CITY OF PARRAMATTA

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

Your Ref	SSD-80904224
Our Ref	NCA/7/2025
Contact	Douglas Bennett
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10/07/2025

ATTN: Justin Keen,

COUNCIL SUBMISSION TO REQUEST FOR ADVICE ON EIS – RESIDENTIAL FLAT BUILDING WITH IN-FILL AFFORDABLE HOUSING AT 93 BRIDGE ROAD, WESTMEAD

I refer to the above request to provide advice on the Environmental Impact Statement (and accompanying information) for SSD-80904224 (Residential Flat Building with In-Fill Affordable Housing) at 93 Bridge Road, Westmead.

Council officers raise significant concern with the concurrent Rezoning Review and SSDA processes. The Rezoning Review is not sufficiently progressed to allow an informed assessment of the subject SSDA. Indeed, the notification period for the Rezoning Review closes after the SSDA notification. Any public benefits / infrastructure that may be agreed as part of the Rezoning Review, and how they may be appropriately integrated in the subject development, cannot be fully considered.

This letter should be read in conjunction with Council's response to the associated Rezoning Review process. It is expected that any public benefits / infrastructure secured as part of that process are integrated into the subject SSD proposal prior to determination. Council consider further notification of the application may also be appropriate at that time. Council offers remain available to discuss the matter with the applicant and the Department at any point in the assessment process.

Council has reviewed the application and accompanying documentation and formally **OBJECTS** to the proposed development in its current form. Key issues identified in this letter are summarised below:

- The proposed public park lacks accessibility (both for the public, and Council in a servicing capacity), permeability, and clear public edges, undermining its function and safety. Any public park required as part of the Rezoning Review Process must have direct access to a public road. If that is not feasible, there may be other community benefits that could be provided to justify the base FSR uplift, such as affordable housing units dedicated to Council. It is imperative that an open dialogue is established with Council to discuss the best way to deliver community benefits on the site.
- Site access and urban design do not support future connectivity or public domain objectives. In particular, the development would not provide appropriate building access/address, or pedestrian and cycling connections, to existing roads or a potential future road to the north.
- Dwelling mix is heavily skewed toward small units and does not align with local demographic needs. A greater proportion of 3+ bedroom units must be provided.

Other issues include the following:

- The proposal fails to provide appropriately integrated and accessible communal open space.
- Traffic modelling does not reflect recent Council-endorsed projects that will change traffic conditions and lacks coordination with Cumberland City Council.
- Basement and universal access designs fall short of compliance and best practice standards.
- Stormwater infrastructure adequacy and groundwater management remain unresolved.

Principal recommendations made by Council in this submission include the following:

- Further consideration of integrating any required infrastructure (i.e. public park with appropriate public access, dedicated affordable housing units) which arises out of the Rezoning Review process.
- Decrease in podium front setback (Bridge Road) from 10.5m to 6m.
- Deletion of vehicular access from Bridge Road and provision of new access from the private road to the south.
- Revise dwelling mix to include additional 3+bedroom units (at least 15% of overall dwelling mix).
- Improve Bridge Road frontage with increased greening, clear entry points, and a shared pathway between cyclists and pedestrians. Improve southern and northern frontages to provide sense of address and access to existing private road (south) and potential future public road (north).
- Relocate visitor bicycle parking near building entrance.
- Adjust basement design to avoid protrusion above ground and ensure alignment with podium setbacks.

Detailed comments are provided at Appendix 1.

Council appreciates the opportunity to comment on the above application, are supportive of the continued investment in housing & affordable housing within the City of Parramatta and look forward to continued collaboration. It is noted that this is the objection/advice of Council officers, and this submission has not been endorsed at a Council meeting.

Should you wish to discuss the above matters, please contact Douglas Bennett, Senior Development Assessment Officer on the details listed above.

Yours sincerely

Alex McDougall
Team Leader
City Significant Development Team
Development and Traffic Services Unit

Appendix 1 – Detailed Comments

Parks and Open Space

Proposed Public Park

Council's Community Infrastructure Strategy (CIS) prescribes the provision of high quality public open space / children's play within 250m of high-density dwellings. There is a current gap in provision, as required to service the future population within the development, with the nearest public open space is located approximately 400m at Shannons Paddock. The subject site therefore provides a potential opportunity to secure additional high quality public open space to address the current provision gaps.

To satisfactorily address the additional recreational demand facilitated by the future population, new open space will need to be high quality and maximise accessibility and permeability to the surrounding community in the context of current provision gaps, particularly children's play. Any 'public' open space to be dedicated to Council is required to demonstrate consistency with the fit-for-purpose criteria within Councils CIS to maximise recreational capacity and accessibility by both immediate residents and the surrounding community (see below).

The proposed 'public' open space fails to satisfactorily address both the CIS criteria and SEARs requirements. It lacks public edges (private road frontage only) and has a poorly defined interface with the adjoining built form resulting in a 'private' feel with limited accessibility / permeability to the wider community. In addition, the proposed park lacks appropriate children's play facilities and gym equipment of which there is a shortage in the broader precinct.

Concern is also raised as to the safety of the park due to entrapment points. The owners of the private road could fence off access to the park and/or private street, leaving the long narrow pedestrian accessway as the only way in and out of the park. Further, the private road may not be accessible by emergency services to attend to any injured members of the public in the park, or by Council maintenance vehicles seeking to service the park.

Council would not support dedication of the proposed 'public open space' to Council if it is to be retained in the current configuration due poor delineation between public / private domains, lack of reasonable public access, safety concerns and suboptimal recreational opportunities. Any public park on the site must have an appropriate frontage to a public road.

Urban Design

Council notes that submitted plans and documents are missing key details, including dimensions for building envelopes, height measurements (particularly from ground level to floor or plinth), and yield tables.

The following urban design comments & recommendations are made in response to the various elements of the proposed development.

Site Vehicular Access

Council does not support the proposed vehicular access configuration from Bridge Road for the following reasons:

- It necessitates excavation greater than 2m and requires a new retaining wall structure on the northern site boundary in the landscape setback.

- There is no opportunity for connectivity to future roads in the large potential redevelopment site to the north such as the key east-west cross block connectivity investigated in previous strategies (Transport Strategy 2022) and as recommended in strategic planning advice over recent years.
- The proposal does not provide a clear public street address for Tower B or to the public park which is located at the rear of two new residential towers.
- The proposed 3m northern east-west pedestrian link, located above a retaining wall and contained by 2 x 1.8m fences, has low amenity and poor CPTED characteristics. The link is unlikely to service a future cycle link (minimum 3.5-5m path required), provide suitable universal access (minimum 1.8m path required) as well as generous space for shade tree planting as suggested in the applicant's Design Report (ref Clause 2.15).

Council recommends that the proposal be redesigned to facilitate primary vehicular access to the site from the private road to the south. This is the preferred site access arrangement, subject to negotiation with the adjacent landowner about ongoing easement rights over the existing southern private road.

Access from the northwestern corner of the site should only be considered if the above option cannot be achieved and only if the following outcomes are confirmed:

- The driveway access is integrated into the built form, rather than located externally in the landscape setback.
- The driveway is separated sufficiently from the northern boundary to not interfere with any future east-west road along the southern side of the adjoining site to the north.

Bridge Road Setback

It is acknowledged that a 10.5m landscaped setback has been provided in line with advice from the Sydney Central City Planning Panel. However, Council would support a reduction in this front setback to 6m in order to accommodate a more generous & centralised communal open space between the two towers.

In addition to the above, a clearly defined entry point to the site to assist with wayfinding to the tower lobby should also be investigated. Additional detail should be provided to demonstrate how level changes between the ground floor FFL and street level will be managed without the need for excessive stair and ramp access within the front setback. An activated edge with improved natural surveillance should be investigated.

The hardscape landscape treatment proposed in the Bridge Road frontage responds poorly the ground floor residential use. Council recommends significant greening along this frontage, comprising tree and screen planting to address privacy for residents as well as generous deep soil zones to appropriately offset urban heat.

Direct street access to ground floor units should also be investigated.

Street Address (Tower 'B')

Council notes that the design of the proposal includes a shared 'super' lobby located within Tower A to serve both towers. The outcome of this design is the absence of a legible street address for tower 'B'. This is inconsistent with best practice and does not allow all buildings to contribute to local street character. This is considered essential to support the future amenity, convenience and access for future high density residential living. Tower B should have lobby access and address to both its northern elevation (in the event a road to the north eventuates) and to the southern private road. The applicant could explore reducing the northern podium

setbacks, to a level commendation with the recommended Bridge Road setback, to assist in achieving the above objectives.

Basements

The relationship between proposed basement levels and ground level interface on all elevations of both buildings needs clarification. Current drawings indicate that basement structures protrude above ground level, which is not supported. Council recommends that the design of basement levels be revised (including the protruding basement car park frontage at the base of tower 'B') to ensure that basement levels do not protrude excessively above finished ground. Revised designs should include indicative basement levels, relevant dimensions, and complete building elevations for all frontages.

In addition to the above, confirmation should be provided that the basement car park setbacks align with podium setbacks.

Built Form (Podium, Towers, Tower Separation and Upper-Level Setbacks)

Tower A is considered to be excessive in bulk and scale with a floorplate of approximately 1,150sqm gross building area, and 60m in width.

Council supports the tower to podium setbacks recommended by the Planning Panel in the Design Guidelines. These included a 4m setback on the northern and southern elevations for both towers. The applicant's proposed reductions, to 2m on the north and 0m on the south, are not supported. The reduced setbacks compromise the clarity of the podium/tower typology and present instead large towers landing on the ground. In addition, an appropriately articulated podium and tower form will improve wind conditions and pedestrian amenity at ground level.

Public Domain Alignment

Council recommends that the applicant prepare a set of Public Domain alignment drawings detailing proposed public domain upgrades within the road reservation to support higher intensity use. The plans should be prepared prior to issue of any construction certificate for the site.

Social Impact

Dwelling Mix

Council notes that the proposed dwelling mix does not align with dwelling mix requirements outlined in the *Parramatta Development Control Plan 2023* (see table below). The proposal does not provide a diverse range of unit sizes, as 96.4% of dwellings are small unit sizes of one and two bedrooms).

Dwelling type	Number of units proposed	Percentage of units proposed	PDCP dwelling mix requirements	Does it comply?
1 bedroom	304 units	55.4%	10-20%	No
2-bedroom	225 units	41%	65-75%	No
3-bedroom	20 units	3.6%	10-20%	No

The NSW Apartment Design Guide requires that a dwelling mix be provided based, in part, on demographic trends (Objective 4K-1). Council acknowledges that the provisions of the *Parramatta Development Control Plan 2023* do not apply to state significant development applications (by virtue of s. 2.10 of the *State Environmental Planning Policy (Planning Systems) 2021*). However, the dwelling mix requirements contained within the *Parramatta*

Development Control Plan 2023 have been prepared based on demographic trends within the broader local government area and are broadly in keeping with the findings of the *Parramatta Local Housing Strategy*. As such, Council is of the opinion that applying the dwelling mix requirements to the proposed development would be in the public interest (s. 4.15(1)(e) of the *Environmental Planning & Assessment Act 1979*).

Assumptions around the residential needs of the community outlined in the application's Environmental Impact Statement includes the following:

> "*According to the Parramatta Council Local Housing Strategy 2020, the Parramatta LGA has an excess of dwellings comprising 3 or more bedrooms, with only 7% of 1-bedroom dwellings in the LGA… the proposed development has sought to remedy this gap by delivering 304 1-bedroom dwellings."*

The City of Parramatta Local Housing Strategy 2020 was informed by 2016 ABS Census data and identified an undersupply of one-bedroom dwellings. However, since the LHS was endorsed, 2021 ABS Census data has shown that the dominant dwelling type in City of Parramatta has shifted from dwelling houses to high density residential development, resulting in a shift towards smaller dwelling sizes (see figure below).

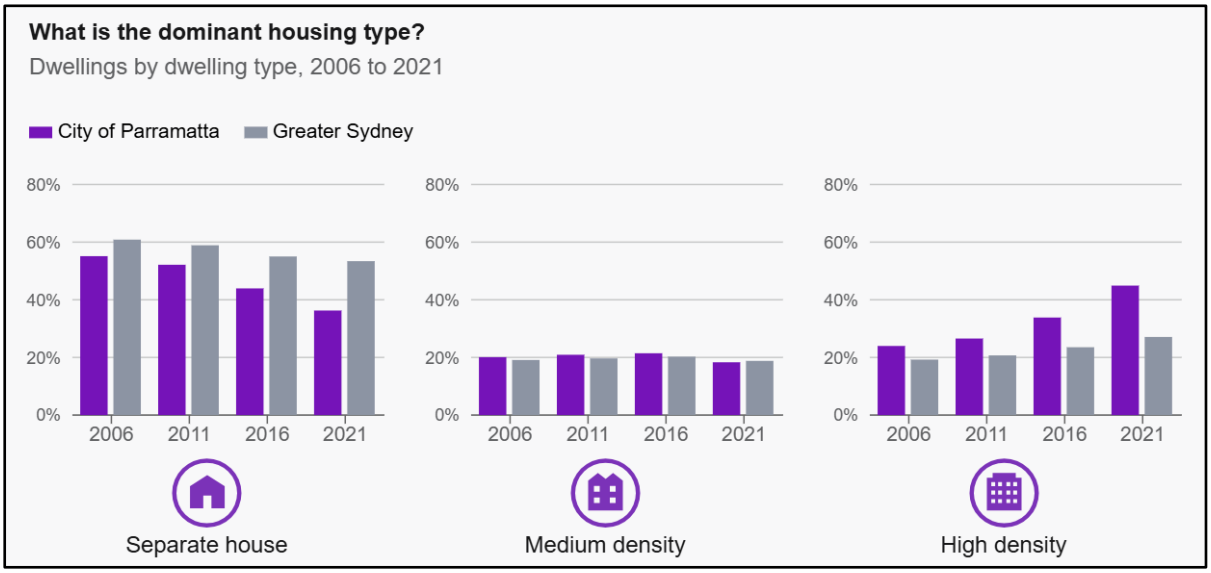

Figure 1 *Dwellings by dwelling type in City of Parramatta from 2006 to 2021 (source: profile.id)*

Whilst two and three-bedroom dwellings are the dominant dwelling size in City of Parramatta, the proportion of three and four-bedroom is declining (see figure below). A gap is emerging in the availability of three-bedroom dwellings. Between 2011 and 2021, three-bedroom dwellings declined from 36.5% to 26.8% of all dwellings, whilst one-bedroom dwellings increased from 5.3% to 10.3%, reflecting significant growth in smaller dwelling sizes, consistent with the shift towards high density.

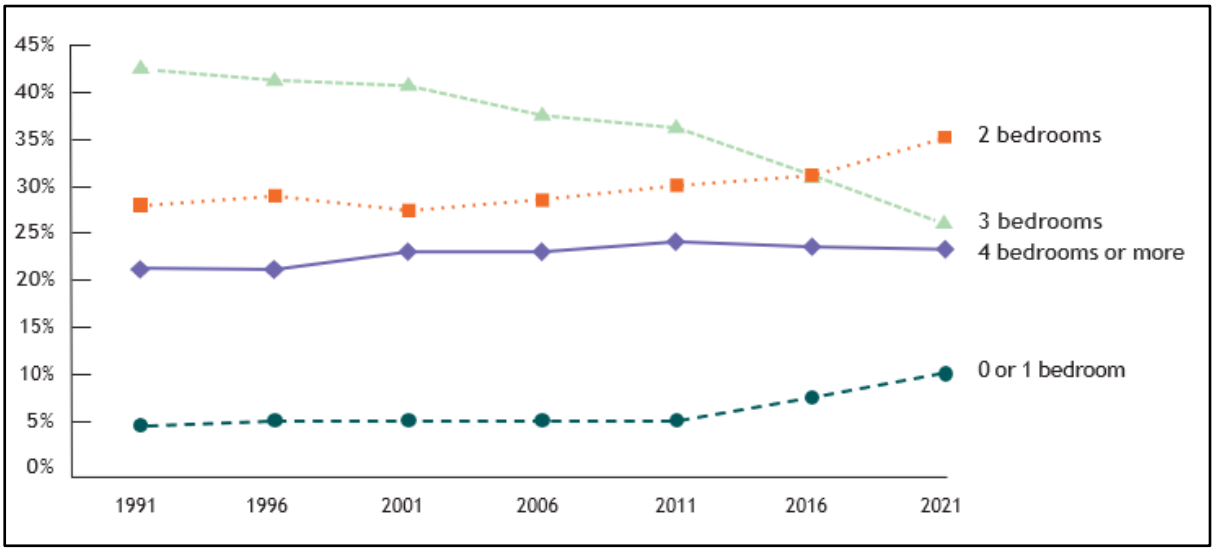

Figure 2 Proportion of bedrooms per dwelling in City of Parramatta from 1991 to 2021 (source: profile.id)

The decline in three-bedroom housing stock should be arrested wherever possible through adequate provision of three-bedroom dwellings in high-density development. In addition, the provision of adequate three-bedroom housing stock is necessary to accommodate the dominant household type in the Parramatta LGA being couples with children (35.5%). The second most common household type is couples without children (23.4%) followed by lone person households (21.5%). In total, 44.5% of households have at least one child. [1] Similarly, in Westmead, the dominant household type is couples with children (33.5%), followed by lone person households (24.3%) and couples without children (22.5%).[2] In Westmead, 38.6% of households have at least one child.[3]

In addition, Council notes that traditional assumptions about housing preferences for families with children are changing. Recent research published in the Australian Planner found that there is a fundamental shift in housing demands in Greater Sydney.[4] Key findings include the following.

> *"…in market societies, the supply of apartments is shaped by a range of market predictions, including developer perceptions of demand, market research, cost constraints and profit margins. It is often observed that these factors produce a* ***misalignment between supply and demand in apartment markets****. Key areas of misalignment include the* ***limited availability of larger apartments (three bedroom);*** *and or apartments that through design, attributes or size, accommodate couples, singles, families, or share households throughout the life course."*

The below figure illustrates that in the City of Parramatta, 32.7% of families live in high density development, which is significantly higher than Greater Sydney (14.2%). Additional, 62.8% of group households live in high density, compared to 47% across Greater Sydney.

[1] https://profile.id.com.au/parramatta/households-with-children?WebID=10&EndYear=2016&DataType=EN
[2] https://profile.id.com.au/parramatta/households?WebID=360
[3] https://profile.id.com.au/parramatta/households-with-children?WebID=360&EndYear=2016&DataType=EN
[4] Cook, N., Herath, S., & Kerr, S. M. (2023). Suburban densification: unpacking the misalignment between resident demand and investor-driven supply of multi-unit housing in Sydney, Australia. Australian Planner, 59(1), 26–38. https://doi.org/10.1080/07293682.2023.2197604

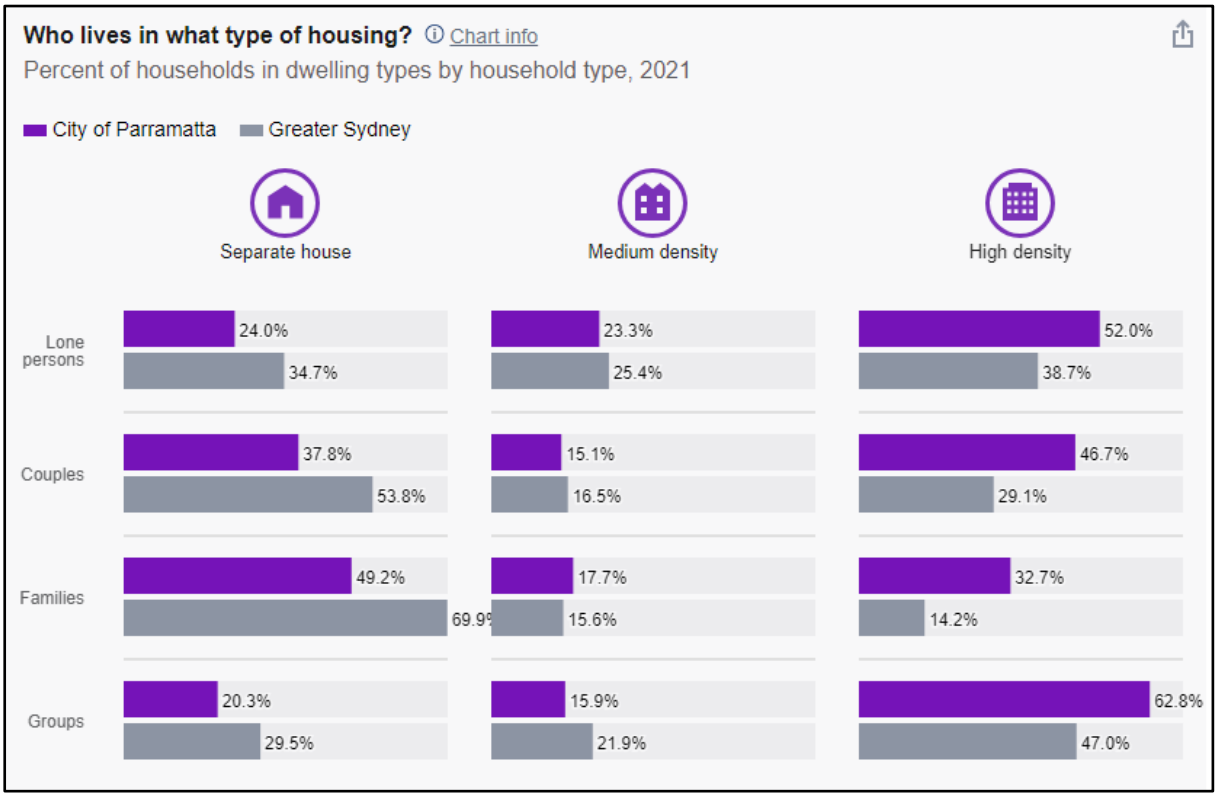

Figure 3 *Comparison of households in different dwelling types in the City of Parramatta and Greater Sydney* (source: profile.id)

Based on the above, Council requests that the proposed dwelling mix be revisited to reflect demographic trends both within Westmead and the Parramatta Local Government Area. It is recommended that the minimum dwelling mix requirements under the *Parramatta Development Control Plan 2023* be adopted for this proposal.

Family-Friendly Considerations for High-Density Development

Council officers recommend that the applicant consider Western Sydney Local Health District's (WSLHD) *Healthy Higher Density Living for Families and Children Guide* to support the design of a family-friendly high-density development. Family-friendly considerations identified in this Guide include:

- Locating family-friendly apartments including three-bedroom apartments on ground or podium level, with direct access to outdoor space to enhance children's opportunities for everyday outdoor play. Where direct access is not possible, ensure that family-friendly apartments have visibility to communal outdoor space for passive supervision of playing children.
- Grouping family-friendly apartments together to encourage social interaction and a sense of community between families with children.
- Integrating permanent playable elements within the outdoor space and/or building facades/blank walls to welcome children and their families to use shared areas for play.

See further discussion on the proposed public park and requirements for play equipment below.

Traffic and Transport

Traffic Generation and Mitigation

Council notes that the application's accompanying Traffic Impact Assessment (TIA) relies on modelling undertaken for the Planning Proposal. The concerns raised by Council over the adoption of this modelling for the Planning Proposal are therefore also applicable to the subject application.

In July 2024, Council endorsed the Toongabbie to Westmead Pedestrian and Cyclist Corridor which will result in traffic changes in the immediate vicinity of the site such as a one-way restriction in Wentworth Avenue. This will mean that the proposed mitigation measures by the Transport Assessment will not be possible.

The Transport Assessment should take this project into account and revise the modelling to determine what the impacts of the proposed development would be with the network changes in place following Council's project. It is noted that as a result of Council's work, there will be additional traffic at the intersection of Byrne Street and Bridge Road that will need to be remodelled as well.

Some mitigation measures identified in the TIA rely on changes within Cumberland City Council (CCC). However, there is no information provided in the TIA as to whether these proposed changes would be agreeable with CCC. Accordingly, the applicant should consult with CCC to ensure that the proposed measures are an agreed outcome for future year scenarios.

Should the applicant update the accompanying TIA to address the above identified concerns, Council recommends that a condition be included on any approval that the mitigation measures be implemented by the developer prior to the occupation of the site and subject to further approval by Council under relevant approval process (i.e. condition sign off and/or approval from the Parramatta Local Traffic Committee).

Parking

The proposed provision of 391 car parking spaces for residents and 48 spaces for visitors is supported. In addition, it is noted that in the application's accompanying TIA that bicycle parking will be provided in accordance with the rates specified in the *Parramatta Development Control Plan 2023*. This will equate to 549 spaces for residents and 55 spaces for residential visitors. In the event of the application's approval, Council recommends that a condition of consent be included requiring this quantity of bicycle parking spaces within the development.

In addition, it is noted that the TIA identifies that nine (9) motorcycle parking spaces will be provided in the development. However, only eight (8) spaces are identified on the plans. Plans should be updated accordingly.

The provision of two (2) car share parking spaces within the development as proposed by the applicant is supported by Council. Council recommends that a condition of consent be imposed in the event of the application's approval requiring that the car share parking spaces be publicly accessible at all times. In addition, right of way easements should be included on the title of the land to ensure public access to these spaces.

Car Park Design

Council notes that parking spaces notated as 7, 8, 9, and 10 on each basement level are adjacent to columns which may obstruct access to these spaces. The columns appear to be reducing the aisle with to between 5.8m and 5.7m. As per the Australian Standards, where

the parking aisle is obstructed on the opposite side to the parking spaces, the aisle width is to be a minimum of 6.1m. Either additional width is to be provided, or swept paths should be provided to demonstrate that access to these spaces will be possible without an excessive number of manoeuvres.

In addition to the above, it is noted that a number of bicycle parking spaces would be inaccessible should there be vehicles parked in adjacent parking spaces. Accordingly, these spaces should be allocated to the same unit that the parking space is allocated (see figure below).

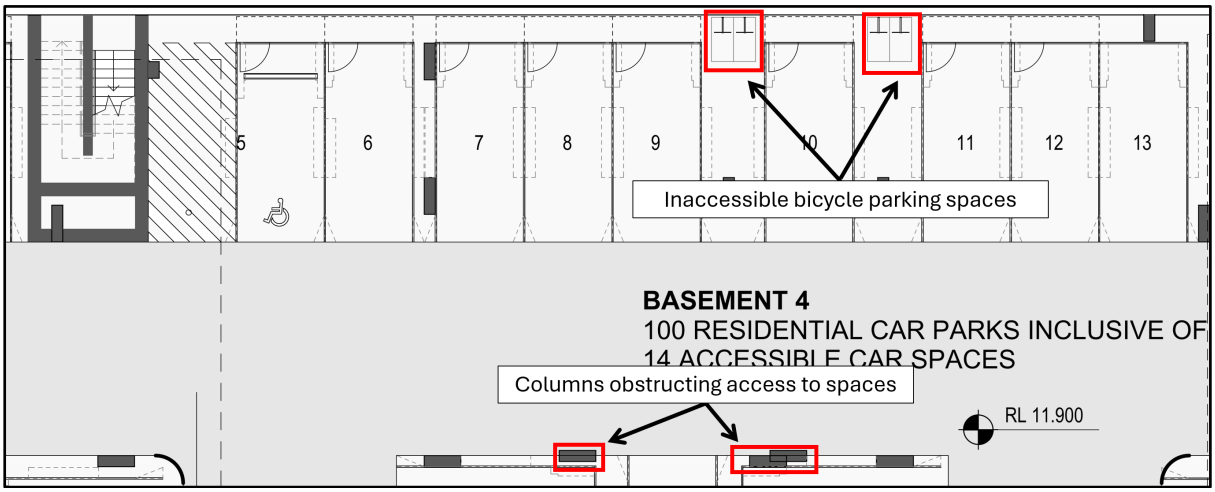

Figure 4 *Basement Car Park Design*

The control point to the carpark must comply with AS 2890.1. In this regard, it is noted that the standards require the grade for at least 6m prior to the control point to not exceed 5%. However, the 5% grade is only provided for 3m prior to the control point which then increases to 12.5%. Accordingly, the location of the control point is to be revised with details to be shown on the plans.

Loading and Servicing

The development proposes the SRV loading bays and one MRV bay which will also be large enough to accommodate a 10.8m Waste Collection vehicle. This provision is considered acceptable.

Construction Traffic Management Plan

Construction vehicle routes need to be mindful of any bridge/culvert structures that are owned by Council particularly along Darcy Road and Briens Road (note that the bridges over the train lines are owned by Sydney Trains). Should access to the site by overmass vehicles be required, Council may require a structural assessment of the bridge/culverts to ensure that the overmass vehicle will be able to safely travel over them. This process will managed through the NHVR process.

In the event of the application's approval, it is recommended that a condition be imposed requiring approval from the National Heavy Vehicle Regulator for any oversize vehicles using local roads. In addition, it is recommended that a condition be imposed requiring a Road Occupancy Permit from Council for any works that involve occupation of any part of the footpath or (public) road during construction.

Landscape & Tree Management

Landscape Communal Open Space

The architectural and landscape plans appear to not be completely coordinated, as there are some paths and entrances into the building from the communal open space shown on the landscape plan that are not shown on the architectural plans on the eastern end. In addition, there are some narrow pinch points in the curved pathways which are not supported, for example there is a 900mm wide pinch point adjacent to a water feature (see figure below). This is recommended to be widened to avoid any potential conflicts along the primary accessible pathway.

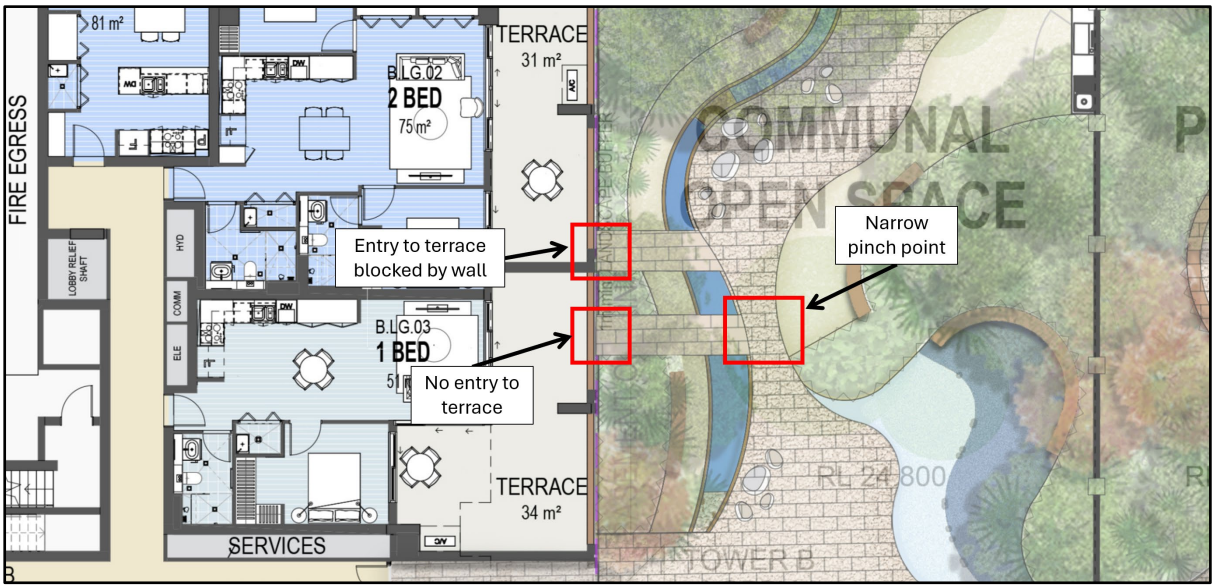

Figure 5 *Inconsistencies in ground floor design*

It is recommended the communal open spaces are consolidated into a larger, well-designed, easily identified, inviting, usable area to achieve a better design outcome. The consolidation of communal open space(s) would better align with the objectives and intent of Part 3D of the Apartment Design Guide.

Pedestrian Footpath & Road Reserve Design

The pedestrian footpath adjacent to the private road includes a series of intermittent stops (labelled as '3' on landscape plans) that are paved areas which appear to have limited function. Council recommends that this area be redesigned to include a focal point and provide pedestrians with a reason to stop at these idents such as using feature plants or seating.

In addition, Council recommends the deletion of the 1.8m separation fencing between the site and the private roadway and replacement with suitable landscaping to deter trespassers onto the site.

Central Communal Open Space Design

Planting areas in the central communal open space appear to be quite narrow and incapable of supporting plants. In particular, areas adjacent to the BBQ covered facility (above the loading dock entrance) are too narrow to support landscaping.

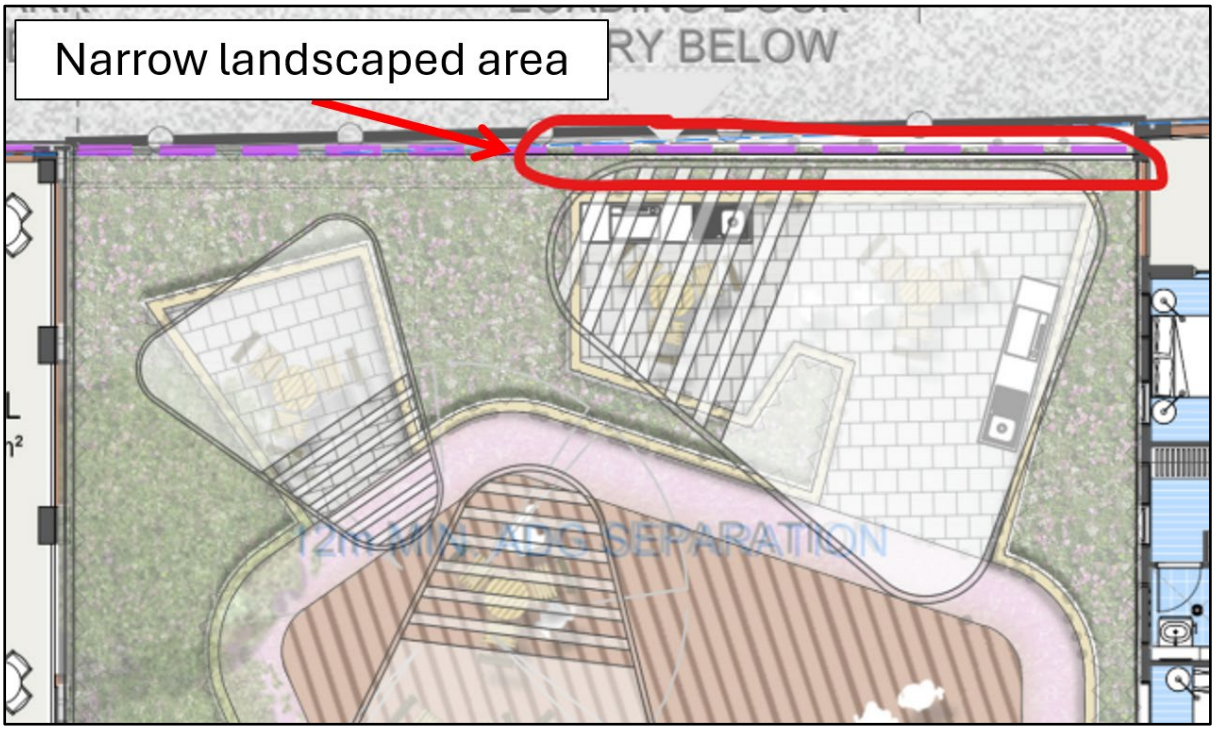

Figure 6 *Central Communal Open Space Design*

In addition, it is unclear whether the proposed development achieves the minimum deep soil landscaping requirements recommended by the Sydney Central City Planning Panel, due to the basement structures underneath. Confirmation of compliance with this recommendation is required, in addition to documentation confirming ADG compliant soil depth and volume area.

Council notes that design drawings indicate that the communal open space between the towers is accessible from the southern access road. Confirmation that compliant access to the elevated central communal open space (shown RL 28.5) from the existing southern access road (existing RL 27.5) is achievable as indicated on all plans, as compliant access across the 10m setback appears improbable.

Council recommends that for communal areas, contiguous (un-isolated) planter boxes for trees be provided.

Existing Tree Impact

Council notes that the majority of existing trees are proposed to be removed from the site which is generally supported. However, trees 7 & 10 (*Corymbia Maculata*) located outside the site boundary will have a major encroachment (up to 25.9%) if traditional construction method of the footpath and planting is carried out within the tree protection zone (TPZ) of these trees. This is not supported. Up to 10% encroachment within the TPZ of a tree (as per AS 4970-2025 Protection of Trees on Development Sites) is considered acceptable. The non-destructive construction detail of any paths above the natural grade and planting method within the TPZ of trees 7 & 10 must be designed in conjunction with the project arborist to ensure neighbouring trees will not be adversely impacted by the construction works.

Should protective measures for trees on neighbouring land be required to facilitate the proposed development, then the adjoining landowners consent must be obtained prior to determination of the application.

Other Matters

Council notes that the lower ground unit labelled 'B.L.G.01' includes a private open space (terrace) which narrows in width to between 1m-1.5m. The space adjoining the master bedroom is poorly design and would not be usable by residents.

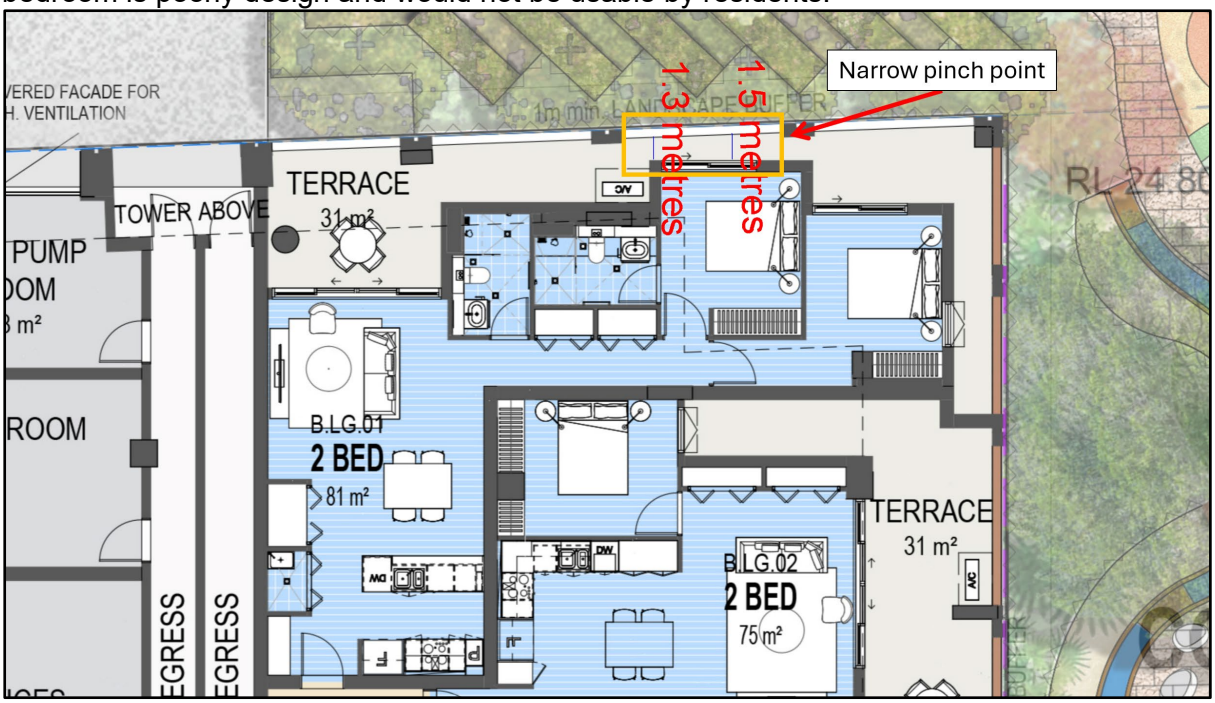

Figure 7 *Unit B.L.G.01 Private Open Space*

Universal Access

All aspects of the design must be delivered according to the requirements of the BCA, AS1428 suite and best practice universal design. The applicant is requested to seek expert access advice to ensure this is achieved. In addition, Council requests that the following matters be addressed.

- No accessible path of travel has been provided to the principle entry /main lobby of Tower B (From Bridge Road) as required within BCA D4D3.
- The controlled access gates must be accessible in both circulation areas and hardware provided.
- Continuous accessible paths of travel must link all the features within the common areas including the communal open spaces to the public park, kitchen garden and pedestrian streetscapes as required within BCA D4D2.
- 549 units are proposed with 56 units proposed to be accessible. However, Council requests that 15% of the units to be accessible in line with best practice.
- 304 single rooms, 225 two-bedroom units and 20 three-bedroom units are proposed, of the proposed 54 accessible units all but 2 of the units are single bedrooms, this is not an suitable outcome and needs to be adjusted to provide an equitable provision of units.
- The proposed post adapted wardrobe within unit type T39 encroaches into the required circulation space beside the bed.
- Ensure the active leaf of doors provide a clear opening no less than 850mm.
- Low level thresholds are required at all doors accessing outdoor and differing areas.
- The Abutment of differing surfaces shall have a smooth transition. Design transition shall be 0 mm. Construction tolerances shall be as follows:
  (a) 0 ±3 mm vertical.
  (b) 0 ±5 mm, provided the edges have a bevelled or rounded edge to reduce the likelihood of tripping. AS1428.1.7.2.

- Equipment and furniture within the communal areas including the communal open spaces will require accessible and inclusive features suitable for a person with a mobility and other impairments. Note: AS1428.2 provides guidance on accessible furniture including, reach ranges and varying heights of tables and seats with back and arm rests.

Stormwater & Catchment Engineering

Council notes that the adequacy of the stormwater drainage pipe identified in the below figure (outlined in red) (DN675) has not been confirmed, given that the stormwater inlets are 2 × DN450, DN375, and DN225 (marked with orange circles).

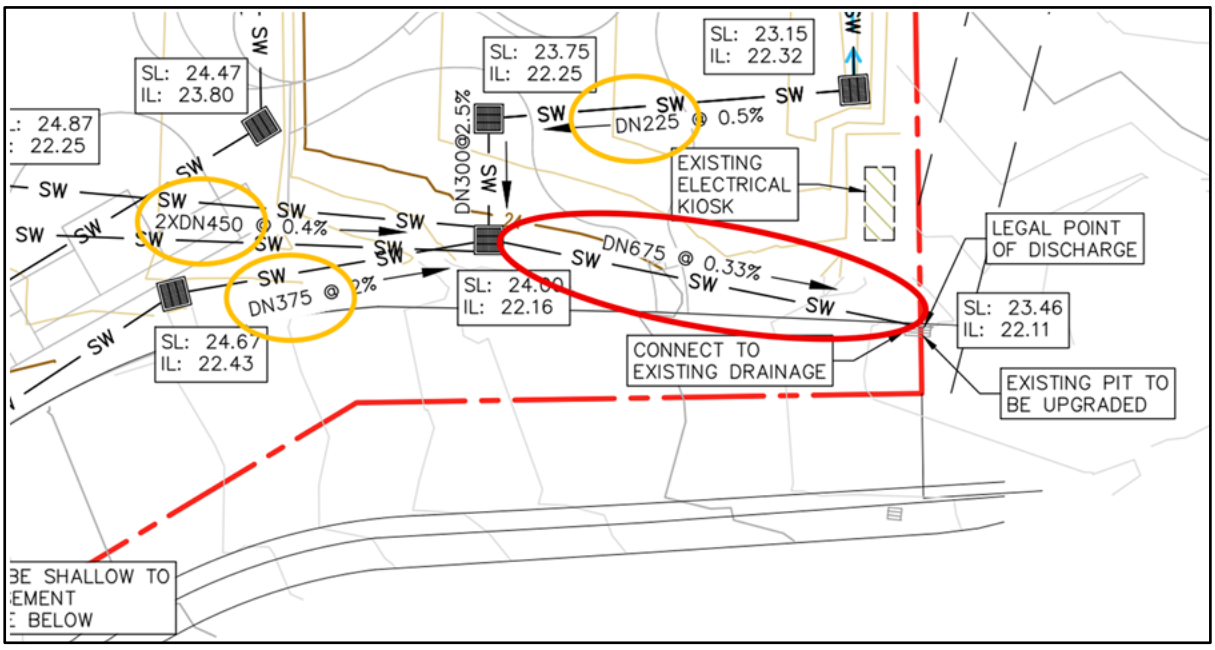

Figure 8 *Stormwater Drainage Pipes*

An electronic copy of the DRAINS model must be submitted, along with an electronic copy of the sub-catchment plan and a brief report demonstrating the adequacy and appropriateness of the proposed drainage infrastructure. Appropriate tailwater conditions, wind-driven rain from both towers, and consideration of climate change as a design case must also be incorporated into the drainage model. It is recommended that the current climate change guidelines (ARR 2019, Version 4.2, Book 1, Chapter 6) be adopted.

All drainage infrastructure must be designed to accommodate 5% AEP storms with 50% blockage in sag pits and 20% blockage in on-grade pits, with safe overland flow paths provided for the 1% AEP event under climate change conditions.

The Stormwater Drainage Plan and longitudinal sections must include the horizontal and vertical positions of all existing and proposed service utilities. All longitudinal drainage sections must include the Hydraulic Grade Line (HGL) for both 5% AEP and 1% AEP (with climate change).

All stormwater drainage designs, pit constructions, and connections should comply with the Council's standard drawings.

<u>Connection to Council's Stormwater System</u>

For connection to Council's stormwater system, the following must be submitted:

- DRAINS modelling demonstrating the adequacy of the Council's stormwater system and confirming no adverse impact on existing connections. Both pre-development and post-development scenarios must be provided.
- Demonstration that discharge at the connection point is less than or equal to predevelopment flows for the 5% and 1% AEP events.

A section 68 approval under the *Local Government Act 1993* is required to allow connection to Council's stormwater pit.

Water Sensitive Urban Design

All WSUD and Gross Pollutant Trap (GPT) devices must be located to allow safe access for heavy vehicles to maintain the structures in accordance with WHS requirements. A brief report outlining background, modelling inputs and references, assumptions, treatment approach, results, conclusions, and recommendations must be provided, along with the electronic copy of the sub-catchment plans for WSUD elements.

Council requests that an electronic copy of the MUSIC model, including relevant background information, must be submitted for review.

Geotechnical Works

Council notes that the submitted geotechnical report includes recommendations that are based on nearby investigations and previous experience. Notwithstanding, a detailed and comprehensive geotechnical investigation must be carried out on the subject site to assess the specific subsurface conditions. Boreholes must extend beyond Basement 4 (RL 11.90 mAHD) to appropriately assess subsurface conditions, including the influence of groundwater yield.

According to the preliminary geotechnical investigation, the estimated annual groundwater inflow is between 2.8 and 6 ML/year. Council only supports the discharge of treated groundwater to Council's stormwater infrastructure during the construction phase. Post-construction discharge to Council stormwater infrastructure is not supported. Therefore, separate documentation must be provided explaining how groundwater will be managed and reused on-site after construction.

If this cannot be demonstrated, Council requests that all basement levels are fully tanked.

Cycleways

Council requests that a shared path be provided along the Bridge Street frontage in accordance with the City of Parramatta Bike Plan 2023..

In addition, Council is generally supportive of the provision of bicycle infrastructure within the proposed development. However, it is requested that at least 50% of visitor bicycle parking infrastructure be located adjacent to principal pedestrian entrances to the building to encourage active modes of transport.

Planning Matters

Intensification of Easement

Notwithstanding whether the proposal is redesigned to facilitate primary vehicular access from the private road to the south of the site, the proposal will likely result in an increase in use of the right-of-way easement that the site presently benefits from. Whilst the terms of this easement appear to be sufficiently broad enough to enable this intensification of use, concern

is raised over the possibility of updated easement terms being required to account for the significant uplift in density at the site. Council requests that the applicant investigate the potential legal ramifications of the intensification of use of the easement and consult with adjoining landowners over ongoing access, use, and maintenance of this road.