



CITY OF PARRAMATTA

Our reference: SSD 7372
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Department of Planning and Environment
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ATTN: David Gibson

Dear David

**STATE SIGNIFICANT DEVELOPMENT 7372
O'CONNELL STREET PUBLIC SCHOOL, PARRAMATTA
FENCING OF THE FORMER KINGS SCHOOL PARADE GROUNDS**

For some time now Council has been liaising with the Department of Education (DoE) regarding both its pending State Significant Development application (SSD) and its associated "early works" program for initial demolition and site preparation works, the latter being the subject of a development application currently under assessment by Council.

From those discussions Council has identified crucial matters of concern which warrant notification to the Department, as set out below.

These issues, one of which relates to the potential fencing of the Old Kings School Parade Ground, are of fundamental importance to the City of Parramatta and we seek your urgent intervention to avert a significant degradation in the amenity of our CBD environment. Our concerns in that regard are set out in more detail below.

A. FENCING OF THE PARADE GROUND (Oval)

The Parade Ground sits between the school buildings and the Parramatta River. It is well positioned to the river foreshore, the Riverside Theatre precinct and Parramatta CBD to the east, while also providing a crucial link between the CBD and Parramatta Park to the west. The Parade Ground is the only significant open and flat space in prime proximity to the CBD that can accommodate large crowds for community events. Consequently for many years the Parade Ground and foreshore connections have been an important community asset.

A fundamental concern with the SSD project is the DoE's intention to enclose the Parade Ground with a 2.1m high security fence. The location of the proposed fencing will have serious implications for the activation of the City and the River.



Figure 1: Locality plan

Throughout consultation with DoE Council has strongly maintained a position that public access to the Parade Ground must be preserved, consistent with the aims, objectives and design strategies contained within the Parramatta City River Strategy, adopted by Council in May 2015. That same view was flagged by Council in its submission dated 26 November 2015 to the Department of Planning and Environment (DPE) in response to its request for comment on the Secretary's Environmental Assessment Requirements (SEARs) for SSD 7372.

Council is therefore extremely disappointed with the preliminary details recently received from the DoE showing the SSD application will propose a continuous 2.1m high fence around the oval edge fronting the Parramatta River, O'Connell Street and Marist Place (refer to **Attachment A**).

Set out below are further details which expand upon Council's concerns, along with precedents which demonstrate the DoE is able to manage its safety and security obligations whilst still allowing for shared community use of its ovals.

Parramatta City River Strategy

The Parramatta City River Strategy is a plan for revitalising the foreshore of the Parramatta River between Gasworks Bridge and Rings Bridge, O'Connell Street. It aims to improve connections between the river and the CBD and create more

recreational opportunities for residents, workers and visitors. The Strategy creates a new vision for the area and reclaims the river and its foreshore as a vibrant public space for the city.

Key opportunities identified in the Strategy which relate to this site are:

- Continuous pedestrian and cycle movement along the northern bank of the Parramatta River, and between the Riverside Theatre and the stadium;
- Kings School Parade ground to become a multipurpose space that could host a variety of events and public recreation opportunities;
- Creation of a Kings School Wetland which has the potential to improve water quality before they move downstream; and
- Enhancement of Marsden Street weir which provides a low-level pedestrian connection across the river

Noting the above, Council's advice to DoE on this issue has been:

- The alignments of security fencing should not prohibit the objectives and design strategies contained within the City River Strategy; and
- 2.1m high security fences are not appropriate along the boundary of the Parade Ground. Instead innovative and sympathetic fencing solutions are required for this location.

Major events and community uses

As noted, for many years the Parade Ground and foreshore connections have been an important community asset for various events, including:

- Major events such as Australia Day celebrations, New Year's Eve and the Sydney Festival;
- Cultural and community events such as Sydney Festival concerts, Parramasla concerts, India Day and the Winterfest Medieval Fair;
- Sports activities, including lunchtime and afternoon community and corporate competitions;
- School holiday programs;
- Activations supporting major events at Pirtek Stadium;
- As a pedestrian route for fans attending matches at Pirtek Stadium, walking from the City and major transport nodes to the Sports Precinct. This will become even more critical with the construction of the new Western Sydney Stadium with its increased capacity for 30,000 people; and
- A well-used pedestrian and cycling route along the river foreshore, connecting the City to Parramatta Park.

In 2015 the following three events were held at the Parade Ground:

- New Year's Eve – 15,000 attendees;

- India Day – 5,000 attendees; and
- Winter Fest – 5, 000 attendees.

Events like the New Year's Eve celebrations have grown by 10% over the last 5 years and are projected to continue to grow into the future, not the least due to the high number of residential developments within the CBD.

Council anticipates there will also be significant pressure to keep the Parade Ground available for events in the short term, particularly the next 3 years while the stadium is closed for redevelopment. During that time Council will be encouraging further events in the City to compensate for the loss of economic benefits the stadium brings.

Heritage

As this site is listed on the State Heritage Register (SHR) it will be the responsibility of the Office of Environment and Heritage (OEH) to evaluate the acceptability of the SSD application once lodged.

However Council notes that the 'Statement of Significance' of this site on the SHR includes the following commentary:

"The major landscape significance of the site is the spatial relationship between the wall of the buildings and the river. The gracious setback of the buildings demonstrates the principle of picturesque siting, giving the building group a 'prospect'. This layout of the site greatly contributes to the understanding of the early development of Parramatta as an important centre in the Colony and the attitudes to particular landscape settings (Mathew & Associates, Landscape Report, in Peddle Thorp, 1994)"

Council understands the preliminary view of the OEH is that the fencing as proposed would visually and physically alienate the oval from its river setting and therefore materially affect the significance of the former Kings School Group.

Council's position that the oval should remain available for public use is compatible with the concerns of OEH.

Flooding

The Parade Ground is affected by both the 1 in 20 year and 1 in 100 year flood events, with a high hazard. In such an event, the proposed fence design and location could prevent appropriate egress for shared pathway users, potentially resulting in entrapment. Any fencing for this area must recognise that constraint, and be located and designed appropriately.

Strategic Planning Framework

The *Strategic Planning Framework* is an outcome that Council, in conjunction with Infrastructure NSW, is working to achieve. It will link all departments of government, agencies and stakeholders such as Council to ensure plans and strategies are underpinned by a shared set of principles and priorities to coordinate better outcomes across the planning of our City.

The Department of Planning and Environment (DPE) amongst others, has been contributing to the Framework for some time. The relevant contact within DPE is Geoff King.

The question of how the Parade Ground is treated as part of this SSD application provides the opportunity for the DPE to demonstrate a commitment to implementing the Framework.

Options and solutions

Council has identified two precedents where the DoE has arrangements allowing for the community use of school ovals.

Carlingford High School

This school has playing fields which separate an oval and a public reserve owned by Hornsby Shire Council. An agreement between that Council and the DoE ensures public access to the school ovals, which are maintained by Council. There is no fencing around the oval. All school related fencing is between the oval and the school buildings (refer **Attachment B**).

Chatswood High School

Willoughby City Council has similar agreements with the DoE for the public use of ovals at the following schools:

- Chatswood High School
- Mowbray Public School
- Willoughby Girls High School

In the case of Chatswood High School and Mowbray Public School, the arrangement has been in place for more than 20 years.

B. SHARING OF EXISTING FACILITIES

Council has identified the following opportunities for the SSD project to utilise existing facilities:

Parking

The SDD application is expected to include a parking area at the western edge of the site adjacent to O'Connell Street.

The capacity of the site in that location is limited due to constraints such as significant vegetation, archaeology and the proximity of the Parade Ground. Operational concerns also arise given the potential for vehicles to queue within O'Connell Street.

Informal consultation between Council and the Parramatta Park Trust indicates the Trust may be open to the DoE leasing some parking spaces within the existing surface car park which is directly west of the school site, across O'Connell Street. This outcome could facilitate improved outcomes for site planning, heritage and traffic management.

Co-sharing of nearby school facilities

Our Lady of Mercy College is located at Nos. 2-6 Victoria Road Parramatta, just to the north of this site. Construction is presently underway for at that school for a range of additional facilities, including a multi-purpose building with a large space suitable for school assemblies, performances and indoor sports activities, as well as an open air roof top sports court.

The co-sharing of those facilities with this new public school would again present opportunities for improved site planning outcomes, and cost savings.

The next steps

While it is acknowledged there will be an opportunity to formally comment on these matters via the assessment process for the SSD application, these issues, in particular the fencing of the Parade Ground, are so fundamental that Council is compelled to alert the DPE and request that it commence its own consultation with the DoE to ensure the best outcome for our City is achieved.

The Parade Ground is an important event site in a key city location. Its loss will damage our City's capacity to hold large scale events and its reputation as an 'event ready city'.

Please contact Brad Roeleven, Executive Planner, City Significant Development, should require any clarification or addition information.

Yours faithfully

Greg Dyer
Chief Executive Officer