Attachment A – Detailed Response to Submissions Table

A response to submissions made by government agencies and other bodies to the public exhibition of SSDA 9579147 is set out in detail below. A total of seven (7) public submissions were received by the following government authorities, agencies and bodies, listed and responded to in alphabetical order as follows:

- Biodiversity and Conservation Division, Environment, Energy and Science (EES) Group (A division of the Department of Planning, Industry and Environment);
- City of Parramatta Council;
- Endeavour Energy.
- Environment Protection Authority;
- Heritage NSW – Aboriginal Cultural Heritage;
- Sydney Water; and
- Transport for NSW.

There were no submissions made by members of the public on the application.

It is noted that of the submissions received that none objected to the SSDA. Rather, they sought clarification or suggested refinements. Refer to a detailed response to matters in the table below.

In addition, an Issues Letter was received from the Department of Planning, Industry and Environment.

Extract from agency submissions	Response (prepared by Architectus)
Biodiversity and Conservation Division (EES Group, DPIE)	
There's no remnant vegetation on site, or records of threatened species. Five (5) planted trees are to be removed. Given the impacts are minor, EES have no comments on the BDAR. However, it is noted that the Environmental Impact Statement states that trees are to be planted in species belonging to the Cumberland Shale Plains Woodland ecological community. EES supports this recommendation.	Noted
EES have reviewed the relevant flood risk analysis for this proposal and advise that there are no outstanding flood risk matters to address. EES has no further flooding comments.	Noted
City of Parramatta Council	
<u>Open Space</u> *The Social Impact Assessment recognises the reduced opportunities for sport and recreation within the school site and the increased demand for recreational facilities facilitated by higher student numbers, which will likely result in cumulative impacts to nearby Council facilities through higher levels of use. It also acknowledges that the remaining playing field lacks facilities required for wider community access, such as toilets and changerooms. To address these impacts, it recommends that the quality of the remaining open space within the site be improved to increase capacity, through the following:*	-
1. Providing adequate shading over paved passive areas to ensure these spaces are used during hot days. *Considering issues such as urban heat and increasing intensity and duration of hot days as a product of a changing climate, adapting paved areas to have excellent thermal comfort will ensure greater use throughout the year. This may include shading trees, landscaping and/or shade sails.*	As detailed within the response to architectural matters prepared by Fulton Trotter Architects at **Attachment B**, the proposal has sought incorporate appropriate shading within and to the periphery of proposed building H to improve thermal comfort and improve amenity for users throughout the year. Shading elements incorporated include: • The main roof of the proposed building provides shading to the central courtyard spaces; • The link roof provided between building H and the existing buildings provide shade to the pedestrian paths as well as to the turfed areas to the South; • The form of Building H provides shading to the playing fields to the South of the building;

	• Outdoor seats with shade umbrellas are provided to the courtyard to the West of Building E; and • The trees provided to the outdoor spaces around Buildings H and E will provide shade to the surrounding areas. When considered on a site-wide basis, these measures are considered appropriate and will complement existing areas of shading across the site, as detailed within the shading diagram prepared by Fulton Trotter Architects at **Attachment D**. In addition to the above, the NSW Department of Education (DoE) have recently provided additional shading at the site (in March 2021) located over the existing games court, located to the west of the site as detailed at **Attachment D**. Further, three small triangular shade sails have been erected over the concrete platform steps adjoining the basketball courts to provide shade for students seated on these steps. The shade sails are red, black and yellow to celebrate and give a visual connection to the local Aboriginal culture and heritage of the community. Overall, it is considered that these existing and proposed measures provide for sufficient shading at the site, delivering a high level of amenity to students, teachers and all users of the site throughout the year.
2. Providing adequate shading over hardcourts to ensure these spaces are used during hot days. *As identified in the previous recommendation, increasing the thermal comfort of these spaces can assist in future-proofing recreational facilities at Pendle Hill High School.*	As discussed above, DoE have recently provided additional shading at the site (in March 2021) located over the existing games court, located to the west of the site. Further, three small triangular shade sails have been erected over the concrete platform steps adjoining the basketball courts to provide shade for students seated on these steps. Please refer to a diagrammatic overview at **Attachment D**. Overall, these recently constructed shade structures, along with further enhancements delivered by the proposed development will ensure that one third of the existing games courts are shaded. This is considered an appropriate level of shade and will provide a high level of amenity to students, teachers and all users of the site throughout the year.
3. Activating other open spaces within the school grounds. *A key strength of Pendle Hill High School is the large amount of open space on site. Investment and embellishment of previously less 'used' areas of open space can increase these spaces ability to perform at a higher standard.*	The existing Pendle Hill High School contains a variety of open spaces across the site, suitable for various play and educational purposes. As noted above, the proposed development has sought to provide for additional shading within the site, complementing recently completed works that will further enhance the amenity, usability and safety of these spaces year-round. With regard to maintenance and embellishment of areas not subject to this SSDA, the Department of Education will review opportunities for future site improvements as required. Given the large amount of open space is noted as a key strength at the

	school site, embellishment works beyond the current School Community Group (SCG) program is not considered to be required at this time.
4. Embellishment of existing hardcourts *To ensure they have desired recreation spaces that perform at a suitable standard.*	The existing Pendle Hill High School contains a variety of open spaces across the site, suitable for various play and educational purposes. As noted above, the proposed development has sought to provide for additional shading within the site, complementing recently completed works that will further enhance the amenity, usability and safety of these spaces year-round. With regard to maintenance and embellishment of areas not subject to this SSDA, School Infrastructure NSW will review opportunities for future site improvements as required. Given the large amount of open space is noted as a key strength at the school site, embellishment works beyond the current SCG program is not considered to be required at this time.
These recommendations are considered critical and should be implemented to ensure superior amenity and enhanced usage by the increased student population. At the same time, these recommendations help minimise any potential cumulative impacts of increased demand on nearby Council facilities which have limited capacity in serving the community at large.	A response to this item is provided above. The proposed development provides significant enhancements to existing facilities, however School Infrastructure NSW continuously review opportunities for future site improvements as required.
Noxious Weeds *The Arboricultural Impact Assessment identifies tree species (Ligustrum spp. and Ailanthus altissima) that are identified as priority weeds in the Greater Sydney Regional Strategic Weed Management Plan (2017-2022). The applicant has a biosecurity duty under the Biosecurity Act 2015 to remove any priority weeds, which should be replaced with indigenous plant species to maintain canopy cover consistent with Council targets.*	Noted. The trees considered noxious weeds are Trees 54, 109 and 115 located outside of the development scope on the northern edge of the school. The school will prioritise their replacement as recommended as soon as practical.
Council's Open Space Team recommends: *All trees declared as 'priority weeds' in the Greater Sydney Regional Strategic Weed Management Plan 2017 to 2022 are to be removed and replaced with appropriate indigenous species to comply with the Biosecurity Act 2015 duties and maintain tree canopy.*	As above
- Amended landscape plans to include embellishment of open space and recreational facilities that adequately demonstrate an increased capacity to meet the physical activity needs of an expanded student population, including: *> Activation and embellishment of 'less used' open space areas* *> Natural and artificial shading of passive paved areas and hardcourts* *> Upgrade of existing hardcourts and playing field*	A response to open space embellishment matters is provided above. Notwithstanding, in response to other items discussed within this letter, updated landscape plans have been prepared by Ground Ink at **Attachment F**.

Social Outcomes *Council's Social Outcomes team has reviewed the SIA submitted with the application and would like to raise the following:* *Section 1.4 of the SIA states Pendle Hill High School Catchment will have a projected shortfall of 2,711 student places by 2036. Elton also notes that the "The GSC's Central District Plan acknowledges these challenges and proposes two guiding principles to assist with community infrastructure delivery – land use efficiency and joint and shared use. Specifically, the GSC states that future school planning will need to focus on efficient land use regarding school sites." It is not stated where the additional places in the Pendle Hill High School Catchment will be provided. Council Officers wish to ensure that short term planning does not result in the use of demountables to meet the long-term needs of students.*	This item is acknowledged and has been taken into consideration by School Infrastructure NSW as part of broader enrolment projections and planning across the SCG, noting that the proposed redevelopment seeks to address an existing and immediate need at the subject site. As detailed at Section 1.9 of the EIS, it is acknowledged constraints to existing facilities at the site, which are undersized, hard to access or disparate when assessed against the Educational Facilities School Guidelines (EFSG). The proposed development seeks to address these known issues and improve facilities across the site to provide for an enhanced experience for students. Other options for addressing for the future demand within the School Community Group have been explored, such as catchment boundary changes, to redistribute student capacity with student demand, however the ability of these measures to relieve demand pressures is limited and has been exhausted. Also as detailed within the EIS, it is noted that School Infrastructure have recently obtained separate approval for minor works at the site (through a Complying Development Certificate (CDC)), including the internal refurbishment of part of existing school Buildings C and E as well as the erection of temporary portable classroom buildings, along with associated services adjustments. The use of temporary portable classroom buildings are an essential short term tool to the to provide for the decanting of operations and facilitate the broader redevelopment of the site, however are a short term solution and are not relied upon to meet the long term needs of the SCG.
Section 7 provides a thorough assessment of impacts. Council notes that by 2036 there will be a projected shortfall of 2,711 student places in the Pendle Hill High School Catchment Area, yet this development is only to accommodate 1,320 students. Once the student number is increased to 1,320 the square metres of open space will decrease from 51sqm/student to 18sqm/student. Page 10, and The NSW Department of Education's Planning Guidelines for Schools (Draft) 2020 states that 10sqm of open space per student is the minimum. *Therefore, the maximum student population with current open space provision (23,000sqm) at Pendle Hill High School is 2,300. Research commissioned by the Northern Sydney Local Health District has identified that 25sqm should be the benchmark free play space per student when planning and designing schools and ensure loose play equipment is available and that the probability of students meeting physical activity recommendations increased sharply between 15 and 25sqm per student (Anne Grunseit, Blythe O'Hara, Bradley Drayton, Vincent Learnihan, Louise L Hardy, Eve Clark, Paul Klarenaar, Lina Engelen https://bmjopen.bmj.com/content/10/6/e034586).*	Matters relating to current and projected enrolments as a result of the proposed development are discussed above. However for clarity, the school currently accommodates 1,080 student enrolments, however this is to be increased to 1,320 students under the proposed development. Notwithstanding, the proposed development has been designed to be capable of supporting a future population of up to 2,040 students. This is not proposed under the current application however has been considered by the SCG as part of broader enrolment planning across the catchment, With regard to open space, the school currently has 62,260m^2 of open space and will provide for 60,860m^2 open space post development. This equates to a rate of 57.7m^2 and 46.1m^2 open space per student under pre and post development scenarios respectively. Under the future potential scenario (2,040 students, not the subject of this DA), this would result in 29.8m^2 open space per student. With regard to play space, the school currently has 41,000m^2 play space and will provide for 29,000m^2 play space post development. This equates to a rate of 38.0m^2

	and 22.0m^2 play space per student under pre and post development scenarios. Under the future potential scenario (2,040 students, not the subject of this DA), this would result in 14.2m^2 play space per student. The distinction between play space and open space is to acknowledge that not all open space can be used for active play. Having regard to the above, whilst this is acknowledged as a minor reduction over existing circumstances owing to increased enrolments along with land take associated with the redevelopment, the proposal exceeds minimum requirements within the NSW Department of Education's *School Assets Strategic Plan,* which requires a minimum of 10m^2 outdoor play space per student. The proposed development as sought under this SSDA is therefore consistent with both Department of Education Guidelines and Northern Sydney Local Health District research provided by Council in their submission.
Council Officers are concerned that demountables are and will be used more to meet the gap in school places following the completion of the upgrade, reducing the open space below 15sqm per student, thus limiting the probably of students meeting physical activity requirements and increasing reliance on Councils open space/sportsgrounds. This is particularly of relevance as all sportsgrounds in Catchment 1 (which includes Pendle Hill) are operating at capacity (17%) or above/far above capacity (83%). *Council Officers recommend a condition of consent that demountables cannot reduce the open space per student below 15sqm, nor utilise Council sportsgrounds to meet the curriculum requirements for physical activity as a result.*	Matters relating to enrolment and student capacity are addressed above. With regard to temporary portable classrooms, it is noted that School Infrastructure NSW has recently obtained separate approval for minor works at the site (through a Complying Development Certificate (CDC)), including the internal refurbishment of part of existing school Buildings C and E as well as the erection of temporary portable classroom buildings, along with associated services adjustments. Notwithstanding, School Infrastructure NSW do not agree to Council Officers recommendation for a condition of consent that would restrict the potential for use of demountables on site. The use of demountable buildings are an essential short term tool to the to provide for the decanting of operations and facilitate the broader redevelopment of the site, however are a short term solution and are not relied upon to meet the long term needs of the SCG. Further, it is noted that such a condition would not be enforceable or valid as the works can likely be undertaken as exempt development. As such, the suggested condition is not supported.
Page 67 of the SIA notes: "The following two recommendations seek to highlight potential opportunities to ease local open space shortfall: *1. A share use agreement for playing field at Pendle Hill High School could provide out of school hours use to the broader community. Demand for open space and recreational facilities are traditionally highest outside of business hours and on the weekend.* *2. A share use agreement for hardcourts at Pendle Hill High School could assist Parramatta Council to meet current and future provision rates for hardcourts across the LGA. Currently, there are four basketball courts and two tennis courts at Pendle Hill High School.*	As detailed at Section 6.8 of the EIS, it is noted that Council and School Infrastructure NSW are currently in discussions about future partnership opportunities. A Memorandum of Understanding (MOU) exists between Council and School Infrastructure NSW relating to such partnership opportunities. School Infrastructure NSW will continue to liaise with Council to determine any such arrangements regarding the sharing of facilities. On this basis, it is not considered that a condition of consent is not required.

Council Officers recommend a condition of consent that Pendle Hill High School agree in principle to signing a lease agreement with Council to allow use of the sports field outside of school hours on weeknights, and on weekends. The School should also be included in the NSW Government's Share our Space Program which opens the school grounds to the Public during the School Holidays. *This will also require a plan of management to be established as well as clear definition of secure and publicly accessible areas for after-hours community use to be included with the proposal.*	
Traffic and transport *In summary, Traffic has very significant concerns regarding the under provision of on-site staff parking as there is a shortfall of 30 parking spaces.*	A response to traffic matters is provided below and supported by the updated Transport and Accessibility Impact Assessment (TAIA), prepared by TTW at **Attachment I.**
Car Parking Rate *The existing school carpark has capacity of 67 parking spaces. After the school redevelopment, the carpark capacity will be reduced to 57 car parking spaces despite the number of staff increasing to 102. Based on a survey completed by staff at the school, the required parking rate was determined to be 0.85 parking spaces per staff. This will mean that the development has a shortfall of 30 car parking spaces.* *Consideration is given to the fact that as part of the school redevelopment, there will be improvements made to both active transport and public transport facilities by implementing student safety measures and education for road safety, encouraging staff car-pooling and providing them with end of trip facilities for cyclists which will help reduce reliance on private vehicles by staff. However, these positive steps will not entirely address the car parking shortfall of 30 spaces.*	Whilst the site is identified as accommodating 67 spaces at present, it is noted that many of these spaces do not comply with relevant Australian Standards. As such, the proposed development seeks to resolve this through revised line marking which will maintain a total of 57 compliant car spaces at the site. From an urban design perspective, the redesign of the car park layout also results in the opening up of that part of the school and improves permeability. , The car park is currently an L shape and will become linear, removing a part of the carpark that currently sits in between buildings and open spaces at the school. As detailed in the updated TAIA at **Attachment I**, 57 car parking spaces is considered reasonable for a future staff population of 102 teachers. There is no car parking standard for schools in the Parramatta LGA, however the transport consultant TTW analyses local provisions for six nearby council areas and found that the standard in these LGAs was either 1 or 0.5 car parking spaces per staff member. Accordingly, provision of 57 car spaces equates to a rate of 0.5 spaces per staff member and therefore is considered consistent with the approach being taken in adjoining council areas. It is noted that 0.5 spaces per staff is the adopted rate in surrounding Auburn, Ryde and Cumberland (former Holroyd) LGAs. Through the conditions of consent, Pendle Hill High School will be preparing a School Transport Plan designed to increase active and sustainable transport use by staff and students. This will decrease the demand for on-site parking over the long term and is consistent with the Transport for NSW policy to encourage sustainable mode shift. Refer to further discussion on this issue provided in the updated TAIA at **Attachment I**.

It is noted that Cornock Avenue has a capacity of 36 car parking spaces. The shortfall of 30 car parking spaces from the redevelopment will result in this street reaching its on street parking capacity. This will unduly compr[om]ise residents' reasonable expectations to utilise some on street parking as well as affect driver sight distances when residents leave their properties. *Increasing the demand for on-street parking is also likely to increase occurrences of illegal parking. Council therefore strongly recommends that the on-site car parking rate is increased to meet the 87 spaces required by the recent study to ensure residential amenity is maintained.*	A response to off street parking provision is provided above. In relation to on-street parking, following consultation with Council on this matter, the project team have been advised that no concerns have been raised by the public regarding this issue. Further, during the interim period prior to full delivery of the bus network to support the school, the available on-street parking is noted as being within accepted levels. This can be attributed to parking patterns of residents, who are more likely to require the parking before and after standard office hours (i.e. 9:00am to 5:00pm), whereas school staff would only be parking in the street throughout the day within this period (i.e. arriving from 8:00am and departing before 4:00pm) in the majority of cases. In this regard there is considered to be minimal overlap in the demand for the parking between staff and residents throughout the day. Refer to further discussion on this issue provided in the updated TAIA at **Attachment I**.
<u>School Pick up and Drop off</u> *The TIA proposed Kiss and Ride areas in the following locations:* *Binalong Road northbound – primary kiss & ride. Binalong Road southbound - North of pedestrian crossing. Burrabogee Road westbound - East of new pedestrian crossing. Burrabogee Road eastbound - West of Knox Street. Bungaree Road northbound - South of pedestrian crossing. Bungaree Road southbound - South of Cornock Avenue; and Favell Street westbound - Outside the existing pedestrian entry* *It is noted that a Kiss and Ride location in Favell Street may not be required due to the low demand, however, the overall strategy is acceptable.*	Noted
Oversize vehicles using local roads require Council's approval. The applicant is to be required to submit an application for an Oversize Vehicle Access Permit through Council's Traffic and Transport Services, prior to driving through local roads within Parramatta LGA. *Reason: To ensure maintenance of Council's assets.*	Noted.
<u>Proposed Raised Pedestrian Crossings</u> *Upgrade of the existing and new raised pedestrian crossings are proposed at the following locations:* - *On Binalong Road north of the site.* - *On Binalong Road south of the site.* - *Burrabogee Road at Knox Street.* - *Bungaree Road at Cornock Avenue*	Noted.

The TIA demonstrates that the above locations will meet Council's interim warrants for Raised Pedestrian crossings. Accordingly, the proposed works are supported.	
<u>Recommended Traffic Conditions:</u> *As noted above, this proposed reduction in parking is not supported on traffic grounds due to the impact it will have to the current local streets off-street parking. However, should the development be approved, the following traffic conditions are recommended to be included:* *Prior to the issue of a Construction Certificate:*	This item is acknowledged, and it is anticipated this will be addressed as a condition of consent, however with a number of suggested amendments provided below.
1. Parking spaces are to be provided in accordance with the approved plans and with AS 2890.1, AS 2890.2 and AS 2890.6. A total of 87 parking spaces is to be provided with the spaces affected by the reduced aisle width within the northern most parking module to be marked as Small Car Spaces. *Reason: To comply with the Australian Standards.*	As discussed within this table, the proposed car parking capacity is to be maintained at 57 spaces. Refer to a detailed response to this item at Section 3.8 of the TAIA at **Attachment I**.
2. The applicant is to submit a separate application for the proposed line marking and signage for the proposed Kiss and Ride spaces near the school as well as the modifications to the bus bay in Binalong Road to Council's Traffic and Transport Services for consideration by the Parramatta Traffic Committee under Delegated Authority for Council's approval. The construction of the approved treatment is to be carried out by the applicant and all costs associated with the supply and construction of the works and appropriate signage are to be paid for by the applicant at no cost to Council. *Reason: To comply with Roads Act 1993.*	This item is acknowledged, however it is suggested that any condition be required prior to operation of the proposed development, on the basis these works would not need to be finalised prior to commencement of construction and may need to be scheduled during school holiday periods which would impede the construction program. Recommended condition of consent: *Prior to operation, the applicant will prepared a detailed line marking and signage plan for the kiss and ride zones. The preparation of the plan should be in consultation with City of Parramatta Council and approved by the Paramatta Traffic Committee.*
3. Detailed engineering design plans of the proposed raised pedestrian crossings in the locations listed below are to be submitted to Council's Traffic and Transport Manager for consideration by the Parramatta Traffic Committee and approval by Council: – *Binalong Road at the northern side of the school* – *Binalong Road at the southern side of the school* – *Burrabogee Road near Knox Street* – *Bungaree Road north of Cornock Avenue*	This item is acknowledged, and it is anticipated this will be addressed as a condition of consent to the effect of: *All road and traffic works outside of the school boundary must be designed to meet the requirements of Council or Transport for NSW (whichever is applicable). The necessary permits and approvals must be obtained prior too the pavement and/or road construction works.*

The construction of the approved treatment is to be carried out by the applicant and all costs associated with the supply and construction of the traffic facility and appropriate signage are to be paid for by the applicant at no cost to Council. *Reason: To ensure maintenance of traffic flow and safety on the surrounding road network.*	Note however that works along Binalong Road to the north of the site should be excluded from any condition, as these works are being delivered by Council outside of this SSDA process.
During Work *Occupation of any part of the footpath or road at or above (carrying out work, storage of building materials and the like) during construction of the development shall require a Road Occupancy Permit from Council. The applicant is to be required to submit an application for a Road Occupancy Permit through Council's Traffic and Transport Services, prior to carrying out the construction/restoration works.* *Reason: To ensure proper management of Council assets.*	Noted. Standard Advisory Note under SSD consents references this requirement.
Oversize vehicles using local roads require Council's approval. The applicant is to be required to submit an application for an Oversize Vehicle Access Permit through Council's Traffic and Transport Services, prior to driving through local roads within Parramatta LGA. *Reason: To ensure maintenance of Council's assets.*	This item is acknowledged, and it is anticipated this will be addressed as a condition of consent.
The Use of the Site *One year from the issue of the Occupation Certificate, and every year for 2 years thereafter, the applicant shall submit to the satisfaction of Council's Manager Development & Traffic Services a review report on the effectiveness of the Green Travel Plan. The reviews shall include surveys of modal share and vehicle trip generation for the various land uses within the development during peak and off-peak periods. The review shall also include any recommendations for improving the effectiveness of the plan. Any recommendations made to improve the effectiveness of the plan shall be incorporated into an updated Green Travel Plan.* *Reason: To ensure the effective management of the Green Travel Plan.*	A condition of consent is suggested that requires prior to commencement of operation that a School Transport Plan be submitted to the satisfaction if the Planning Secretary, to promote the use of active and sustainable transport modes. It will be updated annually and implemented.
Urban Design *A. SEAR's requirements*	As detailed within the submitted EIS and architectural design report, the proposed development responds appropriately to its context and surrounds. However, for completeness in response to Council's comments, an overview of key built form considerations is provided below.

The SEARs require the proposed development to address the following Built Form and Urban Design considerations: *- the height, density, bulk and scale, setbacks and interface of the proposal in relation to the surrounding development, topography, streetscape and any public open spaces, including legibility from the bus stops along Binalong, Burrabogee and Ballendella Road and the site, and the inclusion of a pedestrian link connecting Binalong Road, Knox Road and Cornock Avenue and the site.*	*Height, bulk and scale* • The school is situated in a low-density residential area where the adjoining properties are all 1-2 storeys detached homes. In this respect the land use character of the school differs to the land uses surrounding. However, the school has existed at this location since 1965 and so in this respect the proposed augmentation of the educational land use does not represent a significant change in the prevailing character of the area. • The proposed building is similar in height to the existing buildings at the school. When viewed from Binalong Road there is a subtle transition in building heights from the roof of existing built form (Building D at RL 70.11), to the parapet (RL 70.65) and the roof ridge (RL 73.0) of the proposed Building H. See Figure 24 in the EIS. *Setbacks* • The building is located with generous setbacks from both Binalong Road (15,850mm) and the adjacent Northern boundary of the site (10,210mm). *Streetscape and interface with surrounding built form* • As discussed above the character of the proposal is the same as what is presently located on the site, being an educational establishment with medium density built form up to maximum RL 73.00. • The interface with the street of the school is improved by the proposal as the new building creates a clear street address and main entrance to the school on Binalong Road, where previously there was no clear main entrance to the school. This is reinforced by the widening of the public footpath across the length of Binalong Road, as well as a further increased widening at the entry gate and stair to create a welcoming and open public entry to the site. *Topography* • The site topography is sloped with the proposed building being on a higher point of the site. To manage the relationship of the building with the residential homes on Binalong Road a generous setback is proposed as well as screening louvres on the Binalong Road façade and understorey canopy to preserve the privacy of residents. *Open spaces*

	• Four open space areas are included in the proposal as detailed in the EIS. The four open space areas create a play area for students to gather and play and connect to create a central spine from Binalong Road connecting through to the Assembly Area. *The bus stops along Binalong Road* • The main bus stop for the school is the one located on Binalong Road in front of the proposed building. The bus stop will be visible from the building although there will be a setback of 25.85 metres. It is proposed to retain the length of the existing indented bus bay along Binalong Road, and providing an increased footpath width as a waiting area. For a further detailed response to built form considerations, refer to the EIS and supporting architectural design report, as well as the supplementary response to design matters prepared by Fulton Trotter Architects at **Attachment B**.
<u>Publicly accessible pedestrian links through school grounds</u> *The submitted documentation shows some pedestrian connections to the south of the grounds connecting the car park and the adjoining streets but they appear to be primarily for students and staff rather than publicly accessible CPTED integrated connections through the site.* *The long-term master plan (Architectus) for the school included in the Design Report indicates a street along the southern boundary between Cornock Avenue and Binalong Road also linking to Knox Road. The submitted documentation does not include this as a feature in the current scope of works. It is the opinion of Urban Design that if this is not developed now it is unlikely to be developed later.* *Ideally this link should be a formed laneway 9m wide (6m vehicular + 3m pedestrian & cycle shareway) that can accommodate service and emergency vehicles and has visual surveillance from neighbouring properties. This laneway may be closed to regular traffic with bollards but should otherwise read as a public street.*	During the master planning process, consideration was given to the inclusion of a pedestrian link through the site providing a connection from Binalong Avenue to Knox Street and Cornock Avenue. However, it was considered by the current design team that the inclusion of this pedestrian link would result in a number of impacts relating to safety and security, including additional ongoing management requirements, along with significant land take (approximately 3,000m^2) to the southern portion of the site. As such, this option was not pursued at the site. Fulton Trotter Architects provided a plan showing the indicative location of the pedestrian link and the impact on open space. This is provided at **Attachment B**. The primary use of school grounds is to provide safe outdoor learning and play areas for students. To facilitate this the Department of Education provides security fencing, access controls and other complementary strategies. The provision of the suggested pedestrian link would necessitate additional physical and management measures, including security presence and it not considered to be a desirable outcome for the operation and management of the school ongoing. Through the design of the proposed development and as part of the project working group, both Council's transport division and Transport for NSW were consulted on this option and advised that the through-site pedestrian and bicycle link and is not identified within or supported by existing transport planning document, including the Parramatta Ways Walking Strategy nor the Parramatta Bike Plan. As such, this option was not explored further.
Fig 1: Example of publicly accessible pedestrian through link in a NSW School: Leichhardt Secondary School has a cycleway/pedestrian link from Moore Street W to Balmain Road, this link runs between the school and the playing fields and	This item is acknowledged. Refer to a response to this item above.

is fenced on both sides maintaining safety and security of school occupants but also allowing permeability for the general public. (Source: Google Maps) *[refer image in submission]* *Fig 2: Street View of publicly accessible pedestrian through link in Leichhardt Secondary School, NSW (Source: Google Maps)* *[refer image in submission]*	
<u>Bulk of building</u> *The site is elevated along Binalong Road - this combined with the scale of the building and the cantilevered roof appears bulky along the northern boundary with the existing context of predominately one and two storey residential dwellings. Should the scale of building not be altered, large canopy tree planting with understory screen planting along this edge is recommended to provide some screening and visual privacy to the adjoining residents.*	A number of screening elements and a landscape buffer have been provided to the northern boundary of the site to limit the potential for visual privacy impacts to neighbouring properties. Proposed screen planting is to comprise native Cumberland Plain Woodland trees of Eucalyptus Maculata, Eucalyptus Molecanna and Melaleuca Decora varieties of expected mature heights of 30 metres, 25 metres and 7 metres respectively. These trees will provide appropriate screening along this northern boundary. The understorey planting also consists of native species of Bursaria, Indigofera and Syzygium varieties that grow to a minimum height of 2.0m providing additional screening complementary to larger plantings. Refer to full landscape details, including a planting schedule, provided in the updated landscape plans, prepared by Ground Ink at **Attachment F**.
<u>B. Public Domain</u> *A public footpath approximately 3m wide to accommodate pedestrians, especially student movement, has been provided along the extent of the property boundary along Binalong Road. An upgraded public domain provision should be conditioned as part of the development.*	The proposed development includes extensive widening of the footpath along Binalong Road by 4.0m, within site boundaries, as detailed in the submitted architectural plans. This is considered an appropriate design response under the circumstances with no further widening (or any condition of consent) considered to be required.
Increased landscaping at northern boundary for privacy to residences to the north as noted in the comment for 'Bulk of building'.	Refer to a discussion to this item above.
While access is provided at the new entry, it lacks a sense of generousness i.e. the stairs are narrow, and the ramps appear boxed in. Also, the criss-cross of the w/c access interrupts movement on the stairs causing congestion and confusion on the stair landings which can be unsafe.	As detailed within the EIS, the proposed development seeks to address existing known constraints of the site, including a lack of presentation and streetscape address along Binalong Road. Accordingly, the siting of the proposed building is the result of a detailed master planning process, which will provide a new and improved presentation to the school, resolving existing known access and legibility issues within the surrounding street network. In relation to the ramp and stairs, the proposed entry arrangement has been configured in order to provide a generous entry pathway into the school from Binalong Road, with consideration to the topography of this north eastern portion of the site. The ramp pathways have been provided in order to provide a simple accessible path

	of travel that is well integrated with the public domain and the main access way to proposed Building H and through the school generally. The proposed access ramp has been designed to facilitate equitable access and provide for a suitable presentation within the streetscape, whilst maintaining reasonable ramp lengths and form against the setting of the proposed building. The width of the proposed stair is 3700mm, allowing for rows of up to five students to use the stairs at any one time and is considered sufficient to support the population that will be using this entrance at peak times. The proposed access ramp has been configured to intersect stair landings to ensure that the accessible path of travel is integrated within the main entrance path. The proposed arrangement has been explored by the design team in conjunction with the accessibility consultant and is considered to be the most appropriate and equitable approach under the site circumstances. During consultation with the State Design Review Panel, the panel asked that the architect explore other design options for the ramp and stairs to reduce the vertical separate and scale of the ramp and stairs. Fulton Trotter Architects looked at an option to relocate the proposed ramps to one side of the entrance stairs (the Northern side). This would allow the area to the South of the new entry stairs to include more significant landscaping around the existing trees. However, the impact of this would be that the area to the North of the stairs would significantly reduce the generous garden beds provided between the ramps. This would increase the visual impact of the ramps in this area – presenting a larger expanse of concrete, handrails and retaining walls to the street frontage. The final chosen design seeks to balance the requirement to allow for safe egress for students and a sense of generousness for users of the ramps, with the desire to balance the built form with landscaping to create a better transition between the new building and the residential area on Binalong Road. In summary, the proposed ramp aisle widths pf 1500mm are compliant with Australian Standards provide for sufficient circulation space and supporting landscaping, without dominating the presentation of the building within the streetscape. For these reasons, we believe that the proposed ramp and stair arrangement is suitable for the site.
Due to loss of the sports field, significant additional tree canopy planting should be considered in spaces where future buildings are not planned.	For clarity, no sports field is being lost as part of the proposal, however extensive additional tree planting is proposed across the site as detailed within the EIS and this RTS.

Urban Design recommendations: *A. A direct, signposted, well-lit and publicly accessible pedestrian through link (min 3m wide) in the non-secure/non-fenced area of the school grounds connecting Binalong Road, Knox Road and Cornock Avenue is recommended (aligned with Architectus' Master Plan). This link should be designated as a Right of Way (ROW) in the land title.*	Refer to a response to this item above.
B. Large canopy tree and understorey screen planting should be conditioned as part of the development to provide visual privacy and screening to properties to the north of the proposed school building (82-88 Binalong Road).	Refer to a response to this item above.
C. Applicant is advised to add more large trees (min 15 m tall), within the property boundary, at the embankment along Binalong Road to provide shade to the 3m wide footpath and children getting on and off the buses.	Refer to a response to this item above.
D. A more generous entry off Binalong Road is recommended with wider stairs and deeper landings to allow improved integration and safety of the access ramps.	Refer to a response to this item above.
Department of Planning, Industry and Environment	
Provide a consolidated list of mitigation measures. Whilst Section 8 of the Environmental Impact Statement (EIS) cross-references other parts of the EIS, it is not a consolidated list. A consolidated list is required as set out in the Secretary's Environmental Assessment Requirements (SEARs).	A consolidated list of mitigation measures has been prepared by Architectus and is provided at **Attachment J**.
A detailed planting schedule is required as set out in the project SEARs. Whilst Figure 32 of the EIS provides a planting plan and Appendix G provides a planting palette, no detailed planting schedule has been provided.	A preliminary planting schedule has been prepared by Ground Ink and is provided in the revised Landscape plans (**Attachment F**). The planting palette will be developed further in consultation with Aboriginal stakeholders as part of the Connection with Country strategy. It is expected this process will continue into the post-approval phase and as a result a planting schedule provided now can only be indicative. A condition of consent is suggested that would require the applicant to provide a final schedule once consultation has occurred.
Demonstrate that the existing noise level measurements set out in the Acoustic Report (Appendix X of the EIS) are appropriate for predicting anticipated operational noise impacts, given that the existing number of students is significantly (10-13 times) lower than the maximum potential existing and post-development number of students. Noting that:	Matters relating to current and projected enrolments are discussed above, noting the school currently accommodates 1,080 students enrolled, however this is to be increased to 1,320 students under the proposed development. Notwithstanding, the proposed development has been designed to be capable of supporting a future population of up to 2,040 students. This is not proposed under the current application

- *page 31, penultimate paragraph refers to existing school enrolments of 378.* - *Table 7.1, page 32, provides estimates of outdoor play area usage based on existing maximum capacity of 1,080 students and post-development maximum capacity of 1,320 students.* - *the noise level measurements discussed in Table 7.2, page 32 are based upon "Approx. 100 students playing (measured in Assembly area)" and "Approx. 10 students playing in games court".*	however has been considered by the SCG as part of broader enrolment planning across the catchment. The existing noise measurement was carried out on a typical school day in consultation with the school staff to confirm its validity, as detailed at Section 7.1.1 of the Acoustic report. Figures of 100 students in the assembly area and 10 students on the hard courts were chosen to represent current noise levels, as these are considered typical of a regular school day and were the actual number of students observed in these spaces on the day that testing was completed. Noise sources included students running on hard surface, ball being kicked around, students screaming and talking in raised voices, music from phones and basketball bouncing in games courts. Aurecon has tested the acoustic impacts of the current population and used this as a base to determine the noise level for similar activities for a student population equivalent to the current capacity (1,080 students) and the future capacity (1,320 students). The model for 1,320 students assumes the majority of students will be in the main open space/play areas being: • Up to 650 students playing on the oval and adjoining outdoor play areas; • Up to 300 students playing on the outdoor spaces along Binalong Road; • Up to 30 students on the hard courts north of Building E. The model assumes the remaining students (350 students) will be distributed between the other open space areas being the Assembly space, Building C, Building F and other games courts. Aurecon assessed that given the distance between these play areas, the setback to surrounding residences and the screening effect provided by school buildings, noise impacts from these areas the noise level will increase insignificant beyond what is caused from the use of the three main outdoor areas only. The noise levels based on this methodology were measured to be between 47and 69 decibels from the facades of the nearest affected receivers. The proposal represents a 1-2 dB increase when compared to the current student capacity, and therefore the impact of the proposal compared to that of the current approved activities for the school is minimal. Refer to a detailed response to this item prepared by Aurecon at **Attachment H**.
Consideration should be given in Section 8.2 of the Acoustic Report to construction noise and vibration impacts upon teachers and students that will be involved in learning activities and associated activities during the 12.5 month construction phase. Appropriate mitigation measures should be developed and recommended.	This item has been taken into consideration in the updated Preliminary Construction Management Plan (PCMP) at **Attachment G**.

	The contractor will apply mitigation measure across the project to avoid where possible any interruption to staff and students during normal school programming/hours. The work zone will be separate from the existing buildings at the school and a 2.4m high acoustic rated ply hoarding will be erected to all site compound boundaries to mitigate against construction noise omissions. Excessively noisy works (saw cutting, jack hammering and demolition etc.) will be undertaken outside school operational hours and during school holidays.
More information is required to explain the trip generation, trip generation on the network and assignment of additional trips during the AM and PM peaks set out in pages 94 and 95 of the EIS. In addition, the relationship of this information to Table 23 is to be clarified.	Trip generation calculations have been clarified, refer Section 4.2 of the TAIA at **Attachment I**.
Provide further details to supplement Section 7.2 of the Transport Impact Statement (Appendix L of EIS) of measures to minimise any potential conflicts between construction activities and continuing learning activities and associated school activities taking place concurrently in the school.	The construction zone will be fully separated from all ongoing education and school activity areas. An updated PCMP has been prepared by Taylor Construction Group. Section 7 of the TAIA has been updated to reflect this strategy as detailed at **Attachment G**. As discussed above, the updated Preliminary Construction Management Plan (PCMP) provides examples of mitigation measures to be taken to reduce impacts to school activities during construction. The mitigation measures will be finalised when the final CMP is prepared, prior to commencement of works.
Work zones should be clearly shown and effectively separated from school activities areas.	The construction zone will be fully separated from all ongoing education and school activity areas. An updated PCMP has been prepared by Taylor Construction Group. Section 7 of the TAIA has been updated to reflect this strategy as detailed at **Attachment G**.
Mitigation measures should be developed to better inform future construction traffic management planning with the objective of maintaining a quality and safe learning environment for students, teachers and other stakeholders and minimising risks of conflicts with construction movements.	This item has been taken into consideration in the updated PCMP at **Attachment G**.
The Preliminary Construction Management Plan (Appendix N of the EIS) provides limited information (Section 2.1 - Potential Constraints Impacting on the Construction Methodology) on the identified constraints. Further consultation should be undertaken and additional information provided to clearly delineate how and where day to day learning activities and associated schooling activities are to take place during the construction phase.	This item has been taken into consideration in the updated PCMP at **Attachment G**.
Areas where construction cannot occur (No Go Zones) should be identified along with designated and potentially available construction zone areas. This should be provided to better inform the planning of construction activities and maintaining a quality and safe learning environment for students, teachers and other stakeholders and minimise risks of conflict with construction activities. This	This item has been taken into consideration in the updated PCMP at **Attachment G**.

information should be shared with consultants engaged in construction management impacts, particularly traffic and noise/vibration, their reports updated, and further information provided in the Response to Submissions.	
Endeavour Energy	
Endeavour Energy has noted the following in the Services Infrastructure Report addressing the suitability of the site for the development in regard to whether electricity services are available and adequate for the development. *The proposed new padmount substation to be installed along Binalong Road is shown in the following extract of the Proposed Site Plan.* *From Endeavour Energy's perspective the fact that provision is being made for a padmount substation is a positive. Endeavour Energy's general requirements is for a padmount substation to be at ground level and have direct access from a public street (unless provided with appropriate easements for the associated underground cables and right of access).* *As shown in the following extract of Endeavour Energy's Mains Design Instruction MDI 0044 'Easements and Property Tenure Rights', Figure A4.3 'Padmount easements and clearances', padmount substations require:* - *Easement with a minimum size of 2.75 x 5.5 metres (single transformer).* - *Restriction for fire rating which usually extends 3 metres horizontally from the base of the substation footing / plinth and 6 metres vertically from the same point.* - *Restriction for swimming pools which extends 5 metres from the easement (which may not be required for non-residential use). [See image in submission]* *The easement should not cross property boundaries but the restriction/s may affect any adjoining property provided they are able to be registered on the title to that property.*	This item is acknowledged, and it is anticipated this will be addressed as a condition of consent. An easement for the substation will be arranged by DoE as the landowner prior to occupation.
The storage of and / or use of flammable, combustible, corrosive or explosive material within the fire restriction should be avoided.	This item is acknowledged, and it is anticipated this will be addressed as a condition of consent.
<u>Fire planning</u> *In addition the following matters also need to be considered in regard to the fire restriction:*	This item is acknowledged, and it is anticipated this will be addressed as a condition of consent.

- *Personnel access doors and fire exit doors to a building are not permitted within the fire restriction area.* - *Gas mains/pipes shall not pass through the fire restriction area.* - *A 10 metre clearance distance shall be maintained between substation and fire hydrants, booster valves, and the like in accordance with AS2419.1 'Fire hydrant installations System design, installation and commissioning' as updated from time to time.* *- Consideration should be provided to the appropriateness of the landscaping relative to the fire restriction for the substation. Any landscaping that potentially could transfer / provide connectivity for flame or radiant heat from a fire in the substation to a dwelling or building should be avoided.*	
<u>Planting</u> *As shown in the following extract of the Landscape Master Plan the proposed extensive tree planting between the padmount substation and Building H – North will need to reconsider if the proposed plantings achieve the foregoing requirements. In addition, as per Endeavour Energy's previous submission, appropriate planting needs to occur in proximity of the overhead power lines to the Binalong road rod frontage needs to be considered.*	The proposal was assessed by the project fire engineering who confirmed that provided that the landscaping doesn't prohibit occupants from evacuating safely, and fire fighters from accessing the building then there will be negligible impact. The landscaping will not prevent either of these activities and therefore is considered acceptable.
<u>Easement Release</u> *In regard to the existing easement for padmount substation no. 15741 which is to be decommissioned, the applicant can make an application for the release of the redundant easement. Under Endeavour Energy's Company Policy 9.2.3 'Property Tenure for Network Assets', the company will assess all applications for the release of easements to identify and manage risks to its network, commercial and community interests. The company may seek compensation for the extinguishment of property tenure. No easement is considered to be redundant or obsolete until it is released under this policy.* *Applications for the release / extinguishment of an easement can only be made by the registered landowners of the encumbered property and in this instance can be done as part of the application for connection of load or capital works project for the development project i.e.. where alternative / new network arrangements are to be put in place.* *Endeavour Energy's Network Connections Branch (contact via Head Office enquiries on business days from 9am - 4:30pm on telephone: 133 718 or (02) 9853 6666) are managing the conditions of supply with the proponent and their*	There was no design intent to decommission substation no. 15741. The intent was to only decommission the existing customer intake cable, i.e. disconnect the school power supply from substation no.15741 once the new pad mount substation is in place.

Accredited Service Provider (ASP) and will advise of Endeavour Energy's requirements for the release of easement.	
Prudent Avoidance *As part of the further acoustic assessment consideration should also be provided to the new padmount substation required to facilitate the proposed development. The transformers in substations may emit a hum – especially when under heavy load say in the summer peak when use of air conditioning is at its highest. The noise is usually not perceptible enough to be regarded as disruptive and/or to the point where amelioration measures are required. As noise levels, frequency and timing can vary and people perceive sounds differently, to minimise any potential exposure to intrusive noise, the siting towards the electricity infrastructure of less sensitive uses or parts of the building not regularly occupied is recommended.*	The design has followed Endeavour Energy design guideline (MDI 0044 Figure A4.3). In addition, the substation is located relatively further from Building H (approximately 13m) or the nearest neighbour building (approximately 17m). Once the transformer noise detail is available from Endeavour Energy during the detailed design phase, a noise impact assessment can be carried out accordingly.
Site Remediation *Endeavour Energy has noted that the Report on Supplementary Contamination Assessment and Remediation Action Plan do not appear to identify the electricity infrastructure on or in vicinity of the site which is likely to become redundant assets as a result of the proposed development as potential areas of environmental concern (AEC) and associated contaminants of potential concern (COPC).* *Endeavour Energy's Environmental Business Partner Team have advised that the remediation of soils or surfaces impacted by various forms of electricity infrastructure is not uncommon but is usually not significant eg. transformer oil associated with leaking substations, pole treatment chemicals at the base of timber poles etc. The method of remediation is generally the removal of the electricity infrastructure, removal of any stained surfaces or excavation of any contaminated soils and their disposal at a licensed land fill. The decommissioning and removal of the redundant electricity infrastructure will be dealt with by Endeavour Energy's Network Connections Branch as part of the application for the connection of load for the new development – please refer to the above point 'Network Capacity / Connection'.*	This item is acknowledged, and it is anticipated this will be addressed as a condition of consent. Douglas Partners who are the contamination consultant for the project were not provided with any exact plans of electrical infrastructure on site nor which assets would be made redundant and removed and so these matters have not been specifically referenced in their reporting. However, Douglas Partners have clarified that any exposed soil be suspected to be impacted by contamination (e.g. staining, odours or otherwise), these finds can be addressed under the unexpected finds protocol detailed in the Remediation Action Plan (Appendix P of the EIS) if and when this occurs. Furthermore, any soils required off-site disposal will require a formal waste classification as indicated by the RAP and any contamination identified within this process can be dealt with by those procedures Note: the supplementary Contamination Assessment and RAP do not address contamination beyond the boundaries of the defined site.
Environment Protection Authority	
Noise and Vibration *The EPA reviewed the SSD Application Acoustic Assessment, Rev 3, dated 30 April 2021, prepared by Aurecon and is generally satisfied with the assessment. However, the EPA makes the following comments:*	A response to each item is provided below.

1. The report adequately identifies noise sources associated with the development and uses appropriate assessment criteria for those noise sources. However, it is noted that that the assessment of mechanical plant indicates that significant noise mitigation is required due to the proximity of the boundary. The EPA advises that the feasibility of such a mitigation option identified in the report should be assessed prior to commencing the design of the mechanical plant.	Four AC compressors units (identified on architectural drawings) will be fitted with noise-suppressing devices (absorptive insultation and enclosures). A review of all building services plant/equipment will be undertaken during subsequent stages of the project design and once plant selections and locations are finalized, to determine the suitable acoustic treatments. Refer to a detailed response to this item provided by Aurecon at **Attachment H**. Notwithstanding, is anticipated this will be addressed as a condition of consent.
2. The Acoustic Assessment has identified that there will be a number of receivers that are significantly above the "noise affected" (construction) noise management level as outlined in the Interim Construction Noise Guideline (DECC, 2009). As such, they have listed a considerable number of mitigation measures deemed to be feasible and reasonable in order to reduce the construction noise impact at the nearest receiver locations. Whilst it is important to identify these measures and develop management plans, they will need to be implemented. The EPA would encourage actions to ensure that mitigation measures are applied throughout the construction period.	This item is acknowledged, and it is anticipated this will be addressed as a condition of consent.
<u>Contaminated Land</u> *The EPA reviewed:* - *Report on Supplementary Contamination Assessment, Rev 2, dated 4 May 2021, prepared by Douglas Partners (Appendix S) – that consisted of a review of the 2020 Preliminary Site Investigation by Douglas Partners and additional intrusive soil investigations; and* - *Remediation Action Plan, Rev 2, dated 4 May 2021, prepared by Douglas Partners (RAP) (Appendix P).* *Both the Supplementary Contamination Assessment and the RAP noted the presence of friable asbestos and asbestos fines (FA/AF) within fill in the northern portion of the site. Both reports noted the presence of brick, tile, concrete and glass material indicating that demolition waste was used as fill and as such, there is a high likelihood of further asbestos in the fill.*	Noted
Additional investigations are recommended once the site is demarcated, fenced off and appropriate controls are in place. Waste classification should be confirmed by a qualified environmental consultant ex situ during bulk excavation to ensure appropriate disposal. Further to this, additional investigations should be undertaken to confirm the presence or absence of FA/AF in the topsoil, as an additional safety measure for the existing site users.	Prior to commencement of works, the applicant is to undergo additional investigations to confirm the presence or absence of FA/AF in the topsoil and take appropriate action to ensure the safety of site users is maintained.

The RAP also recommended a HAZMAT survey of the buildings present on site by a licenced occupational hygienist prior to demolition, and off-site disposal of contaminated soils; that an unexpected finds protocol is prepared; and that a Validation Report will need to be prepared following completion of remediation works.	A HAZMAT survey of the buildings present on the site will be completed by a licensed occupational hygienist prior to works commencing.
Given the presence of contaminants of concern, the EPA recommends the applicant engages an EPA-accredited site auditor throughout the duration of works to ensure that any work required in relation to contamination is appropriately managed. The site auditor will independently review the consultant's activities to ensure the work complies with current regulations and guidelines and meets the standard appropriate for the proposed land use.	The applicant will engage an EPA-accredited site auditor throughout the duration of works to ensure that any work required in relation to contamination is appropriately managed. The site auditor will independently review the activities to ensure the work complies with current regulations and guidelines and meets the standard appropriate for the proposed land use.
It is imperative that a site auditor is engaged as early in the site assessment and remediation process as possible. Early communication between the landowner or developer, consultant and site auditor improves the efficiency of the audit process by ensuring all environmental issues have been addressed to the satisfaction of the auditor, in an appropriate manner and in accordance with guidelines made or approved by the EPA.	This item is acknowledged, and it is anticipated this will be addressed as a condition of consent. A site auditor will be engaged prior to commencement of works.
The following conditions are recommended to ensure site remediation is appropriately managed: *1. The Applicant must engage an NSW EPA-accredited Site Auditor throughout the duration of works to ensure that any work required in relation to soil or groundwater contamination is appropriately managed.* *2. Prior to commencing with the remediation, the Applicant must submit to the Certifier, an Interim Audit Advice from the Site Auditor that advises that the site can be made suitable for the proposed use subject to the implementation of the Remedial Action Plan and that the Remedial Action Plan is appropriate. A copy should also be provided to the Planning Secretary.* *3. The applicant must adhere to the management measures in the Remedial Action Plan as approved by the Site Auditor.* *4. Any variations to the approved Remedial Action Plan must be approved in writing by the Site Auditor.* *5. If work is to be completed in stages, the Site Auditor must confirm satisfactory completion of each stage by the issuance of Interim Audit Advice/s.*	This item is acknowledged, and it is anticipated these will be addressed as conditions on the development consent.

6. The Applicant must obtain a Section A1 Site Audit Statement – or a Section A2 Site Audit Statement accompanied by an Environmental Management Plan – from the accredited Site Auditor and submit it to the consent authority prior to commencement of operation. The Site Audit Statement must certify the site is suitable for the proposed use. *7. Prior to operation, the applicant must obtain confirmation from the Certifying Authority in writing that the requirement of condition 6 has been met.*	
Waste *The EPA notes the inclusion of Construction and Operational Waste Management Plans and reminds the applicant of the following:* *All asbestos waste loads over 100 kilograms or 10 square metres removed from the site must be tracked using the EPA's online "Waste Locate" system, according to the requirements of the Protection of the Environment Operations (Waste) Regulation 2014. Further details on these requirements can be found on the EPA's website at: https://www.epa.nsw.gov.au/yourenvironment/waste/transporting-asbestos-waste-tyres/tracking-asbestos-waste-locate* *The applicant must not cause, permit or allow any waste generated outside the site to be received at the site for storage, treatment, processing, reprocessing, or disposal, except Virgin Excavated Natural Material as defined by the Waste Classification Guidelines issued by the EPA that are current at that time, unless expressly permitted by planning legislation and/or approvals and/or consents relevant to the site.* *Processing of fill material containing asbestos is prohibited. Any loads of waste from the works that are rejected from a waste facility due to the presence of asbestos must not be reprocessed but transported to a facility that can lawfully receive asbestos waste.* *It is the EPA's expectation that effective oversight of contractors, sub-contractors and agents is maintained in relation to the lawful disposal of waste from the site.*	This item is acknowledged, and it is anticipated these will be addressed as conditions on the development consent. The applicant will have to develop a Construction and Demolition Waste Management Plan prior to commencement of works that details: • the quantities of each waste type generated during construction and the proposed reuse, recycling and disposal locations; and • removal of hazardous materials, particularly the method of containment and control of emission of fibres to the air, and disposal at an approved waste disposal facility in accordance with the requirements of the relevant legislation, codes, standards and guidelines, prior to the commencement of any building works. The applicant will be required to prepare an Operational Waste Management Plan prior to commencement of operation that details: • the type and quantity of waste to be generated during operation of the development; • describe the handling, storage and disposal of all waste streams generated on site, consistent with the Protection of the Environment Operations Act 1997, Protection of the Environment Operations (Waste) Regulation 2014 and the Waste Classification Guideline (Department of Environment, Climate Change and Water, 2009); and • details the materials to be reused or recycled, either on or off site.
Heritage NSW - Aboriginal Cultural Heritage	

Much of the proposal area has been heavily modified with variable depths of fill material (0.2- 2.3 m). The Remediation Action Plan found that several areas contained modern fill (i.e. asbestos, cement, brick, and tile), and a red-brown and brown silty clay which is possibly natural clay that has been reworked during prior leveling of the site. Therefore, there is low potential that ex situ Aboriginal Objects are present in this reworked material. The ACHAR outlines that owing to the location of the project area and the disturbed nature of the sediment that an Unexpected Finds Protocol will suffice.	Noted
Consultation with Registered Aboriginal Parties (RAPs) has met Heritage NSW guidelines, with no issues raised during this process. Six responses were received from the RAPs, five providing support for the project with no additional comments. One response, while supporting the ACHAR, recommends that test excavations occur and an Aboriginal Interpretation process be put in place. In response, Tocomwall outlined that the development area has been heavily disturbed with low to nil potential for Aboriginal Objects to be present and that test excavations would not be required. Tocomwall will be undertaking further consultation regarding a strategy for Connection to Country. The RAP accepted that response provided by Tocomwall (ACHAR Appendix 3).	ThiNoted
Heritage NSW agrees with the ACHAR outcomes, though recommends that while the predictive model presented in Section 6 of the ACHAR is sufficient for this project, for future assessments Tocomwall should critique other predictive models rather provide a generalised overview as presented here.	Noted
Heritage NSW Recommended Conditions:	A response to recommended conditions is provided below.
That material be produced ensuring workers on site receive suitable heritage inductions prior to carrying out any development on site and;	There are no heritage items on the site and it is not anticipated than any archaeological finds will be uncovered during works, however the preliminary Construction Management Plan (Attachment G) notes that workers on site will receive suitable heritage inductions prior to carrying out any development including a briefing on the unexpected finds protocol for the site.
that a detailed Unexpected Finds Protocol be produced for the Project Manager.	As above
Sydney Water	
Water Servicing *- Potable water servicing should be available via a 150mm CICL watermain (laid in 1961) on Binalong Road.* *- Amplifications, adjustments, and/or minor extensions may be required.*	This item is acknowledged, and it is anticipated that the appointed contractor will inspect and verify pipework condition. If required, the contractor to excavate and relay new pipework or if suitable, realign using suitable internal reinforced membrane. Prior to occupation of the building, the Applicant must obtain a Compliance Certificate for water and sewerage infrastructure servicing of the site under section 73 of the Sydney Water Act 1994.

Wastewater Servicing *- Wastewater servicing should be available via 150mm VC wastewater mains (laid in 1965 and 1969) within the property boundary.* *- Amplifications, adjustments, and/or minor extensions may be required.*	This item is acknowledged, and it is anticipated that the appointed contractor will inspect and verify pipework condition. If required, the contractor to excavate and relay new pipework or if suitable, realign using suitable internal reinforced membrane. Prior to occupation of the building, the Applicant must obtain a Compliance Certificate for water and sewerage infrastructure servicing of the site under section 73 of the Sydney Water Act 1994.
Transport for NSW	
<u>Green Travel Plan (GTP)</u> *Prior to occupancy, the proponent provide a GTP for TfNSW's consideration that:* - *Considers the motivations and habits of the students that affect their travel by surveying students, parent and staff (with possibly follow up interviews) about what would motivate and facilitate them to swap to active or public transport.* - *Quantifies (both formal and informal) bicycle parking use and examines the site for cycling permeability and connectivity to local bicycle network (including kerb ramps)* - *Quantifies how many lockers and other end of trip (EoT) facilities are available* - *Includes a completed Transport Access Guide (TAG) which builds on the example TAG by* - *Mapping the location and accessibility of the bike racks and EoT facilities* - *Mapping recommended cycling routes and walking routes from within the school catchment, including from Pendle Hill Station (appreciating that cycle routes for students under 16 will differ from older students)* - *Includes a comprehensive communications strategy with assignment of responsibility for each action* - *Focuses on the needs of staff and students and the context of the school by including innovative initiatives:* - *Gamification for students using active and public transport – with attempts to try and get the most days/trips/km in a given time period* - *Activities for students to create and share transport* - *Consider more frequent active transport events – monthly or month long events to create more of a continual reinforcement of the possibilities of active and public transport.*	This item is acknowledged, and it is anticipated this will be addressed as a condition of consent. It is recommended that the conditions of consent reflect the latest changes in documentation and terminology, which will require a School Transport Plan (rather than a Green Travel Plan) to be prepared. As discussed with TfNSW during a post-EIS consultation session, the initiatives listed here are examples only and may not be included in a final School Transport Plan. An example condition: *Prior to the commencement of operation, a School Transport Plan (STP), must be prepared and be submitted to the Secretary to promote the use of active and sustainable transport modes. The plan must:* *a) Be prepared by a suitably qualified traffic consultant in consultation with City of Parramatta Council and Transport for NSW;* *b) Include objectives and mode share targets (i.e. Site and land use specific, measurable and achievable and timeframes for implementation) to define the direction and purpose of the STP;* *c) Include specific tools and actions to help achieve the objectives and mode share targets;* *d) Include measures to promote and support the implementation of the plan, including financial and human resource requirements, roles and responsibilities for relevant employees involved in the implementation of the STP; and* e) *Include details regarding the methodology and monitoring/review program to measure the effectiveness of the objectives and mode share targets of the STP, including the frequency of monitoring and the requirement for travel surveys to identify travel behaviours of students and staff to and from both schools at appropriate times throughout the academic year.*

- *Consider good quality subsidised panniers for staff and students to improve the experiences of riding to school and ability to carry required equipment, particularly on hot days.* - *E-bike fleet that staff could borrow to trial their trip home.* - *> Staff to champion good practice for students and share their active and public travel experiences*	
<u>Bus Planning</u> *The development application will result in an increase in the school's enrolment, which will increase the travel demand for bus services from 2023. In this regard, TfNSW notes the following:* – *The proponent will need to engage with TfNSW regarding the future bus services demand. It is requested that the proponent provides TfNSW with future enrolment information when the information is made available to assist in preparing for future bus service provisions to support the demand of the site; and* – *TfNSW will require a minimum of twelve month notice to secure funding and fleet to support any bus service change.*	Noted. Following further consultation with TfNSW during a post-EIS consultation session, agreement was that relevant enrolment data will be provided post approval. TfNSW are consulted regularly on the project and will continue to be through the Parramatta Transport Working Group.