



Response to Submissions for the Amended Proposal

Western Sydney University Indigenous Centre of Excellence

Western Sydney University
Parramatta South Campus
171 Victoria Road, Parramatta

Submitted to the Department of Planning, Housing and Infrastructure
On behalf of Western Sydney University

SSD-64916225



'Gura Bulga'

Liz Belanjee Cameron

'Gura Bulga' – translates to Warm Green Country. Representing New South Wales.



'Dagura Buumarri'

Liz Belanjee Cameron

'Dagura Buumarri' – translates to Cold Brown Country. Representing Victoria.



'Gadalung Djarri'

Liz Belanjee Cameron

'Gadalung Djarri' – translates to Hot Red Country. Representing Queensland.

Colliers Urban Planning acknowledges the Traditional Custodians of Country throughout Australia and recognises their continuing connection to land, waters and culture.

We pay our respects to their Elders past and present.

In supporting the Uluru Statement from the Heart, we walk with Aboriginal and Torres Strait Islander people in a movement of the Australian people for a better future.

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Attachments

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A. Submissions Register	Colliers Urban Planning
B. Updated Mitigation Measures	Colliers Urban Planning
C. Architectural Drawings (Clean)	JCBA
D. Architectural Drawings (Clouded)	JCBA
E. Architectural Statement of Changes	JCBA
F. Design Report	JCBA
G. Landscaping Drawings (Clean)	Jane Irwin Landscape Architecture
H. Landscaping Drawings (Clouded)	Jane Irwin Landscape Architecture
I. Civil Drawings	TTW
J. Stormwater SSD Report	TTW
K. Flood Impact Risk Assessment	GRC Hydro
L. Structural Integrity During a PMF Event	TTW
M. Transport and Accessibility Impact Assessment	TTW
N. Green Travel Plan	TTW
O. Construction Traffic Management Plan	TTW
P. Response to Submissions – Heritage	Curio
Q. Historical Archaeological Assessment	Curio
R. Aboriginal Cultural Heritage Assessment Report	Curio
S. Heritage Impact Statement	Curio
T. BCA Report	BM+G
U. Acoustic Concept Design Report	PWNA
V. Access Design Review	Jensen Hughes
W. Net Zero Statement	Steensen Varming
X. Report on Additional Geotechnical Investigation	Douglas Partners
Y. Remediation Action Plan	Douglas Partners
Z. Fire Safety Engineering Design Review	Scientific Fire Services
AA. Visual Impact Assessment	Colliers Urban Planning
BB. Visual Impact Photomontage and Methodology Report	Virtual Ideas
CC. Qualitative Wind Assessment	CPP Wind Engineering Consultants
DD. Environmental Sustainability Report	Flux Consultants
EE. Social Impact Assessment	GYDE
FF. Construction & Demolition Waste Management Plan	Elephants Foot Consulting
GG. Operational Waste Management Plan	Elephants Foot Consulting

HH. Lighting and Electrical Drawings & Specifications	<i>Steensen Varming</i>
II. Turf Cell Maintenance Strategy	<i>TTW</i>
JJ. Temporary Car Park Strategy	<i>Western Sydney University</i>
KK. Car Park Subsurface Utility Report	<i>Qasar Subsurface Utility Consultants</i>
LL. Groundwater impact assessment - response to submissions	<i>Douglas Partners</i>
MM. WSU Indigenous Centre of Excellence COPC Stormwater Asset	<i>WSU</i>
NN. Design Integrity Panel Advice	<i>CityLab</i>
OO. Biodiversity Development Assessment Report	<i>Land Eco Consulting</i>
PP. Pipeline Hazard Analysis	<i>Sherpa Consulting</i>

Executive Summary

This Submissions and Amendment Report has been prepared by Colliers Urban Planning on behalf of Western Sydney University (WSU) (the Applicant) for the Indigenous Centre of Excellence State Significant Development Application (SSDA) (SSD-64916225) located on Darug land at Western Sydney University Parramatta South Campus, 171 Victoria Road, Parramatta (the site).

The SSDA was first lodged with the NSW Department of Planning, Housing, and Infrastructure (DPHI) in August 2024, seeking development consent for the construction of a new four (4) storey tertiary educational facility to accommodate the new Indigenous Centre of Excellence (ICoE). The SSDA was publicly exhibited by the DPHI from 20 August 2024 until 26 September 2024, with the subsequent request for Response to Submissions (RTS) issued on 1 October 2024. Following the public exhibition, further engagement with relevant authorities was undertaken. Further additional matters were raised by DPHI on 16 July 2025 and by Heritage NSW on 28 July 2025. In response, design amendments and a revised project scope occurred. This amended project scope included the introduction of a temporary car park to accommodate 288 car parking spaces. To formalise the design amendments and ensure all matters raised within the agency advice and submissions were addressed, an Amendment Report and supporting documentation was submitted on 27 August 2025. The amended application was exhibited from 24 September to 7 October 2025.

Following public exhibition of the amended proposal, DPHI provided written correspondence on 13 October 2025, outlining all agency responses had been received with responses from Crown Lands and the Conservation Programs, Heritage and Regulation branch of the NSW Department of Climate Change, Energy, Environment and Water to follow at a later date.

Following the formal written correspondence from DPHI, ongoing liaison occurred with DPHI and the relevant agencies to respond to the site constraints and matters relayed within the submissions received. The current proposal has therefore been further amended, and results in a three (3) storey building. In the context of the wider SSDA, it is considered that the suite of changes proposed to the new building are relatively minor and in keeping with the design integrity of the original proposal.

Overview of Agency Advice

In relation to the Public Exhibition of the SSDA, agency advice was received from the following:

- Department of Planning, Housing and Infrastructure (DPHI)
- Department of Climate Change, Energy, the Environment and Water (Conservation Programs, Heritage and Regulation, Water Assessments and Heritage NSW)
- Crown Lands
- NSW SES
- Transport for NSW.

Overview of Submissions

In addition, one (1) submission was received during the Public Exhibition of the SSDA from City of Parramatta Council (Council).

Collectively, the agency advice and submission made, related to a range of matters including:

- Urban Design
- Hazards and risk related to flood impacts
- Heritage
- Water Management
- Water Supply
- Mitigation Measures.

Actions taken since Exhibition

Following the Public Exhibition of the SSDA, the Applicant has undertaken further engagement with the key relevant authorities including:

- DPHI
 - 6 November 2025: Discussion on Response to Submissions letter dated 13 October 2025 and project direction

- DPHI, City of Parramatta, Department of Climate Change, Energy, the Environment and Water (Conservation Programs, Heritage and Regulation and Water Assessments)
 - 27 November 2025: Discussion on the amended Flood Impact Assessment and Flood Emergency Response Plan prepared in response to matters raised by agencies and Council.
- DPHI, NSW SES, City of Parramatta, Department of Climate Change, Energy, the Environment and Water (Conservation Programs, Heritage and Regulation and Water Assessments)
 - 2 December 2025: Discussion on the amended Flood Impact Assessment and Flood Emergency Response Plan prepared in response to matters raised by agencies and Council.

Project Amendments

The proposed design changes have largely been made in response to the received agency advice and Council submission during the exhibition period to address all matters raised. These design changes include the reduction of the building footprint, deletion of the fourth floor and internal reconfiguration of space to respond to the reduced building envelope.

In the context of the wider SSDA, it is considered that the suite of changes proposed to the new building are relatively minor and in keeping with the design integrity of the previous design iterations. The proposed changes to the building have been reviewed by the Design Integrity Panel established during the previous Design Excellence process undertaken prior to the preparation of this amended SSDA.

Further Assessment and Mitigation Measures

Further assessment of the amended proposed development has been undertaken by the expert project team as required. **Section 6.0** of this report provides an assessment of the revised proposal and generally concludes the following:

- The amended proposal does not result in additional downstream or upstream catchment impacts.
- The deletion of the fourth storey and overall design amendments to the facade has responded to the design considerations provided and provides a positive outcome.
- The revised proposal is supported from a visual impact assessment perspective and has been assessed against the relevant principles of *Rose Bay Marina Pty Limited v Woollahra Municipal Council and anor [2013] NSWLEC 1046*.

Revised and addendum technical studies have been prepared where required to respond to matters raised in submissions and/or provide further assessment taking into account the proposed changes to the exhibited project. Where required, this assessment has informed updates to the project Mitigation Measures (included at **Attachment B**).

Conclusion

This Response to Submissions for the Amended Proposal outlines the design changes and amendments that have been made following exhibition of the amended SSDA and in response to the submissions received. The design amendments have demonstrated that they would not impose any additional environmental impacts that cannot be appropriately managed or mitigated. The amended development remains consistent with the objectives of the exhibited development and is consistent with the project justification, including suitability of the site and the public interest.

1.0 Introduction

This Submissions and Amendment Report has been prepared by Colliers Urban Planning on behalf of Western Sydney University (WSU) (the Applicant) for the Indigenous Centre of Excellence State Significant Development Application (SSDA) (SSD-64916225) located on Darug land at Western Sydney University Parramatta South Campus, 171 Victoria Road, Parramatta (the site).

The SSDA was first lodged with the NSW Department of Planning, Housing, and Infrastructure (DPHI) in August 2024. The SSDA sought development consent for the construction of a new four (4) storey tertiary educational facility comprising 5,543.3m² of Gross Floor Area (GFA) to accommodate the new Indigenous Centre of Excellence (ICoE). The SSDA was publicly exhibited by the DPHI from 20 August 2024 until 26 September 2024, with the subsequent request for response to submissions issued on 1 October 2024. Following the public exhibition, further engagement with the following relevant authorities was undertaken:

- Engagement with Indigenous Communities
 - 29 August 2024: Community Engagement
 - 17 October 2024: Community Engagement
 - 29 November 2024: Elders Advisory Committee
 - 1 January 2025: Community Engagement
 - 7 March 2025: Elder's Advisory Committee Meeting
- City of Parramatta
 - 28 October 2024: Flooding Meeting
 - 11 December 2024: Flooding Meeting
- Heritage NSW and DPHI
 - 29 October 2024: Site Inspection with DPHI
 - 28 January 2025: Site Inspection with Heritage NSW
 - 18 February 2025: Car park scope meeting with Heritage NSW
 - 9 April 2025: Car park scope meeting with Heritage NSW
 - 12 May 2025: Revised SSD scope meeting with Heritage NSW and DPHI
 - 4 June 2025: Amendment Report discussion with DPHI
- Design Excellence Consultation
 - 28 January 2025: Design Integrity Panel Meeting

Further, additional matters were raised by DPHI on 16 July 2025 and by Heritage NSW on 28 July 2025.

In response to the above, design amendments, and as a consequence of ongoing design development and a revised project scope occurred. This amended project scope included the introduction of a temporary car park to accommodate 288 car parking spaces. To formalise the design amendments and ensure all matters raised within the agency advice and submissions were addressed, an Amendment Report and supporting documentation was submitted on 27 August 2025. The amended application was exhibited from 24 September to 7 October 2025.

Following public exhibition of the amended proposal, DPHI provided written correspondence on 13 October 2025, outlining all agency responses had been received, with responses from Crown Lands and the Conservation Programs, Heritage and Regulation branch of the NSW Department of Climate Change, Energy, Environment and Water to follow at a later date.

Following the formal written correspondence from DPHI, ongoing liaison occurred with DPHI and the relevant agencies to respond to the site constraints and matters relayed within the submissions received.

A Response to Submissions was formally provided on 12 December 2025 however, a further request for additional information was issued by DPHI on 16 December 2025, requesting the Design Integrity Panel comments be included within this report along with a revised Biodiversity Development Assessment Report.

The current proposal has therefore been further amended, and results in a three (3) storey building, accommodating a site area of approximately 20,035m². In the context of the wider SSD, it is considered that the

suite of changes proposed to the new building are relatively minor and in keeping with the design integrity of the original proposal.

Accordingly, this Submissions and Amendment Report provides an analysis of submissions, actions taken since the most recent public exhibition during 24 September to 7 October 2025, the Applicant's response to submissions and provides an updated justification of the proposed development. It is accompanied by supporting information and technical reports (refer to the **Table of Contents**).

This Submissions and Amendment Report, as required under section 59(2) and section 37(6) 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* and *Appendix D - Preparing and Amendment Report*.

2.0 Analysis of Submissions & Agency Advice

This section analyses the agency advice and submission received, by providing a breakdown of the type of submission and identifies the issues raised.

2.1 Breakdown of Submissions and Agency Advice

The SSDA was most recently exhibited from 24 September to 7 October 2025. In response, agency advice was received from a variety of authorities/organisations, which is summarised within **Table 1** below.

Table 1 Summary of Agency Advice and Submission Received

Agency Advice received	
Department of Planning, Housing and Infrastructure (DPHI)	Comments for consideration.
Department of Climate Change, Energy the Environment and Water – Water Assessments	Comments for consideration.
Department of Climate Change, Energy the Environment and Water – Heritage NSW (as delegate under <i>National Parks and Wildlife Act 1974</i>) (Heritage NSW)	Comments for consideration.
Department of Climate Change, Energy the Environment and Water – Heritage NSW (as delegate of the Heritage Council of NSW) (Heritage NSW)	Comments for consideration.
Department of Climate Change, Energy the Environment and Water – Conservation Programs, Heritage and Regulation (DCCEEW CPHR)	Comments for consideration.
Crown Lands	Comments for consideration.
NSW State Emergency Service (SES)	Comments for consideration.
Transport for NSW	Comments provided, no additional information required.
Submission received	
City of Parramatta (COP)	Comments for consideration.

2.2 Categorising of Issues

A categorical summary of the issues raised in the submissions received is provided in **Table 2** below.

Table 2 Summary of Issued Raised

Category	Issue	Stakeholder
The Project	Built form - Lack of activation to Victoria Road - Reduction in the scale of the building	- City of Parramatta - DPHI
	Signage Zones Extent/scale of signage zones	- City of Parramatta - DPHI
	Landscaping Details on the podium terraces	City of Parramatta
	Heritage - Temporary nature of car park works - Impacts on the character of the SHR item	Heritage NSW

Economic, environmental and social impacts	Flooding • Model accuracy and detail • Consideration of the impacts from the 5% AEP and Probable Maximum Flood (PMF) • Risk assessment for high hazard flood events and flow on effects of long duration flooding • Shelter in place considerations • Revised Flood Emergency Response Plan • Revised Flood Impact Risk Assessment (FIRA) • Effective flood warning strategy • Climate change	• City of Parramatta • DPHI • CPHR • NSW SES
	Stormwater Management • Impact on Council's existing infrastructure • Groundwater	• City of Parramatta • NSW Department of Climate Change, Energy the Environment and Water – Water Assessments
	Heritage • Update to the ACHAR • Car park heritage assessment and impacts • Remediation of carparks and borrow pits	• Heritage NSW
Procedural matters	Land Ownership / Landowners Consent • Crown land consent required	• DPHI
	Aboriginal Community Consultation • Additional documentation and receipt of consultation undertaken	• Heritage NSW
	Mitigation Measures • Provide a consolidated mitigations table that can be read as a standalone document	• DPHI
	Conditions of Consent • Landscape recommendations • Tree protection plan • Traffic and transport recommendations	• City of Parramatta

3.0 Actions taken since Exhibition

Since lodgement of the EIS and subsequent amended SSDA, additional environmental assessment and stakeholder engagement has been undertaken as outlined throughout this section.

3.1 Further Engagement Undertaken

Following the Public Exhibition of the amended SSDA, the Applicant has undertaken further engagement with the key relevant authorities, as described in **Table 3** below.

Table 3 Summary of Further Engagement Undertaken

Stakeholder	Engagement Undertaken
Department of Planning, Housing and Infrastructure	On 6 November 2025, a meeting was held between the Applicant and DPHI to discuss the Response to Submissions letter (RTS letter) dated 13 October 2025 and direction and deliverables of the SSDA moving forward.
Department of Planning, Housing and Infrastructure and City of Parramatta Council	- On 27 November 2025, a meeting was held between the Applicant and GRC Hydro, the City of Parramatta Council Officers, DPHI, NSW Department of Climate Change, Energy, the Environment and Water in relation to the amended Flood Impact Assessment and Flood Emergency Response Plan prepared in response to matters raised by agencies. - On 2 December 2025, an additional meeting was held between the Applicant and GRC Hydro, the City of Parramatta Council Officers, DPHI, New South Wales State Emergency Service (SES), NSW Department of Climate Change, Energy, the Environment and Water in relation to the amended Flood Impact Assessment and Flood Emergency Response Plan prepared in response to matters raised by agencies.
Design Integrity Panel	- On 13 October 2025, DPHI requested within the RTS letter that a meeting with the DIP should be held to discuss the amended proposal. - A further design integrity panel was held on 15 December 2025 which concluded the Panel considers the evolution of the building and landscape design is both positive and aligned with the project's ambitions and does not impact on the design integrity of the project.

3.2 Project Refinements

In response to the matters raised in the submissions, and as a consequence of ongoing design development, the Applicant has refined the project for which consent is sought as described in **Section 4.0**.

3.3 Further Assessment

In response to matters raised in the submissions, and as a consequence of the project amendments described in **Section 4.0**, the Applicant has undertaken further environmental assessment of the project as outlined in **Sections 6.0** and **7.0**.

4.0 Description of Project Amendments

This section sets out the amendments made to the project since public exhibition of the EIS and amended SSDA, which have been made as a result of ongoing design development and project refinement, and in response to matters raised in submissions.

4.1 Project Amendments Since Exhibition

Pursuant to section 37 of the *Environmental Planning and Assessment Regulation 2021*, an applicant may, at any time before a development application is determined, apply to the consent authority for an amendment to a development application. In order to respond to matters raised in this the submissions received, as well as a result of ongoing design development, a number of amendments to the project are proposed.

Accordingly, the amended proposal seeks to slightly reduce the overall scale of the built form by decreasing the building footprint and deleting the fourth storey of the building. As a result, the internal configuration has been amended accordingly and development consent is sought for a three-storey tertiary educational facility to accommodate the new ICoE, comprising a GFA of 5,267.1m².

The proposed modifications to the development are described below in **Table 4**.

Table 4 Summary of Design Changes

Design Change	Explanation
Architectural amendments – design and development	
Internal layout amendments	Internal layout of the ICoE building has been updated to reflect ongoing design and development changes. Key amendments include: - Reduction in the building floorplate, providing greater setbacks to the Melaleuca tree, Victoria Road and Railway Street - Deletion of the fourth storey including the multipurpose court and retractable netting system - Reduced floor to floor heights - Reduced parapet heights - Single roof plane and springing. Deletion of the following internal and external spaces: - Rehearsal space, green room and speaker room on the ground floor - Outdoor multi-function court which has been relocated internally - BBQ area and outdoor maker courtyard - Care space and discovery space on the ground floor - Storytelling spaces on Level 1 - Indigenous astronomy garden located on the rooftop.
Façade	The overall façade of the building has been refined to amend the total number of façade modules and rationalise and reduce the number of clay tiles utilised.
Landscape amendments	
Revised ground floor landscape design	The landscape design is also proposed to change slightly to respond to the site's flood affection, ensuring entry points into the building meet the flood planning levels that apply to the site. Overall, the deep soil area provided upon the site has increased, which has had a net positive benefit, resulting in reduced flood storage from the originally proposed SSDA.

4.2 Revised Proposal Overview

The proposal seeks consent under Division 4.7 of the EP&A Act for the construction and operation of a three-storey Indigenous Centre of Excellence and associated car parking at the Western Sydney University Parramatta South Campus.

As a consequence of the project changes outlined in **Section 4.1**, the key project information has been updated and shown in ***bold italics***, as outlined in **Table 5**.

Table 5 *Updated Key Project Details*

Component	As Exhibited	Post-Exhibition
Project Summary	Removal of existing P1 car parking and vegetation and construction and operation of a four-storey Indigenous Centre of Excellence and associated car parking at Western Sydney University Parramatta South Campus.	Removal of existing P1 car parking and vegetation and construction and operation of a three-storey Indigenous Centre of Excellence and associated car parking at Western Sydney University Parramatta South Campus.
Proposed Land Use	No change.	No change.
Legal Description	Within part Lot 100 and part Lot 101 in DP816829.	Within part Lot 100 and part Lot 101 in DP816829. No change.
Project Site Area	20,035m ² comprising: 12,132m² (ICoE Site Area) 4,716m² (Eastern Car Park) 3,187m² (Western Car Park)	20,035m ² comprising: 12,132m² (ICoE Site Area) 4,716m² (Eastern Car Park) 3,187m² (Western Car Park) No change.
GFA	5,775m ²	5,267.1m²
FSR	0.47:1 (car park excluded from site area calculation) 0.28:1 (car park included as part of site area calculation)	0.43:1 (car park excluded from site area calculation) 0.26:1 (car park included as part of site area calculation)
Maximum Height	RL29.62	RL24.996 (fourth floor deleted along with net enclosure)
Car spaces	13 car parking spaces within ICoE curtilage including 1 accessible parking space. 288 replacement P1 car parking spaces including 1 accessible parking space.	13 car parking spaces within ICoE curtilage including 1 accessible parking space. 288 replacement P1 car parking spaces including 1 accessible parking space. No change.
Bicycle Spaces	28 external bicycle racks. (no change).	28 external bicycle racks. (no change).
Vehicular Access	Vehicular access will be provided by three (3) new single vehicular cross-over accessed from Fifth Street.	Vehicular access will be provided by three (3) new single vehicular cross-over accessed from Fifth Street. No change.
Boundary Setbacks	- Northern: 2.83m - Eastern: 8.16m - Southern: 13.2m - Western: 33.76m - Western from Central Energy Plant: 4.78m	- Northern: 3.65m - Eastern: 10.84m - Southern: 18.1m - Western: 34.87m - Western from Central Energy Plant: 5.37m
Landscaped Area	7,555m ² (62%)	6,912m² (56%)
Deep Soil Zone	6,035m ²	6,295m²
Canopy Cover	44%	44% (no change).
Tree Removal	55	55
Construction Jobs	340 full-time-equivalent. no change, increased works staged sequential.	340 full-time-equivalent (no change, increased works staged sequential).

Component	As Exhibited	Post-Exhibition
Operational Jobs	150 (full time employment). No change.	150 (full time employment). No change.
Construction Staging	Multiple stages are required to facilitate the construction of the new eastern and western car parks prior to the demolition of the existing P1 car park.	Multiple stages are required to facilitate the construction of the new eastern and western car parks prior to the demolition of the existing P1 car park. No change.
Construction Timing	Construction anticipated to commence Q4 2025 and scheduled to be completed and operational by late 2026.	Construction anticipated to commence Q2 2026 and scheduled to be completed and operational by early 2028 .
Estimated Development Cost	Approximately \$88 million (excluding GST).	Approximately \$88 million (excluding GST). No change.

4.3 Revised Project Description

This Submissions and Amendment Report proposes the following revised Project Description, which can be summarised as a reduction in the scale of the building footprint and deletion of one (1) storey (amendments shown in **bold, strike-through**). Given the proposal includes the deletion of the fourth storey, the internal configuration has been slightly amended across all floors and for ease, the aspects of each level have been **bolded** below.

- Construction of a **four (4) three (3)** storey Indigenous Centre of Excellence encompassing:
 - **Ground level facilities, including but not limited to; a dedicated arrival area, outdoor amphitheatre, multipurpose court and theatre, and gallery. Associated workspaces, teaching spaces, meeting areas, lounge areas and other amenities are to be provided throughout the ground floor.**
 - **First floor level comprising meeting space and dedicated educational facilities including learning areas and teaching spaces.**
 - **Second floor level comprising offices, and collaboration spaces.**
 - Roof level plant and services.
 - Building identification signage zones.
- Construction of internal driveway and car parking areas, including:
 - 13 with hardstand area spaces adjacent to the new dedicated arrival zone for the proposed ICoE development
 - **107** temporary replacement P1 spaces proposed in new western car park to the west of Bridge Street, adjacent to the existing oval
 - 181 temporary replacement P1 spaces proposed in new eastern car park on the southern side of Fifth Street
 - Associated land remediation, civil and electrical works.
- Landscaping works to provide outdoor educational and recreational spaces.

4.4 Building Massing

The amended SSDA results in an overall reduction in the building footprint and massing which is illustrated within Figure 1 – Figure 5 below.

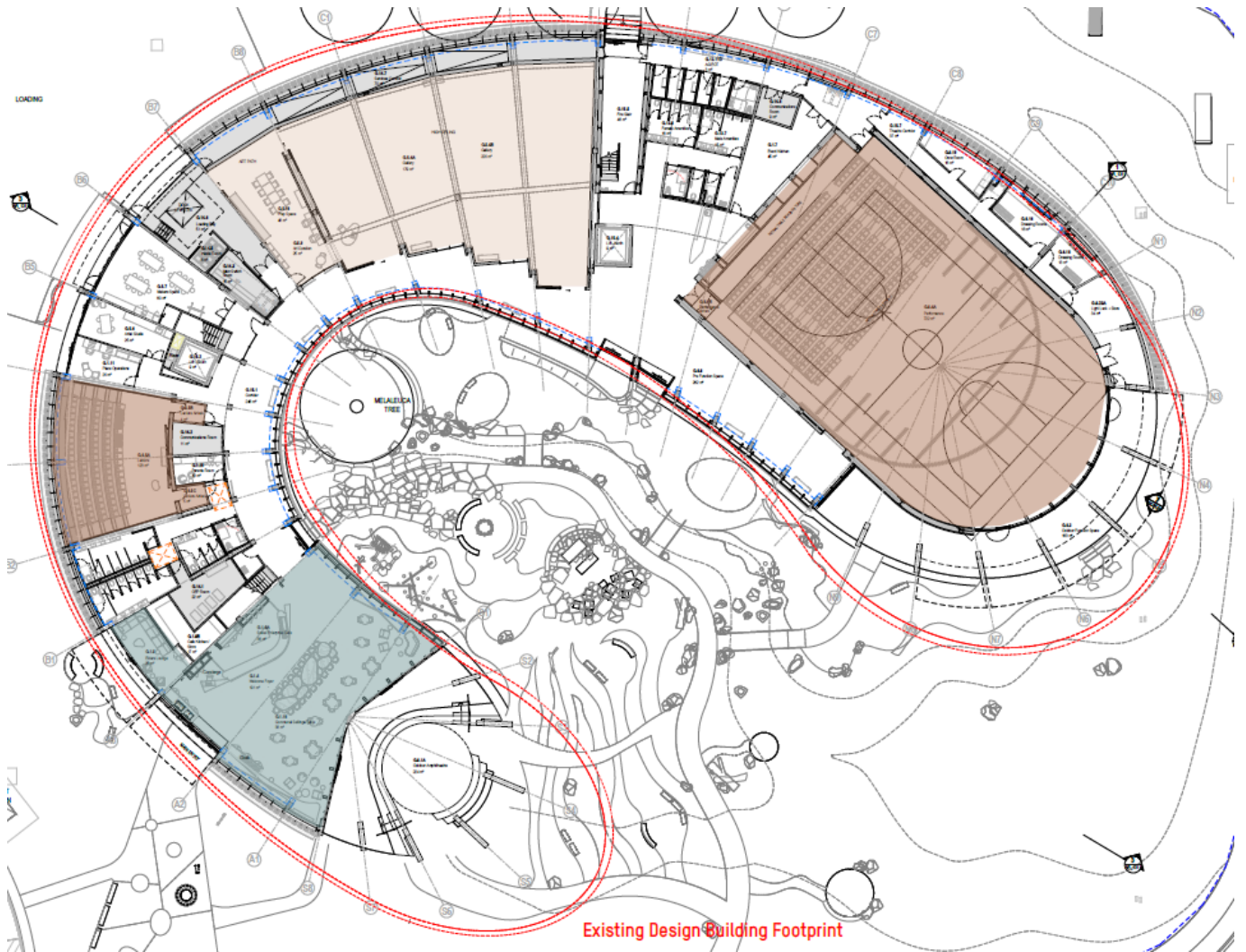


Figure 1 Existing building footprint demonstrated by red line and amended proposal shown by black outline.

Source: JCBA, December 2025

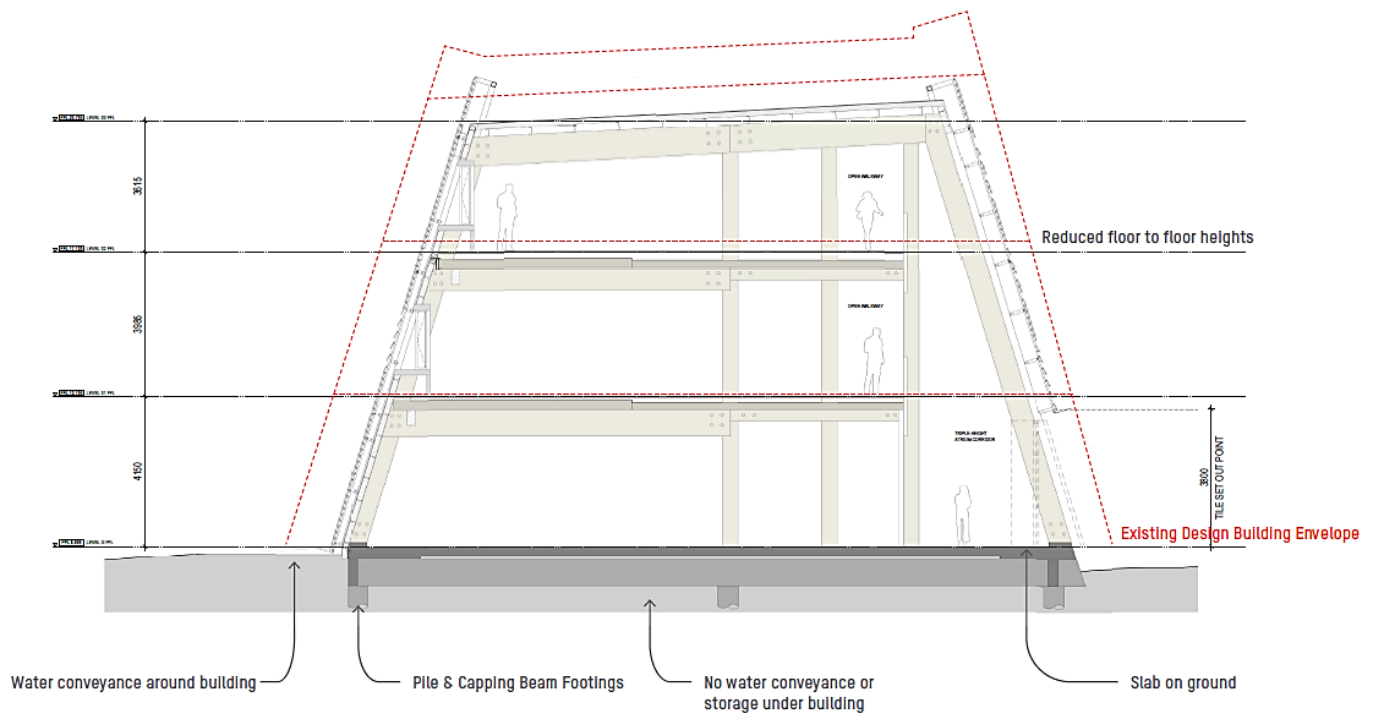


Figure 2 Typical building section, with the existing building envelope and floor to ceiling heights shown in red dashed line.

Source: JCBA, December 2025



Figure 3 Render of proposed building as viewed from secondary pedestrian crossing on Fifth Street looking northeast towards the building.

Source: JCBA, December



Figure 4 Render of proposed building as viewed from primary pedestrian crossing on Fifth Street looking north towards the building.

Source: JCBA, December



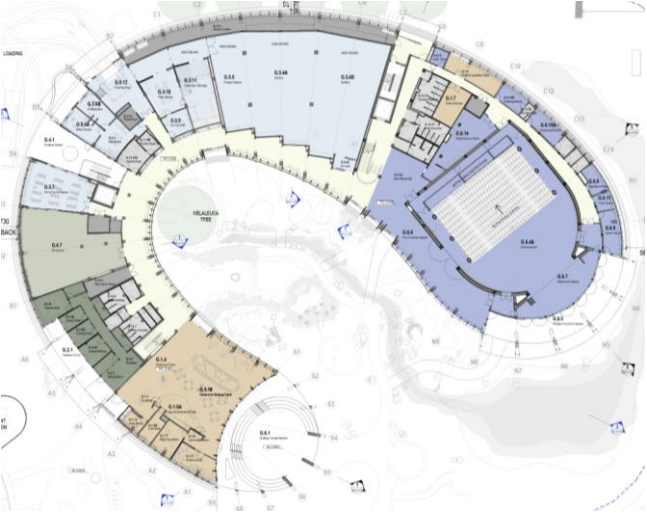
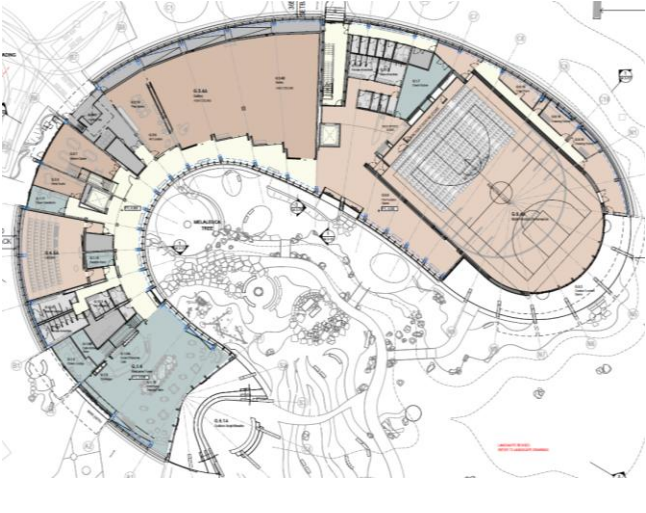
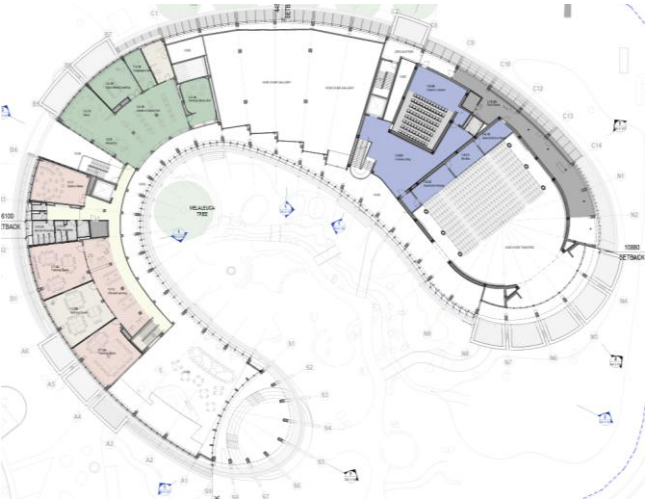
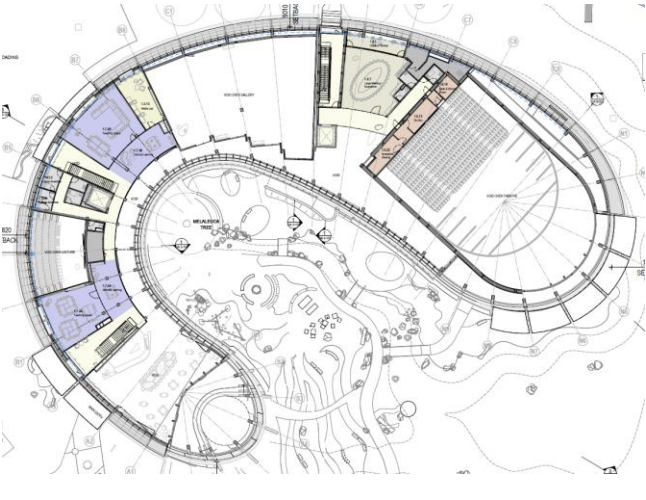
Figure 5 Render of proposed building as viewed from corner of Victoria Road and Railway Street looking southwest towards the building.

Source: JCBA, December

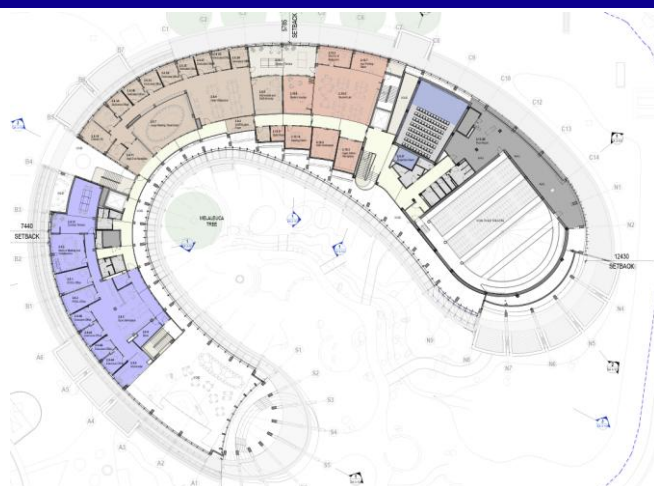
4.5 Internal Amendments

Considering the proposal has deleted the fourth storey of the building, most of the changes have occurred to rationalise the internal configuration of each level. To clearly illustrate these changes, a side by side of the existing and proposed floor levels have been provided within Table 6 below.

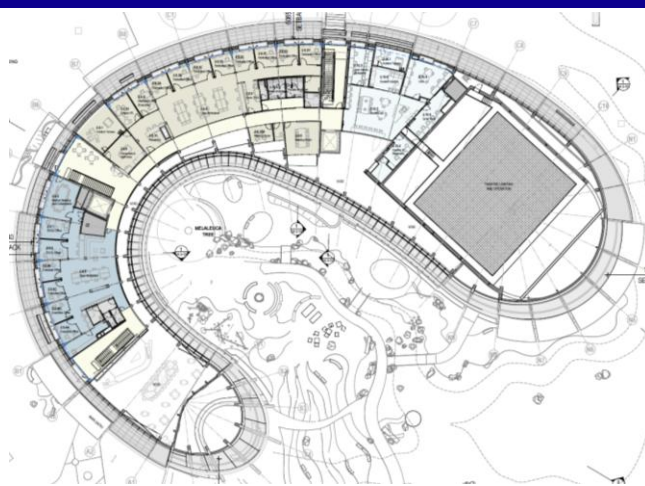
Table 6 Visual comparison of the existing and proposed development

Existing development	Proposed SSDA
Ground Floor	
	
Level 1	
	
Level 2	

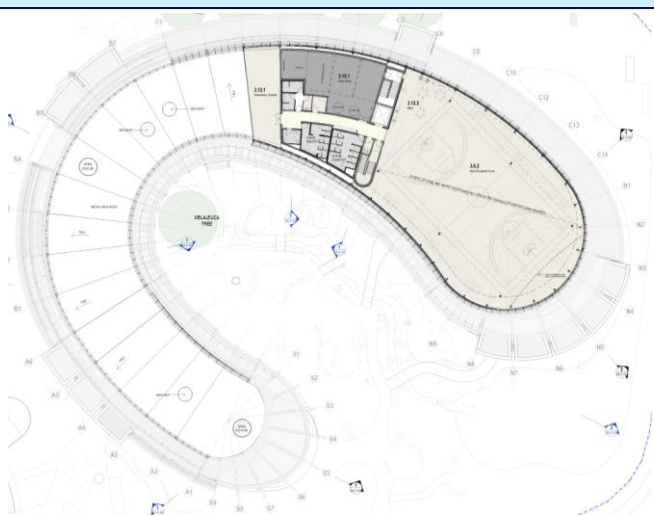
Existing development



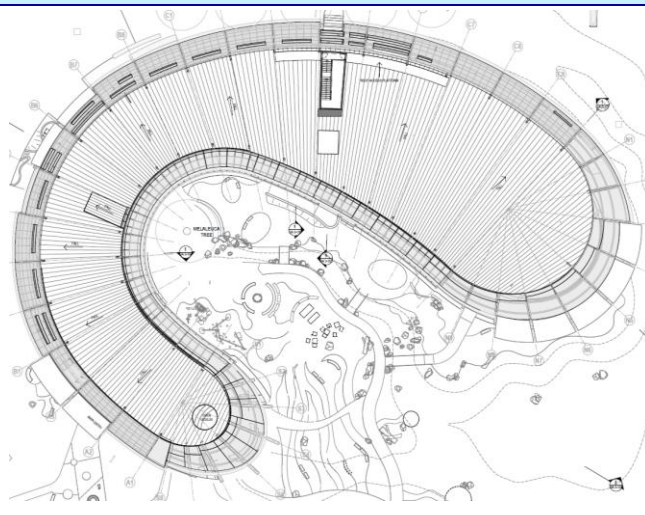
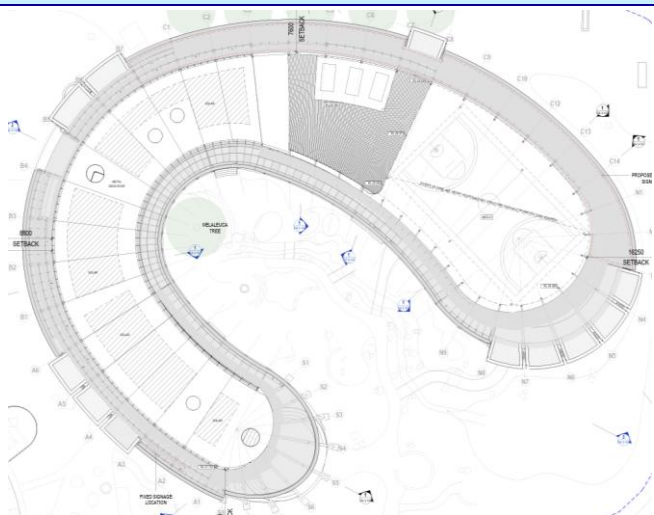
Proposed SSDA



Level 3



Roof Plan



Source: Images prepared by JCBA

4.6 Updated Mitigation Measures

As a consequence of the project amendments described in **Section 4.1**, the matters raised in submissions discussed at **Section 5.1** and the further environmental assessment outlined in **Section 6.0**, the Mitigation Measures for the project have been reviewed and updated. The updated Mitigation Measures are outlined in **Appendix B**.

5.0 Response to Submissions & Agency Advice

This section provides a detailed summary of the Applicant's response to the matters raised in submissions received. For ease of navigation and to reduce repetition, this section addresses matters based on project issues, as most of the items raised generally relate to flooding and heritage matters and have been categorised as such. Therefore, the typical form which is broken into project matters, economic, environmental and social impacts and procedural matters has not been applied in this instance, as most of these categories have been addressed within previous iterations of this SSDA.

The Applicant's responses are provided in the following format within Table 7 and is structured as follows:

- Flooding
 - Flooding (general overview)
 - Flooding – NSW SES
 - Flooding – City of Parramatta
- Landowner's consent
- Built form and Urban Design
- Heritage
 - Heritage (general overview)
 - Historical Archaeology
 - Aboriginal Archaeology
- Stormwater and Water Sensitive Design
- Remediation of carparks and borrow pits
- Structural Integrity
- Landscaping
- Water supply, take and licencing
- Groundwater impacts and dewatering requirements

5.1 The Project

The Applicant's response to issues related to the project are outlined in Table 7 below. Given the large number of flood concerns raised by various agencies, the response to these matters is separated by body for clarity.

Table 7 Response to Submissions & Agency Advice

Issue	Relevant submission/ stakeholder	Response
Flooding		
- The Department raises concerns regarding the high flood hazard present near and within the site, including the new car parks. The significant flood affectation warrants a comprehensive flood assessment and robust emergency response measures. - The Department requests a revised Flood Emergency Response Plan in close consultation with the City of Parramatta Council (Council), the NSW State Emergency Service and the Conservation Programs, Heritage and Regulation branch of the NSW Department of Climate Change, Energy, Environment and Water (CPHR of NSW DCCEEW) for identifying flood risks accurately, creating clear response procedures and safeguarding all site occupants, noting that NSW SES have raised concerns with the current arrangements proposed. - Additionally, the flood-related advice forthcoming from the CPHR of NSW DCCEEW must be addressed in full.	DPHI	The new car park areas have now been incorporated into the FIRA. However, the new car parks are not flood affected in even the 0.2% AEP event. PMF hazard on both sites is mainly low hazard (H1-H3).
Flooding – NSW SES		
NSW SES recommends providing adequate flood risk management measures that avoid reliance on a FERP; ensure people do not enter high hazard flood areas, noting significant depths adjacent to the building in a 1% AEP event.	NSW SES	A Flood Emergency Response Plan (FERP) is required documentation for this project. FERPs help laypeople understand how best to respond to residual flood risks at the site. (Residual flood risks are rare risks that can remain even after efforts have been made to improve the flood safety of a development by design.) The FERP has been simplified to adopt a Shelter-in-Place strategy. This approach clearly and simply directs occupants to stay inside and move upstairs when flash flooding is rising in the development's landscapes forecourt (to the south-east of the building). Occupants will be above the PMF level after only taking a few steps up the stairwell (1.4 m in height above the 9m AHD ground floor). As part of the updated FERP, a PA message will tell occupants to move away from the forecourt. WSU staff will ensure this area is cleared.

		Following evacuation of this area, doors connecting with the forecourt will be automatically locked by flood wardens when flooding first appears in the forecourt.
Change FERP/FIRA triggers to Severe Weather/Thunderstorm Warnings; remove reliance on on-site flood markers and 'evacuation orders' terminology; resolve contradictions between sections 7.4.2.2 and 7.4.2.3.	NSW SES	The emergency response has been simplified to have a very conservative, early evacuation trigger with a back-up shelter-in-place procedure.
Clarify how emergency supplies and services (power and water) will be assured; incorporate lift safety features; remove 'evacuate in place'; add 000 and 132 500 contact guidance; avoid placing flood wardens in danger.	NSW SES	Emergency supplies will be kept on site on level one as a matter of standard operation. Power and water backup can be confirmed in detailed design through a condition of consent. Lifts will be parked and become non-operational as flooding begins to impact the development. Contact numbers have been added to contact guidance.
Incorporate climate change guidance (ARR updates, Climate Change Calculator) reflecting increased frequency of events; update risk assessment and mitigation.	NSW SES	Flood modelling has been updated as per this request.
Clarify how the site will ensure people do not enter high hazard flood areas given 1% AEP depths up to 1m immediately adjacent to the building (greater with climate change).	NSW SES	As part of the updated FERP, a PA message will tell occupants to move away from the forecourt. WSU staff will ensure this area is cleared. Following evacuation of this area, doors connecting with the forecourt will be automatically locked by flood wardens when flooding first appears in the forecourt.
Principle 1 Any proposed Emergency Management strategy should be compatible with any existing community Emergency Management strategy. Any proposed Emergency Management strategy for an area should be compatible with the strategies identified in the NSW State Flood Plan and the Parramatta LGA Flood Emergency Sub plan, where evacuation is the preferred emergency management strategy for people impacted by flooding. Additionally, we: Reiterate our recommendation to reduce the reliance on flood wardens and human behaviour to initiate emergency procedures. The FERP continues to state "Flood wardens will observe the on-site flood markers at very regular intervals" and that emergency procedures	NSW SES	Alignment with the NSW State Flood Plan's Goals has been demonstrated in the updated FERP. - WSU will use Severe Weather Warnings and Severe Thunderstorm Warnings as well as BOM's rainfall estimates (>100mm) as an early trigger to tell occupants to go home or stay away from the site. As a backup, being cognisant that human behaviour may mean that some people insist on coming to, or remaining at the campus, a shelter-in-place is retained as a back-up option at this site given the quick rate of rise and quick duration. - The FERP has been updated to include two sump alarms (one at the 5% AEP level and one 0.2 m higher than the 5% AEP level) to automatically trigger an alarm and PA message that tells all

will commence when markers reach 7.8 mAHD, however as the PMF rate of rise shows flooding reaches flood level in a matter of minutes this is not a reliable trigger. • Recommend changing the evacuation and dissuasion triggers in the FIRA to be based on Severe Weather Warnings and Severe Thunderstorm Warnings. We also recommend understanding the likely warning time available from the FloodSmart system as this may not provide adequate warning time for safe evacuation of the site. • “On site flood markers” are also not considered to be suitable alternatives to Severe Weather Warnings for action triggers. • Request further details regarding how the following statement would be achieved: “Emergency supplies and services (power and water) will be assured by design and through operation and maintenance.”. The risks of water and electricity mixing if the building becomes permeated by floodwater should also be considered. • Reiterate our recommendation for consideration of safety features for any proposed lifts, to ensure that floodwater does not enter the lift and ensure people do not exit into flooded areas. • Recommend removing the statement “evacuate in place” from the Flood Impact and Risk Assessment (FIRA) and anywhere else this appears, as this messaging is confusing and unclear. • Recommend adding to Section 7.4 of the FIRA to contact 000 in all life-threatening emergencies. SES’s number (132 500) should be used for flood, storm and tsunami assistance in non-life-threatening circumstances. • Request that references to “evacuation orders” are removed, such as on pages 85, 91 and 92 of the FIRA. The Australian Warning System uses three categories of hazard warnings: Advice, Watch and Act, and Emergency Warning. These categories replace the previous terminology. • Note that regarding Section 7.7 “Engagement with the State Emergency Service”, the NSW SES Emergency Risk Assessment team are the appropriate team for providing advice on the FERP, and our team provided written advice on the FERP for this site on 10 July 2024. We also highlighted at this time that: - Shelter in place’ is not an endorsed flood management strategy by the NSW SES. - NSW SES further advises the development of a FERP should not be used to justify an increase in the population exposed to high hazard flooding. - This proposal... would not only place site users at risk but also pose a risk to the structural integrity of the building, as building piers would be exposed to this high hazard floodwater. The Flood Impact Assessment States “little warning time is available to safely administer an evacuation process.”		occupants to immediately move to level one. Having two alarms provides contingency. Both are to be fitted with back-up batteries or generators. • Severe Weather Warnings and Severe Thunderstorm Warnings, and the BoM estimated daily rainfall exceeding 100 mm have been adopted as the primary trigger to encourage people to stay home and not come into the ICoE. WSU already adopts a similar system where texts and emails are sent to ask people to stay home when extreme weather is predicted. • Severe Weather Warnings and the BoM estimated daily rainfall exceeding 100 mm have been adopted as a trigger. On-site flood markers have been replaced with two water level alarms to trigger immediate vertical evacuation. • The proposed development has been revised to not rely on back-up power given the potential period of isolation is less than a few hours. • The lifts will be parked on level one when a flooding emergency occurs in order to ensure that floodwater does not enter the lift and ensure people do not exit into flooded areas. • Done • Done • Done. An early evacuation trigger has been adopted based on severe weather warnings and the BoM estimated daily rainfall exceeding 100 mm. When this is triggered, occupants will be directed to “Act Now” by either leaving the site or staying away. • The comment quotes left is regarding an outdated design. Piers are no longer included in the design. • Shelter in Place is now a backup approach. The assumption is that all people follow the early evacuation order (stay home or leave the site immediately). The NSW DPHI released Shelter-in-Place Guidelines for Flash Flooding in early 2025. These guidelines have been developed because Government has identified that there is a place for Shelter-in-Place approaches to be used in order to reduce the exposure of communities to flash flooding by providing an alternative to hazardous and uninformed evacuation attempts by the layperson. The proposed development has been designed to be structurally sound in the most extreme flooding event.
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<u>Overreliance on the FERP</u> As stated above, we do not agree with the report's assumption that a PMF flood event would have "minor consequences" and "low risk" to life. The plan currently relies entirely on the FERP being executed without error, including: • persons on site identifying the risk or receiving warnings we note that relying on individuals to "observe flooding" is not suitable for various reasons • relying on email/text alerts assumes continuous availability of internet access and/or phone signal, which may not always be guaranteed during severe storm events.	NSW SES	A FERP has been required to accompany the proposal for this site. Mitigation of flood risks have been incorporated in the building's design. The building remains flood-free and connected to an emergency services access point even in a 1 in 500 year flood. A FERP exists to further strengthen the safety of the site by informing laypeople how they must act in order to secure their own safety if flooding occurs at the site. If the site did not have a FERP, occupants at the site that remain against the advice of earlier warnings would be uncertain on how best to protect their safety and the safety of others in a flood emergency. The assessment that a PMF event is a low risk to life is based on the following: • A FERP has been developed that filters out the number of people on site by asking people to stay home is a severe weather warning is issued. The remaining people will get an alarm that directs them to immediately move to the first floor once a 5% AEP flood level is reached. Moving up out of the flood hazard zone is not onerous. Walking up a few steps will elevate an evacuee 1.3 m above the ground floor. This can be achieved in a matter of seconds. • The ground floor incorporates ample freeboard even in a 0.2% AEP (1 in 500 year event) where there is 0.4 m freeboard above the flood level. The only modelled event where the ground floor is overtopped is the PMF which has a likelihood of occurrence approximate to 1 in 1,000,000 years. Likelihood of an event (in this case 1 in 1,000,000 years) has been factored into the risk assessment and influences its assessment as low risk. An email or text alert will be sent when a severe weather warning is issued. This will be well in advance of the event actually occurring.
<u>Timely provision of warnings and actions for users of the site.</u> • This includes assuming all warnings and communications equipment being fully operational, no power outages to the voiceover equipment or speakers, all persons being able to hear the messaging (i.e. not deaf/hard of hearing nor wearing noise-cancelling headphones, etc), and all persons heeding the messaging and acting in a timely manner. • Even if people could be warned in time, we note that the FIRA states the mitigation strategy relies on the idea of "forcing occupants out of harms way". However, we note the plan relies on human behaviour, which cannot be relied upon due to the unpredictable nature of individuals.	NSW SES	The warning system will be connected to an elevated backup battery to ensure it can operate during an emergency. Flashing lights will turn on and alert anyone who's deaf/hard of hearing nor wearing noise-cancelling headphones. Flood wardens will seek out confused people during a shelter-in-place trigger to help them move upstairs.

		Unfortunately, human behaviour is an unavoidable element of any emergency action. In an effort to eliminate the impacts of human behaviour during a flood event, the building's design has elevated the ground floor in such a way that people are safely protected from flooding in a 1 in 500 year flood event with 0.4 m of freeboard provided even in this very rare event.
<u>Sufficient mobility of all persons onsite to access an upper level.</u> Due to the timing of this happening within a few minutes, people may need to self-evacuate upstairs, and lifts cannot be assumed due to risks of power failure or flooding of lift wells.	NSW SES	When a flood alarm sounds, disabled people and elderly people will be prioritized for lift usage. Lifts will continue to run for 8 minutes following the trigger and then lifts will be parked on level one above the PMF level at this point. This 8 minute trigger is based on the worst possible scenario where a PMF could rise from the 5% AEP level to the ground floor in approximately 15 minutes. For context, the PMF event has a probability of approximately 1 in 1,000,000 years and the ground floor remains at least 0.4 m above the flood level in a 1 in 500 year event. Flood wardens will assist people with mobility issues up the stairs if the situation demands. This will be the adopted approach if lifts stop working during the 8 minute period.
Due to the nature of flash flooding on the site, should a PMF event occur, all of these steps would need to be executed perfectly within the space of a few minutes. We reiterate our previous advice that a FERP is not a failsafe way of managing an underlying flood risk, and highlight that the risk of "catastrophic consequences... to human life" is not considered to have been sufficiently mitigated for this site.	NSW SES	The early trigger hopes to avoid any people being present at the site. The shelter in place strategy is retained only in the event that some people refuse to follow this advice. The building has been designed so that it is flood safe for occupants even in a 1 in 500 year event. It incorporates a floor that is well-elevated above the PMF flood level and this can be accessed via one of the many stairwells in minutes. No failsafe risk management strategy exists when human behaviour is involved but the risk mitigation by design and the emergency guidance incorporated in this development's design and operation provides a sound framework to manage risks (as risk can never be fully eliminated) and keep people safe, indoors, elevated and protected from floodwaters.
<u>Overreliance on flood wardens</u> The FERP states that "Flood wardens should survey the ground floor to help occupants make their way to floor one and should conduct a check to make sure all occupants have vacated the ground floor". This could place the flood wardens in potentially life-threatening danger, particularly due to the potential rate of rise of the floodwater.	NSW SES	Flood wardens are no longer required to serve this function.

Principle 2 Decisions should be informed by understanding the full range of risks to the community. Decisions relating to future development should be risk-based and ensure Emergency Management risks to the community of the full range of floods are effectively understood and managed. Further, risk assessment should consider the full range of flooding, including events up to the PMF and not focus only on the 1% AEP flood. As the height of a flood event will not be known until after the flood event, risks should be considered up to and including the PMF. We note the hydrograph provided in the FIRA highlights the rapid rise of floodwater to become above floor level within approximately 10 minutes from the start of the floodwater rising. Additionally, the hydrograph on page 80 of the FIRA indicates that based on a Marsden Weir PMF, the flooding in the building would completely inundate the entire ground floor and reach the first floor level in a PMF event, therefore reaching depths of 4.35m above ground floor, which is H6 hazard and all buildings exposed to this hazard are considered vulnerable to failure. We reiterate that NSW SES has previously responded to flooding incidents in the area of the university campus including road inundation.	NSW SES	The building's design has incorporated flood risk mitigation in its design with compliant floor levels that remain well-elevated above the 1 in 500 year level and has been designed to be structurally sound in the rarest event – the PMF. The risk assessment has included a range of flood events including the PMF event. The revised flood response has been based on the assumption that any flood trigger could be a PMF event and therefore alerts demand immediate action as soon as flood levels reach the 1 in 20 year flood level. Marsden Weir is located 2.4 km upstream of Vineyard Creek and has a higher elevation and flood level to the subject site. The PMF flood level at that location is not relevant to the site. The hydrographs at Marsden and Charles St weirs have been used solely to get an understanding of riverine flood behaviour on Parramatta River during a PMF in terms of rate-of-rise and duration. The area's flood risk is understood by the Applicant and design mitigation and flood emergency response has been developed in order to reduce the burden on the SES. Shelter-in-Place (as supported by DPHI for areas subject to flash flooding) has been adopted at this site so that occupants don't go into the roadway during a flood event.
Principle 3 Development of the floodplain does not impact on the ability of the existing community to safely and effectively respond to a flood. The ability of the existing community to effectively respond (including self-evacuating) within the available timeframe on available infrastructure is to be maintained. It is not to be impacted on by the cumulative impact of new development. Risk assessment should have regard to flood warning and evacuation demand on existing and future access/egress routes. Consideration should also be given to the impacts of localised flooding on evacuation routes. Evacuation must not require people to drive or walk through flood water. Development strategies relying on an assumption that mass rescue may be possible where evacuation either fails or is not implemented are not acceptable to the NSW SES.	NSW SES	The adoption of an early warning approach with a backup shelter-in-place approach for backup, reduces the need for the SES and emergency services to assist evacuation attempts at this site. Severe weather warnings are issued in advance of storm events and this will provide a buffer of a few hours in which those on site may leave prior to storms hitting the area.
Principle 4 Decisions on development within the floodplain does not increase risk to life from flooding.	NSW SES	The isolation period is less than 1 and a half hours in a PMF and only marginally longer (2 to 2.5 hours based on the Victoria Rd sag) in a 1%

Managing flood risks associated with Low Flood Islands requires careful consideration of development type, likely users, and their ability respond to minimise their risks. The site is considered a low flood island, as the definition of a low flood island is where “the roads can be cut by floodwater, closing all the evacuation routes and creating and island” and “the flood island is lower than the limit of flooding” (i.e. lower than the PMF).

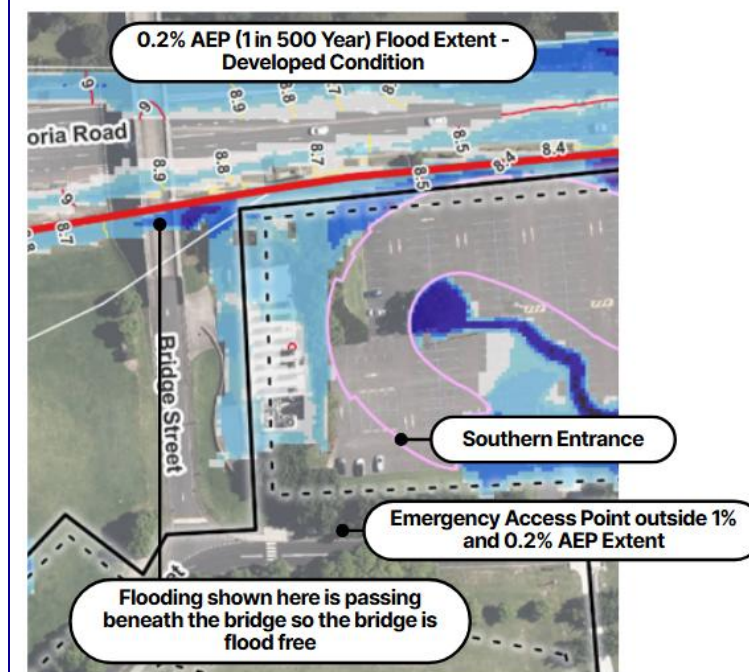
The statement that “Even in a PMF event, emergency access to and from the site can be achieved via the Bridge St overpass” does not consider that there would be no flood-free access to the building, nor does it consider that this strategy relies on the stability of a bridge which would be exposed to H5 hazard floodwater.

Managing flood risks for low flood islands includes consideration of:

- Isolation – There is no known safe period of isolation in a flood, the longer the period of isolation the greater the risk to occupants who are isolated.
- Secondary risks – This includes fire and medical emergencies that can impact on the safety of people isolated by floodwater. The potential risk to occupants needs to be considered and managed in decision-making.
- Consideration of human behaviour – The behaviour of individuals such as choosing not to remain isolated from their family or social network in a building on a floor above the PMF for an extended flood duration or attempting to return to a building during a flood, needs to be considered.
- Ability of persons to access flood-free refuge – The rapid nature of flash flooding in this area may limit the ability of individuals to safely access higher levels prior to inundation of the ground level, particularly for individuals with less mobility.

AEP event which has reduced severity in that a 1% AEP event will not inundate the building. This is a manageable period of time with relatively low inconvenience to occupants.

The site has a flood free path to an emergency access point that is outside the 1% AEP and 0.2% AEP (1 in 500 year) flood extent.



Whilst in a PMF event, the access point becomes inundated, the bridge itself remains above floodwaters. In the extremely rare event that a PMF flood (a 1 in 1,000,000 year event that impacts the emergency services access point for an hour or less) coincides with a secondary medical emergency, emergency services vehicles can wait north of the site and proceed only when floodwaters are obviously receding from the site.

The warning announcement will inform occupants that flooding recedes quickly in order to reduce the chance that they'll attempt to evacuate. The announcement will tell them they must move to level one and not exit the building.

		This is discussed above. The building's ground level remains well-elevated above a 1 in 500 year flood but the emergency response acts on the assumption that any flood triggered by the sump alarm could be a PMF flood so timing is dictated by that event. Occupants are told to immediately progress to level one and that immobile people have priority to use lifts for 8 minutes before they become parked on level one above the PMF level.
The site is not suitable for shelter in place, due to the high hazard (H5 and H6) flooding both on the site immediately adjacent to the proposed building and on adjacent roadways. We also note that the site is prone to flash flooding with limited warning time, meaning that safe evacuation is unlikely to be feasible. Therefore, we recommend reconsidering development on the site, due to the significant flood risks, which have not been demonstrated to be sufficiently mitigated. We reiterate that the NSW SES is opposed to the imposition of development consent conditions requiring private flood evacuation plans rather than the application of sound land use planning and flood risk management. We also recommend requesting clarification regarding how the site will ensure people do not enter high hazard flood areas. During a 1% AEP event, modelling shows the floodwater with depths of up to 1m would be immediately adjacent to the building, and flood depths more generally in this area would be greater than 1m during this event (in the area considered as flood storage). This depth increases to greater than 1m depth and H4 hazard immediately adjacent to the building during a 1% AEP + climate change modelling	NSW SES	The building is not impacted by H5 flooding in all events up to and including the 1 in 500 year event. The only event where H5 abuts the building is in the extremely rare PMF event. The severity of a H5 flood hazard is understood and as such, the structural design of the building has been devised to withstand this situation. Doors will be automatically locked following the first 8 minutes after the alarm is triggered. (A manual override will be able to open this up if someone is attempting to enter at the 8 minute mark so that they're not automatically locked out.) In a PMF event this would allow 5-8 minutes buffer time before the ground level is overtopped.
<u>Climate change</u> Current evidence suggests that flood events will become more frequent due to climate change. A Climate Change Calculator has been developed to address the updated ARR climate change guidelines, recommending the adjustment of the BoM 2016 IFDs to account for the warming that has occurred since the mid-point of the data used for their development (1961-1990). This results in a significant increase in existing conditions flood levels. The change in flood probabilities with climate change results in the new probability of the 1 in 100 AEP for the current 2025 scenario to be approximately 1 in 54 AEP event for the Parramatta River and approximately 1 in 38 AEP event for the local catchment area, with these events becoming even more frequent in the future. For the proposed development site, this could result in more frequent inundation and isolation than what is currently expected based on previous modelling.	NSW SES	A factored 1% AEP event that incorporates a loading to emulate present-day climate change has been added to the modelling suite and compliance has been demonstrated against this design event.
Principle 5 Risks faced by the itinerant population need to be managed.	NSW SES	Risks at the proposed development has been managed by design and with an emergency response plan to manage any residual risk that exists beyond the development's design. Residual risks at the proposed development only includes flood events rarer than a 1 in 500 year event. Occupants remain flood free in the 1 in 500 year event and events more common than that.

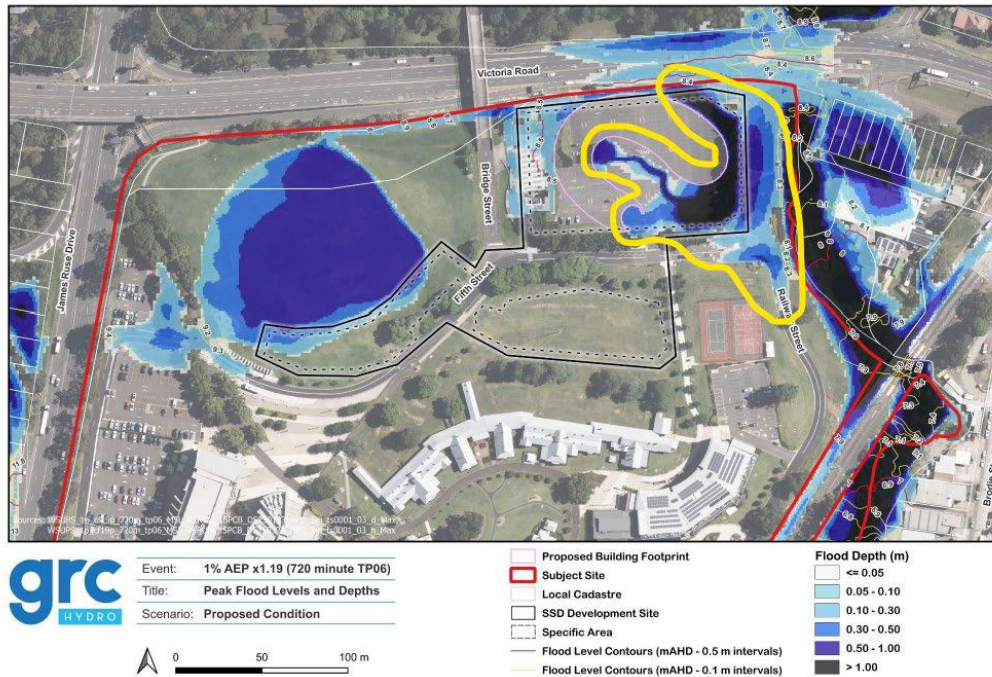
Principle 6 Recognise the need for effective flood warning and associated limitations. An effective flood warning strategy with clear and concise messaging understood by the community is key to providing the community an opportunity to respond to a flood threat in an appropriate and timely manner. Whilst we support the idea that “warnings will be clearly communicated to... would-be users of the site via a range of electronic and aural means both on-site and offsite (to discourage people trying to travel to the site)”, we recommend that this is done prior to the start of the university day. To do this, we recommend implementing early triggers in the FERP, such as Severe Weather Warnings from the Bureau of Meteorology. This is particularly challenging and likely to result in many “false alarms” as there are no formal warning systems for flooding at the site. We also note that NSW SES utilises the Australian Warning System (AWS) which is a nationally consistent, three-tiered approach to issue clear warnings and lead people to take action ahead of severe weather events. We therefore recommend removing the phrase “evacuation order(s)” from the FIRA and other relevant documents, as this terminology is now outdated.	NSW SES	The FERP has been updated with a more simplified strategy. An early warning has been adopted as per SES advice with the adoption of Severe Weather Warnings from the Bureau of Meteorology and the estimated daily rainfall exceeding 100 mm as a trigger to ask staff and personnel to stay home, work remotely and cancel or postpone any planned events that day. This warning should be issued as soon as the Severe Weather Warning is issued by BoM. The shelter in place response is preserved in the event that some staff or occupants choose to come into the building despite the request to stay home.
Principle 7 Ongoing community awareness of flooding is critical to assist effective emergency response	NSW SES	Flood awareness will be ongoing at the site with visual aids, posters, signage, emails, texts and announcements reminding staff and students of the site's flood liability.
Flooding – DCCEEW CPHR		
CPHR understands that City of Parramatta Council accepts the GRC Hydro model for the purposes of assessing this development due to errors in the model used for the Parramatta River Flood Study model. Nevertheless, CPHR is not satisfied that the model accurately represents local overland flooding. The model does not provide sufficient detail to make assertions regarding local overland flooding of Victoria Road, because runoff from Victoria Road has been applied in the model either upstream or downstream of the road itself. Sub-catchments should be discretised for the road surface and relevant pits and pipes should be included in the model. This is particularly important given that the road is 6 lanes wide and rises to a bridge for a significant distance in the order of 500m. This road catchment could create local overland flooding when pit capacities are significantly exceeded. Shorter storm durations would be critical compared to those for Vineyard Creek.	DCCEEW CPHR	The FIRA has been updated to refine the hydrological and hydraulic models to more accurately represent local overland flooding on Victoria Road.

Only with the above additional detail in the model would it be possible to make conclusions about the frequency of local overland flooding in Victoria Road and therefore the frequency with which access and egress is lost. <i>CPHR recommendation</i> The FIRA is updated to refine the hydrological and hydraulic models to accurately represent local overland flooding on Victoria Road.		
- CPHR previously requested consideration of flood impacts for the full range of flood events. Only the 1% Annual Exceedance Probability (AEP) flood event has been considered. Impacts for the 5% AEP flood event and the Probable Maximum Flood (PMF) should also be modelled to understand the impact of the development on flood behaviour for a range of flood events. Hazard mapping in the FIRA indicates that the development would increase hazard in the PMF. <i>CPHR recommendation</i> - The FIRA is updated to consider flood impacts for the full range of flooding.	DCCEEW CPHR	Impacts have been shown for all events and included within the updated FIRA.
- As stated in the above recommendation, further modelling is needed to address local overland flooding on Victoria Road. This revised modelling may lead to a higher frequency of inundation and isolation, which would increase the risk of several adverse outcomes, as previously advised by CPHR. <i>CPHR recommendation</i> - Following the completion of updated modelling, which is to include local overland flooding on Victoria Road, the discussion in the FIRA on access and egress should be updated.	DCCEEW CPHR	The FIRA has been updated to address access and egress.
- In the PMF, floodwater from Vineyard Creek would inundate the ground floor to a depth in the order of 1.3m. The FIRA maps high hazard floodwater around the proposed building and on surrounding roads. The Parramatta River PMF would also isolate the site. CPHR previously recommended consideration of the time duration of isolation from a range of storm durations. CPHR anticipates that the duration of isolation could be over 12 hours, and this has been confirmed in another study. <i>CPHR recommendation</i> - The consent authority considers the risk associated with high hazard flooding and the potential for long duration flooding.	DCCEEW CPHR	The modelled local PMF inundates the ground floor level for less than 1 hour. The updated FERP demands all staff, students and guests leave the site if a severe weather emergency is predicted. A shelter-in-place strategy has been kept in place as a back-up system to inform occupants on how to respond if there happens to be any people present at the site if an emergency occurs.
CPHR previously advised that shelter in place is not considered suitable in areas of high hazard flooding or when the duration of isolation is not short. While the FIRA has assessed the development against the Shelter-in-Place guideline for flash flooding, the commentary on page 107 has omitted that the PMF would cause high hazard flooding around the proposed building and on surrounding roads. Therefore, the requirement under item 8c of the guideline has not been met. <i>CPHR recommendation</i>	DCCEEW CPHR	The updated FERP identifies early warning evacuation as the primary response. WSU will demand all staff, students and guests leave or stay away from the site if a severe weather emergency is predicted. A shelter-in-place strategy has been kept in place as a back-up system to inform occupants on how to respond, if there happens to be any people present at the site if an emergency occurs.

• The consent authority considers the risks associated with sheltering in place with high hazard flooding.		
CPHR previously raised several issues with the Flood Emergency Response Plan (FERP) that have not been adequately addressed: • Details of “back up power and water provision” should be provided given the sensitive nature of this development. • Details should be provided on the number of occupants on the ground floor and how much space per person would be available in the shelter locations. • The nominated emergency access point immediately south of the proposed building’s southern entrance would not provide emergency access as the area is subject to H4 hazard in the PMF. • The FERP suggests that “staff should specifically look for warnings related to Parramatta River”. The FIRA should clearly state that: - BOM issues severe weather warnings and flood watches, but does not issue flood warnings for the Parramatta River - Flood Watches may provide advanced notice of flooding, but these would not provide advanced notice for all flood producing rain events affecting the development site. - Severe weather warnings would not be issued for all flood-producing rain events affecting the development site. • CPHR is concerned that there is insufficient time to relocate the number of people on the ground floor to the first floor with a warning time of less than 20 minutes. The FIRA has not demonstrated that the time available would be sufficient for flood wardens to initiate relocation of occupants and complete this process. In addition to the above, CPHR has identified further issues in the latest FIRA: • While Bridge Street may remain low hazard in a PMF event, the building itself is surrounded by high hazard floodwater, which is unsafe for people and vehicles. Bridge Street is also one-way in the direction towards the university. While it may be acceptable for emergency vehicles to travel in the opposite direction of traffic, this may not be feasible for an evacuation. Further, on arrival in James Ruse Drive, vehicles would need to turn left and from there either return to Victoria Road, which would be flooded or continue south along James Ruse Drive to Camellia, which would also be flooded. CPHR therefore does not recommend the FIRA or FERP state that emergency services can assist occupants via Bridge Street. Further, it should not be suggested that the site can be evacuated via Bridge Street. • Section 7.4 and subsection 7.4.2.2 suggest evacuation notices be issued, which contradicts the recommended shelter in place strategy. Similarly, Section 7.4.2.1 refers to the shelter in place strategy as a contingency. Early closure may instead be considered in response to flood watches or FloodSmart warnings. The FIRA must be clear and consistent on the proposed emergency management strategy. • Figure 52 should be deleted as the location is subject to H4 flooding in a PMF. Figure 53 should also be deleted as access to the building during a flood event should not be promoted.	DCCEEW CPHR	The FERP and emergency strategy in general has been updated to be more conservative and demand all staff, students and occupants to leave or stay away from the site when a severe weather warning is issued for Sydney (not just focused on an event specific to the Parramatta area.) Reliance on FloodSmart has also been removed. The point is taken that not all rain producing events at the site will be captured by a severe weather warning. The proposed development is passively flood protected higher than the 1 in 500 year flood. It is unlikely that a storm event capable of generating 1 in 500 year flows will not be captured in a severe weather warning. The emergency response has been updated with the goal that the site is completely empty when a flood event occurs. However, a back-up shelter-in-place procedure has been left in place so that any people who happen to be present at the time will have ample guidance on how to respond and the importance of acting quickly will be stressed. Backup power will be assured for a designated shelter-in-place area through the installation of a battery (with back-up protection) in a flood-safe location well above the PMF level. This battery will support basic systems such as some lights and power outlets that can be used to charge phones. It will not be used to continue lift usage. The specific details of the battery system and its placement can be provided as a condition of consent. A backup water tank will also be installed in a flood-safe location that can provide drinking water for the short duration of isolation. The operational intent is that no-one is present at the site during a flood event and the only event to overtop the ground floor – the PMF event – has been modelled to recede within 1 hour – a manageable period in which to shelter in place with only limited power. Bridge Street’s usage in emergency response would be restricted to emergency service vehicles only and only in times where: - A 000 emergency request has been called to the site, and

- The FloodSmart system should not be relied upon to inform development assessment. Warnings provided by the system cannot be expected to provide sufficient warning for this development. This is in part due to the very short time to onset of site flooding, which is established as 20 minutes in the FIRA. <i>CPHR recommendation</i> - The FERP section of the FIRA should be updated in accordance with the above comments and document the risks associated with the very short warning time.		Emergency personnel can confirm, with cooperation from occupants on site (the subject of the emergency or people supporting them), that the roadway west and south of the site's main entrance is flood free and a flood free connection with the building is maintained. In a PMF event, it's likely that emergency services personnel will be staying put in a safe location until the peak of the event subsides anyway, so people needing assistance at the site are unlikely to be any different to others needing assistance along the Parramatta River during such a severe event.
Flooding – City of Parramatta		
<u>Flood modelling requirements</u> 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.	COP	GRC has modelled this scenario and included results and impacts within their report. Other agencies such as CPHR and SES, have requested that the 1% AEP with scaling in alignment with what ARR considers as 'present-day climate change.' This is approximately equivalent to an 11% rainfall in increase on top of the 1% AEP event. This has been adopted as the compliance event in keeping with agency requests.
Hydraulic Consistency: Confirm that upstream flows at Victoria Road bridge match the adopted Parramatta River Flood Study.	COP	GRC's modelling has been adopted at the site as the PRFS model was found to be unsuitable. GRC's previous reporting has documented the verification of the model.
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.	COP	Previous versions of works preserved all storage by retaining an open undercroft area. However, based on Councils preference the works are now slab on ground. This does involve 2,200m³ of flood storage being lost on the site (which is approximately 0.5% of total event volume in the defined event). Despite this minor loss of flood storage at the terminal end of the catchment, the detailed impact assessment carried out indicates no downstream or upstream impact. For loss of storage, under standard hydrological theory any impact would be in the downstream. As per GRC's impact mapping reported there is no impact.
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.	COP	This area is not a detention basin. It is only temporarily inundated in rare storm events and it will be drained by a pipe that connects with the existing stormwater infrastructure that drains to Vineyard Creek.

Figure 41: Peak Flood Levels and Depths – 1% AEP (with additional 19% rainfall loading)– Developed Condition



- Safety: Consider fencing and other safety measures where required.

COP

Fencing is not required given that the ordinary state of the site would be completely free of water or have a shallow puddle at its lowest point. By contrast, Vineyard Creek, north of Victoria Road is not fenced.

- Overland Flow: Design and incorporate a safe overland flow path from the oval.

COP

A depression along the site's northern boundary facilitates a safe flow path from the oval to the site. This flow path is located in an area that is rarely trafficked by pedestrians and the flow path travels beneath the section of Bridge Road that overpasses Victoria Road.

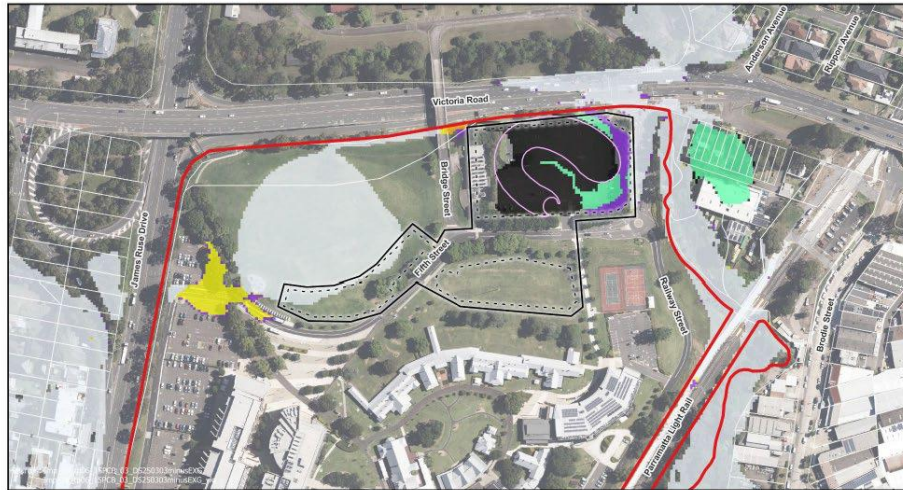
Flood Impact Assessment:

COP

The assessment using the 19% factor is presented in Figures 23-24, 48-50 of GRC's report. However, the Defined Flood Event for the purpose of GRC's reporting is the 1% AEP with present day climate change.

Detailed impact assessment has been carried out. For loss of storage, under standard hydrological theory and impact would be in the

Figure 36: Flood Level Impact – 1% AEP – Developed Condition Minus Existing Condition



- 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.

downstream. As per GRC's impact mapping reported there is no impact.

Detailed impact assessment has been carried out. As per GRC's impact mapping reported there is no impact off-site and the proposed works comply with requirements regarding FPL.

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.

COP

This information has been provided at Section 6.3.8 of GRC's report.

This information accompanies the RTS.

Landowner's consent

- Under section 23 of the EP&A Reg 2021, written consent from the landowner or evidence of notification to the landowner prior to lodgement is required. The Department notes that the Crown Lands consent obtained prior to lodgement pertains only to Lot 100, not Lot 101.

DPHI

Following discussion with DPHI on 6 November 2025, it was advised that DPHI would take this matter offline and discuss with Crown Lands separately. At the time of drafting this Submissions Report, a formal response from Cown Lands and DPHI remains outstanding.

• Provide either written consent for Lot 101 DP 816829 from the Minister for Lands and Property or evidence that Crown Lands was notified of the development over Lot 101 before lodgement, satisfying section 23 of the EP&A Reg 2021.		If required, this documentation can be provided prior to determination of the assessment.
Built Form and Urban Design		
• The Design Integrity Panel (DIP) should reconvene and provide advice on whether the project's design integrity has been impacted by the amendments, including: ◦ two new at-grade carparks, particularly regarding the landscaping and heritage context. ◦ a rooftop net enclosure with specific dimensions to be provided to the DIP. ◦ the proposed slab-on-ground design, which departs from the DIP endorsed landscape-led flood strategy.	DPHI	The amended proposal has reduced the overall scale of the building from four (4) storeys to three (3) storeys, and the rooftop net enclosure has been deleted. A DIP was undertaken on 15 December 2025. The following key observations were made: Temporary carparks The Panel acknowledges Western Sydney University's intention to enhance north-south pedestrian connections between the existing campus and the ICOE building as part of the Parramatta Place Strategy. It recommends that measures be implemented to mitigate any potential impacts of the temporary carparks on pedestrian movement. The Panel notes that the temporary carparks will necessitate the removal of a small number of non-significant trees, which will be replaced when the carparks are removed and landscaping reinstated in accordance with the Place Strategy. The Panel raises no objections to the proposed temporary carparking arrangement. Rooftop net enclosure This no longer forms part of the scope of the proposal. Slab-on-ground design The Panel notes that the revised design using piles, a capping beam, and a slab retains more soil in place, helps prevent water flow beneath the building, and uses less concrete than a raft slab, reducing carbon impact. The Panel has no objections to these changes and supports the proposed flood strategy design. Signage projection zone The Panel notes that approval for the programming and content of the projection will be sought separately through a future development application to Council. The Panel has no objections to the proposed location and size of the projection signage zone. Functional/internal changes The Panel notes the changes to functional areas within the building, including some spaces being reduced or integrated into other functional spaces. Adjustments to exhibition storage and project space have been managed through project governance. The Panel acknowledges these design changes and is satisfied that they do not

		materially impact the original design intent and that the project continues to uphold design excellence. Multipurpose court The Panel notes the relocation of the multipurpose court from the roof to within the performance theatre, acknowledging that this avoids negative impacts on the external landscape strategy that would result from relocating the court elsewhere on the site. The Panel also notes that the performance theatre retains its scale and materiality, incorporating a suspended grid for flexible sound and lighting and retractable seating to enable efficient transitions between different modes of use. Conclusion The Panel considers the evolution of the building and landscape design to be positive and consistent with the project's ambitions, without compromising design integrity. The refinement of materials, construction details, and updates to landscape treatment collectively maintain and enhance the project's design excellence.
Consideration should be given to reducing the size of the proposed projecting signage zone. The Department requests that the DIP review and evaluate the urban design recommendations made by Council.	DPHI	As discussed within the previous Submissions and Amendments Report dated August 2025. The proposed signage zone facing the Victoria Road frontage will provide an area for image projection onto the building zone. Given the signage zone will consist of a light projection, the material and architectural expression of the building will remain prominent and will not alter the built form. The objectives of the signage zone are to: - Enhance the nighttime presence of the ICoE and be a visual draw to the building and act as a visual gateway to the university. - Provide a display location for indigenous art and intermittent advertising for the university. - Control glare, discomfort, obtrusive light spill. - Consider the safety requirements for safe vehicular passage. - Minimise impact upon the local environment. - Be operated on a curfew period basis with the projection non-operational after 10pm. Further refinement of the signage zones will occur within a subsequent development application, where the content of the signs will be assessed. As stated above the DIP endorsed the signage strategy which will be subject to more detailed approval in future design refinement.
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	COP	The ICoE building will be located upon an area of the site consisting of an at-grade car park, known as 'P1 Car Park' which accommodates

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.

approximately 284 car parking spaces. There are five (5) trees along the northern perimeter of the car park, which provides visual relief to Victoria Road (refer to Figure 6 and Figure 7).



Figure 6 View of the site taken from the Victoria Road, road reserve looking south towards the site.



Figure 7 View of the site taken from the Victoria Road, road reserve looking southwest towards the site.

The buildings' formal entry points to the ICOE are located on the southern elevation of the building with direct access from the Elders carpark and pedestrian links from the campus. Activation of the ground plane is facilitated through various building functions and arrangement of outdoor and landscape areas. Supplementary entries to the building, such as the one on Victoria Road, provide important activation along the building's perimeter (refer to Figure 8).

Providing a single, clear entry point from Victoria Road serves multiple functions. It provides a celebrated arrival experience for pedestrians and is vital for maintaining space management and access control, which is a strategic consideration of the buildings design from a CPTED perspective.

Another key feature of the building's design is its singular façade system, which is optimised to different site conditions and orientations. The façade has two functions: a 'quiet façade' to the

central landscape that allows permeability and multi-sensory connections to the outdoor environment, and a 'protective façade' that buffers noise and air pollution from the central energy plant and Victoria Road to the north and west.

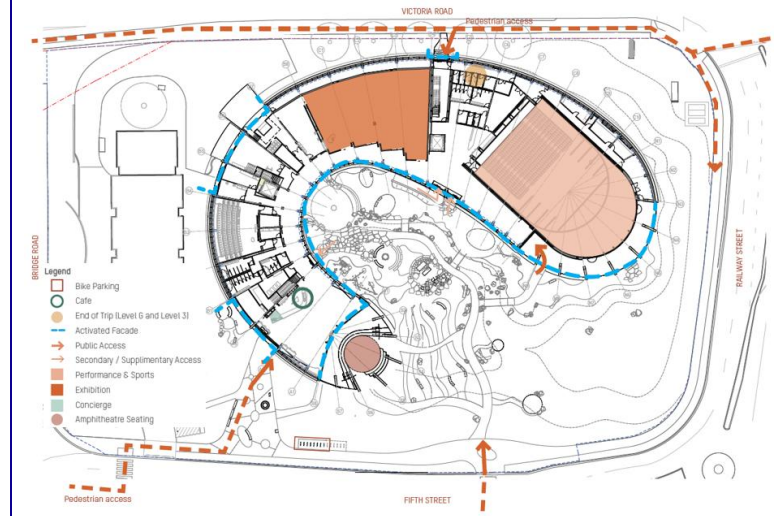


Figure 8 Figure demonstrating proposed entry points and activated facades of the building.

Additional landscaping will also be provided along the sites northern boundary to improve the activation and experience of movements along Victoria Road and softens the visual appearance of the building. Overall, the building façade has been designed in consultation with, and supported by, the Design Integrity Panel and provides an improved visual outlook to the public domain when regard is had to the existing outlook provided to Victoria Road, which is demonstrated within Figure 9. With regard of the matters outlined above, it is considered that the buildings presentation to Victoria Road provides a sufficient level of activation whilst also improving upon the current presentation to Victoria Road.

		 Figure 9 Likely future view of the site as viewed from the Victoria Road, road reserve looking southwest towards the site. Source: Virtual Ideas.
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.	COP	The proposed design has evolved with consideration to connectivity within the campus and internal pedestrian activation, as well as the site's key parameters including the retention and significance of the Melaleuca tree and Vineyard Creek. The building is oriented to provide an extension of the ecology of the creek and frame the Melaleuca tree which is proposed to be retained. The buildings' design has continued to evolve and has reduced in scale from four (4) storeys to three (3) storeys, and the rooftop net enclosure has been deleted. The buildings' modulation has been further refined as shown through the north tip of the structure being elevated to encompass the volume of the theatre and multi-purpose court, while the southern end is gently lowered while retaining a triple-height entrance void, facilitating natural way finding between large civic spaces and smaller, intimate areas. Further, the entire mass of the building tapers inward, giving the Melaleuca tree ample space to thrive and offering expansive views towards the sky. This tapering also serves structural purposes by reducing the required depths of structural elements and providing articulation to the overall built form.
A more refined signage zone that occupies less of the façade is recommended to ensure the material and architectural expression remain prominent.	COP	The proposed signage zone facing the Victoria Road frontage will provide an area for image projection onto the building zone. Given the signage zone will consist of a light projection, the material and architectural expression of the building will still remain prominent and will not alter the built form. The objectives of the signage zone are to: Enhance the nighttime presence of the ICoE and be a visual draw to the building and act as a visual gateway to the university.

		• Provide a display location for indigenous art and intermittent advertising for the university. • Control glare, discomfort, obtrusive light spill. • Consider the safety requirements for safe vehicular passage. • Minimise impact upon the local environment. • Be operated on a curfew period basis with the projection non-operational after 10pm. Further refinement of the signage zones will occur within a subsequent development application, where the content of the signs will be assessed.
Heritage		
• Heritage NSW has raised concerns about the significant visual impact on the landscape character within the curtilage of the State Heritage Register (SHR) item Rydalmere Hospital Precinct (former) (SHR no. 00749) and proposed the removal of the temporary carparks after two years.	DPHI	Please refer to discussion below which expands upon these matters.
• Respond to Heritage's advice in full and confirm if the proposed two-year period is achievable for the long-term Parramatta South Place Strategy to take place and to consolidate parking for the entire campus.	DPHI	The comments from Heritage NSW are acknowledged however, to facilitate the construction and delivery of the proposed development a minimum four-year period is required for the temporary car park. The reason behind this methodology is expanded as follows: • In 2025, the University commenced the preparation of a new Place Strategy for the Parramatta South campus. The Place Strategy will establish the future directions for Parramatta South as a flagship campus for the University's campus network. • The University commissioned Hill Thalys in conjunction with international design firm Sasaki and a team of specialist consultants to prepare the plan. • The first two phases of the project involved detailed campus assessment and extensive stakeholder engagement with the campus community. • The Place Strategy is now in the final phase, and the University is targeting completion by the end of 2025/early 2026. • The Place Strategy has considered and addresses transport and access requirements for the campus. A key initiative included in the Place Strategy is to consolidate car parking and to create a new multi-level on-campus car park. The location for this new facility has been identified in the Place Strategy structure plan. • The timeline required to deliver this capital project is as follows: - 2026 - Business Case ▪ Business Case preparation and approval

		▪ Project Initiation ▪ Procurement of project consultants ▪ Concept design - 2027 - Project Planning ▪ Schematic Design ▪ Development application documentation and lodgement ▪ Development assessment and approval ▪ Procurement of construction contractor - 2028 - Construction ▪ Construction commencement - 2029 - Facility opens ▪ Construction completion ▪ Commissioning ▪ Operational commencement • The temporary car parks will be decommissioned in 2029 following the commencement of the new permanent car park facility. • The University will make good, restoring the interim car parks as landscaped open space and the Place Strategy will guide the preservation and embellishment of this space into the future. The timeline provided above takes into account the time required to meet the University's business case process, including governance approvals, to adhere to the University's procurement policy and procedures (which are similar to NSW Government procurement policy), and for planning assessments and approvals by the relevant statutory authority. The heritage considerations applying to the temporary car park are expanded upon below.
<u>Temporary carpark</u> We continue to have concerns regarding the temporary carpark which, due to their large footprint, would have a major visual impact on the landscape character of the university. We note that the use of turf-cell for the parking spaces would reduce the visual impact of the carpark when the parking spaces are unoccupied, but that this would not be effective when the carpark are full.	Heritage NSW	As outlined in the submitted Heritage Impact Statement (HIS), the carpark are explicitly designed as temporary, low-impact interventions to support the delivery of the ICoE project. The carpark are not intended as permanent infrastructure and will be removed following completion of the new carpark structure proposed under the Place Strategy. Their purpose is to offset temporary construction staging and parking losses while minimising long-term landscape alteration. To minimise visual and physical impact, the following mitigation measures have been proposed and integrated into the design:

		• Turf-cell surface treatments will be used for all parking bays, allowing grass to regrow through the cells and visually blend with the surrounding lawn areas when not occupied. • No permanent built structures are proposed within the carparks, ensuring reversibility and retention of landscape openness. • Existing tree canopies and landscape features will be retained and protected where possible, with only minimal pruning or vegetation removal required. • The visual catchment of the carparks is relatively constrained due to existing built form and topography around the campus. As outlined in the HIS, views to and from key heritage elements such as the Vernon buildings and entrance avenues will be only partially affected, and not in a way that diminishes their identified heritage significance or historical relationship with the broader landscape. The proposed temporary carparks have been designed with consideration of their visual and physical impact on the heritage character of the WSU landscape. In line with the principles outlined in The Burra Charter: The Australia ICOMOS Charter for Places of Cultural Significance (2013), particular emphasis has been placed on ensuring that changes are both minimal and reversible. Article 15.2 of the Charter stresses that "changes which reduce cultural significance should be reversible and be reversed when circumstances permit". Accordingly, the use of turf-cell surfacing, demountable elements, and retention of topographic contours where possible are deliberate measures to ensure that the landscape can be returned to its original character once the carparks are removed. Further, Article 3.1 encourages a cautious approach of changing as much as necessary but as little as possible, which has been adopted through the avoidance of permanent built form, minimisation of hard surfaces, and careful placement to avoid direct impacts on significant fabric or viewsheds. While the temporary nature of the carparks means there may be intermittent visual interruption, especially when the carparks are full, their layout has been designed to preserve the key sightlines and landscape character of the site in accordance with the Charter's guidance on compatible uses (Article 1.12). Ultimately, the carparks are not intended to alter the long-term use, function, or heritage significance of the site. They are a short-term intervention made necessary by the logistics of the ICoE development and have been planned with reversibility and conservation of cultural values at the forefront of decision-making.
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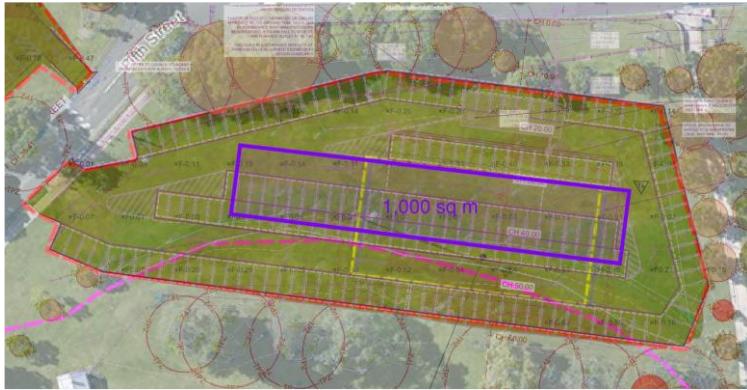
		It is further noted that the CMP identifies important cultural landscape values, including the importance of significant sightlines and the visual coherence of the campus setting. The HIS concludes that these key visual connections and curtilage relationships will not be obstructed or fundamentally altered by the temporary carparks.
We strongly recommend that the eastern carpark be redesigned to avoid partially overlapping with the location of the former (now-infilled) Ha Ha and airing yards (built heritage features), closely associated with Building ED, a c.1900 ward building of the former Rydalmere Psychiatric Hospital. The location of the Ha Ha has been identified in the HAA and HIS. The Ha Ha originally defined the northern edge of the airing yards of the former hospital (Building ED). The CMP identifies the airing yards and Ha Ha as a highly significant landscape that should remain undeveloped. The importance of not obscuring the line of the former Ha Ha is articulated in the following CMP policies. <i>Policy 3.1 Conservation requires the retention of an appropriate visual setting, including significant views, the line of former Ha Ha walls, and other relationships that contribute to the cultural significance of the place.</i> <i>Policy 5.2: Ensure future development does not obscure original fabric or the configuration of the place, including the location of the former Ha Ha walls.</i>	Heritage NSW	The concerns regarding the alignment of the former Ha Ha wall and its relationship to the airing yards of the former hospital precinct are outlined in the CMP and reiterated through policies 3.1 and 5.2. The proposed carparks have been deliberately designed as temporary and reversible interventions that prioritise minimal impact on the heritage landscape, both physically and visually. As noted in the HIS, important views between the historic hospital buildings, open lawns, and surrounding landscape are retained, ensuring that the sense of openness, institutional order, and axial relationships identified as central to the site's heritage significance are preserved. Additionally, the carparks avoid encroaching on the formal forecourts or circular lawn which are considered primary organising features of the site's layout. The design of the eastern carpark reflects a conscious minimisation of heritage impacts through: • Reversible, non-permanent treatments such as turf-cell paving • Avoidance of new built structures or vertical intrusions • Retention of significant views, as previously discussed • Minimised vegetation removal • Relocation of the borrow pit to avoid high-risk archaeological zones While a small portion of the carpark overlaps the interpreted alignment of the Ha Ha wall, this is not proposed to include significant excavation or permanent infrastructure, and no known extant wall structure is currently confirmed in this location. Based on the archaeological assessment, structural survival is considered low in the uppermost metre, particularly in areas subject to deep 1990s earthworks. As such, any potential remnant fabric (if present) is likely to be below the proposed carpark works. The proposed encroachment does not introduce structures or earthworks that would permanently obscure or reinterpret the alignment of the Ha Ha. The surface treatment remains visually permeable, and the overall topography of the site remains legible in the wider landscape. This respects the configuration of the place as defined in Policy 5.2 of the CMP.

		While policies 3.1 and 5.2 articulate a strong preference for retaining the configuration and visual setting of significant heritage elements, they do not explicitly preclude short-term or low-impact development. Given the expected low potential to encounter any surviving remains of the Ha Ha wall within the bounds of ground disturbance, and the designed reversibility of the intervention, Curio considers the temporary carpark to be within the intent of the CMP policies. Other mitigative measures such as opportunities for interpretive signage or visual marking of the Ha Ha alignment within the carpark layout, ensuring the heritage significance of the feature remains communicated during the temporary use period can also be considered.
We consider that even temporary development that breaches these policies would have a major adverse impact on the setting of the highly significant Building ED and the interpretation of the former airing yards and Ha Ha and would not comply with the CMP. We are also concerned that it could be used to justify future permanent development the area.	Heritage NSW	It is acknowledged that Heritage NSW is concerned regarding potential non-compliance with CMP Policies 3.1 and 5.2 due to the proposed temporary carparks. We also recognise the importance of preserving the visual and spatial integrity of this highly significant landscape feature. To this end, the following clarifications have been provided: <u>Temporary Works Do Not Equate to Permanent Precedent</u> The carparks are explicitly proposed as temporary construction-phase infrastructure to support the delivery of the ICoE project. Their inclusion does not imply or facilitate future permanent development in these areas. This position is supported by the broader planning context and the documentation provided as part of the SSDA, which includes clear commitments to remove all temporary elements once construction is complete. The use of non-permanent materials ensures full reversibility of the works once the ICoE project is complete. This approach aligns with the intent of Policy 5.3 of the CMP, which allows for contemporary interventions where they are sympathetic, legible, and reversible. The Burra Charter also supports this position, stating in Article 15 that new work should respect and have minimal impact on the cultural significance of a place, and importantly, that reversible changes are preferable to permanent alterations when required to meet contemporary needs. To reinforce this intent, Curio recommends the inclusion of a condition or statement of commitment within the project's construction staging plan and heritage management framework,

		confirming the complete reversibility of the works and the reinstatement of the affected landscape upon decommissioning <u>Minimising Heritage Impact Through Design and Location</u> Although there is minor encroachment on the alignment of the Ha Ha wall, the absence of aboveground heritage fabric, combined with the retention of overall topographic legibility, ensures that the spatial interpretation of the airing yards remains intelligible. <u>Alignment with the CMP's Underlying Principles</u> While the CMP (2008) does articulate a strong preference for avoiding development over the Ha Ha alignment (Policies 3.1 and 5.2), it also allows for adaptive responses that respect significance while accommodating necessary, reversible change. The Burra Charter, which underpins the CMP's conservation philosophy, encourages approaches that are reversible, interpretable, and do not result in permanent loss of significance; all of which apply to this proposal. In this context, the minor encroachment must be balanced against the need to stage construction and mitigate broader campus impacts, and the mitigation measures already embedded in the design. <u>Interpretation and Mitigation</u> Curio can also explore and recommend the integration of interpretive measures, including the suggestion visual marking or surface treatments that trace the Ha Ha alignment within the temporary layout, ensuring continued legibility of the former landscape element throughout the construction period. This can be further supported by interpretive signage or wayfinding elements that reinforce the site's heritage values for campus users. In summary, the temporary carpark design offers a measured and sensitive balance between heritage conservation and operational necessity, without compromising the long-term conservation intent of the CMP. Further refinements to mitigation measures can be considered, and continued engagement will be maintained to ensure consistency with Heritage NSW requirements.
We recommend that the university consider the cricket oval as a possible location for a temporary carpark. We would be happy to advise further on this option if requested.		The cricket oval is utilised by WSU as the principal open space on the campus for competitive sporting events and training as well as casual use by students. Therefore, utilising the cricket oval for parking is not feasible to the ongoing operation of the campus.

It is proposed that the eastern and western carparks would be temporary carparks that would be removed after five years. We recommend that the temporary period be limited to two years to ensure that an alternative permanent carparking solution is prioritised and to minimise the heritage impacts of the proposed carparks.		Please refer to the discussion above, which outlines that the temporary carparks would be required for a minimum of four years to facilitate the construction of the development and implementation of the Place Strategy for the Parramatta South campus. As such, it is recommended that this matter is conditioned, as follows: <i>The temporary replacement car parking is to be provided on the site in accordance with a construction traffic management plan and decommissioned after four (4) years. With the four (4) period, beginning once the construction certificate has been issued for the site.</i>
We recommend that details be submitted that outline methodologies for the proposed future removal of the temporary carparks and restoration of the landscape to its current condition.		Refer to discussion provided above and within the heritage RTS Report.
Historical Archaeology		
Section 8 of the Historical Archaeological Assessment (HAA) notes that ancillary works such as lighting and stormwater trenching have been considered as a part of the proposed works, however the potential archaeological impacts of these works are not clear in the assessment as trenching extends outside of the assessed study areas. Please update the HAA, including associated mapping, to demonstrate assessment of all works associated with the project. This should include: a. Reference to stormwater designs provided in Appendix K of the Submissions and Amendment Report, and trenching for lighting in Appendix BBB.	Heritage NSW	<u>Consideration of Stormwater</u> The proposed stormwater infrastructure works depicted in the stormwater design plans fall within areas that have been assessed as having low potential for archaeological remains. The stormwater infrastructure in the western car park is located in an area that has undergone prior disturbance and landscaping. The historical archaeological assessment, has identified this area as having low potential. No known historical elements (structures, features, or deposits) are mapped within or directly adjacent to this zone. Therefore, the risk of uncovering historical archaeology is considered likely negligible or a result of isolated finds. Within the eastern car park, the primary archaeological sensitivity relates to the potential remains of the Ha-Ha wall associated with the former institutional complex. However, the proposed stormwater works are shown to be outside the area of mapped or inferred Ha-Ha wall alignment. Given this location and the depth of proposed works indicated on the plans provided in Appendix K and Appendix BBB, the potential for encountering intact historical archaeological remains within the footprint of the stormwater works is low. <u>Consideration of Lighting</u> The lighting alignment extending south from the western carpark does not intersect with any areas mapped as containing potential archaeological resources within this location. This section of works is outside the zone of historical potential, and as such poses little to no archaeological risk. The lighting trench also extends southward from the eastern carpark and may potentially cross the mapped alignment of the ha-ha wall.

		The ha-ha wall's potential remains are predicted to survive at depths greater than 1–1.5m, if at all, due to landscaping and disturbances. The lighting works are not expected to result in significant subsurface impacts, as they typically involve narrow trenches (225–375 mm) and shallow excavation (≤600 mm in depth). This would likely avoid any deep intact archaeological remains. However, they could intersect with the slope or mound of the ditch infill (if it survives at higher levels).
b. Further assessment of the proposed borrow pits, noting that these works are likely to result in a requirement for additional excavation.	Heritage NSW	It is acknowledged that the original proposed location of the borrow pit in the eastern car park area had potential to intersect with the predicted alignment of the former ha-ha wall. Following further internal review and consideration of the archaeological constraints identified in the HAA the design team has revised the location of the borrow pit to minimise potential ground disturbance within areas of archaeological sensitivity. The revised location now avoids the area of the eastern car park where the ha-ha wall may have been present, based on historical mapping and topographic features. This amendment aims to reduce the likelihood of impacting any subsurface remnants associated with the ha-ha wall. While the potential for survival of structural remains is assessed as low with moderate potential at depth due to historical ground disturbance in the area, the relocation of the borrow pit is an additional heritage mitigation measure to further minimise impact. It is recommended that an archaeologist be present during excavation works to monitor for any potential finds and to implement the Unexpected Finds Protocol. Any findings of potential archaeological significance will require a stop-works protocol, be recorded and reported to Heritage NSW in accordance with the site's heritage management framework.

		 Figure 10 Draft layout of new borrow pit configuration (purple) in relation to previous (yellow) and potential alignment of the Ha Ha wall (pink) Source: Curio, Douglas Partners & TTW 2025
The assessment of archaeological potential for the eastern carpark differs between the HAA authored by Curio, and the assessment authored by AMBS attached as Appendix B to the HAA. The Curio assessment identifies very low to low potential for remains associated with the Ha Ha walls to be present, and assesses any potential remains as being of local significance. The AMBS assessment identifies low to moderate potential for remains of the Ha Ha walls within the uppermost 1m of the soil profile, and similarly assesses any potential remains as being of local significance. Please clarify the discrepancy in assessed potential for the Ha Ha walls between the Curio and AMBS assessments. Heritage NSW notes that archaeological potential is likely to increase toward the base of the feature, as deeper archaeological deposits are less likely to have been impacted by later works.	Heritage NSW	Following a re-review of the AMBS and Curio assessments, it is acknowledged there is a discrepancy in the stated archaeological potential of the ha-ha wall within the eastern car park area. Curio's original assessment indicated a very low to low potential, which may have underestimated the likely depth and character of survival. The AMBS report, while broadly consistent in acknowledging low-moderate potential, presented some internal inconsistencies in its wording. For instance, on one hand, the report notes that "remains are more likely to survive at depths below 1-1.5 m", which aligns with the contextual understanding of extensive fill and earthworks in the 1990s. However, it also references potential survival "<i>within the uppermost metre</i>" within the same assessment, creating some confusion as to where significance and preservation are most likely to be expected. Both, however, agree that any intact structural remains, if present, are more likely to exist at greater depths below the modern surface due to extensive works undertaken in the 1990s. Upon review, Curio proposes to standardise the assessment to low archaeological potential, with the possibility for moderate survival at depth, particularly where ground disturbance may have been less intensive. This reflects:

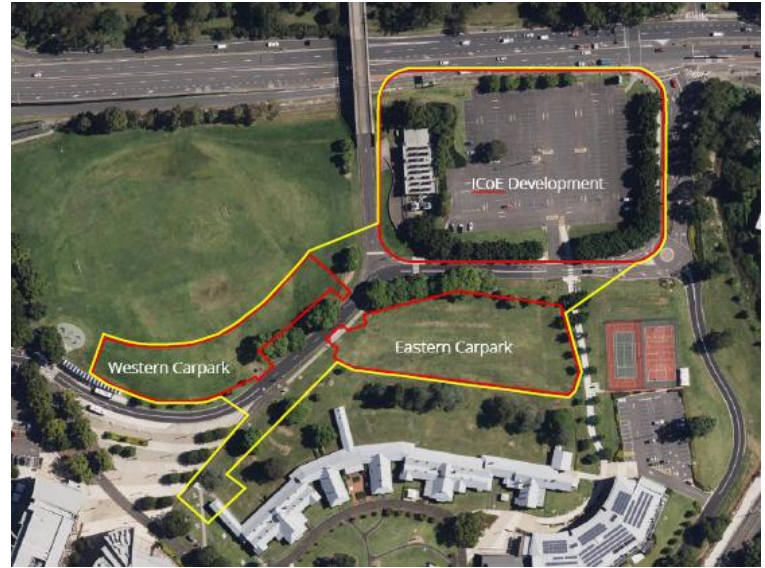
		• The presence of terracing aligned with historical imagery of the ha-ha wall, suggesting potential remnants of the feature may survive beneath current ground level. • The uncertainty about the depth and extent of 1990s earthworks, which may have impacted or preserved buried structural remains depending on methodology and material use. • The exact depth and degree of previous disturbance is unknown due to the lack of detailed records regarding the extent and method of 1990s site regrading, trenching, and service installation. • The topographic expression of two distinct slopes in the eastern car park, which may correspond to the wall and ditch components of the ha-ha. • Analogous findings at Cumberland Hospital, where intact ha-ha remains were found unexpectedly at depth on one side, while entirely removed on the other. The AMBS statement that “remains are more likely to survive at depths below 1–1.5 m” on page 33 is supported by contextual topography and the extent of landscaping fill. However, some wording a few paragraphs later does create some confusion, as they reference survival potential “within the uppermost metre”. <u>Revised Archaeological Potential</u> Structural remains of the ha-ha wall, if present, are most likely to be located at depths from 1–1.5 m below current ground level. The uppermost metre has likely been disturbed to some capacity by late 20th century redevelopment and landscaping.
The HAA and its appendices assess potential archaeological remains associated with the Ha Ha walls as locally significant. Heritage NSW notes that the significance of the Ha Ha walls would be connected with their historical and aesthetic values as well as research potential. Substantially intact and interpretable remains associated with the Ha Ha walls could contribute to the state significant landscape of the item and act as a demonstrators of the evolution of attitudes toward institutional care. Please update the HAA to provide a more detailed assessment of the potential significance of the Ha Ha walls.	Heritage NSW	Heritage NSW’s comments regarding the potential significance of archaeological remains associated with the ha-ha wall are acknowledged. Both Curio and AMBS have assessed any potential subsurface remains of the ha-ha walls as being of local significance, primarily due to: • The potentially low grading of archaeological potential for intact remains to survive within the current study area, based on historical landscape modifications, and previous potential development impacts. • The possibly fragmentary and likely disturbed nature of any surviving structural elements, as informed by comparative assessments However, in light of Heritage NSW's request and the broader heritage context, it is agreed that a more nuanced discussion of potential significance is warranted. While both reports initially assessed any surviving remains as locally significant, Curio accepts that the Ha Ha wall's original function, design, and contribution to institutional

		landscape planning, as well as its connection to evolving attitudes toward psychiatric care, could contribute to State-level significance, if substantial, intact and interpretable remains were recovered. <u>Revised Assessment of Significance</u> • The historical and aesthetic values of ha-ha walls are acknowledged as part of the broader institutional landscape design of 19th-century asylums. These structures were deliberately constructed to obscure physical barriers and reflect evolving philosophies of care for patients, making them symbolically and functionally significant. • Should archaeological remains of the ha-ha wall be uncovered within the study area, and those remains are found to be substantially intact, clearly interpretable in form, and retaining defining architectural characteristics, there is potential for them to be assessed as having State heritage significance. This would be due to: - Their ability to contribute materially to the understanding of institutional landscape design; - Their potential to demonstrate the evolution of mental health care and social attitudes; - Their associative value with a <i>State-listed heritage item</i> (the broader precinct including the Female Orphan School and Rydalmere Hospital). • Conversely, if the remains are highly fragmentary, heavily modified, or difficult to interpret, their significance is more likely to remain at a <i>local level</i>, representing a minor contribution to the understanding of the broader landscape. At this stage, any surviving elements of the Ha Ha wall are predicted to be fragmentary, buried at depth, and of local significance. However, in the event that substantial, intact sections of the wall and associated ditch are encountered, particularly in an interpretable configuration, the significance may be reassessed as State level, given the Ha Ha's potential contribution to the broader cultural landscape of the former Rydalmere Hospital and its association with mental health care history in NSW.
Heritage NSW notes that the proposed works may result in direct and irreversible impacts to areas of archaeological potential within the footprints of the carparks despite the proposed car parks being temporary in nature. Please ensure that following revision to address the matters outlined above, the HIS, HAA, and Archaeological Research Design and Excavation Methodology (ARDEM) provide: a. A clear and robust assessment of archaeological impacts, including consideration of options to avoid or minimise impacts.	Heritage NSW	Archaeological Potential <u>Western Carpark</u> • Archaeological assessment confirms that the western area has low potential for historical archaeology. • There is no mapped archaeological features or likelihood of buried structures within the boundary of proposed works.

		- No further archaeological assessment or monitoring is required for this portion of works. <u>Eastern Carpark:</u> - The only identified area of archaeological potential is the alignment of the Ha Ha wall, associated with the former institutional landscape. - While Curio and AMBS varied slightly in potential rating, both agree: - Survival of intact structural remains is unlikely within the upper 1 m due to prior 1990s earthworks. - Any surviving remains would likely exist at depths >1-1.5 m, beyond the excavation footprint for most services (e.g., trenching for lighting and pavements). Avoidance and Minimisation Measures Undertaken To proactively avoid and minimise potential impacts, the following design adjustments and protective strategies have been undertaken: Borrow Pit Relocation: The proposed borrow pit within the eastern carpark was originally located in proximity and likely crossing over the Ha Ha wall alignment. It has since been relocated further north, away from this alignment, to avoid the area of potential archaeological sensitivity. Shallow Service Alignments: Proposed lighting trenches and stormwater are generally proposed at shallow depths (<600 mm) and have been routed way from the mapped Ha Ha wall where possible. Limitation of Deep Ground Disturbance: Pavement and surface levelling for the temporary carparks are designed with cut-fill balancing to avoid deep excavation across the entirety of the carparks. In most areas, the construction involves minimal subgrade disturbance.
b. Where relevant, updated mitigation measures based on the above.	Heritage NSW	While the temporary car park construction will result in varying degrees of surface ground disturbance, all efforts have been made to ensure: - Works are targeted away from known or predicted archaeological resources. - Depths of impact are relatively shallow and unlikely to intersect with deeply buried features. - Where residual risk exists, monitoring and management frameworks are in place to ensure no irreversible damage occurs without appropriate archaeological oversight.

		This approach aligns with the principles of best practice heritage management under the NSW <i>Heritage Act 1977</i> and demonstrates a clear commitment to avoidance and minimisation before mitigation. Given the residual potential for encountering historical resources, especially near the eastern Ha Ha alignment, the following is proposed: • Archaeological Monitoring Program: - Monitoring of lighting trenching, drainage and borrow pit associated works in the vicinity of the mapped Ha Ha wall. - Monitoring would be non-invasive unless archaeological materials are encountered. - Investigative works in consultation with Heritage NSW undertaken should archaeology be identified and formulation of a site-specific response (recording, avoidance, salvage, etc.). • Unexpected Finds Protocols: - In the event of archaeological discovery across the rest of the study area, works will stop and be managed under the approved unexpected finds procedures, including notification to Heritage NSW and formulation of a site-specific response (recording, avoidance, salvage, etc.)
Please update the ARDEM to address the following matters: a. In the 'Response to Triggers' section, please define in which situations it would be relevant to notify Heritage NSW.	Heritage NSW	Some examples have been provided in the Response to Triggers section of the ARDEM, including: • Stone footings, brick walls, or foundation trenches • Wells, cisterns, cesspits, or drainage channels • High densities of artefact deposits (not isolated finds) • Yard/agricultural land modification features If any features are identified during monitoring, Heritage NSW will be notified, along with either a proposed methodology for recording and/or investigation and to seek additional advice depending on the nature of the find.
b. In the 'Open Area Salvage Excavation' section, it is noted that provision is made for an additional salvage methodology to be produced where salvage excavations are required. Please update this section to include a requirement that any salvage methodology must be approved by the Department of Planning, Housing and Infrastructure (DPHI) in consultation with Heritage NSW prior to implementation.	Heritage NSW	This request has been included within the ARDEM as a part of the methodology.
Aboriginal Archaeology		
Clarification is requested regarding the impact assessment in Section 6 of the revised ACHAR. Section 6.2.3 states that trenching for services (e.g., lighting) is part of the proposed works for the Western and Eastern Car Parks. Appendix BBB (Lighting and Electrical Drawings Spees) of the	Heritage NSW (Aboriginal)	Following review of the Lighting and Electrical Drawings & Specifications (Appendix BBB), it is acknowledged that some new electrical service alignments (e.g., cabling for light poles, SIPs, ELPs,

Submissions and Amendment Report also shows that new electrical cables for car park lighting will be installed in areas outside the current study area boundary shown in the revised ACHAR. Accordingly: a. Please confirm whether the revised ACHAR has assessed all potential impacts from service trenching works.	Cultural Heritage)	and CCTV infrastructure) are located beyond the primary footprints of the ICoE development area and the two temporary car park zones. In light of this, Curio has reviewed the electrical trenching and pole installation locations shown in Appendix BBB (specifically drawing SV_E2000) against the archaeological potential of adjacent areas. These include small-scale linear works such as: • Shallow trenching along the peripheries of the existing car parks (e.g., along footpaths and grassed verges) for new lighting poles and associated cabling. • Service connections extending south of the defined study area, near previously disturbed or landscaped zones. These proposed works are not expected to result in significant subsurface impacts, as they typically involve narrow trenches (225–375 mm) and shallow excavation (≤600 mm in depth). Moreover, the majority of these areas have previously been subject to landscaping, services installation, or cut-and-fill activities during prior site development (including the construction of the university oval, access roads, and drainage infrastructure). While these areas fall outside the original study area boundary as shown in the ACHAR, the works themselves are low-impact and located in areas assessed as highly disturbed or low in Aboriginal archaeological potential. Based on the understanding of this area of the study area, no Aboriginal archaeological sites or sensitive landforms are likely to be affected.
b. Please update the study area boundary on the mapping to include all areas requiring ground disturbance that have been assessed in the revised ACHAR.	Heritage NSW (Aboriginal Cultural Heritage)	Refer to the Figure 11 below, which has also been reproduced within the Curio Heritage RTS Response and illustrates the updated study boundary with red outline representing the development area and the yellow outline representing the extent of all proposed works within the study area boundary.

		 Figure 11 Amended study boundary. Source: Curio 2025
Please update the list of RAPs in Section 3.3.1 of the Revised ACHAR to include Widescope Indigenous Group and Wurrumay Pty Ltd consistent with these organisations having submitted registrations of interest in the project and having been consulted.	Heritage NSW (Aboriginal Cultural Heritage)	This has been amended in Section 3.3.1 of the Revised ACHAR (dated October 2025).
Please update Section 3.6 of the revised ACHAR to include the outcomes of all consultation with RAPs subsequent to the exhibition of the EIS.	Heritage NSW (Aboriginal Cultural Heritage)	The approach for RAP consultation in regards to the revised project was discussed with Heritage NSW prior to undertaking. A relevant email screenshot is provided in Appendix A of the revised ACHAR. For ease of the organisation of this agreed approach, Section 3.6 of the revised ACHAR collates all interactions with RAPs as they were updated of the project changes. A site visit was also organised within the 28 day review period for the draft ACHAR report and both written correspondence and in person comments are collated in the one table.
The ACHAR states that a project update was sent to RAPs in May 2025. Please provide evidence that this was sent to all RAPs (i.e. a copy of the email with all relevant email addressed shown).	Heritage NSW (Aboriginal Cultural Heritage)	Curio was notified of the project update in May 2025. RAPs were notified on 31 July 2025, after Curio consulted with Heritage NSW on the best approach to update the RAPs for the project in line with consultation guidelines. Evidence of this email correspondence, as

		well as the letter that was prepared to provide additional information to RAPs has been attached to Appendix A: of the revised ACHAR
Please provide evidence that the revised ACHAR was sent to all RAPs for review and comment (i.e. a copy of the email with all relevant email addressed shown).	Heritage NSW (Aboriginal Cultural Heritage)	RAPs were notified on 31 July 2025, after Curio consulted with Heritage NSW on the best approach to update the RAPs for the project in line with consultation guidelines. Evidence of the email correspondence is also included the revised ACHAR. Discussions were undertaken on site with the RAPs on 20 August 2025. The collective RAP feedback is demonstrated in the table in Section 3.6 of the revised ACHAR.
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.	COP	Whilst Council's position is understood, it is proposed to retain the pipe in situ with a best-practice protection and access solution that achieves the underlying objectives of section 4.5 of Council's Development Engineering Design Guideline (2018), namely: safe maintenance access, long-term asset protection, risk minimisation to the building and public, and safeguarding of a compliant overland flow path up to the 1% AEP event with climate change. To ensure the stormwater asset is maintained, a services plan clearly mapping all public and private stormwater assets, ownership, and access paths will be provided with the final occupation certificate, along with the final protection slab and pit details.
Remediation of carparks and borrow pits		
- It is noted that borrow pits are proposed in both temporary carparks for storage of asbestos containing materials (ACMs) disturbed during construction. Noting that the carparks would be temporary, we recommend that the Department require the proponent to confirm that the borrow pits would be compatible with the future removal of the carparks and remediation of the landscape. - The proposed borrow pit in the eastern carpark would overlap the infilled Ha Ha. We strongly recommend that the borrow pit be relocated so that it is well clear of the Ha Ha.	Heritage NSW DPHI	The general sequence of remediation will be determined by the Remediation Contractor with the aim of minimising the potential for cross contamination of 'clean' areas/soils with contaminated soils. This should include avoiding, wherever possible transporting or placing contaminated soil over 'clean' areas separating stockpiles of different origin/contamination profile and validating the complete removal of any contaminated material placed/potentially impacting 'clean' areas. The general sequence of remediation should consider the following recommended sequence: - Task 1: Borrow pit construction - Task 2: Excavation of confirmed asbestos contaminated soils (fill Category 1 and 2) and placement into the Borrow Pit - Task 3: excavation and further assessment of the remaining fill for asbestos

	• Task4: Placement of additional identified asbestos impacted fill into the Borrow Pit • Task 5: off-site disposal of excess soil (contingency – if required) • Task 6: Capping of asbestos impacted fill. <u>Task 1: Borrow Pit Construction</u> Indicatively the borrow pit in the western carpark is anticipated to manage fill Category 1 (fill above the SAC), and potentially some Category 2 fill (fill below the SAC). The second borrow pit in the eastern carpark may potentially be required subject to the actual volume of asbestos material requiring management (refer Task 2). Therefore, this task may be commenced in parallel with Task 2. For preparation of the borrow pit as a future area to manage asbestos contaminated soils on-site the following sequence is to be undertaken: • Revise the estimated borrow pit volumes based on the actual volume of asbestos requiring management in consultation with the Environmental Consultant. Further investigation may be conducted as required to provide a better estimate of volume of fill to be placed in the borrow pit(s). Construction of a second borrow pit (i.e. eastern carpark) may be staggered to allow for management of additional material if the volume of the first borrow pit is exceeded. Placement of the borrow pit should also consider any further input from the archaeological consultant. • Survey the extent of the proposed borrow pit(s). • Excavation of soils to the nominated depth: - Overlying fill is to be separated and stockpiled separately to the underlying natural soil. The fill is to be assessed / classified by the Environmental Consultant for potential on- or off-site re-use or disposal in accordance with Section 13; - Surplus natural soils are to be stockpiled separately to the overlying fill. The natural soils are to be assessed / classified by the Environmental Consultant for potential on- or off-site re-use or disposal in accordance with Section 12 (on-site re-use) and 13 (off-site disposal); and - Additional assessment, if required, to assess suitability for beneficially re-use (e.g. geotechnical requirements for pavements). • Survey the depths at the base of the borrow pit.
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	- Line the walls and sides of the borrow pit with a marker layer meeting the requirements of Section 11.1 outlined within the Remediation Action Plan. Depending on the total depth of the borrow pit, additional consideration should be given to the excavatability of the material, and requirements to safely bench / shore the excavation. Per the geotechnical investigation undertaken for the ICoE (Douglas, 2024b), it was recommended that where space permits, batter slopes for un-surcharged slopes above the groundwater table not higher than 2m should be constructed no steeper than 1.5H:1V (horizontal: vertical) in the temporary case, and 2H:1V in the permanent case. <u>Task 2: Excavation and Management of Fill Category 1 and 2</u> This task preferably to be undertaken following excavation of the borrow pit to facilitate direct relocation of contaminated soils. The general process is therefore: - Review of all WHS requirements to manage asbestos during the works by the Asbestos Contractors and licenced asbestos assessor (LAA), and incorporation of these requirements into the works methodology. - Relocation of Category 1 fill with an initial lateral extent of 10 m, or up to the nearest test location without asbestos detected. Excavation should be undertaken under supervision by the Environmental Consultant to inform the depth and lateral extent. The depth of excavation should consider the following excavation to the depth of the fill layer in which the asbestos was identified: - TP8 – to depth of 2.3 m; and - TP12 – to depth of 1.0 m. - Depending on available space in the borrow pit relocation may also be similarly considered for TP22, TP7 (and material within the site near TP9 and TP10 as identified within the Remediation Action Plan) based on risk of further asbestos finds. Noting the requirements to determine suitability as subgrade material the material from these locations can be visually assessed by the Environmental Consultant to determine if direct relocation may reduce unnecessary testing (i.e. if further ACM is identified). Otherwise, category 2 fill is to be assessed as part of the overall sequence in Task 3. - Excavated fill is to be temporarily stockpiled on a physical separation layer, or directly loaded into plant to place in the borrow pit; and
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		• If required, temporarily cover the borrow pit with a physical barrier (e.g. geofabric) after placement / between shifts. <u>Task 3: Excavation and Validation of Remaining Fill</u> For remaining areas: • Stripping of fill to the DSL. • Separate and stockpile into the following: - Topsoil fill; - General fill with building debris inclusions; and - General fill with no building debris inclusions. • Assessment of stockpiled fill by the Environmental Consultant where the stockpiled materials are proposed to be re-used on-site in accordance with Section 12.4, or otherwise in accordance with Section 13 to facilitate off-site disposal. Testing of stockpiled soils for site suitability will include testing of the following at an initial rate of 1 per 25m³ as per NSW EPA (2022) including: - Field assessment of asbestos by screening 10L bulk samples through a 7mm sieve; and - Laboratory analysis for AF/FA. If suspect asbestos materials are identified then field testing may be halted, if desired, and the material treated as asbestos contaminated. In this regard, an initial reduced frequency may be recommended by the Environmental Consultant to 'triage' the fill material based on risk of additional asbestos finds. • Inspection of the base of the excavation by the Environmental Consultant (this may be conducted progressively in sub-areas if required by the excavation programme). If fill remains at the DSL then validation testing in accordance with Section 12 is to be undertaken on the retained in-situ fill material, to depths of up to 2m (or reaching natural soils, whichever is shallower). Where natural soils are encountered, surficial validation testing is considered sufficient: - Fill which does not meet the RAC (refer Section 11) will require further excavation as recommended by the Environmental Consultant. This indicatively could require excavation to the nearest test locations meeting the RAC. <u>Task4: Capping of Asbestos Impacted Fill</u> Following completion of Tasks 1 to 3 a borrow pit(s) is to be capped for long term management of the asbestos contaminated soils. If there is insufficient space in the borrow pit (or if the borrow pit is not constructed), or required due to the project programme, excess / contaminated soil may be disposed of off-site.
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Structural Integrity		
The letter from TTW appended to the FIRA titled “SSDA – Structural Integrity During a PMF Event” states that “Minimal debris is expected to impact the structure”. CPHR does not agree with this statement as the local environment includes Victoria Road, and it should be expected that cars and other large debris such as trees would be mobilised in the event of a PMF. CPHR recommendation The FIRA should consider debris loads. The consent authority may consider a peer review of the structural integrity assessment and whether an assessment of buoyancy forces is required.	CPHR	The structural design of the building has been devised to withstand the PMF flood event.
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.	COP	The podium terraces have been deleted from Levels 2 and 3. A Tree Management Plan has been provided within the updated landscape plan package which demonstrates which trees will be retained and protected. Noted – refer to Mitigation Measures Table.
Water supply, take and licensing		
The Department of Planning, Housing and Infrastructure (DPHI) should request the proponent to quantify the maximum annual volume of water take due to aquifer interference activities and demonstrate the ability to acquire sufficient water entitlement unless an exemption applies. <i>Explanation</i> Insufficient information has been provided to confirm the potential groundwater inflow volumes. The RTS refers to the original Geotechnical Report provided at the EIS, restating that excavations are not expected to intercept groundwater. The deepest excavation to 5.8m AHD will however intercept the shallowest water table reported to at 6.5m AHD. Therefore, the conclusion is not supported by the data. Piling is described down to minus 2m AHD (approx. 8 m below the water table) and a statement is made that take will be 0.1 ML, without any supporting evidence. Evidence must be provided to substantiate this claim.	NSW Department of Climate Change, Energy, the Environment and Water – Water Assessment	Simple analytical calculation using Marinelli and Niccoli (2000) solution was undertaken to quantify the potential groundwater take for the OSD tank excavation. The following assumptions were made: • The dimensions of the OSD tank are 19.2m x 6.4m (as per architectural drawings). • The OSD tank requires excavation to 2.5m depth (conservative). • The water table is at 1.5m depth (conservative). • The hydraulic conductivity of the soil is 1×10^{-6} m/s (high-end of literature value for a sandy clay). • The soil is homogeneous. • Construction of the OSD tank will take 12 weeks. Based on these assumptions, the predicted groundwater take is about 2m³/day, i.e. a total of approximately 0.2ML over a 12-week period.
Groundwater impacts and dewatering requirements		

If the take of groundwater is found to be greater than 3 ML per year, DPHI should request the proponent to assess impacts due to aquifer interference activities in accordance with the NSW Aquifer Interference Policy and framework (2012). As per Recommendation 1.1 above, the EIS has not provided a volumetric quantification of groundwater take. Additionally, the EIS has not provided an assessment of impacts to groundwater due to construction or operation of the project. NSW DCCEE Water Group notes that without groundwater take estimations it is difficult to assess the level of risk. Therefore, the proponent should determine the estimated take volume.	NSW Department of Climate Change, Energy, the Environment and Water – Water Assessment	No basement levels are proposed as part of the development. Proposed cuts are shallow (up to approximately 1.2m below ground level) and are therefore not expected to intersect the water table, which was encountered at around 2.0m depth on average, rising to approximately 1.4 m following heavy rainfall events. Long-term interception of groundwater is therefore not anticipated. During construction, excavations will be limited to utility trenches, building foundations, and the OSD tank. Minor, temporary groundwater seepage may occur during these works; however, such inflows are expected to be minimal. Given the cohesive and low-permeability characteristics of the alluvial soils, seepage volumes are likely to be minimal (if any) and readily managed using conventional sump-and-pump methods. No registered groundwater bores or GDEs occur in the vicinity of the site (Section 2.4). Therefore, no impacts on groundwater receptors are anticipated. Any groundwater seepage collected during construction will be managed in accordance with the Protection of the Environment Operations Act 1997 (POEO Act). Any discharge to the environment will comply with the Australian and New Zealand Guidelines for Fresh and Marine Water Quality (ANZG, 2018).
Mitigation Measures Table		
Provide a revised Mitigation Measures Table that consolidates all commitments should the project be approved. The table must include any additional mitigation measures from the updated technical documents.		A revised Mitigation Measures Table has been provided under separate cover.

6.0 Further Assessment of Amended Project

The following section provides further environmental assessment undertaken in respect of the project, including as a result of the project amendments outlined in **Section 4.0** and the submissions discussed in **Section 5.0**.

6.1 Strategic and Statutory Context

Since SSDA lodgement, there have been no relevant changes to the strategic or statutory context that would affect the site or the proposed development. For completeness, the project's key statutory assessment is outlined in Appendix C of the EIS in the Statutory Compliance Table.

6.2 Built Form

Section 4.1 outlines the architectural changes made to the proposed development and the rationale behind them. Updated Architectural Drawings and a revised Design Report have been appended to this submission, illustrating the modifications.

The proposed changes represent refinements to the ICoE built form previously assessed and deemed acceptable in the publicly exhibited Environmental Impact Statement (EIS) and subsequent Amendment Report. Where internal floorplate layouts have been adjusted, the changes either maintain the outcomes of earlier assessments or result in reduced environmental impacts and improved functionality and user experience benefits.

A key revision involves the deletion of the fourth storey of the building and reduction in the ground floorplate, resulting in greater separation to the Melaleuca tree and overall site boundaries. **Section 6.2.1** below addresses any potential visual impacts associated with this design change.

6.2.1 Visual Impacts

An updated Visual Impact Assessment (VIA), included in **Attachment AA**, has been prepared to address the massing of the building. The revised VIA includes additional photomontages and a written assessment evaluating whether the development maintains an appropriate visual relationship with surrounding sites, when compared to previous iterations of the proposed development.

As the proposal seeks to reduce the overall building envelope, the conclusions provided within the last assessment are consistent with the previous assessment. Overall, the updated VIA concludes that the revised proposal maintains an appropriate built form relationship with its surrounding context. The VIA summarises that, while visible, the proposed car parks will have a low significance of visual impact on State heritage listed buildings, and on the WSU campus oval. Additionally, it concludes that the proposal does not alter the original findings or conclusions of the exhibited EIS and amended SSDA.

6.3 Traffic and Parking

An amended Transport and Accessibility Impact Assessment has been prepared by TTW in response to the amended proposal however, the conclusions from the previous assessment remain the same and there are no increased traffic or parking impacts from the proposal.

City of Parramatta have provided recommended traffic conditions which have been incorporated into the mitigation measures.

6.3.1 Temporary Car Parking Strategy

Parramatta South Place Strategy

The eastern and western car parks are proposed to be temporary and anticipated to be in place until a more permanent arrangement for car parking is developed. This arrangement is an interim solution to ensure that heritage impacts are minimised and a longer-term solution is found which prioritises the heritage and conservation values of the CMP.

As a long term solution, the *Parramatta South Place Strategy* is currently being prepared by Hill Thalys in collaboration with Sasaki, on behalf of Western Sydney University. This strategy will provide a comprehensive,

high-level strategic framework for future planning and development of the Parramatta South Campus, aligning with the University long-term strategic goals. Further details underpinning the development of this Strategy is provided within the Parramatta South Temporary Carpark Strategy prepared by Western Sydney University and provided at **Appendix JJ**.

The Strategy will adopt a principles-based approach to land-use planning, urban design, and transport, ensuring that the University's development objectives are met over the next decade. A critical component of the Parramatta South Place Strategy will be a comprehensive review of all transport options to and from the campus. This review will include both existing and evolving sustainable transport options to ensure that the campus is well-connected and accessible, while minimising reliance on private car use. As the campus grows, future transport solutions will be prioritized to enhance sustainability and reduce the environmental footprint of commuting. Further, previous masterplans completed for the campus have considered various options to consolidate parking on site and will be explored further the campus continues to evolve.

The Place Strategy will align with the University's future capital works program for the Parramatta South Campus. The strategy will be informed by updated Conservation Management Plans and Landscape Management Plans, ensuring that all proposed developments respect and preserve the heritage values of the site. These updated plans will ensure that heritage impacts are carefully managed and that development supports the ongoing preservation of significant cultural landscapes. The timeframe for the delivery and endorsement of the Parramatta South Place Strategy is Q1 2026. Additional information on the delivery of the temporary car park is also provided within Table 7.

6.4 Flooding

GRC Hydro has reviewed the feedback provided by DPHI, NSW Department of Climate Change, Energy, Environment and Water (CPHR and Water), NSW SES, City of Parramatta, and has subsequently prepared a revised Flood Impact Risk Assessment (FIRA) and a revised Flood Emergency Response Plan (FERP) (refer to **Attachment K**).

The updated modelling includes impacts of the amended development at the 5% AEP flood event and the Probable Maximum Flood (PMF). This modelling has also factored in climate change based on a 1% AEP event that incorporates a loading to emulate present-day climate change. Overall, this updated design remains consistent, and compliant with the flood-related controls and objectives of local planning instruments.

Additionally, GRC has accepted agency guidance on the preference for evacuation and has amended the FERP to include provision for an early evacuation trigger based on if a BoM severe weather (rainfall) or severe thunderstorm warning is issued, if the estimated daily rainfall exceeds 100 mm. These warnings will also trigger an email/text request that would-be occupants (students, staff or guests) should stay away from the site if flooding is predicted. Shelter-in-Place has been retained as a residual safety measure in the event that some occupants find themselves at the site if flash flooding occurs after they've been advised to evacuate. These measures have been adopted within the mitigation measures table.

6.5 Heritage Impacts

6.5.1 Heritage post-European Settlement

An updated Heritage Impact Statement has been prepared by Curio and is provided at **Attachment S**. The updated assessment takes into consideration the matters raised by DPHI and Heritage NSW with respect to heritage impacts on the wider site, including a cumulative assessment of the revised proposal incorporating the temporary car parking elements. The HIS concludes as follows:

The proposed Indigenous Centre of Excellence (ICoE) will replace an existing car park with a state-of-the-art educational and cultural facility dedicated to advancing Indigenous knowledge, leadership, and reconciliation. The proposal reflects a sensitive and thoughtful approach to design, incorporating Indigenous-led architecture and native landscaping that is contextually responsive to both cultural and ecological heritage values. The building's scale, form, and material palette are sympathetic to its setting and clearly distinguishable from the adjacent heritage fabric.

The temporary car parks are located on open, previously disturbed land at the periphery of the heritage-listed campus. They have been sited and designed to avoid direct or indirect impacts on significant buildings, archaeological features, view corridors, or heritage landscapes. As temporary

interventions, the works are fully reversible and consistent with the conservation policies outlined in the site's Conservation Management Plan (CMP).

The revised HIS confirms that there will be no physical impacts on any significant heritage items within the vicinity, including the State Heritage Register-listed Rydalmere Hospital Precinct (former) (SHR No. 00749) and the locally listed "Wetlands" (Item I011). Visual impacts are considered neutral to positive, with the ICoE enhancing the aesthetic and cultural value of the site and the car parks having only minor, short-term effects.

Various recommendations including a photographic archival record, a Heritage Interpretation Plan and landscape and signage strategies are incorporated within the revised mitigation measures provided at **Appendix B**.

6.5.2 Aboriginal Heritage and Historical Archaeology

Updated Aboriginal Cultural Heritage Assessment Report (ACHAR) and Historical Archaeological Assessment (HAA) have been prepared by Curio and are provided at **Attachment Q** and **R**). The revised assessment undertaken has included a revised study area to include the lighting proposed to the south of the temporary car parks.

The reports undertake a comprehensive archaeological assessment of the subject area and concludes that the site sits within an area which is known for having the potential to preserve archaeological features and that the site has been through varying degrees of disturbance, impacting its archaeological potential in some areas. The assessment has also revised the assessment conclusions provided for the developments impacts on the Ha Ha walls, from having a very low to low potential of character survival to having a low archaeological potential of survival.

Various recommendations including archaeological testing, aboriginal cultural heritage site inductions, an Aboriginal Unexpected Finds Procedure and a Human Remains Procedure are incorporated within the revised mitigation measures provided at **Appendix B**.

6.6 Social Impact Assessment

The Social Impact Assessment (SIA) has been updated by GYDE following the completion of the public exhibition period and is provided at **Attachment EE**. The assessment includes updates to consider the cumulative impacts. There are no changes to the conclusion of the social impact assessment previously undertaken.

6.7 Contamination and Remediation

Additional Geotechnical Investigations and a revised Remediation Action Plan have been prepared by Douglas Partners (refer to **Attachment X & Y**). The amended information provides clarity around the remediation methodology surrounding the borrow pits. This strategy consists of a six-step process which involves:

- Task 1: Borrow pit construction
- Task 2: Excavation of confirmed asbestos contaminated soils (fill Category 1 and 2) and placement into the Borrow Pit
- Task 3: excavation and further assessment of the remaining fill for asbestos
- Task 4: Placement of additional identified asbestos impacted fill into the Borrow Pit
- Task 5: off-site disposal of excess soil (contingency – if required)
- Task 6: Capping of asbestos impacted fill.

These steps will ensure that the site is fit for purpose and meets the requirements provided by section 4.6, chapter 4 of *State Environmental Planning Policy (Resilience and Hazards) 2021*.

Importantly, all mitigation measures required to address contamination sources that may be present at the site are documented further in the Mitigation Measures (**Attachment B**) and are recommended so that risks remain low and acceptable.

6.8 Biodiversity

An updated Biodiversity Development Assessment Report (BDAR) prepared by Land Eco Consulting (**Attachment OO**) provides a consolidated ecological assessment for the entire SSDA project area. Key findings of this updated assessment include:

- The development will impact approximately 1.51 hectares of vegetation, primarily involving removal of nonindigenous native and exotic planted trees and exotic-dominated understorey vegetation.
- Most of the affected vegetation consists of high-threat exotic weeds or historically disturbed vegetation in poor condition, offering limited habitat value for threatened species.
- The report supports the use of the Atlantis Turf Cell system for the car park hardstand areas, allowing turf to be laid over topsoil. This approach helps to offset habitat loss by maintaining some ecological function on site.

6.9 Accessibility

An updated Accessibility Statement has been prepared by MGAC and is provided at **Attachment V**. It concludes that an accessible car parking space directly associated with the ICoE building is continued to be provided in the revised design and therefore maintains its ability to meet relevant requirements for accessible parking including the Disability (Access to Premises – Buildings) Standards (2010), Building Code of Australia (BCA) (2022) Part D4, F4, E3 and other relevant Australian Standards.

6.10 Building Code of Australia

An updated Building Code of Australia (BCA) Compliance Statement has been prepared by BM+G and is provided at **Attachment T**. The statement confirms that the revised proposal continues to be able to readily achieve compliance with the BCA.

6.11 Landscape

The Landscape Plans (as amended) prepared by Jane Irwin Landscape Architecture (JILA) is provided at **Attachment G & H**. The updated landscape design is generally consistent with the most recent proposal however, this design includes additional deep soil zones and provides a total deep soil area of 6,295m².

The proposed amendments are consistent with the WSUD strategy and site’s flood affection design requirements.

6.12 Wind

An updated assessment of the wind environment (provided at **Attachment CC**) has been prepared for the amended proposal. The finding of the assessment has concluded that whilst the proposed ICoE building will be slightly larger than most surrounding structures, the proposed development will have some effect on the local wind environment, though any changes are not expected to be significant from the perspective of pedestrian comfort or safety. Wind conditions around the majority of the development are expected to be classified as acceptable for pedestrian standing or walking from a Lawson comfort perspective and pass the safety criterion. The south-eastern courtyard, and Level 1 and 2 terraces are expected to have milder conditions, suitable for pedestrian sitting activities. Conditions on the north-west side of the site around the loading bay, the south-west entrance area and the outdoor function space on the east side of the building are expected to be subjected to windier conditions. These areas would require specific mitigation measures, such as local screening/planting if they are intended to be used for longer-term stationary activities.

6.13 Other Environmental Impacts

Table 8 summarises how the project amendments described in **Section 4.0** relate to the prior assessment of environmental impacts outlined in the EIS. **Table 8** should be read in conjunction with further assessment and clarifications provided in the response to submissions set out in **Section 5.0** of this report.

Table 8 Other Impacts

EIS Assessment Matter	Comment
Built Form and Urban Design	Refer to Section 6.2 and updated Design Report provided at Attachment F .
Landscaping	Refer to Section 6.5 and updated Landscape Plans provided Attachments G and H .

EIS Assessment Matter	Comment
Transport, Traffic, Parking and Access	Refer to Section 6.3 and updated report providing consolidated of traffic and parking impacts at Attachment M .
Heritage and Archaeology	Refer to Section 5.1, Section 6.5 and Attachments P – S .
Flooding	Refer to Section 6.4 and updated Flood Impact Risk Assessment and Flood Emergency Response Plan provided at Attachment K .
Tree Removal	No change from previous assessment.
Noise and Vibration	No change from previous assessment. An updated report with new project description is provided at Attachment U .
Pedestrian Wind	No change from previous assessment. An updated report with new project description is provided at Attachment CC .
Sustainability	No change from previous assessment. An updated report with new project description is provided at Attachment DD .
Contamination and Remediation	Refer to Section 6.7 and additional assessment reports provided by Douglas Partners at Attachments X and Y which specifically focuses on the remediation methodology.
Biodiversity	No change from previous assessment.
Waste Management	No change from previous assessment. An updated report with new project description is provided at Attachments FF and GG .
CPTED	No change from previous assessment.
Construction Traffic Management	No change from previous assessment. An updated report with new project description is provided at Attachment O .
Accessibility	No change from previous assessment. An updated report with new project description is provided at Attachment V .
Building Code of Australia / Fire Safety Engineering	Refer to Section 6.11 and updated BCA Report provided at Attachment T .
Social Impacts	No change from previous assessment. An updated report with new project description is provided at Attachment EE .
Contributions	No change from previous assessment.

7.0 Updated Project Justification

This section provides an updated justification and evaluation of the project as a whole, incorporating any relevant issues raised in submissions and the Applicant's response to these issues. Any design changes or assessments undertaken are in response to issues raised in submissions or further design development and have not increased the impact of the development. The design changes are minor in nature. As such, the justification for the project as previously outlined in the EIS is reiterated and strengthened through the presented responses which comprise meaningful amendments to the Proposal.

7.1 Ecologically Sustainable Development

The EP&A Regulation lists four principles of ecologically sustainable development to be considered in assessing a project. They are:

- The precautionary principle.
- Intergenerational equity.
- Conservation of biological diversity and ecological integrity.
- Improved valuation and pricing of environmental resources.

An analysis of these principles follows.

7.1.1 Precautionary Principal

The precautionary principle is utilised when uncertainty exists about potential environmental impacts. It provides that if there are threats of serious or irreversible environmental damage, lack of full scientific certainty should not be used as a reason for postponing measures to prevent environmental degradation. The precautionary principle requires careful evaluation of potential environmental impacts in order to avoid, wherever practicable, serious or irreversible damage to the environment.

This Submissions and Amendment Report has not identified any serious threat of irreversible damage to the environment and therefore precautionary principle is not relevant to the project. Therefore, there are no anticipated significant impacts on threatened species or threatened ecological communities and the threat of serious irreversible environmental damage.

Further, the proposal (as amended) will continue to deliver a high standard of ESD outcomes and initiatives at the site, as described above, and will minimise environmental impacts in areas of energy, water and materials efficiency. Proactive measures to prevent environmental degradation have been included within the design, construction, and operational phases of the new ICoE and its landscape. The contractor will implement environmental management plans during the construction phase and operational procedures of the development will actively pursue relevant targets to meet the relevant mitigation measures and mitigate or minimise potential environmental risks.

7.1.2 Intergenerational Equity

Inter-generational equity is concerned with ensuring that the health, diversity and productivity of the environment are maintained or enhanced for the benefit of future generations. The project (as amended) has been designed to benefit both the existing and future generations by:

- Implementing safeguards and management measures to protect environmental values.
- Providing a high level of sustainability and demonstrates responsibility in utilising passive design strategies that minimise the buildings environmental impact.
- Delivering new learning spaces for creative, research and knowledge-sharing programs that are Indigenous focused. This has the potential to improve life-long education outcomes for students to strengthen their Indigenous self determination.
- Nurturing the relationship between Indigenous communities and Western Sydney University to celebrate and showcase Indigenous culture, by providing dedicated educational, research and cultural facilities.
- Facilitating job creation and more widely supports the continuation of investment in tertiary educational facilities and supporting future enrolment capacity.

The project (as amended) has integrated short and long-term social, financial and environmental considerations so that any foreseeable impacts are not left to be addressed by future generations. Issues with potential long-term implications such as waste disposal would be avoided and/or minimised through construction planning and the application of safeguards and management measures.

7.1.3 Conservation of Biological Diversity and Ecological Integrity

The principle of biological diversity upholds that the conservation of biological diversity and ecological integrity should be a fundamental consideration. The proposal would not have any significant effect on the biological diversity and ecological integrity of the study area. As demonstrated in the original EIS, at Section 6.0 and throughout this Report, the proposed development will not result in any significant effect on the biological and ecological integrity of the study area, subject to the mitigation measures set out in **Attachment B**.

7.1.4 Improved Valuation, Pricing and Incentive Mechanisms

The principles of improved valuation and pricing of environmental resources requires consideration of all environmental resources which may be affected by a proposal, including air, water, land and living things. The cost of infrastructure, design measures, and other sustainability initiatives associated with the project (as amended) have been incorporated into the cost of the development and will be delivered in the most cost-effective way via a life cycle cost approach that provides best return on investment.

Energy-efficient design and using renewable energy sources reduce the building's operational costs and environmental impacts over its lifetime are at the core of the project's design ethos and proven through its Country-centric design approach. Overall, the project (as amended) addresses the principles of ecologically sustainable development through its commitment to energy efficiency, renewable energy, passive design strategies, avoidance of fossil fuels and toxic materials and pursuit of a high sustainability rating and respect for the land.

7.2 Likely Impacts of Development

Having regard to the natural environment, built environment and economic and social impacts of the proposed development, the likely impacts of the development (as amended) are considered acceptable as outlined in the following sections.

7.2.1 Natural and Built Environment

The proposed development (as amended) has demonstrated that the proposal adopts appropriate management strategies and will generate limited environmental impacts, due to the proposed mitigation measures and the design of the development.

All potential environmental impacts are thoroughly addressed in the EIS and Section 6.0 of this Submissions and Amendment Report.

7.2.2 Social and Economic

An assessment of the likely social impacts of the project has been undertaken in the updated Social Impact Assessment at **Attachment EE**, prepared in accordance with DPHI's *Social Impact Assessment Guideline 2023*. The assessment confirms that the proposal has the potential to result in both positive and negative impacts. The identified negative impacts are primarily short-term related to completing construction activities on the site and have informed mitigation measures at **Attachment B**. The identified positive impacts range from short-term to long-term and will impact new students, First Nations communities and the wider University via improved tertiary education offerings and a commitment to Indigenous learning and self-determination.

In addition, the ongoing construction phase of the project will support approximately 340 construction jobs and approximately 150 ongoing jobs in operation (full time equivalent). Overall, the SSD will ensure positive social outcomes for the broader WSU community subject to the implementation of the amended mitigation measures at **Attachment B**. Investment in WSU's academic offering and creating a place that is comfortable for Elders to be in and navigate Indigenous learning, teaching and cultural expression will provide widespread, significant and long-term benefits.

7.3 Suitability of the Site

Having regard to the characteristics of the Site and its location, the proposed development (as refined and amended) remains suitable for the site in that:

- The site is zoned SP2 under the Parramatta LEP as educational establishment, which seeks to protect and enhance existing educational facilities, and the project will meet the objectives for this land use zone.
- It will support future development within the Campus, including mitigating any potential traffic generation impacts.
- The site is of sufficient size to accommodate new built form, car parking and open space areas.
- The site is located within the heart of Parramatta and therefore is ideally positioned to host a 'destination' development that contributes to the local and wider community.

7.4 Public Interest

The proposed development remains in the public interest as it:

- Will deliver significant social, cultural and economic benefits to the local and greater Sydney and NSW community by providing new educational and cultural infrastructure that will support learning programs and research, providing enhanced opportunities for collaboration between Western Sydney University, community, and Indigenous stakeholders. This has the potential to improve life-long education outcomes for students and thereby supporting long term social and economic wellbeing.
- Supports and aligns with the broader strategic opportunity to provide enhanced high-quality tertiary educational facilities.
- Represents the economic and orderly development of land that will retain the existing core function of the campus and renew and enhance the existing facilities.
- Provide an additional approximate 490 jobs in both the construction and operational stages of development.
- Was the subject of a voluntary design excellence competition process which ensured a high-quality built form and landscape design that achieves design excellence and contributes to the architecture of the wider Western Sydney University Parramatta South Campus and Greater Sydney.
- Provides opportunities to better integrate with its surrounds including enhanced connections to the nearby light rail stop, to support the activation and uses of these spaces and destinations.
- Identifies the desire to achieve a high level of environmental performance, as well as measures that promote and support the uptake of sustainable transport options, and design considerations for addressing environmental risks and climate change.
- Will not result in any significant environmental impacts that cannot be appropriately mitigated or managed through adherence to the mitigation measures outlined in the supporting technical documentation.

8.0 Conclusion

As set out in this Submissions and Amendment Report, the Applicant has reviewed each of the submissions made by State and local Government agencies. In response to issues raised in these submissions, as well as matters identified by the Department, the Applicant has undertaken further environmental assessment to provide clarifications.

A number of minor changes to the proposed development have been made in the course of responding to matters raised in the submissions, as well as a result of further project design development. This Submissions and Amendment Report has set out these matters as required under section 59(2) and 37(6) of the *Environmental Planning and Assessment Regulation 2021* (EP&A Regulation) and in accordance with the DPHI's *State Significant Development Guidelines*, including *Appendix C – Preparing a Submissions Report* and *Appendix D - Preparing and Amendment Report*.

As discussed in detail in this report, the proposed works will not result in any significant or long-term impact. The potential impacts identified can be reasonably mitigated and where necessary managed through the adoption of suitable site practices and adherence to accepted industry standards.

Therefore, the revised SSD can be justified on the following grounds:

- It is consistent and complies with all relevant legislation, plans and policies
- It provides for the ongoing supply of off-street car parking for the Parramatta South Campus which mitigates traffic and car parking capacity for the Campus community In line with the Proposal
- It will support future development within the Campus, including mitigating any potential traffic generation impacts
- It will support biodiversity and landscape impacts via the Innovative solution to propose turf cell groundcover design which allows for a permeable solution to the car park hardstand area
- The revised proposal is supported from a visual impact assessment perspective and has been assessed against the relevant principles of *Rose Bay Marina Pty Limited v Woollahra Municipal Council and anor [2013] NSWLEC 1046*
- Other supporting technical studies which accompany this Submissions and Amendment Report confirms that the environmental impacts associate with the proposal are minimal and temporary in nature and therefore will not give rise to any adverse long-lasting impacts
- The revised SSD remains to be suitable for the site and is in the public interest.

The Indigenous Centre of Excellence will be an important asset for both Western Sydney University and local community alike, providing a space for the commitment to advancing Indigenous education, leadership, and reconciliation. The Indigenous Centre of Excellence will stand as a symbol of recognition of Indigenous land and the Western Sydney University's relationship with Indigenous communities. The Indigenous Centre of Excellence will represent a celebration of tens of thousands of years of Indigenous knowledges and histories, a legacy that Western Sydney University is honoured to nurture and promote through further education opportunities for students and communities.

The environmental assessment concludes that, subject to the implementation of final mitigation measures outlined in **Attachment B**, the proposed development would not result in any unacceptable impacts and will generate a number of significant social, educational and economic benefits for Western Sydney and NSW. Accordingly, the Department is requested to complete its assessment of the project and recommend the project be approved by the Minister for Planning and Public Spaces.