

9 November 2018

17297

Ms Carolyn McNally
Secretary
NSW Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2000

Dear Ms McNally,

Attention: David Gainsford, Executive Director, Priority Projects Assessments

**Request for Secretary's Environmental Assessment Requirements
2b-6 Hassall Street, Parramatta**

We write to you on behalf of Western Sydney University, as proponent requesting that the Secretary issue requirements for the preparation of an Environmental Impact Statement (EIS) to accompany a State Significant Development (SSD) Development Application (DA) for a proposed development comprising an educational establishment (tertiary institution), commercial office and retail uses at 2b-6 Hassall Street, Parramatta.

As the proposal includes development for the purpose of a tertiary institution (within the meaning of the *State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017*), including associated research facilities, that has a capital investment value (CIV) in excess of \$30 million, it is designated as SSD for the purposes of the *Environmental Planning and Assessment Act 1979* (EP&A Act), as a consequence of the operation of Clause 15(3) of Schedule 1 of the *State Environmental Planning Policy (State and Regional Development) 2011* (SRD SEPP).

Accordingly, pursuant to Clause 3 of Schedule 2 of the *Environmental Planning and Assessment Regulation 2000* (EP&A Regulation), the proponent requests the issue of Secretary's Environmental Assessment Requirements (SEARs) for the above proposal.

We can confirm that Western Sydney University as joint owner of the subject property, is intended to be the dominant tenant of the proposed building. 52% of floorspace is to be allocated to tertiary education use, totalling some \$63.8 million of a total CIV for the project which is approximately \$122.8 million.

To support the request for SEARs, this letter provides an overview of the proposed development, sets out the statutory context and identifies the key likely environmental and planning issues associated with the proposal. It should be read in conjunction with the following:

- Preliminary Quantity Surveyors statement prepared by WT Partnership (**Attachment A**); and
- Strategy to co-locate collaborative building tenants prepared by Western Sydney University (**Attachment B**).

1.0 The site

1.1 Site location and context

The site is located at 2b-6 Hassall Street, Parramatta within the City of Parramatta Local Government Area (LGA).

The site is located at the eastern end of the Parramatta CBD and is in close proximity to the Parramatta Rail Station and Transport Interchange (100m to the west) and the Parramatta Square urban renewal precinct (250m to the north west).

The site is located in proximity to a number of regionally significant facilities and amenities including the Parramatta Westfield Shopping Centre, the existing Western Sydney University (WSU) Parramatta City Campus, the Council Civic building and Public Library as well as a range of other recreational services provided along the Parramatta River Foreshore.

A location plan is provided at **Figure 1**.

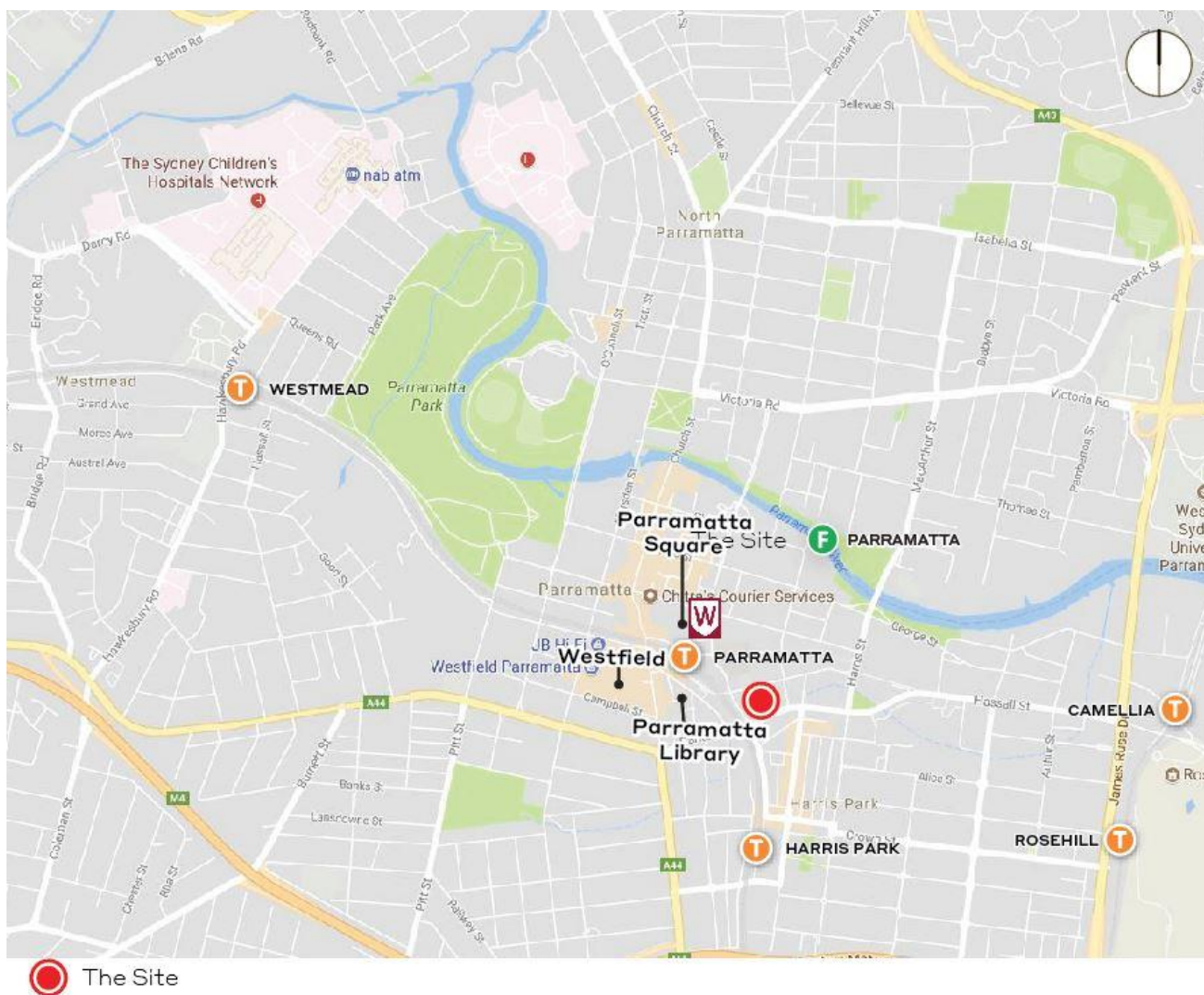


Figure 1 Site location

Source: Google Maps and Ethos Urban

1.2 Site description

The site comprises three allotments of land with a combined area of 2,647m² and dimensions of approximately 62m along the northern and southern boundaries and 45m along the eastern and western boundaries.

The site is legally described as Lot 22 in DP608861, Lot 62 in DP1006215 and Lot 7 in DP128820.

The site has a single road frontage to Hassall Street and has existing vehicular and pedestrian access from Hassall Street. The site is currently occupied by two existing buildings separated by a vacant lot in the centre of the site. The western lot contains a two-storey commercial building. The middle lot contains a vacant parcel of land that has previously contained a single residential dwelling that was demolished in 2011. The eastern lot contains a three-storey residential flat building.

The surrounding development is characterised by a mix of uses and is currently undergoing significant urban regeneration. To the north is the State and Commonwealth heritage listed Lancer Barracks. To the east is the basement driveway to the Curtis Cheng Centre (NSW Police Headquarters) and the PCYC site which is currently subject to a Planning Proposal for a new mixed-use development up to 192m in height. To the south, on the opposite side of Hassall Street is the Eclipse tower and a low scale commercial building. The site adjoins the Commercial Hotel to the west which is a local heritage item.

An aerial image of the site and the surrounding development is provided at **Figure 2** below.

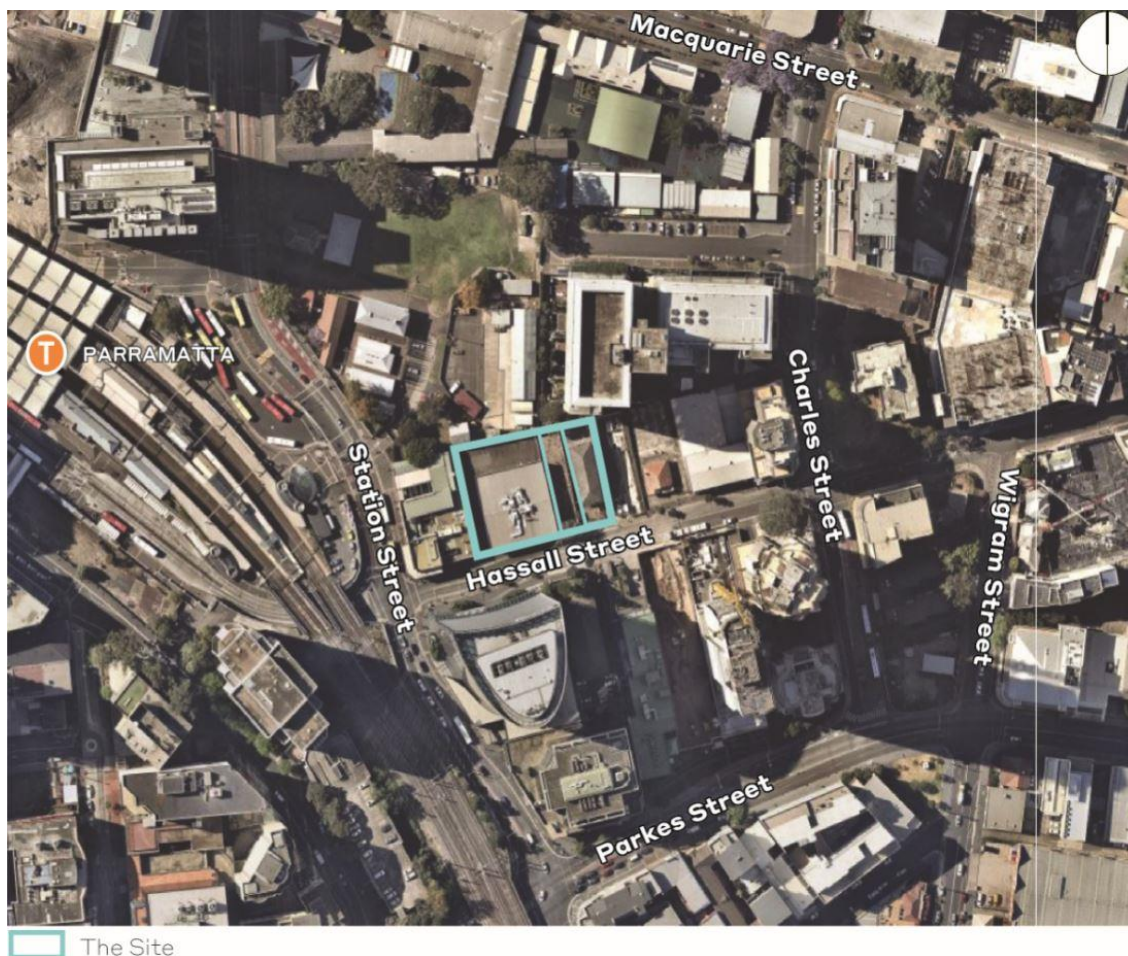


Figure 2 Aerial photo

Source: Nearmap and Ethos Urban

2.0 Background

2.1 Planning Proposal

On 22 December 2017 Charter Hall submitted a Planning Proposal to the City of Parramatta Council. The objective of the Planning Proposal is to amend the *Parramatta Local Environmental Plan 2011* (Parramatta LEP) as it relates to the subject site to align with the strategic context and controls recommended for the site under the CBD Planning Proposal, which is currently under assessment by the Department of Planning and Environment (the Department).

Due to the significant quantity of studies required to inform the Parramatta CBD Planning Proposal and therefore, the timeframe associated with its gazettal, Charter Hall sought to expedite the process of amending the planning controls for the site in accordance with Council's growth objectives for the CBD.

At the Council meeting of 9 April 2018, Council resolved to endorse the Planning Proposal and forward it to the Department for a Gateway Determination.

On 14 June 2018, the Department issued a Gateway Determination in respect of the Planning Proposal to achieve an increase in the FSR control from 6:1 to 10:1 (with a 15% addition to the permissible FSR through achieving design excellence that is discussed further below) and an increase in the height of buildings control from 72m to 86m (approximately 22 storeys). The Department's Gateway Determination Assessment Report noted that:

"The planning proposal should proceed subject to conditions as it reflects the strategic aims of the Parramatta CBD. It will enable a high-density commercial development with corresponding economic benefit. The proposed provisions are generally consistent with the intent of the Parramatta CBD planning strategy and subsequent CBD planning proposal currently under assessment for a Gateway determination".

At the Council meeting of 13 August 2018, the Council resolved to place the Planning Proposal on public exhibition. The terms of the Gateway Determination require the time frame for completing the LEP to be nine months following the date of the Gateway Determination, being 14 March 2019.

2.2 Western Sydney University vision

Western Sydney University is one of Australia's largest universities, its mission is to be a university of international standing and outlook, achieving excellence through scholarship, teaching, learning, research and service to local and international communities, beginning with the people of Greater Western Sydney. Ranked amongst the top three per cent of universities in the world, Western Sydney University is globally focused, research-led and committed to making a positive impact at a regional, national and international level.

The University is embarking on a large-scale transformative program that will bring the highest quality educational opportunities and world-class research expertise to Western Sydney. The University is reshaping its campus network, to combine existing campuses with CBD vertical campuses and is committed to developing campus precincts that connect with and embed business, industry and community partners. Western's vertical campuses deliver high amenity, technology-rich facilities for education and research, supporting innovation, improving community well-being and providing greater accessibility across the region.

Following the Gateway Determination issued for the Planning Proposal on the site, the University entered into a joint venture partnership with Charter Hall to deliver a mixed-use development on the site at 2b-6 Hassall Street, Parramatta, incorporating a new University facility.

The University will establish a state-of-the-art facility for engineering innovation and will offer programs across engineering, architecture and entrepreneurship with broader opportunity for additional programs offered by the School of Computing, Engineering and Mathematics. The facility will provide for both education and research at undergraduate and postgraduate level and accommodate Launchpad, the University's business and innovation support program. Launchpad has an established presence in Parramatta city and will co-locate as part of this facility fostering collaboration between students, start-ups and tenants that will be co-located in the building.

Through the proposed new facility, the University will leverage its distinctive education and research strengths and serve as a focal point for co-creation, exchange and translation with business, industry and community. The University's plan is open the new facility for the beginning of 2021. Refer to **Attachment B** for further details.

The strength of the WSU's commitment to diversify the university's offering and teaching models is reflected in the success of the existing Parramatta City campus at 1 Parramatta Square which is approximately 250m to the north west of the site. This project will build on the success of the University's existing Parramatta City campus and concentrate Western's facilities along with the new vertical primary and high schools (currently under development) to form an education cluster in the heart of the CBD.

3.0 Proposed development

The SSD DA will seek consent for the redevelopment of the site as a mixed-use development comprising a tertiary institution, commercial and retail uses. Specifically, the proposal will seek approval for:

- Basement construction including parking to service the future building;
- Construction and use of a mixed-use building of approximately 19 storeys, containing approximately 30,440m² of GFA (assumed site FSR of 11.5:1 following a design excellence process) including;
 - ground floor retail tenancies;
 - tertiary institution and supporting commercial office floor space; and
- Public domain and landscape works including a through-site link and podium terraces.

Indicative plans are provided in **Figure 3** to **Figure 5**. The floor plans are conceptual only, as the detailed design will be subject to a competitive design process as required by Clause 7.10 of the Parramatta LEP 2011, and facilitated by the NSW Government Architect’s Office together with City of Parramatta Council.



Figure 3 Indicative basement plan

Source: Architectus

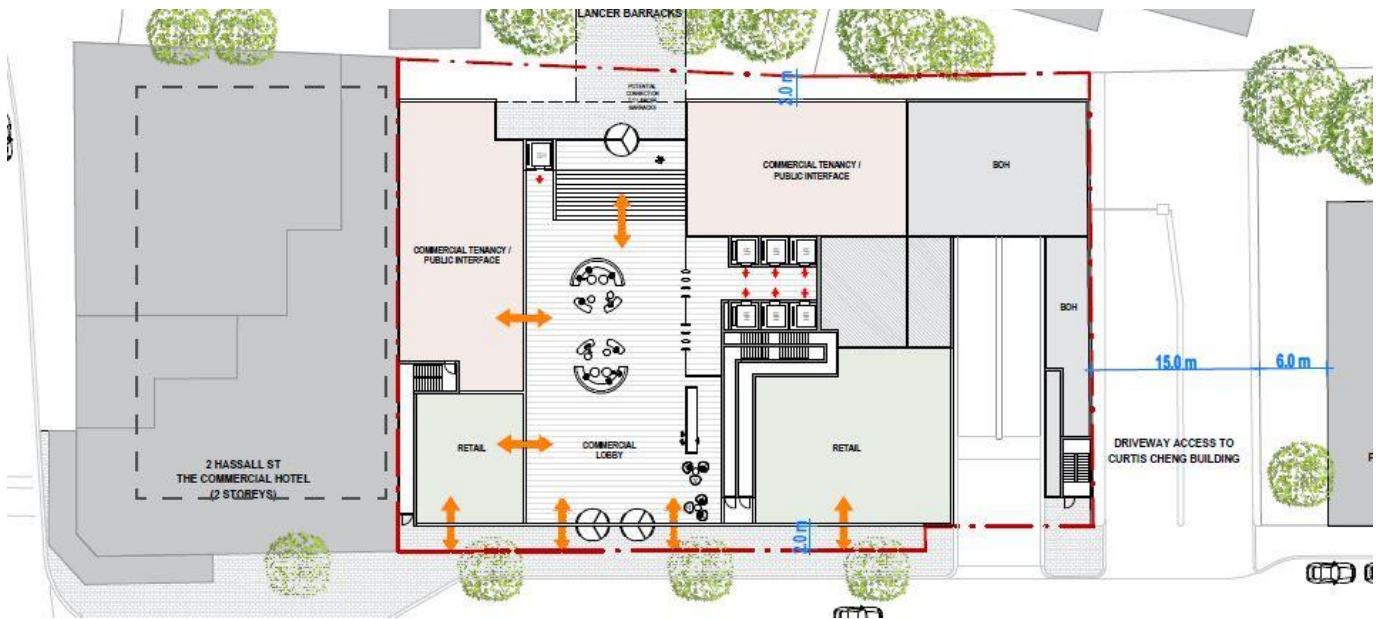


Figure 4 Indicative ground floor plan

Source: Architectus

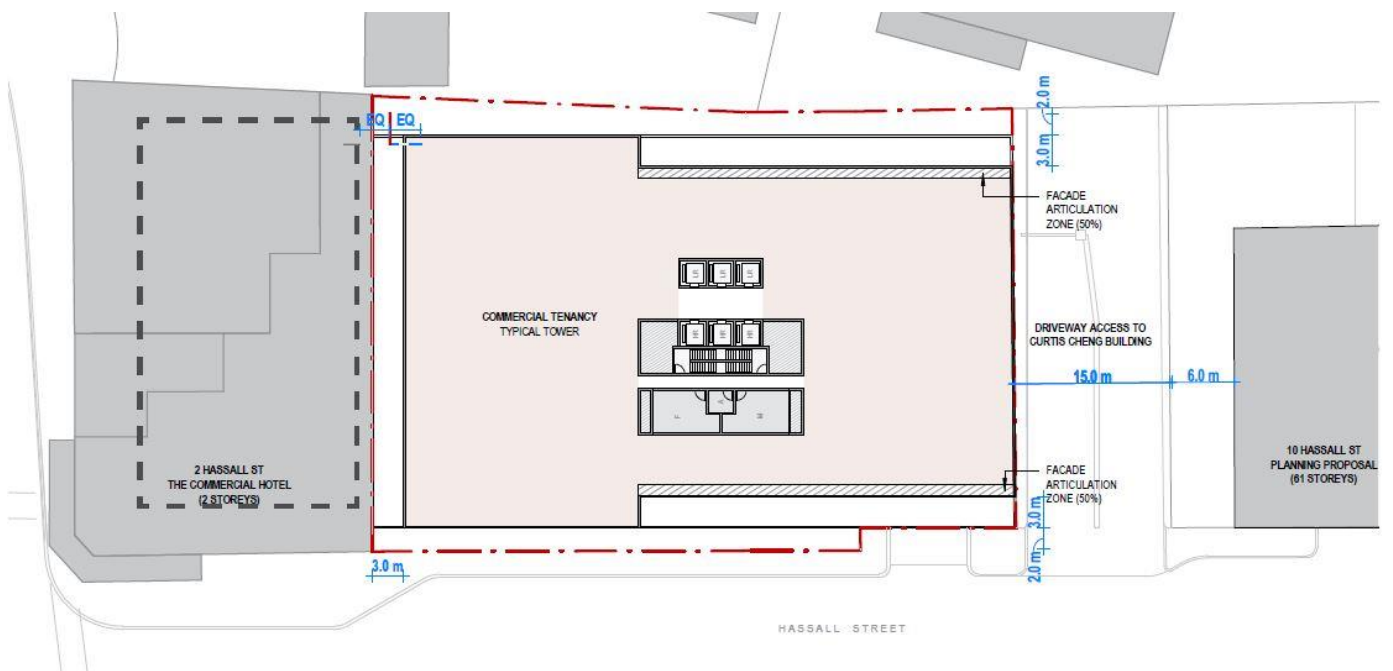


Figure 5 Indicative commercial/educational floor plate

Source: Architectus

3.1 Early works strategy

The overall project timeframe is centred on the delivery of a completed project and the opening of the WSU tertiary institution by Q1 2021, ready for the first semester of that year. In order to meet this critical time frame, an initial 'Crown' DA for early works on site – separately from the SSD DA – will be lodged with Parramatta City Council, which seeks approval to undertake:

- Demolition of existing structures; and
- Removal of two trees fronting Hassall Street; and
- Archaeological investigations and archaeological salvage works.

The works above can be pursued independently of the SSD DA as they will form an application for works characterised as 'demolition', which is permissible with consent on the site by virtue of Clause 2.7 of the Parramatta LEP 2011.

In order to meet the critical timeframe for the project, additional 'early works' associated with the project would also be required to commence in advance of the determination of the SSD DA. These include:

- Excavation;
- Piling; and
- Construction of retaining structures.
(together, 'early works')

The characterisation of these works however extends beyond 'demolition' and must be considered as part of the characterisation of the use of land. This situation requires consideration of the operation of clause 8(2) of the SRD SEPP. That clause relevantly provides that:

- where a single proposed development the subject of one development application comprises development that is only partly State significant development (in this case, the tertiary institution component), the remainder of the development is also declared to be State significant development; and
- however, any part of the remainder of the development (in this case, for example, the preparatory works for a commercial building) as the Secretary determines is not sufficiently related to the State significant development, is not declared to be State significant development.

In these circumstances, it is requested that the Secretary form the opinion that these additional 'early works' are not sufficiently related to the SSD DA, in accordance with the discretion permitted under Clause 8(2)(a) of the SRD SEPP, so that they may be carried out separately under a Crown DA made to Parramatta Council.

There are sound grounds for determining that the proposed early works are not sufficiently related to the SSD application. The applicant requests that the Secretary form the view that the works described above are not SSD on the basis that the proposed works package (excavation, piling and construction of retaining structures) are not specific to a tertiary institution use, and merely facilitate the tertiary institution use above. These works are proposed (and would be required) to deliver the commercial use in the form of office premises on the site, which is envisaged by the B3 Commercial Core zoning of the site and the site's strategic location in the Parramatta City Centre.

Accordingly, such works, should they be determined to not be sufficiently related to the SSD, would form part of a separate and subsequent Crown DA to Parramatta City Council. These works would be for the general purpose of a future commercial building, as per the approach taken with the construction of the basement for the 3 Parramatta Square project at 153 Macquarie Street and Part 1A Civic Place, Parramatta (DA/358/2015). In those circumstances:

- The applicant (Council) proposed the construction of a three-level basement car park as well as ancillary essential services at ground level, and land subdivision in an early works DA. The basement construction

related to the future development of a 14-storey commercial office building which was the subject of a separate DA following the completion of a design competition. Concept designs for the main building were included with the early works DA for reference purposes only; and

- The proposal, for the purposes of permissibility, was defined as a “car park”, which was permissible with consent in the B3 Commercial Core and B4 Mixed Use Zone under the then Parramatta City Centre LEP 2007 (now repealed). The same and similar circumstances apply to the WSU site at Hassall Street.

The benefits of this approach would allow the expedited local assessment and determination of an application for these additional ‘early works’, which are key to ensuring the development can proceed according to the timeline for project completion in Q1 2021. Should these enabling works not be able to occur prior to the determination of the SSD DA, the project would be unlikely to meet this timeframe for opening.

It is noted that DPE indicated their support for the ‘early works’ strategy at a meeting of 5 September 2018 and in correspondence dated 20 September 2018.

3.2 Cost of works

A preliminary cost estimate of the development is appended to this SEARs request, being a capital investment value (CIV) of approximately \$122,700,000. Refer to **Attachment A** for a cost breakdown of the project, prepared by WT Partnership.

The tertiary institution component is proposed to constitute 52% of the Net Lettable Area (NLA) of the development, therefore resulting in this component being the dominant use within the development.

Further, the balance of remaining NLA equating to 48%, will be occupied by specifically chosen co-located tenants with the intention that they will foster innovation and collaboration with WSU. Refer to further discussion on this intended strategy by WSU, provided at **Attachment B**.

4.0 Statutory and strategic planning context

The following are the key relevant pieces of legislation, environmental planning instruments and strategic policies that will apply to the proposed development:

- *Environmental Planning and Assessment Act 1979*;
- *State Environmental Planning Policy (State and Regional Development) 2011*;
- *Parramatta Local Environmental Plan 2011*;
- *Parramatta CBD Planning Proposal*;
- *Greater Sydney Region Plan – A Metropolis of Three Cities*; and
- *Central City District Plan*.

Other plans and policies that will be addressed are identified at **Section 4.7**.

4.1 Environmental Planning and Assessment Act 1979

The Environmental Planning and Assessment Act 1979 (EP&A Act) establishes the assessment framework for SSD. Under Section 4.5(a) of the EP&A Act, the Minister for Planning is the consent authority for State Significant Development. Section 4.12(8) requires that a DA for SSD is to be accompanied by an EIS. This request for SEARs will inform the subject matter of the EIS.

4.2 State Environmental Planning Policy (State and Regional Development) 2011

State Environmental Planning Policy (State and Regional Development) 2011 (SRD SEPP) declares certain development to be SSD. Under Schedule 1 of the SEPP, a tertiary institution with a CIV of over \$30 million is identified as SSD for the purposes of the EP&A Act. As demonstrated in the introduction to this SEARs request, the proposed tertiary institution use meets the applicable criteria to be declared SSD under clause 8(a) of the SRD SEPP.

Whilst the commercial component of the development does not qualify as SSD in its own right, under Clause 8(2)(a) of the SRD SEPP, where a proposal comprises development that is only partly SSD, the remainder of the development is also declared to be SSD¹. As demonstrated in **Section 2.2** above, the proposed development is for a fully integrated development with physical and functional link opportunities between the education and commercial uses.

However, a request has also been made as part of this document for the Secretary to determine, under clause 8(2)(a) of the SRD SEPP, that the development defined as 'early works' is not sufficiently related to the SSD DA, such that approval for the early works may be locally sought by way of a Crown DA to Parramatta Council.

4.3 Parramatta Local Environmental Plan 2011

Under the Parramatta LEP 2011, the site is zoned B3 Commercial Core. This zone permits a wide range of uses, including educational establishments, commercial and retail uses. The site currently has a mapped maximum building height of 72m and FSR of 6:1.

Notwithstanding the above, the proposed planning controls for the site under the Planning Proposal have been endorsed by Council and are the subject of a Gateway Determination (refer to **Section 2.1**), which are consistent with the envisaged controls under the CBD Planning Proposal and discussed in **Section 4.6** below. Accordingly, the proposal would run in parallel with the gazettal of the Planning Proposal, which is on track to occur in March 2019.

¹ Except for so much of the remainder of the development as the Director-General determines is not sufficiently related to the State significant development (Clause 8(2)(a)).

4.3.1 Clause 5.10 Heritage Conservation

The site is not listed as a heritage item or located within a heritage conservation area, however, it is in proximity to a number of heritage items as listed below:

- I01824: 1st/15th Royal NSW Lancer Museum collection (State and Commonwealth listing);
- I751: Lancer Barracks group (Local);
- 105512: Lancer Barracks Precinct (Commonwealth);
- I707: Commercial Hotel (Local); and
- I00696: Parramatta Railway Station (State).

A Statement of Heritage Impact will be prepared and submitted with the SSD DA assessing the proposal's impact on neighbouring heritage items.

4.3.2 Clause 7.10 Design Excellence – Parramatta City Centre

Clause 7.10 of the Parramatta LEP 2011 applies to development involving the erection of a new building. Development consent must not be granted to development to which the clause applies unless, in the opinion of the consent authority, the proposed development exhibits design excellence. Furthermore, development consent must not be granted to the following development to which the clause applies unless a competitive design process has been held in relation to the proposed development (our emphasis in bold):

- **(a) development in respect of a building that has, or will have, a height above ground level (existing) greater than 55 metres,**
- *(b) development on a site greater than 1,000 square metres and up to 1,800 square metres seeking to achieve the maximum floor space ratio identified on the Floor Space Ratio Map, where amalgamation with adjoining sites is not physically possible,*
- *(c) development having a capital value of more than \$10,000,000 on a "Key site" identified on the Key Sites Map,*
- **(d) development having a capital value of more than \$100,000,000 on any other site,**
- *(e) development for which the applicant has chosen such a process.*

The proposal triggers the thresholds of (a) and (d) above. Accordingly, a competitive design process is required to be undertaken for the proposed development.

Clause 7.10(8) provides that if the design of a new building is the winner of a competitive design process and the consent authority is satisfied that the building exhibits design excellence, it may grant development consent to the erection of the new building, with a building height that exceeds the maximum height shown for the land on the Height of Buildings Map or an amount of floor space that exceeds the maximum floor space ratio shown for the land on the Floor Space Ratio Map (or both) by up to 15%.

Whilst the detailed design of the proposal will follow the design competition to be undertaken, this provision would permit the total FSR of the building to be 11.5:1, factoring in the 15% bonus above the proposed 10:1 base FSR the subject of the Planning Proposal.

In accordance with the procedures established for SSD projects, the design competition will be conducted in accordance with the Director General's Design Excellence Guidelines, involving input from the NSW Government Architect and Council in developing the design competition brief. The competition commenced on 2 October 2018 and is scheduled to close on 30 October 2018. The winning competitor will be formally appointed following Jury deliberations.

4.4 The Greater Sydney Region Plan

The Greater Sydney Commission (GSC) has released the Greater Sydney Regional Plan *A Metropolis of Three Cities* which is a revision to *A Plan for Growing Sydney*. The Plan sets a 40-year vision (up to 2056) and establishes a 20-year plan to manage growth and change for Greater Sydney in the context of economic, social and environmental matters.

The GSC's vision seeks to meet the needs of a growing and changing population by transforming Greater Sydney into a metropolis of three 30-minute cities including the Western Parkland City, the Central River City and the Eastern Harbour City. The site is located within Parramatta which will form the Central River City CBD.

By delivering a building with a dominant use as a tertiary education facility, in proximity to existing and planned high capacity transport links as well as high density residential development, the proposed development aligns with the following productivity objectives:

- Objective 9: Greater Sydney celebrates the arts and supports creative industries and innovation;
- Objective 14: A metropolis of three cities – integrated land use and transport creates walkable and 30-minute cities;
- Objective 15: The Eastern, GOP and Western Economic Corridors are better connected and more competitive;
- Objective 19: Greater Parramatta is stronger and better connected;
- Objective 21: Internationally competitive health, education, research and innovation precincts; and
- Objective 22: Investment and business activity in centres.

The proposal will support the objectives of the Central CBD and further improving the educational and commercial facilities in Parramatta.

4.5 Central City District Plan

The District Plans form the link between the overarching Greater Sydney Region Plan and Council's LEP. The Central City District Plan includes specific objectives and actions to strengthen the productivity of Sydney's second CBD. The proposed development is consistent with the following productivity planning priorities outlined in the District Plan:

- C7: Growing a stronger and more competitive Greater Parramatta;
- C8: Delivering a more connected and competitive GOP Economic Corridor;
- C9: Delivering integrated land use and transport planning and a 30-minute city;
- C10: Growing investment, business opportunities and jobs in strategic centres;
- C11: Maximising opportunities to attract advanced manufacturing and innovation in industrial and urban services land; and
- C12: Supporting growth of targeted industry sectors.

This key site in the CBD presents a significant opportunity to contribute commercial and education floorspace; jobs close to home and to realise the vision of Parramatta as Greater Sydney's Central City.

4.6 Parramatta CBD Planning Strategy and CBD Planning Proposal

The Parramatta CBD Planning Strategy was adopted by Council at its meeting of 27 April 2015 and provides the framework for Council's CBD Planning Proposal which was subsequently adopted by Council on 11 April 2016.

Generally, the CBD PP seeks to increase heights and FSRs in the Parramatta CBD, subject to the provision of community infrastructure and other requirements. The CBD PP remains Council's most recently endorsed policy

position on density increases in the Parramatta CBD. Council is currently awaiting a Gateway Determination on the CBD PP from the Department of Planning and Environment.

Under the Parramatta CBD PP, the following key planning controls are identified for the site:

Zoning

The current B3 Commercial Core zoning is retained.

Height of Buildings

There is no “base” or “incentive” maximum HOB control proposed for this site. This is consistent with the general policy direction of the CBD Planning Proposal, which is that, for most sites in the CBD, there are no maximum incentive height controls, with maximum building heights, instead being effectively controlled by sun access planes and aviation operational parameters.

Floor Space Ratio

The CBD Planning Proposal proposes a base FSR control of 10:1 across the site, however, there are additional FSR incentives that can be utilised on the site to reach an FSR beyond 10:1. These include:

- Design Competition: 15% bonus of Incentive FSR (i.e. 1.5:1 in this case) over and above the base FSR, provided that a Design Excellence process has been undertaken in accordance with the PLEP 2011; and
- Office premises in B3 Commercial Core Zone: The CBD Planning Proposal includes a provision to remove the FSR control for sites that propose office premises in the B3 zone.

As such, the CBD Planning Proposal envisages significant uplift on the site. The proposal will expedite the growth of the Parramatta CBD and bring that development forward to meet market demand.

4.7 Other Planning Policies

In addition to the above, the following environmental planning instruments apply to the site and will need to be considered as part of the SSD application:

- *State Environmental Planning Policy No. 55 – Remediation of Land;*
- *State Environmental Planning Policy No. 64 – Advertising and Signage;*
- *State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017;*
- *State Environmental Planning Policy (Infrastructure) 2007;*
- *Sydney Regional Environmental Plan (Sydney Harbour Catchment) 2005;*
- *NSW State Priorities;*
- *The Future Transport 2056 Strategy;*
- *Sydney’s Cycling Future 2013;*
- *Sydney’s Walking Future 2013;*
- *Sydney’s Bus Future 2013;*
- *Crime Prevention Through Environmental Design Principles; and*
- *Healthy Urban Development Checklist.*

The EIS will provide an assessment of the proposed development against the above instruments and policies and will provide justification for any variations proposed where appropriate.

5.0 Overview of likely environmental and planning issues

Based on our preliminary environmental assessment, the following are the key environmental assessment issues that will need to be considered as part of the future DA.

5.1 Urban design, built form and design excellence

The EIS will address the height, density, bulk and scale of the proposed development in the context of the site and will demonstrate how the proposal integrates with the local environment and the desired future character of the area. The EIS will also demonstrate how the proposal achieves design excellence and will be the result of a competitive design process.

The EIS will also address how the form, layout and siting of the building achieves optimal design and amenity outcomes. An architectural design statement prepared by the winner of the design competition explaining the design principles of the building, the design responses to surrounding development and the Hassall Street streetscape.

5.2 Heritage

A Statement of Heritage Impact will be submitted with the EIS to address the proposal's impacts on surrounding heritage items, in particular the adjoining Lancer Barracks to the north and Commercial Hotel to the west. Opportunities for allowing the future integration of the site with the Lancer Barracks to the north will be explored.

5.3 Overshadowing

The EIS will include shadow diagrams, demonstrating the shadowing impacts that will be incurred as a result of the proposed building within the context of the surrounding buildings to the south along Hassall Street. In particular, the impacts to surrounding development will be demonstrated.

5.4 Public domain and landscaping

A Landscaping Plan will be submitted with the EIS providing details of publicly accessible areas and finishes, including indicative public domain upgrades adjacent to the site.

5.5 Traffic, access and parking

A Traffic and Parking Statement will accompany the application which that will detail the accessibility of the site, and the suitability of servicing facilities available for the proposed development.

5.6 Acoustics and vibration

An Acoustic and Vibration Management Plan will be prepared as part of the EIS. The potential noise impacts created by the proposed development will also be considered in the EIS.

5.7 Waste management

A Waste Management Plan will be prepared as part of the EIS. The plan will indicate the collection points and method of removal from the site, including the various waste streams from the different uses proposed. The report will include details of the waste storage and collection arrangements for the proposed uses.

5.8 Ecologically sustainable development

An ESD report will accompany the application. This report as well as the EIS will consider the relevant ESD principles, as well as to meet any applicable standards or codes, and will assess the proposal's overall level of sustainable design.

5.9 Archaeology

As part of the impending early works DAs as detailed at **Section 0**, approval will be sought for archaeological site investigations (European and Aboriginal). To this end the relevant integrated approvals will be obtained through the early works DA including an Aboriginal Heritage Impact Permit (AHIP) and a Section 140 Archaeological Permit (as required).

Archaeological testing and any salvage excavations will only be undertaken once the AHIP has been received prior to redevelopment of the site.

Further consideration, in addition to that given under the early works DA, will be given to archaeological factors as part of the SSD DA.

5.10 Accessibility

An Access Statement will be prepared by a qualified accessibility consultant to ensure the proposed development will be capable of providing universal access to all publicly accessible areas in accordance with relevant Australian Standards.

5.11 Amenity impacts

The EIS will detail amenity impacts including solar access, visual privacy, view loss and overshadowing to neighbouring properties. The proposal will be carefully planned with regard for surrounding development to ensure a high level of amenity is maintained for neighbouring developments as well students and staff occupying the proposed development.

5.12 Stormwater and flooding

Stormwater and flooding impacts will be assessed by a qualified consultant and the assessment will be provided with the submission of the EIS.

5.13 BCA

A BCA Report will be submitted as part of the EIS to confirm that the proposal will be capable of complying with the relevant provisions of the BCA.

5.14 Construction and operational impacts

The EIS will address and consider the construction and operation impacts of or on:

- Noise and vibration;
- Soil, groundwater and geotechnical attributes of the site and environs;
- Access, parking and traffic;
- Stormwater and air-borne pollutant control; and
- Servicing and infrastructure for the development.

5.15 Utilities

Information on the proposed site services will be provided which will confirm that the existing site services can be suitably augmented to accommodate the proposed development.

6.0 Consultation

In preparing the EIS, it is expected that the proponent will undertake consultation with the following:

- Office of Government Architect;
- City of Parramatta Council;
- Transport for NSW;
- Office of Environment and Heritage;
- the relevant Local Aboriginal Land Council;
- Roads and Maritime Services;
- Surrounding landholders and the community;
- NSW Police;
- The Australian Heritage Council; and
- NSW Department of Education.

7.0 Conclusion

The purpose of this letter is to request the SEARs for the preparation of an EIS for the proposed mixed tertiary, commercial and retail development at 2b-6 Hassall Street, Parramatta, excluding those 'early works' for which approval will be sought from Parramatta Council. This document also seeks the Secretary's determination under clause 8(2)(a) of the SRD SEPP that the 'early works' are not sufficiently related to the proposed SSD DA, which will facilitate the approval of those works as outlined above.

It includes a description of the proposed development and an outline of what are considered to be the key issues for the assessment of the SSD DA.

We trust that the information detailed in this letter is sufficient to enable the Secretary to issue the SEARs for the preparation of the EIS and make the determination requested above. Should you have any queries about this matter, please do not hesitate to contact me on 02 9956 6962 or at cferreira@ethosurban.com.

Yours sincerely,



Chris Ferreira
Principal, Planning
02 9956 6962
cferreira@ethosurban.com



Clare Swan
Director, Planning
02 9956 6962
cswan@ethosurban.com