

Megan Fu
Division of Priority Projects Assessments
NSW Dept. of Planning & Environment
320 Pitt Street,
Sydney NSW 2000

Your Reference	SSD 9670
Our Reference	NCA/3/2019
Contact	Luca Chudleigh
Telephone	9806 5600
Email	LChudleigh@cityofparramatta.nsw.gov.au

28/06/2019

Dear Ms. Megan Fu,

**RE: WESTERN SYDNEY UNIVERSITY INNOVATION HUB (SSD 9670) – 2-6
Hassall St, Parramatta**

The City of Parramatta Council thanks you for the opportunity to comment on this proposal currently on exhibition.

Council has previously worked with the developer in relation to a planning proposal and site specific DCP to form the controls for the site. Please note that no determination should be made on this application until such time as the draft PP and draft DCP are finalised.

Council officers have reviewed the proposed development and request that the following matters are addressed by the applicant for further review:

Setbacks/Draft DCP Requirements:

The draft DCP for this site allows for a 3 storey podium with a 19 storey tower above. This proposal is inconsistent with the draft DCP as it proposes a 12 storey podium and 6 storey high-rise tower above. An increased podium of this scale is likely to have more adverse impacts on the surrounding area in terms of heritage and scale.

It is also noted that the setbacks in the current scheme differ from those endorsed by Council on the 11 March 2019. The setbacks proposed are non-compliant in the following manner:

Boundary setbacks (3 storey podium)

	DCP (absolute)	Proposed	Compliance
North	3m	1.89m – 3.3m	No
South	2m	2.9m	No
East	0m	0m	Yes
West	0m	3.3m – 5.5m	No (but control relevant to 3 storey podium)

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Boundary setbacks (above 3 storey)

	DCP (min)	Proposed	Compliance
North	6m	2.3m – 6.9m	No
South	6m	2.9m	No
East	3m	0m	No
West	6m	3.3m min (podium levels 4-12) 10m – 13.5m (tower only)	No Yes

This non-compliance from the Councils endorsed position is considered to be unsatisfactory due to the impacts on surrounding development, including Lancer Barracks heritage precinct and the Commercial Hotel.

Urban Design (Public Domain):

- Demonstration of how the future through-site link will work. This needs to be demonstrated with design options and levels.
- The Hassall St façade presents little activation of the public domain with the presence of a lab, a driveway and a substation. The applicant should consider a redesign to present better activation.
- Building columns along the footpath on Hassall St are not encouraged since they disturb a continuous line of travel and fail to provide a consistent shoreline. The applicant is required to provide a legible shoreline along the public domain along Hassall Street. The shoreline does not need to be a continuous line of TGSIs. The applicant is encouraged to explore and present textures in paving, while keeping the material consistent, to enable detection. Shore-lining principles should follow AS 1428.
- Ensure the bicycle stands sit outside the shoreline.
- The public domain through the future through-site link requires a shoreline to ensure all pedestrians are able to traverse through it.
- The bollards shown at the driveway crossover of Hassall street footpath are not recommended. These should be replaced with warning TGSIs.
- Street tree soil volumes and planting details should be as per the Parramatta Public Domain Guidelines 2017.
- Street lighting seems to be missing from the public domain plan.
- Explore relocating the substation to next to the retail at the boundary with the Commercial Hotel or in another area. Any required vehicular access to the substation needs to be demonstrated.
- Ensure slabs within apparent public domain are separate along the property boundary and that the property line is demarcated within the public domain in some manner.
- Ensure water positively drains away from the building edge and property line. Detailed levels are required to demonstrate this.

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Universal Access Requirements:

Ground Floor:

- All doorways from the retail areas leading to the plaza must provide low level thresholds with a construction tolerance of no more than 3mm.
- Ensure the doors from the retail areas leading to the plaza provide a clear opening of 850mm including the active leaf of any set of double doors.
- Ensure there is the correct latch side clearances for the doors leading to the amenities.
- Ensure the bleachers also provide an area of accessible seating including compliant arm and back rests.
- To reduce the risk of a person with vision impairment colliding with the columns, ensure provision of a minimum luminous contrast of 30% to the paving.

Terrace (level 10 & 12):

- All doorways from the level 10 and 12 areas leading to the terrace must provide low level thresholds with a construction tolerance of no more than 3mm.
- Ensure the doors from both floors leading to terraces provide a clear opening of 850mm including the active leaf of any set of double doors. This should also apply to the doors providing access to amenities.

Drawing requirements:

Amended documentation is to include the following:

- *Public Domain Alignment Drawings* showing existing and proposed levels for roads, kerb and gutter, footways, forecourts and through-site links. The drawings should clearly show positive drainage away from the building and interfaces of the public domain and new building entries via a series of engineering cross and long sections, along with a preliminary public domain plan showing proposed general layout of elements, services and finishes. All drawings to be prepared in accordance with the requirements outlined in Chapter 2 of the Public Domain Guidelines (ref: <https://www.cityofparramatta.nsw.gov.au/business-development/public-domain-guidelines>).
- *Landscape drawings* for internal site areas showing all proposed boundary treatments and compliant private and communal open space areas including levels.

ESD:

A review of the SSDA against the ESD related Design Excellence requirements has been conducted and the following comments are provided:

- The jury report mandates that a minimum 30% of the northern façade is shaded at 1pm, December 21st and this has been satisfied. This detail should be retained in any approved scheme.

ESD Performance has not been adequately addressed in the ESD report or other documents provided. The following shortfalls should either be addressed in a revised

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report or dealt with via conditions of consent.

- The office components of the building will be designed and constructed to operate at a minimum NABERS Energy rating of 5.0 stars without accounting for any Green Power used in the building and a NABERS Waters rating of 4 stars. A commitment agreement for the NABERS ratings is to be entered into with the NSW Office of Environment and Heritage.
- A dual reticulation (dual pipe) system is to be installed, with the dual reticulation system being of sufficient size to supply all non-potable water uses of the building and suitable for future connection to a recycled water main.
- Capture all rainwater on site and provide sufficient storage for reuse of 95% of all annual rainfall to offset potable water uses.
- LED lighting to be provided throughout.
- Outdoor air ventilation rates to exceed the relevant Australian Standard by no less than 50%.
- Limit the use of PVC with minimum replacement of 60% (by cost) compared to standard practice.
- 95% of all timber used on the project is to be FSC Certified under the Forest Stewardship Council certification system.
- All lifts to be gearless with regenerative drives. Passenger lifts to have destination control.
- The development is to maximise the renewable energy produced by PVs installed on the roof to be demonstrated through the provision of maximised area and optimum orientation and efficiency of PV panels. Installed area of PVs on the roof is to be no less than 600m².

The ESD report also fails to address the following ESD requirements of the SEARS (Part 7):

- Include a framework for how the future development will be designed to consider and reflect national best practice sustainable building principles to improve environmental performance and reduce ecological impact. This should be based on a materiality assessment and include waste reduction design measures, future proofing, use of sustainable and low-carbon materials, energy and water efficient design and technology and use of renewable energy.
- Include preliminary consideration of building performance and mitigation of climate change, including consideration of Green Star Performance.
- Provide a statement regarding how the design of the future development is responsive to the CSIRO projected impacts of climate change, specifically:
 - Hotter days and more frequent heatwave events
 - Extended drought periods
 - More extreme rainfall events
 - Gustier wind conditions
- Additionally, the ESD report relies on some initiatives that are not evident in the proposed design such as a naturally ventilated atrium.

We recommend that the ESD report is not relied upon and is either amended or appropriate conditions of consent be written to address the short comings.

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Wind:

The wind study recommends the addition of a canopy, to be detailed at a later stage, which protects pedestrians from downdraft from the tower façade. Also recommended are interventions within the plaza. These are important design requirements and material to the SSD assessment.

- Council recommends all the wind impacts are adequately resolved prior to consent.

Stormwater:

- Stormwater disposal must be in accordance the Council's DCP 2011 including provision of On Site Detention and Water Sensitive Urban Design.
- The development shall include construction of a piped drainage line with kerb inlet pits along the kerb line of Hassall St from the site eastwards, then crossing Hassall St to the point of connection near 13-15 Hassall St. This must be a minimum of a 375mm diameter concrete spigot and socket pipe in accordance with Council standards. Engineering details must be submitted to Council for construction approval prior to commencement of works.
- OSD tank location should be reconsidered to ensure surcharges do not cause property damage. Reliance on a piped overflow is adequate as part of the mitigation measure but should not be the only solution.
- OSD tank design shall consider provisions for regular and unobstructed access, maintenance and natural ventilation of the system.
- Alternative measures shall be considered for the overflow discharge that does not have the potential to cause unwanted hazard and nuisance to passing pedestrians.
- The stormwater drainage design is to consider any flows from the upstream property and ensure that they are not impeded or concentrated onto neighbouring properties. An allowance can be made for these to be conveyed to the point of discharge separate to the OSD system or accepted into the OSD tank provided additional OSD storage volume is provided in accordance with Section 4.1.3 of UPRCT OSC Handbook (4th edition).
- Stormwater drainage design is to consider the effects of wind driven rain being intercepted by the vertical faces of the building in the sizing of the drainage infrastructure provided.
- Localised sumps shall be provided adjacent to the orifice plate in accordance with Section 6.6 of the EPRCT OSD Handbook (4th Edition) for hydraulic performance and to minimise ponding volumes.
- The orifice plate shall be constructed from stainless steel plate in accordance with the requirements of Section 4.2.3 of the UPRCT OSD Handbook (4th Edition).
- Any seepage discharged to Council's stormwater drainage system is to be treated to meet water quality standards specified in the DCP 2011 and any additional requirements set by the EPA.
- Must ensure that adequate sight distance in accordance with AS2890.1-2004 is achieved at the basement entry driveway.

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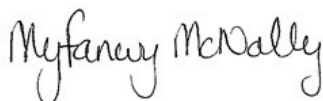
Recommendation:

The applicant is requested to revise and resubmit the drawings and information based on the comments provided above.

These drawings should be submitted along with a written response to the comments in a tabular form and addressed to the Group Manager - Development & Traffic Services, before a more detailed assessment can be undertaken.

We look forward to working with the applicant and the Department to progress the development of this site. Should you require any further information in this regard please contact Luca Chudleigh on 9806 5915.

Yours sincerely,



Myfanwy McNally
City Significant Development Manager

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