



APPENDIX A – SUBMISSIONS REGISTER

1. CITY OF PARRAMATTA COUNCIL

The following table sets out a response to each issue raised in the Summary of Recommendations appended to Council's submission dated 22 November 2021.

Table 1 Council Comments

Council Comment	Response	Supporting Documentation (RTS Report Section/ Appendix)
1. Land Use Planning Recommendations		
<p>That the Clause 4.6 request to vary height not be supported for The Core.</p>	<p>The overall design was workshopped in conjunction with Council and SDRP. As result of the SDRP sessions, a height variance was requested to provide a better urban design outcome, whilst maintaining the same amount FSR.</p> <p>An amended Clause 4.6 Variation relating to the core has been prepared by Urbis (Appendix O) which outlines that the proposed height variation provides a range of public benefits and is an acceptable outcome.</p> <p>Council's technical assessment provides further comments in relation to the Clause 4.6 for the Core Precinct. Overall, Council considers that there is inadequate rationale and technical analysis presented to ensure that the exceedance in heights address the benefits as advised by the SDRP and that meet the objectives of Clause 4.3 of the Parramatta LEP 2011.</p> <p>In response to Council's comments, the proposed increases in height are primarily located at the top of the hill within close proximity to the light rail station. The height increases and reductions have been carefully located providing a greater diversity of building forms and height within the town centre, enabling a host of benefits outlined in the Concept Response to Submissions Report prepared by Bates Smart (Appendix F), including:</p>	<p>Section 3.2.1</p> <p>Appendix O</p> <p>Appendix F</p>

Council Comment	Response	Supporting Documentation (RTS Report Section/ Appendix)
	<p><u>Built Form Improvements</u></p> <ul style="list-style-type: none"> ▪ Greater diversity of buildings, form and architectural expression ▪ Increased building separation ▪ Reduced Streetwall Heights ▪ Taller but fewer towers ▪ Reduced tower footprints ▪ Increased slenderness of towers ▪ Fewer apartments per core <p><u>Residential Amenity Improvements</u></p> <ul style="list-style-type: none"> ▪ Increased solar access to apartments ▪ Improved views from apartments <p><u>Public Domain Improvements</u></p> <ul style="list-style-type: none"> ▪ Additional open space ▪ Improved sunlight to open space ▪ Additional open-to-sky mid-block link ▪ Improved visual connectivity to open spaces <p>In summary, the proposed development:</p> <ul style="list-style-type: none"> ▪ Transitions in built form down the hill ▪ Maximises solar access to residential facades ▪ Maintains satisfactory sky exposure ▪ Maintains daylight to key areas of the public domain. <p>Council’s technical assessment also disputes that the height variation creates ‘interest’ and ‘variation’, and does not consider the design to be consistent with the Telopea Master Plan 2017 and subsequent rezoning. The height increases and reductions have been carefully located providing a greater diversity of building forms and height within the</p>	

Council Comment	Response	Supporting Documentation (RTS Report Section/ Appendix)
	<p>town centre, improving views, reinforcing land form and improving solar access in comparison to the homogenous LEP height controls which step down the hill in consistent height planes, obstructing views and solar access.</p> <p><u>Street walls</u></p> <p>Council's technical assessment also states that the 14 storey street wall buildings are too excessive to be considered a perimeter block typology, which is typical between 6- to 8-storeys. The refined scheme does not propose any 14-storey perimeter block buildings. Three (3) 14 storey buildings are proposed across the development:</p> <ul style="list-style-type: none"> ▪ C2.2 which is a 'slab-block' typology with mid-block articulation, ▪ C6.2b is a tower element of a streetwall building at a prominent corner ▪ C7.2 is a local tower <p>All other lower core buildings (within the 40m LEP height plane) are perimeter block buildings with predominantly 8-10 storey street walls. All other upper core buildings (within the 50-70m LEP height plane) are towers on podiums.</p> <p><u>Visual Impacts</u></p> <ul style="list-style-type: none"> ▪ Council's technical assessment of the visual impacts of the Core Precinct note their view that the current buildings are read together as one large mass, rather than defining any views or spaces between buildings. ▪ Whilst height has increased, the proposal provides reduced tower footprints, increased building separation, and reduced streetwall heights which increases sky view from many areas of the public domain and provides a less blocky silhouette. In comparison, an LEP compliant scheme with more towers at the top of the hill, less height variation and larger 	

Council Comment	Response	Supporting Documentation (RTS Report Section/ Appendix)
	<p>building footprints would be read as a slightly shorter but a more contiguous large mass.</p> <p><u>Tower Length</u></p> <p>Council's Technical Assessment notes that the Telopea DCP identifies a maximum tower length of 50 metres, and maximum residential tower floorplate of 1000sqm. The controls also outline a preferred maximum building depth of 24 metres.</p> <p>Generally, envelopes have been designed as 22.5 metres deep if a side core typology has been envisaged and 25 metres deep if a central core typology has been envisaged. The floorplate sizes and tower lengths of the two 25 storey towers are less than 1000sqm and 50m respectively. Where a building length exceeds 50m, generally the overall building form has been designed to either step the building in height and/or provide an articulation zone to clearly articulate two built forms.</p> <p>The residential building above the library, envisaged as an opportunity site with a future Design Excellence Competition, intentionally deviates from the norm as it is an island site flanked by public open space on both sides. Rather than a linear building of consistent depth, the envelope proposes a squarer format to create a central core tower that can be viewed in the round.</p> <p><u>Public benefits associated with Clause 4.6</u></p> <p>Council have stated that there is no apparent additional public open space or public benefit being provided as a result of the height variation. A range of public benefits are noted above and further addressed in the Clause 4.6 Variation relating to the core has been prepared by Urbis (Appendix O). The amended design also incorporates the following changes:</p> <ul style="list-style-type: none"> ▪ The retail plaza has increased from 792sqm to 944sqm (16% increase). ▪ The library plaza has increased from 2,477sqm to 2,750sqm (10% increase). 	

Council Comment	Response	Supporting Documentation (RTS Report Section/ Appendix)
	<p><u>Additional FSR</u></p> <p>Council have noted their concern that by allowing additional height sets an undesirable precedent for the remainder of the Telopea precinct. The Telopea Master Plan 2017 and the recent rezoning never envisaged the FSR bonuses of the SEPP (ARH) 2009 to be applied broadly across the LAHC lands and have requested further information is provided. Section 5.2 of the Submissions Report has provided further information of the provision of FSR across the site including SEPP (ARH) 2009 in response to comments from DPE and Council.</p> <p><u>Street Layouts</u></p> <p>Council has stated that the proposed street layout for the core is not well integrated into the surrounding street network and does not preserve any existing street sightlines, view corridors and connections across the site.</p> <p>The proposed street layout has taken into account many factors including existing streets, tree retention, the topography and contours of the site and overall accessibility and urban design principles to create a more connected street and pedestrian network. Changes to the street layout introduces pedestrian activation along New Marshall Street and the Eyles Link which will replace a cul-de-sac which presently provides no broader connectivity. Overall, the proposal provides an activated and connected street network which provides buildings with clear street addresses.</p> <p><u>Council Block Testing</u></p> <p>It is also noted that Council has undertaken design testing between the proposed scheme and the Telopea Masterplan (2017) to demonstrate the benefits of more efficient street and block layout consistent with the Parramatta LEP 2011. Council's block planning exercise provided has had minimal consideration of ADG compliance and contextual analysis of the site including solar studies, arborist reports, site surveys, civil & infrastructure servicing</p>	

Council Comment	Response	Supporting Documentation (RTS Report Section/ Appendix)
	<p>or any other specialised reports prepared as part of the EIS Package. It is also noted that the proposed scheme has gone through 18 months of consultation with Council with block analysis not forming part of any consultation prior to lodgement.</p>	
<p>The applicant presents a scheduled breakdown of the FSR and GFA allocations (including standard efficiency rates) for each lot within the Concept Area (The Core and Precincts) corresponding to accurate plans and showing that the maximum permissible FSR for each lot has not been exceeded. Noting that this will form the basis for any Concept Approval, and therefore ensuring that the approved envelopes do not risk exceeding permissible density provisions in future development applications. Furthermore, that the proposal demonstrates that it does not draw GFA from the roads shown in the Parramatta LEP 2011 with no allocated FSR.</p>	<p>An outline of how the GFA for the development was calculated is provided in Section 5.2 of the RTS report and Clause 4.6 Exception to FSR Development Standard at Appendix Q.</p> <p>It is noted in Council's technical assessment that they are concerned that by allowing additional height sets an undesirable precedent for the remainder of the Telopea precinct. The Telopea Master Plan 2017 and the recent rezoning never envisaged the FSR bonuses of the SEPP (ARH) 2009 to be applied broadly across the LAHC lands. This has been considered in the amended Clause 4.6 Variations prepared by Urbis with further analysis of GFA also incorporated in Section 5.2 of the Submissions Report.</p>	<p>Section 5.2 Appendix O Appendix P Appendix Q</p>
<p>Council recommends that the Design Excellence Strategy be revised to:</p> <ul style="list-style-type: none"> ▪ Demonstrate compliance with Clause 6.12 Design Excellence of the Parramatta LEP 2011 ▪ That a Council representative is nominated for all Design Competitions, and not 	<p>The Design Excellence Strategy enclosed in Appendix H has been updated to address the design excellence provisions of the PLEP 2011 and comments from Council including their Technical Assessment.</p> <p>A detailed assessment against the provisions of Clause 6.12 of the PLEP 2011 has been provided in Section 5.1 of the Submissions Report.</p> <p>To achieve to the delivery of design excellence, Design Excellence Competitions will be undertaken for three strategically important sites across the Telopea CPA, including:</p>	<p>Appendix H Section 5.1</p>

Council Comment	Response	Supporting Documentation (RTS Report Section/ Appendix)
<p>just the future Council library site.</p> <ul style="list-style-type: none"> ▪ That the Government Architect of NSW nominate their preferred process and timing for Design Review and that the strategy be updated to reflect GANSW requirements. ▪ Design Juries should have an odd number of members and should not be dominated by parties representing the applicant. 	<ul style="list-style-type: none"> ▪ Buildings C1 and C2 and Telopea Square (Core site) ▪ Building C3 (future Council Library site) ▪ Other within North or South Precinct (location to be determined) <p>It is also proposed to involve Council as an observer at all competitions and to include them on the selection panel for the future library site.</p> <p>It is intended that each future stage of development will follow the SDRP process. Feedback from the GANSW following the third SDRP session on the design excellence strategy was that they were supportive of <i>“the overall approach to design excellence.”</i></p> <p>Furthermore, all future applications within the Telopea Precinct will demonstrate design excellence against the provisions outlines in Clause 6.12.</p>	
<p>That the SDRP provide written certification that the submitted Detailed Development Application for Stage 1A has appropriately addressed the panel’s recommendations.</p>	<p>Written advice was prepared by the SDRP following the design review session held on 12 August 2021. This advice confirmed that the SDRP were generally supportive of the design development of Stage 1A, including proposed architectural character, material strategies and diversity of apartment types is generally supported by the SDRP.</p>	<p>Appendix Q</p>
<p>That the delivery timeframes for new housing in Stage 3 should be reconsidered to be brought forward, based on current condition of the existing housing stock in this area.</p>	<p>The current timing is based on both market conditions and obligations to LAHC. The staging has been designed to ensure that affordable housing proposed in Stage 3 is not isolated from surrounding services.</p>	<p>Appendix E of the original EIS Package Appendix BB</p>
<p>2. State and Local Contributions (VPA Letter of Offers) Recommendations</p>		
<p>The development should contribute to the provision of local infrastructure to meet the demand from increased residential and worker</p>	<p>Current VPA discussions for the SSDA Concept Plan and Stage 1A works have been based on the relevant contributions based on the July 2021 lodgement date. As such, the current contributions are in excess of the requirements under the</p>	<p>Section 3.1.2</p>

Council Comment	Response	Supporting Documentation (RTS Report Section/ Appendix)
population as a direct result from the development. This contribution should be equal or greater in value than the development contributions payable under the Parramatta (Outside CBD) Contributions Plan 2021.	<i>Parramatta (Outside CBD) Contributions Plan 2021.</i>	
That negotiations continue between LAHC/ Frasers and Council in relation to the Revised Letter of Offer (VPA).	This is noted by the Proponent.	No additional information required
That no approval be issued for the development prior to the agreement of Council to enter into a VPA with the applicant.	This is noted by the Proponent, however both the Proponent and Council have expressed the ability to draft a condition of consent to bond contribution to avoid VPA negotiations delaying the overall planning approval.	No additional information required
Transport for NSW and the Department of Education and/or School Infrastructure NSW, consult with Council in relation to the allocation of funding which may be of co-benefit to the local community.	This is noted by the Proponent. Ongoing discussions with other state agencies form part of the State VPA.	No additional information required
3. Property and Legal Matters Recommendations		
That in accordance with Section 8 of the SEARs the legal mechanisms which guide the process for NSW LAHC to acquire Council's roads and Council's property at 21 Sturt Street should be outlined.	The preferred approach by both parties is compulsory acquisition with the precursor being the land is nominated in the VPA and/or a separate Deed is entered into.	Section 3.1.2
That 21 Sturt Street and the proposed 'land swap' be removed from the VPA letter of offer.	This is noted. The agreed approach by both parties is compulsory acquisition, and will form part of ongoing negotiations between the Proponent and Council.	Section 3.1.2

Council Comment	Response	Supporting Documentation (RTS Report Section/ Appendix)
4. Urban Design Recommendation		
<p>That the applicant revise the design of the Core to more closely reflect the Telopea Master Plan 2017 and controls within the Parramatta LEP 2011. 4.2</p>	<p>Further assessment of the proposed scheme against the Telopea Masterplan forms part of the Concept Response to Submissions Report prepared by Bates Smart (Appendix F). Overall, the scheme is considered in comparison to an LEP compliant scheme, the additional height proposal better celebrates the built form principles established in the 2017 Telopea Masterplan including:</p> <ul style="list-style-type: none"> ▪ Taller built form on the ridge gives better views, reinforces land form and balances solar access. ▪ Homogeneous height built form will obstruct views and solar access. ▪ Thinner and taller built form casts longer fast moving. <p>Council's technical assessment has used a standard efficiency rate to calculate the GFA from the Envelope Plan (75% for residential, 85% for commercial and ground floors are often calculated on a case-by-case basis as they can range from 30%-60%).</p> <p>The efficiency of a typical residential level has been measured and results in a 73% efficiency rate, which exceeds the 70% rate identified in the ADG and is generally consistent with Council's calculations. The upper core towers provide a slightly lower efficiency rate of 70% to provide more flexibility at the top of the hill. The overall efficiency averages at 69% is primarily due to:</p> <ul style="list-style-type: none"> ▪ Large retail envelopes to allow for maximum flexibility. ▪ Multiple ground levels for non-residential uses. ▪ The steep terrain which impacts the usability of deep envelopes on lower ground levels. 	<p>Section 3.2 Appendix E Appendix F</p>

Council Comment	Response	Supporting Documentation (RTS Report Section/ Appendix)
<p>That the applicant revise the design of the Precincts consistent with the Telopea DCP.</p>	<p>As this project is designated as State significant, in accordance with Clause 11 of the SDR SEPP, DCPs do not apply to any State significant development and are not a relevant matter for consideration for the SSDA.</p> <p>It is also noted that the Draft DCP was on public exhibition between 19 May 2021 and 17 June 2021 with the DCP adopted following a Council meeting held on 11 October 2021. While the public exhibition occurred prior to formal lodgement, the Proponent has been involved in ongoing design development over the past 18 months including ongoing discussions with Parramatta Council and three design review sessions with the SDRP on:</p> <ul style="list-style-type: none"> ▪ 1 April 2021 ▪ 16 June 2021 ▪ 12 August 2021 <p>Given the rigorous design review undertaken by the Proponent prior to lodgement, further assessment against DCP controls which are not a formal matter for consideration is considered to not meet the objectives of the SSDA process.</p>	<p>Appendix U</p>
<p>The Applicant revises the isolated lots study which demonstrates development outcomes consistent with Council's Telopea DCP</p>	<p>The current isolated lot study prepared by Bates Smart as part of the original EIS Package has considered the relevant DCP controls for sites outside of the Telopea Concept Plan Area demonstrates that the potentially isolated sites are not isolates as they can be reasonably developed either as standalone sites or amalgamated with neighbouring sites. It is noted that further assessment of potential isolated lots would form part of future detailed development applications. Given the size of the Telopea CPA, parts of the site are unlikely to be developed for ten years and undertaking further work now is considered unnecessary to assess the proposed concept envelopes.</p>	<p>Section 5.5</p>

Council Comment	Response	Supporting Documentation (RTS Report Section/ Appendix)
<p>That the applicant prepares a site purchase strategy to demonstrate that efforts will be made to acquire any isolated sites and potential amalgamation to occur.</p>	<p>Prior to the development of the master plan, acquisition was raised with other lots surrounding the Telopea CPA.</p> <p>The overall scheme has been designed based on land currently owned by LAHC and does not burden the future redevelopment of land not incorporated into the proposal. Requiring the Proponent to demonstrate attempts to acquire additional lots is beyond the scope of the SSSA. The proposal does not burden existing land owners from redeveloping sites surrounding the Telopea CPA.</p>	<p>Section 5.6</p>
<p>The applicant presents urban design testing of the Evans Road (Waratah) shops block (bounded by Evans Road, Benaud Place, Shortland and Sturt Streets) to demonstrate that the proposal does not adversely impact on the realisation of development potential in line with the controls of the Parramatta LEP 2011 and Telopea DCP. In particular, that the building separation and visual privacy distances contained Apartment Design Guide (ADG) of SEPP 65 are able to be satisfied, as measured from the centre of Benaud Lane.</p>	<p>Refinements to the design described in Section 3.2 include the reduction of upper level setbacks along Benaud Lane to ensure compliance with the ADG can be achieved. Further urban design testing is not considered appropriate at the Concept Stage and will likely form part of future detailed development applications for Buildings C7 and C8.</p>	<p>Section 3.2 Appendix E Appendix F</p>
<p>5. Public Domain Recommendations</p>		
<p>The public domain plans should be revised in relation to the comments provided in Technical Assessment at Attachment B, including but not limited to the following:</p> <ul style="list-style-type: none"> ▪ Clarification of all public domain works that will 	<p>Public domain plans have been updated by Hassell (Appendix M) to reflect Council's comments with the overall design and documentation meeting the requirements as set out in Chapter 2, 2.3 Development Application of the <i>Parramatta Public Domain Guidelines</i>.</p> <p>It is noted that the VPA offer is still under negotiation between the Proponent and Council. As</p>	<p>Appendix M Appendix GG2 of the original EIS Package Section 3.2 Appendix E</p>

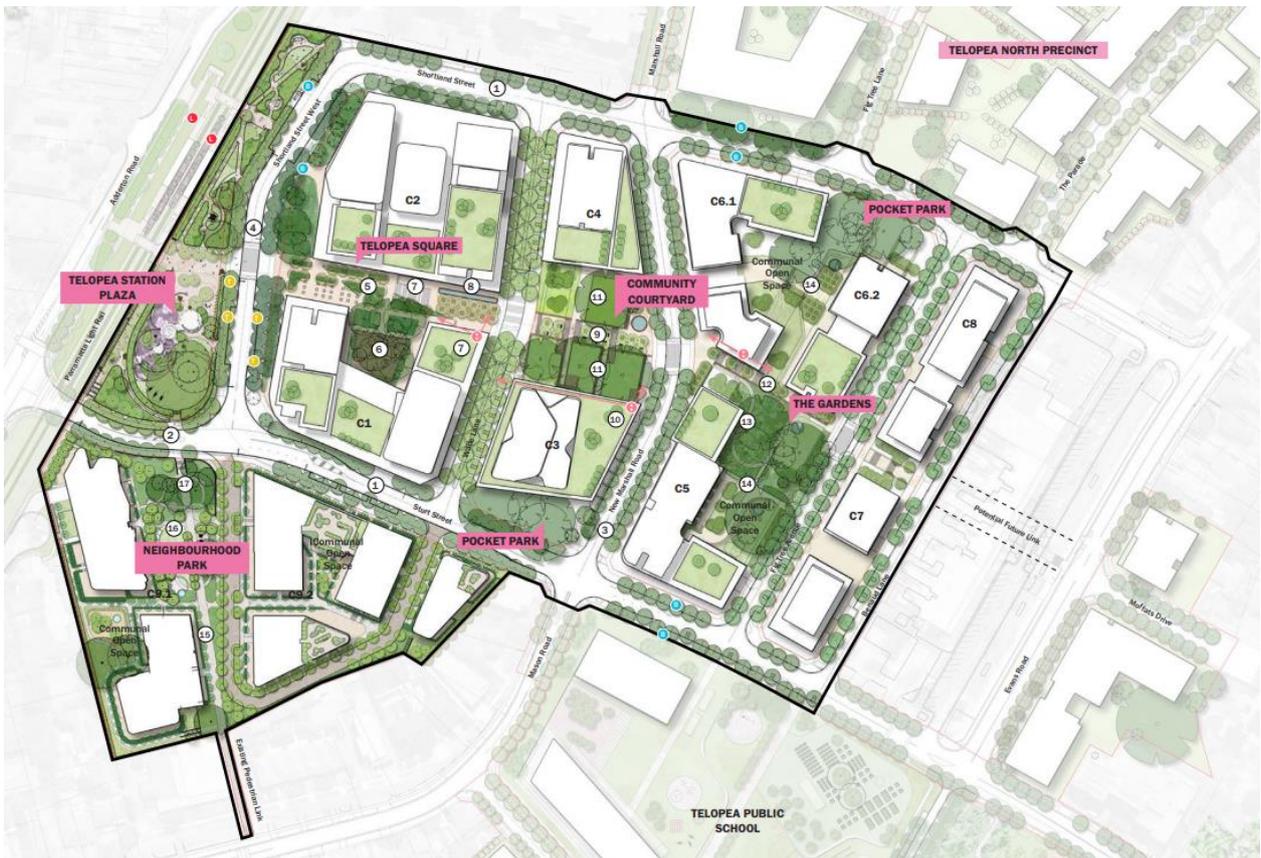
Council Comment	Response	Supporting Documentation (RTS Report Section/ Appendix)
<p>be delivered as part the Stage 1 approved DA,</p> <ul style="list-style-type: none"> ▪ Clarification of public domain works that will be delivered as part the Stage 1 approved VPA Offer, ▪ That the design and documentation meet the requirements as set out in Chapter 2, 2.3 Development Application of the Parramatta Public Domain Guidelines i.e.: <ul style="list-style-type: none"> ○ minimum 60% resolved public domain layout design with dimensions, materials, typical details etc, and ○ full resolved alignment plans. ▪ Both the approved DA and VPA layout design and documentation should be fully coordinated and any subsequent adjacent stages (layout plans at 60% resolved design plus preliminary civil engineering design). 	<p>part of these discussions the extent of public domain works to be delivered as part of Stage 1A of the SSDA is being clarified.</p> <p><u>Stage 1A Design</u></p> <p>Council's technical assessment notes that Council supports the schematic design suggested for the public domain for Stage 1A however the level of finish is higher than Council would normally permit which has ongoing maintenance and budget implications. To reflect Council's comments, the following information has been prepared in r</p> <ul style="list-style-type: none"> ▪ General Arrangement drawings are drawn to scale. All elements are identified with by both colour and code identified in the legend. ▪ Mews Street is a two way street with a right turn only entry into the Stage 1A carpark and left & right turn exiting the carpark onto the mews. this will be shown clearer on the signage and line marking plans. ▪ An average verge crossfall of 3% is proposed across the site with all paths retaining a crossfall of 2.5% for DDA requirements. If required, this can be condition of consent. ▪ All public domain (streets and parks) to be handed over to Council are located on deep soil, not basement. Where a street is proposed over basement, ie Mews Street, it is intended that part or all of the street as agreed by Council should remain in private ownership. Further discussions will occur as part of ongoing VPA discussions. ▪ Street widths (path and verge) have been designed in alignment with 'PDG Town Centres' guidelines rather than Council's recommendations for minimum widths. If required, a minimum verge width of 3.5m 	<p>Appendix F</p>

Council Comment	Response	Supporting Documentation (RTS Report Section/ Appendix)
	<p>can be introduced as a condition of consent.</p> <ul style="list-style-type: none"> ▪ The pedestrian street is designed in accordance with 'PDG Town Centres' guidelines. The proponent is proposing a far higher level of amenity in the public realm which was encouraged by Council in ongoing VPA negotiations. The granite footpath is in line with the quality of finish desired for the Neighbourhood Park and adjoining residential lots. ▪ Periodic rest points have been introduced along the pedestrian link at Manson Street and other streets as discussed with Council. ▪ On-road mixed-traffic bicycle links are proposed on Sturt and Shortland Streets. The Station Plaza link is designed to accommodate pedestrians and cyclists, but is not a shareway. ▪ Council have recommended that pavement in parks and footpaths separating building edge from the park should be in situ concrete with a minimum width of 1800mm. The proponent is proposing a far higher level of amenity in the public realm which was encouraged by Council in VPA negotiations. ▪ To ensure access to parks is inclusive and equitable, all ramps and stairs and DDA compliant. Where stairs are provided, a 1:20 path is provided adjacent. ▪ Access to all buildings is inclusive and accessible as provided in Accessibility Report prepared as part of the original EIS package. ▪ All kerb ramps to be aim directly to their opposite kerb ramp 	

Council Comment	Response	Supporting Documentation (RTS Report Section/ Appendix)
	<ul style="list-style-type: none"> ▪ In response to Council’s recommendation that any overhead powerlines in the streets should be undergrounded, the proponent is willing to undertake undergrounding if Council include cost of works in VPA. <p><u>Street walls</u></p> <p>As noted above, Council’s technical assessment states that the 14 storey street wall buildings are too excessive to be considered a perimeter block typology, which is typical between 6- to 8-storeys. The refined scheme does not propose any 14-storey perimeter block buildings. Three (3) 14 storey buildings are proposed across the development:</p> <ul style="list-style-type: none"> ▪ C2.2 which is a ‘slab-block’ typology with mid-block articulation. ▪ C6.2b is a tower element of a streetwall building at a prominent corner. ▪ C7.2 is a local tower. <p>All other lower core buildings (within the 40m LEP height plane) are perimeter block buildings with predominantly 8-10 storey street walls. All other upper core buildings (within the 50-70m LEP height plane) are towers on podiums.</p> <p>The lower core buildings are largely consistent with the Telopea Masterplan which defines the core as a “Mixed use and residential core predominantly 8-12 storeys with taller elements at the light rail stop precinct”.</p> <p>It is noted that the SDRP advised following the 12 August meeting that the amenity for residential buildings in the core had improved.</p>	
<p>Public domain improvements directly adjacent to development sites should be included as Conditions of Consent of any approval and not be part of local contributions or the VPA.</p>	<p>This is not agreed to by the Proponent. The proposed public domain improvements are considered well above the average streetscape expectations for a residential development. Overall, the streets have been designed to have noticeable public benefits and are vital to the overall public</p>	<p>Appendix E</p>

Council Comment	Response	Supporting Documentation (RTS Report Section/ Appendix)
	<p>domain strategy for the CPA (refer to Appendix E). Public domain improvements include street furniture, public art installations, cycle ways and generous street tree planting for connected canopies and shade.</p>	

Figure 1 Public Domain Concept



Source: Hassell

6. Open Space Recommendations

<p>A plan of for all proposed open space to be dedicated to Council should be submitted which clearly indicates the extent of dedication to Council and aligns with the proposed subdivision plan, landscape and basement plans. A open space to be dedicated to Council shall</p>	<p>A Dedication Plan (DA01.MP.11 Rev 2) was prepared by Hassell. This plan has been amended to reflect the refinements to the design as part of the Submissions Report Package and can be found enclosed in Appendix T.</p>	<p>Appendix T</p>
--	--	--------------------------

Council Comment	Response	Supporting Documentation (RTS Report Section/ Appendix)
demonstrate that there is no basement encroachment		
<p>Council design recommendations shall be incorporated for the Neighbourhood Park and Arrival Plaza prior to any approval and VPA agreement as outlined in the Technical Assessment at Attachment B.6</p>	<p>This is noted by the Proponent and forms part of current VPA negotiations.</p> <p>As part of the refined design, it is confirmed that a 2,200sqm Hilltop Neighbourhood Park is proposed to be dedicated to Council.</p> <p>In response to Council's comments on the Hilltop Neighbourhood Park:</p> <ul style="list-style-type: none"> ▪ The neighbourhood park is completely located on deep soil with no basement located below. Overall, the extent of lawn has been increased. The area of 'useable' open space (including lawns, break out spaces) totals 540sqm ▪ Three shade canopies, two BBQ facilities and four picnic benches have been provided ▪ Turf area has been increased by reducing garden beds. The water feature has also been removed ▪ A continuous footpath along western edge cannot be accommodated due to change in levels from park to road. Access to Adderton Road is from the western lobby exit or through the Neighbourhood Park ▪ Incidental play elements are retained in the park to ensure adequate activation ▪ All footpaths within the public domain are DDA compliant with grading shown on relevant plans. <p>In response to Council's comments on the Station Arrival Plaza:</p> <ul style="list-style-type: none"> ▪ High quality trees to be retained in accordance with the Aboricultural Report. 	<p>Appendix J</p> <p>Appendix K</p> <p>Appendix L</p> <p>Appendix M</p> <p>Appendix N</p> <p>Appendix EE</p>

Council Comment	Response	Supporting Documentation (RTS Report Section/ Appendix)
	<ul style="list-style-type: none"> ▪ The proposed large outdoor chess set has been replaced with chess table/seat units ▪ Sun benches have been removed in the east-west thoroughfare to station entry and replaced with seating. ▪ Stone pavers will be sealed ▪ All gardens to be provided with irrigation ▪ Furniture are proprietary items, now noted on schedules. In some instances proprietary items are modified - this approach is also taken in the PDG. ▪ Bins are 'general waste' only ▪ Bench seating has been updated to provide backrests and armrest for DDA compliance. ▪ Drinking fountains are wheelchair accessible. ▪ Playground updated to hot-dip galvanised steel powdercoated, indicatively. It is noted that the playground design is indicative only and subject to design development in collaboration with nominated First Nations design collaborator. ▪ Foosball table removed and the proposed table tennis table to be all steel construction including 'net' 	
<p>The community / library courtyard space shall increase in size to include Church courtyard and removal of Sturt St pocket park.</p>	<p>This is noted by the Proponent and forms part of current VPA negotiations.</p>	<p>Appendix I Appendix N</p>
<p>Council supports a public shareway or laneway between New Marshall Road and Benaud Lane.</p>	<p>This is noted by the Proponent.</p>	<p>No additional information required</p>

Council Comment	Response	Supporting Documentation (RTS Report Section/ Appendix)
7.Traffic and Transport		
<p>That the Stage 1A scheme be revised to include additional visitor parking in line with RMS standards and Council DCP.</p>	<p>The Draft Telopea DCP allows for the provision of residential visitor car parking on-street. Given the significant amount of new on-street parking that will be delivered as part of the Concept Plan, and particularly parking within the Telopea Core, the current parking arrangements are considered appropriate for Stage 1A. The DCP requires 45 visitor car spaces for Stage 1A. Overall, Stage 1A provides the following visitor parking:</p> <ul style="list-style-type: none"> ▪ On street spaces – 22 ▪ Carshare spaces (on-street) – 2 ▪ Visitor parking within Stage 1A basement – 23 <p>Overall, the proposal provides 47 potential visitor spaces within the basement and on-street.</p> <p>It is also noted that the SDRP provided commentary in advice dated 30 August 2021, stating that any opportunities for further lowering proposed parking rates, reducing car reliance and prioritising both pedestrian movement and public transit usership is generally supported by the SDRP.</p> <p>The proposed DCP residential visitor parking rate of 1 space per 5 dwellings is not considered appropriate nor sustainable in the context of the Precinct.</p> <p>Regarding this, it is noted that the TfNSW (formerly RMS) Guide states the following:</p> <p><i>“Councils may wish to reduce this requirement for buildings located in close proximity to public transport, or where short-term unit leasing is expected.”</i></p> <p>Telopea qualifies for such consideration, being immediately adjacent to the new Parramatta Light</p>	<p>Section 5.6</p> <p>Appendix U</p> <p>Appendix AA</p>

Council Comment	Response	Supporting Documentation (RTS Report Section/ Appendix)
	<p>Rail (PLR) stop that is also well supported by bus services.</p> <p>Accordingly, the 2021 TAIA adopted a visitor car parking rate of 1 space per 10 dwellings, including any on-street parking available to encourage the use of public transport. It is noteworthy that this is the same rate for visitor parking recommended in the Melrose Park Transport Management & Accessibility Plan (TMAP) – for an almost identical urban renewal project – where a rate of 1 space per 10 units was recommended even though Stage 2 of the PLR was (and remains) not guaranteed.</p> <p>Furthermore, the reduced rate is justified on the basis that the Telopea CPA would also include retail parking and community facilities parking (subject to VPA) in the core of the Precinct. These facilities would be used by visitors for meeting at restaurants, cafes, community centres, etc., in conjunction with visitor parking in the residential buildings.</p> <p>Therefore, even without consideration of the substantial potential for shared parking at different times of the day given the peak demands for the different land use components in the Telopea CPA, it is our opinion that the rate of 1 visitor space per 10 dwellings, including on-street parking, is reasonable and acceptable.</p>	
<p>Stage 1A must prepare a Construction Pedestrian and Traffic Management Plan (CPTMP), including management of construction worker vehicles and parking, prior to the commencement of the works in consultation with Council’s Traffic and Transport Manager</p>	<p>This is accepted by the Proponent and is recommended as a condition of consent.</p>	<p>No additional information required</p>
<p>Stage 1A and all future development stages of the</p>	<p>This is accepted by the Proponent and is recommended as a condition of consent.</p>	<p>No additional information required</p>

Council Comment	Response	Supporting Documentation (RTS Report Section/ Appendix)
Concept Plan submit a Green Travel Plan		
That Stage 1A be amended to remove car parking access via Winter Street and sole basement car park access be via new internal road.	An amended parking access has been provided as part of the overall refinements to the project.	Appendix J Appendix K Appendix L Appendix M Appendix N Appendix EE
Incorporate Council recommended amendments (detailed in Attachment B) to proposed road network changes and either be agreed with Council Officers prior to development approval being granted or conditions be imposed requiring Council endorsements of amended plans prior to construction commencing.	<p>In response to the traffic recommendations from Council, the following refinements are proposed:</p> <ul style="list-style-type: none"> ▪ A minor refinement has been incorporated to the pedestrian refuge island on Sturt Street. ▪ On-street parking has been provided in all suitable locations, with appropriate setbacks to street junctions, corners, pedestrian crossings and driveway entries ▪ The revised plans have been developed in accordance with relevant AS2890 Australian Standards. ▪ Basement carpark access has been removed from Winter Street. Basement carpark access for Stage 1A is available via the internal road on Mews Street. ▪ The median strip on Wade Street is to be widened by 0.5 metres. Kerb and gutter on the eastern side of the street will also be adjusted to provide a minimum 3 metre lane width. ▪ Crossing facilities on Sturt Street North, Wade Street, Marshall Street and Fig tree Lane have been refined to incorporate raised thresholds for speed control. <p>The following items raised in Council's technical assessment will be dealt with in future applications:</p>	Appendix I Appendix N

Council Comment	Response	Supporting Documentation (RTS Report Section/ Appendix)
	<ul style="list-style-type: none"> ▪ All crossing locations are subject to future traffic committee assessment & traffic approvals. ▪ Time restrictions, signage and line markings relating to on street parking requires approval from the traffic committees and should be considered as a condition of consent. ▪ All bus stop locations will be dealt with in subsequent DAs in conjunction with Council and the relevant bus authorities. ▪ Signalisation of the Sturt Street / Manson Street / Marshall Street intersection does not form part of the detailed Stage 1A submission and therefore it is recommended that any warrant assessment be deferred to the future detailed application stage that includes the upgrade of this intersection. <p><u>SIDRA Modelling</u></p> <p>Council also notes there are inconsistencies in the SIDRA modelling undertaken. The majority of upgrades that are proposed (and reported on in the 2021 TAIA) are consistent with the upgrades developed as part of the earlier GTA studies and presented in the Precinct TTA Addendum that supported the approved Planning Proposal. The GTA study assessed a 2036 baseline (i.e. without development traffic) that included upgrades considered necessary to address background traffic growth. Accordingly, the baseline SIDRA results presented include upgrade works, which accounts for the improvement in performance.</p> <p>The 2021 TAIA adopted most of the upgrade works proposed by the Precinct TTA Addendum, noting that the 2021 TAIA - using updated and current traffic generation rates - forecast that the Telopea CPA would generate 30% fewer trips and therefore the upgrades developed by the 2018</p>	

Council Comment	Response	Supporting Documentation (RTS Report Section/ Appendix)
	<p>Precinct TTA Addendum would satisfy the reduced traffic demands of the current Proposal.</p> <p>However, it is noted that the GTA developed upgrades have been modified as part of this application at the Adderton intersections with Manson St and New Link Rd (following discussions with TfNSW); therefore, SIDRA analysis was undertaken at these 2 intersections and hence why there are only results for these intersections in the 2021 TAIA.</p> <p><u>Parking Rates</u></p> <p>Council's technical assessment includes comments on the proposed parking rates. Council states that off-street parking for all stages within the Telopea Precinct is to be provided in accordance with the requirements of the Telopea Precinct Site Specific DCP. As noted in the Submissions Report, the concept masterplan was prepared prior to a DCP being available. The off street parking strategy and current design was based off a number of factors including SDRP comments, retention of trees, site typology, safety and urban design. Further details are provided in Section 5.7 of the Submissions Report.</p> <p><u>Swept Paths</u></p> <p>In response to Council's technical assessment, swept paths and kerbs returns have been prepared for the following intersections to ensure that a 12.5m long vehicle is able to manoeuvre through them in any direction without crossing the centrelines within a road or mounting/overhanging the kerbs:</p> <ul style="list-style-type: none"> ▪ Sturt Street North and Shortland Street ▪ Shortland Street and Marshall Street ▪ Sturt Street, Marshall Street and Manson Street <p>Street trees and other visual obstructions are to be kept clear on all approaches to an intersection to</p>	

Council Comment	Response	Supporting Documentation (RTS Report Section/ Appendix)
	<p>ensure driver sight lines are not obstructed to approaching vehicles and any regulatory signage.</p> <p>Based on Council's comments, the following items are recommended to be incorporated as conditions of consent:</p> <ul style="list-style-type: none"> ▪ On-site parking and loading facilities are to be designed in accordance with the requirements of the AS 2890.1, AS 2890.2 and AS 2890.6. ▪ Where sites have access from a secondary street frontage, parking and servicing access to the sites is to be provided from the secondary street. Access driveways into the sites are to be designed in accordance with the Australian Standard AS 2890.1:2004. All vehicles are to enter and exit the site in a forward direction. ▪ On-site manoeuvring of vehicles into and out of the site and for critical manoeuvring areas within the carpark are to be demonstrated in accordance with Appendix B of AS 2890.1 – 2004 and to be submitted with the final development application for each stage. ▪ Each stage of the Telopea Precinct should provide a Construction Pedestrian and Traffic Management Plan (CPTMP) prior to the commencement of the works to the satisfaction of Council's Traffic and Transport Manager. 	
<p>As part of the approval process submission of documentation to ensure new roads and other roadworks are delivered to Council's standards (Included at the Technical Assessment at Attachment B).</p>	<p>This is noted and accepted by the Proponent.</p>	<p>Appendix I</p>
<p>Sturt and Shortand Streets streetscape upgrades shall</p>	<p>It has been noted in previous discussions between Council and the Proponent that road profiles across</p>	<p>Appendix N</p>

Council Comment	Response	Supporting Documentation (RTS Report Section/ Appendix)
incorporate shared paths to accommodate off road cyclist (and pedestrians) and remove the proposed on-road cycleway (painted).	<p>the Telopea CPA provide for shared paths and/or on-road cycleway to ensure safe and direct access is achieved between all parts of the Telopea CPA and the Parramatta Light Rail Active Transport Corridor.</p> <p>In line with the Parramatta Bike Plan, an on-road mixed traffic cycleway is designed for Shortland Street. An on-road mixed traffic cycleway is also proposed for Sturt Street. While Council recommends an on-road painted cycleway in their technical assessment, this cannot be accommodated within the width of the road reserve. Footpaths on these streets are designed for local site connections only.</p> <p>The overall active transit links across the Telopea CPA provide cyclists with access to the station plaza from the Adderton Road connector road, and the two main entries into the station plaza from Shortland Street West.</p>	
The applicant submit a pedestrian and cycleway drawing / plan clearly indicating all proposed footpaths and cycleways for Stage 1A and Concept Plans.	A plan of all the proposed footpaths and cycleways forms part of the Concept Design Report prepared by Bates Smart and Hassell enclosed in the original SSDA package. The cycleways have been incorporated into the current civil plans for Stage 1A and Concept Plans.	Appendix I
8. Tree Recommendations		
<p>That the Arboricultural Impact Appraisal and Method Statement be revised to:</p> <ul style="list-style-type: none"> ▪ Undertake a thorough and site specific arboricultural management process in accordance with Section 2 of AS4970-2009 Protection of trees on development sites and Council's standard arboricultural reporting requirements as 	<p>Amendments were not required to the existing Arboricultural Impact Appraisal.</p> <p>It is noted that the original Arboricultural Impact Appraisal and Method Statement considered the architectural plans, civil documentation, stormwater and services documentation and landscape documentation.</p>	Appendix V of original EIS package

Council Comment	Response	Supporting Documentation (RTS Report Section/ Appendix)
<p>included in Attachment B Technical Assessment.</p> <ul style="list-style-type: none"> ▪ Update tree schedule to reflect accurate tree data collection and update recommended tree protection areas accordingly. ▪ Take into consideration all available documentation to enable a thorough impact assessment, including but not limited to architectural plan set, Civil documentation, Stormwater and Services documentation and Landscape Documentation. ▪ Guide design modification to ensure all high value trees nominated for retention are adequately retained and protected to ensure longevity within the landscape post development. ▪ Where tree removal is unavoidable, appropriate site-specific arboricultural justification is required for each tree. Recommendations are to be made for replacement within the precinct. 		

Council Comment	Response	Supporting Documentation (RTS Report Section/ Appendix)
<p>The Applicant prepares a Street Tree Master Plan be prepared which defines locations for specific tree species, tree quantities, and provide a preliminary survey information identifying potential conflicts with the trees etc.</p>	<p>The concept masterplan has provided an indicative street tree location, consistent with City of Parramatta Council Street Tree Guide. Trees and groundcover planting will be planted in verges to support local biodiversity while ameliorating the urban heat island effect.</p> <p>Each subsequent detailed DA will provide quantities, survey info and potential conflicts.</p>	<p>Appendix E Appendix EE</p>
<p>9. Social Impacts Recommendation</p>		
<p>The applicant should provide the following information:</p> <ul style="list-style-type: none"> ▪ Via the Design Excellence Strategy outline the approach to proposed tenure blind approach to social and affordable housing; and ▪ That the applicant demonstrates how the Connecting to Country Strategy recommendations are implemented through Stage 1A and Concept Plan 	<p>The impact in the SIA 'community integration, belonging and connection' outlines that a tenure blind approach will be taken by not allocating specific blocks, buildings, facilities or spaces to a particular housing tenure and provides the same design quality for public, communal and private domains across the area.</p> <p>The Connecting with Country strategy provides project specific considerations for the Concept Plan with particular recommendations for Stage 1A incorporated into the landscape plans.</p>	<p>Appendix H Appendix LL of the original EIS Package</p>
<p>Stage 1A be revised to adjust bedroom mix and inclusion of adaptable units in line with the Parramatta DCP 2011.</p>	<p>The current mix of dwellings is consistent with the design guidelines prepared by Bates Smart and Hassell.</p>	<p>Appendix G Appendix EE</p>
<p>That the development staging of the Concept Plan for The Core shall not disrupt continuous service of the existing Dundas Library and Neighbourhood Centre until such time a new Library and Community facility is operational.</p>	<p>This is noted and accepted by the Proponent and forms part of current VPA negotiations.</p>	<p>No further information required</p>

Council Comment	Response	Supporting Documentation (RTS Report Section/ Appendix)
10. Sustainability Recommendations		
In relation to Stage 1A development that prior to CC stage the development shall demonstrate electric vehicle ready in line with the requirements of the Parramatta DCP – Section 4.3.Telopea Precinct.	The Proponent fundamentally disagrees with the wording of the draft DCP in relation to sustainability requirements and have advised Council of this on multiple occasions. Notwithstanding this, all buildings including Stage 1A will be future proofed and have allowances for EV charging capabilities.	Appendix J Appendix EE
In relation to Concept Plan – that future development applications demonstrate electric vehicle ready in line with the requirements of the Parramatta DCP – Section 4.3.Telopea Precinct	As noted above, the Proponent fundamentally disagrees with the wording of the draft DCP in relation to sustainability requirements and have advised Council of this on multiple occasions. Notwithstanding this, all buildings will be future proofed and have allowances for EV charging capabilities.	Appendix E
In relation to Stage 1A development that prior to CC stage the development shall demonstrate dual piping is provided for each apartment	As noted above, the Proponent fundamentally disagrees with the wording of the draft DCP in relation to sustainability requirements and have advised Council of this on multiple occasions. Notwithstanding this, ongoing discussion are occurring with Sydney Water to confirm if dual piping is feasible on site and can be serviced.	Appendix EE
In relation to Concept Plan – that future development application demonstrate that dual piping is provided for each apartment and mixed use building	As noted above, the Proponent fundamentally disagrees with the wording of the draft DCP in relation to sustainability requirements and have advised Council of this on multiple occasions. Notwithstanding this, ongoing discussion are occurring with Sydney Water to confirm if dual piping is feasible on site and can be serviced	Appendix E
In relation to Stage 1A development that prior to CC stage the development shall demonstrate dual piping is provided for each apartment.	This comment is incorporated twice in Council's response.	Appendix EE
In relation to Concept Plan: <ul style="list-style-type: none"> ▪ That future development 	As noted above, the Proponent fundamentally disagrees with the wording of the draft DCP in relation to sustainability requirements and have advised Council of this on multiple occasions.	Appendix E

Council Comment	Response	Supporting Documentation (RTS Report Section/ Appendix)
<p>application demonstrate that dual piping is provided for each apartment and mixed use building.</p> <ul style="list-style-type: none"> ▪ That future development applications address urban heat controls as per Council's DCP10 	<p>Notwithstanding this, ongoing discussion are occurring with Sydney Water to confirm if dual piping is feasible on site and can be serviced.</p>	
<p>That the application commit to higher BASIX targets for water and energy</p>	<p>In accordance with <i>SEPP (Building Sustainability Index: BASIX) 2004</i>, higher BASIX targets cannot be enforced. Notwithstanding this, the Proponent has always aimed to achieve sustainable outcomes across the CPA with sustainability forming a critical part of the design principles for the site. The design principles set the following provisions for development across the site:</p> <ul style="list-style-type: none"> ▪ Achieve 5 Star Green Star Design & As Built v1.2 minimum for all residential buildings including provisions such as: ▪ BASIX Energy 30 (on average) ▪ BASIX Water 40 (on average) *If recycled water becomes available to connect to, BASIX water 45 (on average) will be provided. ▪ NatHERS 7-star (on average) – NABERS 6 star energy and 5 star water (where applicable) 2. ▪ Achieve 6 Star Green Star Communities v1.1 for the precinct 	<p>Appendix FF2 and FF3 of the original EIS Package</p>
<p>Stamped BASIXs plans shall be provided as part of the Stage 1A application.</p>	<p>A copy of the Stage 1A BASIX Plans will be provided to DPE once the overall design is accepted by DPE.</p>	<p>No further information required</p>
<p>In relation to Stage 1A development that prior to CC stage the development shall</p>	<p>This is accepted by the Proponent and is recommended as a condition of consent.</p>	<p>No further information required</p>

Council Comment	Response	Supporting Documentation (RTS Report Section/ Appendix)
confirm that all cooktops are induction type.		
11. Biodiversity Recommendations		
Further justification is required from the applicant as to why a Biodiversity Offsets Scheme is not triggered and a Biodiversity Development Assessment Report is not required	Further details are incorporated into the BDAR waiver prepared by ACS Environmental and Urbis	Appendix Y
In relation to Blue Gum High Forest, the direct or indirect impacts must be adequately assessed in accordance with the Biodiversity Assessment Method under a Biodiversity Development Assessment Report (unless a waiver is granted).	The current Blue Gums have been planted for aesthetic purposes and are not native to the site. These trees occur among many other non-locally occurring canopy species in a managed curtilage with no associated native species (no composition score), low structural integrity (no understorey or native ground cover) and a low ecological functionality (no tree hollows, no litter, no sapling regeneration, no habitat logs on the ground). Further details are incorporated into the BDAR waiver prepared by ACS Environmental and Urbis.	Appendix Y
A Biodiversity Management Plan be prepared and accompany future development applications for the Concept Area.	This is not agreed by the Proponent. A Biodiversity Development Assessment Report (BDAR) waiver has been prepared and accompanies this report as Appendix Y which expands on the outcomes of the Biodiversity Assessment provided as Appendix U of the EIS.	Appendix Y Appendix U of the original EIS Package
12. Contamination		
It is recommended that City of Parramatta Council (CoPC) Contaminated Land Policy and Procedure is considered and referenced for each stage of development.	This is noted and will form part of future detailed DAs for the site.	No further information required
The applicant prepare detailed site investigation (DSI) covering soil, groundwater and subsurface gas is prepared prior to the release and approval of	A Detailed Site Investigation (DSI) was conducted by Environmental Earth Sciences, whereby an intrusive soil investigation was undertaken as part of the original EIS Package.	Appendix Z2 of the original EIS Package

Council Comment	Response	Supporting Documentation (RTS Report Section/ Appendix)
<p>each stage of the development to inform potential risks to human health and the environment in the context of overall redevelopment of the site. A copy of all contamination reports, remediation action plans and validation reports be provided to Council for stakeholder review and comment.</p>	<p>This investigation was undertaken following a Due Diligence investigation completed by Environmental Earth Science, Due Diligence of Proposed Telopea Master Plan Site, Telopea NSW, Frasers Property Australia (ref: 119095_V2; dated 8 November 2019).</p> <p>The due diligence investigation comprised the drilling of 11 boreholes around potential areas of concern and the installation of four groundwater wells upgradient and down gradient of a former dry cleaner and mechanics workshop. The investigation indicated that groundwater was not impacted by historical activities. The upgradient groundwater wells are located down hydraulic gradient of Telopea Stage 1A. With no groundwater contamination recorded and no potential groundwater sources present in the Stage 1A area, no further groundwater investigation is deemed necessary.</p> <p>The historical use of Stage 1A as a residential area with open space areas, it was also not deemed necessary to assess for subsurface gas as the main contaminant of concern was asbestos in the form of bonded ACM and fibres due to:</p> <ul style="list-style-type: none"> ▪ Uncontrolled fill material located in the south western corner of the site; and ▪ Incomplete disposal of historic building rubble in the area north of Stage 1A." 	
<p>The applicant prepare a detailed site investigation for all land proposed for dedication as parks and open space to identify any potential areas of concern with respect to contamination and inform a conceptual site model (CSM). The DSI must inform potential risks to human health and the environment in the context of</p>	<p>The site investigation comprised a detailed site walkover of the Stage 1A to identify any areas of visible fill material or distressed vegetation, which could indicate the presence of contamination. No areas were identified.</p> <p>Following the walkover, 11 of the 28 locations were sampled and analysed in the areas that will be dedicated as parks and open space areas: HA4 – HA5, HA8 – HA9, HA11 – HA12, HA16 – HA18 and HA21 – HA22.</p>	<p>Appendix Z2 of the original EIS Package</p>

Council Comment	Response	Supporting Documentation (RTS Report Section/ Appendix)
open space and recreational landuse.	Results were all reported below the public open space land use criteria and no anthropogenic material was observed.	
It is recommended that the applicant appoint an NSW EPA accredited site auditor to independently review all detailed site investigation reports, remediation action plans and validation actions prepared for each stage of the Development.	<p>Asbestos-containing material (ACM) was observed north of Stage 1A.</p> <p>Environmental Earth Sciences NSW considers there to be a Moderate 1 risk to human receptors in identified areas of the site due to localised bonded asbestos present both on the ground surface and within shallow soils, associated with residential buildings. However, this localised contamination can be managed during development under a Construction Environmental Management Plan (CEMP) with the preparation of an Asbestos Management Plan (AMP) for the removal of localised ACM identified in fill material in the south-western corner. Following this an inspection and validation of surrounding residual soils prior to development works to ensure bonded fragments are removed from both areas.</p> <p>Due to the limited contamination identified within the Stage 1A subject site, Environmental Earth Sciences do not consider that a NSW EPA Accredited Auditor is required for the proposed development.</p>	<p>N/A.</p> <p>No further information required</p>
A Site Audit Statement must verify that each stage of the land release is suitable for any specified use or range of uses, what management is required before the land is suitable for any specified use or range of uses and identify the person or authority responsible for current and any ongoing and future management of land contamination and remediation within each stage the project precinct.	Due to the limited contamination identified within the Stage 1A subject site, Environmental Earth Sciences do not consider that a NSW EPA Accredited Auditor is required for the proposed development.	Appendix Z2 of the original EIS Package

Council Comment	Response	Supporting Documentation (RTS Report Section/ Appendix)
13. Drainage and Catchment Management Recommendations		
<p>The applicant shall demonstrate how the development complies with Council's <i>Local Floodplain Risk Management Policy</i>, Parramatta LEP 2011 and DCP 2011, as well as all relevant principles and guidelines outlined in the NSW Floodplain Development Manual Dated April 2005.</p>	<p>The Flood Assessment prepared by BG&E as part of the SSDA Package made reference to the controls within the Parramatta LEP, Parramatta City Council Floodplain Risk Management Policy and Parramatta DCP.</p> <p>The addendum flood report provides additional information in response to Council's submission.</p>	<p>Appendix R</p> <p>Along with Appendix DD of the original EIS Package</p>
<p>The Flood Assessment Report shall be updated to include the requirements outlined in the Technical Assessment at Attachment B.</p>	<p>An addenda flood report has been prepared by BG&E to reflect Council's technical assessment including:</p> <ul style="list-style-type: none"> ▪ A comparison of ARR87 and ARR2019 adopted parameters and justification as to why the current ARR2019 study is most accurate. ▪ Incorporation of a climate change scenario with sea level rise should be adopted included in accordance with the industry guidelines and latest DPE recommended requirements. ▪ For culverts, the application of blockage should be in accordance with ARR 2019 guidelines and the design flood level at the subject site should be higher of blocked and unblocked scenario. <p>It is also noted:</p> <ul style="list-style-type: none"> ▪ Detailed Hydraulic pipe design and overland flow assessment will be done at construction certificate stage. The parameters will be based on Council's design guidelines and AR&R. ▪ Flood planning levels for the creek are summarised in Section 4.3 of the Masterplan Flood Assessment (S20156-REP-HYD-0001 Rev C 10/11/2020) and 	<p>Appendix R</p>

Council Comment	Response	Supporting Documentation (RTS Report Section/ Appendix)
	<p>includes 500 mm freeboard above the 1% AEP flood level.</p> <ul style="list-style-type: none"> ▪ Tailwater conditions are described in Table 2 of the Masterplan Flood Assessment (S20156-REP-HYD-0001 Rev C 10/11/2020). The boundary is more than 400 mm downstream of Kissing Point Road. Sensitivity reducing the boundary slope from 0.9% to 0.5% shows there is no difference in the reported water levels at the site. ▪ There are no flood impacts for creek flooding as a result of the development as the Telopea Estate lots are located outside of the 1% AEP flood extent as described in Section 3.1 of the Masterplan Flood Assessment (S20156-REP-HYD-0001 Rev C 10/11/2020). Overland flows to be addressed by JWP. BG&E scope for Creek only 	
<p>The Integrated Water Management Plan should be updated to include the requirements outlined in the Technical Assessment at Attachment B.</p>	<p>The IWMP supports the "core" and Stage 1A developments only. Separate IWMP's will be prepared to support future stages of the Telopea CPA.</p> <p>An integrated DRAINS model will be prepared at the detail design stage to assess the proposed Stage 1A and "core" masterplan water cycle elements in the context of the surrounding public stormwater infrastructure. This will consist of the area surrounding the Stage 1A and "core" masterplan and not the entire Telopea CPA.</p> <p>It is noted that only three (3) of the proposed basins are located within public roads with the other three (3) being located within the private Stage 1A development and the future park area to the north of the New Link Road. The basins proposed in the public roads treat/detain only the stormwater captured in the public road itself and is, therefore, the most practical location for these devices. It would be an unnecessary development burden and</p>	<p>No further information required</p>

Council Comment	Response	Supporting Documentation (RTS Report Section/ Appendix)
	<p>unreasonable to require public stormwater to be detained in private land.</p> <p>It is noted that underground tanks can be accessed and maintained safely with the appropriate traffic control that would be required for works in a public road.</p>	
<p>The applicant shall prepare a full DRAINS model to demonstrate adequacy and appropriateness of drainage infrastructures in public roads in accordance with the requirements outlined in Technical Assessment at Attachment B and submitted for Council's review</p>	<p>An integrated DRAINS model will be prepared at the detail design stage to assess the proposed Stage 1A and "core" masterplan water cycle elements in the context of the surrounding public stormwater infrastructure. This will consist of the area surrounding the Stage 1A and "core" masterplan and not the entire Telopea CPA.</p> <p>Appropriate tailwater conditions will be applied at the detail design stage. Sea Level Rise and climate change assessments are not necessary for the DRAINS model. We would suggest that these can be assessed in the flood assessment.</p> <p>In accordance with Council's technical assessment:</p> <ul style="list-style-type: none"> ▪ All private and public drainage infrastructures need to be design for 5% AEP with 50% blockage in sag pits and 20% blockage in on-grade pits with safe overland flow paths defined for the 1% AEP. ▪ All stormwater drainage design details are to be in accordance with council standard drawings. All public domain stormwater drainage pipe types are to be Reinforced Concrete Spigot and Socket Rubber Ring type pipes to the appropriate Class of pipes needed to address fill and traffic loading requirements. ▪ A hydraulic pipe assessment will be completed at the detail design stage. 	<p>No further information required</p>
<p>The development shall demonstrate compliance with the water quality treatment measurements and targets contained in the Telopea DCP</p>	<p>A copy of the MUSIC model is attached as Appendix FF.</p> <p>The MUSIC model prepared in the IWMP supports Stage 1A and the "core" areas only. Separate</p>	<p>Appendix FF</p>

Council Comment	Response	Supporting Documentation (RTS Report Section/ Appendix)
<p>Section on Water Sensitive Urban Design (WSUD). An electronic copy of MUSIC Model along with a brief report and sub-catchment plans for WSUD elements should be included.</p>	<p>models will be prepared to support the future development stages of the Telopea CPA.</p> <p>We note that the Telopea Draft DCP is inconsistent with the Parramatta DCP in terms of pollutant reduction targets. The Telopea Draft DCP requires reductions which far exceed the industry standard. We also note that the Telopea DCP targets far exceed the targets adopted in the 'Telopea Master Plan Flooding & Watercycle Management Report' (Mott MacDonald 2017).</p> <p>The StormFilter chambers are co-located with the underground OSD tanks as they treat only the public road itself, and not private development stormwater. This is with the exception of the two (2) devices located within the Stage 1A site which will remain privately owned. The use of StormFilters as water quality treatment controls are common place in most LGA's across NSW. Above ground, non proprietary devices are an unnecessary burden for the development.</p> <p>We note that StormFilter devices only require inspection once every 6 months and a minor service once every 12 months.</p> <p>Underground tanks can be accessed and maintained safely with the appropriate traffic control that would be required for works in a public road.</p>	
<p>Matters relating to the assessment and design of Stage 1A shall comply with Council's requirements outline in Technical Assessment (Section 12.5) at Attachment B.13.7</p> <p>Matters relating to hand over of future Council owned assets shall comply with Council's requirements outline in Technical Assessment (Section 12.6) at Attachment B.</p>	<p>In response to the numbered items:</p> <p>a) Current VPA discussions for the SSDA Concept Plan and Stage 1A works include confirmation of private and public infrastructure</p> <p>b) This is accepted by the Proponent and is recommended as a condition of consent prior to CC.</p> <p>c) The proponent intends to engage a private certifier for these works. Certification to be provided to Council upon completion.</p>	<p>No further information required</p>

Council Comment	Response	Supporting Documentation (RTS Report Section/ Appendix)
<p>a) A map clearly showing private road and infrastructures (WSUD elements, basins and so on) separated with public road and public infrastructures should be included in the submission</p> <p>b) All stormwater drainage pit designs to comply with Council's Standard Drawings.</p> <p>c) All stormwater drainage pit and pipes are to be inspected by Council's Engineer prior to backfill. The applicant must provide 24-hour notice prior to any inspection. Inspection of the works will be required on the following stages:</p> <p>i. On construction of the stormwater drainage pipe prior to backfilling of trench.</p> <p>ii. On construction of formwork to any drainage pit(s) prior to Placement of concrete.</p> <p>iii. On construction of any formwork to concrete pavement, footpath, driveway, kerb and gutter etc. and prior to placement of concrete.</p> <p>d) The Developer is to provide to council copies of all trenches backfill compaction test results by a NATA approved laboratory.</p> <p>e) On Completion of works the Developer is to provide council a copy of a CCTV condition assessment Report and video of the constructed pit and pipe stormwater drainage system.</p>	<p>I - iii - Noted - although it is the intention that private certifier will be engaged and provide required documentation.</p> <p>d - j) This is accepted by the Proponent and is recommended as a condition of consent prior to the issue of a Construction Certificate.</p>	

Council Comment	Response	Supporting Documentation (RTS Report Section/ Appendix)
<p>f) The Developer is to provide to council photographic evidence of the constructed stormwater pits and pipes prior to backfill, if requested by Council.</p> <p>g) On Completion of works the Developer is to provide to council Work-as-Executed drawings prepared and signed off by a Registered Surveyor and include the Surveyors Registration Number and date signed.</p> <p>h) The Developer provide Structural Certification for stormwater drainage pits exceeding 2.5 metres in depth or where concrete beams or insets are required.</p> <p>i) New stormwater assets that will become council infrastructure need to be identified in the Stormwater Asset Handover Register and submitted to council on completion of works.</p> <p>j) Council will not accept the works unless all above information is provided to Council and that the works are deemed to be satisfactory."</p>		
14. Waste Management Recommendations		
<p>Stage 1A development is required to increase the footprint of the waste holding area to accommodate a 60L/dwelling per week generation rate for recycling.</p>	<p>In Section 4.0 Residential Flat Buildings of the City of Parramatta Council <i>Waste Management Guidelines for new Development Applications 2016</i>, page 8 'Submission Requirements', the following is stated:</p>	<p>Appendix II of the original EIS Package</p>

Council Comment	Response	Supporting Documentation (RTS Report Section/ Appendix)
	<p>4.1 Waste Management Plan</p> <p><i>4.1.1 Expected volumes and types of waste to be generated from use of the site.</i></p> <p>Waste generation rates of 80 Litres/unit/week for general garbage and 40 Litres/unit/week for co-mingled recycling should be applied when calculating the waste storage requirements for the development.</p> <p>These are the figures used in the Proponent's calculations and included in the waste plan. There is no mention in the Council Guidelines of 60 L per dwelling per week for recyclables. As result, the waste management plan complies with the Council guidelines, and no changes are required.</p>	
<p>The applicant is to provide further details in relation to waste truck access to Stage 1A as detailed in Technical Assessment at Attachment B.</p>	<p>Access for waste vehicles (up to 12.5m HRV) can enter Stage 1A via the basement entrance and can enter and exit in a forward motion via the use of a turntable.</p> <p>The use of a turntable for service vehicle trucks is acceptable as it permitted under relevant Australian Standard and is used at a number of developments within Greater Sydney including elsewhere in the City of Parramatta.</p> <p>Conversely, to design for a 12.5m HRV truck to enter in a forward direction, manoeuvre on-site for loading and then exit in a forward direction would result in a significant impact of the development and would represent a poor design outcome for a vehicle that only occasionally requires access to the Site.</p> <p>Further information is enclosed in the Traffic and Parking Addendum Report.</p>	<p>Appendix AA</p>

2. TRANSPORT FOR NSW (TFNSW)

The following table sets out a response to each issue raised by TfNSW in correspondence dated 20 December 2021. It is also noted that TfNSW has reviewed the submitted application and is unable to provide approval for new traffic signals under Section 87 of the Roads Act 1993.

Table 2 TfNSW Comments

TfNSW Comment	Response	Supporting Documentation
<p>It is noted that this SSD only seeks consent for the signalised intersection of Adderton Road/New Link Road but Section 6.8 of the submitted traffic report states “The road upgrades detailed in Section 6.2 above would be completed prior to the anticipated completion of Stage 1A in 2026/2027, as will the other key road network upgrades as detailed in Table 17 and of course the Parramatta Light Rail will have commenced services.”</p> <p>Accordingly, SIDRA modelling and Warrants Assessments must be submitted for TfNSW review as part of this SSD.</p>	<p>Only the signalised intersection of Adderton Rd with New Link Rd is proposed to be delivered as part of this Stage 1A proposal.</p> <p>Due to the proximity of - and coordination with - the PLR, traffic signal control of this intersection is considered the only safe arrangement for the intersection. It is understood that this has been acknowledged for some time and as a result, earlier concept plans for this intersection, including those assessed by the GTA studies that informed the approved Planning Proposal, have proposed traffic signal control.</p>	<p>Appendix AA</p>
<p>A warrants assessment for Adderton Road/New Link Road, Adderton Road/Mason Street, Mason Street/Sturt Street and Shortland Street/Evans Road should be submitted to TfNSW for review. A warrant assessment will need to be undertaken as per the ‘Traffic Signal Design Manual, Section 2 Warrants’ and the applicant needs to confirm at which stage of the development proposal the warrants for signal will be met at each proposed location.</p> <p>It should be noted that the Road Network Upgrade Schedule in Section 5.12.2 of the submitted Traffic and Accessibility Impact Assessment (TAIA) report proposes most road upgrades to be completed by 2023. Warrants assessments should be carried out on the volume of traffic in the year that the signals are proposed to be operation, or signals should be installed if and when warrants are met.</p>	<p>Consistent with the comments above, the earlier GTA studies that informed the approved Planning Proposal adopted traffic signal controls at these intersections; therefore, the current Proposal remains consistent with the earlier concept plans.</p> <p>Only the signalised intersection of Adderton Rd with New Link Rd is to be delivered as part of Stage 1A and as mentioned above, traffic signal control is required on road safety grounds due to the proximity of and coordination with the PLR.</p> <p>The remaining signalised intersections are to be delivered as part of future detailed applications. It is therefore recommended that any requirement to provide a warrant assessment be deferred to these future detailed applications.</p>	<p>Appendix AA</p>

TfNSW Comment	Response	Supporting Documentation
<p>Revised Residential Trip Generation rates presented in Table 14 of the submitted TAIA indicate that traffic generation for residential uses represent a reduction from the trips assigned in the Precinct TTA Addendum by 35% due to close proximity to Telopea Station. Traffic generation rates for social housing have been similarly discounted from TTA Addendum rates. TfNSW is seeking further explanation to justify how these traffic generation rates were determined and what benchmarking was used. It is assumed that car parking will still be provided for the proposed social housing.</p>	<p>Section 5.5 of the 2021 TAIA covers in detail the justification for the residential trip rates adopted. It is also noted that trip rates referenced in the TAIA were agreed to by TfNSW as part of the development of the Melrose Park Transport Management & Accessibility Plan (TMAP).</p> <p>It is noted that the trip rates effectively include a safety margin. For example, the adopted 0.25 peak hour trips per 'market' dwelling (consistent with the Melrose Park TMAP) could be 40% greater (0.35 peak hour trips per dwelling) and the total forecast volume of peak hour traffic generation would still be lower than that forecast by the Precinct TTA Addendum."</p>	<p>Appendix AA</p>
<p>Submitted SIDRA modelling showing the intersection performance of surrounding signalised intersections does not consider cumulative traffic impacts in Telopea to represent a cumulative impact assessment. It is noted in the submitted TAIA that "It is assumed all trips entering and exiting the New Link Road are associated with development trips as per the Precinct TTA Addendum's analysis. As such, these modelled New Link Road trips have been used as the basis of the trip distribution for the revised Telopea CPA Stage 1 traffic generation." New Link Road will provide a significant road connection between Adderton Road and the Telopea Town Centre and traffic modelling should consider background traffic growth in addition to development traffic to represent actual trip distributions.</p>	<p>The traffic demand modelling for the intersection of Adderton Rd with New Link Rd has adopted the traffic demand forecast by the 2018 Precinct TTA Addendum, which in turn included estimates of future traffic growth for year 2036. Accordingly, the SIDRA analysis undertaken includes development traffic and background traffic growth.</p>	<p>Appendix AA</p>
<p>The proposed location of the new signals on Adderton Road/New Link Road is within substandard proximity (minimum of 130m) to the existing signalised mid-block pedestrian crossing on Adderton Road, north of Roberts Street. TfNSW is concerned the proposed location can</p>	<p>As noted above, the signalised intersection of Adderton Rd with New Link Rd is required on road safety grounds due to the proximity of and coordination with the PLR.</p>	<p>Appendix AA</p>

TfNSW Comment	Response	Supporting Documentation
<p>result in the see-through effect and create a safety hazard.</p> <p>The combined operation of the existing mid-block signalised crossing and the proposed New Link Road/Adderton Road intersection should be considered in amended SIDRA modelling. It is also noted that the length of the southbound left turn bay on Adderton Road is proposed to be 100m long and will extend into the existing mid-block crossing.</p>		
<p>SIDRA modelling for all proposed signalised intersections has not been submitted for review. Modelling should assess forecast impacts on road safety and capacity of the road network, including consideration of cumulative traffic impacts at key intersections using SIDRA or a similar traffic model as prescribed by TfNSW. The traffic modelling should consider the scenarios of baseline year, year 2026, 2031, 2036 and the year until the facility cease operation. Any intersection upgrade works assumed to be undertaken by TfNSW by a certain date on the classified road that are unfunded will need to be removed from the traffic modelling. This is to ensure that an accurate assessment is undertaken of the cumulative impact of this development on the existing classified road network</p>	<p>The majority of upgrades that are proposed (and reported on in the 2021 TAIA) are consistent with the upgrades developed as part of the earlier GTA studies and presented in the Precinct TTA Addendum that supported the approved Planning Proposal.</p> <p>The 2021 TAIA adopted most of the upgrade works proposed by the Precinct TTA Addendum, noting that the 2021 TAIA - using updated and current traffic generation rates - forecast that the Telopea CPA would generate 30% fewer trips and therefore the upgrades developed by the 2018 Precinct TTA Addendum would satisfy the reduced traffic demands of the current Proposal.</p> <p>However, it is noted that the GTA developed upgrades have been modified as part of this application at the Adderton intersections with Manson St and New Link Rd (following discussions with TfNSW); therefore, SIDRA analysis was undertaken at these 2 intersections and hence why there are only results for these intersections in the 2021 TAIA.</p>	<p>Appendix AA</p>
<p>It is noted that Section 2.3.1 of the TAIA states the following relating to Existing Road Network Performance – Traffic Surveys:</p> <p>“At the above 5 mid-block locations, the following data were collected for 7 days,</p>	<p>The survey dates were outside of the Greater Sydney lockdown which did not come into place until 26 June 2021. Previously, the Parramatta local government area (LGA) where the surveys were undertaken was not</p>	<p>Appendix AA</p>

TfNSW Comment	Response	Supporting Documentation
<p>between 16 June to 23 June 2021” Transport for NSW notes that the traffic survey undertaken by the proponent was during the COVID-19 pandemic. Traffic volumes across the Sydney road network throughout the year 2020, including when the survey was undertaken, were abnormally low due to the impacts of COVID-19. The use of a singular point of data collection may not be a true representation of the existing parking and traffic demand generated by the site as stated in Section 2.3.1.</p> <p>TfNSW recommends the proponent revises the TAIA to use traffic data from a wider sample of dates during a period pre-Covid or post-Covid. If the proponent is unable to source this data, the provided should be adjusted to account for reduced traffic volumes due to COVID-19.</p>	<p>restricted. In this regard, the surveys are considered to be reflective of standard conditions.</p>	
<p>There is little information about the expected flows of different populations in and out of the precinct, where their key destinations or origins would be, and how this aligns with different transport options including the Parramatta Light Rail (PLR). Such information affects viability of different transport options and their ability to accommodate the trip demand of the Telopea Concept Plan, in particular PLR, which has not been considered in the TAIA.</p> <p>The TAIA should be amended to undertake the following:</p> <ul style="list-style-type: none"> ▪ Detail key destinations/origins that would involve travel to or from the precinct and determine potential to use different modes of transport for these trips (including cost and time associated with the trips). ▪ Model the transport options and potential trips generated based on mode share targets and 	<p>Comprehensive information regarding mode share trips, key origins and destinations and their respective mode splits are provided in Sections 4 & 5 of the 2021 TAIA. These sections also include commentary on the PLR and the proximity of the PLR to the Proposal is accounted for in the trip rate assessment.</p>	<p>Appendix AA</p>

TfNSW Comment	Response	Supporting Documentation
<p>desirability of modes for different destinations to determine how the full number of trips during the AM and PM peak periods of the Telopea Concept Plan will affect the passenger capacity of PLR and nearby bus services and active transport infrastructure, including identifying the ability of PLR/bus services ability to accommodate increased passenger volumes from the development.</p>		
<p>Submitted traffic signal design does not indicate the signalised pedestrian crossing over the PLR line.</p>	<p>Civil Plans prepared by JWP (Appendix I) show signals at the intersection of Adderton and New Link Road all three legs have pedestrian crossings</p>	<p>Appendix I Appendix N</p>
<p>The cross section of Adderton Road including the PLR line should be submitted for review to confirm adequate storage space in the road reserve for pedestrians is provided.</p>	<p>The requested information has been incorporated into the Civil Plans prepared by JWP (Appendix I)</p>	<p>Appendix I Appendix N</p>
<p>The stop line on the intersection layouts for Adderton Road/New Road should be located as close to the intersection as possible to minimise inter-green time and improve sight distances.</p>	<p>Stop lines have been kept at the same location to ensure no vehicles stop on the PLR. T1 direction lines have been added to the intersection to better guide vehicles to the correct lane.</p>	<p>Appendix I Appendix N</p>
<p>The TAIA does not state that the proposed New Link Road across the PLR and proposed New Link Road/Adderton Rd/light rail intersection have been considered in the design and operation of PLR (including acceptance from the PLR SOM contractor) and therefore it is not clear if any potential impacts to light rail have been considered.</p> <p>The TAIA should confirm if the proposed New Link Road across the PLR and proposed New Link Road/Adderton Rd/light rail intersection have been considered in the design and operation of the PLR (including acceptance from the PLR SOM contractor) and identify their</p>	<p>The SIDRA modelling of Adderton Road / New Link Road / Light Rails level crossing intersection was carried out based on our discussion with TfNSW on 13 July 2021 meeting. In that meeting, TfNSW confirmed model input parameters with particular focus on PLR level crossing such as Light Rail operational frequencies, cycle time, signal phasing (with prioritising light rail movements), minimum green time and walk times for pedestrians etc. Meeting minutes have been appended in Attachment 4.</p> <p>It is our understanding that TfNSW will review modelling inputs / outcomes and</p>	<p>Appendix AA</p>

TfNSW Comment	Response	Supporting Documentation
potential impacts to light rail and subsequent mitigation measures.	forward them to the PLR SOM contractor for further review.	
<p>TfNSW has previously advised that the proposed New Link Road/Adderton Rd/light rail intersection requires two exit lanes from the New Link Road to optimise the signal operation. Left Lane = left turn : Right Lane = right turn. This has not been shown in the intersection design in the TAIA.</p> <p>If an alternative options to at-grade crossings through the Parramatta Light Rail corridor is not possible, the proposed New Link Road/Adderton Rd/light rail intersection should be amended in the TAIA to two exit lanes from the New Link Road in the configuration of Left Lane = left turn : Right Lane = right turn</p>	<p>SIDRA modelling based on the demand inputs from the earlier GTA studies forecast that the intersection can operate satisfactorily with a single lane on the New Link Rd approach for left & right-turning traffic.</p> <p>Furthermore, it is intended that the New Road Link will connect the areas of Telopea either side of the PLR and will not to provide a 'regional' route for wider network traffic; therefore, it is recommended that the single approach lane be maintained to avoid the use of New Link Rd as a through traffic route.</p>	Appendix AA
<p>TfNSW has previously advised that the proposed New Link Road/Adderton Rd/light rail intersection requires two exit lanes from the New Link Road to optimise the signal operation. Left Lane = left turn : Right Lane = right turn. This has not been shown in the intersection design in the TAIA.</p> <p>TfNSW has also previously provided a copy of the signal phasing for the signals at Sunnyholt Road/ James Cook Drive (attached) which is a similar intersection layout to the proposed New Link Road/Adderton Rd/light rail intersection, instead involving a bus T-Way rather than a light rail. It is advised that the phasing is a result of the many delays we had following the initial phasing at the intersection. This should be provided to the proponent to support the aforementioned required intersection design change.</p>	<p>As noted above, it is recommended that the single approach lane be maintained to avoid the use of New Link Rd as a through traffic route.</p> <p>Furthermore, the models were developed in accordance with the supplied TCS plan of Sunnyholt Road/ James Cook Drive intersection as per TfNSW advice. SIDRA modelling of the intersection confirms satisfactory performance in terms of delays and queues.</p>	Appendix AA
It is noted that the proposed development is located immediately adjacent to the	Design associated with light rail crossing is provided as part of the stage 1A DA documentation in line with the MOU	Appendix I Appendix N

TfNSW Comment	Response	Supporting Documentation
<p>Parramatta Light Rail (PLR) corridor. It is advised that:</p> <ul style="list-style-type: none"> ▪ The introduction of additional at-grade signalised crossings across the Parramatta Light Rail corridor has the potential to impact service reliability and travel times. ▪ Detailed intersection design in Figure 19 is unclear due to the images low resolution and unable to be adequately examined at this time. However, it appears that the only one 3m wide lane in each direction is proposed across the PLR corridor. <p>The proponent should consider alternative options to at-grade crossings through the Parramatta Light Rail corridor in order to meet the precincts access requirements. The proponent needs to also consider a design which would enable buses to travel through the intersection to service the precinct.</p>	<p>between LAHC and Parramatta light rail. As noted above, the design of this intersection has had consideration for the Precinct's access requirements.</p>	<p>Appendix AA</p>
<p>Mode share targets could be improved, particularly for cycling and walking. There is potential to reduce the trips generated by private vehicles (particularly local trips) and therefore improve the network performance, and reduce both on-street and off-street parking requirements. The TAIA should be amended to undertake the following:</p> <ul style="list-style-type: none"> ▪ Increase mode share targets for active transport and decrease mode share target for cars. ▪ Consider how these mode share targets will change network requirements, with some contingency where needed. ▪ Consider reducing the parking rates with a maximum rather than a minimum rate, and introducing parking management initiatives to 	<p>Mode share targets have been set to reflect the proximity of the PLR; these are detailed in Section 4.4 of the 2021 TAIA and the affect the PLR would on reduce trip rates is covered in Section 5.5 of the 2021 TAIA. Discussion on the impact of the mode split is discussed in Section 5.10 of the TAIA.</p> <p>The car parking rates of the draft Telopea DCP have been adopted and this is covered in Section 6.4 of the 2021 TAIA. It is noted that the draft DCP proposes reduced car parking rates the intention of which is to manage traffic demand on the local road network.</p> <p>The visitor bicycle parking rates and provision are detailed in Table 28 of the 2021 TAIA.</p>	<p>Appendix AA</p>

TfNSW Comment	Response	Supporting Documentation
<p>de-incentivise driving where possible.</p> <ul style="list-style-type: none"> ▪ Clarify visitor bikes parking rates required and provided 		
<p>Additional cars will impact on reliability for buses that will use Sturt Street in the future (route 545 – 8 min service during the peak). TfNSW currently receives complaints about reliability for this route. Measures to minimise impact to the reliability of route 545 should be considered in the TAIA.</p>	<p>The design of the Master Plan has accounted for all necessary bus movements.</p> <p>Regarding any potential impact on bus service timetables, it is important to consider the overall Public Transport Accessibility Level (PTAL) and the significant improvement to PTAL arising from the PLR and the reduced demand the PLR will have bus services such as the 545 service, which share Parramatta CBD as a key destination.</p>	<p>Appendix AA</p>
<p>The TAIA mentions green initiatives such as cycleways to support the development. It is advised that surrounding streets that are currently traversed by buses (Sturt/Marshal/Evans) will not accommodate a cycleway and buses. The inability of Sturt/Marshal/Evans streets to accommodate buses and cycleways needs to be considered in the TAIA and cycleways located on other streets instead.</p>	<p>Green initiatives are discussed in further detail, in particular cycleways, in Section 6.9 of the TAIA.</p>	<p>Appendix T of the original EIS Package</p> <p>Appendix AA</p>
<p>The Stage 1A development includes 1xHRV and 1xSRV spaces to support the freight and servicing of the development. It is advised that this provision is considered inadequate to support the demand of the development and requires a third vehicle space. This could be in the form of a B99 vehicle space. The development should be amended to provide an additional freight and service vehicle space which could be in the form of a B99 vehicle space.</p> <p>It is also requested that the applicant be conditioned to prepare a Loading and Servicing Management Plan for the review and endorsement of TfNSW, prior</p>	<p>The provision of loading bays is compliant with the relevant and applicable authorities and is therefore acceptable. Notwithstanding this, a Loading and Servicing Management Plan will be provided in response to a suitable condition of consent.</p>	<p>No further information required</p>

TfNSW Comment	Response	Supporting Documentation
<p>to the issue of any Occupation Certificate. The plan needs to ensure that any potential impacts to the operation of the SLR from the development's loading and servicing vehicles are mitigated.</p> <p>Prior to the issue of any occupation certificate, the applicant shall prepare a detailed Loading and Servicing Management Plan in consultation with Customer Journey Planning within TfNSW. The plan shall ensure that any potential impacts to the operation of the PLR from the development's loading and servicing vehicles are mitigated. The applicant shall submit a copy of the final plan to the Executive Director Customer Journey Planning for endorsement. The Plan needs to specify, but not be limited to, the following:</p> <ul style="list-style-type: none"> ▪ Details of the development's loading and servicing profile, including the forecast loading and servicing traffic volumes by vehicle size, frequency, time of day and duration of stay; ▪ Details of loading and servicing facilities that may be required either within the subject site or other sites in the immediate vicinity which adequately accommodate the forecast demand of the development so as to not rely on the kerbside restrictions to conduct the development's business; and ▪ Details of measures to mitigate any potential impacts to the operation of the SLR from the development's loading and servicing vehicles. <p>The Loading and Servicing Management Plan shall be implemented by the</p>		

TfNSW Comment	Response	Supporting Documentation
<p>applicant following the issue of the Occupation Certificate.</p>		
<p>Appendix B of the TAIA shows the proposed intersection upgrades to support the development. Several regular bus routes operate through these intersections along Pennant Hills Road. It is advised that the proposed upgraded intersection design of the following intersections involve the removal of bus priority infrastructure:</p> <ul style="list-style-type: none"> ▪ Pennant Hills Road and Marsden Road ▪ Pennant Hills Road and Jenkins Road <p>It is advised that bus priority infrastructure should be retained in aforementioned intersections and the inclusion of additional bus priority infrastructure for these intersections investigated.</p>	<p>These upgrades do not form part of the Stage 1A application and it is noted that the 2018 Precinct TTA Addendum established that upgrade at this intersections are required to address issue relating to background traffic (including background traffic growth) not the Telopea CPA. Accordingly it is understood that TfNSW will be responsible for these upgrades.</p>	<p>No further information required</p>
<p>Appendix B of the TAIA shows the proposed intersection upgrades to support the development. Several regular bus routes operate through these intersections along Pennant Hills Road and could benefit from an operational perspective from the inclusion of bus priority infrastructure. These intersections include:</p> <ul style="list-style-type: none"> ▪ Pennant Hills Road and Adderton Road ▪ Pennant Hills Road and Coleman Avenue ▪ Pennant Hills Road and Evans Road <p>It is advised that the inclusion of bus priority infrastructure for the a forementioned intersections should be investigated.</p>	<p>These upgrades do not form part of the Stage 1A application and it is noted that the 2018 Precinct TTA Addendum established that upgrade at these intersections are required to address issues relating to background traffic (including background traffic growth) not the Telopea CPA. Accordingly, it is understood that TfNSW will be responsible for these upgrades.</p>	<p>Appendix AA</p>

TfNSW Comment	Response	Supporting Documentation
<p>It is noted that the TAIA states “A green travel plan for Stage 1A would be submitted to Council and DPIE for approval prior to the issue of a Construction Certificate.” It is requested that the proponent consults with TfNSW and also requires TfNSW’s approval prior to the issue of a Construction Certificate. TfNSW will require a precinct-wide green travel plan for the Telopea Concept Plan and a site specific green travel plan for Stage 1A to be prepared and approved by TfNSW as part of its recommended conditions of consent.</p> <p>The TAIA should be amended to state the following – “A precinct-wide green travel plan for the Telopea Concept Plan and a site specific green travel plan for Stage 1A will be submitted to Council, TfNSW and DPIE for approval prior to the issue of the first Construction Certificate.”</p> <p>Prior to the issue of a Construction Certificate, the applicant should prepare a comprehensive precinct wide Green Travel Plan for the Telopea Concept Plan and a site specific Green Travel Plan for Stage 1A Residential, Retail, Child Care, Aged Care in consultation with TfNSW. The plan is required to:</p> <ul style="list-style-type: none"> ▪ Identify strategies and mode share targets that encourage sustainable transport use such as public transport, walking and cycling and reduce the proportion of single occupant car journeys to the site for staff and students; ▪ Include a Transport Access Guide that provides information to staff and students about the range of travel modes access arrangements and supporting facilities that service the site; and ▪ Nominate the party/parties responsible for implementing the 	<p>This is accepted by the Proponent.</p>	<p>No further information required</p>

TfNSW Comment	Response	Supporting Documentation
<p>plan and its ongoing monitoring and review, including the delivery of actions and associated mode share targets.</p>		
<p>A copy of the following plans and documents is requested to further support the assessment of the site and its impact on the rail corridor:</p> <ul style="list-style-type: none"> ▪ A plan showing the offset to the Light Rail Tracks; ▪ A copy of the Civil Stormwater Management Report or Flooding Impact Assessment which sits behind the Civil Drawings submitted; and ▪ Reflectivity and lighting impact assessment to assess the impact to light rail operations. 	<p>Amended Stage 1A Civil Drawings have been prepared by J Wyndam Prince to reflect TfNSW comments.</p>	<p>Appendix N</p>
<p>The design for openings such as balconies and windows on Building E will require risk mitigation of debris being thrown onto rail infrastructure. The Applicant is requested to provide updated drawings/details for Building E, showing anti-throw mechanisms for openings etc. (windows, balconies, terraces, roof top facilities and the like) within 20m facing the rail corridor in accordance with protection of rail corridors in Asset Standards Authority (ASA) Technical Guidelines T HR CI 12090 ST and Development near Rail Corridors and Busy Roads – Interim Guideline.</p>	<p>Fixed screens have been added to the Western facade of building E where it is within 20m of the rail corridor. Refer to note on amended architectural plans enclosed in Appendix EE.</p> <p>Only a part of Building E may be within 20m of the PLR corridor. This requirement could be accepted as a condition of consent, as is typical of these types of requirements.</p>	<p>Appendix EE</p>
<p>Figures presented in Appendix Y3 - Prediction of Ground Movements Under Rail Corridor (Section 3) figures appear that the application of foundation load results in a localised impact on movement (no change in movement at tracks) however, this is not reflected in the results table.</p>	<p>The predicted movements contained within the Section 3 of the TAIA are correct. It is common practice to not show these movements within the figures as visually they are too small. Figures 3,4 and 5 within Section 3 of the TAIA show the heat map of the cumulative movements over the site for the relevant</p>	<p>Appendix T of the original EIS Package</p> <p>Appendix AA</p>

TfNSW Comment	Response	Supporting Documentation
<p>The Applicant is requested to confirm the analysis results in Appendix Y3 – Prediction of Ground Movements Under Rail Corridor (Section 3) presented in the table to confirm they match those presented in Figures 3, 4 and 5 including if the stages reported are correct.</p>	<p>construction stage, not just below the rail tracks.</p>	
<p>Appendix Y3 - Prediction of Ground Movements Under Rail Corridor in the Finite Element Analysis section addressing the detailed cross-section in Figure 2 will require additional information on reduced levels and maximum depth of excavation. The Applicant is requested to update the detailed cross-section in Figure 2 to provide additional information on reduced levels and maximum depth of excavation.</p>	<p>The predicted movements contained within the Section 3 table of the current report prepared as part of the EIS Package are correct. Excavation movements are not generally shown within the figures as visually they are too small. Figures 3,4 and 5 show the heat map of the cumulative movements over the site for the relevant construction stage, not just below the rail tracks.</p>	<p>Appendix Y3 of the original EIS Package</p>
<p>Building E is adjacent and within 25m of the rail corridor, from a geotechnical and ground movement standpoint the proposed berm geometry will need to satisfy the required design life. The Applicant is requested to update Appendix Y3 - Prediction of Ground Movements Under Rail Corridor' (Section 2.2) and Appendix Y1 – Preliminary Geotechnical assessment (page 6) to confirm the proposed berm geometry satisfies the required design life and provide a construction programme and design life for Building E berm adjacent to the rail corridor.</p>	<p>It is recommended this is considered a condition of consent.</p>	<p>No further information required</p>
<p>The Carlingford Rail Corridor is decommissioned and under construction for a new 750V DC light rail system with a high frequency of services and potential stray currents. Additionally, the site is in close proximity to a future traction substation, the likelihood of potential stray current is significantly greater than when the testing was undertaken in May 2021.</p> <p>The Applicant is requested to update the Electrolysis Testing Document (Section 8</p>	<p>Even though the current report is considered accepted, Corrosion Control Engineering have updated the Electrolysis Testing Document accordingly with the comments from TfNSW including:</p> <ul style="list-style-type: none"> ▪ CCE's recommendation to use plastic rather than metallic pipework, or to seal metallic pipework inside non-metallic conduit, are more effective 	<p>Appendix W</p>

TfNSW Comment	Response	Supporting Documentation
<p>Recommendations) and the recommendations should include:</p> <ul style="list-style-type: none"> ▪ Item 1 – heavy plastic membrane and high strength concrete with minimum 50mm cover should not be an either / or option and both should be specified as mandatory to mitigate future corrosion risk; ▪ Item 2 – Incorporate further measures for corrosion hazards to water and fire services can be eliminated by the installation of an insulating fitting, or nonmetallic sections in the water and fire services at or close to the boundary of the property as detailed in the Transport for NSW document T HR EL 12002 GU “Electrolysis from Stray DC Current”, Clause 5.3: “Water and gas pipes servicing buildings on the Railway Corridor and near 1500 V track to have an isolating joint installed at the boundary”; ▪ Requirements for gas services needs to be specified. Gas services if it is metallic construction require fitting with a cathodic protection system incorporating an insulating joint at the meter and if the service is low pressure, can be run in non-metallic pipe; ▪ A new section needs to be added to include metallic reinforcement bar chairs to provide a conductive path for conduction of stray traction currents. Bar chairs should be either plastic or concrete; ▪ Electrical Continuity Testing needs to add a new section to address prior to pouring each concrete element, resistance 	<p>mitigation methods than installing pipework isolating joints as they require periodic testing.</p> <ul style="list-style-type: none"> ▪ Note that there are no mandatory mitigation methods specified in either TfNSW Standard T HR CI 12051 ST 'Development Near Rail Tunnels' CI 9.2.1 or TfNSW Standard T HR CI 12080 ST ' External Developments' CI 6.5. ▪ No gas reticulation is provided in Frasers Developments. ▪ Not necessary, because if the steel reinforcement is protected by resistive barriers (concrete encasement / plastic membrane) as per CCE recommendations, then stray current pickup is either greatly reduced (to insignificant levels) or eliminated. ▪ Permanent ground anchors to be protected by heavy plastic membrane / concrete encasement, as already noted in CCE recommendations. 	

TfNSW Comment	Response	Supporting Documentation
<p>testing should be measured and recorded. Resistance should be less than 2 ohms, as specified in AS2832; and</p> <ul style="list-style-type: none"> ▪ A new section to address how permanent ground anchors will be protected and included in the Report. 		
<p>The Noise Impact Assessment does not identify whether apartments will require alternative ventilation in accordance with “Development Near Rail Corridors and Busy Roads- Interim Guidelines” outlining criteria for when alternative ventilation is required.</p> <p>The Applicant is requested to update the Noise Impact Assessment (Section 6, pg. 14- 16) to address alternative ventilation criteria’s in accordance with “Development Near Rail Corridors and Busy Roads- Interim Guidelines” and clearly identify which apartments require alternative ventilation and how this has been assessed.</p>	<p>Section 6.5 of the Noise Impact Assessment prepared by White Noise Acoustics (Appendix X) has been amended to include the details of the assessment and requirements for the provision of an alternative outside air source to future dwellings within the development.</p>	<p>Appendix X</p>
<p>The Noise Impact Assessment does not provide adequate information on the recommended treatments and how they have been established. The Applicant is requested to update the Noise Impact Assessment (Section 6.1, pg. 15) to clearly outline the assessed external noise levels in relation to its proximity to the Parramatta Light Rail and how the recommended treatments will be established.</p>	<p>Additional comments are included to Section 6 of the revised Noise Impact Assessment prepared by Noise Acoustics (Appendix X), on the recommended façade construction treatments.</p>	<p>Appendix X</p>
<p>There is insufficient information on the reference noise and vibration measurements and its relationship to the site. Reference measurements has been undertaken at curved track where the light rail would likely be travelling slower than for the Parramatta Light Rail (PLR). It should be noted that reference</p>	<p>An assessment of the site and the proximity to the future light rail has been undertaken. Section 5 of the revised Noise Impact Assessment prepared by White Noise Acoustics (Appendix X) includes a review of the Parramatta Light Rail as well as additional measurements</p>	<p>Appendix X</p>

TfNSW Comment	Response	Supporting Documentation
<p>measurements adopted were for a slab track from Sydney Light Rail (SLR) and part of PLR is ballasted track.</p> <p>The Applicant is requested to update the Noise Impact Assessment (Section 5.3, pg. 11) and refer to the PLR EIS to reference the speed of reference measurements and speed for Parramatta Light Rail (PLR) including the ballasted track on PLR. Information should also include the number of light rail pass-bys measured and its relationship with PLR operations. Detailed design drawings showing where the end of the slab track and beginning of ballasted tracks can be provided by TfNSW to address this comment.</p>	<p>undertaken on a strait section of exiting light rail track.</p>	
<p>TfNSW also provides the following comments for consideration in the determination of this application:</p>		
<p>Noting the proposed works would have interface issues with the construction and/or operation of Parramatta Light Rail, the following conditions will be requested to be included in the consent should the application be approved.</p>	<p>Noted.</p>	
<p>Prior to the commencement of works on site, if required by TfNSW, an interface agreement between the Applicant, the Parramatta Light Rail Operator, (and if nominated by TfNSW any other relevant TfNSW Contractor) must be executed. The interface agreement will include, but is not limited to:</p>	<p>Noted, and accepted as an appropriate condition of consent.</p>	
<ul style="list-style-type: none"> ▪ Pre and post construction dilapidation reports; ▪ The need for track possessions; ▪ Review of the machinery to be used during excavation, ground penetration and construction 		

TfNSW Comment	Response	Supporting Documentation
<p>works; o The need for track monitoring;</p> <ul style="list-style-type: none"> ▪ Design and installation of lights, signs and reflective material; ▪ Access by representatives of TfNSW, the Parramatta Light Rail Operator and any other relevant TfNSW Contractor nominated by TfNSW to the site of the approved Development and all structures on that site; ▪ Endorsement of Risk Assessment/Management Plan and Safe Work Method Statements (SWMS); ▪ Endorsement of plans regarding proposed craneage and other aerial operations; ▪ Erection of scaffolding/hoarding; ▪ The rules and procedures of the Parramatta Light Rail Operator and any other relevant TfNSW Contractor nominated by TfNSW; ▪ Parramatta Light Rail Operator's recovery of costs from the Applicant for costs incurred by these parties in relation the Development (e.g. review of designs, shutdown /power outages costs including alternative transport, customer communications, loss of revenue etc) risk assessments and configuration change processes; and ▪ Alteration of rail assets such as the overhead wiring along the track and associated hoarding demarcation system, if undertaken by the Applicant. 		

TfNSW Comment	Response	Supporting Documentation
<ul style="list-style-type: none"> ▪ Prior to the commencement of any works, if required by TfNSW, a Deed Poll will need to be accepted by Parramatta Light Rail Contractors and signed by the Applicant. The Deed Poll will include, but is not limited to: <p>Work Health and Safety provisions including the need for Safe Method Work statements;</p> <ul style="list-style-type: none"> ▪ Parramatta Light Rail access requirements including site works access approval and access permit to work; ▪ Parramatta Light Rail Contractor compliance requirements; ▪ Indemnities and releases; ▪ Insurance requirements and conditions; ▪ Parramatta Light Rail Contractors recovery of costs from the Applicant for costs incurred in relation to the Development (e.g. review of designs, provision of information); ▪ The need to enter into an interface deed or similar with the Parramatta Light Rail Operator when the Parramatta Light Rail project is handed over to the Operator; ▪ Attendance and participation in the construction works risk assessment of construction activities to be performed in, above, about, and/or below the Parramatta Light Rail Corridor. 	<p>Noted, and accepted as an appropriate condition of consent.</p>	
<ul style="list-style-type: none"> ▪ Prior to commencement of works, the applicant must hold current public liability insurance cover of minimum AUD\$ 250 million, 	<p>The Proponent will seek to have further discussions with TfNSW with regard to the insurance coverage put forward in this proposed condition of consent, prior to</p>	

TfNSW Comment	Response	Supporting Documentation
<p>unless otherwise advised by TfNSW, for the entire period of the construction programme. This insurance shall not contain any exclusion in relation to works on or near the rail corridor, rail infrastructure. Prior to issuing the first Construction Certificate the Certifier must witness written proof of this insurance in conjunction with TfNSW's written advice to the applicant on the level of insurance required.</p>	<p>advising DPE on the acceptance of the condition.</p>	
<p>Consultation with TfNSW Light Rail and the PLR operator is to be maintained during the design phase of the New Link Road/Adderton Road signalised intersection.</p>	<p>Noted.</p>	
<p>Prior to Construction Certificate, the Applicant is requested to provide a copy of structural drawings of proposed structures (including retention system) within 25m of the rail corridor to TfNSW.</p>	<p>Noted.</p>	
<p>It is requested that the proponent consults with TfNSW and also requires TfNSW's approval prior to the issue of a Construction Certificate.</p> <p>Prior to the issue of any construction certificate or any preparatory, demolition or excavation works, whichever is the earlier, the applicant shall:</p>	<p>Noted. This condition is only relevant to Stage 1A.</p>	
<ul style="list-style-type: none"> ▪ Prepare a Construction Pedestrian and Traffic Management Plan (CPTMP) in consultation with TfNSW. The CPTMP needs to specify matters including, but not limited to, the following: ▪ A description of the development; ▪ Location of any proposed work zone(s); 	<p>Noted, and accepted as an appropriate condition of consent.</p>	

TfNSW Comment	Response	Supporting Documentation
<ul style="list-style-type: none"> ▪ Details of crane arrangements including location of any crane(s) and crane movement plan; ▪ Haulage routes; ▪ Proposed construction hours; ▪ Predicted number of construction vehicle movements, detail of vehicle types and demonstrate that proposed construction vehicle movements can work within the context of road changes in the surrounding area, noting that construction vehicle movements are to be minimised during peak periods; ▪ Construction vehicle access arrangements; ▪ Construction program and construction methodology, including any construction staging; ▪ A detailed plan of any proposed hoarding and/or scaffolding; ▪ Measures to avoid construction worker vehicle movements within the Telopea Precinct; ▪ Consultation strategy for liaison with surrounding stakeholders, including other developments under construction and Parramatta Light Rail Builder; ▪ Identify any potential impacts to general traffic, cyclists, pedestrians, bus services and any light rail within the vicinity of the site from construction vehicles during the construction of the proposed works. Proposed mitigation measures should be clearly identified and included in the CPTMP; and 		

TfNSW Comment	Response	Supporting Documentation
<ul style="list-style-type: none"> Identify the cumulative construction activities of the development and other projects within or around the development site, including the Parramatta Light Rail Project and private development. Proposed measures to minimise the cumulative impacts on the surrounding road network should be clearly identified and included in the CPTMP; 		
<p>Pedestrian connections between the Parramatta Light Rail stop and the Telopea Precinct redevelopment should be designed in consultation with the Parramatta Light Rail project team and Operator.</p>	Noted.	

3. SYDNEY WATER

The following table provides a response to comments raised by Sydney Water to assist in planning the servicing needs of the proposed development in correspondence dated 15 November 2021.

Table 3 Sydney Water Comments

Sydney Water Comment	Response	Supporting Documentation
Water Servicing		
<ul style="list-style-type: none"> The capacity of existing water services and detailed requirements for amplifications will need to be confirmed following further detailed planning linked to the provision of finalised ultimate and annual staging data. As per the Feasibility lodged with Sydney Water under CN 185134, amplifications and upgrades of existing water mains and/or construction of additional pipes are likely to be required. 	<p>A Section 73 Application has been lodged by JWP to resolve this comment.</p>	<p>No further information required</p>

Sydney Water Comment	Response	Supporting Documentation
<ul style="list-style-type: none"> ▪ Detailed requirements will be provided at the Section 73 phase. ▪ ▪ 		
Wastewater Servicing		
<ul style="list-style-type: none"> ▪ The capacity of existing wastewater services and detailed requirements for amplifications will need to be confirmed following further detailed planning linked to the provision of finalised ultimate and annual staging data. ▪ As per the Feasibility lodged with Sydney Water under CN 185134, the majority of the existing sewer mains within the existing development have capacity to service the proposed development. However, as identified in the EIS, amplifications are likely to be required along parts of Evans Road and Moffats Drive. ▪ Detailed requirements will be provided at the Section 73 stage. 	A Section 73 Application has been lodged by JWP to resolve this comment.	No further information required
Recycled Water Servicing		
<ul style="list-style-type: none"> ▪ Sydney Water supports recycled water and Integrated Water Management initiatives. Developments in GOP that take on board dual piping for alternative water sources offer opportunities in helping market viability for both public or private water providers and to ensure recycled water usage can be optimised across GOP. ▪ Sydney Water supports City of Parramatta Council's position on recycled water which mandates the installation of a dual 	The Proponent does not support dual piping for alternative water sources. Further discussions between the Proponent, SWC and Council on the feasibility of dual piping for development at Telopea.	No further information required

Sydney Water Comment	Response	Supporting Documentation
<p>reticulation system in new buildings to support the immediate or future connection to a recycled water in certain growth areas.</p> <ul style="list-style-type: none"> ▪ Integrated Water Management (IWM) recognises recycled water as a reliable water servicing option when integrated into water supply and stormwater design. Recycled water can be used to great effect when greening urban areas, mitigating urban heat island effect and in improving flood resilience. ▪ Sydney Water is currently investigating recycled water services from the proposed new plant at Camellia in line with Greater Sydney Commission's recommendation for the Greater Parramatta to Olympic Peninsula (GPOP) Place-based Infrastructure Compact (PIC). There is the potential for Telopea to be serviced from Camellia by 2026-2027. There are opportunities for dual reticulation to be offered to all 4700 dwellings within the Telopea precinct. 		
Growth Data		
Sydney Water also requires advice on the anticipated yearly staging of the proposed development.	This information has been provided previously to Sydney Water.	No further information required
Out of Scoping Building Plan Approval		
SW to undertake a detailed review of building plans that affect or likely to affect noted categories.	Noted	
Tree Planting		
Sydney Water requires that all proposed or removed trees and vegetation included	Noted	

Sydney Water Comment	Response	Supporting Documentation
within the proposal adhere to the specifications and requirements within Section 46 of the Sydney Water Act (1994) and Diagram 5 – Planting Trees		

4. ENVIRONMENT, ENERGY AND SCIENCE GROUP

Environment, Energy and Science Group notes in correspondence dated 23 November 2021 that the applicant has not provided a biodiversity development assessment report (BDAR) with the development application. A BDAR Waiver has been prepared by ACS Environmental and Urbis and is enclosed in **Appendix Y**.

EES has considered the potential flooding aspects and impacts associated with the proposal and has no comments to make.

5. NSW ENVIRONMENT PROTECTION AUTHORITY

As noted in correspondence dated 23 November 2021, the EPA has no comments to provide on this project and no follow-up consultation is required. It is also noted that the proposal does not appear to require an environment protection licence under the *Protection of the Environment Operations Act 1997*. It is also recommended that Parramatta Council should be consulted as the appropriate regulatory authority for the *Protection of the Environment Operations Act 1997*.

6. HERITAGE NSW – HERITAGE COUNCIL OF NSW

The following table provides a summary of recommendations outlined in correspondence from the Heritage Council of NSW dated 8 November 2021.

Table 4 Heritage NSW Comments

Heritage NSW Comment	Response	Supporting Documentation
The HIS has identified there is an anticipated historical archeological resource of significance associated with the former Adderton Estate within the concept approval area. However, the HIS has only provided a preliminary archaeological assessment, which does not comply with the issued SEARs.	A Historical Archaeological Assessment has been prepared by Urbis in accordance with Item 12 of the SEARs.	Appendix Z
HNSW advises DPIE that for the project to comply with the issues SEARS and to fully assess and understand the proposed impacts of the concept level approval, an historical archeological assessment should be prepared by a suitable qualified archeologist in accordance with the guidelines Archaeological Assessment (1196) and Assessing Significance for Historical Archaeological Sites and Relics (2209). This assessment should identify which relics, if any, are likely to be present, assess their significance and consider the impacts form the proposed on this potential archeological resource.	A Historical Archaeological Assessment has been prepared by Urbis in accordance with Item 12 of the SEARs.	Appendix Z

Heritage NSW Comment	Response	Supporting Documentation
HNSW notes that an archeological testing program may be appropriate to confirm survivability and significance of the archaeological resource and inform the assessment	This is noted in the Aboriginal Cultural Heritage Assessment prepared by Urbis as part of the original EIS Package	Appendix W of the original EIS Package
Where harm is likely to occur, it is recommend that the significance of the relics be considered in determining an appropriate mitigation strategy. If harm cannot be avoided in whole or part, an appropriate Research Design and Excavation Methodology should also be prepared to guide any proposed excavations or salvage programme.	This is noted and accepted by the Proponent as a condition of consent.	No further information required

7. HERITAGE NSW – HISTORICAL ARCHAEOLOGY AND ABORIGINAL CULTURAL HERITAGE

Correspondence was received from the Aboriginal Cultural Heritage Regulation (ACHR) team within Heritage NSW on 24 October 2021. Overall, the ACHR team supports the quality and overall intent of the Aboriginal Cultural Heritage Assessment Report (ACHAR) undertaken by Urbis and notes that the consultation process undertaken with the RAPs has been to a very high standard.

The ACHR submission notes that Heritage NSW does not require that the proponent undertake the first recommendation in the ACHAR, which identifies the potential for Archaeological Test Excavations to be undertaken in a small portion in the north-western corner of the subject area. Heritage NSW supports the remaining recommendations of the ACHAR. This recommendation was made in consultation with the registered Aboriginal Parties (RAPs) as part of the ACHAR process and regardless of the HNSW feedback, it is the Proponent's intention to undertake 2-3 days testing pre-construction to reflect the comments and requests of the RAPs. It is anticipated this will be incorporated as a condition of consent.

8. ENDEAVOUR ENERGY

Endeavor Energy's Asset Planning & Performance Branch have advised a Technical Review Request ENL3764 was completed on 14 July 2020 which based on the 'Telopea – Staging Plan' provided assessed the Precinct to take up 12.5 megavolt amperes (MVA) of load. Based on these findings, the recommendations from correspondence dated 9 November 2021 are outlined in the table below.

Table 5 Endeavour Energy Comments

Endeavour Energy Comment	Response	Supporting Documentation
Flooding and Drainage		
<p>Endeavour Energy has noted the EIS indicates there are flood risks associated with the redevelopment of the Concept Plan Area (CPA) but Stage 1A is located away from The Ponds Creek it is not subject to mainstream flooding.</p> <p>Endeavour Energy requires the electricity network needed to service an area / development to be fit for purpose and meet the technical specifications, design, construction and commissioning standards based on Endeavour Energy's risk assessment associated with the implementation and use of the network connection / infrastructure for a flood prone site. Risk control has focused typically on avoiding the threat, but where this is not possible, reducing the negative effect or probability of flood damage to assets by implementing good design and maintenance practices.</p> <p>Distribution substations should not be subject to flood inundation or stormwater runoff ie. the padmount substation cubicles are weatherproof not flood proof and the cable pits whilst designed to be self-draining should not be subject to excessive ingress of water. Section 7 'Substation and switching stations' of Endeavour Energy's Mains Construction Instruction MCI 0006 'Underground distribution construction standards manual' provides the following details of the requirements for flooding and drainage in new distribution substation locations.</p>	<p>Stage 1A is not located in the flood zone, please refer to the flooding addenda assessment in Appendix R.</p> <p>This request can be a condition of consent.</p>	<p>Appendix R</p>
Site Remediation		
<p>Endeavour Energy has noted the Preliminary Site Investigation and the Detailed Site Investigation do not appear to identify the electricity infrastructure on</p>	<p>This request can be a condition of consent.</p>	<p>No further information required</p>

Endeavour Energy Comment	Response	Supporting Documentation
<p>or in vicinity of the site which is likely to become redundant assets as a result of the proposed development as potential areas of environmental concern (AEC) and associated contaminants of potential concern (COPC).</p> <p>Endeavour Energy's Environmental Business Partner Team have advised that the remediation of soils or surfaces impacted by various forms of electricity infrastructure is not uncommon but is usually not significant eg. transformer oil associated with leaking substations, pole treatment chemicals at the base of timber poles etc. The method of remediation is generally the removal of the electricity infrastructure, removal of any stained surfaces or excavation of any contaminated soils and their disposal at a licensed land fill. The decommissioning and removal of the redundant electricity infrastructure will usually be dealt with by Endeavour Energy's Network Connections Branch as part of the application for the connection of load for the new development.</p>		

9. DPE SOCIAL IMPACT ASSESSMENT TEAM

The DPE Social Impact Assessment Team provided detailed comments on 12 November 2021 in relation to the SIA Report prepared by Urbis. A detailed response to these comments and recommendations is provided in **Table 6** below.

Table 6 Response to DPE SIA comments

DPE Recommendation	Response
<p>Undertake further engagement with relevant people and groups as per the requirements of DPIE's SIA guideline. When designing the engagement methodology, please refer to the provisions in Appendix A of the guideline, to ensure that engagement methods:</p> <ul style="list-style-type: none"> • are tailored to the needs of the people being engaged, and 	<p>Engagement activities have been undertaken over the past 5-6 years to inform various stages of the master planning process. For the Telopea Concept Plan and Stage 1A SSDA application several engagement methods were undertaken including engagement with the community and key stakeholders. Consultation with key stakeholders will continue to be undertaken throughout the lifecycle of the project.</p>

DPE Recommendation	Response
<ul style="list-style-type: none"> • draw on a variety of levels of participation, as per the IAP2 spectrum. 	<p>It is considered good practice to avoid duplicating engagement processes for the purposes of the SIA. The preferred approach is to feed key engagement outcomes from activities undertaken by engagement specialists, or technical specialists into the SIA assessment.</p> <p>Notwithstanding, targeted consultation was undertaken with City of Parramatta's Acting Manager of Social Outcomes to gain an understanding of potential social impacts from a local perspective.</p> <p>Engagement activities undertaken for the Concept Plan and Stage 1A SSDA application were unavailable at the time of preparing the SIA. Reporting on these activities is now available and is summarised below.</p> <p>Invitations for engagement were sent to 2,000 households and businesses throughout Telopea. This catchment area included social housing tenants, private dwelling owners, business owners, residents, and businesses along Kissing Point Road. At the engagement sessions, representatives from Land and Housing Corporation and the Department of Communities and Justice were on hand to provide details on the process of relocation. The key issues raised by the community and outlined in the Engagement Report are relocation of residents, retention of trees, accessibility considerations given the topography of the site, support for additional retail, capacity of the traffic network and queries around the length of the staging project timeline. All these matters are addressed in the SIA.</p> <p>Engagement with the local Aboriginal community was undertaken for the Concept and Stage 1A SSDA and will continue to be undertaken throughout the detailed design stages (as recommended in the Aboriginal Cultural Heritage Assessment (ACHA) and the Connecting with Country framework). To inform the ACHA, letters were sent to 61 local Aboriginal groups and individuals, also known as registered Aboriginal parties (RAPs). A total of 19 groups registered interest in the project. Comments were provided by the RAPs throughout multiple stages of engagement. Comments acknowledged the ACHA finding that no registered sites within the subject area are known, but recommended that some test excavations be undertaken to confirm this. This feedback was accepted, and as noted in the ACHA, a short test excavation program is recommended. Other comments from the RAPs supported the recommendations of the ACHA including the test excavation, Aboriginal cultural heritage induction material for contracts on site, implementation of procedures if archaeological deposits or human remains are</p>

DPE Recommendation	Response
	<p>found, and RAP consultation being ongoing throughout the project.</p> <p>See further below for information on the project's Connecting with Country Framework.</p>
<p>Please update the SIA with any additional impacts, enhancements, and mitigation measures. The SIA should consider the impact areas (a) to (i) listed here, at a minimum, and as informed by engagement as explained in comment 1. If any of these impacts are not predicted to be significant, please provide supporting evidence.</p>	<p>(a) Traffic impacts have been assessed in the SIA and are considered to have a low impact based on evidence in the Transport Assessment prepared by Ason Consulting. Construction impacts are addressed in 'neighbourhood change'.</p> <p>A review of the Engagement Report prepared by Elton Consulting/WSP, which was not available at the time the SIA was prepared, found no further comments were raised by the community or stakeholders in relation to traffic or construction.</p> <p>(b) The Aboriginal Cultural Heritage Assessment (ACHA) and Connecting with Country Framework were not available at time of writing the SIA. These documents have been reviewed and Urbis provides the following comments:</p> <ul style="list-style-type: none"> ▪ The ACHA found no Aboriginal objects and/or places recorded within or near the subject area. ▪ The archaeological predicative model identified low to moderate potential for the Aboriginal archaeological sites within the subject area. However, it is acknowledged that the subject site is part of the wider Teloepa/Parramatta region which is highly significant to Aboriginal people of the past and present. As noted in the above, a key recommendation in the ACHA is to undertake a short test excavation to confirm no Aboriginal archaeological sites are located on site. ▪ As stated in the ACHA, engagement with the RAPs emphasised the importance of sympathetic landscape, urban and interior design to allow for interpretation and engagement with Country by Aboriginal and non-Aboriginal people. The Connecting with Country Framework prepared by the Fulcrum Agency provides a range of recommendations around landscape, urban and interior design to allow for interpretation. ▪ From an SIA perspective, with the implementation of ACHA and Connecting with Country recommendations, the incorporation and representation of Aboriginal cultural heritage and

DPE Recommendation	Response
	<p>history is likely to have a positive impact on local Aboriginal peoples and the wider non-Aboriginal community. This is based on increased opportunities to engage with and experience the local Aboriginal culture, heritage and history.</p> <p>(c) The change resulting from impacts on sense of place, community character and community cohesion are addressed in the following three significant impacts: 'community integration, belonging and connection, 'neighbourhood change' and 'relocation of tenants'.</p> <p>(d) Service accessibility because of an increased population has been considered in the following two impacts: 'improved community facilities and access to high quality open space' and 'access to new supermarket, food and beverage, and specialist retail providers'. As outlined in the Engagement Report, the community were supportive of additional retail services in the area, particularly the need for better supermarkets and amenities to cater for the growing population. No comments were raised about the affordability of such services. The library and community centre will remain managed by City of Parramatta and therefore remain free or low cost. It is difficult to comment on the affordability of food services as major retailers have not been confirmed at this early stage and in any case the applicant would not have influence over food prices. To support tenants on low incomes who may have difficulties accessing affordable food, Hume Housing partners with low cost supermarkets across Sydney, such as The Staples Bag, and with food parcel services. These services will be available Telopea residents.</p> <p>(e) The long-term staging approach will somewhat alleviate impacts related to access as is addressed in 'neighbourhood change'. The loss of homes and livelihoods is acknowledged and addressed in the impact 'relocation of existing residents'. As noted in the SIA, where possible all significant trees will be retained to maintain the bushland character of the area. The Telopea Community Garden will also be retained. The landscape plan responds to and works with the existing environmental aesthetic of the area. Loss of environmental aesthetics is not considered likely to be a significant impact.</p> <p>(f) The SIA includes an impact related to 'crime and safety', which relates to all demographics. To inform this impact, evidence from previous stakeholder engagement and key BOCSAR data was used. There was no evidence specifically relating to women and migrants from these data sources, therefore making it difficult to directly comment on these two</p>

DPE Recommendation	Response
	<p>demographic characteristics. Doing so also leaves a gap in the many other groups which can experience specific safety impacts, such as First Nations peoples, older people, young people and people who identify as LGBTIQ+.</p> <p>(g) For redevelopment of an urban estate with new residential units and a retail precinct, the DPE SIA Guidelines Technical Supplement suggests the two considerations below for decision-making systems. Comments are provided for both considerations.</p> <ol style="list-style-type: none"> <li data-bbox="722 640 1382 707">1. Are there adequate and responsible grievance and remedy mechanism in the events of complaints? <p data-bbox="775 734 1425 913">The Department of Communities and Justice is preparing a management plan which will include legal obligations on procedures to dealing with complaints. Due to sensitivities, this cannot be shared in the public domain.</p> <ol style="list-style-type: none"> <li data-bbox="722 943 1425 1048">2. Can affected people make informed decisions or feel they can influence project decision, including elements of project design? <p data-bbox="775 1077 1425 1406">As noted above, engagement with community and stakeholders has occurred over the past five years to inform master planning process. Frasers and LAHC have taken on this feedback during this time to help inform design decisions. As outlined in the Connecting with Country framework, local Aboriginal communities and stakeholders will have direct input into many of the detailed design elements such as public art, wayfinding and landscape.</p> <p>(h) Impacts to way of life for tenants of public housing, including recognition of their fear and anxiety, is addressed in the impact 'relocation of existing tenants'. The implementation of a Tenant Relocation Strategy, with clear communication around temporary relocation will be crucial in minimising potential fear of the unknown that tenants of social housing are likely to experience.</p> <p>(i) There is no evidence from the Engagement Report prepared by Elton Consulting/WSP that residents and future owners and tenants are concerned about the potential for building defects in their future homes at Telopea.</p> <p>Frasers Property is one of Australia's largest and most reputable and awarded residential development companies. It has the highest standards of planning and building, with industry-leading project management systems. The NSW</p>

DPE Recommendation	Response
	<p>Building Commissioner, councils and communities have never expressed concerns or challenges with the quality of projects built by Frasers and its contractors.</p>
<p>Please analyse the cultural significance of the site and locality for Aboriginal people and for the public housing tenants. This analysis should contribute to an assessment of how the proposed project may be experienced by the community. As an enhancement and/or mitigation measure, please consider how place-making activities and/or public art can address cultural values.</p>	<p>See comments above regarding the cultural significance of the site and locality for Aboriginal people.</p> <p>In regards to enhancement and mitigation measures around place making activities and public art, the Connecting with Country Framework provides a range of recommendations that address these matters. Some of the recommendations include:</p> <ul style="list-style-type: none"> ▪ Consult with Traditional Custodians to establish clear aims, performance criteria and metrics for the health and wellbeing of Country. ▪ Talk with Aboriginal knowledge-holders to understand historical narratives of site to overlay on the landscape plan including species selection, hardscape materials, wayfinding and public art. ▪ Commission Aboriginal artists for public art. ▪ Engage local Aboriginal cultural experts in determining use of language and naming in signage and interpretive material. ▪ Mandate Aboriginal participation in brief development for the Community Centre and its facilitation of cultural safety and practice. ▪ Engage Aboriginal community groups for the cultivation and maintenance of community gardens. ▪ Engage with Traditional Custodians to understand how contemporary and traditional culture can be expressed in the public spaces such as fire pits, Yarning Circles and/or smoking ceremony facilities. ▪ Explore opportunities for a dance circle or small auditorium stage near the Plaza Square to use for cultural events. <p>These recommendations, and others provided in the Connecting with Country Framework, are supported from an SIA perspective as they will positively contribute to the community experience of the site.</p>
<p>Please incorporate universal design principles into the development and design, in accordance with the Liveable</p>	<p>LAHC has existing standards which mandate that all social housing it delivers will meet the Silver Level of the Liveable Housing Australia (LHA) standards, with 5-10% being Gold</p>

DPE Recommendation	Response
<p>Housing Australia Gold Standard. (https://livablehousingaustralia.org.au)</p>	<p>Level. This is a typical provision rate for social and affordable housing in NSW, and significantly higher than most market housing.</p> <p>The housing to be delivered in Telopea will meet these LAHC-required standards for housing accessibility.</p>
<p>Please identify further opportunities to deliver social benefits to the broader community through the development, informed by community and stakeholder engagement.</p>	<p>The SIA identifies the social benefits that will be delivered to the broader community, such as the new library and community centre, high quality open space, and greater access to food and retail. The Engagement Report prepared by Elton Consulting/WSP was reviewed, and no further social benefits than those already addressed in the SIA were identified or requested by the community or stakeholders.</p>
<p>Please assess the cumulative ways in which people are likely to experience social impacts, and propose responses that address impacts at the cumulative level (e.g. coordinating responses and adaptive management.)</p>	<p>Cumulative impacts are currently addressed in some of the impacts in the SIA. A three-stage plan has been prepared to deliver housing. Importantly, the key social infrastructure, transport and open space will be delivered in the earlier stages. As noted in the impact 'neighbourhood change' staging renewal can have positive implications for the community, as parts of the Concept Plan area will remain accessible, while construction occurs in other locations. It was also acknowledged that the long project timeline could also result in feelings of construction fatigue over a cumulative period.</p> <p>Critical to managing cumulative impacts will be the implementation of the Tenant Relocation Strategy and Social Housing Management Plan which will outline key procedures around managing potential issues as they arise in the community.</p>
<p>Please review and update the SIA with management measures that are tangible, durably effective, deliverable by the proponent, and directly related to the impacts identified. The Technical Supplement (Section 3) provides guidance on responding to impacts, and DPIE would expect to see these provisions carefully considered.</p>	<p>All management measures included in the SIA are being delivered by the proponent and therefore are tangible, will be effective and deliverable.</p>
<p>Section 9.1 (p.47) of the SIA provides a suite of recommendations. These should be expanded and enhanced to form a preliminary SIMP. Within the preliminary SIMP, please provide the following at a minimum:</p>	<p>A preliminary Social Impact Management Plan (SIMP) was not required as part of the SEARS. As noted in Section 4.10 of the SIA Guidelines, 'The SIA Report for an EIS should provide a basis for developing a social impact management plan, where required. In some cases, the project specific SEARs may require a preliminary social impact monitoring and management plan to be included in the SIA report'. As</p>

DPE Recommendation	Response
<ul style="list-style-type: none"> ▪ summary table of impacts, mitigations, commitments and desired outcomes in social terms, including targets where appropriate; ▪ adaptive measures if the target is not met; ▪ what will be monitored; ▪ how and when data will be collected; ▪ who is primarily responsible for monitoring; ▪ how incidents and grievances will be recorded, reported, and responded to; ▪ how community and other stakeholders can participate in monitoring if they wish; and ▪ public reporting arrangements. 	<p>stated in Section 5.1 where a full SIMP is required, this will be requested via conditions of consent.</p> <p>It is also noted that the Hume Housing is preparing a detailed plan for its management of social and affordable housing, known as a Social Housing Outcomes Plan (SHOP). The preparation and delivery of the SHOP is required under contractual relationships between Hume Housing and the Department of Communities and Justice.</p> <p>The SHOP will set out key social outcomes and obligations, in a similar way to a SIMP. Due to the sensitivities of this document, it cannot be shared.</p>
<p>Future stage proposals should aim to achieve the goal of at least 30% social and affordable housing, as per the NSW Future Directions for Social Housing policy.</p>	<p>Urbis has previously undertaken extensive research and case study analysis of the 70:30 ratio in the Future Directions Policy. According to this literature review and case studies, there is no evidence base for a particular ratio of private market to social and/or affordable housing in mixed tenure developments in Australia or internationally.</p> <p>The ratio is used as a shorthand way of indicating that areas should include no more than 30% of housing being social housing. The intention behind this policy is to avoid the social housing estates developed in cities in Australia and elsewhere in the 1950s to 1980s. These estates had high proportions of social housing, which concentrated social disadvantage and resulted in a wide range of socioeconomic challenges and associated stigma. The aim of the 70:30 ratio, and a key aim of the associated urban renewal in Telopea and elsewhere, is therefore to reduce the spatial concentration of social disadvantage in specific parts of Sydney.</p> <p>The 70:30 ratio was also identified in Future Directions as a target rather than a development standard.</p>