

**Date: 16 December 2021**

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4 Parramatta Square  
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Parramatta  
NSW 2150

**Re: Parramatta Leagues Club Hotel (SSD 8800) – Response to Submissions**

Dear Mr Piovesan

This letter constitutes a Response to Submissions (RtS) in accordance with Clause 8(3)(g) of the Environmental Planning and Assessment Regulation 2000. Specifically, this responds to all submissions, grouped by those made by government agencies, utilities, community organisations, interest groups and elected officials and public submissions, and to the letter from the (then) Department of Planning and Environment (now DPIE) dated 1 April 2019, including the specific issues requested to be addressed.

**Declaration:**

I declare that I have, with the assistance of other experts and the client, prepared this Response to Submissions. To the best of my knowledge:

- (a) It is in accordance with the requirements of the Environmental Planning and Assessment (EPA) Act 1979 and Regulation 2000;
- (b) This Statement contains all known available information that is relevant to the environmental assessment of the proposed development;
- (c) The information contained in this Statement is neither knowingly false nor misleading.

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**Signed:**



Mr. Jason Perica  
B.Sci. (Arch), MU.R.P.

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## 1 - Introduction

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### 1.1 Background

The Environmental Impact Statement (EIS) and supporting plans and documents for the proposed subject hotel development (being State Significant Development Application SSD 8800) was exhibited in early 2019 for around 2 months. The exhibition period was extended by the NSW Department of Planning and Environment (DPIE), in response to various requests. This extension of exhibition was supported by the applicant.

A total of 90 submissions were received, including:

- 9 by public authorities, including a Federal Government authority, State Government agencies and Parramatta City Council;
- 2 from utility providers;
- 3 from community, interest group or elected representatives; and
- 76 from the public.

DPIE submitted a letter to the applicant dated 1 April, 2019, requesting certain matters be addressed in the Response to Submissions (RtS). This RtS responds to those issues in addition to the issues raised in submissions.

There has been a considerable delay of approximately 2.5 years since the close of the exhibition. The delay was due to three (3) main issues:

- (a) Delays arising from the completion of the adjoining Parramatta Stadium (March 2019), including securing a copy of the Operational Event Management Plan of the Stadium which was being reviewed during and after commencement of events at the stadium;
- (b) Delays indirectly related to machinery of government changes in 2019 and difficulties in securing owner's consent for the access proposed from the adjoining site to the south, owned by Venues NSW (VNSW); and
- (c) Consequential revisions to the proposal arising from reduced building height and the revised access arrangements to the site and from submissions, including additional supporting visual modelling and supporting reports.

As part of considering submissions and further consultation, the applicant has decided to make a number of changes to the proposal, and to provide additional analysis and testing to address issues raised.

The main issues raised in submissions related to heritage impacts from the proposed building, related height/scale of the proposal, and access/traffic issues. Two relatively significant changes have been made in regard to these key issues, specifically the reduction of two storeys (and 19 hotel rooms), accounting for an approximate 15% reduction in floorspace, and changing the proposed vehicular access from the adjoining southern accessway on VNSW land, to Eels Place. This latter access arrangement was preferred by Transport for NSW (TfNSW)

and the then Roads and Maritime Services (RMS) in their written submissions and through consultation with TfNSW. Additional visual modelling has also been done, additional ground testing regarding potential archaeological impacts and an updated Biodiversity Development Assessment Report, due to changes in legislation and guidelines in the intervening period.

This RtS explains and analyses the revised proposal, summarises the changes, summarises the additional analysis/reports and outlines key environmental aspects of the proposal arising from the proposed changes. An updated list of mitigation measures is also provided.

## **1.2 Structure of this Report**

The structure of this report is outlined in the Table of Contents on Page 2. There are two components to the RtS: this summary document; and associated Appendices from varying experts, including plans of the revised proposal.

## **1.3 Supporting Documents**

The supporting documents are listed in the Appendices in the Table of Contents on Page 2, while a description of the subject matter, author and scope of these reports is in Part 4.3 of this RtS. Particular issues are also addressed of relevance to these reports in Part 6.1 of this RtS and throughout the report.

# **2 – Summary of Submissions**

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## **2.1 Public Authorities**

The following is a summary of the written submissions received in response to public exhibition of the development proposal. Further detail of the issues raised in those submissions and a response is in Part 5 of this RtS.

### 2.1.1 Federal Government

One submission received from Federal Department of the Environment and Energy. No specific objection raised.

### 2.1.2 NSW Government Authorities

- One submission from (then) NSW Office of Environment (Heritage), raising concerns regarding heritage impacts (and the proposed height) and the archaeological assessment, requesting further analysis;
- One submission from (then) NSW Office of Environment (Heritage), requesting additional analysis of matters relating to biodiversity impacts and recommended conditions of consent;
- One submission from Transport for NSW (TfNSW) raising a number of recommended actions and considerations, including revised access from Eels Place, and recommended conditions of consent;
- One submission from (then) Roads and Maritime Services (RMS) raising a number of advisory comments and considerations;

- One submission from Venues NSW, raising issues of concern related to access from the southern accessway on VNSW land and competition from function space;
- One submission from Water NSW, of advice (not objection); and
- One submission from the Environmental Protection Authority (EPA) of advice (not objection).

#### 2.1.3 Parramatta City Council

- One submission from Parramatta City Council raising various issues of concern, suggestions, considerations and recommended conditions of consent, if approved.

### **2.2 Utility Providers**

- Two submissions from Endeavour Energy and NSW Water, raising operational considerations and conditions to be complied with (not objection).

### **2.3 Community Organisations, Interest Groups and Elected Officials**

- Two submissions from National Trust (national and district branches) raising various concerns.
- One submission from the Federal member, passing on concerns raised by others.
- One submission was received from the "Better Planning Network" raising various concerns.

### **2.4 Public Submissions**

There were 76 submissions from the public from the public exhibition (excluding other submissions listed above).

One submission was in support and the remainder were in opposition.

Of the 75 objections from the public:

- 18 (24%) were in the adjoining suburbs of Parramatta, North Parramatta or Westmead;
- Many submissions were from suburbs far removed from the site, including Beecroft, Coogee, Lane Cove, Leichhardt and South Australia;
- 6 submissions (8%) did not provide a name or address and a further 52 (69%) did not provide a name.

It is apparent that a website had been established to help facilitate easy objection to the DA, by pro-forma objections. This is evident in a high number of pro-formas objecting to the proposal (39 or over 50%), while a number of other email submissions have similar content. There was some editing of the pro-forma submissions (the longer base sometimes being cut-back).

The pro-forma was also very similar to a longer written submission from a former convenor of "the Better Planning Network", with many phrases and sentences being common. While the Better Planning Network is a community organisation, their comments have been included in

public submissions to avoid duplication and, as stated, many of the issues raised by that organisation form the basis of public pro-forma or other submissions.

The one submission in support for the DA stated more hotel rooms are needed in Parramatta due to a shortage.

### 3 – Subsequent Consultation

The following table summarised consultation post-exhibition of the SSD with various authorities:

Agency	Date(s)	Feedback	Response
<b>Venues NSW</b>	Ongoing 2019-2021	Revise access; Consider future access to a building to south on NSW land; Coordinate with Event Planning; Need for owner's consent: being considered.	Access has been revised and relocated in line with Venues NSW and TfNSW/RMS preference; The Event Management Plan has been reviewed and all vehicular access during major events will be off Eels Place; Owner's consent from VNSW is no longer required.
<b>OEH (Heritage)</b>	May 2019	Undertake additional modelling; Maintain their written position to reduce the height of the hotel to be no higher than the adjoining Parramatta Stadium.	Additional visual modelling has been undertaken, including additional heritage and urban vistas; The height has been reduced by 6m/two floors; Revised additional modelling from 11 vistas have been undertaken (7 additional vistas from OGHD and 3 from the Norma Parker Centre to the north), as well as urban vistas, and proposal is essentially 100% within the tree-line; Further elaboration is in this RtS (Part 5 and 6.1.1) and in the Updated SoHVI at Appendix B.
<b>OEH (Arch'ology)</b>	Oct-Nov 2021	Offer to meet to discuss further digging, updated report and findings; No further feedback at time of this RtS.	An updated report and additional excavation have been undertaken as suggested in the OEH submission; Further elaboration is in this RtS (Part 6.1.4).
<b>TfNSW/RMS/ Parra Light Rail</b>	Dec 2018, 2019, Oct 2021, 12/11/21	Consider alternative access off Eels Place; Ensure turning circles are met; Revise intersection; Ensure coordination with VNSW during events;	Revised access arrangements are now off Eels Place, as desired; Turning circle analysis is provided with the revised plan and Traffic report; The intersection with O'Connell Street is no longer proposed;

Agency	Date(s)	Feedback	Response
		Consider traffic changes from Light Rail; Consider and address impacts on/from Light Rail during construction. Various issues of detail on draft updated report (email 12/11/21).	An event management plan has been coordinated with the plan from VNSW; Parramatta Light Rail has been considered and addressed with the updated traffic report by TTPP, including during construction; The updated traffic report has been revised in response to feedback in November 2021 on a prior draft provided to TfNSW. More detail is in the Traffic and Parking report contained at Appendix E (Table 3.4, pg. 38).
<b>Parramatta Council</b>	Mid-2021, Nov 2021	Offer to meet to discuss issues and brief. Council staff happy to rely on submission made with exhibition and await RtS prior to further feedback.	Responses in this submission. The applicant will continue to engage with Council as issues arise, and offer briefings at key stages.

**Table 1** – Post Lodgement Consultation (pre-RtS)

## 4 – Amendments to the Proposal

### 4.1 Description of Revised Proposal

#### (a) Clean Description of Revised Proposal

The proposal involves the demolition of existing improvements/groundworks and erection of a 15-storey hotel building (plus a single level basement for services and ancillary space) accommodating 190 rooms including the lower 3 levels which contain a café, fitness/recreational uses and a function room ancillary to the hotel. Vehicular access is proposed from Eels Place to the west of the building, and the proposal includes public domain works and services connections/upgrades surrounding the building to integrate the building with the surrounding area and infrastructure.

No additional parking is proposed, with parking to be accommodated in the adjoining large carpark, which provides parking for 773 cars, disabled parking and bicycle parking. Loading is proposed to the north of the building, at ground level and diagonally opposite the existing Parramatta Leagues Club loading area.

The proposal is depicted within the revised plans by Hassell Architects (Appendix A).

#### (b) Track Change Comparison with Original DA

The proposal involves the demolition of existing improvements and erection of a **15** ~~17~~ storey hotel building (plus a single level basement **for services and ancillary space**) accommodating **190** ~~209~~ rooms ~~and~~ including the lower **3** ~~4~~ levels which contain a café, ~~pool~~,



fitness/recreational uses and a function room ancillary to the hotel. Vehicular access is proposed from **Eels Place** ~~O'Connell Street~~ to the **west south** of the building ~~(via an access road to/from the adjoining Parramatta Stadium)~~, and the proposal includes public domain works and services connections/upgrades surrounding the building to integrate the building with the surrounding area and infrastructure.

No additional parking is proposed, with parking to be accommodated in the adjoining large carpark, which provides parking for 773 cars, disabled parking and bicycle parking. Loading is proposed to the north of the building, at ground level and diagonally opposite the existing Parramatta Leagues Club loading area.

The proposal is depicted within the plans by Hassell **Architects (Appendix A)**.

#### **4.2 List of Changes Since Exhibition**

The following summarises the changes to the proposal included in this Response to Submissions (RtS):

##### General

- Reduction of building height by 2 floors
  - o Reduction of 1x floor from tower
  - o Reduction of 1x floor from podium
- Reduction of building height by 6m overall
- Remove swimming pool / aquatic functions
- Relocation of gym to ground and 1<sup>st</sup> floors

##### Site/Access

- Relocate vehicular access to and from Eels Place to the west of the building, with no access from the adjoining stadium site to the south, with associated changes to the ground level public domain

##### Basement:

- Basement area reduced
- End of trip male and female change/toilet areas
- Increased deep soil zone
- Excavation reduced with removal of pool

##### Ground Level

- Pool removed and aquatic function removed
- Replan of change-room and amenities for gym
- Main gym area moved to ground level
- Resolution of access road width and circulation strategy

##### Level 01 / Gym Mezzanine

- Gym mezzanine and group fitness spaces relocated from 2<sup>nd</sup> floor to 1<sup>st</sup> floor (with removal of 1x floor from podium)
- Replan of gym change-rooms / amenities

Level 02 / Function Rooms

- Function and meeting room uses relocated from 3<sup>rd</sup> floor to 2<sup>nd</sup> floor (with removal of 1x floor from podium)
- Front of house ("FOH") circulation stair added to provide connection to floor above to allow circulation via bridge connection to existing adjoining Club

Level 03 / Central Plant Floor

- Central plant uses relocated from 4<sup>th</sup> floor to 3<sup>rd</sup> floor (with removal of 1x floor from podium)
- North plant room reconfigured to accommodate bridge connection to existing club
- FOH circulation stair added to provide connection to floor below to allow circulation via bridge connection to existing club
- FOH circulation stair added to provide connection to podium roof top garden space 1 floor above

Level 04 / Podium roof top garden

- Top of podium roof garden and associated amenities lowered 1 level (with removal of 1x floor from podium)
- FOH circulation stair added to provide connection to floor below function spaces
- FOH circulation stair added to provide connection to floor below to allow circulation via bridge connection to existing club

Level 05 – 12 / Hotel Rooms

- 1 floor of rooms removed from tower

Level 14 (formally level 16)

- Lowered 2 levels with removal of 1 floor from podium and 1 floor from tower
- Meeting rooms replaced with hotel suites

These changes result in a reduced Gross Floor Area to 11,560sqm (a reduction of 2,114sqm, or 15.5%), including a reduction in rooms from 209 rooms to 190 rooms, and a reduction in storeys from 17 to 15.

A revised summary schedule of area is provided below:

# Response to Submissions (RtS) – Parramatta Leagues Club Hotel

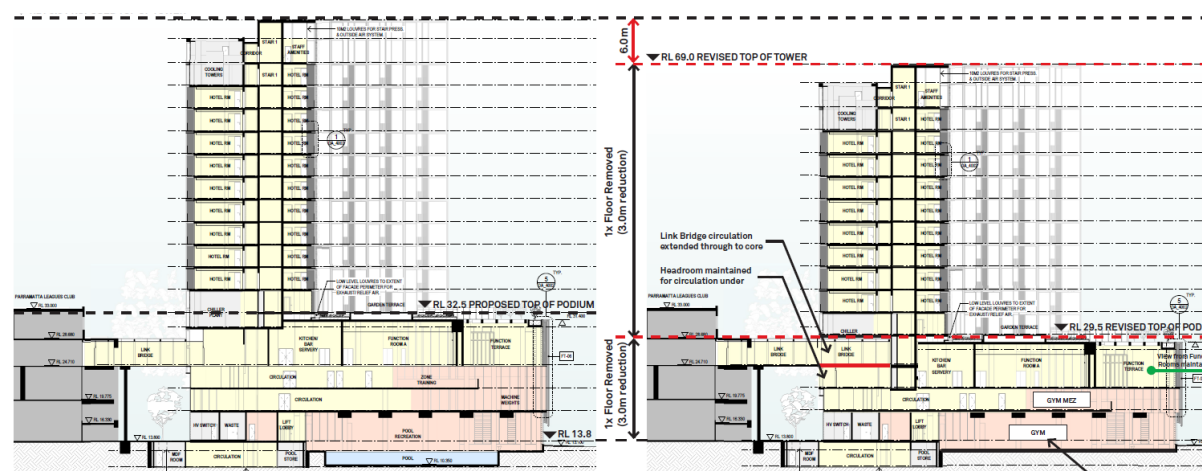
Main Building - Originally Submitted Scheme			
Level	Description	GFA	Hotel Keys
16	Conference Facility, Terrace Bar, Plant	857m <sup>2</sup>	
15	Hotel, Plant	545m <sup>2</sup>	
14	Hotel	709m <sup>2</sup>	15
13	Hotel	709m <sup>2</sup>	21
12	Hotel	709m <sup>2</sup>	21
11	Hotel	709m <sup>2</sup>	21
10	Hotel	709m <sup>2</sup>	21
9	Hotel	709m <sup>2</sup>	21
8	Hotel	709m <sup>2</sup>	21
7	Hotel	709m <sup>2</sup>	21
6	Hotel	709m <sup>2</sup>	21
5	Hotel, Plant	305m <sup>2</sup>	5
4	Plant	-	
3	Function Centre, Link Bridge	1,504m <sup>2</sup>	
2	Fitness and Wellness Centre	1,225m <sup>2</sup>	
1	Fitness and Wellness Centre	1,473m <sup>2</sup>	
UG	Cafe, Loading Dock, Entry Lobby	514m <sup>2</sup>	
LG	Pool Recreation, Entry Lobby	838m <sup>2</sup>	
B1	EOT, Storage, Plant	234m <sup>2</sup>	
TOTAL		13,674m <sup>2</sup>	209

Main Building - Revised Scheme (Response to Submissions)			
Level	Description	GFA	Hotel Keys
16	-		
15	-		
14	Hotel, Terrace Bar, Plant	857m <sup>2</sup>	2
13	Hotel, Plant	545m <sup>2</sup>	15
12	Hotel	709m <sup>2</sup>	21
11	Hotel	709m <sup>2</sup>	21
10	Hotel	709m <sup>2</sup>	21
9	Hotel	709m <sup>2</sup>	21
8	Hotel	709m <sup>2</sup>	21
7	Hotel	709m <sup>2</sup>	21
6	Hotel	709m <sup>2</sup>	21
5	Hotel	709m <sup>2</sup>	21
4	Hotel, Plant	305m <sup>2</sup>	5
3	Plant, Link Bridge	90m <sup>2</sup>	
2	Function Centre	1,480m <sup>2</sup>	
1	Fitness and Wellness Centre	1,225m <sup>2</sup>	
UG	Cafe, Loading Dock, Entry Lobby	514m <sup>2</sup>	
LG	Fitness and Wellness Centre, Entry Lobby	838m <sup>2</sup>	
B1	EOT, Storage, Plant	234m <sup>2</sup>	
TOTAL		11,560m <sup>2</sup>	190

**Figure 1 – GFA and Accommodation Schedule (Original and Revised) – Hassell**

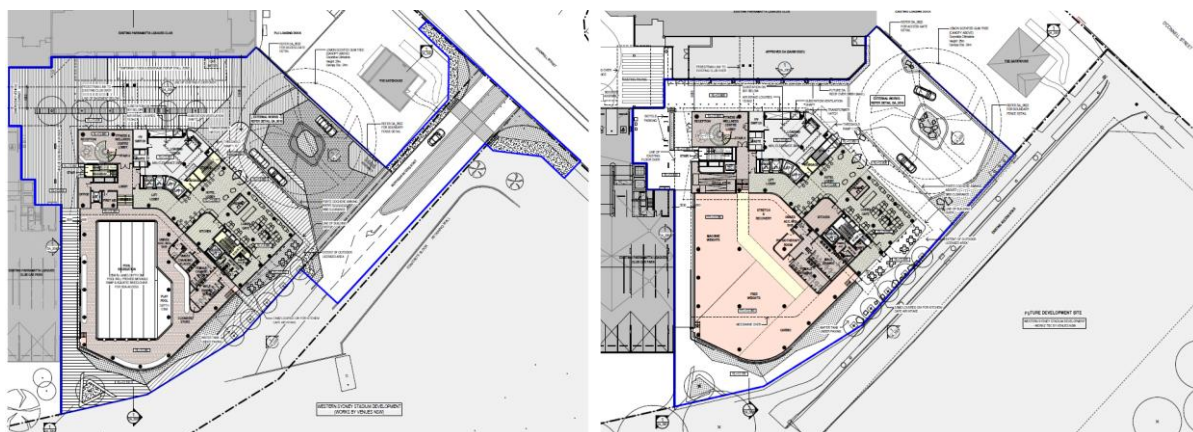
The main two changes to the proposal relate to the reduction by 6m (two levels) and change to the vehicular access to be from Eels Place to the west, rather than O’Connell Street to the south, via Venues NSW’s land.

The change in the building height is illustrated below:



**Figure 2 – Height Reduction (Original DA, left and current as revised, right, by Hassell)**

The change in vehicular access to/from the site is illustrated below:



**Figure 3** – Ground Floor and Access (Original DA, left and current as revised, right, by Hassell)

The change in access no longer involves any works to VNSW land (i.e. part of the adjoining Stadium site), to the south. There is also some change to the ground floor access arising from the recent DA approval of a ground floor extension to the adjoining Parramatta Leagues Club Building (DA 681/2021, approved by Parramatta City Council), to the immediate north of the proposed hotel building. This has not yet been constructed, although is shown on plans on the basis it is intended to be built, and is approved.

Another change is the pool at ground floor has been replaced by a gymnasium, in part to reduce plant requirements and height, and also to reduce costs due to the reduction in rooms and overall viability. This has also been aided by a relocated public pool being secured in Parramatta by the Council and the State (although noting the proposed pool was not a publicly-managed pool). The proposed gymnasium allows a former mezzanine level to be deleted and to retain the active interface with the surrounding public domain (potentially improved due to reduced operational privacy associated with pools potentially affecting glazing in the longer term).

#### 4.3 Overview of Updated Supporting Reports

The following table lists the supporting plans and reports, including a summary of the scope and authors.

Appendix	Subject Matter and Author	Summary Scope
A	Plans, Vistas and Montages (by Hassell)	<ul style="list-style-type: none"> <li>Revised Plans and details, including changes to the proposal;</li> <li>Revised access and ground floor planning/landscaping;</li> <li>Revised overshadowing plans;</li> <li>Updated visual analysis, including additional urban and heritage vistas, reduced building height and showing potential height under the current Local Environmental Plan ("LEP")</li> </ul>

Appendix	Subject Matter and Author	Summary Scope
		<p>and proposed draft CBD Planning Proposal, which is well-advanced.</p> <ul style="list-style-type: none"> <li>• Montages.</li> </ul>
B	Revised Statement of Heritage and Visual Impact (by Purcell)	<ul style="list-style-type: none"> <li>• Updated heritage assessment, including additional heritage vistas from Old Government House Domain ("OGHD") and Parramatta North Heritage Sites;</li> <li>• Address issues raised by (then) NSW Office of Environment and Heritage (OEH), and by Parramatta City Council;</li> <li>• Updated consideration and conclusions, including from the revised reduced building height.</li> </ul>
C	Revised Biodiversity Development Assessment Report (by Cumberland Ecology)	<ul style="list-style-type: none"> <li>• Updated assessment to address issues raised by (then) NSW OEH and Council;</li> <li>• Changes in clean and track changes;</li> <li>• Also includes a summary of changes in response to issues raised by OEH and Council (separate letter);</li> <li>• Updated to latest BDAR requirements;</li> <li>• Additional sections on mitigation measures and a management regime.</li> </ul>
D	Updated Archaeological Report (by Austral Archaeology)	<ul style="list-style-type: none"> <li>• Updated assessment to address issues raised by (then) NSW OEH;</li> <li>• Additional ground testing and results;</li> <li>• Updated conclusions in light of additional ground testing.</li> </ul>
E	Updated Traffic and Parking Assessment Report and associated Plans (by TTPP)	<ul style="list-style-type: none"> <li>• Assessment, including a comprehensive assessment of the traffic and parking impacts associated with the revised access and revised (reduced) proposal;</li> <li>• Address issues raised by TfNSW, former RMS and Council;</li> <li>• Associated turning circle analysis;</li> <li>• Provide a Preliminary Loading Management Plan;</li> <li>• Provide an Event Management Plan, including after considering Operational Management Plan of the adjoining Stadium;</li> <li>• Updated analysis and conclusions.</li> </ul>

Appendix	Subject Matter and Author	Summary Scope
F	Updated Sustainability Report (by JHA)	<ul style="list-style-type: none"> <li>Updated report to consider and address issues raised by DPIE and Council;</li> <li>Commitment to 5-star Green Star rating.</li> </ul>
G	Updated Flooding and Stormwater Report (TTW)	<ul style="list-style-type: none"> <li>Updated assessment to address issues raised by Council related to flooding and stormwater.</li> </ul>

**Table 2** – Supporting Documents and Summary Scope

## 5 Response to Submissions

The following pages summarise the response to submissions made during the public notification of the SSDA, grouped by:

- Public Authorities
- Utilities
- Community Organisations, Interest Groups and Elected Representatives
- Public

This is presented in tabular form, with a name to issues raised, a summary of issues raised, a summary response and reference to further information within supporting reports or this RtS.

A table is also provided, responding to the issues in DPIE's letter of 1 April 2019. Again, this is a summary, with further elaboration provided in this RtS and supporting reports and plans.

As outlined earlier, subsequent discussion/consultation after the written submissions from public exhibition has been separately outlined and summarised in the previous Section 3 of this RtS.

### 5.1 Public Authorities

Issue Name	Summary of Issues Raised	Response	Reference to Other Parts or Documents
<b>Federal (Department of the Environment and Energy)</b>			
Heritage (National)	<i>We note that the proposal is in the vicinity of both the Old Government House and Domain (OGHD; National and World Heritage listed), and the Parramatta Female Factory and Institutions Precinct (National Heritage</i>	<ul style="list-style-type: none"> <li>• Noted</li> <li>• The submission can be read as acknowledgement and acceptance of the methodology used to assess impacts on the Federal heritage listing of OGHD in the</li> </ul>	RtS Appendix A (plans and visual analysis) RtS SoHVI (Appendix B) RtS Section 6.1

Response to Submissions (RtS) – Parramatta Leagues Club Hotel

Issue Name	Summary of Issues Raised	Response	Reference to Other Parts or Documents
	<i>listed). The proponent and heritage consultants have been in contact with the Department regarding their heritage impact assessment and consistency with planning controls enshrined in the OGHD Conservation Agreement. We understand that the proponent is aware of their responsibilities under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act) and any obligation to refer, should the proposal have likely significant impacts on any matters protected under the EPBC Act. At this stage, we have no further comments</i>	<p>Statement of Heritage and Visual Impact Assessment by Purcell.</p> <ul style="list-style-type: none"> <li>The proposal has been revised to further reduce the building height and potential impacts on OGHD and North Parramatta Historic sites.</li> <li>The original and updated Statement of Heritage and Visual Impact (Purcell) concludes the proposal will not require an approval under the Environment Protection and Biodiversity Conservation Act, 1999.</li> </ul>	
<b>NSW State</b>			
<b>Office of Environment and Heritage (Heritage)</b>			
Visual Impacts and Height	<i>The height of the tower is visually dominant and would introduce a prominent new feature to the skyline of North Parramatta if it proceeds in its current form. The height and scale of the proposal will significantly alter the character and skyline of this significant heritage precinct. It will have direct visual impacts on the above-mentioned items of State, National and World</i>	<ul style="list-style-type: none"> <li>It is noted that views to the Hills District are not included within the views of the Highly Sensitive Zone which incorporates the subject site (Technical Guide, p.90). Notwithstanding this, Views 6, 9 and 16, all views of Moderate Significance, were modelled through the assessment process.</li> <li>The modelling of the reduced height form is contained within the updated SoHVI by Purcell which concludes that the proposal will not</li> </ul>	<p>RtS Appendix A (plans and visual analysis)</p> <p>RtS SoHVI (Appendix B)</p> <p>RtS Section 6.1</p>



Issue Name	Summary of Issues Raised	Response	Reference to Other Parts or Documents
	<p><i>Heritage significance. The proposal would interrupt views from the ridgeline and Crescent in Parramatta Park to the Hills District.</i></p> <p><i>The Statement of Heritage and Visual Impact (SHaVI) prepared by Purcell (November 2018) concludes that the proposal does not present a significant impact on the views to, from and between the adjacent significant heritage items, nor that it has no significant impact on their heritage values. The Heritage Council does not agree with the conclusions of the proponent's assessment. We recommend that this assessment be peer reviewed by an independent heritage expert.</i></p> <p><i>Following the National Heritage Listing of the 'Parramatta Female Factory and Institutions Precinct' in 2017, the Heritage Council understands that proposed UrbanGrowth NSW towers referred to in the SHaVI will not proceed and therefore should not have been included within the SHaVI.</i></p> <p><i>The Heritage Council has consistently expressed concerns about the impact of</i></p>	<p>significantly alter the character and skyline of the heritage precinct.</p> <ul style="list-style-type: none"> <li>• The summary views analysis in the updated SoHVI provides an overview of the views relevant to the Highly Sensitive Zone, those requested by OEH to further illustrate the proposal, and their relative significance and visibility of the proposal.</li> <li>• An independent peer review has been commissioned and will be submitted when complete.</li> <li>• In terms of the second issue, the previous and dated announcements by the NSW Government only appear to relate to the "Historic Core", not the blocks to the east of the North Parramatta Historic sites, which are to the north of the subject site. There is no Planning Proposal to amend the former "urban growth towers" outside the heritage core and the current LEP Height limits continue to apply. Any potential change to controls cannot be considered imminent or certain and is not known to be contemplated. The Council's City Centre Planning Proposal does not apply to these sites to the north of the site, although does include changes and potential FSR and height bonuses two blocks to the east of the site, along</li> </ul>	

Issue Name	Summary of Issues Raised	Response	Reference to Other Parts or Documents
	<p><i>developments within the Highly Sensitive Area and World Heritage Buffer Zone for Old Government House and Domain. The Heritage Council has also previously advised Parramatta City Council against increasing the heights and floor space ratio in the vicinity of the Old Government House and Domain due to the impacts of high-rise development on the World, National and State heritage values.</i></p> <p><i>For these reasons the Heritage Council recommends that the high-rise tower component of the current proposal be limited to a maximum height equal to the adjacent new Western Sydney Stadium. The stadium already represents an adverse incursion into the character of the skyline of this significant heritage precinct. Given the stadium is already extant, it is recommended that this new development be limited in height to minimise additional adverse heritage impacts and to integrate the proposed new building with the surrounding area.</i></p>	<p>Marsden Street. This is further expanded upon in Part 6.1 of this RtS.</p> <ul style="list-style-type: none"> <li>• Reference to the UrbanGrowth NSW towers has been removed with reference updated to reflect the current Parramatta LEP 2011 height limits.</li> <li>• Reference to the relevant Planning Instruments confirms that the subject site does not have any height of floor space ratio controls. However, there are detailed height controls in the Parramatta DCP 2011, also referred to in the Conservation Agreement for OGHD, which the proposal fully complies with.</li> <li>• The overall height of the proposal has been reduced by 6 metres. This measure ensures that the height of the tower sits 95-100% within the overall tree canopy, exceeding the 80% height control set out within the DCP and Conservation Agreement for the OGHD. The height reduction ensures that the proposal is not essentially visible from those key views 2 and 5 of the DCP Figure 4.3.3.7.7, otherwise referenced as views 3 and 10 within the Technical Guide (Planisphere, 2012).</li> <li>• There is no requirement under the planning instruments or controls to support the Heritage Council's opinion to reduce the height. No</li> </ul>	

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Issue Name	Summary of Issues Raised	Response	Reference to Other Parts or Documents
		<p>modelling is provided by OEH to support the recommended reduction in height and no reference is made to any specific planning controls.</p> <ul style="list-style-type: none"> <li>The proposal does not breach a height limit in any LEP or DCP. Indeed, the site-specific height limit imposed by Parramatta DCP 2011 and by the Conservation Agreement for the OGHD site is fully complied with, and the building is well below the height which is permissible under the two key vistas to the site.</li> </ul>	
<b>Office of Environment and Heritage (Archaeology)</b>			
Further Archaeological Testing Needed	<p>The testing to inform the EIS cannot demonstrate archaeological resources of State Significance would not be impacted.</p> <p>Further testing should occur/the SEARs required certain site-specific requirements, which have not been satisfied.</p> <p>An updated archaeological assessment should be undertaken after further testing, including appropriate future management.</p>	<ul style="list-style-type: none"> <li>Previous archaeological testing did occur, as outlined in the Archaeological Assessment forming part of the EIS. The former OEH did request additional testing regarding a possible early footing associated with the former gatehouse, as identified in the original archaeological assessment by Austral Archaeology.</li> <li>While the chances of such remains were deemed very low, and despite considerable expense, further testing has been undertaken. This is outlined in the updated archaeological report by Austral at Appendix D.</li> </ul>	<p>RtS Updated Archaeology report (Appendix D)</p> <p>RtS Section 6.1</p>

Issue Name	Summary of Issues Raised	Response	Reference to Other Parts or Documents
		<ul style="list-style-type: none"> <li>The further testing has confirmed no evidence of archaeological remains.</li> </ul>	
<b>Office of Environment and Heritage (Biodiversity)</b>			
Additional Analysis and Information is needed	The BDAR should be amended to address various potential impacts on the Grey Headed Flying Fox (GHFF) Colony to the west, in Parramatta Park, during construction.	<ul style="list-style-type: none"> <li>These issues have been considered and addressed in an updated Biodiversity Development Assessment Report ("BDAR") by Cumberland Ecology (clean and mark-up, as requested).</li> </ul>	RtS Updated BDAR Report (Appendix C)
Mitigation and Conditions are Appropriate	<p>Need to address operational and construction noise on GHFF colony.</p> <p>Further detail of mitigation measures is needed.</p> <p>An Adaptive Management Strategy would have been appropriate.</p> <p>Additional mitigation measures recommended. Recommends a condition on DA approval relating to an ecologist being present; monitoring; adaptive management; stop work orders; management of impacts; nesting boxes and other details relating to conditions of approval;</p> <p>Support for green roofs;</p> <p>Notes no hollow-bearing trees are to be removed, supports the proposed additional 11 mature trees (8m-15m in</p>	<ul style="list-style-type: none"> <li>The updated report includes managing operational and construction impacts.</li> <li>The updated report includes proposed mitigation measures regarding replacement planting, dust management, noise management, light spill management, bird collision management, Grey-Headed Flying Fox ("GHFF") monitoring, adaptive management strategies, stop work triggers, habitat improvement and other matters.</li> <li>Mitigation measures are addressed and are able to be addressed by conditions of consent including adopting the findings, recommendations and strategies outlined in the updated report by Cumberland Ecology.</li> <li>An adaptive Management Strategy has been provided in the updated ecological report, as requested.</li> </ul>	RtS Updated BDAR Report (Appendix C)

Response to Submissions (RtS) – Parramatta Leagues Club Hotel

Issue Name	Summary of Issues Raised	Response	Reference to Other Parts or Documents
	height) and encourages greater soft landscaping at the ground level if possible	<ul style="list-style-type: none"> <li>None of the recommended conditions are problematic.</li> <li>The updated report also addresses issues raised by Council regarding lighting and potential collisions of birds.</li> </ul>	
<b>Transport for NSW</b>			
Process and Consultation	Not enough time to respond to previous consultation prior to DA lodgement - RtS should consider prior consultation;	<ul style="list-style-type: none"> <li>Consultation has occurred and feedback has been considered.</li> </ul>	RtS Updated Traffic and Parking Assessment (Appendix E), RtS Section 3
Access Point	<p>Legal rights to use the Stadium northern access road from VNSW should be clarified, including if owner's consent has been obtained and if it is to be dedicated as a public road, and the future timing of the building on the Stadium site;</p> <p>Alternate access is available from Eels Place which should be further investigated by the applicant.</p>	<ul style="list-style-type: none"> <li>It is accepted owner's consent from VNSW was needed (although is no longer needed due to changed access).</li> <li>However, as preferred by both TfNSW and the former RMS, all access is now from Eels Place, and no access from Venues NSW's land, nor works to their land, are proposed.</li> </ul>	RtS Updated Traffic and Parking Assessment (Appendix E), RtS Section 6.1
Additional Details Required	<p>The Transport and Accessibility Impact Assessment should include swept path analysis from Eels Place;</p> <p>Any approved Event Management Plan prepared for the operation of the</p>	<ul style="list-style-type: none"> <li>An updated traffic and parking assessment and turning circles have been done by TTPP, as contained in Appendix E. Existing access from Eels Place to the Parramatta Leagues Club and carpark is not altered. The plans have also</li> </ul>	RtS Appendix A (updated plans) RtS Updated Traffic and Parking

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Issue Name	Summary of Issues Raised	Response	Reference to Other Parts or Documents
	<p>Western Sydney Stadium events should be reviewed as part of the Hotel development to ensure that any additional measures required to operate the Hotel during events are incorporated. The review should be undertaken in consultation with Venues NSW, Parramatta City Council and SCO and should include mitigation measures for impact on Eels Place and the new access road during all events (prior to Occupation Certificate);</p> <p>the Transport and Accessibility Impact Assessment should include details of the traffic analysis undertaken for the Parramatta Light Rail (PLR) project in consultation with the PLR team;</p> <p>Projected freight and servicing movements (number and type by day) should be analysed and options for managing loading spaces for the hotel and league club collectively considered.</p>	<p>been updated to account for a recent DA approval for a ground floor addition to the Club building.</p> <ul style="list-style-type: none"> <li>• The approved operational plan for the Stadium site has been reviewed. A condition regarding further liaison and detail prior to Occupation would be appropriate. It is acknowledged and accepted there would be restrictions on the access to the hotel on event days. This is further addressed in the attached revised Traffic and Parking Assessment.</li> <li>• TTPP have updated their report to address the Parramatta Light Rail (PLR), following consultation with TfNSW staff.</li> <li>• Co-location of loading facilities is not possible due to access and spatial constraints. Loading for the Parramatta Leagues Club will remain unchanged. The loading for the hotel is in the most appropriate location.</li> <li>• A Loading Management Plan has been provided by TTPP as part of their revised report.</li> </ul>	<p>Assessment (Appendix E), RtS Section 6.1</p>
Signal Phasing (Traffic Lights)	<p>Any proposed signal phasing adjustments would be subject to RMS approval.</p>	<ul style="list-style-type: none"> <li>• It is acknowledged that TfNSW has control of signal phasing.</li> </ul>	<p>RtS Updated Traffic and Parking Assessment (Appendix E)</p>

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Issue Name	Summary of Issues Raised	Response	Reference to Other Parts or Documents
Construction Management	A Construction Pedestrian and Traffic Management Plan (CPTMP) should be a condition of consent, with consultation (with the Sydney Coordination Office, SCO), approval and details outlined.	<ul style="list-style-type: none"> <li>No objection is raised to a CPTMP as a condition of consent. This would be sensible, including consultation with both State and local authorities.</li> </ul>	NA
<b>Roads and Maritime Services</b>			
Access Point	Preference for access to the hotel porte-cochere and loading area from Eels Place, not the northern access road.	<ul style="list-style-type: none"> <li>As preferred by both TfNSW and the former RMS, all access is from Eels Place, and no access from VNSW land, nor works to their land, is proposed.</li> </ul>	RtS Revised Plans (Appendix A) RtS Updated Traffic and Parking Assessment (Appendix E), RtS Part 6.1
Manoeuvrability	Concerns about turning circles and safety for the proposed southern access from VNSW access road, especially for 12.5m trucks in opposite directions; Access and manoeuvrability are constrained in a busy area, and this should egress should occur in a forward direction.	<ul style="list-style-type: none"> <li>Turning circle plans are provided for the various range of vehicle types that use the accessway, which is not a public road. Appropriate treatment of the accessway is proposed, which has limited use for vehicles (noting all cars and taxis use the carpark and buses/coaches use Eels Place), as detailed in the updated Traffic and Parking Assessment by TTPP.</li> </ul>	RtS Updated Traffic and Parking Assessment (Appendix E), RtS Part 6.1
Event Planning	An Event Plan of Management will be needed.	<ul style="list-style-type: none"> <li>An Event Plan of Management is provided, designed to complement the Event Plan for the adjoining Stadium, as detailed in the updated Traffic and Parking Assessment by TTPP.</li> </ul>	RtS Updated Traffic and Parking Assessment (Appendix E)

Response to Submissions (RtS) – Parramatta Leagues Club Hotel

Issue Name	Summary of Issues Raised	Response	Reference to Other Parts or Documents
Construction Management	A Construction Pedestrian and Traffic Management Plan (CPTMP) should be a condition of consent, considering timing and impacts relative to the PLR project.	<ul style="list-style-type: none"> <li>No objection is raised to a CPTMP as a condition of consent. This would be sensible, including consultation with both State and local authorities.</li> </ul>	NA
<b>Venues NSW</b>			
Consultation	Recommend consultation with the Stadium Venue Operator.	<ul style="list-style-type: none"> <li>Consultation with VNSW did occur over an extended period, including obtaining the Event Management Plan for the adjoining Stadium and ensuring operational matters are addressed and aligned.</li> <li>The Parramatta Leagues Club has an open and positive working relationship with the Stadium Operator.</li> </ul>	RtS Part 3
Access Point	Given the number of Events at the adjoining Stadium, all access should be from Eels Place.	<ul style="list-style-type: none"> <li>Access has been revised and altered to be to and from Eels Place, as preferred.</li> </ul>	RtS Revised Plans (Appendix A) RtS Updated Traffic and Parking Assessment (Appendix E)
Function Space	The function space may compete with the function space in the adjoining Stadium. Duplication should be avoided.	<ul style="list-style-type: none"> <li>The hotel will be an asset and will complement the use of the adjoining Stadium. It is agreed duplication of function facilities should be avoided (and has been by a different offer and setting) and the Club will continue its discussions with VNSW. The nature of the conferencing facilities within a hotel and a Stadium are</li> </ul>	NA



Response to Submissions (RtS) – Parramatta Leagues Club Hotel

Issue Name	Summary of Issues Raised	Response	Reference to Other Parts or Documents
		different. The wider ability to attract functions to the precinct and park precinct is positive. Apart from this, any direct commercial competition considerations are not relevant, albeit not envisaged.	
Impacts from Stadium	There will be traffic, noise and disruption impacts from the Stadium upon the use and this should be acknowledged.	<ul style="list-style-type: none"> <li>Acoustic impacts from the Stadium have been considered. Part of the attraction of the hotel will be its proximity to the Stadium, park and events, especially where larger and popular events are proposed at the Stadium. Information regarding events will be available on the hotel website and will be made known when bookings are made.</li> </ul>	EIS Attachment Q
<b>Water NSW</b>			
Lack of Impact	The subject site will not impact on any Water NSW land, assets or infrastructure, and therefore no comment or requirements are raised.	<ul style="list-style-type: none"> <li>Noted</li> </ul>	NA
<b>Environmental Protection Authority</b>			
No approval needed	The proposal does not constitute a scheduled activity under the POEO Act 1997 and no comment is provided.	<ul style="list-style-type: none"> <li>Noted</li> </ul>	NA
<b>Local Council (Parramatta City Council)</b>			

Response to Submissions (RtS) – Parramatta Leagues Club Hotel

Issue Name	Summary of Issues Raised	Response	Reference to Other Parts or Documents
Extend Exhibition	An extension of the exhibition period should be given.	<ul style="list-style-type: none"> <li>The consultation period was extended by DPIE and Parramatta Leagues Club supported this decision.</li> </ul>	DPIE decision supported request
Height, Bulk and Scale	<p>Despite the Design Excellence Review Panel support, concerns are held regarding the height, scale and bulk from a planning perspective.</p> <p>The building is higher than surrounding heights in the LEP and City Centre Planning Proposal (PP) and will have a dominant place in O'Connell Street and the Park.</p> <p>Inappropriate height and scale given adjoining LEP height limits, which should inform the proposal.</p> <p>Trees may ameliorate some impacts but given the potential heritage impacts on OGHD and the Female Factory proposal should meet all controls in Area A1 of Parramatta DCP 2011.</p>	<ul style="list-style-type: none"> <li>The Design Excellence Panel was supportive of the proposal, and this included consideration of the proposed bulk, scale and height, which has now been reduced by two storeys.</li> <li>The building is higher than buildings and planning controls to the immediate east and north, but comparable (and lower) to LEP height limits to the north-west and a further block north. The bulk, scale and height has been reduced and is contextually appropriate (whether or not future development occurs). This is further addressed in Part 6.1 of this report.</li> <li>The surrounding controls to the north and the City Centre Planning Proposal have been considered. This wider planning context is appropriate rather than just across O'Connell Street, given the building is well set back from O'Connell Street, is between large buildings to the north and south, and the height in relation to vistas from OGHD to the south and west is seen in a wider context, given views are 400-800m away. There is additional and updated visual modelling as contained in the RtS attached plans and visual modelling. This has</li> </ul>	<p>EIS</p> <p>RtS Revised Plans (Appendix A)</p> <p>RtS Updated SoHVI (Appendix B)</p> <p>RtS Part 6.1</p>

Response to Submissions (RtS) – Parramatta Leagues Club Hotel

Issue Name	Summary of Issues Raised	Response	Reference to Other Parts or Documents
		<p>included additional urban and heritage vistas since the EIS, as further addressed in Part 6.1 of this RtS.</p> <ul style="list-style-type: none"> <li>The proposal meets all of the controls in Area A1 of PDC 2011, as further detailed in as detailed in the updated Traffic and Parking Assessment by TTPP.</li> </ul>	
Consider Parramatta North Changes	Potential changes to the North Parramatta Urban Transformation Area to the north means the proposal should be reviewed (including by University of Sydney).	<ul style="list-style-type: none"> <li>The earlier-announced potential changes and Sydney University involvement was over 2 years ago, and has not led to changes to the LEP height limits. In any event, it is understood this related primarily to the heritage core to the north-west. No recent information of intentions has been able to be located.</li> </ul>	<p>RtS Revised Plans (Appendix A)</p> <p>RtS Updated SoHVI (Appendix B)</p> <p>RtS Part 6.1</p>
Developer Contributions	No discount to a required Contribution to Council should be given.	<ul style="list-style-type: none"> <li>No objection is raised to a valid contribution Section 7.11 being levied. The EIS merely pointed to some benefits of the proposal in deciding whether this levy is imposed and no reduction was specifically sought. As stated in the EIS (pg. 74) "...This would be expected to be applied through a condition of consent, if approval was granted".</li> </ul>	EIS Pg. 74
Public Domain	The public domain should be reconsidered to emphasise Little Coogee walk and trees incorporated	<ul style="list-style-type: none"> <li>The public domain is significantly improved and "Little Coogee walk" is significantly improved, being activated and reinforced by the proposal. However, access is now off Eels</li> </ul>	RtS Revised Plans (Appendix A)

Response to Submissions (RtS) – Parramatta Leagues Club Hotel

Issue Name	Summary of Issues Raised	Response	Reference to Other Parts or Documents
	<p>along O'Connell Street and along the access road/gatehouse.</p> <p>Soft landscaping and illumination between the building and carpark should be considered.</p>	<p>Place, as preferred by TfNSW and former RMS, and as no owner's consent from VNSW was secured. So, planting and treatment on VNSW land is a matter for that authority and Council.</p> <ul style="list-style-type: none"> <li>The O'Connell Street frontage is beyond the site boundaries and is owned by TfNSW and Parramatta Park Trust. If agreed by TfNSW, trees could be planted along O'Connell Street to Eels Place.</li> </ul>	
Design Review	The Design Excellence Panel (including City Architect) should review the proposal at key stages – a DA condition is recommended.	<ul style="list-style-type: none"> <li>It is not uncommon for a DEP to review proposals as key stages, and no in-principle objection to a reasonable condition routinely applied would be raised.</li> </ul>	EIS Appendix E1, E2
Traffic and Transport	<p>The pedestrian crossing at the southern access (north of Stadium site) does not meet Austrian Standards nor follow desire lines.</p> <p>A 3m bicycle path should be provided along O'Connell Street.</p> <p>A Green Travel Plan is supported and should be reviewed/ensured by conditions of consent.</p> <p>Bicycle parking for staff and change/locker facilities should be provided.</p>	<ul style="list-style-type: none"> <li>The crossing to the south on VNSW land is no longer proposed, so that issue no longer exists.</li> <li>The O'Connell Street frontage is beyond the site boundaries and is owned by TfNSW and Parramatta Park Trust.</li> <li>A Green Travel Plan is proposed and Council's support is noted.</li> <li>Bicycle parking and end-of-trip facilities for staff are provided and included in the updated revised plans. This is in addition to ample bicycle parking in the adjoining recent 4-7 storey carpark.</li> </ul>	<p>RtS Revised Plans (Appendix A)</p> <p>RtS Updated Traffic and Parking Assessment (Appendix E)</p> <p>RtS Part 6.1</p>

Response to Submissions (RtS) – Parramatta Leagues Club Hotel

Issue Name	Summary of Issues Raised	Response	Reference to Other Parts or Documents
	Council should review a Construction Management Plan as a DA condition.	<ul style="list-style-type: none"> <li>No objection to a Construction Management Plan and Council consultation is raised.</li> </ul>	
Protect Assets	The O'Connell Street footpath should be restored/"all footpaths within the site frontages".	<ul style="list-style-type: none"> <li>No objection to a standard condition requiring any damage caused by construction activities to public footpaths outside the site would be raised (noting the internal access off Eels Place is not a Council road). However, any upgrade to footpaths beyond the boundaries of the site and not adjacent to the proposed works (e.g., O'Connell Street and Eels Place) would be an unreasonable imposition, given the nature and location of the proposed works, which will also significantly improve the public domain in a busy pedestrian environment, at no cost to government. The footpaths around the site are not owned by the applicant.</li> </ul>	RtS Revised Plans (Appendix A)
Basement and Flooding (and stormwater)	The basement should be tanked construction and various PMF/flooding considerations appear not to have been considered (as in SEARS request).	<ul style="list-style-type: none"> <li>The basement construction will meet all required specifications arising from DA conditions. The basement is above the flood level and tanking is not necessary.</li> <li>Water NSW have not objected to the proposal.</li> <li>A Flooding report was included with the EIS and a brief updated report/response is provided by TTW (Appendix G).</li> <li>Civil engineering drawings were not part of the submitted SSD and the attachment cover sheet for these drawings is from an earlier 2015 report</li> </ul>	<p>EIS Appendix R</p> <p>RtS Updated Flooding and Stormwater Report (Appendix G)</p> <p>RtS Revised Plans (Appendix A)</p>

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Issue Name	Summary of Issues Raised	Response	Reference to Other Parts or Documents
		associated with the then proposed multi-storey carpark. That carpark has since been erected, and the civil plans for the stormwater referred to in that report approved by Council and installed. In essence, the proposed civil stormwater works for the hotel seek to connect to the existing and approved system, built with capacity in anticipation of a potential building on this site	
ESD Measures	ESD measures to be incorporated are not clear in the plans nor cost plan. Operable windows and louvres to hotel rooms are supported. The 4 Star Green Star is not sufficient to meet SEARS requirements of contemporary good practice (should be NABERS 5+).	<ul style="list-style-type: none"> <li>ESD measures and commitments are clarified in the attached updated ESD report and in this RtS, and shown on the plans where appropriate and to a detail commensurate at DA stage.</li> <li>This is in anticipation of a DA condition requiring green rating commitments to be met, including a 5-Star rating. This is discussed further in part 6.1 this RtS and Appendix F.</li> </ul>	RtS Updated ESD Report (Appendix F) RtS Part 6.1
Social Impacts, Safety and Details	A Social Impact Assessment and Plan of Management has not been provided (a list of issues which should be addressed is included in the submission). CCTV should be provided. A Public Art Plan should be required.	<ul style="list-style-type: none"> <li>Social impacts are addressed in the EIS. A Plan of Management was provided and lodged. Social impacts are addressed further in Part 6.1 of this RtS.</li> </ul>	EIS Appendix V (Plan of Management) EIS Part 6.18 RtS Part 6.1
BDAR Assessment and bird collision	The BDAR assessment is thorough although bird collision should be considered and addressed.	<ul style="list-style-type: none"> <li>Bird collision potential is considered and addressed in the updated BDAR by Cumberland Ecology.</li> </ul>	RtS Revised BDAR (Appendix C) RtS Part 6.1

Response to Submissions (RtS) – Parramatta Leagues Club Hotel

Issue Name	Summary of Issues Raised	Response	Reference to Other Parts or Documents
		<ul style="list-style-type: none"> <li>The updated (and original) BDAR assessment is thorough. The revised BDAR has addressed all issues raised by (then) OEH.</li> </ul>	
Consultation	Encourage further consultation with Council staff.	<ul style="list-style-type: none"> <li>Ongoing consultation is anticipated.</li> </ul>	

**Table 3** – Government/Agency Submissions

## 5.2 NSW Utilities

Issue Name	Summary of Issues Raised	Response	Reference to Other Parts or Documents
<b>Endeavour Energy</b>			
Various Operational matters and conditions	<p>Outlines existing infrastructure.</p> <p>Access and clearance requirements for pad-mounted substations.</p> <p>Access to electrical network in the EIS appears current/accurate.</p> <p>A new substation is proposed which is positive and should meet Endeavour Energy requirements.</p> <p>Various processes for future access to the network and standard requirements for a range of issues.</p> <p>No objection subject to comments and recommendations in the submission.</p>	<ul style="list-style-type: none"> <li>Noted.</li> <li>Conditions recommended are standard and appropriate.</li> </ul>	EIS Part 6.22

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Issue Name	Summary of Issues Raised	Response	Reference to Other Parts or Documents
<b>Sydney Water</b>			
Capacity and Conditions	<p>Adequate capacity for water and wastewater exists, some augmentation may be needed.</p> <p>Conditions which may be attached to a development and subsequent consent.</p> <p>Detailed requirements would be within a future Section 73 application/approval.</p>	<ul style="list-style-type: none"> <li>Noted.</li> <li>Conditions recommended are standard and appropriate.</li> </ul>	EIS Part 6.22

**Table 4** – NSW Utility Submissions

### 5.3 Community Organisations, Interest Groups and Elected Officials

Issue Name	Summary of Issues Raised	Response	Reference to Other Parts or Documents
<b>National Trust of Australia (x2 – National and Regional Branch)</b>			
Alienation of the diminishing parkland	<p><i>The original gazettal of Parramatta Park on 6 August, 1858 set aside an area of 246 acres (99.6 hectares), including the site of this current development proposal. Parramatta Park today has been reduced in area to 85 hectares, with 75% of this alienation having occurred in the last fifty-five years. The new stadium development is yet another massive alienation of the diminishing parkland.</i></p>	<ul style="list-style-type: none"> <li>The site is not parkland. It is an open bitumen carpark with one main large tree being retained and new trees added. It is a hotel between a large club building, a 4-7 storey carpark and large Stadium. The site is neither perceived nor functions as a park.</li> <li>To the contrary, the hotel will improve linkages and the use and enjoyment of the important adjoining park asset, considerably more than the current situation.</li> </ul>	EIS Part 3



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Issue Name	Summary of Issues Raised	Response	Reference to Other Parts or Documents
		<ul style="list-style-type: none"> <li>The site is under an existing private exclusive long-term lease and ownership by Parramatta Park Trust will not change.</li> </ul>	
Inappropriate Height/ Precedent	<p><i>The new Parramatta Stadium has placed a huge, dominating structure within Parramatta Park and it is now argued that this would also justify a 17 storey commercial hotel within the Park.</i></p> <p><i>If this were to proceed within such a significant park (World Heritage, National Heritage and State Heritage listings) then it would set a precedent for other sporting clubs to argue for their own multi-storey commercial developments, most likely in important parklands.</i></p> <p><i>The new Stadium ...it can be clearly seen dominating the skyline from the front steps of the building... The proposed new tower will further impact on that important view.</i></p> <p><i>Any reliance on the Parramatta Stadium as a guide for assessing height is misplaced and out of touch with heritage context of Old Government House and the Female Factory and ancillary buildings.</i></p>	<ul style="list-style-type: none"> <li>The modelling of the reduced height form is contained within the updated SoHVI by Purcell and it is a conclusion of this further assessment that the proposal will not significantly alter the character and skyline of the heritage precinct.</li> <li>The summary views analysis in the updated SoHVI provides an overview of the views relevant to OGHD, those requested by OEH to further illustrate the proposal, and their relative significance and visibility of the proposal.</li> <li>The proposal fully complies with specific heritage controls controlling height for this specific site, contained both within Council's DCP and a Conservation Agreement with the Federal Government. This full compliance is not an adverse precedent, but a positive one.</li> <li>Further visual modelling form within the Female Factory has been undertaken and analysed in the updated SoHVI.</li> <li>The detailed visual modelling from key nominated vistas undertaken as part of the RtS does not support the conclusions and statements made in the submissions.</li> </ul>	<p>RTS Revised Plans (Appendix A)</p> <p>RtS SoHVI (Appendix B)</p> <p>RtS Section 6.1</p>

Response to Submissions (RtS) – Parramatta Leagues Club Hotel

Issue Name	Summary of Issues Raised	Response	Reference to Other Parts or Documents
	<p><i>No decision should be made until the new master planning process is complete and has been considered, understood and accepted by the community.</i></p> <p><i>The absence of any maximum height and floor space controls under the councils current planning controls should not be an invitation to erect an unsympathetic building in one of Australia's most significant heritage precincts.</i></p>	<ul style="list-style-type: none"> <li>As mentioned, there are specific controls for the site relating to height which the proposal fully complies with.</li> </ul>	
SSD Classification	<p><i>I find it difficult to accept that the criterion for such a classification have been satisfied given the examples of State Significant Development (SSD).</i></p>	<ul style="list-style-type: none"> <li>The SSD criteria are within a publicly accessible and legislated State Environmental Planning Policy. This is non-discretionary.</li> <li>The applicant is not responsible for the State Environmental Planning Policy or criteria.</li> </ul>	EIS Part 5.6
Owner's consent	<p><i>it is not clear whether the owner of the site has given permission for the application to be lodged.</i></p>	<ul style="list-style-type: none"> <li>The revised proposal does not rely on owner's consent from VNSW anymore.</li> </ul>	Lodgement documents
Locate Elsewhere	<p><i>There is no valid reason to locate a hotel in this location except the selfish motives of Parramatta Leagues Club to realise a financial benefit for themselves. A hotel would be more appropriately located in the Parramatta CBD where greater</i></p>	<ul style="list-style-type: none"> <li>The hotel will support the park, adjoining Stadium and precinct, and will support rather than diminish tourism to the area, including Parramatta Park and OGHD. This will enhance the use and enjoyment of OGHD and surrounds, rather than claims to the contrary.</li> </ul>	EIS Parts 2 and 9

Response to Submissions (RtS) – Parramatta Leagues Club Hotel

Issue Name	Summary of Issues Raised	Response	Reference to Other Parts or Documents
	<i>access is available to a wider range of services offered in Parramatta.</i>	<ul style="list-style-type: none"> <li>A hotel is appropriate for the site and will complement the precinct.</li> <li>The site of the proposal is a bitumen carpark between a large Club and Stadium building and is under an existing exclusive private long-term lease.</li> <li>The building will improve the public domain and visual presentation of the area, at no cost to government, with an asset to be leased from government, as currently occurs.</li> <li>The use is specifically permissible in the zone.</li> </ul>	
<b>North Parramatta Residents Action Group</b>			
North Parramatta Future	The proposal makes comparison with the massing and scale for future tower buildings for Urban Growth's plans for North Parramatta, which have been announced to be reviewed.	<ul style="list-style-type: none"> <li>A prior announcement has not been progressed to any significance or knowledge of this author. In any event, the prior announcement appeared to apply to the "heritage core", not LEP height limits to the east which continue to apply, as modelled in the visual analysis.</li> <li>The LEP height limits in North Parramatta have not altered and are not known or expected to be reviewed. They did not form part of the recent CBD Planning Proposal.</li> <li>On the other hand, the CBD Planning Proposal has progressed significantly in the last 2 years to the final stages with DPIE, and this includes</li> </ul>	RTS Revised Plans (Appendix A) RtS Updated SoHVI (Appendix B), RtS Section 6.1

Response to Submissions (RtS) – Parramatta Leagues Club Hotel

Issue Name	Summary of Issues Raised	Response	Reference to Other Parts or Documents
		increased FSRs and heights two blocks to the east. This is elaborated upon in Section 6.1 of this RtS.	
Visual Massing presentation	Some images are hard to read and understand.	<ul style="list-style-type: none"> <li>The plans are appropriately detailed and the visual impact assessment is clear. From some vistas the building is not able to be seen as it is essentially below the tree line and this lack of visual impact may have confused some.</li> <li>Despite this, the visual analysis has been reviewed to ensure consistency of colouring and legibility, including where the hotel may not be seen.</li> <li>Visual modelling includes scenarios with and without potential future development under LEP/Planning Proposal height limits.</li> <li>The visual analysis is also updated to account for the reduction of two storeys.</li> </ul>	RTS Revised Plans (Appendix A) RtS Updated SoHVI (Appendix B), RtS Section 6.1
Consultation and Period	<p>Exhibition over the new year period makes submissions difficult/it should be extended</p> <p>Limited community consultation occurred by the applicant and further consultation is needed prior to a private hotel on public land.</p>	<ul style="list-style-type: none"> <li>The consultation period was extended by DPIE and Parramatta Leagues Club supported this decision.</li> <li>It was somewhat difficult to identify stakeholders directly impacted by the proposal. This is generally reflected in the disparate location of public objections, raising issues of general principle or concern, rather than direct impact. Prior consultation was outlined in the EIS.</li> </ul>	EIS Part 2.7

Response to Submissions (RtS) – Parramatta Leagues Club Hotel

Issue Name	Summary of Issues Raised	Response	Reference to Other Parts or Documents
		<ul style="list-style-type: none"> <li>The site is on land which is subject to a current private long-term lease and currently used as a bitumen carpark surrounded by large buildings. The proposal will enhance the setting of the park, rather than the opposite.</li> </ul>	
<b>Julie Owens MP</b>			
Extend Consultation	Extend consultation period given community interest.	<ul style="list-style-type: none"> <li>The consultation period was extended by DPIE and Parramatta Leagues Club supported this decision.</li> </ul>	Decision by DPIE.
Heritage Impacts	<p>Concerns raised to the member include impacts on the world OGHG listing and national Female Factory.</p> <p>Many people have advocated for the national listing of the Female Factory.</p>	<ul style="list-style-type: none"> <li>The impacts on OGHG, Female Factory and issues related to the proposed height have been previously addressed and are subject to additional view modelling, a revised reduced height and a revised Statement of Heritage and Visual Impact by Purcell.</li> <li>It is understood efforts to list the Female Factory on a world heritage list have been ongoing for some time and have not been successful to date. The site is now on the National Heritage Register. The impacts on that site have been considered and addressed in the EIS, supporting documentation and the revised proposal and supporting documentation, including updated SoHVI with additional visual modelling.</li> </ul>	<p>RTS Revised Plans (Appendix A)</p> <p>RtS Updated SoHVI (Appendix B),</p> <p>RtS Section 6.1</p>

**Table 5** – Community Organisations and Elected Officials

#### 5.4 Public Submissions

Issue Name	Summary of Issues Raised	Response	Reference to Other Parts or Documents
<b>Pro-forma letters (39)</b>			
Heritage Impacts	Heritage/visual impacts on OGHD, including from proposed height. Heritage/visual impacts on the Female Factory, including from proposed height (which may become world-heritage listed). Conservation Area Impacts.	<ul style="list-style-type: none"> <li>The impacts on OGHD, Female Factory and issues related to the proposed height are subject to additional view modelling, a revised reduced height and a revised Statement of Heritage and Visual Impact by Purcell.</li> <li>It is understood efforts to list the Female Factory on a world heritage list have been ongoing for some time and have not been successful to date. The site is now on the National Heritage Register. The impacts on that site have been considered and addressed in the EIS, supporting documentation and the revised proposal and supporting documentation, including updated SoHVI with additional visual modelling.</li> <li>The proposal is around 50m away from any local heritage areas and there has been additional visual modelling along O'Connell Street included in the RtS attachments. Impacts on the adjoining Conservation Area are considered and addressed in the updated SoHVI by Purcell.</li> </ul>	RTS Revised Plans (Appendix A) RtS Updated SoHVI (Appendix B), RtS Section 6.1
Building Heights	The proposed height is excessive. Heights in the surrounds may change due to pending master	<ul style="list-style-type: none"> <li>The impacts on OGHD, Female Factory and issues related to the proposed height have been previously addressed and are subject to additional view modelling, a revised reduced</li> </ul>	RTS Revised Plans (Appendix A) RtS Updated SoHVI (Appendix B),

Response to Submissions (RtS) – Parramatta Leagues Club Hotel

Issue Name	Summary of Issues Raised	Response	Reference to Other Parts or Documents
	planning and government announcement.	<p>height and a revised Statement of Heritage and Visual Impact by Purcell.</p> <ul style="list-style-type: none"> <li>The height limits in the surrounding area have been based on LEP height limits. There is no certainty at all that these heights will be reduced, including to the east of the North Parramatta heritage core.</li> <li>The draft Planning Proposal for the CBD seeks to increase heights and FSRs two blocks to the east of the site and this will dramatically affect the skyline “behind” the site as viewed from the west over time as development occurs, including from OGHD. This has been modelled in Appendix A, based on the latest information available. However, the proposal does not rely on future development for its justification.</li> <li>This is elaborated upon in Section 6.1 of this RtS.</li> </ul>	RtS Section 6.1
Design Review Process	Design Excellence process questioned (including role/potential conflict from Parramatta Park Trust involvement), and it does not address all LEP matters and this should not be used to justify departures from planning controls in the Parramatta LEP.	<ul style="list-style-type: none"> <li>Parramatta Park Trust is the owner of the site and is also a place manager for the adjoining Parramatta Park. It was appropriate they observe the process of design excellence review due to their interest in seeing a high-quality outcome for the site and Park. They took no part in the Panel decision or deliberations, contrary to indirect assertions made.</li> <li>The design excellence process was very intense and robust. It was chaired by the reputable and</li> </ul>	EIS Part 6.1 EIS Appendix E1, E2.

Response to Submissions (RtS) – Parramatta Leagues Club Hotel

Issue Name	Summary of Issues Raised	Response	Reference to Other Parts or Documents
		<p>independent NSW Office of the Government Architect and included the well-respected City Architect from Parramatta Council and an independent well-regarded architect. There is no requirement to have such a process in Parramatta LEP, as the site is outside the applicable controls for such processes.</p> <ul style="list-style-type: none"> <li>The process held was “over and above” anything required in Parramatta LEP 2011, which may not have been understood by the authors raising this concern.</li> <li>No controls in PLEP 2011 nor in Parramatta DCP related to this site are breached, including detailed heritage controls regulating height.</li> </ul>	
Consultation	Lack of prior community consultation.	<ul style="list-style-type: none"> <li>The consultation process for the DA was extended. The consultation prior to lodgement was outlined in the EIS.</li> </ul>	Decision by DPIE
Ecological	Impacts on Grey Headed Flying Fox Colony and Conservation Area impacts.	<ul style="list-style-type: none"> <li>The impacts on the GHFF have been addressed in a revised and updated detailed BDAR, which also addresses issues raised by OEH and Council.</li> </ul>	RtS Updated BDAR (Appendix C), RtS Part 6.1
<b>Other Submissions and Other Issues (Not above)</b>			
Overshadowing	Excessive overshadowing of the park.	<ul style="list-style-type: none"> <li>Detailed overshadowing plans are provided and show very minor impacts, with no impacts on Parramatta Park. This will be further reduced by the reduction in height by two storeys.</li> </ul>	RtS Revised Plans (Appendix A)



Response to Submissions (RtS) – Parramatta Leagues Club Hotel

Issue Name	Summary of Issues Raised	Response	Reference to Other Parts or Documents
Bulk	Excessive bulk.	<ul style="list-style-type: none"> <li>The bulk is not considered excessive. The floorplate size is modest and the building is well modulated and tailored for the site and surrounds.</li> <li>No planning controls are breached and the height is fully within detailed heritage controls.</li> <li>The bulk, scale, height and design aspects were supported after a detailed Design Excellence process.</li> </ul>	<p>RtS Revised Plans (Appendix A)</p> <p>RtS Part 6.1</p> <p>EIS Appendix E1 (Panel Report)</p>
Legibility/accuracy	<p>Hard to understand plans.</p> <p>Visual analysis was confusing.</p> <p>Change in storeys between SEARS and DA confusing.</p> <p>Montages seem to underestimate the height.</p>	<ul style="list-style-type: none"> <li>The plans are appropriately detailed and the visual impact assessment is clear. From some vistas the building is not able to be seen as it is essentially below the tree line and this lack of visual impact may have confused some.</li> <li>Despite this, the visual analysis has been reviewed to ensure consistency of colouring and legibility, including where the hotel may not be seen.</li> <li>The overall height between the SEARs request and the DA did not change, so the number of storeys is somewhat academic. Building height is measured in metres, not storeys and the RLs of every level and roof are provided in the detailed plans.</li> <li>However, the height of the building has been reduced a further two storeys (6m) in the revised proposal with the RtS. The visual analysis is also</li> </ul>	<p>RtS Revised Plans and Visual Analysis (Appendix A)</p>

Response to Submissions (RtS) – Parramatta Leagues Club Hotel

Issue Name	Summary of Issues Raised	Response	Reference to Other Parts or Documents
		<p>updated to account for the reduction of two storeys.</p> <ul style="list-style-type: none"> <li>The montages were based on digital data and accurate CAD diagrams, consistent with methodology outlined in the SEARs and Land and Environment Court technical guidelines, produced under guidance by a well-respected architectural firm.</li> </ul>	
Historical matters	History shows previous salary cap breaches and Heritage Council concerns.	<ul style="list-style-type: none"> <li>The Club's past issues with a salary cap are not unique to the Parramatta Club and are wholly irrelevant for the DA.</li> <li>The concern raised by OEH prior to lodgement was not specific but mentioned previous concerns regarding other development and cumulative impacts.</li> <li>Any heritage assessment must be robust, factually-based and in line with technical specifications and controls, which has occurred by the applicant.</li> <li>Consultation on the draft heritage assessment occurred prior to DA lodgement and some technical matters were raised by OEH (and addressed), without any specific height concerns being raised at that time.</li> </ul>	NA
Motives are questionable	Question cost and viability, with no business case.	<ul style="list-style-type: none"> <li>The project is privately funded, at no cost to government, on land which is currently privately</li> </ul>	EIS Part 2 EIS Part 3.1-3.3

Response to Submissions (RtS) – Parramatta Leagues Club Hotel

Issue Name	Summary of Issues Raised	Response	Reference to Other Parts or Documents
	<p>Driven by a desire to create more gambling revenue.</p> <p>Represents corporate greed.</p> <p>No reduction in a developer contribution should be given.</p> <p>Will remove public land from the control of Parramatta Park Trust.</p> <p>"They have already stolen our pool".</p>	<p>leased for a long period. The viability and business case are a matter for the Club.</p> <ul style="list-style-type: none"> <li>Contrary to an assertion, the proposal actually seeks to decrease reliance on gaming revenue, by diversifying the Club's activities, while at the same time seeking to enhance the park, leisure and recreation/sporting activities in the precinct.</li> <li>No objection is raised to a s7.11 contribution being levied. The EIS merely pointed to some benefits of the proposal in deciding whether this levy is imposed and no reduction was specifically sought. As stated in the EIS (pg. 74) "...This would be expected to be applied through a condition of consent, if approval was granted".</li> <li>The site will remain under the ownership of Parramatta Park Trust.</li> <li>The reference to a stolen pool is confusing. This previous pool removal on public land had nothing to do with Parramatta Leagues Club. A new public pool has been built in any event, by others.</li> </ul>	<p>EIS Page 74</p> <p>EIS Owner's consent</p>
Loss of public land/parkland	<p>Park has reduced from original 99.6 Hectares to 85 Hectares since 1858.</p> <p>Loss of parkland.</p> <p>Lack of sufficient public domain.</p> <p>Loss of green space.</p> <p>Loss of public land.</p>	<ul style="list-style-type: none"> <li>The proposal does not lead to any loss of parkland.</li> <li>The site is currently under an exclusive long-term lease by the Parramatta Leagues Club and contains a bitumen carpark for the Club, surrounded by large buildings.</li> </ul>	<p>EIS Part 2</p> <p>EIS Part 3.1-3.3</p> <p>RtS Revised Plans (Appendix A)</p>

Response to Submissions (RtS) – Parramatta Leagues Club Hotel

Issue Name	Summary of Issues Raised	Response	Reference to Other Parts or Documents
		<ul style="list-style-type: none"> <li>• The landscaping and green space of the site will be significantly improved.</li> <li>• The parkland setting, public domain and entry to the park will be significantly improved.</li> <li>• The use is complementary to the park and precinct and specifically permissible in the zone.</li> </ul>	
Process questionable	<p>Should not be a State Significant Development.</p> <p>Greater Sydney Commission have not been involved.</p> <p>Consultation period too short.</p> <p>No construction timeframe given.</p>	<ul style="list-style-type: none"> <li>• The proposal constitutes State Significant Development due to a gazetted State Policy (SEPP), which is applied consistently, without discretion.</li> <li>• The Greater Sydney Commission are not ordinarily involved in development assessment. The Greater Sydney Commission was not required to be consulted and any views are a matter for that body.</li> <li>• The consultation period was extended by DPIE and Parramatta Leagues Club supported this decision.</li> <li>• The construction period would be expected to be approximately 18 months. Construction impacts will be temporary, and reasonably minimised due to limited direct interfaces with surrounding private land. Impacts on the Stadium and surrounding infrastructure can be addressed by conditions of consent.</li> </ul>	<p>EIS Part 2.1</p> <p>EIS Part 4.4</p> <p>EIS Part 5.6</p>

Response to Submissions (RtS) – Parramatta Leagues Club Hotel

Issue Name	Summary of Issues Raised	Response	Reference to Other Parts or Documents
Wrong Location	<p>There should be no hotel anywhere in Parramatta Park.</p> <p>Not needed – should be somewhere else.</p> <p>Would destroy the park and tourism to the area.</p> <p>Building in a floodplain it should not be allowed.</p>	<ul style="list-style-type: none"> <li>The hotel will complement Parramatta Park, adjoining Stadium and area, and support rather than diminish tourism to the area, including Parramatta Park and OGH. This should enhance the use and enjoyment of OGH and surrounds, rather than claims to the contrary. The concerns raised are not based on factual analysis.</li> <li>A hotel is appropriate for the site and will complement the precinct.</li> <li>The site of the proposal is a bitumen carpark under an exclusive private long-term lease.</li> <li>The building will improve the public domain and visual presentation of the area, at no cost to government.</li> <li>The land is leased from the Government currently, on a long-term lease.</li> <li>The use is specifically permissible in the zone.</li> <li>Flooding impacts have been closely considered and addressed. The hotel is well above the flood planning level and stormwater runoff will be reduced compared to the current situation of bitumen parking, to the benefit of the wider catchment.</li> </ul>	EIS Appendix R RtS Updated Flooding and Stormwater Report (Appendix H)
Cycling Infrastructure	Lack of cycling infrastructure.	<ul style="list-style-type: none"> <li>The plans include “end of trip facilities” for parking in the basement for staff.</li> </ul>	RTS Revised Plans (Appendix A)

Response to Submissions (RtS) – Parramatta Leagues Club Hotel

Issue Name	Summary of Issues Raised	Response	Reference to Other Parts or Documents
		<ul style="list-style-type: none"> <li>The adjoining large carpark provides ample bicycle parking.</li> <li>Cycling infrastructure is also accommodated in the wider park precinct, noting its size.</li> <li>Overall pedestrian and cycle access will be significantly improved compared to the current situation, contrary to the opposite assertion made.</li> </ul>	RtS updated Traffic and Parking Assessment (Appendix E)
Acoustic Impacts	<p>Acoustic impacts from roofed areas and hotel/bars.</p> <p>Concerns with assumptions in the acoustic report.</p> <p>Cumulative noise impacts.</p>	<ul style="list-style-type: none"> <li>Acoustic impacts are addressed in the submitted acoustic report with the EIS and are able to be addressed by conditions of consent.</li> <li>The acoustic report adopts accepted methodology.</li> <li>There is potential shielding of noise from people in the public domain on busy event times from the new building to the pedestrianised areas to the south and east of the site (this potential positive impact has not been modelled).</li> </ul>	EIS Part 6.12 EIS Appendix Q
Parking	Parking impacts in the wider area.	<ul style="list-style-type: none"> <li>Parking impacts are addressed in the original Traffic and Parking assessment and parking demand is fully met on site by the existing large 4-7 storey carpark. The hotel has since been reduced in size with this RtS, by around 15% of Gross Floor Area and 10% of rooms.</li> <li>The hotel benefits from an adjoining carpark and foresight from the Club in providing parking demand for the site and area. There will be</li> </ul>	EIS Part 6.1 EIS Appendix K RtS Revised Traffic and Parking Assessment (Appendix E) RtS Part 6.1

Response to Submissions (RtS) – Parramatta Leagues Club Hotel

Issue Name	Summary of Issues Raised	Response	Reference to Other Parts or Documents
		<p>counter-cyclical parking demand peaks, which makes sound sustainable use of existing resources.</p> <ul style="list-style-type: none"> <li>• Providing accommodation adjoining a large venue has potential to reduce parking demand and traffic on event days.</li> </ul>	
Traffic Impacts	<p>Traffic impacts on O'Connell Street/ Signalised intersections.</p> <p>Impacts on future light rail.</p> <p>Traffic conflicts at the access road.</p>	<ul style="list-style-type: none"> <li>• Traffic impacts have been comprehensively addressed, including on intersections, using well-accepted methodology.</li> <li>• The access to the site has been revised to no longer include access from the south (otherwise known as the northern access road on VNSW land). Instead, access will be to and from Eels Place, which was also preferred by TfNSW and then RMS.</li> <li>• A comprehensive revised Traffic and Parking Assessment has been provided by TTPP, which also addresses potential impacts on Parramatta Light Rail.</li> <li>• Traffic impacts will be reduced overall due to the reduction of 19 rooms and around 15% of the Gross Floor Area, as part of the revised proposal.</li> </ul>	<p>RtS Revised Traffic and Parking Assessment (Appendix E), RtS Part 6.1</p>
Sustainability	Does not represent sustainable development.	<ul style="list-style-type: none"> <li>• The proposal does represent sustainable development.</li> <li>• Sustainability principles have been addressed in the EIS (Part 5.2).</li> </ul>	<p>EIS Part 5.2 EIS Appendix A (Plans) EIS Appendix O</p>

Response to Submissions (RtS) – Parramatta Leagues Club Hotel

Issue Name	Summary of Issues Raised	Response	Reference to Other Parts or Documents
		<ul style="list-style-type: none"> <li>The sustainability measures and commitments have been further considered and addressed in a report by JHA with the RtS and outlined in this RtS.</li> </ul>	<p>RtS Updated ESD Report (Appendix F)</p> <p>RtS Part 6.1</p>
Safety	<p>Fire impacts to Old Government House due to its proximity.</p> <p>Fire safety questioned – lack of egress and Eels Place narrow.</p>	<ul style="list-style-type: none"> <li>The concern about potential fire to the roof of Old Government House from a new sprinklered building over 600m away is extremely remote, and may arise from a lack of knowledge of the site and distances.</li> <li>There are various routes for people to take in the event of a fire.</li> <li>The design has been supported by a detailed BCA report.</li> </ul>	EIS Appendix P
Aboriginal Impacts	Adverse Aboriginal Impacts.	<ul style="list-style-type: none"> <li>Aboriginal impacts have been considered and addressed in the archaeological assessment submitted by an expert firm (Austral Archaeology).</li> <li>An updated report and further testing have occurred.</li> <li>Further information is also in Part 6.1.</li> </ul>	<p>EIS Appendix H,</p> <p>RtS Updated Archaeology Report (Appendix D),</p> <p>RtS Part 6.1</p>
Public Interest/ Precedent	<p>Approval would not be in the public interest.</p> <p>Adverse precedent for other Clubs.</p>	<ul style="list-style-type: none"> <li>Approval would be in the public interest.</li> <li>The proposal should be considered on its own merits and does not represent any precedent for other clubs, noting the unique nature of the site, the surrounds and the proposal.</li> </ul>	Whole EIS and RtS



Response to Submissions (RtS) – Parramatta Leagues Club Hotel

Issue Name	Summary of Issues Raised	Response	Reference to Other Parts or Documents
		<ul style="list-style-type: none"> <li>The overall objections raised do not warrant refusal of the application.</li> </ul>	

**Table 6** – Public Submissions

**5.5 Summary Response to DPIE letter of 1 April 2019**

Issue Name	Summary of Issues Raised	Response	Reference to Other Parts or Documents
Landowners Consent	Landowners Consent from VNSW is needed with the RtS from VNSW given access over their land.	<ul style="list-style-type: none"> <li>The revised proposal involves no access or works to VNSW land and their owner's consent is no longer required.</li> </ul>	RtS Revised Plans (Appendix A)
Building Height/ Heritage	<p>Give further consideration to the height in the context of surrounding height controls, noting recent changes to the Parramatta Growth centre and comments from Council;</p> <p>Undertake further consultation with the Heritage Council;</p> <p>Identify the proportion of the building within the tree canopy in light of the specific controls in PDCP 2011 for OGH.</p>	<ul style="list-style-type: none"> <li>The height has been reduced by two floors (6m in height).</li> <li>Further consultation occurred with the NSW Heritage Office. Updated consultation is planned upon completion of a Peer Review.</li> <li>The proportion of the building within the tree line is shown in the visual analysis by Hassell and updated SOHVI report by Purcell, and this fully complies with the specific controls in Parramatta DCP 2011.</li> <li>Further analysis and explanation are provided in Part 6.1 of this RtS, including in relation to the surrounding planning controls.</li> </ul>	<p>RtS Revised Plans (Appendix A)</p> <p>RtS Revised SoHVI (Appendix B)</p> <p>RtS Part 6.1</p>
Biodiversity	Notes issues raised by then OEH;	<ul style="list-style-type: none"> <li>All issues raised by OEH (and Council) have been considered and addressed in the updated BDAR</li> </ul>	RtS Updated BDAR (Appendix C)

Response to Submissions (RtS) – Parramatta Leagues Club Hotel

Issue Name	Summary of Issues Raised	Response	Reference to Other Parts or Documents
	Recommends updated the Biodiversity Development Assessment Report (BDAR).	<p>(both in clean and track changed versions, as requested by OEH). This has also been recently updated to account for the latest legislation and guidelines.</p> <ul style="list-style-type: none"> <li>Further analysis and explanation are provided in Part 6.1 of this RtS.</li> </ul>	RtS Part 6.1
Archaeology	Undertake additional ground testing given SERAs and OEH comments.	<ul style="list-style-type: none"> <li>Additional ground testing has occurred.</li> <li>Further analysis and explanation are provided in the updated archaeological report and in Part 6.1 of this RtS.</li> </ul>	RtS Updated Archaeology Report (Appendix D), RtS Part 6.1
Traffic and Access	<p>Alternative access may need to be considered given issues related to owner's consent and preference for alternative access;</p> <p>Further details including operational matters, management during major events;</p> <p>Swept paths analysis;</p> <p>Update the traffic report to address the Parramatta Light Rail;</p> <p>Provide a draft Loading Management Plan;</p> <p>Pedestrian crossing to comply with Australian Standards;</p>	<ul style="list-style-type: none"> <li>Operational matters including during major events have been included in the updated traffic report with this RtS.</li> <li>Swept path analysis is provided in the updated traffic report with this RtS.</li> <li>The Parramatta Light Rail has been addressed in the in the updated traffic report with this RtS, including after consultation with TfNSW.</li> <li>The proposed pedestrian crossing in the southern access road on VNSW is no longer proposed.</li> <li>The removal of the pedestrian crossing and southern access road means no new connections are proposed to surrounding roads, avoiding any impacts to bike paths and Council's Bike Plan.</li> </ul>	RtS Revised Traffic and Parking Assessment (Appendix E), RtS Part 6.1

Response to Submissions (RtS) – Parramatta Leagues Club Hotel

Issue Name	Summary of Issues Raised	Response	Reference to Other Parts or Documents
	Address Council's Bike Plan and connections around the site.	<ul style="list-style-type: none"> <li>Further analysis and explanation are provided in the updated traffic report and Part 6.1 of this RtS.</li> </ul>	
Impact Assessment	<p>Update vista analysis to remove reference to "Urban Growth Towers" and clearly identify the proposal;</p> <p>Any indicative surrounding development should reflect the latest proposed for the Parramatta Growth Centre.</p>	<ul style="list-style-type: none"> <li>Vistas have been updated to remove reference to urban growth towers, but retain existing LEP height limits where relevant in vistas, and colours/depictions have been made clear and consistent.</li> <li>Visual analysis includes modelling both with and without potential future buildings, to allow assessment to occur in the absence of potential future buildings.</li> <li>The "Parramatta Growth Centre" is now referred to as the "CBD Planning Proposal" and the latest proposed controls have been addressed and added to the visual impact analysis, where future buildings may be visible.</li> <li>Further analysis and explanation are provided in the updated plans/analysis by Hassell, updated heritage assessment and Part 6.1 of this RtS.</li> </ul>	<p>RtS Revised Plans (Appendix A),</p> <p>RtS Revised SoHVI (Appendix B)</p> <p>RtS Part 6.1</p>
Views	Provide additional urban vistas from the south-west and in the context of the CBD.	<ul style="list-style-type: none"> <li>Additional urban vistas have been added to the visual impact diagrams by Hassell and further analysis and explanation are provided in Part 6.1 of this RtS.</li> </ul>	<p>RtS Revised Plans (Appendix A)</p> <p>RtS Part 6.1</p>
Public Domain	Include additional details of the public domain with any revised plans, as relevant.	<ul style="list-style-type: none"> <li>The updated plans include public domain detail, of an appropriate detail for a DA.</li> </ul>	<p>RtS Revised Plans (Appendix A)</p>

Response to Submissions (RtS) – Parramatta Leagues Club Hotel

Issue Name	Summary of Issues Raised	Response	Reference to Other Parts or Documents
		<ul style="list-style-type: none"> <li>The public domain around the site within the site boundaries will be significantly improved by the proposal.</li> </ul>	
ESD	<p>Identify how measures in the ESD report will be incorporated into the development, with details shown on the plans where relevant;</p> <p>The report references green walls and roofs but it is unclear if these are proposed.</p>	<ul style="list-style-type: none"> <li>A table is provided in Part 6.1 of this report addressing measures in the previous ESD report,</li> <li>An updated ESD report is provided, including addressing issues raised by Council and providing commitment to a 5-star Green-Star rating.</li> <li>A green roof is proposed to the podium, as shown on the revised plans.</li> </ul>	<p>RtS Updated ESD Report (Appendix F)</p> <p>RtS Part 6.1</p>
Gross Floor Area	Ensure the GFA within the plans and RtS align.	<ul style="list-style-type: none"> <li>The GFA is shown on the plans and matches that within this RtS. The GFA has been reduced by approximately 15%.</li> </ul>	<p>RtS Part 4.1</p> <p>RtS Revised Plans (Appendix A)</p>

**Table 7** – Summary Response to DPIE Letter of 1 April 2019

## **6 Evaluation**

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### **6.1 Assessment of Revised Current Proposal and Elaboration on Key Issues**

#### **6.1.1 Heritage Impacts**

The heritage impacts of the proposal are addressed in a revised and updated Statement of Heritage and Visual Impact ("SoHVI") by Purcell, contained at Appendix B to this RtS.

An independent Peer Review has been commissioned, noting the updated SoHVI has been completed recently and will be provided when complete.

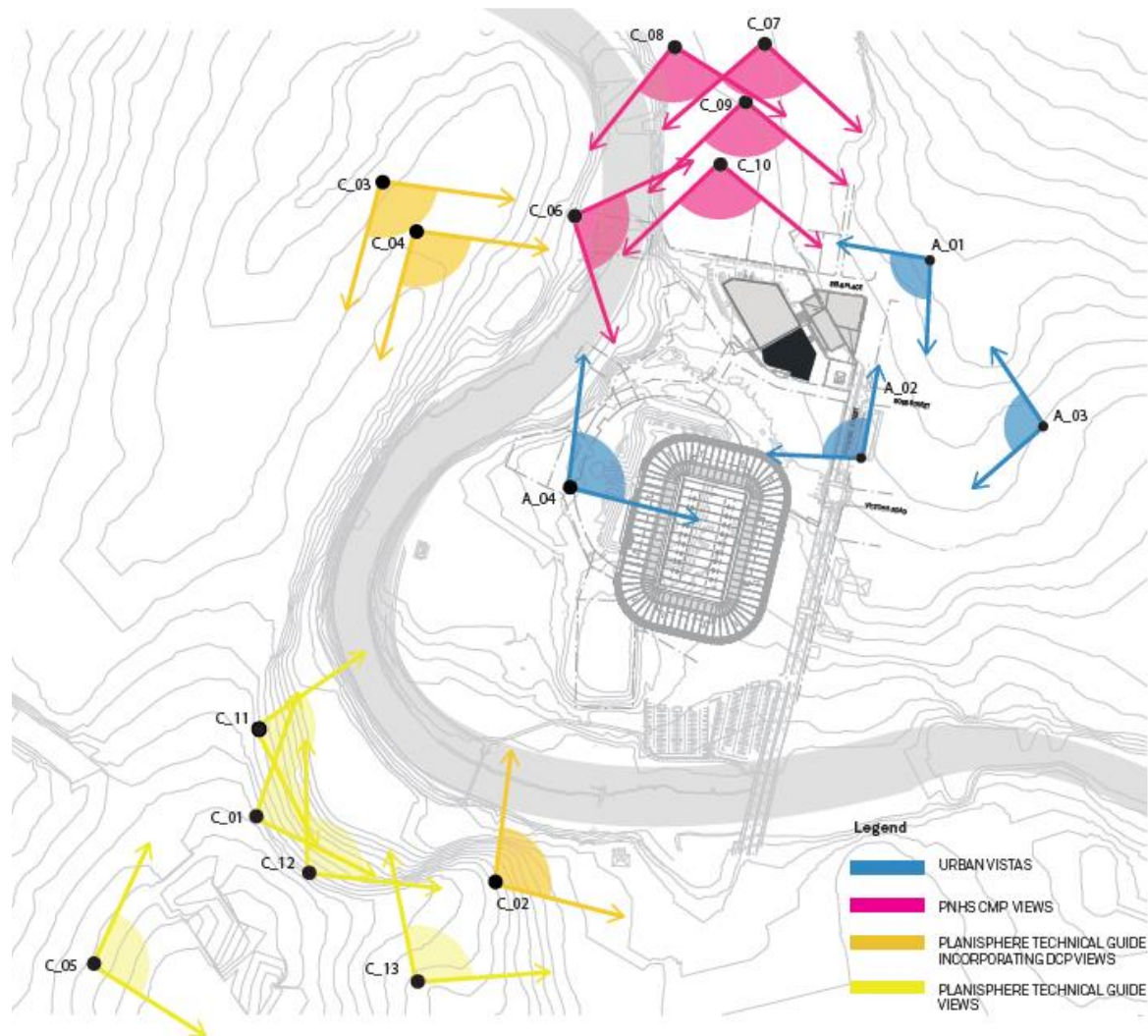
The updated SoHVI has undertaken further review of the revised proposal, including the reduction of two levels, being 6m in height. The SoHVI also includes additional commentary on visual impacts from various vistas from OGHD and the Female Factory/Norma Parker Centre, including as requested by then NSW OEH.

The visual impact analysis and base documents to assess visual impact have been prepared by Hassell (architects), using photographs and methodology within the Land and Environment Court "Photomontage Policy". This visual analysis is contained at Appendix A of this RtS and includes the following changes or additions since the DA and associated EIS:

1. Modelling of the revised proposal, including reduced height. The original proposal is also included to allow comparison;
2. Updated base photos to show the completed Stadium Building, where relevant;
3. Additional "urban" vistas around the site, to show visual impacts in the context of the surrounding buildings and existing development (this was requested by DPIE and Council);
4. Additional heritage vistas from the Female Factory (this was requested by NSW OEH), and within the Planisphere Technical Guide 2012 for OGHD: an additional 7 vistas in total;
5. Removal of reference to "Urban Growth" towers, while retaining potential future buildings under existing Parramatta Local Environmental Plan 2011 height controls (labelled "PLEP 2011 Height Limit");
6. Addition of potential future building envelopes arising from the latest draft CBD Planning Proposal (this was requested to be analysed by DPIE and Council), although also including visual analysis without such potential building envelopes; and
7. Rationalisation of the depiction and colours for consistency and legibility, including:
  - a. Pink for the proposed building;
  - b. A white "wire frame" of the proposed building when behind other buildings or trees, to allow understanding of the site and building in relation to vistas;
  - c. Orange shading for PLEP 2011 Height Limit indicative building envelopes;

- d. Light orange shading for draft CBD Planning Proposal indicative building envelopes;
- e. Including visual impacts with the proposed building only (not including potential future buildings under PLEP 2011 controls or the draft CBD Planning Proposal).

These various vistas are shown in the figure below.



**Figure 4** – Heritage and Urban Vistas within Visual Analysis (Hassell)

In terms of heritage impacts, the site is not heritage-listed as it is neither a Heritage Item nor within a Heritage Conservation Area. Potential heritage impacts instead relate to those being “within the vicinity” of other heritage items or Areas. In this regard, the following three considerations are relevant:

1. Old Government House Domain (“OGHD”), being a local, State, Federal and Internationally-listed heritage item;



2. The Female Factory and Institutions Precinct, being on the National Heritage Register (although part of the wider North Parramatta Heritage sites which include other State and locally-listed items);
3. Local Heritage Items and a Conservation Area in the wider vicinity.

These heritage aspects are addressed in summary below.

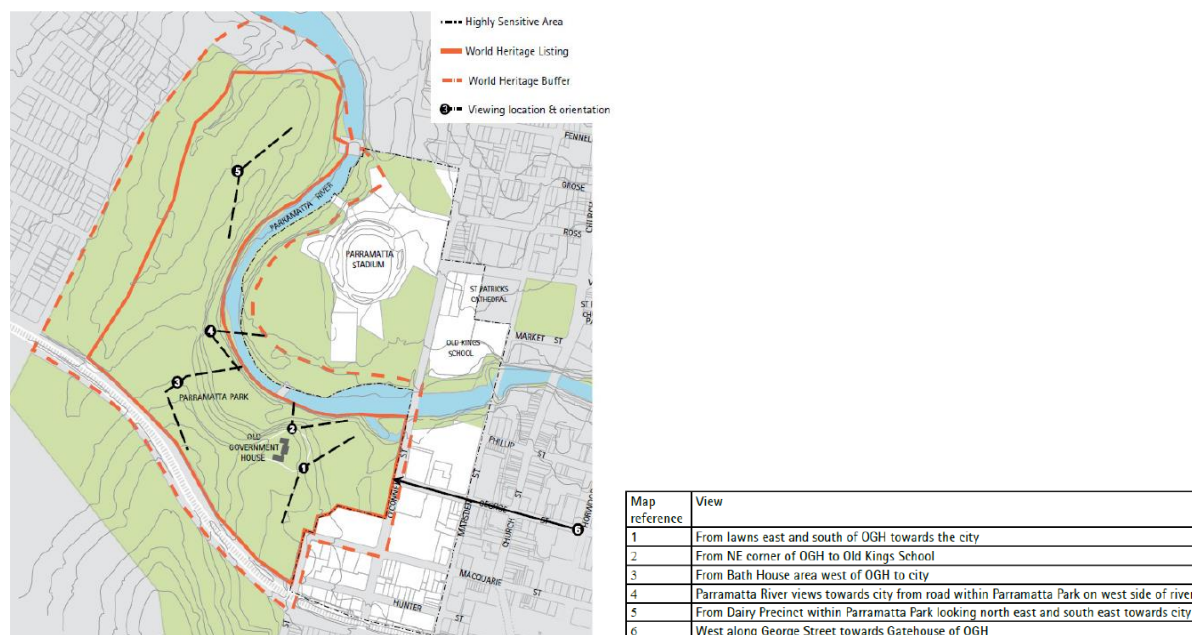
#### 6.1.1.1 Old Government House Domain ("OGHD")

As outlined in Appendix B by Purcell, this item is nationally and internationally-listed. There is a Conservation Agreement between the Federal Government and the Council in terms of assessing impacts on its heritage significance, and this is accompanied by a Technical Guide by Planisphere (2012). There are also controls within Parramatta Development Control Plan ("DCP") 2011, which replicate controls in that Technical Guide (although have different numbering systems for vistas, which can be confusing).

The subject site of the proposed hotel is not within the OGHD listing itself nor the listed/mapped buffer zone (and is around 600m from Old Government House), although is identified as being on the boundary of a "highly sensitive" adjoining area within the Planisphere Technical Guide, and thereby the Conservation Agreement.

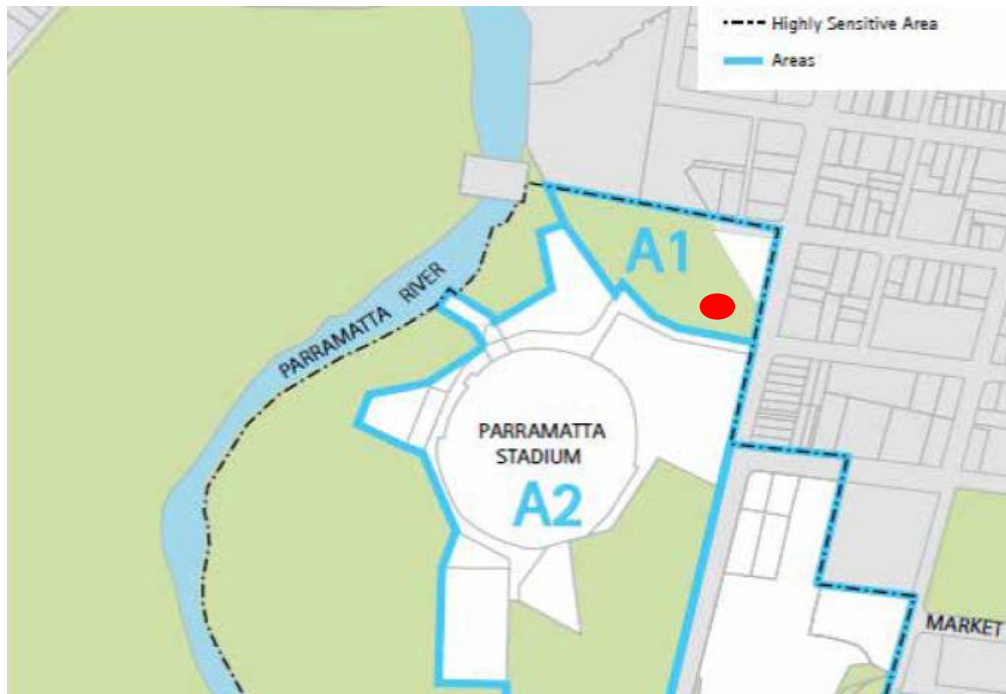
The vistas within the Planisphere Technical Guide and Parramatta DCP 2011 have been subject to the attached visual impact analysis (Appendix A), where relevant to the site.

The vistas within the Planisphere Guide have graded levels of significance. The most significant vistas are included in PDCP 2011, of which there are 6. Only 2 of these 6 are of relevance for the subject site, being vistas 2 and 5 in the DCP (being the same as vistas 3 and 10 in the Planisphere Guide), shown below:



**Figure 5 – PDCP 2011 Extract (Key Vistas)**

There are also specific controls related to these key vistas in Parramatta DCP 2011 (Special Precinct Controls), as below:



**Area A1– Parramatta Leagues Club Site**

- a. At least 80% of the building height must be contained below the level of the surrounding established tree canopy of Parramatta Park when viewed from any of the key viewing locations from OGH D shown in Figure 4.3.3.7.7. Any building element must be oriented so as to minimise the visual impact from these viewing 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.

**Figure 6 - Key Vistas controls in PDCP 2011 (site red dot)**

In order to confirm compliance with these specific height controls relative to the OGH D cited above, visual modelling was done from Vistas 2 and 5.

Hassell architects have confirmed the buildings are 95-100% below the treeline at the two vistas, meaning far more of the building is below the DCP control of 80%, as permitted. Or conversely, far less than 20% of the building height is above the treeline. It should be noted that the 95% assessment by Hassell is conservative, as the proposed building is essentially 100% within the overall treeline and the differing 5% relates to a small portion visible in a break below the overall treeline (see figures below). The proposal also fully meets other controls above related to materials and signage.

**So, the building is lower than both the DCP controls and Conservation Agreement allow, in relation to the key heritage vistas and impacts on OGH D.** This is shown below.



100%



**Figure 7** - Key Vista 2 PDCP 2011

As shown above, the proposed building is 100% behind the treeline and cannot be seen.

95%



**Figure 8** - Key Vista 5 PDCP 2011, revised DA

As shown above, the proposed building is essentially 100% below the overall treeline, although a part would be visible in a tree “break” below the overall treeline. It is also noted other buildings are visible from this vista in the Parramatta CBD, as shown above, far more than that proposed.

#### Other Heritage Vistas

Additional visual modelling was undertaken from **vistas 2, 3, 4, 6, 9, 10 and 16** within the Planisphere Technical Guide for OGHD.

As outlined in the attached Statement of Heritage and Visual Impact by Purcell (Appendix B), these impacts are non-existent or minor, whether or not considered in the context of other existing building or potential/likely buildings under existing and draft planning controls. The vistas are taken from the “worst case scenario” of vista locations (as no co-ordinates are given in the Planisphere document) and show either no impact, or impact that is very minor.



The NSW OEH (Heritage) did raise concerns about height both in their submission and in subsequent consultation. In this regard, additional visual modelling has been undertaken, as provided, with the reduced height. A response to the OEH issues has been provided in the previous Section 5 of this report and is also addressed in detail in the SoHVI at Appendix B.

#### 6.1.1.2 Parramatta Historic Sites (including Female Factory and Institutions Precinct)

Unlike OGHD, the Parramatta Historic Sites including the Female Factory and Institutions Precinct does not have DCP controls that apply to the site(s) and does not have a Conservation Agreement identifying the subject site as being within a sensitive adjoining area. However, it does have an associated Conservation Management Plan ("CMP") by TKD Architects for the consolidated sites (2017) and this document includes a number of historic views. The SoHVI at Appendix B provides further details regarding the various heritage listings of surrounding sites (page 9).



**Figure 9** – Extract of views within TKD Architects CMP for North Parramatta Consolidated Sites

The visual impact analysis indicates that the proposed development does not present significant impact to the National and OUVs of OGHD, nor to the National Heritage Values of the Parramatta Female Factory and Institutions Precinct. It does not present a significant impact to the landscape setting, visual prominence and values of the sites. The proposal does not impact the historic views toward or within the PNHS, namely it does not detract from the attributed values and significance of the subject views and visual connections within the PNHS. Notwithstanding it is recognised that the proposal will be partially visible in views 49a and 51. An assessment of the prominence of proposal is outlined in 6.1.4. It concludes that the visual does not present a substantial impact to the heritage values of the PNHS.

#### 6.1.1.3 Other Heritage Items and Conservation Area to the east

**Heritage**

- Conservation area - General
- Item - Archaeological
- Item - General

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The impacts on the heritage items and Conservation Area to the east of the subject site is mitigated by the separation distance (approximately 65m at the nearest point of the proposed building to the buildings on the eastern side of O'Connell Street), existing street trees and large Lemon-Scented gum tree to the east of the hotel (being retained and a feature of the hotel forecourt), and surrounding large buildings including the Parramatta Leagues Club and Parramatta Stadium.

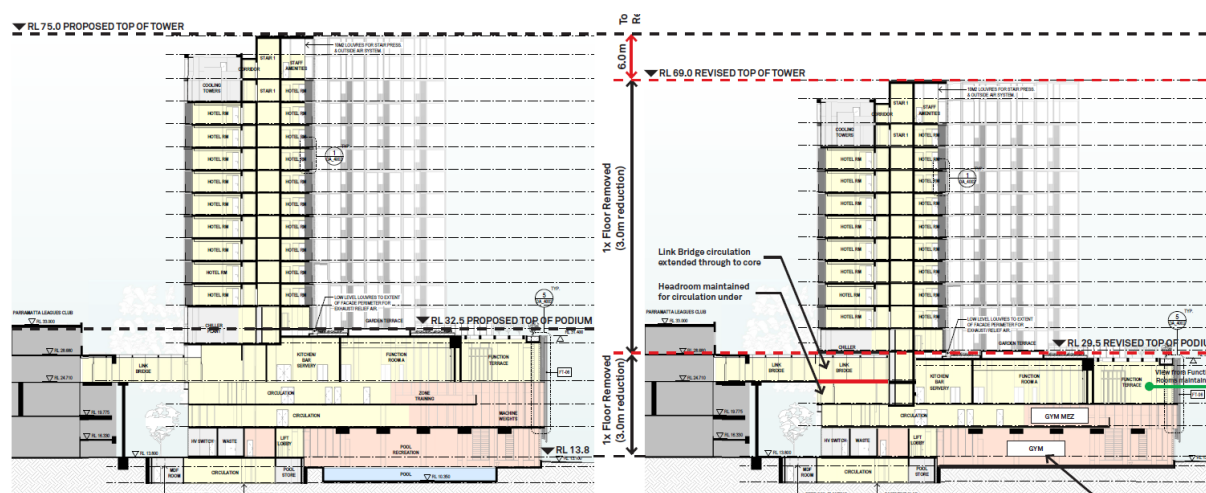
The impact to the surrounding area is addressed in the appended SoHVI by Purcell and the impact is concluded to not be significant (Appendix B).

## 6.1.2 Building Height, Surrounding Context and Visual Impact

### 6.1.2.1 Building Height

As previously outlined, the Building Height of the proposal has been reduced by 6m, equating to 2 storeys.

This has been achieved by deleting one level in the podium and one level in the hotel building above, with some consequential changes in floor-to-ceiling heights and plant rooms. This is illustrated below:



**Figure 11 – Height Reduction (Original DA and as revised, Hassell)**

While it is considered the proposed height and scale of the building as originally submitted was reasonable and appropriate, for all the reasons in the submitted EIS and associated appendices, the reduction in height was undertaken for the following three (3) main reasons:

1. To reduce the height of the building so it is within the overall tree canopy line from key vistas identified in Parramatta Development Control Plan 2011, "PDCP 2011", or "the DCP" (also being those referred to in the Conservation Agreement for Old Government House Domain, "OGHD").

As outlined in the previous section of this RtS, it is noted that the PDCP 2011 controls and Conservation Agreement do allow buildings to be above the tree line by 20% from key identified vistas. Despite this and the originally submitted proposal complying, the revised



proposal is now conservatively 95-100% below the tree canopy line from the nominated key vistas from OGHD (as calculated with accurate CAD measurements by the architects), despite the DCP control allowing 80% of the building to be below the tree-line. Essentially, as shown in the visual and heritage analysis, the building will be within the tree-line at the key nominated heritage DCP vistas.

2. To reasonably reduce the height and scale of the building, while remaining contextually appropriate and viable.

The reduction still provides a building which is appropriate for the site, provides all the benefits to the public domain and entry to Parramatta Park, retains an active interface with the surrounds, accommodates sporting teams and groups to support surrounding assets, infrastructure and the leisure/sports precinct, provides an appropriate proportional relationship between the podium and building above, all while reducing rooms and floorspace so it remains viable. No further reductions in height would be possible, as this would compromise the whole project proceeding, and then the associated benefits would be lost. The reduction in the podium height improves the proportional relationship between the podium and building above.

3. To reasonably respond to issues raised by the (then) NSW Office of Environment and Heritage (OEH), Council and the public.

Given a key concern raised in submissions related to building height and relationship with Parramatta Park, Old Government House and Domain and heritage items in the vicinity of the site (including the Nationally-listed Female Factory), concerns raised by the NSW Office of Environment and Heritage (OEH), Parramatta Council and other submissions, it was considered appropriate to include some meaningful reduction in building height in this RtS.

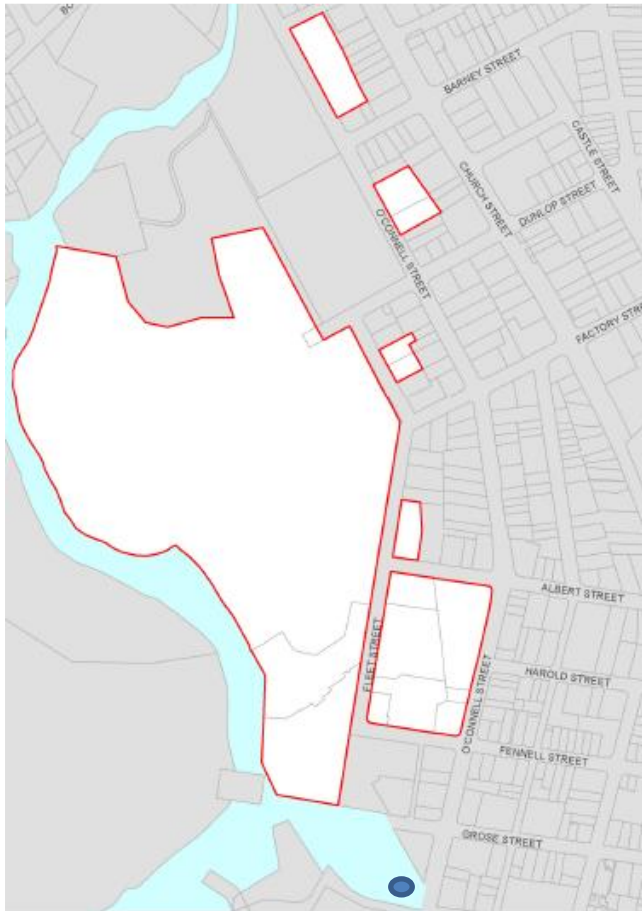
Prior to discussion of the visual impacts, some discussion of the context of surrounding planning controls is warranted, noting both DPIE and Parramatta Council ("Council") have requested the proposal be considered having regard to the adjacent height controls and the draft "Parramatta Growth Centre" (i.e. draft CBD Planning Proposal).

#### **6.1.2.2 Parramatta North Urban Transformation Area**

Prior to addressing the visual analysis, some commentary on the "Former Urban Growth towers" (also formerly known as Parramatta North Urban Transformation area, or "PNUT") is warranted. This is because many submissions refer to these controls no longer being proposed due to an announcement over 2 years ago regarding potential development by Sydney University.

This applies to the lands to the north and north-west of the proposed hotel site, which was subject to a State-led review by the former Urban Growth NSW (UGNSW, previously Urban Growth Development Corporation) and DPIE, revising the LEP zoning, height and FSR controls in 2015 and now part of PLEP 2011.

The sites are shown in red outline in the map below.



**Figure 12** – Former Parramatta North Urban Transformation Area (then UGDC), site blue dot

As background, in late 2018 (just prior to the DA lodgement), the NSW Premier made an announcement that the Government-owned sites at North Parramatta would be developed in "partnership". Extracts of the announcement are below (source: press release):

*The University of Sydney has partnered with the NSW Government to establish a second campus as part of a leading international health, education and research precinct in Western Sydney.*

*Premier Gladys Berejiklian said bringing the top-tier university to the heart of Western Sydney would attract more than 25,000 students and further drive its vision for a world-leading health and education precinct.*

*The NSW Government announced it would be working with The University of Sydney after a three-month market sounding process.*

*"The University of Sydney has the academic and reputational excellence to anchor this world-class education precinct, which will inspire and work hand-in-glove with co-located health facilities and ground-breaking medical research," Ms Berejiklian said.*

*"This will further support the NSW Government's vision for a world-class health and education precinct at the geographic heart of Sydney - fully integrated with the Parramatta Light Rail and Sydney Metro West, as well as medical, sports, arts and creative industries, and affordable housing."*

*New primary and high schools will also be included in the precinct planning.*

*Over the next 30 years, the NSW Government's vision for the precinct is expected to create more than 20,000 new jobs, inject more than \$13 billion to the NSW economy and generate \$3 billion in exports.*

*"The precinct will attract the best and brightest to Westmead and continue the jobs boom in Western Sydney," Ms Berejiklian said.*

*Health Minister Brad Hazzard said the NSW Government's \$1 billion Westmead Hospital Redevelopment – one of the biggest health projects in NSW – will transform health care in Western Sydney and beyond.*

*"When completed in 2020, Westmead Hospital will ensure Western Sydney's growing population continues to enjoy world-class health care close to home and will further boost jobs and pioneering medical research and education opportunities."*

*Vice-Chancellor of The University of Sydney, Dr Michael Spence AC, said the campus would have more than 25,000 students and 2500 staff by 2050 and provide affordable accommodation for key workers and students.*

*"Over the next 10 years, the campus would create 450 science and research jobs at the University and 3500 jobs in healthcare, education, biotechnology, manufacturing and other high-value industries. It will also enable hundreds of millions of dollars in third-party investment in local research and development," Dr Spence said.*

*Member for Parramatta Dr Geoff Lee said he was delighted with this vision for Western Sydney.*

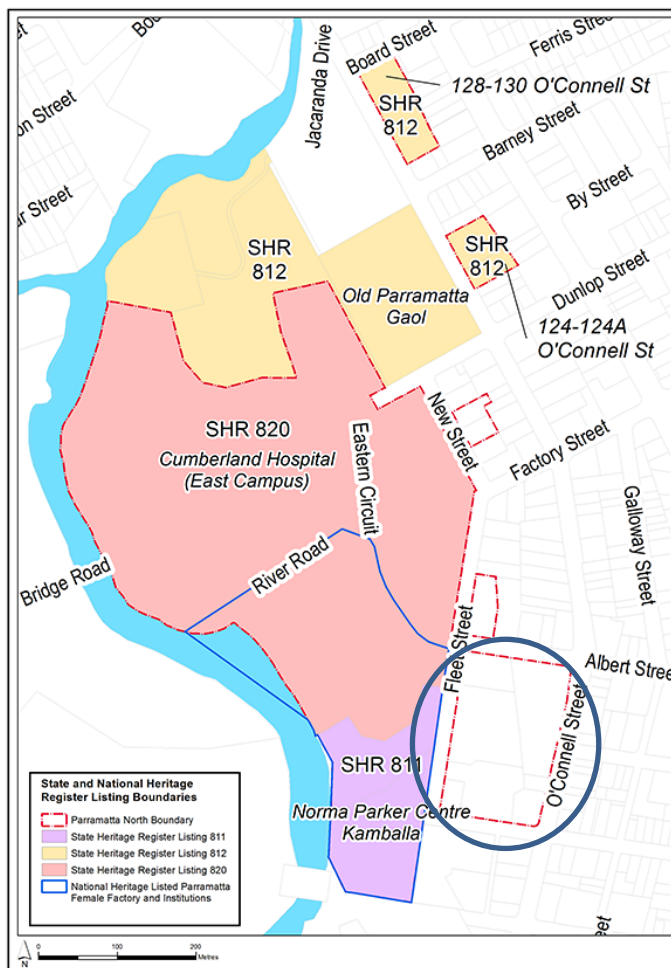
*"This will not just be a world-leading medical, education and innovation precinct, but it will create a wonderful, dynamic and vibrant place – a place that also preserves and showcases our heritage," Dr Lee said.*

*Health Infrastructure NSW and UrbanGrowth NSW Development Corporation will now jointly lead a 24-month exclusive negotiation period with the University and community feedback will be sought during the master planning process*

The key block for a (potential) visual interface in terms of the subject site is the block to the north of the hotel, fronting O'Connell Street, as this forms a backdrop from the key vistas in OGH. This does not have the same heritage restrictions as other sites to the west forming part of the Female Factory and Parramatta North Historic sites (and no doubt why the higher height limits were established).

This is illustrated in the figure below, showing that the block is outside the Federal Government listing of the "Female Factory".





**Figure 13 – Federal listing and Parramatta North site/block to the north of the proposed hotel**

Urban Growth Development Corporation NSW (UGDC) was formerly handling the precinct.

On 1 July 2019, UGDC was disbanded by the NSW Government and its functions transferred to Infrastructure NSW (INSW).

As at 5/2/2019 the INSW website listed various projects and precincts, including “the Cumberland Precinct” and the “Parramatta North Heritage Core Precinct”. In terms of the former, the INSW website previously stated:

*The NSW Government is negotiating with the University of Sydney to establish a new multi-disciplinary campus on the Cumberland Precinct at Parramatta North. Securing a world top 100 university as anchor institution will help transform the Westmead health and education precinct into a World Class Innovation District and create a connected, productive, sustainable, vibrant place to live and work...*

*Parts of Parramatta North and the Cumberland Hospital Precinct, the Cumberland Precinct, have been identified as the possible location of a new multi-disciplinary university campus, supported with complementary innovation and commercial uses, student and key worker accommodation, a new K-12 school and retail and community*

*uses. Protecting the sites extraordinary history and environment is integral to the to creating a vibrant new precinct...*

*Negotiations with the University of Sydney as anchor institution are progressing as planned. This process began in November 2018 and is expected to take 24 months to complete.*

#### PROJECT STATUS

*The NSW Government is negotiating with the University over the next two years to ensure the Cumberland Precinct is a connected, productive, sustainable, vibrant place to live and work with all the features of a world leading health, education and innovation precinct*

However, **it is noted that this Project no longer appears on the INSW website** (as at 28/11/2021).

The following key observations are made:

1. The project no longer appears on the INSW website (in either "Projects" or "Industry" sections).
2. The previous announcements were not accompanied by any plans or mechanisms that have any statutory weight at this stage.
3. The current planning controls applying to the site and blocks to the north have not been changed.
4. There is no apparent draft Planning Proposal to change the planning controls to the north of the subject site, and no known resolution for a Planning Proposal to be prepared, other than the City Centre proposal, which does not apply to the site(s).
5. The sites with higher heights and FSRs to the north of the hotel site are outside the heritage core.
6. If the precinct is to be developed by Sydney University in the future, it is relatively common for universities to include tall buildings, particularly for student housing, whose floorplates are typically smaller than buildings for teaching spaces. It is also conceivable that some form of student housing may be pursued by the University in the future, particularly for the block(s) to the east of the heritage core, to the north of the proposed hotel, which does not have the same heritage restrictions as other land in the precinct.
7. Any changes are far from certain or imminent. It is understood a Masterplan was previously intended, although the outcome of this, let alone the planning controls, is not known at this stage.
8. It cannot be assumed that the current planning controls for either FSR or height, as applicable under PLEP 2011, will change. This is apart from the current Planning Proposal for the CBD, addressed below.
9. It is also acknowledged that it cannot be assumed development of the sites to the north of the sites to the maximum height and FSR will occur. Further, assumed envelopes may not represent potential development, and this may occur over an extended period, or not at all. Therefore, it is also appropriate to consider visual modelling without potential future buildings.

So, the existing height limits in Parramatta LEP 2011 as they currently apply (with no Planning Proposal or Masterplan applying to this land) have been modelled in the visual analysis, as possible future building envelopes within the visual analysis. However, the proposal is also shown without these possible future building envelopes in the visual analysis, and the analysis and justification does not rely on these buildings occurring.

#### **6.1.2.3 Draft City Centre ("CBD") Planning Proposal**

There are two relevant matters regarding this draft Planning Proposal:

1. The facts regarding proposed changes to core planning controls that regulate height and bulk around the subject site (as this may affect the future surrounding context); and
2. The weight to be given to this draft Planning Proposal.

These matters are addressed in turn.

Some key summary facts are outlined below:

1. The draft Planning Proposal ("PP") does not make any changes to the land subject of the DA.
2. The draft PP does not apply to, nor change the controls applying to the "Parramatta North" area (the former Parramatta North Urban Transformation Redevelopment addressed previously), only to blocks to the east and north-east/south-east of the site.
3. In regard to the OGHDA area and the subject site, Council's website states *"The Parramatta CBD Planning Proposal intends to preserve ('grandfather') existing controls applying to land within the Park Edge Highly Sensitive Area and Parramatta Park. This is not subject to any changes under this Planning Proposal"*;
4. The planning controls immediately to the south and east of the site (i.e. across O'Connell Street) do not change in terms of key FSR and height standards, from what could be ascertained from the draft maps.
5. However, there are significant changes proposed to the height and FSR standards two blocks to the east of the site, along Marsden Street, as potential additional "incentive" FSR and Height (addressed further below).
6. The subject hotel DA did not and does not rely on the planning controls to the immediate east and south of the site to justify the proposal and in any event, they are either not changed by the draft PP, or allow much greater height and FSR in blocks further to the east in the visual backdrop to the hotel from OGHDA.
7. The key heritage vistas are located at varying distances from the hotel, but all of such distance that the surrounding buildings (existing and potential future) would be visible and therefore relevant.

As background, the City Centre draft Planning Proposal was in preparation for over 3 years, mostly between 2016-2018.

The draft Planning Proposal has now been publicly exhibited and this concluded on 3 November 2020. As the Planning Proposal has been exhibited, it is a relevant consideration under Section 4.15 of the Environmental Planning and Assessment Act 1979.

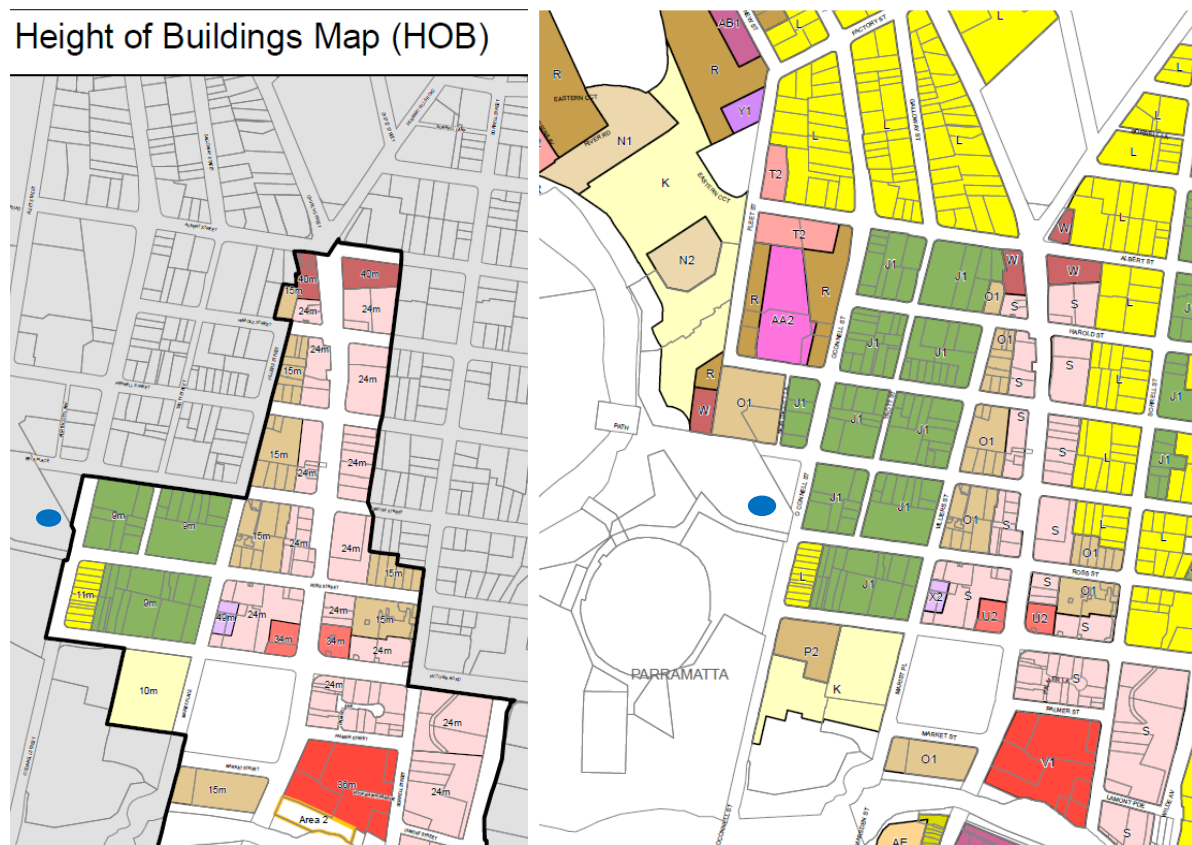
On 15 June 2021, Council resolved to approve the Parramatta CBD Planning Proposal with some minor changes and forward it to the Department of Planning, Industry and Environment (DPIE) for finalisation.

A comparison of existing height and FSR against those in the draft CBD PP is provided below.

### Height comparison

The following map extracts show the proposed and existing Building Height controls around the site. These have been checked for all the blocks to the immediate east, south-east and north-east of the hotel site (which is shown by a blue dot) across O'Connell Street and the proposed draft heights appear the same as the current PLEP 2011.

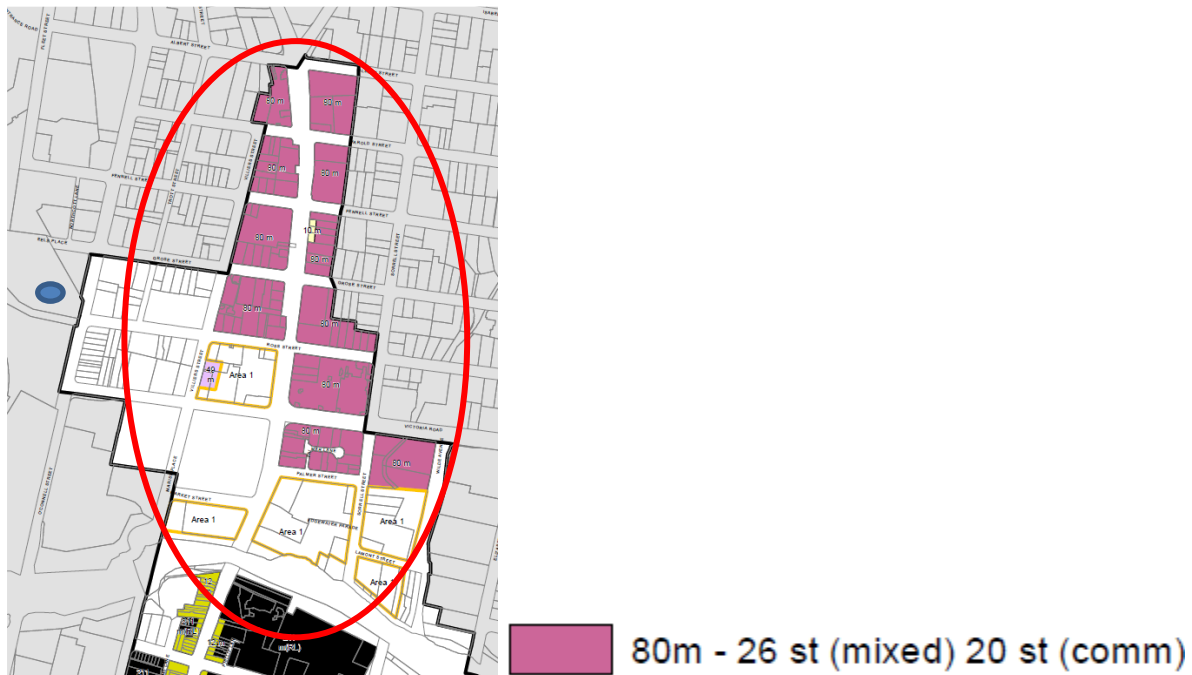
However, there are significant changes to height changing from 9m to **up to 80m**, two blocks to the east, along Marsden Street.



**Figure 14** – Comparison of proposed and existing draft height standard (existing on right) – also see Figure 15 for incentive/bonus height

As mentioned, there are height incentive controls that allow height to **80m** two blocks to the east of the subject site, along Marsden Street, subject to certain criteria being met. This will potentially significantly increase the height of buildings in the backdrop behind the subject site, as viewed from OGH and vistas from the south and west of the site.

These incentive height controls in the draft CBD PP are shown in the map extract below.



**Figure 15** – Proposed bonus height provisions in draft City Centre Planning Proposal

As shown, these blocks in purple above allow potentially 80m buildings (equating to 20-26 storeys, depending on uses and ceiling heights).

The achievement of this additional height (and FSR addressed below) is subject to certain criteria being met, including site size and site frontage. These site criteria have been considered in the potential building envelopes included in the visual analysis by Hassell (Appendix A).

#### Floor Space Ratio (FSR) comparison

The following map extracts show the proposed and existing FSR standards. These have been checked for all the blocks to the immediate east, south-east and north-east of the hotel site (shown by a blue dot).

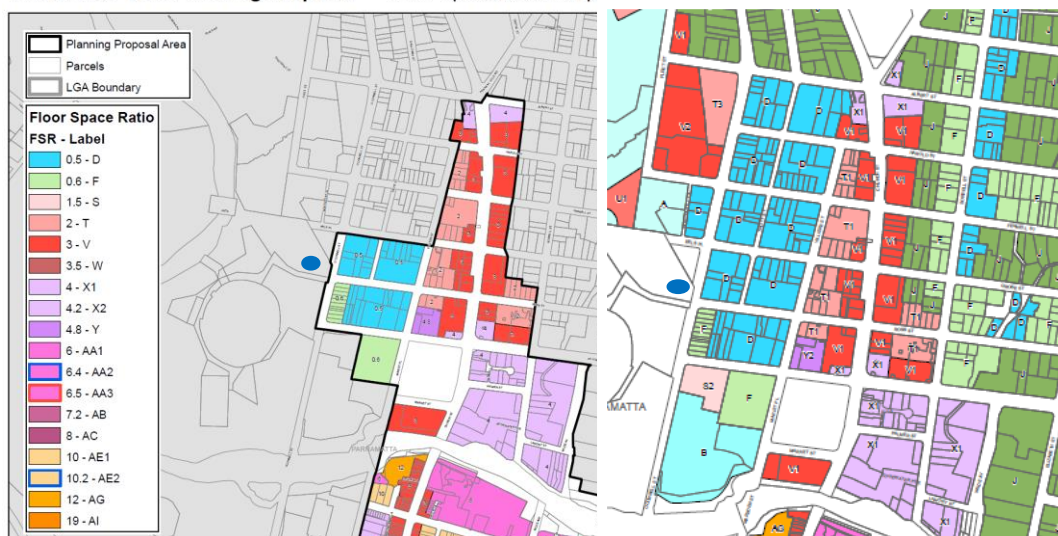
The FSRs in the draft PP appear the same as the current PLEP 2011 directly opposite the site along O'Connell Street.

However, like for the proposed height controls, there are "incentive" or "bonus" FSR controls up to an additional 6:1 two blocks to the east, along Marsden Street. Along with the height controls and potential additional height, this is likely to significantly increase the height of buildings in the backdrop behind the subject site over time, as viewed from OGHD, if the Planning Proposal proceeds as exhibited.

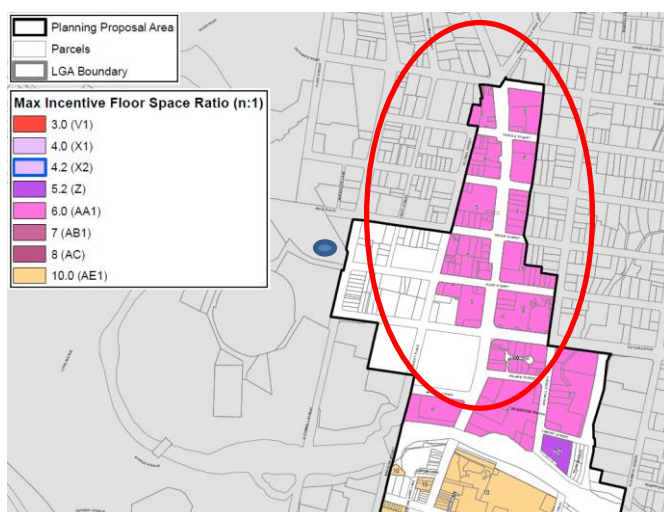
This is shown in the map extracts below.



**Parramatta CBD Planning Proposal — Floor Space Ratio Map**



**Figure 16** – Comparison of proposed and existing draft FSR standard (existing on right)



**Figure 17** – Proposed bonus FSR provisions in draft City Centre Planning Proposal

The draft Planning Proposal is a relevant consideration and will become more certain and imminent in the coming months.

While not reliant on the potential future surrounding buildings, the proposed higher FSRs and heights two blocks north and east of the site provide further support for the proposal and particularly the issue of a building 600-800m away from the OGHV vistas, whereby such future likely buildings would be visible in the distance from the heritage precinct. This is why they have been conceptually modelled, although the proposal is also shown without such envelopes for consideration, as they are potential, not certain.

It is also noted Parramatta is the “Second CBD” for Sydney and controls to support growth (such as bonus heights and FSRs) are likely in some form. Parramatta and western Sydney is a key focus of future strategic planning documents by the local and State Government guiding growth for the next 15-35 years.

Parramatta is a critical CBD for Sydney's future planned growth and any position or opinion that no buildings should be visible from any vistas in OGHD is untenable and unrealistic, and is not supported at all by the planning controls (which supports some limited visibility, even from the most important vistas). It is also not supported by the existing situation, where there are buildings 600m-1km from various vistas that are visible in the distance, as shown by the visual modelling. If a stance that no building should be visible from any existing vistas within heritage precincts is held, this would thwart State and local planning objectives and the State's own guiding planning documents to support Sydney's growth in a managed and sustainable way, and the existing planning controls.

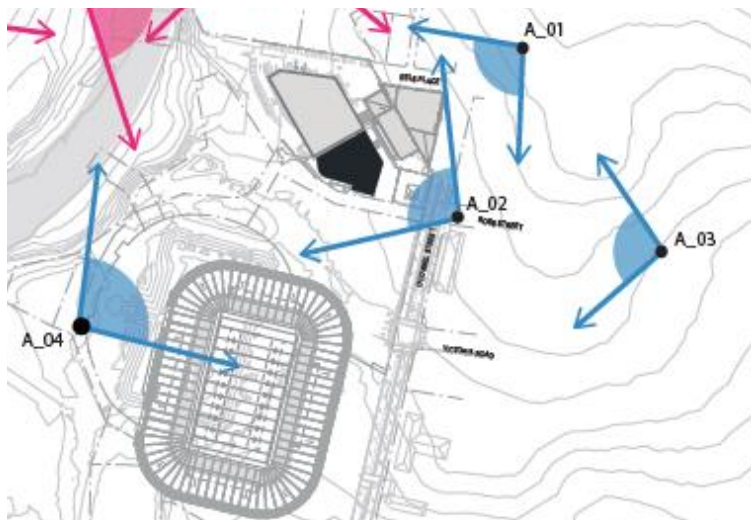
This does not mean that the proposal "compromises" outcomes from OGHD, as the proposed building is essentially within the tree-line (and well below the height allowed under the DCP) from key identified vistas.

#### 6.1.2.4 Views (Urban Context)

Comprehensive view/visual modelling was also undertaken around the site regarding the proposal (original and revised), both in response to the heritage and urban setting, having regard to the requests by DPIE, OEH and the statutory setting of the site/proposal.

The heritage considerations were summarised in the previous section and are addressed within the attached SoHVI by Purcell (Appendix B), which should be relied upon for heritage assessment and justification.

In terms of the urban setting and urban visual impacts, additional visual modelling and analysis was undertaken from 4 key surrounding vistas, as shown in the legend below (blue arrows):



**Figure 18 – Urban Vistas (blue) to the site/proposal (Hassell)**

As shown above, additional urban vistas were done from the carpark area to the S-W of the hotel, in the context of the adjoining stadium and from the south, east and north-east, within a CBD context.

Extracts of the visual analysis of these 4 vistas are provided below (without LEP height limit potential buildings to the north of CBD Planning proposal buildings to the east), as montaged by Hassell, with the full report by Hassell contained in Appendix A:



**Figure 19** – Additional urban vistas (by Hassell)



**Figure 20** – Additional urban vistas (by Hassell)

These vistas show a contextually appropriate building (with or without considering potential buildings to the north). The reduction and mitigation of visual impact is aided by the significant setback to O'Connell Street (around 40m), street trees and the surrounding built form, including Parramatta Leagues Club and adjoining Parramatta Stadium.

The visibility is greatest in the area around the Stadium to the south. However, the height of the Stadium (at approximately 10 storeys) and the size of that building is not incongruous with the proposed building.

It should be noted that the original height was supported by the Independent Design Excellence Panel prior to lodgement. This was after a long and detailed iterative review, including 3 formal meetings, over 4 months. This Panel included representatives from the NSW Office of Government Architect, Parramatta Council (being the qualified and well-respected City Architect) and an independent well-respected architect (Tony Caro). The minutes from that DEP are included at Appendix E1 of the EIS.

It is noted the Design Excellence Panel ("DEP") was of the view the proposed massing and height was contextually appropriate. The building has since been reduced by two floors.



Specifically, the DEP provided the following general comments:

1. *The proposed height and skyline articulation is commended and supported.*
2. *The development of a hotel in this location is also supported and elements such as the training pool, gym and roof top bar are all seen as positive attributes.*
3. *Generally, the proposal is developing well and has the support of the panel to proceed to the DA stage. The Department of Planning reserve the right to have this project seen by the State Design Review Panel at their request.*
4. *All concerns of the DRP as raised through the process of review have been adequately addressed.*
5. *Development of the design of the function room on the roof terrace can be resolved by the architects in line with the criteria above*

These comments can be read to support the proposal in its urban context, which is supported by the analysis lodged with the DA and RtS.

As previously mentioned, the height was reduced despite the support from the DEP, for the following reasons:

1. To reduce the height of the building so it is within the overall tree canopy line from key vistas identified in Parramatta Development Control Plan 2011, (also being those referred to in the Conservation Agreement for Old Government House Domain, "OGHD").
2. To reasonably reduce the height and scale of the building, while remaining contextually appropriate and viable.
3. To reasonably respond to issues raised by the (then) NSW Office of Environment and Heritage (OEH), Council and the public.

### **6.1.3 Access, Traffic, Bicycles and Parking**

There have been four (4) notable changes to the proposal that necessitate a re-examination of the traffic, access and parking impacts of the proposed development:

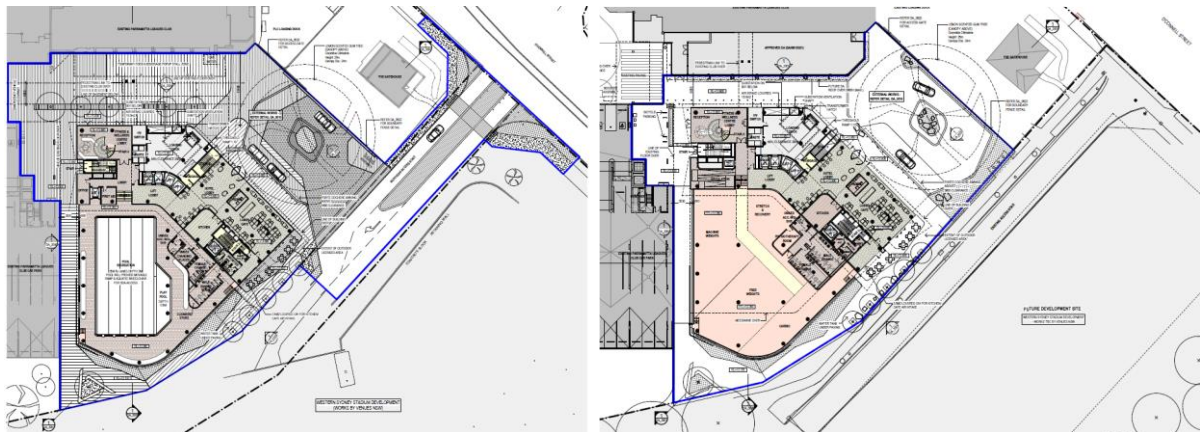
1. A reduction in floorspace of 2,114sqm, or approximately 15.5% of total floorspace, including reduction of 19 rooms, removal of a pool and reduced function space, with a consequential related reduction in traffic generation and parking demand;
2. Change in vehicular access to and from the site, from the previous southern access across Venues NSW land associated with Parramatta Stadium, to all vehicular access to and from Eels Place, to the west;
3. Development approval of an extension to the Parramatta Leagues Club building to the immediate north of the site, at ground level, adjoining the accessway and loading access to the site and Club; and

4. Completion of the Stadium on the adjoining site and securing a copy of the Event Management Plan for that site.

There have also been comments received from road authorities to the original DA, including Transport for NSW (TfNSW), the former Roads and Maritime Services (RMS), now absorbed into TfNSW, and Parramatta City Council.

In terms of the reduction in floorspace, this has been detailed in Part 4.2 of this RtS and a breakdown is provided in the revised plans by Hassell (Appendix A).

In terms of the access to and from the site, the proposal no longer relies on access over Venues NSW land to the south. All vehicular access is now from Eels Place. This is shown in the “before and after” floor plans below.

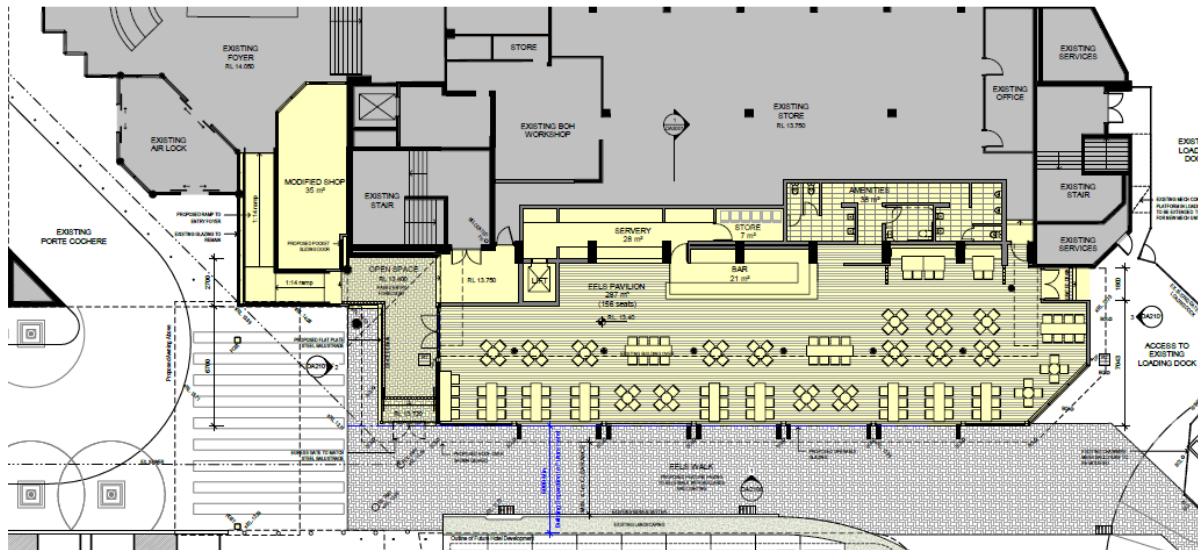


**Figure 21** – Ground Floor and Access (Original DA and as revised, Hassell)

The combination in the reduced development yield and the access changes alters the generation and distribution of traffic to and from the site. This has been reviewed and analysed in the updated report by TTPP, contained at Appendix E of this RtS.

The development approval for a ground floor addition to the south of the existing Parramatta Leagues Club (and the north of the proposed hotel building) was issued by Parramatta City Council on 6 October 2021 (DA/681/202), as depicted below:





**Figure 22** – Recently-approved ground floor addition to Parramatta Leagues Club to the north

The adjoining Parramatta Stadium was completed after lodgement of the EIS. The Event Management Operation Plan for that site was under review and finalisation for some time after completion of the adjoining stadium, for understandable reasons to gauge operations, and this was one of the reasons for the delay between exhibition and this RtS.

The subject proposal has been reviewed in light of the management of events at the adjoining Stadium, and this is detailed in the latest appended report by TPPP (RtS, Appendix E).

A summary of associated issues is below, although the detailed report by TPPP should be the primary source of detailed analysis.

#### 6.1.3.1 Traffic

The revised traffic generation assessment utilised the same assumed traffic generation rates as in the EIS assessment (by floorspace or other metric), to allow a like-for-like comparison, although also accounting for changes in traffic distribution from the changed access.

The reduction in development yield results in a reduction of 28 vehicular trips in the morning peak hour and a reduction of 52 vehicular trips in the afternoon peak hour period.

The operation of key intersections has been reassessed (including accounting for “with Parramatta Light Rail” scenarios) using SIDRA “Intersection 8” Network analysis, a commonly-used and accepted software tool for intersection analysis, including:

- Eels Place/ O'Connell Street/ Grose Street intersection; and
- Victoria Road/ O'Connell Street intersection.

The analysis by TPPP shows “the anticipated Level of Service for the modelled intersections will be same with and without the proposed Hotel development once the Parramatta Light Rail is operational” (pg. 21). It is possible to achieve some improvements to the Eels Place/O'Connell

Street intersection, to improve the Level of Service ("LoS") from D to C, with phasing. However, as pointed out by TfNSW, signal phasing is a matter for that authority.

The analysis also shows that queue lengths for the proposal will not affect any surrounding roads.

There were issues raised previously by TfNSW and Council regarding a proposed intersection at the corner of the southern access road and O'Connell Street, and its design. However, with the removal of this access from the proposal with the RtS, this issue is resolved. All access is now via an existing signalised intersection, being Eels Place/O'Connell Street.

A Green Travel Plan is proposed, and this is supported by Parramatta City Council. The development and implementation of this Plan can be secured through a condition of consent.

More recently email feedback of a previous draft by TfNSW (12 Nov 2021) has also been addressed in the updated report by TTPP (pg. 38) as well as previous consultation.

#### **6.1.3.2 Event Mode, Loading and Internal Access**

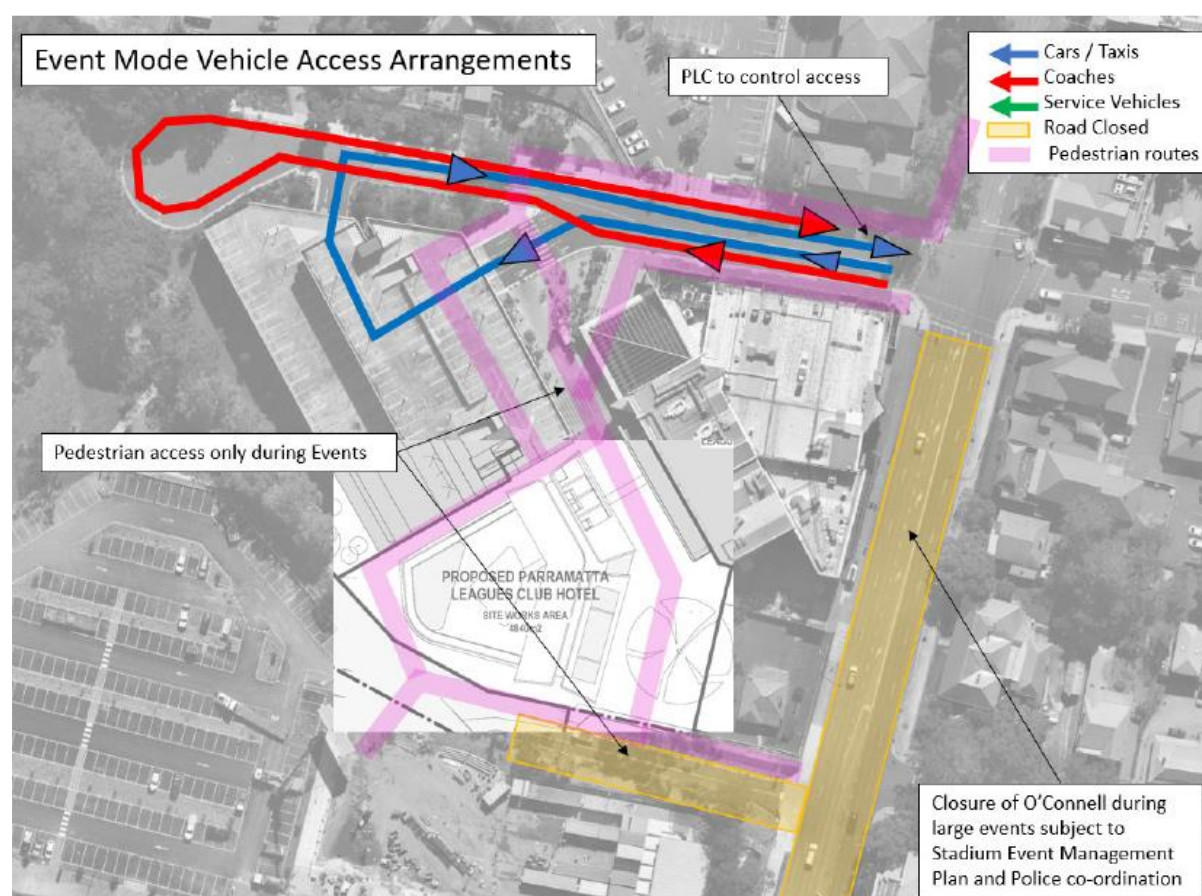
The approved layout of recent DA for a club extension has been included in the floor plans and public domain plans by Hassell, and in the analysis by TTPP, as appended. It does make the access narrower to the north, although manageable, particularly noting the relatively infrequent use of the club/hotel servicing area and the availability of parking and drop-off both in the adjoining carpark to the west, and Eels place for buses/coaches.

The revised development proposal has responded to the current traffic and pedestrian management measures implemented during events at the adjoining Stadium. Specifically, this includes measures when O'Connell Street is closed to traffic between Eels Place and George Street and / or vehicle access to the Stadium car parks is closed.

Buses and coaches will use Eels Place.

The "Event Mode" essentially involves pick-up and drop-off at Eels Place and use of the adjoining Club 4-7 storey carpark, with "pedestrian only" access within the site, east of the adjoining carpark. This is essentially what occurs currently during events and is shown in the following diagram:





**Figure 23** – Access to and from the site during “Event Mode”

The loading demand and practical use of the existing loading dock for the Parramatta Leagues Club (to the immediate north-east), and the loading for the hotel, has been analysed by both reviewing the largest vehicles used (12.5m) and turning swept paths to meet Australian Standards (TTPP, Appendix D of that report). This is included in the updated report by TTPP (RtS, Appendix E), showing the proposal meets Australian Standards.

To ensure appropriate management, a Preliminary Loading Management Plan is provided with the updated report by TTPP appended to this RtS.

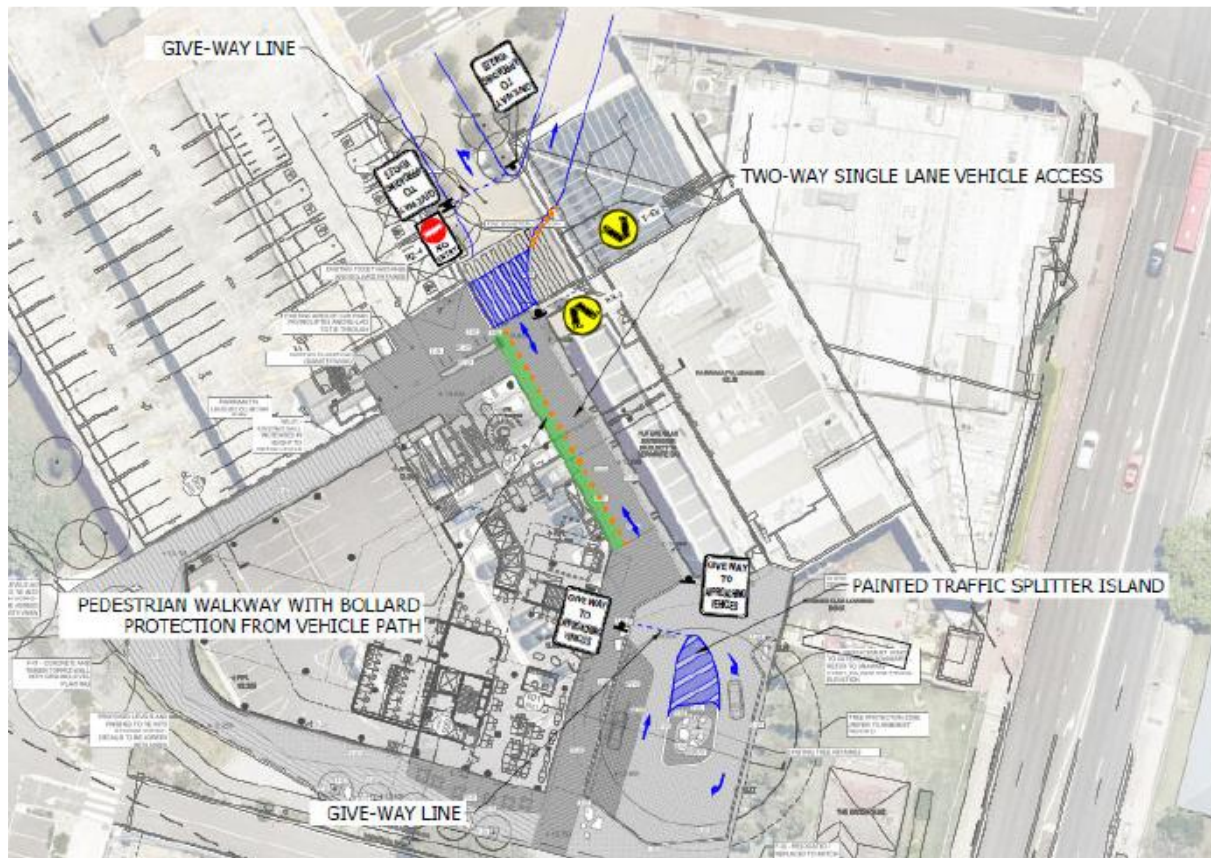
### 6.1.3.3 Pedestrians, Bicycle Facilities and Planning

The following diagram shows the pedestrian network within the site, which is logical and links with the adjoining assets of Parramatta Park and Parramatta Stadium.



The proposed strong pedestrian linkages through the site will create pedestrian-friendly and prioritised pathways. This will be augmented through the different pavement types, kerbing, landscaping and physical barriers. The pedestrian pathways follow the key pedestrian desire lines to reduce potential use of alternate (or more direct) routes. This is shown in the figure below:





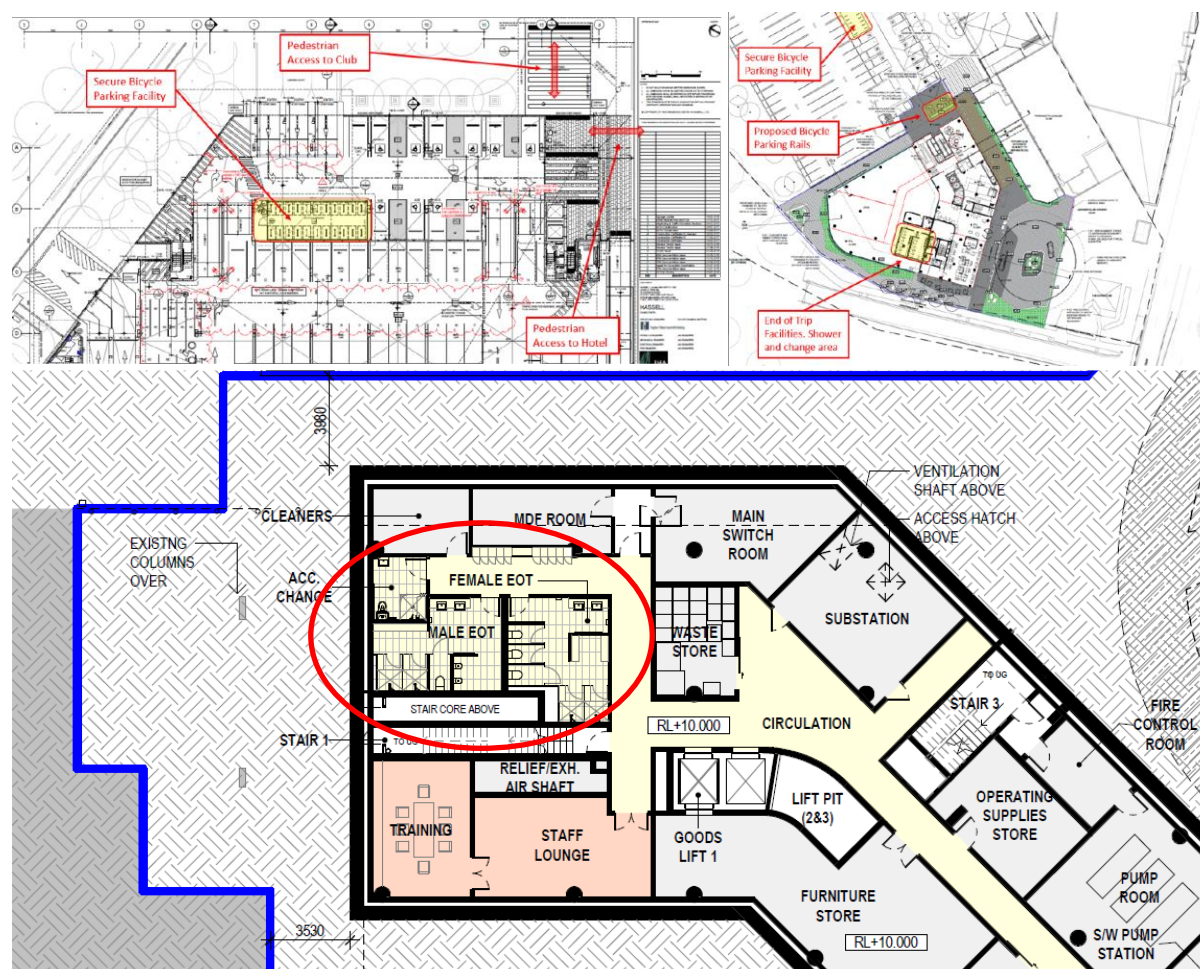
**Figure 25** – Pedestrian prioritisation (Hassell)

The proposed arrangements are similar to a “shared zone” environment with low traffic volumes and vehicle speeds interacting with pedestrians (although noting this is not a public road, but an accessway within a site).

In terms of bicycle parking and facilities, it is noted:

- The change in access reduces potential to affect or compromise any bicycle use or bike-ways along O’Connell Street, by the removal of a previously-proposed new intersection design;
- An additional 8 publicly accessible bicycle rails are included with the revised DA;
- There are an additional 44 secure bicycle parking spaces in the immediately-adjointing carpark (as currently exist, including foreseeing potential development of the subject site);
- There are “end of trip” facilities (change areas and shower) for staff within the basement (as well as further change and shower areas in the gym), as shown on the plans by Hassell, extracted below:

The bicycle parking within the adjoining carpark and the end of trip facilities are shown below:



**Figure 26** – Parking and End of Trip facilities (Hassell)

#### 6.1.3.4 Parking

The theoretical parking demand has reduced by 167 spaces due to the changes to the proposal in the RtS (Appendix E, TTPP, pg. 16). The existing large carpark immediately adjoining the proposed hotel, to the west, has capacity for 773 spaces and this fully meets the combined parking demand for the existing Club and hotel (being 644 spaces). There is some loss of existing at-grade parking on site by the development of the hotel, although this is not critical given this supply (94) is less than the difference in supply and demand parking supply provided.

As pointed out by TTPP, parking on site within the multi storey car park would be unallocated, allowing co-utilisation of the same spaces by different uses at different times of the day, thereby reducing the total site parking demands compared to separate uses being allocated individual spaces.

The location of the parking to the immediate west also “frees up” the public domain around the proposed hotel to pedestrians and bicycles, with wider benefits to the park precinct and during busier event days at the adjoining Stadium compared to the current situation.



#### **6.1.3.5 Light Rail and Construction Impacts**

TTPP undertook consultation with TfNSW and the Parramatta Light Rail (PLR) delivery team to confirm the future road network conditions surrounding the Parramatta Leagues Club site once the Parramatta Light Rail ("PLR") project is operational. This included assumed traffic flows and capacity from George Street changes, meaning O'Connell Street will become the principal north-south traffic route accessing the western side of the Parramatta CBD.

It is also noted that the Parramatta Light Rail is planned to be completed and operational prior to the construction and/or operation of the proposed Parramatta Leagues Club Hotel development.

The attached updated Traffic and Parking report (Appendix E) addresses potential impact of the proposal on Parramatta Light Rail (Stage 1) – see Parts 3.1 and 3.2 of TTPP's report. As previously mentioned, the operation of key intersections will not be altered in terms of Level of Service from the proposal after completion of the PLR project, with minimal and acceptable impacts.

TfNSW (and then RMS) has recommended a detailed condition of consent regarding a Construction Traffic Management Plan and it is appropriate to impose a condition requiring such a plan, which is also common practice.

#### **6.1.3.6 Summary**

A summary response to comments from roads authorities is included in the previous Section 5 of this RtS. A response is also provided in tabular form within the updated traffic and parking assessment by TTPP at Appendix E of this RtS, commencing on page 36.

Overall, the revised proposal provides an appropriate access solution for the use, the site and precinct for all forms of users, with logical and appropriate parking provision, and adaptability in event mode to complement the adjoining stadium. The pedestrian environment and use and activation of the public domain around the site will be significantly improved by the proposal, despite some anticipated increase in traffic.

In overall conclusion relating to access, traffic and parking, TTP finds:

*it is concluded that the modified development proposal for the Parramatta Leagues Club Hotel has responded to submissions in a manner which provides an improved outcome for the site and the surrounds.*

*Specifically, the revised modifications to the vehicle access arrangements where all vehicles accessing the site will be off Eels Place addresses both non-event and event periods for the precinct. The modified development vehicle access arrangements are consistent with the preferred access arrangements as set out in the submissions by TfNSW (and then RMS) and Parramatta City Council.*

*However, careful management of vehicles and pedestrians generated by the Hotel site and the precinct generally will need to be implemented, maintained, reviewed*

*and adjusted over time to ensure that implemented management measures continue to address the changing nature of the use of the precinct.*

*With regard to the proposed Hotel, this would include:*

- *Preparation of an Event Management Plan in consultation with Venues NSW.*
- *Preparation of and maintaining a detailed Loading Management Plan; and*
- *Preparation of and maintaining a Hotel Travel Plan (and Travel Access Guide).*

#### **6.1.4 Archaeology**

Archaeological testing has previously occurred on the site, as outlined in the Archaeological Assessment forming part of the EIS (EIS, Appendix H, Austral).

In terms of aboriginal cultural heritage, the site is highly disturbed (being a bitumen carpark). Based on data (including 22 excavation sites across both sites and 5 on the small subject site), Austral Archaeology have been able to conclude that the site does not contain any Aboriginal cultural material. Due to this, consultation with Aboriginal people was not required. No Aboriginal material was found during excavation and construction of the adjoining carpark (closer to the river with higher potential artefacts than the subject site). However, recommendations are made in the archaeological report about archaeological supervision and protocols and requirements regarding any unexpected finds.

NSW (then) OEH did request additional testing regarding a possible early footing associated with the former gatehouse, as identified in the original archaeological assessment by Austral Archaeology. In this regard, further detailed testing has occurred with a large "L" shaped trench to search for potential footings (in September and October 2021), as outlined in the updated report by Austral (RtS, Appendix E).

The area of interest and further testing covered a wide area of approximately 25sqm, as shown below:



**Figure 27** – Further testing location and photo (Austral)

The updated report by Austral concludes:

*In summary; no archaeological evidence relating to the Mud Lodge was identified in within the trenches. The entirety of the study area has therefore been re-zoned as having low archaeological potential. The trench contexts show that the carpark and roadbase are located on top of the natural clay and that construction of the carpark is likely to have stripped away any historical above ground deposits. Although there was the presence of a burnt tree root, it was unclear whether this was associated with previous land clearing activities or ground preparation prior to construction of the current carpark.*

*Where the original HAA and the response received from Heritage NSW identified a need to undertake archaeological testing to determine whether the proposed works would impact on archaeological material, this testing program has now been completed. The lack of archaeological remains relating to the Mud Lodge now means that it is confirmed that the development will not impact on archaeological remains of State or local significance.*

*The assessment of significance in the HAA revolves around the potential for archaeological remains being present which are associated with the Mud Lodge. The archaeological testing demonstrated that the study area does not contain any archaeological material. As a result, the archaeological potential has been redefined and the following recommendations apply to the project in regard to historical archaeological material*

The recommendation made in the updated archaeological assessment is:

*In the event that historical archaeological relics not assessed or anticipated by this report are found during the works, all works in the immediate vicinity are to cease immediately and Heritage NSW be notified in accordance with Section 146 of the NSW Heritage Act 1977. A qualified archaeologist should be contacted to assess the situation and consult with Heritage NSW regarding the most appropriate course of action.*

This is a relatively standard condition able to be placed on a DA consent.

In terms of broader issues regarding Aboriginal heritage, Parramatta Leagues Club has a commitment to inclusivity and recognition of the important and continuing contributions of Aboriginal people to the region. In consultation with the community, the Club could consider opportunities to reflect this through use of local language, public art, or commitment to employment targets during construction etc (as mandated for major government projects).

#### **6.1.5 Biodiversity**

The biodiversity issues raised by NSW OEH have been addressed by Cumberland Ecology. This is in the form of an updated BDAR, which has been provided in both clean and track changes, as requested by NSW OEH and to make assessment easier, as contained in Appendix C. The updated report also addresses the most recent legislation and guidelines.

A summary response to issues raised by NSW OEH is included in the previous section of this RtS. The updated report includes proposed mitigation measures regarding:

- replacement planting;
- dust management;
- noise management;
- light spill management;
- bird collision management;
- GHFF monitoring;
- adaptive management strategies;
- stop work triggers;
- habitat improvement and other matters.

The updated report also addresses issues raised by Council regarding lighting and potential collisions of birds.

The updated BDAR report concludes:

*With the implementation of the proposed mitigation measures and the offsetting described previously, it is considered that the impacts of this project on biodiversity, in particular the Grey-headed Flying Fox, will be minimal and can be appropriately managed,*

Mitigation measures are able to be addressed by conditions of consent including adopting the findings, recommendations and strategies outlined in the updated report by Cumberland Ecology, and conditions recommended by (then) OEH.

#### **6.1.6 E.S.D./Sustainability**

The following table outlines a response to ESD initiatives and aspects to be delivered as contained in the original ESD report.

<b>ESD Measure (From JHA Report with EIS)</b>	<b>Response</b>
Use insulated thermal mass.	The structure is concrete with insulation, which has a high thermal mass.
Use high insulation levels.	The specification and location of insulation will comply with NCC JV3 Assessment requirements for Energy Performance. This will be addressed at detailed design stage.

<b>ESD Measure (From JHA Report with EIS)</b>	<b>Response</b>
Maximise solar access in winter.	Operable integrated shading has been specified to the majority of the façade to provide opportunity to maximise solar access in winter Refer FT01-A and FT01-B on DA4000.
Focus attention on shading performance east and west glazing.	As above.
Consider double glazing in areas with higher heating needs.	Certification of the building works will be subject to demonstrated compliance with the NCC2019 Energy Efficiency Provisions of Section J, including J2: External Glazing. High performance DGUs have been specified as the base typical façade modules to all mixed mode/conditioned internal zones. Refer DA4000
Consider passive solar heating.	Operable integrated shading has been specified to the extent of the façade to occupied floors to provide opportunity to prevent solar heat gain in the summer and harvest solar access in winter.
Consider cross ventilation to achieve cooling comfort.	Opportunity for cross ventilation has been incorporated. The central circulation common area to every hotel floor and the gym on the ground have been provided with operable louvred glazing to multiple sides of the facade perimeter.
Use convective ventilation and circulation.	Not specified or considered necessary due to ventilation provided.
Use airlock entries to minimise infiltration.	Automated revolving doors are provided to the hotel entry at ground level. Self-closing doors to the façade openings to external zones will be reviewed in detailed design stage.
Building fabric will comply with the minimum NCC 2019 performance requirements.	Certification of the building works will be subject to demonstrated compliance with the NCC2019 Energy Efficiency Provisions of Section J, including J1: Building Fabric.
Glazing will comply with the minimum NCC 2019 performance requirements.	As above, including J2: External Glazing.
Air infiltration will comply with the minimum NCC 2019 performance requirements.	As above, including J3: Building Sealing.
JV3 Modelling should be conducted to optimise maximum walls-glazing requirements.	Certification of the building works will be subject to compliance with the NCC2019 Energy Efficiency Provisions of Section J, which require JV3 modelling to be completed.

<b>ESD Measure (From JHA Report with EIS)</b>	<b>Response</b>
Green walls should be considered throughout the development.	Included - see plans details (Hassell) with green wall climbers shown to hotel room balconies.
Green roof(s) should be considered.	See Hassell plans showing a green roof to the podium.
East, North and West glazing should be shaded acceptable to optimise passive solar design.	Operable integrated shading has been specified to the majority of the façade to maximise opportunities to reduce solar heat gain.
Passive solar heating and passive cooling should be optimised throughout the development.	As above. Fixed external shading is provided to western perimeter of the podium levels. A high-performance facade system has been specified throughout. Air movement has been optimised by provision of operable glazing. Internal heat gain will be minimised via energy efficient lighting and appliance selection, which will be addressed at detailed design stage.
Passive Ventilation strategies should be optimised throughout the common areas in the development.	The central circulation common area to every hotel floor and the gym area on ground have been provided with operable louvred glazing to the facade perimeter.
Single sided ventilation should be optimised in hotel bed rooms.	Every hotel room is provided with an operable door panel.
Dynamic simulation should be conducted to determine if natural ventilation will provide adequate thermal comfort for occupants.	This will be included at detailed design stage.
Natural ventilation should be the optimised where possible to improve IAQ.	Natural ventilation has been optimised throughout. Every hotel room is provided with an operable door panel. The central circulation common area to every hotel floor and the gym ground have been provided with operable louvred glazing to the facade perimeter.
IAQ should be monitored and controlled by CO2 and/or flow rate controls.	This will be monitored as per the recommendations in the JHA ESD Report dated 26.11.18.
Internal living green walls should be considered to help filter air and reduce energy consumption.	This will be considered as per the recommendations in the JHA ESD Report and will be addressed in detail design stage.
Dynamic modelling should be considered to optimise IAQ.	This will be considered as per the recommendations in the JHA ESD Report dated 26.11.18.
Rainwater harvesting should be considered BOH services, Common amenities and drip irrigation.	This will be included at detailed design stage.



ESD Measure (From JHA Report with EIS)	Response
Efficient water fittings should be used throughout the development.	This will be included at detailed design stage.
All pipes and fittings should be insulated to prevent heat loss.	This will be included at detailed design stage.
Water meters should be installed to monitor consumption.	This will be included at detailed design stage.
Photovoltaic panels should be considered for this development.	An area on the hotel roof has been nominated for potential PV panels, though the progression is to be determined in detailed design stage.

**Table 7** – ESD Measures

In addition to the above, and in response to concerns raised by Parramatta City Council and the letter by DPIE, an updated ESD Report has been completed by JHA, as at Appendix F.

That ESD report lists the following ESD initiatives included in the revised design with the RtS:

- Sufficient exposure to daylight;
- Appropriate construction and glazing selection;
- Energy-efficient air-conditioning systems with control strategy and thermal comfort tuning;
- External horizontal & vertical shading devices;
- Efficient lighting systems;
- High WELS rated water fixtures;
- Sustainable materials;
- Rainwater capture and reuse;
- Green Walls & Green Roofs.

The ESD report and the applicant also commits to the following ESD targets:

- National Construction Code (NCC) 2019 Section J – Energy Efficiency;
- Green Star Design & As-built equivalency v1.3 – 5 Star Rating; and
- NABERS Energy for Hotels – 5 Star Rating.

These commitments can be ensured by a DA condition.

### 6.1.7 Social Impacts

No use is being dislocated by the proposal.

The Council has asked that a social impact assessment should address 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).

In terms of these above matters, the following response is given:

- Management of liquor is governed by the Liquor Act 2007. The proposal is for a hotel with ancillary spaces. The areas serving alcohol will be under the management and care of the hotel operator, within whose interest it is to ensure the primary function of quiet and orderly management for guests aligns with wider social objectives of responsible alcohol service and responsible management. Hotels are not typically associated with "problem" consumption venues because of this alignment of objectives. Despite this, the Plan of Management lodged with the EIS (Appendix V) provides a House Policy and detailed provisions related to responsible service of alcohol. It is expected that management of the premises in accordance with the Plan of Management would be a condition of consent.
- No gaming is proposed as part of the DA. Indeed, the nature of the use provides a strategic benefit of reducing reliance on gaming income to the Parramatta Leagues Club.
- There are social benefits in the provision of services within a controlled environment adjoining the Stadium, both in terms of activation and surveillance of the public domain, which is significantly improved compared to the existing situation, and in relation to ensuring responsible service and consumption of alcohol.
- The gymnasium is ancillary to the hotel, although will also be available to Parramatta Leagues Club members and the public. A pool is no longer proposed and since the original DA, a new public pool has been provided by Council. A fee structure has not been established, although of course will be dependent on market demand. Again, there are aligned mutual objectives of having the facility used by people, so the pricing structure will facilitate its use.



- Amenity and safety protection measures are outlined in the Plan of Management and CPTED assessment with the EIS (Appendix F). It is expected that management of the premises in accordance with the Plan of Management would be a condition of consent.
- The upper-level bar is ancillary to the hotel and is a further service to augment the use and enjoyment of the hotel. The potential for adverse noise impacts has been specifically addressed and modelled in the expert Acoustic assessment lodged with the DA (EIS Appendix Q, by JHA, pg. 18) and the report concludes: *The predicted noise levels demonstrate that the operations of the rooftop bar are expected to meet the noise criteria* (pg.25).
- In terms of safety, a CPTED assessment was made and lodged with the DA, supporting the proposal (EIS Appendix F). The safety in and around the site will be improved compared to an unsupervised open carpark, by facilitating surveillance from glazing around the new ground floor, engagement with the public domain by the supervised hotel porte-cochere, and by aligning and focussing pedestrian desire lines in the public domain through well-designed and lit thoroughfares. This will make the pedestrian environment better regulated and safer, particularly during busier event days at the adjoining stadium.
- The Council has suggested CCTV be included as a condition of consent. This is committed to in the Plan of Management and is intended (pg. 10, commitment 31), so no concern with this recommendation by Council is raised.
- Short-term construction issues would be appropriately managed and mitigated by standard conditions of consent, as for all development, to appropriately manage and balance impacts with orderly construction. Again, the site is under lease and overall management by the Parramatta Leagues Club, and it is in the Parramatta Leagues Club's interests to ensure that activities do not unduly affect the operation of the immediately adjoining Club (its main asset and the only immediately-adjointing land use), so this is beneficial in terms of aligning objectives and likely impacts, in relation to impacts on other land uses more distant from the site. The location of the development on the site also means no storage or adverse impacts on the access point from Eels Place will result, given the distance and space for on-site storage.
- The main construction-related impacts are anticipated to be related to truck movements, noise, dust and possible discovery of relics (although unlikely). Overall construction traffic is reasonably reduced by limiting the footprint and depth of the excavation, which also minimises other excavation-related amenity impacts. The site is not founded on rock, which will reduce potential noise impacts compared to other sites. Also, the use of pre-cast building elements will also help to reduce the construction period. Notwithstanding this, there will be traffic impacts from construction, for the duration of construction. Further assessment of this issue is contained in the revised traffic and parking assessment by TPPP (RtS, Appendix E).
- The proposal will meet all access requirements and this will be fully assessed and addressed at Construction Certificate stage. The building is accessible at ground level and an accessible lift is provided to all levels. The DA was supported by a BCA and

Access Compliance report (EIS, Appendix P), which also addressed DDA legislation and the BCA, concluding “compliance is readily achievable” (pg. 12).

- Heritage impacts have been addressed previously, and in the attached visual analysis by Hassell and SoHVI by Purcell (RtS, Appendix A and B). Similarly, visual impacts have been addressed in the previous section of this RtS. This has included additional and updated visual impact modelling from the Stadium, as raised by Council.
- The activation of the site and the engagement of the activated ground floor level with the surrounding public domain, including the adjoining “Little Coogee Walk” is significantly improved compared to the current situation and is a design-driver for the layout. The building will not overshadow the park, and is surrounded by large buildings, replacing a bitumen carpark. The building has very limited visibility from the Park from key vantage points, as contained in the Technical Guide associated with the heritage listing of OGHD, and as addressed in the updated SOHVI by Purcell. This impact has been reduced by the reduction of two storeys since the lodgement of the DA and with this RtS. The proposal will enhance use and activation of Parramatta Park, not diminish its enjoyment.
- Community engagement has been facilitated by the DA. Due to separation distances, there are no significantly-affected immediate neighbours, while wider community views are varied, mostly relating to heritage issues. Consultation during construction could be facilitated by a condition of consent.
- The proposal includes recreational and active uses which complement the park setting and the leisure and sporting role of the precinct. A pool is no longer proposed, although the gymnasium will support wider recreational planning and infrastructure, on a well-located site. As stated in Council's Community Infrastructure Strategy 2020 (CIS): “*Indoor recreation facilities and programs help build stronger, healthier, happier and safer communities*” (pg. 348).

In summary, rational and efficient use of resources will result from the proposal. The proposal will assist in supporting a Club, as well as entertainment and recreational uses which are very important to the social fabric of society. The proposal also allows the expenditure of considerable money towards an asset that is useable by the public, at no cost to the government or taxpayers, which is a positive outcome for society.

External impacts from use of the premises are guided by a Plan of Management and numerous mitigation measures, while increased surveillance will assist in reducing the likelihood of crime in the public domain.

The highest potential negative social outcome is considered to be related to alcohol consumption during operation, both in terms of health impacts, and impacts from people on the amenity of the area. Heritage impacts have been addressed previously. Other amenity impacts from the proposed building are not considered to be significantly adverse. However, the operation of the premises will be regulated by conditions of consent, the Plan of Management and the provisions of the Liquor Act 2007, which allow and ensure ongoing oversight, regulation and review.

Overall, when considering all potential impacts and benefits, social impacts from the proposal are expected to be positive.

## **6.2 Updated Mitigation Measures**

A consolidated list of mitigation measures is included at Appendix H. This has been updated from that included in the EIS, and relates to the current revised proposal submitted with the RtS. It takes the same overall structure as within the EIS, relating to mitigation measures utilised in the design/planning phase ("done"), and those mitigation measures able to be addressed by conditions of development consent arising from consideration of the design or from recommended measures within various reports or through matters ("to be implemented").

## **7 Summary and Conclusion**

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1. The proposal will bring a significant improvement to the area, activating a current bitumen carpark, reducing car dependency and significantly improving the pedestrian and public domain amenity to the wider park precinct.
2. The building and design were supported by a robust design review process by a Design Excellence Panel, including representation from the independent Office of Government Architect and Council's highly-respected City Architect.
3. The design is of a high quality.
4. The proposal is permissible and does not breach any planning controls.
5. The heritage vistas in both Council's DCP and the Conservation Agreement with the Federal Government have been fully complied with. The building is 600-800m away from Old Government House and key vistas, and the new building will essentially be within the tree-line of the nominated vistas (95-100% below the tree-line, which is conservative when the montages are viewed), whereas only 80% is required to be below the tree-line in both Council's DCP and the Conservation Agreement.
6. There has been a detailed heritage assessment by a reputable firm, in line with technical guidelines. The technical assessment has not been disputed.
7. Any assertion that a building on the subject site should not be seen from anywhere in the adjoining park or Parramatta North Historic sites is contrary to the detailed controls that apply, is unrealistic and would compromise planning objectives for the "second CBD" of Sydney, as well as wider planning controls.
8. Despite the benefits, the proposal has been reduced in height by a further 2 storeys, given feedback and concerns raised.
9. Other changes to access have been made to address issues raised by TfNSW, RMS and Venues NSW. This also includes consideration of events at Parramatta Stadium, guided by expert traffic and parking advice.
10. There is no draft Planning Proposal which compromises the proposal. To the contrary, the draft Parramatta CBD Planning Proposal does not alter planning controls applying to the site although does include significant height and FSR bonuses along Marsden

Road, two blocks to the east (e.g., up to 80m or 5-10 storeys higher than proposed at this site). This is likely to lead to future taller buildings in the visual backdrop of the proposed hotel as viewed from the south and west, and also undermines any approach or position that asserts Parramatta CBD buildings should not be visible from anywhere in Parramatta Park. Despite this, the proposal does not rely on potential future buildings for its justification.

11. For all the reasons in the original EIS and this RtS, the proposal is in the public interest and is worthy of support.
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