

A01 ROSS STREET TEACHING AND LEARNING HUB

SUBMISSIONS REPORT
AUGUST 2025

PREPARED BY MG PLANNING
SUBMITTED FOR UNIVERSITY OF SYDNEY
SSD-57838709

Report Contact

Nicola Gibson
Director, MG Planning
ngibson@mgplanning.com.au

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ABBREVIATIONS

ACHA	Aboriginal Cultural Heritage Assessment
BC Act	<i>Biodiversity Conservation Act 2016</i>
BDAR	Biodiversity Development Assessment Report
CFT	continuous footpath treatment
CIP	Campus Improvement Program – Stage 1 SSD (SSD_6123)
Council	City of Sydney Council
CPHR	Conservation Programs, Heritage and Regulation
DPHI	NSW Department of Planning, Housing and Infrastructure
EIS	Environmental Impact Statement
EOT	End of trip
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i>
EP&A Regulation	<i>Environmental Planning and Assessment Regulation 2021</i>
FASS	Faculty of Arts and Social Science
FIRA	Flood Impact and Risk Assessment
GFA	gross floor area
HAIA	Historical Archaeological Impact Assessment
HIS	Heritage Impact Statement
LGA	Local Government Area
m ²	square metres
MRV	Medium rigid vehicle
OSD	On-site detention
The Project	Ross Street Teaching and Learning Hub, the subject of this EIS
SES	NSW State Emergency Service
SSD	State Significant Development
Stage 1 SSD 6123	Stage 1 Campus Improvement Program State Significant Development approved in February 2015
TfNSW	Transport for NSW
TPZ	Tree protection zone
WMP	Waste Management Plan
WSUD	Water sensitive urban design

EXECUTIVE SUMMARY

This Submissions Report relates to the proposed Ross Street Teaching and Learning Hub (the Project) on the south-eastern corner of the intersection of Parramatta Road and Western Avenue (also referred to as Ross Street), Camperdown. On behalf of the University of Sydney (the Applicant), this Submissions Report has been prepared to address the matters raised by public agencies and the City of Sydney (the local Council), and public submissions throughout the exhibition period.

The State Significant Development Application (SSDA) was lodged with the Department of Planning, Housing and Infrastructure (DPHI) in February 2025 (SSD-57838709). The SSDA was placed on public exhibition from 11 March 2025 to 7 April 2025.

This Submissions Report has been prepared in accordance with the *DPHI State Significant Development Guidelines – Preparing a Submissions Report March 2024*.

Overview of submissions

The SSDA was publicly exhibited from 11 March 2025 to 7 April 2025. DPHI issued a letter to the Applicant on 9 April 2025 requesting the preparation of a Response to Submissions. There were twelve (12) submissions received as follows:

- Government agencies:
 - Heritage NSW (Aboriginal Cultural)
 - Fire and Rescue NSW
 - Heritage NSW
 - City of Sydney Council
 - NSW State Emergency Services
 - Transport for NSW
 - Conservation Programs, Heritage and Regulation Group
 - Ausgrid
 - Sydney Water
 - Civil Aviation Safety Authority
- General public
 - Benjamin Phillips
 - One anonymous submission.

The key issues raised in the submissions can be broadly grouped into the following categories:

- Heritage and archaeology
- Traffic and pedestrian safety
- Landscape and tree impacts
- Flooding

This Submissions Report provides a response to all submissions received.

Actions taken since exhibition

Since the SSD application was publicly exhibited, further consultation has been undertaken with Heritage NSW, Transport for NSW, the City of Sydney Council (Council), and Conservation Programs,

Heritage and Regulation Group (CPHR Group) to discuss the issues raised within their submissions. Details of all consultation undertaken is provided in **Appendix B**.

The Applicant has amended the Project in response to the submissions and stakeholder consultation. The key changes are summarised as follows:

Building:

In response to Council's submission, the waste room on Level 2 has been reconfigured and the area increased from 13m² to 18.3m² to enable better manoeuvrability. The overall GFA has remained the same.

Public domain:

In response to submissions received from both Council and Heritage NSW regarding the heritage significance of the palisade fencing along Parramatta Road, it is proposed to retain the fencing whilst providing for three discrete openings along the frontage. These openings are essential to:

- ensure the safety of pedestrians
- provide for better visual sight lines into and from the University
- allow for additional seating around the bus stop
- provide improved footpath gradients and width
- improve passive surveillance of the site.

This Submissions Report is accompanied by:

- Amended Architectural Plan – Level 2 (**Appendix C**)
- Amended Landscape Plans (**Appendix D**)
- Amended and new reports (refer **Table 1** for full list).

Response to submissions

Section 4 of this Submissions Report provides a detailed response to each matter raised by the various public agencies. A summary of the key issues and responses is provided below.

- **Heritage - Fencing**

Comment: Both the City of Sydney (Council) and Heritage NSW raised concerns regarding the proposed removal of 40m of the palisade fence along Parramatta Road. Council recommended that consideration be given to removing only sections of the fencing to create new openings. Heritage NSW indicated that an analysis of options to avoid or minimise the removal of the heritage fencing and gates should be undertaken.

Response: An analysis of alternative treatments for the fencing has been undertaken (refer **Appendix H**). As a result, the Landscape Plans have been amended to retain the fence with discrete openings to facilitate pedestrian movement and ensure the area around the bus stop is widened and pedestrian amenity improved.

- **Heritage Interpretation**

Comment: Heritage NSW advised that the proposed relocation of the Ross Street Gates and removal of a section of the heritage stone and metal fence warrant the preparation of a Heritage Interpretation Plan (HIP).

Response: The University has engaged Urbis to prepare a Heritage Interpretation Plan to satisfy Condition B14 for the Ross Street Gates and Fencing. It is proposed that the Heritage Interpretation Plan will be developed during the detailed design in consultation with Heritage NSW prior to commencement of works.

- **Historical Archaeology**

Comment: Heritage NSW questioned the statement in the Historical Archaeological Impact Assessment (HAIA) that it is unlikely that remains of air raid trenches would be present with sufficient intactness to be assessed as locally significant. It also noted inconsistencies between recommendations provided in the HAIA and the proposed mitigation measures outlined in the EIS.

Response: Detailed consultation with Heritage NSW regarding historical archaeology was undertaken following exhibition. Additional evidence indicating extensive disturbance of the site was provided which indicates that there is Low potential for intact remains which would be likely to qualify as relics of local or State significance on the site (refer Urbis advice at **Appendix B**).

- **Aboriginal Cultural Heritage**

Comment: Heritage NSW questioned the conclusion in the Aboriginal Cultural Heritage Assessment (ACHA) that the archaeological potential of the site is low and requested further evidence be provided in support of the conclusion.

Response: An updated ACHA is provided which confirms that the two areas of moderate potential along the western boundary are unlikely to impact previously undisturbed ground surface.

- **Public Domain**

Comment: Council requested that public domain levels and gradients of the new interface with Parramatta Road be submitted for review. It also recommended that a continuous footpath treatment (CFT) be provided along the Parramatta Road frontage and that the proposed deletion of the refuge island at the Western Ave/Parramatta Rd intersection would only be supported if a CFT is included in the scope of works.

Response: Following consultation with Council it has been agreed that details of levels and gradients will be discussed during the detailed design phase following determination of this SSD application. Transport for NSW (TfNSW) has advised it does not support a CFT at the Western Ave entry, noting that the existing curb proposed to be removed (in the middle of the existing pedestrian crossing across Western Ave) is not a refuge island. Further, there is insufficient space to install a pedestrian refuge and providing a refuge in this location does not meet the requirements of the Sydney Streets Design Code:

- **End-of-trip facilities**

Comment: Council requested that further analysis be provided to demonstrate that sufficient bicycle parking and end-of-trip facilities are provided on campus, and within accessible locations to the Project.

Response: Further information regarding campus end-of-trip facilities (EOT) as well as those immediately adjoining in the A02 FASS building has been provided (refer discussion in **Section 4**). This includes a site plan showing all EOTs on campus and additional drawings showing existing A02 End of Trip facilities (refer **Appendix K** and **Appendix L**).

- **Traffic**

Comment: TfNSW advised that it does not support the proposed bike box and questioned the safety of the proposed zebra crossing on Western Ave. It also requested further evidence regarding access to the site by medium rigid vehicles (MRVs).

Response: Following further consultation with TfNSW and provision of additional evidence in support of the bike box and zebra crossing, TfNSW has indicated its general support to these changes. A sign on Parramatta Rd restricting left entry into Western Ave to vehicles under 6m has also been agreed.

- **Flooding**

Comment: CPHR raised concerns regarding flooding on the site and requested further modelling and evidence be provided. NSW State Emergency Services (SES) also raised queries regarding flooding and emergency evacuation.

Response: An updated Flood Impact and Risk Assessment (FIRA) has been prepared by GRC Hydro and is included in **Appendix O**. GRC Hydro has also prepared a Flood Response Statement to each of the matters raised by CPHR (refer **Appendix P**). The Emergency Management Plan has been updated to address issues raised by the SES and is included in Appendix 3 of the updated FIRA.

- **Development Contributions**

Comment: Council requested a condition of consent be included requiring the payment of a section 7.11 contribution calculated in accordance with the City of Sydney Development Contributions Plan 2015.

Response: The Department's *Planning circular PS 25-002: Crown development applications* and the Department's *Local Infrastructure Contributions Practice Note - Exempting certain development from contributions* sets out the reasons why Crown developments should be able to seek exemptions from contributions payments and specifying those for educational services. The effect of the Circular is that where the applicant is a Crown authority and the development is for specified types of development (including educational services and health services) only contributions for traffic and stormwater infrastructure can be levied. In this instance, the Project does not require any external traffic improvements with internal improvements for access forming part of the development. Further, the Project does not generate any additional demand on Council's stormwater infrastructure. Certain categories of Crown development including the A01 Ross Street Teaching & Learning includes infrastructure for the broader community and is unlikely to generate demand for public amenities or public services in the same way as private development.

Updated justification and evaluation

The report and the supporting documents have been informed by additional consultation and engagement with key agency stakeholders. Overall, it is considered the updated Project is acceptable having regard to the relevant biophysical, economic and social considerations. Further:

- Amended Architectural Plan (Level 2) has been prepared to show the reconfigured waste room (**Appendix C**)
- Amended Landscape Plans have been prepared that detail the proposed changes to the palisade fencing treatment and include additional details regarding the soil depth and volumes (**Appendix D**)
- The additional flood modelling and analysis prepared by GRC Hydro confirms the proposed development will not cause significant flooding impacts
- Additional analysis of traffic conditions confirms that the proposed bike box and zebra crossing will improve pedestrian and cyclist safety without adversely affecting traffic access.
- Updated tree significance assessment

Having considered all relevant matters raised in public submissions received, the SSD proposal satisfactorily responds to all issues with technical documents and minor design amendments. The proposed SSD development is therefore concluded to be appropriate for the site and approval is recommended subject to appropriate conditions of consent.

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1 INTRODUCTION

This Submissions Report relates to the proposed Ross Street Teaching and Learning Hub at the corner of Ross Street and Parramatta Road, Camperdown. This Submissions Report has been prepared on behalf of the University of Sydney, to address the matters raised by public agencies, the City of Sydney (the Council) and public submissions throughout the exhibition period.

The State Significant Development Application (SSDA) was lodged with DPHI in February 2025 (SSD-57838709). The SSDA was placed on public exhibition from 11 March 2025 to 7 April 2025. This Submissions Report has been prepared in accordance with the DPHI *State Significant Development Guidelines – Preparing a Submissions Report March 2024*.

1.1. Exhibited Project

Development consent is sought for the construction and operation of the Ross Street Teaching and Learning Hub (the Project) which will be a multi-disciplinary general teaching space aimed at addressing the identified shortfall of quality teaching space across the University.

The Project comprises the following works:

- Construction of Building A01 comprising 5 levels providing teaching and learning spaces for general use by all faculties across the University
- Public domain improvements, including provision of an open plaza, outdoor furniture, pedestrian paths, new tree planting and soft landscaping
- Removal of stone and metal fence along Parramatta Road frontage
- Relocation of stone gates further north along Western Avenue
- Removal of other structures, including guard house in Western Avenue (noting that relocation of demountable buildings was previously approved under the Stage 1 CIP Concept Approval SSD 6123)
- Removal of 22 existing trees
- Earthworks
- Traffic and pedestrian access improvements.

1.2. Supporting documentation

This Submissions Report is supported by the following technical reports and documentation.

Table 1: Supporting documentation

Document	Consultant	Appendix
Submissions Register	MG Planning	Appendix A
Post Exhibition Consultation	University of Sydney	Appendix B
Amended Architectural Plan – Level 2	BVN Architects	Appendix C
Amended Landscape Plans	Oculus	Appendix D
Tree Significance Assessment	Tree IQ	Appendix E
Aboriginal Cultural Heritage Assessment (updated)	Urbis	Appendix F
MUSIC-Link Report	Robert Bird Group P/L	Appendix G

Document	Consultant	Appendix
Fence Options Analysis	Oculus	Appendix H
Ausgrid Connection Application and Offer	LCI	Appendix I
Pedestrian Wind Environment Study (updated)	Windtech	Appendix J
EOTs Campus Plan	University of Sydney	Appendix K
A02 EOT Facilities		Appendix L
Waste Management Plan (updated)	Waste Audit	Appendix M
Performance Based Design Brief Consultation		Appendix N
Flood Impact and Risk Assessment (updated)	GRC Hydro	Appendix O
Flood Response Statement	GRC Hydro	Appendix P
Technical Memo	SCT Consulting	Appendix Q
Mitigation Measures (amended)	MG Planning	Appendix R
Presentation slides for meeting with Heritage NSW		Appendix S
Presentation slides for meeting with City of Sydney		Appendix T
Parramatta Rd Hedge Advice	Urbis Tree IQ	Appendix U

2 ANALYSIS OF SUBMISSIONS

In accordance with the DPE *State Significant Development Guidelines*, the issues raised in the submissions are summarised in **Table 2** and **Section 2.2** below. A response to submissions is provided in **Section 4** of this report.

2.1. Breakdown of submissions

Table 2: Breakdown of submissions

Submitter	Category of Issues Raised						
	The Project	Procedural Matters	Impacts			Justification and evaluation of the Project	Issues beyond the scope of the Project
			Economic	Environmental	Social		
Department of Planning, Housing and Infrastructure	Requested a response to government agency submissions						
Public Authorities (State or Commonwealth Agencies and Council)							
City of Sydney Council				X		X	
Heritage NSW				X	X		
Heritage NSW (Aboriginal Cultural)		X					
Transport for NSW				X		X	
Ausgrid				X			
NSW State Emergency Service				X			
Sydney Water Corporation				X			
Fire and Rescue NSW		X					
Civil Aviation Safety Authority		X					
Conservation Programs, Heritage and				X			

Submitter	Category of Issues Raised						
	The Project	Procedural Matters	Impacts			Justification and evaluation of the Project	Issues beyond the scope of the Project
			Economic	Environmental	Social		
Regulation Group							
Stakeholder Groups or Individuals							
Benjamin Phillips	X						
Name withheld	X						

2.2 Categorising key issues

The key issues raised in the submissions include:

Heritage

- Council and Heritage NSW both raised concern regarding the heritage impact of removing the palisade fence along Parramatta Road and requested that partial openings in the fence be considered instead.
- Heritage NSW raised issues regarding:
 - the building's visual impact, particularly having regard to surrounding heritage buildings
 - relocation of the Ross Street entry gates
 - the need for heritage interpretation
 - proposed tree removal
 - the need for further archaeological investigations associated with potential air raid trenches on the site.

Flooding and stormwater

- CPHR, Council and NSW State Emergency Services (SES) provided comments on the flood modelling methodology, the conclusions of the flood assessment and the flood emergency management plan.
- Council requested that a MUSIC link report be submitted accompanying a stormwater quality assessment.

Traffic

- TfNSW raised issues regarding:
 - The proposed bike box and zebra crossing on Western Avenue
 - Ability for medium rigid vehicles (MRVs) to access the site
 - Public domain improvements and safety of pedestrians in the vicinity of the bus stop
 - Impediments to driver visibility (e.g. vegetation).
- Council requested that further analysis be provided to demonstrate that sufficient bicycle parking and end-of-trip facilities are provided on campus.

Public domain

- Council raised issues regarding public domain treatments, including continuity of footpath, design levels.

Aboriginal Cultural Heritage

- Heritage NSW questioned the conclusion in the Aboriginal Cultural Heritage Assessment (ACHA) that the archaeological potential of the site is low and requested further evidence be provided in support of the conclusion
- Heritage NSW requested evidence of correspondence demonstrating consultation with Registered Aboriginal Parties (RAPs) in accordance with the Aboriginal Cultural Heritage Consultation Requirements for Proponents (DECCW 2010).

3 ACTIONS TAKEN SINCE EXHIBITION

This section outlines the additional assessment undertaken to respond to the issues raised in the public agency submissions detailed in **Section 4**. In response to the key issues raised within the submissions, minor design refinements and clarifications have been made to the Project since public exhibition.

3.1 Further engagement

Following public exhibition of the SSDA, the University has undertaken further consultation with key public agencies as discussed below. A detailed summary of the consultation that has occurred and is provided at **Appendix B**.

3.1.1 *Transport for NSW*

A meeting was held with TfNSW on 20 May 2025 to discuss issues raised in its submission, notably:

- the proposed zebra crossing on Western Avenue and the potential for queuing of vehicles onto Parramatta Road
- impacts on sight lines resulting from the proposed bike box at the Parramatta Road/Western Avenue intersection
- proposed continuous footpath treatment along Parramatta Road raised by Council and which was not supported
- turning circles and swept paths for medium ridge vehicles (MRVs) turning left into the campus from Parramatta Road.

Arising from the meeting it was agreed that:

- further evidence would be provided by the University to demonstrate the safety and efficiency of the proposed zebra crossing and the bike box to confirm that there would be no negative impacts on traffic safety and efficiency as well as sight lines
- the University's traffic consultants, SCT Consulting, would undertake further modelling and swept path testing
- opportunities for improving seating amenity for the bus stop along Parramatta Road would be further investigated.

TfNSW subsequently requested that the University consider removing the vegetation and shifting the letters on the southwestern corner to improve driver visibility to pedestrians crossing Parramatta Road on the western side.

TfNSW have since provided the University a response confirming the acceptance of items such as the bike box and zebra crossing.

A detailed response to the issues raised by TfNSW in its submission and during consultation is provided in **Section 4**.

3.1.2 *City of Sydney*

A meeting was held with City of Sydney Council on 27 May 2025 to discuss the issues raised in Council's submission, particularly relating to:

- heritage and urban design issues, including fence and footpath treatment and design levels
- campus approach to end of trip facilities
- civil works being undertaken on Western Avenue which have been assessed in a separate Part 5 Review of Environmental Factors (REF)
- waste room size and configuration
- Council's view that the University should not be exempt from paying contributions under the City of Sydney Development Contributions Plan 2015.

Arising from the meeting it was agreed that:

- Council would issue a clarification regarding the need for further details on levels and gradients, including level sectional drawings for existing and proposed boundary levels
- the University would provide further information regarding capacity of existing end of trip facilities to cater to cyclists accessing the Teaching and Learning Hub
- the University would continue to liaise with Council regarding other issues, notably heritage and urban design comments.

Council subsequently requested that the University provide details of levels and gradients at all entry points that interact with the footpath and the carriageway of Parramatta Road to enable a clearer understanding about how the levels relate between the private and public areas, and to determine if there are any issues with accessible routes and overland flow/stormwater/flooding. (Refer **Appendix B** for further detail).

A further meeting was held on 21 July 2025 to discuss outstanding items from Council's submission and update Council on the University's deliberations regarding its proposal to remove the palisade fencing.

A detailed response to the issues raised by Council in its submission and during consultation is provided in **Section 4**.

3.1.3 Heritage NSW

The University has undertaken extensive and ongoing consultation with Heritage NSW since exhibition of the EIS, including the following:

- A formal written response to issues raised in the Heritage NSW submission was provided by the University on 11 April 2025
- The matter was referred to the meeting of the Approvals Committee of the Heritage Council of NSW held on 6 May 2025, and the University subsequently responded to matters raised at that meeting
- A meeting was held with Heritage NSW on 22 July 2025 to detail the results of the University's further work on heritage matters and Heritage NSW issued its feedback on 28 July 2025.

Details of all correspondence and meetings are provided at **Appendix B**.

In response to the initial submission by Heritage NSW and subsequent correspondence and meetings, additional work has been undertaken by the University including:

- an alternative option to removing the palisade fencing has been developed which incorporates discrete openings. An options analysis for the palisade fence prepared by Oculus (Landscape Architects) is included at **Appendix H**

- a Heritage Interpretation Plan has been drafted by Urbis (Heritage Consultant) to help inform how the removal of any heritage fabric can be interpreted within the design. This will be finalised in the next phase of the design
- a Tree Significance Assessment has been undertaken by TreeIQ (Landscape Heritage Consultant) provided in **Appendix E**
- further evidence in support of the conclusions regarding historical archaeology on the site has been provided, noting the multiple disturbances on site over a long period which indicate that there is a low likelihood of the air raid trenches remaining.

A detailed response to the issues raised by Heritage NSW in its submission and during consultation is provided in **Section 4**.

3.1.4 Conservation Programs, Heritage and Regulation Group (CPHR)

The University invited CPHR to meet to discuss issues raised in the Group's submission however CPHR advised that its preference was to communicate via email.

On 14 July 2025 the University provided a response to issues raised in CPHR's submission. CPHR responded on 25 July 2025, noting that the information provided by the University now describes previous analysis on site, relationship to the Council flood study and provides additional information on changes to flood hazard in localised areas. CPHR noted that other matters were still to be addressed. A detailed response to these matters and other issues raised by CPHR is provided in **Section 4**.

3.2 Additional impact assessment

In response to submissions received from agencies, the following additional impact assessment has been undertaken:

- Additional flood modelling and assessment has been prepared by GRC Hydro in response to the submissions from Council, SES and CPHR.. The amended FIRA is provided at **Appendix O** and the MUSIC modelling is provided at **Appendix G**.
- A Tree Significance Assessment has been prepared by Tree IQ (**Appendix E**)
- Further traffic assessment and swept paths analysis for medium ridge vehicles has been undertaken by SCT Consulting (**Appendix Q**)
- An options analysis for the palisade fence treatment has been prepared by Oculus (**Appendix H**) also outlined in the presentation slides to HNSW in Appendix S.

3.3 Refinements to the Project

The additional detailed work undertaken by the University since exhibition indicates that only minor amendments to the submitted plans are required as set out below.

The proposed design changes do not impact the proposed maximum gross floor area of 6,913m² and there are no proposed changes to other key metrics such as proposed land uses, building height, or vehicle access.

3.3.1 Level 2 Waste Room

In response to Council's submission, the waste room on Level 2 has been reconfigured and enlarged. The area of the waste room has been increased from 13m² to 18.3m² and the configuration has been modified, adding more space and allowing for improved manoeuvrability. To facilitate this modification,

a minor change has been made to the location of the male and all gender toilets but no other changes have been made. The existing and proposed waste room layout is shown in **Figure 1** below and revised architectural plan for Level 2 is included at **Appendix C**.

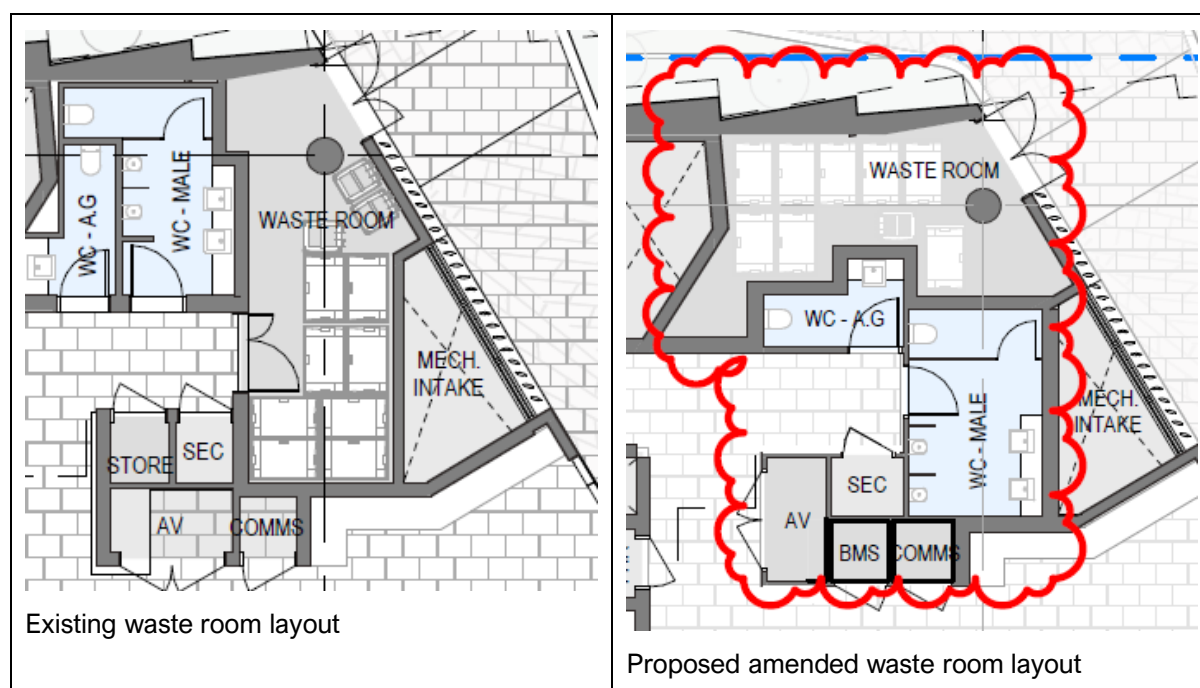


Figure 1: Existing and proposed waste room layout

3.3.2 Palisade fencing

In response to submissions received from both Council and Heritage NSW regarding the heritage significance of the palisade fencing along Parramatta Road, it is proposed to retain the fencing whilst providing for three discrete openings along the frontage. These openings are essential to:

- ensure the safety of pedestrians
- provide for better visual sight lines into and from the University
- allow for additional seating around the bus stop
- provide improved footpath gradients and width
- improve passive surveillance of the site.

The proposed alternative solution for the fencing is shown in **Figure 2** below and in the plans at **Appendix D**.

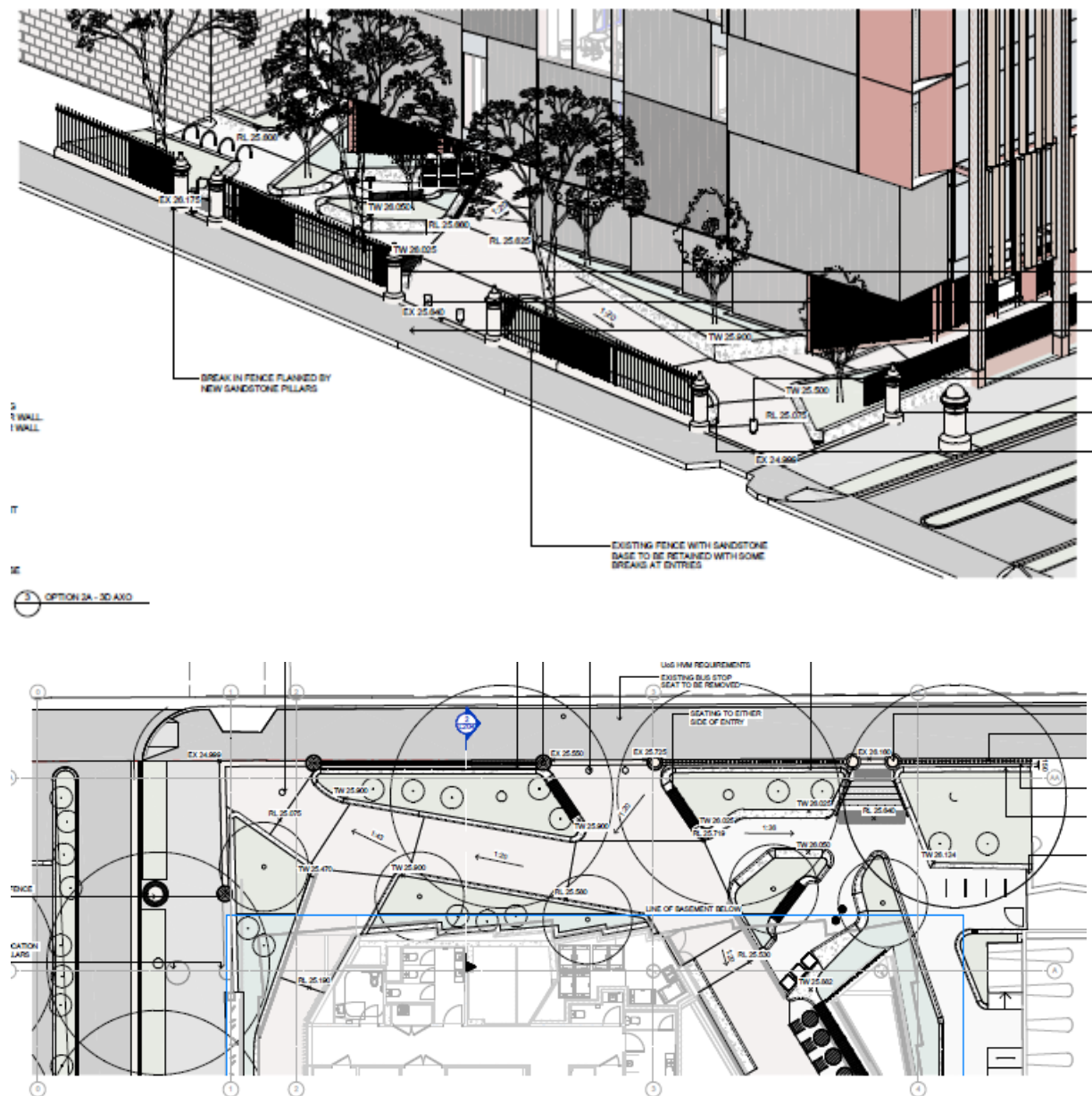


Figure 2: Plans of proposed amended fence treatment

4 RESPONSE TO SUBMISSIONS

4.1 Heritage NSW (Aboriginal Cultural)

Item	Category	Issue	Response
4.1.1	Archaeological Potential	Aboriginal Cultural Heritage Assessment (ACHA) concludes that the archaeological potential of the site is low, however Figure 23 in the report identifies two areas of moderate potential along western boundary.	The ACHA has been updated to confirm that the two areas of moderate potential along the western boundary are unlikely to impact previously undisturbed ground surface. The potential therefore remains low. Refer updated ACHA at Appendix F for further detail, including Section 7 <i>Conclusions & Recommendations</i> .
4.1.2	Admin - Registered Aboriginal Parties (RAPs)	Evidence of the following correspondence demonstrating consultation with Registered Aboriginal Parties (RAPs) in accordance with the Aboriginal Cultural Heritage Consultation Requirements for Proponents (DECCW 2010): a. Provision of the Project Information and Methodology to all RAPs b. Provision of the Draft ACHA to all RAPs.	Correspondence demonstrating consultation with Registered Aboriginal Parties (RAPs) in accordance with the Aboriginal Cultural Heritage Consultation Requirements for Proponents (DECCW 2010) for the provision of the Project Information and Methodology to all RAPs and the provision of the Draft ACHA to all RAPs was conducted as shown in the attached updated ACHA, Appendix F . Please refer to Appendix C in the ACHA for Registered Aboriginal Party Consultation Documentation.

4.2 Ausgrid

Item	Category	Issue	Response
4.2.1	Communication Services	Ausgrid requires that due consideration be given to the compatibility of proposed development with existing Ausgrid infrastructure.	Noted. Refer EIS Appendix N Electrical Services Infrastructure Report, Section 2.3 Proposed Electrical Services and 2.4 Proposed Communication Services which outline the compatibility of the proposed development with the existing infrastructure.
4.2.2	Ausgrid Connection Application	Any new connections and load requirements to the site must be discussed directly with Ausgrid and a connection application submitted to Ausgrid as soon as practicable.	Noted. An application for connection has been submitted to Ausgrid as noted in the Electrical Services Infrastructure Report, Section 2.3 Proposed Electrical Services, Appendix N of the EIS. The connection offer is appended to Appendix I of the Electrical Services Infrastructure Report. A copy has been attached to this response to submission – Appendix I .

Item	Category	Issue	Response
4.2.3	Ausgrid Underground Cables are in the vicinity of the development.	Special care should be taken to ensure that driveways and any other construction activities do not interfere with existing underground cables located in the footpath or adjacent roadways. It is recommended that the developer locate and record the depth of all known underground services prior to any excavation in the area. Information regarding the position of cables along footpaths and roadways can be obtained by contacting Before You Dig Australia (BYDA)	Please refer to the Appendix B of Electrical Services Infrastructure Report (Appendix N of EIS). An inground services survey has been undertaken to locate all relevant cables and services underground. Prior to any works on site, the contractor will be required to undertake a more detailed survey.
4.2.4	Ausgrid Underground Cables are in the vicinity of the development.	The proponent should refer to the following documents to support safety in design and construction: SafeWork Australia – Excavation Code of Practice. Ausgrid’s Network Standard NS156 which outlines the minimum requirements for working around Ausgrid’s underground cables. The following points should also be taken into consideration. ▪ Ausgrid cannot guarantee the depth of cables due to possible changes in ground levels from previous activities after the cables were installed. ▪ Should ground levels change above Ausgrid’s underground cables in areas such as footpaths and driveways, Ausgrid must be notified, and written approval provided prior to the works commencing. ▪ Should ground anchors be required in the vicinity of Ausgrid underground cables, the anchors must not be installed within 300mm of any cable, and the anchors must not pass over the top of any cable.	All documents are included as part of the Dial Before You Dig (refer Electrical Services Infrastructure Report, Appendix N of EIS).

Item	Category	Issue	Response
4.2.5	Ausgrid Overhead Powerlines are in the vicinity of the development.	The developer should refer to SafeWork NSW Document – Work Near Overhead Powerlines: Code of Practice. The “as constructed” minimum clearances to the mains must also be maintained as outlined in the Ausgrid Network Standard, NS220 Overhead Design Manual. It is the responsibility of the developer to verify and maintain minimum clearances onsite or relocate Ausgrid at the developer’s cost.	The contractor will operate within the Safe Work NSW Standards and will provide detailed Safe Work Method Statements to demonstrate how they will operate the construction site in relation to any overhead powerlines.
4.2.6	New Driveways - Proximity to Existing Poles	Proposed driveways shall be located to maintain a minimum clearance of 1.5m from the nearest face of the pole to any part of the driveway, including the layback, this is to allow room for future pole replacements. Ausgrid should be further consulted for any deviation to this distance.	The existing poles are located along Parramatta Road. There are no proposals to create new driveways on this road.
4.2.7	New or modified connection	To apply to connect or modify a connection for a residential or commercial premises. Ausgrid recommends the proponent to engage an Accredited Service Provider and submit a connection application to Ausgrid as soon as practicable.	An application for connection has been submitted to Ausgrid by an Accredited Service Provider (ASP) with a return offer letter by Ausgrid. Please refer to Appendix I for a copy of the application and connection offer.

4.3 City of Sydney

Item	Category	Issue	Response
4.3.1	Heritage Pillars and Gates	The existing heritage listed sandstone gate pillars and wrought iron gates of the Ross Street Gates should be conserved as part of the relocation works. The extent of removal of the heritage listed palisade fencing will have an adverse impact on the heritage significance of the item and is not supported, noting: i) The university is a heritage cultural landscape containing buildings of exceptional individual value set within a designed landscape with large areas enclosed by a historic fence.	<u>Gates pillars and wrought iron gates</u> The gate pillars and wrought iron gates will be conserved as part of the relocation works. Prior to the commencement of construction, a Schedule of Conservation Works will be prepared for the sandstone pillars/gates by a suitably qualified and experienced heritage consultant, to be executed as part of the approved works. In addition, a Photographic Archival Recording will be undertaken of the gates (and palisade fence) in accordance with the Heritage NSW Guidelines for ‘Photographic Recording of Heritage Items Using Film or Digital Capture’. <u>Palisade fencing</u> In response to requests by both Council and Heritage NSW, the University explored other fence options, as discussed below in Section 4.6 below. The

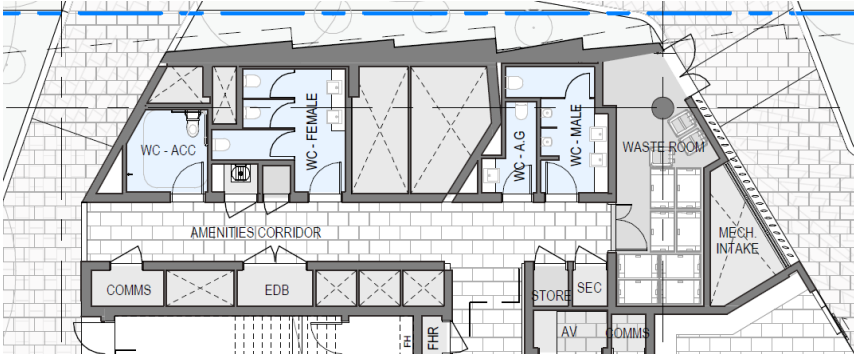
Item	Category	Issue	Response
		ii) The approved Campus Improvement Plan did not include removal of the fence (whereas the gate pillars were shown to be relocated) – refer to drawings SSD- F011 and F012. iii) The proposed mitigation for the loss of the fence by interpreting the alignment of the fence to Parramatta Road, with flush sandstone inlay evoking the sandstone base, and to salvage the sandstone base and ironwork for maintenance and repair of the remainder of the fence, does not adequately mitigate the adverse impact on the significance of the fencing caused by the proposed removal. It is recommended that only sections of the fencing be removed to created new openings tying in with the new internal paths, rather than removing the whole section of fencing fronting the teaching and learning hub. The removed sections may then be incorporated within the landscape design (refer to additional urban design and landscaping comments below).	University still considers that removing the 40m portion of the palisade fence would provide for a more cohesive urban design and public domain solution, due to the pedestrian traffic and accessibility benefits and outcomes. However, recognising the concerns raised by Council and Heritage NSW regarding the heritage significance of the fence, the University has amended the design documentation to retain the fencing but with three discrete openings: (1) at the north-western corner of the building adjacent to the Western Avenue/Parramatta Road intersection; (2) adjacent to the bus stop and (3) an eastern opening to facilitate access between the subject building and the FASS building. The additional options analysis for the palisade fence has been undertaken by Oculus (Landscape Architects) provided in Appendix H and the updated landscape drawing set is included in Appendix D. The proposed openings in the fence as shown on the amended design, are considered essential to: - ensure the safety of pedestrians - provide for better visual sight lines into and from the University - allow for additional seating around the bus stop - provide improved footpath gradients and width - improve passive surveillance of the site. It is considered that the amended design addresses Council's concerns regarding the fence treatment.
4.3.2	Urban Design - Removal of Palisade fence	The removal of the heritage listed palisade fencing along Parramatta Road is not supported from an urban design perspective. The proposed development includes a landscaped setback along the Parramatta Road frontage to create a more permeable entry, however, the proposed northern elevation of the building presents as a blank frontage at the ground plane. The removal of the fencing and creation of multiple pathway entries interspersed between landscaping does not improve	Refer discussion above. The design has now been amended to retain the palisade fencing and incorporate discrete openings. The amended design aims to conserve the heritage significance of the fence while facilitating visual and physical access and improving the safety and amenity of the bus stop. Sandstone pillars are proposed either side of each opening to integrate with the historic design of the fencing. One concrete bollard at the western opening and two bollards at the central opening are proposed to mitigate hostile vehicle entry to the site. The bollards are small and will not detract from the overall appearance of the fence.

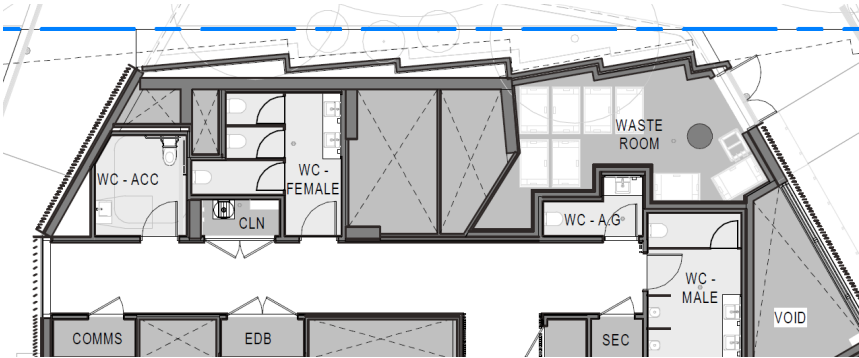
Item	Category	Issue	Response
		the access to the proposed building. In doing so the heritage edge and its significance is lost. The Design Excellence and Review Committee also raised concerns regarding the removal of the fencing as measures would then be required to prevent people running across Parramatta Road. The removal of the fencing also requires the introduction of hostile vehicle defence measures further detracting from the design intent.	Transport for NSW has indicated its support for opening up the fence adjacent to the bus stop to improve pedestrian safety and functionality of the space. No concerns have been raised with respect to pedestrians running across Parramatta Road. It is considered that the amended design with the narrower openings and bollards will reduce risks of pedestrians crossing Parramatta Road in this location.
4.3.3	Urban design - Wind	The submitted wind report indicates a number of locations failing the relevant comfort and safety criteria. The wind report outlines that wind mitigation will be dealt with through further design development. This detail should be provided as part of the application to confirm the implications for the design of the building and public domain. It is noted that the ground level diagram used in the wind report is outdated and should be updated.	The submitted wind report was a draft only and inadvertently lodged as part of the SSDA submission. The issues raised in the draft wind report had been addressed by the project team with minor modifications made to the western façade to enable the wind tunnel testing to pass. These modifications are as per the design that is part of this submission. The updated Pedestrian Wind Environment Study included at Appendix J is the final version and confirms that the design meets relevant criteria.
4.3.4	Landscaping and Tree Canopy	The proposed tree removal and replacement canopy tree plantings are generally supported. The recommendations of the submitted Arboricultural Impact Assessment (AIA) must be adhered to, including recommended sensitive construction methodologies. The proposed replacement canopy tree plantings are listed within the City's recommended Tree Species List except for <i>Acacia implexa</i> (Hickory Wattle). It is recommended the site arborist review this species to confirm its tolerance for recommended planting sites. Deep soil should be shown on the plans to ensure the proposed tree planting locations have adequate soil volumes to support these trees for the long term.	The project arborist, Tree IQ, will be engaged for the entire project and tree protection measures will be adopted as per the recommendations in the AIA. The suitability of <i>Acacia implexa</i> will be discussed with the project arborist (TreeIQ). Deep soil areas and soil volumes of planters are shown on the updated landscape planting plans (refer Appendix D).

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4.3.5	Public Design - Stormwater	A MUSIC link report is required to be submitted accompanying a stormwater quality assessment report prior to determination of the application. Council has adopted a MUSIC link for assessing Water Sensitive Urban Design (WSUD) compliance for developments. A stormwater quality assessment for the proposed development must comply with the City's specific modelling parameters, as adopted in MUSIClink. The proposed WSUD shall align with the latest submitted architectural, stormwater and landscape design and shall be supported by a schematic representation of a treatment train and the relevant catchment areas used for design.	The proposed Water Sensitive Urban Design (WSUD) approach aligns with the City's specific modelling parameters. Please refer to Appendix G for the MUSIC Link report and model for further detail.
4.3.6	Public Design - Footpath	It is recommended that a continuous footpath treatment (CFT) be provided along the Parramatta Road frontage. The proponent should seek support and approval from TfNSW for a CFT with traffic lights to the Parramatta Road at the site. The City would only be able to support the proposed deletion of the refuge island if a CFT can be included in the scope of works. If a CFT will not be supported by TfNSW then the traffic design must include a refuge island extension for pedestrian when crossing Western Avenue along the Parramatta Road footpath. The lantern controlled pedestrian crossing must comply with accessibility requirements. Notwithstanding the issues raised above (refer to heritage heading), the proposed removal of the palisade fencing along the boundary would damage the existing footpath along Parramatta Road. The proponent must be required to resurface the footpath	TfNSW have advised it does not support a Continuous Footpath Treatment (CFT) at the Western Avenue entry. The existing curb that is proposed to be removed (in the middle of the existing pedestrian crossing across Western Ave) is not a refuge island. As per the Sydney Streets Design Code: - pedestrian refuge islands offer pedestrians opportunities to cross roads in a staged manner - They are typically used when a street is very wide or when the crossing time is too long - the pedestrian refuge islands should be accessible and safe to wheelchair users and people with prams, which is not the case in this instance. Having regard to the above, there is insufficient space to install a pedestrian refuge. It is also noted that there are various precedents in the surrounding locality and within the City of Sydney LGA that do not have a pedestrian refuge, of intersections that are greater in width.

Item	Category	Issue	Response
		to City standards and requirements as part of the public domain works. Existing levels, particularly around the bus stop require improvements to achieve compliant grades.	It is no longer proposed to remove the palisade fencing. Partial retention of the existing fence will prevent the optimum grading of the area due to the existing RL of the fence plinth.
4.3.7	Public Design – Levels and Gradients	Public domain levels and gradients of the new interface with Parramatta Road are to be submitted for review. Sections through the centre line of each proposed connection with the public domain/footpath along the Parramatta Road frontage are required. The sections must include the existing and proposed boundary levels, top of the kerb and invert of gutter levels and be extended for a minimum of 2.0 m internally or up to the required FPL (flood planning level). If a continuous footpath treatment (CFT) at the entry to Western Avenue is accepted by TfNSW, a long section through CFT is required and shall be taken from the proposed path (fronting the new building) to the footpath across Western Avenue.	Following the meeting with Council on 27 May 2025, Council issued a clarification on the Levels and Gradient submission as follows: <i>The levels and gradients are requested at all entry points that interact with the footpath and the carriageway of Parramatta Road to enable a clearer understanding about how the levels relate between the private and public areas, and to determine if there are any issues with accessible routes and overland flow/stormwater/flooding.</i> Council provided sample drawings of cross and longitudinal sections to demonstrate how levels should be identified (refer Appendix B for further detail). The works for the A01 Ross Street Teaching & Learning Hub do not extend to the footpath or road reserve of Parramatta Road. Design levels have been matched to the existing boundary levels as indicated in the current survey. The detailed drawings requested by Council for the levels and gradient are more advanced than the project is currently. The University will provide this level of detailed documentation for Council's review, once the contractor has been engaged. Council has advised that this is satisfactory and addresses its concerns.
4.3.8	Public Design - Flooding	It is noted that the site is subject to flooding. The proposed flood planning levels have been reviewed and are supported. The submitted Flood Impact and Risk Assessment prepared by GRC Hydro is required to be complied with and must be referenced in the conditions of consent should consent be granted.	Noted.
4.3.9	Access and Transport	It is acknowledged that the university takes a campus wide approach to providing bicycle parking and end-of-trip facilities for staff and students. The proposed teaching and learning spaces, with ancillary food and	Cyclist facilities in the A01 Ross St Teaching & Learning Hub are not warranted given the nature of the building use and the provision of end of trip and bike parking in the adjoining A02 FASS building.

Item	Category	Issue	Response
		beverage offering, do not provide dedicated bicycle parking and end-of-trip facilities within the building. Further analysis should be provided to demonstrate that sufficient bicycle parking and end-of-trip facilities are provided on campus, and within accessible locations to the teaching and learning hub. Access to bicycle parking and end-of-trip facilities should be simplified to encourage usership. Improvements to pedestrian and cyclist access through the site are supported. The introduction of a bicycle lane and bicycle box on Western Avenue approaching the intersection of Parramatta Road are supported notwithstanding these works are proposed to be subject to a separate Part 5 approval process.	The proposed A01 building is intended for shorter stays compared to faculty owned buildings. Students are expected to remain at this building for the duration of their class or use the informal learning spaces for some of the day but will use parking and end-of-trip (EOT) facilities at faculty-specific buildings. The adjacent buildings have end-of-trip facilities which can be used by the A01 population. In addition there are multiple other EOT facilities in close proximity and across the campus. The University's campus wide approach provides larger, central facilities and amenities to users across the campus rather than every building having its own small facility. Therefore, this new building will not contain EOT provisions; however, the neighbouring building (the FASS building, refer Figure 1) has EOT facilities that will be open to all.  The project is pursuing a 5 star Green Star Buildings certification and as part of this process it is a minimum expectation to meet Credit 27 – Movement and Place. A01 and A02 have a combined number of staff of 692. To comply with the Minimum Expectation for EOT provisions, the combined occupancy of both buildings would require 7 showers and 293 lockers to be

Item	Category	Issue	Response												
			provided, as shown in the table below. As the building is Class 9, the requirements are only applicable to staff, per the Green Star Buildings Submission Guidelines. <table border="1"> <thead> <tr> <th colspan="2">Green Star min requirement</th><th colspan="2">A02 FASS provisions</th></tr> <tr> <th>Showers</th><th>Lockers</th><th>Showers</th><th>Lockers</th></tr> </thead> <tbody> <tr> <td>7</td><td>293</td><td>16</td><td>504</td></tr> </tbody> </table> As shown in the table, the A02 FASS building provides a significantly higher number of showers and bike lockers than is required for staff. This credit's minimum expectations have been met and accepted by Green Building Council of Australia. The University also proposes to provide additional signage to direct cyclists the existing EOT facilities. Refer to Appendix K for a site plan showing all EOTs on campus and Appendix L for additional drawings showing existing A02 End of Trip facilities.	Green Star min requirement		A02 FASS provisions		Showers	Lockers	Showers	Lockers	7	293	16	504
Green Star min requirement		A02 FASS provisions													
Showers	Lockers	Showers	Lockers												
7	293	16	504												
4.3.10	Cleansing and Waste	The proposed waste storage room is undersized for the amount of waste calculated to be generated and would not allow for sufficient manoeuvrability. The waste storage room should be redesigned to provide sufficient space.	In response to Council's comments, the waste room has been reconfigured and enlarged. The area of the waste room has been increased from 13m² to 18.3m² and the configuration has been modified, adding more space and allowing for improved manoeuvrability (refer plans below). No additional GFA has been added. Before: 												

Item	Category	Issue	Response
			After:  Please refer to Appendix C for the updated architectural drawing and Appendix M for the updated Waste Management Plan.
4.3.11	Contributions	The proposed development is subject to the City of Sydney Development Contributions Plan 2015. The plan has been approved by the NSW Government and does not exempt crown development from the requirement to pay contributions. The City notes that the contributions payable may be reduced in accordance with Planning Circular 6 whereby the contributions for drainage and local roads remain relevant.	The EIS provides a detailed justification in support of the University's view that it should be exempt from paying contributions. Council does not consider that the proposal meets the criteria for exclusion and has requested payment of contributions in accordance with its Development Contributions Plan. Council noted Circular D6 and advised that development contributions should be levied, particularly for drainage and roads as the development would have an impact on Council's broader infrastructure and services. Council did not request affordable housing contributions. The Project does not increase the demand for the categories of public facilities and services addressed by the City of Sydney Development Contributions Plan. Further, Planning circular PS 25-002: Crown development applications, Local Infrastructure Contributions Practice Note – Exempting certain development from contributions and Conditions of Consent does not support the imposition of a levy relating to Crown developments, specifically educational services. It states that educational facilities should not be levied contributions for open space, community facilities, parking and general local / main road upgrades, but can be levied in relation to direct drainage infrastructure requirements or local traffic management at the site entrance, if required. In this regard:

Item	Category	Issue	Response
			- the Project does not require any external traffic improvements for the development and the internal improvements for access form part of the development. - the Project would not generate any additional demand on Council's stormwater infrastructure to be funded in its Development Contributions Plan (upgrades to the Sheas Creek catchment and Munni Street catchment in the south precinct). The proposed development drains to the Johnstons Creek stormwater catchment area and the University provides various open space and community facilities within the campus that do not rely on access through the area supported by the stormwater infrastructure improvements. Therefore, there is no justification to levy the Applicant for the drainage works funded in Council's Contributions Plan. - There is no nexus to the contributions being levied pursuant to the Development Contributions Plan as the University provides local and community facilities that are accessible to the public and therefore provides a material public benefit and is self-sufficient in regard to open space and community facilities. - the University of Sydney is a not-for-profit institution that relies on grants, donations and external funding to provide new community facilities for the University and wider community, and is a registered charity, per the definitions of Council's Development Contributions Plan - the University is a public authority and not a private developer and would provide a public benefit, including new pedestrian linkages, and public bus stop seating within University owned land - it is unreasonable for the University to pay contributions which will affect the delivery of new teaching and learning facility that would provide improved educational outcomes for the wider community Accordingly, having regard to Circular D6, the University considers that a levy for development contributions should not be imposed on the Project. The University also states that an affordable housing contribution would be unreasonable as the project is for a teaching and learning within a University and would not impact on the availability of affordable housing or result in a need for

Item	Category	Issue	Response
			affordable housing, and as such the project does not meet the criteria under section 7.32 of the EP&A Act, which sets out when contributions for affordable housing should be collected. It should be noted that obtaining a full exemption from the payment of any and all development contributions for this project would be consistent with the Department's consideration of and exemption of the recent Sydney Biomedical Accelerator and Susan Wakil Health Building SSDA's from payment of development contributions.

4.4 Civil Aviation Safety Authority

Item	Category	Issue	Response
4.4.1	Aviation	CASA has no issues with the Aviation Impact Assessment. Notwithstanding that CASA is not an Approval Authority, CASA does not object to the Proposal. The proposed structure will not be a risk to Aviation Safety.	Noted.

4.5 Fire and Rescue NSW

Item	Category	Issue	Response
4.5.1	Fire	FRNSW have reviewed the EIS with particular focus to Section 1 and 3, along with the Preliminary Hazards Analysis (PHA). FRNSW submit no comments or recommendations for consideration, nor any requirements beyond that specified by applicable legislation at this stage.	Following exhibition, the University submitted a Performance-Based Design Brief (PBDB) to Fire & Rescue NSW and received feedback. The University has since addressed the comments through an updated Performance Based Design Brief (PBDB). Fire and Rescue NSW have provided in principle support subject to the analysis in the FER demonstrating compliance with the performance requirements of the NCC. The Performance Based Design Brief Consultation document is provided at Appendix N.

4.6 Heritage NSW

Item	Category	Issue	Response
4.6.1	Visual Impact	While it is noted that the concept building envelope for the project was approved as a part of SSD-6123, Heritage NSW remains concerned about the overall bulk and scale of the development, particularly when considered in conjunction with the future development of the A03 Building. Heritage NSW requests the inclusion of a detailed cumulative visual impact assessment as a part of the Heritage Impact Statement (HIS) to better demonstrate the visual impact of the proposed works as a part of the Campus Improvement Program. The HIS states that the design of the building responds to the nearby R.D. Watt building by incorporating appropriate setbacks and material finishes. Given the proximity of the proposed works to the R.D. Watt building, a more detailed visual analysis is warranted to more clearly demonstrate the relationship of the two structures, provide a clearer understanding of the scale of the development in relation to the R.D. Watt Building, and show how the architectural treatment responds to surrounding heritage fabric.	The Campus Improvement Program (CIP) SSD-6123 which was approved includes building envelopes (i.e. scale and bulk) for the A01 site, and as such, this is not a relevant consideration for the current SSD which is limited to building design. Furthermore, the proposed design for the A01 Ross Street Teaching & Learning Hub does not deviate from the CIP SSD Approval. A visual analysis has been completed for the project, using the same views as the CIP SSD-6123 application in the Visual Impact Assessment - please refer to Appendix U of EIS. As discussed in the HIS, the proposed building has been developed with careful consideration of the adjacent R D Watt Building, while also being cognisant of the significant thoroughfare and vista of Science Road, and the strong street boundary of this element. Given the topography of Science Road, and the height of R D Watt, the Project is similar in overall scale and thus, will not impinge on views to the principal (Science Road) frontage of the building. The relationship between the Project and the R D Watt building has been enhanced by the following design features: - Physical and visual separation between the two structures, to create an independence when viewed from Science Road. The proposed courtyard and pedestrian link between the buildings create an informal space and enhances views of the western façade of the R.D Watt building. - Creation of a new pedestrian viewpoint to R.D Watt through the realignment of Science Road, and creation of a wider footpath in this area.

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			▪ The architectural treatment of the building has used both considered form and materiality to complement the adjacent R.D. Watt building, and to reduce its potential visual impact. ▪ The building pulls back from the eastern boundary as approved under the CIP to enhance views to the western façade of R.D Watt, and to create a courtyard space in which to appreciate the building. It also provides for a physical setback between the buildings, maintaining separation and dominance of R.D Watt when looking west down Science Road. It is reiterated that this is an additional setback, reducing the total footprint of the building as approved under the CIP which results in a positive heritage outcome for R.D Watt. ▪ The inclusion of three-storey picture windows on the south-east and southwest corners of the building have been purposefully designed to capture and reflect the historic buildings (R.D Watt and J.D Stewart respectively) that surround the site. They provide sight lines to these structures. ▪ Materially, the Project adopts a curated palette of pleated and textured brick, metal and glazing, in a palette of warm reds, creams and sandstone colours. This has been developed in direct response to R.D Watt, a significant red brick building with sandstone dressings and is explored in detail in the Design Report prepared by BVN. Overall, the high quality, contemporary design of the Ross Street building will contribute to the emerging character of the Life Sciences precinct, which balances new, contemporary built form, with significant masonry structures and landscape.
4.6.2	Ross Street gates and palisade fencing	The proposed removal of a 40m section of heritage fencing along the boundary of the site with Parramatta Road is of concern, as these works would remove significant heritage	<u>Palisade fencing</u> The intention of removing 40m of the fencing, as set out in the EIS, was specifically responding to the objectives in the CIP SSD-6123

Item	Category	Issue	Response
		fabric and diminish the prominence of this entry point to the campus. The HIS notes that the proposed works are to facilitate pedestrian access and provides an assessment of the impact of the works in the broader context of the campus but does not provide a strong justification of the need for the proposed works, or an analysis of options considered which may avoid or minimise the removal of the heritage fencing and gates.	aimed at improving permeability, pedestrian safety and amenity. Access points from Parramatta Road for both vehicles and people have narrow pedestrian entrances, causing serious and ongoing safety issues. Further, the bus stop immediately outside the site is ranked the worst bus stop in Sydney due to its constraints and limited space to queue (refer article in Sydney Morning Herald - https://www.smh.com.au/national/nsw/revealed-sydney-s-worst-bus-stops-and-why-they-are-a-health-hazard-20240229-p5f8r4.html). The removal of a portion of the palisade fence was considered by the University to provide for a more cohesive urban design and public domain solution, due to the pedestrian traffic and accessibility benefits and outcomes. However, since public exhibition detailed consultation has been undertaken with Heritage NSW and Council regarding the treatment of the palisade fencing. In response to concerns, the University requested the Project's Landscape Architect, Oculus, to undertake an options analysis for the fence. The purpose of the analysis was to consider alternative solutions that protect the heritage significance of the fence but also improve pedestrian safety, permeability and amenity along the Project's frontage to Parramatta Road. This options analysis is included at Appendix H. Based on the Oculus analysis, the University has amended the design documentation to retain the fencing but with three discrete openings: (1) at the north-western corner of the building adjacent to the Western Avenue/Parramatta Road intersection; (2) adjacent to the bus stop and (3) an eastern opening to facilitate access between the subject building and the FASS building. The proposed openings in the fence as shown on the amended design, are considered essential to: ▪ ensure the safety of pedestrians

Item	Category	Issue	Response
			- provide for better visual sight lines into and from the University - allow for additional seating around the bus stop - provide improved footpath gradients and width - improve passive surveillance of the site. It is considered that the amended design provides an appropriate balance between needing to protect the heritage significance of the fence while improving pedestrian safety. In response to the amended design, Heritage NSW advised as follows: <i>As noted, the Approvals Committee has determined that it does not support the removal of fencing along Parramatta Road, however options for discrete openings in the fence could be considered as a part of the project design.</i> The amended design provides for discrete openings. <i>Option 3 as presented would not be consistent with this advice.</i> This option has been discounted by the University <i>Option 2A as presented would retain approximately 30m of the 40m frontage along Parramatta Road with new openings made for pedestrian access. This option would be more consistent with advice received from the Approvals Committee.</i> Option 2A is the University's preferred option. <i>Heritage NSW recommends that new openings in the fence should be minimised where possible, and that consideration should be given to removing the proposed opening toward the eastern extent of the development.</i> The opening toward the eastern extent of the development will assist with the bottle neck around the bus stop. The opening immediately adjacent the bus stop serves as a pedestrian entrance and as additional seating for the bus stop and will be

Item	Category	Issue	Response
			busy at peak times. The eastern opening will help ease congestion if there are people queuing at the bus stop area. The University considers that the eastern entrance is integral to improving pedestrian permeability. It is a discrete entry point which will not disrupt the overall appearance of the fence and should be supported. ▪ <i>Consideration should also be given to revising the design of the new openings, as sandstone pillars may not be appropriate at minor entrances. Revised options may include wrought iron end posts which are less prominent, and more suitable for minor entrances.</i> The sandstone pillars were designed in consultation with Urbis (Heritage Consultant) as part of the draft heritage interpretation strategy. This built form interpretation allows for the character of the fence to be retained while allowing for the additional openings as required to improve access and movement in this area. The design of the fence openings and the details of the edges will be further reviewed in the next design phase.
4.6.3	Western Avenue and Science Road landscaping works	Five trees proposed for removal (identified as T766 and T768-T772 in Appendix R of the EIS) are identified as exceptionally significant in The University of Sydney Grounds Conservation Management Plan (Clive Lucas, Stapleton and Partners, 2019). Impacts related to the removal of these trees have not been assessed as a part of the HIS. The existing guard house on Western Avenue is proposed for removal. Section 3.1 of the Environmental Impact Statement (EIS) states that the guardhouse is a demountable building, and therefore approved for relocation under SSD-6123. Based on a visual assessment, the structure does not appear to be a demountable and its removal has not been considered as a part of the HIS.	Tree IQ was engaged by the University to review the heritage significance of the trees in question, which comprise five of the seven <i>Casuarina glauca</i> (Swamp She-Oak) proposed for removal (refer Tree IQ report at Appendix E). The Tree IQ assessment found that: The removal of the seven <i>Casuarina glauca</i> is assessed as having a minor adverse impact on the heritage landscape. This conclusion is based on: ▪ The trees confirmed post-1982 planting date and limited association with any significant landscape phase ▪ Their moderate landscape contribution and arboriculturally compromised form, and

Item	Category	Issue	Response
			The opportunity for replacement planting that could more appropriately reflect the site's historic character or contemporary campus values. Given the above, Tree IQ concludes that the removal of the <i>Casuarina glauca</i> is considered justifiable on heritage grounds. The Guard House is of No Significance, and is a later (post 1960s) structure, likely constructed as part of the Western Avenue Road and landscaping works (c.1969, see Grounds CMP). Urbis has advised that there will be no heritage impact resulting from its removal (refer Appendix B).
4.6.4	Heritage Interpretation	Condition B14 of development consent SSD-6123-Mod-2 states that 'all future development applications for new built form that involve the demolition or alteration of existing items of heritage significance shall include a heritage interpretation plan'. Heritage NSW considers that the proposed relocation of the Ross Street Gates and removal of a section of the heritage stone and metal fence are both examples of demolition to an existing item of heritage significance and would therefore warrant the preparation of a Heritage Interpretation Plan (HIP). Noting Recommendation 2 of the Historical Archaeological Impact Assessment (HAIA), the HIP should include discussion of how any potential archaeological remains may be incorporated in the development (if identified).	As requested by Heritage NSW, the University has engaged Urbis to prepare a Heritage Interpretation Plan to satisfy Condition B14 for the Ross Street Gates and Fencing. It is proposed that the Heritage Interpretation Plan will be developed during the detailed design in consultation with Heritage NSW prior to commencement of works.
4.6.5	Historical archaeology	The HAIA identifies high potential for archaeological deposits associated with Phase 3 of the site's use, consisting of air raid trenches excavated during WWII and the construction of the Transient Building. Construction of the Transient Building in 1945 would likely have required limited excavation to lay brick plinth footings. Intact archaeological deposits associated with Phase 3 are likely to be of local significance.	Detailed consultation with Heritage NSW regarding historical archaeology was undertaken following exhibition. Additional evidence indicating extensive disturbance of the site was provided which indicates that there is Low potential for intact remains which would be likely to qualify as relics of local or State significance on the site (refer Urbis advice at Appendix B).

Item	Category	Issue	Response
		Section 5.3 of the HAIA states that it is unlikely that remains from Phase 3 would be present with sufficient intactness to be assessed as locally significant. Based on the information provided in the background and physical assessment of the HAIA, Heritage NSW does not consider that this statement is supported. There are also noted inconsistencies between recommendations provided in the HAIA and the proposed mitigation measures outlined in the EIS. For example, the HAIA concludes that no further archaeological investigation is required and recommends use of an unexpected finds procedure to manage archaeology while the mitigation measures in the EIS state that archaeological monitoring will be undertaken. Based on the information provided in the EIS, HNSW considers further archaeological investigation would be appropriate.	In response to discussions and the additional information provided, Heritage NSW by email dated 28 July 2025 advised as follows: ▪ <i>Additional information provided regarding disturbance noted, including mapping of service trenching and identification of previous excavation in the south-west corner of the site for a basement level.</i> ▪ <i>Excavation of a basement level over part of the site would remove archaeological potential within its footprint.</i> ▪ <i>It is noted that many of the disturbances described would consist of relatively shallow impacts, with deeper disturbance in isolated areas. Given the potential depth of features associated with World War II air raid trenches, it is considered that there is the potential for archaeology associated with these trenches to remain intact and interpretable within the site.</i> ▪ <i>Intact cut and fill deposits associated with World War II air raid trenches would be of historical significance at a local level and have the potential to contribute to the interpretation of the site as a part of the project, and it would be appropriate for these features to be recorded prior to removal</i> It is therefore considered that the HAIA provides an appropriate assessment of the historical archaeological impact and that the mitigation measures in the HAIA are appropriate. No further action is required.
4.6.6		At this point Heritage NSW cannot undertake a full assessment of the EIS and requests the following additional information to enable assessment of whether the Environmental Impact Statement fulfils the Secretary's Environmental Assessment Requirements by 11 April 2025: 1. An updated Heritage Impact Statement which includes:	As answered above.

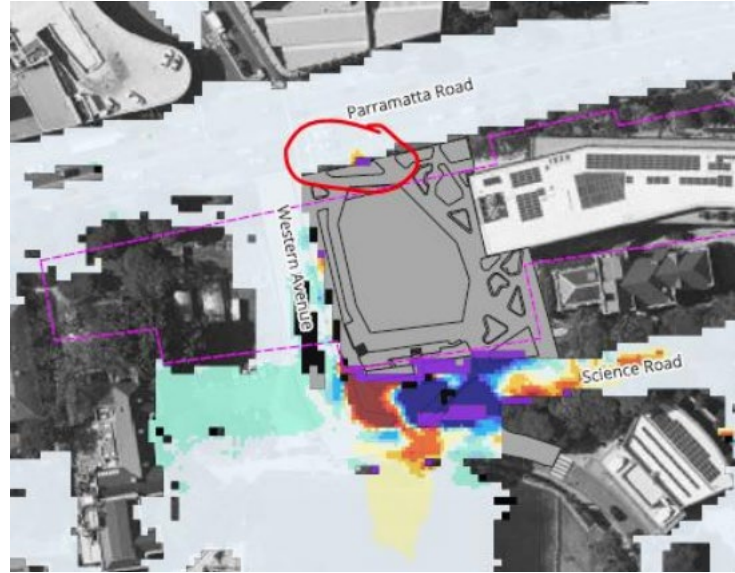
Item	Category	Issue	Response
		a. A detailed cumulative impact assessment to better demonstrate the visual impact of the proposed works as a part of the Campus Improvement Program. b. A detailed visual analysis of the proposed works in relation to the R.D. Watt building to better demonstrate the relationship between the two structures, scale of the development, and architectural treatment. This could be supported by additional elevations and/or photomontages of the site. c. Clear justification for the removal of this section of the heritage sandstone and wrought iron fencing, including consideration and analysis of alternatives considered to the proposed removal of fencing which would minimise or avoid this heritage impact. d. An assessment of heritage impact to significant vegetation. e. Identification of whether the guard house on Western Avenue is significant, with reference to Policy 10 of The University of Sydney Grounds Conservation Management Plan (Clive Lucas, Stapleton and Partners, 2019), and an assessment of heritage impact as appropriate.	
4.6.7		A Heritage Interpretation Plan should be prepared to comply with the Condition B14 of development consent SSD-6123-Mod-2.	As answered above
4.6.8		An updated Historical Archaeological Impact Assessment and an Archaeological Research Design (ARD) is required, providing a methodology for archaeological monitoring as outlined in the mitigation measures provided in the EIS. The ARD is to be completed in accordance with the guideline Archaeological Assessments (Heritage Office and DUAP 1996), and should: a. Identify the potential archaeological resource on site, and how it will be impacted by the proposed works.	As answered above

Item	Category	Issue	Response
		b. Identify research questions to guide the archaeological program. c. Justify the proposed approach to investigation. d. Propose a methodology for archaeological investigations on site. e. Outline triggers for the completion of other mitigation measures following archaeological monitoring, such as salvage excavations. f. Provide an unexpected finds procedure for the proposed works. g. Consider the inclusion of an artefact discard policy and procedure. h. Provide a methodology for post-excavation analysis and reporting.	

4.7 NSW State Emergency Service

Item	Category	Issue	Response
4.7.1	Flood	Consideration of flooding issues should be in accordance with the requirements of NSW Government's Flood Prone Land Policy as set out in the Flood Risk Management Manual 2023 (the Manual) and supporting guidelines.	Noted. The assessment of flooding issues has been undertaken in accordance with the NSW Government's Flood Prone Land Policy and associated documents.
4.7.2	Flood	In summary, the roadways surrounding the site are inundated as frequently as the 20% Annual Exceedance Probability (AEP) event, with some roads reaching Hazard Level 5 (H5) flooding during the PMF. With little warning time available, this may pose a risk to site users attempting to travel to and from the buildings. Site design and stormwater management should aim to reduce the impact of flooding and minimise any risk to the community as far as practical. This should include reducing "the very minor increases to flood levels and flows in Parramatta Rd".	Noted. Site design and stormwater management has sought to reduce the impact of flooding and minimise any risk to the community as far as practical.
4.7.3	Flood	The emergency procedures contained in the Emergency Management Plan should be revised to reflect current NSW SES terminology and procedures.	The Flood Impact and Risk Assessment (FIRA) prepared by GRC Hydro has been updated (refer Appendix O). It includes an updated Emergency Management Plan (EMP).
Principles Outlined in the Support for Emergency Management Planning Guideline			

Item	Category	Issue	Response
4.7.4	Flood	Principle 1 Any proposed Emergency Management strategy should be compatible with any existing community Emergency Management strategy. Any proposed Emergency Management strategy for an area should be compatible with the evacuation strategies identified in the NSW State Flood Plan and the City of Sydney Council Flood Emergency Sub Plan, where evacuation is the preferred emergency management strategy for people impacted by flooding. Although we encourage homes and businesses to be prepared, we reinforce that a FERP is not a failsafe way of managing an underlying flood risk and that NSW SES cannot approve or endorse such plans. Instead, NSW SES supports the application of sound land use planning and flood risk management. Noting the above, in the interests of public safety we recommend that the Flood Emergency Response Plan is revised to reflect current NSW SES terminology and procedures, and recommend: 1. Implementing early triggers in the Flood Emergency Response Plan (FERP), such as monitoring Severe Weather Warnings and consider closing the site down ahead of the start of the university day, particularly considering the flash flooding risk in the area. 2. Ensuring the Emergency Management Plan contains clear actions to be undertaken and triggers which align with Australian Warning System warning levels, Bureau of Meteorology warnings or other specific flood information. 3. Ensuring any emergency management strategy considered for the site aligns with the Flood Risk Management Manual, including guideline EM01 Support for Emergency Management Planning, Ministerial Direction 4.1 and the Shelter-in-place Guideline for Flash Flooding, where applicable.	The EMP in Volume 3 has been updated to make it clear that evacuation from the site is the primary Emergency Management strategy, to maintain consistency with the NSW State Flood Plan and City of Sydney Council Flood Emergency Sub Plan. Monitoring Bureau of Meteorology Severe Weather Warnings and Severe Thunderstorm Warnings has been added to the emergency responses, with specific actions to undertake when receiving the warning. These include closing the site down ahead of the university day to minimise attendees to the site when risk of flash flooding is high. Actions have been aligned with Bureau of Meteorology warnings, as well as warnings issued by the NSW SES. Strategies have been aligned with the Flood Risk Management Manual, EM01, Ministerial Direction 4.1 and Shelter-in-place Guidelines for Flash flooding. The documents considered when developing the EMP have been included in Volume 3.

Item	Category	Issue	Response
4.7.5	Flood	Principle 2 Decisions should be informed by understanding the full range of risks to the community. Decisions relating to future development should be risk-based and ensure Emergency Management risks to the community of the full range of floods are effectively understood and managed. Climate change should also be considered. The site is affected by short duration flash flooding with flooding “contained to Parramatta Rd and Science Rd. University Oval 2 acts as a basin and is the closest source of rising floodwater to the Site”. These roadways surrounding the site are inundated as frequently as the 20% Annual Exceedance Probability (AEP) event, with some areas reaching Hazard Level 5 (H5) flooding during the PMF driven by high velocity. NSW SES has responded to flood related requests along Parramatta Road, including responding to cars in floodwater in the area identified as “H09 Parramatta Rd - Sag Point”. This location is identified as being impacted by “very minor increases flood levels and flows in Parramatta Rd”, while the Flood Impact and Risk Assessment (FIRA) suggests these increases are likely to be minor we recommend aiming to reduce any increases in either flood depth or velocity in this area.	Decisions have been based on the FIRA which considers floods from the 20% AEP to the PMF, covering the full range of floods. The FIRA provides a detailed assessment for use in the risk-based approach to the EMP. Climate Change is considered. Decisions are primarily based on the PMF. To clarify, the “H09 Parramatta Rd – Sag Point” is NOT impacted by minor increases in flood levels and flows in Parramatta Rd, but rather there are reductions in levels and flows at this location. Refer to Table 8, H09 and Table 9, Q06, Q07 and Q08 of the updated FIRA (Appendix O). Also refer Sections 4.1.1 and 4.1.2 in relation to the “very minor increases flood levels and flows in Parramatta Rd” where the increases are for single cells in the hydraulic model (a cell being a 2m square area). The area being discussed is circled in red in the 1% AEP impacts below: 
4.7.6	Flood	Principle 3 Development of the floodplain does not impact on the ability of the existing community to safely and effectively respond to a flood.	Agreed. The Project does not use mass rescue as a means for managing flood risk but rather prioritises strategies to minimise

Item	Category	Issue	Response
		Development strategies relying on an assumption that mass rescue may be possible where evacuation either fails or is not implemented are not acceptable to the NSW SES.	personnel onsite when flood risk is high and proposes a 'shelter-in-place' strategy as a tertiary means to manage flood risk for the site.
4.7.7	Flood	Principle 4 Decisions on development within the floodplain does not increase risk to life from flooding. Managing flood risks associated with High Flood Islands requires careful consideration of development type, likely users, and their ability respond to minimise their risks. This includes consideration of: 1. Isolation – There is no known safe period of isolation in a flood, the longer the period of isolation the greater the risk to occupants who are isolated. 2. Secondary risks – This includes fire and medical emergencies that can impact on the safety of people isolated by floodwater. The potential risk to occupants needs to be considered and managed in decision-making. 3. Consideration of human behaviour – The behaviour of individuals such as choosing not to remain isolated from their family or social network in a building on a floor above the PMF for an extended flood duration or attempting to return to a building during a flood, needs to be considered.	Whilst there is no known safe period of isolation in a flood, the site minimises risks associated with isolation given the use of shelter-in-place as a tertiary flood response. In addition, the site has a very small local catchment flooding and is therefore expected to subside quickly (2 hours or less) after the end of causative rainfall. Secondary risks have been considered and made clearer in the updated EMP. Evacuation to the FASS building, or any of the buildings to the east of the site is possible on foot from the site in the event of a fire risk. The priority has been to minimise personnel onsite when there is risk of flash flooding. This minimises the risks associated with human behaviour. The shelter-in-place is a final tertiary means to manage flood risk for the site and the EMP has made it clear to communicate to people sheltering that the sheltering period will be short and to not leave the site due to the potential hazardous flooding surrounding the site.
4.7.8	Flood	Principle 5 Risks faced by the itinerant population need to be managed. Any Emergency Management strategy needs to consider people visiting the area or using a development.	The updated EMP has clarified that visitors to the site have been considered in the development of the strategy.
4.7.9	Flood	Principle 6 Recognise the need for effective flood warning and associated limitations. An effective flood warning strategy with clear and concise messaging understood by the community is key to providing the community an opportunity to respond to a flood threat in an appropriate and timely manner. As the site is affected by flash flooding little to no warning time is likely to be	Actions have been linked to the regional weather warnings issued by the BoM and actions prioritised to minimise people on the site well before flash flooding is expected to occur. Tertiary strategies have been developed to manage situations where personnel are still present on the site during a flood.

Item	Category	Issue	Response
		available with Severe Weather Warnings and Severe Thunderstorm Warnings from the BOM the only warnings currently available.	
4.7.10	Flood	Principle 7 Ongoing community awareness of flooding is critical to assist effective emergency response. The flood risk at the site and actions taken to reduce risk to life should be communicated to all site users (includes increasing risk awareness, community connections, preparedness actions, appropriate signage and emergency drills) during and after the construction phase.	The EMP has included recommendations for the communication of flood risk for the site considering the users of the site. Emergency drills are recommended every teaching semester to align with the use of the site.

4.8 Sydney Water

Item	Category	Issue	Response
4.8.1	Water and Wastewater Servicing	Our preliminary assessment indicates that water and wastewater servicing should be available for the proposed development. - Amplifications, adjustments, deviations and/or minor extensions may be required. - The proponent should provide an up to date demand projections for water usage and wastewater discharge at the Section 73 application stage.	Noted.
4.8.2	Water and Wastewater Servicing	Should the Department decide to progress with the subject development application, Sydney Water would require the following conditions be included in the development consent. - Section 73 Compliance Certificate - Building Plan Approval Development Application Info Sheet provided	Noted.

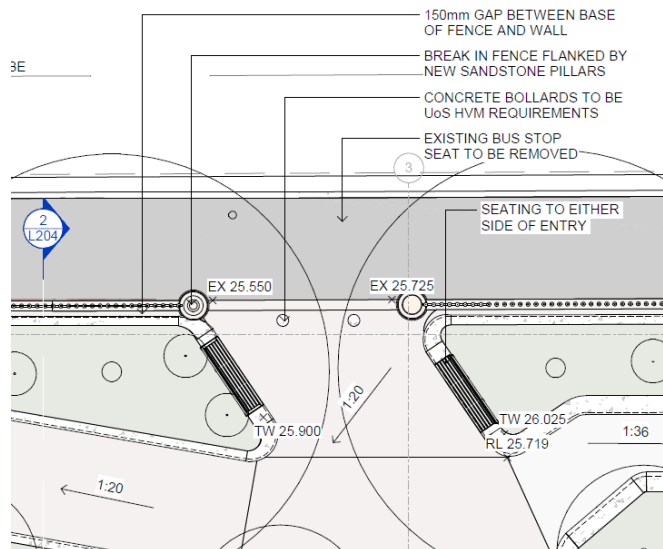
4.9 Transport for NSW (TfNSW)

Item	Category	Issue	Response
4.9.1	Bike Box	The proposed bike box is not supported by TfNSW as previously advised in the advice provided on 25 October 2024.	The University has undertaken consultation with TfNSW regarding the proposed bike box and provided further evidence in support of its

Item	Category	Issue	Response
		The proposed bike box results in the stop line being relocated further away from the intersection, which could lead to safety issues with sight lines to pedestrians crossing and a reduction in efficiency of the signals. It also increases the intersection footprint by locating the stop line on Western Avenue further south, which is highly likely to have a negative impact on the safe operation of the pedestrian crossing facility (P4, across the western approach of Parramatta Road) due to creating poorer driver visibility on the south approach to the signalised intersection to pedestrians and cyclists.	installation, as detailed in Appendix B. Having regard to the additional information provided by the University, TfNSW advised (email dated 31 July 2025, Appendix B) as follows: ▪ <i>Subject to compliance with the minimum driver sight line distances outlined in Austroads guidelines—specifically from the Western Avenue southbound approach to pedestrians on the southern footway of Parramatta Road, TfNSW is amenable to the inclusion of the proposed bike box. A condition to this effect will be sought and may necessitate the removal of vegetation within the University grounds to ensure adequate visibility.</i> ▪ <i>The implementation of the bike box will require the Applicant to enter into a Works Authorisation Deed with TfNSW. As part of this process, a detailed design review will be undertaken, which may result in amendments to the current preliminary concept design.</i> ▪ <i>TfNSW does not support the introduction of a dedicated bicycle signal phase at this location in the absence of a continuous shared path along Parramatta Road. Such infrastructure is essential to justify and support the operational effectiveness of a separate bicycle phase.</i> The first two items above are accepted by the University and can be dealt with via conditions of consent. The University also acknowledges that a dedicated bicycle signal phase cannot be introduced at this time.
4.9.2	Proposed Zebra Pedestrian Crossing	TfNSW does not support the proposed zebra pedestrian crossing. The zebra crossing proposed approx. 40m south of the signals raises efficiency concerns as it is likely to adversely impact traffic on Parramatta Road due to increased pedestrian activity in this area leading to drivers finding it difficult to find safe gaps to pass the zebra crossing and continue south on Western Avenue, which could result in queues extending into the Parramatta Road/Ross Street/Western Avenue intersection. Additionally, visibility to pedestrians for northbound drivers on	SCT Consulting has prepared a technical memo exploring whether the zebra crossing proposed could cause queue spillback onto Parramatta Road (refer Appendix Q). It finds that the critical threshold at which queue spillback is expected is much higher than the anticipated uplift in pedestrian activity in the area and recommends proceeding with the zebra crossing. In its email of 31 July 2025 (Appendix B), TfNSW advised as follows with respect to the zebra crossing:

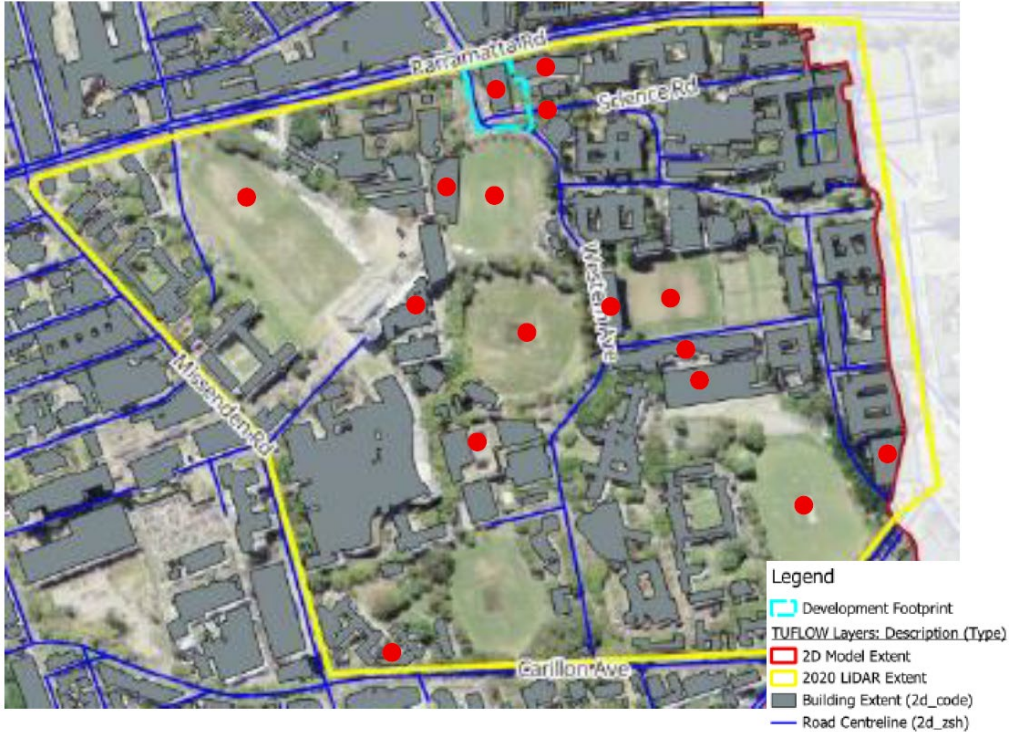
Item	Category	Issue	Response
		Western Avenue will be obscured by the queued vehicles, raising further safety concerns. As such, should there be a need for pedestrian connectivity, consider alternative options that would not take away priority to entering vehicles, such as a pedestrian refuge.	▪ TfNSW is amenable to the marked pedestrian crossing in Western Avenue as depicted on Drawing Number AR-02A-XX-04 Issue 07 [refer Architectural Drawings at Appendix D of the EIS]. ▪ Appropriate measures should put in place to ensure that pedestrians cross Western Avenue via the marked pedestrian crossing. ▪ There is a typo error on Technical Note dated 26/06/25 summarised in the Recommendations on Page 3 (screenshot below) that the 95th percentile queues of 2.9m and 2.7m in AM and PM peak. Please check if these numbers are correct. Having regard to TfNSW's advice, no changes to the zebra crossing are required. With respect to the Technical Note error, SCT Consulting has advised as follows: <i>... confirming that the 2.9m and 2.7m queues reported are not a typo and extracted directly from our SIDRA model. The queue is short due to the relatively low volume of vehicle movements (and pedestrians) and SIDRA is not expecting the interaction between this volume of vehicles and the estimated number of pedestrians crossing to cause any significant queues build up.</i> In light of SCT Consulting's advice and the outcome of the SIDRA model, it is considered that the identified queues are satisfactory given the volume of vehicles and pedestrian numbers.
4.9.3	Medium Rigid Vehicle (MRV)	The traffic impact assessment prepared by SCT Consulting (dated 13 February 2025) states that an MRV will service the proposed loading dock within the site. Swept paths (with required clearances) are to be provided, demonstrating that an MRV can safely turn in and out of the site. The swept paths should also demonstrate that an MRV can turn left into the site using only the kerb side lane on Parramatta Road.	Further investigations were undertaken by the University to determine whether MRVs can turn left into the site from Parramatta Road using only the kerb side lane. These investigations found that MRV's do in fact turn left into the university but only from the second lane. This leads to mounting/clipping of the median by the front wheel but MRVs can still physically make it into the site.

Item	Category	Issue	Response
			The current situation with respect to MRVs exists irrespective of the proposed development, and the Project does not worsen it in any way. The removal of the existing median at the centre of the crossing offers an improvement to the MRVs turning in. However, the University is receptive to introducing a ban to MRV's turning left into the university from Parramatta Road (only from the east), to be implemented with a sign stating "no left turn, vehicles under 6.4m excepted". Note that MRVs can still enter the university at this gate from the north and from the west. TfNSW has agreed that a restriction on MRVs turning left into the site from Parramatta Road should be introduced, although noting that the sign should read "no left turn, vehicles under 6m excepted" (refer email dated 31 July 2025 Appendix B). TfNSW also noted that the existing No Right Turn restriction from Parramatta Road into Western Avenue (Sydney University access) is to be maintained i.e. MRVs are not able to turn into the University from the west. Having regard to the above, the University agrees to the placement of a sign on Parramatta Road restricting vehicle entry from the east to vehicles under 6m only.
4.9.4	Driver visibility	Any vegetation/street furniture proposed within Western Avenue should not obstruct driver visibility to traffic lanterns and pedestrians. Particularly, the vegetation proposed within the concrete median in Western Avenue may limit driver visibility to oncoming pedestrians, which is a major safety concern given the future high pedestrian activity in this area	The planting has been reviewed and smaller trees/plants have been proposed in the concrete median in Western Ave. This is shown on the Architectural Drawings submitted with the EIS (Appendix D).
Advisory comments			
4.9.5	Parramatta Road Vision Project	The property is located within an area under investigation for potential long-term upgrade of Parramatta Road. TfNSW is currently considering all options as work towards revitalising Parramatta Road as a multimodal transport corridor	Noted.
4.9.6	Walkability	It is suggested that the landscaping design provides consideration in supporting a wider footpath along the Parramatta Road corridor to support better accessibility to the	A revised approach to the Parramatta Road frontage is proposed to address concerns expressed by both Heritage NSW and Council regarding the heritage impact of removing part of the palisade fencing.

Item	Category	Issue	Response
		bus stop and the walkability of the area. The current design provides for planted areas close to the boundaries, using these spaces to widen the pavement at the roadside will improve areas that may be experiencing pedestrian congestion as the development encourages more pedestrian movement.	The proposed solution which involves retaining the fence but with three discrete openings has still sought to improve the area around the bus stop. As shown below, a wider opening is proposed adjacent to the bus stop to allow for additional pedestrians to congregate during peak periods and seating is to be provided at either side of the entrance. It is considered that the revised solution provides an appropriate balance between protecting heritage values whilst addressing pedestrian safety and amenity concerns. 

4.10 Conservation Programs, Heritage and Regulation Group

Item	Category	Issue	Response
4.10.1	Flooding	1. Provide a map showing all the changes made to the flood model since the Johnstons Creek Flood Study. 2. Include the latest works at University Oval 2 in the flood model. 3. Provide flood risk impact mapping for the change in risk from the development, using the Science Road works and all other prior developments as the base case. This should be in addition to the mapping that considers both the proposed development and Science Road works. 4. Remove the blocked footprint of the demountable buildings from the base case flood data model to accurately represent flow paths and impacts. 5. Compare the cumulative impacts of development to the base case Johnstons Creek Flood Study data model including the demountable buildings correction.	A detailed response to the flooding issues raised in the CPHR submission have been addressed in the Flood Response Statement at Appendix P and updated Flood Impact and Risk Assessment (FIRA) prepared by GRC Hydro (refer Appendix O). The key points in the response are provided below. As discussed in the Flood Response Statement and updated FIRA, flood risk to the site is minimal. Based on the Johnson Creek Flood Study, the subsequent Floodplain Risk Management Plan and the updated FIRA, it is clear that: - no floodwater is flowing through the site from Parramatta Rd in all events - only very shallow floodwater (<0.035m) at the southern end of the building is evident in the PMF. Neither of these indicate flood risk to the site. It should be noted that the proposed building does not change the risk of inundation from Parramatta Rd and is located outside of the PMF extent as shown in Image 6 in the Flood Response Statement (refer Appendix P). <i>1. Provide a map showing all the changes made to the flood model since the Johnstons Creek Flood Study.</i> From the FIRA (Section 2, Page 5) the list of updates to create 'Existing Conditions', or the baseline conditions for the FIRA, includes the following items, several which were completed post 2016. - The Charles Perkins Building (development finished 2013) - The Nanoscience Building (development finished 2014/2015) - The Susan Wakil Health Building (development finished 2022) - The Michael Spence Building, - The Physics Road Learning Hub, - Updates to St Pauls Oval, - Updates to St John's Oval, - Additions to St John's College and nearby carpark, - The Demountable Village, - The new Social Sciences Building,

Item	Category	Issue	Response
			▪ The grandstand in University Oval 2 and associated upgrades, and, ▪ Various updates to Hockey Square and University Oval 1. Section 2.1 provides several notes regarding how these updates were included, including using the most recent LiDAR which is from 2020 (Page 7), including survey (Page 7), updating building polygons based on aerial imagery (Page 7), the stormwater upgrade in Science Rd which was completed 2016 (Pages 7 and 8). A markup on Image 3 from the FIRA is provided below which notes the locations with changes since the Johnstons Creek Flood Study as red dots and the yellow border is the extent of the LiDAR used. 

Item	Category	Issue	Response
			<i>2. Include the latest works at University Oval 2 in the flood model.</i> There are no works at University Oval 2 to include beyond those already included in the flood model which includes the grandstand upgrade and formalisation of University Oval 2 as a floodwater basin which were completed between 2016 and 2023. During 2025 maintenance is being undertaken to University Oval 2 in 2025 however this does not involve any works that should be included in the flood model. Given the lack of works at University Oval 2 and the insignificant impact of these on the FIRA, there is no need to further update the flood model with the maintenance works in University Oval 2. It is GRC Hydro's view that the flood model has been updated sufficiently to give baseline conditions representative of 2023/2024 for the FIRA. <i>3. Provide flood risk impact mapping for the change in risk from the development, using the Science Road works and all other prior developments as the base case.</i> <i>This should be in addition to the mapping that considers both the proposed development and Science Road works.</i> For context the University Campus upgrade work in Science Rd was originally within the scope of the FIRA but was taken out mid-2024 for reasons unrelated to flooding. GRC Hydro advised that it was unnecessary to repeat the flood modelling given the low flood liability of the site and the minor impact that the road realignment has on flood behaviour. This impact of the University Campus upgrade work in Science Rd was considered minor given: ▪ Floodwater will still be conveyed to Western Ave, which will then flow into the University Oval 2 detention basin or continue west to the ponding area in the JD Stewart Building carpark as per existing flood behaviour. ▪ The works do not change the existing flood mitigation measures in the area which are (1) the flood stormwater system located east of the site in Science Rd, (2) the footpath surrounding University Oval 2 in Western Ave which controls how much floodwater overtops and (3) the University Oval 2 detention basin ▪ The road realignment proposed does not involve any changes that would increase the amount of rainfall runoff in the area. ▪ The proposed works do not add or remove any flood storage.

Item	Category	Issue	Response
			Given the above, repeating the flood modelling with the University Campus upgrade work in Science Rd in the Existing Conditions, rather than Proposed Conditions, would not make any difference to the flood risk assessment in the FIRA. <i>4. Remove the blocked footprint of the demountable buildings from the base case flood data model to accurately represent flow paths and impacts.</i> GRC Hydro confirmed the building has been represented as a blocked footprint. However, as noted in Section 1 of the Flood Response Statement, there are no flow paths through the site from Parramatta Rd. The only flow path that maybe blocked by the building footprint is shallow flow overtopping the kerb in Science Rd. The only instance of this potentially occurring is in the PMF with depths < 0.035m inundating the south-eastern corner of the building before returning to Science Rd. If this shallow floodwater is creating a flow path through the southern portion of the building it will be shallower than this and as the site slopes in a south-west direction it would also flow in a similar direction. Some images from street view and the site visit are provided in the Flood Response Statement (Appendix P) which show: ▪ The USYD fenceline has a solid base at 0.15m above the footpath which removes any risk of floodwater from Parramatta Rd creating a flow path through the site given the floodwater depths on the footpath are less than 0.05m. ▪ The base of the demountable village is surrounded by wooden paling set quite close together. Any change to the building representation is going to make very little difference as the blockage factor would be very high (in the order of 90% or more). As there is no flow path to change the representation for, the only other reason to change would be to account for flood storage. However, the only rising floodwater that reaches the site is in the PMF which only inundates the south-west corner of the site. The building representation would not be impacting the flood storage sufficiently to warrant a change. Given the above, along with the low flood liability of the site, there is no reason to repeat the flood modelling with a changed building footprint.

Item	Category	Issue	Response
			<i>5. Compare the cumulative impacts of development to the base case Johnstons Creek Flood Study data model including the demountable buildings correction.</i> The purpose of the FIRA is to assess the impact of the development against existing conditions in order to assess the potential risk the site's proposed development poses on flooding for the site and the surrounding community. A comparison between Proposed Conditions with the development to the Johnstons Creek Flood Study does not achieve this as the flood study is from 2015. To properly understand existing flood behaviour the updates noted in the FIRA were made to represent 2023/2024 site conditions to use as the base case. The cumulative assessment of development within the university campus to the Johnstons Creek Flood Study was completed in the University of Sydney Camperdown Campus – Stormwater Concept Design Report (Warren Smith & Partners, Dec 2015) and the “University of Sydney Camperdown Campus Flood Mitigation Master Plan – Final Report” (WMA Water, October 2015) as part of the USYD Campus Improvement Program which was approved in SSD-6123. As noted in the response to Recommendation 4, there is no benefit to repeating the flood modelling for the ‘demountable buildings correction’.
4.10.2	Velocity increase	CPHR identified that Figures C05, C06 and C07 show increases in velocity greater than 0.4 m/s for each flood event modelled. In comparison this is different to Table 12 where it suggests that flood velocities decrease on Science Road. Recommended action: 6. Review and correct any inconsistencies in the reported velocity values.	Table 12 and the velocities have been reviewed. Table 12 is reporting the maximum velocities over all of Science Rd. However, the C05, C06 and C07 figures are mapping the difference in velocities at the peak of the flood. So C05, C06 and C07 can show velocities increasing >0.4m/s for a particular location along Science Rd, however the maximum velocity when considering the whole road is decreasing in the proposed case in the FIRA. The maximum of ALL values in Science Rd drops from 3.0m/s to 2.3m/s as shown in Table 12.
4.10.3	Hazard categorisation	CPHR observed that under existing conditions, Science Road is categorised as H5 and H6. A comparison of the FIRA's hazard figures pre- to post-development indicates that previously spread-out high hazard areas on Science Road	<i>Recommendation 7: Discuss the concentration of high hazard flows on Science Road and evaluate additional impacts of the development on this change.</i> CPHR is correct in its observation that the hazards are being concentrated at the end of the realignment of Science Rd and that along Science Rd hazards have shifted from the northern

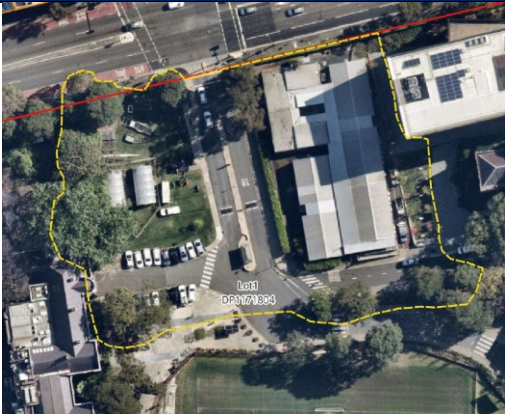
Item	Category	Issue	Response
		have become more concentrated and potentially increase overall across all flood events. Although the maximum hazard category remains unchanged, any increase in depth or velocity is not desirable and efforts have not been made to mitigate these impacts. H5 and H6 hazard categorisations are dangerous for people, vehicles and buildings. While these impacts are confined within the subject site, they would impact existing facilities and roads within the University Campus. The full extent of increase in depth and velocity should be provided, along with modelling of a more frequent flood event to determine if more frequent events result in a change in hazard category. Recommended actions: 7. Discuss the concentration of high hazard flows on Science Road and evaluate additional impacts of the development on this change. 8. Include the full extent of increase in depth and velocity within the subject site. 9. Model more frequent flood events in accordance with the requirements of the LU01 Guideline. 10. Include proposed stormwater drainage in the flood model. 11. Provide mitigation measures to demonstrate that changes in flood behaviour are addressed.	gutter of the road towards the southern gutter. As a result floodwater is concentrating on the western gutter of this realignment rather than being spread between two gutters. While there are no additional impacts on the development due to this change, it is a local change and may influence the road design during the University Campus upgrade work in Science Rd. However, this is not part of the subject development and is therefore outside the scope of the FIRA. <i>8. Include the full extent of increase in depth and velocity within the subject site.</i> Velocity and level impact maps have been provided in excess of the LU01 recommendations with maps for the 20% AEP, 1% AEP, 0.2% AEP and PMF. The impacts do not extend beyond the mapped areas and as reported are all local impacts around Science Rd and University Oval 2, except for some minor benefits for offsite flows at the USYD campus outlet at Parramatta Rd near Larkin St. <i>9. Model more frequent flood events in accordance with the requirements of the LU01 Guideline.</i> The FIRA already provides a more frequent flood event than recommended in the LU01 Guidelines. The LU01 Guidelines recommend the 10% AEP to the PMF as the full range of events (Section 2.3 and Appendix A Table 6). The FIRA provides the 20% AEP to the PMF. In excess of the LU01 Guidelines GRC Hydro has provided impact mapping for the 20% AEP as well as the mapping extends to include all the areas impacted. <i>10. Include proposed stormwater drainage in the flood model.</i> The proposed stormwater site drainage is not included by design. As noted above there are no flowpaths through the site in the flood model. The assumption is that ALL rainfall in excess of the site's infiltration capacity is conveyed as overland flow to Science Rd. This is a very conservative assumption that there will be overland flow in excess of what might be managed by the site's stormwater drainage in flood events. Changes to the infiltration capacity are noted in Table 5, Page 10 of the FIRA with the changes to impervious and pervious percentages which note an increase in Impervious surfaces of 6%

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			to 7%. In essence, detailed pipes for proposed conditions are not going to change the outcomes of the FIRA showing low flood risk due to the proposed development. <i>11. Provide mitigation measures to demonstrate that changes in flood behaviour are addressed.</i> As noted in the FIRA, there are no changes in flood behaviour to mitigate. Any impacts are local and concentrated on the site, Science Rd, or University Oval 2 which are all within the USYD Campus which is considered as a single entity when assessing the need to mitigate impacts within the scope of the Campus Improvement Program. No comments from City of Sydney Council were received indicating any issues with the flooding impacts reported within the FIRA. The only change in flood behaviour is that more floodwater from Science Rd is being directed towards the detention basin at University Oval 2. This change is within the road corridor and causes very shallow, but high velocity, floodwater to cross the road at the Science Rd realignment with no impacts beyond this. As noted earlier the road realignment is part of the University Campus upgrade work in Science Rd and not within the scope of the FIRA
4.10.4	Flood risk to pedestrians	The proposed development includes increased pedestrian access along Science Road, where new areas of high hazard flooding are observed. CPHR requests further detailed consideration to address flood risk to pedestrians along Science Road. Recommended action: 12. Address flood risk to pedestrians on Science Road.	As noted above, the high hazard flooding is high velocity floodwater within the gutter of Science Rd. This is no flood risk of any magnitude given: a) Pedestrians typically use the footpaths and avoid walking in the gutters. b) There are pedestrian crossings located in Science Rd and Western Ave which do not have high hazard floodwater crossing them except within the gutters (the PMF being an exception). c) Pedestrians typically shelter during a flood event. The results presented in the FIRA are during the peak of the storm. d) As per (a) pedestrians are very unlikely to use the steep part of the road where Science Rd has been realigned to cross Science Rd or Western Ave. Given the above there is not an increase of flood risk to pedestrians on Science Rd. The existing risk of injury should a pedestrian step into the high velocity floodwater in the gutter, in the middle of a flood event in excess of the 20% AEP remains, however the shallow floodwater in the gutter is unlikely to create a situation where a pedestrian is swept away to endanger their

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			life and this very specific situation does not warrant a specialised flood mitigation measure to be designed and implemented as part of the proposed works. As noted earlier the road realignment is part of the University Campus upgrade work in Science Rd and not within the scope of the FIRA.
4.10.5	Potential flood impacts to the basement	The Architectural Drawings in Section 01 show a basement level of 21.0 m Australian Height Datum (AHD), which is significantly below the design flood planning level of 25.5 m AHD as indicated in the FIRA for this subject site. Although this level is accessed via internal stairs from an upper level, the basement has a larger footprint than the upper levels. It is not clear if all possible entry points, including ventilation for the basement have adequate flood protection. The basement contains critical plant and other infrastructure, and should be designed to exclude water, particularly if the emergency management strategy requires shelter in place. Recommended action: 13. Demonstrate how floodwater is prevented from entering the basement in all events up to and including the Probable Maximum Flood (PMF) event.	Whilst Level 01 of the proposed building is at 21.0 mAHD and has a larger footprint than the Level 02 footprint shown in the FIRA: (1) almost all of it is underground, (2) as noted in the FIRA the only access is internal stairs from Level 02, and (3) Level 01 lies under the 25.5 mAHD high, flood free, footprint of the site. The ventilation is located on or above 25.5 mAHD and is flood free. Section 3.4 has been updated to make this clearer. The only component of Level 01 that interacts with an area below 25.5 mAHD is a window located on the path near the south-western stairs towards Ross St/Western Ave. As this lies within the 1% AEP + 500mm area it will have to be made of flood compatible materials and has been designed to be flood proof. The PMF has a 24.04 mAHD level which is well below the 25.5 mAHD entrances to the site as discussed in Section 3.4. As such the proposed building is designed to prevent inundation of the basement, for all events up to and including the PMF.
4.10.6	Emergency Management	CPHR requests the Flood Risk Management Guideline EM01 Support for Emergency Management Planning (EM01) be addressed. The EM01 Guideline recommends that any emergency response strategy be consistent with NSW State Emergency Service (SES) local flood plans. Flood emergency management issues should be co-ordinated with the SES and be	NSW SES was consulted on the emergency management during the SSDA submission and its recommendations have been incorporated into the Emergency Management Plan in Volume 3 of the updated FIRA (refer Appendix O).

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		adequately resolved prior to determination to ensure that the development would be compatible with the flood function and behaviour of the land. CPHR considers private flood emergency response plans are not a substitute for land use planning. Section A2.4.2 of the EM01 Guideline states that 'requiring a site-specific flood response plan as a condition of consent for development is not considered a genuine attempt to manage flood risk to future occupants' and provides further guidance on issues with such plans. Section 1.2 (Regional weather warnings and preliminary evacuation) of the flood emergency management plan includes unfeasible requirements. CPHR requests the proponent review the requirements in consultation with the University's facility manager to discuss the approach of early evacuation for each severe weather or thunderstorm warning. The review should refer to an estimate of the number of such warnings in the Sydney area over the past 12 months. Recommended actions: 14. Coordinate flood emergency management issues with the SES. 15. Update the preliminary management plan in collaboration with the University's facility manager, ensuring it includes only practical and implementable solutions. 16. The flood emergency plan should address the established planning principle on the plans of	

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		management in accordance with Renaldo Plus 3 Pty Limited v Hurstville City Council [2005] NSWLEC 315.	
4.10.7	Water Sensitive Urban Design (WSUD)	'Ocean protect' treatment cartridges are proposed for this development to achieve water quality outcomes. CPHR advises the proposed development should be reviewed to ensure these cartridges are an acceptable alternative to soft landscaping treatments typically recommended by WSUD policies. Recommended action: 17. Review the proposed stormwater treatment against Council's requirements.	The proposed 'Ocean Protect' treatment cartridges are designed to complement the soft landscaping measures included in the landscape consultant's design. The overall stormwater treatment train has been reviewed and is compliant with Council's specific WSUD requirements.
4.10.8	Biodiversity Development Assessment Report (BDAR) waiver	The project description in the EIS states a gross floor area (GFA) of 6,913 m², while the BDAR waiver request report stated a GFA of 6,200 m². CPHR seeks clarification on the additional GFA 713 m² for the proposed development. CPHR understands the number of storeys and Figure 30 of the EIS appear to be consistent with the BDAR waiver granted for this SSD on 31 May 2024. If the development footprint has changed, the proponent will need to lodge a new BDAR waiver request or prepare a BDAR. Recommended actions: 18. Provide a description of the additional 713 m² GFA difference between the BDAR waiver report and EIS. 19. Lodge a new BDAR waiver request or prepare a BDAR if the development footprint has changed.	The BDAR waiver request states a GFA of approximately 6,200m² for the proposed building. The EIS GFA of 6,913m² considers the GFA to be both the fully enclosed covered areas and unenclosed covered areas (for the purposes of calculating the usable spaces). This information in the BDAR waiver is for the proposed building and has been provided for background information – for reference. The development footprint has not changed. The BDAR assessment done on the existing site is shown below in yellow and extends beyond the Project. As such, there is no need for a new BDAR waiver request.

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4.11 Public submissions

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4.11.1	Benjamin Phillips	This application for the addition of new high quality learning spaces should be allowed to progress. The provision of extra high quality learning spaces is necessary to accommodate existing and future student numbers. As a current student, I have exams scheduled on weekends, which is unsatisfactory, due to a lack of available learning and teaching spaces. This project will help alleviate those concerns, and also provide a new, architecturally stunning building which will complement the existing heritage of the R.D. Watt building. If anything, the existing de-mountable complex detracts from the significance and heritage of the area.	Noted. No response required.
4.11.2	Name withheld	The area adjacent the Parramatta Rd bus stop needs to be opened up further by relocating the planter beds further from the road/property boundary. This is a very busy stop that is very constrained and has been in the Sydney Morning Herald as one of the worst bus stops in Sydney. It is wedged	The University acknowledges that the bus stop currently is unsafe and offers poor amenity for pedestrians, and is committed to improving the area around the bus stop. While the University is no longer proposing to remove the palisade fence in response to concerns raised by Heritage NSW and Council regarding the

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		between a fence and a 6 lane main road. This proposal is an opportunity to contribute to the local community (Sydney University and the adjacent area) through improved infrastructure. Additionally it shows a greater commitment to sustainability and the use of public transport.	heritage impact, it is proposing an opening in the fence adjacent to the bus stop which will help improve pedestrian safety and amenity in this area. Seating is proposed on either side of the entrance to further improve the pedestrian experience adjacent to the bus stop. Refer Sections 4.3 and 4.6 for further discussion.

5 UPDATED PROJECT JUSTIFICATION

This Submissions Report has satisfactorily responded to each of the issues raised by the referral authorities regarding the proposed Ross Street Teaching and Learning Hub at the corner of Ross Street and Parramatta Road in Camperdown.

The report is accompanied by:

- Updated Architectural and Landscape Plans.
- Supplementary reports which provide additional clarification and information regarding technical issues.

This section provides an updated justification and evaluation of the project as a whole. Overall, it is considered the updated proposal responds satisfactorily to all the issues arising from public exhibition process and therefore is acceptable having regard to the relevant biophysical, economic and social considerations.

Strategic context

The proposed development contributes to the State Government's vision for the Camperdown- Ultimo Health and Education Precinct. The proposed development provides a state-of-the-art teaching and learning hub that achieves design excellence and is strategically located along Parramatta Road at one of the key gateway sites to the University.

Statutory context

The proposed development is classified as State Significant Development (SSD) and has followed the SSDA pathway in accordance with the *State Environmental Planning Policy (Planning Systems) 2021*. The proposed development complies with all relevant provisions under the Sydney LEP 2012 and generally complies with the relevant provisions in the Sydney DCP 2012. The proposed development is consistent with the objectives of the SP2 zones that apply to the Project.

Likely impacts of the Project

The proposed development has been assessed considering the potential environmental, economic and social impacts as outlined below:

Natural Environment: The Project addresses the principles of ecologically sustainable development in accordance with the requirements of the *Environmental Planning and Assessment Regulation 2021*. Further, a BDAR waiver has been granted by DPHI, as it was found no biodiversity occurs on the site. As detailed in the updated FIRA (**Appendix O**), the Project will not create any significant flood impacts to surrounding buildings places.

Built Environment: The proposed building is of an appropriate scale and bulk, sitting within the building envelope established by the approved Campus Improvement Program (CIP) SSD-6123. The high quality, contemporary design of the building will contribute to the emerging character of the Life Sciences precinct. It has been designed with careful consideration of the adjacent R D Watt Building, while also being cognisant of the significant thoroughfare and vista of Science Road.

Social: The Project will significantly improve teaching, learning and informal education facilities, addressing the current shortfall of quality teaching and learning spaces on campus. It will also improve pedestrian safety and amenity.

Economic: The proposed development represents a significant investment in a knowledge-intensive institution. It will strengthen the economic and productive role of the Innovation Corridor by providing quality education space in a gateway building along Parramatta Road. The Project will provide 93 jobs (direct and indirect) full-time equivalent jobs in the short-term through construction and approximately 8-10 full-time equivalent jobs in the long-term.

Suitability of the site

The site is considered highly suitable for the proposed development, as the Project is consistent with relevant State and local strategic plans and substantially complies with the relevant State and local planning controls. The Project responds to the site context and the scale and form of the proposed design as set out in the CIP and is consistent and integrated with the surrounding built character including the nearby R.D. Watt and J.D. Stewart buildings.

Public interest

The Project is dedicated to the advancement of excellence in teaching and learning and as such is in the public interest. The Project will also facilitate the revitalisation of the site and deliver a high quality design and public domain outcome, notably improving pedestrian safety, amenity and legibility.

Summary

Having considered all relevant matters, the proposed development is appropriate for the site and approval is recommended, subject to appropriate conditions of consent.