on the adjoining child care centre associated with the OLOL Co-Cathedral. Potential solar access to the translucent stained-glass windows within the OLLC which may be compromised, detracting from the visual attractiveness of the cathedral. Potential noise impacts associated with 483 additional dwellings on the site on the OLOL Co-Cathedral and surrounding low density residential development. Potential construction noise impacts. Concerns in relation to visual impacts associated with the height and bulk of the development, including views from OLOL to surrounding heritage items, and their landscaped setting. The views of the cathedral in its own setting with also be compromised by the height and bulk of the development. Concerns that the proposed development will negatively impact the potential future development of the OLOL Co-Cathedral site. The proposal is inconsistent with the surrounding landscape and character of the area, including surrounding heritage setting and low density development. Failure of the proposal to celebrate and acknowledge Aboriginal culture. Engagement with the Aboriginal community is considered minimal. The proposal does not take into account the importance of Clay Cliff Creek or try to restore a natural creek. Potential negative parking and traffic implications to the surrounding sites. Potential flood liability and impacts associated with proximity to Clay Cliff Creek. Concerns about the level and amount of meaningful engagement with surrounding and nearby landowners and stakeholders. Concerns that the development does not adequately address the requirements of the SCC, particularly in relation to compatibility with surrounding existing and approved uses and environmental constraints. OLOL supports the use of the land as residential as the existing industrial use is not seen as appropriate. However, a rezoning rather than a SCC is considered more appropriate.
Parramatta and District Historical Society	Potential visual impacts of the development on the Hambledon cottage and the parkland setting, which will dominate the background. Concerns about the interface between Hambledon cottage and the new development, particularly the need for a maintained fence to ensure security and safety. Vehicular access concerns, including consideration of signalised intersection at Gregory Place and Hassall Street. Need to ensure coach parking availability is protected to Hambledon cottage for adult and school trips. Concerns related to construction impacts including demolition impacts and construction of new buildings. Asbestos contamination was also raised as a concern, and the potential disturbance during construction. Potential financial implications to the operation of Hambledon cottage if activities were to be halted during the construction phase.
National Trust	The primary concern of the National Trust was in relation to the setting of “<i>three of the most important historic places in Australia</i>”. The National Trust acknowledges the existing factory is not a heritage items and detrimentally impacts the setting of Hambledon cottage.

Stakeholder	Key Comments
	General concerns that the new development will destroy the setting of Hambledon cottage and its @blue sky@ background, and does not consider the broader setting of Experiment Farm and Elizabeth Farm. Need for further consultation and engagement with key stakeholders, including the owners/mangers if the heritage items. Need for further analysis and consideration of the impact of the development on views. The view analysis needs to be more comprehensive. Concerns in relation to the relationship between the development and Clay Cliff Creek, and the importance of the “<i>key historic watercourse</i>” as part of the overall development and noting the indigenous and colonial role the watercourse has played. Concerns in relation to potential archaeological remnants and relics and the need for further assessment to further understand whether remnant archaeological features exist. Concerns about compliance with the Parramatta DCP. General concerns about the findings of the Statement of Heritage Impact.
National Trust (Parramatta Regional Branch)	Concerns in relation to the validity of the SCC to permit residential flat buildings in this location. That the visual impact is misrepresented by the Visual Impact Assessment. The Harris Park area is mostly of a low-rise character and the proposal will change this character. Concerns that the proposal will destroy the setting of Hambledon Cottage, and the proposal will significantly impact the settings of Experiment Farm and Elizabeth Farm. Concerns in relation to the westward expansion of the development footprints and the potential impacts to the Experiment Farm setting and its landscape connection to Hambledon cottage.

Over 100 public submissions were made during the exhibition, both in letter form and messages via the DPE website. A wide range of matters were raised, with not all relevant to the application. However, there were many similar themes related to certain issues. Therefore, public submissions have been addressed and responded to as themes, rather than addressing every matter raised. The themes are addressed under section 8 of this report, and are as follows:

- Theme 1 – The proposed buildings are too high
- Theme 2 – The proposed buildings are too bulky and of an inappropriate scale
- Theme 3 – There is insufficient setbacks from all boundaries, increasing the heritage impact to Hambledon cottage and its setting, Experiment Farm and its setting, and the Clay Cliff Creek
- Theme 4 – The development will result in too many people in the area, creating safety concerns
- Theme 5 - the development will result in too many new cars in the surrounding streets which are already constrained by attendees to OLOLC and the Maronite College of the Holy Family (MCHF)
- Theme 6 – The development will result in insufficient parking in the area
- Theme 7 – There is too much on site parking within the development
- Theme 8 – The proposal is incompatible with its context
- Theme 9 – The proposal has a large impact on and is inconsistent with the heritage context and the setting of the three cottages
- Theme 10 – Cottage blue sky background is impacted by the proposal

- Theme 11 – Heritage trees in the reserve are not adequately considered, nor their connection between cottages
- Theme 12 – Aboriginal archaeology is not adequately considered
- Theme 13 – The application has not adequately considered the retention of trees on the site
- Theme 14 – The proposal does not provide for the interpretation of the significant heritage of the precinct
- Theme 15 – The proposal does not consider the views into and out from OLOLC, including the importance of OLOLC on the skyline and the current openness
- Theme 16 – The ground plane has not been adequately considered, including the extent of deep soil
- Theme 17 – First Nation design principles and integration haven't been adequately considered
- Theme 18 – The development does not adequately consider the impacts of flooding on the area and doesn't give consideration to OSD and WSUD requirements and impacts
- Theme 19 – The proposed buildings lack appropriate amenity
- Theme 20 – The proposal will cause conflict with OLOLC
- Theme 21 – The proposal will impact on OLOLC's redevelopment potential
- Theme 22 – The location is not appropriate for affordable housing
- Theme 23 – There is a high vacancy rate of apartments in the area
- Theme 24 – The consultation process was inadequate
- Theme 25 – Concerns were raised in relation to overshadowing; OLOLC, the childcare centre, heritage items, adjoining reserve and the channel walk
- Theme 26 – Concerns were raised about the VIA not adequately showing views around and from OLOLC, the cottages and the heritage view corridors
- Theme 27 – Concerns relating to construction impacts
- Theme 28 – Concerns relating to staging the development
- Theme 29 – Concerns relating to the proposed development's noise generation
- Theme 30 – Concerns have been raised relating to neighbourhood privacy being impacted by the height of the development and number of residences
- Theme 31 – Requests that Clay Cliff Creek be correctly located, interpreted, and the current channel remediated and reinstated as a natural water course
- Theme 32 – Concerns were raised that demolition would result in the area being exposed to contaminated materials
- Theme 33 – Does not comply with Parramatta planning controls
- Theme 34 – The clause 4.6 request does not appropriately address the height increase. Percentage increase description to be the percentage of limit not percentage of proposal

- Theme 35 – Site Compatibility Certificate does not confer a height increase
- Theme 36 – The Site Compatibility Certificate is no longer valid
- Theme 37 – The site should be in public ownership and converted to a park
- Theme 38 – Concerns relating to impacts on Our Lady Aged Care (OLACC) residents
- Theme 39 – The proposal will generate an increased demand for recreation spaces
- Theme 40 – The proposal will generate an increased demand for services
- Theme 41 – The proposal will lead to the destruction of cultural values
- Theme 42 – The proposal will lead to the destruction of social values
- Theme 43 – The proposal will lead to the destruction of ecological values
- Theme 44 – No consideration has been given to the proposal’s location within an area of National heritage significance
- Theme 45 – The development will impact on the cultural and tourism potential of the listed cottages and should elevate the tourism significance
- Theme 46 – Current industrial factories do not impact the surrounding area
- Theme 47 – The removal of existing industrial on the site is supported
- Theme 48 – The site is a good location for factories for jobs
- Theme 49 – Support of residential use over industrial use
- Theme 50 – Alternative development not adequately considered
- Theme 51 – Proposal is overdevelopment
- Theme 52 – The development is illegal
- Theme 53 – Build-to-rent is virtue signalling
- Theme 54 – The proposal does not benefit the local community

5 Summary of changes

As discussed under 1.2 updated Project Narrative, a new evidence-based approach to the project has been adopted with a new co-design methodology that responds to the submissions within the site’s culturally significant setting and pre-colonial landscape.

The project has adopted a new lead design architect for the project with a new set of objectives to guide the design and urban proposition for the site informed by feedback from key stakeholders and the community, as identified and summarised in the previous chapter. Those objectives, highlighted by Tzannes and Yerrabingin through a co-design framework in the attached design report at Appendix A, that informed the response to submissions include:

1. Integrate ‘Country’ in a co-design process to deliver community infrastructure guided by best practice planning and design.

2. Revitalisation of blighted area and establish an acceptable future urban character.
3. Create a new destination of enhanced cultural significance and a high standard of publicly accessible amenity.
4. Enhance appreciation, visitation and access to existing heritage and community facilities.
5. Enhance park access and amenity throughout the entire precinct.
6. Align with the distinctive characteristics of new developments and heritage in Parramatta.
7. Manage urban growth and infrastructure aligned with sustainable principles.
8. Provide affordable housing of high quality design, construction and amenity in the Parramatta area.
9. Creating a socially inclusive environment that fosters long-term residency and community connections.
10. Create a viable, affordable housing development.
11. Holistic consideration and responsiveness to community concerns.
12. Enhance the ecological value of the site by connecting extensive green spaces and natural elements.

The evidence-based design process established a new set of design guidelines, which are outlined under Section 8 of the attached design report. These design guidelines provide controls to establish footprints, open space, envelopes, setbacks, character statements, and specifically define heights through solar access planes. The methodology for the updated and revised controls is guided by compatibility, as discussed under Section 3 of this report.

As a result of this process, a number of changes have been made to the 2022 exhibited scheme. The overall building footprints and therefore floorspace have been reduced, resulting in the reduction of indicative apartments from 483 to 320, which therefore also results in the reduction in the number of affordable apartments to be included within the development. A comparison of the 2022 concept design with the 2025 concept design is illustrated below and includes the following key features:

- New pedestrian and cycle connections across the channel with improved walking experience alongside the channel.
- Integrated park precinct on both sides of the channel.
- Heavily landscaped cul-de-sac shared way to provide an address to all buildings and enhance the setting to Hambledon Cottage and Experiment Farm.
- Appropriate landscape views and vistas for heritage items and OLOLC.
- New connections between Experiment Farm, Hambledon Cottage, OLOLC and nearby neighbourhoods.
- Appropriate setbacks of built form.
- Varied and appropriately scaled built form across the site with reduced height along North and West boundary at the interface with Hambledon Cottage and Experiment Farm, and lower built form adjacent to OLOLC; and
- Less affordable housing.



Figure 16 2022 Concept footprints

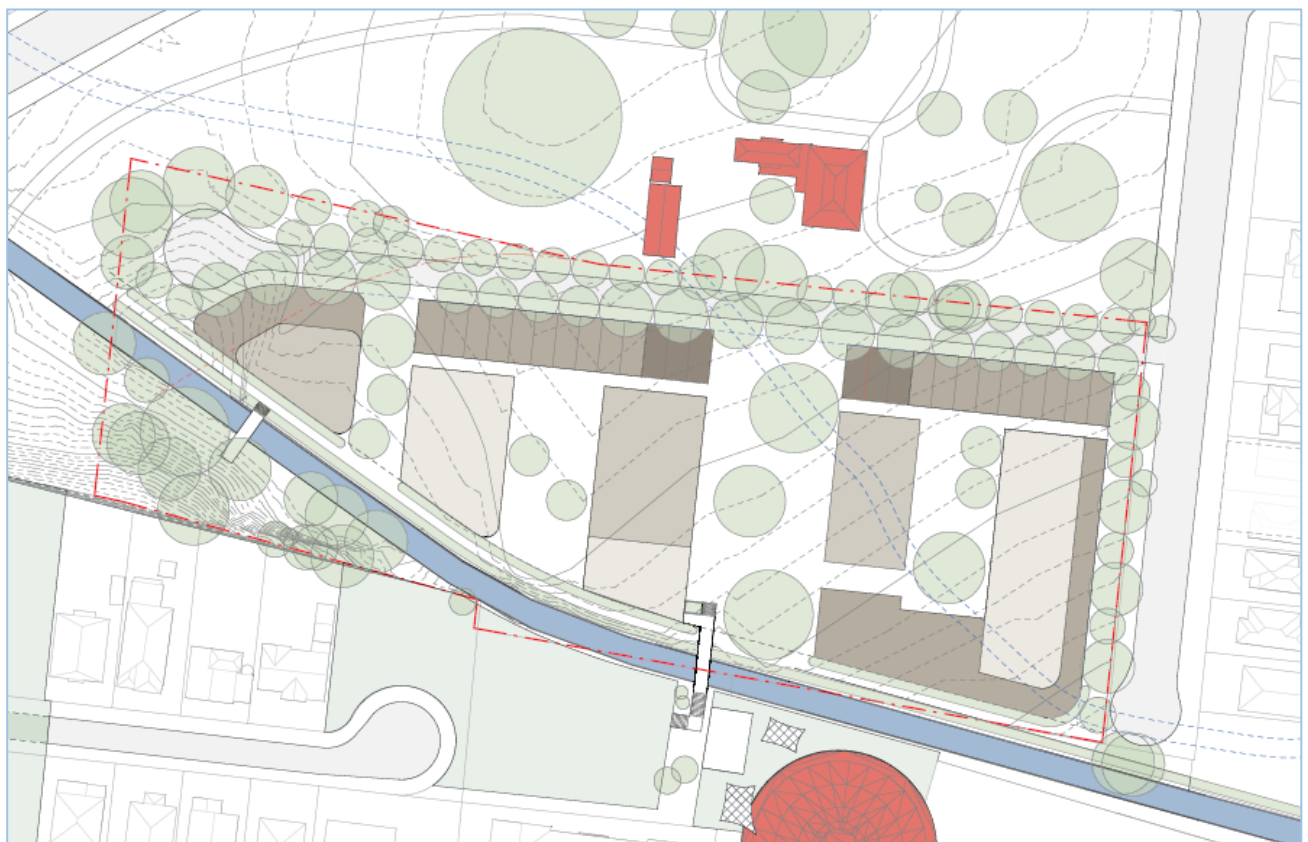


Figure 17 2025 Concept footprints



Figure 18 2022 Elevation and massing



Figure 19 2025 Elevation and Massing

The following table provides a breakdown of the quantitative changes as a result of the design outcome proposed by this response to submissions report:

Table 12 Summary of changes

	2022 Original Lodgement	updated
Dwellings	483 186 x 1 bed (38.5%)	320

	2022 Original Lodgement	updated
	258 x 2 bed (53.4%) 39 x 3 bed (8.1%)	
Affordable	242 (50%)	160 (50%)
Retail (sq.m)	0	141m ²
GFA	48,685m ²	31,073m ²
FSR	2.5:1	1.59:1
%age achieves 2 hrs mid-winter	70.40% (340 of 483)	77%
%age naturally cross ventilated	60.5% (292/483)	63%
Height	27.9 metres	29 metres
Setbacks:		
Gregory Place	4.6 metres	6 metres
Clay Cliff Channel	Variable	Variable, however less built form, and more breaks
Hambledon Cottage	9.5/10 metres	12 metres
Experiment Farm Reserve	5.1 metres	17.5 metres
Distance between Buildings A and B	Part 18 metres/part 24 metres	30 metres
Landscaped area	-	12,491.2m ²
Landscape %age	-	64.1%
Landscape on ground	-	8,908.7
Ground %age	52.4%	45.7%
Deep Soil	5,700m ²	6,036.4m ²
Deep Soil %age	29.3%	31%
Basement levels	2	2
Parking Spaces	634 566 residential spaces 68 visitors	359 272 residential spaces 87 visitor and retail

5.1 Details of key changes to 2022 scheme

5.1.1 Connecting with Country

Some criticism was received in relation to a perception that the design did not respond to a Connecting with Country design framework. To address this, a new co-design process has been developed that has informed the built form and landscape design methodology.

This process involved interpreting distinctive site attributes, and subsequently three built form zones created to reflect their distinct identities shaped by their setting. This included:

1. **Gregory Place:** Residential medium density housing that reinforces the geometry of Gregory Place and medium density housing in the areas to the east and south.
2. **Community Hub:** Active heart of the development, located along the key axis between OLOLC and Hambledon Cottage.
3. **Parkland Setting:** Establishing strong green links between open spaces of Hambledon Cottage reserve, Experiment Farm reserve, James Ruse Reserve, Robin Thomas Reserve and Queens Wharf Park, and reinforces the geometry of the park

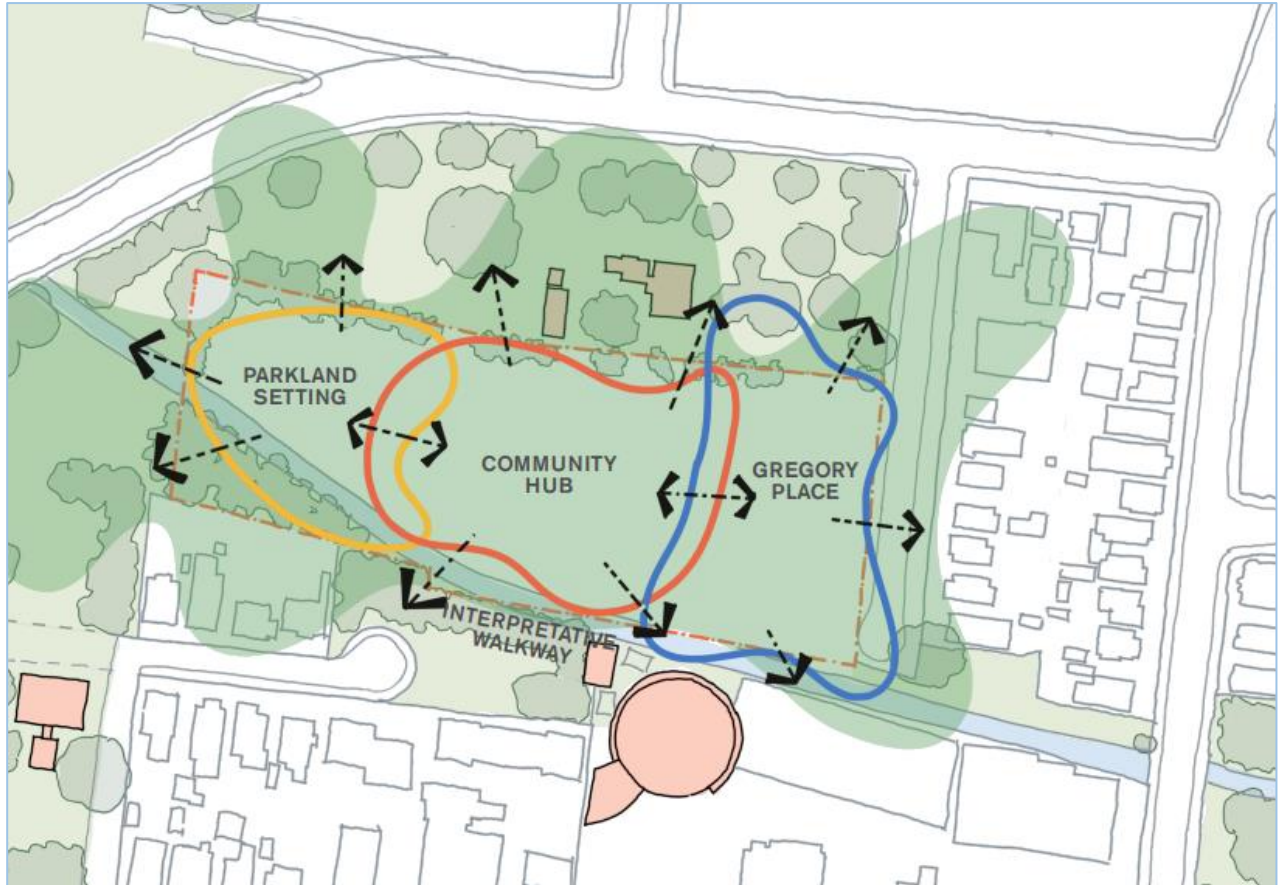


Figure 20 Interpreting Distinctive Site Attributes

This process laid the foundations and the framework for the changes discussed below to ensure that the design and landscape enriches the setting, complementing colonial with pre-colonial and contemporary multi-cultural interpretations. This story telling will form part of the detailed design stage.

5.1.2 Overall building heights

Considerations of height across the scheme have been reconsidered and redefined by solar access planes and overshadowing criteria, which has resulted in a new varied built form.

The 2022 scheme was dominated by a maximum 8 storey building form, with some transitioning of 4, 5 and 6 storeys around the edges. The heights and building footprints have however been revised to respond to the defined solar access protection surfaces, as identified by Section 5.2 of the attached design report at Appendix A.

The solar access protection surfaces demonstrate that the revised heights ensure:

- No additional overshadowing on 21 June to Experiment Farm between 10am and 2pm, and
- A minimum of 2 hours of solar access between 8am and 4pm during winter months, for not less than 30% (or 2.1m²) of the 7m² of outdoor space per child required (Note: According to ACECQA, this childcare centre has 75 approved places, requiring a minimum of 2 hours of solar access for at least 158m² of outdoor space).

Further, notwithstanding the solar access protection zones, the heights have also been modified in order to respect the surrounding context, to preserve privacy and create diversity in built form.

The built form is now varied across the site, with heights reduced along the northern boundary from 6 storeys, to part 4 and part 2 storeys, and heights reduced at the western boundary from part 7 and part 8 storeys to part 4 and part 6 storeys, in a reduced footprint at an increased setback. Heights immediately adjacent to the channel walk and OLOL Co-Cathedral have also been reduced from 5 and 7 storeys to 4 storeys.

Previously, it was raised that the building heights led to a perception of bulk and scale crowding the setting. The updates have improved the backdrop and relationship of the site and development to Hambledon Cottage, increased the connection between the OLOL Co-Cathedral and Hambledon cottage and improved the relationship with Experiment Farm Reserve. Refer to a comparison overlay of overall height adjustments below.



Figure 21 Refined built form

5.1.3 Southern boundary interface

The southern interface has been revised as part of a process that has involved a re-imagined channel walk, a review of the built form interface with the OLOL Co-Cathedral and connectivity within a landscape setting.

The first revision was in relation to the built form at the interface with OLOL Co-Cathedral. The building heights here have been reduced from 7 and 8 storeys to 4 storeys, to ensure solar access and privacy to the Co-Cathedral and associated child care facilities.

Secondly, the connection between Hambledon Cottage and the OLOL Co-Cathedral has been widened from 18 metres to 30 metres. This unobstructed landscape view corridor from Hambledon Cottage to OLOL Co-Cathedral, visually connecting Early European settlement to the history of migration and multi-cultural society. With a First Nations designed landscape, it also reflects the pre-colonial context.

Combined, these revisions significantly improve the outlook from the balcony of OLOLC, while providing a clear visual connection to Hambledon Cottage when viewed from Hassall Street.

Overall, a variety of setbacks have been introduced ranging from 6 metres to 45 metres in response to the immediate context, in order to enhance the pedestrian experience. The experience generated by the expansion and contraction of space in the updated built form design creates a walk that is rich in experiences, moments and nodal points that engage with the whole of the site. Refer ‘Introducing a channel walk’ page in section 5.2 Public Domain Strategies of the attached design report at Appendix A. Section 6.1 of the attached design report also provides considerations of the experiences of users of the open spaces and landscape setting (“Day in the Life” key uses).

5.1.4 Northern boundary interface

It is acknowledged that the northern interface is particularly sensitive due to the location of Hambledon Cottage, which is set within a landscape context.

The built form interface to the south of the Cottage has been reimagined, and heights and built form modified, setbacks increased, and the design ensuring that the development will integrate within a landscape rich in colonial and pre-colonial history.

The setback along the northern interface has been increased to a minimum of 12 metres, providing a shared way that ensures a dominant landscape setting for Hambledon Cottage, separating park uses from the principle on grade address of the new residential neighbourhood. This shared way has been extended across the entire northern interface. This will be lined with vegetation, including large canopy trees and sufficient landscape buffer zones at various heights.

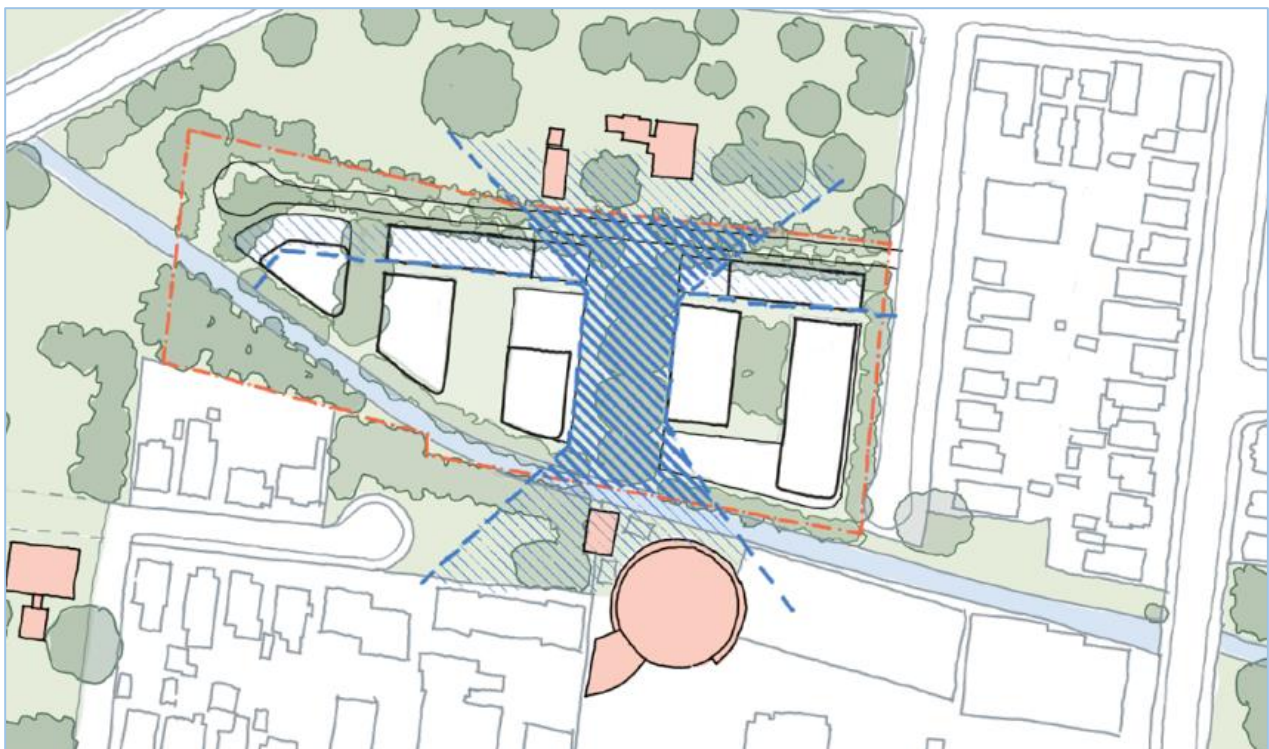


Figure 22 Proposed green spine

The built form will step down adjoining Hambledon Cottage, with no built form directly behind Hambledon Cottage, to achieve a respectful built form relationship and enhance the prominence of this key heritage item, noting that the updated Statement of Heritage Impact has identified that the original front façade of Hambledon Cottage was its eastern façade, facing back towards Elizabeth Farm Cottage. Previous heights included 4 to 6 storeys behind Hambledon Cottage, and these have been reduced to 2 to 4 storeys, with a change in built form, and new pedestrian links and connections.

The footprints have also been modified as part of a rethought heritage curtilage interface, creating an unobstructed landscape view corridor from Hambledon Cottage to OLOL Co-Cathedral.

5.1.5 Building C – Western interface

The building on the western boundary has been moved further away from the boundary, and its height has been reduced, represented in Figure 23. This change reduces the perception of building bulk along the western boundary, limiting vision in most locations to below the tree canopy line. The building on the western boundary is 4 storeys with a 6 storey portion set back, and is approximately setback 17 metres

from the boundary, but up to 59 metres from Parkes Street, reinforcing the landscaped setting. Previously, Building C was an 8 storey building, with a small 7 storey component. The footprint was significantly larger and only setback 5 metres from the western boundary.

The change has substantially pulled the western building away from the western boundary. The proposed building steps down in height to transition to the reserve and further increase the separation to Experiment Farm Cottage. Further, the shared way has been extended for the length of the northern interface which has increased the setback to the northern boundary, and increased deep soil for the existing and proposed mature trees.



Figure 23 Western interface refinement

5.1.6 Building A – Gregory Place interface

The setbacks and heights along Gregory Place, the eastern boundary have been modified to further improve the relationship and pedestrian scale along this interface. The re-analysing of Gregory Place has involved consideration of the existing and evolving future character, which is expected to reflect the ongoing transformation of Gregory Place, positioning it as a walkable residential precinct that supports a variety of housing types and built forms.

Together, the design strategies ensure that the proposal responds to Gregory Place through articulation, scale, and landscape integration—supporting a cohesive and visually balanced Gregory Place. The proposed built form, ranging from two to eight storeys, aligns with the evolving context and supports a gradual visual transition in height towards the southern cul-de-sac.

The design adopts the relatively consistent front setback along the eastern side of the street, with a new 6 metre landscape setback along the length of the frontage, reinforcing the established rhythm of the streetscape. Generous landscaping and large canopy trees are introduced to soften the built form and reduce the perceived height, enhancing visual amenity and contributing to a more human-scaled environment.

Further, to reflect the finer grain of Gregory Place east, where individual driveways and landscaped frontages characterise the streetscape, the proposal introduces individual ground-floor apartment entries. This approach supports a more human-scaled interface and enhances street activation.

The following changes in height and setback have been introduced to the Gregory Place interface:

- Lower level setbacks have been increased from 5.5 metres to 6 metres. Horizontal articulation will define the first two storeys, referencing the prevailing lower scale along Gregory Place east.
- The maximum height is 8 storeys, with upper levels setback 9 metres, from 7.5 metres.

- Introduction of horizontal and vertical articulation strategies will ensure compatibility with the surrounding built form and streetscape.

Refer to Section 2.3.3 of the attached design report that considers compatibility and the desired future character of Gregory Place, and the design strategies that seek to enhance the street's spatial hierarchy.

5.1.7 Clay Cliff stormwater channel walk

The research by the consultant team has identified that Clay Cliff Creek was originally a chain of ephemeral ponds. Channelisation was undertaken by the colonists to control the water flow. Regardless, the project team has embraced the channel and its permeability opportunities.

The channel walk offers an exciting future opportunity to reimagine engagement with Clay Cliff Creek storm water channel, creating a space for meaningful connection with the waterway. Envisioned with interpretive elements that will tell the story of the chain of ponds and their importance to the local ecosystem, the walk will inspire visitors to learn about and appreciate the site's natural history. Planned vegetated edges and biofiltration zones aim to enhance water quality and provide habitats, while proposed boardwalks and viewing platforms promise immersive experiences, fostering a deeper connection to Water Country.

The Channel walk has been re-imagined ensuring a better experience for users and pedestrians informed by a strategy to further improve the connectivity with Country. Underpinning the new vision for the Channel walk are the following principles:

- **Safety:** A landscaped channel walk is designed with surveillance from adjacent residential areas.
- **Neighbouring green spaces:** Amenity is enhanced from adjacent green spaces and landscaped zones on both sides of the walk.
- **Diverse setbacks:** The varied setbacks along the channel walk enrich the spatial experiences, creating a dynamic and engaging environment that enhances the overall ambiance of the area.
- **Varied height:** Present varied building height along Channel Walk for a more dynamic experience.

Critically, the updates to the concept have created a variety of heights and revised built forms along the corridor, which seeks to facilitate additional solar access to the walk, with additional and larger breaks in built form, and more open green spaces. The walk along the creek that connects Experiment Farm to Elizabeth farm will be characterised by a variety of setbacks, ranging from 6 metres to 45 metres in response to the immediate context. The experience generated by the expansion and contraction of the built form, both existing and proposed, creates a channel walk that is rich in experiences, moments and nodal points that engage with the whole of the site. It means that the narrowest width can remain at 6 metres allowing numerous large public and private open spaces.

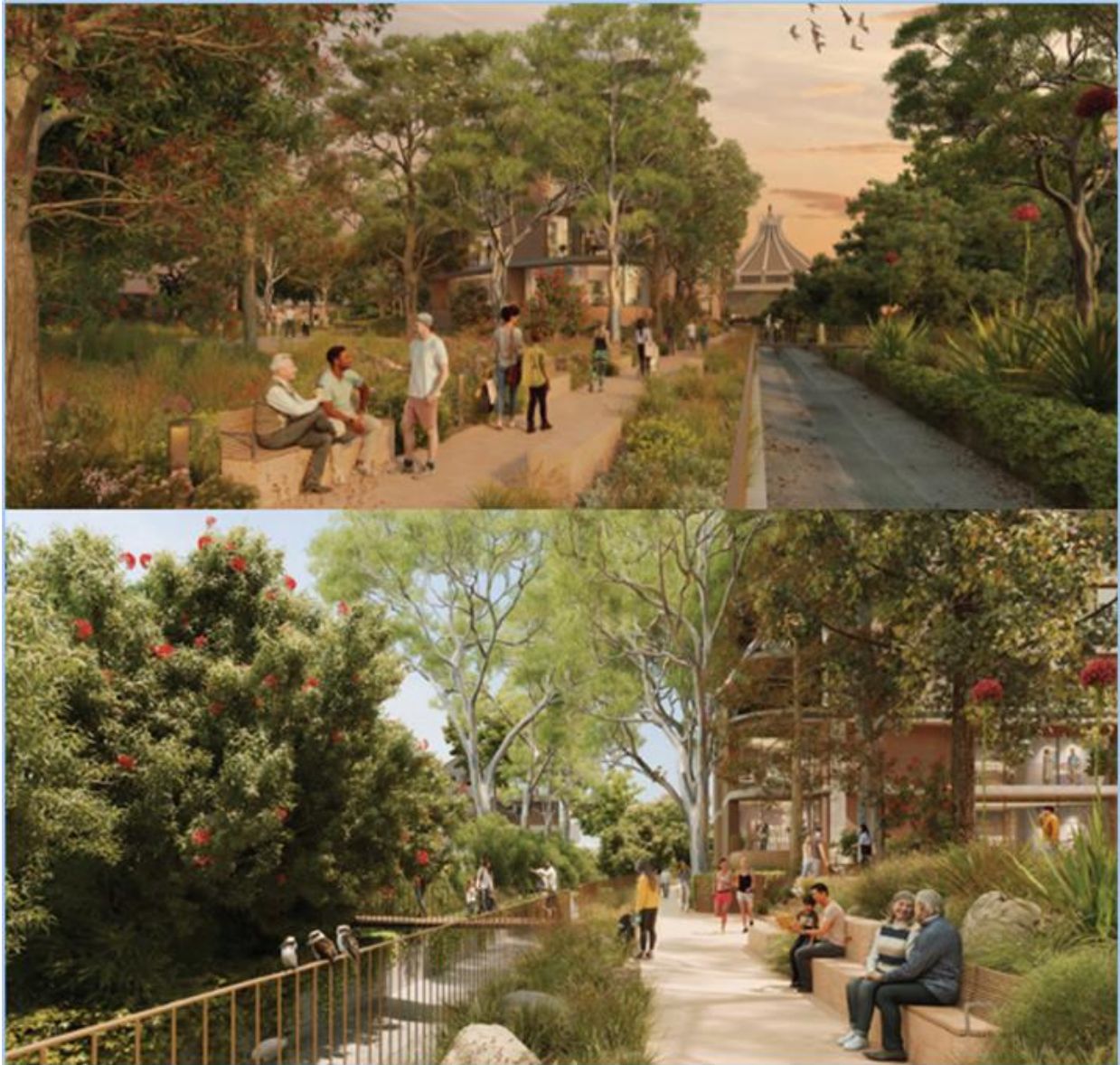


Figure 24 Channel walk representation from design report

The landscape strategy that has informed the new design, is outlined in the attached design report, and includes the following key considerations:

- Activate the Clay Cliff Channel edge with Storytelling and interpretation along the walkway
- Connect into the wider context that follows the channel
- Use specific water cleansing species along the edge of the channel to improve run off water quality
- Incorporate colours and textures from Country
- Use non-human kin sensitive lighting
- Provide tree canopy coverage and seating for a cool and comfortable space.

6 Engagement

The EIS was publicly exhibited by the Department of Planning, Housing and Infrastructure from Tuesday 2 August 2022 to Monday 29 August 2022. Seven submissions were received from public authorities, and one submission was received from the council.

Further, over 100 public submissions (including multiple duplicate letters and petitions) were received from organisations and key stakeholders including, but not limited to, the Parramatta and District Historical Society, the National Trust and the Trustees of the Roman Catholic Church for the Diocese of Saint Maron.

A number of submissions raised concerns that they had not been consulted or that the engagement process was inadequate for a project that they felt impacted by. This section therefore explores the additional engagement, aside from that as part of the formal exhibition process, including feedback associated with the original 2022 scheme and the scheme with the revisions associated with the response to submissions 2025 scheme.

6.1 Engagement background

There has been significant community and stakeholder engagement on the proposed plans for 2A Gregory Place in Harris Park. The two key engagement periods were:

1. 2022 engagement: seeking community input and assessing social impacts and benefits on the pre-EIS lodgement for the SSDA Concept DA and was conducted between 25 April and 15 June 2022
2. updated Concept plan engagement: seeking input and assessing social impacts on the updated Concept plan and was conducted between February 2023 and September 2025.

The engagement methodology across both periods was undertaken in accordance with the NSW Government's *Undertaking Engagement Guidelines for State Significant Projects*.

6.2 2022 engagement: pre-EIS lodgement methodology and key findings

To seek stakeholder input into the EIS Concept DA submission, community and stakeholder engagement was undertaken by between 25 April and 15 June 2022 and comprised:

- Stakeholder meetings and interviews with key agencies and those who will be impacted.
- Indigenous engagement with key community groups including 4 meetings and 4 interviews, and a session facilitated by an Indigenous expert consultant with 20 attendees.
- Letterbox drop of information pack including feedback options to 1,511 local residents and businesses.
- Community survey (7 completed) and associated web page.
- Direct avenues to connect with the project team through a dedicated phonenumber and email.

As engagement was occurring at the Concept DA stage, the discussions with key stakeholders and the community were at a relatively high level, broadly exploring the site and the opportunities/ constraints to the future redevelopment. Following were the findings:

- There was agreement across all engagement participants that the site is of strategic importance and presents unique opportunities for redevelopment and renewal. Its proximity to Parramatta CBD, its location on the new Parramatta Light Rail, and its vicinity to state significant heritage items were cited by many participants.
- History and heritage (including Aboriginal and Colonial history) are highly valued by the community, and it is important for development on the site to respect and enhance these values.
- There was general support from most engagement participants for the site's redevelopment, and many indicated support for the Concept DA on the proviso that potential impacts such as traffic, parking and overshadowing are managed.
- A small number of community members who live close to the site were concerned about the proposal in particular:
 - Height and density of the proposal
 - The increase in traffic to the local area
 - Potential impacts on adjoining Co-Cathedral and Hambledon Cottage
- Key agencies including the Department of Planning and Environment and the council emphasised the importance of accessible pedestrian connections through the site, and the opportunity the proposal provided to "open up" and "re-connect" the site to the surrounding local area.
- The Department of Planning and Environment emphasised the importance of providing community benefit provisions through each stage of the proposal and not all at the end of the project. They also emphasised that the distribution and quality of common places (e.g. work from, home spaces, prayer spaces or gyms) will be important. These should ideally reflect the types of people likely to live there.
- Most engagement participants were supportive and positive about the open space, landscaping and place making opportunities the proposal presented, particularly the Clay Cliff Creek Channel walk. There was a desire for these spaces to be of high quality and useable.
- There was general support for the affordable housing and BTR component of the proposal. Several key stakeholders acknowledged the need for affordable housing in the Parramatta LGA, on the proviso that it is a high-quality living environment, well managed and a suitable density.
- A couple of stakeholders, including the council cited that there is currently pressure on parks, open space and recreational facilities in the LGA, and that where possible, the proposal could look to address some of these shortfalls, or at the least take the pressure off the current provision by providing adequate on-site facilities.

The EIS was exhibited by the Department of Planning, Housing and Infrastructure from 2-29 August 2022 and attracted 104 submissions (including multiple duplicate letters and petitions) commenting on the proposal across the following broad themes:

- The perceived incongruity with the surrounding natural and built landscapes including:
 - Potential adverse impacts on the heritage assets located close to the site (Hambledon Cottage, Experiment Farm and Elizabeth Farm)
 - Need for clearer connection between the design and Connecting with Country urban design methodology

- The height and scale of the built form, and perceptions of overdevelopment of the site
- Social amenity impacts on the local community, including traffic and parking impacts.

There was expressed concern about the level of consultation. As noted in the methodology above, the reach of communication through the letterbox drop was 1,511 residents and businesses. The information provided directly to the surrounding area about the proposal was comprehensive. This information also provided details on opportunities for feedback including the survey and phone and email contacts.

Notwithstanding the low participation rate in the engagement program, this phase produced findings that have been instrumental in the development of the updated Concept Plan.

6.3 Updated concept plan engagement: methodology and key findings

Following feedback from stakeholders and the community during the 2022 engagement, consideration of the submissions and extensive additional engagement, the proponent updated the Concept Plan with a reconstituted consultant team.

The methodology for the engagement to seek input on the updated Concept Plan built on the 2022 engagement approach and comprised:

- invitations to face-to-face briefings and site visits to stakeholder and interest groups (9)
- a comprehensive project website including updated Concept Plan details, responses to key themes raised on the EIS Concept Plan, historical and projected timeline, FAQs, and engagement options (see 2agregoryplace.com.au)
- a survey (online and hardcopy, 22 completions)
- online information sessions (3) for community members (8)
- a letterbox drop to surrounding residents and businesses (1,437) alerting them to the website and opportunities to provide feedback and
- electronic direct mail to stakeholders advising them about the website and the consultation period.

Community and stakeholder participants in the engagement on the updated Concept Plan welcomed the response to issues raised during the 2022 Engagement and acknowledged that significant changes had been made to address these issues.

The dominant themes that were raised or queried related to:

1. European and Indigenous heritage (in particular, potential adverse impacts on Hambledon Cottage)
2. Access to open, green space (in particular, an appreciation of the land set aside for this purpose in the updated Concept Plan) and
3. Traffic and parking management.

The following provides greater details on the community's views heard through online engagement.

Table 13 Engagement on the updated concept plan

Issues / queries	Responses
Clarity around the Build-to-Rent (BTR) model	A community housing provider will manage the whole site, including the Affordable Housing units. Ongoing engagement with residents and a

Issues / queries	Responses
	residents' committee will inform and support effective site management. The BTR lease is required to be in place for a minimum of 15 years. The proponent aims to maintain the BTR model for longer than is required.
Visual impacts of Hambledon Cottage from Hassell Street	Landscaping with advanced shrubbery provide a green screen between the site and the cottage and softens the visual appearance of buildings. The setbacks have also been increased along this boundary. This has been assessed as part of the visual impact assessment for the site. The Visual impact Assessment and the updated Statement of Heritage Impact have identified that the original entry to Hambledon Cottage was from the eastern verandah, therefore the subject site, which was on the site of the original Neals Cottage, is the side neighbour, not the rear neighbour. Of note, the Assessment Committee of Heritage Council of NSW has stated its support of the proposed current scheme with a maximum of 2-storey heights for buildings in the immediate vicinity of the Hambledon Cottage. See table 14 for more detail.
Security for Hambledon Cottage	A fence will remain between the site and Hambledon Cottage and it will be hidden within shrubbery to provide a visual connection.
Parking	More parking is being provided than required by the planning authority. One car space is being provided per apartment plus one visitor space for every five apartments.
Traffic, including narrowness of Gregory Place and Hassall Street intersection	Gregory Place is no narrower than other streets in area. It has four lanes (including curbside parking lanes). It has previously serviced large trucks when 2A Gregory Place was an active industrial site since the 1950s. Traffic modelling of the Hassall Street intersection at peak times conducted for the EIS SSD Concept DA (with more dwellings) was accepted by TfNSW.
Building heights including incongruity with the area, impacts of those facing Gregory Place, and inconsistency with the City of Parramatta LEP	There are a variety of building heights in the area including the aged care facility of six storeys, the Co-Cathedral's community centre is equivalent to eight storeys, Alice Street apartments which are the equivalent of 12 storeys from Gregory Place. The proponent has undertaken an extensive review of height impacts since the 2022 EIS submission. Prior to lodgement of the EIS, the proponent worked for many years, from 2018 to early 2021 with the Heritage Council of NSW and their Approval Committee which resulted in their supporting the progression of the scheme which at that stage was up to eight storeys, to Stage 1 Development Application (now known as a Concept Application). In terms of buildings fronting Gregory Place, the building heights and the setbacks vary. At the northern end, the building height is 4 storeys. A laneway is proposed, then the building height continues at 8 storeys with the first 4 storeys setback at 6m, then a 3 metre set back then another 4 storeys. The setbacks provide the lower storeys to be designed similarly to townhouses with courtyards where mature trees will be planted. The 2017 SCC allows for an assessment on merit, notwithstanding the underlying land use controls, noting that the provision of residential flat buildings is compatible with the future planning for the site. It is noted that the scheme presented to the (then) Department of Planning & Environment

Issues / queries	Responses
	for their consideration of the SCC application was 35 storeys in height.
Fewer units overall resulting in less affordable housing	The scheme has had to reduce the number of dwellings. While 50% affordable housing has been maintained, there are less dwellings for families in need. Some participants expressed disappointment that the project design had reduced the number of affordable housing options given the crisis the community is facing.
Flooding risk	Parramatta CBD is flood prone. The proposal complies with council's adopted 2024 Parramatta River Flood Study and flood management provisions including the preparation of a flood emergency response plan.

In the survey, participants were asked to rank in order of importance six issues that the 2A Gregory Place proposal is aiming to address. The issues and their rankings are as follows:

1. Access to parks and other green spaces
2. Affordable housing
3. Recognition of Indigenous heritage and history
4. Access to services such as public transport, schools, medical services and shops
5. Cost of living
6. Urban areas that are safe.

In terms of changes to the proposal, the top three responses rated as somewhat or very important were: increased pedestrian and cycle networks (n=15), increased landscaping (n=13) and traffic management (n=11). The lowest rated response for importance was clearer view corridors (n=7).

Also in the survey, 10 respondents supported the proposal, eight of which were unconditional. Five respondents opposed the proposal.

An important part of the engagement on the updated Concept Plan was the proponent inviting representatives of key community interests to individual briefings about the updated Concept Plan, and the response to the concerns raised in their submissions.

The outcomes of these invitations and engagement (where they were able to occur) follows.

Table 14 Stakeholder engagement on the updated concept plan

Stakeholder	Issues
Heritage Council of NSW and their Approvals Committee	The Heritage Council of NSW lodged a submission objecting to the SSD Concept DA (2022). This was a surprise to the proponent. Following extensive engagement at that time, the Heritage Council had indicated that they would support the scheme. The proponent sought to meet with them to brief them on updates to the EIS Concept Plan. The proponent prepared amended documentation to address the Heritage Council's concerns raised in the 2022 submission. This was submitted with a request to meet and present in early 2023. The request to meet was denied and the material was considered in absentia. Written advice from the Heritage Council advised they had visited the site on 4 April and considered the additional material at their meeting of the 3 May 2023. No further information was provided. A meeting with Heritage NSW staff was organised by DPE and held on the 4 May 2023. Written advice dated 12 May 2023 was provided.

Stakeholder	Issues
	Subsequently, the proponent engaged a new project team to reconsider the design proposition, which lead to the updated concept plan. The project team presented this updated Concept Plan to the Heritage Council of NSW Approvals Committee on 30 September 2025. The minutes from the meeting state that the Committee resolved to support the proposed current scheme with a maximum of 2-storey heights for buildings in the immediate vicinity of the Hambledon Cottage. Additional resolutions included: - Note that the current scheme has responded to a number of concerns previously raised by the Approvals Committee and potential impacts on the context, setting and visual connections between Hambledon Cottage, Experiment Farm Cottage, and Our Lady of Lebanon Co-Cathedral have been reduced. - Note the material reduction in massing and scale of the building envelopes as part of the proponent's response to submissions - Support the Connection with Country and landscape design and recommend that it inform the wider public domain. - Support the proposed 30-metre-wide public park connection as a minimum, which will provide a visual link between Hambledon Cottage and Our Lady of Lebanon Co-Cathedral. Support the reduction in Building C's footprint and height from 7–8 storeys to 4–6 storeys.
Parramatta and District Historical Society	A meeting with Parramatta and District Historical Society onsite was held in September 2024. The Society's preference is that the site is converted to parkland. Other issues included security for Hambledon Cottage, traffic and parking, and the visual appearance of the buildings.
National Trust	The proponent invited the National Trust to a briefing and site walk. A meeting was scheduled by the Trust in their offices in August 2024 and the proponent presented the updated concept plan. The proponent further offered an opportunity to workshop the updated Concept Plan with their expert committee. The arrangements were not forthcoming, and after multiple follow-up the Trust advised that the workshop would not be needed.
Sydney Living Museums (now known as the Museums of History NSW)	The proponent met with representatives from Elizabeth Farm (Sydney Living Museums, now known as Museums of Heritage NSW) onsite in September 2024. Their focus was on the view lines from the stables upper floor window, and they noted that it would not be impacted due to the advanced greenery on the property which mostly screens views beyond the property boundary. Beyond the Cottage grounds, the representatives were positive about the following: - the advanced plants in Swann Reserve would screen the view from the reserve to the development - the reduced building heights and increased setbacks would help to reduce the bulk and scale of the development - interruptions of the view line from Hambledon Cottage to the Cathedral would be minimised - the increased connection between Hambledon Cottage and Elizabeth Farm through greater open space and pathways along the creek would be a benefit to the overall heritage precinct - the increased numbers of people living in the area would potentially be of benefit to Elizabeth Farm

Stakeholder	Issues
	the intention to plant advanced screening flora along key view lines would soften the development and its relationship to its surroundings.
City of Parramatta Council	The project's engineering experts, GRC Hydro, met with council counterparts in November 2022 to discuss flood modelling. At this meeting, council ran through their concerns and GRC Hydro presented their methodology. Since this meeting, council has adopted the Parramatta River Flood Study, which the updated Concept Plan addresses.
Federal Member for Parramatta, Dr Andrew Charlton MP	The proponent invited Dr Charlton to an onsite meeting in July 2024, and a meeting was held in the MP's office later that month. Dr Charlton hosts an online petition against the project. The proponent requested a follow up meeting to update Dr Charlton on the community engagement to date. A date was never provided. The proponent emailed Dr Charlton in December alerting him to the project website and the commencement of community consultation. Dr Charlton shared the information with his subscribers noting that the updated Concept Plan was an improvement but that he still held concerns. The petition remains active.
State Member for Parramatta, Donna Davis MP	The proponent invited the State Member for Parramatta to a briefing and site visit in August 2024. There was some back and forth over the ensuing weeks to confirm a time in Ms. Davis' diary. A meeting did not eventuate. The proponent emailed Ms. Davis in December alerting her to the project website and the commencement of community consultation.
Our Lady of Lebanon Co-Cathedral (OLOLC)	The proponent met with Bishop Antoine-Charbel Tarabay, Father Danny Nough (Dean) and Anthony Yacoub (Head of the Stewardship Committee) of the OLOLC in August 2024. The Bishop said he supported increased density on the site, appropriately located. Mr Yacoub expressed concerns about proximity and impact of the residences on the Co-Cathedral. The proponent explained that the design will seek an engineering (rather than management) outcome. The proponent offered to present the scheme to the Stewardship Committee and/or OLOLCs experts, noting that OLOLC identified they were working on a masterplan and had engaged a consultant planner to prepare their submission. The proponent followed up the offer to meet and present but it did not eventuate. The proponent emailed OLOLC in December 2024 alerting them to the project website and the commencement of community consultation.

6.4 Department of Planning and Environment (now DPHI)

The applicant briefed the Department's planning team on the updated Concept Plan in September 2023.

The Concept Plan was refined in consultation with the State Design Review Panel detailed below.

The Applicant and consultant team subsequently met with Paulina Wythes, Director Social and Diverse Housing, and her team on 18 August 2025 to discuss the amended design prior to lodgement. Queries from the Department centred on consultation with Heritage Council of NSW (detailed above), and the SDRP (detailed below). The Department also suggested initiating contact with Sydney Water. The Applicant has since established contact with Sydney Water on the proposal.

The response from the department was that they were keen to see the proposal move forward pending their due diligence of cross checking the updated concept plan with the submissions on the SSD Concept DA (2022).

6.5 State design review panel

Prior to the lodgement of the EIS, two presentations were held with the SDRP. These presentations were held on 9 December 2021 and 25 May 2022. A detailed and comprehensive response table was prepared by the project team and included with the EIS. A number of critical issues were raised through that process and addressed at the time.

As part of the revisions associated with the response to submissions process, a further presentation with the SDRP was held in April 2024.

In advice from the Panel following the presentation, the SDRP confirmed the following elements of the design strategy were supported:

- A robust Connecting with Country approach embedded with First Nations design principles.
- Increased diversity of building typologies, including lower scale buildings fronting Hambledon Cottage and taller buildings fronting communal courtyards.
- Improved layout of public open spaces, with stronger relationships to the local context.
- Improved connection between Experiment Farm Reserve and Hambledon Cottage Reserve through an increased setback to Parkes Street/Hassall Street.
- Increased connectivity across Clay Cliff Creek by introducing pedestrian bridges.
- The intent, subject to assessment, to incorporate non-residential uses on the ground floor to improve the activation of communal and public spaces.

The SDRP noted suggestions for the project including:

- Continuing to work with Yerrabingin to embed the established First Nations design principles into the design
- Strengthening the local water story (Clay Cliff Creek) of Country and celebrate the riparian ecology
- Providing greater detail on the layout and design strategy behind the configuration of the buildings
- Providing greater detail in incorporating sustainability initiatives and mitigating against the adverse impacts from increasing natural hazards.

These have been addressed in the updated Concept Plan.

Detailed consideration of the matters raised is considered under Section 7.3 of this response to Submissions Report and Section 3.5 of the attached design report.

6.6 Concluding comments

Overall, engagement on the updated Concept Plan showed that the scheme has responded to views of stakeholders and the community shared in the 2022 engagement.

The themes related to European and Indigenous heritage, and traffic and parking management are addressed (as far as practicable) through the updated Concept Plan.

In addition, there is support for the community benefits the plan will provide including open space and increased housing (encompassing built-to-rent and affordable housing).

Further details can be found at: 1.4 Appendix W – updated Community and Stakeholder Engagement Report, July 2025 Forward-Thinking.

7 Response to submissions

The EIS was publicly exhibited from Tuesday 2 August 2022 to Monday 29 August 2022. A wide range of issues were raised covering similar themes.

The way that the response to submissions has been structured, is to address the matters in detail raised by the DPE, independent review, agencies, design panels and heritage organisations and then to consider public submissions as themes given the large duplication of matters raised. Refer to Appendix B for the consolidated register of submissions.

7.1 Consideration of issues raised by the department

Two letters were received from DPE dated 7 September 2022 and 21 November 2022 requesting a written response to submissions, response to the department's preliminary assessment and the response to the independent urban design and heritage reviews.

The matters outlined in the department's preliminary assessment are considered below, with supporting documentation attached.

Issue: Height of buildings and Clause 4.6 request

- *The proposed height of buildings and Clause 4.6 request are not supported by the Department in their current form. The scale and height of the concept development are not in keeping with the character of the area. The proposed building height would result in overshadowing of an adjacent childcare centre, potential privacy issues and potential heritage impacts to nearby items. It is requested that the buildings be reduced in height and scale to adequately respond to the constraints of the site.*
- *The Clause 4.6 request implies that the maximum height of buildings could be determined by the conditions of the Site Compatibility Certificate (SCC). The Department is of the view that the SCC confirms permissibly and allows lodgement of a development application. An assessment under Part 4.15 of the EP&A Act, including consideration of any relevant environmental planning instrument, is still required.*
- *The Clause 4.6 request, Environmental Impact Statement (EIS), and other documents incorrectly state that the proposed maximum height of 27.9m is a 67% increase on the 9.2m development standard. The maximum proposed height of 27.9m is 18.7m higher than the development standard, or a 203% increase. This description should be amended in the RtS and a revised Clause 4.6 request submitted.*
- *In accordance with Clause 4.6(3)(a), the request does not clearly demonstrate why compliance with the height of buildings development standard is unreasonable or unnecessary.*
 - *The change in land use from industrial to residential is not sufficient grounds to argue that a compliant height is unacceptable or unreasonable in the site context. The request must include details of why a compliant height would not be viable, and what design/architectural advice has informed the proposed height. The Clause 4.6 request should describe why the proposed*

height is appropriate, and why non-compliant height would support better or equal environmental, social, and economic outcomes as compared to a compliant height.

- *In accordance with Clause 4.6(3)(b), the request does not directly indicate sufficient environmental planning grounds to justify the 203% height increase.*
 - *The current request notes that buildings to the south of the site are at a higher elevation and that single and double storey buildings to the north are at a lower elevation. This statement does not justify why 8 stories are appropriate. The request must include details of how the proposal addresses the heritage, flooding, and urban design constraints of the site. The request should describe any advantages a non-compliant height would have over a compliant height.*
- *The Clause 4.6 request should directly address each of the objectives of the height of buildings development standard within the Parramatta Local Environmental Plan 2011.*
- *The Department is seeking an independent urban design review for the project and may seek additional information or amended plans upon the completion of the review.*

Response

We respectfully acknowledge the Department's concerns regarding the scale of the proposal and its consistency with the character of the area. The proposal has been subject to a thorough and iterative design process to ensure its scale is justified, its impacts are managed, and its benefits demonstrably outweigh those of a compliant or industrial scheme. The following response addresses each issue raised:

1. Accuracy of the percentage exceedance and revised Clause 4.6

It is accepted that the 27.9m proposed height represents a 203% variation above the 9.2m height development standard under the Parramatta LEP 2011. The applicant has submitted a revised Clause 4.6 variation request, which correctly states the numerical variation and provides a detailed justification addressing both clause 4.6(3)(a) and clause 4.6(3)(b). That revised document forms part of this response and supersedes previous iterations. It provides a comprehensive rationale based on built form testing, strategic alignment, site context, and the statutory framework under the Housing SEPP.

2. Nature of the SCC and role in permissibility versus development standards

We agree with the department's view that the SCC confirms permissibility but does not override development standards under a local environmental plan. This position is reinforced by legal advice from Lazarus SC and Mr Doyle, which was provided to the department during the SCC process.

However, the SCC remains a statutory instrument issued under division 5 of the Housing SEPP and carries significant probative value in evaluating whether a proposed development is compatible with surrounding land uses. The SCC conditions expressly require detailed testing and refinement of built form to confirm that the resulting proposal remains compatible. The Clause 4.6 variation now submitted is not based on the SCC "determining" the maximum height, but rather demonstrates how the height outcome is the result of performance-based refinement required by the SCC. The current design and height have evolved from those compatibility-focused conditions, which must be taken into account when assessing reasonableness and planning merit.

3. Clause 4.6(3)(a): Why compliance is unreasonable or unnecessary

The revised Clause 4.6 request clearly articulates why strict compliance with the 9.2m standard is unreasonable and unnecessary, drawing upon statutory principles, urban design analysis, and performance outcomes. Key points include:

The mapped height standard was designed for the regulation of industrial buildings in the IN1 zone and not for residential flat buildings. Ironically, the existing industrial building exceeds the height standard by

more than 15 metres and creates significant visual and contextual conflict with surrounding heritage items.

A strictly compliant scheme would lead to inferior environmental, urban design, and heritage outcomes, including:

- Compression of building mass, increasing horizontal bulk and reducing building separation;
- Loss of solar access and setbacks for tree planting;
- Reinforcement of visual intrusion into Hambledon Cottage and Experiment Farm Reserve;
- Reduced yield and inability to achieve a viable or diverse affordable housing scheme.

The proposal has been designed through extensive architectural and heritage consultation, including detailed advice from Stanistic Architects, Urbis (heritage), and Scott Carver (urban design). The final height outcome is not the product of yield maximisation but the logical result of refining form to balance competing heritage, solar, view corridor, and public domain factors.

4. Clause 4.6(3)(b): Environmental planning grounds

The revised request articulates strong environmental planning grounds for the proposed height, including but not limited to:

- Enabling a contextually derived height and massing strategy that integrates with topography and surrounding land use intensity.
- Resolving existing heritage conflicts by removing an intrusive industrial form and establishing meaningful curtilage and landscaped setbacks.
- Delivering 50% affordable housing under a build-to-rent model, consistent with Housing SEPP and State Government housing policy.
- Achieving improved outcomes in daylight access, tree canopy, thermal performance, and landscape permeability compared to a compliant or permissible industrial scheme.

5. Urban design compatibility and further review

We welcome the department's proposed independent urban design review. The submitted VIA, design guidelines, consolidated landscape concept, and visual testing all support the conclusion that the proposed height is appropriate and that bulk has been strategically placed to avoid impact. The interface with the childcare centre has been designed to ensure overshadowing falls well within ADG-compliant parameters, and privacy controls have been incorporated through separation, articulation, and screening.

Furthermore, the proposal:

- Withdraws height and massing from the northern heritage interface,
- Establishes a 30-metre landscaped view corridor,
- Concentrates height away from sensitive areas and integrates building heights with adjacent topography,
- Restores parkland and curtilage quality through meaningful landscape intervention.

6. Consistency with objectives of clause 4.3 of the LEP

The revised Clause 4.6 request now directly addresses each objective of clause 4.3 of the Parramatta LEP 2011, including:

- Providing a transition in built form and intensity.
- Minimising visual impact and preserving heritage views.
- Ensuring sky exposure and solar access to the public domain.
- Respecting the scale of adjacent low-density areas through appropriate separation and stepping of height.

Conclusion

The revised Clause 4.6 request addresses all statutory requirements under the EP&A Act and the Parramatta LEP 2011. It clearly articulates how the proposed height is compatible, justified, and necessary to achieve superior public, social, and environmental outcomes. The height is not an attempt to override planning controls, but rather a carefully modelled response to the complex constraints of the site—specifically heritage, topography, solar access, and interface conditions.

We respectfully submit that a blanket reduction in height would undermine the compatibility, heritage resolution, and social benefit that this project has been structured to achieve.

Issue: Overshadowing, Setbacks and Amenity

- *The shadow diagrams submitted with the EIS indicate that the creek corridor walk would have substantial overshadowing during winter. This, combined with narrow setbacks and long buildings are likely to result in poor amenity for its users. Provide amended plans with increase setbacks to Clay Cliff Creek and increased sunlight access to the corridor walk during mid-winter. Alternatively, discuss why this cannot be reasonably achieved and alternative measures to ensure a high level of amenity would be achieved by the development.*
- *Provide a minimum setback to the Gregory Place street frontage of 6m to conform with the surrounding residential development and allow for large trees to be planted and grow to maturity.*
- *The Department has identified that the proposal would result in significant overshadowing impacts on the childcare centre known as ‘Young Academics Early Learning Centre’. Section 4.11 of the NSW Child Care Planning Guide requires outdoor play areas for childcare centres to have “have year-round solar access to at least 30 per cent of the ground area, with no more than 60 per cent of the outdoor space covered”. The childcare centre is located directly to the south of the site (as highlighted in yellow below). The submitted shadow diagrams indicate that Buildings B and C would restrict the childcare’s sunlight access to less than 1 hour per day mid-winter. The Department requires that overshadowing impacts are sufficiently reduced to demonstrate that no significant additional overshadowing of the childcare centre would occur as a result of the development. Further setbacks for buildings adjoining the canal in combination with a reduction in height may address this issue.*

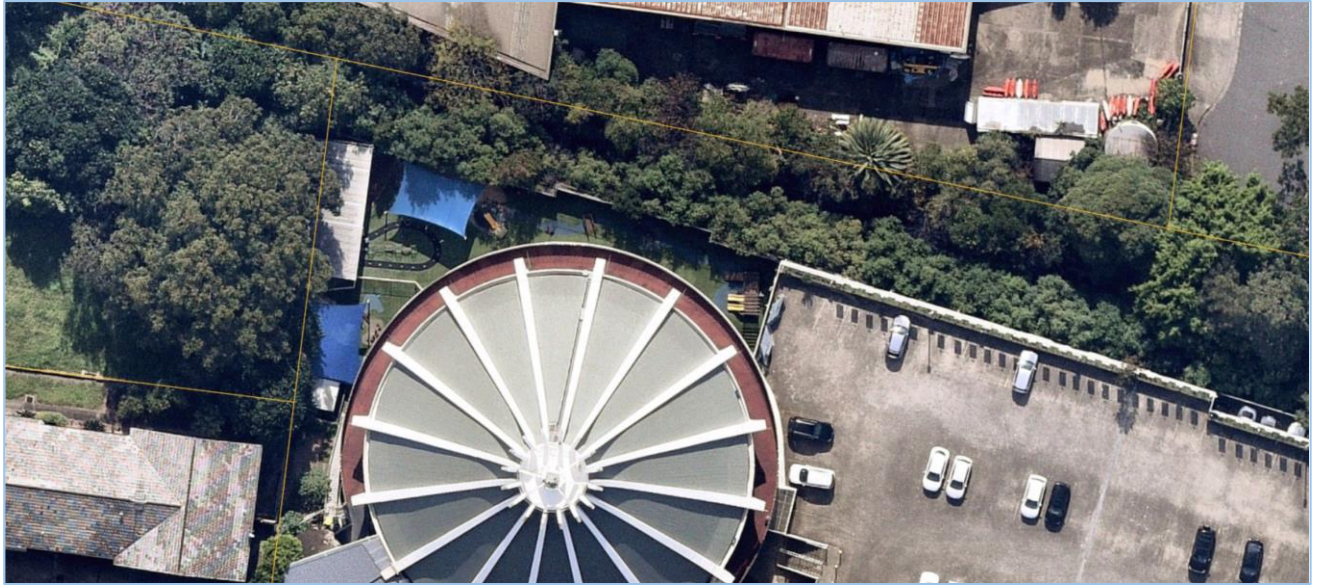


Figure 25 Ariel view of south boundary childcare location

- Section 3.5 of the Child Care Planning Guideline states that “Visual privacy is about allowing residents on adjacent properties to occupy their private space without being overlooked by child care facilities and ensuring child care facilities are not overlooked by neighbouring properties”. Provide a view diagram demonstrating that direct line of sight into the adjacent childcare centre would not occur from south facing apartments or the “Link Terrace” of building A.

Response

Overshadowing of creek corridor walk

The updated design ensures that the channel walk receives sunlight during key parts of the day, particularly from morning to the early afternoon. This is achieved by varying the width of the channel walk, which ranges from approximately 6 meters to wider sections between key landmarks. This variation allows for different spatial experiences and ensures that certain areas receive more sunlight than others. Please refer to the design report (Appendix A) prepared by Tzannes for further detail relating to this issue.

Setback to Gregory Place

The built form is now set back 6 metres from the Gregory Place boundary. Please refer to section 3.3 and Section 7 of the design report for further detail.

Overshadowing childcare centre

Careful planning has ensured that the outdoor space of the Young Academics Early Learning Centre - Harris Park will receive solar access exceeding the requirements set out in the NSW Child Care Planning Guide. Refer to shadow diagrams in section 7.4.2 of the design report for more detail.

Childcare centre visual privacy

Building separation is provided per ADG requirements. The roof terrace directly north of the child care is designed to be non-accessible green roof with solar panels, further reducing overlooking possibilities.

Refer the roof plan in section 7.1.11 of the design report for more detail.

Issue: Noise

- Confirm the location of noise monitoring location L2 within the submitted Acoustic Report and advise whether noise was monitored internally from the existing warehouse building or externally. Provide a comment from an acoustic specialist regarding noise emissions and their impacts on future residents from the adjacent childcare centre and special event activities which occur within the grounds of “Our Lady of Lebanon”, including night time and celebration events.

Response

Refer to the update acoustic assessment, section 4.2.4. This identifies the noise monitoring location of L2 as being on the roof of the existing building. The advice from this report includes:

With an external noise level of 73dB(A)Leq, if providing the glass nominated in table 5 (6.38mm laminated glass to bedrooms and living areas on the southern façade), the internal noise level within the bedrooms/living rooms will be 47-49dB(A)Leq. In our view, this is a reasonable outcome and compliant with the DCP 2023.

Assuming that the OLOL is operating its special events with appropriate permissions (regarding time, noise generation etc), this implicitly indicates the noise impact on nearby residences from the activity must be considered reasonable (presumably on the basis it occurs infrequently).

Given that the proposed development will have a modern façade (to provide better acoustic protection), and is no closer than pre-existing residential development that is closer to the OLOLC site, there should be no reason that the proposed development would unreasonably curtail any currently permitted use of the OLOLC site.

Arboricultural Impact

Following consultation and exhibition, as discussed throughout this response to submissions report, the scheme has been updated to directly address the matters raised in submissions. The modifications to the scheme has resulted in a reduction to the extent of building footprints and increased setbacks along all boundaries.

As a result, the Arboricultural Impact Assessment, prepared by Horticultural Management Services, and included at Appendix FF, has been updated. The report addresses the matters raised by the Department of Planning and Environment and the council.

Issue: Tree Preservation

- *The Department has identified that trees may not be able to be retained (that are identified to be retained) as they are in close proximity to the building envelopes of Building A and C, the proposed basement, and the internal accessway/emergency driveway. The submitted architectural plans indicate that some trees to be retained would have incursions into their tree protection zones (TPZ) of more than 10% (a major encroachment under AS 4970-2009 Protection of trees on development sites). Their canopies would also require significant trimming, and some trees may have incursions into the structural root zones (SRZ). The European heritage report, community consultation report, wind report, and view analysis all emphasise the importance of these trees being retained.*

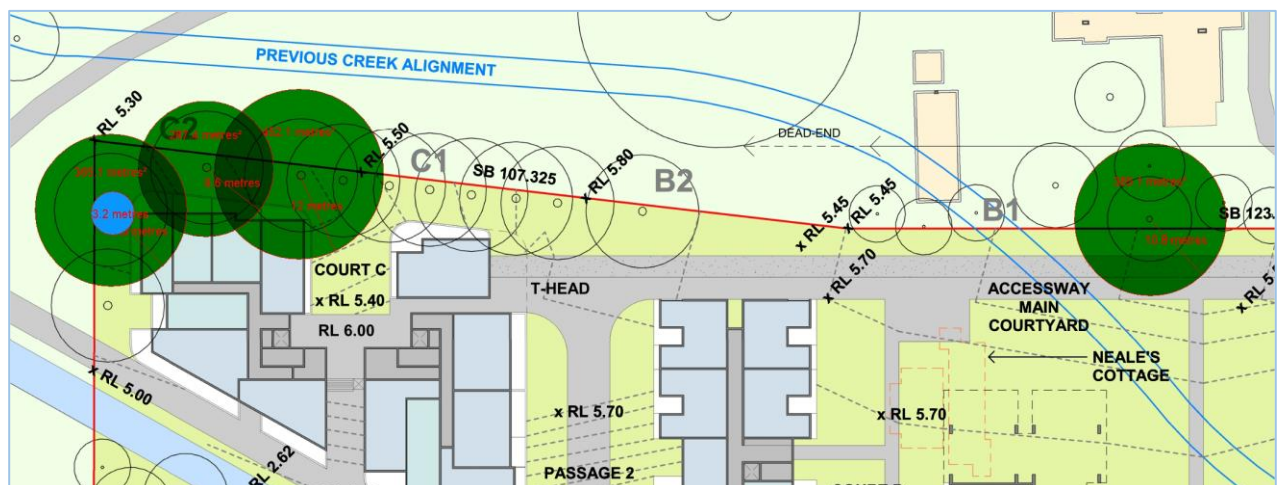


Figure 26 Tree locations

Response

Overall, the building design and tabled setbacks have been considered with the revised scheme and setbacks improved with respect to the separation of site and adjoining trees to the proposed building envelope, and basement location and excavations and scope of works from the trees proposed to be kept.

The updated arborist report nominates the following trees to be retained, protected, and managed in accordance with AS 4970-2009 *Protection of trees on development sites*.

The following Trees Numbered 63, 64, 87, 88, 119, 120, 121, 122, 125, 126, 127, 128, 129, 130, 131, 132, 134, 135, 137, 140, 141, 142, 143, 144, 145, 146, 147, 148, 149, 150, 151, 152, 153, 154, 155, 156, 174, 175, 176, 177, 178, 179, 180, 181, 190, 191, 192, 207, 208, 209 and 210 are sufficiently distanced to be safely retained, protected and managed by an AQF L5 Project Arborist with works undertaken in accordance with the attached Tree Management Plan.

Issue: Tree Identification

- *The arboricultural assessment report does not clearly identify tree numbers and contains several technical issues including:*
 - *the provision of tree protection fencing within building envelopes.*
 - *no discussion about required tree canopy pruning.*
 - *no discussion about the individual level of impact trees would occur. E.g., TPZ, SRZ incursions.*

Note: The AIA shows tree protection fencing within building envelopes and trees to be retained within close proximity to building envelopes. Tree numbers are not visible.

Response

The attached Arboricultural Impact Assessment report has been updated to clearly identify tree numbers, tree protection fencing, tree canopy pruning requirements and a discussion on the level of impact on trees.

The building design and setbacks have been updated with TPZ setbacks improved with respect to the separation of site and adjoining trees to the proposed building envelope, basement location and excavations and scope of works from the trees proposed to be kept.

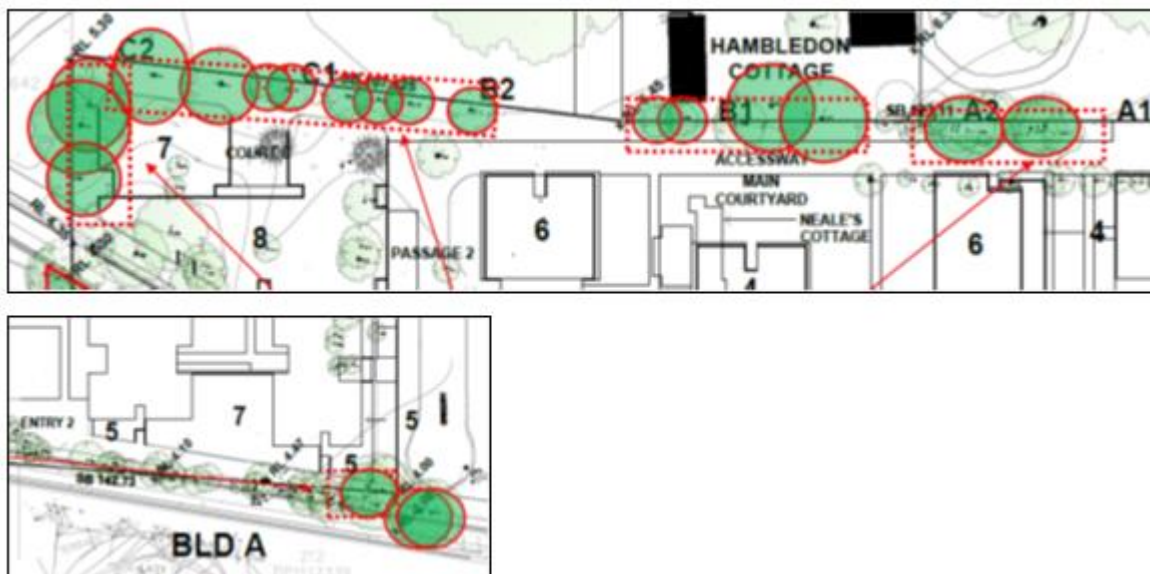


Figure 27 Tree Identification

The updated arborist report nominates the following trees to be retained, protected, and managed in accordance with AS 4970-2009 *Protection of trees on development sites*.

The following Trees Numbered 63, 64, 87, 88, 119, 120, 121, 122, 125, 126, 127, 128, 129, 130, 131, 132, 134, 135, 137, 140, 141, 142, 143, 144, 145, 146, 147, 148, 149, 150, 151, 152, 153, 154, 155, 156, 174, 175, 176, 177, 178, 179, 180, 181, 190, 191, 192, 207, 208, 209 and 210 are sufficiently distanced to be safely retained, protected and managed by an AQF L5 Project Arborist with works undertaken in accordance with the attached Tree Management Plan. Based on the separation distance no trees are recommended/required to be pruned.

Issue: Temporary access to the north-west portion of the site

The architectural plans indicate that temporary access to the north-west portion of the site would be provided via Parkes Street. This location on the site is proposed to have tree protection fencing. In addition, the general storage of materials is recommended outside of a retained TPZ.

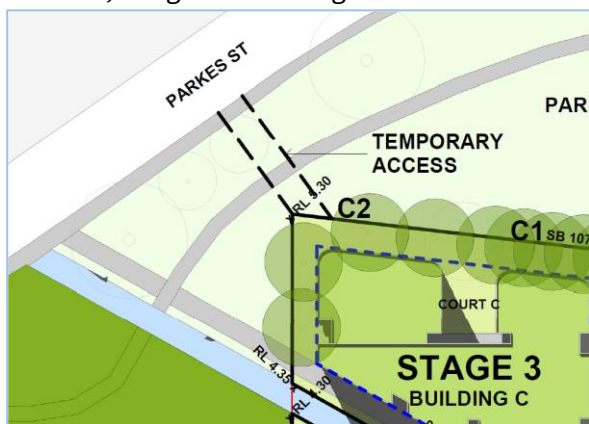


Figure 28 Temporary access

Response

The previously proposed temporary access via Parkes Street has been removed. The updated arborist report considers the storage of materials within retained tree TPZs as per Section 10 Tree Management Plan and additional sections.

Issue: Tree Preservation Submission Requirements

- *The following must be submitted with regard to tree preservation:*
 - *A tree survey plan that clearly shows tree numbers and their location.*
 - *A site plan that shows the TPZs and SRZs of trees to be retained in relation to proposed building envelopes.*
 - *TPZs of trees to be retained must not have more than a 10% incursion into their TPZs and no incursions into their SRZs. This may require reduced building envelopes.*
 - *A discussion on the amount (percentage) of tree pruning required for retained trees before construction.*
 - *An amended tree protection plan that shows tree protection fencing outside of proposed building envelopes.*

Response

The attached tree preservation documentation includes the following supplementary information to address the additional information requirements, including but not limited to:

- A tree survey plan clearly shows tree numbers and their location,
- A site plan that shows the TPZs and SRZs of trees,

- TPZs of trees to be retained,
- A discussion on the amount (percentage) of tree pruning, (Not required)
- An amended tree protection plan that shows tree protection fencing.

TPZs of trees to be retained must not have more than a 10% incursion into their TPZs and no incursions into their SRZs. The updated plans have considered the above regarding retained tree TPZs as per Section 10 Tree Management Plan and additional sections.

Whilst the AS 4970-2009 *Protection of trees on development sites* recommends as a general guideline, incursions under 10% are favourable, greater incursions above this rule are permissible as tabled in Section 3.3.3 Major Encroachment and Section 3.3.4 TPZ Encroachment Consideration, in which the project Arborist must demonstrate that the trees would remain safe, viable with consideration of the their individual location, species, age and scope of works, which have been addressed in the assessment.

Issue: Landowner Consent

- *Clarification if temporary construction access from Parkes Street is sought as part of this application. If so, confirm that land owner's consent has been provided, and include a discussion on tree impacts within the amended Arboricultural Impact Assessment.*

Response

Temporary construction access is no longer sought from Parkes Street. The submitted documentation has been updated.

Issue: Landscaping

The total landscaped area calculations within the architectural plans show passages, accessways, walkways, and roof terraces as "landscaped area". Landscaped area is defined as "part of a site used for growing plants, grasses and trees, but does not include any building, structure or hard paved area" under the Parramatta Local Environmental Plan 2011.

These area should be included as open space and not landscaped areas. updated architectural plans with accurate landscaped area calculations are required.

There are inconsistencies between the total landscaped area calculations in the architectural plans (CD4007) and page 20 of the landscape plans.

The architectural plans indicate skylights would be installed for sunlight and cross ventilation within the roof. The landscape plans indicate that the entirety of the roofs would include vegetation in the form of "green roofs". The Energy Efficiency & Ecologically Sustainable design report notes that a 500 kW PV solar system would also be installed on the roofs. Address how all three of these outcomes would be feasibly achieved and describe any required amendments to area calculations, solar access or cross ventilation.

The original line of Clay Cliff Creek appears to be shown at different locations within the landscape plan (pages 3 and 4 differ from pages 9 and 9). Provide a more detailed discussion on how the original line would be interpreted into the landscape design.

Provide additional discussion on tree planting above the proposed basement level, confirming that all identified tree plantings would feasibly reach maturity.

Response

landscaped area calculations

The design and open space calculations have been refined. Refer to; section 7.4.5 of the Design report for Communal Open Space and deep soil calculations of the amended concept design.

Deep Soil Zone	2,705.2m ² (13.9%)

<i>Deep Soil Area less than 6m wide for additional landscaping</i>	<i>1,637.7m² (8.4%)</i>
<i>Constructed Soil Area</i>	<i>1,693.5m² (8.7%)</i>
Total Soil Area	6,036.4m² (31%)

Open space calculations

The design and open space calculations have been refined. Refer to section 7.4.5 of the Design report for Communal Open Space and deep soil calculations of the amended concept design.

<i>Communal Open Space</i>	<i>3,582.4m² (18.4%)</i>
<i>Area Publicly Accessible Open Space Area</i>	<i>8,908.7m² (45.7%)</i>
Total Open Space Area	12,491.2m² (64.1%)

Inconsistencies in total landscaped area calculations

Landscape and open space areas are updated and identified in section 7.4.5 of the design report.

Roof area landscaping, skylights and solar panels

The roof area design has been updated in a coordinated approach between the design, landscaping and energy strategy. SLR, the ESD consultant for the project, recommends a 271kW solar system to minimise greenhouse gas emissions. The updated design documentation indicatively indicate that this can be supported in part on the level 4 roof (refer to section 6.3.2 of the design report) and mainly on the level 8 roof (refer to Section 6.3.4 of the design report). This confirms that an area of 1,086m² is allocated at this stage, subject to detailed design and the determination of the PV panel size.

Original line of Clay Cliff Creek

The extensive analysis by the project team has identified that what is known as Clay Cliff Creek was, prior to colonisation, a discontinuous chain of ephemeral ponds. Settler activity disrupted this by draining the wetlands, clearing vegetation, grazing sheep and cattle and introducing rabbits. These activities caused rain to bite into watercourses, converting the chains of ponds into continuous streams in incised channels up to 15 metres deep, with water draining quickly away.

It is likely the landscape between Clay Cliff Creek and the Parramatta River had uneven and low-lying surface topography that features chain of ponds drainage and swampy meadows formation vegetation and ecologies.

The access to fresh water that would have made it a suitable location for the establishment of the early colonial agricultural projects in the area would also have made it a valuable place for Burramattagul people pre colonisation. The historic chain of ponds was replaced by a new stormwater channel, removing traces of the pre-colonial life on Country. For this reason, the updated Statement of Heritage Impact, and other expert reports, refer to this watercourse as a 'stormwater Channel'.

Due to this analysis and research, there is no 'original' outline of Clay Cliff Creek. Refer to Section 4.1.8 Clay Cliff Creek Stormwater Channel of the attached design report, and the updated Aboriginal cultural Heritage Assessment Report for analysis on Clay Cliff Creek watercourse evolution. Also refer to Section 5.5 Landscape Strategies of the design report for the interpretation of it in landscape design.

Tree planting above the proposed basement level

Refer to section 6.1.4 Deep Soil Area of the Design report. Structural Soil Areas are proposed above basement areas. These areas will provide a nominal 1.5m deep soil zone. The design report notes this depth is adequate to accommodate tree root zones.

Issue: Heritage

- *The statement of heritage impact incorrectly refers to the development as low-rise medium density.*

- *The Department is not satisfied that the application demonstrates that the development would not have a detrimental impact on adjacent heritage items. The Department is seeking an external peer review of the proposal in regard to potential heritage impacts. An additional request for information may be provided after this review is complete.*
- *Please indicate whether a fence is proposed between the subject site and the land to the north containing Hambledon Cottage.*

Response

Development description

Following the feedback received through the exhibition and engagement processes, the concept has been updated and modified through a new evidence-based approach to the design and urban proposition for the site. In doing so, the Statement of Heritage Impact has been substantially updated and expanded.

In preparing the updated SHI report, GBA Heritage has undertaken additional research into the historical and physical evolution of the Harris Park Precinct, located between the three Colonial buildings and the Parramatta River. This research has included a review of several independent studies prepared between 1993 and 2020 commissioned by council and the NSW Heritage Council that reveals the growth in public awareness of the Aboriginal and Colonial cultural values of the Harris Park Precinct.

A detailed description of the updated concept design is included under Section 6 (page 114 onwards) of the attached updated Statement of Heritage Impact at Appendix P.

Detrimental impact on heritage items

The issue of a perceived ‘detrimental impact’ for a variety of different reasons has been a popular theme raised through the exhibition process, and targeted engagement with key stakeholders. As mentioned above, a new evidence-based co-design process has been undertaken since the exhibition to specifically target and address these issues.

In response to this issue, and similar concerns related to bulk and scale, visual impacts, setting, and contextual fit, and number of various responses have been prepared that have cumulatively informed the revised scheme and its impact on its setting.

Refer to:

- Statement of Heritage Impact which addresses specific comments and considers in detail the impact of the revised scheme on its setting (refer to Table 1 of that report).
- Section 2 of this report, which addresses compatibility.
- Section 3.6 of the attached design report.

Fencing

The design aims to have a continuous, accessible ground plane by blurring the site boundaries. Connections are established to Clay Cliff Creek stormwater channel, Hambledon Cottage, and extending further to the Parramatta River. This approach seamlessly integrates the site within the parkland setting, enhances access to surrounding public parks, and improves visibility as well as appreciation of Hambledon Cottage within the public domain.

Special considerations have been made to address concerns from the Parramatta & District Historical Society. It is acknowledged that the fences around the Cottage will remain. The boundary between the project site and the park near Gregory Place will feature low planting for physical separation, while providing pathways at frequent intervals to allow controlled access between the properties.

An alternative design is provided within section 6.1.2 of the design report which provides the consent authority with the alternative of a physical fence, contrary to the urban design advice.

Issue: View Impact analysis

- *The submitted visual impact statement does not provide key view points as required within the SEARs. Provide additional view points from:*
 - *Within the grounds of Hambledon Cottage with a direct view of the cottage,*
 - *Within the grounds of Hambledon Cottage Reserve, and*
 - *Within the grounds of Elizabeth Farm.*
- *Provide an assessment of how the concept proposal may impact the historic view corridors within the Parramatta Development Control Plan 2011.*

Response

Whilst it is acknowledged that DPE has requested additional views be prepared, the Tzannes Visual Impact Assessment (VIA), as provided at Appendix E, has carefully and wholistically considered the visual impact of the proposal by firstly undertaking a visual survey to qualify the visual catchment of the proposal and surrounding Heritage and Cultural sites. This survey identified that the flat landscape and extensive existing built form and vegetation greatly impact visibility. Where visibility was identified, it was carefully considered by Tzannes and GBA to ascertain the importance and relevance of the view. Those views, and the views identified in DPE's letter and those raised by stakeholders have been considered in the revised VIA.

Key views

Refer to the updated VIA prepared by Tzannes. Multiple views have been provided. Specifically:

1. Within the grounds of Hambledon Cottage with a direct view of the cottage; Section 2.2.3 view 2.
2. Within the grounds of Hambledon Cottage Reserve; Section 2.2.4-6 views 8, 16, 17, 22 and 23.
3. Within the grounds of Elizabeth Farm; Section 2.2.4 views 57 and 61.

Historic view corridors

A visual assessment of the impacts of the Historic DCP View Corridors has been prepared. Refer to the updated VIA Section 2.7.

This visual assessment includes photomontages of the proposed envelope placed side by side with the same photo of the existing conditions on site for ease of comparison.

The following comparative views are relevant to the public streets surrounding the project site:

- Comparative view 1 - DCP Historic View Corridor 7
- Comparative view 2 - DCP Historic View Corridor 8
- Comparative view 3 - DCP Historic View Corridor 9

Comparative views 1, 2, and 3 all demonstrate that the proposed envelope has no visual impact on the DCP Historical View Corridors between Experiment Farm, Hambledon Cottage and Elizabeth Farm.

It is noted that the analysis by GBA Heritage has identified that the genesis of the DCP view corridors is from a study undertaken in 1997. An aim of this study was to identify views out of and towards historical sites. This study did not consider the historical significance of the views. Regarding the DCP view corridor between Experiment Farm and Hambledon Cottage, Hambledon Cottage originally faced east, with its outbuildings at the rear facing Experiment Farm. Additionally, John Harris and John Macarthur had a bitter relationship, and Experiment Farm was not Harris' initial choice, it is the view of GBA Heritage that there is no historical connection between Elizabeth Farm and Experiment Farm.

Furthermore, a review of the statement of significance for each heritage listed item shows that there is no mention of any physical or visual connection between these three heritage listed items and their grounds, contributing to their heritage significance. The commentary in relation to these three view corridors in that statement by GBA Heritage includes:

“The identified historic view corridor No.8 from Hambledon Cottage to Elizabeth Farm would have been lost by the 1950s due to the residential development along Alfred Street and Gregory Place. The identified “Historic View Corridors No 7 and 9 from Experiment Farm and Elizabeth Farm to Hambledon Cottage” by the 1997 study were described as being limited to the tall trees within the Hambledon Cottage property”.

Issue: Flooding

- *The Department is not satisfied that the application has adequately assessed or responded to the flooding risks and constraints of the site. The Department is seeking an external review of the proposal. The following data is requested:*
 - *A copy of the WBNM hydrologic and TUFLOW hydraulic modelling underpinning the Flood Study prepared by GRC Hydro*
 - *A copy of the TUFLOW flood mapping results including checks and raw files*
- *There appears to be inconsistencies between the flood modelling provided in the flood report and council’s adopted flood maps. The modelling must be updated to take into consideration council’s adopted flood study levels. Any revised modelling should also address the site’s classification as being within a ‘High Flood Hazard Area’ including consideration of the structural integrity of the proposed building within the identified hazard area. The revised modelling should also consider blockage factors, overland flows and climate change.*
- *Provide additional detail about the proposed 1000m3 of flood storage, including but not limited to storage requirements, pump out process and any further regulatory approvals required for the storage and disposal of captured water.*
- *Provide flood details for each individual stage of development. For example, how would a 1% AEP flood impact the development if only Stage 1 was completed, and no additional flood storage was present.*

Response

Since the submission of the EIS, the council has adopted the Parramatta River Flood Study. Due to this, the proposal has remodelled and reassessed the updated scheme with regards to the current adopted flood study. The updated flood impact assessment can be found at Appendix N.

External review

In order to assist the department undertake its external review of the proposal, a link to download the following documentation has been included as an appendix to the updated flood impact assessment. as requested.

- A copy of the WBNM hydrologic and TUFLOW hydraulic modelling underpinning the Flood Study prepared by GRC Hydro.
- A copy of the TUFLOW flood mapping results including checks and raw files.

Council’s adopted flood maps

GRC Hydro have identified council's PRFS flood modelling includes errors which precludes the ability for it to be relied upon at this site.

These errors have been acknowledged by council (please refer to Appendix N the updated Flood Assessment prepared by GRC Hydro).

In GRC's modelled 1% AEP event (including climate change), the site is not subject to high hazard. Only Clay Cliff Creek Stormwater Channel to the south of the site experiences high hazard with H5 and H6 remaining wholly within the channel (see Figure 14 of the flood impact assessment).

In the highest theoretically possible event, the PMF, the site is subject to H5 hazard only in one small corridor at the western end of the site (see Figure 16). In a PMF event, occupants will be sheltering within the buildings separate from this hazard and elevated on levels 1 or above – above the PMF level.

Some building walls are subject to H4 in the worst case with most of the walls subject to either no flooding or low hazard flooding (H1 or H2).

Flood storage

The updated proposal has reduced the building footprint and no longer requires the flood water undercroft passage under building C (not floor storage as noted in the letter) and this is no longer a consideration.

Staging

The proposal will no longer be staged so this is no longer a consideration.

Issue: Ground and Water Conditions

- *The proposal may require development within waterfront land as defined under the Water Management Act 2000 and the riparian zone as per the Guidelines for controlled activities on waterfront land (Natural Resources Access Regulator).*
- *An assessment must be undertaken of the potential impacts of the development to waterfront land. This assessment must identify any appropriate mitigation measures and regulatory approvals, if applicable.*
- *Provide an assessment of whether the development, including all construction activities, would meet the definition of an aquifer interference activity as defined by the Water Management Act 2000.*

Response

Development within waterfront land

The development is exempt from requiring approval for works within waterfront land, as Clay Cliff Creek is a ‘fully concrete lined’ watercourse, under Part 2 Schedule 4 Clause 28 of the Water Management (General) Regulation 2018.

Clay Cliff Creek, a ‘fully concrete lined’ watercourse, traverses through the southwest section and along the southern boundary of the concept SSD property. The concept SSD would include development approximately 5m distance from the Clay Cliff Creek high-bank level. Therefore, a proportion of the proposed SSD will occur within 40m of the high-bank and as such is considered ‘waterfront land’ under the WMA 2000.

The Water Management (General) Regulation 2018 specifies a number of exemptions. Clause 42 states:

“A person (other than a public authority) is exempt from section 91E(1) of the Act in relation to controlled activities specified in Part 2 of Schedule 4 that are carried out in, on or under waterfront land.”

the Act refers to:

“the Water Management Act 2000.”

Clause 91E (1) of the Water Management Act 2000 No 92 states:

“91E Carrying out controlled activity without, or otherwise than as authorised by, a controlled activity approval

A person—

who carries out a controlled activity in, on or under waterfront land, and

who does not hold a controlled activity approval for that activity, is guilty of an offence.”

Part 2 Schedule 4 of the Water Management (General) Regulation 2018 defines the controlled activities exemptions. Clause 28 relates specifically to Activities on waterfront land if river is concrete lined or in pipe, which states the following exemption:

“Any activity carried out on waterfront land relating to a river where the channel of the river is fully concrete lined or is a fully enclosed pipe channel.”

This clause provides an exemption to the “Controlled Activities” in the Water Management Act 2000, including the requirement for a Riparian Zone Management Assessment.

Assessment of development to waterfront land

Exemption applies for a Controlled Activity, for reasons stated above. Therefore, an assessment of the potential impacts of the development to waterfront land is not applicable

Aquifer interference activity

The basement for the concept SSD extends into a superficial alluvial aquifer, which is considered an ‘aquifer interference activity’ under the Water Management Act (WMA) 2000 and Aquifer Interference Policy.

NSW DCCEEW are the regulatory approval authority for these matters, which has been discussed in our previous responses above.

Issue: Car Parking/Vehicular Access

- *The proposed 634 car parking spaces exceeds the minimum standards within the Housing SEPP by 537 spaces, and the Parramatta Development Control Plan 2011 by 64 spaces. Provide a discussion on the appropriateness of 634 car parking spaces and why 634 car parking spaces are proposed.*
- *It is unclear whether vehicle drop-offs, taxi pick-ups, food delivery etc. would occur via the common driveway parallel to the northern boundary or within the basement car park. It is considered unlikely that this could occur within the basement car park given the size and residential nature of the development. Provide an analysis from a qualified traffic consultant regarding the anticipated usage of the common driveway, required width and required turning areas. The application must ensure that an appropriate driveway width is established along with adequate pedestrian areas and a deep soil zone.*

Response

Parking spaces

Please refer to sections 4.3 and 5.2 of the Transport and Accessibility Impact Assessment (Appendix T) prepared by SCT consulting. The new proposed parking complies with relevant controls and documents. Parking demand analysis shows appropriate parking provision based on car ownership data. No significant impacts on on-street parking in the area are expected.

Drop-off and pick-up

The updated design has reconsidered access across the site. A shared zone is proposed along the northern boundary of the site and will function as a single-lane bi-directional service lane to accommodate trade, delivery, and removalist vehicles of up to small rigid vehicles (SRVs). Yield and loading spaces are provided at intervals along the southern side while a turn-around bulb is located at the western end of the shared zone. A speed limit of 10km/h will be imposed to ensure a low-speed environment that prioritises pedestrians.

Issue: Waste Collection

- *The EIS indicates that the basement waste collection will be designed for a medium rigid vehicle, whereas the architectural plans indicate they would be designed for a heavy ridged vehicle. The Parramatta Development Control Plan requires basement waste collection to be designed for a heavy rigid vehicle as the buildings would be over 5 stories in height. Given the large scale of the development, servicing the development with a large truck would be beneficial as it would reduce the number of vehicles accessing the site. Additionally, it would allow for any bulky goods to be collected from within the basement and not the street. Please clarify what type of rigid vehicle the basement would be designed or.*

Response

Vehicular access and loading facilities have been provided and designed in accordance with Australian Standards 2890.2 (Parking facilities Part 2: Off-street commercial vehicle facilities) for the standard

12.5m long Heavy Rigid Vehicle (HRV), including a 4.5m headroom clearance and compliant driveway ramp grades. Refer to page 22 of the revised Waste Management Plan (Appendix J); Waste Collection (Operational Waste).

Also refer to section 4.2.4 Servicing and loading/unloading strategy of the Transport and Accessibility Impact Assessment by SCT Consulting that confirms that the loading and waste zone is designed for a HRV.

Item 7.1.2 Basement 1 plan in the Design report shows the Loading and Waste Zone accommodating a HRV.

Issue: Development Staging

- *The architectural staging plan indicates that there would be 4 stages of development. Only 3 stages of development are described within the EIS. Please clarify how many development stages there are proposed to be.*
- *Provide a discussion on when site connections, landscaping and accessways would be completed.*

Response

The development is no longer proposed to be staged. The detailed SSD Application will be prepared as a single submission.

Issue: Affordable Housing

- *Clarify if each development stage is proposed to contain the minimum 50% of dwellings as affordable housing.*
- *Clause 40 (1)(b) of State Environmental Planning Policy (Housing) 2021 requires that dwellings that are used for affordable housing must be managed by a registered community housing provider. Clause 73(1)(c)(ii) requires build-to-rent housing be operated and managed by 1 managing agent. Clarify whether the social housing provider would manage the whole development.*

Response

The development is no longer proposed to be staged. The development as a whole will include 50% affordable housing.

The Community Housing Provider, Pacific Community Housing, will manage the entire development, complying with both clause 40(1)(b) and 73(1)(c)(ii).

7.2 Consideration of department engaged heritage and urban design review

Issue: Urban Design Review – 21 November 2022

The urban design review suggests that the project in its current form has not demonstrated a sympathetic or contextual fit to the site's surrounding heritage and low-density context. This is contrary to item No. 3 of the Site Compatibility Certificate that requests the layout, design, and number of dwellings to be considered in relation to heritage, bulk, and scale, among other issues. Other than the original design lodged with the application for the Site Compatibility Certificate, it is also considered that alternative designs have not been sufficiently explored and presented in the environmental impact statement.

The application largely relies upon the roof height of Our Lady of Lebanon Church, the existing industrial buildings on site and other residential development to the south of Clay Cliff Creek to justify the proposed 8 storeys. The review suggests more emphasis needs to be given to the surrounding

landscape to the north, east and west of the site when considering an appropriate built form. This advice echoes concerns raised in the Department's RtS letter to you that explains that the Clause 4.6 request does not provide sufficient grounds to argue why the non-compliant height is appropriate, and why non-compliant height would support better or equal environmental, social, and economic outcomes as compared to a compliant height. The Department considers that the local controls relating to the site aim to preserve the existing character of the area. Therefore, the application must demonstrate that the project is in keeping with the existing character of the area and that it appears visually appropriate in its context.

The review found that long building lengths and large overall dimensions would result in an inappropriate transition from the lower density dwellings to the east, and sub-optimal internal amenity.

The 77m length of Building A facing Gregory Place, combined with heights of 6 to 8 storeys and reduced ground level setbacks exacerbate the level of bulk and will have a significant impact on the overall streetscape and character of Gregory Place. The review recommends that this building be broken into smaller buildings which could also allow for a driveway entrance away from Hambleton Cottage.

The long north/south building lengths of building A and B result in a large number of units facing each other without the possibility of deep soil planting to obscure views. The SDRP in their second response also noted that the bulk and scale of the buildings have impacts in terms of overshadowing, privacy, acoustic comfort and amenity and that they need to be analysed further and reviewed to ensure that they support successful landscaped spaces and high amenity living spaces. The review recommends deleting the northern 4 storey portion directly behind Hambleton cottage to both increase internal amenity and reduce the impact on the setting of the heritage item.

The urban design review found that the visual impact analysis did not assess key vistas which are essential to the assessment of heritage views. Additional visual analysis is required in order to assess view corridors, visual markers that still exist between the nearby three state heritage items and impacts to the setting of Hambleton Cottage. The review recommended that mapping and documenting existing views should inform where massing may be sufficiently screened and where landscape features and wayfinding elements may be retained. This approach would assist in determining the appropriate density and height on site and is consistent with advice received from the GANSW that states "demonstrate how the built forms and landscape are meaningfully and respectfully responding to the Heritage context".

The introduction of the east/west extension to the heritage walk was identified as a positive outcome in the urban design report, which could provide a valuable physical link within the precinct and between the state listed heritage items. However, for it to be successful, the review recommends greater southern building setbacks. This view is consistent with advice provided by the SDRP who noted that the quality, accessibility, and consideration of safety throughout the site, including the creek corridor are of high importance.

Response

Sympathetic or contextual fit and alternative designs

The design has been reconsidered with this submission. The updated design is more sympathetic to the site's surrounding heritage and the desired future character. The design now incorporates wide landscaped curtilages to protect sightlines to heritage cottages and the channel reserve. Large gardens are incorporated into the site that have been made accessible to the public to further enhance the local amenity.

The updated design has been developed through consultations with government agencies, stakeholders and in response to public submissions.

Please refer to section 1.1 of the design report. This document details the design development undertaken over the past 10 years, including the review of four different schemes. This process has led to the scheme submitted with this Response to submissions.

Non-compliant height – review 4.6

Appendix C provides a revised variation to development request.

The proposed development at Gregory Place seamlessly integrates with the character of Harris Park by harmonizing the preservation of its historical and cultural heritage with the growth of a vibrant, inclusive, and economically dynamic community. The design thoughtfully incorporates elements that foster a socially inclusive environment, encouraging long-term residency and strengthening community bonds. By offering affordable, accessible, and comfortable housing, the project ensures that individuals can thrive in the bustling

city of Parramatta, contributing to a lively and cohesive neighbourhood. The development respects the historical significance of the area, particularly the heritage items such as Hambledon Cottage and Experiment Farm, by maintaining appropriate setbacks and integrating landscape elements that enhance the visual and cultural experience. The project also emphasizes connectivity and accessibility, creating new pedestrian and cycle connections that link the site to the surrounding parklands and community facilities.

Overall, the development enhances the existing urban fabric and provides a high-quality living environment that aligns with the future character of Harris Park.

Long building lengths

The amended built form provides appropriate setbacks in all directions, as explained in Section 5 Design Framework of the Design report.

The revised structure of Block A, fronting Gregory Place, is segmented by the lane into shorter façades. Detailed design will incorporate building articulation to ensure a fine-grain character, aligning with the more residential nature of Gregory Place. These design concepts are captured in Section 8 Design Guidelines of the Design Guide.

Units facing each other

The central spaces between all unit blocks have been increased with considered landscaping introduced to create an environment where the buildings are placed within gardens, encouraging a pedestrianised environment that will improve the perceived separation between the buildings.

Key vistas in visual impact analysis

A revised VIA has been prepared by Tzannes (Appendix E). This document has carefully and holistically considered the visual impact of the proposal by firstly undertaking a visual survey to qualify the visual catchment of the proposal and surrounding Heritage and Cultural sites. This survey identified that the flat landscape and extensive existing built form and vegetation greatly impact visibility. Where visibility was identified, it was carefully considered by Tzannes and GBA to ascertain the importance and relevance of the view. This document now better considers key vistas including:

- Heritage views; section 2.7
- View corridors; section 2.7
- Visual markers between the nearby three heritage items; section 2.2 – 2.4
- Impacts to the setting of Hambledon Cottage ; section 2.2.
- Documents existing views; section 2.

Greater southern building setbacks

Please refer to section 3.4 of the design report. The analysis undertaken concluded that the pedestrian experience was enhanced by varying the setback from 6m to 45m, not including significant view and circulation landscaped connections to the park. It is also noted that the spatial width of the walkway is greater. The experience generated by the expansion and contraction generated by the built form, both existing and proposed, would not be improved over the proposal by a constant 10m setback.

The analysis resulted in a walk that is rich in experiences, moments and nodal points that engage with the whole of the site.

Issue: Heritage Review

The heritage review undertook a peer review of the submitted Statement of Heritage Impact (SHI), prepared by GBA Heritage and completed an independent heritage assessment of the project.

The peer review identified the following:

- *The SHI overlooked significant heritage impacts relevant to the views and settings of heritage items and instead focused on the retention of offsite physical elements.*
- *The SHI concludes that the 8 storey built form is not in keeping with the residential character and contemporary development in the locality. Assessing the project against the contemporary landscape does not accurately capture the significant historic cultural landscape that is characterised by three highly significant heritage items and an overall low-density character.*

The SHI has not demonstrated how the project is at a scale, height and bulk sympathetic to the existing character of the area. Further it has not accurately assessed the impact of the proposal on the setting of, and views to and from state heritage items.

The independent heritage assessment concluded that the project would impact upon the state heritage values of Hambledon Cottage and Experiment Farm cottage and would substantially impact on their setting. The assessment noted that the project is contrary to Article 8 of the Burra Charter which requires an appropriate setting for heritage items to be retained. The project does not allow for adequate separation between the buildings on the site and the adjacent heritage item and parklands, or for the appropriate treatment of their interface areas in order to mitigate these impacts.

Response

The updated statement of Heritage Impact concludes that the updated proposal achieves compatibility with the existing and desired future character of the Harris Park Precinct.

The three NSW State Heritage Registered heritage items in the vicinity of the subject site are Elizabeth Farm, Hambledon Cottage and Experiment Farm. The site is located within a spatial triangle delineated by these three SHR properties. The two Heritage Conservation Areas, which are at some distance, are the Elizabeth Farm HCA and the Experiment Farm HCA. All three SHR properties and the subject site are located at the southern end of the Harris Park Precinct, which extends north to the Parramatta River and the ridgeline beyond.

The entire extent of the updated proposed development is confined within its own site, while creating new opportunities to enhance the settings and public appreciation of the three historic properties by an updated design approach that includes through site pedestrian links along Clay Cliff Creek stormwater channel and larger setbacks to the adjoining Hambledon Cottage property.

The updated Statement of Heritage Impact does this by undertaking a more broadly based assessment of the historical processes from the previous 2022 SHI report. The phases of special importance in understanding the evolution of the Harris Park Precinct and its historic Colonial cottages, include:

- Evolution of Burramatta Country, Parramatta Township and modern City Centre.

- Evolution of the Harris Park Precinct, including development and communications corridors along the southern riverbank.
- Widespread subdivisions of the early, large scale Macarthur and Harris Estates in the late 19th century
- Channelisation of Clay Cliff Creek, opening up previously swampy northern areas of the Precinct for 20th century development
- Early 20th century residential development across the subdivided land parcels and streetscapes
- Development of public parklands and large-scale street tree planting
- The wider growth in Heritage Awareness
- The progressive strengthening of Heritage Protection for the Colonial cottages

Views and setting of heritage items

The updated design responds to concerns regarding views and settings by reducing building footprints, reconsidering building heights, increasing setbacks, and introducing landscape buffers—particularly around Hambledon Cottage and Experiment Farm Reserve.

These measures aim to reinforce the heritage context through sensitive built form placement and interpretative public domain strategies. Please refer to the Tzannes VIA.

Character

In response to concerns raised in the SHI, the built form has been reconfigured, particularly adjacent to heritage interfaces, and setbacks have been increased to minimise visual impact and strengthen the experiential quality of the interface. The design approach prioritises contextual sensitivity, reinforcing the heritage setting through landscape integration and modulated massing. Refer to Design Response to key issue ‘Height of buildings and Clause 4.6 request ‘ in regards to Channel Walk amenity, in Section 3.2 DPE Key Issues.

Refer to Section 2.3 Site Compatibility of the design report for overview of how the updated design is compatible with its context, and section 9 of the updated Statement of Heritage Impact for consideration of a site compatibility assessment.

Issue: Visual Impact analysis

1. *In addition to the viewpoints requested in the RtS letter to you dated 7 September 2022, provide a ‘Before and After’ visual analysis from the rear gardens and internal spaces within Hambledon Cottage. This is requested to assist the understanding of the amended project’s impact, or contribution to the heritage significance of Hambledon Cottage.*
2. *Provide a ‘Before and After’ visual analysis from the verandah of Experiment Farm Cottage where the existing industrial buildings are partly visible, as well as the grounds of Experiment Farm Reserve. This is requested as the submitted visual impact assessment looks toward Parramatta CBD instead of the heritage view corridor toward Hambledon Cottage in contrast to the heritage view corridors identified in the Parramatta Development Control Plan.*

Response

Whilst it is acknowledged that DPE has requested additional views be prepared, the Tzannes Visual Impact Assessment, as provided at Appendix E, has carefully and wholistically considered the visual impact of the proposal by firstly undertaking a visual survey to qualify the visual catchment of the proposal and surrounding Heritage and Cultural sites. This survey identified that the flat landscape and extensive existing built form and vegetation greatly impact visibility. Where visibility was identified, it was

carefully considered by Tzannes and GBA to ascertain the importance and relevance of the view. Those views, and the views identified in DPE’s letter and those raised by stakeholders have been considered in the revised VIA.

The previous Visual impact assessment, prepared by Taylor Brammer considered seven views,

- View 1 - Hassall Street looking south into Gregory Place 15
- View 2 - Hassall Street looking south to Hambledon Cottage 15
- View 3 - Parkes Street looking south to James Ruse Reserve 16
- View 4 - Parkes Street looking east to James Ruse Reserve 17
- View 5 - James Ruse Reserve within curtilage of Experiment Farm Cottage 17
- View 6 - Gregory Place from Swan Reserve looking west 18
- View 7 - Gregory Place from centre of street looking west

Rear gardens and internal spaces within Hambledon Cottage

Refer to the updated visual impact assessment prepared by Tzannes, specifically item 3.12, view number 11. The proposed envelope is largely screened by existing and proposed vegetation.

Veranda of Experiment Farm Cottage

Refer to the updated visual impact assessment prepared by Tzannes, specifically item 3.2 view number 1. Regarding the ‘view corridor’ towards Hambledon Cottage from Experiment Farm, we refer to the report prepared by GBA Heritage which identifies that this is not a significant view. The proposed envelope will not be visible from Experiment Farm but is visible from some locations within Experiment Farm Reserve.

It is noted that the analysis by GBA Heritage has identified that the genesis of the DCP view corridors is from a study undertaken in 1997. An aim of this study was to identify views out of and towards historical sites. This study did not consider the historical significance of the views. Regarding the DCP view corridor between Experiment Farm and Hambledon Cottage, Hambledon Cottage originally faced east, with its outbuildings at the rear facing Experiment Farm. Additionally, John Harris and John Macarthur had a bitter relationship, and Experiment Farm was not Harris’ initial choice, it is the view of GBA Heritage that there is not historical connection between Elizabeth Farm and Experiment Farm.

Furthermore, a review of the statement of significance for each heritage listed item shows that there is no mention of any physical or visual connection between these three heritage listed items and their grounds, contributing to their heritage significance. The commentary in relation to these three view corridors in that statement by GBA Heritage includes:

“The identified historic view corridor No.8 from Hambledon Cottage to Elizabeth Farm would have been lost by the 1950s due to the residential development along Alfred Street and Gregory Place. The identified “Historic View Corridors No 7 and 9 from Experiment Farm and Elizabeth Farm to Hambledon Cottage” by the 1997 study were described as being limited to the tall trees within the Hambledon Cottage property”.

Issue: Alternative Building Designs

3. *Additional alternative designs must be described and considered as part of the RtS and the preferred option justified.*

Response

The updated proposal presents another consideration of the site undertaken over the past 10 years as identified in section 1.1 of the design report.

As a direct response to the consultation undertaken and analysis of the submissions, the updated proposal prepared through a co-design framework by Tzannes and Yerrabingin, has established an evidence-based design process via a number of objects with include:

1. Integration of ‘Country’ in a co-design process to deliver community infrastructure guided by best practice planning and design.
2. Revitalisation of blighted area and establish an acceptable future urban character.
3. Create a new destination of enhanced cultural significance and a high standard of publicly accessible amenity.
4. Enhance appreciation, visitation and access to existing heritage and community facilities.
5. Enhance park access and amenity throughout the entire precinct.
6. Align with the distinctive characteristics of new developments and heritage in Parramatta.
7. Manage urban growth and infrastructure aligned with sustainable principles.
8. Provide affordable housing of high quality design, construction and amenity in the Parramatta area.
9. Creating a socially inclusive environment that fosters long-term residency and community connections.
10. Create a viable, affordable housing development.
11. Holistic consideration and responsiveness to community concerns.
12. Enhance the ecological value of the site by connecting extensive green spaces and natural elements.

These are established through a set of design guidelines, which are outlined under Section 8 of the attached design report. These design guidelines provide controls to establish footprints, open space, envelopes, setbacks, character statements, and specifically define heights through solar access planes. The methodology for the updated and revised controls is guided by compatibility, as discussed under Section 3 of this report.

This has lead to the updated proposal provided with this response to submissions.

Issue: Building A

4. *Consideration should be given to breaking up Building A into multiple buildings along with a reduction in the number of storeys to enable a more suitable transition from the lower density dwellings to the east. The reduction in height should be informed by a visual impact analysis and should result in a sympathetic transition to the desired 2-3 storey built form to the east. The breaking up of Building A into multiple buildings could enable the vehicle driveway to be re-located away from Hambledon Cottage to within the centre of the site and could provide greater internal amenity.*

Response

The revised structure of Block A, fronting Gregory Place, is segmented by the lane into shorter façades. Detailed design will incorporate building articulation to ensure a fine-grain character, aligning with the more residential nature of Gregory Place. These design concepts are captured in Section 8 Design Guidelines of the attached design report.

Issue: Building B

5. *A greater setback must be provided to Hambledon Cottage in order to reduce the impact on its setting. In order to achieve this, the Department recommends that the northern 4 storey portion directly behind the cottage be removed to provide a larger landscaped courtyard and greater internal amenity. A reduction in height of the remainder of the building is also advised. An appropriate height should be informed by a view analysis completed from within the grounds of and internally within Hambledon Cottage.*

Response

The revised scheme provides no built form, but a 30m wide publicly accessible Green Spine for the width of Hambledon Cottage, between the Cottage and OLOLC, establishing a new direct visual connection between Hambledon Cottage and the OLOLC.

A minimum 12m setback is provided to the boundary adjoining Hambledon Cottage, which is a 20% increase from the EIS scheme. This setback is a landscaped Shared Zone with two rows of large canopy trees, reinforcing a landscaped backdrop to Hambledon Cottage.

Two 2-4 storey east west built form lines this shared zone, providing a transition in height towards the Cottage. The first two levels are double storey terrace typologies to further reinforcing the datum from Cottage roof line.

Refer also to the VIA prepared by Tzannes (Appendix E, section 2.2).

Issue: Building C

6. *The height of building C is to be reduced to 4 storeys, or an appropriate height based upon revised visual analysis. Greater boundary setbacks to the south and west and additional articulation should be provided. This is requested in order to reduce the impact on the settings of the surrounding state heritage items and aid in the retention of trees.*

Response

The revised Block C is now part 4 storeys and part 6 storeys, with substantially increased setbacks. The EIS scheme was set back 5m from the western boundary, with the revised scheme set back a minimum 17.5 m from the western boundary and set back from Parkes Street by no less than 59m, creating parkland between Parkes Street and the built form on site. This mirrors the open space dimensions found elsewhere at Hambledon Cottage reserve.

The built form has been revised to feature a four-storey frontage facing west towards Experiment Farm and the landscaped Shared Zone. Generous landscape buffers with large canopy trees have been incorporated to screen the buildings from the reserve, enhancing the parkland setting of this area.

Issue: Channel walk

7. *Provide a greater southern boundary setbacks to the channel walk in order to provide greater amenity for its users and reduce overshadowing and conflict with Our Lady of Lebanon Church to the south.*

Response

Section 5 of the attached design report establishes the design approach of maintaining solar amenity to the southern properties, including the OLOLC childcare centre and Experiment Farm Reserve. This has resulted in the built form revised and shaped to respond to this constraint.

The separation to the channel at its minimum remains at 6m, however the study within section 5 of the attached design report identified that with the revised built form and modulation, the experience walking along the channel walk provides a variety of experiences and an enhancement of the connection of the channel walk within a network of open spaces. This revised design aims to offer a diverse range of spatial experiences along the walk.

Refer to Section 6 Concept Design – Landscape of the attached design report for more details on the channel walk design.

Issue: Basement setbacks

8. *The basement levels should be reduced in size to allow for greater tree retention and deep soil planting surrounding the buildings.*

Response

The basement footprint is confined to beneath and between the buildings, facilitating greater tree retention and deep soil planting around the structures. Due to the reduction in building footprint, there is an increase in deep soil across the site.

Refer Figure 133 Roof plan of the attached design report showing deep soil and constructed soil provisions for details.

Issue: SDRP Review

9. *It is highly recommended that the project be reviewed again by the SDRP as recommended in their last written advice dated 3 June 2022.*

Response

The updated proposal was presented to the SDRP on 3 April 2024. Section 7.3 of this Submissions Report addresses the comments raised from the presentation. Further, Section 3.5 of the attached design report also addresses the matters raised and recommendations in detail.

7.3 Consideration of SDRP comments/recommendations

The updated proposal was presented to the SDRP on 3 April 2024. Section 3.5 of the attached design report addresses the matters raised and recommendations in detail. This section summarises those responses.

The following features were supported by the SDRP:

- A robust Connecting with Country approach embedded with First Nations design principles.
- Increased diversity of building typologies, including lower scale buildings fronting Hambledon Cottage and taller buildings fronting communal courtyards.
- Improved layout of public open spaces, with stronger relationships to the local context.
- Improved connection between Experiment Farm Reserve and Hambledon Cottage Reserve through an increased setback to Parkes Street/Hassall Street.
- Increased connectivity across Clay Cliff Creek stormwater channel by introducing pedestrian bridges.
- The intent, subject to assessment, to incorporate non-residential uses on the ground floor to improve the activation of communal and public spaces. It is noted that this will need to be resolved with DPHI.

Issue: First Nations design principles

The established First Nations design principles provide the framework to develop a strong understanding of Country that can inform richer and more place responsive design solutions. The following is recommended:

1. *Continue to work with Yerrabingin to embed the established First Nations design principles into the design to demonstrate how:*
 - a. *engagement with Traditional Custodians has informed the design, such as the siting of precincts and buildings, connections, experience, materiality, landscape, water cycle and so forth*
 - b. *Traditional Custodians can feel welcome to gather, move through and practice culture in the public spaces; consider how groups of various sizes can operate in these spaces*

- c. *Country is embedded in the architectural and landscape response so that the design belongs to Country.*

Response

1. The revised design was established as a co-design process with Yerrabingin and Tzannes, which embed the established First Nations design principles into the design.

- a. Engagement with Traditional Custodians

The project team has benefitted from the inclusion of Yerrabingin as part of the team. A summary of the community engagement between the project team and local First Nations community members including Traditional Custodians, and how the community driven principles for connecting with Country are being explored within this stage of the project are outlined in the First Nations Design Principles section of the attached design report (Section 5).

- b. Welcome environment for Traditional Custodians

During the community engagement stage, the desire for the project to be a welcoming place for community to activate and utilise was a clear theme. Through the First Nations Design Principles, Landscape Strategies, Landscape Contextual analysis and Landscape Concept Design sections of the attached design report, exploration for how a diverse mix of culturally safe and inclusive design elements and spaces have been integrated into the project.

- c. Country is embedded in the architectural and landscape

Country is embedded in the architectural response as the proposal is now a co-design process with Yerrabingin.

The community drive connecting with Country design principles highlighted in the First Nations Design Principles have been integrated into the Landscape Strategies, Landscape Contextual analysis, Landscape Concept Design, Public Domain Strategies, Movement Strategies, Built Form Strategies and Concept Design – Architecture sections, demonstrating how the project is informed by and embedded in Country.

Landscape design guidelines ensure Traditional Custodians will feel welcomed to gather, move through and practice culture in the public spaces. Section 8 Design Guidelines of the attached design report specifies the provision of spaces for various group sizes.

Issue: opportunities for Country

2. Address the *following* opportunities for Country:
 - a. *provide site access for living cultural practices through the development staging and future public spaces, particularly practices that bring health back to Country – e.g., ceremony and traditional land management practices appropriate to the place*
 - b. *ensure that caring for Country is applied to the site's interconnected systems, such as water, ground water and soil as well as promoting rich connections with Sky Country through spatial design*
 - c. *view the project as a precedent for reviving and promoting the thriving of Burramattagal Country in the Harris Park area.*

Response

The project aims to set a precedent for reviving and promoting the thriving of Burramattagal Country in the Harris Park area. The attached Design guidelines (Section 8 of the design report) ensures the provision of site access for living cultural practices through the development and future publicly accessible spaces, particularly practices that bring health back to Country.

In terms of the opportunities for Country, the attached design report provides the following considerations:

Living cultural practices

Understanding Country as a living, breathing entity is key in the process of Designing with Country. Her health and wellbeing are impacted by the actions and by-products of human kin uses. The First Nations Design Principles, Landscape Strategies, Landscape Contextual analysis and Landscape Concept Design sections reveal the opportunities across the site for embedding caring for Country techniques and practices in the landscape.

Interconnected systems

Yerrabingin's methodology for connecting with Country involved a framework of the elements of Country. This network of lenses for viewing Country is explored in the First Nations Design Principles section has been integrated into the Landscape Strategies, Landscape Contextual analysis, Landscape Concept Design, Public Domain Strategies, Movement Strategies, Built Form Strategies and Concept Design – Architecture sections as a method of assessing the success of spatial design in connecting with Country.

The Concept design has developed an understanding of interconnected systems, with the guidance of Yerrabingin. The Connecting with Country design report has been embedded in the design. These documents consider these systems by considering how people, animals and water move through the site.

Reviving Burramattagal Country

Developments within Country are not isolated projects, but an interconnected system that reflect and impact not Country as a whole – at a broad context. The water story of our site engages with the wider catchment and impacts the Parramatta River, the Non-Human Kin dwell and migrate across the expanses of the area. It is this perspective of thinking and designing that is explored within the First Nations Design Principles, Landscape Strategies, Landscape Contextual analysis, Landscape Concept Design, Public Domain Strategies, Movement Strategies, Built Form Strategies and Concept Design – Architecture sections to (re)centre Country as a key design driver of this site – and inspire surrounding developments and neighbourhoods to do the same.

While returning the Harris Park precinct to a natural Burramattagal Country environment is not a realistic proposal at this time, understanding what that environment was and including key elements of it within the precinct is already supported by the Concept design. The design team is committed to continuing its analysis of Burramattagal Country and developing a scheme that will promote an understanding of it.

Issue: Clay Cliff Creek stormwater channel

The natural asset of Clay Cliff Creek stormwater channel traversing the site offers a significant opportunity to connect to the local water story of Country and celebrate the riparian ecology. However, the current site strategy does not adequately engage with this asset. The following is recommended:

Firstly, prior to any consideration of connecting Country with the Clay Cliff Creek stormwater channel, it is important to again clarify its context to the site and history. Clay Cliff Creek is not a natural asset. It is man-made.

The river valley landscape around the site has shifted and changed over thousands of years in relation to wider global climate changes. Around the time of European colonisation of the site, what is now the channelised Clay Cliff Creek stormwater channel was a chain of ephemeral freshwater ponds. As described in the 2025 Aboriginal Cultural Heritage Assessment Report prepared by Dominic Steele Consulting Archaeology:

Before the colonisation, watercourses were discontinuous chains of ponds and wetlands that relied on heavy rain to overflow the ponds and join them into a stream. The ponds drought-proofed the land by keeping water available for plants, animals and people. Settler activity disrupted this by draining the wetlands, clearing vegetation, grazing sheep and cattle and introducing rabbits. These activities caused rain to bite into watercourses, converting the chains of ponds into continuous streams in incised channels up to 15 metres deep, with water draining quickly away.

It is likely the landscape between Clay Cliff Creek and the Parramatta River had uneven and low-lying surface topography that features chain of ponds drainage and swampy meadows formation vegetation and ecologies.

The access to fresh water that would have made it a suitable location for the establishment of the early colonial agricultural projects in the area would also have made it a valuable place for Burramattagul people pre colonisation. The historic chain of ponds was replaced by a new stormwater channel, removing traces of the pre-colonial life on Country. For this reason, the Statement of Heritage Impact, and other reports, refer to this watercourse as a ‘stormwater Channel’.

Other matters raised in relation to the Stormwater Channel are considered below:

Response

Comment	Design Response
3. Explore ways of restoring Clay Cliff Creek into a natural state, with shallow, vegetated banks, areas for water to pool and space for users to access the waterway. If restoration cannot be achieved at present, waterway setbacks should be generous enough to ensure that future restoration can occur.	The Concept design identifies there is a wider opportunity in Parramatta to restore Clay Cliff Creek to a more naturalistic state, noting that its original formation was as a chain of ephemeral ponds. It is essential to note that the channel is a Sydney Water asset. Any work in the Sydney Water easement would need to be undertaken in collaboration with Sydney Water and as a wider Parramatta approach. We also note that Sydney Water currently has stringent conditions governing work on its assets. However, the Channel walkway has a variety and number of setbacks that range from a minimum of 6 metres upwards. This provides a variety of opportunities to create different spaces and landscapes throughout the corridor, as identified by the landscape strategy and the design report.
4. Demonstrate how the proposed creek setback will provide adequate space for people to dwell and engage with the waterway, including spaces to sit, gather and connect with the environment.	The proposed creek setback provides adequate space for people to dwell and engage with the waterway, including spaces to sit, gather and connect with the environment. Refer to attached landscape and design strategies included within the design report.
5. Investigate the removal of fences/barriers along the creek corridor to improve physical and visual connectivity to the waterway.	We have received clear advice relating to the water course from Sydney Water: “The proponent is required to provide the fencing arrangement along Sydney Water’s stormwater assets. Any fence other than 1.2m high pool fencing, 1.8m high colour bond fencing or equivalent should be located at least 1m away from the outside face of the stormwater channel/ asset and supported on piers and piers are to

Comment	Design Response
	<i>be extended at least 1m below the invert level of the stormwater channel or 1m below the zone of influence of the stormwater channel.”</i> In subsequent stages of the design, we will attempt to work with Sydney Water with the intention of developing a more open connection to this waterway.
6. The walk along Clay Cliff Creek is intended to form the primary pedestrian connection between Experiment Farm and Elizabeth Farm, two low-scaled structures within landscaped settings. Demonstrate how the proposed walkway along the creek will deliver an appropriately scaled, landscaped user experience that can create a logical and meaningful physical connection between these two heritage assets in accordance with the Site Compatibility Certificate.	Refer to item 6.4.1 in the design report. The proposed walkway along the creek will deliver an appropriately scaled, landscaped user experience that can create a logical and meaning physical connection between the two heritage assets and the wider precinct in accordance with the SCC.
7. Provide greater detail on the landscaping, access and user experience of the southern creek bank, in the south-west corner of the site, acknowledging challenges such as the steep topography and isolation from the greater site area to the north of the creek.	Refer to Section 6 of the design report. Greater detail is provided on the landscaping, access and user experience of the southern creek bank, in the south-west corner of the site, acknowledging challenges such as the steep topography and isolation from the greater site area to the north of the creek.

Issue: Site Strategy and Landscape

As articulated by the design team, the landscape strategy has the potential to better relate to the surrounding public spaces and create a thriving habitat for human and non- human kin. As yet, there is currently insufficient detail as to how users will access and move through the precinct and missed opportunities to embed natural systems throughout. Consider the following recommendations during design development:

Response

Comment	Design Response
8. Indicate how the site strategy and building layout will create an intuitive arrangement of publicly accessible spaces with strong visual links to one another. This should include clarity on site access and connections to adjoining parks and streets, as well as internal circulation and public accessibility.	The building layout follows the orthogonal grid pattern to the south of the site, responding to the strength of the 19th century grid pattern of the surrounding locality and adjacent HCAs. A network of open spaces is created, with a central public spine. A secondary green spine links the landscaped Shared Zone on the north to the channel walk on the south. Publicly accessible Lanes are provided in addition to this to further improve site permeability from Gregory Place.

Comment	Design Response
	Refer to section 6 of the design report which identifies the extent of publicly accessible space across the site.
9. Provide more detail on the location and configuration of the proposed bridges across Clay Cliff Creek, in particular: a. clarify the integrated accessibility strategy for all proposed creek crossings– the eastern bridge is currently shown as having a lift on the northern side, but stairs on the southern side b. provide more detail on the role and function of the western bridge – the current location of the bridge does not align with existing or proposed connections.	Indicative locations for the proposed bridges are noted on plans and specified in the design guidelines. However, it is noted that the Clay Cliff Creek stormwater channel is a Sydney Water asset within a Sydney Water easement. As such any crossing of the channel can not be created without the support of Sydney Water. If Sydney Water does support the creation of this infrastructure it is expected that the crossings would be created so that they are accessible. Exactly how this is achieved would be clarified as part of the more detailed design process, and noting that the application is for a concept at this stage.
10. Ensure there is a clear delineation between public and private spaces embedded within the site strategy and landscaping, with minimal use of fences.	A clear delineation between public and private spaces is embedded within the site strategy and landscaping, with minimal use of fences.
11. Maximise deep soil and permeable surfaces, to ensure connected soil networks across the site and to adjoining areas. Consider soil quality and health throughout design development.	Deep soil and permeable surfaces are maximised to ensure connected soil networks across the site and to the adjoining areas. Soil quality and health is considered throughout design development.
12. Explore how new and improved habitat and green spaces can connect to surrounding habitats and green spaces. Particular focus should be given to how the site will fit into the wider Sydney green grid to further develop this asset. Refer to the Sydney Green Grid strategy on the GANSW website for further information.	Opportunities to connect new and improved habitat and green spaces to surrounding habitats and green spaces are explored, as demonstrated on section 5.2 of the design report. Particular focus was given to how the site will fit into the wider Sydney green grid to further develop this asset.

Issue: Building Massing and Amenity

The location of the site between three noteworthy heritage buildings necessitates a nuanced design response that sits comfortably in this significant historic cultural landscape. The revised heights, massing and layout lack necessary detail to communicate the design strategy with regards to how it responds to this context. The following is recommended:

Response

Comment	Design Response
13. Provide greater detail on the layout and design strategy behind the configuration of the buildings, including:	Greater detail on the layout and design strategy behind the configuration of buildings are provided in Section 7 Concept Design – Architecture of the attached design report.

Comment	Design Response
a. site circulation and movement diagrams, entry locations, and public and private spatial planning at ground level	Please refer to section 6.1 of the Tzannes design report. In particular, Section 6.1.3 addresses accessibility and circulation.
b. the exact heights (RLs) of the proposed envelopes, ensuring heights have adequately accommodated flood planning levels, optimal floor to floor heights, plant/lift overruns and the proposed communal roof gardens and green roofscapes	Please refer to section 7 of the Tzannes design report. Both the roof plan and sections include specific envelope heights with RLs.
c. overshadowing analysis of Experiment Farm, the adjoining childcare centre (Young Academics Early Learning Centre – Harris Park), surrounding and proposed public open spaces	Refer to section 7.4.2 of the attached design report. It is noted that <i>the DPIE Child Care Planning Guideline requires not less than 30% (or 2.1m²) per child to have a minimum of 2 hours of solar access between 8am and 4pm during winter. According to ACEQA, this childcare centre has 75 approved places, requiring solar access to at least 158m². The shadow diagrams show this is clearly achieved between 10am and 2pm on 21 June.</i>
d. development metrics, including dwelling numbers, dwelling mix, car and bicycle parking, compliance with SEPP 65 (refer to the Apartment Design Guide for guidance), basement layout, non-residential floor space and so forth.	Section 7 includes the analysis of the concept design, including indicative yield (320 units) and compliance with the ADG and former SEPP 65 requirements.
14. Provide visual analysis illustrating the proposed building envelopes from surrounding public spaces and key vantage points. Particular detail is required in regard to views to and from Hambledon Cottage, Experiment Farm and Elizabeth Farm. Refer to the identified view corridors in Figure A1.1.1 – Historic view corridors of the Parramatta DCP 2023.	Please refer to the Visual Impact Assessment prepared by Tzannes. Whilst this document includes a particular focus on views to and from Hambledon Cottage, Experiment Farm and Elizabeth Farm, the Tzannes Visual Impact Assessment, as provided at Appendix E, has carefully and wholistically considered the visual impact of the proposal by firstly undertaking a visual survey to qualify the visual catchment of the proposal and surrounding Heritage and Cultural sites. This survey identified that the flat landscape and extensive existing built form and vegetation greatly impact visibility. Where visibility was identified, it was carefully considered by Tzannes and GBA to ascertain the importance and relevance of the view. Those views, and the views identified in DPE's letter and those raised by stakeholders have been considered in the revised VIA. It is noted that the analysis by GBA Heritage has identified that the genesis of the DCP view corridors is from a study undertaken in 1997. An aim of this study was to identify views out of and towards historical sites. This study did not consider the historical significance of the views. Regarding the DCP view corridor between Experiment Farm and Hambledon Cottage, Hambledon Cottage

Comment	Design Response
	originally faced east, with its outbuildings at the rear facing Experiment Farm. Additionally, John Harris and John Macarthur had a bitter relationship, and Experiment Farm was not Harris' initial choice, it is the view of GBA Heritage that there is not his or social connection between Elizabeth Farm and Experiment Farm. Furthermore, a review of the statement of significance for each heritage listed item shows that there is no mention of any physical or visual connection between these three heritage listed items and their grounds, contributing to their heritage significance.

Issue: Sustainability and climate change

With the majority of the site already flood affected, the changing climate poses a significant risk to the resilience of proposed scheme and safety of future visitors and residents. As yet, the design response lacks sufficient detail in incorporating sustainability initiatives and mitigating against the adverse impacts from increasing natural hazards. The following is recommended:

Response

Comment	Design Response
15. Ensure the design of buildings, public and communal spaces are resilient to flooding.	The design of buildings, public and communal spaces are resilient to flooding. The communal spaces only start to become flooded in the 1% AEP event and in this event the hazard is H1 or H2 (low hazard). Structural considerations will be addressed separately by a structural engineer. Please refer to Appendix O - Flood Emergency Response Plan for more details.
16. Demonstrate how residents and visitors are safe from hazardous flooding conditions.	A FERP has been developed that indicates that ample refuge is available for sheltering in place protected above the PMF level. Advanced warning is also available due to the Flood Smart warning system that operates in this catchment. Operation measures have been recommended so as to separate all occupants from flooding well in advance of flooding impacting the site. Please refer to Appendix O - Flood Emergency Response Plan for more details.
17. Demonstrate how sustainability initiatives are integrated into the site planning and design of buildings, including opportunities for well-integrated Country narratives.	Sustainability initiatives are integrated into the site planning and design of buildings, including opportunities for well-integrated Country narratives. Refer to the attached updated ESD Report prepared by SLR. Strategies that will be pursued include: • Natural cross ventilation opportunities • Solar access to residential units • Thermal mass heat storing • LED lighting to reduce power consumption • Centralised hot water system • Low water consumption fixtures • Low VOC paints and floor coverings • Indigenous species plant selection

Comment	Design Response
	PV array on rooftops
18. Illustrate how the project will contribute to NSW's Net Zero emissions goal by 2050. Refer to 'NSW, DPIE, Net Zero Plan, Stage 1: 2020-2030' for further information.	The project will contribute to NSW's Net Zero emissions goal by 2050. The project provides high-density housing at a location well serviced by public transport, maximising land use efficiency and helps to reduce urban sprawl. It encourages the use of public transport which may significantly lower green house gas emissions compared to car usage. Refer Appendix I – updated ESD Report for more details.

Issue: Relevant SDRP 01 and SDRP02 Issues

Advice from SDRP01 and SDRP02 still applies and should be addressed as the project progresses. The following commentary provides additional advice and recommendations for the design development of the project:

Response

Comment	Design Response
19. Undertake further analysis and overlay of the landscape, Colonial and multicultural layers and demonstrate how these are meaningfully informing the design in accordance with the SCC requirements.	The design team has reconsidered the design from first principles. A thorough review of the precinct and history of the area has been considered in the reimagining of the development. Refer Section 4 Reanalysing Place and Section 5 Design Framework of the Design report for details.
20. Demonstrate how the development itself and individual main entries will be welcoming, legible and clearly identifiable (aka the 'pizza test'). This should include drawings illustrating typical pedestrian approaches and routes to all entrances to buildings and the site generally.	The development itself and individual main entries will be welcoming, legible and clearly identifiable, as illustrated in Section 7 Concept Design - Architecture and defined in Section 8 Design Guidelines of the attached design report.
21. Clarify how the build to rent and affordable housing apartments will be dispersed throughout the development in an equitable manner.	It is clarified that the entire development is proposed as build to rent. Noting this is a concept application, the detailed development application will incorporate a social impact assessment identifying the housing typology demand for the affordable housing portion.
22. Provide schematic elevations of all buildings sufficient to explain the proposed building designs (include where appropriate distribution of materials, façade articulation, solid and voids, balconies, planting etc.).	Refer to the design report; Elevations are provided at 7.3.1 North and South Elevations and 7.3.2 East and West Elevations. The level of detail with the prescription of materiality, façade articulation, balconies and the like will be appropriately considered in the detailed design development application, guided by the design guidelines on section 8 of the design report.
23. Demonstrate through 3D visualisations the spatial quality and pedestrian experience from	3D visualisations are provided to demonstrate the spatial quality and pedestrian experience from within the

Comment	Design Response
<i>within the landscape open spaces and throughout the ground plane. Illustrate the scale and architectural expression of the built forms and how they integrate with the landscape.</i>	landscape open spaces and throughout the ground plane. The visualisations illustrate the scale and architectural expression of the built forms and how they integrate with the landscape. Refer 7.7 Photomontages of the Design report for visualisations.
<i>24. Provide analysis drawings of the existing trees to be removed and trees to be retained overlaid with the proposed built forms. Demonstrate how minimising tree removal has influenced the location of the built forms.</i>	The attached design report Section 4.5 Keeping Key Trees provides the analysis and 6.1.5 Tree Retention & Removal shows existing trees to be removed and trees to be retained overlaid with the proposed built forms. The reconsidered built form has ensured the retention of high importance trees on site.

7.4 Consideration of City of Parramatta Council submission

Issue: Flood impacts

1. *The proposal is not supported by Council as there are considered to be flood impacts contrary to the Floodplain Development Manual and NSW Flood Policy.*
 - (i) *Council notes that there are significant differences in the submitted flood study compared to the Council's adopted flood study.*
 - (ii) *The site is classified as a High Hazard Flood area.*
 - (iii) *Modelling needs to be reworked to include a blockage factor, overland flow and climate change.*
 - (iv) *a 500mm freeboard is not considered to be acceptable.*
 - (v) *a Riparian Corridor Study is required.*

Response

Council's adopted flood study - Council notes that there are significant differences in the submitted flood study compared to the Council's adopted flood study.

We note that this comment was made to the EIS submitted flood modelling, which has been substantially updated for this RTS.

In 2024 the Parramatta River Flood Study (PRFS) was adopted by council and released. Prior to that time council would not provide the model or levels from the PRFS. The project flood engineer; GRC Hydro requested and obtained PRFS design flood levels for the subject site from council. GRC Hydro subsequently obtained the PRFS Clay Cliff Creek model. On review the model was found to contain errors. These errors mean an incorrect design flow is being used. GRC Hydro's review identifies that the council flood certificate appears to be based on this erroneous modelling. Further discussion of this issue can be found in GRC Hydro's updated Flood Assessment.

There are numerous issues in the PRFS Clay Cliff Creek model, which make it unsuitable for use.

- Duplication of inflows at sub-catchment LP1.19b, which has applied the total flow from the hydrologic model although not being situated at the upstream boundary of the hydraulic model.
- The creek segment between Hassall St and Alfred St was modelled in the 2D domain, which has resulted in the underestimation of the flow conveyance of the channel in the vicinity of the site. GRC's model instead incorporates detailed survey received in August 2024 in order to model the

open channel in the 1D domain, which has significantly reduced the out-of-bank flows impacting the site.

- The pedestrian footbridge on Clay Cliff Creek immediately upstream of the site was modelled as having a closed cross-section and creates a large energy loss to the hydraulic model. This was deemed inaccurate since the structure doesn't include piers and the soffit and deck are situated well above the open channel.

It is noted that if the correct flows are incorporated into councils model, the GRC Hydro model identifies higher flow than council.

Site classification - The site is classified as a High Hazard Flood area.

On the contrary, Figures 5, 8, 11 and 14 of the updated Flood Assessment shows the site as well as Gregory Place to have hazard H1 in the 5% and 1% AEP events, with the high hazard being contained to the open channel area only. In the PMF, Gregory Place is predominantly H3, the raised area of the development is mainly H1, while lower-lying areas of the built-form have hazard ranging from H3 to H5.

In addition, GRC Hydro has prepared a Flood Emergency Response Plan (FERP) which can be found at appendix O.. The document details response strategies that have been adopted. The document details that both the Parramatta River catchment and Clay Cliff Creek catchments are not large and so event duration will be relatively short. This means floods will rise quickly but also recede quickly. The short duration nature of flooding at the site lends itself to residents remaining in place until the hazard has passed.

Blockage factor - Modelling needs to be reworked to include a blockage factor, overland flow and climate change.

- Stormwater pits and pipes were assumed as 100% blocked. The Alfred St crossing, as discussed in Table 1 above, adopts a 10% blockage factor.
- Climate change has been considered by accounting for 0.9 m increase to the fixed tailwater level and a factored rainfall increase of 19% above the 1% AEP.
- Overland flow flooding has been incorporated into the TUFLOW model as per the following:
- South of Clay Cliff Creek applies inflows from a WBNM hydrologic model.
- North of Clay Cliff Creek uses the rainfall- on grid modelling approach, with the primary objective of accurately assessing the potential impacts of the proposed development on Hambledon Cottage.
- For comparison, the PRFS 2024 study did not consider blockage.

Freeboard - a 500mm freeboard is not considered to be acceptable.

The freeboard provided by the proposed development is well above 500 mm.

The Finished Floor Level of the proposed development's ground floor is 6 mAHD. This is approximately 1 m above the 1% AEP. Or one half metre higher than standard residential FPL in NSW of 1% AEP plus 500 mm.

Notwithstanding the above, the freeboard of 500 mm reflects guidance outlined in the Parramatta DCP 2023 and is perfectly adequate for the site given it is unaffected by mainstream flooding and Clay Cliff Creek flooding, with its limited catchment and wide floodplain at subject site, does not scale. The Novus BTR SSDA which is less than 500 m upstream on the Clay Cliff Creek was approved to use a 500 mm freeboard.

Riparian Corridor Study - a Riparian Corridor Study is required.

The development is exempt from requiring approval for works within waterfront land, as Clay Cliff Creek is a ‘fully concrete lined’ watercourse, under Part 2 Schedule 4 Clause 28 of the Water Management (General) Regulation 2018.

Clay Cliff Creek, a ‘fully concrete lined’ watercourse, traverses through the southwest section and along the southern boundary of the concept SSD property. The concept SSD would include development approximately 5m distance from the Clay Cliff Creek high-bank level. Therefore, a proportion of the proposed SSD will occur within 40m of the high-bank and as such is considered ‘waterfront land’ under the WMA 2000.

The Water Management (General) Regulation 2018 specifies a number of exemptions. Clause 42 states:

“A person (other than a public authority) is exempt from section 91E(1) of the Act in relation to controlled activities specified in Part 2 of Schedule 4 that are carried out in, on or under waterfront land.”

the Act refers to:

“the Water Management Act 2000.”

Clause 91E (1) of the Water Management Act 2000 No 92 states:

“91E Carrying out controlled activity without, or otherwise than as authorised by, a controlled activity approval

A person—

who carries out a controlled activity in, on or under waterfront land, and

who does not hold a controlled activity approval for that activity, is guilty of an offence.”

Part 2 Schedule 4 of the Water Management (General) Regulation 2018 defines the controlled activities exemptions. Clause 28 relates specifically to Activities on waterfront land if river is concrete lined or in pipe, which states the following exemption:

“Any activity carried out on waterfront land relating to a river where the channel of the river is fully concrete lined or is a fully enclosed pipe channel.”

This clause provides an exemption to the “Controlled Activities” in the Water Management Act 2000, including the requirement for a Riparian Zone Management Assessment.

Issue: Built form

2. *The built form of the proposal and its heritage relationship to Experiment Farm, Elizabeth Farm and Hambledon Cottage and the surrounding context in Gregory Pl cannot be supported. The proposal does not adequately respond to this important heritage and low scale residential context, the unique site characteristics, streetscape and existing and future character of the locality.*

Response

The updated design has been developed through a co-design process involving Tzannes, Yerrabingin, and GBA Heritage, with input from the Heritage Council of NSW and Heritage NSW. The built form has been significantly reduced in scale adjacent to Hambledon Cottage and Experiment Farm, with building heights lowered to 2–4 storeys in these sensitive areas. Setbacks have been increased to create a landscaped shared zone, enhancing the setting and visual prominence of the heritage items.

The updated Statement of Heritage Impact has considered the updated proposal and concluded the following.

- The updated proposed development will provide an opportunity to connect with and regenerate country. The updated proposed development is founded on First Nations values, engagement, and place analysis. By incorporating First Nations values and engagement, the updated proposed development will add a new pre-Colonial interpretative context to the Harris Park Precinct and

the heritage listed items in the locality. The updated proposed development will enhance the existing cultural significance of the precinct by integrating pre-Colonial and contemporary multi-cultural design elements.

- Being occupied by a disused industrial building that does not contribute to the Harris Park Precinct and locality, the updated proposal includes the removal of the redundant factory after 75 years to release new opportunities for the setting and public connectivity, views along the south side of Hambledon Cottage, upgrade Clay Cliff Creek escarpment and improved direct access between Elizabeth Farm and Experiment Farm. Thus, the updated proposed well-designed development will enhance the relationship of the subject site with the heritage listed items in the vicinity and with the wider locality, and will contribute to the understanding of the place and its historical significance through a wider lens.
- The updated proposed development will create three built zones including Gregory Place, Community Hub, and Parkland Setting, each of which will reflect their distinct identities shaped by their settings. The updated proposed development has been carefully designed and distributed within the subject site to reduce any adverse heritage impact on the heritage listed items in the vicinity, and the residential character of the Harris Park locality.
- The updated proposal will have a positive impact on the subject site, the heritage items in the vicinity, and the Harris Park Precinct.

Issue: Archaeology

3. *The archaeological potential of the site has not been properly determined and is likely to conflict with the proposed basement which is significant in size.*

Response

We acknowledge council's concern that the proposed basement may conflict with the archaeological potential of the site. However, the nature of the existing constraints at the site restrict the opportunity for undertaking archaeological testing at the site at this time. The site is occupied by buildings that will need approval for demolition and below the factory buildings there are deep construction fills (c. 1.5m thick) that will also need to be removed to enable historical archaeological testing of the site to be undertaken. There is also potential for the construction fills and also for natural alluvial sediments beneath them to be contaminated. Soils currently pose a health and environmental risk to physical archaeological investigation and the issues need to be resolved before testing at the site can be safely undertaken.

We believe our assessment of the archaeological potential of the site is accurate. The first building on the site was a cottage that was constructed in 1854, and its precise demolition date is unknown but predates the c.1917 construction of the section of the Clay Cliff Creek stormwater drain that crosses the site. The open stormwater channel at the site is 6m wide and 3m deep from ground level and has significantly truncated the 1950s ground levels by about 1.5m.

Our predicted former location of the cottage is the only specific location on site where potential historical archaeological relics are suspected to occur. Testing to establish if relics are present in the location (and elsewhere across the site) requires approval to demolish buildings and remove fills. At this time, we do not believe substantial archaeology related to the cottage or any other unknown structure or undocumented historical activity is likely to be present and survive below the depth of excavation for the factory and adjacent stormwater drain footprints.

No State significant relics are expected to be present on the site. Archaeological evidence of mid-century brick dwellings that can/does survive demolition include building footings (stone/brick), internal subfloor occupation deposits, wells/privies, garden rubbish pits, post holes from fence lines, and drainage control

features etc. From our analysis of the deep impacts that have resulted from past building (factory and stormwater), no underfloor deposits associated with the former cottage are expected to survive and there is also a low potential expected for the survival of basal brick/stone footings.

We propose that the future identification of the presence of relics on the site can be achieved through archaeological monitoring and recording of earthworks following building demolition and any relics identified will be salvaged through archaeological excavation before development.

The proposed steps in management for the site are to evaluate the findings of contamination assessments and building demolition planning when information is available and development of an archaeological monitoring approach and salvage excavation methodology that is based on environmental assessment results and demolition planning.

Issue: Height variation

4. *The proposed 6-8 storey building height dwarfs Hambledon Cottage and the existing surrounding context in Gregory Place. The proposed 67% variation to the Parramatta LEP Height Control of 9.2m is not supported.*

Response

The design has been reviewed and updated from a comprehensive first principles approach to respond to concerns around the height of buildings, the character of the area, overshadowing of the adjacent childcare

as well as addressing privacy issues and heritage impacts to nearby heritage items including Hambledon Cottage and Experiment Farm. Key design updates are outlined in Section 1.4 of the design report; Key Design Updates.

- Overall building footprint has been reduced by over 1,000m² (14%), especially at Building C, to provide more publicly accessible open space across the site and a parkland setting linking Experiment Farm to Hambledon Cottage.
- Building heights have been reduced and redistributed to provide a variety of heights, appropriately scaled to their immediate context and adjacencies. Further detail can be referred to in 5.4 Built Form Strategies.
- A 30m wide open green corridor has been introduced and building height in front of the childcare has been reduced based on solar studies (Solar Amenity and Solar Access Plane in 5.2 Public Domain Strategies) to ensure compliance with required childcare solar access standards. Further detail can be referred to in and 7.4.2 of the design report; Shadow Diagrams.
- This reduction, along with the use of non-accessible green roof tops, building separations and vegetated buffers, ensures a balanced privacy outcome for childcare, OLOLC and current and future residents. Further detail can be referred to in 4.7 of the design report; Safety and Privacy and 5.4 Built Form Strategies.
- The updated design respects the historical significance of the area, particularly the heritage items such as Hambledon Cottage and Experiment Farm, by increasing setbacks, reducing building heights and integrating landscape elements that enhance the visual and cultural experience. Refer to updated Statement of Heritage Impact for detailed response by GBA Heritage.

Issue: Site planning and setbacks

5. *The proposed site planning results in the impression of a private gated estate which impacts unacceptably on heritage views. Setbacks to key interfaces are insufficient and the interface with Clay Cliff Creek is poor.*

Response

The site has been reimagined, creating large public and community gardens between the buildings, linking Clay Cliff Creek stormwater channel, Hambledon Cottage and the adjacent reserve. The design ensures that the channel walk receives sunlight during key parts of the day, particularly from morning to the early afternoon. This is achieved by varying the width of the channel walk, which ranges from approximately 6 meters to wider sections between key landmarks. This variation allows for different spatial experiences and ensures that certain areas receive more sunlight than others.

Issue: Basements and flooding

6. *Basements must not cover the entire site and should be located beneath the building footprint only. Basements may well not be a suitable design solution given the site's flood affectation, including the need to plan for the PMF.*

Response

The area of the basement has not been relegated to being under built forms only. By creating a single basement, there is the requirement for only one entry. This in turn provides greater opportunity for a pedestrianised zone at ground level.

The extent of basement parking has been reduced as part of the updated proposal.

The basement access is designed to have passive protection to a freeboard above the 1%ARI flood level, and is mechanically protected to the PMF, consistent with developments with basement parking across the Parramatta CBD which is subject to flooding.

The basement will be flood protected passively to above the 1% AEP level with additional flood protection to the PMF level via active flood gates (specific details to be confirmed during detailed design).

Issue: Parking

7. *Noting the objection to the scale of the proposed development overall, the proposed parking rate, whilst compliant with the minimum rates required under the Housing SEPP is considered an oversupply. Were the proposal to be approved at this scale and density, parking provision should be restricted to a maximum of 242 residential parking spaces and 68 visitor parking spaces in order to minimise the site's traffic generation and its impact on the operation of the surrounding road network.*

Response

Please refer to sections 4.3 and 5.2 of the Transport and Accessibility Impact Assessment prepared by SCT consulting. The new proposed parking complies with relevant controls and documents. Parking demand analysis shows appropriate parking provision based on car ownership data. No significant impacts on on-street parking in the area are expected.

The development proposes to provide a total of 386 car parking spaces, with 296 spaces allocated for residents and 90 spaces for visitors, retail uses, and car share.

Issue: Tree protection

8. *There is inadequate setback and tree protection given to a group of significant trees located in the north western corner and along the western side. The proposed setback of 6m is insufficient to enable retention of these trees.*

Response

The updated design has increased the setback of the built form from the northern boundary, from the EIS scheme with a 6m setback at the northwestern corner, to the revised scheme with a minimum 12m and extending to approximately 38m at the northwestern corner.

Issue: Visual impact

9. *The proposal will have significant visual impact on the heritage parkland and will likely increase recreational demand on the adjoining Hambledon Cottage and Experiment Farm reserves to a level that will compromise active and passive recreational experiences for users.*

Response

The Tzannes Visual Impact Assessment, as provided at Appendix E, has carefully and wholistically considered the visual impact of the proposal by firstly undertaking a visual survey to qualify the visual catchment of the proposal and surrounding Heritage and Cultural sites. This survey identified that the flat landscape and extensive existing built form and vegetation greatly impact visibility. Where visibility was identified, it was carefully considered by Tzannes and GBA to ascertain the importance and relevance of the view. Those views, and the views identified in DPE's letter and those raised by stakeholders have been considered in the revised VIA.

The proposed revised massing has been led by the design framework established in section 5 of the design report to create an appropriate design response that does not compromise on the active and passive uses. The new VIA provides a more comprehensive review of heritage views and view corridors. The following comparative views are detailed:

- Comparative View 1 - DCP Historic View Corridor 7
- Comparative View 2 - DCP Historic View Corridor 8
- Comparative View 3 - DCP Historic View Corridor 9
- Comparative View 4 - Experiment Farm Reserve Looking Northeast
- Comparative View 5 - Experiment Farm Reserve Looking East
- Comparative View 6 - Hambledon Cottage
- Comparative View 7 - Hambledon Cottage
- Comparative View 8 - Hambledon Cottage
- Comparative View 9 - Hambledon Cottage
- Comparative View 10 - Hambledon Cottage
- Comparative View 11 - Hambledon Cottage
- Comparative View 12 - OLOLC Grounds
- Comparative View 13 - OLOLC Grounds
- Comparative View 14 - Heritage Walk - Purchase St view of Hambledon Cottage
- Comparative View 15 - Heritage Walk Experiment Farm Reserve view to Site
- Comparative View 16 - Heritage Walk Alfred St view to Site

- Comparative View 17 - Heritage Walk Swann Reserve view to Site
- Comparative View 18 - Heritage Walk Gregory Place view to Site
- Comparative View 19 - Heritage Walk Hassall St view to Hambledon Cottage
- Comparative View 20 - Heritage Walk Hassall St view to Site
- Comparative View 21 - Heritage Walk Reserve View to Site
- Comparative View 22 - Alfred St Looking to OLOLC
- Comparative View 23 - Corner Hassall and Alfred St Looking to OLOLC
- Comparative View 24 - Corner Hassall and Gregory Place Looking to Hambledon Cottage
- Comparative View 25 - Gregory Place Looking to Site
- Comparative View 26 - Hassall St Looking to Site
- Comparative View 27 - Ruse St Dwelling to Site
- Comparative View 28 - Oak Street
- Comparative View 29 - Intersection of Alfred and George Street
- Comparative View 30 - Purchase Street
- Comparative View 31 - Purchase Street

7.4.1 City of Parramatta Council detailed comments

Issue: Flooding

The site is subject to significant inundation and high hazard conditions, representing a significant risk to life of residents from flash flooding. The proposal must be substantially reviewed to reduce this risk - if this is even possible. The proposal is not supported by Council in accordance with the Floodplain Development Manual and NSW Flood Policy. Council notes that there are significant differences in the submitted flood study compared to Council's adopted flood study. Council cannot vouch for or endorse the accuracy of the submitted flood study and given the difference, Council remains concerned that the proposal has not adequately assessed or responded to flood risk.

Following a high-level review of the submitted flood study in the given timeframe the following comments and recommendations are provided:

Please refer to the GRC Hydro Flood Emergency Response Plan (FERP) (appendix O). We note that the site is not subject to significant inundation or high hazard conditions during the 1% ARI event. It will only be subject to flooding in events rarer than the 1% AEP. The FERP has been prepared in accordance with:

- Parramatta Local Environmental (LEP) (2023) Section 7.11;
- Parramatta Development Control Plan (DCP) (2023) Section 5.1.1 Flooding

The Australian Disaster Resilience Handbook (Manual 20) notes that in areas subject to flash flooding “it may be more dangerous for people to evacuate than to shelter in place”. Furthermore, the Draft Shelter-in-place guideline notes that a shelter in place response is appropriate where “flood warning time and flood duration are less than six hours”.

The proposed development finished ground floor level (6 m AHD) lies above the 1% AEP flood level (6 m AHD) (inclusive of a 19% calibration factor). A refuge area on or above level one is recommended for occupants using and working on the ground floor. This refuge area will require adequate bathroom facilities and to be furnished with emergency supplies that will be maintained by responsible wardens and/or building managers. Detail design will need to ensure that there are restrooms and facilities to access emergency supplies and support in the event of a flood emergency.

Issue: Flooding – Flood Study

- a. *The flood maps provided in the report have significant differences in terms of the flood extents and flood levels. A comparison between Council's Flood Enquiry Information vs. the Flood report prepared by GRC Hydro, dated 16 June 2022. 1% AEP flood extent is attached. Refer to **Appendix 1**. The extent of flooding along Gregory Place, Alfred Street and Hassall Street are significantly less in the GRC Hydro Report compared to the adopted Council Flood Study which should be investigated.*

Action: *The consultant should compare flood extents and investigate the differences; the submitted models should be independently peer reviewed by a suitably qualified engineer/flood modeller. The results of the peer review should be documented and submitted to Council.*

Response

We note that this comment was made to the EIS submitted flood modelling, which has been substantially revised for this RTS.

- b. *There are numerous issues in the PRFS Clay Cliff Creek model, which make it unsuitable for use.*
- *Duplication of inflows at sub-catchment LP1.19b, which has applied the total flow from the hydrologic model although not being situated at the upstream boundary of the hydraulic model.*
 - *The creek segment between Hassall St and Alfred St was modelled in the 2D domain, which has resulted in the underestimation of the flow conveyance of the channel in the vicinity of the site. GRC's model instead incorporates detailed survey received in August 2024 in order to model the open channel in the 1D domain, which has significantly reduced the out-of-bank flows impacting the site.*

The pedestrian footbridge on Clay Cliff Creek immediately upstream of the site was modelled as having a closed cross section and creates a large energy loss to the hydraulic model. This was deemed inaccurate since the structure doesn't include piers and the soffit and deck are situated well above the open channel.

Further discussion of this issue can be found in GRC Hydro's updated Flood Assessment, including confirmation from Council which acknowledged the PRFS model has inherent errors, and that site specific models should be progressed in those areas.

According to the Flood Information provided to the applicant by Council on 23 September 2020, part of the site is classified as a High Flood Hazard area. Council's DCP states that high flood risk areas are not suitable for residential development.

Action: *The proposed building footprints should be amended (narrowed) to avoid flood impacts and to avoid the high flood risk area. Suspended slab structures over a high hazard area are not supported, given bulk and scale concerns. There is high risk associated with floodwater surrounding the buildings with regards to safe access and egress that needs to be assessed.*

Response

As demonstrated above, council's PRFS flood modelling has some errors which has made it unable to be relied upon at this site. Council have acknowledged that the PRFS modelling contains errors.

In GRC Hydro's modelled 1% AEP event (including climate change), the site is not subject to high hazard. Only Clay Cliff Creek to the south of the site experiences high hazard with H5 and H6 remaining wholly within the creek (see Figure 14 of the flood impact assessment).

In the highest theoretically possible event, the PMF, the site is subject to H5 hazard only in one small corridor at the western end of the site (see Figure 16). In a PMF event, occupants will be sheltering within the buildings separate from this hazard and elevated on levels 1 or above – above the PMF level.

Some building walls are subject to H4 in the worst case with most of the walls subject to either no flooding or low hazard flooding (H1 or H2).

There are culverts along Clay Cliff Creek at road crossings that are in very close proximity of the site which can be subject to extreme blockages during major floods. It appears that the modelling provided by the application applies a zero blockage along the culverts. A suitable blockage factor should be calculated for each crossing and utilised in the flood model. In highly urbanised catchments such as Clay Cliff Creek there are large floating debris which can often exceed 3m in length, such as cars, shopping trolleys, household materials etc. which should be factored in the blockage calculations as per the guidelines.

Action: A suitable blockage factor should be applied at culvert crossings as per the requirements of ARR2019 Book 6, Chapter 6 Blockage of Hydraulic Structures. The models should be updated, and the blockage scenario should be adopted for the design floods not as a sensitivity. This zero blockage condition may also impact on the design of creek bank i.e., higher velocities and increased scour potential and may result in hazardous condition e.g. increased flows, flood levels at downstream of the culverts.

Response

Blockage factors according to ARR 2019 guidance have been applied.

Stormwater pits and pipes were assumed as 100% blocked. The Alfred St crossing, as discussed in Table 1 above, adopts a 10% blockage factor.

For comparison, the PRFS 2024 study did not consider blockage.

- b. *There are two types of flooding that affects the site mainstream/riverine flooding from Clay Cliff Creek and the local catchment overland flooding from the catchment that is located to the north of Clay Cliff Creek including the site area itself. The report fails to address the overland flow paths across the site. The concept architectural drawings Site analysis Plan, Issue B, Drawing Number CD 003 show potential overland flow paths in the existing site plan. These overland flowpaths and others should be included in the flood study as blocking the overland flow paths will deflect the floodwaters to other areas and may cause significant flood hazard internal and external to site.*

Action: The overland flow/local catchment should be included in the TUFLOW models. A rain-on-grid approach may be suitable to include the local catchment to the north of Clay Cliff Creek. A combined model that incorporates riverine and local catchment flooding for both pre-development and post development scenario needs to be adopted.

Response

Overland flow has been incorporated into the modelling for this site.

Overland flow flooding has been incorporated into the TUFLOW model as per the following:

- South of Clay Cliff Creek applies inflows from a WBNM hydrologic model.

- North of Clay Cliff Creek uses the rainfall- on-grid modelling approach, with the primary objective of accurately assessing the potential impacts of the proposed development on Hambledon Cottage.
- Australian Rainfall and Runoff (ARR) 2019 hydrology and methodology appear to have been used in the flood study with no consideration given to alternative methods for verification or sensitivity testing.

Action: As advised in Draft Floodplain Risk Manual, DPE, 2022 sensitivity with ARR 1987 methodology needs to be included in the updated flood submission.

Response

GRC Hydro's updated modelling has used an ARR87 approach for the mainstream modelling and an ARR19 approach for the overland modelling. ARR19 is current best practice and has been used for the overland flow component accordingly. However, for the mainstream component, ARR87 has been used to generate conservative flows.

- c. *A fixed tailwater boundary appears to have been used, however there are no further details on the adopted downstream flood level. The potential for coincidence with downstream tailwater levels (Parramatta River) or tidal inundation levels is possible at the site location. The downstream boundary levels could have significant impact on the flood levels and flood behaviour at the site location. The boundary level selected should be discussed in the report. An increased tailwater level such as the 1% AEP level at Parramatta River should be investigated and the increased flood risk as a result should be addressed in the submitted reports.*

Action: The boundary level selected should be discussed in the report. An increased tailwater level such as the 1% AEP level at Parramatta River should be investigated and the increased flood risk should be addressed in the submitted reports. A detailed sensitivity analysis for impact of tailwater condition needs to be undertaken and included in the report.

Response

The adopted tailwater level was informed based on the initial water levels applied in council's model via the 2D_IWL polygon.

That is:

5% and 1% AEP: TWL = 3.0 mAHD (based on IWL = 2.83) – this value is higher than the PRFS downstream value as it is being applied further upstream.

PMF: TWL = 3.90 mAHD (based on IWL = 3.55). Sensitivity testing considered a tailwater envelope ranging from 3.0 to 4.3 mAHD (which is greater the PRFS TW of 4.17 mAHD) and flood levels at the site did not change as a result of testing this variation of tailwaters. As the downstream boundary conditions are placed a suitable distance from the subject site, and owing to the relatively elevated nature of the subject site versus the downstream boundary, the settings made in the two models are for all intents and purposes identical.

- d. *There are significant flood impacts that are caused as a result of the proposed development. There are impacts up to 100mm and there are newly flooded areas outside the site area. There is increased flood risk as a result of the proposed development, which is contrary to the DCP and Floodplain Development Manual 2005.*

Action: The proposed building footprints should be amended (narrowed) to avoid flood impacts. Setbacks from the creek should be implemented as legally required by the Water Management Act 2020.

It should be demonstrated that the following requirements are achieved and clearly reported in the flood report;

- i. *No worsening of the adjacent properties in terms of flood levels, flood hazard, velocity and duration of inundation, impact maps to be included.*
- ii. *No loss of existing flood storage, a comparison table needs to be included. There are no details on compensatory flood storage proposed, as mentioned in flood report. A separate drawing including levels, cross sections, hazard needs to be included. It is recommended that all flood storage to be above ground.*
- iii. *No increase in flow, flood levels and velocities in creek at downstream of the subject site. A comparison table needs to be included in the report.*

Response

Flood level impact maps have been included in the report. Modelling indicates that impacts are largely contained within the existing site with only a small section of Gregory Place's western gutter becoming wet where it was previously dry in a 1% AEP event inclusive of Climate Change. Some random pixels (in purple) show new wetting however the disconnected nature of these pixels indicates this is due to a minor model instability.

- e. *As per the submitted Flood Risk Management Report, dated 16 June 2022, identifying potential effects of climate change is presented as a requirement as per State Significant Development Guidelines (page 1, summary). The flood study and risk management report do not contain any information on climate change which is conflicting. Climate change impacts including increased rainfall and runoff and sea level rise should be assessed in the submitted flood models and reports.*

Action: Implement climate change factors as per ARR2019 guidelines Book 1 Chapter 6, the design should consider the service life of the proposed development and implement conservative RCP8.5 scenario. Climate change scenario should be adopted as per design case scenario.

Response

Climate change has been considered by accounting for 0.9 m increase to the fixed tailwater level and a factored rainfall increase of 19% above the 1% AEP design event.

- f. *The adopted floor levels of RL. 5.5 m AHD plus the 500 mm freeboard (Flood Risk Management Report, page 4) is not suitable for this type of development. Parramatta DCP 2011 requires the PMF level (9.3m AHD) to be adopted as the proposed buildings can be essential to evacuation during periods of flood or if affected during flood events would unreasonably affect the ability of the community to return to normal activities after flood events.*

Action: All habitable floor levels to be equal or greater than the Probable Maximum Flood (PMF). This increase in FFL may cause a greater design impact given Councils bulk and scale concerns.

Response

The proposed development is Residential and located on a site experiencing medium flood risk. The floor level control for proposed developments of this use and flood risk as per the Parramatta DCP 2011 Table 2.4.2.1.2 and Table 2.4.2.1.3 is: "Habitable floor levels to be equal to or greater than the 100 year ARI flood level plus freeboard."

- g. *The building footprints shown on the architectural drawing Site Plan, Drawing No: CD 005 is significantly different to the footprints shown in the submitted Flood Study by GRC Hydro (1% AEP Peak Hazard Conditions, Figure No 11). The boundaries of Building C appear to have been modified. The modelling of building footprints should be reflected in the flood study as per architectural drawings. Any differences in the building footprint will lead to misrepresentation of flood behaviour and likely to cause undesirable flood impacts.*

Action: Amend building footprints as per the latest architectural plans and update flood modelling as necessary.

Response

updated reporting and modelling has been based on the architectural drawings prepared by Tzannes and provided to GRC Hydro.

- h. Flood study reports 1% AEP to be 28.8 m³/s which is less than Lower Parramatta River Flood Study (LPRFS) which estimates 34 m³/s. Flood Levels are also less than Council's adopted flood levels. Furthermore, Stormwater Management Plan calculates the flow as 46 m³/s from DRAINS Model.*

Action: As estimated flows are varying significantly which may have significant impact on assessment, a detailed review needs to be undertaken and appropriate flows needs to be adopted for the flood assessment. It is likely to produce the higher flow results than LPRFS as lower percentage of imperviousness adopted for the study. Electronic copy of all updated models DRAINS, WBNM and TUFLOW along with electronic copy of sub catchment plans and relevant details need to be provided for review. Flood report does not include details such as impervious areas and other parameters adopted.

Response

There are numerous issues in the PRFS Clay Cliff Creek model, which make it unsuitable for use.

Duplication of inflows at sub-catchment LP1.19b, which has applied the total flow from the hydrologic model although not being situated at the upstream boundary of the hydraulic model.

The creek segment between Hassall St and Alfred St. was modelled in the 2D domain, which has resulted in the underestimation of the flow conveyance of the channel in the vicinity of the site. GRC's model instead incorporates detailed survey received in August 2024 in order to model the open channel in the 1D domain, which has significantly reduced the out-of-bank flows impacting the site. The pedestrian footbridge on Clay Cliff Creek immediately upstream of the site was modelled as having a closed cross section and creates a large energy loss to the hydraulic model. This was deemed inaccurate since the structure doesn't include piers and the soffit and deck are situated well above the open channel.

- i. Sensitivity testing of roughness parameters have not been undertaken. Roughness values that are adopted in the model should be supported by relevant guidelines and site observations.*

Action: Manning's roughness should be assessed by applying an increase of 20 percent and decrease by 20 percent. Results should be compared with design case and included in the updated flood maps.

Response

Roughness parameters have been selected in accordance with Chow, 1959.

- j. It is noted that creek bank along the subject site has been proposed to be engineered vertical wall as shown in the snapshot from landscape plans. Council does not support this type of bank treatment for natural creek.*

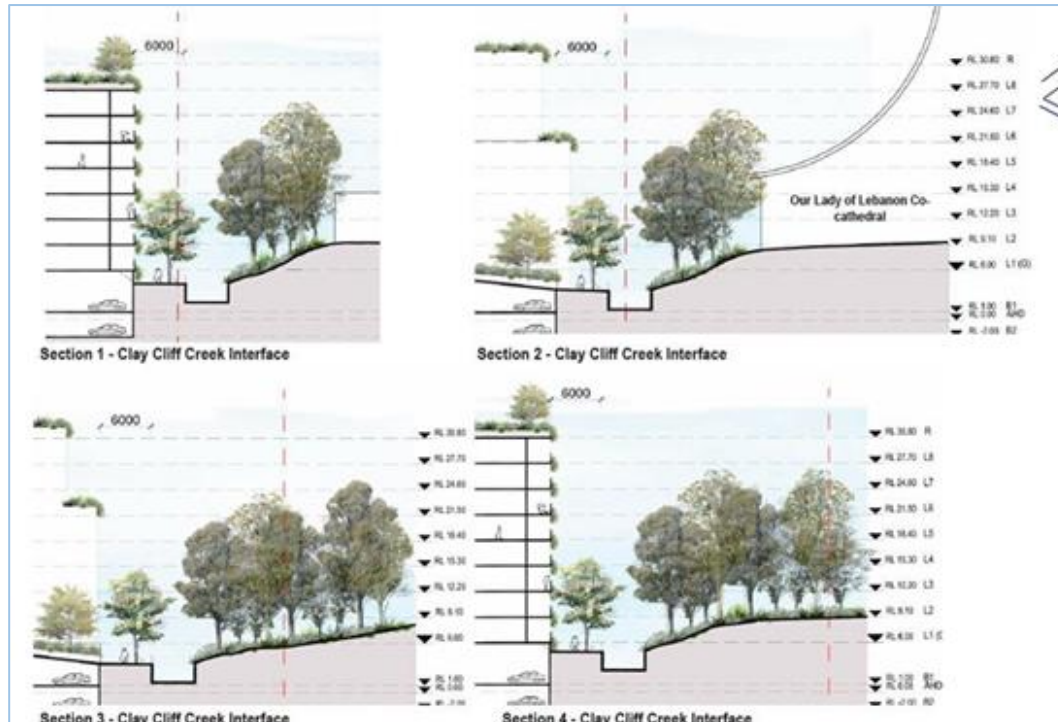


Figure 29 Clay Cliff channel set backs

Action: Riparian Area needs to be appropriately treated and planted to prevent any potential erosion in major flood events. Stormwater channel/creek belongs to Sydney Water and hence any works needs to be approved by Sydney Water.

Response

Clay Cliff Creek is not a natural creek, it is a stormwater channel controlled by Sydney Water and that any change to it cannot be made without Sydney Water providing support. The proposed design is in keeping with the existing engineered stormwater asset.

- k. Two driveways to the buildings are proposed to be in lower part of Gregory Place which is a high flood hazard area. It should be ensured that minimum level of the entry ramps is above 1% AEP (with climate change) + 500 mm free board.

Action: It is recommended to have entry to the higher side (further north of Gregory Place where flood depths are likely to be shallow) of the subject site. It is also strongly recommended that the basement carparking not be considered in this development due to the site being located within the floodplain unless the basement is fully protected and safe pedestrian evacuation access from the basement levels is provided for all flood events up to and including PMF.

Response

Only one driveway is now proposed. The basement car park will be fully protected for all events up to and including the PMF. Protection will be provided via passive measures above the 1% AEP event (solid walls and a driveway crest with 0.2 m freeboard). An active flood gate at the driveway will provide flood protection to the PMF level.

- l. The flood risk management report does not seem to contain any detail on structural soundness of the proposed buildings.

Action: A structural engineer's report is required to certify that the structure can withstand the forces of floodwater, debris, and buoyancy up to and including a PMF level.

Response

This comment is not relevant to a Concept stage application. When preparing Construction stage documentation, the structures will be designed consistent with all applicable guides and standards.

- m. *Flood Emergency Response Plan does not satisfy the requirements or consider the extreme hazardous flood conditions at site location.*

Action: *The report needs to be specific for the proposed development and consider the PMF flood event. The plan should also consider the number of occupants and visitors (persons at risk) during a flood event. A detailed Flood Emergency Response Plan needs to be provided to Council's Development Services Unit for assessment and approval.*

Response

The FERP does consider the PMF event and recommends all occupants seek refuge in the ample internal space above the PMF level. Emergency supplies, facilities and back-up power will be made available for the occupants for a duration that exceeds the development's potential 6 hour isolation period in a PMF event. The number of people present at the site during an Emergency is to be confirmed at the detailed design phase.

Issue: Flooding – Stormwater Management

- n. *Stormwater Management Plan, Kozarovski and Partners states that inclusion of On-Site Detention (OSD) will have a negative impact and hence not proposed for the development. To support this, the report mentions that a DRAINS model has been developed. This DRAINS model has not been supplied for review. Since the flows are different from the flood report and a comparison has been made with flows only. A detailed assessment and a comparison hydrograph are needed for review along with an electronic copy of the DRAINS model, sub-catchment plans, impervious areas etc. The following information needs to be provided to Council for assessment prior to any SSD approval. An electronic copy of DRAINS model along with sub-catchment plans need to be provided for review considering;*
- i. *Stormwater drainage system should be adequate for 5% AEP flow with 50% blockage in sag pits and 20% blockage in on-grade pits with safe overland flow in 1% AEP. Climate change should be included in the design case.*
 - ii. *Existing and Proposed utilities needs to be shown in long section and Plan.*
 - iii. *This information needs to be provided to council's development services for assessment and approval.*

Response

A link to the DRAINS models for the cases with and without the OSD are attached to the updated Integrated Water Management Plan at appendix M together with the Catchment Map.

- i. The DRAINS model considers the comments council has raised.
- ii. Existing and proposed utilities will be shown with the detailed SSDA submission.
- iii. Noted. It is also noted that Sydney Water has provided approval for discharge to the Clay Cliff Creek Stormwater Channel.

Issue: Stormwater pit details

- o. *Stormwater Pit Details should be included. Council's standard design should be utilised.*

Response

This comment is not relevant to a Concept stage application. When preparing Construction stage documentation, the Stormwater system will be designed consistent with all applicable guides and standards.

Issue: Manhole clear opening

- p. *Manhole clear opening (excluding step iron) should not be less than 900 mm.*

Response

This comment is not relevant to a Concept stage application. When preparing Construction stage documentation, the Stormwater system will be designed consistent with all applicable guides and standards.

Issue: Certification for Custom pits

- q. *Structural details and certification for Custom pits greater than 1.2m and Standard Pits greater than 2.5m depth needs to be included.*

Response

This comment is not relevant to a Concept stage application. When preparing Construction stage documentation, the Stormwater system will be designed consistent with all applicable guides and standards.

Issue: Pit cover/ grate

- r. *All pit cover/ grate should be class D heavy duty, galvanised steel, bike safe and bolted down type. If pit is in pedestrian area, then it should be heel-safe and anti-slip in addition.*

Response

This comment is not relevant to a Concept stage application. When preparing Construction stage documentation, the Stormwater system will be designed consistent with all applicable guides and standards.

Issue: pipes

- s. *All pipes should be class 3 or higher Reinforced Concrete Spigot and Socket Rubber Ring joint to comply with design cover and heavy vehicular loading whichever is higher.*

Response

This comment is not relevant to a Concept stage application. When preparing Construction stage documentation, the Stormwater system will be designed consistent with all applicable guides and standards.

Issue: Structural certification of pipes

- t. *Further, Structural certification of pipes is required having a depth greater than 2.5m.*

Response

This comment is not relevant to a Concept stage application. When preparing Construction stage documentation, the Stormwater system will be designed consistent with all applicable guides and standards.

Issue: Pipes should be class 3 or higher

- u. *All pipes should be class 3 or higher Reinforced Concrete Spigot and Socket Rubber Ring joint to comply with design cover and heavy vehicular loading whichever is higher.*

Response

This comment is not relevant to a Concept stage application. When preparing Construction stage documentation, the Stormwater system will be designed consistent with all applicable guides and standards.

Issue: Design for stormwater discharge

- v. *Appropriate design for stormwater discharge should be incorporated based on council's stormwater disposal policy. Detailed design/drawings need to be included for any discharge or connection out of*

the subject site. If it is proposed to connect to the channel then Sydney Water needs to approve the connection and discharge location.

Response

This comment is not relevant to a Concept stage application. When preparing Construction stage documentation, the Stormwater system will be designed consistent with all applicable guides and standards. The indicative design is based on council's stormwater disposal policy.

Additionally, Sydney Water provided their approval for the conceptual connection and discharge to the channel.

Issue: Stormwater Management Plan

- w. *The provided Stormwater Management Plan states that "The aim of the WSUD strategy is to intercept the runoff from the site and re-use it for irrigation and toilet flushing." WSUD approach should also consider improving stormwater quality and health of water receiving body.*
 - i. *While it is noted that Stormfilter 460 x8 have been proposed to treat private water, it is recommended to incorporate natural treatment trains e.g. Bio-garden, natural strips, to treat stormwater from internal roads to improve water quality of stormwater reaching the creek.*
 - ii. *Separate plans for Overall Water Sensitive Urban Design (WSUD) map should be included in the design drawing submission*
 - iii. *An electronic copy of MUSIC Model should be provided for review.*
 - iv. *Rainfall Station should be PARRAMATTA NORTH MASONS DR (66124) 6 minutes data from 1988 to 1998 (10 years). It is also available in MUSIC-Link for MUSIC_X.*

Response

Natural treatment

The WSUD scheme now includes two rain gardens located at the Eastern and the Western corners of the site. The stormwater runoff from the catchments to the North of the site is also treated through the raingardens. Stormwater will be used for landscape irrigation purposes and potentially toilet flushing.

Water Sensitive Urban Design (WSUD) map

A WSUD map has been included in the latest submission.

MUSIC Model

A MUSIC model is attached to this report.

Rainfall Station

The MUSIC model has been prepared using the PARRAMATTA NORTH MASONS DR (66124) 6 minutes data from 1988 to 1998 (10 years) is attached to the revised stormwater report.

Issue: Flooding – Clay Cliff Creek

- a. *Constraints for urban development adjacent to rivers and creeks include physical constraints as well as requirements for additional assessment and approvals under the Water Management Act 2000. The proposed works are within the riparian zone according to the Guidelines for Riparian Corridors (RC) on Waterfront Land, Natural Resources Access Regulator (NRAR), May 2018. Clay Cliff Creek fits into the definition of a riparian zone, defined as a 1st order stream according to the NSW Government- Determining A stream order fact sheet. According to NSW Geographical Names Board Clay Cliff Creek is officially recognised as a gully (refer to Appendix 2).*

- b. *The WaterNSW website defines the riparian zone as; “land alongside creeks, streams, gullies, rivers and wetlands. These areas are unique and diverse, and are often the most fertile parts of the landscape.”*
- c. *Controlled activities carried out in, on or under waterfront land are regulated by the Water Management Act 2000 (WM Act) as referenced in the guideline.*
- d. *According to RC Guidelines a buffer of 10 metres is required on each side of the watercourse which is called the VRZ (vegetated riparian zone-refer to Appendix 3). The current proposal does not have any buffer.*
- e. *According to the WM Act the definition of “waterfront land” and “river” is as below.*
 - *Waterfront land means; the bed of any river, together with any land lying between the bed of the river and a line drawn parallel to, and the prescribed distance inland of, the highest bank of the river, or*
 - *(a1) the bed of any lake, together with any land lying between the bed of the lake and a line drawn parallel to, and the prescribed distance inland of, the shore of the lake, or*
 - *(a2) the bed of any estuary, together with any land lying between the bed of the estuary and a line drawn parallel to, and the prescribed distance inland of, the mean high water mark of the estuary, or*
 - *(b) if the regulations so provide, the bed of the coastal waters of the State, and any land lying between the shoreline of the coastal waters and a line drawn parallel to, and the prescribed distance inland of, the mean high water mark of the coastal waters,*
 - *where the prescribed distance is 40 metres or (if the regulations prescribe a lesser distance, either generally or in relation to a particular location or class of locations) that lesser distance. Land that falls into 2 or more of the categories referred to in paragraphs (a), (a1) and (a2) may be waterfront land by virtue of any of the paragraphs relevant to that land.*
 - *river includes—*
 - *(a) any watercourse, whether perennial or intermittent and whether comprising a natural channel or a natural channel artificially improved, and*
 - *(b) any tributary, branch or other watercourse into or from which a watercourse referred to in paragraph (a) flows, and*
 - *(c) anything declared by the regulations to be a river,*
 - *whether or not it also forms part of a lake or estuary, but does not include anything declared by the regulations not to be a river.*

Recommendation: Council recommends a Riparian Corridor Study to be undertaken that investigates the requirements and required setbacks from creek. This study should investigate the current Clay Cliff Creek and also the original creek alignment. A suitably qualified professional should be engaged to undertake a detailed study to identify and assess the requirements and seek necessary approvals to satisfy relevant guidelines and legislation. Further requirements need to be confirmed from council’s Open Space and Natural Area department.

Response

The development is exempt from requiring approval for works within waterfront land, as Clay Cliff Creek is a ‘fully concrete lined’ watercourse, under Part 2 Schedule 4 Clause 28 of the Water Management (General) Regulation 2018.

Clay Cliff Creek, a ‘fully concrete lined’ watercourse, traverses through the southwest section and along the southern boundary of the concept SSD property. The concept SSD would include development

approximately 5m distance from the Clay Cliff Creek high-bank level. Therefore, a proportion of the proposed SSD will occur within 40m of the high-bank and as such is considered ‘waterfront land’ under the WMA 2000.

The Water Management (General) Regulation 2018 specifies a number of exemptions. Clause 42 states: *“A person (other than a public authority) is exempt from section 91E(1) of the Act in relation to controlled activities specified in Part 2 of Schedule 4 that are carried out in, on or under waterfront land.”*

the Act refers to:

“the Water Management Act 2000.”

Clause 91E (1) of the Water Management Act 2000 No 92 states:

“91E Carrying out controlled activity without, or otherwise than as authorised by, a controlled activity approval

A person—

who carries out a controlled activity in, on or under waterfront land, and

who does not hold a controlled activity approval for that activity, is guilty of an offence.”

Part 2 Schedule 4 of the Water Management (General) Regulation 2018 defines the controlled activities exemptions. Clause 28 relates specifically to Activities on waterfront land if river is concrete lined or in pipe, which states the following exemption:

“Any activity carried out on waterfront land relating to a river where the channel of the river is fully concrete lined or is a fully enclosed pipe channel.”

This clause provides an exemption to the “Controlled Activities” in the Water Management Act 2000, including the requirement for a Riparian Zone Management Assessment.

Issue: Heritage

The proposal is located on the boundary of Experiment Farm Heritage Conservation Area (HCA) as identified within the Parramatta DCP 2011 and although these controls are not applicable to the subject site, the indirect effect of this proposal would adversely impact the following objectives of the HCA:

- 1 *Protect all the attributes which contribute to the heritage value and character of the Experiment Farm Conservation Area, and to maintain and improve its residential amenity.*
- 2 *Ensure that Experiment Farm will always have an appropriate setting so that it can continue to tell the history of Colonial Australia to citizens and international visitors.*
- 4 *Maintain the low scale suburban character of the area*

Despite the support from Heritage NSW for the application to proceed to DA stage, Council’s Heritage Advisor continues to have concerns that the bulk and scale of the development is excessive given the site constraints and the proximity to heritage items and the Harris Park HCA.

It is also unclear if the proposed basement will conflict with the archaeological potential of the site. There are items of environmental importance such the existing landscape, the reserve and Clay Cliff Creek which could affect the feasibility of the current proposal. This is to be explored further before approval is granted for any basement.

The reports and the provided response on heritage, visual and archaeological impacts are questionable in terms of compliance of building form and height, suitable degree of visual and physical separation with the heritage items and the possible riparian zone (vegetated riparian zone). It is premature to exclude archaeological potential both aboriginal and non- Aboriginal as natural watercourse are associated with aboriginal uses of natural resources and the colony, and first settlers created their homesteads in proximity of those watercourses. Council has three surviving examples in this area and there is a potential to investigate more in the subject site.

Once the archaeology of the site is better understood, a suitable strategy for heritage interpretation of the existing resources, natural, archaeological, and built, should be developed that would inform the final design. The park is surrounded by natural reserves, the site should consider Council’s concerns regarding flooding and open space and create additional open space and natural reserve

where significant constraints exist. This would allow a further degree of separation or transition with heritage, natural and low density-built environment as required.

In summary, Council's Heritage recommendations are as follows:

- *lower scale and bulk of the buildings – significant reduction in height is required*
- *an increased setback to Gregory Place to reflect the similar setback of the residential area*
- *increased buffer zone with Clay Cliff Creek as per flooding requirements*
- *an updated Heritage Interpretation Strategy to include the former water course of Clay Cliff Creek*
- *a better and larger contextual analysis of the original natural water course alignment and the existing artificial water course to address the naturalisation of its two paths. Provide comparative examples of vegetated riparian zones.*

Response

Refer to the updated Statement of Heritage impact Sub-sections 7.1 and 7.4. The amended proposal has been thoughtfully designed in terms of built form, scale, height, and setback to ensure the proposed new buildings

will not detract from its historical context. The proposed development includes the integration of landscape elements that reflect the heritage context, contributing to and enhancing the rich history of the Harris Park precinct.

The buildings have been reconsidered and areas around Hambledon cottage reduced in height. The setback from the Gregory Street boundary is 6 metres. This is reasonably consistent with the neighbouring properties. The buffer zone adjacent to Clay Cliff Creek stormwater channel is consistent with flooding requirements. The Clay Cliff Creek stormwater channel is a Sydney Water asset. Amendments to the channel cannot be undertaken without the support of Sydney Water.

Regarding the original water course alignment, the river valley landscape around the site has shifted and changed over thousands of years in relation to wider global climate changes. Around the time of European colonisation of the site, what is now the channelised Clay Cliff Creek stormwater channel was a chain of ephemeral freshwater ponds. As described in the 2025 Aboriginal Cultural Heritage Assessment Report prepared by Dominic Steele Consulting Archaeology:

Before the colonisation, watercourses were discontinuous chains of ponds and wetlands that relied on heavy rain to overflow the ponds and join them into a stream. The ponds drought-proofed the land by keeping water available for plants, animals and people. Settler activity disrupted this by draining the wetlands, clearing vegetation, grazing sheep and cattle and introducing rabbits. These activities caused rain to bite into watercourses, converting the chains of ponds into continuous streams in incised channels up to 15 metres deep, with water draining quickly away.

It is likely the landscape between Clay Cliff Creek and the Parramatta River had uneven and low-lying surface topography that features chain of ponds drainage and swampy meadows formation vegetation and ecologies.

The access to fresh water that would have made it a suitable location for the establishment of the early colonial agricultural projects in the area would also have made it a valuable place for Burramattagul people pre colonisation. The historic chain of ponds was replaced by a new stormwater channel, removing traces of the pre-colonial life on Country. For this reason, the Statement of Heritage Impact, and other reports, refer to this watercourse as a 'stormwater Channel'.

Issue: Building Height and Scale

The proposed 6-8 storey building height dwarfs Hambledon Cottage and the existing surrounding context in Gregory Place and the 67% variation to the Parramatta LEP Height Control of 9.2m should not be supported by the consent authority. A maximum height of 11m is more commensurate to the existing character of the area and should be the maximum height sought. The proposal does not adequately respond to this important heritage and low scale residential context, the unique site characteristics, streetscape and existing and future character of the locality. It is therefore considered a massive overdevelopment.

- *A maximum height of 3 storeys across the site (up to 11m) should be enforced, as:*
 - *This height is a balance between the existing surrounding context and future development potential to the South and East.*
 - *It will reduce the impact of the proposal as a backdrop to Hambledon Cottage when viewed from the North.*
 - *It will allow for better protection of view corridors from Elizabeth Farm to Hambledon Cottage and Experiment Farm to Hambledon Cottage per the requirements of 4.3.2 of Parramatta DCP 2011.*
- *A maximum 1-2 storey street wall height with recessed 3rd storey aligned with Gregory Place and Hambledon Cottage should be enforced, to:*
 - *Acknowledge the lower scale existing single residential context and height limit along the opposite side of Gregory Place (ranges from 6-8m).*
 - *Allow the opportunity for a more appropriate architectural character interface to Hambledon Cottage and Gregory Place. The built form expression should replicate aspects typical of multi-dwelling housing design with vertical architectural expression, broken into smaller bays which reference the built form pattern of the existing streetscape, rather than the sprawling horizontal expression typical of residential flat buildings, which are currently prohibited in this context.*
- *3 storey streetwall/maximum height to Clay Cliff Creek and Experiment Farm Reserve and surrounding parklands should be enforced, to:*
 - *Respond to the natural topography of the site, as it approximately aligns with the height at the top of the embankment on the southern side of Clay Cliff Reserve.*
 - *Allow for increased solar access to the Channel Walk, imperative to allow for adequate landscaping, pedestrian safety and amenity requirements.*
 - *Minimises the canyon effect along the channel walk and creates an open, natural environment along the creek that links to surrounding parklands/reserves.*
- *No building length should exceed 50m.*

Response

The applicant acknowledges the sensitivity of the site and the importance of appropriately managing building height, bulk and scale in the context of adjacent heritage items, landscape elements, and existing low-rise residential character. However, it is important to note that the alternative height envelope proposed in the submission—specifically the 3-storey (11m) height limit and 1–2 storey street wall—was not supported by any accompanying urban design study, view analysis, shadow modelling, heritage assessment, or landscape testing. It represents a hypothetical alternative rather than a substantiated urban design proposal.

In contrast, the exhibited scheme and the revised design presented in this Response to Submissions Report are the result of detailed design testing and consultation with the Government Architect NSW, the State Design Review Panel, council, and expert heritage advisors. The proposal has undergone a substantial post-exhibition refinement process that reflects genuine responsiveness to the concerns raised.

As detailed in Section 1.4 of the Tzannes design report (Key Design Updates), the following key design changes have been made:

- **Building heights have been reduced and redistributed** across the site, resulting in a built form that is better modulated and more respectful of the surrounding context. Taller elements are now located centrally within the site and away from Gregory Place, Hambledon Cottage and the Clay Cliff Creek corridor (see Section 5.4 Built Form Strategies).
- **The building footprint has been reduced by over 1,000m²** (approximately 14%), enabling greater open space provision, deeper setbacks and the creation of a **30-metre-wide green corridor** aligned with the historical Clay Cliff Creek alignment.
- **Building height adjacent to the childcare centre has been lowered** to preserve solar access in accordance with relevant design criteria (refer to Section 7.4.2 Shadow Diagrams).
- **The interface with Gregory Place has been improved** through increased landscape setbacks, articulation of the built form into vertical bays, use of terrace-style references, and avoidance of uniform street wall expression.

These changes directly respond to key concerns raised, but they do so through a transparent, tested and evidence-based design methodology. They are supported by:

- The **updated Statement of Heritage Impact** (GBA Heritage), which confirms that the revised proposal protects the heritage values of Hambledon Cottage and the broader setting by increasing setbacks, preserving view corridors, avoiding abrupt height transitions, and integrating landscape buffers and interpretative design elements.
- The **Visual Impact Assessment**, which demonstrates that the revised massing strategy successfully reduces perceived scale from key public viewpoints, including from the Experiment Farm reserve, the northern approach to Hambledon Cottage, and along the channel walk.
- The **Clause 4.6 variation request** (Appendix C), which provides a detailed justification for the proposed height under the Parramatta LEP 2011, confirming that strict compliance with the 9.2m control is both unreasonable and unnecessary in this context and that the height outcome delivers a superior urban and environmental result.

It is also important to recognise that the SCC issued in 2017 under the (now repealed) ARH SEPP—and preserved by operation of the Housing SEPP 2021—confirms the strategic planning intent for this site to transition from its legacy industrial use to a mid-rise residential flat building precinct. A 3-storey limit would effectively preclude the site's capacity to deliver any affordable housing at the scale necessary to meet strategic housing needs, contrary to the purpose and intent of division 5 of the Housing SEPP.

With regard to the heritage view corridors and DCP references cited in submissions:

- The suggestion that views from Elizabeth Farm to Hambledon Cottage and from Experiment Farm to Hambledon Cottage will be obstructed has not been substantiated by modelling or analysis.
- In contrast, the revised scheme retains view lines and open spatial relationships between these items through central corridor planning and increased visual permeability. These matters are discussed in detail in the Tzannes design report and supported by photomontages and view line diagrams in the accompanying appendices.

Conclusion

The alternative height scenario suggested in submissions has not been informed by any technical testing, solar or visual analysis, or heritage assessment. While the concerns are acknowledged, they are not supported by a structured design process or an understanding of the strategic planning framework and site-specific constraints. In contrast, the revised scheme presented in this report reflects a careful and evidence-led approach that balances housing delivery, heritage protection, and design quality.

The proposed building height strategy is compatible with the surrounding context, justified on environmental planning grounds under clause 4.6 of the Parramatta LEP 2011, and consistent with the objectives of the Housing SEPP and the EP&A Act. The height variation should be supported to enable a high-quality, inclusive residential outcome that respects the significance of Hambledon Cottage while meeting urgent housing needs in Greater Parramatta.

Issue: Site Planning

The proposed site planning results in the impression of a private gated estate, with a majority of the site isolated from the public domain and without a street address. The location and scale of buildings unacceptably impacts on protected heritage views. The proposed Channel Walk is considered a key strategic move connecting heritage items within the locality and is supported; however, it should be more generous.

- *Exploration of a more open road within the site along the Northern boundary, to replace the proposed private accessway, which will:*
 - *Improve public connectivity and wayfinding through the site and allow each building to have a clear street address;*
 - *Provide a public interface to the rear of Hambledon Cottage, the parklands, Clay Cliff Creek and Experiment Farm Reserve;*
 - *Provide better access to the site for emergency services;*
 - *Allow for on-street carparking; and*
 - *Improve pedestrian safety and wayfinding by providing a dedicated pathway and verge along the street.*
- *It is recommended that Building C be removed from the proposal. Building C is proposed to be the bulkiest building within the site, with no setback or transition in height to its context, is located in the isolated North Western corner of the site removed from the public street frontage and directly adjacent to the parkland setting of Experiment Farm and Hambledon Cottage. Removal of Building C will:*
 - *Maintain an absence of built form in this location to protect important view corridors between Experiment Farm and Experiment Farm Reserve and Hambledon Cottage and respond to flooding constraints;*
 - *Create a strong spatial and visual connection between the proposal and Experiment Park Reserve and the parklands;*
 - *Allow for the space at the western edge of the site to be used for communal open space and deep soil provision and to strengthen the parklands setting between Experiment Farm and Hambledon Cottage;*
 - *Help retain large significant trees to the north-western edge.*
 - *Allow for the view corridor created by the recommended public road to terminate in landscaping rather than built form.*
 - *Should Building C not be removed from the development:*
 - *The local road should return south to give a public frontage to the building.*
 - *Additional setbacks (at least 10m) should be provided to existing mature trees to the northwest corner of the site.*
- *Building footprints and building separation should be designed to frame important view corridors around and through the site, including those associated with Experiment Farm and Reserve, Hambledon Cottage, Elizabeth Farm and the Channel Walk.*
- *Primary entry lobbies should not be located along the Channel Walk due to wayfinding and safety concerns. Access to buildings should be provided only from a public street interface, with the potential for secondary access points to the Channel Walk.*

Response

The proposed site planning has been substantially refined to address concerns about permeability, legibility, and integration with the heritage and open space landscape. These changes have been informed by a design-led process underpinned by expert input from urban design, landscape, heritage, flooding and access specialists, as well as feedback from the State Design Review Panel and council.

Importantly, the recommendations made in submissions—including the creation of a new public road, and removal of Building C—are not supported by technical design testing, flooding analysis, or heritage or urban design assessment. While well-intentioned, these suggestions do not appear to account for topographical constraints, groundwater limitations, the existing riparian corridor, nor the SCC-confirmed planning strategy for transitioning this industrial site to mid-rise residential use under division 5 of the Housing SEPP. The design team has tested and responded to these matters comprehensively.

Northern boundary accessway

The northern site interface has been reconfigured to improve permeability and legibility, while respecting heritage view corridors and environmental constraints. Although this interface remains a private internal road due to site ownership and servicing requirements, it has been widened and re-landscaped to provide a generous and green public domain experience for pedestrians and cyclists, and clear sightlines to Hambledon Cottage.

Key changes include:

- **Building C has been significantly redesigned:** It now occupies a **smaller footprint**, is **reduced in height** (from 7 to 4–6 storeys), and is **set well back from the north-west corner**, avoiding any built form intrusion into the critical visual corridor between Experiment Farm and Hambledon Cottage.
- A **59-metre setback from Parkes Street** is now provided to protect existing mature trees and accommodate generous landscaping and pedestrian movement.
- The accessway has been redesigned to support **emergency vehicle access, pedestrian movement, and landscaping**, with passive surveillance and clear wayfinding lines to the central Channel Walk and public spaces.

The revised configuration supports the strategic function of the **Channel Walk as the central spine** of the precinct—connecting heritage items, reinforcing landscape continuity, and maintaining open view lines. Given flooding and topographical constraints along the northern edge, and the site's location below the adjacent Experiment Farm escarpment, a full public road in this location would not achieve the stated objectives and would risk undermining the ecological and cultural landscape interface.

Building C

Removal of Building C, as proposed in submissions, is not supported. The building is a fundamental part of the site strategy, confirmed under the 2017 SCC, and is necessary to achieve the affordable housing yield required to justify the redevelopment of this site.

However, **its scale and position have been substantially amended** in the revised design:

- The building has been pulled away from the north-western boundary and the parkland edge.
- Its height has been **reduced** to 4–6 storeys, with upper levels recessed.

- It now contributes to the **spatial framing of the Channel Walk** without dominating its outlook or compromising heritage values.
- The space surrounding Building C now includes **deep soil planting, communal open space**, and a **strong landscaped interface with the western edge**, strengthening the connection between Hambledon Cottage and the Experiment Farm landscape.

These changes achieve the core objectives raised in submissions—protection of views, enhancement of setting, and public domain quality—without compromising the functional or social sustainability of the development.

View corridors and visual integration

The revised plan maintains and frames view corridors around and through the site, particularly those between Hambledon Cottage, the central green spine (Channel Walk), and the OLOL Co-Cathedral. As confirmed in the Visual Impact Assessment and Statement of Heritage Impact:

- **No direct views from Experiment Farm or Elizabeth Farm to the subject site exist**, due to topography, tree cover and development patterns.
- However, the revised scheme enhances open views **within the site** and **between Hambledon Cottage and adjacent landscape areas**, reinforcing the spatial reading of the site’s heritage setting.

Primary entries and access

Primary entry lobbies are **not located on the Channel Walk**. As requested in submissions, all primary entrances are accessed from the internal road and footpath system, ensuring clear public address, security and legibility.

Secondary entries from the Channel Walk may be provided for convenience but are clearly subordinate and designed for passive surveillance and compatibility with the public domain.

Conclusion

The revised site planning achieves a sensitive and coherent response to heritage, access, flooding, and environmental considerations. The suggestions made in submissions—while noted—were not supported by detailed assessment or testing and do not reflect a feasible or superior alternative when weighed against the site’s constraints, strategic purpose, and planning framework.

Through tested setbacks, redistributed built form, integrated green infrastructure and a well-resolved pedestrian network, the proposal presents an open, legible and inclusive neighbourhood pattern—not a gated estate. The proposal protects and frames key views, strengthens the spatial relationship between significant heritage items, and achieves a balanced and supportable urban form consistent with the objectives of the EP&A Act and the Housing SEPP.

Issue: Setbacks

Setbacks to key interfaces along the site’s boundaries are insufficient, resulting in an insensitive relationship with Hambledon Cottage and the reserve, incompatible streetscape along Gregory Place and an interface with Clay Cliff Creek which doesn’t respond to the amenity and safety requirements of the proposed “Channel Walk”.

- *Provide a 10m ground setback from the top of Clay Cliff Creek embankment to:*
 - *Allow for a riparian landscape edge to the creek;*
 - *Provide a shared pathway (min. 3m width);*

- Allow for a landscaped buffer to the building which can facilitate larger tree planting and landscaping for privacy and a natural outlook for residents;
- Allow for landscaping strategies such as terracing and grading to mitigate level differences between natural ground level and internal building levels required for flooding. This will prevent the unacceptable use of large retaining walls;
- Provide WSUD opportunities which could support the naturalisation of the creek in the future;
- Increase building separation between the proposal and the steep embankment and Our Lady of Lebanon Church on the Southern side of the creek, which will increase views to sky and access to sunlight.
- Provide a 22.5m ground setback to the north boundary to:
 - Respect the historical Hambledon Cottage and its associated curtilage;
 - Retain existing trees along the Northern boundary, which provide a key backdrop to Hambledon Cottage;
 - Allow for a local road with a dedicated pedestrian path and on-street parking which can be dedicated to Council;
 - Allow for a planted front building setback from the road reserve and contiguous deep soil zones;
- Provide a 6m ground setback to Gregory Place to:
 - Align with the prevailing setback along the street and better integrate with the surrounding low-scale residential dwellings;
 - Allow for deep soil zones and tree planting;

Response

The proposed development incorporates a nuanced and context-sensitive approach to setbacks that balances the objectives of heritage protection, environmental performance, public domain quality, and built form integration. While the submission outlines a series of fixed setback dimensions, these appear to have been advanced in the absence of detailed testing, analysis or consideration of site constraints such as flooding, topography, vegetation retention, and urban design integration. By contrast, the proposed design reflects a tested and performance-based approach to setbacks that optimises heritage interface, ecological outcomes, solar access, pedestrian amenity and urban legibility.

1. Setback to Clay Cliff Creek stormwater channel (southern interface)

The proposal does not apply a uniform 10 metre setback along the top of the Clay Cliff Creek embankment. Instead, it adopts **a varied and responsive series of setbacks** ranging from **6 to 45 metres**, consistent with best practice landscape urbanism and placemaking principles.

This varied approach is intentionally designed to:

- **Create spatial rhythm and visual permeability**, avoiding a monotonous or over-engineered creek edge.
- **Frame the Channel Walk as a rich and varied experience**, with moments of enclosure and openness designed to encourage movement and storytelling (see Section 5.2 of the Tzannes design report, *Public Domain Strategies*).
- **Support riparian planting and WSUD outcomes**, including terracing and ground plane articulation to accommodate flood levels and promote tree planting and natural surveillance.
- **Enhance environmental education and place-based design** through interpretive elements and curated viewing platforms that reveal the ecological and cultural significance of the creek (see Section 7.6, *Photomontages*).

The Channel Walk is a deliberate and strategic urban gesture that improves north–south connections, frames views to Hambledon Cottage and the OLOL Co-Cathedral, and fosters integration with the

parkland and heritage landscape. The flexible setback strategy enables this outcome while responding pragmatically to flooding, safety, privacy and ecological factors.

2. Setback to northern boundary and Hambledon Cottage

The revised scheme provides a **minimum 12 metre setback** to the northern boundary, comprising a **tree-lined pedestrian-friendly accessway**, publicly accessible green space, and generous landscaped setbacks. While this is less than the 22.5 metres suggested in the submission, the proposal:

- **Respects the visual curtilage and setting of Hambledon Cottage**, as confirmed in the updated Statement of Heritage Impact (GBA Heritage).
- Retains and enhances the **canopy of mature trees along the northern boundary**, supporting landscape continuity and cultural memory.
- Incorporates a **cul-de-sac and turning head** that supports access and public address without formal road dedication, and includes verge planting, path separation and passive surveillance.
- Provides **generous building modulation**, with built form limited to **two and four storeys immediately north** of Hambledon Cottage, and **taller elements set back over 27 metres** from the northern boundary (see Tzannes design report, Section 5.4).

The proposed response delivers the underlying intent of the submission—heritage sensitivity, tree retention, public access, and interface management—without over-engineering or applying arbitrary metrics unsupported by evidence.

3. Setback to Gregory Place (western interface)

The proposal provides a **minimum 6 metre building line setback** to Gregory Place, aligning with the prevailing setback pattern and providing sufficient room for deep soil planting, visual transition and an appropriately scaled interface to the low-rise dwellings opposite.

Additional features include:

- **Vertical modulation and architectural rhythm** in building façades to break down apparent scale and reference finer-grain typologies.
- **Landscaped verge treatment and passive surveillance** to enhance the public domain and support pedestrian safety.
- Integration with **heritage interpretation and character-sensitive materials**, reinforcing streetscape coherence and minimising perceived mass.

Conclusion

The proposed setback strategy responds appropriately to the site's environmental, heritage and streetscape context. While submissions proposed fixed numerical setbacks, these were not supported by technical or design-based justification. The proposed approach is more sophisticated, grounded in evidence, and aligned with the objectives of the Housing SEPP, *Parramatta LEP 2011*, and the EP&A Act.

The development respects the heritage significance of Hambledon Cottage, facilitates a high-quality public domain along Clay Cliff Creek, and delivers compatible street relationships to Gregory Place through tested setbacks, landscaping and architectural modulation. As such, the proposed setbacks are considered suitable, supportable and consistent with good planning practice.

Issue: General

- *The basement should be consolidated beneath the building footprint and be setback from the northern and southern boundaries. The basement must not cover the whole site as it restricts opportunities to retain existing trees and provide for deep rooted planting.*
- *The façade along Gregory Place should be articulated and modulated to reflect the existing subdivision and dwelling patterns on the street.*
- *Opportunities to provide an active residential interface and passive overlooking onto public spaces (i.e., Experiment Farm Reserve, Clay Cliff Creek channel walk) should be investigated.*
- *Provide a clear delineation of public, communal and private spaces and pathways on all architectural drawings. This should include any areas fenced off from the public.*

Response

These concerns are acknowledged and have been directly addressed through amendments to the proposal and clarification of the role of the current SSD concept application. It is important to note that this application seeks **concept approval only**. It defines maximum building envelopes, indicative layouts, access and open space structure, and establishes urban design principles. Matters such as façade detail, fencing, levels and materiality will be addressed through **future detailed development applications** in accordance with the design guidelines and controls established at concept stage.

1. Basement extent and deep soil planting

In response to submissions and agency advice, the basement extent has been **significantly reduced**. It is now generally **confined beneath the building footprints**, rather than extending across the full site area as in the original scheme. This refinement allows for:

- **Substantial deep soil zones along the northern, southern and western perimeters**, supporting the retention of existing canopy trees and enabling new deep-rooted planting.
- Creation of **generous publicly accessible and communal open spaces** above the basement slab that will support tree planting, amenity landscaping and pedestrian use. These areas are designed with **1.5 metres of structural soil depth**, enabling soil continuity with adjacent deep soil zones and meeting best practice benchmarks for urban greening.

These changes support council's objectives for tree retention, biodiversity, and water-sensitive urban design, and have been developed in consultation with landscape architects and arborists.

2. Gregory Place façade articulation

It is acknowledged that the Gregory Place frontage is sensitive, characterised by low-scale single dwellings with fine-grain subdivision and modest setbacks. Although **façade detailing is not part of the current concept SSD approval**, the design guidelines embedded in Section 8.4 of the Tzannes design report provide clear direction for future built form responses. These include:

- **Articulation and modulation of façades into vertical bays**, reflecting traditional terrace and dwelling proportions.
- **Varied setbacks and materiality** to break down scale and avoid the appearance of monolithic street walls.
- **A focus on pedestrian-scaled rhythm** that is relatable to human movement, enhances passive surveillance and strengthens the streetscape experience.

These requirements will be translated into detailed façade plans and materials palettes at the subsequent stage, subject to review under the staged SSD framework.

3. Active residential interface and surveillance

The site planning strategy prioritises **active and semi-active residential interfaces** along all key public spaces, including the Channel Walk, Gregory Place and the internal spine. This includes:

- **Low-rise podium elements**, landscaped thresholds, and seating nodes that create semi-public transitions between private dwellings and the public realm.
- **Clear passive surveillance lines** from habitable rooms and private open spaces over communal and public areas.

- A **mix of planting, walls, and fences** designed to define zones without creating visual or physical barriers.

Section 6.2 of the design report elaborates on this approach, noting that future building designs will be required to deliver high-quality ground floor relationships and safety outcomes. The strategy promotes community interaction and security through design—not through exclusion or enclosure.

4. Delineation of public, communal and private spaces

Clear differentiation of public, communal and private areas is embedded within the concept plan, including:

- **Publicly accessible green spaces and walkways**, including the Channel Walk, central plaza, and passive recreation zones.
- **Communal open spaces** such as internal courtyards, roof gardens (where proposed), and resident-only green areas above basement structure.
- **Private residential terraces and courtyards**, set back and screened appropriately.

These zones are clearly explained in Section 6.1 of the design report (*Public/Private Interface Strategy*), which sets out expectations for fencing, surface treatment, lighting, and landscape character. While **detailed fencing locations and types will be provided at the next stage**, the current strategy ensures legibility and equitable access while supporting amenity and safety.

Conclusion

The concerns raised under this general issue heading are respectfully acknowledged and have been substantively addressed. Importantly, this is a concept SSD application, and does not seek approval for architectural detail, finished levels or fencing treatments. However, the design guidelines and plans submitted provide a clear and enforceable framework for the staged delivery of a high-quality, inclusive and safe residential environment.

The revised basement layout, active edge design, Gregory Place modulation strategy, and public/private interface controls all reflect best practice urban design and landscape principles. These changes support heritage integration, tree retention, safety, social connection, and environmental performance, in accordance with the Housing SEPP and the objectives of the EP&A Act.

Issue: Traffic and Transport

Councils Traffic and Transport Team have reviewed the proposal and wish to provide the following comments:

- *Parking provision – Off-street parking is to be provided in accordance with the requirements of Clause 18 (f) of the SEPP (Housing) 2021 for In-fill affordable housing developments and Clause 74 (2) (d) of the SEPP for Build-to-Rent developments. Details are to be illustrated on the plans submitted with the final DA.*

Applying the above parking rates, the proposed development is required to provide 242 parking spaces. It is noted that based on the submitted Concept Architectural drawings for the proposal, the proposed development will provide 566 residential and 68 visitor parking spaces. This parking provision complies with the minimum requirements of the SEPP.

However, it is requested that parking provision of the proposed development be restricted to maximum 242 residential parking spaces, SEPP parking rate being a maximum given the sites strategic location near the Parramatta CBD and 68 visitor parking spaces (as proposed by the applicant) in order to further minimise the site's traffic generation and its impact on the operation

of the surrounding road network. This reduced parking rate does not warrant a basement across the entire site and any basement/s should be retained under the building footprints only to increase planting and deep soil opportunities.

- *The design and dimensions of the parking spaces, aisles, driveways, gradient, columns, and radii are to be in accordance with the requirements of AS 2890.1-2004. All vehicles are to enter and exit the site in a forward direction. On-site manoeuvring of vehicles into and out of the site and for critical manoeuvring areas within the car parking area are to be demonstrated in accordance with Appendix B of AS 2890.1 – 2004. Details are to be illustrated on the plans submitted with the final DA and this should be secured by way of a condition of consent.*

Council's Traffic and Transport Services section cannot support the proposed development in the current form.

Response

Off-street parking

Refer to the Transport and Accessibility Impact Assessment prepared by STC Consulting. The proposal will deliver 160 affordable housing units, 320 BTR units (inclusive of the 160 affordable housing units), and retail spaces of 140m² GFA. The Housing SEPP specifies minimum parking requirements for affordable housing and BTR dwellings and overrides any requirements set out in DCPs unless DCPs require lower numbers of parking spaces. Notwithstanding the inapplicability of DCPs in SSDAs, the calculation for requirements of other parking spaces, including car parking for retail, accessible parking, bicycle parking, etc. makes reference to the PDCP 2011, noting the original SSDA was lodged when the PDCP 2011 was in force.

Requirements of AS 2890.1-2004

Due to this application being a concept application, the details requested will form part of the detailed design development application where a review of the design and dimensions of the parking spaces, aisles, driveways, gradient, columns, and radii in accordance with the requirements of AS 2890.1-2004.

Issue: Universal Accessibility

The following comments have been provided from Council's Universal Accessibility Officer and should be considered further:

- *A comprehensive access reports by Design Confidence has been provided identifying several issues that will be required to be addressed at the construction certificate (CC) stage of the project. These additional comments are not limited to or replace those mentioned within the access report and does not relinquish the applicant from its obligation to provide a fully compliant detailed universally accessible design.*
- *483 units have been provided; thus, a minimum of 49 accessible/ adaptable units are required as per City of Parramatta DCP.
10% of dwellings to be adaptable, additionally all ground floor dwellings in buildings with no lift and all dwellings in buildings with lift access must be 'visitable' by people with a disability. This means that there must be a continuous accessible path of travel (AS 1428.1:2001) from the street and any visitor parking to and through the entrance door of affected dwellings. Parramatta DCP table 3.4.5.1.*
- *A breakup of the accessible units should be as follows 19 single, 26 two bedroom and 4 three-bedroom units, this will provide suitable equitable breakdown of units.*
- *Ensure a clearly defined accessible paths of travel are provided from the property boundary and connecting all the principal entries of the blocks provided on site as per AS1428.2 and BCA D3.*
- *Low level thresholds should be provided at all doors accessing outdoor areas including the residential, retail, gym, and commercial areas.*

- *The Abutment of differing surfaces shall have a smooth transition. Design transition shall be 0 mm. Construction tolerances shall be as follows:*
 - ± 3 mm vertical.
 - ± 5 mm, provided the edges have a bevelled or rounded edge to reduce the likelihood of tripping. AS1428.1.7.2.
- *Equipment and furniture within the common areas including the gym BBQs and communal areas as per BCA table D3.1 will require universally accessible and inclusive features, suitable for a person with a mobility and other impairments.*

Note; AS1428.2 provides guidance on accessible furniture including, reach ranges and varying heights of tables and seats with back and arm rests.

Response

The applicant acknowledges the importance of ensuring universal access across all stages of the development and welcomes council's proactive identification of future design obligations. However, it is important to clarify that the current application seeks concept approval only. As such, it does not include detailed architectural documentation, floor plans, finished levels, lift configurations, furniture layouts or accessibility infrastructure.

At this stage, the application seeks approval for building envelopes, indicative layouts, and key urban design parameters, with detailed building design to follow through future staged development applications and construction certificate documentation.

To this end, the following responses are provided:

- **Access Report and universal design requirements:** The Design Confidence Access Report was submitted to identify any preliminary issues that may inform the concept stage design. The report confirms that all relevant design obligations under AS 1428.1, AS 1428.2, the NCC (BCA), and the council DCP will be addressed at the detailed design stage. This includes adaptable housing requirements, visitable dwellings, continuous accessible paths of travel, and compliant surface transitions.
- **Adaptable dwelling yield and unit mix:** The current application does not fix the total number of dwellings or the final mix of bedroom types. However, the design guidelines embedded in the concept SSD submission confirm that a minimum of 10% adaptable dwellings will be delivered, in accordance with Parramatta DCP Table 3.4.5.1. This requirement will be further addressed in the future Stage 2 DA, where detailed unit layouts, lift access, and visitability will be demonstrated and certified.
- **Accessible circulation and entries:** All future buildings will be designed to provide clear, continuous, and accessible paths of travel from the public domain and internal road network to principal entries, and from entries to individual dwellings, common areas, and public open spaces. The site layout and design guidelines have already been reviewed with accessibility principles in mind, and will be refined at later stages to comply fully with AS 1428.2 and BCA Part D3.
- **Thresholds, surface abutments and common area fit-out:** These detailed construction matters—such as low-level thresholds, compliant surface junctions, furniture reach ranges and inclusion features in communal areas—are appropriately dealt with at the detailed DA and CC stages. The applicant commits to ensuring that all equipment, finishes and amenities are fully accessible and inclusive, consistent with AS 1428.1, AS 1428.2, and Table D3.1 of the BCA.

Conclusion

While council's comments are noted and appreciated, they relate to a level of design detail that will be resolved in future stages of the SSD process. The current concept SSD application provides an appropriate framework for universal accessibility and includes design guidelines that explicitly require full compliance with the applicable DCP controls, Australian Standards and the Building Code of Australia.

The applicant is committed to delivering a universally accessible, equitable and inclusive residential precinct, and will continue to engage with council's accessibility officers at the detailed design stage to ensure all regulatory and best-practice outcomes are achieved.

Issue: Landscaping and Trees

Of most concern to Council's Landscaping and Trees team is that there is an inadequate setback and tree protection given to a group of significant trees located in the north-western corner and along the western side. The trees identified as T181 Lophostemon confertus requires an 8.4m setback and T190 Lophostemon confertus, T191 Eucalyptus microcorys and T192 Eucalyptus saligna all require a minimum 9.6m setback and not 6m as indicated. This would be a major encroachment and would require the trees to be removed. The buildings should be setback a minimum 9.5m and reflected in the amended architectural plans for building C.

Response

The EIS submission had a setback along the northwestern boundary of 6 metres. Through the reconsideration of the proposal, this setback is now a minimum of 12m extending to a setback in the northwestern corner of approximately 38m. We note the is substantially greater than the minimum 9.5m council note.

Based on the revised design, trees Numbered 181, 190, 191, 192 have been considered and are sufficiently distanced to be safely retained and protected with consideration to the building, carparking and excavation scope of works.

There is an existing roadway adjoining this tree, which runs to a previous used vehicular exit gate. This area would have already been compacted for these works and new design with turning circle only has minor incursions into its TPZ. Any new roadway, kerb and gutter works within its TPZ contrary to this scope of works, are to be hand dug and supervised by the project AQF L5 project Arborist.

Chain mesh safety fencing is to be installed to ensure no building waste, or materials are stored within its TPZ. The use of Ground Protection for root zone protection is undertaken using steel plates or equivalent over a 50-100mm deep aggregate or mulch layer to ensure no ground compaction around this trees TPZ.

No scaffold branches or tree canopy is anticipated to be pruned based on the building setback and roof design. This will retain the trees natural aesthetic form. The tabled carpark and building envelope configuration have been considered, with this tree being protected and managed in accordance with best practice guidelines and Australian Standards - AS 4970-2009 Protection of trees on development sites.

These trees are able to accommodate these works and be unimpacted. No hardscape landscaping is proposed within this trees SRZ to ensure their safe retention and longevity. All works are to be supervised, managed and monitored by an AQF L5 Project Arborist.

Discussion within the AIA

Further discussion within the AIA around the specific tree protection measures and setbacks required to adequately retain and protect these trees through the demolition and construction process is required.

More generally the proposal is to consider the following changes to ensure adequate protection of the trees and landscaping in the site:

- 1. Limited detail has been provided for the 'Green Roof' areas as shown on the environmental strategy plan. Green roof areas can be supported but need to be considered early on in the building design. Maintenance, access, irrigation, drainage for example is to be considered at an early stage of the design to ensure all landscape areas thrive.*
- 2. Soil depth proposed on the podium levels to vary between 800-1200mm to support small, medium and large trees as per the Apartment Design Guide soil requirements. Slab setdown to be incorporated into the design at an early stage to help achieve this.*
- 3. The deepsoil zone is, however, limited to outside the basement where it is further restricted due to the location of the 8m wide accessway road along the northern side, and the wide 'Channel Walk – Clay Cliff Creek Walk being located along the southern side. Consistent with traffic*

- comments it is requested that the basements are restricted to be under the building footprints only to maximise deep soil and planting opportunities.
4. It is recommended the soil volume be contiguous under footpaths and roads, where tree pits are required, to allow tree roots to access maximum soil volume.
 5. It is recommended a soil plan be provided to understand the soil depths and volumes to show the different planting areas on-slab meet the ADG requirements.
 6. A detailed Landscape Plan and a Planting Plan for all the different landscape areas is required at DA stage.
 7. Plant imagery for the 'Ecotone' northern area has been provided using predominantly exotic species, which is not supported. Although it is appreciated that this palette has been designed to reflect some of the colonial history, it is preferable the majority of the planting should be native species, preferably indigenous plant species to recognise and enhance biodiversity conservation within the Parramatta area.
 8. It is recommended the proposed planting schedule should differentiate native and exotic species to ensure the majority of the planting is native.
 9. At present the concept design has shown limited proposed trees along the northern side, indicating a great reliance on the existing trees to the southern side of Hambledon Cottage.
 10. There is little to no private landscape space or buffer indicated on the northern side of the buildings. The 8m wide access road appears to be up against the buildings on the architectural plans, which is not supported.
 11. The proposed trees identified in the planting character for the 'Ecotone' area are generally small exotic species. Trees to be replaced with larger species (minimum 13m height) since they are within the deepsoil zone.
 12. It is highly recommended accessible paths of travel there should be trees planted on both sides of the 8m accessway to create a strong sense of arrival and to provide a distinct vegetative buffer between Hambledon Cottage and the proposed build to rent development.
 13. Plant imagery for the 'Community Heart' central area has been provided using a mix of native and exotic species. There has been reference to bushtucker planting and colonial character landscaping, however, the planting palette has a limited bushtucker plant list.
 14. The plans and EIS make reference to enhancing the creek character, however, the plans show a great reliance on the existing trees located on the southern side of the creek, which is currently inaccessible from the development.
 15. There has been no discussion regarding where the proposed grasses will be planted to enhance the Cumberland Plain Shale Woodland character.
 16. The open space and connections plan suggests several crossings over the creek which is advantageous, however, they have not been shown on the masterplan.
 17. At present the concept design has shown limited proposed trees along the northern side of Clay Cliff Creek walk.
 18. Typical sections indicate only a 6m setback between the basement / building façade and creek edge, where the wide pedestrian path and deepsoil zone is located. This setback is restrictive and does not allow for adequate tree planting to reflect the woodland shale character and feel referenced in the landscape plans and EIS.
 19. It is recommended the buildings step back in places to allow for adequately sized tree planting to be planted at ground level to strengthen the link between the trees on the southern side and reflect the Cumberland Plain Shale Woodland character reference.
 20. Plant imagery for the 'Creek' southern area has been provided using native planting species, however, it is felt that since there has been reference to the Cumberland Plain Shale Woodland then some of the species should be replaced with suitable species reflecting this ecological

community, such as replacing Corymbia citriodora with Corymbia maculata and Rubus rosifolius with Rubus parvifolius for example. In addition, Tasmania lanceolata shrub should be deleted as it is not native to NSW and will not thrive here.

21. *The Arboricultural Impact Assessment (AIA) reads more like a Preliminary Tree Assessment Report and only partially discusses the impacts to the trees associated with the proposed demolition and construction works (roads (services), buildings, landscape, temporary access etc).*
22. *The AIA is impossible to read the tree numbers without using the survey plan, zoomed in on Adobe. The AIA should be updated to have a series of legible tree location plans with the tree numbers shown.*
23. *A tree retention and removal plan should also be provided as part of the AIA.*
24. *Further discussion around the specific tree protection measures is required for the adequate retention of trees along the northern, western and eastern boundary in regards the construction of the proposed the accessway and basement construction.*
25. *Retention of moderate to high retention value trees T158, T159 and 165 along the southern boundary opposite the Clay Cliff Creek should be strongly considered for retention in the amended plans and the future path relocated slightly to meander around these trees.*
26. *A Tree Protection Management Plan (at a legible scale) is required to discuss the site specific impacts, percentage encroachments into the TPZ and specific tree protection measures required.*

Response

1. Green roof

This comment is not relevant to a Concept stage application. When preparing detailed development application documentation, the precinct will be designed with appropriately detailed landscape considerations.

2. Slab setdown levels

Whilst this is a concept application, the proposed building envelopes have adequate provision for soil deps of 1.5m on podium. The appropriate level of detail will be provided with the subsequent detailed design SSDA.

3. Deepsoil zone

The site layout has been reconsidered and now incorporates significant deep soil zones to the north and west of the site. Refer to section 7.4.5 of the design report. The deep soil area of the site is 13.9% or 2,705.2m². This is higher than the requirements of the Apartment design guide minimum requirement of 7% or 1,364m².

4. soil volume be contiguous under footpaths and roads

This comment is not relevant to a Concept stage application. When preparing detailed development application documentation, the precinct will be designed with appropriately detailed landscape considerations.

5. soil plan

This comment is not relevant to a Concept stage application. When preparing detailed development application documentation, the precinct will be designed with appropriately detailed landscape considerations.

6. detailed landscape plan

This comment is not relevant to a Concept stage application. When preparing detailed development application documentation, the precinct will be designed with appropriately detailed landscape considerations.

7. native species

The landscape palette has been reconsidered. Concept allocations are now centred around native species. The design will be further developed along these lines in the detailed design development application.

8. planting schedule should differentiate native and exotic species

The subsequent detailed design SSD will provide this differentiation and ensure the majority of species are native.

9. trees along the northern side

The site layout has been reconsidered and now incorporates significant deep soil zones to the north. This strip of land is intended to support a double lined boulevard of trees that will provide a landscape buffer to the south of the Hambledon Cottage Reserve.

10. private landscape space or buffer

The site layout has been updated to include a landscape buffer that serves as a transition zone between built environments and natural spaces, providing a protective green edge that enhances privacy and reduces noise. This space is densely planted with native vegetation that offers shelter and foraging opportunities for wildlife, contributing to urban biodiversity.

11. Ecotone area

The design and layout of the site has been reimagined. The 'Ecotone area' is now referred to as a landscape buffer zone. Planting in this zone is now made up of existing trees and new native landscaping including larger trees.

12. Trees planted on both sides of the 8m accessway

Trees and landscaping are now proposed to be planted on both sides of the accessway withing the landscape buffer.

Community Heart' central area

The design and layout of the site has been reimagined. The community Heart concept has been revised by providing a series of public, semi public and private communal spaces. While 'bush tucker' is an element of the planting concept the primary consideration of these spaces is native planting.

13. Enhancing the creek character

The creek environment will be enhanced by introducing a channel walk. This will improve safety with surveillance from adjacent residential areas. Amenity will be enhanced from adjacent green spaces and

landscaped zones on both sides of the walk. The introduction of varied setbacks along the channel walk which will enrich the spatial experiences, creating a dynamic and engaging environment that enhances the overall ambiance of the area. Varied building height along Channel Walk will create a more dynamic experience.

14. Cumberland Plain Shale Woodland character

The concept plan proposed is not detailed to the level where the location of individual species will be defined. This work will be included in the detailed development application and construction documentation.

15. crossings over the creek

While the scheme contemplates several crossings across over the creek these are not included on the masterplan as Clay Cliff Creek is a Sydney Water asset and does not belong to the proponent. Any crossing would therefore need to be undertaken in conjunction with Sydney Water.

16. limited proposed trees along the northern side of Clay Cliff Creek walk

The Clay Cliff Creek Stormwater Channel is not within the site assets but proposed bridge connections allow the southern portion of the site to be an extension of the Channel Walk and to be regenerated with native and endemic species.

17. 6m setback between building façade and creek edge

The introduction of varied setbacks along the channel walk which will enrich the spatial experiences, creating a dynamic and engaging environment that enhances the overall ambiance of the area.

18. allow for adequately sized tree planting

A significant portion of the site's deep soil zone is located on the northern and western boundaries to encourage robust, mature tree canopies for significant shading and protection of existing, large trees. Permeable paving and structural soil cells can be used in shared zones and pathways to extend the area for tree root growth and the site's overall stormwater management. This approach ensures that with limited deep soil availability, the existing and proposed trees can thrive and contribute to the ecological health, heat island reduction and connection to Country.

19. Plant imagery for the 'Creek' southern area

The planting palette has been reconsidered with the intention of making the species more appropriate to the local area.

20. Arboricultural Impact Assessment

The tree protection and management through various construction stages have been adequately address in Section 10 Tree Management Plan to Section 10.7 and Appendices C to G.

21. legible tree location plans

updated plans have been included in the report. Tree Numbering in legible font size and plans tabled are included in Section 9.0 Trees Numbered 1 to 223 identified to be retained or removed with red depicting removed trees.

Whilst it may appear a large number of trees are required to be removed, the fact is, the site is heavily weed infested with an extensive amount of TPO Exempt weed species to be removed and or managed regardless of any proposal.

22. tree retention and removal plan

updated plans have been included in the report. Tree Numbering in legible font size and plans tabled are included in Section 9.0 Trees Numbered 1 to 223 identified to be retained or removed with red depicting removed trees.

23. tree protection measures

The tree protection and management through various construction stages have been adequately addressed in Section 10 Tree Management Plan to Section 10.7 and Appendices C to G.

24. trees T158, T159 and 165 along the southern boundary

Trees Numbered as T158, T159 and 165 along the southern boundary opposite the Clay Cliff Creek stormwater channel are not able to be retained as they located within a roadway. However, any

considered loss of moderate to high retention value will be offset through the increased deep soil zone around the perimeter of the site that will meet council’s objectives by provided additional offset planting opportunities with advanced 100lt canopy trees as part of the new landscape. These planting will alleviate any considered short term loss of visual amenity.

25. Tree Protection Management Plan

Tree Numbering in legible font size and plans tabled are included in Section 9.0 Trees Numbered 1 to 223 are identified to be retained or removed with red depicting removed trees and green those to be retained. The drawing shows both SRZ and TPZ requirements.

Furthermore, the new design has taken into consideration these requirements.

Issue: Open Space

- *Removal of Building C to strengthen the heritage parkland setting and provide potential additional public open space that improves capacity to meet additional recreational demand*
- *Basements (if appropriate on flood management grounds) are to be contained under the building footprints and building setbacks are to be increased from the public reserve boundaries and proposed Clay Cliff Creek Walk to better protect existing mature trees and accommodate a wider landscape buffer to reduce amenity impacts*
- *Ensure clear delineation between the existing public reserve and communal open space through pathways or other landscaping treatments*
- *Maximise protection of existing mature boundary trees and use of large-scale canopy species to soften the ground-level interface between the built form and heritage parkland setting*
- *Improve accessibility to the southern reserve through a potential direct connection to the Clay Cliff Creek Walk*
- *Remediation of southern reserve to be consistent with adjoining public reserve, the following conditions are recommended to ensure that the open space is remediated to an appropriate standard:*

Response

The applicant acknowledges the strategic importance of delivering a high-quality open space network that supports recreational demand, enhances landscape continuity, and integrates sensitively with the site’s cultural and ecological context. To that end, the proposal has been revised to increase open space provision, reduce the visual and spatial impact of built form, and improve heritage, landscape and community interface outcomes.

1. Retention of Building C and open space contribution

Council’s recommendation to remove Building C appears to be premised on the expectation that private land be reallocated for public open space purposes. This expectation is not consistent with the statutory planning framework or the enabling SCC issued for this site. However, in response to the concerns raised:

- **Building C has been substantially reduced in height and footprint**, and repositioned further from the north-western boundary to preserve visual openness and spatial connection between Experiment Farm, Hambledon Cottage and Clay Cliff Creek.
- The revised master plan provides a **large central green corridor and multiple perimeter green zones**, offering permeability, public recreation space and deep soil planting capacity.
- These open space contributions—while privately owned—are **designed for public use**, including pedestrian linkages, passive recreation, and landscape interpretation opportunities.

Accordingly, while Building C is retained, the surrounding open space network is robust, generous and landscape-led, and achieves the intended function of a continuous green setting between key heritage items.

2. Basement footprint and deep soil planting

The basement layout has been amended to substantially reduce its extent and is now largely confined to areas directly beneath the approved building envelopes. This design response, which has been confirmed to be appropriate on flood management grounds (refer GRC Hydro Flood Report, Appendix N), allows for:

- Significant deep soil zones along the northern, western and southern edges, enabling the retention of mature trees and planting of large canopy species.
- Above-basement green spaces designed to support 1.5 metres of structural soil, enabling meaningful landscaping and improving ecological function.

This responds directly to council's concerns regarding vegetation protection, landscape permeability and amenity outcomes.

3. Public and communal open space delineation

The revised scheme clearly distinguishes between publicly accessible open spaces—such as the Channel Walk, central green spine and northern shared zone—and communal spaces reserved for residents. Section 6.1 of the Tzannes design report outlines the public/private interface strategy, which includes:

- Clear circulation pathways.
- Spatial hierarchy and legibility.
- Landscape and surface treatment differentiation.
- Natural surveillance and permeability.

The northern shared zone, acting as a landscaped vehicular and pedestrian interface, will further distinguish the development from Hambledon Cottage Reserve while preserving visual and spatial openness.

4. Protection and enhancement of mature boundary trees

Tree protection and canopy enhancement are central to the revised landscape strategy. Measures include:

- Retention of mature trees along the north-western edge of the site.
- Supplementary planting of large canopy species, providing shade, privacy screening and habitat.
- No basement intrusion into root protection zones, enabling soil continuity and healthy growth.

These strategies soften the interface with the heritage parkland setting and restore a vegetated edge appropriate to the site's transitional character.

5. Access to southern reserve and Clay Cliff Creek Walk

The revised concept layout contemplates a future pedestrian connection to the southern reserve; however, it is important to clarify:

- The land south of Clay Cliff Creek and the creek corridor itself are not owned or controlled by the proponent.
- The stormwater channel is owned by Sydney Water, and any future creek crossing or access point would require coordination, approval and delivery by Sydney Water or council as public land managers.

The proposal does not preclude such a connection, and the design maintains permeability and passive sightlines in that direction to preserve this future option.

6. Remediation of southern reserve

The southern reserve area is not included within the proposed development site and is not subject to this application. The land is proposed to remain in its current natural condition. While formal remediation is

not proposed, the landowner intends to maintain the area in a tidy and safe state, consistent with its informal passive landscape character.

Conclusion

The revised concept scheme delivers a landscape-led approach to open space that is respectful, generous and integrated. While Building C is retained, its scale has been reduced and offset by increased setbacks, tree retention and publicly accessible open space. The revised basement design and interface treatments support deep soil planting and reinforce ecological and visual values. The proposal responds to council's intent—where it aligns with site ownership, statutory controls and feasibility—and is consistent with the objectives of the EP&A Act, the Housing SEPP, and Parramatta's landscape and heritage policies.

Issue: Preliminary soil investigation (PSI)

A PSI must be conducted of land to evaluate the suitability of the land for its intended use as parks, open space and recreation. The preliminary soil investigation must be conducted by a suitably qualified person(s) in accordance with the NSW Environment Protection Authority's Guidelines for Consultants Reporting on Contaminated Sites. The preliminary investigation is essentially a desktop exercise with the objectives of:

- *Identifying potential contamination sources, nature of contamination and the affected areas*
- *Highlight areas of potential contamination which may impact the intended land use; and*
- *Inform a detailed investigation and remediation, validation and site audit statements*

Response

A Preliminary Site Investigation and Detailed Phase 2 Contamination Investigation were prepared by Sullivan Environmental Services. The Detailed Phase 2 Contamination Investigation was also submitted with the EIS.

Issue: Detailed Site Investigation (DSI)

A DSI must be conducted by a qualified and experienced land contamination consultant and a draft and final report of the investigation must be supplied to appropriate regulatory authority.

Response

A Preliminary Site Investigation and Detailed Phase 2 Contamination Investigation were prepared by Sullivan Environmental Services. The Detailed Phase 2 Contamination Investigation was also submitted with the initial development application. These two documents together fulfill the objectives of the proposed Preliminary Soil Investigation.

The initial application acknowledges that due to the existing structures on site, there are limitations in these investigations and that further investigation will be required once demolition occurs.

Issue: Remediation Action Plan (RAP)

Draft remediation action plans and validation plans must be submitted to the appropriate regulatory authority and Site Auditor for approval prior to commencement of remedial works. All remedial works must be carried out in accordance with State Environmental Planning Policy (Resilience and Hazards) 2021

Response

A draft Remediation Action Plan including validation requirements was prepared by prepared by Sullivan Environmental Services. This document was submitted with the EIS, and was prepared in accordance with the suite of guidelines made or approved by NSW EPA.

A Site Auditor is not required for these works as Sullivan will act as an independent consultant and will be responsible for ensuring decontamination activities are carried out in accordance with appropriate legislation and standards including State Environmental Planning Policy (Resilience and Hazards) 2021.

Issue: Validation Report (VR)

A validation report must be submitted to appropriate regulatory authority stating that the objectives in the RAP have been achieved and the land is remediated to a standard suitable for the proposed land use.

Response

A validation report will be submitted to appropriate regulatory authority stating that the objectives in the RAP have been achieved and the land is remediated to a standard suitable for the proposed land use following the successful remediation of the site.

Issue: NSW EPA accredited auditor

The proponent shall engage an NSW EPA accredited auditor to undertake an independent review of the site investigation, remediation action plan and validation reports as per Councils Contaminated Land Policy and Procedures. A site audit statement shall be submitted to appropriate regulatory authority prior to commencement of construction works verifying the following:

- *That the primary consultants work complies with all appropriate laws, standards, procedures and relevant NSW Guidelines*
- *That the land is fit for purpose*
- *That an Environment Management Plan is / is not required including post remediation monitoring and ongoing management*

Response

The proponent has engaged Sullivan Environmental Services to prepare the site investigation and remediation action plan and validation requirements.

Sullivan will act as an independent consultant and will be responsible for ensuring decontamination activities are carried out in accordance with appropriate legislation and standards including State Environmental Planning Policy (Resilience and Hazards) 2021. Therefore, a site auditor is not required.

We appreciate the need for a Site Auditor on complex contaminated land clean-up projects, however the proposed site remediation is considered untechnical and conventional to compete, as such the need for a Site Auditor on such a simple project creates needless expense and delay to a project that will provide desperately needed homes to Australian families.

Issue: Waste Services

The application has suggested 36 x 1,100L General Waste MGB's (collected and emptied once a week) and 54 x 360L Recycling Waste MGB's (collected and emptied once a week). For a development of this size Council can provide 3 general waste collections per week and a weekly recycling service, allowing for bin numbers to be reduced to 12 x 1,100L general waste bins and 18 x 1,100L recycling bins. Given this, the applicant should want to review the footprint of their bin room.

From the plans provided, it appears the bin holding area and collection point is at basement level 2. Council requires the bin holding area and collection point to be at street level within the property. Councils waste vehicle is required to enter and exit in a forward direction without the use of a turntable, and the entire trucks travel path has a clearance height of 4.5m.

Details of this is to be provided in the concept plan. Bulky waste storage facilities are also required within the building.

Response

We note this is a concept application, and the extent of detailed resolution is appropriate as part of the future detailed design development application. Notwithstanding, this RTS is accompanied by an updated Waste Management Plan which identified that the conceptual design provides for a loading and waste pick up area in basement level 1 a short distance from the vehicular entry to the building.

While this area is not at street level, it allows vehicles to enter and leave the site in a forward direction, the entire route is 4.5 metres wide. In addition, it offers an enclosed, covered and safe pick up location

for waste collection. This location will offer improved visual and acoustic amenity for residents and neighbours. It is also only a short distance from the street front.

7.5 Consideration of submissions from government agencies

This section considers submissions and feedback from other Government agencies.

7.5.1 Heritage NSW

7.5.2 NSW Heritage Council

While the Proponent has acknowledged the heritage sensitivities of the site and incorporated Connecting with Country principles throughout the design process, HNSW is of the view that the proposed changes do not fully respond to the concerns of the HCAC.

As advised at the meeting, the Heritage Council of NSW visited the locality on 4 April 2023 and resolved at their meeting on 3 May 2023, that the Heritage Council of NSW:

- Notes that, following the site visit, the Council remains concerned with the overall bulk and scale of the development in relation to heritage impacts, and looks forward to the sightline analysis, previously requested.*
- Notes the location is in a precinct of national heritage significance and that ideally, such a location would be retained as an open space, as has been done around Experiment Farm Cottage.*

Issue: Building C height

I can now confirm that the Heritage Council has instructed HNSW that Building C should be no greater than 2-storeys (their previous advice was 4-storeys); and that analysis should also fully illustrate views to and from Gregory Place across the site to the west, and Our Lady of Lebanon church.

Response

The design of Building C has been reviewed and updated in response to feedback received on the exhibited EIS scheme. Refer section 1.4 of the Design report; Key Design Updates for a direct comparison. A first principles approach has been taken to better understanding this area through a comprehensive visual survey (refer updated Visual Impact Assessment), which helped to define a parkland character precinct in this part of the site, enhancing the landscape setting of Hambledon Cottage and Experiment Farm Reserves. Building C built form is then tested and shaped through further visual impact studies and supported by proposed dense vegetation to mitigate the visual impact of the bulk and scale of the building.

- Building C footprint is reduced by over 50%, with its setback from the northwest boundary corner increased from approximately 9.5m to 37.5m. As a result, the shared setback with Experiment Farm has increased from 5m to 14m.
- The base height has been lowered from 7 to 4 storeys, with upper levels further recessed—8m to the north and 10m to the west—before stepping up to 6 storeys, two storeys lower than previously proposed.
- Additional landscape buffers with large canopy trees anticipated to reach 30–40 metres at maturity have been incorporated to screen Building C from Experiment Farm Reserve, enhancing the parkland setting of this area.

The cumulative effect of these design updates mitigate the perceived visual impact of the bulk and scale of Building C when viewed from Experiment Farm Reserve to a low level of significance as demonstrated in the updated Visual Impact Assessment.

Refer to Section 7 of the Tzannes Design report; Concept Design - Architecture for the updated building design, including artist impression of Channel Walk experience near Building C.

Issue: key views

HNSW expressed to the Proponent at the meeting that a considered outcome is required in this sensitive cultural landscape. To achieve this, an accurate assessment of key views from the grounds of Hambledon Cottage and Experiment Farm will need to be prepared for the Heritage Council to sufficiently understand and assess the visual impacts of the whole development.

Response

Please refer to appendix E, the Tzannes VIA, sections 2.2, 2.3 and 2.4 these provide an accurate assessment of key views from the grounds of Hambledon Cottage and Experiment Farm.

The updated Statement of Heritage Impact noted:

- The updated proposed development responds well to the evolved nature of the Harris Park Precinct.
- The entire extent of the updated proposed development is confined within its own site, while creating new opportunities to enhance the settings and public appreciation of the three historic properties by an updated design approach that includes through site pedestrian links along Clay Cliff Creek stormwater channel and larger setbacks to the adjoining Hambledon Cottage property.
- As stated in the Visual Impact Assessment “the impact to the blue sky background of Hambledon Cottage when viewed front on from the Reserve will remain consistent but not identical with the current condition. Existing and proposed vegetation will improve the visual quality of the backdrop to views of Hambledon Cottage and screen the proposed envelope.”
- The view of Hambledon Cottage sits within its landscape setting. The silhouette of Hambledon Cottage is seen against a backdrop of vegetation in both the existing and proposed conditions.
- The updated proposed development will have no or no unacceptable physical or visual impacts on the various 2020 LSJ or GBA Heritage identified cultural landscape indicators.
- In the Statement of Significance of the three SHR listed cottages, no views between these buildings have been identified as a contributing factor to the cultural significance of any of these places. In consultation with GBA Heritage, a comprehensive Visual Impact Assessment has been undertaken by Tzannes, showing that currently there are no visual connection between Hambledon Cottage, Experiment Farm Cottage and Elizabeth Farm Cottage. The updated proposed development will have no adverse visual impact on these SHR listed cottages.

Furthermore, The area has been identified in the PDGP but has not been formally listed on the National Heritage Register. The values discussed in the current Nomination Form are all part of the evolved historic cultural landscape of Harris Park Precinct, and will be protected as the updated proposal is entirely contained within its own site boundary.

The original identification of a larger portion “Harris Park” as a self contained area of National Significance was first used in the maps for REP 28, as discussed in Sub-section 2.2. Harris Park of itself only gains national significance as a direct component of the whole of Parramatta historic cultural landscape. The extent of 200 years of growth and change would make the long term management of a blanket listing extremely difficult.

This degree of significance for the cottages can no longer be considered for the remainder of Harris Park, given the extent of 20th and 21st century development. The cottages only gain the full extent of any national significance, not from their creation and survival but in their larger historic context as an important part of the early European settlement of Parramatta. Therefore, the context of the three cottages cannot be considered of ‘National Significance’.

7.5.3 Heritage NSW – Aboriginal cultural heritage assessments

Issue: Archaeological test excavations

We note that no archaeological test excavations have been conducted, which means that the ACH values on the site have not been identified. Further, the impacts on any ACH values through the proposed development have not been assessed. We therefore consider that the ACHAR in its current form does not adequately address the SEARs.

We acknowledge the unique constraints to testing currently posed by the site. Firstly, it is occupied by buildings and paved surfaces that have not yet been demolished. Secondly, there is potential for soil and groundwater contamination through the activities of the former 1950s factory on the site. This may pose health and environmental risks.

It is recommended in the ACHAR that the test excavation methodology developed, and the ACHAR, will be used to support an application to Heritage NSW for approval to test excavate the site to establish whether an Aboriginal Heritage Impact Permit (AHIP) is required for the proposal. Please note that the requirement for an AHIP is switched off under the SSD assessment pathway.

Advice on EIS

- *We support the ACHAR recommendation that an Aboriginal archaeological research design and test excavation methodology is to be developed for the site based on the results of future contamination assessment and consideration of demolition planning.*
- *The research design and testing methodology should be appropriate for the site and consistent with other Aboriginal archaeological excavation methodologies used at nearby sites in Parramatta to enable comparison of results.*
- *It is recommended that feedback is sought from Heritage NSW on the proposed research design and testing methodology prior to it being provided to the RAPs for comment.*
- *The results of the test excavation program should be used to inform the final design of the development, including possible avoidance of significant ACH values where (if) identified. The test excavation results should also be used to inform the development of appropriate management and mitigation measures for any ACH identified.*

Response

We appreciate Heritage NSW’s acknowledgement of the unique constraints that exist at the 2A Gregory Place site that restrict our undertaking of Aboriginal archaeological test excavation now to establish whether Aboriginal objects are present. There is a need for approval to demolish buildings and to remove large amounts of potentially contaminated fills to reach depths required (at least 1.5m) to archaeologically test in situ deposits that may contain Aboriginal objects.

The archaeological investigation strategy that is developed for the site needs to be first informed by the results of future contamination assessment and will require support from the project RAPs.

Our proposed management of potential Aboriginal archaeological resources at 2A Gregory Place will be developed based on future contamination assessment and building demolition planning.

We propose to inform the project RAPs of the current planning status of the site and will provide them with a copy of this statement and the revised ACHAR.

An Aboriginal archaeological research design and test excavation methodology will be developed that will be appropriate for the site and consistent with other Aboriginal archaeological excavation methodologies used at nearby sites in Parramatta to enable comparison of results.

We propose to seek feedback from Heritage NSW on the proposed archaeological research design and testing methodology prior to it being provided to the RAPs for comment and cultural endorsement.

Unfortunately, as the site is occupied by existing buildings, it is not feasible to undertake the investigations at this time. In order to undertake meaningful investigations it will be necessary for the buildings to be demolished. Demolition will be undertaken once approval for development has occurred.

7.5.4 Fire and Rescue NSW

Issue

It is deemed that the proposal has limited scope and application in regard to special hazards or foreseeable problems in firefighting. FRNSW submit no comments or recommendations for consideration, nor any requirements beyond that specified by applicable legislation.

While there is currently no requirement for a Fire Safety Study, FRNSW may recommend one be undertaken at a later stage should information be provided such that the development is deemed to pose special problems of firefighting or special hazards exist that require additional fire safety and management measures.

Response

Noted.

7.5.5 State Emergency Service

NSW SES reviewed the provided documents and notes that the consent authority will need to ensure that the assessment is considered against the relevant Ministerial Section 9.1 Directions, including 4.3 – Flood Prone Land and is consistent with the NSW Flood Prone Land Policy as set out in the NSW Floodplain Development Manual, 2005 (the Manual). Attention is drawn to the following principles outlined in the Manual which are of importance to the NSW SES role as described above:

Issue: Development should not result in an increase in risk

Development should not result in an increase in risk to life, health or property of people living on the floodplain. The proposed development is within the 1% AEP flood (Lower Parramatta River Floodplain Risk Management Study and Plan, 2005) from Parramatta River and is adjacent to Clay Cliff Creek (a local stormwater channel). Depths in the 1% AEP riverine flood may be up to 1 metre, which is unsafe for vehicles children and the elderly. This is also below the Council's Flood Planning Level (Parramatta Local Environmental Plan). It is estimated to be several metres deep in the PMF (9.3m AHD), which means all building types are considered vulnerable to failure. The proposal would therefore see several hundred people placed at significant risk of flooding.

Response

The proposed development is compliant with council's flood related planning requirements. These requirements have been developed in recognition that development in the vicinity of flood-liable areas should be designed in a manner that is safe for future occupants and the community at large.

Issue: consider the full range of flooding

Risk assessment should consider the full range of flooding, including events up to the Probable Maximum Flood (PMF) and not focus only on the 1% AEP flood. The current flooding information considered with the proposal (in the Scoping Report and EIS) is inadequate and must consider the impacts of the full range of flooding, both riverine and local, and when potential evacuation routes may be cut.

Response

The risk assessment considers events from 5% AEP, 1% AEP, factored 1% AEP, climate change scenario for 1%, and PMF.

Issue: Risk assessment

Risk assessment should have regard to flood warning and evacuation demand on existing and future access/egress routes. Consideration should also be given to the impacts of localised flooding on evacuation routes.

Response

A separate Flood Emergency Response Plan has been developed and provided under separate cover to outline a risk assessment, identify flood warning mechanisms and appropriate evacuation measures.

Issue: self-evacuation

In the context of future development, self-evacuation of the community should be achievable in a manner which is consistent with the NSW SES's principles for evacuation. Evacuation must not require people to drive or walk through flood water.

Response

The local area is highly developed and subject to flooding. The proposed development will be developed to remain safe in the event of flooding and ample shelter will be provided above the PMF level. Whilst evacuation is a preferred strategy, in this highly developed area, evacuation of occupants will serve to confuse and expose occupants to floodwaters which will increase risk to both occupants, others in the community and emergency service workers. As per SES guidelines where it is safer to remain in-situ than evacuate the former should occur in preference and that is what GRC Hydro propose here. This is consistent with all development in the Parramatta CBD.

Issue: 'Shelter in place' strategy

Development strategies relying on deliberate isolation or sheltering in buildings surrounded by flood water are not equivalent, in risk management terms, to evacuation. 'Shelter in place' strategy is not an endorsed flood management strategy by the NSW SES for future development (as contradicted on page 29 and 32 of the Scoping Report and page 88 of the EIS). Such an approach is only considered suitable to allow existing dwellings that are currently at risk to reduce their risk, without increasing the number of people subject to such risk. The flood evacuation constraints in an area should not be used as a reason to justify new development by requiring the new development to have a suitable refuge above the PMF. Allowing such development will increase the number of people exposed to the effects of flooding. Other secondary emergencies such as fires and medical emergencies may occur in buildings isolated by floodwater. During flooding it is likely that there will be a reduced capacity for the relevant emergency service agency to respond in these times. Even relatively brief periods of isolation, in the order of a few hours, can lead to personal medical emergencies that have to be responded to. As identified on page 88 of the EIS, evacuation from the site is dangerous in a PMF due to the depth of floodwater. In addition, this particular proposal includes communications and power infrastructure in the basement. This is likely to be subject to flooding, resulting in outages and thereby increase the flood and secondary risks of the building occupants.

Response

In the local Parramatta context, sheltering at this site can offer safety advantages over evacuation given that evacuating occupants can become confused during an evacuation in the surrounding area (which can be more flood liable than the subject site) and expose occupants to floodwaters which will increase risk to both occupants, others in the community and emergency service workers. As per SES guidelines where it is safer to remain in-situ than evacuate the former should occur in preference and that is what GRC Hydro propose here, consistent with the approach applied to the Parramatta CBD.

Issue: private flood evacuation plans

The NSW SES is opposed to the imposition of development consent conditions requiring private flood evacuation plans rather than the application of sound land use planning and flood risk management. We note that a flood emergency response plan is included in the Flood Risk Management Report.

Response

A FERP has been developed for the site to address agency concerns and document a site-specific approach to flood emergency response which is prudent in order to directly guide occupants actions at the site in the event of an emergency. Having said that, the FERP outlines actions which will be natural responses to flood. That is vertical evacuation. The DCP has incorporated consideration of land use planning and flood risk management and has developed a development matrix based on these considerations. Compliance with this matrix has been demonstrated in this report.

Issue: mass rescue

Development strategies relying on an assumption that mass rescue may be possible where evacuation either fails or is not implemented are not acceptable to the NSW SES. This may occur as a result of failed evacuation at this site, due to the potential depth of floodwater.

Response

The proposed emergency response seeks to eradicate the need for mass rescue by directing occupants to seek refuge well above the PMF level and providing ample on- site support (back-up power, water, supplies and emergency response supplies) to reduce the need for assistance even in the event of secondary risks.

7.5.6 Sydney Water

Issue: Water Servicing

- *The development is within the Ryde Gravity water supply zone and the current trunk system should have adequate capacity to service the proposed development.*
- *Amplifications, adjustments, and/or minor extensions may be required.*

Response

Noted. The proponent will work with Sydney Water and a Water Services Coordinator to understand any upgrade requirements.

Issue: Wastewater Servicing

- *The development is within Rosehill SCAMP and is a part of SPS67 catchment. Currently the property is serviced by a DN225 across the Gregory Pl.*
- *The DN225 wastewater main does not have the capacity to service the development and requires to be upsized. The scope of amplification work is the entire DN225 wastewater main of approximately 700m in length.*

Response

Noted. The proponent will work with Sydney Water and a Water Services Coordinator to understand any upgrade requirements.

Issue: Building over or adjacent to stormwater assets

- *No buildings or permanent structures are to be proposed over the stormwater channel or within 1m from the outside wall of the channel or within the Sydney Water easement whichever is larger. Permanent structures include (but are not limited to) basement car park, hanging balcony, roof eaves, hanging stairs, stormwater pits, stormwater pipes, elevated driveway, basement access or similar structures. This clearance requirement would apply with unlimited depth and height.*

- *The applicant is required to submit the elevation drawings with the stormwater channel/ pipe, to ensure that the proposed buildings and permanent structures are 1m away from the outside face of the stormwater channel and away from the Sydney Water easement.*

Response

A 6 metre setback has been provided to all built structures along the length of the Clay Cliff Creek stormwater channel. The design proposes two additional bridge crossings of the creek. These will be designed and constructed in close consultation with Sydney Water during the detailed design application to ensure the channel is not detrimentally impacted by the development. Please refer to the updated Reference Scheme and the Concept plan included within section 7 of the design report. These documents include the setback along with a landscaped walkway that will protect and enhance the waterway.

Issue: Fence Along the Sydney Water's Stormwater Channel

- *The proponent is required to provide the fencing arrangement along Sydney Water's stormwater assets. Any fence other than 1.2m high pool fencing, 1.8m high colour bond fencing or equivalent should be located at least 1m away from the outside face of the stormwater channel/ asset and supported on piers and piers are to be extended at least 1m below the invert level of the stormwater channel or 1m below the zone of influence of the stormwater channel.*
- *Fencing along the stormwater channel is to be such a way that the flood water and stormwater overland flow are to be able to flow across the fence in both directions. No permission would be given for brick fence, masonry fence or similar along the Sydney Water's stormwater channel, which will prevent the flood water and allow stormwater overland flow to flow across the fence.*

Response

The proponent will provide a fence design for approval by Sydney Water along with a detailed development application. The proponent will not install any fencing along Sydney Water's stormwater assets without the approval of Sydney Water.

Issue: Modification to Sydney Water's Stormwater Channel

The proposed development appears that the proponent has the intention to modify Sydney Water's stormwater channel. No modification to Sydney Water's stormwater channel is to be proposed unless an agreement is reached with Sydney Water prior to the proposal.

Response

The proposed development does not seek to modify Sydney Water's stormwater channel, apart from connection for discharge. We note this submission accepts the direct stormwater discharge subject to the detailed design complying with Sydney Water's requirements.

Issue: Clay Cliff Creek Walk (Heritage Walk)

The proponent needs to ensure that the proposed Clay Cliff Creek walk is located at least 1m away from the outside face of the Clay Cliff Creek wall.

Response

The Clay Cliff Creek walk will be at least 1 metre away from the outside face of the Clay Cliff Creek wall.

Issue: Stormwater connections to Sydney Water's Stormwater Channel

Sydney Water would give permission to make direct stormwater discharge into its stormwater channel from this development site. However, the stormwater connection needs to comply with our stormwater connection requirements. Detailed stormwater connection requirements would be provided when Section 73 application for this development is made to Sydney Water upon obtaining Consent Authority approval.

Response

Noted.

7.5.7 Department of Planning and Environment Water Assessments

Issue

DPE Water has reviewed the Environmental Assessment and provides the following recommendations. The proponent should:

- *provide an assessment of the activities against the ‘minimal impact considerations’ of the NSW Aquifer Interference Policy (AIP).*
- *provide estimates of groundwater take during construction and operation of the proposed development.*
- *ensure sufficient water entitlement is held in a Water Access Licence/s to account for the maximum predicted take for each water source before any take commences (unless an exemption applies).*

Response

Please refer to the response prepared by Hydrogeologist; Reditus (appendix DD) noting that the application seeks concept approval and that the detailed design development application will contain the relevant information.

Minimal impact considerations

The concept SSD (as either permanently drained or temporary dewatering for a tanked basement) is unlikely to exceed the impact assessment criteria given that the drawdown from the concept SSD would be limited to <1m at approximately 65m distance, and that:

- (a) the nearest high-priority GDE is located over 5km distance
- (b) the nearest 3rd or high order stream is over 300m distance, and
- (c) the nearest water supply works is over 100m distance.

As such, the concept SSD could be considered to have ‘Minimal Impact’ under the WMA 2000 and NSW Aquifer Interference Policy, therefore would have the ability to obtain necessary approvals under the WMA 2000.

Once detailed design information is available (providing accurate dimensions of the basement structure), a Site Hydrogeology Report and Dewatering Management Plan, incorporating a groundwater take and impact assessment specific to final SSD design, can be completed to obtain the necessary approvals under the WMA 2000 from the department.

Groundwater take during construction

Conservative preliminary estimates of groundwater take of 4.7 to 57.5ML/year for the concept SSD was provided in the Geotechnical Investigation Report (Alliance 21 February 2022), based on a steady-state groundwater radial flow equation.

Water Access Licence

If required (for volumes >3ML/yr), the purchase a licence would be form part of a condition to a Water Supply Works approval under the WMA 2000, applied for as part of the future detailed design development application.

7.5.8 Transport for NSW

Comment/Recommendation: Car Parking

The site has good access to public transport services including bus, heavy rail and the future light rail. In addition, the site is within a reasonable walking/cycling distance to the CBD and public transport services.

Recommendation:

TfNSW recommend limiting the amount of carparking to further discourage car driving as a preference, and encourage more sustainable modes, consistent with Future Transport 2056 in which Travel Demand Management (TDM) is one of TfNSW top priorities.

Response

Please refer to sections 4.3 and 5.2 of the Transport and Accessibility Impact Assessment prepared by SCT consulting. The new proposed parking complies with relevant controls and documents. Parking demand analysis shows appropriate parking provision based on car ownership data. No significant impacts on on-street parking in the area are expected.

Comment/Recommendation: Walking, Bicycle Parking and End of Trip

A good supply of quality EoT facilities and bicycle parking encourages more walking and cycling mode shares.
Recommendation

- The bicycle parking should be located at the development site at convenient locations, be safe, secured and under cover. Some further guidance on bicycle parking and end of trip facilities can be found in the cycleway design toolkit.
- Explore opportunities to establish or improve walking or cycling connections to/from the site to the CBD and public transport stations/stops.
- *Upgrade the existing footpath along the western side of Gregory Place and along the southern side of Hassall Street, between Gregory Place and opposite house no. 56, to a Shared Path.*

Response

Refer to section 4.2.2 Cycling facilities of the Transport and Accessibility Impact Assessment prepared by SCT consulting.

Only one vehicle access point is proposed at the driveway at the northeastern corner of the development, accessible via Gregory Place. The access point is proposed to be shared between bicycles and other vehicles and will direct all users to the basement car park below. Bicycle parking and end-of-trip facilities are provided on the B1 level, located on the left (to the south) of the entrance before entering the B1 parking area. The location of the cycling facilities enables convenient access for cyclists, separating cyclists from other vehicles and improving safety for all road users.

A total of 353 bicycle parking spaces will be provided. These are divided into 320 spaces for residents and 33 spaces for visitors and retail uses. All bicycle parking is located within the B1 level and is provided in the form of Class B facilities under the AS 2890.3:2015 standards.

The proposal includes developing a Clay Cliff Creek channel walk that will be able to accommodate bicycle use, the cross site links will also improve connectivity for cyclists.

The proposal, as identified in section 5 of the design report substantially opens up the site to both pedestrians and cyclists, increasing permeability and connectivity in both the north-south and east-west directions.

Gregory Place is a quiet street with low vehicular use. It is reasonable to expect that bicycles in this area use the road and a larger portion of the road verge be retained for deep soil vegetation. The footpath along Gregory place is in good condition and does not require upgrade. Upgrading the footpath remote to the site along Hassell Street cannot be reasonably ascribed to the proponent. This footpath sits in front of a council asset not the proponent's asset.

7.6 Consideration of key submissions

7.6.1 The National Trust of Australia (New South Wales) – 1 September 2022

Issue: Hambledon Cottage

The National Trust concerns can be summarised as follows:

- *The proposal will completely destroy the historic setting of Hambledon Cottage, removing its ability to be read with a blue sky background;*
- *The proposal does not consider the impact on the larger setting of Hambledon Cottage, Experiment Farm and Elizabeth Farm;*
- *The proposal increases, rather than decreases, the built footprint of the current site by extending it westwards;*
- *The proposal turns its back on Clay Cliff Creek and ensures this key historic watercourse can only ever remain a concrete stormwater channel, not restored as a natural creek that speaks to its indigenous and colonial importance;*
- *The proposal does not align with any planning controls for the site and will fundamentally change the predominant low-rise character of Harris Park;*
- *The proposal will impact the views and setting from the National Trust's property Experiment Farm and the Sydney Living Museum Property Elizabeth Farm.*

Fundamentally, the factory on this site is a poor outcome for this place and should be removed. The way to remove it however must not be by developing the site with close to 500 apartments.

The purported reductions in height, scale and impact are not sufficient to make this an appropriate proposal for this sensitive location.

Response

Hambledon Cottage blue sky

The main entry to Hambledon Cottage was originally from the east side. The current entry on the north side was provided in the 1850s, showing that the primary elevation of the cottage was on the east side, with a large verandah towards Elizabeth Farm, with its rear secondary buildings located towards the nearby property boundary with Experiment Farm. The original Hambledon Cottage blue sky background was towards the Parramatta CBD, which has been largely impacted by high-rise buildings, and will be further impacted by more high-rise buildings that have been recently approved and are under construction. Accordingly, while the new buildings will have a visual presence to the south of Hambledon Cottage, they are located as the side view of the historic cottage.

The proposed landscape will introduce an unobstructed landscape view corridor from Hambledon Cottage to OLOLC as the publicly accessible Green Spine, linking the landscaped Shared Zone to the channel walk, and providing a visual connection to Hambledon Cottage when viewed from Hassall Street.

The existing blue sky background includes the upper canopies of large trees in Hambledon Cottage grounds and elevations of the redundant factory and OLOLC (refer to the Visual Impact Assessment (VIA)).

The updated proposal provides an uninterrupted view corridor behind Hambledon Cottage, enhancing its backdrop views which are currently obscured by the existing factory on the subject site.

The proposed landscape will introduce an unobstructed landscape view corridor from Hambledon Cottage to OLOLC as the publicly accessible Green Spine, linking the landscaped Shared Zone to the channel walk, and providing a visual connection to Hambledon Cottage when viewed from Hassall Street.

The existing blue sky background includes the upper canopies of large trees in Hambledon Cottage grounds and elevations of the redundant factory and OLOLC (refer to the Tzannes Visual Impact Assessment).

Refer to section 2.2 of the Tzannes VIA (appendix E).

Three cottage setting

The main entry to Hambledon Cottage was originally from the east side. The current entry on the north side was provided in the 1850s, showing that the primary elevation of the cottage was on the east side, with a large verandah towards Elizabeth Farm, with its rear secondary buildings located towards the nearby property boundary with Experiment Farm. Being constructed in 1822, while Harris's Experiment Farm Cottage was constructed in 1835, there was no historic visual and social connection between Hambledon Cottage and Experiment Farm Cottage just as there was none between Macarthur and Harris. There are already many mature trees that block the Hambledon Cottage and Experiment Farm Cottage current visual relationship and these will be retained. The proposal is on land between Hambledon Cottage and Clay Cliff Creek stormwater channel escarpment, occupied from 1875 by Neals cottage. While the updated new buildings will have a visual presence to the south of Hambledon Cottage, they are located as the side view of the historic cottage, and thus will have no adverse impact on its original backdrop, which has been already affected by the high-rise buildings of the Parramatta CBD.

The amended proposed development includes three sub-precincts which have been created to reflect their distinct identities shaped by their settings. The proposed built forms have been carefully developed from co-design process, integrating built form and landscape. The proposed built forms in each sub precinct will reflect their distinct identity and setting.

The amended proposal includes the integration of the built form and landscape to create an appropriate landscape setting which will contribute to and enhance the landscape setting of heritage items in the vicinity.

The larger 'Heritage Context' now includes the evolved character of the Harris Park Precinct.

Increased built footprint

The building footprint on site has been thoughtfully reduced and redistributed. The existing industrial building covers around 9,060m², while the proposed design is approximately 7,000m², marking a reduction of over 20%.

Restoration of Clay Cliff Creek

Clay Cliff Creek was originally a chain of ponds, dependant on water flows, which was replaced by a new stormwater channel. The existing channel's condition demonstrates its poor access and amenity. The key design consideration is opening up the channel to the public by creating a new landscaped walkway adjacent to the channel, enabling its interpretation and appreciation.

The channelisation of the Clay Cliff Creek in early 20th century released significant areas of land in northern precinct (foreground of Elizabeth Farm) for evolutionary development.

On the ground level, the updated proposed development includes the interpretation of Neal's Cottage on the subject site.

Additionally, the Clay Cliff Creek stormwater channel is a Sydney Water asset. No work or development of the channel can be undertaken without Sydney Water's support.

The amended proposal provides varied setback along the channel walk, enriching the spatial experience and creating a dynamic and engaging environment that enhances the overall ambience of the area.

Alignment with planning controls

Given that the updated proposed development is designated as a SSD, the PDCP 2011 does not apply to the project. However, the updated proposed development is consistent with the heritage requirements, guidelines of the PLEP 2011 and PDCP 2011.

The updated proposal responds to heritage requirements of the SCC and SEARs.

Views and setting from Experiment Farm and Elizabeth Farm

There are no views between Hambledon Cottage, the National Trust's property Experiment Farm and the Sydney Living Museum Property Elizabeth Farm. The views are interrupted by land forms and vegetation. The proposed development will not alter this situation.

In the Statement of Significance of the three SHR listed cottages, no views between these buildings have been identified as a contributing factor to the cultural significance of any of these places. In consultation with GBA Heritage, a comprehensive Visual Impact Assessment has been undertaken by Tzannes, showing that currently there are no visual connection between Hambledon Cottage, Experiment Farm Cottage and Elizabeth Farm Cottage. The updated proposed development will have no adverse visual impact on these SHR listed cottages.

It is noted that the analysis by GBA Heritage has identified that the genesis of the DCP view corridors is from a study undertaken in 1997. An aim of this study was to identify views out of and towards historical sites. This study did not consider the historical significance of the views. Regarding the DCP view corridor between Experiment Farm and Hambledon Cottage, Hambledon Cottage originally faced east, with its outbuildings at the rear facing Experiment Farm. Additionally, John Harris and John Macarthur had a bitter relationship, and Experiment Farm was not Harris' initial choice, it is the view of GBA Heritage that there is not historical connection between Elizabeth Farm and Experiment Farm except that they existed at the same point in time.

Issue – Significance of the Cottages

This proposal seeks to permanently obliterate the setting of three of the most important historic places in Australia (discussed in more detail in "Setting"). These three places and their setting are all in public ownership, the purpose of which is to protect them in perpetuity.

Response

These statements of significance for the three SHR listed properties recognise the individual presence within the collective historical story of Parramatta's Colonial period between 1788 - 1844. They are recognised as important surviving physical evidence from that period, which also includes OGHD and Lennox bridge. Therefore, they are not a self-contained group as such. While Elizabeth Farm (1792) and Hambledon (1822) have a direct historical and visual connectivity, Experiment Farm (1835) had no formal historical or visual relationships to the other two properties. A review of the statement of significance for each heritage listed item shows that there is no mention of any physical or visual connection between these three heritage listed items and their grounds, contributing to their heritage significance. A review of the statement of significance shows that the statement of significance for each SHR listed cottage is limited to the cottage itself and its historic association, while the significance of the place prior to European occupation has been overlooked.

Therefore, GBA Heritage and Yerrabingin have prepared a comprehensive combined statement of significance for the overall Harris Park precinct which also considers the heritage listed items in the vicinity (Section 4.2 of the updated Statement of Heritage Impact).

The main entry to Hambledon Cottage was originally from the east side. The current entry on the north side was provided in the 1850s, showing that the primary elevation of the cottage was on the east side,

with a large verandah towards Elizabeth Farm, with its rear secondary buildings located towards the nearby property boundary with Experiment Farm. Being constructed in 1822, while Harris's Experiment Farm Cottage was constructed in 1835, there was no historic visual and social connection between Hambledon Cottage and Experiment Farm Cottage just as there was none between Macarthur and Harris. There are already many mature trees that block the Hambledon Cottage and Experiment Farm Cottage current visual relationship and these will be retained. The proposal is on land between Hambledon Cottage and Clay Cliff Creek stormwater channel escarpment, occupied from 1875 by Neals cottage. While the updated new buildings will have a visual presence to the south of Hambledon Cottage, they are located as the side view of the historic cottage, and thus will have no adverse impact on its original backdrop, which has been already affected by the high-rise buildings of the Parramatta CBD.

The updated proposed development includes three sub-precincts which have been created to reflect their distinct identities shaped by their settings. The proposed built forms have been carefully developed from co-design process, integrating built form and landscape. The proposed built forms in each sub-precinct will reflect their distinct identity and setting.

The updated proposal includes the integration of the built form and landscape to create an appropriate landscape setting which will contribute to and enhance the landscape setting of heritage items in the vicinity.

The larger 'Heritage Context' now includes the evolved character of the Harris Park Precinct, of

Appropriate setbacks are carefully considered and provided to all boundaries. The amended proposal provides an increased setback to the north boundary adjoining Hambledon Cottage, and to the west boundary adjoining Experiment Farm and its reserve, and to the east boundary adjoining Gregory Place. No changes to the south boundary setback are proposed. However, the built forms have been modified to enhance the connection of the channel walk within a network of open spaces.

The updated scheme has refined setback provision to reduce visual impacts on heritage items and improve the channel walk experience:

- Northern boundary setback increased from 10m to 12m to enable a double boulevard of trees and vegetation in landscaped shared zone, enhancing the landscaped backdrop of Hambledon Cottage.
- Gregory Place setback increased from 4.5m to 6m to allow for more trees along street frontage.
- Setback from Clay Cliff Creek stormwater channel is unchanged but more open spaces are connected to the channel walk to provide a varied spatial experience.
- A 30m landscape view corridor has been established between Hambledon Cottage and OLOLC, enhancing visual connectivity and reinforcing the heritage setting.

Refer to Section 1.4 of the design report; Key Design Updates for detailed setback changes, Section 5 Design Framework for explanations of the various setback provisions and updated Statement of Heritage Impact for discussion on heritage impact.

Issue: Lack of Consultations

*Despite purporting to consult widely on this project, we note however that the Consultation list contained in proposal's Consultation Report **only shows consultation** with one of the three owners/managers of these extraordinarily significant heritage items, namely the Parramatta Historical Society. However it appears that these other two site owners were not consulted:*

- The National Trust of Australia (NSW); and

- Sydney Living Museums

This is an astonishing oversight.

Response

Refer to the Forward-Thinking Engagement Report (Appendix Y)

Following feedback from stakeholders and the community during the 2022 engagement, consideration of the submissions and extensive additional engagement, the proponent updated the Concept Plan with a reconstituted consultant team.

The methodology for the engagement to seek input on the updated Concept Plan built on the 2022 engagement approach and comprised invitations to face-to-face briefings and site visits to stakeholder and interest groups including the National Trust and Museums of History NSW (formerly Sydney Living Museums).

The proponent invited the National Trust to a briefing and site walk. Following this invitation, a meeting was scheduled by the Trust in their offices in August 2024 and the proponent presented the updated concept plan. The proponent further offered an opportunity to workshop the updated Concept Plan with their expert committee. The arrangements were not forthcoming, and after multiple follow-up the Trust advised that the workshop would not be needed.

The proponent met with representatives from Elizabeth Farm (Sydney Living Museums, now known as Museums of Heritage NSW) onsite in September 2024. Their focus was on the view lines from the stables upper floor window, and they noted that it would not be impacted due to the advanced greenery on the property which mostly screens views beyond the property boundary. Beyond the Cottage grounds, the representatives were positive about the following:

- the advanced plants in Swann Reserve would screen the view from the reserve to the development
- the reduced building heights and increased setbacks would help to reduce the bulk and scale of the development
- interruptions of the view line from Hambledon Cottage to the Cathedral would be minimised
- the increased connection between Hambledon Cottage and Elizabeth Farm through greater open space and pathways along the creek would be a benefit to the overall heritage precinct
- the increased numbers of people living in the area would potentially be of benefit to Elizabeth Farm
- the intention to plant advanced screening flora along key view lines would soften the development and its relationship to its surroundings.

Issue: Setting

This proposal seeks to permanently obliterate the setting of three of the most important historic places in Australia, all of which remain with us today in public ownership, and their cultural landscape:

- *Elizabeth Farm (1793) – The first item listed on both the Register of the National Trust of Australia (NSW) and the NSW State Heritage Register, and the oldest surviving European construction in Australia;*
- *Experiment Farm (c.1835) – the site of the first European land grant in Australia and the birthplace of agriculture in this country; and*
- *Hambledon Cottage (c.1821) – part of the Elizabeth Farm Estate.*

The existing factory on the site is not a heritage item and later alterations to it have been seriously detrimental to the setting of Hambledon Cottage in particular, however the proposal for this State Significant Development increases the built footprint on this site and uniformly increases the height across the site. It will have a significant and lasting impact on not only these three heritage items but also the surrounding generally low-rise urban fabric.

Response

The updated proposal does not seek to increase the built footprint on the site, but it reduces it by over 1,000m².

Additionally, the updated proposal does not uniformly increase height across the site. The updated proposal considers from a first principles approach, the location of height and built form across the site resulting is a form which responds to each unique boundary condition individually and appropriate.

The area has been identified in the PDCP as an areas of National Significance. The original identification of a larger portion “Harris Park” as a self contained area of National Significance was first used in the maps for REP 28, as discussed in Sub-section 2.2 of the updated Statement of Heritage Impact. Harris Park of itself only gains national significance as a direct component of the whole of Parramatta historic cultural landscape. The extent of 200 years of growth and change would make the long term management of any blanket listing extremely difficult.

This degree of significance for the cottages can no longer be considered for the remainder of Harris Park, given the extent of 20th and 21st century development. The cottages only gain the full extent of any national significance, not from their creation and survival but in their larger historic context as an important part of the early European settlement of Parramatta. Therefore, the context of the three cottages cannot be considered of ‘National Significance’.

Over time, the density of vegetation, and population growth followed by the subdivision of land and subsequent development of the area, have largely impacted on the visual settings of the three cottages, retaining them in their own self- contained curtilage rather being visually combined as a group, notwithstanding the lack of historical connection between the Macarthur estate and the Harris estate.

The southern visual catchment of the subject site is strongly contained by its backdrop of the Clay Cliff Creek channel and escarpment and the various community and residential buildings, including the prominent OLOL Cathedral situated along the ridgeline.

The north-eastern visual catchment comprises the very tall historic trees within the front garden of Hambledon Cottage and the collection of single storey historic buildings with their prominent roof compositions. The north-western catchment comprises public parkland contained by the alignments of Hassell and Harris Streets. Sections of this parkland enhance the northern prospect of Experiment Farm.

The eastern visual catchment currently comprises a row of single storey mid-20th century suburban houses on the opposite side of Gregory Place. It is anticipated that these houses will progressively be replaced with higher and denser residential buildings.

Despite being in relatively close proximity to each other, there was no visual connection between Elizabeth Farm Cottage and Experiment Farm Cottage because of the undulating topography along Alice Street. Given Harris’ bitter relationship with John Macarthur, there was never an historical connection between Elizabeth Farm and Experiment Farm, suggesting the placement of the cottages was intentional.

Hambledon Cottage was originally constructed to face eastward towards Elizabeth Farm, with a large verandah. Constructed in 1822 with its back to the western boundary of the Macarthur Estate, it predates Experiment Farm Cottage, which was constructed in 1835, after John Macarthur’s death. There was no

historic, visual or social connection between Hambledon Cottage and Experiment Farm Cottage. Currently, given the density of vegetation, there are no views to Experiment Farm Cottage from Hambledon Cottage.

The original, westward historic backdrop of Hambledon Cottage is now defined by the dynamic skyline of the Parramatta CBD. Its southern, side backdrop, as seen from Hassell Street, has been defined by the close proximity and visual presence of the subject industrial building, and development on the ridgeline including OLOLC.

Due to subsequent development and density of vegetation in the locality, significant views from Elizabeth Farm Cottage to Hambledon Cottage are no longer available. There are currently some obstructed views to tall historic trees at Hambledon Cottage from Elizabeth Farm and to trees of Elizabeth Farm from Hambledon Cottage, but they exist on a cluttered skyline.

Hambledon Cottage is located on a relatively flat landscape, to the north of Clay Cliff Creek channel. Along with density of vegetation and subsequent development in the locality, Hambledon Cottage had no significant visual connection to the Parramatta River, located some distance to the north.

Several early 20th century houses in front of Experiment Farm Cottage were demolished in the 1970s to recapture the general sense of its northern rural setting. Contemporary large-scale development to the west of Harris Street and the row of tall mature trees on the western end of the subject site have primarily confined its distant views towards the River over parkland and rows of trees.

The 1943 and 2024 aerial photos (Figures 3.3.1 and 3.3.2 of the updated Statement of Heritage Impact) show the extent to which housing and trees have come to dominate or block the surrounding viewing points over the last 70 years of urban evolution.

While these various concepts of “Curtilage” are a useful way of recognising the evolving physical influence of progressive residential subdivisions and subsequent development of the original Macarthur and Harris Estates, it is important to take into account the visual containment of most of the flat topography of the Harris Park locality by rows of mature street trees and parkland trees plus the visual restrictions generated by even single story houses, prevent pedestrian or car drivers from obtaining diagonal views towards the subject site from most of Harris Park.

Issue: View analysis

The National Trust are extremely concerned that the true impact of this proposal, particularly on Hambledon Cottage, has not been accurately represented in this proposal. The Visual Impact Assessment for this proposal of 483 apartments in one of the most visually sensitive locations in Australia contains only seven views, and most of them are irrelevant.

*The Planning Secretary’s Environmental Assessment Requirements (SEARs) for this projects specifically require that the Visual Impact provide a visual analysis of the development from key viewpoints, **including** photomontages or perspectives showing the proposed and likely future development with respect to existing views from the street, nearby reserves and heritage items. Incredibly, however, the visual impact analysis on exhibition:*

- *Does not consider the historic view corridors identified in the 2011 DCP;*
- *Does not contain a single view from within the grounds of Hambledon Cottage;*
- *Does not include any views towards the development from the adjacent state-listed Experiment Farm or Elizabeth Farm properties;*
- *Does not include a single view from the Our Lady of Lebanon Co-Cathedral in Ruse Street;*
- *Does not include a single “public viewing point” from within any of the surrounding public reserves.*

The National Trust are so concerned about the misleading way that this proposal has been promoted that we have decided to produce three of our own visual impact assessments (based on our understanding of the documentation). These illustrate some of the true impact of this proposal, however more work to further document and understand the true visual impact is required.

The National Trust's views for Hambledon Cottage are actually taken from within the publically accessible state heritage listed boundary of this property, and clearly show the visual impact of this proposal.

We totally dispute the claim in the Visual Impact Assessment (p.15) that the visual impact on Hambledon Cottage is Moderate/Low, and the argument that "Hambledon Cottage is subservient to the existing vegetation of the SHR." Hambledon Cottage, Elizabeth Farm and Experiment Farm are not "subservient" to vegetation. They are (individually and collectively) a rare grouping of colonial landscapes, including houses, trees and gardens, that together form a distinctive landscape. The tall Hoop and Bunya Pines are there because of Hambledon Cottage, not the other way around.

We also dispute the findings of the Statement of Heritage Impact (page 99) assessment of material impact, which states that the proposed project will have a "positive impact" on Hambledon's significance because it will "Retain Hambledon cottage, its setting, outbuildings, and landscape. Celebrate the early connection of three cottages ... Ensure visibility and appreciation of Hambledon cottage from the public domain." The images on the following page do not, under any stretch of the imagination, constitute "minor impact" let alone "positive impact."

The SOHI goes on to assess that the project's impact on the significance of Hambledon's setting, (including views and vistas to Elizabeth Farm's surviving early tree plantings, nearby Experiment Farm cottage's estate, and the Queen's Wharf precinct on Parramatta River) will be of only "minor impact" because later subdivision and subsequent development of the area have already obstructed historic distant views and vistas from three heritage listed cottages. The proposed works amplify the impact of the existing factory, they do not negate it. The Trust notes that Heritage NSW's Guide to Material Impact acknowledges this, stating that cumulative adverse impacts may reach the material threshold and "... can have as great an impact on the significance of a SHR listed place as a major change."

*The SOHI finishes its assessment by saying the "proposed height of buildings **might** have an adverse impact on the established significant views of Experiment Farm cottage northward to the Parramatta River, Hambledon cottage, and Clay Cliff Creek" and that this "**will be acceptable impact** on the established heritage significance of the SHR listed items and the HCAs in the vicinity of the subject site." Although the SOHI states that it meets the SEARs requirement that the project is compliant with the relevant Conservation Management Plan (SEARS, section 19 – Environmental Heritage), it does not in fact include an analysis against the CMP. The SOHI references the CMPs of the three cottages in its historical analysis, but it does not demonstrate that it has assessed the project's compliance with any of the CMP Conservation Policies.*

Incredibly, the Visual Impact Assessment (p.15) only assesses "selected viewpoints selected based on public viewing points around the site." It does not assess any of the identified historic view corridors for Harris Park that are identified in the 2011 Parramatta DCP, shown in Figure 4 below.

Response

Please refer to the Visual Impact Assessment prepared by Tzannes. Whilst this document includes a particular focus on views to and from Hambledon Cottage, Experiment Farm and Elizabeth Farm, the Tzannes Visual Impact Assessment, as provided at Appendix E, has carefully and wholistically considered the visual impact of the proposal by firstly undertaking a visual survey to qualify the visual catchment of the proposal and surrounding Heritage and Cultural sites. This survey identified that the flat landscape and extensive existing built form and vegetation greatly impact visibility. Where visibility was identified, it was carefully considered by Tzannes and GBA to ascertain the importance and relevance of the view. Those views, and the views identified in DPE's letter and those raised by stakeholders have been considered in the revised VIA.

Refer to section 2.2 of appendix E the Tzannes VIA. This new document provides detailed comparison views that accurately displays the impact of the updated design. The document provides 31 comparative views from around the site:

- Comparative View 1 - DCP Historic View Corridor 7
- Comparative View 2 - DCP Historic View Corridor 8
- Comparative View 3 - DCP Historic View Corridor 9
- Comparative View 4 - Experiment Farm Reserve Looking Northeast
- Comparative View 5 - Experiment Farm Reserve Looking East
- Comparative View 6 - Hambledon Cottage
- Comparative View 7 - Hambledon Cottage
- Comparative View 8 - Hambledon Cottage
- Comparative View 9 - Hambledon Cottage
- Comparative View 10 - Hambledon Cottage
- Comparative View 11 - Hambledon Cottage
- Comparative View 12 - OLOLC Grounds
- Comparative View 13 - OLOLC Grounds
- Comparative View 14 - Heritage Walk - Purchase St view of Hambledon Cottage
- Comparative View 15 - Heritage Walk Experiment Farm Reserve view to Site
- Comparative View 16 - Heritage Walk Alfred St view to Site
- Comparative View 17 - Heritage Walk Swann Reserve view to Site
- Comparative View 18 - Heritage Walk Gregory Place view to Site
- Comparative View 19 - Heritage Walk Hassall St view to Hambledon Cottage
- Comparative View 20 - Heritage Walk Hassall St view to Site
- Comparative View 21 - Heritage Walk Reserve View to Site
- Comparative View 22 - Alfred St Looking to OLOLC
- Comparative View 23 - Corner Hassall and Alfred St Looking to OLOLC
- Comparative View 24 - Corner Hassall and Gregory Place Looking to Hambledon Cottage
- Comparative View 25 - Gregory Place Looking to Site
- Comparative View 26 - Hassall St Looking to Site
- Comparative View 27 - Ruse St Dwelling to Site
- Comparative View 28 - Oak Street
- Comparative View 29 - Intersection of Alfred and George Street

- Comparative View 30 - Purchase Street
- Comparative View 31 - Purchase Street

These images demonstrate that the development:

- Will not destroy the historic setting of Hambledon Cottage, removing its ability to be read with a blue sky background.
- Will not significantly impact the views and setting from the National Trust's property Experiment Farm and the Sydney Living Museum Property Elizabeth Farm.
- Considers the historic view corridors identified in the 2011 DCP
- Includes a view from within the grounds of Hambledon Cottage
- includes views towards the development from the adjacent state-listed Experiment Farm and Elizabeth Farm properties
- Includes a view from the Our Lady of Lebanon Co-Cathedral in Ruse Street
- includes "public viewing points" from within surrounding public reserves.
- assesses the identified historic view corridors for Harris Park that are identified in the 2011 Parramatta DCP

It is noted that the analysis by GBA Heritage has identified that the genesis of the DCP view corridors is from a study undertaken in 1997. An aim of this study was to identify views out of and towards historical sites. This study did not consider the historical significance of the views. Regarding the DCP view corridor between Experiment Farm and Hambledon Cottage, Hambledon Cottage originally faced east, with its outbuildings at the rear facing Experiment Farm. Additionally, John Harris and John Macarthur had a bitter relationship, and Experiment Farm was not Harris' initial choice, it is the view of GBA Heritage that there is not historical connection between Elizabeth Farm and Experiment Farm.

Furthermore, a review of the statement of significance for each heritage listed item shows that there is no mention of any physical or visual connection between these three heritage listed items and their grounds, contributing to their heritage significance.

Issue: National Trust Recommendation

The National Trust feel that a proper accurate and legitimate Visual Impact Assessment of this proposal must be produced and the public exhibition period recommenced with this information made available. As it stands the proposal is not able to be accurately understood in terms of its significant detrimental impact on this important setting.

Response

As part of the response to concerns raised by interested organisations and members of the public, the concept design has been updated to address the contentious issues raised. Along with the updated design an updated Visual Impact Assessment has been prepared. This document provides a more comprehensive response to views and specifically includes several views identified as being a requirement to this work.

Issue: Efforts to Improve the Setting

*The Concept design report (p.19) notes that "the Cottages were once surrounded by a parkland setting that has diminished over time". While this is of course true in some respects, it ignores the significant efforts by the community and government over many years to, in fact, **increase** the parkland setting of*

Experiment Farm and Hambledon Cottage. Experiment Farm Cottage was acquired by the National Trust (NSW) in 1961 and was the first property to be bought by the Trust. Since that time, the National Trust and Parramatta City Council have acquired several adjoining lots to the north and south of the cottage, and demolished the later houses that had been built on those blocks to allow for open space surrounding the house, ensure an appropriate setting was established and to protect important viewlines.

As a result of these efforts, public land now extends immediately to the north of Experiment Farm which reflects the original land grant and setting of this property. This land immediately abuts the current proposal which will significantly destroy the setting of this building and its public curtilage.

This is a core National Trust objection to the current proposal – that the proposed project amplifies the impact of intrusive developments and directly opposes the active work of government and community to protect and enhance the setting and views of these three places.

Response

Appropriate setbacks are carefully considered and provided to all boundaries. The updated proposal provides an increased setback to the north boundary adjoining Hambledon Cottage, and to the west boundary adjoining Experiment Farm and its reserve, and to the east boundary adjoining Gregory Place. Changes to the south boundary see increased building openings and form modulation to enhance the connection of the channel walk within a network of open spaces.

Issue: Archaeological Assessment and Recommendations

The Trust does not agree with the findings of the Historical Archaeological Impact Assessment that has been tabled in support of this project.

The documentation concludes that there is very little potential for significant archaeological resources due to the ground disturbance of the existing factory. However, the report does not provide detail of the construction and subsurface works of the factory to support this statement. Nor does it take into account the propensity of developments in Parramatta to often, in fact, reveal substantial, intact remnant archaeological features. No reference to this comparative data has been supplied.

The report relies on the detailed assessment presented in the Parramatta Historical Archaeology Landscape Management study (GML Heritage, 2000) which assesses archaeological significance of this 2 Gregory Place Harris Park to be likely be of potential “local” significance and therefore recommends no further archaeological works. However, PHALMS was written and published when the NSW Heritage Act did not distinguish between local and state archaeological heritage value – it required archaeological permits for works to both types of sites. Specifically for 2 Gregory Street, it recommended test pits and further re-assessment before work can be planned or approved.

Given the high presence of early European occupation in archaeological deposits in Parramatta in general and the high potential significance of archaeological remnants related to these three early cottages and their story, we consider that the works should trigger the need, at a bare minimum, further archaeological assessment including test pitting. No approval of the project should be undertaken until this work is done.

Response

We acknowledge that the Trust does not agree with the findings of our historical archaeological impact assessment of the site. The project archaeologist has addressed a number of issues that have been raised in the Trust submission.

We conclude from our analyses of historical maps and descriptions and aerial photographs along with current geotechnical data for the site that there is low potential for intact and significant archaeological resources to be present and survive at the site due to the depth of ground disturbance that has occurred from the construction of the existing factory (1950s) and adjacent stormwater drain (c.1917).

Geotechnical data shows the original ground surfaces below the factory have been cut down and have been lowered by construction by about 1.5m and that below the factory floor surfaces are thick deposits of uncontrolled fill (1.5m) that are underlain by two units of floodplain alluvium deposit (5.9m thick) over bedrock. We have predicted that the potential historical archaeological soil profiles beneath the factory

with the potential to contain relics have been cut down to a depth that is likely to have largely truncated and removed colonial-period ground surface and subsurface soil levels and all associated archaeology within that truncation depth.

We have used the Parramatta Historical Archaeology Landscape Management Study (PHALMS 2000) as a source for understanding the history of the land and the potential archaeology that may result from this land use because the landscape and historical and archaeological research that underpins the study is still valid despite its age. We acknowledge that we do not draw upon detailed comparative archaeological analysis primarily because there have not been any comparable historical excavations undertaken in Harris Park with the same level of landscape alteration and subsurface impact to draw comparison with. However, we have not used PHALMS solely as a source and basis to assign a local level of archaeological significance to the predicted archaeology at the site. Rather, we have used a standard and NSW Heritage Council criteria based assessment and evaluation method to establish whether potential relics meet the threshold to be considered of State or local significance.

We agree with the Trust that the site requires archaeological testing and reiterate constraints that currently exist to prohibit undertaking test excavation at this time which are testing will require approval to demolish buildings and to remove large amounts of fills. Contaminated soils may also require remediation.

We propose that the future identification of relics on the site can be achieved through archaeological monitoring and recording of earthworks following building demolition and any relics identified will be test excavated and salvaged through archaeological excavation before development. The findings of future contamination assessments and building demolition planning when available will enable the development of an archaeological monitoring approach and test and salvage excavation methodology for the site.

Issue: The proposal does not satisfy any planning controls for the place

Whilst we acknowledge that the Development Control Plan (DCP) does not require mandatory consideration under this Concept application, we argue that due to this being an Area of National Significance, and given that the later stages of development will have to consider the DCP, that this Concept application should also consider the DCP and be compliant with its provisions.

The Parramatta DCP 2011 is a forward-thinking document with very clear guidelines on the important role that the site at 2a Gregory Place can play in the future of Parramatta. It is so important to the preservation of this area that it is identified as “Key Block One” and the DCP (p.4.3-23) notes that:

This site has the potential to be a ‘linchpin’ site in terms of appreciating the colonial history of the area. In the event of any redevelopment of this site, opportunities should be taken up to improve links between the three key historic sites of Hambledon Cottage, Experiment Farm and Elizabeth Farm House, and provide improved interpretation of Clay Cliff Creek.

The proposal will necessarily have impacts associated with vehicular movements, parking, flooding etc and we trust that people more qualified will assess these impacts. The DCP identifies numerous issues, objectives and controls for the site and its setting which relate particularly to heritage and the National Trust has assessed these in the table below.

Harris Park Precinct, Area of National Significance

2011 Parramatta DCP Controls	National Trust comment
C.1	<i>Before granting consent for development within the Area of National Significance, the consent authority must be satisfied that:</i>
	The scale of this development, its siting immediately adjacent to Clay Cliff Creek and Hambledon Cottage, and its position as the

<i>a) the scale, form, siting, materials and use of new development will not adversely affect the heritage significance of the Area of National Significance,</i>	linchpin of three items on the State Heritage Register will have a dramatic and irreversible negative impact on the heritage significance of the Area of National Significance.
<i>b) the existing allotment and development pattern, and the natural landform of the Area of National Significance will be maintained,</i>	The lot does not conform to the existing development pattern of the area, and the large bulk of the proposed buildings accentuates rather than ameliorates the impact this has on the surrounding area. The natural landform of the place (adjacent to the creek) is naturally a low point in the area, but this proposal will in fact reverse that and make this one of the areas of greatest height.

Harris Park Precinct, Area of National Significance

2011 Parramatta DCP Controls	National Trust comment
<i>c) the original course of Clay Cliff Creek (as shown on the Harris Park Precinct Design Control Map) will be re-established or, if that is not reasonably practicable, permanent evidence of its original course will be provided by way of signs or other interpretative aids, and</i>	This proposal will permanently destroy any meaningful opportunity to restore and interpret Clay Cliff Creek. The creek will need to remain a narrow, concrete watercourse running to the rear of a series of large apartment buildings, rather than having the opportunity to connect the historic properties within the Area of National Significance.
<i>d) that development does not impact upon or adversely affect the existing views into and out of the sites of Elizabeth Farm House, Experiment Farm Cottage and Hambledon Cottage, the Female Orphan School (University of Western Sydney Rydalmere Campus), the Parramatta River corridor and the Pennant Hills open space ridge line.</i>	This proposal will have significant major adverse impacts on views both to and from the sites of Elizabeth Farm House, Experiment Farm Cottage and Hambledon Cottage. It may also impact other noted views. None of these impacts have been addressed in the views analysis that has been presented with this proposal. The National Trust in particular would note that the land in our ownership immediately to the north of Experiment Farm, which is used for educational purposes associated with the agricultural significance of the place, will be permanently affected.

Harris Park River Area

2011 Parramatta DCP Controls	National Trust comment
C.2 <i>Before granting consent for development within the Harris Park River Special Area, the consent authority must consider:</i>	
<i>a) whether all reasonable opportunities to re-establish foreshore public land are taken up,</i>	This site offers an incredible opportunity to continue the efforts over many years to re-establish the setting of Hambledon Cottage, Elizabeth Farm and Experiment Farm by re-establishing the foreshore and indeed the very nature of Clay Cliff Creek. This proposal surely must highlight the need for this site to be in public ownership once and for all.

	<i>b) whether the development retains and enhances open space links along the Parramatta River foreshore,</i>	This site provides an opportunity to connect several open spaces which link to the Parramatta River foreshore. This proposal will not retain or enhance any of these open space links, and in fact removes the potential for these to be re-established in the future.
	<i>c) whether the development retains and enhances open space links between Elizabeth Farm House, Experiment Farm Cottage, Hambledon Cottage and the Parramatta River foreshore,</i>	This is the most important control that is affected by this proposal. The site of this proposal is the linchpin of the open space links between Elizabeth Farm House, Experiment Farm Cottage, Hambledon Cottage and the Parramatta River foreshore.

1. Harris Park Precinct, Area of National Significance

2011 Parramatta DCP Controls	National Trust comment
	<i>and facilitates or enhances the views and public access between the historic places in the Harris Park Precinct,</i>
	This proposal, occupying the entirety of the site, does not retain or enhance any of the existing or possible future open space links, views and public access associated with these historic places. It will have a serious detrimental impact on not only Hambledon Cottage but also on Experiment Farm and Elizabeth Farm – all places of exceptional heritage significance that were saved for the public through the foresight of past generations.

The site also sits within the Harris Park Precinct and the DCP (p.4.3 - 13) makes very clear what the desired future character of this area is:

Harris Park contains some of the most important parts of Parramatta's heritage. It has an extensive collection of nineteenth and early twentieth century houses, shops, public buildings and landscapes. Of particular note are Australia's first land grant and oldest European building, Elizabeth Farm House, as well as two other important colonial houses, Experiment Farm and Hambledon Cottage. The preservation and enhancement of Harris Park's historic fabric is essential. The area also has an important strategic role in providing residential development because of its location on the fringe of the Parramatta CBD. All new development will need to be at a scale that is consistent with the existing character of the streets, not impede view corridors to major landscapes and the escarpment north of the Parramatta River, and provide opportunities to connect with the foreshore.

This proposal is completely at odds with the stated objectives for Harris Park. There are numerous other locations and opportunities for housing to be built in Parramatta and Harris Park, but this is not one of them.

2. Harris Park Precinct

2011 Parramatta DCP Objectives	National Trust comment
O.1	<i>Conserve the heritage character of the locality and preserve those areas and sites that present as important cultural/tourist attractions.</i>
	The proposal is completely at odds with the heritage character of the locality. It will completely destroy the amenity of Hambledon Cottage in particular and also affect the cultural and tourism potential of Experiment Farm and Elizabeth Farm

O.2	<i>Retain the character and amenity of the area.</i>	The proposal for three extremely large apartment buildings containing 483 dwellings will completely destroy the character and amenity of the Harris Park area and the Area of National Significance in particular. This is an area of historic value with low-rise buildings. Any existing anomalies within the area and the site itself must serve as warnings, not as precedents.
O.4	<i>New development in Harris Park should be compatible with the scale of existing development and represents high quality urban design.</i>	This development will set a new bar for the very worst in urban design. This proposal imposes itself upon a very important cultural landscape and exceeds all current controls designed to protect the urban and historic fabric of this area. It does not relate in any way to its historic setting, topography, traffic patterns, or existing pedestrian and open space networks.
O.5	<i>Protect and enhance the local and regional biodiversity, maximising the extent and integrity of aquatic and natural land areas, particularly the Parramatta River and Clay Cliff Creek corridors.</i>	This proposal does not engage with the numerous possibilities for restoring Clay Cliff Creek and increasing the biodiversity of the area. This proposal will decrease the area of natural (ie: not built upon) ground plane within the site in areas that are immediately adjacent to areas of public parkland.
O.10	<i>Protect and maintain the specific attributes and qualities of each of the Special Areas.</i>	The very specific attributes and qualities of the Harris Park Area are adversely affected by this

The 2011 DCP (Section 4.4.3.2) also makes special mention of Experiment Farm and defines the Experiment Farm Conservation Area largely based on the 30 acres of James Ruse's Experiment Farm – the first land grant proclaimed in Australia. The DCP notes the history of the site and the more recent efforts to create an appropriate setting for the house, and describes the "sense of spaciousness" in the area which is focused around Experiment Farm Cottage.

This proposal is immediately adjacent to this Conservation Area and must be considered in this context. The existing 9m height limit clearly reflects the aims and objectives of the precinct and the proposed development would demonstrate a dramatic shift in scale that would, it must be expected, lead to further developments of the same size and bulk in the area.

The following objectives relating to the Experiment Farm Conservation Area are relevant to this proposal:

Experiment Farm Conservation Area		
2011 Parramatta DCP Objectives		National Trust comment
O.1	<i>Protect all the attributes which contribute to the heritage value and character of the Experiment Farm Conservation Area, and to maintain and improve its residential amenity.</i>	The connections, both physical and visual (including a view of open sky) between Experiment Farm, Hambleton Cottage and Elizabeth Farm, are extremely important. This proposal will not maintain or improve any of these important attributes, but in many instances will have a negative impact upon them.

O.2	<i>Ensure that Experiment Farm will always have an appropriate setting so that it can continue to tell the history of Colonial Australia to citizens and international visitors.</i>	This proposal will materially alter the setting of Experiment Farm, including its open, publicly accessible space to the north which immediately abuts 2a Gregory Place. The open area in front of the house is used for educational purposes by the National Trust to conduct school excursions and agricultural experiments. This proposal will overlook and overshadow this land.
O.4	<i>Maintain the low scale suburban character of the area.</i>	This proposal, for 483 apartments, is not in keeping with the low-scale suburban character of this area and will affect the Experiment Farm Conservation Area which it is adjacent to.

Response

Notwithstanding that DCPs do not apply to SSD Applications, the updated Statement of Heritage Impact considers the PDCP in section 8.10.

To address a number of salient comments made in the above we note:

- National Significance. GBA Heritage in their expensive analysis on the wider Harris Park Precinct have noted that Harris Park of itself only gains national significance as a direct component of the whole of Parramatta historic cultural landscape. It is not within a triangle created by connecting Hambledon Cottage, Experiment Farm and Elizabeth Farm.
- Clay Cliff Creek. Regarding the original water course alignment, the river valley landscape around the site has shifted and changed over thousands of years in relation to wider global climate changes. Around the time of European colonisation of the site, what is now the channelised Clay Cliff Creek stormwater channel was a chain of ephemeral freshwater ponds. As described in the 2025 Aboriginal Cultural Heritage Assessment Report prepared by Dominic Steele Consulting Archaeology:

Before the colonisation, watercourses were discontinuous chains of ponds and wetlands that relied on heavy rain to overflow the ponds and join them into a stream. The ponds drought-proofed the land by keeping water available for plants, animals and people. Settler activity disrupted this by draining the wetlands, clearing vegetation, grazing sheep and cattle and introducing rabbits. These activities caused rain to bite into watercourses, converting the chains of ponds into continuous streams in incised channels up to 15 metres deep, with water draining quickly away.

It is likely the landscape between Clay Cliff Creek and the Parramatta River had uneven and low-lying surface topography that features chain of ponds drainage and swampy meadows formation vegetation and ecologies.

The access to fresh water that would have made it a suitable location for the establishment of the early colonial agricultural projects in the area would also have made it a valuable place for Burramattagul people pre colonisation. The historic chain of ponds was replaced by a new stormwater channel, removing traces of the pre-colonial life on Country. For this reason, the Statement of Heritage Impact, and other reports, refer to this watercourse as a ‘stormwater Channel’, and the channel isn’t proposed to be ‘restored’.

- Enhancement of History. The proposal considers and addresses continual occupation and interpretation of the site, from First Nations, colonial history and modern society. It does this to connect and make relevant the whole and continual history to all.
- Agricultural Experiments. We are unaware of agricultural experiments being undertaken in Experiment Farm Reserve. Notwithstanding, the updated proposal has self-imposed the solar access provisions applicable to the CBD.
- Site in Public Ownership. The site was purchased on the open market by the proponent. There have been no attempts to purchase this site and convert it into public ownership.

Issue: Comment of Nature of Proposal

The subject site has been subject to a number of proposals over a number of years, and this is outlined in the submitted documentation. This latest proposal is seeking to promote its public benefit by making it an “affordable housing and build-to-rent” proposal, however the nature of the proposal is not of relevance in this extremely sensitive site. Whether it is affordable housing, a luxury development or a factory, the impact will be the same – a terrible outcome for one of Australia’s most important historic landscapes.

Response

The proposal seeks to, as it has over the course of its redevelopment history, to reposition the site by replacing an underutilised and rundown industrial building. Whilst the opportunity exists to replace the building with a modern industrial development, the benefits of the proposal, addressing an acute housing shortage, providing homes for families, providing a heritage interpretation which doesn’t only consider colonial occupation but extends from First Nations occupation over 60,000 years ago to modern day, and open up the sites permeability, are not achieved through a new industrial development.

The evidence presented in this Response to Submissions Report in section 2n clearly demonstrates that Parramatta faces a substantial and growing shortfall in both overall housing supply and affordable rental housing. Despite recent additions to the housing stock, population growth has consistently outstripped dwelling approvals and completions, resulting in a widening gap that cannot be closed by current trends alone. Rental vacancies are at historically low levels and rents have escalated rapidly, outpacing wage growth and placing significant pressure on households across a range of income brackets. The council is unlikely to meet its government-mandated housing targets by 2029, even with projected increases in approvals, and will continue to face a cumulative deficit of dwellings unless substantial new projects are delivered.

Within this context, the Gregory Place proposal represents a timely and strategic response to the documented demand, delivering well-located, high-amenity dwellings that are affordable to a diverse mix of households, including key workers, families, and those otherwise at risk of housing stress. The proposal is consistent with State and local planning objectives and responds directly to the housing crisis articulated by the NSW Productivity Commission and other independent experts. The evidence base for intervention is overwhelming, and the case for new, fit-for-purpose affordable housing in Parramatta is clear and compelling. The Gregory Place development will not solve the entire housing crisis, but it represents a necessary and positive step forward.

Issue: Conclusion

The National Trust are greatly concerned about this proposal. It undermines the setting for three of the most important heritage sites in Australia, destroys the visual setting of Hambledon Cottage, and extinguishes any possibility for the restoration of Clay Cliff Creek. Most concerning, the actual nature of the proposal has been misrepresented and the documentation placed on exhibition does not allow the impact of the proposal to be understood by the public.

The Statement of Heritage Impact argues that the proposed development “is considered sympathetic to the adjacent heritage items” (p.119) and the recommendation that “the consent Authority should have no hesitation, from a heritage perspective, in approving the application” (p.125). We are at a loss to understand how this assessment could be made with such clear disregard for the heritage values of these important places of National Significance. The purported economic, commercial and social benefits of this modification do not outweigh its considerable, negative effects. The Trust object in the strongest possible way to this proposal and call for it to be rejected.

Response

The updated Statement of Heritage Impact notes the following benefits of the updated proposal.

- The updated proposed development will provide an opportunity to connect with and regenerate country. The updated proposed development is founded on First Nations values, engagement, and place analysis. By incorporating First Nations values and engagement, the updated proposed development will add a new pre-Colonial interpretative context to the Harris Park Precinct and the heritage listed items in the locality. The updated proposed development will enhance the existing cultural significance of the precinct by integrating pre-Colonial and contemporary multi-cultural design elements.
- Being occupied by a disused industrial building that does not contribute to the Harris Park Precinct and locality, the updated proposal includes the removal of the redundant factory after 75 years to release new opportunities for the setting and public connectivity, views along the south side of Hambledon Cottage, upgrade Clay Cliff Creek escarpment and improved direct access between Elizabeth Farm and Experiment Farm. Thus, the updated proposed well-designed development will enhance the relationship of the subject site with the heritage listed items in the vicinity and with the wider locality, and will contribute to the understanding of the place and its historical significance through a wider tense.
- The updated proposed development will create three built zones including Gregory Place, Community Hub, and Parkland Setting, each of which will reflect their distinct identities shaped by their settings. The updated proposed development has been carefully designed and distributed within the subject site to reduce any adverse heritage impact on the heritage listed items in the vicinity, and the residential character of the Harris Park locality.
- The updated proposal will have a positive impact on the subject site, the heritage items in the vicinity, and the Harris Park Precinct.

7.6.2 Parramatta & District Historical Society – 29 August 2022

The Parramatta and District Historical Society main concerns are summarised as:-

Issue: Detrimental visual impact

The cottage and its parkland setting amongst historic grand trees is widely recognised as one of the most important heritage vistas in Australia. This development will have an extremely detrimental visual impact on this site. Unfortunately, the limited views provided in the proposal do not accurately reflect this negative visual impact.

Response

Refer to section 2.2 of appendix E the Tzannes VIA. This new document provides detailed comparison views that accurately displays the impact of the updated design. The document provides 31 comparative views form around the site:

- Comparative View 1 - DCP Historic View Corridor 7

- Comparative View 2 - DCP Historic View Corridor 8
- Comparative View 3 - DCP Historic View Corridor 9
- Comparative View 4 - Experiment Farm Reserve Looking Northeast
- Comparative View 5 - Experiment Farm Reserve Looking East
- Comparative View 6 - Hambledon Cottage
- Comparative View 7 - Hambledon Cottage
- Comparative View 8 - Hambledon Cottage
- Comparative View 9 - Hambledon Cottage
- Comparative View 10 - Hambledon Cottage
- Comparative View 11 - Hambledon Cottage
- Comparative View 12 - OLOLC Grounds
- Comparative View 13 - OLOLC Grounds
- Comparative View 14 - Heritage Walk - Purchase St view of Hambledon Cottage
- Comparative View 15 - Heritage Walk Experiment Farm Reserve view to Site
- Comparative View 16 - Heritage Walk Alfred St view to Site
- Comparative View 17 - Heritage Walk Swann Reserve view to Site
- Comparative View 18 - Heritage Walk Gregory Place view to Site
- Comparative View 19 - Heritage Walk Hassall St view to Hambledon Cottage
- Comparative View 20 - Heritage Walk Hassall St view to Site
- Comparative View 21 - Heritage Walk Reserve View to Site
- Comparative View 22 - Alfred St Looking to OLOLC
- Comparative View 23 - Corner Hassall and Alfred St Looking to OLOLC
- Comparative View 24 - Corner Hassall and Gregory Place Looking to Hambledon Cottage
- Comparative View 25 - Gregory Place Looking to Site
- Comparative View 26 - Hassall St Looking to Site
- Comparative View 27 - Ruse St Dwelling to Site
- Comparative View 28 - Oak Street
- Comparative View 29 - Intersection of Alfred and George Street
- Comparative View 30 - Purchase Street
- Comparative View 31 - Purchase Street

Issue: Background of Hambledon Cottage

The new buildings would clearly dominate the background of Hambledon Cottage from many viewpoints and this would not be offset by the suggested planting of additional trees and landscaping.

Response

It is noted in the updated Statement of Heritage Impact that the main entry to Hambledon Cottage was originally from the east side. The current entry on the north side was provided in the 1850s, showing that the primary elevation of the cottage was on the east side, with a large verandah towards Elizabeth Farm, with its rear secondary buildings located towards the nearby property boundary with Experiment Farm. The original Hambledon Cottage blue sky background was towards the Parramatta CBD, which has been largely impacted by high-rise buildings, and will be further impacted by more high-rise buildings that have been recently approved and are under construction. Accordingly, while the new buildings will have a visual presence to the south of Hambledon Cottage, they are located as the side view of the historic cottage.

The updated proposal provides an uninterrupted view corridor behind Hambledon Cottage, enhancing its backdrop views which are currently obscured by the existing factory on the subject site, OLOLC and buildings along the escarpment.

The proposed landscape will introduce an unobstructed landscape view corridor from Hambledon Cottage to OLOLC as the publicly accessible Green Spine, linking the landscaped Shared Zone to the channel walk, and providing a visual connection to Hambledon Cottage when viewed from Hassall Street.

The existing blue sky background includes the upper canopies of large trees in Hambledon Cottage grounds and elevations of the redundant factory and OLOLC.

The new VIA prepared by Tzannes, detailing the amended development shows that the buildings will not dominate the background of Hambledon Cottage from many viewpoints.

Issue: Impact on heritage setting

This proposal would seriously impact the setting of three of the most important historic places in Australia - Elizabeth Farm, Experiment Farm and Hambledon Cottage. This proposal uniformly increases the height across the former factory site and extends the built footprint further west.

Response

The updated proposal includes the removal of the redundant factory after 75 years to release new opportunities for the setting and public connectivity, views along the original side boundary of Hambledon Cottage, upgrade Clay Cliff Creek stormwater channel escarpment and improved direct access between Elizabeth Farm and Experiment Farm.

The updated proposal has been thoughtfully designed in terms of built form, scale, height, and setback to ensure the proposed new buildings will not detract from its historical context. The updated proposed development includes the integration of landscape elements that reflect the heritage context, contributing to and enhancing the rich history of the Harris Park precinct.

By incorporating First Nations values and engagement, the updated proposed development will add a new layer of context to the heritage listed items in the locality, enhancing the existing cultural significance of the precinct by integrating pre-colonial and contemporary multi-cultural design elements, which is currently missing.

The proposed variety of through site public access will improve pedestrian movement around the local context and will enhance the public access between the three historic cottages.

The main entry to Hambledon Cottage was originally from the east side. The current entry on the north side was provided in the 1850s, showing that the primary elevation of the cottage was on the east side, with a large verandah towards Elizabeth Farm, with its rear secondary buildings located towards the nearby property boundary with Experiment Farm. Being constructed in 1822, while Harris's Experiment Farm Cottage was constructed in 1835, there was no historic visual and social connection between Hambledon Cottage and Experiment Farm Cottage just as there was none between Macarthur and Harris. There are already many mature trees that block the Hambledon Cottage and Experiment Farm Cottage current visual relationship and these will be retained. The proposal is on land between Hambledon Cottage and Clay Cliff Creek stormwater channel escarpment, occupied from 1875 by Neals cottage. While the updated new buildings will have a visual presence to the south of Hambledon Cottage, they are located as the side view of the historic cottage, and thus will have no adverse impact on its original backdrop, which has been already affected by the high-rise buildings of the Parramatta CBD.

The updated proposed development includes three sub-precincts which have been created to reflect their distinct identities shaped by their settings. The proposed built forms have been carefully developed from co-design process, integrating built form and landscape. The proposed built forms in each sub-precinct will reflect their distinct identity and setting.

The updated proposal includes the integration of the built form and landscape to create an appropriate landscape setting which will contribute to and enhance the landscape setting of heritage items in the vicinity.

The larger 'Heritage Context' now includes the evolved character of the Harris Park Precinct, of which from a heritage standpoint, this updated proposal is compatible.

Through this updated proposal appropriate setbacks are carefully considered and provided to all boundaries.

The updated proposal provides an increased setback to the north boundary adjoining Hambledon Cottage, and to the west boundary adjoining Experiment Farm and its reserve, and to the east boundary adjoining Gregory Place. No changes to the south boundary setback are proposed. However, the built forms have been modified to enhance the connection of the channel walk within a network of open spaces.

Issue: Safety of visitors

It is essential for the safety of visitors, including school children (2,500 in 2019) who have activities in the park around Hambledon Cottage and for the security of Hambledon Cottage buildings and gardens that the fence between the proposed development and the cottage be maintained. The fence will need to extend down to Gregory Place to prevent using Hambledon Cottage or its reserve as a short-cut to the new development.

Response

The design aims to have a continuous, accessible ground plane by blurring the site boundaries. Connections are established to Clay Cliff Creek stormwater channel, Hambledon Cottage, and extending further to the Parramatta River. This approach seamlessly integrates the site within the parkland setting, enhances access to surrounding public parks, and improves visibility as well as appreciation of Hambledon Cottage within the public domain.

Special considerations have been made to address concerns from the Parramatta & District Historical Society. It is acknowledged that the fences around the Cottage will remain. The boundary between the project site and the park near Gregory Place will feature low planting for physical separation, while providing pathways at frequent intervals to allow controlled access between the properties.

The final design of this boundary condition is open to discussion and input from the approving authority at the detailed design stage.

Issue: Traffic lights

With 1,000 residents, the volume of traffic using the only vehicular access (Gregory Place) will be considerably in excess of present volumes - there is a need for traffic lights at the corner of Gregory Place and Hassall Street to prevent possible accidents.

Response

The reduction in development scale from 483 dwellings to 320 dwellings, representing more than 33 percent fewer dwellings delivered, lessens the overall impacts of the development. The modelling results show that the proposed development is not expected to create significant impacts on the operation of the key intersections surrounding the site, either when assessed with or without nearby developments. All intersections will operate at a similar LoS to the existing conditions during both peak hours. No upgrade to infrastructure is required as a result of the proposed development. Refer section 5.1.5 of the Traffic and Accessibility Impact Assessment prepared by SCT Consulting for additional detail relating to this query.

It is identified that the submission refers to present volumes. It is noted that the subject site is an approved, substantial industrial manufacturing facility which hasn't been operating for the past 25 years. Operation in accordance with its approval would result in a substantial volume of vehicles, including commercial vehicles, travelling through the Gregory Place/Hassall Street intersection. The proposed residential use removes the vast majority of the commercial vehicle movements.

Issue: Alternative vehicular access

There appears to be no alternative possibilities as to an alternative vehicular access to the development other than through Gregory Place even though the EIS suggests that such alternatives need to be explored.

Response

The subject site only contains a frontage to Gregory Place.

Issue: Hambledon Cottage coaches

Coaches bring and pick up Hambledon Cottage visitors, both adult groups and school children, and most park in Gregory Place - there is a need to provide a separate coach parking space on the western side of the street for this purpose - parking will probably be of a premium with many residents in the new development opting to park in Gregory Place.

Response

Considering that the residential dwellings will be delivered in the forms of affordable and BTR housing and that the development is located within walking distance of many public transport stops and stations, parking provisions are considered appropriate, will be able to accommodate all parking demand, and will not adversely impact the supply of on-street parking in the area. It is noted that the proposal seeks to provide greater parking than that suggested by both the department and council.

Issue: Demolition of existing buildings

There are serious concerns about the disturbance during the demolition of existing buildings and construction of the new buildings, due to the indicated presence of asbestos. It should be remembered that James Hardie gave away free landfill at the time of the current development there - this landfill was found to contain asbestos - a close example is the current need to contain and/or remove asbestos in the neighbouring James Ruse Reserve.

Response

It is understood the existing site buildings and structures contain hazardous materials that could include non-friable and friable forms of asbestos containing building products. It is a requirement under the Work Health and Safety Act 2011 (NSW) and the Work Health and Safety Regulation 2017 (NSW) that hazardous building materials including asbestos must be removed and managed appropriately before any demolition of buildings or structures occurs. Contamination of ground surfaces and soil caused by inappropriate demolition practices would not occur under existing controls and legislation of managing hazardous asbestos building materials.

Demolition will be conducted in accordance with appropriate legislation and standards to prevent exposure to local residents. These activities are not uncommon in Sydney where asbestos contamination is required to be remediated from building structures and from surface soils.

Issue: Hambledon Cottage visitors

In this regard, due to the dust and pollution, there is mention that people may have to be moved away from near the site during such demolition & construction works and provided alternative accommodation - this does not cater for Hambledon Cottage and its operations as, whilst nobody actually lives on the site, it would mean that activities and visitors to Hambledon Cottage would have to stop which would cause a financial loss to its operation, thus appropriate compensation should be provided.

Response

During demolition, excavation and construction activities, appropriate noise and dust mitigation strategies will be employed under the required legislation and regulations of NSW. These protective strategies are fairly common on all construction projects within Sydney and NSW. It is not expected that construction activities on the site will adversely impact museum operations because of strict protocols that must be followed during the proposed works.

7.6.3 The Maronite Catholic Eparchy of Australia, New Zealand and Oceania – 29 August 2022

Issue: Height and bulk

The development site has a maximum height of building control of 9.2m under the Parramatta LEP 2011.

The development proposes a variation to this height limit with a proposed building height of up to 27.9m (67% variation). We acknowledge a Clause 4.6 Statement has been provided by Pacific Planning to support this variation however this does not adequately justify this large exceedance in height.

The proponent uses the reasoning that greater heights should be sought for the site given its location in close proximity to the Parramatta CBD which affords greater densities for residential and commercial uses.

However, in comparison, the site and surrounding Harris Park area is highly constrained by heritage values, environmental factors like flooding and low-density residential development. Therefore, the height proposed is considered excessive for the site noting the immediate surrounding context of the site.

To the west heights are limited to 6m, to the east heights are limited to 11m-14m and further south heights are limited to 13m. With the surrounding development only having heights of up to 14m, the proposal is considered out of context and unsympathetic to surrounding buildings.

The design of the buildings aims to minimise the bulk located at the north of the development site at the interface with the Hambledon Cottages (State heritage item at 47 Hassall Street, Harris Park) to

be sympathetic to heritage values. However, this has meant additional massing located at the south of the site which directly impacts the submission site.

Response

The proposed variation to the 9.2-metre height of buildings development standard under the Parramatta LEP 2011 is acknowledged, with a proposed built form envelope that reaches a maximum of 29.0 metres. This represents an exceedance of approximately 215 per cent. While this variation is numerically significant, the planning framework governing this site—namely the Housing SEPP and the certified SCC—requires the assessment of *performance-based compatibility*, not strict numeric conformity.

1. The height standard is outdated and misaligned with the site's future role

The height control of 9.2 metres originates from the site's former IN1 General Industrial zoning, and was intended to regulate the scale of industrial buildings rather than residential development. Ironically, the existing industrial structure currently on site exceeds this height control, standing at approximately 24–25 metres at the boundary, and creates unacceptable built form outcomes—particularly in relation to adjacent heritage lands.

As acknowledged by the department in issuing the SCC and reiterated by council in its own planning strategy documents, the current planning controls are *residual*, do not reflect the site's evolving role within the urban structure of Parramatta, and are not fit for purpose in managing the delivery of well-designed affordable housing.

2. The Clause 4.6 request is robust and demonstrates compliance with statutory tests

The written request under clause 4.6 of the LEP:

- Demonstrates that the objectives of the height standard are met notwithstanding non-compliance, including protection of heritage, solar access, and appropriate urban transitions.
- Establishes clear and compelling environmental planning grounds for the variation, including public benefit in the form of affordable housing, ecological landscape integration, heritage curtilage restoration, and removal of industrial blight.
- Confirms that the variation is in the public interest, as it delivers on the Housing SEPP policy intent and the strategic direction endorsed by the Parramatta LSPS and GPOP Place Strategy.

3. Heritage and bulk placement have been carefully resolved

Contrary to the assertion that the southern massing is unreasonably impactful, the built form strategy:

- Withdraws bulk from the northern interface with Hambledon Cottage and the Experiment Farm Reserve, replacing industrial intrusion with landscaped setbacks and a 30-metre axial view corridor.
- Consolidates height centrally and in the southern portion of the site where no heritage interface occurs.
- Maintains separation distances, solar access, and overshadowing controls as required under the Apartment Design Guide and Chapter 4 of the Housing SEPP.

The decision to allocate some height at the southern portion of the site is not arbitrary—it is the result of detailed design testing, compatibility assessment, and iterative refinement as required by the SCC. The height is used not to maximise yield indiscriminately, but to enable spatial efficiency, landscaped permeability, and context-sensitive transitions.

4. The SCC provides a statutory basis for compatibility

The issued SCC under division 5 of the Housing SEPP confirms that the proposed use, scale and form are *compatible with the surrounding land uses*, provided the proposal is refined through a process of expert engagement and design iteration. These processes have been carried out over several years, and the current design reflects the cumulative result of that assessment and refinement process.

The SCC conditions required the proponent to:

- Address heritage interface through built form and landscape response.

- Demonstrate environmental performance and contextual integration.
- Engage with community and relevant agencies to inform design testing.

These conditions have been met in full, and the outcome is a built form that delivers superior outcomes when compared with both a compliant (compressed) residential scheme or a permissible industrial use.

Conclusion

The proposed height does not result in undue or excessive bulk. It enables a compatible, high-performance, affordable housing project that respects heritage values, transitions sensitively to neighbouring areas, and removes a more harmful existing built form. The concerns raised in the submission are respectfully acknowledged, but the strategic, environmental, and legal planning frameworks all support the conclusion that the proposed height is appropriate, justified, and consistent with the Housing SEPP's compatibility framework.

Issue: Childcare centre

The proposed bulk and scale will have negative privacy impacts onto OLLC and the childcare (located on lower level in the cathedral) which is located at the southern boundary of the development site.

Considering the cathedral is approximately 3-4 storeys high, the proposed 4-8 storey development is anticipated to compromise the privacy of parishioners and visitors of OLLC.

As noted previously, most of the bulk of the proposed development is located on the south which directly impacts OLLC the most.

Additionally, roof top gardens are not considered appropriate for the development noting privacy issues of residents onlooking onto the submission site.

Response

The updated scheme has been developed taking careful consideration of the impacts on neighbours. Prior to updating the design, several studies were undertaken on how the site affects neighbouring properties. Refer to the design report section 5.2 - 5.4; design strategies and built form strategies which consider solar amenity and public domain strategies. Objectives included:

Provide Young Academics Early Learning Centre a minimum of 2 hours of solar access between 8am and 4pm during winter months, for not less than 30% (or 2.1m²) of the 7m² of outdoor space per child required, per the DPIE Child care planning guideline.

Built form to step down adjacent to OLLC, considering light and privacy for OLLC and Young Academics Early Learning Centre - Harris Park

Sections 7.4.2 shadow diagrams and 7.4.3 view from the sun diagrams of the design report demonstrate the results of this consideration where overshadowing impacts have been kept to a minimum.

Issue: Noise

The proposal proposes 483 units over the three buildings resulting in approximately 2,781 residents. This large increase in residents will have a large negative noise impact to the OLLC and surrounding low density development. This includes plant and equipment items like ventilation plants, fans and air-conditioners.

There is also anticipated noise associated with construction especially with bulk excavation works which will directly impact the southern boundary of the development at the submission site. A

comprehensive Construction Noise Management Plan will be required to mitigate the noise impacts to the submission site and especially the OLLC.

Access to development is proposed at Gregory Place. As this is the only proposed access point to the development, being close to the submission site, there will be negative noise impacts disadvantaging OLL.

Noting OLLC occasionally hold events and services utilising outdoor areas, the anticipated noise from the proposal will significantly disrupt this.

Response

Refer to appendix K the updated acoustic assessment prepared by Renzo Tonin. Noise emitted from the site will be required to comply with the EPA Noise Policy for Industry (or other acoustic requirement imposed by the consent authority). This will provide adequate protection to nearby land users. The primary noise generation by the site is from building services. Subsequent stages of documentation including Construction documentation will provide more details of how these controls will be addressed (as services design is completed). The proposed redevelopment of the site for residential use will result in creation of new conditions of consent that impose stricter noise emission limits compared to the currently approved use of the site.

As with any development, construction noise and vibration must be suitably managed. A Construction Noise and Vibration Management Plan has been prepared as part of the SSDA documents. In addition, typically a condition of consent is imposed requiring a CNVMP be prepared as part of CC documentation, once construction systems are known in more detail. Noise management in order to meet the requirements of the EPA Interim Construction Noise Guideline would be identified in that report in order to ensure there is no excessive noise or vibration impact during the construction stage.

Issue: Overshadowing

Considering the development site is located north of the submission site, OLLC is anticipated to experience significant overshadowing. This includes the play area of the childcare within the cathedral building, right at the boundary to the development.

Also, solar access to the translucent stained-glass windows within the OLLC will be compromised, detracting from the visual attractiveness of the cathedral.

This loss of solar access will have negative impacts to the ability to develop the site in the future which is discussed further below.

The Shadow Diagrams prepared by Stanasic Architects have been sighted and we question their accuracy in demonstrating the shadowing impacts to southern properties including the submission site. By 3pm, we note that most of the submission site will be overshadowed during winter solstice.

Response

It is noted that whilst the subject site is north of the OLOLC site, there is an approximate 4 storey difference between the sites due to the original escarpment. Shadow diagrams and views from the sun of the updated proposal are shown in the updated design report, section 7.4.2 and 7.4.3 respectively.

The updated built form has considered the redevelopment potential of the OLOLC site along its northern boundary and has applied appropriate setbacks to the built form elements greater than 4 storeys in height.

Issue: Views

The development is anticipated to reduce the views of the submission site to State Heritage Register (SHR) listed site at Experiment Farm Reserve (to northwest of OLLC), SHR heritage item at Hambledon Cottage Reserve (north of OLLC), Robin Thomas Reserve and James Ruse Reserve (northwest of OLLC).

The excessive height and bulk of the development also blocks the visibility of the submission site from these northern open spaces which detracts from the prominence of the cathedral building in the skyline.

Response

It is understood that this comment refers to views out from the OLOLC balcony which functions primarily as a fire egress path., currently functioning primarily as a fire egress has a view towards the treetops

of Hambledon Cottage. The existing industrial roof forms part of this view. There are no views from within OLOLC due to the stained glass windows.

Please refer to the Visual Impact Assessment prepared by Tzannes. Whilst this document includes a particular focus on views to and from Hambledon Cottage, Experiment Farm and Elizabeth Farm, the Tzannes Visual Impact Assessment, as provided at Appendix E, has carefully and wholistically considered the visual impact of the proposal by firstly undertaking a visual survey to qualify the visual catchment of the proposal and surrounding Heritage and Cultural sites. This survey identified that the flat landscape and extensive existing built form and vegetation greatly impact visibility.

This analysis in section 2.5.5 has identified that there are no views out from the OLOLC balcony to Experiment Farm Reserve, Robin Thomas Reserve and James Rise reserve due to the existing built form and vegetation on the subject site. Additionally, the analysis identified that the view north to Hambledon Cottage whilst has the Bunya Tree and Hoop Pine visible, the Cottage itself isn't visible, and the visual midground is the expansive view of the existing industrial buildings roof.

This study extensively prepared a visual survey which identified that due to the flat landscape, the existing single and double storey buildings and vegetation substantially impacted on the visibility of OLOLC from the surrounding area in the current state.

The updated proposal opens up two currently non-existing axial views of OLOLC. The first view, is through the 30m wide corridor connecting Hambledon Cottage to OLOLC, depicted in figure 149 of the updated design report. The second view, is from the CBD along the Channel Walk, depicted in figure 147 of the updated design report.

The removal of the visually intrusive industrial roof is considered a positive outcome for OLOLC.

Issue: Future redevelopment

The proposed overdevelopment of the development site will have highly negative impacts to the future redevelopment of the submission site.

The current buildings on the submission site are considered underdeveloped relative to its R4 high density residential zoning.

The proposed concept development will have adverse visual, privacy, noise and shadowing impacts to the submission site as previously detailed which will compromise the future redevelopment of the site.

Response

It is unclear what the Cathedral has in mind for redevelopment or why the proposed redevelopment of the subject site would have any impact on any future plans the Cathedral might have.

The updated proposal supports, rather than constrains, the future redevelopment on OLOLC land.

Section 5 of the design report provides background to the consideration that has led to the updated design. Several items including setback, overshadowing and view corridors have been carefully considered with an aim to preserving the Cathedral's amenity.

Instead of providing an active industrial use onsite which may cause issues in terms of noise, pollution and traffic, reducing the amenity for OLOLC properties, the updated proposal introduces an extensively landscaped and accessible residential neighbourhood, contributing to local amenity at Gregory Place.

The update design presents a much lowered built form to the north of OLOLC, addressing solar access and overshadowing concerns and allowing ADG separation requirements to be met should OLOLC redevelop on their land, noting that with the current DA OLOLC has in for the southern on grade carpark, the only outstanding element of the land holding left to redevelop is the multi storey carpark to the east of OLOLC, and adjoining the subject sites Southern boundary.

Issue: Heritage

The sites are highly constrained by various heritage listed items and heritage conservation areas including the following.

- Hambledon Cottage (SHR item)
- Elizabeth Farm House (SHR item)
- Experiment Farm Cottage (SHR item)
- Robin Thomas Reserve (Local heritage item)
- Experiment Farm Conservation Area
- Elizabeth Farm Conservation Area

These items and conservation areas surround both sites to the north, west and east and considered culturally significant due to post-war significance.

The design of the development has considered impacts of bulk and scale on the Hambledon Cottage located north of development site and the closest heritage item to the site. However, this comes at the expense of southern properties with the proposed bulk and scale concentrated at the southern boundary of the development site, impacting the OLLC.

The proposed bulk and scale are not considered in consistency with the intended landscape and character of the surrounding heritage items and conservation areas. The development will dominate the landscape and obstruct views from heritage items to the surrounding environment and hinder site through links between heritage areas.

Response

Refer to the updated Statement of Heritage Impact prepared by GBA Heritage Sub-sections 7.1 - 7.6 .The existing cultural significance of the precinct will be enhanced by the integration of pre-colonial and contemporary multi-cultural design elements with the existing spatial context of the significant colonial buildings.

The proposed open space network and landscape design with interpretive elements within the subject site, will contribute to and enhance the interpretation of pre-colonial, colonial, and contemporary multicultural history of the precinct.

Issue: Aboriginal culture

The site is considered a part of a sensitive Aboriginal archaeological area. The development fails to celebrate and acknowledge Aboriginal culture and engagement with the Aboriginal community is considered minimal. The proposal does not take into account the importance of Clay Cliff Creek or try to restore a natural creek that speaks to its I (sic)

Response

The design team has reconsidered the proposition through the co-design process between Tzannes (Urban Design and Architecture) and Yerrabingin (Connecting with Country and Landscape Design). The design takes the approach of tying the site to Country. Set between three colonial sites, while having little significance itself. The team sees this as a unique opportunity to use the site to reference the First Nations design Principals. Refer to section 5.1 of the Design report for detail of how this approach is proposed to be pursued.

Refer to subsections 7.1 to 7.6 of the GBA Heritage updated Statement of Heritage Impact. The proposed open space network and landscape design with interpretive elements within the subject site, will contribute to and enhance the interpretation of pre-colonial, colonial, and contemporary multicultural history of the precinct.

Issue: Surrounding low density

The bulkiness and height of the proposal is far too inconsistent with surrounding lower density dwellings located to the east and southwest of the site which have maximum height controls of 6m-11m currently occupied by one-two storey dwellings, being far less than the 27.9m height proposed.

The apparent inconsistency of the proposed height to the surrounding environment contributes to undesired outcomes for the intended character of this area.

Response

The concern regarding the apparent inconsistency between the proposed building height and surrounding low-rise residential development is acknowledged. However, when properly assessed against the strategic planning context, built form evidence, and applicable compatibility framework under the Housing SEPP, the proposal does not present an incompatible or inappropriate response. Rather, it reflects a carefully resolved, performance-based design outcome that balances site constraints, housing objectives, and heritage sensitivities.

1. Strategic and policy context

The site is not located within a low-density residential zone. It is zoned E4 General Industrial (formerly IN1) and is situated within a transitional urban context identified for renewal. The Parramatta LSPS (2020) and the GPOP Place Strategy clearly articulate that this precinct—located just beyond the Parramatta CBD boundary and adjoining regional open space—should transition to residential and mixed-use functions over time. This site has been specifically identified for this transition, as evidenced by the secretary's approval of a SCC) under the Housing SEPP, which confirms the strategic and physical appropriateness of higher density housing on this land.

2. Compatibility does not mean sameness

Under clause 39 of the Housing SEPP, compatibility is not defined by uniformity in height or built form. Rather, it is measured by whether a proposal can coexist harmoniously with its context, having regard to scale, bulk, land use function, environmental performance, and interface management.

The design presented in this application applies a graduated building height strategy, concentrating bulk centrally within the site and stepping down towards lower-scale residential areas and heritage boundaries. View corridors and separation zones, including a 30-metre-wide axial open space link between Hambledon Cottage and the western interface, provide visual relief and reinforce contextual transition. Additionally, significant landscaped setbacks and deep soil zones have been introduced to protect adjacent dwellings and heritage assets.

Importantly, the existing industrial structures on the site currently rise to approximately 24–25 metres at the boundary, directly abutting low-density and heritage areas. In contrast, the proposed development removes this incompatible built form and introduces a more refined, permeable, and spatially distributed built form with substantial open space and public domain improvements. This constitutes a net compatibility gain.

3. Height must be assessed relative to environmental performance

Unlike a height blanket applied uniformly to all sites, the proposed height has been modelled using solar planes, overshadowing studies, and visual impact analysis to ensure that external amenity impacts are controlled and acceptable. This approach is consistent with contemporary performance-based planning practice, particularly in contexts where industrial controls no longer align with strategic policy directions. As demonstrated in the submitted Visual Impact Assessment and clause 4.6 variation request, the proposal:

- Avoids adverse overshadowing of any adjacent dwellings.
- Maintains high levels of solar access to both proposed and existing residences.
- Enhances the public realm and landscape setting through generous setbacks and canopy planting.
- Protects and frames key heritage views and sightlines.

4. Public interest and strategic benefit

This proposal will deliver 50 per cent affordable housing in a build-to-rent model—an outcome that is not only consistent with the Housing SEPP but is actively sought under the NSW Government’s housing delivery priorities. The design has been iteratively refined over several years of engagement and responds positively to the SCC conditions requiring a compatibility-led design approach.

While the proposed maximum height of 29 metres exceeds nearby residential controls (6–11 metres), this exceedance is **not excessive or unjustified** when assessed against:

- The removal of existing bulky industrial forms.
- The landscaped interface strategy.
- The site’s strategic location.
- The use of height to unlock significant public and social benefit.

Conclusion

The proposed development does not produce adverse or incompatible outcomes in relation to nearby lower-scale dwellings. It transitions sensitively from the central form toward sensitive boundaries, improves on the current condition, and has been designed to respect and enhance the surrounding context rather than mimic it. The application of the clause 4.6 variation is therefore appropriate and supports a built form that reflects contemporary strategic planning, urban design best practice, and environmental responsibility.

Issue: Parking and Traffic

The development is anticipated to have negative parking and traffic implications to the surrounding sites.

It is anticipated that with a large increase in residents as a result of this development, there will be parking onflow issues onto surrounding streets including Alice Street (fronting submission site) which disadvantage the existing residents, parishioners/ visitors of OLLC and visitors to significant heritage items nearby.

There is also an anticipated great increase in traffic as the proposal relies on use of sub-arterial/ arterial roads and not local roads. Therefore, for existing residents that are currently affected by additional traffic on existing sub-arterial/arterial roads, they will be further disadvantaged.

Response

The updated proposal will not have a negative impact on parking or traffic. Refer to the SCT Transport and Accessibility Impact Assessment. This report has considered the overlap of the proposal's peaks with that of OLOLC and the Maronite College of the Holy Family, and noted that the impacts of the proposed development would be lower than if the site continues to operate under the current approval, or it was redeveloped for a new industrial proposal.

Issue: Flooding

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

Sufficient information is required to confirm the development of the site will not increase flooding of adjacent properties in the design event and result in negative impacts to surrounding sites.

Response

Please refer to the GRC Hydro Revised Flood Assessment. The development will result in a minor increase in flood levels however these are predominantly contained within the site with only a small area in the western gutter of Gregory Place (immediately on the border of the site) experiencing minor adverse impact in a 1% AEP event inclusive of climate change.

This affected area is at the end of a cul-de-sac so through-traffic is not adversely impacted.

Issue: Contamination

A Contamination Phase 1 report (26 August 2015) from Sullivan Environmental Sciences concluded that historic activities at the site may have caused potential site contamination and may pose a potential health risk.

The subsequent Contamination Phase 2 report and Remedial Action Plan (RAP) (2022) are based on findings of Phase 1 (2015). While they conclude the land is suitable for development subject to recommendations, the lack of investigations undertaken for the Phase 2/ RAP reports may mean any recent contamination present on site after the Phase 1 report is now is unaccounted for. Even if no further contamination has occurred in the last 7 years, this has not been confirmed with a recent site investigation.

Response

As noted above, Sullivan Environmental Sciences prepared Phase 1 (PSI) and Phase 2 (DSI) contamination investigations. Sullivan also prepared a Remedial Action Plan (RAP) in accordance with the suite of guidelines made or approved by NSW EPA. These documents were provided with the Development Application.

The site remains unchanged since the date of the reports. The site remains used as office space and for the parking of cars on sealed hardstand surfaces. These activities are considered relatively benign to cause site contamination. As such, the conclusions and recommendations of the reports remain valid because the site has not been used for any additional activity in recent times since the date of the reports that would cause any additional contamination issues.

The initial application acknowledges that due to the existing structures on site, there are limitations in these investigations and that further investigation will be required once demolition occurs.

Issue: Notification and stakeholder engagement

The lack of transparency and on-going consultation between the proponent and surrounding landowners has resulted in a proposed concept form that is unsupported and inconsistent with the surrounds.

The Stakeholder Management Report prepared by Forward Thinking commented that there was 'general support for the proponent's concept plans' by the OLLC which is not correct. The lack of

transparency with OLLC before the lodgement of this application has resulted in an objection to this proposal from OLLC as the form proposed is considered incompatible with the surrounds.

This lack of consultation prior to lodgement has implications to the Maronite community. There was no appropriate time awarded to review the development, provide feedback and notify parishioners before formal submission of the SSD to avoid objection during exhibition.

Response

Consultation prior to EIS submission saw a letterbox drop to 1,511 local residents and businesses, which provided feedback options. Only 7 people completed the community survey, indicating a lack of interest. Direct engagement was had with OLOLC and the Maronite College of the Holy Family prior to the EIS lodgement.

It's noted that of the submissions made during the formal exhibition period, a change.org petition was commenced amongst the OLOLC community.

The proponent engaged with OLOLC in August 2024, offering to present to the wider committee or OLOLC's experts. Despite the proponent making multiple attempts to follow up on this offer, it was never taken up.

The proponent again undertook a letterbox drop to 1437 local residents and businesses, established a project website and held community online information sessions. OLOLC was directly notified in advance of the website going live and the community online information sessions. A total of 8 people attended the sessions, none of which identified themselves as being from the OLOLC community.

Issue: Site compatibility certificate

The development site is zoned as IN1 General Industrial (under Parramatta LEP 2011), it is acknowledged that this SSD relies on a Site Compatibility Certificate (SCC) issued 19 July 2017 for 2A Gregory Place, Harris Park under the previous Affordable Rental Housing SEPP to permit the development of affordable housing on site.

The Department of Planning and Environment (the Department) expressed at the time concerns regarding the bulk and scale proposed and required "any future development be in-keeping and compatible with existing and approved uses within the area surrounding the site". Parramatta City Council also expressed concern for the excessive form proposed noting surrounding land uses, heritage and flooding.

It is noted that the final development outcome still does not adequately address surrounding land uses and environmental constraints as required by the SCC.

Also, it is noted that the SCC is valid for 5 years as per clause 37(9) of the previous Affordable Rental Housing SEPP. Therefore, the validity of the SCC to support the permissibility of the proposed use on the land is questioned as the SCC has expired (2017 to 2022).

The use of the land for industrial is not seen as appropriate and OLLC supports the residential use of the site. But the reliance on the SCC to achieve this proposal is not considered optimal, as the SCC is seen as a means to permit residential development on the site not a means to amend planning controls like height.

A rezoning of the development site which proposes greater densities and heights for the site as sought by the proponent is seen as a more appropriate planning pathway to achieve a suitable and optimal development of the site.

Response

The concerns raised regarding the validity of the SCC, its statutory weight, and its relationship to the proposed height variation under clause 4.6 are noted. These matters have been carefully considered by the proponent and addressed through legal interpretation, policy alignment, and extensive expert input.

1. Status and continuing legal effect of the SCC

The SCC for 2A Gregory Place was issued under clause 37 of the now repealed State Environmental Planning Policy (Affordable Rental Housing) 2009 on 19 July 2017. While that policy has since been consolidated into the Housing SEPP 2021, clause 3(3) of Schedule 7A of the Housing SEPP provides a

transitional saving that deems the 2017 SCC to be a certificate issued under division 5 of Chapter 2 of the Housing SEPP. Furthermore, clause 39(10) of the Housing SEPP 2021 states that a certificate issued before the lodgement of a development application continues to have legal effect until the application is finally determined.

Accordingly, despite the passage of time since the original issue date, the SCC remains valid and effective for the purposes of determining this SSD application. This position is supported by legal advice appended to the DA and is consistent with the statutory interpretation applied by the Department of Planning and Environment in similar circumstance.

2. Purpose and effect of the SCC

The SCC is not an approval in itself, nor does it override LEP development standards. Rather, it functions as a gateway mechanism that confirms the site’s strategic compatibility for the nominated use—in this case, affordable housing. The SCC issued for 2A Gregory Place determined that the proposed use was appropriate, subject to a future DA demonstrating compatibility with surrounding development, environmental constraints, and relevant SEPP criteria.

It is incorrect to suggest that the SCC is being used to “amend planning controls like height”. The clause 4.6 variation request has been independently prepared in accordance with the EP&A Act and the Parramatta LEP 2011, which remains the applicable instrument under clause 1.8A of the 2023 LEP. The request seeks consent for a variation to the 9.2-metre mapped height control, on the basis that strict compliance would thwart the underlying intent of clause 4.3 and produce inferior heritage, amenity, and design outcomes.

3. Addressing compatibility and design evolution in response to SCC conditions

The SCC included conditions requiring the proponent to engage in detailed consultation with council, community stakeholders, and relevant agencies to refine the development and ensure environmental and urban compatibility. This process has been undertaken in good faith over several years and is evidenced by the iterative refinement of the design, built form, heritage response, and landscaping strategy.

Key refinements include:

- **Removal of the existing 24–25 metre high industrial structure** that previously dominated the site and compromised the heritage setting of Hambledon Cottage and Experiment Farm.
- **Introduction of building separation and setbacks** that significantly exceed minimum standards, providing curtilage and view corridors to heritage sites.
- **A mid-rise typology** that concentrates height centrally and away from heritage boundaries, thereby enabling solar access, deep soil landscaping, and view preservation.
- **Enhanced public domain connections**, including a new pedestrian link aligned with the SCC condition to improve permeability and integration.

These refinements reflect the intent of the SCC as a compatibility-testing mechanism. They also align with clause 39 of the Housing SEPP, which requires built form compatibility in terms of scale, bulk, character, and environmental performance. The detailed evidence provided in the DA—including expert heritage, visual, social, and economic assessments—demonstrates that the final scheme now responds positively to the SCC’s expectations and delivers superior outcomes compared to a height-compliant or industrial fallback scheme.

4. Strategic planning alignment and zoning pathway

While rezoning is one mechanism to transition a site from industrial to residential use, it is not the only nor necessarily the most appropriate planning pathway in this instance. The Housing SEPP division 5 pathway exists precisely to enable the redevelopment of underutilised or inappropriate sites—such as aging industrial land within strategic renewal corridors—where the public interest is served by delivering affordable housing in compatible built form.

The subject proposal delivers 50 per cent affordable housing, is adjacent to infrastructure and open space, and aligns with the GSC’s GPOP strategy, the council LSPS, and the department’s own housing supply targets. A rezoning process would delay delivery of urgently needed housing without improving

the ultimate planning outcome.

In summary, the SCC remains valid and legally effective, the clause 4.6 variation is properly made and well justified, and the scheme reflects detailed, iterative compatibility testing in accordance with the SCC conditions and the policy objectives of the Housing SEPP and Parramatta LEP 2011. The project provides a public benefit, resolves longstanding interface issues, and has evolved meaningfully to meet its urban and environmental responsibilities.

8 Response to public submissions

In total 111 submissions have been received, including from public agencies, local organisations and members of the public. These range in quantity and detail, from analytical feedback to single sentence responses. To assist in addressing the range and type, the public submissions were grouped into 54 themes.

A detailed register of each respondent and the themes addressed by their submission has been provided in Appendix B.

8.1.1 Theme 1: The proposed buildings are too high

A number of submissions raised concern that the proposed built form is excessive in height and incompatible with the surrounding context, particularly in relation to Hambledon Cottage, Our Lady of Lebanon Co-Cathedral (OLOLC), and nearby low-scale residential areas. These concerns are noted and addressed below.

The proposal has undergone significant refinement since the initial exhibition of the Environmental Impact Statement (EIS). The updated scheme adopts a graduated built form strategy that steps down to two storeys at key interfaces and avoids any built mass directly behind Hambledon Cottage. This approach is deliberate and enhances the prominence of this state heritage item by reinstating a visual curtilage and reinforcing the open setting around the cottage.

A consistent two-storey datum is now employed throughout the site in areas adjoining Hambledon Cottage, aligning with the roof height of the heritage item to ensure architectural harmony. Where the height increases to four, six and eight storeys, this occurs centrally and away from heritage-sensitive edges, maintaining a human scale through articulation, modulation and generous upper-level setbacks. Deep recesses, projections and variation in materiality are employed to visually reduce the perceived height and length of buildings, as confirmed in the VIA prepared by Tzannes and submitted as Appendix E to the response to submissions report¹⁰⁶.

The built form also steps down adjacent to OLOLC and the Young Academics Early Learning Centre – Harris Park, to mitigate any potential overshadowing, overlooking or visual intrusion. These refinements reflect a considered urban design response to solar access, privacy, and setting, and are based on detailed expert input and iterative design development.

Importantly, the Heritage Council of NSW's Approvals Committee reviewed and supported the original eight-storey scheme in March 2021, noting its acceptability in terms of height, heritage interface and curtilage impacts. The Committee's endorsement allowed the scheme to proceed to a Stage 1 concept development application¹⁴⁷.

The revised proposal further reduces visual bulk and improves sightlines to heritage items, as evidenced by the photomontage analysis contained in the VIA. The assessment concludes:

¹⁴⁷ Heritage Council of NSW, Approvals Committee Minutes, March 2021

“The proposed built form, while introducing new height, does so with sensitivity to the heritage landscape. Views from critical vantage points such as Hassall Street, Purchase Street and within Experiment Farm are managed through foreground vegetation, setbacks and articulation, such that no significant visual dominance occurs.”¹⁴⁸

Academic literature on heritage integration supports the principle that compatibility does not require uniformity of scale or replication of historical built form. As noted by Johnston:

“The integrity of a heritage place lies not only in its age or fabric but in the way new development interacts with it—through scale, materiality and curtilage, rather than replication or artificial constraints.”¹⁴⁹

It is relevant to acknowledge in this context that the adjacent seniors housing development, located on church-owned land immediately south-east of the subject site, also exceeds the maximum height control but did so with limited articulation, reduced setbacks and little engagement with surrounding visual or heritage context. The Gregory Place proposal, by contrast, has evolved through multiple design iterations and public exhibition stages to arrive at a scheme that embeds setback transitions, curtilage buffers, and landscaped view corridors. As detailed in the Clause 4.6 Height Variation report (Appendix C), this proposal avoids abrupt transitions and provides a more contextually responsive and balanced design outcome, particularly when viewed in the immediate setting of Hambledon Cottage and the broader Experiment Farm heritage precinct¹⁵⁰.

In conclusion, the height and scale of the proposed development are not excessive, but are instead strategically distributed across the site in accordance with heritage interface principles, contemporary urban design guidance, and environmental performance objectives. The proposal demonstrates consistency with the objectives of clause 39 of the Housing SEPP, section 1.3 of the EP&A Act, and reflects both best-practice design and the support of the Heritage Council of NSW.

8.1.2 Theme 2: The proposed buildings are too bulky and of an inappropriate scale

A number of submissions objected to the scale and bulk of the proposed buildings, expressing concern that the built form would be overly dominant and inconsistent with the character of Harris Park and the surrounding heritage context. These matters have been considered in detail and are addressed below.

The refined concept scheme represents a comprehensive design response grounded in first principles urban analysis. As outlined in the updated design report, Section 1.4 *Key Design Updates*, the proposal has evolved significantly since the original EIS to address concerns related to height, bulk, overshadowing, privacy, and character.

The building envelopes have been substantially reduced, with more than 1,000 m² of gross floor area removed from the footprints—particularly at Building C—to enable a greater extent of publicly accessible open space. This reduction enhances visual permeability and contributes to a parkland setting that physically and visually links Experiment Farm and Hambledon Cottage¹⁵¹.

To improve contextual fit, building heights have been redistributed across the site. A variety of built form scales now respond to specific edge conditions, with sensitive transitions to the childcare centre,

¹⁴⁸ Appendix E - Tzannes, *Visual Impact Assessment*, p. 42

¹⁴⁹ Johnston, C. (1992). *What is social value?* Australian Heritage Commission Technical Publications, Canberra

¹⁵⁰ Appendix C - Pacific Planning, *Clause 4.6 Variation Justification: Height – Gregory Place*, Appendix C, 31 July 2025, esp. pp. 11–13.

¹⁵¹ Appendix A - Tzannes, *Design Report: Gregory Place*, Section 1.4 *Key Design Updates*, 28 July 2025

Hambledon Cottage, and adjoining residences. These adjustments are outlined in the design report, Section 5.4 *Built Form Strategies* ¹⁵².

A new 30-metre-wide green corridor has been introduced at the site's northern boundary to reinforce solar access, visual openness and walkability. Building heights adjacent to the childcare facility have been lowered to achieve compliance with solar access standards applicable to childcare premises, as demonstrated in design report Section 7.4.2 *Shadow Diagrams* and supported by solar testing in Section 5.2 *Public Domain Strategies* ¹⁵³.

Further, the proposal incorporates green roofs, landscaped buffers and upper-level setbacks, which break down perceived scale and reinforce privacy outcomes for both institutional and residential neighbours. Building separations comply with SEPP design standards and are supplemented by vegetated margins that promote a human-scale environment ¹⁵⁴.

Crucially, the design reflects the heritage values of Harris Park. Greater building setbacks have been introduced to respect the curtilage of Hambledon Cottage and Experiment Farm. Integrated landscape strategies—including the Green Spine and view corridors—enhance the cultural legibility of the site and are aligned with the approach advocated by GBA Heritage in the updated Statement of Heritage Impact ¹⁵⁵.

As further outlined in the design report, Section 2.4 *Evolving Context*, the Gregory Place precinct is undergoing urban transformation within a landscape of cultural heritage, civic functions, and higher-density residential development. The proposal's scale is calibrated to support this emerging character while ensuring compatibility with nearby heritage items and public realm settings ¹⁵⁶.

The VIA prepared by Tzannes concludes that the reduced scale and massing now provide improved sightlines across and through the site. The report finds that the development maintains key visual connections and contributes positively to the urban silhouette of the area ¹⁵⁷.

Finally, the amended scheme incorporates a human-scaled architectural language, with two- to eight-storey buildings distributed to respond to context and maintain visual variety. The design achieves a varied and appropriately scaled form, integrating with both the surrounding urban fabric and the SHR-listed heritage sites within the precinct¹⁵⁸.

In summary, the proposed bulk and scale are the result of deliberate, evidence-based urban design responses. The development reflects best practice built form principles and achieves compatibility with heritage settings, the residential character of Harris Park, and the desired future character identified in overarching strategic policy framework.

8.1.3 Theme 3: There is insufficient setback from all boundaries, increasing the heritage impact to Hambledon Cottage and its setting, Experiment Farm and its setting, and to Clay Cliff Creek Channel

Submissions expressed concern that the proposed development fails to provide adequate setbacks from the site's boundaries, resulting in adverse impacts on the setting of Hambledon Cottage, Experiment Farm, and the Clay Cliff Creek channel. The most recent iteration of the scheme has directly responded

¹⁵² Ibid., Section 5.4 *Built Form Strategies*

¹⁵³ Ibid., Sections 5.2 *Public Domain Strategies* and 7.4.2 *Shadow Diagrams*.

¹⁵⁴ Ibid., Sections 4.7 *Safety and Privacy* and 5.4 *Built Form Strategies*.

¹⁵⁵ Appendix P - GBA Heritage, *updated Statement of Heritage Impact: Gregory Place*, July 2025, pp. 11–13

¹⁵⁶ Appendix A - Tzannes, *Design Report*, Section 2.4 *Evolving Context*.

¹⁵⁷ Appendix E - Tzannes, *Visual Impact Assessment: Gregory Place*, Appendix E, 28 July 2025, p. 41

¹⁵⁸ Ibid., and Design Report, Section 5.0 *Design Framework*.

to these concerns, with revised built form placement, increased setbacks, solar access modelling, and updated heritage analysis.

Setbacks to the northern, western and eastern boundaries have been increased following a reappraisal of the site's visual and spatial relationships with nearby heritage items and open space corridors. As detailed in the updated design report, Section 5.4 *Built Form Strategies*, these changes were made to improve spatial transitions and mitigate perceived bulk in views from key surrounding interfaces, particularly Hambledon Cottage to the north and Experiment Farm to the west ¹⁵⁹.

The northern setback has been significantly widened to improve the visual separation between the built form and Hambledon Cottage. This creates a more legible and respectful heritage curtilage. The western boundary—adjoining the Experiment Farm reserve—now benefits from additional landscaped separation and reduced building heights at the interface. These changes reinforce the parkland setting of the reserve and protect view corridors from Hassall Street and the Experiment Farm ridge ¹⁶⁰.

Importantly, the eastern setback, which faces Gregory Place and the OLOLC site, has been increased to incorporate a 30-metre-wide Green Spine that links the heritage items via open space. The design introduces deeper building separations, and the VIA confirms that the revised east–west alignment avoids direct visual stacking behind Hambledon Cottage and provides enhanced light, sky view and vegetation integration ¹⁶¹.

Regarding the Clay Cliff Creek stormwater channel, the amended scheme presents a considered approach to spatial experience and solar performance. As noted in Section 7.4.2 of the design report, the width of the channel walk varies from approximately 6 metres to expansive and broader landscape openings that coincide with key wayfinding nodes and landmarks. Solar analysis demonstrates that this design maintains sunlight access to the channel walk during the most important times of day—particularly in the morning to early afternoon—ensuring passive amenity, visual openness and ecological benefit ¹⁶².

The Statement of Heritage Impact by GBA confirms that the setbacks now proposed are appropriate and have been deliberately calibrated to reduce built form presence at critical visual edges. The SHI concludes:

“The increase in setbacks, along with landscaped buffers and a recalibrated site strategy, has improved the development’s ability to respect and frame the heritage setting of Hambledon Cottage and Experiment Farm. The proposal enhances the curtilage legibility of these SHR-listed items and reduces intrusion on their key view corridors.” ¹⁶³

Further, as discussed in the VIA and confirmed by landscape plans, the curation of views, the integration of open space elements, and the modulation of the building envelope collectively reduce the visual impact of the built form. The resulting interface offers improved visual absorption capacity, consistent with the principles outlined in the NSW Heritage Manual and GANSW design guidelines ¹⁶⁴.

The updated proposal also benefits from a degree of contrast and legibility, consistent with Burra Charter principles. That is, the separation of old and new is deliberate, legible, and respectful in scale. As the GBA SHI notes, the approach avoids mimicry while maintaining a high level of visual sensitivity to context.

¹⁵⁹ Appendix A – Tzannes, Design Report: Gregory Place, Section 5.4 Built Form Strategies, 28 July 2025

¹⁶⁰ Ibid., and GBA Heritage, updated Statement of Heritage Impact, July 2025, pp. 9–13

¹⁶¹ Appendix E – Tzannes, Visual Impact Assessment: Gregory Place, 28 July 2025, p. 27

¹⁶² Appendix A – Tzannes, Design Report, Sections 5.2 Public Domain Strategies and 7.4.2 Shadow Diagrams

¹⁶³ Appendix P – GBA Heritage, updated Statement of Heritage Impact: Gregory Place, July 2025, Section 1.1.

¹⁶⁴ NSW Heritage Office, Heritage Manual, and Government Architect NSW, Better Placed: An integrated design policy for the built environment of NSW, 2017.

In conclusion, the amended development provides meaningful and measurable setbacks that protect the heritage values of Hambledon Cottage and Experiment Farm and reinforce the spatial function and landscape ecology of the Clay Cliff Creek corridor. These setbacks exceed minimum planning requirements and deliver an appropriate interface that balances urban form, heritage conservation, and public domain amenity.

8.1.4 Theme 4: The development will result in too many people in the area, creating safety concerns

Submissions raised concerns that the proposed development would result in an excessive number of residents in the area, leading to crowding and safety issues. These concerns are acknowledged but are not supported by demographic evidence, strategic planning objectives, or the expert assessments submitted with the application.

Population growth and location suitability

Parramatta Local Government Area (LGA) is expected to accommodate substantial growth over the coming decades. From 2021 to 2041, the LGA is projected to grow by 129,351 people—an average annual growth rate of 2.03 per cent, more than double the New South Wales average of 0.9 per cent ¹⁶⁵. This growth aligns with the objectives of the *Central City District Plan* and Parramatta’s strategic role as a metropolitan anchor under the *Greater Sydney Region Plan*.

The updated SIA, prepared by Forward Thinking, concludes that the Gregory Place site is highly appropriate for higher-density housing given its proximity to public transport, health services, education providers and employment:

“Given the City of Parramatta Council’s strategic intentions ... and those of the NSW Government, and the site’s proximity to a myriad of public and private services, its scale and close location to the Parramatta CBD renders the site an ideal location for the proposed development” ¹⁶⁶.

Safety through good design

Rather than reducing safety, the increased residential density—when supported by appropriate design—can improve passive surveillance and activate the public realm. The most recent iteration of the proposal has been developed in accordance with Crime Prevention Through Environmental Design (CPTED) principles, ensuring high visibility, active edges, and walkable spaces throughout the site.

The proposal delivers approximately 16,343 m² of landscaped open space, linking Clay Cliff Creek, Hambledon Cottage, and nearby parkland areas. The design facilitates 24/7 visibility across pedestrian paths and communal areas through:

- A continuous, accessible ground plane.
- Clear sightlines across and into shared spaces.
- Minimised canyoning effects along the channel walk; and
- Direct connections to established parkland networks ¹⁶⁷.

¹⁶⁵ DPIE, *Local Government Area Population Projections – Parramatta, 2023*

¹⁶⁶ Appendix X - Forward Thinking, *updated Social Impact Assessment: Gregory Place*, July 2025, p. 17

¹⁶⁷ Appendix A - Tzannes, *Design Report: Gregory Place*, July 2025, Section 5.2; see also Appendix E – Visual Impact Assessment.

A formal CPTED audit will be undertaken during detailed design to ensure integration of lighting, wayfinding, surveillance and public-private interface treatments ¹⁶⁸.

Community priorities

Community engagement found that while some submissions raised safety as a concern, it was not a priority issue for most stakeholders. In surveys conducted for the updated Community and Stakeholder Engagement Report, safety ranked lowest among six key issues identified by respondents. The results were as follows ¹⁶⁹:

1. Access to parks and other green spaces
2. Affordable housing
3. Recognition of Indigenous heritage and history
4. Access to services such as public transport, schools, medical services and shops
5. Cost of living
6. Urban areas that are safe

This indicates that the community's primary concerns relate to amenity, equity and cultural values—not crime or overpopulation. The project responds directly to those higher-ranked community priorities.

Traffic, parking and movement safety

Transport modelling shows that the proposal will generate 61 vehicle trips in the morning peak and 48 in the afternoon peak ¹⁷⁰. These volumes are considered low and are not expected to materially affect local road network performance. Importantly, the development's peak traffic generation does not coincide with peak activity periods at nearby schools or the co-cathedral, further limiting its impact.

The modal split is projected to favour sustainable transport:

- 55 per cent of trips are expected to be by public transport.
- 35 per cent by private vehicles.
- 10 per cent by walking or cycling.

A total of 353 bicycle parking spaces will support active transport, and the proposed layout includes upgrades to pedestrian connectivity. Parking rates comply with applicable planning controls, and loading will occur off-street, mitigating any traffic safety concerns.

Affordable housing and crime: evidence from research

Fears linking affordable housing to crime or safety risks are not supported by research. A major AHURI study found:

“There is no empirical evidence that affordable housing causes increases in crime. Negative community perceptions are often based on outdated stereotypes rather than actual impacts.” ¹⁷¹

The SIA affirms this conclusion:

“There is no clear or consistent evidence that the presence of affordable housing increases crime. Community safety is determined by a broad set of social, economic and spatial factors.” ¹⁷²

¹⁶⁸ Appendix X - Forward Thinking, *updated Social Impact Assessment: Gregory Place*, July 2025, p. 45 - 46

¹⁶⁹ Appendix Y - Forward Thinking, *Community and Stakeholder Engagement Summary*, July 2025, p. 9

¹⁷⁰ Appendix U - SCT Consulting, *Transport and Accessibility Impact Statement: Gregory Place*, July 2025, Section 6.3

¹⁷¹ Pawson, H., Milligan, V., Wiesel, I., and Hulse, K. (2013), *Addressing the stigma of public housing: Policy and place-making in Australia*, AHURI Final Report No. 202.

¹⁷² Appendix X - Forward Thinking, *updated Social Impact Assessment: Gregory Place*, July 2025, p. 34

Research by Arthurson (2012) has shown that well-managed affordable housing, when integrated into mixed-tenure environments and supported by quality design, does not produce adverse safety outcomes:

“Design and management play a far more significant role in shaping safety outcomes than the income profile of residents.”¹⁷³

Furthermore, Randolph and Holloway (2010)¹⁷⁴ emphasised that perceptions of safety are more strongly associated with spatial disadvantage and lack of investment than with tenure mix. The Gregory Place proposal addresses these variables directly, through high-quality design, professional management, and integration with local services.

Fire safety, flooding and construction health risks

Fire and Rescue NSW raised no objection to the proposal and identified no special hazards requiring modification. The proposal meets current access and firefighting design provisions¹⁷⁵. A Flood Emergency Response Plan (FERP) has also been prepared, supported by flood-resilient building layouts and evacuation routes, and satisfies all planning requirements under the applicable Development Control Plan.

Construction-phase safety concerns, including potential asbestos removal, will be addressed through regulated work practices. All demolition will occur in accordance with the *Work Health and Safety Act 2011* (NSW) and related instruments.

Conclusion

The Gregory Place proposal is consistent with both projected population growth and community expectations. It embeds safety in design, promotes sustainable transport and responds directly to what the community values: green space, affordability and cultural inclusion. Rather than overwhelming the area, it transitions a redundant industrial site into a well-managed, socially inclusive and physically safer neighbourhood.

8.1.5 Theme 5: the development will result in too many new cars in the surrounding streets which are already constrained by attendees to OLOLC and the Maronite College of the Holy Family (MCHF)

Traffic generation and parking provision

The Gregory Place proposal has undergone significant refinement in response to public submissions and the department’s request for information. The original 2022 concept proposed 634 on-site parking spaces. In contrast, the updated concept proposes 359 basement car spaces, a reduction of 275 spaces—or 43.4 per cent—reflecting a reduced number of apartments and lower gross floor area overall

¹⁷⁶.

The updated development is expected to generate 61 vehicle trips in the AM peak hour and 48 vehicle trips in the PM peak hour, with approximately 502 total trips per weekday¹⁷⁷. These figures are consistent with typical residential densities in a transit-accessible context.

Impact on surrounding streets and schools

¹⁷³ Arthurson, K. (2012), *Social mix and the city: Challenging the mixed communities consensus in housing policy*, CSIRO Publishing, Melbourne.

¹⁷⁴ Randolph, B. and Holloway, D. (2010), *Neighbourhood disadvantage, social mix and housing tenure: Resident perceptions in Sydney*, *Urban Policy and Research*, Vol. 28, No. 2, pp. 135–149.

¹⁷⁵ Fire and Rescue NSW, Referral advice correspondence, July 2025.

¹⁷⁶ Appendix U - SCT Consulting, Transport and Accessibility Impact Statement: Gregory Place, July 2025, Section 5.1.1, p. 38.

¹⁷⁷ Ibid Section 5.1.3, p. 39.

Importantly, SCT Consulting has specifically assessed traffic impacts relative to nearby sensitive uses, including OLOLC and the MCHF. The assessment concludes that peak traffic movements associated with the proposed development do not coincide with the school pick-up and drop-off periods, and as such, will not exacerbate existing school-related congestion ¹⁷⁸.

Furthermore, the Gregory Place site has direct access to James Ruse Drive, allowing vehicle traffic to bypass the more constrained local network. As a result, key intersections such as Alice Street and Alfred Street are not expected to experience adverse performance outcomes during peak periods ¹⁷⁹.

Comparative impact versus industrial use

If the site were to remain in, or revert to, industrial use—as permitted under the current E4 zoning—the associated traffic volumes would likely be significantly higher, particularly involving commercial vehicles and heavy goods movement. SCT Consulting notes that:

“The proposed traffic generation from the residential development is lower than a potential redevelopment for industrial use, which would typically generate more vehicle movements and freight-related impacts” ¹⁸⁰.

Conclusion

The traffic assessment provides a clear and detailed basis for concluding that the Gregory Place proposal:

- Will not exacerbate school-related congestion.
- Provides an appropriate number of car parking spaces, consistent with SEPP and DCP provisions.
- Generates lower traffic volumes than permissible alternate uses.
- Will integrate safely with the surrounding transport network.

The concerns raised in submissions are acknowledged but not supported by the traffic evidence or expert modelling undertaken.

8.1.6 Theme 6: The development will result in insufficient parking in the area

Parking provision and compliance

The proposed parking provision complies with all applicable planning controls, including the Housing SEPP 2021 and the *City of Parramatta Development Control Plan*. A total of 359 car parking spaces will be provided across the site, of which 87 spaces are dedicated to visitors, with the balance allocated for residents and service functions ¹⁸¹.

SCT Consulting confirms that the provision is consistent with the required rates, and appropriate in the context of the site’s location and intended mode share. The proposal supports a modal shift to public and active transport, consistent with Transport for NSW and council policy directions ¹⁸².

Demand-based justification

The parking strategy has been informed by detailed analysis of car ownership rates and census travel data for the local area. This evidence demonstrates that demand for car parking in similar high-density

¹⁷⁸ Ibid, Section 5.2.2, p. 41.

¹⁷⁹ Ibid, Section 6.3, pp. 51–52.

¹⁸⁰ Ibid, Section 5.1.3, p. 40.

¹⁸¹ Ibid., section 4.3, p. 34.

¹⁸² Ibid., section 4.3.2, p. 35

and well-connected precincts is significantly lower than traditional suburban contexts. Accordingly, the provision of 359 spaces strikes an appropriate balance, avoiding overprovision that would undermine public transport use while ensuring that demand is met on-site ¹⁸³.

Importantly, earlier iterations of the concept included 634 parking spaces. In response to agency feedback, planning policy, and a reduced apartment yield, the number of spaces has been significantly reduced. This also responds to concerns raised by Transport for NSW, council, and community members regarding the potential oversupply of car parking at the expense of open space and sustainability outcomes ¹⁸⁴.

On-street parking

With 87 visitor spaces provided, demand for on-street parking is expected to be minimal. No changes are proposed to existing public on-street parking arrangements. Furthermore, the integration of on-site visitor and service parking in basement locations ensures that the proposal will not displace or compete with public parking in surrounding streets ¹⁸⁵.

Conclusion

The Gregory Place parking strategy is consistent with adopted planning policies, empirically based on local travel behaviour, and responsive to community and agency input. The number of spaces has been significantly reduced compared to the original scheme, with no adverse impact anticipated on the availability or accessibility of on-street parking in the surrounding locality.

8.1.7 Theme 7: There is too much on site parking within the development

Reduction in on-site parking

The number of on-site parking spaces has been significantly reduced through the iterative design and assessment process. The previous iteration of the scheme included 634 spaces. In response to agency feedback, public submissions, and the department's request for information, this has been reduced to 359 car parking spaces, a decrease of 275 spaces or approximately 43.4 per cent ¹⁸⁶.

Compliance and contextual benchmarking

The proposed parking provision fully complies with the requirements of both the Housing SEPP 2021 and the *Parramatta Development Control Plan 2011*. It equates to an average of 1.1 spaces per dwelling, a reduction from the original proposal of 1.3 spaces per dwelling. If only resident spaces are considered (272 spaces), the provision equates to 0.85 spaces per dwelling ¹⁸⁷.

SCT Consulting's assessment confirms that this level of parking is consistent with observed local car ownership patterns and demand profiles for comparable housing typologies in inner metropolitan areas. Their analysis supports the view that the revised level of on-site parking is not excessive and instead reflects a practical and evidence-based balance between user needs and policy objectives ¹⁸⁸.

Strategic justification

While the provision exceeds the minimum rates under the Housing SEPP, it remains **18 per cent below** the DCP's nominated requirements, offering an appropriate compromise. The slightly higher-than-SEPP provision enables flexibility for future residents, including families, while avoiding overprovision that could incentivise car dependency in a well-serviced urban environment ¹⁸⁹.

Conclusion

¹⁸³ Ibid., section 4.3.1, p. 34.

¹⁸⁴ Ibid., section 5.2.1, p. 41.

¹⁸⁵ Ibid., section 5.2.2, p. 42.

¹⁸⁶ Ibid., section 4.3.1, p. 34.

The parking strategy has been refined to reduce the overall number of spaces, respond to local car ownership trends, and align with planning policy. The level of provision is considered appropriate and supported by expert analysis. It will avoid the creation of an over-supplied, vehicle-dominated environment and instead support a sustainable urban outcome.

8.1.8 Theme 8: The proposal is incompatible with its context

The proposal has been substantially refined through iterative design review to ensure compatibility with the site's highly sensitive historical context. A key transformation is the removal of the redundant industrial factory building, which for over 75 years severed visual and physical connections between three of New South Wales' most important colonial sites: Hambledon Cottage, Experiment Farm, and Elizabeth Farm. Its removal restores historical alignments, view corridors, and curtilage connections, enabling the re-establishment of a meaningful and integrated cultural landscape ¹⁸⁷.

Compatibility with historical context

The updated proposal achieves compatibility through carefully controlled height, building articulation, and material response, with no built form placed directly behind Hambledon Cottage. This respects the heritage setting, preserving its visual primacy and landmark function within the precinct. New buildings are sited away from direct sightlines, and sightlines between Experiment Farm and Hambledon Cottage are retained or enhanced ¹⁸⁸.

The Statement of Heritage Impact concludes that:

- Built form has been pulled back to respect historic boundaries and landmark views.
- The visual prominence and setting of SHR-listed cottages is retained and enhanced.
- The development provides opportunities for increased public interpretation of the site's colonial past ¹⁸⁹.

These outcomes are supported by the Visual Impact Assessment, which notes that the proposed massing strategy—relying on stepping, recesses and open space buffers—delivers a significantly reduced visual impact when compared with the industrial facility currently on the site. ¹⁹⁰

Integration of First Nations values

In parallel with its response to colonial heritage, the proposal incorporates First Nations values into the evolving cultural narrative of the site. The Aboriginal Cultural Heritage Assessment confirms opportunities to embed cultural interpretation into the design of the creek corridor, native landscaping and pedestrian spine—acknowledging Aboriginal connection to Country and the cultural importance of freshwater landscapes. ¹⁹¹

This adds a new and inclusive layer of significance, enriching the setting of the heritage items without diminishing their individual historic values.

Public access and cultural connectivity

The proposal reintroduces pedestrian access between all three cottages, strengthening legibility of the heritage landscape. Landscape and movement strategies create both axial and meandering routes

¹⁸⁷ Appendix P - GBA Heritage, *Statement of Heritage Impact – 2A Gregory Place, Harris Park*, July 2025, pp. 20–21.

¹⁸⁸ Ibid pp. 12–16.

¹⁸⁹ Ibid, pp. 18–19

¹⁹⁰ Appendix E - Tzannes, *Visual Impact Assessment – Gregory Place*, July 2025, pp. 8–12

¹⁹¹ Appendix S - Dominic Steele, *Aboriginal Cultural Heritage Assessment – Gregory Place, Harris Park NSW*, Steele Environment & Heritage, June 2025.

through the site, aligned with former paddock and estate patterns, supported by the design analysis in the consolidated Design Guidelines.¹⁹²

Conclusion

The updated proposal responds sensitively to the site's colonial and pre-colonial heritage context. It removes incompatible industrial fabric, introduces a respectful and varied built form, restores public connectivity between SHR-listed sites, and integrates Aboriginal values into the urban and cultural structure. These design outcomes are confirmed by the findings of GBA Heritage, Coast History & Heritage, and the Tzannes Visual Impact Assessment, and collectively support a finding of strong contextual compatibility.

8.1.9 Theme 9: The proposal has a large impact on and is inconsistent with the heritage context and the setting of the three cottages

Refer to GBA Heritage's updated Statement of Heritage Impact report Sub-sections 7.1 and 7.6.

The main entry to Hambledon Cottage was originally from the east side. The current entry on the north side was provided in the 1850s, showing that the primary elevation of the cottage was on the east side, with a large verandah towards Elizabeth Farm, with its rear secondary buildings located towards the nearby property boundary with Experiment Farm. Being constructed in 1822, while Harris's Experiment Farm Cottage was constructed in 1835, there was no historic visual and social connection between Hambledon Cottage and Experiment Farm Cottage just as there was none between Macarthur and Harris. There are already many mature trees that block the Hambledon Cottage and Experiment Farm Cottage visual relationship and these will be retained. The proposal is on land between Hambledon Cottage and Clay Cliff Creek stormwater channel escarpment, occupied from 1875 by Neals cottage. While the updated new buildings will have a visual presence to the south of Hambledon Cottage, they are located as the side view of the historic cottage, and thus will have no adverse impact on its original backdrop, which has been already affected by the high-rise buildings of the Parramatta CBD.

The amended proposed development includes three sub-precincts which have been created to reflect their distinct identities shaped by their settings. The proposed built forms have been carefully developed from co-design process, integrating built form and landscape. The proposed built forms in each sub-precinct will reflect their distinct identity and setting.

The amended proposal includes the integration of the built form and landscape to create an appropriate landscape setting which will contribute to and enhance the landscape setting of heritage items in the vicinity.

The larger 'Heritage Context' now includes the evolved character of the Harris Park Precinct, of which, from a heritage standpoint GBA Heritage concludes that that updated proposal is compatible.

Refer to section 3 of the Tzannes Visual Impact Assessment (appendix E). While the development will impact the view toward Hambledon Cottage, it is less than the impact of the prior development proposal. It also includes views where the background is less impacted by the buildings behind due to the removal of the industrial complex.

8.1.10 Theme 10: Cottage blue sky background is impacted by the proposal

Hambledon Cottage was originally designed with its principal elevation facing eastward toward what is now Gregory Place, with the current entrance on the north side added in the 1850s. The visual setting of Hambledon Cottage has already been substantially impacted by surrounding urban development,

¹⁹² Appendix A - Tzannes, Design Report section 8 - Gregory Place Consolidated Design Guidelines, July 2025, pp. 19–24

particularly from the north and east where the original ‘blue sky’ backdrop has been intruded upon by approved and constructed high-rise buildings in the Parramatta CBD. The historic orientation of the cottage faced east toward Gregory Place and Elizabeth Farm, not south toward the subject site. While the new proposal introduces new built form to the south, this elevation represents the cottage’s former side yard and not its primary address or curtilage interface.¹⁹³

The updated design significantly improves the visual relationship of Hambledon Cottage to its surroundings through the removal of the dominant existing factory building, which reaches a height of 24–25 metres and currently interrupts and detracts from both the visual setting and blue sky sightlines behind the heritage item. This building’s bulky and uninterrupted form sits closer to Hambledon Cottage than the proposed future envelopes and has no contextual landscaping or modulation.¹⁵¹

By contrast, the proposed built form is more refined, setback from the site boundaries, and broken into separate buildings divided by a new green spine corridor. The increased separation and variation in height between Buildings A and B create a deeper visual recess, establishing a strong landscape view corridor from Gregory Place and Hambledon Cottage toward Clay Cliff and OLOLC above the cliff.⁴²

The design incorporates extensive landscaping, including additional canopy trees and perimeter plantings that soften and screen the development from adjacent heritage items. This landscape treatment both conceals parts of the new envelope from view and integrates the site into the broader parkland setting of the colonial estates.

Importantly, the removal of the existing industrial structure reopens views from Hambledon Cottage across the site that have been lost for more than 75 years. The proposed built form, while visible, will be largely filtered through vegetation and presented as a lower scale backdrop than the industrial predecessor.⁴²

This visual transition is supported by the GBA Heritage Statement of Heritage Impact, which concludes that the proposal enhances the visual relationship between Hambledon Cottage, Elizabeth Farm, and Experiment Farm through improved legibility, access, and landscape continuity across the site.¹⁹⁴

8.1.11 Theme 11: Heritage trees in the reserve are not adequately considered, nor their connection between cottages

The updated scheme demonstrates a sensitive and evidence-based approach to heritage tree retention and landscape connectivity across the Harris Park Colonial Precinct. Contrary to perceptions raised in submissions, the refined built form and basement footprint have been specifically adjusted to enhance the protection of mature trees of heritage significance, while promoting improved physical and visual relationships between the precinct’s key colonial elements.

Heritage tree retention and landscape integration

The proposed development has been deliberately set back from the northern and western site boundaries to allow for the retention of significant mature trees, including T181, T190, T191 and T192. These trees are located adjacent to the Hambledon Cottage Reserve and are acknowledged for their high landscape and cultural value. The arborist assessment confirms that these specimens will be retained and are not subject to impact from the proposed basement excavation or construction activities¹⁹⁵. These trees form a critical part of the visual structure of the precinct, marking the presence of historic cottages and enhancing the setting of Hambledon Cottage in particular.

¹⁹³ Appendix P – GBA Heritage Statement of Heritage Impact, 2A Gregory Place, July 2025, Sub-sections 7.1 and 7.6.

¹⁹⁴ Appendix P – GBA Heritage Statement of Heritage Impact, 2A Gregory Place, July 2025, PP. 52-55

¹⁹⁵ Appendix FF – Horticultural Management Services, *Arboricultural Impact Assessment – 2A Gregory Place*, July 2025, Section 4.2, pp. 10–13.

As identified in the submitted Design Guidelines, the western edge of the development is described as the “Parkland Setting” and is intended to reinforce open space continuity with adjacent public reserves, including Queen’s Wharf Reserve, James Ruse Reserve, and Experiment Farm Reserve ¹⁶⁸. This landscape zone strengthens the spatial organisation of the precinct by integrating vegetated corridors and canopy trees that provide continuity across historic and contemporary boundaries.

Hydrological independence of heritage trees

Concerns raised regarding the impact of excavation and basement construction on groundwater access for heritage trees have been comprehensively addressed. The Reditus hydrogeological advice confirms that the proposed basement structure will be situated entirely above the regional water table, and that there will be no material groundwater drawdown within the root zones of trees on the site or in adjoining reserves ¹⁹⁶. At the basement edge, drawdown is estimated at less than 5 metres, reducing to under 3 metres at 10 metres from the structure. This is well below typical tree root depths for species such as oaks, pines and eucalyptus, which commonly exceed 3 metres.

Further, both the NSW DCCEEW GDE spatial layer and the Australian Government’s GDE Atlas confirm that the site does not lie within, or adjacent to, any mapped Groundwater Dependent Ecosystem (GDE) zones ¹⁹⁷. As such, there is no hydrological evidence to suggest the heritage trees are reliant on groundwater availability.

Visual continuity and tree-based heritage connectivity

The historic cottages—Hambleton, Elizabeth Farm and Experiment Farm—are not visually connected in terms of direct sightlines, due to the intervening built form and mature vegetation. However, the large, tall trees that define each curtilage function as landscape beacons, reinforcing spatial relationships between the sites. The Statement of Heritage Impact identifies these tree canopies as some of the only continuous visual cues across the precinct and emphasises their heritage value in terms of scale, presence, and historical layering. ¹⁹⁶

The proposed development strengthens this role by introducing a new landscaped “Green Spine” between Buildings A and B, aligned to maintain a broad view corridor toward Hambleton Cottage and framed by retained and new canopy vegetation. This design approach supports both ecological and visual continuity, reinforcing the colonial structure of the precinct while expanding public access.

Conclusion

The proposal reflects a well-documented and professionally supported commitment to the retention and protection of heritage-significant trees, and to their ongoing function as spatial and visual links across the Harris Park Colonial Precinct. The hydrological and arboricultural evidence confirms that no harm will arise to these trees as a result of the proposed development. Instead, the project enhances their significance through design integration, improved separation, and reinforced visual connectivity.

8.1.12 Theme 12: Aboriginal archaeology is not adequately considered

The approach to Aboriginal archaeological management for the Gregory Place site has been developed in accordance with the current conditions of the site and in consultation with relevant archaeological expertise. The site remains occupied by substantial building structures and significant fill material, much of which is potentially contaminated. These conditions prevent immediate Aboriginal archaeological test

¹⁹⁶ Reditus Consulting, *Hydrogeological Advice Letter – Gregory Place*, 25 July 2025, Sections 2.3, 3.1 and Appendix B

excavation, as such investigations require prior demolition and contamination assessment to ensure safe and meaningful access to the natural soil horizons likely to contain in situ Aboriginal objects .¹⁹⁷

Dominic Steele Consulting Archaeology has confirmed that the current planning stage limits the ability to carry out field investigations, but that a staged and respectful process is proposed. This process includes future consultation with Registered Aboriginal Parties (RAPs), the preparation of a revised Aboriginal Cultural Heritage Assessment Report (ACHAR), and the development of an appropriate Research Design and Test Excavation Methodology (RDTEM). The RDTEM will be consistent with methodologies used across comparable sites within the Parramatta area, thereby enabling comparative archaeological analysis and integration with regional datasets .¹⁹⁸

Importantly, no Aboriginal objects have been identified to date at the Gregory Place site through available desktop research or field survey, and there is no registered Aboriginal site recorded within or directly adjacent to the development footprint . However, the project acknowledges that the area may retain some archaeological potential, particularly in deeper soil contexts, and this potential will be evaluated post-demolition and remediation.

The updated Aboriginal Cultural Heritage Assessment also confirms the commitment to ongoing engagement with RAPs and Heritage NSW, ensuring cultural values are appropriately respected, incorporated and protected. This includes seeking feedback on the RDTEM prior to implementation and incorporating RAP cultural values and endorsement as part of any excavation strategy¹⁹⁹.

This staged and adaptive strategy reflects best practice heritage management under the applicable guidelines, including the NSW Heritage Act 1977 and the Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010. It ensures that archaeological investigation is undertaken at an appropriate time in the planning and development sequence while maintaining integrity of process and respect for Aboriginal stakeholders.

8.1.13 Theme 13: The application has not adequately considered the retention of trees on the site

The revised concept responds directly to public submissions and agency feedback by prioritising the retention of existing trees of moderate to high value. The updated proposal demonstrates a strengthened commitment to tree preservation and canopy replacement, particularly in perimeter areas where setbacks have been increased to accommodate root zones and minimise encroachment into Tree Protection Zones (TPZs).

As noted in Section 2 of the Arboricultural Impact Assessment (AIA) prepared by Horticultural Management Services, trees with high retention value are to be retained, with removals limited to those that are either unsafe, inappropriate for the urban setting, or of low arboricultural merit due to structure or species. The revised scheme maximises opportunities to protect healthy specimens, particularly on the north-western and northern boundaries, and avoids any works within the TPZs of retained trees without appropriate management protocols in place.²⁰⁰

¹⁹⁷ Appendix R - Dominic Steele Consulting Archaeology, *Response to Public Submissions – Aboriginal Archaeology* (July 2025), pp. 1–2.

¹⁹⁸ Ibid pp. 2–3.

¹⁹⁹ Appendix S - Dominic Steele Consulting Archaeology, *Aboriginal Cultural Heritage Assessment Report – Gregory Place* (June 2025), pp. 18–19

²⁰⁰ Appendix FF - Horticultural Management Services, *Arboricultural Impact Assessment – 2A Gregory Place, Parramatta* (v7, 21 July 2025), Section 2, pp. 6–8

Where removal is necessary, compensatory planting has been integrated into the landscape design. As detailed in the AIA and design report, advanced 100-litre canopy trees will be planted within widened deep soil zones located along the site perimeter. These areas exceed the minimum DCP requirements and are intended to support long-term urban canopy regeneration consistent with the council’s urban forest and biodiversity objectives.²⁰¹

The design report (Section 3.3) further confirms that building setbacks have been materially adjusted to support retention outcomes. Specifically, setbacks to the north-western corner have been increased to accommodate existing mature trees, while the northern boundary setback has been widened by approximately 20 per cent. This adjustment allows for the retention of significant existing trees and enables the introduction of additional large-form tree species with high landscape and ecological value.

42

In summary, the proposal not only demonstrates improved tree retention relative to earlier concepts, but also provides a well-considered landscape response that delivers long-term canopy cover, enhances visual amenity, and respects the ecological contribution of mature trees on the site.

8.1.14 Theme 14: The proposal does not provide for the interpretation of the significant heritage of the precinct

The revised proposal embeds a strong commitment to heritage interpretation through both its spatial structure and integrated design response. This has been advanced through a collaborative design process between Tzannes (architecture and urban design) and Yerrabingin (Connecting with Country and landscape architecture), working together to establish a layered interpretive framework that engages with pre-colonial, colonial and contemporary multicultural histories.⁴²

The proposal embraces the opportunity presented by the site’s unique position—framed between three State-significant colonial homesteads (Elizabeth Farm, Experiment Farm and Hambledon Cottage)—to contribute to the narrative of the precinct by enhancing interpretive understanding, without competing visually or functionally with the heritage buildings themselves. Section 5.1 of the Tzannes design report outlines the approach, which draws on First Nations design principles to articulate a deeper cultural reading of the site. This includes the creation of a connected open space framework that draws on traditional pathways, water movement, and seasonal landscape patterns as part of a narrative-based landscape strategy.⁴²

As outlined in the updated Statement of Heritage Impact prepared by GBA Heritage, the design introduces interpretive elements throughout the publicly accessible Green Spine and within the escarpment landscape to reinforce the cultural layering of the precinct. These interventions include opportunities for signage, curated walkways and integrated public art reflecting Aboriginal, colonial and migrant histories. These strategies will enhance cultural interpretation, particularly in relation to the original ephemeral pond system associated with Clay Cliff Creek and the broader heritage precinct context.¹⁶⁴

The development will also deliver substantial improvements to the public domain interface with Clay Cliff Creek, which is currently neglected and fragmented. By daylighting and formalising access along the creek corridor, the project not only restores the ecological visibility of this heritage landscape feature but enables the historic chain of freshwater ponds to be appreciated by the public, supported by interpretive design measures.^{42 202}

²⁰¹ Ibid Section 4.4, pp. 13

²⁰² Appendix A - Tzannes, *Consolidated Design Guidelines – Gregory Place* (28 July 2025), Section 5.3, p. 56; Appendix P - GBA Heritage, *Statement of Heritage Impact*, Section 7.4, p. 43.

Importantly, the proposal does not compromise any identified heritage interpretation strategies of the Harris Park precinct. It aligns with the precinct-wide interpretive themes outlined in the 2020 Lee Symington Johnston (LSJ) heritage interpretation report, and in many respects strengthens them through physical and visual connections, enhanced permeability, and cultural storytelling embedded in the built and landscape form. ²⁰³

8.1.15 Theme 15: The proposal does not consider the views into and out from OLOLC, including the importance of OLOLC on the skyline and the current openness

The updated scheme carefully considers the relationship between the proposed built form and OLOLC, recognising its visual prominence and cultural significance in the Harris Park precinct.

As part of the design evolution, the proposed building envelope immediately adjacent to OLOLC has been reduced from seven to four storeys, with significant upper-level setbacks introduced to improve solar access, privacy, and visual openness between the Cathedral, the adjacent childcare centre and the proposed buildings ²⁰⁴. These setbacks also assist in managing bulk perception when viewed from Gregory Place.

Importantly, the revised landscape strategy introduces a new, publicly accessible green spine corridor which visually connects Hambledon Cottage to OLOLC. This view corridor reinstates a previously lost axial view by removing the existing factory building, which currently obstructs visual connectivity between the two sites. This axis will enhance wayfinding and legibility while creating a visual narrative linking the colonial-era Hambledon Cottage with the post-war multicultural landmark of OLOLC. ¹⁶⁴

The Visual Impact Assessment confirms that views from within OLOLC toward the development site are limited to restricted openings such as fire doors and that primary liturgical or congregational spaces will not be materially impacted by the proposal. Additionally, a combination of landscaped screens and non-accessible rooftops are proposed to mitigate any incidental overlooking from upper levels of the new buildings. ¹⁶⁴

The Visual Impact Assessment (Section 2.5) further notes that OLOLC's visibility from the broader surrounding precinct is already constrained by existing development and topography, particularly to the north, and the proposal does not substantially alter this condition. ²⁰⁵

The updated Statement of Heritage Impact supports the proposition that the replacement of the existing 24–25 metre-high industrial factory—which currently dominates the outlook from OLOLC's northern foreground—with a lower, better-articulated and landscaped form will result in an improved contextual outcome for the Cathedral's setting. ¹⁶⁴

The design report also confirms that these urban and landscape gestures are not incidental but are part of a deliberate design move to embed interpretive and heritage-linked connections through the site, reinforcing cultural layering and enhancing place legibility within the precinct. ²⁰⁵

²⁰³ Lucas Stapleton Johnson, Comprehensive Harris Park Colonial Precinct Heritage Assessment and Statement of Significance.

²⁰⁴ Appendix E – Tzannes, *Visual Impact Assessment*, July 2025 Section 2.5

²⁰⁵ Appendix A – Tzannes, *updated Design Report*, July 2025, Section 5.1

8.1.16 Theme 16: The ground plane has not been adequately considered, including the extent of deep soil

The ground plane of the Gregory Place proposal has been the subject of careful and considered landscape design, informed by a First Nations-led framework and contextualised within the historic Harris Park precinct. The design is guided by four key principles: ⁴²

1. **Stitching the site in place** – This principle focuses on blurring site boundaries and connecting the subject site to surrounding landscapes, including the Clay Cliff Creek channel, Hambledon Cottage, and the Parramatta River. Planting typologies and water elements are employed to reinforce the site’s cultural and ecological context within Burramattagal Country .
2. **Tension nodes** – Areas of spatial tension between built and natural forms have been reinterpreted as culturally meaningful spaces for gathering and interpretation. These are intended as sites for grounding, storytelling, and learning, and are proposed to incorporate art that reflects pre-colonial and multicultural narratives .
3. **Creating places of connection** – The updated landscape structure establishes a continuous and legible open space system across the site, with generous pedestrian movement corridors connecting new public domains, shared spaces, and the wider park and creek interface .
4. **Creating places of respite** – Microclimates formed between buildings are to be planted with dense, layered vegetation to deliver comfort, privacy and amenity. These internal garden spaces offer respite and reinforce the precinct’s ecological values.

These strategies are reinforced through the provision of generous communal open spaces and deep soil zones. Section 7.4.5 of the design report includes detailed diagrams demonstrating compliance with deep soil provisions and showing how these areas support large canopy trees and stormwater management outcomes . The diagrams also confirm that communal open space is functionally and equitably distributed, ensuring all buildings benefit from direct access to landscape amenity.

Visualisation materials (Section 7.7) illustrate the spatial quality and pedestrian experience across the ground plane, confirming that the design integrates architecture and landscape to form a cohesive public realm experience .⁴²

In terms of cultural interpretation, the proposal includes a First Nations-designed landscape that accommodates cultural gathering and ceremony spaces. These elements are directly linked to landscape structure and are consistent with Connecting with Country principles. Section 8 of the GBA Statement of Heritage Impact confirms that the updated open space strategy balances colonial interpretation with First Nations and multicultural narratives, enhancing the overall legibility and civic role of the site .¹⁹⁵

8.1.17 Theme 17: First Nation design principles and integration haven’t been adequately considered

The updated concept proposal places First Nations values and knowledge systems at the heart of the design process, achieved through a deliberate and sustained co-design methodology. This approach was undertaken collaboratively by Tzannes (Urban Design and Architecture) and Yerrabingin (First Nations-led Landscape Architecture and Cultural Design) and is embedded throughout the updated design framework for Gregory Place.

Central to this approach is the recognition of Country—not as a metaphor—but as a living, interconnected entity guiding the relationship between people, place, landscape, and built form. This ethos is detailed in Section 4.2.2 of the design report, which sets out key responses and recommendations under Yerrabingin’s Connecting with Country methodology ⁴². Key elements include:

1. **Walk on Country:** A dedicated engagement session was undertaken with thirteen First Nations community members. This session directly informed the spatial organisation and interpretive intent of the project, guiding decisions about movement, planting, ceremony, and outlook.
2. **Elemental Connections:** The updated proposal incorporates symbolic and literal references to *Sky Country*, *Wind Country*, and *Water Country*. These are manifested through:
 - Rooftop terraces with open sky vistas,
 - Vegetated corridors that respond to prevailing wind flows,
 - Planting palettes that reflect seasonal variation and ecological layering.
3. **Cultural Narratives and Storytelling:** Local First Nations artists will be engaged during the detailed design phase to contribute public artworks, textural materials, and embedded narrative elements that promote understanding of Aboriginal knowledge systems within the site's open space and public realm settings.
4. **Ecological Response and Cultural Form:** The landscape design draws on endemic planting palettes, seasonal planting structures, pollinator ladders, and interpretive pathways to express the characteristics of Burramattagal Country. These elements are not only culturally resonant, but also support local biodiversity and ecological restoration objectives.⁴²

This alignment is further reinforced by the spatial structure of the ground plane, which includes areas for reflection, gathering and ceremony, and is explicitly designed to allow ongoing connection with Country to be maintained and celebrated.⁴³

The updated proposal represents a significant advancement from the original scheme by explicitly embedding First Nations design principles at all scales—from material and planting detail to spatial arrangement and interpretation. As such, it meets and exceeds contemporary expectations for cultural responsiveness and inclusive design in State Significant precincts.

8.1.18 Theme 18: The development does not adequately consider the impacts of flooding on the area and doesn't give consideration to OSD and WSUD requirements and impacts

The GRC Hydro flood assessment confirms that the proposed development is compatible with the local flood risk. The proposed development has been subjected to flood modelling that has been undertaken in accordance with Australian best practice (as per Australian Rainfall & Runoff 2019 Guidance). This modelling suggests that the proposed development is compatible with the flood risk for the site as in a 1% AEP event (with loading applied to emulate climate change), the site is subject hazards of H1 and H2 (low hazard) and the addition of the proposed development to the site has been modelled to result in no adverse flood level increases to adjacent properties.

Furthermore, the updated Integrated Water Management Plan (IWMP) prepared by Kozarovski and Partners provides a clear justification for the exclusion of an on-site detention (OSD) system. Specifically, modelling showed that installing an OSD tank would potentially exacerbate flooding in downstream areas. In response, the adopted stormwater strategy utilises a combination of reuse and treatment measures. These include:

1. Collection and reuse of rooftop runoff for irrigation purposes;
2. Capture and treatment of surface runoff through raingardens located in both the eastern and western corners of the site;
3. Treatment of overland flows entering the site from the north through the same raingarden infrastructure.

This integrated water strategy forms part of a broader Water Sensitive Urban Design (WSUD) approach and satisfies both functional stormwater performance requirements and the sustainability objectives outlined in the Parramatta Development Control Plan.

This theme is supported by the detailed WSUD, flood risk and overland flow sections of the IWMP and GRC flood assessments which provide comprehensive documentation to support the proposal. Further validation is also provided by the absence of any adverse hydraulic or hydrologic impacts in the context of post-development scenarios.

8.1.19 Theme 19: The proposed buildings lack appropriate amenity

The proposed development at 2A Gregory Place has been comprehensively designed to deliver high levels of amenity through a deliberately people-centric and landscape-integrated approach. Far from neglecting amenity, the iterative concept design has focused explicitly on enhancing liveability, health, comfort, accessibility and community outcomes—consistent with the objectives of the EP&A Act, Chapter 4 of the Housing SEPP and the Apartment Design Guide (ADG).

The existing industrial warehouse, a visually and environmentally degrading structure, will be replaced by a fine-grain, landscape-framed built form that has been shaped by extensive consultation and refined through an inclusive design process led by Tzannes (urban architecture), Yerrabingin (landscape and Country), and a multidisciplinary team of specialists. The removal of the 24–25 metre-high industrial structure will materially improve solar access, skyline openness, and streetscape experience for residents, neighbours, and visitors alike.

The proposed scheme includes substantial on-site amenity features, including:

- A generous green buffer adjacent to Hambledon Cottage Reserve that restores visual and ecological links between open space and the heritage setting.
- Multiple communal and private open spaces, including rooftop gardens and mid-block courtyards, supporting both passive and active recreation.
- A landscaped green spine and a reactivated channel walk that encourages permeability and casual surveillance across the site.
- Integrated public art, interpretive elements, and storytelling zones, informed by First Nations values and the heritage of the precinct.
- Street-facing activated edges, balconies, and fenestration patterns that prioritise daylight, views, and passive surveillance.

With regard to built form amenity metrics, the proposal demonstrates improved performance compared to the exhibited scheme. updated indicative ADG testing confirms that 77% of proposed apartments will receive at least two hours of solar access in mid-winter (up from 70.4%) and 63% of apartments achieve natural cross-ventilation (up from 60.5%) . These metrics comply with the ADG thresholds and reflect the improved design and orientation of built forms.

Noise amenity has been addressed through detailed acoustic modelling. The façade and glazing design will mitigate both operational and ambient noise sources, including peak noise events associated with outdoor Co-Cathedral activities. Internal noise levels will comply with relevant acoustic planning standards: 35 dB(A) Leq in bedrooms and 40 dB(A) Leq in living spaces, as verified in the Acoustic Report prepared by Rodney Stevens Acoustics Pty Ltd . Notably, the report concludes that predicted noise levels are manageable and will not compromise indoor amenity.

Social outcomes and place-making were central to the updated concept's rationale. As outlined in the SIA, the proposal has been purposefully crafted to foster inclusion, diversity, and wellbeing. The SIA highlights the project's contribution to housing diversity—offering a mix of housing types and affordability profiles tailored to different household needs—and its alignment with the principles of community building and social equity.

Importantly, the project seeks not merely to comply, but to exceed baseline expectations. As stated in the compatibility report, the guiding ambition is to “create a scheme of exceptionally high amenity so that people can live their best lives.” This includes a walkable, green, and climatically responsive urban environment that supports health, wellbeing, social connection, and a sense of belonging. The development transitions seamlessly from heritage to residential zones through a softened landscaped threshold that prioritises human comfort and dignity in design.

In summary, the proposed buildings do not lack amenity; rather, they embody a deliberately people-centred response to the site's opportunities and constraints. Through detailed design refinement, improved environmental performance, diverse housing typologies, strong landscape and cultural narrative, and integrated social infrastructure, the scheme sets a high benchmark for urban liveability. It is demonstrably compatible with its heritage, urban, and social context—and directly addresses concerns raised in public submissions.

8.1.20 Theme 20: The proposal will cause conflict with OLOLC

A detailed response to the concern that the proposal will cause conflict with OLOLC is outlined below. This response is grounded in a suite of technical studies provided with the application, including visual, acoustic, traffic, and operational assessments, as well as management plans that explicitly address potential impacts during both the construction and operational phases of the development.

Construction phase management

The project team has prepared a robust set of preliminary documents to ensure construction activities are managed in a way that minimises disruption to OLOLC and its surrounding community. These include a Construction Management Plan, Sediment and Erosion Control Plan, Remediation Action Plan, Construction Noise and Vibration Management Plan, and a Construction Traffic Management Plan. While these documents are preliminary due to the conceptual nature of the current application, they collectively establish a clear framework for controlling noise, dust, traffic, and environmental risks, and will be refined at future stages.

For example, the construction traffic management strategy includes measures to prevent peak hour congestion near OLOLC and prioritise safety during church events. Noise impacts from demolition and excavation phases have also been modelled and are within allowable thresholds with mitigation in place.

Operational compatibility and amenity management

Once operational, the development will be managed under a detailed Plan of Management, supported by a comprehensive Acoustic Assessment and a Transport and Accessibility Impact Statement. The Acoustic Assessment confirms that the building façade construction will ensure internal residential amenity remains protected during special outdoor events at OLOLC, such as services or community gatherings, even when amplified sound is used. Internal noise levels will meet the acceptable limits of 35 dB(A) Leq in bedrooms and 40 dB(A) Leq in living areas as per standard residential acoustic targets.

Visual and overshadowing impacts were also a key consideration. The updated Visual Impact Assessment (VIA) and Section 5 of the design report confirm that the built form adjacent to OLOLC has

been reduced from seven to four storeys, with additional upper level setbacks and landscaping introduced to soften the visual relationship between the development and the Cathedral grounds . Importantly, the Clay Cliff Creek channel—previously visually obscured—is now reactivated and integrated with the public domain, providing a landscaped foreground to the Cathedral, and reinforcing the ceremonial and spatial significance of the site’s axis .

Community integration and social cohesion

Beyond the technical studies, the project vision strongly embraces the social potential of the development to integrate with and strengthen the surrounding community. The planning team expressly hopes that new residents will become members of the local community—including the OLOLC parish—and benefit from the location’s proximity to cultural and faith-based amenities. The development offers a diversity of dwelling types, including adaptable and affordable housing options, which may be particularly attractive to parish members seeking to downsize, remain close to the Cathedral, or support intergenerational living models.

The proposed housing scheme is exceptionally well located to support and benefit from its proximity to a community-focused institution such as OLOLC. As a vibrant and active parish with a long-standing role in community building, social services, and cultural celebration, the Cathedral offers a suite of programs and opportunities that are likely to align closely with the needs and interests of future residents. These include spiritual services, social support, educational offerings, and community events—each of which may serve as important anchors of belonging and participation for individuals and families moving into the precinct. Moreover, the site’s strategic location near employment centres, transport, and civic infrastructure may appeal to members of the existing Cathedral community—including parishioners and clergy—who may seek to live within walking distance of the church and the wider Parramatta CBD. Rather than conflict, the adjacency of the development and the Cathedral presents an opportunity for mutual benefit, deepened connection, and the strengthening of place-based community life.

Importantly, the SIA confirms that the proposal has been deliberately designed to deliver inclusive, equitable and safe living environments. These outcomes are supported through a range of measures, including passive surveillance, open sightlines, lighting strategies, and the activation of ground level uses. Key pedestrian corridors and a permeable site layout are also intended to foster everyday interaction and neighbourly connection, consistent with Crime Prevention Through Environmental Design (CPTED) principles and contemporary place-making strategies.²⁰⁶

Conclusion

Accordingly, the proposal does not create conflict with OLOLC but seeks to sensitively respond to its presence, enhance its setting, and foster coexistence with new residential neighbours. All elements of potential disruption—be they acoustic, visual, traffic or social—have been identified, assessed, and mitigated through a coordinated suite of documents that are consistent with planning best practice and subject to iterative refinement throughout future design stages. In short, the proposal is not only compatible with OLOLC but seeks to be a respectful and valuable addition to the precinct.

8.1.21 Theme 21: The proposal will impact on OLOLC’s redevelopment potential

It is presently unclear what specific future redevelopment the OLOLC intends to pursue on its remaining landholding, nor what its expectations are regarding redevelopment potential. There is no current development application or planning proposal before council indicating a formal strategy for

²⁰⁶ Appendix X – Forward Thinking, updated Social Impact Assessment – 2A Gregory Place, Harris Park, July 2025, pp. 41–44.

intensification. Accordingly, the assertion that the Gregory Place proposal will inhibit future development by OLOLC is unsubstantiated and lacks material basis.

In contrast, the updated design for Gregory Place has been deliberately and carefully revised to support, rather than constrain, the long-term planning potential of the OLOLC site. As outlined in Section 5 of the *Consolidated Design Guidelines* report, key built form elements—such as setbacks, building height, view corridors, and landscape interface—have been refined through an iterative co-design process to respond directly to the Cathedral’s built form and usage pattern, while reducing amenity impacts to an absolute minimum.⁴²

Most notably, the proposed built form immediately north of OLOLC has been substantially reduced—from seven storeys in the exhibited scheme to four storeys in the updated scheme—with upper level setbacks introduced to further alleviate overshadowing, improve solar access, and ensure visual separation and privacy. These changes are documented through revised solar access modelling, shadow diagrams, and interface diagrams, which confirm that the proposal complies with the Apartment Design Guide (ADG) separation requirements and maintains appropriate setbacks to OLOLC land to the south and east.^{207 42}

It is also important to note that OLOLC has recently completed a five-to-six storey aged care facility on part of its landholding. The proposed development at Gregory Place does not impact that facility. The only undeveloped portion of the Cathedral landholding appears to be the existing multi-storey car park to the east. The subject proposal, by providing suitable setbacks and addressing ADG compliance, does not preclude redevelopment of that area should a future proposal emerge.

Rather than perpetuating the active industrial use that previously occupied the Gregory Place site—with its associated noise, traffic, emissions, and physical bulk—the current proposal removes that urban blight and replaces it with a residential precinct framed by landscape, pedestrian permeability, and view preservation. The new built form will present a low-activity and high-amenity edge to the OLOLC landholding. The transition from an intensive industrial operation to a landscaped, residential neighbourhood directly enhances the environmental and acoustic setting of the Cathedral and strengthens its long-term viability in the precinct.⁴³

In conclusion, the updated proposal at Gregory Place has been carefully tested against existing and reasonably foreseeable development contexts and does not constrain the OLOLC’s future planning potential. The physical and functional improvements at the shared interface between the two landholdings represent a net benefit to the Cathedral’s amenity, setting, and long-term redevelopment prospects.

8.1.22 Theme 22: The location is not appropriate for affordable housing

There is substantial evidence to demonstrate that the area is a very appropriate location for affordable housing. The proposal is well located in a rapidly growing location, which is well serviced and close to strongly growing employment markets.

Housing stress in the area

Harris Park is less advantaged when compared with Parramatta LGA, NSW, and Australia more broadly, and is characterised by both higher unemployment rates and lower median weekly household incomes.

These characteristics, as well as the relatively high populations of trade workers and key workers in both Harris Park and Parramatta, reinforce the importance of the proposed housing offering at the site.

²⁰⁷ Appendix E – Tzannes, Visual Impact Assessment , 28 July 2025 ; Consolidated Design Guidelines, Section 7.4.6 and 7.5.

Rental tenancy in Harris Park is higher than both Parramatta LGA and NSW, comprising 85 percent of occupied dwellings, while the remainder is either outright ownership or with a mortgage (or not stated). These figures indicate an existing demand for rental properties in the area, as well as an implied demand for more similar dwelling types as the population grows.

There is a very low rental vacancy rate and a high proportion of the community is in housing stress. The need in the area is severe with a rental vacancy rate below 3%, which is considered to be a locality in housing stress.

The economics report by Pacific Economics and Sustainability shows that rental vacancies in the 2150 postcode (Parramatta and Harris Park) dropped to 1.7 per cent in February 2025, with only 191 vacant properties available. This is down from (a still very low) 281 in December 2024.

The number of vacancies has been below 200 since the June quarter 2022 (except for a one-off in the December quarter 2024). Median rents rose from \$646 in March 2024 to \$700 in February 2025 – an 8.4 per cent increase through the year. In the three years between March 2022 and March 2025, rents have risen by 75.4 per cent, reflecting the undersupply of housing in the 2150 postcode area.

In the week of 9 March 2025, there were only 103 listed rental properties in the 2150 postcode. The least rent a household would pay for a two-bedroom unit in postcode 2150 was \$500. For a household earning between \$80,000 and \$90,000, there were only 3 listings available in the whole area.

Affordable housing

The council has prepared the Affordable Housing Action Plan 2023-2025 to guide ‘more urgent and direct action on council’s part and establish council’s policy positions relating to housing affordability. This Action Plan identifies direct actions and advocacy positions that council will take towards improving housing affordability in council during 2023-2025’.

The Action Plan outlines that housing stress persists as an issue in the Parramatta LGA, as with many other parts of Greater Sydney, due to Sydney’s high housing costs and generally high costs of living, as well as the relatively lower median household income of the area.

The Affordable Rental Housing Policy (2019) endorsed by the council, plans to achieve a reduction in housing stress across the LGA by increasing the provision of affordable housing through short-term and long-term strategies, such as the proposal that is subject of this application.

The benchmark for affordable housing is 30 per cent of gross income. Any higher than that, and those on 120 per cent of the median income or less are living in housing stress.

Households on moderate, low or very low incomes and key workers, who spend more than 30 per cent of their income on housing are impacted in their ability to pay for essential items like food, clothing, transport and utilities and are said to be experiencing housing stress. Affordable housing is targeted specifically to these groups to assist these households to remain in the private housing market.

By the measure of rental payment as a greater amount than 30 per cent of household income, almost 25,000 households experience housing stress in the Parramatta LGA - 34.1 per cent of the population. Suburbs with a greater proportion of renters, such as Harris Park, experience proportionally more rental stress, implying that housing stress is an issue for the growing renter populations of the Harris Park in particular.

In the Parramatta local government area (LGA), the median household income in the 2021 Census was \$2,051. A household with \$1,641 income per week (80 per cent of the median household income) can afford a rent of \$492 per week. Any higher and they are in housing stress.

A household with 120 per cent of the median weekly income (\$2,461) can afford to pay up to \$738 per week in rent before falling into housing stress. There were only 65 two-bedroom units that would have been affordable for a household on between 80 and 120 per cent of the Parramatta SA3 median income in the week of 9 March 2025. There were no affordable listings for a household on between 80 and 100 per cent of the median household income.

Housing stress in the City of Parramatta

Affordable rental housing is a key policy priority of council as outlined in their council Local Strategic Planning Statement (2020). Planning Priority 8 is oriented towards incentivising affordable rental housing delivery and providing for permanent affordable housing.

In addition, the City's Parramatta Local Housing Strategy (2020) addresses housing needs and guides residential growth over the next 20 years. The Strategy is aligned with broader state and regional planning frameworks, such as the Greater Sydney Region Plan and Central City District Plan, to ensure that housing development meets the needs of the growing local population while fostering sustainability and liveability.

The Strategy aims to provide sufficient housing to accommodate the projected population growth of Parramatta, ensuring the availability of diverse housing options to meet the community's changing needs.

It focuses on increasing the supply of affordable housing, particularly for low- to moderate-income households, and reducing housing stress throughout the growing community. The Strategy also promotes a mix of housing types, such as apartments, townhouses, and detached homes, to cater to the different needs of families, singles, the elderly, and people with disabilities.

A priority in the Strategy is that housing growth should be aligned with the delivery and operation of key social infrastructure, such as transport, schools, and healthcare. With this in view, the location of a potential housing development in relation to key infrastructure is especially important.

Given council strategic intentions and those of the NSW Government, and the site's proximity to a myriad of public and private services, its scale and close location to the Parramatta CBD renders the site an ideal location for the proposed development.

Parramatta LGA overall is expected to grow at a rate more than double that of NSW, with an average annual growth rate of two percent. The suburb of Harris Park is characterised by a generally younger population, including about 44 percent of couple families with children.

In the Parramatta LGA, couple families with children made up nearly 50 percent of the population.

The predicted growth of the LGA population, as well as the large populations of young people and young, and likely growing, families, are demographic characteristics that trigger the need for this proposal.

With a view to this current and future growth, there is a clear need for a new affordable housing in the area. The allowable industrial land use is no longer the highest priority from the perspective of council or NSW government planning. The young families in the area, existing and incoming, would benefit from the community offerings at the site beyond accommodation, through the open spaces, landscaping and pedestrian and cycleways, as well as proximity to services and growing employment markets.

Looking towards the future, this demographic of families will also be well-served by the variety of dwelling size and location. The proposed range of 1, 2 and 3 bedroom apartments allows for a dynamic, long-term and potentially intergenerational tenancy at the site: a potential that is ultimately strongly supportive of long-term community building and integration.

For more information, refer to section 5.2 of the updated SIA prepared by Forward Thinking and Section 3 of this RTS report.

8.1.23 Theme 23: There is a high vacancy rate of apartments in the area

The evidence presented under Section 2 of this report, and by the findings and evidence provided under the attached updated Economics Report (Appendix BB), suggests the opposite of the theme made by submissions that there is a high apartment vacancy rate in Harris Park and Parramatta.

In fact, the context of the Gregory Place proposal, is that Parramatta faces a substantial and growing shortfall in both overall housing supply and affordable rental housing. Rental vacancies are at historically low levels and rents have escalated rapidly, outpacing wage growth and placing significant pressure on households across a range of income brackets.

The attached economics report shows that rental vacancies in the 2150 postcode (Parramatta and Harris Park) dropped to 1.7% in February 2025, with only 191 vacant properties available. This is down from (a still very low) 281 in December 2024. The number of vacancies has been below 200 since the June quarter 2022 (except for a one-off in the December quarter 2024). Rents rose from \$646 in March 2024 to \$700 in February 2025 – an 8.4% increase through the year. In the three years between March 2022 and March 2025, rents have risen by 75.4%, reflecting the undersupply of housing in the 2150 area.

In the week of 9 March 2025, there were only 103 listed rental properties in the 2150 postcode. The least rent a household would pay for a two-bedroom unit in postcode 2150 was \$500. For a household earning between \$80,000 and \$90,000, there were only 3 listings available in the whole area.

A household with 120 per cent of the median weekly income (\$2,461) can afford to pay up to \$738 per week in rent before falling into housing stress. There were only 65 two-bedroom units that would have been affordable for a household on between 80 and 120 per cent of the Parramatta SA3 median income in the week of 9 March 2025. There were no affordable listings for a household on between 80 and 100 per cent of the median household income.

As demonstrated in Section 2 and the attached economics report, there are no rental listings in the 2150 postcode that are affordable for households earning less than \$1,500 per week (up to \$78,000 per year – for comparison, the national minimum wage is \$47,622 per year). For households in the \$1,500-\$1,999 weekly income bracket, there were 24 affordable in the week of 9 March 2025. There were 70 vacancies affordable for those with incomes between \$2,000 and \$2,999 per week (up to \$156,00 per year) and 9 listings available for incomes over \$3,000 per week. Together, there are 95 listings that are affordable for the 61,981 households earning below \$3,000 per week.

The median rent Parramatta is \$650 per week. A single full-time worker on the minimum wage would be paying over two-thirds of their income in rent on the median 2 bedroom apartment in March 2025.

Within this context, and in response to this misled theme by submitters, the Gregory Place proposal represents a timely and strategic response to the documented demand, delivering well-located, high-amenity dwellings that are affordable to a diverse mix of households, including key workers, families, and those otherwise at risk of housing stress. The proposal is consistent with State and local planning objectives and responds directly to the housing crisis articulated by the NSW Productivity Commission and other independent experts. The evidence base for intervention is overwhelming, and the case for new, fit-for-purpose affordable housing in Parramatta is clear and compelling.

8.1.24 Theme 24: The consultation process was inadequate

To seek stakeholder input into the EIS Concept DA submission, community and stakeholder engagement was undertaken between 25 April and 15 June 2022 and comprised:

- Stakeholder meetings and interviews with key agencies and those who will be impacted.
- Indigenous engagement with key community groups including 4 meetings and 4 interviews, and a session facilitated by an Indigenous expert consultant with 20 attendees.
- Letterbox drop of information pack including feedback options to 1,511 local residents and businesses.
- Community survey and associated web page.
- Direct avenues to connect with the project team through a dedicated phonenumber and email.
- The engagement methodology was undertaken in accordance with the Undertaking Engagement Guidelines for State Significant Projects.

The reach of communication through the letterbox drop was 1,511 residents and businesses. The information provided directly to the surrounding area about the proposal was comprehensive. This information also provided details on opportunities for feedback including the survey and phone and email contacts.

Notwithstanding the low participation rate, this phase of engagement produced findings that have been instrumental in the development of the updated Concept Plan as outlined below.

As engagement was occurring at the Concept DA stage, the discussions with key stakeholders and the community were at a relatively high level, broadly exploring the site and the opportunities and constraints to the future redevelopment. Following were the findings:

- There was agreement across all engagement participants that the site is of strategic importance and presents unique opportunities for redevelopment and renewal. It's close proximity to Parramatta CBD, its location on the new Parramatta Light Rail, and its vicinity to state significant heritage items were cited by many participants.
- History and heritage (including Aboriginal and Colonial history) were highly valued by the community, and it will be important for development on the site to respect and enhance these values.
- There was general support from most engagement participants for the site's redevelopment, and many indicated support for the Concept DA on the proviso that key impacts such as traffic, parking and overshadowing are managed on the site.
- A small number of community members who live close to the site are concerned about the proposal in particular:
 - -Height and density of the proposal
 - -The increase in traffic to the local area
 - -Potential impacts on the nearby Co-Cathedral and Hambledon Cottage

- Agencies including the Department of Planning and Environment and the council emphasised the importance of accessible pedestrian connections through the site, and the opportunity the proposal provided to “open up” and “re-connect” the site to the surrounding local area.
- The Department of Planning and Environment emphasised the importance of providing community benefit provisions through each stage of the proposal and not all at the end of the project. They also emphasised that the distribution and quality of common places (e.g. work from, home spaces, prayer spaces or gyms) will be important. These should ideally reflect the types of people likely to live there.
- Most participants were supportive and positive about the open space, landscaping and place making opportunities the proposal presented, particularly the Clay Cliff Creek walk. There was a desire for these spaces to be of high quality and useable.
- There was general support for affordable housing and Build to Rent components of the proposal. Several key stakeholders acknowledged the need for affordable housing in the Parramatta LGA, on the proviso that it is a high-quality living environment, well managed and a suitable density.
- A couple of stakeholders, including the council cited that there is currently pressure on parks, open space and recreational facilities in the LGA, and that where possible, the proposal could look to address some of these shortfalls, or at the least take the pressure off the current provision by providing adequate on-site facilities.

The EIS was exhibited by the Department of Planning, Housing and Infrastructure from 2-29 August 2022 and attracted 111 submissions (including multiple duplicate letters and petitions) commenting on the proposal across the following broad themes:

- The perceived incongruity with the surrounding natural and built landscapes including:
 - Potential adverse impacts on the heritage assets located close to the site (Hambledon Cottage, Experiment Farm and Elizabeth Farm)
 - Need for clearer connection between the design and Connecting with Country urban design methodology
- The height and scale of the built form, and perceptions of overdevelopment of the site
- Social amenity impacts on the local community, including traffic and parking impacts.

The updated Community and Stakeholder Engagement Report (July 2025) shows that the scheme has responded to views of stakeholders and community raised in the 2022 engagement and submissions. In the survey, 10 respondents supported the proposal, eight of which were unconditional. Five respondents opposed the proposal.

The updated SIA (July 2025) concludes that the social impacts that were likely to be generated through the SSD Concept Development Application (2022) have been substantially minimised in terms of magnitude and dimension.

8.1.25 Theme 25: Concerns were raised in relation to overshadowing; OLOLC, the childcare centre, heritage items, adjoining reserve and the channel walk

The updated scheme has been developed taking careful consideration of the impacts on neighbouring properties, including Hambledon Cottage, the Experiment Farm Reserve, OLOLC, and the man-made concrete stormwater channel.

Prior to updating the design, several studies were undertaken through the new co-design methodology to consider how the proposal affects neighbouring properties. Refer to the design report section 5.2 - 5.4; design strategies and built form strategies which consider solar amenity and public domain strategies. Objectives included:

- Provide Young Academics Early Learning Centre a minimum of 2 hours of solar access between 8am and 4pm during winter months, for not less than 30% (or 2.1m²) of the 7m² of outdoor space per child required, per the DPIE Child care planning guideline.
- Built form to step down adjacent to OLOLC, considering light and privacy for OLOLC and Young Academics Early Learning Centre - Harris Park.
- Ensuring no additional overshadowing of Experiment Farm reserve on 21 June between 10am and 2pm.
- Reducing the built form frontage to the Stormwater Channel and associated channel walkway, being widening the central open space, and creating breaks, courtyards and reducing the size of the footprints, to increase the solar access to the walkway.

Sections 7.4.2 shadow diagrams and 7.4.3 view from the sun diagrams of the design report demonstrate the results of this consideration where overshadowing impacts have been kept to a minimum.

8.1.26 Theme 26: Concerns were raised about the VIA not adequately showing views around and from OLOLC, the cottages and the heritage view corridor

In response to community and agency submissions raising concerns about the adequacy of the exhibited Visual Impact Assessment (VIA), the proponent has undertaken a detailed iterative review of the VIA. This process involved incorporating additional photomontages, refining the landscape and built form interface, and interrogating both contemporary and historical view connections more comprehensively. The refined VIA, prepared by Tzannes in collaboration with the heritage consultants, draws upon a multidisciplinary design and heritage approach to visual analysis and includes expanded visual catchment mapping and photomontage testing from key heritage and public domain locations.

The updated *Visual Impact Assessment* (Appendix E) and the GBA *Heritage Statement of Heritage Impact* (SOHI) provide a consolidated view of how the proposal interfaces with visually sensitive locations, including Our Lady of Lebanon Co-Cathedral (OLOLC), Hambledon Cottage, and the broader Colonial Heritage Precinct. Section 2.5 of the VIA includes detailed discussion of sightlines and landscape setting, including multiple vantage points from and toward OLOLC, the heritage cottages, and Clay Cliff Creek, with consideration of ground topography and vegetation cover. ¹⁰⁶

The assessment confirms that, contrary to claims of intrusive visual dominance, the flat landscape of Harris Park and the extent of existing built form and vegetation significantly limit the visibility of the proposal from many key heritage locations. The design has further responded by opening up a new, uninterrupted view corridor from Hambledon Cottage to OLOLC, replacing the current visual obstruction caused by the former industrial building. This new green spine includes First Nations-informed planting and interpretive landscape design and will visually link pre-colonial, colonial, and contemporary narratives across the site. ¹⁶⁴

Importantly, historical research undertaken as part of the heritage assessment confirms that no meaningful or intended view corridor ever existed between Hambledon Cottage and Experiment Farm Cottage, due to differences in their periods of construction and orientation. Hambledon Cottage was originally laid out to address the east, while its rear service buildings faced the Experiment Farm

boundary. The notion of a ‘historic’ view corridor between these two items was introduced in a 1997 study for local planning purposes and is not grounded in verifiable heritage significance. ¹⁶⁴

The updated Statement of Heritage Impact further clarifies that the view corridors referenced in the Parramatta Development Control Plan (PDCP) were not intended to preserve genuine historic sightlines but rather to loosely connect visually prominent colonial-era landmarks across the precinct. This distinction is important, as it highlights that the current proposal, rather than eroding heritage values, restores interpretive opportunity through curated landscape planning and thoughtful visual sequencing.

In summary, the community comments on this issue are appreciated and the revised VIA and supporting heritage analysis provide a robust and context-sensitive assessment of the project’s visual impacts. The proposal protects and enhances key sightlines to and from OLOLC and heritage cottages and introduces new interpretive opportunities aligned with landscape and cultural narratives.

8.1.27 Theme 27: Concerns relating to construction impacts

Careful consideration has gone into reducing any negative impact of the development on the local precinct, its residents and its users. The proponent has considered these impacts from both construction and operational perspectives. ‘

Several documents have been prepared to address potential issues relating to construction activities. These include but are not limited to:

- Construction Management Plan
- Sediment Control Plan
- Remediation Action Plan
- Construction Traffic Management Plan
- Construction Noise Management Plan

These are live documents that will be reviewed and updated throughout the design and construction processes as additional information relating to the development becomes available. It is noted that the current application is for a concept only and therefore these documents are still in early stages of development. They have been included in the application package and provide a robust understanding of how potential impacts will be mitigated to minimise disruption to neighbours including OLOLC.

In relation to construction noise management, please refer to the “updated Construction Noise and Vibration Assessment” (Appendix L) for noise mitigation strategies to be employed during construction work. The site has reasonable separation between it and neighbouring development (separation provided by Clay Cliff Creek Stormwater Channel, Gregory Place, Hambleden Cottage Reserve). It does not share adjoining walls or bound exceptionally sensitive development (medical imaging for example) There is nothing that makes this site unusual that something more than a CNVMP is needed to safeguard neighbours from construction noise.

8.1.28 Theme 28: Concerns relating to staging the development

Staging is no longer proposed as a method of delivering the project.

8.1.29 Theme 29: Concerns relating to the proposed development's noise generation

Noise emitted from the site will be required to comply with the EPA Noise Policy for Industry (or other acoustic requirement imposed by the consent authority) as considered in the updated Acoustic Assessment. This will provide appropriate protection to nearby land users.

Refer to section 5.4 of the Plan of Management (Appendix AA) to review acoustic management strategies to be followed to reduce negative impacts of noise on residents and neighbours.

8.1.30 Theme 30: Concerns have been raised relating to neighbourhood privacy being impacted by the height of the development and number of residences

The design has been reviewed and updated from a comprehensive first principles approach to analyse the site and impacts to respond to concerns around the height of buildings and privacy issues. A number of key design updates have been incorporated in order to reduce real or perceived privacy impacts to neighbourhood privacy, including:

- The building footprints have been reduced by over 1,000m² (14%), especially at Building C, to provide more publicly accessible open space across the site and a parkland setting linking Experiment Farm to Hambledon Cottage.
- Building heights have been reduced and redistributed to provide a variety of heights, appropriately scaled to their immediate context and adjacencies. Further detail addressed under Section 5.4 Built Form Strategies of the attached design report.
- A 30 metre wide open green corridor has been introduced and building height impacting the childcare centre has been reduced based on solar studies.
- This reduction, along with the use of non-accessible green roof tops, building separations and vegetated buffers, ensures a balanced privacy outcome for childcare, OLOLC and current and future residents.
- The built form is stepped down adjacent to OLOLC, considering light and privacy for OLOLC and Young Academics Early Learning Centre - Harris Park. The upper level south facing apartments have been appropriately set back from OLOLC and the Young Academics Early Learning Centre - Harris Park, with the detailed design ensuring that the spatial and orientation considers this sensitive interface. Further detail can be referred to in 4.7 Safety and Privacy and 5.4 Built Form Strategies.
- The updated design respects the historical significance of the area, particularly the heritage items such as Hambledon Cottage and Experiment Farm, by increasing setbacks, reducing building heights and integrating landscape elements that enhance the visual and cultural experience.

Further, during detailed design, it is proposed to incorporate Heavy plant screening on the southern border of the site, will ensure the privacy and separation of the Our Lady of Lebanon Co-Cathedral and surrounding area. While this screening will be placed in the interests of privacy, its height will be maintained in order to mitigate overshadowing the Co-Cathedral and adjacent childcare centre. Refer to the Social Impact assessment prepared by Forward Thinking for additional detail.

Finally, in terms of acoustic privacy, reference is made to section 6.2 of the updated acoustic assessment. The standard EPA regulations will provide appropriate acoustic protection to nearby land users.

8.1.31 Theme 31: Requests that Clay Cliff Creek be correctly located, interpreted, and the current channel remediated and reinstated as a natural water course

Prior to any consideration of connecting Country with the Clay Cliff Creek stormwater channel, it is important to again clarify its context to the site and history. Clay Cliff Creek Is not a natural asset. It is man-made.

The river valley landscape around the site has shifted and changed over thousands of years in relation to wider global climate changes. Around the time of European colonisation of the site, what is now the channelised Clay Cliff Creek stormwater channel was a chain of ephemeral freshwater ponds. As described in the 2025 Aboriginal Cultural Heritage Assessment Report prepared by Dominic Steele Consulting Archaeology:

Before the colonisation, watercourses were discontinuous chains of ponds and wetlands that relied on heavy rain to overflow the ponds and join them into a stream. The ponds drought-proofed the land by keeping water available for plants, animals and people. Settler activity disrupted this by draining the wetlands, clearing vegetation, grazing sheep and cattle and introducing rabbits. These activities caused rain to bite into watercourses, converting the chains of ponds into continuous streams in incised channels up to 15 metres deep, with water draining quickly away.

It is likely the landscape between Clay Cliff Creek and the Parramatta River had uneven and low-lying surface topography that features chain of ponds drainage and swampy meadows formation vegetation and ecologies. ²⁰⁰

The access to fresh water that would have made it a suitable location for the establishment of the early colonial agricultural projects in the area would also have made it a valuable place for Burramattagul people pre colonisation. The historic chain of ponds was replaced by a new stormwater channel, removing traces of the pre-colonial life on Country. For this reason, the Statement of Heritage Impact, and other reports, refer to this watercourse as a ‘stormwater Channel’.

8.1.32 Theme 32: Concerns were raised that demolition would result in the area being exposed to contaminated materials

Management during the demolition and carried through into the construction phase has been considered in Appendix Z, Construction Management Plan. The proposal is for concept only, and does not include any development, demolition, or construction. The community will be further consulted on construction proposals, and the Construction Management Plan, which is a live document will be updated to reflect the detail of construction, potential impacts to the area and mitigation measures.

In terms of contaminated materials, it is noted that concerns were raised about how remediation and demolition would occur in relation to structures that contain hazardous materials. A Phase 2 Contamination Investigation and Remediation Action Plan supported the EIS application and were included with the exhibition material. The Contamination response letter, included at Appendix Q notes that “it is a requirement under the Work Health and Safety Act 2011 (NSW) and the Work Health and Safety Regulation 2017 (NSW) that hazardous building materials including asbestos must be removed and managed appropriately before any demolition of buildings or structures occurs. Contamination of ground surfaces and soil caused by inappropriate demolition practices would not occur under existing controls and legislation of managing hazardous asbestos building materials”.

8.1.33 Theme 33: Does not comply with Parramatta planning controls

The proposal is legally and strategically compliant with the planning framework that applies to the subject site. Assertions that the proposal does not comply with the Parramatta Local Environmental Plan (PLEP) fail to account for the statutory operation of Housing SEPP, the lawful issue and operation of a SCC, and the availability of a clause 4.6 variation under the PLEP to support height exceedance. Each of these mechanisms provides a valid legal and planning pathway through which the proposal achieves permissibility, consistency and compliance.

1. Housing SEPP – permissibility and strategic basis

The proposal is lodged pursuant to *division 5 of Chapter 2* of the Housing SEPP 2021. Under clause 39(1), a development application may be made for the purposes of a residential flat building on land for which an SCC has been issued. An SCC was issued for the site on 19 July 2017, and remains valid under clause 39(10) of the SEPP until the application is determined. The certificate provides the strategic gateway to assess the proposal under the Housing SEPP, including its built form and compatibility benchmarks.¹⁵¹

The Housing SEPP provides the permissibility of the residential use on the E4 General Industrial land. The certificate confirms that the proposed residential development is compatible with surrounding uses, and the current proposal builds upon this with a significantly improved design response that addresses built form, amenity, landscape and heritage interface outcomes in a way that strengthens that strategic compatibility.

2. Parramatta Local Environmental Plan – development standards and savings provision

Due to the timing of lodgement, the application is assessed against the *Parramatta LEP 2011*, not the recently commenced *Parramatta LEP 2023*. Clause 1.8A of the PLEP 2023 operates as a savings provision, mandating that any development application lodged before the commencement of the 2023 Plan must be determined as if that Plan had not commenced.¹⁵¹ Therefore, the relevant development standards, including clause 4.3 for height and clause 4.4 for floor space ratio, are those contained in the 2011 Plan.

The proposal does not comply numerically with the height of buildings development standard in clause 4.3. However, a comprehensive *clause 4.6 variation request*¹⁵¹, has been submitted and rigorously justified, demonstrating that compliance with the 9.2-metre height limit is unreasonable and unnecessary, and that there are sufficient environmental planning grounds to justify the variation.

3. Clause 4.6 variation – justification and public interest

The clause 4.6 request demonstrates that the proposed height delivers a superior planning outcome in comparison to a numerically compliant scheme. Specifically:

- The height is essential to achieve the yield required to support affordable and inclusive housing outcomes, consistent with State housing policy and economic viability analysis.
- The built form has been designed to transition sensitively to the adjoining Our Lady of Lebanon Co-Cathedral and historic cottages, with clear setbacks, massing reduction and solar compatibility modelling included in the design analysis.
- Visual and heritage impact assessments confirm that the proposed height is compatible with key view corridors and enhances the setting of heritage items by removing the visually and functionally intrusive industrial building.

- The variation is consistent with the objectives of the height standard and the zone, and aligns with the broader urban design and sustainability outcomes sought under the Housing SEPP and EP&A Act.¹⁵¹

4. Development Control Plan – policy guidance not binding

While *Parramatta Development Control Plan (DCP) 2011* and later draft iterations provide relevant urban design guidance, they do not contain statutory development standards and cannot prohibit development that is otherwise permitted under an LEP or SEPP.

The relevant statutory provision confirming that Development Control Plans (DCPs) do not apply to SSD is found in clause 11 of the *State Environmental Planning Policy (Planning Systems) 2021*. Specifically, clause 11(1) states:

“Development control plans do not apply to State significant development.”

This clause operates to exclude the application of any DCP—including the *Parramatta DCP 2011* or any later drafts—when assessing SSD applications, such as the proposal for 2A Gregory Place.

Accordingly, while the *Parramatta DCP* provides useful design guidance and context, it cannot impose mandatory development controls in this assessment. Further, Section 4.15(3A) of the *EP&A Act* reinforces that a consent authority must be flexible in applying DCP provisions and must not give them determinative weight where compliance with higher-order instruments (such as the LEP or SEPP) has been demonstrated.

In this case, the proposed development has been subject to detailed design refinement, as evidenced by the consolidated design report prepared by Tzannes, the Visual Impact Assessment, and the Statement of Heritage Impact. These documents collectively confirm that key matters addressed by the DCP—such as setbacks, building form, solar access, streetscape, and landscape treatment—have been thoroughly resolved through an iterative and expert-led design process. Therefore, while the DCP has informed design resolution, it cannot—and does not—prevent the approval of a permissible SSD development under the Housing SEPP and EP&A Act.

5. Regional Plan – alignment with strategic planning objectives

The proposal is strongly aligned with the *Central City District Plan* and the *Western City and Aerotropolis Strategic Plan*, which prioritise increased housing supply, urban renewal, and integration with infrastructure. The site is within the *Parramatta CBD influence area*, a key location for housing intensification and mixed urban outcomes. The development provides significant affordable housing and is compatible with surrounding land uses, thereby contributing to the objectives of the *Region Plan* under section 3.3 of the *EP&A Act*.

6. Compatibility and public benefit

As expanded in heading 3. *Assessing Compatibility in the context of Contemporary housing need*, the proposal is demonstrably compatible with its context from a social, environmental, urban and heritage perspective-2023-0117. The compatibility assessment model Figure 1 applies a rigorous, transparent, and multidisciplinary framework to determine compatibility across statutory and strategic dimensions. The resulting conclusion is clear: the scheme is not only legally permissible, but socially and environmentally desirable, offering a net uplift in amenity, heritage appreciation, housing diversity and place quality.

8.1.34 Theme 34: The clause 4.6 request does not appropriately address the height increase. Percentage increase description to be the percentage of limit not percentage of proposal

A revised cl4.6 variation request has been provided at Appendix C.

8.1.35 Theme 35: SCC does not confer a height increase

A SCC issued under division 5 of part 2 of the Housing SEPP does not, in and of itself, authorise an exceedance of development standards such as building height or floor space ratio (FSR). However, a correct understanding of the legal framework confirms that such development *can* be approved, including where it exceeds LEP standards, where justified under clause 4.6 of the Parramatta Local Environmental Plan 2011 (PLEP), read in light of division 5 of the Housing SEPP.

The legal advice prepared by Senior Counsel is unequivocal in this respect. At paragraph 9(a)–(b), Lazarus SC and Doyle advise that a residential flat building described in an SCC may lawfully be approved notwithstanding non-compliance with LEP development standards (including height), provided that a written request under clause 4.6 is made and the consent authority is satisfied the applicant has adequately addressed the matters in clause 4.6(3). In such instances, subclause 4.6(4)(a)(ii) must be *read down*—that is, interpreted so as not to obstruct approval—where development is otherwise authorised under the Housing SEPP:

“That is so because any provision of an LEP that would have the effect of prohibiting that form of development would be inconsistent with the directive in s 38(1) of the Housing SEPP which provides that: ‘Development to which [division 5] applies may be carried out with consent’.”

This approach is supported by the statutory presumption of hierarchy in section 3.28(1)(a) of the EP&A Act, which affirms that a State Environmental Planning Policy prevails over a local environmental plan in the event of inconsistency. Clause 8 of the Housing SEPP reiterates this statutory principle:

“Unless otherwise specified in this Policy, if there is an inconsistency between this Policy and another environmental planning instrument... this Policy prevails to the extent of the inconsistency.”

In practice, this means that the requirement in clause 4.6(4)(a)(ii)—which compels consistency with the zone objectives—must be interpreted purposively in the context of a division 5 development. As noted at paragraph 52 of the legal advice, the clause should be read in a way that allows the development to proceed where it is otherwise permitted under the Housing SEPP, even where the form of development is prohibited in the zone:

“... that requirement should be read down to permit the development as anticipated by division 5.”

This interpretative approach is consistent with case law including *Hastings Point Progress Association Inc v Tweed Shire Council* [2009] NSWCA 285, in which the Court of Appeal held that where a SEPP permits development despite other instruments, the SEPP must prevail.

Therefore, while the SCC does not confer a new height entitlement, it does enable the consideration and approval of a scheme that exceeds mapped height controls—provided this is appropriately justified through a clause 4.6 variation. The accompanying clause 4.6 request submitted with this application addresses the relevant matters in full and is grounded in the strategic and public interest imperatives of the Housing SEPP.

Finally, the height and FSR exceedances sought under the current proposal reflect the form and scale that has already been assessed by the Planning Secretary as *compatible* under the SCC. As such, the

development seeks consent for the same built form that was endorsed at the strategic gateway stage of the division 5 process.

8.1.36 Theme 36: The SCC is no longer valid

The proposal is lodged pursuant to *division 5 of Chapter 2* of the Housing SEPP 2021. Under clause 39(1), a development application may be made for the purposes of a residential flat building on land for which an SCC has been issued. An SCC was issued for the site on 19 July 2017, and remains valid under clause 39(10) of the SEPP until the application is determined. The certificate provides the strategic gateway to assess the proposal under the Housing SEPP, including its built form and compatibility benchmarks.¹⁵¹

8.1.37 Theme 37: The site should be in public ownership and converted to a park

The site is not zoned for public recreation, nor have there been attempts to purchase the site and convert it to a park by any Public Authorities. The proponent purchased the site from the open market, and at that time the Public Authorities had an opportunity to purchase the site.

The updated Statement of Heritage Impact identifies that in the late 1990s, the site was offered for sale but the previous owners to council however council refused to buy it, likely due to financial reasons.

The site is currently zoned for industrial purposes and contains a decaying industrial building that is not accessible to the public. The site is subject to a SCC for residential purposes supporting 50% affordable housing. The concept seeks to deliver significant amount of publicly accessible open space at ground level, permeability, through site links and walkways as part of the concept and future redevelopment. The permeability and open space is achievable as part of the site's redevelopment for much needed housing in the area.

8.1.38 Theme 38: Concerns re-impacts Our Lady Aged Care (OLACC) residents

The Transport and Accessibility Impact Assessment by SCT Consulting concludes that the assessment is satisfied that the proposed development is not expected to significantly worsen traffic congestion at key intersections surrounding the site, and its impacts would be lower than if the site continued to operate or was redeveloped for industrial use. additionally, the proposed parking provision complies with relevant requirements and will accommodate all parking demand within the site. It is considered appropriate based on the parking demand analysis and car ownership pattern in the area. The proposal will not adversely impact the supply of on-street parking in the area and not represent an oversupply of parking spaces.

Noise emitted from the site will be required to comply with the EPA Noise Policy for Industry (or other acoustic requirement imposed by the consent authority). This will provide adequate protection to nearby land users. Noise emission limits imposed in the EPA guidelines are set considering the nature of the nearby land use. Specifically, noise emission limits consider that there is an Aged Care Facility in the vicinity.

The design report in section 7.4.3 views from the sun diagrams identifies that the aged care building isn't impacted by overshadowing until approximately 3pm. Also refer to section 2.5 of the Tzannes VIA (appendix E). This section provides detailed discussion relating to views of OLOLC and the impacts to views from it and toward it.

The proposal also seeks to deliver positive impacts by delivering a significant amount of publicly accessible open space at ground level, permeability, through site links and walkways as part of the

concept and future redevelopment. The permeability and open space is achievable as part of the site's redevelopment for much needed housing in the area.

8.1.39 Theme 39: The proposal will generate an increased demand for recreation spaces

Directly responding to the feedback received in 2022, the updated Concept Plan increases the amount of recreation space currently available in Harris Park.

Accessibility to open, green space was the most important issue for survey respondents. In terms of changes to the proposal, the top two responses rated in the survey as 'somewhat or very important' were: increased pedestrian and cycle networks (n=15), and increased landscaping (n=13). (See the updated Community and Stakeholder Engagement Report, July 2025.)

The updated Concept Plan responds directly to this priority with a design approach integrating the built form into a parkland setting. This includes replacing the current disused, inaccessible factory site with housing in 16,343 sqm of landscaped grounds. The updated Concept Plan includes the creation of new parks, pedestrian and cyclist passages and accessways.

As part of the parkland setting, the rehabilitation of Clay Cliff Creek with native grasses and reeds and a creek walk will further enhance the opportunities for passive and active recreation that are currently not offered. The residences are set back at a minimum of 6 meters from the channel, opening onto a series of public and private communal open spaces.

The updated Concept Plan focuses on three built zones each with a distinct identity, reflecting their location on the site. The central zone is called the Community Zone, which would be open to the public, as well as residents, and designed for passive and active recreation.

The updated Concept Plan is supported by research that shows that the provision of communal areas and spaces can increase the frequency and quality of social interaction, promoting community participation at the level of both buildings and neighbourhoods. Social interaction can be influenced by design strategies that provide opportunities for low-intensity and informal contact and natural environments have been linked with various social, psychological and health benefits.

8.1.40 Theme 40: The proposal will generate an increased demand for services

The purpose of the project is to ensure that people with low-to-medium incomes in Western Sydney have the opportunity to access low-cost rental housing where there are also growing employment opportunities and excellent proximity to transport and other services.

The Social Infrastructure Audit in the updated SIA (July 2025)

(section 4.5) established that the site is exceptionally well located in terms of walkable access to a myriad of both private and public services. These include several public transport options, open space, health and education services and the full range of commercial and retail opportunities typical of a major centre.

Transport services

Public transport is expected to be the most common mode of transport among future residents, sharing 55 per cent of the modal split. Private vehicle mode share is predicted to be about 35 per cent, including both drivers and passengers. Walking and cycling will cover 10 per cent.

With the location of the development being close to existing amenities and services, walking is expected to be an attractive transport mode. The routing analysis shows that the existing walking infrastructure between the development and other destinations is adequate to ensure pedestrian comfort and safety.

The development will encourage the use of cycling through the provision of 353 bicycle parking spaces located in a convenient location. However, the existing bicycle network is limited. Hence, the delivery of the Parramatta Bike Plan 2024 will be crucial in capitalising on the development location to encourage cycling as an alternative mode of transport.

Heavy rail

Parramatta Station connects to locations all around metropolitan Sydney. It's a 30-minute ride from Sydney's Town Hall to Parramatta. There are stations at nearby Harris Park and Westmead.

Sydney Metro West

Since commencement in early 2022, this project will extend Sydney's metro services connecting Parramatta and Westmead to Sydney CBD via Sydney Olympic Park, North Strathfield, Burwood North, Five Dock, and The Bays.

Light Rail

Parramatta Light Rail Stage 1, the L4 Westmead & Carlingford Line, opened in December 2024.

The 12-kilometre network provides connections to key destinations, including the Westmead Health Precinct, CommBank Stadium and Riverside Theatres with 16 accessible stops.

The L4 line will launch to a weekday timetable, with initial services every 9 minutes between 7am to 7pm; every 12 minutes between 5am and 7am and 7pm and 11pm; and every 16 minutes between 11pm to 1am.

Parramatta Light Rail Stage 2 will connect Stage 1 and the Parramatta CBD to Sydney Olympic Park via Camellia, Rydalmere, Ermington, Melrose Park and Wentworth Point.

Buses

The interchange near Parramatta Station is the start of bus routes that connect Parramatta with other Sydney destinations like Castle Hill, Hornsby, Ryde, Strathfield and the Sydney city centre.

Ferries

Known as the Parramatta RiverCat, the F3 Parramatta River ferry service travels from Parramatta Wharf to Circular Quay.

Health care services

The Parramatta area is well serviced with community, primary and tertiary health services.

Patients in the Parramatta area are referred to Westmead, Cumberland, Auburn and Concord Repatriation Hospitals. Additionally, there are a myriad of community health centres, GP clinics, specialised medical centres and a range of allied health, dental and other services in Parramatta and in Harris Park.

As well as significant throughput of services, the health system is a major employer. More council residents worked in health care and social assistance than any other industry in 2021.

Westmead Innovation Precinct

Already Australia’s largest health services precinct, Westmead offers world-class integrated tertiary clinical care, an innovative education and research network, hundreds of private health businesses and the globally connected Westmead Institute for Medical Research and Children’s Medical Research Institute.

More than \$3 billion has been committed by government, universities and the private sector to realise the vision of an integrated and innovative health, commercial, education and research precinct. By 2036, this will support 20,000 tertiary students and 50,000 full time staff.

Community facilities

The site is well-located for community facilities, such as education, religious and recreational opportunities, including parks, gardens and other green spaces.

Community facilities and recreational opportunities near the site are mapped as follows:

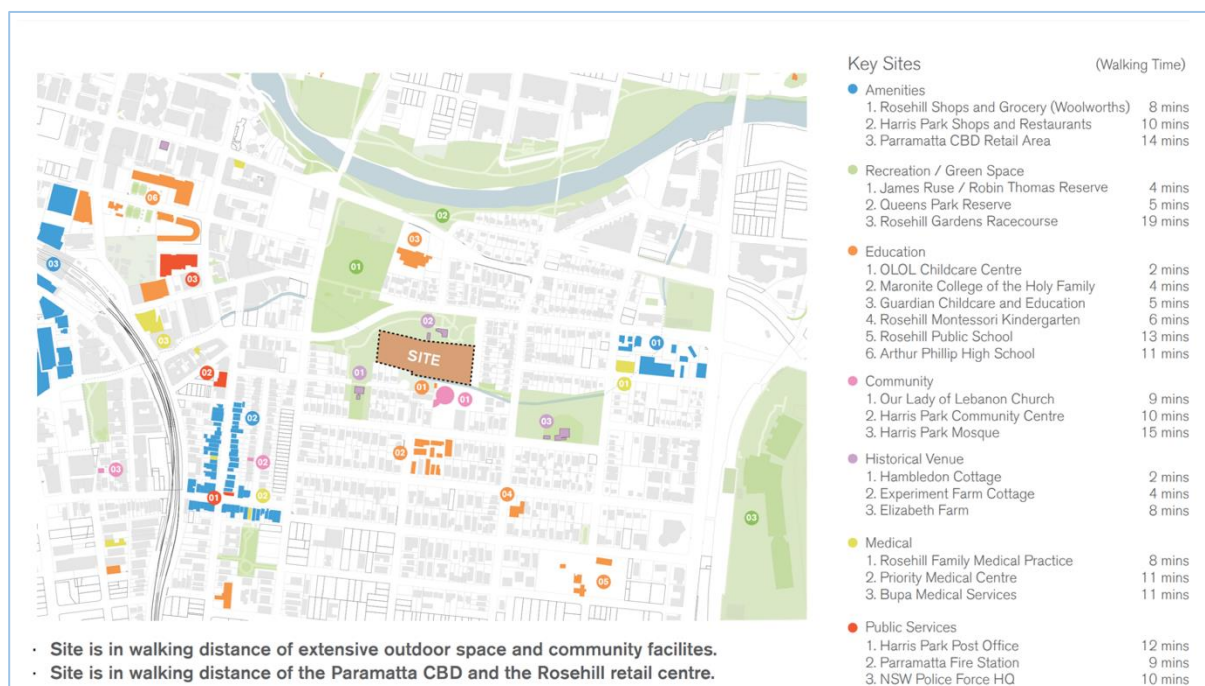


Figure 30 Community facilities and recreational opportunities

8.1.41 Theme 41: The proposal will lead to the destruction of cultural values

Refer to the updated Statement of Heritage Impact, sub-sections 7.1 and 7.2.

The updated proposed development will provide an opportunity to connect with and regenerate Country. The updated proposed development is founded on First Nations values, engagement, and place analysis. By incorporating First Nations values and engagement, the updated proposed development will add a new pre-Colonial interpretative context to the Harris Park precinct and the heritage listed items in the locality, which is currently lacking. The updated proposed development will enhance the existing cultural significance of the precinct by retaining and integrating pre-Colonial and contemporary multi-cultural design elements within an evolved historic cultural landscape.

8.1.42 Theme 42: The proposal will lead to the destruction of social values

Refer to the updated SIA report at Appendix X.

State-significant projects can affect people in many ways, both positively and negatively. Identifying and understanding social impacts helps inform responses that aim to avoid, mitigate, or reduce negative

impacts and enhance positive impacts. ‘Social impacts’ generally refer to the consequences people experience when a new project brings change.

The SIA identifies, predicts, and evaluates likely social impacts arising from a project and propose responses to the predicted impacts. As illustrated below, the SIA assesses this project from the perspectives of people, which means developments are more likely to be socially sustainable.



Figure 31 SIA model

Based on the evidence collated for the updated SIA and the associated community and stakeholder engagement process, including assessment of previous engagement outcomes, the following anticipated social impacts have been identified as resulting from the proposal.

The mitigation measures are aimed at minimising negative impacts and maximising positive impacts throughout the stages of the proposal.

Following is a summary of the social impacts and benefits and mitigations for the updated Concept Plan. The individual elements have been evaluated these individual impacts in terms of:

- The likelihood of the impact occurring
- The characteristics of the impact
- The magnitude of the impact.

Table 15 Social impacts analysis and mitigation

Social impact or benefit	Likelihood level and magnitude	Assessed impact significance amended Concept Plan	Response mitigation
Way of Life and surroundings			

Heritage impact on three state heritage registered items	High	Medium positive	Significant changes to the proposal following 2022 engagement, including: Reduction in bulk, scale, and height Significantly increased setbacks, particularly buildings on the northern and southern sides of the site A total landscaped area of 16,343 sqm to create a seamless integration with surrounding parkland and creating new parks, pedestrian and cyclist passages and accessways, and view corridors The site layout will be porous, allowing for easy pedestrian mobility within and through the site, and a clear outlook from one side of the site to another Heavy plant screening on the southern border of the site, will ensure the privacy and separation of the Our Lady of Lebanon Co-Cathedral and surrounding area. While this screening will be placed in the interests of privacy, its height will be maintained in order to mitigate overshadowing the Co-Cathedral and adjacent childcare centre Opportunity for greater visitors from culturally diverse communities to the historical assets with the increase in local population and greater permeability of the site Increased parking providing more parking than required under the Housing SEPP's requirements.
Aboriginal heritage	High	High positive	The importance of Indigenous heritage and history to the local area is recognised locally and through engagement. Aboriginal heritage and history are key principles underpinning the updated Concept Plan. The Project's Connecting with Country Design Guide found that the area was the home of generations of Aboriginal people, providing land for social networks, economic activity such as net and tool-making sites and fire stick farming practices, and home-based activities such as cooking sites. These important historical features are reflected in the Design Guide. This proposal offers significant recognition to the Indigenous heritage of the site for the first time.
Provision of Build-to-Rent and Affordable Housing	High	High positive	Significant benefit to local area and wider region: The proposal delivers increased housing stock through build-to-rent and affordable housing provision, which will contribute to easing the housing need in the locality as well as at a broader scale of the region. Increased rental housing stock, particularly for key workers, will support the projected significant growth in employment in the Parramatta LGA with the City of Parramatta Council targeting the

			creation of 150,000 more jobs by 2050. ²⁰⁸
Management of the site - BTR and Affordable Housing	High	High positive	Research demonstrates that many of the perceived negative impacts of affordable housing depend on project design, management, and location, and are most likely where design and management are poor, where it is located in a rundown and disadvantaged area, and when affordable housing residents are clustered. In the amended Concept Plan, different tenure types will be spatially disbursed and physically indistinguishable. Potential impacts that may concern a community include antisocial behaviour, parking, privacy, overlooking, visual effects, and noise. These potential impacts can be mitigated, as further outlined in chapter 7 of this report. There is no evidence that affordable and BTR housing increases local crime activity or other social amenity impacts. Project scale, planning and design, professional and innovative asset and tenancy management, accessible open and communal spaces, social inclusion, and tenant participation are all important considerations and success factors for affordable housing projects and are ‘principles’ which underpin the updated Concept Plan.
Health and well-being			
Parkland setting	High	High positive	The project will deliver a parkland setting comprising a total landscaped area of 16,343 sqm to create a seamless integration with surrounding parkland and creating new parks, pedestrian and cyclist passages and accessways, and view corridors. The area is currently blighted with disused factories and the existing open space is hardly ever used or visited.
Pedestrian and cycleways	High	High positive	The engagement has demonstrated that there are significant positive benefits to both the local and wider communities in the passive and recreation opportunities in this proposal. The top two responses in the survey rated as somewhat or very important were: increased pedestrian and cycle networks (n=15) and increased landscaping (n=13).
Community			
Perceived incongruity with the surrounding natural and built landscapes, the height and scale of buildings. General perceptions of	High	Low negative and positive noting the locality change is significant	Responses have included a reduction of the scale of the development and increased setbacks, particularly on the borders of the OLOLC and Hambledon Cottage, and a significant increase in green space and landscaping to create a more harmonious interaction with surrounding land uses. Landscaping with advanced shrubbery will provide

²⁰⁸ City of Parramatta, *Parramatta revs up bid to be Western Sydney's jobs engine*, <https://www.cityofparramatta.nsw.gov.au/about-parramatta/news/media-release/parramatta-revs-up-bid-to-be-western-sydneys-jobs-engine>, published 5 September 2024

overdevelopment of the site, social amenity impacts on the local community, and traffic and parking impacts.			a green screen between the site and the cottage and soften the visual appearance of buildings.
Community consultation	Medium	Medium positive	The updated Concept Plan addresses views raised by the community and stakeholders in the 2022 engagement systematically. Community and stakeholder participants in the engagement on the updated Concept Plan recognised and welcomed the proponent's response to the previous consultation and acknowledge that significant changes have been made to the scheme. The three key issues through the stakeholder and community engagement are European and Aboriginal heritage, access to open, green space and traffic management. The themes related to European and Indigenous heritage, and traffic and parking management are addressed (as far as practicable) through the updated Concept Plan. In addition, there is support for the community benefits the plan will provide including open space and increased housing (encompassing built-to-rent and affordable housing).
Economic			
Economic boost and jobs	High	High positive	Increased housing stock will support the projected significant growth in employment in the Parramatta LGA with the City of Parramatta Council targeting the creation of 150,000 more jobs by 2050. ²⁰⁹
Access			
Traffic impact	Medium	Medium negative	The development will generate up to 61 vehicle trips during the AM peak hour, 48 in PM. Most traffic will travel to/from James Ruse Drive. Development's peak traffic generation times do not coincide with peak times of the church and school. Traffic impacts will be minimal on the surrounding road network during typical residential development peak hours. Under the future-year scenarios, the proposed development is not expected to create significant impacts on the operation of the key intersections surrounding the site, either when assessed with or without nearby developments. No upgrade to infrastructure is required as a result of the proposed development. Based on the above findings, the traffic assessment concludes that:

²⁰⁹ City of Parramatta, *Parramatta revs up bid to be Western Sydney's jobs engine*, <https://www.cityofparramatta.nsw.gov.au/about-parramatta/news/media-release/parramatta-revs-up-bid-to-be-western-sydneys-jobs-engine>, published 5 September 2024

			Due to its low traffic generation, the proposed development is expected to not create significant impacts on the surrounding transport network. The Alfred Street Alice Street roundabout has been found to experience congestion only during school pick-up and drop-off times. The roundabout's peak times do not coincide with the proposed development's peak traffic generation times and hence will not be exacerbated by the proposal. The proposed parking provisions comply with relevant legislation and documents. The provisions are considered appropriate based on the parking demand analysis. The proposal will not have an adverse impact on the on-street parking in the area. Servicing and loading/unloading activities will not create significant traffic impact and safety issues on either the proposed landscaped shared zone or Gregory Place.
Parking	Medium	Medium negative	The development proposes to provide a total of 386 car parking spaces, with 296 spaces allocated for residents and 90 spaces for visitors, retail uses, and car share. The provision for accessible parking has not been finalised but will be at least three spaces as required by the PDCP 2011. A total of 353 bicycle parking spaces will be provided, comprising 320 spaces for residents and 33 spaces for visitors and retail uses, which are all accessible from the B1 level. The proposal will also deliver 52 motorcycle parking spaces, 45 spaces for residents and 7 spaces for short-term users. All parking provision complies with the requirements stipulated in the Housing SEPP, the PDCP 2011, and the National Construction Code (NCC). The proposed parking equates to an average provision of 1.2 parking spaces per dwelling, lower than the previous 1.3 spaces per dwelling proposed in the original SSDA. It is also noted that while the resident car parking provided is higher than the Housing SEPP's requirements, it is still 10 per cent lower than the PDCP 2011 requirements of 330 spaces.
Public Transport	Medium	High positive	Public transport is expected to be the most common mode of transport among future residents, sharing 55 per cent of the modal split. Private vehicle mode share is predicted to be about 35 per cent, including both drivers and passengers. Walking and cycling will cover the rest of 10 per cent. With the location of the development being close to existing amenities and services, walking is

			expected to be an attractive transport mode. The routing analysis shows that the existing walking infrastructure between the development and other destinations is adequate to ensure pedestrian comfort and safety. The development will encourage the use of cycling through the provision of 353 bicycle parking spaces located in a convenient location. However, it is acknowledged that the existing bicycle network is considerably limited. Hence, the delivery of the Parramatta Bike Plan 2024 will be crucial in capitalising on the development location to encourage cycling as an alternative mode.
Decision making systems			
Ongoing management of the scheme	High	High positive	Engagement of an affordable housing provider is underway for early advice and ongoing management of BTR and Affordable Housing The affordable housing provider will establish decision-making systems in the scheme to ensure residents are actively engaged in community-building and problem resolution. Ongoing engagement with neighbouring residents will also be established to inform management of emerging issues.

For more information, refer to the *updated Social Impact Assessment* (July 2025).

8.1.43 Theme 43: The proposal will lead to the destruction of ecological values

MJD Environmental updated BDAR Waiver request at appendix GG, notes the following:

The proposal will not impact indigenous vegetation, vegetation communities or reduce important available habitat for threatened entities. The proposal will require the removal of twenty-four (24) non-endemic planted trees and shrubs, of which nineteen (19) individuals require approval for under Part 5.4 of the DCP (2011). Of the 19 individuals, four (4) are recommended for removal under Part 6 Division 4 Section 46 of the Sydney Water Act 1994 due to risks of infrastructure interference from root extents. One is required to be removed due to its proximity to an existing building. A complete list of non-endemic planted species to be impacted is listed above. The species are scattered among a dominating cover of non-native planted and self-seeded woody weed species, proliferated with a lack of maintenance. A review of OEH Bionet records within the locality was undertaken, with no records existing within the site. Records within the 10km search area were considered during the impact assessment. The non-endemic planted species to be impacted as a result of the proposal do not constitute as habitat for threatened entities beyond opportunistic foraging.

Owing to the sites position within the landscape, lack of indigenous vegetation and habitat features present within the site, impacts to threatened species or ecological communities or their habitat are unlikely to occur. The proposal will reduce connectivity through the removal of vegetation, however the majority of vegetation to be removed consist of HTE woody weed species, lacking habitat value to threatened entities within the locality. The proposal will not exacerbate fragmentation of native vegetation, nor impact important vegetation corridors.

The proposal demonstrates avoidance and minimisation actions through site planning. The proposal will avoid impacts to the majority of mature non-endemic flowering gums, including the establishment of a reserve within the south-west. Furthermore, all non-endemic planted species to

be impacted as a result of the proposal will be replaced following the construction scope of the works.

8.1.44 Theme 44: No consideration has been given to the proposal's location within an area of National heritage significance

Refer to the GBA Heritage updated Statement of Heritage Impact Section 4.

The area has been identified in Parramatta DCP but has not been formally listed on the National Heritage Register.

The original identification of a larger portion “Harris Park” as a self contained area of National Significance was first used in the maps for REP 28, as discussed in Sub-section 2.2. Harris Park of itself only gains national significance as a direct component of the whole of Parramatta historic cultural landscape. The extent of 200 years of growth and change would make the long term management of a blanket listing extremely difficult.

This degree of significance for the cottages can no longer be considered for the remainder of Harris Park, given the extent of 20th and 21st century development. The cottages only gain the full extent of any national significance, not from their creation and survival but in their larger historic context as an important part of the early European settlement of Parramatta. Therefore, the context of the three cottages cannot be considered of ‘National Significance’.

8.1.45 Theme 45: The development will impact on the cultural and tourism potential of the listed cottages and should elevate the tourism significance

Refer to the GBA Heritage updated Statement of Heritage Impact Section 7.1.

The proposed landscaped through-site links and potential bridge crossings of the channel will create a publicly accessible, pedestrian network, allowing new and enhanced views and connections to adjacent buildings and the wider precinct, elevating the tourism significance of the Harris Park precinct.

The updated proposed development provides a north-south route through the site, linking Hambledon Cottage to the channel walk, enabling the interpretation and appreciation of the cottage by the residents and the wider community group, and thus will contribute to and enhance its tourism potential.

The updated proposed development will provide park precinct on both sides of the channel and will create a pedestrian walk along the stormwater channel. The proposed walkway along the channel with integration of public art and installation of interpretive elements, will provide an attractive new direct pedestrian connection between Experiment Farm and Elizabeth Farm, contributing to and enhancing their tourism significance.

Practically, the updated proposal incorporates amenities which would enhance the offering of the surrounding area, especially those visiting Hambledon Cottage, with the provision of small retail such as a café.

Theme 46: Current industrial factories do not impact the surrounding area

This is partially correct. The site is currently unoccupied and therefore has no impact on the surrounding area. Should the site be operating under its approvals, there would be acoustic, traffic and odour impacts.

Historical operational noise reports for the site when operated as a factory (Wilkinson Murray Report 4/11/1986) which identified noise levels of 48-49dB(A) at the residences nearest the site (Gregory Place),

which is far louder than when the allowable noise emissions will be if applying current EPA guidelines (38dB(A). Please refer to section 5.4 of the updated acoustic assessment.

The Transport and Accessibility Impact Assessment concludes that the proposed development is not expected to significantly worsen traffic congestion at key intersections surrounding the site, and its impacts would be lower than if the site continued to operate or was redeveloped for industrial use.

8.1.46 Theme 46: The removal of existing industrial on the site is supported

The redevelopment of industrial land at Gregory Place provides an opportunity to deliver rental housing (50% of which is affordable) in a landscape setting to a high standard and create a new place in Parramatta that better connects the parklands, community facilities, heritage significant buildings and pedestrian network to the betterment of amenity within the wider precinct.

The proposal is founded on First Nations values, engagement and place analysis. The co-design process shared by Yerrabingin and Tzannes, providing a sustainable deliver of new housing, establishes a pre-colonial interpretative layer for the proposal adding a new context to Hambledon Cottage and other heritage items in the wider precinct.

For residents the updated proposal establishes an improved foundation from what was previously lodged and exhibited for a cohesive and attractive neighbourhood with distinctive attributes. Residents will have opportunity to live in well-designed apartments in a community environment that has prospect of engendering a sense of pride and belonging. The affordable housing infrastructure is characterised by a breathing, living environment set within parklands with a rich cultural history that is responsive to solar amenity and excellent light, air and outlook.

The existing cultural significance of the precinct will be enhanced by the integration of pre-colonial and contemporary multi-cultural design elements integrated with the existing, highly significant, colonial buildings. The changes strengthen the interpretative potential of the precinct by more effectively demonstrating the evolution of the proposal over millennia into its current incarnation as new affordable housing infrastructure. The proposal is for a special sub-precinct defined at the boundaries by connecting parklands to the north and south around a re-imagined stormwater channel and a landscaped Shared Zone to address on grade vehicular access.

The open space network and landscape design balances the interpretation of colonial history with pre-colonial and contemporary multi-cultural design elements, enriching the park experience. The shared way ensures a dominant landscape setting for Hambledon Cottage, separating park uses from the principle on grade address of the new residential neighbourhood.

The industrial infrastructure adjacent to the parklands has been replaced by affordable housing infrastructure designed to rejuvenate the wider precinct. The proposal offers excellent interior amenity balancing the benefits of increased density to deliver more socially sustainable outcomes delivered by the private sector.

The implementation of this proposal contributes to the amelioration of the impacts of urban sprawl and provides the optimum adaptive re-use of brownfield land as a new residential neighbourhood with rental housing (50% of which will be affordable) infrastructure designed to a 100-year life for culturally diverse residents.

8.1.47 Theme 47: The site is a good location for factories for jobs

As noted above, reinstating industrial uses on the site would likely reduce the amenity of surrounding residential areas due to increased noise, odour and vibration resulting from industrial activities.

Further, opportunities to provide publicly accessible open space, permeability, and through site links as part of the redevelopment of the site would be lost, and the site would remain closed off to the community and continue to act as a barrier.

8.1.48 Theme 48: Support of residential use over industrial use

The location of the site as an isolated industrially zoned parcel of land presents interface impacts with the existing industrial use. The transition of the site to residential is an appropriate outcome considering its setting. Residential is supported by the local strategic planning framework, and supports the opportunity for housing, affordable housing and open space.

8.1.49 Theme 49: Alternative development not adequately considered

This report and its supporting Appendices provide a further iterative detailed review of the Gregory Place urban renewal development scheme. The design report confirms that Section 1.3—titled *Project Evolution and Testing of Options*—explicitly documents the iterative exploration and assessment of alternative development forms for the site .

This section outlines that the proposal has undergone a multi-year refinement process, including formal urban design testing, feedback from the Department of Planning, Heritage NSW, and Parramatta Council, and responses to public submissions. Notably, the exhibited scheme presented in 2022 has been revised based on that feedback to deliver improved environmental, heritage and amenity outcomes.

Key options that were tested include:

- An earlier 24–25 metre-high industrial built form with intrusive massing and limited permeability, which was found to exacerbate adverse heritage and visual impacts, particularly in relation to Hambledon Cottage.
- A lower-scale but bulkier perimeter building design that, although technically lower in height, increased visual mass, overshadowing, and streetscape intrusion. This was ultimately not pursued as it failed to deliver landscape setbacks, permeability, or solar benefits.
- A reduced density option that was rejected due to poor yield, limited social and affordable housing delivery, and poor built form efficiency. The economic and social analyses confirmed such an option would undermine viability and affordability outcomes .

The current scheme was selected as the preferred outcome after applying the compatibility matrix model (Figure 5), which balances built form performance, amenity, and strategic land use alignment. The selection of this preferred scheme reflects its superior performance in:

- Solar access and overshadowing performance.
- Heritage integration and improved view corridors.
- Significant setbacks and deep soil landscaping.
- Reduced visual bulk at sensitive interfaces, particularly near the Cathedral.
- Alignment with Housing SEPP objectives and site-specific compatibility.

In summary, the project team has undertaken a detailed, transparent and design-led evaluation of development alternatives. The current concept represents the outcome of a rigorous and responsive

design process and reflects the most compatible, sustainable and equitable development form for the site.

8.1.50 Theme 50: Proposal is overdevelopment

The proposal is not considered overdevelopment. It replaces disused industrial infrastructure with affordable housing embedded in a parkland setting. The design integrates heritage, landscape and First Nations principles, and delivers:

- 64% open space, with the majority publicly accessible.
- Enhanced connectivity between heritage items and surrounding neighbourhoods.
- A socially inclusive, environmentally responsive and economically viable residential precinct.

The development aligns with the evolving urban character of Parramatta and Gregory Place and contributes positively to the precinct's renewal. Refer to design report section 2.3 Site Compatibility and 3. *Assessing Compatibility in the context of Contemporary housing need* In this report.

8.1.51 Theme 51: The development is illegal

The consent authority will undertake a merit based assessment of the proposal, and make its determination within the framework and statutory power of the Environmental Planning and Assessment Act.

8.1.52 Theme 52: Build-to-rent is virtue signalling

This proposal is for a build-to-rent housing development under State Environmental Planning Policy (Affordable Rental Housing) 2009.

Housing stress is a significant issue in the Parramatta LGA, particularly for people who rent, due to comparatively low incomes, very low rental vacancy rates and high housing costs. The most affected group by Sydney's housing shortage are key workers, such as health workers, trades, police, teachers, personal service workers and cleaners.

Key workers are a significant proportion of the Parramatta and Harris Park workforce. The key policy driver for Build-to-Rent is to ensure that key workers are not forced out of metropolitan areas, which would have medium- and long-term adverse consequences to the very functioning of the City.

Rental tenancy in Harris Park is higher than both Parramatta LGA and NSW, comprising 85 percent of occupied dwellings, while the remainder is either outright ownership or with a mortgage (or not stated). These figures indicate an existing demand for rental properties in the area, as well as an implied demand for more similar dwelling types as the population grows.

There is a very low rental vacancy rate and a high proportion of the community is in housing stress. The need in the area is severe with a rental vacancy rate below 3%, which is considered to be a locality in housing stress.

The economics report by Pacific Economics and Sustainability shows that rental vacancies in the 2150 postcode (Parramatta and Harris Park) dropped to 1.7 per cent in February 2025, with only 191 vacant properties available. This is down from (a still very low) 281 in December 2024.

The number of vacancies has been below 200 since the June quarter 2022 (except for a one-off in the December quarter 2024). Rents rose from \$646 in March 2024 to \$700 in February 2025 – an 8.4 per cent

increase through the year. In the three years between March 2022 and March 2025, rents have risen by 75.4 per cent, reflecting the undersupply of housing in the 2150 area.

In the week of 9 March 2025, there were only 103 listed rental properties in the 2150 postcode. The least rent a household would pay for a two-bedroom unit in postcode 2150 was \$500. For a household earning between \$80,000 and \$90,000, there were only 3 listings available in the whole area.

The units within the site will be provided for rent for no less than 15 years. In addition, 50% of the units will be made available for affordable housing through a Community Housing Provider.

Governments at all levels of government are prioritising funding towards new housing supply, and the build-to-rent model is well-established in overseas markets and is increasingly part of Australia's housing supply mix.

In 2021 the Department of Planning and Environment released *Housing 2041* (the Housing Strategy), a 20-year vision and strategy to meet housing needs in NSW. The new Housing SEPP supports this strategy by driving the development of affordable and diverse housing to meet the needs of the State's growing community by giving incentives to supply affordable and diverse housing in the right places and for every stage of life.

The Housing Strategy and SEPP define build-to-rent as large-scale, purpose-built rental housing that is held in single ownership and professionally managed.

The build-to-rent housing provisions are:

- Each tenant must be provided a range of lease term choices, including a genuine option to enter into a fixed-term lease of at least three years
- Build-to-rent dwellings must be made available to the general public, without restriction, apart from restrictions necessary to ensure public health and safety, to promote announced government policy, or to ensure dwellings designated for affordable or social housing are used for that purpose
- The dwellings and common land that comprise the build-to-rent property must be held within a unified ownership structure
- The dwellings that comprise the build-to-rent property must be managed by a single management entity, with on-site access to management for tenants.

Benefits of build-to-rent housing

Build-to-rent housing has the potential to provide long lasting community benefits, with greater housing choice for tenants who would have access to high-quality dwellings, in a stable rental environment. Increased rental security may also have wider social and economic benefits, with tenants better able to establish themselves in a community.

The single ownership of these developments, coupled with the ongoing stable returns derived from consistent rental income, means that greater security of tenure is provided as the owner seeks to retain tenants for as long as possible.

Build-to-rent can provide large-scale housing developments in locations such as this, which is accessible to jobs, schools, amenities and services. Well-connected communities in locations which are close to transport and strategic centres provide excellent opportunities for individuals and families to thrive.

While BTR is not a complete solution to fixing housing affordability, it can allow for people to live in desirable locations where they ordinarily would not be able to afford a mortgage, in particular, the deposit required to secure a mortgage.

Social inclusion

Socially inclusive housing is located in sites like Gregory Place that provide residents with good access to transport as well as local amenities and services. It will also provide residents with a voice in decisions that affect their own lives, such as concerning the management of their homes.

The inclusive nature of build-to-rent will provide residents with opportunities for positive social connections and interactions across cultural and socioeconomic differences. Being socially and economically connected means, among other things, enjoying access to jobs, services, and social networks.

For more information, refer to the updated SIA (July 2025).

8.1.53 Theme 53: The proposal does not benefit the local community

At present, the site is underutilised, unsightly, and in need of redevelopment. Given its size and location, the site has the potential to contribute to the social, strategic, and land use planning objectives of the local community and the region more broadly.

The updated Concept Plan prioritises benefits to the local community. These benefits have been shaped by community and stakeholder input through the 2022 engagement and the submissions.

There is a very low rental vacancy rate and a high proportion of the community is in housing stress. The need in the area is severe with a rental vacancy rate below 3%, which is considered to be a locality in housing stress.

The proposal contributes to broader local and state government strategic priorities for housing diversity, accessibility and affordability in close proximity to essential services and job opportunities.

The long-term benefits of the proposal for the local community are associated with the wider community benefit of providing rental accommodation and affordable rental, particularly for key workers such as health workers, trades, police, teachers, personal service workers and cleaners.

This significant increase in rental housing stock will support key workers to live in a well serviced location, where there is a significant shortage of rental housing stock and affordability pressures. They will have increased security of tenure, opportunities to participate in the management of the housing and the opportunities to move within the development as their housing needs change, which will facilitate community cohesion and connection to the local community.

Increased housing stock will also bring additional professional and skilled workers to the area and support the projected significant growth in employment in the Parramatta LGA with the City of Parramatta Council targeting the creation of 150,000 more jobs by 2050.²¹⁰

Notably, the community and stakeholder engagement outcomes demonstrated support for the positive benefits of build-to-rent and affordable housing.

²¹⁰ City of Parramatta, *Parramatta revs up bid to be Western Sydney's jobs engine*, <https://www.cityofparramatta.nsw.gov.au/about-parramatta/news/media-release/parramatta-revs-up-bid-to-be-western-sydneys-jobs-engine>, published 5 September 2024



Figure 32 Interface with Hambleton Cottage view to west

There will also be benefits for the local community through the renewal of a valued heritage locality, as well as potential benefits for the historical assets with the increased population and flow-on in visitor numbers. Despite their significance to Parramatta's history, visitor numbers to Hambledon Cottage and Experiment Farm are low: Hambledon Cottage reported a record 4,500 visitors in the year preceding April 2024²¹¹, which is an average of 87 visitors per week. This is likely due to them only being open to the public for pre-bookings for a small number of hours between some Fridays and Sundays. Currently being a relatively isolated location, this amended Concept Plan will increase physical access and amenity to the whole site.

Hambledon Cottage and Experiment Farm are also currently separated from Elizabeth Farm by the industrial complex slated for development. The updated Concept Plan seeks to redress this providing greater connectivity between the three colonial-era sites.

The updated Concept Plan will also enhance the heritage value of the area through unprecedented recognition of the area's Indigenous heritage. There are no landmarks or references in Harris Park to the area's original inhabitants and the 60,000 years of history that preceded colonisation. Through a co-design process involving Designing with Country and urban design experts, the updated Concept Plan integrates built form, landscape, and respect for both European and Aboriginal heritage.

The provision of a total landscaped area of 16,343 sqm to integrate the built form with surrounding parkland and create new parks, pedestrian and cyclist passages and accessways has been acknowledged through community engagement as the most important update to the current Concept

²¹¹ City of Parramatta, Media release: Hambledon Cottage celebrates 200 years of heritage, April 2024

Plan. This feature will deliver significant public benefit to the current and new community, as well as visitors to the area.

The site is exceptionally well located in terms of walkable access to a myriad of both private and public services. These include several public transport options, open space, health and education services and the full range of commercial and retail opportunities typical of a major centre.

For more information, refer to the updated SIA (July 2025) and the updated Community and Stakeholder Engagement Plan (July 2025).

9 Conclusion

This Response to Submissions Report has been prepared to support the continued assessment of a SSD application at 2A Gregory Place, Harris Park. The application seeks *concept approval* only under part 4, division 4.4 of the EP&A Act, with detailed development applications to follow in accordance with the approved concept and staging strategy.

The report provides a comprehensive response to the issues raised in public and agency submissions received during the exhibition period (December 2022 to February 2023). It is also the product of an extended process of post-exhibition consultation and design refinement, informed by collaboration with the Government Architect NSW, the State Design Review Panel, City of Parramatta Council, local Aboriginal stakeholders, technical agencies and the community. The revised scheme represents a significantly improved outcome, resolving the key concerns raised while maintaining the project's public purpose and viability.

This report demonstrates that the proposed development is justified, appropriate and compatible in the context of the site's constraints, heritage setting and strategic location. The proposal responds to the urgent and well-evidenced need for affordable housing within the Parramatta LGA and the Central River City more broadly. As established in Sections 2.1 and 2.2 of the report, the supply-demand imbalance for affordable rental housing is critical, and the Gregory Place project will directly address this need by delivering approximately 320 new affordable homes as part of a mixed tenure, build-to-rent model.

The project's compatibility has been rigorously tested through a structured, triple bottom line framework, introduced in Section 3.2 and applied across Sections 3.4 to 3.6. The assessment methodology draws on the objects of the EP&A Act (particularly section 1.3), the policy intent of the Housing SEPP 2021, and principles of good urban design, social equity and ecological sustainability.

Through this assessment process, the following conclusions are supported:

- The proposed concept is compatible with the environmental capacity, social needs and infrastructure context of the site, satisfying the criteria under clause 39 of the Housing SEPP.
- The refined design appropriately responds to the SCC issued in 2017, preserving and enhancing the setting of Hambledon Cottage and the adjacent cultural landscape.

The proposed height and massing, although exceeding the existing LEP controls, are supported by a detailed clause 4.6 request (Appendix C), which establishes that compliance with the control is both unreasonable and unnecessary in this instance, and that the departure will deliver a better planning outcome.

The proposal will deliver substantial and enduring public benefit through the provision of affordable, well-located housing and the transformation of an underutilised industrial site into a sustainable, walkable residential community.

This Response to Submissions Report is supported by a full suite of updated technical and expert assessments, including heritage, urban design, social and economic impacts, visual amenity, sustainability, infrastructure capacity and ecological conditions. These appendices form an essential part of the department's evidentiary base for assessment and reflect a process of genuine refinement, consultation and responsiveness.

Importantly, this concept SSD application is not a request for full and final development consent. It seeks approval for the strategic framework, land use mix, maximum building envelopes, indicative layout and key urban design principles that will guide subsequent detailed design stages. Each future stage will be subject to further assessment, compliance with the approved concept, and additional consultation where appropriate. This staged approach provides the flexibility to ensure design excellence and responsiveness to site-specific issues while giving the department and community confidence in the overarching structure and intent of the development.

On this basis, the application demonstrates a high level of strategic merit, social utility and statutory compliance. It aligns with the objectives of the *Greater Sydney Region Plan*, the *Central City District Plan*, the *Parramatta Local Housing Strategy* and the broader Housing SEPP framework. It also gives effect to the enabling provisions of the previously issued SCC and applies a transparent and robust response to the matters raised in submissions.

It is respectfully submitted that the concept SSD application should now proceed to determination, with appropriate conditions, to enable the delivery of an exemplary affordable and inclusive housing precinct in the heart of metropolitan Parramatta.



Figure 33 View to south green spine