
From: DPI Landuse Enquiries Mailbox
Sent: Thursday, 17 September 2020 3:42 PM
To: Prity Cleary
Subject: RE: Notice of RtS - Westmead Catholic Community Education Campus (SSD-10383) - Landuse enquires

Hi Prity,

The Department of Planning, Industry and Environment (DPIE) - Water and the Natural Resources Access Regulator (NRAR) have reviewed the RTS and have no further comments.

Regards,

Judy Court

Assistant Project Officer

Water | Department of Planning, Industry and Environment

T [REDACTED] | E [REDACTED]
4 Parramatta Square, 12 Darcy St, Parramatta

www.dpie.nsw.gov.au

Our Vision: Together, we create thriving environments, communities and economies

From: Prity Cleary <[REDACTED]>
Sent: Wednesday, 16 September 2020 9:48 AM
To: DPI Landuse Enquiries Mailbox <landuse.enquiries@dpi.nsw.gov.au>
Subject: Notice of RtS - Westmead Catholic Community Education Campus (SSD-10383) - Landuse enquires



Planning,
Industry &
Environment

-via email-

landuse.enquiries@dpi.nsw.gov.au

To Whom it May Concern,

Please be advised that Applicant, has submitted a Response to Submissions (RtS) Report for the comments and matters raised during the exhibition of the Westmead Catholic Community Education Campus (SSD-10383).

A copy of the RtS Report is available on the Department's website at:

<https://www.planningportal.nsw.gov.au/major-projects/project/25716>

The Department has commenced its assessment of the proposal, but would also like to provide you with the opportunity to review the RtS. Any comments on the Applicant's RtS should be received by the Department as soon as possible and by no later than **28 September 2020**.

If we do not receive a reply by the closing date, we will presume that you have no objection to the proposal.

Should you wish to discuss any of the above, please contact me on (02) [REDACTED].

Kind regards,

Prity Cleary

Senior Planner

Social and Infrastructure Assessments

Infrastructure Assessments

4 Parramatta Square, 12 Darcy Street | Locked Bag 5022 | Parramatta NSW 2124

T [REDACTED]

E [REDACTED]



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Industry &
Environment**



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Please consider the environment before printing this e-mail.

From: Government Relations <government.relations@casa.gov.au>
Sent: Friday, 18 September 2020 12:38 PM
To: Prity Cleary
Cc: Government Relations
Subject: CASA Response GI20/881 - NSW Planning re Notice of RtS - Westmead Catholic Community Education Campus (SSD-10383) - CASA [SEC=OFFICIAL]

OFFICIAL

Dear Ms Cleary

Thank you for your email below regarding the Westmead Catholic Community Education Campus (SSD-10383).

The Civil Aviation Safety Authority (CASA) has reviewed the Response to Submissions and has no objection to the proposal. CASA notes that the Southern NSW Ambulance Helicopters has provided aviation safety lighting requirements for construction cranes and has liaised with relevant helicopter operators.

Please note that Mr Steve Neal is no longer the point of contact for development applications. Please direct all further enquires to me by email at: government.relations@casa.gov.au.

I trust this information is of assistance.

Yours sincerely

Cathy Koch
Section Manager Corporate Reporting & Government Relations
CASA\Corporate Services Division
p: +61 2 [REDACTED] / +61 [REDACTED]
e: [REDACTED]

Aviation House, 16 Furzer Street, PHILLIP ACT 2606
GPO Box 2005, Canberra ACT 2601

www.casa.gov.au



From: Prity Cleary <[REDACTED]>
Sent: Tuesday, 15 September 2020 3:30 PM
To: Airspace Protection <Airspace.Protection@casa.gov.au>
Subject: Notice of RtS - Westmead Catholic Community Education Campus (SSD-10383) - CASA



Attention: Mr Steve Neal
Government and International Relations Branch
Civil Aviation Safety Authority

-via email-

airspace.protection@casa.gov.au

Mr Neal

To whom it may concern

Please be advised that Applicant, has submitted a Response to Submissions (RtS) Report for the comments and matters raised during the exhibition of the Westmead Catholic Community Education Campus (SSD-10383).

A copy of the RtS Report is available on the Department's website at:

<https://www.planningportal.nsw.gov.au/major-projects/project/25716>

The Department has commenced its assessment of the proposal, but would also like to provide CASA with the opportunity to review the RtS. Any comments on the Applicant's RtS should be received by the Department as soon as possible and by no later than **28 September 2020**.

If we do not receive a reply by the closing date, we will presume that you have no objection to the proposal.

Should you wish to discuss any of the above, please contact me on (02) [REDACTED].

Kind regards,

Prity Cleary

Senior Planner

Social and Infrastructure Assessments

Infrastructure Assessments

4 Parramatta Square, 12 Darcy Street | Locked Bag 5022 | Parramatta NSW 2124

T 02 [REDACTED]

E [REDACTED]



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From: Cornelis Duba <[REDACTED]>
Sent: Friday, 18 September 2020 8:41 PM
To: Prity Cleary
Cc: DPE CSE Information Planning Mailbox
Subject: NSW Planning, Industry & Environment SSD-10383 Westmead Catholic Community Education Campus Response to Submissions

Hello Prity

I refer to the your below email of 15 September 2020 regarding the Response to Submissions (RtS) for the Environmental Impact Statement (EIS) for State Significant Development SSD 10383 at 2 Darcy Road, Westmead (Lot 1 DP 1095407, Lot 1 DP 1211982) for Westmead Catholic Community Education Campus – ‘Primary school with capacity for approximately 1,680 students, new Parish church, early learning centre, multi-storey car park and drop off zone and landscaping’. Submissions need to be made to the Department by 28 September 2020.

In regard to Endeavour Energy’s submission made to the Department on 10 April 2020 for the EIS, Endeavour Energy has noted that the RtS Report refers to Endeavour Energy’s submission but the matters raised therein do not form part of the Key Issues included in the Department’s request to the applicant for the RtS. From a review of the revised plans and documents there is no readily apparent impact on the electricity infrastructure. Accordingly the recommendations and comments provided in Endeavour Energy’s previous submission for the EIS remain valid.

Should you wish to discuss this matter, or have any questions, please do not hesitate to contact me. Due to the high number of development application / planning proposal notifications submitted to Endeavour Energy, to ensure a response contact by email to property.development@endeavourenergy.com.au is preferred.

With the current COVID-19 health risk, as many as possible of Endeavour Energy staff are working from home. As a result there is only a small contingent located at the Huntingwood head office for essential operations. Although working from home, access to emails and other internal stakeholders is now somewhat limited and as a result it may take longer than usual to respond to enquiries. Thank you for your understanding during this time.

Kind regards
Cornelis Duba
Development Application Specialist
Network Environment & Assessment
M: [REDACTED]
T: 131 081
E: [REDACTED]
51 Huntingwood Drive, Huntingwood NSW 2148
www.endeavourenergy.com.au



From: Prity Cleary <[REDACTED]>
Sent: Tuesday, 15 September 2020 3:39 PM
To: Property Development <Property.Development@endeavourenergy.com.au>
Subject: Notice of RtS - Westmead Catholic Community Education Campus (SSD-10383) - Endeavour Energy



Attention: Ms Pat Woodbury
Network Environmental Assessments Manager
Endeavour Energy

-via email-
property.development@endeavourenergy.com.au

Ms Woodbury

Please be advised that Applicant, has submitted a Response to Submissions (RtS) Report for the comments and matters raised during the exhibition of the Westmead Catholic Community Education Campus (SSD-10383).

A copy of the RtS Report is available on the Department's website at:

<https://www.planningportal.nsw.gov.au/major-projects/project/25716>

The Department has commenced its assessment of the proposal, but would also like to provide Endeavour Energy with the opportunity to review the RtS. Any comments on the Applicant's RtS should be received by the Department as soon as possible and by no later than **28 September 2020**.

If we do not receive a reply by the closing date, we will presume that you have no objection to the proposal.

Should you wish to discuss any of the above, please contact me on (02) [REDACTED].

Kind regards,

Prity Cleary

Senior Planner

Social and Infrastructure Assessments

Infrastructure Assessments

4 Parramatta Square, 12 Darcy Street | Locked Bag 5022 | Parramatta NSW 2124

T 02 [REDACTED]

E [REDACTED]



Our ref: DOC20/762859
Senders ref: SSD 10383

Prity Cleary
Senior Planning Officer
Social and Other Infrastructure Assessments
Department of Planning, Industry and Environment
4 Parramatta Square
12 Darcy Street
PARRAMATTA NSW 2150

Dear Ms Cleary,

Response to Submissions – Westmead Catholic Community Education Campus, 2 Darcy Road, Westmead

Thank you for your email of 15 September 2020, requesting input from Environment, Energy and Science Group (EES) in the Department of Planning, Industry and Environment (DPIE) on the Response to Submissions (RtS) for Westmead Catholic Community Education Campus, 2 Darcy Road, Westmead.

EES provided previous correspondence dated 22 April 2020 and EES have reviewed the RtS table prepared by Ethos Urban dated 14 September 2020 and makes the following comments.

Aboriginal Cultural Heritage Assessment Report

Please note from 1 July 2020 Aboriginal cultural heritage regulation, including advice regarding SSIs and SSDs, is now managed Heritage NSW. The new contact for the ACH regulation team is heritagemailbox@environment.nsw.gov.au.

Biodiversity

There is no further comment in relation to biodiversity.

Flooding

There is no further comment in relation to flooding.

Riparian Land

The proponent has not advised if the proposed condition of consent as outlined below is accepted, therefore EES repeats that if the consent authority determines to grant approval, EES recommends that the following be inserted as a condition of consent:

- A landscaping Plan be submitted indicating any proposed planting in the riparian corridor should consist of a diversity of local native provenance species (trees, shrubs and groundcover species) from the relevant native vegetation community that occurs along the corridor.

Urban Tree Canopy and Landscaping

The proponent has not advised if the proposed condition of consent as outlined below is accepted, therefore EES repeats that if the consent authority determines to grant approval, EES recommends that the following be inserted as a condition of consent:

A Landscaping Strategy be prepared that

- identifies any trees and other vegetation to be removed or retained on site
- includes details on the native vegetation community (or communities) and native plant species that once occurred in this location
- specifies that any landscaping will use a diversity of local provenance native species trees, shrubs and groundcovers) from the native vegetation community (or communities) that once occurred on the site to improve biodiversity
- includes a list of local native provenance species (trees, shrubs and groundcovers) to be used in the site landscaping
- uses a diversity of advanced size local native trees preferably with a plant container pot size of 100-200 litres, or greater in the landscape areas
- provides enough area/space to allow any planted trees to grow to maturity on the site
- any trees proposed to be removed should be replaced at ratio of greater than 1:1 to assist improve the urban tree canopy and to mitigate the urban heat island effect
- including a maintenance regime for landscaping for a period of 12 months including the replacement of any plants lost during this time.

If you have any queries or would like additional information regarding this matter, please do not hesitate to contact Bronwyn Smith Senior Conservation Planning Officer on 02 [REDACTED] or at [REDACTED]

Yours sincerely



21/09/20

Susan Harrison
Senior Team Leader Planning
Greater Sydney Branch
Environment, Energy and Science



Our ref: DOC20/759440

Ms Prity Cleary
Senior Planning Officer
Department of Planning Industry and Environment

By email [REDACTED]

Dear Ms Cleary

Response to Submission comments for Westmead Catholic Community Education Campus, 2 Darcy Road, Westmead (SSD 10383)

Thank you for your referral dated 15 September 2020 inviting comments from the Heritage Council of NSW on the above State Significant Development (SSD) Response to Submissions.

The following comments are provided to address the applicant's response to the heritage issues raised:

- Previous Heritage NSW comments indicated that the previously submitted Statement of Heritage Impact did not meet the SEARs requirement.
- An updated Statement of Heritage Impact (SoHI) has been provided. It indicates that the study area does not have any historic heritage items or areas of historical archaeology. Heritage NSW accepts this assessment.
- It is recommended that the project includes an unexpected finds protocol within the Construction Management Plan to ensure that any unexpected archaeology is appropriately managed.

If you have any questions regarding the above advice, please contact Rebecca Newell, Senior Historical Archaeology Officer at Heritage NSW, on [REDACTED] or [REDACTED].

Yours sincerely

23 September 2020

Dr Siobhan Lavelle OAM
Senior Team Leader
Specialist Services
Heritage NSW
Department of Premier and Cabinet
As Delegate of the Heritage Council of NSW

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

Our Ref NCA/8/2019

Contact Thomas Fernandez

Telephon

e 

Email 

01/10/2020

Dear Mrs Cleary,

COUNCIL SUBMISSION

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

SUMMARY

Thank you for the opportunity to comment on the above mentioned project and the proponent's Response to Submissions (RTS).

The following amendments to the proposal following public exhibition of the EIS are noted:

- Changes to the pick-up and drop off configuration to allow for increased efficiency; and
- Removal of the ground floor admin fit-out to Catholic Early Learning Centre (CELC) building which will be sought in a separate application.

Council Officers have reviewed the RTS documents and supporting information and wish to **advise that matters previously raised by way of objection have not been satisfactorily resolved. Council therefore, maintains its objection to the current proposal.** The following key issues remain:

- **Traffic**
 - The assumptions used to inform the modelling scenarios, including percentage of students using the OOSH and modal split, are unlikely to be achieved. As such, the modelling scenarios do not accurately reflect the impact of the proposal.

Contact us:

council@cityofparramatta.nsw.gov.au | 02 9806 5050
@cityofparramatta | PO Box 32, Parramatta, NSW 2124
ABN 49 907 174 773 | cityofparramatta.nsw.gov.au

- The impact to surrounding intersections continues to be unacceptable and no suitable avenues have been explored to offset the overall impact of the proposal including the potential for a direct connection from Bridge Road to the school. Council is of the strong view that this is a critical matter and must be addressed and provided as part of this application
- Connectivity
 - The RTS does not address the issue of connectivity, rather it defers the matter to future 'ongoing development of the campus'. The significant intensification of the site proposed as part of this application is considered to warrant improved pedestrian connections.
- Open Space and Recreation
 - The cumulative impact of the loss of these sporting fields on nearby Council facilities has been inadequately addressed in the context of the findings of Council's Community Infrastructure Strategy. Council is also concerned there is an adverse social impact on student wellbeing by reduction in areas for physical activity/education.
- Developer Contributions
 - Council concluded in its previous submission that the applicant should not be exempt from paying development contributions. The applicant has responded to this submission, arguing that the school/church will be providing all amenities and services on site and the proposal will not generate additional demand for services. This claim is not supported and the applicant should demonstrate a commitment to paying the contributions.

These matters are discussed in further detail within the submission below.

Council notes that the applicant has addressed some matters previously raised in our submission. The changes to pick up and set down arrangements on the school grounds are acceptable.

However, the overall cumulative impact of the proposal remains unacceptable.

Given that Council has not withdrawn their objection, it is understood, as per Clause 8A (1) (a) of the State Environmental Planning Policy (State and Regional Development) 2011, that the Independent Planning Commission (IPC) will be the determining authority.

KEY ISSUES

Traffic

Traffic Volumes/Modelling

The peak arrival traffic volumes, which form the basis of the modelling scenarios, rely on 40% of primary school children using the OOSH. This is considered unachievable particularly in the AM peak when school and work travel tends to be compressed into a shorter period than the PM peak. Similarly, the modelled 10% improvement in modal split for the primary school is optimistic, particularly as its catchment area will increase beyond the existing. These estimates have not been demonstrated as achievable or reasonably reflective of the operation of other similar facilities. Council notes that there is no mechanism to compel the school or parents to meet these targets. As such, the modelling scenarios do not accurately reflect the impact of the proposal.

Intersection of Bridge Road and Darcy Road

The proposed SSD will increase traffic volumes at many intersections in the precinct as previously advised within Council's EIS submission.

The proposed SSD has a significant impact on the intersection of Bridge Road and Darcy Road. The Level of Service for the 2033 scenarios in the PM peak, show a deterioration from C to F resulting from the development (assuming 10% model split change and 48% of students using the OOSH). As previously advised and illustrated within the draft Westmead Innovation District Masterplan this issue could be addressed by providing a direct connection from Bridge Road to the school, thereby removing some traffic from the intersection of Bridge Road and Darcy Road.

The link from Bridge Road into the school site is achievable and is critical. The adjacent site to the west, required to deliver this link is owned by the State Government and opportunity exists for the proponent and the land owner to work collaboratively to address traffic congestion issues, which may well be mutually beneficial. There is already a driveway on the land in the approximate location that the link could be constructed, and there are not considered to be any other insurmountable factors preventing construction of the link to connect to Bridge Road.

Connectivity – Urban Design

The RTS submission acknowledges the need for a finer grain network of connections, however, does not attempt to address the issue as part of this application.

The street block in which the school is located (as bound by Hawkesbury Road, Darcy Road, Bridges Road and the railway) is extremely large and not conducive to a walkable

environment. If this street block were to redevelop without through site connections, it will become a major blocker to the overall accessibility between Westmead precinct and the future transport infrastructure.

A pedestrian connection to Farmhouse Road South should be delivered as part of this application. Any measures to encourage the use of Farmhouse Road rather than Darcy Road would also reduce footpath overcrowding and improve safety.

Improved pedestrian connections should be detailed as part of the development application package to safeguard delivery.

Open Space and Recreation

The proposal is to provide for approximately 8m² open space per student including both ground level (~6000m²) and within the built form (~7,800m²), including 2 x multi-use courts and mini-running track on the Level 5 rooftop. It is also noted that the future masterplan retains 2 x nearby existing multi-use courts that will complement the proposed rooftop courts. Whilst it is acknowledged that this provides for an innovative approach to open space provision, it is not considered to adequately offset the loss of the junior sportsfield, which provides for a higher level of flexibility and able to accommodate a more diverse range of activities than the proposed open spaces.

The proposal will result in increasing pressure on the two existing high school fields to the south that are already at capacity, with the 2630+ Catherine McAuley and Parramatta Marist students already reliant upon the use of nearby Council facilities at Ollie Webb Reserve (Parramatta), Jones Park (Parramatta), Binalong Park (Toongabbie), Doyle Ground (North Parramatta) and Arthur Phillip Park (Northmead) to meet their physical activity needs.

It is further noted that the future masterplan indicates a reduction of these full-size sporting fields from 2 to 1, further exacerbating the demand on Council facilities that are also at or near capacity and have limited ability to accommodate additional school demand for the 3,900 students within the precinct.

The submission also states that the proposed sporting field will have to be managed so high school and primary school schedules are not clashing but this will be difficult, if not impossible, with only the one field and 3,900 school students, noting that both the Catholic Primary and Secondary Schools as well as offering PDHPE and school sport provide formal sporting participation opportunities and representative sporting pathways for their students.

The cumulative impact of the loss of these sporting fields on nearby Council facilities has been inadequately addressed in the context of the findings of Council's Community Infrastructure Strategy. The submitted Social Impact Assessment has not addressed the impact of the loss of sporting field space nor how this impacts upon the ability of students to be able to undertake adequate levels of physical activity and formal sport, particularly in the context of the limited capacity of a single field and nearby Council open space and recreational facilities.



Figure 2: Highlighting the loss of sporting fields

Developer Contributions

In Council's previous submission it was concluded that the applicant should not be exempt from paying development contributions, and based on the value of works provided at that time, instructed that a payment of **\$804,742.00** would be payable, consistent with the Parramatta Non-CBD Development Contributions Plan. The applicant has responded to this submission, arguing that the school/church will be providing all amenities and services on site and the proposal will not generate additional demand for services. This claim is not supported as the development, if approved in its current state, will place additional strain on Council-provided infrastructure in the area as evidenced by Council's submissions, particularly Council's open space.

Further, the applicant has stated that *'if DPIE is of the mind to levy the development, the condition should be drafted so that any contribution is required to be spent on works in the vicinity of the site which would address connectivity concerns raised by Council'*. This has the potential to fetter Council's discretion of allocating development contribution funds on a priority basis and would set an undesirable precedent where different applicants can select where development contribution funds are allocated.

If the cost of works has changed since the previous iteration of the SSDA please advise and an amended levy rate will be provided accordingly. Council strongly maintains its contention that development contributions are payable and warranted for this development.

FURTHER MATTERS

Vegetation Management Plan

The applicant refers to a previous Landscape Rehabilitation Plan and Vegetation Management Plan (2009) that was to be implemented over a 2 year period. This requires updating to ensure adequate control of priority weed species and weeds of national significance still present within the corridor in accordance with the Biosecurity Act 2015 and to provide opportunities for the offsetting of proposed tree removals.

Stormwater and Catchment Management

Council's main concern was with the lack of WSUD landscape integration in the design. The Applicant has not demonstrated a constructive response to the previous advice.

In the response it was stated that two sites for raingardens were explored but other demands were being placed on these spaces. However, there is no evidence of this throughout the accompanying documentation to support this was investigated.

Council trusts the Department's assessment to appropriately address matters previously raised in this regard. It is acknowledged that these matters could be addressed by conditions of consent, should approval be recommended.

Environmental Health

Please ensure Council's previous comments are addressed throughout the assessment of the application.

Next Steps

Council anticipates discussions to be held with the applicant, DPIE and IPC following review of the above.



**CITY OF
PARRAMATTA**

The Council would also appreciate the opportunity to comment on any proposed conditions of consent at the appropriate time, should the application be recommended for approval to the IPC.

Should you wish to discuss the above matters, please contact Thomas Fernandez on [REDACTED]
[REDACTED] or at [REDACTED]

Yours sincerely

Jennifer Concato
Executive Director City Planning and Design



CUMBERLAND
CITY COUNCIL

Ref: OA2020/0009

02 October 2020

NSW Government - Planning Industry & Environment & Mr M Desylva
4 Parramatta Square
12 Darcy Street
PARRAMATTA NSW 2150

Dear Sir/Madam,

Subject: Request for response to submissions
Application No: OA2020/0009
Property: Cnr. Darcy Rd & Mons St, Westmead NSW 2145
Proposal: Ministerial Consent - Westmead Catholic Community Education
Campus (SSD-10383)

Reference is made to correspondence from DPI&E dated 7 May 2020 requesting a response to issues in submissions raised with respect to the abovementioned state significant development.

No comments are made to this application by Council.

Should you have any further enquiries please do not hesitate to contact Diep Hang on [REDACTED] in relation to this matter.

Yours faithfully,

Michael Lawani
Coordinator Major Development Assessment



6 October 2020

Ms. Karen Harragon
Director, Social and Other Infrastructure Assessments
Department of Planning, Industry and Environment
Locked Bag 5022
PARRAMATTA NSW 2124

Attention: Prity Cleary

Dear Ms Harragon,

**RESPONSE TO SUBMISSIONS (RTS)
WESTMEAD CATHOLIC COMMUNITY EDUCATION CAMPUS REDEVELOPMENT
2 DARCY ROAD, WESTMEAD**

Thank you for referring the abovementioned application which was referred to Transport for NSW (TfNSW) for comment. TfNSW has reviewed the submitted information and provides the following comments specifically to the SIDRA analysis provided for the entire proposed development, inclusive of the proposed multi-story carpark:

- The proposed multi-deck carpark's signalised exit location currently has low demands, although this is expected to change and is confirmed by the submitted SIDRA analysis. Whilst the change does not appear to be significant, it is dependent on the input values adopted.

As such, impacts to surrounding classified network (including the transitway) and existing traffic signal site operations is not clear with the information provided in the RTS. TfNSW requires the electronic files to review and provide informed comment back to the Department in this regard.

TfNSW advises that the site may still need to be modified irrespective of a favourable SIDRA modelling review to bring the site to current standards. In particular, TfNSW note the proposed new pedestrian access and possible requirement for additional pedestrian safety features, phases, and a crossing on the eastern side of Darcy Road.

As such, to address the above, TfNSW request that the SIDRA model used for the submitted analysis be forwarded to TfNSW for review to confirm the signal settings used reflect those in practice on site or that may be proposed by TfNSW as well as to confirm whether any further modifications to the site would be required to facilitate for additional pedestrian movements.

Upon receiving the electronic SIDRA files, TfNSW will undertake a review and provide commentary back to the Department, along with suggested conditions of consent. However, it should also be noted that the modification and changes to the existing traffic signal site will require separate approval under Section 87 of the *Roads Act 1993*.

If you have any further inquiries in relation to this development application please contact Narelle Gonzales, Development Assessment Officer, on [REDACTED] or by email at: development.sydney@rms.nsw.gov.au.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'BEPeg'.

Brendan Pegg
Senior Land Use Planner
Planning and Programs, Greater Sydney Division



Our ref: DOC20/780981

Ms. Prity Clearly
Senior Planning Officer
Social Other Infrastructure Assessments
Department of Planning, Industry and Environment

By email: [REDACTED]

Dear Prity

Response to Submissions – SSD-10383 Westmead Catholic Community Education Campus

Thank you for your referral dated 22 September 2020 inviting comments from Heritage NSW (HNSW) in relation to the Response to Submissions, prepared for the proposed State Significant Development (SSD) 10383, Westmead Catholic Community Education Campus, Parramatta, NSW.

HNSW has reviewed all the Aboriginal heritage information supplied for the Westmead Catholic Community Education Campus development, including the *Response to Submissions* Report, prepared by Ethos Urban, dated September 2020; *Environmental Impact Statement*, prepared by Ethos Urban, dated March 2020; and *Aboriginal Cultural Heritage Assessment Report* (ACHAR), prepared by Comber Consultants, dated February 2020

HNSW provides its comments and recommendations at Attachment A.

If you have any questions regarding the above advice, please contact Rebecca Yit, Archaeologist at Heritage NSW, on [REDACTED] or [REDACTED]

Yours sincerely

Dr Samantha Higgs
Senior Team Leader
Aboriginal Cultural Heritage Regulation - North
Heritage NSW

Date: 1 October 2020

1. The Aboriginal cultural heritage values of the project area are not adequately described.

The ACHAR should be updated to adequately describe the material evidence of Aboriginal land use in accordance with the SEARs issued for the project and Section 2.2.3 of the *Guide to Investigating, Assessing and Reporting on Aboriginal cultural heritage in NSW*. HNSW is of the view that the assessment completed to date, does not adequately identify and describe the Aboriginal cultural heritage values that exist across the project area.

The ACHAR has assessed that there is moderate potential for preserved land surfaces (with the potential to contain Aboriginal objects) to be present beneath hard surfaces and/or introduced fill, and recommends archaeological test excavation be completed. HNSW guidelines state that the purpose of test excavation is to collect information about the nature and extent of sub-surface Aboriginal objects, based on a sample derived from sub-surface investigations. If test excavation is deemed necessary to characterise the nature of sub-surface deposits, this should be completed as part of the current assessment, so that Aboriginal cultural heritage values are adequately identified and described in the ACHAR. Furthermore, the test excavation results should inform the impact assessment and the development of appropriate conservation, harm avoidance or mitigation measures for the project. If archaeological test excavation is recommended to inform this process, this should be completed as part of the current pre-approval assessment¹. HNSW is not satisfied that the ACHAR and supporting documentation adequately meets the SEARs issued for the development.

The ACHAR also identifies there is the likelihood for contact period archaeology to occur within the potential subsurface archaeological deposit located within the project area. The Consultants assert the proximity of the project area to Parramatta Park and Government House is “likely to have been the scene of early contact between Aboriginal people and non-Aboriginal

¹ HNSW notes that this project is declared State Significant Development (SSD) and acknowledges that authorisation via an Aboriginal Heritage Impact Permit (AHIP) under Section 90 of the *National Parks and Wildlife Act 1974* (NPW Act) is not required for SSD that is **authorised by a development consent**. However, as project approval has not yet been granted for this project, the consent mechanisms under Section 90 of the NPW Act still apply. In this instance, if archaeological test excavation cannot be conducted without an AHIP under the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (because Aboriginal contact archaeological material is likely to be encountered within preserved land surfaces) the proponent must apply to HNSW for an AHIP to undertake test excavation. Any application for an AHIP to conduct test excavation must be supported by an ACHAR that includes a clearly articulated research design and test excavation methodology.

settlers” (Comber 2020:28). Based on the known archaeological record for the Parramatta CBD, HNSW concurs with the assertions made by Comber Consultants, however it should be noted, archaeological sub-surface excavation conducted under the Code is not excluded from the definition of harm in areas known or suspected to be in conflict or contact sites. HNSW requires the proponent to articulate and justify their position on this matter, given the consent mechanisms under Section 90 of the NPW Act apply, prior to SSD project approval under Section 89J of the *Environmental Protection and Assessment Act 1979*.

2. Please supply further information on the research design and test excavation methodology.

The ACHAR recommends test excavation be undertaken to determine the nature and extent of the subsurface deposit predicted to occur within the project area. A proposed test excavation methodology has been provided in the ACHAR framed on the standardised set of conditions documented in Requirement 16 of the *Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW* (the Code of Practice). HNSW requires the proponent supply additional information in the form of detailed mapping and supporting information, delineating the area of archaeological sensitivity and the locations of the proposed test pits. In the absence of this information, it is currently unclear how the proposed testing program would adequately sample and test the identified area of archaeological sensitivity within the project area. HNSW is of the view the information supplied does not currently meet the SEARs issued for the project and more specifically, Requirement 15 of the Code of Practice. The supplied methodology should be revised, and a tailored research design and test excavation methodology prepared that adequately meets the above requirements.

3. The impacts on Aboriginal cultural heritage values are not adequately assessed.

The ACHAR does not adequately identify and assess the potential impacts of the proposal on the Aboriginal cultural heritage values. This is partly because the Aboriginal cultural heritage values for the project area are not currently identified (refer to Recommendation 1), but also because the ACHAR does not adequately detail the proposed works and consider all potential impacts. HNSW understands that the works required for the demolition and excavation works (cut and fill, building and service infrastructure construction) are likely to result in significant sub-surface disturbance, however the impact assessment includes no discussion or assessment of these potential impacts on the Aboriginal cultural heritage values. HNSW is not satisfied that the ACHAR adequately identifies and assesses potential impacts of the proposal on Aboriginal cultural heritage values, in accordance with the SEARs for the project.

The ACHAR should be revised to clearly identify the nature and extent of the proposed activity and assess the potential for the activity to impact upon Aboriginal cultural heritage values, in

accordance with the SEARs and Section 2.5 of the *Guide to Investigating, Assessing and Reporting on Aboriginal cultural heritage in NSW*.

4. The ACHAR does not attempt to avoid impact or identify conservation outcomes.

With reference to Recommendation 3 above, the ACHAR does not demonstrate any attempt to avoid harm to Aboriginal cultural heritage values or consider sustainable conservation outcomes as required by the SEARs.

Consideration of harm avoidance or conservation outcomes within the ACHAR must be done in consultation with Aboriginal people and be informed by a clear understanding of the Aboriginal cultural heritage values for the project area, which is currently lacking. HNSW is not satisfied that the ACHAR adequately considers harm avoidance or considers whether conservation outcomes could be achieved for the project.

The ACHAR should be revised to demonstrate that harm avoidance or conservation outcomes have been considered for the proposed activity, in accordance with the SEARs and Section 2.6 of the *Guide to Investigating, Assessing and Reporting on Aboriginal cultural heritage in NSW*.

5. The proposed mitigation measures are not adequately described or justified.

The ACHAR recommends that archaeological test excavation (Stage 1) and subsequent salvage excavation (Stage 2) be undertaken to mitigate impacts to the Aboriginal cultural heritage predicted to exist within the project area. The ACHAR states, the “purpose of the Stage 1 test excavation is to determine whether archaeological evidence is present...determine integrity and significance...determine if sufficient triggers are present to necessitate the Stage 2 excavations (Comber 2020: 74).

The scope and rationale of the proposed mitigation measures are undefined, given that the Aboriginal cultural heritage values for the project area are not adequately identified as the above statement in the ACHAR acknowledges (refer to Recommendation 1) and it is unclear what is proposed to be tested and salvaged and to what extent. Furthermore, because the impact assessment is incomplete (refer to Recommendation 3), HNSW is unable to determine whether the proposed testing and salvage measures will appropriately mitigate potential impacts to Aboriginal cultural heritage. The development of management strategies to minimise harm must be done in consultation with Aboriginal people and cannot be undertaken until the Aboriginal cultural heritage values and potential impacts of the proposal are identified.

The ACHAR should be revised to demonstrate that management strategies to minimise harm have been developed in accordance with the SEARs and Section 2.7 of the *Guide to Investigating, Assessing and Reporting on Aboriginal cultural heritage in NSW*. If salvage

Attachment A

excavation is recommended, its scope should be clearly articulated, to demonstrate that the recommended strategy appropriately mitigates harm to Aboriginal cultural heritage.

Ms. Prity Clearly
Senior Planning Officer
Social Other Infrastructure Assessments
Department of Planning, Industry and Environment

By email: [REDACTED]

Dear Prity

Request for Advice – SSD-10383 Westmead Catholic Community Education Campus

I refer to your email dated 16 November 2020 requesting advice from Heritage NSW (HNSW) in relation to responses from Ethos Urban (dated 9 November 2020) and Comber Consultants (dated 10 November 2020), regarding previous advice (DOC20/780981-6) provided by HNSW for the above project.

HNSW have reviewed the responses and provide the following advice to DPIE:

1. Regarding the request by Ethos Urban to modify the project SEARs to allow test excavation to occur prior to determination, please be advised that HNSW will not support such a proposal. As clearly stated in our previous advice (1 October 2020), prior to project consent as a declared State Significant Development (SSD) under the EP&A Act, consent mechanisms under Section 90 of the NPW Act apply and an Aboriginal Heritage Impact Permit is required for test excavation to occur within the project area.
2. Regarding the request by Comber Consultants to allow testing and possibly salvage excavation as a condition of consent upon project approval. In considering the new information provided by Comber Consultants including an indicative test pit location plan, project area mapping and further details regarding the requirement to remove/demolish existing structures located within the area of archaeological sensitivity, HNSW now supports the proposed approach by Comber Consultants to conduct test excavation over a single excavation phase following demolition works. Comber Consultants assert that any test excavation undertaken prior to the removal of buildings would be impeded and limited in scope, HNSW supports these assertions and the request to allow test excavation to be undertaken post project approval through a condition of consent.

HNSW recommends that the ACHAR (Comber Consultants, February 2020) and more specifically the proposed test excavation methodology be updated to include the additional information prepared by Comber Consultants in their submission dated 10 November 2020, to ensure the proposed methodology as detailed in the ACHAR adequately meets requirement 15 of the *Code of Practice for Archaeological Investigation of Aboriginal*

Objects in New South Wales (DECCW 2010). A copy of the updated ACHAR should be provided to RAPs for their records in accordance with the *Aboriginal cultural heritage consultation requirements for proponents 2010* (DECCW 2010).

3. To address inadequacies in the ACHAR regarding proposed impacts on Aboriginal cultural heritage values (comment 3), HNSW recommends the ACHAR be updated to include the new information regarding proposed project works and supporting figures (Figures 1, 3 – 4) contained in the Comber Consultants submission. This will ensure the ACHAR adequately captures information regarding the proposed development works by identifying and documenting the potential impacts on Aboriginal cultural heritage in accordance with the SEARs for the project. A copy of the updated ACHAR should be provided to RAPs for their records in accordance with the *Aboriginal cultural heritage consultation requirements for proponents 2010* (DECCW 2010).
4. Following review of the additional information prepared by Comber Consultants, HNSW is satisfied that the concerns raised in our previous comments (points 4 and 5) have been adequately addressed. However HNSW does recommend that the ACHAR be updated to include the new information provided in the submission prepared by Comber Consultants (dated 10 November 2020) in response to HNSW comments (4 and 5), so as to ensure the ACHAR meets the SEARs for the project.

HNSW further recommends that an Aboriginal Cultural Heritage Management Plan (ACHMP) should be developed for the project in consultation with the RAPs, to manage and mitigate extant Aboriginal sites and objects that may be recovered from the archaeological excavation, to be undertaken within the project area. The ACHMP should recognise and acknowledge the continued Aboriginal connection of the project area to the Aboriginal community, linking into the proposed Aboriginal Heritage Interpretation Strategy to be developed and implemented for the project. It is hoped that this will ensure potential impacts on Aboriginal cultural values are managed and mitigated and facilitate ongoing Aboriginal community involvement and engagement in the conservation and celebration of Aboriginal heritage values associated with the Parramatta area.

5. It is understood from the information supplied to date, that all parties have agreed to Westmead Catholic Community school managing the long-term care and curation of any artefacts recovered from the project area. Comber Consultants have recommended that a Care Agreement between Westmead Catholic Community school and the RAPs be developed and an application for the transfer of Aboriginal objects for safekeeping, under the NPW Act prepared. To ensure the appropriate management of any recovered Aboriginal objects within the project area, the long-term care and control procedures for Aboriginal objects and obligations of all parties as detailed in the Care Agreement, should be integrated into an ACHMP, to be prepared for the project. HNSW recommends that a long-term management procedure be prepared for the project and integrated into the ACHMP.

If you require any further information regarding the advice, please contact Rebecca Yit, Archaeologist at Heritage NSW, on [REDACTED] or [REDACTED]

Yours sincerely

A handwritten signature in blue ink, appearing to be 'SH' or similar initials, written in a cursive style.

Dr Samantha Higgs
Senior Team Leader
Aboriginal Cultural Heritage Regulation - North
Heritage NSW

Date: 27 November 2020



9 December 2020

Ms. Karen Harragon
Director, Social and Other Infrastructure Assessments
Department of Planning, Industry and Environment
Locked Bag 5022
PARRAMATTA NSW 2124

Attention: Prity Cleary

Dear Ms. Harragon,

**SIDRA MODEL REVIEW
WESTMEAD CATHOLIC COMMUNITY EDUCATION CAMPUS REDEVELOPMENT
2 DARCY ROAD, WESTMEAD**

Thank you for referring the abovementioned application which was referred to Transport for NSW (TfNSW) for comment. TfNSW has reviewed the submitted SIDRA model and provides the following advisory comments for consideration:

- The additional demands at the intersection of Darcy Road and Catherine McAuley Street lowers the performance of Darcy Road. The provided SIDRA modelling indicates that a reduction of green time for Darcy Road is required.

The same distribution of green time can be accommodated for Darcy Road if Catherine McAuley Street has two exit lanes, one of these as an exclusive left turn lane. This allows the right turn to leave the site unimpeded without being disrupted by left turning vehicles waiting for pedestrians.

- The impacts of Hawkesbury Road and Darcy Road are to include the Parramatta Light Rail (PLR). **Attachment A** indicates the proposed layout for Hawkesbury Road and Darcy Road with PLR, time settings and phasing, which should be included in the modelling.
- The SIDRA model shows delays in Hawkesbury Road and Alexandra Avenue increasing from 71 secs/veh to 212 secs/veh for a future 2023 AM scenario. This is not identified in the report nor any mitigation measures suggested.
- The future 2023 PM model also includes an internal dummy intersection of an additional 600 two-way vehicles which are not linked to any other intersection.

TfNSW requests that the proponent reviews the above and provides a response back to TfNSW addressing the above comment. Once received, TfNSW will undertake a review and provide commentary back to the Department, along with suggested conditions of consent. However, it should also be noted that the modification and changes to the existing traffic signal site will require separate TfNSW approval under Section 87 of the *Roads Act 1993*.

If you have any further inquiries in relation to this development application please contact Narelle Gonzales, Development Assessment Officer, on [REDACTED] or by email at: development.sydney@transport.nsw.gov.au.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'BEPeg'.

Brendan Pegg
Senior Land Use Planner
Planning and Programs, Greater Sydney Division

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

Attn: Ms Prity Cleary

09 March 2021

Dear Ms Cleary,

**FURTHER TRAFFIC COMMENTS – 2 DARCY ROAD, WESTMEAD (SSD-10383)
WESTMEAD CATHOLIC COMMUNITY EDUCATION CAMPUS**

I refer to your request for Council officers to review the proponent's response to the independent peer review of the traffic assessment.

In response, Council officers wish to reiterate our previous concerns and provide additional comments as outlined below.

Traffic Volumes/Modelling

The peak arrival traffic volumes, which form the basis of the modelling scenarios, rely on 40% of primary school children using the OOSH. This is considered unachievable particularly in the AM peak when school and work travel tends to be compressed into a shorter period than the PM peak. Similarly, the modelled 10% improvement in modal split for the primary school is optimistic, particularly as its catchment area will increase beyond the existing. These estimates have not been demonstrated as achievable or reasonably reflective of the operation of other similar facilities. Council notes that there is no mechanism to compel the school or parents to meet these targets. As such, the modelling scenarios do not accurately reflect the impact of the proposal.

Further Comments:

The applicant's response states that Government schools in Western Sydney are showing OOSH usage rates in the order of 20 - 30% while other primary schools adjacent to growth precincts and hospitals such as schools in the Ryde area show higher uptake. The response also indicates that OOSH usage rates of Truscott Street Primary and North Ryde Public School were identified 29% and 33% respectively. On this basis, the response claims that based on the projected growth for the Westmead Precinct and the proximity of the site to Westmead Hospital, the proposal assumes that 40% of students will attend OOSH. However, the response did not provide evidence to show how this OOSH percentage can be achieved. It is considered that this will not be achieved. It is noted that the assumption of 40% OOSH usage rate is one of the fundamental assumptions in the modelling scenarios and failing to achieve the 40% OOSH usage rate will result in the modelling scenarios not accurately reflect the impact of the proposal.

Contact us:

council@cityofparramatta.nsw.gov.au | 02 9806 5050
@cityofparramatta | PO Box 32, Parramatta, NSW 2124
ABN 49 907 174 773 | cityofparramatta.nsw.gov.au

Your Reference SSD-10383

Our Reference NCA/8/2019

Contact Myfanwy McNally

Telephone [REDACTED]

Email [REDACTED]

Intersection of Bridge Road and Darcy Road

The proposed SSD will increase traffic volumes at many intersections in the precinct as previously advised within Council's EIS submission.

The proposed SSD has a significant impact on the intersection of Bridge Road and Darcy Road. The level of Service for the 2033 scenarios in the PM peak, show a deterioration from C to F resulting from the development (assuming 10% model split change and 48% of students using the OOSH). As previously advised and illustrated within the draft Westmead Innovation District Masterplan this issue could be addressed by providing a direct connection from Bridge Road to the school, thereby removing some traffic from the intersection of Bridge Road and Darcy Road.

The link from Bridge Road into the school site is achievable and is critical. The adjacent site to the west, required to deliver this link, is owned by the State Government and opportunity exists for the proponent and the land owner to work collaboratively to address traffic congestion issues, which may well be mutually beneficial. There is already a driveway on the land in the approximate location that the link could be constructed, and there are not considered to be any other insurmountable factors preventing construction of the link to connect to Bridge Road.

Further Comments:

The link from Bridge Road to Westmead Catholic Community Education Campus suggested by Council will reduce traffic volumes travelling through the intersection of Bridge Road/Darcy Road/Coles and therefore provides an efficient reduction in delays on the road network. The applicant's modelling for future conditions at this intersection shows a poor level of service, however traffic conditions would be subject to the nature of the development that occurs on the south eastern corner of this intersection and conditions could be worse than the applicant's forecast during peak times for the schools.

The applicant's position is that it would allow a pedestrian access to its site from Bridge Street, but the link across the land to the west of its site would need to be organised by others (in some places in the report it is not clear if it would only be for pedestrians or whether vehicles could also access the site).

This link should be a vehicle access for reasons previously outlined. However, it should be noted that even as a pedestrian link it has benefits in reducing traffic congestion. This is because some parents may choose to pick up and set down in Bridge Road, with the student using the pedestrian link to access the school, thereby reducing vehicle movements at the intersection of Bridge Road/Darcy Road/Coles. Furthermore, shortening the travel distance may encourage walking as a mode of transport.

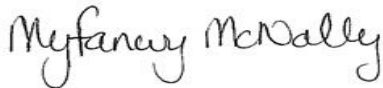
The applicant's additional work has not satisfactorily addressed Council's concerns and our position that the access should be secured as part of this application remains.

It is noted that Council has also recently been asked to comment on the Westmead 2036 Draft Place Strategy. The draft response which is due to be considered by Council on the 22nd March raises concerns in relation to development and traffic issues and specifically requests the link providing vehicle access from Bridge Road to the Westmead Catholic Community Education Campus be included in the plan.

Council thanks you for the opportunity to comment on the above matter.

Please contact me if you have any enquiries.

Yours sincerely,



Myfanwy McNally
Manager - City Significant Development



29 March 2021

Ms. Karen Harragon
Director, Social and Other Infrastructure Assessments
Department of Planning, Industry and Environment
Locked Bag 5022
PARRAMATTA NSW 2124

Attention: Prity Cleary

Dear Ms Harragon,

**WESTMEAD CATHOLIC COMMUNITY EDUCATION CAMPUS REDEVELOPMENT
2 DARCY ROAD, WESTMEAD**

Thank you for meeting with Transport for NSW (**TfNSW**) on 22 March 2021 to discuss the findings of the Department's peer review into the Transport Impact Assessment (**TIA**) submitted as part of SSD-10383 Westmead Catholic Community Education Campus redevelopment. TfNSW has reviewed the peer review and provides detailed commentary in **TAB A** for the Department's consideration.

TfNSW advises that the findings of the Department's peer review and comments provided by TfNSW in **TAB A** still need to be addressed by the proponent. Currently, TfNSW is not satisfied that the proposed development's traffic generation will not have an impact on the surrounding classified road network. Considering that the surrounding classified network includes the bus transitway and Parramatta Light Rail (PLR), it is imperative that the transport and traffic matters are adequately addressed by the proponent, including suggested mitigation measures to ameliorate impacts to the transport network.

If you have any further inquiries in relation to the above please contact Brett Morrison, Development Assessment Officer via email at: development.sydney@transport.nsw.gov.au.

Yours sincerely,

Brendan Pegg
Senior Land Use Planner
Planning and Programs, Greater Sydney Division

TAB A

SIDRA Modelling

- TfNSW believes that the technical note provided by the proponent on the SIDRA modelling calibration methods was calibrated by adjusting the cycle times to match the queue lengths. From this, it seems that apart from applying isolated bunching factors, all other parameters use default values. This results in being a poor correlation between the observed and computed generated queue lengths.

To adequately assess the potential impacts of a development the base case model must replicate observed street conditions.

- The proponent SIDRA's model does not provide any confidence to TfNSW that the proposed development's future traffic generation will not impact the surrounding classified network for the following reasons:
 - There are several input parameters, performance measures, and calibration requirements described in the SIDRA User Guide, Section 2.6.2 – 2.6.4 that were not followed.
 - A comparison of queue lengths between observed and modelled, shows a poor correlation due to not adhering to standard calibration procedures.
 - Base and future intersections do not use the current intersections maximum cycle length but have adopted the cycle length operating at the time of inspection.
 - The phase sequencing in the model is not in line with current operations.
 - Key input values that have a significant effect on results were not consistent with existing operations eg Walk times incorrect and coordination setup incomplete.
 - Existing Maximum Phase Splits were not used.
 - As detailed in Austroads Guide to Traffic Management Part 3 Traffic Studies and analysis, page 6 models also need to be validated. This is the verification of a model against information independent of that used to calibrate the model. The applicant has not considered model validation or at least provided evidence of model validation.
 - The analysis does not include the PLR at the intersection of Hawkesbury Road and Darcy Road. This is a major omission as this intersection may be the critical intersection within the study area and dictate cycle lengths for sites linked to it.
 - The model indicates delays in Hawkesbury Road and Alexandra Avenue increasing from 71 secs/veh to 212 secs/veh for a future 2023 AM scenario.
 - The future 2023 PM model also includes an anomaly with an internal dummy intersection of an additional 600 two-way vehicles not linked to any other intersection.

Green Travel Plan (GTP)

- TfNSW advises that in order to achieve the outcomes of the proposed GTP, it requires a comprehensive committed evidence-based strategies and actions to achieve those targets and an appropriate commitment from the proponent to deliver them. TfNSW Travel Demand Management team has advised that additional actions and strategies need to be further developed as the current GTP will not achieve the outcomes suggested.

Mitigation

- Site observations indicate that the road network surrounding the subject site is currently operating at levels above capacity, with particular impact on the Darcy Road and Catherine McAuley Street. SIDRA modelling suggests Darcy Road and Catherine McAuley Street. TfNSW is concerned that the additional traffic generated combined with the additional pedestrian movements (which are vulnerable primary school students), poses significant road safety concerns and is not acceptable to TfNSW.
- TfNSW address the network safety and efficiency issues identified at Darcy Road and Catherine McAuley Street, noting that any changes to the signalised intersection would require approval under Section 87 of the *Roads Act 1993* and as such the proponent is encouraged to discuss potential options with TfNSW.



**Transport
for NSW**

Our Reference: SYD19/01450/12
DPIE Reference: SSD-10383

26 October 2021

Ms. Karen Harragon
Director, Social and Other Infrastructure Assessments
Department of Planning, Industry and Environment
Locked Bag 5022
PARRAMATTA NSW 2124

Attention: Aditi Coomar

Dear Ms Harragon,

**WESTMEAD CATHOLIC COMMUNITY EDUCATION CAMPUS REDEVELOPMENT
2 DARCY ROAD, WESTMEAD**

Thank you for requesting Transport for NSW (TfNSW) to review the Response to Submissions (Rts) for Westmead catholic Community Education Campus (SSD-10383).

TfNSW has reviewed the submitted RtS and provides the Department comments for consideration in **TAB A**.

If you have any further inquiries in relation to the above, please contact Brett Morrison, Development Assessment Officer via email at: development.sydney@transport.nsw.gov.au.

Yours sincerely,

A handwritten signature in black ink, appearing to read "B. Pegg".

Brendan Pegg
Senior Land Use Planner
Planning and Programs, Greater Sydney Division

Transport for NSW

27-31 Argyle Street, Parramatta NSW 2150 | PO Box 973, Parramatta NSW 2150

P (02) 8265 6962 | **W** transport.nsw.gov.au | ABN 18 804 239 602

TAB A

Comment:

The RtS states in section 2.1 that “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”.

TfNSW notes that the Applicant's traffic consultant and the Department's independent consultant has determined that the intersection of Darcy Road / Bridge Road / Coles Carpark operates satisfactory in 2023 (based on assumed background growth), however it would operate unsatisfactory in 2033.

Whilst the delivery of significant public transport infrastructure in the Westmead precinct (Sydney Metro and Light Rail) is expected to encourage the uptake of public transport and reduce potential vehicle trips, it cannot be assumed that the intersection of Darcy Road / Bridge Road / Coles Carpark will operate satisfactory in 2033.

Recommendation:

TfNSW recommends that should the modelling assumptions be correct then the development's traffic generation would have an unsatisfactory impact on Darcy Road / Bridge Road / Coles Carpark intersection, which would require some mitigation works.

Mitigation measures cannot be determined for future years at Darcy Road and Coles Carpark, as the Applicant has not been able to demonstrate that their traffic model is fit for purpose. As such, TfNSW recommends that the Applicant should be conditioned with:

Within 6 months of the commencement of operation of the school with 600 school students, 15 FTE staff and 100 CELC students, the Applicant must undertake a traffic assessment which

- (a) is prepared by a suitably qualified traffic consultant, in consultation with TfNSW and Council;*
- (b) identifies the school and CELC peak traffic periods*
- (c) include details of baseline conditions and modelling methodology, as agreed with TfNSW (with appropriate evidence provided of such agreement);*
- (d) includes traffic counts and surveys (for at least three consecutive standard school days as agreed by TfNSW) to provide details of traffic generation due to the operation of the school in the identified AM and PM school periods;*
- (e) includes modelling of the Darcy Road / Bridge Road / Coles Carpark intersection (using an appropriate traffic modelling tool such as SIDRA or equivalent) based on the above traffic generation data and baseline conditions (as agreed with TfNSW);*
- (f) includes calibration and validation of the model to enable a critical assessment of the traffic impacts of the above intersection;*
- (g) demonstrates in the validation, that the model meets the requirements of TfNSW Traffic Modelling Guidelines;*
- (h) satisfactorily validates the model for the various school time periods of the day in accordance with the procedures set out in the TfNSW Traffic Modelling Guidelines;*
- (i) includes details of the level of service (LoS) of the above intersection as a result of the modelling;*
- (j) compares the traffic surveys/generation results and against the data submitted in the Transport & Accessibility Impact Assessment Report prepared by The Transport Planning Partnership dated 25 August 2021 (TAA) to verify that the LoS of the above intersection is consistent with the results in the TAA; and*
- (k) includes additional management/mitigation measures at the Darcy Road / Bridge Road / Coles Carpark intersection to optimise road safety in accordance with TfNSW, Austroads guidelines and Australian Standards (including upgrades if necessary), if the traffic assessment concludes that the performance of this intersection is lower than that predicted by the TAA, and the traffic generated by this development is a contributing factor to the deteriorated LoS.*

Comment:

Section 4.3 of the RtS states that “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”

Transport for NSW

27-31 Argyle Street, Parramatta NSW 2150 | PO Box 973, Parramatta NSW 2150

P (02) 8265 6962 | W transport.nsw.gov.au | ABN 18 804 239 602

Recommendation:

TfNSW requires all civil works at the Darcy Street and Main Entrance, and Darcy Road and Catherine McAuley must be implemented prior to issue of a Completion Certificate.

TfNSW recommends that the Applicant is conditioned to the following:

The modifications to traffic control signals (TCS) at the intersection of Darcy Road and Catherine McAuley are to meet TfNSW requirements and obtain TfNSW approval under section 87 (4) of the Roads Act 1993.

The submitted design shall be in accordance with Austroads Guide to Road Design in association with relevant supplements. The certified copies of the civil design plans shall be submitted to TfNSW for consideration and approval prior to the release of a Completion Certificate and commencement of road works.

Transport for NSW

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P (02) 8265 6962 | **W** transport.nsw.gov.au | ABN 18 804 239 602

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

Your Ref SSD-10383

Our Ref NCA/8/2019

Contact Paul Sartor

Telephon [REDACTED]

Email [REDACTED]

1 November 2021

ATTN: ADITI COOMAR,

COUNCIL SUBMISSION

NOTICE OF EXHIBITION OF RESPONSE TO SUBMISSIONS FOR THE WESTMEAD CATHOLIC COMMUNITY EDUCATION CAMPUS (2 DARCY ROAD, WESTMEAD)

I refer to the above application and the request to provide advice on the proponent's third *Response to Submission Report*. Council staff has reviewed this additional work and are generally satisfied with the report.

Council's Traffic and Transport do not agree with the following statement from pg. 3 of the "Response to additional information and design amendments" prepared by Ethos Urban:

"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."

The statement that 'suitable mitigation measures have been proposed' regarding the Darcy Road – Bridge Road – Coles Car Park intersection is not supported.

Council would like to thank the applicant for their continued collaboration. As raised in our previous response of the 27th September 2021 we look forward to reviewing any draft conditions of consent. Should these address the issues raised in our previous response, Council would be able to remove our current objection.

It is noted that this is the recommendation of Council officers and this submission has not been endorsed at a Council meeting.

Contact us:

council@cityofparramatta.nsw.gov.au | 02 9806 5050
@cityofparramatta | PO Box 32, Parramatta, NSW 2124
ABN 49 907 174 773 | cityofparramatta.nsw.gov.au

Should you wish to discuss the above matters, please contact Paul Sartor on the details listed above.

Yours sincerely

A handwritten signature in cursive script that reads "Myfanwy McNally".

Myfanwy McNally
CITY SIGNIFICANT DEVELOPMENT MANAGER