

30 October 2019

218316

Jim Betts
Secretary
Department of Planning, Industry and Environment
320 Pitt Street
Sydney NSW 2000

Dear Mr Betts,

Request for Secretary's Environmental Assessment Requirements Westmead Catholic Education Campus

We are writing on behalf of the Catholic Education Diocese of Parramatta, the applicant for the proposed Westmead Catholic Community (WCC) project at 2 Darcy Road, Westmead.

The WCC project seeks to meet the needs of the growing population within the region by providing upgraded school facilities for Mother Teresa and Sacred Heart Primary Schools, as well as a new Parish church. WCC is a collaboration between the Diocese of Parramatta, the Sisters of Mercy Parramatta and the Marist Brothers.

As the proposal is for the purposes of alterations and additions to an existing school and has a capital investment value in excess of \$20 million (see cost estimate at **Attachment A**) it is State Significant Development (SSD) for the purposes of the *Environmental Planning and Assessment Act 1979* (the Act). The Parish church is also SSD under clause 8(2)(a) of *State Environmental Planning Policy (State and Regional Development) 2011* as it forms part of the proposal which comprises a single, integrated development with significant functional links between the education and church uses.

The purpose of this letter is therefore to request the Secretary's Environmental Assessment Requirements (SEARs) for the preparation of an Environmental Impact Statement (EIS) for the proposed development. To support the request for the SEARs this letter provides an overview of the proposed development, sets out the statutory context, and identifies the key likely environmental and planning issues associated with the proposal.

This letter is accompanied by the following:

- Cost Estimate prepared by WT Partnership (**Attachment A**);
- Preliminary Plans prepared by Alleanza Architecture (**Attachment B**); and
- Biodiversity Assessment Waiver Request prepared by Cumberland Ecology (**Attachment C**).

1.0 The Site

The subject site is located at 2 Darcy Road, Westmead, approximately 2km to the north-west of the Parramatta CBD and approximately 300m to the west of Westmead Train Station. The site is located within the Parramatta Local Government Area (LGA).

The site has an area of approximate 12ha and a frontage of approximately 430m to Darcy Road. The site consists of two lots, which are legally described as Lot 1 in DP1095407, which is owned by the Trustees of the Roman Catholic Church of Parramatta, and Lot 1 in DP1211982, which is under the ownership of the Trustees of the Marist Brothers.

The site is bound by Darcy Road (to the north), the T1 North Shore & Western / T5 Cumberland train lines (to the south), the Western Sydney University Westmead Campus (to the east) and residential uses (to the west).

To the north of the site, across Darcy Road is the Westmead Health and Education Precinct comprising the Westmead Hospital, Westmead Private Hospital and the Western Sydney University Medical Research Institutes. The locational context of the site is shown at **Figure 1**.

The Westmead Health and Education Precinct, the WCC site and the surrounding residential land collectively form part of the recently nominated Westmead Priority Precinct Area.

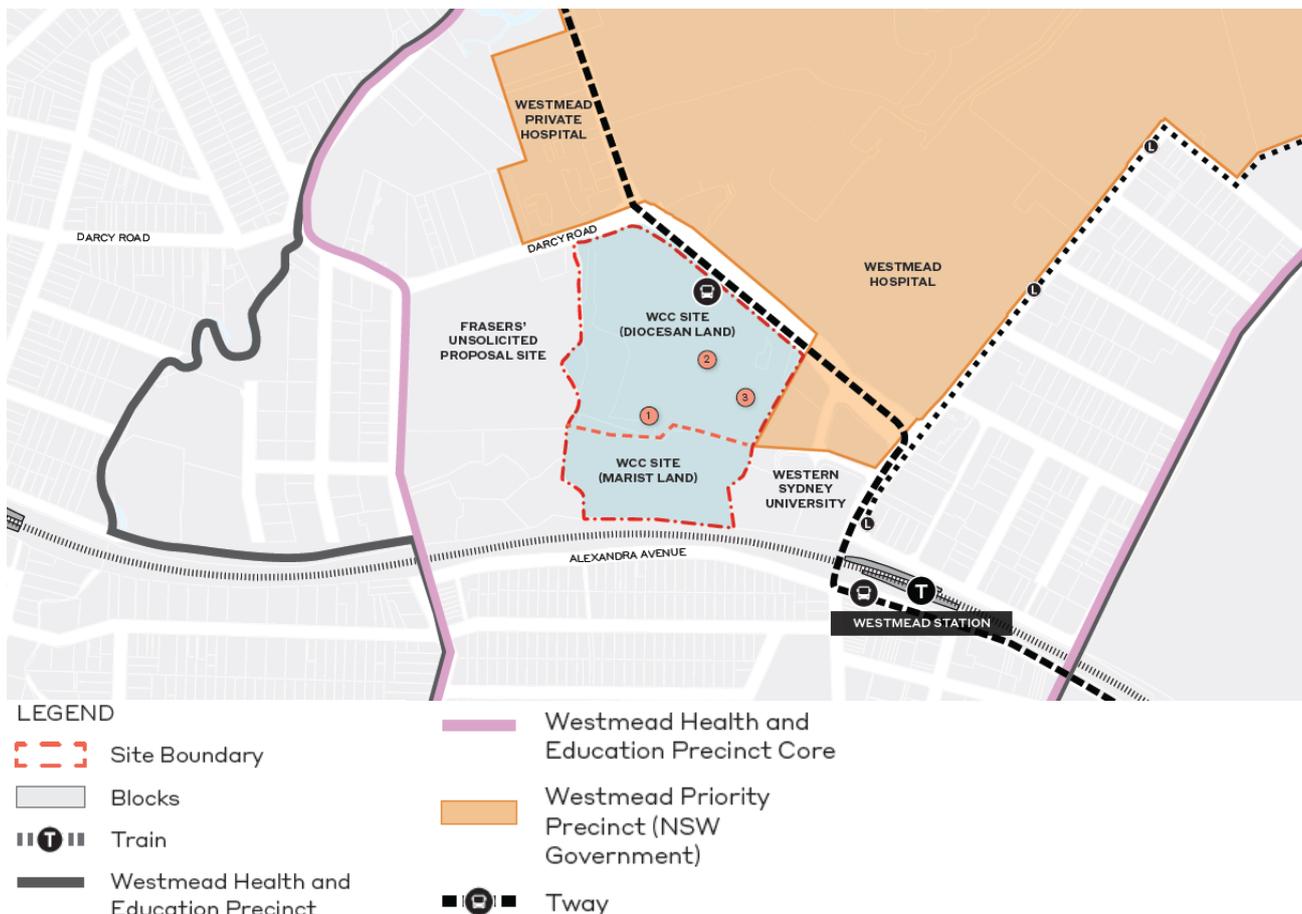


Figure 1 Location Plan

Source: Ethos Urban

1.1 Existing Development

The site currently contains three separate schools being the Catherine McAuley Westmead (girls high school) which predominantly occupies the northern part of the site, and the Parramatta Marist High School (boys school) which occupies the eastern part of the site. The Mother Teresa Primary School occupies part of the Catherine McAuley school building in the centre of the site. The southern portion of the site contains open sports fields associated with the Parramatta Marist High School.

The existing Brother’s residence is located in the north-eastern corner of the site, and an at grade car park occupies the western part of the site, to the north of the sports fields. **Figure 2** shows the location of the existing school buildings, the Brother’s residence, the car park area and the sports fields that make up the site.

Collectively, the three schools currently accommodate approximately 2,637 students and 190 staff. The majority of the existing buildings across all three schools are reaching end of life and historically, the schools have been operated independently with minimal collaboration and resource sharing.

Separately, Sacred Heart Primary School (including a Parish church and Priest residence) is located on Ralph Street, Westmead. The site sits within the Cumberland Council Local Government Area (LGA). The buildings on the Sacred Heart Primary School site at Ralph Street are aging and the playground is on leased land, which is due to expire in February 2021. Sacred Heart currently accommodates approximately 197 students and 13 staff. The Ralph Street site does not form part of the proposal, however the application will seek to relocate the Sacred Heart Primary School onto the WCC site, as described below.



Figure 2 Existing Buildings and Use

Source: Alleanza

2.0 Description of proposed development

The State Significant Development application will seek approval for:

- A primary school with capacity for approximately 1,680 students, to provide expanded facilities for the existing Mother Teresa Primary School on the site and to replace the existing Sacred Heart Primary School at Ralph Street;
- A new Parish church;
- A Catholic early learning centre (fit-out within an existing building);
- A new, multi-storey car park and drop off zone; and
- New landscaping.

It is anticipated that separate approval will be sought for early works, including demolition of the existing Brother's residence and the relocation of demountables.

The proposed works form the first stage of the broader redevelopment of the site and are referred to as Project 1, Stage 1 (refer to **Figure 3**). The development responds to the immediate need to relocate the Sacred Heart Primary School from Ralph Street to the WCC site. It will also bring a new Parish church that will be a gateway building for the site and the local community.

In the future, the WCC will be redeveloped to integrate the schools in a vertical building accessible by a new internal road network. This will involve expanding the services offered to accommodate approximately 6,000 students. This is referred to as Project 1, Stage 2 and is shown indicatively at **Figure 4**. There is also an opportunity for surplus land to be redeveloped to accommodate a range of complementary uses. However, this would be subject to a separate planning process as part of the broader Westmead Planned Precinct and is referred to as Project 2.

Whilst the broader Masterplanning for the site has informed Project 1, Stage 1 and has been part of initial consultation and discussions with the NSW Government Architect, staged approval is not being sought and future stages of the development will be subject to separate planning approvals. This SEARs request relates to Project 1, Stage 1 only.

Preliminary Architectural Plan prepared by Alleanza Architecture are provided at **Attachment B**.



Figure 3 Project 1, Stage 1 development (subject to this SEARs request)

Source: Alleanza

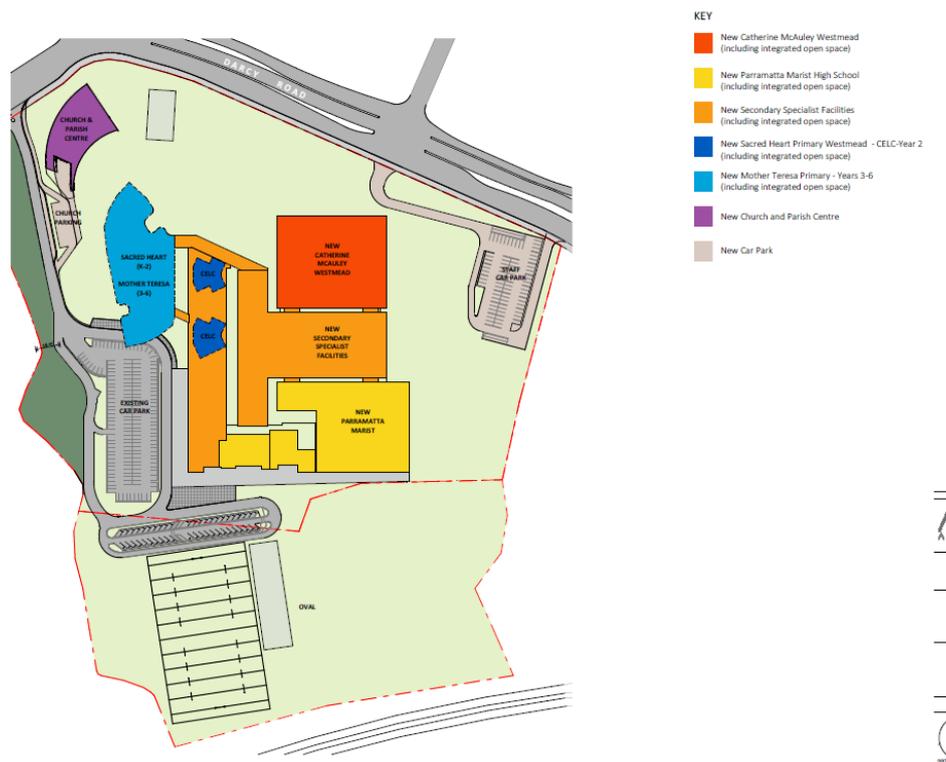


Figure 4 Project 1, Stage 2 development (for information only)

Source: Alleanza

3.0 Strategic planning context

3.1 Greater Sydney Region Plan

Westmead is identified as forming part of ‘Greater Parramatta’ and a part of the key health and education precinct. It is expected to receive a high level of public and private sector investment to enable the centre to grow and evolve. The importance of catering for jobs and housing is recognised throughout the plan. Additionally, the plan recognises the need to cater for growing student numbers through the innovative and efficient use of land and the sharing of community facilities.

3.2 Central City District Plan

The Central City District Plan was released in March 2018. This plan recognises that the Central City will grow substantially, capitalising on its location close to the geographic centre of Sydney. The Plan recognises the importance of planning to support education facilities, particularly in the Central district.

Of particular relevance to this proposal is that the Central City District Plan identifies a forecasted growth in student numbers (an additional 89,360 students) in the Central City District by 2036. The Plan also recognises the need to respond to growth and changing learning models in innovative ways such as more efficient use of land, contemporary design, greater sharing of spaces and facilities, and flexible learning spaces.

- Planning Priority E3: Providing services and social infrastructure to meet people’s changing needs:** As noted in the District Plan, *“the NSW Department of Education estimates that an extra 89,360 students will need to be accommodated in government and non-government schools in the District by 2036”*. The proposed development will assist in meeting this demand by providing additional school places to cater for growing demand within the catchment. The proposed development will also assist in meeting social infrastructure requirements by potentially providing shared facilities that can be used by the local community outside of school hours.

- **Planning Priority E4: Fostering healthy, creative, culturally rich and socially connected communities:** The proposed development will assist in community-building efforts by expanding a key social connector that will provide opportunities for people to connect with each other. Further, as noted above, the redevelopment will provide a new Parish church and there is potential to provide shared facilities that will allow the community to congregate and connect.
- **Planning Priority E5: Providing housing supply, choice and affordability, with access to jobs, services and public transport:** Although the proposed development does not provide additional housing, it does provide essential services i.e. schools, which will assist in allowing more families in the catchment to access a school within 30 minutes of their home.

3.3 Westmead Planned Precinct

In June 2017, Westmead was announced by the then Department of Planning and Environment (DPE) as a Planned Precinct. The precinct has two distinct areas – the health and education area north of the rail line (the Westmead Alliance Area), and the residential area south of the rail line. The Planned Precinct is currently in the ‘project establishment phase’, with working arrangements being set up with the City of Parramatta and Cumberland Council, relevant State Government agencies and members of the Westmead Alliance. DPE is expected to commission specialist studies and undertake consultation in order to develop a draft Precinct Plan. The plan will be publicly exhibited prior to its finalisation and will result in a new zoning regime.

3.4 Environmental Planning and Assessment Act 1979

The Act establishes the assessment framework for SSD. Under Section 4.38 of the Act the Minister for Planning and Public Spaces is the consent authority for SSD. Section 4.12(8) requires that a development application for SSD is to be accompanied by an Environmental Impact Statement (EIS) in the form prescribed by the Regulations. This request for SEARs will inform the requirements of the EIS.

3.5 State Environmental Planning Policy (State and Regional Development) 2011

The *State Environmental Planning Policy (State and Regional Development) 2011* (SEPP SRD) identifies development which is declared to be State Significance. Clause 15 of Schedule 1 of the Policy provides that the proposed development is SSD, as follows (our emphasis):

15 Educational establishments

(1) Development for the purpose of a new school (regardless of the capital investment value).

(2) Development that has a capital investment value of more than \$20 million for the purpose of alterations or additions to an existing school.

(3) Development for the purpose of a tertiary institution (within the meaning of State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017), including associated research facilities, that has a capital investment value of more than \$30 million.

As the proposal is for the purposes of alterations and additions to an existing school and has an estimated Capital Investment Value of \$20 million, the development can be declared to be SSD (see cost estimate prepared by WT Partnership at **Attachment A**).

A place of public worship would not qualify as SSD in its own right. However, under clause 8(2)(a) of SEPP SRD, where a proposal comprises development that is only partly SSD, the remainder of the development is also declared to be SSD where the SSD and remaining components are sufficiently related. The proposal comprises a single, integrated development with significant functional links between the education and church uses.

3.6 State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017

Under Schedule 4 of *State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017* (Education SEPP), proposals for schools need to address Schools-design quality principles. There are seven principles that provide a guide for the development of schools to ensure that facilities are well-designed, appropriately located, and fit for purpose. The principles aim to ensure that the design of school infrastructure

responds appropriately to the character of the area, landscape setting and surrounding built form to ensure that schools and school buildings are an integral part of the community.

Parts 3 and 4 provide provisions relevant to the development of early education and schools which will need to be considered as part of the future SSD application.

3.7 Parramatta Local Environmental Plan 2011

The site is subject to the provisions of the *Parramatta Local Environment Plan 2012* (PLEP 2012). The key provisions of the LEP are discussed below in **Table 1**.

Table 1 Summary of relevant provisions in PLEP 2011

Item	Control	Comment
Zone	SP2 (Educational Establishment)	Educational uses and any use ordinarily incidental or ancillary are permissible. The Parish church will operate as a subordinate and ancillary use to the school and on this basis is considered to be permissible on the site. The permissibility of the church is considered further at Section 3.7.1 below.
Height of buildings	No building height control applies to the site	-
Floor space ratio	No FSR control applies to the site	-
Heritage	The site is neither heritage listed nor listed as a heritage conservation area under the LEP.	The site adjoins the University of Western Sydney campus (to the east) which is listed as a heritage item.
Riparian land	The western boundary of the site is identified as riparian land under the PLEP 2011	The western alignment is identified as a 'riparian land and waterways' under the PLEP 2011. Before determining a DA on such land, the consent authority will need to consider any impacts of the proposal on the riparian land and its surrounds.

3.7.1 Permissibility

The site is zoned SP2 Educational Establishment. Educational uses are permissible with development consent along with any use that is ordinality incidental or ancillary to the education use.

The Parish church is proposed to be used regularly by students of the school as part of their curriculum, as well as by the broader school community as part of the day – to – day operation of the Catholic schools. In terms of scale and impact of the development, the church forms the 'lesser' component of the proposal.

While the Parish is anticipated to be opened up for members of the public during the weekends, the primary purpose of the Parish remains to service the school and the students in attendance. On this basis, it is considered that the Parish is a subordinate use that is incidental to the primary education use and therefore permissible on the site.

3.8 Other planning policies

In addition to the above, the following policies apply to the site and will need to be considered as part of the SDD application:

- *State Environmental Planning Policy No. 55 – Remediation of Land (SEPP 55)*.
- *State Environmental Planning Policy (Infrastructure) 2007*.
- *State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017*
- *State Environmental Planning Policy No. 64 – Advertising and Signage*

- *Draft State Environmental Planning Policy (Remediation of Land)*
- *Draft State Environmental Planning Policy (Environment) and*

4.0 Overview of likely environmental and planning issues

Based on our preliminary environmental assessment, the following are the key environmental assessment issues that will need to be considered as part of the future DA.

4.1 Flooding and Riparian Land

The master planning for the site seeks to avoid areas of flood prone land in the south of the site, by continuing to concentrate built form to the north of the site, away from flood prone areas. A Flood Impact Assessment will be submitted with the EIS.

The landscape design for the site will look at opportunities to incorporate the riparian corridor on the site's western boundary for improved learning and environmental outcomes.

4.2 Heritage and Archaeology

Whilst is not a heritage item and is not known to have any Aboriginal cultural heritage significance, an Aboriginal Cultural Heritage Assessment Report will be prepared to accompany the application.

4.3 Traffic

Vehicular access to the site primarily consists of a single internal road, off Darcy Road, along the western boundary of the site to the at grade car park (the entry is marked by a double headed blue arrow in **Figure 5**).

A second internal access road is provided off Darcy Road (marked by a double headed blue arrow in **Figure 5**) which services a much smaller at grade car park.

TTPP has been engaged to investigate the impacts of additional traffic generated by an expanded school. In particular, access improvements to facilitate pick-up and drop-off periods are being investigated.

In early 2019, TTPP carried-out a traffic and parking impact assessment for Project 1, Stage 1 of the WCC redevelopment. The study involved undertaking an online Survey Monkey questionnaire, and traffic and pedestrian surveys during the school term. The purpose of the questionnaire was to gather mode share data on how staff and students currently commute to/from the campus, which would be used to forecast future travel patterns of people travelling to the campus during Project 1, Stage 1. Traffic and pedestrian surveys were undertaken to prepare a base-case model of the existing road network and assess the likely future impact to be generated by Project 1, Stage 1. Using SIDRA Network traffic modelling software, an assessment was undertaken of the surrounding road network.

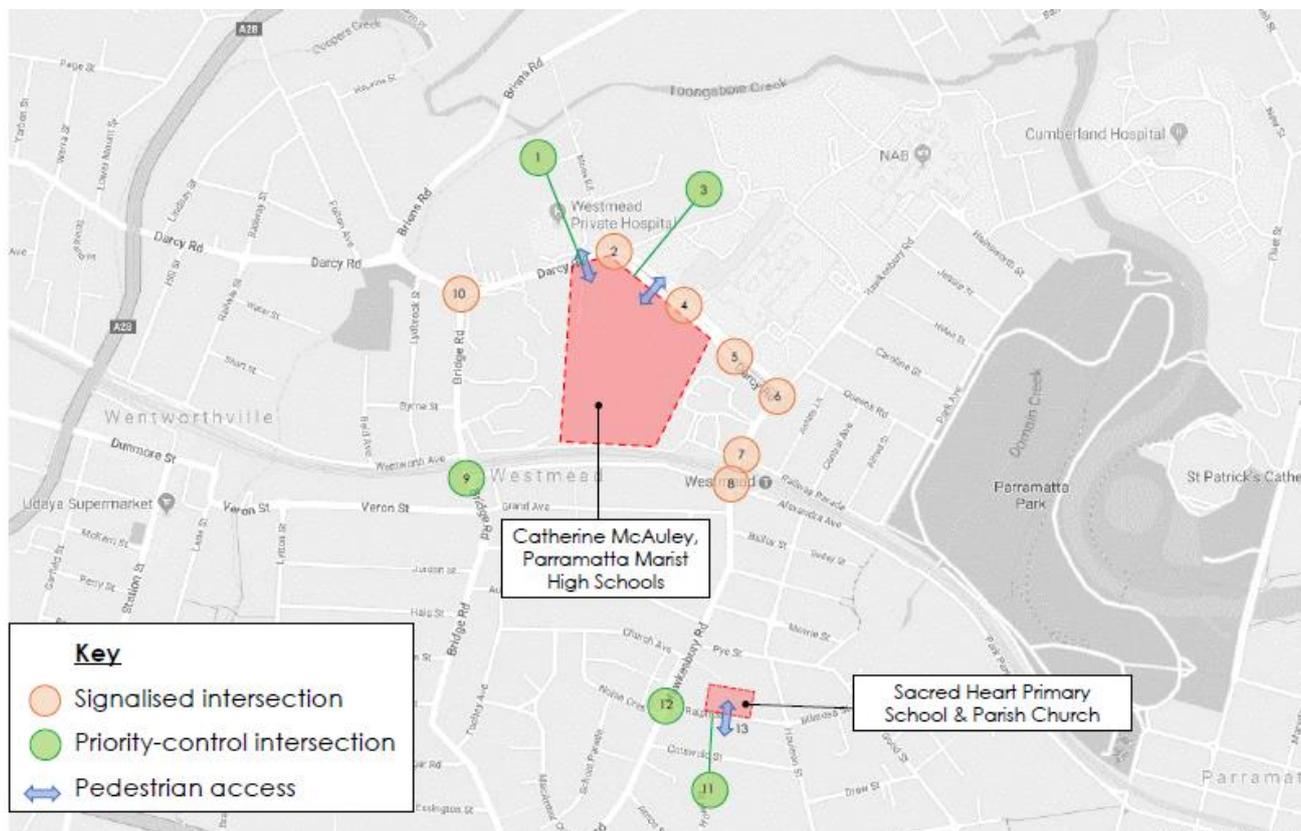


Figure 5 SIDRA modelling points

Source: TTPP

Mode share data was also used to determine current parking demand generated by the existing campus, and validate these with rates stipulated by RMS guidelines and Parramatta City Council’s planning controls. Traffic, transport and parking analysis has guided the campus access configuration to enable a feasible solution for Project 1, Stage 1 of the redevelopment.

As part of the SSD submission, more detailed micro-simulation modelling will be undertaken to assess performance of the surrounding road network and transport network in the future. Modelling will be carried out using VISSIM micro-simulation software and would have consideration for the future Parramatta Light Rail and would be obtained through Parramatta City Council and Transport for NSW.

4.4 Operation of School

An Operations Report will be submitted with the EIS, and will detail existing and proposed school operations, including hours of operation, staff and student numbers, any before or after care school services, and any proposed community use of school facilities, amongst other things.

4.5 Ecologically Sustainable Development

An ESD Report will be submitted with the EIS, and will outline how ESD principles will be incorporated into the design and ongoing operation of the development.

4.6 Social Impacts

A Social Impact Assessment will be submitted with the EIS, and will assess the development's impact on the local community and any existing local social infrastructure. The SIA will also assess the social consequences of the proposed development, and the impact of any decanting activities.

4.7 Noise and Vibration

Noise and vibration are expected to occur throughout construction, to varying degrees. Operational noise will also be present once the school opens (i.e. bells, PA announcements, etc.). These issues will be addressed in a Noise and Vibration Assessment, to be submitted with the EIS.

4.8 Acoustic Amenity

Given the school's location adjacent to a major arterial road, acoustic amenity is expected to be an assessment issue. An Acoustic Report (which will potentially be combined with the Noise and Vibration Assessment) will be submitted and will assess the internal acoustic amenity of classrooms during school hours, and will suggest mitigation measures (if required).

4.9 Contamination

A Phase 1 Site Assessment will be prepared and submitted with the EIS. The assessment will undertake a desktop study of the site and the expected potential for contamination, given past uses. The assessment will also suggest whether a Phase 2 Site Assessment and Remediation Action Plan should be prepared subsequently.

4.10 Geotechnical Conditions

A Geotechnical Assessment will be prepared and submitted with the EIS. The assessment will identify existing ground conditions and the implications for construction of the proposed development.

4.11 Utilities and Infrastructure

An Infrastructure Management Plan will be prepared in consultation with the relevant agencies, identifying the existing capacity of the infrastructure currently servicing the site, and any augmentation, service relocations or easements that may be required to service the proposed development.

4.12 Drainage and Stormwater

An assessment of stormwater and drainage will be prepared and submitted with the EIS. The assessment will detail measures to minimise any impacts on water quality, and will detail proposed drainage with respect to downstream properties.

4.13 Biodiversity

A BDAR Waiver has been prepared to accompany this SEARs request (**Attachment C**). It is considered that preparation of a BDAR is unnecessary in this instance, given the limited vegetation and biodiversity values present on the site. However, a Biodiversity Report will be prepared as part of the EIS, and will address the flora and fauna impacts of the proposed development.

4.14 Waste Management

A Waste Management Plan will be submitted with the EIS, and will assess the likely waste streams to be generated during both construction and operation, and will identify measures to manage this waste.

4.15 Construction Management

Construction management is expected to be complex, given the site's location and the constrained access. A Construction Management Plan will be prepared and submitted with the EIS. The Plan will identify the proposed construction hours and any management measures required to mitigate impacts during construction.

4.16 Accessibility

An Access Report will be prepared and submitted with the EIS. The report will identify any accessibility requirements to comply with the relevant legislation and guidelines.

4.17 Crime Prevention Through Environmental Design

A CPTED Report will be prepared and submitted with the EIS. The report will undertake a CPTED assessment of the site and will recommend suitable design changes.

5.0 Consultation

The Catholic Education Diocese of Parramatta has already carried out consultation with key project stakeholders and will continue to engage with these groups and other authorities, as well as the community and Aboriginal groups, during preparation of the SSD application.

The following stakeholder engagements have been carried out to date:

- Community
 - Formal internal and external communications commenced on 20 September 2019, including a media release and information session.
- City of Parramatta Council
 - Multiple meetings held to date, with early informal discussions held in mid-October 2018 to presentation of the proposed Stage 1 Project 1 development on 18 September 2019.
- Government Architect NSW
 - Preliminary meeting held with GA NSW officers on 3 September 2019. The first meeting with the SDRP is scheduled for early November 2019.
- Westmead Alliance
 - Multiple meetings held with the Westmead Alliance and involvement in master planning design integration.
- Metro / Rail
 - Multiple meetings with Sydney Metro and RMS regarding transport infrastructure provisions.

6.0 Conclusion

The purpose of this letter is to request the SEARs for the preparation of an EIS for the redevelopment of the WCC. Project 1, Stage 1 is critical to ensuring the long-term primary school capacity within the catchment, and will result in significantly improved teaching and learning facilities and efficiencies in the open space and school facilities available to students.

We trust that the information detailed in this letter is sufficient to enable the Secretary to issue SEARs for preparation of an EIS. Should you have any queries about this matter, please do not hesitate to contact the undersigned.

Yours sincerely,



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