

Mr Mark DeSylva
Schools Development Manager
12 Victoria Road
Parramatta New South Wales 2150

07 May 2020

Dear Mr DeSylva

Westmead Catholic Community Education Campus (SSD-10383)
Response to Submissions

The exhibition of the development application including the Environmental Impact Statement (EIS) for the above proposal ended on 29 April 2020. All submissions received by the Department of Planning, Industry and Environment (the Department) during the exhibition of the proposal are available on the Department's website at:

<https://www.planningportal.nsw.gov.au/major-projects/project/25716>.

The Department requires that you provide a response to the issues raised in those submissions, in accordance with clause 85A(2) of the Environmental Planning and Assessment Regulation 2000 (the Regulation). Please note that the comments from Sydney Water, Government Architect NSW and the Department of Primary Industries are outstanding. The Department will provide you with a copy of their submissions when received.

The Department has also undertaken a preliminary assessment of the EIS and, in addition to the issues raised in submissions, requires that the matters at **Attachments 1** and **2** be addressed in full.

Note that under clause 113(7) of the Regulation, the days occurring between the date of this letter and the date on which your response to submissions is received by the Secretary are not included in the deemed refusal period.

If you have any questions, please contact Prity Cleary, who can be contacted on (02) 8289 6795 or at prity.cleary@planning.nsw.gov.au.

Yours sincerely



Karen Harragon
Director, Social And Infrastructure Assessments
Social & Infrastructure Assessments

as delegate for the Planning Secretary

ATTACHMENT 1 – KEY ISSUES

1. Proposed built form and open space

- The Department notes that the proposed built form of the primary school is designed to integrate the open space in various levels of the building. Whilst the EIS includes details of the open spaces, the Department raises the following concerns with regard to the proposed design of these areas:
 - the site has scope for providing ground level open space areas. However, these areas have not been utilised for the purpose of open space. The running track for the children is provided on the roof space instead of utilising areas at the ground level.
 - no details have been provided regarding the solar access / daylight access provisions to the upper level open spaces. Given the nature and design of the open spaces, it is likely that these areas would not receive sufficient sunlight (in excess of three hours) during the winter solstice.
 - the proposal does not provide the details of the area of open space provided within the building. While there are no minimum requirements for the area of open space per student, Department of Education provides guidance / standards for the minimum area of open spaces required per student within a school. Department of Education's should be used as a guide to demonstrate that suitable open space areas have been provided per student within the site.
 - the open space diagrams indicate that circulation areas in between classrooms have been added as open spaces. The circulation areas should be deleted from the calculation of open space areas.
 - the integration of open spaces with the classrooms in one level may result in adverse noise impacts on the student groups located at other levels of the building. In this regard details of acoustic insulation between the floors or timing of usage of the open spaces on each level (especially the mid-level open area) should be provided.
 - the handball court located on the ground level of the K – 6 building. No details have been provided to demonstrate that a handball court is suitable and that the amenity is appropriate to be locate in this enclosed area.
 - no details have been provided regarding specific safety features (such as balustrades / nets) that are proposed to ensure safety of the students using the upper level open spaces of the building.
- The development area of the site is not constrained in relation to provision of open spaces. There are opportunities to provide for ground level open spaces or proposed

shared open space usage with the other schools within the site. The two existing sports fields to the south of the site can also be utilised for organised sporting activities during a school week. You are requested to address the above concerns and explore opportunities for usage of ground level open space within the site or co-locate open spaces with the two other schools within the site to complement the open spaces designed within the building.

- The open spaces in their current form are not supported unless additional ground level opportunities are exhaustively explored and designed.

2. Traffic and Transport

- The Department has similar concerns that are raised in Council and Transport for NSW's submissions. The concern raised in the public authority comments are required to be addressed.
- It is unclear how the multi-storey car park on the site (proposed as part of a separate application) would be linked to the proposed development area via pedestrian safety/paths/linkages. In this regard, the Department is concerned about its operational adequacy in relation to the proposed development, being on the other side of the site.
- If the proposed development intends to use the multi-storey car park in the future, please indicate how the car park would function in relation to the proposed development and be used by the community during out of hours. In this regard, copies of any legal agreements for access through the other schools or alternative routes, usage hours etc should be provided to demonstrate that the car park can be legally utilised by the users of this school.
- A detailed plan is to be provided on the allocation of car parking spaces for each of the use (primary school, high schools, early learning centre, church).
- It is unclear where the pick-up/drop-off zones would be for the early learning centre. An assessment of pick-up/drop-off zones for the proposed early learning centre is to be provided. Additionally, clarification is to be provided demonstrating the location of pick-up/drop-off zones for the early learning centre on a site plan.
- The submitted EIS states that based on Cycling Aspects of Austroads Guides, the site would require 676 bicycle spaces. However, it is unclear where these spaces are located on the site. Accordingly, details are to be provided on the location of the bicycle locations on the site plan.

- No details of end of trip facilities within the site have been provided. The site plan / floor plans should be amended to include these details.

3. Land use/site planning /site suitability

- The site is part of a broader draft master plan. Details are to be provided to indicate:
 - how the proposed development fits within the draft masterplan.
 - the status and timeline of delivery of the draft masterplan.
- The submitted 'Options Analysis' has not considered any reasons for not redeveloping the site where the existing school is located. Consequently, with respect to site suitability, a greater justification is to be provided for the relocation of the Sacred Heart Primary School from Ralph Street and the proposed new church on subject site. This should be in a form of an additional options analysis for the site / design suitability.

4. Use of church

- The Department notes that the proposed church is only permissible on the site as an ancillary facility to the school. However, the church is proposed to be regularly used on the weekends (per the Noise Assessment Report). In this regard, the following information would be required regarding the use of the church on the site:
 - detailed information of patronage and details of use of the church on the weekends.
 - detailed justification for the weekend use of the church as an ancillary service of the school.
 - additional traffic and noise impacts that may arise due to the weekend use of the church.
 - detailed noise assessment for uses of church (particular before 7am), which has not been included in the current noise assessment.

5. Community use of the site

- The application includes an Out of School Hours (OOSH). It also includes out of hours use of the school buildings/grounds by the community. Accordingly, a detailed schedule of the following would be needed:
 - list of all school facilities to be used (i.e. meeting rooms, parking spaces, halls, etc).
 - types of functions/activities carried out.
 - maximum occupancy and hours/days of operations of such uses.
 - likely frequency of community uses within the site.
 - Number of students within the OOSH.
 - any additional noise and traffic assessment in relation to out of hours community use of school facilities.

ATTACHMENT 2 – OTHER ISSUES

1. Landscaping/tree removal

- The application involves the removal of number of trees along the Darcy Road frontage. Further justification is to be provided for the removal of these trees.
- Alternative methods to retain the trees along the periphery of the site should be explored prior to proposing removal of the existing tree canopy.
- A plan of deep soil planting is to be provided to demonstrate the proposed planting within the levels of the primary school building would be feasible.
- A detailed calculation of the proposed tree canopy on the site must be submitted for assessment.

2. Wind Impact Assessment

- A wind impact assessment including human and pedestrian comfort criteria for the proposed development is to be submitted. The wind assessment should include consideration of the rooftop play areas.

3. Shadow diagrams

- Hourly elevational shadow diagrams are to be provided for the proposed development during the winter solstice to assess the impacts of the primary school building on the façade of the childcare centre / administrative building.

4. Plans

- The Submitted architectural plans do not clearly differentiate which parts of the ground floor of the primary school is covered and are within the building envelope. Therefore, revised architectural plans are to be submitted to clarify this.
- The revised plans must include the outline of the roof over each floor to identify the covered open space area on each level.

5. Photomontage

- Photomontage of the proposed buildings in relation to the existing buildings on site, (preferably from various angles to cover all the buildings on site) should be submitted so that the relationship of the proposed development and the existing developments on the site can be assessed in detail.