



Your Reference: SSD 15_7372
Our Reference: NCA/4/2016
Contact: Myfanwy McNally
Telephone: 9806 5447

15 August 2016

Peter McManus
Department of Planning and Environment
22-23 Bridge Street Sydney
NSW 2000

Dear Mr McManus

Re: New O'Connell Street Public School at 3 Marist Place & 24 O'Connell Street, PARRAMATTA NSW 2150

Thank you for the opportunity to comment on the proposal currently on exhibition.

The City of Parramatta Council would like to raise the following concerns with the information currently provided as part of the application.

Oval Fencing

As outlined in Council's letter to the Department of Planning, dated 11 May 2016 (attached), significant concern is raised as to the principle of a fence along the southern boundary of the site for the following reasons:

- 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 River Strategy.
- This fence creates a barrier to public use of the oval outside school hours. The playing fields have previously been open to the public.
- The fence would facilitate entrapment of shared pathway users during flash flooding.

There is an opportunity to realign this fence along the northern perimeter of the oval to ensure compliance with Department of Education security requirements whilst facilitating community access to the oval for events and general recreation.

It is noted that the proposed perimeter fencing of the existing oval has been reduced in height (from 2.15 to 1.2m) to minimise visual impacts. Council officers welcome the reduction in the perimeter fence height. If the Department is of a mind to approve the fence then the following further considerations should be made:

- The alignment of the fence responds directly to property boundaries, resulting in an irregular shape that has a weak relationship to the heritage buildings. It is strongly recommended that the landscape response to the oval includes interpretation of the heritage landscape setting, rather than conservation of contemporary changes to this area. This particularly relates to the alignment and materiality of the fence, which should address the 'spatial relationship between the wall of the buildings and the river' (Thorpe, 1995) and the former King's School oval/Military Parade ground. *"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)
- Concern is raised as to the choice of materials for the proposed fencing along the riverbank. The fencing chosen will have a large impact on the relationship between the public domain and the school and requires further discussion with Council before it is agreed.
- Council's Urban Design team requests that they are part of ongoing consultation with the Government Architect and Department of Education to determine the final alignment and specification of the fence.
- A minimum offset of 0.5m from the shared pathway is required for compliance with the relevant Australian Standards.

Recreation & Services

Council officers welcome discussions taking place to provide access to the Parade Grounds for the community, council activities/services and major events. It is recommended that consideration be given to the practical requirements necessary to facilitate the above events.

A draft strategy should be provided which outlines areas available for public use, the type of events the parade grounds will be able to accommodate, how recreational booking will be managed, how informal access for local residents and workers will be provided, how the grounds will be managed/activated during event days at the adjacent Parramatta Stadium, and how suitable access will be provided (i.e. trucks to bump-in major event equipment).

Any specific design requirements should be integrated into the final design of the proposal.

Community Use

The strategy discussed above should also set out to what extent internal areas (such as industrial arts, arts, food technology classrooms, etc) within the school can be used by community groups outside of school hours.

Car Park

An important element of the site's heritage is its landscape setting, which is characterised by an open grassed oval. It is recommended that the car park on O'Connell Street responds to this character by treating the ground surface with 'grasscrete' or similar.

Realignment of the car park is also recommended in conjunction with realignment of fence, so that both provide stronger response to historical uses, namely the oval/parade ground and the relationship to the buildings.

Street Trees

Street trees on O'Connell Street provide important amenity to pedestrians through shade and buffering from traffic. Removal of tree T72 would result in lost pedestrian amenity and street definition on O'Connell Street. It is recommended that 2x *Platanus orientalis* 'Digitata' are planted on O'Connell Street to redress lost amenity resulting from removal of tree T72.

Road, Curb, Pedestrian Pathways

Concern is raised as to the lack of consideration of integration of road, curb and pedestrian pathway improvements in the EIS. Such consideration will be important to ensure the safety and amenity of students and other stakeholders.

Western Sydney Stadium

Western Sydney Stadium is set to replace the current Parramatta Stadium within the next 2 to 3 years. As part of the stadium development, integration of the stadium precinct with the city and its surrounds is currently unresolved. The new school will need to have adaptability to integrate with this precinct.

The school is located in the direct line between a potential Light Rail Stop and the new stadium. Consideration should be given to how people will be directed through and/or around the site. Moving significant crowds in and out of the stadium on event days in addition to traffic and related matters provides further complexity. There is also expected to be increased activation along O'Connell St in the future to enhance and expand the precincts viability and service potential on non-event days. The extent and nature of those plans are still unclear at this stage. The collective impact and priorities of these different land uses will require an integrated and coordinated approach to traffic and pedestrian management and design.

Open Space

Playground Shade

The landscape plans indicate that a number of outdoor landscaped playspaces are to be provided; however these incorporate minimal shade (which is particularly important during the summer months). More shade provision should be incorporated into these facilities, preferably through additional deciduous trees which will allow for winter solar access.

Heritage

Assessment against Council's DCP and LEP heritage provisions does not indicate any critical non-compliance with heritage sections of these instruments.

However, concern is raised regarding the shape of the roof of the newly proposed hall. The combination of different roof slopes and asymmetrical profile (in longitudinal section) would look awkward in the context of the site in which all other buildings are symmetrically formed and have consistent slopes on all sides of every individual roof. This detail could particularly impact on views in which the new building is visible in the wider context of the heritage buildings, notably including from the direction of the Oval.

Concern is raised regarding the use of metal wire dubbed "PMS" in drawings, as this element is annotated to be "integrated into building structure" and in "accent colours". However, details of this accentuation do not appear to have been provided. Larger scale elevation details should be provided for a further assessment of the proposal.

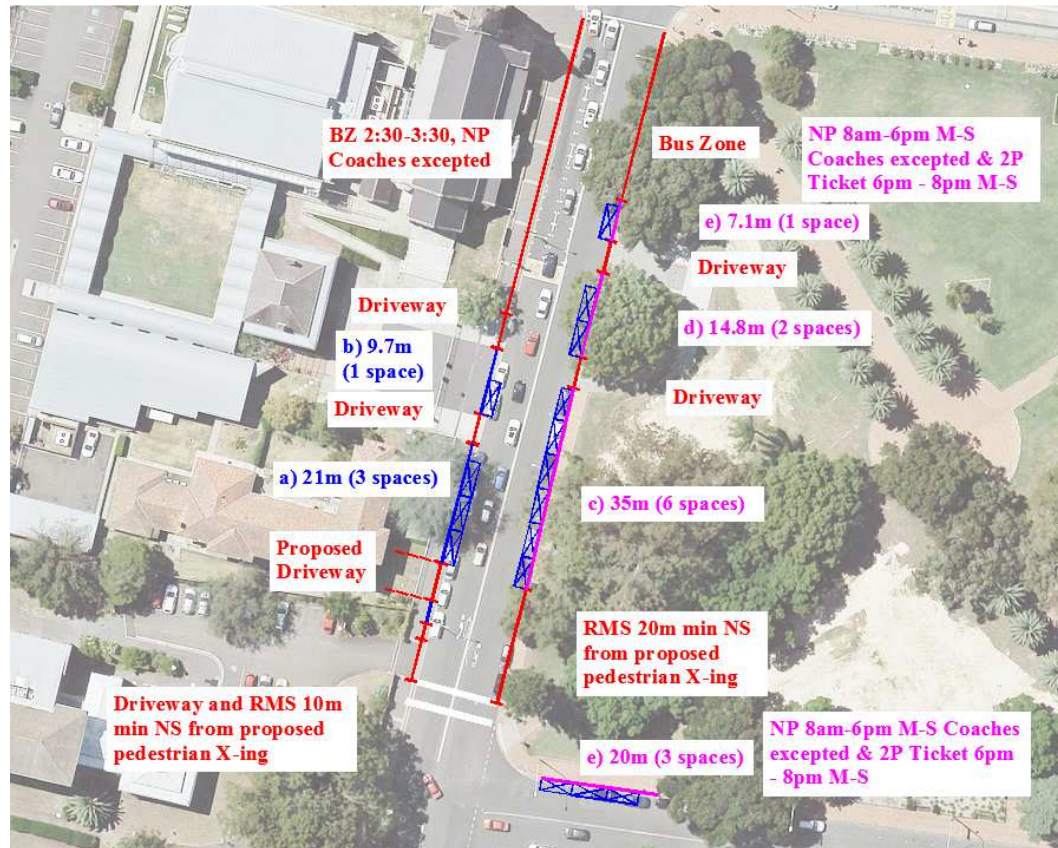
Traffic & Transport

Assessment of Available Student Set-Down / Pick-up Spaces

The proposal includes use of Marist Place and Market Street for off-site set down and pick up of students, to be facilitated via amendments to on-street parking restrictions and installation of a pedestrian crossing.

Discounting the driveways, the bus zone and RMS no-stopping requirements regarding the proposed pedestrian crossing, the total available set-down/pick-up parking for the current proposal is **16 spaces** (see figure below) rather than the 35 in the applicant's report¹.

¹ This parking estimate is based on AS2890.5-1993 requirements for on-street parking space dimensions, using the standard 6m minimum length for on-street parallel spaces (with 5.4m for unenclosed spaces).



The results of the site visit and use of more conservative assumptions shows a likelihood of significant parking demand within the proposed set-down / pick-up area, which contains just 16 potential spaces (not the 35 in the applicant's report). Although the proposed alteration of parking restrictions in the area to allow for pick-up and set-down of students is supported, these results show there is not enough potential on-street parking available within the area shown in the application to accommodate the demands of the development. The high demand and shortage of on-street parking spaces will result in significant traffic flows that are not likely to be accommodated in the area, particularly in the afternoon. It is recommended that additional measures beyond what is proposed in the Traffic Report are provided to accommodate and/or mitigate the demand for pick-up/set-down parking.

The addition of 'No Parking 8am – 9:30am & 2:30pm – 4:00pm School Days' restrictions to the 16 available on-street parking spaces shown in the above figure, to encourage pick up and set down of students, is supported. Such changes will be required to be approved via Parramatta Traffic Committee (PTC) prior to the commencement of any related works. Pending PTC approval signs are to be installed to Council requirements at no cost to Council.

The proposed crossing should be implemented as a 'raised pedestrian crossing' and its installation is required to be approved via PTC prior to the commencement of any related works. Pending PTC approval the crossing is to be installed to Council requirements at no cost to Council.

Cycling

The transport study states that 50% of all students are expected to either walk or cycle, though no further breakdown is given.

Regarding provision for cycling at the school, the transport study does not clearly state which cycleways are adjacent to the school (namely PVC along the River & O'Connell St shared path), nor does it acknowledge that as it is a primary school all footpaths are legal for students (under 12) and their accompanying parents to cycle on.

It is considered that the proposed 20 racks are insufficient for a school population of 1000 and staff of over 60.

Students

The Parramatta LEP and DCP do not set cycle parking rates for educational establishments. However, guidance can be taken from other states and local government controls. A common rule for primary schools is 1 rack per 5 students in Year 4 and above (Victoria and Western Australia, and similar to ACT code and Brisbane City). This would equate to 85 racks based upon a school population of 1000. These should be provided in a secure, undercover, bike cage conveniently located near the main entrance.

Staff

The transport study does not address provision for staff to cycle to work (secure bike parking, change facilities, lockers and showers). NSW Planning Guidelines for Walking & Cycling have guidance on bicycle parking rates for staff at educational facilities. They recommend 5% of staff to be provided with secure storage and 10% of staff as casual use bike racks. For 61 staff, this would be 3 & 6 respectively. However, it is recommended that a minimum of 5 racks are provided within an undercover secure storage area with a further 10 undercover bicycle racks close to the entrance. The proposal should include 1 male and 1 female shower with associated change rooms and 5 secure individual lockers.

The transport study recommendation of a Green Travel Plan should be required by condition.

Walking

It is recommended (in addition to what is proposed) that a pedestrian refuge be included on Market St, at the Marist PI end, to allow pedestrians to cross a single lane of traffic at a time.

The Council is keen it work with the NSW Department of Education on the detailed design development for this site. The Council would also welcome a chance to input on any conditions that the Department is considering in relation to any future consent.

Yours sincerely

A handwritten signature in black ink that reads "Myfanwy McNally". The script is cursive and fluid.

Myfanwy McNally
Manager City Significant Development