

Paulina Wythes
Director, Social and Diverse Housing Assessments
Department of Planning, Housing and Infrastructure
4 Parramatta Square
12 Darcy Street
Parramatta NSW 2124
Lucinda.craig@dpie.nsw.gov.au

Re: SSD-79439459 – 1 Barrack Lane and 81 – 83 George Street, Parramatta – Build-to-Rent Development

Dear Lucinda,

The Department of Education (the department) welcomes the opportunity to provide comments on the above proposed State Significant Development Application (SSDA).

The department understands that the SSDA seeks development consent for a Build-to-Rent Development comprising:

- Demolition of existing structures, vegetation removal, site preparation and earthworks;
- Construction and operation of a 40-storey shop top housing development comprising a:
 - 37-storey residential tower containing 618 build-to-rent housing units;
 - 3-storey podium with ground level retail floor space, lobby facilities, and back-of-house areas and two levels of above ground car parking for 71 spaces;
- Construction of a new substation and infrastructure connections.

The site adjoins Arthur Phillip High School to the immediate south, which has two local heritage item listings (I585 – Convict Barracks Wall and I587 – Arthur Phillip High School and potential archaeological site) under Schedule 5 of the Parramatta LEP 2023 (see **Figure 1**).

The high school campus is split across Macquarie Street with the main 10-storey building located on the north side and majority of sports fields / courts on the southern side which the school shares with neighbouring Parramatta Public School.



Figure 1: Location of the subject site in relation to adjacent school and heritage items (subject site shown in yellow)

Accordingly, the department has reviewed the SSDA documentation considering the potential environmental and operational impacts to the nearby schools. Successful operation of the schools relies on safe pedestrian, cyclist and vehicle access and minimal noise and vibration interference. As such, consideration and incorporation of the matters below will assist to limit and manage any impacts to the schools and students.

Heritage and Visual Impact

The proposal adjoins the local heritage item I585 'Convict Barracks Wall' along its southern boundary. This heritage item and its curtilage is partially located on the site of Arthur Phillip High School and is also listed on the department's s170 Heritage and Conservation Register (ID 5065676).

The Environmental Impact Statement (EIS), and its specialist study appendices (notably, the Historical Archaeological Impact Statement (prepared by Urbis, October 2025)), failed to identify that Arthur Phillip High School Building B is also listed on the city of Parramatta Local Environmental Plan 2023 (PLEP) (Arthur Phillip High School and potential archaeological site <https://www.hms.heritage.nsw.gov.au/App/Item/ViewItem?itemId=2240360> and Parramatta Public

School – Building A and Archaeological Remains

(<https://www.hms.heritage.nsw.gov.au/App/Item/ViewItem?itemId=5067959>), and is also listed on the department's s170 Heritage Conservation Register directly adjacent to the proposed development. Consequently, the EIS has failed to provide a complete assessment of environmental impacts in accordance with the requirements of the Secretary's Environmental Assessment Requirements (SEARs) issued for the project.

The Heritage Impact Assessment (prepared by Urbis, October 2025) has not acknowledged key heritage items impacted in the vicinity including Arthur Phillip High School (LEP I587), and the department's s170 heritage register, and Parramatta Public School listed on the department's s170 Heritage register. These items sit within a historic precinct which extends to the Parramatta Railway line and station and also includes Local Heritage Item 645 – The Lancer Barracks group, which includes the State significant 1st/15th Royal NSW Lancers Memorial Museum Collection (State Heritage Inventory 01824). Impacts to these multiple heritage items have not considered the out-of-proportion development in the context of its built environment, and consequently, have not assessed visual impacts to all of these items.

The department notes that the subject proposal has sought to mitigate impacts to the convict barracks wall and provides a setback of 3m to allow for the maintenance and interpretation of the wall. However, the Heritage Impact Assessment and the proposal project does not include any provisions for the protection or conservation of the convict wall during construction works. It is unlikely that a 3m exclusion zone during construction will be sufficient to protect this wall without substantial controls.

The department requests that the following heritage impacts be accurately assessed and EIS and the design amended as required as follows:

- Include the adjacent listed items of Arthur Phillip High School (Item 587), Parramatta Public school (department's s170 Register), and the Lancer Barracks (Item 645) in the heritage assessment and reference to impacted items in the vicinity.
- Include an assessment of the visual and setting impacts of the proposed development on the heritage items to the south of the tower including Arthur Phillip High School (items 585, and 587) and Parramatta Public School (department's s170 Register).
- Include an adequate assessment of the visual impact of the increased height on key heritage views of the school from the Railway Station (East) across the Lancer Barracks and school sites.
- Include an assessment and demonstrate acceptable impacts to the open space area for Arthur Phillip High School and Parramatta Public School from overshadowing through winter during school hours. Impacts to the Lancer Barracks site to the south of the school should also be addressed, particularly given it is listed for solar protection in the Parramatta Development Control Plan 2023 (PDCP) and will also be impacted by the shadowing.
- Inclusion in the Heritage Impact Statement and proposal of measures to conserve and protect the shared heritage item of the Convict Barracks wall. A 3m setback for the development will enable future access to the wall but does not address the construction impacts of such major works on the wall, and it is considered that the impact statement did not provide adequate controls for construction works to preserve it in its current condition. As the convict wall represents the boundary between the department's property and the proposed development, impacts to this heritage significant structure would also have

operational impacts to the boundary of the school; a 3m exclusion zone is completely inadequate to prevent these impacts.

- The heritage and planning assessments for the proposal should include an assessment of impact of the increased height of the building outside the generally higher rise CBD areas, and any precedent setting or cumulative impact for proposed future developments, on the lower rise and heritage rich precincts to the south and east of the site, incorporating the two School heritage sites.

Privacy and Overlooking

Whilst there is some setback provided from the school boundary to the proposed building at podium level, overlooking from this point along the southern boundary out over the school should be considered.

The units with windows on the southern façade of the building provide direct views over the school grounds where children play. Consideration should be given to protecting the privacy and safety of the school community through the introduction of privacy screening. The horizontal glass louvres indicated on the southern façade of the proposed wintergardens should be opaque and fixed at an angle so as to screen views directly over the school playground.

Overshadowing

The department notes that while the proposal increases the existing building height onsite from a part 2 / part 3 storey building to a 37-storey building, the additional bulk and scale directly north of the school site is a result of the uplift in floor space ratio (FSR) sought. The maximum height of the building complies with the maximum height limit and solar access protection plane under the PLEP. However, the proposal seeks to utilise FSR incentives under Clause 7.15 (which provides an FSR bonus of up to 15%) and Clause 7.25 (which provides a 5% FSR bonus). It is difficult to ascertain from the shadow diagrams whether the additional overshadowing to the immediate south of the subject site at 10am and 11am directly impacts the outdoor play area of Arthur Phillip High School. Given the area to the immediate south already experiences extensive overshadowing during winter, more detailed analysis is required with regard to the exact impacts on the outdoor play area of Arthur Phillip High School and whether the uplift in FSR is a contributing factor.

Operational Traffic

Barrack Lane provides one way access travelling north to south. It provides the only egress point from the staff car park for Arthur Philip High School, including truck and service deliveries. This egress point is located immediately south of the carpark entry for the proposed building. Barrack Lane also facilitates a pedestrian entry point into the school.

Representations received from Arthur Phillip High School, highlights the need to carefully consider the future access arrangements for the proposal, including traffic congestion and volume along Barrack Lane. This should include potential impacts to pedestrians and safety along Barrack Lane during the school's peak drop-off and pick-up times.

The following improvement works should be considered to mitigate traffic impacts:

- stop / give way signage at the intersection of the school carpark egress point
- a pedestrian crossing across Barrack Lane in front of the pedestrian access point to the school

- waste collection and service vehicle operations should avoid peak school periods given access will be entry into Barrack Lane and exit along Barrack Lane past the school.

Construction

Construction Environment Management Plan (CEMP)

It is requested that any CEMP required to be prepared for the development includes an obligation on the developer to consult with Arthur Phillip High School during its preparation. This is to allow consideration of additional measures to be implemented during critical education periods such as sitting of HSC exams, planned school events, and the like.

Additional matters to be addressed in the CEMP include:

- Identification of Arthur Phillip Public School and Parramatta Public School as a high-priority sensitive receiver.
- Ensuring emergency access to the school remains unobstructed at all times.
- Providing the school with a minimum of seven days' advance notice for all high-impact works (including demolition, excavation and concrete pours).
- Establishing a clear and direct communication protocol between contractors and school leadership, including rapid-response arrangements.
- Maintaining regular engagement with both the school and the Parents and Carers Committee throughout the construction period.
- Adequate prevention and management of environmental hazards such as dust and debris (which impacts the health needs of staff and students with asthma) and potential damage to cars in the adjacent staff parking lot.

Traffic

- If approved, it is recommended the proposal be conditioned so construction and delivery vehicles do not access Barrack Lane during school drop-off and pick-up times (30 minutes before and after school start and finish times) to minimise vehicle conflict with students, parents and staff accessing the school and egress after school finish.
- A heavy-vehicle exclusion zone should be implemented along the school frontage on Barrack Lane for the duration of construction to minimise road safety risks.
- If any impacts to school bus services or temporary road closures are anticipated, these should be addressed and mitigated through the CEMP in consultation with Arthur Phillip High School.

Noise and Vibration

- Noise and vibration assessments are to assess construction noise impacts and consider the school as a sensitive receiver.
- If noise and vibration exceedances at the school are identified, mitigation measures should be developed consistent with NSW EPA construction noise guidelines. The mitigation measures should seek to maintain internal noise levels for classrooms required by the department's Educational Facilities Standards and Guidelines (EFSG).
- Real-time noise and vibration monitoring should be installed along the school boundary during demolition and excavation works.
- Where necessary, respite periods should be provided during the school day to limit impacts to student learning. Consideration should also be given to potential wellbeing impacts, particularly for younger students who may experience anxiety or sensory overload in response to prolonged construction noise.

Air Quality

- Consideration should be given to air quality impacts arising from construction dust and activities in a manner that prevents impacts to the school.

Waste, Odour and Service Vehicles

- Noise, odour and safety impacts from construction vehicles, garbage trucks and servicing movements should be appropriately managed to minimise disruption to the school.

Should you require further information, please contact the department's Statutory Planning team at StatutoryPlanning@det.nsw.edu.au.

Sincerely,

A handwritten signature in black ink, appearing to read 'J. Maslen', with a stylized flourish at the end.

Jason Maslen

A/Director, Statutory Planning