SSD 9477 CATHERINE FIELD PRIMARY SCHOOL

Response to Submissions

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SSD 9477 Catherine Field Primary School Response to Submissions
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3	Final RtS, amended to respond to DPIE feedback dated 17/04/20	James Arnold	Sarah Ng	James Arnold	01/05/2020

Approval for issue

James Arnold		1 May 2020

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Appendix S Approved Southern Road Plans (DA/2017/491/1)

1 INTRODUCTION

This Response to Submissions (RtS) Report addresses the matters raised in the submissions received during the public exhibition of the State Significant Development (SSD) application No. 9477. The SSD is for the proposed Catherine Field Primary School located at O'Keefe Drive, Oran Park. The proposed development is for a new public primary school that will accommodate 1,012 students, including 44 classrooms, a hall, an administration/staff centre, library resource centre, amenities and storage, staff car parking and site services.

The SSSA was submitted to the Department of Planning, Industry and Environment (DPIE) on 5 November 2019. Public exhibition of the SSDA was undertaken from 14 November 2019 to 11 December 2019. Submissions were received from:

- Department of Planning, Industry and Environment;
- Camden Council;
- Endeavour Energy;
- Water NSW;
- Transport for NSW (TfNSW);
- NSW Environmental Protection Authority (EPA);
- Heritage Council of NSW;
- Harrington Estate; and,
- The general public

The project team has reviewed the submissions and responded to the issues raised. This RtS report summarises the responses, provides a response comment, and, where relevant, refers to a technical report where the issue has been addressed.

2 PROPOSED AMENDMENTS

In response to the issues raised in the submissions, the project team has made amendments to the proposal. The amendments are also in response to feedback received from the Government Architect of NSW (GANSW) during the State Design Review Panel Process, as presented in the advice dated 9 October 2019.

The following amendments have been made:

- The glazing modules have been updated on the northern façade of block A;
- The stair in front of the lift has been reconfigured;
- Minor roof amendments have been made between blocks A & B and blocks B & C and C & D;
- Plant louvres on block B at ground floor are now setback from the corner of the south-eastern façade;
- Vertical aluminium blades have been added to the eastern elevation at level 02 walkway;
- Block A, B, C and D glazing modules updated with additional louvres;
- Glazing updated on Block A and E;
- Blocks A, B, C and D glazing modules updated with additional louvres to increase natural ventilation;
- Portions of ceilings have been raised where possible in homebases in response to GANSW feedback;
- Car park revised to include accessible parking locations;
- Site plan updated to incorporate 70 bike parking spaces;
- Fencing facing southern road revised to be 1 metre in board from boundary;
- Gross Floor Area plan included within drawing set; and,
- Clarification of construction hours to Monday to Friday 7am-6pm, Saturday 7am-3pm to align with the construction methodology outlined in the Construction Management Plan. This is to consider deliveries of heavy machinery and materials, and conform with overriding requirements of the RMS. No construction will occur between 7-8am, and 1-3pm on Saturdays.

3 RESPONSE TO SUBMISSIONS

The SSDA was on public exhibition from 14 November 2019 to 11 December 2019. During this time, government agencies, the City of Camden, key infrastructure stakeholders and the community were invited to provide comment on the project to DPIE.

During exhibition, a total of 10 submissions were received. Of these submissions, 7 were from government agencies (including DPIE and Council), 1 from an organisation and 2 from the public.

Agency submissions were received from:

- Department of Planning, Industry and Environment;
- Camden Council;
- Endeavour Energy;
- Water NSW;
- Transport for NSW (TfNSW);
- NSW Environmental Protection Authority (EPA); and,
- Heritage Council of NSW.

3.1 Government Agency Submissions

3.1.1 Department of Planning, Industry and Environment

Issue	Comment	Response	Reference
Built Form	Request to provide justification and confirmation engagement with Government Architect of New South Wales has been met. This includes comments provided during the State Design Review Panel Process, as presented in the advice dated 9 October 2019, have been incorporated into the design.	SINSW and the project team have continuously consulted with GANSW at multiple occasions prior to the SSDA. The design has incorporated advise dated 9 October 2019, outlined in Appendix P.	GANSW Consultation Letter Reference Appendix P
Car parking	Request for clarification where assessible spaces are located in car park and whether this will impact total number of car spaces.	68 total car parking spaces. This is 66 + 2 accessible car parking spaces. Location shown on Architectural Plans in Appendix G.	Architectural Plans Appendix G
Building height	Justification of height non-compliance and its impact on future residential areas located to the east and south of site.	The applicable planning controls for the height of the proposed school are as follows: • SEPP (Sydney Region Growth Centres) 2006 – Appendix 9 Camden Growth Centres Precinct Plan – Clause 4.3 – maximum Height of Buildings that applies to the subject site is 9 metres. • SEPP (Educational Establishments and Child Care Facilities) 2017 – Part 4 Schools – Clause 42 – *Development consent may be granted for development for the purpose of a school that is State significant development even though the development would contravene a development standard imposed by this or any other environmental planning instrument under which the consent is granted.* In accordance with Clause 42 of the Education SEPP, consent may be granted to the SSDA even though it contravenes the building height development standard. This provision provides the consent authority (ie. DPIE) the legal powers to grant consent to the proposed school even if though breaches the height of buildings development standard contained in the Growth Centres SEPP (this is a similar legal authority that Clause 4.6 Variation Requests provide consent authorities to grant consent). It is acknowledged however, that this provision does not imply that the	Shadow Diagrams Appendix Q Response to Harrington Submission Appendix R

Issue	Comment	Response	Reference
		height control and its objectives need not be considered, and as such a comprehensive justification for the proposed school height is provided below. The maximum height of the proposed school is 14.96 metres as measured the top of the clerestory pop-up windows on Block C. This exceeds the maximum height of 9m for the site. Despite the variation, the proposal is considered to achieve the objectives of the height clause as discussed below. *(a) to establish the maximum height of buildings,* Comment: This objective is achieved as the height control establishes the maximum height of buildings. *(b) to minimise visual impact and protect the amenity of adjoining development and land in terms of solar access to buildings and open space* Comment: The school site is a stand-alone urban block in a low density residential area. Even though it is subject to the low density residential controls being in an R2 zone, the school is a unique development and stand-alone site which would be expected to have a different character, presence and scale to the surrounding area. Accordingly, the height of the school would not appear out of character with the surroundings or have an adverse visual impact on the area. The shadowing impacts on the existing and future dwellings surrounding the site are easily compliant with the CGC DCP control for solar access and the minor impact is limited to a brief period of the year around June 21. *(c) to facilitate higher density development in and around commercial centres and major transport routes* Comment: Not applicable as the site is not located in a commercial centre of or on a major transport route.	

Issue	Comment	Response	Reference
		In addition to achieving the objectives of the height control, there are strong planning merits to justify the height variation as follows: • The shadows of the proposed development will not impact the principal private open space (PPOS) of the future dwellings south of the site and the height variation does not lead to any non-compliance with solar access controls (refer to Appendix R for further details); • The shadows of the proposed development will impact only a small number of lots (approximately 2-3) to the east of the site. This overshadowing will be minimal, only occurring past 2pm at mid winter (June 21), enabling full solar access between 9am and 2pm which complies with the solar access controls within the CGC DCP (refer to shadow diagrams in Appendix Q); • The school site is a stand-alone urban block in a low density residential area. Even though it is subject to the low density residential controls being in an R2 zone, the school is a unique development and stand-alone site which would be expected to have a different character, presence and scale to the surrounding dwellings. Accordingly, the height of the school would not appear out of character with the surrounding area; • The school should act as a landmark site and development for the local area, and to achieve this, urban design principles would suggest that additional height is warranted; • The additional height allows for a three storey school to be provided which results in a smaller building footprint, a more efficient design, more outdoor play space and more landscaped areas. This provides for an improved quality school and better streetscape outcome; • The more compact three storey footprint is essential to achieve the Department of Education's requirements for the area of the outdoor play space and the sports field dimension requirements. Any reduction in the number of storeys would require an expansion of the building footprint, eating into the required outdoor play space and resulting in an undersized sports field. This would result in the school's capacity having	

Issue	Comment	Response	Reference
		to be commensurately reduced which would be to the detriment of the local area and not in the public interest; • The maximum height of 14.96m is measured to the top of the clerestory windows on Block C. These pop-up windows are minor building elements which extend above the main roof line which has a lower height of 13.9 metres. The front roof line of Block A is compliant at 8.08m and Block B is 14.2m. Accordingly, the perceived height of the buildings is closer to 14m rather than 14.96m; • The school buildings are comfortably setback from the boundaries by 6.2m to 9m which creates comfortable separation from the nearest dwellings. The closest dwellings to the non-compliant Block B and C will be the future dwellings opposite the southern road and the eastern road. Assuming those dwellings provide a compliant 4.5m front setback, the separation will be 27.3m to 29.9m; • The building massing is broken down into a series of buildings to create breaks in the built form and a fine grain street pattern. The buildings will be screened by a significant landscaping strip on the southern frontage. The materials and finishes used have been chosen to complement the surroundings. These design measures will serve to visually soften and screen the school, minimising perceived bulk and scale; • The NSW Government Architect provided support to the scale (ie. bulk and height), specifically supporting the following design aspects: 1. *Overall masterplan, clarity of site plan and design principles;* 2. *Civic presence and scale of the buildings;* 3. *Permeability of the school grounds from the street and potential connection to future open space to the north* 4. *Holistic approach to topography, siting of buildings hydrology and vegetation.* Please see further detail regarding impacts to residential developments south of the proposal in Section 3.2.1 of this report.	

Issue	Comment	Response	Reference
Fencing	Request for further information on proposed fencing of the site including location, height and type of fencing. Question to demonstrate the suitability of fencing, i.e. its character and location	The SINSW School Security Unit (SSU) have confirmed that the school requires a standard 2.1 metre high diplomat palisade school fence, this is a mandatory requirement for inclusion in this school by DoE and has been positioned generally along the boundary line with the positioning shown in the Architectural Plans in Appendix G. This type of fencing is considered to be consistent with the design of the school and character of the area.	Architectural Plans Appendix G
Rainwater tank	Confirmation of location and water collection method of rain water storage tank.	100,000L in-ground rainwater tank is being provided as part of the proposal. This will collect via roof catchments. Location of rainwater tank is identified on the Civil Plans.	Civil Plans Appendix A Water Conservation Appendix O
Roads	Request for further detail on future Road 610 and 3301 including design, responsible delivery party, interim accessibility measures as per the SEARS.	Roads 610 and 3301 are not part of the projects approval request and are being provided by the local developers Greenfield and Harrington's respectively. Ongoing discussions are yet to be resolved with the developers of the neighbouring sites regarding the timing of the roads. Further information will be provided to DPIE once this issue has been resolved. A copy of the approved plans for the southern road No. 610 is held in Appendix S.	Appendix S Approved Southern Road Plans
Construction – parking	Confirm parking arrangements for construction workers and whether parking would be on site, or alternative arrangements are made to avoid impacts on roads.	Car park location is on site during construction works. Construction workers will be encouraged to carpool or utilise public transport services within the area. According to the traffic impact assessment in the SSDA, construction traffic flows will not result in adverse impacts on the operational capacity of the surrounding road network. Please refer to Appendix N for construction vehicle routes. SINSW anticipates a detailed Construction Traffic Management Plan will form a condition of approval, in accordance with the Department's standard conditions.	Construction Management Plan Appendix N
Bicycle parking	Confirmation on bicycle parking spots on site for students and teachers	70 Bicycle parking spots are allocated on the site for use by students and teachers. Refer to Site Plan Drawing in Architectural Drawings.	Architectural Plans Appendix G

Issue	Comment	Response	Reference
Shared use	It was noted the application included shared use of school buildings and grounds by the community outside of school hours. Request for a detailed schedule listing the school facilities used and types of functions/activities to be carried out. This should also include maximum occupancy and hours/days of operation.	The school does not have any formal arrangements of community use outside of school hours. Future joint use of the school will be considered by DoE following construction of the project.	
Waste	Confirmation of waste collection area. SSDA Appendix B and E indicate the waste pad would be located on the north west corner of the staff car park, whilst Appendix W indicated it would be south east of the staff car park.	Amendment to Waste Management Plan made to confirm consistency with other plans.	Waste Management Appendix M
Rainwater tank Solar PV systems	Request for clarification on the inclusion of rainwater harvesting and solar PV systems	100,000L in-ground rainwater tank is being provided as part of the proposal. This will collect via roof catchments. A 70 kW PV system is located on the hall and as per DoE EFSG requirements.	Architectural Plans Appendix G
Stormwater	Section 6.8 of the EIS referenced Appendix G Stormwater Design Report. Request for this document.	Stormwater Design Report Attached. File may have been corrupted in SSDA application.	Stormwater Design Report Appendix O
Staging	Request for illustrated staging plan and works involved.	All proposed works are to be completed in a single stage.	
Construction - access	Request for details surrounding direct access off O'Keefe Drive during construction.	During construction of the proposal, the contractor and construction vehicle parking will access via the designated construction gate on O'Keefe Drive. This is the shortest route between local and regional road works, therefore reducing the traffic impacts during construction. Construction workers will be encouraged to carpool or utilise public transport services within the area. According to the traffic impact assessment in the SSDA, construction traffic flows will not result in adverse impacts on the operational capacity of the surrounding road network. Please refer to Appendix N for construction management plan and construction vehicle routes. SINSW anticipates a detailed Construction Traffic Management Plan will form a condition of approval, in accordance with the Department's standard conditions	Construction Management Plan Appendix N

Issue	Comment	Response	Reference
Construction – work zones	Confirmation work zones are required as part of the proposed development application.	Work zones are on the eastern kerb of O'Keefe Drive.	Construction Management Plan Appendix N
RtS Draft 1 Feedback	DPIE review and response to RtS Draft 1 – email from Jasmine Tranquille dated 6 March 2020	DPIE feedback is addressed below.	
• Various Issues	Request for key issues listed in letter issued by DPIE on 20 December 2019 are resolved. It is recommended to provide a revised RtS including responses to key issues and revised appendices where needed/	Noted. Responses are provided in the remainder of the table above.	
• Architectural Plans	Built Form and Design Changes are proposed. Request for updated architectural plans and an updated design report to reflect the proposed changes. The architectural plans included in the SSDA were in 'draft'. Request for revised final plans (full set)	Noted. Architectural Plans have been updated.	Architectural Plans Appendix G
• Earthworks	Bulk excavation and site establishment works are now part of the SSD, we require further information about those works including plans showing proposed works and the relationship with DA/2019/928/1 currently lodged with Camden Council.	The Bulk Excavation and Site Establishment Works were originally to be included into the SSDA as part of the RtS Draft 1, however since that time, the Early Works DA (DA/2019/928/1) was approved on 27 April 2020. Accordingly, the early works are no longer to be included in the SSDA as per the original proposal.	Early works Approved Plans Appendix D
• Gross Floor Area	Details regarding total gross floor area for the development	Gross Floor Area Plans are found in the Architectural Drawings Appendix G	Architectural Plans Appendix G
• Landscape	Request for confirmation on number of trees proposed to be planted on site.	A minimum of 42 trees of varying heights and types are allocated on the proposal. These are outlined in the landscape plans in Appendix J.	Landscape Plans Appendix J
• Bicycle parking	Confirmation on number of bicycle parking spaces provided on site, and location on architectural plans	70 Bicycle parking spots are allocated on the site for use by students and teachers. Refer to Site Plan Drawing in Architectural Drawings Appendix G.	Architectural Plans Appendix G
• Car parking	Request for clarification where assessible spaces are located in car park and whether this will impact total number of car spaces.	68 total car parking spaces. This is 66 + 2 accessible car parking spaces. Location shown on Architectural Plans Appendix G.	Architectural Plans Appendix G
RTS Draft 2 Feedback	DPIE review and response to RtS Draft 2 – email from Jasmine Tranquille dated 17 April 2020 and 29 April 2020.	DPIE feedback is addressed below.	
• Bulk excavation and site establishment works	These proposed works modify the application; thus, we need an assessment of the environmental impacts of the works and the cumulative impact.	The Bulk Excavation and Site Establishment Works were originally to be included into the SSDA as part of the RtS Draft 1, however since that time, the Early Works DA (DA/219/928/1) was approved on 27 April 2020. Accordingly, the early works are no	Early works Approved Plans Appendix D

Issue	Comment	Response	Reference
		longer to be included in the SSDA as per the original proposal and therefore no assessment is required.	
• Overshadowing	Provide hour by hour shadow diagrams, notate the dimensions and any indicative lot layout on the future residential areas located to the east and south of the site.	A range of hour by hour shadow diagrams are held Appendix Q. These shadows diagrams provide three different options for the possible layouts of the future dwellings to the south and one option for the future dwellings to the east. These options are based on the applicable planning controls for the sites and represent the likely development outcomes. The shadow diagrams labelled 'Front POS Dwelling Scenario to South' contains the most detail as this was specifically prepared to address the concerns of the adjoining developer to the south - Harrington Estate. Please refer to that diagram for notations and dimensions. Further information and detailed analysis of the shadowing is also contained in the Letter to Harrington in Appendix R. In addition, the approved plans for the southern road have been provided to show dimensions of that road approved under the 'Harrington DA' DA-2017/491 and to be constructed by that developer held in Appendix S	Appendix Q Shadow Diagrams Appendix R Response to Harrington Submission Appendix S Approved Southern Road Plans (DA-2017/491/1)
• Parking	Confirm the total number of parking spaces, as the RtS refers to 68 spaces while the architectural plans show 67 spaces.	It is confirmed that the total number of car parking spaces is 68 including 2 accessible spaces. The location of the 68th space was unclear on the previous iteration of the plans, it is now clarified and appropriately line marked on the revised plans held in Appendix G.	Appendix G Architectural Plans
• Waste	Appendix M Waste Management Plan has been updated to reflect the waste collection location. Within this plan Appendix A still refers to the former waste collection zone, could this be revised.	The Waste Management Plan has been updated show the new waste collection location (as shown within Appendix A of the WMP). Refer to Appendix M.	Appendix M Waste Management Plan
• Stormwater	Provide a copy of the Stormwater Design Report, including indicative stormwater design.	There may have been transfer issues. The Concept Stormwater Design Report was provided in Appendix F.	Appendix F EIS Concept Stormwater Design Report
• Landscape	Confirm if a planting schedule will be provided as part of the RtS.	There may have been transfer issues. The Landscape Plans include a planting schedule on drawing L300 and L301.	Appendix J Landscape Plans

3.1.2 Camden Council

Issue	Comment	Response	Reference
Timings	Council thanked the Department for the opportunity to comment. Council requested clarification of the proposed timing of the development in relation to adjoining approved development applications • DA/2018/147/1 (approved the perimeter road to the east), earthworks, including fill over the subject site and the subdivision • DA/2017/491/1 and modifications approved the perimeter road to the south, connection of O'Keefe Drive-North to O'Keefe Drive-South, early works (including fill over the subject site) and subdivision. • It is noted that the drainage of the school site has been catered for in DA/2018/147 with the provision of drainage pipes and the basin has been designed to cater for the school. Council noted there should be a restriction placed that the school cannot be opened until the southern and eastern perimeter roads, connection of O'Keefe Drive-North to O'Keefe Drive South and the drainage/basin system works are complete.	• DA/2017/147/1 was approved on 13 May 2019 for *subdivision to create 10 residential lots and 1 residue lot, construction and dedication of roads and drainage, revegetation and dedication of a drainage reserve, temporary detention / bio-retention basin, bulk earthworks, essential services, landscaping, retaining wall and associated site works (Tranche 33).* A Construction Certificate for Engineering works was issued on 25 July 2019 however no documents from this CC are available on the DA tracker. The road which lies between the subject site and this eastern development is labelled on the plans as Road No. 3301. The approved Civil plans show Road No. 3301 as being constructed under this development. Based on Conditions of Consent, Road No. 3301 must be completed prior to the issue of subdivision certificate for that development, and therefore timing is dependent on the progress of that development and when the developer seeks to obtain the subdivision certificate. In addition, Road No. 610 of the neighbouring DA/2017/491/1 will have to be completed and subdivision certificate issued, prior to the subdivision certificate for DA2017/147/1 being issued. • DA/2017/491/1 was approved on 23 March 2018 for subdivision to create *141 residential lots, 2 superlots, a lot containing Catherine Park House and its improvements, 1 residue lot, 1 public reserve lot, construction of public roads, provision of services, earthworks, site works and retaining walls to be delivered in four stages.* A Construction Certificate for Engineering works was issued on 13 August 2018, however no documents from this CC were available on the DA tracker. The road which lies between the subject site and this southern development is labelled on the plans as Road No. 610. According to Conditions of Consent, the road must be completed prior to the issue of the subdivision certificate for the development (DA/2017/491/1) and therefore the timing is dependent on the progress of that development and when the developer seeks to obtain the subdivision certificate.	
Easement	Council noted the existing temporary onsite detention basin to the north of the site has an easement that encroaches into the proposed site. The temporary basin should be decommissioned, and the easement	Refer to title search which was conducted on 28th September 2019 for the Early Works DA and confirms that the site is not burdened by any easements.	Appendix B – Title Search

Issue	Comment	Response	Reference
	extinguished upon completion of final drainage solution. This should occur prior to the school's construction. Confirmation shall be provided that the easement for overhead powerlines 9 wide through the site has been extinguished. If not, a referral to Endeavour Energy is required by State Environmental Planning Policy (Infrastructure) 2007.		
Northern Public Open Space	Council noted the land to the north of the site will be a public reserve owned by Council. It will be known as 'LS1'. Any co-use proposal would require further detailed discussions with Council. Council recommended the proposed school provide sufficient on-site open space to cater for its own demands without needing to rely upon LS1. This will be provided to meet the recreational needs of the wider Camden community. The proposed school interfaces with LS1, and should be carefully considered. Earthworks as part of the proposed school will result in extensive earthworks, resulting in a swale along the boundary with LS1. Levels of the proposed school should be reviewed and changes are to be made from existing ground level to consider the interface with LS1. Council is currently in the early stages of planning for the embellishment of LS1 and an earlier concept plan is enclosed separately for the Department's information.	Acknowledged. Finished levels have been provided within the SSD with proposed access points to this future use area.	
Interface – South Eastern Corner	Council suggested the proposed school needs to consider its interface with the public domain at the south-eastern corner of the site. This interface is defined by a large batter slope and relatively blank walls on the eastern façade. Council suggested an opportunity to lower the finished floor levels of Block C and D of the proposed school to improve this interface whilst making ramp from Block B	Finished levels have been reviewed and confirmed to align with the adjoining proposed subdivision. The proposed finished levels at the boundary are shown on the Landscape drawings and are coordinated with the proposed levels for the subdivision (DA/2018/147/1) by Greenfield. Civil drawings are showing 1:4 batter as requested by council within review of the Early Works DA/2018/147/1.	

Issue	Comment	Response	Reference
	longer and steeper (whilst maintaining accessibility). Council commented this may assist in reducing the height of buildings.		
Construction - Access	Council did not support the direct access off O'Keefe Drive due to the potential traffic impacts of turning trucks in and out of the site. This is close to residential houses. The temporary access points were suggested to be located on the southern end of O'Keefe Drive. This will ensure protection of the existing kerb and gutter. Council stated in addition to owner's consent for the site, owner's consent must also be provided for the relevant lot if any works or access is proposed on or from adjoining lots (rather than the road reserve).	The most northern entry on the western boundary is positioned mainly for light vehicle access to prevent construction vehicles parking on the street. The southern entry on the western boundary can be used during the works for the majority of heavy vehicles being the point of least impact on local residents.	
Height	Council stated the proposed school is significantly over the height of development standard of 9 metres.	The applicable planning controls for the height of the proposed school are as follows: • SEPP (Sydney Region Growth Centres) 2006 – Appendix 9 Camden Growth Centres Precinct Plan – Clause 4.3 – maximum Height of Buildings that applies to the subject site is 9 metres. • SEPP (Educational Establishments and Child Care Facilities) 2017 – Part 4 Schools – Clause 42 – *Development consent may be granted for development for the purpose of a school that is State significant development even though the development would contravene a development standard imposed by this or any other environmental planning instrument under which the consent is granted.* In accordance with Clause 42 of the Education SEPP, consent may be granted to the SSDA even though it contravenes the building height development standard. This provision provides the consent authority (ie. DPIE) the legal powers to grant consent to the proposed school even if though breaches the height of buildings development standard contained in the Growth Centres SEPP (this is a similar legal authority that Clause 4.6 Variation Requests provide consent authorities to grant consent). It is acknowledged however, that this provision does not imply that the height control and its objectives need not be considered, and as such a comprehensive justification for the proposed school height is provided below.	Shadow Diagrams Appendix Q Response to Harrington Submission Appendix R

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		The maximum height of the proposed school is 14.96 metres as measured the top of the clerestory pop-up windows on Block C. This exceeds the maximum height of 9m for the site. Despite the variation, the proposal is considered to achieve the objectives of the height clause as discussed below. *(a) to establish the maximum height of buildings,* Comment: This objective is achieved as the height control establishes the maximum height of buildings. *(b) to minimise visual impact and protect the amenity of adjoining development and land in terms of solar access to buildings and open space* Comment: The school site is a stand-alone urban block in a low density residential area. Even though it is subject to the low density residential controls being in an R2 zone, the school is a unique development and stand-alone site which would be expected to have a different character, presence and scale to the surrounding area. Accordingly, the height of the school would not appear out of character with the surroundings or have an adverse visual impact on the area. The shadowing impacts on the existing and future dwellings surrounding the site are easily compliant with the CGC DCP control for solar access and the minor impact is limited to a brief period of the year around June 21. *(c) to facilitate higher density development in and around commercial centres and major transport routes* Comment: Not applicable as the site is not located in a commercial centre of or on a major transport route. In addition to achieving the objectives of the height control, there are strong planning merits to justify the height variation as follows:	

Issue	Comment	Response	Reference
		• The shadows of the proposed development will not impact the principal private open space (PPOS) of the future dwellings south of the site and the height variation does not lead to any non-compliance with solar access controls (refer to Appendix R for further details); • The shadows of the proposed development will impact only a small number of lots (approximately 2-3) to the east of the site. This overshadowing will be minimal, only occurring past 2pm at mid winter (June 21), enabling full solar access between 9am and 2pm which complies with the solar access controls within the CGC DCP (refer to shadow diagrams in Appendix Q); • The school site is a stand-alone urban block in a low density residential area. Even though it is subject to the low density residential controls being in an R2 zone, the school is a unique development and stand-alone site which would be expected to have a different character, presence and scale to the surrounding dwellings. Accordingly, the height of the school would not appear out of character with the surrounding area; • The school should act as a landmark site and development for the local area, and to achieve this, urban design principles would suggest that additional height is warranted; • The additional height allows for a three storey school to be provided which results in a smaller building footprint, a more efficient design, more outdoor play space and more landscaped areas. This provides for an improved quality school and better streetscape outcome; • The more compact three storey footprint is essential to achieve the Department of Education's requirements for the area of the outdoor play space and the sports field dimension requirements. Any reduction in the number of storeys would require an expansion of the building footprint, eating into the required outdoor play space and resulting in an undersized sports field. This would result in the school's capacity having to be commensurately reduced which would be to the detriment of the local area and not in the public interest; • The maximum height of 14.96m is measured to the top of the clerestory windows on Block C. These pop-up windows are minor building elements which extend above the main roof line which has a lower height of 13.9 metres. The front roof line of	

Issue	Comment	Response	Reference
		Block A is compliant at 8.08m and Block B is 14.2m. Accordingly, the perceived height of the buildings is closer to 14m rather than 14.96m; • The school buildings are comfortably setback from the boundaries by 6.2m to 9m which creates comfortable separation from the nearest dwellings. The closest dwellings to the non-compliant Block B and C will be the future dwellings opposite the southern road and the eastern road. Assuming those dwellings provide a compliant 4.5m front setback, the separation will be 27.3m to 29.9m; • The building massing is broken down into a series of buildings to create breaks in the built form and a fine grain street pattern. The buildings will be screened by a significant landscaping strip on the southern frontage. The materials and finishes used have been chosen to complement the surroundings. These design measures will serve to visually soften and screen the school, minimising perceived bulk and scale; • The NSW Government Architect provided support to the scale (ie. bulk and height), specifically supporting the following design aspects: 1. *Overall masterplan, clarity of site plan and design principles;* 2. *Civic presence and scale of the buildings;* 3. *Permeability of the school grounds from the street and potential connection to future open space to the north* 4. *Holistic approach to topography, siting of buildings hydrology and vegetation.*	
Waste Pad	Council requested a more detailed plan of the waste pad. The structure is suggested to cast shadows. It was suggested the waste pad is visually prominent due to its location. It was suggested the waste area be relocated to the south eastern corner of the car park.	Car park access has been located in order to not impose traffic issues with the local round-a-bout and proposed bus zone on O'Keefe St. Due to access controls it is to remain in its current location in order to provide an area for queueing to occur off the local road network.	
	The entrance gate for the staff car park was suggested to be moved to a more central location in the car park. Council suggested the gate could be closer to Space 60. This gate was suggested to be directly off the shared space, catering to the required accessible car parking.	The waste pad has currently been positioned in order to provide safe means of access from the utilities provider.	

Issue	Comment	Response	Reference
Post Approval - Conditions of Consent	Council requested the opportunity to provide feedback on potential conditions of consent.	Acknowledged.	
Civil Engineering	Council provided various comments on the engineering. 1. Appendix A, in Key Issues states requirements of what needs to be supplied for Drainage in point 14 on page 6. Information responding to this could not be found. 2. Appendix A, in Plans & Documents, states what is required of the Site Survey Plan (page 7). Appendix C is just a deposited plan. There are no levels or features shown. 3. Appendix B shows the school site fronts three roads, of which only O'Keefe Drive on the western boundary has been built. The road to the south has been DA and CC approved via DA/2017/491 (Catherine Park Estate Stage 6) and the road to the east has been DA approved only via DA/2018/147 (Oran Park Tranche 33). The land to the north is yet to be developed. It is noted that the drainage of the school site has been catered for in DA/2018/147 with the provision of drainage pipes and the basin has been designed to cater the school. There should be restriction placed that the school cannot be opened until both roads and the drainage and basin system is complete. 4. The DCP (Catherine Field Part Precinct) shows a short cul-de-sac road to the north of the site, which may provide alternate access to the school, especially for the proposed carpark and waste and other servicing activities. 5. Appendix T, in section 4.2.4 Stormwater states, 'no formal drainage on site' and 'towards bio-retention basin'. It does not indicate what is proposed or how it will connect to the basin. 6. Appendix X is a simple two paragraph statement stating a 100,000 L rainwater tank will be provided which will irrigate garden and oval. This is considered inadequate. There are no plans showing where the tank will be located (above or below ground), how	1. Refer to Northrop's Stormwater Management Plan within the Civil Drawings. 2. See Survey Plan detailing levels and features. 3. Acknowledged. These are to be delivered by the developers of the neighbouring subdivisions. 4. Acknowledged. 5. Section 4.2.4 of Northrop's Stormwater Management Report relates to the existing scenario and details the proposed stormwater system. 6. The rainwater tank is documented in Northrop's Siteworks and Stormwater Management Plans within the Civil Drawings. 7. It is anticipated that the basin will be built before completion of the school site in conjunction with item 3. 8. Refer to Cut and Fill diagrams prepared for Early Works. 9. Current Stormwater Design Plans have now been provided in Civil Plans.	Appendix A – Civil Drawings Appendix C – Survey Plan Appendix D – Early Works Cut and Fill Plans

Issue	Comment	Response	Reference
	and what stormwater runoff will be collected and drained to the tank. It indicates two inclusions, yet the document only has one page? 7. The comment in Section 3.9 of the EIS is noted about connection to the interim basin of Oran Park Tranche 33. It also claims the basin will be built first. Again, if it is not, then this development will need to provide a temporary OSD/WQ facility. 8. In the EIS, Table 8.0 (page 62) point 4.1.2 claims a cut fill plan is provided in Appendix G – it is not. 9. In the EIS Section 6.8 (page 74) states that Northrop has prepared a Concept Stormwater Design Report. Appendix G is just sediment and Erosion control plans. The statement saying "concluded that the site is not situated on flood prone" is not justifiable based on the documents supplied		
Concept drainage plan	Council requested a concept drainage plan shall be provided for the development. The design shall comply with Council's Engineering Specification. Note the minor system design is a 10% AEP for a school site. A catchment plan shall be included. It shall also access the capacity of the connection point provided by the adjoining DA in the north eastern corner of the development. Should the capacity be inadequate, the design presented must show how this can cater for, by either, upgrading pipes or providing an on-site detention system.	The current Stormwater Design Plans have now been provided within the Civil Plans. Existing Development Applications by neighbouring sites shows that the capacity of the basin has considered the schools catchment.	Appendix A – Civil Drawings
DRAINS model	Council requested a DRAINS model to support the proposed school.	A DRAINS model has now been provided.	Appendix E – DRAINS Model
MUSIC model	Council requested a MUSIC model for the proposed school. Council stated the certification of the model should be provided by using MUSIC-Link.	Refer to Tranche 33 DA (DA/2018/147/1) which has been approved by Council and incorporates the basin design. It has been confirmed with the developers of this site (Greenfields) that the school site has been designed into this basin. This is captured in DA/2018/147/1 Appendix 6 – Stormwater Management Report.	
Site Plan	Council requested a site plan outlining levels and grades across the site. It was noted the entrance driveway and	A site plan detailing levels and grades is included within the Detailed Design Civil Documentation.	Appendix A – Civil Drawings

Issue	Comment	Response	Reference
	access carpark should be included in this site plan. Detail in this site plan should show compliance with AS2890.		
Site Plan	Council requested the site plan be consistent with the EWDA.	The site plan provided within the Detailed Design Civil Documentation is consistent with the Early Works DA.	Appendix A – Civil Drawings
Survey	Council noted the survey should confirm to the SEARS requirements	The Survey Plan attached conforms with SEARS requirement.	Appendix C – Survey Plan
Cut and Fill Plan	Council requested a cut and fill plan for the proposed site as required	The bulk excavation works are being assessed as part of the Early Works DA. The cut and fill plans which are attached to the Early Works DA have been attached for reference.	Appendix D – Early Works Cut and Fill Plans
Flooding	It was noted further justification is required to demonstrate the site is not subject to flooding. Confirmation required that all proposed floor levels are at or above the FPL.	As discussed in the Concept Stormwater Design Report (Appendix G of the EIS), the subject site is not flood affected based on the neighbouring Tranche 33 Stage 1 Stormwater Management Report, Browns Water Cycle Management and Flooding Report and discussions with Camden Council's Engineering Officer.	Appendix F – EIS Concept Stormwater Design Report
Traffic	1. Council requested signage and line marking places to be submitted and Local Traffic Committee concurrence to be sought. 2. It was noted the Traffic Impact Assessment states that the disabled parking will be accommodated within the staff car parking (68 spaces). Accessible spaces will impact the number of spaces provided as shared spaces (as per AS289). It was noted the shared spaces have not been considered as part of the car park layout. The number of accessible spaces provided shall be based on assessment of similar sites. It should be noted special needs stream would need to be provided at the proposed school. 3. Council requested a footpath along the 'future road' on the eastern frontage of the site. This is to consider the gate access no the frontage. 4. Council requested pedestrian crossings and for the locations to be identified. Crossing points should be provided on O'Keefe Drive and crossing points on the southern boundary road. 5. Council requested further information regarding the number of bus bays. The extent of the bus bays should be based no anticipated demand and consider	1. It is anticipated that the requirement to submit signage and line marking places will form a condition of consent. 2. All access, parking and servicing areas have been designed with reference to the appropriate Australian Standards. Specifically, AS 2890.1 (with regard to access driveways and parking modules) and AS 2890.2 (with regard to service vehicles) have been addressed. It is anticipated that a Condition of Consent in any future approval will require that the final design provides full compliance with the Australian Standards, which would provide for any minor design revisions that may arise through to construction commencing. The school does not have a Special Education requirement for the carpark. 3. The Eastern frontage does not currently have a student entry allocated. The gate shown on the drawings is emergency access for an ambulance to the playing field. 4. TfNSW has a reduced warrant for sites used predominately by children and by aged or impaired pedestrians. The criteria to assess whether a pedestrian crossing can be installed is not known for the school when it will be operational. While vehicle volumes can be forecast with relative accuracy and may exceed the requirement, the pedestrian volumes and desire lines may not. This is particularly relevant given that the number of possible directions and access desire lines – depending on specific enrolment locations within the catchment – is likely to significantly	

Issue	Comment	Response	Reference
	similar developments within the LGA such as Gledswood Hills Public School. This school proposes three bus bays. 6. It was acknowledged the Camden DCP requires 66 car parking spaces. It was suggested the provision of 68 car parking spaces of the proposed site will be compromised due to disabled pick-up and drop off areas. Council noted the minimum required number of spaces shall be satisfied. 7. Council noted the distribution of peak hour traffic flow had not been discussed or justified.	spread the concentration of pedestrians and therefore reduce the effectiveness and efficiency of a crossing. Despite this, indicative locations have been provided to demonstrate an appropriate and likely location should the warrants be met once the school is operational. The ultimate crossing location should be based on an assessment of enrolment spatial data with consideration of desire lines. 5. While there is an expectation that the local and district bus services will provide the coverage and capacity required to accommodate student travel to and from the School, dedicated school bus services could be introduced should demand exceed public bus capacity. However, in general students would be encouraged to travel on scheduled public transport routes. O'Keefe Drive has been designated a bus route corridor and as such has been designed in accordance with the appropriate bus standards, including the provision of minimum 3.5m travel lanes and indented bus bays in the vicinity of the site. Bus stopes are expected to be provided approximately every 400m along all bus routes, noting that bus stops are proposed directly adjacent to the School in O'Keefe Drive. The indented bus bay on O'Keefe Drive can accommodate three buses. 6. Kerbside drop off and pick up will be accommodated at the appropriate location in the designated Drop Off Pick Up Zone (DOPUZ) to the south of the site on the Future Road, satisfying the requirement. Accordingly, the spaces will not be required in the car park which is a significant relative distance from the designated buildings. Appropriate signage and provision of a minimum of two car spaces shall be provided in the DOPUZ. 7. The school is centrally located within the Catherine Field (Part) Precinct (CFPP), and many students are expected to live within the CFPP. Consequently, student trips are expected to be distributed to the CFPP road network in accordance with residential densities (across the CFPP). Student vehicle trips are expected to be evenly divided in the School peak periods between inbound and outbound trips. Staff are expected to travel to/from the broader sub-region, with only a minority of trips generated within the CFPP. During the AM school peak period, all staff trips are expected to be arrival trips, while during the PM school peak period all staff trips are expected	

Issue	Comment	Response	Reference
		to be departure trips, though it is noted that the majority of departure trips would be later than the PM school peak period, i.e. coinciding more with the PM commuter peak period.	
Noise and Vibration	1. It was requested trucks collecting waste and garbage should be limited to daytime operation (after 7am). 2. Noise from the proposed school bell and public address system should be controlled to not add to noise from children when they are outdoors. 3. It was noted a significant exceedance of construction noise criteria and temporary acoustic fences of 2.4m high are recommended to mitigate this impact. 4. Council suggested a noise management plan will be required to address noise. Vibration is likely to cause discomfort for the closest residents who may only be 10m away from works during piling operations. A vibration management plan is recommended to address this impact. 5. Vibration is likely to cause discomfort for the closest residents who may only be 10m away from works during piling operations. A vibration management plan is recommended to address this impact.	1. Acknowledged. 2. Bells and PA system will be located and oriented such that they are faced away from residences. 3. A 2.4m barrier is to be installed on O'Keefe Street. 4. The Construction Noise and Vibration Management Plan will be updated and issued prior to construction. The current construction methodology does not require the use of percussive piling and confirmation that the closest resident is approximately 25m from the site boundary and 33m from the closest building lines. 5. See above.	
Public Health	Council noted the proposed development is intended to cater for 1,012 students and associated staffing. It was noted the canteen and out of school hours (OOSH) facility will form part of the proposed school. Council noted these facilities will provide food for sale and will be regulated under the provision of Food Act 2003. OOSH facilities operate separately to the school administration and are considered as stand-alone retail food premises. It was requested both school canteen and OOSH are required to comply with the Australia and New Zealand Food Standards Code and AS 4674-2004 "Design construction and fit-out of food premises".	Acknowledged for Canteen. School requirements do not deem that the OSHC requires to comply with AS 4674 as it is not a commercial food premises.	
Public Health	Council noted there were no detailed plans and specifications for he proposed construction and fit out of the canteen or OOSH. In absence of plans and	Acknowledged.	

Issue	Comment	Response	Reference
	specifications, it is suggested the applicant of the facilities refer to Clause 2.1.3 of AS 4674-2004.		
Building Certification	Council suggested the plans are not detailed enough to complete a BCA capability statement and access report to demonstrate compliance with the BCA without the need for significant alterations Council noted an automatic fire suppression system and fire hydrant system as well as a sub-station. This will likely require the provision of a sprinkler and hydrant pump room. These key pieces of infrastructure should be shown to understand their location and any impacts upon the external appearance of the development. Council recommended the site plans be updated to detail accessible car parking spaces that comply with Part D3 of the BCA and AS2890 to ensure that at least the minimum required car parking spaces are provided.	Refer to Architectural drawings NHQC2-CF-AR-SSDA-00_002 noting external site services forming part of this assessment. Refer to Architectural Drawings which have been updated to show compliance with accessible car parking spaces.	Appendix G – Architectural Plans
Landscaping	Council noted it is critical for the Eucalyptus species stock to be checked for any defects or poor branch formation. Such stock must be rejected to avoid future risk. This can be addressed via a condition of consent.	Acknowledged, it is anticipated that this will be designated as a Condition of Consent.	

3.1.3 Endeavour Energy

Endeavour Energy has provided recommended conditions of consent. SINSW supports the conditions of consent and raise no objection on this matter.

Issue	Comment	Response	Reference
Easements	Endeavour Energy referred to the relevant description and SSDA in their submission. It was acknowledged there are no easements over the site benefitting Endeavour Energy (active easements). However, it was noted there is a released easement for overhead power lines in a 'Retired Property'. An easement adjoining the southern boundary of the site for 11,000 volt/ 11 kilovolt (kV) high voltage underground	Acknowledged.	

Issue	Comment	Response	Reference
	cables and underground earth cables is in the 'Future Road'. Low voltage and 11kV high voltage underground cables to parts of the O'Keefe Drive road verge and roadway. Based on Endeavour Energy's review, there is no electricity infrastructure belonging to other authorities or customers beyond their point of supply to their properties. It was noted that the plan is not a 'Dial before you dig' plan under the provisions of Part 5E 'Protection of underground electricity power lines' of the Electricity Supply Act 1995 (NSW). Subject to recommendations and comments, Endeavour Energy has no objection to the SSDA.		
Network Capacity/Connection	As shown in the following extract of the Proposed Architectural Plans provision has been made for a padmount station on O'Keeve Drive frontage. A site plan was supplied by Endeavour Energy G/Net master facility model, which outlines applications for proposed contestable work projects with Endeavour Energy's Network Connections Branch. This is for electricity supply to the development for urban residential subdivision. As such, Endeavour Energy's Network Connections Branch are managing the conditions of supply with the proponent and their Accredited Service Provider (ASP). The site plans do not have specific 'Work polygon's for the proposed school, therefore contact will need to be made with Endeavour Energy's Network Connections Branch if the proposed development includes:	Acknowledged.	

Issue	Comment	Response	Reference
	• Any contestable works projects that are outside of the existing approved/certified works • Results in an electricity load that is outside of the existing supply/connection offers requiring the incorporation of additional load. This is due to load being based on a desktop assessment using the After Diversity Maximum Demand (ADMD). This is where demand is formed through several customers. Depending on the proposed school, the ADMB may not be enough.		
• Future roads	Endeavour Energy has not undertaken a detailed analysis of the SSDA. However they have provided the following advice: • Asset Strategy & Planning Branch has just completed an application for connection of load application which has been returned to Network Connections Branch for referral to the customer / applicant. • It is Asset Strategy & Planning Branch's understanding that the future roads were surveyed and Endeavour Energy's existing underground cables in the easement are in the electrical allocation for the future roads. Once the future roads have been built and declared as public roads, the easements should be able to be relinquished. • Network Connections Branch will make the applicant's Accredited Service Provider aware of the conditions for the release of easement. • If the design of the roads changes such that the existing underground cables will need to be moved, the developer/s will use the standard customer application process for the asset relocation project	Acknowledged.	

Issue	Comment	Response	Reference
	As indicated in the Infrastructure Management Plan, a pad mount substation will be required to facilitate the construction of the new school. There are currently no 11 kV high voltage underground feeders in the locality of the pad mount substation shown in the Proposed Architectural Plans and these would need to be extended to the proposed substation site to provide supply.		
Padmount substation	Endeavour Energy suggested the provision of a substation is positive. The general requirements for a pad mount station is to be at ground level, with direct access from a public street (unless provided with a suitable easement). It must be protected by an easement and associated restrictions. This easement is to be gifted to Endeavour Energy, as outlined in the Endeavour Energy Mains Design Instruction MDI 0044 'Easements and Property Tenure Rights'. The pad mount station easement is to have a minimum of 2.75metres x 5.5 metres and must also have additional restrictions for fire rating. This usually extends 3 metres horizontally from the base of the substation footing, and 6 metres vertically from the same point, also regard to any structures. Requirements are shown in the Endeavour Energy's Main Design Instruction MDI 0044 'Easements and Property Tenure Rights'.	Acknowledged. A condition of approval will be included covering requirements for the pad mount station and associated easements and restrictions.	
Pad mount substation	Endeavour Energy supplied extracts from the Main Construction Instruction MCI1006 'Underground distribution: Construction standards manual' which explains the fire restriction and MDI0028 'Underground distribution network design' for pad mount substations. The Australian Standard AS2067: 2016 'Substation and high voltage' was also referred to.	Acknowledged.	
Padmount substation	It was acknowledged a Level 3 Accredited Service Provider (ASP), is engaged by the developer to ensure the substation location and design complies with Endeavour Energy's standards, suitability of access, safety clearances, fire ratings, flooding etc. As a condition of the SSDA, the Department should request the submission of documentary evidence from Endeavour Energy confirming that satisfactory	Acknowledged. A condition of approval will be included to ensure that a Level 3 ASP is engaged.	

Issue	Comment	Response	Reference
	arrangements have been made for the connection of electricity and design requirements of the substation, prior to the release of the Construction Certificate/commencement of works.		
Urban design network	Endeavour Energy requires urban network design to adhere to relevant requirements outlined in Section 9.2.5 of the 'Network Asset Design.'	Acknowledged.	
Bushfire	Endeavour Energy acknowledged the EIS indicated the site is located on the vegetation buffer zone of bushfire prone land. The Bushfire Assessment had provided an assessment of the site, having regards to NSW Rural Fire Service 'Planning for Bushfire Protection 2006'. This report suggested the electricity supply to the site is underground and complies with this guideline. Endeavour Energy refers to relevant requirements outlined in Section 9.1.1 Bushfire Risk Management. Accordingly the network required to service the proposed development must be fit for purpose and meet the technical specifications, design, construction and commissioning standards based on Endeavour Energy's risk assessment associated with the implementation and use of the network connection / infrastructure for a bushfire prone site. In assessing bushfire risk, Endeavour Energy has traditionally focused on the likelihood of its network. starting a bushfire, which is a function of the condition of the network. Risk control has focused on reducing the likelihood of fire ignition by implementing good design and maintenance practices. However, the potential impact of a bushfire on its electricity infrastructure and the safety risks associated with the loss of electricity supply are also considered.	Acknowledged. A condition of approval will be included to ensure that the network servicing the development will meet Endeavour Energy's standards relating to bushfire prone sites.	
Easement Management/Network Access	Endeavour Energy provided a summary of usual/main terms regarding electrical easement requirements. This included:	Acknowledged.	

Issue	Comment	Response	Reference
	• Not install or permit to be installed any services or structures within the easement site. • Not alter the surface level of the easement site. Not do or permit to be done anything that restricts access to the easement site without the prior written permission of Endeavour Energy and in accordance with such conditions as Endeavour Energy may reasonably impose.		
Easement Management/Network Access	It was acknowledged Endeavour Energy's preference is for no activities or encroachments to occur within its easement areas. However, if any proposed works (other than those approved / certified by Endeavour Energy's Network Connections Branch as part of an enquiry / application for load or asset relocation project) will encroach/affect Endeavour Energy's easements, contact must first be made with the Endeavour Energy's Easements Officer, Philip Wilson, on direct telephone 9853 7110 or alternately by email Philip.Wilson@endeavourenergy.com.au or Easements@endeavourenergy.com.au . For further information, please also find attached a copy of Endeavour Energy's Mains Design Instruction MDI 0044 'Easements and Property Tenure Rights' which deals with activities / encroachments within easement areas.	Acknowledged.	
Easement Management/Network Access	Endeavour Energy supplied a reference of 'Guide to Fencing, Retaining Walls and Maintenance Around Padmount Substations' for the Padmount Station on the site. The importance of access to the existing electrical infrastructure on and in proximity of the site be maintained at all times was acknowledged. To ensure that supply electricity is available to the community, access to the electricity infrastructure may be required at any time. Restricted access to electricity infrastructure by maintenance workers causes delays in power restoration and may	Acknowledged.	

Issue	Comment	Response	Reference
	have severe consequences in the event of an emergency.		
Earthing	It was acknowledged the construction of the proposed school, whether temporary or permanent, that is connected to, or in close proximity to Endeavour Energy's electrical network is required to comply with Australian/New Zealand Standard AS/NZS 3000:2018 'Electrical installations' as updated from time to time. This Standard sets out requirements for the design, construction and verification of electrical installations, including ensuring there is adequate connection to the earth. Inadequate connection to the earth to allow a leaking/fault current to flow into the grounding system and be properly dissipated places persons, equipment connected to the network and the electricity network itself at risk from electric shock, fire and physical injury. Under Endeavour Energy's 'Design certification checklist for ASP L3' the design of the pad mount substation must comply with Endeavour Energy's 'Earthing Design Instruction EDI 001 – Earthing design risk assessment' in which schools are regarded as a 'special location' – please see the following extract of EDI 001. As the proposed school will require a pad mount substation, the applicant should check with their ASP who responsible for the network connection to the site that any pad mount substation earthing has been designed to comply with the 'special location' requirements under EDI 100.	Acknowledged. A condition of approval will be included to ensure that development complies with Australian/New Zealand Standard AS/NZS 3000:2018 'Electrical installations.	
Prudent Avoidance	It was acknowledged the electricity industry has adopted a policy of prudent avoidance by doing what can be done without undue inconvenience and at modest expense to avert the possible risk to health from exposure to emissions form electricity infrastructure such as electric and magnetic fields (EMF) and noise which generally increase the higher the voltage ie. Endeavour Energy's network ranges from low voltage (normally not exceeding 1,000 volts) to high voltage (normally exceeding 1,000 volts but not exceeding 132,000 volts / 132 kV). In practical terms this means that when designing new transmission and distribution facilities, consideration is given to reducing exposure and increasing separation	Acknowledged.	

Issue	Comment	Response	Reference
	distances to more sensitive uses such as residential or schools, pre-schools, day care centres or where potentially a greater number of people are regularly exposed for extended periods of time. These emissions are usually not an issue but with Council's permitting or encouraging development with higher density, reduced setbacks and increased building heights, but as the electricity network operates 24/7/365 (all day, every day of the year), the level of exposure can increase. Endeavour Energy believes that irrespective of the zoning or land use, applicants (and the Department) should also adopt a policy of prudent avoidance by the siting of more sensitive uses eg. the office component of an industrial building, away from and less susceptible uses such as garages, non-habitable or rooms not regularly occupied eg. storage areas in a commercial building, towards any electricity infrastructure – including any possible future electricity infrastructure required to facilitate the proposed development. Where development is proposed in the vicinity of electricity infrastructure, Endeavour Energy is not responsible for any amelioration measures for such emissions that may impact on the nearby proposed development. • Endeavour Energy supplied 'Energy Networks Association's 'Electric & Magnetic Fields – What We Know'' which can also be accessed via their website at https://www.energynetworks.com.au/electric-and-magneticfields and provides the following advice: • Electric fields are strongest closest to their source, and their strength diminishes rapidly as we move away from the source. • The level of a magnetic field depends on the amount of the current (measured in amps), and decreases rapidly once we move away from the source.		

Issue	Comment	Response	Reference
	• Typical magnetic field measurements associated with Endeavour Energy's activities and assets given the required easement widths, safety clearances etc. and having a maximum voltage of 132,000 volt / 132 kV, will with the observance of these separation distances not exceed the recommended magnetic field public exposure limits. • Endeavour Energy's Network Environment Assessment Section has provided the following general advice in regard to schools, pre-schools, day care centres which are regarded as a 'sensitive use' being in proximity of electricity infrastructure: • As far as Endeavour Energy know there are no restrictions in legislation that stop schools, pre-schools, day care centres being placed next to electricity infrastructure. • Prudent avoidance measures must however be implemented. Prudent avoidance was a policy recommended by former Chief Justice of the High Court of Australia, Sir Harry Gibbs, as a result of an inquiry he conducted into community needs and high voltage transmission lines including issues in relation to EMF back in 1991. The findings in the Gibbs report are consistent with subsequent inquiries and are still relevant today. • Prudent avoidance is defined as doing what can be done without undue inconvenience and at modest expense to avert the possible risk to health from exposure to new high voltage transmission facilities. In practical terms, this means designing new transmission and distribution facilities having regard to their		

Issue	Comment	Response	Reference
	capacity to produce EMFs, and siting them having regard to the proximity of houses, schools and the like. • Although the Gibbs report was particularly aimed at electricity distributers to consider when placing their infrastructure, and bearing in mind that there are schools, pre-schools, day care centres adjacent to our infrastructure in various locations right across our franchise area, it is nonetheless Endeavour Energy's recommendation it that such 'sensitive uses' not be built adjacent to major electricity infrastructure. • Should such a development proceed, the design of the schools, pre-schools, day care centres should also consider prudent avoidance measures such as any rooms which the children will occupy (class rooms, play areas, sleeping rooms, eating areas) be arranged such that they are on the side of the site/building which is furthest away from the electricity infrastructure. There is scientific consensus that health effects have not been established but that the possibility cannot be ruled out. Accordingly, if there are any concerns regarding the location of the schools, pre-schools, day care centres in proximity to the electricity infrastructure, in order to make an informed conclusion, the applicant may need to commission an independent review to provide an overall assessment including electric and magnetic field measurement and advice. Applying a precautionary approach early on in the design process will hopefully result in the adoption of prudent avoidance principles benefitting the eventual development of the site.		
Vegetation Management	Endeavour Energy stated the planting of large trees near electricity infrastructure was not supported. Suitable planting will need to be undertaken in proximity of	Acknowledged.	

Issue	Comment	Response	Reference
	electricity infrastructure (including new electricity infrastructure required to facilitate the proposed development). Larger trees should be planted well away from this infrastructure, and root barriers around the root ball of the plant are to be installed. This recommendation also relates to underground cables. Endeavour Energy explained the interference could be a potential safety risk, restrict access, reduce light levels from street lights or result in an interruption of supply. Works may be subject to Endeavour Energy's Vegetation Management program and/or the provisions of the Electricity Supply Act 1995 (NSW) Section 48 'Interference with electricity works by trees' by which under certain circumstances the cost of carrying out works may be recovered. The padmount station that facilitates the proposed school should refer to the Endeavour Energy 'Guide to Fencing, Retaining Walls and Maintenance around Padmount Stations.'		
Dial Before You Dig	Endeavour Energy noted 'Dial before you Dig' must be undertaken before commencing underground activity. Advice should be obtained in accordance with the requirements of the Electricity Supply Act 1995 and associated Regulations. This should be obtained by the applicant not only to identify the location of any underground electrical and other utility infrastructure across the site, but also to identify them as a hazard and to properly assess the risk.	Acknowledged. A condition of approval will be included to ensure that 'Dial before you Dig' is undertaken prior to the commencement of any underground activity.	
Public Safety	Endeavour Energy acknowledged construction near the electricity infrastructure may run of workers receiving electric shocks causing substantial damage to the plant and equipment. A public safety training resource was supplied, to assist the general public and workers to understand the risks and how to undertake work safely. The public safety training resource is available online, and a link was supplied. If there are any concerns regarding the proposed works in proximity of Endeavour Energy's electricity	Acknowledged.	

Issue	Comment	Response	Reference
	infrastructure to the road verge/roadway, an email account has been provided to ensure there is an effective line of communication with the general public (Construction.Works@endeavourenergy.com.au)		
Emergency Contact	Endeavour Energy supplied the emergency contact relating to the electrical network. Endeavour Energy's contact details should be included in the Risk & Safety Management Plan. It was acknowledged not all the foregoing issues may be relevant or significant to the SSDA. It was the preference to alert proponents of the potential matters that may arise should works be within closer proximity of the existing and/or required electricity infrastructure needed to facilitate the proposed development on or near the site occur.	Acknowledged.	

3.1.4 Water NSW

Issue	Comment	Response	Reference
Water infrastructure	It acknowledged the location of the site to land, assets and infrastructure (over 2.7km from critical water supply infrastructure, the Upper Canal), means there are no particular comments or requirements from Water NSW.	Noted. No further action.	

3.1.5 Transport for NSW

Issue	Comment	Response	Reference
	It was noted the Transport Impact Assessment (TIA) had been reviewed by TfNSW. Various comments are outlined regarding the following: • Details to be provided of the future Road 610 and 3301 including design, responsible delivery party, expected	Acknowledged and discussed below.	

Issue	Comment	Response	Reference
	completion date and interim accessibility measures (if required) • Advice that the proposed drop off and pick up (DOPU) facilities on O'Keefe Drive should give consideration to the function and characteristic of O'Keefe Drive as identified in the DCP of Catherine Fields (Part) precinct Suggested draft conditions were also supplied.		
Future Roads 610 and 3301	It is recommended that, as stipulated in the SEARS, details of the future Road 610 and 3301 including design, responsible delivery part(ies), expected completion date and interim accessibility measures (if required) should be provided. It is noted that as the current proposal provides transport facilities, i.e. DOPU and pedestrian entries that are essential to serve the school site on these two future roads, it is necessary to provide this information in support of the proposal.	Roads 610 and 3301 are not part of the projects approval request and are being provided by the local developers Greenfield and Harrington's respectively. Ongoing discussions are yet to be resolved with the developers of the neighbouring sites regarding the timing of the roads. Further information will be provided to DPIE once this issue has been resolved. A copy of the approved plans for the southern road No. 610 is held in Appendix S.	Appendix S Approved Southern Road Plans
Proposed transport facilities on O'Keefe Road	It is noted that O'Keefe Drive is identified as a major collector road within the precinct with proposed regional or district bus routes. It is noted that the current proposal indicates several facilities to be provided at the school frontage on O'Keefe Drive such as car park access, DOPU and school bus bays. The following recommendations are provided in giving further consideration to the functionality of O'Keefe Drive: • School car park access is going through the indented parking lane. Clarification should be provided on how this access will be managed in relation to the parking lane which has already been built on site. • Impact of DOPU activities during school peak hours occurring on key collector road with (future) regular bus services operating on it. • Pedestrian connectivity in relation to accessing (future) bus stops on both sides of O'Keefe Drive, having regard to the school traffic and DOPU activities during school peak hours should be reviewed in respect to road safety.	The western side of O'Keefe Drive has existing residential housing with off street parking in accordance with the DCP as well as supplementary on street parking. Therefore, it is unreasonable to provide both sides of the road to accommodate their parking requirements. It is assumed that the eastern side of O'Keefe Drive would accommodate the needs of the site on that side. Accordingly – since O'Keefe Drive has been designated as a bus route corridor and as such has been designed in accordance with the appropriate bus standards, including the provision of 3.5m travel lanes and indented bus bays – the indented bus bay on O'Keefe Drive is being provided to accommodate three buses. In accordance with Section 3 of AS 2890.1, the access to the proposed off-street car park on O'Keefe Drive has been formed in such a way to be clearly recognised by road users as an access driveway. Additionally, the appearance and character of the driveway is such that it will be clear to vehicle drivers that pedestrians and frontage road traffic have priority of movement. The Category 2 access is not located in a prohibited location in accordance with AS2890.1 and has satisfactory entering sight	

Issue	Comment	Response	Reference
		distance and clear sight lines for pedestrians for the design speed.	
Drop Off/Pick Up (DOPU) demand	It was suggested in the TIA, the proposed DOPU zone will be managed and time restricted to maximum 2 minutes. The report also acknowledges that a longer average standing time is required in the PM school peak as parents/carers would normally arrive prior to the end of school to wait for the students. It is evident that the analysis of DOPU movements is based on a 2-minute usage time over a 45 minute period without considering the demand of parents/carers waiting prior to end of school. It is also commonly observed at primary schools that some short-term parking demand would be generated by parents/carers of younger students who would stay till start of school in the AM school peak. It was recommended further analysis should be provided in assessing the drop-off/pick-up demand, including short-term parking demand, around the school site and identify practical measures to alleviate the impact if necessary.	The provision of DOPU spaces in Road 610 could provide the capacity required to accommodate peak demand, with an estimated peak queue of 33 vehicles, or a length of approximately 200m. This queue could be accommodated in Road 610 adjacent to the School, feeding DOPU spaces in the southern end of O'Keefe Drive adjacent to the School. The PM pick-up period is spread more than the AM due to staggered finish times, generates less traffic due to after hours school care and co-curricular activities, and does not align with the network peak. Therefore, queueing in the PM will be less than the AM. Dwell times in the DOPU zones are subject to the Australian Road Rules no standing parking rule. Under the no parking rule, motorists cannot stop for longer than two minutes and cannot move more than three metres from their vehicle. These times have been used in calculating the requirements for the DOPU zone. The timing will be managed in the school's Traffic and Pedestrian Management Plan and enforced the same as all existing kerbside parking restrictions.	
Transport Operation	The following text from the TIA is quoted "This queue could be accommodated in Road 610 Street adjacent to the School, feeding DOPU spaces in the southern end of O'Keefe Drive adjacent to the school". It is noted that this implies that DOPU traffic would first arrive on Road 610 for queuing and once school ends, make a U-turn on Road 610 and right turning onto O'Keefe Drive, U-turn at the roundabout on Benfield Drive to access the DOPU on the southbound of O'Keefe. It is recommended that further consideration should be provided to the practicality of such operations which would create significant circulation traffic. It is recommended that if the proposed operation is in place, clarification is needed on whether the traffic impact has taken into account this circulation traffic at the two assessed intersections. It is noted that O'Keefe Drive will have regular bus service operation (including bus stops) and it is identified as a key collector road	Student DOPU trios are expected to be concentrated over 30-45 minutes rather than a full hour in each of the School peak periods. Schools are required to use DOPU areas under the same conditions as No Parking zones, i.e. a maximum stay of 2 minutes, remaining in or within 3 metres of the vehicle. As such, an individual DOPU space could effectively serve approximately 15-20 vehicles across a 30-45 minute period. Further, the different characteristics of the drop-off trip against the pick-up trip have also been considered in the modelling. Regarding bus movements, it has been advised that service operation details and bus stop locations have not been finalised for the route. Therefore, conservative assumptions have been made for the analysis with consideration of buses and heavy vehicles.	

Issue	Comment	Response	Reference
	in the Catherine Fields (Part) Precinct ILP and DCP, which needs to be considered.	It is expected that the NSW Department of Education (DoE) will consult with Council and TfNSW in regard to appropriate sign-posting of set down and bus zones adjacent to the Site and that prior to opening, the DoE and the School will prepare a Traffic and Parking Plan (TPMP) to outline the strategies proposed to provide for safe and efficient operations on and off-site. The TPMP is expected to include operational strategies in relation to: • The use of the staff car park; • The use of the DOPU areas, including information in regard to length of stay and (for example) children's names on visors and staggered start and finish times to maximise the safety and efficiency of the DOPU areas; • Bus loading and unloading; and • Safe Routes to Schools measures, such as safe walking and cycle routes between the School and the surrounding residential areas.	
Traffic Impact Assessment	It is noted that in Section 6.1.2 of the TIA that only future intersection performance is shown. It is recommended that a comparison of pre-development and post-development of intersection performance should be included in the TIA to determine the impacts of the proposed development on the surrounding road network.	The proposed local road network in the vicinity of the school is not complete. However, the SIDRA table within the Traffic Response (Table 1: 2036 Intersection Operations within Technical Note Reference P1047t03v01) provides a summary of the future performance of the key intersections further to the SIDRA analysis. With reference to the table, the only existing intersection is O'Keefe Drive/Banfield Drive which is forecast to operate at good levels of service during the school peak periods. Therefore – based on observations on site – it is reasonable to assume that the current operation is also a good level of service.	Appendix H – Traffic Response
Construction Traffic Impact	The Construction Traffic Management Plan (CTMP) was reviewed. Details in relation to swept path of the largest vehicles entering and exiting the site (in a forward direction) should be included. It was recommended a swept path analysis detailing the above comment should be included in the RtS.	Refer to Swept Path Analysis within Appendix A of Ason Group's Response to Submissions (held in Appendix H of this report)	Appendix H – Traffic Response
Green Travel Plan	A framework Green Travel Plan (GTP) was reviewed.	The provision of a Transport Access Guide will be included as a condition of consent and developed once the required data is available.	

Issue	Comment	Response	Reference
	• It was noted a Transport Access Guide should be provided. It should be a guide applicable to staff, students and parent/carers about the range of travel modes, access arrangements and supporting facilities that service the site. This will: • identify which party is responsible for the delivery of each action in the GTP and advise when each action will be delivered; • analyse the likely travel origins and modes of travel based on the school catchment and aggregate residential post code analysis of enrolled students, once known; • identify when to communicate with TfNSW about any proposed transport service improvements in the area and/or the need for any additional services that may be required, based on the projected demand identified above. It was recommended this was provided prior to the issue of an Occupation Certificate. A comprehensive Travel Plan (or amend and expand the existing framework GTP) in consultation with TfNSW should be developed to address the above.		
School signs and associated markings	It was noted written authorisation from Transport for NSW (TfNSW) must be obtained to install School Zone signs and associated pavement markings, and/or remove/relocate any existing Speed Limit signs. To obtain authorisation, the applicant must submit the following for review and approval by TfNSW, at least eight (8) weeks prior to student occupation of the site: a. A copy of development Conditions of Consent b. The proposed school commencement/opening date c. Two (2) sets of detailed design plans showing the following: i. School property boundaries ii. All adjacent road carriageways to the school property iii. All proposed school access points to the public road network and any conditions imposed/proposed on their use iv. All existing and proposed pedestrian crossing facilities on the adjacent road network	Acknowledged. The post determination process for the installation of School Zone signs and associated pavement markings will be included as a condition of consent.	

Issue	Comment	Response	Reference
	v. All existing and proposed traffic control devices and pavement markings on the adjacent road network (including School Zone signs and pavement markings). vi. All existing and proposed street furniture and street trees.		
Car Parking	It was noted that the layout of the proposed car parking areas associated with the development (including driveways, grades, turn paths, sight distance requirements in relation to landscaping and/or fencing, aisle widths, aisle lengths, and parking bay dimensions) should be in accordance with AS 2890.1- 2004, AS2890.6-2009 and AS 2890.2 – 2002 for heavy vehicle usage.	All access, parking and servicing areas have been designed with reference to the appropriate Australian Standards, specifically AS 2890.1 and AS 2890.6 (with regard to access driveways and parking modules) and AS 2890.2 (with regard to service vehicles). It is expected that a Condition of Consent in any future approval will require that the final design provide full compliance with Australian Standards, which would provide for any minor design revisions that may arise through to construction commencing. The swept path analysis completed by ASON Group is held within Appendix A of the Traffic Response (held in Appendix H of this report)	Appendix H – Traffic Response
Construction Traffic Management Plan	It was noted A Construction Traffic Management Plan (CTMP) detailing construction vehicle routes, number of trucks, hours of operation, access arrangements and traffic control should be submitted to the relevant consent authority for approval prior to the issue of a Construction Certificate. Swept path of the longest vehicle (including garbage trucks, building maintenance vehicles and removalists) entering and exiting the subject site, as well as manoeuvrability through the site, shall be in accordance with AUSTROADS. In this regard, a plan shall be submitted to Council for approval, which shows that the proposed development complies with this requirement.	A detailed Construction Traffic Management Plan detailing construction vehicle routes, number of trucks, hours of operation, access arrangements and traffic control will be submitted to the relevant consent authority for approval prior to the issue of a Construction Certificate. It is acknowledged that this would be included as a Condition of Consent.	

3.1.6 Environmental Protection Authority (EPA)

Issue	Comment	Response	Reference
Construction activities	The EPA stated all construction and construction related activities should be undertaken in an environmentally responsible manner with an emphasis on: • contaminated land management, • compliance with recommended standard construction hours, • intra date respite periods, • feasible and reasonable noise vibration and mitigation; • waste handling and management; • effective dust control and management; and • erosion and sediment control.	Acknowledged.	
Contaminated Land Management	The EIS Appendix Q Stage 2 Environmental Assessment was reviewed. This indicated the areas of concern at the side include fill material, historical agricultural use and dryland salinity. Monitoring results for soil and groundwater generally indicated level below the site acceptance criteria, except for some metals that exceeded the groundwater criteria. It was acknowledged this report also identified saline conditions at the site that warrant management. Landscaped areas and built structures exposed to soil and groundwater should be designed to withstand aggressive and saline conditions. The potential remains for isolated pockets of contamination issues encountered during development works. It was recommended the preparation and implementation of an unexpected find protocol (UFP) be developed during the development of this site. It is recommended notification is required to the EPA (under Section 60 of the CLM Act) should any contamination of the development site be identified which meets the triggers in the NSW EPA (2015) Guidelines for the Duty to Report Contamination.	Noted. SINSW anticipates an Unexpected Finds Protocol will form a condition of approval, in accordance with the Department's standard conditions.	

Issue	Comment	Response	Reference
Contaminated Land Management	It was noted processes outlined the processes in State Environmental Planning Policy 55 – Remediation of Land (SEPP 55) be followed in order to assess the suitability of the land and any remediation required in relation to the proposed use. The proponent is required to ensure the proposed development does not result in a change of risk in relation to any pre-existing contamination on the site to result in significant contamination. This would render the proponent the 'person responsible' for the contamination under Section 6(2) of the Contaminated Land Management Act 1997 (CLM Act).	Noted. As outlined in the Stage 2 Environmental Site Assessment completed for the EIS, there were 'no identified source' of contamination and therefore no complete source-pathway receptor (SPR) linkage. In the case there are finds of contamination on site, an Unexpected Finds Protocol will be developed in preparation. SINSW anticipates an Unexpected Finds Protocol will form a condition of approval, in accordance with the Department's standard conditions.	Appendix I – EIS Stage 2 Environmental Site Assessment
Noise and Vibration	It was noted bulk earthworks, construction and construction related activities have the potential to cause noise and vibration impacts on adjoining and surrounding residences. It was recommended standard construction hours and intra-day respite periods are scheduled. It was recommended site preparation, bulk earthworks, construction and construction related activities should be undertaken during the recommended standard hours of construction. Reference to EPA (2009) Interim Construction Noise Guideline (ICNG) identifies the best practicable measures in respect to recommended standard hours of construction (in the absence of strong justification for alternative hours. It was recommended the construction activities associated with the project must only be undertaken during 9am-6pm Monday to Friday inclusive, 8am-1pm Saturdays and no work on Sundays or gazetted public holidays.	The construction methodology considers construction related activity outside of the EPA recommended construction hours. This is to consider deliveries of heavy machinery and materials to conform to the overriding requirements of the Roads and Maritime Services (RMS). No construction will occur between 7-8am and 1-3pm on Saturdays. The proposed construction hours for the development are: • Monday to Friday 7am-6pm • Saturday 7am-3pm. • No work is proposed in Sundays and Public Holidays. SINSW anticipates these construction hours will form a condition of approval, in accordance with the Department's standard conditions.	
Noise and Vibration	It was acknowledged the site preparation, bulk earthworks, construction and construction-related activities generating noise with particularly annoying or intrusive characteristics should be subject to a regime of intra-day respite periods. These works were recommended to be only undertaken after 9am, and undertaken over continuous periods not exceeding 3 hours. 'Continuous' means any period during which there is	A regime of intra-day respite periods will be considered as part of the Construction Management Plan to consider the surrounding development.	

Issue	Comment	Response	Reference
	less than an uninterrupted 60 minute respite between temporarily halting and recommencing any of the intrusive and annoying work referred to in Section 4.5 of the ICNG.		
Noise and Vibration	It was noted that intra-day respite periods are not proposed to apply to demolition, site preparation, bulk earthworks, construction and construction-related activities that do not generate annoying and intrusive noise. It was noted the proponent is required to: a) ensure construction vehicles (including concrete agitator trucks) involved in demolition, site preparation, bulk earthworks, construction and construction-related activities do not arrive at the project site or in surrounding residential precincts outside approved construction hours. b) where feasible, ensure construction vehicles turn off their engines during idling to reduce noise impacts. c) comply with quiet work practices to minimise noise including those described in ARSB (Appendix M) section 10.2. The proponent be required to consider undertaking a safety risk assessment of site preparation, bulk earth works, construction and construction-related activities to determine whether it is practicable to use audible movement alarms of a type that would minimise the noise impact on surrounding noise sensitive receivers, without compromising safety.	Acknowledged. A 2.4 metre solid acoustic barrier will be installed along O'Keefe Drive to mitigate noise impacts to the neighbouring residents. A Safety Risk Assessment of site preparation, earthworks, construction and construction related activities will be developed as part of the Construction Management Plan to consider movement alarms that are sensitive to the surrounding development.	
Waste Management	• It was noted waste should be managed in accordance with the Waste Management Hierarchy. This is established under the Waste Avoidance and Resource Recovery Act 2001, and ensures that resource management options are considered against the following priorities: • Avoidance including action to reduce the amount of waste generated by households, industry and all levels of government • Resource recovery including reuse, recycling, reprocessing and energy recovery, consistent with the most efficient use of the recovered resources • Disposal including management of all disposal options in the most environmentally responsible manner.	A Waste Management Plan will be updated for the school, considering the Better Place Guidelines for Waste Management and Recycling in Commercial and Industrial Facilities (2012) and SINSW. This will form a condition of approval, in accordance with the Department's standard conditions. A Construction Management Plan has been developed and considers dust control and management. It is acknowledged this is an important air quality issue during site preparation. SINSW anticipates this will form a condition of approval.	

Issue	Comment	Response	Reference
Erosion and sediment control	It was acknowledged erosion and sediment control should refer to the Managing Urban Stormwater Soils and Construction, 4th Edition from Landcom (Blue Book). Feasible and reasonable measures should be undertaken to prevent water pollution in the course of developing the site. Site preparation, bulk earthworks, construction and construction-related activities should not commence until appropriate and effective sediment controls are in place. Daily inspection of sediment controls should be undertaken to ensure timely maintenance and repair of those controls. It was recommended to design and implement erosion and sediment control to comply with Landcom's Managing Urban Stormwater Soils and Construction, 4th Edition.	The Sediment and Erosion Control Plan has considered the Landcom's Managing Urban Stormwater Soils and Construction, 4th Edition.	Appendix A – Civil Plans
Operational Phase	It was acknowledged that during the operational phase, environmental impacts that arise should be largely averted by responsible environmental management practices. The EPA does not review or endorse environmental management plans or similar. The EPA encourages the development of such programs to ensure proponents demonstrate how they will meet their statutory obligations and designated environmental objectives. Their role is to set the environmental objectives for environmental management, not be directly involved in the development of strategies to achieve those objectives. As such, the EPA has not reviewed any environmental management plan forming part of or referred to in the EIS.	Acknowledged.	
Noise and Vibration impacts	It was noted the proposed school (especially out of hours use of school facilities by external parties) could have the potential for significant operational noise impacts on nearby sensitive receivers, unless carefully considered. There are surrounding residences in the proximity of the school and the EPA is aware from previous experience of the need for appropriate operational noise mitigation and management measures, particularly regarding: a) the nature of and times during which school facilities are made available for community use;	An Operational Noise Management Plan will be prepared for the proposed school and SINSW anticipate this will form a condition of approval.	

Issue	Comment	Response	Reference
	b) design, selection and operation of mechanical ventilation plant and equipment; c) the design and operation of the school public address/bell system; d) the design and location of waste storage facilities; e) time restrictions on waste collection services; and f) time restrictions on grounds maintenance using powered equipment (e.g. leaf blowers, brushcutters and lawn mowers). The EPA is aware of government policy to encourage out of hours community use of school facilities if use does not cause noise emissions that interfere unreasonably with the comfort or repose of persons not on the premises. Section 11 of the EIS outlines the need to identify and assess operational noise including out of hours community use of school facilities, as well as identifying measures to minimise and mitigate the potential impacts on the surrounding community. It was commented the ARSB does not appear to have assessed external activities by non-school uses as they were not proposed.		
Waste management	It was suggested the proponent manage waste in accordance with the Waste Management Hierarchy. The Better Practice Guidelines for Waste Management and Recycling in Commercial and Industrial Facilities (EPA, 2012) provides advice to help architects, developers, council staff and building managers to incorporate better waste management practice into the design, establishment, operation and ongoing management of waste services in commercial and industrial developments. The guidelines can be accessed on the EPA website at Better Practice Guidelines for Waste Management and Recycling in Commercial and Industrial Facilities.	A Waste Management Plan will be updated for the school, considering the Better Place Guidelines for Waste Management and Recycling in Commercial and Industrial Facilities (2012) and this will form a condition of approval, in accordance with the Department's standard conditions.	

3.1.7 Heritage Council of NSW

Issue	Comment	Response	Reference
State Heritage Register Items	It was acknowledged the site is not within the curtilage of any State Heritage Register (SHR) items. However, it is in vicinity of Oran Park (SHR No.01695) comprising of an uneven rectangular grassy, vacant lot located approximately 35 metres north of the boundary of 'Oran Park.'	Acknowledged.	
Conservation Management Plan	It was noted the Conservation Management plan (CMP) prepared by Tropman & Tropman Architects for 112-113 Oran Park Drive, Oran Park, was endorsed by the Heritage Council of NSW in May 2019. The Heritage Impact Statement (HIS) has not taken into account any relevant CMP policies relating to views and setting into consideration.	Policy 2.3 within the CMP refers to preserving views between Oran Park House and Oran Park Township. The subject site is not located within the sight lines between Oran Park House and Oran Park Township and therefore will not impact upon the views between the two locations.	
Catherine Park House	It was noted Catherine Park House (within Oran Park) is a prominent landmark which allows for views to and from the property from distant vantage points including Oran Park Town and Camden Valley Way. The CMP prepared by Tropman & Tropman Architects identifies significant vistas in a north-east to southeast arc from the main house. Although the proposed new development would not visually dominate the item as it located at a lower elevation to Oran Park, it is located to the north east of the house and will have some impact on these views and vistas. These impacts must be mitigated by appropriate landscaping along the site boundary to create a visual buffer between the SHR item and the proposed new development. It was recommended plant species planted on the site should be in keeping with those known to have existed in the past on the site or those appropriate to the soils and historic character in the vicinity. Any new perimeter boundary fence should be compatible with existing rural fencing in the vicinity in terms of its height and design.	Noted. Landscape features of the proposed development have been designed to create a visual buffer between the State Heritage Register (SHR) item. The proposed school layout has considered the views to and from Catherine Park House. A new boundary fence is proposed, however, due to School security requirements, a diplomate style fencing is required to ensure the safety of students and staff.	

3.2 Public Submissions

3.2.1 Organisations

Stakeholder	Comment	Response	Reference
Harrington Estates	Participant is Harrington Estates (development manager for Hixon Pty Ltd) which adjoins land on the proposed Catherine Field Primary School. They have been involved as precinct proponents for the rezoning of the Catherine Field Part Precinct. Participant congratulated Department of Education for accelerating the delivery of infrastructure to support a growing community.	Acknowledged.	
	Participant has met with Department of Education to discuss the planning and design of the proposed school. Concern was raised regarding height and location of buildings, verge widths and landscaping along the southern boundary of the site. Participant supplied a draft layout in submission detailing potential subdivision pattern for the adjoining land south of the site. Harrington Estates is proposing rear loaded houses to minimise traffic conflicts with the proposed Catherine Field Primary school. However, the potential subdivision demonstrates there is likely to be in excess of 20 homes facing the southern side of the school. Participant acknowledged the height and location of the proposed school appeared to maximise the playground areas of the proposed Catherine Field primary school. This has resulted in the proposed buildings fronting the south of the site. Participant raised concern regarding the height of the buildings due to the visual and overshadowing impacts. Participant acknowledged their consultation with the Department of Education, however had not reviewed the shadow diagrams supplied as part of the Environmental Impact Statement (EIS).	Extensive consultation has been undertaken with Harrington Estates regarding the overshadowing and height issues. Refer to the attached letter within Appendix R which provides direct and comprehensive response to these issues.	Response to Harrington Submission Appendix R
	Participant requested an amendment of building design. The building design is suggested to be relocated to the north of the site, to remove overshadowing and visual impacts to future	Please see above.	

Stakeholder	Comment	Response	Reference
	residents on the southern boundary. An alternative was suggested to reduce the building height if the proposed school was to remain closest to the southern boundary of the site.		
	Participant raised concern about the street and landscaping design along their common road. This had been raised to the Department of Education previously. Participant suggested they were expecting various outcomes for the school: • Widening the verge to accommodate a proposed cycleway • Construction of the diplomat fencing behind the property line • Articulation of the fence line and inclusion of architectural features • Placement of a hedge and landscaping in front of the diplomat fencing Street landscaping and tree planting to a high standard in keeping with the surrounding areas.	The current design documents comply with the *State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017.* The proposed design is compatible with the future residential areas given the setbacks provided and positively addresses the street frontages, with open play space located to connect to the future parklands to the North West of the school. The scale of the development was supported by Camden Council when developing the design. Verge & Southern Boundary - The fence line is currently articulated between the main pedestrian entry on O'Keefe drive and continues around the corner to the secondary Pedestrian Entry on the Southern Road. Widening Verge - These works are currently outside of the proposed school scope. They are part of a separate DA. Changes to this area can be addressed via the proponent. Hedging would not be feasible due to encroachment on the restricted verge space. This is currently already shown on the Landscape Architecture Plans. Street Landscape - All landscape works excluding the hedging is currently limited to within the school's fence line and boundary. Due to the restricted verge width, it is our understanding that a shared path would be better utilised in this space.	Appendix J - Landscape Plans
	The participant suggested the name of the proposed primary school is confusing. They commented on the location of the school in Oran Park, adjacent to Catherine Park estate.	Naming of the school will be in conjunction with the adopted procedure of the NSW Department of Education. It is the policy of the NSW Department of Education and Communities to choose names for schools and for specific parts of school premises which are appropriate, acceptable to the local school community and do not duplicate past or present	

Stakeholder	Comment	Response	Reference
	Suggestion was made to change the name, as the participant will be identifying the neighbourhood village as 'Catherine Park neighbourhood village' which is close to the proposed school.	names. The Department of Education already operates the Oran Park Public School.	
	The participant raised interest about the potential joint use of the school hall. It was encouraged to open the grounds for community use outside of school operational hours.	Further joint use will be considered by the NSW DoE following construction of the project.	
	The participant supplied: • A memorandum from their planner identifying non-compliances with planning instruments • Comments on the site plan supplied on the EIS • Marked up comments from the EIS • Marked up comments from the Access Report, and suggested non-compliances	As outlined in consultation with Harrington Estate on 7 February 2020, consent may be granted for the purpose of a school that is State Significant Development (SSD) even if the proposed development contravenes a development standard imposed by any environmental planning instrument. SSDAs may breach development standards such as height, and consent can still be granted. The proposal has been reviewed against the relevant objectives of the *State Environmental Planning Policy - Sydney Growth Centres 2006* and RPS believes that the proposal is consistent with those objectives. There are sufficient planning grounds to justify the height. The non-compliances suggest that the seven' Design Quality Principles' of the *State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017* have not considered the residential uses to the south. As outlined above, the design of the school considers its impacts on the proposed residential use to the south. The proposed development's height has been considered so as not to impact upon the neighbouring properties' ability to meet compliance with the DCP provisions for solar access. Further, the buildings have been designed to minimise perceived bulk and scale through appropriate landscaping, building articulation and a fine grain massing.	

3.2.2 Public Submissions

Location	Comment	Response	Reference
Oran Park, NSW	Participant described the development of Oran Park over the past few years. Comment on the requirement for more schools to open Oran Park was made. Participant provided positive comment on the opening of the proposed Catherine Field Primary School.	Support acknowledged.	
Oran Park, NSW	Participant acknowledged there is a child care centre, and two schools in the Catherine Park Estate (one primary school, one high school). Concern was raised regarding traffic impacts of the proposed Catherine Field Primary School. Concern was raised regarding residential parking during school hours. Objection was raised and suggestion was made for the proposed school to be relocated elsewhere in a suburb that does not have schools already. Concerns were raised regarding noise impacts due to school bells and children playing. Participant described experience of living in close proximity to the schools within the Catherine Field estate and reiterated concern of traffic impacts such as double parking. Concern was raised due to the existing width of Catherine Park Estate roads.	The current proposal has considered known developments and associated traffic modelling within the proposed design. The childcare centre referenced in the response to be located across the road is currently not a known feature and as such has not been accounted for. Appropriately sized drop off and pick up zones have been incorporated into the design to accommodate peak demand. This is in accordance with Australia Road Rules no standing parking rule.	

4 CONCLUSION

This RtS has considered the submissions received in response to the public exhibition of SSD 9477. Submissions were received from DPIE, government agencies and the general public. In response, amendments to the proposed development and further information have been provided to address these matters. The proposed development as amended is considered to warrant approval for the following reasons:

- Further information has been provided to address comments.
- The design has been amended to consider the GANSW feedback, and to ensure design excellence is achieved.
- The amended proposal will result in a high quality development, and encourage positive learning outcomes.

Based on the supporting material provided in this RtS in addition to the material provided in the original EIS, DPIE has now been provided with sufficient information and documentation to progress the assessment of SSD 9477. It is requested that DPIE complete the assessment of the SSD and proceed to determination.