

11 January 2023

Michael Cassel
Secretary
Department of Planning and Environment
Locked Bag 5022
Parramatta NSW 2124

Attention: James Groundwater

**RE: SUBMISSION TO PARRAMATTA METRO OVER STATION DEVELOPMENT
(SSD-35538829)**

School Infrastructure New South Wales (SINSW), on behalf of the Department of Education (DoE), welcomes the opportunity to provide comments on Concept State Significant Development Application (Concept SSDA) SSD-35538829 for the Parramatta Metro Over Station Development within the block bound by George Street, Church Street, Smith Street and Macquarie Street (the site).

SINSW understands that SSD-35538829 seeks development consent for land uses and maximum building envelopes for four buildings comprising:

- Building A
 - Commercial and retail land uses
 - Approximately 38 storeys (RL 172.m)
 - Maximum GFA of 78,700m²
- Building B
 - Residential and retail land uses
 - Approximately 33 storeys (RL 130m)
 - Maximum GFA of 20,000m²
- Building C
 - Commercial and retail land uses
 - Approximately 26 storeys (RL 135.5m)
 - Maximum GFA of 35,950m²
- Building D
 - Commercial and retail land uses
 - Approximately 24 storeys (127.4m)
 - Maximum GFA of 55,359m²
- Maximum of 455 car parking spaces across 3 basement levels

The site is nearby to Parramatta Public School and Arthur Phillip High School which are located to the east and southeast of the site.

SINSW has reviewed the DA documentation and requests that the Department of Planning and Environment (DPE) give consideration to the following matters in its assessment:

Site Context

Figure 2-4 within the EIS annotates surrounding development that is considered a major attractor and includes Arthur Phillip High School and Parramatta Public School. However, the boundaries of the school shown on Figure 2-4 do not accurately reflect the current school boundaries as shown below.

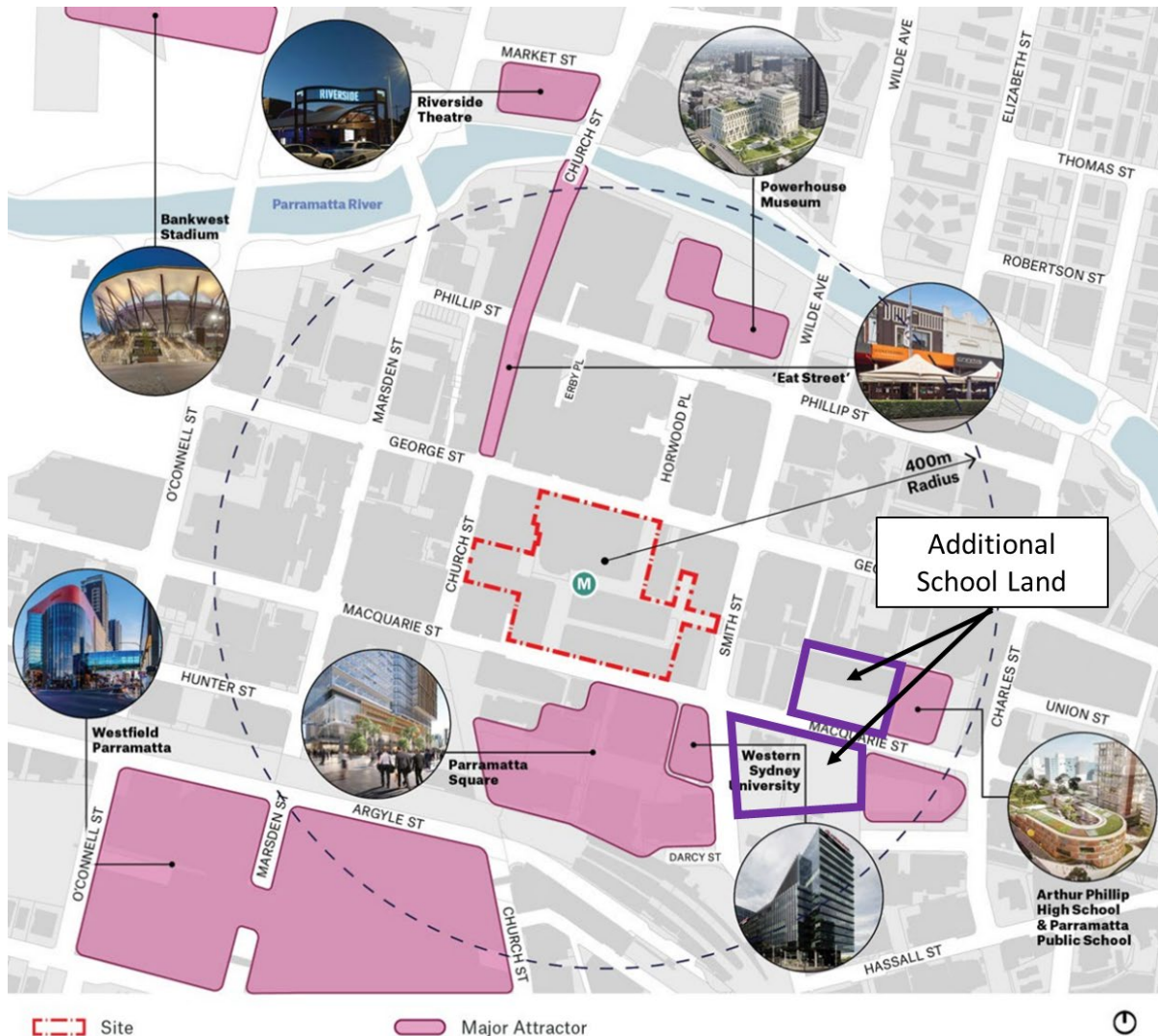


Figure 1: Figure 2-4 of the EIS annotated to show full extent of School boundaries

It is important the site’s context is accurately considered during the assessment of this application including the schools’ current boundaries. This is particularly relevant for the assessment of overshadowing and amenity as addressed below.

Overshadowing

As outlined in the Educational Facilities Standards & Guidelines (EFSG), SINSW aims to ensure that at least 70% of school spaces, including outdoor school play spaces, receive direct sunlight between 9am and 3pm in mid-winter.

The submitted view from the sun diagrams and shadow diagrams show that the proposal will likely result in some overshadowing of Arthur Phillip High School and Parramatta Public School during the afternoon. However, it is noted it is hard to distinguish between new and existing shadows from the diagrams provided.

Nonetheless, the area of the school likely to be affected includes a key area of open space fronting Smith Street. Despite this, the Solar Access and Overshadowing Report does not address impacts to the schools.

Further, it is anticipated additional overshadowing of the school sites will be proposed as a result of increased density controls recently gazetted under the Parramatta CBD Planning Proposal.

SINSW requests that DPE and the Applicant take into consideration anticipated cumulative overshadowing impacts to the schools and seek to minimise impacts where appropriate.

Visual Impact Assessment

The Application is supported by a Visual Impact Assessment (VIA) which includes an assessment of a viewpoint at the south-east corner of Macquarie Street and Smith Street (Viewpoint 3). This viewpoint is taken from the corner of the Arthur Phillip High School grounds where a local heritage item and areas of open space are located.

The assessment of this viewpoint does not identify that there is an educational receiver at this location. SINSW requests that DPE's assessment of visual impacts considers that there is an educational receiver at Viewpoint 3.

Future Detailed SSDA/s

Following any determination of the subject SSDA, it is understood further SSDA/s will be lodged for the detailed building design of the four buildings proposed under this Concept SSDA. SINSW requests future applications consider the following impacts and appropriate mitigation measures in relation to the nearby schools:

- Overshadowing
- Privacy
- Traffic during construction and operation

School Infrastructure NSW (SINSW)

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- Active transport and student safety noting students will likely be walking to the Parramatta Metro station and along the surrounding street network
- Noise and vibration during construction and operation

Should you require further information about this submission, please contact the SINSW Statutory Planning team at StatutoryPlanning@det.nsw.edu.au.

Yours Sincerely,



Lincoln Lawler
Director, Statutory Planning and Sustainability

