

Our Ref: DEC-PAR

24 August 2015

Ms Carolyn McNally
Secretary
NSW Department of Planning & Environment
GPO Box 39
SYDNEY NSW 2001

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Dear Ms McNally

**RE: PROPOSED PARRAMATTA SCHOOLS PROJECT, PARRAMATTA CBD
80-100 AND 175 MACQUARIE STREET, PARRAMATTA
REQUEST FOR SECRETARY'S ENVIRONMENTAL ASSESSMENT REQUIREMENTS
(SEARs)**

In accordance with Clause 3 of Schedule 2 of the *Environmental Planning and Assessment Regulation 2000 (EP&A Regulation)* and Schedule 1 (clause 15) of *State Environmental Planning Policy (State and Regional Development) 2011* (State & Regional Development SEPP), the NSW Department of Education (DoE) requests the issue of Secretary's Environmental Assessment Requirements (SEARs) for the proposed Parramatta Schools Project at Macquarie Street in the Parramatta CBD.

The proposal qualifies as a State Significant Development (SSD) as the Capital Investment Value (CIV) of the Project (at this early stage) is in the order of \$100 Million and in excess of the SSD threshold of \$30 Million for Educational Establishment projects. The purpose of this letter of request is to provide a preliminary environmental assessment and other supporting documentation to allow for the SEARs to be issued to facilitate the preparation of the Environmental Impact Statement (EIS) to accompany the SSD.

1. Background and Description of the Proposal

DoE proposes to redevelop and expand Arthur Phillip High School and Parramatta Public School into new state of the art education facilities to meet projected demand in the Parramatta City Centre. The redevelopment will provide the first multi-storey public schools in NSW and facilitate the new pedagogy of future focused learning with modern indoor and outdoor landscaped spaces reflecting the latest learning platforms and connections with the city centre community.

Arthur Phillip High School will have capacity to accommodate up to 2,000 secondary students and Parramatta Public School will have capacity to accommodate up to 1,000 primary students. The combined project is known as the Parramatta Schools Project. As stated, the CIV of the project is in the order of \$100 Million.

A Masterplan Study has been prepared by dwpl|suters in consultation with a Project Advisory Group (PAG) of key stakeholders in DoE. The PAG has formulated Educational Principles that

translate a vision for learning into a set of masterplan design considerations for learning environments. The Educational Planning Principles are to:

- Provide accessible and safe teaching and learning space designed for individualised, personalised and project based learning for the secondary school
- Provide a colourful, textural, sensory, accessible and safe teaching and learning environment for the primary school
- Provide digitalized learning spaces for creativity and innovation
- Maximise and diversify outdoor space to encourage activity and passive play
- Build community and identity and create a culture of welcome inclusion and belonging that reflects and respects diversity within the school's community
- Promote sustainability through the built and natural environment

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The Masterplan Study identifies and evaluates a range of masterplan options for the precinct layout of the schools across the two sites and for the building massing envelopes for each school. At this early stage the project is conceptual and a detailed design will arise from the short-listing of current architectural firms which have tendered for the project as well as the proposed invited design competition for the combined Parramatta Schools project. This is addressed in further detail below.

The current preferred conceptual and massing options are selected as best meeting the Educational Planning Principles and providing a manageable separation of primary and secondary each on their own site with compact multi-storey building forms that optimise the use of limited site areas, interface with the streetscape and surrounding properties, access, outdoor spaces and sustainability. Extracts from this Masterplan Study are appended to this request letter.

The Arthur Phillip High School redevelopment on the northern site (see **Figure 1** below) has a combined multi-level tower and lower level podium. The tower component of about 15 storeys will house the majority of the teaching and learning elements of the school and the podium will accommodate the more administrative and support type spaces together with a gymnasium and other potential shared spaces.

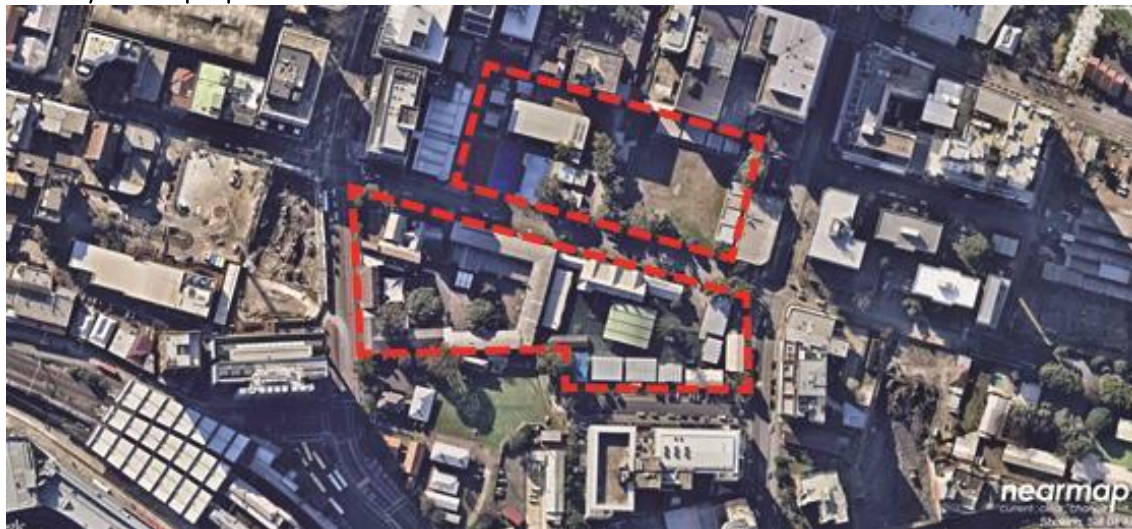
The areas throughout the entire building will accommodate large and medium sized spaces for outdoor learning and more passive type recreation spaces. The mid-tower level and roof levels (over the tower) and podium will accommodate some more active recreation spaces. The western end of the site will be dedicated as sports fields. The high school has a potential total gross floor area (GFA) of 31,600m².

The Parramatta Public School redevelopment on the eastern end of the southern site incorporates an 'L' shaped multi-level building of 4 storeys. The lower level will house the more administrative and support type spaces together with a Library and Hall. The upper levels will contain the majority of the teaching and learning elements of the school in the form of home bases together with staff support spaces.

The existing heritage building will contain some more administrative and support type spaces as well as accommodating any potential shared spaces. Outdoor learning spaces will be distributed throughout the upper levels adjacent the learning hubs. Ground level

outdoor passive and active recreation spaces will be distributed across the site with the more active spaces being located more towards the eastern end of the site. The primary school has a potential total gross floor area (GFA) of 8,090m². Extracts from this Masterplan Study are appended to this request letter.

This project is to be constructed by November 2018 as a part of the Department's Parramatta City Schools Strategy. The schools are intended to be operational Day 1, Term 1, 2019. Accordingly timing of the planning and construction processes is key to the effective delivery of the project.



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Figure 1 – Aerial photo of the site and immediate environs (source nearmap: July 2015)



Figure 2 – Preliminary Preferred Indicative Massing Option (source: dwp|suters)

Education Initiatives

Education is one of 9 key areas of focus under the NSW State Plan 2021, which includes the 'Innovative Schools Successful Students' initiative.

The proposal forms part of the State Government's 'Innovative Schools Successful Students' initiative. The NSW Government will invest \$1 billion from the 'Rebuilding NSW Schools Fund' to transform schools over the next 10 years. The \$1 billion investment is nominated by the Government as 'a once-in-a-generation opportunity under the 'Rebuilding NSW' banner, to provide 1,600 new or refurbished classrooms and learning spaces throughout the State'. This is in addition to the Government's \$2.7 billion investment into school facilities over the next four years.

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From a regional perspective, the State Plan's Western Sydney & Blue Mountains Regional Action Plan (2012) seeks to:

- Return Quality Services to the region in the form of public schools; and
- Improve education outcomes in the region.

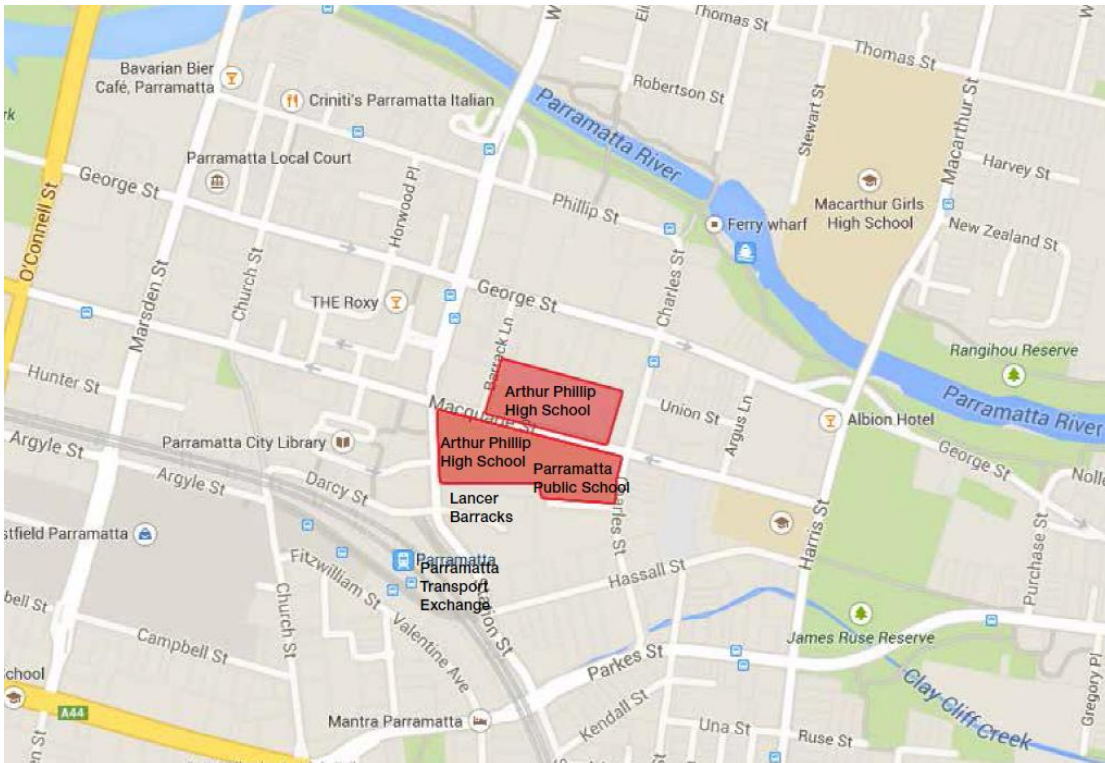
To achieve this, the NSW Government will:

- Encourage students to stay in school longer
- Increase green skills education and training opportunities
- Increase options for higher education
- Support students from culturally and linguistically diverse communities.

2. The Site

The site of the proposal is on the existing school sites to the north and south of Macquarie Street, between Smith and Charles Streets, Parramatta (80-100 and 175 Macquarie Street). The combined site area of the sites is about 3 ha, or 1.25 ha north of Macquarie Street (Arthur Phillip North site), and 1.75 ha south of Macquarie Street (approx. 1 ha for the Arthur Phillip South site and 0.75 ha for the Parramatta Public School site). See **Figure 3** for the sites' locations.

The site is surrounded by many existing and planned high density commercial and residential developments. The area is home to some large government agencies including the New South Wales Police Force, Sydney Water Corporation and Urban Growth NSW. The site sits near Parramatta Square (previously known as Civic Place) which is a civic precinct located in the heart of the city, adjacent to Parramatta Town Hall. The area includes a new mixed use redevelopment of the Parramatta Civic Centre, which includes buildings for commercial, residential and community use. A proposed new multi-storey facility for the University of Western Sydney will be developed across Smith Street adding to the education precinct nature of this area.

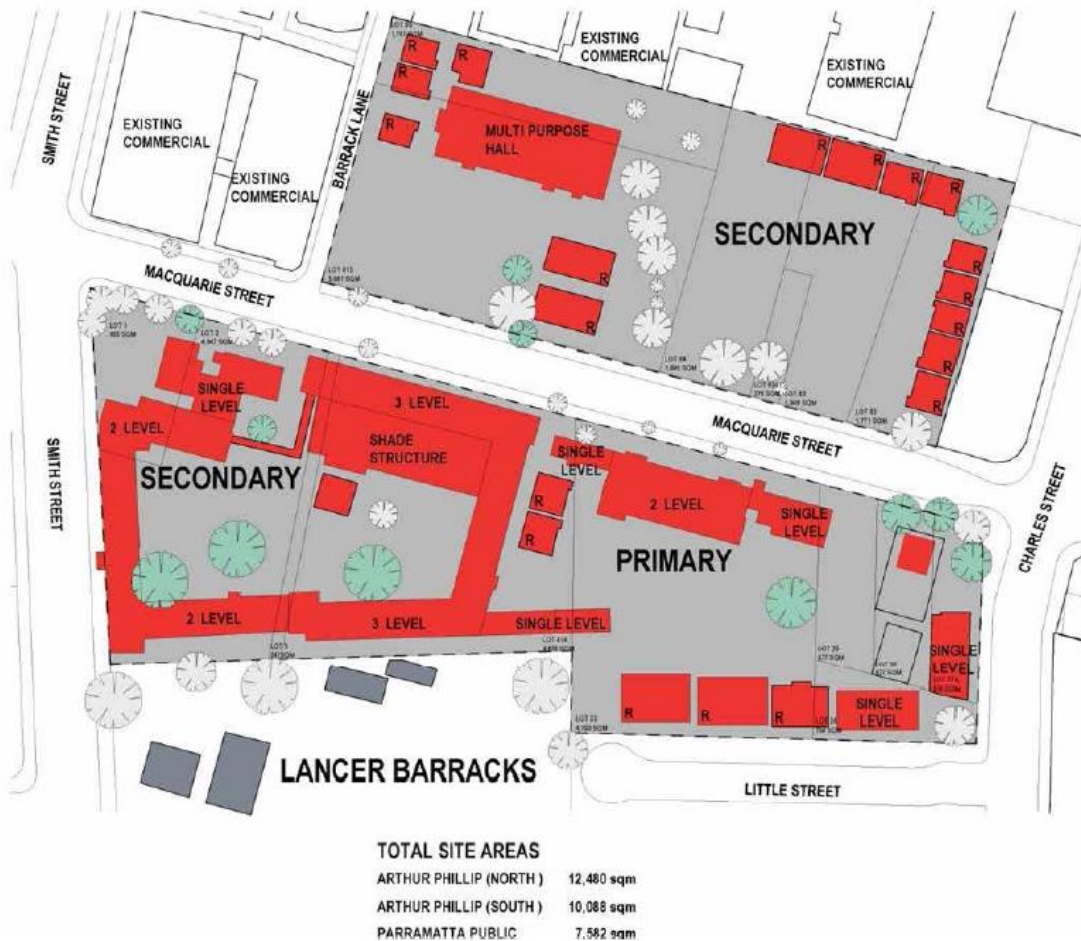


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Figure 3 – The school sites (source: dwp|suters)

The main section of Arthur Phillip High School is located on the corner of Smith Street and Macquarie Streets and adjoins Parramatta Public School on the south side of Macquarie Street. The remainder of Arthur Phillip High School is located on the Northern site (adjacent to 114-116 Macquarie Street) and is located on the corner of Barrack Lane and Macquarie Street. It consists of playing fields, a gymnasium and 16 demountable buildings. The Arthur Phillip High School was established in 1960 and is located in buildings that have been continuously used as a school since 1875. The existing Arthur Phillip High School has about 1,500 students.

Parramatta Public School is located on the eastern side of the southern site (175 Macquarie Street) bounding Charles Street. The existing Parramatta Public School has about 560 students.



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Figure 4 – Existing school sites, footprint and built form (source: dwp|suters)

Heritage & Archaeological

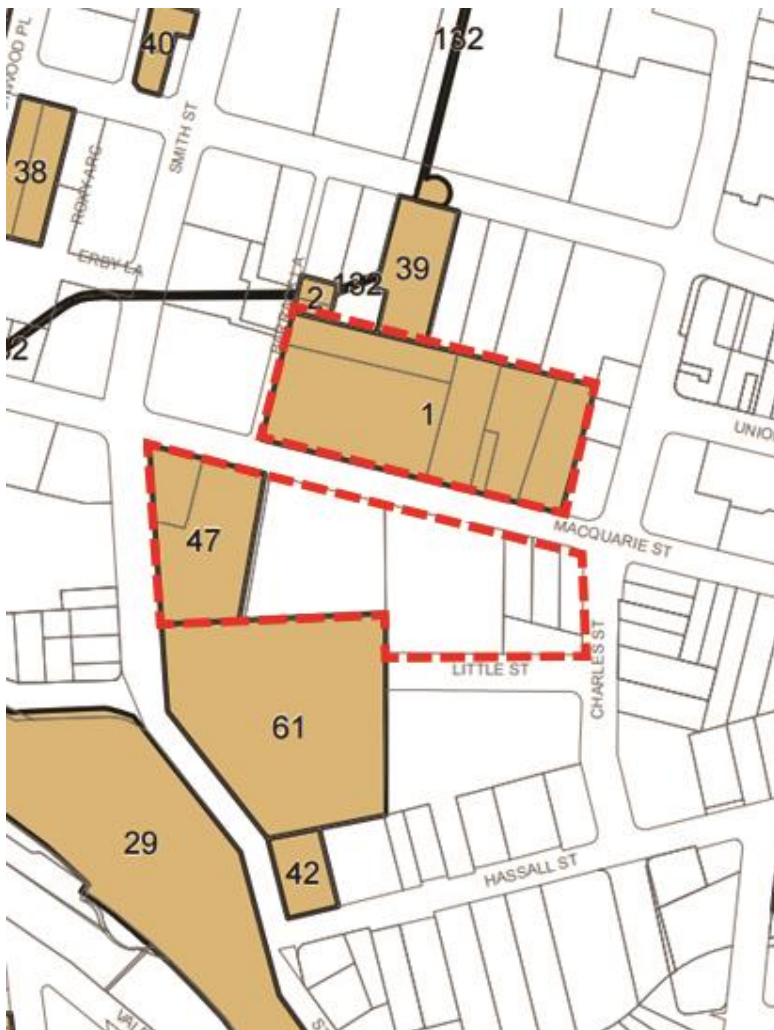
Based on information contained in the dwp|suters report the heritage and archaeological significance of the sites is set out below.

Arthur Phillip High School is listed on the NSW State Heritage Register. It also has a National Trust classification, is listed as having buildings of significance in the National Estate 1991 and is listed in the Parramatta City Centre LEP 2007 (as Items 1 and 47).

The LEP listing is as follows:

- Item 1 – Convict barracks wall – 80-100 Macquarie Street - Lot 65, Section 17, DP 758829 (State Item)
- Item 47 – Arthur Phillip High School and potential archaeological site – 175 Macquarie Street – Lots 1 and 2, DP 115296 (State Item)

Figure 5 below maps these listings.



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Figure 5 – Heritage Map Extract – Parramatta City Centre LEP 2007

The Arthur Phillip High School site was previously used as the convict lumber yard, prisoner's barracks and military barracks. The high school administration block was constructed in 1866 and a class room block in 1923. The Parramatta Public School site includes the Infant's School (built in 1923) and is representative of the school architecture of the time. The DoE School Heritage Register (Section 170 Register) has a separate entry for both Arthur Phillip High School and Parramatta Public School.

The following heritage items identified in the Parramatta City Centre LEP 2007 are adjacent to this site:

- Cottages at 1 and 3 Barrack Lane (rear of 100 Macquarie Street) – Item 2.
- Perth House property, Moreton Bay fig tree and potential archaeological site at 85 George Street – Item 39
- Lancer Barracks group, 2 Smith Street – Item 61

The cottages at 1 and 3 Barrack Lane and Perth House are also listed as items of state heritage significance on the NSW State Heritage Register, as is the movable heritage collection of Linden House at the Lancer Barracks.

The Parramatta City Centre Development Control Plan (DCP) 2007 requires that all development within the City Centre be informed and guided by the Parramatta Historical Archaeological and Landscape Management Study (PHALMS). The Arthur Phillip High School and Parramatta Public School site, spanning both sides of Macquarie Street, has been identified as Parramatta Archaeological Management Unit (PAMU) 2887.

3. Statutory Planning Context

Zoning and Permissibility

Parramatta City Centre LEP 2007 applies to the site. The site is zoned B3 – Commercial Core. Educational Establishments are permitted with consent in the B3 zone. In any case, under the *State Environmental Planning Policy (Infrastructure) 2007 - Infrastructure SEPP*, *Educational Establishments* are permitted in Prescribed Zones (which includes the B3 zone) in the event that the LEP would not permit the land use.

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Under the LEP, the following are permitted with consent in the B3 zone (with our emphasis):

*Advertisements; Business premises; Car parks (but only as required by this Plan or public car parking provided by or on behalf of the Council); Child care centres; Community facilities; **Educational establishments**; Entertainment facilities; Food and drink premises; Function centres; Hospitals; Hotel accommodation; Information and education facilities; Kiosks; Markets; Medical centres; Medical research and development facilities; Mixed use developments (not including residential accommodation); Office premises; Passenger transport facilities; Places of public worship; Public administration buildings; Public halls; Recreation facilities (indoor); Registered clubs; Retail premises; Roads; Serviced apartments; Sex services premises; Tourist and visitor accommodation*



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Figure 6 – Zoning Map Extract – Parramatta City Centre LEP 2007

Height and Density

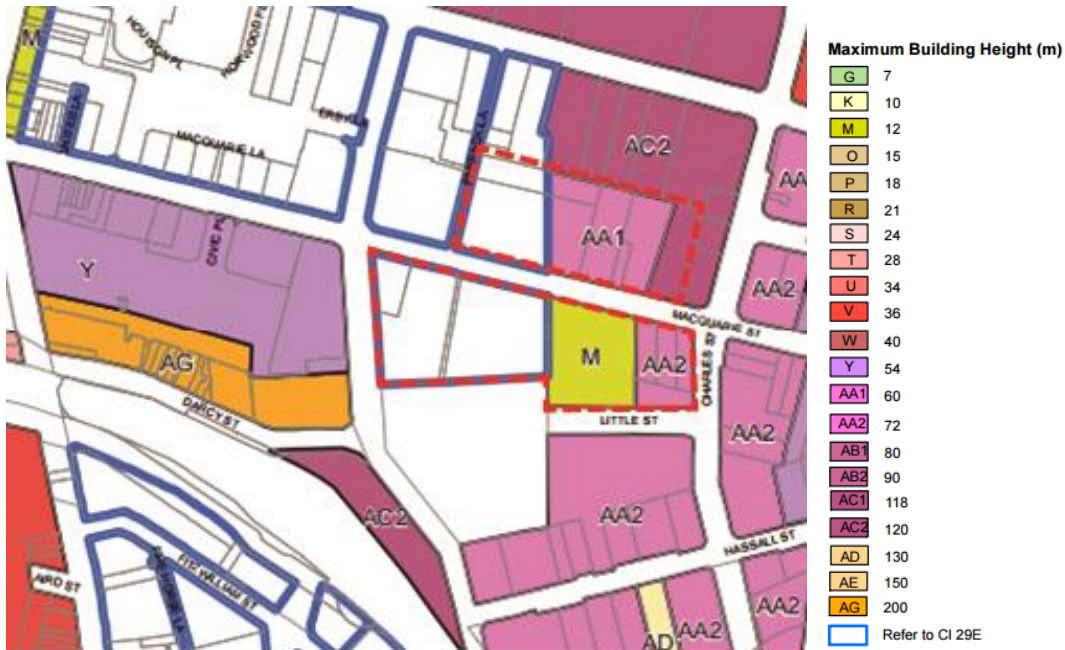
The land south of Macquarie Street has variable height controls including an area subject to no maximum building height, but which is subject to clause 29E of the LEP, as well as 12m and 72m from west to east. Similarly, part of the site north of Macquarie Street is also subject to clause 29E, and in part a 60m and 120m height limit, from west to east. This is shown in **Figure 7** over.

Clause 29E provides for sun access planes with the relevant DCP controls and seeks to prohibit development that exceeds the sun access plane and does not protect public open space in the vicinity of the Civic Place site, the Lancer Barracks site and Jubilee Park from overshadowing.

The relevant FSRs for the site are 2:1 and 6:1 south of Macquarie Street and 6:1 and 10:1 to the north – See **Figure 8** over.

Design Excellence and Design Competition Requirement

Design Excellence is a relevant consideration for the whole of the development. Under clause 22B of the LEP, design excellence applies to development involving the construction of a new building or external alterations to an existing building. Consent cannot be granted unless the consent authority is satisfied that the range of design excellence matters have been suitably addressed by the design of the development.



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Figure 7 – Height Map Extract – Parramatta City Centre LEP 2007

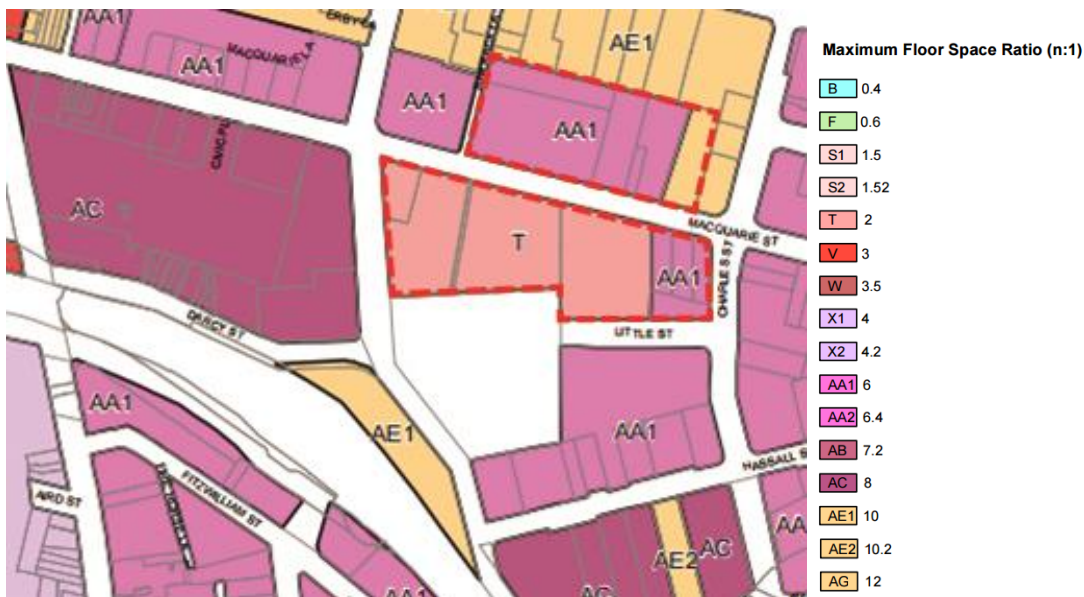


Figure 8 – FSR Map Extract – Parramatta City Centre LEP 2007

Further, under clause 22B(4) of the LEP stipulates that *consent must not be granted to the following development to which this Plan applies unless an architectural design competition, that is consistent with the City Centre Development Control Plan has been held in relation to the proposed development:*

- (a) development for which an architectural design competition is required as part of a concept plan approved by the Minister under Division 3 of Part 3A of the Act,

- (b) development in respect of a building that is, or will be, greater than 55m or 13 storeys (or both) in height,*
- (c) development having a capital value of more than \$1,000,000 on a key site, being a site shown edged heavy black and distinctively coloured on the [Key Sites Map](#),*
- (d) development for which the applicant has chosen to have such a competition.*

The only relevant sub-clause is (b) in relation to the height of the proposed tower element of the Arthur Phillip High School. At this early conceptual stage the massing envelope is at greater than 55 metres or 13 storeys (or both).

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Whilst the need for a Design Competition process can be waived if the Director-General (now Secretary) of the Department of Planning & Environment agrees via certification in writing (clause 22B(5) of the LEP), DoE is proceeding with an invited Design Competition for the whole of the Parramatta Schools project (including the Arthur Phillip High School tower component). The whole of the project will also be subject to the LEP's Design Excellence provisions.

4. Strategic Planning Context

State Plan / NSW 2021 (2011)

NSW 2021 is a 10 year plan to rebuild the economy, return quality services, renovate infrastructure, restore accountability to Government, and strengthen our local environment and communities.

As noted above, Education is one of 9 key areas of focus under the NSW State Plan 2021, which includes the 'Innovative Schools Successful Students' initiative. The proposed school is entirely consistent with this initiative.

A Plan for Growing Sydney (Metropolitan Strategy 2014)

The Government's vision for Sydney is: a strong global city, a great place to live.

To achieve this vision, the Government has set down goals that Sydney will be:

- a competitive economy with world-class services and transport;
- a city of housing choice with homes that meet our needs and lifestyles;
- a great place to live with communities that are strong, healthy and well connected; and
- a sustainable and resilient city that protects the natural environment and has a balanced approach to the use of land and resources.

One of the Directions & Actions coming from the Plan is to plan for education services to meet Sydney's growing needs and to assist in securing and planning for new school sites. Additionally, improved transport links are seen as key to get people to home, work, education, retailing, and leisure activities.

A key action is to provide enabling infrastructure (such as schools) to support growth and urban renewal and match population growth with the delivery of social infrastructure such as schools. The following passages are drawn from the Metropolitan Strategy 2014.

Delivering schools, tertiary education facilities and health facilities that meet the needs of Sydney's growing and changing population will be integral to maintaining Sydney's competitive edge and standard of living into the future.

Adequate teaching facilities are fundamental to the education of Sydney's children and their future contribution to the world. Schools are a focal point for community life, bringing families together. In some parts of the city access to good schools can drive demand for housing. While most schools are provided by the Government, around 33 per cent are provided by the private sector. Meeting the land use needs of both sectors will be important to providing choice and quality education for all.

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Opportunities to deliver facilities to meet Sydney's future school needs will be identified. New and expanded school facilities will be needed in urban renewal areas, greenfield sites and throughout established urban areas.

The Government will: investigate new innovative ways to maximise the benefits of existing infrastructure and improve the efficiency of delivering new infrastructure, such as multi-storey schools in dense urban communities.

The Government recognises that as the population grows in existing suburbs, there is an opportunity to revitalise local communities by providing more social infrastructure such as schools, health care and community services, and public transport.

Draft Sub-Regional Strategy (2015)

Parramatta sits within the West Central subregion under the current Metropolitan Plan for Sydney.

Under subregional strategy there will be a significant focus for infrastructure investment and intensive growth over the next 20 years. Greater Parramatta will continue to be Sydney's second CBD and a focus for jobs growth and services delivery in Sydney's west. A growing and prosperous Greater Parramatta will be supported by a network of centres providing jobs and services closer to home for many of the subregion's residents. This will improve liveability and contribute to strong, resilient communities throughout the subregion.

The overarching priorities for the Parramatta CBD under the strategy of relevance to this project are:

- Work with Parramatta Council to:
 - recognise and plan Greater Parramatta as a transformational place;
 - plan Greater Parramatta as Sydney's second CBD and Western Sydney's number one location for employment and health and education services, supported by a vibrant mixture of land uses and cultural activity, with the Parramatta River foreshore as a focus for recreational activities;
 - provide capacity for additional mixed-use development in Parramatta CBD and surrounding precincts including offices and retail in Parramatta CBD, health services in Westmead, an education hub around the new University of Western Sydney Campus, a technology and education precinct in

- Rydalmere, arts and culture in Parramatta, a sports precinct around Parramatta Stadium and housing in all precincts;
- enhance the role of the Parramatta Transport Interchange as the major bus/rail and future light rail interchange of Western Sydney; and
- improve walking and cycling connections between the Parramatta CBD, the Greater Parramatta precincts, Parramatta River and their surrounding area.

5. Relevant Planning Issues to guide the SEARs

The EIS for the project will address the full range of relevant environmental planning issues. The likely categories include:

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- Statutory and strategic planning context, including key relevant legislation and planning instruments, permissibility and development controls and standards
- Built form and urban design (height, bulk, scale, amenity, connectivity, appearance, use, materials, signage etc)
- Design Excellence, including the results of the Competitive Design Process
- Environmental Amenity (view loss, solar access, privacy, wind, noise etc – impacts of and upon the development)
- ESD (ESD principles adopted, water and energy saving measures etc)
- Traffic, Transport and Accessibility (vehicular and non-motorised transport as well as public transport options, parking, and other traffic impacts, as well as cyclist, pedestrian and disabled access)
- Noise and Vibration impacts upon the development, consistent with relevant EPA and/or Department of Planning guidelines, including compliance with relevant provisions of the Infrastructure SEPP in relation to rail infrastructure
- Contamination, HAZMAT and remediation
- Heritage and Archaeological (European & Aboriginal)
- Contributions, noting the Crown designation of the project
- Drainage and stormwater management
- Servicing and waste management (construction and operational)
- Earthworks and geotechnical matters,
- Ecology and/or Arboricultural assessment(s)
- Landscaping
- Services and utilities (existing and likely new or augmented connections)
- BCA / Fire safety report
- Construction / Demolition Management Plan – as relevant to the SSD DA components of the project.
- Drawings, plans, elevations, management plans, schedules of materials and the like
- Evidence of consultation

As the school is a new or extension development and will have greater than 50 students and access to a road, under Schedule 3 of the Infrastructure SEPP it will be 'traffic generating development' and be required to be referred to the RMS for comment.

6. Consultation

To date DoE has undertaken limited consultation with stakeholders outside of the school-based stakeholders due to the current conceptual level of design resolution. As noted

above, dwp|suters were commissioned to prepare a masterplan study with concept design options supported by value management information, high level cost estimates and risk assessment for the redevelopment of these schools. The preferred masterplan option with high level cost estimate and risk assessment will be used as a business case for funding of the schools projects as part of the Department's Total Asset Management Strategy.

As part of that process, a Project Advisory Group (PAG) was set up in order to help procure an outcome as described above. The PAG consisted of representatives from the Department's Education and Facilities directorates as well as the two principals from the two Schools involved. The consultant group consisted of members of dwp|suters architects and Altus Page Kirkland Quantity Surveyors.

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In terms of external stakeholder consultation, one of the first tasks the recently engaged Project Management consultant will complete is a strong communications plan that engages with all stakeholders, allowing everyone to have input in to the design:

- DoE will consult extensively with both school communities, teachers and students as well as the broader community, Council and other stakeholders throughout the design and construction phases of the project.
- Consultation will be facilitated through a number of channels including information booths, workshops and online surveys.
- A web site will be established to present the latest information.
- Consultation activities like the information booths will be well publicised in the local media and on the project web site to ensure as many stakeholders participate as possible.

7. Conclusion

Based on the above the key relevant matters in relation to this proposed development are:

- The Capital Investment Value (CIV) of the Project is in the order of \$100 Million and in excess of the requisite SSD threshold of \$30 Million for Educational Establishment projects.
- The site is zoned B3 – Commercial Core under Parramatta City Centre LEP and educational establishments are permitted with consent.
- The site has a 12m, 60m, and 72m height limit in part and is otherwise substantially controlled by a sun access plane for key public sites to the south. The applicable FSR controls are 2:1 and 6:1 to the south of Macquarie Street and 6:1 and 10:1 to the north of Macquarie Street.
- The Design Competition Process may also allow a further 10% on top of the height and FSR controls (if successful and/or required). Note, DoE is neither seeking or reliant upon a bonus to undertake the project.
- The sun access provision prohibits development that results in any part of a building projecting above the sun access plane controls established for that land by the City Centre Development Control Plan and impacts upon public open space in the vicinity of the Parramatta Square site, the Lancer Barracks site and Jubilee Park.
- The proposal would be a Crown DA which cannot be refused and DCP's do not apply to SSD DAs.
- With respect to other LEPs provisions, the site:

- Satisfies the requirements of clause 29D – the ground floor of any development that is a building on land zoned B3 Commercial Core is to have active street frontages
- Is not flood prone land
- Is not subject to the Special Provisions, Key Sites or Land Reservation Acquisitions maps
- The sites are variously listed as State heritage items. The sites also have significant archaeological potential from an Aboriginal and colonial settlement perspective.
- There are currently no draft LEPs or other plans that would adversely impact upon the development from a statutory planning perspective. The school also broadly satisfies and supports all Metropolitan and Sub-Regional Planning Strategies

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On the basis that the Project falls within the requirements of clause 15 of Schedule 1 of the SRD SEPP being *development for the purpose of educational establishments (including associated research facilities) that has a capital investment value of more than \$30 million*, DoE formally requests the Department issue the SEARs for the Project to facilitate the preparation of the EIS to accompany the SSD Application.

We trust that the information detailed in this letter is sufficient to enable the Secretary to issue the SEARs for the preparation of the EIS. Should you have any questions or queries with respect to any of the above information, please don't hesitate to contact me on 8202 8000 or 0437 259 581 or oliver.klein@robertsday.com.au.

Yours Sincerely

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Oliver Klein
Senior Associate

Attached:
Plans and details of the project (as extracted from the dwp|suters Masterplan Study