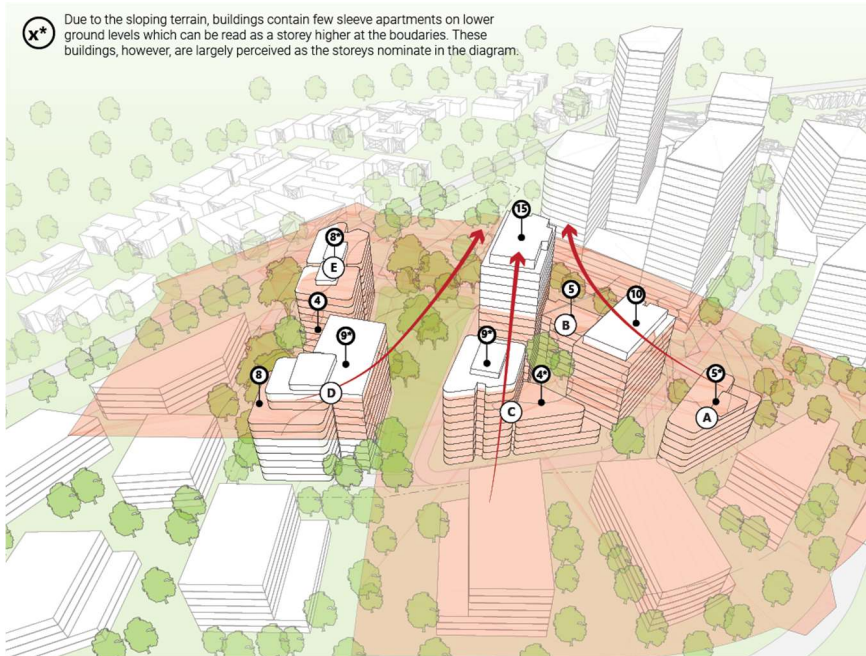


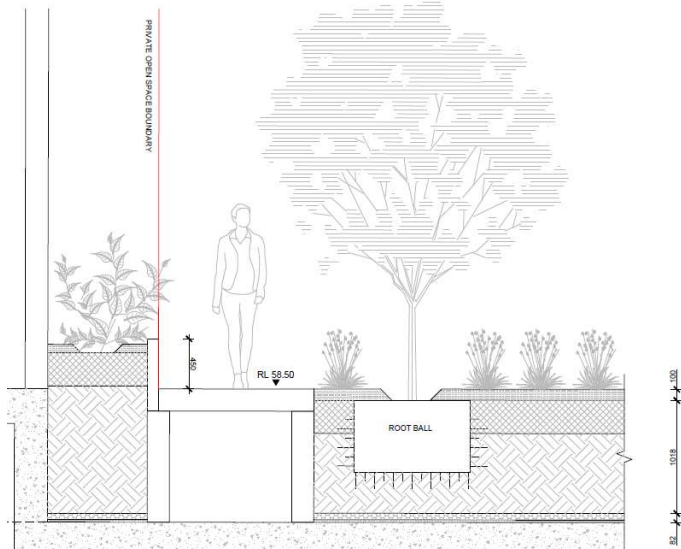
Council Comments (February 2023)	FPA Response	Reference Drawings																																																												
1. Land Use Planning There are discrepancies between the proposed GFA for Stage 1A shown in different area schedules. The area schedule in the Stage 1A Design Report Appendix shows a proposed total GFA of 37,096sqm, the area schedule in Appendix C2 and the Clause 4.6 for Stage 1A has a total GFA of 36,967sqm. These discrepancies need to be addressed.	The proposed Stage 1A GFA is 37,130sqm and has been updated across all documentation. Based on a Stage 1A site area of 18,150sqm, the maximum permissible GFA is 39,930sqm. This comprises application of: - a base FSR of 1.7:1 under the PLEP 2011 resulting in a maximum permissible base GFA of 30,855sqm; and - a bonus FSR of 0.5:1 under clause 6(2) and 1392) of the Affordable Rental Housing SEPP resulting in 9,075sqm. The proposed GFA is 2800sqm below the maximum permissible GFA. Accordingly, a clause 4.6 variation request is not required.	- Stage 1A DA Design Report pg.12, 73, 74, 81 - Stage 1A Telopea Development Schedule <table><tr><td>Site Area (excl RE1)</td><td>18,150sqm</td></tr><tr><td>Base 1.7:1 FSR</td><td>30,855sqm</td></tr><tr><td>Bonus 0.5:1 FSR</td><td>9,075sqm</td></tr><tr><td>Total permissible GFA</td><td>39,930sqm</td></tr><tr><td>Proposed GFA</td><td>37,130sqm</td></tr></table>	Site Area (excl RE1)	18,150sqm	Base 1.7:1 FSR	30,855sqm	Bonus 0.5:1 FSR	9,075sqm	Total permissible GFA	39,930sqm	Proposed GFA	37,130sqm																																																		
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The further increases to height variation for Stage 1A are not supported. Significant additional increases have been included in the December 2022 package. The rationale for the proposed exceedances is that there have been building envelope changes, and that Stage 1A is a GFA compliance scheme. As detailed below, the scheme is not FSR/GFA compliant and building envelope matters raised by Council consistently remain outstanding. It is considered important to manage the height within the Stage 1A area to distinguish it from the denser Core on the other side of Sturt Street and to provide a strong height transition away from the light rail stop and down into the lower-scale suburban areas.	As demonstrated above, the scheme is GFA compliant. The redistribution of compliant GFA results in proposed exceedances of the maximum building heights permitted under the PLEP 2011 for Building B, C, D and E. <table><tr><th>Building</th><th>DA (July 2021) (Building parapet or roof RL excl over-run)</th><th>RTS1 (Mar 2022) (Building parapet or roof RL excl over-run)</th><th>RTS2 (Dec 2022) (Building parapet or roof RL excl over-run)</th><th>RTS3 (June 2023) (Building parapet or roof RL excl over-run)</th></tr><tr><td>Building A</td><td>71.750</td><td>71.750</td><td>71.750</td><td>71.750</td></tr><tr><td>Building B</td><td>104.500</td><td>104.500</td><td>106.700</td><td>106.700</td></tr><tr><td>Building C</td><td>88.807</td><td>88.807</td><td>88.807</td><td>88.807</td></tr><tr><td>Building D</td><td>88.050</td><td>88.050</td><td>88.050</td><td>88.050</td></tr><tr><td>Building E</td><td>84.030</td><td>84.030</td><td>84.030</td><td>84.030</td></tr></table> <table><tr><th>Building</th><th>PLEP 2011 Maximum Height (m)</th><th>Stage 1A Project Application Proposed Height (m)</th><th>Variance Approx (m)</th><th>Variance (%)</th></tr><tr><td>Building A</td><td>28m</td><td>18.58m</td><td>-9.42m</td><td>-33.6%</td></tr><tr><td>Building B</td><td>28m</td><td>48.88m</td><td>+20.88m</td><td>+74.5%</td></tr><tr><td>Building C</td><td>28m</td><td>31.90m</td><td>+3.90m</td><td>+13.9%</td></tr><tr><td>Building D</td><td>28m</td><td>32.12m</td><td>+4.12m</td><td>+14.7%</td></tr><tr><td>Building E</td><td>28m</td><td>30.13m</td><td>+2.13m</td><td>+7.6%</td></tr></table> <i>*Proposed height is approximated due to the complexity of the sloping terrain</i> The proposed redistribution of building height is the result of multiple design related factors, including feedback from the SDRP and Council, which advocated for Stage 1A to be reviewed to maximise access, public open space, and residential amenity. The proposed variation to the building height controls allows greater public benefits to be achieved when compared to a scheme that complies with PLEP 2011’s maximum building heights. Despite the numerical non-compliances, the Stage 1A Project Application’s proposed height and design proposition achieves: - improved distribution of building typologies and scales across the Stage 1A site, including height concentrated towards the Telopea Core Precinct; - reduced built forms that better respond to topography and landscape; - a smaller footprint tower expression which allows for more ground plane activation, wider streetscapes, and human scaled podium expressions compared to traditional building massing with a bigger footprint that is height compliant; - improved interface between building forms and building frontages, including the podium base and tower compositional elements identified in Buildings B, C and D to break up bulk and scale;	Building	DA (July 2021) (Building parapet or roof RL excl over-run)	RTS1 (Mar 2022) (Building parapet or roof RL excl over-run)	RTS2 (Dec 2022) (Building parapet or roof RL excl over-run)	RTS3 (June 2023) (Building parapet or roof RL excl over-run)	Building A	71.750	71.750	71.750	71.750	Building B	104.500	104.500	106.700	106.700	Building C	88.807	88.807	88.807	88.807	Building D	88.050	88.050	88.050	88.050	Building E	84.030	84.030	84.030	84.030	Building	PLEP 2011 Maximum Height (m)	Stage 1A Project Application Proposed Height (m)	Variance Approx (m)	Variance (%)	Building A	28m	18.58m	-9.42m	-33.6%	Building B	28m	48.88m	+20.88m	+74.5%	Building C	28m	31.90m	+3.90m	+13.9%	Building D	28m	32.12m	+4.12m	+14.7%	Building E	28m	30.13m	+2.13m	+7.6%	Stage 1A DA Design Report pg.12, 23 Due to the sloping terrain, buildings contain few sleeve apartments on lower ground levels which can be read as a storey higher at the boundaries. These buildings, however, are largely perceived as the storeys nominate in the diagram. Overshadowing comparison diagram between RTS1 & RTS2 ADDITIONAL OVERSHADOWING 1PM - 3PM [JUNE 21]  * Percentage of overshadowing caused by current proposal restricted to comparing the approximated areas of overall overshadowing with approximated compliant shadow areas. * Overshadowing percentage is an approximated average.
Building	DA (July 2021) (Building parapet or roof RL excl over-run)	RTS1 (Mar 2022) (Building parapet or roof RL excl over-run)	RTS2 (Dec 2022) (Building parapet or roof RL excl over-run)	RTS3 (June 2023) (Building parapet or roof RL excl over-run)																																																										
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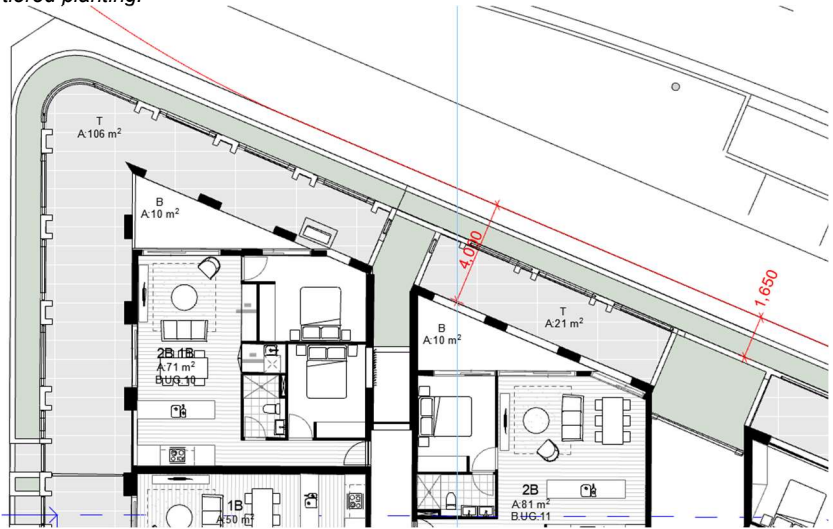
Council Comments (February 2023)	FPA Response	Reference Drawings
	- improved quantity of usable public open space capable of achieving more than 2 hours of direct solar access on 21 June; - improved retention of native vegetation and important tree groupings, ensuring protection of Telopea's existing quality and character; - improved or maintained levels of visual impact when viewed from the surrounding locality. For clarity, the proposed building height increases proposed between RTS 1 and RT2 were limited to one building (Building B) and equated to 2.2m only. The increase in height is the direct result of an increased setback to Sturt Street in response to DPE feedback encouraging greater pedestrian amenity. An additional dark recessed upper level was subsequently added to maintain the GFA compliant scheme and yield envisioned within this precinct. Furthermore: - The additional recessed upper level was added to Building B to reinforce the master-planning principles of scale transition towards the High-Rise Core Precinct. - The addition to Building B is also the most sensible as its position away from the low-rise context towards the south and east minimises its overall impact, potential overshadowing impacts and maintains the Concept Plan footprint scale and public domain. - The recessive dark toned level contrasts the lighter toned tower and is thus visually minimal and sympathetic to the existing context as seen in the renders. - Overshadowing is minimal, and is only noticeable during 3pm June 21, with an approximate 3% increase in overshadowing from RTS1. RTS 3 demonstrates that this increase in height does materially impact on bulk and scale, shadowing, wind or visual impacts.	
Stage 1A DA shows 3.1m floor to floor heights in the schedule and elevations, despite mentioning NCC requirement of 3150mm in Clause 4.6. Further clarification is required as what the floor-to-floor heights are within Stage 1A.	The Stage 1A Project Application has adopted a 3.1m floor to floor height. The Clause 4.6 Variation to Height has been amended to reflect the adopted floor to floor height.	- PLA-AR-DA0201 - PLA-AR-DA0208 BLDG ELEVATIONS - PLA-AR-DA0250 - PLA-AR-DA0254 OVERALL SECTIONS - PLA-AR-DA0271 - PLA-AR-DA0277 OVERALL ELEVATIONS
The Design Report and Clause 4.6 must include lower ground and upper ground levels when discussing the overall height of Buildings (for example, Building E is 9 storeys when including the lower and upper ground levels.) The Urban Design (Section 4) and Public Domain (Section 5) of this attachment provides further design assessment of Stage 1A.	The Stage 1A Urban Design Report and Clause 4.6 Stage 1A Building Height Variation Request have both been updated to adopt the PLEP 2011 definition of storey and basement, each of which is reproduced below for avoidance of doubt: storey is a space within a building that is situated between one floor level and the floor level next above, or if there is no floor above, the ceiling or roof above, but does not include— (a) a space that contains only a lift shaft, stairway or meter room, or (b) a mezzanine, or (c) an attic. basement means the space of a building where the floor level of that space is predominantly below ground level (existing) and where the floor level of the storey immediately above is less than 1 metre above ground level (existing).	- Stage 1A DA Design Report pg.18, 20, 23, 25 - Clause 4.6
The RE1 Public Recreation zoned land does not have an allocated FSR under the Parramatta LEP 2011, therefore should not be included in the site area calculation for Stage 1A. The permissible FSR for the site is 1.7:1 + 0.2:1 (1.9:1) allowable under the SEPP. It is Council estimate that approximately 34,618sqm GAF is allowable. The current scheme is approximately 2,478sqm or 0.136 FSR over the permissible FSR. A Clause 4.6 variation to the FSR development standard is required to be submitted.	The RE1 Public Recreation zoned land does not form part of the Stage 1A Project Application site area. The Stage 1A Project Application site area is limited to the land zoned R4 High Density Residential and subject to a base Floor Space Ratio (FSR) of 1.7:1. Based on a site area of 18,150sqm, the maximum permissible gross floor area is 30,855sqm. Clause 6(2) of the Affordable Rental Housing SEPP provides that <i>residential development is taken to be for the purposes of affordable housing if the development is on land owned by the Land and Housing Corporation</i>. The Stage 1A Project Application for residential	- Stage 1A DA Design Report pg.12 - Presentation to Council 4th July

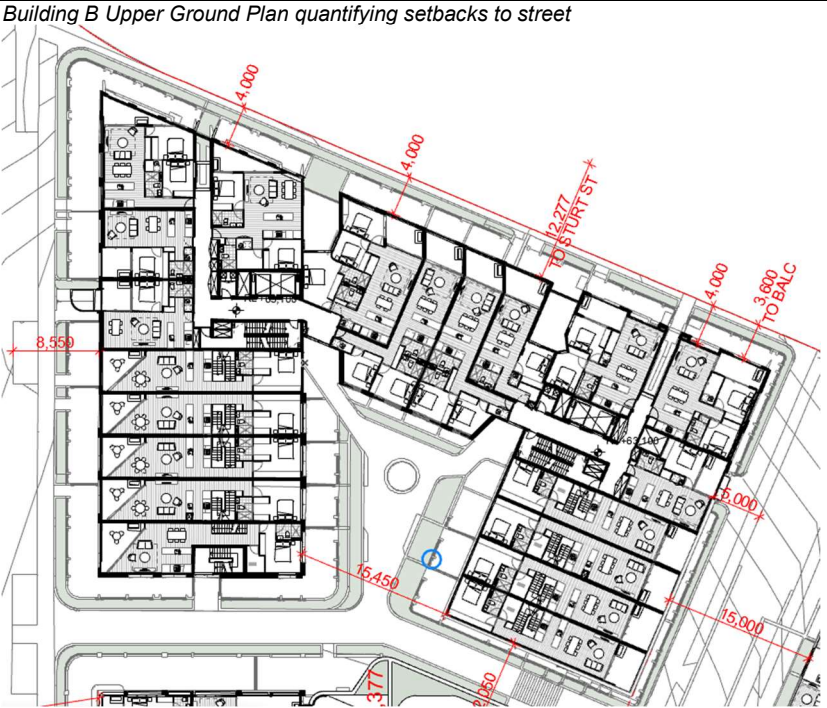
Council Comments (February 2023)	FPA Response	Reference Drawings
	development is accordingly construed to be entirely affordable housing for the purposes of clause 6(2). It is Frasers' view that Council has incorrectly applied a 0.2:1 FSR bonus when the site is legible for a 0.5:1 FSR bonus. Pursuant to clause 13(2)(a) of the Affordable Rental Housing SEPP, an additional 0.5:1 bonus FSR (equating to 9,075sqm of floor space) is available as the existing maximum floor space ratio is less than 2.5:1 and the percentage of the gross floor area of the development that is used for affordable housing is more than 50 per cent by virtue of clause 6(2) defining residential development on LAHC owned land as affordable housing. The combined base and bonus FSRs of 1.7:1 + 0.5:1 equate to a maximum FSR of 2:2:1, or maximum permissible floor space 39,930sqm. The proposed GFA of 37,130sqm is compliant with the applicable FSR controls. Accordingly, a clause 4.6 variation request is not required	
In accordance with Clause 6.12(3) and 6.12(4) of Parramatta LEP 2011, Council must be satisfied that Design Excellence is achieved for the proposal prior to granting a waiver. Council has reviewed the design amendments for Stage as part of the response to submission package to ensure that Frasers and LAHC have adequately addressed Council's concerns. Council Officers conclude that a waiver should not be granted at this time as the matters raised by Council have not been adequately addressed.	FPA reiterates that it is seeking Council waive the requirement for a design competition for Stage 1A pursuant to clause 6.12(5) of the PLEP 2011 and is also seeking an alternative design excellence process for the broader Telopea Concept Plan Area. This feedback register supports a package of documentation that FPA has prepared to support Council's review of the Stage 1A Project Application and Council's consideration of the design competition waiver request. The package includes Attachment 4 Design Excellence Compliance Statement which provides a detailed assessment by Urbis of the Stage 1A Project Application design scheme against Clause 6.12(4) of the PLEP 2011. This feedback register and Attachment 4 Design Excellence Compliance Statement collectively address Council's feedback with the objectives of demonstrating that the design rationale is capable of exhibiting design excellence and contributing to the natural, cultural, visual and built character values of the Parramatta LGA.	Refer to complete package and specifically Attachment 4 Design Excellence Compliance Statement.
Based on the amendments to the Stage 1A, it is recommended that the SDRP review the proposal.	The proposal remains generally consistent with the scheme considered by the SDRP in August 2021. Design refinements made since the last SDRP meeting have primarily been made to respond to feedback provided by Council and the Department. Notwithstanding this, it is the Department's jurisdiction to request the SDRP review the Stage 1A Project Application as part of the assessment process. FPA will consider any further SDRP feedback should Department determine to seek the SDRP's review of the application.	N/A for the purposes of the Design Competition Waiver Request
2. State and Local Contributions VPAs		
N/A for the purposes of the Design Competition Waiver Request	N/A for the purposes of the Design Competition Waiver Request	N/A for the purposes of the Design Competition Waiver Request
3. Property and Legal Matters		
N/A for the purposes of the Design Competition Waiver Request	N/A for the purposes of the Design Competition Waiver Request	N/A for the purposes of the Design Competition Waiver Request
4. Urban Design		
Council does not agree to a consent being issued without a VPA. It is in the interest of both parties to resolve the VPA prior to any consent being issued. A substantial number of items are part of the Stage 1A application and are still outstanding in terms of design and approvals from TfNSW. Council notes the importance of a timely resolution of the matter and is committed to working with Frasers and LAHC to endorse a draft Planning Agreement prior to any consent being issued for the SSD.	N/A for the purposes of the Design Competition Waiver Request	N/A for the purposes of the Design Competition Waiver Request
Communal open space must be provided for buildings C7, C8 and Building A (Stage 1A) and identified in plans	Approximately 327sqm of communal open space is allocated to Building A. Building A's site area is 1,092sqm and consequently the proposed communal open space equates to 29%	- Stage 1A DA Design Report pg.12. - PLA-AR-DA0350 DEEP SOIL CALCULATION

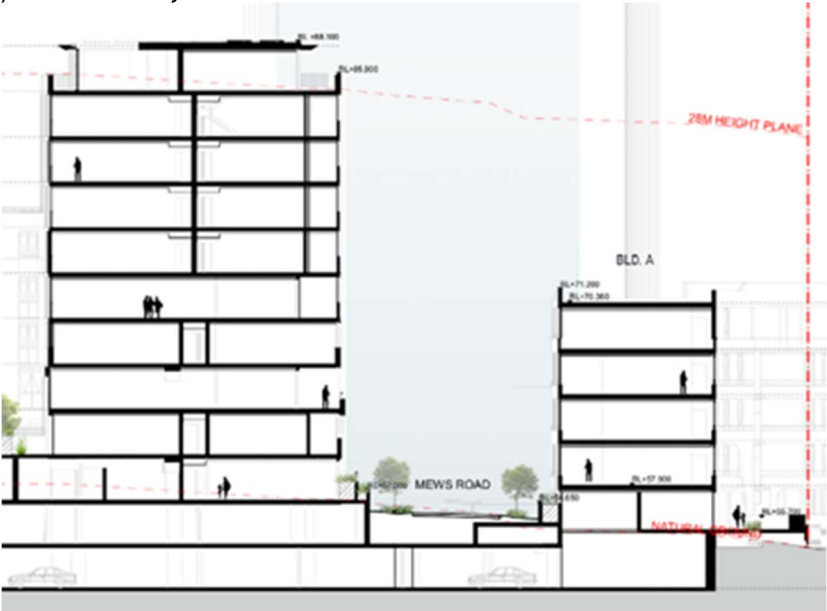
Council Comments (February 2023)	FPA Response	Reference Drawings
	of the 1,092sqm site. The proposed communal open space exceeds the ADG's minimum guidance of providing communal open space that is 25% of the site. Building A's orientation towards Sturt Street and the new internal loop road seek to optimise street frontages, public domain activation and to improve safety and provide passive surveillance. Consequently, the proposed communal open space has been sited to Building A's southern frontage. This design response results in minimal solar access to the communal open space between 9am to 3pm at mid-winter, and consequently the ADG's guidance that developments achieve a minimum of 50% direct sunlight to the principal usable part of the communal open space for a minimum of 2 hours between 9 am and 3 pm on 21 June (midwinter) is not achieved. Despite not achieving the ADG's guiding mid-winter solar access metrics, the location, orientation and solar access provision of Building A's communal open space is considered an acceptable outcome for the following reasons: - the communal open space provides amenity for residents for the remainder of the year, achieving good levels of solar access throughout the remainder of the year; - the communal open space integrates with the broader open space network; including the green east-west oriented corridor within Stage 1A and the future Telopea Light Rail Plaza; and - Building A will also benefit from close proximity to the 3,536sqm of public open space to the east, which provides a variety of active spaces, gardens and shelters to support the community all while achieving 2 hours of solar access between 9am to 3pm at mid-winter to 100% of the open space. More broadly, the ADG indicates that communal open space is an important environmental resource that provides outdoor recreation opportunities for residents, valuable 'breathing space' between apartment buildings and provides important functional and amenity attributes such as opportunities for group and individual recreation and activities and social interaction. While the Building A communal open space will not achieve the recommended 50% solar access provision during mid-winter, it is important to highlight the 3,536sqm of publicly accessible open space will achieve 100% solar access during mid-winter. Realistically, Building A residents may elect to use the public open space as an alternative communal area for the short durations of the year when the Building A communal open space is in shade. The pursuit of strict compliance with the communal area requirements cannot ignore the proximity to such a large open space within 5 minutes walking distance of all Stage 1A buildings.	- Telopea Urban Renewal Stage 1A-2 Residential Landscape Works Development Application pg.7 - Hassell/Bates Smart Telopea Urban Renewal Public Domain Plan pg.42 
The connection of carparking basement between Building C and D is not supported and should be redesigned as two separate structures on site. The driveway access point from the south of Building D and C is sufficient to allow for vehicle movement into the carparks below these buildings and therefore the basement connection cannot be justified. The extent of basement decreases deep soil for the south of the Neighbourhood Park and the avenue of trees aligned to Mews Street. By reducing deep soil, it reduces the growth of mature canopy sizes which impacts heat island effect. Deleting the basement means that the whole of the link from Manson Street can remain public. This is recommended. Council will not accept any land dedication above basement levels. If the connection of carparking basement between Building C and D remains, the provision of sufficient soil depth to support planting over the basement link between buildings must be clearly demonstrated. The drawings also show no tree	The connecting car park basement between Bld C & D is proposed to: - enable a consolidated loading dock to be provided, which will be accessed through Building C; - avoid generating additional vehicular congestion and compromised pedestrian at ground level that would inevitably arise from providing separate basements - achieve greater efficiency through the consolidation of required ramping infrastructure; and - reduce the level of excavation that would otherwise be required if separate basement structures were required to be constructed to support individual buildings. - Removal of Winter Street basement access, in consultation with the community. The proposed connection of the Building B/Building C basement does not compromise deep soil planting across the Stage 1A Project Application site area. The total deep soli area proposed across Stage 1A is 3,550sqm (19.6%) across the R4 High Density Residential zoned land, which significantly exceeds the ADG's recommended minimum guidance of 7%.of the Stage 1A's 18,150sqm site area. In response to Council's soil depth comments, the design team has amended the architecture, landscape architecture and civil drawings with corresponding RL and SSL. The revised drawings indicate that all trees are proposed to have a minimum depth of	- Stage 1A DA Design Report pg.22. - PLA-AR-DA0099 LOWER GROUND FLOOR PLAN - Telopea Urban Renewal Stage 1A-1 Public Domain Landscape Works Development Application - Telopea Urban Renewal Stage 1A-2 Residential Landscape Works Development Application - Hassell/Bates Smart Telopea Urban Renewal Public Domain Plan pg.42 - Hassell Stage 1A Landscape plans

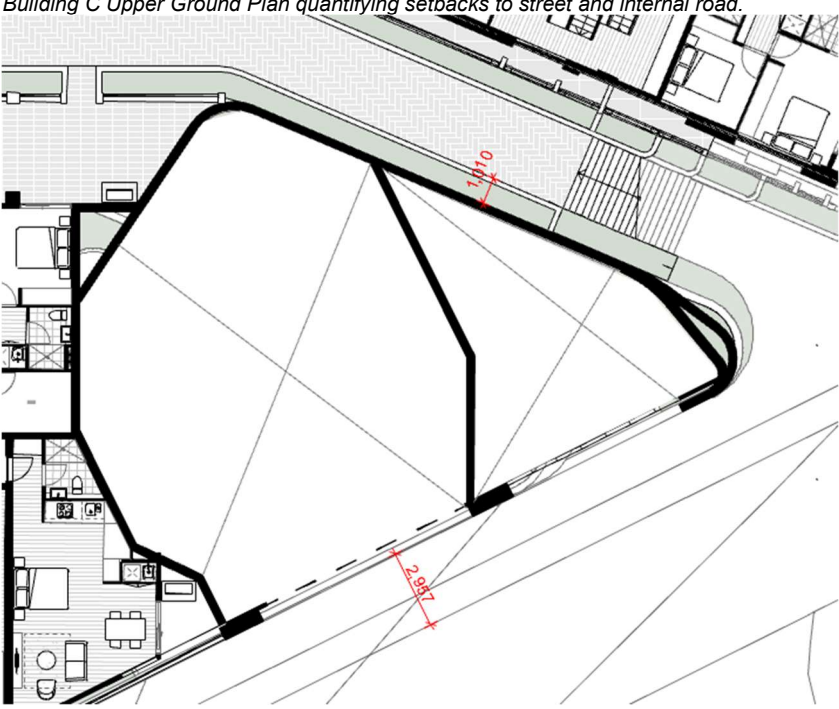
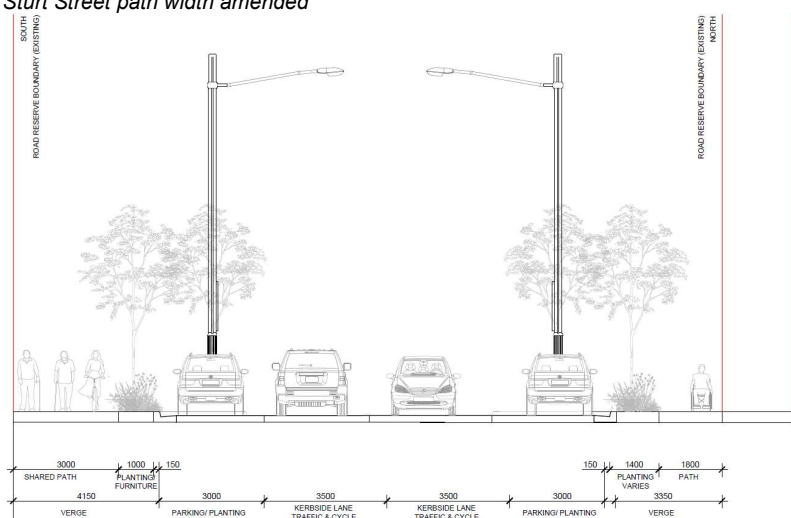
Council Comments (February 2023)	FPA Response	Reference Drawings
vegetation in this area, and such an outcome is not supported by Council officers. Provide enough design detail (specific section relative to ground level) to confirm the following: • Minimum 1m clear soil depth, excluding mulch and drainage layers, over basement carpark deck to support soft landscaping including trees of all sizes. • Large contiguous soil body zones supporting multiple trees and plants. A series of isolated, disparate containerised zones is not acceptable. • A landscape design showing large trees planted over the basement link (if not removed as recommended) to match the rest of the park area. • Basement carparking extent should be reduced particularly from boundaries and sit within building footprints. This is to allow for deep soil tree planting which supports large tree growth. Basement carpark to the Northern boundary of building C should be setback 4m. • A number of the communal open spaces have the basement extending significantly into them. Basement should be reduced to allow for greater planted amenity within the communal open space.	1200mm, allowing for a minimum of 1m soil depth, with 200mm allowance for mulch, drainage layers, etc. The proposed soil volumes will ensure the long-term health of trees, matching the trees in the public domain within deep soil.	Lower Ground Floor  Deep Soil Zones  Deep Soil 3,550 m² 19.6% of Site Area Planting soil depth above basement link

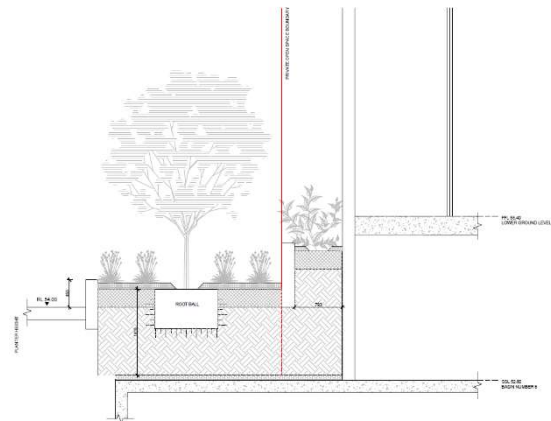
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Ground level front setbacks have been amended and are improved however the following changes are still sought: - Sturt Street – 6m minimum ground level and basement car park setback for Stage 1A. This will improve the deep soil area available for trees, mimic the proposed setback to the Core on the other side of Sturt Street and increase the depth of private balconies or gardens for residents from the street. - An increased setback to Mew Street could improve the pedestrian experience and increase areas for tree planting. - Setbacks along the new internal road for Eastern side of Building C Ground Floor is only 2m with 0.50m of planting. Setback should be increased to allow for privacy and a larger planted outlook. - The Southern side of Building C has a 0m setback to the new internal roadway. Opportunities to increase this setback should be explored	Council's recommendations in respect of Sturt Street, Mew Street, the eastern side of Building C and the southern side of Building C have been considered by the design team as set out below. - Sturt Street Setback - Although Building B is setback 4m from façade to boundary and 3.6m from boundary to balconies, the majority of the Building B setback is 12m, from Sturt Street and therefore exceeds the recommended 6m setback. - Any further increases in setback would create an empty liminal streetscape between the Core Precinct and Stage 1A and reduce traffic and activation. - The proposed setback exceeds ADG separation requirements from the Core Precinct to the north and achieves the required solar amenity within Stage 1A. - The proposed generous street verge is sufficient to accommodate a variety of planting types and scale. - The setback is proposed to include both private and public planting to front the street. - The proposed quantum of deep soil area will support the planting of 29 generous trees within the public domain and pedestrian priority areas. - Generous terracing is provided on the ground level, and has the potential to offer further deep soil planting (above that already proposed) to support shrubbery and trees which will enhance the pedestrian experience mitigate privacy concerns. - A consistent 1.5m planting zone continues along the southern Sturt Street setback. To maximise the amenity planting brings to the streetscape, the landscape is arranged in two tiers, comprising a planting zone at the footpath level and a second higher planter that provides a planted buffer between streetscape and terraces. The proposed layering of planting (native grasses and shrubs) will soften the building edge, provide privacy to residents, and increase sense of separation between terraces and footpath. - In response to Council's comments regarding deep soil and street trees to Sturt Street (24 total), the continuous ground level planting zone has been increased from 500mm to 900mm – ensuring the success of street trees. The adjoining landscape verge within Sturt Street will further support the health of trees. - Mew Street Setback	- Stage 1A DA Design Report pg.20, 22, 57, 62, - PLA-AR-0099 LOWER GROUND FLOOR PLAN & PLA-AR-0100 UPPER GROUND FLOOR PLAN - PLA-AR-0202 BLDG. B NORTH ELEVATION - PLA-AR-0350 DEEP SOIL CALCULATIONS Hassell/Bates Smart Telopea Urban Renewal Public Domain Plan pg. 42 - Telopea Urban Renewal Stage 1A-2 Residential Landscape Works Development Application - Stage 1A DA Design Report pg. 63 - PLA-AR-0100 UPPER GROUND FLOOR PLAN - PLA-AR-0204 BLDG. B EAST & WEST ELEVATION - Telopea Urban Renewal Stage 1A-2 Residential Landscape Works Development Application - Stage 1A DA Design Report pg. 62, - PLA-AR-0100 UPPER GROUND FLOOR PLAN - PLA-AR-0204 BLDG. B EAST & WEST ELEVATION - Telopea Urban Renewal Stage 1A-2 Residential Landscape Works Development Application - PLA-AR-0099 LOWER GROUND FLOOR PLAN - PLA-AR-0206 BLDG. C ELEVATION Telopea Urban Renewal Stage 1A-2 Residential Landscape Works Development Application

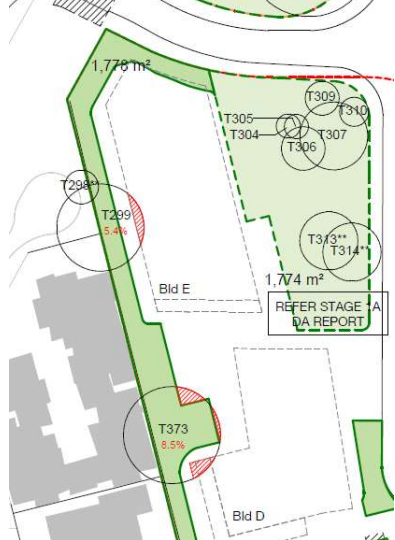
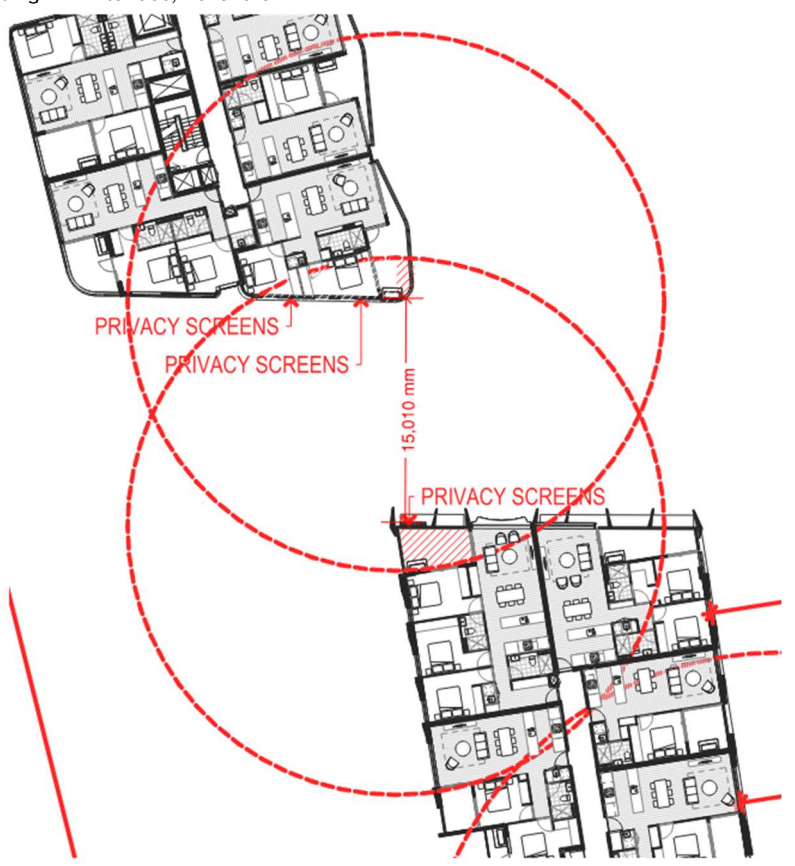
Council Comments (February 2023)	FPA Response	Reference Drawings
	○ The proposed 5m setback to Mew Street from Buildings A and B (from glass line) is unable to be increased because it would erode the intimate streetscape envisioned in the masterplan and generate a higher, more uncomfortable level difference between footpaths and street (refer to section). ○ The setback of 5m is considered sufficient as Mews Street is a private internal street which is proposed to accommodate residential traffic compared to Sturt Street where larger planting would be promoted to create a buffer to heavy traffic. ○ The Mew Street setback has accordingly been designed to respond to these constraints and to achieve ADG building separation at the ground plane. ○ The setback is located on sloping terrain. Terraced planters, including trees and shrubbery, are proposed to ensure good levels of amenity are provided to pedestrians in the public domain while also ensuring appropriate levels of screening are provided to internal residential areas. ○ Fencing and raised planters proposed at the front boundary of the ground level terraces further enhance privacy and amenity for pedestrians on street level. ○ In addition, the proposed lush public domain further west of Mew Street further enhances this street condition. ○ The proposed landscape response demonstrably accommodates sufficient tree planting and achieves Council’s expectations for an improved pedestrian experience. ○ The proposed 9m setback to Mew Street from Buildings B and C (from glass line) is unable to be increased as it would erode the intimate streetscape with the generous public park. The separation is considered generous enough for a mix of planting options. ○ The Mews Street northern and eastern footpaths have been designed in accordance with Council’s Public Domain Guidelines with 1.8m footpaths and a continuous landscaped verge providing tree and groundcover planting (ranging from 1m to 2.5m wide). ○ Proposed 1m northern and eastern Mews verges are complimented by wider verges to southern and eastern carriageway verges. ○ Footpath widths are scaled for the anticipated resident and visitor patron volumes. The larger through-site link connection caters for higher volumes of precinct traffic. ● Setback to eastern side of Building C ○ The proposed setback of 1m is unable to be increased as it would create a wider separation that would erode the intimate pedestrian through-site link. This link runs for 20m (inclusive of stairs) and directly links to the public open space. ○ Podiums range between 1-4 stories and provide a dynamic and comfortable human scale pedestrian experience. ○ ADG separation at this interface has been achieved without any privacy impacts being created. ○ In response to the eastern façade’s location on sloping land, raised planting of shrubbery trees and fencing has been determined to be the most appropriate landscaping design response. ○ The eastern verge adjoining Building C is 2.8m wide, with a 1.8m footpath and 1m planting zone. ● Southern side of Building C ○ Building C has a 3m southern setback to the street as a direct response to services/ utilities planning, which should ideally be positioned away from the activated zones of the public domain.	<i>Building B North Elevation illustrating adequate landscaping</i>  <i>Building B Plan, façade facing Sturt Street illustrating approximately 1.65m deep zone for tiered planting.</i> 

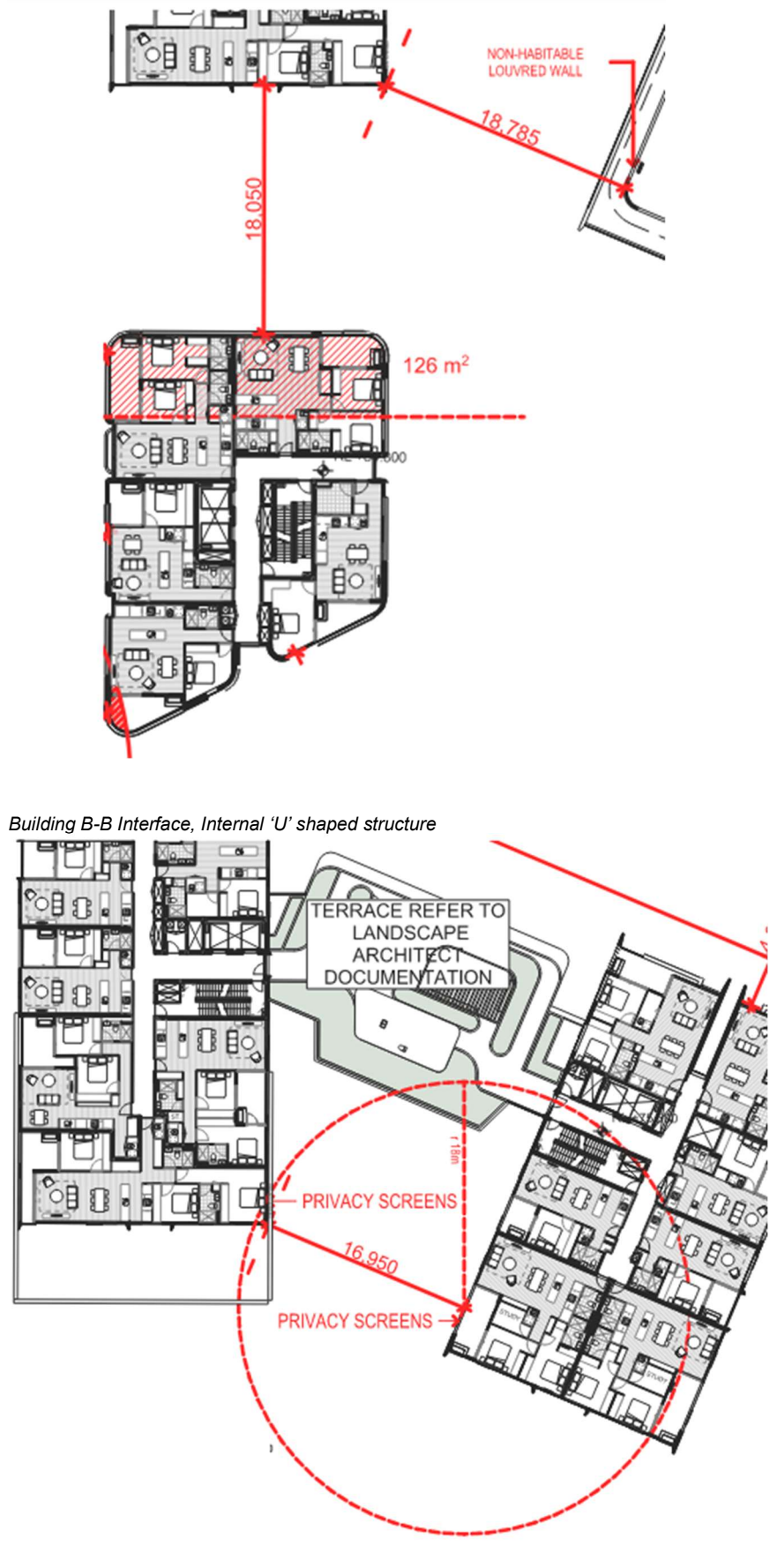
Council Comments (February 2023)	FPA Response	Reference Drawings
	○ The 3m setback to street is also considered an appropriate outcome on the basis that: ▪ there are no ground level apartments and accordingly there are limited privacy concerns from the public domain in this part of the Stage 1A Project Application site; and ▪ the internal road is intended to predominantly function as a vehicular access and is not anticipated to be a primary pedestrian route. ○ Increasing Building C’s southern setback would reduce the width of the pedestrian link between Building B and Building C, comprising the amenity of that space and reducing building separation distances which is not supported. ○ Noting that Building C’s lobby is located on the eastern façade fronting its primary public domain, pedestrians are not anticipated to frequently traverse this part of the site. ○ It is also highlighted that Building A residents are expected to use the direct internal link through Building B and Building C to access public domain, Telopea light rail plaza, the Core Precinct and other parts of the Precinct. ○ The landscape design proposed planting between the building and internal road to accentuate visual amenity. ○ ADG separation distances are exceeded at this location.	Building B Upper Ground Plan quantifying setbacks to street  Building B indicative render illustrating potential landscaping and residential amenity. 

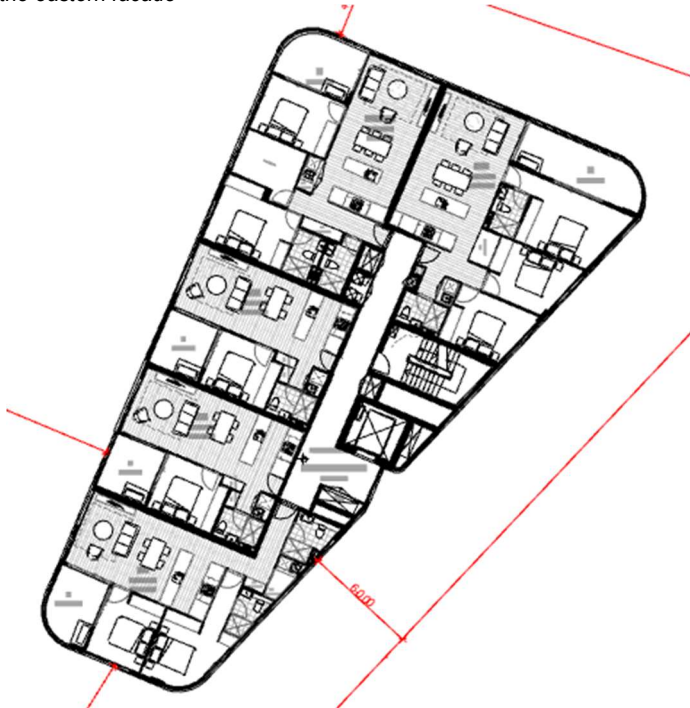
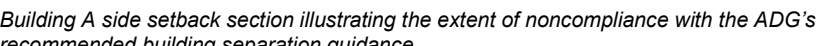
Council Comments (February 2023)	FPA Response	Reference Drawings
		Hassell Street Section through building A & B illustrating adequate great planting and pedestrian amenity within Mews Street.  Building C indicative render illustrating potential landscaping and residential amenity along southern street and internal road. 

Council Comments (February 2023)	FPA Response	Reference Drawings
		Building C Upper Ground Plan quantifying setbacks to street and internal road. 
Not addressed for Sturt Street. Ref Appendices L and K. Sturt Street cycle path – Council seeks a 3.0m shared path on the south side of Sturt Street. All drawing sets should be amended accordingly. Note that Appendix K incorrectly shows a 2.5m path. This is not an acceptable outcome. Sturt Street pedestrian path – a 2.3m path is shown. Please amend to 1.8m.	In response to Council's feedback: - the footpath to the south verge of Sturt Street has been increased from 1.8m to 3m; and - the footpath to the north verge of Sturt Street has been decreased from 2.3m to 1.8.	Hassell Stage 1A Public Domain Landscape Works Sturt Street path width amended 
Reference: Appendix H Design drawings still show conflict between basement alignments and existing trees to be retained. This will be exacerbated by construction zones. Council reiterates that basement encroachment into the TPZ of existing trees to be retained must be eliminated. For any DA approval (e.g., Stage 1A) the following DA Conditions are required: - Written confirmation from a Project Arborist to confirm the viability of the trees long term. - Specific remedial actions that will be taken to ensure suitable air porosity to existing tree soil areas is guaranteed	Architecture, Landscape Architectural and civil drawings have been coordinated with the Project Arborist to minimise impacts to all existing trees to be retained, with no basement impacts greater than 4% to the TPZ. Trees impacted by basements extents are illustrated (PLA-AR-DA0097 and PLA-AR-DA0098) and have been reviewed as suitable for retention by the Project Arborist. Trees impacted include 299 & 373. Proposed Landscape and Civil works tie into existing levels around trees to be retained, minimising disturbance to trees. LAHC (as the proponent) confirms it would accept a suitably worded condition requiring written confirmation from an arborist to validate the long term viability of trees and the	- Hassell Stage 1A Landscape Plans - JWP Stage 1A Civil Plans - Naturally Trees Arborist Report - PLUS Stage 1A Architectural Plans

Council Comments (February 2023)	FPA Response	Reference Drawings
	remedial actions required (if any) to be implemented to ensure suitable air porosity of soil areas will be guaranteed.	
Plans should indicate that the basements must be set down so that trees can be planted at ground level in large contiguous planters with no lightweight soils. Site and building sections should be provided clearly showing the extent and depth of basement parking under, in particular Mews Street.	In response to Council's feedback, basement and subsurface basins have been illustrated on plans with corresponding RL and SSL – these indicate that all trees have a minimum depth of 1200mm, allowing for a minimum of 1m soil depth and 200mm for mulch, drainage layers etc.	- HSL_S1A-2_L_1103 – 1104 for plans with extents of basements illustrated on General Arrangement Plans with FFL, RLs and SSL. - HSL_S1A-2_L_3012 Section Interface' for sections through landscape zones, private open spaces and basement, basin extents. - PLUS Telopea Design Report Rev J Page 43 Section C
In order for the proposed avenue of trees wrapping around Mews Street (which will create ample canopy cover and privacy for residents for this environment) to be realised, the current basement and Civil basin positions must be reconsidered. The basement connection between Building A and B should be removed or have a sufficient slab set down to allow for a 1.8m depth of soil below grade to ensure trees can grow with adequate soil volume to support a large mature tree	The proposed basement connection between Buildings A and B is at SSL 53.90, while the Mews level grades range from RL 55.50 – RL 56.00. This design provides trees with a connected volume of soil ranging from 1.6m – 2.1m in depth.	- HSL_S1A-2_L_1103 – 1104 for plans with extents of basements illustrated on General Arrangement Plans with FFL, RLs and SSL. - JWP Stage 1A Civil Plans 110500-04-DA1010 13
Reference: Appendices J & L Council's concern was the apparent conflict between proposed Mews Street trees and an underground retention basin/OSD basin at location of Basin 4. The applicant has not addressed this concern nor have they addressed the basement set down requirement.	Basin 4 has been reconfigured to ensure it is completely located beneath the Mews Street road reserve to facilitate tree planting along the street verge.	- HSL_S1A-2_L_1103 – 1104 for plans with extents of basements illustrated on General Arrangement Plans with FFL, RLs and SSL. - JWP Stage 1A Civil Plans 110500-04-DA1010 13
The applicant provide updated drawings to relocate or reconfigure the OSD tank, so it does not jeopardise the ability to achieve the proposed landscape (tree planting) design. The current location of the OSD tank conflicts with other delivery commitments of street trees in Mews Street. It will not be suitable to have these trees planted in planter boxes at the side of the (narrow) road.	In response to Council's feedback, Basin 6 SSL has been dropped to increase the depth to trees. The proposal provides 1.4m total depth, 1.2m for soil and 200mm mulch and drainage layers. Basin 4 has been positioned to sit wholly within the carriageway, thereby not impacting tree or groundcover planting.	HSL_S1A-2_L_1103 and HSL_S1A-2_L_3012 showing interface and soil zone above Basin 6. 
The building be realigned so the existing trees can be retained in the southwest of the site. The Basement and building encroachment is more than the 10% allowable into the TPZ and sits within the SRZ of existing trees Similarly, the tree next to the end of Winter Street is also impacted by the proposed building.	In response to the increased building setback within Stage 1A, buildings do not encroach more than 10% of the TPZ of the Southwestern trees, specifically T299 & T373.	- PLA-AR-DA0097, PLA-AR-DA0099, - PLA-AR-DA0097 BASEMENT 02 PLAN - PLA-AR-DA0099 LOWER GROUND FLOOR PLAN, - Hassell/Bates Smart Telopea Urban Renewal Public Domain Plan pg. 39 - Telopea Stage 1 Arborist Report

Council Comments (February 2023)	FPA Response	Reference Drawings
		
There are non-compliances with building separation as per the ADG which must be followed to achieve solar amenity and privacy to adjacent residential development. The following separation is required: - The building separation between Building D and E should be increased from Level 5 and above to a minimum 18m (currently 15.2m) (habitable balcony to habitable balcony). - The building separation between Building B and C should be increased from Level 8 and above to a minimum 24m (currently 18.05m) (habitable room to habitable room). - Greater separation is needed for the habitable rooms looking onto the internal courtyard of Building B for privacy measures (for example, on Level 4 the separation between some of these apartments is only 5m between habitable rooms. This must be increased to 6m). - Building A requires a 9m setback to the eastern boundary in areas with habitable rooms from Level 5 and above. - The setback of Building C to the southern boundary must be increased from 11.4m to 12m - The architectural recesses on the following buildings must be amended to a minimum 3m x 3m: Buildings B, C, D and E.	Council's feedback in relation to ADG building separations has been considered by the design team as set out below. The following response should be read in conjunction with the Stage 1A Design Report (Rev J, 23.07.28) and Response to Submissions Report. Building D-E - Building D and Building E are offset to maximise visual amenity and views for residents of apartments. - Levels 5 to 8 achieve a 15.01 metre separation between two balconies, resulting in a non-compliance of less than 3m with the ADG criteria for building separation which equates to 12sqm of floor space or approximately 1% of each affected level's GFA (12/904sqm) or 0.6% of the total building GFA (48/7840sqm). - Full height privacy screens are proposed on both buildings to mitigate visual privacy impacts. The apartments on the south east corner of Building E are also oriented east to avoid direct view lines to apartments on the north west corner of Building D which are oriented north. - Visibility between apartments is limited at Level 5 and above and direct lines of sight are oriented towards the public domain. - The design also seeks articulate a vertical façade line expression as to omit from the ziggurat expression that would result if the ADG building separation guidance was adopted. - Other options investigated to reduce the non-compliance included removal of the Building D balconies. However, this was not considered an acceptable outcome as it would compromise apartment amenity, compliance with the ADG's balcony guidance and reduce the ability for passive surveillance of public open space from Building D. - Good solar amenity to the apartments and communal open space is achieved. Building B-C - Building separation is consistent with the ADG design criteria for building separation between Levels 1 to 8. - Level 9 of Building C results in a non-compliance with the suggested 24m building separation distance design criteria for habitable-to-habitable rooms. This equates to 91sqm of floor space or approximately 25% of that level's GFA (91/362sqm) or 2% of the whole building's GFA (91/3969sqm). - To mitigate any impacts on visual privacy for apartment occupants, privacy screens have been introduced to the bedrooms of Building B which face Building C. Windows have also been placed to minimise overlooking and direct lines of sight while maximising solar access to private open space and living rooms.	- ADG Compliance Schedule 7-10, - Stage 1A DA Design Report pg.75 – 76, PLA-AR-DA0 - PLA-AR-DA0300, PLA-AR-DA0301 SOLAR ACCESS DIAGRAMS – WINTER SOLSTICE - PLA-AR-DA310 SUN-EYE VIEW DIAGRAMS – WINTER SOLSTICE- PLA-AR-DA329 SOLAR AMENITY DIAGRAMS <i>Building D-E Interface, Level 5-8</i>  <i>Building B-C Interface, Level 9 only</i>

Council Comments (February 2023)	FPA Response	Reference Drawings
	- Visual amenity of the primary habitable spaces are still maintained as primary glass line faces away from one another. Privacy screens are also provided on both facades of Building B and Building C, with the opportunity to further increase their extent through the detailed design process if privacy concerns require further mitigation. - Options investigated by the project team to achieve compliance included removal of non-compliant floor space which would result in a stepped ziggurat form and would reduce the number of solar panels and mechanical plant which is currently provided on the rooftop. Shifting Building C further south was also discounted as Building C is located on the southern boundary of Stage 1 adjacent to the key driveway entrance for basement parking. As such, the building cannot be moved further south without impacting on the current road layout, and proposed access and basement layout without incurring considerable redesign. It is also likely to compromise and reduce the proposed quantum of associated tree planting. - Building B-B (Internal) - The 'U' shaped structure of Building B has two wings, which are aligned with and address street frontages to the east and west. These building wings are slightly offset and intentionally do not have an orthogonal alignment, to assist in avoiding direct overlooking between apartments. - Levels 5 to 8 achieve a minor non-compliance of 1.05 metres, which equates to 1sqm per floor. - The layout of all impacted apartments has been optimised to achieve adequate solar access and natural ventilation to be consistent with the relevant ADG design criteria. - The eight balconies (B.05.02, B.05.13, B.06.02, B.06.13, B.07.02, B.07.13, B.08.02 and B.06.13) where strict compliance is not achieved are located on the building corners and have two aspects providing alternative outlook for apartment occupants. This minor non-compliance is mitigated with privacy screens and facade elements on both wings of the building. - Potential options investigated by the project team to achieve compliance included removal of the eight non-compliant balconies. Removal of the 8sqm of non-compliant floor space would result in the relocation of balconies which would likely require the two bedroom apartments to be redesigned as one bedroom apartments. - Within Building B, there are 54 one bedroom apartments, 98 two bedroom apartments and 21 three bedroom apartments. Redesign would not only remove the amount of two bedroom apartments, noting there is a growing demand for larger housing options in the apartment market, it would also impact the ability to achieve solar access and natural ventilation for the apartments by requiring redesign. - Requiring compliance with the 18 metre building separation would impact the usability of balconies without providing a significant improvement in the amenity of the apartments. - Building A Separation to Eastern Boundary - Building A's design seeks to maintain a vertical tower expression to support a gentle transition from lower density to higher density. - Non-compliance occurs on the habitable space of Level 01 only (storey 6), resulting in a minor compliance of 7% (29/525sqm of the total level's GFA). - Building A minimises privacy concerns through the careful planning of unhabitable and habitable space. Unhabitable spaces are generally located on the eastern boundary to reduce privacy concerns. Primary habitable spaces (living rooms) achieve privacy and amenity. - Compliance with the ADG building separation guidance would result in an undesirable ziggurat form.	 The reference drawings consist of two architectural floor plans. The top drawing shows a building layout with a red dashed line indicating a separation of 18.050. A red arrow points to a 'NON-HABITABLE LOUVRED WALL' with a dimension of 18.785. A red dashed line also indicates a separation of 126 m². The bottom drawing shows a 'Building B-B Interface, Internal 'U' shaped structure' with a red dashed line indicating a separation of 16.950. A red arrow points to 'PRIVACY SCREENS' and another red arrow points to 'PRIVACY SCREENS' with a dimension of 16.950. A red dashed line also indicates a separation of 16.950. A red arrow points to a 'TERRACE REFER TO LANDSCAPE ARCHITECT DOCUMENTATION'.

Council Comments (February 2023)	FPA Response	Reference Drawings
	- Non-compliance with the building separation guidance poses minimal additional overshadowing between the hours of 9-3pm on existing eastern context. Due to the scale of the existing context (2-3 stories) and existing trees, privacy concerns from neighbours are reduced. - Building C Separation to Southern Boundary - The Building C design seeks to maintain a vertical tower expression throughout this facade. To achieve this, Levels 1 – 8 have been setback significantly greater than the recommended ADG separations of 6m (storeys 1-4) and 9m (storeys 5-8) respectively. - The non-compliance of approximately 0.5m equates to 3sqm or approximately 0.8% of that level's GFA (3/362sqm) on floor plates Levels 7 and 8 (storey 9 and 10). - The non-compliance is considered acceptable on the upper two storeys as the overall design outcome offer better amenity and avoids a ziggurat form. - Due to the scale of the existing context (2-3 stories), privacy concerns from neighbours are generally minimal. - Architectural recesses on buildings B, C, D, E - The recesses are proposed to break down the perceived building length and scale. - Most recesses comply with Council's suggestion of 3m x 3m. Of those that may not comply strictly; they functionally serve its purpose to break down scale and street frontages. This with help from a change to a darker material palette in the recess accentuating the perceived breaks. - The proposed recesses do not pose any issues in terms of privacy. For example, walls which bound these recesses are parallel or perpendicular to each other, and generally have at least one blank wall (but in some cases are all blank), thereby limiting windows or the propensity for privacy concerns to be breached. - The Building B façade is articulated with blade walls and balcony notches along with recess to help break down building scale and accentuate the gradual transition in scale, mirroring the Core Precinct. - The recesses do not directly aid the achievement of solar access, and accordingly increasing their size will not improve solar access (typically due to lack of windows within the recesses). - The proposed recesses exceed ADG recommendations which encourage a ratio of 1:3 or 1:2	<i>Indicative render of Building A and Building B from Sturt Street illustrating the clear and gentle transition in scale</i>  <i>Building A typical floor plan illustrating that uninhabitable spaces are largely positioned along the eastern facade</i>  <i>Building A side setback section illustrating the extent of noncompliance with the ADG's recommended building separation guidance.</i> 

Council Comments (February 2023)	FPA Response	Reference Drawings
		BLDG-A EXISTING CONTEXT 6 5 4 3 2 1 6m 0.66m 2 1 BLDG-C EXISTING CONTEXT 10 9 8 7 6 5 4 3 2 1 0.5m 11.5m 11.45m 1.69m <i>Building C illustrating rear setback to existing adjoining context</i> BLDG-A EXISTING CONTEXT 6 5 4 3 2 1 6m 0.66m 2 1 BLDG-C EXISTING CONTEXT 10 9 8 7 6 5 4 3 2 1 0.5m 11.5m 11.45m 1.69m <i>Building C illustrating rear setback to existing adjoining context</i> BLDG-A EXISTING CONTEXT 6 5 4 3 2 1 6m 0.66m 2 1 BLDG-C EXISTING CONTEXT 10 9 8 7 6 5 4 3 2 1 0.5m 11.5m 11.45m 1.69m <i>Building C illustrating rear setback to existing adjoining context</i> BLDG-A EXISTING CONTEXT 6 5 4 3 2 1 6m 0.66m 2 1 BLDG-C EXISTING CONTEXT 10 9 8 7 6 5 4 3 2 1 0.5m 11.5m 11.45m 1.69m <i>Building C illustrating rear setback to existing adjoining context</i>

Council Comments (February 2023)	FPA Response	Reference Drawings
		Building B Tower 1 recess and indicative render  Building C southern recess illustrating blank wall condition, and how the change in materiality helps break down perceived building length, bulk and scale.

Council Comments (February 2023)	FPA Response	Reference Drawings
		 <i>Bldg. D</i> <i>Building D southern recess typical plan and elevation. Indent does not serve to enhance amenity, but to articulate façade expression and reduce scale and length.</i>

Council Comments (February 2023)	FPA Response	Reference Drawings
		 <i>Building D typical recess on plan and elevation. The recess does not serve to enhance amenity, but to articulate façade expression and reduce scale and length with help from</i>

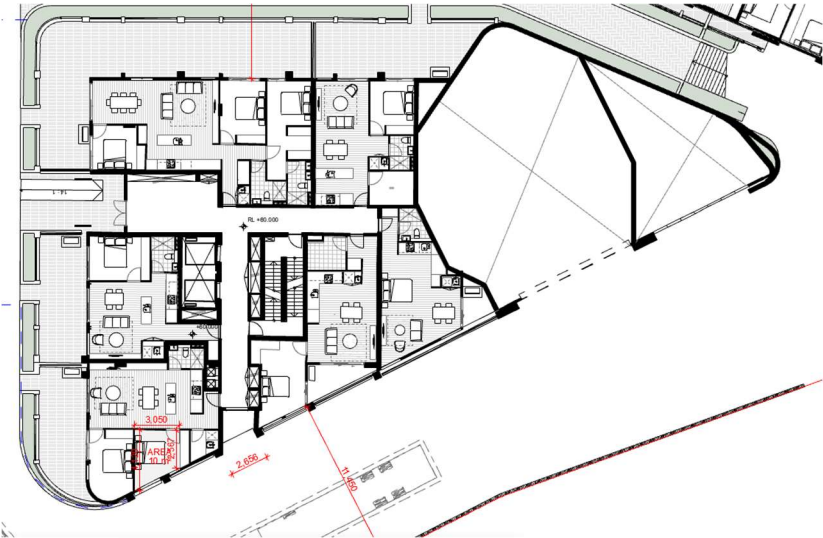
Council Comments (February 2023)	FPA Response	Reference Drawings
		overall façade expression.  The reference drawings include two architectural floor plans at the top, showing the layout of the building's interior spaces. Below these is a 3D architectural rendering of a multi-story building facade. The facade features a mix of dark and light panels, with a central section labeled 'LV2'. The building is set against a clear blue sky, and some landscaping is visible at the base.
The extent of soft landscape area is supported however the proposed large extent of shrub planting in parks and Sturt Street is not acceptable to Council due to future management, maintenance, and operational implications. Please amend the landscape design to provide the following: • Reduced shrub planting and increased lawn areas in park areas to be dedicated to Council. Max. area of shrub planting 35%. • Reduced shrub planting and increase lawn area in Sturt Street footways. Max. area of shrub planting areas approx. 20%.	<u>Neighbourhood Park planting</u> In response to Council comments, within the CoP dedicated Neighbourhood Park, turf has been increased in areas where climatic conditions are suitable. Turf has been expanded into areas that receive the required sunlight to support plant growth, excluding areas under existing tree canopy with deep shade. The total area of lawn is 25% of the park area. In line with Council requirements, 30% of the park is low-maintenance native grasses. Low-maintenance native grasses are proposed along the edges of the park for child safety, acting as a natural buffer limiting access from the central active park uses and adjoining roads. Low-maintenance native grasses are proposed along the edges of the park for child safety, acting as a natural buffer limiting access from the central active park uses and adjoining roads. <u>Station Plaza planting</u>	• Telopea Urban Renewal Stage 1A-1 Public Domain Landscape Works Development Application • Telopea Urban Renewal Stage 1A-2 Residential Landscape Works Development Application • Hassell/Bates Smart Telopea Urban Renewal Public Domain Plan

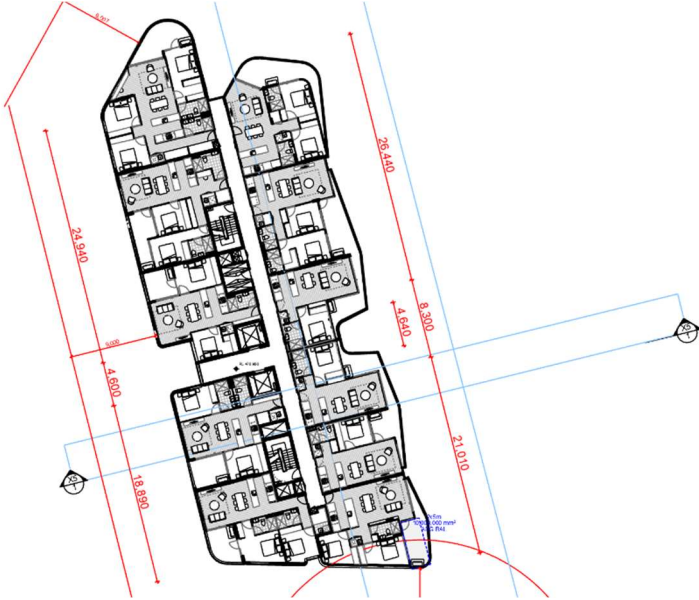
Council Comments (February 2023)	FPA Response	Reference Drawings
	In response to Council comments, the areas of turf and planting area has been reviewed. The design complies with Council's requirement providing 19% lawn and 25% groundcover planting. <u>Sturt Street</u> In response to Council comments, no shrub planting is proposed along streetscapes. Native grasses are proposed along Sturt Street footways as a climate resilient landscape solution, specifically: • Native grasses require less maintenance than turf as they do not require frequent mowing, edging, fertilising (harmful to hydrological health). • Native grasses are resilient to long periods of drought, which are increasing in frequency with climate change. This reduces reliance on manual watering, and eliminate demands on potable water, as aligned with CoP 2017 Environmental Strategy. • Unlike lawn, grassed verges help to mitigate effects of flooding by slowing down and retaining water during flood events. High rainfall events are increasing in frequency, with effects particularly felt on streets with steep slopes – such as Sturt Street. • Grassed verges aid in supporting local biodiversity, an increasing challenge in urban settings. Researchers explain, “insect diversity may be declining even more rapidly than in plants and vertebrates, particularly in areas where indigenous habitats are replaced by an anthropogenic one” “ Intensively managed and offering limited habitat opportunities for both plants and insects, lawns are biodiversity poor and ecologically insensitive.” (Smith 2014 - Adding ecological value to the urban lawnscape. Insect abundance and diversity in grass-free lawns). • As identified in Council comments, urban heat island effect is a growing issue, trees and cool surfaces a key mitigation tool. Studies show grasses are better mitigating urban heat than lawns. In addition, as urban-heat increases with temperature increases, lawn heath is highly vulnerable as this species goes into dormancy to conserve energy during periods of heat. • Turf has been avoided to ensure future resilience to climate change.	
Proposed public domain finishes do not reflect the requirements of the Parramatta Public Domain Guidelines. For example, Council will not accept stone paving on Council footpaths in Sturt Street. In the parks, stone paving can be used sparingly in key areas where people congregate. It should not be used universally. Bins must conform to council's waste management system requirements (TBA).	All public domain areas are subject to the standards and requirements of Council's DCP. In the event of any inconsistency, the approved Landscape Plans are to prevail. Details demonstrating compliance must be submitted to the Certifier prior to the issue of the relevant Crown Building Works Certificate for each building or Subdivision Works Certificate. <u>Stone paving</u> Stone paving in streetscapes has been maintained in order to align with the intent for a low solar reflect index (SRI) mitigating urban heat island effect. In response to Council comments in the Neighbourhood Park, 'PV-02' has been replaced with concrete unit paving. <u>Bin selection</u> Materials schedule updated to include references to PDG and CoP approval. FPA does not agree to providing revised landscape plans to CoP prior to the commencement of construction works. Plans will remain consistent with the approval, and if changes are required this may require a Section 4.55 modification which will require referral and comment from CoP.	• Hassell/Bates Smart Telopea Urban Renewal Public Domain Plan • Telopea Urban Renewal Stage 1A-1 Public Domain Landscape Works Development Application
Telopea Masterplan envisaged a 9-storey height to the Stage 1A area. Building B and D, at 10 and 15 storeys respectively, is not in line with this vision. As such, any additional height increases are not supported, especially when it results in buildings that exceed the maximum height limit control in PLEP 2011. It is important to manage the height within the Stage 1A area to distinguish it from the denser Core on the other side of	Taller buildings within the Stage 1A Project Application site are the direct result of the SDRP process. In particular the SDRP voided feedback to the project team encouraging: <i>opportunities for a broader range of architectural expression should be investigated and these could include..... avoiding generic outcomes through appreciation of and emphasis on local character....greater height variation across the precinct –</i>	• Stage 1A DA Design Report pg.18, 20, 23, 25 • Scale Transition Diagram

Council Comments (February 2023)	FPA Response	Reference Drawings																														
Sturt Street and to provide a strong height transition away from the light rail stop and down into the lower-scale suburban areas.	<i>possibly above the current maximum heights if there are appropriate height reductions elsewhere and/or reductions in building footprints (23 April 2021)</i> <i>Built form strategies for achieving design diversity throughout the precinct, including study options for GFA distribution (23 April 2021)</i> <i>The adoption of SDRP 01 advice was welcomed, with the following design changes supported..... some increase in the height of building envelopes – contingent on provision of improved good design and amenity outcomes for the ground plane and building envelopes generally (30 June 2021).</i> Additional heights that exceed the maximum PLEP 2011 height limit has accordingly been a long established principle for the project, endorsed by the SDRP as the Department’s and the Minister for Planning expert design advisor. It is consequently wholly reasonable that the FPA and the project team adopted the recommendations of the SDRP. Recognising that increased heights have always been contingent on improved urban design and public domain outcomes (as reinforced by the SDRP feedback), the project team has pursued taller, compact tower forms, always on the basis that doing so, facilitates improvements across the Stage 1A Project Application site. This has included: • provision of a new 3,500m² public accessible park within the centre of the Stage 1A Project Application site, which will receive very good levels of direct solar access throughout the year (including mid-winter) and become a focal point for the area; • introduction of a new internal loop road to provide each building with a street address and to improve access and legibility of the new public park; • improved configuration and distribution of building typologies into five distinct forms with height concentrated towards the Telopea Core Precinct and reduced forms across the broader Telopea Concept Plan Area to respond to the future desired character of the Telopea Precinct; • increased variation and visual interest in the built form as encouraged by the SDRP; • ensuring greater levels of residential amenity, particularly with regard to visual and acoustic privacy, number of apartments per core, and solar access; • ensuring improved building form interfaces, including the podium base and tower compositional elements proposed for Building C and Building D to break up bulk and scale; and • improved retention of native vegetation and important tree groupings, which will reinforce the existing quality and character of Telopea. The taller, compact built forms that facilitate the above improved outcomes result in the following height exceedances: <table><tr><th>Building</th><th>PLEP 2011 Maximum Height (m)</th><th>Stage 1A Project Application Proposed Height (m)</th><th>Variance Approx (m)</th><th>Variance (%)</th></tr><tr><td>Building A</td><td>28m</td><td>18.58m</td><td>-9.42m</td><td>-33.6%</td></tr><tr><td>Building B</td><td>28m</td><td>48.88m</td><td>+20.88m</td><td>+74.5%</td></tr><tr><td>Building C</td><td>28m</td><td>31.90m</td><td>+3.90m</td><td>+13.9%</td></tr><tr><td>Building D</td><td>28m</td><td>32.12m</td><td>+4.12m</td><td>+14.7%</td></tr><tr><td>Building E</td><td>28m</td><td>30.13m</td><td>+2.13m</td><td>+7.6%</td></tr></table> <i>*Proposed height is approximated due to the complexity of the sloping terrain.</i> Building A sits well below the maximum permissible building height under PLEP 2011 (6m below the maximum height limit).	Building	PLEP 2011 Maximum Height (m)	Stage 1A Project Application Proposed Height (m)	Variance Approx (m)	Variance (%)	Building A	28m	18.58m	-9.42m	-33.6%	Building B	28m	48.88m	+20.88m	+74.5%	Building C	28m	31.90m	+3.90m	+13.9%	Building D	28m	32.12m	+4.12m	+14.7%	Building E	28m	30.13m	+2.13m	+7.6%	Due to the sloping terrain, buildings contain few sleeve apartments on lower ground levels which can be read as a storey higher at the boundaries. These buildings, however, are largely perceived as the storeys nominate in the diagram.
Building	PLEP 2011 Maximum Height (m)	Stage 1A Project Application Proposed Height (m)	Variance Approx (m)	Variance (%)																												
Building A	28m	18.58m	-9.42m	-33.6%																												
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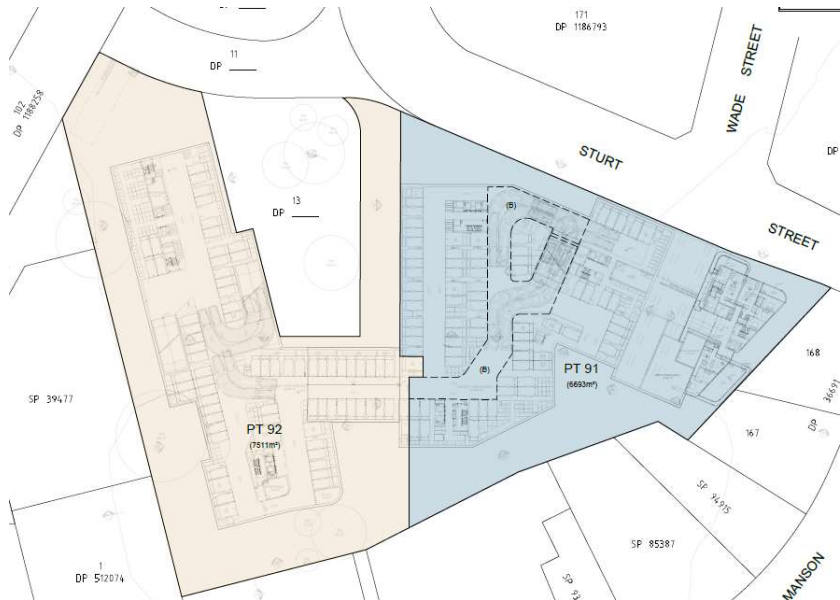
Council Comments (February 2023)	FPA Response	Reference Drawings
	Building B's proposed height is the result of careful master planning which seeks to achieve a GFA compliant scheme which focuses on; • Optimising Road networks and pedestrian connectivity – the linking between Telopea Light Rail Plaza and Mason Street towards the south and connection to Winter Street. • Maximising and activating open space between buildings to achieve high visual amenity, passive surveillance and solar amenity. • Creating smaller, fine grain building footprints which humanise the podium scale as to enhance pedestrian amenity and to avoid lengthy ground plane expression. As such, generous areas have been allocated within the heart of the development to a public park and pedestrian links, leaving ample site area for architectural development. The result is a fine grain development with a small footprint but taller scale. Buildings share brick podium base address the human pedestrian scale and diverse tower articulation and scale that address the future of Telopea. This design choice is far more sensible than a traditional massing strategy (stacked pancake form) which may result in larger footprints of consistent street facades which may be height compliant but unsympathetic to the future development and context of Telopea. (refer to diagram). Building B's proposed height is also contextualised against the adjoining Core Precinct and provides a transition in height between marker buildings adjacent to Telopea Station and the remainder of the Telopea Concept Plan Area. The proposed height exceedances of Buildings C, D and E are attributed to: • the site's topography which begins to fall steeply towards the site boundaries; • roof features; and • lift overruns. The distribution of height within the Stage 1A area has been carefully designed to distinguish it from the denser Core on the other side of Sturt Street and to provide a strong height transition away from the light rail stop and down into the lower-scale suburban areas. This is evident through the 'Scale Transition Diagram' which displays a steady transition in stories from western, eastern and southern frontages which front the low-rise residential context and culminates in the dense northern façade facing directly opposite the Core Precinct which hosts towers ranging from 14-24 storeys. The assessment supporting the Stage 1A Project Application (including the Environmental Impact Assessment, several Responses to Submissions, Stage 1A Design Reports, ADG compliance schedules and this entire design excellence package) collectively demonstrate that the increases in height do not result in significant impacts. Building separations, visual privacy and amenity have been addressed earlier in this feedback register. The proposed heights do not result in additional overshadowing, wind or visual impacts as demonstrated through the documentation submitted to date (refer to Response to Submissions, Urbis and Stage 1A Design Report, Rev J 23.07.28). The Clause 4.6 Stage 1A Building Height Variation Request prepared to support the proposed heights also demonstrates that compliance with the PLEP 2011 development standard is unreasonable and unnecessary on the basis that impacts would not be materially improved if compliance with the PLEP 2011 control was achieved. In fact, the project team has consistently demonstrated that a PLEP 2011 building height compliant scheme would result in larger building footprints and would consequently reduce the quantum and quality of open space and amenity to be provided.	
Stage 1A DA shows 3.1m floor to floor heights in the schedule and elevations, despite mentioning NCC requirement of	The Stage 1A Project Application has adopted a 3.1m floor to floor height. The Clause 4.6 Variation to Height has been amended to reflect the adopted floor to floor height.	• PLA-AR-DA0201 - PLA-AR-DA0208 BLDG ELEVATIONS • PLA-AR-DA0250 - PLA-AR-DA0254 OVERALL SECTIONS • PLA-AR-DA0271 - PLA-AR-DA0277 OVERALL ELEVATIONS

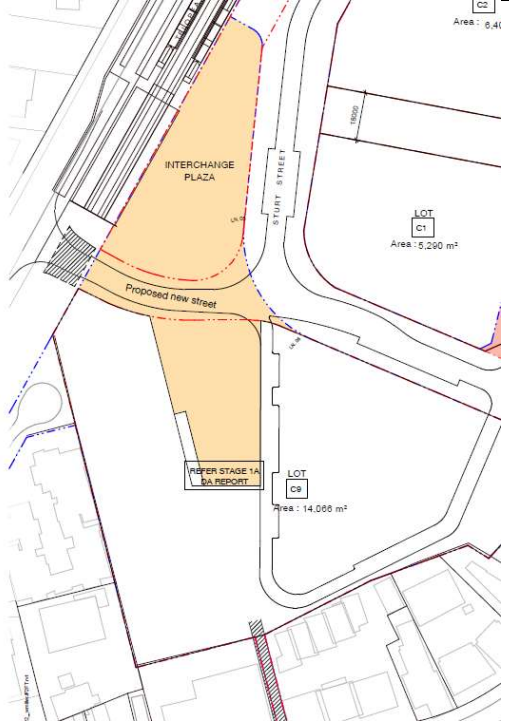
Council Comments (February 2023)	FPA Response	Reference Drawings
3150mm in Clause 4.6. Further clarification as what the floor-to-floor heights are within Stage 1A is required.		
The Design Report and Clause 4.6 must include lower ground and upper ground levels when discussing the overall height of Buildings (for example, Building E is 9 storeys when including the lower and upper ground levels.)	The Stage 1A Urban Design Report and clause 4.6 Request to Vary the Height have both been updated to adopt the PLEP 2011 definition of storey and basement. It is important to emphasise however that the PLEP 2011 statutory building height control is expressed in metres not storeys. Expression and assessment of building height should always accordingly be articulated in terms of metres. References to storeys throughout the documentation are for explanatory purposes only. In accordance with PLEP 2011, a storey is defined as: <i>a space within a building that is situated between one floor level and the floor level next above, or if there is no floor above, the ceiling or roof above, but does not include—</i> (a) <i>a space that contains only a lift shaft, stairway or meter room, or</i> (b) <i>a mezzanine, or</i> (c) <i>an attic.</i> The Stage 1A DA proposes five building forms across the site ranging from 4 – 16 storeys. The tallest building (B) is located centrally within the site, while the remaining buildings (A, C, D and E) range from 4 – 10 storeys and are located at the interface of adjoining development. Given the topography of the site, an upper and lower ground level has been introduced across Stage 1A. While 'ground floor' is not defined in PLEP 2011, a basement is defined as: <i>the space of a building where the floor level of that space is predominantly below ground level (existing) and where the floor level of the storey immediately above is less than 1 metre above ground level (existing).</i> In accordance with this definition, where the either of the ground floor levels is generally more than 1 metre above the existing ground level, it has been counted towards the total number of storeys proposed.	• Stage 1A DA Design Report • Clause 4.6 Variation Request
Buildings within the Stage 1A Precinct are not considered perimeter buildings and therefore the following building lengths must be reduced to 50m: • Building E: 58m • Building B to Sturt St: 72m • Building C to Mew St: 51m	Council's recommendations in respect of building lengths have been considered by the design team. Building lengths have been reduced through thoughtful articulation with the use of building breaks, changes in built form scale and changes materiality, as set out below. • Building B to Sturt Street ○ Building B has been designed to be read as 3 sections: two towers and a central podium. ○ The podium is 72m in length. Two indentations of 3m and 3.8m are proposed to break up the building form allowing it to be read as a 23m tower, 20m podium bridge and another 20m tower. ○ Generous building breaks of 3m & 3.8m have been provided between the towers to create a clear transition in scale. ○ The podium composition along Sturt Street is strongly articulated and composed through the expression of archways. This articulation results in a modulated podium form rather than a consistent monotonous wall, which helps reduces the perception of the podium's length. ○ The proposed use of brick on the podium brick column base along with a recessive darker toned façade animates the street edge and reduces perceived scale. • Building C to Mew Street	• PLA-AR-DA0201 - PLA-AR-DA0208 ELEVATIONS & PLA-AR-DA0271 - PLA-AR-DA0275 OVERALL ELEVATIONS <i>Building B Northern Façade illustrating the podium indentations</i> 

Council Comments (February 2023)	FPA Response	Reference Drawings
	○ Building C has been designed to be read as a tower sited on a larger human scale podium with ample breaks in material and indent to reduce perceived scale. ○ The podium is ~52m in length and is two stories high. An indentation of 2.6m and dark recessive material palette are proposed to break up the building form. ○ The building break of 2.6m has been provided throughout the tower and podium to create a clear transition in scale. ○ The podium composition along Mew Street is strongly articulated and composed through the expression of columns. This articulation results in a modulated podium form rather than a consistent monotonous wall, which helps reduces the perception of the podium’s length. ○ The proposed use of brick on the podium brick column base along with a recessive darker toned façade animates the street edge and reduces perceived scale. ○ Variation in podium scale (evident in change in height and material) further accentuates this visual separation. With the building being only 2m off from the suggested 50m building length, we believe a break of 2.6m along with aforementioned design choices clearly highlights this breakdown in street wall scale and highlights pedestrian amenity. ● Building E ○ Building E has been designed to be read as two separate towers which share a bisected podium base; ○ The podium is ~58m in length and is two stories tall with a lower storey of sleeve apartments. An indentation of 2.1m and a dark toned recessive façade break up the building form at the ground plane. ○ The building break of ~4.6 – 8.3m has been provided between the towers to reduce its bulk and scale. ○ The podium composition along the public domain is strongly articulated and composed through the expression of columns. This articulation results in a modulated podium form rather than a consistent monotonous wall, which helps reduces the perception of the podium’s length. ○ The proposed use of brick on the podium brick column base along with a recessive darker toned façade animates the street edge and reduces perceived scale. ○ With the building being only 8m off from the suggested 50m building length, we believe a break of 2.1m at the core of the podium with aforementioned design choices clearly highlights this breakdown in street wall scale and highlights pedestrian amenity.	<i>Building B Northern Façade indicative render illustrating the highly articulated a modulated podium and tower façade articulation which further dissects the tower into 3 segments.</i>  <i>Building C Southern Façade illustrating the podium indentation of 2.6m</i>  <i>Building C Southern Façade indicative render illustrating the highly articulated a modulated podium.*</i>

Council Comments (February 2023)	FPA Response	Reference Drawings
		 Building E façade illustrating the podium indentation of 2.1m  Building E Eastern Façade indicative render illustrating the highly articulated a modulated podium as well as the significant building break.

Council Comments (February 2023)	FPA Response	Reference Drawings
		
5. Public Domain		
The DA drawings do not currently reflect a number of design comments made in June 2022 by Council and should be amended. Amend the design layout to reflect comments made by Council's Public Domain and Open Space teams. The drawings (Appendix K) are lacking sufficient detail for either DA or construction approval. For example - one wall type WA01 (labelled 'stone wall – Adderton Road Link') is shown, however not located on plans. It is unclear what materials are proposed for all the other walls shown in Plaza and Hilltop Parks. The Stage 1 DA public domain plans must clearly reference the requirement to conform to Parramatta Public Domain Guidelines (PPDG) and Council standard construction details for all public domain materials, elements and finishes (i.e., add a note to this effect). Any development consent for Stage 1A must be conditioned (refer Council's submission June 2022) to ensure that final public domain fixtures, materials and finishes for council parks and footpaths are to be negotiated with, and approved by, Council during detailed design phases and prior to CC.	<u>Plan detail</u> - Landscape DA Packages have been updated for review, noting plans are produced for Development Application not for construction. - WA-01 wall is coded on HSL_S1A-2_L_1103. It is on the southern wall separating the Neighbourhood Park and the Adderton Road link. To assist with legibility, walls have been colour-coded. <u>Public Domain Materials and Finishes</u> <i>All public domain areas are subject to the standards and requirements of Council's DCP. In the event of any inconsistency, the approved Landscape Plans are to prevail. Details demonstrating compliance must be submitted to the Certifier prior to the issue of the relevant Crown Building Works Certificate for each building or Subdivision Works Certificate.</i> - In response to Council comments, furniture selection was updated to include most proprietary products (details supplied in schedule), except for select elements in the station plaza. Telopea Station Plaza to include both proprietary and select customised elements of proprietary furniture as consistent with the PDG, <i>"flexibility is allowed for custom-designed items to suit special designs in high profile locations"</i>.	• Hassell/Bates Smart Telopea Urban Renewal Public Domain Plan • Telopea Urban Renewal Stage 1A-1 Public Domain Landscape Works Development Application
It is clarified that Council is seeking to confirm that part of any development consent for Stage 1A or future detailed DAs for the Concept Area, that it is a conditioned requiring upgrade to the public domain (footpath and verge) as part of the development in accordance with the Parramatta Public Domain Guidelines.	LAHC (as the proponent) confirms it would accept a suitably worded condition requiring compliance with the Parramatta Public Domain Guidelines across Stage 1A and the broader Telopea Concept Plan Area. This commitment has already been reiterated in the Telopea Public Domain Plan prepared by Hassell HSL_S1A-1_L_0004 REV G Stage 1A & the Core to be in accordance with Telopea Concept plan area guidelines. Future DAs of Stage 2 & 3 is suitable to comply with PPDG to blend into area aesthetic. All public domain areas are subject to the standards and requirements of Council's DCP. In the event of any inconsistency, the approved Landscape Plans are to prevail.	• HSL_S1A-1_L_0004 REV G
6. Open Space		
Stage 1A latest subdivision plans indicate the encroachment of basement carparking into the Hilltop (Neighbourhood) Park. Carparking must be reconfigured to ensure all land dedicated to Council is deep soil and free from encumbrances. An adequate buffer zone must be provided between public open space and	Noted. The Subdivision Plan has been amended to ensure land dedicated to Council is deep soil and free from encumbrances including car park basement.	Updated Draft Subdivision Plan 51011 001DPB 27-07-23 underlay STRATUM

Council Comments (February 2023)	FPA Response	Reference Drawings
stratum below. Council will not accept land dedication above basement levels. 		
Stage 1A latest subdivision plan only provides a separate lot for the Arrival Plaza (Lot 12). As the Hilltop (Neighbourhood) Park is to be delivered to Council as part of Stage 1A it also requires a separate lot on the subdivision plan (Part Lot 10). Note that the Arrival Plaza comprises a significant portion of road reserve (Sturt Street) that is inconsistent with the intended public park purpose. 	Creation of Lot 13 for the Neighbourhood Park has been identified in the proposed Subdivision Plan.	51011 001DPA 27-07-23 STRATA  DA01.MP.110-Core & East Precincts - Lot Subdivision plan

Council Comments (February 2023)	FPA Response	Reference Drawings
		
7. Traffic and Transport		
That the Stage 1A scheme be revised to include additional visitor parking in line with RMS standards and Council DCP. The visitor parking shortfall has still not been addressed. As per previous Council comments in June, centres that qualify for reduced visitor parking rates are generally those strategic or major centres with significant interchanges such as the Parramatta CBD or Epping, not Telopea. Council Officers are aware there are significant issues currently within Telopea arising with existing residents and a high demand for on-street car parking due to increasing number of residential flat building developments and insufficient visitor car parking. It is further noted that the streets within Telopea are narrow with limited opportunity for on-street parking. As such, on-street parking cannot be considered for reducing the visitor parking rate.	The proposed visitor parking shortfall has been addressed in Section 5.7 of the Response to Submissions Report and the Addendum Traffic and Parking Statement prepared by (16 March 2022). In summary: - Noting the significant amount of new on-street parking that will be delivered as part of the broader Telopea Concept Plan, and particularly parking within the Telopea Core, visitor parking arrangements are considered appropriate for Stage 1A in the order of 1 bay/10 residential dwelling units. - It is also noted that the TfNSW (formerly RMS) Guide states: <i>“CoP may wish to reduce this requirement for buildings located in close proximity to public transport, or where short-term unit leasing is expected.”</i> - Proximity to reliable public transport, walking catchment to access a range of uses within the local community and provision of high-quality pedestrian and cycling infrastructure plus higher density residential development all influence car ownership and car usage. The overprovision of visitor car parking bays on-site impacts the opportunity to reduce car dependency in areas where there are high quality transport alternatives such as the Telopea development which is located immediately adjacent to the new Parramatta Light Rail (PLR) stop, with a service frequency of 7.5 minutes, and will also well be well supported by local bus services. It should be noted that in Western Australia, a recent update to State Planning Policy 7.3: Residential Design Codes - Apartments indicates a residential visitor parking requirement of 1 bay/8 dwelling units above 12 dwelling units with local DCP's allowing for concessions for developments located in activity centres such as Telopea whereby residential visitor car parking can be accommodated within the existing and/or planned future public on-street supply. This has also been confirmed through research undertaken by the Centre for Urban Research at RMIT in Melbourne. - It is noteworthy that the same rate of 1 bay/10 dwelling units is the same rate for visitor parking recommended in the Melrose Park Transport Management & Accessibility Plan (TMAP) – for an almost identical urban renewal project – where a rate of 1 bay per 10 dwelling units was recommended even though Stage 2 of the PLR was (and remains) not guaranteed. The same rate has also been endorsed for the Epping Town Centre DCP.	Section 5.7 of the Response to Submissions Report and the Addendum Traffic and Parking Statement prepared by (16 March 2022)

Council Comments (February 2023)	FPA Response	Reference Drawings
	- Traffic engineering and car parking best practice entails the promotion of efficiency of use of public infrastructure where possible such as utilising on-street public parking supply to satisfy off-site residential visitor car parking demands, where required. Typically, residential visitor car parking peaks in the evening on weekends and on Sundays outside typical commuting or business peak periods with limited overlap in peak demands. This is an efficient and effective use of public infrastructure which can be managed through the establishment of a Parking Control Management Area and associated Car Parking Management Plan to be delivered prior to Construction Completion. - It is also highlighted that the SDRP encouraged the project team to explore opportunities to further lower proposed parking rates to reduce car reliance and prioritise both pedestrian movement and public transit uses (30 April 2021).	
The following must be addressed as part of the application: Raised Crossings: Information needs to be provided regarding forecasted pedestrian volumes to provide evidence that Council's warrants for pedestrian crossings will be met. If the warrants are not met, the proposal may need to be revised which could affect the geometry of the road reserve area and have wider implications. Pedestrian Refuge Islands: A sightline assessment must be carried out as per previous comments to ensure location is safe. The lane widths has been addressed. Cycleways: Previous comments have not been addressed such as having a 3m shared path on the southern verge of New Link Road which is to have priority crossing over Mews Street. The western path of Mews Street should be a shared path/step free access is to be provided on the main alignment of the Manson Street connection as per Public Domain plan p33. Evans Road should include an uphill bike lane, and PS-2 logos in lane for downhill mixed traffic. Parking Bays: An inadequate supply of on-street parking spaces have been provided near the light rail stop. Wade/Mews/Sturt Intersection Design and Mews Street General Comments: The swept paths for a 12.5m HRV turning left from and into Mews Street is not acceptable as the vehicle is crossing the centrelines which is against NSW Road Rules. Accordingly, the intersection geometry needs to be revised further to ensure the design vehicle does not cross the centrelines.	While the below items do not directly relate to Stage 1A, responses are provided below: Raised Crossing: This issue will be addressed as required during the detailed design stages of the project with regard to relevant traffic engineering standards and TfNSW policies and guidelines. Pedestrian Refuge: Refer JWP Sightline Study Cycleways: It is our understanding that there is currently discussion in relation to the removal of the New Link Road extension and hence the 3m shared path and crossing over Mews Street. This issue as well as the western path of Mews Street and the Evans Road bicycle lane will be discussed in further detail with Council as required to confirm need and design protocols as part of JWP's engagement. Parking Bays: The proposed on-street car parking supply on Sturt Street is more than adequate to cater to pick-up/drop-off (Kiss n Ride) demands associated with the Telopea Light Rail Station located along the western boundary of the precinct. It is recommended that two (2) to four (4) bays along the western side of Sturt Street be allocated to Kiss n Ride purposes from 7 to 9 a.m. and 4 to 6 p.m. Monday-Friday and otherwise available as 2-hour maximum short-term parking 9 a.m.-4 p.m. Monday-Friday. This will allow for maximum utility of these bays for appropriate and legitimate purposes minimising commuter and employee parking use leaving this supply available for visitors and other users in the area and allowing for adequate turnover. This issue will be considered as part of the establishment of a Parking Control Management Area for the precinct and in the development of a Parking Management Plan delivered prior to Construction Completion. The proposed supply of two (2) to four (4) Kiss n Ride bays is more than adequate to cater to the anticipated frequency of light rail and bus services in the future. A typical Kiss n Ride car parking supply at a suburban railway station ranges from 5 to 15 bays and caters to service frequencies of 5 minutes or less during the peak periods. Wade/Mews/Sturt Intersection: Mews Street to Sturt Street (left turn heading north west) cannot be undertaken without that encroachment for that size vehicle but importantly, there is no where in Mews Street for this vehicle to turn around and then make that move. There is turning facility within the building for garbage trucks and those vehicles can turn appropriately. Larger vehicles will exit Mews Street by heading north west along Mews without undertaking a U-turn/ 3 point turn.	JWP 110500-04-SK110-1 – Adderton Rd & Manson St Sightline study
8. Tree Management		
Inconsistencies remain between the documentation provide regarding tree retention/removal and tree protection namely the arborist report, stormwater plans, landscape plans and master plans. The arboricultural impact appraisal and method statement has not taken into consideration all relevant documentation to allow for a complete assessment of works proposed. The arboricultural impact assessment has not identified possible impacts upon trees to be retained within the assessment which	Architecture, Landscape Architectural, Project Arborist and civil drawings have been coordinated. LAHC (as the proponent) confirms it would accept a suitably worded condition requiring: - Written confirmation from a Project Arborist to confirm the viability of the trees long term. - Specific remedial actions that will be taken to ensure suitable air porosity to existing tree soil areas is guaranteed.	

Council Comments (February 2023)	FPA Response	Reference Drawings						
is considered critical for the assessment process to ensure the viable long-term retention of significant trees and vegetation within the precinct. For any DA approval, the following DA conditions are required: - Written confirmation from a Project Arborist to confirm the viability of the trees long term. - Specific remedial actions that will be taken to ensure suitable air porosity to existing tree soil areas is guaranteed.								
9. Social Impacts								
Stage 1A be revised to adjust bedroom mix and inclusion of adaptable units in line with the Parramatta DCP 2011. Council officers note the dwelling mix has not changed from the previous submission. Shortfalls remain in the proportion of two and three bedroom properties. the dwelling mix must fall within the range of diverse housing options as presented in the PDCP 2011. The rationale for the dwelling mix has not been stated by the applicant. As Stage 1A comprises private market, it is important to provide a adequate mix to meet the needs to future residents. 2021 Census data confirms the needs for larger housing options in Telopea, considering over 30% of households in the suburb are couples with children. Forecast estimates also determine minimal change between 2021 and 2041 which also supports the need to revisit the dwelling mix proposed (e.g. 2.53 persons/household in 2021 and 2.47 persons/household by 2041). (Refer to forecast IDCity of Parramatta)	The unit mix for Stage 1A is designed towards smaller unit sizes for to address ADG and commercial outcomes. As Stage 1A will be delivered first, the intent is not to have too much larger stock that would compete with the existing free standing stock in the area. The market mix put forward by Frasers is representative of what the market desires at this point in time, and the social and affordable mix reflects the needs of LAHC. In addition it is worth highlighting he breakdown and the reduction of contributions payable was provided to Council via email on the 28/4/2022. Adjusting the mix to provide more 2 and 3 bedroom dwellings, would result in the yield being reduced (albeit within the same GFA), and therefore the overall development contributions payable would reduce. More specifically, 3 bed 2 bath apartments are between 95-100m2 and 1 Bed 1 bath apartments are 50-55m2. This means that for every additional 3 bedroom dwelling added, Frasers would delete 2 x 1 bedrooms to ensure the total GFA remains under the total currently proposed. Under CP2021, a shif towards a larger mix it would reduce the overall contributions payable, as demonstrated by the simple example below: <table><tr><td>1 x 3B2</td><td>+\$23,251</td></tr><tr><td>2 x 1B1</td><td>-\$29,452 (2 x \$14,726)</td></tr><tr><td>Total</td><td>-\$6,201</td></tr></table> As subsequent stages of the development are delivered the dwelling mix may change subject to market conditions and needs and may include more larger dwellings so as to bring the overall precinct more in line with the proposed PDCP 2011 mix.	1 x 3B2	+\$23,251	2 x 1B1	-\$29,452 (2 x \$14,726)	Total	-\$6,201	
1 x 3B2	+\$23,251							
2 x 1B1	-\$29,452 (2 x \$14,726)							
Total	-\$6,201							
10. Sustainability								
The following conditions are recommended for installation of dual reticulation systems: Stage 1A conditions: a) In relation to Stage 1A development that prior to CC stage, a dual reticulation (dual pipe) system is to be installed of sufficient size and capacity to supply all potable and non-potable water uses for the building, including cooling towers, and a single connection point at the boundary of the site for connection to a future recycled water scheme. b) In relation to Stage 1A development that prior to CC stage, it must be demonstrated that the building is to capture rainwater and provide sufficient storage for reuse of no less than 92% of the typical annual rainfall falling on the building's roof for non-drinking water uses through the dual reticulation system. c) In relation to Stage 1A development that prior to CC stage, the development shall confirm that all cooktops are induction type. Dual Piping - Not addressed, recommended conditions of consent (as per Council response June 2022). Whilst FPA advises no commitment from Sydney Water for infrastructure up	Dual reticulation is not currently proposed for the Telopea Concept Plan Area including Stage 1A on the basis that the Sydney Water Growth Servicing Plan does not incorporate any servicing or infrastructure delivery updates in the area up to 2027. Furthermore, dual reticulation is not considered an optimal or efficient infrastructure solution as its construction presents additional cost and risk that services will age significantly before Sydney Water infrastructure is available to connect to. Notwithstanding this FPA is in ongoing discussions with Sydney Water regarding dual piping for the site. Should an agreement be reached that Sydney Water will provide dual reticulation infrastructure, FPA will revise the design for the relevant stage/s of the Telopea Concept Plan Area. LAHC (as the proponent) is not prepared to accept a consent condition requiring dual reticulation in the absence of Sydney Water committing to delivery of such infrastructure. On the basis that dual reticulation is not likely to be delivered for Stage 1A, LAHC (as the proponent) is not able to accept a consent condition requiring demonstration that Stage 1A buildings will capture rainwater and provide sufficient storage for reuse of no less than 92% of the typical annual rainfall falling for non-drinking water uses through the dual reticulation system. LAHC (as the proponent) is willing to accept a suitably worded condition requiring induction cooktops to be confirmed prior to the relevant construction certificate being obtained.	TELOPEA URBAN RENEWAL PUBLIC DOMAIN PLAN Section 5, Section 6, Section 7						

Council Comments (February 2023)	FPA Response	Reference Drawings
to 2027, the reason for the dual piping is future-proofing to support the full utilisation of alternative water infrastructure when available in the future. Urban Heat - Not addressed. A sustainability report should be provided that demonstrates the DCP's relevant DCP requirements have been addressed.	Urban Heat is addressed in Public Domain Plan. DCP requirements are not specifically relevant to Stage 1A SSDA.	
Council's Sustainability technician has reviewed the information to support compliance with the SEPP (BASIX). They conclude that the BASIX Certificates should be amended and resubmitted to ensure they comply with the BASIX regulation and correctly reflect the nature of the proposed development. Items to be addressed include: - A BASIX stamped plan set is required that contains all necessary information required by the BASIX certificates and the BASIX thermal comfort protocol. - The basement car park is described in the BASIX certificate with only mechanical exhaust, which is not permissible under the NCC. - One apartment (D.LG.04) does not comply with the regulated BASIX cooling cap. This and several other apartments have incorrect thermal loads within the BASIX certificate. - The urban nature of the development and the wind sheltering that will be caused by the development (self-shielding), and neighbouring developments should be considered for each apartment to ensure cooling loads are correctly estimated. - Insufficient information is provided on the plans to confirm proposed window opening sizes. However, several rooms requiring fall-protected openings have not been modelled per the requirements of BASIX and NatHERS. - All skylights shown on the plans have not been included in the NatHERS certificates. - The NatHERS certificates for several apartments (E03.06, E04.06, etc.) describe a westerly orientated apartment, whereas the apartments are shown with easterly aspects on the plans. The NatHERS certificates state they are based on plans prepared by a different company than the plans submitted with the application.	Frasers are committed to providing Council with relevant information and request the sustainability technician's exact requirements prior to reassessing and stamping BASIX plans. It is also worth highlighting: - Frasers' ESD consultants have advised that all relevant information has been provided. - While water and energy commitments have not been explicitly stated in the notes for plans on Legend/NatHERS assessment page, these items are covered in the documentation and an updated set of notes for this page that will cover this. - Basement car park has mechanical supply and exhaust, VSD fan and carbon monoxide monitor in accordance with NCC requirements. - Reassessment of noncompliant units will occur and included in updated BASIX and NatHERS certificates along with other changes requested by Council. - In accordance with the industry correspondence, attached. In cases where council want to override the NatHERS technical notes with regard to terrain category we need council to provide written instruction of the terrain category they would like to every unit in the development which will then inform the changes to the assessment. - Elevations and Sections show window sizes and opening type. Fall prevention restrictors have been correctly modelled as 10%. Thermal Comfort notes on page two provide performance values. This information is thought appropriate for accurate ratings acceptable for DA purposes. It is requested that Council specify details of what additional information is being requested prior to reassessment.	Letter to Paramatta Council – Terrain Categories
13. Drainage and Catchment Management		
Matters relating to the assessment and design of Stage 1A shall comply with Council's requirements in Attachment B. Council's comments from June 2022 remain.	The stormwater management strategy provides an appropriate treatment solution which does achieve the outcomes and requirements of DCP 2011. The individual strategies for each of the development sites within the Telopea CPA area will be documented and provided as part of those future individual applications and will meet the requirements of DCP 2011. The proponent has provided responses to Attachment B in RTS 2 and remain unchanged.	Response to Submission 2
14. Waste Management		
Stage 1A development is required to increase the footprint of the waste holding area to accommodate a 60L/dwelling per week generation rate for recycling. Council requires the applicant to utilise a 60L/dwelling/week generation rate for recycling.	The waste and recycling requirements were calculated during the preparation of the Stage 1A Project Application in accordance with Parramatta Council's DCP 2011 prior to new requirements being introduced. 40L/dwelling/week generation rate for recycling is in accordance with DCP 2011.	SLR Waste Management Report

Council Comments (February 2023)	FPA Response	Reference Drawings
This is the requirement under the draft Parramatta DCP (adopted by Council on 28 November 2022) and will ensure the development is future proofed and consistency across the entire development is maintained. Although it is Council's preference to identify the waste capacity on revised plans, this matter can also be considered by DPE as a condition of consent.	It is considered reasonable to apply the same transitional arrangements to the DCP that apply to the PLEP and SEPPs.	
The application is to provide further details in relation to waste truck access to Stage 1A as detailed in Technical Assessment at Attachment B. Council's comments from June 2022 still stand. Council does not support the use of turntables, and the applicant must comply with Council's requirements in this regard.	The use of a turntable is considered by ASON as a safe and effective option given the layout, access arrangements and circumstances of the site. The proposed turntable within the consolidated single loading dock will also allow reversing and manoeuvring activities to be entirely contained within the site with limited space required . This will thereby reduce the need to construct an additional basement level which would limit the provision of deep soil across the Stage 1A Project Application site. The use of a turntable for service vehicles is a conventional state-of-the art practice for delivery and logistics across Australia and complies with relevant Australian Standards and traffic engineering best practice. A number of major retail operators such as Coles and Aldi have been exclusively implementing turntables in their developments across Australia. Turntables also allow for exclusive entry and exit to and from development sites in forward gear. A number of commercial and residential developments within the City of Parramatta have already implemented turntable arrangements on their sites. The proposal complies with Council's requirements to provide 4.5m clearance for HRV access into residential developments of 6 storeys or greater.	Item 14 – Telopea Concept Plan & Stage 1A Response to Request for Further Information December 2022