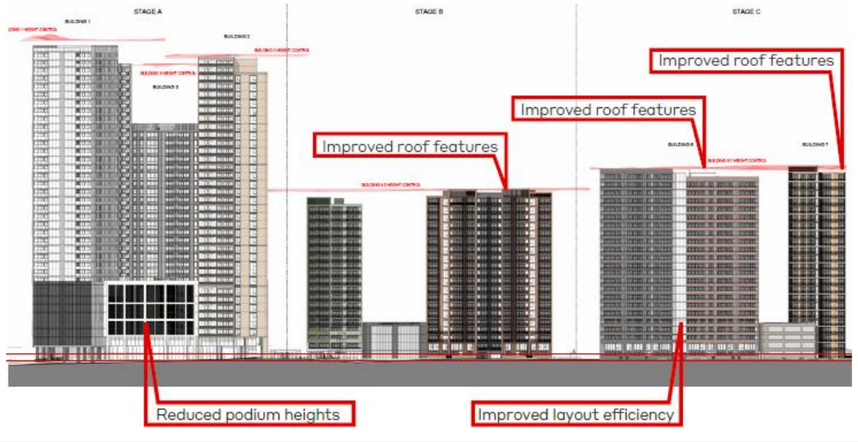
Appendix A – Submissions Register

Public Authority and Agency Submissions

Summary of Issue Raised	Response	Reference / Appendix
NSW Department of Planning, Housing and Infrastructure (DPHI)		
Building Height / Overshadowing The architectural roof features (ARFs) which protrude above the maximum height control should be deleted or redesigned in accordance with the State Design Review Panel (SDRP) advice to reduce their visual and overshadowing impact. The Clause 4.6 Variation request is to be reviewed accordingly.	The amended design includes the reduction of rooftops to ensure they do not exceed the maximum height control. Specifically, the architectural roof features of Buildings 05, 06, and 07 have been adjusted to sit below the 30% uplift height planes. The revised heights are indicated with a comparison of the EIS to the RTS scheme and a diagram to demonstrate the reduced roof features. A revised 4.6 variation request has bene prepared to reflect this. **EIS Proposal:** Building 01 – 37 Levels – 124.80 meters (RL 135.90) Building 02 – 35 Levels – 117.96 meters (RL 129.55) Building 03 – 25 Levels – 87.55 meters (RL 98.92) Building 04 – 19 Levels – 64.23 meters (RL 75.70) Building 05 – 21 Levels – 70.89 meters (RL 83.30) Building 06 – 23 Levels – 77.44 meters (RL 89.75) Building 07 – 23 Levels – 79.00 meters (RL 91.00) **RTS Heights:** Building 01 – 37 Levels – 121.05 meters (RL 134.05) Building 02 – 36 Levels – 116.60 meters (RL 129.60) Building 03 – 31 Levels – 90.80 meters (RL 103.80) Building 04 – 19 Levels – 64.70 meters (RL 75.70) Building 05 – 20 Levels – 67.56 meters (RL 78.90) Building 06 – 23 Levels – 73.40 meters (RL 86.50) Building 07 – 23 Levels – 75.20 meters (RL 87.80) 	Revised Architectural Plans -Appendix E Clause 4.6 Variation Request (Height) - Appendix V
Car Parking	A total of 1450 residential car parking spaces are provided (excluding visitors). This is a reduction in total provision from SSDA submission. Importantly due to the changes in the unit mix and total number of apartments, the difference in provision compared to the non-discretionary car parking	Section 4.1.4 of RTS/Amendment Report

Summary of Issue Raised	Response	Reference / Appendix
The proposal includes 1,480 above ground residential car parking spaces, which significantly exceeds the Housing SEPP minimum non-discretionary car parking rates by approximately 250 spaces (20%) and contributes to the bulk and scale of the development and visual impacts to Woodville Road and Crescent Street. The Department recommends that you: a) reduce the amount of residential parking, noting the site is located within an accessible area and walking distance of public transport	rates is reduced to 125 spaces on the basis that the Housing SEPP generates a minimum requirement of 1,325 residential parking spaces (see page 28 of the TTPP report). As part of the previous rezoning of the site to MU1 and R4, site-specific car parking controls were introduced under Clause 6.21(4) of the CLEP. This followed comprehensive traffic impact assessments and detailed reporting. The inclusion of these controls in the CLEP, rather than the DCP, reflects the rigorous planning process undertaken to establish parking rates that are both commercially viable for the proponent and result in acceptable traffic impacts on the site and surrounding area. This was one of the key commercial factors taken into account for the development viability. The TTPP analysis on page 28 of its report identifies that the proposed development under the CLEP will generate a maximum total of 1,948 spaces (inclusive of visitor parking) compared to the provision of 1,474 total spaces (1,450 residential, 24 visitor). This is a significant reduction below the maximum car parking rates set as part site specific provisions for the land. It further demonstrates an intent by the applicant to fairly balance the provision of car parking that meets market expectations, while acknowledging the planning intent to drive modal shift in transport use. While the development site is considered accessible (within 800m of a train station), it is located on the fringe of the accessible area and realistically presents a more challenging proposition for families and occupants needing a car for employment when considering access and proximity to public transport, and adjacency to major arterial roads. Pursuant to a Bill tabled in the NSW Parliament Environmental Planning and Assessment Amendment (Planning Systems Reforms) Bill 2025, it is proposed to amend section 4.15 of the Act that will bring further clarity to the application of non-discretionary standards. Indeed based on the proposed Bill under section (3)(a)(ii), the non-discretionary standard of the Housing SEPP would not apply on the basis that the corresponding provision of the CLEP is less onerous than the SEPP provision. (3) If an environmental planning instrument or a regulation contains a non-discretionary development standard and the development the subject of a development application does not comply with the standard— (a) subsection (2) does not apply and the discretion of the consent authority under this section and section 4.16 is not limited as referred to in that subsection, and (b) the consent authority must determine the development application by taking into consideration— (i) the non-discretionary development standard, or (ii) if a corresponding provision of a relevant environmental planning instrument is less onerous than the non-discretionary development standard—the less onerous corresponding provision. While not yet enacted into law at the time of preparing the RtS, the Bill reflects the NSW Government's approach and further supports the applicant's position in respect to parking provision.	Revised Transport Impact Assessment - Appendix P

Summary of Issue Raised	Response	Reference / Appendix
b) explore options to reduce the visual impact of the above ground parking having regard to: – the recommendations of the SDRP. – Council's comments recommending the provision of a more visually engaging façade treatment for the above ground car parking façade. – Whether alternative options, including partial (rather than full) basement car parking option(s) have been considered and investigated. – Further opportunities for sleeving.	The car parking podium structures fronting Crescent Street have undergone fundamental redesign through integration of podium structures to make them more efficient in terms of spatial planning and reduce the scale of the podium from 7 levels to 4 levels. While it is not feasible to construct basement car parking, this redesign has responded positively to the SDRP's comments in terms of visual impact. This building height reduction materially improves the relationship between the podiums and the street by reducing bulk and creating a more human scale to the street edge. The podium car park facades have been simplified, removing previously proposed glazed facades, with greater reliance on landscaping including street verge planting to soften this building edge. As per previous studies and engagement with the SDRP, the southern orientation and exposure to the existing elevated rail corridor does not make the podium structure suitable for sleeved residential dwellings along the Crescent Street frontage.	Revised Design Report -Appendix F
c) Reallocate additional parking to visitor parking (noting only 1 space per 81 apartments is currently proposed).	Visitor parking spaces have been increased to a total of 24 which reflects a ratio of 1 visitor space per 57 apartments. In addition it is noted that: • The site curtilage along Crescent Street can accommodate approximately 20 spaces kerb side in a location where there is no other demand for use. • 50 parking spaces are provided for retail use. These car spaces are anticipated to be available to the public on a short stay basis that will support the retail use but also provide an alternative for visitors who may both use the retail and visit residents on the same journey. The effective supply of short term non allocated car spaces for visitors to the precinct is higher and reflects the mixed nature of the site.	Section 4.1.4 of RTS/Amendment Report Revised Transport Impact Assessment - Appendix P
Woodville Road Interface Explore options to improve the appearance and interface of the eastern elevation of the Building 1/2/3 podium to the proposed future widened Woodville Road, noting that following the road widening, the eastern elevation would be highly visible in the public domain. In particular: a) clarify the architectural treatment of the podium and its interface with the future TfNSW road widening and its likely footpath and ensure the resulting eastern elevation presents adequate visual interest. b) further consider opportunities to sleeve the Woodville Road elevation. c) reconsider the proposed location of the proposed pedestrian footpath and staircase connecting the Building 1/2/3 podium to Woodville Road, noting this staircase would be located hard against the likely TfNSW road-widened Woodville Road and is therefore likely to present as a sheer wall to the roadway.	The amended design sleeves the podium primarily along the western façade, where apartments directly overlook and activate the park. On the eastern side, Woodville Road functions as a fast-moving arterial road with limited amenity for residential outlook. In addition, TfNSW has identified a potential new entry road within the adjoining reserve, further constraining opportunities and merit for sleeving. In response, the Woodville Road elevation has been treated with articulated vertical screening that serves as façade articulation. These measures provide visual interest, manage scale, and enable natural ventilation to the car park while acknowledging the functional and contextual constraints of this frontage. It is not feasible to sleeve this frontage with active uses for two key reasons: • Servicing Requirement – This location must accommodate supermarket and podium servicing, making active frontage incompatible with operational needs. • Acoustic and Amenity Constraints – Woodville Road presents the poorest acoustic conditions on the site. Introducing residential or other sensitive uses here would compromise amenity.	Revised Architectural Plans -Appendix E Revised Design Report -Appendix F

Summary of Issue Raised	Response	Reference / Appendix
	Further, pedestrian activity along Woodville Road is limited, so active uses in this location would not achieve meaningful engagement. Instead, the amended design improves the pedestrian environment through: • A masonry podium treatment with potential for public art, articulated in bays to break down bulk. • Ventilated plant and BOH areas concealed behind consistent angled screens, creating visual variation when viewed in motion. • Lowered ground levels (by 2 metres) to strengthen pedestrian connectivity. • Enhanced landscape treatment with graded footpaths and planting to soften the interface. This approach achieves a balanced outcome - acknowledging operational and acoustic realities - while still delivering an improved pedestrian realm along Woodville Road.	
Provide a computer-generated image showing a perspective of the architectural appearance of the Building 1/2/3 podium eastern elevation as it presents to the TfNSW widened Woodville Road.	A view of the Eastern podium facade included in the amended design report.	Revised Architectural Plans -Appendix E Chapter 07 Revised Design Report -Appendix F
Internal Road / Crescent Lane The internal north-south road with turning head and parking located outside the Building 1/2/3 podium (Crescent Lane) creates a barrier between the development and the public open space. Noting that alternative non-residential parking with convenient access to retail units is provided within the Building 1/2/3 podium, the Department recommends that you consider removing Crescent Lane entirely to create an urban plaza connecting the retail units to the public open space as recommended by the SDRP. If Crescent Lane is retained, it should be reduced in the length by at least half to better integrate the development with the public domain / open space and: a) reduce the 90 degree parking within Crescent Lane by 50%. b) reconsider whether a turning head is required, noting vehicles using the internal road would be limited to residents / visitor cars (i.e. not larger service vehicles). If required, explore alternatives less intrusive options.	There are traffic engineering and retail viability considerations associated with the internal road and parking spaces fronting the retail podium. The Department recommended reconsidering whether a turning head is required, noting that vehicles using the internal road would be limited to residents and visitor cars rather than larger service vehicles. The applicant's traffic consultant, The Transport Planning Partnership (TTPP), has advised that a turning head is required to ensure safe and functional operation of the internal road network. Importantly, Australian Standard AS2890.1 requires a turning head where parking spaces are associated with public use, including the supermarket. This provision ensures that all vehicles, including visitor cars, ride share and taxis, can turn efficiently without reversing movements that would compromise pedestrian safety or create operational conflicts within Crescent Lane. The design has already been refined to shorten Crescent Lane and improve its integration with the public domain. The turning head in its current form provides the minimum geometry necessary for compliance with AS2890.1 while limiting its impact on the park and enhancing pedestrian connections. On this basis, the applicant supports retention of the turning head as required by the Australian Standard and confirmed by the traffic engineer. As outlined in the Design Report, the viability of the retail frontages is dependent on providing convenient short stay car parking to support casual visitation and activation of the park edge. Removal of Crescent Lane would undermine the viability of these retail spaces and reduce the likelihood of successful retail activation.	Revised Architectural Plans -Appendix E Revised Design Report -Appendix F

Summary of Issue Raised	Response	Reference / Appendix
	The design has been amended to shorten Crescent Lane and reduce its impact on the public domain. The amended design demonstrates that: ▪ The road length has been reduced**,** limiting the extent of hardstand within the open space. ▪ A stronger and more direct pedestrian connection has been introduced between the northern podium retail units and the park. ▪ The balance between necessary short-stay parking / service access and high-quality public domain integration has been improved. The revised design is considered to appropriately address the Department's and SDRP's concerns while retaining essential short-stay car parking required to support the viability of retail spaces.	
Design The design of the ground floor level beneath the northern end of Building 1/2/3 podium creates an extremely large undercroft area. The Department requests further consideration of: a) the need for such a large undercover space, noting it does not serve a clear, defined use or purpose and may attract antisocial behaviour. b) the viability of proposed soft landscaping within the undercroft noting the likely lack of adequate sunlight. c) Infilling the space with functional / usable floor space.	The amended design has addressed the Department's concerns regarding the undercroft at the northern end of the Building 1/2/3 podium through the following refinements: • Reduced Building Footprint – Improved efficiency of internal layouts has enabled a significant reduction in the podium footprint, minimising the extent of the undercroft space. • Structural Simplification – The number of visible columns within the undercroft has been substantially reduced, resulting in a cleaner, more open environment. • Enhanced Access and Amenity – Access is now provided via a gently graded ramp integrated with surrounding landscaping. Rich planting and material treatments soften the space and improve amenity, ensuring the undercroft is legible, safe and welcoming. Updated renders have been prepared to demonstrate the design evolution and illustrate the improved outcome (refer to architectural and landscape drawings). The amended design reduces the overall ground level to RL 13.00, improving connection with Woodville Road and minimising the extent of undercroft space. The area now serves clearly defined functions, including: • Building 1 Lobby and Bicycle Parking – Active uses located within the undercroft provide passive surveillance and regular activity. • Improved Public Realm Integration – The reduced level ensures the space is visually connected to adjoining pedestrian areas. • Safety and Amenity Measures – The undercroft will be well-lit, landscaped and detailed in accordance with CPTED principles to discourage antisocial behaviour and create a safe environment. Accordingly, the space is no longer a residual area but a functional, supervised and integrated part of the ground plane. The amended design incorporates a robust planting strategy to ensure landscaping within the undercroft is both viable and enduring. Key measures include: • Species Selection – Shade-tolerant and low-light planting species have been specified, supported by Arcadia's planting schedule, to ensure long-term viability in reduced sunlight conditions.	Chapter 05, 07, 07.18 Revised Design Report - Appendix F

Summary of Issue Raised	Response	Reference / Appendix
	• Supplementary Lighting – Integrated artificial lighting will be provided to supplement natural daylight where required, promoting healthy plant growth and enhancing amenity. • Visual Amenity – The landscaping is designed to soften the undercroft environment, provide visual interest, and reinforce pedestrian amenity even in shaded areas. Together, these strategies ensure that landscaping within the undercroft will establish successfully and contribute positively to the quality and safety of the space.	
Justify the provision of a large awning proposed over the 'amenity' GFA of Building 6 fronting Crescent Street, noting this creates a large undercroft area, a potential area for anti-social behaviour when the space is not in use and reduces landscape potential to Crescent Street.	The amended design has been refined to balance weather protection, activation and landscape outcomes along Crescent Street. In particular: Justification for Awning – The awning provides essential weather protection for the Building 6 amenity space, ensuring year-round usability and comfort for residents and visitors. It also enhances the legibility of the amenity frontage and reinforces the address to Crescent Street. Undercroft Reduction – The extent of undercroft has been minimised compared with the previous scheme, with clear sightlines from the street into the amenity space to discourage antisocial behaviour. Safety and Surveillance – Adjoining amenity uses provide passive surveillance, while lighting and material treatments further enhance safety. Landscape Integration – Landscape areas along Crescent Street have been increased and better integrated, ensuring the awning does not diminish the contribution of planting to the public domain. Together, these refinements ensure the awning strengthens activation and usability of the Crescent Street frontage, while mitigating concerns around undercroft scale, safety and landscape potential.	Revised Architectural Plans -Appendix E Chapter 08 Revised Design Report -Appendix F
Trees and Biodiversity Investigate the potential for retaining a greater number of existing trees. In particular, the Department notes the following (non-exempt) trees could be retained as they appear to be located with sufficient distance from the proposed buildings, infrastructure and earthworks and/or structures and footpaths could be adjusted: a) Crescent Street: on-site trees: T1 to T3, T5, T8, T10, T12, T15, T17, T19, T20, T23, T25, T26, T30 to T34, T42, T44 to T46, T53 to T78. b) Woodville Road: on-site trees: T71 to T79, T81, T85 to T88, T100 to T105, T110, T112 and T125, and off-site trees: T126, T127, T781 to T783, T861, T871 to T873. c) A'Becketts Creek boundary: on-site trees: T12901 to T12921. Update Appendix D of the Arboricultural Impact Assessment to include justification / reason for each tree removal.	a) The potential for retaining a greater number of existing trees has been investigated. However, the trees identified on Crescent Street (T1 to T3, T5, T8, T10, T12, T15, T17, T19, T20, T23, T25, T26, T30 to T34, T42, T44 to T46, T53 to T78) are majorly encroached upon by the proposed road widening works along Crescent Street. This encroachment makes it challenging to retain these trees without significantly impacting the planned infrastructure and earthworks. Adjustments to structures and footpaths have been considered, but the extent of the road widening necessitates the removal of these trees to ensure the project's feasibility and safety. b) ELA has assumed that the trees are in reference to all trees to the east of the site near Woodville Road, they have been investigated for retention. However, ELA has been informed that a large portion of this area is required to facilitate construction vehicle access for the construction of Building 1, as shown in Figure 18. Additionally, cut and fill operations are proposed up to the boundary of the site, along with landscaping works. Furthermore, as per the EIS (Urbis, 2025), this area is identified as having potential to be impacted by future TfNSW proposed road widening works along Woodville Road. To mitigate the loss of these trees, replacement planting is proposed throughout this area, regardless of potential future works.	Section 4.1.3 of RTS/Amendment Report Revised Arboricultural Impact Assessment – Appendix K

Summary of Issue Raised	Response	Reference / Appendix
	c) ELA notes that trees T12901 to T12921 along the A'Becketts Creek boundary have been investigated further. Due to levels of fill of up to approximately 1.5 metres, proposed hardstand surfaces, landscaping, and the installation of sewer pipes and pits, these trees are considered incompatible for retention. Fill, or battering, may suffocate roots by reducing oxygen diffusion into the soil. AS4970-2025 outlines how even small amounts of fill can alter soil aeration and moisture regimes. In addition, fill may cause soil compaction and alter pH. Importantly, the placement of soil over existing root zones will lead to tree decline and mortality, and there are associated risks of contamination spread and inconsistency with the proposed soft-cap contamination management strategy. d) Appendix D of the Arboricultural Impact Assessment has been updated to include justification and reasons for each tree removal. This information is now presented in a column listing the specific works within each NRZ (reference now Appendix F).	
Open Space and Landscaping Explore options to improve the pedestrian connectivity between the public domain and open grass component of the proposed public open space. This should include consideration of: a) removing or amending Crescent Lane adjacent to the retail units. b) Improving the layout and design of Park Lane in response to the SDRP's comments relating to shared zone, hierarchy of uses and relationship to the open space and character.	Crescent Lane adjacent to the retail units is essential to the viability of the retail offer. The supermarket and supporting tenancies require proximate, convenient parking and vehicle access to attract and retain customers. Removing or amending Crescent Lane would significantly reduce short-stay parking and diminish visibility and accessibility, directly undermining the commercial feasibility of the retail. The retail consultant's advice confirms that without convenient access and on-grade parking, the tenancies risk long-term vacancy. This would compromise activation of the precinct, contrary to the objectives of the SSDA. The current design, therefore, balances the need for an activated parkland interface with the critical requirement to provide viable, serviceable retail frontage. The layout and design of Park Lane have been revised in direct response to the SDRP's comments. The street has been rationalised and reconfigured to clearly establish a hierarchy of uses and strengthen the relationship between the retail precinct and the parkland. The revised design improves legibility, enhances the shared zone character, and provides a more seamless connection to the adjoining open space.	Page 5 of the Revised Landscape Report – Appendix J
Confirm whether the landscaped area located between the Building 7 podium and the western boundary is proposed as communal open space or an inaccessible landscaped area.	The landscaped area between Building 7 podium and the western boundary has been redesigned as private open space for the adjoining ground-level residences. This approach provides a high-amenity outlook and usable landscape directly accessible to those dwellings, while avoiding the creation of inaccessible residual space. The area will therefore not function as communal open space but as dedicated private residential open space along the western edge.	Page 10 Revised Landscape Report – Appendix J
Review the functionality, use and design of the open space north of Building 7 podium to improve its amenity, safety, access, usability and its relationship to Building 7.	The northern open space adjoining Building 7 has been redesigned to improve amenity and safety. The area now provides direct use for adjoining private residences, while a generous landscaped buffer with canopy planting has been retained along the site boundary to maintain separation and visual amenity.	Landscape Drawings 4001, 4002 – Appendix J
The northern podium level resident access from Building 7 down to the northern surface level communal open space appears understated and may lack sufficient visual and physical connection. This podium also presents a large blank northern wall to the northern communal open space in this location. Consider either:	Levels have been adjusted. The podium levels have been adjusted to strengthen the visual and physical connection between Building 7 and the northern communal open space. These changes reduce the extent of blank walling and improve accessibility and integration between the podium and the adjoining open space.	Page 7 Revised Landscape Report – Appendix J

Summary of Issue Raised	Response	Reference / Appendix
a) providing mounded or stepped terracing against the above ground car parking, with integrated stairs and path down the space; and/or b) providing a more substantial pedestrian connection (physical and visual) from the Building 7 podium down to the northern communal open space; or c) justifying the current design in response to the above concerns.		
Confirm the location of the boundary between the public open space adjacent to Building 6 and the communal open space adjacent to Building 7 and confirm how these two spaces would be physically separated / controlled.	The boundary between the public open space at Building 6 and the communal open space at Building 7 will be defined by a fence and gate system. Access to the communal areas, including the community garden, will be controlled via resident swipe to ensure security while maintaining clear separation between public and private domains.	Page 10 Revised Landscape Report – Appendix J
Explore options to improve the relationship of the development frontage and landscaping to Crescent Street by: a) addressing the SDRP's comments relating to providing a development interface design (entries, amenity nodes and wayfinding) that is safe and welcoming to the community.	The interface has been revisited to provide clearer and more direct pedestrian paths, along with improved sightlines to amenity zones. These changes enhance safety, legibility, and create a more welcoming arrival experience for the community.	Page 10 Revised Landscape Report – Appendix J
b) incorporating the two substations proposed in front of Building 7 and the substation in front of Building 5 facing Crescent Street into the above ground parking or into the façade.	The substations are been provided in accordance with authority requirements. Residential projects in areas where there are no major flooding issues are very rarely approved by the supply authority to be elevated into podium car parks or the like. The location provided is compliant and early incorporation into the landscape strategy will allow for effective management of complaint access and aesthetics.	Revised Landscape Report – Appendix J
c) reducing the number and extent of proposed footpaths connecting Buildings 6 and 7 to Crescent Street. In particular: – Relocate the Building 6 Fire Pump Room (FPR) door access to be east facing onto the Phase 2 Fire Booster area and remove the FPR footpath connection. Confirm whether the proposed footpath connection to the Phase 2 Fire Booster area needs to be as wide as proposed. – rationalise the footpath accesses from Crescent Street to the Building 7 FPB, FPR and Cold Meter rooms and substations. – redesign the footpath entrances to the Building 7 lobby and staircase up to podium level and bike store to provide a single unified footpath connection. – provide for a more direct footpath connection between Crescent Street and the Building 7 Amenity room.	The Crescent Street interface has been revisited, with the number of footpath connections reduced and circulation simplified. Access points have been rationalised to simplify footpath connections to Building 7 services, improving legibility and reducing unnecessary crossings. The revised layout provides more direct routes with improved sightlines to amenity zones, ensuring both clarity and safety in pedestrian movement. The stairs have been removed and the footpath realigned to follow the dominant pedestrian movement, providing a more direct and legible connection to the Building 7 Amenity room.	Page 7, 13 Revised Landscape Report – Appendix J Landscape Drawings 4002, 4004 – Appendix J
Update the landscape plans as follows: a) provide a section showing how the site interfaces with the shared northern site and A'Becketts Creek boundary (including earthworks and any retaining structures). In addition, provide an image showing the interface as seen from the part of the adjoining Holroyd Sports Ground field opposite the site.	A section has been prepared illustrating the site interface with the northern boundary and A'Becketts Creek. Refer to Page 25 for detailed information. Additionally, an image showing the interface as seen from the part of the adjoining Holroyd Sports Ground field opposite the site has been included.	Revised Landscape Report – Appendix J
b) demonstrate sufficient soil depth and volume is provided to ensure viability and vitality of proposed trees: – provide sections through the ground floor public and communal open space deep soil areas to confirm soil depths and volumes. – confirm the planting medium(s) for on-structure planting at podium levels (e.g. mounding, planters etc) and provide sections.	Refer to Sections 001-003 The planting mediums for on-structure podium planting are detailed in the podium sections and levels drawings. These confirm soil depths and construction methods to support healthy long-term planting.	Page 7, 8, 24-28. Revised Landscape Report – Appendix J Sections 001-003 Revised

Summary of Issue Raised	Response	Reference / Appendix
– relate the proposed soil depths to proposed tree species to demonstrate sufficient soil depth and volume is provided to ensure viability and vitality of proposed planting.	Proposed soil depths and volumes have been matched to the requirements of the selected tree species to ensure their long-term viability and vitality. This is demonstrated in the soil diagram	Landscape Plans – Appendix J
c) provide a plan (drawn to scale and including date and reference), specifying the trees for retention and removal. The plan should also annotate each tree with the Arboricultural Impact Assessment tree references.	A detailed plan identifying trees for retention and removal has been prepared. Refer to the retained and removed trees plan.	Page 7 Revised Landscape Report – Appendix J
d) update drawings L-4001 to L-4009 to include proposed spot RLs levels within public and communal open spaces, roads, footpaths and at building interfaces. In addition, include existing RL levels adjacent to the site boundaries to clarify how the site interacts with existing adjoining levels.	Drawings L-4001 to L-4009 have been updated to include proposed spot RL levels within public and communal open spaces, roads, footpaths, and at building interfaces. Additionally, existing RL levels adjacent to the site boundaries have been included to clarify how the site interacts with existing adjoining levels. These updates have been modelled in BIM/Revit for accuracy and clarity.	Drawings L-4001 to L-4009 Revised Landscape Plans – Appendix J
e) update drawing L-4006 to include a complete ramp footpath access from the public domain to the Building 4 commercial unit (150 m²) and a fence/gate separating the unit and residential communal open space (as shown in the architectural drawings).	Drawing L-4006 has been updated to include a complete ramp footpath access from the public domain to the Building 4 commercial unit (150 m²). Additionally, a fence and gate separating the unit from the residential communal open space, as shown in the architectural drawings, have been incorporated.	Revised Landscape Report – Appendix J Drawing L-4006 Revised Landscape Plans – Appendix J
f) clarify what point 5 of the Ground Floor Masterplan key (p23) ('retain existing trees in raised up walls informing the location of surrounding paths') is referring to, noting the application (as submitted) proposes the removal of almost all trees.	Drawings L-4001 to L-4009 have been updated to include proposed spot RL levels within public and communal open spaces, roads, footpaths, and at building interfaces. Additionally, existing RL levels adjacent to the site boundaries have been included to clarify how the site interacts with existing adjoining levels.	Revised Landscape Report Drawings L-4001 to L-4009 Revised Landscape Plans – Appendix J
g) clarify what the six rectangular shapes along the northern boundary represent.	The six rectangular shapes along the northern boundary represent existing concrete retaining walls around the trees. Please refer to Plan 1100 for further details.	Plan 1100 Landscape Plans – Appendix J
h) update the 'Ground Floor Public and Private Space' diagram and calculations (p26) to take account of any landscaping amendments made in response to this letter.	The 'Ground Floor Public and Private Space' diagram and calculations on page 26 have been updated to reflect the landscaping amendments made in response to this letter. These updates ensure that all changes are accurately represented and accounted for in the overall design.	Page 26 of the Revised Landscape Report – Appendix J
Landowner's Consent Provide evidence of landowners consent from relevant owners for the proposed pedestrian bridge over A'Becketts Creek and provide greater certainty for the provision of this link. Provide evidence of landowner's consent for any proposed removal of trees outside the site boundary.	Council's Director of Planning advised by email dated 19th September 2025 the following in respect to the proposed pedestrian bridge: "Council officers have reviewed the updated pedestrian/cycle bridge design over A'Becketts Creek as provided in the email. The concerns raised by Council have been addressed in the information provided and Council can accept the concept design on an in-principle basis".	Refer to Amended Bridge Design and email from Council 19th September 2025 - Appendix SS

Summary of Issue Raised	Response	Reference / Appendix
	We are seeking further clarity from Council but take this as acceptance to include in the application albeit as further noted by Council that further approvals from Council would be required for construction. A copy of the updated bridge design together with the email from Council dated 19th September is included in the documentation.	
Planning Agreement Provide evidence of Council's in principle agreement to a Letter of Offer setting out the Planning Agreement terms.	The intent to prepare and agree a Letter of Offer for a Planning Agreement was proposed as a basis for the Council's acceptance of dedication of the park and associated roads. Despite on-going discussions with Council, the applicant has yet to secure any in-principle agreement on the terms of dedication. Indeed, Council's email dated 19th September 2025 advises that: *"Should the SSDA be approved by the Department, discussions on specific measures for implementation and confirmation of satisfactory remediation of land for the park can continue between Council Officers and the applicant".* However noting councils strong objection to accepting dedication of any contaminated land, irrespective of the capping strategy, , it is unlikely the applicant would be able to secure agreed arrangements on specific measures for implementation and satisfactory remediation prior to determination of the SSDA. Therefore, without any assurance of being able to meet Council's requirements to enable dedication at this time and prior to determination, the applicant proposes that for the purposes of the issue of development consent that the park and internal road network are retained by the development, and that suitable conditions be imposed requiring rights of way over the two roads accessed from Crescent Street to enable 24/7 access to the public parkland for the community. Further to the above as part of discussions with Council, offsite active transport works initiatives have been identified. A copy of these proposed works are included in the RtS package as offered by the proponent to be undertaken. It is proposed to implement these by way of conditions of consent as opposed to the need to prepare a VPA. Council's email of 19th September 2025 supports in-principle these works.	Proposed condition of consent Refer to Proposed Off-Site Active Transport works - Appendix LL
Permissibility Demonstrate that Building 4 contains ground floor uses which categorise it as 'shop top housing', rather than a 'residential flat building' (prohibited within the MU1 zone).	The ground floor of Building 4 comprises two commercial tenancies, one at RL 13.1 located along the northern façade (Ground Floor Plan), and another at RL 11.0 located at the south-eastern corner of the building, adjacent to Crescent Street (Lower Ground Floor Plan). The ground floor of Building 4 also comprises the lobby for shop top housing, waste storage rooms, mechanical plant / servicing, and car parking for the residential apartments above. Importantly, the floor level of all the residential apartments on Level 1 of Building 4 are located at RL 16.6 (i.e. above the ceiling level of the commercial areas on the Ground Floor and Lower Ground Floor). Therefore, despite the slight level change across the site, Building 4 satisfies the two key preconditions for development to be characterised as shop top housing. In providing additional clarity on what is lawfully considered 'shop top housing', consideration has also been given to the case of *Lahoud v Willoughby City Council [2024]* NSWCA 163. In this case, the NSW Court of Appeal clarified that there is no requirement for the entire ground floor to be	Revised Architectural Plans -Appendix E Revised Design Report – Appendix F

Summary of Issue Raised	Response	Reference / Appendix
	commercial use, and that the majority of the ground floor does not need to be for commercial use. The NSW Court of Appeal also found that resident's parking located on the ground floor was a form of shop top housing. The provision of residential car parking on the Ground Floor of Building 4 does not constitute a 'dwelling'. Therefore, Building 4 has been lawfully classified as shop top housing development as there are no dwellings on the ground floor.	
Site Area / Floor Space Ratio Clarify the site area noting it differs from Cumberland City Council's (Council) digital maps. Review the gross floor area (GFA) and floor space ratio (FSR) calculations against the GFA definition in the *Cumberland Local Environmental Plan 2021*. Update the FSR Clause 4.6 Variation Request, including: a) justification for the site-specific FSR variations within mapped areas W1 and W5. b) additional planning grounds to justify contravening the FSR development standard.	The GFA and FSR calculations have been comprehensively reviewed and updated following the design changes made to the proposed development in response to submissions received. In addition, the proponent engaged Clement and Reid Project Surveyors to verify and confirm that the correct site areas have been adopted for the purpose of justifying the site-specific FSR variations across the site. Based on this technical verification, the FSR areas have been accurately determined to align with the relevant zone boundaries, as follows: ▪ Mapped FSR of W5 (3.75:1) under the Cumberland LEP 2021 – applicable to the eastern portion of the site zoned MU1 Mixed Use. ▪ Mapped FSR of W1 (3.4:1) under the Cumberland LEP 2021 – applicable to the western portion of the site zoned R4 High Density Residential. Refer to the detailed response on Section 4.1.1.3 of the RTS/Amendment Report which clarifies the site areas that apply across the site for the purpose of calculation site-specific FSR variations within the areas mapped W1 and W5 on the Cumberland LEP 2021 FSR Map. The Clause 4.6 Variation Request (FSR) has been updated to reflect the minor changes in GFA across the site, confirm the extent of site-specific variations sought to the mapped FSR controls, and to incorporate additional planning grounds justifying the variation to the mapped FSR development standards.	Letter from Surveyor - Appendix T Revised Survey Plan- Appendix S Revised Architectural Plans -Appendix E Revised Clause 4.6 Variation Request (FSR) - Appendix U
Traffic and Transport Confirm the frequency of the proposed shuttle bus service to Harris Park and Parramatta Stations and the expected location of the set down of the bus at each station. In addition, provide further information regarding the mechanism for securing the shuttle bus service operation for the life of the development.	The Transport Impact Assessment (TTPP, September 2025) recommends the provision of a privately funded shuttle bus service linking the site with Harris Park and Parramatta Stations as part of the Green Travel Plan. <u>Frequency:</u> ▪ End State - The shuttle bus will operate every 15 minutes during peak periods (6:30-9:30am and 4:00-7:00pm, Monday to Friday) using two buses providing direct services between the site and Parramatta Station. During off-peak daytime and weekends, the shuttle will operate every 30 minutes using a single bus on a loop connecting the site, Harris Park Station and Parramatta Station. ▪ Interim State - From completion of the first phase until completion of the second phase of the development, the shuttle service will operate with a single bus covering both peak and off-peak periods, providing 30-minute services on a loop connecting the site, Harris Park Station and Parramatta Station. The uplift to the end-state two-bus service will occur once sufficient resident population and non-residential uses are established.	Revised Transport Impact Assessment - Appendix P

Summary of Issue Raised	Response	Reference / Appendix
	▪ Service levels will be subject to ongoing review as part of the Green Travel Plan monitoring framework to ensure alignment with demand. ▪ Service levels will be subject to ongoing review as part of the Green Travel Plan monitoring framework to ensure alignment with demand. <u>Set Down Locations:</u> ▪ Parramatta Station – George Street shuttle bay adjacent to the station interchange (public bus set-down area currently used by private shuttles). ▪ Harris Park Station – Station Street near the pedestrian entrance to the station. ▪ These locations are within existing transport interchanges and will be confirmed with Council/TfNSW at the detailed design stage. <u>Mechanism to Secure Service in Perpetuity:</u> ▪ The proponent accepts a condition of consent requiring the shuttle bus service to be funded and operated privately by the development (including successors in title) for the life of the project. ▪ The shuttle bus will form a mandatory element of the Green Travel Plan, which is enforceable and subject to regular review. ▪ Funding and operation will be incorporated into the Owners Corporation budget / building management structure, ensuring it is maintained on an ongoing basis in the same way as private waste collection or building services.	
Clarify whether public access via the internal road network would be secured by a right-of-way or dedication to Council. If by dedication, confirm whether the dedication would form part of a condition or the Planning Agreement.	The applicant proposes that suitable conditions be imposed requiring rights of way over the two roads accessed from Crescent Street to enable 24/7 access to the parkland for the community.	Revised Transport Impact Assessment - Appendix P
Provide further information regarding the impact of the planned Cumberland Rail Line on the site and consider any conflicts.	The proponent met with DPHI and TfNSW in January 2025 to discuss the proposed amendment to the Transport and Infrastructure SEPP in respect to the proposed underground corridor protection for the new Cumberland Rail Line. The site is adjacent to this proposed corridor. Key outcomes from this meeting include the following: **DPHI**: • Advised the future road corridor reservation is part of a long-term plan to connect Bradfield to Epping via Parramatta. • The type of underground rail is not yet determined, but the *Sydney Metro Underground Corridor Protection Technical Guidelines* are the most relevant to understanding the impact and protection of underground rail. • Confirmed that the technical guidelines only apply to development within the corridor, not adjacent to it. As such, if the alignment avoids the property, the guidelines will not apply. • Indicated minimal comments on the SSDA are expected, as the site is not within the corridor and excavation beyond 2m within 25m of the corridor is unlikely to cause an impact given proximity.	N/A

Summary of Issue Raised	Response	Reference / Appendix

	TfNSW:
	• Confirmed that any future works within the corridor are not planned for the next 10–20 years.
	  • Acknowledged awareness of the SSDA on the site and confirmed they made a conscious decision to terminate the underground rail in the Parramatta LGA to avoid impacting the site.
	  • They don't want to impede the delivery of much needed housing.
	  • Given the site's proximity to the future rail corridor, TfNSW will likely be referred to the SSDA for comment.	

Car Parking and Servicing Management Clarify the car parking arrangements, including: a) whether the proposed on street surface car parking spaces (internal roads) are included within, or additional to, the proposed total car parking space (1,616 spaces).	The surface level parking spaces are not included in the total number of dedicated resident spaces (1,474) and commercial/retail spaces (87).	Revised Transport Impact Assessment - Appendix P
b) whether the Building 4/5 podium car parking is to be shared between residential and commercial uses. If so, justify this arrangement, including in response to Council's objection to such an arrangement and clarify how the interaction of the two uses would be managed and residential security would be maintained.	The podium parking has been redesigned such that car parking associated with the commercial tenancy in Building 4 is located separate to the residential parking area and directly accessible on-grade off the Internal Street. This means that the podium car park for Buildings 4 and 5 is exclusively for residential use.	Revised Transport Impact Assessment - Appendix P
c) how future staff and visitors of the retail and commercial units would be prevented from being able to access the Building 1/2/3 podium residential parking levels and how this would be managed.	The proposal will include an internal security gate that would separate access to the residential car parking areas. All cars would traverse through the retail and commercial car parking areas with residents progressing into the upper levels of the podium for parking access.	Revised Transport Impact Assessment - Appendix P
d) how the vehicular entrances to the Building 1/2/3 podium would be designed and managed to ensure clear, defined and safe access, noting the entry/exit layouts (services vehicle, residential and retail) may be visually confusing.	Vehicle access and egress to the podium is via the driveway on the southern side of the boundary. Loading vehicles utilise the left-hand side entry and passenger cars the right-hand side entry ramp which takes cars up to the first floor level and beyond. With appropriate directional signage to be installed at the entry, there is no risk of confusion for drivers.	Revised Transport Impact Assessment - Appendix P
Provide further consideration to the space, access and manoeuvrability within the Building 1/2/3 loading dock, in particular: a) it is not possible for HRVs to exit from the (N/S oriented) 'front loading supermarket' and 'rear loading residential' spaces when the (E/W oriented) 'rear loading residential' HRV space is occupied. b) swept path analysis of a vehicle entering/exiting the (E/W oriented) 'rear loading residential' HRV space has not been provided. c) the width of the vehicle entrance to the loading dock would only allow one vehicle to enter/exit the dock at the one time. In addition, it is not clear whether vehicles could enter/exit via the entrance if the loading dock spaces were occupied.	The loading dock has been designed generally in accordance with AS2890.2:2018. However, the layout would not allow for independent access to all the loading dock spaces and would require loading dock management to coordinate access for some spaces including management of vehicles entering and exiting noting the limited width of the loading dock entry. Swept path analysis of the critical areas within the proposed car park and loading areas has been conducted using design vehicles including Australian Standard 4.91m long B85 vehicle, 5.2m long B99 vehicle, and 12.5m long heavy rigid vehicle. The analysis found that the design vehicles will be able to circulate around the car park and access the service areas satisfactorily. Swept path analysis is included in the TTPP Traffic Report.	Revised Transport Impact Assessment - Appendix P
Future Amenity (Residential Apartments) Provide further analysis of the following matters in relation to the *Apartment Design Guide* (ADG) criteria, including justification for any departures:	The design changes for all buildings have generated improved layout efficiency. Among these changes, Building 06 integrated both building forms while combining both lift cores into a single one. The building design intent has kept the 6m slot. As a result, the overall layout intent includes the following: • No bedrooms located on façades facing other apartments directly.	Revised Architectural Plans – Appendix E

Summary of Issue Raised	Response	Reference / Appendix
a) Part 3D: provide a breakdown of the communal open space calculations (m² and site percentage) with associated plan. b) Part 3F: Provide mitigation to address the following privacy concerns: – balcony to balcony overlooking at approximately 6 m between the two Building 6 towers. – oblique overlooking of windows between the two Building 6 towers. – balconies and windows of Building 6 east tower face Building 5 at 18m (being closer than the ADG 24m recommended minimum). – Building 1 and 3 are separated by 21m (being closer than the ADG 24m recommended minimum). It is noted Building 1 is cited at an angle to Building 3, however direct overlooking remains possible.	• Reduced number of windows facing each other. • Windows include oblique sight lines to prevent privacy issues, where necessary. As part of the mitigation measures to prevent privacy issues, the design considered the following items: • Oblique windows • Screening where appropriate The amended design has improved building layout efficiencies, which in turn has allowed for greater building separation. Additionally, the distances between openings have been increased as a result of these layout modifications. Therefore, the proposed amended design for Buildings 05 and 06 includes the following items: 1. Balconies facing Building 5 removed in the amended design. 2. Fewer windows orientated towards Building 5. 3. Remaining windows treated to minimise privacy impacts (e.g. opaque glazing). In order to further prevent privacy issues, the design includes the following items: 1. Progressive Separation: The distance between Building 1 and Building 3 progressively increases to enhance visual privacy. 2. Window location: The layout has placed minimum windows along the south facade of Building 01 while all living spaces are west and east facing. These thoughtful design adjustments ensure compliance with the Apartment Design Guide (ADG) criteria, addressing privacy concerns while maintaining the integrity and functionality of the living spaces.	Revised Design Report – Appendix F
c) Part 4D: provide a schedule(s) confirming habitable room depths to ceiling height, open plan layout depths from windows, bedroom and living room sizes. d) Part 4E: update the Apartment Matrix schedule (Appendix QQ) to confirm balcony sizes and include a table summarising the proposed apartment balcony areas as a sqm range (i.e. the smallest and largest for each dwelling size).	Habitable room depths to ceiling height, open plan layout depths from windows, and bedroom and living room sizes have been incorporated as part of the matrix schedule. This ensures all dimensions are clearly documented and compliant with the ADG criteria. The Apartment Matrix schedule has been updated to confirm balcony sizes. Additionally, a table summarising the proposed apartment balcony areas as a sqm range (i.e., the smallest and largest for each dwelling size) has been included. This provides a comprehensive overview of the balcony dimensions for each apartment type.	Revised Architectural Plans – Appendix E Revised Design Report – Appendix F
e) Part 4F: noting that each building (except Building 5) results in more than 40 apartments sharing a single lift, provide an analysis of lift efficiency demonstrating acceptable lift travel and waiting times.	Based on the vertical transportation analysis conducted by Collective Engineering, the lift configuration has been designed to meet acceptable efficiency standards. Lift traffic simulations confirmed that the proposed configurations provide Average Waiting Times of less than 60 seconds during peak usage periods. Collective Engineering provided a recommendation on number of lifts per building in this assessment, which the revised proposed complies with.	Revised Architectural Plans – Appendix E

Summary of Issue Raised	Response	Reference / Appendix
	Refer to Appendix 1 of Appendix JJ for further information.	Appendix 1 of Revised Infrastructure, Management & Staging Plans - Appendix JJ
f) Part 4G: update the Apartment Matrix schedule (Appendix QQ) to include a table summarising the proposed apartment storage areas as a sqm range (i.e. the smallest and largest for each dwelling).	The Apartment Matrix Schedule references the storage shown in the unit type sheets. In addition, all apartments meet or exceed ADG minimum storage standards (1-bed: 6 m², 2-bed: 8 m², 3-bed: 10 m²).	Revised Architectural Plans – Appendix E Revised Design Report – Appendix F
g) Part 4Q: confirm the number and percentage of apartments that achieve the Liveable Housing Guideline silver level.	All apartments within the proposed development have been designed to achieve the Livable Housing Design Guidelines (LHA) Silver Level, consistent with the accessibility provisions of the NCC 2022. In addition, to satisfy the requirements of the Cumberland DCP 2021 (Part B – Residential Zones, Table 9), 20% of the apartments are nominated as adaptable dwellings in accordance with AS 4299. This approach ensures compliance with both the national accessibility standards and the local planning controls.	Revised Architectural Plans – Appendix E Revised Design Report – Appendix F
Clarify how the privacy of residential apartments with windows facing directly onto communal open space and without intervening terraces (e.g. drawing DA-2207) would be protected.	The privacy of apartments directly adjoining communal open space has been addressed through a layered interface strategy. Courtyard perimeters incorporate solid fencing combined with deep planting zones, providing a physical and visual buffer between private and communal areas. Planting heights and densities are designed to screen internal resident spaces without compromising daylight access. These measures ensure residents benefit from privacy while maintaining an attractive landscaped edge that contributes positively to the amenity of their courtyards as well as of the communal space.	Revised Architectural Plans – Appendix E Revised Design Report – Appendix F
Future Amenity (Wind Conditions) Provide an updated wind impact assessment (WIA), including wind tunnel testing, which: a) provides quantitative evidence to support for the conclusions of the desktop WIA study. b) considers impacts to public and private spaces, including relevant points along pedestrian routes and within the public open space, communal open spaces, balconies and any areas intended for sitting or dining. c) identifies comfort and wind safety conditions in pre / post development scenarios and include appropriate mitigation measures to address any identified issues.	The wind tunnel study conducted by CPP Wing Engineering Consultants, provides a comprehensive assessment of the wind conditions likely to be experienced by pedestrians and residents. This study offers quantitative evidence to support the conclusions of the initial desktop Wind Impact Assessment (WIA) and considers the impacts on both public and private spaces. In general, wind conditions near the entrances and pedestrian footpath are assessed as suitable for Pedestrian Sitting and Pedestrian Standing, with stronger wind conditions on the north-east and west corners of Towers 1 and 7 respectively. Stronger wind conditions were experienced between the towers and on the podium due to channelled flow between the buildings.	Revised Wind Impact Assessment, Appendix O Section 4.1.2.4 of RTS/Amendment Report

Summary of Issue Raised	Response	Reference / Appendix
	Wind conditions on the podium terraces are generally reasonable with a comfort rating of Pedestrian Sitting and Pedestrian Standing, though strong conditions exist on the north-east gap between Tower 1 and Tower 3, and north gap between Towers 4 and 5, experienced windy conditions and fall into Pedestrian Walking and Business Walking comfort rating. These locations slightly exceed the safety criteria. Local mitigation measures are recommended to manage this exceedance. Wind conditions on the balconies experienced milder wind conditions and has a comfort rating of Outdoor Dining and Pedestrian Standing. These conditions are considered typical for conditions on balconies. Mitigation measures such as dense landscaping near the narrow gaps and extended corner awnings are outlined in Section 4 of the wind report.	
Future Amenity (Noise) Update the Noise and Vibration Impact Assessment (NVIA) to: a) clarify why a long or short term monitoring station (NVIA Figure 2) was not provided at the north-western side of Residential Receiver Catchment area RC4 (Bane Street) to measure the as-existing noise level(s), noting the proximity of this point to affected residences and that the NVIA recommends monitoring in this location (NVIA Figure 7) as part of the future noise management / mitigation measures.	LT5 and ST5 monitoring location (refer to Figure 3) was used as the representative location for RC4. The north western side of RC4 was determined not suitable at the time of monitoring due to reflection effect from the residential boundary fencing and extraneous noise sources (i.e. construction noise) that was identified at the time of noise monitor install which would not provide representative background noise levels of the residential receiver catchment. Note that noise monitoring recommended in Figure 7 is related to mitigating construction noise impacts to receivers within the nominated catchments.	Section 6.3 of Revised Noise and Vibration Impact Assessment – Appendix R
b) consider the construction noise impacts of the staged construction and occupation of the developments of following buildings. In addition, update Section 10.4 to include predicted noise levels of the below phases: – construction noise impact of Phase 2 and 3 on a potentially occupied Phase 1 – construction noise impact of Phase 3 on potentially occupied Phase 1 and 2	Construction noise assessment has been updated to assess impacts to potentially occupied phases.	Revised Noise and Vibration Impact Assessment – Appendix R
c) consider the potential operational noise impact of the operation of the loading dock on future residential occupants within apartments, particularly within podium level and at Buildings 3 and 4. d) consider the potential operational noise impact of the potential future use of the ground floor retail / commercial uses as restaurant / cafes with outdoor dining.	Operational noise impacts of the operation of the loading dock on future residences in apartments directly above the loading dock have been assessed and included in this revised NVIA. At this stage, tenants for future retail and commercial spaces have not been determined and therefore the usage / type of activities for these spaces are unknown. Future tenants are subject to a separate development applications or CDC to ensure operational noise limits are achievable. A list of operational noise considerations has been provided and will be addressed in forthcoming Development Application (DA) and Complying Development Certificate (CDC) submissions.	Revised Noise and Vibration Impact Assessment – Appendix R
a) provide any necessary additional mitigation measures, or loading dock time restrictions to address potential noise impacts identified in the preceding points.	Given the development proximity to the motorway and railway line, the predicted noise levels on the façade are expected to be exceeded in the scenario the occupant wishes to leave the window/door open. As a result, apartment areas requiring alternative means of ventilation (i.e. mechanical ventilation) to meet NCC requirement have been identified and provided in Section 10.3 and Appendix C.	Revised Noise and Vibration Impact Assessment – Appendix R
Improve the amenity of Building 4/5 as follows:	The podium and building form have been modified so that the commercial tenancy at the base of Building 4 no longer presents west-facing windows into the adjoining communal open space. The modified podium, that unifies Building 04 and 05, now includes an amenity spaces at Level 4. This	Revised Architectural

Summary of Issue Raised	Response	Reference / Appendix
a) remove the west facing windows of the ground floor commercial unit (150 m²) in Building 4 that face into the adjoining residential communal open space. b) provide an internal route from the lifts of Building 5 to the communal open space that is not via the car park or an emergency exit corridor.	modification keeps the previous commercial location acting as an additional street activation anchor facing the park. The amended design provides direct internal access from the Building 5 lifts to the communal podium rooftop at Level 4. This ensures residents can reach the amenity space without passing through the car park or emergency exit corridors, delivering a safe and convenient connection consistent with ADG requirements.	Plans – Appendix E Revised Design Report – Appendix F
Environmental Impacts (Flood Risk Assessment) Update the Flood Risk Assessment to confirm the as-existing flood depths during the 1% Annual Exceedance Probability and Probable Maximum Flood (PMF) that specifically occur on the site.	As per Flood Risk Assessment report September 2025 which include advice provided by Council, the 1% AEP flood does not occur on site. Council did not provide PMF flood levels and therefore the depths on site cannot be specifically stated. However the PMF mapping extracts presented in the report shows there is minor PMF encroachment into the site from Crecent Street and no development is impacted. Depths are unlikely to be significant given the limited upstream catchment area. The Council mapping also indicates the PMF from A'Becketts Creek does not encroach into the site.	Revised Flod Risk Assessment Letter – Appendix EE
Environmental Impacts (Contamination) Provide further clarification of the proposed cap and contain approach to on-site contamination. In particular: a) clarify whether the Remedial Action Plan (RAP) preferred mitigation measure is to cap the entire site, part of the site or provide containment cells, noting the RAP identifies Areas of Concern (AoC), however do not cover the entire site. b) the Department notes Council does not support the approach for site capping with soft landscape above. Please review in consultation with Council and provide amendments / mitigation measures (as necessary).	Douglas Partners confirmed the RAP currently establishes that all fill across the site requires management. Gas management is proposed per proposed structure. The soft capping remediation solution with some removal and then venting for lower CS rated LFG proposed is an accepted industry standard and considered appropriate by Douglas Partners for the assessed contamination risk, in accordance with EPA and other industry guidelines for remediation. Council has not provided any further details or rationale for the objection and non-support for the solution, noting full removal of all contaminated soil has been addressed in the submission and in summary is practically and financially unfeasible, as well as an unrealistic expectation given the extent of the contamination.	Revised Remedial Action Plan (RAP) – Appendix GG
Environmental Impacts (Water Management) Confirm the maximum annual volume of water take, demonstrate sufficient water entitlement and assess the proposal against the Aquifer Interference Policy and Framework 2012 (if applicable).	As nominated in the response to DCCEEW, since the estimated groundwater take is well below 3ML per year, a comprehensive assessment under the NSW Aquifer Interference Policy and framework (2012) is not required.	Hydrogeological Statement – Appendix QQ
Architectural Plans / Details Provide a plan showing the *Cumberland Local Environmental Plan 2021* (CLEP 2021) zone site boundaries overlaid with the footprint of all buildings, open spaces and public domain.	A plan has been prepared which shows the proposed footprint of all buildings, open spaces and the public domain overlaid with the Cumberland LEP 2021 zoning boundaries (Drawing No. CP-AR- -0-1115). This plan is provided for information only and shows that all buildings (Buildings 1-7) are located on land zoned R4 High Density Residential and MU1 Mixed Use.	Revised Architectural Plans – Appendix E
Clarify the location of the application southern site boundary with Crescent Street and whether the site boundary includes or excludes the SP2 zone land along Crescent Street, noting: a) the southern boundary line is inconsistently shown in the architectural plans and the Arboricultural Impact Assessment show the site as including the SP2 zone land. Update the drawings to consistently show the site boundary. b) if the site excludes the SP2 zone, clarify the ownership of the SP2 zoned land and provide landowner's consent.	The site boundary includes the land zoned SP2 Infrastructure (Local Road) along Crescent Street. All Architectural Plans have been updated to clearly show the SP2 zoned land within the site boundary. The proposed footpaths within the road reserve are to be constructed in accordance with Council's design standards and dedicated to Council.	Revised Architectural Plans – Appendix E

Summary of Issue Raised	Response	Reference / Appendix
c) if the site includes the SP2 zone, confirm the proposed footpaths within the road reserve would be constructed in accordance with Council's design standards and then dedicated to Council.		
Provide updated plans showing the layout of all floor levels for Buildings 1 to 7. Update the architectural plans to more clearly annotate car parking according to land-use user group and provide a schedule / table of car parking provision and tenure for each block (phase) for clarity.	All typical floor levels for Buildings 1 to 7 have been annotated and incorporated into the architectural drawing set. Additionally, the architectural plans have been updated to clearly annotate car parking spaces according to land-use user group. A schedule/table of car parking provision and tenure for each block (phase) has been included for clarity.	Revised Architectural Plans – Appendix E
Provide amended plans which address the Accessibility Review Report comments that Buildings 4, 5, 6 and 7 include non-accessible entrances in the current design. Also address Council's comments about the inappropriate use of chair-lifts and the dislocation of the lowest residential levels from adjoining footpaths.	The architectural plans have been amended to address the Accessibility Review Report and Council's comments. Any minor discrepancies that may remain will be resolved during the detailed design and construction certificate phases, in line with best standard practice.	Revised Architectural Plans – Appendix E
Confirm what the letter 'A' adjacent to residential windows represents on the architectural drawings (e.g. drawing DA-1-2207).	The annotation 'A' represents a visual representation of the awning window locations.	Revised Architectural Plans – Appendix E
Provide a photomontage / CGI indicating the height relationship between the ground floor cmmercial unit within Building 4 (150 m²) and the immediate public domain / access to demonstrate the unit is appropriately and visually linked to the public domain.	A photomontage/CGI has been provided to indicate the height relationship between the ground floor commercial unit within Building 4 (150 m²) and the immediate public domain/access. The general park and ground level in Stage A have been reduced to RL 13.00. This level relation can be read in conjunction with the ground floor plans to demonstrate that the unit is appropriately and visually linked to the public domain.	Revised Architectural Plans – Appendix E
Other Matters Demonstrate whether the proposed kiosk adjacent to the Building 1/2/3 podium and the eastern end of the public open space complies with the requirements of clause 5.4(6) of the CLEP 2021.	The use and function of the kiosk located at the ground floor (to the west of Building 2) is to sell food, light refreshments and other small convenience items. The retail kiosk has been reduced in area to comprise a total GFA of 49 m². This complies with Clause 5.4(6) of the Cumberland LEP 2021.	Revised Architectural Plans – Appendix E
The EIS (p74) states that subdivision does not form part of this application, and no subdivision plans have been submitted. However, the EIS (p18) also states that the application proposes new easements and would extinguish existing easements as part of SSD. Clarify whether subdivision or amendments to easements are proposed as part of this application.	There are no amendments to existing easements or subdivision plans proposed as part of this application. Should this SSD be approved, the applicant would welcome a condition of consent requiring the following: ▪ Any existing easements, covenants or restrictions affected by the new development are to be released or varied prior to the issue of any Occupation Certificate. ▪ A separate application must be made to Council or a Registered Strata Certifier to obtain approval of the Strata Plan and issue of a Strata Certificate under the *Strata Schemes Development Act 2015*. ▪ The creation of any easements or documentary Positive Covenants registered on Title are to be created prior to the issue of an Occupation Certificate.	N/A

Summary of Issue Raised	Response	Reference / Appendix
Clarify the proposed number of construction and operational jobs, noting the Estimated Development Investment predicts 428 construction jobs and no operational jobs while the EIS (p40 and p205) suggested 428 or 2,500 construction jobs and 1,000 operational jobs.	The mixed-use nature of the development, combining residential, commercial, and recreational spaces, aligns with the vision of supporting employment opportunities in Cumberland. The proposal supports growth in employment opportunities in Cumberland - the project is estimated to generate approximately 366 direct construction jobs per annum over a 15-year delivery program, and around 321 ongoing operational jobs within the retail and commercial components once the development is occupied.	Revised Estimated Development Cost (EDC) Report – Appendix I
State Design Review Panel (SDRP)		
A summary of the advice and recommendations from the post-lodgment design review session held on 6 March 2025 is set out below. With the adjacent transport corridors, the site is acknowledged as being particularly challenging. While there have been some improvements following the last session, there are still significant concerns that the ground level interfaces are likely to result in poor CPTED outcomes. Greater resolution and rationalisation of the streetscape, internal roads and multi storey carpark is required to improve the design quality, legibility and activation of the proposal. The following commentary provides advice and recommendations for the project. **Connecting with Country** ▪ The development ensures that the Aboriginal community is welcomed, focusing on their arrival, journey through the site and their use of the space. ▪ The designing with Country elements will be resolved and identify where there are opportunities for co-design during later stages. ▪ An understanding of Country is being realised in the open space areas and along Crescent Street. ▪ Opportunities to heal Country through improvements to A'Becketts Creek could be realised, noting the coordination required with other landowners. ▪ Public art will be incorporated with the local indigenous community, noting that the Connecting with Country report's design recommendations identify the need for this to be more than murals.	The development ensures that the Aboriginal community is welcomed, with a focus on their arrival, movement through the site, and ongoing use of the spaces provided. The amended design continues to evolve in response to feedback received from Elders, embedding cultural narratives within the landscape and built form. This is expressed through the careful selection of vegetation, materials, and spatial arrangements that reflect geological and cultural connections to Country. These design responses aim to create places of meaning and recognition, ensuring that Aboriginal community members feel welcomed on arrival and supported in their journey through the site. Designing with Country elements are resolved in the RTS Package (Arcadia, 2025) and the Connecting with Country report updated (Artefact, 2025). Opportunities for co-design in later stages are identified in the original Connecting with Country report (Artefact, 2025) submitted as a part of the SSD. An understanding of Country is integrated into the new access way from Crescent Street up to the new retail precinct. Level improvements have made this experience more physically and visually accessible, with integrated Connecting with Country acknowledgements along the walk. A'Becketts Creek is a Council-managed asset. While direct improvements are outside the scope of this development, we are committed to engaging with Council to explore opportunities for complementary initiatives. Through this process, we aim to support Connecting with Country principles by aligning any adjacent works on our site with broader creek restoration. Indigenous public art opportunities are focused on proposed structures such as the bridge, BBQ shelter, and play structure. These will be developed further in collaboration with the local Indigenous community to ensure outcomes extend beyond murals and reflect Connecting with Country design principles.	Chapter 06.03, 07.05, 08.05, 08.21 of Revised Design Report – Appendix F Revised Architectural Plans – Appendix E Updated Connecting with Country Cover Letter – Appendix L Revised Landscape Design Report – Appendix J

Summary of Issue Raised	Response	Reference / Appendix
Site Strategy and Landscaping The public domain and ground floor interfaces require more detailed analysis to demonstrate that the challenging aspects of the site have been resolved. Provide greater clarity on the anticipated use of these spaces and improve the legibility of these uses through the design. ▪ Revise the design of Park Lane and adjacent landscape so that: – The shared zones are less defined by vehicle use, noting that beyond the carpark entrances these areas are described as prioritising pedestrians. – The hierarchy of uses (e.g. pedestrian, vehicles, active transport) is clearly communicated through the materiality and the relationship between roads, footpaths and landscape buffers. – There is a clearer relationship between the fluid landscape elements and the geometry of the road. – The character of the lane is clearly defined as a road within a park setting.	The landscape design has been further refined through the strategic use and placement of endemic planting, defining key building entries, creating a welcoming arrival experience, and acting as a unifying element for community life. Along Park Lane, the design references organic forms while maintaining a consistent material palette that enhances pedestrian walkability and is complemented by vegetation drawn from the Cumberland Plain geology. This principle extends across the precinct, with improved treatment of Crescent Street frontages, the north-facing courtyards in Stages B and C, retail colonnades, and the main site entries. In each of these locations, the emphasis is placed on the pedestrian experience, reinforcing legibility, comfort, and a strong connection to landscape and place.	Chapter 06.03, 07.05, 08.05, 08.21 of Revised Design Report – Appendix F
▪ Revisit the need for the parking provided by Crescent Lane in favour of a generous plaza that links the retail spaces with the public open space. If retained: – Minimise the fragmentation between the retail space and the park by reducing the extent of the Lane as much as possible by reducing car spaces, testing alternative driveway arrangements and turning options. – Refine the approach to materiality, kerbs and minimise design elements that separate the building from the park.	The amended design of the Ground level is guided by three key strategies which aim to connect the park with the retail spaces: 1. Visual connectivity - Establishing clear sight lines from the retail main entry towards the park. 2. Pedestrian Friendly - Ensuring unobstructed pedestrian movement throughout the retail frontages. 3. Material connectivity - A consistent material palette that ties together the retail colonnade, footpaths, and park edges, reinforcing a cohesive identity. Refer to the Landscape drawings. Crescent Lane has been designed as a shared zone, with seamless transitions between the roadway and adjacent footpaths achieved through minimal level changes. This approach enhances accessibility and encourages smooth pedestrian movement. In addition, the material palette across the Ground Level has been applied consistently and with clear intent to reinforce cohesion throughout the public realm. Refer to the Landscape drawings The parking is provided partially to service the adjacent supermarket.	Chapter 05.02, 05.05, 07.01 Revised Design Report – Appendix F
▪ The proposed café pavilion is a promising addition to the public domain but it's location, entrance and back of house areas need further development with regard to its proximity to Crescent Lane and with an understanding of how people will move through the space.	The proposed kiosk serves as a focal point to draw pedestrians from the retail colonnade into the park, while also creating a natural gathering space for those arriving from the park or the north-eastern corridor. The landscape design has been further developed with the kiosk location in mind, introducing ancillary pathways that guide movement around the kiosk, towards the park, and ultimately to the future bridge connection. Refer to the Landscape drawings.	Chapter 05.01, 07.01, 07.22 of Revised Design Report – Appendix F Revised Landscape Report – Appendix J
▪ Ensure that the proposed location of canopy cover is considered with respect to the proposed uses (e.g. providing shade to the senior's gym).	Tree placements adjacent to key outdoor uses, including the seniors gym, have been reviewed and updated to ensure appropriate canopy coverage for the proposed use.	Revised Landscape Report – Appendix J

Summary of Issue Raised	Response	Reference / Appendix
The interface between Park Lane and the townhouse apartments to its south could be improved. ▪ Provide sections demonstrating the relationship between the apartment terraces, the footpath, the lane and the landscaping elements so that: – There is a softer interface between the footpath and the elevated terraces (e.g. providing landscape between the footpath and wall and using a mixture of solid wall / open balustrades within terrace level planting). – There is a more comfortable balance between the privacy needs of the apartment and passive surveillance from / to the public domain.	Sections are provided to illustrate and communicate the relationship between built form, landscape, and other elements of the public domain. The amended design delivers a softer, more engaging interface between footpaths and elevated terraces through the following strategies: • Landscape Transition – Courtyard frontages now include layered landscaping zones that step gradually from the shared pedestrian space to the private terraces, softening the threshold and improving visual amenity. • Reduced Wall Heights – Courtyard walls have been lowered from approximately over 2m to 1.8m to reduce bulk and improve openness, while still providing adequate privacy for ground-floor residents. The walls along the courtyards facing the park include a wall 1.5m high with a metallic palisade balustrade above. • Varied Treatments – A mixture of solid walls, open balustrades, and integrated planting at terrace level further break down the interface and introduce permeability. • Clear Differentiation – Building entries are emphasised with distinct treatments and adjoining green zones, creating legibility while ensuring courtyards retain their own landscape character. This approach achieves the SDRP's intent by softening the interface, strengthening the relationship with the public domain, and balancing resident privacy with an inviting, green street edge. The amended design achieves a more comfortable balance between resident privacy and passive surveillance of the public domain through: • Optimised Floor Levels – Residential ground floors have been carefully set relative to adjoining footpath levels to maintain natural surveillance while avoiding direct overlooking into private living spaces. • Landscape Mediation – Layered planting and low walls provide visual filtering, giving residents a sense of privacy without creating a hard barrier to the street. • Façade Design – A mix of solid and transparent elements (balustrades, screens, planting) allows sight lines to the public domain, ensuring safety and activation. • Visual Permeability – Entrances and communal spaces are designed with clear views to the street, reinforcing passive surveillance and community safety. The section drawings and 3D views demonstrate how these strategies are integrated into the design to balance privacy, surveillance, and an active public realm. This thoughtful design approach ensures a harmonious blend of private and public spaces, enhancing the liveability and safety of the community.	Chapter 08.17, 08.32 in Revised Design Report – Appendix F
The development's interface with Crescent Street requires further design resolution to ensure that the space is safe and welcoming to the community. ▪ Provide a strong landscape response between a series of well-designed entries and 'amenity nodes'. ▪ Improve the 'amenity nodes' relationship with adjacent uses and entrances so that they are less isolated from other areas of activation. ▪ Define possible future uses of the 'amenity nodes' to ensure that there is suitable passive surveillance and activation of Crescent Street and Crescent Lane.	The amended design strengthens the relationship between building entries and amenity nodes through a coordinated architectural and landscape strategy. Key measures include: • Reduction of Level Difference – The ground plane for Stage A and a portion of the park has been lowered from RL 15.00 to RL 13.00, creating a more seamless transition between the internal street and the park.	Chapter 05.01, 05.02, 05.05, 06.01, 07.03, 08.03 in Revised Design Report – Appendix F

Summary of Issue Raised	Response	Reference / Appendix
	• Enhanced Building Entries – Building entries are now highlighted with double-height volumes approximately 6 meters high, layered landscaping, and generous entry depths, creating a strong sense of address. • High-Quality Materials and Sight Lines – The use of high-quality materials and carefully framed sight lines connects entries directly with adjacent amenity nodes, ensuring legibility and welcoming spaces. This integrated approach ensures that building entries are legible, welcoming, and well-connected to the surrounding public domain. The amended design improves the relationship between amenity nodes and adjacent uses by integrating them more closely with pedestrian movement and active frontages. Key strategies include: • Proximity to Entrances – Amenity rooms along Crescent Street are positioned near building lobbies to ensure visibility and regular use. • Landscape Integration – Each node is framed by surrounding landscaping, softening edges and creating an inviting transition to adjoining public spaces. • Pedestrian Flow – Circulation routes have been designed to naturally connect amenity nodes with main access paths, ensuring these spaces are not isolated but instead embedded within daily movement patterns. These changes strengthen the role of amenity nodes as active, well-connected spaces within the precinct rather than stand-alone elements. Amenity nodes have been designed with flexibility to accommodate a variety of future resident and community uses, depending on community needs. Their strategic placement ensures that they are visible, easily accessible, and activated by everyday pedestrian movement. This design approach fosters passive surveillance and contributes to a lively and safe streetscape over time. This visionary design ensures a safe, welcoming, and vibrant interface with Crescent Street, enhancing community engagement and liveability.	
▪ Improve the clarity, hierarchy and wayfinding for the external stairs, by: – Testing different orientations, scales and locations so that they are clearly defined. – Ensuring secure access points. – Positively managing the interface between public and private spaces.	The amended design improves the relationship between amenity nodes and adjacent uses by integrating them more closely with pedestrian movement and active frontages. Key strategies include: 1. Proximity to Entrances – Amenity rooms along Crescent Street are positioned near building lobbies to ensure visibility and regular use. 2. Landscape Integration – Each node is framed by surrounding landscaping, softening edges and creating an inviting transition to adjoining public spaces. 3. Pedestrian Flow – Circulation routes have been designed to naturally connect amenity nodes with main access paths, ensuring these spaces are not isolated but instead embedded within daily movement patterns. These changes strengthen the role of amenity nodes as active, well-connected spaces within the precinct rather than stand-alone elements.	Chapter 05.05 in Revised Design Report – Appendix F

Summary of Issue Raised	Response	Reference / Appendix
Architecture The modulation of the built form and materiality has successfully improved the perceived bulk and scale of the towers. However, the proposed exceedance of the height plane through roof articulation is unconvincing and unjustified. This approach exacerbates the overshadowing of the southern dwellings, which are already significantly impacted. ▪ Modulate the floor to roof heights of the upper floor apartments to provide variation to the termination of the towers.	The amended rooftop design has reduced the extent of non-compliance with the LEP 30% uplift height plane. This has been achieved by simplifying and reducing rooftop articulation while maintaining the original design intent.	Chapter 07.02, 08.02 in Revised Design Report – Appendix F
The double floor retail /commercial façade of the north-eastern block requires further development. In revising the design, consideration should be given to the architectural treatment of the first-floor spandrel and how the façade may be utilised by future retail tenants. ▪ Test alternative solutions such as a secondary layer of awnings that would: – Help define the hierarchy of uses and provide greater legibility to the residential and commercial entry points. – Provide additional weather protection to outdoor food and beverage uses. ▪ Rationalise the exposed columns near the north-east corner of the site through appropriate design treatment (e.g. artwork / lighting).	All design entries have been designed with clear sight lines from their corresponding streets with weather protection. Stage A - Residential and commercial entries benefit from the colonnade along the podium frontages. In addition, an awning extending beyond the building footprint will improve weather protection of the podium western frontage. Stage B and C - Residential and amenity spaces are clearly identified using internal double height while also using awnings or slab edge profiles for weather protection. The amended design incorporates the following key refinements: 1. Building Extent: The overall footprint has been significantly reduced by improving the efficiency of the building layouts. 2.Structural Expression: As a result, the number of visible columns within the undercroft has been substantially minimized. 3.Undercroft Access: The redesigned undercroft is accessed via a gently graded ramp, framed by a rich landscape treatment that enhances amenity and user experience. Refer to landscape drawings.	Chapter 05.02, 07.05, 08.05 in Revised Design Report – Appendix F Chapter 07.10 in Revised Design Report – Appendix F
The architectural treatment of the above ground car parking facing Crescent Street is unlikely to be successful in consideration of the depth allowed for in plan and the need for protective measures, ongoing maintenance and cleaning. ▪ Simplify the design approach so that the architectural solution is a more honest representation of the use. ▪ Reduce the use of glass for the car parking facades and focus on improving the landscaping treatment for a solution that minimises environmental impact and is cost effective. ▪ Provide visualisations that accurately demonstrate the proposed character of the design.	▪ During the amended design phase, building footprints have been reduced proportionally to their corresponding locations. Podium masses and facades have been redesigned with more defined and consistent materials. ▪ The design has shifted away from glazed car park facades in favour of strengthening the landscape buffer. This treatment provides a greener, more integrated interface that softens the podium edges, enhances the public domain, and minimises environmental impact. ▪ The reduction in car park storeys has lessened the overall podium bulk. This has allowed landscape outcomes to be prioritised at ground level and along key frontages, improving the pedestrian experience and contributing to a cohesive, resilient precinct character. ▪ Visualisations have been incorporated in each stage chapter to accurately demonstrate the proposed character of the design. ▪ This streamlined approach ensures a practical, cost-effective solution that enhances the community's interaction with Crescent Street.	Chapter 07.01, 07.10, 08.01, 08.07, 08.19, 08.23 in Revised Design Report – Appendix F

Summary of Issue Raised	Response	Reference / Appendix
After the session, the following advice was provided. The visual impact of the above ground parking is not supportable in its current form. Further work should be undertaken to reduce its bulk and scale. ▪ The number of car spaces within the development should be reduced to the minimum requirements, noting that the affordable housing bonus is predicated on access to other modes of travel. ▪ Test alternative car parking layouts to improve the efficiency of the car park in order to reduce the built form. ▪ Pursue alternative solutions to private car parking (e.g. providing car share opportunities within the development).	The proposed parking provision of 1568 car parking spaces has been set below the LEP maximum allowances of 2036 spaces, reflecting the approved planning framework for the site and the outcomes of the consultation process with TfNSW. While not at the maximum permitted level, the supply is considered appropriate given the scale and character of the development. Importantly, the SEPP minimum rates totalling 1413 spaces have been assessed as unsuitable for this site due to its unique context. The resulting provision delivers a balanced outcome, supporting resident needs while remaining consistent with strategic transport and land-use objectives. Two dedicated car share spaces are also now included within the development to provide alternative transport options for residents and reduce reliance on private car ownership. The car parking layout has undergone a fundamental redesign, delivering a significant improvement in both efficiency and urban design outcomes. Through extensive testing of alternative configurations, the podium mass has been significantly reduced, with car parks in Stages B and C consolidated from seven levels down to just four. This reduction materially improves the relationship between podiums and the street by lowering bulk and enabling more generous landscaped rooftop areas. The outcome is a leaner, more efficient structure that enhances amenity, reduces visual impact, and strengthens the overall integration of the development with its public domain setting. This approach ensures a practical, efficient, and visually appealing solution that aligns with the community's needs and strategic objectives.	Chapter 05 in Revised Design Report – Appendix F
The proposed design is required to demonstrate how it meets the objectives of the ADG. ▪ Review the apartment layouts sleeving the above ground car parking and demonstrate how the circulation areas backing onto the carpark meet Objective 4F-1 of the ADG by: – Optimising access to natural light and ventilation. – Providing wider corridors. – Creating break out spaces to encourage incidental social interactions.	All residential apartments sleeving the car park levels are designed with wide corridors and direct access to natural sunlight. Stage A: The apartments sleeving the carpark frontage are separated by a generous building slot, which introduces abundant daylight and establishes clear sightlines toward both the shared-zone road and the park's outdoor areas. Stage B: The car park levels adopt a more efficient layout, incorporating ample openings through strategically placed building slots to enhance ventilation, sunlight penetration, and visual permeability. Stage C: The sleeved apartments are connected by long corridors that integrate building slots, ensuring clear views toward the park while allowing increased access to natural sunlight throughout the circulation spaces. Lastly, all carpark include facade articulation to allow access to natural ventilation	Revised Design Report – Appendix F
▪ Demonstrate that visual privacy between apartments meets Objective 3F-1 of the ADG, particularly where separation distances between towers deviate from the guidance.	The amended floor plate layouts have been reconfigured to improve efficiency while also generally achieving the intent of the Apartment Design Guide (ADG) Objective 3F-1 on visual privacy. Building separation distances have been maintained or improved in most locations, reducing opportunities for overlooking and enhancing residential amenity. Updated plans (refer Drawing CP-AR-0-1103) and the accompanying ADG compliance tables confirm that the revised design addresses privacy, solar access and cross-ventilation within a high-	Chapter 10 in Revised Design Report – Appendix F

Summary of Issue Raised	Response	Reference / Appendix
	density context. Where minor variations remain, measures such as façade articulation, window orientation and landscaping have been incorporated to mitigate potential impacts and ensure a high level of amenity is provided.	
▪ Reduce the reliance on mechanical ventilation to habitable spaces by providing passive acoustic mitigation (e.g. providing narrow balconies to habitable spaces adjacent to traffic corridors).	The amended floor plate layouts have been refined to reduce reliance on mechanical ventilation by embedding passive acoustic mitigation strategies. Habitable rooms adjacent to traffic corridors and their conditions now incorporate design measures such as narrow balconies and optimised room orientation to buffer noise and allow for natural ventilation. These strategies ensure compliance with acoustic performance standards while improving resident amenity and sustainability outcomes by minimising energy demand for mechanical systems.	Chapter 10 in Revised Design Report – Appendix F
Fire and Rescue NSW (FRNSW)		
FRNSW have reviewed the EIS and other submitted documentation. FRNSW submit no comments or recommendations for consideration, nor any requirements beyond that specified by applicable legislation at this stage.	Noted.	N/A
Sydney Trains		
We have reviewed the proposal and advise that in order to protect rail land, assets, operations, and to ensure a safe and reliable rail service, it is requested that the Department consider imposing the conditions as listed in Attachment A. It is requested that these conditions remain as worded and are not amended without consultation with TfNSW (as Rail Authority). Where additional information is provided, including as part of any Response to Submissions or where any amendments are made to the proposal, we request notification from the Department in the event these changes may impact the outcome of this letter.	Noted.	N/A
Transport for NSW (TfNSW)		
Road Widening of Crescent Street and Traffic Signal Works at Woodville Road <u>Comment:</u> TfNSW notes that as part of the proposal Crescent Street will be widened to provide 3 approach lanes in Crescent Street at the traffic control signals (TCS) with Woodville Road (classified road) which is consistent with the Planning Proposal and requires modifications to the existing traffic signal layout which requires separate TfNSW approval under section 87 (4) of the *Roads Act, 1993*. TfNSW is of the view that on road safety grounds, the proposed length of the road widening on Crescent Street should be designed as follows: ▪ three lane eastbound arrangement in Crescent Street commencing east of the eastern driveway with Crescent to Woodville Road ▪ two lane eastbound arrangement in Crescent Street commencing east of the western driveway up to the eastern driveway.	The third lane will be a parking lane up until the eastern driveway. This has been clarified in the response to submissions documentation which clarifies the layout of the intersection. The design has been adopted as part of the previously issued road widening package. Any required changes to traffic signal or lighting plans are outside the scope of the BG&E road widening package. These works will be carried out in accordance with TfNSW requirements and will be subject to a separate approval under section 87(4) of the Roads Act 1993, which may involve a broader redesign of the Crescent Street / Woodville Road intersection to suit the new kerb alignment. BG&E road design issued on 03.04.25 incorporates TfNSW eastbound lane comments.	Revised Transport Impact Assessment – Appendix P
<u>Recommendation:</u> TfNSW recommends the following condition to be included in any Development Consent issued by the Department:	Noted – The applicant accepts the proposed condition.	N/A

Summary of Issue Raised	Response	Reference / Appendix
▪ The proposed Traffic Control Signal upgrade at the intersection of Woodville Road / Crescent Street and associated road widening of The Crecent shall be designed to meet TfNSW requirements. The Traffic Control Signal (TCS) plans shall be drawn by a suitably qualified person and endorsed by a suitably qualified practitioner. ▪ The submitted design shall be in accordance with Austroads Guide to Road Design in association with relevant TfNSW supplements (available on https://roads-waterways.transport.nsw.gov.au/business-industry/partnerssuppliers/document-types/supplements-austroads-guides/road-design.html). The certified copies of the TCS design and civil design plans shall be submitted to TfNSW for consideration and approval prior to the release of a Construction Certificate and commencement of road works. ▪ Please send all documentation to development.sydney@transport.nsw.gov.au. TfNSW fees for administration, plan checking, civil works inspections and project management shall be paid by the developer prior to the commencement of works. ▪ The developer will be required to enter a Works Authorisation Deed (WAD) for the abovementioned works.		
Proposed Driveways in Crescent Street <u>Comment:</u> TfNSW note that there are two driveways proposed in Crescent Street for vehicular access (i.e. western and driveway driveways). TfNSW raises road safety and traffic flow concerns with the proposed eastern driveway in Crescent Street, which is located on a bend near Woodville Road and permits all turning movements into and out of the site. TfNSW is concerned with potential queuing of the right turn bay extending out of the bay and potentially impacting on the operation of the right turn into Crescent Street from Woodville Road, which has been recently constructed by TfNSW. TfNSW raises road safety concerns relating to the turning movements at the eastern driveway. Vehicles turning right into the driveway from Crescent Street are required to turn across 3 opposing traffic lanes uncontrolled from a short right turn bay and vehicles turning right out the site are required to turn across 5 opposing lanes.	The eastern driveway has formed part of development proposals since the commencement of site planning in 2015 and which has formed the base of all traffic modelling scenarios that supported the rezoning of the land. It is not considered that concerns regarding the operation of this access on the traffic network as well as potential safety matter are not warranted for the reasons set out below: ▪ The upgrade of Crescent Street will provide two through lanes and a parking lane eastbound. The traffic modelling indicates that there would be low delays and adequate gaps in traffic to allow vehicles to turn right out of the development. The concerns about the operational impacts of the driveway have been addressed in the previous modelling that was undertaken and presented in the SSDA Traffic and Transport report. The driveways were modelled both in Sidra 9 and Aimsun. This modelling has been undertaken in consultation with Transport for NSW as part of the planning proposal for the site. ▪ The minimum sight distance requirement of 45m for a speed limit of 50km/h is achieved as per AS2890.1. Sight distances are shown in Figure 3.2 of the TTPP report. The proposed location of the driveway is located further east of the existing driveway and would allow for adequate sight distance in both directions. Further traffic from the east would be travelling relatively slowly as they negotiate the curves and the turn from Woodville Road, some 90m to the east.	Revised Transport Impact Assessment – Appendix P
<u>Recommendation:</u> TfNSW recommends that the access arrangement be amended, as part of the Response to Submissions (RtS) as follows: ▪ Restrict traffic movements at the eastern driveway in Crescent Street by providing a self-enforcing, left in/left out arrangement with all right turn movements into the development from Crescent Street being permitted only from the western driveway. ▪ Adjustments to the internal street arrangement so that all traffic turning right into the site can access the car parking spaces from the western driveway. This may require an extension of the right turn bay proposed at the western driveway to accommodate the volume of right turning traffic generated by the development.	This recommendation is not supported for the reasons set out above. The requirement to restrict traffic movements to the eastern driveway would have significant impacts on the functionality and staging noting that the eastern driveway supports all of the retail/commercial traffic movements and more than 50% of the traffic movements for the residential apartments (buildings 1, 2 and 3). Stage A will be developed prior to Stage B, meaning the internal Western road will not be constructed at the same time as the internal Eastern road. In this context, imposing a left-in/left-out only restriction from Crescent Street would be impractical for the initial phase of development.	Revised Transport Impact Assessment – Appendix P

Summary of Issue Raised	Response	Reference / Appendix
	Such an arrangement would significantly increase traffic in the Internal Street fronting the park and significantly impact the quality of this environment and the overall design intent which is to limit the majority of vehicle traffic to the edges of the site. Traffic modelling has shown that right turns into the eastern driveway will be acceptable and not queue back beyond the proposed turn bay.	
Proposed Shuttle Bus Comment: During the Planning Proposal for the rezoning of the site, TfNSW raised concerns regarding the traffic generation of the site and the impact on the classified road network given that the site is not located near public transport and as such, future residents would be forced to rely upon private vehicle use. To address the traffic impacts, the Applicant proposed the use of shuttle bus services between the site, Harris Park and Parramatta train stations. In the '*Response to submissions report and recommendation for finalisation of the Planning Proposal at 1 Crescent Street, Holroyd*' dated 22nd February 2022, the applicant advised that they were committed to the provision of the shuttle bus with the funding and operation arrangements described as follows: ▪ In response to the shuttle bus as part of the solution put forward, TfNSW raised concerns around the proponent's long-tern commitment to the provision of this service at the meeting on 23 November 2021. ▪ The proponent has responded with the following commitment (correspondence dated 30 November 2021, Attachment H4). TfNSW have responded on this matter (set out in section 6.5.4 of this report. – *"The proponent is committed to establishing an arrangement that would allow for the initial set up and funding of a shuttle bus to operate from the site as being one of a number of mechanisms to support improved accessibility and reduced private car reliance. The precise details of the arrangements would be confirmed but it would contain the following principles*: • *Developer to fund upfront capital costs for set up upon delivery and occupation of the initial stage(s) of the development.* • *Developer to fund operational costs for a period of 3 years post first OC, while stages of the project are incrementally delivered.* • *Body Corporates of the residential towers, as well as the owners of the retail/commercial component, to support on-going funding to be conditioned via development consent and incorporated into the body corporate/strata committee by-laws.* • *It is proposed that such requirement would form part of the final DCP to be prepared for the site and approved by Council, at which point it would become conditions or relevant future development consents."* Whilst the traffic report proposes the use of **a** shuttle bus, the traffic report states that '*This shuttle bus service has been provided with the provision of a bus bay and costs shared between body corporates in the development*'. TfNSW raise concerns about the longevity of the provision of the shuttle bus (which needs to be provided in perpetuity to mitigate the traffic impacts of the development) if it is under the control of a body corporate, as the decision to fund/operate or abandon the shuttle bus service would be reliant on the body corporate by laws.	The Transport Impact Assessment (TTPP, September 2025) recommends the provision of a privately funded shuttle bus service linking the site with Harris Park and Parramatta Stations as part of the Green Travel Plan. Frequency: ▪ End State - The shuttle bus will operate every 15 minutes during peak periods (6:30-9:30am and 4:00-7:00pm, Monday to Friday) using two buses providing direct services between the site and Parramatta Station. During off-peak daytime and weekends, the shuttle will operate every 30 minutes using a single bus on a loop connecting the site, Harris Park Station and Parramatta Station. ▪ Interim State - From completion of the first phase until completion of the second phase of the development, the shuttle service will operate with a single bus covering both peak and off-peak periods, providing 30-minute services on a loop connecting the site, Harris Park Station and Parramatta Station. The uplift to the end-state two-bus service will occur once sufficient resident population and non-residential uses are established. ▪ Service levels will be subject to ongoing review as part of the Green Travel Plan monitoring framework to ensure alignment with demand. ▪ Service levels will be subject to ongoing review as part of the Green Travel Plan monitoring framework to ensure alignment with demand. Set Down Locations: ▪ Parramatta Station – George Street shuttle bay adjacent to the station interchange (public bus set-down area currently used by private shuttles). ▪ Harris Park Station – Station Street near the pedestrian entrance to the station. ▪ These locations are within existing transport interchanges and will be confirmed with Council/TfNSW at the detailed design stage.	Revised Transport Impact Assessment – Appendix P

Summary of Issue Raised	Response	Reference / Appendix
Recommendation: TfNSW requests further information, in the RtS, on mechanisms or potential conditions that could be imposed to ensure that the shuttle bus is privately funded and operated in perpetuity as required to mitigate the traffic generated from the development.	The proponent accepts a condition of consent requiring the shuttle bus service to be funded and operated privately by the development (including successors in title) for the life of the project. ▪ The shuttle bus will form a mandatory element of the Green Travel Plan, which is enforceable and subject to regular review. ▪ Funding and operation will be incorporated into the Owners Corporation budget / building management structure, ensuring it is maintained on an ongoing basis in the same way as private waste collection or building services.	Revised Transport Impact Assessment – Appendix P
Construction Pedestrian and Traffic Management Plan (CPTMP) Comment: TfNSW raises concerns with the impact of construction vehicle traffic on the surrounding transport network. Recommendation: TfNSW recommends the following condition to be included in any consent issued by the Department: ▪ Prior to the issue of any construction certificate, the applicant shall prepare a Construction Pedestrian and Traffic Management Plan (CPTMP) in consultation with TfNSW. The CPTMP needs to specify matters including, but not limited to, the following: – To mitigate the impact of construction traffic and reduce interaction with other projects, all access to the site shall be provided from Crescent Street only. – Proposed haulage routes and construction vehicle access arrangements. – Predicted number of construction vehicle movements, detail of vehicle types and demonstrate that proposed construction vehicle movements can be accommodated within the context of road changes in the surrounding area. – Identify any potential impacts to general traffic, cyclists, pedestrians, and bus services within the vicinity of the site from construction vehicles during the construction of the proposed works. – Identify the cumulative construction activities of the development and other projects within or around the development site. – Proposed measures to minimise the cumulative impacts on the surrounding road network should be clearly identified and included in the CPTMP. – Construction program and construction methodology, including any construction staging. – Consultation strategy for liaison with surrounding stakeholders and other developments under construction. – Details of crane arrangements including location of any crane(s) and crane movement plan. – Proposed construction hours. – A detailed plan of any proposed hoarding and / or scaffolding. – Provide the direct contact details to businesses and residents impacted by the construction work and TfNSW via development.ctmp.cjp@transport.nsw.gov.au to resolve issues during construction in real time. The applicant is responsible for ensuring the builder's direct contact number is current during any stage of construction; and	Noted – A Construction Pedestrian and Traffic Management Plan (CPTMP) will be prepared in consultation with TfNSW prior to the issue of any relevant Construction Certificate. For clarity, each CPTMP will relate only to the scope of works authorised under that Construction Certificate, so that construction traffic and access arrangements can be appropriately tailored to the staging of the development.	N/A

Summary of Issue Raised	Response	Reference / Appendix
– Submit a copy of the final plan to TfNSW for endorsement via development.ctmp.cjp@transport.nsw.gov.au.		
NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW)		
NSW DCCEEW Water Group has reviewed the Environmental Impact Statement and has recommendations regarding water supply, take and licensing. Please see below for more detail. **Water Supply, Take and Licensing** Recommendation – Pre-Determination That the proponent quantifies the maximum annual volume of water take due to aquifer interference activities and demonstrates the ability to acquire sufficient water entitlement unless an exemption applies. Explanation Insufficient information has been provided to confirm the potential groundwater inflow volumes. NSW DCCEEW Water Group notes that the groundwater table will potentially be intercepted. Maximum excavation depths for this project are up to 1.5m. The quoted data indicate that groundwater will be deeper than the deepest excavation, however there is commentary regarding seepage while piling and seepage of perched groundwater. The proponent has not presented sufficient information and analysis on inflows during the construction and ongoing operation of the site. Quantification of maximum potential inflow volumes is required.	Based on the groundwater monitoring data and site conditions assessment, the maximum annual volume of groundwater take due to aquifer interference activities is estimated to be well below 3ML/year. The assessment indicates that groundwater levels across the site vary between RL 6.2m and RL 11.2m AHD, with average levels between RL 6.3m and RL 10.9m AHD. The deepest proposed excavations are for OSD tanks and lift pits at RL 11.0m AHD and RL 9.8m AHD respectively, with average groundwater levels mostly below these designed levels. The site comprises clayey fill with very low hydraulic conductivity (1E-9 to 1E-7 m/s), making significant water seepage negligible and manageable through standard sump and pump methods.	Hydrogeological Statement – Appendix QQ
Recommendation – Post-Approval The proponent should ensure a water access licence (WAL) is obtained to account for the maximum predicted water take for construction and operation activities unless an exemption applies under the *Water Management (General) Regulation 2018*. Explanation Under the *Water Management Act 2000*, if groundwater is intercepted a WAL must be obtained prior to any water take occurring unless an exemption under Clause 7 of Schedule 4 of the *Water Management (General) Regulation 2018* applies. An exemption may be available if water take is less than or equal to 3 ML per water year, subject to the development meeting other exemption requirements, such as: ▪ the water is not taken for consumption or supply; ▪ the person claiming the exemption keeps a record of the water taken under the exemption and provides this to the Minister within 28 days of the end of the water year; and ▪ the records are kept for 5 years. Further information on these requirements and other information on licensing and approvals and exemptions, including a form to report and record water taken can be found at: https://water.dpie.nsw.gov.au/licensing-and-trade and https://water.dpie.nsw.gov.au/our- work/licensing-and-trade/water-access-licences-and-approvals/exemptions-for-water- licences-and-works-and-or-use-approvals.	The development is anticipated to qualify for the Water Access License exemption under Clause 7 of Schedule 4 of the Water Management (General) Regulation 2018, pending DCCEEW approval. This exemption is applicable due to the estimated groundwater take being significantly below the 3ML per water year threshold. To maintain compliance with exemption requirements, the proponent will be responsible for maintaining accurate records of water taken and submitting these to the Minister within 28 days of the water year's conclusion, with records to be retained for a period of 5 years. It is worth noting that the development will not necessitate permanent dewatering measures.	Hydrogeological Statement – Appendix QQ
Groundwater Impacts and Dewatering Requirements Recommendation – Pre-Determination If the take of groundwater is found to be greater than 3 ML per year, the proponent must assess the impacts due to aquifer interference activities in accordance with the NSW Aquifer Interference Policy and framework (2012). These documents are available at:	Since the estimated groundwater take is well below 3ML per year, a comprehensive assessment under the NSW Aquifer Interference Policy and framework (2012) is not required. The risk of significant water seepage during bulk and localised excavations due to aquifer interference is considered negligible based on the subsurface conditions and groundwater levels. Construction impacts will be minimal, with any seepage manageable by standard sump and pump methods, and the use of watertight OSD and lift pit structures will prevent operational impacts. Continuous	Hydrogeological Statement – Appendix QQ

Summary of Issue Raised	Response	Reference / Appendix
▪ https://water.dpie.nsw.gov.au/__data/assets/pdf_file/0005/151772/NSW-Aquifer- Interference-Policy.pdf ▪ https://water.dpie.nsw.gov.au/__data/assets/pdf_file/0007/171097/Aquifer- Interference-Assessment-Framework.pdf Explanation Although groundwater take is not anticipated to be significant, as per Recommendation 1.1 above, the EIS has not provided a volumetric quantification of groundwater take. Additionally, the EIS has not provided an assessment of impacts to groundwater due to construction or operation of the project. Although a comprehensive groundwater study prior to determination is unnecessary given the perceived low level of risk, NSW DCCEEW Water Group notes that without groundwater take estimations it is difficult to assess the level of risk. Therefore, the proponent should determine the estimated take volume.	groundwater monitoring has been established with five data loggers installed for a minimum three-month period to better understand long-term groundwater fluctuations and this data will be used in the Water Access License Exemption application.	
Sydney Water		
Sydney Water has reviewed the application based on the information supplied and provide the following comments to assist in understanding the servicing needs of the proposed development. A Feasibility application was lodged with Sydney Water under case number 216725 (CN216725). An Advice Letter was issued on 19 February 2025. **Critical Assets** Numerous critical wastewater trunk oviform assets (A'Becketts Creek Submain) traverse the north-west and northern portions of the site. An Out of Scope Building Plan Approval will be required. Condition assessments of these assets must be undertaken in accordance with Sydney Water's Specialist Engineering Assessment Procedure requirements (Specialist engineering assessment procedure D0001870).	The proponent has engaged Rose Atkins Rimmer Infrastructure who is a suitably qualified Water Services Coordinator. An Out-of-Scope Building Plan Approval has been confirmed as required and will be undertaken in accordance with Sydney Water's Specialist Engineering Assessment Procedures. This process will be directly coordinated with Sydney Water.	N/A
Water Servicing ▪ The development is located within the Ryde Gravity Water Supply Zone (WSZ). Our preliminary assessment indicates that the current system has capacity to service the development. ▪ Amplifications, adjustments, deviations and/or minor extensions may be required. ▪ Detailed requirements will be provided at the Section 73 application stage.	Noted – no action required.	N/A
Wastewater Servicing ▪ The development site is located in the Holroyd SCAMP. ▪ This property is currently connected to the wastewater network via Maintenance Hole 1372004 (MH 1372004). **MH 1372004 must remain the connection point for the development.** This connection point currently has sufficient capacity to service the development. ▪ Sydney Water understands a concept wastewater servicing strategy has been provided under *Appendix JJ Infrastructure & Staging Report*. **The applicant and their Water Servicing Coordinator must liaise with their Sydney Water case manager under CN216725 or via an Anticipated Section 73 application to identify a suitable wastewater servicing strategy for the site**.	Noted – no action required.	N/A
Growth Information Sydney Water supports government-backed growth initiatives within our area of operations, striving to provide timely and cost-effective water and wastewater infrastructure without undue impacts. To offer robust servicing advice and	Noted – no action required.	N/A

Summary of Issue Raised	Response	Reference / Appendix
investigate staged servicing possibilities, we require the proponent to provide **anticipated ultimate and annual growth data** for this development as outlined in the enclosed Growth Data Form.		
Should the Department decide to progress with the subject development application, Sydney Water would require the following conditions be included in the development consent. ▪ Section 73 Compliance Certificate ▪ Building Plan Approval Further details of the conditions can be found in **Attachment 1.** ▪ **The proponent and their Water Servicing Coordinator must liaise with their Sydney Water case manager under CN216725 or via an Anticipated Section 73 application to identify a suitable wastewater servicing strategy for the site.** ▪ The proponent should complete and return the enclosed Growth Data Form as part of their Section 73 application. The Growth Data Form should be updated promptly with Sydney Water in case of changes. ▪ The Department is advised to forward the enclosed *Sydney Water Development Application Information Sheet (for proponent)* to assist the proponent in progressing their development. This Info Sheet contains details on how to make further applications to Sydney Water and provides more information on Infrastructure Contributions. This advice is not formal approval of our servicing requirements. Detailed requirements, including any potential extensions or amplifications, will be provided once the development is referred to Sydney Water for a Section 73 application. More information about the Section 73 application process is available on our web page in the Land Development Manual.	Noted – no action required.	N/A
Heritage NSW		
The Aboriginal Cultural Heritage Assessment Report (ACHAR) has been prepared with reference to the relevant guidelines as required by the Secretary's Environmental Assessment Requirements (SEARs). The ACHAR outlines that no Aboriginal objects or areas of archaeological potential were identified within the study area and that no Aboriginal cultural heritage values will be impacted by the proposal. Heritage NSW agrees with the proposed management recommendations (Section 8 of the ACHAR), though provides the following comments: ▪ The ACHAR contains discrepancies in the total number of Registered Aboriginal Parties (RAPs) recognised for the project. We note, for example, that Darug Custodians is listed twice in Table 2 (List of registered Stakeholders), while Tab 3 in Section 2.1.4 (Proposed assessment methodology) includes responses from two parties (including Pearl Depoma and Kayelene Terry/Bariyan Cultural Connections) who are not listed as RAPs for the project in Table 2. ▪ Further, an email correspondence between Artefact Heritage and Environment Pty Ltd and Jesse Johnson included in the consultation appendix (email dated 11 January 2024) indicated that this individual was to be included in the consultation process despite the late registration. We note, however, that this party has not been included in the list of RAPs in ACHAR and has not been provided with Stage 4 consultation. Please provide clarification regarding this discrepancy and ensure that the list of RAPs is accurate and complete for any future consultation regarding the project.	Table 2 (List of registered Stakeholders) has been updated by Artefact with the following details. 1. The duplication of Darug Custodians has been resolved. 2. Pearl Depoma has been added 3. Kayelene Terry - Bariyan Cultural Connections has been added 4. Jesse Johnson - Murgadi Heritage Indigenous Corporation has been added. The final version of the ACHAR was provided to Jesse Johnson - Muragadi Heritage Indigenous Corporation on 25 March 2025. Our email has stated the oversight and that any comments received from Muragadi will be incorporated into the ACHAR.	Revised ACHAR – Appendix M

Summary of Issue Raised	Response	Reference / Appendix
▪ Heritage NSW notes that the Aboriginal Heritage Information Management System (AHIMS) search is greater that 12 months old at the time of submission. As per Requirement 1b of the Code of Practice, AHIMS searches must be contemporaneous with the project (less than 12 months). Please update the AHIMS search and review for currency.	Artefact updated the AHIMS site search, requested new mapping and updated the ACHAR to reflect these changes.	Revised ACHAR – Appendix M
On the basis that the above comments are addressed, Heritage NSW has provided recommendations in relation to Draft Conditions of Consent, as included in Attachment A.	Noted.	N/A
Heritage Council of NSW		
It is understood that there are no items within or in the immediate vicinity of the proposed SSD site listed on the State Heritage Register which will be impacted by the project, and that the site has been assessed as having nil-low archaeological potential. Heritage NSW has no further comment on the proposal and we have provided recommended draft conditions of approval in Attachment A.	Noted.	N/A
Conservation Programs, Heritage and Regulation Group (CHPR)		
Biodiversity <u>BDAR and BAM-C Access</u> CPHR has undertaken its review without access to the case in the Biodiversity Assessment Method Calculator (BAM-C) or access to digital files that form part of the BDAR. *Recommended Action*: Once the BDAR is updated (as per the additional information requested), the consultant should add 'Greater Sydney – Compliance & Regulation' as a case party in the Biodiversity Offset and Agreement Management System (BOAMS) and upload all required digital files (refer to Appendix L – Table 27 in BAM (2020) for what is required). *Extent and Timing*: Pre-determination	The Revised Biodiversity Development Assessment Report (**BDAR**) has been updated to add 'Greater Sydney – Compliance & Regulation' as a case party in the Biodiversity Offset and Agreement Management System (BOAMS) and all required digital files have been uploaded.	Revised BDAR – Appendix N
<u>Vegetation Integrity / Survey Plot Location</u> The reported vegetation integrity (VI) score for Cumberland Plain Woodland (CPW) is 14.3. This is very close to the 15 VI score threshold, where biodiversity credit offsets are required for TECs. CPHR notes that a tree cover of 30%, and the litter cover percentage in some of the 1 x 1 m plots reported in Appendix B of the BDAR appear to be low. This means they may not accurately represent the condition of the plant community type (PCT) which is made up of predominantly trees. The largest tree size class recorded within the plot (Appendix B) is 30-49 cm. This is inconsistent with the Arboricultural Impact Assessment (AIA), which reports Tree #125 to have a diameter of 64 cm (using a diameter tape). CPHR requests justification is provided in the BDAR for the aptness of the plot location and data, particularly the 20 x 20 m floristic plot location. Aerial imagery shows a significant gap in the canopy (Figure 8 of the BDAR) where this plot is located. *Recommended Action*	The vegetation integrity score was low due to the disturbed and altered nature of the vegetation, and as a result, a low vegetation integrity score is expected. The closeness to the threshold is therefore coincidental. The location of the BDAR plot was located in the only area of the subject land suitable for a 20 × 50 m plot. Although there is a canopy gap, the vegetation still forms part of the same patch (consistent with BAM guidance) and provides a valid representation of condition of the vegetation present. The tree identified in the Arboricultural Impact Assessment (**AIA**) was outside the BDAR plot and therefore not recorded. An additional site assessment was subsequently undertaken using 10 × 100 m plots, which captured areas of regeneration and additional species, resulting in higher vegetation integrity scores and credit requirements. Refer to the revised BDAR for further details.	Revised BDAR – Appendix N

Summary of Issue Raised	Response	Reference / Appendix
▪ Update the BDAR to provide justification for the validity of the vegetation plot location. This is to be in line with the BAM Operational Manual – Stage 1 (DPE, 2022) subsection 3.31 and 3.4 which states: – 'Separate vegetation zones are required for: parts of the subject land where the vegetation has a current VI score of: <15 for a PCT representative of a critically endangered ecological community (CEEC) or an endangered ecological community (EEC).' – 'Where there are PCTs with vegetation zones that are too small to fit in a survey plot (e.g. some sandstone riparian communities in the Sydney Basin) the assessor should modify traditional sampling methods to fit the site.' – 'If a standard plot does not fit into a vegetation zone, a longer and narrower (e.g. 10 m x 100 m = 0.1 ha) or wider and shorter (e.g. 25 m x 40 m = 0.1 ha) plot may be used. If the vegetation zone is smaller than the standard plot size dimensions allow, the assessor may adjust the plot dimensions to fit as best as possible, providing it is representative of the vegetation zone.' ▪ Consider using a vegetation plot of an irregular shape to better survey the vegetation zone and undertake another plot survey to inform the updated BDAR. *Extent and Timing*: Pre-determination		
<u>Flora and Fauna Surveys</u> Section 4.3 of the BDAR states, 'Targeted surveys were undertaken for any SAII species credit species considered likely to have suitable habitat within the Subject Land (Figure 11). These surveys were implemented in accordance with Section 5.3 of the BAM and all relevant DCCEEW threatened species survey guidelines'. However, no details of the survey methods are outlined in the BDAR. Table 13 and Table 14 of the BDAR state that no targeted surveys were undertaken for any of the candidate fauna or flora species. *Recommended Action*: The BDAR should be updated to include details of surveys undertaken in Section 4, including the 'relevant DCCEEW threatened species survey guidelines' used. *Extent and Timing*: Pre-determination	The section heading appears to have been misinterpreted. The surveys undertaken targeted microhabitats suitable for Serious and Irreversible Impacts (**SAII**) threatened species and flora species predicted by the NSW Biodiversity Assessment Method Calculator (**BAMC**). The surveys confirmed that no suitable microhabitats were present, and therefore the predicted species were unlikely to occur. The report has now been revised to clearly describe the survey effort and reference the relevant DCCEEW threatened species survey guidelines. Refer to the revised BDAR for further details.	Revised BDAR – Appendix N
<u>BDAR Avoid and Minimise</u> The BDAR has not addressed how impacts are reasonably avoided or minimised on trees descriptive of the CEEC CPW, which is a SAII entity. *Recommended Action*: ▪ CPHR recommend that the proposed development is refined to enable CEEC trees to be viably retained in line with the requirements to genuinely avoid and minimise impacts as per clause 6.2 and 6.12 of the *Biodiversity Conservation Act 2016* and section 7 of the BAM. ▪ The development should be refined in consultation with an appropriately experienced AQF Level 5 arborist, as detailed in the AIA comments at Item 5. The AIA should be updated to retain medium and high retention value trees and trees descriptive of CPW.	▪ The avoidance and minimisation measures within the BDAR have been addressed in consultation with the project design team and qualified arborist. The revised BDAR has been updated to incorporate information on avoidance, minimisation and justification for any retained impacts. This will require input from all relevant consultants, with the BDAR compiling the outcomes. ▪ Refer to the revised BDAR and revised Arboricultural Impact Assessment for further details. ▪ ELA have updated the AIA to assess the latest plans, wherein majority of the trees remain retention-incompatible. ▪ It is important to note that majority of the trees subject to major encroachment (>20% NRZ encroachment, and / or any SRZ encroachment) are largely impacted ▪ by the proposed road-widening along Crescent Street, and the extent of cut and fill proposed.	Revised BDAR – Appendix N Revised Arboricultural Impact Assessment – Appendix K

Summary of Issue Raised	Response	Reference / Appendix
▪ Following refinement of the development, the BDAR should be updated and outline (in Section 6) how impacts were genuinely avoided/minimised for the CEEC. *Extent and Timing*: Pre-determination	▪ Should additional tree retention be required, this will likely only be achieved by substantial redesign, which would likely need to involve reduction of earthworks, removal of buildings, and / or avoidance of widening Crescent Street. In addition, replacement planting species have been determined by Arcadia – ELA have not undertaken assessment of whether proposed plantings would constitute and replace CPW.	
<u>Arboricultural Impact Assessment</u> Based on a review of the AIA, CPHR have identified the following issues: ▪ The AIA states that the entire site is 'impacted' (Figure 12 and Figure 14), and that due to this, no trees can be retained on site. CPHR does not support this justification. ▪ CPHR notes that most trees are located along the site boundary, in locations where landscaping/open space is proposed. There is opportunity for impacts to tree protection zones (TPZ) to be appropriately avoided / minimised. For example, impacts could be appropriately avoided / minimised by measures including but not limited to: – retaining trees by adjusting plans to limit/reduce grade level changes – specifying suitable fill material for example coarse-textured soils, for shallow fill areas – relocating structures away from TPZs, employing hand excavation – carefully removing existing hardstand under the supervision of an arborist – and/or implementing tree-sensitive construction methods. ▪ The threshold specified in the AIA (page 14-15 of a >20% TPZ encroachment automatically resulting in a tree not being viable for tree retention is not supported. Such a strict threshold is not in line with the Australian Standard (AS 4970-2009) and industry practice. ▪ Section 3.2 of the AIA specifies that two trees are subject to 'medium' impact to their TPZs, without specifying the type of impact. The AIA further states that mitigation measures are to be implemented to retain these trees however no tree specific mitigation measures are provided in the report. ▪ The AIA states that 'confirmation on the viability for retention must be confirmed by the project arborist prior to construction.' This approach is not supported by CPHR. The viable retention of trees should be demonstrated now, not after development consent is obtained. The viable retention of trees must be demonstrated in line with section 3.3.4 of AS 4970-2009 which may require root mapping. ▪ Section 3.5 of the AIA specifies that four neighbouring trees will be impacted and require removal. CPHR flags that approval for the project should not be provided unless these trees can be viably retained (with an updated AIA to demonstrate this), or if this is not feasible, written confirmation should be provided by the tree owner(s) that they consent to the tree removal. *Recommended Action*: ▪ CPHR recommends that the proposal is refined in consultation with a suitably qualified AQF Level 5 arborist to design, avoid and minimise impacts within the TPZs of trees that have a medium and high retention value and trees descriptive of CPW to viably retain as many trees as possible. Once this is undertaken, the plans should be updated accordingly for example landscape plan, architectural plans and bulk earthwork plan. An updated AIA and tree protection plan (TPP) is to be provided. ▪ The updated AIA should:	▪ Ecological note that most trees are deemed incompatible with retention are significantly affected by road widening works along Crescent Street. The site will undergo extensive demolition, with cut or fill operations averaging over 50mm and up to 2m, along with additional excavation for remediation. Trenching for stormwater further complicates tree retention. The Construction Management Plan (CMP) by Decode (2025) shows that a significant portion of the site needs to be used for car parking, vehicle access, and construction access, including the eastern area. Landscaping works, including turfing, hardstand areas, paving, concrete, and new plantings, are planned across the entire site. ▪ According to AS4970-2025 Protection of Trees on Development Sites, these activities are expected to have cumulative impacts on trees, making retention challenging and in some cases impossible. ▪ The revised AIA (see Section 3 and Appendix F) specifically reviews boundary trees and considers opportunities for retention. Where feasible, trees have been retained or recommended for retention with mitigation. However, due to the extent of required works, on a stage by stage basis, nearly all boundary trees are subject to significant Tree Protection Zone (TPZ) encroachment. The report details the type and extent of impacts for each tree and outlines mitigation measures for those that can be viably retained. ▪ If additional tree retention is required, substantial redesign would be necessary, involving a reduction of earthworks, removal of buildings, and/or avoidance of widening Crescent Street. AS4970-2025 defines major encroachment as more than 20% into the Nominal Root Zone (NRZ) and any encroachment into the Structural Root Zone (SRZ). Trees in this category require specific further investigation to prove feasibility for retention. The updated AIA clarifies that NRZ encroachment is considered in conjunction with proposed impacts and arboricultural judgement, not as an automatic threshold for removal. The report provides a tree-by-tree assessment, including the type of impact for each removal or retention recommendation. ▪ The updated AIA specifies the type of impact for each tree subject to moderate or major impact that are considered retention-compatible, subject to the implementation of mitigation measures in Table 3 of the report. The updated AIA has removed any leeway for further assessment, providing a clear pre-construction assessment based on current design and site constraints. Trees considered retention-compatible, or retention-compatible subject to mitigation measures, are listed in Appendix F, with specific mitigation measures and protection requirements outlined in Section 4.2 of the report. ▪ Where possible, retention has been prioritised, and further investigation into trees located within the culvert has been undertaken. The updated AIA outlines mitigation measures regarding Trees 12924, 12925, and 12927, required to consider them retention-compatible under the current design. Retention of Tree 12929 is not considered viable, and while this tree is	Revised Arboricultural Impact Assessment – Appendix K

Summary of Issue Raised	Response	Reference / Appendix
– List all documentation referenced during the assessment process. – Contain a schedule documenting: botanical and common name, age class, dimensions inclusive of, height, canopy spread, trunk diameter at breast height (DBH), calculated TPZ, calculated Structural Root Zone (SRZ), calculated development incursion into the TPZ (if any), health, structure and condition of the trees. – Review the tree retention values provided in the current AIA of trees with a diameter (DBH) of 50 cm or greater to ensure the appropriate retention value is assigned in line with Appendix A of the AIA. – Assess the proposed development in its entirety. This includes, but is not limited to, proposed stormwater infrastructure, retaining walls, grade changes, excavation and removal of hardstand. – Identify the specific type of impact within each TPZ of trees identified to have a medium or high tree retention value and trees descriptive of CPW. – Ensure impacts to TPZs are avoided/minimised to support the viable retention of trees wherever possible. – Demonstrate that retained trees can be retained viably in accordance with the Australian Standard 4970 – 2009. – Include specific mitigation measures to be implemented throughout the demolition and construction phase for each tree to be retained. These specifications must be tree and site specific, not generic. ▪ The updated TPP should: – Be at a scale of 1:100 or 1:200 and show the location of all trees that have a TPZ extending into the development impact area. – Show all proposed development works, including the location of above and below ground structures and services. – Identify the tree protection area for each tree and clearly identify the percentage of development encroachment into the TPZ and canopy. – Include survey details and show the existing ground levels at the base of each tree, the DBH of each tree and the corresponding tree number. – Plot all tree locations with survey accuracy (by registered surveyor). *Extent and Timing:* Pre-determination	listed as an exempt species under the local Development Control Plan (DCP), written approval from the landholder is required prior to removal. ▪ ELA has updated the AIA to assess the latest plans, wherein the majority of the trees remain retention-incompatible. It is important to note that most trees subject to major encroachment are largely impacted by the proposed road-widening along Crescent Street and the extent of cut and fill proposed. If additional tree retention is required, substantial redesign would likely be necessary, involving a reduction of earthworks, removal of buildings, and/or avoidance of widening Crescent Street. Replacement planting species have been determined by Arcadia, and ELA has not assessed whether proposed plantings would constitute and replace the existing canopy. ▪ All documentation used to determine impacts and encroachments is listed throughout the report. ELA has considered the revised plans provided by the project team. Appendix F contains a schedule documenting retention values for large trees, reviewed in line with Appendix A of the AIA and consistent with the previous report. The assessment covers all proposed works, including stormwater, retaining walls, excavation, and hardstand removal. Plans not shown in Appendix A have not been considered. ▪ The type of impact within each NRZ is specified in Appendix F for all trees. Due to site constraints, the proposed design was unable to avoid or minimise NRZs. The updated AIA has reassessed all works and prioritised retention of trees within the culvert. Due to cumulative impacts across the site, most trees are still considered incompatible with retention without considerable design amendment. Viable retention is demonstrated in accordance with AS4970-2025. ▪ Section 3 provides tree- and site-specific mitigation measures for each tree to be retained subject to encroachment. These include fencing, ground protection, arborist supervision, and other tailored strategies to minimise construction impacts and support tree health throughout the project. The updated Tree Protection Plan (TPP) provides an overview of trees with NRZ extending into the site to be retained, with zoomed-in insets for each tree meeting the 1:200 scale requirement. Appendix A shows all plans assessed in this report. Figures 4 to 6, and Figures 16 to 18, show the landscape masterplan for a sense of the end layout, while the TPP (Figure 7) includes the linework for all works. The TPP highlights the proposed TPZ, and encroachment percentages remain in Appendix F. ▪ Tree survey shown in Figures 13 to 15 highlights that trees have been aligned to the survey. Details of existing ground levels and Diameter at Standard Height (DSH) values are not shown, as this is considered unnecessary and may be shown on the survey plans submitted by others.	

Summary of Issue Raised	Response	Reference / Appendix
Endeavour Energy		
Please find attached for the applicant's reference a copy of Endeavour Energy's Standard Conditions for Development Applications and Planning Proposals, Version 10, January 2025 which provides some additional and updated information. Based on and subject to the foregoing Endeavour Energy has no objection to the Development Application.	Noted.	N/A
Cumberland City Council		
Permissibility The applicant relies on Building 4 being shop top housing for permissibility. Shop top housing is defined to mean *'one or more dwellings located above the ground floor of a building, where at least the ground floor is used for commercial premises or health services facilities'*. When assessing whether the building falls within the definition of shop top housing, regard needs to be had as to where and what is the ground floor, including the building's siting relative to natural ground level. Drawing DA-2-22LG Rev C shows a basement car park under Building 4 at RL 13.1 and a 75 m² commercial tenancy at RL 11.0. The applicant does not overlay contours or spot levels from the survey plan over the architectural plans. When a comparison is made with the survey plan, the car park at RL13.1 approximates ground level for the footprint of Building 4. That being the case, the ground floor is not used for commercial premises or health services facilities, and the building therefore is not shop top housing. If not shop top housing, then the residential component of the building is defined as a 'residential flat building' which is prohibited in the MU1 zone.	The Cumberland LEP 2021 defines shop top housing as *one or more dwellings located above the ground floor of a building, where at least the ground floor is used for commercial premises or health services facilities.* Commercial premises includes *business premises, office premises* and *retail premises.* The ground floor of Building 4 comprises two commercial tenancies, one at RL 13.1 located along the northern façade (Ground Floor Plan), and another at RL 11.0 located at the south-eastern corner of the building, adjacent to Crescent Street (Lower Ground Floor Plan). The ground floor of Building 4 also comprises the lobby for shop top housing, waste storage rooms, mechanical plant / servicing, and car parking for the residential apartments above. Importantly, the floor level of all the residential apartments on Level 1 of Building 4 are located at RL 16.6 (i.e. above the ceiling level of the commercial areas on the Ground Floor and Lower Ground Floor). Therefore, despite the slight level change across the site, Building 4 satisfies the two key preconditions for development to be characterised as shop top housing. In providing additional clarity on what is lawfully considered 'shop top housing', consideration has also been given to the case of *Lahoud v Willoughby City Council [2024]* NSWCA 163. In this case, the NSW Court of Appeal clarified that there is no requirement for the entire ground floor to be commercial use, and that the majority of the ground floor does not need to be for commercial use. The NSW Court of Appeal also found that resident's parking located on the ground floor was a form of shop top housing. The provision of residential car parking on the Ground Floor of Building 4 does not constitute a 'dwelling'. Therefore, Building 4 has been lawfully classified as shop top housing development as there are no dwellings on the ground floor.	Revised Architectural Plans -Appendix E Revised Design Report -Appendix F
FSR and Height Bonuses The applicant claims 30% height and FSR bonuses under s.16 of *State Environmental Planning Policy (Housing) 2021*. Section 16 falls within part 2 division 1 of the SEPP. Pursuant to s.15C(1)(a), that division only applies to development that is permitted under Chapter 4 Part 4 (Build to Rent Housing), Chapter 5 (Transport Oriented Development) or another environmental planning instrument. The development does not involve build to rent housing and is not within	Buildings 1, 2, 3 and 4 are located within the eastern and central portions of the site, on land zoned MU1 Mixed Use under the Cumberland LEP 2021. *Shop top housing, retail premises* and *commercial premises* are permitted with consent on land zoned MU1 under the Cumberland LEP 2021. Buildings 5, 6, and 7 are located within the central and western portions of the site, on land zoned R4 High Density Residential under the Cumberland LEP 2021. *Residential flat buildings* are permitted with consent on land zoned R4 under the Cumberland LEP 2021.	Revised Clause 4.6 Variation Request (FSR) - Appendix U Revised Clause 4.6 Variation

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a transport oriented development precinct. Therefore, for the division and hence bonus to apply, the development must be permissible under another environmental planning instrument. If the conclusion is that the residential component of Building 4 is a residential flat building, the development is not permitted under another environmental planning instrument and the bonus provisions do not apply. Additionally, the Department would need to satisfy itself that the site is in an accessible area within the meaning of s.15C(1)(c).	In accordance with Sections 15B and 15C of the Housing SEPP, residential development that is subject to the in-fill affordable housing provisions (under Chapter 2, Part 2 of the Housing SEPP) includes *residential flat buildings* and *shop top housing*. As noted above, *residential flat buildings* and *shop top housing* are permitted with consent under another environmental planning instrument (being the Cumberland LEP 2021). A total of 15% of the total floor space is proposed to be provided as affordable housing as part of the proposed development. The site is also located 743 metres walking distance from the nearest public entrance to Harris Park train station, and is 382 metres walking distance from the bus stop at Church Street (opposite Raymond Street). These walking distances were measured using a trundle wheel along a route that can be safely walked by a pedestrian using public footpaths, traffic lights and pedestrian crossings, etc. The site is within 800 metres of a train station entrance, and within 400 metres of a bus stop use by a regular bus service and therefore meets the definition of *accessible area* under Section 15C(1)(c) of the Housing SEPP 2021. The in-fill affordable housing bonuses under Chapter 2, Part 2, Division 1 (In-fill affordable housing) of the Housing SEPP therefore applies as the proposed development: ▪ Comprises *residential accommodation* and *shop top housing* which are permissible with consent in the R4 and MU1 zones (respectively) under the Cumberland LEP 2021, ▪ The affordable housing component is greater than 10%, and ▪ Is on land within the Six Cities Region in an accessible area (i.e. within 800 metres walking distance of a public entrance to a railway station). Refer to the response above regarding Building 4 being defined as "shop top housing" (and therefore being eligible to utilise the in-fill affordable housing provisions under Chapter 2, Part 2 of the Housing SEPP 2021).	Request (Height) -Appendix V Revised Architectural Plans -Appendix E
Floor Space Ratio (FSR) Pursuant to clause 4.4 of the *Cumberland Local Environmental Plan 2021*, different parts of the site are mapped as having maximum floor space ratios of 3.4:1 and 3.75:1 respectively. A relatively small part of the site is not subject to a floor control. The site area of the W1 3.4:1 FSR as measured on the digital maps with the LEP is 12,181.06 m². The applicant incorrectly states the area to be 12,406 m² (224.94 m² in its favour). The site area of the W5 3.75:1 FSR area as measured on the digital maps with the LEP is 15,442.33 m². The applicant incorrectly states the area to be 16,267 m² (824.67 m² in its favour). The application attributes 50,387 m² of gross floor area to the W1 FSR area and 83,830 m² to the W5 FSR area.	As noted above, the GFA and FSR calculations have been comprehensively reviewed and updated following the design changes made to the proposed development in response to submissions received. In addition, the proponent engaged Clement and Reid Project Surveyors to verify and confirm that the correct site areas have been adopted for the purpose of justifying the site-specific FSR variations across the site. Based on this technical verification, the FSR areas have been accurately determined to align with the relevant zone boundaries, as follows: ▪ Mapped FSR of W5 (3.75:1) under the Cumberland LEP 2021 – applicable to the eastern portion of the site zoned MU1 Mixed Use. ▪ Mapped FSR of W1 (3.4:1) under the Cumberland LEP 2021 – applicable to the western portion of the site zoned R4 High Density Residential. The Surveyor has undertaken a detailed assessment of the zoning information by sourcing Geographic Information System (**GIS**) data and importing it into AutoCAD, with both the zoning and site boundaries aligned using MGA coordinates. However, the zoning data prepared by the Council	Letter from Surveyor - Appendix T Revised Survey Plan -Appendix S Revised Architectural Plans -Appendix E Revised Clause 4.6 Variation Request (FSR) - Appendix U

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covers a broader area than the site itself. As such, the overlay shows minor discrepancies of approximately 80mm to 100mm between the zoning and cadastral boundaries.

A comparison of zoning areas derived from GIS data against those in the SSDA submission reveals small variations in zone areas. These minor differences are attributed to the imperfect alignment between the GIS zoning data and the site boundary. This is not uncommon given that GIS datasets are not survey accurate and were historically compiled from image-based sources, particularly those based on the Digital Cadastral Data Base (**DCDB**).

The discrepancies in zoning areas across the site are outlined in the table below. This table notes the difference in GIS data confirmed by the Surveyor by comparison with the verified site areas noted within the SSDA.

Zone	Surveyor GIS Data	**SSD Proposed**	Difference
R4 Zone	12,246 sqm	**12,406 sqm**	+160 sqm
MU1 Zone	16,172 sqm	**16,267 sqm**	+95 sqm
SP2 Zone	1,550 sqm	**1,490 sqm**	-60 sqm
RE1 Zone	7,860 sqm	**7,714 sqm**	-146 sqm
Site Area	*37,828 sqm*	***37,877 sqm***	*-49 sqm*

Importantly, GIS zoning lines are commonly adjusted in practice to align with actual cadastral lot boundaries. The GIS data used noted above should be viewed as indicative rather than definitive, allowing flexibility where necessary to support a more detailed assessment.

In addition, during the Planning Proposal (PP) stage, it was agreed that the RE1 Public Open Space zone would comprise 7,714m². This figure was later incorporated within the site-specific DCP, which includes the following provision:

"C5. Provide a range of public and communal open spaces and facilities, including:

an embellished and dedicated public open space based on the RE1 zoning (approximately 7,700 sqm)

As outlined above, a comprehensive assessment has been undertaken of the relevant site areas across the site. This assessment confirmed that the site areas noted within the SSDA as originally lodged are accurate. No changes are proposed to the site areas across the site as a result of the Surveyor's assessment.

The portion of the site zoned R4 (which is subject to a mapped FSR of 3.4:1) comprises an area of 12,406 sqm, and the portion of the site zoned MU1 Mixed Use (which is subject to a mapped FSR of 3.75:1) comprises an area of 16,267 sqm. As per the original SSDA submission, the total site area is 37,877 sqm for the purpose of calculating GFA and FSR.

Notwithstanding this, the Clause 4.6 Variation Request (FSR) has been updated to reflect the minor changes in GFA across the site, confirm the extent of site-specific variations sought to the mapped FSR controls, and to incorporate additional planning grounds justifying the variation to the mapped FSR development standards.

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The applicant incorrectly excludes the following from its calculations of GFA: *Buildings 1, 2 and 3* ▪ Lower Ground Floor – 'Supermarket refrigeration plant room'. If this a cool room to store goods associated with the supermarket, then it needs to be included in GFA. ▪ Ground Floor – 'Supermarket waste room', 'WC Amenity/EOT', 'FOGO room', corridor servicing the south-western side of the building. ▪ Levels 03-06 – 'Storage' marked as 17 m². *Building 5* ▪ Ground floor and Level 05 – 'Store' (unclear if this area is enclosed or a storage cage). ▪ Levels 01 and 03 and 04 - 'Store' (unclear if this area is enclosed or a storage cage) and 'Store' marked as 29sqm. ▪ Level 02 -'Store' (it is unclear if this area is enclosed or a storage cage) and 2 x 'Store' marked as 29 m² and 55 m². *Building 6* ▪ Ground floor– 'Store' marked as 47 m². ▪ Levels 01-05 – 3 x 'Store' marked as 8 m², 47 m² and 8 m². *Building 7* ▪ Lower Ground Floor – 'Bulk Good Storage' marked as 11 m².	The Architectural Plans have been revised to clearly label areas utilised for plant rooms, mechanical services or ducting (etc) which are to be excluded from the calculation of GFA. Refer to Section 3.4.5.1 of the RTS/Amendment Report for a detailed breakdown of the proposed GFA, and the revised Architectural Plans for further details.	Section 3.4.3.1 of RTS/Amendment Report Revised Architectural Plans -Appendix E
Car Parking Pursuant to s.19(2)(e) and (f) of the Housing SEPP, the residential development requires a total of 1,230 car spaces while the proposal provides for 1,480 spaces, an excess of 250 spaces. Under the definition of gross floor area, a concession is granted for car parking to meet requirements of the consent authority, but that concession does not extend to parking provided in excess of the consent authority's requirements. Those additional 250 spaces amount to 3,240 m² of gross floor area (assumed 2.4m x 5.4m x 250). Of this, Council estimates and attributes 1,620 m² to each of the W1 and W5 FSR areas. When the abovementioned additional floor area in included, the gross floor area for the W1 FSR area is 52,761.2 m² and the gross floor area for the W5 FSR area is 85,794.0 m². When those areas are divided by the true, digitally referenced, site areas, the resultant FSRs are 4.33:1 for the W1 area and 5.56:1 for the W5 area. If the FSR bonus does not apply, the FSR in the W1 area of 4.33:1 exceeds the 3.4:1 limit by 27.4%. If the bonus does apply, bringing the permissible FSR to 4.42:1, the FSR complies. What's more, if the effective FSR was calculated by including the area attributed to above ground parking to meet the consent authority's requirements (which is excluded by definition but contributes to building bulk) – and noting the design fails to adhere to Council town planning objectives to site parking within a basement, the FSR would measure 6.56:1, further exacerbating the development standard departure and demonstrating the overall unacceptable bulk of the proposal. If the FSR bonus does not apply, the FSR in the W5 area of 5.56:1 exceeds the 3.75:1 limit by 48.1%. If the bonus does apply, bringing the permissible FSR to 4.875:1, it still exceeds the limit by 13.9%. What's more, if the effective FSR was calculated by including the area attributed to above ground parking to meet the consent authority's requirements (which is excluded by definition but contributes to building bulk) – and noting the design fails to adhere to Council	A total of 1450 **residential** car parking spaces are provided (excluding visitors). Due to the changes in the unit mix and total number of apartments, the difference in provision compared to the non-discretionary car parking rates is reduced to 125 spaces on the basis that the Housing SEPP generates a minimum requirement of 1,325 residential parking spaces (see page 28 of the TTPP report). As part of the previous rezoning of the site to MU1 and R4, site-specific car parking controls were introduced under Clause 6.21(4) of the CLEP. This followed comprehensive traffic impact assessments and detailed reporting. The inclusion of these controls in the CLEP, rather than the DCP, reflects the rigorous planning process undertaken to establish parking rates that are both commercially viable for the proponent and result in acceptable traffic impacts on the site and surrounding area. This was one of the key commercial factors taken into account for the development viability. The TTPP analysis on page 28 of its report identifies that the proposed development under the CLEP will generate a maximum total of 1,948 spaces (inclusive of visitor parking) compared to the provision of 1,474 residential spaces. This is a significant reduction below the maximum car parking rates set as part site specific provisions for the land. It is incorrect to assert that exceeding the parking rates set out in the non-discretionary standard of the Housing SEPP therefore means that the car parking provision exceeds the requirements of the consent authority and as a consequence additional GFA applies. The parking provision is both	Revised Architectural Plans -Appendix E

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town planning objectives to site parking within a basement, the FSR would measure 6.73:1, further exacerbating the development standard departure and demonstrating the overall unacceptable bulk of the proposal.	below the LEP and DCP controls which is the correct basis upon which to assess the requirements of the consent as opposed to a non-discretionary standard which has a different purpose entirely. This is reinforced in the Department's Practice Note: PRACTICE NOTE INFORMATION https://www.planning.nsw.gov.au/sites/default/files/2023-12/in-fill-affordable-housing-practice-note.pdf Non-discretionary development standards do not prevent the consent authority from granting consent even though a non-discretionary development standard is not complied with. Particularly, where the Housing SEPP or another EPI contains more permissive standards for the same matter. For example, the in-fill affordable housing provisions include a non-discretionary development standard for minimum parking rates. The consent authority cannot refuse a DA based on parking rate if these minimum rates are met. If another planning instrument contains a more permissive standard, or the consent authority is of the opinion that a lower parking rate is justified on merit, it is not intended that a written variation request pursuant to clause 4.6 should be required for the nondiscretionary parking standard under the Housing SEPP. For the reasons set out above, we do not consider Council's FSR assessment to be valid.	
Tantamount LEP Amendment The W1 and W5 FSR controls are site specific controls that evolved from the process to amend the LEP. They should not be treated lightly. The proposed FSRs of 4.33:1 for the W1 area (and effective FSR of 6.56:1) and 5.56:1 for the W5 area (and effective FSR of 6.73:1) represent significant departures from the site specific FSR controls. The Clause 4.6 Variations seeks to justify the variation by averaging FSR across the W1 and W5 FSR areas collectively. There is no basis to apply that averaging approach. Each FSR area must be looked at individually. These are not minor variations. They are numerically significant variations to fresh, site-specific, FSR controls. The variations are not justified. It is inappropriate to ignore a site specific FSR development standard and certainly to the magnitude proposed. If the proponent wishes to do so, then the appropriate planning course is to seek a further amendment to the LEP under part 3 of the Act that may justify increasing the FSR maximums. In the absence of doing so, the application as presently proposed cannot be justified and does not warrant approval.	For the reasons set out above, Council's assessment of FSR is factually not correct and the overall proposed FSR for the site remains within that permitted under the Housing SEPP. The Clause 4.6 Variation Request (FSR) has been updated to reflect minor changes to the calculation of GFA across the site. The extent of variation sought to the FSR development standards across the mapped W1 and W5 areas has been calculated separately and justified separately. The extent of variation to the FSR controls has also been considered overall across the whole site for clarity only, notwithstanding the different FSR controls that apply to the eastern and western portions of the site. The Cumberland LEP 2021 provides a mapped maximum FSR of 3.4:1 within the western portion of the site (on land zoned R4 High Density Residential) and a mapped maximum FSR of 3.75:1 within the eastern portion of the site (on land zoned MU1 Mixed Use). These FSR controls were established as part of a Planning Proposal process to amend the site-specific planning controls that apply to the site to facilitate the delivery of a mixed-use development comprising residential, retail, commercial and open space. The amended site-specific planning controls were gazetted in mid-2022 and are set out within Clauses 6.20 and 6.21 of the Cumberland LEP 2021. The NSW Government is committed to delivering 377,000 well-located new homes within the National Housing Accord period over the next five years. To achieve this target, the NSW Government has established LGA-specific targets. For Cumberland City Council, it is expected that 12,200 new homes will be delivered over the next 5 years. In December 2023, the NSW Government implemented in-fill affordable housing reforms to encourage the provision of more affordable housing and market housing. Part of these reforms included floor space and height bonuses of up to 30% for residential flat buildings and shop top housing developments which provide at least 10% of total floor space as affordable housing. These reforms are set out under Chapter 2, Part 2, Division 1 (In-fill affordable housing) of the Housing SEPP 2021. The proposed development provides a total of 15% of the total floor space as affordable	Revised Architectural Plans -Appendix E Revised Clause 4.6 Variation Request (FSR) - Appendix U

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	housing and is therefore eligible for the in-fill affordable bonuses under Section 16 of the Housing SEPP 2021. The proposed development (as amended) seeks to provide a total of 1,374 residential apartments of which 219 will be affordable housing managed by a registered Community Housing Provider (**CHP**). Upon delivery, the proposal will contribute over 11% of homes that Council is required to deliver under the Accord.	
GFA for Retail and Commercial Premises Clause 6.21 of the CLEP 2021 sets site specific maximum gross floor area as follows: ▪ Maximum retail premises GFA – 2,500 m² ▪ Maximum commercial premises GFA (not being retail premises) – 5,000 m² The lower ground floor and ground floor includes areas such as refrigeration plant rooms, waste rooms, WC amenity and bathroom facilities (end of trip), FOGO room and corridor servicing the south-western side of the building. It is uncertain whether these spaces are exclusively associated with retail/commercial premises. It seems likely that they are. To the extent that they contribute to the commercial and retail gross floor areas, they will result in a breaches of clauses 6.21(2) and 6.21(3) of the LEP. No clause 4.6 submissions have been lodged and hence the application is incapable of approval in the form proposed.	The design and layout of the maximum retail and commercial premises comply with clause 6.21 od the CLEP2021 as per the maximum GFA outlined below: ▪ Retail premises - 2,496 sqm ▪ Commercial premises - 2,505 sqm	Revised Architectural Plans -Appendix E Revised Design Report -Appendix F
Height of Building Pursuant to clause 4.3 of the *Cumberland Local Environmental Plan 2021* height of buildings, the site has different height limits across the site of 32m, 51m, 57m, 88m and 91 and 96m. The applicant is claiming the 30% bonus under the Housing SEPP. If the bonus applies, the permissible heights are increased to 41.6m, 66.3m, 74.1, 114.4m, 118.3m and 124.8m respectively. The proposal seeks a variation to the maximum building height (even allowing for the bonus applying) as follows: ▪ Building 5 (66.3m maximum), proposed 70.89m – exceedance 4.29m. ▪ Building 6 (74.1m maximum), proposed 77.44m – exceedance 3.34m. ▪ Building 7 (74.1m maximum), proposed 79m – exceedance 4.9m. Page 9 of the clause 4.6 submission states that the portion of the Buildings 6 and 7 that exceed the height of building are 'Architectural roof features' pursuant to clause 5.6 of the CLEP 2021 and therefore are excluded from the clause 4.6 exception to development standards. The Council disputes that position. Properly considered, they are not architectural roof features. A clause 4.6 submission is required.	Buildings 05, 06, and 07 have each reduced in height, lowering their RLs by between three and four metres. These reductions improve the transition to the public domain and adjacent open space while also moderating bulk at the edges of the precinct. The revised heights are shown below ▪ Building 05 20 Levels 67.56 meters (RL 78.90) - exceedance 1.26m. ▪ Building 06 23 Levels 73.40 meters (RL 86.50) – compliant ▪ Building 07 23 Levels 75.20 meters (RL 87.80) - exceedance 1.1m. Refer to Clause 4.6 variation request (Height) which provides justification for any non-compliance in height.	Revised Architectural Plans -Appendix E Revised Design Report -Appendix F Clause 4.6 Variation Request (Height) - Appendix V
Eastern Driveway – LEP Clause 6.4 Development consent cannot be granted under clause 6.4(1) of the LEP because suitable vehicular access is not presently available and adequate arrangements have not been made to make it available when required. In this regard, Council observes that: ▪ Cumberland Council is the roads authority under the *Roads Act 1993* for Crescent Street. The consent of the Council is required under s.138 of the Roads Act to carry out a work in, on or over Crescent Street. The council's consent has not been sought or obtained for new vehicular access to Crescent Street. Based upon the present design, the Council will not provide its consent.	The eastern driveway access has been assessed and would meet adequate requirements. Further, the driveway has been modelled and shows no adverse effects. The right turn bays are adequate. This eastern driveway is the location of the existing driveway. It is some 100m west from the Woodville Road intersection. In response to Council's comment on a potential queues on Crecent Stret from Woodville Road, a right turn bay will be provided. Modelling indicates that it has enough capacity to store right-turning queues. Aimsun modelling was undertaken for the peak two hours of the morning (7:00am – 9:00am) and evening (4:00pm – 6:00pm) weekday periods. While the Sidra Intersection covers the peak morning (7:00am – 8:00am) and afternoon (5:00pm – 6:00pm) peak traffic hours.	Section 3 of the Revised Transport Impact Assessment - Appendix P

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▪ The eastern driveway is located too close to Woodville Road and will result in poor safety and efficiency outcomes. ▪ The driveway's proposed location and the limited capacity of a proposed right turn treatment from Crescent Street into the driveway may create a queue spill back onto Woodville Road. ▪ The queue on Crescent Street from the Woodville Road signalised intersection is likely to queue past the proposed driveway and therefore the opportunities to turn into the eastern driveway will be limited. ▪ Driveway dimensions allow for one lane in and one lane out which will be insufficient to satisfy traffic generation. The case of *Georges River Council v Eskander* [2024] NSWLEC 98 is of relevance in considering what is required for an adequate arrangement.	With the intersection upgrade, the modelling indicates that the driveway dimensions are sufficient.	
Loading Bays The 'general loading dock' appears to be deficient in area and detail to accommodate parking, loading and manoeuvring requirements for trucks required for the 2,500 m² of retail space and 5,000 m² of non-retail commercial space. If the general area is utilised by a number of trucks and a further truck then arrives in a forward direction, there appears to be deficient space for that truck to either turn and exit or enter a waiting phase while other truck/s manoeuvre out of the area (if at all possible). Creating a logjam of delivery vehicles and possibly forcing some trucks to reverse out of the loading area creates significant safety issues.	Loading bay has been redesigned and includes a turntable to manage movement of vehicles.	Section 5.4 of the Revised Transport Impact Assessment - Appendix P
Ground Floor Development in MU1 Zone – LEP Clause 6.13 DPHI as the consent authority ought not to be satisfied that the ground floor of Eastern Podium and Building 4 will provide for uses and building design elements that encourage interaction between the inside of the building and the external public areas adjoining the building. On that basis, development consent cannot be granted pursuant to clause 6.13(3)(c) of the CLEP 2021.	The eastern portion of the site containing Buildings 1, 2, 3 and 4 is zoned MU1 Mixed Use. The proposal includes commercial and retail land uses at the ground level of Building 4 to interface with the public open space, forecourt and roadway for activation purposes. This approach will encourage interaction between the internal and external components of the proposal. Commercial uses will activate the interface.	Revised Architectural Plans -Appendix E Revised Design Report -Appendix F
Interactive Façade Treatment The facades should positively contribute to the streetscape. Consider incorporating active and visually engaging façade treatments for the podiums of Towers 5 and 6 (shown in the blue boxes in the image below) to prevent blank walls and create a more inviting frontage. The Woolworths development in Crows Nest serves as a strong example, demonstrating how well-articulated façades can enhance the public domain and improve street-level activation.	The amended design includes a series of new podium facades that include the following design strategies: a. Natural ventilation - Car parks are partially naturally ventilated through the use of screens designed to achieve the required open area. b. Rhythm – The arrangement of all façades has been designed to create a varied sequence while maintaining consistency through a clear modular order. b. Assembly arrangement - In order to create more inviting frontages, the facades of Building 05 and 06 are very distinctive from each other. Building 05 is characterized by it is vertical language. The facade composition employs large portals which host vertical double or single height perforated screens. Meanwhile, Building 06 shows a horizontal facade arrangement. The facade consists of masonry clad spandrel around the perimeter of the carpark with metallic screen openings. c. Patina variation – While distinct in character, both façades utilise colour juxtaposition as part of the overall composition. Building 06 incorporates warm, earthy tones complemented by metallic finishes, whereas Building 05 features masonry-clad balustrades in lighter tones with silver metallic accents. Together, these façades establish an attractive and inviting presence along Crescent Street and the adjoining frontages. Refer to CC-21 for further details.	Revised Architectural Plans -Appendix E Revised Design Report -Appendix F
Heritage	The Railway Memorial (I121) is located in a reserve between Crescent Street and a modern railway embankment. It is permanently shaded by established eucalyptus trees planted in the reserve.	N/A

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The shadow analysis indicates that the Railway Memorial, located at the corner of Crescent Street and Woodville Road, is overshadowed by the proposed development. This memorial is a heritage item listed in the Cumberland LEP 2021 (I121). Given its significance, and in accordance with the Cumberland DCP, the development and its setbacks should be adjusted to avoid overshadowing.	The monument is in the form of a low stone cairn. While the site is historic, there is no evidence of that historical association save for the stone cairn. An understanding of the historic association of the site is in no way impacted by overshadowing. The understanding is solely derived from the information on the brass plaque attached to the cairn. There is no adverse impact arising from overshadowing. The presence of sunlight or shade upon the cairn has no impact on the ability of the public to read the cairn or to understand from the cairn the activities that took place there, giving the location's historic significance. This was supported by a letter prepared by Weir Phillips for the LEC matter.	
General Planning Comments The following floor plans are missing or have not been clearly identified on the architectural plans as 'typical floor plans' over various levels: ▪ Buildings 1, 2 and 3 – Levels 8, 9, 11, L12-23 and L25-32. ▪ Building 4 – Levels 4, 11-12 and 14-17. ▪ Building 5 – Levels 6-9 and 11-18. ▪ Building 6 – Levels 7-9, 11-12 and 14-19. ▪ Building 7 – Levels 7-9, 11-12 and 14-19. This should be provided to enable proper assessment of the FSR and Apartment Design Guide (ADG).	The revised Architectural Plans have been updated to include labelling of typical floor plans for each of the seven (7) buildings. Refer to the List of Plans for Approval which clearly identifies the list of revised Architectural Plans for which consent is sought as part of this Submissions and Amendment Report.	Revised Architectural Plans -Appendix E
The 'circular' retail space nominated as a 'kiosk' (82 m²) requires further clarification to its use and function. If the use is for a 'kiosk', please refer to clause 5.4(6) of the Cumberland LEP 2021 which stipulates a GFA of 50 m² in which this space would not comply.	The use and function of the kiosk located at the ground floor (to the west of Building 2) is to sell food, light refreshments and other small convenience items. The retail kiosk has been reduced in area to comprise a total GFA of 49 m². This complies with Clause 5.4(6) of the Cumberland LEP 2021.	Revised Architectural Plans -Appendix E
The lobby servicing Building 7 provides a 'lift' refer to blue highlight below. It is unclear if this is a chair lift and if a ramp is also provided to access the 'lobby' area. The use of 'chair lifts are generally not supported and DPHI should consider alternatives such as an access ramp to allow access for people with a disability. Further to the above, the Accessibility Review Report – SSDA dated 22 November 2024 states that Buildings 4, 5 and 6 and 7 are identified as non-accessible entrances and will need to be addressed via a Performance Solution report. This should be addressed at the SSDA stage to avoid 'chair lifts'.	The proposed external levels were slightly modified to allow gradual gradients towards the carparks. As result, access to some residential lobbies also include transitions ranging approximately between 500 to 900mm in height. For Buildings 07, 06 and 05, the proposal includes a platform lift to account for the level change between the lobby entry and the lift lobby. The platform lifts have been designed to achieve compliance with the relevant provision of the BCA and Australian standards. The platform lifts do not travel more than the vertical height are permitted to be used for these buildings. Refer to Access Consultant report. Further details will be provided at the detail design stage. As a consequence of the Ground RL level change from 15.00 to 13.00, the access footpaths throughout the site offer an improved access experience.	Revised Architectural Plans -Appendix E
Contamination and Landfill Gas The proposal identifies a long-term environmental management plan (LTEMP) that will be required for the recommended remediation strategy (asbestos encapsulation and for the management of LFG risks). Advice is recommended to be sought regarding the entities which are to be responsible for the implementation and enforcement of the LTEMP (NSW EPA, 2022c) prior to completion of the LTEMP, and the LTEMP will be reasonably, legally enforceable through a suitable mechanism. It is understood that the preferred enforcement mechanism will comprise	A draft LTEMP has been prepared which will need to be updated based on future staging requirements to deliver the project, and at that time will also list the responsible entity(s) for the implementation of the LTEMP.	Contamination and Ground Conditions Letter – Appendix RR

Summary of Issue Raised	Response	Reference / Appendix
a restriction / public positive covenant on the land title in accordance with the Conveyancing Act 1919 (s.88B), and noted that this mechanism will require further consultation given the potential subdivision of the land, and potential dedication of land to third parties (e.g. public park to Council). Further public notification is anticipated through inclusion in respective strata management plan(s). Management of an LTEMP is anticipated to be enacted through the respective strata bodies and Council (should land be dedicated). It is also noted at this stage the above mechanisms are not yet finalised and will require further consultation with respective stakeholders as part of a LTEMP.	The LTEMP will also require revision to reflect the actual remedial works undertaken, once completed. The LTEMP updates will all involve consultation with the relevant consent and responsible parties to ensure that all relevant stakeholders are on board with the dedications and responsibilities listed.	
The development proposes that during the delivery stages, the LTEMP will address potential contamination risks associated with the park by establishing monitoring requirements and ensuring the long-term safety of the public space. The Site Auditor will oversee the management plan to ensure all risks are appropriately mitigated before the park is handed over to the Council. The LTEMP will contemplate any requirements by Council, and may include items such as a Site Audit Report and Statement stating that the dedication land is suitable for intended use and any agreed operational fund designated for park maintenance, environmental monitoring, and other remediation improvements. The cap and contain strategy, and the landfill gas (LFG) mitigation system will need to be further considered by detailed development plans and detailed remediation specifications that have not yet been completed by the proponent. Even though the risk posed by the development has been summarised by the proposal as compliant with the relevant guidelines and legislations, uncertainty on the impact of the risk because of the regenerating nature of the LFG remains. As part of the passive management systems of the LFG, periodic inspections will be required by designated personnel. There will be an ongoing monitoring requirement for this site, including the proposed parkland, due to the cap and contain strategy for the life of the development. The LFG poses a risk where the methane (CH4) might form an explosive atmosphere where it is kept in enclosed area. As such that, the buildings on the site are proposed to be constructed with protection membranes. The location of proposed service venting of the LFG is unknown at this point and there is no guarantee that the proposed parkland will not be affected by this risk. Based on the above information, Council's officers are of in the opinion that the risk associated with the dedication of the parkland is high and that Council should undertake the further review of the potential risk.	LFG risk to open space parkland is considered low in the absence of enclosed structures. The updated RAP provides further detail Updated RAP Douglas report regarding construction reference 84770.05.R.002.Rev2 dated September 2025 staging, including requirement for sequencing of remediation tasks and development of Stage specific remediation work plans (RWP), all to be endorsed for implementation by the Site Auditor. Agreed on requirement for ongoing monitoring of the cap to be specified in revisions to the PLTEMP, ie, based on respective enforcement entity(s). Sub-slab venting would be at the edge of the building slabs (ie, with each structure including a high permeability drainage layer beneath the slab / membrane to prevent localised accumulation of gases) and would not extend into the parkland. Capping of the parkland for asbestos contamination would allow for passive diffusion / venting of any residual gases, noting the absence of enclose structures this would not pose a risk for site usage. As noted in response to comment CC-14-2, further detail is to be provided for each stage in supplementary remediation works plans endorsed by the Site Auditor.	Contamination and Ground Conditions Letter – Appendix RR
Proposed Public Spaces Council would support an improved access between the site and the Holroyd Sportsground. Owners consent from Council and Sydney Water for the construction of the bridge across A'Beckett Creek and to the sportsground has not been obtained. The proposed crossing is envisaged to interlink the existing bicycle path tracing on the northern boundary of the Holroyd Sportsground and will improve access to the public park and retail offering around the forecourt. As the parkland is tucked away within the centre of the development site, without the connection to the Holroyd Sportsground, such location will not be directly accessible by the public given that the site is isolated from all boundaries, except from Crescent Street. While the concept plans provided (Appendix P : Landscape Plan_1, Landscape Plan_2) provide a further level of detail from the initial application, further detail is required to assess the design offering for proposed public open space areas including parkland, plaza and streetscape areas. This includes a play equipment plan and schedule, furniture and fixtures palette and schedule, further cross sections, renders and construction details. This level of detail is needed to assess compliance and alignment with Council's public space standards, service offerings, strategies and maintenance requirements.	Only Council's land owner consent is required for the proposed bridge across A'Beckett Creek. Council by email dated 19th September 2025 (as noted above) has provided in-principle approval for the bridge based on the revised design documentation submitted. BG&E Bridges team prepared a concept bridge design which has been issued to Cumberland Council and obtained in-principle approval. This concept demonstrates that a bridge connection across A'Beckett Creek is feasible and can safely accommodate both pedestrians and cyclists, consistent with the recommendations of the State Design Review Panel to strengthen permeability to surrounding public open space. Council, as landowner of the adjoining land and waterway, will be consulted further through the detailed design process and further approvals obtained as land owner prior to construction. The proposed connection will: ▪ Interlink with the existing cycleway on the northern edge of Holroyd Sportsground;	

Summary of Issue Raised	Response	Reference / Appendix
	▪ Provide improved access to the site's parkland and retail forecourt, ensuring the space is highly accessible to the broader community; ▪ Align with the project's public domain strategy and the landscape design vision to create a continuous green link across the creek and sportsground. The applicant is committed to working collaboratively with Council, and relevant agencies to progress the design, obtain required consents, and deliver the bridge as an integral part of the site's public domain works.	
The design treatment of the central boulevard where it meets the public space offering doesn't provide a strong connection or entry threshold. There is no direct visual or pedestrian link from the boulevard to the open turf area. Currently the main pedestrian entrance into this space is obscured from the street behind Building 5. A stronger connection and arrival threshold to the public space offering would make it discoverable and accessible to both residents and the public.	While the communal lawn is not directly seen from Crescent St, the boulevard of trees and continuous footpath connects the shared road to the communal turf area, the direct view from the boulevard offers an inviting glimpse of the communal play area - views to the communal lawn opens up as the shareway becomes the pedestrian corridor. The new levels of the plaza and park allow for a transparent interaction between the street front and the open turf areas.	Revised Landscape Report – Appendix J
Landscape details adjacent to the A'Becketts Creek channel must demonstrate compliance with current Sydney Water fencing policy and guidelines for new and replacement fencing in public areas around open stormwater channels and SQUIDS.	The fencing requirements adjacent to the A'Becketts Creek channel have been reviewed. While the channel is a Council asset, the Sydney Water fencing policy and guidelines for new and replacement fencing around open stormwater channels will be adopted as the benchmark. Final design and documentation will incorporate these guidelines during the detailed design stage. (Refer to Plan 1100)	Revised Landscape Report – Appendix J
Note that the Connecting with Country Report (Appendix Q) has been provided and that a Connection to Country opportunities plan (Page 27 22-905 Crescent Parklands| SSDA | Issue D) has been provided showing opportunities for implementation. As these are developed, further detail will be needed for assessment, to see how they are integrated, managed and maintained in a public space environment.	Noted	N/A
The vehicle circulation plan (Appendix P Page 28 22-905 Crescent Parklands| SSDA | Issue D) should show route of maintenance vehicle access to RE1 land, it is unclear how maintenance vehicles would access the turf area and play space area to perform routine maintenance tasks.	Traffic modelling has been undertaken to mitigate the impacts. This has been done in consultation with Transport for NSW. The modelling has been included in the traffic assessment and shows that the upgrade of the intersection of Crescent Street and Woodville Road will mitigate the impacts.	
On site soft landscaping capping approach (as proposed in the RAP) within public open space has ongoing future implications for Council on the maintenance and upgrade of installed assets when they are due for renewal and is not supported. Should the proposal progress, detailed design of proposed public open space areas should be further developed for approval in consultation with Council. It is recommended that this requirement is included in the conditions of consent should the development be recommended for approval.	Off-site disposal of all contaminated fill in the park areas (as known or likely to contain asbestos in soils) is not considered an economical or environmentally sustainable option. Delineation of asbestos impacts was considered not practicable by Douglas and the Site Auditor. The alternate capping option provided in the RAP is for hardstand capping which is not likely a suitable option for the proposed public spaces. The minimum soft capping in the RAP could be increased such that surface landscaping is not a critical part of the cap, which may facilitate more routine upkeep / maintenance requirements. A thicker cap would also more readily accommodate any installed assets above the retained asbestos contaminated soils. Alternate options to dedication of the park are outside the scope of the Douglas investigations / reports.	Contamination and Ground Conditions Letter – Appendix RR
Stormwater Management	There are two issues raised within the issue.	Revised Stormwater Management

Summary of Issue Raised	Response	Reference / Appendix
The buildings (Building 4, 5, and the parking area under the central block – phase 2) are proposed over the existing drainage easement and stormwater pipe/conduit that runs across the subject site. The encroachments into the drainage easement and construction over the existing stormwater pipeline is not supported. The structure must be clear of the Council's drainage infrastructure. The sub-catchment area for each OSD system associated to the OSD system should be delineated on the plan and the area shown in m². The OSD design calculation summary sheet for each of the OSD systems should also be provided. The provision of OSD storage for each catchment must be based on the sub-catchment area. The information provided is incomplete. The cross-sectional details of the OSD tanks including the levels and storage volume have not been provided. Based on the available information, the available OSD storage volume appears to be insufficient. Particularly the available OSD storage volume from the OSD tank 2 appears to be 345m², noting that average depth of 0.7m only based on the slab inverts levels which varies from 12.3m to 12.55m. The average depth of 1m and storage volume of 410m³ could not be comprehend. All stormwater runoff should be directed into the High Early Discharge (HED) control pit/chamber to maximise the efficiency and functioning of the OSD system.	1. Construction over Easement The structural team has endorsed the construction over the easement by ensuring the building sits on foundation piles that are found below the easement, ensuring the culvert is not loaded. 2. OSD Catchment The OSD tanks have been redesigned to capture each stage independently. This has been documented in the civil package attached in Appendix (a) The site has undergone a significant redesign; the OSD tanks have been redesigned to be built corresponding to each stage separately. All tanks have been redesigned to be in line with the staging plan of the site. Cross sections are provided to highlight the water depth and the volume required for each stage. In line with UPRCT Handbook Revision 4, BG&E have opted to use a dual orifice outlet to maximise the efficiency of the OSD system.	Plan - Appendix DD
Pedestrian Access to Retail and Commercial Premises Pedestrian access to retail and commercial premises for pedestrians arriving to Woodville Road is unacceptably poor. Footpath levels proximate to the M4 on ramp intersection are around RL 10.3. By comparison, the retail level and commercial lobby are at RL 15.15. The 4.85m difference prevents convenient and diminishes connectivity with retail and commercial uses.	The design changes place a strong emphasis on improving the pedestrian experience across all stages. A key strategy has been to minimise the number of ramps while ensuring clear sight lines from access paths to the main lobbies. The adjustment of the ground level from RL 15.00 to RL 13.00 further enhances walkability, providing a more seamless and accessible movement network throughout the site. In addition, all podium designs have improved the pedestrian experience using the following considerations: 1. Human scale - Every building entry includes a large lobby space or a double height architectural gesture. Stage B and C include a series of courtyards acting as a transition between the Building and the pedestrians walking along the shared road. 2. Street activation - Stage A includes a large retail frontage offering supported by a pedestrian friendly connection to a park. Meanwhile, Stages B and C offer amenity spaces connected with minimum gradients and rich landscaping. Refer to Landscape documentation.	Revised Design Report-Appendix F
Podium Design The podium along Woodville Road fails to provide a human-scale urban environment. Sleeving the podium with active uses to enhance street-level interaction, reduce the perception of bulk and to improve the pedestrian experience should be considered. Doing so is justified on a first principles basis and additional would be consistent with DCP provisions.	It is not feasible to sleeve this frontage with active uses for two key reasons: 1. Servicing Requirement – This location must accommodate supermarket and podium servicing, making active frontage incompatible with operational needs. 2. Acoustic and Amenity Constraints – Woodville Road presents the poorest acoustic conditions on the site. Introducing residential or other sensitive uses here would compromise amenity. Furthermore, pedestrian activity along Woodville Road is limited, so active uses in this location would not achieve meaningful engagement. Instead, the amended design improves the pedestrian environment through: - A masonry podium treatment with potential for public art, articulated in bays to break down bulk. - Ventilated plant and BOH areas concealed behind consistent angled screens, creating visual variation when viewed in motion. - Reduced Ground level from RL 15 to RL 13 to strengthen pedestrian connectivity.	Revised Design Report-Appendix F

Summary of Issue Raised	Response	Reference / Appendix
	- Enhanced landscape treatment with graded footpaths and planting to soften the interface. This approach achieves a balanced outcome - acknowledging operational and acoustic realities - while still delivering an improved pedestrian realm along Woodville Road.	
Stormwater Quality / Water Sensitive Urban Design (WSUD) Measures The provision of water sensitive urban design (WSUD) measures should be demonstrated by MUSIC model. No such model have been provided demonstrating compliance with the pollutant removal target in accordance with Table 5 (section 2.5) of Cumberland DCP 2021 Part G4. The MUSIC model should be consistent with and reflect the treatment system components (water quality treatment devices) as proposed and shown on the plan. The provision needs to be re-assessed, and further comment will be made upon receipt of the MUSIC model.	MUSIC Modelling has been completed in line with the requirements of the Cumberland Council. The model is provided as part of this submission, which highlights the treatment targets achieved and the treatment devices used	Revised Stormwater Management Plan - Appendix DD
Traffic and Movement It is unclear in the documentation that road design mitigates traffic generation created by the development and will burden the capacity of Crescent Street. Further information is required for the Department to consider this, as it is a critical issue for the safe and effective operation of the site should the development application be recommended for approval. Council believes that some form of public access is required through the internal road network for the park and non-residential uses, either through a right of way or dedication of the relevant road to Council. Discussions with Council and the applicant on this matter are ongoing. Council requires a commitment for the provision of intersection upgrade works at the intersection of Pitt Street and Walpole Street, Merrylands, to provide additional road intersection capacity in response to additional traffic generated by the development. This could be in the form of a condition of consent or included in a Planning Agreement between Council and the applicant. Council also required a commitment for the provision of walking and cycling infrastructure upgrade to support continuous connections between the site and Merrylands Station, to provide alternate transport options in response to additional demand generated by the site. This could be in the form or a condition of consent or included in a Planning Agreement between Council and the applicant.	The project has been working with Transport for NSW for over 7 years on this project to mitigate the impacts on the road network. Substantial traffic modelling was required to provide TfNSW comfort that the impacts could be mitigated, The impacts on the road network will be mitigated through additional traffic lanes on Crescent Street, the introduction of a shuttle bus service to Harris Park and Parramatta and travel demand management directed by a Green Travel Plan. The internal road network has been designed to provide access for both residents and the wider community, including visitors to the public park and non-residential uses. The proponent acknowledges Council's position that some form of public access is required, either by way of a right of way or dedication of the relevant road to Council. Discussions on this matter are ongoing with Council to determine the most appropriate mechanism. The applicant is open to providing a legally enforceable arrangement to ensure ongoing public access to the internal road network where required, while also retaining the ability to manage traffic, safety and servicing for the precinct. The final approach will be agreed with Council prior to the determination of the SSDA. The Transport Impact Assessment (TTPP, Jan 2025) assessed the traffic and parking impacts of the development. The assessment concludes that the additional traffic generated by the proposal can be accommodated within the surrounding network, subject to the following mitigation measures: • Implementation of a Green Travel Plan. • Provision of a privately funded shuttle bus linking the site with Parramatta and Harris Park Stations. • Upgrade works along Crescent Street up to the intersection with Woodville Road. The assessment did not identify the need for upgrade works at the intersection of Pitt Street and Walpole Street, Merrylands. Accordingly, the applicant does not agree that such works are necessary to mitigate the traffic impacts of the development, and does not propose to deliver or contribute to works at this location under this SSDA. Council has requested a commitment to the provision of walking and cycling infrastructure upgrades to support continuous connections between the site and Merrylands Station.	Section 4, 6 of the of the Revised Transport Impact Assessment - Appendix P

Summary of Issue Raised	Response	Reference / Appendix
	The applicant commissioned The Transport Planning Partnership (TTPP) to prepare a detailed Active Transport Assessment (May 2025). This assessment reviewed the existing routes and identified a package of targeted upgrades to strengthen walking and cycling connections between Crescent Parklands and Merrylands Town Centre. Key recommended upgrades include: • Wayfinding signage at key decision points to clearly direct pedestrians and cyclists to Merrylands Station. • Provision of lighting on the off-road shared use path from Walpole Street to the M4 cycle route. • Installation of Shared Use Path signage along the identified route to confirm cycling access. • Line marking along Pitt Street between Neil Street and Terminal Place to delineate shared path usage. • A new shared path signal phase at the Neil Street / Pitt Street intersection to provide safer cyclist and pedestrian crossing. The applicant supports implementation of these measures, which will enhance active transport options to Merrylands Station and align with Council's Walking and Cycling Strategy 2024. The delivery mechanism for these upgrades may be secured by way of a condition of consent or through a Planning Agreement with Council.	
Siting of Car Parking Council has maintained at all times that parking on this site should be provided within a basement. The proponent proposes above ground parking which the Council presumes with a purpose of costly excavation and disposal of contaminated soil. That financial style objective should not outweigh the sound town planning objectives of providing basement parking. In particular: ▪ The presentation of 5 above ground levels of parking under Buildings 5 and 6 to Crescent Street creates an eyesore. ▪ The 5 levels of parking presented to Crescent Street create a very poor interaction with the public domain – an extensive, unattractive and dead frontage to the Street. ▪ Pushing parking above ground unnecessarily adds to building height and unnecessarily causes a breach of the development standard for height imposed by clause 4.3 of the LEP. ▪ Pushing parking above ground unnecessarily adds to building bulk in circumstances where the area of parking and associated circulation space that is needed to meet the parking requirements of the consent authority are excluded from gross floor area. Despite that exclusion, the proposal involves a significant variation to the development standard for floor space ratio imposed by clause 4.4 of the LEP. As previously outlined, if the area of the required parking and circulation space was taken into consideration, the effective bulk represents and extreme departure from the bulk envisaged by FSR controls.	The amended design has significantly reduced the visual and bulk impacts of car parking on Crescent Street. In Stages B and C, the number of above-ground parking levels has been reduced from seven to four, representing a substantial reduction in built form. The podium façades have been carefully redesigned to provide a cohesive architectural frontage, using a combination of vertical and horizontal screening devices that break down scale, introduce rhythm, and support passive surveillance where appropriate. To further soften the interface, the landscape strategy incorporates subtle mounding and layered planting along non-accessible façades, ensuring that Crescent Street is framed by greenery and clear sight lines to key building entries rather than blank walls. This integrated architectural and landscape response ensures that above-ground parking is not presented as a dead frontage but instead contributes positively to the public domain. Comparable precedents, such as the Boomerang Tower at Sydney Olympic Park, demonstrate that above-ground parking can be successfully integrated in constrained sites without compromising the broader planning objectives.	Chapter 08.02, 08.05 Revised Design Report-Appendix F
Lack of Building Identity The above ground parking treatment along Crescent Street severely limits the potential of the towers to address the Street. Proposed parking and access arrangements internally within the site arrangements likewise fail to create a sense of an address and identity. It further creates logistical problems, for example in having emergency vehicles, taxis, uber drivers and delivery drivers know where they are to go.	The amended podium designs significantly reduce built form impacts by lowering the above-ground parking in Stages B and C from seven levels to four. This reduction allows the towers to more clearly address Crescent Street and establish a stronger sense of identity. The architectural treatment of the podium façades has been reworked with integrated screening, articulation and landscaping, creating active and visually engaging frontages that frame tower	Chapter 08.02 Revised Design Report-Appendix F

Summary of Issue Raised	Response	Reference / Appendix
	entries. Each building now has a clearly legible entry sequence supported by forecourts, signage and landscape design, ensuring residents and visitors - including emergency services, taxis, and delivery drivers - can readily identify destinations. Together, these changes ensure the development presents a cohesive address to Crescent Street, strengthens wayfinding across the site, and enhances the overall legibility and character of the precinct.	
Uninviting Precinct Aspects of the development including poor pedestrian and cycle access from both Woodville Road and Crescent Street due to changes in level from those roads to what purports to be the ground floor levels of Buildings 1, 3, 5, 6, and 7 and the lack of permeability to the RE1 zoned land culminate in the site turning its back on public interaction and being an uninviting precinct for the public. The difference in levels between the lowest residential levels of Buildings 4, 5, 6 and 7 compared to the footpath levels along results in a disassociation with the public domain and negates access to internal paths for people on bicycles or in wheelchairs.	The amended design materially improves pedestrian and cycle access throughout the precinct. Key strategies include: Ground Plane Adjustment – The ground floor level has been reduced to RL 13.00 across all stages. This adjustment significantly reduces the need for ramping and creates a more consistent, walkable ground plane. Improved Connectivity – Pedestrian access paths have been rationalised with minimal ramp sequences and clear sight lines to building lobbies, enhancing legibility and safety. Inclusive Access – The revised design provides improved continuity for wheelchair users and cyclists, ensuring barrier-free movement within the precinct. Strengthened Public Domain Relationship – The lowered ground plane and updated access design better align the residential entries with the adjoining footpath levels, mitigating previous disassociation with the public domain. Collectively, these changes deliver a more permeable, welcoming and accessible precinct, countering the perception of an "uninviting" environment and ensuring stronger engagement with the surrounding public domain.	Chapter 05.05 Revised Design Report-Appendix F
Building Separation and Privacy The separation between various residential towers remains deficient in some areas to achieve privacy as sought by the Apartment Design Guide, culminating in poor residential amenity.	The amended design has reduced the overall building footprints, particularly within Stage A, resulting in increased building separation distances. These changes directly address the Apartment Design Guide objectives by improving visual privacy and ensuring better residential amenity. Updated plans (refer Drawing CP-AR-0-1103) confirm that separation distances have been improved, and where variations remain, the design incorporates façade articulation, window placement and landscaping measures to mitigate overlooking and support high levels of amenity.	Chapter 10 Revised Design Report-Appendix F
Parking Generally There is an absence of any motor cycle parking which is unrealistic, especially so for considering socio-demographics and the number of occupants associated with affordable housing. Each of the parking spaces should be numbered according to the land-use user group for clarity. In addition, parking space provision for each parking level for each Block (phase) should be presented in a tabular form for clarity. The architectural plan of parking area does not provide clarity for review of provision. The parking spaces and the aisle widths must be dimensioned appropriately for clarity. In addition, the finished floor level must also be shown on the floor plan and at each change of gradient. This includes the finished surface level at each change of gradient along the ramps. It is also noted that the parking spaces at lower basement for central block (Phase 2) appear to be used as dual land-use type (residential/ commercial). This raises concern for the security for the residential user group. The	The updated documentation includes full numbering of all parking spaces by user group (residential, retail, commercial, accessible, etc.). In addition, tabulated schedules for each car park have been prepared to clearly demonstrate parking allocation and compliance. These measures ensure clarity in reviewing the provision and make the plans straightforward to interpret. The updated parking documentation now includes full dimensioning of spaces and aisle widths to confirm compliance with design standards. Finished floor levels have been clearly annotated on each plan, including at all ramp transitions and changes in gradient, with finished surface levels shown for clarity. These updates ensure the parking layouts can be reviewed with confidence and provide the level of detail requested.	Architectural Plans-Appendix E • CP-AR-0-1200 • CP-AR-2-2200 • CP-AR-1-2200 • CP-AR-1-2201 • CP-AR-1-2200, 01, 02, 03, 04, 05, 06, 07

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residential parking area must be secured and controlled access. The commercial user access must not be allowed into the residential parking area. It is recommended that the parking spaces allocation for commercial use be provided in the vicinity of the commercial area proportionately for ease of access in this respect the majority of the commercial parking space be locate within the eastern side block (Phase 1). For safety/security the vehicular access to the residential parking area should secured and controlled. The parking area in particular the central block should have a restricted access to the residential parking area and not be accessible by commercial user type. There are several disabled parking spaces at each parking level for eastern side block (Phase 1) which do not comply with AS2890.6-2009. The location of security gate to the residential parking area at lower ground level for eastern side block results in obstruction free flow of internal traffic. The security gate should be relocated towards the parking area. The car park compliance drawings (Transport Assessment Report 3) indicates that there are several non-compliance matters as indicated on those drawing including the aisle width and the manoeuvring clearance requirements (Figures 13, 14, 15, 26). The unobstructed manoeuvring of vehicle while another vehicle in opposite direction must be demonstrated.	The parking layout has been amended to ensure a clear separation between residential and commercial user groups. Commercial parking is consolidated between Buildings 04 and 05 facing the park, while residential bays are located in secured, access-controlled areas with dedicated entry points. Controlled access measures, including security doors and separate circulation paths, prevent commercial users from entering residential parking areas. This approach addresses security concerns and ensures compliance with best practice parking design standards. Commercial parking has been allocated in close proximity to the commercial tenancies, with the majority of spaces located in the eastern block (Stage 1). Refer to updated plans CP-AR-1-2200, CP-AR-1-2201, and CP-AR-2-2200 for details. Commercial parking location is separate from residential levels. Stage A Level 1 only includes retail and commercial parking while other parking levels are exclusive to residents. Similarly, in Stage B, commercial bays are located outside the main car parking space. Stage A no longer includes a Lower Ground level. Access to residential car parking is at Level 2. Meanwhile, Level 1 car parking serves only retail and commercial uses. The parking layouts have been revised in response to the issues identified in the Transport Assessment Report. The amended design now: • Achieves Required Dimensions: All aisle widths and manoeuvring clearances have been updated to comply with the applicable Australian Standards. • Demonstrates Safe Vehicle Movement: Swept path analysis has been undertaken to confirm unobstructed manoeuvring, including scenarios where vehicles travel in opposite directions. • Improves Overall Efficiency: The layout refinements not only address compliance matters but also enhance legibility and ease of circulation within the car park. These amendments resolve the previously noted non-compliances and ensure the parking areas fully accord with the relevant design standards.	• CP-AR-2-2200, 01, 02, 03 • CP-AR-3-2200, 01, 02, 03
Waste Management Building 1 does not appear to be provided with any waste or recycling chutes. Waste storage areas at the car parking levels (or what are assumed to be waste storage areas, as the purpose of every room is not identified) are not sited for the convenient collection of waste, in most cases requiring paths of travel through parking spaces. It is unclear whether waste collection vehicles will be able to safely manoeuvre to collection points. Even if they can, they will disturb flows of traffic and create inconvenience for other users by blocking aisles while collection takes place. The design appears to be poorly thought out. The development should be planned with provision for the storage and collection of food and organic waste, noting the not too distant obligations for such waste.	The amended design incorporates a comprehensive waste management strategy that resolves the issues identified: • Chute Provision – All residential buildings, including Building 1, are now provided with waste and recycling chutes on every floor in accordance with best practice and regulatory requirements. • Dedicated Waste Storage Areas – Waste and recycling rooms are clearly identified on the updated car park and podium plans. Their locations have been rationalised to avoid conflict with parking spaces and to ensure convenient access for residents. • Collection Strategy – Waste collection vehicle manoeuvring has been tested through swept path analysis, confirming that vehicles can access designated collection points safely and efficiently. Collection will occur at dedicated service areas, minimising disruption to traffic flows within the car park.	Waste Management Plan (Operational) – Appendix Q

Summary of Issue Raised	Response	Reference / Appendix
	• Food and Organic Waste – Storage capacity for organic waste has been incorporated into the revised design, consistent with emerging regulatory obligations for food and organic waste separation. This integrated approach ensures that waste management is practical, convenient for residents, and fully compliant with Council and EPA requirements, while avoiding traffic and safety conflicts during collection. The Operational Waste Management Plan proposes a single chute for general waste, with space for 2 x 240L bins on each residential level in the current GA set of plans. For the rotation of bins between the residential chute discharge rooms and the residential bin collection room, rotations will occur periodically. This is a common practice and should be deemed appropriate for waste collection and disposal. Please refer to the scope of traffic for further details on the collection of waste versus the positioning of the vehicle during collections. Food organics and garden organics have been provided for in our report and the plans.	
Salinity The site is marked as potential moderate salinity on the Salinity Map. A salinity investigation has not been provided to enable assessment against clause 6.9 of the LEP.	The Detailed Site Investigation Report (Appendix BB) submitted with the SSDA in January 2025 include an acid sulfate soils assessment and a salinity assessment. Based on the extent of proposed excavation, no significant risk related to salinity from natural material (soil and rock) is anticipated for the development. Therefore, no salinity management is required. Refer to the Detailed Site Investigation Report (Appendix BB of the EIS) and the Revised Mitigation Measures for further details on strategies to be incorporated to mitigate the effects of any potential salinisation. The Geotechnical Assessment (Appendix Y) submitted with the SSDA also notes that the risk of acid sulfate soils being present is considered low. Therefore, no management of acid sulfate soils is currently required. Should any different soils or indicators of acid sulfate soils (e.g. sulfidic odours) be identified during deeper excavation (e.g. piling), then further assessment would be recommended.	Geotechnical Assessment Detailed Site Investigation Report - Appendix BB in EIS
Updated Arboricultural Impact Assessment The applicant should submit an updated Arboricultural Impact Assessment for consideration as the building layout and site plan has changed significantly from the plan first proposed when the site was under assessment for the previous development application. Based upon, the proposed building layout, a number of trees could potentially be retained along the Crescent Street, frontage as well as other trees throughout the site. The report should reflect the update layout and make recommendation around which trees require removal, and which could likely be retained. This may require root mapping by the arborist to take place to determine the extent and location of trees that have the potential to be retained. Due to the high number of trees requiring removal under this proposal and given the large nature of the combined sites, the applicant should ensure that sufficient replacement planting occurs to ensure where possible, the removal of the trees is offset with supplementary suitable advance plantings.	An updated AIA has been submitted, reflecting the revised building layout and site plan. The assessment reviews all trees on site and along the Crescent Street frontage, identifying those that can be retained and those considered retention-incompatible due to cumulative impacts. Where feasible, such as the trees growing in the culvert, retention has been prioritised. The proposed works include road widening along Crescent Street, which renders trees along this street retention-incompatible. In addition to the road widening works, this frontage would be subject to cut and fill, construction access, site access, construction and landscaping. Root mapping has not occurred. Given the high impact of the road widening works and cut and fill, root mapping may provide unnecessary and costly if proceeding with the current design.	Revised Arboricultural Impact Assessment – Appendix K

Summary of Issue Raised	Response	Reference / Appendix
	The use of root mapping to investigate the possibility of tree retention is a useful technique when impacts are less than 30% or for other reasons. Other reasons are situations where unusual soil conditions may cause asymmetrical root growth. When trees are growing without any obstacles or neighbouring trees or large shrubs in relatively uniform soil the tree roots will typically grow somewhat evenly on all sides of the tree. The general location of tree roots are generally relatively easy to predict in these simple situations. However, when trees roots are growing where there are obstacles or other trees or local differences in water availability in the soil, the tree roots may grow very asymmetrically. In these unusual situations there is the possibility of retention of trees with impacts well above 10 – 20%. There were no obvious locations on the site where a tree is proposed to be impacted above 20% but root mapping may demonstrate that the tree can be retained. The landscape report (Arcadia, 2025) discusses the proposed plantings and schedules in detail. A high level analysis of the proposed canopy coverage increase, and appropriate soil volumes are briefly discussed in the AIA.	
Environmental Health Mechanical ventilation systems are to be designed to be capable of accommodating exhaust requirements for all ground floor commercial units. Information should be provided for how this will be achieved without affecting the amenity of the public domain or residential units.	The design considers localised filtration for the ground floor exhaust systems. Detailed analysis of area and volume to achieve a high level of odour control has been incorporated into the design to allow detailed system selection.	Appendix FF – Revised Infrastructure, Delivery, Management and Staging Plan
A Plan of Management should be prepared for the development that addresses operational requirements of the development, traffic and parking management plan, cleaning of communal areas, grease trap requirements, noise management and a complaints register (internal and external).	To be provided prior to occupation.	N/A
No details of potential regulated systems under the NSW Public Health Act and NSW Public Health Regulation have been provided. Clarification as to whether any water cooling or warm water systems (including thermostatic mixing vales) will be incorporated into the development should be provided. The location of grease traps for food premises and their collection points have the potential to cause odour and amenity impacts. Locations should be identified and assessed. The finalised version of the Long-term Environmental Management Plan must be provided to Council once completed so that it can be added to Council's mapping system and applied to all planning certificates in future.	The are no proposed centralised water cooling and warm water systems. Compliance with AS3500 for hot water temperature regulation for general residential (via tempering valve) and any accessible areas (via thermostatic mixing valve). We note that grease arrestors have been designed to be in ground, located in areas such as loading docks and general back of house locations. These locations can be shown on the Stage A LG & G floor plans.	Appendix FF – Revised Infrastructure, Delivery, Management and Staging Plan
Planning Agreement The EIS indicates that a Planning Agreement is to be undertaken between Council and the applicant. Initial discussions have been undertaken, and further discussions are required on the matter. The current proposal does not adequately address the matters that Council are seeking clarify on regarding the proposed public open space (whether part of the development with arrangements in place for public access or through dedication), public road access (either by right of way or through dedication), provision of local infrastructure as outlined in the DCP, and shuttle bus between the site and Merrylands.	Council's request for a Planning Agreement is noted. Since lodgement of the EIS, Council has advised that it no longer wishes to accept dedication of the proposed public open space. In this context, the applicant proposes to retain ownership of the park within the strata scheme while ensuring it remains publicly accessible. Given this position, the primary driver for a Planning Agreement (the dedication and transfer of the park) no longer applies. Other matters raised by Council are appropriately addressed through the SSDA and can be secured via conditions of consent, including:	N/A

Summary of Issue Raised	Response	Reference / Appendix
Should the development be recommended for approval, Council requests that a condition of consent be included that a Planning Agreement be prepared, negotiated and executed between Council and the applicant on these matters, and that the Planning Agreement be executed prior to the issue of the first Construction Certificate.	▪ Provision of a shuttle bus service, as recommended in the Transport Impact Assessment (and detailed within the Green Travel Plan). ▪ Upgrades to Crescent Street, including the widened frontage and new internal access road. ▪ Arrangements for public access to non-residential uses and the park through rights-of-way to be secured on title. On this basis, the applicant does not consider that a Planning Agreement is necessary or justified. Instead, the matters identified by Council can be more efficiently and transparently secured through conditions of consent.	
City of Parramatta Council		
New Cumberland Rail Line Council recently (24 January 2025) made a submission to DPHI concerning the exhibition of an Explanation of Intended Effect (EIE) for a proposed amendment to *State Environmental Planning Policy (Transport and Infrastructure) 2021* (SEPP) relating to the New Cumberland Rail Line Future Underground Infrastructure Corridor. In its submission, Council officers expressed support for Transport for NSW's intention to preserve a corridor for the New Cumberland Rail Line through Parramatta CBD, as this corridor protection aligns with Council's long-held objective of a rail connection between Parramatta and Epping. Council officers note that the location of the proposed Crescent Parklands development may potentially impact development of the proposed New Cumberland Rail Line at its southern end. Whilst Section 1.3.1.6 of the Environmental Impact Statement (EIS) indicates a meeting has occurred between the proponents, DPHI and Transport for NSW (TfNSW), it is not clear whether or how any potential conflicts would be managed. The EIS includes the statement, *"During the meeting, the application was acknowledged, and TfNSW confirmed their deliberate decision to terminate the underground rail within the Parramatta LGA to avoid impacting the site. Both TfNSW and the DPHI are now considering the possibility of realigning the corridor to eliminate any potential future impacts on the site."* City of Parramatta Council officers recommend that any potential conflicting objectives between the planned New Cumberland Rail Line and the proposed Crescent Parklands SSDA be resolved through an open and transparent process before making final amendments to the SEPP to protect the future rail corridor and determination of the SSDA by DPHI.	The Environmental Impact Statement identifies the extent of the New Cumberland Rail Line. During meetings held with representatives from DPHI and Transport for NSW, it was confirmed that there would be no direct proposed impact of the new Cumberland Rail Line to the site. It is also noted that concurrence is already triggered. No further submissions from TfNSW have been made on this matter. Therefore, it is concluded that the proposed development has no impact on the draft SEPP Amendment.	N/A
Parking and Traffic Congestion The proposed development is located in close proximity to the major intersections of M4, Parramatta Road, Church Street and Woodville Road. The proposal will result in approximately 1,600 parking spaces and a traffic generation of up to 771 inbound trips in the evening peak across a two hour window. This is a concerning increase in traffic of which the vast majority will be travelling through this intersection. Further to this, it is apparent that the proposed development will result in increased congestion along Parramatta Road, including local roads connecting to Parramatta Road which will create additional delays for residents in the Parramatta LGA. Accordingly, consideration should be given as to whether this site is suited for a development of this scale without other measures being taken to improve the flow of traffic in the surrounding state road network. The TIA must provide further detail on the impacts of this volume of traffic and suggested mitigation measures.	The project team has been working with Transport for NSW for over 7 years on this project to mitigate any potential impacts on the road network. Substantial traffic modelling was required to provide TfNSW comfort that the identified impacts could be mitigated. The impacts on the road network will be mitigated through additional traffic lanes on Crescent Street, the introduction of a shuttle bus service to Harris Park and Parramatta, and travel demand management directed by a Green Travel Plan (**GTP**). Given that the land was rezoned for high-density residential use and was supported by detailed traffic modelling at the time, there is no basis to contend whether the site is suitable for development. The suitability of the site for development was determined at the rezoning stage, with agreed suitable mitigation measures identified agreed to the satisfaction of TfNSW.	Revised Transport Impact Assessment - Appendix P
Site Access		Revised Transport Impact

Summary of Issue Raised	Response	Reference / Appendix
At the SEARs stage, Council raised concerns regarding motorists travelling southbound in Church Street, using the existing driveway in Cresent Street to perform a U-turn to access the M4 in the westbound direction. This behaviour is likely to continue, however, with the proposed development in place, there may be increased conflict with pedestrians on the footpath and vehicles exiting the driveway. The proposal now includes widening of Crescent Street to have 2-3 eastbound lanes past the development's driveway and a dedicated right turn lane into the site. This will likely result in the continued use of this section of road for motorists to perform a U-turn. Further to this, it is apparent that the queuing in Crescent Street in the AM peak will extend beyond the eastern driveway post development. As such, there will be instances where motorists are turning right out of or into the driveway between queued traffic which will significantly impact their sight lines. Given this, the TIA must further consider the road safety implications of their development and propose measures to minimise the impacts on road safety. It is suggested that the eastern driveway be made left in left out via a median island and that a roundabout be installed at the western driveway to allow motorists to safely perform a U-turn.	Since the site has been disused, the driveway for the site has been used by vehicles from the north that are trying to enter the M4 Motorway travelling westbound. They do this because the right turn from Church Street to the M4 Motorway has been banned and this is an attractive route. It is estimated that once the site becomes operational, the driveway will no longer become attractive and drivers will find other ways to turn around, including using the roundabout in Walpole Street or finding other ramps to enter the M4 Motorway. To further address this issue, it is recommended to provide no U-Turn at the driveways and may require enforcement to prevent drivers from performing a U-Turn at this location.	Assessment - Appendix P
Active Transport Active transport links are considered essential to service the proposed development and particularly to link to Harris Park Train Station. In this regard, it is noted that there is a missing signalised pedestrian leg in Boundary Street at the intersection with Church Street and Raymond Street. Accordingly, the TIA must perform an assessment of a future upgrading of this traffic signals at this intersection to improve pedestrian safety and connectivity.	The most direct route to walk to Harris Park Train Station does not use Church Street. The existing underpass under the M4 avoids Church Street and the signalised intersection. There is no clear nexus between this development and the provision of a pedestrian crossing at Boundary Street / Church Street.	Revised Transport Impact Assessment - Appendix P
Public Submissions		
Anonymous Individual (Submission ID SE-79915708)		
I am writing to provide my feedback on the Crescent Parklands Holroyd project. While I support the inclusion of affordable and social housing as part of urban development, I have significant concerns regarding the infrastructure and community impact of this proposal. Below are the key points I would like to raise. <u>Road and Traffic Congestion</u>: The road infrastructure in and around Granville is already under immense strain, particularly along Parramatta Road and Woodville Road. These areas experience heavy congestion during peak hours, and additional high-density developments will exacerbate this issue. Despite some existing public transport options, such as bus routes along Woodville Road, these services are insufficient to meet current demand, let alone accommodate the increased population from this development.	1. Traffic Modelling and Road Capacity The development's traffic impact was rigorously modelled using both SIDRA and Aimsun microsimulation tools, covering future scenarios up to 2031. The modelling demonstrates that: ▪ Traffic generated by the development can be accommodated within the surrounding network without unacceptable impacts. ▪ Intersection performance, even at peak times, remains within acceptable Levels of Service (LoS), with mitigations in place. 2. Upgrades and Infrastructure Commitments The project includes upgrade works along Crescent Street up to the intersection with Woodville Road, which will improve vehicle movement and capacity in the immediate area. These works were informed by both existing conditions and future traffic demand forecasts, including contributions from other approved developments in the vicinity. 3. Public Transport Accessibility and Mitigation Measures The site is well-served by existing public transport, including nearby train services at Merrylands and Parramatta stations, and bus routes along Woodville Road	Revised Transport Impact Assessment - Appendix P

Summary of Issue Raised	Response	Reference / Appendix
	A shuttle bus is proposed between the development and Parramatta/Harris Park stations to reduce dependency on private vehicles. A Green Travel Plan will be implemented to encourage sustainable travel choices, including cycling, walking, and public transport use. 4. Modal Shift and Travel Demand Management The development supports a mode share strategy aimed at reducing car dependency, particularly given its proximity to the Parramatta CBD. Bicycle parking and end-of-trip facilities are provided to support active transport alternatives. 5. Staging and Future-Proofing The traffic assessment accounts for cumulative development and future traffic growth through 2031. The project has been staged to progressively deliver infrastructure alongside new residents, ensuring that capacity is not exceeded as the population grows. Conclusion The proposal not only acknowledges existing congestion issues but also proactively mitigates its impacts through modelling, targeted infrastructure upgrades, a shuttle service, and sustainable transport measures. These interventions are supported by comprehensive technical evidence and align with broader strategic transport and housing policies. Therefore, the development is appropriate from a traffic and transport perspective and does not pose an unmanageable burden on local roads.	
<u>Lack of Proper Bus Stops on Woodville Road:</u> Woodville Road lacks adequate bus stops with proper facilities for commuters. This makes public transport less accessible and discourages its use as a viable alternative to private vehicles. Improvements in this area are critical to support any new development in the region.	The proposal is proposing shuttle buses from the site to local destinations to directly assist with promoting transport modes other than cars. Improved bus stops and services along Woodville Road should be addressed as part of Cumberland Council's proposed amendments along the Woodville Road corridor for increased residential densities.	Revised Transport Impact Assessment - Appendix P
<u>Parklands and Open Spaces:</u> While the proposal includes a new park and additional open space, the area is insufficient given the scale of the proposed development. Existing parklands in the area are not well-maintained, and adding more residents without ensuring proper upkeep of these spaces will diminish their usability for both current and future communities.	The submission raises important points regarding the adequacy and maintenance of parklands and open spaces in the context of increased population. These concerns have been carefully addressed through a landscape-led design process underpinned by the strategic objectives of both the NSW Government and Cumberland Council. 1. Substantial New Public Parkland Delivered On-Site The proposal includes over 23,000 m² of new publicly accessible open space across the site - comprising more than 60.8% of the total site area (37,877 m²). This significantly exceeds minimum standards and will directly contribute to addressing the shortfall of large parks (>0.5 ha) identified in Cumberland's Open Space and Recreation Strategy 2019–2029 Landscape Design.	N/A

Summary of Issue Raised	Response	Reference / Appendix
	2. High-Quality, Diverse and Inclusive Public Realm The design delivers a layered and inclusive open space network that includes: A central park at the heart of the site A new pedestrian and cycle bridge connecting to Holroyd Sportsground Open multi-purpose turf area, youth play spaces, adult gyms, native bush gardens, and a community boulevard These features support year-round passive and active recreation, social connection, and mental wellbeing across all age groups 3. Long-Term Maintenance Commitment The development is supported by a detailed landscape plan and a commitment to ongoing maintenance. The parklands and open spaces are being delivered as part of a comprehensive public domain and infrastructure package, with ongoing responsibilities clearly defined to avoid high levels of maintenance. This includes robust planting strategies, durable materials, and dedicated infrastructure to reduce degradation and support long-term upkeep. 4. Strategic Ecological and Urban Cooling Outcomes The proposal restores biodiversity through the planting of endemic species and contributes to Council's Urban Tree Strategy 2020 by increasing canopy cover across the site. Over 8,500 m² of canopy will be delivered, helping mitigate urban heat and ensuring comfort and resilience for future users. 5. Integration with Council and State Policy Objectives The project aligns with the NSW Government's Greener Places framework, the Cumberland Development Control Plan 2021, and Better Placed design principles. These policies emphasise green infrastructure as essential to liveability in growth areas - a goal this project meaningfully advances. Conclusion Rather than placing pressure on existing parklands, this development meaningfully expands the open space network, improves walkability and connectivity, and delivers a high-quality, maintainable public realm that will support both new and existing communities. The approach prioritises ecological integrity, cultural values, community wellbeing, and long-term stewardship.	
Impact on Public Infrastructure The surrounding suburbs, including Merrylands, Granville, and Parramatta, are already experiencing significant pressure from high-rise developments. This has led to overcrowding in schools, local hospitals, and public transport services such as buses. The addition of up to 1,227 apartments will further strain these facilities unless substantial investments are made to expand capacity.	The proposed development is addressing housing supply which is a high priority of the NSW Government. The proposed development will contribute significant monetary contributions through State and Local contributions which will support further infrastructure improvements over time and as demands grow with the increasing population.	N/A
Parking Challenges High-density developments often lead to parking shortages.	The proposed development has been subject to a comprehensive traffic, access and parking assessment. This assessment confirms that the development complies with all relevant statutory parking requirements and provides an appropriate supply of parking across all stages.	Revised Transport Impact

Summary of Issue Raised	Response	Reference / Appendix
Without adequate planning for resident and visitor parking spaces, this project risks creating significant parking issues in surrounding streets.	▪ Each building includes its own integrated podium-level parking, ▪ Car parking has been distributed across the development in a staged and balanced way, aligned with yield, use type (residential, commercial, retail), and phasing. ▪ In addition, the development incorporates several measures to reduce parking pressure over time: – A Green Travel Plan will support reduced car dependency by encouraging use of walking, cycling, public transport, and car share. – A private shuttle bus will link the site with Parramatta and Harris Park stations, increasing accessibility without requiring private vehicles. – End-of-trip facilities and secure bike parking are provided to promote active transport modes. ▪ The project has also been carefully designed to contain internal access roads and loading areas within the site boundaries. This will avoid impacts to Crescent Street and surrounding neighbourhood streets, ensuring that local parking availability is not adversely affected. In conclusion, the parking provision is both adequate and policy-compliant, and the design incorporates multiple strategies to avoid overflow impacts on the surrounding area.	Assessment - Appendix P
<u>Law Enforcement Capacity</u> A population boom in the area will place additional demands on local police services. It is unclear how law enforcement resources will be scaled to address potential increases in crime or community safety concerns associated with a larger population.	The concern raised regarding increased pressure on local police services due to the projected population growth as a result of the proposed development is acknowledged. This issue has been considered and addressed within the Crime Prevention Through Environmental Design (**CPTED**) Assessment submitted as part of the SSDA (as originally lodged). The design team consulted directly with the Cumberland Police Area Command prior to lodgement of the SSDA on 12 September 2024. Police confirmed that while current crime trends in the area are relatively minor, some opportunistic crimes have been observed in other growth areas. They noted that crime is more often associated with poor access control rather than with density itself. The proposal integrates specific access control measures and design strategies recommended by police to mitigate these risks. These include surveillance, access control, territorial reinforcement, and space/activity management. The development not only recognises the potential implications of population growth on community safety, but proactively mitigates these impacts through best-practice design, direct engagement with local law enforcement, and integration with Council's broader strategic safety objectives. These measures ensure that increased density is accompanied by enhanced environmental safety and operational readiness.	CPTED Assessment – Appendix KK
In conclusion, while I acknowledge the benefits of affordable housing and community facilities proposed in this development, it is critical that these issues are addressed comprehensively before proceeding with the project. I urge the Department to prioritise improvements in road infrastructure (including proper bus stops), public transport capacity, parkland maintenance, and public services to ensure sustainable growth in Granville and surrounding areas.	As noted above	Revised Transport Impact Assessment - Appendix P Revised Design Report - Appendix F

Summary of Issue Raised	Response	Reference / Appendix
		Revised Architectural Plans - Appendix E
Anonymous Individual (Submission ID SE-80215462)		
The Greater Parramatta Future Underground Rail Corridor (New Cumberland Line) alignment must be resolved prior to the Crescent Parklands development proceeding. The only feasible location for the realigned New Cumberland Line tunnels is adjacent to Crescent Parklands at the current Holroyd Sportsground site. The Crescent Parklands Environmental Impact Statement and current assessments related to transport, traffic, open space, and other amenities will be rendered out of date once the New Cumberland Line alignment is finalised. Crescent Street is likely to be separated in half with the new rail line leaving the existing rail corridor through Crescent St to reach either the Crescent Parklands or Holroyd Sportsground site for tunnelling, hence the traffic assessment of Crescent St being a throughfare from Walpole St to Woodville Road is inaccurate. Crescent Street and Crescent Parklands will become a cul-de-sac off Woodville Rd only, as there is a lack of physical space for a rail bridge from the southern side over Crescent St because of its proximity to the entrance to underground tunnels to the north of Crescent St. Additionally, the New Cumberland Line is proposed to be a standalone metro service incompatible with existing Sydney Trains. The New Cumberland Line metro will likely be a 3 carriage single-deck metro (down from the current 8 carriage double deck Sydney Trains) and also result in no direct rail connection between Merrylands to Central via Granville and the abandonment of the Y-Link between Merrylands - Harris Park. The changes to the rail network from the New Cumberland Line have not been factored into planned population increase and traffic/transport assessment for the Crescent Parklands proposal. Additionally, there is probity issue regarding why Transport for NSW has not acquired the Crescent Parklands site as the New Cumberland Line has been planned since the early 2010s. While the public exhibition of the Greater Parramatta Underground Future Rail Corridor was only in November 2024, Transport Minister Andrew Constance received Ministerial Briefings on the New Cumberland Line corridor in 2020-2021, the New Cumberland Line was published in the NSW Future Transport Strategy in 2018 & 2020, and the origins of the New Cumberland Line can be traced back to Transport for NSW planner David Gray in 2014-15. The merits of the New Cumberland Line in removing the Y-Link between Merrylands - Harris Park is dubious at best and also the case has not been made to justify replacing Sydney Trains (8 carriage double-deck) with 3 carriage single-deck metros on the Cumberland Line; but were the Department of Planning to approve Crescent Parklands at this point in time before the New Cumberland Line is finalised, this would be unnecessarily increasing the cost of the New Cumberland Line and delaying the future expansion of Sydney's rail network.	The Environmental Impact Statement identifies the extent of the New Cumberland Rail Line. During meetings held with representatives from DPHI and Transport for NSW, it was confirmed that there would be no direct proposed impact of the new Cumberland Rail Line to the site. It is also noted that concurrence is already triggered. No further submissions from TfNSW have been made on this matter. Therefore, it is concluded that the proposed development has no impact on the draft SEPP Amendment.	N/A
Anonymous Individual (Submission ID SE-80439212)		
Thank you for sending the letter seeking residential comments on the adjacent development. I have reviewed the exhibition attachments and would like to provide three comments regarding transport risks and issues: ▪ The development site is near the railway, with most buildings, occupied by a majority of people, located close to the tracks. The railway curves and bends toward the site. Has a derailment risk assessment been conducted for the development?	A derailment risk assessment has not been conducted for the development and is not considered relevant at this stage.	N/A

Summary of Issue Raised	Response	Reference / Appendix
▪ The prioritised infrastructure upgrades are well illustrated around the development site, particularly in Appendix U - Transport Impact Assessment 3. However, no upgrades are proposed for the pedestrian walkway under the railway bridge (see attached photographs). This walkway is quite narrow and directly adjacent to fast-moving traffic. I recommend installing barriers or balustrades to improve pedestrian safety.	The priority for the project is to focus on infrastructure upgrades as outlined in the Transport Impact Assessment. While the importance of pedestrian safety is important, the current scope does not include modifications to the walkway under the railway bridge.	N/A
▪ The pedestrian walkway on the eastern side, from Merrylands Station to Crescent Parklands, is quite long (approximately 1.5 – 2 km). I propose constructing a pedestrian overbridge across the railway to enhance connectivity between Crescent Parklands in the Holroyd area, and the eastern side of the railway near Granville (see attached photograph - Page 2).	The project focus remains on the prioritised infrastructure upgrades as outlined in the development plans.	N/A
D.Harish (Submission ID SE-80640957)		
The proposal would create more congestion and problems in the area with more traffic leading into the M4 and Parramatta Road. This would also impact already under strain public transport facilities to the Woodville Road Area.	See above but TTPP has been working with Transport for NSW on the modelling since 2019 and they gave concurrence of Planning Proposal stage in 2023 - there has been no increase in development traffic since that assessment. The proposed development has been subject to a detailed Transport Impact Assessment (TIA) prepared by The Transport Planning Partnership (January 2025) in support of the State Significant Development Application. The TIA has rigorously tested the development's impact on surrounding road and transport networks using industry-standard SIDRA and Aimsun microsimulation modelling. This assessment considered cumulative growth in the network through to 2031, including future traffic from approved surrounding developments. Key findings of the TIA include: • The proposed development can be accommodated within the capacity of the surrounding road network, including Woodville Road, Parramatta Road, and the M4 connection points, when considered alongside committed road upgrades. • Intersection levels of service (LoS) remain within acceptable thresholds across peak travel periods, with manageable queue lengths and no material increase in unreleased vehicles • Upgrades to Crescent Street, including its intersection with Woodville Road, are part of the development and will help relieve localised congestion and improve traffic flow into and out of the site. In terms of public transport capacity: • The site is within proximity to existing bus services on Woodville Road and within a reasonable distance of rail services at Merrylands and Parramatta stations. • A private shuttle bus will operate between the development and Parramatta/Harris Park stations, reducing reliance on Woodville Road bus services and providing an attractive, frequent alternative to private vehicle use • A Green Travel Plan will be implemented to encourage sustainable transport choices, including walking, cycling and use of public transport. This will be supported by end-of-trip facilities and integrated pedestrian infrastructure within the site. • The development aligns with the Future Transport Strategy 2056 and supports increased residential density in areas with access to key arterial roads and existing public transport corridors. It also encourages mode shift away from car dependency over time.	N/A

Summary of Issue Raised	Response	Reference / Appendix
	In conclusion, the modelling and strategic transport response confirm that the development can be supported without adverse impact on the broader traffic or public transport network.	