

5th June 2017

The Secretary
NSW Dept. of Planning & Environment
GPO Box 39
SYDNEY NSW 2001

Dear Ms McNally,

Public Exhibition of Proposed Development – SSD 16_7968 – New Oran Park High School & Primary School Expansion

Thank you for the opportunity to make submissions as part of the public consultation process. As you may be aware Greenfields Development Company No. 2 Pty Ltd ('GDC2') is the developer of Oran Park Town. GDC2 has reviewed the plans and supporting documentation available on the Department's website. In summary, GDC2 considers the proposed high school and primary school expansion to be a well-designed proposal which will complement Oran Park Town through both its built form and as a valued ongoing community asset. We do, however, have concerns in respect to the adequacy of off-street car parking proposed.

Below is a brief outline of the Secretary's requirements as they relate to on-site parking, the proposal's response, GDC2's submissions and its suggested approach to off-street parking provision.

Environmental Impact Statement ('EIS') requirements

The Secretary's Environmental Assessment Requirements issued on 14 October 2016 requires, amongst other matters, the following to be included and addressed by the EIS for the proposal:

"details of the proposed number of car parking spaces and compliance with appropriate parking codes and justify the level of car parking provided on-site"

EIS response

Section 6.4.3 of the EIS and the Traffic Report by Woolacotts consulting engineers at Appendix 16 respond to this requirement. Below is a summary of the EIS response:

- The proposal will provide 10 onsite car parking spaces for the high school, resulting in a total of 56 onsite parking spaces between Oran Park Public School and Oran Park High School. The 10 spaces will be reserved for staff or official visitors. No additional onsite parking will be provided for Oran Park Public school.
- The State and Regional Development SEPP (clause 11) excludes the application of the otherwise relevant car parking code i.e. Camden DCP 2011.

- The RMS Guide to Traffic Generating Development does not set out specific considerations for parking or traffic associated with an educational establishment, the nature and details of other similar approved developments must be examined.
- The proposed onsite parking provision is:
 - In line with Department of Education Guidelines to encourage and promote sustainable transport measures, such as encouraging the use of public transport and cycling to get to school.
 - In accordance with recent government school developments.

Greenfields submission

Traffic movement estimates adopted by the EIS (Appendix 16, section 3.6) for the purposes of traffic generation and modal split assessment are as follows:

- 90% of staff driving their own vehicles to work, i.e. 36 public school and 127 high school staff.
- 20% of Year 12 students driving to school, resulting in 60 vehicles travelling to the school.

GDC2 understands that the purpose of the above is principally to examine and assess traffic generation rather than parking. It also noted that the above does not factor in car-pooling, one of the recommended 'green travel plan' strategies for the proposal. Nonetheless, the estimates strongly support a position that:

- Despite best efforts to encourage and promote sustainable measures, the amount of onsite car parking proposed will be insufficient to accommodate staff and student parking demand. Without considering students, onsite parking provision equates to 1 space for every 3.5 staff, adopting 90% of staff driving their own vehicles to work.
- In the absence of any alternative measures, this parking demand would have to be met by on-street parking in the surrounding residential road network. This impact will be heightened by planned medium density housing precincts immediately south of the school site. Whilst the NSW Government is planning for passenger rail transport to be available in the future at Oran Park Town, it will be some time until this transport service becomes available.

GDC2 believes that the extent of off-site parking resulting from the proposal is not a desirable outcome and is not consistent with the expectations of Oran Park Town residents that new developments in 'greenfield' locations limit their off-site impacts.

After reviewing the proposed plans and having regard to the school site's local context, Greenfields believes there are options which can and should be explored to improve the amount of off-street parking that can service the proposal. As a minimum, this should be undertaken to address the likely demand for staff car parking, taking into account the estimates of staff traffic movements and achievable car pooling as per the proposed 'green travel plan'. These options include:

- Additional onsite parking. There would appear to be spare onsite land capacity to expand the existing and proposed car parking areas.
- Exploring the opportunity to make use of / expand on existing off-street parking facilities at Jack Brabham Reserve, subject to appropriate arrangements with Camden Council.

Greenfields recognises the importance of keeping issues, such as onsite parking provision, in perspective in the overall planning assessment. It is one of the many issues that needs to be considered in determining development proposals and that in some circumstances it may be appropriate to contemplate a reduced level of onsite parking where the other benefits of the proposal are significant. We recognise that with other recent government school developments a lack of spare land capacity may limit or eliminate the opportunity to provide additional onsite parking – we do not believe this to be the case here.

Whilst the Department is to be congratulated for proposing an otherwise well designed, long term community asset and promoting sustainable transport measures, we believe it would be in the interests of both the project and the Oran Park Town community to provide additional off-street parking facilities.

Thank you for considering this submission. If there are any questions or should Council wish to discuss our submission, please contact our Development Manager, Paul Hume, by either telephone (9043 7515 or 0408 110 899) or by email paul.hume@greenfields.net.au.

Yours sincerely,



Mick Owens
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