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Your Ref SSD-9579147

Our Ref NCA/9/2020

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ATTN: Nick Hearfield,

COUNCIL SUBMISSION

NOTICE OF EXHIBITION OF ENVIRONMENTAL IMPACT STATEMENT FOR THE REDEVELOPMENT OF PENDLE HILL HIGH SCHOOL (66 BINALONG ROAD, TOONGABBIE)

I refer to the above application and the request to provide advice on the proponent's *Environmental Impact Statement*. Council has reviewed the supplied Environmental Impact Statement and wish to make the following comments:

Open Space

The Social Impact Assessment recognises the reduced opportunities for sport and recreation within the school site and the increased demand for recreational facilities facilitated by higher student numbers, which will likely result in cumulative impacts to nearby Council facilities through higher levels of use. It also acknowledges that the remaining playing field lacks facilities required for wider community access, such as toilets and changerooms. To address these impacts, it recommends that the quality of the remaining open space within the site be improved to increase capacity, through the following:

1. Providing adequate shading over paved passive areas to ensure these spaces are used during hot days.

Considering issues such as urban heat and increasing intensity and duration of hot days as a product of a changing climate, adapting paved areas to have excellent thermal comfort will ensure greater use throughout the year. This may include shading trees, landscaping and/or shade sails.

2. Providing adequate shading over hardcourts to ensure these spaces are used during hot days.

As identified in the previous recommendation, increasing the thermal comfort of these spaces can assist in future-proofing recreational facilities at Pendle Hill High School.

3. Activating other open spaces within the school grounds.

A key strength of Pendle Hill High School is the large amount of open space on site. Investment and embellishment of previously less 'used' areas of open space can increase these spaces ability to perform at a higher standard.

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4. Embellishment of existing hardcourts

To ensure they have desired recreation spaces that perform at a suitable standard.

These recommendations are considered critical and should be implemented to ensure superior amenity and enhanced usage by the increased student population. At the same time, these recommendations help minimise any potential cumulative impacts of increased demand on nearby Council facilities which have limited capacity in serving the community at large.

Noxious Weeds

The Arboricultural Impact Assessment identifies tree species (*Ligustrum spp.* and *Ailanthus altissima*) that are identified as priority weeds in the Greater Sydney Regional Strategic Weed Management Plan (2017-2022). The applicant has a biosecurity duty under the *Biosecurity Act 2015* to remove any priority weeds, which should be replaced with indigenous plant species to maintain canopy cover consistent with Council targets.

Council's Open Space Team recommends:

- *All trees declared as 'priority weeds' in the Greater Sydney Regional Strategic Weed Management Plan 2017 to 2022 are to be removed and replaced with appropriate indigenous species to comply with the Biosecurity Act 2015 duties and maintain tree canopy.*
- *Amended landscape plans to include embellishment of open space and recreational facilities that adequately demonstrate an increased capacity to meet the physical activity needs of an expanded student population, including:*
 - *Activation and embellishment of 'less used' open space areas*
 - *Natural and artificial shading of passive paved areas and hardcourts*
 - *Upgrade of existing hardcourts and playing field*

Social Outcomes

Council's Social Outcomes team has reviewed the SIA submitted with the application and would like to raise the following:

- Section 1.4 of the SIA states Pendle Hill High School Catchment will have a projected shortfall of 2,711 student places by 2036. Elton also notes that the "The GSC's Central District Plan acknowledges these challenges and proposes two guiding principles to assist with community infrastructure delivery – land use efficiency and joint and shared use. Specifically, the GSC states that future school planning will need to focus on efficient land use regarding school sites." It is not stated where the additional places in the Pendle Hill High School Catchment will be provided. Council Officers wish to ensure that short term planning does not result in the use of demountables to meet the long-term needs of students.
- Section 7 provides a thorough assessment of impacts. Council notes that by 2036 there will be a projected shortfall of 2,711 student places in the Pendle Hill High School Catchment Area, yet this development is only to accommodate 1,320 students. Once the student number is increased to 1,320 the square metres of open space will decrease from 51sqm/student to 18sqm/student. Page 10, and The NSW Department of Education's Planning Guidelines for Schools (Draft) 2020 states that 10sqm of open space per student is the minimum. Therefore, the maximum student population with current open space provision (23,000sqm) at Pendle Hill High School is 2,300. Research commissioned by the Northern Sydney Local Health District has identified that 25sqm should be the benchmark free play space per student when planning and designing schools and ensure loose play equipment is available and that the probability of students meeting physical activity recommendations increased sharply between 15 and 25sqm per student (Anne Grunseit, Blythe O'Hara, Bradley Drayton, Vincent Learnihan, Louise L Hardy, Eve Clark, Paul Klarenaar, Lina Engelen <https://bmjopen.bmj.com/content/10/6/e034586>).

Council Officers are concerned that demountables are and will be used more to meet the gap in school places following the completion of the upgrade, reducing the open space below 15sqm per student, thus limiting the probably of students meeting physical activity requirements and increasing reliance on Councils open space/sportsgrounds. This is particularly of relevance as all sportsgrounds in Catchment 1 (which includes Pendle Hill) are operating at capacity (17%) or above/far above capacity (83%). Council Officers recommend a condition of consent that demountables cannot reduce the open space per student below 15sqm, nor utilise Council sportsgrounds to meet the curriculum requirements for physical activity as a result.

- Page 67 of the SIA notes: *“The following two recommendations seek to highlight potential opportunities to ease local open space shortfall:*
 - 1. A share use agreement for playing field at Pendle Hill High School could provide out of school hours use to the broader community. Demand for open space and recreational facilities are traditionally highest outside of business hours and on the weekend.*
 - 2. A share use agreement for hardcourts at Pendle Hill High School could assist Parramatta Council to meet current and future provision rates for hardcourts across the LGA. Currently, there are four basketball courts and two tennis courts at Pendle Hill High School.”*

Council Officers recommend a condition of consent that Pendle Hill High School agree in principle to signing a lease agreement with Council to allow use of the sports field outside of school hours on weeknights, and on weekends. The School should also be included in the NSW Government’s Share our Space Program which opens the school grounds to the Public during the School Holidays.

This will also require a plan of management to be established as well as clear definition of secure and publicly accessible areas for after-hours community use to be included with the proposal.

Traffic and Transport

In summary, Traffic has very significant concerns regarding the under provision of on-site staff parking as there is a shortfall of 30 parking spaces.

Car Parking Rate

The existing school carpark has capacity of 67 parking spaces. After the school redevelopment, the carpark capacity will be reduced to 57 car parking spaces despite the number of staff increasing to 102. Based on a survey completed by staff at the school, the required parking rate was determined to be 0.85 parking spaces per staff. This will mean that the development has a shortfall of 30 car parking spaces.

Consideration is given to the fact that as part of the school redevelopment, there will be improvements made to both active transport and public transport facilities by implementing student safety measures and education for road safety, encouraging staff car-pooling and providing them with end of trip facilities for cyclists which will help reduce reliance on private vehicles by staff. However, these positive steps will not entirely address the car parking shortfall of 30 spaces.

It is noted that Cornock Avenue has a capacity of 36 car parking spaces. The shortfall of 30 car parking spaces from the redevelopment will result in this street reaching its on street parking capacity. This will unduly comprise residents’ reasonable expectations to utilise some on street parking as well as affect driver sight distances when residents leave their properties.

Increasing the demand for on-street parking is also likely to increase occurrences of illegal parking. Council therefore strongly recommends that the on-site car parking rate is increased to meet the 87 spaces required by the recent study to ensure residential amenity is maintained.

School Pick up and Drop off

The TIA proposed Kiss and Ride areas in the following locations:

- Binalong Road northbound – primary kiss & ride.
- Binalong Road southbound - North of pedestrian crossing.
- Burrabogee Road westbound - East of new pedestrian crossing.
- Burrabogee Road eastbound - West of Knox Street.
- Bungaree Road northbound - South of pedestrian crossing.
- Bungaree Road southbound - South of Cornock Avenue; and
- Favell Street westbound - Outside the existing pedestrian entry

It is noted that a Kiss and Ride location in Favell Street may not be required due to the low demand, however, the overall strategy is acceptable.

A sign and line marking plan will be required to be submitted to Council for review and approval by the Parramatta Traffic Committee. This is recommended to be conditioned. It is noted that further review of the Kiss and Ride arrangement can be done during the review of the signs and line marking plan.

Proposed Raised Pedestrian Crossings

Upgrade of the existing and new raised pedestrian crossings are proposed at the following locations:

- On Binalong Road north of the site.
- On Binalong Road south of the site.
- Burrabogee Road at Knox Street.
- Bungaree Road at Cornock Avenue

The TIA demonstrates that the above locations will meet Council's interim warrants for Raised Pedestrian crossings. Accordingly, the proposed works are supported.

Recommended Traffic Conditions:

As noted above, this proposed reduction in parking is not supported on Traffic grounds due to the impact it will have to the current local streets off-street parking. However, should the development be approved, the following traffic conditions are recommended to be included:

Prior to the issue of a Construction Certificate

Parking spaces are to be provided in accordance with the approved plans and with AS 2890.1, AS 2890.2 and AS 2890.6. A total of 87 parking spaces is to be provided with the spaces affected by the reduced aisle width within the northern most parking module to be marked as

Small	Car	Spaces.
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Reason: To comply with the Australian Standards.

The applicant is to submit a separate application for the proposed line marking and signage for the proposed Kiss and Ride spaces near the school as well as the modifications to the bus bay in Binalong Road to Council's Traffic and Transport Services for consideration by the Parramatta Traffic Committee under Delegated Authority for Council's approval. The construction of the approved treatment is to be carried out by the applicant and all costs

associated with the supply and construction of the works and appropriate signage are to be paid for by the applicant at no cost to Council.

Reason: To comply with Roads Act 1993.

Detailed engineering design plans of the proposed raised pedestrian crossings in the locations listed below are to be submitted to Council's Traffic and Transport Manager for consideration by the Parramatta Traffic Committee and approval by Council:

- Binalong Road at the northern side of the school
- Binalong Road at the southern side of the school
- Burrabogee Road near Knox Street
- Bungaree Road north of Cornock Avenue

The construction of the approved treatment is to be carried out by the applicant and all costs associated with the supply and construction of the traffic facility and appropriate signage are to be paid for by the applicant at no cost to Council.

Reason: To ensure maintenance of traffic flow and safety on the surrounding road network.

During Work

Occupation of any part of the footpath or road at or above (carrying out work, storage of building materials and the like) during construction of the development shall require a Road Occupancy Permit from Council. The applicant is to be required to submit an application for a Road Occupancy Permit through Council's Traffic and Transport Services, prior to carrying out the construction/restoration works.

Reason: To ensure proper management of Council assets.

Oversize vehicles using local roads require Council's approval. The applicant is to be required to submit an application for an Oversize Vehicle Access Permit through Council's Traffic and Transport Services, prior to driving through local roads within Parramatta LGA.

Reason: To ensure maintenance of Council's assets.

The Use of the Site

One year from the issue of the Occupation Certificate, and every year for 2 years thereafter, the applicant shall submit to the satisfaction of Council's Manager Development & Traffic Services a review report on the effectiveness of the Green Travel Plan. The reviews shall include surveys of modal share and vehicle trip generation for the various land uses within the development during peak and off-peak periods. The review shall also include any recommendations for improving the effectiveness of the plan. Any recommendations made to improve the effectiveness of the plan shall be incorporated into an updated Green Travel Plan.

Reason: To ensure the effective management of the Green Travel Plan.

Urban Design

A. SEAR's requirements

The SEARs require the proposed development to address the following Built Form and Urban Design considerations:

the height, density, bulk and scale, setbacks and interface of the proposal in relation to the surrounding development, topography, streetscape and any public open spaces, including legibility from the bus stops along Binalong, Burrabogee and Ballendella Road and the site, and the inclusion of a pedestrian link connecting Binalong Road, Knox Road and Cornock Avenue and the site.

- **Publicly accessible pedestrian links through school grounds**

The submitted documentation shows some pedestrian connections to the south of the grounds connecting the car park and the adjoining streets but they appear to be primarily for students and staff rather than publicly accessible CPTED integrated connections through the site.

The long-term master plan (Architectus) for the school included in the Design Report indicates a street along the southern boundary between Cornock Avenue and Binalong Road also linking to Knox Road. The submitted documentation does not include this as a feature in the current scope of works. It is the opinion of Urban Design that if this is not developed now it is unlikely to be developed later.

Ideally this link should be a formed laneway 9m wide (6m vehicular + 3m pedestrian & cycle shareway) that can accommodate service and emergency vehicles and has visual surveillance from neighbouring properties. This laneway may be closed to regular traffic with bollards but should otherwise read as a public street.

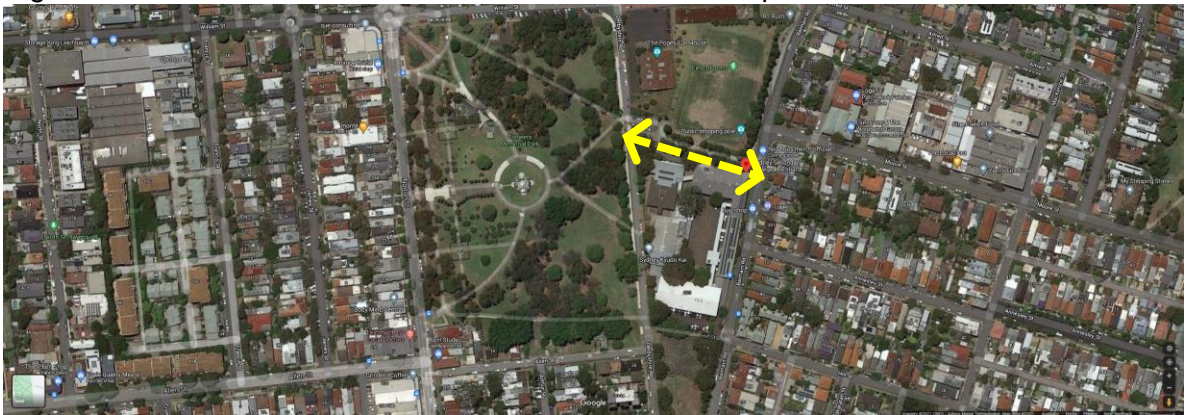


Fig 1: Example of publicly accessible pedestrian through link in a NSW School: Leichhardt Secondary School has a cycleway/pedestrian link from Moore Street W to Balmain Road, this link runs between the school and the playing fields and is fenced on both sides maintaining safety and security of school occupants but also allowing permeability for the general public. (Source: [Google Maps](#))



Fig 2: Street View of publicly accessible pedestrian through link in Leichhardt Secondary School, NSW (Source: [Google Maps](#))

- **Bulk of building**

The site is elevated along Binalong Road - this combined with the scale of the building and the cantilevered roof appears bulky along the northern boundary with the existing context of predominately one and two storey residential dwellings. Should the scale of

building not be altered, large canopy tree planting with understory screen planting along this edge is recommended to provide some screening and visual privacy to the adjoining residents.

B. Public Domain

- A public footpath approximately 3m wide to accommodate pedestrians, especially student movement, has been provided along the extent of the property boundary along Binalong Road. An upgraded public domain provision should be conditioned as part of the development.
- Increased landscaping at northern boundary for privacy to residences to the north as noted in the comment for 'Bulk of building'.
- While access is provided at the new entry, it lacks a sense of generousness i.e. the stairs are narrow, and the ramps appear boxed in. Also, the criss-cross of the w/c access interrupts movement on the stairs causing congestion and confusion on the stair landings which can be unsafe.
- Due to loss of the sports field, significant additional tree canopy planting should be considered in spaces where future buildings are not planned.

Urban Design recommendations:

- A. A direct, signposted, well-lit and publicly accessible pedestrian through link (min 3m wide) in the non-secure/non-fenced area of the school grounds connecting Binalong Road, Knox Road and Cornock Avenue is recommended (aligned with Architectus' Master Plan). This link should be designated as a Right of Way (ROW) in the land title.
- B. Large canopy tree and understorey screen planting should be conditioned as part of the development to provide visual privacy and screening to properties to the north of the proposed school building (82-88 Binalong Road).
- C. Applicant is advised to add more large trees (min 15 m tall), within the property boundary, at the embankment along Binalong Road to provide shade to the 3m wide footpath and children getting on and off the buses.
- D. A more generous entry off Binalong Road is recommended with wider stairs and deeper landings to allow improved integration and safety of the access ramps.

Conclusion

It is noted that this is the recommendation of Council officers and this submission has not been endorsed at a Council meeting.

Council appreciates the opportunity to comment on the above application, are supportive of the continued investment in School Infrastructure in the City of Parramatta and look forward to continued collaboration.

Should you wish to discuss the above matters, please contact Paul Sartor (Development Assessment Officer) on 9806 5740 or at psartor@cityofparramatta.nsw.gov.au

Yours sincerely



Mark Leotta
Group Manager, Development and Traffic Services Unit