

Report to the Secretary on an application for a Site Compatibility Certificate State Environmental Planning Policy (Affordable Rental Housing) 2009

THE SUBJECT SITE: 2a Gregory Place, Harris Park (Lot 2 DP 802801).

The site covers an area of 19,480m². It comprises a mix of industrial and office buildings ranging in heights from 2 to 8 storeys, many of which are vacant and deteriorating.

Figure 1 shows the location of the tallest building on site (8-storey industrial tower), and a formalised drainage channel / Clay Cliff Creek. The perimeter of the site comprises mature trees which act as a screen to an adjacent park and heritage items.

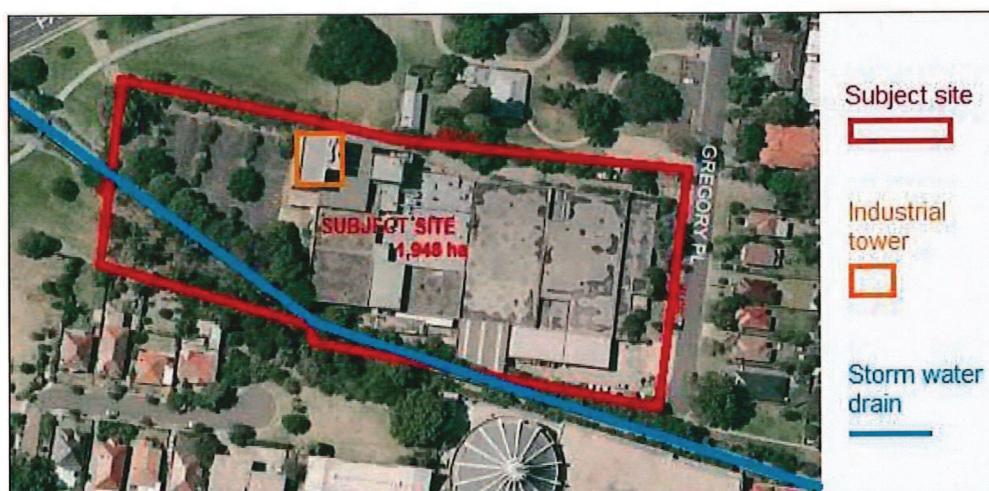


Figure 1: The subject site

The site is located approximately 300m from the eastern boundary of Parramatta Central Business District (CBD) and surrounded by park land, low-density housing, churches and heritage items ([Attachment A](#)).

The park land east of the site links with the Paramatta River in the north and forms a natural area between the CBD and the Harris Park residential precinct.

The land to the south comprises a mix of 4 to 8-storey residential flat buildings, Our Lady of Lebanon Maronite Church and a school. Land to the west and north generally comprises a mix of 1 to 2 storey single and dual occupancy development and 3 storey residential flat apartments.

The site is encircled by 3 heritage items listed on both the State Heritage Register and under the Parramatta LEP 2011 (Figure 2), being:

- Elizabeth Farm;
- Hambledon Cottage; and
- Experiment Farm Reserve.



Figure 2: Location

PROPONENT: The proponent is Pacific Planning on behalf of the land owner Hallmark Construction Pty Ltd.

PROPOSED OPERATOR: None.

LGA: City of Parramatta

PROPOSAL

The application seeks to provide a residential flat development that provides at least 50% of the new dwelling stock onsite as affordable housing for a minimum period of 10 years. The proposed development comprises:

- approximately 1300 dwellings;
- a predominant building form of 4–13 storeys; and
- 3 towers comprising 16, 23 and 35 storeys.

PERMISSIBILITY STATEMENT

The land is zoned IN1 General Residential Zone under the Parramatta Local Environmental Plan 2011 (PLEP 2011) (Figure 2). Residential accommodation is a prohibited use in the IN1 zone.

Development for the purposes of an apartment building may be permissible under Division 5 of the AHSEPP, if a site compatibility certificate (SCC) is issued. The provisions under Division 5 of the AHSEPP provide that a SCC can be issued for the site as outlined below.

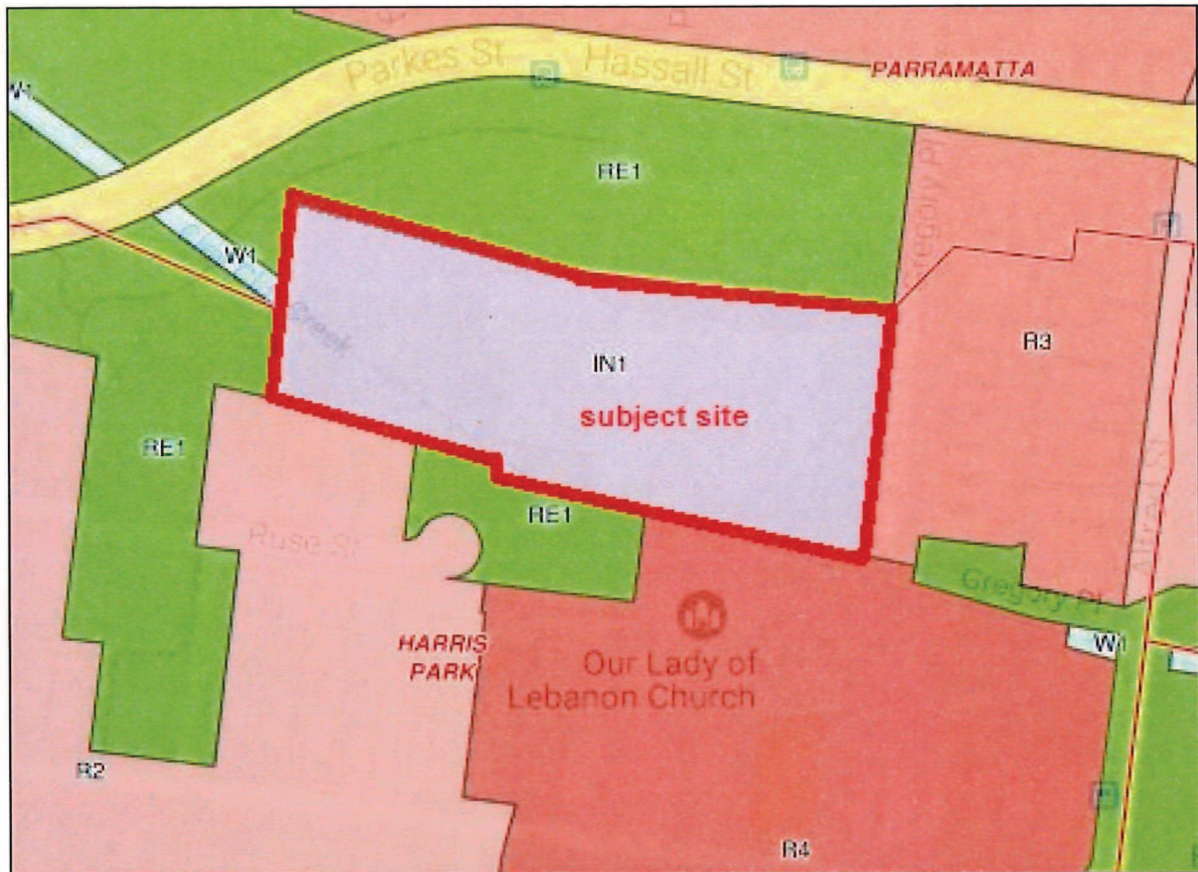


Figure 3: Land zone

Clause 34

The site meets requirement of Clause 34 as the land is zoned IN1 General Industrial, in which residential accommodation is a prohibited use. Therefore, a SCC is required to facilitate the submission and consideration of a Development Application.

The site meets requirement of Clause 34(a)(i) as it is within the Sydney Region, is centrally located and within 800m of 3 public entrances to the following railway stations (Attachment D):

- Parramatta;
- Harris Park; and
- Rosehill.

Clause 35

This clause requires development to be 'by or on behalf of a public authority or social housing provider, or by a person who is undertaking the development with the Land and Housing Corporation'.

The proponent has informed the Department that prior to lodgement of a DA a partnership will be in place with a social housing provider. The Sydney Region West team consulted the Department Legal Services Branch, and concluded that this proposed arrangement meets the SEPP requirements.

CLAUSE 37(6)

The Secretary must not issue a certificate unless the Secretary:

- (a) *has taken into account any comments received from the council within 14 days after the application for the certificate was made; and*

- (b) *is of the opinion that the development concerned is compatible with the surrounding land uses having regard to the matters set out in Clause 37(6)(b); and*
- (c) *is of the opinion that the development concerned is not likely to have an adverse effect on the environment and does not cause any unacceptable environmental risks to the land.*

COMMENTS FROM CITY OF PARRAMATTA COUNCIL

The Secretary must not issue a certificate unless the Secretary has taken into account any comments received from the council within 14 days after the application for the certificate was made.

Council's comments were received on 20 March 2017 ([Attachment E](#)) and 18 April 2017 ([Attachment F](#)) and raised concerns with the development. In summary, Council:

- agrees residential development is an appropriate future use of land;
- objects to the overall bulk and scale of proposed building heights and massing, which are excessive in relation to the surrounding area;
- opposes the visual dominance of the proposed development in regard to a sensitive heritage setting, open space and the boundary of the CBD;
- indicates that a development of this type is more suitable to a CBD location;
- indicates the proposed development does not comply with two of the most critical Design quality principles of *State Environmental Planning Policy 65 – Design Quality of Residential Apartment Development*, being;
 - Principle 1 – Context and Neighbourhood Character, as the design does not "respond and contribute to its context"; and
 - Principle 2 – Built form and scale as the proposed built form does not "achieve a scale, bulk and height appropriate to the existing or desired future character of the street and surrounding buildings".
- emphasises multiple site constraints including unacceptable impacts on heritage items, flood-affected land and access issues;
- recommends that if an approved SCC is granted, it be conditioned to require a detailed site and contextual analysis be conducted to ascertain the most appropriate typology, scale and arrangement of building forms on the site; and
- recommends the following preliminary design assessment principles:
 - low scale development on Gregory Place – 2-storey terraces, townhouses or manor homes with generous front setbacks matching the existing low density context;
 - medium density development on the remainder of the site – 3 to 4-storey apartment buildings in "a garden setting" that step down towards the northern interface with Hambledon Cottage;
 - increase public access through site connections linking Experiment Farm, Hambledon Cottage and Elizabeth Farm;
 - retention of existing mature vegetation providing enhancement of the visual setting of Hambledon Cottage; and
 - increased public open space – the south-western portion of the site that is not suitable for development due to its isolation, lack of street address and flooding constraints should form part of the Experiment Farm and Hambledon Cottage landscape setting.

The assessment below regarding the proposal's compatibility with surrounding land uses, heritage items and the effect on the environment demonstrates that the matters raised by Council should not preclude the issuing of an SCC.

The concerns raised by Council are considered to be matters that can be addressed as part of a detailed design consultation process with public authorities, both prior to and during the development assessment process.

COMPATIBILITY WITH SURROUNDING LAND USES

The Secretary must not issue a certificate unless the Secretary is of the opinion that the development concerned is compatible with the surrounding land uses having regard to the following matters (Clause 37(6)(b)):

(i) The existing uses and approved uses of land in the vicinity of the development

Planning Controls

Table 1 shows the land zones and maximum height of building controls under the PLEP 2011 for both the site and surrounding land.

	Land Zones	Maximum Height of Buildings	Floor Space Ratio
subject site	IN1 General Industrial zone	9.2 metres	None
surrounding land	RE1 Public Recreation	11 – 14 metres	None
	R2 Low Density Residential	6 metres	None
	R3 Medium Density Residential	11 metres	None
	R4 High Density	9.2 – 13 metres	0.8:1

Table 1: Surround land zones and maximum height of buildings controls

Surrounding Land Uses

The surrounding land uses are detailed in Table 2 below.

To the north	<ul style="list-style-type: none"> • Hambledon Cottage (Heritage Item) • Hassal Street (4 lane main road) • 1 and 2-storey low-density residential housing • St Loannis Greek Orthodox Church • The Parramatta River
To the east	<ul style="list-style-type: none"> • Gregory Place (a cul-de-sac) • 1 to 2-storey low-density residential housing • Elizabeth Farm (Heritage Item) • Local shops at Rosehill
To the south	<ul style="list-style-type: none"> • Storm water drain and clay cliff • Our Lady of Lebanon Maronite Church and school • 1 and 2-storey residential houses • 6 to 8-storey residential flats
To the west	<ul style="list-style-type: none"> • Experiment Farm (Heritage Item) • 1 and 2-storey residential houses • James Ruse Reserve (Park land) • Parramatta CBD

Table 2: Surrounding land uses

Surrounding Heritage Items

The subject site is surround by a number of heritage items listed on the State Heritage Register (Table 3), and identified in the Parramatta Local Environmental Plan 2011, Heritage Map – Sheet HER_010 (Figure 4).

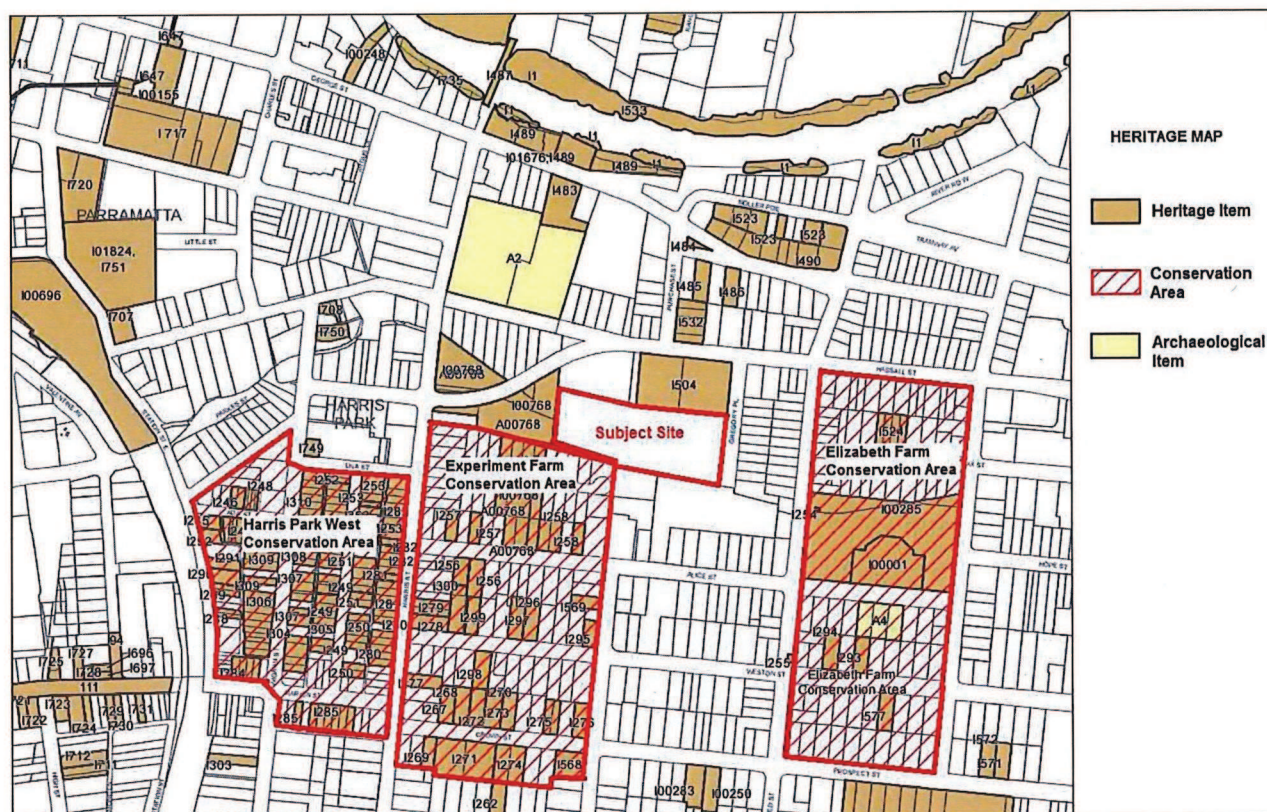


Figure 4: Heritage Map

State significance:	<ul style="list-style-type: none"> • Elizabeth Farm House (I00001) • Experiment Farm archaeological site (A00768) • Public reserve associated with Elizabeth Farm (I00285) • Experiment Farm Cottage and environs (I00768) • Hambledon Cottage, grounds and archaeology (01888)
Local significance:	<ul style="list-style-type: none"> • Hambledon Cottage and all trees (I504) • Timber cottages (I532) • Boundary Stone (I254)
Conservation areas:	<ul style="list-style-type: none"> • Elizabeth Farm Conservation Area • Experiment Farm Conservation Area • Harris Park West Conservation Area

Table 3: Heritage Items

Surrounding Park Land

The site is surrounded by park and reserves (Figure 5), specifically:

- Hambledon Cottage reserve to the north;
- Swann reserve to the east;
- Ruse Street reserve to the south; and
- Experiment Farm reserve to the west.

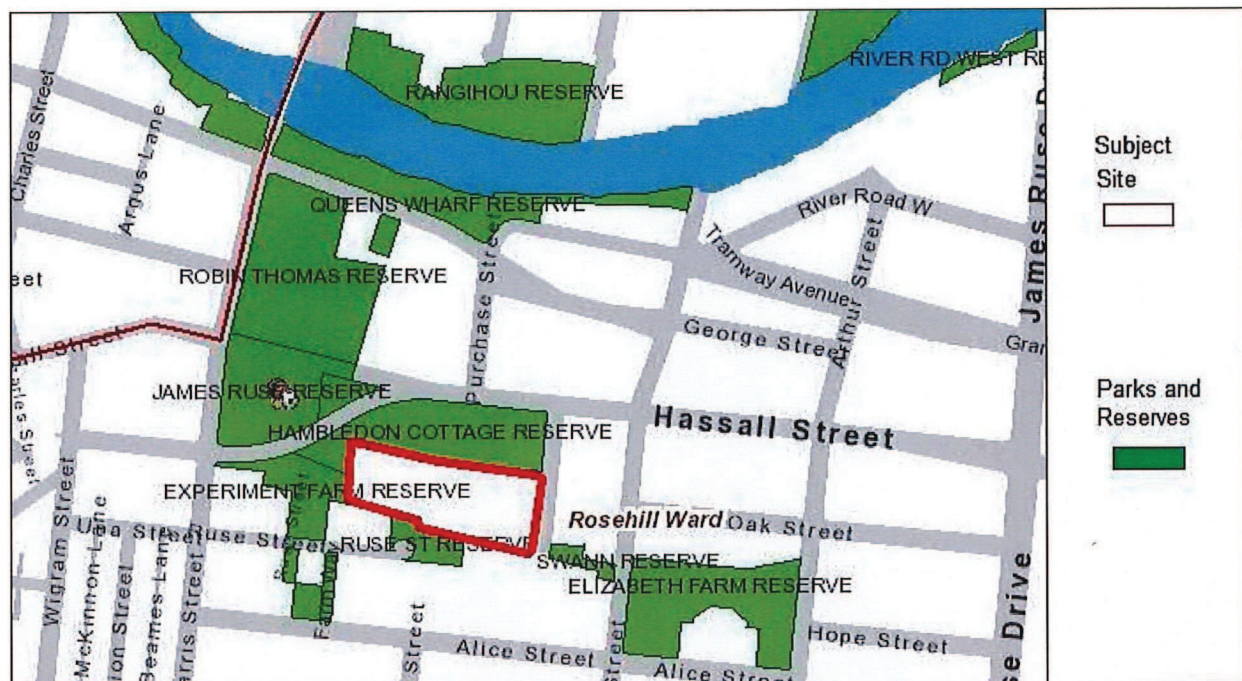


Figure 5: Surrounding Parks and Reserves

The site is connected by a green belt to the Parramatta River by James Ruse reserve, Robin Thomas reserve and Queens Wharf reserve, as seen above.

Proximity to the CBD

The Parramatta CBD Planning Strategy ([Attachment G](#)), adopted by Council in April 2015, has clearly defined boundary lines is supported by the following planning principles:

- P2 – Achieve a strategic balance of land uses.
- P3 – Create an attractive and distinctive city skyline, defined by tall, slender towers.
- P4 – Create a liveable, active and highly desirable city.
- P8 – Celebrate heritage and the natural environment.

The proponent claims the subject site should be considered within the CBD due to its proximity to the boundary line. The Parramatta CBD Planning Strategy has a clearly defined the existing CBD boundary, in Figure 6 below with a black line. The red dotted line shows proposed future expansion primarily to the north and south with no planned expansion of the CBD to the east.

Figure 7 shows the skyline of the CBD as viewed from the east and the boundary line marked in red along Harris Street. Below the red boundary line is a band of defined green space, and further below low-density residential housing. The green space connects the Parramatta river to the heritage curtilage of Hambleton Cottage, Experiment Farm and the subject site.



Figure 6: Parramatta CBD Boundary Map

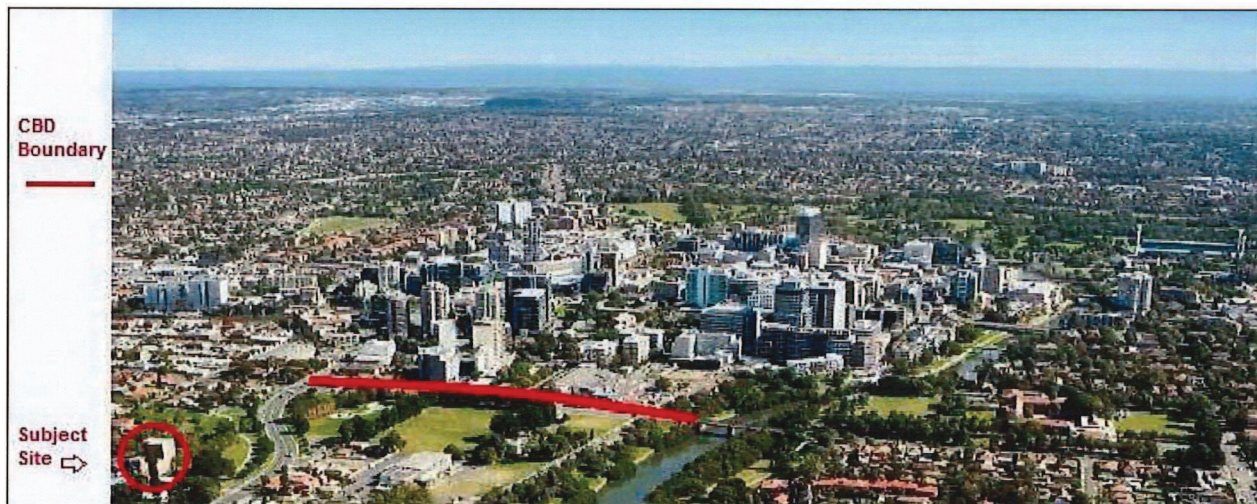


Figure 7: CBD Boundary

Therefore, it is not considered that the site is within the CBD and there are no plans for the CBD to expand to the East due to the protection of surrounding parklands and heritage items.

Local Planning Controls Agreed by the Department

The Department recently agreed to a Gateway alteration for a planning proposal in Parkes Street, which is within the existing CBD boundary and close to the site (Figure 8). Limited planning controls (FSR 8:1 and HOB 110m) were approved due to the proximity to Harris Park West Conservation Area and three items of heritage significance.

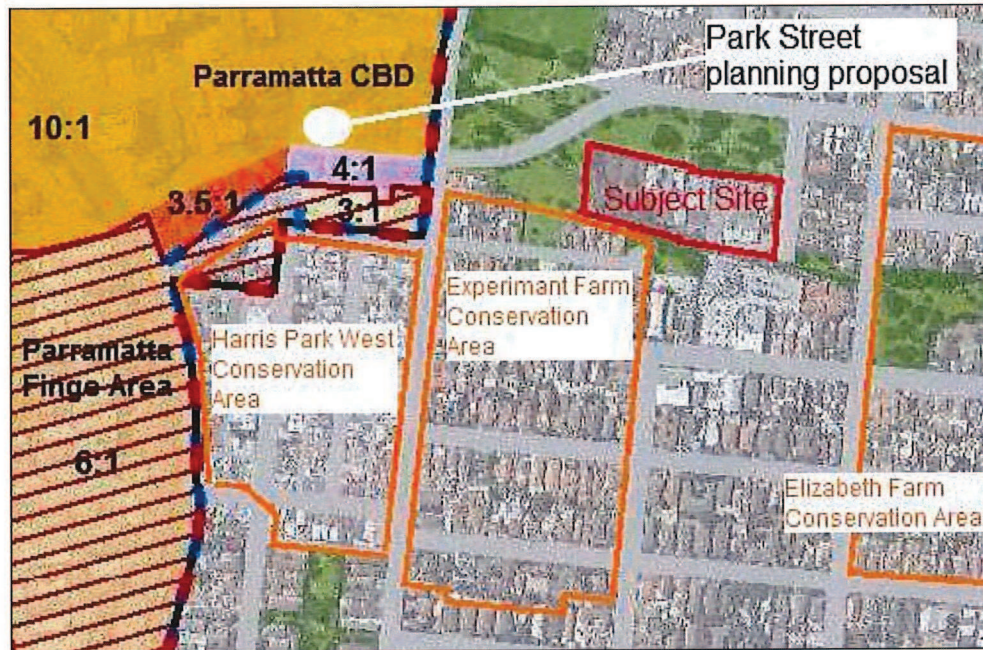


Figure 8: Parramatta Fringe

The CBD growth management strategy states that future development within the Parramatta fringe area is subject to further design refinement, and will step down in height and floor space ratio controls to ensure that an appropriate transition to the Harris Park West Conservation area is achieved. Ensuring that future development has minimal impact on scale, views and amenity in relation to heritage items, and the Harris Park Heritage Conservation Area.

Conclusion

The area surrounding the subject site is predominately residential dwellings, parklands, heritage items and conservation areas. Affordable housing is compatible with these surrounding uses of land.

The area is low in density, which provides a clear visual separation from the CBD and ensures minimal visual impact on parkland, heritage and conservation areas. As such, the final proposed design for the development will need to demonstrate compatibility with the surrounding character and land uses. This will be guided by the controls under the PLEP 2011, Parramatta CBD Planning Strategy and AHRSEPP and addressed through the development application process.

Further comments are provided below regarding the suitability of the proposed development, considering its bulk and scale, with the surrounding heritage items.

(ii) The impact that the development (including its bulk and scale) is likely to have on the existing uses, approved uses and uses that, in the opinion of the Secretary, are likely to be preferred future uses of that land

Reduction of Employment Land

The Parramatta Employment Land Strategy on page 24 (Attachment I), which was adopted by Council on 11th July 2016, recommends further investigation into rezoning the site for residential housing due to its location near amenities, service, heritage parkland and adjoining residential zones.

The strategy acknowledges that the office component of the site is the only land being used for commercial purposes, employing 11 people, and that the remainder of the site is underutilised. The Strategy also acknowledges that rezoning that land would have little impact on the supply of industrial land or jobs.

The Strategy states that to rezone the land from IN1 Industrial to a residential zone specific technical studies are necessary to take into the consideration the various constraints of the subject site, and ensure appropriate controls are put in place to best guide development for any future residential development. The technical studies recommended are:

- Economic Impact Study;
- Flood Study;
- Urban Design Study; and
- Heritage Study.

Draft West Central District Plan

The Draft West Central District Plan (the Plan) prioritises the protection and support for employment and urban services land in Productivity Priority 9, where relevant planning authorities should take a precautionary approach to rezoning employment land.

The Plan also discusses the need to increase affordable housing in Liveability Actions *L5: Independently assess need and viability*, and *L6: Support council to achieve additional affordable housing*, and *L6: Provide guidance on Affordable Rental Housing Targets*. These priorities improve the range of housing choices, supporting the Community Housing sector to provide affordable rental housing.

One of the overarching priorities of the Plan is to improve access to a greater number of jobs and centres within 30 minutes from homes. The Plan recognises that employment and service lands play a critical role in the efficient and effective function of the District, and a holistic precautionary approach to the planning of such lands is required.

Apartment Design

The application states that *State Environmental Planning Policy No 65—Design Quality of Residential Flat Development* (SEPP 65) will be considered during future assessment.

Clause 39 of the ARHSEPP confirms SEPP 65 will apply to any proposed residential flat development on the land. This means that solar access and overshadowing requirements, as well as the privacy, noise, streetscape and setback standards under the Department's Apartment Design Guide will help guide the development assessment process and final design outcomes on the site.

Heritage

The subject site is surrounded by 3 significant colonial heritage items linked to the establishment of Parramatta and John Macarthur (British army officer, entrepreneur, politician, architect) a pioneer of settlement in Australia and founder of Australia's wool industry. The sites are:

- Elizabeth Farm House;
- Experiment Farm; and
- Hambledon Cottage.

The site was included in original holdings for both Experiment Farm and Elizabeth Farm. More recently the site was purchased in 1945 by Kolynos Limited who proposed development of a pharmaceutical factory to Cumberland Council. This development was delayed due to Council's intention to develop connected open space along the Parramatta River to embrace historical items. After extensive negotiations the Mayor of Parramatta opened the factory in 1955. Hambledon Cottage was restored and the adjoining parkland reserve was formed. The Department notes that properties opposite Experiment Farm that existed in aerial photography in 1943 have been subsequently acquired and demolished, thereby linking Experiment Farm to the green space network.

The Heritage Assessment and Curtilage Study states the curtilage of Hambledon Cottage should be enhanced where possible to re-establish the colonial landscape, and be provided with an appropriate backdrop to screen the water course, clay cliff and all existing development on it. Although the subject site is predominately surrounded by low-scale residential development and park land, the most visually dominant buildings in the area behind Hambledon cottage are Our Lady of Lebanon Maronite Church and School (Figure 9) and the industrial tower on the subject site (Figure 10).



Figure 9: Left: Our Lady of Lebanon Maronite Church. Centre: Hambledon Cottage. Right: CBD



Figure 10: Left, Hambledon Cottage. Centre-right: industrial tower

The report highlights the need for a sympathetic redevelopment of the site that will enhance existing settings of the heritage items. Any redevelopment of the subject site should follow these principles:

- it should preclude the recovery of any physical or visual connection between the 3 heritage items, in particular Elizabeth Farm and Hambledon Cottage;

- any built form below the clay cliff, should not be within the view cone between Experiment Farm and Hambledon Cottage;
- it should provide enhancement of the visual setting of Hambledon Cottage when viewed from Hassel Street and the parklands; and
- it should step down towards the boundary with Hambledon Cottage.

- *Area of National Significance*

The Parramatta Development Control Plan 2011 ([Attachment H](#)) states in section 4 that the site is within an Area of National Significance where the scale, form, siting, materials and use of new development should not adversely affect the heritage significance of the surrounding area. The DCP encourages the re-establishment of Clay Cliff Creek as a natural watercourse and seeks that development does not impact upon or adversely affect the existing views into and out of the sites of Elizabeth Farm House, Experiment Farm Cottage and Hambledon Cottage.

Concerns by the Parramatta and District Historical Society

The Parramatta and District Historical Society lease Hambledon Cottage from Parramatta City Council. This includes venue management and restoration. During a Council Meeting held on 13 March 2017 ([Attachment P](#)) the President of the Parramatta and District Historical Society raised the following concerns, stating:

- the Parramatta and District Historical Society is not an anti-development organisation and understands the need for affordable housing within Parramatta;
- the height and bulk of the proposed development is excessive. There is an unacceptable level of impact particularly in context of the surrounding land uses and proximity to local and state heritage items.
- the proposal does not comply with the principles of SEPP 65 – Design Quality of Residential Apartment Development;
- view cones are not supported;
- the proposed development within 10m of the Cottage, puts at risk the very essence of history and heritage in Parramatta; although
- do believe the site is suitable to be redeveloped for residential purposes, provided it is of a nature that is compatible with the surrounding land uses.

Comments from NSW Office of Environment and Heritage

The Heritage Division provided comment on 29 May 2017 ([Attachment Q](#)), advising that they do not support the current proposal and raised the following key points:

- the Heritage Assessment and Curtilage Study by NBRSP+Partners is considered inadequate to support the application for a site compatibility certificate;
- the height, bulk and scale of the proposed development is:
 - unsympathetic to visual setting of Hambleton Cottage and its grounds; and
 - out of context with the predominately open space and low-scale development.
- the provision of view cones is supported to improve visual connections, also noting that association between the heritage items is maintained by the low-scale development in the area, which is considered sympathetic to surrounding heritage items and conservation areas;
- the current proposal will detract from National Trust conservation efforts; and
- Experiment Farm is of exceptional cultural significance and has received ongoing conservation since the 1920s, in part because of its visual prominence within the surrounding landscape. The proposed towers will dominate significant views from Experiment Farm Cottage and its grounds.

Applicant response regarding Heritage concerns

The proponent describes the interaction with the heritage precinct as the primary driving principle behind the proposed development. The application states that the design has been prepared to protect two heritage view cones), from the front door of Experiment Farm to Hambledon Cottage, and the Western Gate of Elizabeth Farm to Hambledon Cottage (Figure 11).

The proponent states that workshops were held with Council heritage officers, during which design principles were established to protect the heritage items. These include a stepdown backdrop towards the boundary of Hambledon Cottage to breakdown scale and mass. However, the Urban Design Report shows the tallest tower (35 storeys) adjacent to the single storey Hambledon Cottage (Figure 12).

Figure 12 also shows the existing visual landmark, The Lady of Lebanon Maronite Church and School, partially hidden by the tallest tower. The image shows the contrast of the proposed development on existing development.

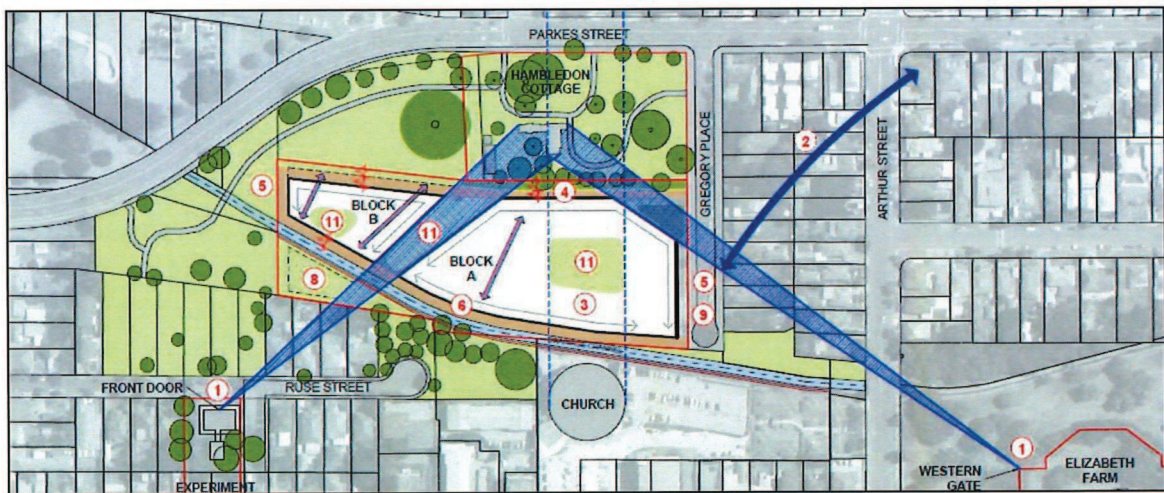


Figure 11: View Cones

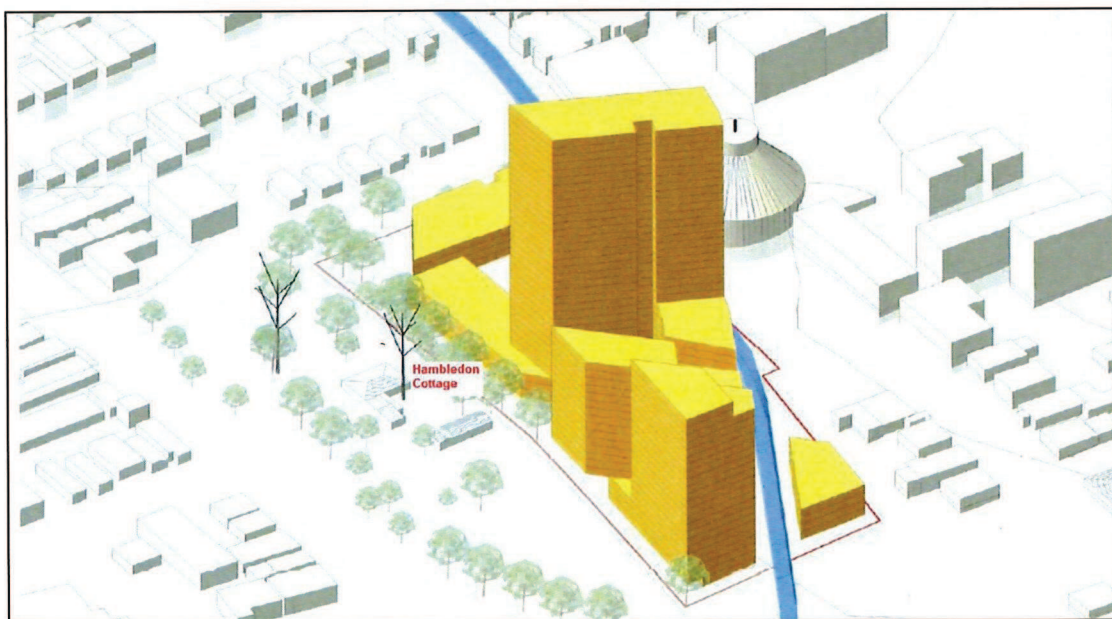


Figure 12: Hambledon Cottage in relation to the proposed development

Conclusion

Residential housing would be an appropriate future use for the subject site as the land is no longer required as Employment Land. Allowing residential uses on an isolated

parcel of industrial zoned land would not set a precedent for rezoning employment land in the area.

The bulk and scale of the proposed development in the Urban Design Report may be more suited to a CBD location and not reflective of the existing local low density character or preferred bulk and scale on the site to protect surrounding heritage significance, particularly considering the proposed height and bulk.

During the development application process, further investigation into the constraints of the site will determine the final bulk and scale of the development. This will include:

- consideration of the site being located within an Area of National Significance;
- development of heritage protection principles, through consultation with OEH, Heritage Council of NSW and Council;
- SEPP 65 and the Department's Apartment Design Guide; and
- the recommended proposed technical studies identified within the Parramatta Employment Land Strategy.

The bulk and scale of the final development will be guided and refined throughout the development application process and therefore the proposed bulk and scale should not preclude the issuing of a certificate for the site.

(iii) The services and infrastructure that are or will be available to meet the demands arising from the development (clause 37(6)(b)(iii))

Transport Services

The site has access to a number of public transport services. The site is within 800m of Parramatta railway station and bus terminal, as well as Harris Park and Rosehill railway station and bus stops on Hassall Street (Figure 13).

The proponent provided a Preliminary Traffic Assessment Study by Traffic Solutions Pty Ltd (Attachment J) including the assessment of potential impacts of a zone change of the subject site to a high-density residual development. The results conclude that:

- currently the intersection of Hassall Street and Gregory Place operated at a satisfactory level;
- capacity would be around 750 residential units on the subject site;
- capacity for 2500 units providing there was a 'No Right Turn' restricting traffic turning into Gregory Place;
- Roads and Maritime Services (RMS) indicate long-term increases in traffic from Hassall Street;
- RMS will not accept traffic signals at this location due to the close proximity to other existing traffic signals; and
- a roundabout is considered prohibitive to cost and land acquisition requirements.

Given that up to 1300 residential units are proposed onsite, it is likely that upgrade works will be required to the Hassall Street and Gregory Place intersection. The traffic report notes that this may be suitable, however an appropriate design response to ensure there is minimal impact on wider traffic movements will need to be demonstrated through the development application process.



Figure 13: Transport services in relation to the site

Retail, Commercial and Community Services

The subject site is located within walking distance of the Parramatta CBD, and local shops at Rosehill. Between them they host a range of services and facilities including the following:

- retail and commercial uses including a shopping centre, speciality shops, and food and drink premises;
- services such as banks, a post office, medical services, and government service offices;
- community facilities including a library, child care and public open space;
- schools and Western Sydney University; and
- places of public worship.

The application describes the subject site as being well serviced by community, health, educational and retail services available within the CBD and Rosehill. The proponent has suggested a Social Impact Assessment and Site Feasibility Analysis be undertaken prior to development approval. It is agreed that further investigation and consultation would be needed during the development assessment process.

Infrastructure Provision

As the subject site hosts an industrial factory and offices, it is presumed that the proposed development could adequately be serviced by utility infrastructure including sewer, water, power, gas and telecommunications. Although, the proponent has not provided evidence of this, so relevant agencies would need to confirm they can service the development during the development assessment process.

Conclusion

The site is considered to be well serviced by transport (public and private), local services including retail, commercial and community services, and infrastructure provision.

(C) EFFECT ON THE ENVIRONMENT

Flood Risk

The subject site is identified in Council's Floodplain Mitigation Strategy as flood prone (Attachment L). The majority of the site is within the 1 in 100-year flood level and susceptible to flooding by the Probable Maximum Flood limit. Modelling will be needed to demonstrate flood flows and storage within the subject site can be managed and that there will be no detrimental flow on effects for the surrounding area.

The proponent provided a letter to support the application which contains a Flooding Assessment by HKMA Engineers (Attachment M). The letter is prepared in response to Section 117 Directions in relation to flooding stating that a detailed analysis will occur consistent with Council's development controls at the development assessment process.

Soil Contamination

The site has two Acid Sulfate Soil classifications that are divided by the stormwater channel, with class 4 to the north and class 5 to the south.

A Contamination Assessment by Sullivan Environmental Sciences (Attachment N) has been undertaken concluding that historic activities may have caused potential contamination and that with remediation methods, from the preliminary investigation, the land would be suitable for residential use.

Conclusion

The risk of flooding and remediation of the site will be adequately managed through the development assessment process and therefore should not preclude the issuing of a certificate for the site.

CONCLUSION

It is acknowledged there are both concerns and merits associated with this SCC application.

Concerns

- the subject site is not within the Parramatta CBD, and the proposed bulk and scale of the development is better suited to a CBD location;
- the height and density of the proposed development is not adequately justified and not considered compatible with the existing surrounding area;
- the site is subject to constraints, including the protection and preservation of surrounding heritage items and conservation areas; and
- Council and OEH do not support the bulk and scale of the proposed development and the impact on the surrounding heritage items.

Merits

- the land is suitable for affordable rental housing that is sensitive to the existing surrounding area;

- the subject site is located close to infrastructure, public transport services, community and retail facilities, and Parramatta CBD;
- known site constraints can be addressed by;
 - further consultation with OEH, Heritage Council of NSW and the City of Parramatta Council, specifically in regard to the height, bulk and scale of any future development; and
 - mitigation methods through the development assessment process.
- a residential flat development with 50% being made available for affordable rental housing is considered to be a suitable development outcome for the subject site.

AHSEPP Criteria

- the proponent has assured that a partnership with a social housing provider will be in place prior to the lodgement of a development application;
- affordable housing is considered to be compatible with the surrounding uses of land but, to align with existing uses and approved uses of land in the vicinity of the development, the final design for the development will need to demonstrate compatibility with the surrounding character and land uses managed through the development assessment process;
- the proposed bulk and scale of the development, as seen within the Urban Design Report, raises concerns and would have a negative effect on the existing surrounding uses including residential, parklands and heritage items, and conservation areas that has not been adequately addressed;
- as affordable housing is the preferred future use of the site, more detailed investigation into the constraints of the site will determine the final bulk and scale of the development through the development assessment process;
- the services and infrastructure available are considered adequate to meet the demands arising from the development that is in-keeping with the surrounding area; and therefore
- a development that is in-keeping with the existing uses and approved uses of the neighbouring land is not considered to have an adverse effect on the environment or cause any unacceptable environmental risks to the land would be supported.

It is acknowledged that the bulk and scale of the proposed development in the Urban Design Report is not in-keeping or compatible with the surrounding area, does not provide a suitable transition and could have an adverse impact on the surrounding environment, heritage items and land uses. However, a development that is more in-keeping with the surround area is supported and issues relating to bulk and scale can be thoroughly reviewed and addressed through the development assessment process. Therefore, issues relating to the proposed bulk and scale of the development should not preclude the issuing of a certificate for this site.

The approval of a site compatibility certificate for land at 2a Gregory Place, Harris Park (Lot 2 DP 802801) is recommended to be issued subject to:

- the proposed partnership with a social housing provider being in place prior to the lodgement of a development application;
- further consultation between the proponent, OEH, Heritage Council of NSW, and the City of Parramatta Council, specifically to address the impacts of bulk and scale on surrounding area; and
- the assessment of the development application under section 79C of the *Environmental Planning and Assessment Act 1979*, where the consent authority must be satisfied the development is compatible with existing uses and approved uses of land in the vicinity of the development, with the resolution of:

- heritage issues;
- form, height, bulk, scale, setbacks, landscaping and residential amenity; and
- traffic and access, flood risk management and soil contamination.

Sargeant

Anthea Sargeant
Acting Executive Director, Regions

19/7/17

[Signature]

Stephen Murray
Acting Deputy Secretary
Planning Services

19 July 2017

Contact Officer: Catherine Van Laeren (SM)
Director Sydney Region West
Contact: (02) 9860 1520