

Submissions and Amendment Report

Western Sydney University Indigenous Centre of Excellence

Western Sydney University
Parramatta South Campus
171 Victoria Road, Parramatta

Submitted to the
Department of Planning,
Housing and
Infrastructure

On behalf of
Western Sydney University

SSD-64916225





'Gura Bulga'

Liz Belanjee Cameron

'Gura Bulga' – translates to Warm Green Country. Representing New South Wales.



'Dagura Buumarri'

Liz Belanjee Cameron

'Dagura Buumarri' – translates to Cold Brown Country. Representing Victoria.



'Gadalung Djarri'

Liz Belanjee Cameron

'Gadalung Djarri' – translates to Hot Red Country. Representing Queensland.

Ethos Urban acknowledges the Traditional Custodians of Country throughout Australia and recognises their continuing connection to land, waters and culture.

We pay our respects to their Elders past, present and emerging.

In supporting the Uluru Statement from the Heart, we walk with Aboriginal and Torres Strait Islander people in a movement of the Australian people for a better future.

Contact:

Daniel Howard

Director

dhoward@ethosurban.com

This document has been prepared by:

Jordan Balazs
Julia Moiso

19 August 2025

This document has been reviewed by:

Daniel Howard

19 August 2025

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19/08/2025

Prepared by

JM

Approved by

DH

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Attachments

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A. Submissions Register	<i>Ethos Urban</i>
B. Updated Mitigation Measures	<i>Ethos Urban</i>
C. Architectural Drawings (Clean)	<i>JCBA</i>
D. Architectural Drawings (Clouded)	<i>JCBA</i>
E. Architectural Response to Submissions Letter	<i>JCBA</i>
F. Site Plan with Riparian Zone	<i>JCBA</i>
G. Design Report	<i>JCBA</i>
H. Landscaping Drawings (Clean)	<i>Jane Irwin Landscape Architecture</i>
I. Landscaping Drawings (Clouded)	<i>Jane Irwin Landscape Architecture</i>
J. Design Integrity Panel Report	<i>City Lab</i>
K. Civil Drawings & Specification Report	<i>TTW</i>
L. Stormwater SSD Report	<i>TTW</i>
M. Civil Response to Submissions Letter	<i>TTW</i>
N. Flood Impact Risk Assessment	<i>GRC Hydro</i>
O. Utility RTS Letter	<i>Steensen Varming</i>
P. Transport and Accessibility Impact Assessment	<i>TTW</i>
Q. Green Travel Plan	<i>TTW</i>
R. Construction Traffic Management Plan	<i>TTW</i>
S. RTS Structural Integrity Letter	<i>TTW</i>
T. Temporary Car Park Strategy	<i>Western Sydney University</i>
U. WSUD Strategy	<i>E2 Design Lab</i>
V. Aboriginal Cultural Heritage Response to Submissions	<i>Curio</i>
W. ACHAR	<i>Curio</i>
X. Archaeological Research Design	<i>Curio</i>
Y. Response to Excavation Director Criteria	<i>Curio</i>
Z. Heritage Impact Statement	<i>Curio</i>
AA. Historical Archaeological Assessment	<i>Curio</i>
BB. BCA Report	<i>BM+G</i>
CC. Arboricultural Impact Assessment & Tree Protection Plan	<i>Tree Survey</i>
DD. Noise and Vibration Impact Assessment	<i>PWNA</i>

EE.	Accessibility Statement	MGAC
FF.	RTS Updated Detailed Site Investigation	Douglas Partners
GG.	Car Park Geotechnical Investigation	Douglas Partners
HH.	Car Park Remediation Action Plan	Douglas Partners
II.	Façade Projection	Steensen Varming
JJ.	Performance Based Design Brief	Scientific Fire Services
KK.	Fire Safety Engineering Design Letter	Scientific Fire Services
LL.	Industry and Employment SEPP Schedule 5 Assessment	Ethos Urban
MM.	Visual Impact Assessment RTS Letter	Ethos Urban
NN.	Visual Impact Assessment	Ethos Urban
OO.	Visual Impact Photomontage and Methodology Report	Virtual Ideas
PP.	Crime Prevention Through Environmental Design Assessment	Ethos Urban
QQ.	Consultations Outcomes Report	Ethos Urban
RR.	Pedestrian Wind Assessment	CPP Wind Engineering
SS.	Car Park Biodiversity Development Assessment Report	Land Eco Consulting
TT.	ESD Report	Flux Consultants
UU.	NABERS - Embodied Emissions Materials Form	Slattery Australia
VV.	Email from Crown Lands	Crown Lands
WW.	Estimated Development Cost	Slattery Australia
XX.	Social Impact Assessment	GYDE
YY.	Construction & Demolition Waste Management Plan	Elephants Foot Consulting
ZZ.	Operational Waste Management Plan	Elephants Foot Consulting
AAA.	Turf Cell Maintenance Strategy	TTW
BBB.	Lighting and Electrical Drawings & Specifications	Steensen Varming
CCC.	Car Park Subsurface Utility Report	Qasar Subsurface Utility Consultants

Executive Summary

This Submissions and Amendment Report has been prepared by Ethos Urban on behalf of Western Sydney University (WSU) (the Applicant) for the Indigenous Centre of Excellence State Significant Development Application (SSDA) (SSD-64916225) located on Dharug land at Western Sydney University Parramatta South Campus, 171 Victoria Road, Parramatta (the site).

The SSDA, as exhibited, sought approval for the construction of a new four (4) storey tertiary educational facility to accommodate the new Indigenous Centre of Excellence. The SSDA was publicly exhibited by the NSW Department of Planning, Housing, and Infrastructure (DPHI) from 20 August 2024 until 26 September 2024, with the subsequent request for response to submissions issued on 1 October 2024. Additional matters were raised by DPHI on 16 July 2025 and by Heritage NSW on 28 July 2025.

Overview of Agency Advice

In relation to the Public Exhibition of the SSDA, agency advice was received from the following:

- Department of Planning, Housing and Infrastructure (DPHI);
- Department of Climate Change, Energy, the Environment and Water (Biodiversity, Conservation and Science group; Water Assessments; Heritage NSW);
- Government Architect New South Wales (GANSW)
- Crown Lands;
- Fire and Rescue NSW;
- Heritage Council;
- NSW SES;
- Transport for NSW.

Overview of Submissions

In addition, a total of six (6) submissions were received during the Public Exhibition of the SSDA from the following:

- City of Parramatta Council (Council);
- Ampol;
- Endeavour Energy;
- Sydney Water; and
- Two (2) public submissions

Collectively, the agency advice and submissions made related to a range of matters including:

- Urban Design;
- Landscaping;
- Traffic, Parking, Access and Transport;
- Hazards and Risk;
- Heritage;
- Water Management;
- Water Supply;
- Energy Supply; and
- Mitigation Measures.

Actions taken since Exhibition

Following the Public Exhibition of the SSDA, the Applicant has undertaken further engagement with the key relevant authorities including:

- Engagement with Indigenous Communities
 - 29 August 2024: Community Engagement
 - 17 October 2024: Community Engagement
 - 29 November 2024: Elders Advisory Committee
 - 21 January 2025: Community Engagement
 - 7 March 2025: Elder’s Advisory Committee Meeting
- City of Parramatta
 - 28 October 2024: Flooding Meeting
 - 11 December 2024: Flooding Meeting
- Heritage NSW and DPHI
 - 29 October 2024: Site Inspection with DPHI
 - 28 January 2025: Site Inspection with Heritage NSW
 - 18 February 2025: Car park scope meeting with Heritage NSW

- 9 April 2025: Car park scope meeting with Heritage NSW
- 12 May 2025: Revised SSD scope meeting with Heritage NSW and DPHI
- 4 June 2025: Amendment Report discussion with DPHI
- Design Excellence Consultation
 - 28 January 2025: Design Integrity Panel Meeting

Project Amendments

Amendments to the proposal have been made to address the matters raised in relation to architecture, landscape and traffic. The design changes include:

- Internal building reconfigurations including:
 - Reconfigured theatre layout, including reorientation of seating, stage, rehearsal rooms and ancillary facilities.
 - Relocation of cinema/lecture from ground floor level to Level 1.
 - Rationalisation and integration of building services.
 - Minor shift in location of the loading bay with associated revisions to the turning area.
 - Minor revisions to the academic staff and student research areas, teaching and library space layouts, Outdoor Maker terrace area and amenities.
 - Minor increase in area dedicated for amenities and pedestrian circulation.
 - Revised roof form over amenities areas, stairs and lift overrun.
 - Revised skylight designs.
- Architectural and façade updates, including:
 - Revised external column base and column design.
 - Revised awning detail and structural support to now bring the building to the ground.
 - Inclusion of a motorised netting system to enclose the rooftop multipurpose court on occasion.
 - New clay shingle facade screening to conceal the pad mount substation.
- External and landscaping updates, including:
 - Revised wetland, swale, and flood storage to facilitate flood water conveyance around the building.
 - Revised path and ramp layouts.
 - Revised paved area to outdoor kitchen, additional play area, outdoor exhibition area.
 - Revised substation location, outdoor clinic area and outdoor studio/maker space.
 - Revised landscaped area to suit stormwater flow management measures.
 - Relocation of bicycle parking to the front entry off Fifth Street.
 - Removal of one viewing platform.
 - Revised tree locations and vegetation areas.
 - Revised ground floor understory design to be enclosed and inaccessible from the outside, including to prevent conveyance of water beneath the ground floor.
- Updated civil works, including:
 - Levels revised to suit ground floor design with subfloor void enclosed to address flood performance requirements.
 - Wetland size and shape updated.
 - OSD tanks removed with new raingarden added adjacent to the loading bay.
 - Internal stormwater drainage realigned to suit updated layout.
 - Existing Council managed drainage asset to be protected in place with new maintenance pits proposed.
 - Update to retaining walls adjacent to Bridge Street.
 - Existing vehicle crossing widened.
 - Two new car parking areas along Fifth Street comprising 107 spaces in the western car park and 181 spaces in the eastern car park, with a total of 18 light poles.

The proposed design changes have largely been made in response to the received agency advice and submissions during the exhibition period to address all matters raised. Where possible, additional consultation has occurred with the DPHI, NSW SES, City of Parramatta Council and Heritage NSW with respect to the design changes and revised project scope.

In the context of the wider SSD, it is considered that the suite of changes proposed to the new building are relatively minor and in keeping with the design integrity of the original proposal. The proposed changes to the building have been reviewed by the Design Integrity Panel established during the previous Design Excellence process undertaken prior to the preparation of this SSDA.

With respect to the revised scope of works to incorporate the new eastern and western car parks into this SSD, additional assessment is provided within the updated appendices, as well as within **Section 6.0** of this Report. Further consultation has occurred with DPHI and Heritage NSW and responses to comments provided are available within **Section 5.5** of this Report.

Further Assessment and Mitigation Measures

Further assessment of the amended proposed development has been undertaken by the expert project team as required. **Section 6.0** of this report provides an assessment of the revised proposal and generally concludes the following:

- The introduction of additional car parking capacity into the SSD will significantly alleviate any previous concerns regarding traffic generation impacts and loss of on-site car parking capacity.
- The proposed materiality of the car park will adopt a 'turf cell' ground coverage infrastructure system which allows for a permeable outcome that ensures biodiversity continues to thrive.
- The revised proposal is supported from a visual impact assessment perspective and has been assessed against the relevant principles of tenacity.
- The revised proposal results in an outcome that is supported by stormwater infrastructure devices that are able to suitably manage the flow of stormwater across the site.

Revised and addendum technical studies have been prepared where required to respond to matters raised in submissions and/or provide further assessment taking into account the proposed changes to the exhibited project. Where required, this assessment has informed updates to the project Mitigation Measures (included at **Attachment B**).

Conclusion

This Submissions and Amendment Report outlines the design changes and amendments that have been made following exhibition of the Environmental Impact Statement and in response to the submissions received. The design amendments have demonstrated that they would not impose any additional environmental impacts that cannot be appropriately managed or mitigated. The amended development remains consistent with the objectives of the exhibited development and is consistent with the project justification, including suitability of the site and the public interest.

1.0 Introduction

This Submissions and Amendment Report has been prepared by Ethos Urban on behalf of Western Sydney University (WSU) (the Applicant) for the Indigenous Centre of Excellence State Significant Development Application (SSDA) (SSD-64916225) located on Dharug land at Western Sydney University Parramatta South Campus, 171 Victoria Road, Parramatta (the site).

The SSDA was lodged with the Department of Planning, Housing and Infrastructure (DPHI) and was publicly exhibited for 28 days from 20 August 2024 until 26 September 2024. The subsequent request for a response to submissions was issued on 1 October 2024. Subsequently, agency advice was received, together with a total of six (6) submissions received from a variety of authorities/organisations, including a total of two (2) submissions received from members of the public. Additional matters were raised by DPHI on 16 July 2025 and by Heritage NSW on 28 July 2025.

This Submissions and Amendment Report provides an analysis of submissions, actions taken since public exhibition, the Applicant's response to submissions and provides an updated justification of the proposed development. It is accompanied by supporting information and technical reports (refer to the **Table of Contents**).

This Submissions and Amendment Report, as required under section 59(2) and section 37(6) of the *Environmental Planning and Assessment Regulation 2021* (EP&A Regulation), has been prepared in accordance with the DPHI's *State Significant Development Guidelines*, including *Appendix C – Preparing a Submissions Report* and *Appendix D - Preparing and Amendment Report*.

1.1 Exhibited Development

The SSDA, as exhibited, sought approval for the construction of a new four (4) storey tertiary educational facility to accommodate the new Indigenous Centre of Excellence. Specifically, the exhibited development sought consent for the following:

- Site preparation and civil works, including demolition of the existing car park, tree removal and installation of inground utility infrastructure services.
- Construction of a four (4) storey Indigenous Centre of Excellence encompassing:
 - Ground level facilities, including but not limited to a dedicated arrival area, outdoor amphitheatre, cinema and lecture theatre, performance space, artist studios and exhibition space. Associated workspaces, meeting areas, lounge areas and other amenities are to be provided throughout the ground floor.
 - First floor level upwards comprising dedicated educational facilities including library facilities, learning areas and teaching spaces.
 - Second floor level comprising staff / student foyer, offices, meeting rooms and collaboration spaces.
 - Third floor comprising a multi-functional recreational sports court, with associated ancillary amenities, alongside an astronomy garden.
 - Roof level plant and services.
- Building identification signage zones.
- Construction of internal driveway with hardstand area to provide 13 car parking spaces.
- Landscaping works to provide outdoor educational and recreational spaces.

An artist's impression of the development (as exhibited) is provided in **Figure 1**.



Figure 1 *Artist Impression of Indigenous Centre of Excellence as Exhibited*

Source: Jackson Clements Burrows Architects,

2.0 Analysis of Submissions & Agency Advice

This section analyses the submissions received by providing a breakdown of the type of submissions received and identifies the issues raised.

2.1 Breakdown of Submissions and Agency Advice

Subsequent to the Public Exhibition of the SSDA, agency advice was received, together with a total of six (6) submissions received from a variety of authorities/organisations, including a total of two (2) submissions received from members of the public. A breakdown of the government agencies and organisations submissions received is provided in **Table 1** below.

Table 1 Summary of Agency Advice and Submissions Received

Agency Advice received	
Department of Planning, Housing and Infrastructure	Comments for consideration.
Department of Climate Change, Energy the Environment and Water – Biodiversity, Conservation and Science group	Comments provided, no additional information required.
Department of Climate Change, Energy the Environment and Water – Water Assessments	Comments for consideration.
Department of Climate Change, Energy the Environment and Water – Heritage NSW	Comments for consideration.
Crown Lands	Comments for consideration.
Fire and Rescue NSW	Comments provided, no additional information required.
Heritage Council of NSW	Comments for consideration.
NSW State Emergency Service	Comments for consideration.
Transport for NSW	Comments for consideration.
Submissions received	
Ampol	Comments for consideration.
Sydney Water	Comments for consideration.
Endeavour Energy	Comments for consideration.
City of Parramatta Council	Comments for consideration.

Of the two (2) public submissions received, one (1) submission partially supported the proposed development but sought further clarifications, and one (1) objected to the application.

2.2 Categorising of Issues

A categorical summary of the issues raised in the submissions received is provided in **Table 2** below.

Table 2 Summary of Issues Raised

Category	Issue	Stakeholder
The Project	Built form	- City of Parramatta Council - DPHI
	- Lack of activation to Victoria Road - Design of the Victoria Road frontage - Street level perspectives and visual impact analysis - Architectural drawings	

	Signage Zones • Illumination of signage zones • Planning pathways for future signage installation • Signage zones on plans • Size, type and location	• City of Parramatta Council • DPHI • Endeavour Energy
	Public domain and land landscaping • Revised plans • Tree retention and provision of replacement trees • Increased landscape setbacks • Plant species • Opportunity for a vegetated riparian corridor • Trees located near electricity infrastructure	• City of Parramatta Council • DPHI • Endeavour Energy
	Civil Design • Relationship to swale and wetland pond • Drainage and stormwater pipe connections • Civil structure • Climate change 2070	• City of Parramatta Council • DPHI
	Heritage • Justification for number of spaces • Temporary nature of car park works • Impacts on the character of the SHR item • Further details required.	• Heritage NSW
Economic, environmental and social impacts	Traffic, Parking, Access and Transport • Loss of existing carpark • Construction of a pedestrian link • Travel mode share • Public transport capacity • Additional traffic generation and impact on local network • Improvements along Victoria Road	• City of Parramatta Council • DPHI • TfNSW • Public
	Flooding • Overland flow paths adequate to 1% AEP • 1D-2D TUFLOW modelling required • Flood storage • Climate change • Flooding impact methodology • Hazard Maps, Velocity Maps and Sensitivity Analysis required • Mitigation measures to flooding risk • Flood management plan • Shelter in place considerations • Consideration of the Draft Parramatta River Flood Study • Emergency Management Strategy	• City of Parramatta Council • DPHI • TfNSW • BCS • NSW SES
	Stormwater Management • Stormwater and drainage infrastructure design • Impact on Council's existing infrastructure • Maintenance plan • Stormwater assets plan • Detention ponds • Roof gardens • Discharge water quality	• City of Parramatta Council • NSW Department of Climate Change, Energy, the Environment and Water

	Groundwater	
	Water Sensitive Urban Design Water quality management plan	City of Parramatta Council
	Heritage - Update to the ACHAR - Potential Archaeological Deposits - AHIMS Search - Recommendations for project progression - Car park heritage assessment and impacts	Heritage NSW
	Infrastructure and Utilities - High voltage operational and maintenance protocol - Engage with an Accredited service provider - Augmentation or extension to an existing electricity distribution is required - Size and rating of voltage - New pad mount substation to be shown - Encroachment of building setbacks on the main building - Safety clearances	Endeavour Energy
Procedural matters	Land Ownership / Landowners Consent - Tenure to authorise use of Lot 101 and consideration of Native Title - Crown land consent required	- NSW Government Crown Land - DPHI
	Aboriginal Community Consultation - Additional documentation and receipt of consultation undertaken - Inclusion of Welcome to Country and a smoking ceremony at test excavations within the ACHAR - Test excavation methodology	Heritage NSW
	Mitigation Measures Provide a consolidated mitigations table that can be read as a standalone document	DPHI
	Conditions of Consent - Recommendations relating to the car park, bicycle parking, use of footpath and oversize vehicle access - Section 73 Certificate - Building Plan Approval (including tree planting guidelines) - Tree planting - Dial before you dig Australia	- City of Parramatta Council - Sydney Water - Ampol

3.0 Actions taken since Exhibition

Since lodgement of the EIS, additional environmental assessment and stakeholder engagement has been undertaken as outlined throughout this section.

3.1 Further Engagement Undertaken

Following the Public Exhibition of the SSDA, the Applicant has undertaken further engagement with the key relevant authorities, as described in **Table 3** below.

Table 3 Summary of Further Engagement Undertaken

Stakeholder	Engagement Undertaken
Department of Planning, Housing and Infrastructure and City of Parramatta Council	- On 28 October 2024, a meeting was held between the Applicant and GRC Hydro, the City of Parramatta Council Officers, DPHI, New South Wales State Emergency Service (SES), NSW Biodiversity, Conservation and Science, and NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW) in relation to the SSDA. - On 29 October 2024, DPHI undertook a site inspection. - A further meeting was held between the Applicant’s project team and the City of Parramatta Council on 11 December 2024 to discuss GRC Hydro’s flood model. It was hereby agreed that the GRC Hydro model was deemed the most appropriate to determine flood affectation on site. - On 12 May 2025, a further meeting was held between the Applicant, DPHI and Heritage NSW to discuss incorporating the car park into a revised SSD scope. - On 4 June 2025, a further meeting involved DPHI to discuss the format and inclusions of the Final Amendment Report.
Heritage NSW	- On 28 January 2025, Heritage NSW undertook a site inspection. - On 18 February 2025, a meeting was held between the Applicant and Heritage NSW to discuss the adjacent car park scope. - On 12 May 2025, a further meeting was held between the Applicant, DPHI and Heritage NSW to discuss incorporating the car park into a revised SSD scope. - On 28 July 2025, Heritage NSW provided initial advice on the Draft Amendment Package that was submitted as part of the TOA process to DPHI.
Design Integrity Panel	- The Government Architect New South Wales (GANSW) responded to the SSD-64916225 on 19th December 2024, recommending that the Design Integrity Panel (DIP) review the developed design prior to the lodgement of the Response to Submissions Report. - The Meeting with the DIP was held on 28th January 2025.
Engagement with Indigenous Communities	A series of meetings were held with the community, and the Elders Advisory Committee including: 29 August 2024 – Community Engagement 17 October 2024 – Community Engagement 29 November 2024 – Elders Advisory Committee 21 January 2025 –Community Engagement 7 March 2025 – Elder’s Advisory Committee

3.2 Project Refinements

In response to the matters raised in the submissions, and as a consequence of ongoing design development, the Applicant has refined the project for which consent is sought as described in **Section 4.0**.

3.3 Further Assessment

In response to matters raised in the submissions, and as a consequence of the project amendments described in **Section 4.0**, the Applicant has undertaken further environmental assessment of the project as outlined in **Sections 6.0** and **7.0**.

4.0 Description of Project Amendments

This section sets out the amendments made to the project since public exhibition of the EIS, which have been made as a result of ongoing design development and project refinement, and in response to matters raised in submissions.

4.1 Project Amendments Since Exhibition

Pursuant to section 37 of the *Environmental Planning and Assessment Regulation 2021*, an applicant may, at any time before a development application is determined, apply to the consent authority for an amendment to a development application. In order to respond to matters raised in this the submissions received, as well as a result of ongoing design development, a number of amendments to the project are proposed.

The project boundary area within the Campus has expanded slightly to incorporate additional development area to the south-west of the ICoE site so to include additional car parking spaces. The proposed development seeks consent for replacement car parking as a result of the loss of the P1 car park.

The proposed modifications to the development are described below in **Table 4**.

Table 4 Summary of Design Changes

Design Change	Explanation
Traffic – Additional car parking	
Expansion of project boundary area	In order to incorporate the car park scope into the SSD, it is proposed to expand the project boundary to incorporate the new eastern and western car parking areas. This results in an increase of 7,885m ² , resulting in a total project area of 20,035m ² .
New eastern and western car parks	In response to matters received during the exhibition period, and in consultation with Heritage NSW, it is proposed to incorporate additional car parking as part of this SSD. Therefore, revised changes include the creation of two separate replacement car parks involving the following works: - Western Car Park: - Removal of three (3) existing trees; - Earthworks, including site regrading comprising approx 310m³ cut and 190m³ fill; - Remediation works including a borrow pit with cap and contain of approx 1,300m³ - Installation of stormwater drainage infrastructure; and - Laydown of hardstand paving, turf cell infrastructure and line marking for 107 cars. - Installation of lighting across 8 poles. - Eastern Car Park - Removal of one (1) existing tree; - Earthworks, including site regrading comprising approx 940m³ cut and 110m³ fill; - Remediation works including a borrow pit with cap and contain of approx 1,000m³ - Installation of a 110kL detention tank and other new stormwater drainage infrastructure; and - Laydown of hardstand paving and turf cell infrastructure and line marking for 181 cars. - Installation of lighting across 10 poles. Comprehensive description of proposed car parking works are explained further at Section 4.4 of this report.
Architectural amendments – design and development	
Revised ground floor levels	In response to feedback from the City of Parramatta Council, NSW SES, and the DPHI, the ground floor slab design of the proposed ICoE building has been revised. The previous 'understorey' void design has been removed and levels have been revised so that it is now a fully enclosed ground floor that is inaccessible from the outside. As a result of this change, stormwater will no longer flow beneath the building. Instead, it will be redirected around the structure and managed through various WSUD devices and underground detention tanks.

Design Change	Explanation
Internal layout amendments	Internal layout of the ICoE building has been updated to reflect ongoing design and development changes. Key amendments include: - Revised performance theatre seating, stage, rehearsal, and facilities layout. - Slight relocation of the loading bay required to accommodate truck turning area and coordination of overhead awnings. - Cinema/Lecture theatre relocated from Ground Floor to Level 1. - Minor revision to the design of the outdoor amphitheatre seating layout. - Minor revision to the Level 1 teaching and learning spaces, as well as literature library area, including Outdoor Maker terrace area and amenities. - Minor revision to the Level 2 office and workplace layouts, as well as student lab in order to accommodate the re-located cinema and revised performance theatre layout. - Internal integration of mechanical services including rationalisation of Main Switch Room and Plant Room sizes on Level 1 and Level 2.
Rooftop amendments	A revised layout of rooftop floorplate is proposed in order to respond to the ongoing design and development of internal floorplate layouts throughout the building. Key amendments to the proposed rooftop include: - Integration of services in revised plant room. - Revised skylight designs. - Inclusion of BBQ area adjacent to the multi-purpose court. - Relocation of astronomy garden. - Minor revision of roof form over the Level 3 amenities area, stairs and lift overrun. - Removal of the previous weatherproof roof structure for the Multi-Purpose Court in lieu of a motorised net system to enclose the court. The net system will be vertically extendable up to a height of RL 29.62 at its maximum height. Fixed netting is proposed to extend to the parapet to enclose non-playing areas.
Revised column design	It is proposed to slightly revise the external column base and design by extending the footings from the ground floor level up to the underside of the façade screen in the 'Outdoor Function Space' and 'Outdoor Amphitheatre' parts of the elevation. Timber columns will remain where they can be protected from weather elements behind the shingle façade.
Landscape amendments – design and development	
Revised ground floor landscape design	The landscape design is also proposed to change slightly to align with the ground floor new levels, including revisions to pathways, ramping and planting to suit the proposed changes and appropriately align with new flood management requirements. Revised on site flood storage capacity through enlarged wetland design, altered central swale alignment and new raingarden in the north-east corner near the loading dock is proposed. response to the new ground floor levels.
Bicycle parking relocation	Redistribution of bicycle parking previously located in the north-eastern corner now proposed to at the new Victoria Road access path as well as the southern Fifth Street arrival zone.
Revised rooftop courtyard design	General revision to the landscape designs of the internal terraces as well as the rooftop astronomy garden to reflect ongoing design and development changes.
Civil infrastructure amendments	
Revise building foundations to prevent access beneath the building	Revision of the building foundation levels are required to be amended in order to suit the changes to the ground floor design with the new subfloor void now enclosed to address flood performance requirements. Therefore, revised volumes of cut and fill volumes are required and now result in 1,720m³ cut and 6,930m³ fill across the existing P1 car park / ICoE site.
Stormwater infrastructure amendments	In response to architectural and landscape design changes, the following revisions are proposed to stormwater infrastructure: Revised eastern wetland size and shape to accommodate diverted stormwater across the site.

Design Change	Explanation
	○ OSD tanks removed with new bio-raingarden added adjacent to loading bay. ○ Internal stormwater drainage realigned to suit updated landscape layout. ○ Existing 1200dia Council drain to be protected in place with new maintenance pits proposed.
Structural updates	The following civil amendments are proposed and are illustrated on an updated civil site plan, including: ○ Update to retaining wall design west of the site at parking area. ○ Widen existing vehicle crossing to minimum 7m at the Fifth Street kerb cross-over to access the primary ICoE development area.

4.2 Revised Proposal Overview

The proposal seek consent under Division 4.7 of the EP&A Act for the construction and operation of a four-storey Indigenous Centre of Excellence and associated car parking at the Western Sydney University Parramatta South Campus.

As a consequence of the project changes outlined in **Section 4.1**, the key project information has been updated and shown in ***bold italics***, as outlined in **Table 5**.

Table 5 Updated Key Project Details

Component	As Exhibited	Post-Exhibition
Project Summary	Removal of existing car parking and vegetation and construction and operation of a four-storey Indigenous Centre of Excellence at Western Sydney University Parramatta South Campus.	Removal of existing P1 car parking and vegetation and construction and operation of a four-storey Indigenous Centre of Excellence <i>and associated car parking</i> at Western Sydney University Parramatta South Campus.
Proposed Land Use	Tertiary educational and research facility, with ancillary uses including theatre and cinema which will enable the continued use of the site as a University.	No change.
Legal Description	Within Lot 100 in DP816829.	Within <i>part</i> Lot 100 and <i>part Lot 101</i> in DP816829.
Project Site Area	12,150m ²	<i>20,035m²</i> comprising: • 12,132m² (ICoE Site Area) • 4,716m² (Eastern Car Park) • 3,187m² (Western Car Park)
GFA	5,427.9m ²	<i>5,775m²</i>
Site Coverage	44%	44% (no change)
FSR	0.45:1	<i>0.47:1</i>
Maximum Height	RL26.956	<i>RL29.62 (including maximum extension of proposed basketball net enclosure)</i>
Car spaces	13 car parking spaces including 1 accessible parking space.	13 car parking spaces <i>within ICoE curtilage</i> including 1 accessible parking space. <i>288 replacement P1 car parking spaces including 1 accessible parking space.</i>
Bicycle Spaces	28 external bicycle racks.	28 external bicycle racks. (no change).

Component	As Exhibited	Post-Exhibition
Vehicular Access	Vehicular access will be provided by a new single vehicular cross-over accessed from Fifth Street at the south.	Vehicular access will be provided by three (3) new single vehicular cross-over accessed from Fifth Street.
Boundary Setbacks	- Northern: 2.83m - Eastern: 8.16m - Southern: 13.2m - Western: 33.76m - Western from Central Energy Plant: 4.78m	- Northern: 2.83m - Eastern: 8.16m - Southern: 13.2m - Western: 33.76m - Western from Central Energy Plant: 4.78m
Landscaped Area	7,555m ² (62%)	7,555m ² (62%) (no change).
Deep Soil Zone	6,157m ²	6,035m²
Canopy Cover	34%	44%
Tree Removal	52	55
Construction Jobs	340 full-time-equivalent	340 full-time-equivalent (no change, increased works staged sequential).
Operational Jobs	150 (full time employment)	150 (full time employment). No change.
Construction Staging	The works proposed as part of this SSDA will be carried out as a single stage.	Multiple stages are required to facilitate the construction of the new eastern and western car parks prior to the demolition of the existing P1 car park.
Construction Timing	Construction anticipated to commence in Q1 2025 and scheduled to be completed and operational by 2026.	Construction anticipated to commence Q4 2025 and scheduled to be completed and operational by late 2026.
Estimated Development Cost	Approximately \$83 million (excluding GST).	Approximately \$88 million (excluding GST).

4.3 Revised Project Description

This Submissions and Amendment Report proposes the following revised Project Description. The change includes the introduction of supplementary car parking to support the proposed development (shown in **bold, strike-through**).

- Site preparation and civil works, including demolition of the existing car park, tree removal and installation of inground utility infrastructure services.
- Construction of a four (4) storey Indigenous Centre of Excellence encompassing:
 - Ground level facilities, including but not limited to a dedicated arrival area, outdoor amphitheatre, **cinema and lecture theatre**, performance space, artist studios and exhibition space. Associated workspaces, meeting areas, lounge areas and other amenities are to be provided throughout the ground floor.
 - First floor level comprising **cinema and lecture theatre**, dedicated educational facilities including library facilities, learning areas and teaching spaces.
 - Second floor level comprising staff / student foyer, offices, meeting rooms and collaboration spaces.
 - Third floor comprising a multi-functional recreational sports court, with associated ancillary amenities, alongside an astronomy garden.

- Roof level plant and services.
- Building identification signage zones.
- Construction of ~~internal driveway with hardstand area to provide 13 new~~ car parking ~~spaces areas,~~ **including:**
 - **13 spaces adjacent to the new dedicated arrival zone for the proposed ICoE development,**
 - **107 replacement P1 spaces proposed in new western car park to the west of Bridge Street, adjacent to the existing oval,**
 - **181 replacement P1 spaces proposed in new eastern car park on the southern side of Fifth Street; and**
 - **Associated land remediation, civil and electrical works.**
- Landscaping works to provide outdoor educational and recreational spaces.

4.4 Proposed Eastern and Western Car Parking

4.4.1 Overview of Proposed Car Parks

It is proposed to incorporate additional works to facilitate two new car parks, effectively forming replacement P1 parking facilities. These will be known as the 'eastern' and 'western' car parks, accessed via Fifth Street, specifically comprising the following:

- Temporary Western Car Park:
 - Removal of three (3) existing trees;
 - Earthworks, including site regrading comprising approx 310m³ cut and 190m³ fill;
 - Remediation works including a borrow pit with cap and contain of approx 1,300m³;
 - Installation of stormwater drainage infrastructure;
 - Laydown of hardstand paving, turf cell infrastructure and line marking for 107 cars; and
 - Installation of lighting across 8 poles.
- Temporary Eastern Car Park
 - Removal of one (1) existing tree;
 - Earthworks, including site regrading comprising approx 940m³ cut and 110m³ fill;
 - Remediation works including a borrow pit with cap and contain of approx 1,000m³;
 - Installation of a 110kL detention tank and other new stormwater drainage infrastructure;
 - Laydown of hardstand paving and turf cell infrastructure and line marking for 181 cars; and
 - Installation of lighting across 10 poles.

Full details of the proposed car park works are set out in the documentation prepared by TTW including Civil Drawings (**Attachment K**). **Figure 2** below illustrates the new car parks.

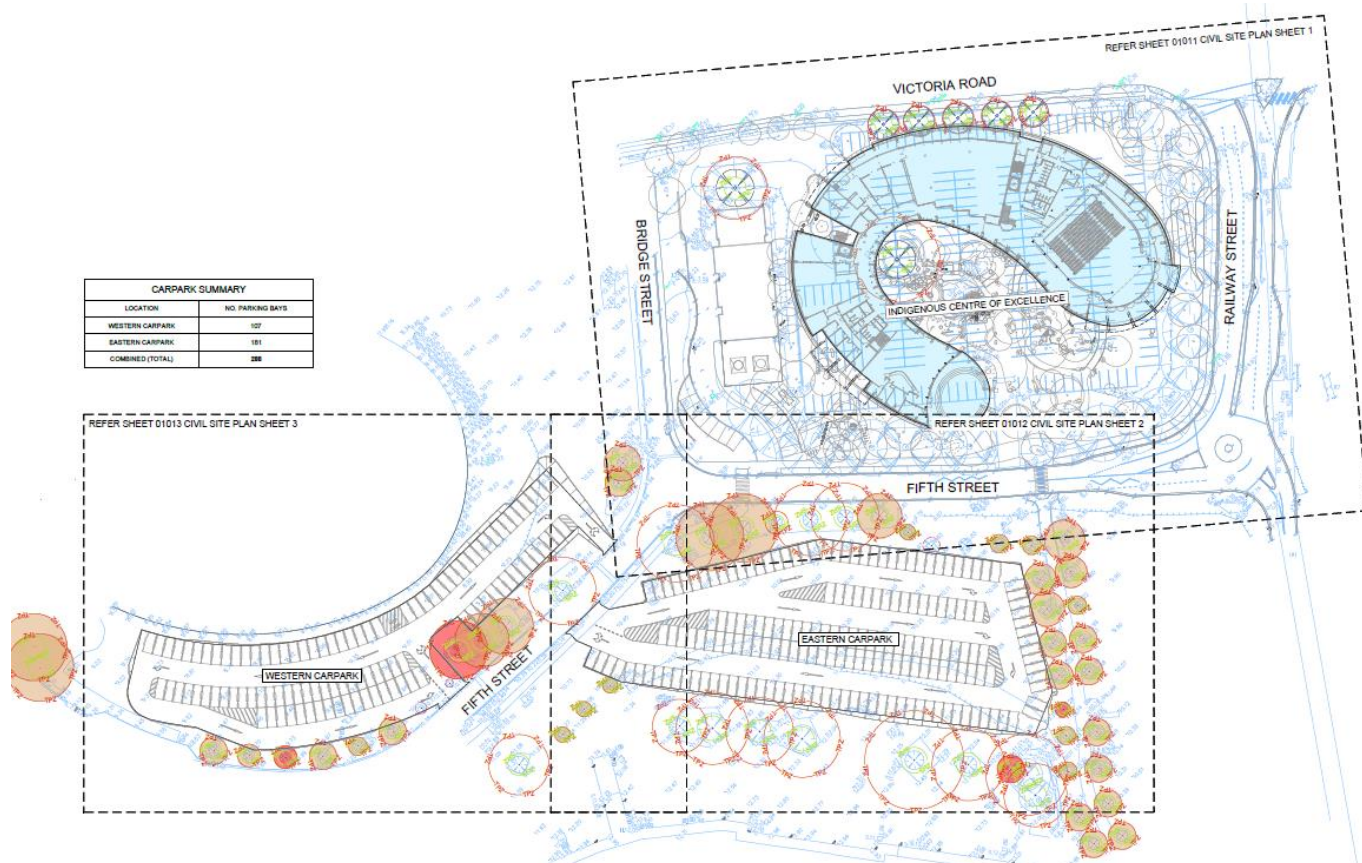


Figure 2 Proposed eastern and western P1 car parks

Source: TTW

4.4.2 Tree Removal

A total of three (3) trees are required to be removed to accommodate the new car parking areas. Of the total three (3) trees identified for removal, two (2) are located along the south-eastern boundary of the western car park, and one (1) is located at the northern boundary of the eastern car park. Refer to **Figure 3** on the following page.

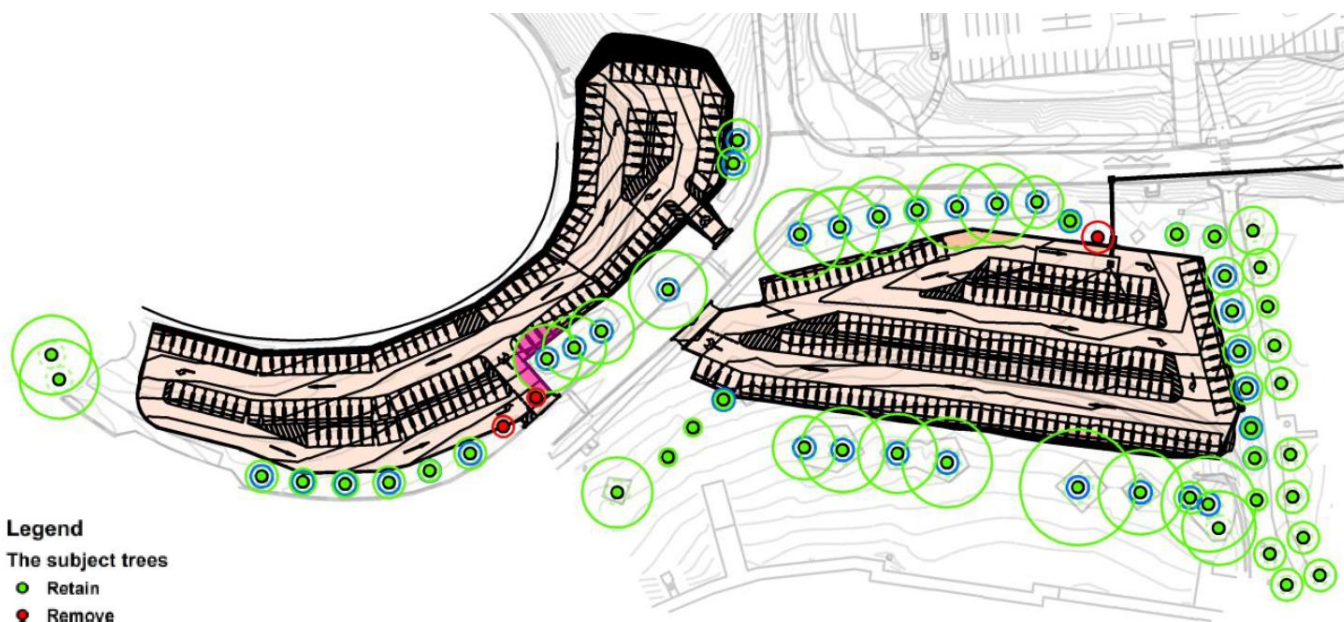


Figure 3 Trees to be retained and removed

Source: Tree Survey

4.4.3 Earthworks

Earthworks are proposed as a result of the need to re-grade part of the new car park areas to achieve suitable levels capable for vehicle use. A total volume of approximately 300m³ is to be filled and 1,250m³ is to be cut in order to accommodate adequate levels across both the eastern and western car park segments.

However it is noted that this is exclusive of the additional cut proposed of 1,300m³ and 1,000m³ to be overcut respectively, for the purposes of remediation in the 'burrow pit' arrangement discussed at Section 4.4.4.

The extent of cut and fill works is indicated in **Table 6** and also within **Figure 4** below.

Table 6 Proposed Cut and Fill Volume Estimations

Car Park Segment	Cut Volume Estimation	Fill Volume Estimation
Eastern Car Park	940m ³	110m ³
Western Car Park	310m ³	190m ³

Source: TTW

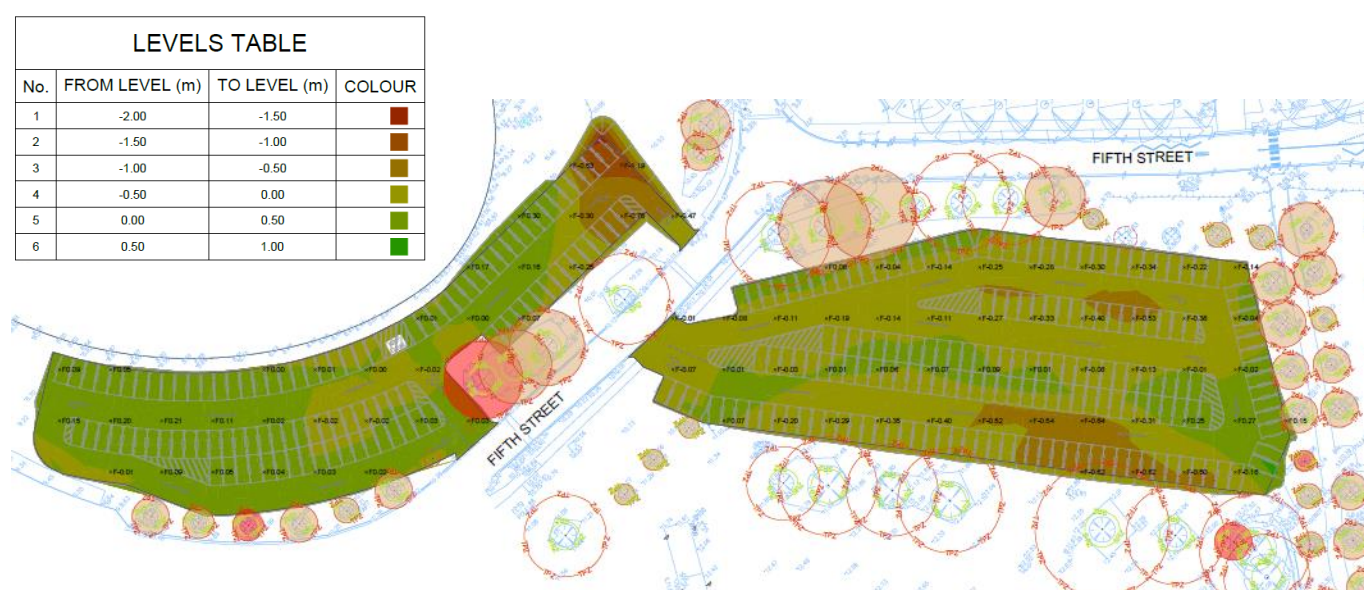


Figure 4 Proposed extent of car park re-grading

Source: TTW

4.4.4 Remediation

Remediation investigations have been undertaken within the development site by Douglas Partners as confirmed in the Remediation Action Plan prepared for the temporary car park works (**Appendix HH**). Whilst it has been previously confirmed that the ICoE building development area, does not require remediation and is suitable for the proposal, a general unexpected finds protocol and further waste classification of soils prior to off-site disposal was recommended.

With regard to the eastern and western temporary car park areas, contamination investigations (**Appendix HH**) has identified asbestos contamination (ACM) in soils (including detection above health screening levels at one location). On-site management techniques identified for asbestos this generally comprises capping of the asbestos contaminated materials either in their existing location or consolidation and capping in a containment area, known as a 'burrow pit'.

On this basis, two remediation pits have been proposed beneath both eastern and western car park, which includes excavation or 'over cut' of between -0.5m to -2.0m to enable up to 1.5m depth of potential ACM (with 0.5m of that as a contingency) and a suitable 0.5m top capping layer beneath the car park asphalt paving and turfcell system. Refer to the indicative section extract provided at **Figure 5**.

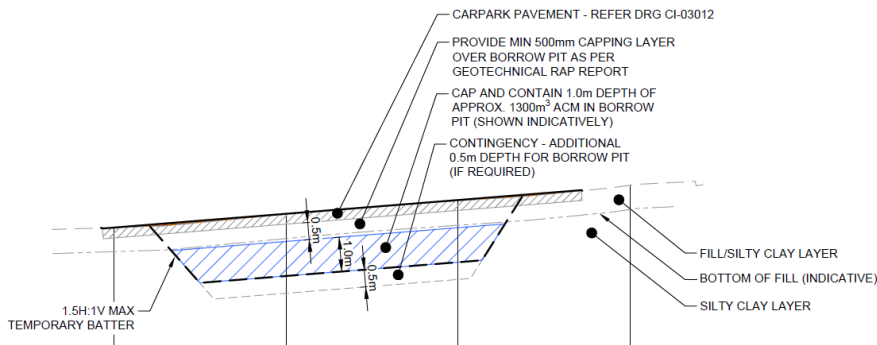


Figure 5 Proposed typical section of remediation 'burrow pit' design

Source: TTW

Subject to the detailed remediation procedures provided within the Remediation Action Plan at **Appendix HH**, Douglas Partners consider that the site can be made suitable for the proposed temporary eastern and eastern carparks.

Douglas Partners have recommended that a validation assessment report will be required to certify the remediation works. In addition, the validation assessment report may, require the subsequent implementation of a Long Term Environmental Management Plan. These recommendations have been applied as revised mitigation measures at **Appendix B**.

4.4.5 Stormwater Infrastructure

The proposed eastern and western car parks will involve new stormwater infrastructure to accommodate overland flows and altered drainage patterns.

At the western car park, no below ground detention tank is proposed. As the western car park will accommodate a topography with a natural slope towards the oval, six (6) new stormwater pits are proposed to accommodate stormwater drainage run off. Refer to **Figure 6** below.

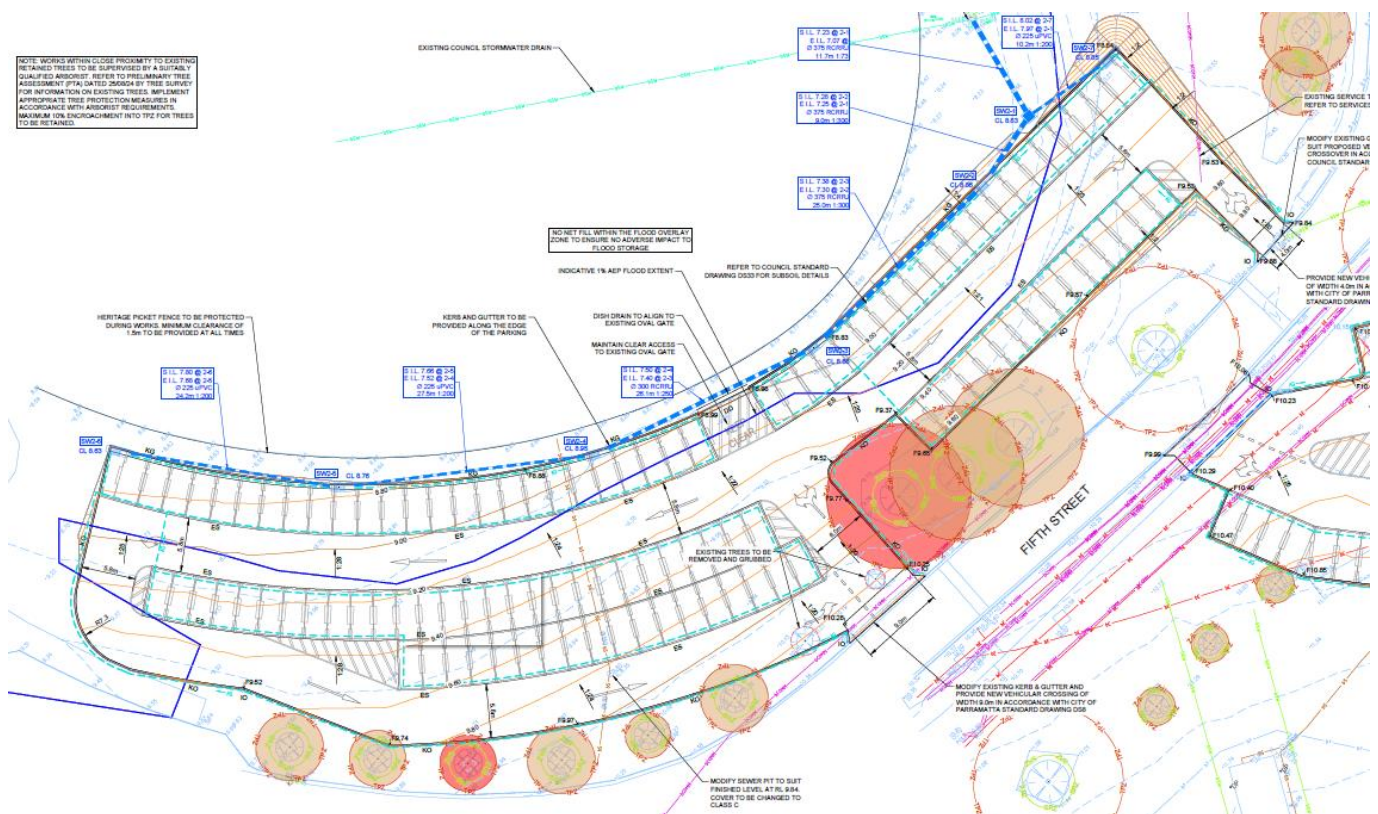


Figure 6 Stormwater and Drainage Detail – Western Car park

Source: TTW

At the eastern car park, an indicative 110kL below ground tank combined with above ground detention system is proposed. Two new stormwater pits are proposed to be constructed within the car park area which will discharge into the new tank. New stormwater piping will be installed from the proposed tank and along Fifth Street where it will connect into existing pits further east. Refer to **Figure 7** below.

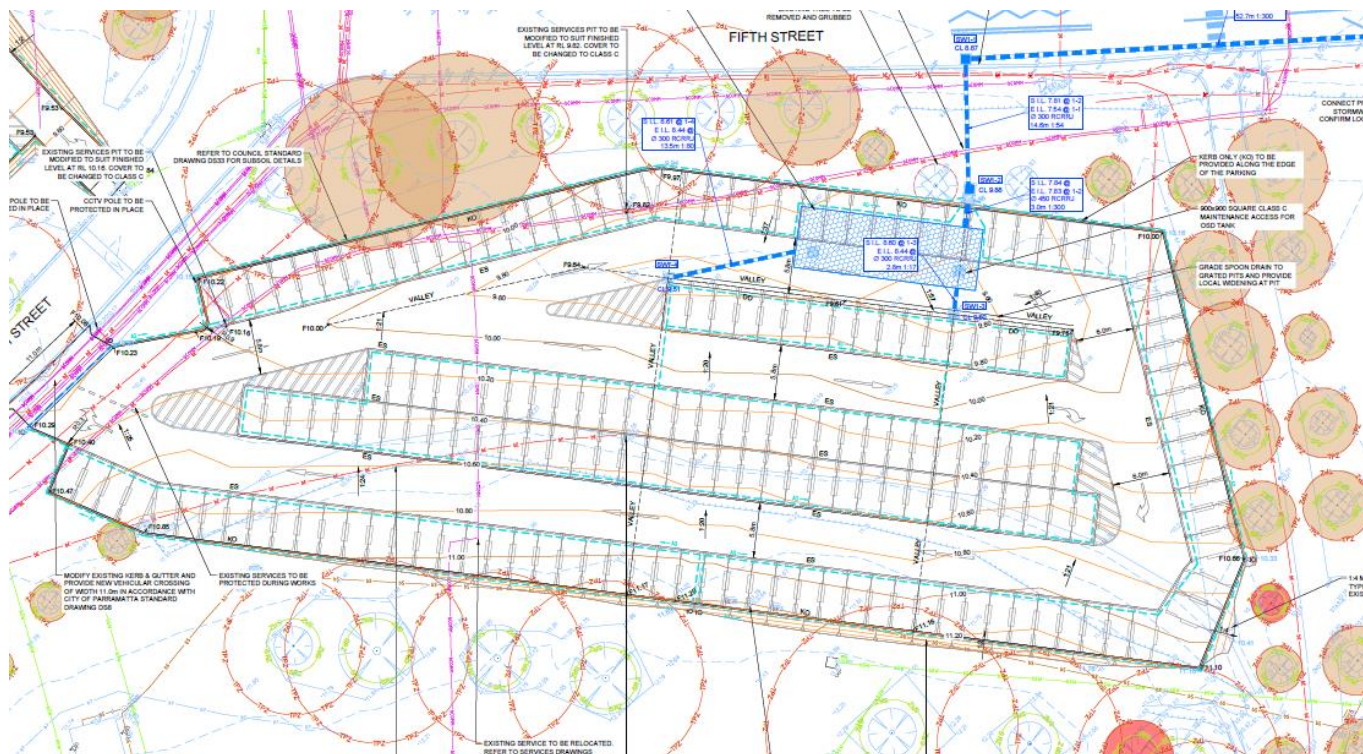


Figure 7 Stormwater and Drainage Detail – Eastern Car park

Source: TTW

Full details of the proposed car park works are set out in the documentation prepared by TTW including Civil Drawings (**Appendix L**).

4.4.6 Hardstand Materiality, Line Marking and Wheel Stops

The new car parks will involve the establishment of two hardstand car parking areas which will be predominantly comprised of asphalt, concrete and turf cell materiality.

New line marking will clearly delineate each car parking bay which are proposed to be 5.4m long and 2.4m wide. Wheel stops will be installed at the rear of each car parking bay in accordance with AS-2980. There are various components of each car park where vehicles are prevented from parking. These locations will be clearly demarcated by hatched areas fitted with appropriate parking barriers to prevent users from stopping a vehicle in these areas.

At the western car park, a hatched area will be line marked with 'KEEP CLEAR' in order to maintain pedestrian access to the oval.

4.4.7 Kerb Cross-Over and Access

Each car park is proposed to be accessed via new vehicular kerb cross-overs, accessed from Fifth Street. The western car park will facilitate two new kerb-cross overs from Fifth Street, with each serving a purpose as a one-way ingress or egress point. The eastern car park will facilitate a singular new kerb-cross over from Fifth Street, which will accommodate a two-way vehicular movement pattern in and out of this car park.

Pedestrian access to and from the car park facilities is provided via existing raised pavements along Fifth Street.

4.4.8 Traffic Signage

Safety signs to indicate direction, speed and right of way for traffic flow throughout the car park will be provided in accordance with the Australian Standards for Road Signs – Specifications AS1743-2001.

Table 7 below documents the type and number of ancillary signs that are required for the proposed car parks. Their proposed placements and locations within the new car parks are shown in **Figure 8** and **Figure 9**.

Table 7 *Sign types proposed*

Description	Sign Image	Amount proposed
Speed Limit		Eastern car park x 2
One Way		Eastern car park x 3 Western car park x 2
Right / Left Only		Eastern car park x 1 Western car park x 1
Give Way		Western car park x 1

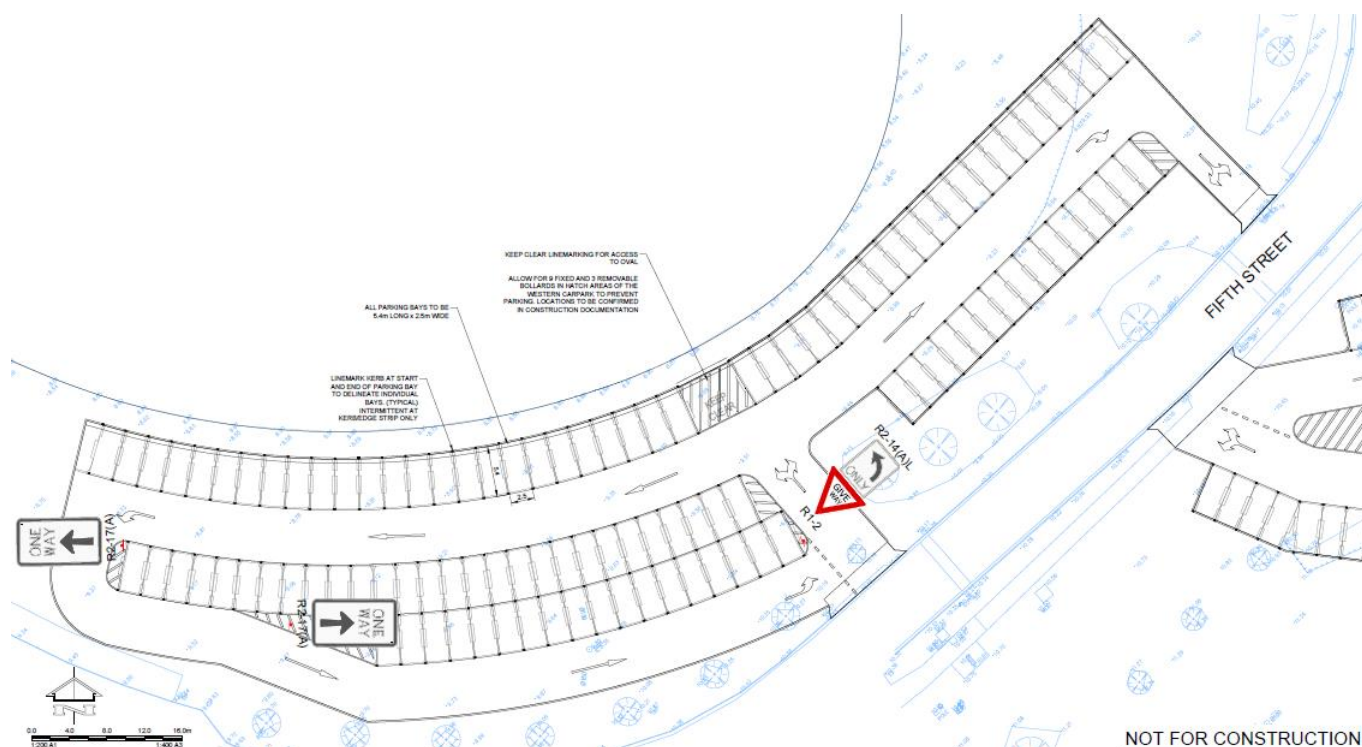


Figure 8 *Traffic Signage Plan Western Car Park*

Source: TTW

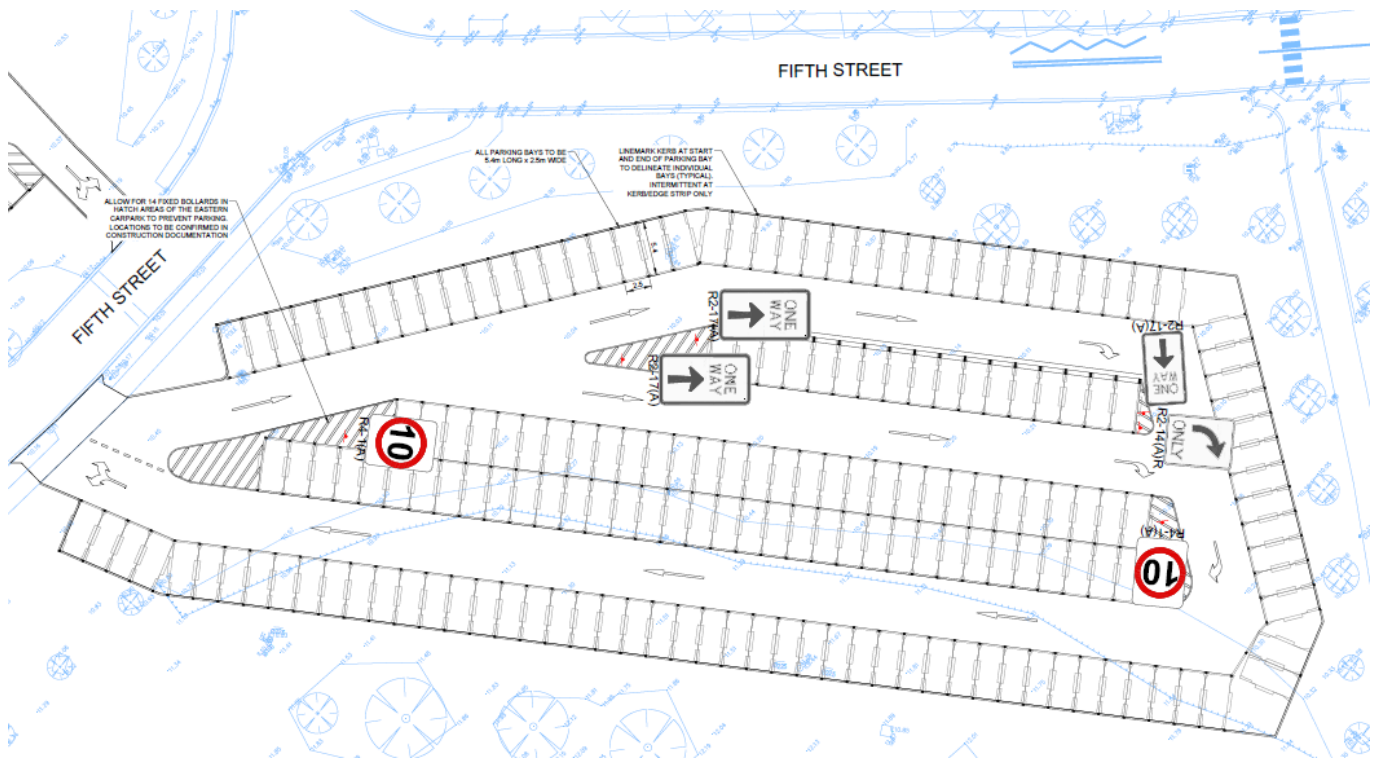


Figure 9 Traffic Signage Plan Eastern Car Park

Source: TTW

4.4.9 Lighting and Electrical Design

In conjunction with the new eastern and western temporary replacement car parks, safety lighting devices are proposed to be incorporated to sufficiently illuminate these vehicle movement and parking areas. A total of 18 light poles are proposed, with 8 poles distributed in the western car park and 10 poles distributed in the eastern car park. The light poles are proposed to be 12-metres in height, with either optic-controlled single or double luminaire heads.

The material palette for the light poles will consist of:

- Luminaire: Polyester powder coated aluminium in grey finish, PMMA optic and tempered glass.
- Pole: Standard high quality hot dip galvanised with additional dual coat powdercoat in grey, to match finish of luminaire or closest standard finish available.

4.4.10 Staged Construction

As the proposed ICoE is to be constructed on the site of the existing P1 car park, its capacity will be fully reinstated through two new car parks (eastern and western), delivered in stages.

These replacement car parks will be completed **before** demolition of the P1 car park begins, ensuring **no reduction** in overall campus parking capacity and removing the need for interim parking arrangements.

4.5 Updated Mitigation Measures

As a consequence of the project amendments described in **Section 4.1**, the matters raised in submissions discussed at **Section 4.4**, and the further environmental assessment outlined in **Section 6.0**, the Mitigation Measures for the project have been reviewed and updated. The updated Mitigation Measures are outlined in **Appendix B**.

5.0 Response to Submissions & Agency Advice

This section provides a detailed summary of the Applicant's response to the matters raised in submissions received. For ease of navigation and to reduce repetition, this section also addresses matters upon which DPHI have requested further information or clarification. The Applicant's responses are provided in the following sections and have been structured as follows:

- The project:
 - Built form (**Table 8**).
 - Signage Zones (**Table 8**).
 - Public domain and landscaping (**Table 8**).
 - Civil design (**Table 8**).
- Economic, Environmental and Social Impacts;
 - Traffic, Parking, Access and Transport (**Table 9**).
 - Flooding (**Table 9**).
 - Stormwater Management (**Table 9**).
 - Water Sensitive Urban Design (**Table 9**).
 - Heritage (**Table 9**).
 - Infrastructure and Utilities (**Table 9**).
- Procedural Matters:
 - Land ownership/ Landowners Consent (**Table 10**).
 - Aboriginal Community Consultation (**Table 10**).
 - Mitigation Measures (**Table 10**).
 - Conditions of Consent (**Table 10**).
 - Additional Documentation (**Table 10**).

A response to the public submissions has been summarised and provided at **Table 11** within this section.

A response to the TOA comments provided by DPHI and Heritage NSW during July 2025 are provided at **Table 12** within this section.

5.1 The Project

The Applicant's response to Issues related to the project are outlined in **Table 8** below.

Table 8 *Response to Issues related to the project*

Issue	Relevant Stakeholder	Response
Built form		
Council is supportive of the overall design of the building, however, would like to provide the following comments for consideration: - The proposed form essentially turns it back to Victoria Road, with little activation to this primary façade. Acknowledging the noise constraints of such a busy road, it is still considered valuable for the proposal to address this frontage and respond to the street. Consideration for additional pedestrian entries from Victoria Road to the internal space or a secondary entrance may assist opening this distinctive building to this frontage. - Further, the façade to Victoria Road has little articulation or modulation, despite a building length of approximately 100m along this frontage, which exacerbates the bulk of the building. While only four storeys at its highest, the largely blank façade creates the impression of a much larger scale, especially to pedestrians at ground level.	City of Parramatta Council	The proposed design has evolved with consideration to connectivity within the campus and internal pedestrian activation, as well as the site's key parameters including the retention and significance of the Melaleuca tree and Vineyard Creek. The building is oriented to provide an extension of the ecology of the creek and frame the Melaleuca tree which is proposed to be retained. The proposed landscaping along the northern boundary seeks to improve the activation and experience of movements along Victoria Road. Further to this, the building façade has been designed in consultation with, and supported by, the Design Integrity Panel. The material palette has been provided within the updated Architectural Plans package prepared by JCBA at Attachment C and D. Refer to the Response to Submissions letter prepared by JCBA for further discussions, provided at Attachment E.
Provide street-level perspective and additional visual impact analysis views from the northwest corner of the site to demonstrate appropriate built form relationship to the surrounding sites.	DPHI	Street-level perspective and additional visual impact analysis views from the northwest corner of the site have been provided in the updated drawings prepared by JCBA at Attachment C and Attachment D .
Provide revised architectural drawings to: Correct title boundaries of all lots.	DPHI	The architectural drawing package has been updated to reflect the correct title boundaries of all lots, provided at Attachment C and D .
The Department notes the addition of a fixed and height adjustable net enclosure over the rooftop multipurpose sports court, reaching a height of RL 29.62. Please	DPHI (via ToA)	The material, colour and finish of the netting have been set out in the updated architectural plans

clarify the proposed material, finishes and colour of the structure and provide an updated visual impact assessment to account for the additional structure.		provided by JCBA and included at Attachment C and D, with the material palette comprising: • Sports netting (black colour) • Metal (silver-grey colour) The updated Visual Impact Assessment prepared by Ethos Urban provides additional assessment to consider the visual impacts of the proposed netting. It concludes that the net enclosure does not cause any additional, significant, adverse visual impact. Refer to Attachment NN for further discussions.
Street-level perspective and additional visual impact analysis views from the northwest corner of the site have not been provided. Provide the additional street-level perspective, which includes the new rooftop net enclosure, demonstrating an appropriate built form relationship to the surrounding sites. All views are to be clear, taken from an eye-level perspective from the footpath opposite the site's street frontage, and accurately represent existing and proposed buildings and vegetation.	DPHI (via ToA)	This application is supplemented by updated street-level perspectives prepared by JCBA (Attachment C and D), alongside a Visual Impact Assessment Response to Submissions Letter (Attachment MM), an updated Visual Impact Assessment (Attachment NN) and a Visual Impact Photomontage and Methodology Report (Attachment OO). The updated Visual Impact Assessment prepared by Ethos Urban provides additional assessment to consider the impacts of the proposed netting. It notes that while the net enclosure is visible from the surrounding roads, it is considered that it can be viewed as an ancillary element to the wider Indigenous Centre of Excellence, which is semi-transparent and will predominantly be retracted, when not in use. Refer to Attachment NN for further discussions.
Signage Zones		
The proposed signage zone is of a significant size, taking up a considerable amount of the length of the Victoria Road façade and all the height of the proposed building. It is unclear in the documentation provided the size or type of signage being proposed, but there is the potential for this signage to eclipse the built form given the scale of the signage zone, which may not be sympathetic to the building form or the surrounding context. It is recommended the signage zone be reduced in size.	City of Parramatta Council	The proposed signage zone facing the Victoria Road frontage will provide an area for image projection onto the building zone. The signage zone will therefore not alter the built form. Refer to the architectural response letter prepared by JCBA at the time of original RTS (dated March 2025) Attachment E.
Provide additional information to enable assessment of the illumination of the signage zone with regards to Schedule 5 of the State Environmental Planning Policy (Industry and Employment) 2021 (Industry and Employment SEPP).	DPHI	No detailed signage installation is proposed as part of this SSDA. It seeks consent for signage zones only and will be subject to a separate approval process to

		obtain development consent for its installation and content. The fixed building signage zone is not proposed to be illuminated. The projection signage zone will comply with Schedule 5, Section 7 of the Industry and Employment SEPP, and the AS/NZS 4282. The projection signage zone, which will be subject to a future Development Application, will not exceed the maximum luminance applicable to the assumed environment zoning set out in AS/NZS4282 (Environmental Zone A3 Medium District Brightness). The illuminance of the future sign within the proposed zone will be limited to 250cd/m² and will not operate beyond 22:00 each night. Any illumination associated with the future sign within the proposed zone will be managed by a control system that will ensure these measures are achieved. Refer to the Façade Projection document prepared by Steensen Varming and included at Attachment II for further information. A comprehensive assessment as per Schedule 5 of the Industry and Employment SEPP has been provided at Attachment LL.
Noting Victoria Road is a classified road, provide details regarding the intended alternative planning pathway, the content and installation of the proposed signage, and an assessment against the relevant criteria under the Industry and Employment SEPP.	DPHI	At this stage, the SSDA seeks consent for signage zones only and the details of its future signage will be subject to a separate approval process, at which time a detailed assessment against the relevant criteria under the Industry and Employment SEPP will be provided. Notwithstanding this, an updated Industry and Employment SEPP Schedule 5 Assessment has been provided at Attachment LL for these signage zones. Additionally, refer to the Façade Projection document prepared by Steensen Varming which sets out the general parameters of the future signage (Attachment II).
Indicate the proposed location of signage zones on the plans and drawings.	DPHI	Refer to the proposed signage zones on updated architectural drawings prepared by JCBA provided at Attachment C and D. Detailed consent for the future signage within the proposed signage zones, including the method and content, will be via a

		separate DA. This is recommended as a mitigation measure at Attachment B .
The Architectural Drawings show 'Western Sydney University Signage' immediately adjacent to the front property boundary. The EIS indicates 'It is noted the existing Campus signage pylon sited at the intersection of Victoria Road and Railway Street at the north-east of the development footprint area will be retained' but does not appear to further address the additional signage.	Endeavour Energy	Refer to the proposed signage zones on updated architectural drawings prepared by JCBA provided at Attachment C and D .
Indicate the extent and location of the proposed signage zones on the Roof Plan.	DPHI (via ToA)	Refer to the proposed Roof Plan prepared by JCBA and provided at Attachment C and D .
Additional information and an assessment against the relevant criteria under the Industry and Employment SEPP have not been provided. Given the nature and considerable size of the projecting signage zone, an assessment against the consideration, including illumination, must be provided.	DPHI (via ToA)	While noting this application provides for the proposed signage zones only, a Façade Projection Assessment has been prepared by Steensen Varming to set out the general design and operational parameters for the future signage within the proposed zones (see Attachment II). Accordingly, an updated assessment against the relevant criteria under the Industry and Employment SEPP has been provided at Attachment LL .
The RtS report continues to refer to 'signage' instead of 'signage zones'. Please conduct an audit to ensure that the report consistently uses the term 'signage zones' only.	DPHI (via ToA)	This Response to Submissions Report has been updated in accordance with this comment.
Given the size and the illuminating nature of the projecting signage zone, discuss how it would be sympathetic to the building form or the surrounding context, as per Council's comment.	DPHI (via ToA)	As provided for in the Façade Projection Assessment prepared by Steensen Varming (Attachment II), the detailed design and content of the sign is not yet confirmed. However, it is anticipated that the projection signage zone will generally consist of a static projection of the display of Indigenous artwork, which is considered sympathetic to the overall building design as it is rooted in Connecting with Country design values as demonstrated through the Design Excellence process that has informed this SSDA. Accordingly, a further detailed assessment that considers the future signage content in accordance with the building form, will be provided as part of a separate DA process. Notwithstanding this, an updated assessment against the relevant criteria under the Industry and Employment SEPP,

		including how the signage zone will be sympathetic to the building form and surrounding context, has been provided at Attachment LL .
Public Domain and landscaping		
Revise Landscape Plans to: - include a scale bar on all drawings. - include indicative size and location of all civil structures (pipes, OSD, etc.) - Provide evidence the proposal incorporates Water Sensitive Urban Design principles.	DPHI	The Landscape Plans have been updated in response to this comment and are included at Attachment H and I .
The provided landscape plan and ecological plan have been reviewed and the following changes are suggested to be explored: - It is recommended that the footpath along the Fifth St verge is retained to enable retention of the Fig trees along the southern boundary, where possible. - Recommend an increased setback is provided to the significant tree 40 Melaleuca linariifolia (Snow-in-Summer) as the level of encroachment into the TPZ and canopy may be detrimental to the long-term survival of this tree. - The ground levels to the base of tree 40 should be retained with minor fill added to marry in with the soil depth at the base of the trunk. No soil build-up to the trunk or excavation should occur within the root zone. It is recommended replacement trees be: - provided in a minimum 100 litre container, - able to reach a minimum mature height of 13 metres, - be planted at minimum distances of 2 metres from any drainage line, - be planted a minimum 3.5m to the outside enclosing wall or edge of a legally constructed building, structure or proposed development. - Ensure the proposed plant species are appropriately located based on the solar access (sun/shade). - Some of the planting mixes contain trees which may cause a conflict with the building clearances or each other. These species should be reconsidered. - A plant schedule indicating suitable trees, shrubs, groundcovers - including the botanical and common names -, plant quantities, size of the containers at planting, and mature height and canopy spread is recommended. Consideration should be given to establishment of a vegetated riparian corridor along the western side of Vineyard Creek that adjoins the 'project site'. This would contribute to a positive overall landscape design and would improve the local wildlife/vegetation corridor along the creek. This would also contribute to offset the 12 mature Ficus hillii that are proposed to be removed.	City of Parramatta Council	For further detailed response, refer to the Response to Submissions letter prepared by JCBA provided at Attachment E .

The planting of large / deep rooted trees near electricity infrastructure is opposed by Endeavour Energy. Existing trees which are of low ecological significance in proximity of electricity infrastructure should be removed and if necessary replaced by an alternative smaller planting. The landscape designer will need to ensure any planting near electricity infrastructure achieves Endeavour Energy's vegetation management requirements.	Endeavour Energy	As referenced in the Response to Submissions letter prepared by JCBA (at the time of original RTS), there are no large / deep rooted trees proposed near electricity infrastructure. Refer to Attachment E for further details.
Civil Design		
Following a meeting with Council's catchment Engineers and the applicant, the following recommended civil design changes are reiterated: • Suspended slabs are not supported for overland flow flood mitigation. • Building over the existing Council Stormwater pipe is not supported as this does not allow access for maintenance in the future. This pipe must be relocated by the applicant with a set of civil and design drawings of the relocated pipe submitted as part of this application. It should be shown on architectural and landscape plans to ensure that there is no future conflict. • Unobstructed overland flow paths must be provided for the 1% AEP flow event. Council recommends that a further meeting is held with us to discuss these requirements prior to the submission any Response to Submissions report.	City of Parramatta Council	The proposed design has been revised to a slab on ground system with the subfloor void filled in to avoid overland flow and flood water below the building. The existing Council Stormwater pipe will be retained and protected with new maintenance pits either side. Refer to the updated Civil Drawings included at Attachment K. The only overland flow path through the site comes via a swale that carries water from the oval and into the north-western corner of the site. The proposed design will not result in an adverse impact to the oval nor the flowpath upstream of the site. Refer to Attachment M for further discussions.
Correct the following: • Civil drawings to show stormwater pipe work to connect to the existing grated pit at the northwest corner, which is shown to be demolished on the architectural plans. • Discrepancies between civil drawings as well as architectural and landscape plans (for example, civil plans show an additional structure adjacent to the new driveway, which is omitted from the architectural plans and the Landscape Plan shows three new trees to be planted at the same location). • Provide indicative size and location of all civil structures (pipes, OSD, etc.).	DPHI	Refer to the updated Civil Drawings included at Attachment K.

5.2 Economic, environmental and social impacts

The Applicant's response to the submissions related to the economic, environmental and social Impacts of the development are outlined in **Table 9** below.

Table 9 Response to issues related to Economic, environmental and social impacts

Issue	Relevant stakeholder	Response
Traffic, Parking, Access and Transport		
The Traffic Impact Assessment states that there is a separate proposal to reinstate all parking that will be lost as part of the proposed development. This report states that the reinstatement will be prior to commencement of construction of the proposed development. A condition should be imposed on any consent to ensure this occurs. It is noted that should the parking not be reinstated, staff and students may overflow onto nearby on-street locations and therefore affect the amenity of the area.	City of Parramatta Council	This Submissions and Amendment Report has been prepared partly under Section 37 of the EP&A Regulations 2021 to incorporate the new car park works into the broader SSDA. Section 6.0 of this report provides additional details and justification for these new car parks, and the civil design of the car parks are provided for in Attachment K .
There is an existing approved DA (DA/346/2022) that will provide footpath access from the active transport link to the proposed building. Given that the proposal will increase the GFA within the campus, and thereby staff and student capacity, measures to promote sustainable transport options are considered important in order to reduce private vehicle use. As such, a condition should be included that would require the construction of the pedestrian link prior to issue of an Occupation Certificate for this application.	City of Parramatta Council	It is noted that a pedestrian link providing access from the ATL to the proposed ICoE has been recently constructed, separately to DA/346/2022, and is currently functional. An updated Green Travel Plan provided at Attachment Q refers to the use of the link to encourage sustainable modes of transportation to and from the site. As such, no condition is considered necessary given the existing access.
P1 Replacement carpark - The intended car parking reinstatement in proximity within the WSU Parramatta South Campus is considered a likely consequence of the proposed development, and its impact must be considered under Section 4.15 of the EP&A Act, even though it results from an activity that is not itself the subject of the relevant development application. - Identify and address the cumulative impacts (including incremental and combined effect) of the consequential development with the proposed development on each relevant matter and provide a detailed assessment of cumulative impacts on any key issues identified. For example, the development footprint of the indicative location of the reinstatement encompasses a landscaped area and several existing trees, which would result in the loss of open space, tree canopy coverage, and potential impacts on biodiversity value. - Clarify the status and timing of the reinstatement of car parking and any interim parking provisions and/or other mitigation required.	DPHI	This Submissions and Amendment Report has been prepared partly under Section 37 of the EP&A Regulations 2021 to incorporate the new car park works into the broader SSDA. Section 6.0 of this report provides additional details and justification for these new car parks, and the civil design of the car parks are provided for in Attachment K .

Travel mode share Amend and confirm the travel mode share. The Transport and Accessibility Assessment (TAIA) states a 42% mode split for cars only while the Strategic Travel Demand and Parking Provision Analysis (STDPPA) states a 54% mode split for private car usage for the project.	DPHI	The Transport and Accessibility Impact Assessment (Attachment P) sets out the justification for adopting the 42% mode split for cars only, owing to the travel mode survey from the Strategic Travel Demand and Parking Provision Analysis and TTW's historic car park usage study and shuttle bus survey. Notwithstanding, TTW have prepared new Section 1.7 in the updated TAIA (Attachment P) that provides a comprehensive Response to Submission that provides an assessment against the higher 54% car mode split, which concludes that across both day and night, and weekend events, the increases in parking demands can still be comfortably accommodated within the existing vacancy across the University car parking facilities. Refer to section 1.7 of Attachment P for further information.
Traffic Generation during events - Provide a Preliminary Event Traffic and Transport Management Plan (PETTMP) for events held at the site. The PETTMP must detail, but not limited to: - Measures to ensure public transport capacity is sufficient for each event type and time period, taking into consideration assumed mode shift. The PETTMP should consider that each event will have a specific modal share, i.e. some events will generate more car traffic than daily campus activities and other events. - Mitigation measures to manage the impacts of events on the classified and local road networks. (e.g. public communications, road closures, or car parking strategies, including access management measures) - Management of pedestrian flows to mitigate potential vehicle and pedestrian conflicts.	DPHI	As noted within Section 1.7 of the revised TIA (Response to Submissions section) prepared by TTW (Attachment P), the Preliminary Event Traffic and Transport Management Plan is requested to be provided as a condition to the consent, with a timeframe prior to occupation. Owing to the reasoning provided within the Response to Submissions, it is not deemed appropriate that the preparation of the Preliminary Event Traffic and Transport Management Plan delay the approval of the application.
The planned replacement car park will be completed prior to the ICoE. Due to the high parking demand at WSU it is very important that the replacement be delivered to alleviate any potential impacts on surrounding residents.	TfNSW	Noted and agreed. The new eastern and western car parks will either be completed prior to the demolition of the existing P1 car parks or timed to suit semester break times where parking demand is significantly reduced. Refer to the Parramatta South Temporary Carpark Strategy prepared by Western Sydney University Attachment T) which

		outlines the car parking strategy and commitments.
Particular event days will generate a traffic generation potential of approximately 284 extra vehicles accessing the university, which represents a very significant parking demand and event management. DPHI should be satisfied that the development's Plan of Management (PoM) minimises the impact of traffic generation impact to the classified and local road networks on special event days during peak periods, with coordination with Rosehill Gardens for weekend events.	TfNSW	As noted within Section 1.7 of the revised TIA (Response to Submissions section) prepared by TTW (Attachment P), the Preliminary Event Traffic and Transport Management Plan will be provided as a condition of consent. TTW provide a full response to this comment in section 1.7 of their report (Attachment P). This type of management plan should not fundamentally impact the outcome of the SSDA assessment. Importantly, it is noted that there is sufficient car parking capacity within the proposed new eastern and western on-site car parks, proposed as part of this Submissions and Amendments Report.
TfNSW is currently undertaking investigation for long term transport improvements along Victoria Road. Further information regarding the vision for Victoria Road can be obtained by visiting the project website at https://www.transport.nsw.gov.au/projects/current-projects/victoria-road-vision .	TfNSW	Noted.
The service road appears that this may cross the property boundary close to the loading bay entry. The Consent Authority should ensure the development is wholly within the property boundary and does not encroach into the road boundary.	TfNSW	Under Section 69A of the <i>Crown Land Management Regulation 2018</i>, landowners consent from the Minister for Lands and Property is not required for the following: (a) a development application for State significant development, (b) a development application lodged by, or on behalf of, a public authority. (2) Subclause (1) extends to a development application lodged, but not determined, before the commencement of this clause. Following an approval, the Applicant will apply for a licence for part of Lot 101 DP816829 to authorise any approved ground works. Refer to Attachment VV which provides correspondence from Crown Lands on the matter.
Appendix F to the RtS Architectural Response to Submissions letter states that the new pedestrian link approved under DA/346/2022 has already been constructed. The RtS report	DPHI (via ToA)	The existing pathway was constructed previously via separate exempt development works by WSU

states that works were undertaken in lieu of the Development Application. Appendix W of the RtS report contains photos of constructed pathways. Please clarify whether it is intended to carry out the works approved DA/346/2022 or provide details of the works that have been completed instead. Additionally, please update the relevant supporting documents, including the previous traffic impact assessment, to ensure consistency.		and therefore the approved design as per DA/346/2022 consent will not be activated. Reference to this approved DA has been removed from the relevant documentation, including the TAIA, Construction Traffic Management Plan and this Submissions and Amendment Report.
The revised Civil Site Plan includes two new parallel parking bays along Fifth Street. Please clarify if this is part of the SSD application. If it is, update the architectural and landscape drawings to ensure consistency. If it is not part of the application, remove the works from the drawings and application.	DPHI (via ToA)	The two parallel parking bays previously identified along Fifth Street have now been removed in the Civil Plans (refer to Attachment K).
The Swept Path Analysis in the construction traffic management plan for the 20m semi-trailer does not show an available access point to enter the site. Please provide a revised Swept Path Analysis to ensure sufficient manoeuvring space for a 20m semi-trailer.	DPHI (via ToA)	A revised Swept Path Analysis has been provided in the Construction Traffic Management Plan to ensure sufficient manoeuvring space for a 20m semi-trailer. See Attachment R for further details.
Flooding		
The proposed swale leading to the wetland pond may have to be revised based on above comments.	City of Parramatta Council	The proposed swale has been revised in response to this comment. Refer to Attachment N for further details.
Investigate and incorporate design to alleviate flooding issues at Victoria Road adjacent to the subject site and drainage adequate to the current standard as mentioned in item 2 below.	City of Parramatta Council	The revised design has improved flow conveyance along the north of the site to lessen flood issues at Victoria Road. Refer to Table 1 In 'Item A' of the updated Flood Impact Assessment prepared by GRC Hydro at Attachment N for further details and response to this specific comment.
As the subject site is highly impacted by flooding, overland flow paths need to be identified and quantified to ensure appropriate flooding and overland flow path management. Overland flow paths should be safe and adequate up to 1% AEP (with climate change and rainfall calibration), however adequacy for conveyance should be available for higher storm events up to PMF.	City of Parramatta Council	There is only one overland flow path through the site and the proposed design will only create minor impacts to the flow behaviour which are limited to the site itself. Refer to Table 1 In 'Item A' of the updated Flood Impact Assessment prepared by GRC Hydro at Attachment N for further details and response to this specific comment..
A detailed 1D-2D TUFLOW model needs to be developed for the site area for both pre-development condition and post development condition to demonstrate that there will be no impact due to the proposed development and flooding & overland flow paths are safely managed. Council can provide a copy of its flood model for this location to assist the applicant's consultant set up of their pre-developed hydraulic model for this location. A formal	City of Parramatta Council	A detailed 1D-2D TUFLOW model has been developed for the site, in consultation with Council. Refer to Table 1 In 'Item A' of the updated Flood Impact Assessment prepared by GRC Hydro at

request will need to be submitted to Council and a processing fee for this information will be charged in accordance with Council's Fees and Charges.		Attachment N for further details and response to this specific comment.
Currently, the subject site is also functioning as flood storage. Loss of existing flood storage needs to be incorporated in the design.	City of Parramatta Council	While the cut and fill works result in a 950m ³ loss of flood volume in a 1% AEP event, the design has improved flow conveyance, to which modelling identifies no adverse impact to off-site flood levels. Refer to Table 1 in 'Item A' of the updated Flood Impact Assessment prepared by GRC Hydro at Attachment N for further details and response to this specific comment.
Climate change scenario with sea level rise should be included in accordance with the latest industry guidelines, especially Australian Rainfall & Runoff.	City of Parramatta Council	Two climate change scenarios with sea level rise have been included in the modelling for this project. Refer to Table 1 in 'Item A' of the updated Flood Impact Assessment prepared by GRC Hydro at Attachment N for further details and response to this specific comment.
As part of Parramatta River Flood Study, it was identified that ARR2024 rainfall and methodology is providing lower flowrates than experienced and calibration of the model to match with the Flood Frequency Analysis was required. A separate advice will be provided in relation to the calibration methodology. This should be included while undertaking flood impact assessments.	City of Parramatta Council	A 1% AEP design scenario with an additional 19% rainfall loading has been modelled. Refer to Table 1 in 'Item A' of the updated Flood Impact Assessment prepared by GRC Hydro at Attachment N for further details and response to this specific comment.
Afflux Maps (Post-Development Scenario minus Pre-Development Scenarios) need to be prepared, and no impact should be demonstrated considering 1%, 5%, 10% & 20% and PMF storm events.	City of Parramatta Council	Flood level impacts (afflux) for the 1% AEP event have been shown to demonstrate compliance. Refer to Table 1 in 'Item A' of the updated Flood Impact Assessment prepared by GRC Hydro at Attachment N for further details and response to this specific comment.
Hazard Maps as per ARR2019 should be included.	City of Parramatta Council	Hazard Maps as per ARR2019 have been included in the lodgement package. Refer to 'Item A' of the updated Flood Impact Assessment prepared by GRC Hydro at Attachment N for these maps.
Velocity Maps should be included.	City of Parramatta Council	Velocity Maps have been included in the lodgement package.

		Refer to 'Item A' of the updated Flood Impact Assessment prepared by GRC Hydro at Attachment N for these maps.
Sensitivity Analysis a) Blockage 100%, 50% & design blockage for stormwater pipes b) Climate Change (ARR2024) c) Downstream Boundary Condition d) Loss Parameters e) Others parameter as required.	City of Parramatta Council	A sensitivity analysis has been undertaken and concludes that there will be no impacts at the subject site. Refer to 'Item A' of the updated Flood Impact Assessment prepared by GRC Hydro at Attachment N for additional sensitivity analysis.
An electronic copy of TUFLOW Model with all relevant files with a brief report outlining model inputs, boundary conditions, assumptions, impact analysis, pre-development and post-development comparison flows & levels at relevant locations, overland flow paths and flood storage changes, results, and recommendations must be provided.	City of Parramatta Council	Refer to Table 1 in 'Item A' of the updated Flood Impact Assessment prepared by GRC Hydro at Attachment N for further details and response to this specific comment.
The recently adopted PRFS 2024, advises flood planning area and flood planning level. Flood Planning Level adopted is 1% AEP + 2150 Climate Change with RCP 8.5 + Rainfall Calibration + 0.5m Free Board. Any changes in adopted flood planning level will not be supported. A formal flood enquiry application needs to be submitted to Council to receive flood information. A separate request needs to be submitted for electronic copy of model set-up files. Note that there will be charges for flood enquiry application and for model set-up files.	City of Parramatta Council	Following engagement with Council on 12th December 2024, the model adopted by GRC Hydro has been deemed the most appropriate to use to determine flood affectation and development impacts on site. Refer to Table 1 in 'Item A' of the updated Flood Impact Assessment prepared by GRC Hydro at Attachment N for further details and response to this specific comment.
Provide an adequate Flood Emergency Management Plan that is consistent with SES Flood Emergency Plan and with local emergency plans.	City of Parramatta Council	A Preliminary Flood Emergency Response Plan has been incorporated in the updated Flood Impact Assessment prepared by GRC Hydro. Refer to Attachment N for further details.
In consultation with Council, provide a revised FIA that adopts the endorsed flood modelling and mapping in the 2024 Parramatta River Flood Study and incorporates the advice of key agencies including NSW State Emergency Service (NSW SES) and DCCEEW BCS.	DPHI	Following engagement with Council on 12th December 2024, the model adopted by GRC Hydro has been deemed the most appropriate to use to determine flood affectation and development impacts on site. An updated Flood Impact Assessment has been provided, included at Attachment N.
In consultation with Council and the NSW SES, provide a revised Flood Emergency Response Plan that is based on the revised FIA and includes current NSW SES terminology and procedures. • Should shelter in place be considered, demonstrate that evacuation off-site (the primary emergency management strategy) been investigated and determined to be	DPHI	A Flood Emergency Response Plan has been updated and included in the Flood Impact Assessment provided at Attachment N . Shelter in Place has been deemed the most appropriate

unachievable including consideration of early warning system available within the catchment and if they provide sufficient warning to evacuate the site.		emergency response to a flooding event, with stairways provided to encourage vertical evacuation. Refer to Section 7 in Item A of the revised FIA at Attachment N .
Should shelter in place be considered, the structural design must be constructed to maintain structural integrity during a PMF event – evidence to be submitted from a certified engineer.	DPHI	TTW has nominated SIP as a residual strategy which is considered by GRC Hydro in the updated FIA prepared for the revised scheme at Attachment N .
The site is affected by local overland flow and mainstream flooding from Vineyard Creek. Flooding from the Parramatta River would also affect the site, although this may only be during larger events. The Parramatta River Flood Study (PRFS, Stantec, 2024) was exhibited in draft form in 2023 and adopted on 11 June 2024, which is acknowledged in the EIS. It should be noted that the PRFS was calibrated through an extensive process. The PRFS shows substantially different levels and hazard to the FIA, which the EIS suggests would be investigated at the “post-lodgement stage”. The site is mapped as including floodway and flood storage from the 20% AEP event. The FIA has not considered flood function. The FIA therefore requires substantial revision to comply with the SEARs. BCS notes considerable residual risks are associated with this development as proposed, particularly in relation to lack of access and isolation.	BCS	Following engagement with Council on 12th December 2024, the model adopted by GRC Hydro has been deemed the most appropriate to use to determine flood affectation and development impacts on site. Floodway modelling has been undertaken in accordance with the GRC Hydro model, which confirms that the proposed development is identified within a floodway. Refer to Table 1 In Item A of the updated Flood Impact Assessment which provides a full response to this comment, prepared by GRC Hydro at Attachment N.
BCS requests further detail on the nature of consultation rooms and the outdoor clinic indicated on the ground floor. Medical uses are considered sensitive and should be specifically identified. <u>Recommendation:</u> The proposal should provide further detail on the nature of the consultation rooms and outdoor clinic and identify medical uses on plans.	BCS	The Indigenous Centre of Excellence in partnership with Western Sydney University Schools and Institutes will deliver University programs and outreach services to provide a range of culturally safe and supportive community services to Indigenous communities. These programs and services will be delivered through the Indigenous Centre of Excellence Care Space, and may include: • <i>Legal Services:</i> provision of legal support and advice to Indigenous peoples including assistance with legal issues, advocacy, and access to justice. • <i>Financial Services:</i> financial literacy programs, financial counselling, and support in managing money and personal finances.

		• <i>Wellness Programs</i>: holistic wellness through various programs. These initiatives will utilise partnerships and University students on practical placements to offer these services and programs from the Indigenous Centre of Excellence Care Spaces. The Care Spaces also feature a discrete private entrance for people to use to access these services. The specific services available may be subject to change once the Centre is operational, and scheduled programs and services may be provided on rotation.
The PRFS indicates that significant flooding of the development site would occur from at least the 20% AEP event. In the PMF, floodwater would inundate the ground floor to a depth in the order of 1.5 m, which is considered high hazard. High hazard floodwater would also be present on evacuation routes. The PRFS indicates that access to the site would be lost from at least the 20% AEP event. More frequent events are not available in the published study. However, more frequent events were modelled for the PRFS and should be available in the Council flood model. Recommendation: The FIA is updated to include more frequent events as outlined in above comment.	BCS	Following engagement with Council on 12th December 2024, the model adopted by GRC Hydro has been deemed the most appropriate to use to determine flood affectation and development impacts on site. The GRC Hydro model has been updated to include a series of design events and the Flood Impact Risk Assessment has been updated accordingly. The report concludes that the impact of the proposed development on flood affectation will be contained within the site and a Flood Emergency Response Plan has been provided to mitigate any adverse impacts. Refer to Table 1 in Item A updated Flood Impact Risk Assessment which provides a full response to this comment, prepared by GRC Hydro at Attachment N.
The newly adopted PRFS shows different levels and different hazard in some areas compared to the FIA. The PRFS, being calibrated, is expected to have higher flows than the FIA model. Further, the FIA does not appear to have modelled building blockages as the PRFS has per the below image. The PRFS has modelled Council's drainage network in full. The FIA states that a 700 mm pipe was modelled, which is inconsistent with the drainage system diagram shown in Figure 2 of the Stormwater SSD Report. There would be further differences between the models.	BCS	Following engagement with Council on 12th December 2024, the model adopted by GRC Hydro has been deemed the most appropriate to use to determine flood affectation and development impacts on site. The GRC Hydro model has been updated to include the local pits and pipes data provided by

<u>Recommendation:</u> The FIA is revised in line with the new PRFS and then the EIS should be revised accordingly. BCS recommends that the Council flood study model is used to revise the FIA due to the significant discrepancies between the two sets of results.		Council. A pipe proposed to connect the site with Vineyard Creek has been modelled as 100% blocked as a conservative approach. Refer to Table 1 in Item A within the updated Flood Impact Assessment which provides a full response to this comment, prepared by GRC Hydro at Attachment N.
Given the mapping of floodway and flood storage for the site, potential flood impact requires detailed consideration. BCS raises the following concerns regarding the flood impact assessment: • The civil drawings indicate a design surface has been prepared for below the building and show excavation of 0.15 – 0.5 m over a large area below the northern arm of the building. It appears the intent is to create an overland flow path beneath the building by regrading the existing surface to mitigate flood impacts. The FIA should be updated to explain the design here, including the principles and criteria. It should be noted that Parramatta City Council no longer permits flow paths beneath buildings due to poor urban design outcomes, the accumulation of rubbish, unsightly appearance, and difficulties with maintenance and vermin. The Parramatta Development Control Plan 2023 under Section 5.1.1 Flooding control C.15 states “In general, Council will not support proposals for flood flow-through or flood storage chambers within or beneath a new building, and alternate design solutions will be required.” BCS considers that the introduction of an underfloor void introduces considerable risks which would preferably be avoided through an alternate design. • With no details presented in the FIA, BCS raises concerns with the flow path design. The architectural drawings indicate locations with insufficient height available for water to pass beneath the building, which could lead to blockage. The proposed surface beneath the building has not been stated. Blockage, maintenance access, and obstruction by vegetation have not been considered. Figure 19 Concept Design Development Render of the EIS shows considerable vegetation in front of the entry to the flow path, which does not appear to have been included in the flood model. The flood figures, architectural, civil and landscaping drawings do not designate the overland flow path. • BCS is further concerned that the FIA has not modelled any obstructions for the proposed building. As a minimum, the entry points shown on architectural drawings need to be included in the model. • The FIA notes that an impact on flood levels to the east of the creek in the area immediately downstream of Victoria Road has been edited from the mapping. BCS requests that all mapping be provided without such editing, notwithstanding that the justification for the impact does not appear unreasonable. Recommendation: The FIA is updated to address the above flood impact assessment concerns.	BCS	The suspended slab has been revised to a slab on ground system with subfloor void filled in to avoid overland flow and flood water below the building.

The PRFS indicates that access to the site would be lost from at least a 20% AEP event, which is very frequent. For context, drainage for this development would be typically designed to convey the 5% AEP event. This frequency of inundation and isolation increases the risk of several adverse outcomes such as people driving or walking through floodwater and requiring rescue; coincident medical or other emergencies such as fire; and loss of services such as power and water. <u>Recommendation:</u> BCS recommends further consideration is given to improving the frequency with which access is lost.	BCS	Following engagement with Council on 12th December 2024, the Council agreed that the model adopted by GRC Hydro was the most appropriate to use to determine flood affectation and development impacts on site. The modelling indicates that in the 20% AEP event, inundation is less significant than that modelled by the Council. In the 1% AEP event, access to the site is flood free. Refer to the updated Flood Impact Risk Assessment which provides a full response to this comment, prepared by GRC Hydro at Attachment N.
The FIA should be updated to a Flood Impact and Risk Assessment (FIRA) in accordance with the NSW Flood Risk Management Manual 2023 and its supporting toolkit. In particular, the revised report should consider the provisions of Flood Risk Management Guidelines FB01 Understanding and managing flood risk, EM01 Support for Emergency Management Planning, and LU01 Flood Impact and Risk Assessment. In addition to the issues raised elsewhere in this advice, the following is required: • A new flood certificate based on the current flood study should be sought from Council. • Consideration of the flood function of the land. • Consideration of flood impacts for the full range of flood events. The building footprint and ground conditions require further detailed consideration to accurately determine the flood impact as explained above. The developed conditions figures should show relevant architectural details such as entries and other obstructions. • Consideration of flooding from the Parramatta River in extreme events. The PMF level in Parramatta River appears to be in the order of 9 m, which approximately corresponds to a 2% AEP event in Vineyard Creek at the site. This would also isolate the site. • Consideration of the time to onset of flooding and duration of isolation. This requires consideration of a range of storm durations and consideration of flooding from the Parramatta River. <u>Recommendation:</u> The FIA is updated to a Flood Impact and Risk Assessment (FIRA) in accordance with the NSW Flood Risk Management Manual 2023 and its supporting toolkit and address all matters raised in above comment.	BCS	The Flood Impact Assessment has been updated to reflect the various provisions detailed within Item C as a comprehensive response to submissions section provided at Attachment N. The flood certificate obtained was based on the Council's model, which has since been accepted as inaccurate in comparison to GRC Hydro's model for the site. This model considers the flood function and impacts of the land for the full range of flood events. GRC Hydro's flood modelling demonstrates that in a 20% AEP event, Vineyard Creek does not overtop. In a 1% AEP event, the time to overtop Victoria Road and the site itself becomes inundated after 1 hour and 15 minutes. In the PMF event, the site remains connected to land, and from level 1, all facilities are free of inundation. Refer to the updated Flood Impact Assessment prepared by GRC Hydro at Attachment N, for further details.
Flood Risk Management Guideline EM01 Support for Emergency Management Planning provides guidance on emergency management. The principles of the guideline should be	BCS	The Flood Emergency Response Plan within the Flood Impact Risk Assessment has been updated to include a decision-making process in

fully considered and responded to in a FIRA. Under Part D, Figure 21 presents a decision-making process for development that is compatible with existing zoning. <u>Recommendation:</u> Further investigation of the relevant elements of the flowchart in Figure 21 of the Flood Risk Management Guideline EM01 and as detailed elsewhere in this letter is required. This includes time of isolation, safety of occupants during isolation and residual risks.		accordance with the Flood Risk Management Guideline EM01. The Flood Impact Assessment has been updated to reflect the various provisions detailed within Item A and C as a comprehensive response to submissions section provided at Attachment N.
The FIA has recommended a shelter in place (SIP) strategy, due to the fast rate of rise of floodwater in the PMF. Where provisions are made to SIP, particular consideration must be given to isolation, secondary risks and human behaviour. Suitable utilities and provisions must be provided. The building itself would require sufficient space and amenities to cater to the itinerant population. These issues have not been duly considered in the FIA. SIP is not considered suitable in areas of high hazard flooding. The building is surrounded by high hazard flooding in a PMF event. Further, SIP is not considered suitable when the duration of isolation is not short. The duration of isolation has not been adequately addressed in the FIA because Parramatta River flooding was not considered. The duration of isolation should be suitably checked, including by modelling long duration PMF events. It is unreasonable to make conclusions on the duration of isolation solely based on the critical duration for flood levels. When long duration PMF events are considered, much longer durations of isolation can be identified. Utility services such as power and water may be unavailable at the same time as lack of access and egress due to flooding. Further detail around back up services may be needed for example generators and water storage, including their location (preferably above the PMF). <u>Recommendation:</u> The above comments in relation to the proposed shelter in place strategy need to be addressed.	BCS	A Shelter in Place strategy is considered to be the safest flood emergency response for flash flooding. Backup power and water supply will be provided in the Shelter in Place areas. The Flood Impact Assessment has been updated to reflect the various provisions detailed within Item A and C as a comprehensive response to submissions section provided at Attachment N.
BCS does not consider that private FERPs are a substitute for sound land use planning. Issues pertaining to flood emergency management should be co-ordinated with the SES and adequately resolved prior to planning approval to ensure that the development is compatible with the flood function and behaviour of the land. Guideline EM01 recommends that any emergency response strategy is consistent with SES local flood plans. Section A2.4 states that site-specific flood response plans are not considered by the SES to be an effective measure to strategically and effectively manage EM risks to the community during flooding. It is further stated that they are prone to failure, particularly where they do not consider important EM planning factors, do not have formalised and practised EM arrangements or access to important information. A FERP has been included as part of the FIA. BCS raises several issues with the FERP: The FERP refers to “back up power and water provision”, but no detail has been provided on these. Further, details of food storage have not been provided.	BCS	A site-specific Flood Emergency Response Plan has been provided within the Flood Impact Risk Assessment, which allows for the safe shelter through the following provisions: - Backup power and water supply will be included within the detailed design to support Shelter in Place. - Internal Shelter in Place areas to offer comfortable refuge. - Emergency supplies and food storage to be facilities in kitchen areas. - Incorporation of stairwells to allow for vertical evacuation.

• The FERP provides no details on the proposed shelter in place location, nor its capacity or suitability. • The FERP suggests that lifts may be used during a flood. The use of lifts should be avoided during a flood. The nominated emergency access point immediately south of the proposed building's southern entrance would not provide emergency access as the area is isolated from the 20% AEP flood. The FERP suggests that "staff should specifically look for warnings related to Parramatta River" on the Bureau of Meteorology (BoM) warnings page. However, BoM does not issue flood warnings for the Parramatta River. Nevertheless, flood watches are issued by BoM for the Parramatta River and may provide advance notice of flooding. It should be noted that flood watches issued by BoM are for large areas and that no indication of event magnitude (for example minor, moderate or major) is provided for the Parramatta River. A reference to severe weather warnings issued by BoM may also be beneficial for the FERP. The FERP notes that the flood warden should monitor water levels to trigger moving to higher elevations. BCS is concerned that reliance on this method may not lead to the outcome of safe relocation to SIP. The FIA (page 52) indicates that a very short time is available and has not demonstrated that the time available would be sufficient to initiate and execute relocation of occupants present on the ground floor and the floodplain surrounding the building <u>Recommendation:</u> The FERP is revised following reassessment of risk based on the current version of the PRFS and then referred to the SES for consideration.		The Flood Impact Assessment has been updated to reflect the various provisions detailed within Item A and C as a comprehensive response to submissions section provided at Attachment N.
The development is inconsistent with the flood provisions in Part 5.1.1 of Parramatta DCP 2023. In particular: • new development is only permitted where reliable access is available (Control C.07). It has not been demonstrated that the development is consistent with the Parramatta LGA Flood Emergency Sub Plan as required under the matrix control number 4 for evacuation. Excavation below the flood planning level is generally not permissible without a flood impact and risk assessment (FIRA); and • 'Educational establishments', listed under 'Sensitive Uses and Facilities' in Table 5.1.1.1 are not permitted on land subject to flooding in a PMF (Control C.16). 'Educational establishment' is defined the Parramatta LEP 2023 as a building or place used for education (including teaching) – b) tertiary institution, including a university or a TAFE establishment, that provides formal education and is constituted by or under an Act. <u>Recommendation:</u> Parramatta DCP 2023 flood provisions C.07 and C.16 should be addressed.	BCS	GRC Hydro have prepared an updated FIRA (Attachment N) which addresses the relevant and applicable State policies including the <i>Flood risk management manual</i> and related documents including <i>Flood Impact and Risk Assessment LU01</i>. Collectively, these policies and GRC Hydro's response appropriately deal with all flooding matters from a State-wide approach, which deals with flooding in greater detail than the Parramatta DCP provisions.
The proposed building nor the water feature should encroach into the riparian zone. Recommendation: Figure 40 of the FIA is updated to include the proposed conditions, and the landscape and civil drawings should include the riparian zone boundary in order to confirm the nature of proposed works within the riparian corridor.	BCS	An additional drawing has been prepared by Jackson Clements Burrows Architects to show that the boundary of the site does not encroach into the riparian zone boundary.

		Refer to Attachment F which provides additional drawing sheet demonstrating this response.
Note the study referred to throughout the Flood Risk Assessment as “Draft Parramatta River Flood Study” was adopted by Parramatta Council in June 2024 should be viewed as the most up to date flood information for the site.	NSW SES	As noted above, Council Officers have agreed that the GRC Hydro flood modelling is the most appropriate model to assess flooding at the site, which shows the magnitude of flooding to be less than that modelled in the Draft Parramatta River Flood Study. Refer to the updated Flood Impact Risk Assessment which provides an RTS In 'Item B' prepared by GRC Hydro at Attachment N , for further details.
Note the site is significantly flood affected becoming inundated as frequently as a 20% Annual Exceedance Probability (AEP) event ¹ and reaches depths in excess of 3 metres during a Probable Maximum Flood (PMF) event ² .	NSW SES	As noted above, Council Officers have agreed that the GRC Hydro flood modelling is the most appropriate model to assess flooding at the site, which shows the magnitude of flooding to be less than that modelled in the Draft Parramatta River Flood Study. Refer to the updated Flood Impact Assessment which provides a consolidated response to submissions by GRC Hydro at Attachment N .
Recommend seeking further information incorporating from the adopted Parramatta River Flood Study as well as time to overtopping of both the site and adjacent roads.	NSW SES	GRC Hydro's flood modelling in a 20% AEP event demonstrates that Vineyard Creek does not overtop. In a 1% AEP event, the time to overtop Victoria Road and the site itself becomes inundated after 1 hour and 15 minutes. Refer to the updated Flood Impact Assessment which provides a consolidated response to submissions by GRC Hydro at Attachment N .
Emphasise that NSW SES does not support shelter in place as a strategy for new development or the imposition of development consent conditions requiring private flood evacuation plans rather than the application of sound land use planning and flood risk management.	NSW SES	Shelter in Place is considered to be the most feasible emergency response particularly given the broader catchment is subject to flash flooding and evacuation will increase the risk of the occupants on site. This is particularly important for visitors who will not be aware of the safest and most efficient evacuation routes. Refer to the updated Flood Impact Assessment prepared by GRC Hydro at Attachment N for further details with regard to the recently adopted Shelter-in-Place Guideline for Flash Flooding.
Recommend closing the facility or sections that are at known risk of flooding or isolation prior to the onset of flooding and when there is an indication that flooding is likely.	NSW SES	When a flood event is likely, staff will instruct all occupants on the ground floor to ready

		themselves for vertical evacuation to level one and above, until the flooding subsides. Refer to the updated Flood Impact Assessment prepared by GRC Hydro at Attachment N, for further details.
Request that the emergency procedures contained in the Flood Emergency Response Plan are rewritten to reflect current NSW SES terminology and procedures. Please see Attachment A for further specific details. However, we reinforce that a FERP is not a failsafe way of managing an underlying flood risk.	NSW SES	The Preliminary Flood Emergency Response Plan has been updated in accordance with the NSW SES terminology and procedures, as requested. Refer to the updated Flood Impact Assessment prepared by GRC Hydro at Attachment N, for further details.
Recommend pursuing, if relevant, site design and stormwater management that reduces the impact of flooding and minimises any risk to the community. Any improvements that can be made to reduce flood risk will benefit the community.	NSW SES	The proposed design has reduced the impact of flooding, raised well above the 1% AEP flood level, which is deemed a significant improvement to the existing site. Refer to the updated Flood Impact Assessment prepared by GRC Hydro at Attachment N, for further details.
Recommend consideration of safety features for proposed lifts, to ensure that floodwater does not enter the lift, and ensure people do not exit into flooded areas.	NSW SES	A flood switch will be provided in the pit to park the lift car on a safe upper level. Stairways will be used for vertical evacuation. Refer to Attachment E for further comment from JCBA on the matter.
Any proposed Emergency Management strategy for an area should be compatible with the evacuation strategies identified in the relevant local or state flood plan or by the NSW SES. As per the NSW State Flood Plan and the Parramatta LGA Flood Emergency Sub Plan, evacuation is the primary emergency management strategy for people impacted by flooding.	NSW SES	Refer to the updated Flood Impact Risk Assessment prepared by GRC Hydro at Attachment N for further details to address agency concerns and the Department of Planning, Housing and Infrastructure recently issued Shelter-in-Place guidelines.
We request that the emergency procedures contained in the Flood Emergency Response Plan are rewritten to reflect current NSW SES terminology and procedures, and provide the following additional recommendations: - Recommend reducing the reliance on flood wardens and human behaviour to initiate emergency procedures. The FERP currently states “Flood wardens will observe the on-site flood markers at very regular intervals” and that emergency procedures will commence when markers reach 7.8 mAHD, however as the PMF rate of rise shows flooding reaches flood level in a matter of minutes this is not a reliable trigger. - Recommend references to “the 1% AEP design flood event” and other modelled storm events are removed from the emergency management plan and replaced with clear and actionable triggers which align with warnings issued by the Bureau of Meteorology and NSW SES, rather than AEP events. Warnings will not list the expected AEP extent as this is	NSW SES	Refer to the updated Flood Impact Risk Assessment prepared by GRC Hydro at Attachment N for further details to address agency concerns and the Department of Planning, Housing and Infrastructure recently issued Shelter-in-Place guidelines.

not known until after the peak of the flood event. Further, as the site is affected by flash flooding it is not subject to flood warnings. As such, Severe Weather Warnings and Thunderstorm Warnings will be the most likely form of advice about the potential for flood producing storms and rainfall. • Recommend 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. This is particularly challenging and likely to result in many “false alarms” as there are no formal warning systems for flooding at the site. However, the strategy of isolation or sheltering in buildings surrounded by flood water are not equivalent, in risk management terms, to evacuation. • Recommend careful consideration to the use of lifts in any vertical evacuation strategy. While the FERP states “Whilst stairways are the encouraged vertical evacuation route, elevators can continue to be used to vertically evacuate persons requiring assistance to the first level, during a PMF event flood water is modelled to reach 1.4 metres above floor level.		
The Parramatta River Flood Study adopted by Parramatta Council in June 2024 shows the site, in its current condition, as significantly more flood affected than stated in the Flood Impact Assessment. The Parramatta River Flood Study shows the site is entirely inundated as frequently as a 20% AEP event reaching hazard level 4 (H4). During a PMF event flooding exceeds 1.5 metres depth across the entire site and is mapped as H5 across the site. This level of hazard is unsafe for all people and vehicles with buildings requiring special engineering design and construction. The Flood Impact Assessment, however, states that during a 20% AEP event “Flood Depths: predominantly less than 0.1 m deep with a small portion up to 0.3 m. Flood Hazard: Max of H1 (low hazard)”. Further, figures 12 to 23 show significantly less flooding across the site than the adopted flood study showing the site as only partially inundated during a 20% AEP event and reaching only H3 under existing conditions. Further information should be sought, particularly with reference to the adopted 2024 Parramatta River Flood Study to accurately determine the flood risk on the site. NSW SES has previously responded to flooding incidents in the area of the university campus including road inundation. As the site and Victoria Road access are inundated during the 20% AEP flood, isolating the site, further modelling should be undertaken to demonstrate the time to overtopping of roads and the site itself.	NSW SES	Following engagement with Council, the model adopted by GRC Hydro has been deemed the most appropriate to use to determine flood affectation and development impacts on site. The modelling demonstrates that in a 20% AEP event, Vineyard Creek does not overtop and therefore, there are no impacts to Victoria Road. Refer to the updated Flood Impact Assessment which provides a consolidated response to submissions by GRC Hydro at Attachment N.
The ability of the existing community to effectively respond (including self-evacuating) within the available timeframe on available infrastructure is to be maintained. It is not to be impacted on by the cumulative impact of new development. Risk assessment should have regard to flood warning and evacuation demand on existing and	NSW SES	The proposed design of the Indigenous Centre of Excellence provides refuge areas above the PMF level, while the University campus has sufficient ground and enclosed shelter that lie outside the PMF extent.

future access/egress routes. Consideration should also be given to the impacts of localised flooding on evacuation routes. Evacuation must not require people to drive or walk through flood water. 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.		Refer to the updated Flood Impact Assessment which provides a consolidated response to submissions by GRC Hydro at Attachment N .
Managing flood risks associated with Low Flood Islands requires careful consideration of development type, likely users, and their ability respond to minimise their risks. This includes consideration of: - 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.\ - 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. - 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.	NSW SES	The site is located on the fringe of a high flood island with sufficient land and enclosed refuge areas situated both above the PMF level and outside of the PMF extent. Emergency vehicles can still access site in the event of an emergency, by entering and existing the site via Bridge Street overpass. Refer to the updated Flood Impact Assessment which provides a consolidated response to submissions by GRC Hydro at Attachment N.
Any Emergency Management strategy needs to consider people visiting the area or using a development.	NSW SES	The Flood Emergency Response Plan has been updated in the Flood Impact Risk Assessment prepared by GRC Hydro, which emphasises that Shelter in Place is the more appropriate emergency response particularly for visitors who will be unaware of potential evacuation routes. Refer to the updated Flood Impact Assessment which provides a consolidated response to submissions by GRC Hydro at Attachment N.
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 rate of rise of flood waters is relatively quick (only ~35 minutes for waters to rise above the finished floor level” during the PMF event, little to no warning time is likely to be available following the commencement of rainfall that would provide the community an opportunity to respond.	NSW SES	In the event of a flood, occupants on-site will be alerted and will be encouraged to vertically evacuate the ground floor level, to an elevated level that will exceed the PMF level in such an event. The building has been designed to withstand flooding, with emergency supplies and amenities provided in such a case. Refer to the updated Flood Impact Assessment which provides a consolidated response to submissions by GRC Hydro at Attachment N.
Development in a floodplain will increase the need for NSW SES to undertake continuous community awareness, preparedness, and response operations.	NSW SES	Owing to the proposed development being located within the University campus, with staff on-site every day, allows for efficient and effective

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. However, it is important to note that the NSW SES is opposed to the imposition of development consent conditions requiring private flood evacuation plans rather than the application of sound land use planning and flood risk management.		communication of training and evacuation preparedness. Refer to the updated Flood Impact Assessment which provides a consolidated response to submissions by GRC Hydro at Attachment N.
As per BCS' flood advice, the use of lifts should be avoided during a flood event. Clarify the alternative access available for evacuation to upper levels for occupants with restricted mobility during a flood event.	DPHI (via ToA)	Refer to the updated Flood Impact Assessment which provides a consolidated response to this item at Attachment N. As noted by GRC Hydro, the use of lifts will be avoided during a flood emergency, and in such an unlikely event where flood waters inundate the ground floor, stairwells are the vertical evacuation route and able-bodied people will assist those with restricted mobility.
Evidence from a certified engineer is required to confirm that the building can maintain structural integrity during a PMF event. Consideration must be given to the flood resilience of all building components. - Appendix N of the RtS report, which states that 'the primary structure has sufficient robustness to avoid disproportionate collapse during the PMF event,' does not adequately address the concerns. - Please confirm that the building structures will be designed to withstand the combined loads from occupants and staff, as well as any forces that may arise from flood water and debris during a PMF event, as per the finalised Shelter in Place Guideline for Flash Flooding. - If damage to any part of the building structures is anticipated, please discuss the potential risks to property, life, and the environment in the revised FERP, as well as recovery strategies from flooding that would minimise damage and disruption. Based on Chart 1: PMF Rate of Rise and Duration of Inundation in the revised Flood Emergency Response Plan (FERP), flood water reaches the ground finished floor level at 9m AHD within approximately 0.35 hours, which is about 21mins. Please clarify the statement in the plan indicating that it takes about 35mins for water to rise above the finished floor level.	DPHI (via ToA)	A letter has been prepared by TTW to confirm that the building can maintain structural integrity during a PMF event (Attachment S). TTW note that during a PMF event, the maximum water velocity will be 2.5m/s and will reach a point approximately 1.5m above the ground floor partially inundating the building for a period of approximately 1 hour. The force generated by the flood water on the ground floor is approximately 30% of the seismic loads the building has been designed for. As such, the building superstructure can resist the forced generated by the water flow while carrying the load of the building occupants sheltering on the upper floors. Any damaged portions of timber superstructure on the western portion of the building during the inundation period in the PMF event, will be treated or replaced as required. TTW do not consider that there would be any risk to life during the PMF event.
Discuss the local inundation and low points (Chart 3) on Fifth Street and Railway Street to determine the accurate duration of site isolation, considering that vehicles will access Fifth Street and Railway Street to exit the site after a flood event.	DPHI (via ToA)	The Railway Street low-point has been included at Chart 3 of the Flood Impact Risk Assessment at Attachment N. GRC Hydro note that the site can be evacuated via Bridge St to the north which connects to Victoria Road. The low point for this route is Victoria Road (8.1 m AHD), which is

		isolated for approximately 90 minutes during a PMF event.
Confirm whether the flood model accounts for the additional runoff resulting from the new hardstand surfaces within the reinstated P1 Car Park, which will be completed prior to the construction of the SSD development.	DPHI (via ToA)	Owing to the size and nature of the proposed at-grade car park, the response to submissions provided by GRC Hydro confirms that such provision will not have any impact on flood behaviour at the subject site. Refer to Attachment N for further discussions.
Include the safety measures for the proposed lifts listed in Appendix F of the RtS in the Flood Impact Risk Assessment.	DPHI (via ToA)	Refer to the update FIRA which provides a consolidated response to submissions detailing the safety measures of the proposed lifts (Attachment N) The Flood Emergency Response Plan as part of the Flood Impact Risk Assessment previously confirms that lifts are not to be used during emergencies and occupants with mobility issues should be assisted by able bodied occupants to the upper floor levels. Notwithstanding, the following safety measures will be implemented for the proposed lifts: • A flood switch to be provided in the pit to park the lift car on a safe upper level. • Full water proofing of the lift shaft. Refer to Attachment N for further discussions.
Stormwater management		
For the stormwater systems which will become Council's asset upon dedication, the following must be considered/provided: - A set of design drawings for existing or proposed stormwater system to be handed over to the council. A separate set of full civil drawings should also be included for reference. - The relocation of Council's existing pipe will require the new pipe to be designed to comply with the following requirements: 5% AEP with 50% blockage in sag pits and 20% blockage in on-grade pits and - safe overland flow in 1% AEP (with climate change and rainfall calibration). - An electronic copy of DRAINS model needs to be submitted along with the electronic copy of the sub-catchment plan and brief report to demonstrate adequacy and appropriateness of the drainage infrastructures. - Appropriate tail water conditions should be incorporated in the model. - Stormwater Drainage Plan and Longitudinal Section	City of Parramatta Council	The existing Council Stormwater pipe will be retained and protected with new maintenance pits either side for access of the footprint. Refer to the updated Civil Drawings included at Attachment K .

a. Stormwater Drainage Plan and longitudinal sections shall also include horizontal and vertical position of all existing and proposed service utilities. b. All Longitudinal drainage sections shall include the Hydraulic Grade Line for 5% AEP and 1% AEP (with Climate Change). c. All pipes need to be designed for heavy vehicular loading with consideration during construction and post-construction loading. Pipe class shall be no less than Class 3. All Pipes to be Reinforced Concrete Spigot and Socket Rubber Ring joint type. This information shall also be included in the longitudinal sections. vi. All stormwater drainage design details are to be in accordance with council standard drawings. All Pits shall be designed and constructed in accordance with council standard drawings. The design drawings shall include, but not limited to the following details; a. A detailed Pit Schedule with Pit ID, type and size of the pit, type and size of the pit cover, lintel size, reference to the drawing (such as council standard drawing number, custom pit etc) b. Any custom designed pits and council standard pits with depth greater than 2.5m shall include structural details and structural certifications referring drawing sheet details from registered structural engineer. c. All pit cover/ grate should be class D heavy duty, galvanised, bike safe and bolted down type. vii. Stormwater Drainage Design should consider proposed WSUD elements.		
Details on impacts on council's existing infrastructures including stormwater systems and required relocation/upgrades need to be included in the report in a separate section of the report.	City of Parramatta Council	The updated Stormwater SSD Report prepared by TTW (Attachment L) notes that the existing Council stormwater drain traversing the new building is to be retained and protected with maintenance pits installed upstream and downstream to provide access.
A clear maintenance plan needs to be included in design report to cover cleaning and maintenance of the stormwater and WSUD assets to be handed over to the council.	City of Parramatta Council	A Stormwater Maintenance Plan has been incorporated in the updated Stormwater SSD Report prepared by TTW (Attachment L). The Stormwater Maintenance Plan outlines the regular and long-term requirements for stormwater drainage through Water Sensitive Urban Design (WSUD) including: • Stormwater Drainage (Pits and Pipes) • Swale • Raingarden • Wetland The maintenance plan sets out the maintenance requirements to be undertaken monthly, quarterly, annually and as needed.

A map clearly showing proposed and existing public and private stormwater/flooding assets needs to be included. It should also show the owner (current/future) of the assets.	City of Parramatta Council	The existing stormwater drainage infrastructure is shown in the Civil Drawings identifies the ownerships of the assets (refer to Attachment K).
Council will not accept underfloor flow paths and buildings must be solid to the ground. Flow paths may contain Water Sensitive Design features, provided they are adequately designed for both low and high flow functions.	City of Parramatta Council	The suspended slab has been revised to a slab on ground system with subfloor void filled in to avoid overland flow and flood water below the building. Refer to Attachment L for further details.
The purpose of existing detention ponds on the site is to be reviewed and modelled and their benefit for flood mitigation recreated in the new proposal, or, if it is determined that these facilities do not benefit flooding, they may be replaced with other water sensitive design measures.	City of Parramatta Council	A revised landscape design has been provided and appropriately details the proposed flooding response by way of overland flow through the site. Refer to Attachment L .
Roof gardens are supported and encouraged as part of the development's integrated water management system.	City of Parramatta Council	The unique building form and design of the proposal has not made provision for the ability to accommodate roof gardens.
Council supports using water in the landscape to recreate ecologically valuable and relevant spaces and to manage rain and surface water.	City of Parramatta Council	Noted.
The net discharge of rainwater/stormwater from the site must be 10% less than that from the site in an undeveloped state (note this is not the predeveloped or existing state). This is for total discharge over time, not from temporary / peak discharges such as from an OSD system. This requirement is likely to require significant rainwater capture and use on the site.	City of Parramatta Council	The current use of the site is an at-grade car park. The proposed use for an education building with landscaped gardens with a developed OSD system results in far improved permeability and a net reduction in discharge from the site.
Discharged water quality must be as required in Council's DCP 2023 or better.	City of Parramatta Council	Noted. This is capable of being achieved.
Generally, the site water management system must be designed, built and operated in accordance with Parramatta DCP 2023 and also Council's 'Guidelines for Water Sensitive Design and the Blue Green City' which can be provided on request.	City of Parramatta Council	The site water management system has been designed in accordance with the requirements set out in the Parramatta DCP 2023. Refer to Attachment L for further details.
Insufficient information has been provided to confirm the potential groundwater inflow volumes. The applicant notes that there will be groundwater take due to excavations, but this is not quantified. This project has a potential for groundwater interception with deep foundation construction and services installation. The specific depths of trenches or piling foundations have not been provided. It is recommend that further information be provided to quantify groundwater take volumes. <u>Recommendation (pre-determination)</u> - That the proponent quantifies the maximum annual volume of groundwater take due to aquifer interference activities.	NSW Department of Climate Change, Energy, the Environment and Water	Refer to the Civil Engineers response Attachment M .

Under the Water Management Act 2000, if groundwater is intercepted a WAL must be obtained prior to any water take occurring unless an exemption under Clause 7 of Schedule 4 of the Water Management (General) Regulation 2018 applies. An exemption may be available if water take is less than or equal to 3 ML per water year, subject to the development meeting other exemption requirements, such as: - the water is not taken for consumption or supply; - the person claiming the exemption keeps a record of the water taken under the exemption and provides this to the Minister within 28 days of the end of the water year; and - the records are kept for 5 years. <u>Recommendation (pre-determination)</u> - The proponent should ensure a water access licence (WAL) is obtained to account for the maximum predicted water take for construction and operation activities unless an exemption applies under the Water Management (General) Regulation 2018.	NSW Department of Climate Change, Energy, the Environment and Water	As above.
Water Sensitive Urban Design		
The following is to be submitted to ensure that the proposed WSUD meets the requirements of section: - An overall water quality management plan needs to be submitted to council for review. - Electronic copy of MUSIC Model with the relevant background should be submitted to council for review. Rainfall Station should be PARRAMATTA NORTH MASONS DR (66124) 6 minutes data from 1988 to 1998 (10 years). It is also available in MUSIC-Link for MUSIC_X. - Except GPTs to the outlet, use of proprietary products as public WSUD elements are not recommended. - All WSUD and GPT devices are to be located to allow for safe access to maintain structures to meet with WHS requirements. - A brief report outlining background, modelling inputs and references, assumption, treatment approach, results, conclusion, and recommendations along with the electronic copy of the sub-catchment plans for WSUD elements should be included.	City of Parramatta Council	As above.
Heritage		
Due to the presence of existing concrete/hardstand surfaces, the ACHAR recommends that an Aboriginal archaeological test excavation program be implemented as soon as practicable "following SSD approval and prior to any ground disturbing works" and an indicative methodology and research design has been provided in Section 7.1.2 of the report. Heritage NSW provides the following comments in relation to the proposed test excavations and methodology:	Heritage NSW	Historical archaeological excavation has been recommended to include the monitored removal of concrete and excavation of above-natural soil features. A list of potential triggers for when salvage excavation is required has been included in the

• Please clarify what management measures, if any, will be in place during the initial removal of concrete / hardstand surfaces prior to undertaking test excavations, noting that the removal of existing surfaces has the potential to impact the ground surface. • Please update the proposed methodology to include specific triggers for when salvage excavation would be required. • Please update the proposed methodology to include consideration of the potential for conservation outcomes in the event that the test excavations identify deposits with high archaeological or cultural significance. • The ACHAR indicates that the study area is located within the curtilage of a State significant heritage item listed on the State Heritage Register (SHR # 00749) in addition to a number of other heritage listings which have variously been identified as having high research potential for State significant historical archaeological remains. Please update the proposed Aboriginal archaeological test excavation methodology to include consideration of interactions with any proposed historical archaeological investigations. This should include provisions to be enacted if historical heritage relics are identified during the Aboriginal archaeological investigation and vice versa, define when each methodology will be implemented, and outline the roles and responsibilities of staff on site in relation to Aboriginal and historical heritage.		updated ACHAR prepared by Curio Projects and provided at Attachment W, including: • High density of Aboriginal artefacts identified (5+ found per test pit) • The presence of significant tool types • Any other unusual or unique archaeological and/or geomorphological features identified by the Excavation Director • Multiple test pits in proximity to each other identify the presence of artefacts and have the potential to indicate a wider area of Aboriginal use and occupation. • Features such as a hearths or heat treated pits, burials, or other unexpected archaeological resources have been identified. The proposed methodology for the archaeological investigation has been updated, noting that most appropriate methodology is yet to be identified, but some examples of positive conservation outcomes include: • Full or partial in situ conservation below development level (dependent on the find i.e. burial). • Conservation of archaeological assemblages by qualified professionals and provided to the LALC for safekeeping. • Reburial of archaeological assemblages back into the ground once the Indigenous Centre of Excellence project has reached completion. The proposed Aboriginal archaeological test excavation methodology recommended that 2-3 sample test trenches should be undertaken prior to bulk excavation works in areas identified as having potential to contain relics of local or State significance. The methodology has also included potential interaction with Aboriginal archaeology, should this occur.
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		Refer to the RtS letter prepared by Curio Projects (prepared at the time of original RTS) at Attachment V .
The significance assessment presented in Section 5.1.1 of the ACHAR states that "The remnant melaleuca tree situated within the study area has been noted by the project RAPs are having high social and cultural significance, both as a connection to the past landscape and for its value as a source of bush medicine and resource." Considering that the melaleuca tree contributes to the cultural significance of the study area, please clarify whether it will be impacted by the proposed development and, if so, whether any management measures are required to off-set any impacts to these values.	Heritage NSW	The project team acknowledge the significance of the melaleuca tree and confirm that the tree will be retained and protected. The proposed development has been framed around the tree to draw focus to its significance. Refer to the RtS letter prepared by Curio Projects (prepared at the time of original RTS) at Attachment V .
Please confirm that the area of Potential Archaeological Deposit (PAD) identified during the ACHAR has been registered on the Aboriginal Heritage Information Management System (AHIMS) as required by Section 89A of the National Parks and Wildlife Act 1974 and update the ACHAR to include its AHIMS identifier.	Heritage NSW	Curio has registered the study area under AHIMS as 'WSU_Carpark_PAD' (AHIMS #45-6-4132). The ACHAR has been updated to include the AHIM identifier (refer to Attachment W for further information).
Heritage NSW notes that the Aboriginal Heritage Information Management System (AHIMS) search is greater than 12 months old at the time of submission. As per Requirement 1b of the Code of Practice, AHIMS searches must be contemporaneous with the project (less than 12 months). Please update the AHIMS search.	Heritage NSW	Section 4.5.2 of the ACHAR has been updated to include the AHIMS search within the 12-month validity timeframe, including 'WSU_Carpark_PAD' (AHIMS #45-6-4132). Refer to Attachment W for further details.
Recommendation 1. The location and detail of any proposed construction compounds or works areas outside of the development area should be approved prior to commencement of the works. Construction related activities including storage of materials, vehicular parking or vehicular access should be excluded from areas of high and moderate significance within the SHR curtilage.	Heritage NSW	The recommendation has been included within the updated Mitigation Measures at Attachment B .
Recommendation 2. Any ground disturbing works that are proposed outside of the development area should be assessed for potential archaeological impacts by a qualified archaeologist and approved prior to proceeding.	Heritage NSW	The recommendation has been included within the updated Mitigation Measures at Attachment B .
Recommendation 3. The remnant woodland paperbark Melaluca linarifolia near the centre of the development area should be protected from damage during construction in accordance with the recommendations included in the Arboricultural Impact Assessment & Tree Protection Plan.	Heritage NSW	The recommendation has been included within the updated Mitigation Measures at Attachment B . Notwithstanding, the design of the Indigenous Centre of Excellence has sought to retain the Melaluca linarifolia, as shown within the architectural drawings and the Arboricultural

		Impact Assessment and Tree Protection Plan submitted alongside the SSDA.
Recommendation 4. All project team members and construction personnel should undergo a heritage-specific induction to be made aware of the significance of the SHR listed site and to support the use of the unexpected finds protocol prior to undertaking any activities within the development area.	Heritage NSW	The recommendation has been included within the updated Mitigation Measures at Attachment B .
Recommendation 5. Provision for ease of maintenance and cleaning of the external cladding of the building should be considered as part of the design development.	Heritage NSW	The recommendation has been included within the updated Mitigation Measures at Attachment B .
Recommendation 6. The interpretation plan for the university campus should be updated to include the new development. The interpretation plan should consider the consultation with the Aboriginal community that was conducted as part of the design process.	Heritage NSW	The recommendation has been included within the updated Mitigation Measures at Attachment B .
Recommendation 7. Interpretation of any archaeological relics, if found, should be considered for inclusion in the design of the development. For Aboriginal archaeological resources and cultural materials, interpretation should be developed in consultation with the project's Registered Aboriginal Parties (RAPs) and local community members.	Heritage NSW	The recommendation has been included within the updated Mitigation Measures at Attachment B .
Recommendation 8. Before commencement of ground-disturbing works on site, the proponent should nominate a suitably qualified Excavation Director who complies with Criteria for Assessing Excavation Directors (Heritage Council of NSW 2019) to oversee and advise on matters associated with historical archaeology for the approval of the Secretary of the Department of Planning, Housing and Infrastructure in consultation with Heritage NSW. The Excavation Director should be present to oversee excavation, advise on archaeological issues and advise on the duration and extent of oversight required during archaeological excavations consistent with the approved Archaeological Research Design and Excavation Methodology.	Heritage NSW	Curio Projects have prepared a letter to support the nomination of a suitably qualified Secondary Excavation Director for archaeological management of potential State significant archaeological 'relics' associated with the site. Refer to Attachment Y for the full statement of nomination and accompanying Curriculum Vitae.
Recommendation 9. An Archaeological Research Design and Excavation Methodology (ARDEM) should be completed for the project in accordance with the guideline Archaeological Assessments (Heritage Office and DUAP 1996) to inform and guide archaeological investigation. The ARDEM is to: a) Identify the potential archaeological resource on site, and how it will be impacted by the proposed works. b) Identify research questions to guide the archaeological program. c) Justify the proposed approach to investigation. d) Propose a methodology for archaeological investigation on site, including test excavation, archaeological monitoring, and/or salvage excavation as appropriate. e) Outline triggers for the completion of salvage excavations as appropriate. f) Provide an Unexpected Finds Procedure for the proposed works. g) Consider the inclusion of an artefact discard policy and procedure.	Heritage NSW	An Archaeological Research Design and Excavation Methodology has been completed for the project by Curio Projects and is provided at Attachment X . The report appropriately addresses the criteria set out in the response provided by Heritage NSW.

h) Include clear triggers and hold points for the identification of substantially intact (and, if present, State significant) archaeological deposits/relics. If State significant archaeology is identified the hold points should require, and allow and allow for, consideration of redesign to avoid impacts. i) Provide a methodology for post-excavation analysis and reporting. j) Consider interactions with any proposed Aboriginal archaeological investigation. This should include provisions to be enacted if Aboriginal Objects are identified during historical archaeological investigation and vice versa, define when each methodology will be implemented, and outline the roles and responsibilities of staff on site in relation to Aboriginal heritage. The ARDEM should be provided to the Secretary of the Department of Planning, Housing and Infrastructure for approval in consultation with Heritage NSW.		
Infrastructure and Utilities		
The existing facility is supplied via high voltage customer substation no. 12555. As a high voltage customer the 'High Voltage Operational and Maintenance Protocol' between Endeavour Energy and the customer regarding the provision of high voltage supply to the site will specify a 'Load of Customers Installation' which is adequate for the then / Customer's current requirements. The Protocol generally also states the following: 'Should any further increase in loads be required, contact should be made with Endeavour Energy's Customer Network Solutions Branch, who will inform you of the requirements in this regard'. The Protocol also identifies where Endeavour Energy's responsibility terminates (normally at the pole or pillar on the road verge from which supply is taken) in respect of: • ownership of high voltage equipment; • switching operations; and • maintenance of equipment. All encroachments, activities and / or works (including subdivision and even if not part of the Development Application) whether temporary or permanent within or affecting an easement, restriction, right of access or protected works (other than those approved / certified by Endeavour Energy's Customer Network Solutions Branch as part of an enquiry / application for load or asset relocation project) need to be referred to Endeavour Energy's Easements Officers for assessment and possible approval if they meet the minimum safety requirements and controls. However please note that this does not constitute or imply the granting of approval by Endeavour Energy to any or all of the proposed encroachments and / or activities. For further information please refer to the attached copies of Endeavour Energy's: • General Restrictions for Underground Cables. • Mains Design Instruction MDI 0044 'Easements and Property Tenure Rights' which deals with activities / encroachments within easements. • The easement over the site does not appear to be addressed in the EIS.	Endeavour Energy	WSU will continue to work with utility providers and authorities to discuss campus wide energy needs to ensure appropriate supply.

To ensure an adequate connection, the applicant will need to engage an Accredited Service Provider (ASP) of an appropriate level and class of accreditation to assess the electricity load and the proposed method of supply for the development.	Endeavour Energy	The electrical services design for the Indigenous Centre of Excellence incorporates load shedding facility within the building to limit its load and remain within the campus capacity limit. Refer to the Response to Submissions letter prepared by Steensen Varming included at Attachment O .
An extension or augmentation of the existing electricity distribution network will be required. Whilst there are distribution substations in the area which are likely to have some spare capacity, it is not unlimited and will likely not be sufficient to provide for the additional load from the proposed development. Other factors such as the size and rating / load on the conductors and voltage drop (which can affect the quality of supply particularly with long conductor runs) etc. need to be assessed. However the extent of any works required will not be determined until the final load assessment is completed.	Endeavour Energy	It is acknowledged that the Indigenous Centre of Excellence will require the provision of a new pad mount substation and the existing University site high voltage network will be modified and extended to accommodate the facility. Refer to the Response to Submissions letter prepared by Steensen Varming included at Attachment O .
Endeavour Energy's network asset design policy is generally to progressively underground all new urban developments. All new cabling / reticulation infrastructure must be of an underground construction type. Where existing overhead construction is present on or in proximity of the site, it may require undergrounding as the development proceeds.	Endeavour Energy	It is acknowledged that any augmentation works to the Endeavour Energy network would be subject to the Endeavour Energy Connection Offer and ASP 3 approved design. Refer to the Response to Submissions letter prepared by Steensen Varming included at Attachment O .
The Electrical Utility Statement prepared by Steensen Varming dated 8 May 2024 is in keeping with the foregoing. The Architectural Drawings do not appear to show provision for the 'new pad mount substation'.	Endeavour Energy	The substation is now identified on drawing DA 1-102 revision 3, included at Attachment C .
The electricity distribution network relies in part on the retention of appropriate building setbacks to the road frontages to allow for line route / network design options and to provide safety clearances to conductors. Particular regard needs to be had to secondary road frontages or where overhead power lines are located near side or rear boundaries where lesser building setbacks apply. The higher the voltage, the greater the safety clearance required. This is also in keeping with a policy of prudent avoidance. The encroachment of building setbacks (including by roof structures or projections from external walls constructed with conductive materials) may transfer fault currents to the main building / dwelling. It can also result in construction works being required within the minimum safe approach distance and may require the application to Endeavour Energy for appropriate network outages eg. when erecting and dismantling scaffold, and may also be an issue for the ongoing maintenance of the building or structure. Endeavour Energy's recommendation is that whenever reasonably possible buildings and structures be located and designed to avoid the need to work within the safe approach distances for ordinary persons eg. not having parts of the building normally accessible to persons in close proximity of the overhead power lines; the use of durable / low maintenance	Endeavour Energy	The design of the scheme has considered the existing Endeavour Energy cabling, which is outside of the site boundary. The voltage of the aerial cabling is anticipated to be between 230V – 415V. As per AS/NZS 3000, the 9m easement still applies for cabling under 1000V. Refer to the Response to Submissions letter prepared by Steensen Varming included at Attachment O .

finishes. Alternatively, in some instances the adoption of an underground solution may be warranted ie. particularly for low voltage which can be more readily (in shorter distances) and comparatively economically be undergrounded. As a guide, Endeavour Energy's Mains Design Instruction MDI 0044 'Easements and Property Tenure Rights', Table 1 – 'Minimum easement widths', requires a minimum easement width of 9 metres for low voltage up to 22,000 volt / 22 kilovolt (kV) high voltage overhead power lines ie. 4.5 metres to both sides of the centreline of the poles / conductors. For higher voltages, the wider the required minimum easement width. The EIS indicates 'Boundary Setbacks Northern: 2.83m' being to the Victoria Road frontage where there are low voltage overhead power lines.		
The minimum required safety clearances and controls for buildings and structures (whether temporary or permanent) and working near overhead power lines must be maintained at all times. If there is any doubt whatsoever regarding the safety clearances to the overhead power lines, the applicant will need to have the safety clearances assessed by a suitably qualified electrical engineer / Accredited Service Provider (ASP). Even if there is no issue with the safety clearances to the building or structure, consideration must be given to WorkCover (now SafeWork NSW) 'Work Near Overhead Power Lines Code of Practice 2006' eg. ordinary persons must maintain a minimum safe approach distance of 3.0 metres to all voltages up to and including 132,000 volts / 132 kilovolt (kV). It also includes the following requirements for work near low voltage overhead power / service lines.	Endeavour Energy	The Contractor will prepare a work method statement to maintain work safety clearances as referenced. Refer to the Response to Submissions letter prepared by Steensen Varming included at Attachment O.

5.3 Procedural Matters

The Applicant's response to the submissions in relation to procedural matters are outlined in **Table 10** below.

Table 10 *Response to issues related to procedural matters*

Issue	Relevant submission/ stakeholder	Response
Land Ownership / Landowners consent		
Lot 101 DP816829 directly adjoins Lot 100 and is managed by the Department. If at any stage Lot 101 is required for the proposal or will be impacted in relation to operations associated with the proposal, a tenure may be required to authorise use of and/or access to the land. Native Title will need to be a considered prior to the grant of any tenure. Information regarding Native Title can be found at the below link: https://www.crownland.nsw.gov.au/protection-and-management/aboriginal-land-rights-and-native-title/native-title	NSW Government Crown Land	Under Section 69A of the <i>Crown Land Management Regulation 2018</i>, landowners consent from the Minister for Lands and Property is not required for the following: (a) a development application for State significant development, (b) a development application lodged by, or on behalf of, a public authority. (2) Subclause (1) extends to a development application lodged, but not determined, before the commencement of this clause. Following an approval, the Applicant will apply for a licence for part Lot 101 DP816829 to authorise any approved ground works. This approach was confirmed via email correspondence from Crown Lands to the Applicant which has been included at Attachment VV.
As per Crown Lands' advice, the proposed development footprint encompasses both Lot 100 and Lot 101 DP 816829, both identified as Crown Land. Works plans show works within both lots. Landowner's consent has not been provided for Lot 101 DP 816829 and must be provided prior to any determination in accordance with Section 23 of the Environmental Planning and Assessment Regulation 2021.	DPHI	Under Section 69A of the <i>Crown Land Management Regulation 2018</i>, landowners consent from the Minister for Lands and Property is not required for the following: (a) a development application for State significant development, (b) a development application lodged by, or on behalf of, a public authority. (2) Subclause (1) extends to a development application lodged, but not determined, before the commencement of this clause.

		Following an approval, the Applicant will apply for a licence for Lot 101 DP816829 to authorise any approved ground works.
As previously advised by Crown Lands, Lot 101 DP816829 is managed by the Department. Evidence must be submitted to confirm whether WSU is the Crown Land manager or the holder of a lease or licence over Lot 101. If not, please contact Crown Lands to obtain the landowner's consent and potentially enter a tenure to authorise use and access to Lot 101 as per Crown Lands' advice.	DPHI (via ToA)	WSU is the holder of a lease over Lot 101. Refer to Attachment VV , between WSU and Crown Lands, which confirms that the University will need to apply for a licence.
Aboriginal Community Consultation		
Please provide additional documentation of the consultation undertaken for the project comprising all correspondence sent and comments received. Please include Stage 1 notifications and registrations and evidence that the draft assessment methodology (Stage 2.3) and the draft ACHAR (stage 3) were provided to all 'registered Aboriginal parties' this additional documentation can comprise of copies of dated email records with all relevant email addresses shown and/or delivery/ read receipts of the correspondence.	Heritage NSW	Curio Projects have updated the ACHAR to include Stage 1 - Notification of Project Proposal and Registration of Interest, identifying the statutory bodies contacted and the 10 Registered Aboriginal Parties for the project. The Report provides copies of dated email records with all relevant email addresses shown. Refer to Attachment W for further information.
We note that Registered Aboriginal Parties provided comments during the site visit undertaken for the project including requests that male and female site officers be present during the test excavations and that a Welcome to Country and smoking ceremony as part of the test excavations. Please clarify how such comments have been considered and addressed in the ACHAR including the proposed test excavation methodology.	Heritage NSW	Curio Projects have updated the ACHAR to set out the proposed field methods and excavation methodology for site testing (refer to Section 7.1.2). Curio Projects have provided a commitment to organise a Welcome to Country and smoking ceremony prior to the start of excavation. Curio Projects have also noted they will ensure, to the best of their ability, that there are always both male and female RAP sit officers rostered for the excavation works. Refer to Attachment W for further details with regard to the excavation methodology.
Mitigation Measures		
Provide a revised Mitigation Measures Table that can be read as a stand-alone table that consolidates all commitments should the project be approved. All mitigation measures within all technical documents must be included within the table.	DPHI	An updated Consolidation Mitigation Measures document has been provided at Attachment B .
The Mitigation Measures Table must include all the recommendations in the technical reports, including but not limited to: Noise and Vibration Impact Assessment (NVIA) - summary of acoustic treatments, including building envelope treatments, management procedures, site specific and general mitigation	DPHI (via ToA)	An updated Consolidation Mitigation Measures document has been provided at Attachment B .

measures, complaints management system and contingency plan. (Note that Appendix C to the NVIA is incomplete). • Construction Traffic Management Plan - site communication and community notification. • Construction and Demolition Waste Management Plan. • Crime Prevention Through Environmental Design Assessment.		
Conditions of consent		
Recommended conditions before the Issue of a Construction Certificate: • Prior to issue of the relevant Construction Certificate, the P1 Replacement Car Park is to be operational and provide a minimum of 284 parking spaces as detailed in the Traffic Impact Assessment by Taylor Thomson and Whitting dated 26 July 2024." • The PCA shall ascertain that any new element in the carpark not illustrated on the approved plans such as columns, garage doors, fire safety measures and the like do not compromise appropriate manoeuvring and that compliance is maintained with AS 2890.1, AS2890.2 and AS 2890.6. Details are to be illustrated on plans submitted with the construction certificate application. • 28 bicycle spaces/racks are to be provided on-site and used accordingly for the Indigenous Centre of Excellence. The bicycle storage/racks are to comply with AS2890.3-2015. Details are to be illustrated on plans submitted with the construction certificate. Recommended conditions while building works is being carried out: • Occupation of any part of the footpath or road at or above (carrying out work, storage of building materials and the like) during construction of the development shall require a Road Occupancy Permit from Council. The applicant is to be required to submit an application for a Road Occupancy Permit through Council's Traffic and Transport Services, prior to carrying out the construction/restoration works. • Oversize vehicles using local roads require approval from the National Heavy Vehicle Regulator (NHVR). The applicant is to be required to submit an application for an Oversize Vehicle Access Permit through NHVR's portal (www.nhvr.gov.au/about-us/nhvr-portal), prior to driving through local roads within the City of Parramatta LGA.	City of Parramatta Council	As noted in Section 1.7 of the updated TAIA prepared by TTW in regard to traffic matters (Attachment P), the Applicant will accept the listed conditions.
Recommended condition - Prior to the issue of the relevant occupation certificate, the pedestrian link as required by DA/346/2022 is to be completed and made operational.	City of Parramatta Council	The existing approved DA has now lapsed and as such, this condition is not deemed necessary.
Recommended condition - Prior to the issue of an Occupation/Subdivision Certificate: Section 73 Compliance Certificate • A compliance certificate must be obtained from Sydney Water, under Section 73 of the Sydney Water Act 1994. Our assessment will determine the availability of water and wastewater services, which may require extensions, adjustments, or connections to our mains. Make an early application for the certificate, as there may be assets to be built and this can take some time. A Section 73 Compliance Certificate must be obtained before an Occupation or Subdivision Certificate will be issued.	Sydney Water	The Proponent agrees to this condition and an updated Consolidation Mitigation Measures document has been provided at Attachment B .

• Applications can be made either directly to Sydney Water or through a Sydney Water accredited Water Servicing Coordinator. • Go to the Sydney Water website or call 1300 082 746 to learn more about applying through an authorised WSC or Sydney Water.		
Recommended condition - Prior to the issue of a Construction Certificate/ Complying Development Certificate Building Plan Approval (including Tree planting guidelines) • The plans must be approved by Sydney Water prior to demolition, excavation or construction works commencing. This allows Sydney Water to determine if sewer, water or stormwater mains or easements will be affected by any part of your development. Any amendments to plans will require re-approval. Please go to Sydney Water Tap in® to apply. • Sydney Water recommends developers apply for a Building Plan Approval early as to reduce unnecessary delays to further referrals or development timescales.	Sydney Water	The Proponent agrees to this condition and an updated Consolidation Mitigation Measures document has been provided at Attachment B .
Recommended condition - Prior to the issue of a Construction Certificate/ Complying Development Certificate Tree Planting • Certain tree species placed in proximity to Sydney Water's underground assets have the potential to inflict damage through invasive root penetration and soil destabilisation. Section 46 of the Sydney Water Act specifies what might occur when there is interference or damage to our assets caused by trees. • For any trees proposed or planted that may cause destruction of, damage to or interference with our work and are in breach of the Sydney Water Act 1994, Sydney Water may issue an order to remove that tree or directly remove it and seek recovery for all loss and associated compensation for the removal. • For guidance on types of trees that can cause damage or interference with our assets see Sydney Water webpage Wastewater blockages. For guidance on how to plant trees near our assets, see Diagram 5 – Planting Trees within Sydney Water's Technical guidelines – Building over and adjacent to pipe assets.	Sydney Water	The Landscaping Planting Plan has been updated to comply with Sydney Water's guidelines. Refer to Attachment I for further details.
Please ensure that the 'before You Dig Australia' process is followed and if there is any change to the detail design that you communicate back to Ampol for review.	Ampol	Noted – able to comply.
Additional Documentation		
Combine civil drawing sheets into a single document that includes the full set.	DPHI (via ToA)	A combined civil drawings sheet has been provided at Attachment K .
Combine landscape drawing sheets into a single document that includes the full set and add scale bars to the landscape plans.	DPHI (via ToA)	Combined landscape drawing sheets have been provided at Attachment H (clean set) and Attachment I (clouded set).

Indicate the extent of the proposed projecting signage zone on the Roof Plan and West Elevation. Indicate the location of the business identification signage zone near the southern main entry on the Roof Plan.	DPHI (via ToA)	Refer to the proposed Roof Plan and West Elevation Plan prepared by JCBA and provided at Attachment C and D .
Provide an updated swept path analysis for the revised loading bay and vehicular turning area.	DPHI (via ToA)	A revised Swept Path Analysis for the revised loading bay and vehicular turning area has been provided in the Transport and Accessibility Impact Assessment prepared by TTW and provided at Attachment P .
Reference the intended materials, colours and finishes listed in the External Finishes Schedule on the architectural drawings.	DPHI (via ToA)	The external materials, colours and finishes have been identified in the updated architectural drawing package prepared by JCBA and provided at Attachment C and D .
Provide an updated construction timeframe for the project. The construction works were anticipated to commence in Q1 2025 and are scheduled to be completed and operational by 2026.	DPHI (via ToA)	Construction is now anticipated to commence Q4 2025 and scheduled to be completed and operational by late 2026.
Considering the changes made to the proposed development, provide an updated table of key project details (similar to Table 3 in the EIS report).	DPHI (via ToA)	A comparative table with the key project details has been prepared at Section 4.2 of this report.
Additionally, provide an addendum or the revision of the following: Design Report, with references to the revised drawing set.	DPHI (via ToA)	An updated Design Report has been prepared and is provided at Attachment G .
Additionally, provide an addendum or the revision of the following: BCA Assessment Report, with references to the revised drawing set.	DPHI (via ToA)	An updated BCA Assessment Report has been prepared and is provided at Attachment BB .
Additionally, provide an addendum or the revision of the following: Fire Safety Engineering Design Review, with references to the revised drawing set.	DPHI (via ToA)	A Performance Based Design Brief has been updated and prepared in accordance with the revised architectural plans and is provided at Attachment JJ .
Additionally, provide an addendum or the revision of the following: Accessibility Statement, with references to the revised drawing set.	DPHI (via ToA)	An updated Accessibility Report has been prepared and is provided at Attachment EE .
Additionally, provide an addendum or the revision of the following: Detailed Site Investigation, considering the change in excavation levels.	DPHI (via ToA)	An updated Detailed Site Investigation has been prepared to respond to RTS comments and is provided at Attachment FF .
Additionally, provide an addendum or the revision of the following: NVIA, considering the revised layout.	DPHI (via ToA)	An updated Noise and Vibration Impact Assessment has been prepared and is provided at Attachment DD .

5.4 Public Submissions

The Applicant's response to the public submissions received are outlined in **Table 11** below.

Table 11 Organisation Submissions

Issue	Relevant submission/ stakeholder	Response
Loss of parking		
I object to the removal of the university carpark without equivalent alternate parking arrangements put in place on the WSU campus. Street parking in Dundas, Rydalmere and Parramatta around the university is already scarce during the semester, with many students parking on residential streets and disregarding time limits. No parking signs and driveways. Access for residents become increasingly difficult, including for those who have paid for annual parking permits through Parramatta Council, during these times, and failure to maintain our improve on current levels of parking will only make this worse. This project needs to consider how parking and University access can be improved or maintained without creating further difficulty to residents.	Withheld name (Dundas, NSW)	The SSD has been revised to incorporate additional car parking areas which will supply 288 replacement car spaces and result in an overall net increase of 4 car parking spaces at the site. Response to Submissions has been prepared by TTW in regard to traffic considerations and is located within section 1.7 of Attachment P. It confirms the replacement car park is targeting completion prior to the commencement of construction of the Indigenous Centre of Excellence. As such, it is concluded that there is sufficient capacity within the car parks of the University.
Supportive overall, but concerned that no additional car park is being planned to support the new visitors to this new development. This new building would remove the largest car park on campus that currently provides ~30% of the current campus car space capacity, would be good to review the planned parking spaces, if a replacement car park of the same capacity would be sufficient. 1. Current parking does not seem sufficient as it often overflows onto Anderson/Rippon Ave. Which is fine, but drivers tend to park over half a day, despite the 30min/2-hours limit. 2. The Transport and Accessibility Impact Assessment estimates that the ICoE will increase the on-campus occupancy by 710 people for day events ~6 days a month (Table 17 of the Transport and Accessibility Impact Assessment). A replacement car park of equal capacity does not account for this additional occupancy levels introduced by this new ICoE. 3. The plan does not seem to plan for future increase in uni occupancy levels. Since the replacement car parks are to be built brand new, seems like a good opportunity to future-proof and plan for an increased	Withheld name (Dundas, NSW)	As above. Response to Submissions has been prepared by TTW in regard to traffic considerations and is located within section 1.7 of Attachment P. The new eastern and western car parks will either be completed prior to the demolition of the existing P1 car parks or timed to suit semester break times where parking demand is significantly reduced. Refer to the Parramatta South Temporary Carpark Strategy prepared by Western Sydney University Attachment T which outlines the car parking strategy and commitments

occupancy levels of the campus, and would help the surge in parking requirements for day/night events expected of the new ICoE		
Overall: Maybe worth having additional basement parking in the new ICoE, or increase the capacity of the two planned P1 Replacement Car Parks		

5.5 Additional Response to TOA Comments

Additional comments were received from DPHI (dated 16 July 2025) and Heritage NSW via DPHI (dated 28 July 2025). These comments are addressed in **Table 12** below.

Table 12 Additional Response to TOA Comments received from DPHI and Heritage NSW - July 2025

Comment		Response
Department of Planning, Housing and Infrastructure - 16 July 2025		
General comments	Confirm that the construction and operational job numbers generated by the proposed development are full-time equivalent numbers.	Confirmed as full time equivalent jobs as relevant throughout this report.
	In accordance with the Department's Submissions Policy, advice from government agencies is considered as Agency Advice, not submissions. The Key Issues prepared by the Department forms part of the consent authority's function under the EP&A Act and Regulation and are not submissions. Revise the RtS/AR to reflect the correct total of six submissions received (including those from Ampol, Sydney Water, Endeavour Energy, and Council), that were published on the project's website	Noted and amended. Refer to Section 2.0 of this Report.
	Specify the proposed staging of works in the RtS/AR (Stages 1 and 2), noting that the proposed carparks will be completed and operational prior to the demolition of the existing P1 carpark.	Refer to Section 4.4.10 of this Report.
	Provide a revised mitigation measures table, consolidating all recommendations from technical reports (e.g., Water Sensitive Urban Design (WSUD) report, Aboriginal Cultural Heritage Assessment Report (ACHAR)) not already incorporated into the project's physical layout and design. Alternatively, provide justification for any recommendations not adopted. All mitigation measures must use definitive language, replacing non-definitive language such as 'should' and 'may' and include references to the technical reports or other sources.	Refer to Attachment B which addresses this comment.
	Finalise the Biodiversity Development Assessment Report.	Refer to Attachment SS which addresses this comment.
	Remove editor's comments in the Temporary Carparking Strategy prepared by WSU.	Refer to Attachment T which addresses this comment.
	Update all references to 'projection signage' in the design report, architectural plans and other documents to 'signage zone'.	Refer to Attachment G which addresses this comment.
	Number all car parking spaces in the architectural plans.	

Comment		Response
Architectural Plans	Include the proposed materials and finishes for the western and eastern carpark, or a surface plan be provided in the landscaping set.	Refer to Attachments C and D which addresses this comment.
Landscape Plans	Update the landscape sections within the design report and the landscape plans to include the western and eastern carpark, including the existing and proposed planting plan, access and movement diagram, materials plan, canopy coverage, landscaped area, deep soil area and surface details of the amended project.	This has been addressed within the amended Design Report at Attachment G .
	Include detailing of the turf cell installation and any maintenance measures to ensure long-term turf health within the turf cell area.	Refer to Attachment AAA which provides Turf Cell Maintenance measures and installation strategy, prepared by TTW.
Visual Impact Assessment	Indicate a clear outline of the proposed built form on Figure 36 (view from the northwest of the site) in the Visual Impact Assessment.	Refer to new Figure 44 within Attachment NN which addresses this comment.
	The Department notes the absence of a visual assessment for the proposed carparks. It is strongly recommended to provide this assessment to outline the proposed extent of the car parking areas, illustrating the hardstand paved driveways and parked cars on a typical day within the heritage setting. This is essential to support the heritage impact assessment. Without this assessment, the RtS/AR does not address the concerns raised by Heritage NSW previously and is likely to result in further delays down the line.	Refer to Section 8.0 within Attachment NN which addresses this comment. Four (4) new viewpoints focussed on the proposed car parking areas have been provided and addressed in the revised VIA.
Flood Risk and Management	Revise Item B of the flood report to remove references to the REF.	This has been amended in the revised FIA provided at Attachment N .
	Update the flood maps in the main flood report to include the extent of the western and eastern carparks, reflecting pre and post development conditions and addressing flood risks holistically.	This has been amended in the revised FIA provided at Attachment N .
	Update the FERP to address suitable emergency procedures and measures for the carparks, particularly given the identified inundation risks in the western carpark (during 1% AEP, 0.2% AEP and PMF events with a hazard category of up to H4) and the eastern carpark and access road during PMF events.	Refer to Section 7.8 of the updated FIA provided at Attachment N where this has been addressed.
WSUD	Update the WSUD report to include the carparks and update the referenced documents to the most recent version.	Refer to Attachment U which addresses this comment.
Arboricultural Impact Assessment	Revise the AIA to state that it is supplementary to the original SSD AIA and will be read in conjunction with it. Update the referenced engineering plans in the AIA to the most recent version.	Refer to Attachment CC which addresses these comments.
Fire Safety	Update the referenced documents in the Fire Safety Engineering Design Review, Performance Based Design Brief and BCA Assessment Report to the most recent version.	Refer to: Attachment KK for the updated Fire Safety Engineering Design Review;

Comment		Response
		• Attachment JJ for the updated Performance Based Design Brief; and • Attachment BB for the updated BCA Assessment Report.
Contamination and Remediation	Remove references to the REF in the Contamination Report.	Refer to Attachment HH which provides a RAP that addresses contamination procedure.
	As per section 4.6 of the Resilience and Hazards SEPP, provide confirmation on whether the detected asbestos in the soil alter the conclusions of the Detailed Site Investigation of the original SSD, specifically regarding the site's suitability for the proposed use and whether a remedial action plan is required.	
Crown Lands Consent	The Department acknowledges that landowner's consent from the Minister for Lands and Property is no longer required under the Crown Land Management Act 2016 for SSD proponents. However, under section 23 of the EP&A Reg 2021, written consent from the landowner or evidence of notification to Crown Lands prior to lodgement is required. Provide either written consent from the Minister for Lands and Property or evidence that Crown Lands was notified of the SSD application before lodgement, satisfying section 23 of the EP&A Reg 2021.	This has previously been provided to DPHI under separate cover.
Heritage NSW - 28 July 2025		
Temporary status of east and west carparks	It is important that the temporary status of the proposed east and west carparks is clear and that there is a defined 'end date' for any approval and a requirement for the carparking to be removed and the landscape remediated. We request that further detail and justification for the length of time required for the temporary car parking be provided. As 5 years is a long timeframe for temporary impacts of this scale, we would propose 2 years as a suitable temporary period. The temporary period should be clearly defined in the Amendment Report.	The temporary car park is proposed to be in place for a period of 5 years. Refer to Attachment T for further information.
Justification for the number of parking spaces proposed	We note that the SSD will result in the loss of 284 parking spaces and the SSD amendment will provide 288 parking spaces across the proposed east and west carparks. A further 13 parking spaces will be provided on the existing P1 carpark site (assumed to be permanent?) Insufficient analysis or justification has been provided for the number of parking spaces that are proposed. We understand that some students are car dependant but also note that a light rail station has opened at the campus recently, making it easier to access the campus using public transport.	The additional parking demand associated with the ICoE will be absorbed into the on-campus parking. However, so that the impact to on-campus parking and the performance of the surrounding road network is minimised, the project is seeking a campus-wide shift away from private vehicle usage (resulting in net zero parking demand) so that any future traffic generated by the ICoE would be offset by overall reductions in private vehicle use at the WSU Parramatta campuses. In the medium to longer term, even further reductions in private vehicle usage are expected as the Parramatta Light Rail enters operation and sees further uptake of non-vehicle travel modes. Refer to Attachment P where the additional demand for parking is further elaborated on.

Comment	Response
Impacts on the character of the SHR item	Project civil engineer TTW, has confirmed at Appendix M that the most efficient layout the car park is as designed and other design consideration may have further tree impacts. The proposed layout achieves a balance between parking efficiency and impacts to heritage planting and landscaping. The minor visual impact of the proposed addition of the temporary parking is demonstrated at Appendix NN. The provision of 288 spaces appropriately caters for the combined traffic requirements of the campus with the new ICoE building added, in context of altered demand stemming from the introduction of the nearby Parramatta Light Rail services.
Further details required	Is the proposed detention tank permanent? Is there flexibility in its location? Why is it required – is it needed as a result of the temporary parking?
	Is the use of turf cell possible for the driveways as well as the parking spaces?
	Please provide detail of the proposed carpark lighting. It is noted that there will be 18 light poles across the east and west carparks, but we have not been able to find drawings showing the locations of these lightpoles.
	The historical archaeological assessment and archaeological research design have not considered proposed trenching for services (electrical and stormwater).
	Are there any new pedestrian paths proposed in the vicinity of the east and west carparks? Do the civil drawings represent the scope of works for the carparks?
	Visual impact assessment of the carparks, with cars included.
The proposed detention tank is required to attenuate post-development stormwater flows. It is located inground at the low point of the eastern car park within the footprint of works and is temporary, refer to Appendix M.	Refer to the civil response letter at Appendix M, which provides further explanation from the Turfcell manufacturer which does not recommend use of this product for high traffic areas.
The proposed lighting design has been included by TTW and is provided at Appendix BBB.	Revised reports by Curio, including the archaeological assessment (Appendix Z) and archaeological research design (Appendix AA) have considered the proposed trenching.
No new pedestrian paths have been proposed as AS2890.1 does not require internal pedestrian paths to be provided. The civil drawings represent the civil scope of works for the car parks, refer to Appendix K.	Cars have been included within the revised VIA provided at Appendix NN.

6.0 Further Assessment of Amended Project

The following section provides further environmental assessment undertaken in respect of the project, including as a result of the project amendments outlined in **Section 4.0** and the submissions discussed in **Section 5.0**.

6.1 Strategic and Statutory Context

Since SSDA lodgement, there have been no relevant changes to the strategic or statutory context that would affect the site or the proposed development. For completeness, the project's key statutory assessment is outlined in Appendix C of the EIS in the Statutory Compliance Table.

6.2 Built Form

Section 4.1 outlines the architectural changes made to the proposed development and the rationale behind them. Updated Architectural Drawings and a revised Design Report have been appended to this submission, illustrating the modifications.

The proposed changes represent refinements to the ICoE built form previously assessed and deemed acceptable in the publicly exhibited Environmental Impact Statement (EIS). Where internal floorplate layouts have been adjusted, the changes either maintain the outcomes of earlier assessments or result in reduced environmental impacts and improved functionality and user experience benefits.

A key revision involves changes to the ground floor design to prevent stormwater flow beneath the building. This modification eliminates potential overland flow or floodwater pooling beneath the structure. Consequently, surface water will now be directed along the site's eastern boundary, toward Vineyard Creek, and managed via various WSUD features to prevent adverse impacts. Further details on WSUD strategies WSUD initiatives and flooding mitigation measures are provided at **Section 6.4** and **6.5**.

Importantly, the building's external form, orientation, setbacks, and gross floor area (GFA) remain unchanged. A minor amendment is proposed to the rooftop multi-purpose court to incorporate a mechanical netting structure that will be extended during times of use, reaching an approximate height of RL 29.62 when fully extended.

Section 6.2.1 below addresses any potential visual impacts associated with this design change.

6.2.1 Visual Impacts

An updated Visual Impact Assessment (VIA), included in **Attachment NN**, has been prepared to address the proposed mechanical netting system for the rooftop multi-purpose court, as well as the heritage significance of the Campus precinct. The revised VIA includes additional photomontages and a written assessment evaluating whether the net enclosure maintains an appropriate visual relationship with surrounding sites.

Key conclusions from the updated VIA includes:

- The new net enclosure is not prominent when viewed from the north-west of the site (north side of Victoria Road). From this westbound vantage point, visibility is expected to be reduced when seen by people in vehicles, pedestrians and cyclists due to the building's height and the orientation of the elevation to which the multi-purpose court is located.
- Due to the constrained angle of view from this perspective, visibility of the site will be in large part blocked by the existing pedestrian bridge suspended above Victoria Road.
- The net enclosure does not cause any additional, significant or adverse visual impact and is not visible from the protected Elizabeth Farm viewpoint as identified in the *Parramatta Local Environmental Plan 2023*.
- The most visible location which the net enclosure is able to be viewed from is the WSU Campus Oval. However, from this vantage, it is noted that the view of the rooftop court is compatible with the prevailing sport and recreation character of this viewpoint and general location.
- The eastern and western car parks are located closer to the State heritage listed buildings but are not visually distinct features and will not significantly alter the existing landscape or setting of view corridors.

- The specification of the car park with the majority of finished surface areas within the car park areas as 'turfcell' finish with natural grass growing through, is considered to reasonably blend these parking areas within the existing turf landscape character of the heritage buildings.

Overall, the updated VIA concludes that the revised proposal maintains an appropriate built form relationship with its surrounding context. The VIA summarises that, while visible, the proposed car parks will have a low significance of visual impact on State heritage listed buildings, and on the WSU campus oval. Additionally, it concludes that the net enclosure does not alter the original findings or conclusions of the exhibited EIS.

6.3 Traffic and Parking

TTW has reviewed the feedback from DPHI, Heritage NSW, and other submissions, and has subsequently prepared updated versions of the Traffic Impact Assessment (TIA), Green Travel Plan (GTP), and Construction Traffic Management Plan (CTMP), provided in **Attachments P, Q and R**.

The revised TIA outlines the traffic and parking strategies for the proposed development during both the construction and operational phases. According to TTW, the new eastern and western replacement car parks will provide a combined total of 288 parking spaces—an increase of four spaces compared to the existing P1 car park. As a result, the removal of the P1 car park and construction of the new car parks will not reduce the overall campus parking capacity.

TTW reports that the total campus parking supply will increase from 1,109 to 1,126 spaces (a 1.5% increase), concluding that the resulting minor increase in traffic generation is negligible, acknowledging that the key factor influencing future traffic levels is the expected reduction in private car usage. This trend aligns with the University's evolving transport and access priorities, reflecting a shift away from private vehicle use in response to changing needs among staff and students.

TTW also concludes that the additional car parking will reduce demand and alleviates pressure on surrounding on-street parking. No further mitigation measures are recommended.

6.3.1 Car Park Construction Staging

As the proposed ICoE is to be constructed on the site of the existing P1 car park, its capacity will be fully reinstated through two new car parks (eastern and western), delivered in stages.

These replacement car parks will be completed **before** demolition of the P1 car park begins, ensuring **no reduction** in overall campus parking capacity and removing the need for interim parking arrangements.

6.3.2 Temporary Car Parking Strategy

Parramatta South Place Strategy

The new eastern and western car parks are proposed to be temporary and anticipated to be in place until a more permanent arrangement for car parking is developed. This arrangement is an interim solution to ensure that heritage impacts are minimised and a longer-term solution is found which prioritises the heritage and conservation values of the CMP.

As a long term solution, the *Parramatta South Place Strategy* is currently being prepared by Hill Thalix in collaboration with Sasaki, on behalf of Western Sydney University. This strategy will provide a comprehensive, high-level strategic framework for future planning and development of the Parramatta South Campus, aligning with the University long-term strategic goals. Further details underpinning the development of this Strategy is provided within the Parramatta South Temporary Carpark Strategy prepared by Western Sydney University and provided at **Appendix TT**.

The Strategy will adopt a principles-based approach to land-use planning, urban design, and transport, ensuring that the University's development objectives are met over the next decade. A critical component of the Parramatta South Place Strategy will be a comprehensive review of all transport options to and from the campus. This review will include both existing and evolving sustainable transport options to ensure that the campus is well-connected and accessible, while minimising reliance on private car use. As the campus grows, future transport solutions will be prioritized to enhance sustainability and reduce the environmental footprint of commuting. Further, previous masterplans completed for the campus have considered various options to consolidate parking on site and will be explored further the campus continues to evolve.

The Place Strategy will align with the University's future capital works program for the Parramatta South Campus. The strategy will be informed by updated Conservation Management Plans and Landscape Management Plans, ensuring that all proposed developments respect and preserve the heritage values of the site. These updated plans will ensure that heritage impacts are carefully managed and that development supports the ongoing preservation of significant cultural landscapes. The timeframe for the delivery and endorsement of the Parramatta South Place Strategy is Q1 2026.

Temporary P1 Car Park Approach

In response to the feedback during the public exhibition period, the Western Sydney University have investigated genuine replacement to the original loss of P1 car parking spaces in a temporary manner, to appropriately support the needs of the Campus, with the ICoE project in place. As detailed in Section 4.0, this replacement car park is proposed as part of the amended SSDA scope now sought.

During design development, a number of alternative locations were investigated and considered by Western Sydney University for the development of additional car parking spaces within the campus. This analysis aimed to balance the strategic need for more parking with maintaining the heritage and landscape values of the site.

The analysis of alternative options was guided by the following key considerations:

- Minimising impact on heritage and landscape character
- Proximity to the campus core
- Supporting campus events
- Easy access and connectivity
- Safety and security
- Accessibility for all users
- Travel time considerations
- Functional campus network

This culminated in a range of options considered which are highlighted below at **Figure 9**. Ultimately, Option 5 was considered to perform highest with regard to the key consideration listed above. Full details of each option and the appraisal process undertaken is provided in the Parramatta South Temporary Carpark Strategy prepared by Western Sydney University and provided at **Appendix TT**.



Figure 10 Options of potential P1 car park replacement locations

Source: Western Sydney University

Following a series of discussions with Heritage NSW, the Applicant has revised the proposal with the preferred option to ensure a more sensitive and respectful approach to the cultural landscape of the former Rydalmere Hospital Precinct. Further details of the revised proposal's sensitivity to the heritage significance of the site and an appraisal of the amended proposal's alignment with the landscape character described in the endorsed CMP is provided at **Section 6.6**.

6.4 Flooding

GRC Hydro has reviewed the feedback provided by DPHI, NSW SES, City of Parramatta, and other submissions, and has subsequently prepared a revised Flood Impact Risk Assessment (FIRA). This includes the car park flood assessment and a Response to Submissions (refer to **Attachment N**).

The updated FIRA assesses the new car parks described in Item B of the report, concluding that their construction will result in only minor alterations to the existing terrain. In particular, there is a total net cut of 950m³ to achieve the car park's proposed finished levels. Based on this, GRC Hydro finds that the new car parking works are unlikely to have any adverse impact on existing flood conditions at the site.

Notably, the assessment confirms that most of the car park works are located outside the 1% Annual Exceedance Probability (AEP) flood extent, with the eastern car park being entirely flood free and the western car park incorporating minor flood impacts that are isolated to the area to which stormwater drainage infrastructure is proposed. In the event of an emergency, access to the proposed works can be maintained via the existing road network on Fifth Street.

The updated FIRA also documents modelling for an updated on-slab design that replaces the previously proposed on-pier design, in response to submissions. This updated design remains consistent, and compliant with the flood-related controls and objectives of local planning instruments. Additionally, GRC has accepted agency guidance on the preference for evacuation and has amended the Flood Emergency Response Plan (FERP) to include additional safety provisions in a flood event.

6.4.1 Stormwater Management and Drainage

In addition, TTW has provided a revised Stormwater SSD Report (**Attachment L**), which includes an updated assessment of stormwater management for the amended proposal. Regarding the new ground floor levels for the ICOE building, TTW states that the slab-on-ground system with filled subfloor design avoids interference with overland flood flow and floodwater conveyance beneath the building. TTW confirms that the site levels have been carefully set to minimise net fill, preserve flood storage capacity, and avoid obstructing floodwater flow across the site or nearby watercourses. These revised levels have been verified by GRC Hydro in their updated assessment, which confirms no additional impact on existing flood conditions.

Regarding the stormwater flow implications of the new car park works, GRC Hydro concludes in the updated FIRA that the proposed car parks will not negatively affect water quality or site drainage. Additional stormwater infrastructure has been incorporated to mitigate overland flow during storm events, with discharge directed into the existing reticulated stormwater system. Specifically, water quality will be managed through the installation of an on-site detention tank in the eastern car park, which will regulate both water quality and quantity. In cases where the system exceeds capacity, overland flow has been designed to safely convey stormwater in accordance with Council's minimum 1% AEP flood requirements.

6.5 Landscape

The Landscape Plans (as amended) prepared by Jane Irwin Landscape Architecture (JILA) and Stormwater SSD Report (as amended) prepared by TTW are provided at **Attachments H** and **I** and **Attachment L** respectively. The updated landscape design and WSUD approach stem directly from the revised building design, mainly due to changes in the ground floor levels aimed at preventing water flow beneath the building.

These amendments have resulted in an increase to canopy cover from 34% to 44% through the revised landscape plan. However, the deep soil zone has slightly decreased from 6,147m² to 6,035m² due to adjustments in the WSUD strategy, which accommodate changes to the swale and wetland design. These changes ensure proper stormwater discharge management on the east side of the building as a result of the new ground floor levels.

Additionally, a new bio-detention raingarden is proposed near the loading bay to treat runoff from the building's west side and reduce stormwater conveyance pressures across the site during rainfall events.

6.5.1 Tree Removal

Three (3) additional trees are proposed for removal to make way for the new eastern and western car parks—specifically at the new kerb crossover for the western car park and to allow for new stormwater drainage infrastructure in the eastern car park.

A separate Arboricultural Impact Assessment has been prepared by Tree Survey (**Attachment CC**) which assessed 58 trees within the expanded project area and were categorised by their retention value:

- Low **retention priority**: 5 trees.
- Medium **retention priority**: 40 trees.
- High **retention priority**: 13 trees.

Of these, 55 trees will be retained, and 3 will be removed due to construction encroaching into more than 20% of their root zones:

- 2 trees at the southern edge of the western car park.
- 1 tree at the northern edge of the eastern car park.

Of the trees to be removed:

- 2 are of medium retention value.
- 1 is of low retention value.

Two of the trees also exhibit signs of minor canopy dieback and stunted growth and are not considered ecologically significant. Their removal is not expected to impact local biodiversity values. Further tree protection and mitigation measures are detailed in the updated Mitigation Measures (**Attachment B**).

6.5.2 Turf Cell Maintenance

A Turf Cell Maintenance Strategy has been prepared by TTW (**Attachment AAA**) which outlines maintenance procedures required in order to ensure long-term health and performance of the turf cells. TTW propose the following maintenance measures:

- Mowing as required (typically fortnightly).
- Fertiliser application (applied 2-3 times per year during spring, summer and autumn).
- Irrigation (as required).
- Topdressing (annually, or as required).
- Aeration as an optional measure only If signs of compaction or poor infiltration are observed.
- Visual inspection of turf surface to look for thinning turf, rutting or soil settlement on an occasional basis.
- Drainage performance check undertaken annually.
- Repairs to turf or cell structure as required, following inspection.

6.6 Heritage Impacts

6.6.1 Heritage post-European Settlement

An updated Heritage Impact Statement has been prepared by Curio and is provided at **Attachment Z**. The updated assessment takes into consideration the RFI matters raised by DPHI and Heritage NSW with respect to heritage impacts on the wider site, including a cumulative assessment of the revised proposal incorporating the temporary car parking elements. The HIS concludes as follows:

The proposed Indigenous Centre of Excellence (ICoE) will replace an existing car park with a state-of-the-art educational and cultural facility dedicated to advancing Indigenous knowledge, leadership, and reconciliation. The proposal reflects a sensitive and thoughtful approach to design, incorporating Indigenous-led architecture and native landscaping that is contextually responsive to both cultural and ecological heritage values. The building's scale, form, and material palette are sympathetic to its setting and clearly distinguishable from the adjacent heritage fabric.

The temporary car parks are located on open, previously disturbed land at the periphery of the heritage-listed campus. They have been sited and designed to avoid direct or indirect impacts on significant buildings, archaeological features, view corridors, or heritage landscapes. As temporary

interventions, the works are fully reversible and consistent with the conservation policies outlined in the site's Conservation Management Plan (CMP).

The revised HIS confirms that there will be no physical impacts on any significant heritage items within the vicinity, including the State Heritage Register-listed Rydalmere Hospital Precinct (former) (SHR No. 00749) and the locally listed "Wetlands" (Item I011). Visual impacts are considered neutral to positive, with the ICoE enhancing the aesthetic and cultural value of the site and the car parks having only minor, short-term effects.

Various recommendations including a photographic archival record, a Heritage Interpretation Plan and landscape and signage strategies are incorporated within the revised mitigation measures provided at **Appendix B**.

6.6.2 Aboriginal Heritage and Historical Archaeology

Updated Aboriginal Cultural Heritage Assessment Report (ACHAR) and Historical Archaeological Assessment (HAA) have been prepared by Curio and are provided at **Attachment W** and **AA**). The reports undertake a comprehensive archaeological assessment of the subject area and concludes that the site sits within an area which is known for having the potential to preserve archaeological features and that the site has been through varying degrees of disturbance, impacting its archaeological potential in some areas.

These assessments have taken into account the proposed trenching activities for the electrical scope of work to support the installation of car park lighting. Specifically, these trenching activities will be required at a depth range of between 0.5-1.5m in order to accommodate electrical infrastructure services for lighting, ticket machines and other wayfinding signs.

New stormwater drainage lines are also proposed in the eastern and southern sectors of the car parking areas and will run primarily in a north-south and east-west direction. These new drainage lines will link into Council existing stormwater systems. These trenches will be required at a depth range of 1-2m in order to accommodate stormwater infrastructure.

Various recommendations including archaeological testing, aboriginal cultural heritage site inductions, an Aboriginal Unexpected Finds Procedure and a Human Remains Procedure are incorporated within the revised mitigation measures provided at **Appendix B**.

6.7 Social Impact Assessment

The Social Impact Assessment (SIA) has been updated by GYDE following the completion of the public exhibition period and is provided at **Attachment XX**. The assessment includes updates to consider the cumulative impacts. The SIA specifically considered the impact of the proposed development in relation to traffic and parking and concludes that given that the replacement of car parking spaces to another area of the campus is positive for both nearby Campus residents and users of the Campus itself. This positive rating is also fuelled by the proposed staging of delivery works to ensure that the replacement car park is operational prior to the demolition of the P2 car park. Therefore, GYDE considers any perceived social impacts to be low in scale and largely positive.

6.8 Biodiversity

An updated Biodiversity Development Assessment Report (BDAR) prepared by Land Eco Consulting (**Attachment SS**) provides a consolidated ecological assessment of for the entire SSDA project area, including the new car parking works.

Key findings of this updated assessment include:

- The development will impact approximately 1.51 hectares of vegetation, primarily involving removal of non-indigenous native and exotic planted trees and exotic-dominated understorey vegetation.
- Most of the affected vegetation consists of high-threat exotic weeds or historically disturbed vegetation in poor condition, offering limited habitat value for threatened species.
- The report supports the use of the *Atlantis Turf Cell* system for the car park hardstand areas, allowing turf to be laid over topsoil. This approach helps to offset habitat loss by maintaining some ecological function on site.

6.9 Contamination and Remediation

A Car Park Geotechnical Investigation Report (**Attachment GG**) and Car Park Remediation Action Plan (RAP) (**Attachment HH**) and have both been prepared by Douglas Partners as separate assessments to the main ICOE building work. These reports specifically assess the geotechnical investigation of the new car parking areas and provides a comprehensive RAP that ensures the site's future suitability for the proposed car park works.

The Geotechnical investigations found that there is potentially evidence of asbestos containing material within the raised mound section to the north of the new western car park at the embankment area adjacent to the Bridge Street overpass, comprising up to 3m. Douglas Partners note that the found source of the asbestos was likely to be associated with previous imported fill, likely to derived from building demolition materials. Asbestos was also detected in the north western portion of the eastern car park.

As a preferred remediation strategy, Douglas Partners consider that the majority of fill found will require initial excavation, which provides the opportunity to further assess contamination levels found in the fill, and allow the fill to be placed into categories based on the recorded asbestos levels. A comprehensive RAP has been prepared by Douglas Partners to manage and remediate the contaminated material, and is provided at **Attachment HH**.

Importantly, all mitigation measures required to address contamination sources that may be present at the site are documented further in the Mitigation Measures (**Attachment B**) and are recommended so that risks remain low and acceptable.

6.10 Accessibility

An updated Accessibility Statement has been prepared by MGAC and is provided at **Attachment EE**. It concludes that an accessible car parking space directly associated with the ICoE building is continued to be provided in the revised design and therefore maintains its ability to meet relevant requirements for accessible parking including the Disability (Access to Premises – Buildings) Standards (2010), Building Code of Australia (BCA) (2022) Part D4, F4, E3 and other relevant Australian Standards.

6.11 Building Code of Australia

An updated Building Code of Australia (BCA) Compliance Statement has been prepared by BM+G and is provided at **Attachment BB**. The statement confirms that the revised proposal continues to be able to readily achieve compliance with the BCA.

Where performance based solutions are proposed in order to meet the requirements of the BCA as identified by BM+G, a revised Performance Based Design Brief (PBDB) has been prepared by Scientific Fire Services (SFS) and is provided at **Attachment JJ**. SFS provide performance solutions to achieve compliance with the performance requirements of the BCA.

6.12 Other Environmental Impacts

Table 13 summarises how the project amendments described in **Section 4.0** relate to the prior assessment of environmental impacts outlined in the EIS. **Table 13** should be read in conjunction with further assessment and clarifications provided in the response to submissions set out in **Section 5.0** of this report.

Table 13 Other Impacts

EIS Assessment Matter	Comment
Built Form and Urban Design	Refer to Section 6.2 and updated Design Report provided at Attachment G .
Landscaping	Refer to Section 6.5 and updated Landscape Plans provided Attachments H and I .
Transport, Traffic, Parking and Access	Refer to Section 6.3 and updated report providing consolidated of traffic and parking impacts at Attachment P .
Heritage and Archaeology	Refer to Section 6.6 and Attachments V, W, X, Y and Z .
Flooding	Refer to Section 6.4 and updated Flood Impact Risk Assessment provided at Attachment N which demonstrates flood impacts to the main building works at 'Item A', specific flood impacts to the new car parking areas at 'Item B' and a response to the submissions received at 'Item C'.

EIS Assessment Matter	Comment
Tree Removal	Refer to Section 6.5.1 and Attachment CC which provides specific updated Arboricultural Impact Assessment relative to the new car parking works.
Noise and Vibration	No change from previous assessment. An updated report with new project description is provided at Attachment DD .
Pedestrian Wind	No change from previous assessment. An updated report with new project description is provided at Attachment RR .
Sustainability	No change from previous assessment. An updated report with new project description is provided at Attachment TT .
Contamination and Remediation	Refer to Section 6.9 and additional assessment reports provided by Douglas Partners at Attachments GG and HH which specifically focuses on contamination and geotechnical assessment of the car parking areas.
Biodiversity	Refer to Section 6.8 and updated report providing consolidated assessment of biodiversity impacts provided at Attachment SS .
Waste Management	No change from previous assessment. An updated report with new project description is provided at Attachments ZZ and ZZ .
CPTED	No change from previous assessment. An updated report with new project description is provided at Attachment PP .
Construction Traffic Management	No change from previous assessment. Refer to updated Attachment R which includes revised swept path drawings to respond to the appropriate submission received.
Accessibility	No change from previous assessment. An updated report with new project description is provided at Attachment EE .
Building Code of Australia / Fire Safety Engineering	Refer to Section 6.11 and updated BCA Report provided at Attachment BB and the revised Performance Based Design Brief at Attachment JJ .
Social Impacts	Refer to Section 6.7 and Attachment XX .
Contributions	No change from previous assessment.

7.0 Updated Project Justification

This section provides an updated justification and evaluation of the project as a whole, incorporating any relevant issues raised in submissions and the Applicant's response to these issues. Any design changes or assessments undertaken are in response to issues raised in submissions or further design development and have not increased the impact of the development. The design changes are minor in nature. As such, the justification for the project as previously outlined in the EIS is reiterated and strengthened through the presented responses which comprise meaningful amendments to the Proposal.

7.1 Ecologically Sustainable Development

The EP&A Regulation lists four principles of ecologically sustainable development to be considered in assessing a project. They are:

- The precautionary principle.
- Intergenerational equity.
- Conservation of biological diversity and ecological integrity.
- Improved valuation and pricing of environmental resources.

An analysis of these principles follows.

7.1.1 Precautionary Principal

The precautionary principle is utilised when uncertainty exists about potential environmental impacts. It provides that if there are threats of serious or irreversible environmental damage, lack of full scientific certainty should not be used as a reason for postponing measures to prevent environmental degradation. The precautionary principle requires careful evaluation of potential environmental impacts in order to avoid, wherever practicable, serious or irreversible damage to the environment.

This Submissions and Amendment Report has not identified any serious threat of irreversible damage to the environment and therefore precautionary principle is not relevant to the project. The updated Ecology Statement demonstrates that no threatened species or ecological communities were observed in the car park components of the site. Therefore, there are no anticipated significant impacts on threatened species or threatened ecological communities and the threat of serious irreversible environmental damage.

Further, the proposal (as amended) will continue to deliver a high standard of ESD outcomes and initiatives at the site, as described above, and will minimise environmental impacts in areas of energy, water and materials efficiency. Proactive measures to prevent environmental degradation have been included within the design, construction, and operational phases of the new ICoE and its landscape. The contractor will implement environmental management plans during the construction phase and operational procedures of the development will actively pursue relevant targets to meet the relevant mitigation measures and mitigate or minimise potential environmental risks.

7.1.2 Intergenerational Equity

Inter-generational equity is concerned with ensuring that the health, diversity and productivity of the environment are maintained or enhanced for the benefit of future generations. The project (as amended) has been designed to benefit both the existing and future generations by:

- Implementing safeguards and management measures to protect environmental values.
- Providing a high level of sustainability and demonstrates responsibility in utilising passive design strategies that minimise the buildings environmental impact.
- Delivering new learning spaces for creative, research and knowledge-sharing programs that are Indigenous focused. This has the potential to improve life-long education outcomes for students to strengthen their Indigenous self determination.
- Nurturing the relationship between Indigenous communities and Western Sydney University to celebrate and showcase Indigenous culture, by providing dedicated educational, research and cultural facilities.
- Facilitating job creation and more widely supports the continuation of investment in tertiary educational facilities and supporting future enrolment capacity.

The project (as amended) has integrated short and long-term social, financial and environmental considerations so that any foreseeable impacts are not left to be addressed by future generations. Issues with potential long-term implications such as waste disposal would be avoided and/or minimised through construction planning and the application of safeguards and management measures.

7.1.3 Conservation of Biological Diversity and Ecological Integrity

The principle of biological diversity upholds that the conservation of biological diversity and ecological integrity should be a fundamental consideration. The proposal would not have any significant effect on the biological diversity and ecological integrity of the study area. As demonstrated in the original EIS, at **Section 6.0** and throughout this Report, the proposed development (including car park) will not result in any significant effect on the biological and ecological integrity of the study area, subject to the mitigation measures set out in **Attachment B**.

7.1.4 Improved Valuation, Pricing and Incentive Mechanisms

The principles of improved valuation and pricing of environmental resources requires consideration of all environmental resources which may be affected by a proposal, including air, water, land and living things. The cost of infrastructure, design measures, and other sustainability initiatives associated with the project (as amended) have been incorporated into the cost of the development and will be delivered in the most cost-effective way via a life cycle cost approach that provides best return on investment.

Energy-efficient design and using renewable energy sources reduce the building's operational costs and environmental impacts over its lifetime are at the core of the project's design ethos and proven through its Country-centric design approach. Overall, the project (as amended) addresses the principles of ecologically sustainable development through its commitment to energy efficiency, renewable energy, passive design strategies, avoidance of fossil fuels and toxic materials and pursuit of a high sustainability rating and respect for the land.

7.2 Likely Impacts of Development

Having regard to the natural environment, built environment and economic and social impacts of the proposed development, the likely impacts of the development (as amended) are considered acceptable as outlined in the following sections.

7.2.1 Natural and Built Environment

The proposed development (as amended) has demonstrated that the proposal adopts appropriate management strategies and will generate limited environmental impacts, due to the proposed mitigation measures and the design of the development.

All potential environmental impacts are thoroughly addressed in the EIS and Section 6.0 of this Submissions and Amendment Report.

7.2.2 Social and Economic

An assessment of the likely social impacts of the project have been undertaken in the updated Social Impact Assessment at **Attachment XX**, prepared in accordance with DPHI's *Social Impact Assessment Guideline 2023*. The assessment confirms that the proposal has the potential to result in both positive and negative impacts. The identified negative impacts are primarily short-term related to completing construction activities on the site and have informed mitigation measures at **Attachment B**. The identified positive impacts range from short-term to long-term and will impact new students, First Nations communities and the wider University via improved tertiary education offerings and a commitment to Indigenous learning and self-determination.

In addition, the ongoing construction phase of the project will support approximately 340 construction jobs and approximately 150 ongoing jobs in operation (full time equivalent). Overall, the SSD will ensure positive social outcomes for the broader WSU community subject to the implementation of the amended mitigation measures at **Attachment B**. Investment in WSU's academic offering and creating a place that is comfortable for Elders to be in and navigate Indigenous learning, teaching and cultural expression will provide widespread, significant and long-term benefits.

7.3 Suitability of the Site

Having regard to the characteristics of the Site and its location, the proposed development (as refined and amended) remains suitable for the site in that:

- The site is zoned SP2 under the Parramatta LEP as educational establishment, which seeks to protect and enhance existing educational facilities, and the project will meet the objectives for this land use zone.
- It will support future development within the Campus, including mitigating any potential traffic generation impacts.
- The site is of sufficient size to accommodate new built form, car parking and open space areas.
- The site is located within the heart of Parramatta and therefore is ideally positioned to host a 'destination' development that contributes to the local and wider community.

7.4 Public Interest

The proposed development remains in the public interest as it:

- Will deliver significant social, cultural and economic benefits to the local and greater Sydney and NSW community by providing new educational and cultural infrastructure that will support learning programs and research, providing enhanced opportunities for collaboration between Western Sydney University, community, and Indigenous stakeholders. This has the potential to improve life-long education outcomes for students and thereby supporting long term social and economic wellbeing;
- Supports and aligns with the broader strategic opportunity to provide enhanced high-quality tertiary educational facilities;
- Represents the economic and orderly development of land that will retain the existing core function of the campus and renew and enhance the existing facilities;
- Provide an additional approximate 490 jobs in both the construction and operational stages of development;
- Was the subject of a voluntary design excellence competition process which ensured a high-quality built form and landscape design that achieves design excellence and contributes to the architecture of the wider Western Sydney University Parramatta South Campus and Greater Sydney;
- Provides opportunities to better integrate with its surrounds including enhanced connections to the nearby light rail stop, to support the activation and uses of these spaces and destinations;
- Identifies the desire to achieve a high level of environmental performance including achieving a targeted 6 Star Green Star Rating, as well as measures that promote and support the uptake of sustainable transport options, and design considerations for addressing environmental risks and climate change; and
- Will not result in any significant environmental impacts that cannot be appropriately mitigated or managed through adherence to the mitigation measures outlined in the supporting technical documentation.

8.0 Conclusion

As set out in this Submissions and Amendment Report, the Applicant has reviewed each of the submissions made by members of the general public and State and local Government agencies. In response to issues raised in these submissions, as well as matters identified by the Department, the Applicant has undertaken further environmental assessment to provide clarifications.

A number of minor changes to the proposed development have been made in the course of responding to matters raised in the submissions, as well as a result of further project design development. This Submissions and Amendment Report has set out these matters as required under section 59(2) and 37(6) of the *Environmental Planning and Assessment Regulation 2021* (EP&A Regulation) and in accordance with the DPHI's *State Significant Development Guidelines*, including *Appendix C – Preparing a Submissions Report* and *Appendix D - Preparing and Amendment Report*.

As discussed in detail in this report, the proposed works will not result in any significant or long-term impact. The potential impacts identified can be reasonably mitigated and where necessary managed through the adoption of suitable site practices and adherence to accepted industry standards.

Therefore, the revised SSD can be justified on the following grounds:

- It is consistent and complies with all relevant legislation, plans and policies;
- It provides for the ongoing supply of off-street car parking for the Parramatta South Campus which mitigates traffic and car parking capacity for the Campus community In line with the Proposal;
- It will support future development within the Campus, including mitigating any potential traffic generation impacts;
- It will support biodiversity and landscape impacts via the Innovative solution to propose turf cell groundcover design which allows for a permeable solution to the car park hardstand area;
- The revised proposal is supported from a visual impact assessment perspective and has been assessed against the relevant principles of tenacity;
- Other supporting technical studies which accompany this Submissions and Amendment Report confirms that the environmental impacts associate with the proposal are minimal and temporary in nature and therefore will not give rise to any adverse long-lasting impacts; and
- The revised SSD remains to be suitable for the site and is in the public interest

The Indigenous Centre of Excellence will be an important asset for both Western Sydney University and local community alike, providing a space for the commitment to advancing Indigenous education, leadership, and reconciliation. The Indigenous Centre of Excellence will stand as a symbol of recognition of Indigenous land and the Western Sydney University's relationship with Indigenous communities. The Indigenous Centre of Excellence will represent a celebration of tens of thousands of years of Indigenous knowledges and histories, a legacy that Western Sydney University is honoured to nurture and promote through further education opportunities for students and communities.

The environmental assessment concludes that, subject to the implementation of final mitigation measures outlined in **Attachment B**, the proposed development would not result in any unacceptable impacts and will generate a number of significant social, educational and economic benefits for Western Sydney and NSW. Accordingly, the Department is requested to complete its assessment of the project and recommend the project be approved by the Minister for Planning and Public Spaces.