

Submissions Report

Sydney Olympic Park Over and Adjacent Station Development

May 2024

sydneymetro.info



Acknowledgement of Country

Sydney Metro pays respect to Elders past and present, and recognises and celebrates the diversity of Aboriginal peoples and their ongoing cultures and connections to the lands and waters of NSW.



Sydney Olympic Park Over and Adjacent Station Development

Submissions Report

Acknowledgement of Country

Sydney Metro respectfully acknowledges the Traditional Custodians of the Sydney Metro West corridor, the Burramattagal, Wangal and Gadigal clan groups.

Westmead and Parramatta are situated on Burramattagal Country, which stretches from Rosehill to Prospect. Sydney Olympic Park to the Bays is situated on Wangal Country which stretches across the southern shore of Parramatta River between Burramattagal Country and Gadigal Country. Pyrmont and Sydney CBD is situated on Gadigal Country, which runs from the south side of Port Jackson, extending from South Head to Darling Harbour. We recognise the importance of these places to Aboriginal peoples and their continuing connection to Country and culture. We pay our respects to Elders past and present.

Many of the transport routes we use today – from rail lines, to roads, to water crossings – follow the traditional Songlines and trade routes and ceremonial paths in Country that our nation’s First peoples followed for tens of thousands of years.

Sydney Metro is committed to honouring Aboriginal peoples cultural and spiritual connections to the land, waters and seas and their rich contribution to society.

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Executive summary

Sydney Metro overview

Sydney is expanding and the NSW Government is working hard to deliver an integrated transport system that meets the needs of customers now and in the future.

Sydney Metro is Australia's biggest public transport program. Services on the North West Metro Line between Rouse Hill and Chatswood started in May 2019 on this new stand-alone metro railway system, which is revolutionising the way Greater Sydney travels.

The Sydney Metro West program of works includes:

- Sydney Metro North West – opened in May 2019
- Sydney Metro City & Southwest – currently under construction with services to begin in 2024
- Sydney Metro West – currently under construction and expected to open in 2032
- Sydney Metro – Western Sydney Airport – currently under construction and due to open when the airport opens for passenger services.

The Sydney Metro network is shown in Figure ES-1.

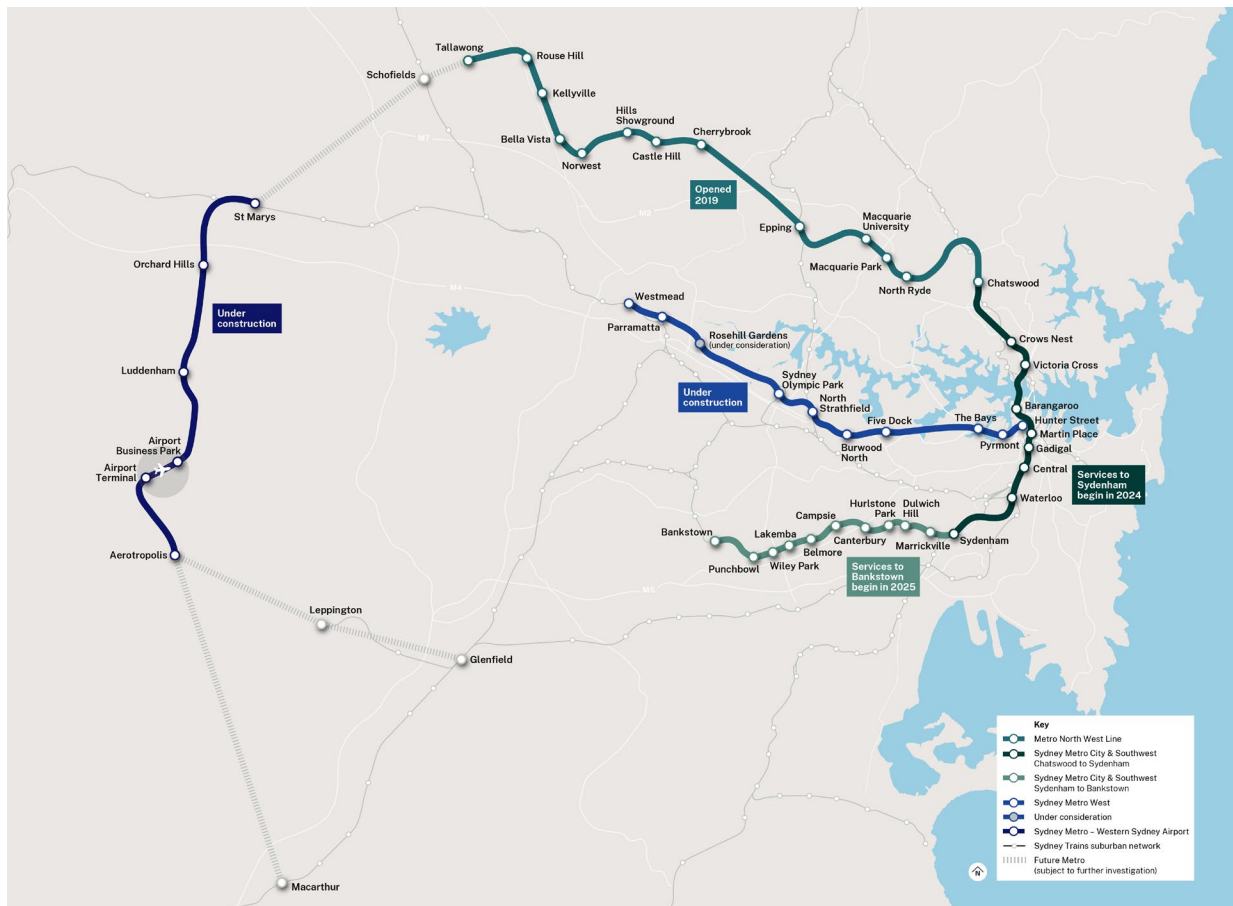


Figure ES-1 Sydney Metro network map

The delivery of Sydney Metro West is critical to keeping Sydney moving, and will:

- Comprise a new 24-kilometre metro line with stations confirmed at Westmead, Parramatta, Sydney Olympic Park, North Strathfield, Burwood North, Five Dock, The Bays, Pyrmont and Hunter Street in the Sydney CBD. Two potential station locations are being investigated west of Sydney Olympic Park, including one at Rosehill Gardens which could support a significant increase in housing

- Provide fast, reliable turn-up-and-go metro services with fully accessible stations
- Link new communities to rail services and support employment growth and housing supply
- Relieve the congested T1 Western Line, T9 Northern Line, and T2 Inner West & Leppington Line
- Double the rail capacity between Parramatta and the Sydney CBDs
- Significantly boost economic opportunities for Greater Parramatta
- Support new residential and employment zones along the Greater Parramatta to Sydney CBD corridor, including at Sydney Olympic Park and The Bays – providing improved transport for the additional 420,000 new residents and 300,000 new workers forecast to be located within the corridor over the next 20 years
- Allow customers fast and easy transfers with the T1 Western Line at Westmead, T9 Northern Line at North Strathfield, and the Sydney Trains suburban rail network and Sydney Metro in the Sydney CBD
- Allow for transfers with the future Parramatta Light Rail Stage 1 at Westmead and Parramatta, as well as the planned Parramatta Light Rail Stage 2 at Sydney Olympic Park
- Create an anticipated 10,000 direct and 70,000 indirect jobs during construction.



Figure ES-2 Sydney Metro West alignment map

Sydney Metro West has been approved as staged Critical State Significant Infrastructure (CSSI) under section 5.20 of the *Environmental Planning and Assessment Act 1979* (EP&A Act) and comprises the following:

- The application for the Concept and major civil construction work for Sydney Metro West between Westmead and The Bays, including station excavation and tunnelling, associated with the Sydney Metro West railway line (Concept and Stage 1 CSSI Approval) was approved on 11 March 2021.
- The application for all major civil construction and enabling works between The Bays and the Sydney CBD, including demolition, tunnelling, and station excavation for new metro stations associated with the Sydney Metro West railway line (Stage 2 CSSI Approval) was approved on 24 August 2022.

- The application for rail infrastructure, including fit-out of tunnels, construction, fit-out, and operation of metro stations and surrounding precincts and operation of the Sydney Metro West line (Stage 3 CSSI Approval) was approved on 25 January 2023.

Integrated station and precinct development

The Stage 1 and Stage 3 CSSI approvals for the Sydney Metro West project included provisions for future integrated station and precinct development that could provide a range of uses. Integrating a mix of uses and development into the station precinct would contribute to the success of places by:

- Encouraging precinct activation and use of Sydney Metro West across different times of the day and week
- Creating opportunities to provide facilities which meet customer and community needs, attracting people to stations
- Allowing stations to successfully integrate into their urban context and to contribute positively to the character of places at the stations.

Sydney Metro is making provision for over and/or adjacent station developments at selected stations. Sydney Metro will continue working closely with the local community and stakeholders so that station precincts become welcoming hubs that build on the local character.

An Environmental Impact Statement (EIS) was prepared to accompany a Concept State Significant Development Application (Concept SSDA) for over station development (OSD) and adjacent station development (ASD) at the Sydney Olympic Park site. The EIS was prepared by Sydney Metro (the applicant for SSD-35283699) and submitted to the NSW Department of Planning, Housing and Infrastructure (DPHI) pursuant to Part 4 of the EP&A Act.

The Concept SSDA seeks consent for a concept proposal, within the meaning of section 4.22 of the EP&A Act, for the proposed land uses, maximum building envelopes, maximum building heights, maximum gross floor area, and maximum car parking provision for the future OSD and ASD on the site.

The Building 1 envelope is a 21 storey (RL 122.00) primarily commercial building above the station podium, which has been approved under the Stage 3 CSSI Approval. The Building 2 envelope is a 27 storey (RL 118.00) mixed use building with retail and commercial uses in the 4 storey podium with residential accommodation above. The Building 3 envelope is a 45 storey (RL 171.00) mixed use building with retail and commercial uses in the 4 storey podium with residential accommodation above.

In line with NSW Government objectives, Sydney Metro is investigating further refinement of the Concept SSDA to determine if additional residential land use is feasible within the proposed scheme, subject to further assessment and approval.

Purpose of this report

DPHI issued a letter to Sydney Metro on 16 December 2022 requesting a response to the issues raised during the public exhibition of the application. This Submissions Report addresses the matters raised by government agencies, local Council and in public and community submissions during the public exhibition of the proposed development.

DPHI issued a Request for Additional Information on 6 February 2023 and the Submissions Report also provides a response to these matters. The following specific matters were identified by DPHI:

- Clarification of the project's response to advice provided by the Sydney Metro West Design Advisory Panel (SMWDAP)
- Further clarifications/refinements to the submitted site-specific Design Guidelines
- Further clarifications on the funding and timing on public domain works, infrastructure and development contributions
- Additional overshadowing impact analysis
- Additional clarifications relating to traffic and parking modelling
- Clarify or confirm the provision of affordable housing for the proposal

- Further consultation with Council and the Sydney Olympic Park Authority.

This Submissions Report outlines the proposed clarifications and refinements to the Concept SSDA proposal, responds to all issues raised within submissions and agency advice received, and provides a response to the Request for Additional Information issued by DPHI.

Overview of submissions

The Concept SSDA was on public exhibition between 16 November 2022 and 13 December 2022. A total of 17 submissions were received which included 7 submissions made by community and business organisations, 9 from the community, and one from City of Parramatta Council. Advice was also received from 12 key government agencies and authorities.

A submission received from City of Parramatta Council noted Council had no further comments to add other than those forwarded to DPHI during consultation of the Draft Sydney Olympic Park Master Plan 2030 (Interim Metro Review). The advice related to matters including the planned balance of uses at Sydney Olympic Park, overshadowing arising from revised controls, transport access and encouragement of use of non-car transport modes.

Advice from Sydney Olympic Park Authority (SOPA) was also received which sought detailed clarifications about components of the proposed development, including pedestrian access, the public domain, visual privacy, contamination and stormwater management.

Advice from Transport for NSW (TfNSW) noted support for the reduced car parking and proposed bicycle parking across the site. TfNSW provided suggested draft conditions of consent to be considered by the consent authority.

NSW Environment and Heritage (formerly Department of Planning and Environment – Environment and Heritage Group) requested further information about stormwater runoff at all stages to ensure there is no impact to the Green and Golden Bell Frog habitat at the Northern Water Feature. NSW Environment and Heritage also requested further information regarding the flooding modelling in the Probable Maximum Flood (PMF) event.

Advice from NSW Department of Climate Change, Energy, Environment and Water – Water Group (formerly Department of Planning and Environment – Water team) recommended matters for future consideration at the detailed design stage relating to water entitlements and groundwater management.

Sydney Trains, NSW Rural Fire Service, NSW Environmental Protection Authority (EPA), Fire and Rescue NSW, Heritage NSW and Heritage NSW (Aboriginal Cultural Heritage) all provided no additional comments or assessment requirements.

Sydney Water requested further consideration is given to rainwater capture and stormwater runoff reduction for the proposed development.

Advice from Sydney Metro stated only that Sydney Metro is the Applicant for the Concept SSDA and Sydney Metro has no comments to make on the application.

In addition, 16 public submissions were received from neighbouring properties, residents and businesses within the community. Five submissions were in objection to the proposal, seven submissions were in support of the proposal and the remaining submissions provided comments.

The key issues raised in the public submissions can be broadly grouped into the following categories:

- Overshadowing impacts to the southern neighbours
- Concern regarding the proposed building height and density
- Support for the increased housing above the new metro station, which will reduce reliance on private vehicles
- Concerns about a lack of affordable/social housing provision within the proposed development
- Concerns that the proposal does not provide enough retail floor space to create a viable town centre.

The Submissions Report provides a response to all public submissions and agency advice within Section 4.

Actions taken during and since exhibition

Since lodgement of the Concept SSDA, Sydney Metro has undertaken further consultation with key stakeholders. Sydney Metro undertook community information sessions, virtual community engagement, and provided additional resources and information to the community during the exhibition of the Concept SSDA.

Since the Concept SSDA was publicly exhibited, Sydney Metro has also undertaken further discussions with government agencies including DPHI, TfNSW and Sydney Olympic Park Authority to discuss the matters raised within their submissions. This is summarised below:

- Meeting with DPHI on 22 February 2023, with subsequent regular updates on an approximately monthly basis
- Presentation to TfNSW Working Group on 15 March and follow-up briefing provided
- Updates provided at monthly meetings with Sydney Olympic Park Authority, including a follow-up focused meeting on 14 June 2023 to discuss stormwater matters.

As part of this Submissions Report, Sydney Metro has prepared additional information in response to the submissions received during the exhibition of the Concept SSDA and in response to the Request for Additional Information from DPHI. This Submissions Report is accompanied by the following documents and additional information, as provided in the appendices:

- Submissions register
- Revised mitigation measures schedule
- Summary of Sydney Metro West Design Advisory Panel feedback
- Amended Site-Specific Design Guidelines
- Amended Chapter 4 State Environmental Planning Policy (Housing) 2021 Report
- Amended Built Form and Urban Design Report
- Amended Shadow Impact Assessment
- Updated Building Envelope Plans
- Updated Indicative Reference Scheme
- Updated Demarcation Plans
- Addendum to Transport and Access Assessment Report
- Addendum to Preliminary Integrated Water Management Plan Report
- Addendum to Utilities & Infrastructure Servicing Assessment Report
- Addendum to Flooding Assessment Report.

Project refinement and clarification

Sydney Metro has proposed a minor refinement and clarifications since public exhibition and in response to the submissions made, agency advice received, and the Sydney Metro West Design Advisory Panel (SMWDAP) advice. The description of the proposal has also been amended to reflect the refinement, as outlined in Section 3.3 of this Submissions Report.

The refinement and clarifications in the supporting plans and documents are summarised as follows:

- Refinement of the maximum gross floor area (GFA) (an increase of 960 m²) sought in the Concept SSDA as a result of on-going design development work on the metro station design under the Stage 3 CSSI Approval, and Indicative Reference Scheme for the OSD and ASD. This has led to efficiencies in internal areas (such as reduction in the station plant level within Building 1 and

relocation of the OSD entry lobby enabling more commercial floor area within the podium, refinement of service core areas on each level in Buildings 2 and 3 and enabling a minor increase in residential floor area). However, no change is sought to the proposed planning envelopes within the Concept SSDA, with any additional GFA to be contained within the maximum extent of these envelopes.

- Clarification of the Concept SSDA site boundary (to include a larger part of Precinct Street A and to exclude public domain areas which form part of the Stage 3 CSSI Approval), in response to advice from DPHI.
- Clarification of maximum building envelope heights as a result of an inconsistency noted between the lodged Building Envelope Plans and proposal description.
- Clarification of ground level RLs on the amended Building Envelope Plans, in response to advice from Sydney Olympic Park Authority.
- Clarification of the opportunity for increased activation of ground floor areas for non-station (OSD) uses within Building 1 which form part of the Concept SSDA. This is in response to advice from SMWDAP and Sydney Olympic Park Authority. The revised Ground Floor plan in the updated Indicative Reference Scheme (Appendix I) shows a revised station entry point on the Promenade and an additional small retail unit facing the Promenade. The OSD entry lobby within Building 1 is shown re-positioned adjacent to Figtree Drive and is therefore separated from the station entry points.
- Clarification of the podium northern setback of Building 2 relative to Building 1, in response to advice from Sydney Olympic Park Authority.
- Clarification of the minimum setback dimensions between envelopes for Building 1, 2 and 3 and separation from adjoining sites, in response to advice from Sydney Olympic Park Authority.
- Reducing the northward horizontal extension of the basement car park envelope below Building 2 and increasing the depth of this car park envelope from 6 basement levels to 7 basement levels. This reduces the impact of basement parking excavation on public domain areas above. The maximum car parking provision remains the same.

Revised mitigation measures are provided at Appendix B in response to the design refinement and clarifications and the DPHI Request for Additional Information.

The proposed refinement to the project which leads to a minor change to the maximum GFA sought in the Concept SSDA, and the clarification of maximum building envelope heights due to an inconsistency noted between the lodged Building Envelope Plans and proposal description require the following changes to the project description (changes shown in ~~strike through text~~ and **bold text**):

The Concept SSDA seeks development consent for building envelopes above and adjacent to the Sydney Olympic Park metro station, including:

- Maximum GFA of ~~67,370~~ **68,076** m² (in addition to the station Stage 3 CSSI GFA of approximately ~~630 884~~ m²) comprising, approximately:
 - ~~32,790~~ **33,150** m² of residential accommodation (approx. 316 dwellings)
 - ~~1,760~~ **1,389** m² of retail premises
 - ~~32,820~~ **33,537** m² of commercial premises

*Resulting in an indicative maximum overall GFA of ~~68,000~~ **68,960** m²*

- Maximum building envelopes, maximum heights, and land uses for:
 - *Building 1 – up to RL ~~449.00~~ **122.00** (approx. 21 storeys) for a commercial building (above a podium that incorporates the station services) and non-station uses (commercial and/or retail) within the podium and basement. (The Stage 3 CSSI approval includes the structural elements, utilities and services for the non-station uses within the Building 1 podium) (~~the podium is subject to a separate infrastructure approval SSI-22765520~~)*

- ~~Building 2 – up to RL 144.20~~ **118.00** (approx. 27 storeys) for retail and commercial uses in the 4 storey podium and residential tower above
- ~~Building 3 – up to RL 171.00~~ (approx. 45 storeys) for retail and commercial uses in the 4 storey podium and residential tower above
- Car parking for a maximum of 358 vehicles in a basement below Buildings 2 and 3
- Inclusion of Precinct Street A within the Concept SSDA site boundary
- Loading, vehicular, **bicycle** and pedestrian access arrangements.

The proposed refinement to the maximum GFA is an additional 960m² of GFA representing an increase of 1.4 percent to the total maximum GFA originally sought in the Concept SSDA. No change is sought to the exhibited building envelopes within the Concept SSDA, with any additional GFA to be contained within the maximum extent of these envelopes. The clarification of maximum building envelope heights is due to an inconsistency noted between the lodged Building Envelope Plans and proposal description.

Revised site-specific Design Guidelines will inform the detailed design of the development which respond to many of the issues raised in the advice from Sydney Olympic Park Authority and SMWDAP. As a result of the design refinement and clarifications listed above, and the Request for Additional Information from DPHI, revised supporting plans and supplemental assessment reports have been prepared. These are referred to in Section 4 and Section 5 and specified under 1.3 below.

Beyond those impacts previously assessed within the EIS, there will be no additional adverse impacts resulting from the refinement and clarifications to the proposal.

Conclusion

This Submissions Report has been prepared to satisfy the provisions of section 59 of the *Environmental Planning and Assessment Regulation 2021* (EP&A Regulation 2021). Each of the submissions and agency advice received during the public exhibition period have been collated, analysed, and addressed in this Submissions Report.

One refinement to the proposed development included within the Submissions Report is to revise the maximum GFA sought within the Concept SSDA. This is a result of on-going design development work on the metro station design under the Stage 3 CSSI Approval, and Indicative Reference Scheme for the OSD and ASD. This has led to efficiencies in internal areas, but no change is sought to the proposed planning envelopes within the Concept SSDA, with any additional GFA to be contained within the maximum extent of these envelopes.

- Following further assessment, no additional adverse environmental, social, or economic impacts have been identified as a result of the refinement and clarifications. Potential environmental impacts will be managed through the mitigation measures for the design, construction, and operational phases. As such, the proposed development is considered to be justified for the following reasons:
- The proposed Concept SSDA is consistent with the B4 Mixed Use zone objectives and will ensure Sydney Olympic Park becomes an active and vibrant town centre in an accessible location, maximising public transport patronage and encouraging walking and cycling.
- The proposed development is consistent with statutory planning controls and the strategic planning objectives for the site; and supports the Government's investment in public transport infrastructure and the delivery of well-connected place focused communities.
- The proposed development would support the growth of Sydney Olympic Park as a key planned employment and housing growth centre.
- The proposed development supports the '30-minute city' concept of the Central River City.
- The proposed development would create economic benefits and a vibrant precinct that is well connected to transport and provides opportunities for place-based design and transit-orientated development.
- The building envelopes reflect a sound and considered urban design and environmental outcome for the precinct accounting for the Apartment Design Guide (ADG) building separation requirements

(Department of Planning and Environment, 2015), surrounding context, solar access, and the principles of the SOP Master Plan 2030 (Interim Metro Review).

- The proposed building envelopes have been developed to enable flexibility for the future Detailed SSDA(s) to facilitate a high-quality development, led by the Sydney Metro West Design Excellence Strategy (DEX Strategy) processes.
- The site remains suitable for the proposed development.
- Overall, the proposed development is in the public interest. The proposal would contribute to the provision of a 30-minute Central City, co-locating housing and employment at a site which directly benefits from and will further enhance access to services, employment and transport.

1. Introduction

An Environmental Impact Statement (EIS) was prepared by Sydney Metro (the Applicant for SSD-35283699) in support of a Concept State Significant Development Application (SSDA) for the Sydney Olympic Park over station development (OSD) and adjacent station developments (ASDs).

The Concept SSDA (SSD-35283699) was lodged with the NSW Department of Planning, Housing and Infrastructure (DPHI) on 10 November 2022. The Concept SSDA was on public exhibition between 16 November 2022 and 13 December 2022. A total of 17 submissions were received which included 7 submissions made by community and business organisations, nine from the community and one from City of Parramatta Council. Twelve advice letters from government agencies and authorities were also received during the public exhibition.

DPHI issued a letter to Sydney Metro requesting a response to the issues raised in submissions and agency advice received.

This Submissions Report has been prepared in accordance with the *DPHI State Significant Development Guidelines – Preparing a Submissions Report* (Appendix C) March 2024 and provides the following:

- Responses to the matters raised in submissions received during the public exhibition period. Each of the submissions and agency advice received have been collated, analysed and the relevant issues have been addressed.
- Responses to the matters raised in the DPHI Request for Additional Information, dated 6 February 2023.
- A description of the refinement and clarifications made to the proposal since public exhibition.

1.1 Sydney Metro West

Sydney Metro West has been approved as a staged Critical State Significant Infrastructure (CSSI) application under section 5.20 of the *Environmental Planning and Assessment Act 1979* (EP&A Act) and comprises of the following:

- The application for the concept and major civil construction work for Sydney Metro West between Westmead and The Bays, including station excavation and tunnelling, associated with the Sydney Metro West railway line (Concept and Stage 1 CSSI Approval) was approved on 11 March 2021.
- The application for all major civil construction and enabling works between The Bays and the Sydney CBD, including demolition, tunnelling, and station excavation for new metro stations associated with the Sydney Metro West railway line (Stage 2 CSSI Approval) was approved on 24 August 2022.
- The application for rail infrastructure, including fit-out of tunnels, construction, fit-out, and operation of metro stations and surrounding precincts and operation of the Sydney Metro West line (Stage 3 CSSI Approval) was approved on 25 January 2023.

This Submissions Report includes references to matters which will be addressed as part of the Stage 3 CSSI Approval, rather than as part of the Concept SSDA or Detailed SSDA(s) for the OSD. As outlined above and at 1.2.1 below, the Stage 3 CSSI Approval includes the construction of the station infrastructure that includes physical provisions to enable the future OSD. Specifically, at Sydney Olympic Park, the northern metro station building, southern station building and podium built form up to the transfer slab level, and majority of public domain works are not part of the Concept SSDA or future Detailed SSDA(s) – these will be designed and constructed under the Stage 3 CSSI Approval.

1.2 Exhibited project

The Concept SSDA seeks consent for a mixed-use development within three building envelopes above and adjacent to the Sydney Olympic Park metro station. The exhibited EIS included the following figure (as Figure 3-2 of the EIS) which shows the building envelopes (coloured blue and pink) and their parameters, including their maximum RLs (Reduced Levels) and approximate number of storeys.

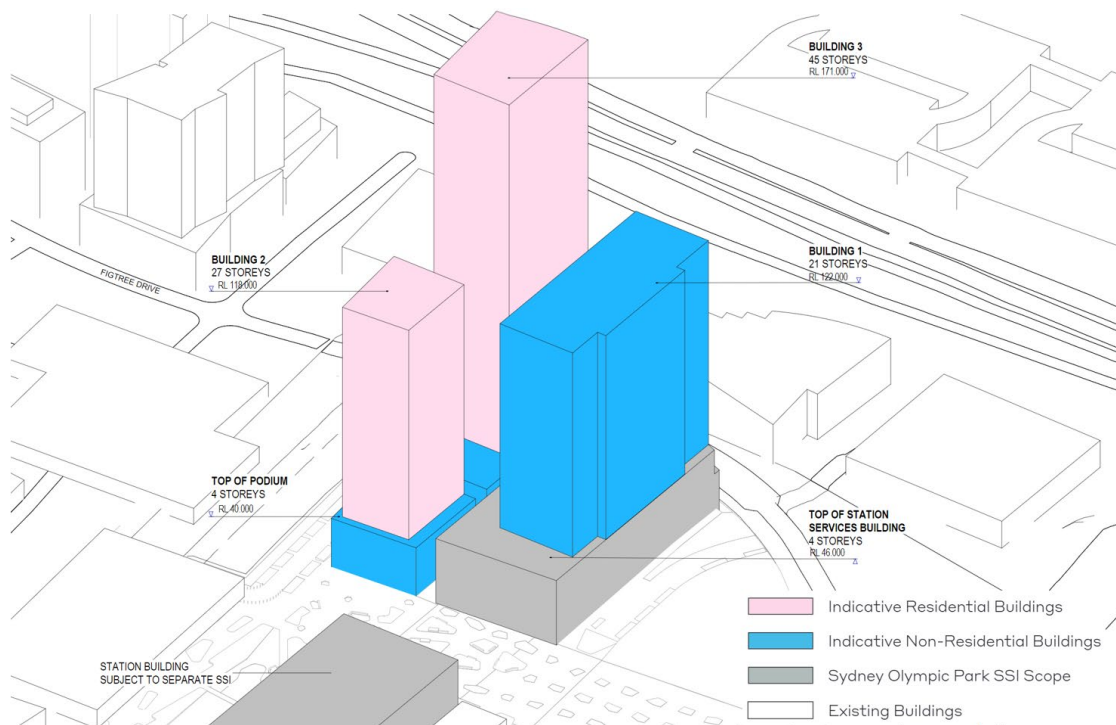


Figure 1-1 Concept SSDA scope and Sydney Olympic Park metro station infrastructure, as exhibited

It is noted that the Concept SSDA includes OSD areas inside the Building 1 CSSI 'shell' for non-station uses at podium and below ground levels, as further detailed in the updated indicative Demarcation Plans at Appendix J.

Further, the description stated:

The Concept SSDA seeks development consent for building envelopes above and adjacent to the Sydney Olympic Park metro station, including:

- Maximum GFA of 67,370 m² (in addition to the station Stage 3 CSSI GFA of approximately 630m²) comprising:
 - 32,790 m² of residential accommodation (approx. 316 dwellings)
 - 1,760 m² of retail premises
 - 32,820 m² of commercial premises

Resulting in an indicative maximum overall GFA of 68,000 m²

- Maximum building envelopes, maximum heights, and land uses for:
 - *Building 1 – up to RL 119.00 (approx. 21 storeys) for a commercial building above a podium that incorporates the station services (the podium is subject to a separate infrastructure approval SSI-22765520)*
 - *Building 2 – up to RL 114.20 (approx. 27 storeys) for retail and commercial uses in the 4 storey podium and residential tower above*
 - *Building 3 – up to RL 171.00 (approx. 45 storeys) for retail and commercial uses in the 4 storey podium and residential tower above*
- Car parking for a maximum of 358 vehicles in a basement below Buildings 2 and 3
- Loading, vehicular and pedestrian access arrangements.

1.2.1 Interface levels

The Concept SSDA EIS states that the Building 1 podium will be delivered under the Stage 3 CSSI Approval. The Stage 3 CSSI Approval includes the structural elements, utilities and services for the non-station uses (e.g. commercial and/or retail) within the Building 1 podium, and space for future lobbies, lift cores, access, loading docks and building services to enable the construction and operation of future OSD.

The EIS further states that approval for the non-station uses within the Building 1 podium and basement is sought under the Concept SSDA, together with the OSD building envelope above. The design of the non-station uses and interface between the station and the OSD (as indicated in Appendix I Demarcation Plans and Appendix H Indicative Reference Scheme of the EIS) is conceptual in nature and would be resolved through further design refinement. The Building 1 podium includes retail and commercial floor space, bicycle parking and plant and services space. This fit-out and use of these non-station spaces in the Building 1 podium is subject to approval under the future Detailed SSDA(s).

1.3 Supporting documentation

The structure and content of this Submissions Report is as follows:

- Chapter 1 – Introduction (this chapter)
- Chapter 2 – Analysis of submissions
- Chapter 3 – Actions taken during and since exhibition
- Chapter 4 – Response to submissions
- Chapter 5 – Additional assessment and clarifications
- Chapter 6 – Updated proposal justification

This Submissions Report is supported by the following technical reports and documentation as shown in Table 1-1 below.

Table 1-1 Supporting documentation

Appendix	Report
Appendix A	Submissions register
Appendix B	Revised mitigation measures schedule
Appendix C	Summary schedule of SMWDAP advice and project responses
Appendix D	Amended Site-Specific Design Guidelines
Appendix E	Amended Chapter 4 Housing SEPP Report
Appendix F	Amended Built Form and Urban Design Report
Appendix G	Amended Shadow Impact Analysis
Appendix H	Updated Building Envelope Plans
Appendix I	Updated Indicative Reference Scheme
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Appendix N	Addendum to Flooding Assessment report

2 Analysis of submissions

This section provides a summary of the submissions received including a breakdown of respondent type, nature/position and number of submissions received.

2.1 Breakdown of submissions

A total of 17 submissions were received which included seven submissions made by community and business organisations, nine from the community, and one from City of Parramatta Council. Submissions were made in support and objection, as set out in the following sections.

Advice was also received from 12 key government agencies and authorities. A response to each of the matters in agency advice has been prepared. An overview of the submissions and agency advice and a summary of the process undertaken to ensure these have been accurately responded to is provided below.

DPHI issued a letter to Sydney Metro requesting a response to the issues raised in submissions received during the exhibition period.

2.1.1 Government agency advice

The following government agencies and authorities provided advice during the public exhibition period:

- Department of Planning, Housing and Infrastructure
- NSW Environment and Heritage (formerly Department of Planning and Environment – Environment and Heritage Group)
- NSW Department of Climate Change, Energy, Environment and Water – Water Group (formerly Department of Planning and Environment – Water team)
- Sydney Olympic Park Authority
- Transport for NSW
- Heritage NSW (Aboriginal Cultural Heritage)
- Heritage NSW
- Fire and Rescue NSW
- NSW Environment Protection Authority
- Sydney Metro
- NSW Rural Fire Service
- Sydney Trains
- Sydney Water.

No government agency or authority has objected to the proposed development. Details of the matters raised in agency submissions, along with Sydney Metro's response, are set out in Section 4.

2.1.2 Council submission

The City of Parramatta Council made a submission commenting on the proposed development. Details of the issues raised in Council's submission, along with Sydney Metro's response, are set out in Section 4 of this report.

2.1.3 Community and Organisation submissions

Seven submissions were received from community and organisations, comprising of the following:

- Dunnet Properties

- Fitzpatrick Investments
- Sydney Olympic Park Business Association
- Western Sydney Leadership Dialogue
- Figtree OH Pty Ltd
- Urban Taskforce
- Scouts NSW.

Details of the matters raised in organisation submissions, along with Sydney Metro’s response, are set out in Section 4.2. Of the seven submissions, three were objections, three were in support, and one provided comment. Details of the matters raised in public submissions, along with Sydney Metro’s response, are set out in Section 4.

2.1.4 Community submissions

Nine submissions were received from members of the general community. Of the public submissions, two were objections, four were in support, and three provided comments. Details of the matters raised in public submissions, along with Sydney Metro’s response, are also set out in Section 4.

2.2 Categorising key issues

In accordance with DPHI *State Significant Development Guidelines*, the issues raised in the submissions are summarised in Table 2-1. A response to submissions is provided in Section 4 of this report.

Table 2-1 Categorising key issues

Category of issue	Summary of issues raised	Issue raised
Traffic and parking	<p>Some submissions welcomed the Sydney Metro project as a means to decrease the amount of traffic in the area by providing more public transport.</p> <p>Sydney Olympic Park Authority raised an issue of the access arrangement to new end of trip facilities and bicycle parking.</p> <p>TfNSW proposed draft conditions of consent relating to the preparation of a Green Travel Plan and Construction Pedestrian and Traffic Management Plan.</p>	<p>1 public submission</p> <p>3 agency advice</p>
Building height	<p>One public submission objected to the building heights as they are above the existing building heights in the area noting that no other building height exceeds 40 floors. The tallest building envelope proposed is 45 storeys.</p> <p>Other submissions noted that the proposed envelope heights should be increased to provide more housing.</p>	<p>3 public submissions</p> <p>1 community and organisation submission</p>
Stormwater and flooding	<p>NSW Environment and Heritage raised concern regarding flooding during a PMF event. They recommended the main driveway entry be via Figtree Drive to the west of this flooding to maintain access during all flood events.</p> <p>Sydney Water made recommendations relating to rainwater capture and stormwater runoff reduction.</p>	<p>3 agency advice</p>

	Sydney Olympic Park Authority raised queries regarding the stormwater strategy and with the data provided with the MUSIC calculations.	
Overshadowing	Neighbouring sites raised concerns of overshadowing to their site. DPHI requested further overshadowing impact analysis to adjoining and surrounding properties.	3 public submissions 2 community and organisation submissions
Visual privacy	Sydney Olympic Park Authority highlighted potential visual privacy issues arising from envelope separation distances between the proposed building and the adjacent sites (sites 46 and 48).	1 agency advice
Access and movement	Two public submissions commented on the broader access and movement improvements of Sydney Metro and identified opportunities to access improvements to Sydney Olympic Park. One community and organisation submission highlighted that the concept drawings (associated with Stage 3 CSSI Approval, rather than the Concept SSDA) have not taken into account vehicle access and servicing requirements for the undeveloped area of site 4B. TfNSW sought further clarification on the intended status of shared public roads around the proposal.	2 public submissions 2 community and organisation submissions 1 agency advice
Activation and pedestrian connections	Sydney Olympic Park Authority commented on a lack of activation and pedestrian connection on the ground plane shown in the Indicative Reference Scheme.	1 agency advice
Contamination and groundwater	Sydney Olympic Park Authority identified further clarification required in relation to the Contamination Report. NSW Water Group recommended matters for post-approval assessment relating to groundwater.	1 agency advice

3 Actions taken since exhibition

This section summarises the stakeholder and community engagement that has been undertaken during and following the exhibition period, as well as the refinement and clarifications that have been made to the project since its public exhibition. It also outlines the additional assessment undertaken to respond to the DPHI requested additional information, agency advice and issues raised in submissions outlined in Section 2.

3.1 Stakeholder and community engagement

Since the lodgement of the Concept SSDA, the following engagement with the community and stakeholders has been undertaken.

3.1.1 Public exhibition of the EIS

The EIS and accompanying technical reports and plans were placed on public exhibition by DPHI from 16 November 2022 to 13 December 2022. This provided stakeholders and the community an opportunity to review the information, have their questions answered by Sydney Metro and, if they chose, prepare and make a submission to DPHI.

The EIS was made publicly available on the DPHI's Major Projects website and on Sydney Metro's online interactive portal (www.sydneymetro.info/metrowest).

3.1.2 Consultation activities

The following consultation activities were carried out by Sydney Metro to support public exhibition of the EIS:

- Letterbox notifications (approximately 3,500 leaflets were posted before the information sessions)
- Newspaper advertisements
- Emails to those who had signed up for news/alerts
- Sydney Metro website updates
- Sydney Metro Connect App
- Place manager outreach including phone calls, emails and door knocking
- Social media posts.

3.1.3 Community information sessions

Sydney Metro hosted two community information sessions where displays and information about the EIS were available. These sessions were held on Monday 28 November from 11am – 2pm and 4pm – 7pm at the Novotel, Olympic Boulevard, Sydney Olympic Park.

Members of the community were invited to attend these sessions, to meet expert members of the Sydney Metro West team and have any questions answered. Visitors were not required to make a booking and were able to drop in anytime within the advertised periods. There were a total of 19 visitors at the two community information sessions.

Copies of the EIS and summary booklet (described below), and information boards were available for visitors to view at all of the information sessions. Project newsletters, contact cards and fridge magnets (with website links, contact email and phone numbers) were also available for visitors to take away.

Several information boards were presented around the room, such as an overview of Sydney Metro West and an overview of the Sydney Olympic Park OSD and ASD. The display also featured looped videos about this proposal, including videos featuring project experts explaining the more complex aspects of Sydney Metro West, such as the planning process and placemaking.

3.1.4 Virtual community engagement

Sydney Metro launched an interactive portal to provide an informative and accessible way for the community to view and access this EIS and all other relevant project information.

Community members were able to explore interactive maps and learn what to expect from the project. The portal displays information from the EIS, as well as outlines of the proposed building envelopes at the station. There were 8,311 visits to the interactive portal during the exhibition period. An image of the interactive portal is provided in the figure below.

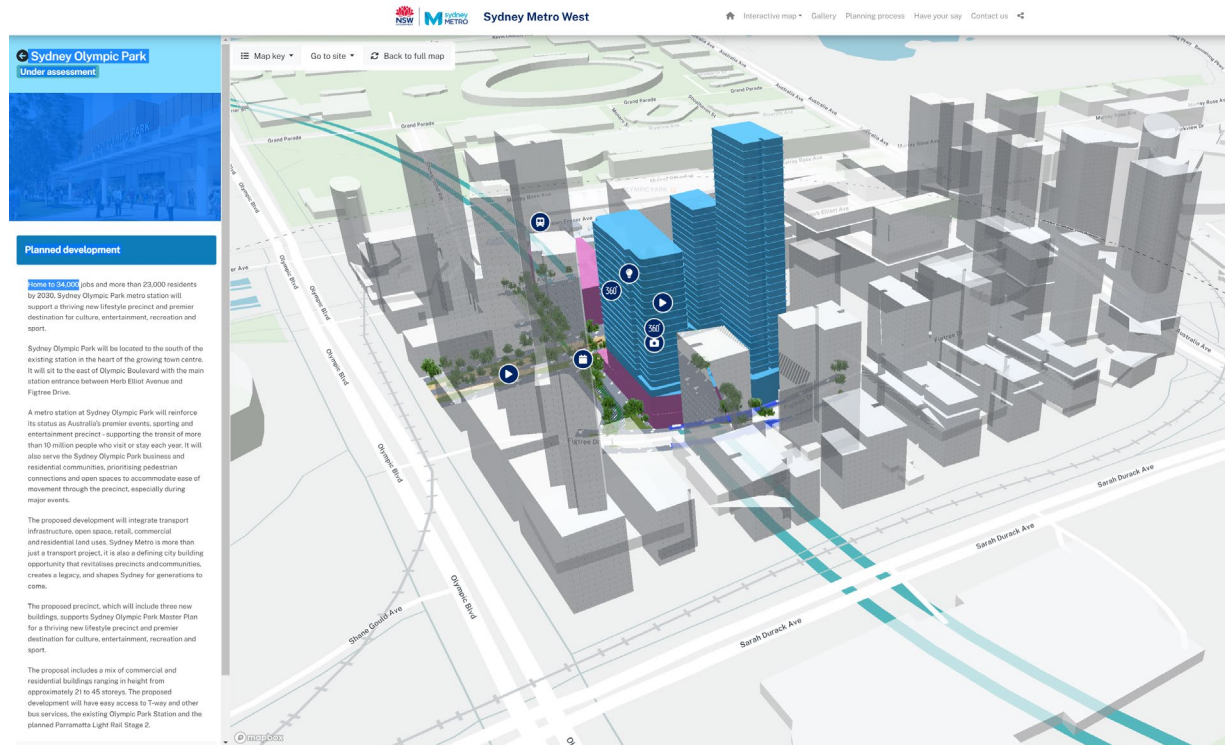


Figure 3-1 Interactive portal excerpt

3.1.5 EIS Overview document

A summary of the EIS was prepared to support the community information sessions. It is available at [Sydney Olympic Park Over and adjacent station development proposal \(caapp.com.au\)](http://Sydney Olympic Park Over and adjacent station development proposal (caapp.com.au)) The EIS overview document included:

- Information on Sydney Metro West, Sydney Olympic Park Metro Station and the Concept SSDA
- A summary of the EIS assessment
- An overview of the planning process.

The full version of the EIS was made publicly available on DPHI's Major Projects website and on Sydney Metro's online interactive portal (www.sydneymetro.info/metrowest).

3.1.6 Government agencies

Further consultation has been undertaken with government agencies following lodgement of the Concept SSDA. This has included:

- Meeting with DPHI on 22 February 2023, with further updates provided through the regular meetings between Sydney Metro and DPHI, plus briefings on 20 June 2023 and 24 October 2023 to present a summary of the responses to submissions and the DPHI Request for Additional Information.

- Monthly meetings with Sydney Olympic Park Authority, a specific meeting on 14 June 2023 in relation to stormwater matters, plus sharing of the draft schedule of responses to Sydney Olympic Park Authority submissions and draft revised site-specific Design Guidelines prior to lodgement.
- A presentation to TfNSW Working Group on 15 March 2023 to outline preliminary responses to TfNSW advice (letter dated 20 December 2022) and a follow-up briefing provided to TfNSW.

3.2 Additional assessment

Since the exhibition of the Concept SSDA, receipt of submissions and Request for Additional Information letter from DPHI, Sydney Metro has undertaken further assessment of the impacts of the project. The additional assessment is outlined in detail in Section 5.

3.3 Refinement and clarifications to the project

A number of clarifications are proposed in response to the agency advice and submissions received. One refinement to the proposed development is provided within the Submissions Report to increase the maximum GFA sought within the Concept SSDA.

These clarifications and refinement do not fundamentally alter the proposal and comprise of minor amendments which fit with the limits set by the exhibited Building Envelope Plans provided in Appendix G of the EIS. They are summarised as follows:

- Refinement of the maximum gross floor area (GFA) sought in the Concept SSDA as a result of on-going design development work on the metro station design under the Stage 3 CSSI Approval, and Indicative Reference Scheme for the OSD and ASD. This has led to efficiencies in internal areas, but no change is sought to the proposed planning envelopes within the Concept SSDA, with any additional GFA to be contained within the maximum extent of these envelopes.
- Clarification of the Concept SSDA site boundary (to include a larger part of Precinct Street A and also to exclude public domain areas which form part of the Stage 3 CSSI Approval), in response to advice received from DPHI.
- Clarification of maximum building envelope heights as a result of an inconsistency noted between the lodged Building Envelope Plans and description of the proposal.
- Clarification of ground level RLs on the amended Building Envelope Plans, in response to advice from Sydney Olympic Park Authority.
- Clarification of the opportunity for increased activation of ground floor areas for non-station (OSD) uses within Building 1 which form part of the Concept SSDA. This is in response to advice from SMWDAP and Sydney Olympic Park Authority. The revised Ground Floor plan in the updated Indicative Reference Scheme at Appendix I shows a revised station entry point on the Promenade, plus an additional small retail unit facing the Promenade. The OSD entry lobby within Building 1 is shown re-positioned adjacent to Figtree Drive – and therefore is separate from the station entry points.
- Clarification of the podium northern setback of Building 2 relative to Building 1, in response to advice from Sydney Olympic Park Authority.
- Clarification of the minimum setback dimensions between envelopes for Building 1, 2 and 3 and separation from adjoining sites (to comply with Apartment Design Guide (ADG) part 2F for buildings of 9 storeys or more (i.e. 24m between habitable rooms / balconies; 18m between habitable and non-habitable rooms; 12m between non-habitable rooms), in response to advice from Sydney Olympic Park Authority.
- Reducing the northward horizontal extension of the basement car park envelope below Building 2 and increasing the depth of this car park envelope from 6 basement levels (22 metres depth) to 7 basement levels (26 metres depth). Maximum car parking provision (358 vehicles) remains the same.

Revised mitigation measures are provided at Appendix B in response to these refinements and clarifications and the DPHI Request for Additional Information.

3.3.1 Refinement to the description of the proposal

The description of the Concept SSDA has been updated to align with the refinements and clarifications, and for consistency with the exhibited Building Envelope Plans as included in Appendix G of the EIS and updated Indicative Reference Scheme (Appendix I) and updated indicative Demarcation plans (Appendix J). The text deleted is shown as ~~strike through~~ and new text is **in bold**:

The Concept SSDA seeks development consent for building envelopes above and adjacent to the Sydney Olympic Park metro station, including:

- Maximum GFA of ~~67,370~~ **68,076 m²** (in addition to the station Stage 3 CSSI GFA of approximately ~~630 884 m²~~) comprising, approximately:
 - ~~32,790~~ **33,150 m²** of residential accommodation (316 dwellings)
 - ~~4,760~~ **1,389 m²** of retail premises
 - ~~32,820~~ **33,537 m²** of commercial premises

*Resulting in an indicative maximum overall GFA of ~~68,000 m²~~ **68,960 m²***

- Maximum building envelopes, maximum heights, and land uses for:
 - *Building 1 – up to RL ~~149.00~~ **122.00** (approx. 21 storeys) for a commercial building (above a podium that incorporates the station services) **and non-station uses (commercial and/or retail) within the podium and basement. (The Stage 3 CSSI approval SSI-22765520 includes the structural elements, utilities and services for the non-station uses within the Building 1 podium) (the podium is subject to a separate infrastructure approval SSI-22765520)***
 - *Building 2 – up to RL ~~144.20~~ **118.00** (approx. 27 storeys) for retail and commercial uses in the 4 storey podium and residential tower above*
 - *Building 3 – up to RL 171.00 (approx. 45 storeys) for retail and commercial uses in the 4 storey podium and residential tower above*
- Car parking for a maximum of 358 vehicles in a basement below Buildings 2 and 3
- Inclusion of Precinct Street A within the Concept SSDA site boundary
- Loading, vehicular, **bicycle** and pedestrian access arrangements.

The updated Concept SSDA building envelopes are shown in Figure 3-2 below – also included in the updated Building Envelope Plans at Appendix H.

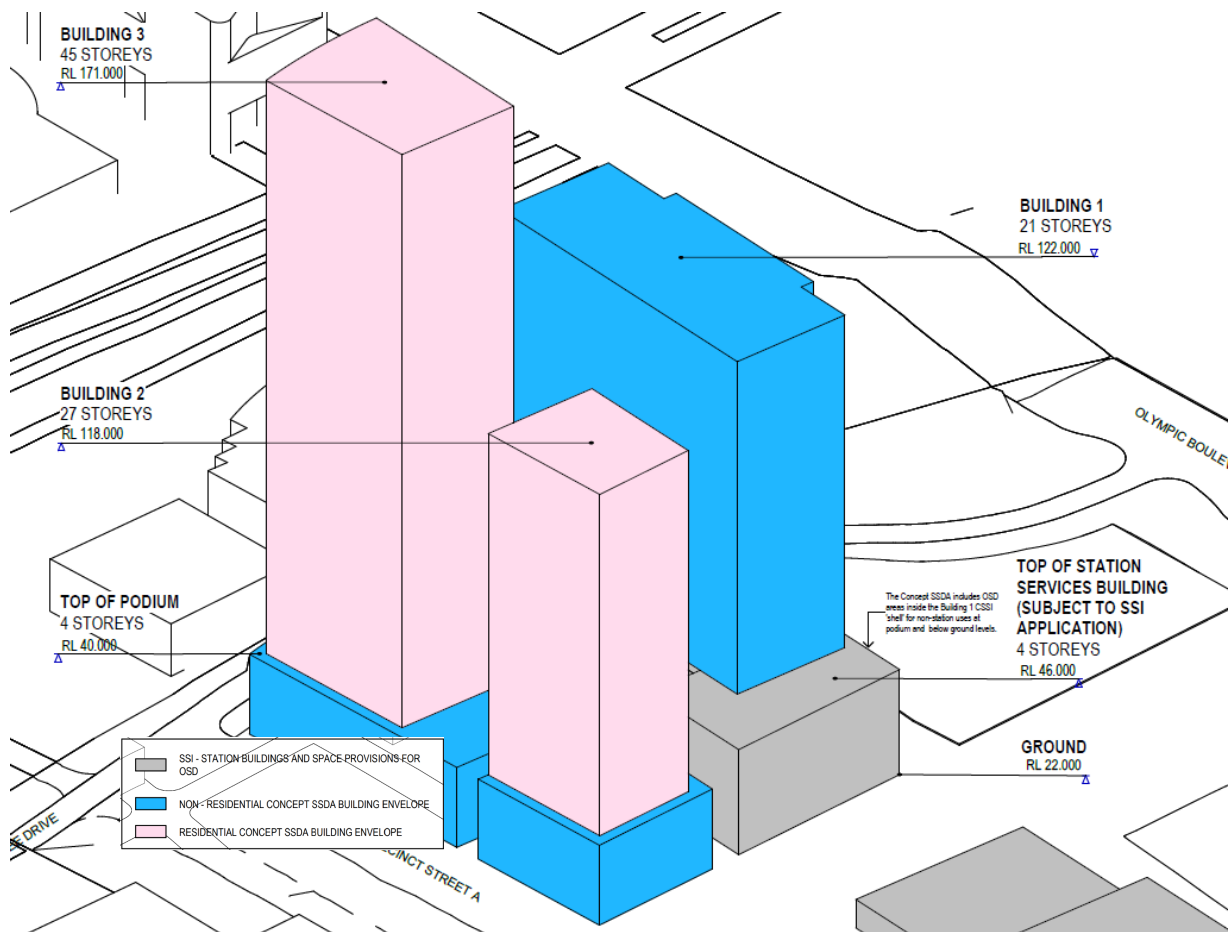


Figure 3-2 Concept SSSA scope and Sydney Olympic Park metro station infrastructure, updated plan

The proposed refinement to the maximum GFA is minor, with the additional 960m² of GFA representing an increase of 1.4 percent of the total maximum GFA originally sought in the Concept SSSA. This has arisen from efficiencies in internal areas (such as reduction in the station plant level within Building 1 and relocation of the OSD entry lobby, enabling more commercial floor area within the podium, plus refinement of service core areas on each level in Buildings 2 and 3, enabling a minor increase in residential floor area). No change is sought to the exhibited building envelopes within the Concept SSSA, with the additional GFA to be contained within the maximum extent of these envelopes. These envelopes are within the 45 storey (RL 149) maximum height control.

The refinement would result in a slight increase in the Site 47 floor space ratio (FSR) from 5.96:1 to 6.05:1¹. This remains well within the maximum FSR control for Site 47 of 7:1.

The revised site-specific Design Guidelines have been revised to reflect the comments raised in the submissions and agency advice and will inform the detailed design of the development. As a result of the design refinement and clarifications listed above, plus the Request for Additional Information from DPPI, revised supporting plans and supplemental assessment reports have been prepared. These are referred to in Section 4 and Section 5 and specified under Section 1.3 above.

In line with NSW government objectives, Sydney Metro is investigating further refinement of the Concept SSSA to determine if additional residential land use is feasible within the proposed scheme, subject to further assessment and approval.

¹ The FSR calculations include the GFA attributed to the station uses, under the Stage 3 CSSI Approval

4 Response to submissions

4.1 Local council and government agency advice

Section 4.1 responds to local council and government agency advice. The text of each submission/advice matter is provided in the left-hand column, accompanied by the corresponding response in the right-hand column.

4.1.1 Sydney Olympic Park Authority

Table 4-1 Response to agency advice

No.	Issue raised	Sydney Metro response
1. Design clarifications		
SOPA1	The site is “25.7m above sea level” and has an “approximate fall of 3m in all directions”. Clarify/confirm that the 25.7m ground level is at the highest point of the site.	Site levels have changed since the EIS was exhibited in light of progress made in the excavation of the station being delivered under the CSSI Stage 1 Approval. The highest part of the site was 25.7m prior to excavation works starting. The Building Envelope Plans at Appendix H show the Ground Floor RLs.
SOPA2	Building Height RLs are provided without reference to building Ground Floor RLs or the 149m height limit. EIS Site Description – Topography 2.3.5 has the site at RL 25.7m with “an approximate fall of 3m...”.	The amended Building Envelope Plans at Appendix H include the Ground Floor RLs.
SOPA3	Figure 3-1 shows the podium for Building 2 extending further north than the podium for Building 1 which does not align with Figure 3-2 or Figure 3-3.	The revised Building Envelope Plans at Appendix H now show the northern edge of the Building 2 podium aligning with the Building 1 podium, consistent with the intent of Sydney Olympic Park Master Plan 2030 (Interim Metro Review).
SOPA4	Pedestrian access to the Metro station during event mode is not mentioned in the text (though is included on the Figure 3-3 diagram). How does the large area of ‘Station Lobby’ work in event mode? Can some of this area have a function in non-event mode to make use of dead floor space and activate the two frontages?	<p>The function and operation of the station is within the scope of the Stage 3 CSSI Approval, rather than the Concept SSDA. For this reason, reference to entry ‘modes’ is not made in the Concept SSDA EIS. Different entry modes relate to the control of barriers, rather than any physical change to station lobbies or how lobby areas are used.</p> <p>The revised Ground Floor plan in the updated Indicative Reference Scheme at Appendix I shows a revised station entry point on the Promenade, plus an additional small retail unit facing the Promenade. The OSD entry lobby within Building 1 is shown re-positioned adjacent to Figtree Drive – and therefore is separate from the station entry points. These measures show increased activation opportunities.</p>
SOPA5	<p>There may be safety concerns regarding the bicycle parking and end-of-trip facilities located on Level 3 being accessed via the loading dock of Building 1 as indicated. (Ref. Scheme Sheet 13).</p> <p>Where will Metro bicycle parking be located?</p>	The access design to internal cycle parking for Building 1 OSD is a dedicated entry point and lift from ground level on the west side of Building 1. It is not via the Building 1 loading dock, which would minimise any safety concerns for cyclists. See Ground Floor drawing DRG-202009 in the updated Indicative Reference Scheme at Appendix I.

	Buildings 2 & 3 residential bicycle parking is undersized, and access appears to be problematic - via Building 3 apartment lift lobbies? (Ref. Scheme Sheet 17). Please outline further how this will all work safely and be sized and accessed appropriately.	<p>Sydney Metro station bicycle parking will be provided as part of the CSSI Stage 3 Approval and the location will be confirmed as part of ongoing design and documented in the Station Design and Precinct Plan (SDPP) and Interchange Access Plan (IAP) for the site (as required under the CSSI Stage 3 Conditions of Approval).</p> <p>Dedicated residential basement cycle parking for Buildings 2 and 3 is shown accessed via a dedicated lift on the east side of Building 3 in the updated Indicative Reference Scheme – refer to drawing DRG-202018 at Appendix I.</p> <p>As detailed in the Traffic and Parking Report submitted with the Concept SSDA EIS (Appendix T), the bicycle parking rates are based on the Sydney Olympic Park Master Plan 2030 (Interim Metro Review) requirements. The reference scheme demonstrates that sufficient space is available for bicycle parking across the proposal, noting that details for Buildings 2 and 3 are indicative only and will be subject to detailed design and the Detailed SSDA process.</p>
SOPA6	The staging of the SSD Public Domain Scope area in relation to the other areas of public domain is unclear, particularly around the station entrances (Figure 3-8). Please clarify further.	<p>The public domain around the station entry points along the Promenade, Miluni Plaza and Central Urban Park will be delivered as part of the Stage 3 CSSI Approval. The details of the public domain for the Stage 3 CSSI Approval will be addressed in the Station Design and Precinct Plans required by the Stage 3 CSSI conditions of approval (notably Conditions E70, E71 and E72).</p> <p>Part of Precinct Street A and laneway between Building 2 and 3 is the only public domain scope included in the Concept SSDA boundary. The timing of design and delivery of Precinct A, including its interface with the Stage 3 CSSI public domain works, will be addressed in Detailed SSDA(s), and with reference to Sydney Olympic Park Authority’s Infrastructure Contributions Framework, October 2017 (ICF), or as amended.</p>
SOPA7	6.2.2 Tower Elements – “The Building 1 tower setbacks vary and include a 2.5m primary setback and nil secondary setback to Precinct Street B (due to structural requirements)”. The extent of tower within this 2.5m setback has previously been questioned, specifically the areas of amenities and corridor located within the setback. Note that the SOP Master Plan (2.4.5 Setbacks) states that “a 2.5m protrusion into secondary setback is permissible only for tower core, bracing and structural requirements.”	The OSD tower design is indicative and will be subject to the detailed design during the Detailed SSDA process. However, on the western façade of Building 1, positioning of the tower core is limited by the extent of the station below, resulting in the core protruding into the 2.5m secondary setback zone. The protrusion is limited to only lift core, structure, essential egress circulation and services, in line with Sydney Olympic Park Masterplan 2030 (Interim Metro Review) setback requirements and protrusion allowance.

	Also, it is stated that “Building 3 will have a maximum height of 45 storeys (RL 171.00)...”. Building height and final ground RLs require clarification.	See Figure 1.2.3 in the Chapter 4 Housing SEPP assessment at Appendix E, which shows the building separation between proposed OSD and future development at site 48. Ground floor RL figures have been added to the revised Building Envelope Plans at Appendix H.
SOPA8	Discrepancy between width of main open space (Figure 6-14) and Reference Scheme Site Plan (Sheet 03) which indicates reduced width of park. Site 40 building envelope and Site 47 Building 1 podium should align.	The main open space adjacent to the station building shown on EIS Figure 6-14 is consistent with the open space width indicated in the Sydney Olympic Park Master Plan 2030 (Interim Metro Review). Revised Indicative Reference Scheme have been prepared by Woods Bagot (see Appendix I) so that the width of the main open space adjacent to the northern station building is consistent. The main open spaces (plazas) will be designed and delivered under the Stage 3 CSSI Approval. The alignment of Site 40 building envelope and Site 47 Building 1 podium has been adjusted in the Building Envelope Plans at Appendix H.
SOPA9	Figure 6-1 does not show the proposed height of buildings as the Ground Level RL is not provided (in any of the EIS documentation including the Appendix G building envelope set). The Ground Level RL in relation to the Site RLs require clarification.	The ground floor RLs have been included on the amended Building Envelope Plans at Appendix H.
SOPA10	Site 40 Metro building envelope and width of adjacent park differs on Reference Scheme Site Plan.	The Site 40 building envelope and the width of the adjacent park are within the scope of the Stage 3 CSSI Approval, rather than the Concept SSDA. The Indicative Reference Scheme (Appendix I) have been updated to be consistent with the latest draft plans for Site 40.
SOPA11	Relates to EIS Figure 6-16: Access and egress routes for cyclists. Refer to comments on EIS section 3.6.	As outlined in the Traffic and Parking Report submitted with the Concept SSDA EIS (Appendix T of the EIS), the future north-south and east-west public domain (to be provided through the Stage 3 CSSI Approval) will provide off-road connectivity from the OSD and ASD buildings to the adjacent road and cycle networks. Existing infrastructure consists primarily of on-road cycle lanes, at moderate difficulty, with wide off-road shared paths around stadium areas. The surrounding roads have no dedicated cycle infrastructure, but are low speed environments that typically carry low volumes of vehicles. These routes are likely to be used by cyclists comfortable with sharing road space with vehicles.
SOPA12	Appendix E Built Form and Urban Design Report, Figure 2 shows the podium for Building 2 extending further north than	The revised Building Envelope Plans (Appendix H) have been updated to show the northern edge of the Building 2 podium aligning with the Building 1 podium,

	the podium for Building 1 which does not align with Figure 3-2 or Figure 3-3 nor the SOP Master plan Interim Review. This figure is used in other sections of the report and other appendices and is not compliant.	consistent with the intent of Sydney Olympic Park Master Plan 2030 (Interim Metro Review).
SOPA13	Appendix E, Figure 12 Pedestrian Movement – the diagram misrepresents the pedestrian connection to the area south of Figtree Drive, which should connect with the alignments of Precinct Streets A & B. This is an important planning consideration in regard to the interface of Site 47, Figtree Drive and areas to the south.	The pedestrian connection diagram (Figure 12 of the Built Form and Urban Design Report in Appendix E of the EIS and now at Figure 17 of the amended Site-Specific Design Guidelines at Appendix D) has been revised per Sydney Olympic Park Authority comments. The Promenade and Precinct Street A are envisaged to be the most-used north-south pedestrian connections. Precinct Street B (which would be delivered under the Stage 3 CSSI Approval) is also intended to include a designated route for pedestrians on its western side.
SOPA14	Appendix E, Figure 37 shows extent of non-residential and street activation at ground level for Buildings 2 & 3, but not for Building 1. The SOP Master Plan Interim Review controls require primary activated edges along the Building 1 promenade and frontage to Miluni plaza with secondary activated edges on Figtree Drive.	<p>Opportunities for resolving pedestrian connections and activation will be further developed during the detailed design stage.</p> <p>The fit-out and use of the non-station element of the Building 1 podium (i.e. the OSD) is part of the scope of the Concept SSDA. The station uses elements in the podium are within the scope of the Stage 3 CSSI Approval.</p> <p>The ground plane interface and street activation of the non-station uses elements are shown indicatively in the updated Concept SSDA Indicative Reference Scheme (Appendix I) and Demarcation Plans (Appendix J).</p> <p>The commercial OSD lobby is located on the corner with the Promenade and Figtree Drive and the scheme provides retail shops along Figtree Drive and the Promenade to activate these frontages. Refer to the updated Demarcation Plans (Appendix J) and updated Concept SSDA Indicative Reference Scheme (Appendix I). See also comment SOPA24.</p>
SOPA15	<p>Appendix E, pg50, Active Frontages (SOP MP 2.4.9) -</p> <ol style="list-style-type: none"> 1. Significant area of Station interface is inactive when not in event mode. Can some of this area have a function in non-event mode to make use of dead floor space and activate some of the two frontages? 2. Will the commercial ground floor frontage to the 'promenade' and lane be activated? 	The function and operation of the station is within the scope of the Stage 3 CSSI Approval, rather than the Concept SSDA. Different entry modes relate to the control of barriers, rather than any physical change to station lobbies, or flexibility for façade activation. Station entries to Building 1 are proposed from the north and via the Promenade to the east. Access via the Promenade will create activity and movement of people in that space. It is also noted that a function area in the non-event mode is a station operation matter, and so outside of the scope of the Concept SSDA.

	3. The inactivated south-west corner and length of facade is in a highly visible location.	Indicatively, the OSD commercial lobby within the Building 1 podium is re-positioned on the corner of Figtree Drive and the Promenade, with new retail units on the eastern elevation facing the Promenade and wrapping around along Figtree Drive. The retail frontage along Figtree Drive has been extended to the south-western corner of the building. See also comment SOPA24.
SOPA16	The Context Plan indicates potential issue with the connection of Precinct Road B across Figtree Drive to the station plaza. Refer to comments Sheet 09.	Precinct Street B will be designed and delivered as part of the Stage 3 CSSI Approval. Opportunities for resolving pedestrian connections and activation will be further developed during the preparation of Station Design and Precinct Plans and detailed design for the Stage 3 CSSI Approval.
SOPA17	<p>Building 1 tower envelope (with western envelope built to boundary) is significantly closer to the Site 48 tower than the minimum 24m separation proposed in the EIS (page 59, Residential Amenity).</p> <p>The Site 40 Metro Building footprint is larger (and park narrower) than in Sydney Olympic Park Authority Master Plan. This needs to be amended so as to not lose green open space for residents.</p>	<p>ADG Objective 2F states the following minimum separations for buildings of 9 storeys or more:</p> <ol style="list-style-type: none"> 1. 24m between habitable rooms / balconies 2. 18m between habitable and non-habitable rooms 3. 12m between non-habitable rooms <p>The updated Building Envelope Plans at Appendix H, updated Indicative Reference Scheme at Appendix I and in particular Figure 1.2.1 in the Chapter 4 Housing SEPP assessment at Appendix E demonstrate these minimum ADG separation distances between Buildings 1, 2 and 3 and also Site 40 can be complied with. Figure 1.2.1 in the Chapter 4 Housing SEPP assessment at Appendix E shows that a 21m building separation is provided, which complies with the habitable to non-habitable building separation requirements of 18m in the ADG.</p> <p>The alignment of Site 40 building envelope and Site 47 Building 1 podium has been adjusted in the Building Envelope Plans at Appendix H.</p>
SOPA18	Site 40 Metro Building – extent of station services envelope above the two storey height limit to be defined.	The Site 40 Metro Building is a key part of the Stage 3 CSSI works. The reduced height of the envelope is shown indicatively on section drawing DRG-002407 in the Building Envelope Plans at Appendix H.
SOPA19	Building Height RL 171.0 provided but not Ground Floor RL (nor in the Building Envelope Set of drawings). Ground Level given as 25.7m in EIS (page 23, Topography). Ground Level RL indicated in Building Envelope Set is presumably RL 22.0 (i.e.: Podium RL minus 18,000 podium height). Building height requires clarification.	Ground floor RLs for the buildings have been added to the Building Envelope Plans (Appendix H), therefore the height of each building in metres can be determined.

SOPA20	Shows Building 1 tower envelope built to boundary less than 20m from the Site 48 tower for its full length. Refer to comment above.	<p>The SOP Master Plan 2030 (Interim Metro Review) controls for Building 1 show a part 0m setback and a part minimum 2.5m setback. On the updated Indicative Reference Scheme at Appendix I Building 1 has a part 0m setback and part 3m setback.</p> <p>This Sydney Olympic Park Authority comment is also referring to Reference Drawing DRG-202006 and does not take account for the SOP Master Plan 2030 (Interim Metro Review) 2.5m minimum setback required for a tower on Site 48. Additional separation dimensions have been included on the Building Envelope Plans and Indicative Reference Scheme, as appended to this report.</p> <p>The updated Building Envelope Plans and Section 3.2 of the updated Chapter 4 Housing SEPP Report at Appendix E undertakes an assessment with regard to ADG Objective 2F criteria and demonstrates the proposed envelopes comply with the separation/visual privacy requirements.</p>
SOPA21	<p>Bicycle Parking and EOT - Is access to Level 3 via a lift requiring travel through the ground floor Loading Area acceptable. (Where will Metro bicycle parking be located?).</p> <p>Bicycle Parking requires clarification - Is the area for cycle parking and EOT adequate? Is this for Commercial only or for residential as well? Is the access for commercial parking via lobby lifts appropriate?</p>	Refer to response to SOPA5 where the same queries are addressed.
SOPA22	<p>Potentially poor street/pedestrian connection across Figtree Drive (crossing bus lanes) and past the dual loading bays and angled loading access road.</p> <p>Visually dominant south corner and end of west elevation dominated by services and plant. Inactivated south street corner (at ground level). Intermittent activation of both sides of Lane/"Promenade".</p> <p>Also inactivated frontage to Metro Plaza and significant length of lane when not in event mode. (Refer to SOP MP 2.4.9 Activate Frontages). How does the large area of "Station Lobby" work in event mode? Can some of this area have a function in non-event mode to make use of dead floor space and activate the two frontages?</p>	<p>Detail of pedestrian connections will be considered as part of detailed design and as part of the Station Design and Precinct Plan required under the Stage 3 CSSI conditions of approval. A pedestrian crossing is intended as part of the CSSI works at the south end of the Promenade to connect across Figtree Drive.</p> <p>The updated Indicative Reference Scheme and Demarcation Plans now show the OSD entry lobby within Building 1 re-positioned on the corner of Figtree Drive and the Promenade, with new retail units on the eastern elevation (facing the Promenade), and also wrapping around the south-west and south-east corners of Building 1. Refer to Building 1 Ground Floor Plan in revised Demarcation Plans and Indicative Reference Scheme appended. See also comment SOPA24.</p> <p>The function and operation of the station is within the scope of the Stage 3 CSSI, rather than the Concept SSDA. Different entry modes relate to the control of barriers, rather than any physical change to station lobbies, or flexibility for façade activation.</p>

SOPA23	Appendix H, pg14: How much of the tower "core" protrusion to the boundary on the southwest façade is "tower core, bracing and structural requirements"? (SOP MP 2.4.5 Setbacks). Please clarify if the desire for a 1500 sq metre commercial floor plate has determined the envelope of the building on this site.	The shell of the Building 1 podium was approved under the Stage 3 CSSI. The OSD tower designs are indicative and will be subject to the detailed design during the Detailed SSDA process. See response to comment SOPA 7 and Figure 1.2.3 in the Chapter 4 Housing SEPP Report at Appendix E regarding protrusions and setbacks. The Building 1 OSD commercial floorplate is also indicative and would be sub-divisible to meet future tenant requirements.
2. Economic, environmental and social impacts of the proposal		
SOPA24	Does the "promenade" comply with Activation of Laneways (SOP 1.3.8) which stipulates: "Activated frontages on two parallel edges"; "Blank walls should be avoided"; and "Provide cycle parking and cycle share facilities in immediate surrounds"? How can it be ensured that the area of Commercial fronting the Promenade and Plaza at ground level will be activated? Precinct Street A does not appear to "provide limited short-term parking for delivery / drop-off" or for "EV charging" (SOP 1.3.7).	Opportunities for resolving pedestrian connections and activation of the Promenade (taking into consideration the operational requirements of the new Metro station) are constrained. However, the updated Demarcation Plans (Appendix J), Indicative Reference Scheme (Appendix I) and Figure 9 of the updated Site-Specific Design Guidelines (Appendix D) illustrates that provision for activated retail and commercial uses can be made along the Promenade. Operational and functional requirements of the station and buildings cannot practically ensure that whole façades at ground floor can be activated. Potential for provision for short-term parking or EV charging spaces along Precinct Street A will be further developed as the future buildings are designed in the Detailed SSDA(s). Metro (station) cycle parking will be delivered through the Stage 3 CSSI Approval.
SOPA25	Consideration will need to be given as to how this space is passively surveilled outside of the operations of the Metro station and/or the surround retail uses and the planting and street furniture within the Fig Tree Drive Entry Plaza will need to allow for views from Figtree Drive to the outdoor lobby. The statement "Ensure all building layouts in the precinct are not creating blind spots or concealment opportunities." is incompatible with the ground plane layout currently proposed within Appendix E and H.	Resolution of crime prevention through environmental design (CPTED) matters will be considered as part of the design development of the Station Design and Precinct Plan and Interchange Access Plan (IAP) (under the Stage 3 CSSI Approval) and the Detailed SSDA(s) for the OSD and ASD.
SOPA26	Visual privacy - "A minimum of 24m is proposed between the proposed buildings and adjacent sites" (Site 48 and Site 46)".	Refer to responses to comments SOPA7, 17 and 20 which address this matter.

	Can this be achieved between the Building 1 tower (built to boundary) and tower envelopes proposed for Site 48?	
SOPA27	<p>The visual impact of the proposal from within the precinct, and/or from street level, should also be considered. For example, the street level view towards Building 1 from Olympic Boulevard and the western end of Figtree Drive is to a visually dominant corner and building elevation.</p> <p>The reference scheme shows an inactivated street corner at ground level (switch room; water meters; fire cupboards). The very exposed 18m high wall of station plant is exacerbated by the length of tower "core" built to the boundary.</p>	<p>The Indicative Reference Scheme simply shows what could be built within the proposed built envelopes. The non-station uses (commercial/retail and OSD entry) which form part of the Concept SSDA uses on the south elevation of Building 1 have been revised in the Indicative Reference Scheme to increase activation on prominent areas of the ground floor, notably on the eastern elevation fronting the Promenade and also facing Figtree Drive, plus on the south-west corner visible from Olympic Boulevard. Building envelopes are proposed for assessment and determination under this Concept SSDA. Building 1 non-station uses in the podium, the OSD and Buildings 2 and 3 will be subject to further detailed design and Detailed SSDA(s).</p>
SOPA28	<p>The EIS does not address impacts of building reflectivity to flying wildlife, particularly birds and bats. Death and injury to wildlife due to collision with buildings is a frequent occurrence at Sydney Olympic Park, and new buildings should be designed to reduce this risk.</p> <p>Recommended Condition of Consent: Detailed building design must incorporate bird friendly design features that reduce risk of birdstrike.</p>	<p>Reflectivity design will be subject to the detailed design during the Detailed SSDA process.</p> <p>Consideration of design features which reduce risk of birdstrikes would be detailed through the Detailed SSDA.</p>
SOPA29	<p>The EIS does not address impacts of lightspill on nocturnal wildlife. Lightspill should be minimised through to use of focused, downward facing lights as per Sydney Olympic Park Authority's Green Star Credit Commitment.</p> <p>Recommended Condition of Consent: As per Sydney Olympic Park Authority's Green Star Credit Commitment, 95% (by number) of all external public lighting luminaries within the project site boundary must have an Upward Light Output Ratio of less than 5%.</p>	<p>Lightspill analysis will be subject to detailed design and assessment during the Detailed SSDA process. Precinct Street A and the laneway between Building 2 and 3 are included as public domain in the Concept SSDA boundary, which would have street lighting. An objective will be to minimise lightspill (including upward) through this detailed design. The Sydney Metro West Station and Precinct Design Guidelines would apply to the detailed design of the public domain areas for the Stage 3 CSSI Approval, which require the consideration of lightspill. This would be assessed and documented in the Station Design and Precinct Plans for the Stage 3 CSSI Approval.</p>
SOPA30	<p>MUSIC calculations appear to have been based on typical urban runoff data and not on the local water quality data, as there were no mention or references. MUSIC calculations should be made with local water quality data.</p>	<p>Refer to section 4.1 of Appendix L – Addendum to Preliminary Integrated Water Management Report. The urban runoff data and evapotranspiration data has been reviewed and updated to be in accordance with the Sydney Olympic Park MUSIC Modelling Guideline. The water quality data adopted in the updated MUSIC</p>

		modelling is based on the current City of Parramatta Council water quality data which consists numerous data ranging from 1984 to 2007.
SOPA31	MUSIC calculations appear to have been based on typical data, assuming the ability of such basins (rain gardens) to remove pollutants while the trees/sedges are growing well. But given three tall buildings on the development site, two tall buildings in the nearby site and also more are likely within 100m radius, the shadows are supposed to diminish the ability of such trees/sedges to grow well. The reduced growth must be diminishing the pollution reduction capacity. It is not clear if the MUSIC calculations have considered reduced level of pollution reduction performance and, hence whether still meeting the Sydney Olympic Park Authority WSUD Guidelines. Detailed Integrated Water Management Report should (a) take into consideration projections from Detailed Shadow Impact Report regarding MUSIC calculations for Bio-retention basins (b) align with Sydney Olympic Park Authority WSUD Guidelines.	<p>Refer to section 4.2 of Appendix L– Addendum to Preliminary Integrated Water Management Report. Using the latest architectural and landscape plans as a baseline layout, water sensitive urban design (WSUD) treatment trains have been identified. Additional water quality devices and strategies have been proposed to ensure the compliance of the stormwater strategy, including the following additional measures:</p> <ul style="list-style-type: none"> • 2x stormwater filter cartridges • 96m² of rain gardens/tree pits • 7 Oceanguard (gully pit inserts). <p>As outlined in Table 4-3 of Appendix L, the proposed working treatment train satisfies Sydney Olympic Park Authority baseline pollution reduction targets for stormwater harvesting catchment.</p>
SOPA32	Given the expected change in groundwater direction towards the excavation box the potential for landfill leachate to migrate into the excavation must be addressed. In accordance with the POEO Act and Waste Regulation landfill leachate cannot be dewatered to stormwater or receiving waters. It must be contained and transferred to a facility that can lawfully receive that waste. The distinction between contaminated groundwater and landfill leachate should be made with clear requirement to identify and manage leachate and/or seek approval from the NSW EPA as the Regulatory Authority for alternative options under an Environment Protection License that would be issued for the works.	<p>Concept SSDA EIS Appendix Z (Contamination Report) identifies landfills in the vicinity of the site as potential contamination sources to local groundwater and that the site can be made suitable for its proposed use, following the completion of any remedial works required.</p> <p>It is noted that the Concept SSDA does not enable any physical construction works. Extraction of groundwater for construction would occur following or during remedial works (if required) and (as indicated in EIS Appendix Z) would be treated to remove any contamination prior to being discharged.</p>
SOPA33	Contamination Report states that with the development "the excavation is assessed to act as a groundwater sink, causing groundwater to flow towards the Concept SSDA site" Again, regardless of the chemical composition, the POEO Waste Regulation do not permit discharge of leachates. This needs to be clearly addressed.	The nearest potential leachate source is approximately 200m hydraulically down gradient under natural flow conditions. Construction is expected to alter the flow regime, which could see groundwater contaminated by leachate migrating towards the site. EIS Appendix Z identifies that the site (including groundwater) can be made suitable for its proposed use, following the completion of any remedial works required.

		Extraction of groundwater for construction would occur following or during remedial works (if required) and as indicated in EIS Appendix Z would be treated to remove any contamination prior to being discharged.
SOPA34	<p>In relation to hazardous ground gases the report must acknowledge upfront the potential increase in gas that could directly result from the groundwater sink and possible the gas intrusion risk.</p> <p>AEI-30 - In relation to vapours and ground gases, it should be recognised that the change in groundwater direction may specifically increase ground gases within the landfill. These may migrate into the area of the development however the risk to the public of gas migrating to the surface of the landfill as a direct result of the Metro project should not be ignored. All risks as a direct result of the project must be addressed. Existing gas mitigation infrastructure was installed as part of the 2000 remediation may not be adequate to manage this increased landfill gas generation that may result.</p>	<p>EIS Appendix Z identifies the nearby landfills as a potential source of contamination. As a result, methane is included in the list of potential contaminants occurring at the site.</p> <p>The potential contamination identified in EIS Appendix Z will be further considered during design for the Detailed SSDA(s) and subsequent construction phase. The site will be made suitable for its proposed use following the completion of remedial works (if required).</p>
SOPA35	<p>AEI - 31 Aquatic Centre Landfill is a dry tomb construction with leak detection. Potential for contaminated groundwater migration from AEI 31 to be present at depth within the Concept SSDA site is low. However, the site was remediated not cleaned up and therefore some residual contamination may be present outside the waste cells and this may present some, although low risk. The information should be amended to more accurately reflect the information.</p>	<p>Regardless of the landfill construction, Concept SSDA EIS Appendix Z identifies AEI 31 as a potential contamination source.</p> <p>The potential contamination identified in Appendix Z will be further considered during design for the Detailed SSDA(s) and subsequent construction phase. The site will be made suitable for its proposed use following the completion of remedial works (if required).</p>
SOPA36	<p>Further investigation and monitoring of HGG should be considered for both the construction and operational phases of the proposed development." However, landfill gas consequence can be high particularly within explosive range. The report should include consideration of consequence to human health and environment.</p>	<p>Assessing the impact from each individual contaminant is outside of the scope for a contamination assessment prepared as part of a Concept SSDA EIS and is not possible to assess without further detail regarding building design.</p> <p>EIS Appendix Z identifies the nearby landfills as a potential source of contamination. As a result, methane is included in the list of potential contaminants occurring at the site.</p> <p>The potential contamination identified in EIS Appendix Z will be further considered during design for the Detailed SSDA(s) and subsequent construction phase. The site will be made suitable for its proposed use following the completion of remedial works (if required).</p>

SOPA37	Contamination Report, groundwater section does not attempt to distinguish potential contaminated groundwater from leachate and the different regulatory requirements that apply.	<p>As identified in EIS Appendix Z, the nearest potential leachate source is approximately 200 metres hydraulically down gradient under natural flow conditions. Construction is expected to alter the flow regime, which could see groundwater contaminated by leachate migrating towards the site. Appendix Z identifies that the site (including groundwater) can be made suitable for its proposed use, following the completion of any remedial works required.</p> <p>Extraction of groundwater for construction would occur following or during remedial works (if required) and, as indicated in EIS Appendix Z, would be treated to remove any contamination prior to being discharged.</p>
SOPA38	<p>Recommend Condition of Consent: Prior to commencement of construction the proponent must develop and implement a Hazardous Ground Gases Monitoring Plan to</p> <p>(a) monitor, assess and respond to any landfill gas ingress into the area of SSDA and</p> <p>(b) monitor, assess and respond to the impact of the works on changes in landfill gas generation rates and flow within the Former Golf Driving Range Landfill. The HGG plan to be prepared in consultation with Sydney Olympic Park Authority for the review and approval of an accredited NSW EPA Site Auditor. A copy to be provided to the NSW EPA.</p>	<p>Given the site is 200 metres away from the landfill it is unlikely the proposed development will have a direct impact on the landfill. Many factors affect gas generation, including atmospheric conditions, rainfall and age of the landfill mass. It is unreasonable for Sydney Metro to be responsible for changes in landfill gas generation rates.</p> <p>In addition, EIS Appendix Z identifies the nearby landfills as a potential source of contamination. As a result, methane is included in the list of potential contaminants occurring at the site.</p> <p>The potential contamination identified in EIS Appendix Z will be further considered during design for the Detailed SSDA(s) and subsequent construction phase. The site will be made suitable for its proposed use following the completion of remedial works (if required). The need for a condition to develop a monitoring plan as suggested by Sydney Olympic Park Authority will be determined as part of the assessment for the Detailed SSDA(s).</p>

4.1.2 NSW Environment and Heritage (formerly Department of Planning and Environment – Environment and Heritage Group)

Table 4-2 NSW Environment and Heritage Advice

No.	Matters raised	Sydney Metro response
1. Economic, environmental and social impacts of the proposal		
EH1	In issuing this BDAR Waiver Request EHG advised that it supports the Sydney Olympic Park Authority's recommendation that stormwater runoff (at all stages) be diverted from the Northern Water Feature (NWF) so that Green and Golden Bell Frog Habitat is not impacted. This	Refer to Section 3.1 of Appendix L – Addendum to Preliminary Integrated Water Management Report. Sydney Olympic Park Authority has clarified following a meeting held on 14 June 2023 (and in a letter of the same date) that whilst there is expected to be a hydraulic impact arising from the Concept SSDA proposal on the Northern Water Feature (NWF), this is not expected to be significant. However,

	<p>Concept Application and future SSDs should advise how this recommendation will be complied with.</p>	<p>Sydney Olympic Park Authority has requested that stormwater design at the Detailed SSDA stage:</p> <ul style="list-style-type: none"> • Further explores options to minimise stormwater flow to the NWF; and • Complies with Sydney Olympic Park Authority’s Stormwater Management and WSUD Policy <p>Section 3.1 of Appendix L states that the current submitted Concept SSDA stormwater strategy for the Sydney Olympic Park metro station development has incorporated Drainage On-Site Detention (DOSD) to attenuate the additional flow from the development in order for the post development discharge flow to be equal or no greater than pre development discharge flow.</p> <p>The current stormwater strategy and design have been developed to satisfy Sydney Olympic Park Authority drainage requirements as specified in the Sydney Olympic Park Authority Stormwater Management and WSUD Policy dated October 2016.</p> <p>While the post development discharge flow is controlled, the volume of stormwater generated from the post development will increase. In consultation with Sydney Olympic Park Authority, this increase of volume of stormwater should be able to be mitigated through detailed design and/or by other developments to minimise stormwater flow to NWF. This consideration shall be explored at the Detailed SSDA stage.</p>
<p>EH2</p>	<p>The modelling shows flooding in a PMF event in Figtree Drive at the east of the site, at the intersection with Precinct Street A. The modelling indicates depths of 0.1-0.2m and 0.2-0.3m, which would limit access to and evacuation from Precinct Street A.</p> <p>EHG recommends that the main driveway entry be in Figtree Drive, to the west of this flooding to enable access in all flood events. EHG further recommends consultation with the SES regarding emergency management. If Precinct Street A is used as the main vehicular access, Buildings 2 and 3 will not have flood free access in all flood events, contrary to the reporting.</p>	<p>Refer to Table 3-1 in Appendix N – Addendum to Flooding Report. It states that in the PMF event Figtree Drive at the intersection with Precinct Street A experiences hazard category H1 with flood depths of up to 0.31m. Given the maximum flood depths are at the limiting still water threshold for this hazard category, it is noted that hazard category H2 is not considered safe for small vehicles. Consequently, horizontal evacuation from the precinct to Figtree Drive via Precinct Street A may not be safe in all circumstances.</p> <p>On that basis and in the context of the current design, it is noted that other options exist for evacuation including:</p> <ul style="list-style-type: none"> • Evacuation by foot through the Promenade and onto Figtree Drive (H1 category areas) • Evacuation by foot through the Sydney Olympic Park metro station public areas onto Precinct Street B to access Figtree Drive (H1 category areas) • Sheltering in place within an over station or adjacent station development.

		<p>This matter and consultation with the NSW SES regarding emergency management (if required) would be considered further by the Detailed SSDA.</p> <p>Whilst not a matter for this application, it is noted that the conditions of approval for the Stage 3 CSSI Approval require the development of operational emergency management plans for flooding. Consequently, it is expected that those arrangements would consider relevant matters such as the preferred evacuation arrangements for this metro station. This potentially presents further option(s) which may be considered by the Detailed SSDA.</p>
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4.1.3 NSW Department of Climate Change, Energy, Environment and Water – Water Group (formerly Department of Planning and Environment – Water team)

Table 4-3 Response to DPPI – Water

No.	Issue raised	Sydney Metro response
WG1	<p>Water entitlements</p> <p>Recommendation – Post approval</p> <p>That the proponent ensures that the EIS for the final detailed design:</p> <p>a) quantifies the maximum annual volume of water take due to aquifer interference activities when undertaking the final detailed design of the basement levels as required for the project, and</p> <p>b) demonstrates sufficient entitlement can be acquired in the relevant water source unless an exemption applies.</p>	<p>It is noted this is a post-approval recommendation. The recommendation will be considered and addressed as appropriate at the Detailed SSDA stage.</p>
WG2	<p>Recommendation – Post approval</p> <p>That the proponent ensures sufficient water entitlement is held in a water access licence/s to account for the maximum predicted take for each water source prior to take occurring unless an exemption applies.</p>	<p>It is noted this is a post-approval recommendation. The recommendation will be considered and addressed as appropriate at the Detailed SSDA stage.</p>

<p>WG3</p>	<p>Groundwater management</p> <p>Recommendation – Post approval</p> <p>That the proponent ensures that the EIS for the final detailed design of the basement levels includes an assessment against the Aquifer Interference Policy (2012), and if impacts exceed the minimal impact considerations that a tanked basement is adopted.</p> <p>DPHI Water recommends that the EIS for the final detailed design include an assessment against the Aquifer Interference Policy (2012).</p>	<p>It is noted this is a post-approval recommendation. The recommendation will be considered and addressed as appropriate at the Detailed SSDA stage.</p>
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4.1.4 Transport for NSW

Table 4-4 Response to Transport for NSW Advice

No.	Matters raised	Sydney Metro response
<p>TfNSW1</p>	<p>TfNSW advises that the amount of car parking is reduced and public transport and active transport modes are promoted over car driving – this is consistent with The Future Transport Strategy (Future Transport (nsw.gov.au) in which Travel Demand Management (TDM) is one of TfNSW key actions.</p>	<p>Noted and accepted. The maximum car parking provision stated in the Concept SSDA parameters is significantly below the maximum permitted car parking provision in controls.</p>
<p>TfNSW2</p>	<p>TfNSW appreciates the proposed parking for bicycles at Buildings 1-3. TfNSW recommend that this bicycle parking and any EoT be monitored over time to ensure sufficient supply to encourage active transport both to/from the site, for staff, residents and visitors. The bicycle parking should be located at the development site at convenient locations, be safe, secured and under cover. Some further guidance on bicycle parking and end of trip facilities can be found in the cycleway design toolkit.</p>	<p>Noted and accepted in principle, subject to detailed wording of any related conditions of consent.</p> <p>The Cycleways Design Toolbox document will be examined for further guidance at the Detailed SSDA stage.</p>
<p>TfNSW3</p>	<p>It is unclear whether the 10km/h Shared Zones will be gazetted as private or local. Shared public roads will need to</p>	<p>Figure 1-3 in the Concept SSDA EIS is duplicated from the Submissions Report for the Stage 3 CSSI. It shows the Stage 3 CSSI indicative layout, rather than the</p>

	be designed in accordance with relevant Shared Zone policy documents and the suitability reviewed by TfNSW.	<p>Concept SSDA indicative layout. The proposed shared zones (Precinct Street B) shown in Figure 1-3 are outside the application site for the Concept SSDA.</p> <p>The two parts of Precinct Street B are nominated in the Interface Agreement to be dedicated to Sydney Olympic Park Authority as a local street. Detailed design is to be undertaken in respect of access and the Station Design and Precinct Plans (SDPPs) under the Stage 3 CSSI Approval, with delivery by Sydney Metro.</p>
TfNSW4	<p>Tab B outlines proposed conditions of consent. These relate to:</p> <p>Preparation of a Green Travel Plan for the OSD and ASD (to include mode share targets and strategies to encourage use of sustainable transport options, details of cycle parking and EOT facilities, plus car parking management strategies</p> <p>Preparation of Travel Access Guide (TAG), to be appended to the GTP, to include route maps, timetables, EOT details</p> <p>Construction Pedestrian and Traffic Management Plan (CPTMP).</p>	Sydney Metro accepts the intent of the proposed conditions of consent in principle, subject to agreement of the specific wording.

4.1.5 Heritage NSW (Aboriginal Cultural Heritage)

Table 4-5 Response to Heritage NSW (Aboriginal Cultural Heritage)

No.	Matters raised	Sydney Metro response
ACH1	Heritage NSW agrees with the management recommendations outlined, and as such, has no additional comments with respect to the proposed development proceeding. Heritage NSW does not require any further agency consultation in relation to this project.	Noted and accepted.

4.1.6 Heritage NSW

Table 4-6 Response to Heritage NSW Advice

No.	Matters raised	Sydney Metro response
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HNSW1	<p>Based on the assessment provided, Heritage NSW agrees with the management recommendations outlined, and as such, has no additional comments with respect to the proposed development proceeding. Heritage NSW does not require any further agency consultation in relation to this project.</p> <p>The subject site is not listed on the State Heritage Register (SHR), nor is it in the immediate vicinity of any SHR items. Further, the site does not contain any known historical archaeological relics. Therefore, no further heritage comments are required. The Department does not need to refer subsequent stages of this proposal to the Heritage Council of NSW.</p>	Noted and accepted.
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4.1.7 Fire and Rescue NSW

Table 4-7 Response to Fire and Rescue NSW Advice

No.	Matters raised	Sydney Metro response
FRNSW1	<p>FRNSW have reviewed the EIS and have deemed that the proposal has limited scope and application in regard to special hazards or special problems of firefighting. FRNSW submit no comments or recommendations for consideration, nor any requirements beyond that specified by applicable legislation.</p> <p>While there is currently no requirement for a Fire Safety Study, FRNSW may recommend one be undertaken at a later stage should information be provided such that the development is deemed to pose special problems of firefighting or special hazards exist that require additional fire safety and management measures.</p>	Noted and accepted in principle.

4.1.8 NSW Environment Protection Authority

Table 4-8 Response to EPA Advice

No.	Matters raised	Sydney Metro response
EPA1	On 3 February 2022 the EPA wrote to the DPHI commenting that no further consultation on this proposal was required.	Noted and accepted.

4.1.9 Sydney Metro

Table 4-9 Response to Sydney Metro Advice

No.	Matters raised	Sydney Metro response
SM1	Sydney Metro are the Applicant and have been involved in the design of the proposal. Consequently, Sydney Metro has no comments to make on the application.	Noted and accepted.

4.1.10 NSW RFS

Table 4-10 Response to NSW RFS Advice

No.	Matters raised	Sydney Metro response
RFS1	The NSW Rural Fire Service has reviewed the information provided and advises that there are no specific concerns with the proposal relating to bush fire protection.	Noted and accepted.

4.1.11 Sydney Water

Table 4-11 Response to Sydney Water Advice

No.	Matters raised	Sydney Metro response
SW1	<p>The water and wastewater system should have adequate capacity to service the proposed development in the short term. Amplifications, adjustments, and/or minor extensions may be required.</p> <p>However, if any reticulation amplification is required beyond 2026, the current servicing plan is required to be revisited and reassessed at the S73 application phase. We request</p>	<p>An Addendum to the Concept SSDA EIS Appendix EE – Preliminary Station Utilities & Infrastructure Servicing Assessment has been prepared to respond to this agency advice and is provided at Appendix M to this document. Through this addendum, the water and wastewater demands have been re-forecast to include the most up to date indicative architectural arrangements in the Concept SSDA.</p> <p>It is recommended that the Detailed SSDA preparation includes additional consultation with Sydney Water; similarly outlined in the Concept SSDA EIS</p>

	<p>that the proponent complete a Sydney Water Growth data form, in Appendix 1, to provide an ultimate and annual staging plan as part of the next lodgement in order for Sydney Water to assess timescale impacts more readily.</p>	<p>Appendix X – Integrated Water Management Report (Sydney Metro, 2022), to address agency comments.</p> <p>It is premature to determine whether there will be adequate capacity available for the time the proposed development would become operational. Once the quantum of development to be constructed is known and it has planning certainty at the Detailed SSSA stage, the Section 73 application will be made and any need for reticulation amplification and/or minor extensions can be determined with more certainty.</p>
SW2	<p>Consideration should be given to rainwater capture and stormwater runoff reduction for the proposed development.</p> <p>It is recommended that integrated water management provision via dual-pipe controls is implemented for the subject redevelopment in line with the wider GOP recycled water initiatives and Parramatta Councils' vision for its area, including initiatives such as the installation of dual reticulation systems to support immediate or future connections to a recycled water network.</p> <p>Council's measures for high performing buildings and dual piping for alternative water sources will be instrumental in helping market viability for both public and private water providers and ensuring recycled water usage can be fully optimised across the precinct.</p> <p>Sydney Water is currently developing an integrated water management plan for the Greater Parramatta and the Olympic Peninsula (GOP) Growth Area and is working together with Sydney Olympic Park Authority to seek cost-effective recycled water solutions and continued recycled water service to Sydney Olympic Park Authority's customers.</p>	<p>In Section 3 of the Addendum provided at Appendix M to this document updated indicative potable water and wastewater demands have been calculated to clarify potential future demands. These will be reviewed and recalculated as needed at the Detailed SSSA stage once the development details and GFA are more certain. Sydney Water comments have been acknowledged and will be noted through the detailed design process, in conjunction with on-going discussions with Sydney Olympic Park Authority.</p> <p>As agreed with Sydney Olympic Park Authority, harvesting rainwater and stormwater (on site storage tanks) in the Water Reclamation and Management Scheme (WRAMS) catchment shall be avoided as this stormwater is already captured and reused through Sydney Olympic Park Authority's existing system</p>

4.1.12 Sydney Trains

Table 4-12 Response to Sydney Trains Advice

No.	Matters raised	Sydney Metro response
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ST1	(Sydney Trains) have no comment on the proposed development works associated with the above Concept State Significant Development application, at this stage.	Noted and accepted.
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4.1.13 City of Parramatta Council

Table 4-13 Response to City of Parramatta Council Advice

In its submission letter for the Concept SSDA, the City of Parramatta Council (Council) stated it has no further comments to add other than that forwarded to DPHI during exhibition of the Draft Sydney Olympic Park Master Plan 2030 (Interim Metro Review). These are contained in Council's letter dated 15 December 2021. Responses are provided below. Further, Council also stated that detailed stormwater and flooding information would be required for consultation once the Detailed SSDA is lodged.

No.	Matters raised	Sydney Metro response
CoPC1	<p>Reduction of green space:</p> <p>The Interim Metro Review includes a reduction of the Urban Park – Central.</p> <p>The reduction in size in this location and context is inappropriate and is not supported.</p> <p>The quantum of green space in this area [in the Sydney Olympic Park Master Plan 2030 (Interim Metro Review)] should not be offset with embellishment of nearby parks. Additional green space should be provided commensurate with the increase in density that is publicly accessible and usable for incoming residents.</p>	<p>DPHI considered the issue of open space in its Finalisation Report (June 2022) for the SOP Master Plan 2030 (Interim Metro Review). It determined (at page 28) that with the inclusion of a new public plaza (Miluni Plaza) in the Master Plan, there would be a net increase in open space in the Central Precinct. In addition, other local parks, and a regional park (Bicentennial Park) would meet the needs of future populations.</p> <p>The Concept SSDA does not amend the approved Master Plan or the strategy for planned green space provision in the precinct. The Stage 3 CSSI Approval will deliver open space and public domain adjacent to the Concept SSDA site. The Indicative Reference Scheme (Appendix I) includes provision for private and communal open spaces which meet or exceed ADG targets. The combined communal space is equal to 30% of the Concept SSDA site area.</p>
CoPC2	<p>Proposed residential component:</p> <p>Concern in relation to the proposed increase in residential GFA [in the Sydney Olympic Park Master Plan 2030 (Interim Metro Review)] encroaching into the commercial core.</p> <p>Commercial uses would be more suitable for areas that would be subject to high noise levels and traffic volumes.</p>	<p>The configuration of uses proposed in the Concept SSDA is consistent with the permissible uses for Site 47 in the SOP Master Plan 2030 (Interim Metro Review) and land use controls in <i>State Environmental Planning Policy (Precincts—Central River City) 2021</i> (Central River City SEPP).</p> <p>DPHI considered Council's submission regarding potential noise impacts on residential uses in its Finalisation Report for the SOP Master Plan 2030 (Interim Metro Review). At page 37 of the Finalisation Report, DPHI concluded that residential uses in the commercial core is acceptable due to: Detailed design of all future buildings will need to include appropriate noise mitigation measures; and</p>

		<p>the next full review of the Master Plan can assess and include management for noise concerns.</p> <p>A noise assessment report is part of the Concept SSDA EIS and mitigation measures proposed are stated in Appendix B to this Submissions Report. Noise mitigation measures for the external residential ASD façades will need to be explored at the Detailed SSDA stage due to high noise events within sporting and entertainment venues in Sydney Olympic Park. Further assessment would therefore take place as part of detailed design for Detailed SSDAs.</p>
CoPC3	<p>Reduction in commercial floor area:</p> <p>The Central Precinct is identified as a key commercial hub within Sydney Olympic Park, however the proposed changes to the Master Plan seek a reduction of non-residential floor area.</p> <p>Council officers do not support any reduction to non-residential floor area within such proximity to key transport infrastructure.</p>	<p>The land use controls for the precinct is B4 – Mixed Use, where residential and commercial uses are permissible. The Master Plan does not require a minimum quantum of commercial floor area. The configuration of uses proposed in the Concept SSDA is consistent with the permissible uses for Site 47 in the SOP Master Plan 2030 (Interim Metro Review) and land use controls in Central River City SEPP.</p> <p>Adjacent sites may contribute to the creation of further commercial floor area as development proposals come forward.</p>
CoPC4	<p>Proposed Transport Strategy:</p> <p>Concerns related to the design capacity of the Sydney Metro station at Sydney Olympic Park, design for private vehicle and freight access, lack of consideration for non-Parramatta Light Rail Stage 2 scenarios and encouragement of centrally managed green travel planning</p>	<p>The Concept SSDA relates primarily to OSD and ASD. The infrastructure design capacity of the Metro station and the movement network are components of the Stage 1 and Stage 3 CSSI approvals. The proposed GFA and FSR for the Concept SSDA (6.05:1) is within the Master Plan and Central River City SEPP controls (7:1). Modelling in the Transport Strategy (WSP, August 2021) accompanying the Interim Metro Review documentation does not rely on PLR Stage 2 and transport planning scenarios acknowledge it is an uncommitted project.</p> <p>Conditions of consent for the Concept SSDA would be accepted in principle relating to preparation of a Green Travel Plan for the OSD and ASD (to include mode share targets and strategies to encourage use of sustainable transport options, details of cycle parking and EOT facilities). Centrally managed green travel planning would be more relevant for Sydney Olympic Park Authority to consider for the precinct as a whole.</p>
CoPC5	<p>Bus servicing and interchange:</p> <p>Council supports provision of a bus interchange adjacent to the Metro station but specifies the need for planning for</p>	<p>Bus interchange provision is considered under the interchange access works for the Stage 3 CSSI Approval. Bus route planning is beyond the scope of the Concept SSDA.</p>

	services from surrounding suburbs. Routes should be planned as part of the Master Plan Interim Metro Review.	
CoPC6	<p>Car parking provision:</p> <p>Consider car parking requirements for new development which will help reduce private vehicle usage and increase use of public transport, walking and cycling</p>	<p>Applying car parking ratios at Appendix E of the SOP Master Plan 2030 (Interim Metro Review), the Concept SSDA EIS identifies that approximately 660 car parking spaces could be provided. However, car parking provision is capped at a maximum of 358 car spaces in the Concept SSDA proposal to reduce private car usage associated with the development proposal and encourage use of sustainable transport modes.</p>
CoPC7	<p>Cycling:</p> <p>Cycling is a key component of the transport strategy within Sydney Olympic Park and cycle routes need to be included in the street hierarchy plan.</p>	<p>Indicative cycle routes are included in the figures in the SOP Master Plan 2030 (Interim Metro Review). Precinct Street A and Precinct Street B will facilitate cycle access. Provision for access to cycle parking and end-of-trip facilities is included in the Indicative Reference Scheme for the Concept SSDA and will encourage cycle use to travel to/from the development proposal.</p>
CoPC8	<p>Urban Design</p> <p>More detail needs to be provided to demonstrate how the changes to the built form identified in the Interim Metro Review can meet the building depth provisions under current controls contained in the Sydney Olympic Park Master Plan 2030 Review 2018 (Part 4.0).</p> <p>Significant increases in building heights will result in additional overshadowing impacts to the south.</p>	<p>The Concept SSDA seeks approval for building envelopes. Detailed design will follow as part of the Detailed SSDA preparation and assessment process. Relevant guidelines and controls relating to building depth will inform the detailed design approach.</p> <p>Building Depth:</p> <p>Section 4.6.3 of the Sydney Olympic Park Master Plan 2030 Review 2018 provides the following requirements:</p> <ol style="list-style-type: none"> 1. Ensure the maximum building depth is 18m (glass line to glass line) for all residential building floorplates. 2. The preferred maximum commercial building depth without atria and light wells is 25m. <p>As shown on the updated Indicative Reference Scheme (Appendix I), Building 2 has a residential floorplate depth of 19.1m and Building 3 has a residential floorplate depth of 22.5m. However, provision of balconies reduces the glass line to glass line dimensions to meet the depth requirements for many of the indicative apartment layouts. Building 1 has a commercial floor plate of 17.6m.</p> <p>The Chapter 4 Housing SEPP Report at Appendix E demonstrates that the reference scheme achieves high levels of compliance with key ADG controls, including solar access, natural ventilation and apartment dimensions. This means high levels of amenity are possible within the Concept building envelopes. Compliance with the ADG and the Sydney Olympic Park Master Plan 2030 will</p>

		<p>also be further explored during the detailed design phase. Therefore, minor elements of non-compliance of residential floorplate depths can be justified.</p> <p>Overshadowing:</p> <p>The Response to Submissions report (prepared by Sydney Olympic Park Authority, May 2022) addressed submissions made to the draft Sydney Olympic Park Master Plan 2030 (Interim Metro Review) relating to overshadowing impacts.</p> <p>Additional modelling was undertaken by Cox Architecture on behalf of Sydney Olympic Park Authority. In its conclusion in the DPHI Sydney Olympic Park Master Plan 2030 Interim Metro Review Finalisation Report - June 2022, DPHI states that:</p> <p>“The Department considers this an acceptable approach to take at this strategic planning stage, and notes that all future developments will be subject to site-specific design examination and assessment of overshadowing impacts... On assessment of this additional information, the Department considers that the future overshadowing potentially caused by the proposal [the Master Plan increase to 45 storey envelopes at Site 47] is minimal, and will have a limited, acceptable impact”.</p> <p>Further, an Amended Shadow Impact Analysis (see Appendix G) has been undertaken to analyse the overshadowing impact of the proposed OSD and ASD envelopes on potential indicative building envelopes at Sites 50 and 51 that would be consistent with the height controls in the Central River City SEPP and SOP Master Plan 2030 (Interim Metro Review).</p> <p>The results focus on the impacts from the proposed envelopes at Site 47 on sites 50 and 51 (rather than offer a proof of concept of the wider statutory and Master Plan building envelope height controls across the precinct).</p> <p>The results demonstrate impacts of the OSD and ASD envelopes are compliant with solar access guidelines for both existing properties and the potential future envelopes for Sites 50 and 51 shown in the Master Plan.</p> <p>The overshadowing analysis demonstrates that 87.5% of units at Site 50 and 70.2% of units at Site 51 could receive a minimum of 2 hours direct sunlight between 9am and 3pm on 21 June. Therefore, potential indicative compliant building envelopes on Sites 50 and 51 could achieve ADG Objective 4A-1 solar access objectives.</p> <p>Refer to Section 5.3 below and Appendix G for further analysis.</p>
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CoPC9	Community facilities: Any additional community space provided should have the capacity to operate as community space independently of the Metro station operational requirements	The options for location of community uses will be considered across the precinct as a whole and is subject to further discussion with Sydney Olympic Park Authority on the most appropriate location.
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4.2 Key stakeholder and community submissions

Table 4-14 summarises the issues raised in key stakeholder and community submissions and includes a response to the issues and references where these issues have been addressed in the detailed documentation as relevant. In summary, the key issues raised in public submissions include:

- Overshadowing impacts to the southern neighbours
- Concern regarding the proposed building height and density
- Support for the increased housing above the new metro station, which will reduce reliance on private vehicles
- Concerns about a lack of affordable/social housing provision within the proposed development
- Concerns that the proposal does not provide enough retail floor space to create a viable town centre.

Table 4-14 Response to public submissions

Issue raised	Sydney Metro response
Height	
<p>One submission did not support the proposed building height, as the submitter states it is not compatible with the scale of the buildings in the surrounding area.</p>	<p>The proposed building heights are consistent with the future vision for the Sydney Olympic Park area and are fully compliant with the amended planning controls under the SOP Master Plan 2030 (Interim Metro Review) and Central River City SEPP.</p> <p>Various building designs were considered. Following input from the SMWDAP, and in consultation with Sydney Olympic Park Authority, a design principle was adopted to place the tallest buildings along Figtree Drive, with lower scale buildings adjacent to the future Central Plaza created as part of the station.</p> <p>The SMWDAP also recommended that the height of Building 2 respond to the scale of the Abattoir and achieve a human scale around the town centre, noting the Sydney Olympic Park Authority height controls permit 45 storeys.</p> <p>Additionally, the maximum height of Building 1 was set to around 21 storeys above the station box to transition building heights west to Olympic Boulevard and to meet the needs of the commercial office market.</p> <p>In summary, the proposed building envelope heights fall within the planning controls under the Central River City SEPP, vision of the Sydney Olympic Park Master Plan 2030 (Interim Metro Review), are considerate of the surrounding context and suitable for the site.</p>
Traffic and Parking	
<p>A number of public submissions support the project as it will reduce the traffic by increasing public transport usage.</p>	<p>This support is noted, however it relates more to the metro station than the proposed OSD and ASD.</p>
Overshadowing	
<p>Major overshadowing impacts on Site 50 which will detrimentally impact the viability of a mixed use development in line with the Sydney Olympic Park Masterplan 2030 (Interim Metro Review) vision for the site, as is detailed in the following section of this submission.</p> <p>A sun access plan should be designed to minimise overshadowing to Site 50.</p>	<p>The Amended Shadow Impact Analysis (Appendix G) undertakes an analysis of the overshadowing impacts of the proposed OSD and ASD envelopes on existing surrounding properties and public spaces (during summer and winter solstice and spring and autumn equinox) at hourly intervals between 9am and 3pm.</p> <p>An additional assessment has been carried out of the overshadowing impact of the proposed OSD and ASD envelopes on potential indicative building envelopes at Sites 50 and 51 that are consistent with the height controls in the Central River City SEPP and Sydney Olympic Park Master Plan 2030 (Interim Metro Review).</p>

<p>Overshadowing impacts to 6 Figtree Drive: the proposal does not consider the overshadowing impacts of potential future development of the site and its ability to comply with the ADG. The reduction in development potential (residential) is in contravention of the SOP Master Plan – the design should be amended to reduce overshadowing and revised solar modelling done.</p>	<p>The results focus on the impacts from the proposed envelopes at Site 47 on sites 50 and 51 (rather than offer a wider proof of concept of the statutory and Master Plan building envelope controls across the precinct).</p> <p>The results demonstrate impacts of the OSD and ASD envelopes are compliant with solar access guidelines for both existing properties and the potential future envelopes for Sites 50 and 51 shown in the Master Plan.</p> <p>The overshadowing analysis demonstrates that 87.5% of units at Site 50 and 70.2% of units at Site 51 could receive a minimum of 2 hours direct sunlight between 9am and 3pm on 21 June. Therefore, potential indicative compliant building envelopes on Sites 50 and 51 could achieve ADG Objective 4A-1 solar access objectives.</p> <p>Refer to Section 5.3 below and Appendix G for further analysis.</p>
<p>Overshadowing and sun access planes will be an issue and have not been given enough consideration for surrounding residential areas</p>	
<p>Heights of the OSD should be increased to provide more housing within the precinct. There needs to be more uplift across the whole precinct.</p>	
<p>The height of the building will increase overshadowing.</p>	
<p>Public Transport</p>	
<p>Supports the proposal as it will create more efficient and reliable public transport from the CBD and Parramatta.</p>	<p>This support is noted, however it relates more to the proposed station and is not directly relevant to the proposed OSD and ASD.</p>
<p>Access</p>	
<p>The concept drawings have not taken into account vehicle access and servicing requirements for the undeveloped area of site 4B.</p> <p>The design (in term of levels, turning circles and pavement treatment) needs to take into account the current basement access to Site 4B as well as the adjacent loading dock. This loading dock is sized for the 10 storey commercial building. Allowance should be made for a larger dock that</p>	<p>The application site for the Concept SSDA (Site 47) does not extend northwards to adjoin or create an interface with Site 4B.</p> <p>The Stage 3 CSSI site boundary includes Precinct Street B (north), which lies between the proposed northern station services building and Site 4B. The construction access to Site 4B and future dedication of Precinct Street B will be included in agreements with Sydney Olympic Park Authority and also subject to Sydney Olympic Park Authority’s 2050 Master Plan review including Site 4B.</p> <p>The conditions of approval for the Stage 3 CSSI include the requirements, summarised as follows: E71: Station Design and Precinct Plans (SDPPs) must document how outcomes of consultation with landowners and businesses have been considered in the design</p>

<p>would cater for a larger, mixed use development as envisaged under the Sydney Olympic Park Authority Masterplan, especially if active retail / F&B uses is to be provided at ground level fronting the future 'Miluni West End' Plaza.</p>	<p>E111: Access to all properties must be maintained during the entirety of the works unless agreed in writing with the relevant landowner or occupier; and</p> <p>E112: Any property access physically affected by the CSSI must be reinstated to at least an equivalent standard, unless otherwise agreed by the landowner or occupier</p> <p>These requirements to maintain access to Site 4B will be included as part of the Construction Management Plan requirements during the Request for Tender phase as one of the key steps towards construction of the Stage 3 CSSI works.</p>
<p>Procedural issues</p>	
<p>Analysis of feasible alternatives were not explored in the EIS which is under clause 192 of the EP&A Regs.</p>	<p>An analysis of feasible alternatives was undertaken in Section 2.5 of the Concept SSDA EIS (refer to Table 4 of the EIS). To summarise, the following feasible alternatives were analysed:</p> <p><u>Do nothing:</u></p> <p>The 'Do Nothing' alternative would result in the existing buildings on Sydney Metro land being demolished and the new metro station being constructed as per the Stage 3 CSSI Application with no over station or adjacent station development.</p> <p>'Do Nothing' without any associated development would result in a poor placemaking outcome, lack of activation around the station and would pass up the opportunity to deliver a city shaping project.</p> <p><u>Alternative design:</u></p> <p>In 2020, Sydney Metro prepared a masterplan and investigated massing options for the precinct. Initially, the SSDA site was proposed to have a large podium, approximately 5 storeys in height, with two towers above with one being residential and the other commercial. Various arrangements and heights were tested for the towers.</p> <p>Early concept design development was undertaken in 2021 when Sydney Metro reviewed alternate options, including the configuration of three towers.</p> <p><u>Proposed design:</u></p> <p>It is considered that the concept proposal provides for a high quality outcome at the site. The proposed development presents a balanced and feasible option as it would:</p> <ul style="list-style-type: none"> • Establish the indicative gross floor area and land uses for the site • Recognise growth opportunities within Sydney Olympic Park and seek parameters to attract more businesses and residents in a well-connected location reducing reliance on private transport modes • Protect key view corridors from ground level to the town centre, heritage precinct, and aquatic centre

	<ul style="list-style-type: none"> • Encourage activated street frontages to increase the level of ground plane interaction and vibrancy • Capitalise on significant infrastructure investment • Enable the creation of approximately 372 construction jobs over eight years, in addition to 2,247 ongoing jobs directly and a further 1,636 jobs indirectly created during the operation of the development • Allow for approximately 316 new homes in close proximity to public transport and amenities.
No cohesion between the SOP Master Plan and this planning proposal. The PP should be incorporated into the Sydney Olympic Park Authority master plan.	<p>Following the commitment to the delivery of a Sydney Metro West Station within the Central Precinct, the Master Plan 2030 (2018 Review) was amended to facilitate the delivery of the station.</p> <p>The SOP Master Plan 2030 (Interim Metro Review) identified the required changes to planning and urban design controls in the existing Master Plan 2030 (2018 Review) to facilitate the delivery of Sydney Metro West.</p> <p>The Concept SSDA building envelopes are consistent with the SOP Master Plan 2030 (Interim Metro Review), including envelope height, FSR, setbacks and active frontages and relevant Central River City SEPP controls.</p>
Public benefit/ amenity	
The proposed development will increase public amenity.	Noted and accepted.
Housing supply	
Supports the provision of more housing – also specifically recommends an affordable/social housing provision of 30% to be mandated	<p>As part of the preparation of Detailed SSDAs, the future Applicant will clarify the quantity of affordable housing achievable within the development.</p> <p>For the Sydney Olympic Park Concept SSDA, Sydney Metro will commit to a minimum of 5% of new residential floorspace to be provided as affordable housing for a minimum of 10 years, or an equivalent monetary contribution to a community housing provider to provide affordable housing in the local area.</p> <p>This is in line with the target set out in the SOP Master Plan 2030 (Interim Metro Review). It is noted there is no affordable housing target stated in the Central River City SEPP.</p> <p>Sydney Metro will also consider and respond to the applicable NSW government policies relating to affordable and diverse housing through the procurement of development outcomes for the site. This may include consideration of strategies to optimise affordable and diverse housing outcomes across the Sydney Metro program.</p>

<p>More housing supply could be achieved by increasing building heights.</p>	<p>The proposed building heights are fully compliant with the SOP Master Plan 2030 (Interim Metro Review). The development proposes a substantial boost to housing supply in the precinct and would deliver approximately 316 dwellings at the site.</p>
<p>GFA distribution</p>	
<p>Not enough Retail GFA for 23,000 residents and 30,000 workers. Will not have a functioning town centre if retail space is only 1,760sqm</p>	<p>As outlined in the SOP Master Plan 2030 (Interim Metro Review), retail uses will be integrated throughout the development sites around the new metro station. The quantum of retail uses included in the Concept SSDA is only one portion of the retail uses which would be expected to come forward with other development proposals in the wider precinct – for example on sites 46 and 48.</p> <p>The northern station building (Site 40) is comprised of the northern station entry, retail and publicly accessible rooftop open space.</p>
<p>View Impact</p>	
<p>The height of the building will disrupt views.</p>	<p>The Visual Impact Assessment submitted with the EIS (Appendix R of the Concept SSDA) assessed potential visual impacts of the proposed development and found that the built forms proposed are not dissimilar in character, height or form to those within the surrounding visual context and the emerging context under the SOP Master Plan 2030 (Interim Metro Review).</p>
<p>Outside of the project scope</p>	
<ul style="list-style-type: none"> • Concerns about energy supply to the proposed development. • Ensure injury preventing materials are used in the new metro stations to increase public safety. • Recommends a metro station be built at Camelia as the distance between SOP metro station and Parramatta metro station is too big of a gap. 	<p>These submission comments are noted as being outside of the proposed scope of this Concept SSDA.</p>

5 Additional assessment and clarifications

This section provides a detailed summary of Sydney Metro's response to issues raised in submissions and agency advice. A submissions register is appended to this Submissions Report (Appendix A).

This section provides additional assessment of the proposal, including the refinement of GFA, and in response to the DPHI Request for Additional Information. In summary, the following specific matters were identified by DPHI in their letter, dated 6 February 2023, to be further addressed in the Submissions Report:

- Clarification of the project's response to advice provided by the SMWDAP
- Further clarifications/refinements to the submitted site-specific Design Guidelines
- Additional overshadowing impact analysis
- Further clarifications on the funding and timing on public domain works, infrastructure and development contributions
- Additional clarifications relating to traffic and parking modelling
- Clarify or confirm the provision of affordable housing for the proposal.

5.1 Design Excellence

5.1.1 Design Advisory Panel

Apart from one SMWDAP meeting which was devoted to a review of the Site-Specific Design Guidelines (SSDGs) for the Sydney Olympic Park Concept SSDA (held on 13 July 2022), other SMWDAP comments on the proposal informed the overall review of the Indicative Reference Scheme for the project, covering both the station design (under the CSSI) and the proposed development design (this Concept SSDA).

Note also when the SSDGs were presented to the SMWDAP, they had not yet been provided with a copy of the SOP Master Plan 2030 (Interim Metro Review) nor Appendix E of that document which identifies many of the controls that apply to the Concept SSDA.

Four DAP meetings were held during the evolution of the Concept SSDA building envelopes and Indicative Reference Scheme for the Sydney Olympic Park metro station site. A summary of advice received from the SMWDAP, and the relevant project response is provided at Appendix C.

Key areas of design advice relating to the Concept SSDA include:

1. Review scale of Building 1 OSD lobby to maximise pedestrian movement/minimise pinch point at station entry and near the Figtree Drive bus interchange
2. Bridges across the Promenade are not supported
3. Aspects that are supported include: The general structure of the scheme and how it provides a clear sense of arrival; and the retail strategy and how it can positively contribute to the life and experience of the precinct
4. Ensure cross-referencing is provided with relevant guidelines in the SOP Master Plan 2030 (Interim Metro Review), notably Appendix E on matters such as interface of buildings with public domain and activation
5. The SSDG should strengthen objectives behind the building envelopes to explain that this is to ensure variation and interest in skyline
6. Podium setbacks in the SSDG should be clarified generally and along Precinct Street B and increased where possible – informed by detailed design and further wind assessment
7. Ensure there is clear guidance and requirements for building/street interface, ground plane design and public/private interfaces (e.g. awning provision, awning heights, etc).

A presentation was also given to the SMWDAP on 3 May 2023 to present the updates to the SSDGs arising from previous DAP comments received. Some further amendments to the SSDG for Sydney

Olympic Park were recommended at that meeting, as summarised in Appendix C. These amendments are incorporated into the revised SSDG at Appendix D.

5.1.2 Design Excellence for Concept SSDAs

Sydney Metro has a long-standing commitment to design excellence as an outcome and has led the way in setting new benchmarks for delivery of excellence in design for major infrastructure projects. The Sydney Metro West Design Excellence Strategy (DEX Strategy) outlines Sydney Metro’s approach to deliver design excellence across the Sydney Metro West project. The strategy was approved by the Government Architect NSW in August 2022.

The integrated nature of designing for a Metro station, the OSD, ASD and precinct calls for embedding design excellence throughout the lifecycle of the design process. The DEX Strategy sets out how design excellence is considered from inception of ideas and concepts that define expectations, through design development and procurement to delivery.

The DEX Strategy is structured around three phases, as identified at Figure 5-1 (Figure 4 from the DEX Strategy).

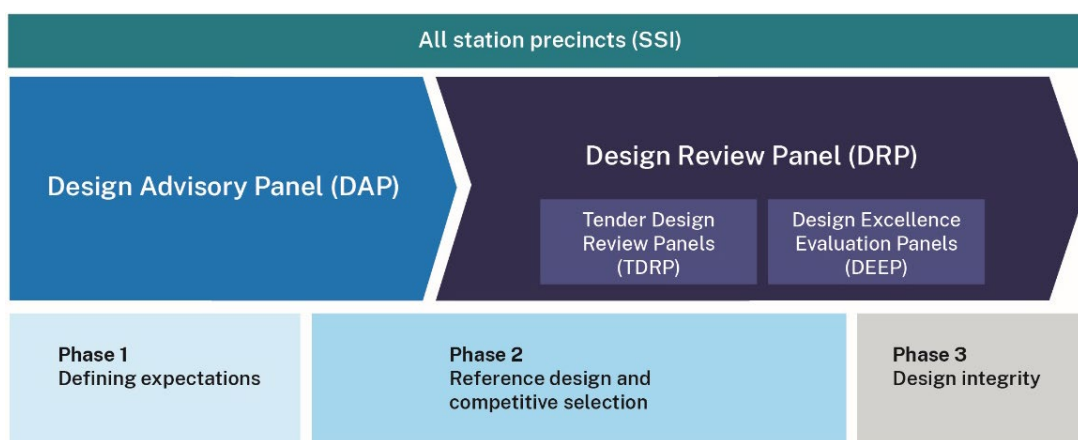


Figure 5-1 DEX Strategy Diagram

As part of Phase 1, Sydney Metro established a DAP to guide the concept design of the station, the station precinct and any integrated station development. It is during Phase 1 that the design approach for the Sydney Olympic Park Concept SSDA was developed.

The role of the DAP is to provide strategic design guidance, based on sketches and options presented at the early stages of design in an informal format. The responsibilities of the DAP include advising on key design elements such as place making, activation, heritage, urban design, streetscape, public domain, architecture and landscape architecture.

The DAP does not provide recommendations on whether the proposal will, or is capable, of achieving design excellence at the Concept SSDA stage. This occurs during formal procurement in Phase 2, as discussed below, during the Detailed SSDA stage.

5.1.3 Design Excellence for Detailed SSDAs

During Phase 2 (prior to commencement of procurement) and Phase 3, Sydney Metro establishes a Design Review Panel (DRP). During Phase 2, a Design Excellence Evaluation Panel (DEEP) is formed (a subset of the DRP) for Sydney Olympic Park to inform the tenderers’ preliminary Detailed SSDA design at the Tender Phase.

Clause 30(3), Appendix 4 of *State Environmental Planning Policy (Precincts—Central River City) 2021* (Central River City SEPP) states:

“Development consent must not be granted to the following development unless a design competition has been held in relation to the proposed development—

(a) the erection of a new building with a building height greater than 42 metres above ground level (existing),

(b) the erection of a new building identified as requiring a design competition in a master plan”.

Design competition is defined in clause 30(4), Appendix 4 as:

*“design competition means a competitive process conducted in accordance with procedures **approved by the Secretary** from time to time”.* (Emphasis added)

Although the Sydney Olympic Park Authority has a Design Excellence Policy which was approved by the Government Architect’s Office (under delegation from the Secretary) in February 2018, the SOP Master Plan 2030 (Interim Metro Review) notes at section 2.1 that:

“Development applications for Metro Sites, excluding Site 48, will be subject to the Sydney Metro West Design Excellence Strategy in place of requirements under SOPA’s Design Excellence policy”.

The SOP Master Plan 2030 (Interim Metro Review) clearly places the design excellence responsibility for Site 47 (and Site 40) under the DEX Strategy, which was endorsed by the NSW Government Architect (under delegation from the Planning Secretary).

The DEX Strategy incorporates and explains the ‘competitive process’. At section 6.1 it states that:

“At sites with statutory planning controls for design competitions for over station development, the DEEP will facilitate a competitive selection process to meet those requirements... For adjacent station development the design excellence provisions under the relevant EPI, including the competitive design process would continue to apply”

However, at Sydney Olympic Park, Clause 30(3), Appendix 4 of the Central River City SEPP does not distinguish between competitive processes for OSD and ASD. Therefore, the DEEP process will be used for both OSD and ASD. As a clarification from the Concept SSDA EIS, it is not intended for Buildings 2 and 3 to be assessed under Sydney Olympic Park Authority’s Design Excellence Policy.

At section 4.3 of the approved DEX Strategy it is stated that:

“The DEEP process conceptually aligns Sydney Metro with the role of competitive design processes in EPIs and ensures that Sydney Metro’s competitive tender selection benefits from expert, independent and objective design expertise and advice. The key difference is that there would be no winner of a design competition. Instead, the DEEP process ensures that each of the shortlisted design schemes is capable of achieving design excellence”.

Therefore, in this instance the SMW DEEP process as set out in the DEX Strategy will apply to all three proposed buildings on Site 47, addressing the competition requirements in Appendix 4 of the Central River City SEPP. The role of the DEEP in Phase 2 is to evaluate whether a scheme exhibits or is capable of exhibiting design excellence.

Once the contract is awarded Detailed SSDA(s) would be required for Buildings 1, 2 and 3, to be reviewed by the SMW DRP and assessed by DPHI.

Phase 3, which includes continued review by the DRP, ensures design integrity is achieved and demonstrated in the design and delivery of stations, precincts and development following contract award.

5.2 Design guidelines

Additional text and figures have been added to the revised site-specific Design Guidelines document (Appendix D) to:

- Refer to the requirements of the ADG, particularly with regard to building separation. (See Guidance no. 6 at page 18 of the Design Guidelines). In addition, new Figure 1.2.1 has been added to the revised Chapter 4 Housing SEPP Assessment Report at Appendix E of this Submissions Report to assess the compliance of the building envelope separation distances to ADG Objective 3F-1
- Respond to the relevant advice provided by SMWDAP (see Section 5.1.1 above and Appendix C to this Submissions Report). This includes new objectives and guidelines relating to Connecting with Country; clarifying ground floor plane public/private interface; placing less emphasis on the Indicative Reference Scheme in illustrative figures; indicating that façade indents, increased setbacks and awnings may be required to mitigate wind impacts; cross referencing minimum requirements for public spaces and interfaces from the SOP Master Plan 2030 (Interim Metro

Review) Appendix E; clarifying guidance for building setbacks; and revising guidance to improve pedestrian circulation space between the bus interchange at Figtree Drive and the Promenade

- Add reference to the Sydney Olympic Park Master Plan 2030 (Interim Metro Review) Appendix E, for example relating to lighting, street furniture and paving. In addition, to refer to tree canopy cover for Precinct Street A (the only public domain / open space area with tree planting within the scope of the Concept SSDA) as a Shared Street. Note that Stage 3 CSSI conditions of approval for the public domain works include requirements for landscaping.

5.3 Amenity impacts

The submissions of the owner of Site 50 state that the Concept SSDA (together with the building height controls on Site 48) will detrimentally impact the ability of the future mixed-use redevelopment of Site 50 to achieve sufficient levels of solar access, thereby impacting the commercial viability of the site.

Similarly, the submissions of the owner of Site 51 state the Concept SSDA documentation does not consider the shadow impact of the proposed development on compliant future building envelopes on Site 51 and surrounding sites and their ability to comply with the ADG. In addition, the submission states the proposed development would inhibit the development potential of Site 51 for residential uses.

The following is relevant to both these submissions made to the Concept SSDA.

1. Proposed building envelopes in the Concept SSDA are within the height and FSR controls for Site 47 on the Height of Buildings Map under the Central River City SEPP.
2. The proposed building envelopes are also within the height and FSR controls for Site 47 in the Sydney Olympic Park Master Plan 2030 (Interim Metro Review) as a DPHI-approved precinct planning strategy.
3. The impacts of the proposed Concept SSDA building envelopes on Sites 50 and 51 have been assessed with reference to the ADG and are acceptable.
4. Changes to the Sydney Olympic Park Master Plan 2030 (Interim Metro Review) were made to reflect the intended establishment of a mixed-use transit-oriented built form around the new Sydney Olympic Park metro station and public transport hub. Overshadowing diagrams and modelling were included in the Urban Design analysis prepared by Cox Architecture and form part of the Master Plan assessment package.
5. The owners of Site 50 made submissions to the proposed increase to 45 storey building envelope heights at Site 47 during the exhibition of the SOP Master Plan 2030 (Interim Metro Review). Concerns were raised that the proposed changes to the built form, particularly the proposed building heights, would create additional overshadowing impacts on surrounding properties.

Section 4.2 (Built Form and Urban Design) of the DPHI's Sydney Olympic Park Master Plan 2030 Interim Metro Review Finalisation Report - June 2022 addresses overshadowing impacts. It states that:

"In response to these submissions, the Department requested that SOPA provide additional analysis to demonstrate the impact of the proposed built form changes, including any additional overshadowing. As part of the Response to Submissions report, SOPA provided shadow diagrams at 9am, 12pm, and 3pm on the winter solstice (21 June) and the equinoxes (21 March and 21 September). It is noted that as the planning controls do not dictate specific building envelopes, the analysis used general building envelopes that were compliant with the planning controls, which represents one of a range of potential built form outcomes. The Department considers this an acceptable approach to take at this strategic planning stage, and notes that all future developments will be subject to site-specific design examination and assessment of overshadowing impacts."

Furthermore the Finalisation Report states:

"The modelling provided also assessed the proposal's impact on the ability of Site 50 – to the south of the proposal, on the opposite side of Figtree Drive – to deliver a residential development that complies with sun access requirements.

The modelling undertaken by Cox Architecture for SOPA's Response to Submissions tested a theoretical built form of 2 residential towers against Objective 4A-1 of the ADG, which requires that 'living rooms and private open spaces of at least 70% of apartments in a building receive a minimum of 2 hours direct sunlight at mid-winter'. The modelling found

that one tower achieved compliance, with 70.7% of apartments meeting the requirement, while the other did not, with 61.4% compliant.

The main area of difference between overshadowing on the towers is some additional overshadowing of the lower levels on the north-eastern side of the northern tower, which is considered reasonably likely to occur regardless of the changes made in this proposal [the Master Plan increase to 45 storey envelopes at Site 47]. Additionally, it is noted that this is an indicative built form only, and there is significant opportunity and flexibility available on the site to deliver a built form which achieves compliance with this and other requirements of the Master Plan and ADG.

On assessment of this additional information, the Department considers that the future overshadowing potentially caused by the proposal is minimal, and will have a limited, acceptable impact”.

Therefore, DPHI has stated it is satisfied with regard to potential future overshadowing of Site 50 from 45 storey envelopes at Site 47 through the preparation of the Sydney Olympic Park Master Plan 2030 (Interim Metro Review).

With regard to Site 51, it is noted that no issues were raised by the DPHI in the Finalisation Report regarding the potential overshadowing impacts of the envelopes at Site 47 (on its own or cumulatively with other sites) on Site 51.

It is noted that under the Sydney Olympic Park Master Plan 2030 (Interim Metro Review) Site 47 has a maximum building height of 45 storeys. The proposed building envelopes in the Concept SSDA are 45, 27 and 21 storeys and therefore offer the opportunity for a lower degree of overshadowing on Site 50 and Site 51 than has been accepted (as above) by DPHI.

Notwithstanding the above, DPHI has requested additional overshadowing impact analysis be provided to test the Concept SSDA proposal's impacts to adjoining and surrounding properties.

An additional overshadowing impact assessment is provided as part of the updated Shadow Impact Analysis at Appendix G. This assesses the impact of the Concept SSDA Building Envelopes (at Appendix H) on potential indicative residential building envelopes at Sites 50 and 51 that are consistent with the height controls in the Central River City SEPP and Sydney Olympic Park Master Plan 2030 (Interim Metro Review). The solar access diagrams are provided at Figures 5.2 – 5.6 of Appendix G.

Site 46 and Site 48, owned by Sydney Metro, have not been considered as part of a cumulative assessment as they do not meet the criteria established in Table 2 of the DPHI's *Cumulative Impact Assessment Guidelines for State Significant Projects*. The timing for development applications (DAs) and the subsequent development of these sites is unknown.

The overshadowing analysis demonstrates that 87.5% of units at Site 50 and 70.2% of units at Site 51 could receive a minimum of 2 hours direct sunlight between 9am and 3pm on 21 June. Therefore, potential indicative compliant building envelopes on Sites 50 and 51 could achieve ADG Objective 4A-1 solar access objectives. These are indicative built forms and there is flexibility for other alternative building forms, layouts and mix of units to enable improvement to be made to meet and further exceed ADG solar access objectives.

5.4 Infrastructure and public domain delivery

The Detailed SSDA(s) would be subject to the Sydney Olympic Park Local Infrastructure Contributions Framework (ICF). A determination of this Concept SSDA will not trigger a contribution as the determination does not authorise the carrying out of development without further consent. The value of the contributions would be determined as part of the future Detailed SSDA(s). At that stage, the precise floor space and specific details would be known. Part of Precinct Street A and the laneway between Building 2 and 3 is the only public domain space included in the Concept SSDA boundary.

Sydney Metro is currently negotiating a development agreement with Sydney Olympic Park Authority for public domain works being delivered as part of the Stage 3 CSSI Approval and as nominated items in the SOP ICF including:

- Miluni West
- Station Plaza/s
- Miluni East

- Central Park (part located on Sydney Metro land)
- Precinct Street B (North) and (South)
- Nominated transport access and intersection upgrades.

It is anticipated that the public domain including Central Park and nominated precinct streets will be dedicated to Sydney Olympic Park Authority on completion of works.

The two parts of Precinct Street B are to be delivered by Sydney Metro as per the delivery of the station works (Stage 3 CSSI works). Other public domain works to be staged and delivered with the station include Miluni Plaza/s and Central Park as per the Stage 3 CSSI – with the conditions of the Stage 3 CSSI Approval controlling this.

Precinct Street A is partly within the Concept SSDA boundary. It is included as a Sydney Olympic Park Authority ICF-funded street on land which is to be dedicated to Sydney Olympic Park Authority for public purposes (as stated in the Sydney Olympic Park Authority ICF, 2017).

The street is the main access point to the basement car park between Buildings 2 and 3, but also sits between Sydney Olympic Park Authority Master Plan sites 46 and 47, and therefore will also be influenced by Sydney Olympic Park Authority 2050 Master Plan outcomes for Site 46. Therefore, whilst delivery (through the ICF) is envisaged by Sydney Olympic Park Authority, the Sydney Metro and the station and OSD/ASD developer may seek to negotiate a Voluntary Planning Agreement with Sydney Olympic Park Authority in relation to delivery of part of Precinct Street A, to ensure basement access provision.

The final design of Precinct Street A will be determined through the Detailed SSDA and in discussion with Sydney Olympic Park Authority, including to specify the details of SSDA public domain and Precinct Street A delivery staging.

5.5 Services and utilities

While technically the demand for utilities may increase to accommodate the additional 960m² of GFA from that in the originally lodged Concept SSDA, this increase in utilities and servicing demand will likely be negligible. Given the site's location there is anticipated to be sufficient capacity in infrastructure and all available services to support this minor increase in GFA.

Further, the services and utilities demands from the exact GFA proposed to be constructed on the site will need to be further assessed in the future Detailed SSDA(s).

The minor increase in the maximum GFA proposed for the site is not expected to cause any significant additional impacts compared to that assessed in the EIS submitted with the Concept SSDA.

5.6 Traffic and parking

An Addendum Transport and Access Report has been prepared (Appendix K) to address the transport-related issues raised in the DPHI Request for Additional Information letter. The following sections provide a high-level response to the key issues raised by DPHI.

Pedestrian movement assumptions

The pedestrian counts were collected in March 2021 and were not reduced to factor any irregularities due to Covid-19. This is because the recorded pedestrian movements were low (in some cases single digit numbers) and so adjustments to account for Covid-19 would have had a negligible impact on the total recorded movements. In contrast, the vehicle traffic counts were adjusted due to Covid-19 as the travel by vehicle is the main mode of transport to and from the area. Therefore, the numbers recorded for vehicle traffic counts were significantly higher than for pedestrian movements.

Traffic growth rates

The traffic growth factors used to extrapolate the 2036 future flows were derived from Public Transport Projects Model (PTPM) strategic transport model outputs, provided by TfNSW. The cumulative growth rate over 14 years in the SOP Station precinct was 1.07.

The PTPM 2036 scenario model runs used are consistent with those used in Technical Paper 1 – Operational Transport of the Sydney Metro West Environmental Impact Statement (EIS) and are therefore appropriate for this Concept SSDA.

It is also noted that the additional 960m² of GFA (+1.4% increase in GFA) would have a minor impact to the outputs and findings of the transport assessment. It is anticipated that the changes to overall transport impacts of the development arising from this minor GFA increase would be imperceptible, and likely within normal daily variations in movement. For this reason, no additional mitigation measures are required.

Provision and allocation of parking and loading

The provision, timing and allocation of accessible parking, car share and motorcycle parking will be further investigated and determined in the detailed design phases as part of the preparation of the Detailed SSDA(s).

It is noted that the Sydney Olympic Park Master Plan 2030 (Interim Metro Review) states that no less than 2% of parking spaces should be accessible. The Indicative Reference Scheme includes provision for 2% of accessible parking spaces, which will be confirmed in the future Detailed SSDA(s). The Sydney Olympic Park Master Plan 2030 (Interim Metro Review) does not specify requirements for car sharing or motorcycle parking, however it is anticipated that the future Detailed SSDA(s) will benchmark using other relevant policies.

The Indicative Reference scheme includes provision for loading facilities for service vehicles. Precinct Street A would serve as residential, retail and commercial parking, servicing, and loading access for Buildings 2 and 3. Precinct Street B (south) would serve as a street servicing the future metro station and the proposed Building 1 OSD. Loading dock requirements, facilities and management at both buildings are subject to detailed design and will be explored further in the Detailed SSDA(s).

Mitigation measures to address vehicle-cyclist interface

The Indicative Reference scheme includes a dedicated lift accessible externally from Precinct Street B to the Building 1 bicycle parking and end of trip facilities (EOTF). Ground floor cycle parking for users of the metro station in will be provided as part of the Stage 3 CSSI Approval. For Building 2 and 3 there is also a dedicated lift from the eastern elevation off Precinct Street A to provide access to the basement cycle parking and EOTF. These access points to the cycle parking areas are labelled on the Indicative Reference scheme Ground Floor Plans at Appendix I.

The Detailed SSDA would demonstrate a design for safe cycle parking access and preparation of a cycle access management plan, including signage, to establish a preferred safe access route and discourage use of loading dock and vehicular access ramps by cyclists.

5.7 Stormwater and flooding

An Addendum to the Preliminary Integrated Water Management Plan assessment report (Appendix L) and an Addendum to the Flooding Assessment Report (Appendix N) have been prepared to address the NSW Environment and Heritage (EH) comments.

In summary, the Addendum to the Preliminary Integrated Water Management Plan report (Appendix L) outlines that Sydney Olympic Park Authority has clarified that whilst there is expected to be a hydraulic impact on the Northern Water Feature arising from the Concept SSDA proposal, this is not expected to be significant. However, Sydney Olympic Park Authority has requested that stormwater design at the Detailed SSDA stage:

- Further explores options to minimise stormwater flow to the Northern Water Feature; and
- Complies with Sydney Olympic Park Authority's Stormwater Management and WSUD Policy.

This will be further discussed with Sydney Olympic Park Authority during the detailed design stage for the Detailed SSDA(s).

EH also commented on access to the OSD and ASD during flood events. As outlined in the Addendum to the Flooding Assessment report (Appendix N), in the PMF event Figtree Drive at the intersection with Precinct Street A experiences hazard category H1 with flood depths of up to 0.31m. Given the maximum flood depths are at the limiting still water threshold for this hazard category, it is noted that hazard category H2 is not considered safe for small vehicles. Consequently, EH advised that horizontal evacuation from the precinct to Figtree Drive via Precinct Street A may not be safe in all circumstances.

On that basis and in the context of the current design, it is noted that other options exist for evacuation to address this concern, including:

- Evacuation by foot through the Promenade and onto Figtree Drive (H1 category areas)

- Evacuation by foot through the Sydney Olympic Park metro station public areas onto Precinct Street B to access Figtree Drive (H1 category areas)
- Sheltering in place within an over station or adjacent station development.

This matter would be considered further by the Detailed SSDA(s).

Whilst not a matter for this application, it is noted that the conditions of approval for the Stage 3 CSSI require the development of operational emergency management plans for flooding. Consequently, it is expected that those arrangements would consider relevant matters such as the preferred evacuation arrangements for the metro station. This potentially presents further option(s) which may be considered by the Detailed SSDA.

5.8 Water quality

An Addendum to the Preliminary Integrated Water Management Plan has been prepared (Appendix L) to address NSW Environment and Heritage and Sydney Olympic Park Authority comments on water quality.

Consultation was undertaken by Sydney Metro with Sydney Olympic Park Authority on 14 June 2023 to confirm proposed stormwater system and outlet points. During consultation, Sydney Olympic Park Authority confirmed that while the catchment area to the Northern Water Feature (NWF) will increase, the increase is not significant. Sydney Olympic Park Authority recommended that the aquatic ecology and threatened species impact should be mitigated with the exploration of further stormwater design at the Detailed SSDA stage to minimise increases to stormwater flow to NWF. This has been reflected in the Revised Mitigation Measures specified at Appendix B.

A letter from Sydney Olympic Park Authority confirming this approach is appended to the Preliminary Integrated Water Management Plan at Appendix L.

The request by Sydney Olympic Park Authority for urban runoff data and evapotranspiration data to be reviewed and updated has been undertaken in accordance with the Sydney Olympic Park MUSIC Modelling Guideline. The water quality data adopted in the updated MUSIC modelling is based on the current City of Parramatta Council water quality data which consists numerous data ranging from 1984 to 2007.

Additional water quality devices and strategies have been proposed to ensure the compliance of the stormwater strategy, including the following additional measures:

- 2x stormwater filter cartridges
- 96m² of rain gardens/tree pits
- 7 Oceanguard (gully pit inserts).

As outlined in Table 4-3 of Appendix L, the proposed working treatment train satisfies Sydney Olympic Park Authority baseline pollution reduction targets for stormwater harvesting catchment. Further design refinement at future stages of design of the proposal would ensure that the stormwater management system is comprehensively assessed and adequately addressed in a future Detailed SSDA.

5.9 Waste management

The additional 960m² of GFA will generate a minor amount of additional operational waste from the development from that assessed in the Concept SSDA EIS.

The size requirement for bin storage areas for waste and recycling is a function of a number of variables, notably GFA of each land use, compaction rates and frequency of collections.

Given the scale of the OSD and ASD, and that an Indicative Reference Scheme is only provided at this stage, it is anticipated that adequate waste and recycling storage can readily be accommodated in the future detailed design. As such, the minor increase in the maximum GFA proposed for the site is not expected to cause any significant additional impacts in loading or waste management compared to that assessed in the EIS submitted with the Concept SSDA.

The waste storage rooms shown on the Indicative Reference Scheme are indicative only, and further detail will be provided and assessed as part of the future Detailed SSDA(s) when exact GFA proposed to be constructed on the site is more certain.

Future detailed design should be generally consistent with the principles stated in the Concept SSDA EIS Appendix AA – Waste Management Plan.

As outlined in the site-specific Design Guidelines, waste storage areas and waste management on the site should relate to the GFA and mix of uses and, as a minimum, comply with the City of Parramatta Waste Management Guidelines for New Development Applications. A detailed waste management plan should be submitted with future Detailed SSDA(s) demonstrating how the requirements have been addressed in the final building designs.

5.10 Contamination

The Concept SSDA does not enable any physical construction works, since Detailed SSDA(s) are required for this. Appendix Z (Contamination Report) of the Concept SSDA EIS identifies landfills in the vicinity of the site as potential contamination sources to local groundwater. Assessing the impact from each individual contaminant is outside of the scope for a contamination assessment for the Concept SSDA and is not possible to assess without further building works and detail regarding building design.

The nearest potential leachate source is approximately 200m hydraulically down gradient under natural flow conditions. Construction is expected to alter the flow regime, which could see groundwater contaminated by leachate migrating towards the site.

The potential contamination identified in Appendix Z will be further considered during design for the Detailed SSDA(s) and subsequent construction phase. The site will be made suitable for its proposed use following the completion of remedial works (if required).

5.11 Affordable housing

For the Sydney Olympic Park Concept SSDA, Sydney Metro will commit to a minimum of 5% of new residential floorspace to be provided as affordable housing for a minimum of 10 years, or an equivalent monetary contribution to a community housing provider to provide affordable housing in the local area.

This is in line with the target set out in the SOP Master Plan 2030 (Interim Metro Review). It is noted there is no affordable housing target stated in the Central River City SEPP. As part of the preparation of detailed SSDAs, the future Applicant will clarify the final quantity of affordable housing achievable within the development.

Sydney Metro will also consider and respond to the applicable NSW government policies relating to affordable and diverse housing through the procurement of development outcomes for the site in the Detailed SSDA. This may include consideration of strategies to optimise affordable and diverse housing outcomes across the Sydney Metro program.

6 Updated proposal justification

Sydney Metro lodged a Concept SSDA for the Sydney Olympic Park Metro Station over and adjacent station development.

DPHI issued a letter dated 16 December 2022 requesting a response to the submissions and advice received from the public and government agencies during the exhibition of the EIS. This Submissions Report has been prepared to satisfy the provisions of section 59 of the EP&A Regulation 2021. Each of the submissions and agency advice received during the public exhibition period have been collated, analysed and addressed in this Submissions Report.

Sydney Metro has proposed a minor refinement and clarifications since public exhibition and in response to the submissions made, agency advice received and SMWDAP advice. The description of the proposal has also been amended to reflect the refinement arising.

Section 192(f) of the EP&A Regulation 2021 requires consideration of the principles of ecologically sustainable development (ESD). As outlined in the EIS, the proposal addresses the principles of ESD (under s193 of the EP&A Regulation 2021), summarised as follows:

- **Precautionary principle:** Proactive measures to prevent environmental degradation will be included within the design, construction, and operation phases of the proposed development.
- **Intergenerational equity:** The proposed development would maintain the health, diversity, and productivity of the environment for future generations by minimising the consumption of energy, water and waste by targeting the ESD targets.
- **Conservation of biological diversity and ecological integrity:** The proposed development is considered highly unlikely to have significant biodiversity impacts as the development is limited to highly modified areas, containing planted native and exotic vegetation only. Biological diversity will be promoted through the proposed landscape strategy and planting.
- **Improved valuation, pricing and incentive mechanisms:** During construction, the Environmental Management System and Environmental Management Plan, prepared by the main contractor, will demonstrate a formalised systematic and methodical approach to planning, implementing and auditing for environmental management. During operation, environmental performance targets would be set and verified.

In line with the EIS, no adverse environmental, social or economic impacts have been identified as a result of the proposed design refinements. Potential environmental impacts will be managed through mitigation measures for the design, construction and operational phases. As such, the proposed development is considered to be justified as a whole, incorporating relevant issues raised in the submissions and advice, for the following reasons:

- The site is zoned B4 Mixed Use under the Central River City SEPP, where residential, commercial, and retail uses are permitted with consent. The proposed Concept SSDA is consistent with the zone objectives and will ensure Sydney Olympic Park becomes an active and vibrant town centre in an accessible location, maximising public transport patronage and encouraging walking and cycling.
- The proposed development is consistent with the strategic planning objectives for the site and supports the Government's investment in public transport infrastructure and the delivery of well-connected place focused communities.
- The proposed development would support the growth of Sydney Olympic Park as a key planned employment and housing growth centre.
- The proposed development supports the '30-minute city' concept of the Central River City.
- The proposed development would create a vibrant precinct that is well connected to transport and provides opportunities for place-based design and transit-orientated development.
- The proposed building envelopes positively respond to the site conditions and surrounding local context and are consistent with the SOP Master Plan 2030 (Interim Metro Review).
- Subject to the various mitigation measures recommended by the specialist consultants, the approval would not have significant impacts on adjoining properties or public domain, including in terms of traffic, acoustic and environmental impacts.

- During construction, it is expected that approximately 372 jobs would be generated over eight years, in addition to 2,247 ongoing jobs directly and a further 1,636 jobs indirectly created during the operation of the development.
- Overall, the proposed development is in the public interest. The proposal would contribute to the provision of a 30-minute Central City, co-locating housing and employment uses at a site which directly benefits from and will enhance very good access to services, employment and transport.

Appendix A – Submissions register

Appendix B – Updated mitigation measures

Appendix C – Summary schedule of SMWDAP advice to Concept SSD design, project responses

Appendix D – Amended Site-Specific Design Guidelines

Appendix E – Amended Chapter 4 Housing SEPP Report

Appendix F – Amended Built Form and Urban Design Report

Appendix G – Amended Shadow Impact Assessment

Appendix H – Updated Building Envelope Plans

Appendix I – Updated Indicative Reference Scheme

Appendix J – Updated Demarcation Plans

Appendix K – Addendum to Traffic and Access Report

Appendix L – Addendum to Preliminary Integrated Water Management Report

Appendix M – Addendum to Utilities and Services report

Appendix N – Addendum to Flooding Report

Contact us

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