

# Submissions Report

## Parramatta Over and Adjacent Station Development

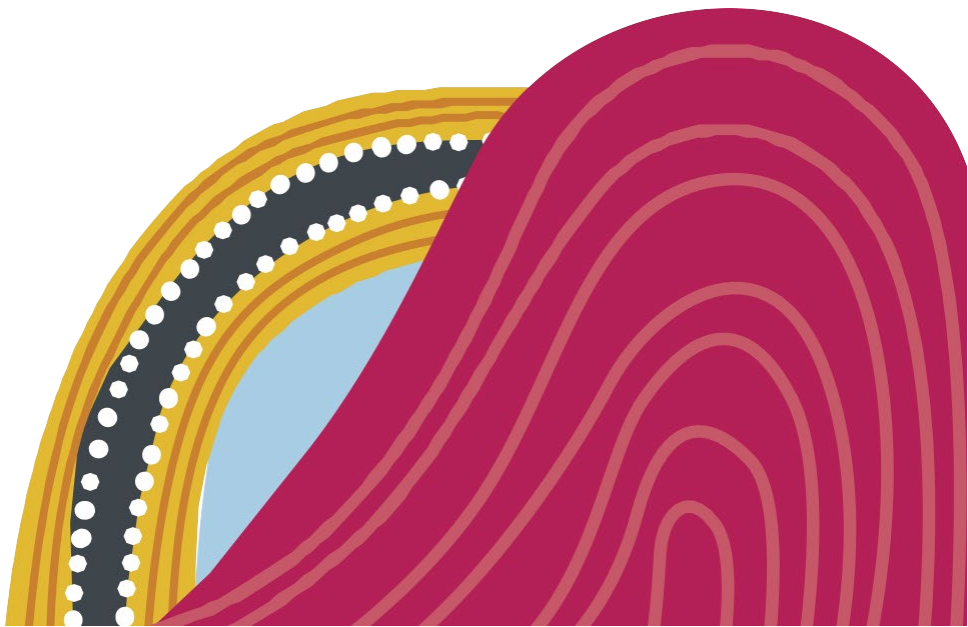
November 2024

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## 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.



# **Parramatta Over and Adjacent Station Development**

Submissions Report

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<b>Author:</b>	Andrew Duggan, Director, Planning – BA, MURP, LLB, MPIA, GAICD Jim Murray, Associate Director, Planning – BA, MURP Yousheng Li, Senior Urbanist, Planning – BCPlan Hons I Lachlan Jones, Urbanist, Planning – BCPlan Hons
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# Appendices

- Appendix A Submissions register
- Appendix B Updated mitigation measures
- Appendix C Summary of Sydney Metro West Design Advisory Panel feedback
- Appendix D Updated Building Envelope Drawings
- Appendix E Addendum Built Form and Urban Design Report
- Appendix F Parramatta Over and Adjacent Station Development Design Guidelines
- Appendix G Addendum SEPP (Housing) Compliance Report
- Appendix H Addendum Solar Access and Overshadowing Report
- Appendix I Updated Indicative Reference Scheme
- Appendix J Updated Delineation Drawings
- Appendix K Addendum Transport and Access Report
- Appendix L Addendum Flooding Report
- Appendix M Addendum Historic Heritage Impact Assessment
- Appendix N Addendum Visual Impact Assessment
- Appendix O Addendum Pedestrian Wind Assessment
- Appendix P Addendum Integrated Water Management Plan
- Appendix Q Addendum Utilities and Infrastructure Report
- Appendix R Demarcation Drawings - Additional GFA Study

# 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 program of works includes:

- Sydney Metro North West– opened in May 2019
- Sydney Metro City & Southwest – Chatswood to Sydenham opened in August 2024 and Sydenham to Bankstown currently under construction with services to begin in 2025
- 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 0-1.

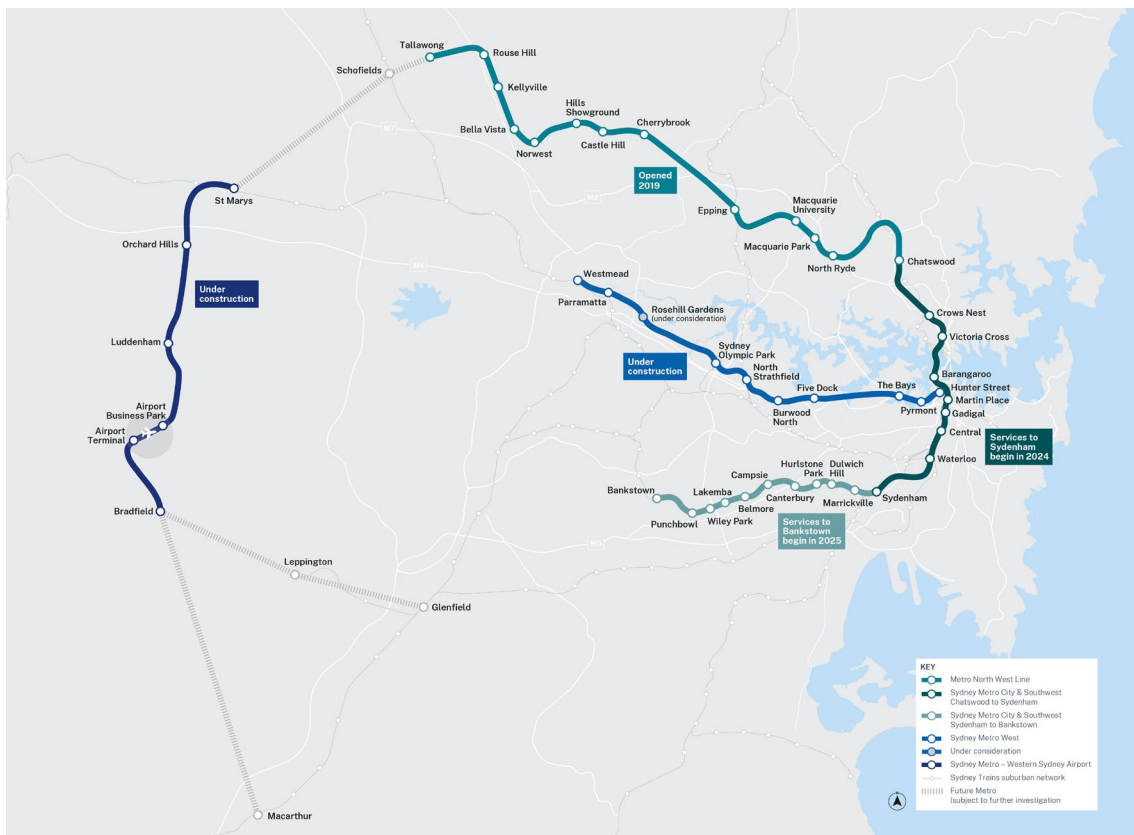
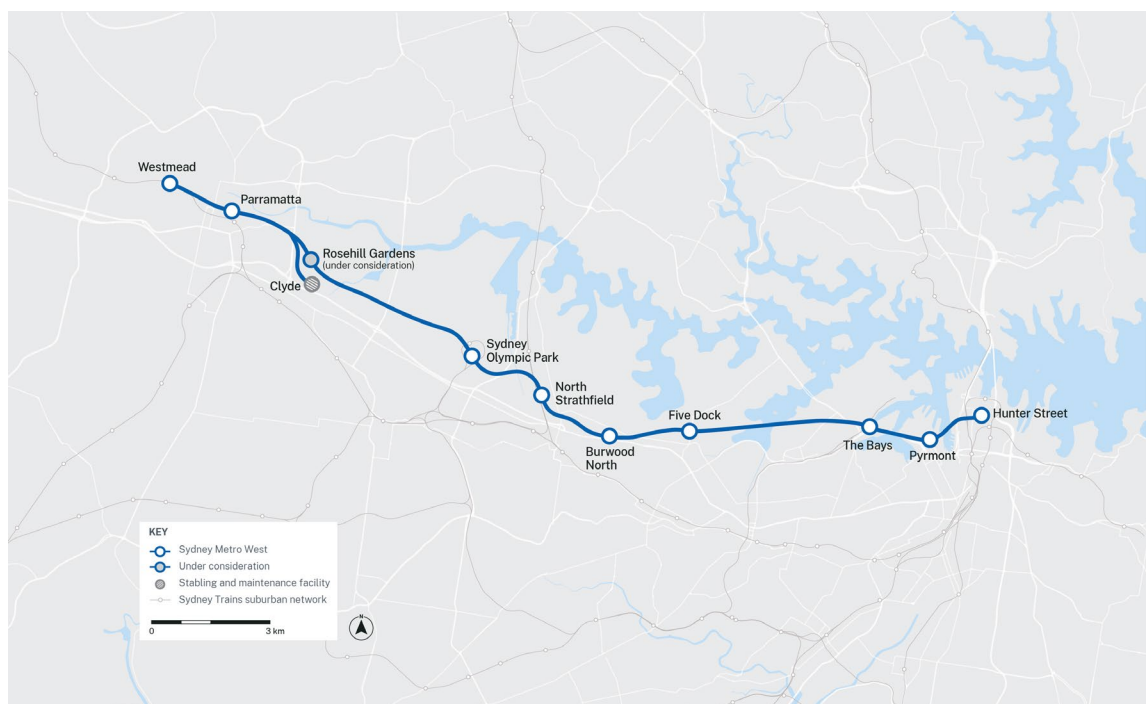


Figure 0-1 Sydney Metro network map

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 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 0-2 Sydney Metro West alignment map**



Sydney Metro West has been approved as staged critical State Significant Infrastructure (CSSI) under section 5.19 of the *Environmental Planning and Assessment Act 1979* (EP&A Act) and comprises the following:

- 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), approved on 11 March 2021;
- all major civil construction and enabling works between The Bays and the Sydney CBD, including demolition, tunnelling, and station excavation for new metro station associated with the Sydney Metro West railway line (Stage 2 CSSI Approval), approved on 24 August 2022; and
- 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), approved on 25 January 2023.

## **Integrated station and precinct development**

The Stage 3 CSSI approval for Sydney Metro West project includes 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.

Metro is making provision for over station and/or adjacent station development 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 the Concept State Significant Development Application (SSDA) for over station development (OSD) and adjacent station development (ASD) at Parramatta metro station. The EIS was prepared by Sydney Metro and submitted to the Department of Planning, Housing and Infrastructure (DPHI) (formerly the Department of Planning and Environment), 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. It seeks consent at a conceptual level for the proposed land uses, maximum building envelopes, maximum building heights, maximum Gross Floor Area (GFA), and maximum car parking rates. Specifically, the refined Concept SSDA seeks consent for a maximum GFA of 176,360m<sup>2</sup>, a maximum of 451 car parking spaces, the adaptive reuse of the existing Kia Ora and George Street Shops heritage items, and four building envelopes above and adjacent to the Parramatta metro station, described as follows:

- Building A is an approximate 38 storey (RL 172.7m) commercial and retail building

- Building B is an approximate 30 storey (RL 130.0m) mixed use building with commercial and retail uses up to Level 6 with residential accommodation above
- Building C is an approximate 26 storey (RL 135.5m) commercial and retail building
- Building D is an approximate 24 storey (RL 127.4m) commercial and retail building

## Purpose of this report

This Submissions Report has been prepared to address the matters raised by government agencies, the City of Parramatta Council (Council) and in public submissions during the public exhibition of the Concept SSDA.

The Concept SSDA was lodged with the DPHI on 10 November 2022 as State Significant Development specified in Schedule 1, Clause 19 of *State Environmental Planning Policy (Planning Systems) 2021*.

DPHI issued a letter to Sydney Metro on 16 December 2022 requesting a response to issues raised during the public exhibition of the application. The DPHI also issued a further Request for Additional Information on 6 February 2023, which identified the following matters:

- clarify the proposed Floor Space Ratio having regard to clause 4.6(8)(ca) of the Parramatta Local Environmental Plan 2011 (PLEP 2011)
- address amenity matters including compliance with the Apartment Design Guide and impact on adjoining sites (198-216 Church Street and 38-46 Macquarie Street), cumulative shadow impact to surrounding schools, and visual impact from schools
- clarify the project's response to advice provided by the Sydney Metro West Design Advisory Panel (DAP) and seek further advice from DAP on whether the proposal can achieve Design Excellence in accordance with clause 7.11 of the PLEP 2011
- review and revise the Design Guidelines to support the objectives and be consistent with the Apartment Design Guide, respond to advice from DAP, and respond to Council's advice
- address traffic and parking matters including clarity if pedestrian counts factored in reductions of movements from Covid-19 and confirm detail in regard to bicycle parking and car-share motorcycle parking
- address matters in relation to public domain and integration including clarification of the staging and delivery of public works, and consult with Council in relation to key issues raised by Council in relation to a whole precinct approach to public domain and street connectivity, alignment and site access
- address other issues including updating of documentation to include dimensions and clarification of dimension discrepancy, provide recommendation in the Contamination Report for future Detailed SSDA(s), clarify the provision of affordable housing, and provide updated stormwater and flooding modelling to address inconsistencies.

This Submissions Report outlines the proposed refinements to the Concept SSDA proposal and responds to all concerns raised within submissions and provides a response to the Request for additional information issued by the DPHI.

## Overview of submissions

The Concept SDDA was on public exhibition from 16 November 2022 to 13 December 2022. A total of 19 submissions were received which included five submissions made by business organisations, 13 from members of the community, and one from City of Parramatta Council. Advice was also received from 10 government agencies and authorities.

A submission was received from City of Parramatta Council which included comments in relation to the public domain including the Civic Link and new Horwood Place, design excellence, proposed Clause 4.6 Variation, cycle and pedestrian access, flooding and stormwater, integrated water management plan, and traffic and vehicles access.

Advice from Transport for NSW (TfNSW) comprised general comments in relation to the traffic model used and the proposed east-west link. It also included suggested conditions of consent in relation to the Parramatta Light Rail, green travel plan, construction pedestrian and traffic management plan, and construction zone and access from Macquarie Street.

Advice from Sydney Water requested further consideration is given to water servicing and water servicing and recycled water servicing for the proposed development.

Advice from the NSW Department of Climate Change, Energy, Environment and Water (DCCEEW) – Biodiversity, Conservation and Science (BCS) (formerly Department of Planning and Environment – Biodiversity and Conservation) included comments relating flood risk management in regard to the flooding modelling, use of flood barriers for the basement, and flood emergency management.

Advice from the NSW DCCEEW – Heritage NSW (formerly Department of Planning and Environment – Heritage NSW) include the support with the management recommendations in relation to Aboriginal Cultural Heritage. It also provided advice in relation to historical archaeology and built heritage including the potential impact to the various heritage buildings on and surrounding the site.

Advice from the NSW DCCEEW – Water Group (formerly Department of Planning and Environment – Water Group) provided no additional requirements but flagged the Applicant will need to ensure the groundwater inflows associated with construction and operation are accounted for by a Water Access Licence where the annual volumes exceed 3ML in the future.

Advice from Schools Infrastructure NSW (SINSW) provided comments in relation potential overshadowing and visual impacts to Arthur Phillip High School and Parramatta Public School to the south-west of the site.

Sydney Metro advised that the Concept SDDA will not have unacceptable impacts to railway infrastructure beneath it, having regard to the matters set out in the *State Environmental Planning Policy (Transport and Infrastructure) 2021* (Transport and Infrastructure SEPP and provided no additional comments.

Fire and Rescue NSW, NSW Environmental Protection Authority (EPA) and Ausgrid all provided no additional comments or assessment requirements.

A total of five submissions were received from organisations. These included surrounding landowners (Mirvac and Dehsabzi Enterprises Pty Ltd), industry groups (Urban Taskforce and Western Sydney Leadership Dialogue), and a service infrastructure provider (Endeavour Energy). In summary, the following issues were raised by organisations:

- Business case
- Design Excellence

- Tower separation
- Heritage
- Impact on surrounding site
- Land use zoning
- Social and affordable housing.

In addition, a total of 13 public submissions were received from neighbouring properties, residents and businesses within the community. A total of 5 submissions were in objection to the proposal, 3 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:

- Bulk and scale
- Construction impacts
- CPTED
- Design with Country
- Economic impacts
- Environmental amenity
- ESD
- Green space and public domain
- Heritage
- Impact on surrounding sites
- Olympic Park metro station
- Parramatta metro station
- Public art
- Social and affordable housing.

This Submissions Report provides a response to all advice and submissions within Section 4.

## **Actions taken during and since exhibition**

Since lodgement of the Concept SSDA, Sydney Metro further consulted with key stakeholders, undertook community information sessions, virtual community engagement, and provided additional resources and information to the community during the exhibition of the Concept SSDA. Sydney Metro has also undertaken further consultation with the DPHI, City of Parramatta Council, TfNSW and the Heritage Working Group (which includes Heritage NSW) as detailed below.

During the exhibition period Sydney Metro held three community information sessions where displays and information about the EIS was available. The information sessions were held on the following dates:

- Monday 21 November 2022, 11am – 2pm at Club Parramatta, 2 Macquarie Street, Parramatta
- Monday 21 November 2022, 3pm - 7pm at Club Parramatta, 2 Macquarie Street, Parramatta
- Wednesday 23 November 2022, 10am – 2pm at Parramatta Farmers Market

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

Since the Concept SSDA was publicly exhibited, Sydney Metro further consulted with the DPHI, City of Parramatta Council, TfNSW and the Heritage Working Group to discuss the issues raised within their submissions. This is summarised below:

- A meeting with the DPHI on 10 July 2024 to provide an overview of the Submissions Report and regular meetings to discuss any matters relating to the Concept SSDA and Submissions Report
- The following meetings were held with Council:
- 21 November 2022 – Discussions with Council, regarding the status of SSDA
- 15 December 2022 – 1st design workshop on Civic Link and Horwood Place
- 13 February 2023 – 2nd design workshop on Civic Link and Horwood Place
- 1 March 2023 – 3rd design workshop on Civic Link and Horwood Place
- 12 October 2023 – Meeting to discuss integrated station development drainage plan
- 27 March 2024 – Review of comments on Design Guidelines and brief on Sydney Metro West Design Excellence Approach
- 25 June 2024 and 9 August 2024 – Meeting to discuss the amendments to the Design Guidelines
- 14 August 2024 – Briefing with Council prior to lodgement of Submissions Report

Sydney Metro presented to the Transport for NSW Working Group on 15 March 2023 to outline preliminary responses to the agency advice (December 2022). An email (dated 21 March 2024) was also sent to Transport for NSW to respond to agency advice (December 2022) to provide traffic models associated with the Transport and Access Report (Appendix EE of the exhibited EIS).

- Sydney Metro presented to the Heritage Working Group on 17 July 2024 to provide an update on the Concept SSDA and Submissions Report.

As part of this Submissions Report, Sydney Metro has prepared additional information in response to the agency advice and 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
- Updated mitigation measures
- Summary of Sydney Metro West Design Advisory Panel feedback
- Updated Building Envelope Drawings
- Addendum Built Form and Urban Design Report
- Updated Parramatta Over and Adjacent Station Development Design Guidelines
- Addendum SEPP (Housing) Compliance Report
- Addendum Solar Access and Overshadowing Report
- Updated Indicative Reference Scheme
- Updated Delineation Drawings
- Addendum Transport and Access Report

- Addendum Flooding Report
- Addendum Historic Heritage Impact Assessment
- Addendum Visual Impact Assessment
- Addendum Pedestrian Wind Assessment
- Addendum Integrated Water Management Plan
- Addendum Utilities and Infrastructure Report

## Project refinement and clarification

Since exhibition of the Concept SSDA, a number of design refinements are proposed in response to the submissions, agency advice received and Sydney Metro West Design Advisory Panel (DAP) advice.

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

- straightening and widening of Horwood Place (to be considered as part of Stage 3 Critical State Significant Infrastructure (CSSI) Approval) which has resulted in the removal of Building A podium 3m articulation zone and the eastern elevation of Buildings A and D towers have been reduced by approximately 7m (thereby reducing the floor plates)
- increase in quantum of commercial floorspace in Building B from 1,100m<sup>2</sup> to 2,616m<sup>2</sup> to comply with Clause 7.24 of the PLEP 2011
- inclusion of a tower shoulder to Building B along the southern boundary
- increase the southern setback of Building B envelope from 4.5m to 6m
- minor adjustments to the maximum building heights and approximate number of storeys for Buildings B and D envelopes following further design development
- additional 0.5m flexible facade zone on all tower elevations
- reduction in total GFA sought from 190,000m<sup>2</sup> to 176,360m<sup>2</sup> (excluding station infrastructure GFA that is approved under the Stage 3 CSSI Approval)
- associated refinements and clarifications around the flexible facade zone, Green Star rating, adaptive reuse of heritage items, maximum GFA exclusions and estimated station infrastructure GFA.

It is noted that since public exhibition of the SSDA, the *Parramatta Local Environmental Plan 2023 (PLEP 2023)* and *Parramatta Development Control Plan 2023 (PDCP 2023)* have been made and published. Clause 1.8A of the PLEP 2023 continues to apply the PLEP 2011 as it was the applicable LEP at the time the Concept SSDA was made. Neither PDCP 2023 nor its predecessor apply to the Concept SSDA as DCPs do not apply to State significant development under Clause 2.10 of the Planning Systems SEPP.

## Updated project description

To align with the refinements and clarifications, the description of the Concept SSDA has been updated. The text deleted is shown as ~~strikethrough~~ and new text is in **bold**:

The proposal seeks concept approval for ~~four building envelopes above and adjacent to the Parramatta metro station.~~ **Specifically, consent is sought for the following:**

- maximum gross floor area of ~~490,000~~ 176,360m<sup>2</sup> (excluding station infrastructure GFA that was approved under the Stage 3 CSSI Approval), comprising:
  - ~~48,900~~ **11,613**m<sup>2</sup> for residential accommodation
  - ~~463,250~~ **158,752**m<sup>2</sup> for commercial
  - ~~7,850~~ **5,995**m<sup>2</sup> for retail
- maximum building envelopes, heights and land uses for:
  - Building A – up to RL 172.7 (approx. 38 storeys) for commercial and retail uses
  - Building B – up to RL 130.0 (approx. ~~33~~ **30** storeys) for **commercial, retail and residential** and retail uses above a podium that incorporates a station **infrastructure** (which is subject to separate infrastructure application SSI 22765520)
  - Building C – up to RL 135.5 (approx. 26 storeys) for commercial and retail uses above a podium that incorporates station ~~services~~-**infrastructure** (which is subject to separate infrastructure application SSI 22765520)
  - Building D – up to RL 127.4 (approx. 24 storeys) for commercial and retail uses above a podium that incorporates **station infrastructure** (which is subject to separate infrastructure application SSI 22765520)
- maximum of ~~455~~ **451** car parking spaces
- adaptive reuse of the existing Kia Ora and George Street Shops heritage items for commercial premises

The updated Parramatta Over and Adjacent Station Development Design Guidelines will inform the detailed design of the development which will respond to many of the issues raised in the submission from Council. The updated Design Guidelines have been prepared in collaboration with Council and the Sydney Metro West Design Advisory Panel and provide further guidance on podium and tower design, Connecting with Country and adaptive reuse of the heritage items. The updated Design Guidelines have been refined to minimise overlap with the approved Sydney Metro West Station and Precinct Design Guidelines (SSI-22765520). Beyond those impacts previously assessed within the exhibited EIS, there will be no additional impacts as a result of the refinements and clarifications to the proposal. The refinements include additional measures where necessary to ensure any potential impacts are appropriately managed and mitigated.

## Conclusion

The Submissions Report has been prepared in response to the Planning Secretary's request that Sydney Metro provide a written response to submissions received during public exhibition of the Concept SSDA. The submissions and agency advice received during the public exhibition period have been collated, analysed, and addressed in this Submissions Report.

The proposed development remains substantially the same as that exhibited. This Submissions Report details the design refinements made in response to advice and submissions received as well as ongoing design development.

The potential environmental impacts arising from the proposed development have been comprehensively assessed and can be mitigated, minimised and/or managed to avoid unacceptable impacts to the site or the locality. This Submissions Report has considered all submissions and responded to each of the matters raised in the advice. The Submissions Report is supported by the technical appendices.

Overall, it is concluded that the proposed development remains consistent with the justification provided as part of the exhibited EIS for the following reasons:

- The proposal is consistent with the statutory and strategic planning context. The proposed building envelopes are consistent with the site's planning controls, and are compatible with the existing and future character of the Parramatta CBD
- The four proposed building envelopes have been developed to enable a degree of flexibility in the future detailed building design to allow a range of potential design outcomes that will facilitate a high quality development
- The proposal will deliver housing close to jobs and public transport, consistent with the '30-minute city' concept, which will provide greater residential amenity and contribute to reducing congestion associated with longer commutes
- The proposal reflects outcomes of community and stakeholder engagement undertaken for Sydney Metro West and in preparation of this application
- The proposal will provide additional employment and residential capacity in the Parramatta CBD as proposed by the Central City District Plan, ensuring that jobs and dwellings are co-located in a manner which reduces commute times and improves the level of access to facilities, services, transport options and public open space
- The building envelopes facilitate density appropriate for a transit orientated development and consistent with Future Transport 2056 and other Government policies to place density above major transport infrastructure
- The proposal includes a robust framework for the attainment of design excellence and ecologically sustainable development
- Future Detailed SSDA(s) will provide floorspace for approximately 9,750 direct full-time equivalent (FTE) ongoing jobs and 7,190 indirect ongoing FTE jobs
- The proposal will not result in any adverse social or economic impacts, is suitable for the site, and is in the public interest.



# 1 Introduction

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An Environmental Impact Statement (EIS) was prepared by Sydney Metro (Sydney Metro) in support of a Concept State Significant Development Application (SSDA) for the Parramatta metro station over station developments (OSD) and adjacent station development (ASD).

The Concept SSDA was lodged with the Department of Planning, Housing and Infrastructure (DPHI) (formerly the Department of Planning and Environment), on 10 November 2022 and was placed on public exhibition for 28 days between 16 November 2022 and 13 December 2022. A total of 19 submissions were received which included five submissions from community and business organisations, 13 submissions from members of the community and one submission from City of Parramatta Council. 10 advice letters from government agencies and authorities were also received during the public exhibition.

DPHI issued a letter to Sydney Metro on 16 December 2022 requesting a response to issues raised during the public exhibition which was followed by a further Request for additional information on 6 February 2023.

This Submissions Report has been prepared to respond to the issues raised in government agency advice and submissions received during the public exhibition period. Each of the submissions received have been collated, analysed and the relevant issues have been addressed. This Submissions Report has also been prepared to respond to the matters raised in the Request for additional information.

This Submissions Report has been prepared in accordance with the DPHI's *State Significant Development Guidelines – Preparing a Submissions Report (Appendix C)* dated March 2024.

## 1.1 Sydney Metro West

Sydney Metro West was approved as staged Critical State Significant Infrastructure (CSSI) under section 5.19 of the *Environmental Planning and Assessment Act 1979* (EP&A Act) and comprises the following:

- 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), approved on 11 March 2021 (SSI-10038);
- 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), approved on 24 August 2022 (SSI-19238057);
- 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), approved on 25 January 2023 (SSI-22765520).

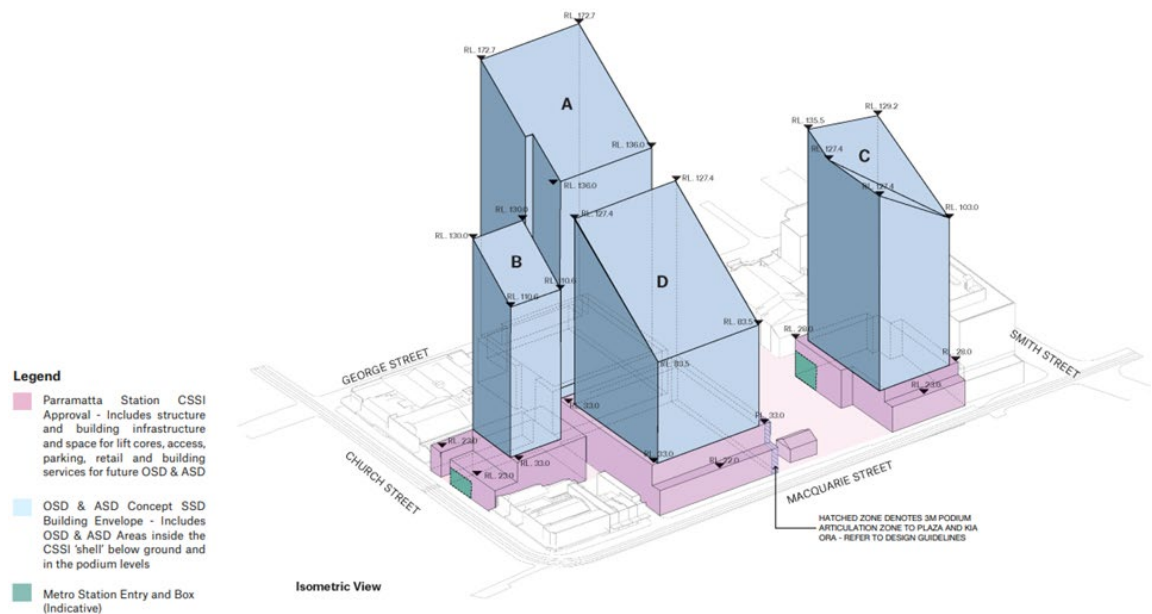
This Submissions Report includes references where relevant to certain matters which form part of the Stage 3 CSSI Approval, and are not matters which are part of the subject Concept SSDA or to be included in future Detailed SSDA(s) for the over and adjacent station developments. As outlined above, the Stage 3 CSSI Approval includes the construction of the station infrastructure and includes physical provisions to enable future over and adjacent station development to be carried out.

Specifically, at Parramatta, the podiums of Buildings B, C and D, in addition to the public domain work (including Civic Link) and excavation of the basement area, are not part of the subject SSDA and instead will be designed and constructed under the Stage 3 CSSI Approval.

## 1.2 Exhibited Project

The Concept SSDA seeks consent for four building envelopes above and adjacent to the Parramatta metro station. Buildings A, C and D are commercial office buildings and Building B is commercial and residential.

The exhibited EIS included the following figure (Figure 1-1) to illustrate the proposed envelopes (coloured blue) including the maximum RLs (Reduced Levels), the podiums approved under the CSSI approval (coloured purple) and the indicative location of Sydney metro station entrances (coloured green). Within the CSSI structures for Buildings B, C and D podiums there are internal areas to be considered in the Concept SSDA which includes structural elements and space for access and building services for future OSD and ASD.



**Figure 1-1 Building envelopes, as exhibited**

Furthermore, the project description stated:

*The proposal seeks concept approval for four building envelopes above and adjacent to the Parramatta metro station, including establishing:*

- Maximum GFA of 190,000m<sup>2</sup>, including:
  - 18,900m<sup>2</sup> for residential accommodation
  - 163,250m<sup>2</sup> for commercial
  - 7,850m<sup>2</sup> for retail
- Maximum building envelopes, heights and land uses for:
  - Building A – up to RL 172.7 (approx. 38 storeys) for a mixed use building with commercial and retail uses within the three storey podium and commercial office above
  - Building B – up to RL 130.0 (approx. 33 storeys) for a mixed use building with retail uses within the two storey podium and residential accommodation above

- Building C – up to RL 135.5 (approx. 26 storeys) for a commercial building with a three storey podium and tower above
- Building D – up to RL 127.4 (approx. 24 storeys) for a mixed use building with retail and commercial uses within the three storey podium and residential accommodation above
- Maximum of 455 car parking spaces across 3 basement levels

### 1.2.1 Interface levels

The exhibited EIS stated that the podiums of Buildings B, C and D, in addition to the public domain work, do not form part of the Concept SSDA, and instead form part of 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 podiums of Buildings B, C and D, and space for future lobbies, lift cores, access, loading docks and building services to enable the construction and operation of future over and adjacent station development.

Approval for the non-station uses within the Buildings B, C and D podiums and the basements are sought under the Concept SSDA. The design of the non-station uses and interface between the station and the OSDs (as indicated in Appendix J Demarcation Plans and Appendix I Indicative Reference Scheme) is conceptual in nature and would be resolved through further design refinement under future Detailed SSDA(s). The fit-out and use of the non-station spaces in the podiums are subject to approval under future approval(s).

#### Station Design and Precinct Plans

The station infrastructure, public domain and Civic Link form part of the Stage 3 CSSI Approval, and do not form part of this Concept SSDA. The Stage 3 CSSI Conditions of Approval E70, E71 and E72 require the preparation of Station Design and Precinct Plans (SDPPs), which document and illustrate the design of the permanent built works and landscape design of each metro station precinct and how they are to be maintained. The elements to be approved under the Stage 3 CSSI Approval include the permanent public domain and Civic Link (between George Street and Macquarie Street), roads, and podiums of Buildings B, C and D.

#### Interchange Access Plans

Interchange Access Plan(s) are to be developed under Condition of Approval E124 of the Stage 3 CSSI Approval for the metro station precinct to inform the final design of transport, access and service facilities, including the integration of public transport initiatives such as bus interchanges around the metro station. This would consider the interface between the station precinct and developments, and the bus interchange on Smith Street, and would be required to detail the pedestrian flow and safety requirements on Macquarie Lane.

## 1.3 Report structure

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

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

This Submissions Report is supported by the technical reports and documentation as outlined in Table 1-1. The reports and assessments are consistent with the updated project description provided in Section 3.3.4 of this report.

**Table 1-1 Supporting documentation**

<b>Appendix</b>	<b>Report</b>	<b>Summary</b>
<b>Appendix A</b>	Submissions register	Provides a categorical list of all advice and submissions received and identifies where each submission or agency advice has been addressed in this report.
<b>Appendix B</b>	Revised mitigation measures	Provides revised list of mitigation measures that will be implemented to minimise impacts from the proposed development.
<b>Appendix C</b>	Summary of Sydney Metro West Design Advisory Panel feedback	Summarises the feedback received from the Sydney Metro West Design Advisory Panel.
<b>Appendix D</b>	Updated Building Envelope Drawings	Includes minor updates in response to advice and submissions received, design refinements made since public exhibition, and clarification of a 0.5m flexible facade zone on all tower elevations.
<b>Appendix E</b>	Addendum Built Form and Urban Design Report	Responds to comments in relation to built form and urban design made in the request for additional information from the DPHI and the submission from the City of Parramatta Council.
<b>Appendix F</b>	Parramatta Over and Adjacent Station Development Design Guidelines	Includes updates to the Design Guidelines in response to government agency advice and consultation with the City of Parramatta Council which included meetings on 27 March 2024, 25 June 2024 and 9 August 2024.
<b>Appendix G</b>	Addendum SEPP (Housing) Compliance Report	Provides responses to matters relating to Building B (residential) raised by DPHI in the request for additional information and the submission made by the City of Parramatta Council.
<b>Appendix H</b>	Addendum Solar Access and Overshadowing Report	Provides a response to concerns of overshadowing raised by School Infrastructure NSW in relation to the potential overshadowing of Arthur Phillip High School and Parramatta Public School to the south-east.
<b>Appendix I</b>	Updated Indicative Reference Scheme	Includes updates made in response to advice and submissions received and design refinements made since public exhibition.
<b>Appendix J</b>	Updated Delineation Drawings	Consists of updated drawings delineating the scope of various approvals relating to the development.

Appendix	Report	Summary
<b>Appendix K</b>	Addendum Transport and Access Report	Provides a response to issues raised relating to transport and access from the DPHI in the request for additional information, the submission provided by the City of Parramatta Council, advice provided by Transport for NSW and a submission from a neighbouring landowner.
<b>Appendix L</b>	Addendum Flooding Report	Responds to issues raised in relation to the flooding assessment methodology and approach in advice provided by the NSW Department of Climate Change, Energy, Environment and Water – Biodiversity, Conservation and Science and the submission by the City of Parramatta Council. It concludes that future detailed SSDAs would ensure that flood risks to occupants are comprehensively assessed and consistent with the Parramatta Over and Adjacent Station Development Flooding Assessment.
<b>Appendix M</b>	Addendum Historic Heritage Impact Assessment	Provides a response to the issues raised in advice from Heritage NSW in relation to the impact on items of built heritage located on and immediately surrounding the site. It provides that the proposed tower envelopes would alter the setting of heritage items within the site and in the surrounding context. However, the change is consistent with the changing nature of the Parramatta CBD as supported by strategic planning initiatives. Due to urbanisation and the evolving needs of cities as populations grow and technology changes, the option of containing urban development to the scale of the traditional built environment would not satisfy current and future needs of contemporary society and in this regard, changes to the setting reflect a natural process of evolution and must be assessed against other changes affecting significance.
<b>Appendix N</b>	Addendum Visual Impact Assessment	<p>Responds to visual impact matters raised by the DPHI in the request for additional information, in advice provided by the NSW Department of Climate Change, Energy, Environment and Water and Schools Infrastructure NSW. It provides that the Concept SSDA is considered to retain existing views and their character, and is consistent with the design principles applying to all development as well as the vision and design guidelines for the City Centre area under the 'Development in Parramatta City and the Impact on Old Government House and Domain's World and National Heritage Listed Values Technical Report' prepared by Planisphere and published in 2012.</p> <p>It concludes the Concept SSDA can be supported on the grounds of visual impact on the public domain appropriate to this stage of the planning process.</p>

Appendix	Report	Summary
<b>Appendix O</b>	Addendum Pedestrian Wind Assessment	<p>Provides additional wind modelling in order to demonstrate that there will be no safety or amenity impacts arising from the design refinements made since public exhibition. It concludes that the wind conditions are generally suited for the intended uses of most areas, with conditions suitable for standing achieved in all areas. It also indicates that wind speeds are generally compliant with the intended usage. However, the target comfort criteria of sitting (outdoor café seating) for the lane between Buildings A and D and for the Horwood Place frontages to these buildings is not achieved.</p> <p>It was noted that the assessment did not include the effects of trees and other landscaping features. It is possible that including those will reduce the wind speeds sufficiently to achieve the desired comfort criteria. Alternatively, adequate wind mitigation can likely be provided by awnings and/or porous screens. Such mitigation measures can be considered in future Development Applications.</p>
<b>Appendix P</b>	Addendum Integrated Water Management Plan	<p>Responds stormwater comments provided by the City of Parramatta Council in a submission. In response to feedback from the City of Parramatta Council, the stormwater quantity design has been updated in accordance with the relevant guidelines, providing storage within the building developments and connection to public domain and the City of Parramatta network. Further, the stormwater quality design has been developed in accordance with the relevant guidelines and achieved the required targets. Further design detail would be provided as part of future Detailed SSDAs.</p>
<b>Appendix Q</b>	Addendum Utilities and Infrastructure Report	<p>Includes responses to advice provided by Sydney Water and a submission from Endeavour Energy. It concludes that hydraulic analysis to demonstrate that the current performance of the wastewater system does not deteriorate in both dry and wet weather have been provided in Chapter 3. It also provides that other matters raised would be addressed as part of the future Detailed SSDAs.</p>
<b>Appendix R</b>	Demarcation Drawings – Additional GFA Study	<p>Outlines opportunities in which additional GFA can be achieved (above the Indicative Reference Scheme) as part of future Detailed SSDA(s) while being contained wholly within the parameters of the Stage 3 CSSI Approval and the OSD and ASD Concept SSDA Building Envelopes.</p>

## 2 Analysis of submissions

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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 submission

A total of 19 submissions were received which included five submissions from business organisations, 13 submissions from members of the community and one submission from the City of Parramatta Council. Submissions were made in support and objection, as set out in the following sections.

A total of 10 advice letters from government agencies and authorities were also received during the public exhibition. All agency advice and submissions were managed by the DPHI, which included registering and uploading the submissions and advice onto the Major Projects website.

A response to Council and government agencies, organisations, and each of the public submissions has been prepared. An overview of the submissions and a summary of the process undertaken to ensure the submissions have been accurately responded to is provided below.

#### 2.1.1 Government agency advice

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

- Transport for NSW
- Sydney Water
- NSW Department of Climate Change, Energy, Environment and Water – Biodiversity, Conservation and Science (formerly Department of Planning and Environment – Biodiversity and Conservation)
- NSW Department of Climate Change, Energy, Environment and Water – Heritage NSW (formerly Department of Planning and Environment – Heritage NSW)
- NSW Department of Climate Change, Energy, Environment and Water – Water Group (formerly Department of Planning and Environment – Water Group)
- Schools Infrastructure NSW
- Fire and Rescue NSW
- NSW Environmental Protection Authority
- Sydney Metro
- Ausgrid.

No government agency or authority has objected to the proposed development. Details of the matters raised in government agency advice, along with Sydney Metro's response, are set out in Section 4.1.

#### 2.1.2 Council submission

The City of Parramatta Council made a submission in support and provided comments on the proposed development. Details of the matters raised in Council's submission and Sydney Metro's response are set out in Section 4.1 of this report.

### 2.1.3 Organisation submissions

A total of five submissions were received from organisations, comprising the following:

- Urban Taskforce Australia
- Western Sydney Leadership Dialogue
- Mirvac
- Endeavour Energy
- Dehsabzi Enterprises Pty Ltd.

Of the five organisation submissions, one was an objection, one was in support, and three provided comments. Details of the matters raised in organisation submissions, along with Sydney Metro's response, are set out in Section 4.2 of this report.

### 2.1.4 Community submissions

A total of 13 submissions were received from members of the community. Of the public submissions, five were objections, three were in support, and five provided comments. Details of the matters raised in public submissions, along with Sydney Metro's response, are set out in Section 4.2 of this report.

## 2.2 Categorising key issues

In accordance with the DPHI's *State significant development guidelines – preparing a submissions report*, the issues raised in the agency advice and submissions are summarised in Table 2-1. A response to all agency advice and submissions is provided in Section 4 of this report.

**Table 2-1 Supporting documentation**

Category of issue	Summary of matters raised	Issue raised
<b>Impact to neighbouring sites</b>	<p>The landowner of the neighbouring 75 George Street requested that the proposed development enable Macquarie Lane to be used for vehicular access to 75 George Street to support the future redevelopment of 75 George Street.</p> <p>The adjoining landowner to the south-west commented the metro station site does not adequately address or consider the possible development outcomes on the land to the west of Building A. The size of the building envelopes and the reduced setbacks along the western boundary may impact the development potential of neighbouring sites, which should be considered in a reference design.</p> <p>The adjoining landowner of 240 Church Street commented that the Site next to Building B will be landlocked and requested to be included in the masterplan and have a basement connection.</p>	<p>2 organisation submissions</p> <p>2 public submissions</p>



Category of issue	Summary of matters raised	Issue raised
<b>Heritage</b>	<p>Heritage NSW raised concern in regard to the potential visual and view corridor impacts to the heritage items in close proximity to the site. It was highlighted the proposed development has the potential to visually dominate heritage items creating a loss of heritage context.</p> <p>An adjoining landowner to the north-west commented that the proposed development does not consider the broader relationship with surrounding land, including historical development patterns and lot sizes. This includes fitting seamlessly into its context, complementing the surrounding area, particularly near the historic Church Street.</p> <p>A member of the public noted that the location of Building A and B basement entrance would devalue the significance of the heritage Shops (43-47 George Street).</p>	<p>1 agency advice</p> <p>1 organisation submission</p> <p>1 public submission</p>
<b>Building height and form</b>	<p>Public submissions included comments regarding height and form. Recommendations included:</p> <p>The proposed buildings should be at least 40 storeys high and have at least 20% more GFA, including more residential accommodation GFA</p> <p>Building heights for A, D and C should be reduced considering the high rates of vacancy/oversupply of commercial floorspace in the Parramatta CBD</p> <p>Buildings A, C and D should be broken up into a series of thinner, smaller buildings</p> <p>The design of the Building C podium should reflect the Roxy Theatre.</p>	<p>2 public submissions</p>
<b>Design excellence</b>	<p>The City of Parramatta Council requested that Sydney Metro review the Design Excellence strategy via the requirements of Clause 7.12 of the PLEP 2011 and appropriate justification is to be provided if the review is contrary to these requirements.</p> <p>An adjoining landowner to the north-west requested that any design excellence process outside of that within PLEP 2011 must not be able to utilise the bonuses possible under the PLEP 2011 for design excellence.</p>	<p>1 Council comment</p> <p>1 organisation submission</p>
<b>Traffic and access</b>	<p>The City of Parramatta Council stated that they do not support the shared zone within Civic Link between Macquarie Street and George Street and highlighted that the southern basement produces a high amount of vehicles into a shared zone which is</p>	<p>1 Council comment</p> <p>1 agency advice</p>

Category of issue	Summary of matters raised	Issue raised
	<p>located in close proximity to the main pedestrian entry to Parramatta metro station.</p> <p>The City of Parramatta Council stated that there was no evidence of any model calibration and validation is provided to enable a critical assessment of the traffic impacts to the Parramatta Light Rail.</p> <p>Transport for NSW requested that the amount of car parking is reduced and public transport and active transport modes are promoted.</p>	
<p><b>Flooding and Stormwater</b></p>	<p>The City of Parramatta Council requested an electronic copy of all drainage and flood models together with a copy of the flood report.</p> <p>The City of Parramatta Council also commented that drainage capacity is limited on Smith Street and should be further investigated to ensure a realistic representation of flood behaviour. Further, additional drainage system and overland flow path through the proposed Civil Link to drain overflows from Macquarie Street in the 1% AEP should also be included in this design.</p> <p>The City of Parramatta Council and NSW Department of Climate Change, Energy, Environment and Water – Biodiversity, Conservation and Science noted that their preference would be to avoid mechanical flood barriers and to design entry levels to protect from all flood events up to and including the Probable Maximum Flood (PMF).</p> <p>The City of Parramatta Council also noted that proper consideration of flood emergency management is required for ground floor retail/ commercial areas that do not have internal access to refuge areas, nor protection to the PMF.</p> <p>The NSW Department of Climate Change, Energy, Environment and Water – Biodiversity, Conservation and Science also provided advice in relation to the flood emergency management requiring greater detail in regard to the proposed management strategies.</p>	<p>1 Council comment</p> <p>1 agency advice</p>

Category of issue	Summary of matters raised	Issue raised
<b>Land use</b>	<p>The Western Sydney Leadership Dialogue stated that 30 percent of the residential component should be designated social and affordable housing with incentives for tenders to deliver above the 30 percent minimum.</p> <p>A community member stated that Building B should be deleted as there is an oversupply of residential floorspace in the Parramatta CBD.</p>	<p>1 organisation submission</p> <p>1 public submission</p>
<b>Design guidelines</b>	<p>The City of Parramatta Council requested that the Over and Adjacent Station Development Design Guidelines are developed in collaboration with Council to ensure continuity with the City's Civic Link Design Brief and to develop a coordinated design with Country approach. Council commented that the Guidelines do not adequately address the interrelated place outcomes across both the development and public domain.</p> <p>Council requested that the Building envelope drawings and Over and Adjacent Station Development Design Guidelines are amended in accordance with the Parramatta CBD Development Control Plan 2021 to address the spatial layout of the public domain.</p>	<p>1 Council comment</p>
<b>Public domain</b>	<p>The City of Parramatta Council requested that Horwood Place be straightened and widened with a 14m street reservation width to accommodate parking, footpaths and tree planting along both sides of the street and to ensure Kia Ora has an appropriate curtilage and setting.</p> <p>The City of Parramatta Council also commented Roxy Theatre is required to have an active frontage to Macquarie Lane.</p>	<p>1 Council comment</p>
<b>Residential floor space</b>	<p>The City of Parramatta Council outlined they cannot legally support the proposed clause 4.6 variation as this contravenes Clause 4.6(8)(ca) of the PLEP 2011, which caps any floor space variation at 5%.</p>	<p>1 Council comment</p>
<b>Tower separation</b>	<p>An adjoining landowner to the north-west outlined the Concept SSDA does not adequately analyse the spatial arrangement between Building A and land to the west with regard to complying with the Apartment Design Guide (NSW Department of Planning and Environment, 2015) separation requirements, protecting amenity, providing solar access, and studying the spatial separation between towers in this part of the CBD.</p>	<p>1 organisation submission</p>

<b>Category of issue</b>	<b>Summary of matters raised</b>	<b>Issue raised</b>
<b>Construction noise</b>	A community member stated construction noise is an inconvenience for local residents.	1 public submission
<b>Overshadowing and visual impact to local schools</b>	<p>Schools Infrastructure NSW commented that there a number of schools within the surrounding area and the proposal must demonstrate that at least 70% of school spaces, including outdoor school play spaces, receive direct sunlight between 9am and 3pm in mid-winter.</p> <p>Schools Infrastructure NSW also outlined that viewpoint 3 of the visual impact assessment does not identify that there is an educational receiver at this location.</p>	1 agency advice
<b>Future Detailed SSDA(s)</b>	Schools Infrastructure NSW requested further detail to be provided in future Detailed SSDA(s) in regard to overshadowing, privacy and traffic during construction and operation.	1 agency advice

## 3 Actions taken since exhibition

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This section summarises the stakeholder and community engagement that has been undertaken during and following the exhibition period, as well as the additional assessment, refinement and clarifications that have been made to the project since its public exhibition. It also outlines the additional assessment undertaken to respond to DPHI's request for 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 stakeholders and the community 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 with 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](http://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 7,400 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 three community information sessions where displays and information about the EIS were made available. The sessions were held on 21 November 2022 from 11am – 2pm and 3pm – 7pm at Club Parramatta, 2 Macquarie Street, Parramatta and on 23 November 2022 at the Parramatta Farmers Market, Centenary Square.

Members of the community were invited to attend the 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 was a combined total of 90 visitors at the three community information sessions.

Copies of the EIS, summary booklet and information boards were available for visitors to view at all of the information sessions. Project newsletters, contact cards and fridge magnets were also available for visitors to take away.

Several information boards were presented, such as an overview of the proposal. 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 during the exhibition period. Community members were able to explore interactive maps and learn what to expect from the project. The portal displayed information from the EIS, as well as outlines of the of the proposed building envelopes. There were over 8,311 visits to the interactive portal during the exhibition period. An image of the interactive portal is provided in Figure 3-1.

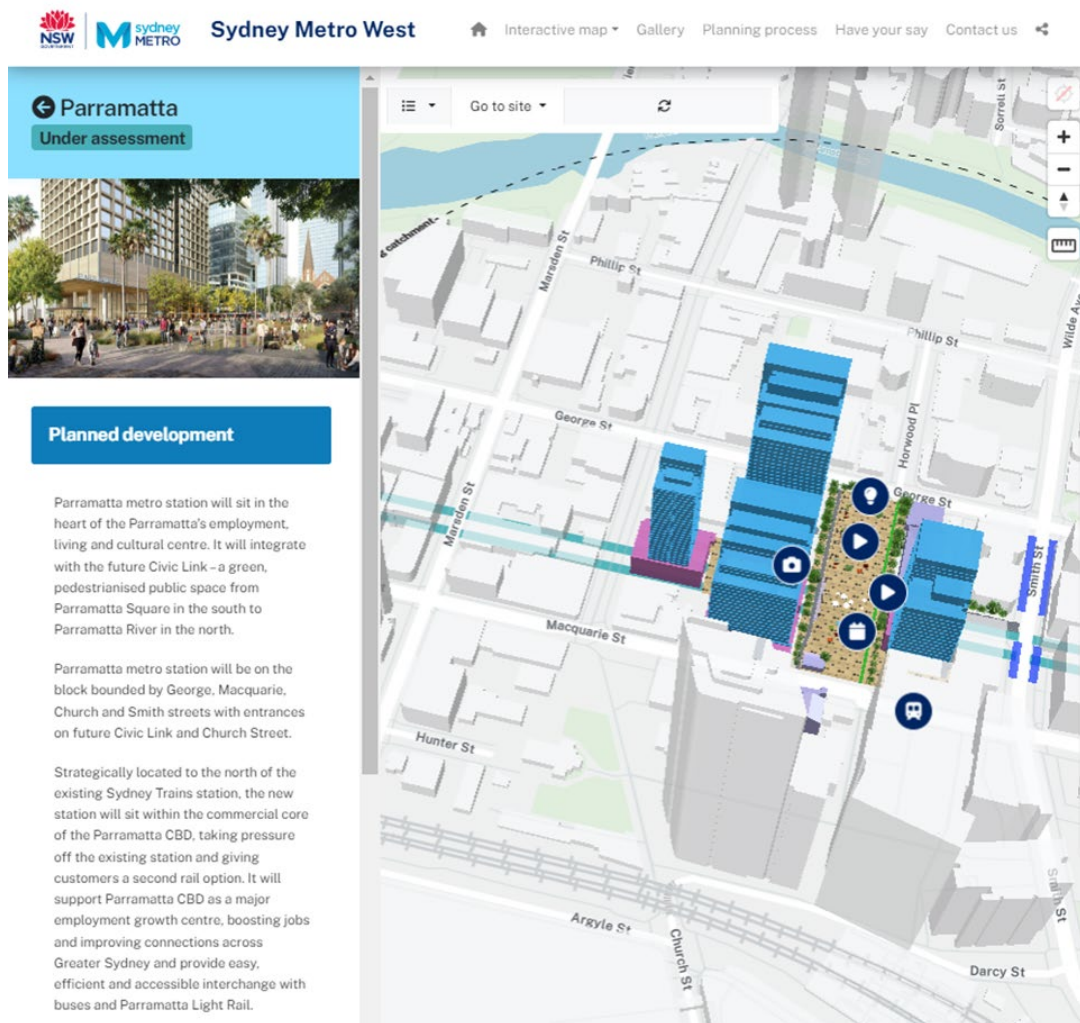


Figure 3-1 Interactive Planning Portal

### 3.1.5 EIS Overview document

A summary of the EIS was prepared to support the community information sessions (available at [https://www.sydneymetro.info/sites/default/files/2022-11/Parramatta\\_metro\\_station\\_over\\_and\\_adjacent\\_station\\_development\\_proposal\\_0.pdf](https://www.sydneymetro.info/sites/default/files/2022-11/Parramatta_metro_station_over_and_adjacent_station_development_proposal_0.pdf)).

The EIS overview document included:

- information on Sydney Metro West, Parramatta 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 (<https://www.sydneymetro.info/metrowest>).

### 3.1.6 Further consultation with City of Parramatta Council

Further consultation has been undertaken with City of Parramatta Council following lodgement of the Concept SSDA. Key meeting dates and discussions with City of Parramatta Council following lodgement of the SSDA are provided below:

- 15 December 2022 – 1st design workshop on Civic Link and Horwood Place
- 13 February 2023 – 2nd design workshop on Civic Link and Horwood Place
- 12 October 2023 – Meeting to discuss integrated station development drainage plan
- 1 March 2023 – 3rd design workshop on Civic Link and Horwood Place
- 12 October 2023 – Meeting to discuss integrated station development drainage plan
- 27 March 2024 – Review of comments on Parramatta Over and Adjacent Station Development Design Guidelines and brief on Sydney Metro West Design Excellence Approach
- 25 June 2024 and 9 August 2024 – Meeting to discuss the amendments to the Parramatta Over and Adjacent Station Development Design Guidelines
- 14 August 2024 – Briefing with Council prior to lodgement of Submissions Report
- 19 June – Email sent which included the updated Parramatta Over and Adjacent Station Development Design Guidelines for Council to review and provide comments on.
- Mid-November 2024 – Email sent which includes the MUSIC model

### 3.1.7 Government agencies

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

- 15 March 2023 – Meeting with the TfNSW Working Group to outline the Concept SSDA and provide preliminary responses to TfNSW agency advice.
- 10 July 2024 – Meeting with the DPHI to provide an overview of the Submissions Report. Additional meetings (mostly on a monthly basis) have also been held to discuss any matters relating to the Concept SSDA and Submissions Report.

- 21 March 2024 – Email sent to TfNSW to respond to agency advice to provide traffic models associated with the Transport and Access Report (Appendix EE of the EIS).
- 17 July 2024 – Meeting with Heritage Working Group (Heritage NSW) to provide an update on the Concept SSDA and Submissions Report.
- 2 October 2024 – Briefing with Ms Donna Davis, the State Member for Parramatta, to discuss the Concept SSDA.

## **3.2 Additional assessment**

Since the exhibition of the Concept SSDA and the receipt of submissions and request for additional information letter from the 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 Refinements and clarifications to the project**

### **3.3.1 Refinements to the proposed envelopes and concept elements**

A number of refinements and clarifications are proposed in response to the agency advice and submissions received. These refinements do not fundamentally alter the proposal and comprise minor changes which remain within the parameters of the initial project description and exhibited building envelope plans. They are summarised in the below subsections.

#### **Realignment of built form along Horwood Place**

The built form along the western side of Horwood Place has been reduced, which addresses comments raised by City of Parramatta Council provides a higher level of consistency with the indicative built form layout as expressed in Section 6.5.2, Figure 6.5.2.4 (Civic Link Streets and Public Space) of the City of Parramatta Development Control Plan 2011 (PDCP 2011).

This has been achieved by removing the three metre podium articulation zone along the eastern elevation of Building A (Figure 3-2) and the eastern elevation of Buildings A and D towers have been reduced by approximately 7m (thereby reducing the floor plates). The realignment of Horwood Place also enables the removal of the three metre podium articulation zone along the western elevation of Building D, although this falls within the ongoing design development of the CSSI scope of work.



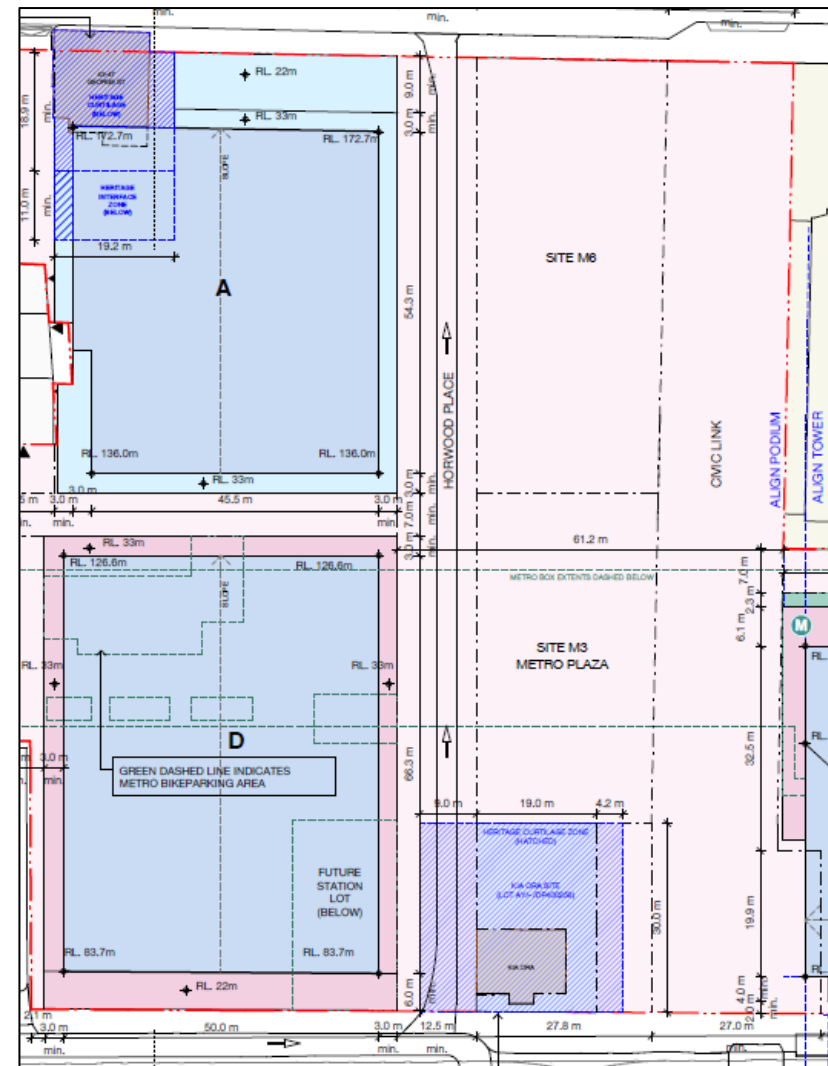
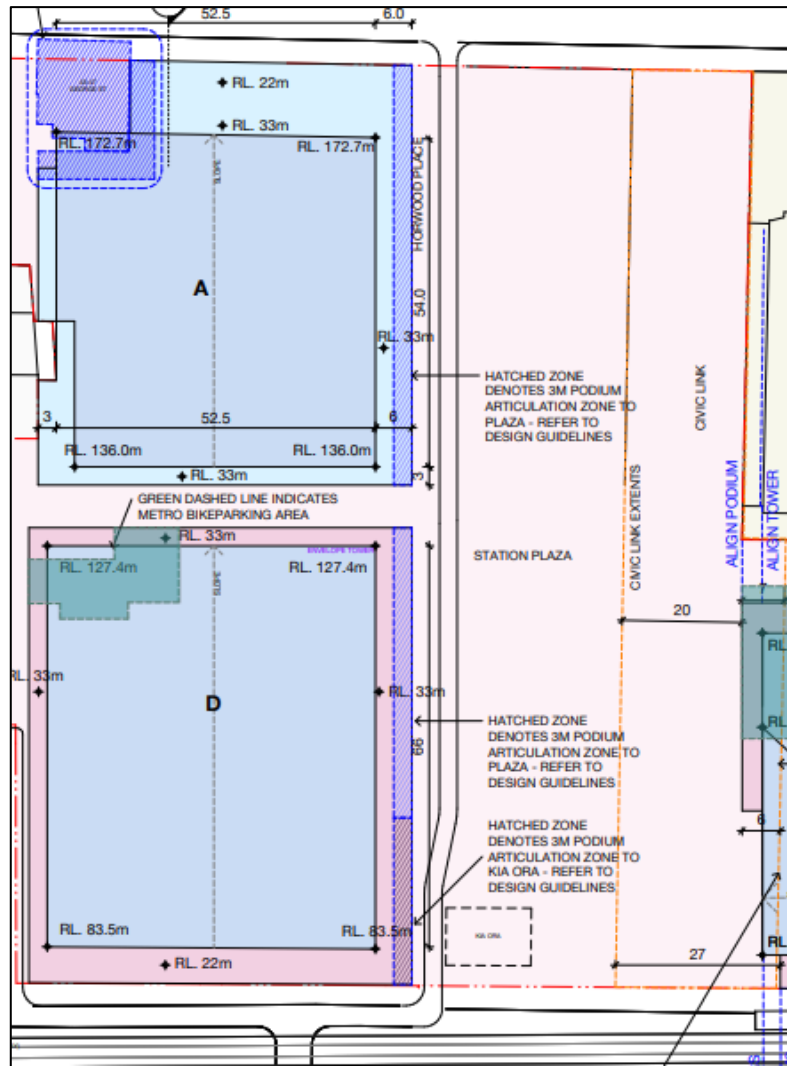


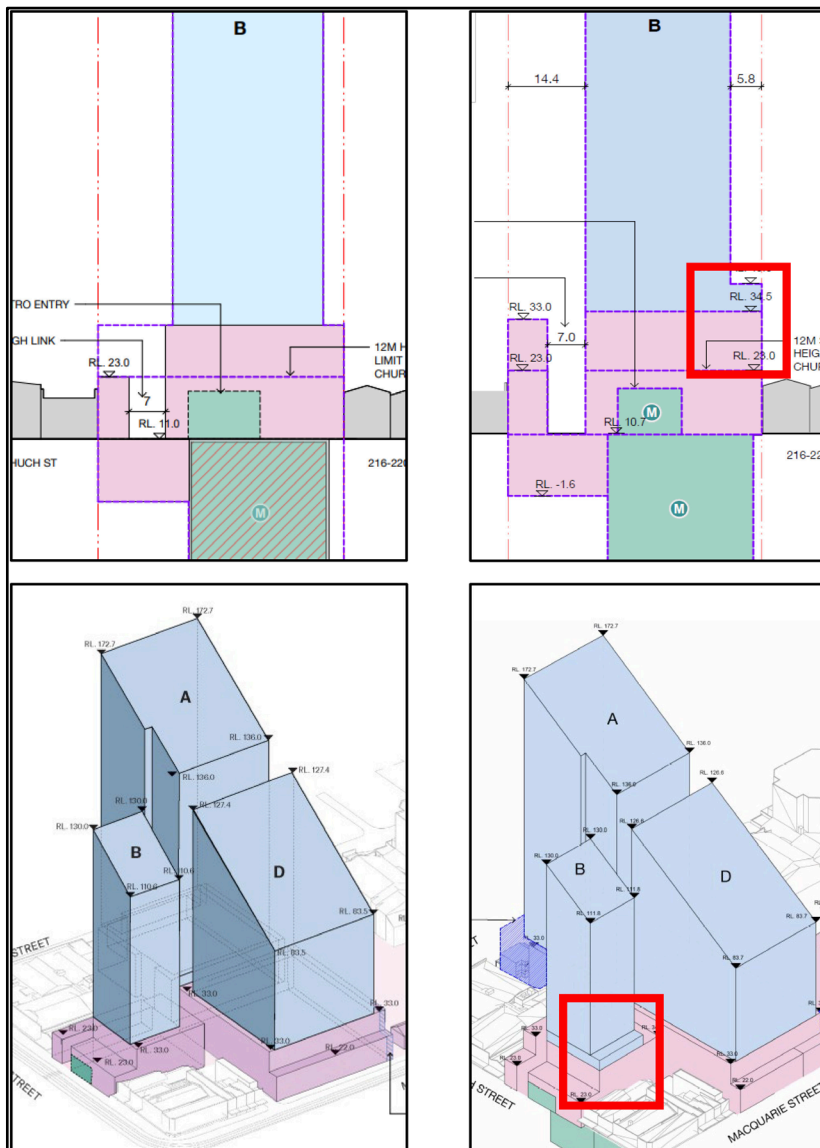
Figure 3-2 Horwood Place layout, as exhibited (left) and as amended (right) with Building A podium articulation zone removed

### Inclusion of a tower shoulder to Building B

A tower shoulder has been included above the podium along the southern elevation of Building B, which will extend to RL 40. It will not extend the full floor plate of the podium below and is a tower shoulder which is set off the eastern elevation. This is a result of a design development of the internal station structural requirements and further detailed design as part of the Stage 3 CSSI Approval.

It is noted that this additional height is located within the OSD envelope as it accommodates OSD components, rather than the Stage 3 CSSI envelope below (Figure 3-3). The tower shoulder in the Indicative Reference Scheme incorporates plant/additional structural transfers for the OSD and is not intended to comprise of habitable floorspace. However, further design refinement will occur under a future Detailed SSDA, which may or may not seek to utilise the shoulder depending on final servicing requirements.

Furthermore, the Parramatta Over and Adjacent Station Development Design Guidelines (Appendix F) have been amended to include design guidance as to where stepping is required for the tower shoulder, a sensitive architectural response is required.



**Figure 3-3 Building B 3D SW View, as exhibited (left) and as amended (right), showing additional height to the south-western corner (red highlight)**

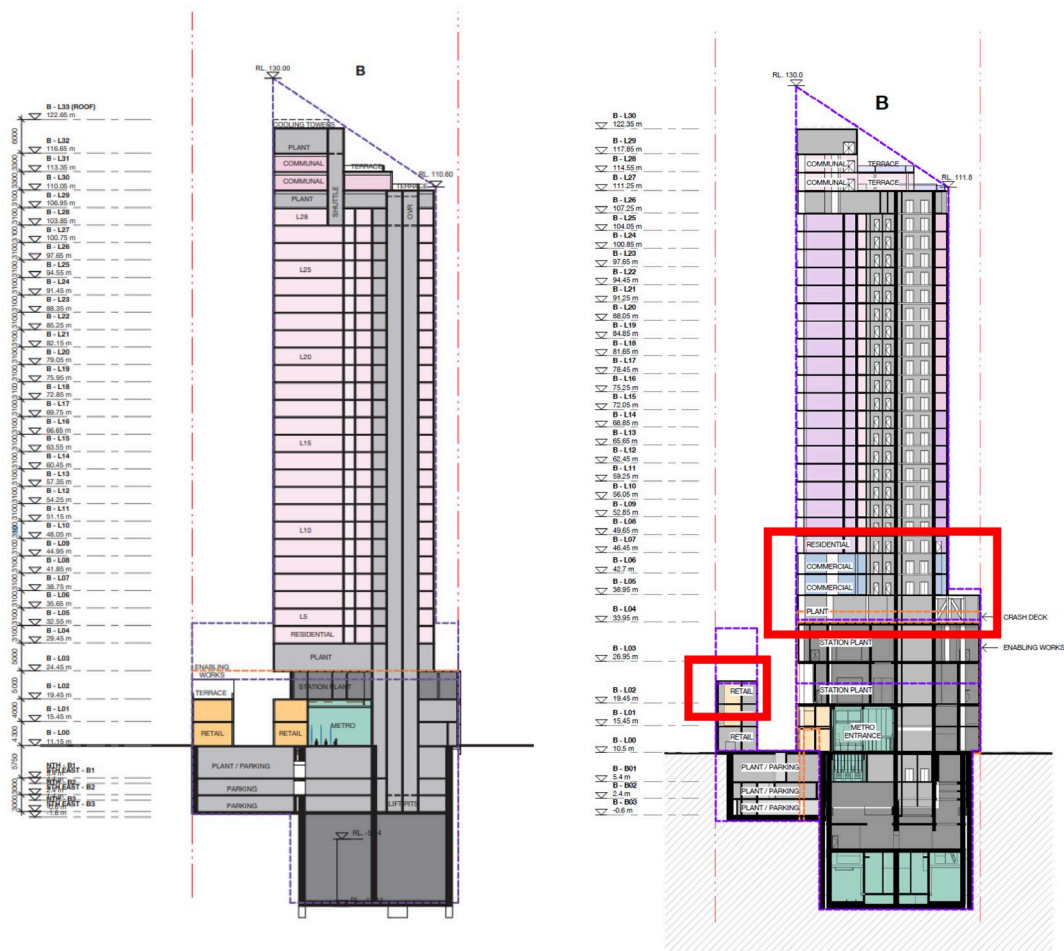
## Increase in Building B commercial floorspace

In response to comments from City of Parramatta Council, the quantum of commercial floorspace in Building B has been increased from 1,100m<sup>2</sup> (retail) to 2,616m<sup>2</sup> (including 1,494m<sup>2</sup> commercial and 1,122m<sup>2</sup> retail) in compliance with Clause 7.24 of the PLEP 2011 which requires a minimum of 1:1 commercial FSR to be provided within the building.

Amendments have been made to the Indicative Reference Scheme to show how this additional floorspace may be accommodated. This includes the following design changes (Figure 3-4):

- expanding the quantum of retail floorspace on ground level
- introducing retail floorspace to Level 2 fronting 240 Church Street, increasing the height at this location from RL 23 to RL 33 (**note:** the increase to the height of the podium from RL 23 to RL 33 will be considered in the Stage 3 CSSI as part of further design development)
- introducing commercial office floorspace to Levels 5 and 6

It is noted that the Indicative Reference Scheme will not be approved and demonstrates only one way a development could be achieved for the site within the parameters of the building envelopes.



**Figure 3-4 Building B indicative reference scheme section, as exhibited (left) and as amended (right), showing additional retail and the introduction of commercial floorspace (red highlight)**

### Increase in Building B southern tower setback

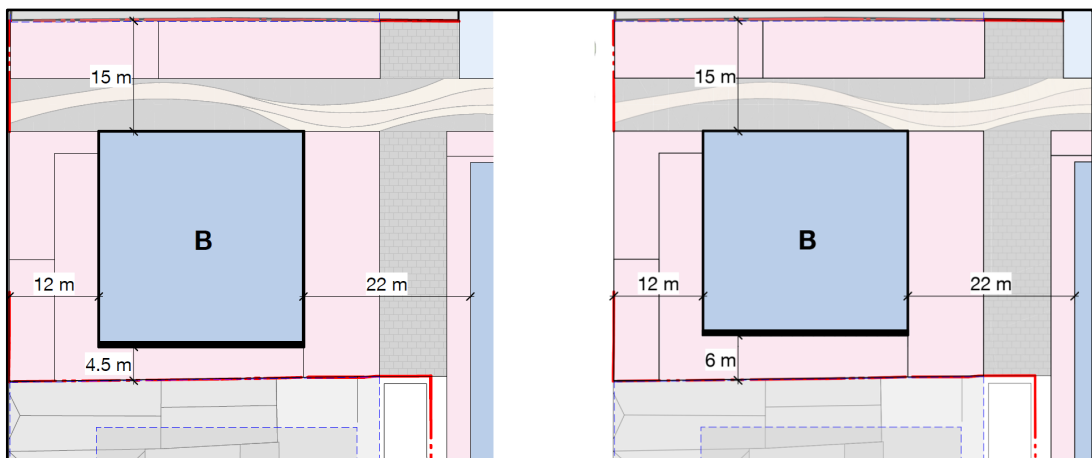
The southern setback of the Building B tower envelope has been increased from 4.5 metres to 6 metres in response to DPPI advice. The Building B tower envelope as exhibited adopted a 4.5 metre setback to the southern boundary on the basis that the southern building facade contains no windows.

In response to advice from DPPI, the southern setback has been increased from 4.5 metres to 6 metres for full compliance with the Apartment Design Guide (ADG), refer to Figure 3-5. Six metres is a complying side boundary setback dimension for a building which is nine and above storeys in height, provided that visual privacy is maintained between Building B and future development to the south.

Additionally, Section 2.3 'Tower Massing and Envelopes' of the Parramatta Over and Adjacent Station Development Design Guidelines (Appendix F) has been updated to ensure visual privacy between Building B and future development to the south, in a manner that enables openings on the southern elevation of Building B to avoid future development resulting in a blank façade. This includes:

- Windows on the southern elevation should either be offset with windows adjoining to the southern neighbour, have a minimum sill height of 1.7 metres or incorporate privacy screens or louvres to prevent direct overlooking between buildings
- Future detailed design of the Building B southern elevation should be articulated to provide visual interest and break down the scale and massing of the façade.

The Indicative Reference Scheme (Appendix I) demonstrates that it is feasible for no windows or habitable rooms to be provided at this frontage.

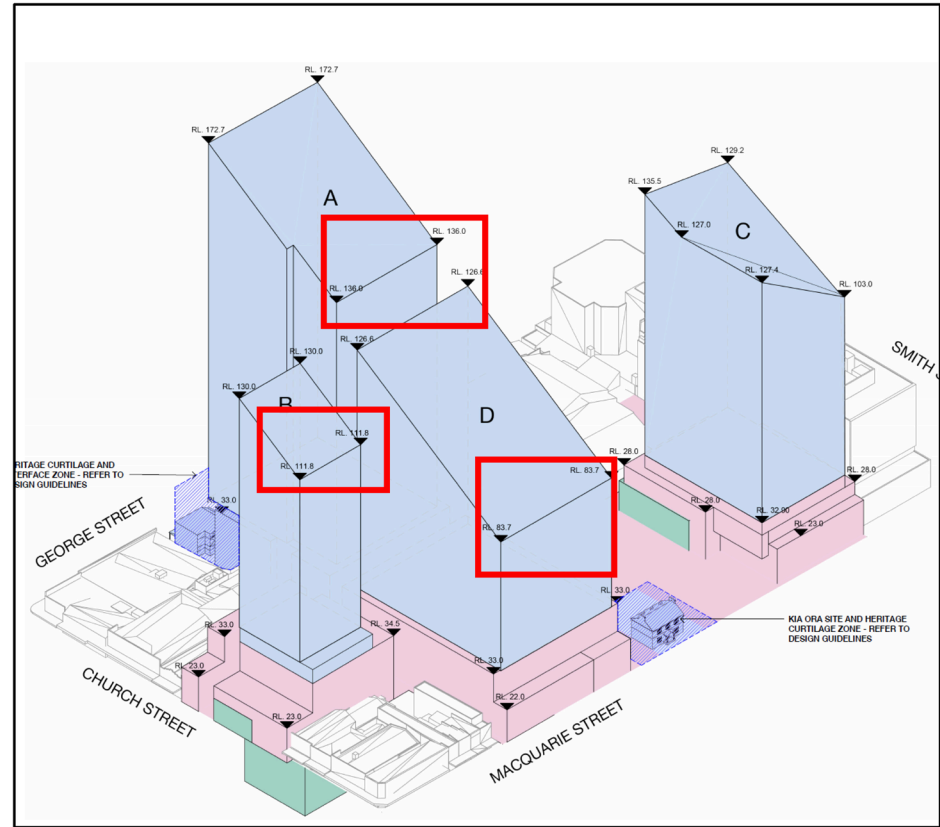
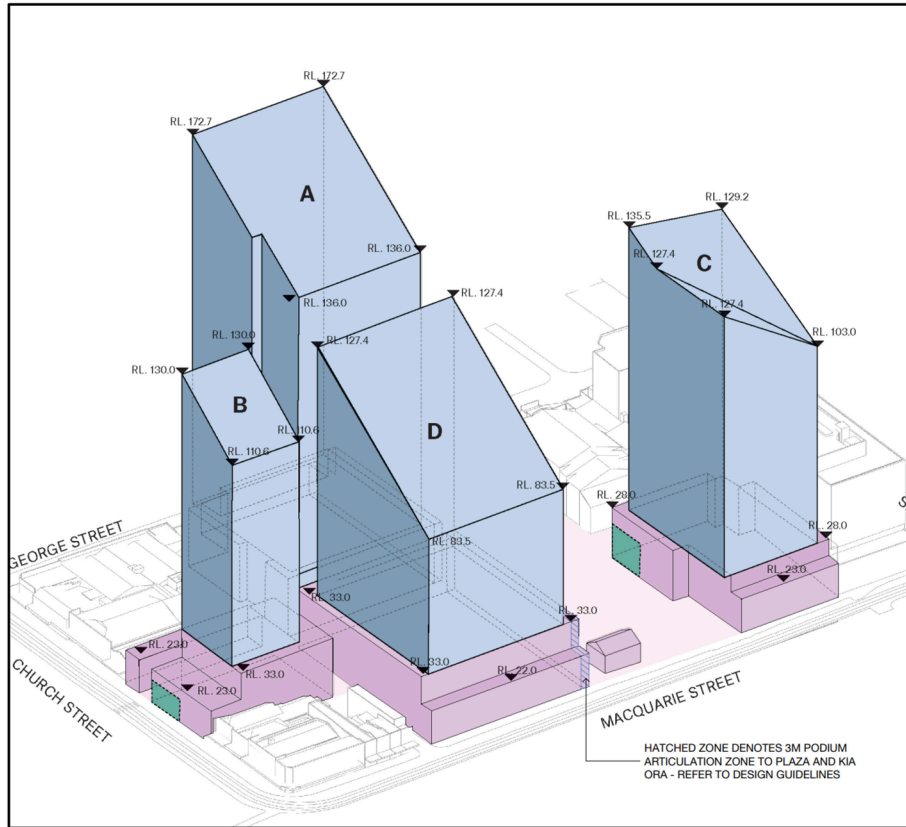


**Figure 3-5 Building B tower envelope, as exhibited (left) and as amended (right), with southern setback increased from 4.5m to 6m**

### Minor adjustments in height of Buildings B and D

Minimal adjustments are proposed to the maximum building heights of the Buildings B and D envelopes following further detailed design and coordination (Figure 3-6). No increase is proposed to the overall maximum heights of any envelope. Specifically, there is an:

- Increase in height of the southern edge of the Building D tower envelope from RL 83.5 to RL 83.7.
- Decrease in height of the northern edge of the Building D tower envelope from RL 127.4 to RL 126.6.
- Increase in height of the southern edge of the Building B tower envelope from RL 110.6 to RL 111.8.



**Figure 3-6 Building envelopes, as exhibited (left) and as amended (right), with adjustments to Building B and D highlighted in red**

### **Flexible façade zone**

The Indicative Reference Scheme (Appendix H of the EIS) included minor projections for façade treatment outside of the proposed building envelopes. DPHI requested in their Request for Additional Information letter (item 7 'other issues') that all Architectural Drawings are to be reviewed for consistency with regard to setbacks and envelope dimensions. In response, this section provides clarification on the proposed façade zone which is included as part of the Concept SSDA.

The façade zone applies to all towers of Buildings A, B, C and D, and does not apply to the podiums. The façade zone only allows for minor projections outside of the building envelope no greater than 500mm, for the following purposes:

- architectural features
- sun shading devices

The façade zone would not include any Gross Floor Area and not create any significant additional bulk and scale. The future Detailed SSDA would need to be consistent with objectives of the Parramatta Over and Adjacent Station Development Design Guidelines and must be designed to achieve design excellence.

To provide further clarity around the parameters of the façade zone, the following clarifications have been incorporated:

- The updated Parramatta Over and Adjacent Station Development Design Guidelines (Appendix F) include guidance around the location and details of the façade zone
- A note has been included in the Updated Building Envelope Drawings (Appendix D) which states: Minor projections outside of the tower envelope for non-habitable architectural features and sun shading are permissible, but shall not extend further than 500mm.

In summary, the façade zone which applies to the towers of Buildings A, B, C and D shall:

- only be used for the purposes of architectural features and sun shading
- not project greater than 500mm from the tower building envelopes
- not include any GFA.

### **Reduction in total GFA**

The total quantum of GFA sought is proposed to be reduced by 13,640m<sup>2</sup> from 190,000m<sup>2</sup> as exhibited, to 176,360m<sup>2</sup> as proposed which is further discussed in Section 3.3.2.

#### **3.3.2 Refinements to GFA and the Indicative Reference Scheme**

The Indicative Reference Scheme has been refined to reflect the proposed design refinements to the concept envelopes, and as a result the Indicative Reference Scheme GFA and parking provision has been reduced as described further below. It is noted that the Indicative Reference Scheme will not be approved and demonstrates only one way a development could be achieved for the site within the parameters of the building envelopes.

### **Proposed GFA**

The Concept SSDA proposal as amended under this Submissions Report is now seeking consent for a maximum GFA of 176,360m<sup>2</sup>, which is less than the 190,000m<sup>2</sup> sought under the exhibited scheme. A summary breakdown of the revised GFA Breakdown is provided in Table 3-1 below.

**Table 3-1 Proposed GFA breakdown – as amended**

<b>Building</b>	<b>GFA</b>
<b>GFA within the Stage 3 CSSI Approval envelope</b>	
Building B podium	1,418m <sup>2</sup>
Building C podium	3,290m <sup>2</sup>
Building D podium	8,262m <sup>2</sup>
<b>GFA within the Concept SSDA building envelopes</b>	
Building A podium and tower	71,729m <sup>2</sup>
Building B tower	12,684m <sup>2</sup>
Building C tower	33,194m <sup>2</sup>
Building D tower	45,783m <sup>2</sup>
<b>Total GFA for Concept SSDA</b>	<b>176,360m<sup>2</sup></b>

### Indicative Reference Scheme GFA

The overall GFA for the Indicative Reference Scheme has also been reduced by 22,538m<sup>2</sup> (approximately 12%) from the exhibited scheme (190,000m<sup>2</sup>) to the current Indicative Reference Scheme (167,462m<sup>2</sup>) to reflect the design refinements and clarifications outlined above and ongoing design development for Parramatta metro station.

The design refinements in the Concept SSDA which have reduced the GFA are associated with Horwood Place realignment, Building B design refinements and increase of station infrastructure (which is to be considered as further design development in the Stage 3 CSSI). These design refinements have been captured in the amended Building Envelope Drawings (Appendix D) and Parramatta Over and Adjacent Station Development Design Guidelines (Appendix F) which will be implemented during the Detailed SSDA stage.

The intention of the Indicative Reference Scheme is to demonstrate one way in which the proposed building envelopes can be achieved. However, ultimately it will be the future Detailed SSDA(s) which will determine the exact GFA for the site within the parameters of the Building Envelopes and Design Guidelines. While the current Indicative Reference Scheme doesn't accommodate the maximum 176,360m<sup>2</sup> proposed, further design development will be undertaken for the future Detailed SSDA(s), and efficiencies may be achieved enabling the delivery of the full 176,360m<sup>2</sup> GFA.

The Demarcation Drawings - Additional GFA Study (Appendix R) outlines opportunities in which additional GFA can be achieved (above the Indicative Reference Scheme) as part of future Detailed SSDA(s) while being contained wholly within the parameters of the Stage 3 CSSI Approval and the OSD and ASD Concept SSDA Building Envelopes.

These opportunities include:

- further optimisation of the Parramatta metro station infrastructure including:
- optimising the station plant to Buildings C and D by consolidating two station levels into one and reducing the floor-to-floor heights, thereby allowing for additional GFA (additional 5,287m<sup>2</sup>)
- potential removal of future station lot in Building D (additional 1,152m<sup>2</sup>)
- allowance for podium heights for Buildings A and D within the maximum extent permitted under the proposed Building Envelopes and Stage 3 CSSI Approval (additional 523m<sup>2</sup>)

- efficiencies within the building core for Buildings A, C and D (additional 1,936m<sup>2</sup>).

This is appropriate given that compliance in the future Detailed SSDA(s) is to be subject to:

- approved Building Envelope Drawings
- demonstration of design excellence
- consistency with Parramatta Over and Adjacent Station Development Design Guidelines
- conditions of Approval
- a minimum 1:1 FSR for commercial premises for Building B.

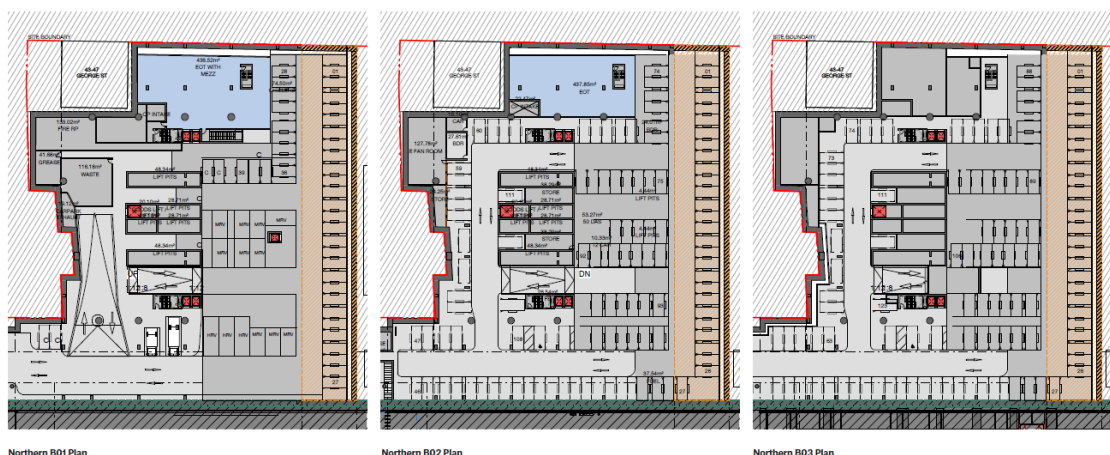
It is noted that the exhibited EIS and accompanying technical reports were based on a GFA of 190,000m<sup>2</sup> and were able to demonstrate that the proposal will have acceptable impacts subject to appropriate mitigation measures being implemented. Furthermore, it is highlighted that the maximum GFA of 176,360m<sup>2</sup> (equivalent to a FSR of 6.92:1, down from 7.45:1 as exhibited) is well below the maximum FSR requirement of 10:1 in the PLEP 2011.

### Car parking numbers

The excavation and construction of the basement for future carparking of the proposed developments is approved by the Stage 3 CSSI Approval. The Concept SSDA seeks consent for a maximum number of 451 car parking spaces. The number of car parking spaces in the Indicative Reference Scheme has been reduced from 455 to 248 to accommodate the realignment of Horwood Place and further design development for the station.

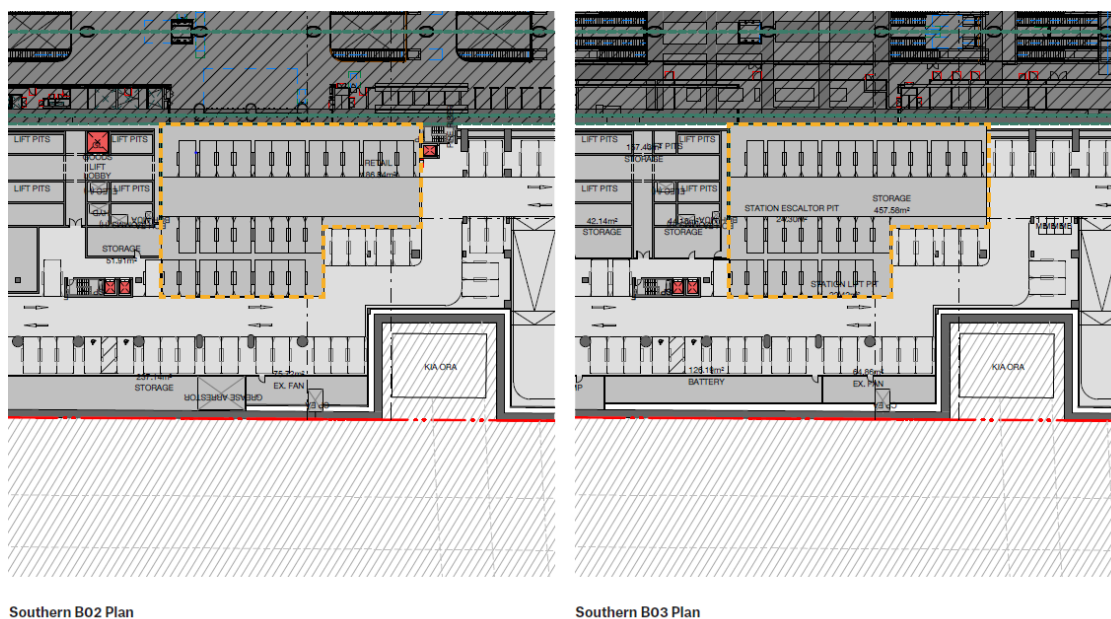
Notwithstanding the refinement to the Indicative Reference Scheme, the proposal seeks a maximum of 451 car parking spaces given this can be achieved within the parameters of the Stage 3 CSSI Approval basement shell. Figure 3-7 below demonstrates that an additional 145 car parking spaces can be achieved within the approved basement shell.

Additionally, the potential removal of the future station lot from the southern basement (which is within the approved basement shell) would result in an additional 58 car parking spaces being achieved as illustrated in Figure 3-8 below. Refer to the Appendix R - Demarcation Drawings for further detail on the additional car parking numbers and location of these areas on the basement plans.



**Figure 3-7 Potential additional car parking under Horwood Place**





**Figure 3-8 Potential additional car parking within future station lot in southern basement**

The future configuration of the basement levels are to be determined in the Detailed SSDA within the parameters of the basement envelope established under the Stage 3 CSSI Approval. Efficiencies may be able to be achieved as part of the Detailed SSDA process, such as improvements to parking configuration from the Indicative Reference Scheme, the achievement of an improved CSSI station design allowing additional space to be provided for parking, and/or the removal of storage areas.

The proposal to retain the maximum of 451 car parking spaces is substantially less parking than allowed when applying the maximum parking rates permissible under the PLEP 2011, which when applied to the maximum GFA of 176,360m<sup>2</sup> results in a total of 550 spaces.

To establish the overall maximum car parking numbers, the residential parking numbers were based on the maximum PLEP 2011 rates (188 spaces) and with an overall total of 451 spaces that would leave 263 spaces for commercial and retail. Based on approximately 164,747m<sup>2</sup> GFA of commercial and retail, the parking rate would be 1 space/626m<sup>2</sup> which is considered to be appropriate for commercial and retail development within proximity to public transport. If the proposal was reduced to the 248 spaces (as per the Indicative Reference Scheme) there would be only 60 spaces for 164,747m<sup>2</sup> GFA of commercial and retail development.

The exhibited Transport and Access Report confirmed that the maximum parking rates would have no adverse impact on the surrounding road network. Furthermore, the Transport and Access Report also included a mitigation measure to prepare a Green Travel Plan for the future Detailed SSDA which will focus on reducing the private car trips and encourage the use of sustainable transport including public transport and active transport modes.

### 3.3.3 Clarifications of the project

The following clarifications of the project are detailed below.

#### Green Star Rating

The Ecological Sustainable Development Report (Appendix S of the EIS) and Chapter 3.10 of the EIS identified that commercial Buildings A, C and D would be categorised as a Grade A commercial office development and have a target rating of 6 star Green Star Buildings rating.

This section is to clarify that to align with a Grade A commercial office development, the minimum Green Star rating requirement for this type of development, and as required under the DCP and LEP Design and As Built tool, is a 5 star Green Star Building. This also aligns with the Property Council of Australia's standards.

Therefore, Buildings A, C and D are to have a minimum target rating of 5 star Green Star. This minimum rating requirement does not preclude a 6 Star rating to be achieved in a future Detailed SSDA, however the minimum requirement of 5 star aligns with the Grade A commercial office development requirements, DCP and LEP requirements.

The 5 star Green Star requirement for Building B (residential) is retained.

### **Adaptive reuse of Kia Ora and George Street shops**

The Stage 3 CSSI Approval identified that an Adaptive Reuse Strategy and Conservation Management Plan would be prepared for the heritage items that would be integrated into the metro station precinct, including the George Street Shops and Kia Ora (refer to CSSI Stage 3 revised environmental mitigation measure EIS-NAH4).

This clarification is to confirm that although the reuse strategy would be prepared under the Stage 3 CSSI Approval, concept approval for the reuse of these items forms part of the scope of this Concept SSDA proposal.

The Historical Heritage Report (Appendix V) in the exhibited EIS addressed the adaptive reuse of Kia Ora and the George Street shops and recommended a mitigation measure to guide the adaptive reuse in the future Detailed SSDA(s). These mitigation measures have been amended in the Addendum Historical Heritage Report (Appendix M) and confirm that:

- A suitably qualified heritage architect is to be engaged in the development of future building design of the new buildings and the adaptive reuse of the heritage structures, including addressing details concerning the interface between the various heritage items and future development.
- The Adaptive Reuse Strategy and Conservation Management Plans (CMP) prepared for Shops (I703) and Kia Ora (I716) prepared under the Stage 3 CSSI are required to be considered in the Detailed SSDA(s) for the site.

Whilst the Historical Heritage Report addressed the adaptive reuse of the heritage items, it was not specified in the EIS and other supporting documents that this was included in the scope of works for the Concept SSDA. To clarify that this is included, the following items reinforce this:

In summary, concept approval for the adaptive reuse of the heritage items is included in the Concept SSDA, while the Adaptive Reuse Strategy and CMP prepared under the CSSI Stage 3 approval will provide the framework for undertaking the adaptive. Future Detailed SSDA(s) will provide further design detail in accordance with the Parramatta Over and Adjacent Station Development Design Guidelines (Appendix F) and the mitigation measures provided at Appendix B, including:

- Implement the advice of a suitably qualified heritage architect in the development of future building design and the adaptive reuse of the heritage structure (Building A) and Kia Ora (Building D)
- The Adaptive Reuse Strategy and Conservation Management Plans (CMP) prepared for Shops (I703) and Kia Ora (I716) prepared under the Stage 3 CSSI are required to be considered in the Detailed SSDA(s) for the site
- Detailed SSDA(s) are to provide specific guidelines for development within the building envelope and its interface with the heritage structure.

## Maximum GFA

It is clarified that a reduced maximum GFA of 176,360m<sup>2</sup> is sought under the Concept SSDA. The 176,360m<sup>2</sup> Concept SSDA GFA excludes the station infrastructure GFA approved under the Stage 3 CSSI Approval.

## Estimated station infrastructure GFA

The station infrastructure that has been conceptually approved under the CSSI Approval has an estimated GFA of 5,421m<sup>2</sup>. The station infrastructure has been calculated using the standard GFA definition under the PLEP 2011 and is considered to be a genuine estimate.

However, given the final design for the station is subject to further refinement, an extra 15% has been added to the GFA for this component of the development to allow for design tolerance and refinement of the station design, totalling 6,234m<sup>2</sup>.

If the station infrastructure GFA is added to the total GFA calculations for the Concept SSDA, it would result in an overall GFA of 182,594m<sup>2</sup>. The overall GFA would result in a FSR of 7.17:1 which is well below the FSR control of 10:1 under the PLEP 2011.

## Provision of shop top housing and residential accommodation

In relation to Building B, it is noted that shop top housing developments are permitted in Zone B4 Mixed Use under the *Parramatta Local Environmental Plan 2011* (PLEP 2011).

Additionally, it is also noted for completeness that residential accommodation is also permitted more broadly for the Concept SSDA site under Clause 2.94 of the *State Environmental Planning Policy (Transport and Infrastructure) 2021* (Transport and Infrastructure SEPP) where it is within a rail corridor and the development is wholly or partly above a railway station.

### 3.3.4 Refinement to the description of the proposal

To align with the refinements and clarifications and for consistency with the amended Building Envelope Drawings, the description of the Concept SSDA has been updated. The text deleted is shown as ~~strikethrough~~ and new text is in **bold**:

The proposal seeks concept approval for ~~four building envelopes above and adjacent to the Parramatta metro station. Specifically, consent is sought for the following:~~

- maximum gross floor area of ~~490,000~~ **176,360m<sup>2</sup>** (excluding station infrastructure GFA that was approved under the Stage 3 CSSI Approval), comprising:
- ~~48,900~~ **11,613m<sup>2</sup>** for residential accommodation
- ~~463,250~~ **158,752m<sup>2</sup>** for commercial
- ~~7,850~~ **5,995m<sup>2</sup>** for retail
- maximum building envelopes, heights and land uses for:
- Building A – up to RL 172.7 (approx. 38 storeys) for commercial and retail uses
- Building B – up to RL 130.0 (approx. ~~33~~ **30** storeys) for **commercial, retail and residential** and retail uses ~~above a podium that incorporates a station infrastructure~~ **infrastructure** (which is subject to separate infrastructure application SSI 22765520)
- Building C – up to RL 135.5 (approx. 26 storeys) for commercial and retail uses ~~above a podium that incorporates station services infrastructure~~ **infrastructure** (which is subject to separate infrastructure application SSI 22765520)

- Building D – up to RL 127.4 (approx. 24 storeys) for commercial and retail uses ~~above a podium~~ that incorporates **station infrastructure** (which is subject to separate infrastructure application SSI 22765520)
- maximum of ~~455~~ **451** car parking spaces
- adaptive reuse of the existing Kia Ora and George Street Shops heritage items for commercial premises

Beyond those impacts previously identified within the EIS, there will be no additional impacts as a result of the refinements and clarifications to the proposal. The amendments to the description of Buildings B and D are minor and are a result of further design development. The refinements include additional measures where necessary to ensure any potential impacts are appropriately managed and mitigated.

## **4 Response to submissions**

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### **4.1 Local council and government agency advice**

The following sections includes responses to the advice provided by government agencies and Council. The issues raised are addressed in tables with the advice received provided in the left-hand column and corresponding response by Sydney Metro provided in the right-hand column.

#### 4.1.1 City of Parramatta Council

The advice provided by Council and Sydney Metro's response is provided in Table 4-1.

**Table 4-1 Response to Council advice**

No.	Issue raised	Applicant response
<b>1. Civic Link, New Horwood Place and Public Domain</b>		
<p><b>1.1 Guidelines and Public Domain</b></p>	<p><u>Recommendation 1</u>: Sydney Metro West Parramatta Over &amp; Adjacent Station Development Design Guidelines are developed in collaboration with the City of Parramatta to ensure continuity with the City's Civic Link Design Brief and to develop a coordinated design with Country approach within the public domain and with the First Nations People.</p>	<p>Sydney Metro is continuing to consult and meet with Council on the design of the public domain. Meetings between Sydney Metro and Council have occurred in November 2022, December 2022, February 2023, and June 2024.</p> <p>The public domain and Civic Link form part of the Stage 3 CSSI Approval, and do not form part of the proposed development. The Stage 3 CSSI Conditions of Approval E70, E71 and E72 require the preparation of Station Design and Precinct Plans (SDPPs), which document and illustrate the design of the permanent built works and landscape design of each metro station precinct and how they are to be maintained. This includes features approved under the Stage 3 CSSI including the permanent public domain and Civic Link (between George Street and Macquarie Street), roads and podiums of Buildings B, C and D.</p> <p>The Updated Design Guidelines include guidance on Connecting with Country as it relates to the SSSA components.</p> <p>Sydney Metro West's Connect with Country Working Group has prepared a Connect with Country Report which includes all stations across the alignment. A copy of this report is available here: <a href="https://www.sydneymetro.info/sites/default/files/2023-01/Connect_with_Country_Guide_1.pdf">https://www.sydneymetro.info/sites/default/files/2023-01/Connect_with_Country_Guide_1.pdf</a></p>

No.	Issue raised	Applicant response
		<p>The Working Group and Sydney Metro's Design with Country consultant have advised on Parramatta metro station reference design. The Connecting with Country Working Group and a Design with Country consultant will guide the continued design development of the project. The Designing with Country approach for the final public domain design including Civic Link will be documented in the SDPP as required by the Stage 3 CSSI Approval.</p> <p>Sydney Metro met with Council on 27 March 2024, 25 June 2024 and 9 August 2024 to discuss Council's submission and comments related to the Parramatta Over and Adjacent Station Development Design Guidelines (Appendix F) as well as brief Council on the Sydney Metro West Design Excellence Approach. This included discussion on the updates to the Design Guidelines based on feedback from City of Parramatta Council, and an overview of how Council will be involved during detailed design of the precinct.</p> <p>In addition to this, the updated Parramatta Over and Adjacent Station Development Design Guidelines were sent to Council on 19 June 2024 to review.</p> <p>A more detailed response to this item is provided within Section 3.2 of the Addendum Built Form and Urban Design Report (Appendix E).</p>
	<p><u>Recommendation 2:</u> The Building envelope drawings and Design Guidelines are amended in accordance with the Parramatta CBD Development Control Plan 2021 to addresses the Spatial Layout of the Public Domain within the Metro project boundary, including:</p> <ul style="list-style-type: none"> <li>• Street Types and their dimensions and functions.</li> <li>• Lanes and their dimensions and functions.</li> <li>• Public Squares and their key dimensions, character and uses; and</li> </ul>	<ul style="list-style-type: none"> <li>• The streets, lanes, public domain (including the Civic Link between George Street and Macquarie Street), and the extent of basements form part of the Stage 3 CSSI Approval. The Concept SSDA building envelopes and Design Guidelines align and integrate with these components of the public domain.</li> <li>• Sydney Metro's aspirations for the public domain aligns with Council's and the new PDCP 2023 (noting that the PDCP 2011 was in force when the Concept SSDA was lodged prior 18 September 2023, and is the relevant applicable DCP for this application). The Parramatta metro station precinct would continue to be designed in consultation with Council in accordance with Condition E56 of the Stage 3 CSSI Approval.</li> </ul>

No.	Issue raised	Applicant response
	<ul style="list-style-type: none"> <li>Basements Extents &amp; Deep Soil under the public domain, including streets and lanes</li> </ul> <p>Council's 2017 Civic Link Framework Plan sets out an aspiration for the Civic Link to address broader City issues, including urban heat, flood, public transport, active travel, as well as opportunities for Parramatta's cultural offering and identity. These aspirations extend to the enlarged public domain proposed by Metro with the addition of Welcome Square and the temporary public space to the north.</p>	<ul style="list-style-type: none"> <li>It is noted that conditions E70 to E72 of the Stage 3 CSSI Approval require Sydney Metro to prepare Station Design and Precinct Plans which need to include the final design of the station, public domain (including the Civic Link) and roads.</li> <li>Since the public exhibition of the Concept SSDA, Sydney Metro has met with Council on eight separate occasions to workshop issues relating to the design of the Parramatta metro station precinct including: <ul style="list-style-type: none"> <li>the spatial layout of the public domain configuration</li> <li>street types and their dimensions and functions</li> <li>lanes and their dimensions and functions</li> <li>public squares and their key dimensions, character and uses</li> <li>basements extents and deep soil under the public domain, including streets and lanes.</li> </ul> </li> </ul> <p>Sydney Metro will continue to engage with Council on the detailed design of the public domain.</p> <p>A more detailed response to this item is provided within Section 3.2 of the Addendum Built Form and Urban Design Report (Appendix E).</p>
	<p><u>Recommendation 3</u>: The Design Guidelines set objectives and guidance for public domain performance requirements in consultation with City of Parramatta for:</p> <ul style="list-style-type: none"> <li>Water Management, including WSUD and overland flow paths.</li> <li>Minimum tree canopy cover and deep soil volumes.</li> <li>Public Art and Heritage Interpretation.</li> <li>Spaces for Events &amp; Programming; and</li> </ul>	<p>Sydney Metro met with Council on 27 March 2024, 25 June 2024 and 9 August 2024 to discuss the delineation between the Sydney Metro West Station and Precinct Design Guidelines and the Parramatta Over and Adjacent Station Development Design Guidelines (Appendix F).</p> <p>The public domain forms part of the Stage 3 CSSI Approval, and design guidance related to the public domain is included in the Sydney Metro West Station and Precinct Design Guidelines (refer to Appendix M of the Submissions Report for the Stage 3 CSSI Approval). Section 4 of the Sydney Metro West Station and Precinct Design Guidelines provides guidance and requirements for station precincts, and Section 5.2 provides place-specific design elements for Parramatta metro station.</p>



No.	Issue raised	Applicant response
	<ul style="list-style-type: none"> <li>• Movement &amp; Circulation for all users.</li> <li>• Public domain elements including furniture, paving, lighting, wayfinding, and smart city elements.</li> </ul> <p>The Guidelines are incomplete and do not adequately address the interrelated place outcomes across both development and public domain.</p> <p>Building C and the eastern metro entrance location, which appears to be sited within the extension of Macquarie Lane, are not sufficiently described with contradictory outcomes shown in different parts of the documentation. The encroachment of the Metro station into the public domain of Macquarie Lane is not accurately assessed for pedestrian circulation and the relationship to the Roxy. The street wall height of Building C at Macquarie Lane and Civic Link does not align with Council DCP and an alternative approach is not justified.</p> <p>Skylights to the Metro station are shown notionally in one diagram. These could have a negative impact the functionality of the public space.</p> <p>Heritage items are only addressed in part in relation to the proposed street wall heights. The alignment of towers and their visual setting for heritage items is not sufficiently addressed. Kia Ora is only addressed as a potential for an adaptive reuse and addition to the rear. The setting of the Roxy and Kia Ora are not adequately addressed in the documentation.</p>	<p>The Building C eastern station entrance forms part of the Stage 3 CSSI Approval and does not fall within the Concept SSDA scope, as further discussed in the Addendum Built Form and Urban Design Report (Appendix E).</p> <p>Any architectural treatments to the station infrastructure such as the use of skylights form part of the Stage 3 CSSI Approval and their design and location will continue to be developed in consultation with the Design Review Panel (DRP) and addressed in the SDPP as required by the Stage 3 CSSI Approval. Detailed design of the Parramatta metro station precinct would be developed in consultation with Council as required under Condition E56 of the Stage 3 CSSI approval.</p> <p>The Parramatta Over and Adjacent Station Development Design Guidelines (Appendix F) have been updated to provide additional guidance on the heritage significance and adaptive reuse of Kia Ora and the George Street shops.</p> <p>Future assessment of the integration of the built form with the public domain will form part of future Detailed SSDA(s).</p> <p>A more detailed response to this item is provided within Section 3.2 of the Addendum Built Form and Urban Design Report (Appendix E).</p>

No.	Issue raised	Applicant response
	<p><u>Recommendation 4</u>: The building envelope drawings and Design Guidelines are amended to include all proposed buildings, their interface with the public domain and heritage buildings.</p>	<p>The Building Envelope Drawings (Appendix D) and Parramatta Over and Adjacent Station Development Design Guidelines (Appendix F) have been updated to reflect the design refinements and clarifications made since lodgement of the Concept SSDA EIS.</p> <p>A more detailed response to this item is provided within Section 3.2 of the Addendum Built Form and Urban Design Report (Appendix E).</p>
<p><b>1.2 New Horwood Place Alignment</b></p>	<p><u>Recommendation 5</u>: The alignment of Horwood Place be straightened with a straight 14m street reservation width to accommodate parking, footpaths and tree planting along both sides of the street and to ensure Kia Ora has an appropriate curtilage and setting.</p>	<p>During design development for the Parramatta metro station precinct, the design of Horwood Place has been straightened and widened in response to this recommendation, providing an appropriate curtilage and setting to Kia Ora for future adaptive re-use. Public domain elements including Horwood Place and the Civic Link forms part of the Stage 3 CSSI Approval scope, which will continue to be developed in consultation with Council as required under the Stage 3 CSSI Approval.</p> <p>To accommodate the revised Horwood Place alignment, the 3 m podium articulation zone along the eastern elevation of Building A has been removed as part of this Concept SSDA. Any design refinements to the articulation zone for Building D podium (which is to be constructed under the Stage 3 CSSI Approval) will also be addressed during detailed design for the Stage 3 CSSI Approval. Refer to Section 3.3.1 above for further detail.</p> <p>A more detailed response to this item is provided within Section 3.3 of the Addendum Built Form and Urban Design Report (Appendix E).</p>
<p><b>1.3 Soil depth and tree planting to public spaces</b></p>	<p><u>Recommendation 6</u>: The building envelope drawings and Design Guidelines are amended to set out below ground development extents in relation to the finished level of the public domain at ground and include soil depth and utilities/service requirements above structures</p>	<p>Public domain and soil depths are subject to the Stage 3 CSSI Approval. Sydney Metro has held a number of collaborative workshops with the City of Parramatta Council to discuss landscape and public domain within the Parramatta metro station precinct, including soil depth requirements. Further, the Stage 3 CSSI approval requires the design of Civic Link to consider the provision of areas of adequate deep soil depth and volume to allow for planting of large trees; and the depth of services to enable access from above for future asset service or maintenance activities where they are located above the underground station structures (refer to Condition E60 of the Stage 3 CSSI approval).</p>

No.	Issue raised	Applicant response
		<p>The design development of the Stage 3 CSSI Approval includes the relocation of the southern basement loading dock from beneath the public domain to below the eastern paved areas of the Civic Link and Building C, which would enable soil volume to be significantly expanded.</p> <p>A more detailed response to this item is provided within Section 3.4 of the Addendum Built Form and Urban Design Report (Appendix E).</p>
<p><b>1.4 Adjacent site access</b></p>	<p><u>Recommendation 7</u>: Additional information is to be provided that shows how vehicle and service access is provided for properties adjacent Metro for both existing fragmented development and for future development under Council's LEP/DCP.</p>	<p>The neighbouring sites to the north-east corner includes 71 George Street and 73-75 George Street. These sites abut the public domain area which form part of the Stage 3 CSSI Approval and are not covered in the Concept SSDA.</p> <p>Current access to 71 George Street is via Macquarie Lane through the former at-grade carpark (owned by Sydney Metro) adjacent to the Roxy Theatre. The Concept SSDA maintains loading access to both the Roxy and 71 George Street. Alternatively, 71 George St could be front loaded off George Street, reducing the number of vehicles accessing the former car park down and improving pedestrian safety within Macquarie Lane.</p> <p>73-75 George St has an existing driveway entrance off Smith St. There are no access/egress points to this development along the western side. There is no timeline on the amalgamation and redevelopment of these sites envisaged under the PDCP 2023 and Civic Link Draft Design Brief.</p> <p>The neighbouring sites to the north-west (240 Church Street, and 244 Church Street &amp; 37-39 George Street) currently utilise a temporary loading and parking spaces within the Sydney Metro site accessed from George Street.</p> <p>Section 4.5.2 of the PDCP 2023 identifies the neighbouring sites to the north-west as part of Site 04 and anticipates they will be amalgamated to enable future development in accordance with PLEP 2023. If amalgamated and redeveloped, Section 4.5.2 of the PDCP 2023 envisages Site 04 to be serviced by a shared service lane which is provided along the boundary off Site 04 and the Sydney Metro site. The Concept SSDA enables this future shared service lane to be created following the amalgamation and redevelopment of Site 04.</p>

No.	Issue raised	Applicant response
		<p>If Site 04 is not amalgamated prior to the delivery of the built form, opportunities for loading and vehicle access to the neighbouring sites during construction and following development has been considered as part of the Addendum Built Form and Urban Design Report (Appendix E) and Updated Indicative Reference Scheme (Appendix I). It includes an interim access platform while the northern basement is being constructed and option for front loading from George Street following completion of the northern basement. Further detail on this matter will be provided as part of future detailed SSDAs.</p> <p>A more detailed response to this item is provided within Section 3.4 of the Addendum Built Form and Urban Design Report (Appendix E).</p> <p>Furthermore, the Parramatta Over and Adjacent Station Development Design Guidelines (Appendix F) illustrates the end state of vehicle access to the north-eastern properties which allows for vehicle access from George Street and Macquarie Street via United Lane and is consistent with PDCP 2023.</p>
<p><b>1.5 Building envelopes</b></p>	<p><u>Recommendation 8</u>: The Building Envelope Drawings and Design Guidelines be amended for Building A and C to address heritage curtilages and setbacks and separation with existing and future adjacent development.</p>	<p>Detailed diagrams of the setbacks and separation to the George Street shops is provided in the Addendum Built Form and Urban Design Report (Appendix E).</p> <p>The heritage interface zone has been developed as part of the Adaptive Reuse Strategy and Conservation Management Plan for the George St shops prepared under the Stage 3 CSSI Approval. The Parramatta Over and Adjacent Station Development Design Guidelines (Appendix F) have been developed in response to significant views and the visual catchment which includes consideration for the surrounding heritage items. The Adaptive Reuse Strategy and Conservation Management Plan are to inform future adaptive reuse and will be prepared as part of Stage 3 CSSI requirements.</p> <p>With regards to the separation between Building C and 25 Smith Street, Building C has been designed to mirror the core arrangement of 25 Smith Street, positioning lifts and service areas along the floorplate's eastern edge so that non habitable facades would face each other, as consistent with the Parramatta DCP.</p>

No.	Issue raised	Applicant response
<b>1.6 Roxy Theatre</b>	<u>Recommendation 9</u> : Sydney Metro West need to consider the requirement for Roxy Theatre to have an active frontage to Macquarie Lane in their planning and in relationship to their station entry, structure and building C canopy.	<p>The Roxy Theatre is outside the ownership and scope of Sydney Metro. The Building C podium and public domain areas including Macquarie Lane fall under the Stage 3 CSSI Approval. The relationship between the Roxy Theatre and the station infrastructure at Building C is provided in the Sydney Metro West Station and Precinct Design Guidelines, prepared under the Stage 3 CSSI Approval.</p> <p>A more detailed response to this item is provided within Section 3.7 of the Addendum Built Form and Urban Design Report (Appendix E).</p>
<b>2. Design Excellence</b>		
	<u>Recommendation 10</u> : Review of the Design Excellence strategy via a Clause 7.12 requirements of PLEP 2011 and appropriate justification if the review is contrary to these requirements.	<p>The integrated nature of designing the metro station network, station precincts, OSD and ASD requires a coordinated commitment to embedding design excellence throughout the lifecycle of the design process.</p> <p>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 DEX Strategy was endorsed by the Government Architect NSW in August 2022 (and sets out how design excellence is considered from inception of ideas and concepts that define expectations, through design development and procurement to delivery.</p> <p>The competitive selection process outlined in the DEX Strategy is a competitive design procedure approved by the Planning Secretary and meets the requirements of Clause 7.12 of the PLEP 2011.</p> <p>Refer to further discussion at Section 5.3 below.</p>

No.	Issue raised	Applicant response
<b>3. Proposed variation under clause 4.6 of PLEP 2011</b>		
	<p>Appendix II of the EIS documentation relates to a Clause 4.6 variation request seeking to justify contravention of the development standard set out in Clause 7.24 – ‘Commercial premises in Zone B4 Mixed Use’ of PLEP 2011. The standard relates to the minimum floor space ratio required for the purposes of commercial premises, in this instance for Building B which is in the B4 – Mixed use zone.</p> <p>The nominal site area for Building B is 2,470m<sup>2</sup>. Clause 7.24(3)(b) requires a gross floor area equal to a floor space ratio of at least 1:1 to be provided for commercial premises at Building B, equating to a minimum commercial GFA requirement of 2,470m<sup>2</sup>.</p> <p>The Concept SSDA seeks approval for 1,114m<sup>2</sup> of commercial (retail) GFA within Building B, which is less than the 2,470m<sup>2</sup> (i.e. FSR 1:1) required, necessitating this clause 4.6 variation. This is a variation of more than 5% for the commercial space shortfall in Building B.</p> <p>Council cannot legally support this variation as this contravenes Clause 4.6(8)(ca) of PLEP 2011, which caps any floor space variation at 5%. This is a very significant issue for Sydney Metro West and has not been addressed.</p>	<p>The proposal has been refined to comply with the minimum 1:1 commercial floor space ratio requirement and amended scheme incorporates 1:1 (or 2,616m<sup>2</sup> of GFA) for Building B (refer to Section 3.3.1 above).</p> <p>In this regard the Clause 4.6 Variation Request is to be removed from the Concept SSDA as it is no longer required.</p> <p>Refer to further discussion at Section 5.1 below.</p>

No.	Issue raised	Applicant response
<b>4. Cycle and pedestrian access</b>		
<b>4.1 Bicycle parking and end of trip facilities</b>	<p><u>Recommendation 11:</u> Access to end of trip facilities is to be via a ramp in line with AS2890.3 and within 1 floor of the ground plane. Stair access with wheeling ramps is strongly discouraged. AS2980.3 states “All bicycle parking should be accessible from a road, driveway or footpath via a bicycle-friendly access path”.</p>	<p>The detailed design of the end of trip facilities including the accessibility to both the end of trip facilities and carpark will form part of future Detailed SSDA(s). The design will be compliant with AS2890 series Australian Standards.</p> <p>The bicycle locations in the Indicative Reference Scheme have been placed as close to ground as possible within station and precinct requirements.</p> <p>A more detailed response to this item is provided within Section 3.9 of the Addendum Built Form and Urban Design Report (Appendix E).</p>
	<p><u>Recommendation 12:</u> The east west link between Macquarie Lane and Church Street be cycle friendly.</p>	<p>Part of the east-west link was approved under the Stage 3 CSSI Approval and does not form part of the proposed development. The east-west link is intended to be a pedestrian laneway.</p> <p>There would be no desire for cyclists to continue west to Church St from the Civic Link as this street is to become a tram only corridor where cycling is prohibited due to the Parramatta Light Rail.</p> <p>Interchange Access Plans would be developed under Condition of Approval E124 of the Stage 3 CSSI Approval for the metro station precinct to inform the final design of transport, access and service facilities. This would consider the interface between the station precinct and developments. The Interchange Access Plans would be prepared in consultation with the Traffic and Transport Liaison Group established under the CSSI Approval (which would include representation from Council).</p> <p>A more detailed response to this item is provided within Section 3.9 of the Addendum Built Form and Urban Design Report (Appendix E).</p>

No.	Issue raised	Applicant response
<p><b>4.2 Pedestrian Facilities</b></p>	<p><u>Recommendation 13</u>: A raised pedestrian crossing shall be provided in George Street and within Civic Link as per Council requirements subject to Council approval</p>	<p>A signalised pedestrian crossing in George Street was included in the indicative design of the Stage 3 CSSI Approval. Sydney Metro would continue to develop the design of the Parramatta metro station precinct, including preparing Interchange Access Plans under Condition of Approval E124 of the Stage 3 CSSI Approval. These plans would inform the final design of transport, access and service facilities around the metro station. The Interchange Access Plans would be prepared in consultation with the Traffic and Transport Liaison Group established under the CSSI Approval (which would include representation from Council). Sydney Metro is engaging with the City of Parramatta Council in relation to the Civil Link Block 3 design to ensure the locations of a future raised pedestrian crossing is coordinated.</p>
<p><b>5. Flooding and Stormwater</b></p>		
<p><b>5.1 Flooding</b></p>	<p>An electronic copy of all Drainage and Flood Models together with a copy of flood report must to be provided to Council for review. The design of the stormwater pit and pipe network should be modelled in DRAINS and all flood modelling should be undertaken using TUFLOW. It should include Pre and Post Development scenarios along with impact analysis and mapping. The models should be peer reviewed by independent flooding expert consultants.</p>	<p>The ‘baseline’ scenario for the Concept SSDA is established under the Stage 3 CSSI Approval which includes the station infrastructure, basements and podiums for Buildings B, C and D while the ‘development’ scenario includes Building A. Once the successful tender for the station is awarded, they will need to undertake further design development and use the Parramatta River Flood Study model and the latest version of the Australian Rainfall and Runoff (ARR) as a basis for the flood model. This updated flood model would then be used to determine the ‘baseline’ scenario for the Detailed SSDA.</p> <p>Given the flood model is to be updated for the Detailed SSDA and relies on further updates to the Stage 3 CSSI flood model, it is not considered necessary to provide it to Council at this stage of the process.</p> <p>The exhibited Integrated Water Management Plan (EIS Appendix W) and the Addendum Integrated Water Management Plan (Appendix P) describe the drainage design for the proposal which was undertaken using DRAINS. It is anticipated that any future design revisions required to support design changes would also use DRAINS.</p>



No.	Issue raised	Applicant response
		<p>The hydraulic flood models adopted for the assessment of the proposed development site were originally developed for Transport for NSW by Arup as part of the Parramatta Light Rail project, and was undertaken using TUFLOW, as noted in the exhibited Flooding Assessment (Appendix T of the EIS). The pre and post scenarios have been provided in the exhibited Flooding Assessment and concludes there will be no meaningful change in flood behaviour through the site and the baseline and proposed developed scenarios have been assumed to be the same. The pre and post scenarios are to be updated for the Detailed SSDA.</p> <p>A more detailed response to this item is provided within Section 2.2.1 of the Addendum Flooding Report (Appendix L).</p>
	<p>Underground drainage to Smith Street may need upgrading and detailed investigation needs to be undertaken to provide safe access to Civic Link and Metro Station in relation to flooding. There is an opportunity to utilise Civic Link as an additional underground stormwater system with safe overland flow to mitigate the existing flooding situation in surrounding areas including Macquarie St and Smith St. It is recommended that Sydney Metro consider this opportunity and ensure the overland flow/ improved drainage through the site is achieved in design so that there is no adverse flood impact to Parramatta Light Rail in Macquarie St or any other property due to this development</p>	<p>Additional drainage systems would be provided within the Civic Link (as part of the Stage 3 CSSI Approval), supplemented by the inclusion of onsite detention arrangements in Building C.</p> <p>The Addendum Integrated Water Management Plan (Appendix P) quantifies that the proposed drainage design represents an improvement over the current Council drainage network as the post development flow is less than the pre-development flow.</p> <p>A more detailed response to this item is provided within Section 2.2.2 of the Addendum Flooding Report (Appendix L).</p>

No.	Issue raised	Applicant response
	<p>There is sag point at Macquarie Street (at close proximity to Building C) where water is expected to pond in the 1% AEP flood event. The flood levels available from other studies undertaken for sites such as 3PS (Parramatta Square) refer to a flood level of approximately 10.4m AHD at this point. In Parramatta Square study the depth of water ponding at Macquarie Street in the 1% AEP event is approximately 0.75 to 1.0m deep whereas the Appendix T – Flooding Report, September 2022 (figure A-02) shows there is minimal flooding on the street. Refer to Figure 5 with annotations below. This is different from the Flooding figure under Chapter 8.4 of Appendix E- Built form and urban Design report from the EIS documentation. The drainage capacity is limited on the street and therefore it must be further investigated to ensure a realistic representation of flood behaviour. Site survey must be utilised in the flood models, as LIDAR may have limited accuracy.</p>	<p>Additional drainage systems would be provided within the Civil Link (as part of the Stage 3 CSSI Approval), supplemented by the inclusion of onsite detention arrangements in Building C.</p> <p>Council’s comment in relation to modelling associated with other Development Applications is acknowledged however without access to these models the differences cannot be further investigated. As noted above, flooding assessment for future Detailed SSDA(s) will utilise the adopted PRFS model as this would provide improved consistency across proposals.</p> <p>A more detailed response to this item is provided within Section 2.2.3 of the Addendum Flooding Report (Appendix L).</p>
	<p>The Macquarie Street drainage system has been updated recently due to drainage works conducted by the Parramatta Square development and drainage works by Parramatta Light Rail along Macquarie Street in conjunction with the upgrade of the drainage system at Smith Street and Macquarie Street intersection, crossing the Parramatta Light Rail corridor. These upgrade works should be some improvement to the flooding problem at the low point in Macquarie Street for the 5% AEP event, however there may still be flooding in larger storm events and the provision of an additional drainage system and overland flow path through the proposed Civil Link to drain overflows from Macquarie Street in the 1% AEP should also be included in this design.</p>	<p>Noted. Additional drainage systems have been provided within the Civic Link (as part of the Stage 3 CSSI Approval), supplemented by the inclusion of onsite detention arrangements in Building C.</p> <p>A more detailed response to this item is provided within Section 2.2.2 of the Addendum Flooding Report (Appendix L).</p>

No.	Issue raised	Applicant response
	<p>1% AEP Climate change scenario map (Figure 5, and section 5.3.1 Flooding Report, Sep 2022) shows no flooding or ponding which is unlikely given sag location in Macquarie Street and Smith Street drainage being under capacity. Council Flood Map shows flood water within Macquarie Street. Detailed investigation is required and consideration to comment 1 (ii) above should be given and updated statement to be included in EIS document.</p>	<p>As noted above, additional drainage systems have been provided within the Civil Link (as part of the Stage 3 CSSI Approval), supplemented by the inclusion of onsite detention arrangements in Building C. This additional infrastructure has been included in the post-development flood modelling.</p> <p>The Addendum Integrated Water Management Plan (Appendix P) quantifies that the proposed drainage design represents an improvement over the current Council drainage network as the post development flow is less than the pre-development flow.</p> <p>Specifically, along Macquarie Street, the peak flow rate is reduced from 513 (L/s)<sup>2</sup> to 354 (L/s)<sup>2</sup> for a 1% AEP event with climate change allowance as per ARR2019.</p> <p>A more detailed response to this item is provided within Section 2.2.3 of the Addendum Flooding Report (Appendix L).</p>
	<p>Flooding Report, Sep 2022, section 6.2, Paragraph 4 states "For local stormwater flooding a freeboard of 0.3 metre freeboard above internal overland flow paths has been adopted for the Sydney Metro West project area". As per council's current guidelines and current practice the minimum Habitable Finished Floor Level should be set as 1% AEP flood level with climate change plus 500 mm Freeboard. Freeboard less than 500 mm should not be used. The Finished Floor Level should be based on the higher of mainstream Flooding and local flood level allowing for 100% blockage of the underground drainage pipe system. In addition, flood protection up to PMF levels needs to be ensured and demonstrated how it could be achieved. This is more important being a critical infrastructure. Our preference would be to avoid mechanical flood barrier and to design entry levels to protect from all flood events up to and including the PMF.</p>	<p>Council's comments are noted. Station infrastructure including the station entrances and basement access were assessed in the Stage 3 CSSI Approval and do not form part of this application. The Stage 3 CSSI Approval incorporated the freeboard requirements under the Parramatta DCP for the station entries. A freeboard of 0.5 metres has been applied to the 1% AEP flood event to determine the finished floor levels of those buildings.</p> <p>The Building A finished floor levels will be confirmed as part of the design for the future Detailed SSDA.</p> <p>A more detailed response to this item is provided within Section 2.2.4 of the Addendum Flooding Report (Appendix L).</p>

No.	Issue raised	Applicant response
<p><b>5.2 Climate Change Inclusion</b></p>	<p>Flooding Report, Sep 2022, section 3.1 indicates that climate change with RCP 8.5 and Reference Year 2100 has been incorporated in the model. Climate change reference year should be representative of design life/service life of the development. Further, being critical infrastructure, it is important to adopt representative reference year for climate change.</p> <p>It is recommended that further advice is obtained from DPE in relation to the application of climate change and potential to include climate change impact up to 2150.</p> <p>In addition, climate change should be included as design case and mitigation measures should be referenced with the inclusion of climate change.</p>	<p>The Physical Science Basis report (Masson-Delmotte <i>et al</i>, 2021) of the Sixth Assessment by the Intergovernmental Panel on Climate Change (IPCC) assigns greater uncertainty on climate change beyond 2100. Consequently, the year 2100 was adopted to determine climate change uplift in accordance with Australian Rainfall and Runoff (Ball <i>et al</i>, 2019) for the CSSI and Concept SSDA.</p> <p>A more detailed response to this item is provided within Section 2.2.3 of the Addendum Flooding Report (Appendix L).</p>
<p><b>5.3 Defining 'Not Worsening'</b></p>	<p>Flooding Report, Sep 2022, section 3.1 defines 'Not worsen' flooding on properties or infrastructure up to the 1% AEP climate change flood event. 'Not worsen' is defined as:</p> <ul style="list-style-type: none"> <li>• a maximum increase in flood levels of 50 mm</li> <li>• a maximum increase in time of inundation on one hour</li> <li>• no increase in potential soil erosion and scouring from any increase in flow velocity.</li> <li>• A maximum increase in flood levels of 50 mm is not acceptable and should be adopted as below;</li> <li>• 0 mm in residential zoned land</li> <li>• 0 mm in commercial/industrial zoned land</li> <li>• 10 mm in public land</li> </ul>	<p>The Stage 3 CSSI Conditions of Approval apply to the metro station and the provisioning works for Buildings B, C and D. The Stage 3 CSSI conditions define no worsening as:</p> <ul style="list-style-type: none"> <li>• a maximum increase in inundation time of one hour during any flood event up to and including a one (1) per cent Annual Exceedance Probability (AEP) flood event;</li> <li>• a maximum increase of 10 mm in inundation at properties where floor levels are currently exceeded during any flood event up to and including a 1% AEP flood event;</li> <li>• a maximum increase of 50 mm in inundation at properties where floor levels would not be exceeded during any flood event up to and including a 1% AEP flood event; and</li> <li>• no inundation of floor levels which are currently not inundated during any flood event up to and including a 1% AEP flood event.</li> <li>• The 50 mm maximum increase applies to events rarer than the 1% AEP flood event.</li> </ul>

No.	Issue raised	Applicant response
	<p>A maximum increase in flood levels of 50 mm is not acceptable and should be adopted as below:</p> <ul style="list-style-type: none"> <li>• 0 mm in residential zoned land</li> <li>• 0 mm in commercial/industrial zoned land</li> <li>• 10 mm in public land.</li> </ul>	<p>With regards to Building A, the potential impact that Building A has on flood behaviour within the precinct during the PMF event has been considered in the design of the Parramatta metro station and provisioning works under the Stage 3 CSSI Approval. Flood levels, to satisfy metro immunity, were conservatively based on the worst-case flood levels of the with and without Building A scenarios.</p> <p>Flood impacts less than 10mm is typically considered within the model error. It is therefore recommended that 10 mm is the adopted maximum allowable increase for flood events up to and including the 1% AEP flood event.</p> <p>A more detailed response to this item is provided within Section 2.2.5 of the Addendum Flooding Report (Appendix L).</p>
<p><b>5.4 Sensitivity with ARR 1987 Methodology</b></p>	<p>Flood Modelling has been undertaken utilising ARR2019 methodology which seems resulting lower flood levels and flows. As advised in DRAFT Floodplain Risk Manual, 2022, sensitivity analysis with ARR1987 methodology should also be undertaken and appropriate measures to be incorporated.</p>	<p>As discussed in Appendix T Flooding Report of the Concept SSDA, the TUFLOW hydraulic flood models adopted for the assessment of the proposed development site was originally developed for Transport for NSW by ARUP as part of the Parramatta Light Rail Stage 1 EIS. Local catchment inflows were input using the rain on grid approach using Australian Rainfall and Runoff 2019 methods. The TUFLOW models were then adopted by the WSP Aurecon Parramatta Light Rail Infrastructure Join Venture (WSPAJV) and updated as part of detailed design. The WSPAJV models were used to undertake the flood assessment for Stage 3 CSSI and was consequently updated for the Concept SSDA.</p> <p>The 'baseline' scenario for the Concept SSDA is therefore established under the Stage 3 CSSI Approval which includes the station infrastructure, basements and podiums for Buildings B, C and D while the 'development' scenario includes Building A.</p> <p>The Parramatta River Flood Study (which was adopted recently, June 2024) would need to be incorporated into the flood model, and updated design for the CSSI during detailed design of the station precinct incorporated to establish the 'baseline' scenario for the Concept SSDA, before it can be incorporated into the flood model for the 'development' scenario for the proposal, which would occur during detailed design for the Detailed SSDA(s).</p>

No.	Issue raised	Applicant response
		<p>Given the Parramatta metro station construction and proposed development site utilised the underlying WSPAJV models, a site-specific comparative rainfall sensitivity assessment against ARR1987 design rainfall values was not feasible during the assessment. However, mitigation measures and conditions of approval associated with the Stage 3 CSSI Approval would ensure detailed design specifically considers the appropriateness of the applied Integrated Flood Design data, specifically:</p> <ul style="list-style-type: none"> <li>• The flood mitigation measures for podiums for Building B, C and D will be delivered under the Stage 3 CSSI Approval to ensure flooding cannot reach the Parramatta metro station up to the PMF event and are likely to include flood barriers.</li> <li>• In accordance with mitigation measure EIS-HF1 of the Stage 3 CSSI Approval, 'as part of design development, including for drainage infrastructure, consideration would be given to the flood risk at all sites. Design development would include consideration of relevant best practice guidelines.</li> <li>• In accordance with Condition of Approval E2 of the CSSI, the Parramatta metro station precinct must be designed and constructed to not worsen flooding characteristics within and in the vicinity of the CSSI. Not worsen flooding characteristics means the following: <ul style="list-style-type: none"> <li>– a maximum increase in inundation time of one hour during any flood event up to and including a 1% AEP flood event;</li> <li>– a maximum increase of 10 mm in inundation at properties where floor levels are currently exceeded during any flood event up to and including a 1% AEP flood event; a maximum increase of 50 mm in inundation at properties where floor levels would not be exceeded during any flood event up to and including a 1% AEP flood event; and</li> </ul> </li> </ul>

No.	Issue raised	Applicant response
		<ul style="list-style-type: none"> <li>– no inundation of floor levels which are currently not inundated during any flood event up to and including a 1% AEP flood event.</li> <li>• They must be reviewed and endorsed by a suitably qualified and experienced person, who is independent of the project’s design and construction, in consultation with directly affected landowners, DPE Water, DPI Fisheries, SES, and Relevant Councils. Sydney Metro would continue to work with City of Parramatta Council throughout detailed design of the CSSI.</li> <li>• In accordance with Condition of Approval E3 of the CSSI, the CSSI must be designed with the objective of providing station entrances that are flood immune for flood events up to and including the 1 per cent AEP flood level plus freeboard or a PMF event (whichever is higher) through passive design for the operational design life of the CSSI unless otherwise agreed by the Planning Secretary.</li> </ul> <p>Sydney Metro propose to incorporate the adopted Parramatta River Flood Study for consistency (instead of the WSPAJV models which has been used thus far in the planning processes and design phases) which would allow sensitivity testing against the ARR 1987 methodology, during the detailed design for the station in accordance with the conditions of approval of the Stage 3 CSSI Approval. At this stage, the baseline flood environment would be established incorporating the Parramatta River Flood Study which can then be utilised to inform the baseline of the future Detailed SSDA application to assess the inclusion of Building A within the station’s precinct.</p>
<p><b>5.5 Cumulative Impacts</b></p>	<p>EIS document section 2.4 mentions that no significant development proposals, under assessment or approved within the immediate locality that need to be considered from a cumulative impact’s perspective. It doesn’t mention Parramatta Light Rail. It should be included in the assessment under cumulative impacts.</p>	<p>This assessment has been based on the models developed for the Parramatta Light Rail project as outlined in Sydney Metro West Rail infrastructure, stations, precincts and operations Environmental Impact Statement Technical Paper 8: Hydrology, flooding and water quality (Sydney Metro, 2022a) with the baseline accounting for Parramatta Light Rail. Therefore, the assessment accounts for the cumulative impact of the Parramatta Light Rail.</p>

No.	Issue raised	Applicant response
		A more detailed response to this item is provided within Section 2.2.3 of the Addendum Flooding Report (Appendix L).
<b>6. Integrated Water Management Plan</b>		
<b>6.1 Public stormwater and Private Stormwater discharge approach</b>	<p><u>Recommendation 14:</u> A safety in design report is prepared by a suitably qualified professional and submitted to Council for review demonstrating the risks and mitigation measures in place to remove or the reduce the flood risk. It should investigate and implement measures for risks such as automatic flood barriers failure, flood warning failures, the risk of fire during a flood and medical emergencies during a flood etc</p>	<p>The matters identified to be addressed by a safety in design report (flood barriers failure, flood warning failures etc.) are typically considered as part of a Detailed SSDA, as the level of detail required is not within the project scope of a Concept SSDA. Safety in design report/s can be provided with the future Detailed SSDA(s) as appropriate.</p>
	<p><u>Recommendation 15:</u> A copy of the DRAINS model used to develop the Public Domain Internal Catchments Flow calculations must be provided to Council for review.</p>	<p>Detailed DRAINS and MUSIC model results have been included at Section 3 of the Addendum Integrated Water Management Plan (Appendix P).</p>
	<p>Recommendation 16: Detailed drainage plans to be submitted for Council review. The diameter of any pipe and longitudinal grades must be shown on the submitted plans. The minimum permissible gradients are shown in City of Parramatta Design Guidelines (2018). The long section of pipes should also be shown on the drainage plans along with maintenance schedules. The provision of an additional drainage system and overland flow path through the proposed Civil Link to drain overflows from Macquarie Street in the 1% AEP should also be included in this design.</p>	<p>This detail has been provided at Section 3 of the report. Surface gradings and contours have been provided on drainage arrangement plans to show the direction of flow. Existing capacity of drainage system have been assessed, with the results showing decreased post development flows in all directions even with the inclusion of climate change factor. Pipe diameter and longitudinal grades have been included within the drainage package and are designed in accordance with Council's Design Guidelines.</p> <p>A more detailed response to this item is provided within Section 2.1.3 of the Addendum Integrated Water Management Plan (Appendix P).</p>
	<p><u>Recommendation 17:</u> An electronic copy of MUSIC Model must be provided to Council for assessment and review.</p>	<p>Detailed MUSIC modelling has been provided at Section 3.2 of the report. The model has been updated with Parramatta North rainfall data as requested and has been provided to Council.</p>



No.	Issue raised	Applicant response
	<p><u>Recommendation 18</u>: Detailed storm water and flooding design should consider and incorporate the following</p> <p>A maximum increase in flood levels of:</p> <ul style="list-style-type: none"> <li>• 0 mm in residential zoned land</li> <li>• 0 mm in commercial/industrial zoned land</li> <li>• 10 mm in public land</li> </ul>	<p>A more detailed response to this item is provided within Section 2.1.6 of the Addendum Integrated Water Management Plan (Appendix P).</p> <p>Refer to response to item 5.3 Defining ‘Not Worsening’ above.</p>
<b>7. Traffic and Vehicular Access</b>		
<b>7.1 Traffic and Vehicular access</b>	<p>The submitted T&amp;A report indicates that the proposed development will provide 19 parking spaces for delivery vehicles as well as 18 loading bays for SRVs and 8 loading bays for MRVs. Loading and unloading facilities are to be designed in accordance with the requirements of the Australian Standard AS 1890.2:2018. Details are to be illustrated on plans submitted with the final DA.</p>	<p>Noted, the detailed basement car park design will form part of future Detailed SSDA(s). Basement carparks will be designed in accordance with AS1890 series Australian Standards.</p>

No.	Issue raised	Applicant response
<p><b>7.2 Driveway from Smith Street</b></p>	<p>The estimated inbound + outbound in the AM and PM peak for the southern basement are 184. This number exceeds the TfNSW requirements for a Shared Zone which states that Shared Zones must have less than 100 vehicles per hour and less than 1,000 vehicles per day. It is further noted that the main pedestrian entrance for the Metro Station will be located within close proximity to this driveway/shared zone meaning that there will be a significant volume of pedestrians. As such, the proposed vehicle entrance to the southern basement carpark is not considered safe due to the vehicle pedestrian conflict.</p> <p><u>Recommendation 19:</u> The location and type of vehicle entrance must be revised such that the conflict between high vehicle volumes and high pedestrian volumes is removed and separated.</p>	<p>As part of ongoing detailed design under the Stage 3 CSSI Approval, Sydney Metro has now proposed several design refinements that respond to the Civic Link Design Guidelines, and Macquarie Lane is no longer a shared zone. The ongoing design of the lane has a cross section that reflects the Civic Link Framework Plan 2017.</p> <p>A continuous footpath treatment is now proposed along Smith Street, at its crossing of Macquarie Lane. The continuous footpath treatment across Macquarie Lane satisfies the criteria outlined in Technical Direction for Traffic, transport and safety practitioners (TDT 2013/05).</p> <p>A more detailed response to this item is provided within Section 2.1 of the Addendum Traffic and Access Report (Appendix K).</p>
	<p><u>Recommendation 20:</u> It is recommended that an additional access be provided to the southern basement (e.g. either directly from Macquarie Street or the new Horwood Place) in order to facilitate access of the vehicles coming from the north to the southern basement. Delivery and service vehicle access must be maintained to 238-262 Church Street Parramatta.</p>	<p>Sydney Metro has investigated opportunities for additional access points to the southern basement noting access is restricted from Macquarie Street by Parramatta Light Rail.</p> <p>Alternate access from United Lane into the southern basement is restricted by:</p> <ul style="list-style-type: none"> <li>• vehicular swept path requirements</li> <li>• the proposed location of the OSD lift cores</li> </ul> <p>The investigation of additional access points to the southern basement could be investigated as part of the Detailed SSDA development process.</p> <p>A more detailed response to this item is provided within Section 2.1 of the Addendum Traffic and Access Report (Appendix K).</p>

No.	Issue raised	Applicant response
<b>7.3 Macquarie Street and Shared Zones</b>	<u>Recommendation 21</u> : Shared zone within Civic Link between Macquarie Street and George Street is not supported.	As noted above, as part of ongoing detailed design under the Stage 3 CSSI Approval, Sydney Metro has now proposed several design refinements that respond to the Civic Link Design Guidelines, and Macquarie Lane is no longer a shared zone.
	<u>Recommendation 22</u> : It is recommended that a Construction Pedestrian and Traffic Management Plan (CPTMP) report as part of the SSD process to demonstrate how the construction of the proposed development will be managed to ensure that the impact of the construction's activities of the proposed development on the vehicular and pedestrian movements on the operation of the surrounding road network are minimised. The CPTMP report is to be assessed prior to the application determination.	A preliminary CPTMP was provided at Section 4 of the Construction Management Statement at Appendix M of the exhibited EIS. It provided information on construction traffic routes, traffic management and other considerations at a level of detail appropriate for a Concept SSDA.  Further detail will be provided as part of future Detailed SSDA(s) when construction methodology and staging is known. It is anticipated that any the future Detailed SSDA(s) will include the preparation of a CPTMP.

#### 4.1.2 Transport for NSW

The advice provided by Transport for NSW and Sydney Metro’s response is provided in Table 4-2.

**Table 4-2 Response to Transport for NSW advice**

No.	Issue raised	Applicant response
<b>General Comments</b>		
<b>Traffic Model</b>	<p><u>Comment:</u> The report does not include evidence of any model calibration and validation to enable a critical assessment of the traffic impacts to Parramatta Light Rail. When validating the model, Sydney Metro should demonstrate that the model meets the requirements of TfNSW Traffic Modelling Guidelines.</p> <p><u>Recommendation:</u> Sydney Metro should submit details to TfNSW for acceptance, of the baseline conditions where they will be assessed to be satisfactorily validated for the peak time periods of the day, in accordance with the procedures set out in the models’ reference publication. TfNSW requests that the model includes Parramatta Light Rail and that an electronic copy of the SIDRA modelling files for review and verification, to be provided as part of the ‘Response to Submissions’ (RtS).</p>	<p>A SIDRA model calibration report has been provided at Appendix A of the Addendum Traffic and Access Report. The SIDRA analysis includes Parramatta Light Rail traffic arrangements at George Street, Smith Street and Macquarie Street. During the development of the concept scheme, no traffic arrangements or turning movements have changed. The OSD traffic is incorporated into the cumulative impact of the traffic operation and the LOS is operating as C or better in the AM and PM peak. There are no traffic impacts to the Parramatta Light Rail . The proposal does not change any traffic arrangements being implemented for the opening of the Parramatta Light Rail or Sydney Metro Station.</p> <p>Sydney Metro has demonstrated that the models have been calibrated and validated against SCATS (Sydney Coordinated Adaptive Traffic System) data and timings. Sydney Metro have calibrated queue lengths and timings of signals to what was observed at the time. There is no calibration required on the turning volumes.</p> <p>The Base case SIDRA modelling files were provided as part of the Stage 3 CSSI Approval for review. The forecasts analysis has recently been updated and is summarised in Appendix A of the Addendum Traffic and Assessment Report.</p> <p>A more detailed response to this item is provided within Section 3 of the Addendum Traffic and Access Report (Appendix K).</p>

No.	Issue raised	Applicant response
<b>East/West Link</b>	<u>Comment:</u> The east/west link is for pedestrians only and with no vehicular access to or from Church Street.	<p>Part of the east-west link was approved under the Stage 3 CSSI Approval and does not form part of the proposed development. The east-west link is intended to be a pedestrian laneway.</p> <p>There would be no desire for cyclists to continue west to Church St from the Civic Link as this street is to become a Light Rail only corridor where cycling is prohibited due to the Parramatta Light Rail.</p> <p>Interchange Access Plans would be developed under Condition of Approval E124 of the Stage 3 CSSI Approval for the metro station precinct to inform the final design of transport, access and service facilities. The Plans will illustrate the interface between the station precinct and developments. The Interchange Access Plans would be prepared in consultation with the Traffic and Transport Liaison Group established under the CSSI Approval (which would include representation from Council).</p> <p>A more detailed response to this item is provided within Section 3.9 of the Addendum Built Form and Urban Design Report (Appendix E).</p>
<b>Suggested Conditions of Consent</b>		
<b>Parramatta Light Rail</b>	<u>Comment:</u> A construction pedestrian and traffic management plan is to be provided showing the proposed construction vehicle access routes, type of vehicles, frequency of vehicle movements etc for GRCLR's review and comment. Any construction vehicles associated with the proposed development must not park, access through or encroach into the Parramatta Light Rail corridor without prior consultation with and approval by GRCLR. This applies to throughout the Parramatta Light Rail construction, T&C and operations phases.	<p>These comments are noted. The Construction Pedestrian and Traffic Management Plan will be developed as part of future Detailed SSDA(s). It is noted that the Concept SSDA does not create an impact or jeopardise the safety, operations or maintenance of the Parramatta Light Rail services and activities as it only seeks concept consent for proposed land uses, maximum building envelopes, maximum building heights, maximum Gross Floor Area (GFA), and maximum car parking rates.</p> <p>The solar reflectivity of the buildings will be considered and assessed as part of the future Detailed SSDAs which will include detailed designs and materiality of the buildings.</p>

No.	Issue raised	Applicant response
	<p>Similar to the comment above, any permanent vehicle access in the end state of the proposed development must not impact or jeopardise the safety, operations or maintenance of the Parramatta Light Rail services and activities. No parking, access through or encroachment into the Parramatta Light Rail corridor by any vehicles (including private, commercial and maintenance etc) will be permitted without prior consultation with and approval by GRCLR. No vehicle access to be allowed along Church Street from south of Lennox Bridge to Macquarie Street in particular.</p> <p><u>Recommendation:</u> GRCLR's consultation and approval must be sought for any ROL applications related to this proposed development site including its construction stage and end state.</p> <p>Parramatta Light Rail track settlement monitoring would need to be conducted by Sydney Metro to ensure that the Parramatta Light Rail tracks would not be impacted as a result of the construction / demolition works associated with the proposed development.</p> <p>No signalised pedestrian crossings shall be installed without prior consultation with and approval by GRCLR as the Parramatta Light Rail operations, in particular the journey times, could be impacted by extra waiting times which have not been foreseen or factored in for the Parramatta Light Rail.</p>	

No.	Issue raised	Applicant response
	<p>There needs to be a “Solar Reflectivity Assessment” carried out for the proposed development to demonstrate that the visibility of the tram drivers in Parramatta Light Rail trams running in both directions along the Parramatta Light Rail alignment would not be impacted as a result of solar reflectivity / glares from the proposed development.</p>	
<p><b>Green Travel Plan</b></p>	<p><u>Comment:</u> TfNSW’s Travel Demand Management (TDM) team have reviewed the Parramatta Over and Adjacent Station development Transport and Access Report prepared by Sydney Metro West (October 2022) and can provide the following comments.</p> <p><u>Recommendation:</u> Further, from the SEARS compliance Table (Table 1.1 Transport and Accessibility Impact Assessment report) asks for a Green Travel Plan (GTP) to be implemented:</p> <p>“proposals to promote sustainable travel choices for employees, residents, guests and visitors, such as connections into existing walking and cycling networks, minimising car parking provision, encouraging car share and public transport, providing adequate bicycle parking and high quality end-of-trip facilities, and implementing a Green Travel Plan.”</p> <p>TfNSW asks that a GTP is prepared and implemented for the Over and Adjacent Station Development.</p>	<p>Noted. Green Travel Plans will be developed as part of future Detailed SSDA(s).</p>

No.	Issue raised	Applicant response
<b>Car Parking</b>	TfNSW would ask 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. This is particularly the case given the close proximity to rail, Metro, buses, future light rail and ferry services, as well as active transport options.	<p>The proposed provision of parking has been detailed and referenced against the requirements of the PDCP 2011 and PLEP 2011. The proposed maximum car parking provision of 451 spaces is substantially less than the 550 (previously 593) spaces permitted under the PLEP 2011.</p> <p>The car parking provision will be reviewed as part of the future Detailed SSDA(s). Public transport and active transport modes will be promoted over private vehicle use in the Green Travel Plan to be prepared as part of the Detailed SSDAs.</p> <p>A more detailed response to this item is provided within Section 3.3 of the Addendum Traffic and Access Report (Appendix K).</p>
<b>Bicycle Parking and End of Trip (EoT)</b>	TfNSW appreciates the proposed parking for bicycles and End of Trip (EoT) facilities at Buildings A, B, C and D. 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 employees, 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.	Monitoring of bicycle parking and EoT facilities will be considered in the Green Travel Plan to be developed as part of future Detailed SSDA(s).
<b>Travel Access Guide</b>	<p>TfNSW asks that a Travel Access Guide (TAG) be developed and should be included as an appendix in the GTP. The TAG should include separate route maps of all modes of transport; buses (private and public), trains, light rail (when it comes on stream), walking, as well as times for these public transport options.</p> <p><u>Recommendation</u>: The GTP should be submitted to TfNSW for review prior to occupation.</p>	A Travel Access Guide (TAG) will be included in the Green Travel Plan to be developed as part of future Detailed SSDA(s).



No.	Issue raised	Applicant response
<b>Construction Pedestrian and Traffic Management Plan</b>	<p><u>Comment:</u> To mitigate any construction impacts to the surrounding classified road network and multiple active development sites, including the State Significant Infrastructure (SSI) projects of Sydney Metro, TfNSW recommends that Sydney Metro is conditioned to prepare a Construction Pedestrian and Traffic Management Plan (CPTMP).</p> <p><u>Recommendation:</u> No construction zone would be allowed in Macquarie Street and nor site vehicular access including construction vehicles to/from Macquarie Street.</p> <p>Sydney Metro is conditioned to prepare a Construction Pedestrian and Traffic Management Plan (CPTMP) in consultation with TfNSW.</p>	A Construction Pedestrian and Traffic Management Plan (CPTMP) will be prepared as part of future Detailed SSDA(s) in consultation with TfNSW. This requirement is included as a mitigation measure in Appendix B.

#### 4.1.3 Sydney Water

The advice provided by Sydney and Sydney Metro's response is provided in Table 4-3.

**Table 4-3 Response to Sydney Water submission**

No.	Issue raised	Applicant response
<b>Water servicing</b>	The water system should have adequate capacity to service the proposed development. Amplifications, adjustments, and/or minor extensions may be required.	<p>Noted, water servicing will be considered as a part of future Detailed SSDA(s).</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 SSDA stage, the Section 73 application (under the <i>Sydney Water Act 1994</i>) will be made and any need for amplification and/or minor extensions can be determined with certainty.</p>

No.	Issue raised	Applicant response
<b>Wastewater servicing</b>	<p>The proposed development is within Parramatta SCAMP and is a part of the North Head System. The existing wastewater system should have adequate capacity to service the proposed development.</p> <p>However, there is a high-risk overflow structure downstream which could be impacted by the additional discharge resulting from the proposed development. In accordance with EPA requirements, the volume and frequency of spills from high-risk structures should not increase from the baseline.</p> <p>Due to the constraints above, the proponent must engage a hydraulic consultant to demonstrate that the current performance of the wastewater system does not deteriorate in both dry and wet weather as a result of the additional demand required from the proposed development. We recommend that this process be started as early as feasible to reduce any construction delays.</p>	<p>Noted, wastewater servicing and engagement of a hydraulic consultant will be considered as part of future Detailed SSDA(s).</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 SSDA stage, the Section 73 application will be made and any need for amplification and/or minor extensions can be determined with certainty.</p>
<b>Recycled water servicing</b>	<p>Sydney Water is currently developing an integrated water management plan for the Greater Parramatta and the Olympic Peninsula (GPOP) Growth Area and is working together with SOPA to seek cost-effective recycled water solutions and continued recycled water service to SOPA's customers.</p>	<p>Noted, recycled water servicing will be considered as a part a future Detailed SSDA(s).</p> <p>The Integrated Water Management Plan at Appendix W of the exhibited EIS calculated indicative potable water and wastewater demands to clarify potential future demands. These will be reviewed and recalculated as needed at the Detailed SSDA 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.</p>

No.	Issue raised	Applicant response
	<p>It is advised that dual-pipe provisions are investigated in line with the wider Greater Parramatta to Sydney Olympic Park (GPOP) recycled water initiatives and the Parramatta Council initiatives identifying new developments that could install dual reticulation systems to support the immediate or future connection to a recycled water network. Dual reticulation systems should be of sufficient size to supply all non-potable water uses of the building.</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>	

**4.1.4 NSW Department of Climate Change, Energy, the Environment and Water – Biodiversity, Conservation and Science (formerly Department of Planning and Environment – Biodiversity and Conservation)**

The advice provided by the NSW DCCEEW Biodiversity, Conservation and Science (BCS), and Sydney Metro’s response is provided in Table 4-4.

**Table 4-4 Response to NSW DCCEEW BCS advice**

No.	Issue raised	Applicant response
<p><b>Flood Risk Management</b></p>	<p>Flood barriers are proposed to protect the Building A basement from flooding up to the Probable Maximum Flood (PMF). Potential barriers for entries that form part of the Sydney Metro West Stage 3 Critical State Significant Infrastructure (SSI-22765520) are not discussed here. Basements should be afforded passive protection to the PMF level. It is likely that the risk of failure of barriers is even higher for commercial or residential buildings than for metro stations.</p>	<p>Building A and areas of Buildings B, C and D which do not provide a pathway for floodwaters to enter the metro station would aim to be consistent with the PDCP 2011. A range of criteria must be demonstrated in the future Detailed SSDA to validate the appropriateness of the design.</p> <p>Areas of Buildings B, C and D which potentially provide a pathway for floodwaters to enter the metro station would be required to satisfy the Stage 3 CSSI Conditions of Approval. Whilst not the subject of this application, it is noted that these requirements include a detailed risk assessment for active flood mitigation measures and are subject to Planning Secretary approval (refer to Conditions of Approval E3 to E7 of the Stage 3 CSSI). The future Detailed SSDA(s) would contain details of any flood barriers subject of the Parramatta Over and Adjacent Station Development application.</p> <p>A more detailed response to this item is provided within Section 2.2.1 of the Addendum Flooding Report (Appendix L).</p>

No.	Issue raised	Applicant response
	<p>For the concept stage, proper consideration of flood emergency management is required for ground floor retail/commercial areas that do not have internal access to refuge areas, nor protection to the PMF. While the report recommends shelter in place, no detail has been provided for these areas. Noting the lack of warning time, internal access to refuge areas would be required. EHG strongly recommends that the proponent demonstrate the development does not create an unacceptable risk to life. As a minimum, a set of principles should be provided and it should be checked that each of the tenancies or areas can comply with these principles.</p>	<p>Building A and areas of Buildings B, C and D which do not provide a pathway for floodwaters to enter the metro station will be consistent with Part 9.7 of the PDCP 2011, which provides for flood risk management in the Parramatta CBD. This includes the following specifications in Control C.02 of Section 9.7.1:</p> <ul style="list-style-type: none"> <li>• 'Horizontal' evacuation pathways including accessibility considerations.</li> <li>• 'Vertical' evacuation opportunities and shelter in place facilities above the PMF.</li> </ul> <p>Furthermore, Section 9.7.4 of the PDCP 2023 contains specific requirements for commercial and residential developments in the Parramatta CBD regarding horizontal and vertical evacuation (sheltering-in-place) including the provision of a flood refuge above the PMF which is designed for stays of at least 72 hours in duration.</p> <p>These requirements provide a framework for managing risk to life associated with this application. Although the PDCP 2023 will not technically apply to future Detailed SSDAs (as DCPs do not apply to State Significant Development under Section 2.10 of the Planning Systems SEPP); notwithstanding, the DCP will be utilised as guidance and its recommendations complied with.</p> <p>Areas of Buildings B, C and D which potentially provide a pathway for floodwaters to enter the metro station would be required to satisfy the Stage 3 CSSI Conditions of Approval. Whilst not the subject of this application, it is noted that these requirements include an Operational Emergency Management Plan(s) developed in consultation with the SES. A future Detailed SSDA would outline relevant interfaces between the Operational Emergency Management Plan and FERP(s) supporting the application along with consultation with other relevant agencies as per Control C.02 of Section 9.7.4 of the PDCP 2023.</p> <p>A more detailed response to this item is provided within Section 2.1.2 of the Addendum Flooding Report (Appendix L).</p>

No.	Issue raised	Applicant response
	The development introduces a large number of people onto the floodplain. DCCEEWS strongly recommends the SES be consulted regarding emergency management issues.	Building A and areas of Buildings B, C and D which do not provide a pathway for floodwaters to enter the metro station will consider Control C.02 of Section 9.7.4 of the PDCP 2023 which requires consultation with the SES as a relevant state agency when preparing FERP(s). The FERP(s) for the future Detailed SSDA application(s) will be prepared in consultation with the SES.  A more detailed response to this item is provided within Section 2.1.2 of the Addendum Flooding Report (Appendix L).
<b>Biodiversity</b>	EHG notes that it issued its determination to DPE Planning on 19 April 2022 for Sydney Metro's request to waive the requirement for a biodiversity development assessment report to be submitted.	Noted. A BDAR Waiver was issued for the project on 28 February 2022 and was provided at Appendix L of the exhibited EIS.

#### 4.1.5 NSW Department of Climate Change, Energy, the Environment and Water – Heritage NSW (formerly NSW Department of Planning and Environment – Heritage NSW)

The advice provided by the NSW DCCEEWS Heritage NSW and Sydney Metro's response is provided in Table 4-5.

**Table 4-5 Response to NSW DCCEEWS Heritage NSW advice**

No.	Issue raised	Applicant response
<b>Aboriginal cultural heritage</b>	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.	Noted.

No.	Issue raised	Applicant response
<b>Built heritage</b>	The subject development site contains and is located in the immediate vicinity of heritage places that are of both State and local heritage significance.	Noted.
	As this application deals only with building envelopes, it is noted that it does not include details around the interface between the various heritage items (for example local heritage item I703 (Shops and potential archaeological site at 41-59 George Street). Section 3.0 of the Design Quality Guideline is noted and strongly supported. These details in the guideline will be critical to the successful and sympathetic integration of the proposed new elements and the existing heritage items. The application of the guidelines will be considered in detail when the future application is submitted.	Noted. The Parramatta Over and Adjacent Station Development Design Guidelines (Appendix F) now provide objectives and guidance around the adaptive reuse of the George Street Shops (I703).
	The proposed public open space and “civic spine” is generally acceptable. It is understood that there will be an impact to the context of “Kia Ora” (local item I716, 62-64 Macquarie Street) and therefore an impact to the significance of the item. While this is regrettable, the northern end of the public open space has the potential to positively impact on the Roxy Theatre. The public open space will provide expanded views to the Roxy Theatre and may become a key focal point for that area of George Street. Even though the Roxy Theatre is outside the project site, consideration should be given to expanding the Heritage Design Guidelines component of the Design Guidelines to include details and recommendations on the interface with it.	<p>The Parramatta Over and Adjacent Station Development Design Guidelines (Appendix F) includes guidance to ensure that the street wall height of Building A along George Street aligns with the Roxy Theatre (section 2.2 of the Guidelines), and a sensitive design response that activates publicly accessible areas adjoining heritage items will be implemented, including with regards to the Roxy Theatre (section 5.1 of the Guidelines).</p> <p>Furthermore, the proposed tower and podium envelopes respond to the scale of the Roxy Theatre. It is noted that the podium envelope for Building C is part of Stage 3 CSSI Approval. The podium envelope for Building A is part of the Concept SSSA and is of a compatible scale with the prevailing street frontage height of the surrounding heritage context, including Roxy Theatre.</p> <p>The demolition of the surrounding buildings will open up the views of Roxy Theatre, particularly along Civic Link. The tower forms proposed as part of the Concept SSSA do not impact the open space setting around the Roxy Theatre.</p>

No.	Issue raised	Applicant response
		<p>Therefore, the Addendum Historic Heritage Impact Assessment (Appendix M) finds the impact of the project on the Roxy Theatre to be acceptable.</p> <p>A more detailed response to this item is provided within Section 2.1.3 of the Addendum Historic Heritage Impact Assessment (Appendix M).</p>
	<p>The scale of the proposed buildings will adversely impact the various heritage items in the vicinity, though [sic] the potential for visual domination, which in turn emphasises the loss of context, discussed above. Additionally, overshadowing is a particular concern for the Lancer Barracks, Kia Ora, Leigh Memorial Uniting Church and the Horse Parapet Façade (198-216 Church Street and 38-46 Macquarie Street). However, it is noted that some allowances have been made with the envelope configuration to minimise those impacts as far as possible.</p>	<p>The proposed envelopes are consistent with the relevant height and FSR controls applying to the site, with the architectural design response to be completed as part of the future Detailed SSDAs to consider the sensitive surrounding heritage context.</p> <p>From a heritage perspective, the major consideration in the changing context is how the proposal relates to the scale of existing heritage items within and in the vicinity of the Parramatta metro station site. In this regard, the Concept SSDA proposes building envelopes with heights and setbacks accompanied by Parramatta Over and Adjacent Station Development Design Guidelines (Appendix F) such that future detailed design can respond to the context of the historic townscape of Parramatta.</p> <p>A detailed visual impacts and overshadowing analysis was provided at sections 6.4 and 6.3.2 of the exhibited EIS, where the impacts were found to be acceptable. No overshadowing occurs to the Lancer Barracks between 12:00 and 14:00 midwinter as required under clause 7.4 of the PLEP 2011.</p> <p>A more detailed response to this item is provided within Section 2.1.4 of the Addendum Historic Heritage Impact Assessment (Appendix M).</p>
	<p>Regarding impacts to significant view corridors, Historic Heritage Impact Assessment and the Visual Impact Assessment. Please consider the impacts to various views to and from the site. While the proposed buildings will contribute further to the already altered views to the CBD from significant places such as Old Government House, the change to those views is assessed as “not adversely impacted”.</p>	<p>Parramatta metro station is prominently located in the centre of Parramatta CBD with frontage to main streets that are recognised for their historical associations and extant heritage items. It is therefore visible from a range of vantage points, often in the context of views to historic buildings in the vicinity of the site. The site’s significant location requires considered integration into the existing urban grid established in the early history of Parramatta.</p>



No.	Issue raised	Applicant response
		<p>The heightened CBD context is becoming an integral part of the character of longer range views towards the Parramatta CBD. Views to the CBD from Old Government House have been assessed in detail in the Addendum Visual Impact Assessment (Appendix N) and found to be acceptable, the report concluding that “while of larger scale, largely due to distance and the proportion of the view occupied by landscaped open space, it is not considered that the [proposed] CBD buildings individually or as a landscape composition overwhelm or diminish the [Old Government House]”.</p> <p>In the streetscapes in the immediate vicinity of the site, views will be defined by the relationships between elements at podium level given that close range views at pedestrian level are contained within the prevailing height of the street wall. The Addendum Historic Heritage Impact Assessment (Appendix M) considers the impacts to views to and from the site associated with the range of heritage buildings on or in its vicinity.</p> <p>It concludes that there will be an altered visual context associated with the uplift in height proposed on the site as a result of the Concept SSDA building envelopes. Therefore, various mitigation measures are proposed to ensure that heritage items retain a strong visual presence within the Parramatta CBD.</p> <p>Notably, the proposal would not obstruct any views to existing heritage items and rather the proposal shall create opportunities to enhance the visual context. In conjunction with podium envelopes established by Stage 3 CSSI approval, the proposed building envelopes conversely have the capacity improve the views both to and from nearby heritage items, including both Kia Ora and the George Street Shops located within the Parramatta metro station site and other heritage items in the vicinity.</p> <p>A more detailed response to this item is provided within Section 2.1.5 of the Addendum Historic Heritage Impact Assessment (Appendix M).</p>

No.	Issue raised	Applicant response
<b>Historical archaeology</b>	<p>As noted above, this application is limited to above ground works and all archaeology is being managed in accordance with previous approvals, particularly the Conditions of Approval for SSI 10038 (Sydney Metro West – Concept and Stage 1).</p>	<p>Noted.</p>
	<p>It is noted, that Section 3.5 of the Heritage Design Guidelines in the Design Guidelines (p.27) discusses the reconstruction of the town drain within a publicly accessible area of Building C. It is understood that Condition D15 of SSI 10038 states that “All options available to retain the Parramatta Convict Drain in situ must be considered. If retention of any part of the Parramatta Convict Drain located in situ is not feasible, the Proponent must satisfactorily demonstrate to the Planning Secretary why its removal is appropriate.” To date, the Heritage Council of NSW has not received any documentation about this aspect of the SSI 10038 proposal. Therefore, until Condition D15 has been met, we are unable to comment on the appropriateness of those details included in the Design Guidelines, and recommend that the document be amended once Condition D15 has been met and the final decisions regarding the drain have been made.</p>	<p>It is noted that the Concept SSDA does not seek approval for any ground disturbing, Nevertheless, Sydney Metro exposed the Town Drain at the Parramatta station construction site in 2022 as part of the archaeological program being carried out under the Concept and Stage 1 CSSI Approval. Between September and October 2022 Sydney Metro received approval to remove the timber and concrete capping from the drain for conservation and storage and to allow the construction of a temporary road. In January 2023, Sydney Metro received approval for the Stage 3 CSSI, which included the removal of the section of the Town Drain within the Parramatta station construction site.</p> <p>Sydney Metro also received approval to remove the remaining physical elements and archaeological resources associated within the Town Drain under the Concept and Stage 1 CSSI Approval in May 2023. The Town Drain cannot be protected and conserved in situ throughout all stages of Parramatta Over and Adjacent Station Development Design Quality Guidelines (Appendix F) submitted as part of the Concept SSDA require consideration of the reconstruction of the Town Drain in Building C. The archaeological salvage and archival recording of the Town Drain would provide a detailed understanding of what would be required for its potential reconstruction in the OSD.</p>

#### 4.1.6 NSW Department of Climate Change, Energy, the Environment and Water – Water Group (formerly Department of Planning and Environment – Water Group)

The advice provided by NSW DCCEEW Water and Sydney Metro’s response is provided in Table 4-6.

**Table 4-6 Response to NSW DCCEEW Water advice**

No.	Issue raised	Applicant response
<b>Groundwater</b>	<p>The excavation required for the basement carparking for 455 vehicles (which is proposed as a concept in this application) is being assessed under CSSI-22765520. CSSI-22765520 is yet to be approved and the assessment has included groundwater inflow predictions during basement construction of 0.3L/s (9.46ML/yr) and 0.01L/s (0.32ML/yr) during operation. The reduction is due to the use of a tanked basement which is supported by DPE Water.</p> <p>The proponent will need to ensure the groundwater inflows associated with construction and operation are accounted for by a Water Access Licence where the annual volumes exceed 3ML. Water take volumes less than or equal to 3ML can be considered for an exemption in accordance with Clause 7 of Schedule 4 of the Water Management (General) Regulation 2018.</p>	<p>The Stage 3 CSSI Approval was approved on 25 January 2023. Condition E141 of the Stage 3 CSSI Approval requires that Groundwater Modelling Report be prepared in consultation with DPE Water before bulk excavation for the basements begin at Parramatta metro station.</p>

#### 4.1.7 Schools Infrastructure NSW

The advice provided by Schools Infrastructure NSW and Sydney Metro's response is provided in Table 4-7.

**Table 4-7 Response to Schools Infrastructure NSW advice**

No.	Issue raised	Applicant response
<b>Overshadowing</b>	<p>As outlined in the Educational Facilities Standards &amp; Guidelines (EFSG), SINSW aims to ensure that at least 70% of school spaces, including outdoor school play spaces, receive direct sunlight between 9am and 3pm in mid-winter.</p> <p>The submitted view from the sun diagrams and shadow diagrams show that the proposal will likely result in some overshadowing of Arthur Phillip High School and Parramatta Public School during the afternoon. However, it is noted it is hard to distinguish between new and existing shadows from the diagrams provided.</p> <p>Nonetheless, the area of the school likely to be affected includes a key area of open space fronting Smith Street. Despite this, the Solar Access and Overshadowing Report does not address impacts to the schools.</p> <p>Further, it is anticipated additional overshadowing of the school sites will be proposed as a result of increased density controls recently gazetted under the Parramatta CBD Planning Proposal.</p> <p>SINSW requests that DPE and Sydney Metro take into consideration anticipated cumulative overshadowing impacts to the schools and seek to minimise impacts where appropriate.</p>	<p>A review of the Education Facilities standards and Guidelines (EFSG) indicates that the controls are aligned to the NSW Apartment Design Guide (ADG). The ADG provides a test for acceptable additional overshadowing impacts on adjacent multi residential properties which can be applied to school infrastructure. Guidance is provided on the following areas:</p> <ul style="list-style-type: none"> <li>• Living areas and Private open spaces – a minimum of 70% of areas receive a minimum of 2 hours sun between 9am-3pm during mid-winter (21<sup>st</sup> June)</li> <li>• Communal open spaces – a minimum of 50% direct sunlight to the principal usable part of the communal open space for a minimum of 2 hours between 9 am and 3 pm on 21 June (mid-winter).</li> </ul> <p>Potential additional overshadowing from the proposed envelopes has been identified within Arthur Philip High School and Parramatta Public School based on plan shadow diagrams from the 21<sup>st</sup> of June. The Addendum Shadow Assessment Report (Appendix H) has completed a study of Arthur Phillip High School and Parramatta Public School have been undertaken.</p> <p>It concluded that no additional overshadowing of Arthur Phillip High School on the 21<sup>st</sup> of June between 9am and 3pm will occur from the proposed envelopes. While it found that Parramatta Public School communal open spaces are impacted by the proposed envelope between 1:15pm and 3:00pm. The Parramatta Public School building located on the north-west corner of the property is impacted between 2:00pm and 3:00pm. The main Parramatta Public School building located on the east side of the property is impacted between 2:45pm to 3:00pm.</p>

No.	Issue raised	Applicant response
		<p>An analysis of the overshadowing impact on Parramatta Public School communal open space and buildings found that minor impacts will occur and do not reduce levels below the accepted minimums set out in the EFSG.</p> <p>Refer to the Addendum Solar Access and Overshadowing Report (Appendix H) for further detail.</p>
<b>Visual impact assessment</b>	<p>The Application is supported by a Visual Impact Assessment (VIA) which includes an assessment of a viewpoint at the south-east corner of Macquarie Street and Smith Street (Viewpoint 3). This viewpoint is taken from the corner of the Arthur Phillip High School grounds where a local heritage item and areas of open space are located.</p> <p>The assessment of this viewpoint does not identify that there is an educational receiver at this location. SINSW requests that DPE's assessment of visual impacts considers that there is an educational receiver at Viewpoint 3.</p>	<p>The Addendum Visual Impact Assessment (Appendix N) considers the presence of Arthur Phillip High School at Viewpoint 3.</p> <p>In summary, the Addendum Visual Impact Assessment has reviewed Viewpoint 3 with consideration of the Arthur Phillip High School. In conclusion it was determined that the proposal is not considered to give rise to any unacceptable visual change that would be observable from the site of Arthur Phillip High School.</p> <p>Refer to further discussion at Section 5.2.3 below.</p>
<b>Future Detailed SSDA/s</b>	<p>Following any determination of the subject SSDA, it is understood further SSDA/s will be lodged for the detailed building design of the four buildings proposed under this Concept SSDA. SINSW requests future applications consider the following impacts and appropriate mitigation measures in relation to the nearby schools:</p> <ul style="list-style-type: none"> <li>• Overshadowing</li> <li>• Privacy</li> <li>• Traffic during construction and operation</li> </ul>	<p>Noted. Future Detailed SSDA(s) will assess matters as required by SEARs issued for those applications.</p>

No.	Issue raised	Applicant response
	<ul style="list-style-type: none"> <li>• Active transport and student safety noting students will likely be walking to the Parramatta Metro station and along the surrounding street network</li> <li>• Noise and vibration during construction and operation.</li> </ul>	

#### 4.1.8 Other agencies

The following government agency advice did not raise any issues with the Concept SSDA:

- Fire & Rescue NSW
- NSW Environmental Protection Agency
- Sydney Metro
- Ausgrid.

## 4.2 Community and organisation submissions

**Table 4-8** includes a response to the issues raised in submissions from key stakeholders and the community and references where these issues have been addressed in the detailed documentation as relevant. In summary, the issues raised relate to:

- Bulk and scale
- Business case
- Camellia metro station
- Construction impacts
- CPTED
- Design excellence bonus
- Design with Country
- Economic impacts
- Environmental amenity
- ESD
- Green space and public domain
- Heritage
- Impact on surrounding sites
- Land use and zoning
- Sydney Olympic Park metro station
- Parramatta metro station
- Public art
- Social and affordable housing.
- Tower separation.

**Table 4-8 Response to public submissions**

Topic	Matter	Response
<b>Organisation Submissions</b>		
<b>Business case</b>	The NSW Government should lock in development expectations for Sydney Metro West at the time of the original funding decision.	Sydney Metro is seeking to retain flexibility in the timing, staging and sequency of the proposed Over station and adjacent station development so that its delivery by future developer(s) can appropriately respond to property market conditions. The allocation of funding for Sydney Metro West is outside the scope of this Concept SSDA.
<b>Camellia metro station</b>	Given the significance of Sydney Metro West, NSW government should commit to delivering a metro station at Camelia.	This issue is outside the scope of this Concept SSDA.
<b>Design excellence bonus</b>	Whilst the concept approval establishing the building envelopes does not seek to push the boundaries and apply the bonuses permitted under the Parramatta LEP 2023, we note that a future development application could. Accordingly, we suggest that any design excellence process outside of that within Parramatta LEP 2023 must not be able to utilise the bonuses possible under the LEP.	Future Detailed SSDAs will be limited to the building envelopes and GFA of 176,360m <sup>2</sup> established under this Concept SSDA if development consent is granted.
<b>Tower separation</b>	We note that Part 2F of the ADG sets out that towers greater than 25m in height should adopt a 24m separation. The spatial arrangement between Building A and land to the west is not adequately analysed in the Concept DA with regard to complying with the ADG separation requirements, protecting amenity, providing solar access, and studying the spatial separation between towers in this part of the CBD.	<p>The Parramatta Over and Adjacent Station Development Design Guidelines (Appendix F) includes objectives at Section 2.3 to ensure that towers are to be designed to ensure development does not prejudice the re-development of adjoining sites in the future.</p> <p>The Building A western setback of 10.5 metres is consistent with and represents an improvement to the 9.5 metres setback under the site-specific DCP and is therefore considered appropriate. Therefore, the development does not prevent the consolidation and redevelopment of this site in accordance with the site-specific DCP.</p>



Topic	Matter	Response
	<p>Despite these clear requirements, and the complimentary statements of intent, the proposal fails to provide separation consistent with the ADG, nor justify the variations. The outcome is that Building A will have an impact on the built form on the adjoining site to the west, which is neither justified nor equitable.</p> <p>The Metro station site does not adequately address or consider the possible development outcomes on the land to the west of Building A. The largeness of the building envelopes on the Metro Site and the reduced setbacks along the western boundary led to an outcome where the impacts on the development potential of neighbouring sites should be considered in a reference design.</p>	
<b>Heritage</b>	<p>The proposal does not consider the broader relationship with surrounding land, including historical development patterns and lot sizes. To achieve the larger floor plate permitted on E2 Commercial Centre zoned land, the development must fit seamlessly into its context, complementing the surrounding area, rather than an overbearing dominance. This is particularly important near the historic Church Street</p>	<p>The proposed building envelopes are the result of a significant design and refinement process informed by comprehensive context and site analysis as discussed at Chapters 6 and 8 of the exhibited Built Form and Urban Design Report (Appendix E of EIS).</p> <p>The Addendum Historic Heritage Impact Assessment (Appendix M) considers the Concept SSDA within the surrounding context. From a heritage perspective, the major consideration in the changing context is how the proposal relates to the scale of existing heritage items within and in the vicinity of the Parramatta Metro site. In this regard, the Concept SSDA proposes building envelopes with heights and setbacks accompanied by Design Guidelines such that future detailed design can respond to the context of the historic townscape of Parramatta.</p> <p>Sight lines to Church Street are maintained under the proposal.</p>

Topic	Matter	Response
<b>Impact on surrounding sites</b>	The Sydney Metro proposal or conditions should be imposed on any approval for the project, permitting Macquarie Lane to be used for vehicular access to 75 George Street as part of the redevelopment of 75 George Street.	<p>Refer to detailed response provided within Section 3.5 of the Addendum Built Form and Urban Design Report (Appendix E).</p> <p>The public domain to the west of 73-75 George Street forms part of the Stage 3 CSSI Approval and is not covered under the Concept SSDA. Furthermore, it is noted that 73-75 George St has an existing driveway entrance off Smith St. There are no existing access/egress points to this development along the western side.</p>
<b>Land use zoning</b>	A B4 Mixed Use zoning should be applied to the site.	The site is zoned part B3 Commercial Core and part B4 Mixed Use under the PLEP 2011. Changes to land use zoning is outside the scope of this Concept SSDA. It is not legally required or permissible to apply the B4 Mixed Use zoning to the whole site.
<b>Social and Affordable housing</b>	<p>30 percent of the residential component should be designated social and affordable housing.</p> <p>Provide incentives for tenders to deliver above the 30 percent minimum.</p> <p>Require tenders for the station precinct developments to include a community housing provide as a joint venture partner.</p>	<p>There is no statutory requirement for the provision of affordable housing on the Parramatta OSD site under the PLEP 2011.</p> <p>It is noted that the <i>Parramatta City Centre Local Infrastructure Contributions Plan 2022</i> includes a 5% levy on development within the Parramatta CBD area, which includes the Parramatta OSD and ASD site.</p> <p>Notwithstanding the absence of statutory planning requirements for affordable housing on this site, Sydney Metro will 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>

Topic	Matter	Response
<b>Public Submissions</b>		
<b>Bulk and scale</b>	Proposed buildings should be at least 40 storeys high and have at least 20% more GFA. More residential accommodation GFA should be accommodated.	<p>The proposed building envelope heights are limited by the solar access planes to the Lancer Barracks and Parramatta Square, as required under clause 7.4 of the PLEP 2011. Additional building height would result in non-compliance with these solar access requirements.</p> <p>The bulk and scale of the envelopes provide a balance between providing an appropriate quantum of high quality commercial and residential floorspace, against the need to ensure that the buildings do not appear excessively bulky or overbearing from the public domain and in the streetscape.</p>
	Buildings A, C and D should be broken up into a series of thinner, smaller buildings.	<p>The proposed building envelopes are guided by the functionality requirements of Parramatta metro station below, mitigating external impacts, and the need to establish floorplates which are suitable for high grade commercial office development.</p> <p>Detailed massing studies and analysis is provided in Section 13 of the Built Form and Urban Design Report at Appendix E of the EIS and demonstrate that the proposed layout results an optimal development with regard to the surrounding amenity.</p> <p>A future Detailed SSDA(s) will further refine the vertical articulation of the buildings consistent with the objectives and guidance within the Design Guidelines.</p>
	Ensure the Building C podium design reflects the Roxy Theatre.	The Building C podium falls within the scope of works for the Stage 3 CSSI Approval and is not considered in the Concept SSDA.
<b>Construction impacts</b>	Construction noise and inconveniences for local residents.	Construction impacts are a matter of consideration for future Detailed SSDA(s), where further detail will be provided when construction methodology and staging is known.
<b>CPTED</b>	Security enhancements should be integrated into the development.	Security enhancements to the site and the buildings will be considered as part of future Detailed SSDA(s).
<b>Designing with Country</b>	Opportunities for Indigenous design should be considered.	The inclusion of Aboriginal and Torres Strait Islander design will be considered as a part of a future Detailed SSDA(s) as outlined under Section 2.5 'Connecting with Country' in the Parramatta Over and Adjacent Station Development Design Guidelines (Appendix F).

Topic	Matter	Response
<b>Compensation</b>	Compensation should be provided to surrounding residents due to impacts of the proposal.	This matter is not a planning assessment consideration.
<b>Environmental amenity</b>	Further consideration of environmental factors (wind, sun, heat, rain) required.	<p>The EIS included the following technical reports that specifically address environmental factors:</p> <ul style="list-style-type: none"> <li>• Appendix DD – Solar and Overshadowing Report</li> <li>• Appendix J – Shadow studies</li> <li>• Appendix S – Ecologically sustainable development report</li> <li>• Appendix T – Flooding Report</li> <li>• Appendix Y – Pedestrian Wind Assessment</li> <li>• Appendix X – Reflectivity Assessment</li> </ul> <p>In addition, updated technical reports and addendums have been prepared to accompany this Submissions Report:</p> <ul style="list-style-type: none"> <li>• Addendum Shadow Assessment Report (Appendix H)</li> <li>• Addendum Flooding Report (Appendix L)</li> <li>• Addendum Pedestrian Wind Assessment (Appendix O).</li> </ul> <p>Further detailed consideration of environmental factors including wind, sun, heat, rain and climate change will form part of the future Detailed SSDA(s).</p>
<b>ESD</b>	Need to consider energy requirements.	This Concept SSDA commits to an ESD Framework for future Detailed SSDA(s) – refer to Appendix S of the exhibited EIS. ESD will be further considered at detailed design stage.
<b>Green space and public domain</b>	Building B could become a green space with Aboriginal heritage components and sustainable/green products (e.g. recycled benches) – where office workers can enjoy their lunch in the shade and fresh air	<p>It is not feasible to deliver a public green space at Building B considering the metro station entrance at this location, as approved under the Stage 3 CSSI Approval. The Building B envelope is located largely above the station entrance.</p> <p>It is noted that the proposed precinct layout substantially increases the amount of public open space proposed for the site when compared to the public open space required by the PDCP 2011.</p>

Topic	Matter	Response
	The design of the Civic Link should better integrate with and reflect the architecture of the Roxy Theatre.	Noted. The Civic Link forms part of the Stage 3 CSSI Approval and does not form part of the Concept SSDA.
	Kia Ora should be surrounded with more open space and landscaping.	<p>Kia Ora is to be located within the new Civic Link subject of the Stage 3 CSSI Approval, and is afforded significant separation from Building C to the east and Building D to the west, allowing for pedestrian movement and appreciation of the heritage item in all directions. The design of Civic Link is to be considered further within the SDPP as required under the Stage 3 CSSI Approval.</p> <p>The Parramatta Over and Adjacent Station Development Design Guidelines (Appendix F) ensures that sensitive design response that activates publicly accessible areas adjoining heritage items will be implemented, including with regards to the Roxy Theatre (section 5.1 of the Guidelines).</p> <p>The Historic Heritage Impact Assessment at Appendix V of the EIS concludes that the Concept SSDA will not have an adverse impact on Kia Ora.</p>
<b>Heritage</b>	Location of Building A and B basement entrance devalues the significance of the heritage Shops (43-47 George Street).	<p>The vehicle entrances for the basement were approved as part of the Stage 3 CSSI Approval and are outside of the scope of this Concept SSDA.</p> <p>It is noted that the proposed basement entrance location for Buildings A and B were informed by the requirements selected on the basis of spatial limitations of the Parramatta metro station (which bisects the site), to prevent basement access directly from George Street (to maximise pedestrian amenity and safety), and to locate the entrance away from the Civic Link.</p> <p>Design guidance in relation to the interface with the George Street Shops has been provided at Section 5.2 of the Parramatta Over and Adjacent Station Development Design Guidelines (Appendix F). The design must have regard to the heritage curtilage zone and heritage interface zone, should be of a sensitive design and be consistent with the Conservation Management Plan prepared as part of the Stage 3 CSSI Approval.</p>

Topic	Matter	Response
<b>Impact on surrounding sites</b>	Site next to Building B will be landlocked.	<p>Three scenarios have been included in Section 1.3 of the Addendum SEPP (Housing) Compliance Report (Appendix G) for a mixed use building with predominately commercial, residential and hotel accommodation on land to the south-west of the site.</p> <p>Refer to the Addendum Built Form Urban Design Report (Appendix E) and Addendum SEPP (Housing) Compliance Report (Appendix G).</p>
	Request by owner of 240 Church Street to be included in masterplan and have a basement connection.	<p>Excavation of the basements at Parramatta are not part of the subject Concept SSDA and were assessed under the Concept and Stage 1 and Stage 3 CSSI Approvals. No further excavation works are proposed as part of this proposal.</p> <p>The Concept SSDA will approve the maximum number of car parking spaces within the parameters of the basement shell while the Detailed SSDA(s) will provide detailed consideration and approve the fitout and layout of the spaces including further consideration to basement design and access arrangements and opportunities. The site 240 Church Street does not fall within the site area while the basement shell has been approved in the Stage 3 CSSI and therefore a basement connection is not considered to be in the scope of works for the Concept SSDA.</p>
<b>Land use</b>	Building B should be deleted as there is an oversupply of residential floorspace in the Parramatta CBD, and more people favour a house in the suburbs.	<p>The Central City District Plan identifies a need for 7,500 new dwellings in the Parramatta CBD by 2036. The Parramatta CBD Planning Proposal (now gazetted) goes further and aims to deliver 15,900 new dwellings in the Parramatta CBD.</p> <p>The proposed development represents a key opportunity to contribute to the achievement of the dwelling target given its location directly above Parramatta metro station, in line with transit-oriented development principles and boost housing supply in NSW.</p> <p>Building B is zone B4 Mixed Use under the PLEP 2011 and shop top housing is a permitted use in the zone. More broadly, across the site residential accommodation is permitted in a rail corridor under Clause 2.94 of the <i>State Environmental Planning Policy (Transport and Infrastructure) 2021</i> (Transport and Infrastructure SEPP) where development is carried out wholly or partly above a railway station. This encourages residential accommodation near railway stations.</p>

Topic	Matter	Response
	Building heights for A, D and C should be reduced considering the high rates of vacancy/oversupply of commercial floorspace in the Parramatta CBD.	<p>The Central City District Plan identifies a need to accommodate 27,000 new jobs in the Parramatta CBD by 2036. Greater Parramatta has the potential to be transformed into one of Australia’s most important business hubs.</p> <p>The Economic Impact Assessment at Appendix R of the EIS considered Covid-19 employment trends but concluded that notwithstanding, the Concept SSDA represents a key development proposal that will meet floorspace demand in the Parramatta CBD.</p>
<b>Olympic Park metro station</b>	The proposed metro station at Olympic Park negatively affects the character of Olympic Park.	This issue is outside the scope of this Concept SSDA.
	The Olympic Park metro station has too many apartment towers.	This issue is outside the scope of this Concept SSDA.
	<ul style="list-style-type: none"> <li>The Olympic Park metro station should avoid park land and utilise sanctuary owned land.</li> </ul>	<ul style="list-style-type: none"> <li>This issue is outside the scope of this Concept SSDA.</li> </ul>
<b>Parramatta metro station</b>	<ul style="list-style-type: none"> <li>Consider an underground pedestrian link between the proposed Parramatta metro station, and Parramatta railway station.</li> </ul>	<ul style="list-style-type: none"> <li>The design of the Parramatta metro station is outside the scope of this Concept SSDA.</li> </ul>
	The design of Parramatta metro station should better preserve residential amenity.	The design of the Parramatta metro station is outside the scope of this Concept SSDA.
	Ensure escalators are provided to Macquarie Street from the metro station to connect with the Light Rail.	The design of the Parramatta metro station is outside the scope of this Concept SSDA.
	Ensure cyclists are provided with access to Parramatta metro station.	<p>The design of the Parramatta metro station is outside the scope of this Concept SSDA.</p> <p>Bicycle parking for metro station users have been provided.</p>
<b>Public art</b>	Include public art that is appropriate to the place.	<p>Objectives and guidelines in relation to public art, as well as indicative locations are provided as part of the Parramatta Over and Adjacent Station Development Design Guidelines (Appendix F).</p> <p>Public art will be further considered within future Detailed SSDA(s).</p>

## 5 Additional assessment and clarifications

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This section provides additional assessment of the proposal in response to the DPHI's Response to Submissions – Addendum dated 6 February 2023 requesting Sydney Metro provide additional assessment of the proposal in relation to the following matters:

- clarify the proposed floor space ratio having regard to clause 4.6(8)(ac) of the PLEP 2011
- address amenity matters including compliance with the ADG and impact on adjoining sites (198-216 Church Street and 38-46 Macquarie Street), cumulative shadow impact to surrounding schools, and visual impact from schools.
- clarify the project's response to advice provided by the Sydney Metro West Design Advisory Panel (DAP) and seek further advice from DAP on whether the proposal can achieve Design Excellence in accordance with clause 7.11 of the PLEP 2011
- review and revise the Design Guidelines to support the objectives and be consistent with the ADG, respond to advice from DAP, and respond to Council's advice
- address traffic and parking matters including clarity if pedestrian counts factored in reductions of movements from Covid-19 and confirm detail in regard to bicycle, car-share and motorcycle parking
- address matters in relation to public domain and integration including clarification of the staging and delivery of public works, and consult with Council in relation to key issues raised by Council in relation to a whole precinct approach to public domain and street connectivity, alignment and site access
- address other issues including updating of documentation to include dimensions and clarification of dimension discrepancy, provide recommendation in the Contamination Report for future Detailed SSDA(s), clarify the provision of affordable housing, and provide updated stormwater and flooding modelling to address inconsistencies.

### 5.1 FSR variation

The DPHI have requested additional information to clarify the proposed floor space ratio having regard to clause 4.6(8)(ca) of the PLEP 2011.

The EIS included a Clause 4.6 Variation Request (Appendix II of the exhibited EIS) that sought to vary Clause 7.24(3)(b) of the PLEP 2011. The Clause 4.6 variation justified the contravention of the commercial floor space of Building B, under Clause 7.24(3)(b) of the PLEP 2011.

Clause 7.24(3)(b) of the PLEP 2011 applies to Building B, given that the site is zoned B4 Mixed Use and is nominated as "Clause 7.24" on the Additional Local Provisions Map. Building B fronts Church Street and is entirely within the "Clause 7.24" area.

The nominal site area for Building B is 2,470m<sup>2</sup> and therefore a minimum of 2,470m<sup>2</sup> commercial floor space is required under Clause 7.24(3)(b). As exhibited, the proposal included 1,114m<sup>2</sup> of commercial floor space, representing a shortfall of 1,356m<sup>2</sup> to meet the 1:1 FSR requirement.



The DPHI's and Council's submission requested that the Clause 4.6 Variation Request be reviewed with reference to Clause 4.6(8)(ca) of the PLEP 201, which includes a 5% floor space ratio variation cap.

In order to address the non-compliances with the minimum 1:1 commercial FSR and the 5% FSR variation cap, the commercial FSR to Building B was increased to 1:1 (or 2,616m<sup>2</sup> of GFA). In this regard the Clause 4.6 Variation Request is removed from the Concept SSDA as it is no longer required.

## **5.2 Environmental Amenity impacts**

DPHI have requested additional information with regards to the following amenity impacts:

- revising the Building B envelope to support good residential amenity in accordance with the Apartment Design Guide (ADG) and address the impacts of the proposal to the adjoining sites at 198-216 Church Street and 38-46 Macquarie Street
- address the cumulative shadow impacts during the afternoon to key open space areas of Arthur Phillip High School and Parramatta Public School
- revise the Visual Impact Assessment for the viewpoint at the south-east corner of Macquarie Street and Smith Street (Viewpoint 3) to consider the educational use and any heritage item and open space at this location.

The response to these matters is provided in the below subsections.

### **5.2.1 Building B tower envelope**

The Addendum SEPP (Housing) Compliance Report at Appendix G provides preliminary analysis of the Building B tower floorplate and Indicative Reference Scheme floorplate against the ADG and confirms that a high level of amenity is capable of being delivered within the envelope under a future Detailed SSDA. Detailed analysis against the relevant objectives and design guidance of the ADG will be provided under a future Detailed SSDA.

The southern setback of the Building B tower envelope has been increased from 4.5 metres to 6 metres for full compliance with the ADG. Six metres is a complying side boundary setback dimension for a building 9 and above storeys in height, provided there are no windows to habitable rooms in adjacent buildings on this frontage. The Indicative Reference Scheme (Appendix I) incorporates no windows or habitable rooms along this frontage. Refer to detailed discussion at Section 3.3.1 above.

Detailed massing analysis has been provided at Section 3 of the Addendum SEPP (Housing) Compliance Report at Appendix G demonstrating that Building B will not compromise the redevelopment of 198-216 Church Street and 38-46 Macquarie Street (Site 03) to the south. Commercial, hotel, and residential options are explored in the report and all are found to be feasible (Figure 5-1). Therefore, the redevelopment potential of this site is maintained.

**Option 01 - Commercial**

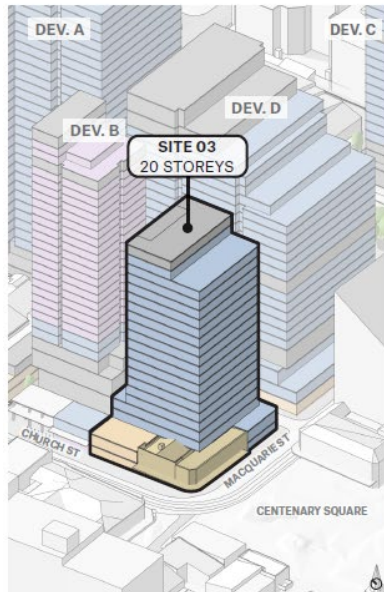


Figure 3-19 Site 03 Commercial Office Isometric

Permissible GFA:	20,660m <sup>2</sup>
Total GBA:	24,644m <sup>2</sup>
Total GFA:	19,934m <sup>2</sup>
Total GFA/GBA efficiency:	81%
Total FSR:	9.65 : 1

**Option 02 - Hotel**

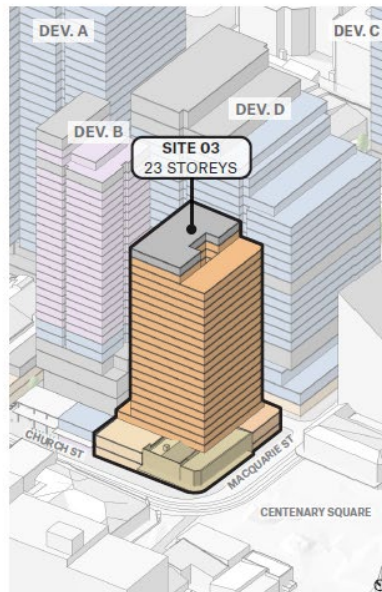


Figure 3-20 Site 03 Hotel Isometric

Permissible GFA:	20,660m <sup>2</sup>
Total GBA:	27,637m <sup>2</sup>
Total GFA:	22,830m <sup>2</sup>
Total GFA/GBA efficiency:	83%
Total FSR:	11.05 : 1
Min. Commercial FSR:	1 : 1
Approx. Total Keys:	340

**Option 03 - Residential**

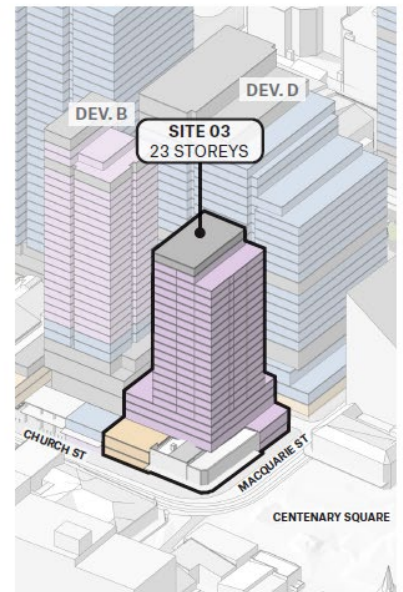


Figure 3-21 Site 03 Residential Isometric

Permissible GFA:	20,660m <sup>2</sup>
Total GBA:	23,639m <sup>2</sup>
Total GFA:	18,500m <sup>2</sup>
Total GFA/GBA efficiency:	78%
Total FSR:	8.96 : 1
Min. Commercial FSR:	1 : 1
Approx. Total Apartments:	135 Apts

**Figure 5-1 Redevelopment potential of Site 03 – commercial, hotel and residential options**

The Addendum SEPP (Housing) Compliance Report confirms that Building B residential floor plate has been carefully designed to:

- maximise solar access for future residents and neighbourhood sites
- optimise views and outlook
- maximise cross ventilation
- provide natural light and cross ventilation to circulation spaces
- eliminate south facing apartments.

The typical low rise tower plan for the refined Indicative Reference Scheme is provided in Figure 5-2 below. The two southernmost apartments on the floorplate have been designed to maximise residential amenity. Further detail is provided in the Addendum SEPP (Housing) Compliance Report (Appendix G).



**Figure 5-2 Building B Indicative Reference Scheme typical residential floorplate**

### 5.2.2 Cumulative shadow impacts

The Addendum Solar Access and Overshadowing Report (Appendix H) addresses the cumulative shadow impacts during the afternoon to key open space areas of Arthur Phillip High School and Parramatta Public School.

In summary:

- There is no additional overshadowing of Arthur Phillip High School on the 21<sup>st</sup> of June between 9am and 3pm as demonstrated in Appendix A of the Addendum Solar Access and Overshadowing Report.
- The minimum solar access requirement of the Education Facilities Standards and Guidelines (EFSG) is 70% of communal open space area on the 21<sup>st</sup> of June between 9am and 3pm. The proposed envelopes maintain solar access to 78% of the area which exceeds this requirement.

Therefore, the proposed envelopes will not generate unacceptable environmental impacts with regards to overshadowing.

### 5.2.3 Visual Impact Assessment

The Addendum Visual Impact Assessment (Appendix N) considers the presence of an educational receiver (Arthur Phillip High School) at Viewpoint 3, in response to DPHI and Schools Infrastructure NSW comments on considering the educational use at this location.

In summary, Arthur Phillip High School is at the south-east corner of the Macquarie Street and Smith Street intersection. This School is not visible within Viewpoint 3, which is angled in the opposing direction. Notwithstanding this, as Arthur Phillip High School is identified as a local heritage item under Schedule 5 of the PLEP 2011,

it is necessary for any potential visual impact of the proposal be considered with particular regard for associated historic values.

The Addendum Visual Impact Assessment finds that proposal does not compromise the desired street wall alignment along Macquarie Street, in addition to the alignment of the Civic Link. With further regard for the commercial context of the Parramatta CBD and the retained extent of the open sky vista at Viewpoint 3, the proposal is not considered to give rise to any unacceptable visual change that would be observable from the site of Arthur Phillip High School.

## **5.3 Design Excellence**

DPHI wish to clarify the response to advice provided by the Sydney Metro West Design Advisory Panel (DAP) and seek further advice from DAP on whether the proposal can achieve Design Excellence in accordance with clause 7.11 of the PLEP 2011.

Sydney Metro has a long-standing commitment to design excellence and has worked with the Government Architect NSW to establish the Sydney Metro West Design Excellence Strategy (DEX Strategy). The Strategy establishes a framework for delivering design excellence for stations, precincts and development which is substantially integrated with Critical State Significant Infrastructure. At Parramatta, this includes all developments (Buildings A, B, C and D).

### **5.3.1 Design Advisory Panel**

The Design Advisory Panel (DAP) is a Sydney Metro initiative that precedes the operation of a formal Design Review Panel as part of Sydney Metro's Design Excellence Strategy. The role of the DAP is to provide strategic design guidance, based on sketches and options presented at the early stages of concept 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.

Aligned with the Sydney Metro Design Excellence Strategy and PLEP 2011 Clause 7.10(2), whether a proposal demonstrates Design Excellence is established at Detailed SSDA. Prior to lodgement of the Detailed SSDA, the Sydney Metro West Design Review Panel provides advice on whether the proposal can achieve Design Excellence in accordance with PLEP 2011 Clause 7.10(4) and the Sydney Metro West DEX Strategy (refer 4.2 DEX Strategy).

The DAP has guided the design development of the concept planning envelope and Indicative Reference Scheme for the Parramatta metro station site, covering both the station design (under the Stage 3 CSSI Approval) and the proposed OSD and ASD design (this Concept SSDA).

Seven (7) DAP meetings were held during the evolution of the Concept SSDA building envelopes and Indicative Reference Scheme for the Paramatta metro station site. A summary of advice received from the DAP, and the relevant project response is provided in Appendix C. Key areas of design advice from DAP relating to the Concept SSDA include:

- Podium and street wall heights
- Tower envelopes
- Wind mitigation
- Laneway width
- Building entries and prominence
- Connecting with Country guidance

- Heritage interfaces to Kia Ora and George Street shops
- Design Guidelines

### 5.3.2 Design Excellence Strategy

This section provides further clarification on the design excellence pathway outlined in the Sydney Metro West Design Excellence Strategy (DEX Strategy) and when design excellence is to be demonstrated.

Sydney Metro has embedded design excellence in all stages of the design process and has led the way in setting new benchmarks for delivery of excellence in design for major infrastructure projects. The DEX Strategy outlines Sydney Metro's approach to deliver design excellence across the Sydney Metro West project. The DEX Strategy applies to stations, precincts and OSDs which are substantially integrated with Critical State Significant Infrastructure. At Integrated Station Development precincts including Parramatta, the DEX Strategy applies to any development which will be substantially integrated with the CSSI to ensure design coordination, constructability of the Critical State Significant Infrastructure and enable a holistic design outcome for the precinct.

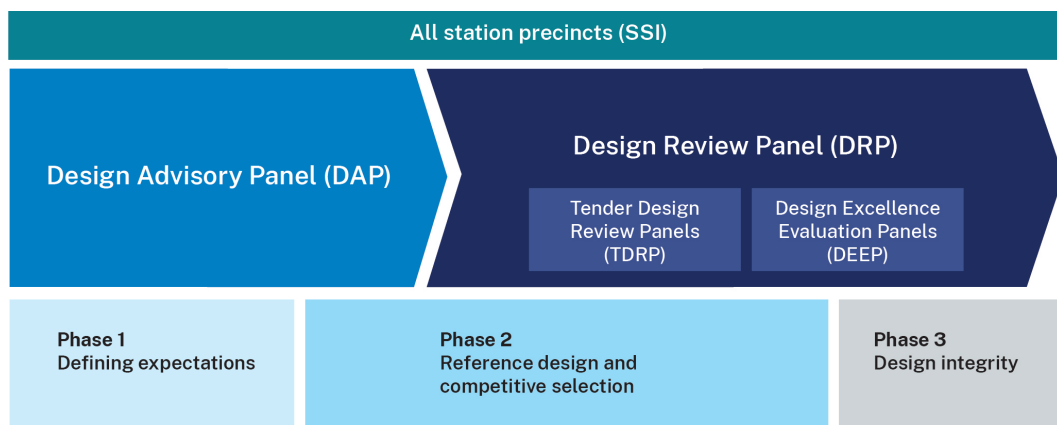
The DEX Strategy adopts a specialised approach driven by:

- the need to integrate Critical State Significant Infrastructure with development substantially integrated with CSSI, recognising the complexity of designing and constructing underground stations with development above
- the nature and associated complexity of the design and design assurance processes required to deliver railway infrastructure, acknowledged through Technically Assured Organisation (TAO) accreditation
- the interdependent nature of multiple procurement packages which drive the need for certainty in tender outcomes and define interface requirements for other packages
- the accelerated construction period of both the infrastructure and development
- the need to integrate all elements of the design and construction of the project through the various concurrent development stages.

The DEX Strategy sets out how design excellence is considered from the inception of ideas and concepts that define expectations, through design development and procurement to delivery.

As outlined in Section 6 of the DEX Strategy, the integrated nature of designing for a Metro station, and any development substantially integrated with the station development calls for embedding design excellence throughout the lifecycle of the design process. This allows for the design evolution to take place over years, with station and development teams working closely from early concepts to reference design to the tender phase.

The DEX Strategy provides an alternative design excellence pathway structured around three phases, as identified in Figure 5-3 below.



**Figure 5-3 Design excellence overview**

As part of Phase 1, Sydney Metro establishes a DAP which is chaired by the Government Architect to guide the concept design of the station, the station precinct, and any development substantially integrated with CSSI. It is during Phase 1 that the design approach for the Parramatta Concept SSDA was developed.

### 5.3.3 Design Excellence for Concept SSDAs

Clause 7.12 of the PLEP 2011 delineates the requirements for a competitive design process in the Parramatta City Centre. Clause 7.12(4) provides that:

(4) *This clause does not apply to the following development—*

(a) *development in relation to which the Planning Secretary had, immediately before 18 December 2015, issued a certificate under Parramatta City Centre Local Environmental Plan 2007, clause 22B(5),*

(b) ***development the subject of a concept development application for which development consent may be granted on the determination of the concept development application.*** (Emphasis added)

Therefore, in accordance with Clause 7.12(4)(b), a competitive design process is not required for this Concept SSDA.

### 5.3.4 Design Excellence for Detailed SSDAs – Competitive Design Process

In line with Parramatta LEP 2011, development consent must not be granted to development unless the Consent Authority is satisfied that a competitive design process has been held in relation to the development (Clause 7.12(2)).

A *competitive design process* is defined by Clause 7.2 PLEP 2011 as an architectural design competition carried out in accordance with procedures approved by the Planning Secretary.

An *architectural design competition* is, in turn, defined as a competitive process conducted in accordance with the Design Excellence Guidelines.

The GANSW Design Competition Guidelines set out the requirements for competitive design processes and the stages of the process. In line with the GANSW Design Competition Guidelines, a proponent is required to prepare a design excellence strategy which outlines how a proposal will achieve design excellence and sets out the details of the competitive design process.

The DEX Strategy was prepared and endorsed by the Government Architect of NSW in 2022. It sets out the bespoke approach for Sydney Metro Stations (Critical State Significant Infrastructure) and for development substantially integrated with a metro station. Specifically, the Strategy sets out how Detailed SSDAs which are integrated

with Critical State Significant Infrastructure will satisfy statutory planning requirements for design competitions.

### **Competitive Design Process for Integrated Station Development**

Design excellence in the context of statutory development approval processes in NSW often involves a competitive stage where an independent jury assesses and selects a winning design based on an agreed set of design-related selection criteria. The design competition is undertaken at a single point in time in the development approval process.

The integrated nature of Metro stations, precincts and integrated development calls for embedding design excellence throughout the lifecycle of the SMW project from inception of ideas and concepts that define expectations, through design development and procurement to delivery.

A key objective of the Sydney Metro West Design Excellence Strategy involves consideration of design excellence through infrastructure and development procurement processes, driving competition between tenderers to enable the best designs, commercial outcomes and technical requirements to be delivered. Where proposals include over station development, tenderers' designs are scrutinised, evaluated and refined throughout the procurement process to ensure that all proposals demonstrate capability to deliver design excellence for stations, precincts and development.

The DEX Strategy outlines how the competitive design process is embedded through Phase 2 (Reference Design and Competitive Selection – occurring during Tender), facilitating a competitive design tension during Sydney Metro's procurement and the detailed design of stations, precincts and development.

The competitive design process phase includes the establishment of a design excellence panel chaired by the Government Architect of NSW that comprise suitably qualified members from the State Design Review Panel and a Council nominated Member to review and provide advice on the design evaluation of tender submissions. The Panel at this Phase of the process is called a Design Excellence Evaluation Panel (DEEP). The DEEP for the Parramatta Metro station precinct will include a Panel Member nominated by the City of Parramatta Council.

The DEEP process ensures that each of the shortlisted design schemes is capable of achieving design excellence. This means that the successful tenderer is able to demonstrate the achievement of commercial and technical acumen and ensure that design excellence can be delivered by adopting the recommendations of the DEEP members.

Once the tender is awarded, Detailed SSDAs would be required for Building A (podium and tower) and Buildings B, C and D (towers) to be reviewed by the Sydney Metro West Design Review Panel and assessed by DPHI. It is in this stage where the DRP can provide advice that the scheme can demonstrate design excellence.

The adoption of the SMW DEX Strategy and its competitive design process for integrated station development is consistent with precedents established for other major infrastructure projects including Sydney Metro City & Southwest and has been accepted by GANSW on behalf of the Planning Secretary of DPHI as being an appropriate mechanism to achieve design excellence for Sydney Metro.

Given the above, it is considered that this arrangement is a "competitive design process" that is consistent with procedures approved by the Planning Secretary and therefore meets the requirements of Clause 7.12 of the PLEP 2011.

## 5.4 Design Guidelines

The DPHI have requested that Sydney Metro review and revise the submitted Design Guidelines to:

- support the objectives and be consistent with the requirements of the Apartment Design Guide (ADG)
- respond to the advice of the DAP
- respond to Council's submission.

The following sections outline how each of the DPHI's requests have been addressed.

### 5.4.1 Amendments to Design Guidelines

Additional text and figures have been added to the Parramatta Over and Adjacent Station Development Design Guidelines (Appendix F) to:

- Improve legibility and role of the document and its applicability
- Integrate and restructure Land Use and Function and Places and Spaces sections to remove duplication with LEP controls or content provided in the Sydney Metro West Station and Precinct Design Guidelines
- Refine objectives and guidance throughout to reduce overlap with approved Sydney Metro West Station and Precinct Design Guidelines which guides CSSI elements
- Integrate feedback from the DAP and Council.

Amendments to various sections of the Design Guidelines are outlined below in Table 5-1.

**Table 5-1 Amendments to the Design Guidelines**

Section	Amendments
<b>Podium and Street Wall (section 2.2)</b>	<ul style="list-style-type: none"> <li>• Amendment to New Horwood Place streetwall height to establish a consistent RL 33 street wall height with allowance for stepping at street edges and laneways</li> <li>• Strengthened guidance on podium design and interfaces with streets and public domain</li> <li>• Introduced guidance on architectural treatment of inactive facades, including locations of service cores</li> </ul>
<b>Tower Massing and Envelopes (section 2.3)</b>	<ul style="list-style-type: none"> <li>• Strengthened objectives regarding building separation and visual privacy</li> <li>• Tower setback control diagram embedded and corresponding objectives and guidance refined</li> <li>• Guidance regarding permissibility of a façade zone with minor projections into building setbacks for sun shading or architectural articulation that do not fall within the definition of gross floor area (up to 500mm) embedded</li> <li>• Solar Access Plane diagram updated with additional diagrams to communicate articulation of towers and architectural expression</li> </ul>



Section	Amendments
<b>Access and Connectivity (section 3.0)</b>	<ul style="list-style-type: none"> <li>• Consolidated guidance that is focused on SSDA scope</li> <li>• Strengthened guidance on through site links/arcades</li> <li>• Additional guidance on provision of awnings for weather protection and wind mitigation strategies</li> <li>• Updated guidance to clarify vehicle entry points for ASD and OSD</li> </ul>
<b>Heritage (section 5.0)</b>	<ul style="list-style-type: none"> <li>• Restructured into Objectives and Guidance</li> <li>• Guidance for George Street Shops and Kia Ora adjusted to align with relevant Conservation Management Plans</li> <li>• Revised Kia Ora Heritage Curtilage Zone to be consistent with relevant CMPs and established Kia Ora site area which is consistent with the historical allotment.</li> </ul>

#### 5.4.2 Apartment Design Guide

Section 5.2.1 above summarises the refinements to the Building B tower envelope and the indicative reference design demonstrates that future detailed design is capable of compliance with the requirements of the ADG. The Addendum SEPP (Housing) Compliance Report at Appendix G provides preliminary analysis of the Building B floorplate and Indicative Reference Scheme floorplate against the ADG and confirms that a high level of amenity is capable of being delivered within the envelope under a future Detailed SSDA.

Section 2.3 of the Parramatta Over and Adjacent Station Development Design Guidelines (Appendix F) has been updated to provide guidance regarding Building B compliance with the requirements of the ADG, for the Concept SSDA scope.

Detailed analysis against the relevant objectives and design guidance of the ADG will be provided under a future Detailed SSDA.

#### 5.4.3 DAP advice

The Design Guidelines were presented to the DAP on 24 April 2024. The Design Guidelines as presented incorporated feedback received from previous DAP sessions and Council's submission on the Concept SSDA. Further amendments to the Design Guidelines were recommended at that meeting. These amendments are incorporated into the Parramatta Over and Adjacent Station Development Design Guidelines at Appendix F.

A summary of the DAP advice, including recommended amendments to the Design Guidelines and the relevant project response is provided at Appendix C.

### 5.5 Traffic and parking

DPHI has requested clarification on traffic and parking matters including clarity if pedestrian counts factored in reductions of movements from Covid-19 and confirm detail in regard to bicycle parking and car-share motorcycle parking.

#### 5.5.1 Pedestrian count clarifications

To account for COVID-19 impacts and the reduction in traffic levels on the road network, observed traffic volumes were increased by an amount equivalent to the average monthly reductions between 2019 (pre-COVID) and 2021. The 2021 traffic counts were therefore increased by 3% to account for COVID-19 impacts. Pedestrian

counts were collected in March 2021 however they were not adjusted to account for COVID-19 impacts.

Whilst the pedestrian counts did not follow a similar methodology to the traffic counts, it is difficult to quantify and would have been difficult to develop a robust methodology to justify any increase or reduction in the pedestrian counts. Furthermore, there is typically no baseline to pedestrian demand volumes, similar to that for vehicular traffic (SCATS data, etc), so it is difficult to compare vehicle and pedestrian counts.

From a broader forecasting perspective, pedestrian movements represent local movements through the footpath network. This demand is limited to the growth in the region in itself, unlike vehicular movements that are typically impacted by the wider population and employment increase in the wider metropolitan area. It is also unlikely there has been a significant increase in development from pre-COVID-19 to 2021 to create a large shift.

Furthermore, it should be noted that pedestrian volumes have increased during COVID-19, mainly because work-from-home patterns meant most trips were primarily walking trips within the surrounding footpath network.

### **5.5.2 Bicycle, car-share and motorcycling parking**

The Addendum Transport and Access Report (Appendix K) confirms that bicycle parking will be provided in the basements serving the proposed development. Locations for bicycle parking are provided in the basement of the Updated Indicative Reference Scheme.

The commercial facilities are accessed via lifts or bicycle stairways, while the residential bicycle parking is accessed via a lift from the east-west laneway through the site. The PDCP 2011 requires 990 bicycle parking spaces in total to service the four buildings. Note the requirement is subject to change as part of future design with future Detailed SSDA(s) detailing the amount, location and operational arrangement for bicycle parking, car sharing and motorcycle parking.

## **5.6 Public domain and integration**

DPHI have requested clarification on matters in relation to public domain and integration including clarification of the staging and delivery of public works, and issues raised by Council in relation to a whole precinct approach to public domain and street connectivity, alignment, and site access.

### **5.6.1 Staging and delivery of public works**

The public domain works within the Parramatta metro station precinct are not subject to this Concept SSDA. Station precincts and public domain elements were approved as part of the Stage 3 CSSI Approval and will be delivered in accordance with the relevant Conditions of Approval. The Parramatta metro station precinct would continue to be designed in consultation with Council in accordance with Condition E56 of the Stage 3 CSSI Approval.

The Stage 3 CSSI Conditions of Approval E70, E71 and E72 require the preparation of Station Design and Precinct Plans, which document and illustrate the design of the permanent built works and landscape design of each metro station precinct and how they are to be maintained. The elements to be approved under the Stage 3 CSSI Approval include the permanent public domain and Civic Link (between George Street and Macquarie Street), roads, and podiums of Buildings B, C and D. The Station Design and Precinct Plans will also document how feedback from key stakeholders, including Council has been considered.

The future Detailed SSDA(s) will address the interface and integration with the public domain and the podiums of Buildings B, C and D, which will be undertaken in accordance with the Parramatta Over and Adjacent Station Development Design Guidelines (Appendix F) and the Sydney Metro West Station and Precinct Design Guidelines (Appendix M of the Stage 3 CSSI Submissions Report) which address the interface and integration between the public domain and the built form. In particular, the Parramatta Over and Adjacent Station Development Design Guidelines includes guidance that the alignment and treatment of the podiums along Horwood Place are to be consistent.

### **5.6.2 Collaboration with Council on public domain works**

The project components identified by the DPHI and Council were assessed and approved under the CSSI Stage 3 Approval, rather than the Concept SSDA. The public works are subject to further design development under the Stage 3 CSSI Approval with Sydney Metro committed to ongoing consultation with Council.

In accordance with the Stage 3 CSSI Approval, the Parramatta metro station precinct must be designed in consultation with Council (refer to Condition E56 of the Stage 3 CSSI Approval). As part of the Stage 3 CSSI Approval, Sydney Metro is negotiating an Interface Agreement with Council including the preparation of Specific Project Requirements (SPR) for the design and delivery of the public domain elements. The Interface Agreement and SPR will form part of the part of the contract elements for Parramatta metro station.

Sydney Metro has consulted with Council following lodgement of the Concept SSDA to discuss matters relating to ongoing design development of the Parramatta metro station precinct. This included several collaborative workshops with the City of Parramatta Council on the following dates and with respects to the following items:

- 15 December 2022 – Deep soil and Horwood Place alignment.
- 13 February 2023 – Design updates to incorporate deep soil planting and updates on Horwood Place alignment.
- 1 March 2023 – Overall public domain approach and alignment with Civic Link Design Brief.
- 7 September 2023 – Design updates for additional entrance, Smith Bus Interchange and sewer relocation.
- 17 October 2023 – Civic Link Block 2 and 3 public domain coordination.
- 7 November 2023 – Landscape and public domain overview, Macquarie and United Lanes, HVM and drainage strategy.
- 12 December 2023 – Macquarie and United Lanes, HVM and drainage strategy, skylights.
- 15 March 2024 – Interface Agreement and Specific Project Requirements relating to public domain.
- 11 June 2024 – Interface Agreement and Specific Project Requirements relating to public domain.

## **5.7 Other issues**

Other issues raised by DPHI pertain to updating of documentation to include dimensions and clarification of dimension discrepancy, contamination, clarification on the provision of affordable housing, and stormwater and flooding modelling.

### 5.7.1 Updated architectural drawings

Updated Building Envelope Drawings (Appendix D) have been prepared which include dimensions, setbacks and separation distances. In addition, dimensions have been reviewed and cross checked for consistency. The refined Building B southern tower setback is confirmed to be 6m from the boundary, and the refined Building B eastern tower setback confirmed to be 9.7m from the podium.

### 5.7.2 Contamination

The excavated basement carpark, station infrastructure, and podiums for Buildings B, C and D, form part of the Stage 3 CSSI Approval. The proposed development will be constructed above the Parramatta metro station, subject of the Stage 3 CSSI approval. The management of contamination during the bulk excavation works therefore forms part of the Sydney Metro West CSSI approvals. No direct interaction with the existing ground is anticipated during construction of OSD and ASD. Furthermore, the Concept SSDA proposal does not involve any physical works, with construction to occur under future Detailed SSDA(s).

The Contamination Report submitted at Appendix N of the exhibited EIS confirmed that, as no direct interaction with the existing ground is anticipated during construction or operation of the proposed over station and adjacent station development, the contamination risk is very low. The detailed design of future Detailed SSDA(s) will consider the existing foundation support system of the station podium box, to minimise further ground movement or impact on adjacent structures during construction and operation of the buildings.

Conditions D71 – D78 of the Stage 1 CSSI Approval, and conditions E92 – E101 of the Stage 3 CSSI Approval detail the process required to be followed to ensure any contaminated land is identified and properly managed at the site.

### 5.7.3 Affordable housing

The *Parramatta City Centre Local Infrastructure Contributions Plan 2022* includes levy on development within the Parramatta CBD area, which includes the Parramatta OSD and ASD site, subject of this Concept SSDA.

Sydney Metro will 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.

There is no statutory requirement for the provision for affordable housing on the Parramatta OSD site in the PLEP 2011. It is noted that the City of Parramatta Council's Affordable Rental Housing Policy applies to sites located outside the Parramatta CBD. The Affordable Rental Housing Policy states that "*The Parramatta CBD specific infrastructure funding approach does not include affordable rental housing. Affordable rental housing has not been included because of the already significant scale of infrastructure required to support the Parramatta CBD*".

### 5.7.4 Stormwater and flooding

An updated Integrated Water Management Plan (Appendix P) and Addendum Flooding Report (Appendix L) has been prepared to address all relevant concerns raised by the City of Parramatta Council and NSW Department of Climate Change, Energy, the Environment and Water – Biodiversity, Conservation and Science (formerly Department of Planning and Environment – Biodiversity and Conservation).

Detailed responses to each item raised with regards to stormwater and flooding is provided in Section 4.1.1 and Section 4.1.4.

## 6 Updated proposal justification

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Sydney Metro lodged a Concept SSDA relating to the Parramatta metro station over and adjacent station development. The Concept SSDA was placed on public exhibition from 16 November 2022 to 13 December 2022. In total 29 submissions were received and included submissions made by State and local government agencies, organisations, key stakeholders and the community.

DPHI issued a letter dated 16 December 2022 and a further letter on 6 February 2022 requesting a response to the submissions received from the public and government agencies during the exhibition of the EIS.

This Submissions Report has been prepared in response to the Planning Secretary's request that Sydney Metro provide a written response to submissions received during public exhibition of the Concept SSDA. Each of the submissions received during the public exhibition period have been collated, analysed and addressed in this Submissions Report.

In responding to and addressing the range of matters raised, as well as through further design progressions, the proposal has undergone minor design refinements pursuant to Clause 36 of the EP&A Regulations. This Submissions Report has described and assessed the changes comprising the following:

- straightening and widening of Horwood Place (to be considered as part of Stage 3 Critical State Significant Infrastructure (CSSI) Approval) which has resulted in the removal of Building A podium 3m articulation zone and the eastern elevation of Buildings A and D towers have been reduced by approximately 7m (thereby reducing the floor plates)
- increase in quantum of commercial floorspace in Building B from 1,100m<sup>2</sup> to 2,616m<sup>2</sup> to comply with Clause 7.24 of the PLEP 2011
- inclusion of a tower shoulder to Building B along the southern boundary
- increase the southern setback of Building B envelope from 4.5m to 6m
- minor adjustments to the maximum building heights and approximate number of storeys for Buildings B and D envelopes following further design development
- additional 0.5m flexible facade zone on all tower elevations
- reduction in total GFA sought from 190,000m<sup>2</sup> to 176,360m<sup>2</sup> (excluding station infrastructure GFA that is approved under the Stage 3 CSSI Approval)
- associated refinements and clarifications around the flexible facade zone, Green Star rating, adaptive reuse of heritage items, maximum GFA exclusions and estimated station infrastructure GFA.

In line with the original 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 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 proposal is consistent with the established statutory and strategic planning context, with the proposed building envelopes being consistent with the site's planning controls, and the existing and anticipated future built context of the Parramatta CBD.

- the four proposed building envelopes have been developed to enable a degree of flexibility in the future detailed building design to allow a range of potential design outcomes that will facilitate a high quality development.
- the proposal directly responds to the demand for provision of additional housing in locations close to jobs, consistent with the '30-minute city' concept, which will provide greater residential amenity and contribute to reduced congestion associated with longer commutes.
- the proposal reflects outcomes of community and stakeholder engagement undertaken for Sydney Metro West and in preparation of this application
- it would provide additional employment and residential capacity in the context of the Parramatta CBD, as targeted in the Central City District Plan, ensuring that jobs and dwellings are co-located in a manner which reduces commute times and improves the level of access to facilities, services, transport options and public open space.
- the building envelopes allow for a density appropriate for a transit orientated development and are consistent with Future Transport 2056 and other Government policies to place density above major transport infrastructure.
- the proposal includes a robust framework for the attainment of design excellence and ecologically sustainable development.
- future Detailed SSDA(s) will generate substantial employment generation by providing floorspace for approximately 9,750 direct FTE ongoing jobs and 7,190 indirect ongoing FTE jobs.
- the proposal would not result in any adverse social or economic impacts, is suitable for the site, and is in the public interest.

## Appendix A – Submissions register

Group	Name	Section where issue addressed
<b>Agencies</b>	Transport for NSW	Section 4.1.2
	Sydney Water	Section 4.1.3
	NSW Department of Climate Change, Energy, Environment and Water – Biodiversity, Conservation and Science (formerly Department of Planning and Environment – Biodiversity and Conservation)	Section 4.1.4
	NSW Department of Climate Change, Energy, Environment and Water – Heritage NSW (formerly Department of Planning and Environment – Heritage NSW)	Section 4.1.5
	NSW Department of Climate Change, Energy, Environment and Water – Water Group (formerly Department of Planning and Environment – Water Group)	Section 4.1.6
	Schools Infrastructure NSW	Section 4.1.7
	Fire & Rescue NSW	Section 4.1.8
	NSW Environmental Protection Authority	Section 4.1.9
	Sydney Metro	Section 4.1.10
	Ausgrid	Section 4.1.11
	<b>Council</b>	City of Parramatta Council
<b>Organisations</b>	Urban Taskforce Australia	Section 4.2
	Western Sydney Leadership Dialogue	Section 4.2
	Mirvac	Section 4.2
	Endeavour Energy	Section 4.2
	Dehsabzi Enterprises Pty Ltd	Section 4.2
<b>Individuals</b>	David Hoffman	Section 4.2
	Kim Riley	Section 4.2
	Michael Winston-Smith	Section 4.2
	Matt Mushalik	Section 4.2
	Matt Mushalik (2)	Section 4.2
	Simon Elias	Section 4.2
	Peter Retallick	Section 4.2
	Peter Retallick (2)	Section 4.2
	Name Withheld (1)	Section 4.2
	Name Withheld (2)	Section 4.2
	Name Withheld (3)	Section 4.2
	Name Withheld (4)	Section 4.2
Name Withheld (5)	Section 4.2	

## Appendix B – Revised mitigation measures

Proposed OSD-specific Measure	
Urban Design	<p>The detailed design of the OSD is to be undertaken in accordance with the Design Guidelines at Appendix M of the EIS including to demonstrate that the design is architecturally and structurally integrated. The future Detailed SSDA(s) must address the manner in which the design/proposal has responded to the detail within this concept SSDA and the Design Guidelines.</p> <p>The future Detailed SSDA must implement the process outlined in the Design Excellence Strategy provided at Appendix L of the EIS.</p>
Reflectivity	<p>The following mitigative strategies would be further explored during preparation of subsequent Detailed SSDA(s):</p> <ul style="list-style-type: none"> <li>o Using a less reflective glazing – reduces the amount of light that is reflected from the façade</li> <li>o Different material – using a non-reflective material or materials with increased roughness, will help to control the impact of reflections</li> <li>o Shielding the façade – introducing a non-reflective structure, design, or landscaping that shields the glazed façade will help to control the impact of reflections</li> <li>o Built form – incorporating different built forms can help disperse light reflections. Note that concave-built forms should be avoided as these will instead concentrate sunlight, exacerbating the glare risk.</li> </ul>
Overshadowing	<p>The future development is to demonstrate consistency with the proposed maximum building envelope for each site (as detailed in Appendix J of the RTS Report) so as to ensure that the overshadowing impacts are minimised. Opportunities to articulate the built form to minimise overshadowing impacts, including to neighbouring residential premises, should be investigated. Details are to be demonstrated in the Detailed SSDA(s)</p>
Solar Access	<p>The future Detailed SSDA(s) is to demonstrate consistency with the proposed maximum building envelope for each site (as detailed in Appendix J of the RTS Report) and should seek to optimise solar access to the development and neighbouring residential premises.</p> <p>The future Detailed SSDA(s) for Building B is to be accompanied by a detailed solar access analysis and to demonstrate compliance with SEPP (Housing) and the ADG.</p>
Visual and view Impacts	<p>The future Detailed SSDA(s) is to demonstrate consistency with the proposed maximum building envelope for each site (as detailed in Appendix J of the RTS) to ensure that the visual and view impacts are consistent with the assessment provided in this concept SSDA.</p> <p>Any future Detailed SSDA(s) should also consider:</p> <ul style="list-style-type: none"> <li>o Undertaking of a design excellence process, which should:</li> <li>o Require competitors to address the relevant zone objectives and additional local provisions of the PLEP 2011 that relate to view corridors and visual impacts, as outlined by this VIA.</li> <li>o Encourage competitors to demonstrate consistency with the intended effect of view impact and view corridor provisions provided by the Parramatta City Centre DCP.</li> <li>o Careful attention to form, line, materiality and colour as part of any subsequent approval process for proposal, including as part of design development or as a condition of development consent.</li> </ul>



Proposed OSD-specific Measure	
Wind	<p>Future Detailed SSDA(s) for Buildings A, B or D should consider the following potential mitigation strategies for the east-west through site link or the retail tenancies facing east from Buildings A and D:</p> <ul style="list-style-type: none"> <li>o Fixed or retractable canopies or awnings to protect patrons</li> <li>o Architectural screening in critical positions, such as podium balustrading or landscape screening</li> <li>o Roughing elements (e.g., banners, etc.) as a means of diffusing the energy contained in the wind</li> </ul>
Public space	<p>The following matters relating to security are to be considered in future Detailed SSDA(s):</p> <ul style="list-style-type: none"> <li>o The design of ground floor areas, and immediate floors above, should maximise surveillance opportunities</li> <li>o An effective lighting strategy</li> <li>o Signage and wayfinding should be developed through the proposed development and broader precinct design process,</li> <li>o ongoing site maintenance</li> <li>o limit spaces or dark areas in the proposed building design where loitering and vagrancy can take place</li> <li>o Considerations for the CPTED functions for designation, definition and design.</li> </ul>
Transport, traffic, parking and access	<p>Future Detailed SSDA(s) for OSD and ASD at Parramatta metro station are to comply with the maximum parking rates and required number of loading and servicing bays provisioned for under the proposed concept design.</p> <p>The Traffic and Access Report identifies mitigation measures for future Detailed SSDA(s), which are:</p> <ul style="list-style-type: none"> <li>o A Green Travel Plan, as part of future Detailed SSDA(s), to reduce car trips and encourage the use of sustainable transport.</li> <li>o At least 1-2% parking spaces would be accessible and located to minimise walking distances, such as near lifts</li> <li>o Provision of loading docks adequately sized for the proposed development.</li> <li>o Provision of motorcycle parking, and provision of car share spaces, which are to be determined as part of future Detailed SSDA(s) and should comply with the requirements of the PDCP 2011.</li> <li>o A quantity of bicycle parking which conforms to the Green Star or PDCP 2011 recommendations (whichever is higher; to be confirmed as part of future Detailed SSDA(s)) should be provided. Bicycle parking in the form of Class 2 compounds (bicycle cages) or better and shower and lockers should be provided.</li> </ul> <p>Further analysis of traffic and parking, including detailed compliance assessment with the relevant Australian Standards, should occur as part of future Detailed SSDA(s). Future Detailed SSDA(s) would implement the management and mitigation measures provided within the Traffic and Access Report.</p> <p>As staging for the delivery of the proposed development is subject to future Detailed SSDA(s) and market trends, each future detailed design application should provide a detailed CTPMP to ensure that traffic impacts are appropriately managed during construction, so that service levels of the surrounding road network are maintained during construction of the proposal. The CTPMP will build on the managements plan established under existing approvals on the site.</p>
Ecological sustainable development	<p>Future Detailed SSDA(s) should be consistent with the outcomes of the ESD Report, including implementing the targets identified in Section 3.10 of the EIS.</p>

## Proposed OSD-specific Measure

Stormwater and wastewater	<p>Further work is to be undertaken under future Detailed SSDA(s) once further details are known, including that of the following:</p> <ul style="list-style-type: none"> <li>o Finalise onsite detention requirements based on the finalised architectural scheme</li> <li>o Consultation with Council regarding the extension of pipes in the Council drainage network on George Street to facilitate drainage of Building A</li> <li>o Co-ordination with hydraulic engineers for design of integrated on-site detention and rainwater tanks</li> <li>o Further utilities and feature survey to identify invert levels and location of the existing drainage network.</li> </ul>
Flooding	<p>Future Detailed SSDA(s) should be consistent with the mitigation measures provided within the Flooding Report, which are as follows:</p> <ul style="list-style-type: none"> <li>o Building A and areas of Buildings B, C and D which do not provide a pathway for floodwaters to enter the metro station are to aim to be consistent with the PDCP 2023.</li> <li>o A detailed survey is to be obtained for the final precinct levels along with all the streets surrounding the precinct for the baseline and developed flooding scenarios.</li> <li>o Allowable flood increases are to be consistent with the Stage 3 CSSI Approval.</li> <li>o Modelling to support the Detailed SSDA(s) are to be undertaken in accordance with industry best practice at the time of the assessment. This would include:             <ul style="list-style-type: none"> <li>- 2023 Flood Risk Management Manual and the Flood risk management toolkit including technical guidance discussed in the FB04 along with reports commissioned by the NSW Government which have informed FB04.</li> <li>- Updated guidance on climate change to Australian Rainfall and Runoff Guidelines</li> <li>- Subject to endorsement of the PRFS, updated modelling would be undertaken to inform detailed design and emergency planning based on the endorsed Parramatta River Flood Study model.</li> </ul> </li> <li>o Details of interfaces with the Stage 3 CSSI Operational Emergency Management Plan for flooding where relevant to the Detailed SSDA would be considered in hazard and risk assessments as part of the design process.</li> </ul>

## Proposed OSD-specific Measure

### Waste management

For future Detailed SSDA(s), the following measures to be implemented where practicable during the construction stage:

- o specifications relating to incorporation of used materials or materials with recycled content which contribute to landfill diversion targets set by the City of Paramatta
- o enabling the purchase of materials in shape / dimension and form that minimises the creation of off- cuts / waste
- o consideration of what will happen to the materials specified when they reach end-of-life. Where possible, elements should be designed for repair, modular repair, recycling at the end of life or safe disposal. The use of hazardous materials should be minimised
- o use of prefabricated elements where possible
- o material reuse (such as concrete, tarmac, timber and landscaping features)
- o any excavated materials will be carefully stored in segregated piles for subsequent reuse on the site wherever possible. These excavated materials should be reused as deposition material for infilling or landscaping
- o avoiding over-purchasing and accurate delivery times, ensuring materials are ordered for delivery shortly before they are used on the proposed development would also avoid possible damage and therefore wastage
- o use of take back schemes, some suppliers offer a take back scheme, which should be utilised where practicable, particularly for packaging and pallets.

Additionally, the following strategies are recommended to be considered for the purpose of waste reduction during the operational phase:

- o exploring segregation of organic waste from the residual stream within commercial premises
- o exploring the viability of small-scale organic waste treatment. Treatment via composting has the potential to recycle the organic waste into a product which may be used within the development green areas, offset the use of imported materials and reduce emissions due to transport and disposal
- o introduction of paper and cardboard balers in buildings with high paper and cardboard usage
- o facilities management may engage with the City of Parramatta or private contractors in delivery of waste handling training to increase awareness of waste avoidance activities for both staff, residents and visitors.

## Proposed OSD-specific Measure

Aboriginal cultural heritage	<p>The submitted ACHAR makes the following recommendations:</p> <ul style="list-style-type: none"> <li>o further assessment of Aboriginal archaeological heritage values is not required.</li> <li>o following the results of the consultation process, the Connecting with Country framework should be adopted for the future design process</li> <li>o if changes are made to the proposal that may result in impacts to areas not assessed by this ACHAR further assessment would be required.</li> <li>o if Aboriginal objects, or potential objects, are uncovered during the proposed development, all work in the vicinity must cease immediately and The Sydney Metro Unexpected Heritage Finds Procedure followed.</li> <li>o if human remains, or suspected human remains, are found during the proposed development, all work in the vicinity should cease, the site should be secured, and the NSW Police and Heritage NSW should be notified, and The Sydney Metro Unexpected Heritage Finds Procedure and Exhumation Management Procedure should be followed.</li> </ul>
Environmental Heritage	<p>The following mitigation measures are to guide the design of future Detailed SSDA(s):</p> <p>All Buildings</p> <ul style="list-style-type: none"> <li>o Implement the advice of a suitably qualified heritage architect in the development of future building design and the adaptive reuse of the heritage structure (Building A) and Kia Ora (Building D)</li> <li>o The Adaptive Reuse Strategy and Conservation Management Plans (CMP) prepared for Shops (I703) and Kia Ora (I716) prepared under the Stage 3 CSSI are required to be considered in the Detailed SSDA(s) for the site.</li> <li>o Detailed SSDA(s) are to provide specific guidelines for development within the building envelope and its interface with the heritage structure</li> </ul>
Construction Management	<p>A robust Construction Management Plan is to be implemented as part of future Detailed SSDA(s), including ensuring good communication channels with the community and stakeholders during the construction process.</p>
Social and economic impacts	<p>Any future Detailed SSDA(s) should ensure good communication channels with the community and stakeholders during the construction process in line with the procedures and initiatives outlined in the SIA.</p>

## Appendix C – Summary schedule of DAP advice to Concept SSDA design, project responses

Seven (7) DAP meetings were held during the evolution of the Concept SSDA building envelopes, Indicative Reference Scheme and Update Over & Adjacent Design Guidelines for the Paramatta metro station site. Key areas of design advice from DAP relating to the Concept SSDA include:

- Podium and street wall heights
- Tower envelopes
- Wind mitigation
- Laneway width
- Building entries and prominence
- Connecting with Country guidance
- Heritage interfaces to Kia Ora

Date	DAP Feedback	Project response
<b>Podium and Street Wall Height</b>		
12 April 2023	<p>1.1 The DAP requested clear principles for the design of interfaces with the plaza, surrounding streets and built form be established within the Parramatta Metro Over and Adjacent Station Development Guidelines (Design Guidelines) regarding:</p> <ul style="list-style-type: none"> <li>• Framing and responding to adjacent public domain</li> <li>• Sensitively responding in scale and design to adjacent heritage items</li> <li>• Optimising active facades interfacing with key streets and public domain; and</li> <li>• Positively contributing to the amenity and environmental conditions of adjoining public domain.</li> </ul>	<p>1.1 Objectives and design guidance for podium design has been strengthened within Section 2.2 of the Design Guidelines.</p>
2 November 2023 1 March 2024	<p>1.2 The DAP proposed an adjustment of podium heights to respond to the principle of framing the public domain with a consistent podium, and a scale appropriate for the public space. It was acknowledged that a step down in podium height at the corners may be appropriate to manage a sensitive heritage interface.</p> <p>The DAP suggested that a consistent podium height at RL33 to New Horwood Place be adopted, noting the RL is fixed by plant services.</p>	<p>1.2 Section 2.2 of the Design Guidelines and associated diagrams have been amended to support a consistent podium height to New Horwood Place at RL 33 with allowance for heights to step down at George Street, Macquarie Street, and new laneways to support a sensitive heritage interface, respond the adjoining street scale and laneway conditions.</p>

Date	DAP Feedback	Project response
24 April 2024	<p>1.3 The DAP requested the following information to be included within the Parramatta Over and Adjacent Design Guidelines:</p> <ul style="list-style-type: none"> <li>• Further guidance establishing a strong masonry character and vertical articulation of the podiums.</li> <li>• Reconsideration of the definition of 2 storey heritage alignments, considering aligning with heights at the street edge, rather than setback roof ridgelines.</li> <li>• Prioritise service cores to be located away from New Horwood Place and the Civic Link.</li> </ul>	<p>1.3 New guidance has been provided in Section 2.2 of the Design Guidelines in response to DAP's comment.</p>
24 April 2024	<p>1.4 Define precise dimensions and setbacks for podiums in diagrams.</p>	<p>1.4 Critical dimensions have been provided in Section 2.3 of the Design Guidelines to set out the locations of podiums and tower setbacks that relate to the SSDA scope.</p>
<b>Tower Envelope</b>		
16 June 2021	<p>2.1 The DAP recommended consideration of amenity and viability of the substantially large floor plates.</p>	<p>2.1 The SSDA seeks approval for building envelopes. Detailed design will define the floor plate size which will be informed by market analysis and sounding for A-Grade office requirements in Parramatta CBD. Section 2.2 and 2.3 of the Design Guidelines provides guidance and objectives relevant to podium and tower forms to guide appropriate articulation amenity outcomes.</p>
10 November 2021	<p>2.2 The DAP was encouraged by the articulation of the towers as stepped volumes to respond to sun access planes to the existing Parramatta Square and as an attempt to break down the scale of the buildings, noting a preference for the three-volume option.</p>	<p>2.2 Noted.</p>
27 September 2023	<p>2.3 The DAP supported the linear alignment of Horwood Place, noting that the alignment comes at the expense of achieving built form setbacks between towers and podiums that are suitable for buildings of the proposed scale and bulk.</p> <p>The DAP noted that a 3m tower setback is insufficient given the towers bulk and</p>	<p>2.3 A minimum tower setback of 3m has been established in alignment with Parramatta DCP 2023.</p>

Date	DAP Feedback	Project response
	<p>scale and wouldn't be perceptible from ground level. The DAP recommended a minimum 6m tower setback.</p>	<p>Section 2.3 of the Design Guidelines embeds objectives and guidance to ensure towers are designed to:</p> <ul style="list-style-type: none"> <li>o Achieve safe and comfortable wind conditions to adjacent streets and public spaces;</li> <li>o Appropriately respond and contribute to the visual amenity of adjacent public spaces; and</li> <li>o Frame adjacent public domain to establish high quality amenity and comfort for future users.</li> </ul>
<p>16 June 2021 2 November 2023</p>	<p>2.4 The DAP notes that the proposal of a new civic-scaled open space for the Parramatta City Centre is a once in a generation opportunity to transform Parramatta into a city with a series of open spaces of distinctive character and scale.</p> <p>The DAP supports the strategy of locating the majority of the built form to the west of the site to enable dedication of a large public space between George Street and Macquarie Street.</p>	<p>2.4 Noted.</p>
<p>1 March 2024</p>	<p>2.5 The DAP generally supports the principle of providing the mix of green roofscapes including accessible, inaccessible, and mixed mode spaces.</p>	<p>2.5 Noted.</p>
<p>24 April 2024</p>	<p>2.6 The DAP noted that the 500mm flexible façade zone presumed on all elevations of building envelopes would increase the visual bulk and scale of the buildings and result in a negative impact on the public realm.</p> <p>The DAP advised that articulation of podiums must be within the planning envelopes.</p>	<p>2.6 New guidance has been included in the Design Guidelines that limits minor projections into the building setbacks (up to 500mm) for architectural features, sun shading devices and non-habitable building elements.</p> <p>This has also been annotated on the Concept SSDA building envelope drawings.</p>

Date	DAP Feedback	Project response
24 April 2024	2.7 The DAP requested clarification of the planning envelopes, Gross Building Area (GBA) and GFA for each individual building be provided in the Design Guidelines.	2.7 The proposed GFA is discussed in further detail in Section 3.3.2 of the Submissions Report. GBA is generally a term not used for planning purposes.
<b>Wind Mitigation</b>		
27 September 2023	3.1 The DAP generally supports the wind mitigation strategies presented to avoid covered laneways.	3.1 Noted.
12 April 2023 1 March 2024 24 April 2024	3.2 The DAP noted that wind mitigation should not rely on porous screens, trees, or other public domain elements, but should be mitigated by built form modulation. The DAP advised that clearer guidance be included in the Design Guidelines.	3.2 The Design Guidelines provides objectives and guidance to ensure towers are designed to achieve safe and comfortable wind conditions in adjacent streets and surrounding public spaces. Refer Section 2.3 of the Design Guidelines.  This is reinforced through podium design guidance in section 2.2 which requires future detailed design to integrate design solutions that provide weather and wind protection for pedestrians.
<b>East-west laneway</b>		
1 March 2024	4.1 The DAP acknowledged that the east-west laneway provides an alternate scale to those found within the Parramatta CBD. The DAP suggested further coordination of retail space depth, seating allocation and pedestrian circulation paths.	4.1 The East-west Laneway has been designed in line with the Civic Link Special Area public domain requirements established within the Parramatta DCP 2023. Laneways and public domain throughout the precinct will be resolved through detailed design of the Stage 3 CSSI.
1 March 2024	4.2 The DAP requested information regarding the provision of pedestrian weather protection along the east-west link.	4.2 Section 2.2 of Design Guidelines has been amended to provide guidance for podium designs to integrate a continuous awning for the comfort and amenity of pedestrians, inclusive of laneways.



Date	DAP Feedback	Project response
<b>Building entries</b>		
1 March 2024	5.1 The DAP highlighted the necessity of defining which direction commercial buildings address in relation to the location of the 'front door.' It was noted that the preference was to address a street or major public space. The DAP requested that the main address and 'front door' of each commercial building should be defined, particularly Buildings D and A.	5.1 The Design Guidelines have been amended to provide guidance on the location of principal building entries which should be prominently located fronting Civic Link, new plazas or primary streets being Church, George and Macquarie Street. Further, guidance around creating a distinction between the principal and secondary address is provided. Refer to section 2.7 of the Design Guidelines.
1 March 2024	5.2 The DAP suggested opportunities to minimise the 'blank' edge condition of the internal lobby link in Buildings D and A be explored.	5.2 Section 3.1 of the Design Guidelines includes precinct wide Design with Country Opportunities which includes opportunities for a feature lobby wall. The design of the internal lobby link within Building A will form part of a future detailed SSDA. The Building D podium forms part of the CSSI scope and future lobby links will be designed and documented in the SDPP.
<b>Connecting with Country</b>		
2 November 2023	6.1 The DAP requested that strategies should be developed from the 'SMW Parramatta Designing with Country' document to communities and connect to countries within the building towers (e.g., Sky Country and sky gardens).	6.1 Additional objectives and guidance have been embedded into the Design Guidelines informed by the SMW Parramatta Designing with Country document, including guidance for the design of podiums and towers.

Date	DAP Feedback	Project response
<b>Heritage – Kia Ora</b>		
20 October 2021	8.1 The DAP suggested activation of the northern side of Kia Ora be explored to address its relationship with the public realm.	8.1 The Concept SSDA includes Kia Ora site to support its future adaptive reuse. Activation of the northern portion of Kia Ora will be guided by the Conservation Management Plan (CMP) prepared under the Stage 3 CSSI and will form part of a future Development Application.
24 April 2024	8.2 The DAP requested additional guidance to be provided within the Design Guidelines about how the Kia Ora Heritage Interface Zone and Heritage Curtilage Zone interface with requirements for the broader public domain.	8.2 Section 3.3 of the Design Guidelines has been amended to remove the Kia Ora Interface Zone and adjust the Heritage Curtilage to be consistent with identified significant views. Development within the Heritage Curtilage Zone is to be consistent with the CMP prepared under the Stage 3 CSSI
24 April 2024	8.3 The DAP requested clarification of any requirement to protect views to Kia Ora from the north looking south.	8.3 The CMP prepared under the Stage 3 CSSI Approval guides sensitive views to Kia Ora, including those from the north looking south.
24 April 2024	8.4 The DAP requested clarity on the requirements around the area to the north, particularly what design parameters relating to the Heritage Interface Zone are fixed as opposed to flexible.	8.4 The Kia Ora Heritage Interface Zone has been removed and the site area forming the scope of this SSDA has been revised to be consistent with the historic allotment. The Heritage Curtilage Zone defines the area that is to be guided by the CMP prepared under the Stage 3 CSSI Approval and includes the Kia Ora lot. Any future detailed SSDA for Kia Ora adaptive reuse is required to be consistent with the relevant CMP. This guidance has been embedded in section 3.3 of the Design Guidelines.

## Contact us

If you have any questions or would like more information please contact our project team:

1800 612 173 Community infoline open 24 hours

[sydneymetrowest@transport.nsw.gov.au](mailto:sydneymetrowest@transport.nsw.gov.au)

Sydney Metro West

PO Box K659, Haymarket NSW 1240



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