



Your Reference: SSD 8800
Our Reference: NCA/8/2017
Contact: Myfanwy McNally
Telephone: 9806 5447

6 November 2017

Ellen Mannix
Department of Planning and Environment
22-23 Bridge Street
Sydney NSW 2000

Dear Ms. Mannix

Re: Request for SEARs – Parramatta Leagues Club Hotel at 1 Eels Place, Parramatta (SSD 8800)

The City of Parramatta Council thanks you for the opportunity to comment prior to the preparation of the Secretary's Environmental Assessment Requirements (SEARs).

The documentation that accompanied the proposal has been reviewed by internal departments and the City of Parramatta requests that SEARs include the following:

Traffic and Transport

A **Traffic and Transport Impact Assessment Report** is required for the proposed development to identify the impacts of the proposal on the local street network and mitigation measures required to ameliorate any impacts. This report should assess the suitability of the access (entry and exit) points, internal layout, parking and traffic generation. Loading arrangements for both the Leagues Club and the proposed hotel are to also be provided showing how potential conflicts with pedestrians are avoided.

The surrounding area is undergoing extensive large-scale construction projects. As such it is recommended that a **Construction Traffic Management Plan Concept** be included along with the Transport Impact Assessment. The Traffic Management Plan should include consideration of surrounding developments.

The hotel must not only interface with the Western Sydney Stadium boundary, but also into the wider Parramatta walking and cycling network. Namely the river foreshore path and the O'Connell Street shared paths through the provision of walking and cycling links in the public domain area.

Land Use Matrix

In addition to the statutory provisions listed in the Request for SEARS the application should reference the draft Parramatta CBD Planning Proposal endorsed by Council on 11 April 2016, covering off the following matters:

1. Statement demonstrating how the proposal meets the objectives and intended outcomes of the draft Parramatta CBD Planning Proposal https://www.cityofparramatta.nsw.gov.au/sites/council/files/inline-files/Planning_Proposal_-_Parramatta_CBD_April_2016.pdf
2. Statement demonstrating how the proposal is consistent with the type and scale of development (height, FSR and the like) permitted in the draft Parramatta CBD Planning Proposal.
3. Provision of end of journey facilities (clause 7.13)
4. Energy and water targets (clause 7.17)
5. Provision of dual water systems (clause 7.18)

The subject site is located within close proximity to land identified as “Biodiversity” conservation under the Parramatta Local Environment Plan 2011 where the grey-headed flying fox colony can be found. A statement is required in the EIS and appropriate NSW State Government agency referral to address impacts on the land identified as “Biodiversity” and buffer area.

The subject site is located within the ‘Park Edge Special Area’ (Parramatta DCP 2011) and the Conservation Agreement between the Commonwealth, the State and the City of Parramatta. A statement is required in the EIS addressing compliance with the planning controls, and whether a referral to the Commonwealth is required under the Environment Protection and Biodiversity Conservation Act 1989. We recommend contact is made with the Federal Department of Environment and Heritage to determine requirements under the EPBC Act.

Flooding

Flood modelling should be undertaken in a combined overland flow and river flood study to identify affectation across the site. The allocation of finished floor levels is to directly respond to the PMF and 1% AEP flood levels. All basement level critical plant facilities are to be kept water tight and remain flood proofed.

A Flood Emergency Response Plan must be prepared to demonstrate how emergency services may gain access to people needing help on the site and how occupants may evacuate during floods up to the PMF. The proposal must include estimated numbers of people likely to be using the facility, the duration of floods, evacuation areas and post flood refuge.

Stormwater

The specification of rainwater and stormwater management is prepared on basis of overland flow paths. A water management plan should implement Water Sensitive Urban Design principles as set out in Council's DCP 2011 to demonstrate compliance with water quality and pollutant reduction goals. On Site Detention of stormwater is to be provided for parts of the site not flooded by the 1% AEP event, in accordance with the Upper Parramatta River Catchment Trust handbook edition 3 or 4, unless the proponent can demonstrate that such OSD would adversely affect flooding.

Construction Management

A Construction Environmental Management Plan and System to demonstrate sustainable management of the work, protection of the environment from construction especially in a noise impact assessment on nearby educational establishments and the protection of the site from environmental factors such as flooding.

Acoustic Impacts

The operational noise generated by the Western Sydney stadium must be considered in an Operational acoustic management plan or alternatively addressed through the design specification of glazing.

Heritage

A Heritage Impact Statement (HIS) should be included to demonstrate the proposal has considered the adjacent North Parramatta heritage conservation area, Parramatta Park and the proposed demolition of the O'Connell Street Gatehouse.

Recreation

A precinct master plan is recommended to display pedestrian site through links with the adjoining Western Sydney Stadium. This is to clearly show how the impact on the Parramatta Park open space will be managed in regards to pedestrian movement from hotel to the stadium.

Social Outcomes

The EIS is to be accompanied by a social impact assessment (SIA) prepared by a suitably qualified social planner. The SIA should, at a minimum address the following: onsite and adjacent liquor and gambling uses; community use; accessibility; construction impacts; patron amenity; heritage impacts – Indigenous community; and reference the City of Parramatta Council's draft Social Infrastructure Strategy.

In addition to the SIA, given the mixed use nature of the proposed development, a Plan of Management should also be submitted to manage conflict between hotel patrons and special event visitors along with an emergency evacuation plan.

Ecological Consideration

The SEARs must include an Ecological Impact statement, which assess the effect of the built form on the nearby Grey Headed Flying-Fox camp and endemic bird population. Potential mitigation strategies are to minimise bird collision through the use of UV reflective/patterned glass or consider the addition of a green wall/roof to limit glass surfaces and stormwater runoff.

Landscaping

An Arborist Report is required, comprising a preliminary tree assessment and development design of the subject site, the street reserve and adjoining sites. Moreover, an Arboricultural Impact Assessment (AIA) and Tree Protection Plan (TPP) prepared by an AQF Level 5 arborist must be also contained within the SEARs.

Environmental Sustainability

The SEARs is to ensure the quality of development with references made to the attainment of suitable sustainability targets with a targeted 5 Star GreenStar Rating.

Council requires the proposal to commit to a NABERS Energy Commitment Agreement targeting 5 Stars. NABERS Water should be provisioned as a "Hydraulic Engineers report", to demonstrate the hotel design will achieve 4.5 NABERS water rating. The validation of actual performance in the completion of a formal NABERS Rating assessment undertaken within 18 months of hotel commencing regular operation.

The proposed Tri-Generation is to be captured within the SEARs and the full detail of the commitment must be outlined at the EIS development stage. This will convey how it will be procured and alternate measures in the case the system is decommissioned into the future.

Built form and Urban Design

The SEARS should include an architectural reference design that is to indicate the approved stadium scheme; a sight lines and view corridor analysis; the levels/vegetation/activation of the O'Connell St and vehicular access handle domain interface and vehicular access handle pedestrian crossings.

As discussed in the traffic section a detailed analysis of vehicular and pedestrian movements is to be provided to ensure that there is no conflict

between the Porte Cochere and loading areas of both the Leagues Club and the proposed hotel and surrounding pedestrian areas.

Public Domain Plan

The public domain must be redeveloped in accordance with Council's current planning controls along with the heritage and view controls of the OGHD. It must clearly indicate how circulation will be affected as a result of this development in the precinct.

The proposed commercial GFA is expected to significantly increase the footfall within this precinct. Council expects a public domain outcome over and above the provision of a S94 levy. It is recommended that a public domain upgrade plan (identifying the nature and extent of key works) is provided for the street frontage of O'Connell St and the curtilage along the stadium boundary. This plan should identify the:

- extent of the new/increased street front retail/commercial/active uses introduced accessed directly from the street,
- new spill over uses like cafes and outdoor dining,
- new pedestrian entrances/ through site links,
- extent of upgraded paving, new street trees and lighting
- night lighting/ down-lighting/ CPTED measures and
- quality architectural finishes (including screening and signage) to the street wall visible from a pedestrian eye level.

Design Excellence

The City Architect Team make the following recommendations to ensure Design Excellence is delivered for this proposal:

- Acknowledge that Hassell are best placed, based on their previous commissions with the landowners, to design and deliver the proposal,
- Support the establishment of a Design Review Panel (DRP). The DRP should consist of a minimum of 3 and maximum 5 panel members (to ensure a majority).
- The DRP should not be represented by a principle of the applicants architectural practice (as this is a conflict of interest)
- The OGA (Office of the Government Architect) should be responsible for the establishment of the DRP, its members and the panels terms of reference,
- The City Architect should be nominated as City of Parramatta Councils representative on the DRP.
- Presentations to the DRP should occur, at a minimum at the following stages: EIS, Response to Submissions and at construction certification. This will ensure the integrity of the proposal is maintained throughout the delivery of the project.

- All recommendations and minutes from the DRP should be available to both the Department of Planning and City of Parramatta Council.

Shadow Diagrams

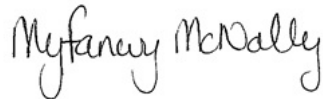
Hourly overshadowing plans should be included in the application for summer solstice, winter solstice and equinox. Diagrams are to clearly show the shadow impacts of the proposal on the surrounding sites and the public domain. Of particular note are the future Infrastructure NSW development and Parramatta Park located to the south of the site.

Next Steps

Thank you for your consideration of Council's recommendations. We look forward to working with the Department of Planning and Environment in order to resolve the abovementioned issues as the project progresses.

To this end Council would appreciate the opportunity to discuss the proposal with the projects architecture and planning consultants. This meeting can be arranged by contacting the City of Parramatta Council's City Significant Team on 02 98065447.

Yours sincerely,



Myfanwy McNally
Manager of City Significant Development