



Conrad Gargett

Response to Submissions Report

Alterations and Additions to Parramatta West Public School
Auburn & Young Streets, Parramatta

11 October 2019

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Rev No.	Status	Date	Comments
1	Draft	12/03/2019	
2	Amended Draft	29/05/2019	
3	Amended based on SINSW Comments	25/06/2019	
4	Further amendments following SINSW Changes	13/08/2019	
5	Final	04/09/2019	
6	Amended Final	17/09/2019	DPIE comments
7	Amended Final to resubmit	11/10/2019	Additional Information

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TABLE OF CONTENTS

Page numbers

1	Introduction	6
1.1	Site and Proposal	6
1.2	Approach to Responding to Submissions	6
2	Outcome of Submissions & Conclusion	8
3	Detailed Responses	9
3.1	Department of Planning, Industry and Environment.....	9
3.2	Environment Protection Authority (EPA).....	28
3.3	Transport – Roads and Maritime Services	49
3.4	NSW Office of Environment and Heritage (OEH) – Heritage Division	50
3.5	Transport for NSW	52
3.6	Government Architect NSW	58
3.7	Office of Environment and Heritage	64
3.8	Sydney Water	68
3.9	Parramatta City Council	69
3.10	Public Submissions	80

Table of Contents

Page numbers

List of Figures

Figure 1: Tuflow Model Results from PMF (Source: Lyall & Associates)	22
Figure 2: Sketch showing connectivity and advantages of proposed building location (Source: Conrad Gargett)	23
Figure 3: Annotated extract of proposed play space plan – South Site	24
Figure 4: Extract of Proposed parking and drop-off and pick-up zones from Traffic Assessment by ARUP (Figure 30)	25
Figure 5: Location of nearby open space in relation to Parramatta West Public School	26
Figure 6: Extract of School Catchment Plan showing changes (Source: DoE)	27
Figure 7: Crimea Street indicative Bus Zone from Amended TIA (Source: ARUP – Figure 31)	57
Figure 8: Tree Canopy Calculations for North Site (Source: Conrad Gargett)	63
Figure 9: Section of North Elevation	79
Figure 10: Extract of Consultation Outcomes Report – Letter Box Drop Plan (Source: Barker Ryan Stewart)	89

List of Tables

Table 1: Submissions from Department of Planning, Industry and Environment	9
Table 2: Submissions from EPA	28
Table 3: Submissions from RMS	49
Table 4: Submissions from NSW Office of Environment and Heritage (OEH) – Heritage Division	50
Table 5: Submissions from Transport for NSW	52
Table 6: Submissions from GA NSW	58
Table 7: Submissions from Office of Environment and Heritage	64
Table 8: Submissions from Sydney Water	68
Table 9: Submissions from Parramatta City Council	69
Table 10: Public Submissions	80

Table of Contents

Appendices

Appendix A – Aboriginal Cultural Heritage Assessment Report
Appendix B – Analysis of Feasible Alternative Options
Appendix C – Amended View Assessment
Appendix D – Amended Noise and Vibration Impact Assessment
Appendix E – Additional Diagrams
Appendix F – Historical Archaeological Assessment
Appendix G – Amended Social Impact Assessment
Appendix H – Updated Architectural / Development Plan Set
Appendix I – Amended CPTED Report
Appendix J – Amended Landscape Plans
Appendix K – Amended Transport Assessment
Appendix L – Waste Docket
Appendix M – Asbestos Register
Appendix N – Interim Audit Advice

1 Introduction

An Environmental Impact Statement (EIS) was prepared by Barker Ryan Stewart on behalf of the NSW Department of Education (DoE) to support an application for State Significant Development (SSD No 8790) at Parramatta West Public School. This report provides DoE's response to the agency and public submissions received in relation to the proposal.

1.1 Site and Proposal

Parramatta West Public School is located off Railway and Auburn Streets, Parramatta and comprises three (3) lots described as Lot 2 DP 1113697, Lot 407 DP 729082 and Lot 406 DP 729083.

The SSD application and EIS proposes alterations to the existing school (south site) and expansion of the school on the existing playground area on the northern side of Railway Street (north site). The expansion of the school will provide permanent classroom spaces to ensure the school can accommodate up to 961 students. The proposal, as amended by this response to submissions seeks to:

- Construct a new single storey hall on the north site to replace the existing hall on the south site;
- Alter the existing hall on the south site to create two new home-bases;
- Construct a new building comprising ten new home-bases on the north site;
- Construct a new building comprising administration, canteen, staff areas and six new home-bases on the north site;
- Alter the existing administration / staff area on the south site to create two new home-bases and satellite administration areas; and
- Create outdoor learning and landscaped areas on the north site.

1.2 Approach to Responding to Submissions

The SSD application was placed on public exhibition for 28 days from 20 September 2018 to 18 October 2018. Government agencies were also given the opportunity to provide comment. Four (4) public submissions (two from the one person) in the form of objections, were received from adjoining or nearby residents and landowners.

In summary, the public submissions raised concerns with the potential visual, solar access, privacy, noise, stormwater management, traffic and construction impacts of the proposal. In addition, the public submissions raised concerns with the proposed variation to the height limit applicable under the Holroyd Local Environmental Plan 2013 (9 metres (m) permitted, 10.697 m maximum in part proposed), the location of the proposed building on the north site, as well as the extent of consultation undertaken during the design development phase of the project.

Submissions were also received from the following government agencies:

- NSW Office of Environment and Heritage (OEH) x two submissions;
- NSW Environment Protection Authority (EPA);
- Roads and Maritime Services (RMS);
- Sydney Water;
- Government Architect NSW;
- Transport for NSW; and
- City of Parramatta Council.

The key issues raised in the agency submissions included potential for environmental amenity impacts associated with the proposal, Aboriginal archaeology and the impact of development on potential places of significance, land contamination and remediation, traffic impacts associated with student drop off and pick up locations and potential social impacts associated with the loss of available play space as a result of the development of the north site.

The following changes have been made to the proposal to respond to the issues raised in the agency and public submissions and in response to more detailed design investigations:

- Revised fencing locations;
- Addition of new plant and enclosure adjacent the northern boundary of the north site;
- Internal layout reconfiguration of the multipurpose hall and reconfiguration of the roof to further articulate the built form;
- Confirmation of eastern side setbacks;
- Reduction in the height of the entrance canopy at the southern entry of the proposed administration building on the north site;
- Investigate options for the glazing of the east facing windows on the north site to reduce overlooking of neighbours, such as frosting, translucent film, or similar; and
- Reduction in the number of yarning circles along the eastern boundary of the north site.

The changes have been highlighted by red clouds on the plans included in Appendix H.

DoE have confirmed that following construction and occupation of the new buildings on the north site, the majority of the demountables will be removed from the south site and the play space and car parking (14 spaces) reinstated. This will be undertaken as a separate process to this application.

The following technical reports have been prepared to respond to the issues raised in the agency and public submissions and to assess the potential environmental impacts of the proposal:

- Aboriginal Cultural Heritage Assessment Report (see Appendix A).
- Additional analysis of feasible alternatives to the proposed location of the school (see Appendix B).
- Amended View Assessment (see Appendix C),
- Revised Acoustic Assessment (see Appendix D),
- Supplementary diagrams and additional/revised architectural drawings (see Appendix E),
- Amended Landscape Plan (see Appendix J),
- Historical Archaeological Assessment (see Appendix F),
- Revised Social Impact Assessment (see Appendix G),
- Amended package of development plans (see Appendix H),
- Revised CPTED Report (see Appendix I),
- Amended Traffic Impact Assessment (see Appendix K), and
- Interim Audit Advice from an Independent Site Auditor relating to the potential contamination of the site (see Appendix N).

In response to the contamination and remediation issues, DOE engaged an EPA Accredited Site Auditor (Michael Dunbavan from Coffey) to review the proposed capping strategy as part of a Site Audit Report. Interim Audit Advice is now available which recommended the following:

- *No placement of additional fill material or marker layer, and*
- *Review of the School's current Asbestos Management Plan to ensure regular (at least annual) site inspections by a person competent to identify Bonded ACM in surface soil with removal of any visible Bonded ACM fragments is included as a risk management measure.*

The detailed advice is included in Appendix N of this report. It is understood that the Department of Planning Industry and Environment (DPIE) will now undertake the appropriate consultation with Council and the EPA.

2 Outcome of Submissions & Conclusion

Concerns raised in the agency and public submissions have been addressed through amended architectural plans and amended or additional technical reporting. Amendments to the design of the north site proposal are a direct response to potential amenity concerns raised in the submissions. Based on the assessment of the revised proposal within attached documentation and this Response to Submissions report, the proposed development will not result in any significant unacceptable impacts to the amenity of surrounding development or the nearby neighbourhood.

Key issues associated with cultural heritage, visual and environmental impact, traffic and parking, contamination and social impacts have been considered and addressed and the proposal and the accompanying information have been supplemented and refined, where appropriate, to respond to stakeholder comments and concerns. Section 3 includes detailed responses to the concerns raised in the submissions.

The proposal will result in a high-quality educational environment for students and staff and the amended design warrants the support of the Minister. The submitted EIS and this Response to Submissions (RtS) Report confirm that there are no significant adverse impacts associated with the proposal and the development should be approved, subject to appropriate conditions.

3 Detailed Responses

3.1 Department of Planning, Industry and Environment

Table 1: Submissions from Department of Planning, Industry and Environment

Note: R+S – Response to Submissions

No	Submission Detail	Response
1a	The submitted Statement of Heritage Impact identifies that the northern section of the site is vacant of structures and appears undisturbed. The Office of Environment and Heritage (OEH) have reviewed the EIS and considers that an Aboriginal Cultural Heritage Assessment Report (ACHAR) is required to be prepared, given the extent of excavation works proposed and the history of the site. Details of the requirements to prepare an ACHAR is provided in Attachment 1 of the comments from OEH, attached to this letter.	An ACHAR has been prepared and is included as Appendix A. The assessment concluded that the site has low Aboriginal archaeological sensitivity and based on the extent of ground disturbance it is unlikely that further archaeological assessment of the area will be required. The report recommends that the school develops an Aboriginal heritage interpretation strategy to acknowledge the Darug people and the land on which the school stands. DoE will develop and implement an Aboriginal Heritage Interpretation Strategy as per the recommendations of the ACHAR prior to occupation of the new and refurbished facilities.
1b	The Department requires the Response to Submissions (R+S) to include an ACHAR in accordance with the Guide to investigating, assessing and reporting on Aboriginal Cultural Heritage in NSW (OEH, 2011) and Aboriginal cultural heritage consultation requirements for proponents 2010 (DECCW).	An ACHAR has been prepared and is included as Appendix A. Refer to comment in response to No 1a above.
1c	The Department notes that the location of proposed new school building may have adverse environmental amenity impacts on the adjoining residents to the east, due to visual privacy, overshadowing, noise and view loss. Section 4.6 of the EIS includes an analysis of feasible alternatives to justify the proposed location of the new building. However, the analysis does not include any consideration of the impact of the proposed siting of the building on the environmental amenity of the neighbouring residents.	The options analysis has been revised to consider the potential visual privacy, overshadowing and noise impacts of the proposal on the residential premises to the east of the north site (Refer to Appendix B). In addition, a revised view assessment has been prepared to quantify the visual impacts of the proposal at the residential premises immediately adjacent to the north site (Refer to Appendix C). The revised options analysis demonstrates the proposal would not result in any unreasonable amenity impacts at the premises immediately east of the north site on the basis that:

No	Submission Detail	Response
		• The shadow diagrams demonstrate the adjoining premises will receive a minimum of three hours solar access at the winter solstice, which is consistent with the minimum standards identified in the Holroyd Development Control Plan (DCP) 2013; • The proposal would provide an acceptable level of visual privacy, with the proposed buildings on the north site achieving a setback of 7-10 m from eastern boundary. This would ensure a minimum separation distance between the proposed buildings and the existing residential premises of 19m to 22m. In addition, to further mitigate any potential privacy impacts, the proposal includes significant landscaping and trees along the boundary and has been redesigned to incorporate options for increasing privacy, such as fixed frosted glass, translucent film or similar on the eastern elevation of the proposed building in addition to the existing pop-out angled windows (see an option included Appendix E – Drawing 1); • The revised Landscape Plan would ensure the proposed building on the north site would be partially screened from the adjoining residential premises through the use of additional plants and trees; • An updated view assessment, as mentioned above, has been prepared that confirms the loss of views is not significant (Refer to Appendix C); • The proposed buildings have been sited to shield dwellings from potential noise from play areas as shown in the noise assessment (Refer to revised document in Appendix D); and • Reduction of yarning circles to only two within the setback, which will be fully supervised by staff and teachers. (Refer to updated plans in Appendix H and J)
1d	Siting the proposed building along the western boundary of the existing oval / open space would increase the distance between the school and the adjoining residences on Franklin Street (east). This would assist in addressing the potential adverse environmental amenity impacts on the neighbouring residents.	The western portion of the north site includes an area that is impacted by localised overland flow / flooding as detailed in the Flooding Assessment provided in Appendix S of the EIS. An extract of the Probable Maximum Flood (PMF) mapping (Figure 7 of the flooding assessment) is included below as Figure 1. As this portion

No	Submission Detail	Response
		of the site is potentially not safe for children, and unsuitable for building construction, this option was not considered viable. The location to the east provided: • A safer option for children as it was located out of the flood area, • A more appropriate link to the existing school site in terms of safety and efficiency for the school and students including the pedestrian crossing, • A better connection of the permanent school buildings, • A linkage between the open space play areas, and • A buffer between the dwellings and the play area, which would assist in screening the playground noise and providing an increased level of privacy to the residents. Refer to sketch in Figure 2 below.
1e	The Department requires that an alternate design option of locating the proposed new school building along the western boundary of the existing oval / open space, be analysed. The RTS should include satisfactory justification as to why this section of the site is not suitable for locating the building.	As indicated in response to point 1d above, this location was not considered a viable option for the following reasons: • Potential flooding impacts; • Lack of connection to existing school buildings; • Fragmentation of open / green spaces; • The western portion of the site does not coordinate with the current safe and efficient road crossing between the north and south sites; and • It does not provide residents to the east with any acoustic buffering to playground noise.
1f	The Traffic Report (TIA) supporting the EIS proposes several locations around the school that may be utilised for student drop-off and pick-up and concludes that a total of 38 cars can be potentially accommodated in these locations. However, no justification has been provided to address whether 38 cars would be sufficient to cater for the total number of students and what is the maximum time for which one car is expected to occupy each space.	The Traffic Assessment (TIA) has been amended and is included in Appendix K. Section 3.1.3 of the TIA addresses the proposed drop off and pick up scenarios with the increased student numbers. The morning arrival drop-off generally occurs over a one hour period from 8.00-9.00am. The TIA analysed the arrival profile of vehicles accessing the school in 5 minute intervals. This analysis confirmed the peak currently occurs in the 5 minutes around 8.45am, where 60 vehicles access the site. Additional observations undertaken by the traffic engineer confirmed each drop-off movement took approximately 1 minute to complete.

No	Submission Detail	Response
		The TIA also included predictive analysis of the future arrival profile, based on an additional 13 teaching spaces and 195 student places. This analysis concluded the busiest 5 minute drop off period would occur around 8:40 am, with up to 80 vehicles potentially accessing the site. Based on the average drop-off time observed by the traffic engineer, the proposed changes to the site drop-off arrangements, and future student and teacher numbers, the 38 proposed spaces (shown as green and pink in Figure 4 below) are capable of servicing the 19 additional movements (i.e. total of 80 movements) predicted to occur around the 8:40 am peak. The pick-up period is much shorter occurring between 2:40pm and 3.15pm. Currently the peak pick-up period occurs around 2:55pm, with up to 80 cars accessing the site. This is expected to increase to about 100 cars at the peak. The proposed arrangements include 'No Parking' zones which are able to be used by cars who will drive by to pick-up students. Many parents will use spaces further along each street which are unrestricted where they can park and walk to the school similar to current behaviour. The 38 proposed spaces therefore have capacity to service 190 cars for pick-up (assuming 1 minute turnaround) which is in excess of the expected peak activity (100 movements). There is extensive unrestricted kerb space surrounding the school as shown in Figure 4 below, including a total of 218 spaces. Based on the survey of streets surrounding the school, the general occupation of these spaces is about 37% which leaves at least 137 spaces free for parents to park. An amended TIA has been prepared and is included as Appendix K.
1g	The TIA does not include a queuing analysis to assess the traffic impacts that would occur when the proposed drop-off and pick-up zones are at capacity. Further assessment of potential impacts at the Railway Street / Franklin Street intersection should be conducted considering a scenario where the designated drop-off and pick-up zone on Railway Street experiences delay and vehicle queuing in the AM and PM peak periods.	There is extensive kerb space available during drop-off and pick-up times on the streets surrounding the school as detailed in the response to Point 1f above. Whilst formal zones are proposed for the higher turnover activity, many parents choose to park and wait. Parents will be encouraged not to wait in the traffic lanes but proceed to the nearest available kerbside space as shown in Figure 4 below.

No	Submission Detail	Response
		The TIA included the number of additional vehicles that would be generated as part of the proposal and although no specific queuing analysis was undertaken, the assessment does consider the efficiency improvements achieved by having dedicated drop-off and pick-up bays. The analysis was not considered necessary as these are all local streets with no through traffic and minimal background traffic. During inspections of the drop-off and pick up scenarios, there was no evidence of queuing as there were no formal points for this to occur. Vehicles parked where they were able to in order to pick-up or drop-off their children. An amended TIA has been prepared and is included as Appendix K.
1h	The Department requires that the TIA be amended to include a robust assessment of the proposed scenario of student drop-off and pick-up. The TIA must include recommendations for lengths of the proposed drop-off and pick-up locations, number of cars that can be accommodated at each location, estimated drop-off and pick-up times, additional signposting and traffic management measures. The RfS should include a site plan with the proposed drop-off zones and the details of the additional traffic measures including parking restrictions and signs.	The TIA provided with the EIS included a detailed assessment of the drop-off and pick-up scenarios. In addition, it included SIDRA analysis of the existing and future performance of the Pitt Street/Railway Street intersection and measures for the management of the traffic as a result of the proposed development. The proposed location, sign posting and number of bays to be provided in each drop-off and pick-up zone are provided at Section 3.1.2 and Figure 30 (shown as Figure 4 below) of the amended TIA included in Appendix K. Given the above, no further traffic assessment has been undertaken. It should be noted that the school has recently been working with Council to provide additional school pick-up zones for the current school year, as no specific drop-off and pick-up zones had previously been provided. The detailed design of these facilities will be coordinated with Parramatta City Council during the construction documentation stage of the project. This in conjunction with parent education will provide a safer and more sustainable pick-up and drop-off scenario for the school. It should be noted that there are 218 unrestricted spaces surrounding the school sites as shown in Figure 4 below (which is an extract from the TIA – Figure 30). An amended TIA has been prepared and is included as Appendix K.

No	Submission Detail	Response
1i	The TIA must also include details of connections from the drop-off and pick-up zones to the school buildings. Weather protected pedestrian connections should be provided for students to encourage utilisation of these zones.	Weather protected pedestrian connections are not proposed to be provided in the public domain. However, the proposed school buildings on the north site will provide appropriate weather protection to the access gates to the north and south.
1j	While the application includes a Green Travel Plan, it is noted that 87% of the staff use private vehicles as their principal mode of transport. The proposed expansion of the school includes no on-site car parking provisions for the staff members and the EIS provides inadequate justification for the lack of on-site staff car parking.	The TIA included a survey of existing staff car parking arrangements. This survey concluded staff car parking currently occurs on the surrounding residential streets. In addition, the TIA concluded this arrangement was acceptable on the basis that Auburn Street contained 90 unoccupied spaces from a pool of 165 in the immediate streets (Refer to Figure 4), and therefore car parking for the 11 additional staff could be accommodated on Auburn Street without any adverse impacts to local residents. These figures do not include the spaces along Crimea Street or the northern part of Franklin Street which would also be available. The Amended TIA shows a total of 260 unrestricted spaces, with only 96 occupied on the day of the survey in the immediate streets surrounding both of the school sites. DoE has reviewed the findings of the TIA and has concluded that given there are surplus car parking spaces available on Auburn Street, it would be beneficial to utilise existing land on site for educational purposes (i.e. classrooms and play space) in lieu of staff car parking. Notwithstanding this, it is proposed to remove the demountables and reinstate the car park (14 spaces) following the occupation of the new buildings on the north site.
1k	The Department requires that adequate on-site car parking be provided on the site to cater for the demand generated by the development and to minimise the detrimental impacts on the surrounding streets. In this regard, the Department notes that nine demountable buildings are proposed to be removed from the site resulting in additional space within the site that can be used for future on-site car parking.	As outlined above, the traffic surveys undertaken to prepare the TIA concluded there are surplus on-street car parking spaces available in the locality (i.e. on Auburn Street), and therefore staff car parking could continue to occur off-site without generating any adverse impacts on surrounding residential streets. Notwithstanding this, it is proposed to remove the demountables and reinstate the car park (14 spaces) following the occupation of the new buildings on the north site.
1l	The Green Travel Plan submitted with the EIS fails to provide any meaningful details or incentives that would assist in increasing the use of alternate travel modes. A Workplace Travel Plan (WTP) is	The outline Green Travel Plan prepared to accompany the transport assessment sets a realistic target reduction in staff car

No	Submission Detail	Response
	required to be provided detailing site-specific measures that would be implemented to promote and maximise the use of more sustainable alternate travel modes. The WTP should include: - objectives and targets (i.e. site-specific, measurable, achievable and timeframes for implementation) to define the direction and purpose of the WTP - actions and incentives to achieve the objectives - measures to promote and support the implementation of the plan - a process for monitoring and review that allows for the effectiveness of the WTP to be measured.	travel mode from 87% to 70%. This target will need to be confirmed in consultation with the school and staff. This plan recommends: - Provision of a Green Travel Plan Information Package to all staff which would include information on incentives to use sustainable means of transport e.g. pool bikes and car/taxi share system. - Set up a journey to/from school car share system for all staff who are willing to participate in the scheme. - Introduce a taxi or pool car share system for trips during the day for staff. The outline Green Travel Plan provides the framework for the school to implement a site specific Green Travel Plan for the school and specific initiatives. The school will need to set up a coordinator/committee to work out what strategies they want to adopt. A site specific Green Travel Plan will be prepared and implemented prior to the occupation of the new and refurbished facilities.
1m	Section 10 of the EIS (View Impacts) indicates that the views from the rear yards of the residences on Franklin Street are currently filtered due to an existing solid fence. However, sky views and distant district views would still be impacted upon by the proposed new school building within 7m of the rear boundary of these residences. The view impact assessment concludes that there will be no significant adverse impacts due to view loss. However, sufficient justification has not been provided to support this conclusion.	The impacts on views from the rear yards of the residences which adjoin the north school site along Franklin Street have been assessed in an amended view assessment. The view assessment has been prepared using the Land and Environment Court (LEC) Planning Principles based on the case, <i>Tenacity Consulting v Warringah Council</i> [2004] NSWLEC 140 at 25-29. The amended assessment has been included in Appendix C and concludes that it is unlikely that there will be significant adverse impacts from loss of views on the adjoining dwellings to the east and the proposed development is considered reasonable. In reaching the conclusion above, the assessment considered the following: - Current views from the adjoining premises on Franklin Street are considered to comprise filtered local views of an existing school playing field and Council reserve beyond. - With the exception of one two storey dwelling, the remaining dwellings are single storey and views would only be obtained

No	Submission Detail	Response
		from the rear of these properties. Due to the location of existing 2 m high fences and other ancillary structures, views from the rear of these properties would currently comprise views of trees with sky beyond. Whilst these views would be pleasant, they are not iconic. • The proposed development has the potential to impact views from eye level to sky level, which predominantly comprise views of vegetation. These views would be impacted by the proposed building as filtered views. • Views from windows on the upper level of the two storey dwelling may comprise views to open space, however these would be filtered through the tree canopy. Whilst these views are pleasant, they are not iconic. These views would be impacted by the proposed building as filtered views. The visual impacts of the proposal upon the adjoining residential premises on Franklin Street are considered reasonable on the basis the proposal complies with the height limit at the boundary, includes a setback of over 7m and includes additional landscaping along the boundary to retain landscaped views at the affected properties. Further, the proposed development would result in an improved outcome in comparison to a standard residential development permitted in the zone on the basis that residential developments are permitted 900 mm from the boundary and could result in more significant view loss. Further details of the assessment have been included in Appendix C.
1n	The Department requires that the view impact assessment (VIA) be updated to include more detailed analysis of the impact of the proposal on the private views for the residents on Franklin Street, consistent with the established Planning Principles at the Land and Environment Court, in the judgement for <i>Tenacity Consulting v Warringah [2004] NSWLEC 140 (Principles of view sharing: the impact on neighbours)</i>. The VIA must include a detailed analysis of the degree of visual impact that would be experienced from the rear of the existing residences along Franklin Street.	Refer to comment in response to point 1m above. The amended assessment has been included in Appendix C and concludes that it is unlikely that there will be significant adverse impacts from loss of views on the adjoining dwellings to the east and the proposed development is considered reasonable.

No	Submission Detail	Response
1o	The Noise and Vibration Impact Assessment Report indicates that the noise loggers L2 and L3, for background noise monitoring (unattended), are located within the school grounds. The Noise Policy for Industry (NPI) outlines that noise data loggers should be placed at the most affected (or potentially most affected) residence or at locations with a similar acoustical environment, for long-term noise monitoring. The locations L2 and L3 do not comply with the requirements of NPI in this regard. The Department considers that the noise data loggers should be relocated to be near the most affected residential and commercial receivers, and additional background noise monitoring undertaken.	Noise monitors located at L2 and L3 and RBLs (Rating Background Noise Levels) developed from these were not used for the project specific noise levels established in accordance with the Industrial Noise Policy. RBLs developed for noise monitor at L1 (located on the north site close to the residences) were used for the project specific noise levels. It should be noted that the acoustic and noise assessment was based on the policy at the time of assessment which was the "Industrial Noise Policy", not the "Noise Policy for Industry". An amended noise / acoustic assessment has been prepared and is included in Appendix D. The main changes included the updates to the logger information, additional logger readings and consideration of noise from proposed air conditioning units.
1p	The Landscape Masterplan at Appendix G of the EIS shows the location of 'informal yarning circles for outdoor learning' located along the eastern façade of the new school hall. These informal outdoor learning areas should be relocated to the western side to minimise potential noise impacts on the adjoining residences along Franklin Street.	The yarning circles were specifically located in this area and were proposed only to be used in a limited manner by teachers and small groups of students in a completely supervised manner. There is no direct access from the classrooms and the number of circles has been reduced from three (3) to two (2) to limit the use and number of children. These areas are not proposed to be part of the open play space so the noise will be limited and less than existing. This is an improvement on the current situation where the playground directly adjoins the neighbours' boundaries. Amended Landscape Plans have been prepared relating to the yarning circles and are included in Appendix J.
1q	The Department notes that the site is identified to be located within the Archaeological Management Unit (AMU) 3094. The submitted Statement of Heritage Impact does not identify this and does not include any assessment of archaeological significance. The Department requires that a historical archaeological assessment of the site be prepared accordance with the requirements specified in the comments from the Heritage Division of OEH, attached to this letter.	A Historical Archaeological Assessment (HAA) has been prepared and is included as Appendix F. The assessment found that the site is located within AMU 3094 and considered the potential for impacts on this area. The site was previously part of a police paddock used for grazing horses and cattle and was reserved for a school in 1934. It has generally remained clear since the 1790s and has been subject to various levels of disturbance and was subject to cut and fill in the 1960s. The area was found to be of low archaeological and research potential and the proposed development will not impact on any heritage items or

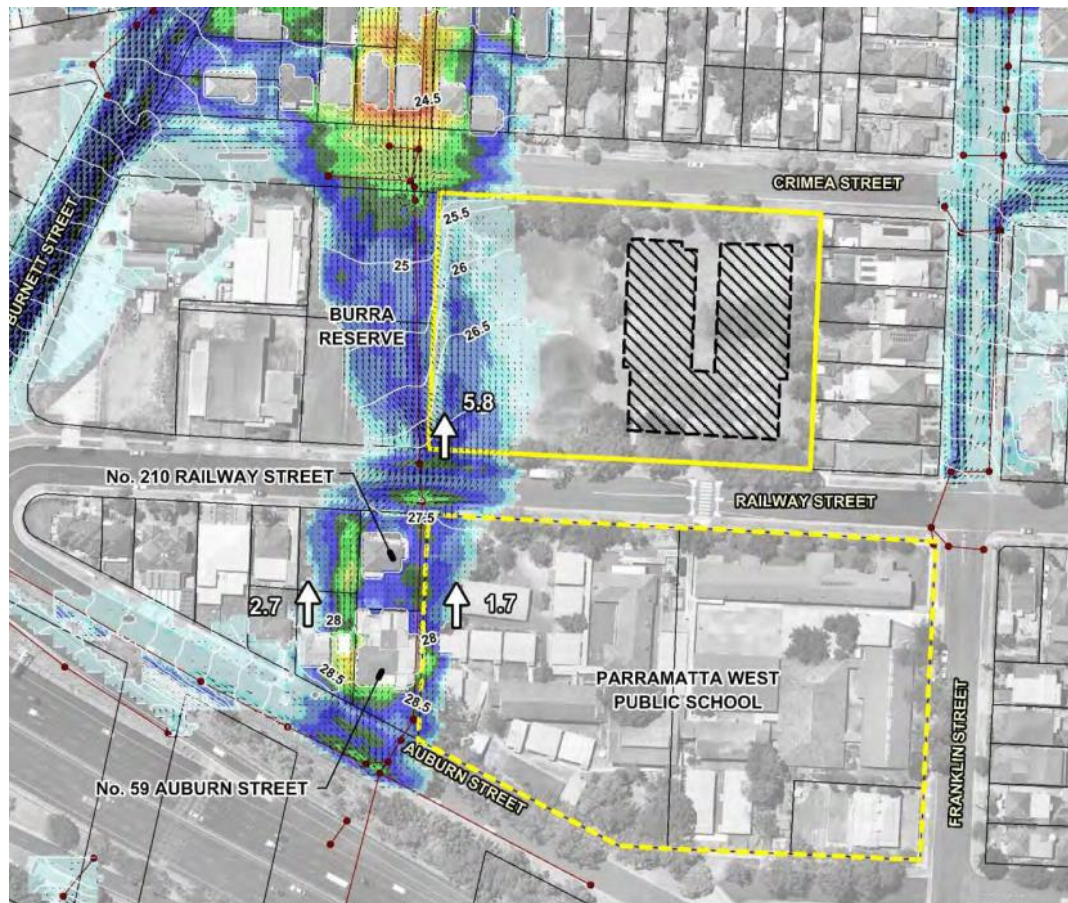
No	Submission Detail	Response
		archaeological relics. The HAA included the following recommendations: <i>If changes are made to the proposed redevelopment or remediation action plan that may result in greater impacts than described here, then further historical archaeological assessment may be required.</i> <i>The proposed redevelopment and remediation action plan can proceed with caution and without further historical archaeological assessment.</i> <i>Unexpected historical archaeological relics remain protected under the Heritage Act 1977. If any archaeological relics or features are uncovered during the course of the redevelopment or remediation, work in the vicinity of the relic or feature must cease and the Heritage Division (Office of Environment and Heritage) must be notified.</i> <i>If suspected human remains are discovered and/or harmed in, on or under the land within the study area, the following actions must be undertaken:</i> <i>The remains must not be harmed/further harmed.</i> <i>Immediately cease all works at that particular location</i> <i>Secure the area so as to avoid further harm to the remains.</i> <i>Notify the NSW Police and the Environment Line (OEH) on 131 555 as soon as practicable and provide any details of the remains and their location.</i> <i>Do not recommence any work at the particular location unless authorised in writing by OEH.</i> The proposed development can therefore occur as proposed subject to the above recommendations which will be implemented as required for the duration of construction works.
1r	The proposed new school building on the northern site will result in loss of available outdoor play area for the school students and the members of the community that share the facility with the school. The submitted Social Impact Assessment Report (SIA) does not assess any negative impact on the school users or the community	An amended SIA has been prepared to assess the impacts of the proposed modifications to existing play space on the north site (see Appendix G). The revised SIA concluded the proposal would not have any unreasonable impact on outdoor play areas on-site,

No	Submission Detail	Response
	due to the reduction of the open space availability within the site and in the locality.	or the availability of open space in the locality for the following reasons: • Whilst the Draft City of Parramatta Social Infrastructure Strategy identifies local sporting fields (Jones Park (250m from School) and Ollie Webb Reserve (600m from School)) are at capacity, the existing playground on the north site does not support any formal sporting activities (i.e. organised team sports) and is currently used as an informal play space for students; • Formal physical education requirements for students are currently pursued off-site under current operating conditions and the proposal would not increase the frequency of the school's use of Jones Park or Ollie Webb Reserve for athletics carnivals or organised sport; and • Open space and school buildings would remain available for community use as per the current arrangements, which requires the lodgement of a formal request to use these spaces. It should be noted that Figure 5 includes the location of the above Jones Park and Ollie Webb Reserves and they are both within a short walking distance of the school (as shown above and in Figure 5 below). It would be reasonable to assume that the school would continue to use these open spaces for formal sporting activities as per the existing approval. Additional analysis of the open space available on-site also demonstrates the existing play space is approximately 13,800 m², which is predominantly located on the north site which currently has no school buildings. Following the development of the north site and the removal of the demountable buildings on the south site, the proposed play space equates to 11,000 m² over both sites. Whilst this represents an overall reduction in play space across the site, the proposal would still exceed the minimum play space requirements outlined in the NSW Department of Education's Educational Facilities Standards and Guidelines (EFSG), being 10m²/student required and 11.4m² /student proposed.
1s	The Department considers that the reduction of available outdoor play area within the site may result in pressure on the adjoining	The school is not seeking to use the adjacent reserve (Burra Reserve).

No	Submission Detail	Response
	Council owned reserve due its increased use by the students and the community. In this regard no details have been provided to demonstrate whether any agreement is in place with City of Parramatta Council (Council) or is likely to be in place with Council to manage this increased use.	As stated above, the play area currently provided on the north site is not used for formal sporting activities (i.e. organised or team sports), and formal physical education requirements for students are currently provided off-site. Further, the revised SIA confirms the proposal would not increase the frequency of the school's use of Jones Park or Ollie Webb Reserve for athletics carnivals or organised sport. In addition, community use of these facilities can be agreed and must be pre-approved by the school. The school does not seek to alter the arrangements for permitting this community use.
1t	The SIA must be amended to include additional assessment of any social impact on the community and the students due to the loss of the available outdoor play area and must propose mitigation measures to address this impact.	As stated above, the SIA has been amended and is included in Appendix G. It concludes that the potential for impacts on Council open space will be limited through a number of mitigation measures which include the following: • Open space will continue to be provided on the south site following the future removal of demountable classrooms. • Use of staggered recess and lunch times during construction due to the temporary reduction in open space. • Opportunities for student physical activity will still remain for students, as the western portion of the north site play space will be retained in addition to the existing open space areas within the south site. • No change, post construction, to the current arrangements with Council for the use of the nearby Jones Park by the school for formal sporting activities on a Friday. • The school will still have a policy that permits the use of their open space areas by the community on a request basis. • There is no intention to increase the use of local or regional open space areas by the school. These measures will be adopted by the school during the construction and operational phases of the development.
1u	The submitted site plan and aerial photographs identify a car parking area on the southern section of the site. This does not represent the current scenario where demountable buildings occupy the former staff car-parking area. The Department	An amended site plan with aerial photograph has been prepared and is included in Appendix H. Figure 3 (and the plans in Appendix H) identifies the demountable classrooms that are to be removed following the occupation of

No	Submission Detail	Response
	requires that amended plans be submitted to include accurate details of the proposed layout of the site. An aerial photograph should be provided identifying all existing demountable buildings that are proposed to be removed (under separate complying development applications).	the new buildings on the north site. A combination of play space and car park (14 spaces) will be re-established on the site following the removal of the demountables. It should be noted that the catchment for Parramatta West Public school has changed – refer to extract of plan included in Figure 6 below. This will have flow on effects and potentially reduce the increase in numbers of students attending the school.
1v	The EIS does not include details of specific mitigation and management measures that would be implemented to protect the amenity of the students during construction works within the existing school on the southern site.	A preliminary Site / Construction management plan has been prepared to identify the mitigation measures that will be implemented to maintain student amenity during construction works. The preliminary plan recommends the use of the following mitigation measures: • Diversion of pedestrians by traffic controllers with appropriate fencing and hoarding; • Heavy deliveries should occur outside of peak school traffic hours; and • Location of the main access point for construction will be from Crimea Street to reduce the potential for conflicts. Construction works can be managed in accordance with the relevant EPA guidelines to ensure potential noise and dust impacts are managed appropriately. Further, play times will be staggered during construction works to ensure sufficient play space is available. Mitigation strategies will be confirmed following SSDA approval, with regard to the conditions of development consent and with input from the Head Contractor.

Figure 1: Tuflow Model Results from PMF (Source: Lyall & Associates)

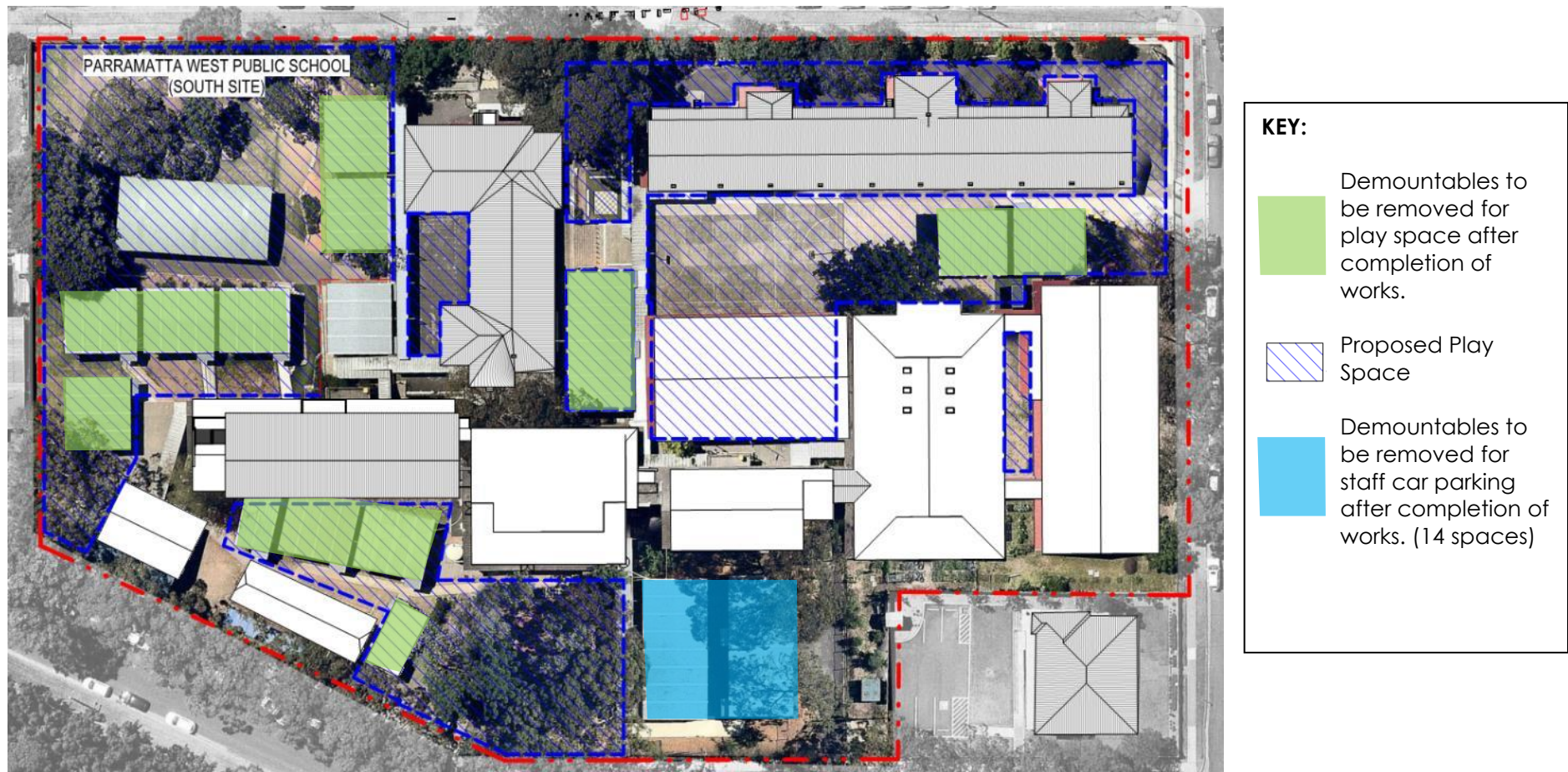


Reference Point 1d

Figure 2: Sketch showing connectivity and advantages of proposed building location (Source: Conrad Gargett)



Reference Point 1d and 1e

Figure 3: Annotated extract of proposed play space plan – South Site

Reference Point 1u,

Figure 4: Extract of Proposed parking and drop-off and pick-up zones from Traffic Assessment by ARUP (Figure 30)



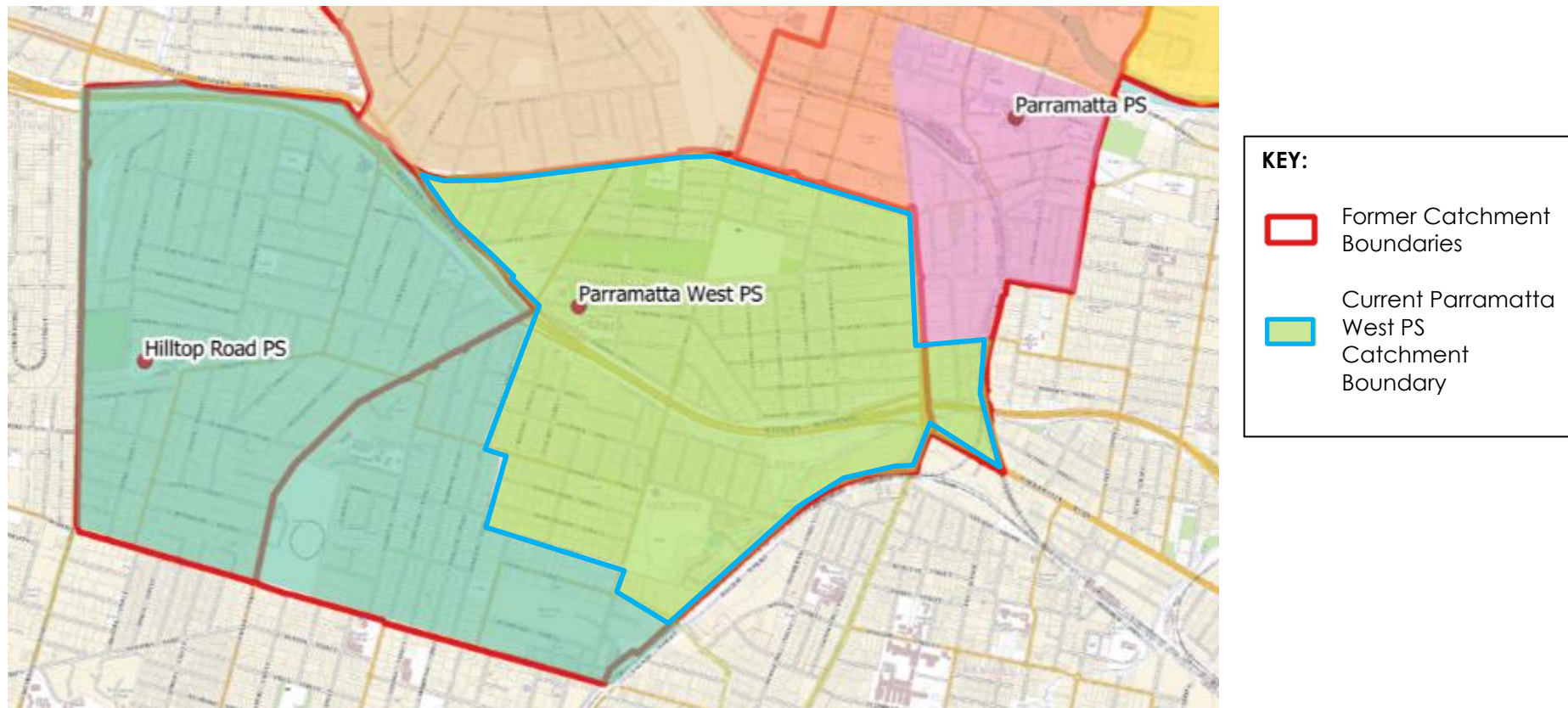
Reference Point 1g

Figure 5: Location of nearby open space in relation to Parramatta West Public School



Reference Point 1r

Figure 6: Extract of School Catchment Plan showing changes (Source: DoE)



Reference Point 1u

3.2 Environment Protection Authority (EPA)

Table 2: Submissions from EPA

No	Submission Detail	Response
2a	The EPA notes that the development site straddles Railway Street and the new structure, including the school hall, located on part of the existing sports fields on the northern side of Railway Street. The EPA further notes that the new structure is proposed approximately 10 metres from the rear boundary of Franklin Street residences and provides some acoustic shielding of residences from activities (including community use) on the sports field located between that structure and Burra Reserve.	Noted.
	The EPA has identified the following site specific concerns based on the project information available on the Department of Planning and Environment major projects web site:	
2b	(a) The need for a detailed assessment of potential site contamination, including information about groundwater and a detailed assessment of the footprint and surrounds of existing buildings following their demolition.	A detailed site assessment report was included as Appendix Q of the EIS and SSD application. This assessment included potential site contamination including limited ground water for the north site. Additional advice has been provided by the contamination consultants to assist with this report. The reporting did not include the existing buildings on the south site as the scope is limited to internal above ground reconfiguration and alterations. Based on the school's asbestos register (Appendix M), it is not anticipated that any existing risks on the site will be increased by the works associated with the existing buildings.
2c	(b) Construction phase noise and vibration impacts (including recommended standard construction hours and intra-day respite periods for highly intrusive noise generating work) on noise sensitive receivers such as surrounding residences.	Details have been included in the noise and vibration assessment undertaken for the EIS. The recommendations included: • Provision of a 2.4m high sound wall along north and east boundaries. • Restrict out of hours noise on Saturdays to ensure noise levels are met. • Plant equipment should be effectively screened if required to operate at night time.

No	Submission Detail	Response
		Consider alternatives to the traditional beeper reversing alarm for vehicles that are not as obtrusive. They will be included in the site / construction management plan to be prepared by the Head Contractor.
2d	(c) Construction phase dust control and management.	The final site / construction management plan and other supporting documentation are currently being developed by the Head Contractor in consultation with DoE and other relevant stakeholders. The preliminary plan provided with the EIS included the following recommendations: - Install and maintain erosion and sediment control fencing in appropriate locations and for stockpiles; - Temporary sediment basin for surface flows; - Cover or wet exposed soil to reduce dust; - Install and maintain mesh and gravel filters to downstream stormwater pits; - Site hoarding and security fencing; and - Stabilised site access.
2e	(d) Construction phase erosion and sediment control and management.	The final site / construction management plan and other supporting documentation are currently being developed by the Head Contractor in consultation with DoE and other relevant stakeholders. The preliminary plan provided with the EIS included the following recommendations: - Install and maintain erosion and sediment control fencing in appropriate locations and for stockpiles; - Temporary sediment basin for surface flows; - Cover or wet exposed soil to reduce dust; - Install and maintain mesh and gravel filters to downstream stormwater pits; - Site hoarding and security fencing; and - Stabilised site access.
2f	(e) Operational noise impacts on noise sensitive receivers (especially surrounding residences on adjoining and	The updated Acoustic Report addresses all noted operational noise impacts. It is included in Appendix D and contains acoustic

No	Submission Detail	Response
	adjacent holdings) arising from operational activities such as public address/school bell systems, community use of school facilities, waste collection services and mechanical services (especially air conditioning plant).	treatment specified to the external mechanical equipment, namely the external condenser units. The acoustic treatment has been provided to meet the relevant external noise limits. Refer to Section 5.5.1 of the updated acoustic report. Noise mitigation measures are required to achieve compliance with guidelines for mechanical related noise which include acoustic screening of between 2.2 and 2.5m high. Where louvres are required for ventilation, they shall be equal to at least the insertion loss of the ACRAN 100 and 400 series (where indicated). Where a solid barrier is required, it shall be constructed from a material with a surface density at least 25kg/m² such as 15mm compressed fibre cement sheeting.
2g	(f) The need to assess feasible and reasonable noise mitigation and management measures (including time restrictions on the use of the facilities proposed to be available for community use) to minimise operational noise impacts on surrounding residences.	Section 5 of the updated acoustic report (Appendix D) presents the operational noise assessment providing predicted noise levels and proposes operational restrictions on the use of the Hall and community use as well as recommended management protocols. The proposed measures and restrictions include the following: • The hall should not be operated beyond 10pm (earlier for concerts – see below). • No use of amplified music under communal operation. • Concerts should be restricted to daytime and should conclude by no later than 6.00pm. • Under concert operation the hall must be fully closed and noise level controlled to ensure compliance. • The façade of the hall should be designed based on the glazing and construction included in the report, this would be relevant for the detailed design phase. • Ensure occupants / users enter and leave the premises quietly.
2h	(g) Practical opportunities to implement water sensitive urban design principles, including stormwater re-use.	Water Sensitive Urban Design (WSUD) opportunities were considered in Section 4 of the stormwater report, and plan, prepared by Adams Consulting Engineers and included in the original EIS. They included: • Use of water efficient fixtures and fittings; • Water monitoring systems to identify leaks; and • Rainwater collection and reuse with two x 5kL reuse tanks.

No	Submission Detail	Response
		Refer also to Section 3.2 of the Ecologically Sustainable Development (ESD) Report prepared by Wood and Grieve Engineers. No further changes are proposed.
2i	(h) Practical opportunities to minimise consumption of energy generated from non-renewable sources and to implement effective energy efficiency measures.	Energy efficiency measures have been included in the original design and information. The proposed energy efficient measures proposed in the ESD report included with the original EIS, include: • Use of on-site Renewable Energy (Photovoltaic solar system); • Efficient lighting such as LEDs; • Daylight and motion sensors for lighting; • Skylights; • Shading devices (vertical fins); • Energy and water efficient appliances; • Use of thermally efficient construction; and • Operable windows and natural ventilation (where acoustics allow). Refer to Section 3.1 of the Ecologically Sustainable Development Report prepared by Wood and Grieve Engineers. No further changes are proposed.
2j	The EPA notes the proximity of surrounding residences which may be adversely affected by noise impacts during demolition, site preparation, construction and operation phases of the project.	A Construction Noise and Vibration Management Plan was included in Section 7 of the Acoustic Report which provides the noise impact to surrounding residential, church and school receivers for all stages and phases of demolition to construction. Acoustic mitigation measures, reasonable and feasible measures, complaints handling procedures etc. have been included. Noise maps have been provided in Appendix 3 of the report. Refer to Appendix D for amended noise / acoustic assessment. Details will be included in the final site / construction management plan and other supporting documentation which are currently being developed by the Head Contractor in consultation with DoE and other relevant stakeholders.

No	Submission Detail	Response
		To provide an idea of some of the mitigation and management measures proposed to ensure compliance with noise levels, the following will be employed during construction: • Construction of a 2.4m high sound wall along north and east boundaries. • Restrict out of the prescribed construction hours noise on Saturdays to ensure noise levels are met. • Plant equipment should be effectively screened if required to operate at night. • Consider less obtrusive alternatives to the traditional beeper reversing alarm for vehicles.
2k	The EPA anticipates that site establishment, demolition, bulk earthworks, construction and construction-related activities will be undertaken in an environmentally responsible manner with particular emphasis on – • the site contamination remediation action plan accompanying the EIS, • compliance with recommended standard construction hours, • intra-day respite periods from high noise generating construction activities (including jack hammering, rock breaking, pile boring or driving, saw cutting), • feasible and reasonable noise and vibration minimisation and mitigation, • effective dust control and management, • erosion and sediment control, and • waste handling and management, particularly concrete waste and rinse water.	Details will be included in the final site / construction management plan and other supporting documentation which are currently being developed by the Head Contractor in consultation with DoE and other relevant stakeholders.
2l	The development site is comprised of a northern and southern campus divided by Railway Street. However, the EPA notes that 'the site' defined in Figure 1 to EIS Appendix Q only refers to that part of the development site located on the northern side (existing sports fields) of Railway Street despite proposed development on that part of the development site located on the southern side (existing complex of buildings) of Railway Street.	Noted. The main development where ground penetration is proposed is located on the north site. The works on the south site are mainly internal and are to existing buildings. The contamination assessment therefore focused on the northern area. The reporting did not include the existing buildings on the south site as the scope is limited to internal above ground reconfiguration and alterations. It is not anticipated that any

No	Submission Detail	Response
		existing risks on the site will be increased by the works associated with the existing buildings
2m	Section 10 to EIS Appendix Q 'Detailed Site Investigation' concludes that "... remediation is required to address risks associated with carcinogenic PAHs at one location (TP32) and asbestos (as bonded ACM) in fill across the entire site.". The EPA anticipates that given the age of some of the structures on the southern campus, asbestos containing materials and lead-based paints are likely to be encountered during demolition and redevelopment on that side of the development site. However, the EIS does not appear to include a hazardous materials survey of the southern campus.	An asbestos register is available for the south site and is included in Appendix M. In addition to asbestos, any other hazardous materials will be managed in accordance with the current legislative requirements during construction by the Head Contractor. Details will be included in the site / construction management plan to be prepared by the Head Contractor which will require a formal hazardous materials survey prior to construction works commencing on the south site.
2n	The EIS Appendix Q does not – (i) include evidence that the surface/exposed material suspected of containing asbestos was tested to confirm the presence of asbestos. (ii) confirm whether suspected asbestos containing material removed from the development site was disposed on at a landfill legally able to accept that waste. (iii) fully delineate the extent of some contaminants. (iv) include an adequate groundwater assessment. (v) clearly indicate where the asbestos samples were collected. (vi) clearly indicate if the soil contamination was vertically delineated. (vii) indicate that a groundwater sampling well down hydraulic gradient of the 'the site' to determine whether suspected groundwater contamination was migrating off the site.	The contamination consultant provided the following responses to the concerns raised about the assessment included in Appendix Q of the EIS. (i) There were 14 soil samples analysed for asbestos from the surficial fill profiles. Additionally, 13 samples of fibre cement collected from these fill profiles were also analysed for asbestos. This is clearly documented throughout the report and results are presented in Tables A and F of the DSI. (ii) Section 2.5.5 of the DSI confirms that fragments collected during the inspection were disposed of appropriately. Fragments collected in the field were returned to our office for temporary storage, then disposed of as part of a larger consignment (see waste docket attached in Appendix L of this report). (iii) It is unclear which contaminants this comment is referring to and whether this relates to horizontal or vertical delineation. We assume this refers to vertical delineation and our response to this is included in Point 2o below. The report notes that the contamination is associated with imported fill which is obviously limited in vertical extent and this has been confirmed at most locations across the site. (iv) There were no sources of groundwater contamination identified via the site history, so the groundwater investigation included a limited screening only. Risks from groundwater

No	Submission Detail	Response
		were assessed to be low (which supported the initial Conceptual Site Model) and no further groundwater investigation was recommended. (v) The bulk asbestos screening (field screening) was undertaken on each distinct fill profile or at least every 1m as described in the sampling plan/method (Section 6.2 of DSI). All field screening samples are listed in Table F of DSI and these are also shown on the logs (as disturbed bulk 'DB' samples) in Appendix B of DSI. 500ml soil analysis is also in Table F of DSI and is clearly labelled for each location and depth, all of which corresponds to the figures included with the DSI report. Fibre cement fragments found in bulk field screening samples are recorded on the respective log in Appendix B of the DSI, the labels of which correlate to the fragment analysis summary in Table A of DSI. (vi) The report does not include specific commentary regarding 'vertical delineation', however we are of the opinion that the vertical delineation of contamination was adequate considering the contaminants encountered. See further commentary in response to Point 2o below. (vii) There was no down gradient well. It is noted that there was no contamination found on-site that was deemed to pose a migration risk to groundwater. On this basis, groundwater at the down-gradient site boundary is expected to be similar to that at the up-gradient boundary as assessed in MW40.
2o	Appendix Q of the EIS did not vertically delineate the extent of contamination in the following locations: - TP15 asbestos in soil exceeding criteria at 0.1 to 1 m depth (no deeper samples tested). It is noted the Detailed site investigation indicated deepest fill (of >1.0 m, not defined how deep) was encountered on the western section of the investigation area; and - TP30, total recoverable hydrocarbons in the >C16-C34 (F3) range exceeding criteria at 0.3 m depth (no deeper samples tested).	The target depth of the DSI at the test pit locations was 1m as requested by the client. Fill is deeper in the west of the site due to the sewer. Further characterisation for asbestos is not considered necessary in light of the proposed management approach which will require development and implementation of an Environmental Management Plan (EMP). There is no TRH (F3) exceedance at TP30. The EPA may be referring to the TRH (F3) concentration of 1,500mg/kg in TP32 (0-0.2m), we note that the underlying sample (TP32 0.7-0.9m) was also analysed at the TP32 location and did not contain detectable TRH (F3). Therefore, vertical delineation was adequate.

No	Submission Detail	Response
2p	Appendix Q applies a 95% upper confidence limit (UCL) to screening results against NEPM Health Investigation Level -A (HIL-A) guidelines. For instance, a 95% UCL value of 8.8 mg/kg carcinogenic PAH was calculated and applied for screening purposes. The EPA notes that – (a) the standard NEPM HIL-A values for carcinogenic PAHs is 3 mg/kg concentration, (b) of 30 samples tested, six carcinogenic PAH values were reported above detection levels and the remaining 24 were reported at concentrations of less than laboratory limits of reporting, so the calculation appears to have been made by transforming the less than LOR values to 0. Accordingly, the EPA considers that the screening value of 8.8 mg/kg appears to be appropriate in this case.	Noted.
2q	EIS Appendix CC '<i>Remediation Action Plan</i>' proposes capping and containment of asbestos contaminated soils with a 300 millimetres cap of clean fill over the marker layer. However, the Western Australian DoH '<i>Guidelines for the Assessment, Remediation and Management of Asbestos- Contaminated Sites in Western Australia – May 2009</i>' recommends the depth of the clean fill should be at least 1 m for public open spaces and at least 0.5 m for all other uses, such as residential or commercial activities.	Western Australian (WA) DoH 2009 Guidelines indicates that the implementation of additional measures such as marker layers, on-going management plans, and appropriate notification and enforcement mechanisms can be used to support a proposal for reduced capping thicknesses. The potential for generating respirable, airborne asbestos fibres from soils containing bonded Asbestos Containing Material (ACM) is low, even during soil disturbance (this was supported by the air monitoring results during the DSI – see Section 8.3 of the report).
2r	The EPA considers the emplacement of only 300 millimetres of clean material over the marker layer and no cap under hardstand areas poses a potential risk to future users.	Notwithstanding this and based on the EPAs comments, the Department of Education engaged an EPA Accredited Site Auditor (Michael Dunbavan from Coffey) who undertook an assessment of the proposed depth of capping over contaminated fill on the north site. The interim advice from the site auditor is included in Appendix N and recommends: • No placement of additional fill material or marker layer, and • Review of the School's current Asbestos Management Plan to ensure regular (at least annual) site inspections by a person competent to identify Bonded ACM in surface soil with removal of any visible Bonded ACM fragments is included as a risk management measure.

No	Submission Detail	Response
		It should be noted that the Auditor's recommendations are made with reference to: • Guidelines for the Assessment, Remediation and Management of Asbestos-Contaminated Sites in Western Australia (May 2009); • National Environment Protection (Assessment of Site Contamination) Measure (NEPM) 1999 – Schedule B1; and • National Environment Protection (Assessment of Site Contamination) Measure April 2011.
2s	EIS Appendix CC proposes the excavation and removal of PAH contaminated soil but omits any remediation of other hotspots of contamination (e.g. Pb and TRH).	The extent of remediation was based on the outcome of the Tier 1 risk assessment presented in Section 9.1 of the DSI, which addressed risks associated with all contaminants of potential concern.
2t	The EPA having regard to foregoing and the sensitive nature of the proposed use, considers that the proponent should engage an accredited site auditor. The proponent should note that the EPA requires all contamination assessment and validation reports submitted to the EPA to comply with the requirements of the <i>Contaminated Land Management Act 1997</i> and to be prepared, or reviewed and approved, by a certified consultant. The proponent be required to engage a site auditor (accredited under the Contaminated Land Management Act 1997) to: (a) review the adequacy of contamination assessment reports, any remediation action plan and unexpected finds procedure, and (b) provide a Section A Site Audit Statement (SAS) and accompanying Site Audit Report (SAR) certifying the suitability of the development site for the proposed use.	Noted and accepted.
2u	That the proponent be required to implement the recommendations of the Remedial Action Plan as conditioned by the accredited site auditor.	Noted and accepted.
2v	The proponent be required to ensure: (a) further details of the proposed remediation and validation strategy are provided to the site auditor in a Works Plan and a	Noted and accepted.

No	Submission Detail	Response
	Validation Sampling and Analysis Quality Plan (VSAQP) for review by the site auditor prior to remediation commencing; (b) an Asbestos Works Management Plan (AWMP), including stringent controls on dust emissions, is prepared and submitted to the site auditor for review; and (c) a long term Environmental Management Plan (LTEMP) is prepared following remediation of the development site to document - (i) the expected limitations on the development site use, (ii) relevant environmental and health and safety processes and procedures, (iii) management processes, procedures and responsibilities to be adopted by future site users within the development site, and (iv) details on the location and extent of placed or residual asbestos contaminated fill materials, capping layers and marker barriers within the development site.	
2w	The proponent be required, prior to commencing work (on that part of the school campus on the southern side of Railway Street), to undertake a hazardous material survey and to prepare and implement an appropriate procedure for identifying and dealing with unexpected finds of site contamination, including – (i) asbestos containing materials, and (ii) lead-based paint.	Noted and accepted.
2x	The proponent be required to satisfy the requirements of the Protection of the Environment Operations (Waste) Regulation 2014 with particular reference to Part 7 'asbestos wastes'.	Noted and accepted.
2y	The proponent be required to consult with Safework NSW concerning the handling of any asbestos waste that may be encountered during the course of the project.	Noted and accepted.
2z	The proponent be required consider the guidance material provided in <i>The National Environment Protection (Assessment of Site Contamination) Measure</i> as well as the following EPA documents when undertaking further site assessment and validation -	Noted and accepted.

No	Submission Detail	Response
	- Technical Note: Investigation of Service Station Sites, 2014, - NSW EPA Sampling Design Guidelines, - Guidelines for the NSW Site Auditor Scheme (3rd edition) 2017, and - Guidelines for Consultants Reporting on Contaminated Sites, 2011.	
2aa	The proponent be required to ensure that the processes outlined in <i>State Environmental Planning Policy 55 - Remediation of Land (SEPP55)</i> are followed in assessing the suitability of the land and any remediation required in relation to the proposed use.	Noted and accepted.
2ab	The proponent be required to ensure that the proposed development does not result in a change of risk in relation to any pre-existing contamination on the site so as to result in significant contamination.	Noted and accepted.
2ac	The proponent be required to notify the EPA should any contamination of the development site be identified which meets the triggers in the <i>Guidelines for the Duty to Report Contamination</i> .	Noted and accepted.
2ad	The EPA anticipates that demolition, site preparation (including tree clearing), bulk earthworks, construction and construction-related activities are likely to have significant noise and vibration impacts on surrounding residences, especially adjoining residences in Franklin Street. The EPA emphasises that demolition, site preparation, bulk earthworks, construction and construction related activities should be undertaken during the recommended standard construction hours.	Noted and accepted. Details will be included in the final site / construction management plan and other supporting documentation which are currently being developed by the Head Contractor in consultation with DoE and other relevant stakeholders.
2ae	Table 1 to the EPA's Interim Construction Noise Guideline clearly identifies the best practicable measures in respect of the recommended standard hours of construction (in the absence of strong justification for alternative hours in the particular case). Section 4.4 to EIS Appendix U proposes Saturday construction hours from 8.00 am to 5.00 pm instead of the standard recommended hours of 8.00 am to 1.00 pm. The proponent does	Noted and accepted. The proposed construction hours will be in accordance with EPA's recommendations. Details will be included in the final site / construction management plan and other supporting documentation which are currently being developed by the Head Contractor in consultation with DoE and other relevant stakeholders.

No	Submission Detail	Response
	not provide strong justification for construction outside the standard hours on Saturdays.	
2af	The proponent be required to ensure that as far as practicable all demolition, site preparation, bulk earthworks, construction and construction-related activities likely to be audible at any noise sensitive receivers such as surrounding residences are only undertaken during the standard construction hours, being - (a) 7.00 am to 6.00 pm Monday to Friday, (b) 8.00 am to 1.00 pm Saturday, and (c) no work on Sundays or gazetted public holidays.	Noted and accepted.
2ag	The EPA anticipates that those demolition, site preparation, bulk earthworks, construction and construction-related activities generating noise with particularly annoying or intrusive characteristics (such as those identified as particularly annoying in section 4.5 of the Interim Construction Noise Guideline) would be subject to a regime of intra-day respite periods where – (a) they are only undertaken after 8.00 am, (b) they are only undertaken over continuous periods not exceeding 3 hours with at least a 1 hour respite every three hours, and (c) 'continuous' means any period during which there is less than an uninterrupted 60 minute respite between temporarily halting and recommencing any of the intrusive and annoying work referred to in Interim Construction Noise Guideline section 4.5.	Noted and accepted.
2ah	The EPA emphasises that intra-day respite periods are not proposed to apply to those demolition, site preparation, bulk earthworks, construction and construction-related activities that do not generate noise with particularly annoying or intrusive characteristics.	Noted and accepted.
2ai	The proponent be required to schedule intra-day 'respite periods' for construction activities identified in section 4.5 of the Interim Construction Noise Guideline as being particularly annoying to noise sensitive receivers, including surrounding residents.	Noted and accepted.

No	Submission Detail	Response
2aj	The EPA is aware from previous major infrastructure projects that community concerns are likely to arise from noise impacts associated with the early arrival and idling of construction vehicles (including concrete agitator trucks) at the development site and in the residential precincts surrounding that site. The proponent be required to ensure construction vehicles (including concrete agitator trucks) involved in demolition, site preparation, bulk earthworks, construction and construction-related activities do not arrive at the project site or in surrounding residential precincts outside approved construction hours.	Noted and accepted.
2ak	The EPA has identified the noise from 'beeper' type plant movement alarms to be particularly intrusive and is aware of feasible and reasonable alternatives. Transport for NSW, Barangaroo Delivery Authority/Lend Lease and Leighton Contractors have undertaken safety risk assessments of alternatives to the traditional 'beeper' alarms. Each determined that adoption of 'quacker' type movement/reversing alarms instead of traditional beepers on all plant and vehicles would not only maintain a safe workplace but also deliver improved outcomes of reduced noise impacts on surrounding residents. Interim Construction Noise Guideline Appendix C provides additional background material on this issue.	Noted and accepted.
2al	The proponent be required to consider undertaking a safety risk assessment of site preparation, bulk earth works, construction and construction-related activities to determine whether it is practicable to use audible movement alarms of a type that would minimise the noise impact on surrounding noise sensitive receivers, without compromising safety.	Noted and accepted.
2am	The EPA considers dust control and management to be an important air quality issue during demolition, site preparation, bulk earthworks and subsequent construction. The proponent be required to minimise dust emissions on the site and prevent dust emissions from the site.	Noted and accepted.
2an	<i>Managing Urban Stormwater Soils and Construction, 4th Edition</i> published by Landcom (the so-called 'Blue Book') provides guidance material for achieving effective sediment control on	Noted and accepted.

No	Submission Detail	Response
	construction sites. The proponent should implement all such feasible and reasonable measures as may be necessary to prevent water pollution in the course of developing the site. The EPA emphasises the importance of – (a) not commencing demolition, site preparation, bulk earthworks, construction and construction related activities until appropriate and effective sediment controls are in place, and (b) daily inspection of sediment controls which is fundamental to ensuring timely maintenance and repair of those controls.	
2ao	The proponent should manage waste in accordance with the waste management hierarchy. The waste hierarchy, established under the Waste Avoidance and Resource Recovery Act 2001, is one that ensures that resource management options are considered against the following priorities: Avoidance including action to reduce the amount of waste generated by households, industry and all levels of government Resource recovery including reuse, recycling, reprocessing and energy recovery, consistent with the most efficient use of the recovered resources Disposal including management of all disposal options in the most environmentally responsible manner. All wastes generated during the project must be properly assessed, classified and managed in accordance with the EPA's guidelines to ensure proper treatment, transport and disposal at a landfill legally able to accept those wastes. The EPA further anticipates that, without proper site controls and management, mud and waste may be tracked off the site during the course of the project.	Noted and accepted.
2ap	The proponent be required to ensure that: (1) all waste generated during the project is assessed, classified and managed in accordance with the EPA "Waste Classification Guidelines Part 1: Classifying Waste", November 2014 and the 2016 Addendum thereto;	Noted and accepted.

No	Submission Detail	Response
	(2) the body of any vehicle or trailer, used to transport waste or excavation spoil from the premises, is covered before leaving the premises to prevent any spill or escape of any dust, waste, or spoil from the vehicle or trailer; and (3) mud, splatter, dust and other material likely to fall from or be cast off the wheels, underside or body of any vehicle, trailer or motorised plant leaving the site, is removed before the vehicle, trailer or motorised plant leaves the premises.	
2aq	The EPA anticipates that during the course of the project concrete deliveries and pumping are likely to generate significant volumes of concrete waste and rinse water. The proponent should ensure that concrete waste and rinse water is not disposed of on the project site and instead that – (a) waste concrete is either returned in the agitator trucks to the supplier or directed to a dedicated watertight skip protected from the entry of precipitation, and (b) concrete rinse water is directed to a dedicated watertight skip protected from the entry of precipitation or a suitable water treatment plant. The proponent be required to ensure that concrete waste and rinse water are not disposed of on the development site, and prevented from entering waters, including any natural or artificial watercourse.	Noted and accepted.
2ar	The EPA considers that environmental impacts that arise once the development is operational should be able to be largely averted by responsible environmental management practices, particularly with regard to: (a) feasible and reasonable noise mitigation measures; (b) waste management in accordance with the waste management hierarchy; (c) water sensitive urban design; and (d) energy conservation and efficiency.	Noted and accepted.
2as	The EPA anticipates the proposed development (especially out of hours use of school facilities by external parties) may have	Noted and accepted.

No	Submission Detail	Response
	significant operational noise impacts on nearby sensitive receivers, especially adjoining residences in Franklin Street. The EPA notes with concern the proximity of the surrounding residences and is aware from long experience of the need for appropriate operational noise mitigation and management measures, particularly in regard to: (a) the nature of and times during which school facilities are made available for community use; (b) the design and operation of the school public address/bell system; (c) the design and location of waste storage facilities; (d) time restrictions on waste collection services; (e) design, selection and operation of mechanical ventilation plant and equipment; and (f) time restrictions on grounds maintenance using powered equipment (e.g. leaf blowers, brush cutters and lawn mowers).	
2at	The EPA emphasises that properly establishing background noise levels in accordance with guidance material in the New South Wales Industrial Noise Policy (INP) is fundamental to a consistent approach to the quantitative assessment of noise impacts of development. EIS Section 3.3.1 to EIS Appendix U indicates that loggers used to undertake background noise monitoring at locations L1 and L2 were installed between 5 and 13 December 2017. The NSW INP specifies that at least a 'week's worth' of monitoring data is required to establish background noise levels and that noise levels measured during rainfall should be excluded when deriving those background levels. The Bureau of Meteorology Horsley Park and Sydney Olympic Park weather stations both recorded rainfall on 5, 7 and 9 December 2017 and EIS Section 3.3.1 to EIS Appendix U states that "... rain affected data has been excluded from calculations." The INP guidance material also specifies that –	Additional noise monitoring was conducted at position L1 in order to validate the previous data and provide at least 7 full days of monitoring. The results of the noise monitoring have been used in the report for the development of RBL values. Refer to Appendix 2 of the Acoustic Report for the data including periods which have been excluded due to rain. Project specific noise levels have been based on the results of logger L1. Monitoring at location L1 is indicative of the background noise levels to the most-affected residential receivers. These background noise levels are also the lowest in the area surrounding the school, hence the most stringent criteria was developed from this noise monitor. An amended noise / acoustic assessment has been prepared and is included in Appendix D.

No	Submission Detail	Response
	(a) background noise should be measured at the most-affected or potentially most-affected noise sensitive receiver locations (i.e. residences in Franklin Street), and (b) noise from an existing development should be excluded from background noise measurements. However, Figure 1 to EIS Appendix U – • indicates that unattended background noise monitoring locations L2 and L3 were located on the southern campus (existing complex of school buildings), • indicates that unattended background noise monitoring location L1 is located on the vacant northern campus, and • omits the location of attended noise monitoring location P1. Table 1 to EIS Appendix U appears to indicate that noise monitoring at location L3 was affected by a noise source on the southern campus.	
2au	The proponent be required to revise project assessment background levels, rating background levels and project specific noise levels based on the unattended background noise data obtained at monitoring locations L1.	Refer to response to 2at above.
2av	The proponent be required to provide day to a page graphical representation of background noise monitoring data as well as the extent of weather affected data excluded from calculation of background and project specific noise levels.	Refer to response to 2at above.
2aw	The proponent be required to review the location of the proposed buildings on the northern campus to a position further west of the adjoining Franklin Street residences.	Assessment of the area to the west of the existing site showed that this area was not appropriate for the building based on overland flow, flooding potential, and inefficiency of the connectivity to the existing school buildings. The site of the building is currently used for a play space at recess and lunch. The proposed building closest to the residences are to be used for classrooms and would reduce and block potential noise from play spaces. This is confirmed in the amended acoustic report included in Appendix D.
2ax	The EPA is aware of government policy to encourage out of hours community use of school facilities provided that use does not	Noted, Section 5 of the acoustic report presents the operational noise assessment providing predicted noise levels and proposes operational restrictions on the use of the hall and community use

No	Submission Detail	Response
	cause noise emissions that interfere unreasonably with the comfort or repose of persons not on the premises. The EPA considers that, in relation to the school hall, noise from normal school activities in class hours would not be acoustically significant. However, the use of the hall for other events, particularly outside school hours, has the potential to adversely impact on residences. The EPA considers the proposed community use of school facilities (especially the hall and sports field) outside normal school hours needs to be carefully managed to ensure noise impacts on nearby residences are minimised. Section 5.2.2 to EIS Appendix U outlines the predicted noise impacts of a concert type activity held in the school hall under certain assumed conditions and recommends that the hall not be made available for concert type activities after 6.00 pm. EIS section 10.3.5 proposes that the school hall not be used after 10.00pm and adopts the recommended 6.00pm curfew on concerts. The EPA is aware of community concern arising from the use of facilities at a number of schools for activities involving amplified music and band rehearsals.	as well as recommended management protocols. Refer to Appendix D.
2ay	The proponent be required to ensure that the school hall is not made available: (a) for community use after 10.00pm; and (b) for activities involving amplified music or band rehearsals (other than the annual school concert)– (i) after 6.00 pm Monday to Friday, and (ii) on Saturdays, Sundays and gazetted public holidays.	Noted. As recommended in reports, please refer to amended acoustic / noise report included in Appendix D.
2az	The proponent be required to undertake comprehensive noise compliance monitoring of representative uses of the school hall and sports field and associated facilities (e.g. parking) outside school hours to demonstrate that the level, nature, quality and character of noise emitted by those uses and the time at which and frequency of those uses would not interfere unreasonably with or be likely to interfere unreasonably with the comfort or repose of persons not on the development site, especially the occupants of nearby residences.	Noted – refer to amended acoustic / noise report included in Appendix D.

No	Submission Detail	Response
2ba	The proponent be required to submit a detailed noise compliance monitoring report with noise measurements reported against relevant noise criteria and the outcomes of appropriate community consultation together with detailed recommendations concerning any additional feasible and reasonable noise mitigation and management measures, including stricter or more relaxed restrictions on the times at which and the frequency of each type of use of the school hall, sports field and associated facilities (e.g. parking) outside school hours.	Noted – refer to amended acoustic / noise report included in Appendix D.
2bb	The proponent be required to ensure that noise compliance monitoring referred to in paragraph (a) above, would include quantitative noise impact assessment to address noise emissions arising from amongst other things – • audience/spectator noise, • referee whistle noise, • training sessions as well as sporting events, • any amplified sound during sporting events and any associated training sessions, and • post-event audience/spectator noise, including vehicle door slamming and departure noise.	Noted – refer to amended acoustic / noise report included in Appendix D.
2bc	Section 5.5 to EIS Appendix U indicates a worst case scenario of mechanical ventilation plant and goes on in section 5.5.1 to recommend that the proponent consider various mitigation measures "...during the design development stage ...". The proponent be required to: (a) provide a comprehensive quantitative assessment of operational noise impacts of any mechanical plant and equipment on surrounding noise sensitive receivers, especially residences in Franklin Street; and (b) ensure mechanical plant and equipment installed on the development site does not generate noise that – (i) exceeds 5 dbA above the rating background noise level (day, evening and night) measured at the eastern boundary of the development site, and (ii) exhibits tonal or other annoying characteristics.	Noted. Amendments to plan have been included in the amended acoustic / noise report included in Appendix D.

No	Submission Detail	Response
2bd	The EPA notes numerous reports of community concern arising from inadequate design and installation as well as inappropriate use of school public address and bell systems and considers that appropriate design, installation and operation of those systems can both – • meet the proponent's objectives of proper administration of the school and ensuring the safety of students, staff and visitors, and • avoid interfering unreasonably with the comfort and repose of occupants of nearby residences. The proponent be required to design, install and operate the school public address/bell system to implement all such other measures as may be necessary to ensure use of that system does not interfere unreasonably with the comfort and repose of occupants of nearby residences.	Noted – refer to amended acoustic / noise report included in Appendix D.
2be	The EPA notes numerous reports of community concern arising from waste collection services undertaken at schools and especially during evening and night times. Section 5.2.4 to EIS Appendix U proposes that waste collection services be restricted to the hours of 7.00 am to 10.00 pm. The EPA has previously directed the Department of Education to, in general, restrict undertaking waste collection services at its schools to between the hours of 7.30 am to 6.00 pm Monday to Friday. The proponent be required to ensure waste collection services are not undertaken outside the hours of 7.30 am to 6.00 pm Monday to Friday.	Noted and accepted.
2bf	The EPA notes numerous reports of community concern arising from grounds maintenance involving the use of powered equipment (example: leaf blowers, lawn mowers, brush cutters) at schools during early morning and evening periods as well as on weekends and public holidays. However, section 5.2.4 to EIS Appendix U proposes that grounds maintenance only occur during standard school hours (i.e. 7.00 am to 6.00 pm). The EPA has previously directed the Department of Education to restrict undertaking grounds maintenance using powered	Noted and accepted.

No	Submission Detail	Response
	equipment to between the hours of 7.30 am to 6.00 pm Monday to Friday. The proponent be required to ensure grounds maintenance involving the use of powered equipment is not undertaken outside the hours of 7.30 am to 6.00 pm Monday to Friday.	
2bg	The proponent should manage waste in accordance with the waste management hierarchy mentioned earlier. The proponent be required to identify and implement feasible and reasonable opportunities for the reuse and recycling of waste, including food waste.	Noted and accepted.
2bh	The EPA acknowledges that EIS Appendix N comprises an environmentally sustainable development report that proposes – (a) (in section 3.2) a range of water sensitive urban design measures "... which could be applied ...", including – (i) rainwater harvesting and re-use, and (ii) water efficient fixtures; and (b) (in section 3.1.1) a range of measures to maximise energy efficiency and minimise energy consumption "... to be considered ..." , including – (i) natural ventilation and lighting of all teaching and learning spaces, and (ii) installation of solar photovoltaic arrays. EIS section 10.5 appears to reiterate the mitigation and management measures contemplated by section 3.1.1 and 3.2 to EIS Appendix N, whilst the architectural drawings indicate the installation of rooftop solar photovoltaic array. However, the EIS does not appear to clearly state that the proponent would adopt the passive and active environmentally sustainable development measures outlined in EIS Appendix N. The proponent be required to commit to implementing the passive and active environmentally sustainable development measures outlined in EIS Appendix N.	Noted and accepted, however although natural ventilation is proposed to be used and the buildings have been designed to take full advantage of this, air conditioning is also proposed to be installed within internal teaching and learning spaces as an alternative if required for extreme weather events in accordance with NSW Government policy. The Additional passive and active environmentally sustainable measures identified in the EIS will be adopted by DoE.

3.3 Transport – Roads and Maritime Services

Table 3: Submissions from RMS

No	Submission Detail	Response
3a	No objections raised.	Noted There will be ongoing discussion with Parramatta City Council and the RMS regarding the approval for the funding for the pedestrian crossing facilities.

3.4 NSW Office of Environment and Heritage (OEH) – Heritage Division

Table 4: Submissions from NSW Office of Environment and Heritage (OEH) – Heritage Division

No	Submission Detail	Response
4a	The Statement of Heritage Impact prepared by Conrad Gargett dated June 2018 has assessed that the heritage significance of the Parramatta West Public School will not be impacted by the proposed development. However, the report has not outlined the impact of the proposal upon any potential historical archaeology, nor does it contain a detailed history of the site. The report notes in section 3.2 that the school is located on former government land known as the "Police Paddock". Furthermore, a historical archaeological assessment is not included in the EIS.	A Historical Archaeological Assessment (HAA) has been prepared and is included as Appendix F. The assessment found that the site is located within AMU 3094 and considered the potential for impacts on this area. The site was previously part of a police paddock used for grazing horses and cattle and was reserved for a school in 1934. It has generally remained clear since the 1790s and has been subject to various levels of disturbance and was subject to cut and fill in the 1960s. The area was found to be of low archaeological and research potential and the proposed development will not impact on any heritage items or archaeological relics. The HAA included the following recommendations: • <i>If changes are made to the proposed redevelopment or remediation action plan that may result in greater impacts than described here, then further historical archaeological assessment may be required.</i> • <i>The proposed redevelopment and remediation action plan can proceed with caution and without further historical archaeological assessment.</i> • <i>Unexpected historical archaeological relics remain protected under the Heritage Act 1977. If any archaeological relics or features are uncovered during the course of the redevelopment or remediation, work in the vicinity of the relic or feature must cease and the Heritage Division (Office of Environment and Heritage) must be notified.</i> • <i>If suspected human remains are discovered and/or harmed in, on or under the land within the study area, the following actions must be undertaken:</i> • <i>The remains must not be harmed/further harmed.</i> • <i>Immediately cease all works at that particular location</i>

No	Submission Detail	Response
		• <i>Secure the area so as to avoid further harm to the remains.</i> • <i>Notify the NSW Police and the Environment Line (OEH) on 131 555 as soon as practicable and provide any details of the remains and their location.</i> • <i>Do not recommence any work at the particular location unless authorised in writing by OEH.</i> The proposed development can therefore occur as proposed subject to the above recommendations which will be implemented as required for the proposed development.
4b	This AMU has moderate archaeological research potential. The land within this AMU was first used to hold cattle, and since the late 1850s, has been used mostly for residential purposes. The physical archaeological evidence within this area may include structural features, intact subfloor deposits, open deposits and scatters and individual artefacts which have potential to yield information about nineteenth-century housing, relating to major historic themes including Housing, Cultural Sites and Townships.	Noted – refer to response to Point 4a above.
4c	Archaeological evidence within this AMU is likely to be largely intact. This AMU is of Local significance.	Noted. As detailed in response to Point 4a above, the area was found to be of low archaeological and research potential.
4d	An historical archaeological assessment should be prepared by a suitably qualified historical archaeologist in accordance with the Heritage Division, Office of Environment and Heritage Guidelines 'Archaeological Assessment' 1996 and 'Assessing Significance for Historical Archaeological Sites and Relics' 2009. This assessment should identify what relics, if any, are likely to be present, assess their significance and consider the impacts from the proposal on this potential resource. Where harm is likely to occur, it is recommended that the significance of the relics be considered in determining an appropriate mitigation strategy. If harm cannot be avoided in whole or part, an appropriate Research Design and Excavation Methodology should also be prepared to guide any proposed excavations.	As noted in response to Point 4a, a HAA has been prepared and is included as Appendix F. The HAA has been prepared in accordance with the relevant guidelines and was prepared by a qualified historical archaeologist. As detailed above, no further assessment is required, and details of the findings and recommendations are included in the response to Point 4a and 1g above.

3.5 Transport for NSW

Table 5: Submissions from Transport for NSW

No	Submission Detail	Response
5a	The Applicant should consult with Roads and Maritime Services and Council regarding the status of the funding application for the proposed pedestrian facilities along Franklin Street at the intersection with Railway Street. There could also be merit to revisiting the funding application given the proposed expansion of the school.	Noted. Both Council and the RMS have been consulted in relation to these pedestrian facilities. Recently Saniya Sharmeen, Traffic Engineer from Parramatta City Council has confirmed that the application for pedestrian facilities in Franklin Street did not receive funding for construction in 2019/20 from RMS. Council will lodge its own applications later this year with RMS for 2020/21 State Funding. ARUP, the project traffic engineering consultant, recommends that Council be advised of the anticipated increase in school enrolments at Parramatta West Public School and that this be cited as further justification for funding in Council's next application to RMS.
5b	There is currently a pair of bus stops located on Crimea Street (TSN 215052 and TSN 215064, adjacent to No. 47 and 49 Franklin Street, respectively). Based on imagery provided by Google Maps (Aug 2017), no formal "Bus Zone" signage is provided alongside these bus stops. It is anticipated that the proposed expansion of the school into Burra Reserve and new frontage along Crimea Street (with pedestrian access) would likely increase the attractiveness of Crimea Street as a pick-up and drop-off point. The Transport Assessment also details observations of parents already utilising Crimea Street as follows: <i>"Due to the unrestricted nature of the parking in surrounding local streets and a lack of formal drop-off bays, some parents were found to park further away on surrounding local streets, such as Crimea Street, and walk to the school with their children."</i> (p.22) Given the increase utilisation of Crimea Street as a pick-up/drop-off point (particularly pick-up period), there is the potential that vehicles would park within the vicinity of the existing bus stops, potentially blocking their availability for the general public. The scope of the signage and line marking changes associated with	Section 3.1.4 and Figure 31 of the Traffic Assessment includes indicative details of the proposed bus signage. Figure 31 has been included below in Figure 7 for proposed Bus Zone signage to be installed in consultation with Parramatta City Council. Richard Searle, Service Manager Traffic and Transport at Parramatta City Council has confirmed that this can be dealt with outside the DA process.

No	Submission Detail	Response
	the proposed development should include the installation of "Bus Zone" signs along Crimea Street to address the potential impact of on-street parking on regular bus operations. It is recommended that the scope of the signage and linemarking changes associated with the proposed development includes the installation of "Bus Zone" signs along Crimea Street to address the potential impact of on-street parking on regular bus operations.	
5c	The proposed truck routes indicate that trucks intend to utilise part of the Liverpool- Parramatta T-Way fronting Parramatta Railway Station. The use of the transit way is limited to authorised vehicles and public bus services only. The proposed construction vehicle routes should be revised having regard for access restrictions on certain roads within the area.	The construction truck routes will be finalised by the Head Contractor as part of the management plan process. Indicative routes have been adjusted in Section A3.1 of the Traffic Assessment to avoid the Parramatta CBD. Details will be included in the final site / construction management plan and other supporting documentation which are currently being developed by the Head Contractor in consultation with DoE and other relevant stakeholders.
5d	TfNSW requests that DP&E should consider the following draft conditions should the development be approved. See below for recommended conditions.	Noted
5e	Green Travel Plan As part of the ongoing operation of the school, a detailed Green Travel Plan (GTP), which includes target mode shares for both staff and students to reduce the reliance on private vehicles, shall be prepared in consultation with Parramatta City Council. The GTP must be implemented accordingly and updated annually. The following additional advice is provided to the Applicant in the provision of the GTP. • The structure of the document should provide step-by-step guidance for the school to effectively lead the development, implementation and maintenance of a site specific GTP. • The GTP should be developed in close collaboration with the school community, including students. Existing and known future users and stakeholders should be given the opportunity to develop goals, objectives, targets, measures, strategies and initiatives.	Noted and accepted. An outline Green Travel Plan was submitted in Appendix FF of the EIS. This provides the framework for the school to implement Green Travel Plan initiatives which will be developed as part of a condition of consent prior to occupancy and commencement of operation of the new and refurbished facilities. The Green Travel Plan sets a realistic target reduction in staff car travel mode from 87% to 70%. This target will need to be confirmed in consultation with the school and staff. The plan recommends: • Provision of a Green Travel Plan information package to all staff which would include information on incentives to use sustainable means of transport e.g. pool bikes and car/taxi share system. • Set up a journey to/from school car share system for all staff who are willing to participate in the scheme.

No	Submission Detail	Response
	- The support of the Principal/Senior Management of the existing school should be sought at this early stage of the development proposal. Following this, it is recommended that a Travel Plan Working Group is established, to include the Principal, Senior management and staff representative, relevant NSW Government agencies and Council. - A nominated Travel Plan Coordinator should lead the development of the GTP on behalf of the school with this role transitioning to the school when appropriate. The option of a TP Coordinator serving several schools within a school cluster may be an approach the Department of Education and Communities may wish to consider. - The content of the document needs to be concise and of relevance to a school development and more specifically this school development. Some of the text in the current GTP is very general to organisational GTPs. - It is recommended that a baseline travel survey is undertaken of existing school community, the results of which will help inform the development of site specific objectives, strategies, initiatives, targets, measures, monitoring and evaluation, promotion, etc. - A comparison of modal shift targets achieved at similar school developments elsewhere is also recommended and will serve as an incentive for the school to understand that modal shift is achievable and to demonstrate benefits of GTP initiatives. - An Action Plan should be developed with timeline for implementation and person/agency responsible for actioning initiatives.	Introduce a taxi or pool car share system for trips during the day for staff. The Outline Green Travel Plan provides the framework for the school to implement Green Travel Plan initiatives. The school will need to set up a coordinator/committee to work out what strategies they want to adopt. A site specific Green Travel Plan will be prepared and implemented prior to the occupation of the new and refurbished facilities.
5f	Traffic and Parking Management Plan The Applicant shall prepare a Traffic and Parking Management Plan, which details the measures to safely manage the daily transport task to/from the school. Traffic management measures that need to be addressed include: - kerbside vehicle pick-up/drop-off management and orderly vehicle queuing; - maintaining bus accessibility and student waiting areas;	Noted and accepted. A Traffic and Parking Management Plan will be prepared by the school prior to the occupation of the new and refurbished facilities.

No	Submission Detail	Response
	- safe parent and student behaviour during pick-up/drop-off; and - safe pedestrian movements to the school entrances, minimising vehicle-pedestrian conflicts. The plan shall also detail the responsibilities of various personnel executing the plan and include measures to monitor, review the performance and make improvements to the plan. This plan should be implemented as part of the ongoing operation of the redeveloped school.	
5g	Signage and Linemarking Plan The Applicant shall prepare a detailed signage and linemarking plan of the proposed changes to kerbside parking restrictions to accommodate the various vehicle movements to/from the development within the local road network. The preparation of the plan should be made in consultation with and approved by Parramatta City Council. The approved kerbside parking restrictions must be implemented to the satisfaction of Council, prior to commencement of expanded school operations.	Noted and accepted. A detailed signage and line marking plan will be prepared, approved and implemented prior to the occupation of the new and refurbished facilities. Consultation will occur with Parramatta City Council and Roads and Maritime Services.
5h	Road Safety Audit A Road Safety Audit (RSA, refer to NSW Centre for Road Safety Guidelines for Road Safety Audit Practices and Austroads Guide to Road Safety Part 6: Road Safety Audit) shall be conducted on all relevant sections of road utilised for bus and private vehicle pick-up and dropoff, within the first three months of commencement of expanded school operations, a follow up RSA shall be conducted. Appropriate road safety measures and/or traffic management measures shall be implemented based on the outcomes of the RSA in consultation with Parramatta City Council.	Noted. A Road Safety Audit (if conditioned) will be undertaken at the appropriate time.
5i	Construction Pedestrian and Traffic Management TfNSW requests that the applicant prepares a Construction Pedestrian and Traffic Management Plan in consultation with the Sydney Coordination Office (SCO) within TfNSW and be endorsed by the SCO prior to any construction activity on the site. The Construction Pedestrian and Traffic Management Plan (CPTMP) needs to include, but not be limited to, the following:	Noted and accepted. Details will be included in the final site / construction management plan and other supporting documentation which are currently being developed by the Head Contractor in consultation with DoE and other relevant stakeholders.

No	Submission Detail	Response
	• Location of all proposed work zones; • Haulage routes; • Construction vehicle access arrangements; • Proposed construction hours; • Estimated number and type of construction vehicle movements including morning and afternoon peak and off peak movements for each stage of construction; • Construction program highlighting details of peak construction activities and proposed construction 'Staging'; • Any potential impacts to general traffic, cyclists, pedestrians and bus services within the vicinity of the site from construction vehicles during the construction of the proposed works; • Cumulative construction impacts of projects in the Parramatta CBD including the Parramatta Light Rail (PLR); and • Measures proposed to mitigate any associated general traffic, public transport, pedestrian and cyclist impacts should be clearly identified and included in the draft CPTMP. The Transport Assessment indicates proposed truck routes for the construction of the development which includes heavy vehicles travelling through the Parramatta CBD to/from the site. It should be noted that several construction projects within the Parramatta CBD are likely to occur at the same time as this development. The cumulative increase in construction vehicle movements from these projects could have the potential to impact on general traffic and bus operations within the CBD, as well as the safety of pedestrians and cyclists particularly during commuter peak periods. During the construction and operation phases of the Parramatta Light Rail Project (PLR) there will be intermittent, short and long term road closures, as well as material changes to road network operations. These changes may impact pedestrian, cyclist and vehicular access routes to the proposed development.	

Figure 7: Crimea Street indicative Bus Zone from Amended TIA (Source: ARUP – Figure 31)



Reference Point 5b

3.6 Government Architect NSW

Table 6: Submissions from GA NSW

No	Submission Detail	Response
6a	The school is currently in a suburban setting but no information has been provided to show how it will integrate with potential future development in the surrounding area.	The immediately surrounding area to the school has not been specifically identified for higher density development and appears in the short to medium term that it will remain as low / medium density residential development intermingled with commercial / community facilities. The proposed new building fits within the suburban setting of the existing and known future residential / commercial / community facilities and reflects modern design elements. The minor variation to the height control of the area is kept to the centre of the site and will not have adverse impacts on the adjoining properties and is not out of character. The building has been kept to 2 storey in height to reflect the nearby development and has a detailed landscape strategy to ensure as many trees as possible are retained on site along with additional plantings. Contextual images have been provided in Appendix E – Drawings 4 and 5. These images show how the proposal would fit into the area in terms of scale and should surrounding development be built to the permissible height limits.
6b	The school will be spread across two sites on either side of Railway St. While the pedestrian crossing is noted to be upgraded, the recommendation to create a shareway in Railway street, linking the two sides of the school campus through a raised pedestrian crossing, has not been addressed.	A raised shareway was not supported by the RMS or Transport NSW. DoE, however, will continue dialogue with the authorities to address the separation of the two school campuses by Railway Street. In the interim, the pedestrian crossing will be managed appropriately for connection between each side of the school as required.
6c	The setback of the palisade fencing around the new entry to the north site buildings off Railway St is supported, however there is no attempt to use the building facades as secure lines rather than relying on fencing.	DoE Security has advised the building edge should not be used to establish secure lines. To ensure appropriate security measures are in place, DoE Security advised 2100mm high boundary fencing should be used on-site (including the playing fields) for the following reasons:

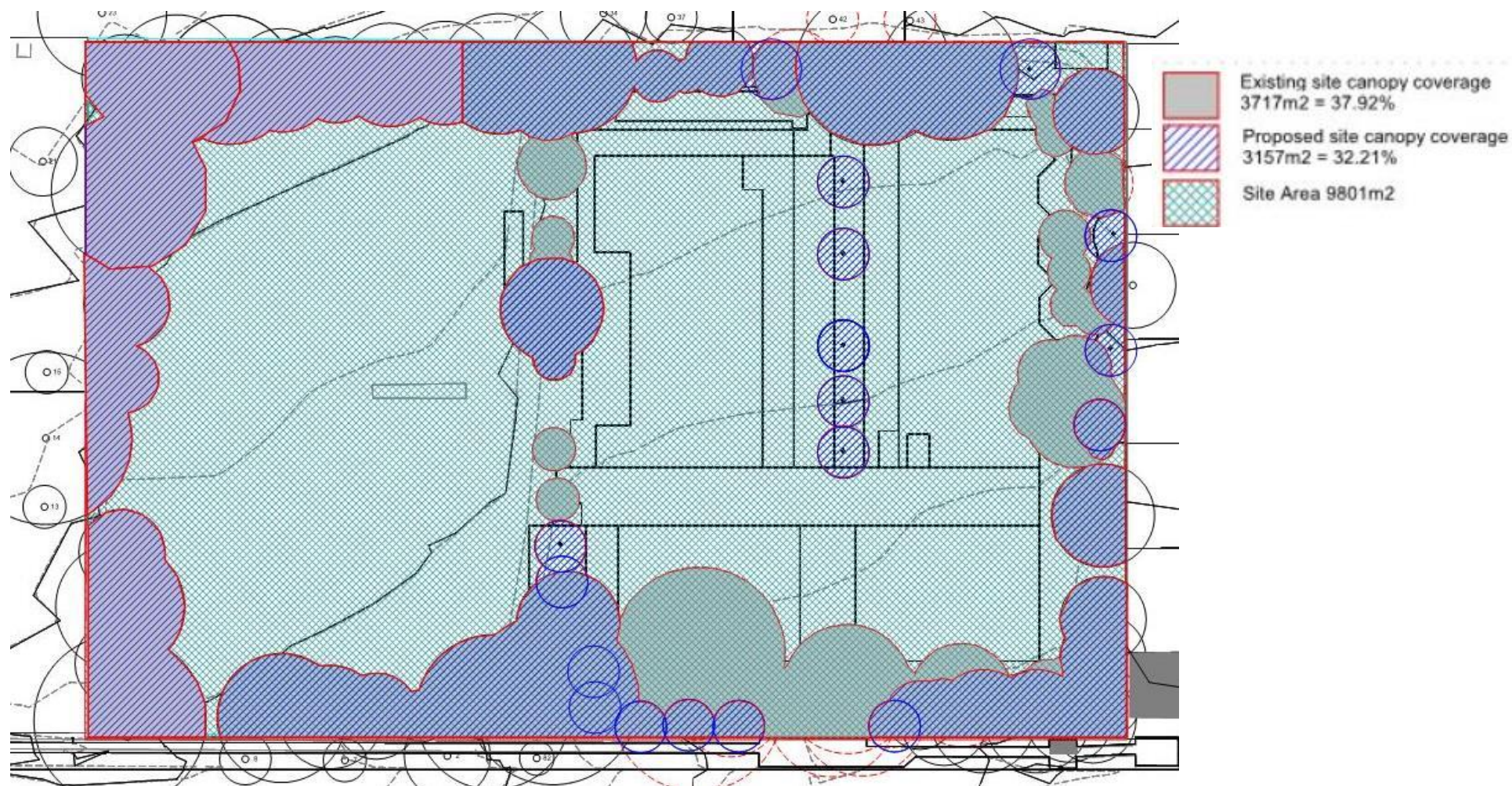
No	Submission Detail	Response
		• Boundary fencing would prevent after-hours access to the buildings and reduce potential for loitering and vandalism; • The perimeter fencing provides a critical line of security to maintain the safety of students from potentially leaving the premises; and • As the ground floor along Railway Street sits lower than the street level, the direct line of surveillance from the street is potentially compromised. The above provisions will not impact on the ability for community use of the facilities and have been considered within the CPTED Report which has been amended and included in Appendix I. It should be noted that the introduction of perimeter fencing in NSW Government Schools has significantly decreased incidents and property vandalism.
6d	The Railway St building elevation does not provide sufficient articulation of the large form in response to the scale and patterns of the surrounding context.	Consideration of the scale of the neighbouring buildings has been addressed on the Railway Street façade through the use of varied materials and articulated windows that serve to break up the mass. The building is set down from the street line to reduce the scale and landscaped areas are proposed in front of the building to reduce impacts. As mentioned in response to point 6a, images have been provided that consider the site in context to the surrounding development. In addition, Appendix E – Drawing 3 includes an image of the Railway Street elevation and how it has been articulated and designed to respond to the locality.
6e	There is no evidence that Aboriginal culture and heritage has been incorporated into the design.	The school currently has a strong relationship to the local Aboriginal community, including a bush food garden. The proposed new building includes Aboriginal art influenced panels which could be designed in conjunction with the local community. In addition, yarning circles are proposed in suitable locations on-site. Further, the centre courtyard gardens have been designed to reflect the indigenous heritage of the area and comprise indigenous plant species that meet the EFSG requirements.
6f	An integrated landscape strategy across both north and south sites was requested and has not been provided.	The landscaping strategy for the north site has been designed to respond to the character of the south site and the existing culture of the school. There will be no plantings on the south site as part of

No	Submission Detail	Response												
		this proposal. Consideration will be given to landscaping as part of the demountable removal on the south site when the play space is being re-instated. The connection to landscape is important to the school community, many of whom live in apartment buildings in the surrounding area, with little access to green space in the home. Visual and physical connections to the landscape have been an important driver of the design of the northern site. The school values its existing connections to the local indigenous history of the Parramatta area. The south site has an unofficial indigenous garden setting that compliments the weaving of Aboriginal pedagogy into the teaching at the school. The landscape design of the north site takes this into account and provides Aboriginal heritage planting sections that can become part of the learning setting and outdoor learning areas in which a yarning circle tradition can develop.												
6g	A detailed open space calculation across both playgrounds in relation to the numbers of existing and proposed students has not been provided.	The open space calculation has been provided in Appendix E – Drawing 2 based on the future student numbers. The open space proposed is in exceedance of the EFSG requirement of 10m ² per student at 11.4 m ² per student.												
6h	Drawings indicating potential future development in the surrounding area in response to current zonings and controls have not been provided.	The surrounding development has been considered in the design of the new building as has the potential future character of the area. Some indications of future development surrounding the site have been included in Appendix E – Drawings 4 and 5. These show how the current zonings could potentially be developed.												
6i	A clearly defined community use strategy to ensure easy and controlled community use of the school facilities after hours has not been provided.	All schools come under a general DoE strategy for the community use of buildings and spaces at public schools in NSW. Applications can be made to use these spaces directly with the school. The EIS included details of the uses already being undertaken at the school and the following updated information is provided relating to existing uses at the school. <table data-bbox="1176 1302 1832 1461"> <tr> <td data-bbox="1176 1302 1384 1334">Monday</td><td data-bbox="1395 1302 1541 1334">PM</td><td data-bbox="1552 1302 1697 1334">Taekwondo</td></tr> <tr> <td data-bbox="1176 1342 1384 1374"></td><td data-bbox="1395 1342 1541 1374">PM</td><td data-bbox="1552 1342 1832 1374">Nova Ukrainian School</td></tr> <tr> <td data-bbox="1176 1382 1384 1414">Wednesday</td><td data-bbox="1395 1382 1541 1414">PM</td><td data-bbox="1552 1382 1821 1414">Auburn Calvary AOG</td></tr> <tr> <td data-bbox="1176 1422 1384 1453">Thursday</td><td data-bbox="1395 1422 1541 1453">PM</td><td data-bbox="1552 1422 1697 1453">Taekwondo</td></tr> </table>	Monday	PM	Taekwondo		PM	Nova Ukrainian School	Wednesday	PM	Auburn Calvary AOG	Thursday	PM	Taekwondo
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No	Submission Detail	Response																								
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6j	There is no information about tree canopy targets in accordance with NSW Urban Tree Canopy Targets (ref. GANSW's Greener Places).	The existing Parramatta West Public School (north site) has a tree canopy coverage of 37.92%. This coverage will be initially reduced to 32.21% with the construction of the new buildings, however over a 10 year time span, the site and vegetation is capable of achieving the 40% State target. In addition, it should be noted the future removal of the demountable classrooms on the south site may also provide further opportunity to expand the canopy cover on the south site. It should be noted that the school is currently and will continue to be well above the overall current canopy coverage of only 26% for the Parramatta City Local Government Area. Figure 8 shows the canopy calculations for the school.																								
6k	On the basis of the materials submitted, we recommend the issues raised above be addressed through: 1. An updated site strategy with sketches and diagrams to support the current proposal. 2. Drawings which show the potential future development of the surrounding area. 3. Identification of tree canopy targets in accordance with NSW Urban Tree Canopy Targets (for further guidance see: GANSW's Greener Places).	In response: 1. Amended landscape plans have been prepared that incorporate perimeter fencing, reduced numbers of yarning circles and any changes to the landscape plantings. No specific landscape strategy was prepared, however as detailed in Point 6f above the landscape of the south site was used as a basis for landscaping elements on the north site to ensure consistency. 2. An overview of the area and potential development opportunities has been considered in Appendix E – Drawings 4 and 5. (Refer to Point 6h) 3. Figure 6 below includes tree canopy targets for the north site in accordance with the guidelines. (Refer to Point 6j)																								

No	Submission Detail	Response
		Refer to comments above in response to these concerns, points 6a through to 6j for more detail.

Figure 8: Tree Canopy Calculations for North Site (Source: Conrad Gargett)



Reference Point 6j, 6k and 7j

3.7 Office of Environment and Heritage

Table 7: Submissions from Office of Environment and Heritage

No	Submission Detail	Response
7a	The Arborist reports recommends the <i>Eucalyptus nicholii</i> trees No 2, 10, 20 and 23 (street tree) to be retained and protected. However, the Tree Protection zone of Tree 23 may be impacted by the proposal given the preferred vehicular access road encroaches in to the TPZ as shown on the Tree Protection Plan by Urban Arbor P/L.	The vehicular access has been amended to protect Tree 23 and the other <i>Eucalyptus nicholii</i> trees. Details will be included in the final site / construction management plan and other supporting documentation which are currently being developed by the Head Contractor in consultation with DoE and other relevant stakeholders.
7b	These trees have been identified as threatened species and OEH previously advised in its letter dated 4 September 2018 in agreeing to a biodiversity Development Assessment Report waiver (BDAR) that "if the footprint of this project changes such that the three trees of the threatened species, Narrow-leaved Black Peppermint (<i>Eucalyptus nicholii</i>) which occur on the northern and western boundaries of the site are impacted, an assessment of significance in accordance with section 7.3 of the Biodiversity Conservation Act 2016 should be undertaken prior to approval. The outcome of this assessment may affect this decision to waive the requirement for a BDAR."	As stated above in response to Point 7a the access can be amended to avoid this tree. Therefore, no further assessment is required.
7c	It is recommended that a condition be included on any forthcoming consent that states: In accordance with the recommendations of the Arborist report, the <i>Eucalyptus nicholii</i> Trees No 2, 10, 20 and 23 that are threatened species are to be retained.	Noted and accepted.
7d	With reference to the Plant Schedule - Shrubs and Groundcovers - Sheet 1, OEH recommends that native plant species are used throughout the site. For the Parramatta LGA, research has identified the following weed species as having suitable habitat in the LGA and as problematic given the threat to threatened weed species under both current and future climate change conditions http://weedfeatures.net/map.php#	Noted. Vegetation selection will be based on native species recommended for use in the EFSG and based on indigenous direction from the south site. (Refer to Point 6f above).
7e	OEH notes that the SEARs did not require the preparation of an Aboriginal Cultural Heritage Assessment (ACHAR) or consultation as required by OEH guidelines. It is noted that the proposed new	An ACHAR has been prepared and is included as Appendix A. Refer to response to Point 1a above. This assessment concludes that the site is of low scientific, aesthetic, historical and social

No	Submission Detail	Response
	buildings on the northern side of Railway Street on Burra Reserve involve excavation into the natural ground level as shown on <i>Figure 26: Proposed east elevation of the new school building</i> . Burra Reserve which is part of the project site is currently grassed. The Statement of Heritage Impact prepared by Conrad Gargett dated 21 June 2018 includes aerial photography from 1943 (Figure 1 below) that show the site as being vacant of any structures. Given this, the site may contain the presence of Aboriginal Cultural Heritage, however no assessment has been undertaken of the site.	significance and the likelihood of impact on Aboriginal objects or places is extremely low.
7f	OEH notes that the proposal requires excavation that may impact on sub-surface Aboriginal objects if present. As such OEH preference is for the preparation of an Aboriginal Cultural Heritage Assessment Report (ACHAR). The ACHAR is to identify, describe and document the Aboriginal cultural heritage values that exist across the whole area that will be affected by the development. This may include the need for surface survey and test excavation. The identification of cultural heritage values must be conducted in accordance with the Code of Practice for Archaeological Investigations of Aboriginal Objects in NSW (OEH 2010), and guided by the <i>Guide to investigating, assessing and reporting on Aboriginal Cultural Heritage in NSW</i> (DECCW, 2011).	Refer to response to Point 1a and 7e above.
7g	Consultation with Aboriginal people must be undertaken and documented in accordance with the Aboriginal cultural heritage consultation requirements for proponents 2010 (DECCW). The significance of cultural heritage values for Aboriginal people who have a cultural association with the land must be documented in the ACHAR.	The ACHAR was prepared in accordance with the <i>Aboriginal cultural heritage consultation requirements for proponents 2010</i> (DECCW). This Assessment report included consultation with the Aboriginal people which was appropriately documented and recorded. Refer to Section 3 and Appendices A-D of the ACHAR included as Appendix A.
7h	The proposal significantly increases the percentage of impervious surface coverage. In order to reduce runoff and improve the water quality discharged from the site, a variety of WSUD measures need to be implemented	Appropriate WSUD measures have been included and are addressed in the stormwater report and plans included with the original EIS. The proposed WSUD measures include: • Use of water efficient fixtures and fittings; • Water monitoring systems to identify leaks or the like; and • Rainwater collection and reuse with two x 5kL reuse tanks.

No	Submission Detail	Response
7i	The following water quality treatment measures are proposed which OEH supports and these need to be conditioned on any forthcoming consent as follows: - To meet water quality targets and reduce pollutants entering waterways, the proposal must comply with the Stormwater Management Plan prepared by Adams Consulting Engineers and include the following water quality treatment measures: 16x Stormwater360 Psorb (MMC) Stormfilter Cartridges 8x Trash Screens/ Stormwater360 Enviropod 200 inserts 2x 5Kl Rainwater Tank - A regular maintenance program for the above must be documented and implemented.	Noted and accepted.
7j	OEH recommends the development incorporate green walls, green roofs and/or a cool roof into the design. Green roofs can increase habitat and biodiversity at the site, particularly if local native plant species are used from the relevant native vegetation community. A good opportunity exists to increase the long term sustainability outcomes of the proposal, given the significant areas of flat roofs proposed and impervious areas on site and to offset the loss of grassed open space through green roofs/walls. Additional green cover on site will assist with reducing the urban heat island effect, local temperatures and contribute to meeting Greater Sydney's urban tree canopy target of 40 per cent consistent with the District Plan's Planning Priority.	Whilst it is noted that the canopy coverage will be initially reduced to 32.21% with the construction of the new buildings, over a 10 year time span, the site and vegetation is capable of achieving the 40% State target. (Refer to Figure 8) In addition, it is important to note the school is currently and will continue to be well above the overall current canopy coverage of 26% currently being achieved in the Parramatta City Local Government Area. Further, the potential removal of demountables on the south site provides additional opportunities to increase the potential green space available on-site. Given the above, SINSW has concluded the use of green walls or roofs is not required to provide suitable sustainability outcomes or to achieve the urban tree canopy target identified in the District Plan. Further, many schools that have included green walls / roofs in their designs are experiencing vermin problems, which is not appropriate for a school environment.
7k	OEH also recommends that the NSW and ACT Governments Regional Climate Modelling (NARciM) climate change projections developed for the Sydney Metropolitan area used to inform the building design and asset life of the project. These include over 100 climate variables, including temperature, rainfall, hot days and cold nights, severe Forest Fire Danger Index (FFDI) and are publicly	Noted. Whilst no formal assessment has been conducted, the building has been designed with best practice initiatives in mind to mitigate the risk of climate change. These include passive design measures so the spaces can be used under hot and cold extremes, selection of mechanical plant to manage extreme temperatures, careful selection of landscaping, roof design to

No	Submission Detail	Response
	available online and at fine resolution (10km and hourly intervals) for 20-year time periods: 2020-2039 near future and long- term 2060 - 2079.	withstand hail and heavy rain events, stormwater planning and flooding risks.

3.8 Sydney Water

Table 8: Submissions from Sydney Water

No	Submission Detail	Response
8a	The development site is within Prospect Hill Water Supply Zone. Sydney Water is currently planning for water-related services to support growth within the Greater Parramatta and the Olympic Peninsula (GPOP) growth area over the next 10 years. The proposed development is located inside GPOP and is within the project study area. Immediate growth can be accommodated by existing water supply system, however, Sydney Water anticipates that augmentations will be required within the next five years to support growth in the wider GPOP. Detailed service requirements for this development can be provided when Sydney Water has more information on the development program.	Noted. Sydney Water will be contacted when the development program is known.
8b	If this commercial development is going to generate trade wastewater, the developer must submit an application requesting permission to discharge trade wastewater to Sydney Water's sewerage system. Applicant must wait for approval of this permit before any business activities can commence.	Noted.
8c	A Section 73 Compliance Certificate under the Sydney Water Act 1994 must be obtained from Sydney Water. The proponent is advised to make an early application for the certificate, as there may be water and wastewater pipes to be built that can take some time. This can also impact on other services and buildings, driveways or landscape designs.	Noted. This application will be submitted in due course.
8d	All properties connected to Sydney Water's supply must install a testable Backflow Prevention Containment Device appropriate to the property's hazard rating. Property with a high or medium hazard rating must have the backflow prevention containment device tested annually. Properties identified as having a low hazard rating must install a non-testable device, as a minimum.	Noted.

3.9 Parramatta City Council

Table 9: Submissions from Parramatta City Council

No	Submission Detail	Response
Loss of Open Spaces		
9a	The proposed location of the new northern building will result in a significant loss of open space that is 'used as a playground during lunch and recess' and can adequately accommodate sporting and other active recreational activities. Access to the existing quantity of open space provided by the northern school site is essential for the 900+ students to be able to satisfactorily meet the physical education requirements of students consistent with the Department of Education 'Sport and Physical Activity Policy' . This policy requires that "...Students in Years K-10 participate in a minimum of 150 minutes of planned moderate with some vigorous physical activity across the school week".	The EFSG requires a minimum of 10m ² of open space per student. The proposed development exceeds the minimum requirements of the EFSG, with 11.4m ² of EFSG compliant open space provided per student (see Appendix E – Drawing 2).
9b	The significantly reduced open space within the school will have inadequate capacity to accommodate physical activity requirements of the large volume of students during school hours.	As outlined in Point 9a above, the proposal exceeds the EFSG requirements for student play space.
9c	Councils draft Social Infrastructure Strategy (SIS) has identified that the majority of our existing sports fields are at capacity, with nearby Jones Park and Ollie Webb Reserve already 'operating far above capacity' at current usage rates. Demands on Councils open spaces (particularly sporting fields) will be exacerbated by forecast future population growth associated with increasing residential densities in the surrounding area, with Jones Park and Ollie Webb Reserve not able to accommodate the additional demand created by the reduced open space within the school.	The open space currently used by the school on the north site is playground area only and is not capable of catering for formal sporting events such as games of cricket, soccer, football and the like. Informal sporting activities will still be able to be undertaken on the remainder of the north site as required by the school. As outlined in response to Points 1r – 1t above, the revised SIA prepared to support the proposal confirms the use of open space external to the school will not increase as a result of the proposal, with formal sporting events and sports carnivals continuing to occur as per the school's current usage profile (see Appendix G). Further, additional analysis of the open space available at the completion of the project demonstrates sufficient area will be available to cater for the new student load in accordance with the EFSG requirements (see Appendix E – Drawing 2).
9d	The Social Impact Assessment (SIA) accompanying the EIS inadequately addresses the impact of open space loss and has not considered the findings of Councils SIS. It incorrectly assumes	As outlined in response to Points 1r to 1t above, an amended SIA has been prepared and considers the findings of Council's SIS. In this regard, the revised SIA concluded the proposal would not

No	Submission Detail	Response
	that 'Playing fields, additional parks and areas of passive open space are available nearby within walking distance' and needs to be revised to reflect the findings of Councils draft SIS. The SIA also needs to demonstrate how the impacts of reduced open space will be addressed to ensure that students will be able to meet the physical activity requirements of the Department of Education 'Sport and Physical Activity Policy' in the context of the limited capacity of nearby Council open space.	have any unreasonable impacts on outdoor play areas on-site, or the availability of open space in the locality for the following reasons: • Whilst the Draft City of Parramatta Social Infrastructure Strategy identifies local sporting fields (Jones Park and Ollie Webb Reserve) are at capacity, the existing oval on the north site does not support any formal sporting activities (i.e. organised team sports) and is currently used as an informal play space for students. • Formal physical education requirements for students are currently pursued off-site under current operating conditions and Council agreements. The proposal would not increase the frequency of the school's use of Jones Park or Ollie Webb Reserve for athletics carnivals or organised sport. • Open space and school buildings would remain available for community use as per the current arrangements, which requires the lodgement of a formal request to use these spaces.
9e	The proposed significant reduction in open space within the school site is also inconsistent with applicable State planning provisions and strategies, which recognise the importance of open space for physical and psychological wellbeing and development, including: • Healthy Urban Development Checklist (NSW Health) • Central City District Plan • Design Guide for Schools (NSW Government Architects)	The proposal will exceed the minimum open space requirements outlined in the EFSG. In addition, the home bases and landscaped areas have been designed to facilitate and encourage outdoor learning opportunities. Accordingly, DoE has concluded the proposal will provide high quality outdoor open space which promotes physical activity and psychological wellbeing in accordance with the objectives of the relevant State plans and policies.
9f	Whilst it is acknowledged that the school would need to continue to operate whilst the new facilities are under construction, the existing demountable buildings could be temporarily relocated into the northern open space site during works. This would allow for the required new educational facilities to be incorporated into the southern site and enable retention of northern site as open space, providing for a significantly better outcome that is more consistent with applicable planning provisions, policies and strategies.	This is noted however, the school and DoE have concluded the provision of open space areas on both sides of the school would maximise student learning outcomes whilst minimising potential heritage and amenity impacts at surrounding residential premises. Building more permanent structures on the south site would potentially create an overcrowded site with limited play space, could adversely impact on the heritage items on the south site and could have similar neighbour concerns.

No	Submission Detail	Response
9g	Revise the Social Impact Assessment to reflect Council's draft Social Infrastructure Strategy and more adequately address the loss of open space provision within the school.	Refer to comment in response to Point 9c. The SIA has been amended and is included in Appendix G.
9h	Incorporate new buildings into the southern site and retain existing northern site as open space consistent with the Central City District Plan (Planning Priority C17), Health Urban Development Checklist (PA3) and Design Guide for Schools (Principle 5).	This was considered as an option and discounted by the school and DoE. Refer to comments above and details included in the revised options analysis included in Appendix B.
Urban Design		
9i	The proposed new building has in some respects an industrial aesthetic. This is at odds with the predominant residential aesthetic of the existing school buildings (in particular the historic school buildings) and of the surrounding low density residential area. Modulation of the façade should be provided to reduce bulk, breaking roof planes into smaller areas, use of design features to provide fine grain visual interest, materials that are not industrial in character, windows set on the inside face, and appropriate colours.	The design has been developed in consultation with the project heritage consultants and reviewed by the Government Architect to ensure the proposed buildings respond to the heritage buildings on-site and the character and context of the surrounding residential and civic uses. Further, the design has been developed to respond to the school needs and feedback received from the local community.
9j	The scale of the building is considerably larger than that of the existing school buildings and is at odds with the scale of surrounding development. The bulk of the building should be reduced, in particular the scale of the Franklin Street façade.	Due to the accommodation requirements of the school and the new learning environments created by the changes in education requirements, the building is by nature larger in scale and floor area than the existing school buildings located on the south site. Over time education needs change and the EFSG reflect these changes. It has also been necessary to consolidate the building footprint in order to maximise the open space areas. In addition, the Franklin Street façade (to the east), has been reduced in scale, and set back from the boundaries with the dwellings (including extensive landscaping) to provide a comparative scale of development. Refer to additional sketches included in Appendix E.
9k	The building should be set further back from the side boundary in order to protect the amenity of neighbouring residents and to retain existing trees.	The building is setback approximately 7-10m which allows the retention of the majority of the trees and vegetation along the eastern boundary. Further additional trees and vegetation is proposed to be planted in this area.

No	Submission Detail	Response
		The building meets the setbacks and is over and above what would be required if the site were developed for residential use as permitted under the Holroyd LEP 2013 (i.e. 900 mm setbacks permitted for residential development). The overshadowing is minimal and complies with the provisions of Council and State policies on the basis that existing residential premises will continue to receive over 3 hours of sunlight between 9am and 3pm during the winter solstice. The privacy of residents is maintained by angling of windows and use of options for glazing to ensure overlooking from the classrooms is not possible. Noise is also reduced by the location of the hall in the middle of the site and angled windows to direct any potential noise from classrooms away from residences. Further, the noise from the current use as a playground would be greater than the proposed use as classrooms and the buildings would assist to mitigate any noise from the play space to the west that is being retained on the site. The acoustic report concluded that normal operation of the school would not generate excessive noise for nearby residents. The report included the following recommendations to manage specialised activities on-site: • The hall should not be operated beyond 10pm (earlier for concerts – see below). • No use of amplified music under communal operation. • Concerts should be restricted to daytime and no later than 6.00pm. • Under concert operation the hall must be fully closed and noise level controlled to ensure compliance. • The façade of the hall should be designed based on the glazing and construction included in the report, this would be relevant for the detailed design phase. • Ensure occupants / users enter and leave the premises quietly.
91	The building should be sited so as to protect all existing significant canopy trees – along the side boundary as well as the street boundary. New trees should also be planted along the entire	As many trees as possible are being retained on the site and new plantings are proposed where trees are to be removed. Refer to landscape plans included with original application and updated plans included in Appendix J.

No	Submission Detail	Response
	length of the Railway Street boundary. The trees should be tall trees (over 13 metres) with spreading canopies.	
9m	Consider upgrading the existing pedestrian crossing.	This was considered and it was determined that the existing pedestrian crossing on Railway Street meets current safety requirements. Parramatta City Council traffic section has provided advice in this regard. (Refer to details of meetings included in Section 1.1 the updated TIA included in Appendix K). Refer also to response to Point 3a above.
9n	The retained playing field should remain public accessible.	DoE has a community use policy applicable to all schools across the State. The school is currently managed in accordance with this policy (i.e. requests for use must be approved by the school). It should be noted that the open space areas on the north site comprise playground areas rather than playing fields and do not currently enable organised sporting activities to occur on-site.
Height		
9o	The height of the development exceeds the maximum 9m height control stipulated by the Holroyd Local Environmental Plan 2013.	Clause 42 of the SEPP (EE&CC) 2017 allows development consent to be granted for the purpose of a school that is State significant development even though the development would contravene a development standard imposed by the SEPP or any other environmental planning instrument under which the consent is granted, including the LEP. However, the EIS still considered how the variation would impact on the area. As stated in the EIS, the maximum extent of departure is 1.697 metres at the roof ridge. This represents a variation of approximately 18.9% to the Holroyd LEP maximum height control. However due to the slope of the site the height varies across the development with an average departure of only 0.012 metres or 0.1% based on the heights over each elevation. Therefore, there is only a minor change in height from the Holroyd LEP and this is in the middle of the site which does not create any adverse impacts in terms of overshadowing or the like. The proposed building has been located away from the common boundary with adjoining residences to remove any potential impacts from the minor variation.

No	Submission Detail	Response
		The EIS considered how the building addressed the objectives of the Height of Building clause. The proposal is considered to generally satisfy the height clause objectives for the following reasons: • There are no adverse visual impacts of the proposal on the school, streetscape or amenity of the area; • The proposal will not inhibit neighbouring properties solar access for more than approximately 2 hours during the winter solstice as shown in the shadow diagrams provided with the EIS and included Appendix H; • The design of the building adjoining neighbouring properties includes architectural and landscaping elements to reduce the potential for adverse privacy impacts; • The height of the building will present an attractive architectural element to the school and surrounds; • The proposal has been designed with the slope of the site and this is one of the reasons for the relatively minor height variation and the differences in height variation across the building footprint; • The height will reduce the hard stand footprint of the building and thereby increase the availability of outdoor play and learning areas; and • It is an important expansion of public infrastructure which is consistent with surrounding landform, scale and intensity.
9p	In order to minimise adverse impacts on the streetscape and on adjoining residential properties the height of the development should comply with the 9m maximum control applicable to the site.	As noted above, although there is a minor variation in height, this is considered acceptable and the EIS included justification for the variation, some of which is expanded on in the response to point 9o above. The only street elevation that includes a small portion over the height limit is the northern elevation. Refer to Figure 9 below that shows the only portion of the building over the height limit at a street frontage. The other height variations are setback from the boundaries or the street to reduce any potential impacts.

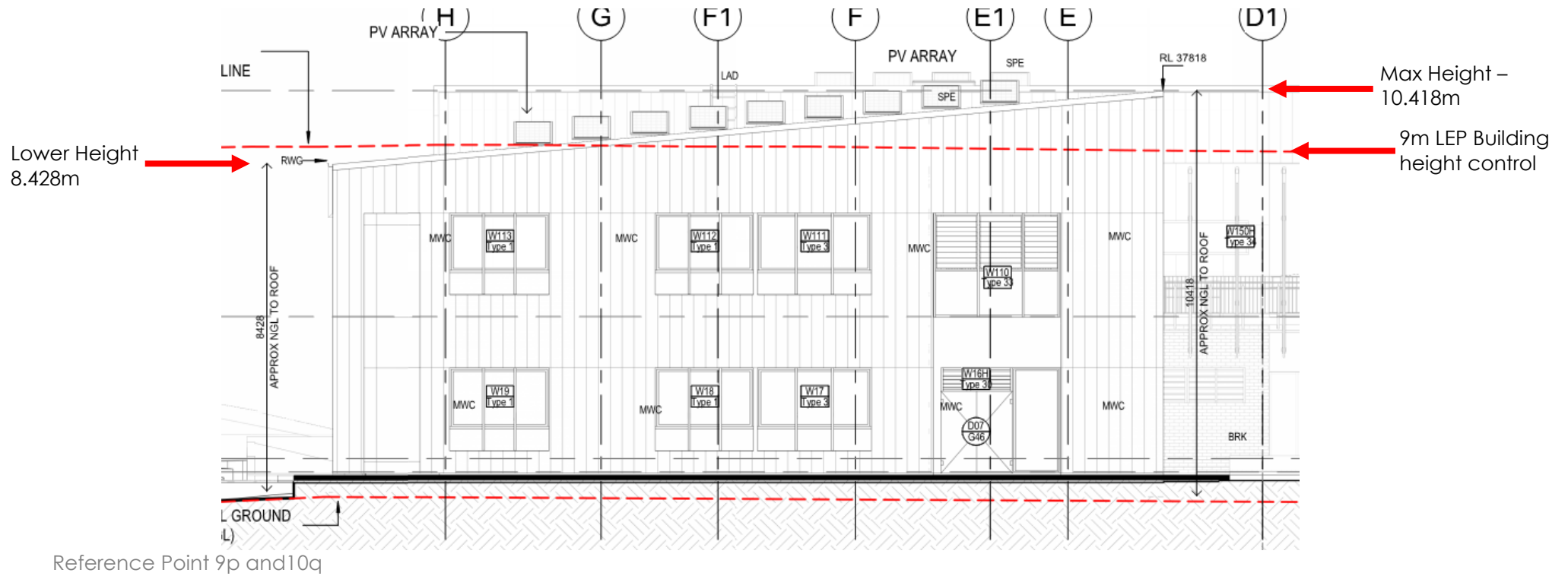
No	Submission Detail	Response
Pedestrian Refuge Island in Franklin Street		
9q	The pedestrian refuge island in Franklin Street should be constructed on the north side of Railway Street in a manner such that it can easily be upgraded to a pedestrian crossing by Council if the numbers of pedestrians meet the RMS requirements for a pedestrian crossing.	The pedestrian refuge island has been included in the Council's funding application for the pedestrian crossing to the RMS. The final design of the pedestrian crossing facility will be confirmed once funding is resolved.
Amenity of Nearby Residents		
9r	It is recommended that a greater setback is proposed between the new building and the eastern boundary of the site and windows be reduced/made highlight windows to reduce overlooking and acoustic impacts to adjoining properties.	Refer to comments in response to Point 9k above.
9s	It is also recommended that dense landscape screening is proposed within the eastern boundary setback area of the site to assist with screening of the development and to reduce potential visual impacts from adjoining properties.	Refer to comments in response to Point 9k above.
Trees		
9t	There are a number of mature existing trees located on the subject property which will either incur impacts or require removal in order to facilitate the proposal. The following recommendations are made:	
9u	Existing mature trees, assessed by a AQF Level 5 Arborist, should be retained where possible. Consideration should be made for the retention of existing mature trees and vegetation to the perimeter boundaries of the site with additional supplementary planting to provide screening and scale to the built form whilst strengthening locally endemic plant communities.	All trees are being retained where possible. The arborist report (included as Appendix F of the EIS) has identified those trees proposed to be removed and the landscape plan identifies vegetation to be planted to replace the trees that require removal.
9v	A recommendation is made to engage a AQF Level 5 Consulting Arborist to provide advice as to suitable locations and planting distances for large trees to minimise risk to high pedestrian zones and impacts to infrastructure.	Noted. This can be considered during construction. It should be noted that the arborist that prepared the report as part of the application was level 5 qualified.
9w	The engagement of a AQF Level 5 Arborist ('Project Arborist') to provide an Existing Tree Management Plan to incorporate	Noted and accepted for construction management.

No	Submission Detail	Response
	tree protection measures in accordance with AS4970-2009 (Protection of Trees on Development Sites).	
9x	The Project Arborist must supervise all constructions works, including demolition and site management, within five (5) metres of any existing tree to be retained.	Noted and accepted for construction management.
Social Impacts		
9y	The SEARs report does not provide an adequate assessment of the potential positive and negative social impacts of this development nor appropriate mitigation strategies.	Refer to comment in response to Point 9c. The SIA has been amended and included in Appendix G.
9z	The SIS (page 60) states that "...No adverse impacts have been identified on the adjoining public open space areas as a result of the development". Council Officers are not satisfied at this point in time with the level of information and evidence provided in support of this statement. Given the location of the site to Council's existing sporting field sites of Ollie Webb Reserve and Jones Park, it is highly likely that due to the gap in provision of open space as apparent in the proposed development application, the school will rely on the assumed availability of Council's nearby open space facilities to meet the recreation needs of its students.	Refer to comment in response to point 9c above. Further, it should be noted that the school already has an agreement with Council to use Jones Park on a Friday as part of their sporting program and this is not proposed to change. No additional use is proposed or required. Also refer to updated SIA included as Appendix G.
9aa	Some schools are heavily reliant on using Council's open space for their sporting activities due to reduced availability of facilities within school grounds and growing student numbers. The impacts of this are already being felt. The open space available within schools across the LGA is gradually diminishing due to the need for DOE to build on their open spaces to accommodate growing demand for school places. This means that schools are increasingly relying on Council's open space facilities to meet their gap in provision. This compromises the capacity of Council's existing open space to act as a resource for the broader community. If the proposed development were to be implemented, this could result in a significant loss of active open space for both students of Parramatta West Public School and potentially a reduction in	Refer to comment in response to point 9c above. The school does not propose to alter its existing arrangement with Council, which permits the use of Jones Park on Fridays for school sporting activities. Also refer to updated SIA included as Appendix G.

No	Submission Detail	Response
	availability of public recreation and sporting open space for the broader community.	
9ab	Council has already undertaken a detailed assessment of the carrying capacity of its sporting fields. This analysis showed that Jones Park and Ollie Webb Reserve, located close to Parramatta West Public School, are already defined as 'operating far above capacity' at current usage rates. Given this finding, these fields do not have any capacity to sustain an increased load of use generated by students from Parramatta West Public School.	It is unlikely that the changes to the school will alter how they currently use the sporting fields. The school has advised that they will not change the way they currently use Council's sporting fields with the increase in population. The playground area proposed is sufficient to deal with the increase in student numbers as shown in response to Point 9a above and in Appendix E – Drawing 2.
9ac	Council in its draft Social Infrastructure Strategy 2017, identifies its intention to play a more significant role in expanding access to open space for the community. The demand for open space will only grow as Parramatta's population profile, which is diverse and complex, continues to grow. The proposal conflicts with the principles of Council's draft Social Infrastructure Strategy which aims to secure community access to school fields as required to meet the increasing demand in the context of Council fields being at or above capacity. There are approximately ten public schools within City of Parramatta that have sports fields of varied sizes that have been identified as having potential to be made accessible to the broader community through joint and shared use arrangements.	Noted. The school does not intend to limit access to its playground area for community use. Any community use is required to be applied for through the school, as per the DoE policy.
9ad	If the trend of schools filling their open space with school buildings continues, no Australian school will provide sports fields for its students in future. This trend cannot continue without joined up, transparent, inter-governmental planning processes that will realise the adequate provision of active open space for school students in the context of City planning. Planning of school sites without adequate sporting and recreation space cannot continue in this way and will not support socially sustainable communities.	The playground area proposed is sufficient to deal with the increase in student numbers as shown in response to Point 9a above and in Appendix E – Drawing 2. The school has advised that they will not change the way they currently use Council's sporting fields with the increase in population.
9ae	Concerns relate to the current and future needs of students attending Parramatta West Public School and how their recreation and sporting requirements will be met into the future. Concerns also relate to the potential expectation of use of Council-owned public open spaces for schools (casual, temporary and/or permanent) which also have to serve the community. We note our	Noted – refer to comments above.

No	Submission Detail	Response
	community overall is under significant population growth and we have a significant diversity in needs to meet. Many of our sports fields are already at or operating over capacity. Council's fields closest to the school site being, Jones Park and Ollie Webb Reserve, are highly utilised by the local community and are currently operating far above capacity. Further information is required before comments can be finalised and recommendations can be made.	
9af	The SO Team ask that DOE respond to the following questions: 1. Please detail how the proposed development and planning principles meet the NSW Department of Education's own guidelines in the NSW Government Architects 'Design Guide for Schools' and the State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017 (Schedule 4). 2. Please detail how the recreation and sporting needs of the current and future school students at Parramatta West Public School will be met. 3. Please detail any expectations the school has about temporary, casual or permanent use of Council's open space parks and fields, being as specific as possible about hours of use, sites and types of use.	In response: 1. The open space proposed on-site would exceed the EFSG requirements and DoE therefore concludes appropriate space will be available on-site to meet student recreation needs. 2. There will be sufficient open space on the north and south sites to cater for informal sporting and physical educational activities. The need for outside facilities for formal activities will not increase beyond the school's current operational requirements (i.e. the frequency of use will not change). 3. The school currently has an agreement with Council for the use of Jones Reserve on a Friday and this is not proposed to change as a result of the proposal.
9ag	Ideally, any redesign of the Parramatta West Public School should to seek to retain the active recreation open space for use by the school students but also the growing local community through supportive shared use arrangements.	Noted, as outlined above, the proposal will ensure suitable areas are available to facilitate active recreation on-site. Further, the proposal will not alter the school's current arrangements for managing community uses on-site after school hours (i.e. formal requests will still need to be lodged with the school to facilitate out of hours use by the community).

Figure 9: Section of North Elevation



3.10 Public Submissions

Table 10: Public Submissions

No	Submission Detail	Response
10a	Concerns raised over the lack of consultation and engagement by the Department and local school as to the proposed development and design.	DoE, their project managers and project team have undertaken a number of consultation events and approaches. Seven (7) events were held at shopping centres and other locations prior to the application being submitted. These included the following: • Parramatta Library – 24 August and 26 October 2017; • Centenary Square Parramatta – 16 September, 18 November and 14 December 2017 and 17 January 2018; and • Stockland Merrylands – 23 May 2018. These events were publicised in the local newspaper and school website / newsletters. Other consultation formats included: • Advertisements in local newspapers; • Website information; • School newsletters; • Letterbox drop to local residents (as shown in Figure 10 below); • Information drop-in session at the school; and • Feedback forms. The information drop-in event held at the school was specifically notified to adjoining owners and local residents. Approximately 14 parents and residents attended the session and eight (8) feedback forms were received. The main issues that were raised in the pre-submission consultation included: • Traffic concerns for students in Railway and Crimea Streets; • Lack of air-conditioning in proposed building; • Concern about play and open space during and after construction and removal of the existing demountable buildings; • Safety fencing for children; • Privacy of residents and noise / acoustic impacts; • Height and over shadowing of adjoining properties;

No	Submission Detail	Response
		• Retention of trees and vegetation on the site; and • Ensure there are environmental aspects to the development. Details of consultation prior to application were included in the consultation report with the EIS. Based on the feedback received during design development and following the exhibition of the proposal, the following changes have been made: • Traffic was considered through the TIA; • Air-conditioning is now proposed; • Adequate play space has now been shown to be provided following construction and during construction student breaks may need to be staggered; • Additional fencing has been proposed; • As many trees were retained as possible; • Windows were angled to reduce noise and provide privacy; and • ESD principles were included in the design.
10b	Proposed multi storey building location overlooks the only residential properties adjoining the school. This is unfair.	The north site is required to be redeveloped to respond to significant projected growth within the Parramatta Centre primary school cluster, and to provide contemporary classrooms and associated facilities for students. Further, the buildings have been sited to ensure: • Student accommodation is located outside the existing overland flow path along the western boundary of the north site to ensure student safety is not compromised during a probable maximum flood (PMF) event; • Suitable access points are provided to the existing school buildings on the south site; and • Play space is provided to students on each side of Railway Street. Following exhibition of the proposal, DoE further refined the design of the buildings on the north site to ensure the windows on the five home bases on level 01 adjacent to the eastern boundary are amended to increase privacy (in addition to the existing angled orientation) to mitigate potential privacy and noise impacts. The

No	Submission Detail	Response
		options for these privacy measures are being considered and may include fixed frosted glass, translucent film or similar, one example has been outlined in greater detail in Appendix E – Drawing 1. In addition, as outlined in the EIS, the buildings on the north site are proposed to be setback a minimum of 7.08 m from the eastern site boundary to provide an appropriate transition between the single and two-storey developments adjoining the school site, addressing potential privacy impacts, and maximising solar access for the adjoining residential premises. .
10c	Proposed building locations will result in amenity impacts for neighbouring properties. Queries raised as to why the buildings could not be positioned on other parts of the available space. Could have been more adequately designed.	As detailed in the responses above, the building has been located a sufficient distance from the boundary to reduce the potential for overlooking and overshadowing. The new building will also act as a buffer between residences and the proposed playground area to reduce noise levels.
10d	There will be a 10-11m wall overlooking the boundaries of the residential properties.	The Holroyd Local Environmental Plan (LEP) 2013 applies to the site and a height limit of 9m is applicable. There is a minor variation in building height, however this is toward the centre of the building group and will not impact on adjoining properties in terms of overshadowing. It should be noted that a residential building of a similar scale could be closer to the boundary and would potentially have greater impacts. As stated in the response to point 9o above, the proposal meets the objectives of the height of buildings clause on the basis that: • There are no adverse visual impacts of the proposal on the school, streetscape or amenity of the area; • The proposal complies with the minimum solar access requirements outlined in the Holroyd Development Control Plan 2013; • The design of the building adjoining neighbouring properties includes architectural and landscaping elements to reduce the potential for adverse privacy impacts; • The height of the building will present an attractive architectural element to the school and surrounds; • The proposal has been designed with the slope of the site and this is one of the reasons for the relatively minor height

No	Submission Detail	Response
		variation and the differences in height variation across the building footprint; • The height will reduce the hard stand footprint of the building and thereby increasing the availability of outdoor play and learning areas; and • It is an important expansion of public infrastructure which is consistent with surrounding landform, scale and intensity.
10e	The building will lead to significant overshadowing of properties, particularly in Winter when the sun is lower. Appendix D11 appears to indicate that the overshadowing by 3PM will cover approximately 50% of the rear yards/ lawn areas of at least the properties located at 53-59A Franklin Street by 3pm. The plans do not indicate that the shadows are representative of the winter solstice and therefore the shadows could be larger.	These shadow diagrams identify the shadows cast by the proposed development at winter solstice, which occurs on 21 June. Whilst development control plans do not apply to the assessment of State significant development applications, DoE notes the Holroyd Development Control Plan 2013 recommends new developments demonstrate a minimum of 3 hours of solar access is retained at one main living area within an existing residential development between 9am and 4pm during the winter solstice. The shadow diagrams for the proposal demonstrate more than three hours of solar access will be provided to the seven residential premises along the eastern boundary of the site at the winter solstice (i.e. solar access will be retained between 9 am and up to 3 pm). Given the above, DoE has concluded the proposal would not generate any unacceptable overshadowing impacts.
10f	The arborist report does not comment on the impact of the proposed development to existing trees, shrubs or gardens on those adjoining properties with the exception of 'Tree 54', which has a major impact. The loss of light to these gardens could also have impacts on the trees and vegetation.	The Arborist Report identifies trees potentially affected by construction works, as defined in AS4970-2009. Tree 54 was identified as requiring tree protection measures as the proposed swale encroaches into the tree protection zone by 12%. Detailed protection measures for Tree 54 will be included in the final site/construction management plan to be prepared by the Head Contractor. No other trees on adjoining sites were identified as being impacted by construction works. In addition, DoE notes the shadow diagrams prepared for the proposal demonstrate more than 3 hours of solar access will be retained on-site, as per the recommendations of the Holroyd DCP 2013. Accordingly, DoE has concluded sufficient light will be available to support tree growth during winter solstice.

No	Submission Detail	Response
10g	The visual aspect of an imposing building overlooking the properties will lead to a loss of outlook, such as sunsets to the west. A repositioning of the proposal could lessen the impact.	The impacts on views from the rear yards of the residences along Franklin Street have been assessed in an amended View Assessment (see Appendix C). The View Assessment has been prepared using the Planning Principles identified in <i>Tenacity Consulting v Warringah Council</i> [2004] NSWLEC 140 at 25-29. The amended assessment generally concluded: • The adjoining premises on Franklin Street are considered to comprise filtered local views of an existing school playing field and Council reserve beyond. • With the exception of one two storey dwelling, the remaining dwellings are single storey and views would only be obtained from the rear of these properties. Due to the location of existing 2 m high fences and other ancillary structures, views from the rear of these properties would currently comprise views of trees with sky beyond. Whilst these views would be pleasant, they are not iconic. • The proposed development has the potential to impact views from eye level to sky level, which predominantly comprise views of vegetation. These views would be impacted by the proposed building as filtered views. • Views from windows on the upper level of the two storey dwelling may comprise views to open space, however these would be filtered through the tree canopy. Whilst these views are pleasant, they are not iconic. These views would be impacted by the proposed building as filtered views. The visual impacts of the proposal at the adjoining residential premises on Franklin Street are considered reasonable on the basis the proposal complies with the height limit at the boundary, includes at least a setback of over 7m and includes additional landscaping on the boundary to retain landscaped views at the affected properties. Further, the proposed development would result in an improved outcome in comparison to a standard residential development permitted in the zone on the basis that residential developments are permitted 900mm from the boundary and could result in more significant view loss.

No	Submission Detail	Response
		Further details of the assessment have been included in Appendix C.
10h	There are windows in the eastern side of the structure which will have an elevated position and overlook the properties. The diagrammatical screens displayed within the redevelopment application are insufficient to indicate whether privacy will be protected. Primary concern is privacy.	The windows are angled to protect privacy and in addition options for increased privacy on the window glazing are being considered. Refer to Appendix E – Drawing 1 which shows an example of what is being considered.
10i	The residential houses of 49 & 51 Franklin St have renovated and open plan entertaining areas to the rear structure of the yards. Accordingly, the entire yard and significant portion of the rear houses (i.e. kitchen, dining and living area) will be viewed from the proposed structures.	As detailed in response to Point 10h, there will be no views from the proposed home bases to the rear yards of the adjoining properties due to the use of angled windows and glazing changes.
10j	There does not appear to be consideration for such loss of privacy in the current proposals. Furthermore, the elevated position will reveal the content of the yards and access points to the rear of the house, currently screened. I have concerns with respect to security to the properties and contents given the elevated positions.	Refer to comments above. The privacy of the residents was considered and that is why the windows were angled and additional plantings proposed. Further glazing changes are proposed on the upper floor windows to ensure privacy and security of adjoining properties is maintained.
10k	The proposed structure appears to encompass a hall/multi-purpose building closest to the residential blocks. The Wood & Grieve Engineers report at table 19.1 indicates that the decibel range will increase over and above the recommended noise level to the North aspect only. The report does not appear to take any consideration of increased traffic (foot and vehicle) during, before or after school.	The proposed hall will be situated to the west of the classroom building, which provides an acoustic barrier from the hall to the residences to the east. Section 5 of the acoustic report presents the operational noise assessment providing predicted noise levels and proposes operational restrictions on the use of the Hall and community use as well as recommended management protocols to ensure the operation meets the EPA noise criteria. These include: • The hall should not be operated beyond 10pm (earlier for concerts – see below). • No use of amplified music under communal operation. • Concerts should be restricted to daytime and no later than 6.00pm. • Under concert operation the hall must be fully closed and noise level controlled to ensure compliance.

No	Submission Detail	Response
		- The façade of the hall should be designed based on the glazing and construction included in the report, this would be relevant for the detailed design phase. - Ensure occupants / users enter and leave the premises quietly. Refer to the updated report in Appendix D.
10l	The current development drawings appear to have the roof structure angled down and toward our properties. I note that during excessive rain, the back part of the yards of the residential units become quite heavy with water. There appears to be no consideration given for further excesses of water from the proposed building onto adjoining properties. I am also concerned that this may lead to further drainage issues and water log existing gardens and trees.	The roof is angled down towards the residential properties to the east to reduce the impact of height and overshadowing in this location. The roof will have appropriate gutters and drainage to ensure that no additional water will impact the adjoining properties.
10m	We note that we have serious concerns as to traffic management and safety during school pick up and drop off times. We have observed that presently on Franklin St, traffic is very heavy during these times and sometimes erratic, including: - Double parking; - Parking in residential driveways/ blocking driveways; - Unsafe crossing by pedestrians. I have concerns that the increased number of students will exacerbate the current situation. I also note that the proposed development be re-positioned further to the west of the current proposed site (i.e. closer to the ambulance station), that it would likely encourage school drop offs further to the west. This combined with the proposed no-parking may alleviate some of the concerns raised in this objection.	There is extensive kerb space available at drop-off and pick-up times on streets surrounding the school. Formal zones are proposed for the higher turnover activity to improve on street operations. Parents will be encouraged not to wait in the traffic lanes but proceed to the nearest available kerbside space.
10n	My review of the proposed redevelopment application did not reveal any comment on the potential risk of vibration damage due to earth moving and construction equipment to the residential buildings. We note that the residential dwellings, in some instances have been renovated on older style buildings and foundations. There appears to be little to no consideration given as to the likely impact of vibration to foundations.	A Noise and Vibration Assessment was included in Appendix U of the EIS and has been amended and included in Appendix D of this document. Please note none of the amendments related to vibration during construction. The recommendations relating to vibration impacts during construction include: Preparation of a Construction Noise Vibration Management Plan prior to construction commencing to ensure high level

No	Submission Detail	Response
		predictions can be used to avoid non-compliances with the relevant vibration criteria. Equipment selection should be based on the vibration safe working distances outlined in the report. It should be noted that if the vibration intensive equipment must be used within the safe working distance, attended vibration measurements must first be conducted to assess the potential impact from the equipment. Details will be included in the final site / construction management plan and other supporting documentation which are currently being developed by the Head Contractor in consultation with DoE and other relevant stakeholders. The Head Contractor will also be required to undertake a pre-construction photographic dilapidation survey of existing infrastructure and structures.
10o	I would like to express the view that I am dissatisfied with the current proposal in terms of its design and in particular, location. I see no reason why similar planning could be accommodated on either of the existing three boundaries of the school. Indeed, if the planning structure was to be inversed and constructed on the western side of the oval, the building would then overlook Burra Reserve without the existing complaints. It would appear that no residential blocks would be prejudiced from such a move. Furthermore, with the introduction of changes to pedestrian crossings, the flow of the school could be maintained in the alternate position,	There were a number of options considered in the location of the new building on the school site. This was considered the best location for access to the school and provision of appropriate open space on both campuses. Currently the open space area on the north site is used as a playground, potentially if the building located on the west or south site the noise and impact on the adjoining owners would substantially increase. The location to the east provides a buffer to the residents in terms of playground noise and is also located out of the overland flow path that currently impacts both the western play area and Burra Reserve. The overland flow and potential flooding make the site unsuitable for building and potentially unsafe for children.
10p	I would encourage the department to engage with the residents so that our view can be expressed in an open forum.	The consultation undertaken was completed in accordance with the DPIE requirements for the SSD. In addition, further consultation was undertaken by DoE since the beginning of the design phase. Refer to response included to Point 10a and consultation report included with original application. At this stage no additional consultation is proposed by the DoE.

No	Submission Detail	Response
10q	The objector is disappointed that building heights are allowed to exceed the planning control limits, especially along Crimea St where the houses are situated lower already due to the natural ground level difference. The objector enquires as to whether the entire development can be lowered or the roofline lowered to maintain the building height limits.	There is only a minor variation to the building height in the centre of the proposed development. Along Crimea Street the variation is only minor as shown in Figure 9 above. If the proposal has been considered as complying development the height could have been considerably higher, up to 12-15m.
10r	The construction hours on a Saturday are not consistent with standard practice which is Saturday 8am to 1pm. The objector requests amendments to the construction hours to no later than 1pm.	Noted and agreed to reduce the construction hours. Details will be included in the final site / construction management plan and other supporting documentation which are currently being developed by the Head Contractor in consultation with DoE and other relevant stakeholders.
10s	The location of this new structure will overlook the residents, myself included and significantly infringe on our privacy and contribute to noise disturbance to the residents. The objector would propose the location of the new site be moved to the opposite side of the playground, where there are no residents impacted and no changes to the drop off/pick up locations.	As stated above, the proposed development complies with noise provisions as detailed in the acoustic report (subject to mitigation measures for the hall as detailed in response to Point 10k above) and would reduce the noise currently experienced by the neighbours who adjoin the play spaces. In terms of privacy, the windows are angled to reduce overlooking and changes to the glazing is also proposed. Parramatta Council has recently installed two short drop-off /pick-up school zones. Additional zones are proposed at the school frontages for the expanded school to improve traffic operations. There will still be abundant uncontrolled car parking for resident visitor use. Refer to revised TIA in Appendix K.
10t	The objector would expect to see any windows overlooking the residents on Franklin Street moved to the opposite side to respect the resident's privacy. At a minimum they would expect frosting on any windows facing the residents on Franklin Street to allow light into the structure but restrict viewing into the resident's dwellings and yards. The objector would also expect privacy by way of trees or other structures to be added to the proposed works to block any views in.	As previously stated, windows are angled and glazing changes are proposed to ensure adjoining owners privacy is maintained. Further, additional trees are proposed along the boundary to assist with maintaining the vegetated outlook from the dwellings. Refer to Appendix E – Drawing 1.

Figure 10: Extract of Consultation Outcomes Report – Letter Box Drop Plan (Source: Barker Ryan Stewart)



Reference Point 10a

Appendix A – Aboriginal Cultural Heritage Assessment Report

Provided under separate cover

Appendix B – Analysis of Feasible Alternative Options

Provided under separate cover

Appendix C – Amended View Assessment

Provided under separate cover

Appendix D – Amended Noise and Vibration Impact Assessment

Provided under separate cover

Appendix E – Additional Diagrams

Provided under separate cover

Appendix F – Historical Archaeological Assessment

Provided under separate cover

Appendix G – Amended Social Impact Assessment

Provided under separate cover

Appendix H – Updated Architectural / Development Plan Set

Provided under separate cover

Appendix I – Amended CPTED Report

Provided under separate cover

Appendix J – Amended Landscape Plans

Provided under separate cover

Appendix K – Amended Transport Assessment

Provided under separate cover

Appendix L – Waste Docket

Provided under separate cover

Appendix M – Asbestos Register

Provided under separate cover

Appendix N – Interim Audit Advice

Provided under separate cover