# State Significant Development Application
# Response to Submissions

## SSD-80904224 In-fill Affordable Housing
## 93 Bridge Road, Westmead

Prepared for 93 Bridge Road Pty Ltd atf Bridge Road Unit Trust

**20.02.2026**
24240

Beam Planning acknowledge that Aboriginal and Torres Strait Islander peoples are the First Peoples and Traditional Custodians of Australia. We pay respect to Elders past and present and commit to respecting the lands we walk on, and the communities we work with.


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# Contents

## Figures



## Tables

## Appendices

| Appendix | Title | Prepared by |
|---|---|---|
| A. | Response to Submissions Table | *Beam Planning* |
| B. | Amended Architectural Plans | *Group GSA* |
| C. | Amended Urban Design Report | *Group GSA* |
| D. | CPTED Report | *Group GSA* |
| E. | Amended Landscape Plans | *Distinctive* |
| F. | Amended Landscape Report | *Distinctive* |
| G. | Survey Plan | *Veris* |
| H. | Addendum Transport letter | *Ason Group* |
| I. | Pedestrian Wind Tunnel Modelling | *RWDI* |
| J. | Natural Ventilation Letter | *RWDI* |
| K. | Detailed Site Investigation | *EGA* |
| L. | Detailed Geotechnical Investigation | *EI Australia* |
| M. | Hydrogeological Report | *EI Australia* |
| N. | Water Feasibility Letter | *Sydney Water* |
| O. | Amended Civil Plans | *ADW Johnson* |
| P. | Amended Stormwater Management Plan (including MUSIC modelling) | *ADW Johnson* |
| Q. | DRAINS Modelling | *ADW Johnson* |
| R. | Vertical Transport Letter | *Collective Engineering* |
| S. | Design Verification Statement | *Group GSA* |
| T. | Aviation Impact Assessment | *Aviation Projects* |
| U. | Unit Mix Social Impact Assessment | *Sarah George Consulting* |
| V. | Infrastructure Assessment Report | *ADW Johnson* |
| W. | CHP Letter | *Bridge Housing* |
| X. | Acoustic Letter | *RWDI* |

# 1.0 Introduction

This Submissions Report has been prepared by Beam Planning on behalf of 93 Bridge Road Pty Ltd atf Bridge Road Unit Trust in relation to the State Significant Development Application (SSDA) (SSD-80904224) for the redevelopment of 93 Bridge Road, Westmead (the site). This State Significant Development Application aims to redevelop a residential site in Westmead to deliver residential dwellings, including in-fill affordable housing.

The SSDA was lodged with the Department of Planning, Housing and Infrastructure (DPHI) and publicly exhibited for 28 days between 13 June 2025 and 10 July 2025. During this time, 22 submissions were received from relevant government agencies, organisations, and members of the public. This Submissions Report provides an analysis of submissions, actions taken since Public Exhibition, the Applicant's response to submissions and provides an updated justification of the proposed development.

This Submissions Report, as required under section 59(2) of the Environmental Planning and Assessment Regulation 2021 (EP&A Regulation), has been prepared in accordance with the DPHI's State Significant Development Guidelines, including Appendix C – Preparing a Submissions Report.

## 1.1 Project Overview

The 93 Bridge Road project proposes the redevelopment of an under-utilised site to support the growth of the Westmead Health and Innovation District. The proposed development will deliver new housing, including affordable housing, as well as public domain embellishments and the creation of a new public park.

Specifically, the development as exhibited comprised:

- Site preparation and excavation works, including the demolition of all existing structures on the site.
- Construction of two 28-storey residential towers with a maximum building height of 89.7m and a maximum gross floor area of 40,543m$^2$, comprising a total of 549 apartments, including 15% affordable housing.
- A four-storey basement, comprising 441 car parking spaces and services, including 391 spaces for residents, 48 spaces for visitors and 2 car share spaces, and 604 bicycle parking spaces.
- Vehicular access provided via Bridge Road.
- Associated landscaping and public domain works, including the delivery of a 1,000m$^2$ public park, communal open space and footpath embellishments.
- Extension and augmentation of physical infrastructure and utilities as required.

A summary of the key development metrics proposed is provided at **Table 1**.

**Table 1** Summary of key development metrics

| Component | Description |
|---|---|
| Project Area | 93 Bridge Road, Westmead |
| Proposed uses | • Residential accommodation (including market housing and affordable housing) which accounts to 40,542m$^2$ of residential GFA.<br>• 1,000m$^2$ recreation area (Public park) |
| Site area | 8,663m$^2$ |
| GFA | Maximum GFA of 40,542m$^2$ |
| Residential units | 549, including 80 affordable housing dwellings |
| Maximum height | Tower A: maximum building height of 87.2m<br>Tower B: maximum building height of 86.8m |
| Landscaped area | 2,4467.30m$^2$ (excluding public park) |
| Deep Soil | 1,118.36m$^2$ representing 13.4% of the site area (excluding the public park) |
| Parking spaces | 441 car parking spaces including 391 spaces for residents, 48 spaces for visitors and 2 car share spaces. |
| Estimated Development Cost | $334,515,774 (excl GST) |

## 1.2 Project Objectives

The principal objective of the proposed development is to deliver much-needed housing within the National Housing Accord period (by 2029). The NSW Government has committed to delivering 1.2 million new homes by 2029 under the National Housing Accord, and the proposed development will contribute 549 dwellings to the NSW Government's commitment. Specifically, the project objectives include:

- **Promote Housing Diversity and Affordable Housing**: Create a diverse mix of housing types including market and affordable housing of various sizes to cater to evolving demographic needs, ensuring the community is inclusive and meets the housing demands of the local area and LGA. The development will ensure equitable access to housing and alleviate housing stress.
- **Improve Local Amenity:** The development will revitalise an underutilised site to increase local amenity and activation, offering through-site links and a 1,000m$^2$ public park. It will create a space that is inviting and welcoming to the public, providing green space, a sense of place and opportunities for social interaction.
- **Support Employment Growth in the Westmead Health and Innovation District:** The proposal will create employment opportunities during the construction and operation of the development, supporting employment growth and generating economic activity within Westmead. The development will also provide housing within the Westmead Health and Innovation District, increasing housing opportunities for local workers and contributing to the area's broader housing supply.

## 1.3 Project Background – PP-2023-2810

The concurrent Planning Proposal (PP-2023-2810) is in the final stages of the statutory plan-making process following extensive strategic review, design refinement and agency consultation since 2019. Through the 2024 rezoning review, the Sydney Central City Planning Panel determined the proposal demonstrates strategic and site-specific merit and should proceed to Gateway Determination. In November 2024, the Panel endorsed a built-form outcome comprising an FSR of 3.6:1, a maximum building height of 69 metres and a requirement for a site-specific development control plan. Gateway assessment commenced in February 2025, and determination is anticipated in the near term.

Although the amended planning controls are not yet finalised or gazetted, the Planning Proposal has reached an advanced stage, and its strategic intent and built-form parameters are clearly established. The State significant development application has been prepared consistently with these endorsed controls and may therefore be appropriately assessed in parallel with finalisation of the Planning Proposal.

## 1.4 Site Context

| | |
|---|---|
| Address | 93 Bridge Road, Westmead |
| Legal Description | SP31901 |
| Site Area | 8,663m$^2$ |
| Owner | 93 Bridge Road Pty Ltd |


**Figure 1** Location Plan

### Locational Context

The site is located within a residential neighbourhood in the suburb of Westmead. Westmead is a suburb within the Parramatta Local Government Area and is located 1.5 km north-west of Parramatta CBD and 26km west of Sydney CBD. The site is in a highly accessible location, being an equidistance from Wentworthville and Westmead Train Stations and is within walking distance to the Westmead Health, Education and Innovation District.

The immediate site context is predominantly residential in nature. Higher density residential development is concentrated to the south of the site. To the west of the site are health and education uses, centred around Westmead train and light rail station. An aerial image of the site is shown below in **Figure 2**.


**Figure 2** Site Aerial
*Source: SIX Maps (edits by Beam Planning)*

# 2.0 Analysis of Submissions

Alongside DPHI's letter requesting additional information, a total of 22 submissions were received in response to the public exhibition of the SSDA. As shown in **Table 2**, 8 submissions were from State and local government agencies, and 14 submissions were from the public. It is noted that 2 of the submissions were submitted as comments or in support of the project, as opposed to objections.

**Table 2** Submissions Breakdown

| Stakeholder Group | Submission Name | Submission Type | Total |
|---|---|---|---|
| Agencies | DPHI | | 7 |
| | TfNSW | Comment | |
| | Department of Climate Change, Energy, the Environment and Water (DCCEEW) | Comment | |
| | FRNSW | Comment | |
| | Endeavour Energy | Comment | |
| | Civil Aviation Safety Authority (CASA) | Comment | |
| | Sydney Water | Comment | |
| Councils | City of Parramatta Council | Object | 1 |
| Public | Paro Planning representing Monarco Estate | Object | 14 |
| | Jitender Balani | Object | |
| | Craig Ballinger | Object | |
| | Penelope Bethune | Object | |
| | Name Withheld #1 | Object | |
| | Name Withheld #2 | Object | |
| | Name Withheld #3 | Object | |
| | Peter Deadman | Object | |
| | Name Withheld #4 | Object | |
| | Name Withheld #5 | Object | |
| | Kim Riley | Object | |
| | Steven Broussos | Comment | |
| | Name Withheld #6 | Object | |
| | Ramakrishna Bandi | Comment | |
| **Total Submissions** | | | **22** |

## 2.1 Summary of Submissions

To frame the response to submissions provided in **Section 0**, a summary of the issues raised in the submissions received is provided in **Table 3**.

**Table 3** Summary of Issues Raised

| Category | Stakeholder | Issue Raised |
|---|---|---|
| **Procedural Matters** | DPHI<br>City of Parramatta Council (CPC) | **Variation to Site Specific DCP**<br>• Building bulk<br>• Building length and depth<br>• Vehicular access point<br>• Upper level setback<br>• Car parking<br>• Through site link<br>• Public open space |

| Category | Stakeholder | Issue Raised |
|---|---|---|
| | DPHI | **Accessible Area Definition**<br>• The Department and several community members requested clarification on whether the proposed development is within an accessible area as per the Housing SEPP |
| | DPHI | **Affordable Housing**<br>• Affordable housing requirements under a LEP (LEP Affordable Housing) must be met in addition to the Housing SEPP Affordable Housing. |
| | DPHI<br>CPC<br>The Public | **Easements**<br>• Intensification of easements<br>• Terms of easement<br>• Easements to be retained and extinguished |
| **The Project** | The Public | **Infill Affordable Housing Bonus**<br>• Clarification was sought surrounding the height of the development and the application of the 30% height bonus. |
| | City of Parramatta Council<br>DPHI<br>The Public | **Public Park**<br>• Siting, design, and orientation of the proposed public park<br>• Management and maintenance arrangement for the park<br>• Public safety and CPTED |
| | DPHI<br>City of Parramatta Council<br>The Public | **Vehicular Access Arrangement**<br>• Vehicular access configuration and contention between whether access should be provided from Bridge Road or the private access road. |
| **Economic, Environmental and Social Impacts** | CPC<br>DPHI<br>The Public<br>CASA | **Building Height**<br>• The development is inconsistent with the character of the Area<br>• Aviation Impacts |
| | CPC<br>DPHI<br>The Public | **Residential Amenity**<br>• Natural Ventilation<br>• Overshadowing<br>• Solar access to public open space<br>• Dwelling mix<br>• Common circulation<br>• Pedestrian Wind<br>• Apartment amenity<br>• Communal Open Space<br>• Privacy<br>• Amenity of affordable housing |
| | TfNSW<br>DPHI<br>CPC<br>The Public | **Traffic and Parking**<br>• Traffic generation and traffic modelling<br>• Queries surrounding whether an appropriate amount of car parking has been provided<br>• Freight and servicing<br>• Car park layout and design |
| | Sydney Water<br>DCCEEW<br>CPC<br>The Public | **Ground and Water Conditions**<br>• A detailed Geotechnical Investigation was requested which included groundwater modelling.<br>• A Detailed Site Investigation is required. |
| | The Public | **Waste Management**<br>• Insufficient management of waste |
| | The Public | **Vegetation**<br>• Loss of trees and vegetation |
| **Other Issues** | The Public | • The local area does not have sufficient school capacity to cater to the population growth as a result of the development<br>• Overdevelopment of the site |

| Category | Stakeholder | Issue Raised |
|---|---|---|
| | | • Insufficient public benefit<br>• Intentions of the developer<br>• Insufficient pedestrian and bicycle connections to Westmead Station<br>• Increased pressure on existing infrastructure and the area's inability to support the development<br>• Surrounding sites should increase height and FSR |

# 3.0 Actions Taken Since Exhibition

## 3.1 Project Refinements and Amendments

The following amendments have been made to the design in response to the submissions received within the exhibition period:

- Additional landscaping has been provided in the Bridge Road setback, increasing the overall tree canopy coverage of the site to 40%.
- The communal open space (COS) has been removed from the Bridge Road setback. The amended proposal provides 2,650m$^2$ of COS which equates to 30.6% of the site area.
- The residential corridors from level 1 to level 8 of Tower A and from level 1 to level 7 of Tower B have been amended to be 'open' corridors in order to facilitate the cross ventilation potential of specific apartments.
- Selected apartment layouts have been refined to improve their amenity.
- Selected private open spaces have been revised to meet minimum size requirements.
- The northern on-site detention tank has been increased in volume.
- The deep soil zones have increased from 1,097m$^2$ (12.67%) to 1,118m$^2$ (13.4% site).
- The landscaped area has increased from 2,319m$^2$ (28.48% of the site excluding the public park) to 2,467m$^2$ (28.48% site) excluding the public park.
- Wind mitigation measures have been included within the building design as per the recommendations of the Pedestrian Wind Tunnel Assessment. Such features include:
  - The communal open space at the corner of Bridge Road and the private access road has been set down from the street level and surrounded with landscaping to buffer impacts from the wind.
  - Landscaping is embedded within the design of the communal open spaces to assist in dissipating wind.
- The ground floor units fronting Bridge Road, have been provided direct street access.
- An additional 12 dwellings are proposed to be dedicated as affordable housing to be managed by a CHP for a minimum 15 years to satisfy the Parramatta LEP 2023 affordable housing requirement.

## 3.2 Additional Assessment

The assessment reports (including any amended versions) listed in **Table 4** are either currently in progress or have been completed, as indicted, in response to the submissions received during the exhibition period.

**Table 4** Additional Assessments

| Technical Study | Assessment |
|---|---|
| Detailed Site Investigation | A Detailed Site Investigation Report was prepared by EGA to support the proposed development. The DSI is appended at **Appendix K.** The findings of the DSI are outlined in **Section 4.3.4** of this RtS. |
| Wind Tunnel Modelling – Pedestrian | The Department raised that given the proposed height of the buildings, an updated wind report that includes detailed wind tunnel testing be prepared.<br><br>As such, RWDI have undertaken a Pedestrian-level Wind Tunnel Micro-Climate Assessment which is attached as **Appendix I.** The findings of the assessment are outlined in **Section 4.3.2.** |
| Geotechnical Assessment and Hydrogeological Report including Groundwater Take Assessment and Groundwater Impact Assessment | A detailed Geotechnical Investigation was undertaken and a Hydrogeological Report was prepared by EI Australia in response to feedback received from the Department of Climate Change, Environment, Energy and Water (DCCEEW) and Parramatta Council. The Geotechnical Report and Hydrogeological Report is attached at **Appendix L** and **Appendix M**, respectively.<br><br>Refer to **Section 4.3.4** of the RtS for a detailed discussion. |
| Natural Ventilation Wind Tunnel Assessment | The Department raised concerned that several apartments identified as naturally ventilated (including Units A7.01, A7.06, A7.09, A7.10, A7.11, and B7.08) may not achieve adequate cross-ventilation due to reliance on windows facing articulation zones or similar areas and accordingly requested wind tunnel testing to demonstrate it. Following |

| Technical Study | Assessment |
|---|---|
| | consultation with RWDI, the project's wind consultant and Group GSA, it was determined that this issue could be resolved through a design change whereby open corridors were introduced on the required floors to improve natural cross ventilation performance.<br><br>As detailed in the letter provided by RWDI at **Appendix J**, this change will reduce the effect of stagnation within building recesses when compared to enclosed corridors. This proposed design change is anticipated to increase the pressure differential between the openings on the windward aspect and the openings facing the notch, as the design introduces a degree of pressure relief to the opposite aspect of the building form, and therefore is expected to improve the natural cross ventilation performance for these units.<br><br>Subject to making this design change, RWDI are of the opinion that the identified units will receive an appropriate level of natural cross ventilation and that further detailed wind tunnel testing will not be required. |
| Market Analysis | Parramatta Council raised concern with the dwelling mix proposed under the SSDA, stating that the proposed mix does not align with the requirements outlined in the Parramatta Development Control Plan (PDCP) 2023 and that the proposal does not provide a diverse range of unit sizes, as 96.4% of dwellings are small unit sizes (one and two bedrooms).<br><br>An assessment of the proposed unit mix from the lens of a social consultant, provided by Sarah George Consulting (**Appendix U**), has therefore been undertaken. The unit mix letter confirms the suitability of the proposed development in the context of the site.<br>As outlined in the letter, the proposed dwelling mix is supported on the basis that it will cater to the needs of local workers, supports housing affordability and will contribute to the growth of the Westmead Health and Education Precinct. |
| Vertical Transport Traffic Study | A Vertical Transportation Traffic Study has been prepared by Collective Engineering and is attached as **Appendix R**.<br><br>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.<br><br>Both outcomes provide a quality of service that satisfies the design criteria, the only difference being that the four-lift solution has the flexibility to accommodate move-in, move-out movements and that it is recommended that these movements be restricted to off-peak lifting periods for Tower B. |
| DRAINS Modelling | DRAINS modelling has been provided to support the Stormwater Management Plan and is attached as **Appendix P**. |
| CPTED | A Crime Prevention Through Environmental Design (CPTED) report has been prepared by Group GSA and is attached at **Appendix D.** |
| Aviation Impact Assessment | An Aviation Impact Assessment has been prepared by Aviation Projects in response to the Departments request. The AIA is attached at **Appendix T**. |
| Services Infrastructure Report | An amended Services Infrastructure Report has been prepared in response to the Departments request and is attached at **Appendix V.** |

The following technical reports have been updated to address the amended design of the proposed development:

- Architectural Plans
- Landscape Plans
- Urban Design Report
- Civil Plans
- Stormwater Report

# 4.0 Response to Submissions

## 4.1 Procedural Matters

### 4.1.1 Site Specific DCP

**Issue:**
Council and the Department identified several inconsistencies between the site-specific DCP prepared for the concurrent Planning Proposal (PP-2023-2810) and the proposed SSDA. In their key issues letters, the Department requested that *the SSDA 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:*

- *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).*

The Department also requested that an assessment against the final draft DCP controls be undertaken to demonstrate consistency with the objectives and controls.

**Response:**
The applicant acknowledges that certain aspects of the proposed SSDA design vary from the provisions of the draft DCP prepared in support of PP-2023-2810. These variations reflect the natural progression of the project from concept design to detailed design, where architectural, engineering, and site-specific considerations have necessitated refinements. While some elements do not align precisely with the draft DCP controls, the underlying intent and objectives of the controls are maintained.

Group GSA has prepared an overlay outlining where variations to the envelope established by the Planning Proposal are proposed, as shown in
**Figure 3**. This figure demonstrates the minor nature of the variations proposed, these variations are described in detail in **Table 5**.

It is noted that under the Planning Systems SEPP, SSDAs are not required to demonstrate compliance with DCPs. However, given the concurrent nature of the Planning Proposal, it is acknowledged that consistency with the draft DCP is desirable. Notwithstanding this, it was ultimately determined that given the long history of the Planning Proposal, the better approach was to leave the Draft DCP in its exhibited form and deal with the variations in the SSD, noting the variations are considered minor and the outcome of detailed design resolution. Importantly, they deliver a more refined urban, environmental, and functional response, consistent with both the objectives of the DCP and the broader strategic planning framework.

A detailed assessment of the proposal against the draft site-specific DCP is provided in the table below. Where variations are identified, these are accompanied by a clear planning and design justification.

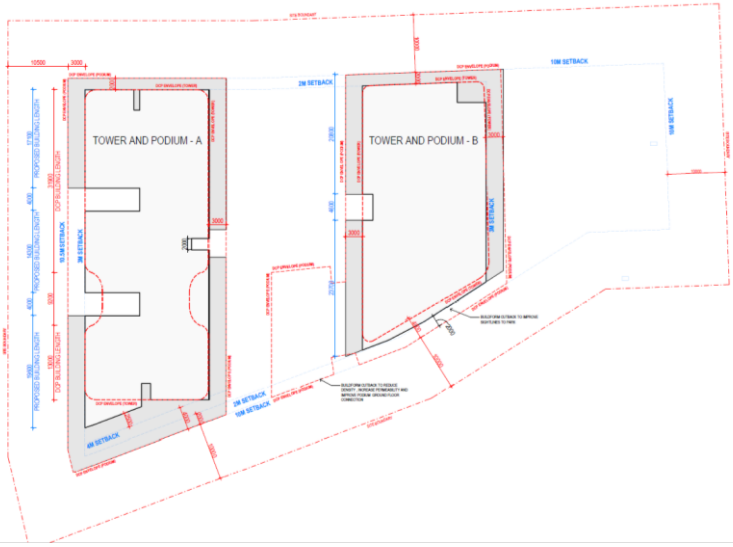
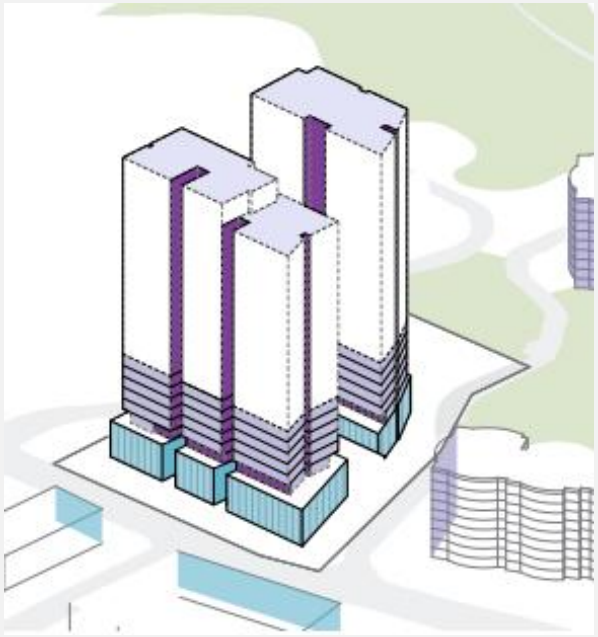



**Figure 3** DCP and PP envelope overlay

**Table 5** Site-specific DCP compliance table

| Control | Consistency | Comment |
|---|---|---|
| Desired Future Character | | |
| *Site Objectives*<br>• *O.01 Create a high quality, high density residential development to support the primary function and operation of the Westmead Health and Education Precinct and Innovation District.*<br>• *O.02 Ensure the built form features articulation and an attractive composition of building elements with a strong relationship between buildings and the streetscape.*<br>• *O.03 Provide appropriate provision of high-quality public domain elements, including footpaths and public open space, for the benefit of the existing and future community.*<br>• *O.04 Ensure building height is distributed across the Site having regard for orientation, overshadowing, and views/ vistas.*<br>• *O.05 Consider active ground floor uses along Bridge Road to increase the safety, use and interest of the street.*<br>• *O.06 Provide a visual and physical connection throughout the Site for a high level of surveillance and safety.*<br>• *O.07 Accommodate generated traffic and the mitigation of traffic effects, and the promotion of public transport to the Site.* | | |
| Controls<br>C0.01 Development is to be generally in accordance with the design principles in Figure 8.5.3.2a.<br>  <br> | ✓ | The proposed development has been designed in accordance with the adjacent figure. |
| **8.5.3.2 Building form and architectural design** | | |
| *Objectives* | | |

| Control | Consistency | Comment |
|---|---|---|
| • *O.01 Achieve high quality urban and architectural design, compatible with surrounding developments.*<br>• *O.02 Provide a high-quality built form and ensure that new buildings incorporate articulation, modulation and an attractive composition of the building elements.*<br>• *O.03 To ensure podium building heights are designed at the pedestrian scale to reduce visual bulk and the delivery of finer grain frontages.*<br>• *O.04 Reduce bulk of built form through articulation and modulation and appropriate tower separation from active ground plane*<br>• *O.05 Frame views toward, through and from the Precinct through the layout and design of built form and open spaces.*<br>• *O.06 Establish a desirable streetscape through podiums designed at a pedestrian scale, delivering fine-grain frontages across the Site and with a strong interface with Bridge Road*<br>• *O.07 Mitigate solar impact through the design of towers and podiums* | | |
| **Controls**<br>Building heights<br>• C.01 The maximum tower height is 69 meters, excluding lift overrun (approximately 20 storeys) | ✓ | The Planning Proposal will amend the Parramatta Local Environmntal Plan, to permit development to a maximum height of 69m at the site. The SSDA seeks to then utilise the infill affordable housing bonuses under Chapter 2 of the Housing SEPP to provide 30% uplift in terms of height. Applying 30% to 69m results in a maximum height limit of 89.7m. The propsoed development is seeking consent for a macximum building height of 87.2m.<br><br>The height contemplated under the SSDA is contingent on the finalisation of this Planning Proposal, meaning that the proposal cannot be approved without those new controls being in place. It is understood that as of January 2026 that the Planning Proposal is being finalised.<br><br>This is discussed further in **Section 4.2.1** of the RtS. |
| • C.02 To retain the human scale character of bridge Road, an indicative podium height of 3 storeys should be considered | ✓ | The podiums for Towers A and B do not exceed 3 storeys in accordance with the DCP. |
| Building length and depth<br>• C.03 Towers are to have a maximum floorplate length of 50m. Where a tower has a length greater than 30m, it is to be separated into at least two parts by a significant recess, projection or other distinct architectural expressions and features | ✗ | The maximum floorplate lengths for the towers are 59.6m, which exceed the recommended floorplate length of 50m in C.03, but is consistent with the actual length of the site-specific DCP envelope (see **Figure 3**). It would not be possible to comply with the maximum length control and utilise the envelope and associated floorspace anticipated in the Planning Proposal itself.<br><br>Noting the inconsistency in the Draft DCP, the proposal has been designed to include two 4 metre wide vertical indentations to articulate the towers in accordance with the second part of the control. This treatment minimises the perceived bulk and scale of the built form. |

| Control | Consistency | Comment |
|---|---|---|
| | |  <br>**Figure 4** Vertical recesses<br>*Source: Group GSA Urban Design Report*<br><br>Therefore, the proposal achieves the objectives of the part 8.5.3.2 of the DCP, including:<br>• The proposal is of a high quality built form which incorporates articulation and modulation of the building to provide an attractive composition of building elements.<br>• The bulk of the towers are reduced through the inclusion of the vertical recesses which define the towers as slender and elegant.<br>• Maximises solar access to neighbouring sites and public/ communal open spaces. |
| • C.04 Where a podium has a length greater than 70m, it is to be separated into at least two parts by a significant recess, projection or other distinct architectural expressions and features | ✓ | The maximum floorplate lenghts for the podium levels of both towers is 69m, which is in accordance with the DCP. |
| • C.05 Tower and podium depth is to accommodate apartment layouts that meet the design objectives, criteria and guidelines as defined in the Apartment Design Guide | ✓ | As identified in the Architectural Design Report provided at **Appendix C**, the proposed development provides tower and podium depths that accommodate apartment layouts that meet the design objectives. |

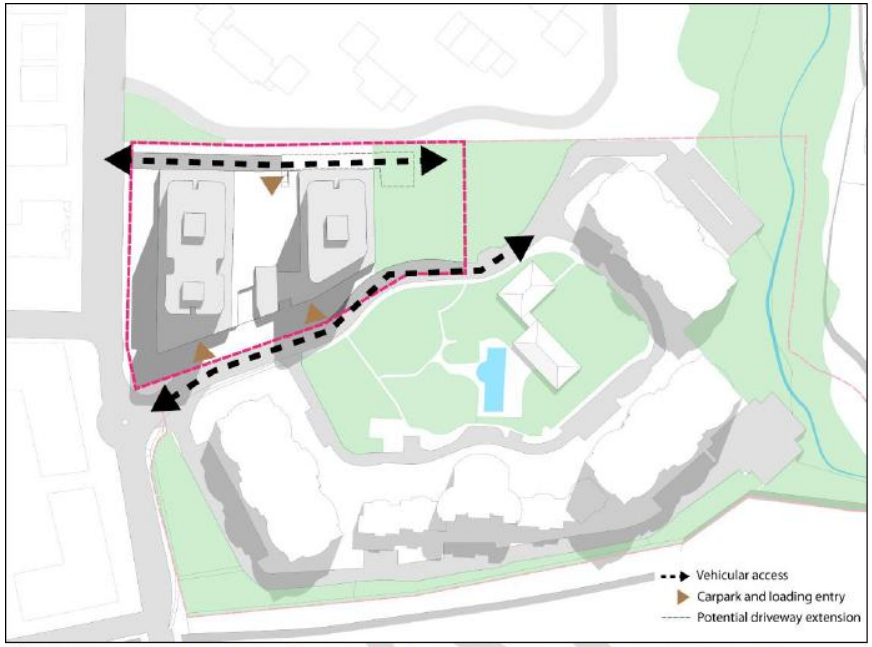
| Control | Consistency | Comment |
|---|---|---|
| Building bulk<br>C.06 Where a tower floorplate area is greater than 750m$^2$ Gross Floor Area (GFA), it is to be separated into at least two parts by a significant recess, projection or other distinct architectural expressions and features | ✓ | Building A has a tower floorplate greater than 750m$^2$ and has has been appropriately broken up with significant recesses to ensure that the bulk and scale of the tower is minimised (see **Figure 4** above). From Level 24, the tower form splits, providing a lower 24 storey form to the southern edge of the site, whilst the northern portion of the tower continues up to the top of the tower.<br>Therefore whilst the tower floorplate of Building A exceeds 750m$^2$, the proposal is consistent with this control, providing recesses which provide visual interest and reduce the bulk of the towers in accordance with the control.<br><br>Building B's floorplate is less than 750m$^2$. |
| Building orientation<br>C.07 Orient towers in North-South orientation to maximise solar access and natural ventilation for residents and minimise overshadowing impact on public, communal and private open spaces on site and for current and future neighbouring developments. | ✓ | The towers have been oriented in a north-south direction to maximise solar access and natural ventilation and to minimize overshadowing impacts to public open spaces, COS and neighbours.<br><br>This is discussed further In **Section 4.3.2** of the RtS. |
| Building setbacks<br>• C.08 Minimum 10.5m setback to the western boundary of the Site (Bridge Road).<br>• C.09 Minimum 10m setback to the northern boundary of the Site.<br>• C.10 Minimum 10m setback to the eastern boundary of the Site.<br>• C.11 Minimum 10m setback to the southern boundary of the Site. | ✓ | The proposed development provides compliant building setback to all boundaries. |
| Building upper setbacks (above the maximum podium height)<br>C.12 Minimum 3 m upper setback to the western boundary of the Site (Bridge Road).<br>C.13 A range of 2m to 4m upper setbacks to the northern and southern boundaries of the Site.<br>C.14 Minimum 3m upper setback to the eastern boundary of the Site. | ✓<br><br><br><br>✕ | The proposed development provides a minimum 3m upper setback to the eastern and western boundaries of the site, and a 2m upper level setback to the northern boundary in accordance with the DCP.<br><br>The podium has been pulled back from Tower B to create a consistent street wall, therefore no upper level setback is proposed for the southern façade of tower B. The envelope of Tower B is still setback 2m from the southern boundary in accordance with the DCP. This design move was made to improve CPTED outcomes at the site by improving sight lines to the public park from Bridge Road, and the footpath along the private road. This adjustment delivers a consistent street wall presentation which is softened by landscaping at the ground floor.<br><br>The proposal provides a varied upper-level setback along the southern façade of Tower A. At the eastern end, a 2 metre setback is provided from the podium below, with the setback progressively increasing towards the west. This design outcome is considered positive as it enhances solar access, while also assisting with wind mitigation by reducing downdrafts and improving pedestrian comfort at ground |

| Control | Consistency | Comment |
|---|---|---|
| | | level. The articulation created by the varied setbacks strengthens the overall built form composition and contributes to a high-quality residential environment in accordance with the objectives of the control. Accordingly, the proposal represents a superior planning and design outcome when compared with strict numeric compliance.<br>  <br><br>**Figure 5** Upper level setback diagram |
| Articulation<br>C.15 The podium facade next to public open spaces should be designed to blend harmoniously, minimising visual impact while enhancing passive surveillance | ✓ | Where the podium interfaces with public open spaces, CPTED principles have been incorporated within the design to minimise adverse risks. |
| Overshadowing of neighbouring development<br>C.16 Ensure development does not reduce minimum solar access requirement of neighbouring development (50% of the Public Open Space receives min 4hrs of direct sun between 9am and 3pm on 21 June and 50% of the Communal Open Space receives min 2hrs of direct sun between 9am and 3pm on 21 June) | ✓ | As discussed in **Section 4.3.2**, the proposal will not significantly impact upon the solar access to the neighbouring Monarco development of the proposed COS and public park. |
| General compliance<br>C.17 Compliance with *State Environmental Planning Policy No 65—Design Quality of Residential Apartment Development* (SEPP 65) and the Apartment Design Guide (ADG) is to be demonstrated for the residential component of the development. | ✓ | As outlined in **Section 4.3.2** of the EIS, the proposal has been designed in accordance with the design criteria and objectives of the ADG. |
| **8.5.3.3 Public domain and landscaping** | | |

| Control | Consistency | Comment |
|---|---|---|
| *Objectives*<br>• *O.01 Create well-defined and comfortable public spaces for casual recreation and encourage people to gather and relax*<br>• *O.02 Activate the public domain within and adjacent to the Site through the inclusion of:*<br>- *Non-residential corner activation on Bridge Road*<br>- *Ground floor residential on Bridge Road with direct access from the public domain*<br>- *a Public Open Space at east end of site*<br>• *O.03 Incorporate areas of soft and deep soil landscaping to enhance the green grid and add to the urban tree canopy.*<br>• *O.04 Ensure a high level of pedestrian amenity, safety and security.*<br>• *O.05 Investigate potential future provision of north-south shared street along east boundary* | | |
| **Controls**<br>C.01 The new Public Open Space and pedestrian links shall be provided in general accordance with **Figure 8.5.3.3a**<br>  <br><br>**Figure 8.5.3.3a Public Domain Concept for 93 Bridge Road, Westmead** *(Source: Distinctive, 2024)* | ✓<br><br><br><br><br><br>✕ | The proposed public open space has been designed with consideration of the DCP controls; however, some variations are proposed to improve the usability of the space.<br><br>The proposal achieves the minimum site area of 1,000m$^2$, which will provide capacity for 100% deep soil to support the growth of mature plating.<br><br>The SSDA does not adopt the 8m 'connection investigation' zone prescribed in the draft DCP, which sought to keep this area free of trees and fixed public furniture. This control originates from the Design Guidelines and was intended to future-proof a potential connection to the northern block. As this connection has not been committed to, the project team has instead prioritised the delivery of a high-quality landscaped public domain.<br><br>In this context, the SSDA proposes the introduction of canopy trees and landscaping within this area to enhance amenity, urban greening, and usability of the space, rather than reserving an inactive 8m wide corridor that would remain underutilised and is likely to be over specified for the level of usage. The proposed approach is considered to deliver a superior design outcome that aligns with broader objectives to provide shade, improve microclimate, and create a welcoming public environment.<br><br>It is also noted that should cross-block connectivity be formally pursued in the future, the design of the site retains sufficient flexibility to accommodate a new pedestrian connection at that time. |
| C.02 The design of the Public Open Space must comply with the following: | ✕ | |

| Control | Consistency | Comment |
|---|---|---|
| • Minimum site area of 1000m2<br>• Accommodate an 8m wide zone along the east boundary that is free of trees and fixed public furniture, to accommodate the potential future provision of a north-south through-site link<br>• Provide 100% deep soil (no underground car parking)<br>• Provide minimum 45% canopy cover<br>• Ensure the growth of mature landscaping<br>• Provide solar access and shading as follows:<br>- 50% of the Public Open Space receives min 4hrs of sun between 9am and 3pm on 21 June<br>- 20% of the Public Open Space is protected from direct sun light between 9am and 3pm on 21 December | | 40% canopy cover is achieved at the site. This is the maximum amount that can reasonable be achieved without impacting on the solar access to the park.<br><br>Solar access has been achieved in accordance with the DCP. Refer to **Section 4.3.2** for further detail. |
| C.03 Provide a pedestrian link connecting Bridge Road with the new Public Open Space. | ✓ | A pedestrian link has been provided along the northern boundary of the site, providing direct access from Bridge Road to the proposed public open space. |
| C.04 Publicly accessible open spaces are to be embellished with the following high-quality treatments:<br>• Integrated seating and other furniture<br>• Bins<br>• Landscaping<br>• Adequate shading<br>• Signage<br>• Adequate lighting to promote safety<br>• Public art where appropriate | ✓ | The public park will be appropriately embellished to include the required amenities and facilities as shown in the Landscape Plans appended to the RtS. |
| C.05 All public spaces are designed to be inclusive and universally accessible, to cater for all ages, enrich the community and provide infrastructure that promotes casual recreation, relaxation and maximises social interaction | ✓ | Accessible pathways have been provided throughout the park to ensure that the space can be accessed by all. |
| **8.5.3.4 Private domain and landscaping** | | |
| Controls<br>C.01 The development is to provide private open space for residents on the Site. This may be in the form of communal open space at ground or roof level, or private balconies for individual units. | ✓ | Each apartment has its own private open space which meets the requirements of the ADG. Additionally, a total of 3,115m$^2$ of communal open space is provided across the site. Communal areas are proposed at ground level, including spaces between Towers A and B, as well as to the east of Tower B where the development interfaces with the proposed public park. |

| Control | Consistency | Comment |
|---|---|---|
| | | These areas will be designated for the private use of residents and will contain a diversity of amenities including communal kitchen garden, urban forest, edge seating, BBQ facilities, play areas and water areas. |
| C.02 Provide 30% of the site area as Communal Open Space (as per Parramatta DCP)<br>• The Public Open Space is not permitted to be included for the purpose of calculating the area of Communal Open Space<br>• Communal Open Space may be located on podiums and rooftops, but minimum 25% of the required Communal Open Space must be at ground level | ✓ | The public open space has not been included in the calculations of COS, and all COS has been provided at ground level. |
| C.03 The design of the Communal Open Space must consider the following:<br>• Have a northerly aspect where possible<br>• Ensure the growth of mature landscaping<br>• Capable of accommodating active and passive recreational activities<br>• Accommodate passive surveillance from adjacent internal living areas and/or pathways | ✓ | The COS areas are oriented in a north south direction to maximise solar access.<br>Deep soil zones have been provided to support the growth of mature landscaping.<br>The COS includes areas for both passive and active recreation.<br>The proposed COS has been designed to maximise passive surveillance from adjacent residential dwellings and from the public domain. The COS will provide extensive landscaping and have been located in order to maximise solar access. |
| C.04 The design of the Communal Open Space must comply with the following:<br>• Provide landscaping and substantial vegetation<br>• Provide solar access and shading as follows:<br>- 50% of the Communal Open Space receives min 2hrs of sun between 9am and 3pm on 21 June<br>- 20% of the Communal Open Space is protected from direct sun light between 9am and 3pm on 21 December | ✓ | The communal open space at the site is capable of achieving the minimum 4 hours of sun on the 21 June. |
| **8.5.3.5 Access, parking and servicing** | | |
| **Controls**<br>C.01 Vehicular and building access is to be generally in accordance with the design principles in **Figure 8.5.3.5a** | ✓ | The vehicular and pedestrian access points to the building have been revised during the design development for the SSDA.<br><br>A new vehicular access point is proposed to the north of the buildings to connect to Bridge Road and provide basement car park access. No vehicular access is proposed via the private road, and this will be used solely by the residents of Monarco Estate.<br><br>Amendments have been made to the draft-DCP which supports the Planning Proposal, identifying the northern vehicular access point as the primary access point.<br><br>This outcome resolves the risk of dependence on a privately owned road and will improve traffic outcomes from the site. The design also preserves flexibility for a |

| Control | Consistency | Comment |
|---|---|---|
|  <br>**Figure 8.5.3.5a - Access and Servicing for 93 Bridge Road, Westmead** *(Source: Hatch, 2024)* | | potential future perimeter road, including provision for a vehicular connection through the privately owned public space.<br><br>This is further discussed in **Section 4.3.3** of the RtS. |
| C.02 Vehicular access via the perimeter road at the Site's northern boundary is preferable, provided that the permitter road is completed within the development lot boundary. | ✓ | Vehicle access to the site is proposed by a new private access road inside the northern boundary of the site, connecting with Bridge Road at its western end. |
| C.03 No direct access to the car park from Bridge Road | ✓ | Access will be provided via the proposed new driveway which separates the car park entrance from Bridge Road. |
| C.04 All car parking is to be provided in the basement or sleeved with residential/retail when located in the podium to minimise visual impact. No long-term car parking to be provided on ground. | ✓ | The topography of the site results in a mix of partial basement and partial above-ground levels, which are identified in the plans as lower ground level.<br><br>The car parking area has been strategically positioned so that it remains within the below-ground condition. This approach ensures the above ground portions, where natural light and ventilation can be achieved through windows are dedicated to apartments and habitable areas. |
| C.05 Car parking: | ✗ | The proposal complies with the minimum car parking rates prescribed by the Housing SEPP. The Housing SEPP prevails over the DCP. |

| Control | Consistency | Comment |
|---|---|---|
| a. Provide the following minimum car parking rates in accordance with Table 8.5.3.5.1 below. This references the parking rates stipulated at Section 8.0 of the Design Guidelines provided by the Planning Panel:<br>**TABLE 8.5.3.5.1 – CAR PARKING RATES FOR MARKET RESIDENTIAL AND RETAIL**<br>**Land Use** / **PDCP 2023 Rate (within an accessible area)**<br>Residential – Studio or 1-bedroom: 0.5 spaces per dwelling<br>Residential – 2 or more bedrooms: 1 space per dwelling<br>Visitors: 1 space per 5 apartments<br>Car washing space: 1 car washing space if more than 4 dwellings<br>Provide accessible car parking at a rate of 1 space per adaptable dwelling, and 1 space per 20 visitor spaces. | | The proposal generates a minimum residential parking requirements of 381 spaces under the Housing SEPP. The proposal provides 441 including 391 spaces for residents, 48 spaces for visitors and 2 car share spaces, thereby complying with the Housing SEPP rates. |
| C.06 Bicycle facilities:<br>• Provide facilities for cyclists including parking and storage.<br>• Public bicycle racks located at ground level must be provided to encourage the use of bicycles.<br>• Provide bicycle parking for the residential accommodation at a rate of 1 space per dwelling, and 1 space per 10 dwellings for visitors. | ✓ | The proposed development will provide 604 bicycle parking spaces including 549 spaces for residents and 55 spaces for visitors, in addition 9 motorcycle parking spaces.<br>Visitor bike parking racks have been provided within the lower ground car park and within the COS area between Buildings A and B.<br><br>The provision of bicycle and motorcycle parking is compliant with the DCP rates. |
| C.07 A Green Travel Plan is to be prepared and implemented for the development to promote reduced private vehicle use and encourage active travel modes including walking, cycling and public transport. | ✓ | A Preliminary Green Travel Plan has been prepared and is appended within the Traffic Impact Assessment submitted with the EIS. |
| **8.5.3.6 Sustainability, microclimate and water** | | |
| C.01 Adopt best practice in WSUD to minimise water use. Details are to be provided with the Development Application. | ✓ | Best practice WSUD strategies are proposed for the development as detailed within the Civil Plans appended to the EIS. Further details on the location of WSUD is provided in **Appendix P.** |
| C.02 Drought tolerant planting is to be used for landscape planting in the public domain and private communal open spaces. | ✓ | The proposed planting palette has been chosen from species typically found in the Western Sydney Dry Rainforest and Moist Woodland on Shale Profile ecosystems. These species are compatible with the environment of the development and are proven to be capable of thriving in this area. |
| C.03 Incorporate appropriate shade structures and canopy tree planting to create an appropriate microclimate in public domain areas, to ameliorate the temperature extremes of summer and winter. | ✓ | The proposal includes several shade structures and deep soil zones which can support the growth of tree canopies.<br><br>These areas will assist in ameliorating high temperatures during the summer months. |

| Control | Consistency | Comment |
|---|---|---|
| C.04 For optimum internal amenity, the design of dwellings is to maximise solar access and natural cross-ventilation for habitable rooms and private open spaces. ADG compliance is to be demonstrated as part of the Development Application. | ✓ | ADG compliance has been achieved. Please refer to **Appendix C** for further detail. |
| C.05 Consideration shall be given to the provision of solar hot water and solar photovoltaics within the development. Panels should be located to optimise orientation and efficiency and avoid areas that are overshadowed. If this cannot be achieved, evidence must be provided with the Development Application. | ✓ | The proposal has considered photovoltaics within the proposed development, as addressed in the ESD Report prepared by Arkes 4. Photovoltaics will be located on the roof the proposed development in accordance with the Parramatta DCP and further details will be provided at a later stage. |
| C.06 The provision of an on-site Central Energy Plant is to be considered in the design of the development. If this cannot be provided, alternative energy efficient mechanical systems must be incorporated into the development such as floor by floor condensers or centralised plant room for air-conditioning. Evidence must be provided with the Development Application. | ✓ | The proposal has been designed to achieve sustainability targets. Refer to the ESD report submitted with the EIS. |

### 4.1.2 Accessible Area

**Issue:**
The Department and several community members requested clarification on whether the proposed development is within an accessible area as per the Housing SEPP.

The Housing SEPP defines an accessible area as:

> ***accessible area*** *means land within—*
> *(a) 800m walking distance of—*
> *(i) a public entrance to a railway, metro or light rail station, or*
> *(ii) for a light rail station with no entrance—a platform of the light rail station, or*
> *(iii) a public entrance to a wharf from which a Sydney Ferries ferry service operates, or*
> *(b) (Repealed)*
> *(c) 400m walking distance of a bus stop used by a regular bus service, within the meaning of the Passenger Transport Act 1990, that has at least 1 bus per hour servicing the bus stop between—*
> *(i) 6am and 9pm each day from Monday to Friday, both days inclusive, and*
> *(ii) 8am and 6pm on each Saturday and Sunday.*

**Response:**
The site is well serviced by public transport options, being within 400m walking distance of the 'Seventh Day Adventists Church, Bridge Road' bus stop that supports the 705 and 824 bus routes which run from Monday to Sunday and meet the minimum service requirements in (c) of the definition of an accessible area. These buses run regularly and provide connection to Parramatta Station, Merrylands Interchange and Blacktown Station. The services are outlined below:

- **705 – Blacktown to Parramatta via Pendle Hill:** The 705 service operates Monday to Friday from 6:00 am to 9:45 pm, with multiple services each hour. On Saturdays, buses run from 7:00 am to 9:00 pm at a minimum frequency of one per hour. On Sundays, services operate from 7:41 am to 7:56 pm, also providing at least one service per hour.
- **824 – Parramatta to Westmead Hospitals via South Wentworthville:** The 824 service operates Monday to Friday from 5:40 am to 7:51 pm, with at least one service every hour. On Saturdays, services run from 6:10 am to 10:59 pm, also at a minimum frequency of one per hour. On Sundays, services operate to a similar timetable, with the last bus departing at 9:57 pm.

The site is also approximately 800m from Westmead Railway Station/light rail station (and future Westmead Metro Station) and Wentworthville Railway Station. Well established pedestrian footpaths are generally provided on both sides of most surrounding roads near the site. Signalised pedestrian crossings are provided on all approaches to the Darcy Road/Bridge Road and Bridge Road/Veron Street/Grand Avenue intersections, further improving accessibility.

### 4.1.3 Affordable Housing

**Issue:**
The Planning Proposal included an additional local provision requiring that 12 dwellings, or 3% of the GFA, be provided as affordable housing for a period of 15 years. The Department outlined that it is unclear whether this has been provided and that this local requirement is to be 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).

The Department stated that affordable housing requirements under a LEP (LEP Affordable Housing) must be met, in addition to the Housing SEPP Affordable Housing.

**Response:**
The SSDA proposal has been amended in response to the Departments clarification that "*the affordable housing local requirement in the Planning Proposal is separate from, and does not contribute to, the minimum affordable housing obligations under the State Environmental Planning Policy (Housing) 2021 (Housing SEPP) in-fill affordable housing provisions. Affordable housing requirements under a LEP must be met in addition to the Housing SEPP Affordable Housing*."

As such in addition to the 15% residential floorspace to be provided as affordable housing under Chapter 2 of the Housing SEPP, a further 12 units will be dedicated as affordable housing to be managed by a Registered Community Housing provider to satisfy the LEP requirement. This is confirmed in the CHP Letter attached as **Appendix W**.

### 4.1.4 Intensification of Easements

**Issue:**
Parramatta Council and several community submissions raised concern with the intensification of the private road that currently services the site and the adjacent Monarco Estate. Residents of the Monarco Estate also raised concern with the increase usage of the communal facilities by future residents of the residential flat building.

**Response:**
The proposal will improve the privacy and access arrangements into the Monarco Estate.

In direct response to the Monarco Estate residents' feedback, the primary vehicular access to the proposed development has been provided via a separate vehicular access point off Bridge Road. This will reduce the number of vehicles on the private access road noting that it is utilised by the existing townhouse development on the site.

Furthermore, as stated within the EIS, it is proposed to extinguish the easement for recreation which exists between SP 270360 (Community Association) and SP 31901 (93 Bridge Road) permitting the current residents of 93 Bridge Road to use the right of way and access the communal facilities in Monarco Estate.

Whilst the proponent cannot control pedestrians or vehicles illegally entering the Monarco Estate, the development provides a new high quality pedestrian link along the southern and northern boundaries of the site to facilitate pedestrian access to the public park as an alternative to the Monarco Estate.

## 4.2 The Project

### 4.2.1 Infill Affordable Housing Bonus

**Issue:**
Community members suggested that the proposed building height of the development is excessive when considered against the current planning controls, and that the proposal would undermine the objectives of the area.

**Response:**
The proposal is consistent with the statutory framework that applies to the site and does not exceed the development potential contemplated by the planning system. The project is underpinned by Planning Proposal PP-2023-2810, which seeks to amend the *Parramatta Local Environmental Plan 2023* to apply a maximum building height of 69 metres and a maximum FSR of 3.6:1. The SSDA is contingent on the finalisation of this Planning Proposal, meaning that the proposal cannot be approved without those new controls being in place. It is understood that as of January 2026 that the Planning Proposal is being finalised.

In addition, the development lawfully utilises the in-fill affordable housing bonus provisions of the Housing SEPP, which provide a 30% increase in building height and FSR where at least 15% of total GFA is delivered as affordable housing for a minimum period of 15 years. The proposal overlaid with the maximum height control of the LEP and the bonus afforded by the Housing SEPP is provided as **Figure 6**.

*Calculating the Floor Space Ratio Bonus*
Under Chapter 2, "Residential flat buildings" that provide at least 15% of the total GFA as affordable housing (in addition to any other affordable housing required under another planning instrument) for a minimum of 15 years is eligible for 130% of the permitted FSR control (in addition to the Height bonus described below). The 130% calculation is based on the maximum permitted FSR on the land (including any other bonus, such as design excellence, BASIX etc.).

The calculation of bonus FSR is based on the maximum total FSR of the development. Therefore, based on the above methodology, the following calculation has been made for this site:

- Base Allowable FSR (PP-2023-2810): 3.6:1 (on a site area of 8,663m$^2$).
- Base Maximum Allowable GFA: 31,186.8m$^2$

By applying the '30% bonus' to the 'base' floor space above, the following results:

- 31,186.8 + 30% = 40,542.84m$^2$

Therefore, the maximum GFA is 40,542.84m$^2$ (4.68:1).

A total GFA of 40,542sqm (4.68:1) is proposed which complies with the maximum permissible GFA for the site.

A total affordable housing GFA of 6,240m$^2$ is proposed which represents 15.39% of the total proposed GFA. The architectural plans show the location of the affordable housing units in the development.

*Calculating the Height*
"Residential Flat Buildings" that provide at least 15% of total GFA as affordable housing (in addition to any other required affordable housing required under another planning instrument) for a minimum of 15 years will be eligible for 130% of the Height of Building control for residential accommodation (in addition to the FSR bonus described above).
The site is subject to a maximum building height of 69m under the PP-2023-2810.

Therefore: 69m x 130% = 89.7m

The proposed maximum height of each of the towers is:

- Tower A: maximum building height of 87.2m (RL117.20)
- Tower B: maximum building height of 86.8m (RL116.70)

The proposal therefore fully complies with the intended statutory controls, while also delivering 15% affordable housing to support housing diversity and affordability in line with both State and Federal policy objectives.

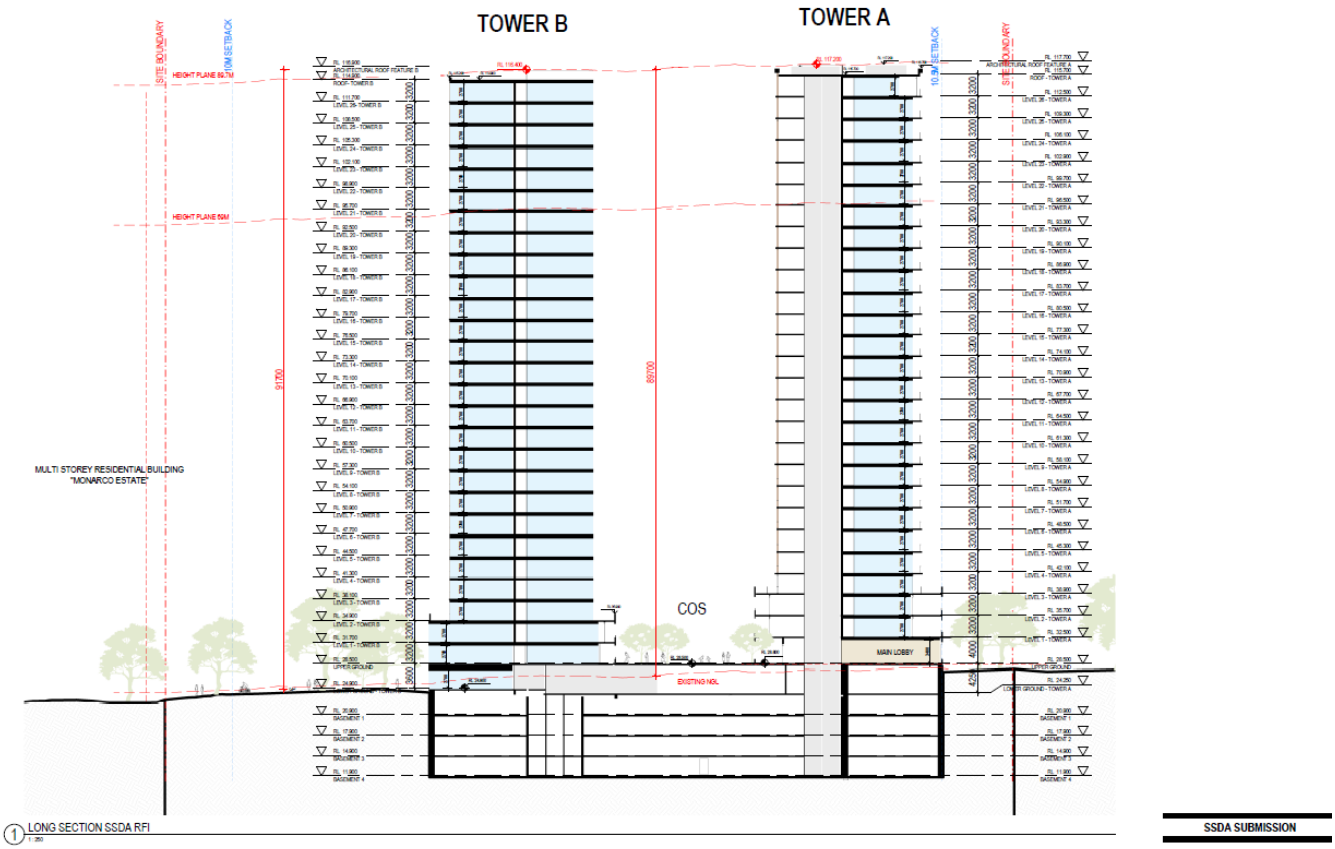



**Figure 6** Section Plan

*Source: Group GSA*

### 4.2.2 The Public Park

**Issue:**
Parramatta City Council raised concerns with the siting and location of the proposed public park. Council is of the opinion that the park lacks public edges and poorly interfaces with the adjoining built form, resulting in a private feel with limited accessibility to the wider community.

Council was also concerned that the park lacks appropriate children's play facilities and gym equipment and there are also safety concerns due to possible entrapment points, fencing of access by private road owners, and inadequate emergency access.

**Response:**
The siting, design and orientation of the proposed park was determined by the Planning Panel based on the Department's recommendation as part of the preparation of the Urban Design Guidelines and the site-specific DCP supporting PP-2023-2810. As noted in the Urban Design Report prepared for PP-2023-2810:

> *"The proposed park will be delivered as privately owned publicly accessible space. This reflects the adjacent open space typology within the Monarco Estate and addresses Council's concern regarding non-compliant public open space. The park will meet the Planning Panel's open space guidelines, including provision of amenities, solar access, and deep soil."*

The siting and location of the proposed park in the SSD is therefore consistent with the strategic planning process that has been undertaken for the site. It is also noted that if the park was relocated to Bridge Road, the towers would have a significantly greater impact on the solar access of the Monarco Apartments (see **Section 4.3.2**).

The park has been carefully designed to deliver a high-quality public space that enhances east–west pedestrian permeability through the site and retains flexibility for future north–south connections if required. Its configuration is consistent with the NSW Government Architect's Greener Places Framework, which recognises the role of semi-private, publicly accessible spaces in contributing to wider urban green networks. Within this context, the park will form part of Westmead's green network, providing a valuable space for passive recreation. It is also noted that the park has the potential to form part of a wider network of public open space should the land to the north be redeveloped in the future.

While the park itself prioritises passive recreation and urban greening, active recreation facilities, including children's play and gym equipment, are incorporated within the adjacent communal open space. This ensures a complementary distribution of facilities across the precinct and avoids duplication of uses.

The design has also been guided by Crime Prevention Through Environmental Design (CPTED) principles to address safety and accessibility, including:

- Maximising opportunities for passive and active surveillance;
- Providing clear and legible pedestrian connections; and
- Creating diverse spaces that encourage community interaction and reduce potential entrapment risks.

With respect to access, Council's concern regarding potential fencing of the adjacent private road has been addressed. A registered right-of-way easement benefiting 93 Bridge Road ensures legal public access to the park in perpetuity. In the unlikely event that this easement was ever extinguished, alternative access would remain available via the northern pedestrian link. Emergency vehicles can access the park via the private access road.

Overall, the proposed park provides a well-designed, safe, and accessible open space that complements adjoining communal open space facilities and contributes meaningfully to the public domain of Westmead.

### 4.2.3 Vehicular Access

**Issue:**
Council identified that they do not support the proposed vehicular access configuration from Bridge Road and recommended that the proposal be redesigned to facilitate primary access from the private road.

**Response:**
The proposed vehicular access from Bridge Road, as outlined in the EIS, remains the preferred configuration and was supported by the Central Sydney Planning Panel during its review in November 2024. This approach reflects detailed investigations which confirmed that reliance on the southern private road would present unacceptable risks. In particular, the road is under the ownership of an adjacent strata development, meaning long-term access rights cannot be guaranteed. Community feedback has also raised concerns regarding increased traffic reliance on this private road.

In recognition of these issues, amendments have been made to the draft site-specific DCP supporting the Planning Proposal, which now identifies the northern Bridge Road access as the primary vehicular access point. This outcome removes the risk of dependence on a privately owned road, delivers improved traffic outcomes, and ensures certainty for the long-term functioning of the development.

Importantly, the design also retains flexibility for the potential delivery of a future perimeter road, including provision for a vehicular link through the privately owned publicly accessible space should this option be pursued.

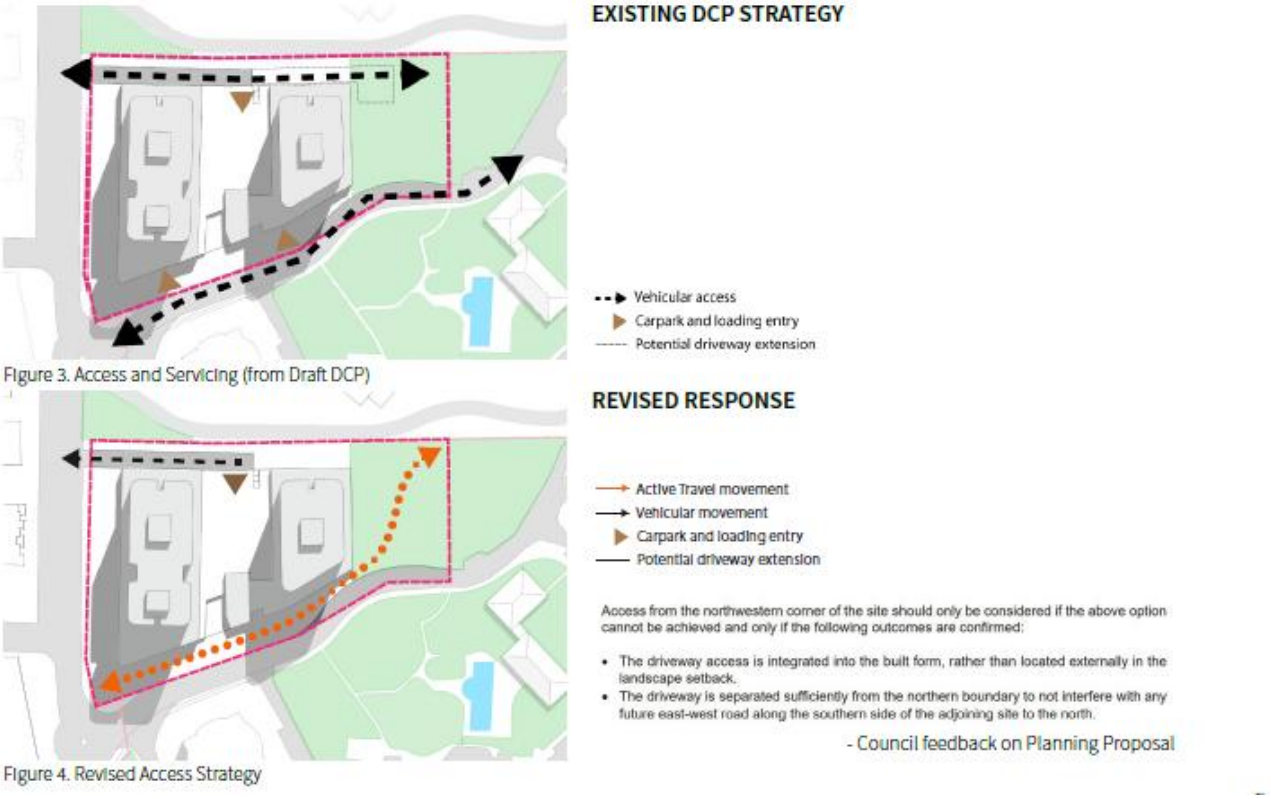



**Figure 7** Vehicular access arrangements

## 4.3 Economic, Environmental and Social Impacts

### 4.3.1 Building Height

#### Character of the Area

**Issue:**
Several community submissions raised issue with the proposed scale of the development, suggesting that the development is not consistent with character of the area.

**Response:**
The development responds to both the strategic and emerging built form context. Westmead is undergoing significant transformation as a health, education, and innovation hub. Increased building height and density on this site directly supports this role by delivering additional housing, both market and affordable, in close proximity to key infrastructure and employment generators.

Careful architectural design measures have been incorporated to ensure the proposed height is sensitively managed and does not result in unacceptable impacts. These include:

- Articulation and vertical recesses to break down building bulk and create slender tower proportions.
- Height transition, with Tower A stepping down to the south to reduce impacts on the Monarco development and neighbouring open space.
- Vertical separation and modulation to improve skyline presentation and reduce perceived massing.

In this way, the proposal not only complies with the statutory height and density provisions but also delivers a building form that is visually refined, contextually appropriate, and aligned with the area's evolving character.

#### Aviation Impacts

**Issue:**
The Department requested that an Aviation Report be prepared, detailing the proposal potential impacts on the helicopter landing sites within the Westmead Hospital Precinct.

**Response:**
An Aviation Impact Assessment (AIA) was prepared by Aviation Projects (refer to **Appendix T**) for the proposed development to assess potential impacts on aviation safety, nearby airports and, in particular, strategically important helicopter landing sites associated with Westmead Hospital.

The assessment was undertaken in accordance with the Airports (Protection of Airspace) Regulations 1996, relevant CASA requirements, and the National Airports Safeguarding Framework (NASF), including Guideline H – Protecting Strategically Important Helicopter Landing Sites. Four helicopter landing sites are located within approximately 3.5 km of the site, all associated with the Westmead health precinct. Of these, the Westmead Hospital A&E Rooftop HLS (YWST), located approximately 700 m east of the site, is the only facility where an interaction with the proposed development has been identified. The following impacts were identified:

- The proposed building and temporary construction crane do not intersect the published visual flight paths associated with the Westmead Hospital HLS.
- The instrument approach procedure (RNP 052) for the Westmead Hospital rooftop helipad would be partially infringed by the maximum proposed building height and temporary crane.
- The maximum building height that would avoid affecting the RNP 052 procedure is RL 108.2 m AHD, whereas the proposed development reaches RL 117.7 m AHD, resulting in a limited vertical penetration of the procedure. The crane would cause a temporary infringement only during construction.

The remaining nearby helicopter landing sites, Westmead Children's Hospital, Westmead CASB, and the Westmead Hospital Oval/CareFlight Base, are not affected, with no intrusion into their flight paths or protected airspace identified.

The AIA confirms that the identified impact to the Westmead Hospital HLS is manageable and can be addressed through established aviation safeguarding processes. Westmead Hospital specifically recommended that:

- The developer organises a NOTAM detailing the impact of the instrument approach
- The developer ensures that cranes associated with the build are appropriately illuminated with night vision devices and compliant lighting.

- That red aviation obstruction lights are placed on top of the building.

We would welcome suitable conditions of consent to ensure these measures are incorporated.

### 4.3.2 Residential Amenity

The Department requested clarity on several matters relating to the residential amenity of the development. The key items have been responded to below, whilst a comprehensive response to each of the matters has been provided within **Appendix A**.

#### Natural Ventilation

**Issue:**
The Department identified that several apartments marked as naturally ventilated (such as Units A7.01, A7.06, A7.09, A7.10, A7.11, and B7.080) do not appear to receive adequate natural ventilation as these units rely on windows that face articulation zones or similar areas which may limit airflow. The Department requested that wind testing be undertaken to verify that all apartments identified as naturally ventilated meet the ADG requirements.

**Response:**
In response to the Department's concern with the natural ventilation of units that face articulation zones, the project team have amended the design of the development to include open corridos on the affected floors. RWDI have undertaken a qualitative assessment of the proposed design amendments which is documented in **Appendix J** and summarised below.

In RWDI's opinion, the opening of the residential corridors on the affected floors, will reduce the effect of stagnation within building recesses when compared to enclosed corridors and increase the pressure differential between the openings on the windward aspect and the openings facing the notch. The proposed amendments will therefore promote natural cross ventilation via the concept of pressure differentials and therefore can allow these units to be naturally cross ventilated via pressure driven flow in accordance with the ADG in a similar manner to a corner or cross through unit. Group GSA have provided revised architectural plans confirming that the proposal will meet the 60% cross ventilation targets as:

- Tower A will provide 71/102 (69.6%) cross ventilated apartments
- Tower B will provide 47/71 (66.2%) cross ventilated apartments

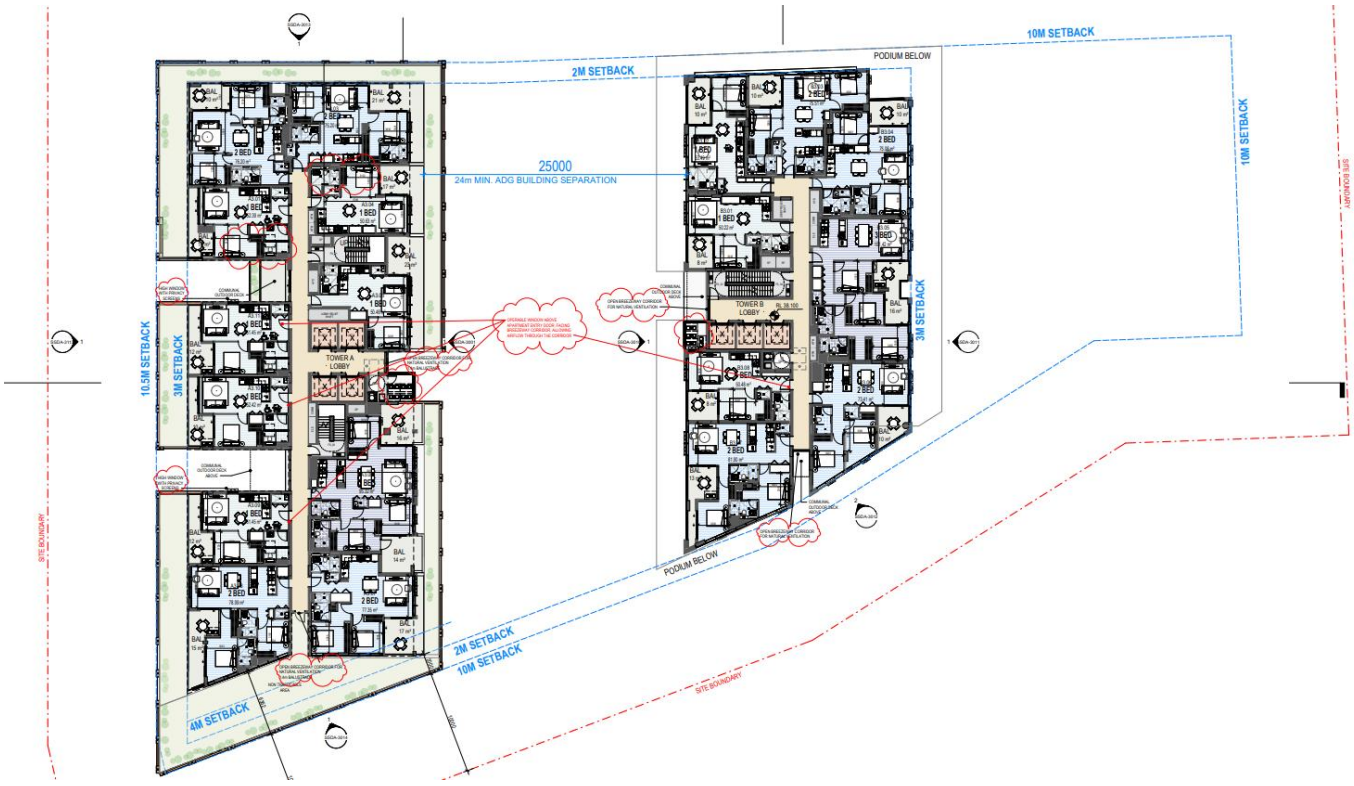



**Figure 8** Cross ventilation diagrams

*Source: Group GSA*

We expect that this analysis will provide assurance that the proposed development is capable of achieving a high level of residential amenity. Should further detailed wind tunnel modelling be required to confirm the findings of this letter, we request this is undertaken as a condition of consent.

## Overshadowing

**Issue:**
Several community submissions sought clarification on the potential overshadowing impacts of the development to the neighbouring Monarco Estate.

**Response:**
Group GSA has undertaken additional modelling to support the SSDA scheme and confirm that the proposal will not adversely impact upon the amenity of the Monarco Estate. This modelling is provided within the amended Urban Design Report and Architectural Plans attached as **Appendix B** and **Appendix C** and is summarised below.

As a result of the additional 30% height sought under the SSDA, only minor additional overshadowing impacts are to occur to the Monarco Estate. As demonstrated in **Figure 9** below, overshadowing of the Monarco Estate has largely been established by the PP building envelope, with only minor increases in overshadowing to the western and southern facades expected from 11 to 2pm attributed to the additional 30% height.

Group GSA has undertaken further solar access modelling to confirm the impacts, particularly to the northern façade of the Monarco Estate in response to the submissions received (**Figure 10**). The facade testing confirms that the most affected dwellings within the Monarco Estate, being the dwellings located on the northern façade of 91D Bridge Road are capable of receiving at least two hours of direct sunlight within a slightly extend period between 8:30am–3:30pm mid-winter.


**Figure 9** Overshadowing diagram PP and SSDA envelope

*Source: Group GSA*

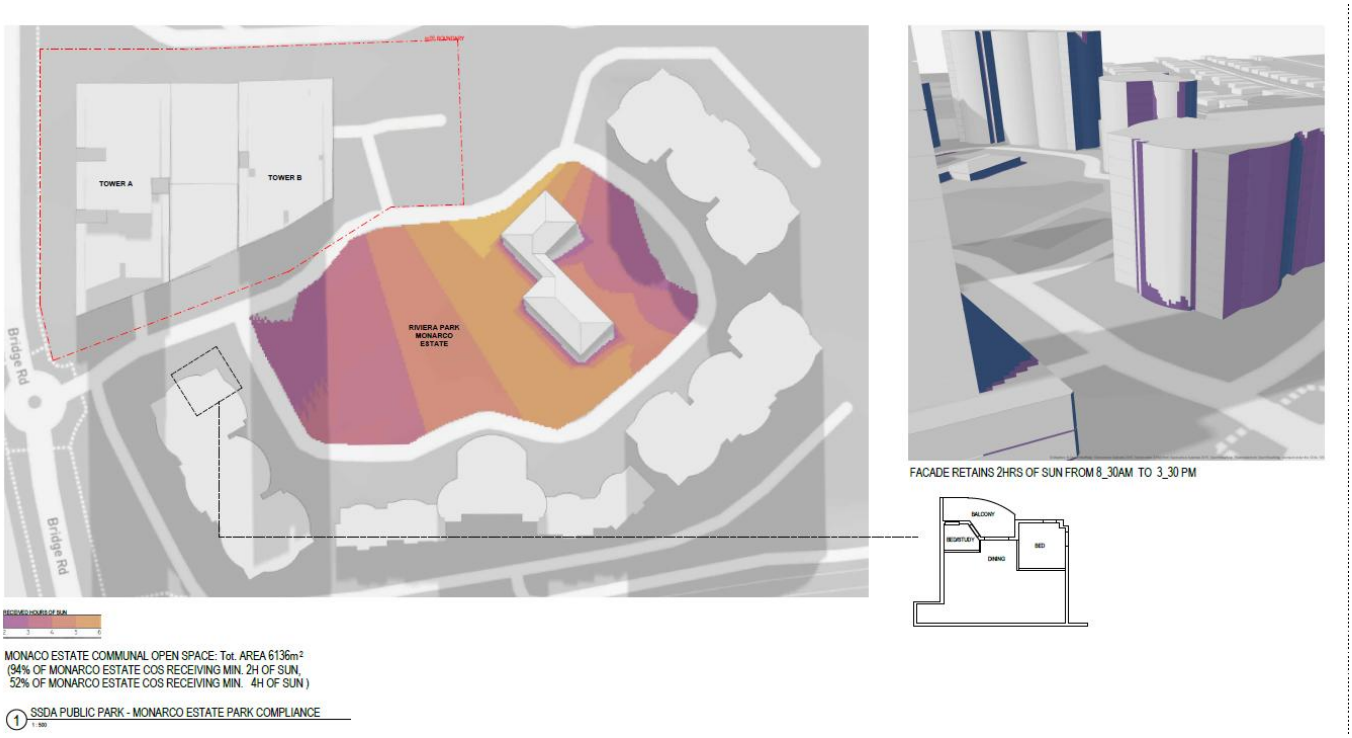



**Figure 10** Solar access to Monarco Estate

*Group: GSA*

Further modelling undertaken by Group GSA, demonstrates that 97% of the Monarco Estates Communal Open Space is capable of achieving a minimum of two hours of direct sunlight between 9:00am and 3:00pm mid-winter, with more than half (52%) receiving at least four hours. This performance significantly exceeds best-practice benchmarks, ensuring a high level of amenity. This is outlined in **Figure 11** below.

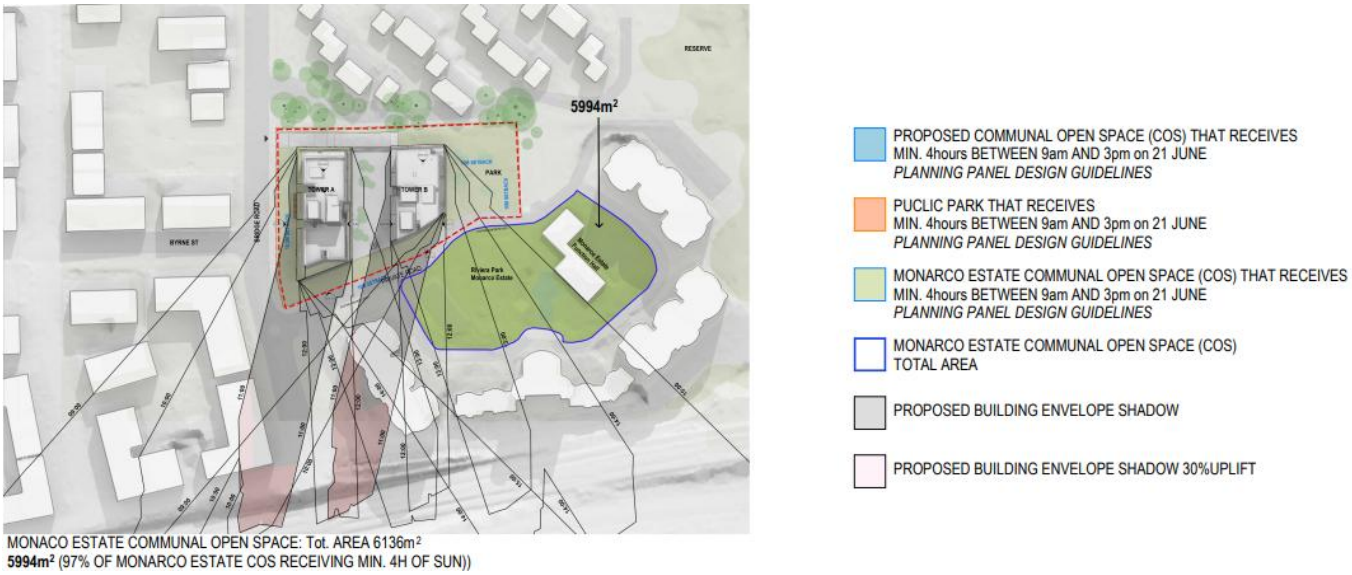



**Figure 11** Monarco Estate Communal Open Space Solar Access

*Source: Group GSA Urban Design Report*

Accordingly, the proposed development is compliant with ADG solar access objectives and delivers an appropriate balance of sunlight to dwellings and communal areas, while minimising overshadowing impacts to neighbouring residents. Further it is noted that in the Department's Practice Note for the Infill Affordable Housing Bonus, it provides guidance that standards "should be applied flexibly and need to be balanced against the need to realise more affordable housing". In relation to overshadowing it provides the additional guidance that when "the height and FSR bonus may not be achieved in full where the development would cause unreasonable overshadowing or would result in substantial reduction the mid-winter solar access available to existing dwellings." As demonstrated in the additional assessment, the impacts of the additional 30% height would not be considered to cause unreasonable overshadowing or result in a

substantial reduction of mid-winter solar access available to dwellings, and therefore in the context of the need to realise more affordable housing should be supported.

## Solar Access to Public Open Space

**Issue:**
Confirmation was requested on whether the proposed park will achieve solar access in accordance with the draft DCP.

The draft DCP requires that:

- 50% of the Public Open Space receives min 4hrs of sun between 9am and 3pm on 21 June and,
- 20% of the Public Open Space is protected from direct sun light between 9am and 3pm on 21 December.

**Response:**
Group GSA have prepared additional solar compliance diagrams which confirm that the entirety of the park is capable of receiving up to four hours of solar access during mid-winter. Trees have been strategically positioned to provide 20% shading across the park.

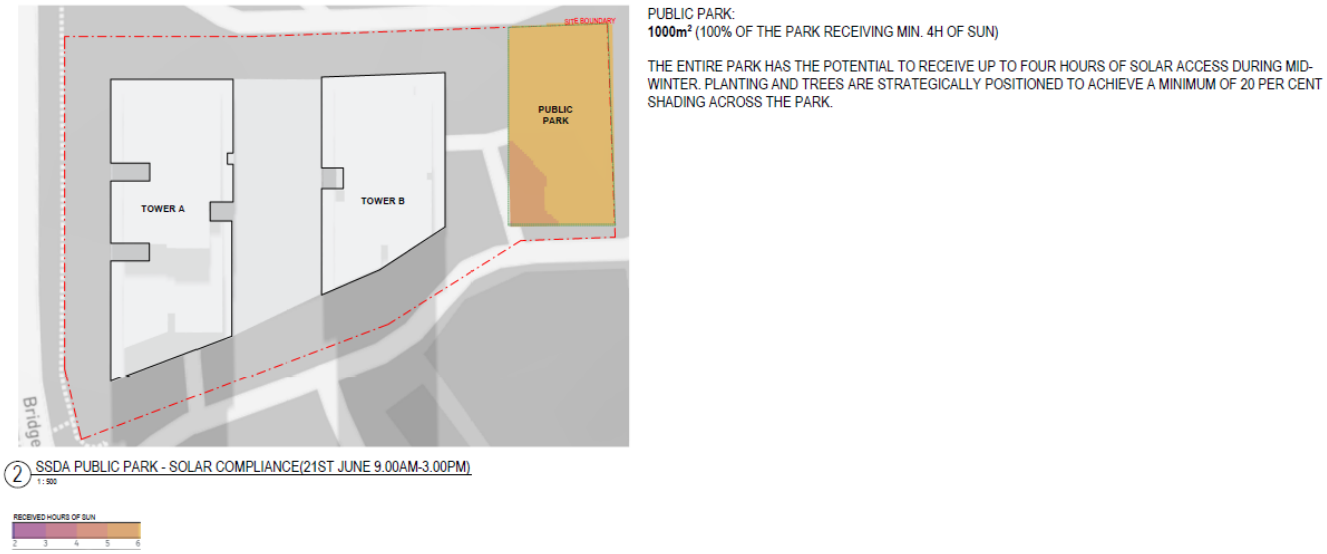



**Figure 12** Solar access to public space

*Source: Group GSA*

## Dwelling Mix

**Issue:**
Council raised that the proposed dwelling mix does not align with the requirements outlined in the Parramatta Development Control Plan (PDCP) 2023 and that 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 recommended revisiting the dwelling mix to reflect demographic trends within Westmead and the Parramatta LGA.

Council also recommended 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.

**Response:**
In response to Council's submissions, detailed analysis has been undertaken by Sarah George Consulting to justify the proposed unit mix, refer to **Appendix U**.

As outlined in the letter attached at **Appendix U,** the proposed dwelling mix is supported on the basis that it will cater to the needs of local workers, supports housing affordability and will contribute to the growth of the Westmead Health and Education Precinct.

### Common Circulation

**Issue:**
The Department sought clarification that the proposed lift arrangement could appropriately service the two buildings.

**Response:**
A Vertical Transportation Traffic Study has been prepared by Collective Engineering and is attached as **Appendix R**.

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.

### Pedestrian Wind

**Issue:**
Due to the height of the proposed buildings, the Department requested that an updated wind report be prepared that includes detailed wind tunnel testing including site-specific consideration of wind comfort and wind safety.

**Response:**
A Pedestrian-level Wind Tunnel Micro-Climate Assessment was undertaken by RWDI to support the development and is attached as **Appendix I.**

The pedestrian-level wind conditions within and around the proposed development were predicted using the results from a boundary-layer wind tunnel test combined with historical meteorological wind records for the region. The wind speeds have been evaluated against suitable criteria to assess pedestrian wind safety and comfort conditions. The results of the assessment are summarised as follows:

Pedestrian Wind Safety: Wind speeds exceeding the safety criterion were observed at the southwestern corner for the proposed site conditions.

Pedestrian Wind Comfort:

- Existing Configuration: Wind comfort levels at all locations were assessed to be comfortable for passive sitting to standing use.
- Proposed Configuration: With the inclusion of the proposed development, the wind speeds are expected to be suitable for the intended use of various spaces within and around the site, including at the building entrances, the surrounding streets, and the communal open spaces on the upper levels of the development. All private balconies are also expected to be suitable for intended use. on upper levels also achieve standing use or better. However, localised areas of moderately higher wind speeds, suitable for active strolling use, are likely to occur within the communal open space on upper-ground level between the towers.

RWDI provided the following wind-mitigation strategies which if incorporated with ensure that the site meets the applicable comfort and safety wind criteria:

- Ground Level: It is recommended to include an awning or standalone canopy (maximum porosity of 50%) at the southwest corner of the development over the seating area. Additional measures such as 1 m high impermeable screens around the perimeter of the sunken seating area and retention of the proposed landscaping/shrubs around the seating area are recommended to enhance wind protection.
- Upper-Ground: In the communal open space between towers, proposed landscaping with undergrowth can help reduce channelling winds and improve pedestrian comfort.

The architectural and landscaping plans have been subsequently amended in accordance with these recommendations.

## 4.3.3 Traffic, Parking and Accessibility

### Traffic Modelling

**Issue:**
Council has raised concern that the Traffic Impact Assessment (TIA) supporting the EIS should not rely on modelling prepared for the Planning Proposal. Community members have also expressed concern that the assessment does not accurately reflect impacts to the road network, given the revised vehicular access arrangements.

In addition, Council has requested that traffic changes resulting from the Toongabbie to Westmead Pedestrian and Cyclist Corridor project be considered in updated modelling, noting that additional traffic at the Byrne Street/Bridge Road intersection will require remodelling.

**Response:**
The TIA prepared by Ason Group acknowledges that the modelling was initially based on the Planning Proposal, which assumed a slightly lower residential yield and site access via the existing private road. Ason Group has confirmed that, notwithstanding these changes, the modelling provides a relevant and robust baseline for assessing the revised scheme. The TIA incorporated consideration of relevant future transport infrastructure projects and demonstrates that the proposal would have only a minor impact on the surrounding network. In addition, updated SIDRA modelling was undertaken to assess the operation of the new northern access point. This confirmed the new access would operate at Level of Service A.

Importantly, with traffic now directed via a new private driveway rather than the Monarco roundabout and southern private road, the roundabout is expected to operate more efficiently than previously modelled at the Planning Proposal stage. This is because development traffic will now move through the roundabout along Bridge Road, a more efficient movement than the turning manoeuvres previously assumed.

Broader precinct-wide traffic modelling is also being undertaken by Transport for NSW (TfNSW) as part of the Westmead Place Strategy. Discussions with TfNSW indicate that this modelling has accounted for the proposed uplift at the site, ensuring cumulative traffic impacts are addressed at a strategic level.

In response to Council's comments, Ason Group has prepared a cover letter (**Appendix H**). With respect to the Toongabbie to Westmead Pedestrian and Cyclist Corridor project, Ason Group understands that Wentworth Avenue (between Bridge Road and Reid Avenue) will be converted to one-way westbound traffic. While Council's detailed assessment has not been made publicly available, Council meeting minutes (8 July 2024) confirm that the change will result in "an acceptable minor diversion." Council's published responses to submissions also note that all intersections are expected to continue operating satisfactorily following implementation.

Based on this information, the proposed changes to Wentworth Avenue will not materially affect access to the site. The traffic modelling undertaken to date demonstrates that the proposed development will have only a minor impact on the road network, and the findings of the TIA supporting the SSDA remain valid.

### Car Parking

**Issue:**
Submissions were received requesting clarification on several car parking matters, including:
Several community concerns were raised with the proposed provision of on-site car parking and the impacts that the proposed new public park would have to on-street car parking within the private Road.

**Response:**
The proposed number of car parking spaces have been calculated in accordance with the requirements of the Housing SEPP. As is discussed in **Section 4.1.2**, the proposal meets the definition of an "accessible area" based on its proximity to a regular bus service. Therefore, the proposal is subject to parking rates in accordance with its capacity to support public and active transport usage.

The park is considered to be ancillary to the proposed development and is largely expected to be used by the residents of the proposal and surrounding area that will walk to the park. The existing road will continue to be marked as "private" and used only for providing access to the Monarco Estate.

## 4.3.4 Ground and Water Conditions

### Geotechnical

**Issue:**
The Department and DCCEEW identified that a detailed Geotechnical Assessment, which included groundwater modelling was required.

**Response:**
A Geotechnical Report was prepared by EI to support the proposed development. The purpose of the investigation was to assess site surface and subsurface conditions at five borehole locations, and to provide geotechnical advice and recommendations to assist in the design of the proposed development.

The Geotechnical investigations included the drilling of five boreholes. Three of these boreholes were later concerted to groundwater monitoring wells, with one of these boreholes (BH1M) extending 25m below existing ground level to meet the requirement for groundwater investigations and reporting.

Based on the results of the assessment, the following are the key geotechnical issues for the proposed development:

- Basement excavation and vibration
- Rock excavation and vibration
- Groundwater within the depth of excavation
- Existing footings of neighbouring properties
- Foundation design of building loads.

To minimise geotechnical impacts during construction, it is recommended that:

- Dilapidation surveys are undertaken prior to excavation and construction.
- Prior to excavation at least two test pits be excavated adjacent to the existing neighbour footings and be inspected by the geotechnical and structural engineers to assessment the requirement for underpinning the neighbouring footings.
- As a part of site preparation works all grass, topsoil, roots and deleterious fill or contaminated fill should be stripped.
- Excavation should be undertaken in accordance with the methodology proposed within the Geotechnical Report.
- Support systems should be provided to maintain the stability of adjacent structures and infrastructure during demolition, excavation, and construction.
- All footings are to be founded within shale bedrock of suitable strength.
- Drainage is to be provided underneath the basement slab, with the completed excavation inspected by a hydraulic engineer to confirm the extent of drainage required. If permanent discharge of seepage into the drainage system is required, permission will be obtained as appropriate.

Subject to the implementation of these measures, no adverse impacts are anticipated.

## Groundwater

**Issue:**
The Department and DCCEEW requested further information to clarify the maximum potential groundwater inflow volumes.

**Response:**
A detailed Hydrogeological Report including a Dewatering Management Plan (DMP) was prepared for the site by EI Australia (refer to **Appendix M**) to characterise groundwater conditions and to assess and manage potential impacts associated with basement excavation and ongoing groundwater seepage. A Groundwater Seepage Analysis was also prepared by EI Australia and is included within **Appendix M**.

The assessment identified that groundwater occurs primarily within fractured shale and is under confined to semi-confined conditions. Site-specific monitoring undertaken over a three-month period identified standing groundwater levels ranging between approximately 17.7 m and 21.6 m AHD, with groundwater consistently flowing in a north-easterly direction toward regional drainage lines. No registered groundwater supply bores were identified within 500 m of the site, confirming that groundwater is not relied upon for potable or commercial use in the locality.

Baseline groundwater quality testing indicates that groundwater is saline, mildly acidic and turbid, with some naturally elevated metals (including nickel, manganese and cobalt) exceeding guideline values for direct discharge. Importantly, no evidence of contamination sources was identified on or near the site, and groundwater quality exceedances are consistent with regional background conditions for shale-derived groundwater.

The proposed basement excavation will intersect the groundwater system and require temporary construction dewatering. Numerical groundwater seepage modelling predicts a low groundwater inflow rate, with an estimated total

groundwater take of approximately 4.6 ML over a 12-month construction period. Drawdown is predicted to be localised, with a radius of influence of approximately 20 m from the basement walls.

Predicted drawdown-induced ground settlement is up to 2 mm, which is classified as negligible and is not expected to result in adverse impacts to surrounding properties, infrastructure or land stability.

Dewatering will be undertaken using a sump-and-pump system, appropriate for the low-permeability shale conditions. Extracted groundwater will be directed through an on-site treatment system prior to discharge. Treatment will address turbidity, pH and dissolved metals to ensure compliance with the relevant discharge water quality criteria before release to the municipal stormwater system.

A comprehensive monitoring and reporting framework will be implemented, including:

- Ongoing groundwater level monitoring to confirm drawdown remains within predicted limits;
- Flow-metering to record total groundwater extraction volumes; and
- Routine water quality testing of treated discharge water.

Following construction any ongoing groundwater seepage during operation will be managed via permanent drainage infrastructure, with monitoring and treatment requirements refined based on construction-phase performance. Long-term dewatering has been assessed against the NSW Aquifer Interference Policy and is considered to meet the minimal harm criteria.

The investigations confirm that groundwater impacts will be localised, manageable and low risk. With the implementation of the proposed dewatering, treatment and monitoring measures, the development will not adversely affect surrounding properties, groundwater users, groundwater-dependent ecosystems or downstream waterways.

### Contamination

**Issue:**
The Department requested that a Detailed Site Investigation be prepared and submitted with the RtS package. Additionally, a Hazardous Building Materials Survey was requested.

**Response:**
A Detailed Site Investigation was undertaken by EGA to support the proposal and is attached as **Appendix K.** The DSI identified two potential areas of concern being:

- Onsite structures,
- Building footprints and hardstands.

The DSI concluded that the site may be suitable for the proposed development subject to a supplementary assessment of inaccessible soils following the removal of on-site structures/ hardstand and on-site structures, prior to demolition. A Hazardous Materials Survey is also to be undertaken prior to demolition.

We welcome the requirements for these additional studies be included as a condition of consent as requirement to be undertaken prior to CC1.

## 4.3.5 Noise and Vibration

**Issue:**
The Department requested clarification on the following noise and vibration matters:

- 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
- 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

**Response:**
RWDI, the projects Acoustic Consultant have reviewed these queries and provided a response in **Appendix X** and summarised below.

RWDI has advised that the Noise Intrusion Criteria from AS/NZS 2107:2016 which has been summarised in Table 3-1 of RWDI's Noise and Vibration Impact Assessment (NVIA) report (dated 16 April 2025) can be achieved with the windows and doors closed. The NSW Department of Planning document "Development near Busy Roads and Rail Corridors - Interim Guideline" (in Section 4.1.4 of the NVIA) stipulates that in instances where the internal noise exceeds criteria by more than 10dBA when the windows or doors are open, then ventilation for these rooms should be provided (via natural or mechanical means) to give occupants the option to meet the ventilation requirements of the Building Code of Australia (BCA) with windows and doors closed if they so desire.

It should be noted that with windows open, the allowable internal noise goal is 10dBA higher than when the windows are closed. Furthermore, there is no requirement under national or state guidelines to achieve simultaneous compliance of noise criteria and natural ventilation.

In regard to the operational noise impacts of the public open space and COS on surrounding developments it is RWDI's understanding that the envisaged operations do not include organised events involving amplified music. The park and COS will be used for typical activities such as passive recreation and small gatherings. As such, the COS and public park present a low risk to surrounding receivers and no mitigation measures would therefore be recommended.

### 4.3.6 Stormwater

#### Stormwater Infrastructure

**Issue:**
Parramatta City Council requested confirmation on the adequacy of the stormwater infrastructure to support the development. DRAINS modelling was requested, and Council also requested that the drainage modelling consider tailwater conditions, wind-driven rain from both towers, and climate change within the drainage model. In addition, Council requested that:

- 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.
- All stormwater drainage designs, pit constructions, and connections should comply with the Council's standard drawings.

**Response:**
ADW has designed the proposed stormwater management system in accordance with the Upper Parramatta River Catchment Trust (UPRCT) OSD Handbook (4th edition). The on-site detention system has been designed to minimise the effect of increased runoff from developments by attenuating peak stormwater flows leaving the site. It is proposed to use dedicated OSD tanks located within the north-west and south of the site to adequately attenuate the peak discharges generated from the site. The northern OSD tank has increased in volume in response to Councils feedback and to align with the requirements of the UPRCT handbook.

Council also requested demonstration that post-development discharge flow at the connection point is less than or equal to pre-development flow for the 5% and 1% AEP events. These scenarios were modelled using Watercom's DRAINS software package, and this model file has been provided as part of the submission package, in **Appendix Q.** As can be seen in the extract below, the post-development flows are over-detained relative to pre-development conditions.

| Design Storm Events | Peak Median Flows (L/s) | | Reduction Pre-to-Post (%) |
|---|---|---|---|
| | Pre-Development | Post-Development | |
| 5% AEP (No Climate Change) | 360 | 92 | 74 |
| 1% AEP (No Climate Change) | 464 | 105 | 77 |
| 1% AEP (SSP 3-7.0 YEAR 100 Climate Change Applied) | 785 | 396 | 50 |

**Figure 13** Pre and post-development flows

*Source: ADW*

#### Water Sensitive Urban Design

**Issue:**
Council requested that all WSUD and Gross Pollutant Trap (GPT) devices be located to allow safe access for heavy vehicles to maintain the structures in accordance with WHS requirements and that a brief report outlining background, modelling

inputs and references, assumptions, treatment approach, results, conclusions, and recommendations be provided, along with the electronic copy of the sub-catchment plans for WSUD elements.

**Response:**
ADW Johnson has designed a stormwater drainage system that incorporates a number of water quality treatment devices to effectively treat runoff generated by the development prior to it being discharged to the pit in the southeast corner of the site. This proposed system is outlined in the Stormwater Management Plan and Civil Plans provided at **Appendix O** and **Appendix P.**

The proposed treatment train has been modelled in the MUSIC water quality software to demonstrate compliance with Council's treatment targets. The proposed WSUD is outlined in Section 4.0 of the updated Stormwater Management Plan attached as **Appendix P**. MUSIC modelling has been undertaken in accordance with the "NSW MUSIC Modelling Guidelines - 2015" guidelines and Parramatta City Council's DCP Section 5.1.2.

# 5.0 Updated Project Justification

## 5.1 Additional Impacts Considered

The amended proposal incorporates refinements in response to feedback provided during public exhibition. The anticipated impacts of the proposed development, as amended, are likely the same as those proposed under the original application. Where requested additional assessment has been provided as part of the response to submissions and detailed in **Section 3.0**. The additional assessment confirms that the proposed development will not have any adverse environmental impacts.

## 5.2 Site Suitability

The proposed development is entirely suitable for the site for the following reasons:

- It is permissible with consent and will provide a built form outcome that is consistent with the statutory controls to be finalised under PP-2023-2810 and the controls afforded by the Housing SEPP.
- It aligns with the objectives and provisions of relevant environmental planning instruments, including the Housing SEPP and ADG.
- It supports and reflects several strategic objectives for housing supply, in particular affordable housing which will be managed by a registered CHP.
- It will offer high-quality housing within the Westmead Health and Innovation District and within proximity to key public transport services. This will facilitate strategic visions for the future of the Central River City, including the 30-minute city.
- It will deliver significant open space and public green space, enhancing residential and environmental amenity, and physical and mental well-being.
- The site is not significantly impacted by natural or environmental constraints.

## 5.3 Public Interest

The proposed development remains in the public interest for the following reasons:

- The proposal delivers affordable housing in an accessible location, directly responding to the NSW Government's policy mandate to improve housing choice and affordability. The site's location allows easy access to employment centres, retail, open space, and social infrastructure (schools, hospitals etc).
- Strengthen the role of the Westmead Health and Innovation District by providing housing to support rapid employment growth.
- Support the National Housing Target of 1.2 million new homes by contributing 549 new dwellings.
- Delivering a high-quality development that achieves a high level of residential amenity and is designed with consideration for the principles of ESD.
- Enhancing the public domain and surrounding landscape by providing a through site link, and range of communal spaces and amenities, fostering social cohesion and interaction within the local community.
- Supporting the aspiration for a 30-minute city by providing increased housing supply immediately adjacent to the Parramatta train station.

# 6.0 Conclusion

This Response to Submissions has considered all submissions received during and following the exhibition of the proposed SSDA for an infill affordable housing RFB development at 93 Bridge Road, Westmead. The updated project justification considers the amendments made to the proposed development in response to submissions and demonstrates that the impacts are acceptable.