

17 May 2022

NSW Department of Planning and Environment  
4 Parramatta Square 12 Darcy Street,  
PARRAMATTA NSW 2150

## RE: SEARs REQUEST SCOPING LETTER

This Scoping Letter has been prepared by GYDE Consulting on behalf of School Infrastructure NSW (SINSW). It accompanies a request for Standard Secretary's Environmental Assessment Requirements (SEARs) for the preparation of an Environmental Impact Statement (EIS) for a State Significant Development Application (SSDA) on the site. The application is for alterations and additions to the existing Carlingford West Public School (CWPS) and Cumberland High School (CHS) located at 59-73 Felton Road and 183 Pennant Hills Road, Carlingford, respectively.

This report is accompanied by preliminary scoping plans prepared by Woods Bagot Architects (at Attachment A).

## 1. SITE AND LOCALITY DESCRIPTION

The site has a street address of 59-73 Felton Road and 183 Pennant Hills Road, Carlingford. An aerial view of the site is provided below in Figure 1. CWPS is located in the northern part of the site and CHS is located in the southern part towards Pennant Hills Road.



Figure 1: Aerial Image of the Site, site outlined red (Source: Nearmap May 2022)

The site is located within the Parramatta Council Local Government Area (LGA). It is located approximately 20 km north west of the Sydney central business district (CBD) and 4.5km north east of Parramatta CBD. The regional context of the site is shown in Figure 2.

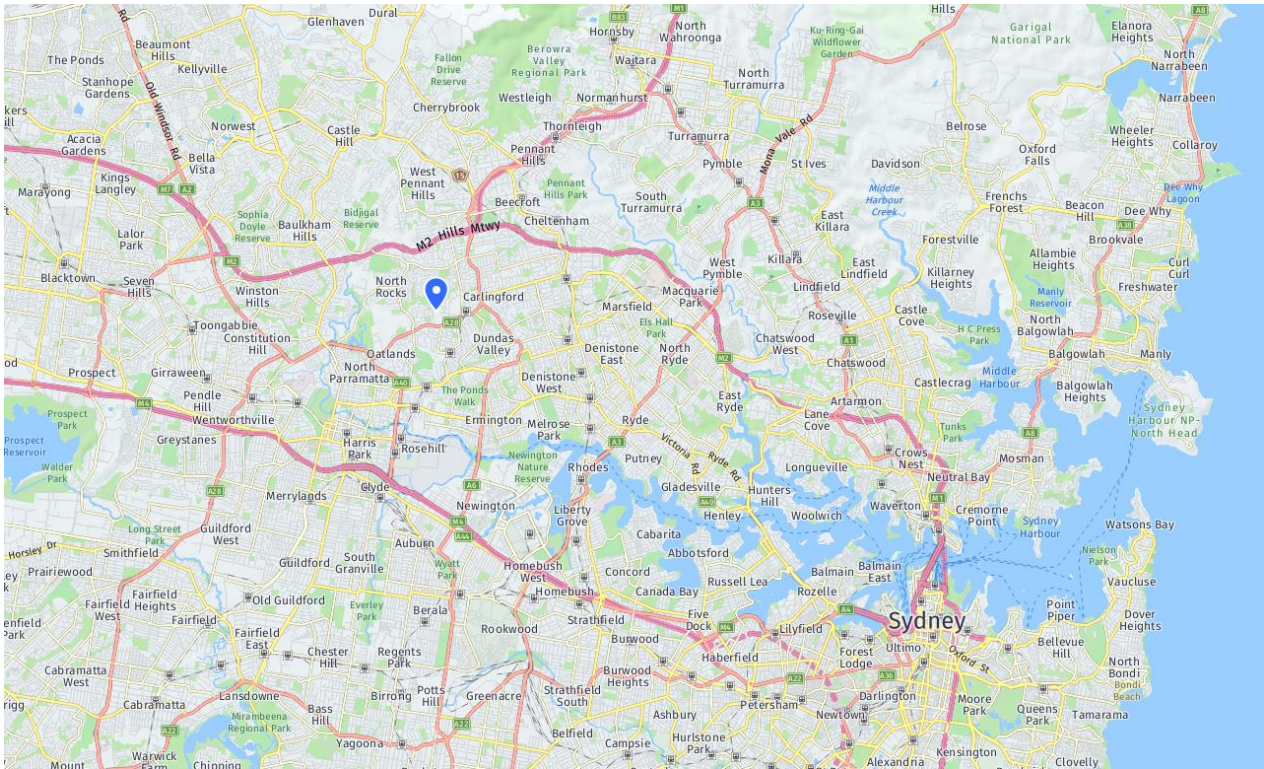


Figure 2: Regional Context Map, site marked by blue marker (Source: Nearmap May 2022)

The site is predominantly surrounded by low density residential dwellings and has various access points from surrounding streets including Felton Road East and West, Pennant Hills Road and Dunmore Avenue.

## 2. PROPOSAL DESCRIPTION

The proposed works across the site involve upgrades to CWPS and CHS as follows:

### CWPS upgrades to cater for a total student population of 1,610:

- Construction of three (3) new buildings in the north west portion of the site:
  - Building Y is proposed to be two (2) storeys and contain homebases.
  - Building X will be (3) storeys and the ground floor will contain a new library and special programs. The two levels above will contain homebases.
  - Building Z will be four (4) storeys. The lower ground floor of building Z will contain the waste storage and collection area. The ground floor of building Z will contain a new canteen, OSHC and hall. The remainder of the building will contain homebases, staff areas and amenities.

### CHS upgrades to cater for a student population of 2,040 students:

- Construction of three (3) new buildings in the south east portion of the site:
  - Building Z is a one (1) storey double height building containing the new gym, stage, changerooms, canteen and lecture theatre.
  - Building Y is proposed to be five (5) storeys and contain movement, fitness, woodwork rooms, visual art, multi media and performing arts rooms. A new library, staff areas and additional homebases are also proposed.
  - Building X is proposed to be four (4) storeys and contain admin areas, general learning hubs, multimedia room and storage.

As well as associated landscaping and civil works across the site.

A decanting strategy will be included with the SSDA which allows for the relocation of various school functions into demountables to facilitate refurbishment and construction. The construction of the new buildings will utilise Design for Manufacture and Assembly (DfMA) which is a design and construction process where building components are manufactured in a factory environment, with modules delivered to site for assembly.

The following early works on site will fall under a separate approval pathway to the SSDA:

- CWPS:
  - Demolition of existing buildings C and J will form part of the early works.
  - Building A and B are proposed to be refurbished for administration spaces.
  - Relocation of temporary demountables.
  - All temporary school setup and commissioning will be completed by the early works contractor as part of the early works.
  - The future appointed main works contractor will decommission services and temporary demountables to allow for them to be removed off site by others at the end of the project, with make good of the school oval once demountables are removed to be completed by the main works contractor shortly thereafter.
- CHS:
  - Demolition of existing buildings C, B and F will form part of the early works.
  - Buildings E, A, D and G are existing buildings proposed to be retained and refurbished in selected areas.
  - Relocation of temporary demountables.
  - All temporary school setup and commissioning will be completed by the early works contractor as part of the early works.
  - The main works contractor will decommission the services and temporary demountables to allow for them to be removed off site by others at the end of the project, with make good of the area to be completed by the main works contractor shortly thereafter.

An extract of the proposed Masterplan is provided in Figure 3.



Figure 3: Proposed Masterplan (Source: Woods Bagot 13 May 2022)\*

\*Note: CWPS carpark location is indicative only and may be subject to change

The traffic and transport works proposed as part of the SSDA include:

- A new kiss & ride zone at Felton Road West for CWPS.
- New active transport facilities including bicycle storage and end-of-trip facilities for staff.
- New staff car parking for the primary school accessed via Felton Road West.
- Improvements to internal pedestrian connections such as footpaths and cycleways.
- Improvements to the existing kiss & Ride zone at Felton Road East.
- Associated external infrastructure works to accommodate the proposal, such as pedestrian crossings.
- Identification of a potential corridor for a future community shared path between Felton Road East and West (not to be constructed as part of this SSDA).

The proposed CHS access point will be via a new link road at the east boundary which will run clockwise from Dunmore Avenue heading north and exiting from Blenheim Road, a new kiss and ride, pedestrian path and car park is proposed in this area. A new through-site bus link will also be constructed between Dunmore Avenue and

Pennant Hills Road for CHS. It is noted that the link road from Dunmore Avenue to Blenheim Road and the bus link do not form part of the SSDA scope of works and will be approved via another planning pathway (anticipated to form part of a Review of Environmental Factors (REF)). Notwithstanding, the future link roads are shown on the overall Site Access Masterplan ( Figure 4) to understand the overall future access arrangement on the site and how different components connect.



Figure 4: Site Access Plan (Source: Woods Bagot May 2022)

### 3. STATUTORY FRAMEWORK

Schedule 1 Part 15(b) of the State Environmental Planning Policy (Planning Systems) 2022 provides that development for the purposes of the erection of a building, or alterations or additions to an existing building, at an existing school that has a capital investment value (CIV) of more than \$50 million is state significant development. The CIV for the proposed scope of works is greater than \$50 million and therefore a state significant development application to the Department of Planning and Environment is required.

All applicable environmental planning controls will be addressed in the EIS to accompany the SSDA. For the purposes of this Scoping Letter, we have undertaken a preliminary assessment of the proposal against the key provisions of Chapter 3 of the State Environmental Planning Policy (Transport and Infrastructure) 2021 (T&I SEPP), Parramatta (former The Hills) Local Environmental Plan 2012 (LEP 2012) and The Hills Development Control Plan 2012 (DCP 2012).

A summary of compliance with the relevant development controls is provided below.

#### T & I SEPP 2021 – Chapter 3 Educational Establishments and Childcare Facilities

This policy aims to facilitate the effective delivery of educational establishments and early education care facilities throughout NSW. This policy enables schools, child-care establishments, TAFE’s and Universities to development new facilities and undertake alterations and additions through a streamlining process.

Chapter 3 of this policy relates to educational establishments (schools) and sets out the works that may be carried out as development permitted with consent, development permitted without consent, exempt development and complying development.

Part 3.43 of the T & I SEPP provides that development consent may be granted for development for the purpose of a school that is State significant development even though the development would contravene a development standard imposed by this or any other environmental planning instrument under which the consent is granted. As noted below, the proposed scope of works is anticipated to contravene the height of building standard for the site under the LEP 2012.

#### 4.2 Parramatta (former The Hills) Local Environmental Plan 2012

##### Land Use and Permissibility

Pursuant to the LEP 2012 the site is zoned R2 Low Density Residential. An extract of the land zoning map is provided in Figure 5.

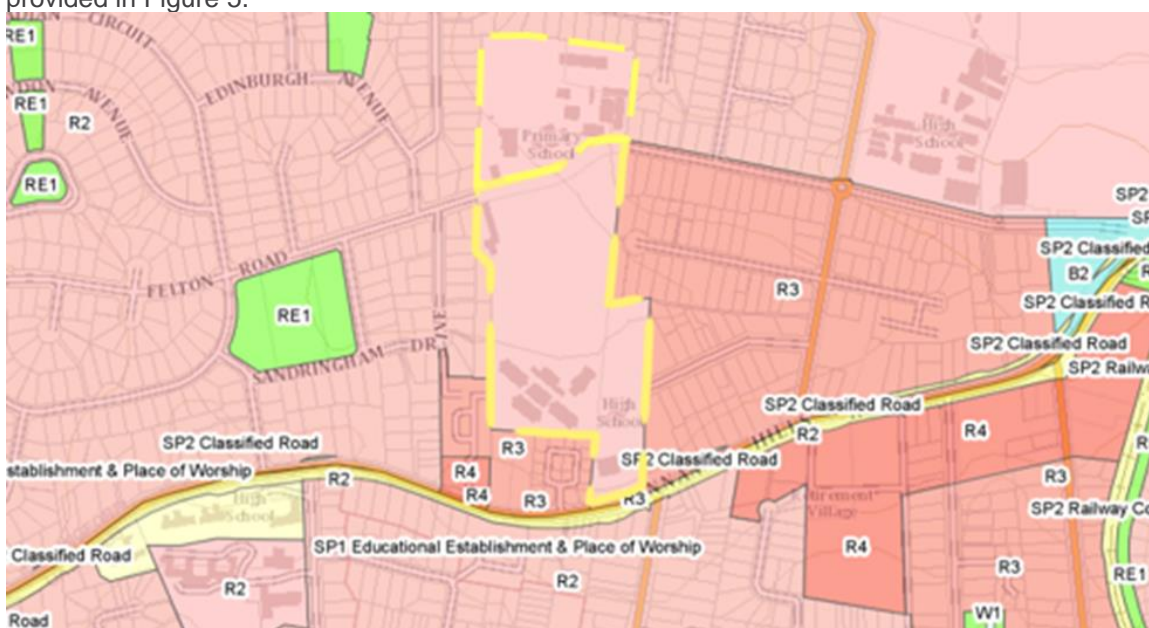


Figure 5: Land Zoning Map, site outlined yellow (Source: NSW eplanning Portal)

The proposal is for alterations and additions to an 'educational establishment' which is defined in the LEP 2012 as follows:

**educational establishment** means a building or place used for education (including teaching), being—

(a) a school, or

(b) a tertiary institution, including a university or a TAFE establishment, that provides formal education and is constituted by or under an Act.

As per the R2 Land Use Table in the LEP 2012, educational establishments are not nominated as a prohibited use and are therefore permitted with consent in the R2 Zone.

Table 1: LEP 2012

Relevant Control	Response	Complies?
4.3 Height of buildings	The maximum height permissible on the site is 9m. It is anticipated proposed buildings will exceed the 9m height standard. However, these buildings have been positioned on the school grounds to reduce shadows on surrounding developments and minimise privacy impacts. Further, buildings of the size proposed are necessary to accommodate the growth of the schools without reducing the quantity of landscaped area. Detailed justification will be provided as part of the SSDA submission.	No
4.4 Floor Space Ratio	The site is not subject to a maximum FSR under the LEP.	N/A
6.1 Acid Sulfate Soils	The site is not mapped as containing Acid Sulfate Soils.	N/A
6.2 Earthworks	The proposed earthworks require consent. Earthworks plans will be prepared for the SSDA lodgement.	Yes

### Key assessment issues

The key environmental and planning issues that will need to be considered in the EIS are summarised below:

#### Traffic and parking

The campus has limited site access which is restricted by the property boundaries. The site has frontages to three cul-de-sacs (at Felton Road East, Felton Road West, and Dunmore Avenue), two pedestrian links (Hilar Avenue and Blenheim Road), and a 70m frontage to Pennant Hills Road. Pedestrian access gates are currently provided at all six of these frontages. Kiss & ride zones (with signposted 'No Parking' restrictions) are available at the three cul-de-sacs and two pedestrian links, including on-site kiss & ride zones for the primary school within the boundary at Felton Road East and for the high school within the boundary at Dunmore Avenue.

Bus services operate directly to the high school at Dunmore Avenue, with bus shelters provided. The primary school has an existing permanent car parking capacity of approximately 30 spaces, although this capacity has been reduced since mid-2020 due to installation of demountable classrooms. The high school has an existing permanent capacity of approximately 65 spaces to the south side of the main buildings (though these are largely non-compliant with current design standards), plus approximately 30 temporary spaces to the north side of the tennis courts which are used intermittently (currently the CWPS contractor's construction site compound).

The local precinct currently experiences congestion issues during the morning and afternoon school travel periods, due to a combination of factors including the combined activity of three schools (CWPS, CHS, and James Ruse Agricultural High School), uncontrolled vehicle movements with long delays at Pennant Hills Road, two-way vehicle movements on narrow local streets, and continuous pedestrian movements at zebra crossings, compounded by high proportions of kiss & ride activity to the schools.

Upcoming external works by others include the signalisation of the intersection of Pennant Hills Road and Baker Street under a Voluntary Planning Agreement for the BaptistCare site at 264 Pennant Hills Road, and the provision of raised zebra crossings by Council at Felton Road East (east of Baker Street) and Karingal Avenue (north of Felton Road East) under a federal stimulus package. These works are expected to be complete before the opening of the proposed new facilities at the schools.

The impacts of the development will be assessed and presented in a Transport and Accessibility Impact Assessment for the proposed works. Included in this document will be preliminary copies of a School Transport Plan and Construction Traffic Management Plan. The transport infrastructure and management requirements for the site (including external services by others such as bus operations) will be determined through consultation with City of Parramatta Council and Transport for NSW through an established Transport Working Group.

### **Design**

An Architectural Design Report will be prepared to accompany the SSDA. The assessment of the architectural quality and built form will focus on the height, scale and setbacks. It will also include consideration of the Design Quality Principles outlined in Schedule 8 of the T & I SEPP. During the master planning for the site, consideration has been given to the siting of the new buildings which are setback from the site boundaries to minimise amenity impacts on the surrounding low density residential dwellings.

### **Protecting Amenity**

The site is located within a residential area. Design development will consider this context and the EIS and SSDA lodgement package will address the visual, noise and privacy impacts to the residential dwellings within the vicinity of the site. Further, the importance of tree canopy coverage on the site to local amenity is recognised and we will be endeavouring to maintain and enhance landscaped areas on site.

### **School Operations**

The proposed upgrades to both schools seeks to balance student and site capacity to deliver educational outcomes while also protecting amenity.

### **Flooding and Drainage**

A detailed Flood Impact Assessment and Stormwater Plans will be provided as part of the SSDA lodgement package.

### **Construction Impacts**

A Construction Management Plan and Construction Traffic Management Plan will be submitted with the SSDA which will give careful consideration to the planning and management of the construction period and minimising impacts.

## **4. CONCLUSION**

We trust that the information contained within this letter will provide the Department with the relevant information to issue SEARs for the proposal.

If you have any queries or require clarification on any matters relating to the proposed development, please do not hesitate to contact Elyse Kenny, Senior Project Planner, or the undersigned on 9068 7500.

Yours sincerely,



**Mark Schofield**  
Director