

Department of Planning, Industry and
Environment
4 Parramatta Square, 12 Darcy Street
Parramatta NSW 2124
Attention: Navdeep Singh Shergill

Your Reference	SSD8873789
Our Reference	NCA/5/2020
Contact	Kate Lafferty
Telephone	9806 5393
Email	klafferty@cityofparramatta.nsw.gov.au

22 June 2021

Dear Mr. Singh Shergill,

**COUNCIL COMMENTS – RESPONSE TO EXHIBITION
86 Chelmsford Avenue, Epping (New Epping South Primary School)**

I refer to the recent exhibition of the SSD to construct a new primary school, including the following:

- A concept master plan for the establishment of a new K-6 primary school, master planned to cater for up to 1000 students, including new buildings, car parking, landscaping and site facilities.
- Stage 1 approval for a 3 storey building comprising 25 homebases, three (3) special education learning areas, administration and staff areas, canteen, library and amenities, a single storey hall/OOSH building with associated COLA. Stage 1 will have a capacity of 600 K-6 students and 38 staff (28 teaching staff and 10 support staff).

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

SCHOOL FACILITY DESIGN AND USAGE

Demographic Data – Future Projections

Demographic data on the current Epping community has been presented in the Social Impact Assessment (SIA). However, given the projected growth of the Parramatta LGA over the next 10 – 20 years, the development must accommodate the needs of the future Epping community. No demographic modelling has been provided as part of the SIA or EIS to demonstrate suitability of the proposed development.

Demographic modelling (including data sources) 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.

Potential Shared Community Use

Clause 35 of State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017 (Education SEPP) provides that the consent authority must take into consideration:

- *The design quality of the development when evaluated in accordance with the design quality principles set out in Schedule 4; and*

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

- *Whether the development enables the use of school facilities (including recreational facilities) to be shared with the community.*
The design quality principles of Schedule 4 and details of any proposed shared use of facilities with the community will be considered as part of the EIS.

Section 4.6.4 of the EIS responds to this clause by stating that the “*school is a new facility and community use of the school facilities is not available at this stage*”.

It is considered that the EIS has not addressed the requirements of the SEPP.

Council contends that social infrastructure such as new schools are a ‘once in a generation’ investment and therefore should allow shared community use after hours to make full use of what essentially is a community facility.

Council officers are aware that joint and shared use of school facilities is articulated in the Department of Education’s School Asset Strategic Plan and Community Use of School Facilities Policy, and is supported by the NSW Government, Greater Sydney Commission and the NSW Audit Office.

It is recommended that this needs to be integrated in the design proposal so that easy and legible community access and after-hours management of these shared facilities is programmed in the design. As a minimum there should be more detail on what is proposed to be shared (for example the sport fields, after-hours learning facilities and canteen) and formalised in a plan of management that allows this use.

Pedestrian Connections

Concern is raised with the lack of pedestrian access to the future school facility from the south of the subject site. The school catchment in terms of pedestrian access seems to be only to the north of the subject site. As a minimum, pedestrian access to the school grounds should be located to the southern boundary accessed from Ferntree Place. This will significantly increase the walkable catchment of the school and reduce dependence on car drop-offs.

Whilst it is acknowledged that there is an existing private residential development adjoining the southern boundary, an accessible link from Ferntree Place and the cul-de-sac at Second Avenue is also possible. In addition to a through site link this affords greater after-hours community access to the proposed play areas (refer to Figure 1 below).

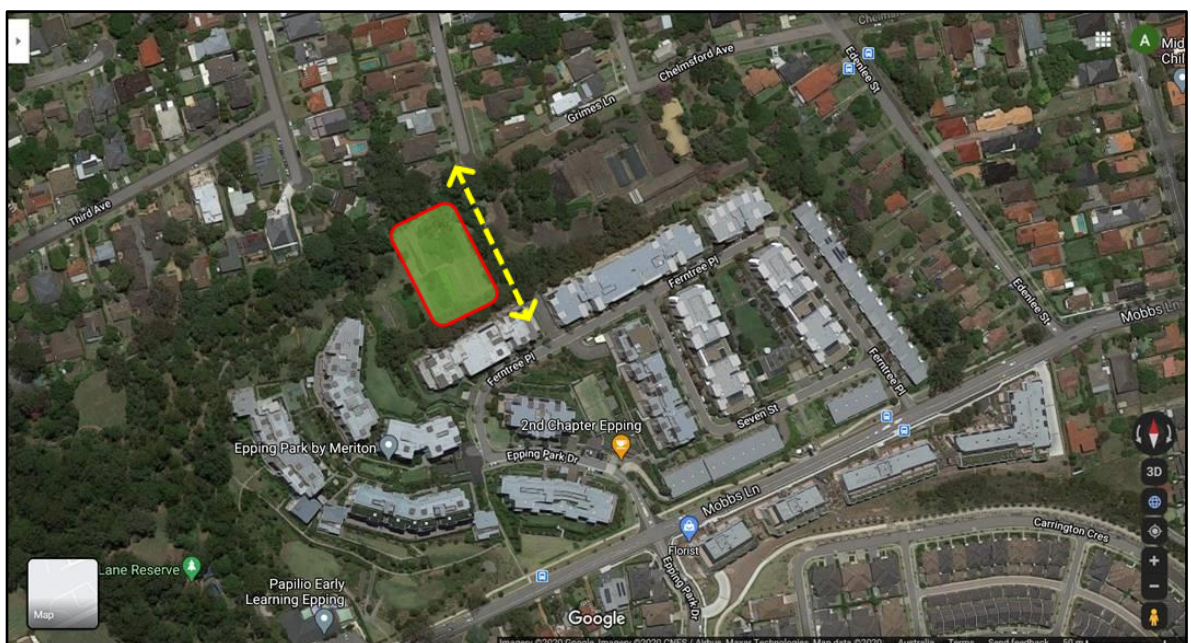


Figure 1: Potential pedestrian access from Ferntree Place increasing walkable catchment to school.

Figures 2 & 3 below indicate the Leichhardt Secondary School which allows such a connection for improved permeability and shared use of the playing field. Council officers recommend this approach be adopted in this proposed school.

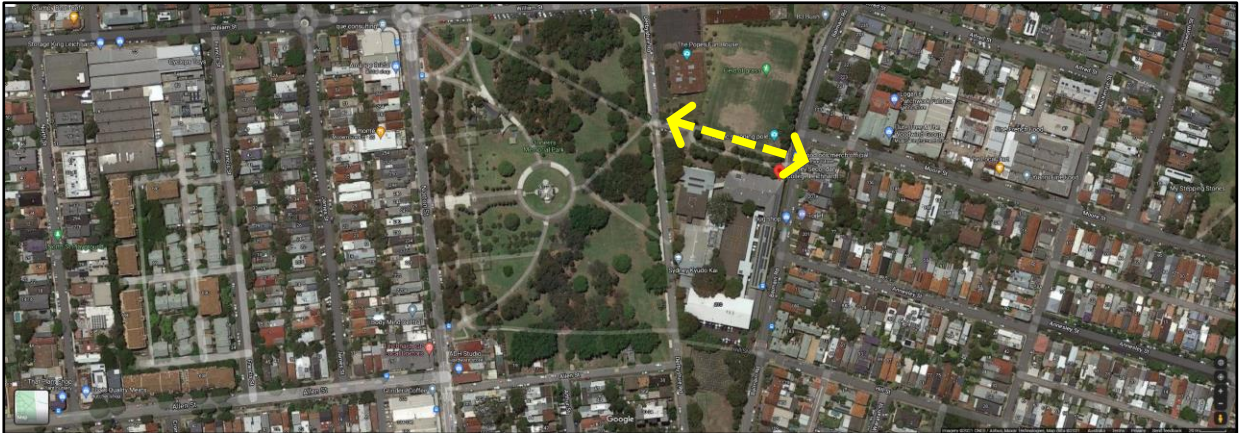


Figure 2: Leichhardt Secondary School has a cycleway/pedestrian link from Moore Street W to Balmain Road allowing permeability for the general public. (Source: [Google Maps](#))



Figure 3: Street View of publicly accessible pedestrian through link in Leichhardt Secondary School, NSW (Source: [Google Maps](#))

Open Space Provision

At the SEARs stage, Council outlined that the Social Impact Assessment (SIA) must “demonstrate that open space within the site will be sufficient for students to be able to meet these physical activity requirements” and explore a potential “shared use” arrangement with Council. Council requested that the shortage of playing fields also be addressed.

The SIA does not address how open space will be sufficient for students of the proposed development. It also does not address any potential ‘shared use’ arrangement with Council, nor on how the shortage of playing fields will be addressed.

Council therefore requests the following be appropriately addressed:

- A detailed assessment on how the provision of open space is sufficient for the proposed 1000 students, at capacity, noting that 10,000m², or a hectare of open space is required to meet these needs according to the DoE’s minimum of 10m² of open space per child.
- the option of having ‘shared use’ of the open space with Council.

Coordination with Epping West Public School

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.

ROAD DESIGN

No objections are raised in principle with the proposed extension of Grimes Lane. Any consent granted should incorporate conditions requiring the following:

- All works within the road reserve are to be designed and constructed in accordance with Council's Standards
- Works shall be inspected by Council's Civil Assets Team prior to the pouring of concrete or placement of asphalt.

TRAFFIC AND CAR PARKING

Car Park Design

The plans do not provide sufficient detail to confirm that the design of the proposed at-grade car park complies with the Australian Standards. Space 18 and 54 are of particular concern, as it appears that an additional 300mm clearance may not have been provided to the fence and the blind aisle extensions have not been provided. Furthermore, the car park does not include any provisions to turn around and may result in long reversing manoeuvres.

A detailed plan of the at-grade car park is to be provided to confirm that the design is satisfactory. The plans must show all details and dimensions such and is to ensure compliance with AS 2890.1, AS 2890.2 and AS 2890.6.

Grimes Lane

The general layout of Grimes Lane appears acceptable.

Confirmation of the provision and construction of footpath/s along Grimes Lane should be provided.

The proposed 'one-way' restriction will require TfNSW approval of a traffic management plan and also separate approval through the Traffic Committee process.

Pedestrian Links and Facilities

It is noted that Appendix B of the TIA shows the identified walking routes do not extend beyond Edenlee Street and Dunlop Street. This plan suggests that no additional crossing facilities are required.

Dunlop Street, Edenlee Street and Midson Road are within the 400m catchments as per Figure 3-2 of the TIA. As such, it is probable a significant number of parents and children will be crossing these streets particularly when active transport is being encouraged. As a minimum, additional crossing facilities need to be provided at these locations.

Further to this, the SEARs comments considered a pedestrian link between the school and the Epping Park Development to be critical and this needs to be included as part of the development. The proposed plans do not show this. This is discussed elsewhere within this submission.

All proposed pedestrian facilities including the pedestrian crossing in Grimes Lane will require separate approval through the Traffic Committee process.

Kiss and Drop Facility

Additional information should be provided to demonstrate that the kiss and drop facility is adequate to cater for the proposed development.

Bus Access

Clarification on the location and use of a bus pick up/drop off area for school excursions and the like is to be provided.

Works at Applicant's Expense

The construction of the traffic and road facilities are 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.

Traffic Related Conditions

It is noted that further assessment of the car park design needs to be undertaken before determination of the application. Notwithstanding the resolution of this matter, the following conditions are recommended for any approval granted.

Recommended conditions are as follows:

Prior to the release of a Construction Certificate

A splay extending 2m from the driveway edge along the front boundary and 2.5m from the boundary along the driveway in accordance with Figure 3.3 of AS2890.1 shall be provided to give clear sight lines of pedestrians from vehicles exiting the site. This shall be illustrated on plans submitted with the construction certificate and not be compromised by the landscaping, signage fences, walls or display materials.

Reason: To ensure pedestrian safety.

Prior to the release of a Construction Certificate

The applicant is to submit a separate application for the proposed line markings and signage in Grimes Lane and surrounding streets to Council's Traffic and Transport Services for consideration by the Parramatta Traffic Committee under Delegated Authority and 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 traffic facility and appropriate signage are to be paid for by the applicant at no cost to Council.

Reason: To comply with the Roads Act 1993.

Prior to the release of a Construction Certificate

Detailed engineering design plans are to be submitted to Council's Traffic and Transport manager for consideration by the Parramatta Traffic Committee and approval by Council of the following Traffic Facilities:

- 1. Raised Pedestrian Crossings in Grimes Lane at First Avenue and at Second Avenue included detailed design plans of the revised layout of Grimes Lane*
- 2. Pedestrian crossing facilities at the intersection of Edenlee Street and Chelmsford Avenue (Pedestrian Crossing or Refuge Island subject to consultation with Council)*
- 3. Pedestrian crossing facilities at the intersection of Midson Road and Chelmsford Avenue (Pedestrian Crossing or Refuge Island subject to consultation with Council)*
- 4. Pedestrian crossing facilities at the intersection of Dunlop Street and First Avenue (Pedestrian Crossing or Refuge Island subject to consultation with Council)*

The construction of the approved facilities 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 pedestrian safety.*

During Construction or Works

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 Construction or Works

Oversize vehicles using local roads require approval from the National Heavy Vehicle Regulator (NHVR). The applicant is required to submit an application for an Oversize Vehicle Access Permit through NHVR's portal (www.nhvr.gov.au/about-us/nhvr-portal), prior to driving oversize vehicles through local roads within the City of 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

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

Biodiversity Development Assessment Report (BDAR)

Council officers have reviewed the submitted Biodiversity Development Assessment Report (BDAR). The BDAR has not considered the proposed impact stated in the Bushfire Protection Assessment Report (BPAR). The BPAR states that the remaining Blue Gum High Forest (BGHF) patch (~0.18ha) is to be managed as an Inner Protection Area (IPA). This would require that the tree canopy is reduced to achieve a less than 15% cover and that the understorey is mown on an ongoing basis (as per Appendix A in the BPAR). Therefore, the impact on the BGHF patch is likely to be significant, noting that the aerial imagery indicates a dense tree canopy and that the understorey of this patch contains both native and exotic species according to the BDAR.

By considering the entire patch of BGHF in the BDAR assessment, this may require the relocation of the survey plots to appropriately sample the impact area within this PCT and may result in the requirement to offset biodiversity credits (e.g. the vegetation integrity score may be lifted). Consequently, the BDAR must be updated and consider the impact of all the proposed works.



Screen-print of BPAR - showing extent of proposed IPA (blue polygons)



Screen-print of map in BDAR showing that only a small section of the southern BGHF patch was considered in the assessment

In case the Bushfire Protection Assessment Report is updated to not treat the BGHF patches as an Inner Projection Area, a Vegetation Management Plan should be developed given BGHF is listed as a critically endangered ecological community under the *Biodiversity Conservation Act 2016*.

Tree Impacts and Landscaping

The Arboricultural Impact Assessment submitted with the application includes a tree management plan which should form part of any consent granted.

The concept landscape plan provided is considered satisfactory for the scale of the development. It is recommended that a detailed landscape plan be prepared for construction purposes at each stage of development and incorporates sufficient buffer landscaping to adjoining residential properties.

It is noted that the architectural plans only indicate the staging of buildings on the site. A staging plan for all works, including landscaping should be provided.

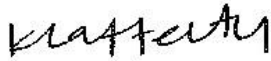
NEXT STEPS

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