

6 September 2021

218316

Ms Aditi Coomar  
Team Leader  
Social and Other Infrastructure Assessments  
Department of Planning, Industry and Environment  
4 Parramatta Square  
Parramatta NSW 2150

Dear Aditi,

## **WESTMEAD CATHOLIC COMMUNITY EDUCATION CAMPUS (SSD 10383) RESPONSE TO ADDITIONAL INFORMATION AND DESIGN AMENDMENTS**

This letter has been prepared by Ethos Urban on behalf of the Catholic Education Diocese of Parramatta (CEDP) to respond to the Department's Request for Information (RFI) dated 19 May 2021, including detailed comments and questions set out in subsequent correspondence dated 3 June 2021 and 4 June 2021, relating to traffic and transport and open space, respectively.

It also sets out the design amendments that have been made to respond to the issues raised, as well as other changes that have occurred in response to authority concerns since the application was originally exhibited. In doing so, it details the development for which approval is now sought. As outlined in this letter, the proposed amendments are minor in nature and key elements of the design, as well as the associated environmental impacts, remain largely unchanged. There is no impact to student or staff numbers, no change to the size or area of the buildings, no change to the quantum of outdoor space proposed and no change to tree removal or retention.

This letter should be read in conjunction with the following attachments:

- Transport and Accessibility Impact Assessment prepared by TTPP including Green Travel Plan prepared by Frank Turquoise (**Attachment A**);
- Revised Architectural Drawings and Design Report prepared by Alleanza Architecture including Open Space Calculation Diagrams (**Attachment B**);
- Revised Landscape Drawings and Design Report prepared by Ground Ink Landscape Architects (**Attachment C**);
- Revised Civil Drawings and Civil Design Report prepared by Northrop (**Attachment D**);
- Open Space Response Table prepared by Ethos Urban (**Attachment E**); and
- SIDRA Modelling Calibration and Validation Report prepared by TTPP (**Attachment F**).

## **1.0 Background and Summary of Design Changes**

An Environmental Impact Statement (EIS) for State Significant Development Application (SSD) SSD-10383 for the redevelopment of the Westmead Catholic Community (WCC) was publicly exhibited for a period of 28 days, ending on 29 April 2020. Approval was sought for:

- A primary school with capacity for approximately 1,680 students, to provide expanded facilities for the existing Mother Teresa Primary 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); and
- Landscaping.

In total, 16 submissions were received during the original public exhibition period. A Response to Submissions package was submitted to the Department in September 2020. Over the past year, several more RFIs have been

received from the Department, primarily relating to traffic and transport and open space. There has also been ongoing consultation with agencies, including the Department, Transport for NSW (TfNSW) and City of Parramatta Council (Council).

Most recently, a RFI was received on 19 May 2021 relating to traffic and transport and open space. In response to this RFI, as well as comments received during subsequent consultation with agencies, the following minor design changes have been made to improve pedestrian safety and traffic conflicts:

- Modification to the Darcy Road – Mother Teresa (main site access) intersection;
- Modification to Darcy Road – Catherine McAuley (approved multi-storey car park) intersection;
- Upgrade to the existing pedestrian connection, within the site at Farmhouse Road; and
- Repositioning of the Parish Church to accommodate the requested changes to the Darcy Road – Mother Teresa intersection.

In addition, the following amendments have been made over the course of the project, and are addressed in this letter for completeness:

- Provision of new and expanded Out of School Hours (OOSH) care facilities to accommodate additional students on the campus; and
- Removal of the primary school pick-up and drop-off area from the SSD scope of works, noting that these works have been carried out separately as Complying Development under *State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017*.

Based on these changes, the description of the development for which approval is now sought has been revised, as follows:

- A primary school with capacity for approximately 1,680 students, to provide expanded facilities for the existing Mother Teresa Primary School, expanded Out of School Hours care facilities 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);
- Landscaping.

Despite these changes, it is important to note that the development remains fundamentally the same when compared to the development that was originally exhibited. There is no change to student or staff numbers, no change to the size or area of the buildings, no change to the quantum of outdoor space proposed and no change to tree removal or retention. As a result, the development will continue to support the growth of the Westmead precinct and the demand for education facilities, and remains consistent with the objectives of the draft Westmead Place Strategy 2036.

The following sections of this letter provide a response to the RFI, a description of the proposed amendments to the development, and an assessment of the environmental impacts arising from the proposed changes.

### **1.1 Approval of Early Works DA (DA/241/2020)**

Since the exhibition of the SSD, the Sydney Central City Planning Panel has approved the Early Works DA on the site. The DA was approved on 2 November 2020. Consent was granted for:

- Demolition of the existing Brothers residents building;
- Removal of 35 trees;
- Construction of a new three-storey car park for 260 vehicles;
- Landscaping; and
- Pedestrian access upgrades.

Works are yet to commence on the site.

## 2.0 Response to Request for Information

### 2.1 Traffic and Transport

TTPP has prepared a revised Transport and Accessibility Impact Assessment. The revised Assessment and associated appendices are provided at **Attachment A**. A response to each of the questions and comments raised by the Department, Council and TfNSW is provided at Tables 1.2 – 1.4 of the Assessment.

In response to commentary provided during consultation with TfNSW, additional mitigation measures were proposed to improve pedestrian safety and respond to the traffic impacts of the application. Concept designs were prepared for the Darcy Road – Mother Teresa and Darcy Road – Catherine McAuley intersections. A Road Safety Audit (RSA) was subsequently undertaken on the concept designs. The changes recommended by the RSA were generally minor for the Darcy Road – Catherine McAuley intersection. For the Darcy Road – Mother Teresa intersection, the RSA has resulted in several changes to the concept design to ensure the safe operation of the intersection. We note that TfNSW has provided in-principle support for the proposed designs. TfNSW have also provided in-principle support confirmation that CEDP should not be responsible for any changes to the Hawkesbury Road – Railway Parade intersection.

To accommodate the changes to the Darcy Road – Mother Teresa intersection, some minor changes are required to the site entry and location of the Parish Church, as described in **Section 3.3**.

The revised Transport and Accessibility Impact Assessment also details changes that have been made to improve pedestrian access and safety at the site's main entrances. As requested by Council, an upgraded pedestrian connection is proposed within the site at Farmhouse Road (refer to **Section 3.2**). This new access will improve east-west connectivity across the campus and will provide better pedestrian access to the Westmead train station.

Overall, the modelling and assessment has demonstrated that the proposal will result in no additional impact on the surrounding road network in 2023 beyond the forecast background growth. By 2033, it is projected that there will be some impact to the intersections of Darcy Road – Site Mother Teresa and Darcy Road – Bridge Road – Coles Car Park. However suitable mitigation measures have been proposed to alleviate these impacts, and the delivery of significant public transport infrastructure improvements and pedestrian links for the precinct can also be reasonably expected to have a significant and positive impact on the performance of the road network.

### 2.2 Open Space

A response to each of DPIE's open space questions is provided in the Open Space Response Table at **Attachment E**.

Whilst there are some minor changes to the landscape design to accommodate the revisions to the Darcy Road entry and the relocation of the Parish Church, the design remains substantially the same. It is also important to note that there are no changes to the design of the primary school open space, or the quantum of open space per child.

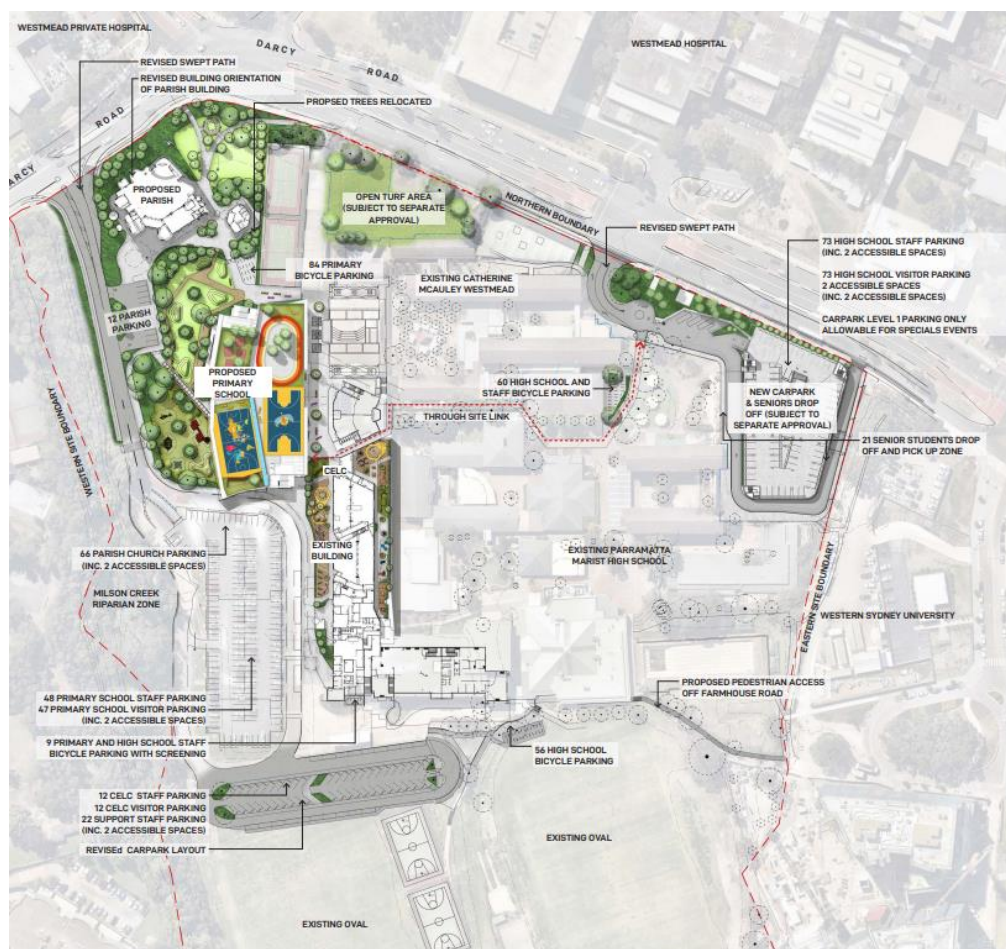
As outlined at **Attachment E** and in previous RFI responses, the proposed open space is considered suitable in terms of quantity, design and amenity, and it will support the health and wellbeing of students.

### 3.0 Amendments to Proposed Development

The amendments to the proposed development are described in this section of the letter. They can be summarised as follows:

- Intersection and access amendments;
- Farmhouse Road pedestrian access upgrades;
- Repositioning of the Parish Church;
- Update and expansion of existing OOSH facilities; and
- Removal of the primary school pick-up and drop-off area from the SSD scope.

A revised site plan is provided at **Figure 1** for context.



**Figure 1 – Revised site plan**

Source: Ground Ink Landscape Architects

### 3.1 Intersection Amendments

### Darcy Road – Mother Teresa Intersection (Main Site Access)

This intersection is currently the main entrance into the school. In the future, following construction of the approved multi-storey car park, this will be the access point for the primary school, Parish and early learning centre.

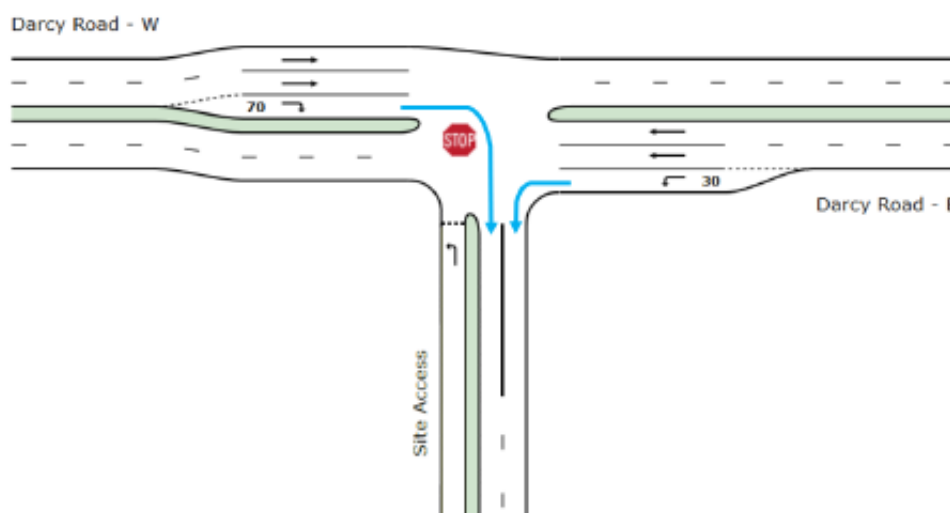
Modelling showed that traffic associated with the development resulted in the level of service for this intersection reducing to a LoS F. This is due to the increase in turning vehicle movements into and out of the site access driveway, as well as an increase in the through movement on Darcy Road due to background traffic growth. The

worst performing movement would be the right-turn movement into the site, which determines the intersection's overall service rating.

A mitigation measure to reduce the delay for the right-turn movement would be to provide a second exit lane on the south approach as shown in **Figure 2**. A second exit lane (turning left into the site) would provide the right-turn movement with a travel lane separate to the left-turn movement into the site access. This would allow the turning movements into the site access to occur simultaneously. Therefore, the delay for the right-turn movement would be reduced since this movement would no longer be required to give-way to the opposing left-turn movement. A sensitivity test of this measure indicates that the intersection level of service would be improved to LoS C (40 seconds average delay). In this scenario, the average queue length for the right-turn movement would be 19m.

The concept design has been subject to a RSA and has been reviewed by TfNSW. TfNSW has provided support for the proposed intersection design.

The widening of the site entry road to accommodate the second exit lane has resulted in the Parish Church being repositioned, as described in **Section 3.3**.



**Figure 2 – Concept design for Darcy Road – Mother Teresa intersection**

Source: TTPP

### **Darcy Road – Catherine McAuley Intersection (At Approved Multi-Storey Car Park)**

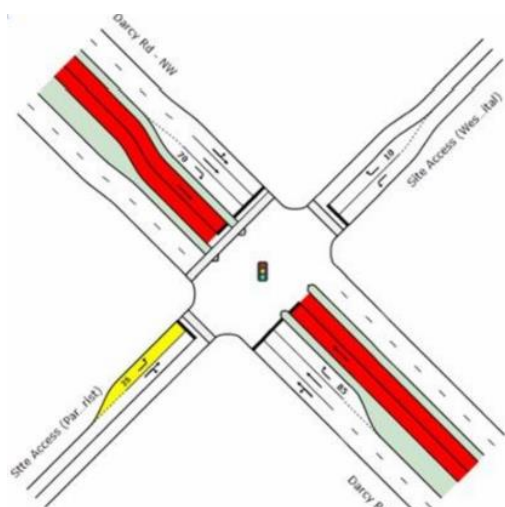
This intersection currently operates as the entry / exit from the high schools car park. In the future, it will be the exit point from the approved multi-storey car park and high school pick-up and drop-off.

Modelling showed that this intersection would operate at LoS B or better in the future scenario. Nevertheless, TfNSW advised that they would not accept a significant reduction in green time for the Darcy Road main carriageway.

An alternative site access layout has been designed to achieve the same (or similar) green time for Phase A (the Darcy Road T-way movement). This arrangement includes a dedicated left-turn lane on the south-west approach of the intersection (site exit approach) to be provided as a 25m short lane. The concept layout of this intersection arrangement is shown at **Figure 3**.

The concept design has been subject to a RSA and has been reviewed by TfNSW. TfNSW has provided support for the proposed intersection design. The new concept design for this intersection differs from the design that was approved by the Sydney Central City Planning Panel under the Early Works DA (DA/241/2020). Options for implementing the revised design are discussed further in **Section 4.2**.



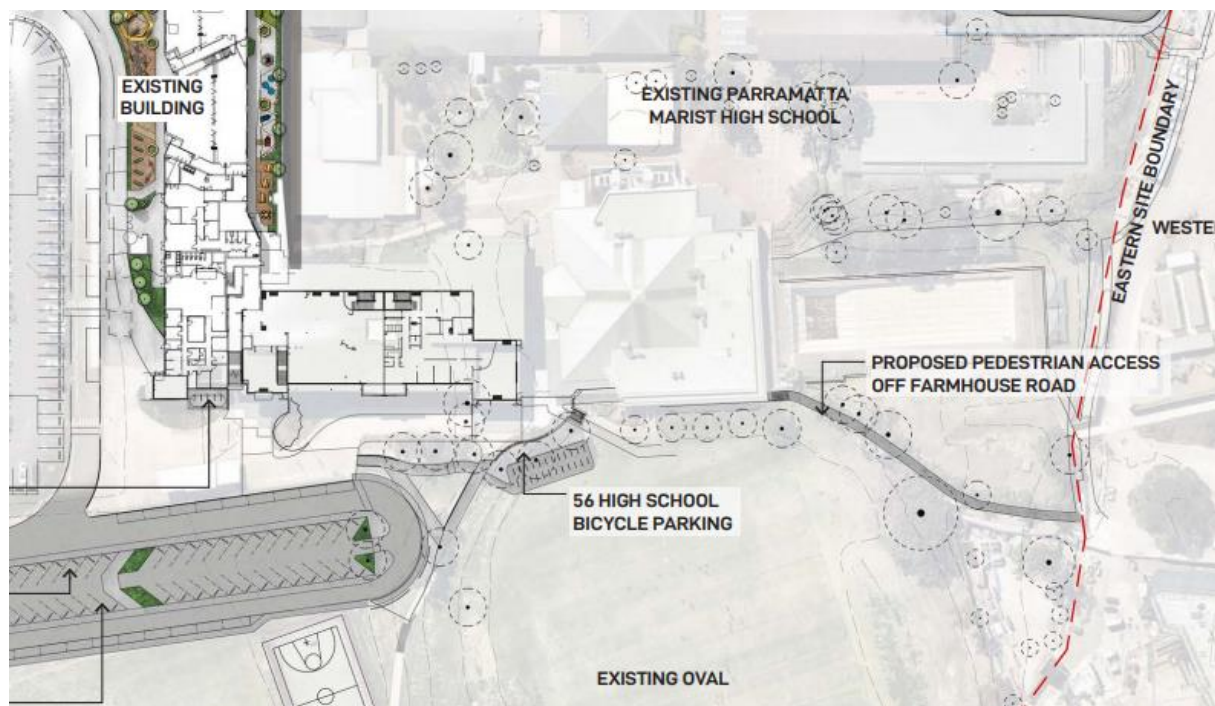


**Figure 3 – Concept design for Darcy Road – Catherine McAuley intersection**

Source: TTPP

### 3.2 Farmhouse Road Pedestrian Access

In response to comments from Council regarding the need for improved east-west connections into and through the campus, an upgraded pedestrian link is proposed between the WCC site and Farmhouse Road (refer to **Figure 4**). This will form the second main pedestrian access on the east side of the WCC site. The link will provide a more direct connection for students and staff walking to and from the site from the east and south-east. Having consideration for existing and future residential development in the Westmead Precinct, as well as existing and future transport connections, the upgraded Farmhouse Road link will significantly enhance site accessibility and permeability.



**Figure 4 – Upgraded pedestrian connection to Farmhouse Road**

Source: Ground Ink Landscape Architects

### 3.3 Repositioning of the Parish Church

The proposed changes to the location of the Parish Church, including associated parking and landscaping amendments, are discussed below. Notwithstanding the repositioning of the Church, the following elements of the design remain unchanged:

- No changes are proposed to the layout, gross floor area or height of the Parish Church;
- No changes are proposed to tree removal or retention, or proposed tree canopy coverage;
- No changes are proposed to the quantum of open space per student for the primary school;
- No changes are proposed to the quantum of car or bicycle parking; and
- No changes are proposed to the intent of the landscape design or site layout.

#### Parish Repositioning

To facilitate the amendments to the Darcy Road – Mother Teresa intersection, the Parish Church needs to be repositioned. The original and proposed location of the Parish Church is shown at **Figure 4**. The Parish Church is proposed to be moved slightly to the east (by up to 8m) and will be rotated slightly clockwise (by 16 degrees). The Cross structure is also proposed to be relocated to align with the reorientated Church.

Despite the proposed adjustment, we note that there are no changes proposed to the layout, gross floor area, capacity or height of the Parish Church. Further, there are no changes to access or waste management arrangements as a result of the proposed relocation.



**Figure 4 – Overlay of original and proposed Church location**

Source: Ground Ink Landscape Architects

## Car and Bicycle Parking

As noted above, there are no changes proposed to the number of car or bicycle parking spaces. However, several minor design changes have been made to accommodate the relocation of the Church, to respond to the recommendations of the RSA and due to ongoing design development. The changes are shown in **Figure 5** and comprise:

- Reconfiguration of the Parish car park to improve access and safety, with passengers now having direct access to the pedestrian footpath;
- Reconfiguration of the bicycle parking area to the west of the sports courts to include the spaces that used to be located to the north of the primary school building; and
- Introduction of a trafficable porte-cochere for processional vehicles.



**Figure 5 - Original (top) and proposed (below) car and bicycle parking layout**

Source: Ground Ink Landscape Architects



## Landscaping and Tree Replacement

Whilst there have been some amendments to the site entry and landscape design to accommodate the new slip lane and subsequent repositioning of the Church, the fundamental components of the landscape design including accessibility and functionality surrounding the Church remain unchanged, including the pedestrian access points from Darcy Road.

As noted above, there are no changes proposed to the proposed number of trees to be removed or retained. With respect to replacement tree planting, it is noted that some of the replacement trees have been relocated in response to the new slip lane and the subsequent repositioning of the Parish Church and its associated impacts.

Some trees have also been relocated as a result of ongoing design development. For example, trees in and around the bicycle parking area have been relocated for maintenance and safety reasons, and the trees near the new Church pick-up and drop-off have been relocated to improve sightlines. However, these trees have been replaced elsewhere in the landscape. Overall, there is a small increase in the number of trees being planted, with four (4) additional trees now proposed to the east of the primary school building. As a result, there is minor (1%) increase in tree canopy coverage. This is summarised in **Table 1**.

**Table 1 – Summary of tree removal and replacement**

Component	Original Proposal	Amended Proposal
Trees to be removed	27	27
Trees to be retained	7	7
Proposed number of replacement trees	126	130
Proposed canopy cover	25% of the development site	26% of the development site

### 3.2 Upgrade of Existing Out of School Hours Care Facilities

CEDP currently operates an OOSH facility on the campus. OOSH will continue to be provided on the site, with new facilities to be provided as part of the primary school building.

The OOSH will primarily be operated in classrooms and open space at ground level, and an office space is provided for OOSH administration. The OOSH facility is proposed to operate from 6.00am-8.45am and 2.45pm-6.30pm, with maintained provision during school holidays.

The OOSH has been designed to accommodate up to 672 students. The number of OOSH staff is proposed at a rate of 1 staff member per 10 students.

### 3.3 Removal of Pick-up and Drop-off Area from SSD Scope

The originally exhibited proposal included amendments to the primary school pick-up (PU) and drop-off (DO) area. Following on-site consultation with Council, CEDP decided to bring these works forward to improve existing traffic issues in the precinct and access to the site. As a result, these works were completed in December 2020 as Complying Development under *State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017*. Therefore, these works no longer form part of the SSD scope.

Since it became operational in early 2021, the upgraded facility has resulted in significant improvements to traffic conditions at the existing site access driveway, with the turn right movement into the site now contained within the dedicated right-turn bay, and spare capacity within the right-turn bay.

Whilst the revised layout represents a reduction in the number of PU/DO bays compared to what was originally proposed (31 bays were originally proposed), the layout allows for more efficient set-down and pick-up and can accommodate the future peak period demand. In fact, the 26 PU/DO bays that have been provided can accommodate four (4) times the future site-generated demand.

## 4.0 Environmental Impacts and Additional Assessment

The exhibited EIS and initial Response to Submissions were supported by a range of technical documents, as identified in **Table 2**.

Where required, documents have been updated to address the amended proposal. The documents which have been updated are identified in **Table 2**. Additional assessment of these matters is provided in the following sections of this letter.

**Table 2 – Summary of original and revised documents**

Appendix	Impact on Original Report/Document	Resubmission Required?
<b>Original Submission Documents (March 2020)</b>		
CIV	Design is fundamentally the same. No significant cost changes	N
Architectural Plans	Changes required	Y – see <b>Attachment B</b>
Architectural Design Report	Changes required	Y – see <b>Attachment B</b>
SEARS	No changes	N
Survey Plan	No changes	N
Flora and Fauna Assessment	No changes to assessment or conclusions	N
Transport Report	Changes required	Y – see <b>Attachment A</b>
Landscape Report and Plans	Changes required	Y – see <b>Attachment C</b>
Arborist Report	No changes to tree removal or retention	N
Infrastructure and Services Report	No changes to assessment or conclusions	N
Construction Management Plan	No changes	N
Engagement Report	Whilst further stakeholder engagement has taken place, this is documented in the Traffic Report	N
Noise and Vibration Report	No changes	N
ACHAR	No changes	N
PSI	No changes	N
ESD	No changes	N
HIS	No changes to assessment or conclusions	N
Water Management Plan	No changes to assessment or conclusions	N
Civil Plans	Changes required	Y – see <b>Attachment D</b>
Geotechnical Report	No changes	N
Flood Statement	No changes to Church floor levels. No changes to assessment or conclusions	N
BDAR Waiver	No changes to tree removal and retention	N
Aeronautical Assessment	No changes. Assessment considered new primary school as the tallest structure	N
Operational WMP (Parish)	No changes to waste management arrangements or conclusions	N
Operational WMP (School)	No changes	N
BCA	No fundamental changes to Church design or ability to comply	N
Wind Assessment	No changes to assessment or conclusions	N
Fire Engineering	No fundamental changes to Church design or ability to comply	N
Structural Report	No changes to design or conclusions	N
Access Review	No fundamental changes to Church design or ability to comply	N
HAZMAT	No changes	N
SIA	No changes	N

Appendix	Impact on Original Report/Document	Resubmission Required?
Section 10.7	No changes	N
<b>Additional Response to Submissions Documents (September 2020)</b>		
Framework Travel Plan	Changes required	Y – see <b>Attachment A</b>
Learning and Play Environments Research Summary	No changes	N
Photomontages	No changes to scale, form or design of the Church	N
MUSIC Modelling	No changes to assessment or conclusions	N
Stormwater Engineering Statement	Changes required	Y – see <b>Attachment D</b>
Solar and Access to Daylight Analysis	No changes	N
Landscape Rehabilitation Plan and Vegetation Management Plan	No changes	N
Indicative Schedule of Community Uses	No changes	N

#### 4.1 Additional Assessment

The proposed changes are minor in nature and will not result in any significant changes to the key issues that formed part of the original environmental assessment. As noted above, the design amendments do not result in any changes to tree removal or retention, the number of car or bicycle parking spaces or the quantum of open space provided per student for the primary school.

As demonstrated below, the design amendments do not give rise to any additional environmental impacts beyond what was considered as part of the submitted EIS and subsequent RFI responses.

#### Consistency with Environmental Planning Instruments, Policies and Guidelines

The development, as proposed to be amended, remains consistent with key environmental planning instruments, policies and guidelines as detailed at Section 5.1 of the submitted EIS.

#### Built Form and Urban Design

The form and scale of the Parish Church is the same as originally proposed. The height, gross floor area, capacity and layout remaining unchanged. This will ensure that the Parish continues to sit predominately beneath the tree canopy, with the Cross extending above for wayfinding.

Further, the urban design principles which underpinned the original design continue to apply. The Parish Church continues to be located at the north-western corner of the site, closest to Darcy Road, to create a more defined 'gateway' for the WCC. In addition to this, the layout of the site continues to create intuitive connections between the new buildings and the existing school, allowing wayfinding to occur unconsciously and promoting connectivity with the existing school.

#### Tree Removal and Flora and Fauna Impacts

There are no changes to the number of trees to be removed and retained. Similarly, there are no changes to the number of trees being replanted and the tree canopy cover remains the same. As a result, the amended proposal will not result in any additional flora and fauna impacts.

#### Traffic and Accessibility

Traffic and accessibility are addressed in detail in the Traffic and Transport Impact Assessment at **Attachment A**. Overall, the modelling and assessment has demonstrated that the proposal will result in no additional impact on the surrounding road network in 2023 beyond the forecast background growth. By 2033, it is projected that there will be some impact to the intersections of Darcy Road – Site Mother Teresa and Darcy Road – Bridge Road – Coles Car Park. However suitable mitigation measures have been proposed to alleviate these impacts, and the delivery of

significant public transport infrastructure improvements for the precinct can also be reasonably expected to have a significant and positive impact on the performance of the road network.

The relocation of the Parish Church will have no impact on traffic and access, with no changes proposed to parking, capacity or operation of the Church. The alterations that have been carried out to the PU and DO area have improved access into the site and are capable of accommodating future demand. Finally, the operation of the OOSH has been considered as part of the traffic modelling at **Attachment A**.

### **Stormwater Management**

The relocation of the Parish has necessitated some changes to the civil design, as shown in the revised Civil Drawings and Civil Design Report prepared by Northrop at **Attachment D**.

However, the fundamental components of the civil design with respect to drainage, on-site detention and downstream impacts remain unchanged.

### **4.3 Consistency with Approved Early Works DA**

As discussed at **Section 3.1**, the design of the Darcy Road – Catherine McAuley intersection is proposed to be amended to respond to feedback from TfNSW.

The introduction of a 25m left-turn lane on the south-west approach of the intersection (site exit approach) results in an inconsistency with the design that was approved by the Sydney Central City Planning Panel as part of the Early Works DA (DA/241/2020).

We believe that there are several options available to implement this change, and we would welcome further discussion with the Department to determine the best approach. Potential options include:

- A condition could be imposed on the SSD under Section 4.17(b) of the EP&A Act, requiring the applicant to modify DA/241/2020. A clause 97 notice could then be issued to Council under the EP&A Regulation, removing this scope from DA/241/2020. The intersection works could then be approved and take place under the SSD consent, subject to further consultation with TfNSW and approval under Section 87 of the *Roads Act 1993*.
- The early works could progress as currently approved, and a condition could be imposed on the SSD requiring the intersection to be upgraded to reflect the proposed changes, prior to the issue of the OC for the Primary School.

The proponent is meeting with Council in the week commencing 6<sup>th</sup> September 2021. The amendments to the Darcy Road – Catherine McAuley intersection, and options to implement this change, will be discussed with Council.



## 5.0 Conclusion

The proponent and project team have considered the Department's remaining concerns relating to traffic and transport, as well as open space. A detailed response to all issues raised has been provided within this letter and the accompanying documentation.

In responding to and addressing the range of matters raised, the proposal has been refined pursuant to Clause 55 of the *Environmental Planning and Assessment Regulation 2000*. This letter sets out the amendments to the proposed design and provides further environmental assessment, where required.

We trust that the responses provided above will enable the Department to finalise their assessment of the SSD DA.

Please do not hesitate to contact me on the details below if you have any questions, or if you require any further clarifications.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'K. Tudehope'.

**Kate Tudehope**  
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