

17 December 2018

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## Environmental Impact Statement – 1 Eels Place, Parramatta:

New Hotel, with associated fitness  
and wellness uses (SSD 8800)

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**Date:** 6 December 2018

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**Client:** Parramatta Leagues Club  
15-17 O'Connell Street,  
Parramatta  
NSW 2150

**Site:** Parramatta Leagues Club Carpark  
Known as 1 Eels Place  
Parramatta  
NSW 2150


**Proposal/Development:** Hotel and ancillary recreational and leisure uses

**Estimated Cost:** \$125.7 million (ex GST)

**Declaration:** I declare that I have, with the assistance of other experts and the client, prepared this Environmental Impact Statement. To the best of my knowledge:

- (a) It is in accordance with the requirements of the Environmental Planning and Assessment (EPA) Act 1979 and Schedule 2 of the EPA Regulation 2000;
- (b) This Statement contains all known available information that is relevant to the environmental assessment of the proposed development;
- (c) at the information contained in this Statement is neither knowingly false nor misleading.

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**Signed:**   
Jason Perica

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S	Pedestrian Wind Environmental Study
T	Solar Light Reflectivity Study
U	Operational Waste Management Plan
V	Plan of Management
W	Market Overview Report
X	Cost Report

## 1. Executive Summary

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Parramatta Leagues Club has been working towards this proposed hotel for many years, guided by a desire to provide a use which contributes positively to the area, meets the Club's corporate responsibilities and provides a suitable and sustainable asset for a long time.

The site of the proposed hotel is a bitumen carpark for 94 cars, with a central large Lemon Scented Gum tree, which is its redeeming feature. It is owned by Parramatta Park Trust, under an exclusive long term Lease with Parramatta Leagues Club. With the approval and construction of an adjoining carpark for 773 car spaces, designed by Hassell and of a high quality, the adjoining regional park and surrounding heritage precinct, adjoining regional Western Sydney Stadium to host 30,000-40,000 people under construction, and the area to the north likely to undergo urban transformation given recent changed planning controls, the development of the site represents a significant opportunity for the area, in terms of its potential to host a complementary use, high quality building and an enhanced public domain for use and enjoyment.

In terms of the use, the Club has been considering options and negotiating with Parramatta Council for some time, seeking to complement the sporting, recreational, leisure and entertainment uses that signify the precinct in which the Club, Stadium and Parramatta Park are located. A hotel specifically targeted to a market segment for teams and groups, as well as corporate visitors, with an associated pool, well-equipped gymnasium, function room and leisure uses, is ideal. Such a use supports the adjoining significant public assets of Parramatta Park and the pending Western Sydney Stadium, which at times can be under-utilised. It also supports the nearby Parramatta CBD, also undergoing transformation.

In terms of securing a high quality building to exhibit design excellence, Hassell have been appointed, who have worked in the precinct for over 5 years and have been responsible for prior master planning work for Parramatta Park Trust, assisted by well-regarded architectural and landscape architectural experience. In terms of the public domain, a well-considered building has the opportunity to activate the surrounding public domain, improve surveillance, provide direction to pedestrian desire lines and stitch the surrounding uses and attractions together.

In November 2017, Secretary Environmental Assessment Requirements (SEARs) were issued by the NSW Department of Planning and Environment for the proposal (SSDD 8800), which is State Significant Development due to being a hotel over \$100 million in Capital Investment Value (CIV). Since that time, the Parramatta Leagues Club and its' consultant team have worked through a Design Excellence Strategy and subsequent process, which included establishment of a Design Review Panel, chaired by the NSW Office of Government Architect, including the Parramatta Council City Architect and an independent well-regarded architect and urban designer. This included 3 panel meetings/workshops, which were positive and were embraced by the proponent team, with the process assisting in improving the design development of the proposal. The activation and ground floor/public domain was refined and the building better modulated and conceived as a result of this process. This included greater articulation and a slight reduction in the height compared to the SEARs request, with a stepping of the roof form.

Consultation with key agencies also occurred after issuing of the SEARs, and this also lead to a number of changes since the draft proposal submitted with the SEARs request. The most

significant two changes were removal of the former Gatehouse from the site area/scope and removal of a proposed vehicular egress to O'Connell Street. The former Gatehouse (and current cottage) was previously proposed to be demolished to create a public park entry space and interpretation of the former Gatehouse. However, this was not supported by the owner of the land (Parramatta Park Trust, PPT) due to concerns regarding the heritage significance of the building, which is on the PPT's Section 170 Register. The previous vehicular egress to O'Connell Street was not supported by NSW Roads and Maritime Services (RMS), as O'Connell Street is a classified road and more access points are generally avoided where other options may exist. The exit was also of some concern to PPT in terms of the impact on the pedestrian environment and former Gatehouse.

The removal of the egress to O'Connell Street required the review of the proposed southern access, which fortunately is an access road approved as part of the adjoining Western Sydney Stadium development approval. The access road is within the adjoining land owned by Venues NSW (VNSW). This access location was supported by the Design Review Panel, as alternatives would adversely affect the public domain and important pedestrian environment, in a busy area.

However, the approved width of that access road (6m) only allows standard cars to pass each other, with any truck or bus movement relying on an on-site managed solution (by VNSW). The proposed access for the hotel involves a widening of this approved access road, which would ultimately also benefit the future approved "Stage 1" building of 20,000sqm to the south of the access road on VNSW site, as other access to O'Connell Street or the south would not be possible or desirable. This issue has been the subject of considerable discussion between the proponent for the hotel, VNSW and PPT. While there is confidence an agreement will be reached between the parties, with some high level in-principle support, actual written owner's consent for this aspect of the proposal has not been obtained for the proposed access from VNSW for the DA lodgement. This approach is on the understanding that such approval (and access rights) will need to be agreed prior to the determination of the Development Application.

In terms of other consultation, Parramatta City Council has been generally supportive to date during meetings and discussions, although will review the DA when publicly exhibited. The other very important matter is the visual impacts on the heritage significance of the adjoining Old Government House Domain, including First Government House and Parramatta Park. This precinct has local, State, Federal and International heritage significance. In this regard, consultation has occurred with the Federal Department of Environment and Energy (DoEE), who reviewed the preliminary heritage and visual Impact assessment and agreed the proposal would not trigger the need for approval under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act). Critically, the proposed building height does not breach a control requiring 80% of the building height to be below the tree canopy from key vistas. Indeed the building is generally at or below that tree height from such locations. Consultation has also occurred with NSW Office of Environment and Heritage (OEH), and formal feedback has been considered and addressed in the final Heritage and Visual Impact Assessment.

There are a number of potential environmental impacts from the proposal. Broadly, they can be categorised into those relating to:

- (a) Excavation and below-ground issues;

- (b) The proposed building; and
- (c) Access and the public domain.

All of these potential environmental impacts and considerations, as well as mitigation measures, have been considered in this Statement and associated expert reports and attachments.

In terms of excavation and in-ground issues, the main issues relate to archaeological impacts, contamination, and ground water. In terms of archaeological impacts, the site benefits from a very detailed investigation (including ground testing at 22 locations) undertaken for the adjoining carpark, which included test holes on the subject site. Due to this data and associated research, the expert archaeologist has been able to conclude the proposal would not cause adverse impacts on aboriginal cultural values, and will be acceptable subject to a number of recommendations regarding further verification and monitoring during excavation. In terms of contamination, this has been analysed and a Detailed Site Investigation and Remediation Action Plan prepared to address contaminants, which primarily relate to areas of asbestos (common in the wider precinct), relative levels of acidity soils and some trace metals. There is no expected impacts on groundwater, as this has been measured and monitored (Including during a rain period) as being below the proposed basement. The flooding and stormwater considerations are appropriately addressed by the proposed design, while services for the development are able to be provided.

The potential impacts related to the proposed building broadly relate to heritage, streetscape, amenity and ecological impacts. As mentioned previously, the heritage impacts have mainly been guided by considerations related to the adjoining OGHD, although also the Parramatta North historic precinct to the north of the site. A key guiding technical document supporting the OGHD listing (Planisphere, 2012) has been considered and the visual impacts are acceptable, with very limited visibility from key vistas within the surrounding Park and old Government House precinct. The Female Factory and area to the north has also been assessed. There are items and a Conservation Area in the vicinity of the site to the east across O'Connell Street, although well removed from the proposed building by around 40m. The adjoining Gatehouse is being retained.

The street and townscape considerations have been given close attention by the Design Review Panel during the design development phase. The building reinforces a wider city grid and appropriately defines public space, with a height that mediates between the adjoining Stadium and Parramatta Leagues Club and higher development permitted to the north. The many potential amenity impacts are generally assisted by the nature of the site and surrounds in this instance. Usual potential impacts of overshadowing, privacy and views are reduced due to the separation to surrounding sensitive uses and the distance to other residential and sensitive buildings. The proposal will not cause adverse overshadowing to the future Western Sydney Stadium playing field of any consequence. The retention of a large Lemon Scented Gum, recognised as the most significant tree on the site is sound, while the removal of 7 other trees is justified, not providing any hollows or significant habitat, which is not surprising for trees in a bitumen carpark, lacking any understorey. Replacement native planting is proposed for these trees at a ratio of approximately 1.5:1.

There is a colony of Grey Headed Flying Foxes (GHFF) is located approximately 110m to the west of the site in Parramatta Park. The impacts from the proposal on this colony are indirect only and



have been guided by expert ecology opinion and recommendations to ensure no significant or adverse impact. A significant impact under the EPBC Act is not anticipated and this can be formalised with further consultation with DoEE during the assessment process. Other amenity impacts associated with the proposed building are suitably addressed by the design and mitigation measures, as outlined in this Statement and attached reports.

In terms of access, the proposal is again assisted by the circumstances of the site and this case. A large carpark exists to the west (recently built by the proponent using the same architectural firm), and in partial anticipation of development of this site. This carpark provides an asset for the proposed use, whose peak demand does not coincide with peak demand for the adjoining Club use, resulting in sustainable use of the facility, and reducing parking impacts on surrounding land. No additional parking is provided or needed with the hotel due to the existing carpark. This in turn reduces overall traffic impacts, by limiting further parking supply. The vehicular access proposed from the south on the Stadium site also makes use of an existing asset and an approved access road (partially existing), thereby limiting any new road opening, albeit with some localised widening for rational long term access. The utilisation of existing and approved vehicular roads also maximises the potential to improve the public domain and pedestrian environment, which is occurring with the proposal. Logical connections to the surrounds and significantly improved activation and engagement with the pedestrian public domain is provided. An expert traffic assessment finds the traffic impacts will be acceptable, including considering background and cumulative growth in traffic.

The proposal will result in positive economic impacts from a use which supports adjoining State assets, generates an income to the State Government through commercial leasing and provides both permanent and construction jobs into the future. The hotel guests will also help support the Parramatta CBD and the proposed hotel design “in the park” is a unique attractor to the area. This will help with both tourism and local expenditure. Social impacts are also expected to be positive, with a number of public benefits and limited negative impacts on any private land.

The proposal is suited to the site and surrounds, the design and mitigation measures appropriately consider and address potential impacts, and the benefits of the proposal are considered to outweigh the impacts. This Statement concludes the proposal should be approved.

## 2. Introduction and Background

### 2.1 Secretary's Environmental Assessment Requirements (SEARs)

SEARs for the project were issued by the NSW Department of Planning and Environment on 6 November 2017.

The following table provides an outline of the SEARs issued and where in this EIS or Attachments the SEARs are met.

Ref	Requirement	Where Addressed
Gen	<p>The Environmental Impact Statement (EIS) must address the Environmental Planning and Assessment Act 1979 and meet the minimum form and content requirements in clauses 6 and 7 of Schedule 2 of the Environmental Planning and Assessment Regulation 2000. Notwithstanding the key issues specified below, the EIS must include an environmental risk assessment to identify the potential environmental impacts associated with the development. Where relevant, the assessment of the key issues as listed below, and any other significant issues identified in the risk assessment, must include:</p> <ul style="list-style-type: none"> <li>• adequate baseline data</li> <li>• justification of impacts</li> <li>• consideration of potential cumulative impacts due to other development in the vicinity</li> <li>• measures to avoid, minimise and if necessary, offset the predicted impacts, including detailed contingency plans for managing any significant risks to the environment</li> </ul>	EIS – Throughout + Attachments
Gen	<p>The EIS must also be accompanied by a report from a qualified quantity surveyor providing:</p> <ul style="list-style-type: none"> <li>• a detailed calculation of the capital investment value (CIV) of the development (as defined in clause 3 of the Environmental Planning and Assessment Regulation 2000), including details of all assumptions and components from which the CIV calculation is derived</li> <li>• an estimate of the jobs that will be created by the development during construction and operation</li> <li>• verification that the CIV was accurate on the date that it was prepared.</li> </ul>	Attachment X
1	<p>1. Environmental Planning Instruments, Policies and Guidelines</p> <ul style="list-style-type: none"> <li>• The relevant statutory provisions contained within the applicable EPIs, including: <ul style="list-style-type: none"> <li>o State Environmental Planning Policy (State &amp; Regional Development) 2011</li> <li>o State Environmental Planning Policy (Infrastructure) 2007</li> <li>o State Environmental Planning Policy No 19 - Bushland in Urban Areas</li> <li>o State Environmental Planning Policy No. 55 - Remediation of Land (SEPP 55)</li> <li>o State Environmental Planning Policy No 64-Advertising and Signage</li> </ul> </li> </ul>	EIS, Part 5 (all)

Ref	Requirement	Where Addressed
	<ul style="list-style-type: none"> <li>o State Environmental Planning Policy (Vegetation in Non-Rural Areas) 2017</li> <li>o Sydney Regional Environmental Plan (Sydney Harbour Catchment) 2005</li> <li>o Parramatta Local Environmental Plan 2011</li> <li>o Parramatta Development Plan 2011</li> <li>• The relevant provisions, goals and objectives in the following: <ul style="list-style-type: none"> <li>o NSW State Priorities</li> <li>o A Plan for Growing Sydney</li> <li>o Towards our Greater Sydney 2056</li> <li>o Draft West Central District Plan</li> <li>o Guide to Traffic Generating Developments (RMS)</li> <li>o Sydney's Bus Future 2013</li> <li>o Sydney's Walking Future 2013</li> <li>o Sydney's Cycling Future 2013</li> <li>o NSW Planning Guidelines for Walking and Cycling</li> <li>o NSW Long Term Transport Master Plan</li> <li>o Better Placed - An integrated design policy for the built environment of New South Wales.</li> </ul> </li> </ul>	
2	<p>2. Design excellence</p> <ul style="list-style-type: none"> <li>• A design excellence strategy, prepared in consultation with the Government Architect NSW, demonstrating how the proposal will achieve design excellence consistently at each stage of the planning process. This strategy shall identify: <ul style="list-style-type: none"> <li>o the process to ensure that design excellence is achieved</li> <li>o how comments from the Government Architect NSW and Design Review Panel will be addressed.</li> </ul> </li> </ul>	EIS Part 6.1, 6.3 + Attachments D and E
3	<p>3. Built Form and Urban Design</p> <ul style="list-style-type: none"> <li>• An outline of the design process leading to the proposal with justification of the suitability of the site for the proposal.</li> <li>• An urban design analysis with consideration of the proposed building form, height, setbacks, bulk and scale in the context of the immediate locality, the wider area, street activation and the desired future character of the area, including views, vistas, open space, the public domain and connectivity.</li> <li>• The impacts of any proposed building identification signage, including traffic safety and public transport operations.</li> <li>• A table identifying the proposed development's different land uses including a floor-by-floor breakdown of GFA, total GFA and site coverage.</li> </ul>	<p>EIS Part 6.1 + Attachments D and E</p> <p>Attachment A</p>
4	<p>4. Amenity</p> <ul style="list-style-type: none"> <li>• The proposal shall consider and justify any impacts on view loss, sunlight/overshadowing, wind impacts, reflectivity, visual and acoustic privacy, and safety and security to achieve a high level of environmental amenity.</li> </ul>	EIS Part 6.15, 6.2, 6.14, 6.16, 6.12, 6.3 + Attachments A, F, Q, and S

Ref	Requirement	Where Addressed
5	<p>5. Visual Impacts</p> <ul style="list-style-type: none"> <li>A visual impact assessment is required to identify the visual changes and view impacts of the project to/from key vantage points and surrounding land. Photomontages or perspectives should be provided showing the project.</li> <li>The visual impact assessment must consider the impact of the project on key views to and from places of heritage significance including important views as identified within the Conservation Agreement for the protection and conservation of World and National Heritage values of the Australian Convict Sites, Old Government House and Domain, Parramatta.</li> </ul>	<p>EIS Part 6.1 + Attachments A, D and G</p> <p>Attachment G</p>
6	<p>6. Transport, Traffic, Parking and Access</p> <ul style="list-style-type: none"> <li>A transport and accessibility impact assessment prepared in accordance with the relevant guidelines identifying: <ul style="list-style-type: none"> <li>Operation. <ul style="list-style-type: none"> <li>current daily and peak hour traffic generation (light and heavy vehicle), public transport, walking and cycling movements and existing traffic and transport facilities located within the vicinity of the proposed development.</li> <li>proposed daily and peak hour traffic generation (light and heavy vehicle), public transport, walking and cycling trip generation during operation.</li> <li>access to, from and within the site from the road network including intersection location, design and sight distance (i.e. turning lanes, swept paths, sight distance requirements).</li> <li>proposed access arrangements including service vehicles, emergency vehicles and loading areas for the development</li> <li>the impact of the proposed development on vehicular and pedestrian access into Parramatta Park and the riverside.</li> <li>the cumulative traffic impacts of existing, approved and planned developments in the area including the impact of traffic generated on nearby intersections and any road infrastructure works required.</li> <li>the existing and future performance of key intersections providing access to the site, and any required upgrades (road intersections) as a result of the development.</li> <li>an assessment of predicted impacts on road safety.</li> <li>the adequacy of existing and future public transport, pedestrian and bicycle provisions to meet the demand of the proposed development.</li> <li>the existing, proposed and any temporary pedestrian and bicycle routes as well as measures to maintain road and personal safety in accordance with CPTED principles.</li> <li>provisions for end-of-trip facilities, public transport facilities and on-site bicycle parking demonstrating compliance with relevant RMS guidelines and Australian Standards.</li> <li>measures to encourage sustainable travel and non-car mode share during operation.</li> </ul> </li> <li>Construction <ul style="list-style-type: none"> <li>an assessment of traffic and transport impacts during construction and how these impacts will be mitigated for any</li> </ul> </li> </ul> </li> </ul>	<p>EIS Part 6.10 + Attachment K</p> <p>Attachment K</p>

Ref	Requirement	Where Addressed
	<p>associated traffic, pedestrians, cyclists, including the preparation of a draft Construction Pedestrian Traffic Management Plan. This Plan shall include vehicle routes, truck numbers, hours of operation, access arrangements and traffic control measures for all works.</p> <ul style="list-style-type: none"> <li>o details of construction vehicle routes, peak hour and daily truck movements, hours of operation, access arrangements at all stages of construction and traffic control measures for all works.</li> <li>o an assessment of construction impacts on road safety at key intersections and locations for potential pedestrian, vehicle and bicycle conflicts.</li> <li>o details of any temporary cycling and pedestrian access during construction.</li> <li>o detail of access arrangements for workers, emergency services and the provision for safe and efficient access for loading and deliveries.</li> <li>o measures to encourage sustainable travel and non-car mode share during construction.</li> </ul>	
7	<p>A Statement of Heritage Impact (SOHI) is to be prepared by a suitably qualified heritage consultant in accordance with the guidelines in the NSW Heritage Manual. The SOHI is to document and address the impacts of the proposal on any heritage significance of the site and adjacent areas and is to address the following:</p> <ul style="list-style-type: none"> <li>o the impacts of the proposal on State and Local heritage items, places or relics significant to Aboriginal or European culture or history, in accordance with the Conservation Agreement for the protection and conservation of World and National Heritage values of the Australian Convict Sites, Old Government House and Domain, Parramatta</li> <li>o the Aboriginal cultural heritage values that exist across the whole area that will be affected by the development. The identification of cultural heritage values should be guided by the Guide to investigating, assessing and reporting on Aboriginal Cultural Heritage in NSW (DECCW, 2011) and consultation with OEH regional officers</li> <li>o potential visual impacts of the proposal on the heritage significance of heritage items in the vicinity of the site including Parramatta Park and Old Government House (SHR 00596), Roseneath Cottage (SHR 00042), the Norma Parker Correctional Centre (SHR 00811), Cumberland District Hospital Group (SHR 00820) and the Ross Street Gatehouse</li> <li>o the attempts to avoid and/or mitigate the impact on the heritage significance or cultural heritage values of the site and the surrounding heritage items</li> <li>o the cumulative impacts of development in the highly sensitive area identified in the Conservation Agreement including any overshadowing on National, State or local heritage items. The SOHI should be supported with detailed drawings and photomontages to illustrate the impact assessment. The SOHI must also address the proposal against the policies (or guidelines) of the: <ul style="list-style-type: none"> <li>- Parramatta North Historic Sites Consolidated Conservation Management Plan (prepared by TKD Architects, dated March 2017)</li> </ul> </li> </ul>	<p>EIS Part 6.9 + Attachment G &amp; H</p> <p>Attachment G</p> <p>Attachment H</p> <p>Attachment G</p>

Ref	Requirement	Where Addressed
	<p>- Development in Parramatta City and the Impact on Old Government House and Domain's World and National Heritage Listed Values - Technical Report (prepared by Planisphere, dated 2012).</p> <p>o the Parramatta Female Factory Precinct is currently being assessed for National Heritage Listing. In the event that the Precinct is included on the National Heritage List, the SOHI should also assess the potential visual impacts on the National Heritage values.</p> <ul style="list-style-type: none"> <li>• A historic archaeological assessment is to be prepared by a suitable historical archaeologist to satisfy the Excavation Director Criteria of the Heritage Council of NSW. The archaeological assessment is to be in accordance with the Heritage Division, Office of Environment and Heritage Guidelines including but not limited to 'Assessing Significance for Historical Archaeological Sites and Relics' 2009. The assessment is to demonstrate the following; <ul style="list-style-type: none"> <li>o the Aboriginal cultural heritage and historical archaeological relics likely to be present within the site and their significance</li> <li>o the likely impacts of the proposal on these relics</li> <li>o opportunities for avoidance through careful consideration of redesign where state significant archaeological resources are identified</li> <li>o appropriate mitigation strategies where harm is likely to occur</li> <li>o in the event that harm cannot be avoided in whole or in part, an appropriate Research Design and Excavation Methodology should also be prepared to guide any proposed excavations</li> <li>o consideration of recent archaeological assessments and results from archaeological testing undertaken for the study area and in the adjoining Norma Parker Correctional Centre (SHR 811) and the Cumberland District Hospital Group (SHR820)</li> <li>o consideration and address the results of the recent historical archaeological test excavation undertaken in the Parramatta North Urban Transformation site included evidence of the former state significant mill races which may extend into the subject site.</li> </ul> </li> <li>• Where Aboriginal cultural heritage values are identified, consultation with Aboriginal people must be undertaken and documented in accordance with the Aboriginal cultural heritage consultation requirements for proponents 2010 (DECCW). The significance of cultural heritage values for Aboriginal people who have a cultural association with the land must be documented.</li> <li>• Any objects recorded as part of the assessment must be documented and notified to OEH.</li> <li>• An interpretation strategy that includes the provision for interpretation of any archaeological resources uncovered during the works.</li> </ul>	Attachment H (all below)
8	<p>8. Public Domain and Public Access</p> <ul style="list-style-type: none"> <li>• Outline the scope of public domain improvements, street activation, key pedestrian linkages with and between other public domain spaces, existing and proposed buildings and surrounding areas.</li> </ul>	EIS Part 4 and 6.3 + Attachments A, B, D and F
9	<p>9. Drainage and Flooding</p> <ul style="list-style-type: none"> <li>• The drainage/flooding issues associated with the site, including:</li> </ul>	EIS Part 6.20 + Attachment R



Ref	Requirement	Where Addressed
	<ul style="list-style-type: none"> <li>o stormwater and drainage infrastructure</li> <li>o assessment of any flood risk in accordance with the guideline contained in the NSW Floodplain Development Manual 2005, including potential effects of climate change, sea level rise and an increase in rainfall intensity.</li> </ul>	
10	<p>10. Soil and Water</p> <ul style="list-style-type: none"> <li>• An integrated water management system including consideration of stormwater and wastewater.</li> <li>• Detail erosion, sediment and storm water management and controls during construction and management and mitigation measures for the prevention of potential water quality impacts during construction.</li> <li>• The potential impact of the development on groundwater levels, flow paths and quality.</li> <li>• The potential impacts in terms of the NSW Aquifer Policy (DPI, 2012).</li> <li>• Any water licensing requirements or other approvals required under the Water Act 1912 or Water Management Act 2000.</li> <li>• The geotechnical issues (including Acid Sulphate Soils) associated with the construction of the development.</li> <li>• Details of water supply including consideration of alternative water supply arrangements, water sensitive urban design and water conservation measures.</li> </ul>	EIS Part 3.5, 5.4, 6.20, 6.6 and 6.7 + Attachments R, N, M and L
11	<p>11. Ecologically Sustainable Development (ESD)</p> <ul style="list-style-type: none"> <li>• Detail of how best practice ESD principles (as defined in clause 7(4) of Schedule 2 of the Environmental Planning and Assessment Regulation 2000) will be incorporated in the design, construction and ongoing operation phases of the development,</li> <li>• Describe the measures to be implemented to minimise consumption of resources, energy and water, including details of alternative energy and water supplies, rainwater harvesting, proposed end uses of potable and non-potable water, demonstration of water sensitive urban design and any water conservation measures.</li> </ul>	EIS throughout, Part 5.2, 6.20 + Attachment N, R, O and V
12	<p>12. Biodiversity</p> <ul style="list-style-type: none"> <li>• A Biodiversity Development Assessment Report (BDAR) is to be prepared in accordance with the Biodiversity Assessment Method to assess the impacts of the proposed development on biodiversity. The BDAR must be prepared by a person accredited in accordance with the Accreditation Scheme for the Application of the Biodiversity Assessment Method Order 2017 under Section 6.10 of the Biodiversity Conservation Act 2016. The BDAR is to address Section 6.12 of the Biodiversity Conservation Act 2016, Section 6.8 of the Biodiversity Conservation Regulation 2017, the Biodiversity Assessment Method and the following: <ul style="list-style-type: none"> <li>o details of the measures proposed to address the offset obligation</li> <li>o the total number and classes of biodiversity credits required to be retired for the development project</li> <li>o the number and classes of like-for-like biodiversity credits proposed to be retired</li> </ul> </li> </ul>	EIS Part 6.5 + Attachment J

Ref	Requirement	Where Addressed
	<ul style="list-style-type: none"> <li>o the number and classes of biodiversity credits proposed to be retired in accordance with the variation rules</li> <li>o any proposal to fund a biodiversity conservation action</li> <li>o any proposal to make a payment to the Biodiversity Conservation Fund.</li> <li>• If requesting the application of the variation rules under Section 6.4 of the Biodiversity Conservation Regulation 2017, the BDAR must contain details of what reasonable steps have been taken to attempt to obtain the required like-for-like biodiversity credits.</li> <li>• The BDAR is to also address the impacts of the proposed development on the existing Grey-headed Flying-fox colony adjacent the site. The report is to specifically consider the impact of construction noise, including any cumulative impacts of other developments in the area. The report is to provide detail on how the proposal will minimise and/or offset any identified impact</li> </ul>	
13	<p>13. Noise and Vibration</p> <ul style="list-style-type: none"> <li>• A Noise and Vibration Assessment is required and is to include consideration of the proposed construction and operational impact of the development in accordance with the relevant EPA guidelines.</li> <li>• This assessment must consider any potential noise impacts on nearby noise sensitive receivers and outline proposed noise mitigation and monitoring procedures.</li> </ul>	EIS Part 6.12 + Attachment Q
14	<p>14. Developer Contributions</p> <ul style="list-style-type: none"> <li>• The scope of developer contributions proposed.</li> </ul>	EIS Part 5.11
15	<p>15. Utilities</p> <ul style="list-style-type: none"> <li>• The existing capacity and any augmentation requirements of the development for the provision of utilities, including staging of infrastructure and additional licence/approval requirements in consultation with relevant agencies.</li> <li>• Any potential impacts on existing utility infrastructure and service provider assets, and demonstrate how these will be protected or impacts mitigated.</li> </ul>	EIS Part 3.5 and 6.22
16	<p>16. Building Code of Australia and the Disability Discrimination Act</p> <ul style="list-style-type: none"> <li>• A BCA and access report demonstrating compliance with the Building Code of Australia and the Disability Discrimination Act 1992.</li> </ul>	EIS Part 6.11 + Attachment P
17	<p>17. Contamination</p> <ul style="list-style-type: none"> <li>• Provide a detailed assessment of site contamination including information about groundwater and a detailed assessment of the footprint and surrounds of existing buildings and roads following demolition.</li> </ul>	EIS Part 6.6 + Attachment L
18	<p>18. Air Quality, Odour and Waste</p> <ul style="list-style-type: none"> <li>• The potential air quality, odour and waste impacts, in particular during the construction and operation of the development and appropriate mitigation measures.</li> </ul>	EIS Part 6.13, 6.21 + Attachment U and O
19	<p>19. Environmental, Construction and Site Management Plan</p> <ul style="list-style-type: none"> <li>• An Environmental and Construction Management Plan for the proposed works, and include:</li> </ul>	EIS Part 6.23 + Attachment A, O and V

Ref	Requirement	Where Addressed
	<ul style="list-style-type: none"> <li>o community consultation, notification and complaints handling</li> <li>o impacts of construction on adjoining development and proposed measures to mitigate construction impacts</li> <li>o noise and vibration impacts on and off site</li> <li>o water quality management for the site</li> <li>o construction waste classification, transportation and management methods in accordance with DECCW's Know Your Responsibilities: Managing Waste from Construction Sites Guideline.</li> </ul>	
Cons	<p>During the preparation of the EIS, the applicant must consult with the relevant local, State or Commonwealth Government authorities, service providers, community groups and affected landowners. In particular, consultation is required for the following agencies:</p> <ul style="list-style-type: none"> <li>• Commonwealth Department of Environment and Energy</li> <li>• The City of Parramatta Council</li> <li>• Government Architect's Office</li> <li>• Roads and Maritime Services</li> <li>• Transport for NSW</li> <li>• The Office of Environment and Heritage</li> <li>• Environment Protection Authority</li> <li>• Sydney Water</li> <li>• Parramatta Park Trust</li> </ul> <p>The EIS must describe the consultation process and the issues raised, and identify where the design of the development has been amended in response to these issues. Where amendments have not been made to address an issue, a short explanation should be provided.</p> <p>It is also strongly suggested that a site-specific design review process is undertaken prior to lodgement of the EIS. The applicant should contact the Government Architect's office to facilitate the design review process.</p>	EIS Part 2.6 + relevant Attachments

**Table 1 – SEARs Requirements and Reference**

The SEARs also required detailed information on Visual Impact Assessment, which is addressed both in the Heritage and Visual Impact Assessment (Attachment G) and the Design Report (Attachment D). Plan details are included in Attachments A-C.

## 2.2 Client and Consultant Team

The client is Parramatta Leagues Club Pty Ltd. The following consultant team has assisted in the proposal and components of the Environmental Impact Statement:

Area of Expertise	Consultant
Architecture, Urban Design, Landscape	HASSELL
Project Managers	APP
Quantity Surveyor	WT Partnership
Hotel Market advisers	NEM and Deloitte

Area of Expertise	Consultant
Town Planner	Perica & Associates Urban Planning
Heritage	Purcell
Archaeology and Aboriginal Assessment	Austral Archaeology
Transport, Traffic and Parking	TTPP
Ecological and Biodiversity	Cumberland Ecology
Arborist	New Leaf Arboriculture
Flooding, Stormwater, Structural Engineering	TTW
Services Engineering, Acoustic, Vibration and Utilities	JHA
Contamination, Geotechnical and Environmental Management	Douglas Partners
BCA and Access	BM+G
Wind and Reflectivity	Windtech
Waste Management	TTM
Surveyor	LTS Lockley

**Table 2** – Consultant Team

## 2.3 Proposal Overview

The proposal involves the demolition of existing improvements and erection of a 17 storey hotel building (plus a single level basement for services) accommodating 209 rooms and including the lower 4 levels which contain a café, pool, fitness/recreational uses and a function room ancillary to the hotel. Vehicular access is proposed from O'Connell Street to the 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, while further details regarding the proposal can be found in Part 4 of this Statement.

## 2.4 Objectives

The objectives of the proposal are to:

1. Provide a use which is suited to the site, and the recreational, leisure and entertainment precinct of which the site is part;
2. Provide a use which supports Parramatta City and the region;
3. Respect neighbouring amenity and complement surrounding uses;

4. Respect and appropriately respond to the governing planning controls;
5. Improve the public domain surrounding the precinct, provide better linkages between uses within the precinct and remove unsightly parking;
6. Demonstrate design excellence;
7. Achieve the principles of Ecologically Sustainable Development; and
8. Meet the Corporate goals and responsibilities of Parramatta Leagues Club and responsibly provide diversity of assets, while providing contributions to improve the precinct and wider community.

## 2.5 Background

Parramatta Leagues Club has been considering the future of its assets, in close consultation with Parramatta Park Trust and Parramatta Council, consistent with its corporate responsibilities, while seeking benefits for the site and wider area. The Club understands and supports the efforts of Parramatta Park Trust, the City of Parramatta Council and Venues NSW in improving the area for the wider community, and sees itself as also providing a contribution.

The adjoining building to the north is owned by the Parramatta Leagues Club, as well as some land to the north-west on O'Connell Street and Eels Place. The current (and previous) carpark site to the south of the Leagues Club building is owned by the State Government and managed by Parramatta Park Trust ("the Trust"), under a long term lease with Parramatta Leagues Club. The Trust also manages and owns the large adjoining regional Parramatta Park, an important social, recreational and cultural asset for Sydney. The confluence of park, sporting, leisure and entertainment uses in the Precinct creates both opportunities and challenges.

One of the challenges, and opportunities, was and is the open car park to the south of Parramatta Leagues Club (the subject site). As mentioned, this is owned by the Trust, yet under a long term exclusive lease to Parramatta Leagues Club. The attraction of the adjoining Club (and other uses in the area) previously led to parking pressures not met by the at-grade parking. This has been addressed by a 4-7 storey carpark providing for 773 car spaces (replacing 291 spaces, including the 94 spaces on the currently proposed hotel site). This was designed by leading architectural firm Hassell, and approved by the former Western Sydney Joint Regional Planning Panel, with support from Council staff. The carpark is a very good example of a well designed and considered carpark in a sensitive area.

The adjoining carpark was sensibly planned to the western end of the open carpark area, and stepped in form. This was to allow both mediating in form to the adjoining Parramatta Park to the west and south, and also to activate the interface with O'Connell Street and a main entrance to the park to the east (on the site of the proposed hotel). At the time of the previous carpark DA, a leisure centre was foreshadowed to be provided on the subject site, in recognition of the nature of the precinct, a pending closure of a public pool (now closed) and to complement surrounding uses. This was foreshadowed in the approved carpark DA, although not included formally in that DA. A number of expert reports (e.g. below ground testing) included consideration of the subject site. The fitness/leisure uses alone were not pursued, partly due to challenges with financial sustainability of the uses, and also as Parramatta Leagues Club was considering other uses to support the area and surrounding assets (such as a hotel or serviced apartments).

A number of sites owned by the Club were considered for a hotel (or other uses), but all others had compelling constraints.

The Western Sydney Stadium to the south of the parking, owned and managed by Venues NSW, has approval to develop an exciting modern stadium to host sporting events, games, cultural events and concerts, with a capacity varying from 30,000-40,000 depending on the event. Construction is well advanced and opening is expected in March 2019.

Further to the north, the area has undergone a significant review of planning controls (led by Urban Growth NSW with NSW Planning and Environment), associated with the Parramatta North Urban Transition Precinct. This has included significant changes to core planning controls (zoning, FSR, height). The wider area is undergoing change and is in transition. As previously stated, a number of public authorities are committed to improving the area.

## **2.6 Other Alternatives Considered**

Having regard to the objectives and background above, various options were considered. These are outlined below, together with a commentary:

### **2.6.1 Do Nothing**

This option did not achieve the objectives of the Club, nor the objectives to improve the area.

Importantly, it would not achieve any positive physical outcomes for the site such as removing unsightly parking, nor improve linkages with surrounding public assets of Parramatta Park, heritage assets and Western Sydney Stadium.

It also would retain at-grade parking which can be reasonably accommodated in the adjoining new parking structure.

### **2.6.2 Provide a Leisure Centre only**

This was not financially viable for the Parramatta Leagues Club, which leases the land. While such uses provide a public benefit, the return did not warrant the cost, for a Club which is not subsidised.

Despite this, the notion of providing active fitness and leisure uses was and is suitable for the site and area and is being accommodated, although as ancillary to the hotel.



### 2.6.3 Provide a hotel on another site



**Figure 1** – Other Sites considered (boundaries approximate)

Three (3) other sites were considered to provide a hotel, as illustrated above.

The following table summarises the comparative advantages and disadvantages:

Site	Advantages	Disadvantages
A – 23-29 O'Connell Street	<ul style="list-style-type: none"> <li>Owned by Club</li> <li>Regular shape</li> <li>May support redevelopment of surrounds</li> <li>Mediate to higher planning controls to the north</li> </ul>	<ul style="list-style-type: none"> <li>Relatively small</li> <li>Existing strata units</li> <li>Close adjoining dwellings</li> <li>Low Height and FSR (equivalent of 3 storeys)</li> <li>Would require a Planning Proposal – cost, time and uncertainty</li> <li>Warrants consideration of whole block, not under the ownership or control of the Club</li> <li>Reviewing controls is not a priority for the Council</li> </ul>
B - Parramatta Leagues Club, 17-21 O'Connell Street	<ul style="list-style-type: none"> <li>Owned by Club</li> <li>Large site</li> <li>Support uses</li> </ul>	<ul style="list-style-type: none"> <li>Site shape</li> <li>Existing services and lifts prohibitive</li> <li>Old building</li> </ul>

Site	Advantages	Disadvantages
	<ul style="list-style-type: none"> <li>• More removed from sensitive park and bat colony</li> <li>• Could upgrade building</li> </ul>	<ul style="list-style-type: none"> <li>• Building would need demolition and Club likely relocated</li> <li>• Loading limitations</li> <li>• Redevelopment of Club needs longer timeframe and planning</li> <li>• Potential scale relationship issue with Conservation Area to the east</li> </ul>
C – Existing Multi-story car park site	<ul style="list-style-type: none"> <li>• New structure</li> <li>• Access from Eels Place</li> <li>• Existing parking</li> <li>• Options for eastern site still open</li> </ul>	<ul style="list-style-type: none"> <li>• Carpark base inactive</li> <li>• Compromised entry</li> <li>• Much more sensitive interface with adjoining bat colony and Parramatta Park – visual impacts on park</li> <li>• Public domain compromised</li> </ul>

**Table 3** – Other Sites considered

#### 2.6.4 Provide a Building on this site with other uses (residential, commercial, serviced apartments etc.)

The zoning of the site is Private Recreation RE2 and residential and commercial uses are not permissible. Moreover, they are not really appropriate for the site and precinct.

Serviced apartments were considered. However, this may lead to issues regarding management of tenants and longer term pressure for residential use, not ideally suited to the site.

After balanced consideration of alternatives and considering feedback from authorities (Council and Parramatta Park Trust), the proposed option was considered most appropriate.

## 2.7 Consultation

The following table provides a summary of the required and non-required consultation with agencies in the preparation of the Development Application for the proposed hotel, with reference to the Secretary's Environmental Assessment Requirements (SEARs) dated 6 November 2017.

Agency	Whom, When	Advice/Outcome	Notes
Federal Dept. of	Therese McCarthy, Historic Heritage	- Initially – matters to address after draft HIA sent,	- Subsequent consultation with OEH did raise an issue about extra view modelling, which has been addressed

Agency	Whom, When	Advice/Outcome	Notes
Environment and Energy	Section Department of the Environment and Energy, emails latest 5/10/2018	<ul style="list-style-type: none"> <li>regarding vistas, and 80% control</li> <li>- Agreed not a significant impact</li> </ul>	<ul style="list-style-type: none"> <li>in the Heritage and Visual Impact Assessment.</li> <li>- The issue of a significant impact on the GHFF is a low risk and assessed as not being triggered by Cumberland Ecology following detailed expert review. Further consultation with DoEE can occur as part of the DA assessment process.</li> </ul>
City of Parra' Council	Kim Crestani, City architect, and Guy Pinkerton, Urban Designer + Design Competition Coordinator (DRP process)	<ul style="list-style-type: none"> <li>- Member of the Design Review Panel (DRP), party to final DRP report</li> <li>- Generally and conceptually supportive (no formal feedback other than DRP minutes)</li> </ul>	<ul style="list-style-type: none"> <li>- Meetings occurred prior to the SEARs request and during the DA preparation.</li> <li>- Parramatta City Architect on Design Review Panel, providing valuable knowledge and advice.</li> <li>- Subsequent discussions regarding flooding, engineering, social planner regarding details.</li> </ul>
Office of Govt. Architect	Olivia Hyde, Diana Snape (emails Feb-June 2018 Design Exc. Strategy), Lee Hillam, Senior Design Adviser, chair DRP June-October 2018, 3 DRP meetings (6 June 2018, 31 July 2018 and 18 October 2018)	<ul style="list-style-type: none"> <li>- Agreed to Design Excellence Strategy</li> <li>- Chaired DRP meetings, including Minutes</li> <li>- Final report generally supportive of the preDA scheme and commended a number of elements</li> </ul>	<ul style="list-style-type: none"> <li>- Design development underwent considerable evolution and refinement through the DRP process, addressing a variety of issues related to the public domain, massing, podium, loading, tree retention, setbacks, height, core location and façade development.</li> <li>- Further referral to the DRP post lodgement of the DA could occur.</li> </ul>
Roads and Maritime Services	Robert Rutledge, Senior Land Use Planner, 19/2/2018 (email and phone) Email 20/11/18 with summary from TTPP	<ul style="list-style-type: none"> <li>- "RMS will not endorse any [new] access to O'Connell Street"</li> <li>- Also at meeting with TfNSW on 17/12/2018 (see next item)</li> </ul>	<ul style="list-style-type: none"> <li>- Previously proposed egress to O'Connell Street deleted, access proposed through approved road in adjoining site to avoid a new access road to O'Connell Street</li> <li>- No new access to O'Connell Street is provided.</li> <li>- Ongoing consultation can occur during the DA assessment.</li> </ul>

Agency	Whom, When	Advice/Outcome	Notes
Transport for NSW	Meeting 17/12/18	<ul style="list-style-type: none"> <li>- No formal feedback, discussion mostly on access and options and relationship with Stadium</li> </ul>	<ul style="list-style-type: none"> <li>- Main issues expected to be access, service vehicles, potential for conflict with pedestrians, "best" access and interface with the Stadium.</li> <li>- Ongoing consultation can occur during the DA assessment. Will respond to any issues raised after lodgement.</li> </ul>
Office of Environment and Heritage	<p>Draft Heritage report provided</p> <p>Letter from OEH dated 13/11/18 advised extra matters to address (Sarah Jane Brazil)</p> <p>Draft archaeology report sent 16/11/18</p> <p>Email consult on BDAR 14/11/18 to Shannon Simpson</p> <p>Email from Adrian Hohenzollern 7/12/2018</p> <p>Email Suzanne O'Neill 11/12/2018 (BDAR)</p>	<ul style="list-style-type: none"> <li>- OEH issues in their letter addressed in final heritage report, including extra modelling</li> <li>- OEH will review archaeology report when referred</li> <li>- OEH confirmed the site is not within an important area for the Swift Parrot or Regent Honeyeater</li> <li>- OEH advised "OEH does not require threatened species credits for the three planted <i>Eucalyptus nicholii</i> (Narrow-leaved Black Peppermint) trees. This advice assumes that the vegetation has not been planted for restoration or propagation purposes."</li> </ul>	<ul style="list-style-type: none"> <li>- Site not listed on the State Heritage Register.</li> <li>- OEH (Heritage Branch) aware of Federal review for Federal listing.</li> <li>- Further visual modelling and assessment has been undertaken following OEH review and formal feedback.</li> <li>- Further consultation regarding archaeology can occur as needed</li> <li>- Unexpected finds can be addressed by conditions and covered by NPW Act 1974.</li> <li>- The BDAR assessment is consistent with the advice to date from OEH.</li> </ul>
Environmental Protection Authority	Douglas Partners contacted EPA on	<ul style="list-style-type: none"> <li>- Follow SEPP 55 and associated Guidelines</li> </ul>	<ul style="list-style-type: none"> <li>- Not a polluting use and no license needed.</li> </ul>

Agency	Whom, When	Advice/Outcome	Notes
	22/10/18 to confirm contam'ation processes	<ul style="list-style-type: none"> <li>- Provide an RAP with the DA if needed</li> </ul>	<ul style="list-style-type: none"> <li>- Processes and guidelines for contamination are recognised and understood and followed.</li> <li>- RAP has been provided as required.</li> <li>- Douglas Partners rang to check current applicable Guidelines for contamination</li> </ul>
Sydney Water	Sewer and water diagrams obtained	<ul style="list-style-type: none"> <li>- Obtained sewer and water plans</li> <li>- S73 Certificate will be needed</li> </ul>	<ul style="list-style-type: none"> <li>- Sewer and water plans in EIS (Part 3.5)</li> <li>- Water supply can be ensured with the DA approval</li> <li>- Sewer diversion already occurred with the carpark DA</li> <li>- Services needs well known from adjoining recent carpark</li> </ul>
Parra' Park Trust	Board, Suellen Fitzgerald, CEO, Joshua French, Rob Hird and others, meetings and emails March-July 2018 + DRP meeting observer Stephanie Licciardo and Oriana Senese regarding Gatehouse and heritage background	<ul style="list-style-type: none"> <li>- Gatehouse removed from the scope (following letter of 28 March 2018 and meeting with Board)</li> <li>- Liaison with Lend Lease and Venues regarding access design and integration with southern access road</li> <li>- Granted written owners consent for lodgement of the DA</li> </ul>	<ul style="list-style-type: none"> <li>- Long and ongoing consultation</li> <li>- Owners consent received</li> <li>- PPT assisted with liaison with VNSW regarding access from the southern road.</li> <li>- PPT has undertaken their own further research and work regarding the Gatehouse and other Gatehouses.</li> <li>- Intended the relationship of the hotel and the former Gatehouse will be subject to ongoing communication to find an appropriate outcome for the precinct, integrated to ensure the heritage significance is respected and the public domain enhanced.</li> </ul>
<b>Non-Required Consultation (relative to SEARs)</b>			
Venues NSW	Meetings with Steve Clark, Principal Officer Major Projects	<ul style="list-style-type: none"> <li>- Encouraged liaison with Lend Lease on road and INSW on access agreement, which occurred through several</li> </ul>	<ul style="list-style-type: none"> <li>- Support between VNSW and PPT regarding the northern alignment of the access road to the development.</li> <li>- Proponent for this DA to be responsible for changes to the adjoining approved access way, as needed for the hotel.</li> <li>- Need to formalise owners consent from VNSW and legal access</li> </ul>



Agency	Whom, When	Advice/Outcome	Notes
		meetings and emails	arrangements into the future prior to the DA determination.
INSW	Mal Land, Project Manager, phone	- INSW responsible for delivery of Stadium, not future access arrangements, which is a matter for VNSW	- As above – INSW temporary custodian and needs a secure site to completion of works schedule for the end of March 2019.
Lend Lease (designer of Stadium)	Angus Morten, senior Project Manager meetings April – July 2018 + Helen Jacq with Hassell architects	- Need to align work for access road in terms of northern alignment + levels	- Understood agreement reached in-principle for the northern alignment of the access road between PPT and VNSW - As above, changes to the access road the responsibility of hotel proponent - Connections and levels between hotel and adjoining access road work.
Endeavour Energy	Feb 2015	- Advice to JHA engineers on substation requirements	- Provided for in the design
Water NSW	Wayne Conners 4/12/2018	- Advised if groundwater below basement, not groundwater licence will be needed (phone)	- Groundwater is well below the basement RL (as outlined in the Geotechnical Report)

**Table 4** – Consultation Summary

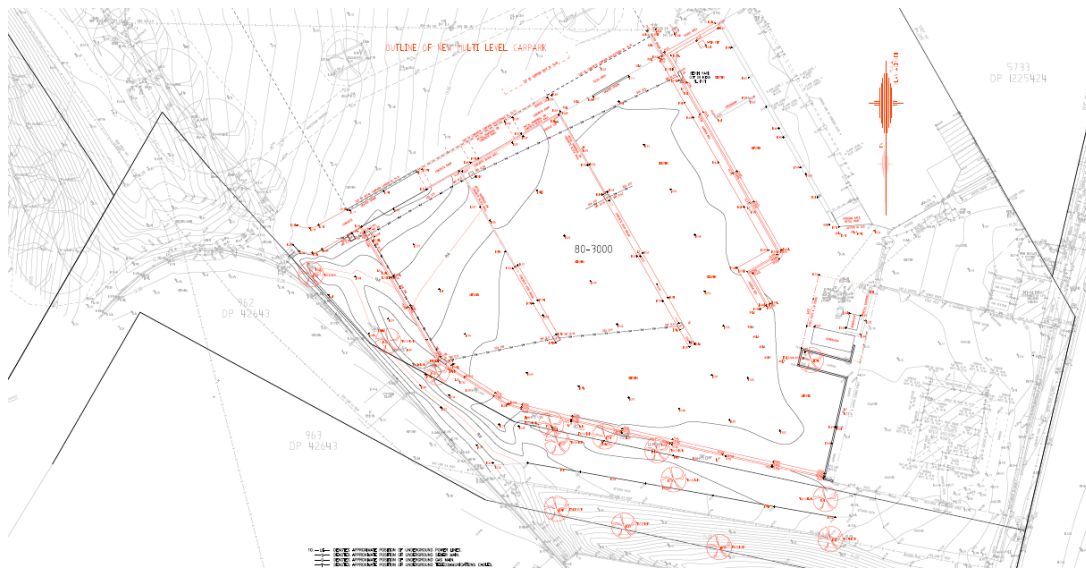


### 3 The Site and Surrounds

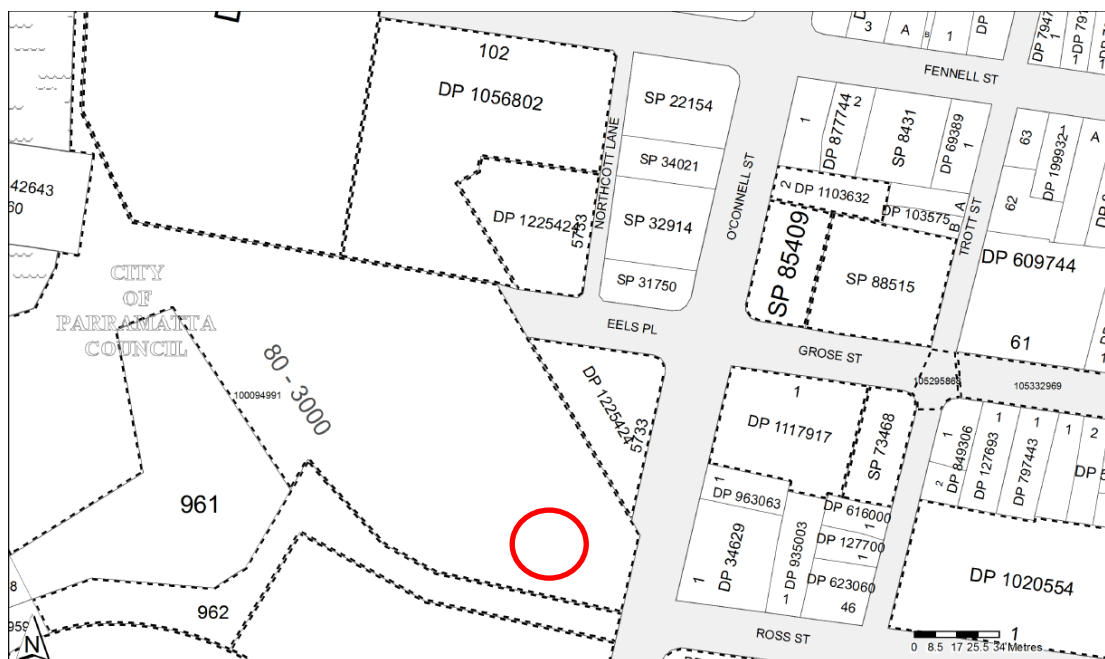
#### 3.1 Legal Description

The site is legally known as Lot 369 in DP 752058, Lot 7054 in DP 1074335 and Residual Crown Plan 80-3000 (Sydney). The DA relates to Residual Crown Plan 80-3000 (Sydney) only, with the proposal depicted on the plans by Hassell and others.

An extract from the site survey, and cadastre information is below (red information depicts recent updates to survey base in location of works and red circle depicts approximate site on cadastre):



**Figure 2** – Survey (LTS Lockley) – red shows updated recent details for proposed hotel



**Figure 3** – Cadastre Information (LTS Lockley and Land Registry Services)

### 3.2 Site Description

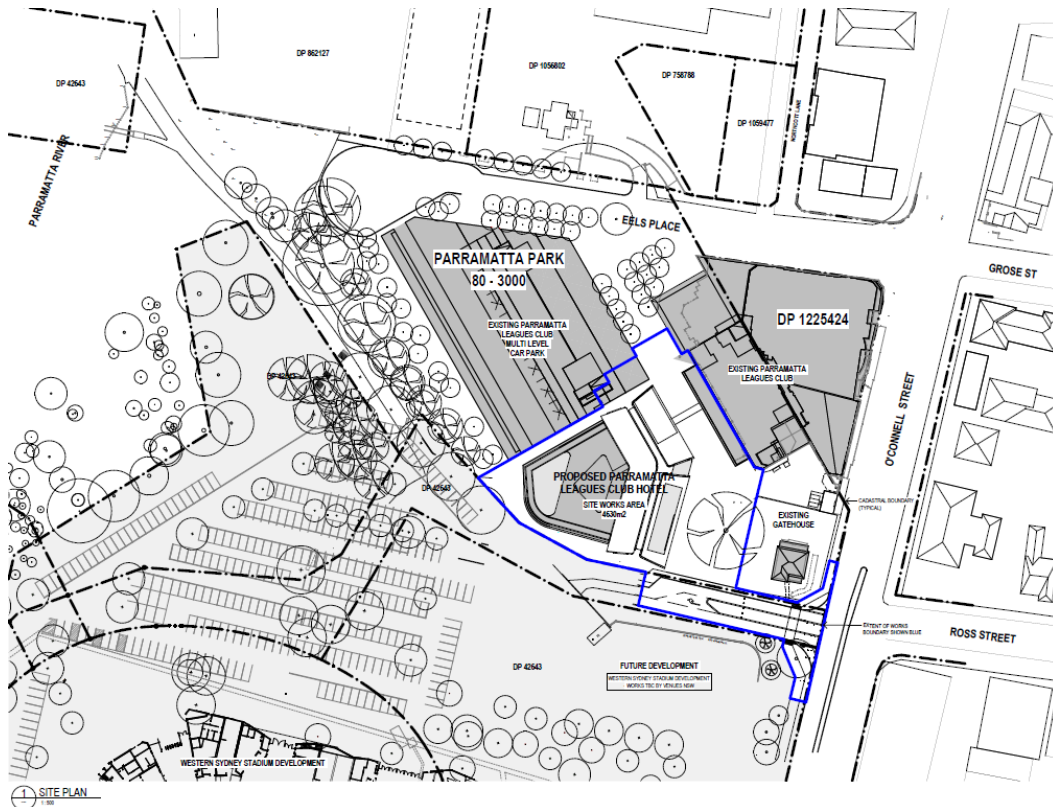
The site is commonly known as 1 Eels Place, Parramatta (although is also variously known as 1 Parramatta Park Land, Parramatta by Parramatta Council, and 17-19 O'Connell Street, Parramatta due to current linkages with Parramatta Leagues Club). It is to the south of the current Parramatta Leagues Club building and north of Western Sydney Stadium (undergoing redevelopment) and currently contains at grade parking on a bitumen surface (94 spaces), trees and services. The site of the building and public domain work has an area of approximately 4,360sqm.



**Figure 4** – Site and surrounds

Source: Google Earth (2016)

The site of the proposed development is illustrated below:



**Figure 5** – Site and surrounds (Hassell)

The following photographs illustrate the site:



**Photo 1** – Existing Leagues Club to the north and carpark to the west of the proposed hotel





**Photo 2** – Existing Leagues Club to the north and large Lemon Scented Gum

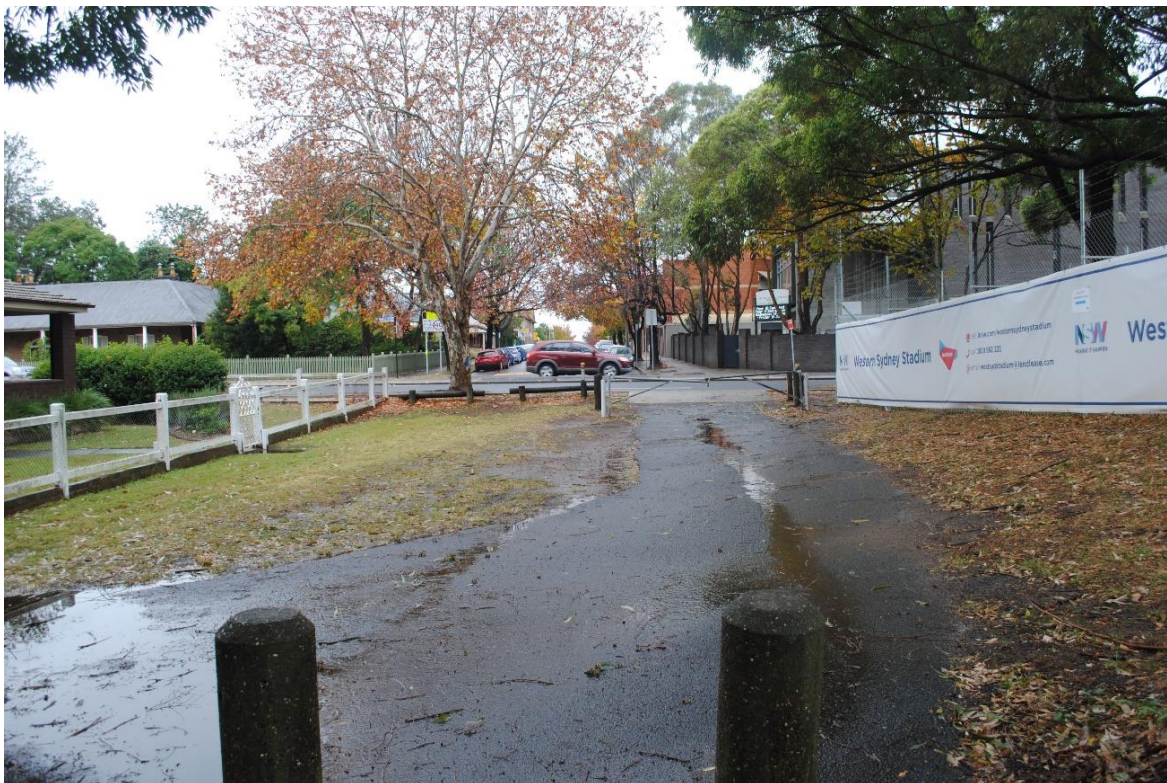


**Photo 3** – Existing Leagues Club (corner of Eels Place and O'Connell St)





**Photo 4** – Leagues Club (right) and existing Cottage – proposed hotel behind tree



**Photo 5** – View east to Ross Street (from proposed access south of hotel)





**Photo 6** – O'Connell Street and existing crossover (proposed access), view north



**Photo 7** – Existing Cottage from southern access road

### 3.3 Ownership and Access

The site of the proposed building is owned by Parramatta Park Trust and is subject to an exclusive lease by Parramatta Leagues Club.

Parramatta Park Trust has granted its consent as owner of the land to the lodgement of the Development Application.

The site of the proposed vehicular access is within lot 962 of DP 42643, which is shown by title search to be owned by Parramatta Stadium Trust



**LAND  
REGISTRY  
SERVICES**  
NEW SOUTH WALES

## Title Search

NEW SOUTH WALES LAND REGISTRY SERVICES - TITLE SEARCH

**Information Provided Through**  
Aussearch  
Ph. 02 9267 9728 Fax. 02 9267 9226

FOLIO: 962/42643

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SEARCH DATE	TIME	EDITION NO	DATE
5/10/2018	7:31 AM	1	19/3/1992

LAND

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LOT 962 IN DEPOSITED PLAN 42643  
AT PARRAMATTA  
LOCAL GOVERNMENT AREA CITY OF PARRAMATTA  
PARISH OF FIELD OF MARS COUNTY OF CUMBERLAND  
TITLE DIAGRAM DP42643

FIRST SCHEDULE

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PARRAMATTA STADIUM TRUST (PA62954)

SECOND SCHEDULE (0 NOTIFICATIONS)

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NIL

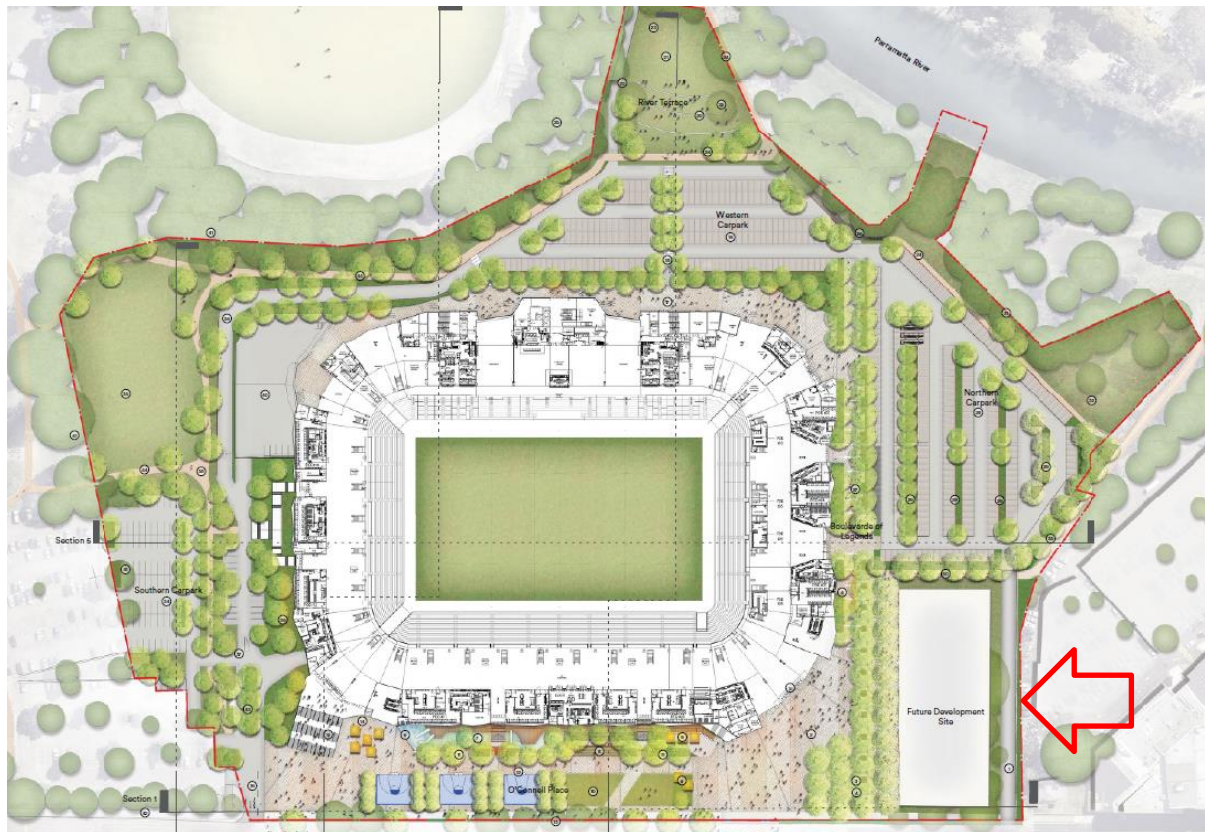
**Figure 6** – Title Search (5/10/2018) of “access” lot

Parramatta Stadium Trust no longer exists (since 2012) and has been subsumed into Venues NSW.

However, the custodianship of the site is currently with Infrastructure NSW, while the Stadium is under construction, with the head contractor being Lend Lease, and this poses some interim challenges in negotiation.

The adjoining accessway has been approved as vehicular and pedestrian access (northern loop road), as part of the approved Parramatta Stadium Development, shown below:





**Figure 7** – Stadium DA approval (SSD 8175), source DPE website, Aspect Studios

The “Stage 1” development approval for the Stadium that preceded the Stage 2 DA included an indicative building envelope for a 20,000sqm building (indicated above, left of the access road and red arrow).

This northern access “road” within the Stadium site is designed and approved for a 6m wide carriageway and involves tree removal in the location of the access road. There has been design refinement of the roadway post DA approval relating to levels and detail by VNSW, in consultation with Parramatta Park Trust (as required by a condition of the DA consent). The road is not a public road but an accessway within the VNSW site, accessing O’Connell Street (left in, left out) and part of an internal loop system accessing parking areas and loading areas within the Stadium site.

For several months, negotiation has been ongoing regarding the design of the access road, with Venues NSW and Lend Lease, seeking to accommodate both the northern access road within the adjoining Stadium site, and access for the proposed hotel.

This negotiation also involves Parramatta Park Trust, as the roadworks, tree removal and works to the property boundary require their consent (and also noting provisions of the Parramatta Park Trust Act which allows transfer of assets between the organisations).

The negotiation essentially involves the applicant for the subject DA seeking to increase the width of the accessway, as the 6m carriageway does not allow commercial trucks (and buses/coaches) to pass, without on-site management. This was indirectly brought about by the former hotel proposal (at SEARs stage) involving a one way loop in and out not being supported

by RMS (who wanted to avoid any new opening on O'Connell Street) and concerns from Parramatta Park Trust due to loss of open space around the former Gatehouse.

The proponent for the subject hotel (and its traffic expert) maintains this widened access road solution will be in the long term benefit of Venues NSW and the State, as it will allow rational access for the future Stage 1 building (given it would not be rational and orderly to access directly from the RMS classified O'Connell Street, while to the south is the main entrance to the Stadium). The solution suggested and depicted on the proposed plans would also improve access to and within the Stadium site generally, while still maintaining a left-in, left-out to O'Connell Street. The proposal also allows access to the proposed hotel, with an improved overall public domain outcome compared to any alternative, which may be possible, but not preferred. The access arrangement was supported by the Design Review Panel, who encouraged the respective organisations to coordinate an appropriate solution.

Formal owner's consent has not been secured from Venues NSW for lodgement of the DA, although from negotiation between the parties there is confidence such approval will be obtained. This would also then entail agreement for formal rights of access. Such understanding does not bind the parties and it is understood the onus for obtaining owner's consent prior to determination of the DA lies with the applicant of the proposed hotel.

### 3.4 Soil and Hydrology

The soil has been subject to considerable testing, as part of the previous DA approval and construction of the carpark (by JK Geotechnics and EIS) and augmented by recent borehole testing supervised by Douglas Partners.

The soil and geotechnical issues have been addressed in the Geotechnical Investigation by Douglas Partners, at Attachment M. Some key aspects and findings are summarised below.

The site is near the boundary between the Hawkesbury Sandstone formation and Ashfield Shale foundation. The soil profile is summarised as:

- Asphalt concrete to 150mm below surface;
- Silt, gravel and sand to 600mm deep;
- Natural soil, clay and traces of gravel and weathered rock to a depth of 5-6m;
- Medium to high strength sandstone generally around 5.5m below the surface.

The soil was tested and found not to be aggressive and of medium to high strength.

The soil is able to support the proposed development, with further testing and inspection by a geotechnical engineer.

The site has an ASS classification of 5 in Council's LEP map, as outlined in Part 5.7 of this Statement. The results of the ASS investigation are contained in the Detailed Site Investigation (at Attachment L). The soils were found to have relatively high acidity, likely due to former metal trace elements than acid sulphate soils.

Previous and recent borehole testing and review shows the groundwater is below RL 7.5. The lowest level of the basement is RL 10.

### 3.5 Existing Improvements and Services

The site contains 94 at-grade parking spaces, within an uneven although generally flat bitumen surface, with interspersed trees, garden beds, dwarf walls and services.

Services are shown on the survey and include generators for the hotel (to the east of the hotel), grease pit, dish drains and stormwater infrastructure.

Other services (gas, telecommunications, sewer, gas) surround the site and are available for the site and redevelopment (see Section 4.4).

### 3.6 Trees, Landscape and Ecology

There are 7 trees on the site:

- A large lemon-scented gum to the west of the former Gatehouse and east of the proposed hotel; and
- 6 trees adjoining the southern boundary, which include 3 x Narrow Leaf Peppermint trees, 1 x Flooded Gum and 2 x Spotted Gums, varying from 11m-21m high.

There is also a further tree on VNSW land to the south of their proposed access road, which requires removal due to the proposed widening of this access for the hotel.

Further information about these trees can be found in the Arborist's report at Attachment I.

The landscape qualities of the site are limited, due to being a bitumen carpark, with some isolated trees and no understorey.

The trees do not contain any hollows. The Narrow Leaf Peppermint trees are vulnerable, although are not endemic to the area. The trees do not form any significant colony or habitat for the surrounding area, as found from inspection and analysis by Cumberland Ecology (refer to Attachment J).

There is a nearby colony of Grey-Headed Flying Foxes, to the west within Parramatta Park, approximately 110m from the site.

### 3.7 Heritage and Archaeology

The site is not listed as a heritage item or within a Conservation Area. The site is not listed within any Local, State or Federal Instruments.

The site does adjoin the former Gatehouse, which is not a heritage item, although is listed on the Section 170 Register of Parramatta Park Trust.

There is a Heritage Conservation Area and heritage items to the east, across O'Connell Street.

The site is in the vicinity of Old Government House Domain, listed in the Council Parramatta LEP, State Heritage Register, Register of the National Estate and World Heritage List (latter being part

of 11 convict sites), generally to the south and west of the site. The site is also in the vicinity of the Parramatta North Historic site, to the north of the site.

Further information about the heritage significance of the area is contained in Attachment G and in Sections 5 and 6 of this report.

### 3.8 Surrounds

The nearest residential uses are a residential (convent) component of Our Lady of Mercy College, to the east of the site across O'Connell Street and residential uses along Eels Place and Northcott Lane to the north. To the north-west, across Eels Place (being a western extension of Grose Street) is the Northcott site, a not-for-profit facility assisting elderly people. Adjoining that facility is a carpark owned by the Leagues Club and buildings containing residential uses fronting Eels Place and Northcott Lane.

The Western Sydney Stadium, undergoing redevelopment and scheduled to be complete in March 2019, is to the south of the site. This will accommodate 30,000-40,000 people at capacity, depending on the nature of the use.

To the east across O'Connell Street are a mix of residential, business and educational uses.

Further to the north is the North Parramatta Urban Transformation Area and various heritage assets, generally adjoining Parramatta Park.

Surrounding development is mixed, although is dominated by recreational, sporting and entertainment uses in and around Parramatta Park, Western Sydney Stadium and the Leagues Club building itself. Old Government House is located further to the south, across Parramatta River, approximately 700m from the site.



**Photo 8** – View west across Eels Place to sites owned by the Leagues Club





**Photo 9** – View eastwards from bridge across Parramatta River



**Photo 10** – path to the S-W of site, east of Parramatta River





**Photo 11** – Northcott facility and basement parking to the north of site



**Photo 12** – Adjoining Stadium under construction from near southern boundary of the site





**Photo 13** – Our Lady of Mercy College across O'Connell Street to the east



**Photo 14** – View across O'Connell Street to the north-east





**Photo 15** – View to the site from within Ross Street (bus in O'Connell St)



**Photo 16** – Stadium under construction from Victoria Road





**Photo 17** – View towards the site from Victoria Road (behind trees)



**Photo 18** – Nearest residential tower to the south-east from Victoria Rd (550m from site)

## **4 Proposal**

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### **4.1 Overview**

The proposal involves the demolition of existing improvements and erection of a 17 storey hotel building (plus a single level basement for services) accommodating 209 rooms and including the lower 4 levels containing a café, pool, fitness/recreational uses and a function room ancillary to the hotel. Access is proposed from O'Connell Street to the south of the building (via an access road to the adjoining Parramatta Stadium), and the proposal includes public domain works and services upgrades surrounding the building to integrate the building with the surrounding area and infrastructure.

No additional parking is proposed, given the adjoining approved large carpark. Loading occurs to the north of the building, diagonally opposite the existing loading area to Parramatta Leagues Club.

The proposal is depicted within the conceptual plans by HASSELL, as attached to this Statement.

### **4.2 Site Preparation, Demolition and Excavation**

Demolish existing improvements, as depicted on the demolition plan. This will be guided by Australian Standard 2601. There is minimal demolition, as the site is an at-grade carpark. Existing services for the Club can be relocated.

Trenching to the west, as recommended by the archaeologist, would occur relating to the potential former “mud lodge” (see Archaeological assessment recommendation at Attachment H).

Excavation is proposed for the required basement (to approximately RL 10 AHD), with shoring to meet engineering specifications. Remediation would also occur, guided by the Remediation Action Plan prepared by Douglas Partners, consistent with the requirements of SEPP 55 – remediation of Land and associated Guidelines.

### **4.3 Tree Removal**

Seven (7) trees are proposed to be removed, close to the southern boundary. A large Lemon Scented Gum is being retained and will be a feature. Six (6) of these are within the site (and native) and one is required for the localised changes to the southern access road (which is exotic).

The 6 trees to be removed on the site include 3 x Narrow Leaf Peppermint trees, 1 x Flooded Gum, 2 x Spotted Gums and the 1 exotic tree on the VNSW site is a London Plane tree. These trees vary from 8m-21m high.

Further information about these trees can be found in the Arboricultural report at Attachment I and BDAR report at Attachment J.

The proposed Landscaped Plan includes new tree planting to a total of 11 mature native trees, including replacement gum trees (Scribbly and Spotted), more appropriately positioned to

enhance the public domain. This excludes additional planting recommended in the wind assessment report, which can be accommodated.



**Figure 8 – Proposed Tree Removal (Hassell)**

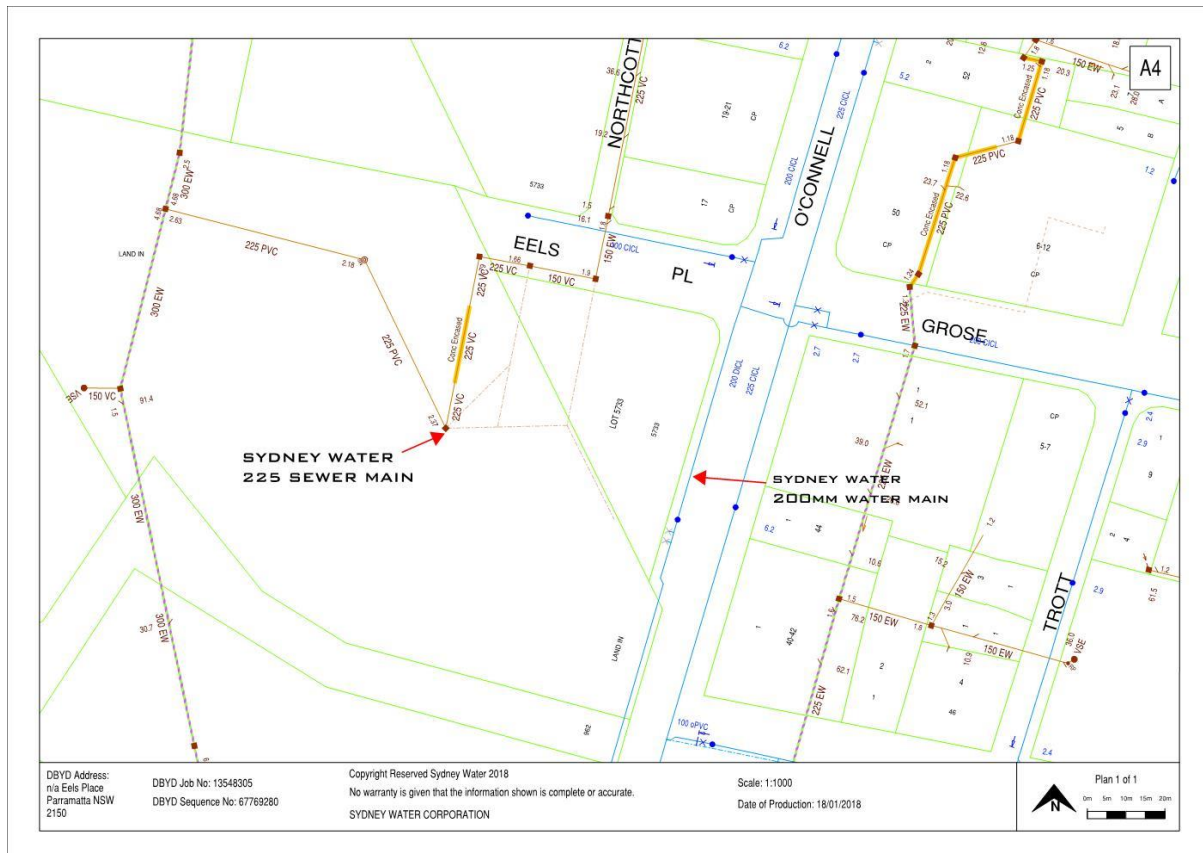
#### 4.4 Services

The proposal seeks to connect to existing services. This includes:

##### Sewer

There is a Ø225mm Sydney Water sewer main available for connection for the proposed Hotel Development, located to the north-west, diverted as part of the Carpark redevelopment project.

There is sufficient capacity in the Sydney Water sewer to cater for the proposed load expected from the development (source: JHA).



**Figure 9 – Sewer and Water Infrastructure (source: JHA)**

### Water

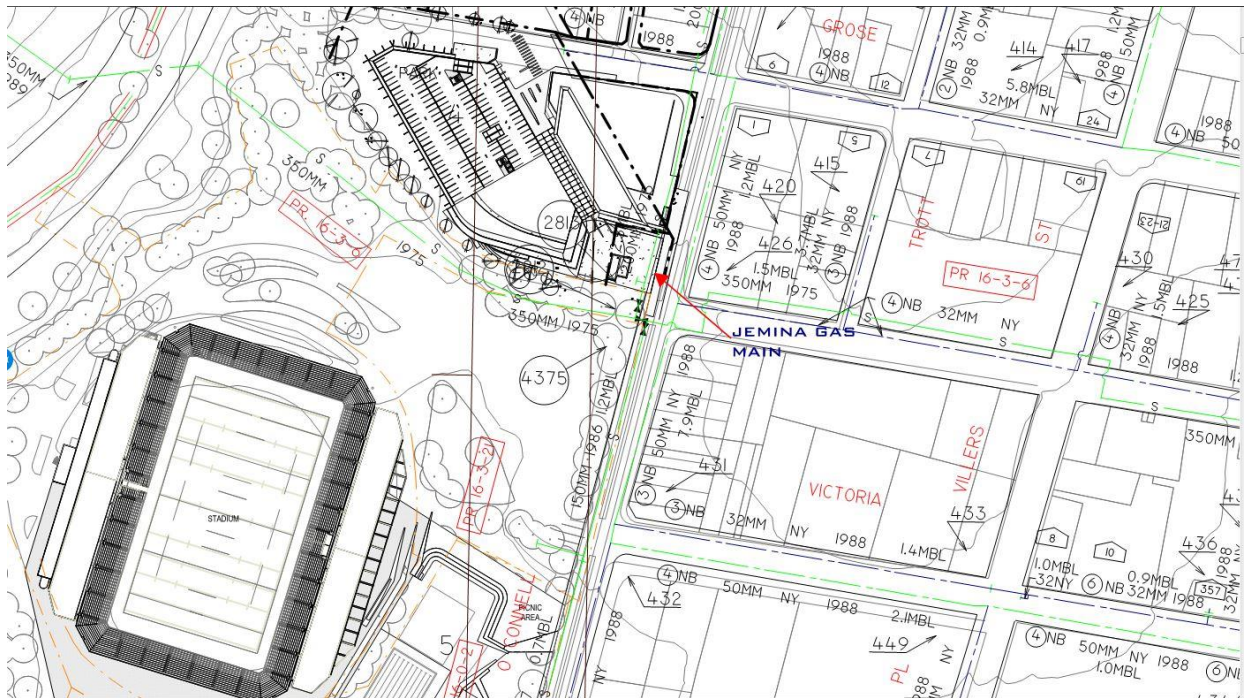
There is a Sydney Water Ø200mm water main located in O'Connell Street available for connection for the proposed Hotel Development, located on the eastern side of the proposed Hotel Development.

There is sufficient flow capacity in the Sydney Water Ø200mm water main to cater for the proposed load required for the development for both potable water requirements and fire services requirements (source: JHA). Pumps will be required for the cold water and fire services to maintain the pressures required under the Australian Standards. If approved, a Section 73 application can be lodged with Sydney Water to confirm the sewer and water services availability and any requirements.

### Gas

Jemena Gas mains are located in O'Connell Street and are available for connection. The proposed Hotel Development, located on the eastern side of the proposed Hotel Development. There is a secondary main 1050kPa and a network main 210kPa available for connection subject to the gas application. There is sufficient capacity in the Jemena gas mains to cater for the proposed load required for the development (source JHA).





**Figure 10** – Jemena Gas Infrastructure (source: JHA)

### Stormwater and OSD

The stormwater is able to be connected into the OSD system and infrastructure installed as part of the adjoining recent carpark development (linking to Eels Place). This has been designed to cater for the needs of the proposal. Refer to the Stormwater and Flooding report by TTW at Attachment R.

### Electricity

The development is within the Endeavour Energy supply authority network area. Located in close proximity to the development are two padmount transformers: Padmounts 6256 (1) and 6256 (2). JHA engineers have reviewed the 30 minute incremental Meter data for the last 7 years and determined that there is insufficient capacity in these padmounts to service the new hotel.

As such, a new substation will be installed to service the development. The proposed size is 1500kVA transformer.

Substation No.	Transformer No	Transformer Size	Last MDI Reading	Last Recorded Date
6256	1	1000kVA	787.5kVA	14/05/2013
	2	1000kVA	525.0kVA	14/05/2013

**Table 5** – Substation Requirement

The above information provided by Endeavour Energy 6 February 2015.

### Telecommunications

To enable the connection to a provider such as Optus, Telstra or others to provide a dedicated service, communication ducts will be taken from O'Connell Street via the southern access road and installed to the Hotel premises providing a pathway for the selected provider(s).

The building will provide a superior wireless service enabling email, social media and the like.

## **4.5 Proposed Uses**

The proposal is principally a hotel. This is the principal purpose of the development, having regard to NSW DPE Planning Circular PS 13-001, dated 21 February 2013.

There are other ancillary uses within the base of the building and at the rooftop. These include a pool, café, gym, function room, health-related uses and bars.

Context surrounding the proposal is required. The hotel is utilising the assets of the adjoining Parramatta Regional Park and Stadium to target healthy living, and also the opportunity to accommodate sporting teams, groups and corporations, where healthy living and recreation is important. This is aided by the setting. In turn, the proposed ancillary uses of a gym, wellness, fitness and function/gathering spaces for groups supports the use of the hotel and the market segment it is directed to.

There may be scope, and expected to be so, for the uses in the podium of the building to be available for Parramatta Leagues Club members and members of the public. However, the primary and principal purpose of the uses is to support the hotel.

A breakdown of uses within levels of the proposed building is contained in Section 4.8 below, within Building Works.

## **4.6 Numerical Overview**

The key numerical aspects of the proposal are included in the plans by Hassell. The following table summarises key aspects of the proposal:

Aspect	Proposal	Comment
Site Area	4,630sqm/10,510sqm	4,630sqm is the area of the development works, 10,510sqm is the area including the carpark (which is on the same lot) - Hassell
Hotel Beds	209	Range of room types
Total Gross Floor Area (GFA)	13,364sqm	No GFA of FSR limit on the site
GFA Pool and Fitness Uses	3,685sqm	No GFA of FSR limit on the site
GFA Hotel	9,989sqm	No GFA of FSR limit on the site



Aspect	Proposal	Comment
FSR	3.11:1/1.37:1	Depends on site area used (see above)
Height	62m (approx.) – RL 75	No height limit on the site - 66m height limit to the north in PNUT area
Storeys	17 + basement	Slight change from SEARs, same overall height
Parking Spaces	0	Accommodated in existing carpark to the west on Parramatta Leagues Club licensed area (total 773 spaces)

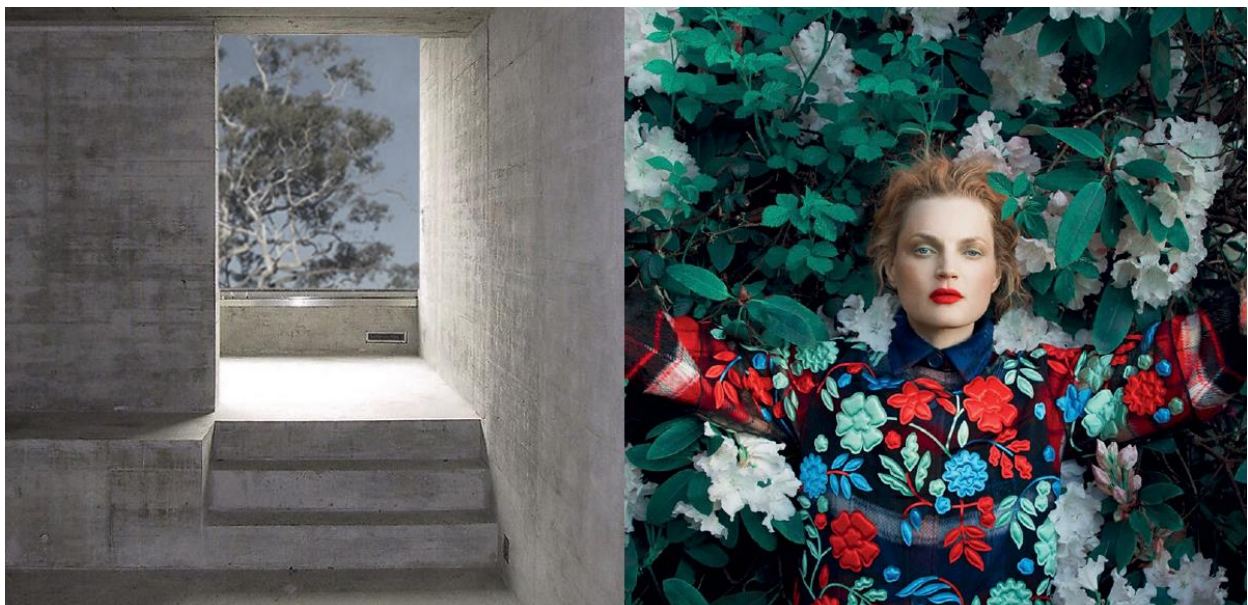
**Table 6** – Key Development Statistics

#### 4.7 Cost/Capital Investment Value

The Capital cost of the proposed development is \$125.7 million, excluding GST. This is shown in detail in the Cost report by WT Partnership at Attachment X.

#### 4.8 Building Works and Design

Hassell have provided Architectural Plans and a Design Report, within the Attachments (A and D). The Design Report includes the concept of a "hotel in the park", as a point of difference, as well as the differences in market focus towards groups, teams and corporate clients. In terms of materiality, a concept of a raw urban base, with a point of difference, celebrating the park setting and views, is put forward.



**Figure 11** – Design Imagery (Hassell)

The following provides a summary of the building works and uses across various levels of the building:

Basement:

- Part of the building footprint above;
- Storage, Plant and staff rooms;
- Water tank (to the south);
- Substation;
- Services connections;

Ground:

- Loading area (to the north-east);
- Public domain, landscaping and access works (see sections below);
- Hotel lobby;
- Licensed café and associated licensed outdoor area;
- Pool/fitness lobby;
- 25m pool including shallower side children's pool area;
- First Aid Area;
- Kitchen;
- Office;
- Lifts and amenities;

Level 1-2:

- Fitness, gym, associated areas;
- Wellness areas;
- Sauna and spa;
- Lifts, stairs and access;
- Change areas and amenities;
- Offices;
- Juice Bar;
- Consultation rooms (physio etc.);
- Storage;

Level 3-4

- Function Room (500 pax), able to be split into 2;
- Bridge to existing Club (Level 3);
- Smaller function spaces and pre-function areas;
- Associated outdoor terrace;
- Kitchen/bar/servey;
- Meeting rooms; foyer, circulation, amenities;
- Storage;
- Fitness and wellness space;
- Roof terrace above;

Levels 5-15:

- Podium roof terrace;
- Hotel rooms;
- Service areas;

- Circulation;

#### Level 16:

- Plant;
- Bar;
- Roof terrace;
- Function area/conference room.

### **4.9 Public Domain and Landscaping**

The public domain works are depicted on the ground floor plan and the Landscape Plans by Hassell (Attachment B). The public domain includes paving works, garden beds, trees, lighting and furniture, designed to augment spaces and connections within the areas surrounding the building.

### **4.10 Access and Loading**

Loading for the new hotel and the Club will be from the southern access road, which makes use of an access road and reduces vehicular/pedestrian conflicts within and around the site (access from Eels Place still remains in emergencies).

Vehicular access to the adjoining carpark (for those using the hotel or facilities and accessing by car), will also be via Eels Place, as for users of the current carpark.

The access to and from the porte-cochere is limited to drop off (taxi's, ride share etc.), coaches (such as a team bus) loading and emergency vehicles. This use will be less frequent and the space is given visual primacy to pedestrians by the paving and public domain treatment. This access to the porte-cochere is proposed from the northern access road within the adjoining Venues NSW site, south of the hotel.

As outlined in the Executive Summary, at the SEARs stage, a new exit point to give loop access was previously proposed to O'Connell Street. This was not supported by Roads and Maritime Services (RMS), as O'Connell Street is a classified road and new access points are generally avoided by RMS where other options may exist. The exit was also of some concern to Parramatta Park Trust in terms of the impact on the pedestrian environment.

The removal of the prior egress to O'Connell Street required the review of the proposed southern access, which fortunately is an access road approved as part of the adjoining Western Sydney Stadium development approval. The access road is within the land owned by Venues NSW (VNSW). This access location was supported by the Design Review Panel, as alternatives would adversely affect the public domain and an important pedestrian environment in a busy area.

However, the width of that access road only allows standard cars to pass each other, with any truck or bus movement relying on an on-site managed situation (by VNSW). The proposed access for the hotel involves a widening of the approved road access, which would ultimately also benefit the future approved "Stage 1" building of 20,000sqm to the south of the access road, as other access to O'Connell Street or the south would not be possible or desirable. This issue has

been the subject of considerable discussion between the proponent for the hotel, VNSW and PPT. While there is confidence an agreement will be reached between the parties, with some high level in-principle support, actual written owner's consent has not been obtained for the proposed access from VNSW for the DA lodgement. This is on the understanding that such approval (and access rights) will need to be agreed prior to the determination of the Development Application.

The proposed vehicular access has been guided by traffic and waste experts to ensure turning circles meet Australian Standards.

In terms of pedestrian movements, these exist in a variety of directions, to the building and surrounding area. The principles underpinning such access are outlined in the Landscape Plans and the Design Report. During game days, pop-up stalls to the north of the hotel (within an undercroft area of the Leagues Club Building to the north) will help further activate the area and assist with surveillance of the public domain, which is a recommendation of the CPTED report. The CPTED Report is contained at Attachment F, and makes a number of recommendations regarding public domain detailing.

#### **4.11 Car Parking**

No additional parking is being provided as the adjoining carpark (containing 773 spaces) meets the parking demand.

#### **4.12 Signage**

No signage is proposed as part of this DA. It is noted there are restrictions on the provision of rooftop signage given the adjoining OGHD heritage precinct.

#### **4.13 Staging**

The proposal is not a staged DA. It is possible staged Construction Certificates may be issued, if this suits market segments (e.g. demolition and excavation). The building is expected to be built in one stage,

#### **4.14 Construction Management**

An Environmental, Construction and Site Management Plan is contained at Attachment O. The Traffic and Parking report also addresses construction traffic. A draft Construction Traffic Management Plan is also contained in the Traffic and Access Impact Assessment, at Attachment K

#### **4.15 Operational**

Operational aspects are addressed in the Plan of Management (Attachment V) and the Waste Management Plan (Attachment U). Various technical reports make recommendations (e.g. acoustic report), which affect the building operation.

The Plan of Management includes measures to consider amenity of the area, staffing, security, hours of operation, CCTV, licensing, training and the like.

In terms of the hours of operation, the following is proposed:

- The hotel will operate 24 hours a day, 7 days a week.
- The function room will operate from 7am until Midnight Sundays to Wednesdays and until 2am following Thursday to Saturday nights.
- The café will operate from 6am-midnight, 7 days a week.
- The pool, fitness and wellness centre will operate from 6am-midnight, 7 days a week.

## 5. Statutory and Policy Considerations

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### 5.1 Environmental Planning and Assessment Act 1979 (EPA Act 1979)

This is the overarching Act for development assessment in NSW.

The Objects of the EPA Act 1979, within Section 1.2, are:

- (a) *to promote the social and economic welfare of the community and a better environment by the proper management, development and conservation of the State's natural and other resources,*
- (b) *to facilitate ecologically sustainable development by integrating relevant economic, environmental and social considerations in decision-making about environmental planning and assessment,*
- (c) *to promote the orderly and economic use and development of land,*
- (d) *to promote the delivery and maintenance of affordable housing,*
- (e) *to protect the environment, including the conservation of threatened and other species of native animals and plants, ecological communities and their habitats,*
- (f) *to promote the sustainable management of built and cultural heritage (including Aboriginal cultural heritage),*
- (g) *to promote good design and amenity of the built environment,*
- (h) *to promote the proper construction and maintenance of buildings, including the protection of the health and safety of their occupants,*
- (i) *to promote the sharing of the responsibility for environmental planning and assessment between the different levels of government in the State,*
- (j) *to provide increased opportunity for community participation in environmental planning and assessment.*

The proposal can reasonably be considered consistent with these objects, noting:

- (a) The social and economic welfare of the community is well served by the proposal. Environmental aspects and impacts are outlined and addressed in this Statement. The proposal will have no significant impact on natural or other resources, yet will make better use of existing resources, with a use that complements the area and existing infrastructure.
- (b) Ecologically sustainable development is addressed below.
- (c) The development is orderly and rational, being consistent with the applicable planning controls and providing a use suited to the site and area. Access and integration with the surrounds is well-considered.
- (d) Affordable housing is not provided, yet is not compromised elsewhere.
- (e) The environment is appropriately protected through the design and mitigation measures. Threatened and other species of native animals and plants, ecological communities and

their habitats are appropriately protected and addressed in an expert ecological and arborists report.

- (f) The proposal is consistent with protecting built and cultural heritage, both Aboriginal and European, addressed in expert reports regarding both areas of consideration.
- (g) A high quality design is proposed, guided by a design excellence strategy and process, and the amenity of the area is reasonably protected.
- (h) High quality materials are proposed, assisting in maintenance and also designed with guidance by BCA and access expertise to ensure appropriate protection to the health and safety of occupants.
- (i) The process has allowed consideration of both Federal and State issues related to the proposal in one process.
- (j) Community participation will be facilitated by the processes associated with the assessment of the proposal.

## 5.2 Ecologically Sustainable Development

As within the Objects of the Act cited above, Ecologically Sustainable Development is a key objective for new development.

The definition, consideration and conceptualisation of Ecologically Sustainable Development (ESD) was well explained by Justice Preston in *Telstra Corporation Limited v Hornsby Shire Council* [2006] NSWLEC 133. This included the “basic formulation” of “development that meets the needs of the present without compromising the ability of future generations to meet their own needs”:

Six Principles can be considered and applied:

- 1) Sustainable use - the aim of exploiting natural resources in a manner which is “sustainable” or “prudent” or “rational” or “wise” or “appropriate”;
- 2) Effective integration of economic and environmental considerations in the decision-making process;
- 3) The precautionary principle (referred to in 6(2)(a) of the Protection of the Environment Administration Act);
- 4) Inter-generational equity - the present generation should ensure that the health, diversity and productivity of the environment are maintained or enhanced for the benefit of future generations;
- 5) Conservation of biological diversity and ecologically integrity should be a fundamental consideration; and
- 6) Internalisation of environmental costs into decision-making for economic and other development plans, programmes and projects likely to affect the environment.

In regard to these principles, it is reasonable to conclude the proposal is consistent with the principles of ESD, given:

- There will be minimal natural environmental impacts. The proposal is designed to respond to flooding considerations and seeks to make use of natural access to light and air, while allowing for water-reuse;



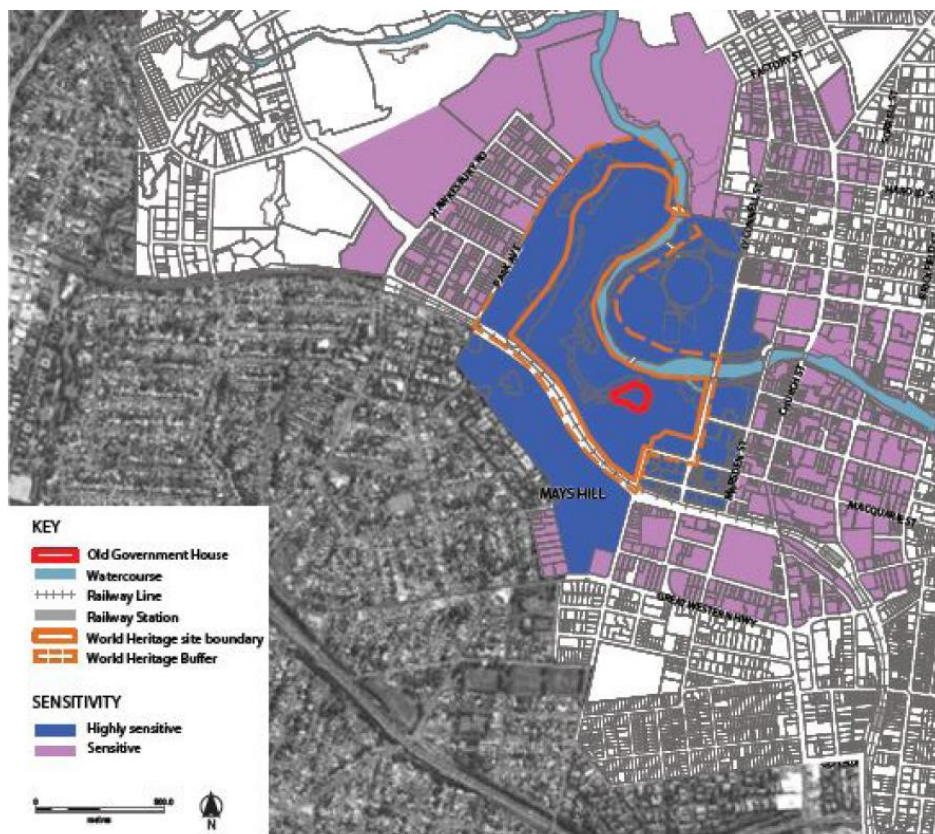
- There will be positive economic outcomes, yet not at the expense or significant impact upon environmental considerations;
- There are not considered to be any threat of serious or irreversible harm or scientific uncertainty to warrant a precautionary principle;
- The proposal will provide an asset for future generations, as Parramatta and Western Sydney grows;
- There are no significant impacts on biodiversity occurring either on the site of the development or nearby, with impacts closely considered by an ecological expert;
- Costing of impacts is more a matter for government policy than a development proposal. However, income from the proposal in terms of application fees, contributions and a lease fee for use of the land to the State would arise from approval of the proposal.

### 5.3 Environment Protection and Biodiversity Conservation Act 1999 (“EPBC Act”)

There are two relevant considerations regarding this Act, as below:

#### (a) Heritage Impacts

The site is in the vicinity of the Old Government House and Government Domain (OGHGD), which is listed as one of 11 former convict sites on the UNESCO World Heritage list and also listed in the National Heritage List (on 1 August 2007). Accordingly, the site is subject to the provisions of the EPBC Act. The site is identified as having “High Sensitivity” in the Technical Guide by Planisphere (2012) accompanying the listing:



**Figure 12** – World Heritage Listing – Development in Parramatta Technical Guide, Planisphere 2012

While the site is located outside the “buffer zone” as identified on the NSW State Heritage Register, any proposal which has a potential “significant impact” on an item within the National Heritage List requires an approval from the Federal Government under the EPBC Act.

The author of the Heritage Impact Statement (Purcell) has engaged directly with Federal Department of Environment and Energy, including providing a draft assessment report and updated report following feedback. This report concluded that the proposal would not constitute a significant impact and therefore would not require Federal Government approval.

By email dated 5 October 2018, Therese McCarthy, from the Historic Heritage Section of the Department of the Environment and Energy reviewed the updated report and in summary advised:

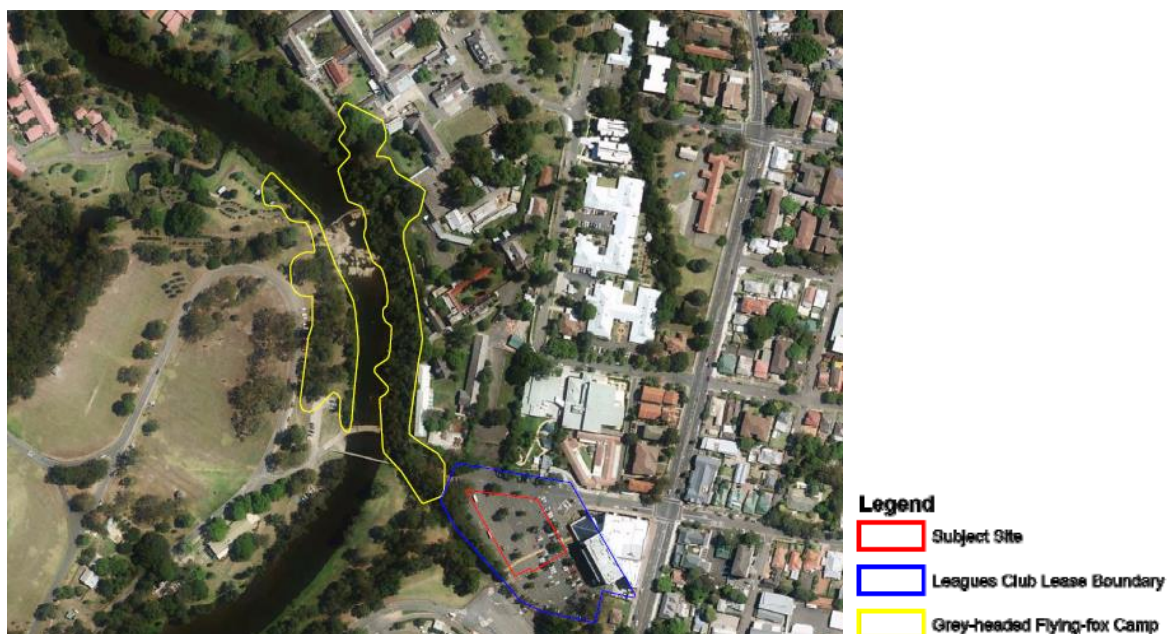
*Overall, I believe that the Heritage Impact Assessment comprises a thorough self-assessment which considers all the requirements of the Conservation Agreement. We appreciate you consulting with us throughout this process and the level of detail provided on the project.*

## (b) Ecological impacts

The site is also in the vicinity of a Grey-Headed Flying Fox (“GHFF”) colony (to the north-west of the site as shown below), which is a protected species under the EPBC Act.

A referral has not been made to the DoEE prior to the lodgement of the DA. Cumberland Ecology has concluded the proposal would not trigger a significant impact. This is understandable, given the adjoining carpark and Stadium development, which are closer to the colony did not trigger such an impact or approval. And given the separation, intervening carpark building (providing some shielding) and nature of the proposal.

This matter can be subject to further consultation with the DoEE during the development assessment process.



**Figure 13** – GHFF Colony – Cumberland Ecology

A report by Cumberland Ecology makes a number of recommendations to appropriately consider, reduce and mitigate the indirect impact on the GHFF colony, particularly through construction.

#### **5.4 Other Acts and Approvals**

A number of other Acts are relevant to the proposal, as outlined below. Brief commentary on those acts, and approvals where relevant, is included.

##### **a) Protection of the Environment Operations (POEO) Act 1997**

No approval under this Act is needed. However, provisions to protect the environment and the amenity of surrounding land (Including any future noise nuisance) is within the ambit of this Act.

##### **b) Roads Act 1993**

O'Connell Street is a classified road and the NSW Roads and Maritime Services (RMS) is the responsible road authority for the proposed access arrangements.

It is not entirely clear if a Roads Act approval will be needed, for two reasons:

1. The title of the land for both the subject site owned by Parramatta Park Trust and the adjoining site owned by Venues NSW extends to the kerb (which is unusual and unlike the privately owned Leagues Club site to the north).
2. Venues NSW are undertaking roadworks to O'Connell Street and the works to O'Connell Street may be both approved and built prior to determination.

However as the proposal does involve some widening of the access road to VNSW land to O'Connell Street, it is assumed approval from RMS would be needed.

No Roads Act approval from Council is anticipated.

##### **c) Liquor Act 2007**

A Liquor license would be needed for the hotel, including the licensed café, bars etc. and any associated outdoor areas. This would need to be consistent with the development approval.

Hours of operation are included within the subject application.

##### **d) Water Management Act 2000**

Given the measured watertable is below the basement, an aquifer interference approval would not be required from Water NSW. This is the advice provided by Douglas Partners

##### **e) National Parks and Wildlife (NPW) Act 1974**

Given the findings of the Aboriginal and Archaeological Assessment by Austral Archaeology (Attachment H), no approval under this Act is anticipated.

However, there is the possibility of unexpected finds, which are governed by the provisions of this Act.

#### **f) Local Government Act (LGA) 1993**

Council approval for the stormwater connection is expected to be required.

As stated previously, the OSD and system put in place for the adjoining carpark has been designed to cater for the proposed development and is already installed.

Consultation has occurred between the hydraulic engineer for the project (TTW) and Council's stormwater engineer.

#### **g) Public Health Act 2010**

The operation of the premises, including pool and spa areas accessible for public use, would be governed by the provisions of the Public Health Act, including Division 3.

### **5.5 Planning Strategies and Policies**

The following table provides a summary response to various applicable Planning Strategies and Guidelines (as outlined in the SEARs):

<b>Policy/Direction</b>	<b>Consistent?</b>	<b>Comments</b>
<b>NSW State Priorities</b>	Yes	<p>The proposal is consistent with the following priorities (within the 12 key priorities):</p> <ul style="list-style-type: none"> <li>• Creating jobs (from the jobs during construction and operation);</li> <li>• Delivering Infrastructure (as the use will support infrastructure and is an important part of the accommodation infrastructure to support uses directed at Tourism in Parramatta);</li> <li>• Keeping the Environment Clean (by avoiding development of a "greenfield site" and appropriate water and sustainability initiatives);</li> <li>• Making Housing Affordable (by helping make Parramatta and the western Sydney region more attractive, in turn taking price and space pressures off eastern areas of the City);</li> <li>• Tackling Childhood Obesity (by providing fitness and wellness uses and supporting the active and recreational facilities in the area).</li> </ul>
<b>A Plan for Growing Sydney</b>	Yes	<p>The proposal is consistent with a key direction of creating a metropolis of 3 cities, specifically supporting the future role of Parramatta as a major CBD.</p>



		<p>The proposal is also consistent with the 10 key directions of this Plan, being specifically consistent with:</p> <ul style="list-style-type: none"> <li>• A City supported by Infrastructure;</li> <li>• A Collaborative City (working with State agencies and delivering on State land and no cost to the taxpayer, yet significant return);</li> <li>• Creating jobs (from the jobs during construction and operation);</li> <li>• A city of Great Places, by improving the surrounding area and pedestrian experience;</li> <li>• Jobs and skills for the city, by greater employment and employment choices;</li> <li>• A City in its landscaped, with a well-considered landscape integration, guided by leading Landscape Architects;</li> <li>• A efficient city, by avoiding urban sprawl; and</li> <li>• A resilient city by a use supporting jobs and cultural assets.</li> </ul> <p>The proposal will specifically support Parramatta as a more global CBD.</p>
<b>Towards our Greater Sydney 2056</b>	Yes	<p>The proposal helps underpin efforts to transform the City, particularly efforts to enhance Parramatta as a CBD and “Central Sydney” generally. By greater investment towards the geographic centre of Sydney, this also enhances options and life for those in western Sydney, while also relieving some pressure to the east.</p> <p>The proposal is consistent with the “Western Sydney City Deal” by supporting wider infrastructure and government investment.</p> <p>The proposal is sustainable and helps deliver more compact cities with less overall travel.</p>
<b>West Central District Plan</b>	Yes	<p>The proposal is consistent with key directions to provide greater jobs in the West Central Region (while also indirectly supporting business and thereby business viability and employment in the CBD).</p> <p>Liveability and attraction to Parramatta will also be supported by the type of use proposed, which supports other surrounding uses and attractions.</p>
<b>Guide to Traffic Generating Developments (RMS)</b>	Yes	<p>This is addressed in the Traffic and Parking Impact Assessment by TTPP. The traffic impacts are reasonably reduced by not increasing parking supply and allowing a range of access options to be utilised.</p>

<b>Sydney's Bus Future 2013</b>	Yes	The proposal is proximate to major bus infrastructure, helping support such use and its efficiency. The design allows and improves coach access to and from the site (and the adjoining Stadium).
<b>Sydney's Walking Future 2013</b>	Yes	The proposal significantly improves the pedestrian environment and makes more sensible and rational pedestrian linkages around the site to important infrastructure. This in turn assists healthy living and use of surrounding assets.
<b>Sydney's Cycling Future 2013</b>	Yes	The proposal has very good access to cycling paths and infrastructure. This is shown in the Urban Design report by Hassell and the Traffic and Parking Assessment by TTPP.
<b>NSW Planning Guidelines for Walking and Cycling</b>	Yes	As above, the proposal integrates the public domain and linkages with pedestrian and cycling frameworks and infrastructure in the surrounding area.
<b>NSW Long Term Transport Masterplan</b>	Yes	The proposal supports integration of land use and transport, while also sustainably not increasing overall parking supply. The use is counter-cyclical to other peak demand at both Parramatta Leagues Club and Parramatta Stadium and will also support the Parramatta Light Rail initiative.
<b>Better Placed – An Integrated design policy for the built environment of NSW</b>	Yes	The proposal has arisen from a recent initiative of the Office of Government Architect regarding design excellence for urban SSD projects. The proposal is considered to exhibit design excellence and a high quality built environment and surrounding public domain.

**Table 7 – State Planning Policies Summary**

As shown below, the site is proximate to the current proposed draft Parramatta Light Rail link, is approximately 1km from Parramatta Station and has good bus accessibility.

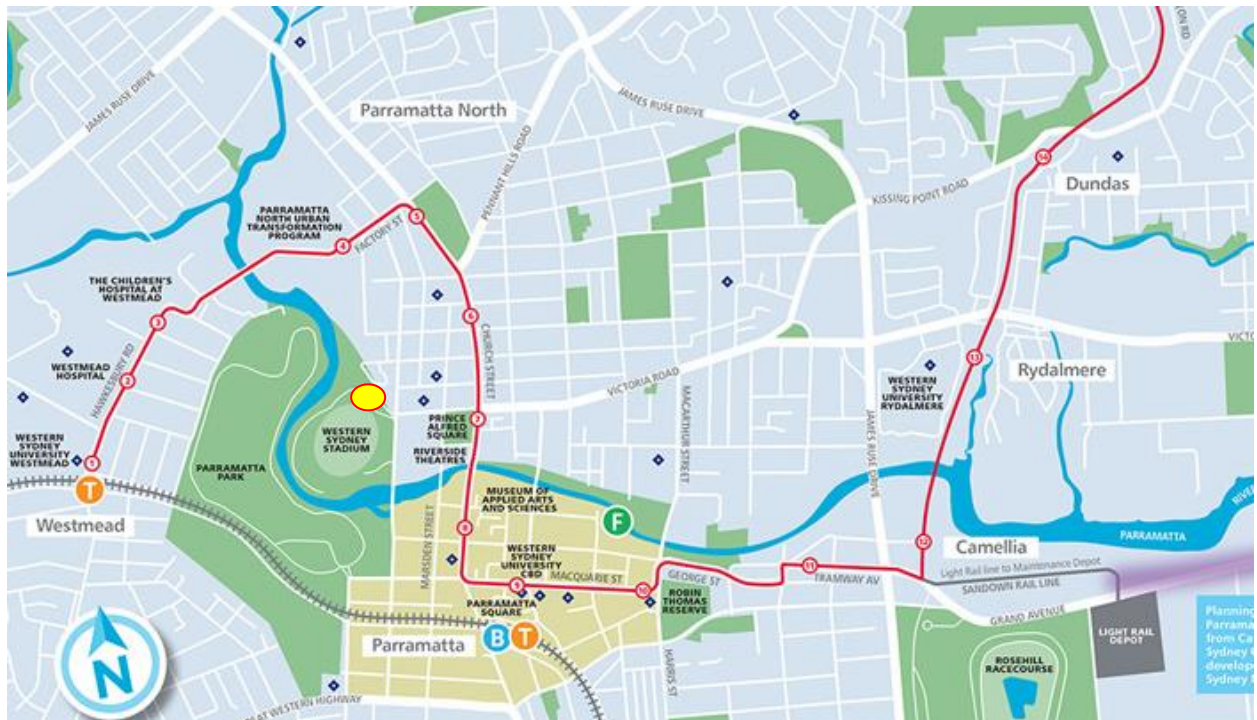


Figure 14 – Current draft Light Rail link relative to the site

## 5.6 State Environmental Planning Policies

### (a) SEPP (State and Regional Development) 2011

Pursuant to Clause 13(2) of Schedule 1 of the *State Environmental Planning Policy (State and Regional Development) 2011* (SEPP SRD), development for the following purposes is State Significant Development (SSD):

*Development for other tourist related purposes (but not including any commercial premises, residential accommodation and serviced apartments whether separate or ancillary to the tourist related component) that:*

- (a) *has a capital investment value of more than \$100 million, or*
- (b) *has a capital investment value of more than \$10 million and is located in an environmentally sensitive area of State significance or a sensitive coastal location*

The proposed development has an estimated Capital Investment Value (CIV) more than \$100M (excluding GST), and is not located in an environmentally sensitive location. This \$100M threshold is exceeded whether or not the lower podium levels of the building (containing ancillary indoor recreation uses such as a pool, gymnasium and wellness centre) are included in the proposed cost.

The proposed hotel development is targeted to a market segment which includes group hotel and sporting team bookings, although not exclusively. Indoor recreational uses are integral to this.

The costs of components of the development are outlined in the attached Cost Opinion by WT Partnership. The costs can be summarised as follows:

- (a) Cost of Hotel, hotel plant, function uses, hotel bar, access, landscaping, servicing + related costs using the definition of CIV: \$103.9 million;
- (b) As for (a) + pool: \$108 million;
- (c) Whole development using the definition of CIV: \$127.7 million;

## **(b) SEPP (Infrastructure) 2007 ("ISEPP")**

No additional parking is proposed, and the referral provisions of Schedule 3 of the SEPP would not be triggered for RMS (unless considered a "commercial premises", as the GFA is above 10,000sqm). Despite this, the site does have frontage to a classified Road, being O'Connell Street.

In terms of Clause 101 of the ISEPP, the proposal includes direct access to O'Connell Street, which is a classified Regional Road, although in the location of an approved access road for Parramatta Stadium, with some refinements for more efficient operation. Clause 101 of the SEPP states:

### **101 Development with frontage to classified road**

(1) *The objectives of this clause are:*

- (a) *to ensure that new development does not compromise the effective and ongoing operation and function of classified roads, and*
- (b) *to prevent or reduce the potential impact of traffic noise and vehicle emission on development adjacent to classified roads.*

(2) *The consent authority must not grant consent to development on land that has a frontage to a classified road unless it is satisfied that:*

- (a) *where practicable and safe, vehicular access to the land is provided by a road other than the classified road, and*
- (b) *the safety, efficiency and ongoing operation of the classified road will not be adversely affected by the development as a result of:*
  - (i) *the design of the vehicular access to the land, or*
  - (ii) *the emission of smoke or dust from the development, or*
  - (iii) *the nature, volume or frequency of vehicles using the classified road to gain access to the land, and*
- (c) *the development is of a type that is not sensitive to traffic noise or vehicle emissions, or is appropriately located and designed, or includes measures, to ameliorate potential traffic noise or vehicle emissions within the site of the development arising from the adjacent classified road*

The proposal is consistent with the above objectives and the proposal provides safe and efficient access.

The proposal is not overly sensitive to traffic noise (being for short term accommodation as opposed to permanent accommodation). The traffic volumes of O'Connell Street are below a daily volume of 40,000 vehicles, known from the traffic study for the adjoining carpark and verified by TTPP in their traffic assessment. Notwithstanding this, an acoustic assessment has been undertaken, by JHA (Attachment Q).



The access arrangements proposed have the potential to benefit the adjoining Stadium and the adjoining Parramatta Park, both owned and managed by the State. Close ongoing consultation with RMS, Parramatta Park Trust, Venues NSW and Council will be required so that an appropriate outcome can be realised.

**(c) SEPP 19 (Bushland in Urban Areas)**

A small part of the site adjoins land zoned for public recreation. In accordance with Clause 9(2) of the SEPP, regard needs to be given to impacts on adjoining bushland.

The proposal will not adversely affect adjoining bushland and the proposal is supported by expert reports from an arborist and an ecologist.

**(d) SEPP 55 – Remediation of Land (SEPP 55)**

SEPP 55 aims to provide for a State-wide consistent planning approach to the remediation of contaminated land, with various objectives and provisions, particularly to reduce the risk of harm to human health and the environment.

Clause 7 of the SEPP requires the consent authority to consider whether a site is contaminated and whether the site is suitable for the proposed use (before or after remediation).

The proposal is supported by expert consideration in accordance with the SEPP and associated guidelines, undertaken by Douglas Partners. This included consideration of prior results, updated soil sampling, testing and a Remediation Action Plan (at Attachment L).

This detailed analysis found some traces of asbestos and metal trace elements. This led to a conclusion within the Detailed Site Investigation that a Remediation Action Plan was needed.

A Remediation Action Plan has been provided.

This process of a RAP and validation processes is able to be addressed by conditions of approval. As such, there should be no reasonable grounds to expect the site cannot be made suitable for the proposed use for hotel and ancillary fitness and wellness uses, as required by the SEPP.

**(e) SEPP 64 – Advertising and Signage**

No signage is proposed.

**(f) SEPP (Vegetation in Non-Rural Areas) 2017**

The proposed tree removal (7 trees) is relatively minor and more than offset by new native tree planting.

The considerations relating to tree removal are addressed in the attached Arboricultural report by New Leaf Arboriculture and the BDAR report by Cumberland Ecology.

### (g) Sydney Regional Environmental Plan (Sydney Harbour Catchment) 2005

The site is subject to the provisions of State Regional Environmental Plan (Sydney Harbour Catchment) 2005 applies ("the REP"). This REP is a deemed SEPP. Part 2 of the REP outlines 11 planning principles for development to which the Plan applies. Many relate to development of land below MHWL, which is not applicable to the proposal. The following more general principles are relevant to the subject proposal and land above MHWL:

- a) *development is to protect and, where practicable, improve the hydrological, ecological and geomorphological processes on which the health of the catchment depends,*
- b) *the natural assets of the catchment are to be maintained and, where feasible, restored for their scenic and cultural values and their biodiversity and geodiversity,*
- f) *development that is visible from the waterways or foreshores is to maintain, protect and enhance the unique visual qualities of Sydney Harbour,*
- j) *development is to protect and, if practicable, rehabilitate watercourses, wetlands, riparian corridors, remnant native vegetation and ecological connectivity within the catchment,*

The proposal is consistent with these and other principles and provisions of the Plan. The proposal is relatively minor in the context of the REP, will not be visible from the Harbour or Parramatta River and will not affect harbour foreshore access or natural processes.

### 5.7 Parramatta Local Environmental Plan 2011

The following table summarises the provisions of PLEP 2011 as it applies to the site:

Matter (PLEP 2011)	Control
Zoning	Private Recreation RE2
Land Reservation	NA
Floor Space Ratio (FSR)	NA
Height Limit	NA
Heritage	No – vicinity First Government House and an Items/Area to the east across O'Connell Street
Acid Sulphate Soils	Class 5
Additional Permitted uses	NA
Flooding	Yes
Natural Resources	NA
Riparian Land/Waterways	NA
Foreshore Building Line	NA
Key Sites/Additional uses	NA
City Centre Controls	No

**Table 8** – Parramatta LEP 2011 Key controls for the site

Commentary on aspects of the LEP is provided below:

**a) Aims of the Plan**

The aims of PLEP 2011 are contained in Clause 1.2 and state:

- (a) *to encourage a range of development, including housing, employment and recreation, that accommodates the needs of the existing and future residents, workers and visitors of Parramatta,*
- (b) *to foster environmental, economic, social and physical wellbeing so that Parramatta develops as an integrated, balanced and sustainable city,*
- (c) *to identify, conserve and promote Parramatta's natural and cultural heritage as the framework for its identity, prosperity, liveability and social development,*
- (d) *to improve public access to the city and facilitate the maximum use of improved public transport, together with walking and cycling,*
- (e) *to minimise risk to the community in areas subject to environmental hazards, particularly flooding and bushfire, by restricting development in sensitive areas,*
- (f) *to protect and enhance the natural environment, including areas of remnant bushland in Parramatta, by incorporating principles of ecologically sustainable development into land use controls,*
- (g) *to improve public access along waterways where natural values will not be diminished,*
- (h) *to enhance the amenity and characteristics of established residential areas,*
- (i) *to retain the predominant role of Parramatta's industrial areas,*
- (j) *to ensure that development does not detract from the economic viability of Parramatta's commercial centres,*
- (k) *to ensure that development does not detract from the operation of local or regional road systems,*
- (l) *to ensure development occurs in a manner that protects, conserves and enhances natural resources, including waterways, riparian land, surface and groundwater quality and flows and dependant ecosystems,*
- (m) *to protect and enhance the viability, identity and diversity of the Parramatta City Centre and recognise it as the pre-eminent centre in the Greater Metropolitan Region,*
- (n) *to encourage development that demonstrates efficient and sustainable use of energy and resources in accordance with ecologically sustainable development principles*

The proposal is consistent with these objectives. The use supports employment, workers and visitors of Parramatta. The proposal appropriately conserves and respects heritage assets and assists in a liveable and enjoyable city. Access is rational and appropriate. Flooding impacts are appropriately resolved and the proposal protects high value natural assets and communities. Residential areas are not compromised, nor other employment areas. Water quality and management is appropriately considered and designed into the proposal, while the proposal represents sustainable development principles (as previously outlined).

## b) Zoning

The site is zoned RE2 Private Recreation under Parramatta Local Environmental Plan 2011 (LEP) and is not subject to any land reservations. The proposal is *Tourist and visitor accommodation*, which is permitted in the zone and other uses within the building are ancillary to this primary purpose. In any event, indoor recreation uses are also permitted in the zone.

The following objectives apply to the zone:

- *To enable land to be used for private open space or recreational purposes.*
- *To provide a range of recreational settings and activities and compatible land uses.*
- *To protect and enhance the natural environment for recreational purposes.*
- *To identify privately owned land used for the purpose of providing private recreation, or for major sporting and entertainment facilities which serve the needs of the local population and of the wider Sydney region.*

The proposal is consistent with the zone objectives, by providing a use which supports private (and public) recreation and major sporting and entertainment facilities nearby. This is occurring on a site within the wider Parramatta Park that has minimal comparative or relative impacts compared to other locations.

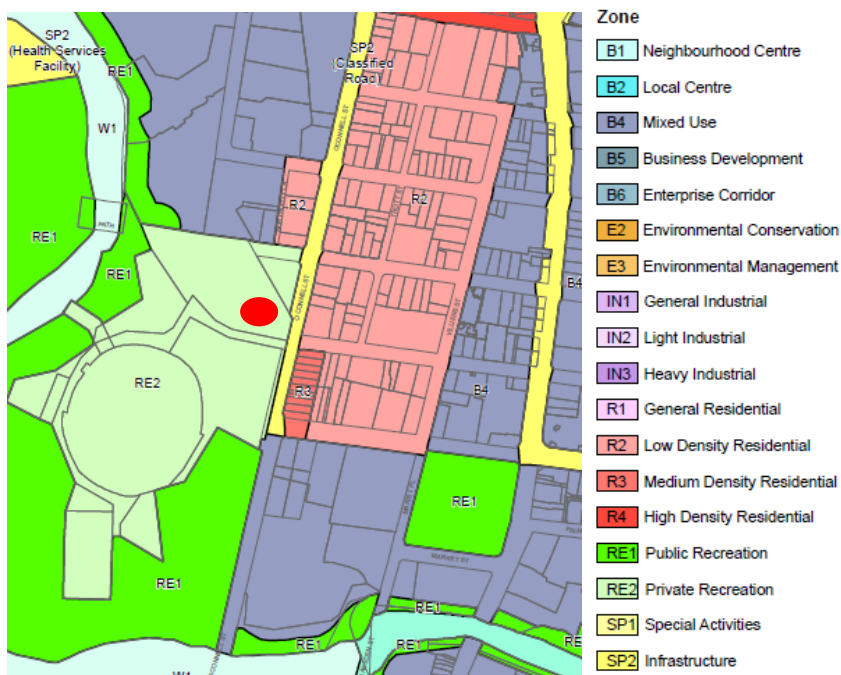


Figure 15 – Zoning Extract PLEP 2011

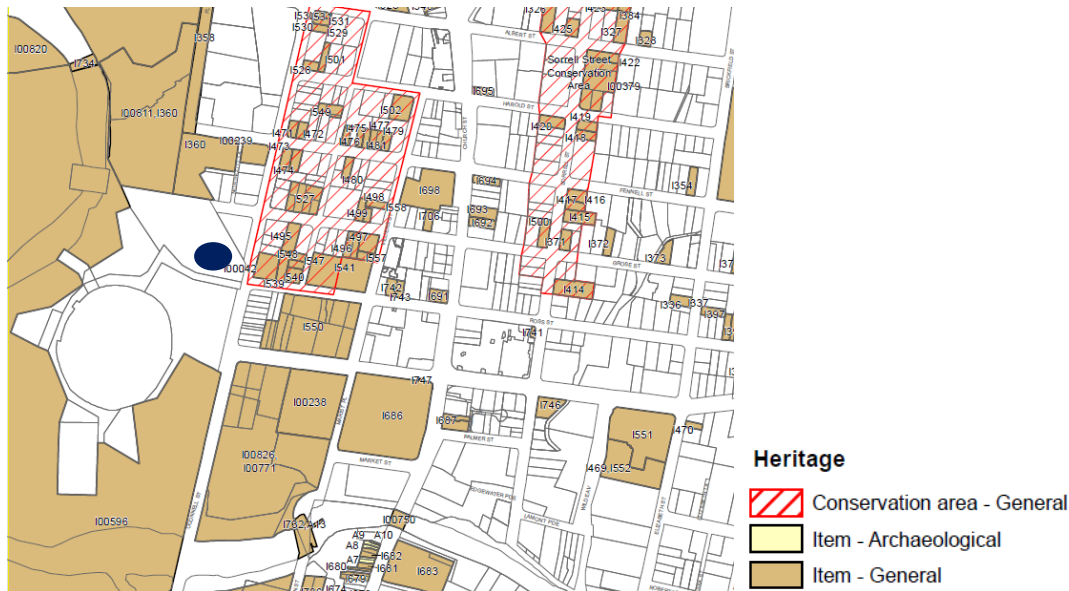
## c) Heritage

The site of the proposed development does not contain a heritage item and is not located in a Heritage Conservation Area. However, the site does adjoin and/or is in the vicinity of heritage items of international, national, State and local significance. The site is also opposite a Heritage



Conservation Area to the east (across O'Connell Street), while the Gatehouse is listed on Parramatta Park Trust's s170 register.

The heritage aspects of the proposal are addressed in the attached Heritage and Visual Impact Assessment by Purcell (Attachment G).



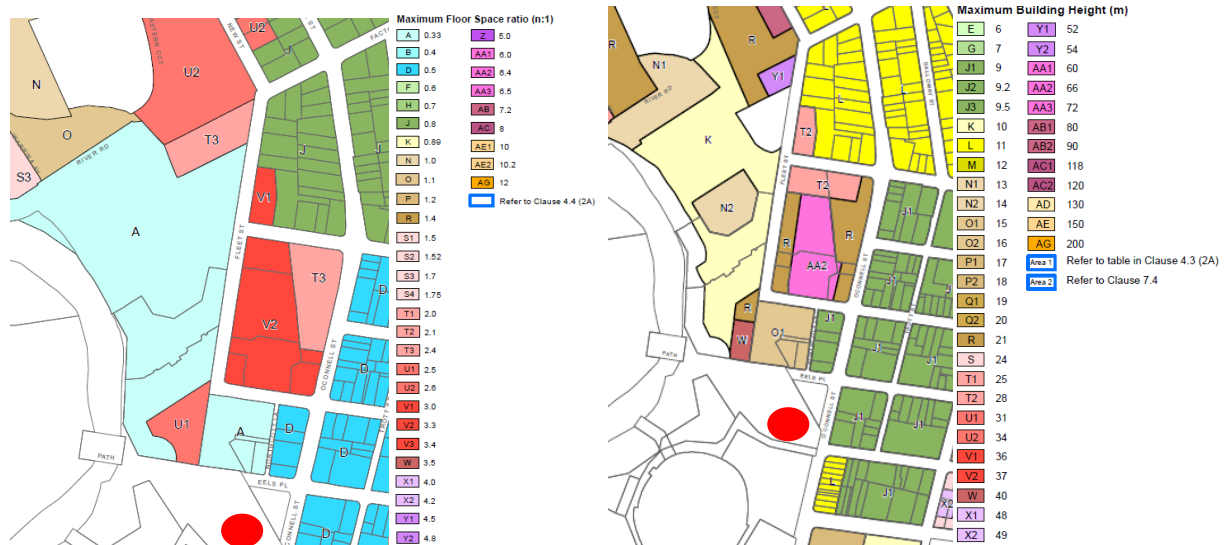
**Figure 16 – Heritage Extract, PLEP 2011**

#### **d) FSR and Height**

The site is not subject to a height or FSR standard in the LEP. This does not mean that any height or FSR is acceptable.

The proposal has arisen from careful and detailed consideration of the surrounding context, including the recently approved Stadium development and heights within the PNUT Area to the north. It also arose from considering key views and vistas from the surrounding park, OGHD and North Parramatta heritage sites.

The height of the proposal (at a maximum of RL 75, approximately 62m above ground) mediates between the heights of the Stadium and the heights permitted to the north of the site (up to 66m). The height limits of nearby blocks include to 40m north-west of the site and up to 66m two blocks to the north.



**Figure 17 – FSR and Height Map Extracts, PLEP 2011**

While there is a lack of development standards that typically apply to new development, the proposal has been assisted by a detailed design analysis and review by an independent Design Excellence Panel, chaired by the Office of Government Architect, which closely considered the context of the site in reviewing the proposal prior to lodgement. It is anticipated this Panel would review the DA, although this is a matter for the NSW Department of Planning and Environment.

Other aspects of the proposal (flooding, earthworks, biodiversity protection and water protection) are addressed in the relevant expert reports attached to this Statement or within this Statement itself.

Consideration of all applicable provisions of PLEP 2011 supports granting consent to the proposal.

## 5.8 Parramatta Development Control Plan (PDCP) 2011

As a SSD, DCPs are not legally applicable to the proposal.

However, it is intended to consider and respond to provisions of the DCP as relevant to the proposal.

The following Parts of the DCP are considered relevant to the proposal:

- PART 1: Introduction
- PART 2: Site Planning
- PART 3: Development Principles
- PART 4: Special Precincts
- PART 5: Other Provisions

It is noted that Part 4 of the DCP applies to Special Areas and Precincts.

The site is outside the area of applicability for both the PNUT Area (to the north and north-west of the site) and also outside the City Centre Area, which is to the south. However, there are provisions in the City Centre Section of the DCP (Part 4.3) which seek to directly or indirectly apply to the

site. These relate to heritage, with a views and vistas diagram and a provision seeking to limit height on the site such that 80% of the height of buildings are below the tree line from identified key vistas in the DCP. The views and vistas from First Government House identified in the DCP and associated Conservation Agreement are addressed within the attached Heritage and Visual Impact Assessment. Importantly, the proposal complies with the “80%” control in the DCP, with the two relevant vistas directed to the site in the DCP being such that the proposal is essentially at or below the tree line.

In terms of Part 1 of the DCP, these are matters of administration, such as relationship with other plans and background information.

In terms of Part 2 (Site Planning) of the DCP, the following table responds to the provisions of the DCP:

Provision/Clause	Comply	Comment
Design in Context (Clause 2.1)	Yes	The site is contextually appropriate. A design report has been submitted with the DA. This includes contextual considerations with the surrounding area.
Requirements for a DA (Clause 2.2)	Yes	The required information to enable environmental assessment of the proposal has been submitted.
Site Analysis (Clause 2.3)	Yes	A site analysis and more fulsome Design Report have been submitted with the DA.
Site Considerations (Clause 2.4)	Yes	Views and vistas have been comprehensively addressed in the Heritage and Visual Impact Statement, with further visual impact analysis in the Design Report.
Views and Vistas		Water Management has been addressed in the Flooding/Stormwater report. The land use category is not high risk.
Water Management/ Flooding		In terms of soil management (and contamination), this is addressed in the Geotechnical Investigation and R.A.P.
Soil Management		In terms of air quality, the use is not a polluting use and emissions are captured by the PEO Act, as well as standard DA conditions. No further parking of cars is provided, and site parking constrained, while the site has good access to other forms of non-car travel. Additional planting will assist with cleaner air.
Air Quality		
Sloping Land		The site is relatively flat and provisions relating to sloping land do not apply.
Land Contamination		The site is not located on the <i>Natural Resources – Biodiversity Map</i> or on the <i>Natural Resources – Riparian Land and Waterways Map</i> in the LEP.

Provision/Clause	Comply	Comment
Biodiversity		The public domain is a positive aspect of the proposal and is supported by a CPTED assessment.
Public Domain		

**Table 9** – DCP Part 2 Summary Table Response

In terms of Part 3 of the DCP, many of the provisions relate to residential and mixed use development in other zones, with a general lack of specific provisions for open space zones and/or hotels. Notwithstanding this, a response to Part 3 of the DCP is provided in the table below:

Provision/Clause	Comply	Comment
Building Envelope (Clause 3.1)	Yes/NA	The site is not subject to a height limit (in metres or storeys) in PLEP 2011. The principles of height transition have been respected by the proposal.
Building Elements (Clause 3.2)	Yes	<p>The proposal is consistent with the 5 objectives of this part of the DCP. The proposal is also consistent with the design principles, with a form that relates well to existing buildings and the site, with due regard to surrounding amenity and interface with surrounding land. The Urban Design Report articulates the design philosophy of the proposal, with the form and detail modulated and articulated appropriately for the site and proposal.</p> <p>In terms of energy efficient design, the ESD report outlines the approaches and commitments undertaken, while the design makes use of natural light, ventilation and landscaping.</p> <p>In terms of the streetscape, the site is well setback from O'Connell Street and allows a rational definition of the public domain, respecting the wider City grid. The use and uses activate the interface to the east of the carpark and towards O'Connell Street.</p>
Environmental Amenity (Clause 3.3)	Yes	<p>In terms of landscaping, detailed landscaping plans have been provided (as well as an Arboricultural Impact Assessment and Ecological assessment). The proposal is consistent with the 9 objectives within Part 3.3.1 of the DCP. The open space requirements relate to residential development and other forms of development and are not applicable to the proposal.</p> <p>In terms of visual and acoustic privacy, the proposal will not cause adverse impacts on surrounding land due to the</p>



Provision/Clause	Comply	Comment
		<p>nature of the use, separation between buildings, landscaping and site features.</p> <p>In terms of solar access and cross ventilation, the use is not one which is required to provide for internal solar access/ventilation, although the proposal does provide good solar access and ventilation. The proposal will not cause overshadowing impacts of any significance upon the use and enjoyment of surrounding land.</p> <p>The proposal is consistent with the principles of Water Sensitive Urban Design and will allow improved stormwater treatment compared to the existing situation.</p> <p>In terms of waste management, a detailed Waste Management Plan has been submitted with the proposal in accordance with Council's specifications. The use is not one which requires waste removal by Council and waste removal from the completed building will be undertaken by commercial contractors.</p>
Social Amenity (Clause 3.4)	Yes	<p>The site is not within a zone or area requiring an Arts Plan in the DCP. Despite this, the intent of improvements to the public domain is achieved by the proposed landscaping and public domain works.</p> <p>In terms of accessibility, the BCA assessment addresses overall accessibility. In terms of safety and CPTED principles, the proposal will improve overall surveillance and activation around the site, with improved opportunities for lighting.</p>
Heritage (Clause 3.5)	Yes	<p>A detailed Heritage and Visual Assessment Impact Statement is attached, with a separate Archaeological and Aboriginal Impact Assessment. The site is not a listed heritage item and is not within a Heritage Conservation Area.</p>
Movement and Circulation (Clause 3.6)	Yes	<p>No additional parking is provided, and overall access is well considered and rational. Loading is provided yet minimised to limit impacts on activation of the public domain, while turning circles have guided the design of access.</p> <p>A detailed Parking and Traffic Report has been undertaken by TTPP, as contained at Attachment K.</p> <p>In terms of connectivity, this has been a central design principle in the siting of the proposed building (and</p>

Provision/Clause	Comply	Comment
		adjoining carpark), with appropriate massing, setbacks and uses.

**Table 10** – DCP Part 3 Summary Table Response

In terms of Part 5 of the DCP, the only section of relevance is Part 5.4 relating to Preservation of Trees or Vegetation.

The two objectives of that part of the DCP are met by the proposal, despite the proposed removal of 7 trees (which is offset by new native tree planting and landscaping).

A detailed Landscape Plan has been prepared and both the massing and siting of the proposal has appropriate regard to the landscaped setting of the site

## 5.9 Draft Environmental Planning Instruments

There are no known draft EPIs of direct relevance to the proposal.

## 5.10 Any Planning Agreement

No Planning Agreement is proposed.

## 5.11 Developer Contributions

A 1% development Levy (under Council's s94A Plan) would ordinarily apply to the proposal. This would be expected to be applied through a condition of consent, if approval was granted

Any discount, given the nature of uses provided, the wider benefits and the considerable contribution that will be needed as a license fee for use of the land, would be appreciated.

## 6 Environmental Considerations and Assessment

Section 4.15(1)(b) of the EPA Act 1979 requires an assessment of the impact of development on environmental impacts (natural and built), and social and economic impacts.

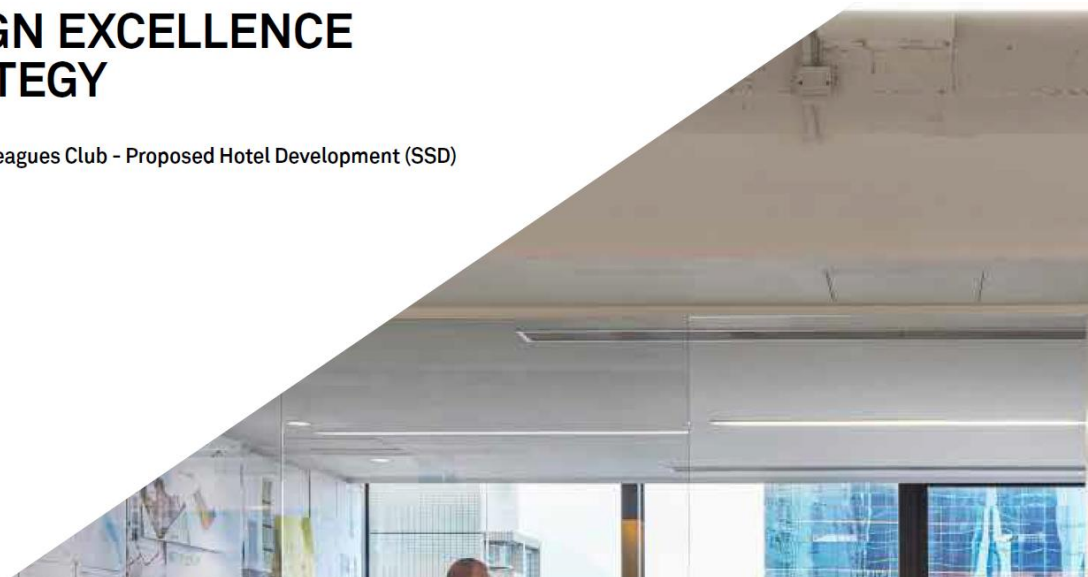
The following sections summarise key natural and built form anticipated environmental impacts from the proposal.

### 6.1 Built Form, Design Excellence and Visual Impacts

#### 6.1.1 Design Excellence

## DESIGN EXCELLENCE STRATEGY

Parramatta Leagues Club - Proposed Hotel Development (SSD)



**Figure 18** – Design Excellence Strategy extract (cover)

A Design Excellence Strategy was developed and agreed after consultation with the Office of Government Architect (OGA). That document is at Attachment E.

Subsequently, a Design Review Panel was established, consistent with the Design Excellence Strategy. That Panel consisted:

- Lee Hillam, OGA (Chair)
- Kim Crestani, Parramatta City Architect
- Tony Caro, Architect/Urban Designer (independent, although chosen by proponent)

The Panel meet on three (3) occasions between June – October 2018 and involved an intense and focussed review as the design and design detail evolved, with various members of the architectural and landscape team (and others) presenting to the Panel.

The minutes of the final meeting (dated 18 October 2018) are included at Attachment E.

The overall comments of the DRP, and a brief response, is provided in the table below:

Issue from Panel	Response:
The layout of rooms may be simplified, and is important to give effect to the design intent especially of the end walls;	The room layouts have been reviewed and simplified. The layouts should enable the effect of the end walls and light spill/outlook to be achieved.
The podium has increased in bulk and needed attention to detailing and refinement, while terraces may need weather protection. The element needed integration with the building;	The podium and Level 4 function room has been revised in detail and weather protection provided. The scale and proportional relationship is considered appropriate by the architects.
Planting on the roof terrace should not compromise functionality or the large spans needed below by undue weight;	Planting has been rationalised to still augment the park setting, yet disperse loads to the perimeter to not compromise the functionality of the function room below.
Connecting bridge to Club supported and may provide an opportunity for artwork, lighting, installation, celebratory signage etc.;	Noted and agreed. This could be developed as part of a public domain plan if approved.
Ground level and loading location generally supported. The café/kitchen/pool area could be revised to provide more space to the foyer;	Noted and layout amended to improve the lobby area and rationalise space.
Façade supported. Anchoring end walls was supported although attention needed to ensure not “too solid”;	Noted and agreed.
Panel supports southern vehicular access on the adjoining Stadium site – resolution of this issue between the parties is very important;	Noted and agreed.
Support retention of the Lemon Scented Gum and movement of the building to provide space;	Noted.
Wider permeability and pedestrian amenity may be compromised by the Stage 1 DA approval and efforts to break this massing would assist;	Noted, although beyond the scope of this DA. A matter for VNSW and DPE at the stage 2 DA for that building and adjoining site.
Proposed height and skyline supported and commended;	Noted.
Pool, gym and rooftop bar are positive elements;	Noted and agreed.
Proposal developing well and can proceed to DA – may be reviewed by this or State Panel subsequently;	Noted.
Previous and all concerns raised by Panel have been adequately addressed (no further meetings necessary);	Noted



Function room can be resolved by the architects.	This has occurred.
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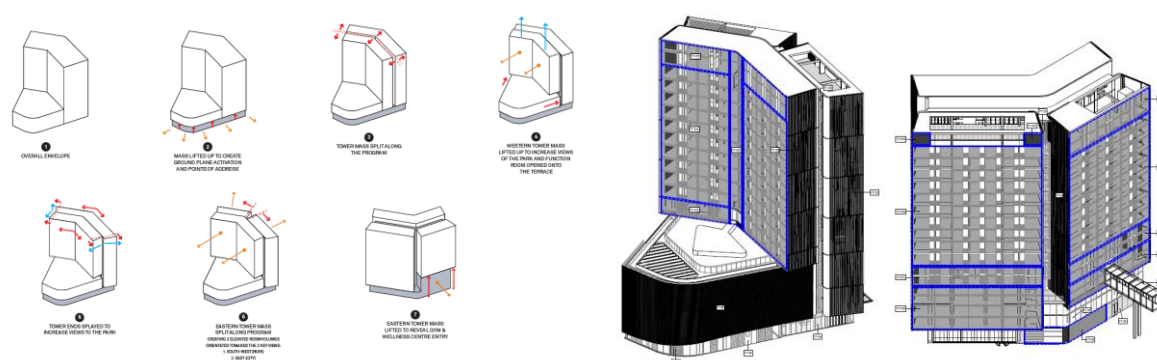
**Table 11** – Design Review Panel Comments Summary and Response

It is open for the Department of Planning and Environment to refer to lodged DA to the DRP for a post-lodgement review. No concern would be raised with this from the proponent's viewpoint as the process was constructive.

### 6.1.2 Built Form

The built form has evolved and been refined since the SEARs request, and, as outlined above, with collaborative input from the Design Review Panel.

The design philosophy and approach is well outlined and articulated in the Design Report prepared by Hassell, with extracts below.



**Figure 19** – Building Massing Evolution (Hassell, Design Report)

The approach to the built form has balanced and responded to the context of the site and surrounds, while providing a building of intrinsic quality, in seeking to achieve design excellence.

### 6.1.3 Materials

The materials are depicted in the Design Report and a materials board lodged with the DA (which would be on display with the public exhibition).

The materials involve a combination of glass, steel, metal, polished concrete, pre-cast panels, timber and the like. These are configured and assembled to augment and highlight the vertical and horizontal elements and proportions of the building.

The public domain includes a range of materials and planting, including high quality paving to accentuate the pedestrian primacy of spaces.



**Figure 20** – Materiality and Details (Hassell)



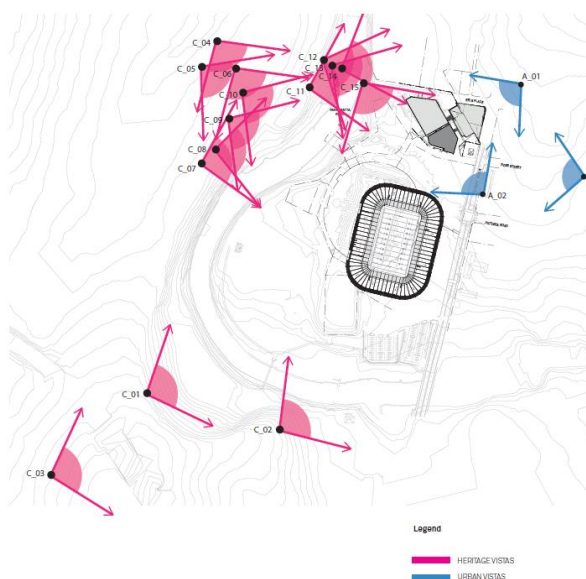
### 6.1.3 Visual Impacts

As required by the SEARs, a detailed Visual Impact Analysis was undertaken, encompassing both Heritage and urban considerations. The heritage considerations, including visual impacts, are addressed in Section 6.9 below.

A range of urban views and montages were undertaken from the surrounding area, as depicted in the Design Report.

The visual impacts are moderated and mitigated by the setback to O'Connell Street, the adjoining buildings, landscaping and the surrounding built context.

The following extracts depict the building form or building detail from different vantage points:



**Figure 21** – Vistas and visual images (Hassell)

The overall visual impacts, massing and height is acceptable from the surrounding area, both in terms of its heritage/park setting and urban settling.

## 6.2 Overshadowing

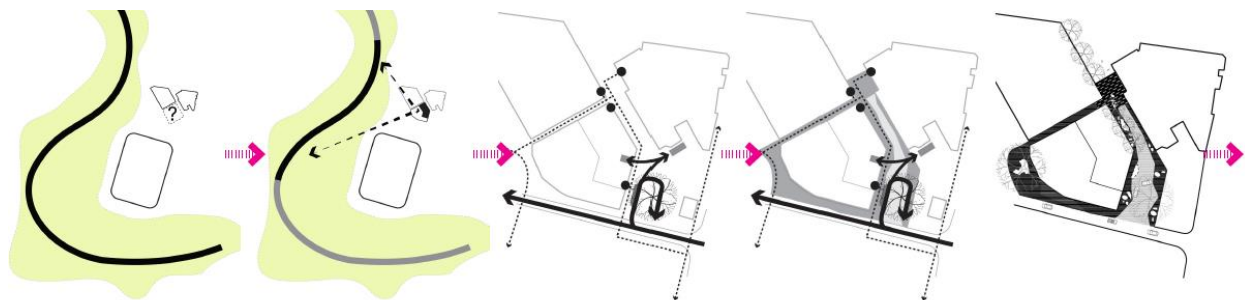
The site benefits from not immediately adjoining any privately owned or sensitive uses (like residential). The nearest residential uses are across O'Connell Street to the east and north-east, such that any overshadowing impacts are either non-existent or very minimal and limited to late afternoon in midwinter.

The shadows from the building will only cast a minimal shadow on the playing field of the Stadium playing field to the south of the development between 9am and 10am in midwinter. It is noted this is not a peak or key time for the use of the field for either sporting games or events.

Shadow diagrams have been provided with the architectural plans for the winter solstice and autumn/spring equinox, at hourly intervals between 9am and 3pm and showing the current and proposed situation. These show there will be no significant overshadowing impacts arising from the proposal.

## 6.3 Public Domain, Crime Prevention and Landscaping

### 6.3.1 Public Domain



**Figure 22** – Public Domain Conceptualisation (Hassell)

The conceptualisation of the public domain originates from the river and parkland setting and stitching the area together. This is outlined in the Design Report and Landscape Plans, and apparent when viewing the proposal.

The entry nodes to the north-west and north-east, together with the pedestrian desire lines in an east-west direction to the park, to the south of the building, allow the building to be activated at all sides by clever design. The pool area adjoining the new laneway to the east of the carpark and west of the hotel also allows views into the building to activity, light and people, further enhancing engagement between the public domain and the building.





**Figure 23** – Public Domain zones (Hassell)

The public domain is also layered vertically, to give expression and depth to the parkland setting, with landscaped elements to the podium roof and the roof terrace, which also enhances the amenity for the building users as well as providing a building in a park transition area.

The public domain and linkages with the surrounding area is well considered, and a positive aspect of the proposal.

### 6.3.2 Landscaping

Landscaping is integrated with the building and public domain, to reinforce lines of pedestrian movement and for pedestrian comfort. More native trees (at 200l size) are being provided than being removed, at a ratio of approximately 1.5:1. These are appropriately located for the reshaped and reconfigured public domain. Further planting will be incorporated to meet the recommendations of the Wind Report.

Hassell have also been in close consultation with Lend Lease and VNSW regarding the adjoining access road, to ensure the levels and details align for a smooth transition to that site.

#### Precedents



Hotel Drop Off



Stone seating elements to control traffic and provide rest



Shared surface laneway



Island seat and planter to southwest edge



**Figure 24** – Landscape Plan extract (Hassell)

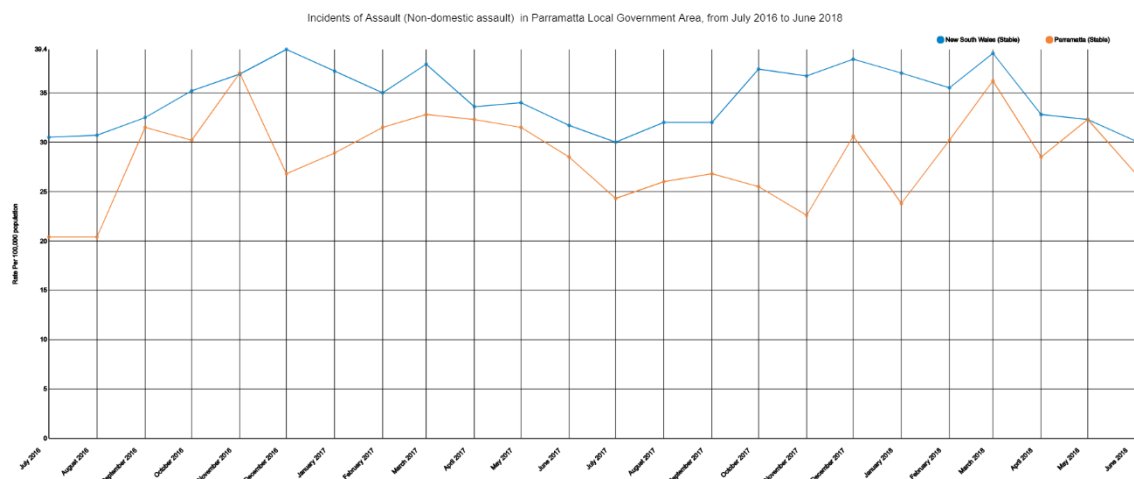
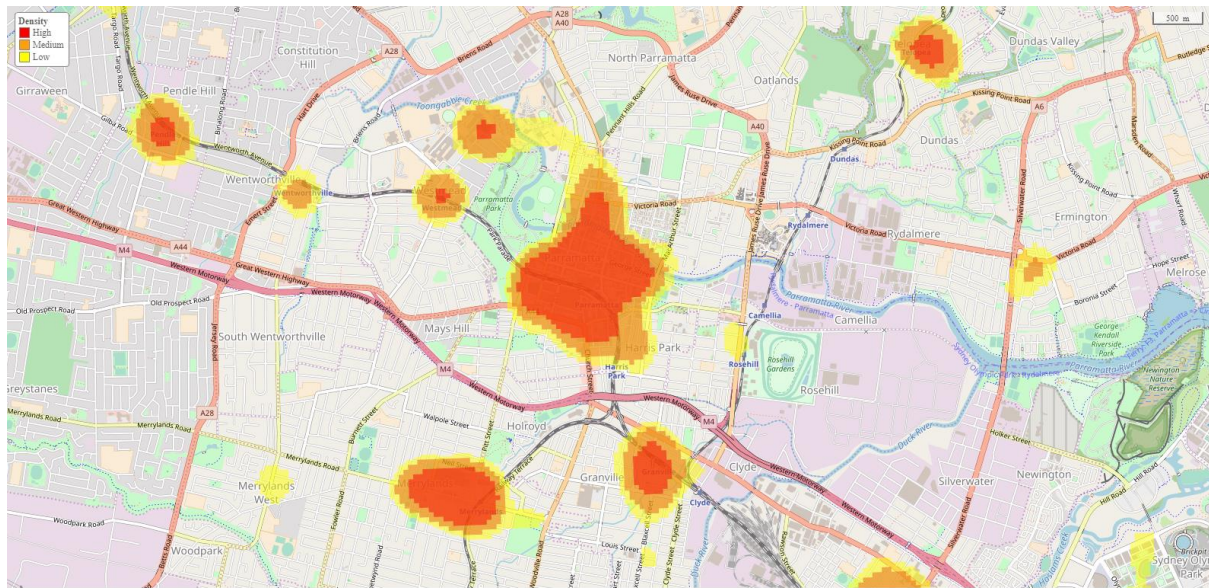
The paving and treatment at ground also gives visual cues to the pedestrian nature of the area. This includes the southern access road, where the traffic manoeuvrability has been accommodated within a treatment that breaks down the access road width, and provides an overall integrated public domain aesthetic.

The details of the proposed landscaping is contained at Attachment B.

### 6.3.3 Crime Prevention

A Crime Prevention Through Environmental Design (CPTED) is included at Attachment F.

The principles of surveillance, access control, territorial reinforcement and space management have been embraced by the proposal since its inception, recognising the importance the building has in a pedestrian precinct.



Source: NSW Bureau of Crime Statistics and Research

**Figure 25 – Crime Statistics (Australian Bureau of Statistics)**

The Crime statistics for the wider area and around the site show:

- The Parramatta LGA is a medium crime risk LGA;
- The average number of assaults in the past two years for Parramatta is less than the NSW average;
- There is medium-high area of assaults around Parramatta Stadium (and former pool), south of the site, likely to be linked to larger crowds on game days, coming to and from public transport;
- Methods which promote principles of CPTED around the Stadium should be encouraged.

The proposal, from its conceptualisation to realisation has appropriately considered and addressed CPTED principles. A number of recommendations (5) are made in the CPTED report to address game day management, CCTV cameras, lighting, a wayfinding strategy and activation to the northern undercroft area on game days. These are readily able to be incorporated as conditions of consent.



## 6.4 Tree Removal

There are 7 trees proposed to be removed, six within the site of the hotel owned by PPT, and the other to facilitate some widening of the access entry to O'Connell Street on the adjoining VNSW site.

A large Lemon Scented Gum is being retained and will be a feature.

The 7 trees to be removed include 3 x Narrow Leaf Peppermint trees, 1 x Flooded Gum, 2 x Spotted Gums and 1 exotic London Plane tree, varying from 8m-21m high.

Further information about these trees can be found in the Arboricultural report at Attachment I.

The proposed Landscaped Plan includes new tree planting to a total of 11 mature native trees, including replacement gum trees (Scribbly and Spotted), more appropriately positioned to enhance the public domain. This excludes additional planting recommended in the wind assessment report, which can be accommodated.



**Figure 26** – Proposed Tree Removal and Retention Plan extract (Hassell)

The trees to be removed are poorly placed on a boundary, within a bitumen carpark and amongst no understorey. Replacement trees will be greater in number, native to provide future habitat and more appropriately located.



## 6.5 Ecological and Biodiversity Impacts

The proposal, including impacts on native flora and fauna have been addressed in the comprehensive Biodiversity Development Assessment Report (BDAR).

A summary of key considerations and conclusions within that assessment follows.

### 6.5.1 Flora

As previously mentioned, Six (6) native trees are proposed to be removed (and one exotic London Plane tree). This is more than offset by 11 proposed mature native trees. The large and significant Lemon Scented Gum will also be retained.

The 3 Narrow Leafed Peppermint trees are proposed to be removed as part of the group of trees on the southern boundary. These are listed as vulnerable in the EPBC Act, although are not endemic to the area and their localised occurrence reduces their significance.



**Figure 27** – Vegetation cover on the site (Cumberland Ecology)

The vegetation on the site is a combination of native and exotic species, as illustrated above. Most of the trees are to the south of the site and have been approved for removal as part of the Stadium DA development and access.

Plant community types (PCTs) were plotted and assessed in accordance with OEI guidelines, adapted for the local circumstances, by Cumberland Ecology. The removal was found to

generate a required credit of one for PCT 835 (Forest Red Gum) using BDAR methodology. There was some potential ambiguity regarding the treatment of the Narrow Leafed Peppermint trees, which should be clarified with ongoing consultation with OEH (a response to the approach in the BDAR was not received prior to finalising the BDAR report).

The trees were assessed for potential habitat of native fauna, although this was found not to be problematic. The trees are not naturally occurring, none contained hollows and the understorey is cleared, with trees being located amongst bitumen.

#### **6.5.2 Grey Headed Flying Fox Colony**

The only remaining potential ecological impact was a potential indirect impact on a Grey Headed Flying Fox (GHFF) Colony approximately 110m west of the site.

The trees to be removed were not found to be likely important habitat or foraging trees, and it was noted the retention of the large gum tree and new planting provided potential future foraging.

The indirect impacts on the GHFF colony were found to be minor and acceptable. There would be a minor impact on flight paths by the GHFF colony, which would adapt. Indirect impacts such as dust and noise were considered, especially during temporary construction. Lighting was found to be less potentially problematic due to the bats foraging at night.

A number of recommendations were made regarding measures during construction to minimise and mitigate temporary impacts, which are able to be included as conditions of consent. These included matters such as:

- Tree provision and protection;
- Dust management;
- Noise management;
- Light spill management;
- Placement of large plant, pump silences and the like.

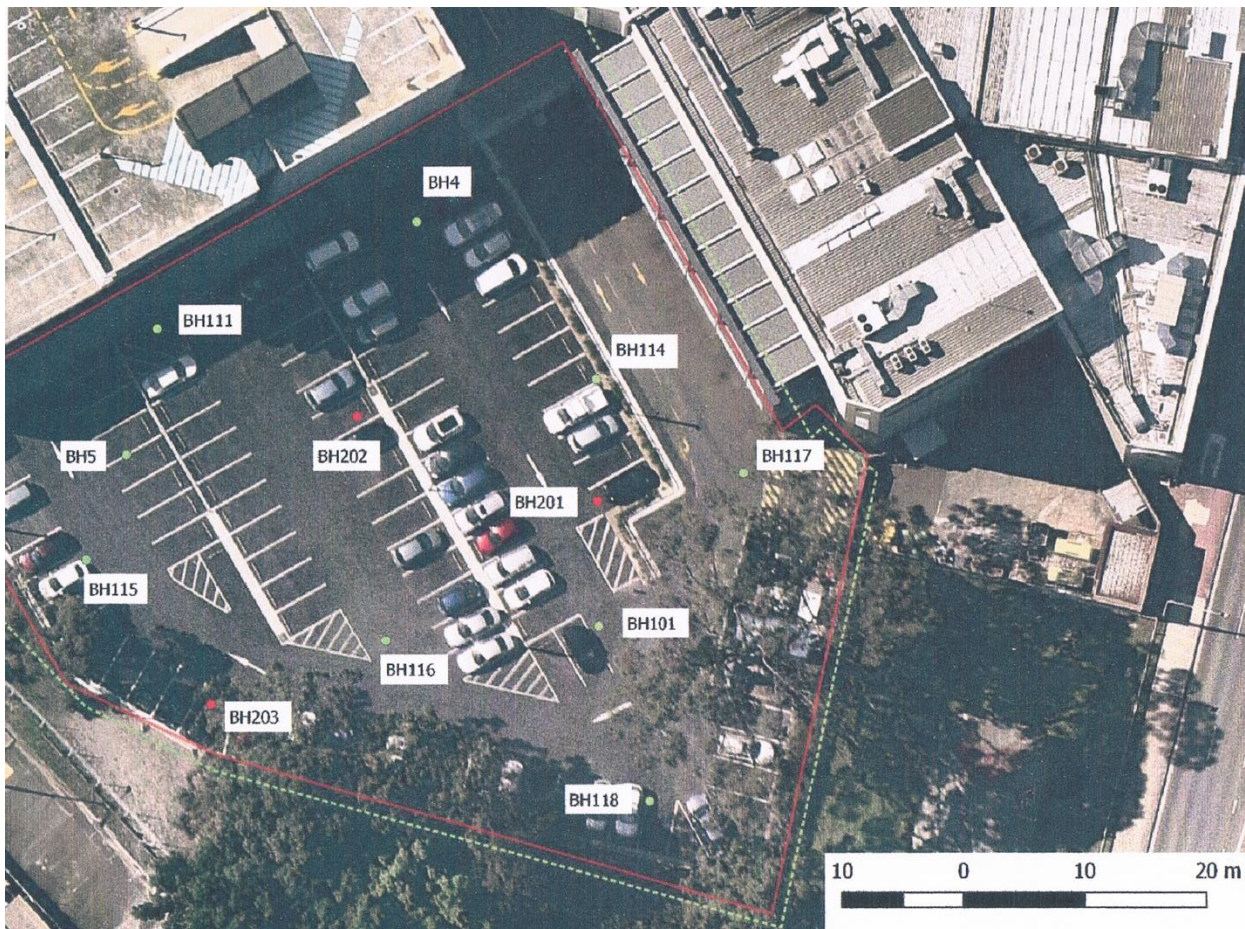
The BDAR report summarises impacts to be minor and indirect, and the main impacts is to a GHFF colony, which is also minor and mostly temporary during construction, which can be reasonably mitigated by recommended measures.

## **6.6 Contamination**

The proposal is supported by both a Detailed Site Investigation (DSI) and Remediation Action Plan (RAP), by Douglas Partners (Attachment L). This follows well understood and adopted procedures under SEPP 55 (Remediation of Land) and associated Guidelines.

The RAP was necessary due to trace elements of asbestos, which was not widespread and metal trace elements. In terms of contaminants within the ground, this was assessed through a number of bore holes and soil samples, undertaken both with the original carpark DA and augmented with more recent testing, shown below.





**Figure 28** - Bore hole test sites (Douglas Partners)

The soil was classified either as Virgin Excavated Natural Material (VENM), General Solid Waste (non-putrescible) or Special Waste (containing some asbestos).

The presence of asbestos and some metal trace elements warranted a RAP, which has been undertaken.

The RAP provides a mechanism to ensure the site is able to be made suitable for the proposed use, satisfying a key consideration under SEPP 55. This can be ensured and implemented through appropriate conditions of consent.

## 6.7 Soil and Geotechnical Issues

The soil and geotechnical issues have been addressed in the Geotechnical Investigation by Douglas Partners, at Attachment M. Some key aspects and findings are summarised below.

### 6.7.1 Soil

The site is near the boundary between the Hawkesbury Sandstone formation and Ashfield Shale foundation. The soil profile from boreholes indicate:

- Asphalt concrete to 150mm below surface;
- Silt, gravel and sand to 600mm deep;

- Natural soil, clay and traces of gravel and weathered rock to a depth of 5-6m;
- Medium to high strength sandstone generally around 5.5m below the surface.

As the proposal only involves excavation in the order of 3.5m below surface for part of the site, this is expected to be able to be undertaken by conventional excavators and front end loaders, without the need for rock saws or the like, but possible localised rock hammers (source: Douglas Partners). Overall, the conditions compared to more rocky sites will reduce likely dust, vibration and noise.

The soil was tested and found not to be aggressive and of medium to high strength.

The soil is able to support the proposed development, with further testing and inspection by a geotechnical engineer.

### **6.7.2 Acid Sulphate Soils**

The site has an ASS classification of 5 in Council's LEP map, as outlined in Part 5.7 of this Statement.

The results of the ASS investigation are contained in the Detailed Site Investigation, and Remediation approach and management outlined in the Remediation Action Plan (at Attachment L).

The soil had relatively high acidity, which Douglas Partners concluded not to be acid sulphate soils but general acidity, from the chemical profile from detailed testing. A Management Plan was recommended in the DSI (involving on site management, essentially involving application of lime and testing prior to disposal), which is included in the RAP and is able to be addressed as a condition of consent.

### **6.7.3 Water Table**

Previous and recent borehole testing and review shows the groundwater is below the level of the basement. The lowest level of the basement is RL 10.

The recorded groundwater level is such that an aquifer interference licence from NSW Water would not be necessary.

Water management during excavation is manageable and the relatively minor excavation is such that it should be complete within approximately 1 month.

Douglas Partners have advised:

*The basement excavation (FFL 10.0 m AHD) is generally located above the recorded groundwater levels in two separate investigations (Maximum level recorded at RL 8.4 m AHD). Accordingly, groundwater is not expected to be intersected by the basement excavations. Notwithstanding, these historical readings there may be some localised seepage of groundwater into the excavation, particularly following prolonged periods of wet weather. It is therefore considered sound engineering practice to allow for some minor seepage to flow into the basement during extreme weather events as a contingency plan. Such seepage will need to be collected during construction by the*



*judicious placement of drainage sumps and by intermittent pumping. At this stage, it is not possible to estimate the likely extent and rate of seepage although it is anticipated*

*Based on current groundwater recordings and previous measurements the development is not expected to interfere with the aquifer or require licensing in accordance with the definitions of aquifer interference or licensing as defined by the NSW DPI Aquifer Interference Policy 2012.*

## **6.8 Aboriginal and Archaeological Issues**

The Aboriginal and European archaeological considerations and assessment of impact is detailed in the report by Austral Archaeology at Attachment H. An overview is provided below.

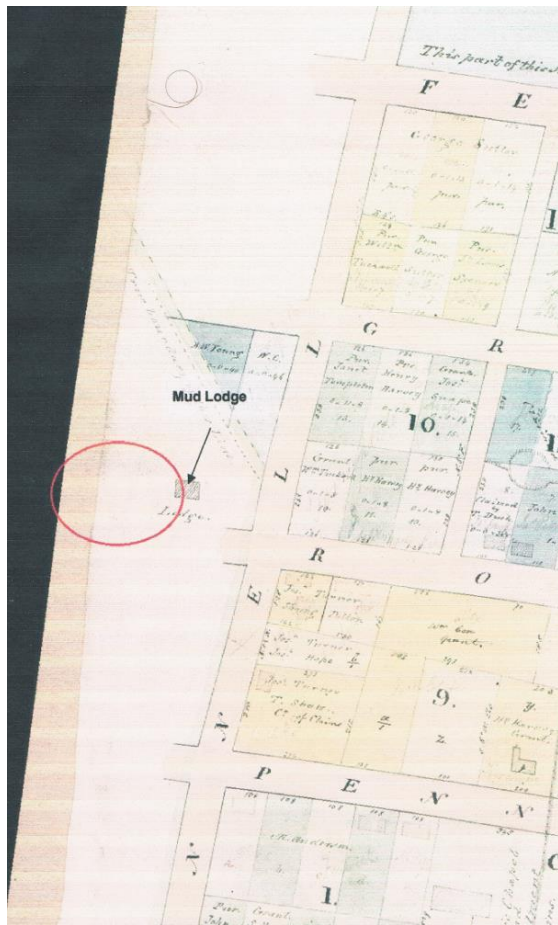
### **6.8.1 Indigenous Considerations**

The original inhabitants of the area were the Aboriginal people of the Burramattugal of Bormomedegal clans, dating back 30,000-40,000 years. They formed part of the larger group of Darug people.

Previous detailed archaeological study of the subject and adjoining site was undertaken with the adjoining recent carpark development. Based on the known 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, based on empirical data. Due to this, consultation with aboriginal people was not required. However, recommendations are made in the archaeological report about archaeological supervision and protocols and requirements regarding any unexpected finds.

### **6.8.2 European Archaeology**

The former Gatehouse (location of the current cottage) is to the east of the site. However, there is reference to a "back lodge" in 1822-1823, which was made of mud. Mapping is understandable poor, but it is possible remnants of this "Mud lodge" (as it was known) may be beneath the carpark, most likely at the eastern end towards the cottage. This may be a small possibility, as the mud lodge was replaced with a stone lodge (in the location of the current cottage), although it is possible it was not exactly in the same position. An extract of an 1840 map is below, which indicates there is possibility the former mud lodge may be at the eastern end of the site



**Figure 29** - 1840 map of area source: Austral Archaeology)

The archaeological assessment recommends specific methodology for pre-excitation, supervised by an archaeologist, including an "L" shaped investigative trench at the eastern end of the site. This could be included and required as a condition of consent.

Other recommendations (a total of 5) to appropriately mitigate any potential archaeological impact are also made in the archaeological report.

## 6.9 Heritage Impacts

### 6.9.1 Old Government House Domain

A detailed heritage Visual Impact Assessment was undertaken, using the technical approach required within the SEARs (and verified in the attached Heritage and Visual Impact Assessment) by Purcell, at Attachment G.

There were several layers to this analysis. Firstly, there is a specific control for any building on this site (and surrounding highly sensitive area adjoining the OGH) to have 80% of its height below the tree line of the Park. This is included in Parramatta DCP 2011 and referenced in the 61 page Conservation Agreement (CA) between the Federal DoEE and Parramatta City Council, illustrated below.



Map reference	View
1	From lawns east and south of OGH towards the city
2	From NE corner of OGH to Old Kings School
3	From Bath House area west of OGH to city
4	Parramatta River views towards city from road within Parramatta Park on west side of river
5	From Dairy Precinct within Parramatta Park looking north east and south east towards city
6	West along George Street towards Gatehouse of OGH

**Figure 30 - Key Vistas PDCP 2011 and Conservation Agreement**

Vistas 2 and 5 are the relevant vistas in this map (others are oriented away from the site). These equate to views 3 and 10 in the 2012 Planisphere Technical Guide, being the technical guide accompanying the Federal and International listing. Specifically, the DCP and Conservation Agreement contain the following control:



### Area A.1– 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.

The two key vistas have been accurately modelled by Purcell, and the building is at or below the tree line, as shown below:



**Figure 31** - Vista 2 in PDCP 2011



**Figure 32** - Vista 5 in PDCP 2011

The proposal is essentially at or within the tree line and does not contravene the “80%” control. This methodology and conclusion by Purcell has been agreed by DoEE.



The 2012 Planisphere technical document guiding assessment of impact on OGH (and cited in the DCP provisions and CA description of the “Park Edge Precinct”) also lists 16 vistas and ranks their importance (with a different numbering system to the DCP, which is confusing). This is the numbering used in the Heritage and Visual Impact Assessment. The Purcell report outlines an assessment of the vistas as relevant to the proposal (i.e. where they are directed to the site).

The Heritage and Visual Impact Assessment also addresses impacts from the Parramatta North Historic Sites area, including consideration of the vistas within the Conservation Management Plan by TDK Architects 2017. This included additional visual modelling following feedback from NSW OEH (letter 13 November 2018), both from Vista 6 in the Planisphere technical guide and within the Parramatta North/Norma Parker Centre.

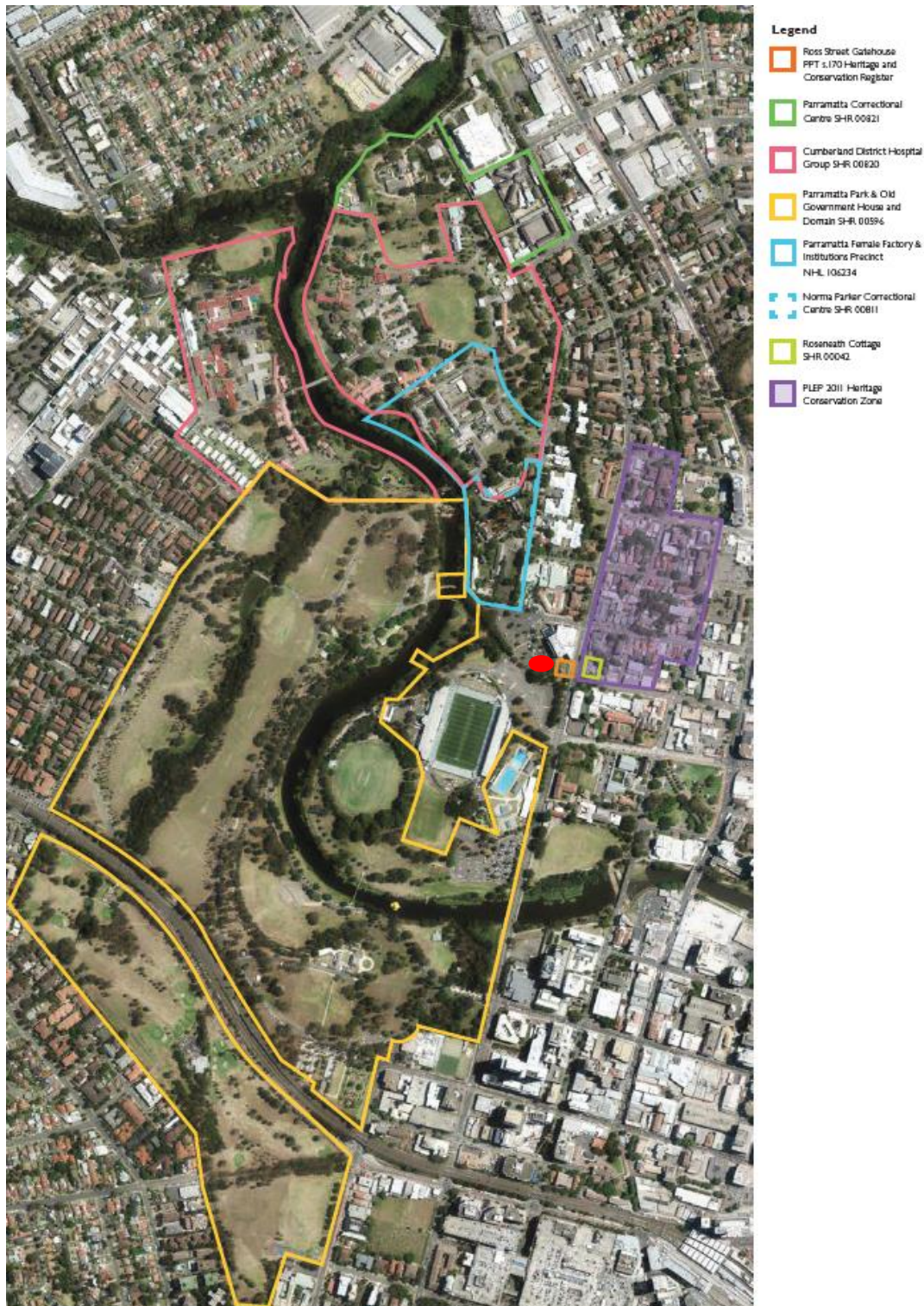


**Figure 33** - Vista 6 in Planisphere document

The report by Purcell concludes: the proposal “does not present a significant impact” to the OGH and surrounding heritage assets. As can be seen, in vistas where it is visible, it is also within the context of the CBD skyline and other buildings being visible.

### 6.9.2 Other Items and Conservation Area

There are other items in the vicinity of the site, including the former Gatehouse (s170 Register), other local items to the east on O’Connell Street and a Heritage Conservation Area to the east. The various listings are well summarised in the following illustration by Purcell:



**Figure 34** – Heritage listing and hierarchy composite map (Purcell) – site red dot

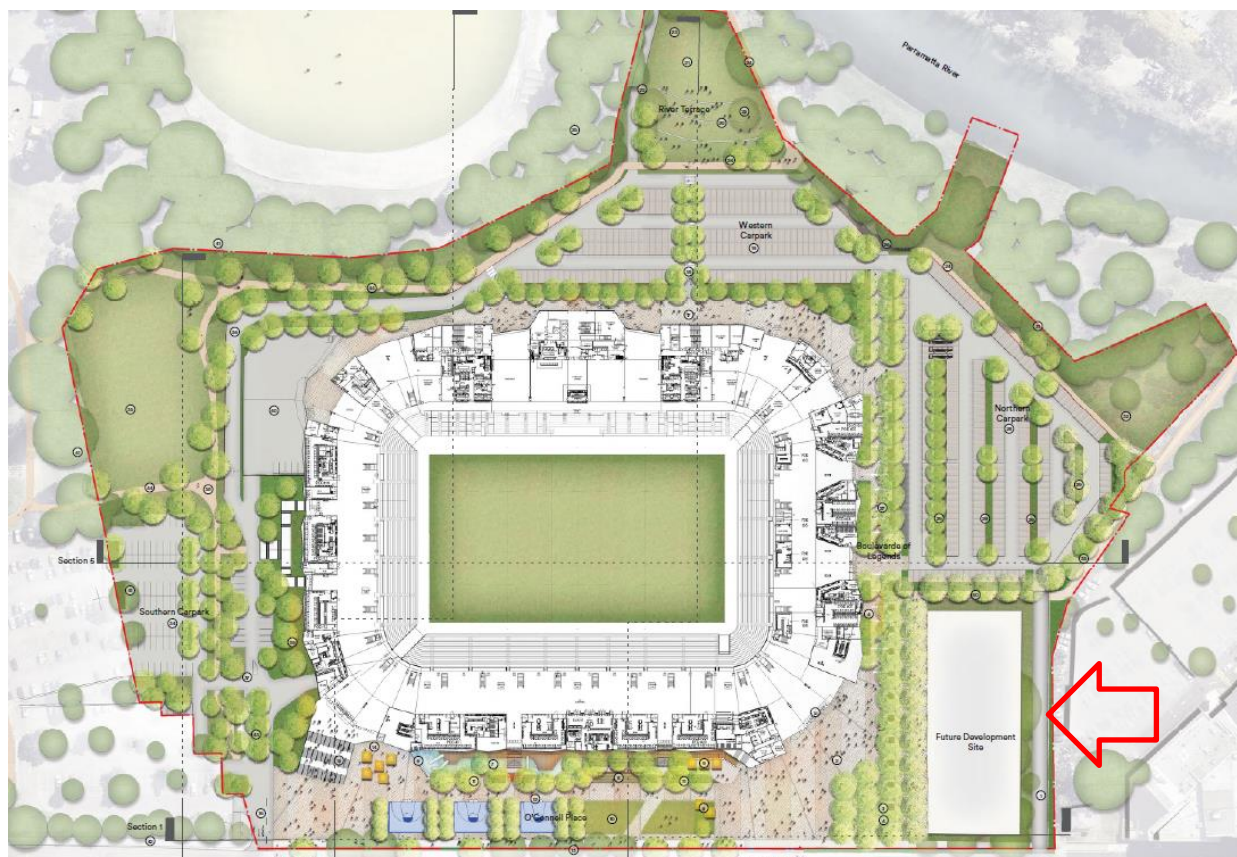
The report by Purcell concludes: “on balance, the assessment concludes that the proposed hotel development does not present a significant impact to the values of the adjacent significant items..”



## 6.10 Transport, Traffic and Parking

### 6.10.1 Transport and Access

As previously mentioned, in terms of vehicular access, the adjoining accessway within the VNSW Stadium site has been approved as vehicular and pedestrian access (northern loop road), as part of the approved Parramatta Stadium Development, shown below:



**Figure 35** – Stadium DA approval (SSD 8175), source DPE website, Aspect Studios

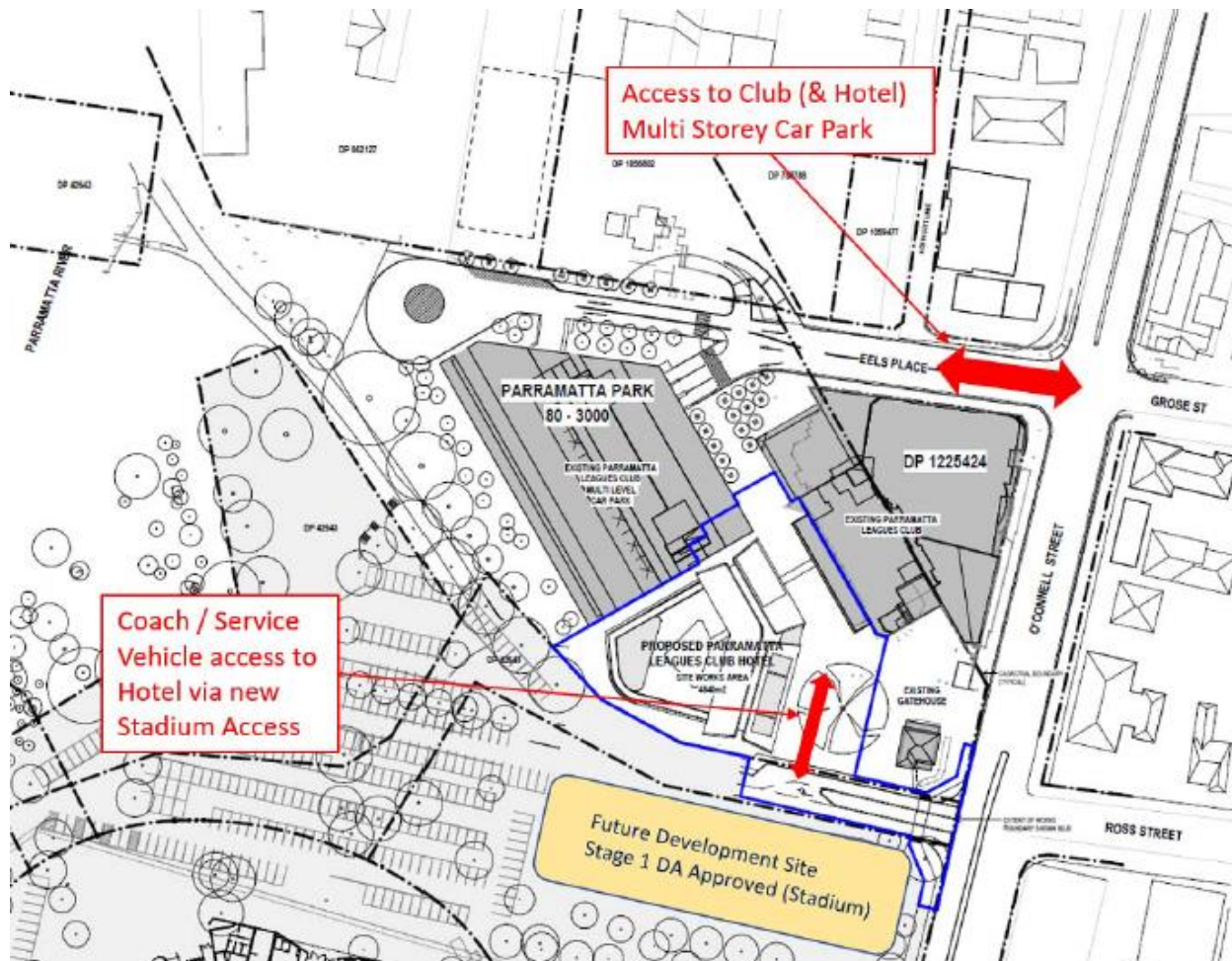
The “Stage 1” development approval for the Stadium that preceded the Stage 2 DA included an indicative building envelope for a 20,000sqm building (indicated above, left of the access road and red arrow).

The proponent for the subject hotel (and traffic expert) maintains this widened access road solution will be in the long term benefit of Venues NSW and the State, as it will allow rational access for the future Stage 1 building (given it would not be rational and orderly to access directly from the RMS classified O’Connell Street, while to the south is the main entrance to the Stadium). The solution suggested and depicted on the proposed plans would also improve access to and within the Stadium site generally, while still maintaining a left-in, left-out to O’Connell Street. The proposal also allows access to the proposed hotel, with an improved overall public domain outcome compared to any alternative, which may be possible, but not preferred.

Formal owners consent has not been secured from Venues NSW for lodgement of the DA, although from negotiation between the parties, there is confidence such approval will be

obtained. This would also then entail agreement for formal rights of access. Such understanding does not bind the parties and it is understood the onus for obtaining owner's consent prior to determination lies with the applicant of the proposed hotel.

The access arrangements for the Hotel, club and carpark are summarised in the Figure below:



**Figure 36** – Proposed vehicular access (TTPP)

Turning circle analysis has been undertaken to confirm the access is able to meet Australian Standards.

In terms of other transport options, these are outlined in the attached Traffic and Accessibility Impact Assessment by TTPP (Attachment K), and includes buses, shuttle bus, bicycles and pending light rail (along Church Street, two streets to the east). Parramatta Train Station is approximately 1km south of the site, equating to around a 15 minute walk.

The potential future Metro-West station between Parramatta and the Sydney CBD would also augment public transport opportunities. The site is relatively well serviced by non-car based travel options.



### 6.10.2 Traffic

While it should not be over-estimated, there is some potential for the hotel to reduce traffic during the busiest days at the Stadium, as the hotel provides a new opportunity to stay next to the Stadium and walk to the event, instead of travelling by car or other means.

The traffic impacts are also reasonably reduced by the provision of no additional parking, noting that in busier areas, traffic impacts can be driven by supply of parking availability, as opposed to theoretical demand. Instead, parking is provided in the adjoining carpark to the west of the site.

The traffic analysis by TTPP addressed impacts during events at the adjoining Western Sydney Stadium. In terms of event days at the Stadium, the report by TTPP found: *"During the worst-case scenario (i.e. major event mode), the proposed hotel development is expected to have no net impact on the surrounding road network compared to the Stadium operation"*.

The TTPP analysis undertook a conventional approach of intersection modelling, assumptions regarding travel directions/occupancy, arrival/departure peak times and projections for surrounding growth. The traffic analysis considered the traffic situation now, accounted for growth, at a reasonably conservative 2% growth per annum, to account for overall cumulative impacts.

During non-game days, the projected traffic analysis found existing intersections operate reasonable well (in terms of conventional "Levels of Service"). In terms of projected impacts, conventional SIDRA modelling was used. This found that intersections would operate satisfactorily, with the exception of Victoria Road/O'Connell Street. However, this is due to increases in background traffic/growth in the wider network over a period of approximately 10 years, as opposed to the hotel development. TTPP are of the opinion this could be addressed and managed by RMS through phasing and traffic management measures.

The Traffic assessment by TTPP also makes some recommendations, including a Green Travel Plan to enhance potential use of non-car based travel.

### 6.10.3 Construction Traffic

Overall construction traffic is reasonably reduced by limiting the footprint and depth of the excavation, which also minimises other excavation-related amenity impacts (while demolition is also limited). 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. TTPP have estimated daily truck movements, shown in the following table:

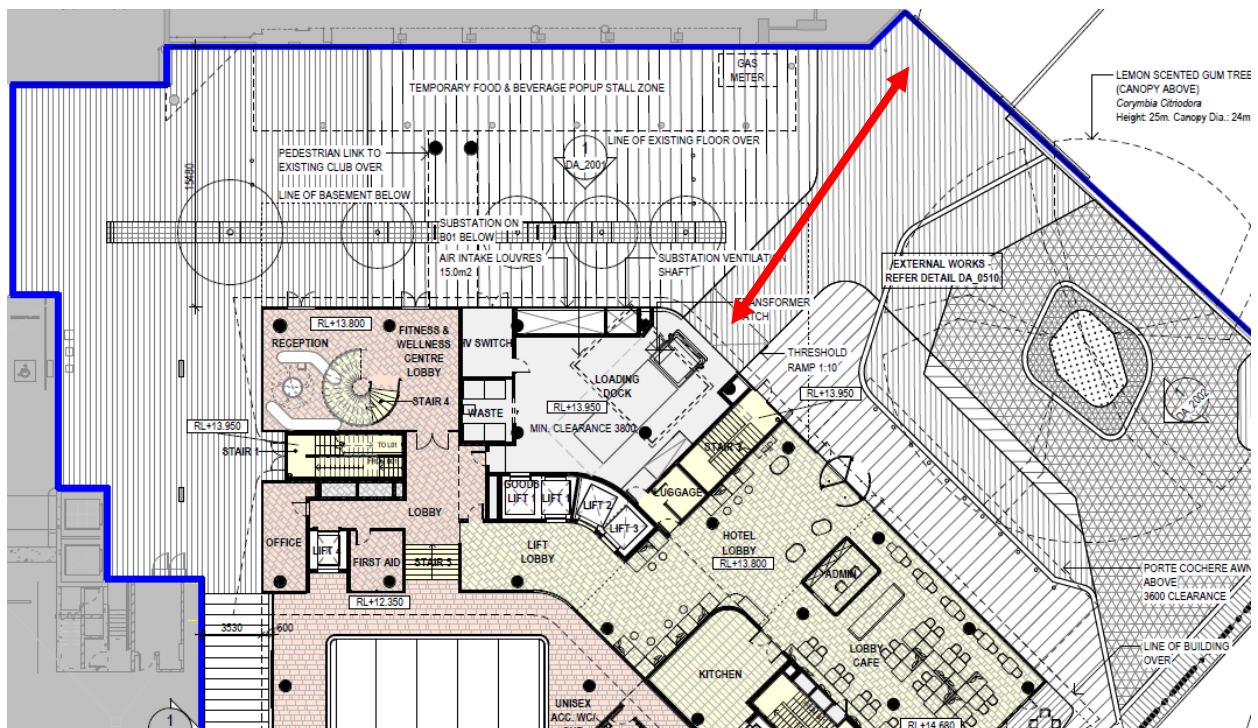
Stage	Approximate Duration (months)	Average Daily Truck Movement Vehicles / day
Demolition	1	5
Excavation	4 - 6	10-20
Building Works	14- 18	40 during concrete pours 10-20 during non pour periods

**Table 12** - Construction Traffic estimates (TTPP)

A draft Construction Traffic Management Plan has been prepared by TTPP (as required by the SEARs). This established principles and a clear framework to develop a Construction Traffic Management Plan, which would be an expected condition of development approval.

#### 6.10.4 Loading

The loading area is to the north-east of the ground floor, in the best location to give primacy to pedestrian movements, yet located to ensure vehicles are able to access and enter/exit in a forward direction. It is also diagonally opposite the existing Club loading area, which is rational and also facilitates truck manoeuvrability (shown in the red arrow below and swept path analysis in the Traffic and Waste Management reports).



**Table 37 - Loading area Locations (Hassell)**

#### 6.10.5 Parking

As previously mentioned, no additional parking supply is provided. This approach was supported in consultation with Parramatta City Council, in part due to the history. That is, the approval for the 773 spaces in the adjoining carpark sought to anticipate the potential parking demand from the subject site, in the knowledge it was to be developed. At the time, Parramatta Council staff were concerned about the potential oversupply of parking relative to the Club use. However, the approval and development assessment of the carpark did recognise that:

- There would be likely development of the subject site;
- There can be peak demands at special events at the Club, and during the adjoining Stadium.

The accommodation of parking within the adjoining carpark is also sensible and rational, as the likely peak demand for the Club users (nights, weekends), does not correspond with peak

demand times of a hotel and associated fitness and leisure uses. This means there is counter-cyclical demand, that avoids coinciding peak demands. This is recognised and supported in the Traffic and Parking assessment by TTPP.

The parking aspects of the proposal are addressed in the report by TTPP at Attachment K.

The parking demand analysis approach undertook a traditional and conservative approach of estimating parking “demand” based on various uses on the building, and using rates within Parramatta DCP 2011 and published RMS rates (Guide to Traffic Generating Development).

This is summarised in the table below:

Use	DCP Parking Requirement for Stand Alone Development	Total Parking Supply of Multi-Storey Car Park	Nett Car Park Capacity / Demand
Existing Parramatta Leagues Club Facilities (non-event mode)	274 spaces (based on previous survey)	-	-
Hotel	52 spaces (1 space / 4 rooms)	-	-
Wellness & Fitness Centre (Pool + Gym) for Proposed Hotel Development (3,688 m2)	166 spaces (4.5 spaces / 100m2)	-	-
Function & Meeting Room (2,128 m2)	319 spaces (15 spaces / 100m2)	-	-
<b>Total</b>	<b>811 spaces</b>	<b>733 spaces</b>	<b>-78 spaces</b>

**Table 13** - Parking Supply/"Demand" (TTPP)

As can be seen, there is more theoretical demand than supply, by around 10%. However, this is based on assuming that there is concurrent peak demand alignment (in terms of time) and that each use is separate and generates its own demand. Neither of these assumptions is appropriate. That is, peak demands for the component uses between the Club, hotel and fitness/leisure uses do not align, and the component uses are not independent. Rather, the hotel guests and club users will be users of the leisure and fitness uses, so would not generate independent parking demand. These key factors will ensure or enable the carpark to meet demand and leads to the understandable conclusion by TTPP:

*It is considered that the provision of 773 on site parking spaces will adequately accommodate the Club precinct's future parking demand in a manner which is consistent with the approval of the multi storey car park and the anticipated future Precinct development and broader transport policies which seek to reduce private vehicle travel in favour of public and active transport.*

### 6.11 Building Code of Australia (BCA) and Accessibility

The proposal is a new building. Therefore provisions and considerations under the EPA Regulation 2000 applicable to upgrades of existing buildings do not apply. Instead, the new building will be subject to the BCA and National Construction Code (NCC) provisions applicable at the time of construction and addressed in the thorough certification process.

The BCA considerations have been considered in a relatively detailed design evolution process in the preparation of the DA plans.

The BCA and accessibility considerations have been addressed in the BCA and DDA Compliance Statement at Attachment P, by BM+. This makes a number of recommendations relating to details with the CC and performance measures to be addressed by a Fire Engineered brief, which are known and able to be addressed through the certification process.

The BCA/DDA assessment finds;

*“Subject to the above measures [recommendations in the report] being appropriately addressed by the project design team, compliance with the provisions of the BCA is readily achievable. In addition, it is considered that such matters can adequately be addressed in the preparation of a Construction Certificate without giving rise to any inconsistencies with the Development Approval”.*

### 6.12 Acoustic and Vibration Assessment

The acoustic and vibration considerations of the proposal are addressed in the expert report by JHA contained at Attachment Q. A summary overview is provided below.

#### 6.12.1 Acoustic

There are two considerations: noise from the proposal to the surrounds and noise from the surrounds to the hotel.

In terms of noise from the hotel, it is not a typically noise-producing use. However, there are components (such as the function room, terrace and roof bar) and plant/equipment that have the potential to cause noise impacts. This has been considered in the attached report by JHA, which has assessed the proposal against existing applicable guidelines. Again, the proposal is aided by good separation to any surrounding sensitive receivers. Recommendations have been made during design development which have been incorporated into the plans (such as the height of glazing elements) to address and ameliorate any impacts.

The acoustic assessment finds that the proposed use of the premises is able to meet applicable accepted noise criteria to the surrounding area. It is also noted that the proposal would be subject to ongoing compliance with noise standards, both within any development consent and the provisions of the Liquor Act and associated licensing through NSW Liquor and Gaming. The latter includes provisions to enable action at any time regarding any breach, with ongoing consequences regarding licensing.



While it is not determinative, it is also noted that it is in the interests of the operator and owner for the building components not to cause adverse external acoustic impacts, as this would impact in the use and enjoyment of the hotel and the adjoining Club, which are the nearest uses.

In terms of noise impacts to the inside of the building, the use is not for permanent residential accommodation, although it is recognised hotel use and occupants expect a good night's sleep, especially in a 4-star equivalent hotel. The traffic volume of O'Connell Street does not trigger the acoustic considerations within *SEPP (Infrastructure) 2007*, as the daily volume is under 40,000 vehicles.

In terms of external acoustic impacts to the hotel, there are potential impacts from the adjoining carpark and events at Western Sydney Stadium. In this regard, the report by JHA notes:

*The external façade should be designed such that the internal noise levels of the proposed development are within the recommendations of the relevant Australian Standards and guidelines, with further consideration for sleep disturbances. Based on the expected noise impacts on the proposed development, an alternative means of ventilation is recommended such that fresh air can be provided within the guest rooms with the windows closed...in accordance with AS1668 2:2012...*

This can be addressed as a condition of consent and would occur in any event to ensure appropriate construction detailing and noise amelioration.

#### **6.12.2 Construction noise and Vibration**

Construction noise impacts have been considered and a number of criteria established, as outlined in the report by JHA at Attachment Q.

The Geotechnical report by Douglas Partners (Attachment M) finds that the ground to be excavated comprises soil and low strength rock, able to be excavated by traditional means (excavator), with possible localised rock breakers. This, together with a relatively small excavation footprint being limited to a part-level, is such that noise and vibration usually associated with rock sawing, jackhammering and piling can be essentially avoided.

Potential vibration impacts are addressed in the report by JHA and are able to be monitored, regulated and mitigated during excavation, noting previous comments about relatively limited comparable impacts in this regard.

A Construction Noise and Vibration Plan is recommended in the acoustic report, although this may not be necessary given specific noise controls that can be addressed by conditions of consent, and noting the limited excavation into soil, not rock.

### **6.13 Air Quality and Odour**

#### **6.13.1 Air Quality**

The proposed use(s) is not one which is expected to produce any ongoing polluting emissions. No pollution licence will be required.

Plant and equipment will meet Australian Standards. Food handling will meet the requirements of the Food Act 2003.

Waste will be separated and recycled and disposed of to meet Council requirements and by private registered contractors. The proposal is supported by a detailed Waste Management Plan.

As previously mentioned, the excavation is limited and not within rock, largely able to be removed by excavators/front end loaders (verified in the Geotechnical report by Douglas Partners). As a new building, and an existing carpark, demolition is limited and limited on-site sawing of concrete is anticipated. Dust and air quality measures are manageable and provided a framework by the draft Construction Management Plan (traffic), Noise Assessment Report and Environmental and Construction Management Plan (Attachment O).

The geotechnical report and DSI/Remediation Action Plan (by Douglas Partners) finds there is no putrescible or petro-chemical substances in the soil likely to produce odour.

No adverse air quality impacts are anticipated to arise from the proposal, with dust suppression measures during excavation able to be managed and regulated through a conditions of consent.

#### **6.13.2 Odour**

Similar to the above, the proposed use(s) is not one which is expected to produce any ongoing odour. No pollution licence will be required.

The main potential for odour is the pool. However, chemicals have a designated storage area and will be used to ensure appropriate levels of bacterial control, with regular testing and cleaning. The requirements of the Public Health Act 2010 (Division 3) will be met.

The geotechnical report and DSI/Remediation Action Plan finds there is no putrescible or petro-chemical substances in the soil likely to produce odour.

In terms of operational matters, a detailed Waste Management Plan and Plan of Management have been prepared (Attachments U and V).

No adverse odour impacts are anticipated to arise from the proposal, with ongoing operation guided by a Waste Management Plan and Plan of Management, and legislative requirements regarding public health, able to be regulated through a conditions of consent.

### **6.14 Wind and Reflectivity**

#### **6.14.1 Wind**

A detailed Pedestrian Wind Environment Study has been undertaken by Windtech (Attachment S). This included full wind modelling and an assessment consistent with the requirements of Parramatta DCP 2011. This included the adjoining existing buildings, including Stadium under construction. It did not include the Stage 1 DA for the building on the Stadium, site as there is not sufficient certainty regarding that building. In any event, this is to the south and likely to block

southerly winds at lower levels, yet will not affect wind effects from the proposed higher tower due to relative heights.



**Table 38** - Wind model extract (Windtech)

The wind assessment undertook assessment at a variety of points around the perimeter of the proposed building within the public domain. The report found: *"all areas pass the criteria for safety; however the ground floor areas near the northern corner (Point 2) and along the southern façade...are noted to experience winds that exceed the relevant criteria for comfort"*

To mitigate and ameliorate this impact, the report recommends a number of measures including retaining proposed trees and additional trees and shrubs along the north-eastern and southern aspect of the development. This has been discussed between Windtech and Hassell (the architects/landscape architects) and these extra trees are able to be accommodated to meet the recommendations. However, this can be addressed either at Response to Submissions stage or as a condition of consent, in case other changes arise during assessment that need a response or revision.

The requirement to avoid lightweight furniture and remove outdoor furniture at close of business of associated space is included in the Plan of Management.

#### **6.14.2 Reflectivity**

A detailed Solar Light Reflectivity Study has been undertaken by Windtech (Attachment T).

This report finds/recommends: *"to avoid any adverse glare to motorists and pedestrians on the surrounding streets, occupants of neighbouring buildings, and to comply with the abovementioned planning control requirements, the following is recommended.."*

Three (3) recommended measures are made, all regarding glazing properties. These can be included as a condition(s) of consent and are not problematic, as the design is not a curtain wall

whereby glazing is the key barrier to manage heat load. Rather, the use of masonry end walls, balconies and adjustable louvres within double-glazed elements allows good temperature control. It will also allow the use of clear or clear-equivalent glazing, which would not pose reflectivity issues, and to ensure the available views are capitalised upon.

### 6.15 Views

Views (or vistas) from public areas to the development are addressed in the Visual Impact Assessment within both the Statement of Heritage and Visual Impact Analysis by Purcell (Attachment G) and the Design Report by Hassell (Attachment D).

In terms of private view impacts (or impacts upon the views from within other private development), there are no anticipated impacts of any significance. This is because the building is surrounded by the Club building to the north, the carpark building to the west, the Stadium building to the south, and the former one storey Gatehouse and O'Connell Street to the east. There are no existing view lines over the current site (up to the height of the adjoining carpark and Club) from the surrounding area, and where any exist they would be blocked by surrounding buildings or trees.

Above the proposed podium and adjoining Club/carpark, the only private view impacts would be to buildings that have a height higher than the Club and carpark building. These are non-existent in the surrounding blocks and this is likely to be the case for some time due to the heritage and height controls in the blocks to both the east and west. Higher buildings (up to 66m) are permitted two blocks to the north (part of the recent Parramatta North Urban Transformation rezoning) although higher buildings do not yet exist. In any event, their separation from the site is such that no significant view impacts to or from the hotel would eventuate.

The nearest existing tower likely to have some views over the site is the Meriton "Altitude" development on the southern bank of Parramatta River at 330 Church Street (photo below). This is approximately 550m to the south-east of the site and any view impacts are expected to be minor to negligible in the context and nomenclature in the guiding Land and Environment Court Judgement of *Tenacity Consulting v Warringah* [2004] NSWLEC 140 ("the Tenacity case").

Given the circumstances of the proposal, surrounding development, surrounding planning controls and anticipated impacts, a full visual analysis from private buildings and commentary regarding the Tenacity case is not warranted.

Some qualification to the analysis is needed, as the site has not been viewed within surrounding private properties or dwellings. If a claim of adverse view impacts is made, which has not been anticipated, further analysis and view modelling could be done (provided access is granted for photos and such analysis to be done).





**Photo 18** - Altitude Development (from Victoria Street), 550m from the site

### 6.16 Visual Privacy

The nature of the site, proposed use, adjoining uses, orientation, setbacks and site planning is such that it is self-evident that no unreasonable or significant adverse visual privacy impacts on adjoining land is likely. The site and precinct is an active one, and increase use and surveillance of the area is positive in these circumstances.

The use of rooms also includes privacy louvres and balconies to enable management of internal privacy (and thereby external privacy).

### 6.17 Economic Impacts

In terms of economic impacts, the proposal will cause no negative economic impacts and will result in positive economic impacts from the materials and labour needed for construction and ongoing operation. The increased accessibility of the attractions within Parramatta Park is likely to have some positive indirect economic impacts in terms of businesses located within the Park precinct and the nearby CBD.

The lease arrangements and tenure with the State Government through Parramatta Park Trust will generate an income for PPT, which will assist in funding other Park assets and attractions to the community.

Previous advice has been provided regarding the hotel market by Deloitte, through engagement of hotel design and market specialists, NEM.

NEM have provided a letter (Attachment W) as a market overview report, relevant to consideration of Economic Impacts and considerations. Some key aspects and findings of the work by Deloitte and NEM include:

- The Parramatta market achieved a very strong 79% occupancy at an average rate of \$166 per room (calendar year 2016);
- While there is pending supply, occupancy rates are expected to further improve to around 85% occupancy and improved room rates, to assist viability;
- The Sydney CBD market is very strong and essentially will be "full" in the coming years,;
- The proposed design has a competitive advantage due to the conferencing, function, leisure and active uses, such that it could be a destination, also catering for groups and teams;
- The proposed design has been assisted by specialist input during design development.

A successful hotel will provide economic benefits to the Parramatta CBD, region and surrounding businesses.

### **6.18 Social Impacts**

Social impacts from the proposal are expected to be positive or neutral. No use is being dislocated by the proposal. 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 (addressed and summarised in a following section), 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. 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.

The potential impacts related to crime and the principles of Crime Prevention Through Environmental Design (CPTED) are addressed in the attached CPTED report (Attachment F).

### **6.19 Sea Level Rise and Climate Change**

The site is reasonably well elevated above sea level, by approximately 13m. Basement excavation is limited and provides non-habitable floorspace. The use is not for permanent residential accommodation and will not be strata-titled.

The floor levels have been guided by planning for potential flooding. The site is not bushfire prone and has a number of egress points in case of any emergency.

The proposal should not be unduly compromised by potential impacts associated with climate change.

## 6.20 Flooding and Water Management

### 6.20.1 Water Table and Excavation

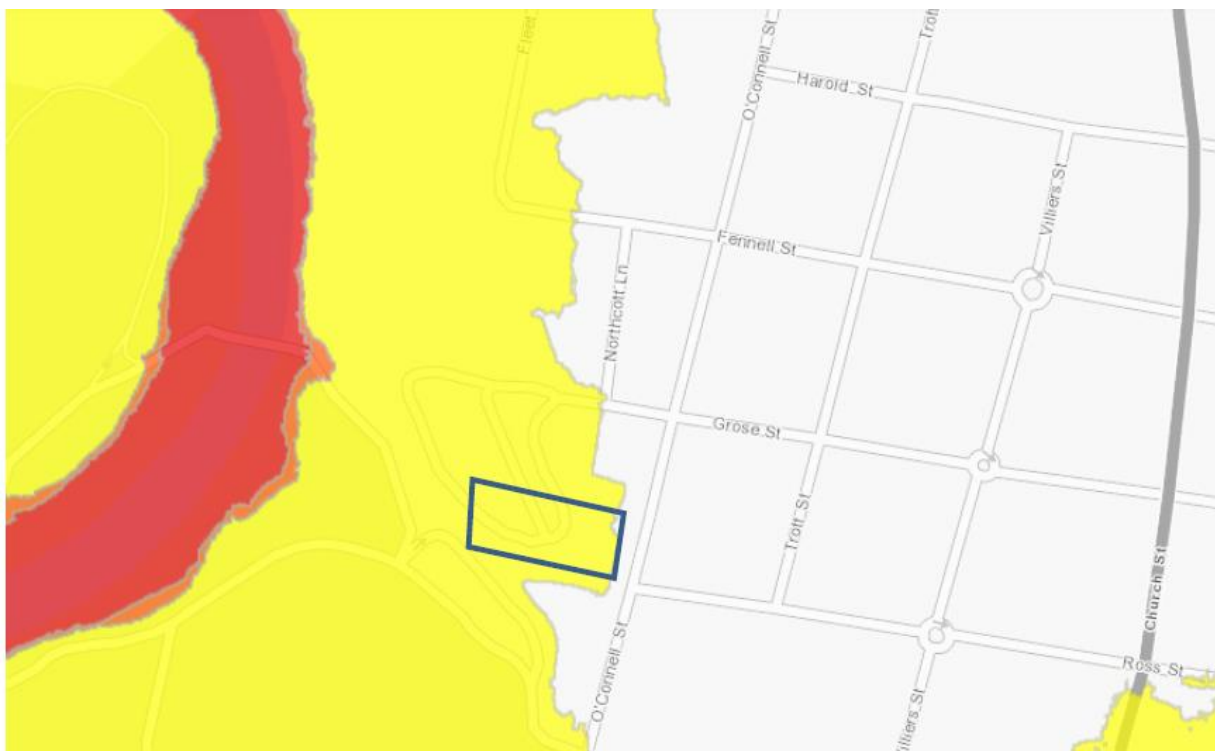
The watertable issues have been addressed previously (Section 6.7) and within the Geotechnical Investigation (Attachment M). The watertable has been found to be below the level of the basement, in the order of several metres.

Water management during excavation can be managed using traditional construction management measures (i.e. seepage after rain), and guided by the provisions of the Remediation Action Plan at Attachment L and the “Blue Book” measures, including:

- Sediment fences;
- A Sediment Basin;
- Vehicle shaker grid and wash down; and
- Sandbags surrounding existing pits

### 6.20.2 Flooding

The flooding aspects of the proposal have been guided by the Civil Stormwater and Flooding Report by TTW (Attachment R). This in turn has been guided by Council specifications and advice, within Council's Local Floodplain Risk Management Policy and PDCP 2011 (Section 2.4.2). The site is on the edge of a “low flood risk” area, shown in the Figure below:.



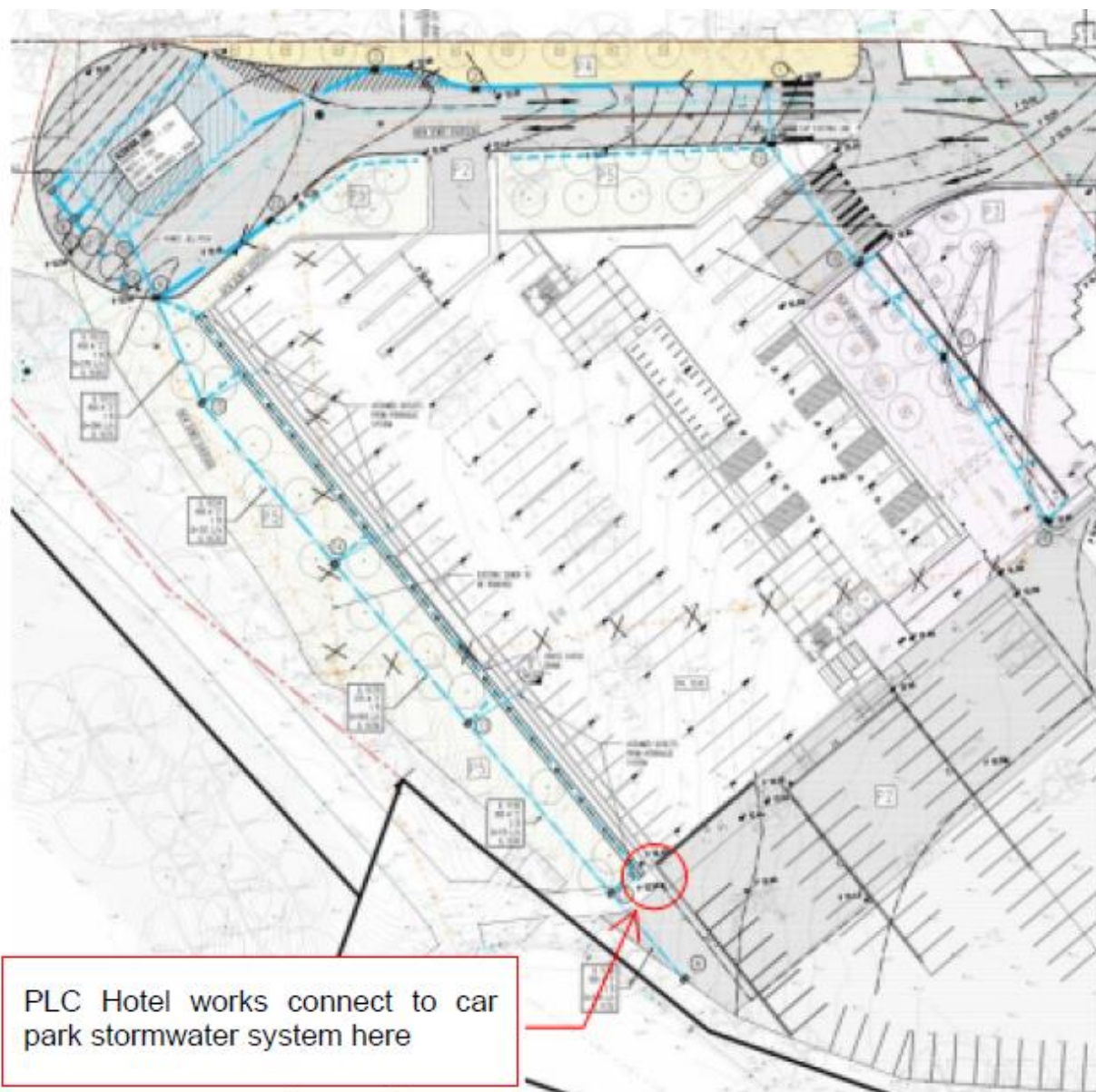
**Figure 39** - Flood Risk Area (Yellow = low), source TTW



The habitable FFL is set at RL 13.85, which is 5.44m above the 1% AEP ("one in hundred year flood"). The proposed design meets flood planning requirements, while also providing good linkages and access to the surrounding park and Stadium.

### 6.20.3 Stormwater

The flooding aspects of the proposal have also been guided by the Civil Stormwater and Flooding Report by TTW (Attachment R). Fortunately, this firm guided the work for the adjoining carpark to the west. Also fortunately, or moreover wisely, the stormwater system including On Site Detention (OSD) for the carpark was designed to accommodate development of the subject site (given it was anticipated at the time). There is a logical and easy connection point to the south-west of the site, shown below:



**Figure 40** - Stormwater connection to OSD and system in place, source: TTW



Stormwater quality analysis was undertaken as part of the design for the system in place, including a process of passing through a GPT (Spel Ecoceptor) and a Spel Hydrosystem to remove gross pollutants, sediments and nutrients from the stormwater (also targeting hydrocarbons given the carpark). The entire site has been modelled in MUSIC to meet treatment targets in PDCP 2011.

The proposal will lead to an improvement to both the stormwater quantity and quality compared to the existing situation, and this is an environmental benefit from the proposal.

## 6.21 Waste Management

The waste management considerations and solutions are addressed in the comprehensive Operational Waste Management Plan by TTM (Attachment V).

This Plan:

- Addresses the requirements of PDCP 2011 and the SEARs;
- Has been prepared by a qualified and experienced specialist firm;
- Evolved after iterative engagement between TTW and the design team, given waste management is a central and important aspect for the proposed use;
- Identifies required plant and recycling needs;
- Addresses waste management from operations, including various sub-uses within the hotel complex;
- Confirms that the plans accommodate the space requirements for appropriate waste management; and
- Considers and addresses access and turning circles to the refuse areas.



**Figure 41** - Truck access to the loading/waste area, source: TTM

The Plan confirms that the proposal will meet all requirements of PDCP 2011. Waste management measures are also addressed in the submitted Plan of Management.

## 6.22 Services and Utilities

The services and utilities have been addressed in Part 3.5 of this Statement.

The site is adequately served by infrastructure to support the proposal, able to be augmented as required for the development.

## 6.23 Construction Management

The main construction-related impacts are anticipated to be related to truck movements, noise, dust and possible discovery of relics.

As previously outlined, overall construction traffic is reasonably reduced by limiting the footprint and depth of the excavation, which also minimises other excavation-related amenity impacts. 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. TTPP have estimated daily truck movements, shown in the following table:

Stage	Approximate Duration (months)	Average Daily Truck Movement Vehicles / day
Demolition	1	5
Excavation	4 - 6	10-20
Building Works	14- 18	40 during concrete pours 10-20 during non pour periods

**Table 14** - Construction Traffic estimates (TTPP)

A draft Construction Traffic Management Plan has been prepared by TTPP (as required by the SEARs). This established principles and a clear framework to develop a Construction Traffic Management Plan, which would be an expected condition of development approval if approval is granted.

In terms of noise and dust, these matters can also be appropriately regulated by conditions of consent. Fortunately, the geotechnical investigation shows the sandstone is relatively deep (and deeper than the basement), with the majority of fill to be removed being sandy loam. This should reduce noise from otherwise cutting rock.

Issues related to possible relics are regulated by different Acts (the Heritage Act and National Parks and Wildlife Acts).

Otherwise, issues of construction hours, construction management, excavation, contamination and the like are able to be addressed by conditions of consent

## 6.24 Operational Issues

Operational issues are addressed in the Plan of Management (Attachment V), Operational Waste Management Plan (Attachment U) and the CPTED Report (Attachment F). These documents form a solid basis for successful operation, along with the design itself.

The proposed hours of operation are:

- The hotel will operate 24 hours a day, 7 days a week.
- The function room will operate from 7am until Midnight Sundays to Wednesdays and until 2am following Thursday to Saturday nights.
- The café will operate from 6am-midnight, 7 days a week.
- The pool, fitness and wellness centre will operate from 6am-midnight, 7 days a week.

These hours are considered appropriate for the proposed uses and sub-uses within the building, given the nature of the site and the sporting, leisure and entertainment precinct in which the site is located.

## 6.25 Site Suitability

The site is suitable for the development. The zoning permits the proposal, and the proposal complies with all standards and objectives of Parramatta LEP 2011. The proposal complements the character and form of the adjoining Club, carpark and Stadium buildings and is contextually appropriate. The site is suited to the proposal, which will be an asset for the precinct. This can occur with limited/acceptable impacts on the amenity of surrounding land.

## 6.26 Cumulative Impacts

The main potential cumulative impacts relate to traffic and parking. This has been addressed in the traffic and parking assessment by TPPP (Attachment K) and previous Section 6.10 of this Statement. These find the impacts will be acceptable.

The other cumulative impact is the overall changing nature of the area from development, including new Stadium, recent carpark, proposal itself an new future development in the blocks to the north. These impacts, in relation to the Park, leisure and entertainment precinct of which the site is part are positive, will help transform and enhance the park setting and the use and enjoyment of adjoining regional sporting and recreational assets.

## 6.26 Public Interest

The public interest will be well served by granting consent.

The perceived public benefits and justification for the proposal is outlined in the concluding Part 9 of this Statement.

## 7 Mitigation Measures

The following outlines mitigation measures utilised in the design/planning ("done"), through recommended measures within various reports or through matters able to be addressed by conditions of development consent ("to be implemented"). These have been grouped into categories of potential impacts.

### Built Form, Design Excellence, Visual Impacts, Overshadowing

#### Done:

- Siting away from sensitive uses, O'Connell Street and Parramatta Park, being key public interfaces;
- Adopt siting to reflect the wider street grid form;
- Adopt a podium form;
- Place higher building form to the north, further away from the Stadium, Park and key entrances to surrounding assets and attractions for pedestrians;
- Engagement of a high quality architectural firm with a good history of engagement with the area and understanding of wider contextual issues;
- Prepare a Design Excellence Strategy and engage with an independent Design Review Panel;
- Refine the design prior to lodgement of DA;
- Engage the building with the public domain;
- Include the surrounding public domain and interface within the scope of the DA, so it is not just for a building;
- Adopt a tower floorplate which is not excessive (around 740sqm GFA);
- Break the tower into components to reduce apparent bulk;
- Use a façade system that provides light, shade and varying materials and textures;
- Visually anchor the ends of the building and balance solid and visually permeable elements;
- Consider key vistas from sensitive heritage areas;
- Consider the surrounding planning controls and height, and mediate between adjoining approved development under construction and anticipated higher building forms to the north;
- Provide an Integrated Landscape Plan;
- Avoiding signage in the rooftop zone.

#### To be Implemented:

- Further review by the independent Design Review Panel, if necessary;
- Ongoing involvement of the architectural firm through the documentation and construction phase;
- Additional tree planting (as included in the Landscape Plan and recommended in the Wind assessment);
- Future DA for any signage, as needed.



## Public Domain, Crime Prevention, Landscaping

### Done:

- Include public domain around building in the scope of the DA (for improvements);
- Integrated Landscape Plan, paving, planting, furniture etc.;
- Active uses integrated with the building at the ground level;
- Ground floor and public domain levels facilitate equitable access;
- Desire lines with the adjoining Stadium and Parramatta Park have been considered;
- Appropriate tree species selection;
- Good lines of sight;
- Improve the current situation;
- Appropriate planning to activate the eastern edge of the site and shielding the adjoining the existing carpark.

### To be Implemented:

- Prior to the issue of an Occupation Certificate, game day management will be settled upon redevelopment and review, post-construction of the Stadium, by Parramatta Leagues Club, in consultation with Venues NSW, Parramatta Park Trust, key sporting bodies using the Stadium venue, NSW Police Service, RMS, TfNSW and Council;
- Prior to the issue of an Occupation Certificate, a CCTV system shall be installed at the premises with coverage of public areas excluding the toilets, and in strategic locations;
- Lighting of the public domain around the proposed hotel and of the public domain areas associated with the proposal and site shall be directed to meet Australian Standards (as appropriate for the enjoyment of the public spaces), while being directed by an ecological specialist recommendation(s) to minimise impacts on the nearby Grey Headed Flying Fox colony;
- Prior to the issue of an Occupation Certificate, a wayfinding strategy shall be developed and implemented, with the approval of Parramatta Park Trust, and following consultation with the City of Parramatta Council and Venues NSW;
- The undercroft area to the north of the hotel and south of Parramatta Leagues Club (opposite the proposed loading area and within the land owned by Parramatta Leagues Club) shall, on game days or events at Parramatta Stadium when large crowds are expected, either be utilised for the sale of food and/or drink (to meet any requirements of the Food Act and Liquor Act), or be appropriately lit.

## Ecological and Biodiversity Impacts and Tree Removal

### Done:

- Limit tree removal;
- Retain large Lemon Scented Gum and make a feature of the tree/asset;
- Integrated Landscape Plan;
- Suitable tree species selection;
- New large native tree replacement (x 11);
- More trees introduced than being removed;

**To be Implemented:**

- Establish erosion and sediment controls as part of the construction management;
- All equipment is to meet Australian standards;
- Shield noise at its source where possible;
- Avoid construction at dawn and dusk when the GHFF colony is returning to roost or leaving to forage;
- Position equipment as far from the GHFF colony as possible;
- Do not shine construction lights towards GHFF colony;
- Install lights on the western side of the construction site so as to point them in the opposite direction to the GHFF colony;
- Minimise the time in which lighting is needed, use lowest possible brightness and turn off lighting at night which may assist in navigation;
- A suitably qualified ecologist is to undertake regular monitoring of the colony for the duration of the works in accordance with a monitoring plan developed by the ecologist;
- Retain Lemon Scented Gum (Tree 82) by utilising tree sensitive design, demolition and construction measures, and installing and maintaining tree protection throughout the works;
- Tree protection will need to be installed and maintained, and adjusted at different stages during the development;
- Trunk protection, ground protection and tree protection fencing will be required at different stages during the development, as shown on the Tree Protection Plan.
- Irrigation will be required for Tree 82;
- All works within the TPZ of Tree 82 are to be installed above grade without excavation into existing soil, to avoid root disturbance;
- No underground services to be routed within the TPZ of Tree 82;
- Project Arborist to be on site during demolition of ground surfaces and other objects within the TPZ of Tree 82;
- Ongoing monitoring of the tree and any works within the TPZ of Tree 82 regularly (monthly) throughout works on site;
- Install eleven (11) medium to large replacement trees (8m-15m mature height) from minimum 200L containers, in suitably prepared and improved landscape soil within the property to offset the loss of tree canopy, as shown on the landscape plans. Trees should be high quality nursery grown plant stock and planted by persons with horticultural qualifications. The trees should be maintained to maturity;
- Ongoing liaison with VNSW and PPT about planting and treatment of the access road.

## **Contamination, Soil, Geotechnical Issues**

**Done:**

- Review and augment previous testing;
- Establish additional groundwater monitoring holes;
- Prepare a Detailed Site Investigation and Remediation Action Plan;
- Minimise the size of the basement and the required depth;
- Include non-habitable spaces in the basement;

To be Implemented:

- Implement R.A.P.;
- Validation process to ensure Remediation works appropriately carried out;
- Classification of and stabilisation of soil (including addressing pH levels);
- Removal to accredited landfill sites as needed.

## Aboriginal and Archaeological Issues

Done:

- Review all available data;
- Review prior detailed excavation testing and findings;
- Limit footprint and depth of excavation.

To be Implemented:

- Undertake archaeological testing and, if required, salvage excavations prior to development commencing;
- A suitably accredited archaeologist who is approved by the Heritage Division to oversee the excavation of sites of State significance will need to be appointed as Excavation Director;
- Archaeological excavations should be undertaken in accordance with the methodology outlined in Section 11 of the Archaeological assessment;
- In the event that historical archaeological relics not assessed or anticipated are found during the works, all works in the immediate vicinity are to cease immediately and the Heritage Division be notified in accordance with Section 146 of the NSW Heritage Act 1977. A qualified archaeologist be contacted to assess the situation and consult with the Heritage Division regarding the most appropriate course of action;
- In the event that Aboriginal archaeological material or deposits are encountered during earthworks, all works affecting that material or deposits must cease immediately to allow an archaeologist to make an assessment of the find. The archaeologist may need to consult with the Office of Environment and Heritage and the relevant Aboriginal stakeholders regarding the find.

## Heritage Impacts

Done:

- Review technical guides and surrounding Conservation Management Plans;
- Undertake accurate visual impact assessment;
- Consider International, Federal, State and Local heritage listings;
- Limit the height of the building;
- Appropriate site selection;
- Provide a large setback to the cottage (former Gatehouse) to the north;
- Omit the former gatehouse demolition from the scope;
- Have a considerable setback to O'Connell Street.

**To Be Implemented:**

- Ongoing liaison with Parramatta Park Trust about public domain and integration/ideas for potential adaptive reuse of the former Gatehouse;
- Consider and comments and review by NSW OEH.

### **Access, Transport, Traffic and Parking**

**Done:**

- Avoid a new road opening to O'Connell Street, but instead widen/refine the approved access road within the VNSW site to the south to avoid any new opening to O'Connell Street;
- Delete previously proposed egress road to O'Connell Street (previously proposed at the request for SEARs stage);
- Retain access to the carpark from Eels Place (and in any emergencies);
- Provide turning circles to meet Australian Standards;
- Provide no additional parking, but use existing carpark and utilise benefits of the capacity of that carpark and counter-cyclical demand between the Club, hotel and Stadium;
- Improve the southern access for the future building on Stadium site to the south of the site;

**To Be Implemented:**

- Prepare a final Construction and Traffic Management Plan prior to the commencement of works;
- Provide a Green Travel Plan prior to issue of the first Occupation Certificate;
- Information regarding public transport and taxi services will be available to customers by the hotel operator;
- Booking of taxis or a ride-share facility will occur by staff on request and when it is necessary for management of patrons or those denied entry;
- Staffing of the port-cochere to oversee and direct traffic as needed.

### **External amenity Impact: Acoustic, Vibration, Air Quality, Odour, Wind, Reflectivity, Views, Privacy**

**Done:**

- Avoid a sensitive use and chose a use compatible with the nature of uses in the precinct;
- Set back the building from O'Connell Street to increase setbacks from surrounding private uses and buildings;
- Plant additional trees (more than to be removed);
- Break the massing of the building both vertically and horizontally, so it is not one contiguous shape;
- Locate the building to be well removed from other taller buildings;
- Provide a podium to limit wind-shear from a vertical surface;
- Limit excavation footprint and depth;
- Provide screening to glazed elements and end walls.



**To Be Implemented:**

- The maximum normal specular reflectance of visible light for any glazing used on the 105° aspect on Levels 6 and above should be 11%;
- The maximum normal specular reflectance of visible light for any glazing used on the 285° aspect on Levels 11 and above should be 15%;
- All other glazing to have a maximum normal specular reflectance of visible light of 20%;
- No amplified music will be played in any outdoor area, able to be audible at any residential premises;
- Compliance with conditions of development consent relating to use of the premises (relating to both plant/equipment and patrons);
- Additional planting as nominated in the Wind Assessment.

## **Economic and Social Impacts**

**Done:**

- Provide additional permanent and construction jobs;
- Provide a use which supports expenditure in the wider area;
- Provide fitness and wellness uses to support healthy living and mental health;
- Provide a Plan of Management with the DA to guide operational impacts;
- Provide a pool in an area where a previous pool was removed;
- Provide an attraction and anchor use to support potential adaptive reuse of the adjoining vacant former gatehouse;
- Help tourism, especially to the Parramatta and Western Sydney region to support infrastructure investment;
- Provide for a market segment (teams, groups etc.), that will assist in the wider tourism destination attraction of Sydney and the region;
- Engage with hotel experts in the design and conceptualisation;
- Improve the ground level and public domain, including increased opportunities for social interaction both within a café and pool, and within the public domain;
- Additional trees for pedestrian enjoyment;

**To Be Implemented:**

- Management and staff will regularly monitor inside and outside the premises (particularly the immediate surrounds) with an aim to prevent patrons loitering in the area as well as taking action to minimise noise and anti-social behaviour;
- It will be the responsibility of the managers and staff to manage patron behaviour whilst leaving the venue;
- The porte-cochere will be managed by hotel staff and will monitor people in the public domain in the vicinity of the hotel. These staff will also monitor the safe movement of larger vehicles and pedestrian use of the porte-cochere at the same time;
- Provision of at least one staff member outside of the premises during busy periods and particularly around closing time to ensure that patrons do not congregate outside of the premises and that they move in an orderly and quiet manner;
- Management and staff will take all reasonable steps to ensure that the behaviour of patrons entering and leaving the premises and whilst at the premises, does not detrimentally affect the amenity of the neighbourhood;

- Patrons who are being overly noisy will be asked by staff to quieten down, or advised that they may be asked to leave;
- Security provision on game days will be discussed and negotiated with NSW Police and Venues NSW;
- Management will implement practices relating to the management of large groups attending the premises to minimise the potential for adverse impacts;
- At closing time staff will ensure that patrons who are not hotel guests leave the premises quickly and quietly and do not congregate in the immediate vicinity of the premises.
- A CCTV system will be installed on the building with coverage of public areas excluding the toilets, and in strategic locations.
- All staff serving alcohol and frontline staff will be trained on the responsible service of alcohol and will all be responsible for monitoring patrons to ensure there is no unruly or drunken behaviour. Such staff will hold current relevant licenses from Liquor & Gaming NSW (or successor in title).

### **Flooding, Water Management, Sea Level Rise and Climate Change**

Done:

- Limit excavation footprint and depth;
- Locate “non-habitable” uses in the basement;
- Locate ground level and entries to meet Council's flooding specifications;
- Provide more trees than being removed;
- Provide on-site detention and accommodate water reuse;
- Locate hotel ground floor uses well above sea level (approximately 13m);
- Locate in an area not sensitive to bushfire threat;
- Provide several points of entry/exit;
- Provide planting areas on the podium and roof, as well as the public domain.

To Be Implemented:

- The recommended flood evacuation route during PMF conditions is to have a marshalling area on Eels Place which sits above the PMF level, with final evacuation north along O’Connell Street, consistent with Parramatta Local Disaster Plan (2010).

### **Building Sustainability, Safety, Operation, Services, Utilities and Waste**

Done:

- Sustainability engineers involved in design;
- Services Engineers checked services and utility availability;
- Provide a Plan of Management and Operational Waste Management reports;
- Appropriate expert engagement;

To Be Implemented:

- Recommendations within the ESD report by JHA to be implemented;
- LED lighting should be used throughout assisted by occupancy, daylight, time and zone controls.

- Management will deal with any complaints received in a sympathetic manner and fully address any reasonable concerns of persons in the area or other third parties without the involvement of the Council or the New South Police, where possible;
- The following plans will be put in place in case of any emergency of evacuation required:
  - a. Procedures of any governing authorised authority(s) will be followed in times of extreme emergency;
  - b. All staff will be aware of emergency exists and safe refuge areas for gathering near the premises;
  - c. Procedures for responding to bomb threats or other emergencies will be placed in a prominent area used by staff;
  - d. All required Fire Safety Certificates and emergency equipment will be held and maintained on site;
  - e. A first aid kit and fire-fighting equipment will be provided in an accessible place(s) for staff;
  - f. The most senior manager will take responsibility for communication with other staff and customers regarding safe evacuation.
- Waste management to be in accordance with the recommendations and controls within the submitted Waste Management Plan by TTM.

## Construction Impacts

Done:

- Access options from O'Connell Street and Eels Place;
- Draft Construction Management Plan (by TTPP);
- Impacts to the north shielded by the Club building;
- Impacts to the west shielded by carpark building;
- Preparation and submission of an Environmental, Construction and Waste Management Plan;
- Minimise the footprint and depth of excavation;
- Ability to use pre-cast building elements (also assisting with quality control);
- It is noted there is some self-interest in that the Club must reduce impacts to avoid impacts on its own use and adjoining Club building, uses and income.
- Room on site for machinery, storage and cranes with unlikely need for use of roads for loading/cranes etc.;

To Be Implemented:

- Prepare a final Construction and Traffic Management Plan prior to the commencement or works;
- If, during construction, an item of equipment exceeds either the noise criteria at any location or the equipment noise level limits, the following noise control measures, together with construction best practices, shall be considered to minimise the noise impacts on the neighbourhood.
  - Schedule noisy activities to occur outside of the most sensitive times of the day for each nominated receiver.

- Consider implementing equipment-specific screening or other noise control measures recommended in Appendix C of AS 2436-2010.
- Limit the number of trucks on site at the commencement of site activities to the minimum required by the loading facilities on site.
- When loading trucks, adopt best practice noise management strategies to avoid materials being dropped from height into dump trucks.
- Avoid unnecessary idling of trucks and equipment.
- Ensure that any miscellaneous equipment (extraction fans, hand tools, etc.) not specifically identified in this plan incorporates silencing/shielding equipment as required to meet the noise criteria.
- Construction works to be carried out in accordance with the "Blue Book" erosion and sediment control requirements.



## 8 Environmental Risk Assessment

The following environmental risk assessment undertakes a conventional approach of establishing the significance of the potential impacts of the proposal against a range of environmental considerations, then considers the ability to mitigate those impacts to then establish the residual risk posed by the development, against those environmental impacts.

The mitigation measures utilised against these environmental impacts have been outlined in the previous Section of this Statement, and include a number of mitigation measures undertaken in the planning and design, as well as mitigation measures to be implemented as part of the process of detailed design, construction and operation.

The potential severity rating has been assigned using the approach depicted in the table below:

		Potential Severity Rating			
		Minor	Moderate	Significant	Catastrophic
Likelihood severity occurs	Very Likely	Moderate	High	Extreme	Extreme
	Likely	Low	Moderate	High	Extreme
	Unlikely	Very Low	Low	Moderate	High
	Rare	Very Low	Very Low	Low	Moderate

**Figure 42** - Risk Rating (source: Arriscar)

The rating given is in relation to **negative** impacts (therefore a resulting impact that is positive is given a very low rating).

The following table outlines the risk assessment, as moderated by mitigation measures.

Issue	Key Risks	Risk Rating	Residual Risk	Comment
<b>European Heritage</b>	<ul style="list-style-type: none"> <li>Impact to OGH area</li> <li>Visibility from Park and OGH</li> <li>Impact on nearby items</li> </ul>	High	Low	<ul style="list-style-type: none"> <li>Mitigated by building height to limit visibility</li> <li>Impact on nearby items reduced due to setback and setting</li> <li>Below tree line from key vistas</li> </ul>
<b>European Archaeology</b>	<ul style="list-style-type: none"> <li>Footings of former mud lodge</li> </ul>	Moderate	Low	<ul style="list-style-type: none"> <li>Data not clear, but possible existence</li> <li>Ability to be more certain with pre-excavation testing</li> <li>Opportunity for interpretation with adjoining Gatehouse</li> </ul>
<b>Indigenous Archaeology</b>	<ul style="list-style-type: none"> <li>Former artefacts under building</li> </ul>	Low	Low	<ul style="list-style-type: none"> <li>Previous extensive testing of the adjoining and subject site provides good data</li> <li>Establish protocol for unexpected finds</li> <li>Protection by NPW Act 1974</li> </ul>
<b>Urban Design/Visual</b>	<ul style="list-style-type: none"> <li>Visual Impacts to the surrounding area</li> <li>Context of building height with other buildings</li> </ul>	High	Low	<ul style="list-style-type: none"> <li>The existing and future height of buildings in the wider area is known or relatively certain</li> <li>The height mediates between adjoining existing heights or permitted heights</li> <li>Impacts reduced due to setback to O'Connell Street</li> <li>Tower design and footprint not excessive</li> </ul>
<b>Traffic</b>	<ul style="list-style-type: none"> <li>Traffic impacts from extra movements</li> <li>Impacts from works on O'Connell, Street</li> <li>Impacts during match/event days at Stadium</li> <li>Construction traffic</li> </ul>	High	Low	<ul style="list-style-type: none"> <li>Minimal impact from additional traffic</li> <li>Assisted by existing parking area and a use likely to support and reduce wider traffic impacts from users of the Stadium during match/event days</li> <li>Design accommodates rational access/egress</li> </ul>

<b>Parking</b>	<ul style="list-style-type: none"> <li>Increased parking demand in the surrounding area</li> </ul>	Moderate	Low	<ul style="list-style-type: none"> <li>Utilises existing carpark with a use with counter-cyclical demand to the Club (peak book in and book out times not high demand for Club)</li> <li>Use not a high parking generating use</li> </ul>
<b>Crime</b>	<ul style="list-style-type: none"> <li>Increased crime form increased people or conflict</li> <li>Opportunities from crime within the new public domain</li> </ul>	Moderate	Low	<ul style="list-style-type: none"> <li>Improved public domain and surveillance compared to existing</li> <li>Active uses around the ground floor improves sight-lines and surveillance</li> <li>Recommendations in CPTED Report</li> </ul>
<b>Trees and Landscape</b>	<ul style="list-style-type: none"> <li>Loss of trees</li> <li>Impact on landscaped setting of the site</li> </ul>	Moderate	Low	<ul style="list-style-type: none"> <li>Mitigated by new planting to more than offset tree removal</li> <li>Landscaped setting of the site improved</li> <li>Most significant tree retained</li> </ul>
<b>Ecology</b>	<ul style="list-style-type: none"> <li>Loss of native trees</li> <li>Impact on food for fauna</li> <li>Impact on GHFF colony</li> </ul>	High	Low	<ul style="list-style-type: none"> <li>Minimal tree loss compensated by new trees</li> <li>Well removed from GHFF colony</li> <li>Measures during construction can reasonably reduce impacts and "comfort" of colony</li> <li>Adjoining carpark helps shield impacts to GHFF</li> </ul>
<b>Contamination</b>	<ul style="list-style-type: none"> <li>Contaminated soil</li> <li>Asbestos in ground</li> </ul>	Moderate	Low	<ul style="list-style-type: none"> <li>Good testing has occurred</li> <li>Process and impacts mitigated by a Remediation Action Plan</li> </ul>
<b>Groundwater</b>	<ul style="list-style-type: none"> <li>Existing ground water intercepted and affected off site</li> <li>Groundwater lowered</li> </ul>	Low	Very Low	<ul style="list-style-type: none"> <li>Good testing has occurred and baseline data</li> <li>Groundwater below the lowest level of the basement</li> <li>Basement level small and would not affect wider watertable</li> </ul>

<b>Flooding</b>	<ul style="list-style-type: none"> <li>Flooding impacts to building/ habitants</li> <li>Increased flooding offsite</li> <li>Need to evacuate in emergency</li> </ul>	Moderate	Low	<ul style="list-style-type: none"> <li>Building is designed to meet Council flooding requirements</li> <li>Basement small and not habitable</li> <li>Use not a sensitive use</li> <li>Good access to surrounding areas and evacuation points</li> </ul>
<b>Surface Water Quality</b>	<ul style="list-style-type: none"> <li>Reduction in water quality to Parramatta River from site</li> </ul>	Moderate	Very Low	<ul style="list-style-type: none"> <li>Improvement compared to current situation</li> <li>Increased landscaped area</li> <li>OSD on site</li> </ul>
<b>Surface Water Quantity</b>	<ul style="list-style-type: none"> <li>Increase in surface water runoff</li> </ul>	Moderate	Very Low	<ul style="list-style-type: none"> <li>Improvement compared to current situation</li> <li>Increased landscaped area</li> <li>OSD on site</li> </ul>
<b>Geotechnical/ Land stability</b>	<ul style="list-style-type: none"> <li>Soil cannot support building</li> <li>Impact on site stability</li> </ul>	Moderate	Very Low	<ul style="list-style-type: none"> <li>Site flat/stable</li> <li>Excavation limited</li> <li>Good data</li> <li>Construction guided by Geotechnical testing and supervision</li> </ul>
<b>Noise</b>	<ul style="list-style-type: none"> <li>Impacts from the use on the neighbours</li> <li>Impacts from construction</li> <li>Impacts to users from outside</li> </ul>	Moderate	Low	<ul style="list-style-type: none"> <li>The use/plant is not a typical noise-generating use</li> <li>Mitigation measures guided by acoustic assessment and recommendations</li> <li>Soil not rock and excavation limited</li> <li>Acoustic report done</li> </ul>
<b>Vibration</b>	<ul style="list-style-type: none"> <li>Adjoining buildings affected from excavation/construction or use</li> </ul>	Low	Very Low	<ul style="list-style-type: none"> <li>Soil not rock and excavation limited</li> <li>Applicant owns adjoining building</li> </ul>
<b>Building Safety</b>	<ul style="list-style-type: none"> <li>Safety in case of fire or emergency</li> </ul>	High	Low	<ul style="list-style-type: none"> <li>Guided by BCA and access advice</li> <li>Building sprinklered – most effective fire suppressant</li> <li>Not a high hazard area</li> </ul>
<b>Accessibility</b>	<ul style="list-style-type: none"> <li>Accessibility to and within building</li> </ul>	Moderate	Low	<ul style="list-style-type: none"> <li>Improved access ways</li> <li>Public domain designed to meet Australian Standards</li> </ul>



	<ul style="list-style-type: none"> <li>• Accessibility around the precinct and public domain</li> </ul>			<ul style="list-style-type: none"> <li>• Liaison with VNSW and PPT on integration with surrounds</li> <li>• Building guided by BCA and access advice</li> </ul>
<b>Dust</b>	<ul style="list-style-type: none"> <li>• Dust from construction or use</li> </ul>	Moderate	Low	<ul style="list-style-type: none"> <li>• Soil not rock and excavation limited</li> <li>• Adjoining Building to the north owned by applicant and generally limited openings</li> <li>• Good surrounding landscaping</li> <li>• Lack of sensitive immediate uses adjoining site</li> <li>• Adjoining buildings help screen wind and thereby dust</li> </ul>
<b>Air Quality</b>	<ul style="list-style-type: none"> <li>• Reduced air quality from use and operation</li> <li>• Reduced air quality from construction</li> </ul>	Low	Very Low	<ul style="list-style-type: none"> <li>• Not a polluting use</li> <li>• Construction impacts can be monitored and regulated by conditions of consent and management</li> </ul>
<b>Odour</b>	<ul style="list-style-type: none"> <li>• Smells from use and operation</li> <li>• Odour from contaminants</li> </ul>	Low	Very Low	<ul style="list-style-type: none"> <li>• Testing of soil reveals no biodegradable substances</li> <li>• Use not associated with producing odour</li> <li>• Plant and equipment within the building and contained</li> <li>• Need to ensure comfort of hotel guests</li> </ul>
<b>Views</b>	<ul style="list-style-type: none"> <li>• Loss of views to surrounding private land</li> </ul>	Low	Very Low	<ul style="list-style-type: none"> <li>• Site well removed from other existing buildings where views likely to be an issue</li> <li>• Large setbacks</li> <li>• Nature of surrounding uses and planning controls to the immediate east</li> </ul>
<b>Social Impacts</b>	<ul style="list-style-type: none"> <li>• Impacts on the community from the use and future users</li> </ul>	Moderate	Very Low	<ul style="list-style-type: none"> <li>• Positive social impacts</li> <li>• Increased opportunity to meet</li> <li>• Healthy living choices provided</li> </ul>

				<ul style="list-style-type: none"> <li>• Supports wider area and region</li> </ul>
<b>Economic</b>	<ul style="list-style-type: none"> <li>• Impacts on surrounding businesses from use</li> <li>• Impacts on surrounding businesses from construction</li> <li>• Wider and longer term economic impacts</li> </ul>	Moderate	Very Low	<ul style="list-style-type: none"> <li>• Positive economic impacts</li> <li>• Provides permanent and construction jobs</li> <li>• Local job opportunities</li> <li>• Well separated from businesses and construction impacts localised</li> <li>• Support for wider CBD and region</li> </ul>
<b>Climate Change</b>	<ul style="list-style-type: none"> <li>• Impacts from potential sea level rise, more extreme weather patterns</li> </ul>	Moderate	Low	<ul style="list-style-type: none"> <li>• Located reasonably well above sea level</li> <li>• Not within a bushfire area</li> <li>• Not used for permanent residential accommodation</li> <li>• Not strata titled</li> </ul>
<b>Wind/ Pedestrian comfort</b>	<ul style="list-style-type: none"> <li>• Impacts from wind and down-draughts on people in the public domain or other buildings</li> </ul>	Moderate	Very Low	<ul style="list-style-type: none"> <li>• Guided by expert reporting and wind tunnel testing</li> <li>• Recommendations of wind testing able to be accommodated</li> <li>• Building provides a podium to help defray down draughts</li> </ul>
<b>Reflectivity</b>	<ul style="list-style-type: none"> <li>• Impact on motorists and pedestrians from the building</li> </ul>	Moderate	Very Low	<ul style="list-style-type: none"> <li>• Façade modulated</li> <li>• Balconies and screening inside glazed elements</li> <li>• Solid elements in building ends</li> <li>• Guided by expert assessment and recommendations</li> </ul>
<b>Waste Production</b>	<ul style="list-style-type: none"> <li>• Waste from demolition and excavation</li> <li>• Waste from ongoing use</li> </ul>	High	Moderate	<ul style="list-style-type: none"> <li>• Minimal demolition waste</li> <li>• Excavation limited</li> <li>• Ongoing waste will occur from operations, partially mitigated by design, but inherent in human use and consumption</li> <li>• Waste from the use has been reasonably reduced and designed to meet Council specifications</li> </ul>

**Table 15 - Environmental Risk Assessment Summary**

As above, there a number of potential environmental impacts with high potential risk. However, with the mitigation measures and attention to those risks through the planning and design phase, as well as mitigation measures through design detailing, construction and operation, all these environmental risks are able to be appropriately managed and the residual risk reduced to an appropriate and acceptable level.

## 9 Public Benefits, Justification and Conclusion

The proposal involves a new 17 storey hotel with 209 rooms and ancillary fitness, wellness, function and bar areas.

The following summarises the public benefits of the proposal and the justification for approving the proposal:

1. The proposal will provide approximately 150 FTE operational jobs and approximately 200-250 construction jobs;-
2. The use will support the economy and businesses of the Parramatta CBD and attractiveness of both Parramatta and Western Sydney more generally;
3. The proposal will help support significant investment by the State, local and Federal Government in infrastructure in the area, including Parramatta Park, Parramatta Stadium, Parramatta Light Rail, Western Sydney airport and public transport initiatives;
4. The proposal will help bolster tourism and investment in Parramatta;
5. The proposed use and ancillary uses within the building are ideally suited to the site and precinct of which it is part;
6. The use has been designed and targeted at groups, teams and corporate customers, which also supports use of the adjoining Park, Stadium and Parramatta CBD;
7. The proposal will help activate the site and area, benefitting both pedestrians and the visual amenity of the area;
8. The proposal is a significant improvement compared to the current situation;
9. The proposal can be considered consistent with the principles of Ecologically Sustainable Development;
10. The most significant tree on site is being retained and celebrated (more so than currently), and the removal of 7 trees is more than offset by appropriate new mature native planting;
11. The proposal will provide better activation of the public domain around the site, in turn assisting with surveillance and safety, particularly during busier times;
12. The proposal provides a pool, gym, active and wellness uses, which support healthy living and community well-being;
13. The proposal exhibits design excellence, arising from long and detailed consideration of the site and its context, developed over several years and assisted by a well-regarded architectural firm, a Design Excellence Strategy and review by an independent Design Review Panel, chaired by the Office of Government Architect;
14. The design celebrates a hotel in the park, utilising place and design to create a point of difference;
15. The massing, height and form has carefully considered the interface with the surrounding area (existing and future) and specifically considered key vistas to and from the Old Government House Domain and Parramatta North Historic Sites, to ensure no significant impacts on the significant heritage values of the adjoining precinct;



16. The proposal will cause no significant adverse impacts on the heritage significance of other places of heritage significance;
17. The proposed flexible function area will be an asset to the area and Parklands;
18. The proposal will help reduce car reliance by the removal of existing at-grade parking, provision of existing and optimised parking on site and provision of visitor accommodation close to regional assets, to reduce travel to and from the precinct, including during busy game/event days at Western Sydney Stadium when users of the hotel have little distance to travel;
19. The proposal will ultimately improve future access to the Western Sydney Stadium site and northern building (which has a Stage 1 DA approval), without relying on an unsustainable managed traffic solution;
20. The proposal will assist in the long term financial sustainability of Parramatta Leagues Club, diversifying income and providing services and support for the community uses and regional sporting team;
21. The proposal will provide income to the Government through a lease of the land, which will provide revenue for other public services, while being at no cost to the Government;
22. The proposal complies with the relevant aims of Parramatta Local Environmental Plan 2011;
23. The proposal complies with the objectives of Zone R2 – Private Recreation within Parramatta Local Environmental Plan 2011 and is specifically permissible in the zone;
24. No development standards are being breached;
25. The in-ground aspects and potential impacts are well understood due to previous and augmented soil testing, assisted by a relatively small and shallow basement, and pose no unmanageable impacts;
26. Various aspects of the proposal have been subject to analysis by a wide range of relevant experts;
27. The environmental impacts of the proposal are positive, acceptable or manageable;
28. The proposal is consistent with the objectives and controls within Parramatta Development Control Plan 2011;
29. The site benefits from a lack of immediately adjoining sensitive uses, while proposed setbacks, the existing Club building to the north and Stadium to the south also provides some shielding to the surrounding area and other private uses, such that there are no unreasonable amenity impacts to other land;
30. The infrastructure of the area can support the proposal;
31. The proposal would not give rise to any negative precedents or unreasonable cumulative impacts; and
32. Granting consent would be in the public interest by providing a use suited to the area, a well-considered design, improved public domain, and acceptable environmental impacts.

The proposal is suited to the site and surrounds, the design and mitigation measures appropriately consider and address potential impacts, and the benefits of the proposal outweigh any impacts. This Statement concludes the proposal should be approved.

## Attachments

A	Architectural Plans
B	Landscape Plans
C	Site Survey and Title Information
D	Design Report
E	Design Review Report and Design Excellence Strategy
F	Crime Prevention Through Environmental Design (CPTED) Report
G	Heritage and Visual Impact Assessment
H	Aboriginal Due Diligence and Historical Archaeological Assessment
I	Arboricultural Impact Assessment
J	Biodiversity Development Assessment Report
K	Traffic and Accessibility Impact Assessment (and Parking)
L	Detailed Site Investigation and Remediation Action Plan
M	Geotechnical Investigation
N	Ecological Sustainable Development Report
O	Environmental, Construction and Site Management Plan
P	BCA and DDA Compliance Statement
Q	Noise and Vibration Impact Assessment
R	Civil Stormwater and Flooding Report
S	Pedestrian Wind Environmental Study
T	Solar Light Reflectivity Study
U	Operational Waste Management Plan
V	Plan of Management
W	Market Overview Report
X	Cost Report