

6 August 2021

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

Architecture
Urban Design
Planning
Interior Architecture

To: Jason Maslen
Team Leader, School Infrastructure Assessments

Pendle Hill High School Upgrade, SSD-9579147
Response to Submissions Addendum 2

Dear Jason,

This Response to Submissions (RTS) addendum has been prepared by Architectus Australia Pty Ltd on behalf of School Infrastructure NSW (the Applicant) for State Significant Development Application (SSDA) No. 9579147 for the Pendle Hill High School redevelopment located at 66 Binalong Road, Toongabbie (the site).

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The SSDA was publicly exhibited from 12 May 2021 to 8 June 2021. During this period, seven (7) government and public authority submissions were received, along with an Issues Letter provided by the NSW Department of Planning, Industry and Environment (DPIE). A detailed RTS package was lodged on 5 July 2021, with an addendum (RTS Addendum 1) addressing Endeavour Energy's comments submitted 26 July 2021

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This further RTS addendum (RTS Addendum 2) seeks to address additional matters raised by DPIE in their letter dated 29 July 2021 requesting a response to matters raised by City of Parramatta Council (Council), in relation to open space, the use of demountables and traffic and transport conditions of consent. A response to each item is provided below, with a further detailed response to traffic and transport matters provided at **Attachment A**.

1. Response to Open Space

In relation to open space at the school, Council provided the following comment:

Council Comment: *"It is the opinion of Council's Open Space Team that the improvement of the existing hard courts and playgrounds should be considered further by the applicant. These open spaces do not appear to have been substantially upgraded since the schools development in the 1970's. Council would encourage the applicant to reconsider the scope of the proposed development to allow for the activation of the other open spaces in the school grounds to meet the new student demand. It is accepted that additional shading over the hardcourts area and shading over passive areas have been somewhat addressed by the applicant previously."*

Response: As noted previously, upgrade works to some of the play areas at the school were recently completed in March 2021) including resurfacing of two of the hard courts, as well as the erection of three shade sails immediately to the south of building F. The upgrade works were intended to provide additional amenity to students and to foster a sense of community and inclusiveness, as the shade sails are the colours of the Aboriginal flag (red, black and yellow) to celebrate and give a visual connection to the local Aboriginal culture and heritage of the community, especially given there are a number of Aboriginal students who attend the school. Refer to an overview of these works at **Figures 1 and 2** below.

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Figure 1 – Aerial image of the school prior to the open space upgrades, December 2020.
 Source: Metromap



Figure 2 – Aerial image of the school after open space upgrades, April 2021.
 Source: Metromap.

As detailed within the RTS, these works will complement further upgrade works proposed under the SSDA, including:

- The main roof of the proposed building provides shading to the central courtyard spaces;
- The link roof provided between building H and the existing buildings provide shade to the pedestrian paths as well as to the turfed areas to the south;
- The form of Building H provides shading to the playing fields to the South of the building;
- Outdoor seats with shade umbrellas are provided to the courtyard to the West of Building E; and
- The trees and extensive proposed landscaping to be provided to the outdoor spaces.

When considered on a site-wide basis, these measures are considered appropriate and will complement existing areas of shading across the site. Remaining areas of hard stand play space at the site other than those described above include the central assembly area (between buildings A/B/C/D/E) as well as hard courts located to the north of buildings B and E. Both of these areas are in good condition, are fully functional and fit for purpose and therefore do not

require further upgrade at this time. It is also noted that the central assembly area was subject to shade cloth upgrades in 2019.

Remaining areas of open space at the site comprise soft landscaping, which is noted as a key strength of the school site. Having regard to the above, further embellishment works beyond the current School Community Group (SCG) program are not considered to be required at this time, however the potential for any further upgrade works will be continually reviewed by School Infrastructure NSW as part of the existing asset management program as the student population at the school and within the catchment grows. School Infrastructure NSW will continue to work with the school to deliver maintenance and enhancement priorities and will continue to review opportunities for future site improvements as required.

2. Response to use of demountables and planning for future growth

Council also provided comments relating to the use of demountables at the school, including potential impacts to open space and overflow pressure on Council areas of open space. It is noted that no demountables are sought as part of this SSDA application, however that demountables will be used during construction and these have been separately approved as complying development.

Council's comments and our responses are provided below:

Council Comment: *"Council considers that the development of a school to meet the current school catchment numbers is somewhat short sighted of School Infrastructure NSW and would encourage that the development of the school meets the future needs of the Pendle Hill High School. As noted in the response table the school already has utilised four demountables as a short-term solution and would not accept any condition of consent that seeks to limit the use of more demountables on the schools open space."*

Response (Demountables)

The applicant's position on demountables has not changed. Demountables are a short-term solution and are not relied upon to meet the long-term needs of the SCG. The use of temporary portable classroom buildings is an essential short-term tool to allow for school operations to continue during construction and the broader redevelopment of the site. Without demountables, works would be disruptive to normal school programming.

Finally, a condition of consent precluding the installation of demountables would be inconsistent with existing provisions within the State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017 (ESEPP), which allows for the provision of demountables as exempt development. As detailed within the RTS, School Infrastructure NSW do not agree to Council Officers recommendation for a condition of consent that would restrict the potential for use of demountables on site.

Response (Planning for future growth)

In relation to planning for the future needs of the Parramatta SCG, the NSW Department of Education considers a range of factors to determine the likely future demand for student enrolments. These factors include reviewing long term trends in population growth, the predicted uptake of new housing by those with school aged children, the ratio of government and non-government school attendance, as well as the size and location of existing schools.

The Department undertakes school planning to better understand where and when additional school provision is required and where the school population is likely to remain stable or decline and uses this data to determine the most appropriate school asset solutions.

Demand for future school infrastructure is assessed on a relative-needs basis across the state. At any given time, there is a finite amount of education funds and a need to optimise the distribution of these funds. In cases of sustained enrolment increases that are unable to be met

through expanded facilities, additional permanent facilities are delivered, or new schools are built to support this growth, having regard to the context and prioritisation of needs across the state.

Notwithstanding, there has been significant school infrastructure investment within the Parramatta LGA and surrounding areas in recent years, including the following upgrade and redevelopment works:

- An upgraded Parramatta Public School;
- An upgraded Parramatta West Public School;
- Establishment of the new Bayanami Public School, Parramatta;
- An upgraded Rosehill Public School;
- An upgraded Epping Public School;
- An upgraded Carlingford Public School;
- The new Arthur Philip High School, Parramatta; and
- The new Kindergarten to Year 12 Rydalmere Education Campus.

Planning is also underway for a number of other school projects within the region and the NSW Department of Education will continue to monitor the growth in the Parramatta LGA and the SCG to ensure appropriate educational infrastructure is provided. The NSW Department of Education will continue to collaborate with DPIE, Parramatta Council and other local Councils to deliver positive outcomes across the State.

Council Comment: *“While it is acknowledged that the school’s redevelopment will seek to reduce the need of any demountables in the near future by allowing up to 500 more students to be enrolled within the permanent facilities we would still strongly recommend that DPIE places a condition of consent that any future demountables cannot reduce the open space per student below 15sqm, nor utilise Council sportsgrounds to meet the curriculum requirements for physical activity as a result.”*

Response: With regard to open space, the school currently has 62,260m² of open space, and will provide for 60,860m² open space post-development. This equates to a rate of 46.1m² open space per student post development. When considered against the maximum future potential scenario (up to 2,040 students, noting this is not the subject of this SSDA), this would result in 29.8m² open space per student.

This is considered to be a significant amount of open space and is almost double the 15m² per student proposed lower limit noted by Council. In a scenario where demountables were required, they would only be used temporarily and so it is considered highly unlikely that a reduction in play space to this extent would ever occur.

Under both pre and post development scenarios, the proposal exceeds minimum requirements within the NSW Department of Education’s School Assets Strategic Plan, which requires a minimum of 10m² outdoor play space per student. The proposed development as sought under this SSDA is therefore consistent with both Department of Education Guidelines and Northern Sydney Local Health District research provided by Council in their submission. Given the significant provision of open space at the site, a condition of consent as suggested by Council is not supported.

3. Response to traffic conditions of consent

Council has responded to the applicant's proposed re-wording of three conditions of consent relating to transport matters. School Infrastructure NSW accepts some but not all of their proposed changes. A detailed response to these conditions of consent is provided at **Attachment A**.

In relation to the proposed rate of car parking, Council's comment requesting a parking rate of 0.85 per staff member is acknowledged but is not supported. The proposed rate of 0.55 spaces per staff member (a total of 57 car parking spaces) is consistent with the sustainable transport strategy for the site and the mode hierarchy adopted by Transport for NSW, both of which deprioritise private car travel in favor of more sustainable modes. Parking provided on site will be accompanied by external infrastructure improvements, as described within the EIS and RTS.

As detailed within the RTS and supporting Transport and Accessibility Impact Assessment (TAIA), prepared by TTW, through the conditions of consent, Pendle Hill High School will be preparing a School Transport Plan (STP) designed to increase active and sustainable transport use by staff and students. This will further decrease the demand for on-site parking over the long term and is consistent with the Transport for NSW policy to encourage sustainable mode shift.

Further, it is noted that a car parking rate of 0.5 spaces per staff member is the adopted rate in surrounding Auburn, Ryde and Cumberland (former Holroyd) LGAs, and whilst City of Parramatta Council does not have a suggested parking rate for schools, the proposed rate of 0.55 spaces per staff member is consistent with what is occurring in the broader area and is therefore considered acceptable for the site.

4. Conclusion

We trust that this information is sufficient to assist DPIE's assessment of the proposed development. Should you have any queries about this matter, please do not hesitate to contact Jonathan Archibald at jonathan.archibald@architectus.com.au.

Yours sincerely,



Jane Fielding
Senior Associate, Planning
Architectus Australia Pty Ltd

Attachment A: Detailed response to transport conditions of consent as suggested by Council.

Council comment	Applicant response
<p>Transport and Traffic</p> <p><i>The response to Traffic and Transport conditions generally relates to minor changes to the wording. Some changes would leave the conditions too vague and is therefore not supported. The applicant has not provided any new information regarding the proposed parking rate, with no significant new information provided in this response as already noted in our previous comments.</i></p> <p><i>Based on this, we would like to reiterate the following concerns raised in our original response to DPIE:</i></p>	<p>See responses below.</p>
<p>Car Parking Rate</p> <p><i>It is noted that a revised TAIA has been submitted as Attachment I. However, there is no significant new information which would alter Council's previous comments regarding the proposed parking rate. Accordingly, Council still recommends that the proposed development use a parking rate of 0.85 spaces per staff to reflect the findings of the staff survey.</i></p> <p><i>However, the condition of consent regarding parking spaces and car park design can omit the maximum number of spaces required by the development and be changed to the following:</i></p> <ul style="list-style-type: none"> <i>– Parking spaces are to be provided in accordance with the approved plans and with AS 2890.1, AS 2890.2 and AS 2890.6. The spaces affected by the reduced aisle width within the northern most parking module are to be marked as Small Car Spaces.</i> <p><i>Reason: To comply with the Australian Standards.</i></p>	<p>No changes are proposed to the number of car spaces proposed, which is 57 car parking spaces as explained in the letter above.</p> <p>The wording relating to compliance with Australian Standards is accepted. Therefore, the following revised wording is suggested:</p> <ul style="list-style-type: none"> <i>– Prior to the issue 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 AS2890.6. A total of 57 parking spaces is to be provided with the spaces affected by the reduced aisle width within the northern most parking module to be marked as Small Car Spaces.</i>
<p>Condition regarding signs and line marking</p> <p><i>The condition can be revised such that the signs and line marking plan is required prior to operation of the proposed development. However, the rest of the wording of the condition proposed by Council is recommended to be retained. It is noted that the applicant is proposing modifications to the bus bay as well which will need to be reviewed by Council and is captured by Council's proposed condition.</i></p>	<p>Noted and accepted. The proposed condition wording is as follows:</p> <ul style="list-style-type: none"> Kiss and Ride signage and line marking <p><i>Prior to occupation, the applicant is to submit a separate application for the proposed line marking and signage for the proposed Kiss and Ride spaces near the school as well as the modifications to the bus bay in Binalong Road to Council's Traffic and Transport Services for</i></p>

Council comment	Applicant response
	<p><i>consideration by the Parramatta Traffic Committee under Delegated Authority for 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 works and appropriate signage are to be paid for by the applicant at no cost to Council.</i></p>
<p><u><i>Condition regarding traffic facilities</i></u> <i>As Council will be doing the raised pedestrian crossing in Binalong Road at the northern side of the school, this item can be removed from the condition. The remaining condition is to remain unchanged as the alternative condition does not capture all of Council's requirements for the condition in that it does not specify traffic committee approval and what traffic facilities that are to be constructed. The costs for the proposed works are also left vague.</i></p>	<p>This item is accepted, however with some amendments to Council's previous suggested wording to require this condition prior to occupation, instead of prior to construction certificate, given these works would not need to be finalised prior to commencement of construction and may need to be scheduled during school holiday periods which would impede the construction program.</p> <p>The revised wording of the condition proposed by the applicant:</p> <ul style="list-style-type: none"> – <i>Prior to occupation, detailed engineering design plans of the proposed raised pedestrian crossings in the locations listed below are to be submitted to Council's Traffic and Transport Manager for consideration by the Parramatta Traffic Committee and approval by Council:</i> – <i>Binalong Road at the southern side of the school</i> – <i>Burrabogee Road near Knox Street</i> – <i>Bungaree Road north of Cornock Avenue</i> <p><i>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.</i></p>
<p><u><i>Green Travel Plan</i></u> <i>It is noted that there is a condition of consent suggested which would require the School Transport Plan to be submitted to the Planning Secretary. This plan is to be submitted to Council as well as per Council's proposed condition.</i></p>	<p>The proposed condition (noted in the RTS) includes a requirement that the STP be prepared in consultation with City of Parramatta Council and Transport for NSW. It is considered this will provide Council adequate opportunity to contribute to the outcome.</p> <p>No further amendments to the condition wording proposed by the applicant in the RTS are proposed.</p>