

Department of Planning, Housing  
and Infrastructure  
4 Parramatta Square, 12 Darcy Street  
Parramatta NSW 2124

<b>Your Ref</b>	SSD-64916225
<b>Our Ref</b>	NCA/19/2023
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7/10/2025

ATTN: Ingrid Zhu

**COUNCIL SUBMISSION  
EXHIBITION OF AMENDED STATE SIGNIFICANT DEVELOPMENT APPLICATION – WSU  
INDIGENOUS CENTRE OF EXCELLENCE (171 VICTORIA ROAD, PARRAMATTA)**

I refer to the above application and the request to provide advice on the proponent's amended Environmental Impact Statement. Council remains committed to centring First nations aspirations and voices within the city and is still supportive of the proposal. However, certain issues raised in Council's initial submission have not been addressed and warrant further consideration.

**Flooding**

The site is surrounded by high hazard floodwaters in a 'Probable Maximum Flood' event. In these cases, advice from DCCEEW and SES, is that it is not suitable for people to Shelter in Place ('SIP'). Evacuation is not possible under these circumstances and so the situation becomes unresolvable.

Parramatta DCP 2023 permits Shelter in Place when evacuation by road is not possible or too risky. Council does not object to the SIP proposal, provided it complies with the Parramatta DCP 2023 required duration of stay which is 72 hours – recognising the likelihood that flooding will possibly be a multi-day, multi-storm event. It is acknowledged that this is different from the DPHI guidelines which stipulate a maximum of 12 hours duration of stay in the SIP but is considered to be a reasonable request given the level of hazard.

Council does not support a two-stage emergency response whereby horizontal evacuation is permitted in the earlier part of a flood and then SIP must be adopted as flooding increases. This is considered to offer too much risk and dependency on human and electromechanical systems that can fail and pose a risk to life. In such circumstances SIP only can be used.

Additionally, the submitted amended Flood Modelling requires more detail, which has been highlighted in the Attachment 1 below.

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## **Stormwater and Water Sensitive Design**

The revised proposal retains a 1200 mm diameter Council pipe beneath the building, with two new inspection pits. This is not supported. Council pipes must be relocated outside the building footprint, with an adequate easement that is open to the sky, as per Council's Development Engineering Design Guideline 2018, section 4.5. The easement must be wide enough to allow a safe overland flow path for up to the 1% AEP event, considering climate change.

This requirement ensures long-term access for maintenance, reduces risk to the building, and maintains compliance with Council and industry standards.

As mentioned in previous comments, a map clearly showing proposed and existing public and private stormwater/flooding assets need to be included. It should also show the owner (current/future) of the assets.

## **Urban Design**

The proposed design has shown a great effort to achieve different aspects of Connecting with Country for the Indigenous Centre of Excellence. Council is supportive of the overall design of the building, however, these previous comments have not been adequately addressed:

- While the main pedestrian flow may be from the southwest and northeast, the Victoria Road frontage remains a key public interface for the site. Providing clear entry points and activating the façade, particularly at lower levels (similar to the glazed lower levels on the inner façade of the building), can help create a more engaging and welcoming streetscape for pedestrians along this arterial road.

This approach would complement the building's proposed orientation to the campus and creek, while strengthening its connection to the local public context.

- Further design consideration is still recommended to reduce the building's perceived bulk and scale through modulation and articulation, while maintaining the intended continuity through the use of a singular material.
- A more refined signage zone that occupies less of the façade is recommended to ensure the material and architectural expression remain prominent.

## **Landscaping**

The overall landscape design of the ground level communal open spaces is supported by Council. Additional information is required for the podium terraces (L2 & L3). Tree Protection Plans are required for the existing trees to ensure they are adequately retained and protected.

Recommended Landscape conditions of consent that are considered to address these matters are provided in Attachment 2 to this letter for the applicant and the Department to review.

## **Traffic and Transport**

The recommended Traffic conditions of consent provided in the initial Council response continue to be relevant and are replicated in Attachment 3 to this letter for the applicant and the Department to review.

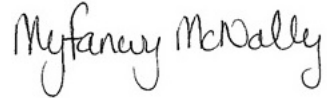
## **Conclusion**

It is noted that this is the recommendation of Council officers.

Council appreciates the opportunity to comment on the above application and acknowledge the positive impact that the proposal will have on local and regional communities. Council looks forward to continued collaboration.

Should you wish to discuss the above matters, please contact Darren Wan (Executive Development Assessment Officer) on the details listed above.

Yours sincerely

A handwritten signature in black ink that reads "Myfanwy McNally". The script is cursive and fluid, with the first name "Myfanwy" being more prominent than the surname "McNally".

Myfanwy McNally

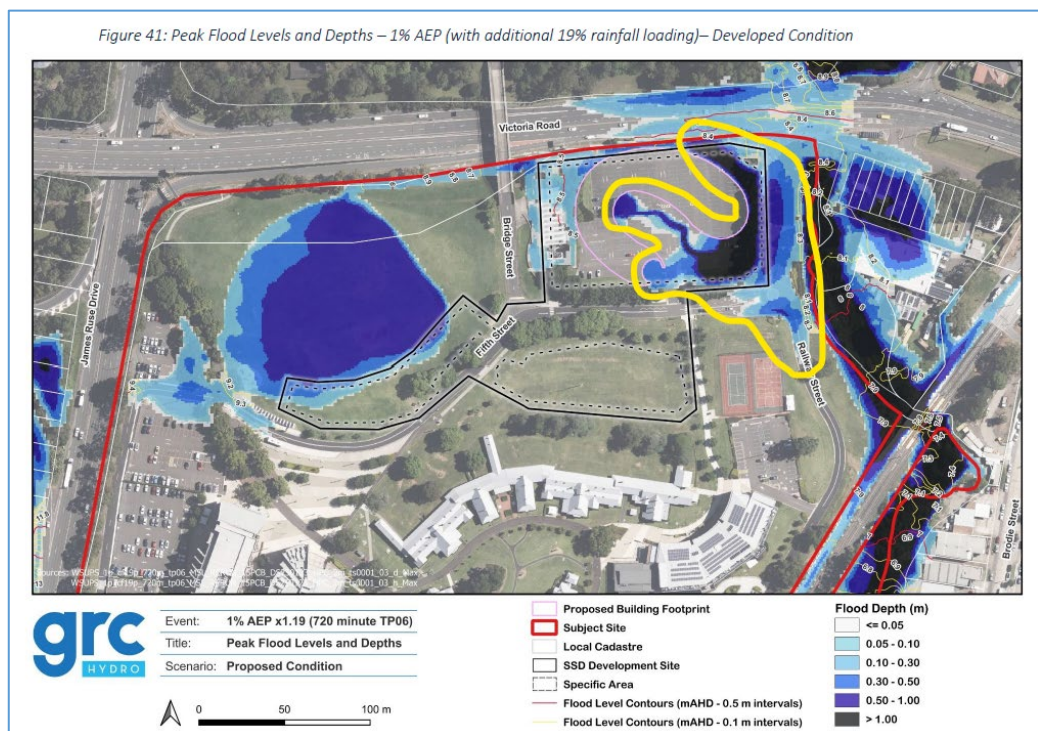
**MANAGER, CITY SIGNIFICANT DEVELOPMENT**

## Attachment 1 – Flood Modelling Requirements

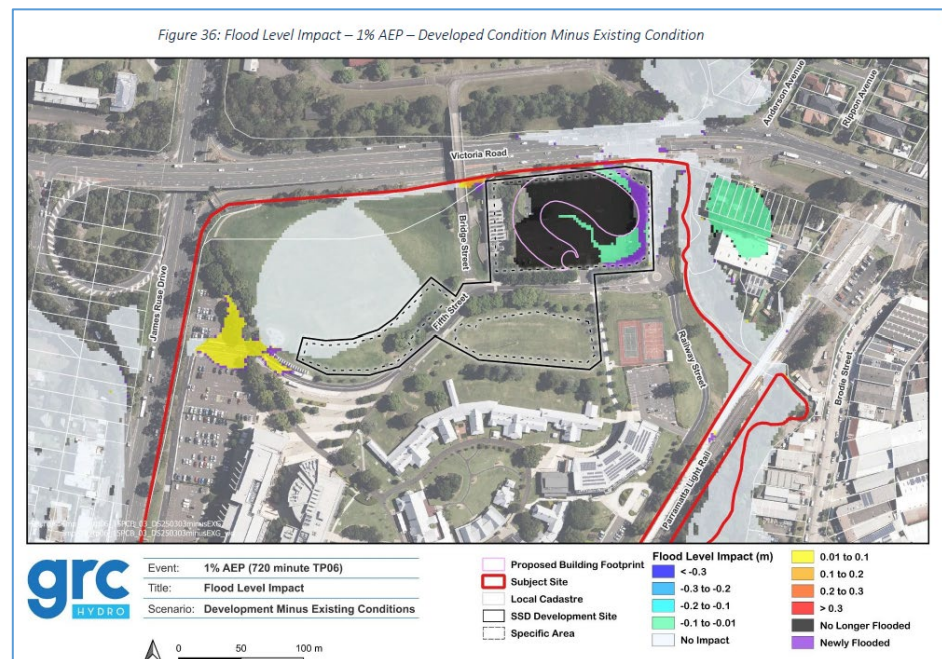
- i. **Rainfall Intensity and Temporal Pattern :** The 19% increase in rainfall intensity (with the highest temporal pattern) appears to have only been used in sensitivity analysis.

This increment and temporal pattern should be included in the base case/design case for all design, flood impact assessment, and flood planning level calculations, as this allowance is for Flood Frequency Analysis calibration and is adopted.

- ii. **Hydraulic Consistency:** Confirm that upstream flows at Victoria Road bridge match the adopted Parramatta River Flood Study.
- iii. **Flood Storage:** Any loss of flood storage (up to 1%FFA AEP, adjusted for the 19% rainfall increment) must be compensated. Provide cross-sections and volume calculations to demonstrate compliance.
- iv. **Flood Depths:** The post-development scenario shows flood depths >1m (highlighted in yellow). Explain how this will be managed. If this area is a detention basin, provide design and safety details and confirm if it triggers Dam Safety NSW requirements.



- v. **Safety:** Consider fencing and other safety measures where required.
- vi. **Overland Flow:** Design and incorporate a safe overland flow path from the oval.
- vii. **Flood Impact Assessment:**



- Clarify if the assessment includes the 1%AEP + 19% rainfall increment with highest TP.
- Removing flood storage is unlikely to have no impact—provide evidence.
- Address the cause of the 10–100 mm flood afflux on the western side; ensure no worsening of existing flooding.

viii. **Flow leaving the subject site:**

Provide a table with comparison of Pre-Development and Post Development Flows (Pipe Flow, Overland Flow and combined pipe & overland flow) leaving the site at each of the locations. Discharge should be less than pre-development flows.

Updated electronic copy of the models need to be submitted along with the results for review with incorporation of all of our comments.

### Before the Issue of a Construction Certificate

The final Landscape Plan must be consistent with plans prepared by Jane Irwin Landscape Architecture, numbered 240101, rev 2 dated 28/02/2025 and the following requirements:

- a. The location of all proposed underground services to be shown and coordinated with all relevant plans.
- b. Existing trees shall be numbered as per the Arboricultural Impact Assessment Report by Tree Survey dated 09.07.2024 and are to include the TPZ and SRZ radiuses for coordination.
- c. All trees must be planted with a minimum setback of 3.5m to the outside wall or edge of a legally constructed building or the proposed development and a minimum 2m distance from any proposed or existing drainage line to avoid any potential future infrastructure conflict.
- d. Delete all proposed planting within the Structural Root Zone (SRZ) of the trees to be retained and protected to avoid severing the roots.
- e. Delete any proposed edging within the Structural Root Zone (SRZ) of the trees to be retained to avoid severing the roots.
- f. Delete the proposed tree planting in front of the Western Sydney University signage at the corner Victoria Rd and Railway St and to improve visibility.
- g. All proposed softscape details to be provided.
- h. Details for all proposed hardscape structures to be provided.
- i. Trees should be self-supporting from the nursery.
- j. Tree planting details must show compacted sub grade area under the root balls to mitigate against subsidence.
- k. Provide a Planting Plan for the podium roof terrace planters (Level 2 terraces & Level 3 Astronomy Garden)
- l. Update the proposed plant schedule including the size of the containers at planting. Trees are to be a minimum 100L.
- m. Delete the tree species from all landscape mixes to avoid future maintenance conflict and infrastructure issues.
- n. A landscape maintenance schedule is required for all the different landscaped areas and landscaped types (hard and soft) to ensure all landscape areas are well maintained for a sufficient period (minimum 1 year)
- o. A soil specification ('Fit-for-purpose' performance description) for imported soil types to ensure sufficient nutrient and water availability is achieved.
- p. Provide a typical detail showing the shrub planting within the Tree Protection Zone (TPZ) of existing trees to ensure there will be minimal to no excavation, cultivation and compaction and to ensure the root system will be adequately retained and protected.
- q. All non-destructive construction details within the TPZ of the trees to be retained and protected are to be prepared in conjunction with the Project arborist to ensure the trees will be adequately protected during the works.

**Reason:** To ensure the consistency between architectural/civil/landscape plans.

Landscape Plans and documents submitted must include the following changes with an application for a Construction Certificate:

- a) Construction details are to be provided by a suitably qualified Structural Engineer showing substrate depth, drainage, waterproofing for all planting on structures, including planting over on-site detention tanks, raised planters and rooftop gardens.
- b) Soil volume and depth on structure must meet the following prescribed
  - Typical shrub planting on structure detail to show minimum 500-600mm soil depth,



- Typical turf planting on structure to show minimum 200-300mm soil depth.
- c) Sections through the planters on level 2 and level 3 supporting the shrubs and groundcovers podium level are required to show the above requirements.
- d) An Irrigation plan and specification must be provided by a suitably qualified Hydraulic Engineer.

**Reason:** To ensure the creation of functional gardens.

A Tree Protection Plan (TPP), prepared by a suitably qualified Consulting Arborist (Australian Qualification Framework Level 5), must accompany the application for a Construction Certificate. This TPP is to identify the specific tree protection measures to be implemented for the trees located within the site during demolition and construction and the expected future health of the trees. It will cover all stages of the works and any works to be supervised by the Project Arborist including:

- (a) A Tree Protection Plan must follow the tree numbers already identified in the existing Arboricultural Impact Assessment by Tree Survey.  
Note: Tree numbers that have been duplicated across the main Indigenous Centre for Excellence site and the Car Park P1 site are to be re-numbered to avoid any confusion during the demolition and construction periods.
- (b) The TPP must identify the location and the specific tree protection type required for each tree inclusive of canopy, trunk and tree root protection in accordance with AS 4970-2025 - *Protection of Trees on Development Sites*.
  - (a) Discuss supervision of any approved excavation and/or works to be undertaken within the calculated Tree Protection Zones of the trees to be retained and protected.
  - (b) It must discuss the specific non-destructive construction method of approved works within the TPZ's of trees to minimise the impact and encroachment and discuss the specific protection measures required throughout the demolition and construction works.
  - (c) Provide guidance on the approved services to be installed within the TPZ of trees, to ensure non-destructive construction techniques are used to minimise the construction impact (i.e. bridging of roots);
  - (d) Provide guidance on the approved landscaping (i.e. minimise cultivation, excavation planting techniques within the TPZ. No planting or structures to occur within the SRZ);
  - (e) Construction of any structure which requires a modified footing or that is to be built above grade;
    - Where works are to impact the tree canopies, a tree pruning diagram will be required to ensure the level of encroachment into the canopies will be minimised.
  - (f) Identify hold points at key stages in the construction works, specific to this project;
  - (g) Regular Periodic Tree Inspections are required to be carried out by the Project Arborist supervising the works. Photographic evidence and statement demonstrating the works have been undertaken in compliance with the above requirements, AS4970:2025 and the Conditions of Consent.

**Reason:** To ensure adequate protection of existing trees.

### **Before the Issue of a Construction Certificate**

Prior to issue of the relevant Construction Certificate, the P1 Replacement Car Park is to be operational and provide a minimum of 284 parking spaces as detailed in the Traffic Impact Assessment by Taylor Thomson and Whitting dated 26 July 2024.

**Reason:** To comply with Council's parking requirements and to protect the amenity of the surrounding residential and business areas.

The PCA shall ascertain that any new element in the carpark not illustrated on the approved plans such as columns, garage doors, fire safety measures and the like do not compromise appropriate manoeuvring and that compliance is maintained with AS 2890.1, AS2890.2 and AS 2890.6. Details are to be illustrated on plans submitted with the construction certificate application.

**Reason:** To ensure appropriate vehicular manoeuvring is provided

28 bicycle spaces/racks are to be provided on-site and used accordingly for the Indigenous Centre of Excellence. The bicycle storage/racks are to comply with AS2890.3-2015. Details are to be illustrated on plans submitted with the construction certificate.

**Reason:** To comply with Council's parking requirements.

### **While Building Work is being carried out**

Occupation of any part of the footpath or road at or above (carrying out work, storage of building materials and the like) during construction of the development shall require a Road Occupancy Permit from Council. The applicant is to be required to submit an application for a Road Occupancy Permit through Council's Traffic and Transport Services, prior to carrying out the construction/restoration works.

**Reason:** To ensure proper management of Council assets.

Oversize vehicles using local roads require approval from the National Heavy Vehicle Regulator (NHVR). The applicant is to be required to submit an application for an Oversize Vehicle Access Permit through NHVR's portal ([www.nhvr.gov.au/about-us/nhvr-portal](http://www.nhvr.gov.au/about-us/nhvr-portal)), prior to driving through local roads within the City of Parramatta LGA.

**Reason:** To ensure maintenance of Council's assets.

### **Prior to Occupation**

Prior to the issue of the relevant occupation certificate, the pedestrian link as required by DA/346/2022 is to be completed and made operational.

**Reason:** To promote sustainable transport practices.