

Appendix A Submission Response Table

Table 1 The Department of Planning Comments

Comment	Applicant Response
Consistency with the Planning Proposal	
<p>1. The recent exhibition of Planning Proposal (PP-2023-2810) included a draft site-specific Development Control Plan (DCP). The proposal must be co-ordinated with the PP, and either the proposal or the draft DCP controls must be revised to ensure they are aligned in terms of:</p> <ul style="list-style-type: none"> a. Maximum floor plate length (C.03) b. Upper level tower setback (C.13) c. Car parking (C.05a and C.05b) d. Future through site link through the public open space (C-02). 	<p>Refer to Section 4.1.1 of the RtS Report.</p>
<p>2. Provide an updated assessment against the final draft DCP controls, demonstrating consistency with the objectives and controls.</p>	<p>Refer to Section 4.1.1 of the RtS Report.</p>
Public Park	
<p>3. Council raised concerns regarding the siting, design, and orientation of the proposed public park and has indicated that it will not support its dedication. You are requested to respond to these concerns.</p> <p>It is noted that the EIS indicates that, should Council not accept dedication, the park would instead be subject to public easements and maintained by the Strata Plan. Further detail is requested regarding this arrangement including the mechanisms to ensure the park will be publicly accessible and maintained for the life of the development.</p>	<p>The siting and design of the proposed public park have been guided by the Department’s Design Principles, which in turn informed the site-specific Development Control Plan. This is discussed further in Section 4.1.2 of this RtS Report. The park is intended to provide a high-quality open space that responds to local character, strengthens pedestrian connections, and offers a new recreation opportunity for the local community.</p> <p>As outlined in the EIS, the park will be delivered at the proponent’s cost and has the potential to be dedicated to Council upon completion of the development. However, on the basis that Council does not wish to accept dedication, an alternative management framework is proposed to ensure that the space continues to function as publicly accessible open space for the life of the development. Under this arrangement:</p> <ul style="list-style-type: none"> • Public access will be secured via registered public access easements in perpetuity. These easements will provide legally binding rights of access for the community, ensuring the park cannot be restricted to private use.

Comment	Applicant Response
	<ul style="list-style-type: none"> • Maintenance and management will be the responsibility of the Owners Corporation (Strata Plan), with obligations established under the Strata Management Statement and ongoing strata levies. This will ensure the park is appropriately maintained in accordance with agreed standards, consistent with other public domain works in the precinct. • Pedestrian connectivity will be reinforced through the new east-west connection provided within the site, ensuring convenient public access without reliance on the adjacent private road network. <p>This dual pathway approach provides certainty that, regardless of whether Council accepts dedication, the public park will be delivered, maintained, and accessible for the long term. The arrangement offers flexibility while safeguarding the intended community benefit.</p>
<p>4. Provide the following further detail:</p> <p>a. an updated CPTED Report detailing the public park and associated pedestrian links and addresses the concerns raised by Council and in public submissions</p>	<p>An updated CPTED Report has been prepared by Group GSA and is provided at Appendix D.</p>
<p>b. a Public Space Plan which addresses the requirements of the SEARs and the draft DCP</p>	<p>Group GSA has responded to the SEARs requirement for a public space plan within pages 92-94 of the Urban Design Report at Appendix C.</p> <p>The Public Space Plan explicitly addresses the SEARs as follows:</p> <p>The public space plan identifies that a 1,000m² publicly accessible park is proposed at the southeastern edge of the site. The design of the public park has been informed by the site-specific DCP which supported PP-2023-2810. A detailed assessment against the DCP provisions is provided in Section 4.1.1 of the RtS Report.</p> <p>The public park compliments the adjoining residential communal open space and will provide passive and active uses to support the local community. Access to public park is proposed primarily from a norther pedestrian link to minimise access from the private to the south of the site. The park comprises both passive and active recreation areas to support the community and interfaces appropriately with the private communal open spaces.</p> <p>As confirmed within the Landscape Design Report at Appendix F, accessible paths of travel are available across the site. Additionally, the public park has been designed to enable</p>

Comment	Applicant Response
	<p>access from multiple points, ensuring ease of accessibility and connectivity to the surrounding area. As a pocket park, it is not expected to attract significant visitation but rather will provide additional open space to support the local community.</p> <p>The broader development site positively interfaces with Bridge Road, with ground floor street access provided to the apartments fronting Bridge Road and private open spaces and living areas looking out to Bridge Road to improve passive surveillance and activation. Passive surveillance of the private access road is also promoted through the location of private open spaces and living areas fronting the street, however as this is a privately owned street alternate access arrangements have been provided to minimise use of the street by members of the public.</p> <p>The public park can be accessed from the public through-site link along the northern boundary of the site which connects the park to Bridge Road. The public open space can also be accessed via the private access road and adjoining footpath within the Monarco residential complex to the south. Providing two access points to the public open space reduces potential conflicts with vehicles turning into the driveway at the northwestern edge of the site. The footpath to the north and the private access road to the south provide shared access for cyclists.</p> <p>A high quality public domain is proposed in line with the city of Parramatta Public Domain Guidelines. Shaded seating and gathering spaces are evenly distributed along the southern and western edge of the park engaging with the adjacent communal open spaces areas to provide activation, enhance sense of community and improve CPTED. They provide secluded areas for rest and relaxation as well as a number of seating zones overlooking the open lawn area which is large enough to accommodate a range of passive and active uses including kids play and kickabout.</p>
<p>c. confirm that the public open space is consistent with the solar access and shading requirements under the draft DCP.</p>	<p>Refer to Section 4.3.2 of the RtS.</p>
<p>d. provide an accessibility report, prepared by a suitably qualified person, that confirms the public park is universally accessible.</p>	<p>The Amended Landscape Plans, prepared by Distinctive and attached as Appendix E, confirm that the public park has been designed so that it is universally accessible.</p>

Comment	Applicant Response
	<p>The northern through-site link is noted as an accessible pathway which extends through the public park and communal open space ensuring universal access to the public park from Bridge Road and the residential buildings.</p>
<p>Building height</p>	
<p>5. Provide further detail to confirm the building height: a. an overlay of the roof plan over the survey plan, with existing ground level and the uppermost points of the roof clearly notated</p>	<p>Refer to drawing number SSDA-9198A within the Architectural package for roof overlay plan.</p>
<p>b. updated section plans dimensioning the uppermost point of the building with the existing ground level directly underneath.</p>	<p>Refer to drawing number SSDA-9198B within the Architectural package for building height section plans.</p>
<p>Gross floor area / floor space ratio</p>	
<p>6. Provide further detail to confirm that the gross floor area (GFA) calculations are consistent with the definition of GFA in the Parramatta Local Environmental Plan 2023 (PLEP) and that the proposed floor space ratio (FSR) complies with the State Environmental Planning Policy (Housing) 2021 (Housing SEPP) by confirming whether garbage areas on the lower ground floor areas defined as 'basement' per the PLEP and are correctly excluded from the FSR calculations, or ensure that they are counted as GFA and update the GFA plans accordingly.</p>	<p>The garbage room was incorrectly excluded from GFA. In response to this, the garbage room on the lower ground floor has now been included within the GFA. This GFA increase has been offset with the opening of certain residential corridors, which enables these spaces to be excluded from GFA. Whilst these corridors were primarily opened to improve natural cross ventilation, they also allow the development as amended to have a compliant GFA and FSR. A total GFA of 40,543m² is proposed, which is a decrease of 1m² compared to what was originally submitted.</p> <p>The open end of the access corridor is designed to be unenclosed and naturally ventilated. The perimeter treatment comprises a balustrade (1.2–1.3 m high) with no glazing or enclosure above. Accordingly, the area is effectively a terrace/balcony-type space with an outer wall less than 1.4 m and is excluded from gross floor area pursuant to the GFA definition (exclusion (i) of the Parramatta LEP 2023).</p>
<p>Affordable housing</p>	
<p>7. The PP includes an additional local provision requiring that 12 dwellings, or 3% of the GFA, be provided as affordable housing for a period of 15 years. It is unclear whether this has been provided. This local requirement is separate from, and does not contribute to, the minimum affordable housing obligations under the Housing SEPP's in-fill affordable housing provisions (Housing SEPP Affordable Housing). Affordable housing requirements under a LEP (LEP Affordable Housing) must be met in addition to the Housing SEPP Affordable Housing.</p>	<p>Refer to Section 4.1.3 of the RtS.</p>

Comment	Applicant Response
<p>8. Provide an updated letter from the Applicant’s nominated community housing provider (CHP) confirming that:</p> <ul style="list-style-type: none"> a. the Housing SEPP Affordable Housing and the LEP Affordable Housing will be managed as affordable housing for at least 15 years b. the proposed allocation of affordable apartments is acceptable. 	<p>A letter from the nominated CHP has been provided at Appendix W.</p>
<p>9. The Department raises concern that the affordable apartments achieve a lower level of amenity than market apartments, particularly in relation to solar access and cross ventilation. Demonstrate that the affordable housing apartments will have good level of amenity in terms of key ADG criteria and the “Residential amenity of affordable housing” section (p15) of the In-fill Affordable Housing Practice Note.</p>	<p>Group GSA has prepared additional ADG compliance tables which outline the metrics of each apartment in the proposed development. These tables outline that each apartment (including the affordable apartment) achieves an appropriate level of amenity. Refer to Appendix C. Solar access and cross ventilation diagrams are providing at pages SSDA-9150 and SSDA-9170-9172 of the architectural pack which confirm the following in regards to amenity.</p> <p>62/92 of the affordable dwellings achieve cross ventilation representing 67% and achieving compliance.</p> <p>Of the 92 affordable housing dwellings, 57 (62%) achieve more than two hours of solar access. This is below the Apartment Design Guide (ADG) target of 70%. A further 25 dwellings (27%) achieve less than two hours of solar access, while 10 dwellings (11%) do not receive any direct solar access, which is below the maximum 15% requirement for no solar access.</p> <p>The reduced solar access outcomes for a portion of apartments are largely attributable to the proposed unit mix and building configuration. In particular, smaller dwellings are generally located closer to the centre of the building footprints, where access to direct sunlight is more constrained, and solar access is also reduced for south-facing apartments. Further, as the affordable housing dwellings are primarily located on the lower levels of Building A, they are inherently more susceptible to reduced solar access due to constrained sky exposure and increased overshadowing from surrounding built form, including Building B. In this context, the solar access results reflect the physical constraints of the siting, massing and unit distribution, rather than poor design intent.</p>
<p>Overshadowing</p> <p>10. Provide further analysis of overshadowing impacts to neighbouring residential properties including:</p>	<p>Group GSA has undertaken further analysis of overshadowing at pages 42 to 60 of the Architectural Plans attached at Appendix C. For further detail, refer to Section 4.3.2 of the RTS.</p>

Comment	Applicant Response
<p>a. a detailed written analysis, to supplement the solar access analysis in the Design Report, which:</p> <ul style="list-style-type: none"> i. confirms neighbouring residences (particularly within the Monarco Estate) will retain two hours solar access to the private open space areas and north facing living areas on June 21, including calculations of the amount of sunlight lost and retained and confirmation that the requirements of the draft DCP are met ii. addresses the specific overshadowing concerns raised in submissions <p>b. shadow diagrams in elevation or sun eye diagrams depicting the impact on the proposed development on the Monarco Estate</p> <p>c. plan and elevation shadow diagrams at 30-minute intervals on June 21</p> <p>d. updated sun eye diagrams, drawn at 30 minutes to a page for legibility, and clearly depicting the private open space areas/living areas that receive sunlight in colour.</p>	
<p>Residential amenity</p>	
<p>11. Provide a revised assessment table which demonstrates how each dwelling (including affordable dwellings) performs against the Apartment Design Guide (ADG) design criteria for the following:</p> <ul style="list-style-type: none"> a. private open space/balcony areas and depths b. habitable room and living room area depths and widths c. depths of any cross-over or cross-through apartments measured glass line to glass line d. bedroom dimensions and areas. <p>It is noted that several units exceed the maximum allowable depths (for example, A1.07) or do not meet the minimum width (for example, AUG.01) and the proposal should be amended to be consistent with the ADG.</p> <p>Additionally, confirm that study rooms without windows throughout the development are no greater than 6m² so that they are not 'habitable rooms'.</p>	<p>Group GSA has prepared revised ADG assessment tables on pages 78 and 79 of the Architectural Plans which are attached within Appendix C and confirm that each dwelling achieves the design criteria of the ADG.</p>
<p>12. Communal open space (COS)</p> <ul style="list-style-type: none"> a. The COS calculations must be amended to exclude landscaped street setbacks located along Bridge Road. Confirm that 30% of the site area is provided as COS excluding these areas. b. Detailed calculations are to be provided confirming that the COS achieves a minimum 50% direct sunlight on June 21 and 20% of the COS is protected from direct sunlight between 9am and 3pm on December 21 per the Draft DCP. 	<p>The COS within the street setbacks located along Bridge Road have been removed. The total proposed COS equates to 2,625m² which is 30.3% of the site area.</p> <p>The COS has been oriented largely in a north south direction with a significant portion of the COS located to the east of the development which facilitates a high degree of solar access. Refer to drawing number SSDA-9132 for further detail.</p>

Comment	Applicant Response
<p>13. Visual privacy</p> <p>Several windows (such as those between Units A7.01 and A7.11) have direct sightlines that may impact privacy. Please revise the proposal to address and mitigate this issue.</p> <p>Additionally, the communal outdoor decks throughout the development raise potential privacy concerns and should be reconsidered as part of the design review.</p> <p>The ground floor apartments have windows and openings directly located next to the COS areas, which results in privacy impacts. This arrangement should be further reviewed to address and mitigate potential impacts.</p>	<p>The architectural plans have been amended to include annotations confirming that visual privacy will be maintained through the use of high level windows with privacy screens as well as low level screening plants.</p>
<p>14. Natural ventilation</p> <ul style="list-style-type: none"> Several apartments that are marked as naturally ventilated (such as Units A7.01, A7.06, A7.09, A7.10, A7.11, and B7.08) do not appear to receive adequate natural ventilation. These units rely on windows that face articulation zones or similar areas, which may limit airflow. <p>Please provide wind testing to verify that all apartments identified as naturally ventilated meet the ADG requirements.</p>	<p>In response to this concern raised by the Department, the design team are proposing to open the residential corridors of the affected units. As outlined in Section 4.3.2 of the RtS and in the supporting letter from RWDI attached in Appendix J, this design change will ensure that the affected units can be naturally cross ventilated.</p> <p>The design changes have been made on the architectural plans, refer to drawing SSDA-9150.</p>
<p>15. Private open space</p> <p>Apartments at ground level or on a podium shall have private open space areas with a minimum area of 15m² and depth of 3m. The proposal should be amended to achieve consistency with this requirement.</p>	<p>The ground floor private open spaces have been amended to comply with the minimum area and depth requirements under the ADG. As outlined in the ADG compliance assessment, each apartment achieves private open spaces in accordance with the ADG.</p>
<p>16. Common circulation and spaces</p> <p>Building A has 307 apartments and 4 lifts, resulting in approximately 77 apartments sharing a lift. Building B has 242 apartments and 3 lifts, resulting in approximately 81 apartments sharing a lift. You are requested to provide a Vertical Transport Traffic Study confirming that this arrangement is acceptable.</p>	<p>A Vertical Transportation Traffic Study has been prepared by Collective Engineering and is attached as Appendix R.</p> <p>The study included a lift traffic analysis which confirms that Tower A will be supported by four lifts. The Average-Wait-Time (AWT) for the lifts will be 30 seconds. Tower B will be supported by three lifts with an AWT of 46 seconds. The AWT criteria is less than 60 seconds therefore, both lifts provide a quality of service that satisfies the design criteria.</p>
<p>17. Storage</p> <p>Provide an updated storage schedule which contains an overlay of the storage areas in the basement and confirms the allocation of cages to each apartment. It is noted that there do not appear to be enough storage cages provided within the basement for each apartment.</p>	<p>Storage diagrams have been prepared by Group GSA and have been included within the revised architectural package. Refer to Appendix B.</p>

Comment	Applicant Response
<p>18. Apartment mix Council has raised concerns regarding the proposed apartment mix, which includes a high proportion of one- and two-bedroom units, with relatively few three-bedroom apartments. Please reconsider the apartment mix or provide suitable justification in support of the mix as proposed.</p>	<p>A Unit mix analysis was undertaken by Sarah George Consulting at Appendix U and supported by a Market Analysis. The analysis demonstrates that the proposed dwelling mix is supported as it will cater to needs of local workers, supports housing affordability and will contribute to the growth of the Westmead Health and Education Precinct.</p>
<p>19. Ground floor apartments Direct street access should be provided to all ground floor apartments.</p>	<p>The project team confirms the design has been amended so that ground floor apartments fronting Bridge Road are provided with direct street access, improving activation and surveillance to Bridge Road and strengthening the public domain interface (refer to Appendix C). While Bridge Road street access has been accommodated, we do not support a requirement to provide individual ground floor “street access” to the private road along the southern boundary (which services the adjoining Monarco Estate), for the following reasons:</p> <ul style="list-style-type: none"> a) The southern road is privately owned and not intended to function as a public street. The internal access road is understood to be privately owned and managed as part of that residential community. The project’s access strategy has consistently sought to avoid reliance on this private road. b) Longstanding stakeholder feedback has been that Monarco’s private road should not be used by new residents. During consultation, the Monarco Estate Owners Corporation explicitly raised that there should be no car or pedestrian access from the private road to the new development. The proposal has responded by deliberately limiting interaction with that private road and directing access elsewhere. c) The approved access strategy deliberately diverts movement away from the private road. Primary vehicle access is provided via a new access arrangement on the northern side of the site connecting to Bridge Road, rather than using the southern private road. This approach was selected in response to stakeholder concerns and to remove dependence on a privately owned road. Similarly, pedestrian connectivity is delivered via legible internal links and boundary pathways that connect to Bridge Road and the public park, so that access to key destinations is available without relying on the Monarco private road. d) Providing ground floor access to the private street would reduce the ability for the development to provide compliant landscaped areas, deep soil and canopy coverage across the site. e) Passive surveillance and activation of the private road is maintained through the provision of private open spaces and indoor communal open space along this frontage as well as the location of the central communal open space between the two buildings.

Comment	Applicant Response
	<p>The request has been met in relation to Bridge Road, with direct street access now provided to ground floor apartments fronting Bridge Road. Requiring additional “street access” from all ground floor apartments to the southern private road is onerous and unnecessary and would be inconsistent with the project’s established access strategy and stakeholder consultation outcomes.</p> <p>We therefore request that the Department confirm the amended Bridge Road street access satisfies the intent of the request, and that no further requirement is imposed to provide ground floor street access to the southern private road.</p>
<p>20. Revise the traffic impact assessment (TIA) to:</p> <ul style="list-style-type: none"> • address Council's comments • confirm that bus stops within the vicinity of the site are adequately serviced and that the development is within an accessible area per the Housing SEPP. 	<p>An updated Traffic Impact Assessment has been prepared by Ason Group (Appendix H). Refer to Section 4.3.3 of the RTS.</p>
<p>21. Update the architectural plans to detail the number and location of parking spaces allocated to market housing and affordable housing.</p>	<p>Amended Architectural Drawings have been prepared by Group GSA (Appendix B) to reflect the number, location and allocation of parking spaces between the affordable and market housing dwellings.</p>
<p>22. Confirm that stacked parking within the basement will be allocated to the same apartments.</p>	<p>Ason Group has confirmed that stacked parking within the basement will be allocated to the same apartment. Refer to the updated Traffic Impact Assessment (Appendix H).</p>
<p>23. Confirm the location of bike racks/storage required by the Draft DCP. If bike storage is proposed in the storage cages, confirm that the development is consistent with the ADG storage minimums and the bicycle parking requirements in the draft DCP.</p>	<p>Updated storage diagrams have been provided within the Urban Design Report at Appendix C.</p>
<p>24. Please note that further traffic and parking matters relating to the SSD may be raised by Transport for NSW through the PP – this advice will be forwarded to you under separate cover</p>	<p>Ason Group are the traffic consultants engaged on both the concurrent Planning Proposal and SSDA.</p> <p>Ason Group responses to the traffic and parking matters raised by agencies and the community during the exhibition of the SSDA and PP are provided in Appendix H of the RtS. Included in Appendix H are Ason’s responses to matters raised by TfNSW.</p>
<p>Contamination</p>	
<p>25. The Preliminary Site Investigation (PSI) notes that there is a high likelihood of contamination to be present on-site due to the presence of uncontrolled fill and that further investigation is necessary to investigate the impacted soil post-demolition.</p>	<p>A DSI has been prepared by Environmental Group Australia and is attached at Appendix K. For further details, refer to Section 4.3.4 of the RtS.</p>

Comment	Applicant Response
<p>Considering the contamination risk, provide a Detailed Site Investigation (DSI) in accordance with clause 4.6(3) of State Environmental Planning Policy (Resilience and Hazards) 2021, and confirm whether a Remedial Action Plan (RAP) is required.</p>	
<p>26. In accordance with the recommendations of the PSI, prepare a Hazardous Building Material Survey for further assessment.</p>	<p>The findings of the DSI determined that a Hazardous Building Materials Survey will be required prior to the demolition of structures. It is anticipated the requirement for this additional study to be included as a condition of consent as requirement to be undertaken prior to CC1.</p>
<p>Wind</p>	
<p>Due to the height of the buildings, an updated wind report should be prepared that includes detailed wind tunnel testing, including site-specific consideration of wind comfort and wind safety. Updated architectural / landscape plans incorporating any wind mitigation measures should be provided with the submissions report.</p>	<p>An updated Wind Assessment has been prepared by RWDI and is attached at Appendix I. For further detail, refer to Section 4.3.2 of the RtS.</p>
<p>Additional Information</p>	
<p>An Aviation Report that details the proposal's potential impacts on helicopter landing sites within the Westmead Hospital precinct or within the vicinity of the site is to be prepared.</p>	<p>An Aviation Impact Assessment has been prepared by Aviation Projects and is attached Appendix T.</p>
<p>Revise the geotechnical report to address the following:</p> <ul style="list-style-type: none"> i. clarify the maximum potential groundwater inflow volumes as requested by NSW DCCEE Water Group ii. provide mitigation measures/recommendations in respect to dilapidation surveys, excavation methodology and monitoring, groundwater considerations, excavation retention and foundations <p>address Council's comments</p>	<p>A Detailed Geotechnical Report and Hydrogeological Report has been prepared by El Australia and attached at Appendix L and Appendix M, respectively. Refer to Section 4.3.4 of the RtS for further details.</p>
<p>Revise the noise and vibration impact assessment to address the following:</p> <ul style="list-style-type: none"> i. clarify whether windows and openings impacted by traffic noise can be opened with noise criteria maintained, and if not, clarify how natural ventilation will be achieved for these units if windows must remain closed ii. provide an analysis of the operational noise impacts of the COS and public park onto the surrounding developments and adjoining apartments within the development, and any mitigation measures if required 	<p>Refer to Appendix X and Section 4.3.5 of the RtS.</p>

Comment	Applicant Response
Provide further detail regarding proposed ground levels around the site and any proposed cut and fill/retaining walls required	Updated Civil Plans have been provided at Appendix O .
Provide details and elevations of any fencing, including the acoustic barrier details along the northern elevation	Refer to updated Architectural and Landscape plans.
Clarify the use of plant on the rooftops of both buildings	The proposed plant will be subject to further detailed design. Additional information can be provided at the relevant construction stage.
Provide further confirmation regarding the extinguishment of easements within the Monarco Estate in response to public submissions and whether the existing easements on-site will be extinguished or retained.	<p>The easement for recreation purposes which enables the existing residents of 93 Bridge Road to use the communal facilities provided at the Monarco Estate is proposed to be extinguished as outlined in the EIS.</p> <p>All other easements, including the Right of Way easement affecting the private road, are proposed to be retained.</p>
The Services Infrastructure Report (Appendix KK) relates to the Planning Proposal and is dated 29 February 2024 and incorrectly describes the proposal. This report should be updated to reference the Development Application scheme	A revised Services Infrastructure Report has been prepared and is attached as Appendix V .
Investigate internalising the proposed substation into the building	A new substation is proposed along the private access road, in front of Tower A. This location has been chosen as the most suitable area.
The Design Verification Statement should be updated to address the Housing SEPP and remove any reference to SEPP No. 65	The Design Verification Statement has been updated. Refer to Appendix S .
Depict the location of the southern OSD tank on the architectural and landscape plans	The southern OSD tank has been added to the plans, refer to Appendix B, Appendix E and Appendix N .
The Applicant is identified as The Trustee for The Bridge Road Trust on the NSW Planning Portal. However, there are references throughout the EIS to other Applicant names, including 93 Bridge Road Pty Ltd atf Bridge Road Unit Trust and 93 Bridge Road Ltd (C/- Town Square Consultants Pty Ltd). You are requested to confirm the Applicant name and clarify the relationship between references to other companies	The applicant is confirmed as 93 Bridge Road Pty Ltd atf The Bridge Road Trust.
The submitted survey plan is dated 2019. Provide confirmation from the surveyor that the submitted survey remains valid	A visual site verification was undertaken in 2025 to confirm the provided survey plan remained accurate. Refer to Appendix G .

Comment	Applicant Response
as part of feedback to be responded to in the RtS, address submissions under the PP which reference SSD-related matters.	Noted.

Table 2 Parramatta Council Comments

Comment	Applicant Response
Public Park	
<p>Council's Community Infrastructure Strategy (CIS) prescribes the provision of high-quality public open space/children's play within 250m of high-density dwellings. There is a current gap in provision, as required to service the future population within the development. The nearest public open space is located approximately 400m away at Shannons Paddock. The subject site therefore provides an opportunity to secure additional high-quality public open space to address current provision gaps.</p> <p>To satisfactorily address the additional recreational demand facilitated by the future population, new open space will need to be high quality and maximise accessibility and permeability to the surrounding community in the context of current provision gaps, particularly children's play.</p> <p>Any 'public' open space to be dedicated to Council is required to demonstrate consistency with the fit-for-purpose criteria within Councils CIS to maximise recreational capacity and accessibility by both immediate residents and the surrounding community (see below).</p>	<p>Noted. The proposed public park will deliver a high quality 1,000m² public open space at the eastern extent of the site. As identified by Council, the nearest public open space is approximately 400m away, demonstrating the need for additional public parks in the neighbourhood.</p> <p>The proposed public park has been designed to a high quality and will meet the accessibility standards, as confirmed on the landscape drawings 03-24.03 (LEVELS & ACCESSIBILITY) plan of the landscape drawings that demonstrates compliance to AS1428.1</p> <p>The park will provide a new open space for the local community. The park we be constructed at the developers cost and will be maintained under the strata plan. As the park will be privately owned, and not managed by Council, the proposal is not required to meet Council's criteria. Nevertheless, the park has been designed to a high standard and will include a diverse range of passive recreation spaces which will attract usage by members of the community.</p>
<p>The proposed 'public' open space fails to meet the criteria and SEARs requirements. It lacks public edges (private road frontage only) and has a poorly defined interface with adjoining built form, resulting in a 'private' feel with limited accessibility/permeability to the wider community.</p> <p>The park lacks appropriate children's play facilities and gym equipment. There are also safety concerns due to possible entrapment points, fencing of access by private road owners, and inadequate emergency access.</p>	<p>Refer to Section 4.2.2 of the RtS for a detailed response.</p>
Urban Design	
<p><i>Site Vehicular Access</i></p>	<p>The reasoning behind the proposed vehicular access arrangement is provided in Section 4.3.3 of the RtS.</p>

Comment	Applicant Response
<p>Council does not support the proposed vehicular access configuration from Bridge Road for the following reasons:</p> <ul style="list-style-type: none"> • It necessitates excavation greater than 2m and requires a new retaining wall structure on the northern site boundary in the landscape setback. • There is no opportunity for connectivity to future roads in the large potential redevelopment site to the north such as the key east-west cross block connectivity investigated in previous strategies (Transport Strategy 2022) and as recommended in strategic planning advice over recent years. • The proposed 3m northern east-west pedestrian link, located above a retaining wall and contained by 2 x 1.8m fences, has low amenity and poor CPTED characteristics. The link is unlikely to service a future cycle link (minimum 3.5-5m path required), provide suitable universal access (minimum 1.8m path required) as well as generous space for shade tree planting as suggested in the applicant's Design Report (ref Clause 2.15). 	<p>The required excavation and retention structures have been supported by the geotechnical consultant and will not result in adverse impacts, subject to the adherence to the recommendations detailed within the Geotechnical Report.</p> <p>The proposed vehicular access point does not preclude future connectivity to the site to the north, if the redevelopment of this site eventuates.</p> <p>The through-site link has been designed to have a straight alignment and clear sightlines to improve visibility and reduce opportunities for concealment. Additionally, the link will be monitored passively by residents whose outlook is to the north.</p>
<p>Council recommends that the proposal be redesigned to facilitate primary vehicular access to the site from the private road to the south. This is the preferred site access arrangement, subject to negotiation with the adjacent landowner about ongoing easement rights over the existing southern private road.</p> <p>Access from the northwestern corner of the site should only be considered if the above option cannot be achieved and only if the following outcomes are confirmed:</p> <ul style="list-style-type: none"> • The driveway access is integrated into the built form, rather than located externally in the landscape setback. • The driveway is separated sufficiently from the northern boundary to not interfere with any future east-west road along the southern side of the adjoining site to the north. 	<p>Refer to Section 4.3.3 for a detailed justification for the vehicular access point.</p>
<p><i>Bridge Road Setback</i></p> <p>It is acknowledged that a 10.5m landscaped setback has been provided in line with advice from the Sydney Central City Planning Panel. However, Council would support a reduction in this front setback to 6m in order to accommodate a more generous & centralised communal open space between the two towers.</p> <p>In addition to the above, a clearly defined entry point to the site to assist with wayfinding to the tower lobby should also be investigated. Additional detail should be provided to demonstrate how level changes between the ground floor FFL and street level will be managed without the need for excessive stair and ramp access within the front setback. An activated edge with improved natural surveillance should be investigated.</p>	<p>Council's comments are noted, however the setbacks have not been amended to remain consistent with the draft controls for the site.</p> <p>However, in response to Council's comment the COS has been removed, and additional tree planting has replaced this area to improve the overall canopy coverage at the site.</p> <p>Further detail has been provided on the landscape plans which detail that the changes between the ground FFL and street level are appropriate and do not require excessive stair or ramp access.</p>

Comment	Applicant Response
<p>The hardscape landscape treatment proposed in the Bridge Road frontage responds poorly to the ground floor residential use. Council recommends significant greening along this frontage, comprising tree and screen planting to address privacy for residents as well as generous deep soil zones to appropriately offset urban heat.</p> <p>Direct street access to ground floor units should also be investigated.</p>	<p>Direct street access has been provided to the ground floor units fronting Bridge Road.</p>
<p><i>Street Address (Tower 'B')</i></p> <p>Council notes that the design of the proposal includes a shared 'super' lobby located within Tower A to serve both towers. The outcome of this design is the absence of a legible street address for tower 'B'. This is inconsistent with best practice and does not allow all buildings to contribute to local street character.</p> <p>This is considered essential to support the future amenity, convenience and access for future high density residential living. Tower B should have lobby access and address to both its northern elevation (in the event a road to the north eventuates) and to the southern private road. The applicant could explore reducing the northern podium setbacks, to a level commensurate with the recommended Bridge Road setback, to assist in achieving the above objectives.</p>	<p>The proposal provides a primary lobby within Tower A that establishes a legible address to Bridge Road, supported by a secondary lobby within Tower B which is accessible from the central communal open space or via a direct link from the Tower A lobby. We acknowledge that this arrangement does not provide a street address to Tower B at present, it nevertheless ensures clear and convenient resident access to both towers. If in the future a northern road eventuates, lobby access to the north could be provided.</p> <p>Accordingly, although Tower B does not currently have a direct street address, the proposal provides a functional dual-lobby arrangement thereby achieving the intent of the control and the site objectives.</p>
<p><i>Basements</i></p> <p>The relationship between proposed basement levels and ground level interface on all elevations of both buildings needs clarification. Current drawings indicate that basement structures protrude above ground level, which is not supported. Council recommends that the design of basement levels be revised (including the protruding basement car park frontage at the base of tower 'B') to ensure that basement levels do not protrude excessively above finished ground. Revised designs should include indicative basement levels, relevant dimensions, and complete building elevations for all frontages.</p> <p>In addition to the above, confirmation should be provided that the basement car park setbacks align with podium setbacks.</p>	<p>The topography of the site results in the extrusion of basement structures above ground level in some instances. The car park area however has been positioned so that it remains largely below ground. Refer to Appendix B for updated Architectural Plans.</p>
<p><i>Built Form (Podium, Towers, Tower Separation and Upper-Level Setbacks)</i></p> <p>Tower A is considered to be excessive in bulk and scale with a floorplate of approximately 1,150sqm gross building area, and 60m in width.</p> <p>Council supports the tower to podium setbacks recommended by the Planning Panel in the Design Guidelines. These included a 4m setback on the northern and southern elevations for both towers. The applicant's proposed reductions, to 2m on the north and 0m on the</p>	<p>Refer to Section 4.1.1 (Site-specific DCP) for a detailed response.</p>

Comment	Applicant Response
<p>south, are not supported. The reduced setbacks compromise the clarity of the podium/tower typology and present instead large towers landing on the ground. In addition, an appropriately articulated podium and tower form will improve wind conditions and pedestrian amenity at ground level.</p>	
<p><i>Public Domain Alignment</i> Council recommends that the applicant prepare a set of Public Domain alignment drawings detailing proposed public domain upgrades within the road reservation to support higher intensity use. The plans should be prepared prior to issue of any construction certificate for the site.</p>	<p>No works are proposed within the road reservation.</p>
<p>Social Impact</p>	
<p><i>Dwelling Mix</i> Council notes that the proposed dwelling mix does not align with the requirements outlined in the Parramatta Development Control Plan (PDCP) 2023. The proposal does not provide a diverse range of unit sizes, as 96.4% of dwellings are small unit sizes (one and two bedrooms). Council recommends revisiting the dwelling mix to reflect demographic trends within Westmead and the Parramatta LGA.</p>	<p>Refer to unit mix analysis at Appendix U.</p>
<p><i>Family-Friendly High-Density Design</i> Council recommends the design of family-friendly apartments, including three-bedroom apartments on ground or podium level with direct access to outdoor space. Grouping family-friendly apartments together and integrating permanent playable elements within the outdoor space are also recommended.</p>	<p>A diversity of apartment sizes have been provided at the ground and podium levels. Direct access to Bridge Road has been provided for the ground floor apartments of Tower A.</p>
<p>Traffic and Transport</p>	
<p><i>Traffic Generation and Mitigation</i> Council has concerns about the traffic modelling provided in the application's Traffic Impact Assessment (TIA), as it relies on data from the Planning Proposal.</p> <p>Traffic changes resulting from Council's Toongabbie to Westmead Pedestrian and Cyclist Corridor project need to be considered and reflected in updated modelling. It is noted that as a result of Council's work, there will be additional traffic at the intersection of Byrne Street and Bridge Road that will need to be remodelled as well.</p>	<p>Refer to Section 4.3.3 of the RtS for a detailed response.</p>

Comment	Applicant Response
<p><i>Parking Provision</i></p> <p>The proposed provision of 391 car parking spaces for residents and 48 spaces for visitors is supported. Additionally, 549 bicycle parking spaces (for residents) and 55 visitor spaces are proposed in accordance with PDCP 2023. A condition of consent is recommended requiring these spaces.</p> <p>In addition, it is noted that the TIA identifies that nine (9) motorcycle parking spaces will be provided in the development. However, only eight (8) spaces are identified on the plans. Plans should be updated accordingly.</p>	<p>Noted. An additional motorcycle space can be provided within the basement car park to address this comment. This could form part of a consent condition.</p>
<p><i>Car Park Design</i></p> <p>Parking spaces adjacent to columns in the basement may obstruct access, reducing aisle widths. Aisle widths must meet Australian Standards, or swept paths should be demonstrated to show that access to spaces can be made with an acceptable number of manoeuvres. Bicycle parking spaces should also be allocated to the same unit to avoid accessibility issues.</p>	<p>The car parking layout has been designed in accordance with AS/NZS 2890.1:2004 and is subject to further design development as part of detailed design. Spaces and aisles are compliant with AS/NZS 2890.1:2004 with respect to the user class and therefore swept paths to individual car parking spaces is not required. It is anticipated there would be a standard consent condition requiring compliance with AS/NZS 2890.1:2004 which would address this comment.</p> <p>This is confirmed in Ason's Addendum Traffic letter at Appendix H.</p>
<p><i>Construction Traffic Management Plan</i></p> <p>Construction vehicle routes need to be mindful of any bridge/culvert structures that are owned by Council particularly along Darcy Road and Briens Road (note that the bridges over the train lines are owned by Sydney Trains). Should access to the site by overmass vehicles be required, Council may require a structural assessment of the bridge/culverts to ensure that the overmass vehicle will be able to safely travel over them. This process will be managed through the NHVR process.</p> <p>In the event of the application's approval, it is recommended that a condition be imposed requiring approval from the National Heavy Vehicle Regulator for any oversize vehicles using local roads. In addition, it is recommended that a condition be imposed requiring a Road Occupancy Permit from Council for any works that involve occupation of any part of the footpath or (public) road during construction.</p>	<p>Noted. This could form part of a consent condition.</p>
<p>Landscape & Tree Management</p>	
<p><i>Landscape Communal Open Space</i></p> <p>The architectural and landscape plans appear to not be completely coordinated, as there are some paths and entrances into the building from the communal open space shown on</p>	<p>Distinctive and Group GSA have further coordinated their plans to ensure coherence, refer to Appendix B and Appendix E.</p>

Comment	Applicant Response
<p>the landscape plan that are not shown on the architectural plans on the eastern end. In addition, there are some narrow pinch points in the curved pathways which are not supported, for example there is a 900mm wide pinch point adjacent to a water feature (see figure below). This is recommended to be widened to avoid any potential conflicts along the primary accessible pathway.</p> <p>It is recommended the communal open spaces are consolidated into a larger, well-designed, easily identified, inviting, usable area to achieve a better design outcome. The consolidation of communal open space(s) would better align with the objectives and intent of Part 3D of the Apartment Design Guide.</p>	<p>The proposed COS areas are contiguous, and although spread across the site, provide a diversity of spaces to support varied needs and preferences.</p>
<p><i>Pedestrian Footpath & Road Reserve Design</i></p> <p>The pedestrian footpath adjacent to the private road includes a series of intermittent stops (labelled as '3' on landscape plans) that are paved areas which appear to have limited function. Council recommends that this area be redesigned to include a focal point and provide pedestrians with a reason to stop at these idents such as using feature plants or seating.</p> <p>In addition, Council recommends the deletion of the 1.8m separation fencing between the site and the private roadway and replacement with suitable landscaping to deter trespassers onto the site.</p>	<p>The intermittent stops provide space for overtaking on the footpath. Several feature points have been embedded within the design and seats are provided for pausing.</p> <p>The fencing has been retained but will be screened also with vegetation.</p>
<p><i>Central Communal Open Space Design</i></p> <p>Planting areas in the central communal open space appear to be quite narrow and incapable of supporting plants. In particular, areas adjacent to the BBQ covered facility (above the loading dock entrance) are too narrow to support landscaping.</p>	<p>The central communal open space will be capable of supporting the proposed planting.</p>
<p>In addition, it is unclear whether the proposed development achieves the minimum deep soil landscaping requirements recommended by the Sydney Central City Planning Panel, due to the basement structures underneath. Confirmation of compliance with this recommendation is required, in addition to documentation confirming ADG compliant soil depth and volume area.</p>	<p>The amended Landscape Plans (Appendix E) and Landscape Design Report (Appendix F) confirm that the proposal achieves deep soil landscaping consistent with both the Apartment Design Guide (ADG) and the Housing SEPP requirements:</p> <ul style="list-style-type: none"> • ADG Compliance: A total of 1,118.36m² (13.14% of the site) is provided as minimum 6m x 6m deep soil areas, exceeding the ADG requirement of 7% site area. • Housing SEPP Compliance: A total of 1,661.19m² (20.34% of the site) is provided as deep soil areas with minimum dimensions of 3m x 3m, exceeding the Housing SEPP requirement of 15% site area. <p>Accordingly, the proposal achieves and exceeds the applicable deep soil area requirements.</p>

Comment	Applicant Response
<p>Council notes that design drawings indicate that the communal open space between the towers is accessible from the southern access road. Confirmation that compliant access to the elevated central communal open space (shown RL 28.5) from the existing southern access road (existing RL 27.5) is achievable as indicated on all plans, as compliant access across the 10m setback appears improbable.</p>	<p>As identified within the Landscape Design Report Section 2.6, level access is provided from Bridge Road to the central communal space. The access path will grade appropriately from RL28 at Bridge Road to RL28.5 at the entrances to Building A and B.</p>
<p>Council recommends that for communal areas, contiguous (un-isolated) planter boxes for trees be provided.</p>	<p>The communal open spaces have been designed to accommodate a variety of landscaped spaces including contiguous planters.</p>
<p><i>Existing Tree Impact</i></p> <p>Council notes that the majority of existing trees are proposed to be removed from the site which is generally supported. However, trees 7 & 10 (Corymbia Maculata) located outside the site boundary will have a major encroachment (up to 25.9%) if traditional construction method of the footpath and planting is carried out within the tree protection zone (TPZ) of these trees. This is not supported. Up to 10% encroachment within the TPZ of a tree (as per AS 4970-2025 Protection of Trees on Development Sites) is considered acceptable. The non-destructive construction detail of any paths above the natural grade and planting method within the TPZ of trees 7 & 10 must be designed in conjunction with the project arborist to ensure neighbouring trees will not be adversely impacted by the construction works.</p> <p>Should protective measures for trees on neighbouring land be required to facilitate the proposed development, then the adjoining landowners consent must be obtained prior to determination of the application.</p>	<p>Refer to Aboricultural Impact Assessment and Tree Protection Plan prepared by Greenspace Arbor and appended to the EIS.</p> <p>This report outlines the approach to construction to be undertaken within the TPZ's to minimise impacts to existing trees.</p>
<p><i>Other Matters</i></p> <p>Council notes that the lower ground unit labelled 'B.L.G.01' includes a private open space (terrace) which narrows in width to between 1m-1.5m. The space adjoining the master bedroom is poorly design and would not be usable by residents.</p>	<p>The units have been amended to ensure that each dwelling achieves the required minimum private open space under the ADG. This is confirmed in the ADG schedule appended to the RtS.</p>
<p>Universal Access</p>	
<p>All aspects of the design must be delivered according to the requirements of the BCA, AS1428 suite and best practice universal design. The applicant is requested to seek expert access advice to ensure this is achieved. In addition, Council requests that the following matters be addressed.</p> <ul style="list-style-type: none"> No accessible path of travel has been provided to the principle entry /main lobby of Tower B (From Bridge Road) as required within BCA D4D3. 	<p>Refer to Section 2.6 of the Amended Landscape Design Report which outlines that the proposed paths of travel meet the accessibility requirement.</p> <p>The amended landscape design report includes a section on levels and accessibility. An accessible path of travel is provided from Bridge Road at RL28 to the upper ground level of building B which site at RL28.</p>

Comment	Applicant Response
<ul style="list-style-type: none"> • Continuous accessible paths of travel must link all the features within the common areas including the communal open spaces to the public park, kitchen garden and pedestrian streetscapes as required within BCA D4D2. • The controlled access gates must be accessible in both circulation areas and hardware provided. • 549 units are proposed with 56 units proposed to be accessible. However, Council requests that 15% of the units to be accessible in line with best practice. • 304 single rooms, 225 two-bedroom units and 20 three-bedroom units are proposed, of the proposed 54 accessible units all but 2 of the units are single bedrooms, this is not a suitable outcome and needs to be adjusted to provide an equitable provision of units. • The proposed post adapted wardrobe within unit type T39 encroaches into the required circulation space beside the bed. • Ensure the active leaf of doors provide a clear opening no less than 850mm. • Low level thresholds are required at all doors accessing outdoor and differing areas. • The Abutment of differing surfaces shall have a smooth transition. Design transition shall be 0 mm. Construction tolerances shall be as follows: <ul style="list-style-type: none"> - (a) 0 ±3 mm vertical. - (b) 0 ±5 mm, provided the edges have a bevelled or rounded edge to reduce the likelihood of tripping. AS1428.1.7.2. • Equipment and furniture within the communal areas including the communal open spaces will require accessible and inclusive features suitable for a person with a mobility and other impairments. Note: AS1428.2 provides guidance on accessible furniture including, reach ranges and varying heights of tables and seats with back and arm rests. 	<p>Continuous accessible paths are provided to connect the communal open spaces, common area, public park and street. An accessible path and ramp has been provided along the Private Road.</p> <p>The controlled access gates can be designed to meet the circulation requirements in accordance with the BCA.</p> <p>The Architectural Plans have been amended to ensure that the apartment layouts are functional and offer a high level of amenity.</p>
<h3>Stormwater & Catchment Engineering</h3>	
<p>All drainage infrastructure must be designed to accommodate 5% AEP storms with 50% blockage in sag pits and 20% blockage in on-grade pits, with safe overland flow paths provided for the 1% AEP event under climate change conditions.</p>	<p>Refer to Section 4.3.6 of the RtS and the updated Stormwater Management Plan at Appendix O.</p>
<p>The Stormwater Drainage Plan and longitudinal sections must include the horizontal and vertical positions of all existing and proposed service utilities. All longitudinal drainage sections must include the Hydraulic Grade Line (HGL) for both 5% AEP and 1% AEP (with climate change).</p>	<p>Longitudinal sections have been provided within the updated Civil Engineering package.</p>

Comment	Applicant Response
<p>All stormwater drainage designs, pit constructions, and connections should comply with the Council's standard drawings.</p>	<p>Noted.</p>
<p><i>Connection to Council's Stormwater System</i></p> <p>For connection to Council's stormwater system, the following must be submitted:</p> <ul style="list-style-type: none"> • DRAINS modelling demonstrating the adequacy of the Council's stormwater system and confirming no adverse impact on existing connections. Both pre-development and post-development scenarios must be provided. • Demonstration that discharge at the connection point is less than or equal to predevelopment flows for the 5% and 1% AEP events. <p>A section 68 approval under the Local Government Act 1993 is required to allow connection to Council's stormwater pit.</p>	<p>Refer to Section 4.3.6 of the RtS and the updated Stormwater Management Plan at Appendix P, and DRAINS modelling at Appendix Q.</p>
<p><i>Water Sensitive Urban Design</i></p> <p>All WSUD and Gross Pollutant Trap (GPT) devices must be located to allow safe access for heavy vehicles to maintain the structures in accordance with WHS requirements. A brief report outlining background, modelling inputs and references, assumptions, treatment approach, results, conclusions, and recommendations must be provided, along with the electronic copy of the sub-catchment plans for WSUD elements.</p> <p>Council requests that an electronic copy of the MUSIC model, including relevant background information be submitted for review.</p>	<p>Refer to Section 4.3.6 of the RtS and the updated Stormwater Management Plan at Appendix P and Civil Plans at Appendix O.</p>
<p>Geotechnical Works</p>	
<p>Council notes that the submitted geotechnical report includes recommendations that are based on nearby investigations and previous experience. Notwithstanding, a detailed and comprehensive geotechnical investigation must be carried out on the subject site to assess the specific subsurface conditions. Boreholes must extend beyond Basement 4 (RL 11.90 mAHD) to appropriately assess subsurface conditions, including the influence of groundwater yield.</p> <p>According to the preliminary geotechnical investigation, the estimated annual groundwater inflow is between 2.8 and 6 ML/year. Council only supports the discharge of treated groundwater to Council's stormwater infrastructure during the construction phase. Post-construction discharge to Council stormwater infrastructure is not supported. Therefore, separate documentation must be provided explaining how groundwater will be managed and reused on-site after construction.</p>	<p>A detailed Hydrogeological Report has been prepared and is attached at Appendix M. For further details, refer to Section 4.3.4 of the RtS.</p>

Comment	Applicant Response
If this cannot be demonstrated, Council requests that all basement levels are fully tanked.	
Cycleways	
<p>Council requests that a shared path be provided along the Bridge Street frontage in accordance with the City of Parramatta Bike Plan 2023.</p> <p>In addition, Council is generally supportive of the provision of bicycle infrastructure within the proposed development. However, it is requested that at least 50% of visitor bicycle parking infrastructure be located adjacent to principal pedestrian entrances to the building to encourage active modes of transport.</p>	A bicycle path is not proposed as part of the development. We understand that Council is separately progressing with the Toongabbie to Westmead Pedestrian and Cyclist Corridor project.
Planning Matters	
<p><i>Intensification of Easement</i></p> <p>Notwithstanding whether the proposal is redesigned to facilitate primary vehicular access from the private road to the south of the site, the proposal will likely result in an increase in use of the right-of-way easement that the site presently benefits from. Whilst the terms of this easement appear to be sufficiently broad enough to enable this intensification of use, concern is raised over the possibility of updated easement terms being required to account for the significant uplift in density at the site. Council requests that the applicant investigate the potential legal ramifications of the intensification of use of the easement and consult with adjoining landowners over ongoing access, use, and maintenance of this road.</p>	Refer to Section 4.1.4 of the RtS.

Table 3 Agency Submissions

Comment	Applicant Response
TfNSW	
Freight and Servicing	
The Applicant has proposed three (3) small rigid vehicle (SRV) spaces and one (1) heavy vehicle rigid (HRV) space for loading and servicing. All new developments should be self-sufficient and cater for all loading and servicing on-site. The Applicant should not rely on	Ason Group have provided a detailed response and is attached at Appendix H . Ason Group have confirmed that outputs from the UFFM are addressed in Section 8.1 of the Transport Impact Assessment, which recommended a formal loading provision of two medium bays (SRV and small trucks) and one large bay (MRVs, HRVs and large trucks). The

Comment	Applicant Response
<p>the kerbside restrictions or designated visitor car parking spaces being available for site operations.</p> <p>The TfNSW Urban Freight Forecasting Model (UFFM) provides guidance to developers on how many loading zones are required for a development based on the proposed land use. Access to the tool can be requested at: https://www.mysydney.nsw.gov.au/lastmilefreight#UFFM</p> <p>The TfNSW UFFM recommends the provision of five (5) B99 spaces, however, the development's provision of loading spaces meets the requirements for MRV but does not have sufficient space for SRVs. TfNSW recommends that as part of the Response to Submissions (RtS) the Applicant considers allocating additional freight and servicing spaces to ensure sufficient space for MRV and SRV spaces to service future users of the development.</p>	<p>proposed development exceeds the minimum recommended provision provided by the UFFM.</p> <p>Ason Group has confirmed that any minor deliveries by B99 vehicles would be able to sufficiently occur within the available visitor car parking spaces as they are the equivalent of standard car spaces.</p>
<p>NSW DCCEEW</p>	
<p>Groundwater Take and Licensing</p>	
<p>The groundwater provided in the Geotechnical Assessment (Appendix AA) is deficient. The inflow analysis is based on assumptions with no site groundwater level data used to support the assessment. There is also suggestions of the basement design to be drained, however, this is not clear. Further assessment and analysis informed by site specific data is required to confirm the groundwater inflow volumes during construction and operation of the project.</p> <p>DPHI requests the proponent to:</p> <ul style="list-style-type: none"> • Complete further assessment using site data to quantify the maximum annual volume of water take due to aquifer interference activities during construction and operation. • Demonstrate the ability to acquire sufficient water entitlement unless an exemption applies. 	<p>Groundwater modelling has been undertaken, refer to Section 4.3.4 of the RtS and the Hydrogeological Report attached at Appendix M.</p>
<p>Water Access Licence</p>	
<p>Under the Water Management Act 2000, if groundwater is intercepted, a WAL must be obtained prior to any water take occurring, unless an exemption under the Water Management Regulation 2018 applies. An exemption may be available for water take during construction activities in coastal water sources under Clause 2 of Schedule 4 of the WM Reg, or where the groundwater take during construction or operation is less than or</p>	<p>This is address in the Hydrogeological Report attached at Appendix M and discussed in Section 4.3.4 of the RtS.</p>

Comment	Applicant Response
<p>equal to 3 mL per water year. To claim either of these exemptions, certain requirements must be met, such as the person claiming the exemption keeps a record of the water taken under the exemption and provides this to the minister within 28 days of the end of the water year, and the records are kept for five years. Further information on these requirements and other information on licensing and approvals and exemptions, including a form to report and record water taken, can be found: https://water.dpie.nsw.gov.au/our-work/licensing-and-approvals/water-access-licences-and-approvals/exemptions-for-water-licences-and-works-and-or-use-approvals</p> <p>DPHI requests the proponent to ensure a water access licence is obtained to account for the maximum predicted water take for construction and operation activities, unless an exemption applies under the Water Management Regulation.</p>	
<p>Groundwater Impact Assessment</p>	
<p>The DPHI requests the proponent to assess the impacts due to the aquifer interference activities in accordance with the NSW Aquifer Interference Policy and Framework if the take of groundwater is found to be greater than 3ml per year. As per recommendation above, the groundwater assessment is deficient in quantifying groundwater take due to the project.</p> <p>Additionally, the EIS has not provided an assessment of the impacts to groundwater due to construction or operation of the project. NSW DCCEEW Water Group notes that without groundwater take estimations and drawdown assessment it is difficult to assess the level of risk.</p>	<p>Groundwater modelling has been undertaken, refer to Section 4.3.4 of the RtS and the Hydrogeological Report attached at Appendix M.</p>
<p>FRNSW</p>	
<p>FRNSW have reviewed the EIS with particular focus to Sections 1, 5 and 8. FRNSW submit no comments or recommendations for consideration, nor any requirements beyond that specified by applicable legislation at this stage.</p>	<p>Noted.</p>
<p>Sydney Water</p>	
<p>Feasibility</p>	

Comment	Applicant Response
<p>A Feasibility Application under Sydney Water case number 217641 (CN217641) was lodged late last year for approximately 608 apartments. The Feasibility Advice Letter for CN217641 was issued on 21 November 2024. The advice remains applicable.</p>	<p>Noted.</p>
<h3>Water Servicing</h3>	
<ul style="list-style-type: none"> The proposed development is in Mt. Dorothy Water Supply Zone (WSZ). Our preliminary assessment indicates that water servicing should be available for the proposed development. Amplifications, adjustments, deviations and/or extensions will be required. Detailed requirements will be provided at the Section 73 application stage. 	<p>In 2024 Sydney Water provided a feasibility letter which accounted for a development comprising 604 residential units. This letter is appended at Appendix N. The letter confirms that the trunk drainage system will have capacity to service the DA, however augmentation will be required that can be assessed at S73 stage.</p>
<h3>Wastewater Servicing</h3>	
<ul style="list-style-type: none"> Wastewater servicing should be available to the site. However, a preliminary assessment identified wastewater capacity constraints downstream of the site, including the presence of a high-risk Category 1 overflow that may be impacted by the proposed growth. Hydraulic modelling will be required to understand the impact of the proposed growth on this Category 1 overflow. If there is increase in overflows, the hydraulic consultant will need to undertake an Options Assessment to identify works needed to ensure no further deterioration of the overflow. Amplifications, adjustments, deviations and/or minor extensions may be required. Detailed requirements will be provided at the Section 73 application stage. 	<p>The feasibility letter also confirmed that the following works to the sewer main will be required to support development for 604 units: upsize the 150mm sewer main to a minimum 225mm, downstream of the site, MH6803205 to MH1371214.</p> <p>Given the SSDA, will deliver less residential units than the feasibility assessment contemplated, it is therefore considered that appropriate water and waste water servicing can be achieved at the site.</p> <p>This will be subject to further detailed review at S73 stage.</p> <p>A Water Servicing Coordinator will be engaged to apply for a Section 73 application.</p> <p>A Growth Data Form will be prepared at the Section 73 stage.</p>
<h3>Section 73</h3>	
<ul style="list-style-type: none"> Given the scale and complexity of the proposed development, it is recommended that an Anticipated Section 73 application is submitted with Sydney Water. Anticipated Section 73 applications can be registered with Sydney Water once a development application has been lodged with the relevant consent authority. The proponent must engage an approved hydraulic consultant to conduct wastewater modelling and confirm whether there will be an increase in the frequency or volume of Category 1 overflows due to the proposed growth. If there is an increase, the consultant must carry out an Options Assessment to identify works needed to ensure no deterioration will occur in conditions at the overflows. 	

Comment	Applicant Response
<ul style="list-style-type: none"> Should the Department of Planning, Housing and Infrastructure (the Department) decide to progress with the subject development application, Sydney Water would require the following conditions be included in the development consent. <ul style="list-style-type: none"> Section 73 Compliance Certificate Building Plan Approval Further details of the conditions can be found in Attachment 1. The proponent should complete and return the enclosed Growth Data Form as part of their Anticipated Section 73 application. The Growth Data Form should be updated promptly with Sydney Water in case of changes. The Department is advised to forward the enclosed Sydney Water Development Application Information Sheet (for proponent) to assist the proponent in progressing their development. This Info Sheet contains details on how to make further applications to Sydney Water and provides more information on Infrastructure Contributions. 	
CASA	
Westmead Hospital Helipad	
<p>The building will not exceed 100 m AGL but is close to Westmead Hospital Helipad (approx. 700 m). CASA advises that potential impact on operations to and from Westmead Hospital Helipad should be investigated through an aeronautical impact assessment.</p>	<p>An Aviation Impact Assessment has been prepared by Aviation Projects and is attached Appendix T.</p>
Endeavour Energy	
Recommended Conditions of Consent	
<p>Endeavour Energy has prepared recommended conditions of consent.</p>	<p>We accept the recommended conditions made by endeavour energy.</p>
Substation	
<p>The Civil Engineering & Infrastructure Assessment Report prepared by Costin Roe Consulting dated 29 Feb. 2024, Revision A regarding whether electricity services are available and adequate for the development. It does not appear to indicate if for padmount substation no. 17293 is to be retained or augmented. From the Architectural Plans there does not appear to be any provision made for a new distribution substation.</p>	<p>A kiosk substation is proposed at the western end of the private road. The location of the proposed substation has been provided on the amended plans.</p>

Table 4 Community Submissions

Comment	Applicant Response
<p>Height</p>	<p>Refer to Section 4.3.1 of the RtS for a detailed response.</p>
<p>The proposed development has excessive height and density that is not within the character of the local residential area. The 30% bonus is also excessive, in addition to the existing controls of the site. The excessive height will result in a severe loss of solar access on Block D of the Monarco Estate.</p>	
<p>The proposed building height is excessive and not consistent with the surrounding area. A 9 storey or less building would be more appropriate for the area.</p>	
<p>The proposed development is uncharacteristically tall for the area and creates visual pollution.</p>	
<p>The proposed 2 x 28 storey buildings on Bridge Road are out of character with the area and would be more suited to Parramatta CBD.</p>	
<p>Amenity</p>	
<p>This will result in unacceptable shading of the Monarco Park and Monarco Estate from 11am for a significant duration of the year. Monarco Estate dwellings will have only receive 2 hours of sunlight during the Winter solstice.</p>	<p>Refer to Section 4.3.2 of the RtS for a detailed response.</p>
<p>Site Access</p>	
<p>The broader public and future residents of 93 Bridge Road will have access to Monarco Park, facilities and the private road. Further, the proposed public park will result in direct access to the private road unfenced areas of Monarco Park, resulting in trespassing.</p>	<p>Refer to Section 4.2.3 and Section 4.1.4 of the RtS for a detailed response.</p>
<p>There are no firm commitments to remove existing easements over the private road.</p>	
<p>Emergency exits from public areas are directed through the communal Monarco estate space rather than 93 Bridge Road's access.</p>	
<p>An exit to the south must be proposed to avoid entrapment of the public in the park in the event that the northern access is blocked.</p>	
<p>Privacy and Security</p>	

Comment	Applicant Response
<p>The proposal also includes a publicly accessible 'frontage' which bends around from Bridge Road into the Monarco private road, opposite the north of Block D, which will allow the public to walk on the private road.</p>	<p>A detailed CPTED assessment has been prepared by Group GSA which details the urban design principles that have been embedded within the scheme to minimise safety risks. Refer to Appendix D.</p>
<p>The proposed development threatens the security and privacy of the Monarco Estate through the unauthorised public access to the private roads via two fence gap and unsafe pedestrian access points that comprise residential security. Further, the positioning of the public park will result in trespassing on Monarco property.</p>	
<p>The proposed development will infringe on the private road and will be treated as public property, effectively 'piggybacking' off it for access. This undermines the intended security and privacy of Monarco Estate and is unacceptable for residents.</p>	
<p>Traffic and Parking</p>	
<p>The proposal does not provide sufficient on-site parking and will result in congestion.</p>	<p>Refer to Section 4.3.3 of the RtS for a detailed response.</p>
<p>The proposal will create a parking deficit of approximately 158 vehicles that will rely on street parking within a congested area. The proposal did not provide an adequate traffic management plan for the northern access and there are insufficient infrastructure improvements to Bridge Road. There was no consideration of the cumulative impact on local schools and services and a misrepresentation of proximity to railway stations.</p>	
<p>The proposed development will increase traffic and congestion along Bridge Road which is a critical road for emergency services vehicles, specifically for Westmead Hospital. It will exacerbate existing bottlenecks and on-street parking is already limited as a result of hospital employees.</p>	
<p>An additional 160 vehicles will use parking along Bridge Road or will attempt to access Monarco to find parking. The new northerly access road is also likely to add congestion for cars travelling north on Bridge Road. No additional lanes are proposed on Bridge Road for cars from the south and will create difficulties for those trying to enter the proposed entry.</p>	
<p>Residents may illegally access surrounding private spaces or driveways for parking, creating security and access issues</p>	
<p>The proposed development will increase the use of the Monarco Towers roundabout and will render the only access from South Westmead to North Westmead as useless. As such,</p>	

Comment	Applicant Response
the traffic study and numbers are a formula that is not meant for this proposed development.	
Aviation	
The proposal has not considered aviation safety, specifically the site's proximity to Westmead Hospital helicopter routes. This may interfere with helicopter flight paths to Westmead Hospital, which poses a risk in medical emergencies.	An Aviation Impact Assessment has been prepared by Aviation Projects and is attached Appendix T .
So broader impact from this level of development will be to move the helicopters flying into Westmead precinct to other spaces in Westmead that are already impacted. Aeronautical hazard as the RL is substantial relative to the Helipads	
Public Safety and Anti-social Behaviour	
The open public park with unclear boundaries invites loitering and anti-social behaviour.	This has been addressed in the Crime Prevention Through Environmental Design (CPTED) Report prepared by Group GSA (Appendix D). CPTED has been considered in the design, including passive surveillance, lighting and territorial reinforcement. The CPTED Report confirmed that the proposed development would reduce the site's existing 'medium' crime risk to a 'low' crime risk.
Waste Management	
No detailed plan shown for increased garbage and recycling loads for over 549 new units. Potential overflow or illegal dumping in neighbouring property or streets.	This has been addressed in the Operational Waste Management Plan prepared by Elephants Foot Consulting.
Wind	
A high-rise structure of 27 floors could create dangerous wind tunnel effects in the vicinity, especially between buildings. Downwash winds from tall buildings can make public areas and walkways hazardous.	Refer to Section 4.3.2 of the RtS.
Environment	
Loss of urban tree canopy and vegetation on the site, which contributes to heat island effect and reduces biodiversity. This will result in an increase in ambient temperature and decrease in green cover due to excessive hard surfaces (concrete/glass). Also, likely disruption to local bird and wildlife habitats, which currently use surrounding vegetation for shelter.	The proposed development will increase the provision of green space and canopy coverage of the existing site which will enhance the local ecosystem and mitigate impacts, such as the urban heat island effect. Additionally, a Biodiversity Development Assessment Report (BDAR) Waiver was issued by the Department, confirming that the proposed development is not likely to have any impact on biodiversity values.

Comment	Applicant Response
Procedural	
<p>The development references incorrect proximity to train stations (Westmead and Wentworthville), likely overstating convenience.</p>	<p>The site is located in an accessible area and is well-serviced by public transport including bus operations and train services. The site is within 400m walking distance of the 'Seventh Day Adventists Church, Bridge Road' bus stop, and is approximately 800m walking distance from Westmead Railway Station/Light Rail Station and Wentworthville Railway Station. For more detail, refer to Section 4.1.2 of the RtS.</p>
<p>Claims of "compliant" solar access are misleading, based on flawed or superficial analysis</p>	<p>Refer to Section 4.3.2 of the RtS for a detailed response.</p>
Community Impacts	
<p>The proposed towers clash with the low- to mid-rise character of Westmead and Wentworthville. This sets a dangerous precedent for future overdevelopment in a primarily residential suburb.</p>	<p>Refer to Section 4.3.1.</p>
<p>This development dose not bring any clear benefit to the local community.</p>	<p>The proposal will bring a number of benefits to the community including increased housing and affordable housing to support the growth of the Westmead Health and Innovation precinct, as well as a new 1,000m² public park. Refer to Section 5.3 of the RtS.</p>
Specific Impacts on Unit 710, Block D	
<p>The proposed development has specific impacts on Unit 710, Block D of Monarco Estate, including:</p> <ul style="list-style-type: none"> • Unit 710 will lose natural light during the winter solstice and will impact the liveability of the dwelling. Block D will experience sever shadow impact from the proposed towers. • Unit 710 will decrease in property value as a result of the proposed development, especially due to the lack of solar access. • The proposed public frontage area directly faces Block D and will result in privacy concerns and security risks 	<p>Refer to Section 4.3.2 of the RtS and Appendix C.</p>
Other Issues	
<p>The local area does not have sufficient school capacity to cater to the population growth as a result of the development.</p>	<p>This is beyond the scope of the project.</p>
<p>Overdevelopment of the site.</p>	
<p>Insufficient pedestrian and bicycle connections to Westmead Station .</p>	

Comment	Applicant Response
Increased pressure on existing infrastructure and the area's inability to support the development.	
Surrounding sites should increase height and FSR.	

Table 5 Planning Proposal (PP) Feedback

Comment	Applicant Response
Agency Feedback	
Affordable Housing	
The Planning Proposal proposes a loosely worded clause requiring affordable housing, with no further detail.	Refer to Sections 4.1.3 and 4.2.1 of the RtS for a detailed response.
Site Access	
It is unclear if the vehicle access to the site will be wholly via the proposed driveway from Bridge Road, located along the northern boundary of the site, or if vehicular access will be via the northern boundary	Refer to Section 4.2.3 of the RtS for a detailed response.
Community Feedback	
Built Form	
The PP allows for excessive height and density that is inconsistent with the local character of Westmead.	Refer to Section 4.3.1 of the RtS for a detailed response.
The proposed height will impact aviation activities.	
Amenity	
The PP allows for loss of solar access on adjacent properties, including the Monarco Estate and surrounding residential properties	Refer to Sections 4.1.4, 4.3.2 and 4.3.5 of the RtS for a detailed response.
Adjacent properties will lose views and privacy	
The construction and operation of the site will result in increased noise	
Traffic and Parking	
The PP does not accommodate sufficient parking and the development will result in increased traffic congestion and crowded streets.	Refer to Section 4.3.3 of the RtS for a detailed response.
The proposal will increase traffic and congestion along Bridge Road which is a critical road for emergency services vehicles, specifically for Westmead Hospital.	

Comment	Applicant Response
The PP has not considered impacts on infrastructure including existing public transport and cycleways.	
Insufficient traffic studies.	
Privacy and Security	
Privacy and security of the adjoining Monarco Estate will be violated and will allow for unauthorised access to the Monarco private road. This will result in trespassing and unsafe pedestrian access points	Refer to Section 4.1.4 of the RTs for a detailed response.
The PP encroaches on private land owned by Monarco Estate, resulting in privacy concerns.	
Public Safety and Anti-social Behaviour	
The open public park with unclear boundaries invites loitering and anti-social behaviour.	This has been addressed in the Crime Prevention Through Environmental Design (CPTED) Report prepared by Group GSA (Appendix D). CPTED has been considered in the design, including passive surveillance, lighting and territorial reinforcement. The CPTED Report confirmed that the proposed development would reduce the site's existing 'medium' crime risk to a 'low' crime risk.
Environment	
The PP will result in a negative impact on the environment including loss of vegetation	The proposed development will increase the provision of green space and canopy coverage of the existing site which will enhance the local ecosystem and mitigate impacts, such as the urban heat island effect. Additionally, a Biodiversity Development Assessment Report (BDAR) Waiver was issued by the Department, confirming that the proposed development is not likely to have any impact on biodiversity values.
Waste Management	
The PP will impact waste management and has not provided a sufficient waste management plan.	This has been addressed in the Operational Waste Management Plan prepared by Elephants Foot Consulting.
Community Impacts	
The proposed towers clash with the low- to mid-rise character of Westmead and Wentworthville. This sets a dangerous precedent for future overdevelopment in a primarily residential suburb.	Refer to Section 4.3.1 .

Comment	Applicant Response
This PP does not bring any clear benefit to the local community.	The proposal will bring a number of benefits to the community including increased housing and affordable housing to support the growth of the Westmead Health and Innovation precinct, as well as a new 1,000m ² public park. Refer to Section 5.3 of the RtS.
Procedural	
Inconsistency with the Westmead Place Strategy and Ministerial Direction 1.19 as the site has been identified as maintaining density and is not within 800m of Westmead Station.	This matter has been addressed within the Planning Proposal. For further details, please refer to PP-2023-2810. The proximity to the station has been addressed in Section 4.1.2 of the RtS.
Inconsistency with the Parramatta LSPS	The consistency of the proposed development with the Parramatta LSPS has been considered in the EIS in Section 4.1 .
Misleading documentation including proximity to transport and interpretation of Monarco Estate Land and Green Grid Link.	This matter has been addressed and clarified in Section 4.1.2 and Section 4.1.4 .
Other Issues	
The local area does not have sufficient school capacity to cater to the population growth as a result of the development.	This is beyond the scope of the project.
Overdevelopment of the site.	