CITY OF PARRAMATTA

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

Your Ref	SSD-64916225
Our Ref	NCA/19/2023
Contact	Paul Sartor
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20/09/2024

ATTN: Ingrid Zhu

COUNCIL SUBMISSION
NOTICE OF EXHIBITION OF ENVIRONMENTAL IMPACT STATEMENT FOR THE WSU INDIGENOUS CENTRE OF EXCELLENCE (171 VICTORIA RD, PARRAMATTA)

I refer to the above application and the request to provide advice on the proponent's Environmental Impact Statement. Council remains committed to centring First nations aspirations and voices within the City and is supportive of the proposal. The following comments relate to matters of detail that warrant further consideration.

Flooding, Stormwater and Water Sensitive Design

The site is impacted by flooding from both overland flows and Vineyard Creek as per Council's newly adopted Parramatta River Flood Study 2024 (PRFS).

Following a meeting with Council's Catchment Engineers and the applicant, the following recommended civil design changes are reiterated:

- Suspended slabs are not supported for overland flow flood mitigation.
- Building over the existing Council Stormwater pipe is not supported as this does not allow access for maintenance in the future. This pipe must be relocated by the applicant with a set of civil and design drawings of the relocated pipe submitted as part of this application. It should be shown on architectural and landscape plans to ensure that there is no future conflict.
- Unobstructed overland flow paths must be provided for the 1% AEP flow event.

Council recommends that a further meeting is held with us to discuss these requirements prior to the submission any Response to Submissions report.

Given the above, a detailed overland flow and riverine flooding impact assessment which makes reference to the PRFS is required. This study should consider the detailed requirements in attachment 1 of this letter.

Landscaping
The provided landscape plan and ecological plan have been reviewed and the following changes are suggested to be explored:

- It is recommended that the footpath along the Fifth St verge is retained to enable retention of the Fig trees along the southern boundary, where possible.
- Recommend an increased setback is provided to the significant tree 40 *Melaleuca linariifolia* (Snow-in-Summer) as the level of encroachment into the TPZ and canopy may be detrimental to the long-term survival of this tree.
- The ground levels to the base of tree 40 should be retained with minor fill added to marry in with the soil depth at the base of the trunk. No soil build-up to the trunk or excavation should occur within the root zone.
- It is recommended replacement trees be:
    a. provided in a minimum 100 litre container,
    b. able to reach a minimum mature height of 13 metres,
    c. be planted at minimum distances of 2 metres from any drainage line,
    d. be planted a minimum 3.5m to the outside enclosing wall or edge of a legally constructed building, structure or proposed development.
- Ensure the proposed plant species are appropriately located based on the solar access (sun/shade).
- Some of the planting mixes contain trees which may cause a conflict with the building clearances or each other. These species should be reconsidered.
- A plant schedule indicating suitable trees, shrubs, groundcovers - including the botanical and common names -, plant quantities, size of the containers at planting, and mature height and canopy spread is recommended.
- Consideration should be given to establishment of a vegetated riparian corridor along the western side of Vineyard Creek that adjoins the 'project site'. This would contribute to a positive overall landscape design and would improve the local wildlife/vegetation corridor along the creek. This would also contribute to offset the 12 mature Ficus hillii that are proposed to be removed

Traffic and Transport

Given the apparent spare capacity within the current car park, and the fact that the peak times of the Indigenous Centre of Excellence do not generally align with the peak times for the rest of the campus, it is believed that the existing number of parking spaces will be suitable to cater for the proposal subject to the following measures/conditions being included with any approval.

The Traffic Impact Assessment states that there is a separate proposal to reinstate all parking that will be lost as part of the proposed development. This report states that the reinstatement will be prior to commencement of construction of the proposed development. A condition should be imposed on any consent to ensure this occurs. It is noted that should the parking not be reinstated, staff and students may overflow onto nearby on-street locations and therefore affect the amenity of the area.

Further to this, it is noted that there is an existing approved DA (DA/346/2022) that will provide footpath access from the active transport link to the proposed building. Given that the proposal will increase the GFA within the campus, and thereby staff and student capacity, measures to promote sustainable transport options are considered important in order to reduce private vehicle use. As such, a condition should be included that would require the construction of the pedestrian link prior to issue of an Occupation Certificate for this application.

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

Urban Design
The proposed design has shown a great effort to achieve different aspects of Connecting with Country for the Indigenous Centre of Excellence. Council is supportive of the overall design of the building, however, would like to provide the following comments for consideration:

- The proposed form essentially turns it back to Victoria Road, with little activation to this primary façade. Acknowledging the noise constraints of such a busy road, it is still considered valuable for the proposal to address this frontage and respond to the street. Consideration for additional pedestrian entries from Victoria Road to the internal space or a secondary entrance may assist opening this distinctive building to this frontage.
- Further, the façade to Victoria Road has little articulation or modulation, despite a building length of approximately 100m along this frontage, which exacerbates the bulk of the building. While only four storeys at its highest, the largely blank façade creates the impression of a much larger scale, especially to pedestrians at ground level.
- The proposed signage zone is of a significant size, taking up a considerable amount of the length of the Victoria Road façade and all the height of the proposed building. It is unclear in the documentation provided the size or type of signage being proposed, but there is the potential for this signage to eclipse the built form given the scale of the signage zone, which may not be sympathetic to the building form or the surrounding context. It is recommended the signage zone be reduced in size.

Conclusion

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

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

Should you wish to discuss the above matters, please contact Paul Sartor (Senior Development Assessment Officer) on the details listed above.

Yours sincerely

Myfanwy McNally
MANAGER, CITY SIGNIFICANT DEVELOPMENT

Attachment 1 – Flood Modelling Requirements
Attachment 2 – Traffic and Transport Recommended conditions

Attachment 1 – Flood Modelling Requirements

Overland Flooding and Riverine Flooding

i. As the subject site is highly impacted by flooding, overland flow paths need to be identified and quantified to ensure appropriate flooding and overland flow path management. Overland flow paths should be safe and adequate up to 1% AEP (with climate change and rainfall calibration), however adequacy for conveyance should be available for higher storm events up to PMF.
ii. A detailed 1D-2D TUFLOW model needs to be developed for the site area for both pre-development condition and post development condition to demonstrate that there will be no impact due to the proposed development and flooding & overland flow paths are safely managed. Council can provide a copy of its flood model for this location to assist the applicant's consultant set up of their pre-developed hydraulic model for this location. A formal request will need to be submitted to Council and a processing fee for this information will be charged in accordance with Council's Fees and Charges.
iii. Currently, the subject site is also functioning as flood storage. Loss of existing flood storage needs to be incorporated in the design.
iv. Climate change scenario with sea level rise should be included in accordance with the latest industry guidelines, especially Australian Rainfall & Runoff.
v. As part of Parramatta River Flood Study, it was identified that ARR2024 rainfall and methodology is providing lower flowrates than experienced and calibration of the model to match with the Flood Frequency Analysis was required. A separate advice will be provided in relation to the calibration methodology. This should be included while undertaking flood impact assessments.
vi. Afflux Maps (Post-Development Scenario minus Pre-Development Scenarios) need to be prepared, and no impact should be demonstrated considering 1%, 5%, 10% & 20% and PMF storm events.
vii. Hazard Maps as per ARR2019 should be included.
viii. Velocity Maps should be included.
ix. Sensitivity Analysis
    a. Blockage 100%, 50% & design blockage for stormwater pipes
    b. Climate Change (ARR2024)
    c. Downstream Boundary Condition
    d. Loss Parameters
    e. Others parameter as required.
x. An electronic copy of TUFLOW Model with all relevant files with a brief report outlining model inputs, boundary conditions, assumptions, impact analysis, pre-development and post-development comparison flows & levels at relevant locations, overland flow paths and flood storage changes, results, and recommendations must be provided.

Civil Drawings

- The proposed swale leading to the wetland pond may have to be revised based on above comments.
- Investigate and incorporate design to alleviate flooding issues at Victoria Road adjacent to the subject site and drainage adequate to the current standard as mentioned in item 2 below.
- Climate change for 2070 has been adopted however climate change in reference to the design/service life of the development should be adopted. Guidance on design/service life is available in ARR2024.

Stormwater Systems

The existing council pipe and any modification/relocation will remain under Council's ownership. All other stormwater drainage associated with the building will be part of the private stormwater drainage system.

For the stormwater systems which will become Council's asset upon dedication, the following must be considered/provided:

i. A set of design drawings for existing or proposed stormwater system to be handed over to the council. A separate set of full civil drawings should also be included for reference.
ii. The relocation of Council's existing pipe will require the new pipe to be designed to comply with the following requirements:
    a. 5% AEP with 50% blockage in sag pits and 20% blockage in on-grade pits and
    b. safe overland flow in 1% AEP (with climate change and rainfall calibration).
iii. An electronic copy of DRAINS model needs to be submitted along with the electronic copy of the sub-catchment plan and brief report to demonstrate adequacy and appropriateness of the drainage infrastructures.
iv. Appropriate tail water conditions should be incorporated in the model.
v. Stormwater Drainage Plan and Longitudinal Section
    a. Stormwater Drainage Plan and longitudinal sections shall also include horizontal and vertical position of all existing and proposed service utilities.
    b. All Longitudinal drainage sections shall include the Hydraulic Grade Line for 5% AEP and 1% AEP (with Climate Change).
    c. All pipes need to be designed for heavy vehicular loading with consideration during construction and post-construction loading. Pipe class shall be no less than Class 3. All Pipes to be Reinforced Concrete Spigot and Socket Rubber Ring joint type. This information shall also be included in the longitudinal sections.
vi. All stormwater drainage design details are to be in accordance with council standard drawings. All Pits shall be designed and constructed in accordance with council standard drawings. The design drawings shall include, but not limited to the following details;
    a. A detailed Pit Schedule with Pit ID, type and size of the pit, type and size of the pit cover, lintel size, reference to the drawing (such as council standard drawing number, custom pit etc)
    b. Any custom designed pits and council standard pits with depth greater than 2.5m shall include structural details and structural certifications referring drawing sheet details from registered structural engineer.
    c. All pit cover/ grate should be class D heavy duty, galvanised, bike safe and bolted down type.
vii. Stormwater Drainage Design should consider proposed WSUD elements.

Water Sensitive Urban Design (WSUD)

The following is to be submitted to ensure that the proposed WSUD meets the requirements of section

i. An overall water quality management plan needs to be submitted to council for review.
ii. Electronic copy of MUSIC Model with the relevant background should be submitted to council for review. Rainfall Station should be PARRAMATTA NORTH MASONS DR (66124) 6 minutes data from 1988 to 1998 (10 years). It is also available in MUSIC-Link for MUSIC_X.
iii. Except GPTs to the outlet, use of proprietary products as public WSUD elements are not recommended.
iv. All WSUD and GPT devices are to be located to allow for safe access to maintain structures to meet with WHS requirements.
v. A brief report outlining background, modelling inputs and references, assumption, treatment approach, results, conclusion, and recommendations along with the electronic copy of the sub-catchment plans for WSUD elements should be included.

Flood Planning Level

The recently adopted PRFS 2024, advises flood planning area and flood planning level. Flood Planning Level adopted is **1% AEP + 2150 Climate Change with RCP 8.5 + Rainfall Calibration + 0.5m Free Board**.

Any changes in adopted flood planning level will not be supported. A formal flood enquiry application needs to be submitted to Council to receive flood information. A separate request needs to be submitted for electronic copy of model set-up files. Note that there will be charges for flood enquiry application and for model set-up files.

Impacts on Council's existing infrastructures including stormwater systems.

Details on impacts on council's existing infrastructures including stormwater systems and required relocation/upgrades need to be included in the report in a separate section of the report.

Flood Emergency Management Plan

Provide an adequate Flood Emergency Management Plan that is consistent with SES Flood Emergency Plan and with local emergency plans.

Maintenance Plan

A clear maintenance plan needs to be included in design report to cover cleaning and maintenance of the stormwater and WSUD assets to be handed over to the council.

Public and Private Assets (Existing and Proposed)

A map clearly showing proposed and existing public and private stormwater/flooding assets needs to be included. It should also show the owner (current/future) of the assets.

Flooding, Rainwater and Water Sensitive Design

Council will not accept underfloor flow paths and buildings must be solid to the ground.
Flow paths may contain Water Sensitive Design features, provided they are adequately designed for both low and high flow functions.

The purpose of existing detention ponds on the site is to be reviewed and modelled and their benefit for flood mitigation recreated in the new proposal, or, if it is determined that these facilities do not benefit flooding, they may be replaced with other water sensitive design measures.

Roof gardens are supported and encouraged as part of the development's integrated water management system.

Council supports using water in the landscape to recreate ecologically valuable and relevant spaces and to manage rain and surface water.

The net discharge of rainwater/stormwater from the site must be 10% less than that from the site in an undeveloped state (note this is not the predeveloped or existing state). This is for total discharge over time, not from temporary / peak discharges such as from an OSD system. This requirement is likely to require significant rainwater capture and use on the site.

Discharged water quality must be as required in Council's DCP 2023 or better.

Generally, the site water management system must be designed, built and operated in accordance with Parramatta DCP 2023 and also Council's 'Guidelines for Water Sensitive Design and the Blue Green City' which can be provided on request.

Attachment 2 – Traffic and Transport Recommended conditions

Before the Issue of a Construction Certificate

Prior to issue of the relevant Construction Certificate, the P1 Replacement Car Park is to be operational and provide a minimum of 284 parking spaces as detailed in the Traffic Impact Assessment by Taylor Thomson and Whitting dated 26 July 2024.
Reason: To comply with Council's parking requirements and to protect the amenity of the surrounding residential and business areas.

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

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

While Building Work is being carried out

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

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

Prior to Occupation

Prior to the issue of the relevant occupation certificate, the pedestrian link as required by DA/346/2022 is to be completed and made operational.
Reason: To promote sustainable transport practices.