

**Redevelopment of Epping West Public School - SSD-9250948****1. Introduction**

The Epping Civic Trust is Epping's peak community body representing the interests of local residents. This includes families living in the vicinity of this proposal. The Trust welcomes the opportunity to review this important plan and comment on it.

Firstly, the Trust acknowledges that the investment in new buildings and facilities for Epping West PS (EWPS) is needed. In fact, it is way overdue. The over-crowding of the current school has led to pressures on traffic, parking, local resident amenity and a very poor outcome for the school's students due to loss of open space and sports areas to temporary classrooms.

The Trust agrees that:

- New buildings to provide quality long-term school facilities are needed
- The plan has attempted to preserve heritage items - the street frontage to Carlingford Road - and some existing trees
- The removal of 11 temporary classrooms is good

However, our submission seeks to look beyond these points of agreement and present areas where we have concerns with the proposal especially in the context of the greater good for the local community, as well as the school's users.

**2. Situation analysis**

Epping has undergone rapid densification in the past decade, and will see quite a bit more in the next decade. This has led to a large increase in population (predominately in the 20-45 age group including families). The City of Parramatta Council has modelled population growth through their Epping Planning Review (2016). This concluded:

- Original projections for growth under Urban Activation Precinct was for 3,750 new dwellings between 2014-2036
- Council modelled that about 5,500 new dwellings would actually be built between 2014 – 2023 (most of those have now been completed or started)
- Council also estimated that the planning controls allowed for up to 10,000 new dwellings in the town centre
- Council uses an average household size of 2.3 people - so the dwellings already built have increased the population by over 12,000 residents. At the

top estimate of 10,000 dwellings, that would increase the population by 23,000 residents.

### 3. Proposal concerns

#### 3.1 School population in Epping

This proposal says that the current 1,300 students will drop to 1,000 by 2028. This needs to be viewed in conjunction with the plan for the new Epping South PS. But it should also be seen in the context of the large increase in population – and how it will continue to increase.

In essence, under these two SSDs, by 2028 this part of Epping would have a net increase in school places (between drop at EWPS and the new ESPS) of 500 students (with a possibility of a further 200 at ESPS, but this is neither planned or budgeted for in this SSD proposal). Is this sufficient when by then up to an additional 4,500 household dwellings may have been constructed or be underway?

This issue is clearly flagged by the City of Parramatta Council in its response to the SEARs (page 3 under Place Services). But the EIS fails to adequately address this issue. The council called for demographic modelling at part of the EIS but this does not appear to have been done.

##### 3.1.1 Epping West PS numbers strategy

One outcome of the population spike has been the over-crowding of EWPS and the resultant temporary classrooms taking up the sports oval/playground area. However this proposal, when considered in conjunction with the Epping South PS proposal, does not solve this problem. Instead, it presents a sleight of hand solution.

In this proposal the school numbers would drop by 300 students but not until 2028 when Stage 2 of the new Epping South PS opens (lifting initial numbers from 600 to 800). That leaves EWPS with an enlarged capacity past the opening date of the new facility (2023) for an additional 5 years to 2028.

In fact, the EIS on page 8 clearly states that the school capacity will not actually change with this proposal:

Capacity

The school's capacity will not change as a result of this SSD. The works will enable the removal of temporary classroom buildings (under a separate approval pathway) which will progressively reduce capacity from 54 teaching spaces (1,300 students) to 44 teaching spaces (1,000 students) by 2028 once a new school in Epping increases its enrolments.

The school population and local residents should not be misled that this SSD is attempting to relieve the over-crowding of EWPS. It does not. In fact, it leaves the overcrowding until at least 2028, by which time the population is likely to increased by so much that any drop in numbers will be impossible.

The Trust therefore opposes the strategy that underpins this SSD and the one for Epping South PS. Overall, this is a short-term strategy that just sets the area up for further school overcrowding and fails to properly plan in advance for the future school population of the area. When more than \$60 million of public money is being spent, can't a more long-term vision and plan be drawn up?

### 3.1.2 Temporary Buildings

Why does this plan propose a temporary modular building, Building T, which is then proposed to be moved in 2028 to the new Epping South PS? What expense is incurred through this removal? Does it make any sense whatsoever?

Why not:

- Make Building T a permanent building for EWPS from 2023 and use it to remove more temporary classrooms and reduce pressure on this site and its surrounds immediately by planning a slightly larger permanent building
- Increase the size of Epping South PS to 800 students from its initial build through utilising the area where Building T is due to move to in 2028. This will increase the budget overall but improve the final outcomes for both proposals

### 3.1.3 Temporary classrooms

The Department of Education has a policy that temporary classrooms should only be used as a short-term measure (up to 7 years). The ones at Epping West have already been there for longer than 7 years. Whilst this plan proposes removing some, it will still leave a considerable number of temporary classrooms until 2028 – 7 years from now. That is unacceptable and fails the department's own policy. The Trust therefore recommends that this proposal is reviewed in conjunction with the Epping South PS proposal, so that ALL demountables are removed in 2023 on opening of the new facilities, and ESPS.

In addition, the SEARS from the City of Parramatta Council asks on Page 2, under Site Capacity, for clarification of the maximum number of students to ever be accommodated on the site in the future. We cannot see in the EIS that such a clarification has been provided. That raises the very real possibility that given continued rise in local population, and that Stage 2 and 3 of Epping South PS have not been budgeted or planned yet, that the higher numbers and temporary classrooms at Epping West PS will continue indefinitely.

With two such major projects taking place in tandem why can these issues not be resolved now? There should be:

- A commitment to the complete removal of all the temporary classrooms at EWPS (rather than the vague mention on page 18 of the EIS to removal of the remaining temporary classrooms under 'a separate planning pathway')
- Funding including in this plan for the full restoration of the sports oval to its primary function
- A commitment to the maximum number of students to go to EWPS
- A review of the scaled approach at ESPS with the alternative approach of only one stage of construction at that school for 800 students
- Forward planning now take place for an additional school facility between Epping Town Centre and Carlingford to accommodate the likely school numbers coming into the system between 2025-2035

### **3.2. Sports and open space provision**

As already mentioned, this SSD proposal does not include the restoration of the school's sports oval – currently occupied by temporary classrooms. In fact, the restoration of the sports oval is frequently cited throughout the proposal as one of the rationales for the plan and the preferred design option. But the actual plans **do not** actually achieve this aim.

This severely curtails appropriate amount of outdoor play and sports space for this large school. In fact, the importance of this facility is noted right at the beginning of the Design Analysis Report (Page 16) where the reinstatement of the sports oval was noted as a design principle right at the beginning of this project. It is also included in the Landscape masterplan. So why is this not achieved?

Whilst the site is next to, and can access, West Epping park and its sports facilities, the capital works and maintenance of this facility falls to local government. And the use by the school impinges on usage by other community members.

There are two key points here:

- a) Sports oval – it is not satisfactory for the EIS of this proposal to push the restoration of the sports oval off to some future unspecified time (and a separate DA proposal which page 17 of EIS says has not yet been started). This facility is needed now.
- b) If the sports oval is not restored to use, then the State Government should make ongoing contribution to City of Parramatta Council for the maintenance (wear/tear and capital upgrades) of West Epping park. Otherwise, an unreasonable burden is placed on rate payers.

### **3.4 New building height**

It is noted that the proposed three-storey building on Ward Street is well in excess of the permissible height for this area under the HELP 2013. While the EIS seeks to present justification for this, and it is certainly better that the required classroom space is achieved by not consuming more of the site footprint or outdoor facilities, it does set a precedent for the area. Surrounding streets are all one or two storey residential buildings.

The Trust therefore feels it is important that this is not seen as a precedent leading to requests for rezoning of neighbouring streets for greater height or density.

### **3.5 Design elements**

The Trust notes in the Design Analysis Report (page 27) that the materials palette has been chosen to ensure colour harmony with the existing heritage buildings and the local neighbouring houses.

The Trust feels it is very important that this palette is mandated in any construction certificate. It is very concerning that on page 59 of the Heritage Impact Statement it is said that the finishes and detailed design elements will be developed later in the design phase.

The Trust does not find this satisfactory because when Epping Public School was on exhibition for its new building, a similar heritage colour palette was proposed. The DA was approved, but what was actually built is in blue and other colours that are totally out of keeping with the heritage values. When was this changed? It is very important that such a change does not happen with this proposal.

### **3.5 Landscaping and Trees**

The Arboricultural Impact Assessment clearly articulates a number of significant trees that are likely to be adversely impacted due to these plans. But the proposal has not been modified to mitigate this. Why not? There is no explanation why these modifications can not be made. These trees are an important component of the site and our suburb and the remedies have been identified and should be accommodated.

For example, tree #99 – a tree of high significance. The expert reports recommends the relocation of stormwater, but that does not seem to have been done.

The Trust urges this work be included and this tree be preserved.

### **3.6 Traffic and Access**

The streets around EWPS have experienced considerable stress during morning and afternoon peak time for several years, as the school population grew. This is very well articulated in the Transport Impact Assessment on page 28 when it says that there are long queues for traffic and ‘... *a challenging environment for pedestrians to cross the road*’. In other words, the current access for traffic and pedestrians doesn’t work.

Yet, this proposal brushes those concerns aside and essentially plans to continue the current system, albeit with some minor modifications that City of Parramatta Council are currently undertaking after considerable lobbying by local residents and the Trust.

Interestingly, the Drop Off and Pick Up Duration Survey by SCT Consulting did not include Ryde Street, a very congested area during these busy peak periods and which prompted City of Parramatta Council to undertake the referenced improvement works. The SEARS Traffic Statement prepared by SCT Consulting at page 2 identified Ryde Street as one of the locations where the majority of students were dropped off in the morning and picked up in the afternoon. Without the inclusion of Ryde Street in the survey, the conclusions are not a true reflection of the overall traffic congestion surrounding EWPS.

Page 38 of the Transport Impact Assessment clearly states that no change is proposed to the drop off zones, and no planned road infrastructure changes as part of the SSD. That effectively bakes in the continued unsatisfactory traffic impacts of the school that this report shows. How is this either acceptable or satisfactory? With a new school build, there should be at least an attempt to improve things.

### **3.6.1 Entrance Way**

The Design Analysis Report notes that a key decision is to move the current main entry of the school from Carlingford Road to Ward Street. However, one implication of this move is that it further increases pressure on that Ward Street entry area. Not only will Kiss and Drop pupils use it, but those who walk/cycle from south of Carlingford Road, and come over the pedestrian bridge will need to move around into Ward Street. There is not sufficient analysis of the impact of this pedestrian movement on the path area along Carlingford Road. In fact, the Traffic Impact Assessment (on page 41) makes a statement that due to a decrease in school numbers there is no impact on walking access. That totally fails to recognise that the drop in capacity is not happening until 2028 – five years after the new school buildings open. What is supposed to happen during those first five years?

What is also very concerning in this report (page 41) is the reliance on council funding for undertaking a range of works for pedestrian access. This is not satisfactory and these works should be included in the scope and budget of this SSD.

### **3.7 Community Use**

In several places, this proposal talks about community use, or shared use, of the new refurbished school. Existing usage by community groups are listed. An example is page 5 of the Design Analysis Report – where Shared Use is mentioned but not actually dealt with in a constructive manner. Rather it is put off to discussions with the school. This is not satisfactory and fails to make the best of the opportunity for proactive community use presented by these new facilities. The Trust would prefer to see a proper plan for wider engagement and use with local community uses.

### **Conclusion**

The Trust supports important works to address over crowding at this school, but urges a review of the capacity strategy, and inclusion of related works surrounding the school, rather than relying on council to deliver these aspects.