

Department of Planning and Environment
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Parramatta NSW 2124

Your Ref	SSD-43065987
Our Ref	NCA/10/2022
Contact	Paul Sartor
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5 December 2022

ATTN: Jenny Chu

COUNCIL SUBMISSION

**NOTICE OF EXHIBITION OF ENVIRONMENTAL IMPACT STATEMENT FOR THE
UPGRADES TO CARLINGFORD WEST PUBLIC SCHOOL AND CUMBERLAND HIGH
SCHOOL (59-73 FELTON RD AND 183 PENNANT HILLS RD, CARLINGFORD)**

The above application and the request to provide advice on the proponent's *Environmental Impact Statement* has been reviewed by the relevant staff. Council welcomes the changes made by the applicant since the previous proposal and has provided detailed commentary of the proposal in attachment 1 of this letter.

As summarised below, Council continues to have a number of concerns regarding the traffic impacts.

- The proposal includes insufficient onsite parking. This could be accepted if improved on-street parking was provided in surrounding streets.
- Whilst improvements have been made to the effectiveness of the kiss and ride facility, they are not sufficient to result in a meaningful improvement to congestion. Further commitments are required to improve the effectiveness of this facility further, including capping the number of parents that can use the facility.
- Proposed pedestrian facilities are welcome, however, changes are required to location to ensure maximum effectiveness.
- The current CTMP does not adequately manage the likely impact of construction working parking.

Given these concerns Council wishes to object to the proposal in its current form.

It is however, considered that these matters might be resolvable, and the Council would be happy to discuss this further with the applicant. To this end a series of conditions are provided at Attachment 2. Should the applicant be willing to accept these conditions, Council would consider removing its objection.

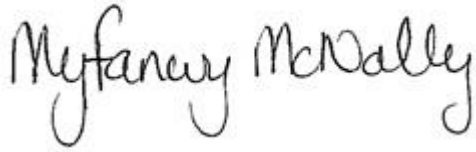
It is noted that this a Council officer submission not endorsed at a Council meeting. Council appreciates the opportunity to comment on the above application and the continued collaboration since the withdrawal of the previous application.

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Should you wish to discuss the above matters, please contact Paul Sartor on the details listed above.

Yours sincerely

A handwritten signature in black ink that reads "Myfanwy McNally". The script is cursive and fluid, with the first name "Myfanwy" and the surname "McNally" clearly legible.

Myfanwy McNally
MANAGER, CITY SIGNIFICANT DEVELOPMENT

Attachment 1 – Detailed Commentary

Traffic and Transport

The following comments are provided in relation to potential traffic impacts:

On Site Car Parking Rate

The applicant claims within the TIA that providing one space per employee would conflict with the strategy for the development, which seeks to reduce levels of private vehicle usage. This claim is refuted as this approach has had virtually no impact on current staff practices. Instead, a reduced rate for off-street parking is causing parking onto nearby local streets, which is impacting the residential amenity of the area. This shortfall and parking outcome would generally not be supported by Council for other land uses.

It is noted that as per the school travel survey results within the TAIA, up to 100% of staff at CWPS and up to 92.6% of staff at CHS drive to school. This will mean that for both schools combined, there can be a total of 108 vehicles parking on-street due to the limited capacity of the off-street car parks proposed for the development.

However, regard is given to the fact that the proposed car parking rate is an improvement to the existing conditions where up to 75% of staff are currently parking on-street. Furthermore, it is noted that the school travel plan will encourage staff to park along non-residential frontages such as at Kingsdene Oval. However, most of the streets near Kingsdene Oval are narrow and do not easily accommodate large volumes of parking.

While not preferred by Council, if the development is approved with the reduced parking rates, the Department of Education should contribute to improving on-street parking. This would involve construction of approximately 70m of parking bays on the east side of Arcadian Circuit and an approximately 80m bay on the north side of Sandringham Drive, as a small offset to the parking that it is generating in the local area. This would provide 20-25 spaces.

Car Parking Dimensions

The car park layout generally looks acceptable, although no dimensions are provided to confirm that it complies with the Australian Standards. This is to be conditioned.

Out of School Hours Care

The applicant should provide details on the OSHC capacity within their Response to Submissions, and a condition should be included for the operation of the OSHC including hours and limited capacity.

Kiss and Ride Provisions

The proposed works in Felton Road East and West are likely to provide road safety benefit. However, they only accommodate a small proportion of pick-up activity.

The proposed works in Felton Road West will require community consultation and approval through the Parramatta Traffic Committee process, conditions have been provided to this effect.

The kiss and ride facilities accommodate only a small proportion of pick up and set down activity. Most of the activity occurs in surrounding streets, which are generally narrow. This activity contributes to traffic congestion in the area at pick up times and results in complaints from local residents.

Traffic Generation

The provision of a new Link Road for CHS is likely to assist with the traffic flow for the Kiss and Ride facility.

There are known limitations with SIDRA modelling to accurately reflect school locations. This includes short bursts of high traffic and pedestrian volumes and driver behaviour at kiss and ride locations which can create a gridlock. For example, the SIDRA modelling shows that the intersection of Baker Street and Felton Street East performing at a satisfactory Level of Service despite on-site observation showing poor conditions. It is likely that this will be improved with the introduction of traffic signals at the intersection of Pennant Hills Road and Baker Street. However, queuing from the kiss and ride in Felton Street East and the pedestrian crossing at this intersection is a major contributor to the intersection's poor performance.

Regarding the Kiss and Ride facility in Felton Road East, it is noted that parents arrive early to queue prior to the school gates being opened resulting in queueing back into Baker Street and the roundabout being gridlocked. Furthermore, the limited capacity of the kiss and ride facilities is a significant contributor to general congestion on the area. The capacity of the Kiss and Ride facilities as detailed in the application is as follows:

- 112 student capacity from Felton Road East
- 127 student capacity from Felton Road West
- 112 student capacity from CHS Link Road

This is based on a turnover of 90 seconds for each platoon of vehicles.

This is a concern considering that the expected volumes for students being picked up at a kiss and ride facility will be 966 students for CWPS and 427 students for CHS based on the applicant's traffic study. This represents a large shortfall in the kiss and ride capacity.

The large proportion of vehicles turning left from Felton Street into Baker Street (eastbound to northbound) conflicts with the pedestrian crossing on the north side of the roundabout. There should be an increase in walking to parked cars, use of other transport modes, and peak spreading by use of the Out of School Hours Care facility to alleviate the queuing associated with kiss and ride.

However, this may not be enough to adequately reduce the queueing from kiss and ride. Therefore, the schools should manage the kiss and ride so that the number of parents that can use this facility does not exceed the capacity and result in excessive queueing. There should be a cap on the number of vehicles that can use each of the kiss and ride areas, with the number to be agreed by local Police and Council on a 6 monthly basis.

The schools should open the gates to the kiss and ride areas early so that early arrivals are moved on through the on-site areas back out on to the street where they are forced to join the back of the queue. This could supplement action taken by Council parking patrols (which require parent drivers to make 3 point turns in driveways). This could be done so queuing back into Baker Street does not occur.

Methods to reduce the turnover to less than 90 seconds for each platoon of vehicles should be explored. Conditions have been provided that require staff to be stationed at each kiss and ride facility and that some CWPS students can use the CHS kiss and ride facility and ensure that the school finishing times remain at least 25min apart.

It is to be reiterated the current traffic conditions in the area have been raised as a concern by the Hills Police Area Command who have reported that it takes a significant amount of time for their patrol vehicles to travel north in Baker Street between Pennant Hills Road and Felton Road. As such, any increases to the permanent capacity of the school must take appropriate steps to address congestion issues.

Proposed Pedestrian Facilities

The proposed raised pedestrian crossing at Tintern Avenue is Council's preferred treatment for this location. However, during the detail design stage, consideration will need to be given to the following:

- Limited sight distance from Pennant Hills Road turning into Tintern Avenue
- Fast turning angle from Pennant Hills Road into Tintern Avenue
- Potential for queuing and blocking of the intersection due to pedestrians at the crossing

The design of all traffic facilities must be to the satisfaction of Council and TfNSW and must include drainage design and lighting upgrades to ensure compliance with the relevant standards.

The proposed pedestrian crossing in Baker Street immediately north of Blenheim Street may not be the most suitable location for the crossing due to safety and traffic flow reasons. As such, the location of this crossing should be revised such that it is immediately south of Felton Road East. There are many pedestrians that already cross at this location and encouraging them to cross on the south side of the roundabout rather than the north side may reduce traffic congestion exiting the school.

Construction Traffic Management

Construction worker parking is a concern for the site considering that no provisions have been made within the site. As such, it is likely that construction workers will be parking on-street which will impact the residential amenity of the area and will restrict the space available for parents to park close to the school for pick up and drop offs. This may have a knock-on impact and increase congestion in the area.

The measures proposed by the interim CPTMP such as encouraging workers to use public transport is passive and is unlikely to have any meaningful impact. Accordingly, the CPTMP must consider suitable locations for designated construction worker parking either on-site or close to the site.

Construction vehicle access into the site is restricted due to the geometry of the roads leading up to the site. The CPTMP proposes to remove the landscaping in the roundabout at the intersection of Bettington Road and Felton Road and replace this with temporary warning signage.

The construction route should ensure that all construction vehicles can access the site without mounting any median islands or kerbs or crossing any centre linemarking. Traffic control may be required at some intersections to stop traffic to allow certain vehicles to safely travel through an intersection without damaging Council assets.

The applicant may wish to consider lodging an application with Council for temporary 'No Stopping' signage at certain intersections to improve manoeuvring space.

Strategic Transport

The following are to be considered further to ensure adequate pedestrian transport links:

- As per City of Paramatta's Bike Plan the northern side of Felton Rd has been identified as a cycling link and should have a 3.0m wide footpath adequate for a local connection. The provided architectural plans identify Felton Rd as having a 2.4m wide footpath only.

- The path along the eastern boundary connecting Blenheim to Felton East should be 3.0m wide to allow for shared use
- A 5m public access easement in Council's benefit is to be explored along the purple line at the below image. This should be conditioned within 5 years of OC at no cost to Council. This will increase connectivity and permeability between Blenheim St and Felton Rd West and East outside of school hours.



Figure 1 - Preferred alignment of the preferred public access easement

Catchment Engineering

A review of the stormwater plans has been undertaken and the following additional information is to be provided in the Response to Submissions for Council to be satisfied regarding the engineering impact of the proposal:

Flooding

- The flood modelling shows that no pipe blockage factor has been applied. In accordance with The Hills Council guidelines, a pipe blockage of 50% shall be applied to sag pits, and a 20% blockage factor shall be applied to on-grade pits.
- Aurecon must use Council's flood model, which can be obtained through a flood enquiry; the modified flood model provided by the WSP to Aurecon is not recommended.
- The site falls between H2 and H3 categories as per the flood report prepared by Aurecon dated 28/10/2022; H3 category definition is "unsafe for vehicles, children and the elderly. Flood risk mitigation measures shall be adopted and clarified on how the children from the school will be educated and made aware of the risk of flooding in the open playing fields.
- The increase in the flood levels in the neighbouring properties must be investigated and ensured that inundation to properties and Pennant Hills Road does not occur.
- The impacts of climate change should also be considered in the proposed design. According to ARR2019 guidelines, RCP (8.5) scenario, which is 20% increased rainfall (and not 9.5%), should be used, which may be a significant flood risk and must be addressed as per Council's LEP requirements.
- All structures (recreational spaces) to have flood-compatible building components below FPL3.
- The flood impact of the development to be considered to ensure that the development will not increase flood effects elsewhere, having regard to:
 - loss of flood storage;

- changes in flood levels and velocities caused by alterations to the flood conveyance, including the effects of fencing styles; and
 - the cumulative impact of multiple potential developments in the floodplain.
- A cut-and-fill plan shall be provided, and the survey of the site shall be used for the preparation of the flood modelling
- An electronic copy of the model shall be submitted to Council for assessment.

Stormwater

- As per the Council's drainage design standards section 5 of the Engineering Design Guidelines, the stormwater system should be designed for the 1% AEP storm event.
- The OSD volume must be clarified, as inconsistencies exist between the report and the stormwater plans.
- Details of the 6m wide swale must be provided for further assessment.
- All the OSD tanks must be located outside of the 1% AEP flood event to ensure the adequate functioning of the OSD system.
- The OSD tank must be designed for the development site areas
- The drains and MUSIC models files should be submitted to the Council for review.

Retaining Walls

If any earthworks are proposed, the following shall be provided:

- (a) A separate cut and fill plan.
- (b) All retaining walls that form part of this development shall be shown across all plans.
- (c) All retaining wall details including top of wall, bottom of wall, wall type, cross-section for all wall types.
- (d) The retaining walls shall be designed to ensure that natural flows from adjoining properties are not impeded or diverted.

City Strategy

- Council officers support the provision of open space that meets the requirements set by the Department of Education (10sqm per child) and request that this is secured via a condition of consent.
- Further details are to be provided in the Response to Submissions on how enrolment will be managed to ensure there is no further reduction of open space if enrolments exceed the current proposed maximum.
- Further details on the community use of school facilities are also to be provided. The provided Social Impact Assessment stated the following commitments:
 - "Engage with the City of Parramatta to investigate community use of the schools' social infrastructure outside operational hours, potentially including halls, meeting space and other indoor spaces." (p. 24)
 - "Engage with the City of Parramatta to investigate community use of the school's open spaces outside operational hours." (p. 24)
- Further clarity is to be provided to address what the applicant proposes will be shared or will likely be shared as stated above. The applicant should ensure that the early stages of design account for community use.

Accessibility

The provided Access Report in Appendix V has been reviewed and the following are requested to be provided by way of condition/s of consent:

- 1) Ensure continuous accessible paths of travel are provided from the accessible parking spaces provided to all the buildings they serve as per BCA D3.2.

- 2) Ensure continuous accessible paths of travel are provided between all the buildings required to be accessible as per BCA D3.2.
- 3) The areas of tiered seating throughout the proposal have no allowances for wheelchair seating as per *BCA Table D3.1 Requirements for access for people with a disability. Access requirements: To wheelchair seating spaces provided in accordance with D3.9 suitable seating areas are shown in AS1428.1 figures 54.*
- 4) All common areas of the school are required to be accessible as per ***BCA Table D3.1 Requirements for access for people with a disability. Access requirements: To and within all areas normally used by the occupants,*** therefore access is required to all the common areas including but not limited to the basketball courts, quads, northern and southern outdoor spaces and fields.
- 5) All areas where services are provided to the students including sign in areas canteens etc will require accessible features suitable for a transaction by a person that may have a mobility impairment.

To meet the intent of the DDA, provide a section at the reception/ sign in areas and counters for students and visitors with disabilities to carry out transactions. This will decrease the risk of non-compliance with the DDA. The accessible sections should have the following features to comply with AS1428.2 clause 24.

 - Minimum 800 mm length
 - Height from the finished floor to the top of the unit 850 ± 20mm,
 - Height of clearance beneath the unit from the finished floor 820 ± 20mm and
 - Overhang a minimum 620mm in depth

Ecology

The following condition is requested to be imposed on any development consent:

The mitigation and management measures outlined in Section 8 of the Biodiversity Development Assessment Report (BDAR) prepared by EcoLogical Australia, version 4, dated 26 October 2022 must be implemented prior to and during the demolition/construction process in accordance with the BDAR.

Reason: *To ensure biodiversity impacts are appropriately managed and mitigated*

Attachment 2 – Recommended traffic conditions

Prior to the release of a Construction Certificate:

- Parking spaces are to be provided in accordance with the approved plans and with AS 2890.1, AS 2890.2 and AS 2890.6. A total of 45 staff parking spaces are to be provided for Carlingford West Public School and 74 staff parking spaces for Cumberland High School. The PCA shall ascertain that any new element within the at-grade carpark not illustrated on the approved plans do not compromise appropriate manoeuvring and that compliance is maintained to the above listed standards. Details are to be illustrated on plans submitted with the construction certificate application.

Reason: To ensure appropriate vehicular manoeuvring is provided

- The applicant is to submit a separate application for any proposed line markings and signage including and proposed kiss and ride locations in the streets surrounding Carlingford West Public School and Carlingford High School to Council's Traffic and Transport Services for consideration by the Parramatta Traffic Committee under Delegated Authority and Council's approval. The construction of the approved treatment is to be carried out by the applicant and all costs associated with the supply and construction of the traffic facility and appropriate signage are to be paid for by the applicant at no cost to Council.

Reason: To comply with Roads Act 1993.

- Detailed engineering design plans are to be submitted to Council's Traffic and Transport manager for consideration by the Parramatta Traffic Committee and approval by Council of the following Traffic Facilities:
 - a) A new raised pedestrian crossing in Dunmore Avenue at Baker Street
 - b) A new raised pedestrian crossing in Blenheim Road at Baker Street
 - c) A new raised pedestrian crossing in Baker Street between Felton Road and Blenheim Road
 - d) A new pedestrian facility in Tintern Avenue at Pennant Hills Road
 - e) An approximately 70m long parking bay on the east side of Arcadian Circuit and an approximately 80m long parking bay on the north side of Sandringham Drive.

The construction of the approved facilities is to be in accordance with all relevant Australian Standards and Austroads Guidelines and are to include modification to the existing stormwater drainage infrastructure to Council's satisfaction and upgrades to the streetlighting to comply with the relevant Australian Standards. All works are to be carried out by the applicant and all costs associated with the supply and construction of the traffic facilities and appropriate signage are to be paid for by the applicant at no cost to Council.

Reason: To ensure pedestrian safety

During Construction or Works:

- Prior to the commencement of any works on site, the applicant shall submit a Construction and Pedestrian Traffic Management Plan (CPTMP) to the satisfaction of Council's Traffic and Transport Manager. The CPTMP shall be prepared by a suitably qualified and experienced traffic consultant. The following matters must be specifically addressed in the CPTMP:
 - a) Dedicated construction site entrances and exits, controlled by a certified traffic controller, to safely manage pedestrians and construction related vehicles in the frontage roadways,
 - b) Turning areas within the site for construction and spoil removal vehicles, allowing a forward entry and egress for all construction vehicles on the site,
 - c) The location of proposed Work Zones in the egress frontage roadways,
 - d) Location of any proposed crane standing areas,

- e) A dedicated unloading and loading point within the site for all construction vehicles, plant and deliveries,
- f) Material, plant and spoil bin storage areas within the site, where all materials are to be dropped off and collected,
- g) The provisions of an on-site parking area for employees, tradeperson and construction vehicles as far as possible. The CPTMP must not rely open existing on-street parking for construction worker parking as this will impact both the residential amenity of the area and can contribute to traffic congestion in the area by limiting the available parking for parents during school pick up times. As such, a designated area for construction vehicle parking must be provided.
- h) A detailed description and route map of the proposed route for vehicles involved in spoil removal, material delivery and machine floatage and a copy of this route is to be made available to all contractors,
- i) A detailed description of locations that will be used for layover for trucks waiting to access the construction site,
- j) Proposed construction hours,
- k) Estimated number and type of construction vehicle movements including morning and afternoon peak and off peak movements,
- l) Construction program that references peak construction activities and proposed construction 'Staging',
- m) Any potential impact to general traffic, cyclists, pedestrians and bus services within the vicinity of the site from construction vehicles during the construction of the proposed works,
- n) Measures proposed to mitigate any associated general traffic, public transport, pedestrian and cyclist impacts should be clearly identified, and,
- o) The plan may be required to include restrictions on the number of trucks that can access the site in peak hours and a requirement for the developer to provide video footage of the frontage of the site on a weekly basis so that Council can enforce this requirement,
- p) Evidence of Roads and Maritime Services concurrence where construction access is provided directly or within 20 m of an Arterial Road if applicable,
- q) A schedule of site inductions on regular occasions and as determined necessary to ensure all new employees are aware of the construction management obligations,

The CPTMP is to include the provision of a sign on the hoarding that provides a phone number and email address for members of the local community to make enquires or complaints regarding traffic control for the site. The construction company for the site is to provide a representative for meetings that may occur once a month and may include representatives of the local community and Council staff to discuss traffic control at the site.

Written concurrence from Council's Traffic and Transport Services in relation to installation of a proposed 'Work Zone' restriction in the egress frontage roadways of the development site. Application fees and kerbside charges for 6 months (minimum) are to be paid in advance in accordance with the Council's Fees and Charges. The 'Work Zone' restriction is to be installed by Council once the applicant notifies Council in writing of the commencement date (subject to approval through Parramatta Traffic Committee processes). Unused fees for kerbside charges are to be refunded once a written request to remove the restriction is received by Council.

All traffic control devices installed in the road reserve shall be in accordance with the NSW Transport Roads and Maritime Services publication 'Traffic Control Worksite Manual' and be designed by a person licensed to do so (minimum RMS 'red card')

qualification). The main stages of the development requiring specific construction management measures are to be identified and specific traffic control measures identified for each.

Approval shall be obtained from City of Parramatta Council for any temporary road closure or crane use from public property.

Reason: To ensure the appropriate measures have been considered during all phases of the construction process in a manner that maintains the environmental amenity and ensures the ongoing safety and protection of people.

During Construction or Works:

- Occupation of any part of the footpath or road at or above (carrying out work, storage of building materials and the like) during construction of the development shall require a Road Occupancy Permit from Council. The applicant is to be required to submit an application for a Road Occupancy Permit through Council's Traffic and Transport Services, prior to carrying out the construction/restoration works.

Reason: To ensure proper management of Council assets.

- Oversize vehicles using local roads require approval from the National Heavy Vehicle Regulator (NHVR). The applicant is required to submit an application for an Oversize Vehicle Access Permit through NHVR's portal (www.nhvr.gov.au/about-us/nhvr-portal), prior to driving oversize vehicles through local roads within the City of Parramatta LGA.

Reason: To ensure maintenance of Council's assets.

Use of the Site:

- One year from the issue of the Completion Certificate, and every year for 2 years thereafter, the applicant shall submit to the satisfaction of Council's Manager Development & Traffic Services a review report on the effectiveness of the School Travel Plan. The reviews shall include surveys of modal share and vehicle trip generation for the various land uses within the development during peak and off-peak periods. The review shall also include any recommendations for improving the effectiveness of the plan. Any recommendations made to improve the effectiveness of the plan shall be incorporated into an updated School Travel Plan.

Reason: To ensure the effective management of the Green Travel Plan.

- Both Carlingford West Public School and Cumberland High School must take appropriate steps to limit local area traffic congestion and to ensure the smooth flow of traffic in surrounding streets. These must include but not be limited to the following:
 - a. Carlingford West Public School and Cumberland High School must have staggered finishing times not less than 25 minutes apart.
 - b. Staff at both Carlingford West Public School and Cumberland High School must supervise and manage the three Kiss and Ride areas listed below:
 - i. Felton Road East
 - ii. Felton Road West
 - iii. New Link Road between Dunmore Avenue and Blenheim Road

Students at Carlingford West Public School are to be permitted to use the kiss and ride facility in the New Link Road (numbers as per part (c)) with staff from this school to supervise the crossing when used by primary school students. The school is to manage the on-site kiss and ride so that only registered approved students and vehicles can use the kiss and ride so that volumes are managed.

- c. The number of vehicles that can use each of the three kiss and ride locations listed in point (b) must be capped, with the maximum number to be agreed to with City of Parramatta Council's Traffic and Transport Manager on a six monthly basis.
- d. The school gates in Felton Road East are to be opened up to 30 minutes before the Carlingford West Public School finishing times when requested by Council Parking Patrol Officers so that parents that arrive at the kiss and ride locations early can move on through the site and go back out on to the street where they are to join the back of the queue.
- e. Out of School Hours Care is to be made provided at Carlingford West Public School during the hours of 7am – 8:55am and 3:25pm - 6:00pm Monday to Friday. The Out of School Hours Care capacity is to be provided is to be a minimum of 15% of the primary school enrolment.

Reason: To manage traffic congestion in the area.