

WESTMEAD CATHOLIC COMMUNITY EDUCATION CAMPUS APPENDIX A - RESPONSE TO SUBMISSIONS AND REQUEST FOR ADDITIONAL INFORMATION AND CLARIFICATIONS

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Agency Submissions				
1	Department of Planning, Industry and Environment (DPIE) (Industry)	Comment	Crown Lands has no comments for this proposal as no Crown land is affected.	Noted.
2	Department of Planning, Industry and Environment (DPIE)	RFI	<p><u>Built Form and Open Space</u> 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.</p>	<p>A detailed response to the Department's comments regarding the design and quantity of open space is provided in the covering Response to Submissions Report.</p> <p>The proposed design represents an innovative and modern approach to the provision of open space. Even though the site is reasonably unconstrained, and more ground level open space could feasibly be accommodated, the proposed design represents the best open space outcome for the school, as supported by independent research and CEDP's learning pedagogy.</p> <p>The open space design is also consistent with the approach that was supported by the Department in its recent assessment of SSD-9772 for Santa Sophia Catholic College (SSD-9772), as approved by the Independent Planning Commission.</p> <p>In summary, the open space design:</p> <ul style="list-style-type: none"> • Comprises purposefully designed, age appropriate spaces that are inclusive, and cater for students of both genders and all ages. In this regard, whilst the ground level play space will be accessible by all students, it will primarily be used for play and outdoor learning by years K-2 to provide a separate space for younger, more vulnerable children. • Provides open space areas adjacent to learning areas, which encourages use of the space, enhances supervision and encourages engagement between staff and students. It also takes pressure off vertical and horizontal movements during the day and reduces time spent walking from place to place so that there is more time for students to exercise, socialise, explore and learn. • Provides open spaces, which in conjunction with neighbouring learning areas, will enable teachers to be flexible and agile in their grouping and organisation of students. The size of the rooms means that multiple classes can also be grouped together for different activities and the indoor/outdoor flow will enable varied activities. • Is accessible in all weather conditions, so children never spend recess and lunch indoors on hot, wet or windy days. • Provides activated spaces with a range of equipment and materials which encourage greater physical activity from a greater number of students when compared to traditional open play space, by providing spaces for unstructured and free play, to encourage creativity, chance encounter and exploration among the students.

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				<ul style="list-style-type: none"> Comprises multi-use spaces which can be used for outdoor learning as well as play and circulation, offering better opportunities for supervision. Provides an open play area at Level 5 which focuses on the importance of fitness and exercise, with multi-sport court facilities, open synthetic turf areas for play and amenity, and a running track for sporting and recreational uses to allow for a range of students and sports to utilise the rooftop space at any given time. <p>In addition to the significant quantity of highly functional play space within the building, students will continue to have access to a large amount of ground level open space, including access to the existing ovals in the south of the site. Together, it is considered that the type and quantity of open space provided for the proposed development is more than adequate to meet the education and recreation needs of students.</p>
3			<p>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.</p>	<p>A Solar and Access Daylight Analysis has been prepared by Erbas Sustain (Appendix O). The design of the building seeks to achieve a balance between providing shade for comfort and sun protection in Summer, and solar access for warmth and light in Winter.</p> <p>With respect to solar access, the analysis finds that:</p> <ul style="list-style-type: none"> All outdoor play areas at Ground, Levels 1 - 5 received ≥ 3 hours of direct solar access on the Winter Solstice. On the Summer Solstice, all outdoor play areas at Ground and Levels 1 - 4 are generally well-shaded from direct solar access, with coverage ranging from 55% to 100%. While most of Level 5 is unshaded, parts of the Level 5 outdoor play area remain shaded on the Summer Solstice for sun protection. <p>With respect to daylight, the design has been benchmarked against various Councils' lighting policies and AS1158.3.1:2005 Lighting for Roads & Public Spaces. The National Construction Code on natural lighting and AS1680.2 are intended for interior spaces rather than outdoor areas, and so have not been used as a benchmark in this instance.</p> <p>The design aims to achieve at least 50 lux without lighting (as required under the Standards, and to be supplemented with artificial lighting) to most of the main outdoor play area at Ground Level, Level 3 and Level 5, and at least 21 lux to the passive/secondary play areas Level 1, Level 2 and Level 4. For reference, 50 lux is a desirable lux indicated in AS2560.2.3-2007 for sports field recreation and physical training. 21 lux is considered a mid-range lux and the highest level of illuminance for public activity areas as indicated in AS1158.3.1:2005.</p> <p>The analysis finds that, on average, 72% -89% of the outdoor play areas achieve an annual average of > 50 lux during the indicative operational hours (8:00am –6:00pm) throughout the year. Overall, daylighting to an average of at least 80% of the outdoor play areas is sufficient for the level of activities equivalent to a public playground. Where required, artificial lighting will be used to complement natural lighting for visual comfort.</p>

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4			<p>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.</p>	<p>Based on these findings, the proposal is considered suitable from a daylight and solar access perspective.</p> <p>A detailed response to the Department's open space comments is provided in the covering Response to Submissions Report.</p> <p>The revised Architectural Drawings (Appendix B) quantify the open space within the building. The diagrams show that there will be over 7,800m² of open space across Levels 1 – 5 (i.e. all ground level play space, including the ground level undercroft, is in addition to this). This equates to 4.6m² per student, within the building. The plans outline that the open space has been specifically located so that the relevant open space for each age group is within one floor of the learning areas. This ensures that each year group will have direct access during mid-morning and lunch breaks, with no wasted time travelling to access these open spaces.</p> <p>On ground level, there is an additional 6,070m² of open space. This includes the undercroft and outdoor area adjacent to the new Primary School Building, but excludes the ovals. This additional area equates to 3.6m² of additional open space per student, taking the total open space provision to 8.2m² per student. A summary of these figures is provided below.</p> <table border="1" data-bbox="1088 772 1301 1059"> <thead> <tr> <th colspan="2">OPEN SPACE CALCULATIONS</th> </tr> </thead> <tbody> <tr> <td>Ground Floor</td> <td>6070.8 m²</td> </tr> <tr> <td>Level 01</td> <td>742.6 m²</td> </tr> <tr> <td>Level 02</td> <td>755.2 m²</td> </tr> <tr> <td>Level 03</td> <td>2804.8 m²</td> </tr> <tr> <td>Level 04</td> <td>786.7 m²</td> </tr> <tr> <td>Level 05</td> <td>2777.3 m²</td> </tr> <tr> <td>Not Placed</td> <td>Not Placed</td> </tr> <tr> <td></td> <td>13937.4 m²</td> </tr> </tbody> </table> <p>Open Space Ratio 8.23 m²/student</p> <p>For clarity, the primary children will access the ovals for delivery of the PDHPE curriculum but they are not included in the play space calculation. More broadly, at the completion of the Master Plan, there will be more play space area per student than recommended by the EFSG. Preliminary figures indicate that the total area per student will be approximately 20% greater than the EFSG at the completion of Project 1, Stage 2 (refer to details of Master Plan below).</p>	OPEN SPACE CALCULATIONS		Ground Floor	6070.8 m ²	Level 01	742.6 m ²	Level 02	755.2 m ²	Level 03	2804.8 m ²	Level 04	786.7 m ²	Level 05	2777.3 m ²	Not Placed	Not Placed		13937.4 m ²
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5			<p>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.</p>	<p>All spaces are used as multi-purpose spaces – circulation spaces will be used for access, play and learning. It is also noted that peak play times and circulation times are different, and so it is appropriate for circulation areas to be considered as part of the open space calculation.</p>																		


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6			<p>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.</p>	<p>Notwithstanding, areas which are only used to access classrooms (i.e. they do not have a multi-use function) have been excluded from the open space area calculations at Appendix B.</p> <p>In a primary school environment, it is common practice for external play areas to be in proximity to learning spaces. In this instance, the immediate adjacency of play space to learning areas is part of the purposeful design outcome to allow better supervision, multi-use and less time being spent walking from place to place, both vertically and horizontally.</p> <p>However, it is noted that all primary students will have recess and lunch breaks at the same time, as so there will be no adverse acoustic impacts on student learning during these times.</p> <p>Whilst the PDHPE curriculum will be supported by the ovals, the internal open spaces will be used when required due to adverse weather and in consideration of travel times for smaller children. These activities would likely take place at Ground Level and on Level 5, however may also take place at Level 3. In these instances, activities will be managed to ensure that there are no adverse acoustic impacts.</p> <p>Acoustic insulation between floors will be designed to comply with <i>AS/NZS 2107:2016 Acoustics - Recommended design sound levels and reverberation times for building interiors</i> and CEDP's acoustic performance requirements.</p>
7			<p>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.</p>	<p>The covered area is double height, has an area of approximately 1,800m² and has no walls. The space is usable in all weather and his considered highly suitable for a handball court.</p>
8			<p>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</p>	<p>The Architectural Drawings have been updated to include details of the proposed netting and balustrades at Levels 3 and 5 (refer to Appendix B).</p>
9			<p>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.</p>	<p>A detailed response to the Department's open space comments is provided in the covering Response to Submissions Report.</p> <p>It is noted that all students, including the primary school students, will have access to ovals. Parts of the PDHPE curriculum will also be delivered on the ovals. As shown in the Master Plan images below (Figure 2), a significant area of open space will continue to be provided in the southern part of the site as part of the long-term Master Plan.</p>

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10			The open spaces in their current form are not supported unless additional ground level opportunities are exhaustively explored and designed.	<p>A detailed response to the Department's open space comments is provided in the covering Response to Submissions Report.</p> <p>Overall, the proposed open space design represents an innovative and modern approach to the provision of open space, which aligns with CEDP's learning pedagogy and is supported by independent research. It provides a superior learning and play outcome than traditional ground level open space.</p> <p>Notwithstanding, at the completion of the Master Plan, students will still have access to significant areas of ground level open space including the area to the west of the Primary School Building (where the at-grade car park is currently located) and on the ovals in the south of the site.</p>
11			<p><u>Traffic and Transport</u> 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.</p>	Noted. A response to TfNSW's comments is provided below.
12			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.	<p>As shown in the Car Parking Allocation Plan at Appendix B, the new Primary School Building and CELC will use the existing and proposed car parks in the western part of the campus for parking, as well as pick-up and drop-off activities.</p> <p>The multi-storey car park (subject to separate DA) in the north-eastern corner of the site will be used by high school staff and high school visitors, as well as for high school pick-up and drop-off.</p> <p>Whilst a small number of primary school staff will park in the multi-deck car park, there will be no need for primary or CELC students or visitors to cross the campus to access the new multi-storey car park, eliminating concerns around pedestrian safety and linkages.</p> <p>Further information around car parking allocations, as well as pick-up and drop-off, is provided in the Traffic and Transport Response to Submissions Report at Appendix C.</p>
13			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.	<p>The proposed car park will not be available for public or commercial use. It will be used solely by the schools, the Parish Church and any associated community uses on the site.</p> <p>As all four schools are operated by CEDP, there is no need to enter into any legal agreements regarding use of the car parks or access across the campus.</p>
14			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).	The Architectural Drawings (Appendix B) and Traffic and Transport Response to Submissions Report (Appendix C) have been updated to include a breakdown of parking spaces for each use.

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15			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.	<p>The Traffic and Transport Response to Submissions Report (Appendix C) has been updated to provide additional detail about pick-up and drop-off for CELC students.</p> <p>Given the young age of children attending the CELC, parents would park in the western car park (adjacent to the CELC) and walk their child into the centre.</p> <p>Parents dropping-off and picking-up children attending the CELC would utilise the visitor/ parent parking spaces located within the 45-degree angle parking of the at-grade car park. These parking spaces are located in close proximity to the CELC. CELC peak periods occur before and after peak school parking periods (i.e. before 7am and after 4pm). Therefore, there would be no double-up of parking demand of CELC parents with school visitors/parents.</p>
16			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.	<p>The submitted Traffic Impact Assessment determined that the site should progressively provide 209 bicycle spaces in order to meet the cycling demands of the proposal, whilst also having consideration for a 3-5% mode shift towards cycling amongst students and staff. The Parking Allocations and Site Circulation Plan at Appendix B shows the location of the 209 spaces on the campus. Of the future 209 bike parks, 194 are new. There are currently 15 bike spaces on site - 8 for Catherine McAuley and 7 for Parramatta Marist. Therefore, 209 (future) minus 15 (existing) equates to 194 (new) bike spaces being provided as part of the proposal. Of the 209 spaces, 93 are dedicated to primary students and primary staff, the remaining are for secondary students and staff. The proposal includes the additional 101 (209 – 93 (primary) – 15 (existing)) secondary spaces to support the green travel plan and mode share target of 10% that is being advocated across the whole site (including the high schools/existing population) to alleviate traffic in order to support the primary school proposal.</p> <p>Bicycle parking provision according to the Cycling Aspects of Austroads Guides was reviewed in the Assessment. However, the provision of 676 bicycle spaces as per the Guides was considered to be an oversupply for this site. Therefore, bicycle parking spaces should be progressively provided to reach 209 bicycle spaces as outlined at Table 2 of the Traffic and Transport Response to Submissions Report (Appendix C). The location of the bicycle racks is shown on the revised Site Plan at Appendix B.</p>
17			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.	<p>Parramatta DCP 2011 does not provide specific requirements for end of trip facilities. As a result, City of Sydney's DCP requirements for end of trip facilities have been applied. As children will not be using shower facilities only staff facilities are being provided.</p> <p>Applying City of Sydney's rates, the proposal would be required to provide one (1) shower for primary school staff. This is proposed as an accessible shower and change room within the administration building, as shown on the revised Site Plan at Appendix B. Primary school staff bicycle parking is provided in proximity of the shower. Lockers will be provided for use by staff who cycle within the staff room area, while bicycle racks would be located as shown on the revised Site Plan at Appendix B.</p>
18			<u>Land use/site planning /site suitability</u> The site is part of a broader draft master plan. Details are to be provided to indicate:	In recognition of the site's strategic location and CEDP's innovative learning pedagogy, CEDP has been reviewing options for the development of the site, and has developed a Master Plan which highlights the opportunity for the redevelopment of the schools, with surplus land around the periphery of the site to be redeveloped to accommodate a range of complementary uses that would align with the

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			<ul style="list-style-type: none"> • how the proposed development fits within the draft masterplan. • the status and timeline of delivery of the draft masterplan. 	<p>strategic intent of the precinct. The Master Plan for the site has been supported by the State Design Review Panel.</p> <p>It is acknowledged that the development of these complementary uses will be subject to a separate planning process, however it would ultimately see the site development into a truly mixed-use education precinct that aligns with the site's location in the Westmead Health and Education Precinct and recently approved neighbouring developments to the east.</p> <p>The proposed SSD represents the first stage of the Master Plan redevelopment (referred to as Project 1, Stage 1). At the request of the State Design Review Panel, the Master Plan was further developed to demonstrate how the proposal sits within the overarching strategy for the redevelopment of the site.</p> <p>Five key principles which have informed the project vision, including:</p> <ol style="list-style-type: none"> 1. One Church and Mission 2. Learning Drives Design 3. Diversity of Play Areas 4. Inclusion of School within the Westmead Innovation Precinct 5. Social, Ecological and Financial Sustainability. <p>These principles have led to the development of seven key design moves (refer to Figure 1) which have informed the development of the Master Plan.</p>

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				<div data-bbox="1088 268 2063 853"> </div> <p data-bbox="1088 869 1480 919">Figure 1 Key Master Plan design moves Source: Ethos Urban</p> <p data-bbox="1088 949 2051 973">A range of matters have considered at a Master Plan level. These include, but are not limited to:</p> <ul data-bbox="1088 976 1756 1197" style="list-style-type: none"> • Landscaping, open space character and tree retention; • Pedestrian and cyclist way finding; • Accessibility; • Boundary and access strategy; • Building placement in response to landscape and topography; • Water management; • Sustainability; and • Design principles for the future complementary uses. <p data-bbox="1088 1225 2096 1249">The resulting Master Plan is shown at Figure 2. It will be delivered in three main stages, comprising:</p> <ol data-bbox="1088 1252 2107 1412" style="list-style-type: none"> 1. Project 1, Stage 1. Subject of the current SSD DA. 2. Project 1, Stage 2. Construction of integrated high school buildings in the centre of the site, surrounded by an internal road network, including a new east-west connection. Indicatively, this will occur between 2025-2028. 3. Project 2, Stage 1. Construction of the complementary uses surrounding the schools in the north along Darcy Road, in the east bordering the Western Sydney University site, and in the south of

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				<p>the site boarding the train line. Timing of Project 2, Stage 1 is unknown, however will likely be from 2028 onwards.</p>  <p>Figure 2 Future Master Plan, including new north-south and east-west connections <i>Source: Alleanza Architecture</i></p>
19			<p>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.</p>	<p>The Master Plan, which has been summarised above, provides details of the design principles and key moves which have resulted in the proposed design.</p> <p>Central to this is the urgent need to relocate Sacred Heart Primary School from Ralph Street. As noted in the submitted EIS, the playground used by Sacred Heart Primary School is on leased land, and the lease is due to expire in February 2021. Once this open space is excluded, the site is small and heavily constrained, and any redevelopment would not offer opportunities for future growth. Further, the site is located in a low-density residential area, and any intensification of the use would likely have significant adverse impacts on surrounding residents in terms of visual impacts, overshadowing and noise, as well as traffic and parking.</p> <p>Conversely, relocating Sacred Heart Primary School and the Parish Church to the WCC site is consistent with the Master Plan principles, as well as the strategic intent of the Westmead Health and Education Precinct. In summary:</p>

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				<ul style="list-style-type: none"> Relocating the church is central to the WCC redevelopment, giving the parish and its services more prominence for the school and wider community; Collocating primary and secondary students is aligned with CEDP's learning pedagogy and their Pre-School to Post School Learning Framework; and The WCC site is a large site and forms part of the broader Westmead Health and Education Precinct. There will be no adverse amenity impacts on surrounding residents as a result of the proposal and it is consistent with the strategic intent of the Precinct. Further, the proposal will offer significant benefits to the broader community by providing primary school capacity in an area of identified growth, with Council's LSPS noting that there will be 4,400 new dwellings in the Westmead precinct by 2036. <p>Whilst CEDP notes the Councillors comments, the redevelopment of the Ralph Street site (which is located in the Cumberland LGA) is clearly unfeasible, and there are significant benefits in collocating the Sacred Heart Primary School at the WCC.</p>
20			<p><u>Use of Church</u> 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:</p> <ul style="list-style-type: none"> 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. 	<p>In response to these comments, additional information has been provided regarding the use of the Sacred Heart Parish Church by both the schools and the wider parish community.</p> <p>As detailed in the covering Response to Submissions Report, for the majority of the time, the church will be used for the purposes of hosting church services, classes, events and meetings for children attending the adjoining Catholic schools, as well as school teachers and the families of children attending the school.</p> <p>Use of the church by the broader parish community, including on weekends, is secondary to the use of the church by the schools and the church use is therefore ancillary to the education use.</p> <p>Notwithstanding, and as acknowledged by Council in their submission, in the event that the Department forms the view that the Parish Church is not considered 'development that is ordinarily incidental or ancillary to' the educational establishment, the SSD can reply on Section 4.38(2) of the EP&A Act to enable assessment and approval of the application.</p>
21			<p><u>Community use of the site</u> 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:</p> <ul style="list-style-type: none"> 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. 	<p>The OOSH facility will have capacity for up to 800 students. This represents 48% of the proposed 1,680 primary student population. CEDP anticipates that the daily number of students at the OOSH facility will range between 40% and 48% of the primary school population.</p> <p>Currently, the parish hall (which will be the large meeting room in the new Parish Church) is used by various community groups for activities such as Taekwondo, ballet, cultural groups (preparing and practicing for festival events) and social gatherings such as birthday parties.</p> <p>An Indicative Schedule of Community Use has been prepared for the new Parish Church and is provided at Appendix R. These types of activities will continue to occur in the new Parish Church, and potentially in other external areas of the school, such as the outdoor Parish Contemplation Space. Most of these activities occur weekly or bi-weekly during school terms, outside of school hours. Hours</p>

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			<ul style="list-style-type: none"> any additional noise and traffic assessment in relation to out of hours community use of school facilities. 	<p>of operation are anticipated to be between 6:00pm – 10:00pm on weekdays. Weekend usage times are to be determined but could be expected to be within 6:00am – 10:00pm. The Schedule identifies some use of the Parish by the community during the school day, however this will only occur when the Parish is not required by the schools.</p> <p>As a result, there would be ample parking available on the campus to accommodate these uses. Given the nature of the likely uses and the context of the site, they would not result in any adverse environmental impacts with respect to noise, traffic and access.</p> <p>A key principle of the site Master Plan is to open-up the site to assist the local community by providing additional open space and facilities beyond what is currently available in the area. In meetings with Council, Council has requested access to the school site for community uses such as sport. CEDP is willing to continue working with Council to determine what facilities would be most beneficial to Council and the community. It is noted that areas of the school, including the parish and ground level open spaces, will be available to the public.</p>
22			<p><u>Landscaping/tree removal</u> 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.</p>	<p>A detailed response to tree removal has been provided in the covering Response to Submissions Report. In summary, the tree removal along Darcy Road is required to create a cohesive, welcoming street frontage that opens the Parish facilities up to the public realm. This is one of the key principles of the site Master Plan.</p> <p>The State Design Review Panel supported the creation of a more welcoming gateway into the site, expressing support for <i>“the orientation of the parish church and the treatment along Darcy Road, which is now open and welcomes pedestrians onto the site.”</i></p> <p>Further, none of the trees have ecological significance, they have all been recently planted and their removal will be offset by significant new canopy and understory planting. This includes approximately twenty-five (25) new trees as part of this stage.</p>
23			<p>Alternative methods to retain the trees along the periphery of the site should be explored prior to proposing removal of the existing tree canopy.</p>	<p>Refer to response above and in the covering Response to Submissions Report.</p> <p>Existing trees have been retained where it’s feasible to do so. This includes the retention of 4 additional trees to the west of the existing tennis courts, which were previously identified for removal. However, in order to achieve a welcoming gateway into the site, the existing retaining wall and setback planting need to be removed.</p> <p>The loss of trees will be offset by significant additional canopy and understory planting. This includes approximately twenty-five (25) new trees in the area. As noted below, there will be a total tree canopy coverage of 4,685m² within the site of the proposed works (4,508m² proposed and 207m² existing). This equates to 25% of the development site area.</p>
24			<p>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.</p>	<p>Ground Ink has prepared a plan to show soil depths at Level 5 (roof level) of the proposed building (refer to Appendix F).</p>

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25			A detailed calculation of the proposed tree canopy on the site must be submitted for assessment.	<p>The plan shows several areas of deep soil planting at roof level, which have soil depths of up to 1,500mm. These areas will be capable of accommodating tree planting, including large shade trees.</p> <p>A Tree Canopy Coverage Plan has been prepared by Ground Ink and is included at Appendix F.</p> <p>The Plan shows that within the site of the proposed works, there will be a total tree canopy coverage of 4,685m² (4,508m² proposed and 207m² existing). This equates to 25% of the development site area and balances the need to provide adequate tree coverage, whilst also providing a safe and usable outdoor space for students and the community.</p>
26			<p><u>Wind Impact Assessment</u> 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.</p>	<p>The submitted Wind Assessment has been updated to address the Department's comments (refer to Appendix H).</p> <p>With respect to conditions at roof level, the pedestrian comfort category under the Lawson criteria is likely to be pedestrian standing or walking. At this elevation, parts of the space will be reasonably exposed to strong prevailing winds from most directions. Depending on the wind direction, calmer conditions would be available in locations protected by the stair and plant wall structures. The central area under the shade structure is partially enclosed by louvres and the plant room, and relatively calm conditions would be expected there. This area would be most suited for longer-term stationary occupation.</p> <p>In general, the following measures may be considered if a calmer wind environment more suited to stationary activity, seating, dining, and the like is required for the rooftop:</p> <ul style="list-style-type: none"> • Addition of landscaped areas incorporating dense foliage - in addition to the larger trees indicated, lower-level planting such as shrubs and hedges may be effective in mitigating strong winds. This may be effective at the building perimeter and/or distribute across the space. • Screening elements, similar to the louvred screens proposed elsewhere or solid screens, to seating areas. • High (>1.5 m) perimeter balustrades. An effective approach may consider a mix of solid balustrade and porous media such as landscaping or porous screening at the roof edges. <p>As the required mitigation depends on the intended use of the space and desired wind environment, these measures are not considered prescriptive, but rather guidance for improving conditions as required.</p> <p>As the roof top space is intended for active play rather than stationary activities, CEDP does not intend on implementing any of these measures at this stage.</p>
27			<p><u>Shadow diagrams</u> 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.</p>	<p>Additional Shadow Diagrams have been prepared and are provided at Appendix B.</p> <p>The diagrams show that on the winter solstice, shadow impacts will be unchanged in the morning period. After midday, the proposed building will cause additional overshadowing of the CELC building.</p>

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				On the equinox, shadow impacts are largely unchanged until approximately 1pm. After 1pm, the proposed building will cause additional overshadowing of the CELC building. Whilst there be some additional overshadowing, this will not have a significant impact on the use of the existing building.
28			<u>Plans</u> 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.	This detail is shown on the revised Architectural Drawings at Appendix B .
29			The revised plans must include the outline of the roof over each floor to identify the covered open space area on each level.	This detail is shown on the revised Architectural Drawings at Appendix B .
30			<u>Photomontage</u> 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.	Additional photomontages have been provided at Appendix I .
31	DPIE – Environment, Energy and Science Group (EES)	Comments	<u>Aboriginal Cultural Heritage Assessment Report</u> EES notes that an ACHAR has been submitted and prepared by Comber Consultants dated February 2020, and EES recommends that should an approval be granted that any recommendations within the ACHAR form part of conditions of consent.	Noted.
32			<u>Biodiversity</u> A Biodiversity Development Assessment Report (BDAR Waiver) was approved on 19 November 2019.	Noted.
33			<u>Flooding</u> EES has no further flooding comments based on the information provided in NOTHROP report dated 3 March 2020.	Noted.
34			<u>Riparian Land</u> EES recommends that should the proposal be approved the following form a condition of consent: <ul style="list-style-type: none"> A landscaping Plan be submitted indicating any proposed planting in the riparian corridor should 	Noted.

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35			<p>consist of a diversity of local native provenance species (trees, shrubs and groundcover species) from the relevant native vegetation community that occurs along the corridor.</p> <p><u>Urban Tree Canopy and Landscaping</u> EES recommends that should the proposal be approved the following form a condition of consent;</p> <ul style="list-style-type: none"> • A Landscaping Strategy be prepared that <ul style="list-style-type: none"> • identifies any trees and other vegetation to be removed or retained on site • includes details on the native vegetation community (or communities) and native plant species that once occurred in this location • specifies that any landscaping will use a diversity of local provenance native species trees, shrubs and groundcovers) from the native vegetation community (or communities) that once occurred on the site to improve biodiversity • includes a list of local native provenance species (trees, shrubs and groundcovers) to be used in the site landscaping • uses a diversity of advanced size local native trees preferably with a plant container pot size of 100-200 litres, or greater in the landscape areas • provides enough area/space to allow any planted trees to grow to maturity on the site and • any trees proposed to be removed should be replaced at ratio of greater than 1:1 to assist improve the urban tree canopy and to mitigate the urban heat island effect including a maintenance regime for landscaping for a period of 12 months including the replacement of any plants lost during this time. 	Noted.
36	Cumberland Council	Comments	No Comments as this application does not fall under Cumberland LGA	Noted.

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37	City of Parramatta	Objects	<p><u>Traffic</u> The State Significant Application includes traffic modelling for 11 intersections in the area. Of these, the intersection of Darcy Road and the Primary School Driveway is the most effected by the proposed development. The proposed development also has a significant effect on the intersection of Darcy Road and Bridge Road. The traffic from the development that is of most concern is that associated with the pickup and set down from the primary school as it has a high volume and is concentrated in a short period.</p>	<p>A detailed response to Council's concerns around intersection performance is provided in the covering Response to Submissions Report and in the Traffic and Transport Response to Submissions Report prepared by TTPP at Appendix C.</p> <p>In summary, the submitted TIA did not account for the reduction in trips resulting from the operation of the Out of School Hours (OOSH) facility on the site. Given that the OOSH operates before and after standard school hours, this will result in a significant reduction in trips during school peak periods, as outlined below.</p> <p>The OOSH facility will operate between 6am and 6pm Monday to Friday. The OOSH facility will be provided for parents who are required to drop-off and pick-up students earlier and later than the standard school periods. Therefore, the arrival time of students at the OOSH facility would be earlier than the morning school peak period (i.e. before 7am). Similarly, the departure time for OOSH students would be later than the afternoon school peak period (i.e. after 4pm).</p> <p>The OOSH facility will have capacity for 800 students. This represents 48% of the proposed 1,680 primary student population. CEDP anticipates that the daily number of students at the OOSH facility will range between 40% and 48% of the primary school population.</p> <p>Based on the above OOSH accommodation rates, there would be a significant reduction in the number of car trips during the school peak periods. This is the result of less parents transporting students to the primary school during the peak times as they will be attending the OOSH facility.</p> <p>Revised SIDRA modelling has been carried out to reflect the operation of the OOSH. The revised modelling shows that the OOSH will significantly improve the performance of the existing site access at Darcy Road. It will also result in further improvements at the nearby intersections of Darcy Road – Institute Road – Mons Road and Darcy Road – Bridge Road – Coles Car Park. At some intersections, including Darcy Rd – Site Access (Catherine McAuley) – Westmead Hospital and Hawkesbury Rd – Railway Parade, there would be an increase in average delay by a few seconds which is the result of the traffic modelling software optimising the signal phase timing across all movements at the junction.</p> <p>Further to this, a Framework Travel Plan has been prepared by Frank Turquoise Group to set out CEDP's process to manage travel demand at the WCC (Appendix D). The measures outlined in the Plan will help reduce the number of car trips during the school peak periods. The submitted TIA assessed a 10% modal shift away from car usage, which will have further benefits to the local road network operation and performance.</p> <p>Finally, it is noted that all future cases which were modelled as part of the TIA presented conservative scenarios, having consideration for background traffic growth within the local road network. It is not yet known what traffic rate reduction transport initiatives such as the Parramatta Light Rail, Sydney Metro West, and improved bus services will have on the Westmead locality. Furthermore, it will not be known until the first few years of these major infrastructure projects being operational.</p>

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				<p>Notwithstanding, these major transport infrastructure projects are predicted to remove tens of thousands of cars off Sydney roads every day. For example, the Sydney Metro West EIS forecasts that there will be 83,000 fewer car trips every weekday by 2036. It is expected that the Westmead precinct would experience a reduction in traffic loads once these key transport infrastructure projects become operational. Such benefits would begin to become apparent in 2023 once Parramatta Light Rail opens, which is also the opening year of the proposed development. Furthermore, growth in the Westmead precinct is forecast to bring 4,400 new dwellings into the area which will also increase the number of walking, cycling and public transport trips within the Westmead precinct as well as to/from the Westmead precinct.</p> <p>When these major transport projects are viewed together with the reduction in peak hour trips resulting from the operation of the OOSH and the implementation of the Framework Travel Plan, it is considered that the proposed development will have an acceptable level of impact on the local road network.</p>
38			The level of service at the Primary School Site access will be F during the AM and PM peak after construction of the development. This will lead to queuing beyond the right and left turn bays into the site, which will disrupt traffic flow not associated with the school, which is unacceptable given the role of the medical and health services role of the Westmead precinct.	A detailed response to Council's concerns around intersection performance is provided in the covering Response to Submissions Report, and above in relation to Item 37.
39			The State Significant Application also fails to provide information on how pedestrians crossing the primary school driveway at Darcy Road will be managed.	<p>Pedestrian access to and from the school will be provided via a new pathway along the western side of the entry road, and a children's crossing within the site. This will provide connectivity for pedestrians travelling to and from the site from the west, and will eliminate the need for children to cross at Darcy Road. The children's crossing will be managed during school peak periods by a member of staff or a school crossing supervisor. Transport for NSW will be consulted to determine the appropriate personnel for managing the crossing.</p> <p>The existing pedestrian refuge at the site's Darcy Road entry will remain in place, in order to facilitate pedestrians walking along the public footpath and crossing the site driveway on Darcy Road.</p>
40			Similarly, the intersection of Bridge Road and Darcy Road deteriorates from a Level of Service (LoS) C to a (LoS) F in the AM and PM peak as a result of the proposed development.	A detailed response to Council's concerns around intersection performance is provided in the covering Response to Submissions Report, and above in relation to Item 37.
41			The impacts of the level of service at these intersections is considered to be unacceptable. The scheme needs to be amended to address these significant impacts.	A detailed response to Council's concerns around intersection performance is provided in the covering Response to Submissions Report, and above in relation to Item 37.
42			The draft Westmead Innovation District Masterplan includes a link from the Primary School Car Park direct to Bridge Road. This link would alleviate traffic flows at the two problem locations detailed above. Note that the link	A detailed response to Council's concerns around connectivity is provided in the covering Response to Submissions Report and elsewhere in this response, including Item 53 below.

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43			<p>in the draft plan continues through the school site, which whilst not necessary from a traffic perspective helps to address concerns in relation to connectivity raised above.</p> <p>An additional measure that could be undertaken would be to reduce the number of students at the primary school.</p>	<p>This is not a viable option. There is significant demand for primary school enrolments in the area, which is only expected to increase as the Westmead precinct grows Council's Local Strategic Planning Statement (LSPS) states that growth in the area is forecast to bring 4,400 new dwellings to the Westmead precinct by 2036.</p> <p>As outlined at Section 1.2 of the submitted EIS. The site sits within the Westmead Health and Education Precinct, which is the largest health and education precinct in Greater Sydney. The location of the Westmead Catholic Community presents a unique opportunity to collaborate with existing institutions as the precinct is developed. The Central City District Plan outlines that growth in the Westmead precinct is a priority.</p> <p>To support this predicted growth, additional infrastructure, such as improved schools, will be required to service the growing worker and resident population. Specifically, demographic modelling undertaken by DPIE shows that the number of school-aged children is projected to increase over the next 20 years. In the Central City District, an extra 89,360 students will need to be accommodated in both government and non-government schools by 2036. 32% of this predicted growth in school students is predicted to occur in Parramatta, whilst 34% of the anticipated growth of children four years and younger in the Central City District will also occur in Parramatta. Council's LSPS forecasts an additional 30,000 school students in the LGA by 2036.</p> <p>The Central City District Plan identifies that this will require planning early education and school facilities, which should encourage innovative approaches to the use of land and floor-space, including co-locating with compatible uses such as primary schools and office buildings, and close to transport facilities.</p> <p>The WCC project is ideally situated to assist in supporting this demand. and allied health services. The existing site benefits from a high level of accessibility, close to rail, bus and road connections, as well as the future Parramatta Light Rail and planned Sydney Metro West.</p>
44			<p>There are other intersections that deteriorate in future as a result of this development and other surrounding growth. However, for the other intersections there are other factors that apply. For example, the intersection of Hawkesbury Road and Alexandra Parade will be modified as part of West Metro. For other intersections the school traffic has a relatively small affect compared to traffic from other developments.</p>	<p>Noted, the Sydney Metro West EIS has been reviewed for the modified arrangement of the Hawkesbury Road and Alexandra Parade junction.</p> <p>It is noted that traffic modelling carried out as part of the Sydney Metro West EIS includes the road network immediately surrounding the Sydney Metro West site which is concentrated to the south of the rail line. Conversely, the WCC project modelling is focused on the intersections surrounding the Darcy Road site, that is, north and west of the rail line.</p> <p>Whilst there is minimal overlap of the modelling junctions undertaken as part of the WCC project and Sydney Metro West EIS, modifications to the junction of Hawkesbury Road-Alexandra Parade shall be</p>

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45			<p>There is no calculation provided to detail how these numbers of cars picking up or dropping of in the 15 minute period is determined. The calculation of capacity (233 vehicles in 15 minutes) is considered to be accurate.</p> <p>However, the TAIA also states the following in regards to the number of Primary School students arriving by car and the number of cars associated with this movement. These figures are considered to be more accurate than those provided above for the demand for spaces.</p> <p>These figures also show that the number of cars for the pickup (606) exceeds the capacity of the pickup and set down area (given above as 233 in 15 minutes). This would result in queuing back on to Darcy Road that would extend beyond the left and right turn bays into the site. Note that there is no proposed management of the pickup and set down. This would mean that the parents would arrive in a very short period, and queue to enter the site. The road effectively would have to store hundreds of vehicles for over half an hour, twice per day. The subsequent queuing will be significantly worse if the proposed development proceeded.</p> <p>The TAIA estimates that the net traffic increase as a result of the proposed development in 2033 is 864 and 925 vehicle trips per hour during AM and PM peak periods respectively</p>	<p>considered in the revised SIDRA network model, with consideration for the OOSH facility at the WCC site.</p> <p>Student travel information has been obtained to understand how students arrive and depart school based on 15-minute intervals. The number of students and proportion of primary school students is presented in response to Submission 14 of the Traffic and Transport Response to Submissions Report at Appendix C. The data indicates that, in the busiest 15-minute period of the school peak hours, the number of car arrivals and departures would have been as reported in Section 6.8 of the submitted Traffic Impact Assessment.</p> <p>Consideration of the OOSH in these figures has reduced number of cars dropping-off and picking-up students in the peak 15-minute period, as shown below.</p> <table border="1"> <thead> <tr> <th rowspan="3">Year</th> <th colspan="2">No OOSH (as presented in TIA)</th> <th colspan="2">40% OOSH</th> <th colspan="2">48% OOSH</th> </tr> <tr> <th>AM (Cars DO)</th> <th>PM (Cars PU)</th> <th>AM (Cars DO)</th> <th>PM (Cars PU)</th> <th>AM (Cars DO)</th> <th>PM (Cars PU)</th> </tr> </thead> <tbody> <tr> <td>2023</td> <td>50</td> <td>76</td> <td>24</td> <td>36</td> <td>18</td> <td>28</td> </tr> <tr> <td>2033</td> <td>128</td> <td>194</td> <td>60</td> <td>91</td> <td>46</td> <td>70</td> </tr> </tbody> </table>	Year	No OOSH (as presented in TIA)		40% OOSH		48% OOSH		AM (Cars DO)	PM (Cars PU)	AM (Cars DO)	PM (Cars PU)	AM (Cars DO)	PM (Cars PU)	2023	50	76	24	36	18	28	2033	128	194	60	91	46	70
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46			<p>Primary Schools that have a large population can function adequately if their catchment is over a small geographic area. This allows a large portion of the students to walk to and from the school. It also helps if there is a permeable road network with lots of route options for motorists to disperse the traffic. The proposed development has neither of these characteristics and is inherently flawed. It is considered that a number of smaller primary schools, dispersed over multiple suburbs would provide a satisfactory arrangement.</p>	<p>A detailed response to Council's concerns around the student population is provided in the covering Response to Submissions Report and elsewhere in this response, including Item 43 above.</p>																											

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47			<p>Control P.2 of Section 5.3.3.5 of the Parramatta DCP 2011 indicates that on-site parking shall be provided at the rate determined by the traffic impact statement having regard to the objectives of this clause. On this basis, the submitted Transport & Accessibility Impact Assessment report, prepared by The Transport Planning Partnership (TTPP) dated 19 March 2020, in support of the proposal estimates that the number of parking spaces required for each group on a weekday.</p> <p>Based on the justifications provided in the TAIA, this parking demand estimation is considered acceptable for the case.</p>	Noted.
48			Given that a new on-site car park with approximately 260 additional car parking spaces is proposed to be constructed off Darcy Road at the north-east corner of the site, the total parking provision would be in the order of 472 spaces which is more than the estimated parking demand for the Stabilisation Year 2033.	Noted.
49			The TAIA states that the schools will progressively provide up to 208 bicycle parking spaces to achieve a modal shift target of 3-5% from private vehicle usage to active transport (i.e. walking and cycling) and public transport. This bicycle parking provision is considered adequate for the proposed development. It is noted that the Parramatta DCP 2011 does not provide bicycle parking rates for educational establishments and places of public worship.	Noted.
50			The TAIA also mentions that suitable public transport strategies should be pursued by preparing and implementing a Green Travel Plan to encourage a modal shift from single-occupant private vehicle trips and influence the way people move to/from a site to deliver better environmental outcomes to encourage sustainable travel and reduce traffic and parking impacts within communities. Although Council supports this suggestion, the Green Travel Plan is unlikely to reduce the primary school pick up and set down enough to address the concerns raised.	<p>A detailed response to Council's concerns is provided in the covering Response to Submissions Report.</p> <p>In response to Council's comments, a Framework Travel Plan has been prepared by Frank Turquoise to set out CEDP's process to manage travel demand at the WCC (Appendix x). The Framework Travel Plan initiatives will be implemented by the school to encourage a 10% modal shift away from car usage and more trips by active travel and public transport. The Travel Plan includes the following measures:</p> <ul style="list-style-type: none"> • Implementation of a Travel Access Guide (TAG), to promote modes which already serve the school and communicates transport expectations with students, parents and staff. The Travel Access Guide: <ul style="list-style-type: none"> - Consolidates all transport policies and transport access information; - Maps active and public transport access for the CEDP community; - Demonstrates site transport infrastructure, including footpaths to bus stops and stations, on-site scooter, bicycle and car parking;

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				<ul style="list-style-type: none"> - Showcases transport offers and benefits negotiated by CEDP for staff and students; - Directs transport feedback to Send Snap Solve or cedp.transport@parra.catholic.edu.au and Council's Cycleways Advisory Committee have links provide bicycle feedback to Mark Crispin, the current council contact for this: mcrispin@cityofparramatta.nsw.gov.au; and - Links parents to Transport for NSW information and resources for gaining a free student public transport pass or discounted public transport pass. • Implementation of a Travel Coordinator shared between the four schools at the site. The Travel Coordinator will use the communications plan to the Westmead Catholic Community transport programs, the TAG and the monitoring strategy to report to CEDP and the school principals regarding participation in the programs and progress on the Framework Travel Plan targets. The Travel Coordinator may also provide a central point of contact to coordinate travel-related initiatives with other Westmead Health and Education Precinct partners. • A Communications Plan. With the TAG documenting transport options, it is possible to shift transport behaviour. The Communications Plan sets out how to communicate the Travel Plan and transport options currently available for staff, students and parents. Communication channels will include the school website "how to get here" page, E-newsletter and school Facebook page and other media channels. The Plan would be communicated to the CEDP community at the start of Term 3 to induce change ahead of the following year, and again in Term 4 2020 and Term 1 2021, prior to construction and during the relocation of the Sacred Heart Primary School. • Monitoring and Evaluation Plan, which will involve: <ul style="list-style-type: none"> - Travel Coordinator Trip Planning Sessions. This will provide personalised trip-planning assistance to staff, students and families who are not easily able to find a transport option that meets their requirements; - Launch of the TAG, and recording the number of document clicks from the E-newsletter or hits on the website; - Annual travel questionnaire, to understand the transport mode choices for the journey to school; and - Demonstrate interest and participation in school transport programs, to be monitored daily/ weekly by way of clicks/ hits on the TAG and website, and use of bicycle parking.
51			<p>The traffic conditions in Westmead are of significance to the Local and State government as the precinct includes Westmead Hospital and Westmead Children's Hospital. These two hospitals form the basis of the Westmead Medical Precinct supported by a private hospital, research institutes, a proposed University of Sydney campus and multiple ancillary medical uses. A large primary school in this precinct puts the expansion of the precinct, and the jobs that go with it, at risk due to the traffic it generates from parent pick up and set down in peak periods. Council is also concerned that traffic delays may also affect ambulance and emergency response times.</p>	<p>The WCC site sits within the Westmead Health and Education Precinct, and will support the predicted residential growth within the Westmead precinct.</p> <p>As note above in response to Item 37, site-generated car trips during the school peak periods will be reduced due to operation of the OOSH facility on-site. The OOSH facility will result in the spread of car trips into the school off-peak periods and flattening the traffic movements during the school peak periods. In light of this, the SIDRA network modelling will be reviewed and updated.</p> <p>Notwithstanding, emergency vehicles have priority on the road network at all times. In Westmead, and specifically surrounding the WCC site, emergency vehicles are further prioritised over general vehicle traffic by having access to the T-Way.</p>

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52			<p>While the State government is investing heavily in public transport in this area, it is anticipated that with the growth in the suburb there will still be an increase in parking and traffic associated with the development described above. Increased traffic congestion associated with the primary school could restrict the development envisaged for the area, which in turn could result in some of the new public transport services not being used to the extent that they otherwise would. Note that a large primary school in this location is unlikely to benefit significantly from the improved public transport.</p> <p>As outlined above, the Council objects to the proposal on traffic grounds.</p>	<p>Improved public transport services within the precinct will directly affect those who can make independent travel choices, including adults, teenagers and the elderly. However, this would also significantly benefit young students whose parents would have previously driven them to school on their way to work, however will now use these new modes of transport. This would then encourage travel behaviour change from a younger age in such primary school students.</p> <p>Furthermore, the Framework Travel Plan initiatives will encourage greater use of public transport travel to school by educating staff, students and parents of the available routes, and helping develop further measures to bridge gaps in the network which will benefit the site and the surrounding precinct.</p> <p>Schools are a vital service in any new area of development and should be accommodated to support the growth of the precinct. The provision of OOSH, together the implementation of the Framework Travel Plan initiatives will all reduce the potential for short-term congestion identified with school peak periods.</p>
53			<p><u>Connectivity - Urban Design</u></p> <p>An alternative access to this site is required between the school buildings and the playing fields that can be connected to Farmhouse Road South to the east and Bridge Road to the west.</p> <p>The street block in which the school is located is bounded by Hawkesbury Road, Darcy Road, Bridges Road and the railway. It is extremely large and not conducive to walking. With the introduction of the light rail and potentially the Metro it is essential that publicly accessible streets and/or shareways are introduced to reduce the size of this block and provide better connectivity to the public transport. The Draft Westmead Innovation District Masterplan sets out a vision for a connected precinct and includes a number of principles, included at Attachment 1, that highlight the importance of an appropriate street network.</p> <p>Farmhouse Road South is a new street at the eastern end of this block that connects directly to Hawkesbury Road. On the western end there is the potential to connect to Bridges Road as redevelopment of these sites take place. The sketches included below illustrate the difference in distance and improved accessibility a new shareway can make. It should also be noted that the topography is such that a new path between the school buildings and the playing fields provides a more level</p>	<p>A detailed response to the connectivity concerns raised by Council is provided in the covering Response to Submissions Report.</p> <p>As a member of the Westmead Alliance, CEDP agrees that a fine grain network of connections would assist with accessibility and connectivity around the Westmead precinct. As discussed with Council, future stages of the WCC Master Plan seek to address this and include new pedestrian and vehicular connections into and through the site. This includes an east-west connection within the WCC campus, as suggested by Council in the draft Westmead Innovation District Masterplan.</p> <p>CEDP is willing to provide these connections within the boundaries of the WCC site, as part of the ongoing development of the campus. However, it is incumbent on Council and surrounding landowners to ensure that meaningful connections can be made beyond the site's boundaries. In CEDP's recent submission to the exhibition of the EIS for Sydney Metro West (SSI-10038) they encouraged Sydney Metro to ensure that there are adequate connections in and around the station precinct, both for WCC and broader users of the precinct.</p> <p>In the interim, a Framework Travel Plan has been prepared to encourage and support walkability and active transport to the WCC (Appendix D).</p>

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			<p>access to Hawkesbury Road than via Darcy Street. It also has the potential to have canopy trees and provide a far less hostile environment than Darcy Road.</p> <p>As outlined above, the Council objects to the proposal on lack of connectivity grounds.</p>	
54			<p><u>Open Space and Recreation</u></p> <p>Council has significant concerns regarding the loss of open space and active recreational facilities resulting from the proposed campus redevelopment.</p> <p>Currently both Catherine McAuley and Parramatta Marist High access Council's sportsground facilities for their active sport and recreation needs at Ollie Webb Reserve (Parramatta), Jones Park (Parramatta), Binalong Park (Toongabbie), Doyle Ground (North Parramatta) and Arthur Phillip Park (Northmead) as they are unable to be catered for on the school site.</p> <p>The current site incorporates 6 x multi-use courts and 1 x junior sportsfield; however, the proposed development results in the loss of the junior sportsfield and a reduction of multi-use courts from 6 to 2. This significantly reduces the availability of open space and active recreational opportunities within the site and a likely decreased capacity to accommodate the physical activity requirements of the up to 1,680 students (sought under this application, noting that the Applicant is planning subsequent stages).</p> <p>Council's draft Community Infrastructure Strategy (CIS) has identified a lack of sporting fields and active recreational facilities in the surrounding area, with existing Council facilities, including the sports fields listed above being at or near capacity. Council is therefore unable to accommodate any increased demand created by the reduced open space and active recreational facilities within the campus as well as the additional student population.</p> <p>The CIS also identifies the opportunity to partner with other levels of government specifically within educational</p>	<p>Refer to responses above and in the covering Response to Submissions Report. Overall, the proposed open space design represents an innovative and modern approach to the provision of open space, which aligns with CEDP's learning pedagogy and is supported by independent research.</p> <p>The open space design:</p> <ul style="list-style-type: none"> Comprises purposefully designed, age appropriate spaces that are inclusive, and cater for students of both genders and all ages. In this regard, whilst the ground level play space will be accessible by all students, it will primarily be used for play and outdoor learning by years K-2 to provide a separate space for younger, more vulnerable children. Provides open space areas adjacent to learning areas, which encourages use of the space, enhances supervision and encourages engagement between staff and students. It also takes pressure off vertical and horizontal movements during the day and reduces time spent walking from place to place so that there is more time for students to exercise, socialise, explore and learn. Provides open spaces, which in conjunction with neighbouring learning areas, will enable teachers to be flexible and agile in their grouping and organisation of students. The size of the rooms means that multiple classes can also be grouped together for different activities and the indoor/outdoor flow will enable varied activities. Is accessible in all weather conditions, so children never spend recess and lunch indoors on hot, wet or windy days. Provides activated spaces with a range of equipment and materials which encourage greater physical activity from a greater number of students when compared to traditional open play space, by providing spaces for unstructured and free play, to encourage creativity, chance encounter and exploration among the students. Comprises multi-use spaces which can be used for outdoor learning as well as play and circulation, offering better opportunities for supervision. Provides an open play area at Level 5 which focuses on the importance of fitness and exercise, with multi-sport court facilities, open synthetic turf areas for play and amenity, and a running track for sporting and recreational uses to allow for a range of students and sports to utilise the rooftop space at any given time. <p>In response to other concerns raised by Council, it is noted that:</p> <ul style="list-style-type: none"> The existing ovals are being retained under this proposal. They will be available for use by all students of the WCC. The Catherine McAuley hockey field is being replaced in Stage 1, as part of the early works package.

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55			<p>institutions or the private sector to provide access to recreational facilities and open space to meet the short falls that Council cannot feasibly provide however this cannot be achieved when re-development of sites are reducing the availability of facilities and open space.</p> <p>The Applicant's Social Impact Assessment has not addressed the impact of the loss of open space and recreational facilities nor how this impacts upon the ability of students to be able to undertake adequate levels of physical activity, particularly in the context of the limited capacity of nearby Council open space and recreational facilities.</p> <p>As outlined above, the Council objects to the proposal on loss of open space grounds.</p>	<ul style="list-style-type: none"> In the future, the Master Plan seeks to replace some existing areas of at-grade open space with this new model i.e. open space that is more activated, inclusive and accessible, and results in better learning and supervision outcomes. The Master Plan continues to provide significant space for an oval/field in the south of the site. The oval will continue to be available for all students of the WCC. Preliminary figures indicate that the total area per student will be approximately 20% greater than EFSG at the completion of the Master Plan. At the completion of this proposal, there will be over 8m² of open space per primary school student. This includes spaces within the building, as well as ground level play space under and adjacent to the new Primary School Building. This figure excludes the ovals. For clarity, the ovals will be used for the delivery of the PDHPE curriculum but they are not included in the play space calculation. Indicatively, the Master Plan can accommodate up to seven (7) sports courts. <p>Based on the above, it is not anticipated that the proposed development would put any additional pressure on Council's open space infrastructure.</p> <p>CEDP would welcome Council's ongoing involvement in the development of the Master Plan for the site, with a view to providing recreation facilities that are suitable for use by the school as well as the broader community. It is noted that currently the community has no access to the site, and so allowing public access to the site will result in an improved open space outcome when compared to the existing situation.</p>
55			<p><u>Zoning & Permissibility</u></p> <p>The subject site is currently zoned SP2 Educational Establishment, meaning that a 'place of public worship' is not permitted within the zone. It is acknowledged that the applicant has defined the place of public worship as an 'ancillary use'. Per the Planning Circular PS 13-001, if a component serves its own purpose, it is not a component of the dominant purpose but an independent use on the same land. It is a dominant use in its own right. In such circumstances, the development could be described as a mixed use development. That is, it is not ancillary.</p> <p>Given that the church does not rely on the school for its operation, operates independently on weekends, and is managed separately to the education uses, there is an argument to be made that the use is a dominant use in its own right and would not be permissible.</p> <p>However, given the objectives of the zone and the nature of the uses proposed the Council would not object to the Department using its powers under the state significant</p>	<p>In response to these comments, additional information has been provided regarding the use of the church by both the schools and the wider parish community.</p> <p>As detailed in the covering Response to Submissions Report, for the majority of the time, the church will be used for the purposes of hosting church services, classes, events and meetings for children attending the adjoining Catholic schools, as well as school teachers and the families of children attending the school.</p> <p>Use of the Sacred Heart Parish Church by the broader community, including on weekends, is secondary to the use of the church by the schools and the church use is therefore ancillary to the Catholic school use.</p> <p>Notwithstanding, and as acknowledged by Council in their submission, in the event that the Department forms the view that the Parish Church is not considered 'development that is ordinarily incidental or ancillary to' the educational establishment, the SSD can reply on Section 4.38(2) of the EP&A Act to enable assessment and approval of the application.</p>

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56			<p>development system to allow this element of the scheme should it feel that it is appropriate to do so.</p> <p><u>Accessibility</u></p> <p>As discussed in detail above the proposal fails to connect the site into the wider Westmead area. This is exacerbates access issues. A new thoroughfare would greatly reduce the distances to the transport hubs towards Hawkesbury and Darcy Roads, including the majority of buses, the train station and future Parramatta Light Rail.</p> <p>All aspects of the public domain design must be delivered according to the requirements of the Australian Standards and best practice universal design. The applicant is obligated to provide a fully compliant detailed universally accessible design. Any proposed thoroughfare should take into consideration the Australian Standards including those relating to disability. Relevant standards would include the suite of AS1428 that provides details on continuous accessible paths of travel. The objective of these standards is to provide manageable pathways for persons with variable abilities.</p> <p>Pathways with a gradient of less than 1:20 and cross falls no greater than 1:40 is recommended as it provides the best outcome with the largest percent of the population able to traverse the path.</p> <p>The pathways should connect accessible buildings, facilities and spaces including the transport stops, parking areas including any accessible passenger loading areas, drop off zones, and the public streets and footpaths surrounding the site.</p> <p>Further consideration should allow for the installation of rest points drinking fountains and seating along the pathways.</p>	<p>As outlined above, future stages of the Master Plan provide new north-south and east-west connections within the campus which align with the intent of Council's draft Westmead Innovation District Masterplan.</p> <p>With respect to the accessibility of the proposed development, Alleanza has confirmed that the developed design will ensure effective, appropriate and safe use by all by complying with the following statutory and regulatory guidelines:</p> <ul style="list-style-type: none"> • Federal Disability Discrimination Act (DDA); • Disability (Access to Premises – Buildings) Standards 2010; • Building Code of Australia (BCA) Part D3, F2, E3; • AS 1428.1:2009 - (General Requirement for Access); • AS 1428.4.1:2009 - (Tactile Ground Surface Indicators); • AS 2890.6:2009 - (Parking for People with Disabilities); • AS 1735.12:1999 - (Lift Facilities for Persons with Disabilities); and • Parramatta Development Control Plan 2011. DCP 2011 Part 3 - Development Principles. <p>Additionally, the developed design will consider, as relevant, the aspirational objectives of the following advisory standards not referenced in the BCA or DDA Premises Standards:</p> <ul style="list-style-type: none"> • Universal Design Principles; • Human Rights Commission (HEREOC) • Advisory Note February 2013 on streetscape, public, outdoor areas, fixtures, fittings and furniture; • AS1428.2:1992 Enhanced and Additional requirements; • AS1428.4.1 Draft Way-finding Standard; and • AS3745:2010 – Planning for Emergencies in Facilities (to assist with design strategies for provision for escape for people with disability that may require assistance).
57			<p><u>Biodiversity & Creek Riparian Corridor</u></p>	<p>The requirement to prepare a Vegetation Management Plan is considered unnecessary as no works are proposed within the riparian corridor. A Vegetation Management Plan will be prepared when works</p>

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			Priority weed species and weeds of national significance have been identified within the adjacent riparian corridor containing Swamp Oak Floodplain Forest Endangered Ecological Community (EEC). To ensure the removal of weeds, offset tree removals throughout the site and to improve overall ecological integrity of the EEC, a Vegetation Management Plan should be prepared and implemented within the adjacent riparian corridor. This document is to be submitted to Council for review prior to any determination.	are carried out within the riparian corridor. For information, the Landscape Rehabilitation Plan and Vegetation Management Plan that was prepared by JMD Design in 2009 has been provided at Appendix P . These Plans will continue to apply until such time as new works are carried out within the riparian corridor.
58			<p><u>Stormwater Engineering</u></p> <p>As previously raised in our SEARs submission water quality of stormwater discharges from the site should with Council's DCP 2011 and be modelled using 'MUSIC' or similar software. This information has not been provided.</p> <p>Council strongly prefers integration of the WSUD systems into the landscape with design elements such as deep soil, bio-swales, wetlands and the like in preference to 'end-of-pipe' proprietary water treatment devices. From the information provided it would appear that the Applicant has chosen tank containing 'Stormfilter' proprietary devices as the only approach to water quality management. (Water Management Plan and Civil Drawings). Given the size of the site, there is sufficient opportunity to design the landscape to incorporate WSUD, and this should be pursued.</p>	<p>MUSIC Modelling has been undertaken by Northrop and is provided at Appendix J. Northrop has also prepared a Stormwater Engineering Statement to address Council's concerns (refer to Appendix K).</p> <p>With respect to WSUD, the proposed design has considered Water Sensitivity Urban Design (WSUD) and encompasses a number of proprietary treatment devices and grassed swales for the capture, conveyance and treatment of stormwater.</p> <p>Due to the existing batter along Darcy Road, the utilisation of aboveground bioretention systems results in significant catchment areas bypassing the stormwater network and subsequent stormwater water quality systems to therefore not meet the water quality reduction targets prescribed in Parramatta Council's DCP.</p> <p>As on-site stormwater detention is required for the site, the designer has combined water quality treatment within the detention structure. This is considered to be an appropriate design solution for the project given the design constraints which restrict the possibility of above-ground bioretention systems to meet DCP requirements.</p> <p>Northrop has reviewed two potential locations to implement a raingarden within the proposed landscaped area, however both locations have physical constraints and would contradict with other comments raised regarding the loss of open space and recreational facilities.</p> <p>It is also noted that small children will have access to this development. Typically, it is not good engineering practice to have ponded water in the vicinity of small children regardless if access is restricted by fencing or other means.</p>
59			<p><u>Environmental Health</u></p> <p>Matters relating to contamination, acoustic mitigation and waste management have been adequately addressed by the EIS. Conditions of consent relating to compliance with reports or further work required as the project continues are required.</p>	<p>Noted. Food storage areas can be addressed by way of condition.</p> <p>In response to Council's concerns, a Hazmat Letter has been provided by Banksia EOHS for the Mother Teresa Primary School building (Appendix Q), which confirms that:</p> <ul style="list-style-type: none"> • The building is of recent construction, being built after 2003. • The lift at the site is hydraulic and no brake pads are present. • An inspection of the school and grounds identified no suspected asbestos containing materials.

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			<p>A new Hazardous Materials Survey is required as the current report is dated 2016, and is considered to be out of date.</p> <p>Insufficient information has been provided in relation to food storage areas to enable an assessment. Conditions of consent could be used to address this issue.</p>	<p>In summary, Banksia EOHS was unable to identify any asbestos containing materials at the site, and the building may be regarded as asbestos free.</p> <p>It is noted that no works are proposed to other existing buildings as part of the application.</p> <p>Given that no hazardous materials have been used on the site since 2016, there is no need to provide a more up to date report.</p>
60			<p><u>Development Contributions</u></p> <p>Based on the Capital Investment Value document provided by the Applicant, which includes a summary of estimated costs, the development is valued to cost approximately \$80,474,245. The land is located within the 'outside CDB development contributions plan', therefore, a 1% levy is required. Local contributions= \$804,742.45.</p> <p>It is noted that the Applicant is seeking an exemption from the payment of development contributions. The relevant contributions plan does not provide for any such exemptions and as such, a condition for the provision of contributions should be included on any consent.</p>	<p>CEDP reiterates the position outlined at Section 3.15 of the submitted EIS. That is, the proposed development should be exempt from the payment of development contributions on the basis that the school and church will provide all required amenities and services on-site, and are not expected to generate any additional demand for public amenities or services.</p> <p>If the Department is of a mind to levy the development, it is requested that the condition be drafted so that any contribution is required to be spent on works in the vicinity of the site, and which would assist in addressing the connectivity concerns raised by Council in their submission.</p>
61			<p><u>Consultation with Councillors</u></p> <p>Given the limited period of time given to Council to respond to this development, it has not been possible to formally refer this submission to a Council meeting for endorsement by our elected members. Councillors, however, were provided with an opportunity to comment on the proposal and to review a draft of this submission.</p> <p>Comments received from Councillors align with the technical responses made by officers in the preceding sections of this submission. However, given the timeframe provided for a response the Council's submission only focuses on key areas of concern. For completeness, a summary of concerns raised by Councillors is provided at Attachment Two to this submission which should also be addressed by the Applicant and the Department.</p>	<p>Noted. A response to the Councillors' comments is provided below.</p>

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62	Civil Aviation Safety Authority	Comments	<p>CASA has reviewed the Aeronautical Impact Assessment for the Westmead Catholic Community Education Campus by Avlaw of 20 February. The Aeronautical Impact Assessment includes advice on the impact on helicopter operations at the Helicopter Landing Sites at the Westmead Hospital Complex.</p> <p>CASA does not regulate Helicopter Landing Sites at this stage. It is recommended that NSW Health Infrastructure and the Air Ambulance be considered stakeholders and review the Aeronautical Impact Assessment.</p> <p>CASA has no objections to the development proposal.</p>	Noted.
63	Southern NSW Ambulance Helicopters	Comments	<p>By our assessment the jib of the proposed crane will come within 150m to the north of the normal approach pathway to Westmead. This represents little margin for flight error, particularly in poor meteorological conditions. Due to this, it is essential that the developer understands that the crane(s) have to be well lit and identified.</p> <p>Based upon other developments that occur near hospital helipads within the protected and critical infrastructure zone; the following is the minimum aviation safety lighting requirement that the developer will need to ensure is in place should the development go ahead.</p> <p>As a minimum for all tower cranes:</p> <ul style="list-style-type: none"> • top of crane A frame or cabin: medium intensity flashing red obstruction light • both ends of Jib: medium intensity flashing red obstruction light • along Jib: line of white LED fluoro on a PE cell along the full length of the jib, and • tower section: stairway lights or spot lights attached to the top of the tower pointing down and onto the tower (not up into pilot eyes). <p>As a minimum for all luffing cranes:</p> <ul style="list-style-type: none"> • top of crane A-frame or cabin: medium intensity red obstruction light • end of Jib: medium intensity red obstruction light • along Jib: line of white LED fluoro on a PE cell along the full length of the jib 	Noted. These requirements will be considered and adhered to during development of the detailed Construction Management Plan.

Item No	Name	Type	Issue	Response
			<ul style="list-style-type: none"> • tower section: stairway lights or spot lights attached to the top of the tower pointing down and onto the tower (not up into pilot eyes) • the LED jib fluro lights are to be LED weather proof emergency fluros controlled via a PE cell with a minimum 90 minute battery back-up." 	
64	Air Services Australia	Comments	<p><u>Airspace Procedures</u></p> <p>With respect to procedures designed by Airservices in accordance with ICAO PANS-OPS and Document 9905, at a maximum height of 46.5m (153ft) AHD, the property development will not affect any sector or circling altitude, nor any instrument approach or departure procedure at Westmead hospital.</p> <p>The property development will not affect the Sydney RTCC.</p> <p>Note that procedures not designed by Airservices at Westmead hospital were not considered in this assessment.</p>	Noted.
65			<p><u>Communications/Navigation/Surveillance (CNS) Facilities</u></p> <p>This property development, to a maximum height of 46.5m (153ft) AHD, will not adversely impact the performance of Precision/Non-Precision Navigational Aids, HF/VHF Communications, A-SMGCS, Radar, PRM, ADS-B, WAM or Satellite/Links.</p>	Noted.
66	NSW Environment Protection Authority (EPA)	Comments	<p>As previously advised by the EPA on 11 November 2019, the proposal does not constitute a Scheduled Activity under Schedule 1 of the Protection of the Environment Operations Act 1997 (POEO Act) and does not require an Environment Protection Licence, nor is the proposed activity being carried out by, or on behalf of, a public authority, therefore the EPA is not the appropriate regulatory authority.</p> <p>Accordingly, the EPA has no comments regarding the proposal and has no further interest in this proposal.</p>	Noted.

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67	Heritage Council of NSW	Comments	<p>As delegate of the Heritage Council of NSW, I provide the following comments on the archaeological heritage content of the EIS:</p> <ul style="list-style-type: none"> EIS: <i>Section 2.2.5 Heritage and Archaeology</i>. Provides a concise overview of heritage and archaeology. EIS: <i>Section 5.6 Heritage</i>. Provides succinct information on nearby locally listed heritage items and potential impacts on views and vistas. However, there is no comprehensive discussion of the potential, impact and management of historical archaeology at the site. The recommendations for managing historical archaeology discussed in the SOHI are not included. EIS: <i>Section 5.7 Aboriginal Heritage</i>. An overall information summation. The final bullet point recommends an historical archaeological assessment if produced prior to commencement of the proposal, however historical assessments do not evaluate Aboriginal archaeology or heritage (and see comments below). <i>Table, Page 80</i>. The 'Potential Environmental Impact' column for Item 'Heritage and Archaeology' contains two relevant points however it does not list historical archaeology. 	Noted.
68			<p>I also note the following errors in <i>Appendix Q – Westmead Catholic Community: Statement of Heritage Impact</i> (Comber Consultants, February 2020):</p> <ul style="list-style-type: none"> The SOHI in Section 2.3 incorrectly quotes an older version of the <i>Environmental Planning & Assessment Act</i> with reference to Section 89J. The Act has been amended. The SOHI in Section 4.2 Criterion (e) states the area has archaeological potential but does not state whether 'relics' in the land would be of State or local significance. Similarly, Section 4.3 does not specify whether the significance of the site is assessed to be State or local. For subsequent comments by Heritage NSW, it has been assumed the potential historical archaeology is local significance. 	Noted. A revised Statement of Heritage Impact has been prepared by Comber Consulting to address the comments raised by Heritage Council NSW (refer to Appendix L).

Item No	Name	Type	Issue	Response
			<ul style="list-style-type: none"> Section 6.2 of the SOHI refers to the need to undertake an archaeological assessment and apply for a permit under the <i>Heritage Act 1977</i> for testing and possibly salvage of 'relics'. A permit is not required as the provisions of the <i>Heritage Act</i> are suspended by the SSD. 	
69			<p>As Delegate of the NSW Heritage Council I also note that an archaeological testing program to clarify the archaeological potential of the site could have been undertaken while the Environment Impact Statement (EIS) was in preparation, in order to best inform the impacts that are discussed in this EIS. Reference is made to State Significant Development (SSD), Section 4.41, subsection 3 of the <i>Environmental Planning and Assessment Act 1979</i>, where:</p> <p><i>"A reference in this section to State significant development that is authorised by a development consent granted after the commencement of this Division includes a reference to any investigates or other activities that are required to be carried out for purpose of complying with any environmental assessment requirements under this Part in connection with a development application for any such development."</i></p>	Noted.
70			<p>In addition, Section 9.0 of the issued SEARS required that;</p> <p><i>If the SOHI identifies impact on potential historical archaeology, an historical archaeological assessment should be prepared by a suitably qualified archaeologist in accordance with the Heritage Division, Office of Environment and Heritage Guidelines 'Archaeological Assessment' 1996 and 'Assessing Significance for Historical Archaeological Sites and Relics' 2009. This assessment should identify what relics, if any, are likely to be present, assess their significance and consider the impacts from the proposal on this potential archaeological resource. Where harm is likely to occur, it is recommended that the significant of the relics be considered in determining an appropriate mitigation strategy. If harm cannot be avoided in whole or part, an appropriate Research Design and Excavation</i></p>	A revised Statement of Heritage Impact has been prepared by Comber Consulting to address the comments raised by Heritage Council NSW (refer to Appendix L).

Item No	Name	Type	Issue	Response
71			<p><i>Methodology should also be prepared to guide any proposed excavations or salvage programme.</i></p> <p>The requirement of the SEARS has not been met by the currently submitted documents which, although impact on historical archaeology has been identified, have not then provided an Archaeological Research Design and Excavation Methodology.</p>	
			<p>The following Conditions are recommended to manage historical archaeology if the proposal is approved:</p> <ol style="list-style-type: none"> 1. Before excavation that may disturb archaeological 'relics', the Proponent must nominate a suitably qualified Excavation Director who complies with the Heritage Council of NSW's Criteria for Assessment of Excavation Directors (2019) to oversee and advise on matters associated with historic archaeology and advise the Department of Planning, Infrastructure & Environment (DPIE) and Heritage NSW. The Excavation Director must be present to oversee the excavation and advise on archaeological issues. The Excavation Director must be given the authority to advise on the duration and extent of oversight required to ensure that archaeological 'relics' are recorded to an adequate standard. 2. Before any excavation at the site an Archaeological Assessment, Research Design and Excavation Methodology is also to be prepared to guide any proposed excavations. This to be provided to the Department and to Heritage NSW to confirm adequacy of the proposed methods. 3. A final archaeological report must be submitted to the Heritage Council of NSW within one year of the completion of archaeological excavation on the project. 4. The Proponent must ensure that if substantial intact archaeological deposits and/or State significant relics not identified in the 	<p>A revised Statement of Heritage Impact has been prepared by Comber Consulting to address the comments raised by Heritage Council NSW (refer to Appendix L). The revised Statement addresses proposed Conditions 2 and 3.</p>

Item No	Name	Type	Issue	Response
			Archaeological Assessment prepared for the project are discovered, work must cease in the affected area(s) and the Heritage Council of NSW must be notified in accordance with s.146 of the <i>Heritage Act 1977</i> . Additional assessment and approval from DPIE may be required prior to works continuing in the affected areas(s) based on the nature of the discovery.	
72	Sydney Trains	Comments	I can confirm that due to the distance of the proposed works to any RailCorp land or assets, Sydney Trains have no comment on the proposed development.	Noted.
73 74 75	Transport for NSW (TfNSW)	Comments	<u>Traffic Impact Assessment (TIA)</u> Major construction to deliver the Parramatta Light Rail (PLR) project has begun in 2020 with the network expected to commence services in 2023. The proponent can find additional information on the PLR project at http://www.parramattalightrail.nsw.gov.au .	As advised by TfNSW during project consultation, the Parramatta Light Rail EIS was reviewed as part of the SSDA analysis which is available at the website link above.
76			It is unclear if the proposed multi-storey car park (which is subject to a separate Early Works DA to be submitted to City of Parramatta Council, as noted in section 1.2.1 of the Environmental Impact Statement) is included in the traffic modelling outputs presented in section 7 of the TIA. Clarification should be provided in regards to the modelling results which should demonstrate the entire impact of the proposed development, which includes the function of the multi-storey car park.	The SSDA analysis includes the multi-storey car park.
77			Table 2.2 of the TIA does not reflect changes to bus services in the area, this information should be updated.	Noted. Updated bus services are provided in Table 4 of Appendix C .
78			Section 6.3.2 of the TIA states that “... <i>peak demand, as well as weekend and weekday services, would be sufficiently accommodated off-street by the approximate 472 car parking spaces to be located on-site</i> ”.	Noted.
79			As the adequacy of on-site parking provision would depend on the proposed multi-storey car park which is subject to a separate approval, the Response to Submissions should give elaboration on how the parking demand could be managed within the context of the SSD proposal should the proposed multi-storey car park not be available.	The SSDA analysis includes the multi-storey car park.

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80			Information has not been provided on how/if school access points and school zones will be impacted as part of the new proposal and how drop off/students will be managed moving forward.	<p>The location of school zones will be reviewed in consultation with TfNSW based on the location of site access points, in particular, the new eastern-most site access driveway to the multi-storey car park (subject to separate DA to Council).</p> <p>In the future, peak period student pick-up and drop-off will be managed by teachers on morning and afternoon duty at both the primary school and high school kiss and ride zones. Specifically, for the primary school, teachers will observe the unique student ID that is displayed on the vehicle dashboard and will call-up the corresponding student to the vehicle. Teachers will assist primary students into and out of vehicles to ensure a smooth and efficient pick up and drop off operation. Then, teachers will usher students away from the vehicle into school, and usher vehicles to exit. Parents must stay in the vehicle at all times - teachers will be present to supervise this.</p> <p>Kiss and ride zones for primary students and high school students will occur at separate locations on-site, which will alleviate the peak drop-off and pick-up loads during the school peak periods.</p> <p>CELC and OOSH children and parents will arrive/leave the site before and after the school peak periods, and the associated car trips would be spread across a wider time period which occur outside of the school peak periods as well. As such, these loads would be less concentrated in comparison to the school peak periods and would not require management or supervision by staff members.</p>
81			Details of daily service vehicle movements have not been demonstrated. Details of the number of anticipated daily service vehicle movements associated with the operation of the new school and the Parish Church, i.e. tuck-shop, grounds keeping, waste removal and other deliveries should be provided.	<p>Delivery, waste collection and maintenance vehicle movements would continue to occur as per current arrangements. Namely, during teaching times and outside of school peak periods via the existing site access to the existing at-grade car park.</p> <p>CEDP has advised that deliveries to the site will be as follows:</p> <ul style="list-style-type: none"> • Waste collection - 3 times per week before 6am, undertaken by a rigid truck. • Canteen - 3 times per day (1 for each school) before 8am, undertaken by a van. • Post - 1 daily at approximately 11am, undertaken by a van. • Adhoc/maintenance - as required, occurring during school operating hours.
82			Details of how coaches to be deployed servicing the proposed development have not been demonstrated. Details of how coaches will be catered for and managed onsite, including access, pick up / drop off and layover should be provided.	<p>Coaches would access the site and existing bus bay via the existing site access driveway located west of Mons Road. The site is currently designed to cater for coaches on-site. However, it is noted that coaches only access the site on special occasions, such as sporting events or school camps.</p> <p>Otherwise, buses with the dimensions of a standard 12.5m heavy rigid vehicle, access the site on a daily basis which are also currently accommodated on-site. The bus bay has a total length of 125m and can accommodate up to seven buses at any one time (avoiding queuing over crossings) as shown in Figure 6 of Appendix C.</p> <p>Morning and afternoon school bus data gathered at the existing site indicates that there may be up to three buses occupying the bus bay at any one time, which can be adequately accommodated with the existing bus bay.</p>

Item No	Name	Type	Issue	Response
83			Section 8 and other relevant sections do not take into consideration of the impact of Sydney Metro West. A new Metro station will be located at Westmead and bus services to the precinct will be improved. Consideration should be accounted for in the GTP in regards to the potential assistance to mode shift in relation to the future improvement to bus connections from areas south of the Western Line into Westmead.	Subject to consultation with TfNSW and CDC NSW, there will be opportunities in the future to broaden the existing catchment for bus services to the site and/or precinct more generally. There is sufficient capacity within the existing bus bay in order to accommodate potential additional school bus services within the site during the morning and afternoon school peak periods. Noted. The Framework Travel Plan prepared by Frank Turquoise Group reviews the modal shift potential for the WCC site; considering all of the upcoming transport infrastructure within the Westmead precinct, a feasible medium-high modal shift target range is between 9.5%-12.5%. On this basis, the 10% modal shift which has been adopted in the TIA is deemed to be an appropriate target for the site.
84			<p><u>Green Travel Plan</u></p> <ul style="list-style-type: none"> • The proposed development would result in a significant increase in student enrolments and staff. The Green Travel Plan (GTP) should be further developed with information and more robust actions, including: <ul style="list-style-type: none"> ○ Specific mode share targets that support sustainable transport outcomes. Greater emphasis is required to reduce private vehicle trips (currently journey to school (by private vehicle) trips are significantly higher than the state average. The current GTP seeks for a mode shift of 10% towards public transport. Initiatives should be further developed to support higher targets towards walking, cycling and public transport; ○ Analysis of the locations which staff travel from should be carried out to inform higher mode share targets and strategies for staff; ○ Provide details of measures to encourage sustainable transport choices amongst parents, students and staff for example information on walking routes, cycling routes as well and information packs for parents and students; ○ Consider wayfinding measures such as local street signage to identify direction and distance to school and consider establishing parent or teacher-led walking groups; 	<p>A detailed response to TfNSW's comments is provided in the covering Response to Submissions Report and elsewhere in this response, including Item 50.</p> <p>In response to TfNSW's feedback, a Framework Travel Plan has been prepared by Frank Turquoise to set out CEDP's process to manage travel demand at the WCC (Appendix D). The Framework Travel Plan provides an analysis of staff and students travel patterns and locations and outlines measures to encourage sustainable transport choices amongst students and staff.</p> <p>The Framework outlines the structure for the Travel Access Guide, Communications Plan and Monitoring and Evaluation Plan which will be used to guide the achievement of the 10% mode share target.</p>

Item No	Name	Type	Issue	Response
			<ul style="list-style-type: none"> ○ Details of students who are eligible for STSS and those who are within walking/ cycling distance/ catchment, and promote the use of STSS and School Term Travel Pass; ○ Provide sufficient end of trip facilities and storage facilities (for large items and to reduce daily trips with these items) for students to encourage active travel to school; ○ Consider bike share schemes for students; ○ Include a behaviour change program to encourage greater sustainable transport choices that target specific student groups e.g. encourage early sustainable behaviours through Bike Education in primary years and targeted programs for high school students; ○ Details of the appointed travel co-ordinator and the stages in which the GTP will be implemented; ○ Determine how annual travel surveys will be conducted and identify the evaluation process including how mitigations, and any changes be implemented; ○ Information on school operation hours including before and after school care as well as extra circular activities and the implications for spread of the demand throughout these operational hours; ○ Information on special event trips for school activities such as school carnivals, swim school, excursions etc.; ○ Greater detail in the TAG including examples of material to be provided, relevance to target different age groups and how they will be distributed; ○ A Communications plan detailing how the GTP will be communicated to the school community; and ○ A statement of support from the Principal to encourage sustainable transport outcomes identified in the GTP. 	

Item No	Name	Type	Issue	Response
86			<p>The applicant should further consult with TfNSW to identify future service planning for the site. A condition should be imposed to requesting the applicant to liaise with Sydney Coordination Office within TfNSW regarding the GTP prior to the commencement of school operations.</p> <p>TfNSW provides the Department, in TAB A, with suggested conditions of consent to include in any determination of the application.</p> <p>The Department should also be advised that the proponent will need to obtain Section 87 of the <i>Roads Act 1993</i> approval and concurrence under Section 138 of the <i>Roads Act 1993</i> for the proposed works on Darcy Road. TfNSW advises that the proponent should address the above comments before seeking TfNSW approval and concurrence under the <i>Roads Act</i>.</p>	<p>Noted.</p> <p>CEDP and its consultant team met with the Sydney Coordination Office (SCO) on 2 July 2020 to discuss the proposed Framework Travel Plan. The SCO expressed support for the proposed Travel Plan and committed to working with CEDP to share information regarding future transport initiatives in the precinct, including work being undertaken at Westmead Hospital. CEDP will be meeting with the SCO again after lodgement of this Response to Submissions package.</p>
87	WaterNSW	Comments	<p>Thank you for requesting WaterNSW's comments on the EIS for the above project. Please note that the subject site is not located near any WaterNSW land, assets or infrastructure, and therefore we have no comments or particular requirements.</p>	<p>Noted.</p>
88	Endeavour Energy	Comments	<p>The applicant should note that generally a Supply Offer includes the following advice:</p> <p><i>The Supply Offer is part of the Connection Offer for a Standard Connection Service and is valid for three (3) months from the date of issue.</i></p> <p><i>Where this Connection Offer has lapsed, you or your Level 3 ASP must contact Endeavour Energy with the request to extend the Connection Offer. Endeavour Energy will assess your request and will inform you of the outcome. It must be recognized that the network is being constantly extended/augmented as new customers get connected. This means that for your Connection Offer to be extended, you Supply Offer may require alteration. If this is the case, additional fees to cover administrative costs may apply.</i></p>	<p>Noted.</p>

Item No	Name	Type	Issue	Response
			<p>Endeavour Energy does not reserve supply for proposed developments ie. unless the application for connection of load proceeds, there is no guarantee that the current surplus capacity within the existing local network will remain available – particularly considering the proximity of the site to Westmead Hospital, Western Sydney University - Westmead Precinct, Westmead railway station etc.</p> <p>As such, Endeavour Energy's Network Connections Branch are managing the conditions of supply with the proponent and their Accredited Service Provider (ASP). To complete the application for connection of load the applicant and their ASP will need to address the list of requirements included in the Supply Offer in order to comply with Endeavour Energy's standards and with the Terms and Conditions of the Model Standing Offer for a Standard Connection Service. Further advice can be obtained from Endeavour Energy's Network Connections Branch (via Head Office enquiries on telephone: 133 718 or (02) 9853 6666 from 9am - 4:30pm.</p> <p>Subject to the foregoing Endeavour Energy has no objection to the Development Application.</p>	
89	Sydney Water	Comment	<p><u>Water Servicing</u></p> <ul style="list-style-type: none"> • Potable water servicing should be available via a watermain on Darcy Road. Amplifications, extensions and multiple connection points may be required. • Special requirements such as firefighting requirements apply to this development. The proponent should provide details of this at the Section 73 application stage. • Detailed requirements will be covered at the Section 73 Application phase. 	Noted. These requirements will be addressed as part of the Section 73 application.
90			<p><u>Wastewater Servicing</u></p> <ul style="list-style-type: none"> • Wastewater servicing should be available via a 300mm SGW wastewater main (laid in 1946) within the property boundary. Amplifications may be required. 	Noted. This requirement will be addressed as part of the Section 73 application.

Item No	Name	Type	Issue	Response
91	Department of Planning, Industry and Environment (DPIE) (Water and the Natural Resources Access Regulator)	Comment	<p><u>Prior to Approval</u></p> <ul style="list-style-type: none"> The proponent should identify the water source and quantity required for the construction and operation of the development. The proponent must obtain a Water Access Licence should the project be required to dewater 3 megalitres or greater of groundwater per year, in accordance with the Water Management (General) Regulation 2018. 	<p>Water source and supply has been addressed as part of the Infrastructure and Services Report submitted at Appendix J of the EIS. In summary, water supply pressure and flow characteristics have been confirmed and the modelling by Sydney Water shows the main being capable of supporting the required flows for the project.</p> <p>As outlined in the submitted Preliminary Geotechnical and Hydrogeological Assessment (Appendix T), the excavation for the lift shaft should not intercept the permanent groundwater. The proposed development is anticipated to have no impact on the permanent groundwater level and no drawdown effects are foreseen. Minor perched groundwater seepages may be controlled using sump and pump methods to keep the excavation reasonably dry during construction.</p>
92	Government Architect NSW	Comment	Ensure tree retention is maximised and provide drawings which show proposed planting and measures to mitigate heat island impacts for Stage 1 and future stages	Refer to responses above. Tree retention has been maximised as far as possible, whilst providing a new gateway entry into the site (which was supported by GA NSW). The loss of trees will be offset by significant additional canopy and understory planting. This includes approximately twenty-five (25) new trees in the area. As noted below, there will be a total tree canopy coverage of 4,685m ² within the site of the proposed works (4,508m ² proposed and 207m ² existing). This equates to 25% of the development site area.
93	(Note: These comments were provided prior to submission of the SSD DA. GA NSW did not provide a submission during the public exhibition period).		Provide 3D studies which show views and vistas across the site including how sight lines contribute to wayfinding	Additional photomontages have been provided at Appendix I .
94			Develop the wayfinding strategy to ensure it is intuitive and not applied	<p>The Architectural Drawings and Landscape Plans submitted with the EIS included details around access and wayfinding. Further, as outlined below, the new Primary School Building and CELC will use the existing and proposed car parks in the western part of the campus for parking, as well as pick-up and drop-off activities. There will be no need for primary or CELC students or visitors to cross the campus to access the new multi-storey car park, eliminating concerns around pedestrian safety and linkages.</p> <p>An access and wayfinding plan has been provided at Appendix F to demonstrate how this operates as part of the proposed works.</p>
95			Provide circulation diagrams which detail access to and from the multi-storey carpark, drop-off and pick-up arrangements for the CELC and primary school, and pedestrian access that is accessible, rationalised and legible in, around and across the site at different times of the day	<p>As shown in the Car Parking Allocation Plan at Appendix B and C, the new Primary School Building and CELC will use the existing and proposed car parks in the western part of the campus for parking, as well as pick-up and drop-off activities.</p> <p>The multi-storey car park (subject to separate DA) in the north-eastern corner of the site will be used by high school staff and high school visitors, as well as for high school pick-up and drop-off. It is noted that a small number of primary school staff will also use the multi-storey car park.</p> <p>There will be no need for primary or CELC students or visitors to cross the campus to access the new multi-storey car park, eliminating concerns around pedestrian safety and linkages.</p> <p>An access and wayfinding plan has been provided at Appendix F to demonstrate how this operates as part of the proposed works.</p>

Item No	Name	Type	Issue	Response
96			Provide drawings which detail how the boundary strategy will be implemented including location and type of proposed fencing	The Architectural Drawings and Landscape Plans submitted with the EIS included these details.
97			Provide drawings which show the quality of the space between the primary school, high school and CELC for Stage 1 and future stages, at ground level and including any physical connections or barriers	The Architectural Drawings and Landscape Plans submitted with the EIS included these details.
98			Provide a ground level landscape plan for Stage 1 which shows access in and around the primary school (including to the east) and proposed fencing	Landscape Plans were provided at Appendix H of the submitted EIS.
99			Provide a green travel plan / strategy that seeks to encourage public transport usage to reflect the site's access to bus, train and future light rail services	Refer to responses above. A Framework Travel Plan has been prepared and provided as part of this Response to Submissions (refer to Appendix D).
100			Detail how ESD and sustainability initiatives will be realised in the design of the primary school	ESD was addressed at Section 3.12 of the submitted EIS. The new Primary School Building will be benchmarked against the following: <ul style="list-style-type: none"> • 4 Star Green Star and as-built V1.3. • Climate responsive design in accordance with NSW climate projections for 2020 – 2039.
101			Provide studies to demonstrate that indoor learning areas have appropriate levels of daylight, particularly given the deep floor plates and that classrooms have an internal aspect, and consider the introduction of voids in circulation areas to ensure light reaches lower levels of the building	Refer to response to Item 3 and the covering Response to Submissions Report. In summary, pa Solar and Access Daylight Analysis has been prepared by Erbas Sustain (Appendix O). The design of the building seeks to achieve a balance between providing shade for comfort and sun protection in Summer, and solar access for warmth and light in Winter. With respect to solar access, the analysis finds that: <ul style="list-style-type: none"> • All outdoor play areas at Ground, Levels 1 - 5 received ≥ 3 hours of direct solar access on the Winter Solstice. • On the Summer Solstice, all outdoor play areas at Ground and Levels 1 - 4 are generally well-shaded from direct solar access, with coverage ranging from 55% to 100%. While most of Level 5 is unshaded, parts of the Level 5 outdoor play area remain shaded on the Summer Solstice for sun protection. With respect to daylight, the analysis finds that, on average, 72% -89% of the outdoor play areas achieve an annual average of > 50 lux during the indicative operational hours (8:00am –6:00pm) throughout the year. Overall, daylighting to an average of at least 80% of the outdoor play areas is sufficient for the level of activities equivalent to a public playground. Where required, artificial lighting will be used to complement natural lighting for visual comfort. Based on these findings, the proposal is considered suitable from a daylight and solar access perspective.

Item No	Name	Type	Issue	Response
102			Provide sections which show floor to ceiling heights and the ability for play spaces to be accommodated	Sections were provided at Appendix B of the submitted EIS.
103			Provide elevations and 3D studies which show the proposed architecture of both the primary school and parish church.	Elevations and 3D studies were provided at Appendix B of the submitted EIS.
Councillor Submission				
104	Comments made by Parramatta Councillors	Comments	<u>General</u> This is a significant development for the City of Parramatta with an investment value exceeding 80 million and creating over 1000 jobs. With obvious advantages considering the growth in population and demand	Noted.
105			Concerns are raised with the timeframes given to respond.	The EIS was exhibited in accordance with the requirements of the EP&A Regulation. In addition, CEDP has met with Council Officers on multiple occasions over the past 6 months and with Councillors on at least five separate occasions over an 18-month period.
106			In addition to the traffic and pedestrian safety, such large students' population growth will add pressure to local services which not in line with the long term development goal of Westmead Precinct of being world class medical and research centre/ facility.	Traffic and pedestrian safety has been addressed in detail elsewhere in this response. It is noted that the proposed development is directly aligned with the strategic intent of the Westmead Health and Education Precinct which <i>"seeks to cluster health and education precincts with supporting industries to create agglomeration synergies...."</i> Further, as a member of the Westmead Alliance, CEDP has been working in partnership with Council and other members of the Alliance for a number of years to ensure that the group is working towards the common mission, vision and design principles of the precinct. CEDP has enjoyed Council's engagement and support in that forum to-date.
107			Insufficient green space/play space that would allow for adequate active recreation areas suitable for the anticipated student cohort	The suitability of the proposed open space has been addressed in detail elsewhere in this response.
108			Heritage Significance of the Monastery that is going to be demolished - the Marist Brothers have had a presence since 1875	The Monastery is not heritage listed. The building was constructed in the 1960s and is owned by the Diocese. The Marist Province have expressed full support for the project and has confirmed this in the most recent meeting with Councillors.
109			Recreational space is lost. a) In phase 1, the Macaulay hockey field is lost, as is the entire primary playground. To be replaced with play space on level 3 and 5 of a building, with no real grass.	a) As discussed with Councillors in the meeting held in April 2020, this space is being replaced in Stage 1 and is the primary reason for the splitting out of the Carpark DA and associated early works from the main SSDA (a strategy which has been supported by both Council and the Department). Timely determination of the early works DA will ensure that this space can be delivered and maintained during the construction phases of the project.

Item No	Name	Type	Issue	Response
			b) In later phases, the football fields and basketball courts, as well as pool are all lost	<p>b) As detailed above, whilst this is not subject of the current SSDA, the long-term Master Plan includes replacing some of the existing open space with new fully activated and inclusive play and recreation space in closer proximity to learning areas so that it is accessible by all, and as supported by research, encourages a greater level of physical activity from a greater number of children. All the existing ovals are not lost as asserted by the Councillors. Sports courts will be relocated to new areas within the precinct over stages of the project and will actually increase in number.</p> <p>The old swimming pool has not been operational for over 5 years. It is beyond its useful life. CEDP sees no direct requirement to provide a swimming pool but will continue to engage with its community regarding this matter as a final decision has not yet been made. CEDP supports Council's recent announcement, in partnership with the NSW Government, that it will build a new Regional Aquatic Centre within approximately 1.5km of the WCC.</p>
110			Recent lessons from Arthur Philip HS and Ministerial directions on high rise schools should be looked at and incorporated	<p>This comment appears to contradict later comments in support of a high rise school on CEDP's Ralph Street site.</p> <p>Notwithstanding, high rise schools have been operating successfully overseas for many years, and will become more common in Australia as pressure on land increases and the improved learning outcomes afforded by the new high rise schools become more apparent. CEDP's approach to the development of high rise schools has been ratified by the recent approval of the Santa Sophia Catholic College in Box Hill by the IPC (SSD-9772).</p>
111			Disability and other access to the site, now given a 5+ level primary school as well as a 3+ level car park	The proposed development is DDA compliant.
112			Safety and amenity	The proposal has been designed with the safety and amenity of students and staff in mind.
113			Communication and engagement of the community - given only a short period for the local council, previous refusals of the Catholic Education Office to engage with Councillors, only limited school community engagement	<p>An extensive period of consultation and ongoing engagement with the school communities and the local parish has been a feature of the WCC project.</p> <p>To-date, approximately 200 people attended the six community information sessions. The details of the feedback received are documented in the Community Engagement Outcomes report submitted with the EIS. An Advisory Panel made up of local community members has also been established. It will commence its work in the coming weeks as the design progresses and to-date has met on 3 occasions.</p> <p>Further, CEDP has engaged directly with three councillors (at their request) on at least five occasions over past 18 months. During the Response to Submissions period, CEDP has contacted all Councillors to offer briefings. Only one response has been received to-date.</p>
114			At an information session held at the School on the 4th November 2019 figures presented by representatives of the Catholic Education Diocese of Parramatta (CEDP) stated that by 2028 the Site would reach a capacity of	Refer to responses above regarding the demand for education within the Westmead precinct. Catholic schools in Westmead are unable to meet growing demand, and turn away more than 500 enrolment applicants a year. State schools in the area are also beyond capacity.

Item No	Name	Type	Issue	Response
			5,800 students. There are genuine concerns that the current high standards of education and strong performance results of Parramatta Marist High in the last few years cannot be maintained with such a large increase in volume of enrolments taking the school from 4 streams, 1,000 students to 8 streams and 2,000 students.	<p>CEDP expects that enrolments will grow to meet the provided capacity over the next 6-10 years.</p> <p>CEDP remains focussed on learning – one of the key design principles for the project is ‘Learning Drives Design.’ The CEDP Learning Framework, which seeks to maintain the individual charisms and history of each school, is core to the design approach and CEDP is confident in its learning and operating model.</p> <p>We note that the Councillors have only referenced the boys’ high school. CEDP supports an inclusive community which encourages learning outcomes for all student of both sexes and all ages.</p>
115			There are concerns with the proposed locality of the new Parish Church being built within the School precinct and within close proximity of the school building, it is likely to impact on normal school activities when the Parish Church is required to hold ceremonies such as Mass, Funerals, etc. during the school week.	<p>It is unclear what the Councillors concerns are with regards to the proposed proximity of the church and school. Notwithstanding, details of the relationship between the school and church are provided elsewhere in this response. The church is integral to the operation of the schools and it is not anticipated that use of the church by the community (which would be infrequent during the week) would impact the operation of the schools.</p> <p>Further:</p> <ul style="list-style-type: none"> • The traffic and parking report addresses parking associated with the use of the church. • Many schools are collocated with a parish church. It has been common practice for many years. • The comment appears to contradict the Councillors later comments which advocate for the collocation of a new primary school and Parish Church on the Ralph Street site.
116			Parramatta Marist High will potentially lose 2 sporting fields (refer stage 2 plans). Representatives from the CEDP at Parramatta suggest jungle gyms and indoor climbing facilities are being incorporated in the new integrated facilities to be shared by all schools on the site. Not sure how this improves the open space green area or adds value to the boys and young active men of Parramatta Marist High	<p>The suitability of the proposed open space has been addressed in detail elsewhere in this response. The proposed open space model, which is supported by extensive research, represents an inclusive approach to learning and play that caters to both genders.</p>
117			What will happen to the inter school sporting events such as the weekly MCS competitions, and seasonal athletic and swimming carnivals. Where will teachers and students be able to conduct Physical Education Classes in the future?	<p>The suitability of the proposed open space has been addressed in detail elsewhere in this response.</p> <p>CEDP supports Council’s recently announced Aquatic Centre, which is located within approximately 1.5km of the site and will continue to use Parramatta Park, as per current practice. Further, it is noted that CEDP does not provide swimming pools at all secondary schools (only 1 in existence out of 22 schools – Cerdon College, Merrylands). CEDP seeks to invest equitably across the Diocese so that facilities are commensurate for all students across all schools.</p>
118			It is proposed that the Olympic size swimming pool which is currently out of use will be demolished. No plans currently indicate a replacement for the pool such as an aquatic centre that could be shared by other schools on the site.	<p>As outlined above, the old swimming pool has not been operational for over 5 years. It is beyond its useful life. CEDP sees no direct requirement to provide a swimming pool but will continue to engage with its community regarding this matter as a final decision has not yet been made. CEDP supports Council’s recent announcement, in partnership with the NSW Government, that it will build a new Regional Aquatic Centre within approximately 1.5km of the WCC.</p>

Item No	Name	Type	Issue	Response
				All facilities within the WCC will be available to children from each of the schools. This is in line with CEDP's core Catholic beliefs of equity and inclusiveness.
119			The closure of the school pool over recent years due to lack of investment from the CEDP has meant that swimming activities including learn to swim classes have not been delivered to students.	Refer to responses above.
120			Parramatta Marist High will lose the existing Morley Centre Hall that is to be demolished. The current plans are vague and have little detail as to how and what type of structures and facilities are to be built that can hold an entire school assembly, mass or awards ceremony including students and parents of Parramatta Marist High.	Demolition of the Morely Centre Hall does not form part of this development application. Sufficient and appropriate facilities will be provided as part of future stages of the development. Further, all facilities will be available to children of all schools within the WCC. This is in line with CEDP's core Catholic beliefs of equity and inclusiveness.
121			The plans are very vague and little explanation has been provided as to the future use of the "grey area" illustrated on the proposed plans. When representatives from CEDP were questioned about this on the 4th November suggestions of future commercial and residential applications will look to be incorporated - this is very concerning that specific plans are not being expressed to residents and parents	While we note the Councillors acknowledgment here of one of the recent consultation meetings held with them, the complimentary uses do not form part of this SSD and would be subject to a separate planning process. Notwithstanding, details of the future Master Plan have been provided to the community as part of the consultation process, and have been discussed with the State Design Review Panel as part of their assessment of the project. The future development of complementary uses on the site is also supported by Council's Local Strategic Planning Statement, which states <i>that "The Westmead Health and Education Precinct, which is part of Greater Parramatta and is located immediately north west of the Parramatta CBD, seeks to cluster health and education precincts with supporting industries to create agglomeration synergies...."</i> CEDP will continue to work with local and state authorities regarding the future complimentary uses on the site, to ensure consistency with the objectives of the Westmead Alliance and Council's Strategic Plans.
122			The lack of foresight for the safety of students, parents, teachers and the public around an already very busy Health precinct is alarming. The State Government is continuing to invest and expand Westmead Hospital and the Precinct. Traffic and the safety of the wider community is not being considered.	Traffic and access, including the safety of traffic and access arrangements, are addressed in detail elsewhere in this response, and again we reiterate that the site forms part of a precinct identified for both health and education uses. Further, CEDP operates 80 schools, with approximately 43,000 students. The safety of students and staff is paramount for CEDP, and something that CEDP is well equipped to manage.
123			In what can only be described as disrespectful the new plans also fail to recognise the existence of the Parramatta Marist War Memorial on the site to those that served in war and conflict around the world.	CEDP honours Australia's service men and women and the sacrifices they have made and continue to make. However, this area of the site is not subject to this application.

Item No	Name	Type	Issue	Response
				Future stages of the development will ensure the provision of memorial space. The school has already begun to preserve seeds from the memorial tree so that it may be re-propagated to preserve its legacy and connection to the past.
124			Parramatta Marist and Catherine Macauley High Schools should maintain their independent and uninterrupted inhabitancy in all future plans for the Site and strongly disagree with moving the Parish Church of Scared Heart and its primary school from their current location to Darcy Rd Westmead. If the WCC and the CEDP had carried out a genuine consultation process relating to their development proposals - then local residents and parents of the Schools believe that the following alternate development proposal at Westmead which would achieve the objectives of the Parish Church and the Parramatta Catholic Diocese, could have been considered.	<p>This comment does not relate to the scope of the application.</p> <p>Notwithstanding, Catherine McAuley and Parramatta Marist are both systemic Catholic Schools and will continue to operate as single sex schools into the future within the WCC. The individual charisms of the schools will be respected and will continue to evolve.</p> <p>Further, the proposal has been subject to an extensive consultation process. It is noted that no public submissions were received during the exhibition period which objected to the proposed development.</p>
125			<p><u>Traffic related comments</u></p> <p>Traffic congestion and mobility of students to and from the site are heavily reliant on any transport improvements in the area. Representatives from the CEDP could not answer what it would look like with students filed some 300 - 400 deep at multiple sets of traffic lights, intersections and crossings each morning and afternoon.</p>	A detailed response to Council's concerns around traffic general and student numbers is provided in the covering Response to Submissions Report and in the Traffic and Transport Response to Submissions Report prepared by TTPP at Appendix C . These concerns are also addressed elsewhere in this table, including in response to Item 37.
126			The amount of extra traffic generated would add to the already congested traffic conditions of the existing education and expanding health precinct	A detailed response to Council's concerns around traffic generation and intersection performance is provided in the covering Response to Submissions Report and in the Traffic and Transport Response to Submissions Report prepared by TTPP at Appendix C . These concerns are also addressed elsewhere in this table, including in response to Item 37.
127			Need to consider the cumulative traffic impact of this development along with the expansion of the University of Sydney and Western Sydney University and everything else that's happening or is proposed. University of Sydney and Western Sydney University development itself will double Westmead's workforce by 2036.	Noted. The traffic modelling includes background growth data.
128			Ongoing issues around traffic (both pedestrian and vehicle) on Darcy Road.	A detailed response to Council's concerns around traffic general and student numbers is provided in the covering Response to Submissions Report and in the Traffic and Transport Response to Submissions Report prepared by TTPP at Appendix C . These concerns are also addressed elsewhere in this table, including in response to Item 37.

Item No	Name	Type	Issue	Response
129			The area is already very congested both for car traffic and pedestrian flow during school morning and afternoon peak time period. If the students' population is to be doubled, traffic issue and pedestrian safety needs to be carefully considered.	A detailed response to Council's concerns around traffic general and student numbers is provided in the covering Response to Submissions Report and in the Traffic and Transport Response to Submissions Report prepared by TTPP at Appendix C . These concerns are also addressed elsewhere in this table, including in response to Item 37.
130			<p>Alternative proposal for consideration by Applicant The Diocese should consider building a high rise Catholic primary school and new church at the current Sacred Heart Parish site in Ralph Street Westmead. This move would ensure the site has much greater permeability and access given it is not situated in the already congested health precinct area/side of Westmead. There would also be an opportunity to focus on developing a traffic plan for Hawkesbury Rd that is primary school friendly and specific to accommodate both this new school and likely redeveloped Westmead Public School (in the future); that is, proper drop off bays, pedestrian overbridge and traffic controls could be implemented.</p> <p>The submission goes on to outline the benefits of this proposal, including cost efficiencies, the Ralph Street site being more suitable for a high rise school and retaining the Sacred Heart school on its current site.</p>	<p>A response to this concern is provided above.</p> <p>It is noted that this alternative proposal was not raised by the Councillors at any of the meetings held to-date.</p> <p>CEDP notes that the proposal contradicts earlier objections listed by the Councillors including those against high rise schools and co-location of schools with parish churches.</p> <p>It is also noted that the suggested proposal urges CEDP to relocate its school expansion out of the Parramatta LGA and into the Cumberland LGA.</p> <p>The site at Ralph Street, Westmead is of insufficient size to achieve the proposal put forward by the Councillors and the alternative proposal is unviable. The development the subject of this SSDA facilitates CEDP's learning framework, which supports the co-location of primary and secondary children.</p>
Public and Organisation Submissions				
131	Stephen Narayan	Supports	I support the building of the catholic precinct.	Noted.
Late Submissions Received after Formal Exhibition Period				
132	Petition	Objects	STOP increase in traffic to Westmead Catholic Precinct - Darcy Road	<p>A detailed response to the traffic issues raised is provided above in response to Council's concerns at Item 37 and in the covering Response to Submissions Report. In summary:</p> <p>The submitted TIA did not account for the reduction in trips resulting from the operation of the Out of School Hours (OOSH) facility on the site. Given that the OOSH operates before and after standard school hours, this will result in a significant reduction in trips during school peak periods.</p> <p>The revised modelling shows that the proposal will result in a 77% reduction in the number of vehicle movements at the Darcy Road entry during the morning peak period, when compared to the 'Do Nothing' scenario. The modelling shows that in 2033 (Stabilisation Year), trip generation will be less than the existing trip generation during the AM peak period. In the PM peak period, the 2033 trip generation will be similar to the existing trip generation.</p>

Item No	Name	Type	Issue	Response
133	Anon. 1	Objects	You claim this is a response to the growing needs of the Westmead Community and you now propose to merge two primary schools together, establish an early learning centre and relocate a Parish, all on the same site, where there are currently two high schools and primary school.	<p>Noted.</p> <p>The site sits within the Westmead Health and Education Precinct, which is the largest health and education precinct in Greater Sydney. The Central City District Plan outlines that growth in the Westmead precinct is a priority. Council's Local Strategic Planning Statement (LSPS) states that growth in the area is forecast to bring 4,400 new dwellings to the Westmead precinct by 2036.</p> <p>To support this predicted growth, additional infrastructure, such as improved schools, will be required to service the growing worker and resident population. Specifically, demographic modelling undertaken by DPIE shows that the number of school-aged children is projected to increase over the next 20 years. In the Central City District, an extra 89,360 students will need to be accommodated in both government and non-government schools by 2036. 32% of this predicted growth in school students is predicted to occur in Parramatta, whilst 34% of the anticipated growth of children four years and younger in the Central City District will also occur in Parramatta. Council's LSPS forecasts an additional 30,000 school students in the LGA by 2036.</p> <p>The WCC project is ideally situated to assist in supporting this demand. and allied health services. The existing site benefits from a high level of accessibility, close to rail, bus and road connections, as well as the future Parramatta Light Rail and planned Sydney Metro West.</p>
134			You fail to mention the student capacity you predict to reach or cap enrolments at	The application proposes a primary school with capacity for 1,680 students. Any increase to the number of students beyond the additional primary school capacity will be the subject of a future, separate application.
135			In addition to this proposal, which you fail to mention is Westmead Public Hospital, Westmead Private Hospital, a countless list of specialist doctors, specialist facilities and medical services that all share the same arterial roads as a means to access these services, facilities and schools daily.	Traffic associated with other uses in the precinct has been included in the submitted traffic modelling.
136			Parramatta Council has objected to this proposal, as having a heavy "concentration of activities on the site, that will negatively impact traffic in the area".	Noted. A response to Council's traffic concerns is provided above. The traffic modelling has been revised to take into account the operation of the OOSH. Together with the implementation of the Framework Travel Plan and relocating high school pick-up and drop-off to the new multi-storey car park (subject to a separate DA to Council) the modelling confirms that in 2033, trip generation will be less than the existing trip generation during the AM peak period. In the PM peak period, the 2033 trip generation will be similar to the existing trip generation.
137			I currently have a child at Marist, pre COVID 19 he was catching a bus in the morning, not a school bus, a public local service as there is no school bus that services the many students in the Oatlands / North Parramatta / Carlingford / North Rocks areas & he is picked up every afternoon, as he has afterschool activities, and the time it takes to get home of an afternoon, makes it a long day.	Noted. Whilst the impacts of COVID-19 are acknowledged, traffic modelling has been based on a typical scenario.

Item No	Name	Type	Issue	Response
138			Since COVID 19, we have been doing the morning drop off, as most parents are to ensure the safety and wellbeing of their children, not to mention the social distancing required on public transport at the present time.	Noted. Whilst the impacts of COVID-19 are acknowledged, traffic modelling has been based on a typical scenario.
139			High school parents are unable to enter the school grounds of an afternoon until after 3:30pm to pick up as the primary school children and parents have priority before this time. You only need to observe this one afternoon to see how difficult it is to pick up your child, observe the parents picking up on the school site, and surrounds and how congested the school entry and exits points are, and you want to add more activity to this site with extra parents, children and parishioners?	Concerns around existing drop off and pick up operations are acknowledged. It is important to note that as part of the proposed development, high school pick-up and drop-off activities will be relocated to the new multi-storey car park, alleviating congestion at the site's main entry. Together with operation of the OOSH, and strategies to reduce vehicle dependency, increase public transport use and make drop-off and pick-up operations more streamlined, modelling indicates that congestion at peak drop-off and pick-up times will be alleviated.
140			A similar proposal was imagined in Parramatta a few years ago, for St Patricks Primary School and the Cathedral, again on busy arterial roads, with the same traffic congestion and the difficulty parents have dropping off and picking up children with other schools and businesses in the vicinity. This proposal was objected, and you have now moved the same idea to Westmead.	The proposed development has been subject to detailed studies to determine the suitability of the site for the proposed development. The site is considered suitable for the development in terms of access, proximity to existing and proposed transport infrastructure, and providing education facilities in an identified growth precinct. The site's location provides opportunities to connect with, and be part of, the broader Westmead Health and Education Precinct.
141			I understand the growth in the area, as many areas are also growing in population and there is the need for another Catholic primary school, however, you should be looking at schools that are not located near hospitals, doctors, or specialist services, and are not on arterial roads. You should be looking at areas where you can expand the school as the population grows, areas that will allow and cope with school traffic, congestion and growth.	Refer to response above. The site is considered suitable for the development in terms of access, proximity to existing and proposed transport infrastructure, and providing education facilities in an identified growth precinct. The site's location provides opportunities to connect with, and be part of, the broader Westmead Health and Education Precinct.
142			You should be focusing and planning to expand Sacred Heart School on its current location to allow for the growth you are predicting and incorporate the Early Learning Centre on these grounds and give the current parish a renovation.	As outlined above in response to Item 19, the expansion and redevelopment of the Sacred Heart site is unfeasible.
143			This is away from the main arterial roads and congestion of the Westmead site, and would be welcomed by many.	The Sacred Heart site is small and constrained, and is located in a low density residential area which would be significantly impacted by issues such as traffic and overshadowing. The Sacred Heart site is not appropriate for redevelopment and expansion.

Item No	Name	Type	Issue	Response
144			The responsible planners for this proposal do not have children at these current schools, these planners do not drive to the location on a daily basis, nor do they understand the difficulty parents have getting their children to and from school daily.	The proposed development seeks to encourage public and active transport use rather than parents driving children to and from school. A Framework Travel Plan has been prepared to support this (refer to Appendix D).
145			Many parents are opposed to the Westmead Catholic Community proposal development, we will not stand for this and would hope you reconsider this at another location.	Noted.
146	Anon. 2	Objects	The traffic management plan doesn't account for the increased traffic from the planned high schools developments by year of stabilisation, either into the school or surrounding streets which are already very congested and at a standstill at pick up and drop off.	This application addresses the proposed population increase associated with the primary school redevelopment, as well as a small amount of background growth associated with the high schools to 2033. Any development to increase the capacity of the high schools would be subject to a future, separate application.
147			Minimal play areas and none in sunlight is not inline with health recommendations and a safety issue for primary aged children, in a high rise	The quantity and quality of open space is addressed above and in the covering Response to Submissions Report. The proposed design represents the best open space outcome for the school, as supported by independent research and CEDP's learning pedagogy.
148			There are numerous irregularities in the community engagement plan i.e. parents at the primary school had only 1 meeting with the Parramatta Catholic Education staff and were then directed to the website for comments, questions. The advisory committee including parents is on hold due to COVID 19.	An extensive period of consultation and ongoing engagement with the school communities and the local parish has been a feature of the WCC project. To-date, approximately 200 people attended the six community information sessions. The Advisory Panel made up of local community members has been established and to date has met on 3 occasions.