

Department of Planning, Industry and
Environment
4 Parramatta Square, 12 Darcy Street
Parramatta NSW 2124

Our Ref NCA/8/2019

Contact Thomas Fernandez

Telephone 9806 5571

Email tfernandez@cityofparramatta.nsw.gov.au

27 Apr 2020

Dear Ms Cleary,

COUNCIL SUBMISSION
SSD 10383 – 2 Darcy Road, Westmead
Westmead Catholic Community Education Campus

Thank you for the opportunity to comment on the application for the Westmead Catholic Community Education Campus.

Council's response is included in this letter and attachments. We look forward to working with the Applicant and the Department to resolve Council's outstanding concerns.

The Application

The site is located at 2 Darcy Road, Westmead and is situated at the southern corner of the Darcy Road and Mons Road intersection, opposite the Westmead Private Hospital. Currently, the subject site comprises a primary school and two high schools, namely, Mother Teresa Primary School, Catherine McCauley Westmead and Parramatta Marist High School. Collectively, there are 2,767 students enrolled at these schools. There are three main car parks for staff provided on-site plus a small car park for executive staff. Collectively, there are 286 car parking spaces provided at the subject site.

The proposed development (the subject of this application) seeks to progressively increase the student population by an additional 1,680 primary school students and 200 children at the Catholic Early Learning Centre. Works that are proposed for the application include:

- A primary school to increase the student population by an additional 1,680 students, to provide expanded facilities for the existing Mother Teresa Primary

Contact us:

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

School on the site and to relocate the existing Sacred Heart Primary School at Ralph Street

- A new Parish Church
- A Catholic Early Learning Centre (fit-out within an existing building) to increase the capacity by an additional 200 children

A separate application has also been submitted to Council for a new on-site car park off Darcy Road at the north-east corner of the site to accommodate approximately 260 additional car parking spaces for staff across two above-ground levels and one basement level.

It is understood that the current State Significant Application is the first stage of a possible 3-stage Westmead Catholic Community project. Later stages will look at other potential changes to the adjacent High Schools with possible further increases in student populations. It is understood that long terms plans could see the site accommodate 6,000 students.

Westmead contains the largest concentration of health services in Australia and with the establishment of a major university campus complementing existing education services, the area is being established as a diverse and world-class innovation precinct. It is important that the nature and volume of supporting development such as the current proposal does not detract from the fundamental medical and health functions of the precinct.

The draft Westmead Innovation District Masterplan whilst not finalised reflects a significant amount of analysis in relation to the precinct and contains worthwhile principles that should be pursued. Council is in discussions with the Department of Planning, Industry and Environment (DPIE) to transfer components of it to a new Strategic Plan for Westmead.

Summary

The Council is supportive of the role that the Catholic Education Diocese of Parramatta plays in the growth of the City and welcomes improvements to education facilities in the Local Government Area. This includes the creation of new school places to meet increasing demand.

The concentration of activities on this site, however, has undesirable consequences that the Council is unable to support.

The site is accessed via Darcy Road only and lacks the finer grain residential road network that is usually associated with primary school sites. Similarly there are limited pedestrian

connections to the surrounding area, a lack of sports fields and limited access to active recreation facilities.

As there are no other options, students will be dropped off and picked up via Darcy Road which is already heavily congested. This increase in vehicular movements results in an unacceptable level of service to two adjacent intersections. The additional built form also results in the loss of key open space and playing fields to the detriment of future students and the broader community.

Given the impacts in relation to traffic, loss of open space and a lack of connectivity it is considered that the context of this site does not suit the proposed development model where four schools, a church and an early learning centre are collocated on the one site.

For these reasons, the Council formally objects to the current proposal.

Council welcomes an opportunity to work with the Catholic Education Diocese of Parramatta to explore options that would offset these problems. These include reducing proposed student numbers and the possibility of expanding student numbers at other sites to address population demands. As discussed in detail in the following sections, the connectivity of the site can also be improved through additional roads and/or shareways.

Key Issues and Concerns

Traffic

The State Significant Application includes traffic modelling for 11 intersections in the area. Of these, the intersection of Darcy Road and the Primary School Driveway is the most effected by the proposed development. The proposed development also has a significant effect on the intersection of Darcy Road and Bridge Road. The traffic from the development that is of most concern is that associated with the pickup and set down from the primary school as it has a high volume and is concentrated in a short period.

The level of service at the Primary School Site access will be F during the AM and PM peak after construction of the development (refer to the tables below obtained from the Applicant's Transport & Accessibility Impact Assessment (TAIA) prepared by The Transport Planning Partnership (TTPP) dated 19 March 2020). This will lead to queuing beyond the right and left turn bays into the site, which will disrupt traffic flow not associated with the school, which is unacceptable given the role of the medical and health services role of the Westmead precinct.

The State Significant Application also fails to provide information on how pedestrians crossing the primary school driveway at Darcy Road will be managed.

Table 7.5: Intersection Performance – AM Period

Intersections	Intersection Type	Existing		2023 Background Growth		2023 Background Growth + Dev		2033 Background Growth		2033 Background Growth + Dev	
		Average Delay	LOS	Average Delay	LOS	Average Delay	LOS	Average Delay	LOS	Average Delay	LOS
Darcy Rd – Site Access (Mother Teresa)	Priority (Stop)	13s	A	15s	B	9s ^(a)	A	19s	B	>100s ^(c)	F

Table 7.6: Intersection Performance – PM Period

Intersections	Intersection Type	Existing		2023 Background Growth		2023 Background Growth + Dev		2033 Background Growth		2033 Background Growth + Dev	
		Average Delay	LOS	Average Delay	LOS	Average Delay	LOS	Average Delay	LOS	Average Delay	LOS
Darcy Rd – Site Access (Mother Teresa)	Priority (Stop)	10s	A	11s	A	12s	B	14s	A	>100s	F

Similarly, the intersection of Bridge Road and Darcy Road deteriorates from a Level of Service (LoS) C to a (LoS) F in the AM and PM peak as a result of the proposed development.

The impacts of the level of service at these intersections is considered to be unacceptable. The scheme needs to be amended to address these significant impacts.

The draft Westmead Innovation District Masterplan includes a link from the Primary School Car Park direct to Bridge Road. This link would alleviate traffic flows at the two problem locations detailed above. Note that the link in the draft plan continues through the school site, which whilst not necessary from a traffic perspective helps to address concerns in relation to connectivity raised above.

An additional measure that could be undertaken would be to reduce the number of students at the primary school.

There are other intersections that deteriorate in future as a result of this development and other surrounding growth. However, for the other intersections there are other factors that apply. For example, the intersection of Hawkesbury Road and Alexandra Parade will be modified as part of West Metro. For other intersections the school traffic has a relatively small affect compared to traffic from other developments.

In regards to the pickup and set down for the Primary School, the TAIA states the following.

At the busiest time for drop-off and pick-up, it is estimated that there would be:

- In Year 2023:
 - Approximately 50 cars dropping off students in a 15-minute period (AM), and
 - Approximately 76 cars picking up students in a 15-minute period (PM).
- In Year 2033:
 - Approximately 128 cars dropping off students in a 15-minute period (AM), and
 - Approximately 194 cars picking up students in a 15-minute period (PM).

Similarly, applying a rate of two minute per car means that each bay could accommodate approximately 7.5 cars in a 15-minute period, and therefore, the 31 bays could accommodate a turn-over of approximately 233 cars.

Note that there is no calculation provided to detail how these numbers of cars picking up or dropping of in the 15 minute period is determined. The calculation of capacity (233 vehicles in 15 minutes) is considered to be accurate.

However, the TAIA also states the following in regards to the number of Primary School students arriving by car and the number of cars associated with this movement. These figures are considered to be more accurate than those provided above for the demand for spaces.

Table 7.1: Future Population Travelling by Car

School Type	Group	Future Population (Year 2023)	Future Population (Year 2033)	Percentage of Car Travel	2023 Future Population Travelling by Car	2033 Future Population Travelling by Car
Primary School	Staff	40	100	95.0%	38	95
	Student	420	1,680	89.9%	593	1,510
High School	Staff	166	166	87.6%	145	145
	Student	2,237	2,237	19.6%	438	438

Table 7.2: Future Traffic Generation (School Peak Periods)

School Type	School Group	2023 Future Population Travelling via Private Vehicles	2033 Future Population Travelling via Private Vehicles	Car Occupancy Rate	2023 Future Traffic Generation		2033 Future Traffic Generation	
					AM	PM	AM	PM
Primary School	Staff	38	95	1.0	29	4	71	10
	Student	593	1,510	2.12	210	238	534	606
High School	Staff	145	145	1.0	109	15	109	15
	Student	438	438	1.85	178	201	178	201

These figures also show that the number of cars for the pickup (606) exceeds the capacity of the pickup and set down area (given above as 233 in 15 minutes). This would result in queuing back on to Darcy Road that would extend beyond the left and right turn bays into the site. Note that there is no proposed management of the pickup and set down. This would mean that the parents would arrive in a very short period, and queue to enter the site. The road effectively would have to store hundreds of vehicles for over half an hour, twice per day. The subsequent queuing will be significantly worse if the proposed development proceeded.

The TAIA estimates that the net traffic increase as a result of the proposed development in 2033 is 864 and 925 vehicle trips per hour during AM and PM peak periods respectively as shown in the table below:

School Peak Period	Direction (In/ Out Movement)	Existing Traffic Generation via Traffic Surveys	Existing Traffic Generation from interview surveys	2023 Future Traffic Generation	2023 Net Change *	2033 Future Traffic Generation	2033 Net Change *
AM Peak	'IN'	593	433	525	+92	892	+459
	'OUT'	438	307	388	+80	712	+405
PM Peak	'IN'	160	348	439	+91	807	+459
	'OUT'	276	365	458	+93	831	+466

* The net change in traffic generation is based on the theoretical existing traffic generation.

Primary Schools that have a large population can function adequately if their catchment is over a small geographic area. This allows a large portion of the students to walk to and from the school. It also helps if there is a permeable road network with lots of route options for motorists to disperse the traffic. The proposed development has neither of these characteristics and is inherently flawed. It is considered that a number of smaller primary schools, dispersed over multiple suburbs would provide a satisfactory arrangement.

Control P.2 of Section 5.3.3.5 of the Parramatta DCP 2011 indicates that on-site parking shall be provided at the rate determined by the traffic impact statement having regard to the objectives of this clause. On this basis, the submitted Transport & Accessibility Impact Assessment report, prepared by The Transport Planning Partnership (TPPP) dated 19 March 2020, in support of the proposal estimates that the number of parking spaces required for each group on a weekday is as given in the table below:

Group	Opening Year - 2023	Stabilisation Year - 2033
CELC Staff ^(a)	14	24
Primary School Staff ^(b)	38	95
High School Staff ^(b)	144	144
Primary and High School Visitor/Parents ^(b)	103	133
Parish Church (weekday service) ^(c)	66	66
Total	365	462

Based on the justifications provided in the TAIA, this parking demand estimation is considered acceptable for the case.

Given that a new on-site car park with approximately 260 additional car parking spaces is proposed to be constructed off Darcy Road at the north-east corner of the site, the total parking provision would be in the order of 472 spaces which is more than the estimated parking demand for the Stabilisation Year 2033.

The TAIA states that the schools will progressively provide up to 208 bicycle parking spaces to achieve a modal shift target of 3-5% from private vehicle usage to active transport (i.e. walking and cycling) and public transport. This bicycle parking provision is considered adequate for the proposed development. It is noted that the Parramatta DCP 2011 does not provide bicycle parking rates for educational establishments and places of public worship.

The TAIA also mentions that suitable public transport strategies should be pursued by preparing and implementing a Green Travel Plan to encourage a modal shift from single-occupant private vehicle trips and influence the way people move to/from a site to deliver better environmental outcomes to encourage sustainable travel and reduce traffic and parking impacts within communities. Although Council supports this suggestion, the Green Travel Plan is unlikely to reduce the primary school pick up and set down enough to address the concerns raised.

The traffic conditions in Westmead are of significance to the Local and State government as the precinct includes Westmead Hospital and Westmead Children's Hospital. These two hospitals form the basis of the Westmead Medical Precinct supported by a private hospital, research institutes, a proposed University of Sydney campus and multiple ancillary medical uses. A large primary school in this precinct puts the expansion of the precinct, and the jobs that go with it, at risk due to the traffic it generates from parent pick up and set down in peak periods. Council is also concerned that traffic delays may also affect ambulance and emergency response times.

While the State government is investing heavily in public transport in this area, it is anticipated that with the growth in the suburb there will still be an increase in parking

and traffic associated with the development described above. Increased traffic congestion associated with the primary school could restrict the development envisaged for the area, which in turn could result in some of the new public transport services not being used to the extent that they otherwise would. Note that a large primary school in this location is unlikely to benefit significantly from the improved public transport.

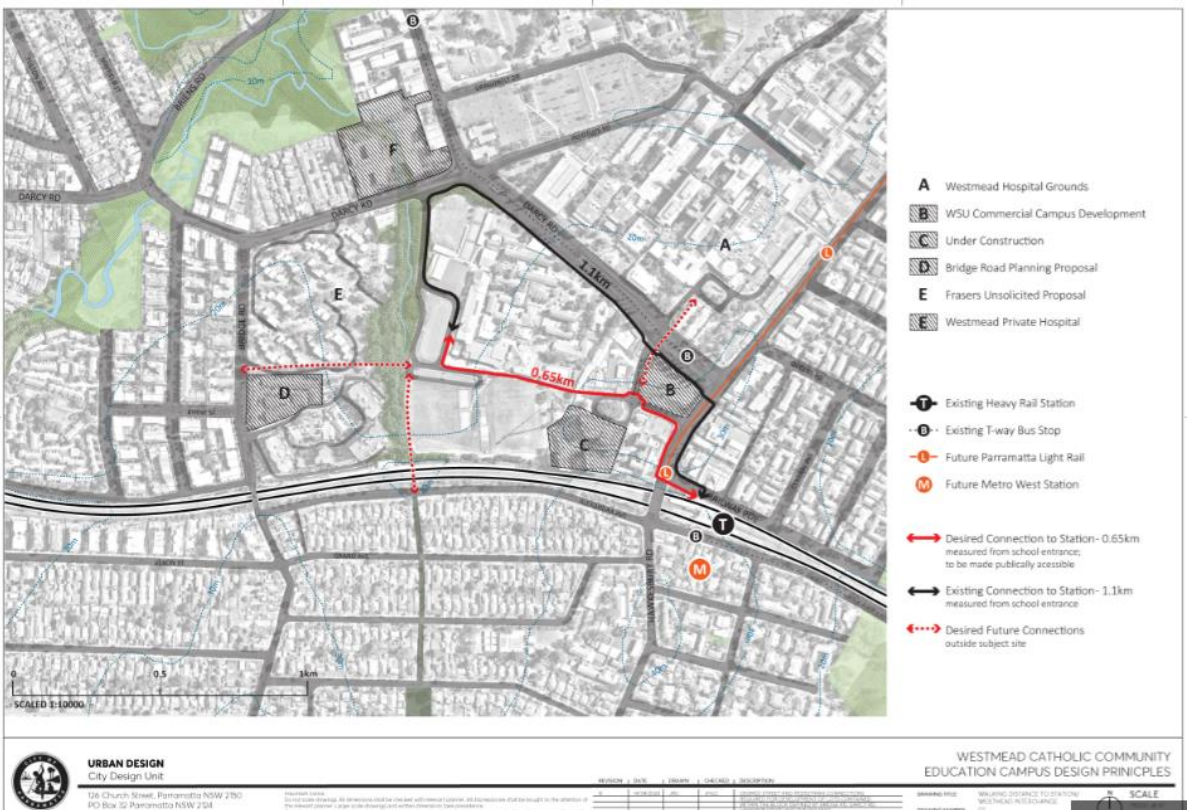
As outlined above, the Council objects to the proposal on traffic grounds.

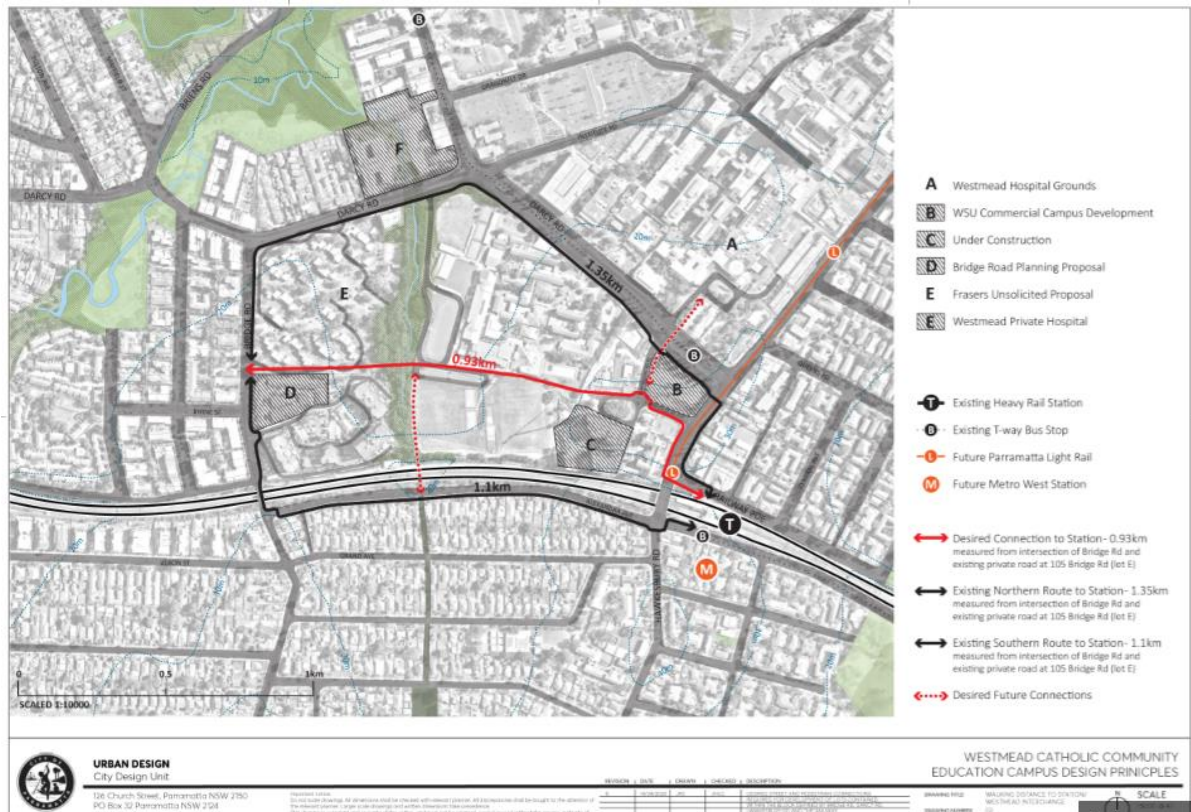
Connectivity – Urban Design

An alternative access to this site is required between the school buildings and the playing fields that can be connected to Farmhouse Road South to the east and Bridge Road to the west.

The street block in which the school is located is bounded by Hawkesbury Road, Darcy Road, Bridges Road and the railway. It is extremely large and not conducive to walking. With the introduction of the light rail and potentially the Metro it is essential that publicly accessible streets and/or shareways are introduced to reduce the size of this block and provide better connectivity to the public transport. The Draft Westmead Innovation District Masterplan sets out a vision for a connected precinct and includes a number of principles, included at Attachment 1, that highlight the importance of an appropriate street network.

Farmhouse Road South is a new street at the eastern end of this block that connects directly to Hawkesbury Road. On the western end there is the potential to connect to Bridges Road as redevelopment of these sites take place. The sketches included below illustrate the difference in distance and improved accessibility a new shareway can make. It should also be noted that the topography is such that a new path between the school buildings and the playing fields provides a more level access to Hawkesbury Road than via Darcy Street. It also has the potential to have canopy trees and provide a far less hostile environment than Darcy Road.





As outlined above, the Council objects to the proposal on lack of connectivity grounds.

Open Space and Recreation

Council has significant concerns regarding the loss of open space and active recreational facilities resulting from the proposed campus redevelopment.

Currently both Catherine McAuley and Parramatta Marist High access Council's sportsground facilities for their active sport and recreation needs at Ollie Webb Reserve (Parramatta), Jones Park (Parramatta), Binalong Park (Toongabbie), Doyle Ground (North Parramatta) and Arthur Phillip Park (Northmead) as they are unable to be catered for on the school site.

The current site incorporates 6 x multi-use courts and 1 x junior sportsfield; however, the proposed development results in the loss of the junior sportsfield and a reduction of multi-use courts from 6 to 2. This significantly reduces the availability of open space and active recreational opportunities within the site and a likely decreased capacity to accommodate the physical activity requirements of the up to 1,680 students (sought under this application, noting that the Applicant is planning subsequent stages).

Council's draft Community Infrastructure Strategy (CIS) has identified a lack of sporting fields and active recreational facilities in the surrounding area, with existing Council facilities, including the sports fields listed above being at or near capacity. Council is therefore unable to accommodate any increased demand created by the reduced open space and active recreational facilities within the campus as well as the additional student population.

The CIS also identifies the opportunity to partner with other levels of government specifically within educational institutions or the private sector to provide access to recreational facilities and open space to meet the short falls that Council cannot feasibly provide however this cannot be achieved when re-development of sites are reducing the availability of facilities and open space.

The Applicant's Social Impact Assessment has not addressed the impact of the loss of open space and recreational facilities nor how this impacts upon the ability of students to be able to undertake adequate levels of physical activity, particularly in the context of the limited capacity of nearby Council open space and recreational facilities.

As outlined above, the Council objects to the proposal on loss of open space grounds.

Supplementary matters to be addressed by the Applicant and/or the Department

Zoning & Permissibility

The subject site is currently zoned SP2 Educational Establishment, meaning that a 'place of public worship' is not permitted within the zone. It is acknowledged that the applicant has defined the place of public worship as an 'ancillary use'. Per the Planning Circular PS 13-001, *if a component serves its own purpose, it is not a component of the dominant purpose but an independent use on the same land. It is a dominant use in its own right. In such circumstances, the development could be described as a mixed use development.* That is, it is not ancillary.

Given that the church does not rely on the school for its operation, operates independently on weekends, and is managed separately to the education uses, there is an argument to be made that the use is a dominant use in its own right and would not be permissible.

However, given the objectives of the zone and the nature of the uses proposed the Council would not object to the Department using its powers under the state significant development system to allow this element of the scheme should it feel that it is appropriate to do so.

Accessibility

As discussed in detail above the proposal fails to connect the site into the wider Westmead area. This exacerbates access issues. A new thoroughfare would greatly reduce the distances to the transport hubs towards Hawkesbury and Darcy Roads, including the majority of buses, the train station and future Parramatta Light Rail.

All aspects of the public domain design must be delivered according to the requirements of the Australian Standards and best practice universal design. The applicant is obligated to provide a fully compliant detailed universally accessible design. Any proposed thoroughfare should take into consideration the Australian Standards including those relating to disability. Relevant standards would include the suite of AS1428 that provides details on continuous accessible paths of travel. The objective of these standards is to provide manageable pathways for persons with variable abilities.

Pathways with a gradient of less than 1:20 and cross falls no greater than 1:40 is recommended as it provides the best outcome with the largest percent of the population able to traverse the path.

The pathways should connect accessible buildings, facilities and spaces including the transport stops, parking areas including any accessible passenger loading areas, drop off zones, and the public streets and footpaths surrounding the site.

Further consideration should allow for the installation of rest points drinking fountains and seating along the pathways.

Biodiversity & Creek Riparian Corridor

Priority weed species and weeds of national significance have been identified within the adjacent riparian corridor containing Swamp Oak Floodplain Forest Endangered Ecological Community (EEC). To ensure the removal of weeds, offset tree removals throughout the site and to improve overall ecological integrity of the EEC, a Vegetation Management Plan should be prepared and implemented within the adjacent riparian corridor. This document is to be submitted to Council for review prior to any determination.

Stormwater Engineering

As previously raised in our SEARs submission water quality of stormwater discharges from the site should with Council's DCP 2011 and be modelled using 'MUSIC' or similar software. This information has not been provided.

Council strongly prefers integration of the WSUD systems into the landscape with design elements such as deep soil, bio-swales, wetlands and the like in preference to 'end-of-pipe' proprietary water treatment devices. From the information provided it would appear

that the Applicant has chosen tank containing 'Stormfilter' proprietary devices as the only approach to water quality management. (Water Management Plan and Civil Drawings). Given the size of the site, there is sufficient opportunity to design the landscape to incorporate WSUD, and this should be pursued.

Environmental Health

Matters relating to contamination, acoustic mitigation and waste management have been adequately addressed by the EIS. Conditions of consent relating to compliance with reports or further work required as the project continues are required.

A new Hazardous Materials Survey is required as the current report is dated 2016, and is considered to be out of date.

Insufficient information has been provided in relation to food storage areas to enable an assessment. Conditions of consent could be used to address this issue.

Development Contributions

Based on the Capital Investment Value document provided by the Applicant, which includes a summary of estimated costs, the development is valued to cost approximately \$80,474,245. The land is located within the 'outside CDB development contributions plan', therefore, a 1% levy is required. Local contributions = **\$804,742.45**.

It is noted that the Applicant is seeking an exemption from the payment of development contributions. The relevant contributions plan does not provide for any such exemptions and as such, a condition for the provision of contributions should be included on any consent.

Consultation with Councillors

Given the limited period of time given to Council to respond to this development, it has not been possible to formally refer this submission to a Council meeting for endorsement by our elected members. Councillors, however, were provided with an opportunity to comment on the proposal and to review a draft of this submission.

Comments received from Councillors align with the technical responses made by officers in the preceding sections of this submission. However, given the timeframe provided for a response the Council's submission only focuses on key areas of concern. For completeness, a summary of concerns raised by Councillors is provided at Attachment Two to this submission which should also be addressed by the Applicant and the Department.

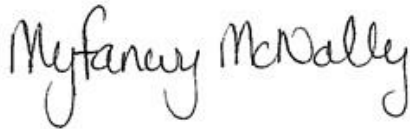
Conclusion

The Council understands that this application is the first of three stages of future development for the broader school site. The Catholic Education Diocese of Parramatta should be more transparent with these ambitions. This would allow the Department to consider how the current application fits with the proposed later stages of development, which are likely to exacerbate the concerns raised above.

Council appreciates the opportunity to comment on this application and looks forward to further consultation on this matter.

Should you wish to discuss the above matters, please contact me direct on 9806 5447 or at mmcnally@cityofparramatta.nsw.gov.au

Yours sincerely



Myfanwy McNally
City Significant Development Manager