

PCU026663

Your Reference: MP10_0171
Our Reference: NCA/23/2010
Contact: David Little
Telephone: 9806 5481
Fax: 9806 5901

Director, Urban Assessments
Department of Planning & Infrastructure
GPO Box 39
Sydney NSW 2001

Attention: Kate MacDonald

4 October 2011

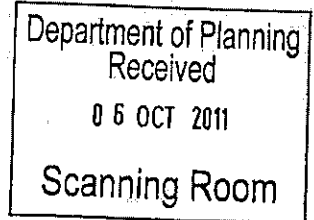
Dear Ms MacDonald,

**Major Project 10_0171 (330 Church Street, Parramatta)
Mixed use residential, retail and commercial development**

I refer to the public exhibition of the above Major Project that seeks approval for the demolition and construction of a mixed use residential, retail and commercial development with basement carparking.

I wish to advise that Parramatta City Council have reviewed the Major Project application and has identified issues with the proposed development. These issues include:

- The public domain interface;
- SEPP 65 compliance;
- Solar access;
- Streetscape and design;
- Deep soil;
- Flooding and parking;
- Heritage.



These issues are discussed in further detail within this submission.

Urban Design Comments

The proposed development was the subject of a Design Competition and Parramatta Council reviewed the competition brief and Council's Senior Urban Designer was a member of the jury.

Parramatta City Council has prepared 'Riverbank Site Controls' that prescribe Parramatta City Council's requirements regarding the public domain interface for this high profile site. The design guidelines were incorporated into the design competition brief and must be considered by the Department of Planning & Infrastructure in its assessment of the Project Application.

Relevant Guidelines and Planning documents referred to include:

If you do not understand this letter, please ring the Telephone Interpreter Service (131 450) and ask them to contact Council (9806 5050). Office hours are 8.30am to 4.30pm, Mondays to Fridays.

ARABIC

إذا لم تستطع فهم هذه الرسالة، الرجاء الاتصال بخدمة الترجمة الهاتفية على رقم ١٣١ ٤٥٠ وأسألهم أن يتصلوا بالبلدية على رقم ٩٨٠٦ ٥٠٥٠. دوام ساعات العمل هي من الساعة ٨:٣٠ صباحاً إلى ٤:٣٠ بعد الظهر من الاثنين إلى الجمعة.

CHINESE

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CROATIAN

Ako ne razumijete ovo pismo, molimo nazovite Službu prevodilaca i tumača (Translating and Interpreting Service – na broj 131 450) i zamolite ih da nazovu Općinu (na 9806 5050). Radno vrijeme je od 8.30 ujutro do 4.30 popodne, od ponedjeljka do petka.

FRENCH

Si vous avez des difficultés à comprendre cette lettre, vous pouvez contacter le service d'interprètes par téléphone au 131 450 et leur demander de contacter la mairie (Council) au 9806 5050. Les bureaux de la mairie sont ouverts du lundi au vendredi de 8h30 à 16h30.

GERMAN

Wenn Sie diesen Brief nicht verstehen können, rufen Sie bitte den Telefon Dolmetscher Dienst (Telephone Interpreter Service) (131 450) an und lassen Sie sich vom Personal mit dem Gemeinderat (Council) in Verbindung setzen (9806 5050). Geschäftsstunden sind von 8:30 bis 16:30 Uhr, montags bis freitags.

GREEK

Αν δεν καταλαβαίνετε αυτό το γράμμα, σας παρακαλούμε να τηλεφωνήσετε την Τηλεφωνική Υπηρεσία Διεμνηνέων (131 450) και να τους ζητήσετε να επικοινωνήσουν με το Δημοτικό Συμβούλιο (9806 5050). Τα γραφεία του είναι ανοιχτά από τις 8.30 πμ μέχρι τις 4.30 μμ, από Δευτέρα μέχρι και Παρασκευή.

HINDI

अगर आप इस पत्र को पढ़कर समझ नहीं पाते हैं तो टेलीफोन अनुवादक सेवा (फोन नंबर १३१ ४५०) को फोन कीजिए और उन्हें काउंसिल (फोन नंबर ९८०६ ५०००) से बात कराने के लिए कहिएगा। ऑफिस का समय प्रातः ८:३० से सायं ४:३० बजे प्रतिदिन सोमवार से शुक्रवार ।

ITALIAN

Se non comprendi questa lettera, telefona al Servizio traduzioni e interpreti al numero 131 450 chiedendo di essere messo in contatto con il Comune (telefono 9806 5050). Orario d'ufficio: ore 8.30-16.30, dal lunedì al venerdì.

KOREAN

만일 이 편지를 이해하지 못하시면, 전화 통역 서비스 (131 450)에 전화하여 카운슬(9806 5050)에 연락해 달라고 부탁하십시오. 근무 시간은 월~금, 오전 8시 30분부터 오후 4시 30분까지입니다.

MALTESE

Jekk na tifhimx din-l-ittra, jekk jogħġbok ċempel lis-Servizz ta' l-Interpretu (131 450) u itlobhom biex jikkuntatjaw lill-Kunsill (9806 5050). Il-hinijiet ta' l-Uffiċċju huma mit-8.30 a.m. sal-4.30 p.m., mit-Tnejn sal-Ġimgħa.

POLISH

Jeśli nie rozumiesz treści niniejszego pisma, zadzwoń do Telefonicznego Biura Tłumaczy (Telephone Interpreter Service) pod numer 131 450 i poproś o telefoniczne skontaktowanie się w Twoim imieniu z Radą Miejską pod numerem 9806 5050. Godziny urzędowania: 08.30-16.30 od poniedziałku do piątku.

SPANISH

Si Ud. no entiende esta carta, por favor llame al Servicio Telefónico de Intérpretes (131 450) y pídales que llamen a la Municipalidad (Council) al 9806 5050. Las horas de oficina son de 8:30 am a 4:30 pm, de lunes a viernes.

TAGALOG

Kung hindi ninyo maunawaan ang liham na ito, tawagan lamang ang Telephone Interpreter Service (131 450) at makiusap na makipag-alam sila sa Konseho para sa inyong kapakanan (9806 5050). Oras ng trabaho 8.30 n.u. hanggang 4.30 n.h., Lunes hanggang Biyernes.

TURKISH

Bu mektubu anlayamazsanız, lütfen Telefonla Tercüme Servisi'ne (131 450) telefon ederek, Belediye ile (9806 5050) ilişkiye geçmelerini isteyiniz. Çalışma saatleri Pazartesi — Cuma günleri arasında saat sabah 8.30'dan öğleden sonra 4.30'a Kadardır.

VIETNAMESE

Nếu quý vị không hiểu thư này, xin điện thoại Telephone Interpreter Service (Dịch Vụ Thông Ngôn bằng Điện Thoại) ở số 131 450 và nhờ họ liên lạc với Council (Hội Đồng) số 9806 5050. Giờ Làm Việc từ 8 giờ 30 sáng đến 4 giờ 30 chiều, Thứ Hai đến Thứ Sáu.

National Relay Number: 133 677

Callers who are deaf or have a hearing impairment or speech/communication impairment may call through the National Relay Service using modem or textphone (TTY) by dialling 133 677 and quoting Parramatta City Council's Customer Service Number, 9806 5050.

- The Riverbank Site Controls 2010
- The Parramatta City Centre Lanes Policy and Parramatta City Centre Lanes Strategy
- The Riverbank Urban Design Strategy
- The Parramatta City Centre DCP 2007

Clarity of Information Included on Plans

Some of the plans submitted with the application are deficient in information;. The following examples are noted:

- The exiting and changed ground levels should be noted comprehensively on all plans and documentation submitted with the proposal (only some are annotated and it's not clear whether they are new or existing).
- The finishes and materials should be noted on all of the elevation plans (presently they are not and there is only a general key).
- The plans should include figured dimensions.

It is also noted that there are several assertions made in the applicants submissions about aspects that could result in good design and construction, but there is no guarantee that this will be provided at this point in time.

Such statements include '*we would expect to work collaboratively with the proponent and authorities to identify a suite of active sustainability initiatives....these could include on site rain water harvesting and re-use, solar hot water heating, and PV solar electricity*' and '*a combination of fixed and operable external sun-shading devices in combination with high performance solar glazing units ensures the building will meet mandated energy use requirements*'.

As the sun-shading devices are not identified on the elevations there is no certainty at present about the effectiveness of the devices for their particular orientation, the final extent of operability and durability, the final appearance of the building or whether they could indeed be omitted during construction for cost reasons. Given the large extent of east and west facing apartments and the height of the towers, the sun shading is a key factor in the amenity provided and there should be greater clarity and certainty about how it will be provided.

Similarly, the SEPP 65 statement claims that deep soil will be provided by the 12m setback to the river. This is another example of a claim for future amenity without proper resolution or certainty. The landscaped area will comprise a considerable amount of retaining walls with extensive footings and terraced and paved areas and the available soft landscaping will be much reduced.

Consistency with Design Competition Scheme Comments

The architect, Tony Caro, has certified that the scheme is principally the same as the proposal which won the Design Competition. Parramatta City Council's review has

established that the scheme submitted with the Project Application is approximately 14 metres higher than the scheme presented at Design Competition Stage.

Height

The eastern tower is 29.6 metres higher than permitted by the height controls of the City Centre LEP 2007. This is a significant variation to the height controls and is also inconsistent with the height endorsed in the Design Competition.

The rationale provided by the proponent for the additional height is that it allows more slender towers with better appearance and more sustainable section, whilst achieving the permitted FSR. The location of the tallest tower also reinforces the city structure.

The architecture of the towers looks to be well thought through in terms of the location of the tallest tower, the slender vertical forms, the orientation facing up and down the river and to provide interesting, dynamic forms.

The taller tower will however result in greater overshadowing during the winter months. From an urban design perspective, the additional height is not desirable (due to overshadowing impacts) but is not unacceptable. If the Department of Planning & Infrastructure were to be of a mind to consider the additional height, then Parramatta City Council would require the proponent to provide some additional public benefit to be returned to the city. It is suggested that the proponent should be encouraged to commence discussions with Parramatta City Council on entering into a Voluntary Planning Agreement.

Materials

The materials palette of precast concrete panels, anodised aluminium and coloured glazing seems appropriate and appealing. With such extensive areas of painted concrete the use of a penetrating paint, instead of plastic paint that will eventually peel is strongly supported.

Streetscape

The podium generally complies with the streetscape requirements except for the south western corner as noted below. The podium appears to measure 12.8metres at the south western corner which exceeds the DCP street frontage requirement of maximum 12 metres high. (Please note - actual levels at building edge and ground level are not noted on plans). This is the corner that interfaces with adjoining buildings in Church Street and the applicant should demonstrate a good relationship to the adjacent elevation.

It is in section and at ground level that the proposal is not satisfactory and does not comply with council's requirements. Further commentary on this is discussed in the 'public interface' section. There are many issues associated with this, a key issue being that the floor levels of the retail to Church Street and the riverfront, together with the public domain colonnade area have been set far too high to achieve a good or satisfactory interface with the proposed future public spaces of this area. This will

create difficulties in achieving public access and DDA compliant access between the foreshore and Church Street.

The plan and elevation to the proposed future lane to the south of the development should be designed to enable this edge to present as an active frontage to the lane (should it be built in the future). The current proposal is for a solid and blank wall that would not allow this to be achieved.

Under Principle 7 of the 'SEPP 65 Design Verification Statement' it is claimed that this wall has been designed to facilitate activation of the future lane but no explanation is provided on this issue and the plans do not show this to be the case.

SEPP 65 Design Verification Statements

Generally, the apartments satisfy the SEPP 65 guidelines regarding solar access (the applicants have chosen the 2 hour measure claiming the site as a dense urban area - more typically a 3 hour measure is used), cross ventilation and kitchen location except for the following:

- Apartment type A-17 is 9 metres deep and the guideline requires a maximum depth of 8 metres for a single orientation apartment.
- Above level 3 these apartments are missing a kitchen (it is assumed this is a graphic error, but needs to be resolved).
- Generally, the balconies are also small across all the apartment types. The guideline requires a minimum 2 metre dimension, many balconies have 2 metres as the maximum dimension. It is also noted that 2 apartments have no balcony. Amendments need to be made to these apartments to add balconies.
- It is also recommended that an additional window be incorporated into apartment type A04 (28 in total) to enable compliance as a double orientation apartment as the existing window in the bathroom is very small. The other areas in the apartments are generous and well laid out.

Public Domain Interface

The large building is located on a key site as nominated in the City Centre LEP 2007 and has 4 public domain interfaces being: Church Street, the riverbank foreshore, the proposed new public square to the east and the proposed new lane to the south.

Good public domain interface is crucial for the future success of this pivotal site between the river and the city on the main north south street. The requirement for good interface with the surrounding public domain areas is required in many parts of the Parramatta City Centre DCP. The unusual configuration of the site and topography requires these matters to be addressed with particular care. The following sections of the City Centre DCP have not been satisfactorily achieved and require further resolution; 3.1 (L); 3.4(G), 3.5(G), 3.11(C), 3.12(A), 7.3(C), 7.3(E). The resolution to these matters lies in proper resolution of the public domain interface as suggested below.

The requirements for the levels and locations of the adjacent public domain areas and public domain addresses were clearly articulated in the *Riverbank Site Controls*.

These levels were established by Parramatta City Council to ensure good public access between the river foreshore, the new square, Church Street and Lennox Bridge.

The colonnade edge was required to be at RL 6.4 and is to step up near Church Street to suit the existing footpath level (approximately RL 8.5). Between these two levels a series of terraces and steps were required that provided access to the foreshore walk. The projects proposed colonnade level varies between RL 7.8 and RL 8.9. And the 15 steps shown would only provide a change in height of less than 2.5m, (taking pedestrians to RL 6.6 instead of the RL 3.7 of the foreshore). This public domain edge also provides the interface to the proposed new public square. Currently no sensible connection to the foreshore is proposed between the two important public domain edges.

The proponent must prepare a public domain plan for this river foreshore area that meets the required finished floor level for the public domain edge and provide a well scaled and designed stepped edge to the river foreshore park. It is important that the public domain interface is resolved at a detailed scale and with well resolved levels prior to any approval being issued for the project by the Minister of Planning.

It would be an unfortunate outcome to approve the building with ground floor levels 1.5m higher than necessary. Not least because the raised height will necessitate minimum 21m additional ramp length for DDA compliant access as well as 10 additional steps to surmount the level change between the river foreshore and the active edge. It would also reduce the visual connection with the foreshore and passive surveillance of this primary public domain area in the Parramatta CBD.

The public domain plan(s) and alignment(s) plans are to be drawn over a proper measured survey showing all existing ground levels and generally to the Parramatta Public Domain Guidelines (including the City Centre Section, the Lanes Section and the River foreshore Section) and also to include the following:

- The levels in this plan are to ensure smooth and easy access between Church Street and the river foreshore as well as an accessible path of travel between the foreshore and Church Street.
- It is envisaged that the entire retail area addressing the river's edge will need to be lowered to 6.5 to meet the Riverbank site controls and to ensure better relationship to the river's edge and better passive surveillance.
- This plan should extend from the building to the edge of the existing concrete path near the river's edge. The vision for this part of the foreshore is urban and the majority of the land adjacent to the river is to be paved not turfed.
- A high quality wall to the eastern edge (next to the future Riverbank Square) is proposed.
- Logical and high quality access arrangements between the public walkway and the adjoining public domain; including a well designed stair/series of steps on the north western corner to replace the existing steel staircase and a well designed stair and DDA compliant ramps/steps system on the north east corner.
- Details of the lighting to the colonnaded area.

For the River foreshore Frontage

- Demonstrate how this design integrates with the proposed new portals in Lennox Bridge as claimed in the SEPP 65 Design Quality Principles Report.
- Public lighting to meet AS and replace the existing. New lights to be Optispan Aero Metal Halide 150watt to AS/NZS 1158.1 and meet P2 category.
- The pole is to be a slimline Parramatta pole 6.5m high with banner holders at approximately 20m spacings and also spaced to meet P2 category
- Pavement to the river foreshore is to be pebble crete PPX 1547 shot blasted finish and/or sandstone and/or insitu concrete to match existing path near artworks east of the ferry wharf and/or .
- The turfed areas are to be replaced with predominantly paved areas along the river front that will facilitate temporary stalls, Markets mobile vending units and the like.
- Terraced walls and steps are to be sandstone, insitu concrete and/or core ten steel.
- New tree planting is to be Eucalyptus punctata, Backhousia myrtifolia, Eucalyptus. tereticornis, Melaleuca linarifolia.

For the Shared Basement Vehicle Access/ Lane 11 Entrance.

- The driveway to the underground parking is currently located at the south western corner of the building this should be converted to retail and/or active use that is more appropriate to this highly prominent south eastern corner and the driveway incorporated into the shared basement access in Lane 11 off Phillip Street.
- It is noted that the grade separated solution described below will increase activation of the future public square, improve the street address from Phillip Street and improve safety for pedestrians in this potentially busy waterfront area.
- This 20 m wide lane is to be redesigned to become a highly presentable shared way that reduces pedestrian/vehicle conflict provides level footpath access along Phillip Street and must include;
 - Generous Pedestrian footpaths on both the east and western sides.
 - A drive providing shared access to the basement level; parking, garbage areas and supermarket loading dock as well as basement parking areas for future redevelopments on the Riverbank block.
 - An at grade access-way for taxis and small delivery vehicles leading to the Park Royal Hotel and Il Phoenician on the eastern side.

For the Church Street frontage

- This frontage has been upgraded about 5 years ago by Parramatta Council. Any damage caused by construction will need to be rectified as per the Parramatta Public Domain Guidelines. The plan should show all existing features to be retained and provide;
- Survey of existing levels e.g. top of kerb at Church Street and Footpath at Lennox Bridge that will assist in setting the appropriate levels for the active edge. The current levels of the retail uses along Church Street and the

riverfront seem overly high. E.g. the footpath is at RL7.8 and the supermarket is at RL8.9 and there are no steps shown to surmount the 1.1 m height difference. It is also noted that the footpath near Lenox Bridge seems quite steeply sloped and if this could be levelled to be just 2.5% it would ameliorate the level changes to the riverbank.

- Details of the pavement to the active edge and the small square adjoining Church Street.
- Lighting to meet the P2 category and Category V of AS/NZS 1158. This may require additional poles and lights. New poles to be Parramatta Pole.
- Clarification that the glazed awing along Church Street will provide sufficient shade and shelter, will not cause excessive heat or glare and the manner of regular cleaning to ensure high quality appearance at all times. If this cannot be demonstrated then an alternative design should be submitted.
- Describe how the awning will be lit at night time as the existing awning incorporates under awning lighting which will be demolished- this may be integrated with the street lighting described above.

Traffic & Parking Comments

A total of 597 parking spaces are to be provided in the basement levels with car and service vehicle access being provided by connection to Lane 11 from Phillip Street.

Parking Requirements

Council's City Centre LEP 2007 specifies the following parking rates:

- Residential component – "1 space per dwelling plus 1 space per 5 dwellings for visitors"
- Shops – "1 space per 30m²"
- Child Care Centre – "1 space per 4 child care places"
- Gymnasium - the RTA Guide to Traffic generating Developments specifies "3 spaces per 100m²"
- Library – commercial parking rate is used for this purpose - "1 space per 100m²"

Accordingly, the parking requirements for the proposed development are calculated as follows:

- Residential component – 468 spaces (this includes 78 spaces for visitors)
- Shops – 145 spaces
- Child Care Centre – 17 spaces
- Gymnasium – 2 spaces
- Library – 8 spaces

Total = 640 parking spaces (maximum)

There is a shortfall of 43 spaces

Traffic Generation

The Traffic Report submitted with the Project Application indicates that the traffic expected to be generated by the proposed development based on the RTA Guide to Traffic Generating Developments would equate to 176 vtpd in the morning and 309 vtpd in the afternoon. The Traffic Report states that *"this traffic generation will be very similar to that which occurred when David Jones was operating on the site and the decked carpark was heavily utilised. It is apparent that the proposed development is consistent with that envisaged in the planning for the precinct and that there will not be any unsatisfactory traffic implications"*.

The traffic that is expected to be generated by the proposed development is considered to be acceptable.

Parking Provision and Layout

The Traffic Report submitted with the Project Application states that *"A total of 597 parking spaces will be provided in the basement levels with car and service vehicle access being provided by connection to Lane 11 from Phillip Street. A total of 39 accessible spaces will be provided for residents and 4 designated and suitable spaces for disabled drivers, 24 bicycle and 5 motorbike spaces will be provided for visitor retail and child care centre while residents will be able to locate bicycles in their storage areas"*.

The parking layout in basement levels 1-4 is acceptable. The dimensions of the parking spaces and aisle width comply with AS 2890.1-2004.

The dimensions and configuration of the disabled parking spaces in basement levels 2 – 4, as shown on the plans do not comply with AS 2890.6-2009 and should be amended to comply with the Australian Standard. It is noted that dimensions and configuration of "adaptable spaces" should be the same as "disabled parking spaces" in accordance with AS 2890.6-2009.

It is understood that the parking spaces provided on basement level 1 will be used by the retail development. It is recommended that the stacked parking spaces (91-98, 124 -128 and 131-132) be marked for the shopkeepers/owners only.

The other stacked parking spaces provided on basement levels 2-4 are to be marked for residential spaces and each parking space should be used by the same tenants/owners only.

It is also recommended that the traffic movements on basement level parking areas should be marked on the pavement by directional arrows.

Access Arrangement

Access into and out of the site is provided via a combined access driveway from Lane 11 and Phillip Street.

The gradients along the access driveway and through to basement levels 1- 4 comply with AS 2890.1-2004.

Conclusion

Based on the analysis and information submitted by the applicant, the proposed development is not expected to have a significant traffic impact on Church Street and the surrounding road network. The proposal can be supported on traffic & parking grounds subject to the changes suggested.

Catchment Management Comments

Council's flood mapping shows that:

- There are floodplain cross sections located along the site's frontage to the river. The model results show a significant drop in river flood levels at Church Street in the 20 year, 100 year and PMF events and this is primarily a function of the relatively small waterway area of the Church Street bridge over the river (Lennox Bridge).
- There would be 20 year and 100 year flooding at a minor sag point in Church Street (including adjacent to No. 330) just south of Lennox Bridge.
- There would be 20 year and 100 year flooding in Phillip Street (which is the roadway which provides current vehicular access to and from the site).

The Council map also identifies that the property itself is not inundated in the 20 year and 100 year events. However it is unclear whether this presentation is reflecting the height of the current building rather than the susceptibility of the building itself to flood inundation.

In order to address the site's significant flood issues, it is recommended that the Part 3A flood submission should consist of a detailed flood impact assessment which includes the following:

- "Greenfields", "existing" and "post-development" conditions flood modelling of the 20 year, 100 year and PMF events associated with both Parramatta River and local catchment runoff being conveyed overland to the river. Furthermore, the "post-development" modelling to explicitly show no adverse impacts in the 20 year and 100 year events and no significant changes in the PMF flood regime relative to the "Greenfields" site assessment;
- Detailed assessment of the local flooding in Church Street and how this flooding will be addressed by the development;
- Examines in detail the flood risk issues associated with the project with a particular focus on inundation issues related to the proposed basement car parks together with details of how those risks will be addressed;
- The development of a detailed Flood Response Plan for the site (and it is noted that this should reflect the results of formal discussions with the SES).

Engineering

Stormwater Disposal

Since the site is located upstream of the Parramatta River weir in Charles Street, an on-site stormwater detention is required to be provided in the proposed development to avoid applying additional load then raise the 1:100 year flood level which may result in adverse impact on the downstream adjoining properties.

The following engineering issues are required to be considered by the applicant:

- An on-site detention system as part of a complete site stormwater system shall be designed and prepared by a practicing drainage engineer in accordance with Upper Parramatta River Catchment Trust On-site Stormwater Detention Handbook (Refer to the UPRCT website http://www.uprct.nsw.gov.au/osd/osd_download_centre.htm). The stormwater from the entire site has to be managed. Area of site drained to storage shall strictly comply with the requirements of the handbook.
- The stormwater design shall achieve a Site Storage Requirement of 470 m³/ha and a Permissible Site Discharge of 80 L/s/ha (as per 3rd edition of UPRCT's handbook) and when using the Extended/Flood detention method (4th edition of UPRCT's handbook), the Site Reference Discharge (Lower Storage), SRDL of 40 l/s/ha, Site Storage Requirement (Lower Storage) SSRL of 300 m³/ha and Site Reference Discharge (Upper Storage), SRDU of 150 l/s/ha, Site Storage Requirement (Total) SSRT of 455 m³/ha as per the submitted OSD calculation.
- The stormwater discharge from the site shall be drained by gravity to an approved existing stormwater system.
- A bio-retention system is required to be provided within the site area for the proposed development and prepared in accordance with clause 4.1.4 part 4 of Parramatta Development Control Plan (DCP).

Heritage

The development site is identified as a Heritage item of Local significance in the Parramatta City Centre Local Environmental Plan 2007, "Former David Jones department store"

The item is described by the NSW Heritage Branch as:

"Restrained three storey brick building with elegantly glazed windows to ground floor. Windowless walls above the street canopy are of stack-bonded mauve coloured glazed tiles. The facade makes a sweeping turn

at Lennox Bridge and the canopied footpath leads to an outdoor cafe overlooking the river. National Trust (Parramatta Branch).

Fabric: Brick with ceramic tiled walls and marble walls ground floor. Roof is corrugated iron. Roof Construction: Hip with curved parapet to riverbank . At street level from Church Street is columned arcade. Further storeys added within original building facade. Verandah Decoration: Archit Style: Inter War department store building with curved corner to Parramatta River. Awning: Curved metal awning. Constr Year: 1960s - refurbished 2001"

The proposed development will result in the loss of a heritage item. The department of Planning should take this into consideration when assessing the proposal.

It is recommended that, were the proposal to be approved, the significant heritage features of the item should be retained in their location where possible. Where this is not possible, the items should be used in a constructive manner in the fabric of the proposed development. Their usage should allow for their conservation and provide a historical marker for the history of the site to the public.

Conclusion

Parramatta City Council raises concerns with the proposed development. The following issues must be addressed in accordance with the abovementioned comments:

- Additional information is required to provide more detailed comments including the following:
 - The existing and changed ground levels should be noted comprehensively. Only some are noted and it's not clear whether they are new or existing;
 - The finishes and materials should be noted on the elevations. Currently they are not; there is only a general key;
 - The plans should include figured dimensions;
 - Solar Impact; and
 - Deep Soil provision;
- Penetrating paint should be used to paint any external concrete surfaces;
- The south-western corner that interfaces with adjoining buildings in Church Street and the applicant should demonstrate a good relationship with adjacent elevation.
- The applicant should demonstrate compliance with SEPP 65 particularly with regard to the:
 - Solar access to units;
 - Unit depth;
 - Provision of kitchens;

- Balcony size and provision
 - Provision of additional windows to apartment type A04
- Improved public interface/streetscape and provision of appropriate public domain plans
- The dimensions and configuration of “disabled parking spaces” and “adaptable spaces” must be in accordance with AS 2890.6-2009.
- The stacked parking spaces (91-98, 124 -128 and 131-132) are to be marked for the shopkeepers/owners only.
- The other stacked parking spaces provided on the basement levels 2-4 are to be marked for residential spaces and each parking space should be used by the same tenants/owners only.
- The traffic movements on basement level parking areas should be marked on the pavement by directional arrows.
- The Part 3A flood submission should consist of a detailed flood impact assessment which includes the abovementioned requirements under the heading “Catchment Management”. Any amendments to the proposed development should reflect the findings and recommendations of the assessment.
- Provision of suitable stormwater drainage in accordance with the abovementioned requirements under the heading “Catchment Management”
- The significant heritage features of the item should be retained in their location where possible. Where this is not possible, the items should be used in a constructive manner in the fabric of the proposed development. Their usage should allow for their conservation and provide a historical marker for the history of the site to the public.

Parramatta City Council would appreciate any further opportunity to review the amended development and provide additional comments and conditions.

In addition to the above issues being addressed, if the proposed development were to be recommended for approval, the conditions in Appendix A (but not limited to) should be included within any determination notice issued.

Parramatta City Council appreciates the opportunity that it has been given to comment on the project application and looks forward to further consultation on this matter.

Should you wish to discuss any of the above matters, please contact Council's Development Assessment Officer, David Little on 9806 5481.

Yours sincerely

A handwritten signature in black ink, appearing to read 'R. Lang', with a large, sweeping flourish underneath.

Dr. Robert Lang
Chief Executive Officer
Parramatta City Council

APPENDIX A

Dilapidation survey and report

1. Prior to the commencement of any excavation works on site, the applicant must submit for approval by the Principal Certifying Authority (with a copy forwarded to Council) a full dilapidation report on the visible and structural condition of all neighbouring structures within the 'zone of influence' of the required excavation face to twice the excavation depth.

The report should include a photographic survey of adjoining properties detailing their physical condition, both internally and externally, including such items as walls, ceilings, roof, structural members and other similar items. The report must be completed by a consulting structural/geotechnical engineer as determined necessary by that qualified professional based on the excavations for the proposal and the recommendations of the geotechnical report. Where the consulting geotechnical engineer is of the opinion that no dilapidation reports for adjoining structures are required, certification to this effect shall be provided for approval by the Principal Certifying Authority prior to any excavation. A copy of the dilapidation report shall be submitted to Council.

In the event that access for undertaking the dilapidation survey is denied by an adjoining owner, the applicant must demonstrate in writing to the satisfaction of the Principal Certifying Authority that all reasonable steps have been taken to obtain access and advise the affected property owner of the reason for the survey and that these steps have failed.

Note: This documentation is for record keeping purposes only, and may be used by an applicant or affected property owner to assist in any action required to resolve any dispute over damage to adjoining properties arising from works. It is in the applicant's and adjoining owner's interest for it to be as detailed as possible.

Reason: Management of records.

Damage to public infrastructure

2. Prior to commencement of works the applicant shall advise Council in writing, of any existing damage to Council property. A dilapidation survey of Council's assets, including photographs and written record, must be prepared and submitted to the Principal Certifying Authority and Council (if Council is not the PCA) prior to the commencement of works; failure to identify any damage to Council's assets will render the applicant liable for the costs associated with any necessary repairs.

Reason: To protect Council's assets throughout the development process.

Cost of adjustment to public utilities

3. The arrangements and costs associated with any adjustment to a public utility service shall be borne by the applicant/developer. Any adjustment, deletion and/or creation of public utility easements associated with the approved works are the responsibility of the applicant/developer. The submission of documentary evidence to the Principal Certifying Authority which confirms that

satisfactory arrangements have been put in place regarding any adjustment to such services is required, prior to the release of the Construction Certificate.

Reason: To minimise costs to Council.

Damage to public infrastructure

4. Any damage to Council assets that impact on public safety during construction is to be rectified immediately to the satisfaction of Council at the cost of the developer.

Reason: To protect public safety.

Post-construction dilapidation report

5. The applicant shall engage a suitably qualified person to prepare a post construction dilapidation report at the completion of the construction works. This report is to ascertain whether the construction works created any structural damage to adjoining buildings, infrastructure and roads. The report is to be submitted to the PCA. In ascertaining whether adverse structural damage has occurred to adjoining buildings, infrastructure and roads, the PCA must:

- (a) compare the post-construction dilapidation report with the pre-construction dilapidation report, and
- (b) have written confirmation from the relevant authority that there is no adverse structural damage to their infrastructure and roads.

A copy of this report is to be forwarded to Council.

Any damage identified by the Post-construction dilapidation report shall be rectified to the satisfaction of Council at the cost of the developer prior to the issuing of the Occupation Certificate.

Reason: To establish the condition of adjoining properties prior building work and any damage as a result of the building works.

EB20 Construction and Traffic Management Plan

6. Prior to the commencement of any works on the site the applicant must submit, a Construction and/or Traffic Management Plan to the satisfaction of the Principle Certifying Authority. The following matters must be specifically addressed in the Plan:

- (a) Construction Management Plan for the Site
 - A plan view of the entire site and frontage roadways indicating:
 - i. Dedicated construction site entrances and exits, controlled by a certified traffic controller, to safely manage pedestrians and construction related vehicles in the frontage roadways,
 - ii. Turning areas within the site for construction and spoil removal vehicles, allowing a forward egress for all construction vehicles on the site,
 - iii. The locations of proposed Work Zones in the egress frontage roadways,
 - iv. Location of any proposed crane standing areas,

- v. A dedicated unloading and loading point within the site for all construction vehicles, plant and deliveries,
- vi. Material, plant and spoil bin storage areas within the site, where all materials are to be dropped off and collected,
- vii. The provisions of an on-site parking area for employees, tradesperson and construction vehicles as far as possible.

(b) Traffic Control Plan(s) for the site:

- i. All traffic control devices installed in the road reserve shall be in accordance with the Roads and Traffic Authority, NSW (RTA) publication '*Traffic Control Worksite Manual*' and be designed by a person licensed to do so (minimum RTA 'red card' qualification). The main stages of the development requiring specific construction management measures are to be identified and specific traffic control measures identified for each,
- ii. Approval shall be obtained from Parramatta City Council for any temporary road closures or crane use from public property.
- iii. A detailed description and route map of the proposed route for vehicles involved in spoil removal, material delivery and machine floatage must be provided and a copy of this route is to be made available to all contractors.
- iv. Where applicable, the plan must address the following:
 - 1. Evidence of RTA concurrence where construction access is provided directly or within 20 m of an Arterial Road,
 - 2. A schedule of site inductions shall be held on regular occasions and as determined necessary to ensure all new employees are aware of the construction management obligations.
 - 3. Minimising construction related traffic movements during school peak periods,

The Construction and Traffic Management Plan shall be prepared by a suitably qualified and experienced traffic consultant and be certified by this person as being in accordance with the requirements of the abovementioned documents and the requirements of this condition.

Reason: To ensure that appropriate measures have been considered during all phases of the construction process in a manner that maintains the environmental amenity and ensures the ongoing safety and protection of people.

Public Domain Deposit

- 7. A Public Domain Works Deposit and a Footpath Damage Deposit are to be paid to Council prior to the issue of the first Construction Certificate. The Deposits are required to ensure the protection of the Church Street Frontage and the Phillips Street Frontage. The Deposits are calculated as follows:

Public Domain works deposit:

- \$630 per sqm of surfaced footpath when works are proposed to extend to public domain

Footpath Damage Deposit

- \$1,000 per lineal metre of public domain frontage

Council's City Assets & Environment Team must be given an opportunity to inspect the public domain prior to the commencement of works and following completion of works. Subject to the satisfaction of Council, after the final inspection, the deposit, minus the costs of any damage observed to the relevant public domain and footpath, is to be returned.

Reason: To ensure protection of the public domain.

Environmental Management Plan

8. An Environmental Management Plan shall be drafted and approved by Parramatta City Council prior to the commencement of any demolition, excavation or construction works upon the site. The Plan should establish a commitment to the protection of the environment and the prevention of pollution. The Plan shall include all necessary methods to be used to protect Parramatta River and the associated foreshore. The Plan should include relevant details and methods of protection such as the following:

- Key Issues;
- Interface with other Environmental Documents;
- General Site Information;
- Site Amenities;
- Traffic Management Works Area;
- Design Parameters for the Size and Location of the Construction Site;
- Relevant Environmental Programs such as an Erosion and Sediment Management Program;
- Construction methods;
- Access to Construction Site;
- Temporary Works to Enable Permanent Construction;
- Construction of Permanent Structures;
- Cleanup and Reinstatement;
- Risk Assessment & Decision Analysis;
- Performance Measures; and
- Work Activity Packs.

Any devices proposed as part of the Plan are to be maintained appropriately. For example the erosion and sediment control practices are to be maintained throughout the entire demolition, excavation and construction phases of the development and for a minimum three (3) month period after the completion of the project, where necessary.

Reason: To ensure protection of the environment, particularly the Parramatta River and the associated foreshore, and the prevention of pollution.

PD08 Hours of work and noise

9. All work including building, demolition and excavation work; and activities in the vicinity of the site generating noise associated with preparation for the commencement of work (eg. loading and unloading of goods, transferring tools etc) in connection with the proposed development must only be carried out between the hours of 7.00am and 5.00pm on Monday to Fridays inclusive, and 8.00am to 5.00pm on Saturday. No work is to be carried out on Sunday or public holidays.

Note – Council may allow extended work hours for properties located on land affected by Parramatta City Centre LEP 2007 in limited circumstances and upon written application and approval being given by Parramatta City Council at least 30 days in advance.

Such circumstances where extended hours may be permitted include:

- Delivery of cranes required to the site outside of normal business hours;
- Site is not located in close proximity to residential use or sensitive land uses;
- Internal fit out work.

Reason: To protect the amenity of the area.

Section 94A Contribution – City Centre

10. A monetary contribution comprising of **3% of the value of the proposed works** is payable to Parramatta City Council pursuant to Section 94A of the *Environmental Planning and Assessment Act, 1979* and the *Parramatta City Centre Civic Improvement Plan*. Payment must be by cash, EFTPOS, bank cheque or credit card only. The contribution is to be paid to Council prior to the issue of a **construction certificate**. At the time of payment, the contribution levy will be indexed quarterly in accordance with movements in the Consumer Price Index (All Groups Index) for Sydney issued by the Australian Statistician.