

Emily Dickson  
Department of Planning and Environment  
320 Pitt Street  
Sydney NSW 2001

<b>Your Reference</b>	SSD 8800
<b>Our Reference</b>	NCA/8/2017
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21/03/2019

Dear Ms. Dickson

**RE: Request for EIS Comments – Parramatta Leagues Club Hotel at 1 Eels Place, Parramatta (SSD 8800)**

The City of Parramatta Council thanks you for the opportunity to comment on the proposal currently on exhibition. The proposed hotel development will complement the stadium entertainment precinct and enhance the Park's status as a home for major sporting events and recreational activities.

Internal departments have reviewed the documentation that accompanied the proposal and the City of Parramatta requests that the proposal address the matters referenced below. 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.

In summary, notwithstanding the Design Integrity Panel process applied to this proposal, Council has concerns with the bulk, scale and height of the development from a planning perspective.

## Land Use Planning

Council notes that the proposal is significantly higher than allowed under existing planning controls to surrounding areas and building height planning controls currently endorsed in the Parramatta CBD Planning Proposal. This is of concern to Council given that the additional height beyond adjacent controls will add inappropriate scale and bulk to the development. As such, we request that the proposal is examined in the context of adjacent height controls, which is considered to provide an appropriate assessment framework.

The tower will have a dominant place in views from the north and east along O'Connell Street, and Ross Street as well as Parramatta Park to the west. Existing tree canopies may diffuse some of the visual impact of the building's height. However, given the potential impact on the protected Parramatta Park, World Heritage Listed Old Government House and National Listed Parramatta

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Female Factory, the proposed building must meet all relevant controls, namely Park Edge Special Area built form controls Area A1 – Parramatta Leagues Club Site – within *Parramatta Development Control Plan 2011*.

It is recommended that in light of the recent changes to the potential development within the Parramatta Growth Centre (Parramatta North Urban Transformation Strategy), the height, bulk and scale of the development, be reviewed in the context of comparable future built form changes as a consequence of the University of Sydney developing a campus to the north of the site.

The applicant has sought consideration of a reduction to the financial contribution ordinarily payable, "given the nature of the uses provided, the wider benefits and the considerable contribution that will be needed as a license fee for the use of the land". The proposal does not meet the contribution exemption criteria for development types set out under Section 3.6 of the Council's S94A Development Contributions Plan (Amendment No. 5) or Clauses 25J and 25K of the *Environmental Planning and Assessment Regulation 2000*. In addition, Section 3.7 of the plan states that no discount to the contribution is permitted. Therefore, Council requests that the development be subject to a levy and that no discount or exemption be considered.

## Urban Design

Council recommends that the public domain is reconsidered, with an aspiration to create a pedestrian precinct that is seamlessly integrated into the context and provides continuity of access to the stadium perimeter. A greater emphasis must be placed on circulation access provided by the northern access road acting as an extension of the Little Coogee Heritage Walk and a southern pedestrian link from the hotel courtyard to the stadium forecourt. Furthermore, additional tree planting must be incorporated along O'Connell Street, the northern access road and around the O'Connell Street Gatehouse. Soft landscaping and illumination provisions are encouraged within the laneway separating the multi-storey carpark and hotel. As detailed within traffic comments above, the deviation of the northern access road pedestrian road crossing is not supported on safety grounds and must be redesigned accordingly.

## City Architect

The City Architect's Team was a member of the Design Integrity Panel associated with the application. In order to uphold the integrity of the design excellence process throughout the various stages of development, panel members should be provided with the opportunity to review and comment on critical design junctions. (Refer to Attachment A for Draft Condition)

## Traffic and Transport

The pedestrian crossing and median located in close proximity of O'Connell Street and the northern access road does not comply with the relevant Australian Standards, Austroads guidelines and RMS supplementary technical directions. This treatment must be redesigned to ensure appropriate road safety measures are implemented.

The City of Parramatta Council's Bike Plan proposes extending the O'Connell St shared path north of Victoria Rd to Fennell St and create a connection from O'Connell Street to the Parramatta River Foreshore. The development would need to provide a 3m wide path from the proposed new street to the northern edge of the O'Connell St Gatehouse frontage with associated regulatory signage (red arrow) tying into paving outside the leagues club.

Council supports the Green Travel Plan strategy and recommends the submission of a draft plan prior to assessment finalisation and that sustainable commitments are secured via consent conditions.

There is no proposed bicycle parking for staff provided as part of the development. Council recommends that Staff bike parking (and associated showers & lockers) are incorporated, the submission of a Bicycle Parking and Storage Management Plan and short stay (or visitor) bike racks in proximity of the hotel entrance for fitness club members.

Consent conditions must nominate Council as a review authority of the Construction Traffic Management Plan and all construction related traffic movements.

## **Civil Assets and Infrastructure**

The current plan set should be amended to include restoration works to all footpaths contained within the site frontages, in particular along the O'Connell Street Gatehouse and in direct alignment with the proposed hotel. This will minimise risks to pedestrian safety of future patrons and the public making use of the wider entertainment precinct.

## **Catchment and Development Engineering**

The design of the basement must incorporate tanked (waterproofed) construction, as the permanent pump out of groundwater from behind the basement walls is not permitted. Any critical plant and storage areas within the basement or below ground level are to be flood proofed. The proposal must adequately demonstrate that OSD is not necessary and justify the contravention of Council's Development Control Plan standard.

Council has reviewed the accompanying flood and drainage documentation against the previously requested SEARs information (31/10/2017). It is noted that overland flow flood information was not incorporated within the analysis to inform building levels, a flood emergency response plan is not provided, PMF mitigation, landscape and bio-retention measures are not prescribed. Moreover, the Construction Environmental Management Plan has not detailed site protection measures implemented to mitigate flooding impacts (rainfall).

## **Ecologically Sustainable Development**

The application does not meet the part 11 of the SEARs or the contemporary good practice standard for ESD, given the supporting report has not outlined how best practice ESD principles will be incorporated or how these measures are to be implemented. The majority of these strategies would need to be evident on the DA drawings if they were to be accommodated and there is no evidence of any ESD initiatives be accommodated in either the design or the cost plan.

The architectural drawings indicate interstitial timber louvres within all glazing and operable windows to hotels rooms. This provision is supported by Council and should be referenced within the ESD report.

Council considers the proposed 4 Green Star insufficient to meet the SEAR requirements and is concerned the proposal has not addressed resource consumption, energy and water targets, energy alternatives, water supply, rainwater harvesting, proposed end uses of potable and non-potable water, demonstration of water sensitive urban design and any water conservation measures. Accordingly, the ESD report must be updated to incorporate the above matters, ESD related design elements and include a NABERS Energy commitment for Hotels rating greater than 5 stars.

## **Social Outcomes & Recreation Planning**

The information package submitted has not addressed Council's SEARs requirement for a Social Impact Assessment to be included within the supporting documentation. As noted in our original advice, the Plan of Management is to be accompanied by a SIA with detailed requirements nominated in Attachment A.

## **Open Space & Natural Resources**

Council acknowledges that a thorough assessment has been undertaken in relation to the effect of the built form on the nearby Grey Headed Flying-Fox camp. Notwithstanding, this has not been provided in relation for the endemic bird population. Potential mitigation strategies to minimise bird collision include the use of UV reflective and/or patterned glass or consider the addition of a green wall and/or roof to limit glass surfaces and stormwater runoff.

## **Crime Prevention**

Council's Crime Prevention team has reviewed the proposal and recommended the inclusion of Closed Circuit Television Cameras (CCTV) in the surrounds of the development, given the site incorporates a licensed premise and is located within a wider entertainment precinct / transport corridor.

## Public Art

Appropriate conditions requiring the development of an Arts plan, stipulating a particular value and requiring Council sign off should be included in any future consent.

## Next Steps

Council would like the opportunity to comment on further stages associated with the detailed design development of the site. It is considered that many of these issues can be worked through with further collaboration between the project team and Council and it is suggested that a series of meetings be organised to facilitate further design development.

Council requests 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. We would also welcome the opportunity to offer input on any conditions that the Department is considering in relation to any future consent.

Yours sincerely,



Mark Leotta

Group Manager- Development and Traffic Services

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## **Attachment A**

### **1. Land Use Planning**

#### Height and Bulk Impacts

Council has noted that in contrast to the indicative SEARS built form, the submitted EIS Plans have increased the height of the hotel from 15 to 17 storeys with a height of approximately 62m (RL 75) above the existing ground level. This is significantly higher than heights allowed under existing planning controls to surrounding areas (which range between 9m to the east, 11m to the south-east, and typically ranging from 21 to 28m to the north under the Parramatta Local Environmental Plan 2011. This is of concern to Council given that it will add additional scale and bulk to the development and as such, Council requests that the proposal be considered in the context of height controls

applicable to sites that are in closer proximity to the development.

Nearby height, controls under the Draft Parramatta CBD Planning Proposal to the east and south-east propose a maximum Incentive Height of Buildings control between 9 and 11 metres – maintaining the current controls in respect of the proximity to the North Parramatta heritage conservation area. The proposed development is significantly higher than surrounding building height planning controls currently endorsed in the Parramatta CBD Planning Proposal.

The proposed development will have the tower component as a slender building above a four-storey podium. Distant views to the development from the south and south-west will be ameliorated by the significant height and bulk of the Western Sydney Stadium in front of the proposed hotel tower. However, the tower will have a dominant place in views from the north and east along O'Connell Street, and Ross Street as well as Parramatta Park to the west. Existing tree canopies may diffuse some of visual impact of the building's height. However, given the potential impact on the protected Parramatta Park, World Heritage Listed Old Government House and the National Heritage Listed Parramatta Female Factory, the proposed building must meet all relevant controls. In relation to the latter, Council is concerned that the proposed height would visually dominate the southern vista from the Parramatta Female Factory and interfere with any future consideration to have the already nationally significant item recognised as a World Heritage Site (Australian Convict Sites World Heritage Property).

The development must comply with the Park Edge Special Area built form controls Area A1 – Parramatta Leagues Club Site – within *Parramatta Development Control Plan 2011* apply to this development. The relevant controls require:

- (a) At least 80% of the building height to be contained below the level of the surrounding tree canopy of Parramatta Park when viewed from any of the key viewing locations shown in Figure 4.3.3.7.7. Any building element must be oriented so as to minimise the visual impact from these locations.
- (b) External building materials must be muted in colour with matt finishes to minimise contrast with the park surrounds and be complementary to its setting.
- (c) Signage on the upper level of buildings must not face the Domain of Parramatta Park.

These controls are of particular relevance to address the Conservation Agreement as set out in the SEARS.

The Applicant's Statement of Heritage and Visual Analysis (Appendix G) responds to this particular issue in part. When considering the analysis supplied by the applicant, the view corridors assessed indicated that the proposed development could meet the controls of Area A1.

The height of the development should be reviewed in the context of any future built form changes as a consequence of the University of Sydney developing a campus on the Parramatta Growth Centre site. (Formally, known as the Parramatta North Urban Transformation Strategy).



### Overshadowing

In a review of the supplied shadow analysis, it was noted that the majority of the shadow from the proposed development would be contained within the site or shadowing Bank West stadium to the south. The development will overshadow the Our Lady of Mercy school site from about 2:30pm and certainly at 3:00pm. The development will not overshadow properties within the North Parramatta heritage conservation area to the east, Prince Alfred Square to the south-east or significant open space areas in Parramatta Park to the west. As such, Land Use Planning has no objection to the development in terms of potential overshadowing.

### Developer Contributions (S. 7.12)

The development is subject to the *City of Parramatta Council S.94A Development Contributions Plan (Amendment No 5)* – effective from December 2017. This Contributions Plan imposes a 1% levy on development exceeding \$200,000 for a development of this type and cost.

The applicant has sought consideration of a reduction to the contribution “given the nature of the uses provided, the wider benefits and the considerable contribution that will be needed as a license fee for the use of the land”. It is noted that the proposal does not meet the contribution exemption criteria for development types set out under Section 3.6 of the Contributions Plan or Clauses 25J and 25K of the *Environmental Planning and Assessment Regulation 2000*. In addition, Section 3.7 of the plan states that no discount to the contribution is permitted.

Therefore, Council requests that the development be subject to a levy based on the development cost calculated in accordance with the terms of the City of Parramatta Council S.94A Development Contributions Plan (Amendment No 5) and Clause 25J of the EP&A Regulation 2000 and that no discount or exemption to the levy is considered.

## **2. Urban Design**

### Movement & Circulation

Council's urban design team request the following amendments:

- All drawings must be updated to show the future stadium circulation access from the northern access road (Little Coogee Heritage Walk), as these details appear to be missing on some plans;
- The proposed trees at the southern side of the building adjacent to the road should integrate with the alignment of the footway;
- Where vehicle-turning radii are not impeding, tall canopy street trees in deep soil should be included at the median of the northern access road (Little Coogee Heritage Walk);
- The design of the footway, hotel vehicle entry and northern access road (Little Coogee Heritage Walk) should incorporate a direct pedestrian connection (pedestrian cross walk and lane/ arcade) southwards that links the hotel entry courtyard to the stadium forecourt.

This future link should be shown on the drawings, namely a precinct masterplan;

- The primary pedestrian east-west link runs adjacent to the southern site boundary (Little Coogee Heritage Walk). As such, the northern access road (Little Coogee Heritage Walk) is to be structured and visually detailed to present as a public street;
- The Laneway between hotel and multi storey car park is to be well illuminated at night. Detailed public domain lighting plans should be provided for assessment or at a minimum included as a consent condition;
- Appropriate soft landscaping should be integrated along the lane to reduce the visual impact of the car parking structure and hotel overhead;
- Relocate pedestrian road crossing at the intersection of northern access road (Little Coogee Heritage Walk) and O'Connell St is to be aligned with direct pedestrian path of travel. As a consequence, the dogleg path alignment should be realigned with O'Connell St and all landscape obstructions must be removed; and
- Street trees should be included along O'Connell St for the full length of the Gatehouse site street frontage. In addition, canopy trees are to be provided along the northern side of the access road (Little Coogee Heritage Walk) and planted within the Gatehouse site no closer than 3m to buildings or structures. The location and number of trees must respect heritage value and visual access of the O'Connell Street Gatehouse.

#### Materials, Finishes and Planting

Materials for paving and finishes to the ground plane are to be consistent with those used around the stadium and not create considerable levels of contrast. The proposal is to maximise deep soil zones for new large canopy trees at the road edge and around all retained trees.

### **3. City Architect**

The City Architect's Team was a member of the Design Integrity Panel associate with the application. In order to uphold the integrity of the design excellence process throughout the various stages of development, panel members should be provided with the opportunity to review and comment on critical design junctions. To secure these requirements the following consent condition is recommended:

*In order to ensure the design excellence quality of the development is retained:*

- (a) The architectural design team comprising **Hassell** is to have direct involvement in the design documentation, contract documentation and construction stages of the project (including signing off any required certifications at DA, 4.55 Applications, and Construction Certificate and Occupation Certificate stages).*
- (b) The design architect's team is to have full access to the site, following appropriate safety inductions, and is to be authorised by the applicant to respond directly to the consent authority where information or clarification is required in the resolution of any design issues throughout the life of the project.*



- (c) *Evidence of the design architect's team commission is to be provided to the Council prior to release of the relevant Construction Certificate.*
- (d) *The Design Integrity Panel is to review and provide comment on the architectural drawings, landscape drawings and samples of all external materials, in particular the external glazing and façade detailing to ensure the scheme remains substantially the same as the panel endorsed scheme prior to the issue of any relevant Construction Certificate and any Occupation Certificate.*
- (e) *The design architect of the project is not to be changed without prior notice and approval of the Design Integrity Panel.*

*The Principal Certifying Authority must be satisfied that the above matters have been complied with prior to the issue of a relevant Construction Certificate, in accordance with written confirmation from City of Parramatta Council.*

## **4. Traffic and Transport**

### Ross Street Pedestrian Crossing

The Architectural Plans show that the access road includes a pedestrian treatment near the intersection of O'Connell Street and the northern access road. This proposed treatment does not comply with RMS technical directions and will cause safety issues for pedestrians, as the priority between vehicles and pedestrians is not clearly established. Furthermore, the median provides a false sense of security for pedestrians, but offers no physical separation or protection.

The design of the access road off O'Connell Street and the associated pedestrian treatment must comply with the relevant Australian Standards, Austroads guidelines and RMS supplementary technical directions to ensure that appropriate road safety measures be provided for pedestrians where the access road intersects O'Connell Street.

### Path Network

The City of Parramatta Council's Bike Plan proposes extending the O'Connell St Shared Path north of Victoria Rd to Fennell St. The development would need to provide a 3m wide path from their new street to the northern edge of the O'Connell St Gatehouse frontage with associated regulatory signage (red arrow) tying into paving outside leagues club. The Northern access road reserve width may need to be adjusted to allow for this access arrangement.

The Traffic and Accessibility Impact Assessment report (p29) states: the proposed hotel development seeks to widen the new Stadium vehicle access between the Stadium and Parramatta Leagues club sites to facilitate a dedicated pedestrian and cycle path between O'Connell Street and the Parramatta River foreshore. This connection will improve the east west pedestrian and cycle access to the Parramatta parklands. However, from the plans this appears to be wide enough for a footpath only. On this basis, Council prefers the implementation of a shared user path as proposed in the report and this needs to be reflected on the architectural plans.

#### Green Travel Plan

The Traffic and Accessibility Impact Assessment report (p46-47) refers to a Green Travel Plan. Council supports this strategy and recommends that a draft plan is provided prior to assessment finalisation and that sustainable commitments are secured via consent conditions.

#### Bike Parking

There is no proposed bicycle parking for staff provided as part of the development.

City of Parramatta's endorsed Bike Plan states, "For all new office buildings with a floor space over 600m should include end of trip facilities including lockers and showers, to encourage and facilitate cycling to work". Although, not an office development by definition, the hotel is an employment generating use, obligating the need for sustainable transport alternatives. Therefore, the Bike Plan would need to be applied at the rate of 0.2 bicycle spaces per car parking space. This would ensure consistency with the Guide to Traffic Generating Developments and the Austroads (2008) Guide. Council recommends that:

- Staff bike parking (and associated showers & lockers) at these rates needs to be provided as part of this development;
- Provide a Bicycle Parking and Storage Management Plan including information regarding the available bicycle parking facilities for staff and visitors and how these facilities will be managed; and
- A fitness club in this location (and the proximity to Parramatta Park) would also generate short stay (or visitor) bike parking and necessitate the provision of bicycle racks under cover and in close proximity to the main entrance.

#### Construction Traffic Management Plan

Consent conditions must nominate Council as a review authority of the CTMP and all construction related traffic movements.

## **5. Civil Assets and Infrastructure**

The current plan set does not include the restoration works to all footpaths contained within the site frontages. Particular reference is made to the footpath adjacent to the O'Connell Street Gatehouse that is in a state of disrepair and could pose potential risks to future patrons and the public making use of the wider entertainment precinct. At a minimum, the footpath along O'Connell Street that directly aligns with the proposed hotel should be upgraded to provide sufficient levels of pedestrian safety.

## **6. Catchment and Development Engineering**

The design of the basement must incorporate tanked (waterproofed) construction, as the permanent pump out of groundwater is not acceptable. Any critical plant and storage areas within the basement or below ground level are to be flood proofed.

It is probable the on-site detention (OSD) is not required because of the site's proximity to the Parramatta River and the likelihood that delaying discharge would increase flood peaks. Notwithstanding, the proposal must adequately demonstrate that OSD is not necessary and justify the contravention of Council's standard Development Control Plan.

Council has reviewed the accompanying flood and drainage documentation against the previously requested SEARs information (31/10/2017). It is noted that the following data has not been provided or incorporated:

- Overland flow flood study;
- The flood planning level has not considered the rainfall overland flow flood level or used this data to inform the finished floor levels of any habitable or residential rooms;
- Mitigation measures needed to withstand flooding to the PMF, including debris impact loads, flotation and scour and the use of flood compatible materials;
- A Flood Emergency Response Plan demonstrating how emergency services can gain access for rescue and how occupants may evacuate during floods up to the PMF. This Plan must also address any 'shelter in place' strategies that may be necessary, including providing safe refuge for the public, with facilities to secure potable water supply, washing facilities, power generation, refrigeration and food storage, sanitary facilities' treatment and disposal, emergency communications systems, a reasonable level of comfort and the like. The proposal must include estimated numbers of people likely to be using the facility, duration of floods and post flood refuge;
- WSUD modelled is detailed, however it appears to solely rely on 'end of pie' proprietary treatment, without the inclusion of landscape and bio-retention measures. Moreover, the MUSIC or equivalent modelling is not provided to demonstrate achievement of Council's water quality and pollutant reduction goals; and
- The Construction Environmental Management Plan has not detailed site protection measures flooding impacts (rainfall).

## **7. Ecologically Sustainable Development**

The application does not meet the part 11 of the SEARs or the contemporary good practice standard for ESD. Specifically, the provided ESD report has not outlined how best practice ESD principles will be incorporated or how these measures are to be implemented. The ESD reports only recommends strategies for potential adoption and there is no evidence of any ESD initiatives accommodated in either the architectural design or the cost plan.

The architectural drawings indicate interstitial timber louvres within all glazing and operable windows to hotel rooms. This provision is supported by Council and should be referenced within the ESD report.

Council considers the proposed 4 Green Star insufficient to meet the SEAR requirements and is concerned the proposal has not addressed resource consumption, energy and water targets, energy alternatives, water supply, rainwater harvesting, proposed end uses of potable and non-potable water, demonstration of water sensitive urban design and any water conservation measures. Accordingly, the ESD report must be updated to incorporate the above matters, ESD related design elements and include a NABERS Energy commitment for Hotels rating greater than 5 stars.

## 8. Social Outcomes & Recreation Planning

The information package submitted has not addressed Council requirement for an SIA to be included within the supporting documentation.

As noted in our original advice, the Plan of Management is to be accompanied by a SIA that at a minimum addresses the following:

- Management of any liquor and gambling related uses of the site in context to the adjacent Parramatta Leagues Club and the future stadium operation;
- Access of the community to the proposed wellness centre including affordability of fees and charges;
- Amenity and safety;
- Pedestrian safety;
- Short term construction issues and impacts;
- Accessibility and Universal Design;
- Heritage impacts, particularly for Aboriginal and Torres Strait Islander Community;
- Visual screening of the site from Parramatta Stadium;
- The potential impacts on adjoining recreational land and its public use by community members;
- Community and stakeholder engagement/ plans; and
- The recreation services proposed to assist in meeting Community need for recreation infrastructure (Refer to City of Parramatta Council's draft Social Infrastructure Strategy).

## 9. Open Space & Natural Resources

### Grey-Headed Flying Fox

As previously advised, the proposed 17 storey hotel (62m) will result in a significant building height increase in proximity (approximately 100m) to the nearby Parramatta River corridor, which is in proximity to a 'nationally significant' Grey-headed Flying Fox camp. The submitted Biodiversity Development Assessment Report (BDAR) identifies that the main Grey-headed Flying Fox flyways are located north-south along the Parramatta River and that no significant habitat is to be affected by the proposal. Whilst the BDAR acknowledges that the new building will interrupt a minor flight path for some occupants of the nearby Grey-headed Flying Fox camp, this is unlikely to have a significant impact due as the species is likely to adapt and fly alternative routes. Any potential indirect impacts to the camp during works will require the mitigation measures as per a Biodiversity

Management Plan (CEMP sub-plan) consistent with that implemented for the adjoining Western Sydney Stadium.

#### Bird Collisions

There is significant evidence that the increasing prevalence of tall glass buildings is resulting in substantial mortality rates of urban birds due to collisions. It is the reflectivity and transparency of glass that poses significant hazards to birds, as unlike humans, they are unable to see external glazing and assume that they can fly straight through whilst attempting to access potential perches, plants, food or water sources, or other attractors within buildings.

As the amount of glass typically increases with the size of the building, taller buildings pose increasing risk to our urban native birds. However, the potential for collisions can be reduced through design solutions such as:

- Patterned or UV reflective glass (as birds can see the reflected UV light whereas humans cannot, therefore they will be able to recognise the presence of the glass barrier without it affecting the visual aesthetic of the building); and
- Green walls and other façade treatments to minimise large expanses of glass surfaces.

The proposed 17 storey building is likely to comprise a large amount of external glass, the potential for bird collisions is an important design consideration that needs to be addressed in the context of the Parramatta River wildlife corridor). Accordingly, the proposal needs to demonstrate how the building design and materials will minimise the potential for bird collision.

## **10. Crime Prevention**

Council's Crime Prevention team has reviewed the proposal and recommended the inclusion of Closed Circuit Television Cameras (CCTV) in the surrounds of the development, given the site incorporates a licensed premise and is located within a wider entertainment precinct / transport corridor. It is requested that the venue operator and Council enter into discussions in relation to linking CCTV networks.

## **11. Public Art**

Council consider that CoP's Public Art Guidelines for Developers should be used to guide the inclusion of public art in the development.

These Guidelines outline a process for the development of locations for public art and possible themes for public artworks. In general such a process ensures a good result, being work that has been considered by some independent and expert opinion, work that is site specific, that is sensitive to history, and relates to the "story" of the site and its development.

The Guidelines also propose a budget calculation of half of one percent of the construction budget. Once agreed, this should form a condition of the project. City of Parramatta Officers with expertise in this area are open to meeting the proponent to discuss the development of an Arts Plan as part of the development consent.