

ASSESSMENT REPORT

Arthur Philip High School and Parramatta Public School Redevelopment, Parramatta (SSD 7237 MOD 3)

1. INTRODUCTION

This report is an assessment of an application seeking to modify the State Significant Development (SSD) approval (SSD 7237) for the redevelopment of Arthur Philip High School (APHS) and Parramatta Public School (PPS) in the Parramatta local government area (LGA).

The application has been lodged by Mecone, on behalf of the NSW Department of Education (the Applicant) pursuant to Section 96 (1A) of the *Environmental Planning and Assessment Act 1979* (EP&A Act). The application proposes minor modifications by increasing the roof heights of both the school buildings, revising the external materials for the sports/movement complex, adding turnstiles at the ground floor, extending the roof canopy and adding a bird proof net on top of the APHS building, amending the design of the service road and Barack Lane frontage to retain significant archaeological elements and public domain works for both school sites.

2. SUBJECT SITE

The site is located within the Parramatta local government area (LGA) and is positioned on the eastern edge of Parramatta's City Centre, approximately 100 metres north-east of the Parramatta Transport Interchange. The site context and site location are shown in **Figure 1** below.

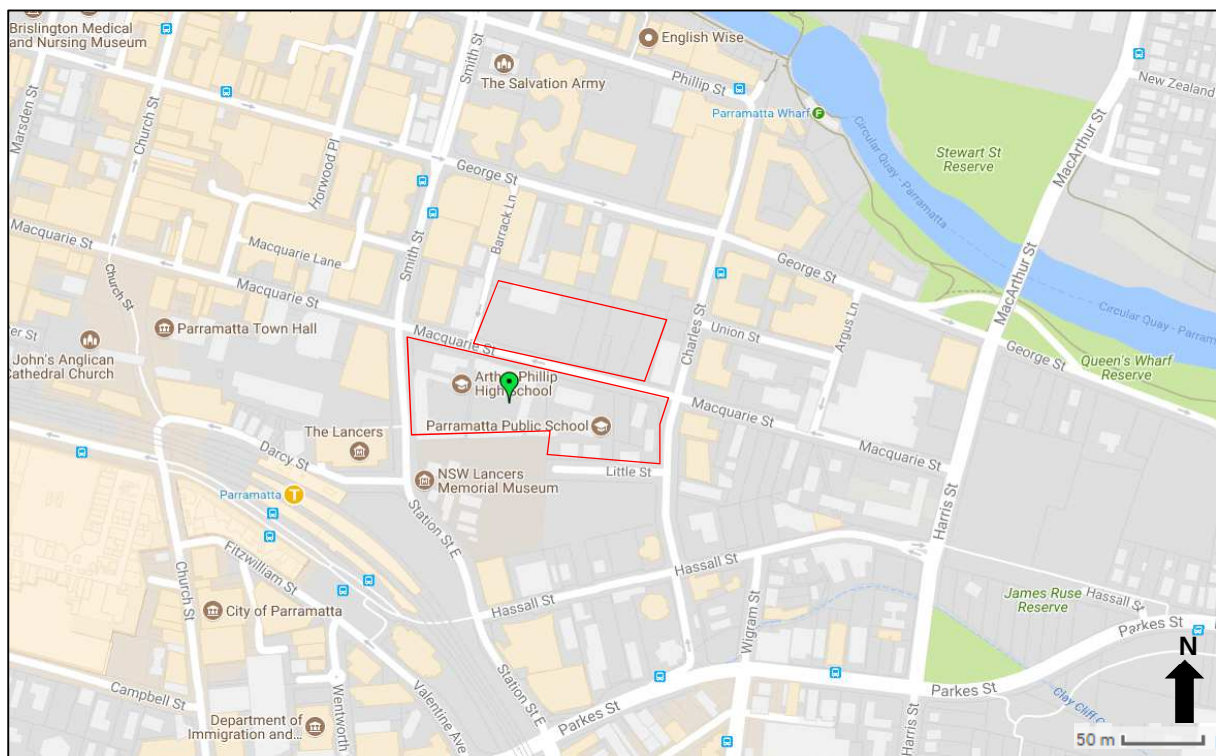


Figure 1: Site Location (Base source: Nearmap)

The APHS site is located on the northern side of Macquarie Street (80 – 100 Macquarie Street) and has an area of approximately 1.2 hectares (ha). The PPS site is located on the southern side of Macquarie Street (175 Macquarie Street) and has an area of approximately 1.78 ha.

Construction works have commenced within the APHS site pursuant to SSD 7237. The PPS site is occupied by both APHS and PPS and contains a number of school buildings, including the heritage significant buildings, hard court recreation areas and on-site car parking. The existing school layout is illustrated in **Figure 2** below.

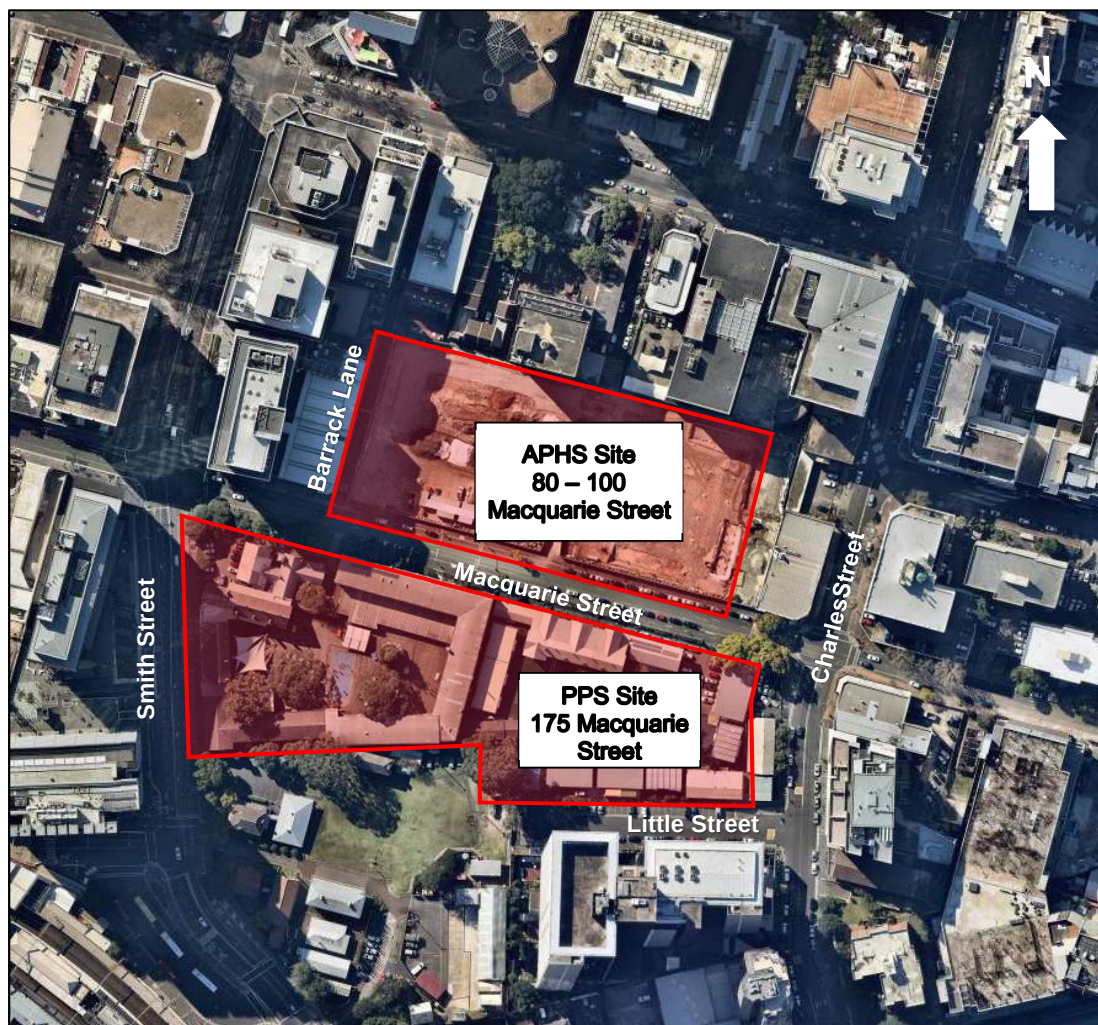


Figure 2: Aerial view of the site and surroundings (Base source: Nearmap)

The locality is characterised by a mix of land uses, including commercial development and a range of mixed used and residential developments, varying in height from two storeys to 20 storeys. Parramatta's central business district is located approximately 250 metres west of the development site.

In addition to the buildings listed as heritage items, the APHS site also contains the heritage significant Convict Barracks Wall. Both sites are also surrounded by a number of other heritage items, including the Commonwealth listed Lancer Barracks Precinct, the locally listed 1st and 15th Royal NSW Lancer Museum collection, State and locally listed Wanders Cottages and State and locally listed Perth House and Stables and Moreton Bay fig tree.

3. APPROVAL HISTORY

3.1 Relevant site approval history

On 15 December 2016, the Executive Director, Priority Projects Assessments approved a SSD application (SSD 7237) for the redevelopment of APHS and PPS campuses, comprising the

following:

- remediation, demolition of existing buildings and structures
- retention and revitalisation of existing heritage items
- construction of a new 17 storey 'vertical' school and two storey sports complex for the Arthur Phillip High School
- construction of a new four storey U-shaped building for Parramatta Public School.

On 27 March 2017, Modification 1 was approved under delegation permitting amendments to conditions B9 and B10 to facilitate a staged approach to remediation works to enable the archaeology investigation requirements of condition B5 to be satisfied.

4. PROPOSED MODIFICATION

On 12 September 2017, the Applicant lodged an application (SSD 7237 MOD 3) seeking approval for the following modifications to the approved development:

- increase in the roof heights of both the buildings
- amendments to the external materials and finishes of the sports complex
- alterations to the external appearance of the APHS building by adding turnstiles, bird proofing and canopies
- addition of stairs and redesigning landscaping along the Barrack Lane frontage
- amendments to the grades of the service road along the northern boundary to retain significant archaeological elements and comply with disabled access requirements.

The proposal is summarised in **Table 1** below:

Table 1: Summary of Proposed Modifications

Arthur Phillip High School site	
<i>Built Form</i>	• increase the roof height from RL 76.48 to RL 76.99 (+510mm) and the flue height from RL 79.68 to RL 80.00 (+320mm) • reduce the height of the perimeter wall to the south of the APHS building • add stairs to the front of the gym café along Barrack Lane • minor extension to the northern façade of the sports building • provide turnstiles to the east elevation and increase the extent of roof canopy.
<i>Building Façade changes</i>	• revise the external materials and finishes of the sports/movement complex building to include: - concrete on the western façade of the lower ground floor instead of brick - terracotta glass fibre reinforced concrete (GFRC) on the upper ground and Level 1 facades instead of brick - metal cladding on the north core of the gym instead of concrete • increase glazing to the café façade along Barrack Lane • provide bird proof net to the roof top.
<i>Works to retain archaeological elements</i>	• revise the design to satisfy conditions B4 to B8 as follows: - alter the grade for the new access road along the northern boundary to reduce impacts and partially retain state significant convict saw pits in situ - add stairs and raise levels of the pedestrian pathway along the Barrack Lane frontage; - alter the design of the planter boxes to a minor extent to avoid impact to state significant Convict Barrack eastern wing remains.
Parramatta Public School site	
<i>Built Form</i>	• increase the roof height from RL 23.58 to RL 23.80 (+220mm) • relocate the amenity block (toilets) to be adjacent to tree B.
General	
<i>Site Landscaping and Public Domain</i>	• revise the design of the landscaped areas on the southern side of the sports complex within the APHS site

	• revise substation layout fronting Charles Street • modify the public domain to Little Street and Charles Street by adding new planter boxes and reconfigured steps to accommodate levels • add bike parking spaces and bike canopy along the Macquarie street frontage of the PPS site • add cricket nets along the Smith Street frontage of the PPS site • revise the design of the amphitheatre within the PPS site by minor adjustments.
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The proposed modifications would require amendment to Condition A2 which includes the approved list of drawings. A comparison of the approved and proposed modifications to the site plans, ground floor plans and the elevations of both the building complexes are provided in **Figures 3 - 14**.

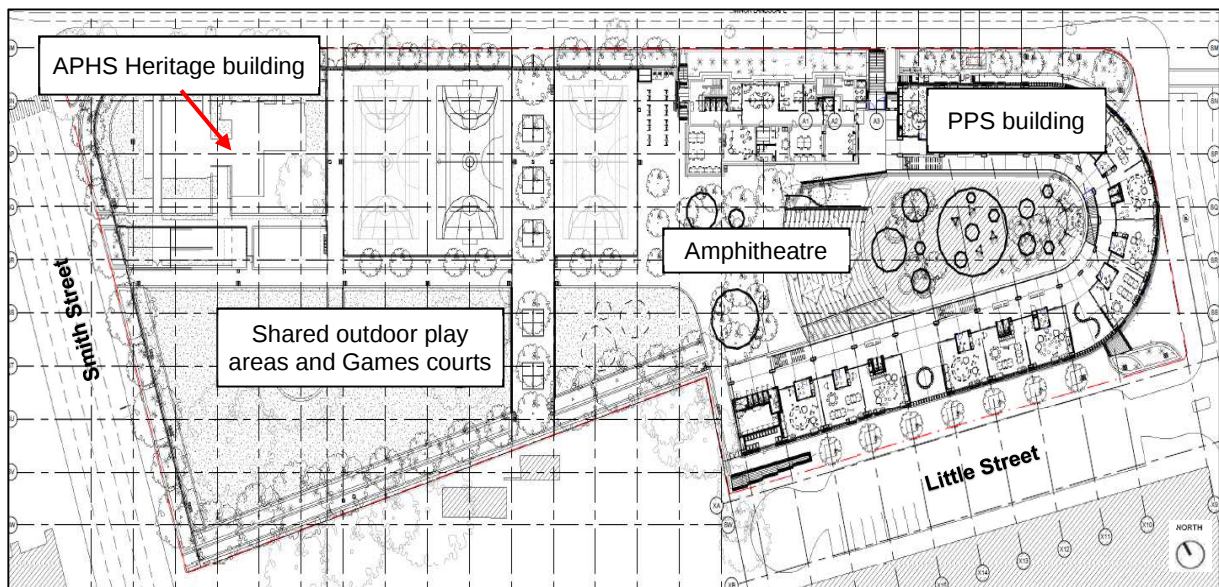


Figure 3 – Approved PPS Ground Floor Plan (Source: DPE)

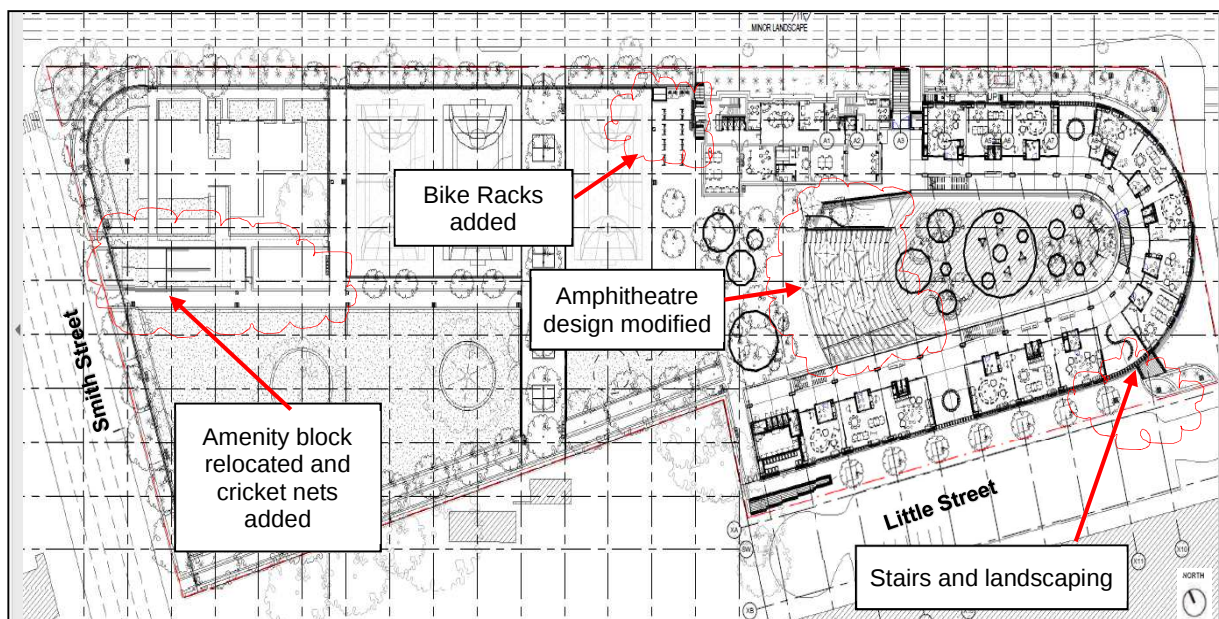


Figure 4 – Proposed PPS Ground Floor Plan (Source: Applicant's Modification 3 EIS)

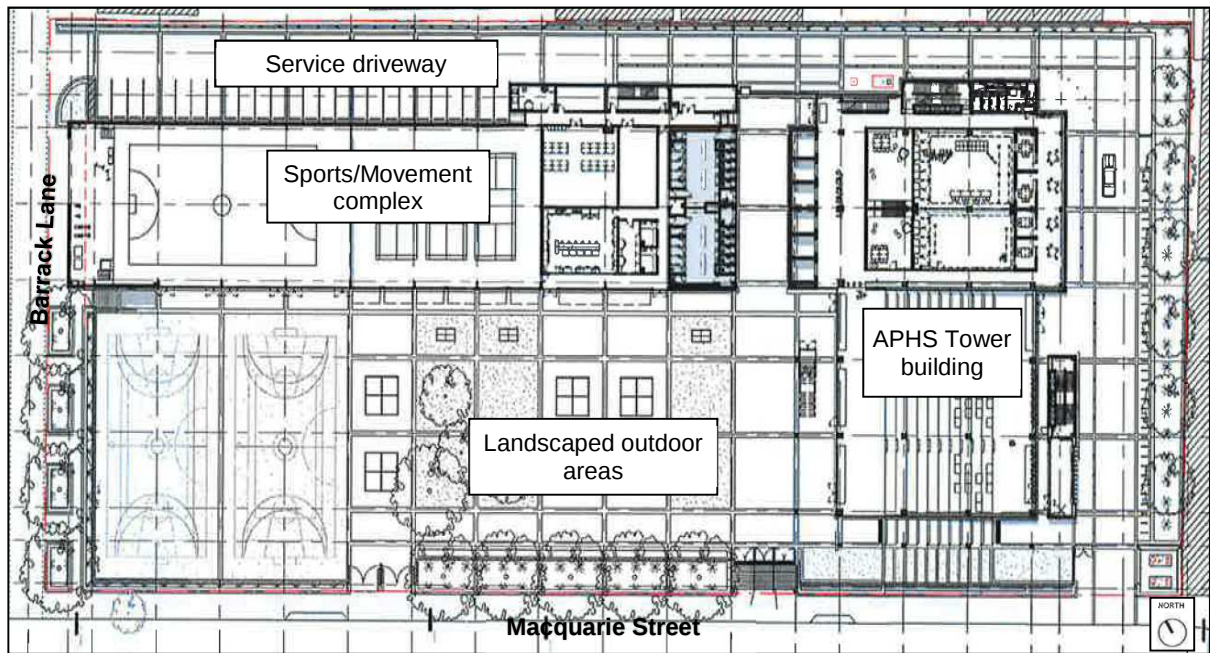


Figure 5 – Approved APHS Ground Floor Plan (Source: DPE)

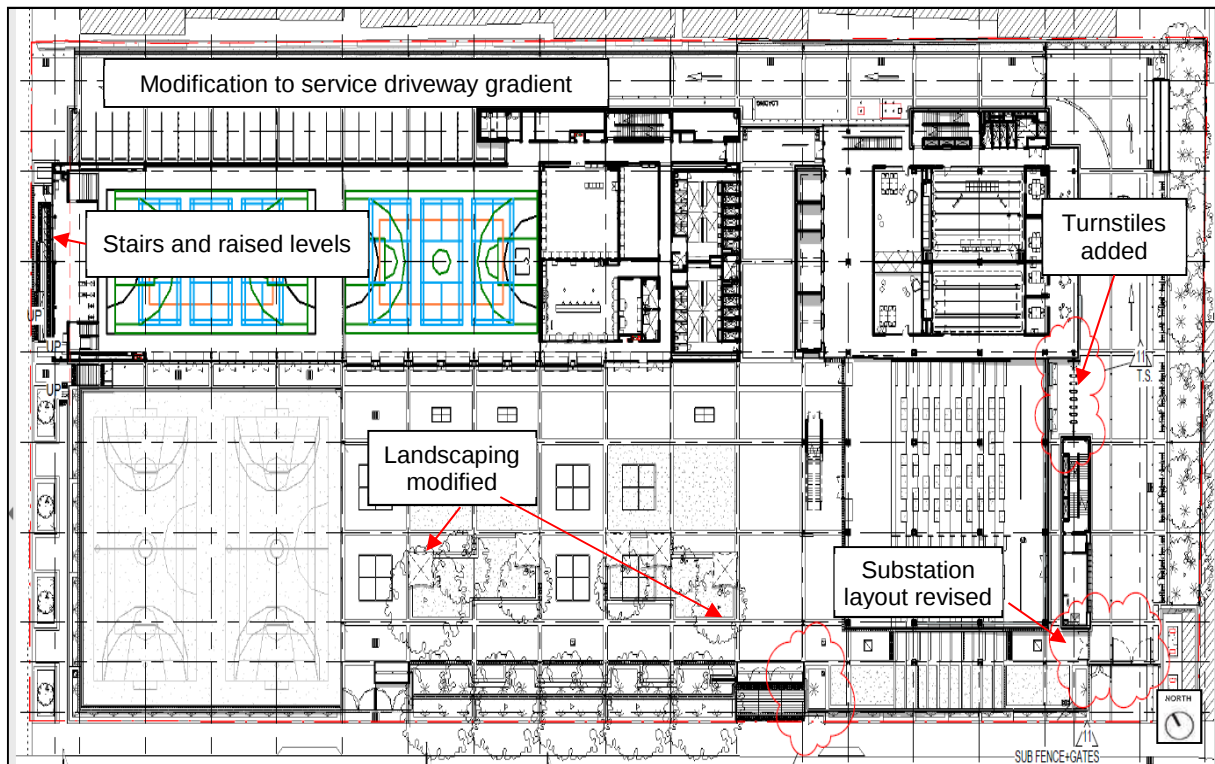


Figure 6 – Proposed APHS Ground Floor Plan (Source: Applicant's Modification 3 EIS)



Figure 7 – Approved south elevation APHS site (Source: DPE)

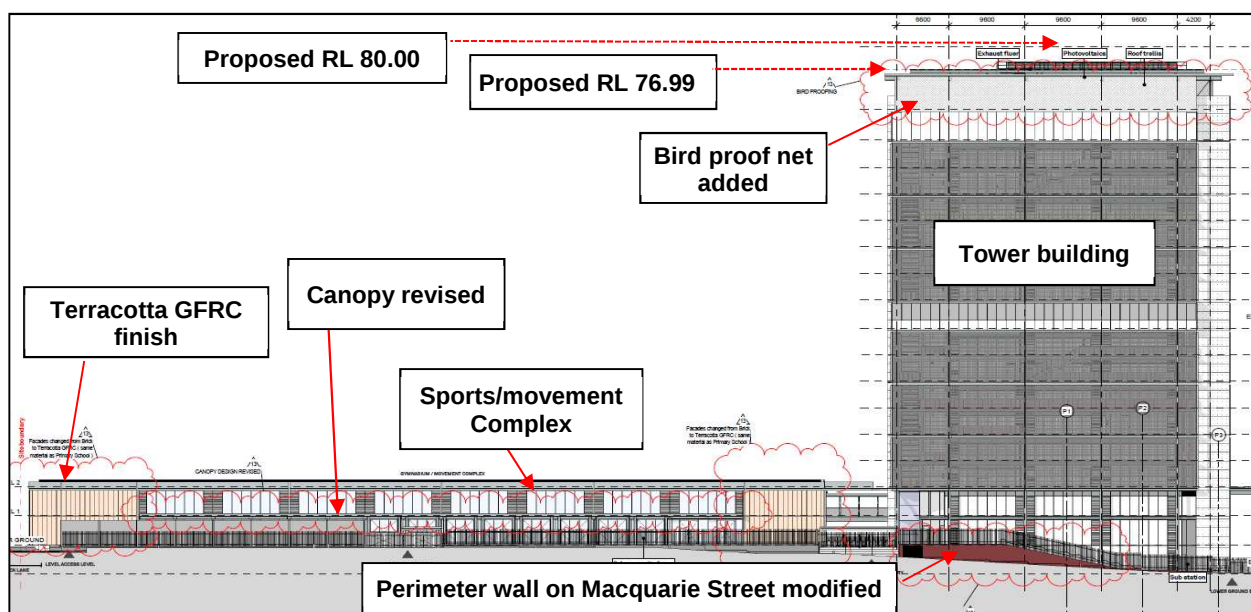


Figure 8 – Proposed south elevation APHS site (Source: Applicant's Mod 3 EIS)



Figure 9 – Approved Barrack Lane elevation for the sports/movement complex (Source: DPE)

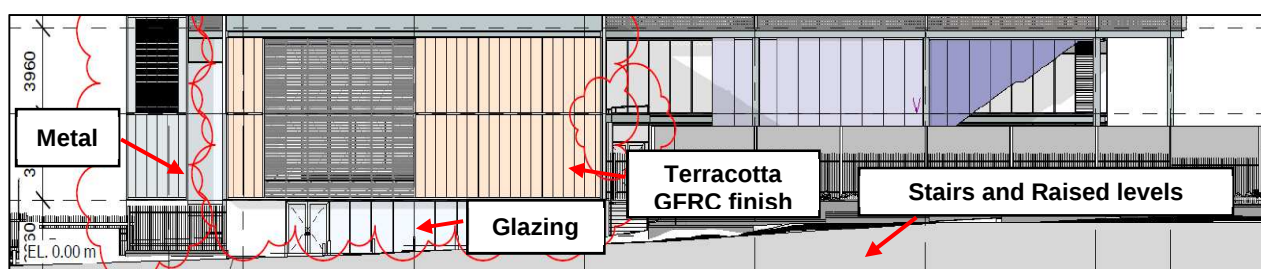


Figure 10 – Proposed Barrack Lane elevation for the sports/movement complex (Source: Applicant's Modification 3 EIS)

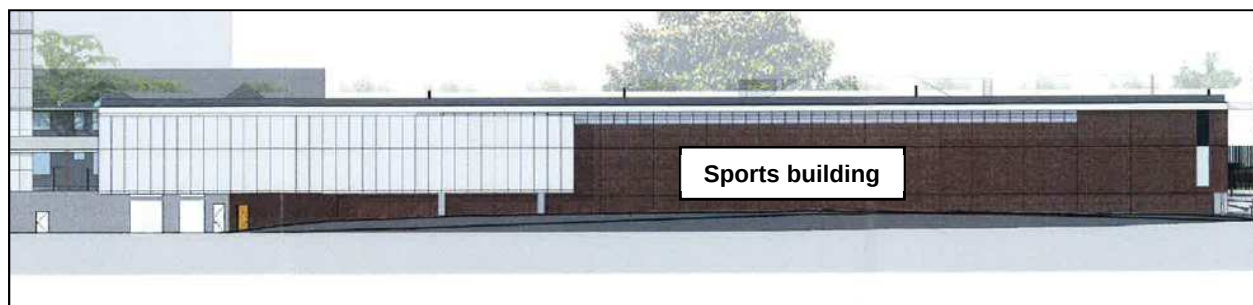


Figure 11 – Approved sports/movement complex north elevation (Source: DPE)

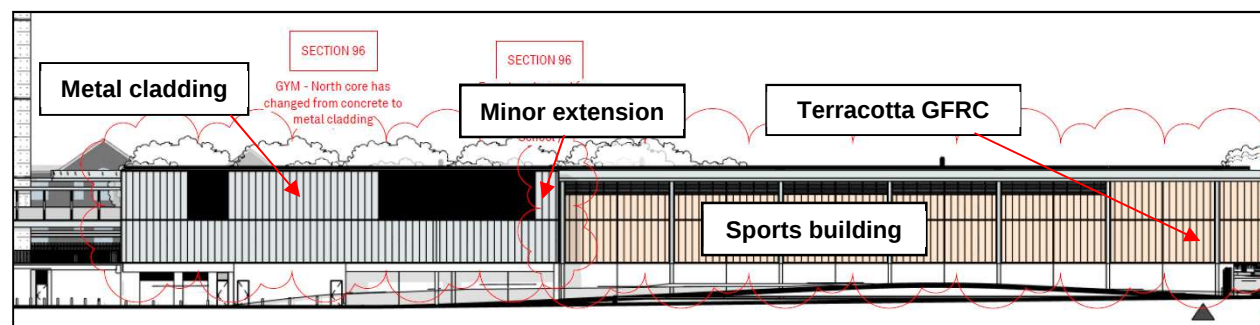


Figure 12 – Proposed sports/movement complex north elevation (Source: Applicant's Modification EIS)

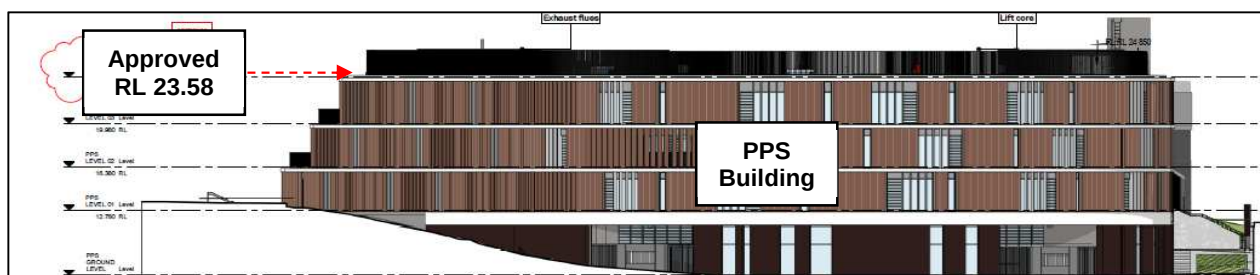


Figure 13 –Approved PPS building height (Source: DPE)



Figure 14 –Proposed PPS building height (Source: Applicant's Modification 3 EIS)

5. STATUTORY CONSIDERATION

5.1 Modification of Approval

Section 96(1A) of the EP&A Act requires the consent authority to be satisfied that the matters in **Table 2** are addressed in respect of all applications that seek modification approvals:

Table 2: Section 96(1A) matters for consideration

Section 96(1A) matters for consideration	Comment
That the proposed modification is of minimal environmental impact.	Section 7 of this report provides an assessment of the impacts associated with the proposal. The Department is satisfied that the proposed modifications will have minimal environmental impacts.
That the development to which the consent as modified relates is substantially the same development as the development for which	The proposed modification does not change the overall built form of the development or the use of any of the buildings. The modifications to the external

the consent was originally granted and before that consent as originally granted was modified (if at all).	facades of the tower building, sports complex, the PPS building and the landscaping amendments do not result in any additional adverse impacts on the surrounding area. The increase in height for both buildings is minor and would not be discernible from the public domain. The works associated with the service lane and the Barrack Lane frontage are proposed in response to conditions of consent. On this basis, the proposal would result in development that is substantially the same as the originally approved development.
The application has been notified in accordance with the regulations.	The modification application has been notified in accordance with the regulations. Details of the notification are provided in Section 6 of this report.
Any submission made concerning the proposed modification has been considered.	The Department received submission from the Heritage Council and the NSW Environment Protection Authority. Details of the consultation are provided in Section 6 of this report.

5.2 Environmental Planning Instruments (EPIs)

The following EPIs are relevant to the application:

- State Environmental Planning Policies (State and Regional Development) 2011
- State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017 (Education SEPP)
- State Environmental Planning Policies (Infrastructure) 2007
- Parramatta Local Environmental Plan 2011 (PLEP 2011).

The Department undertook a comprehensive assessment of the proposal against the above-mentioned EPIs in its original assessment. The Department has considered the above EPIs and is satisfied that the modification is generally consistent with the EPIs.

Further, pursuant to the savings and transitional provisions of Schedule 5 of the Educational SEPP, this policy does not apply to the modification application, as the time of the determination of SSD 7237 under Part 4 of the EP&A Act on 15 December 2016, the Education SEPP had not been gazetted or commenced.

5.3 Approval Authority

The Minister for Planning is the approval authority for the application. However, the Director, Modification Assessments may determine the application under delegation as:

- the local council has not made an objection
- a political disclosure statement has not been made
- there are no public submissions in the nature of objections.

6. CONSULTATION

The Department made the modification application publicly available on its website and referred the application to the City of Parramatta Council (Council), the Office of Environment and Heritage (OEH), Heritage Council and the NSW Environment Protection Authority (EPA). Given the minor nature of the modification request, it was not advertised or notified to any other agencies. A summary of the issues raised is provided below.

Heritage Council supports the proposed modification and provided the following comments:

- The proposed modifications to Arthur Phillip and Parramatta Public High Schools are minor and will not further impact the heritage significance of the heritage items on the site or within the vicinity of the site.
- An overview of the archaeological investigations and results of the Design Review by GML Heritage for the Early Works stage at the APHS notes that the works included extensive archaeological investigation and salvage of archaeological remains associated with the Parramatta Convict Barracks (1819-1930s). A Summary of archaeological findings

confirmed the archaeological remains of the Convict Barracks are extensive and generally intact and identified the presence of an Aboriginal archaeological site within the Parramatta Sand Sheet.

- Four areas of the proposed design changes to minimise impacts to State significant archaeology are identified in the EIS: retaining wall in Q2 could be repositioned; cut and fill areas in Q2 at the boundary with Q1 could be altered; grade for the proposed access road on the northern boundary and new road structure could be altered; and, public domain and planter boxes along Barrack Lane could be altered. These proposed positive design changes are supported.
- The scope of works to Arthur Phillip and Parramatta Public High Schools proposed under the Section 96(1A) application will not result in any additional impacts on the historical archaeological potential of the site.

EPA raised concerns with the modification application and provided the following comments:

- substituting metal for masonry cladding of part of the Arthur Phillip High School gymnasium may influence the character, quality and level of noise impacts on surrounding noise sensitive land uses, particularly during use of those facilities outside school hours
- additional cricket nets on the Parramatta Public School site at Smith Street may influence the character, quality and level of noise impacts on Western Sydney University, particularly during use of those facilities by external parties outside school hours.

OEH advised that no comments are required regarding Aboriginal Cultural Heritage at this stage of the modification as no assessment has been conducted yet.

No public submissions were received in relation to the modification application.

No submission was received from City of Parramatta Council.

6.1 Applicant's Response to Submissions

The applicant provided a Response to Submissions (RtS) report that responded to the issues raised by EPA regarding noise and clarified the nature of materials proposed for the PPS building.

The RtS was made publicly available on the Department's website. The Department has fully considered the applicant's response to issues raised in submissions in its assessment of the development as detailed in **Section 7** of this report.

7. ASSESSMENT

The Department has considered the Applicant's Modification 3 EIS in the context of the original approved development in its assessment of the proposal. The Department considers the key issues associated with the modification application are:

- built form
- heritage
- noise impacts.

7.1 Built Form

The modification application seeks approval to alter the following components of the approved built form:

- minor increase in height for both the APHS and the PPS buildings to accommodate roof structures and services
- amendments to external materials and finishes, design modification to the canopies, a bird proof netting to the roof of the APHS building and addition of elements such as turnstiles.

The proposed modifications would result in changes to the following design parameters:

	Approved	Proposed	Change +/-
Building Height (max)	APHS – 68.34m (17 storeys)	APHS – 68.85m (17 storeys)	+0.51m
	PPS – 18.76m (four storeys)	PPS – 18.98m (four storeys)	+ 0.22m

The Department notes that the height of the APHS building up to the roof would be within the 69m height limit applicable to the site. The flue height was approved above this height under the original application. The proposed modification would further increase this height by 320mm. However, the increase in height is minor in the context of the overall scale of the development, and will not be discernible from the public domain. The bird proof netting is an essential requirement to protect roof top plants and equipment and would not adversely impact upon the façade designs.

The external amendments to the ground level due to addition of glazing and turnstiles are minor variations that would not materially change the appearance of the building within the streetscape, whilst improving the functionality of the building.

The modification to the height of the PPS building is minor and will not be perceived when compared to the overall scale of the development. The amendments to the materials and finishes external changes would integrate the sports/movement building with the PPS building as consistent finishes are proposed.

The approved height of the buildings within the APHS and PPS sites have minimal overshadowing impacts on surrounding areas, including the heritage significant Lancer Barracks. The proposed increase in height is minor and would not have additional detrimental overshadowing impacts on the heritage listed item.

The Department has carefully considered the height, bulk and scale of the modified development and concludes that the proposed modifications will not adversely impact on the integration of the built form with the surrounds. The Department notes that minimal amenity impacts would be generated by overshadowing and supports the proposed modification to the bulk, scale and façade designs.

7.2 Heritage

Conditions of development consent (B4 to B8) required appropriate management of Aboriginal and European archaeological resources in accordance with the Archaeological Research Design (ARD). In response to the conditions of consent, the ARD was revised and the study area was divided into four principal quadrants, north western portion of the site, north of Macquarie Street (Q1), north-eastern portion (Q2), south-eastern portion, south of Macquarie Street (Q3) and south-western portion (Q4) as shown in the **Figure 15** below.

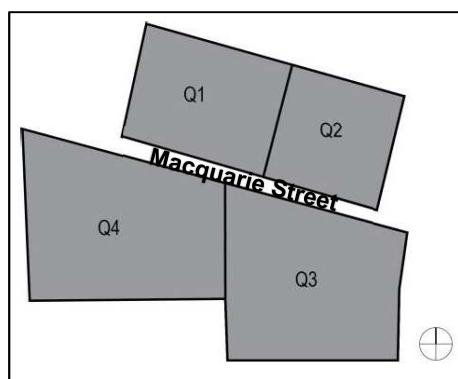


Figure 15 – The Quadrants identified in the ARD (source: Applicant's Modification 3 EIS)

Archaeological investigations, design review and salvage excavation in Q1 and Q2 has been undertaken in accordance with the conditions of consent. Summary of the archaeological findings are detailed below (see **Figure 16**):

- testing and detailed investigation confirmed presence of State significant archaeological remains of the Convict Barracks in Q1
- testing also identified an Aboriginal archaeological site within the Parramatta Sand Sheet in Q2
- the historical archaeological remains were found to be extensive and generally intact across Q1.

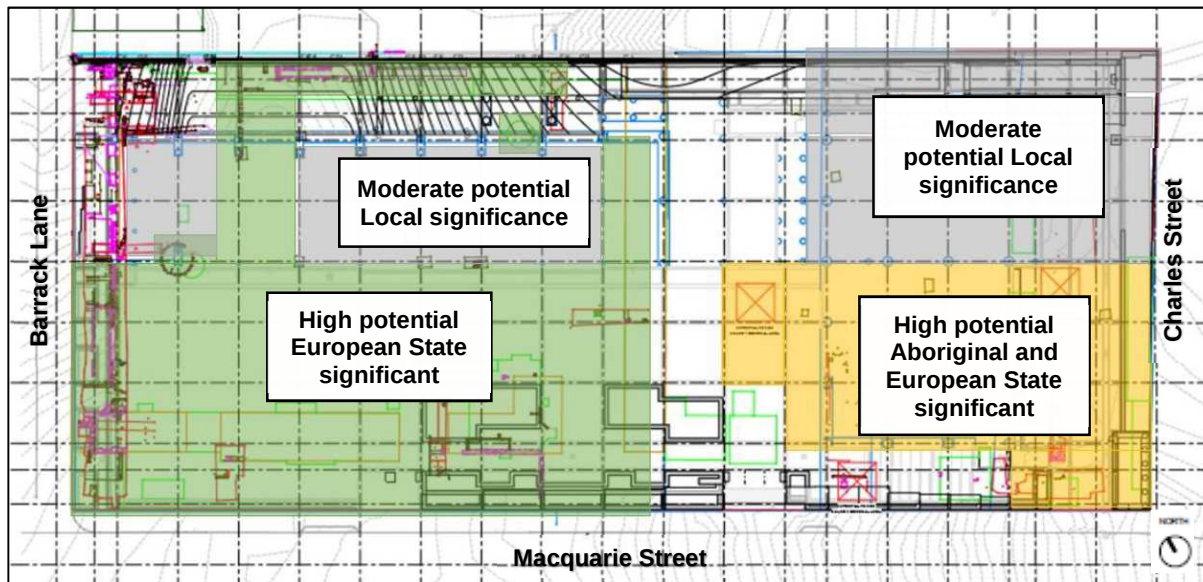


Figure 16 – Archaeological resources identified in Q1 and Q2 within the APHS site (Source: Applicant's Modification 3 EIS)

As a part of the design review and archaeological management works, the following amendments to the design were identified:

- retaining wall in Q2 could be repositioned to avoid the Aboriginal archaeological site
- cut / fill areas in Q2 at the boundary with Q1 could be altered to maximise conservation of the remains of the western wing of the Convict Barracks
- grade for the new access road on the northern boundary and new road structure could be altered to reduce impacts and partially retain state significant convict saw pits
- public domain and planter boxes design along Barrack Lane could be altered to avoid impact to state significant Convict Barracks eastern wing building remains.

In response to the above recommendations, the levels of the pathway along the Barrack Lane frontage have been raised and stairs introduced in front of the café (**Figures 17 and 18**).

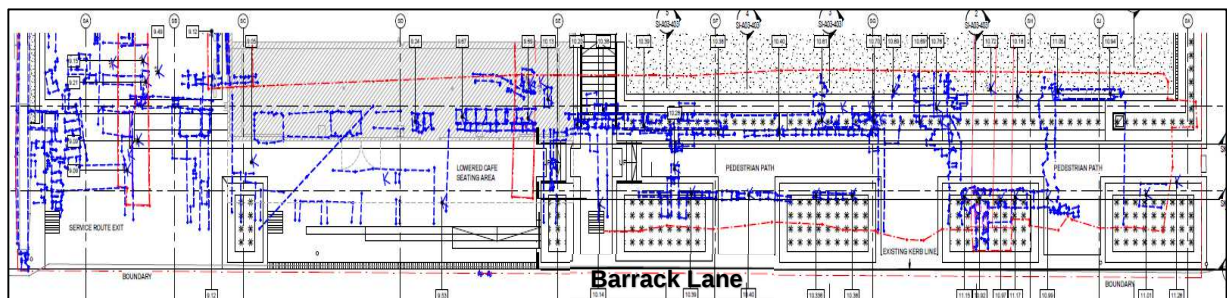


Figure 17 – Archaeological overlay plan identifying the resources along the Barrack Lane frontage within the APHS site (marked in blue and dashed) (Source: Applicant's Modification 3 EIS)

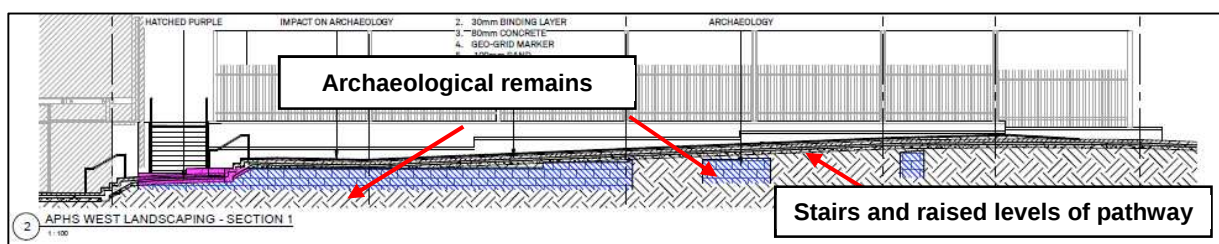


Figure 18 – Proposed design modifications to the public domain along Barrack Lane frontage to retain archaeological remains (remains shown in blue) (Source: Applicant's Modification 3 EIS)

Additionally, the grades of the service lane along the northern boundary have been raised and alternative construction techniques introduced to retain significant saw pits wherever possible whilst maintaining an accessible grade between Charles Street and Barrack Lane (**Figure 19**).

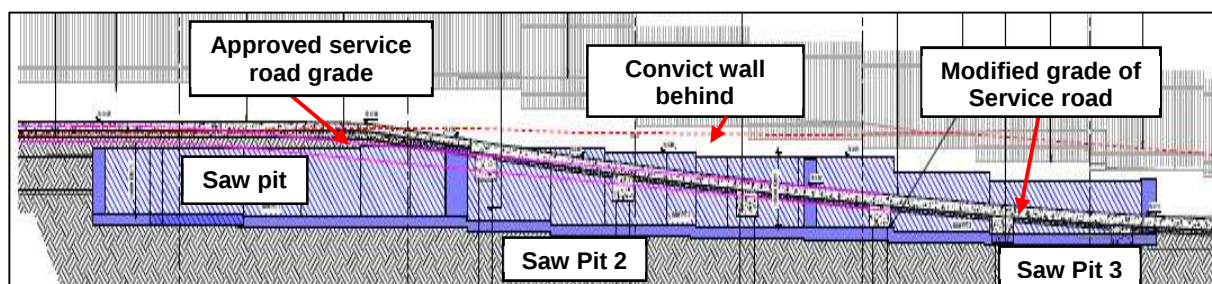


Figure 19 – Approved gradient (pink dashed) and modified gradient of service road (Archaeological remains shown in blue) (Source: Applicant's Modification 3 EIS)

The design review process involved input from the Department of Education, the relevant expert consultants and OEH.

The Department has reviewed the proposed amendments and considered Heritage Council's comments and is satisfied that the proposed amendments to the design would reduce potential adverse impacts on significant archaeological elements whilst resulting in minor impact on the streetscape and the surrounding built environment.

7.3 Landscaping

The details of the proposed landscaping components within the APHS and PPS sites are detailed in **Figures 20** and **21**.

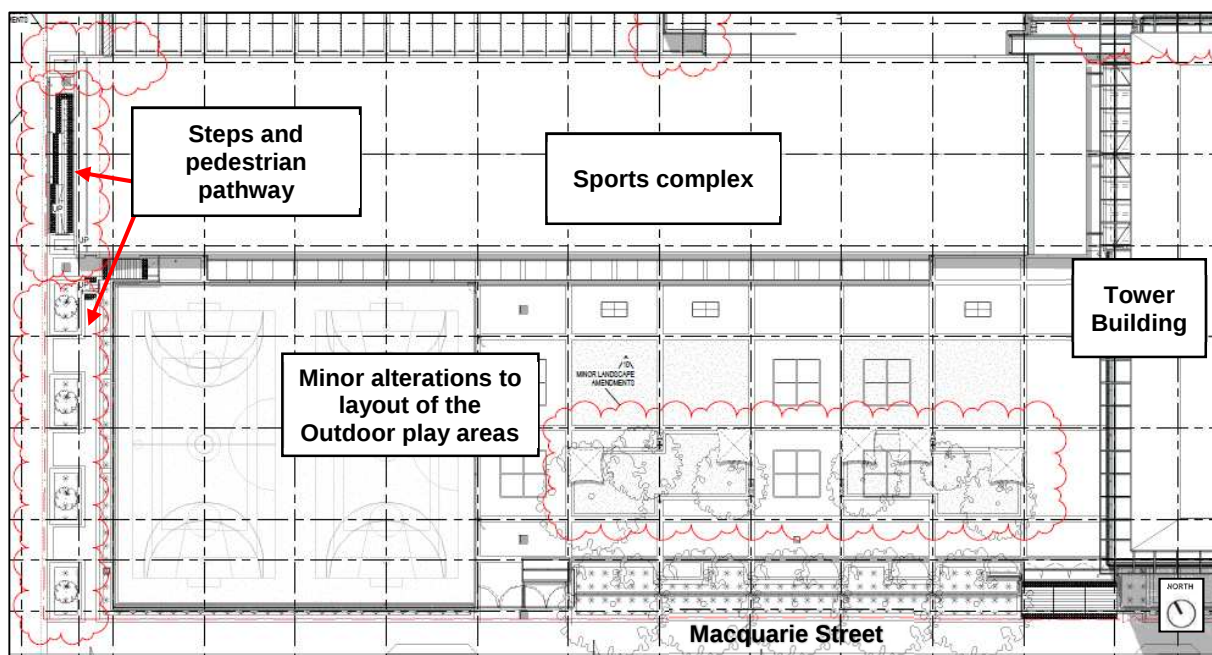


Figure 20 – Proposed modifications to the landscaped areas within the APHS site (Source: Applicant's Modification 3 EIS)

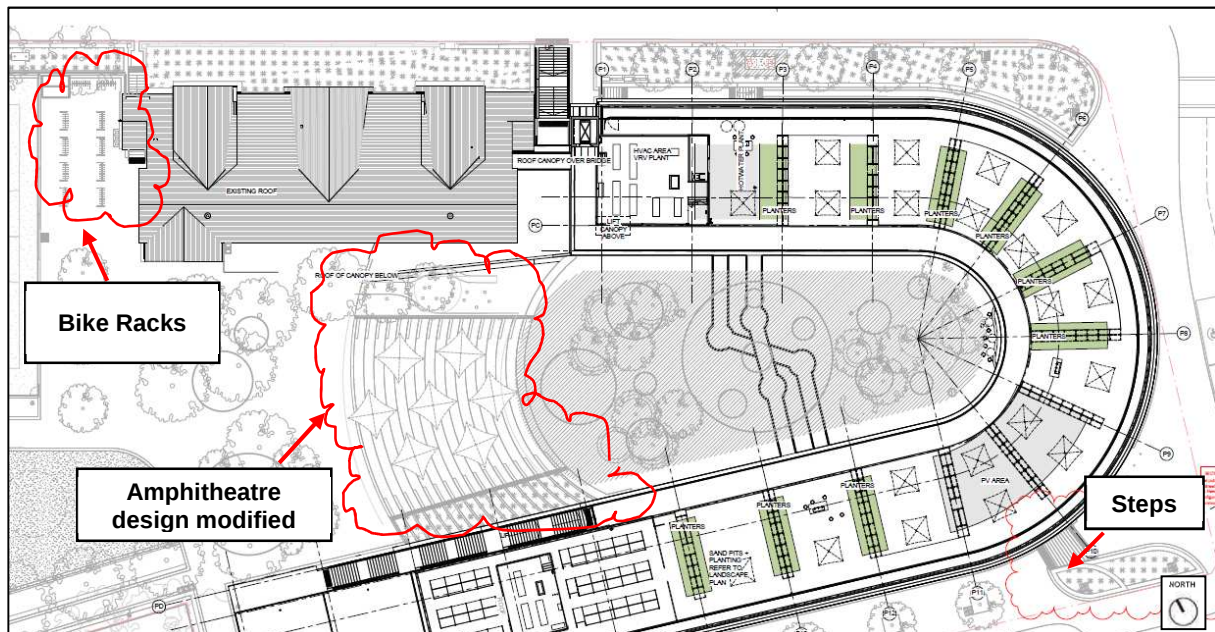


Figure 21 – Proposed modifications to the landscaped areas within the PPS site (Source: Applicant's Modification 3 EIS)

The proposed modifications to the landscaped areas and public domain are minor and would not have any impact on the overall site planning or the approved layout. The Department is satisfied that the proposed changes would improve the amenity and utilisation of the approved outdoor spaces.

7.4 Noise

The proposed amendments to the design would not result in any modifications to the operation of the school.

The EPA raised concerns regarding the potential noise impact generated by the amendments to the materials of the sports/movement complex and the addition of cricket nets that may be used outside school hours. In response to the EPA's concerns, the Applicant's RtS included the following comments:

- the proposed metal cladding finish for the northern core of the sports/movement complex will comprise 4mm metal sheet, 248mm cavity with 50mm fibreglass insulation (18kg/m³) and 13mm plasterboard
- at the upper ground level, store rooms/equipment rooms are located along the northern façade and will act as a buffer to the noise generated by sports activities
- the applicant's Acoustic consultant has calculated the noise received at the nearest sensitive receiver from a plant room located adjoining the northern façade on Level 1 and concluded that the noise levels meet the relevant criteria
- the proposed cricket nets would be 'exempt development' under clause 38 of SEPP (Education Establishments and Child Care Facilities) and would comply with Clause 17 – General Requirements for Exempt Development (BCA requirements and minimal impact to the heritage item).

The Department has considered the Applicant's RtS document in detail. It is acknowledged that the existing schools are located within a highly urbanised inner-city environment and any additional noise generated due to the modifications to the building materials or operation of the cricket nets can be managed to comply with the relevant criteria. As such, the Acoustic Report submitted with the SSD application advised that further assessment of mechanical plant would be undertaken when selected, but would be appropriately noise controlled and acoustically treated to ensure compliance with the Industrial Noise Policy. The conditions of development consent require the Applicant to prepare an operational management plan for the schools and specific management plans for large events/community uses (i.e. attended by greater than 100

persons) to ensure that the operation of the school always is appropriately managed to minimise any potential impacts.

The Department has also recommended conditions requiring the applicant undertake a noise monitoring program of the mechanical plant within 60 days of the commencement of use of both schools to verify that the measured noise levels of the mechanical plant do not exceed the established noise criteria. Given the existing conditions of consent, the additional noise generated (if any) due to replacement of masonry by metal cladding can be appropriately managed.

8. CONCLUSION

The Department has assessed the modification application and supporting information in accordance with the relevant requirements of the EP&A Act. The Department's assessment concludes that the proposed modifications are appropriate on the basis that:

- the amendments to the height and external finishes do not have any detrimental impact upon the overall built form or envelope of the building
- the modifications facilitate a design outcome that accommodates the essential services and include consistent building materials and finishes
- the amendments to the public domain and regrading the driveway will allow retention of the significant archaeological elements located on the site
- the public domain works will improve the landscaped settings for both the school sites
- the application will be subject to suitable conditions of consent that would appropriately manage and mitigate the heritage and noise impacts associated with the proposal.

Consequently, it is recommended that the modification application be approved subject to the recommended conditions.

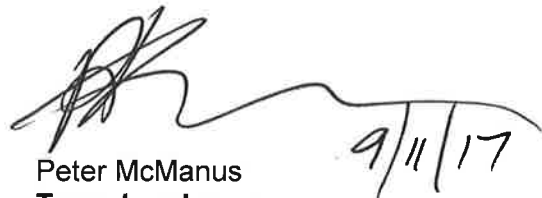
9. RECOMMENDATION

It is RECOMMENDED that the Director, Social and Other Infrastructure Assessments as delegate of the Minister for Planning:

- **considers** the findings and recommendations of this report;
- **approves** the application under section 96 (1A), subject to conditions; and
- **signs** the notice of modification (**Appendix A**).



Aditi Coomar 9/11/2017
Senior Planner
School Infrastructure Assessments



Peter McManus 9/11/17
Team Leader
School Infrastructure Assessments

APPENDIX A: NOTICE OF MODIFICATION

A copy of the notice of modification can be found on the Department's website at:

http://www.majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=8732

APPENDIX B: SUPPORTING INFORMATION

The following supporting documents and supporting information to this assessment report can be found on the Department of Planning and Environment's website as follows:

1. Modification request

http://www.majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=8732

2. Submissions

http://www.majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=8732
