



18 October 2019

Mr Navdeep Shergill
A/Senior Planner
School Infrastructure Assessments
Department of Planning, Industry and Environment
GPO Box 39
Sydney NSW 2001

Dear Mr Shergill,

RE: Notice of Modification, Redevelopment of Parramatta Public and Arthur Phillip High Schools, 80-100 & 175 Macquarie Street, Parramatta, (SSD 7237 MOD 5)

Thank you for providing School Infrastructure NSW (SINSW) the submissions received in relation to the Modification Application to amend SSD 7237 in order to facilitate delivery of the project in stages according to established project timelines.

This Response to Submissions provides a detailed response to the following submissions received during the public notification period:

- City of Parramatta Council Letter, dated 3 September 2019, ref NCA/1/2016;
- Department of Premier and Cabinet Letter (as delegate of the NSW Heritage Council), dated 30 August 2019; and
- Transport for NSW Letter, dated 2 September 2019, reference CD19/06788.

The above submissions have been reviewed internally with the project team and we provide our comments (see **Attachment 1**) for your further review and consideration.

We further provide an updated staging plan for the project (see **Attachment 2**). The updated staging plan better reflects the temporary and permanent works which are proposed to occur as part of both the project and the Parramatta Light Rail development.

We further note that Parramatta City Council has provided in principal support to the proposed staging plan of SINSW.

Should you require anything further in regards to the matter please contact Cameron Nixon, Principal Planner School Infrastructure NSW to discuss the matter. Cameron can be contacted on 0439 558 922 or Cameron.nixon6@det.nsw.edu.au.

Yours sincerely,

Lachlan MacDonald
Senior Project Director

Attachment 1

Responses to City of Parramatta Council Letter, dated 3 September 2019, ref NCA/1/2016

SINSW ID.	Ref	Comment	Response
	A. MODIFICATION REPORT		
1	Section 2.3 New Condition Paragraph 1	It is noted that the indicative staging plan submitted with the application does not clearly indicate the property boundaries and stage boundaries. The stage boundaries should clearly indicate the areas of public domain.	The indicative staging plan has been amended to clearly demonstrate the property boundaries and stage boundaries associated with the application.
2	Section 2.3 New Condition Paragraph 2	Stage 4 should include all the final public domain works for Macquarie Street and Barrack lane. No other roads should be indicated as Stage 4 (contrary to the indicative staging plan shown).	Refer to drawing no. AR-SI-A08-154, named Indicative Staging Plan – Stage 4. This plan has been included in the Staging Report to clearly demonstrate the final public domain works for Stage 4, which relate to the final public domain works to Macquarie Street.
3	Section 2.3 Bullet Point 1.	Proposed Condition A6 enables modification to parts of the staging plan without consultation being carried out with particular parties. Council would expect however to be consulted on any matter related to the impacts on the public domain or local public interest.	SINSW proposes that condition A6 be amended to include an additional sentence stating “ <i>Should the Parramatta Light Rail works not have substantially commenced by January 2026, such Public Domain works will be finalised by the Applicant.</i> ” Thus, providing Council the certainty that they had requested. Consultation with Council for public domain works is a condition of the SSD regardless of this amendment to condition A6.
4	Section 2.4 Amended Condition A6 Bullet Point 1 and 2.	The nominated date should be more specific – i.e. 1 January 2026 rather than just the year 2026. The year nominated is quite far in advance (being 6 years away). It is assumed that light rail would have substantially commenced well before that date. If not, then there is a large time lag before public domain works are constructed. We request that the Department take consideration of this in their assessment.	SINSW has nominated 2026 as a conservative estimate of possible prolonged PLR completion as the construction is not controlled by SINSW. No objection is held to the insertion of January 2026.
5	Section 2.4 Amended Condition A6 Bullet Point 3.	A completion timeframe should be placed on the public domain works to be constructed in the event that the Parramatta Light Rail is not completed by the nominated date. For example, the applicant could be given 13 months from the nominated time period to complete the works.	SINSW has no objection to the proposed 13 month timeframe for works in stage 4.

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6	Section 2.4 Amended Condition A6 Last Paragraph.	The report states pending PLR works, that works outside the school boundary shall be limited to “make good” works. Council does not agree to the proposed “make good” works and has advised the applicant that Macquarie Street and Barrack Street will require asphalt re-sheeting as part of any interim public domain works. This will need to be carried out at the relevant construction stage.	The proposed staging plan has been amended to identify make good works along the Macquarie Street frontage of the site under the various stages of the works.
7	Section 2.5 Staging Report Paragraph 1.	The report states that Stages 1 to 3 will include the making good of public domain from property boundary to existing kerb line. This is not acceptable from a public domain perspective and is contrary to the discussions held between Council officers and the applicant. Each stage requires public domain upgrades to be carried out. This is reflected within the <i>Public Domain Design Approval Staging</i> document that has been provided by the applicant to Council.	SINSW remains committed to achieving a high quality and safe public domain. However, as has been discussed and agreed with Council representatives, in the interest of not investing public funds on soon to be redundant works, public domain impacted upon by future Parramatta Light Rail works will not be subject to an upgrade. Refer to Attachment 1 within the Staging Report for details.
8	Section 2.5 Staging Report Paragraph 2.	It is Council’s understanding from our last meeting with the applicant that an interim Kiss and Drop zone will remain on Little Street. A Kiss and Drop zone shall not be provided on Macquarie Street as stated in the report.	Since the submission of the Modification Application, the final agreed Kiss and Drop zone on Little Street has been approved by Parramatta City Council. Therefore, the proposal to have an interim Kiss and Drop Zone on Macquarie Street is no longer proposed by SINSW.
9	Section 2.5 Staging Report Paragraph 2.	A timing on the completion of works on Little Street should be provided (and can be included within the Staging Report). In this regards, it is anticipated that Little Street would therefore be constructed in 2 phases as part of the Stage 1 works:- <ol style="list-style-type: none"> 1. The provision of a temporary Kiss and Drop zone using the existing kerb and gutter alignment 2. The completion of the Little Street public domain works for the entire Little Street by a suitably nominated timeframe. 	Since the submission of the Modification Application, the final agreed Kiss and Drop zone on Little Street has been approved by Parramatta City Council. Therefore, the proposal to have an interim Kiss and Drop Zone on Macquarie Street is no longer proposed by SINSW.
B. STAGING REPORT			
10	Staging Plan – Bullet Point 1	Attachment 1 – the Staging Plan should clearly indicate the areas of public domain included within each stage.	The indicative staging plan has been amended to clearly demonstrate the property boundaries and stage boundaries associated with the application.
11	Staging Plan – Bullet Point 2	The entirety of Little Street should be included in Stage 1 (with allowances for timing of delivery)	Since the submission of the Modification Application, the final agreed Kiss and Drop zone on Little Street has been approved by Parramatta City Council. The Staging Plan has been updated to highlight Little Street as part of Stage 1.
12	Staging Plan – Bullet Point 3	Stage 4 should include all final public domain works Macquarie Street and Barrack Lane only.	The proposed Stage 4 works have been updated to relate to Macquarie Street only. No public domain works are proposed to Barrack Lane.

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13	Staging Report	The Staging Report should incorporate the Public Domain Approval Staging document as agreed by Council. This outlines the requirements for public domain works for each stage....[and two (2) bullet points]	The Public Domain Approval Staging document referenced by Council is related to detailed scope within each stage and is not associated with the Staging Modification. Amendment to scope is not proposed by the subject modification application. As noted in the staging report the works proposed by SINSW will only be undertaken to the satisfaction of the local authority being Parramatta City Council.													
14	Attachment 4 – B13	<div>The SSD matrix within the Staging Plan incorrectly indicates that public domain works and the like are not applicable during Stages 1 to 4.</div> <table><tr><td>B13</td><td>Design Modifications - Little Street Pick-up/Drop-off Parking The final design and layout of additional car parking spaces to be provided in Little Street is to be undertaken in consultation with Council, the NSW police Force and Transport for NSW and submitted to the satisfaction of the Certifying Authority prior to the commencement of the associated works.</td><td>Not Applicable</td><td>Not Applicable</td><td>Not Applicable</td><td>Applicable</td></tr></table>	B13	Design Modifications - Little Street Pick-up/Drop-off Parking The final design and layout of additional car parking spaces to be provided in Little Street is to be undertaken in consultation with Council, the NSW police Force and Transport for NSW and submitted to the satisfaction of the Certifying Authority prior to the commencement of the associated works.	Not Applicable	Not Applicable	Not Applicable	Applicable	<div>Condition B13 is associated with Little St <u>ONLY</u> and has been allocated to Stage 1. Refer below snapshot and updated Staging Report.</div> <div>Since the submission of the Modification Application, the final agreed Kiss and Drop zone on Little Street has been approved by Parramatta City Council</div> <table><tr><td>B13</td><td>Design Modifications - Little Street Pick-up/Drop-off Parking The final design and layout of additional car parking spaces to be provided in Little Street is to be undertaken in consultation with Council, the NSW police Force and Transport for NSW and submitted to the satisfaction of the Certifying Authority prior to the commencement of the associated works.</td><td>Evidence to be submitted verifying compliance with this condition prior to CC5 or CC6.</td><td>Applicable</td><td>Not Applicable</td><td>Not Applicable</td><td>Not Applicable</td></tr></table>	B13	Design Modifications - Little Street Pick-up/Drop-off Parking The final design and layout of additional car parking spaces to be provided in Little Street is to be undertaken in consultation with Council, the NSW police Force and Transport for NSW and submitted to the satisfaction of the Certifying Authority prior to the commencement of the associated works.	Evidence to be submitted verifying compliance with this condition prior to CC5 or CC6.	Applicable	Not Applicable	Not Applicable	Not Applicable
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15	Attachment 4 – B15	<table><tr><td>B15</td><td>Public Domain Works Prior to the commencement of any footpath or public domain works, the Applicant shall consult with Council and Transport for NSW and demonstrate to the Certifying Authority that the streetscape design and treatment meets the requirements of these authorities, including addressing pedestrian management. The Applicant shall submit documentation of approval for each stage from Council and Transport for NSW to the Certifying Authority.</td><td>Not Applicable</td><td>Not Applicable</td><td>Not Applicable</td><td>Applicable</td></tr></table>	B15	Public Domain Works Prior to the commencement of any footpath or public domain works, the Applicant shall consult with Council and Transport for NSW and demonstrate to the Certifying Authority that the streetscape design and treatment meets the requirements of these authorities, including addressing pedestrian management. The Applicant shall submit documentation of approval for each stage from Council and Transport for NSW to the Certifying Authority.	Not Applicable	Not Applicable	Not Applicable	Applicable	<div>The matrix has been updated with B15 made “Applicable” to all Stages. Refer below snapshot and updated SSD Matrix included in the Staging Report.</div> <table><tr><td>B15</td><td>Public Domain Works Prior to the commencement of any footpath or public domain works, the Applicant shall consult with Council and Transport for NSW and demonstrate to the Certifying Authority that the streetscape design and treatment meets the requirements of these authorities, including addressing pedestrian management. The Applicant shall submit documentation of approval for each stage from Council and Transport for NSW to the Certifying Authority.</td><td>Approval granted by Council and Transport NSW to be submitted in accordance with this condition to PCA prior to the issuance of CC7.</td><td>Applicable</td><td>Applicable</td><td>Applicable</td><td>Applicable</td></tr></table>	B15	Public Domain Works Prior to the commencement of any footpath or public domain works, the Applicant shall consult with Council and Transport for NSW and demonstrate to the Certifying Authority that the streetscape design and treatment meets the requirements of these authorities, including addressing pedestrian management. The Applicant shall submit documentation of approval for each stage from Council and Transport for NSW to the Certifying Authority.	Approval granted by Council and Transport NSW to be submitted in accordance with this condition to PCA prior to the issuance of CC7.	Applicable	Applicable	Applicable	Applicable
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16	Attachment 4 – B16	<table><tr><td>B16</td><td>Prior to the commencement of any footpath or public domain works, the Applicant shall consult with Council to prepare a Public Domain Lighting Plan and demonstrate to the Certifying Authority that the plan addresses Council's requirements.</td><td>Not Applicable</td><td>Not Applicable</td><td>Not Applicable</td><td>Applicable</td></tr></table>	B16	Prior to the commencement of any footpath or public domain works, the Applicant shall consult with Council to prepare a Public Domain Lighting Plan and demonstrate to the Certifying Authority that the plan addresses Council's requirements.	Not Applicable	Not Applicable	Not Applicable	Applicable	No changes to street lighting are proposed as part of the application with the exception of Little Street. As such this condition is to be satisfied as part of Stage 1 with the Little Street works.							
B16	Prior to the commencement of any footpath or public domain works, the Applicant shall consult with Council to prepare a Public Domain Lighting Plan and demonstrate to the Certifying Authority that the plan addresses Council's requirements.	Not Applicable	Not Applicable	Not Applicable	Applicable											

Responses to Department of Premier and Cabinet Letter (as delegate of the NSW Heritage Council), dated 30 August 2019

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18	Last page – formal commitment	<p>To ensure the proposed change, the following additional commitments would be necessary to ensure the interpretation is cohesive and well incorporated into the detailed design. This could avoid a poor interpretive outcome resulting from a retrofitted strategy at the end of the projects. These commitments include:</p> <ol style="list-style-type: none"> 1. A Formal Commitment to delivery of site Interpretation as a cohesive story for the site. Advice on how it will be achieved and incorporated into the completed design across all Quadrants. This needs to be provided to DPIE and the Heritage Council of NSW for information, prior to release of the completion certificate for stage 1. That document should include the following: <ol style="list-style-type: none"> a) commitment to the preparation of an Interpretation Strategy which addresses the detail of final design elements and their response to the final archaeological report and its findings across the site in an integrated way; b) Commitment to retaining a consistent message across the entire site (i.e. all Quadrants) linked to the key phases of Parramatta's development (including both historical and Aboriginal archaeological results). c) identify how interpretation will be achieved in the staged approach given the final reporting will not be available until mid-2021, significantly post-dating the phased opening of the school; d) commitment to relevant outcomes from the final reporting for incorporation into the interpretation outcomes across the site through design retrofitting, if these results are significantly different and relevant to understanding the site's history and development. 	GML Heritage has provided a detailed response to the matters raised by the Department of Premier and Cabinet Letter (as delegate of the NSW Heritage Council). A copy of this letter is attached as an Appendix to this letter.

Responses to Transport for NSW Letter, dated 2 September 2019, reference CD19/06788

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19	Bullet Point 1	The Applicant intends to provide interim "Kiss & Drop" on Macquarie Street as part of the Stage 1 works with the final location being on Little Street, which is intended for completion at Stage 4. In this regard, any relocation of "Kiss & Drop" to Macquarie Street should be subject to coordination with the Parramatta Light Rail team at TfNSW.	Since the submission of the Modification Application, the final agreed Kiss and Drop zone on Little Street has been approved by Parramatta City Council. Therefore, the proposal to have an interim Kiss and Drop Zone on Macquarie Street is no longer proposed by SINSW.
20	Bullet Point 2	<p>The following should be included in Section 4: Mechanisms of Impacts of Staging within the Staging Report as part of the mechanisms to manage the interface between the construction team and school operations:</p> <ul style="list-style-type: none"> ○ Consult with the Parramatta Light Rail construction team as there will be an interface between both construction teams, particularly during Stage 3. 	Consultation with PLR is a condition within the SSD which the project team, along with PLR, are actively satisfying. Interface meetings and correspondence will continue throughout the course of the project at all stages.