

**SYDNEY WATER DEVELOPMENT
CIVIC PLACE, PARRAMATTA**

OBJECTIONS

Item No.	Submitted By	Comments	Response
1	Grocon	Whether considered in isolation (as a proposed modern office building) or as one of several buildings that will dominate the landscape in and around Civic Place, the design of the SWC building simply ignores its context. The Development Application overlooks numerous serious urban design considerations concerning the integration of the building with its existing and future environs. It appears to have been conceived in haste and without regard to the long history of strategic and forward planning for central Parramatta (as evidenced by the recent exhibition of the draft LEP and DCP formulated by the Department of Planning for the revitalisation and future development of the second largest CBD within Greater Sydney Metropolitan Area).	The Sydney Water design proposal has been designed within the context of the adopted and gazetted Civic Place Master Plan (CPMP) 2003 and SREP 28. The draft LEP and DCP referred to in the commentary had not been released at the time of concept design and are yet to be adopted. Contrary to the objector's comment, the design has been considered very carefully and both the proponent and tenant have placed considerable importance in a strong design outcome as evidenced by the selection and appointment of Denton Corker Marshall (DCM) for its execution. DCM is a nationally and internationally renowned architectural and urban design practice with considerable experience in complex urban design resolutions. The resolution developed for the Sydney Water proposal exhibits exceptional design merit and provides a contemporary aesthetic outcome with a high level of embedded ESD initiatives. This will provide a strong cornerstone to the rejuvenation of Civic Place and a building appropriate to the status and importance of Sydney Water as a state owned corporate body. We note the proposed Parramatta Council/Grocon Civic Place alternative master plan, received four weeks after the Sydney Water DA submission, makes a number of erroneous assumptions in respect of the Sydney Water site. In particular, we note the

			movement of vehicles down an access ramp in Darcy Street makes no cognisance of site boundaries and would appear to require use of Sydney Water land along Darcy Street frontage in order for the ramp to access to below the proposed retail arcade level. No discussion has taken place to date on this issue with SWC or its selected developer, Multiplex Capital. Similarly, the orientation of the Sydney Water building appears to have been modified in the Parramatta Council/Grocon Civic Place proposal without reference to SWC and the building's context with Smith Street and Civic Place. Concern has been expressed by Sydney Water over the potential for the development of Civic Place to be delayed for a lengthy period of time, subject to the market demand for the proposed mixed development. In terms of responding to the planning controls, the Sydney Water proposal meets the requirements of SREP 28.
2	Grocon	The failure of the Development Application to accommodate the extensive master planning carried out in respect of the Parramatta CBD is most fundamentally demonstrated by the fact that whilst the proposed SWC building relies on access from Darcy Street, Parramatta City Council has as part of its vision for Civic Place, obtained the approval of the Department of Local Government to compulsorily acquire the public road comprised in Darcy Street (the effect of which will be discontinuance of the use of this land as a road). This action on the part of Council (and the approval given by the Department of Local Government) unequivocally recognises the need for Council and associated stakeholders to invest in properly master planned outcomes for central Parramatta CBD and the Civic Place site (and, furthermore, this investment has already been	The Sydney Water design proposal has been designed within the context of the adopted and gazetted Civic Place Master Plan (CPMP) 2003 and SREP 28. The draft LEP and DCP referred to in the commentary had not been released at the time of concept design and are yet to be adopted. The publicly gazetted Civic Place Master Plan (CPMP) 2003 document envisaged vehicular access along Darcy Street, with a turn around, prior to accessing a ramp structure to basement parking under Civic Place. Working within the context of the available and adopted master plan information, the Sydney Water concept design illustrates a significant 'investment' in master planned design outcomes works referred to by the objector without

		started).	compromise to the Civic Place Master Plan (CPMP) 2003 and SREP 28 intent. The objector's comments make no cognisance of the need of Sydney Water to develop its own site to a timeframe that requires considerably greater urgency be applied than that currently exhibited by the Civic Place developer.
3	Grocon	The Development Application significantly fails to accord with the visions statement for Parramatta as documents in the Six Cities Strategy formulated by the NSW State Government. The vision statement seeks to achieve and “<i>exemplary urban environment ... generating a new, vibrant and strong identity, stimulating and facilitating investor confidence. World class architecture will be encouraged ...</i>” It also discusses the Civic Place as a gateway to the city. We do not believe the design for the SWC building responds at all to these objectives and falls short of delivering the NSW State Government's and Parramatta Council's oft stated desire to position itself as the second CBD of Sydney.	Refer to the proponent's response at item 1 above. Furthermore, the relocation of Sydney Water from the Sydney CBD to the Parramatta CBD illustrates a strong commitment on the part of Sydney Water in support of the NSW State Government's and Parramatta Council's stated objectives. It also illustrates confidence in the Council's ability to deliver an exemplary Civic Place urban rejuvenation in support of the Sydney Water cornerstone development.
4	Grocon	So far as the adjoining Civic Place is concerned, if approved in its current form, the SWC building will detract from, rather than enhance, Civic Place and compromise the master-planned outcomes for the Civic Place site. Further the degradation of Civic Place will have reaching implications for the broader redevelopment of Parramatta, given Civic Place is the central focal point from which the growth of the City is to be “leveraged”.	The Sydney Water proposal is consistent with the approved CPMP 2003 and is not detrimental to the proposed amendments to the Civic Place masterplan. The resolution developed for the Sydney Water proposal exhibits exceptional design merit and provides a contemporary aesthetic outcome with a high level of embedded ESD initiatives. This will provide a strong cornerstone to the rejuvenation of Civic Place and a building appropriate to the status and importance of Sydney Water as a state owned corporate body. The key tenancy of Sydney Water will assist in generating a high level of commercial confidence in the Civic Place precinct's future success, as the development of the NSW Police Headquarters, the soon to be completed Parramatta Justice Precinct and retention of

			the ATO (Jessie Street Centre) have for the Parramatta CBD as a whole. The Sydney Water building represents the continuing upwards evolution of both design quality and sustainability outcomes in the delivery of government 'best practice' buildings, drawing from the delivery of the previously mentioned projects by the proponent. Sydney Water is illustrating the highest level of confidence in the future of Civic Place as an appropriate public domain in which its business can be relocated and operate and does not see the design concepts proposed in any way degrading the potential for the future of the precinct of which it will be a key constituent part.
5	Grocon	Whilst the stand alone nature of the Sydney Water building has many adverse consequences, the following are considered critical and long lasting: ▪ Traffic and pedestrian conflicts at Darcy Street ▪ Lack of permeability ▪ Poor urban design ▪ Inferior quality of materials ▪ Loss of public domain ▪ Reduction of sunlight to the recently redeveloped Parramatta bus/rail interchange ▪ Increased risk to public safety ▪ Lack of adequate weather treatment to building to protect the public from wind, rain and sun.	The proponent and Sydney Water as the long term occupant of the building contend that the nature of the proposed development is not detrimental to the future of the Civic Place precinct. Responding specifically:- ▪ Traffic and pedestrian conflicts at Darcy Street The adopted Civic Place Master Plan (CPMP) 2003 clearly envisaged that Darcy Street be retained in part of its length for the purposes of providing vehicular access to basement parking areas. As such this length of retained roadway was envisaged to function as a service access. Therefore, the use of Darcy Street as an access to the basement car parking for the Sydney Water building is consistent with this intent. Furthermore it removes the potential for traffic conflict between vehicular movements from the Civic Place development and Sydney Water on the major roadway of Smith Street. The proposed mid block car park entry illustrated in the Civic Place

			Master Plan (CPMP) 2003 is not available to Sydney Water due to its location on Council land. This is compounded by the uncertainty of the timing of this parcel's future development. Furthermore, due to the nature of its essential service operations (and resultant security profile) Sydney Water has concerns with any reliance upon access through a publicly accessed basement area outside of its control. ▪ Lack of permeability The Sydney Water building allows for visual connection between the occupants' activities and the public domain on the east, north and west faces of the building. The location of its service core to the south provide visual shielding from the service access nature of the Darcy Street activities due to Civic Place access and the adjacent bus layover facility at the Smith/Darcy Street junction. ▪ Poor urban design Refer to the proponent's commentary under items 1, 2 & 3 above. ▪ Inferior Quality of Materials The comments are subjective and appear misinformed. Materials are of the quality commensurate with Sydney Water's corporate image and Council's vision for the city centre. ▪ Loss of Public Domain The ground level footprint of the proposal is smaller than that proposed in the Stage 1 DA providing for greater public open space to the perimeter of the Sydney Water building. ▪ Reduction of Sunlight to Parramatta Rail Interchange The proposed building is sited within the SWC title boundary and is setback from the western end by approximately 6.1 metres. The separation between the SWC proposal and adjoining structures in
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			Civic Place is yet to be determined since no DA submission has been finalised and submitted for these buildings by Parramatta Council/Grocon. Sunlight access to the Transport Interchange will be aided by the reduced overall height of the proposed building that is less than the maximum height permissible under the CPMP 2003. ▪ Increased Risk to Public Safety All sides of the building perimeter will comply with CPTED objectives and afford all publicly accessible areas high levels of surveillance and interaction. ▪ Lack of Adequate Weather Treatment to Building The ground floor is typically located within the tower curtilage which will afford a high degree of weather protection to pedestrians.
6	Grocon	It should be noted that the proposed building is not considered to have met design excellence standards – there has been neither a design competition nor robust peer review process, as would be customary for any project of this kind within the Greater Sydney Metropolitan Area. Further, in keeping with State Government protocol and normal industry practice, it should reasonable be expected that the development will meet (as a minimum) the agreed targets in relation to sustainability including a base building ABGR of 4.5 star and 5 Green Star rating with a minimum credit capacity of 100% for water.	In the final stages of the selection process for the development proponent, three eminent architectural practitioners where engaged by the three contending developers, these being Cox Richardson, Hassell Group and Denton Corker Marshall. These practices are pre-eminent exponents of their professions within the state, nationally and internationally. Furthermore, Sydney Water engaged Bates Smart Architects, an equally eminent national practice to provide a robust and detailed design review of the submitted proposals from the three short-listed development proponents. The comments are correct in that it is a reasonable expectation the development meets agreed sustainability targets. In fact, the Sydney Water proposal is designed to leading sustainability outcomes including a base building ABGR of 5 Star and 5 Green Star rating with a minimum credit capacity of 100% for water. The sustainability initiatives will include rain water harvesting, a blackwater recycling plant and chilled beam HVAC technology. This will represent the continuing upwards evolution of NSW Government

			office facilities and set a high benchmark for the future development of Civic Place,
7	Grocon	Furthermore, the Development Application does not address co-ordination between the SWC and Civic Place sites as required by the adopted Civic Place Master Plan CPMP approval, the result being that a large number of interface issues remain to be resolved.	During the selection process, and specifically when the a shortlist of two proponents was made, Sydney Water called for discussion meetings with Parramatta City Council and its development partner in regard to the coordination of the Sydney Water design proposals with the as yet confidential and unpublished Civic Place proposals. Unfortunately these meetings were not facilitated, nor were the Civic Place concept details, as envisaged, released to the remaining proponents to allow such coordination (limited illustrations of the proposed design were provided to the proponent in late December 2006). The proponent remains willing and available to engage in discussions as necessary to resolve interface issues where such resolution can be achieved without unreasonable compromise to the delivery of a 'best practice' NSW Government office facility for Sydney Water nor the agreed commercial arrangements between the proponent and its tenant.
8	Grocon	So far as the adjoining nature of the Development Application is concerned, it is noted that the omitted information includes the following: ▪ Wind Impact Assessment ▪ Acoustic Assessment ▪ BCA Capability Statement ▪ Occupational Health and Safety Assessment ▪ CPTED Assessment (Crime Prevention) ▪ Disability and Discrimination Access ▪ Adjoining Land Owner's Consent(s) ▪ Minister for Transport and Rail Corporation NSW Approval (as	Pre DA discussions were undertaken with Parramatta City Council to discuss the specialist reports required to accompany the DA where it was identified: ▪ It was confirmed that a wind impact report would be provided at the Construction Certificate (CC) stage in view of the impracticality of obtaining a wind report concurrent with the DA submission given that information regarding the balance of the Civic Place redevelopment was unavailable at this time. ▪ Council officers advised that the CPTED assessment could be prepared by the architect. DCM has provided a CPTED

		required by Covenant AB545843)	overview within the architectural design statement. If required, further input may be provided with the CC. Council officers referred to the Parramatta City Council DA checklist. The following documents are not included in the DA checklist and therefore were not submitted: ▪ An acoustic assessment is not required under the Parramatta Council DA checklist and DCP at DA stage; this can be provided at CC stage if so required by the Principal Certifying Authority (PCA). Comments by Railcorp identify that an acoustic and vibration report is to be prepared at the Construction Certificate stage by way of a condition of consent. Such reports can be undertaken at this later stage so that building construction design will ensure that internal areas, and occupants, will not be adversely affected by rail-related noise and vibration. ▪ A BCA report was not required to be submitted as part of the DA. Council's DA Checklist and the City Centre DCP do not require a BCA report at DA stage; this can be provided at CC stage if so required by the Principal Certifying Authority (PCA). ▪ OH&S Assessment was not required under Council's DA checklist or DCP at DA stage; this can be provided at CC stage if so required by the Principal Certifying Authority (PCA). This document is not a planning consideration. ▪ A Disabled Access report is not included in the DA Checklist at DA stage; this can be provided at CC stage if so required by the Principal Certifying Authority (PCA). Such a report may be submitted at a later stage by way of condition of consent. Adjoining owner's consent and Minister for Transport and Railcorp NSW may be provided at a later stage.
9	Deacons	We have reviewed the documents lodged with the development	Refer to 9 – 12 below

		application and advise that there are a number of matter that create a legal impediment to the approval of the development application in its current form. We list those issues as follows: 1. Council consent as adjoining land owner in relation to the development application. 2. Covenant in favour of Rail Corporation of New South Wales. 3. Council's power to approve the SWC Stage 2 DA.	
10	Deacons	Owners Consent – Council owns the land adjoining the SWC land. The Applicant proposes to place rock anchor and hoardings on Council's land as part of its development. It does not appear from the documents in the development application that Council has consented to the development application. Until such time as that consent is given the application cannot be determined.	There is no requirement for the adjoining owner to consent to the submission of the Development Application. The proponent's construction representatives met with Council and its development partner on 17th January 2007 and an 'in principle' agreement with regard to construction matters, including rock anchors, has been reached with mutual rights being envisaged. The proponent can, if consent on these matters is unreasonably withheld, construct the building using alternative construction methods.
11	Deacons	Covenant – Covenant AB545843 is registered on the title to the SWC land. This covenant provides that SWC must not without the prior written approval of Rail Corporation NSW and the Minister for Transport: ▪ Permit, allow or cause any water to be discharged from SWC land onto, in, under or through any land owned by Rail Corporation New South Wales; ▪ Erect or allow any drainage works to be erected on SWC land unless they are also approved by PCC as consent authority; and ▪ Erect, construct or place upon the SWC land or allow to be erected, constructed or placed on it any building, fence or other structure.	There is no requirement for the RailCorp to consent to the submission of the Development Application. Discussions have commenced with RailCorp to ensure satisfactory resolution and adherence to its requirements. Such adherence can be made a condition precedent to the issue of a Certificate of Compliance for the Sydney Water development.

		There is no evidence in the application that either SWC or the Applicant has obtained the consent of Rail Corporation of NSW or the Minister as required under this covenant.	
12	Deacons	Council's Power – The SWC Stage 2 DA has been lodged as a “Stage 2” development application. It appears from the development application documents that the Applicant accepts the concept plan approval as establishing the floor plate, height, bulk and scale and orientation of the building and now only seeks to provide the additional detail not considered in the Stage 1 DA. As well, the application seeks to incorporate some “minor” modifications. However, the application also states it is a “fresh DA” (see page 3 of SEE). In our view, it is not open to Council to approve the Stage 2 DA for the following reasons: 1. Modification of Stage 1 concept plan The EP&A Act does not permit any subsequent application of a staged development to depart from the original concept plan. That is, if SWC wishes to: a) relocate its entrance to Darcy Street; and b) add additional floor space to the building, as set out in the SWC Stage 2 DA, then it will need to with modify the concept plan or lodge a new development application that properly addresses all the planning issues that	This DA is submitted as a “fresh” new application, despite there being a DA approval for the building envelope on the site. Therefore there is no proposal to modify the “Stage 1 DA” by way of Section 96. A “fresh” DA has been lodged for the site incorporating the revised floor space and building envelope. In this regard, the relationship of whether the new scheme is consistent with the approved scheme is irrelevant. The proponent confirms that the submission made is a fresh DA in recognition of some departure from the Stage 1 Master Plan DA. Sydney Water holds correspondence from Parramatta City Council accepting that the submission of such an application would be made without compromise to the outcomes established in the secured Stage 1 DA (FSR, height, use etc.) The proponent's DA submission adequately addresses the elements of change from the Stage 1 Masterplan DA and provides for a design exhibiting strong urban design resolution, within the context of the Civic Place Master Plan (CPMP) 2003 and SREP28, and significant design merit.

		arise. 2. Conditions of the Stage 1 DA The Applicant has not demonstrated compliance with the condition of the Stage 1 DA which is necessary to enable Council to move on to deal with the Stage 2 DA. If it is assumed that the Stage 2 DA is a new development application for the site and not merely a Stage 2 development application following from the Stage 1 concept plan then the Applicant must properly deal with the matters which lead to the imposition of conditions set out in the Stage 1 development consent. The Applicant does not do this. 3. SEPP 11 Whether or not the application is fresh DA or a staged application, the Applicant has not dealt with the requirements of SEPP 11. The changed access regime must be properly scrutinised. It is not appropriate for the applicant to rely on a proposed future road pattern which has not been authorised by the relevant agencies or approved by the State government as a basis for not complying with SEPP 11. Indeed the proposal to use Darcy Street as the access for the SWC building could result in Darcy Street not being closed at all as contemplated. Therefore the applicant, if it chooses to use this access should provide appropriate traffic studies and Council should consult with the RTA.	The conditions of the “Stage 1 DA” have no relevance in the assessment of the subject proposed building as it is a “fresh” new application and therefore is no requirement to address the conditions of the consent of the “Stage 1 DA” SEPP 11 requires the consent authority to refer development listed under SEPP 11 to the RTA for comment. The SEE noted the applicability of SEPP 11 and therefore the issue relating to the applicant's non-compliance with SEPP 11 is not warranted. The adopted Civic Place Master Plan (CPMP) 2003 clearly envisaged that Darcy Street be retained in part of its length for the purposes of providing vehicular access to basement parking areas. As such this length of retained roadway was envisaged to function as a service access and access to below ground parking. Therefore the use of Darcy Street as an access to the basement car parking for the Sydney Water building is consistent with this intent.
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			Furthermore it removes the potential for traffic conflict between vehicular movements from the Civic Place development and Sydney Water on the major roadway of Smith Street. The proponent has engaged an experienced traffic consultant who has provided advice in clear support of the design submitted and it being appropriate to the use of the Sydney Water site and adjacent uses.
13	JBA	It is noted that this DA is a fresh application and that the applicant has chosen not to follow and comply with the approved Stage 1 DA for the site. Accordingly, this application is for an entirely new building and building envelope.	The proposed scheme is different to the approved scheme in terms of floor space and building envelope and therefore warranted a new DA for the site, separate from the approval granted. In this regard, the relationship of whether the new scheme is consistent with the approved scheme is limited.
14	JBA	Building Envelope & Massing – SREP 28 Clause 25(d) of SREP 28 states that the buildings are to have regard to adjoining buildings in relation to height transition, massing and scale. At this stage the specific design of neighbouring buildings is not yet determined. Notwithstanding this, the proposed development is significantly lower than that envisaged for this site in SREP 28. This reduced the likelihood of the building providing a suitable transition to future development on the southern side of Civic Place.	SREP 28 identifies a maximum height provision of 126m. The proposed height of 64m is in compliance with the SREP. The SREP does not dictate minimum heights sought for the City Centre. The proposed height will assist in providing a transition of heights from Civic Place to the lower rise heritage buildings to the east. The nett impacts of overshadowing in mid-winter upon the railway station are insignificant relative to the previously approved scheme on the Sydney Water site. No material increase in sunlight loss over the railway station occurs as a result of reduced separation distances between buildings. Similarly, the height controls for the site under the SREP will allow for a building that will overshadow the railway station in view of the railway station's immediate proximity to the site.

			Submitted shadow diagrams illustrate the shadow impacts of the previously approved scheme on the site; buildings in Civic Place at heights and siting as per the Civic Place Master Plan June 2003. In summary, the shadow diagrams illustrate: - At 9am there is an insignificant increase in overshadowing to the east of the railway station relative to the original approved scheme. - At 12pm and 3pm the shadow line is shifted to the west over the railway station to a minor degree, relative to the original approved scheme. Potential north-south links from the railway station are maintained by the proposed siting of the building. Item noted, as has been stated above the concept design for the Sydney Water building has been developed within the context of both SREP 28 and the Civic Place Master Plan (CPMP) 2003 in the absence of other gazetted statutory planning instruments at the time on its inception. Neither instrument defines the height envelope provisions as being mandatory minimum levels. FSR controls also apply to the development, the use of the available FSA if combined with a maximised envelope height would result in extremely ineffective and inefficient floor plate sizes for the tenant which will fail to meet Sydney Water's stated objectives for a 'best practice' government office facility. Given the status of the Parramatta City Council/Grocon proposals both at the time of the proponent's selection to deliver the Sydney Water project and the formulation of the DA submission the proponent has been unable to facilitate a design 'dialogue' with the future neighbouring works. Given the likely market driven nature of the future, adjacent, development there is a degree of uncertainty as to the eventual outcomes within the Civic Place precinct in terms of
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		CPMP Section 6.3 of the CPMP requires that gaps must be provided between towers in the southern portion of the site to allow sunlight access to the railway station. From the information provided (with the DA) the exact setback on the western boundary of 1 Smith Street is unclear. However it is clear that this setback has been reduced from the previous Stage 1 DA approved on the site. A reduced setback has implications for pedestrian access and solar penetration to Parramatta Station. The lack of separation is contrary to the Master Plan as it reduces both solar access to the Railway Station and north-south links and connectivity.	the physical forms etc. to which the Sydney Water building could respond. The Sydney Water building has been developed within the context of both SREP 28 and the Civic Place Master Plan (CPMP) 2003 and follows the intent of the building massing illustrated within these instruments. The setbacks on the ground plane of the Sydney Water building to the western boundary is 7.0m. This, in the proponent's opinion, provides for significant public accessibility, both physical and visual, between the Parramatta Interchange and Civic Place public domain areas. The proponent contends that the solar access to this thoroughfare is not compromised by the design proposal. The proponent understands that the Parramatta City Council/Grocon proposals envisages that the adjacent building (to the west) will exceed the height limits within SREP28 and wishes to register its concern with regard to the increased detrimental impact upon solar access and environmental wind outcomes.
15	JBA	Building Setbacks – SREP 28 Clause 25(c) of SREP 28 states that buildings should be predominately built to the street alignment and side boundaries. While frontages generally align with both Smith Street and Darcy Street, they are well set back from the street at ground level and footpaths appear rather wide.	The setbacks on the ground plane of the Sydney Water building to the southern boundary vary from 1.9 to 6.9 metres and eastern boundary is approximately 3.7 metres. These provide for significant public accessibility, both physical and visual, and are appropriate in the architectural form of the proposal. The ground floor level is setback from Smith Street by approximately 4m to allow a sheltered colonnade zone as part of one of the main access points into the building. The colonnade is

			proposed to the Smith Street frontage which provides for a built form alignment to Smith Street. A setback from the Darcy Street alignment is proposed due to the “skewed” alignment of the Darcy Street property boundary. The proposed ground floor edge will present as a predominantly consistent street edge by the lift core and stair well elements. By following the “skewed” alignment of the Darcy Street boundary, an irregular shaped footprint to the south will result.
16	JBA	Character of Civic Place – SREP 28 Clause 28(2)(i) of SREP requires that the proposal must be consistent with the desired future character of Civic Place and, amongst other requirements: ▪ Create of a safe pedestrian square. ▪ Create east-west, north-south site links and access to the Railway Station. ▪ Provide adequate separation between the towers at the south-east to ensure building mass is broken up. ▪ Complement the function of the railway station and transport interchange. The proposal is inconsistent with Clause 28(2) of SREP 28 in that: ▪ In the longer term, the proposal will provide a safe northern square, however the treatment of Darcy Street (with no active street frontage) is potentially unsafe. ▪ North-south links and access to the Railway Station are poor. ▪ Separation from a new building in the south-east corner is unspecified and will require the new (Grocon) building to be set	The concept design for the Sydney Water building has been developed within the context of both SREP 28 and the Civic Place Master Plan (CPMP) 2003 in the absence of other gazetted statutory planning instruments at the time on its inception. The Parramatta City Council/Grocon proposals were not available to the proponent at both at the time of the proponents selection to deliver the Sydney Water project and the formulation of the DA submission the proponent has been unable to facilitate a design ‘dialogue’ with the future neighbouring works. The proponent contends that the Sydney Water proposal is consistent with respect to the intent of the statutory instruments in the creation of:- ▪ A safe pedestrian square to the northern edge of the Sydney water site; ▪ East-west, north-south site links and access to the Railway Station;

		back further to provide adequate, well-lit and safe north-south link to the Station. ▪ The treatment of Darcy Street in relation to pedestrian amenity, the car park entrance, and building separation and do not meet the intent of clause 28(2)(i)(xiv). In addition, Clause 28(2)(i)(xiv) requires a wind analysis to ensure the design minimises wind tunnel effects. No wind assessment was provided on the grounds of there being no information on adjacent buildings. This is not considered an adequate reason for non-compliance as Darcy and Smith Streets	▪ Adequate separation between towers at the south-east to ensure appropriate building mass; and ▪ Complementary functions to the Rail and Transport Interchange activities; ▪ Passive surveillance over Darcy Street will occur as Darcy Street will be an active zone: - The north-south link from the railway station is designated to extend immediately from Darcy Street and extend adjacent to the Sydney Water Building and will accommodate one of the main access points into the building, therefore providing pedestrian activity. - Vehicular access to the Sydney Water Building is proposed from Darcy Street. - Vehicular access to the car park for the Civic Place development, proposed by Parramatta City Council/Grocon is from Darcy Street. - Darcy Street will also function as a drop off and pick up point. The adopted Civic Place Master Plan (CPMP) 2003 clearly envisaged that Darcy Street be retained in part of its length for the purposes of providing vehicular access to basement parking areas. As such this length of retained roadway was envisaged to function as a service access. Furthermore the Civic Place Master Plan (CPMP) 2003 envisages that the primary pedestrian access route is from the Rail Interchange to the Civic Place directly northwards. The Sydney Water proposal is consistent with this intent. As discussed with Council during a pre DA meeting, a wind impact assessment was not submitted with the DA as the built form details of the proposed Grocon Civic Place Master Plan scheme was not available at the time. Such an assessment was agreed to be provided at a later stage.
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		could be modelled based on existing structure such as the Station, the Transport Interchange and other surrounding buildings, the CPMP and building heights specified in SREP 28.	The proponent has sought advice as to the potential impacts of the proposal due to wind effects and with specific regard to the Wind Tunnel Study appended to the CPMP 2003. This advice suggests that the implications for impact are minimal specifically in the context of the ability for the site to be developed to a significantly greater height. If required the proponent will undertake an environmental wind study as a condition precedent to the commencement of construction. The proponent understands that the Parramatta City Council/Grocon proposals envisages that the adjacent building (to the west) will exceed the height limits within SREP28 and wishes to register its concern with regard to the increased detrimental impact on environmental wind outcomes.
17	JBA	Solar Access – SREP 28 Clause 26(3) – New buildings must comply with the sun access plane provisions. It is unclear from the information provide whether the proposal complies with this clause in its entirety in relation to Lancer Barracks. In particular, the applicant has not addressed clause 26(3)(ii)(D) in relation to the impact of overshadowing on the heritage significance of Lancer Barracks, not cogently demonstrated in relation to the variation to the sun access plant that it fully complies with clause 28(2)(i) as required by clause 26(3)(ii)(B).	Shadow diagrams are provided within the submitted DA Statement of Environmental Effects (SEE) illustrating the impact upon the Lancer Barracks. These impacts are considered acceptable in the opinion of the specialist heritage consultant engaged by the proponent (Graham Brookes and Associates). Shadow diagrams as submitted, illustrate that the proposal will have limited overshadowing to Lancer Barracks at 2pm. The shadow will be limited to a portion within the western street boundary and is acceptable and will not adversely impact upon the heritage significance of the site because: - The nett additional shadow represents a marginal increase to the extent of shadow cast by the approved Stage 1 DA. - The shadow will not impact upon the parade grounds of

			Lancer Barracks during this period or the most significant buildings. - The shadow will be cast over the roofs of the Officer's mess; a portion of the Drill Hall / Officer's Club and a corner of the Lecture Room. Furthermore the impact potential is significantly reduced in comparison to that envisaged by the 126m height envelope in SREP28 and the Civic Place Master Plan (CPMP) 2003.
18	JBA	Active Street Frontages – SREP 28 Clause 17(c) of SREP 28 states that active street frontages are to be provided to encourage and protect accessible city blocks. Neither Smith Street nor Darcy Street is activated. The proposed building ignored these street frontages with the wide car park access on Darcy Street further militating against activation. This has the potential to sterilise this corner area so reducing safety and security in the locality.	The proponent's design proposal provides for active frontages on east, west and north with a high level of physical and visual connectivity between the buildings users and the public domain beyond. Smith Street is the address point for the building with an entry point into the building's reception and public interface area to this side of the building. The glazed façade along the extent of Smith Street and colonnade zone provides for an active street frontage. The Darcy Street frontage has been designed to accommodate the service functions of the building. The adopted Civic Place Master Plan (CPMP) 2003 clearly envisaged that Darcy Street be retained in part of its length for the purposes of providing vehicular access to basement parking areas. As such this length of retained roadway was envisaged to function as a service access, vehicular access point for below ground parking; and drop off / pick up point. Service elements in the Darcy Street façade have been designed to feature and integrate as architectural elements. The provision of a main access point into the building via Darcy Street to the "railway walk" contributes to activating the Darcy Street zone.

			The concept proposals released by Parramatta City Council/Grocon continue to adopt the intent of the gazetted statutory instruments that the partially retained Darcy Street acts as a service corridor for basement access and drop-off purposes.
19	JBA	Colonnades – CPMP Section 6.7 of the CPMP required that to give an appropriate civic character to Civic Place, double height colonnades are to define the public spaces, and must have a minimum width of 4.5m between columns at ground level. The CPMP clearly illustrates a colonnade of 7.2 metres. It is noted that the width between proposed colonnades complies with the Master Plan. However, the proposed height of the colonnades is well in excess of the required height by 3 storeys with colonnades terminating at Level 5 rather than Level 2 as stipulated in the Master Plan. The cohesive future character of Civic Place achieved through uniform colonnades is significantly compromised.	The proponent's design proposal provides for a colonnade with column spacing of 8.1m and contends that the height of the colonnade is an appropriate element in the overall architectural composition of the building in response to the Architectural Character objectives of the CPMP 2003. The proponent understands that the concept proposed by Parramatta Council/Grocon involves a significant evolution of the colonnade concept envisaged within the CPMP 2003 as evidenced by released computer generated illustrations.
20	JBA	Pedestrian Access – SREP 28 & City Centre DCP Clause 25(f) of the SREP states that space allocated to vehicle entrances is to be minimised, with entrances from the lanes or centre blocks while Section 9.2 of the DCP has a preferred driveway width of 6 metres with 6 metres the maximum. The proposed 10 metre wide vehicle entrance off Darcy Street is considered excessive and does not comply with the requirements of the SREP or DCP. This vehicle opening has the potential to impact	The adopted Civic Place Master Plan (CPMP) 2003 clearly envisaged that Darcy Street be retained in part of its length for the purposes of providing vehicular access to basement parking areas. As such this length of retained roadway was envisaged to function as a service access, access to parking and as a drop off/ pick up point as illustrated in Figure 7.10 of CPMP 2003. The combined entry/exit vehicular point proposed to Darcy Street is

		on pedestrian safety on the Darcy Street frontage, obstructs pedestrian flows and further sterilised the use of Darcy Street. Clause 25(j) of SREP 28 states that a proposal must retain existing laneways and public access ways. North-south access to and from the Station – a major pedestrian desire line – is potentially compromised. CPMP Section 6.4 of CPMP requires that the eastern most axis of the site is to enhance pedestrian movement to and from the Railway Station and the Transport Interchange. The design does not address this axis, or indeed pedestrian access to the Railway Station or transport interchange overall.	located east of the north-south link such that there is no conflict between pedestrians and traffic. The width of the entry is required to accommodate all vehicles, including delivery vehicles, the required turning circles for entering and exiting has determined the overall width. This will enable all vehicular activity to be confined to within the site. Vehicular entry off Smith Street is impractical due to the design constraints to the Smith Street façade and the traffic flows along Smith Street. The north-south link from the railway station is designated to extend immediately from Darcy Street and run adjacent to the Sydney Water Building, which will accommodate for one of the main access points into the building, therefore providing pedestrian activity. Formal landscaping and retail space will provide amenity to this space. The concept proposals released by Parramatta City Council/Grocon continue to adopt the intent of the gazetted statutory instruments that the partially retained Darcy Street acts as a service corridor for basement access and drop-off purposes. The pedestrian traffic flow envisaged from the Rail Interchange to the main public spaces with Civic Place is north/south between the Sydney Water site and that adjacent (to the west). The desire line envisaged is not compromised by the Sydney Water design proposal. The pedestrian circulation patterns illustrated in Figure 7.2 of CPMP 2003 are retained, uncompromised, within the proponent's design proposal for Sydney Water.
21	JBA	Vehicle Access –	

		CPMP Section 6.13 of CPMP states that vehicle access is to be via Macquarie Street or Smith Street and that Darcy Street is to be closed to through traffic and function as a drop off/pick up area in the future. The proposed development does not comply with this requirement in that the only vehicular access is provided off Darcy Street via a very wide driveway. As has been identified above, this non-compliance has the potential to impact on the activation of the Darcy Street frontage and the safety and security of pedestrians in the area. Access for vehicles, including trucks and delivery vans off Darcy Street conflicts with this planned street closure and the ability of Darcy Street to function as a safe drop off/pick up point.	The adopted Civic Place Master Plan (CPMP) 2003 clearly envisaged that Darcy Street be retained in part of its length for the purposes of providing vehicular access to basement parking areas. As such this length of retained roadway was envisaged to function as a service access and drop-off as illustrated in Figure 7.10 of CPMP 2003. The concept proposals released by Parramatta City Council/Grocon continue to adopt the intent of the gazetted statutory instruments that the partially retained Darcy Street acts as a service corridor for basement access and drop-off purposes.
22	JBA	Noise & Vibration – SREP 28 Clause 75 requires that development is not to be adversely affected by rail-related noise or vibration unless development incorporated assessment and mitigation measures consistent with current EPA (now Department of Environment and Conservation (DEC)) noise policies, including <i>Industrial Noise Policy</i> and <i>Environmental Criteria for Road Traffic Noise</i>. The proposal has not addressed this clause. No acoustic assessment was submitted with the application and the DA does not supply any hard evidence that assessment has occurred and mitigation measures incorporated to attenuate rail noise and meet DEC noise criteria.	Discussions have commenced with RailCorp to ensure satisfactory resolution and adherence to its specific requirements. Such adherence can be made a condition precedent to the issue of a certificate of compliance for the Sydney Water development. Advice from the proponent's specialist consultant (Acoustic Logic) confirms that these matters can be readily addressed to the satisfaction of RailCorp.
23	JBA	Inadequate Supporting Information –	

		It is noted that that several specialists reports were not provided with the DA in accordance with the relevant planning instruments and Council's DA Checklist. Council's assessment of the proposal would be incomplete in the absence of the following documents; ▪ Wind Impact Assessment; ▪ Acoustic Assessment; and ▪ BCA Capability Statement.	Pre DA discussions were undertaken with Parramatta City Council to discuss the specialist reports required to accompany the DA where it was identified: ▪ It was confirmed by Council that a wind impact report would be provided at a later stage in view of the impracticality of obtaining a wind report given that the balance of the Civic Place redevelopment was not confirmed at the time. Council officers referred to the Parramatta City Council DA checklist. The following documents are not included in the DA checklist and therefore were not submitted: ▪ An acoustic assessment is not required under the Parramatta Council DA checklist and DCP. Comments by Railcorp identify that an acoustic and vibration report is to be prepared at the construction certificate stage by way of a condition of consent. Such reports can be undertaken at a later stage to ensure that building construction design will ensure that internal areas will not be adversely affected by rail-related noise and vibration. ▪ A BCA report was not required to be submitted as part of the DA. Council's DA Checklist and the City Centre DCP do not require a BCA report at DA stage. See appended reports advising that the proposed development is compliant.
24	ARUP	The Civic Place development will provide up to 2,500 car parking spaces associated with the retail, commercial and residential components of the development. The busiest peak period will occur in the afternoon when some 1,500 to 2,000 vehicle movements into and out could be expected. The proposed Sydney Water development will provide 254 car parking spaces and is expected to generate up to some 150 to 200 vehicles per hour two-way during	We agree that access arrangements for the Sydney Water and Civic Place developments are critical in providing convenient and appropriate access to all relevant sites. With limited site frontage for the Sydney Water site, there is significant merit in giving consideration to providing a combined access for these developments. The traffic analysis undertaken has found that a separate access to the Sydney Water site would work satisfactorily.

		the morning and afternoon peak house periods. It is therefore crucial that access arrangements for these two developments be considered together given the limited site frontage for vehicle access locations. In addition, the Civic Place development will generate 10 times the vehicle movement compared to Sydney Water during the peak afternoon period.	
25	ARUP	The Stage 2 DA access arrangements for the proposed Sydney Water development are proposed to be provided via a combined entry/exit driveway onto Darcy Street. The driveway is to be located at the south-western corner of the site, some 50 metres west of the signalised intersection of Smith Street/Station Street/ Darcy Street. A truck dock able to accommodate large rigid trucks would also be accessed from this driveway to Darcy Street. The Sydney Water proposal does not therefore meet the objectives of the adopted Master Plan i.e. that Smith Street be the primary point of access for the Sydney Water building and Darcy Street provide the primary point of access to Civic Place. By proposing this arrangement, the design does not consider the overall future master plan for the Civic Place precinct.	Access for the Sydney Water development has been located off Darcy Street as it provides the most convenient access for the site and is supported by RTA and the Regional Traffic Committee. Access from Darcy Street is based on sound transport planning principles in order to provide the least impact on main road traffic and public transport bus services in Smith Street. Access to and from Darcy Street will be controlled by traffic signals at the intersection of Smith Street/Darcy Street and will provide the greatest distribution of traffic to the surrounding road network. Access to and from Smith Street would be restricted to left in/left out, would require vehicles to cross the northbound bus lane in Smith Street, and would distribute a greater proportion of traffic through the Parramatta CBD, potentially affecting the operation of CBD intersections.
26	ARUP	Located immediately to the north of Parramatta Station and adjacent to Church Street Mall, Civic Place will interface with Macquarie Street and Smith Street on its northern and eastern sides to provide for vehicle access to the basement car parks and surface level internal street system. Both of these street frontages will be treated as important urban spaces providing addresses to a range of retail, community, Council, residential and commercial uses. Vehicle access points on these frontages will need to be designed sympathetically. It is therefore fundamental that the proposed Darcy	Plans of the Civic Place development indicate a two-way access ramp in Darcy Street providing access to car parking and service docks beneath Civic Place. These ramps for cars (entry and exit) and service vehicle (entry only) would require to link between Darcy Street (RL14.5) and proposed parking and service level (RL4.5). The ramp would need to clear the concourse level (RL10.5) and provide appropriate clearances for large service vehicles of 4.5 metres and is not workable in its current configuration.

		Street access portal operates as a primary point of access feeding traffic via Smith Street. This access is supported by the proposed portal within Smith Street facing north.	The location of the proposed ramps as shown on plans prepared by Hassell Architects do not take into consideration these dimensions and the requirements of the Australian Standards (AS2890.1-2004 and AS2890.2-2002). Therefore the proponent believes that the current design for the Darcy Street ramps for the Civic Place development is unworkable.
27	ARUP	The design of the access portal for Darcy Street requires at least one entry and one exit lane to the portal with an additional entry and exit lane to provide for drop-off and pick-up activity at Darcy Street level. Darcy Street will be closed to traffic to the west of the Sydney Water site and hence all surface level drop-off and pick-up traffic will loop around to enter and exit via the Smith Street traffic signals. The location of the proposed tunnel portal in Darcy Street does not allow for the entry and exit driveway to function as proposed by the Sydney Water development. The master plan envisaged the Sydney Water access driveway to be located directly onto Smith Street just to the north of the Darcy Street intersection, and this would allow for the proper traffic access function of both sites. As previously mentioned, Civic Place will be relying heavily on the Darcy Street Access portal and with only a tenth of the traffic generation, the Sydney Water site would be best served by direct access to Smith Street.	Access to the Sydney Water site to/from Smith Street was investigated but was not favoured due to site constraints nor supported by the RTA. As previously noted, the preferred access to/from the site, supported by the RTA, is to/from Darcy Street via the signalised intersection with Smith Street and Darcy Street. Access to and from Smith Street would restrict access to left in/left out, would require vehicles to access the site via the northbound bus lane in Smith Street and would distribute a greater proportion of traffic through the Parramatta CBD.
28	ARUP	Should the Civic Place entry portal need to be moved further west to provide clear access into the Sydney Water site in Darcy Street, then the Station Square plaza level at RL14.5m would be impacted upon to the point where a direct pedestrian connection would not be possible to the rail concourse. Pedestrian and vehicular conflicts at RL14.5 would occur with an adverse 'knock on' effect comprising other building forms as contemplated under the adopted Government Architect' Master Plan.	As previously noted, the location of the Darcy Street portal as shown on the Civic Plaza Masterplan is fundamentally flawed as it does not take into consideration height clearances and the impact of the lower concourse and car parking levels. The proposed plans appear to be not in accordance with the Australian Standards and therefore detailed plans of the proposed ramps are required in order to take into consideration the requirements of the Civic Place development.

			It is considered that once this information is provided, a combined solution for access to/from the Sydney Water and Civic Place developments may be further investigated.
29	ARUP	For Civic Place there will be sharing of traffic movements across the different access points along Macquarie Street, however, given the conflicting urban design requirements for this frontage, the Darcy Street portal will be the focus of the majority of vehicle access. This also has the advantage of feeding directly into Smith Street at traffic signals allowing for movements to the north and south. This is needed to spread some of the traffic load away from Macquarie Street which alone cannot handle the total traffic access requirements.	For a similar reason access to/from the Sydney Water site has been provided onto Darcy Street. Access from Darcy Street allows for a greater distribution of traffic movement onto the surrounding road network and minimises additional traffic through the Parramatta CBD.
30	ARUP	On the basis of this traffic assessment, the only access option that achieved an acceptable level of service at the Macquarie Street/Smith Street intersection included a major portal entry into the Civic Place development in Darcy Street. The Sydney Water site therefore needs to respond to this requirement by either integrating access with the Darcy Street portal (possibly at a later stage) or by providing access directly to Smith Street. No analysis was undertaken for the critical Macquarie Street/ Smith Street intersection and this should be provided.	The Sydney Water site has frontage to both Smith Street and Darcy Street. Access arrangements were investigated along both of these frontages and the preferred access location supported by the RTA, was developed into Darcy Street. The proposed Civic Place development has not respected the boundary of the Sydney Water site and has simply incorporated the Civic Place development requirements across the entire site. It is considered that a shared access arrangement to both developments could be considered in Darcy Street providing access to these developments. The timing of the proposed development of Civic Place would then need to be considered to enable short and long term needs to be responded to for Sydney Water as well as the Civic Place development. With respect to the intersection of Macquarie Street/Smith Street and the effects of the additional traffic in the operation of this intersection, it should be noted that the regional implications of future development growth in Parramatta (incorporating the Sydney

			Water and the Civic Place developments) have previously been assessed in the overall transport management and accessibility plan prepared for the City Centre.
31	Tzannes Associates	Design Statement – The tower does not integrate into the Civic Place precinct for the following reasons: ▪ the buildings orientation aligns with Smith Street rather than Civic Place ▪ the buildings materials are of a lower standard than those anticipated for Civic Place ▪ the proposed finished levels at the edge of the site do not accord with the proposed finish levels of Civic Place.	The proponent's design proposal is consistent in its orientation to both CPMP 2003 and SREP28 statutory instruments refer to Figure 7.4 of CPMP 2003, Urban Structure Plan. This clearly shows alignment of the Sydney Water building to Smith and Darcy Streets, not Civic Place. Further, the Civic Place Master Plan as proposed by Parramatta City Council/Grocon was not available for consideration during the design process towards the proponent's DA submission (being received some 4 weeks after DA submission despite requests for access to this information) and has not been released in full as has been requested. The proponent contends that the materials selected are consistent in quality terms with the intent of CPMP 2003 and in keeping with the significance of Sydney Water as a state owned corporate entity. The proponent is willing to work with the Civic Place developers to achieve integrated design solutions for proposed finishes and levels.
32	Tzannes Associates	Site Analysis – St Johns Church, Lancer Barracks and Civic Place share a common orientation, the proposal is set at a different orientation that disturbs 'the historic axis' (sic) between St John's Church and Lancer Barracks. The north east corner of the proposal prevents a direct line of sight between St John's Church and Lancer Barracks, reorientation and reconfiguration would allow a direct line of sight. Therefore the proposal does not preserve the historic axis between St John's Church and Lancer Barracks.	The proponent's design proposal is consistent in its orientation to both CPMP 2003 and SREP28 statutory instruments (refer to Figure 7.4 of CPMP 2003, Urban Structure Plan). The suggested re-orientation of the Sydney Water will not provide a direct line of site between St John's Church and Lancer Barracks.

33	Tzannes Associates	Site Analysis – The proposal is well below the height limit for the site. A taller thinner building would increase the open space to the north and allow the fulfilment of Item (23) above. Therefore the proposal does not maximise open space to the north.	The proponent's design proposal for the Sydney Water building has been developed within the context of both SREP 28 and the Civic Place Master Plan (CPMP) 2003 in the absence of other gazetted statutory planning instruments at the time on its inception. Neither instrument defines the height envelope provisions as being mandatory minimum levels. FSR controls also apply to the development, the use of the available FSA if combined with a maximised envelope height would result in extremely ineffective and inefficient floor plate sizes for the tenant which will fail to meet Sydney Water's stated objectives for a 'best practice' government office facility. The proponent contends that the design proposal provides for adequate open space within the context of the CPMP 2003.
34	Tzannes Associates	Site Analysis – As outlined in Item (24) above the proposal could have been further setback along the southern boundary of Civic Place. Therefore the proposal does not set back building along the southern boundary to maximise Civic Place.	The proponent contends that the design proposal provides for adequate open space within the context of the CPMP 2003.
35	Tzannes Associates	Site Analysis – On the ground level to the north onto Civic Place the proposal presents a glass wall with no opening; to the south there is a solid opaque wall with the only openings being fire escapes and the car entry; and, to both the west and east there is a single rotating door. No active uses interfaces with exterior, inside the foyer away from the façade and with no separate access to the exterior is a single retail space, this does not activate the edge of the building. Therefore the proposal does not Activate edges at lower levels.	The proponent's design proposal provides for active frontages on east, west and north with a high level of physical and visual connectivity between the buildings users and the public domain beyond. Smith Street is the address point for the building with an entry point into the building's reception and public interface area to this side of the building. The foyer café is provided with several door openings providing access to an external seating terrace. The Smith Street glazed foyer extends around the corner into Darcy

			Street creating an active edge to the intersection. Large windows within the service core provide a visual connection between the main lift lobby and Darcy Street. The colonnade and associated terrace will provide an area for al fresco dining and seating overlooking Civic Place.
36	Tzannes Associates	Site Analysis – The colonnades are excessively tall and this prevents them providing shelter from wind blown rain or the sun. No other amenity is provided by the colonnades and no other devices to provide shelter are evident. Therefore the proposal does not utilise colonnades and other devices to provide shelter and amenity.	The colonnades are located within the tower curtilage and will provide protection subject to wind direction, and sun shading at certain times throughout the day. The colonnade fronting Civic Place creates a series of alcoves for tables, chairs, umbrellas and the like.
37	Tzannes Associates	Site Analysis – The proposal has a relatively low level of articulation.	The tower form is articulated in two tall elegant glass forms with a recessed interlayer between the two volumes. The volumes differ in height, stepping down towards Civic Place. The glazed facade is expressed into two storey high modules by a grid of small re-entrants, each module is articulated with horizontal passive solar control louvres. Within the curtilage of the piloti the foyer, the blue box and the deeply recessed level four create a highly articulated built form massing. The service core is articulated as nine individual shafts that break free at the top of the building to create a powerful signature on the Parramatta skyline.
38	Tzannes Associates	Site Analysis – The continuous glass wall prevents any physical permeability into Civic Place.	The proponent's design proposal provides points of access on each of the east, west and north frontages with a high level of physical

			and visual connectivity between the building's users and the public domain beyond
39	Tzannes Associates	Design Response – As outlined in 5 (24) and 6 (25) above a taller thinner building would preserve the view corridor; the proposal does not do this.	The proponent's design proposal for the Sydney Water building has been developed within the context of both SREP 28 and the Civic Place Master Plan (CPMP) 2003 in the absence of other gazetted statutory planning instruments at the time on its inception. Neither instrument defines the height envelope provisions as being mandatory minimum levels. FSR controls also apply to the development, the use of the available FSA if combined with a maximised envelope height would result in extremely ineffective and inefficient floor plate sizes for the tenant which will fail to meet Sydney Water's stated objectives for a 'best practice' government office facility.
40	Tzannes Associates	Design Response – As discussed the footprint is not minimised and active edges are not provided.	See 39 above
41	Tzannes Associates	Design Response – As discussed above the proposal does not orientate to Civic Place.	The proponent's design proposal is consistent in its orientation to both CPMP 2003 and SREP28 statutory instruments (refer to Figure 7.4 of CPMP 2003, Urban Structure Plan).
42	Tzannes Associates	Design Response – The facades are generally flat and are relatively unarticulated. There is visual transparency only to Civic Place and no transparency to Darcy Street. Therefore on balance this response is not fulfilled.	The tower form is articulated in two tall elegant glass forms with a recessed interlayer between the two volumes. The volumes differ in height, stepping down towards Civic Place. The glazed facade is expressed into two storey high modules by a grid of small re-entrants, each module is articulated with horizontal passive solar

			control louvres and recessed feature channels to the curtain wall.
43	Tzannes Associates	Design Response – The overall built form does not fit within the Civic Place Masterplan; it has conflicting orientation, it is not tall enough, the colonnade is too tall and it could be further set back from the north.	The proponent's design proposal for the Sydney Water building has been developed within the context of both SREP 28 and the Civic Place Master Plan (CPMP) 2003 in the absence of other gazetted statutory planning instruments at the time on its inception. Neither instrument defines the height envelope provisions as being mandatory minimum levels. FSR controls also apply to the development, the use of the available FSA if combined with a maximised envelope height would result in extremely ineffective and inefficient floor plate sizes for the tenant which will fail to meet Sydney Water's stated objectives for a 'best practice' government office facility.
44	Tzannes Associates	Design Response – The building design is not fine as the level of finish is below that anticipated in the Civic Place Masterplan. According to the report accompanying the application prepared by Lincolne Scott the base building is <i>capable of achieving</i> a 4.5 star ABGR rating. To be recognized by industry as a green building a 4.5 ABGR rating should be achieved. An 'exemplar' would lead expectations and would, therefore, require a 5 star ABGR rating or a 6 green star rating. The proposal is not an ESD exemplar. The proposal should be revised to ensure a 4.5 or 5 star ABGR and 6 green star rating <i>is</i> achieved.	The proponent contends that the materials selected are consistent in quality terms with the intent of CPMP 2003 and in keeping with the corporate importance of Sydney Water as a state owned entity The Sydney Water proposal is designed to leading sustainability outcomes including a base building ABGR of 5 Stars and 5 Green Star rating with a minimum credit capacity of 100% for water. The sustainability initiatives will include rain water harvesting, a blackwater recycling plant and chilled beam HVAC technology. This will represent the continuing upwards evolution of NSW Government office facilities and set a high benchmark for the future development of Civic Place.
45	Tzannes Associates	Orientation & Outlook – No analysis is presented to explain the depth, and vertical separation	Lincolne Scott has undertaken significant and conclusive modelling

		of the sun shading in relation to heat load diurnally and seasonally, they may require additional depth and/or adjusted spacing. Despite the carrying angle of the sun and the higher heat load on the eastern and western façade. This aesthetic simplification contradicts any pretence of building design being attuned to environmental factors.	of the passive environmental louvre system included within the design proposal which has been independently evaluated by Sydney Water's consultant team. Refer to the attached data provided in illustration.
46	Tzannes Associates	Pedestrian Access – The unbroken northern glass wall to the foyer would prevent its use for dining and no seating provision is shown on the drawings to provide relaxation.	The proponent's design proposal provides several glazed doors opening onto the northern colonnade and terrace, offering a high level of physical and visual connectivity between the buildings users and the public domain. Smith Street is the buildings address point with an entry point into the buildings reception and public interface area to this side of the building. The foyer café opens onto the external terrace for al fresco dining and seating. Tables and chairs are shown on the DA drawings both internally and externally for this purpose.
47	Tzannes Associates	Crime Prevention – No CPTED report accompanies the application and this is required if the statements made in this report are to be justified. It is strongly urged that an independent CPTED report to be obtained by the consent authority before consideration is given to the application.	Council advised that the CPTED assessment could be prepared by the architect. DCM has provided a CPTED overview within the architectural design statement. If required, further input may be provided at a later stage.
48	Tzannes Associates	Crime Prevention – To the south the railway station and Darcy Street are public places that would benefit from surveillance and none is given.	See Item 47 above.
49	Tzannes Associates	Crime Prevention – There are no activated edges at ground level.	See Item 47 above.

50	Tzannes Associates	Crime Prevention – The proposal limits rather than extends pedestrian permeability between the transport interchange and Civic Place.	See Item 47 above. The proponent's design proposal provides for active frontages on east, west and north with a high level of physical and visual connectivity between the buildings users and the public domain beyond. Smith Street is the buildings address point with an entry point into the buildings reception and public interface area to this side of the building. The foyer café is provided with several door openings providing access to an external seating terrace.
51	Tzannes Associates	Level 01 Floor Plan (A1001) – This plan is lacking in several key respects. The isolation room discharge is not described, for example, what precautions are taken to ensure its safety, this information is required from the proponent prior to consideration can be completed. No indication is given to how the north and west edge of the site will integrate into the future levels of Civic Place. This information is required from the proponent prior to consideration can be completed. The archaeological display in a retaining wall is unlikely to provide an appropriate edge to Civic Place. There appears to be inadequate space between the Colonnade columns and the glass wall to provide for adequate pedestrian movement. The drop off zone to Smith Street has reduced the footpath to an unacceptable narrow width for easy pedestrian movement.	Post submission of the DA, SWC has advised that the Isolation Room discharge is no longer required. The 'selected master plan' was not available for consideration during the design process towards the proponent's DA submission and has not been released in full as has been requested. The proponent is willing to work with the Civic Place developers to achieve integrated design solutions for proposed finishes and levels. The proposed archaeological display locations will need to be coordinated with the Civic Place plaza levels. Pedestrian movement along the terrace is to occur north of the colonnade; the terrace width in this location is approximately 4.5 metres wide. The Smith Street footpath is generally 7.0 metres wide and reduces to 5.0 metres at the drop off zone. The proponent suggests this width is adequate.
52	Grocon	The project description and location describes a 17 storey building (including plant rooms) whereas the construction management methodology describes an 18 storey building. The applicant should be asked to clarify this.	The roof top plant room is double height as per submitted drawings; any confusion through error in description is regretted.

53	Grocon	Two options have been provided for shoring namely, temporary rock anchors and bracing or retaining walls. It is the preference of Grocon as the developer of Civic Place site (and we believe Parramatta City Council, as current owner of that site) that the consent authority require bracing of retaining walls (i.e. option 2).	The proponent's construction representatives met with Council and its development partner on 17 th January 2007 and an 'in principle' agreement with regard to construction matters, including rock anchors, has been reached with mutual rights being envisaged. The proponent can, if consent on these matters is unreasonably withheld, construct the building using alternative construction methods.
54	Grocon	The applicant should be asked to explain how it proposes to deal with the shoring along the western boundary and the interface with 30 Darcy Street footings? It is also necessary for the applicant to confirm that the proposed building design appropriately deals with the future excavation of Civic Place, which extends along 3 boundaries of the Sydney Water site?	See Item 53 above
55	Grocon	The applicant should be requested to explain why the ground floor drawing lodged as part of the construction management plan is not the same as that produced in the design statement and architectural drawings.	The use of different backgrounds for the construction management plan and the design statement is an error; the design statement drawings and architectural drawings submitted with the development application are correct. No changes to the details of the construction management plan are envisaged resulting from the change in drawings.
56	Grocon	Three (3) crane locations have been proposed. The applicant should be requested to nominate its preferred location bearing in mind that some location do not fully cater for the entire building (one of the locations cannot satisfy the lifting options indicated in that it cannot reach Smith Street, which is one of the proposed loading areas). Also the location of the cranes and the potential conflict with the nearby railway infrastructure (including the train lines themselves) needs to be carefully considered.	The proponent's construction representatives met with Council and its development partner on 17 th January 2007 and an 'in principle' agreement with regard to construction matters, including rock anchors, has been reached with mutual rights being envisaged. The proponent can, if consent on these matters is unreasonably withheld, construct the building using alternative construction methods. These 'agreed' matters include crane access issues.
57	Grocon	The applicant should be requested to specify its proposed location of construction zones for crane lifting and materials handling.	Noted.

58	Grocon	The applicant should be requested to specify its proposed means of managing the transportation of men and materials at site and from what level.	Whilst acknowledging concerns on the part of the developer / builder of the proposed Civic Place, the means of managing transportation of men and materials is not for comment by them as all infrastructure is wholly located within the Sydney Water site and governed by the requirements of the OH&S Act
59	Grocon	The applicant should be requested to specify the proposed concrete pumping locations during the different phases of the project.	Refer response to Item 58 above.
60	Grocon	The applicant should be requested to specify its proposed occupational health and safety management of the site activities.	Refer response to Item 58 above.
61	Parramatta Council	City The Sydney Water DA does not achieve the goals of SREP 28, the Stage 1 DA, the draft LEP or the adopted 2003 or winning 2006 Master Plans for Civic Place. The development of the scheme since the Stage 1 DA has resulted in additional floor space and height but with a reduction in amenity, safety, streetscape and visual quality. Further the proposal does not integrate appropriately with the selected master plan under the Parramatta City Council competition/tender process in terms of its alignments, Darcy Street and Smith Street frontage treatments and the location of the tower and core. The Stage 2 DA puts at risk the primary vehicle and service access points for the entire Civic Place project.	The Sydney Water design proposal has been designed within the context of the adopted and gazetted Civic Place Master Plan (CPMP) 2003 and SREP 28. The design guidelines of the Civic Place Master Plan, dated June 2003 was the guiding design document, in conjunction with the statutory controls of the SREP 28 and the design guidelines of the City Centre DCP. The draft LEP and DCP referred to in the commentary had not been released at the time of concept design and are yet to be adopted. The 'selected master plan' was not available for consideration during the design process towards the proponent's DA submission and has not been released in full as has been requested. The additional floor space remains within the available FSA provided by the stage 1 DA consent and the design provides for an outcome exhibiting high design merit and compliance with the objectives of the statutory instruments. The submitted heritage advice comments that the proposed height provides a more suitable response to surrounding heritage items than the height of 24 storeys within the CPMP. The additional height and floor space has no material impact upon

			the adjacent sites. The adopted Civic Place Masterplan 2003 clearly envisaged that Darcy Street be retained in part of its length for the purposes of providing vehicular access to basement parking areas. As such this length of retained roadway was envisaged to function as a service access and drop-off as illustrated in Figure 7.10 of CPMP 2003.
62	Parramatta Council	City	The Sydney Water site is in key location, terminating the vista from Church Street to the right hand side. The Stage 2 DA proposes a building which will fight and erode the strong visual alignment and sense of enclosure created by the other towers in the rest of the site. Further its design does not achieve excellence, particularly as required by the Draft LEP. It is a traditional curtain wall solution which detracts from the ambience, functionality and activation of Darcy Street. The proposed tower turns its back on Darcy Street as the main drop off/pick up zone for the public transport connections and the commercial development to the east of the site. The proponents design proposal is consistent in its orientation to both CPMP 2003 and SREP28 statutory instruments refer to Figure 7.4 of CPMP 2003, Urban Structure Plan. The suggested re-orientation of the Sydney Water will not provide a direct line of site between St John's Church and Lancer Barracks nor improve the sense of containment perceived. The proponent contends that the design resolution developed for the Sydney Water proposal exhibits exceptional design merit and provides a contemporary aesthetic outcome with a high level of embedded ESD initiatives. This will provide a strong cornerstone to the rejuvenation of Civic Place and a building appropriate to the status and importance of Sydney Water as a state owned corporate body. The tower form is articulated in two tall elegant glass forms with a recessed interlayer between the two volumes. The volumes differ in height, stepping down towards Civic Place. The glazed facade is expressed into two storey high modules by a grid of small re-entrants; each module is articulated with horizontal passive solar control louvres. The tower facades are articulated by horizontal passive solar control louvres and recessed feature channels to the curtain wall.

			The adopted Civic Place Master Plan (CPMP) 2003 clearly envisaged that Darcy Street be retained in part of its length for the purposes of providing vehicular access to basement parking areas. As such this length of retained roadway was envisaged to function as a service access. Therefore the use of Darcy Street as an access to the basement car parking for the Sydney water building is consistent with this intent. Furthermore it removes the potential for traffic conflict between vehicular movements from the Civic Place development and Sydney Water on the major roadway of Smith Street.
63	Parramatta Council	City	The proposed design puts in jeopardy the success of the overall Civic Place project in terms of high quality design outcomes, achievement of a safe and enjoyable pedestrian space and traffic access from the east and compromises the entire car parking and service arrangements for the larger site. The key tenancy of Sydney Water will assist in generating a high level of commercial confidence in the Civic Place precinct's future success, as the development of the NSW Police Headquarters and the soon to be complete Parramatta Justice Precinct has for the Parramatta CBD as a whole. The Sydney Water building represents the continuing upwards evolution of both design quality and sustainability outcomes in the delivery of government 'best practice' buildings, drawing from the delivery of the previously mentioned projects by the proponent. The proponent contends that the pedestrian traffic flow envisaged from the Rail Interchange to the main public spaces with Civic Place is north/south between the Sydney water site and that adjacent (to the west). The desire line envisaged is not compromised by the Sydney Water design proposal. The pedestrian circulation patterns illustrated in Figure 7.2 of CPMP 2003 are retained, uncompromised, within the proponent's design proposal for Sydney Water.

64	Parramatta Council	City	The achievement of a high quality outcome for Parramatta requires a coordinated approach. Government offices relocating to the city centre is important and their needs should be accommodated, however this should not be at such a high cost to the remainder of the city centre and particularly to future public space.	The Sydney Water design proposal has been designed within the context of the adopted and gazetted Civic Place Master Plan (CPMP) 2003 and SREP 28. The proponent contends that the design proposal will not have a detrimental impact upon the outcome of the Civic Place development
65	Parramatta Council	City	Rock Anchors, Crane Swings & Hoardings – As adjacent landowner, Council's consent should have been obtained by Sydney Water in relation to rock anchors, crane swings and hoardings as described in the Stage 2 DA. This consent has not been obtained and as such there is no proper development application before the CPPC.	The proponent's construction representatives met with Council and its development partner on 17 th January 2007 and an 'in principle' agreement with regard to construction matters, including rock anchors, has been reached with mutual rights being envisaged. The proponent can, if consent on these matters is unreasonably withheld, construct the building using alternative construction methods. These 'agreed' matters include crane access issues.
66	Parramatta Council	City	Lack of Coordination between the Stage 2 DA & the Selected Master Plan for the Civic Place Site – ▪ The Stage 2 DA for Sydney Water does not integrate in any way with the Parramatta Council winning tender, master plan and the Project Development Agreement (PDA) for the Civic Place site. ▪ These two projects must be coordinated and work together if the SREP 28, LEP and adopted 2006 Civic Place master plan goals are to be realised. ▪ The Stage 2 DA tower position, alignment relative to the civic space and Darcy Street, core design, car park entry, treatment of the ground plane to Station Square, Smith Street and Darcy Road, and lack of setbacks create adverse and detrimental public domain outcomes for the Civic Place site as the focal point for the Parramatta CBD. ▪ This portion of the Civic Place site acts as the main arrival point for pedestrians leaving Parramatta Station and moving from the bus interchange to the northern part of the Parramatta CBD. ▪ The 2006 Civic Place winning master plan has created an urban space as the arrival point to the site — Station Square, which	The 'selected masterplan' was not made available to the proponent during the formulation of the DA submission. The proponent has been provided with a limited amount of information (in late December). The proponent agrees that where reasonably possible, that design coordination can be facilitated between the two projects. The proponent remains willing and available to engage in discussions as necessary to resolve interface issues where such resolution can be achieved without unreasonable compromise to the delivery of a 'best practice' NSW Government office facility for Sydney Water nor the agreed commercial arrangements between the proponent and its tenant. The proponent contends that the design proposal provides for adequate open space within the context of the CPMP 2003. The proponent contends that the pedestrian traffic flow envisaged from the Rail Interchange to the main public spaces with Civic Place

		links into a north south pedestrian link, lower ground level retail concourse and Darcy Street/Smith Street via a drop off and pick up point. ▪ Under this plan Station Square and Darcy Street have been designed and realigned from the current position to enable Darcy Street to provide the main access to the primary commercial tower on the site, the Atria. ▪ The Atria, a 3 pod tower will be the premier tower for all of Parramatta. It has been designed to reinterpret the current Darcy Street alignment as a 5 storey high internal Street which continues from Station Square through the underside of the building linking to Church Street. ▪ Station Square provides a generous public space at the entry to the station, the Atria and Darcy Street and also for the Sydney Water building. ▪ The Stage 2 DA for Sydney Water comprises all these design goals due to the following: - The building location impacts severely on the proposed alignment of Darcy Street and the location of the major service and vehicle ramp for underground parking for the Civic Place development site. - The orientation of the building introduces a alien, skewed alignment relative to the strong orthogonal arrangement of buildings within the Parramatta CBD and the east west axis generated by the winning master plan for the remainder of the Civic Place site. - The Sydney Water parking and service vehicle access has been relocated from Smith Street to Darcy Street which comprises the vehicle access to the rest of the site and detracts from the visual and pedestrian amenity and safety of Darcy Street and Parramatta Station access. - The expansion of the tower in the east west direction and reduction of massing in the north south direction severely	is north/south between the Sydney water site and that adjacent (to the west). The desire line envisaged is not compromised by the Sydney Water design proposal. The pedestrian circulation patterns illustrated in Figure 7.2 of CPMP 2003 are retained, uncompromised, within the proponents design proposal for Sydney Water. The Parramatta Council/Grocon proposed Station Square and Darcy Street realignment have been designed without consultation with the proponent and would appear to ignore the title boundaries of both the Sydney Water and RailCorp land parcels adjacent. Given the uncertainty behind the development of the adjacent (Atria building) site in terms of delivery program (due to the required construction of new Council facilities, pre-commitment by commercial office tenants to the Atria project and no planning approvals for any of this development) it is unacceptable to the proponent and Sydney Water that such a substantial imposition be made on the relevant land parcel and the Sydney Water proposal. The potential for the public open spaces as envisaged in CPMP 2003 as illustrated in Figure 7.5, Public Domain Concept, is maintained without compromise in the Sydney Water submission. The ramping system illustrated in the 'selected masterplan' design assumes partial displacement of both Sydney Water and RailCorp from portions of their respective land holdings. The proponent's design proposal is consistent in its orientation to both CPMP 2003 and SREP28 statutory instruments refer to Figure 7.4 of CPMP 2003, Urban Structure Plan. The adopted Civic Place Master Plan (CPMP) 2003 clearly envisaged that Darcy Street be retained in part of its length for the
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		compromises the proposed Station Square and provides inadequate offset to the Atria commercial tower. - The relocation of the Sydney Water building lift and service core to an external southern façade undermines amenity and passive surveillance of Darcy Street. ▪ The relocation of the building compromises the proposed arrival square from the station and also creates a poor massing and amenity relationship between the Sydney Water building and the future tower on the Civic Place site. ▪ All of the above combine to undermine the use and design of Darcy Street and Station Square as high quality pedestrian and vehicular spaces and in effect causes them to become the back door of the development. ▪ The effect on the main master plan is serious as it will effectively preclude Darcy Street from being able to act as the main entry point and address for the major commercial tower within Civic Place. ▪ This loss of address could require re-negotiation of the Civic Place development agreement and significant redesign of the winning master plan (combined with the vehicular access issues which are discussed later) to a point where there is a risk that many of the Civic Place goals will be lost and the amenity and safety of surrounding public streets compromised. ▪ Further the loss of the major address from Darcy Street and Station Square will compromise the safety and activity of this whole upper plaza area, creating a space that is deactivated and dominated by car parking, building plant and cores. ▪ The flow on effect will be a serious reduction in amenity to the pedestrians coming to the station from the south east and bus interchange, to those being dropped off and picked up in Darcy Street, particularly after hours, loss of surveillance to Parramatta Station and an area that will encourage graffiti and antisocial	purposes of providing vehicular access to basement parking areas. As such this length of retained roadway was envisaged to function as a service access. Therefore the use of Darcy Street as an access to the basement car parking for the Sydney water building is consistent with this intent. Furthermore it removes the potential for traffic conflict between vehicular movements from the Civic Place development and Sydney Water on the major roadway of Smith Street. The proponent contends that the amended building massing is consistent with the intent of CPMP 2003 and will not be detrimental to the development potential of adjacent land parcels. The retained portion of Darcy Street under CPMP 2003 was not envisaged as a pedestrian thoroughfare rather as a service ramp and drop off access point. The Parramatta Council/Grocon proposal retains this activity in this location. The 'Station Square' concept is not detrimentally impacted by the Sydney Water proposal and a vehicular access drop off can be maintained serving the future Atria building. The proponent has concern that the Station Square RL appears to be at 14.5 with little consideration as to the adjacent parcel (Sydney Water) and its pedestrian access from the rail Interchange. The proponent does not wish to make comment on the commercial arrangements between Parramatta Council and its development partner, Grocon. The proponent remains willing and available to engage in discussions as necessary to resolve interface issues where such resolution can be achieved without unreasonable compromise to the delivery of a 'best practice' NSW Government office facility for Sydney Water nor the agreed commercial arrangements between the proponent and its tenant.
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			behaviour.	
67	Parramatta Council	City	Lack of Coordination between the Stage 2 DA & the Selected Master Plan for the Civic Place Site – ▪ SREP 28 CI 17 requires the Civic Place project: - To enhance the Parramatta City Centre as a pre-eminent commercial, retail, community services and cultural tourism centre in the Greater Metropolitan Region. - To enhance access to Parramatta, particularly by public transport, walking and cycling. ▪ The Stage 2 DA compromised the achievement of a holistic and integrated solution for the Civic Place area. ▪ It potentially comprises the achievement of excellence in design as required by the Stage 1 DA approval, SREP 28 and the adopted master plan. ▪ It compromises the amenity and pedestrian linkage requirements in SREP 28 and is in direct contravention of the design objectives within the Stage 1 DA.	The Sydney Water design proposal has been designed within the context of the adopted and gazetted Civic Place Master Plan (CPMP) 2003 and SREP 28. The draft LEP and DCP referred to in the commentary had not been released at the time of concept design and are yet to be adopted. The 'selected master plan' was not available for consideration during the design process towards the proponent's DA submission and has not been released in full as has been requested. The resolution developed for the Sydney Water proposal exhibits exceptional design merit and provides a contemporary aesthetic outcome with a high level of embedded ESD initiatives. The proponent contends that the submitted design exhibits strong design excellence characteristics and will provide a strong cornerstone to the rejuvenation of Civic Place and a building appropriate to the status and importance of Sydney Water as a state owned corporate body. Furthermore the proponent contends that the design maintains the objectives of CPMP 2003 with respect to pedestrian circulation.
68	Parramatta Council	City	Inappropriate Bulk & Floorplate Proportions (setbacks) & alignments) ▪ The Stage 2 DA has changed the tower configuration and bulk from the Stage 1 DA by narrowing the building bulk in the north south direction and elongating it in an east west direction. ▪ Whilst this achieves good northerly light penetration for the commercial floors it results in a side core arrangement and the location of the building much closer to the western boundary of	The Sydney Water design proposal has been designed within the context of the adopted and gazetted Civic Place Master Plan (CPMP) 2003 and SREP 28. The proposal does not compromise the objectives of the statutory instruments nor does the proponent believe that the urban design outcomes will be detrimental to the outcome objectives of Civic Place.

		the Sydney Water site. ▪ This cramps the relationship between the buildings and reduces the spatial quality between the buildings including light penetration and views from the station itself. ▪ The separation between the proposed Sydney Water building and the recently redeveloped Parramatta Station will be in the order of 12 metres. This is significantly less than a standard city street which is normally in the order of 20m. Such a dimension will compromise the proportion and character of Darcy Street as an arrival point and primary address for the main Civic Place site tower. ▪ The Stage DA does not comply with the Building Design Controls of SREP 28, specifically major façade and entry treatments, through site linkages, street alignments, vehicular access points and street wall heights. ▪ The Stage 1 DA for Sydney Water was a double sided commercial building with the core located centrally within the building form. This provided active edges to all sides at ground level other than a narrow extent to the west of the tower. The building alignment was to the street frontages of the adopted master plan (although the Darcy Street alignment now conflicts with the proposed new alignment under the agreed 2006 Civic Place master plan). ▪ The Stage 1 DA provided a building that setback above the podium to both Smith and Darcy Street creating an appropriate human scale, active uses to the street frontage and wind amelioration as well as responding to the lower sale of the building forms on the other side of Smith Street. ▪ The Sydney Water Stage 2 DA erodes these outcomes due to the following: - No podium is provided with the building rising hard from Darcy and Smith Street destroying the human scale	The proposed building is sited within the SWC title boundary and is setback from the western end by approximately 6.1 metres. The separation between the SWC proposal and adjoining structures in Civic Place is yet to be determined. Sunlight access to the Transport Interchange will be aided by the reduced overall height of the building. The 12 metres referred to is the narrowest dimension between the station alignment and the Sydney Water building which occurs at the extreme south west corner on the site. From this point the eastern portion of Darcy Street is of the order of 20 metres wide. The pinch point referred to is set approximately 4 metres inside the proponent's title boundary. The building is designed to present frontages and pedestrian entry points to the major public spaces, as required: The future Civic Plaza to the north and the Smith Street boundary to the east. The western façade at ground level has been designed to include retail space to also provide a presentation to north-south link from the railway station to Civic Place Darcy Street under the CPMP is designated to provide for service delivery points; access to basement parking; and drop/off pick up points and therefore, it is more appropriate to locate service points along the Darcy Street frontage rather than address the future plaza and Smith Street.
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		relationship achieved in the Stage 1 DA and the relationship with adjoining lower scale forms across Smith Street and the new station enclosure itself. - The important southern façade is composed entirely of building plant and lift cores, car park and service entry doors and underground exhaust structures. - The lift cores along Darcy Street in combination with the large car park entry and the location of the car park exhausts destroy any pedestrian amenity along this street, creating a potentially dangerous and unpleasant environment. - The core being on the outside of the building means its visual impact is a major Issue, creating adverse impacts on the entire length of Darcy Street and the view along Station Street from the south east. - The street wall heights are ignored totally with the entire height of the building bearing down on Smith and Darcy Street - with consequent issues for wind turbulence and lack of pedestrian protection as no awnings or other weather protection devices are provided. ▪ The human scale and active frontages are necessary for such a key site and these requirements must not be ignored for the sake of the whole project.	Siting of the building will facilitate the north – south pedestrian link from the railway station to Civic Place and the main east-west link from Church Street to Smith Street. The ground floor level is setback from Smith Street by approximately 4m to allow a sheltered colonnade zone as part of one of the main access points into the building. The colonnade is proposed to the Smith Street frontage which provides for a built form alignment to Smith Street. A setback from the Darcy Street alignment is proposed due to the “skewed” alignment of the Darcy Street property boundary. The proposed ground floor edge will present as a predominantly consistent street edge by the lift core and stair well elements. By following the “skewed” alignment of the Darcy Street boundary, an irregular shaped footprint to the south will result. Vehicular access to the building is limited to one point off Darcy Street, minimising the requirement to provide additional access points to Smith Street. It does not follow that a podium is the only way of achieving appropriate scale within a street. The SWC site is required to stand alone in an arrangement that is also sympathetic and compatible with the overall objectives of the Civic Place Master Plan (CPMP). An external presence is required by SWC whilst engagement with the built form and open space network Civic Place Master Plan (CPMP) is maintained. This network is fundamentally an east west swathe of space that is penetrated by north south crosslinks. The proposal observes these fundamentals. Human scale is basically to scale perceived at
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			ground level. The Darcy Street elevation: – Is architecturally layered into 4 planes (core, foyer, blue box and tower) – Comprises high quality materials (stone, concrete and glass) – Is activated at ground level by extensive windows into busy lobby and foyer zones with further surveillance achieved from upper levels. – Has highly sophisticated strongly articulated and textured architectural expression. – Is part of a strong corner statement that is created to Darcy and Smith Streets providing strong imagery and presence on the south eastern approach to Civic Place. – Creates powerful landmark identity adjacent to Parramatta Station. The local environmental conditions are subject to regulatory assessment which will be carried out as a matter of course. Street wall heights are not applicable to the Civic Place precinct. The Amendment No. 6 Height Map supersedes the City Centre Height Map and the City Centre Special Areas Map.	
69	Parramatta Council	City	Inappropriate Bulk & Floorplate Proportions (setbacks) & alignments) – ▪ The proposal is not consistent with the Stage 1 DA Approval. ▪ SREP (2) Special areas provisions – requires adequate building cartilage and bulk and scale. ▪ SREP 28 sets out specific Building Design Controls for this precinct. They include:	This DA was submitted as a “fresh” new application, despite there being a DA approval for the building envelope on the site. A “fresh” DA has been lodged for the site incorporating the revised floor space and building envelope. In this regard, the relationship of whether the new scheme is consistent with the approved scheme is irrelevant. The submitted heritage advice comments that the proposed height

		- The major façade and entries of building are to address major public places, such as streets, squares, parks and the river. - Through-site pedestrian links are to be made into squares, parks and the river, where applicable. - Buildings are to be built predominately to the street alignment and side boundaries and are to provide continuous Street frontages for enhanced pedestrian amenity. - Space allocated for vehicular entrances is to be minimized, with those entrances provided predominantly from lanes or centres of blocks. - Minimum and maximum street wall heights are set to Smith and Darcy Street of 11m minimum to a maximum of 21.6m. The required tower setback from this is 8m.	provides a more suitable response to surrounding heritage items than the height of 24 storeys within the CPMP. The additional height and floor space (compared to the approved scheme) has no material impact upon the adjacent sites. The ground floor level is setback from Smith Street by approximately 4m to allow a sheltered colonnade zone as part of one of the main access points into the building. The colonnade is proposed to the Smith Street frontage which provides for a built form alignment to Smith Street. A setback from the Darcy Street alignment is proposed due to the “skewed” alignment of the Darcy Street property boundary. The proposed ground floor edge will present as a predominantly consistent street edge by the lift core and stair well elements. By following the “skewed” alignment of the Darcy Street boundary, an irregular shaped footprint to the south will result. The Darcy Street frontage has been designed to accommodate the service functions of the building, given that Darcy Street has been designated in the CPMP to function as a vehicular access point; service and delivery and drop off / pick up point. Service elements in the Darcy Street façade have been designed to feature and integrate as architectural elements. The provision of a main access point into the building via Darcy Street to the “railway walk” contributes to activating the Darcy Street zone. The combined entry/exit vehicular point proposed to Darcy Street minimises the numbers of access points to the site and is located off a street designated under the CPMP for service / vehicular access
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			functions. The width of the entry is required to accommodate all vehicles, including delivery vehicles. This will enable all vehicular activity to be confined to within site.
70	Parramatta City Council	Compromises the Amenity, Safety & Functionality of Parramatta Station & its Environs – ▪ The Stage 2 DA has the entire lift and service core located on the Darcy Street frontage. This side core design is inappropriate for a building in such a prominent and important civic location. ▪ The building design turns its back on Parramatta Station and Darcy Street. ▪ The southern façade is devoid of ground level uses and offers no activation or passive surveillance of the public domain of Parramatta Station. ▪ It removes passive surveillance that might have occurred from the building to the station platform and leaves Darcy Street with no upper level passive surveillance either. ▪ This compromises the amenity and safety of the station as it will not be overlooked at all. ▪ Further it impacts on the view from the station as passengers will be presented with an unappealing solid wall of rifts and plant rather than an active building façade that would otherwise include cafes, convenience stores and other complementary uses. ▪ The loss of active uses to Darcy Street and the impact of the vehicle entry point shifting from Smith to Darcy Street will also erode the functionality of the station and its amenity creating a potentially dangerous space at night and discouraging use of the public transport system. ▪ The large service vehicle and car parking entry to the Sydney	The service core is articulated as nine individual shafts that break free at the top of the building to create a powerful signature on the Parramatta skyline. The side core is a highly favoured contemporary office configuration. SWC have perceived that a central core arrangement is unsuitable for their purpose. The proposed south elevation has more than 40% active building facade. Passive surveillance over Darcy Street will occur as Darcy Street will be an active zone: - The north-south link from the railway station is designated to extend immediately from Darcy Street and extend adjacent to the Sydney Water Building and will accommodate for one of the main access points into the building, therefore providing pedestrian activity. - Vehicular access to the Sydney Water Building is

		Water building will be visible upon exit from the station as it dominates the south west corner and vehicle movements will conflict with the movements of school children and office workers along the northern footpath of Darcy Street. ▪ The Sydney Water Stage 2 DA does not meet the objectives of the approved Stage 1 DA.	proposed from Darcy Street. - Vehicular access to the car park for the Civic Place development, proposed by Grocon is from Darcy Street. - Darcy Street will also function as a drop off and pick up point. The proposed scheme conforms to all of the Stage 1 DA objectives, notwithstanding it is lodged as a “fresh” application.
71	Parramatta Council City	Compromises the Amenity, Safety & Functionality of Parramatta Station & its Environs – SREP 28 Special Areas requirements: ▪ Whether the development improves the functioning of the railway station and its environs as a public transport interchange and will enhance the railway station and adjacent areas as major places of arrival to the Parramatta City Centre. The Stage 2 DA does not achieve these requirements. The Stage 1 DA lists as its design objectives: ▪ Provide a commercial building of design excellence. ▪ Ensure that the proposed development complements the public domain areas on and adjacent to the site. ▪ Protect the important vistas and views through the site (and it lists the views to and from Smith Street and the station as some of these views). The Stage 2 DA compromises these objectives.	The relocation of main government headquarters immediately adjacent to a major transport interchange will significantly enhance the functioning of the Parramatta transport interchange. The proposed siting of the vehicular access point in Darcy Street is designed to ensure that the swept paths of buses are not compromised. Similarly, the operations of the bus corridor along Smith Street will also not be compromised by the location of the vehicular access in Darcy Street. The siting of the building will contribute to the north-south links to the railway station. Formal landscaping within the curtilage of the site, including retailing along the north-south link will provide for pedestrian amenity. Reference to the Stage 1 DA design objectives are irrelevant.
72	Parramatta Council City	Pedestrian Safety & Amenity – ▪ The Stage 2 DA does not satisfy the requirements of SREP 28	The Darcy Street frontage has been designed to accommodate the

		or its own Stage 1 DA design objectives regarding pedestrian safety and amenity. ▪ The Inactive frontage proposed by the lift core, car park exhaust and vehicle entry point in the Stage 2 DA to Darcy Street compromise the safety, amenity and surveillance of Darcy Street, the station and the north south connection to the station. ▪ The location and treatment of the core and the lack of activation to this entire frontage compromises Darcy Street and Smith Street as a major place of arrival ▪ Rather it will create a 'back of house' and service area that is neither appropriate nor necessary if the Stage 1 DA proposal had been adhered to or Sydney Water had negotiated outcomes with the tendered 2006 Civic Place master plan. ▪ The winning design for Civic Place proposes a redeveloped Darcy Street as a new and improved major public space. It also: - Retains and celebrates an important new east and west connection across the city from the Lancer Barracks to Church Street. - Reinforces a north south pedestrian promenade across the city via Station Square which provides a delightful and significant arrival space from the station and Darcy Street. - Celebrates 'arrival' from bus, train, car and taxi to Civic Place. - Locates one major car parking ramp into Darcy Street to minimise impact and number of entry points so that Darcy Street can achieve a positive ambience and sense of address. ▪ If the Stage 2 DA is approved as proposed Darcy Street will become a low order, drop off point and 'service lane'. ▪ In addition the inactive street frontage removes any overlooking, activity or surveillance to Darcy Street.	service functions of the building, given that Darcy Street has been designated in the CPMP to function as a vehicular access point; service and delivery and drop off / pick up point. Service elements in the Darcy Street façade have been designed to feature and integrate as architectural elements. The provision of a main access point into the building via Darcy Street to the "railway walk" contributes to activating the Darcy Street zone. Passive surveillance over Darcy Street will occur as Darcy Street will be an active zone: - The north-south link from the railway station is designated to extend immediately from Darcy Street and extend adjacent to the Sydney Water Building and will accommodate for one of the main access points into the building, therefore providing pedestrian activity. - Vehicular access to the Sydney Water Building is proposed from Darcy Street. - Vehicular access to the car park for the Civic Place development, proposed by Grocon is from Darcy Street. - All floors of the proposed tower overlook both Darcy Street and the station - Darcy Street will also function as a drop off and pick up point. Smith Street frontage includes the ground floor lobby area and accommodates one of the main pedestrian access points. The glazed façade along the extent of Smith Street and colonnade zone provides for an active street frontage. Reference to the Stage 1 DA design objectives are irrelevant.
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		▪ The approved Stage 1 DA provided such uses as cafes and lobbies to all frontages. Darcy Street was to have lobby access and retail frontages with retail frontage also to Smith Street. ▪ The Stage 2 DA provides none of these uses to Darcy or Smith Street. ▪ The Stage 2 DA does not provide weather protection for pedestrians in Darcy Street or patrons leaving or entering the station. Significant and potentially hazardous downdraughts will be experienced at the base of the Sydney Water building due to the absence of awnings, canopies or colonnades on the western and southern facades. ▪ The effect will discourage pedestrians from using Darcy Street as there will be a reduction in perceived safety, amenity and an increase in the perception of potential pedestrian vehicle conflict. ▪ The lack of surveillance will also encourage antisocial behaviour and damage to the rear façade.	No evidence is provided to support the presumption of significant and potentially hazardous downdraughts however the local environmental conditions are subject to regulatory assessment which will be carried out as a matter of course. Darcy Street will be a safe and environmentally friendly area for pedestrians. All necessary measures will be undertaken to create a safe environment and building materials that will resist deformation. SWC's one stop shop (its public face) is across the entire frontage to Smith Street, Civic Place and Station Square; and turns the corner into Darcy Street, which is further supplemented by the large windows into the lift lobbies and the ground floor foyer. In addition to this all floors within the podium and tower have surveillance over Darcy Street and the station.
73	Parramatta Council	Pedestrian Safety & Amenity – ▪ SREP 28 requires development to improve pedestrian amenity with clear and easy access to and from the railway station. ▪ SREP 28 - CI 14 - Planning aims h) requires proposal to improve the quality of urban design and ensure the public domain is safe and attractive.	Refer to Item 72 above.

		▪ SREP 28 - Cl 17 c) requires development to encourage and protect accessible city blocks by providing active Street frontages for streets and a network of pedestrian friendly streets, lanes and arcades. ▪ Parramatta Public Domain Strategy also requires three under Cl 4.7 City access - pedestrian network that existing laneways and informal pedestrian networks be protected and priority given the pedestrians with development expanding and enhancing that network. ▪ City Access clause 4.8 requires development to enhance safety and implement safety by design principles. ▪ The configuration of the tower, the location and width of the vehicle entry and side core compromises this amenity. The Stage 1 DA lists as its design objectives: ▪ Ensure that the proposed development complements the public domain areas on and adjacent to the site. ▪ Ensure that pedestrian linkages can be provided through and adjacent to the site. ▪ The insets to the core have been provided to try and ameliorate the very poor design outcome and to reduce bulk. They are not effective and will provide opportunities for concealment. ▪ The proposal also includes a drop off area to the Smith Street frontage of the Sydney Water building. ▪ This in combination with the columns from the tower and the location of the glass line of the building results in a very tight footpath area that again compromises use of Smith Street for pedestrians moving north south. ▪ Access to the Sydney Water building by the	The service core is articulated as nine individual shafts that break free at the top of the building to create a powerful signature on the Parramatta skyline. Refer also to the CPTED report. The drop off area on Smith Street provides vehicular access to the main street front entry to SWC's headquarters. The Smith Street footpath is generally 7.0 metres wide and reduces to 5.0 metres at the kerbside drop off; the tower columns are located within this zone. The proponent suggests this width is adequate. The proposal fully complies with the requirements of Australian
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			disabled and infirm is inadequate. The proposed car park ventilation shafts, architectural display wall and stepped terraces around the northern and western facades of the building will relegate disabled access to the southwest and northeast corners only. Such an arrangement does not meet the spirit or requirements of the Disability Discrimination Act.	Standard AS 1428 Parts 1-4, the Building Code of Australia and the objectives of the Disabled Discrimination Act.
74	Parramatta Council	City	Architectural Merit & Materials – ▪ The architectural character of the building does not meet the standards set by SREP 28. ▪ The tall lift towers are devoid of interest despite the small insets, are clad in concrete that is ‘coloured’ sandstone colour. ▪ The large expressed columns squeeze the width of the adjacent public domain and footpaths to Smith Street and reduce the exposure of the entry or any retail or commercial tenancies from Smith Street which will affect their viability. ▪ The strong horizontal emphasis of the design robs the building of elegance or the architectural excellence needed in a building in this location of the site. ▪ Such a key location requires materials and design of the highest quality and standard rather than a building which ignores its ground plane and southern relationships and created a less than inspiring architectural solution overall. ▪ To achieve these aims the Stage 1 DA provided a 3 level podium to create an appropriate street level scale. ▪ All street frontages were to be aligned to boundaries (and with the appropriate land swap with Council this is still a sound principle for the new alignment of Darcy Street and Civic Place itself) with activities to all frontages and awnings provided for weather protection.	The architectural character meets all of the objectives set by SREP 28. The service core is articulated as nine individual shafts that break free at the top of the building to create a powerful signature on the Parramatta skyline. The Smith Street footpath is generally 7.0 metres wide and reduces to 5.0 metres at the kerbside drop off; the tower columns are located within this zone. The columns emphasise the entry and allow the ground plane to flow into the foyer of the building. Rather than squeeze the footpath, the columns in fact embrace the public domain and blur the public / private interface creating greater transparency and accessibility. The tower form is articulated in two tall elegant glass forms with a recessed interlayer between the two volumes. The volumes differ in height, stepping down towards Civic Place. The glazed facade is expressed into two storey high modules by a grid of small re-entrants; each module is articulated with horizontal passive solar control louvres. The building design is to an award winning standard.

		The Stage 2 DA achieves none of these outcomes.	Materials (natural stone, concrete and glass) are commensurate with recent contemporary buildings completed in Parramatta and Sydney's CBD. Street scale has been addressed in items above. The suggestion of a land swap between SWC and PCC is beyond our scope and ignores the fact that the proposal is designed orthogonally to our street frontages and boundaries as advocated in the CPMP 2003. The Stage 2 DA achieves all of the outcomes proposed in SREP 28.
75	Parramatta Council City	Architectural Merit & Materials – SREP 28 requires development to comprise buildings of exceptional architectural merit that are: - Articulated, - Visually interesting, - Innovative. - Energy efficient and water efficient and - That responds to and is sympathetic to heritage buildings on and in the vicinity of the site. ▪ Further it requires the use of materials that are robust and combined with the proposed colour scheme, recognise the heritage significant of the site and that complement the exceptional architectural merit of the new buildings. ▪ The design the Stage 2 DA does not achieve these objectives or the Stage 1 Design objectives.	The Sydney Water proposal is designed to leading sustainability outcomes including a base building ABGR of 5 Stars and 5 Green Star rating with a minimum credit capacity of 100% for water. The sustainability initiatives will include rain water harvesting, a black water recycling plant and chilled beam HVAC technology. This will represent the continuing upwards evolution of NSW Government office facilities and set a high benchmark for the future development of Civic Place. The submitted heritage advice comments that the proposed height provides a more suitable response to surrounding heritage items than the height of 24 storeys within the CPMP. The sandstone clad colonnades and sandstone coloured core shafts are a design response to local heritage buildings within the Parramatta region. As outlined in the above items the proponent's proposal achieves design excellence and fully meets the guidelines and objectives of the SREP 28.

		The Stage 1 DA lists as its design objectives: ▪ Provide a commercial building of design excellence.	
76	Parramatta Council	City Urban Design & Built Form Incompatible with 2003 Civic Place Master Plan – ▪ The Stage 2 DA comprises a 16-storey building located at the corner of Smith Street and Darcy Street This is the highest point in Parramatta CBD and a prominent location terminating vistas from the north and west.	The heights and floor space of the CPMC are found within the building mass diagram and are not identified as “minimum”. Maximum height and floor space are contained within SREP 28, in which the proposal complies. The proposed building is higher by 2 storeys compared to the previously approved building. The submitted heritage advice comments that the proposed height provides a more suitable response to surrounding heritage items than the height of 24 storeys within the CPMP.
77	Parramatta Council	City Urban Design & Built Form Incompatible with 2003 Civic Place Master Plan – ▪ The building as designed does not meet the urban design and height objectives of the 2003 Civic Place Master Plan.	The development represents appropriate urban design measures and heights: – The submitted heritage advice comments that the proposed height provides a more suitable response to surrounding heritage items than the height of 24 storeys within the CPMP. – The additional height and floor space has no material impact upon the adjacent sites. – The nett impacts of overshadowing in mid-winter compared to the original scheme are insignificant. No material increase in sunlight loss over the railway station or the Lancer Barracks will occur as a result of reduced separation distances between buildings. – The ground floor level setbacks from all street frontages are appropriate by incorporating colonnade zones as part of one of the main access points into the building. A setback from the Darcy Street alignment is required to

			compensate the “skewed” alignment of the Darcy Street property boundary. – Passive surveillance over Darcy Street will occur as Darcy Street itself will continue as an active zone. SWC’s one stop shop (its public face) is across the entire frontage to Smith Street, Civic Place and Station Square; and turns the corner into Darcy Street, which is further supplemented by the large windows into the lift lobbies and the ground floor foyer. In addition to this all floors within the podium and tower have surveillance over Darcy Street and the station – The Darcy Street frontage has been designed to accommodate the service functions of the building, given that Darcy Street has been designated in the CPMP to function as a vehicular access point; service and delivery and drop off / pick up point.. – Service elements in the Darcy Street façade have been designed to feature and integrate as architectural elements. – The provision of a main access point into the building via Darcy Street to the “railway walk” contributes to activating the Darcy Street zone.
78	Parramatta Council	City	Floor Space Ratio (FSR) & Height do not Comply – ▪ The Stage 2 DA results in an increase in floor space from 24,760sqm to 27,212sqm i.e. an increase of 2, 452sqm, but still well short of the master plan height and building bulk but greater than that approved under the Stage 1 DA. ▪ Increase in height from 15 storeys to 17 storeys (from RL- 82.8 to RL 90.20). Again still well Short of Master plan height of 24 storeys. ▪ The amendments to the envelope since the Stage 1 DA result in poor outcomes and adverse impacts and therefore should not be The heights and floor space of the CPMC are found within the building mass diagram and are not identified as “minimum”. Maximum height and floor space are contained within SREP 28, in which the proposal complies. This is exemplified in the previous consent granted for the site, which had less floor space (2,452sqm less) than the proposed building and is lower by 2 storeys compared to the proposed height. The submitted heritage advice comments that the proposed height

			approved. ▪ The additional massing results in a reduction in public open space and amenity rather than increasing the presence of the tower as a terminating form in Civic Place.	provides a more suitable response to surrounding heritage items than the height of 24 storeys within the CPMP. The additional height and floor space has no material impact upon the adjacent sites. The stepping of the two tower volumes creates a better design solution for Civic Place in that the shorter of the two volumes which fronts the plaza will be less overpowering than the 24 storey height limit proposed in the CPMP 2003, this height also coincides with the tower height proposed in the Stage 1 DA. The narrowing of the tower creates additional space in the main plaza. A ground level comparison study shows that the Stage 2 DA proposal will increase public open space and amenity within SWC site and Civic Place.
79	Parramatta Council	City	Floor Space Ratio (FSR) & Height do not Comply – ▪ The Stage 2 DA contravenes the Stage 1 DA approval and the requirements of the adopted master plan by an increase in FSR and height over the Stage 1 but still under the master plan requirements. ▪ Additional height and FSR should not be considered when the Stage 2 DA has not met the amenity and design standards required under the instruments and the Stage 1 DA.	This DA was submitted as a “fresh” new application, despite there being a DA approval for the building envelope on the site. A “fresh” DA has been lodged for the site incorporating the revised floor space and building envelope. In this regard, the relationship of whether the new scheme is consistent with the approved scheme is irrelevant.
80	Parramatta Council	City	Mixed Use Zone B4 – ▪ The Sydney Water DA 2 does not meet the objectives of the Mixed Use Zone B4 as it delivers poor amenity and discourages walking along Darcy Street to the station. This discourages patronage of the rail station from the south east. ▪ The Stage 2 DA again compromises the objectives of the Mixed Use Zone B4 as the design of the building degrades the	The Mixed Use Zone B4 relates to the draft LEP, which was not applicable at the time of lodgement of the DA.

			character of the public domain and pedestrian links due to: - the lift core being hard to Darcy Street, - there being no passive surveillance or active uses along Darcy Street - The significant pedestrian conflict caused by the car parking entry location and width; and - The expansion of the building into the proposed Station Square which is a major north south pedestrian link from the Station to the north of the CBD.	
81	Parramatta Council	City	Mixed Use Zone B4 – ▪ Mixed Use Zone B4 - states under its objectives that “development is to integrate suitable business, office, residential, retail and other development in accessible locations so as to maximize public transport patronage and encourage walking and cycling”. ▪ Mixed Use Zone B4 states and an objective “To create opportunities to improve the public domain and pedestrian links within the Mixed Use Zone”.	The Mixed Use Zone B4 relates to the draft LEP, which was not applicable at the time of lodgement of the DA.
82	Parramatta Council	City	Protection of Character of Special Areas – ▪ The Stage 2 DA, for all of the reasons noted in 10.0 above does not achieve this objective, Further it puts at risk the design for the Civic Place site itself due to the location of the building and its impact on the proposed access arrangements for vehicles and servicing within Darcy Street.	The proposal will represent an architectural design response to the civic character of the Civic Place precinct. The building will convey the civic nature of the Sydney Water Corporation within a contemporary, unique building form; whilst respecting the context of the urban surrounds. The proposed access arrangement from Darcy Street is designed to ensure that access is not compromised to the balance of the Civic Place precinct and is limited to a singular location that will contribute to the achieving pedestrian active frontage to Smith Street. As described in items above, the Darcy Street frontage is activated at

			ground level in addition to the servicing functions described.
83	Parramatta Council	City Protection of Character of Special Areas – ▪ The Draft LEP states, as an objective – “To protect and enhance the unique qualities and character of the special areas within the Parramatta City Centre”.	The draft LEP is not applicable as the DA was lodged prior to release of the draft LEP.
85	Parramatta Council	City Design Excellence – The draft LEP requires that the consent authority not approval unless development exhibits design excellence. This is measured by the consent authority having regard to a number of matters including: ▪ A high standard of architectural design and materials; ▪ Whether the form and appearance improves the quality and amenity of the public domain; ▪ Whether it impacts detrimentally on view corridors; and ▪ How the development addresses streetscape constraints, relationship to other towers (setbacks, separation, amenity and urban form), bulk and massing, street frontage heights, pedestrian permeability and impacts on the public domain.	The draft LEP is not applicable as the DA was lodged prior to release of the draft LEP.

86	Parramatta Council	City	Inappropriate Location of the Vehicle Entry Point & Excessive Width in Darcy Street – ▪ The re-location of the Sydney Water entry point away from Smith Street and into Darcy Street forces a greater number of traffic movements into the internal street system. ▪ Ideally Sydney Water should take advantage of the Civic Place proposal to share access in a Darcy Street portal with the main development for both parking and servicing and access to retail. ▪ Further the Stage 1 DA provided a 6.8m driveway access to Smith Street. The current proposal has provide a 10m wide carpark entry on the visual axis with pedestrians exiting Parramatta Station to the square and interrupting pedestrian desire line along the edge of the building connecting with Darcy Street.. The 10m width which is visually unattractive, interrupts unreasonably pedestrian footpath areas and does not comply with the requirements of SREP 28. ▪ Relocation of the vehicle entry from Smith Street into Darcy Street Plan portal location as well as being on the major visual axis for pedestrians from the station. ▪ The additional traffic imposed on the Smith/Darcy Street intersection will adversely impact on the accessibility of vehicles and pedestrians from the east into Civic Place and drop off for the Rail Interchange. There has been no modelling provided with the Stage 2 DA which reflects this increased vehicular movement.	The combined entry/exit vehicular point proposed to Darcy Street is located east of the north-south link such that there is no conflict between pedestrians and traffic. The width of the entry is required to accommodate all vehicles, including delivery vehicles. This will enable all vehicular activity to be confined to within site. Vehicular entry off Smith Street is impractical due to the design constraints to the Smith Street façade and the traffic flows along Smith Street. Section 6.13 of the CPMC states the Darcy Street will provide for servicing and car parking access to the Civic Place site. In this regard, the proposed access to the Sydney Water building is consistent with the CPMC. Design and timing constraints also provide an outcome that access from Darcy Street is the most appropriate outcome.
87	Parramatta Council	City	Inappropriate Location of the Vehicle Entry Point & Excessive Width in Darcy Street –	Refer to Item 86 above.

		SREP 28 requires vehicle entry points to be minimised with a width of 3-6m and to minimise their vehicle impacts.	
88	RailCorp	Noise & Vibration – RailCorp is concerned that the future occupants of the development will encounter rail-related noise and vibration from the adjacent rail corridor. Rail noise and vibration can seriously affect the amenity and comfort of residential and other land use types, and jeopardise the structural safety of buildings. As such, rail noise and vibration should be addressed early in the development process. In assessing the application, Council is encouraged to adopt the recommendations given in Part B - Development Assessment Process of the Guidelines for Councils. Section 11 of the Guidelines for Councils provides recommended conditions of consent for specific development categories such as multi-unit residential within the acoustic assessment area. Council should extract the relevant conditions from this section and insert in the development consent. Alternately, Council could impose the following condition of consent: ▪ <i>An acoustic assessment is to be submitted to Council prior to the issue of a construction certificate demonstrating how the proposed development will comply with RailCorp's Interim Guidelines for Applicants in the consideration of rail noise and vibration from the adjacent rail corridor.</i>	Noted, we are in discussions with RailCorp and will continue liaison with them on any impact of the Sydney Water proposal on existing usage and / or the potential future development of the rail corridor.
89	RailCorp	Stray Currents & Electrolysis from Rail Operations – Stray currents as a result of rail operations may impact on the structure of the development. Electric currents on overhead wiring pass through the train's motor and return to the power substation via	As per item 88.

		the rail tracks. Occasionally, these currents may stray from the tracks and into the ground. Depending on the type and condition of the ground, these may be passed to the nearest conductive material (concrete reinforcement, piling, conduits, pipework and earthing rods) accelerating corrosion of metals and leading to concrete cancer. Therefore, the Applicant should consider this possible impact, and engage an expert consultant when designing its buildings. It is requested that Council impose the following condition of consent. ▪ <i>The Applicant is to procure a report on the Electrolysis Risk to the development from stray currents, and the measures that will be taken to control that risk. The Applicant is advised to consult an Electrolysis expert. The expert's report must be submitted to RailCorp for review by the Senior Electrolysis Engineer or nominated Electrolysis Section personnel.</i>	
90	RailCorp	Use of Lights and Reflective Materials – It is essential that lights and reflections do not distract train drivers in the course of their Job. ▪ <i>The Developer must submit any proposals to RailCorp for the use of lights, signs and reflective materials, whether permanent or temporary, in the proximity of the RailCorp's facilities prior to commencing work.</i>	As per item 88.
91	RailCorp	Crane & Other Aerial Operations – During construction, the use of cranes and other equipment capable of intruding into the airspace above the corridor and of operating over any overhead wiring or transmission lines must be strictly controlled. The developer must demonstrate to the satisfaction of RailCorp that all crane and other overhead operations are properly managed, and enter into an agreement with RailCorp for such operation. It is requested that Council impose the following condition of consent.	As per item 88.

		▪ <i>The developer is required to submit to RailCorp a plan showing all craneage and other aerial operations for the development</i> ▪ <i>No crane or other aerial equipment is to be operated within a vertical envelope defined as three (3) metres (horizontally) from any electrified infrastructure. The developer will be required to gain approval, in the form of a Standard Waiver, from Rail prior to use, for any such intrusions into the corridor.</i> ▪ <i>No loads will be permitted to pass over any overhead wiring or transmission lines at any time.</i>	
92	RailCorp	Future Rail Works – In many instances, RailCorp are in the process of developing proposals for future rail facilities to meet existing and future rail demand. Some of these proposals may impact on developments adjoining the rail corridor. It is requested that council impose the following condition of consent. ▪ <i>Council is advised that the proposed development on this site is likely to be affected by the proposed Epping to Parramatta rail link with regard, but not limited to rail noise and vibration and visual impacts. While this project is currently deferred, it may proceed in the future. Council is requested to attach an advisory note on any approval that alerts the Applicant and future occupiers to this proposal and advises that any noise and vibration and electrolysis reports conducted towards the development application should also consider a future increase of degree and type of rail-related noise and vibration.</i>	As per item 88.
93	RailCorp	It is asked that Council forward to RailCorp a copy of the final development consent to enable RailCorp to monitor the applicant's compliance with rail related conditions of consent.	Noted

