

Your Reference: SSD 8790
Our Reference: NCA/2/2018
Contact: Maya Sarwary
Telephone: 9806 5578

Attention: Aditi Coomar

25 October 2018

Dear Lucas

SSD 8790 - Redevelopment of Parramatta West Public School

City of Parramatta Submission

I refer to the proposal for alterations and additions to Parramatta West Public School.

Council officers have reviewed the documentation on the NSW Planning and Environment website with respect to this application and wish to make the following comments.

Loss of of Open Spaces

The proposed location of the new northern building will result in a significant loss of open space that is 'used as a playground during lunch and recess' and can adequately accommodate sporting and other active recreational activities. Access to the existing quantity of open space provided by the northern school site is essential for the 900+ students to be able to satisfactorily meet the physical education requirements of students consistent with the **Department of Education 'Sport and Physical Activity Policy'**. This policy requires that *"...Students in Years K-10 participate in a minimum of 150 minutes of planned moderate with some vigorous physical activity across the school week"*. The significantly reduced open space within the school will have inadequate capacity to accommodate physical activity requirements of the large volume of students during school hours.

Councils draft Social Infrastructure Strategy (SIS) has identified that the majority of our existing sports fields are at capacity, with nearby Jones Park and Ollie Webb Reserve already 'operating far above capacity' at current usage rates. Demands on Councils open spaces (particularly sporting fields) will be exacerbated by forecast future population growth associated with increasing residential densities in the surrounding area, with Jones Park and Ollie Webb Reserve not able to accommodate the additional demand created by the reduced open space within the school. The **Social Impact Assessment (SIA)** accompanying the EIS inadequately addresses the impact of open space loss and has not considered the findings of Councils SIS. It incorrectly assumes that *'Playing fields, additional parks and areas of passive open space are available nearby within walking distance'* and needs to be revised to reflect the findings of Councils draft SIS. The SIA also needs to demonstrate how the impacts of reduced open space will be addressed to ensure that students will be able to meet the physical activity requirements of the Department of Education 'Sport and Physical Activity Policy' in the context of the limited capacity of nearby Council open space.

The proposed significant reduction in open space within the school site is also inconsistent with applicable State planning provisions and strategies, which recognise the importance of open space for physical and psychological wellbeing and development, including:

Healthy Urban Development Checklist (NSW Health)	PA3	<i>Promote access to useable and quality public open space and recreational facilities'</i>
Central City District Plan	C17	<i>'Protect, enhance and expand public open space by delivering shared and co-located sports and recreational facilities including shared school grounds'</i>
Design Guide for Schools (NSW Government Architects)	5 (Amenity)	<i>'Ensure outdoor play ground space is sufficient to accommodate the student population including future growth.'</i>

Whilst it is acknowledged that the school would need to continue to operate whilst the new facilities are under construction, the existing demountable buildings could be temporarily relocated into the northern open space site during works. This would allow for the required new educational facilities to be incorporated into the southern site and enable retention of northern site as open space, providing for a significantly better outcome that is more consistent with applicable planning provisions, policies and strategies.

RECOMMENDATIONS

- i. *Revise the Social Impact Assessment to reflect Council's draft Social Infrastructure Strategy and more adequately address the loss of open space provision within the school.*
- ii. *Incorporate new buildings into the southern site and retain existing northern site as open space consistent with the Central City District Plan (Planning Priority C17), Health Urban Development Checklist (PA3) and Design Guide for Schools (Principle 5).*

Urban Design

- The proposed new building has in some respects an industrial aesthetic. This is at odds with the predominant residential aesthetic of the existing school buildings (in particular the historic school buildings) and of the surrounding low density residential area. Modulation of the façade should be provided to reduce bulk, breaking roof planes into smaller areas, use of design features to provide fine grain visual interest, materials that are not industrial in character, windows set on the inside face, and appropriate colours.
- The scale of the building is considerably larger than that of the existing school buildings and is at odds with the scale of surrounding development. The bulk of the building should be reduced, in particular the scale of the Franklin Street façade.
- The building should be set further back from the side boundary in order to protect the amenity of neighbouring residents and to retain existing trees.
- The building should be sited so as to protect all existing significant canopy trees – along the side boundary as well as the street boundary. New trees should

also be planted along the entire length of the Railway Street boundary. The trees should be tall trees (over 13 metres) with spreading canopies.

- Consider upgrading the existing pedestrian crossing.
- The retained playing field should remain public accessible.

Height

The height of the development exceeds the maximum 9m height control stipulated by the Holroyd Local Environmental Plan 2013.

In order to minimise adverse impacts on the streetscape and on adjoining residential properties the height of the development should comply with the 9m maximum control applicable to the site.

Pedestrian Refuge Island in Franklin Street

The pedestrian refuge island in Franklin Street should be constructed on the north side of Railway Street in a manner such that it can easily be upgraded to a pedestrian crossing by Council if the numbers of pedestrians meet the RMS requirements for a pedestrian crossing.

Amenity of Nearby Residents

It is recommended that a greater setback is proposed between the new building and the eastern boundary of the site and windows be reduced/made highlight windows to reduce overlooking and acoustic impacts to adjoining properties.

It is also recommended that dense landscape screening is proposed within the eastern boundary setback area of the site to assist with screening of the development and to reduce potential visual impacts from adjoining properties.

Trees

There are a number of mature existing trees located on the subject property which will either incur impacts or require removal in order to facilitate the proposal. The following recommendations are made: -

- Existing mature trees, assessed by a AQF Level 5 Arborist, should be retained where possible. Consideration should be made for the retention of existing mature trees and vegetation to the perimeter boundaries of the site with additional supplementary planting to provide screening and scale to the built form whilst strengthening locally endemic plant communities.
- A recommendation is made to engage a AQF Level 5 Consulting Arborist to provide advice as to suitable locations and planting distances for large trees to minimise risk to high pedestrian zones and impacts to infrastructure.

- The engagement of a AQF Level 5 Arborist ('Project Arborist') to provide an Existing Tree Management Plan to incorporate tree protection measures in accordance with AS4970-2009 (Protection of Trees on Development Sites).
- The Project Arborist must supervise all constructions works, including demolition and site management, within five (5) metres of any existing tree to be retained.

Social Impacts

- The SEARs report does not provide an adequate assessment of the potential positive and negative social impacts of this development nor appropriate mitigation strategies.
- The applicant states that "...the development is a significant opportunity to expand Parramatta West Public School and deliver a high-quality education establishment and meet the demand of a growing population due to suburban densification, and, provide services to meet the day to day needs of the local community".
- The SIS (page 60) states that "...No adverse impacts have been identified on the adjoining public open space areas as a result of the development".
- Council Officers are not satisfied at this point in time with the level of information and evidence provided in support of this statement.
- Given the location of the site to Council's existing sporting field sites of Ollie Webb Reserve and Jones Park, it is highly likely that due to the gap in provision of open space as apparent in the proposed development application, the school will rely on the assumed availability of Council's nearby open space facilities to meet the recreation needs of its students.

Open Space Provision in Parramatta

The population of the Parramatta suburb is forecast to grow from 26,958 residents in 2016 to 55,598 residents in 2036. Many of these residents, including families with children, will be living in high density dwellings with limited space. Many residents are also likely to be renting, and the Parramatta suburb as a whole will be a mix of low, medium and high income households with a mix of cultural diversity.

Often where high density is proposed in the future, there is already a low provision of open space, and this includes the Parramatta suburb (containing the CBD).

Residents of Parramatta will increasingly rely on publicly available community facilities and public open space to meet their sporting and recreational needs. In addition, Parramatta will increasingly attract visitors, students and businesses, many of whom will require access to open space.

Existing open space including parks and sports fields in Parramatta are under significant pressure due to increased demand. The open space provision for Parramatta suburb (excluding natural areas, general community use and non-Council) is as follows.

Suburb	Catchment Area	Suburb Land Area (hectares)	2011 pop'n	2036 pop'n	OS Requirement (based on 11% of land + consider 0.5ha/1,000)	2016 Current Provision Sport and Recreation OS	Current position - Under or Over Required Provision
Parramatta Suburb	4	558	19.737	55.246	61.4	29.20	-32.20

There is a significant gap in provision for the population size in Parramatta suburb of more than 32 hectares.

Council's open spaces are struggling to keep up with growing demand, with many parks and sports fields operating at or above capacity. In particular, concerns include:

- *The pressure of growth on existing open space assets* - City of Parramatta's existing open space is highly valued by our communities, however, it has reached capacity and in many cases is operating above capacity.
- *Increasing cost of providing infrastructure* - The increasing value of land across City of Parramatta means that opportunities to purchase additional land or buildings for open space provision is limited. Legislative requirements are evolving, maintenance costs are rising, and community expectations are increasing which means that Council is having to rethink the best approach to open space provision.
- *Inequality is still an issue* - There are people within our community who face barriers to participation and there are gaps in provision of open space where the private market does not deliver enough, or within an affordable price range for many, or in the necessary locations.

For this reason, the retention of existing open space within the Parramatta suburb is sought and necessary to enable a more socially sustainable community.

Impact on Open Space Provision - Potential for Reduction in Open Space and Increased load on Public Sports fields/Parks

Some schools are heavily reliant on using Council's open space for their sporting activities due to reduced availability of facilities within school grounds and growing student numbers. The impacts of this are already being felt.

The open space available within schools across the LGA is gradually diminishing due to the need for DOE to build on their open spaces to accommodate growing demand for school places. This means that schools are increasingly relying on Council's open space facilities to meet their gap in provision. This compromises the capacity of Council's existing open space to act as a resource for the broader community.

If the proposed development were to be implemented, this could result in a significant loss of active open space for both students of Parramatta West Public School and potentially a reduction in availability of public recreation and sporting open space for the broader community.

The remaining open space following the proposed redesign would not be able to physically accommodate the 900+ students to undertake their physical education requirements as per the Department of Education 'Sport and Physical Activity Policy'

which requires that "...Students in Years K-10 participate in a minimum of 150 minutes of planned moderate with some vigorous physical activity across the school week".

Council has already undertaken a detailed assessment of the carrying capacity of its sporting fields. This analysis showed that Jones Park and Ollie Webb Reserve, located close to Parramatta West Public School, are already defined as 'operating far above capacity' at current usage rates. Given this finding, these fields do not have any capacity to sustain an increased load of use generated by students from Parramatta West Public School.

Council in its draft Social Infrastructure Strategy 2017, identifies its intention to play a more significant role in expanding access to open space for the community. The demand for open space will only grow as Parramatta's population profile, which is diverse and complex, continues to grow. The proposal conflicts with the principles of Council's draft Social Infrastructure Strategy which aims to secure community access to school fields as required to meet the increasing demand in the context of Council fields being at or above capacity. There are approximately ten public schools within City of Parramatta that have sports fields of varied sizes that have been identified as having potential to be made accessible to the broader community through joint and shared use arrangements.

If the trend of schools filling their open space with school buildings continues, no Australian school will provide sports fields for its students in future. This trend cannot continue without joined up, transparent, inter-governmental planning processes that will realise the adequate provision of active open space for school students in the context of City planning. Planning of school sites without adequate sporting and recreation space cannot continue in this way and will not support socially sustainable communities.

SUMMARY AND RECOMMENDATIONS

Concerns relate to the current and future needs of students attending Parramatta West Public School and how their recreation and sporting requirements will be met into the future. Concerns also relate to the potential expectation of use of Council-owned public open spaces for schools (casual, temporary and/or permanent) which also have to serve the community. We note our community overall is under significant population growth and we have a significant diversity in needs to meet. Many of our sports fields are already at or operating over capacity. Council's fields closest to the school site being, Jones Park and Ollie Webb Reserve, are highly utilised by the local community and are currently operating far above capacity.

Further information is required before comments can be finalised and recommendations can be made.

The SO Team ask that DOE respond to the following questions:

1. Please detail how the proposed development and planning principles meet the NSW Department of Education's own guidelines in the *NSW Government Architects 'Design Guide for Schools'* and the *State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017* (Schedule 4).

2. Please detail how the recreation and sporting needs of the current and future school students at Parramatta West Public School will be met.
3. Please detail any expectations the school has about temporary, causal or permanent use of Council's open space parks and fields, being as specific as possible about hours of use, sites and types of use.

Ideally, any redesign of the Parramatta West Public School should seek to retain the active recreation open space for use by the school students but also the growing local community through supportive shared use arrangements.

If the trend of schools filling their open space with school buildings continues, no Australian school will provide sports fields for its students in future. This trend cannot continue without joined up, transparent, inter-governmental planning processes that will realise the adequate provision of active open space for school students in the context of City planning. Planning of school sites without adequate sporting and recreation space cannot continue in this way and will not support socially sustainable communities.

Council thanks you for the opportunity to provide comment on this application and would also welcome the opportunity to comment on further stages associated with the detailed design development of the site.

If you require any further information regarding this matter, please do not hesitate to contact me.

Kind Regards

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Development Advice Team

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PARRAMATTA**