

Department of Planning, Industry and  
Environment  
4 Parramatta Square, 12 Darcy Street  
Parramatta NSW 2124  
Attention: Dimitri Gotsis

<b>Your Reference</b>	SSD-9250948
<b>Our Reference</b>	NCA/6/2020
<b>Contact</b>	Kate Lafferty
<b>Telephone</b>	9806 5393
<b>Email</b>	klafferty@cityofparramatta.nsw.gov.au

**15 June 2021**

Dear Mr. Gotsis,

**COUNCIL COMMENTS – RESPONSE TO EXHIBITION  
96-104 Carlingford Road, Epping  
(Alterations & Additions to Epping West Public School)**

I refer to the recent exhibition of the SSD to carry out alterations and additions to Epping West Public School, including the following:

- Demolition of Building G, alterations and refurbishment of existing buildings, construction of two new buildings, removal of demountable classrooms and landscaping.

The EIS and supporting documentation have been reviewed and Council officers request that the following comments are considered in the assessment of the application.

**TRAFFIC AND CAR PARKING**

**Car Parking**

Council comments on the SEARs requested the applicant confirm the number of staff at the school and the method they use to travel to work. It is noted that there are currently 72 staff members and only 56 parking spaces. This is a shortfall of 16 parking spaces under the Hornsby DCP requirements which requires 1 parking space per staff member.

From a review of the TIA, a survey of staff does not appear to have taken place to confirm if the shortfall is acceptable or not. The justification given regarding the shortfall is that there will be a reduction of staff as a result of the proposed development. This justification is not supported by Council as recent increases to the size of the school have been accommodated with the installation of a significant number of temporary demountable buildings where traffic would not have been given the same level of consideration as permanent buildings. Given this, it is recommended that a staff travel mode survey be undertaken before the development is approved to confirm whether the existing carpark needs to be upgraded.

It would be preferable that the school caters for the demand for parking on site and that this be addressed further.

**Contact us:**

council@cityofparramatta.nsw.gov.au | 02 9806 5050  
@cityofparramatta | PO Box 32, Parramatta, NSW 2124  
ABN 49 907 174 773 | [cityofparramatta.nsw.gov.au](http://cityofparramatta.nsw.gov.au)

## Traffic Generation

As part of the SEARs, Traffic and Transport requested that traffic modelling be undertaken for the intersection of Midson Road and Lilli Pilli Street as part of the TIA. Accordingly, TIA has undertaken SIDRA modelling and has shown that the intersection will perform at a satisfactory level of service with remaining capacity. No further action is required in this regard.

## Kiss and Ride

It is noted that Council will be making a number of changes in Ryde Street. As such, the TIA did not undertake a survey of pick up and drop of activities in this street but did undertake a review for both Dent Street and Ward Street. It was noted that the vast majority of activity was occurring in Ward Street where the angle parking was operating inefficiently. However, no works are proposed in this regard considering that school numbers will be decreasing from the existing rate.

It is noted that in addition to works in Ryde Street, Council will be constructing a Raised Pedestrian Crossing in Ward Street. Council can investigate opportunities to provide additional Kiss and Ride Parking as part of this proposal if required. Accordingly, further action from the applicant is not required.

## Footpath Upgrade

It is noted that in accordance with the EIS, SINSW are proposing to fund Council to construct the footpath on the east side of Lilli Pilli Street. There have already been discussions regarding this matter between Council and SINSW and the footpath is required for the pedestrian crossing that Council has received funding to do next financial year. A draft recommended condition regarding this matter is provided below.

## Traffic Related Conditions

As noted above, it is recommended that additional information regarding a Staff Travel Survey be provided to confirm whether staff parking is provided at a satisfactory rate. However, should the development be approved, the following traffic conditions should be included:

### Recommended conditions are as follows:

#### **Prior to the issue of a Construction Certificate**

*School Infrastructure NSW (SINSW) is to enter into an agreement with Council for the proposed footpath on the east side of Ward Street between Carlingford Road and Lilli Pilli Street. The agreement is to be such that SINSW is to provide Council with the funds to construct the facility within the 2021/22 financial year.*

**Reason:** To ensure safe access to and from the school.

#### **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.

### **During Work**

*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.*

## **STORMWATER DRAINAGE**

A preliminary assessment of the drainage disposal system has been carried out. The overall concept and the methodology proposed for the control of the water quantity and water quality systems appears to be acceptable. Council officers note however, that certain details are missing from the submitted drainage plans. In this regard, it is requested that the following information be submitted:

- Plan and cross-sectional details of the proposed underground OSD tank, rainwater tank and the treatment chamber in relation to the layout configuration. Please also provide the details of the levels, overflow weir, control orifice plate details, the by-pass chamber details etc.
- Details of the proposed filtration system and the gross pollutant traps with their respective locations
- Calculation Design Summary Sheets, for the proposed OSD system, based on the Hornsby Shire Council DCP requirements.

Please note that the proponent's hydraulic engineer is currently liaising with Council staff regarding the above matters.

## **ENVIRONMENTAL HEALTH MATTERS**

Based on the documents submitted with the application, no significant environmental health issues are raised. Recommendations within the supporting documentation should be adhered to.

## **TREE MANAGEMENT & LANDSCAPING**

No objections are raised to the removal of the following trees to facilitate the development. Please note that the numbering within the table below reflects the independent arborist report.

<b>Tree No.</b>	<b>Name</b>	<b>Common Name</b>	<b>Location</b>
102	<i>Grevillea robusta</i>	Silky Oak	Ward Street frontage
104	<i>Eucalyptus crebra</i>	Narrow leaf Ironbark	Ward Street frontage
105	<i>Citharexylum sp</i>	Fiddlewood	Ward Street frontage
106	<i>Tristaniaopsis laurina</i>	Water Gum	Ward Street frontage
115	<i>Eucalyptus sp</i>	Eucalypt	Site centre
116	<i>Eucalyptus sp</i>	Eucalypt	Site centre

It is noted that there is one high retention value tree (*Quercus robur* (Oak) identified as Tree 99 in the arborist report) which will be impacted by the proposed stormwater works, however this tree should be able to be successfully retained with tree sensitive construction measures.

**Recommended conditions are as follows:**

*Prior to the issue of the Construction Certificate (or Crown equivalent), the Certifying Authority must be satisfied the following matters regarding the protection of the *Quercus robur* (Oak) identified as Tree 99 in the arborist report has been addressed:*

- *The proposed stormwater infrastructure will be designed so as not to impact on the tree*
- *A Methodology Statement, prepared by a suitably qualified consulting arborist (Australian Qualification Framework Level 5), must be prepared. This statement is to identify the measures to be implemented for protection of the tree during construction and the expected future health of the tree. The statement is to be structured so that each of the following stages of construction are individually addressed and supervised by the project arborist:*
  - (a) Tree Protection Measures inclusive of canopy, trunk and tree root protection in accordance with AS 4970-2009 - Protection of Trees on Development Sites;*
  - (b) Supervision of any excavation to be undertaken within 10m of the tree*
  - (c) Installation of services (ie. bridging of roots) and back filling;*
  - (d) Landscaping*
  - (e) Any other stages that the project arborist deems necessary.*

**Reason:** *To ensure adequate protection of existing trees.*

*The trees identified for protection within the consent shall be protected prior to and during the demolition/construction process in accordance with the Arboricultural Impact Assessment and Tree Protection Plan prepared by Arboreport dated 22 April 2021 and the conditions of consent.*

**Reason:** *To ensure the protection of the tree(s) to be retained on the site.*

## **SOCIAL OUTCOMES**

### **Site Capacity**

It is noted that the application states that there will be a future decrease in enrolments and the school will accommodate a reduced number of students on site from 1300 to 1000 by the year 2028.

Concern is raised that the future reduction in enrolment capacity does not take into consideration the future demographic projections or account for future growth of the population within the school's catchment. Demographic modelling to show the anticipated number of primary-school aged students for the catchment should be provided to ensure that the proposed development would adequately meet the population needs of the area.

Council officers also raise the importance of planning both the Epping West and the new Epping South schools simultaneously so that they complement each other and ensure delivery of optimum education facilities for the area.

### **Climate Considerations**

Council officers raised the following matter at the SEARs stage of this project:

- The Climate Council states young kids are 'most at risk' of heatwaves, which are increasing in prevalence and length; Epping was reported to reach 47 degrees Celsius on 4/1/20.
- Details are requested on the passive cooling measures to be included to sustainably improve indoor thermal comfort and air quality, and support the health and wellbeing of staff and students. This includes the second new building (8 homebases across two storeys) whereby the modular design does not reduce the comfort or health of its occupants.
- Details of shade measures, including canopy cover, to be introduced to reduce the UVR exposure to children outside. It is noted there is intention to remove at least six trees, (with a

potential total of 14 trees) due to construction which will reduce the ambient cooling of the urban heat island effect, as well as UVR protection for students and staff.

These matters do not appear to have been addressed within the application. Council requests that the proponent provides clarity on how passive cooling measures will be included to sustainably improve indoor thermal comfort and air quality, and support the health and wellbeing of staff and students.

### **Shared Usage**

Details of community use and out of hours use are provided extensively in the EIS. Council officers are supportive of the plans outlined in Part 2.1 of the EIS outlining the community use of the school to include the school hall and other spaces outside of school hours. This is to include martial arts groups, foreign language schools, an Indian Orthodox church, the Australian Air League, chess, drama, music, and academic groups. Additionally, Council officers are supportive of Part 3.4 and Section 4 of the Operational Management Plan prepared by Johnstaff in addressing community use of the school.

### **Open Space Provision**

Concern is raised with respect to the amount of open space to be provided for the students of the school.

It is noted that there is a discrepancy as to the number of demountable classrooms to be removed during this project stage – the EIS states 11 x demountable buildings, however the architectural plans indicate 12 x demountable buildings are to be removed. This should be clarified by the proponent as it may impact upon the amount of open space available. It is acknowledged that the remainder of the demountable buildings will be removed as part of a separate future application, which will increase the availability of open space on the property.

Notwithstanding the above, the predicted provision of open space for this project appears to be non-compliant with the Department of Education's requirements for the provision of open space to be a minimum of 10m<sup>2</sup> per child. Open space provisions compliant with the Department of Education's requirements should be investigated and clarified.

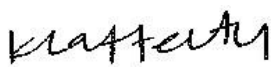
### **NEXT STEPS**

The City of Parramatta Council thanks you for the opportunity to comment on the application. We look forward to working with the Department and the applicant to progress the development of this site.

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

Should you require any further information in this regard please contact me on the above contact details.

Yours sincerely,



Kate Lafferty  
**Executive Planner**  
**City Significant Development**