Your Reference: SSD 16_7942
Our Reference: NCA/4/2017
Contact: Myfanwy McNally
Telephone: 9806 5447

8 September 2017

Andrew Hartcher
Department of Planning and Environment
22-23 Bridge Street Sydney
NSW 2000

Dear Mr. Hartcher,

Re: URBN SURF - Open Water Surf Sports Lagoon Facility, Pod B, Part of P5 Carpark, Sydney Olympic Park NSW 2127

Thank you for the opportunity to comment on the proposal currently on exhibition.

The proposal is consistent with the objectives of the Sydney Olympic Park Authority (SOPA) to enhance the Park's status as the home for major sporting events entertainment and recreational activities. It is also broadly consistent with Council's draft Social Infrastructure Strategy in that the proposal would provide regional recreational benefits, adding diversity and a strong point of difference from other offerings currently available within the LGA and Greater Western Sydney.

Furthermore, the City of Parramatta Council welcomes the opportunities that the Open water surf sports lagoon presents and would like to provide the following comments and concerns. Key staff are happy to meet with the applicants should it be helpful.

The comments are broken down into two main sections, first being the executive summary that is then followed by Attachment A which provides a detailed outline of previously identified issues.

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Executive Summary

1.1 Design of the Public Plaza Entry and Car Park Facilities

Permeable pavement is recommended as the ground cover treatment in the entry plaza and the design should exhibit a higher level of integration with the public domain and public bus access.

Car park facilities need to incorporate clearly defined pedestrian access paths, directional signage and balanced lighting to offer pedestrian safety whilst minimising light spill on the surrounding natural environment as per AS4282: 1997 (Control of Obtrusive Effects of Outdoor Lighting).

Staff parking is to be provided within the general car park, rather than having the additional small 7 space car park at the service entrance. As the use of the busway to access these 7 parking spaces could conflict with the future Light Rail initiative.

Given the regional scale of the facility many patrons are still expected to use cars and the parking availability offered may be insufficient in this context.

1.2 Landscaping and Biodiversity Conservation

The shade offered by tree planting is insufficient in the zone 1 car park, the eastern boundary lagoon deck area, the children's play area and the activity nodes used for layout and seating of patrons on the site.

Screen planting is encouraged on the site boundary to cover the unsightliness of the proposed plant room and southern public carpark.

Consideration should also be made for the retention of existing mature trees and vegetation to the perimeter boundaries of the site, supplemented with additional planting. This is in accordance with the Flora and Fauna Assessment to provide screening and scale to the built form whilst strengthening locally endemic plant communities namely the Sydney Turpentine Ironbark Rainforest. The identified buffer zones include the 10m eastern and 20m northern boundaries.

A recommendation is made to engage an AQF Level 5 Consulting Arborist to provide advice as to suitable locations for large tree replanting and an Existing Tree Management Plan outlining tree protection measures in accordance with AS4970-2009 (Protection of Trees on Development Sites). The consultant is to supervise the retention of trees in a site management capacity during demolition and construction.

An experienced ecologist is to be engaged to undertake pre-removal inspections and relocation of reptiles and other native fauna prior to and during decommissioning of gabion drainage swales. This advice should be incorporated into the formal preparation and implementation of a Flora and Fauna Management Plan as part of the Construction Environmental Management Plan to minimise and manage the impact on species, including but not limited to:

a. Fauna inspection and relocation prior to and during drainage swale removal;

b. Green and Golden Bell Frog monitoring and management, etc.

1.3 Environmental Outcomes

Design features are encouraged to reduce water evaporation, attain a Green Star Rating and comply with NCC Section J energy use standards Further support documentation is recommended in the inclusion of a Climate Change Adaptation Plan and an alternative reuse strategy in the case of the facility potentially becoming economically unviable. For the detailed response in relation to this section please refer to attachment A Section 2.1 below.

1.4 Traffic Impacts

The statement of environmental effects, on page 35, indicates that the Sydney Olympic Park railway station is approximately 1 kilometre away from the site. This is well beyond acceptable walking distances, which then identifies alternative methods of transportation as being far more viable. Therefore, it is pivotal that the development will integrate well with future light rail infrastructure and the existing pedestrian and bicycle networks.

Resolution of the following is required, via condition if necessary:

Pedestrian access	Ensure the footpath along the eastern edge of Hill Road is kept clear during all construction (including construction fences and footings). It will also be important to ensure that the proposed facility is well-connected to the existing pedestrian and cycling network.
Bicycle parking	There is sufficient guest bike parking at the front, however no secure long term staff bike parking is provided. Generally, this is a rate of 10% of staff. Based on 47 staff this is 5 bike parking spots in a secure undercover location within the ‘staff only’ area of the building.

1.5 Social Outcomes

The cost of use to access the facility is not discussed in this application. Given that many communities within the Western Sydney region face economic disadvantage, a pricing mechanism should be secured to ensure that the facility is also a benefit to local communities.

Additional recreational offerings at the site, including a toddler pool, adventure playground, mini half pipe skate ramp, and climbing wall should be further clarified and secured.

The closest residential properties, located 400m west of the development site, have not been adequately consulted.

Further information is required in relation to the following:

Section/Issue	Comment
Page 23	That further detail or scope be provided in relation to the potential for benefits to disadvantaged communities articulated in the EIS on page 23.
P. 26	Provide further detail on other recreational infrastructure to be included in addition to the wave pool.
P. 57	In the Management Priorities section of the EIS, under Priorities for Sports & Recreation Parks, reference is made to the proposal delivering on the priority of “improve the quality and availability of sports fields…” Clarity is requested as to what sports fields are being provided as part of the proposal.

1.6 Public Health

Further detail of all food preparation/service areas are to be provided that indicate compliance with *Australian Standards* AS4674 (Food premises fit-out), Food Standards Code 3.2.3 (Food Premises and Equipment) and mechanical ventilation standard AS1668. Additional clarification is to be provided from NSW Health advising whether the facility is determined to be a *Public Swimming Pool* in determining required water treatment methods. As the treatment system specification currently relies upon the NHMRC and ANZEEC water treatment guidelines associated with a lake or natural waterway.

A strategy must be prepared to adequately manage the potential issue of the local endemic duck species using the artificial lagoon whilst the facility is not in operation.

Next Steps

The Council would like the opportunity to comment on further stages associated with the detailed design development of the site.

It is requested that this letter be provided to the proponent to help inform the detailed design of the facility and that the recommendations made will be addressed in the applicant's response to submissions. The Council would also welcome the opportunity to offer input on any conditions that the Department is considering in relation to any future consent.

Yours sincerely,

Myfanwy McNally
Manager City Significant Development

Attachment A – Detailed Comments

2.1 Environmental Outcomes

Council's Environmental Outcomes team have reviewed the EIS and considered the potential positive and negative environmental impacts of the proposal.

Section/Issue	Comment
Overall	Overall, the proposal represents a positive approach to environmental impacts and is generally supported.
Section 3.2	"Treatment system specification" – the EIS recommends using NHMRC and ANZEEC guidelines for working out what level of treatment should be applied to the pool. The guidelines are for natural waterways and lakes, and as such are not relevant to this facility, which should use the relevant swimming pool legislation and guidelines instead.
P. 63 of EIS	It is suggested that the use of a product such as WaterSavr be considered, which could potentially reduce water evaporation losses - see http://www.flexiblesolutions.com/products/watersavr/
Green Star rating	Council concurs with the Kinesis consultant's view that while Green Star might bring some rounding out of environmental design responsiveness, it is not going to be a prime driver for performance lift. It is recommended that SOPA seek a Green Star rating.
Energy use (Refer to Table Below)	It is essential that wherever section J of the NCC applies, the proponent exceeds section J minimum performance standards. This relates especially to: • insulation standards • energy smart glazing • lighting (watts per square metre of indoor illuminated areas) • water heating for domestic water supply (showers, taps, kitchens) • Efficiency of HVAC appliances With a history of 'gaming' of NCC Section J modelling tools, we seek DPE/SOPA support of the use of recent templates that the Better Buildings Partnership and the City of Sydney have developed and that UTS are already applying to new development within their jurisdiction. Council recommends that to increase confidence in exceedance against the very modest NCC performance standards, that these templates be referred to in the consent conditions. The

	recommended templates are attached (Attachment A). They encourage engineers / architects to be much more open about their design for energy efficiency.
Water usage	The proposed water roof harvesting and storage and re-use approach proposed in the EIS is supported. The Water Balance report by Urbaqua indicates storage capacity for subsequent re-use – 4 x 10kl = 40,000 litres. This appears to be underweight and Council suggests a review of this figure. This is akin to roof capture and re-use from 8-10 houses. Building in additional capacity at construction stage is logical and low-cost and achieves improved future proofing options. For example, tanks could be topped up from the SOPA scheme as a back-up reservoir for toilet flushing/ deck hosing/ roof cooling on extreme heat days.
Requirement for succinct Climate Change Adaption Plan	A succinct adaptation to CC Statement is required and should address how the development copes with and responds to: • Extended heatwave periods (how will construction materials cope with more 35 degree days per annum? What shelter can be provided for respite for both paying customers and others seeking shade protection?) • Extreme heat days – 45 degree days. How will materials cope (expansion, melting, deformation?) Evaporation rates etc.? • Extreme rainfall/hail events – high intensity rain / hail events. Gutters block? Internal flooding? Spillways for excess water?
Biodiversity	The biodiversity assessment is accepted as provided. The only question is: What is the strategy if ducks use the lagoon when waves are turned off? This is also a public health issue.
Light pollution	There is a need to minimise up-lighting/ pollution. Night use expected, but no clarity around how light pollution be controlled or managed.
Building and infrastructure re-use for alternative purposes	Building such a specific-purpose development comes with risk. If the project fails commercially in 5 years or 15, what are the smart-re-use options for the facilities, including the lagoon, have been considered? Can it be re-purposed for commercial or even environmental – passive recreation purposes?

Open Water Surf Sports Lagoon Facility Sydney Olympic Park - P5 (Pod B) Car Park Hill Road, Sydney Olympic Park - NCC Section J- Checklist to Ensure Exceedance

Compliance with *NCC Section J Energy Efficiency* minimum standards (via Deemed to Satisfy or JV3 Verification pathways) is mandatory across Australia. However, Section J is not a demanding performance standard. Further, it is common for fundamental good design for energy efficiency to be 'modelled out' of designs via the JV3 compliance pathway.

To ensure sound environmental performance of the proposed facility the proponent should confirm how their design will *exceed* the minimum standards of NCC Section J. Project mechanical engineering and/or ESD consultants can readily confirm that the design solutions promoted below can be accommodated within building design detailed DA stage

The design principles indicated in column 2 below demonstrate how the Proponent is able to *demonstrably exceed* the minimum standards set by NCC Section J.

Column 3 of the table below demonstrates the Proponent's commitments to include best practice energy efficient design into the development and is to be completed at DA stage.

Table 1: NCC Energy Efficiency Expectations and Responses Schedule

Section of NCC Section J	**Design for energy efficiency**	**Proponent's commitments (Proponent to complete this column) (note: please provide succinct design solution comment where appropriate)**
	There will be *no trade-off between building envelope components and building services in achieving NCC compliance*	
J 1.3, J 1.5 - Walls, Ceilings, Roofs	Confirmation that *thermal breaks* for roofs, ceilings and walls are incorporated wherever they would be required under NCC Deemed to Satisfy compliance pathway	
J 1.6 Building Fabric	Where *basement insulation* between occupied (e.g. retail, office, residential) and non-occupied spaces (e.g. car-parking, storage areas) would be required under NCC DTS pathway, this is	

	not to be traded away under NCC Verification pathway	
J 6 Artificial Lighting	Confirmation that *illumination power density* standards in NCC Section J Table J6.2a will be exceeded (i.e. *lower* maximum illumination power density values, on average, (W/m2) across the proposal than prescribed by NCC)	
J 7 Heated water supply	Confirmation as to how the proposal will *constrain the use of high greenhouse gas intensity sources of energy for water heating*. Solar, heat-pump, co-generation, heat reclamation or geothermal solutions are strongly preferred	