



Submissions Report

State Significant Development (SSD-35715221)
Concept Masterplan and Stage I Works at William Clarke College
10 Morris Grove, Kellyville

Printed: 28 June 2023
File Name: 20283D William Clarke College - Masterplan/Reports/20283D.SubmissionsReport
Project Manager: K.Mackay
Client: William Clarke College
Project Number: 20283D

Document Control

Version	Prepared By	Reviewed By	Issued To	Date
Rev_1, Draft	K.Mackay	D.Kettle	Client, Architect	28 March 2023
Rev_2, Final	K.Mackay	D.Kettle	Client, Architect, DPE	13 April 2023
Rev_3, Draft	K.Mackay	D.Kettle	Client, Architect,	26 June 2023
Rev_4, Draft	K.Mackay	D.Kettle	Client, Architect,	28 June 2023

Contents

Executive Summary	v
1 Introduction	1
1.1 Purpose of this Report	1
1.2 Material Relied Upon	1
2 Analysis of Submissions	2
2.1 Introduction	2
2.2 Breakdown of Submissions	2
2.3 Categorisation of Issues Raised in Submissions	2
3 Actions Taken Since Exhibition	5
3.1 Introduction	5
3.2 Meetings	5
3.3 Traffic and Car Parking	5
3.4 Flooding	5
3.5 Contamination and Remediation	5
3.6 Built Form and Amenity	5
3.7 Noise	6
3.8 Community Use of School Facilities	6
3.9 Waste Management	6
3.10 Aboriginal Cultural Heritage	6
3.11 Social Impact	6
3.12 Clarification on Student Numbers	6
4 Response to Submissions	8
4.1 Introduction	8
4.2 Traffic and Car Parking	8
4.3 School Travel Plan	13
4.4 Flooding	14
4.5 Stormwater	16
4.6 Contamination and Remediation	17
4.7 Groundwater	18
4.8 Water Infrastructure	18
4.9 Energy Infrastructure	19
4.10 Built Form and Amenity	21
4.11 Noise	23
4.12 Community Use of School Facilities	24
4.13 Waste Management	26
4.14 Infrastructure Contributions	26

Contents

4.15	Aboriginal Cultural Heritage	26
4.16	Social Impact	27
5	Updated Project Justification	28
5.1	Introduction	28
5.2	Summary of Assessment of Potential Impacts	28
5.3	Mitigation of Impacts	29
5.4	Consistency with Strategic Context	29
5.5	Compliance with Statutory Context	29
5.6	Consultation	30
5.7	Compliance Monitoring	30
5.8	Impact Assessment Uncertainties and Resolution	30
6	References	31

Tables

Table 1	Proposed Student Numbers (updated May 2023)	7
Table 2	Summary of Responses relating to Traffic and Car Parking	8
Table 3	Summary of Responses relating to School Travel Plan	13
Table 4	Summary of Responses relating to Flooding	14
Table 5	Summary of Responses relating to Stormwater	16
Table 6	Summary of Responses relating to Contamination and Remediation	17
Table 7	Summary of Responses relating to Groundwater	18
Table 8	Summary of Responses relating to Water Infrastructure	18
Table 9	Summary of Responses relating to Energy Infrastructure	20
Table 10	Summary of Responses relating to Built Form and Amenity	21
Table 11	Summary of Responses relating to Noise	23
Table 12	Additional Information relating to Community Use of School Facilities	25
Table 13	Summary of Responses relating to Social Impact	27

Contents

Attachments

- A. Submissions Register (*DFP Planning*)
- B. Amended Mitigation Measures (*DFP Planning*)
- C. Amended Traffic Impact Assessment (*PTC*)
- D. Amended School Travel Plan (*PTC*)
- E. Operational Traffic and Access Management Plan (*PTC*)
- F. Flood Risk Assessment & Emergency Management Plan (*WMS*)
- G. Stormwater Response to Submissions (*Birzulis*)
- H. Preliminary Site Investigation – Concept Plan and Stage 1 (*EI Australia*)
- I. Groundwater Response to Submissions (*JK Geotechnics*)
- J. Architectural Response to Submissions (*PMDL*)
- K. Shadow Diagrams – Concept Plan (*PMDL*)
- L. Shadow Diagrams – Stage 1 (*PMDL*)
- M. Amended and Additional Drawings (*PMDL*)
- N. Noise and Vibration Impact Assessment – Concept Plan (*SLR Consulting*)
- O. Amended Noise and Vibration Impact Assessment – Stage 1 (*SLR Consulting*)
- P. Waste Letter (*Elephants Foot Consulting*)
- Q. Aboriginal Archaeological Cultural Heritage Assessment (*Tocomwall*)
- R. Social Impact Response to Submissions (*Sarah George Consulting*)
- S. Amended Social Impact Assessment (*Sarah George Consulting*)

Abbreviations

AS	Australian Standard
BCA	Building Code of Australia
CC	construction certificate
CIV	capital investment value
Council	The Hills Shire Council
DA	development application
DCP	development control plan
DFP	DFP Planning Pty Limited
DPE	NSW Department of Planning and Environment
EP&A Act	Environmental Planning and Assessment Act 1979
EP&A Regulation	Environmental Planning and Assessment Regulation 2021
EPI	environmental planning instrument
FPL	flood planning level
LEP	local environmental plan
LGA	local government area
PSI	preliminary site investigation
RL	reduced level
SEE	Statement of Environmental Effects
SEPP	state environmental planning policy

Executive Summary

William Clarke College has developed a Masterplan vision for its school campus at 10 Morris Grove, Kellyville to provide its students and school community with high-quality educational outcomes and a great learning experience, now and in the future.

The College opened its doors to students in 1988 and as of 2022, had an enrolment of 1,907 students. Existing development consents do not impose any limit on the number of students that can be accommodated at the site and in 2023, the enrolment has grown to 1946 students. It is forecast that the student enrolment will increase to 2,050 students by 2026.

The College is seeking to replace end-of-life buildings with modern learning centres to meet educational needs for the future generation and where possible, improve the environmental sustainability of the College campus.

The Masterplan includes the proposed new “Bryson Building” to be constructed in the heart of the campus as part of Stage 1 construction works, along with reconfiguring existing car parking areas to be more efficient and improve the drop-off and pick-up operations. These car parking improvements provide an opportunity to relocate the existing waste and recycling compound which will benefit the College and surrounding residents and road users.

Future stages include a new Performing Arts Centre to replace the existing Performing Arts Hall, a new Tech Workshop Building and an extension to the existing Sports Centre building.

As the works have a capital investment value exceeding \$50 million, the project is deemed to be State Significant Development under *State Environmental Planning Policy (Planning Systems) 2021*.

The State Significant Development Application was notified between 8 November 2022 and 5 December 2022 in accordance with the requirements of the *Environmental Planning and Assessment Act 1979* (EP&A Act) and *Environmental Planning and Assessment Regulation 2021* (EP&A Regulation).

A total of 14 unique submissions were received comprising nine (9) letters of agency advice, a submission from The Hills Shire Council and four (4) submissions from individuals.

The proposed design for the school campus is a result of analysis of the site, consideration for the needs of the catchment, extensive option testing, revision and consultation. Agency advice and submissions received have not warranted any significant design changes although additional mitigation measures relating to visitor bicycle parking, maximum noise levels for future buildings and protection of Sydney Water Assets are proposed.

Additional information, explanation and justification have been provided in response to matters raised during exhibition, including those associated with traffic and parking, flooding and stormwater, contamination, groundwater, utility infrastructure, building height and amenity, noise impacts, community use of school facilities, and social impacts.

Agency advice and submissions pertaining to traffic and parking have been addressed by the project’s traffic consultant, PTC by way of additional explanation and justification for the proposed sustainable travel shift which will target all existing and future students and staff and through additional future scenario modelling and analysis of pickup and drop-off arrangements. An amended School Travel Plan and an Operational Traffic and Access Management Plan have also been prepared.

A flood impact assessment has been undertaken which has determined that the site is not subject to flood risk from mainstream sources and that the Concept and Stage 1 proposed works would not be subject to flood risk from overland flow. Even so, flood evacuation protocols have been included in the Emergency Management Plan for the site.

Additional contamination investigations have been undertaken for all areas of the site affected by the proposed masterplan works and have determined that the likelihood of contamination is low and that the site is suitable for the ongoing educational land use.

It has been determined that the limited excavation works proposed will not have additional impacts on groundwater that would require further assessment or licensing.

Executive Summary

Council and agency advice regarding stormwater and utility infrastructure is noted and mitigation measures are proposed in these regards.

Additional justification has been provided for the proposed height of buildings noting that the proposed buildings will sit comfortably within a setting of existing educational buildings that already exceed the height control under the LEP. In addition, the project architect has provided further details demonstrating the natural ventilation through, and daylight penetration into, the proposed Stage 1 Bryson Building and identified existing and new end-of-trip facilities.

Further assessment of the potential noise and vibration impacts of all proposed buildings and uses of the site has been undertaken wherein it is concluded that the levels of impact are acceptable given the minor changes to the existing approved arrangements and the infrequency of impact.

This Submissions Report includes a more detailed explanation of the shared use of the school facilities by community groups and organisations noting that there is no change to these existing arrangements proposed under the Concept Plan or Stage 1 – i.e. there are no additional impacts compared to the existing approved situation.

The Social Impact Assessment for the proposal has also been amended to quantify the potential impacts and outline the mitigation measures to manage these impacts to acceptable levels.

1 Introduction

1.1 Purpose of this Report

DFP Planning Pty Ltd (DFP) has been commissioned by William Clarke College (the College) (ABN: 83 169 319 110) to assist in the planning and design of a concept development application (DA) to be assessed by the NSW Department of Planning and Environment (DPE).

The proposed concept DA comprises a new Masterplan for the College site comprising a new Performing Arts Centre, additions to Sports Facilities and Stage 1 works including a new classroom building (the Bryson Building), amendments to internal vehicle circulation and a carpark, relocation of waste facilities and landscaping works.

DFP prepared an Environmental Impact Statement (EIS) report which accompanied a State Significant Development Application which was lodged with DPE on 3 November 2022.

Subsequently, the DPE publicly exhibited the DA between 8 November 2022 and 5 December 2022. During that time, 14 submissions were received by DPE including nine (9) submissions from the various NSW Government agencies (including DPE), a submission from The Hills Shire Council and four (4) submissions from individuals.

This Submissions Report has been prepared in accordance with Part 4 of the *Environmental Planning and Assessment Act 1979* (EP&A Act) and Part 8 of the *Environmental Planning and Assessment Regulation 2021* (EP&A Regulation) to analyse the submissions received and to provide a response to those submissions including, where relevant, provision of additional or amended supporting material to enable the DPE to finalise their assessment of the proposed development and for the Minister (or delegate) to determine the DA in accordance with Section 4.38 of the EP&A Act.

1.2 Material Relied Upon

This Submissions Report has been prepared by DFP based on the EIS lodged with the DA and additional or amended information listed in the **References** at **Section 6**.

2 Analysis of Submissions

2.1 Introduction

This section of the report provides an analysis of the submissions received during the public exhibition of the application including the groups and people that made submissions and a categorisation of the key issues raised in those submissions.

2.2 Breakdown of Submissions

DPE publicly exhibited the DA between 8 November 2022 and 5 December 2022 and during that time, 14 submissions were received by DPE including nine (9) submissions from the various NSW Government agencies, a submission from The Hills Shire Council and four (4) public submissions from individuals. **Appendix A** to this Submissions Report is a Register of Submissions.

The public authorities that made submissions included:

- NSW DPE – Social and Infrastructure Assessments Team (DPE);
- NSW DPE - Environment and Heritage Group (EHG);
- NSW DPE – Water (DPE Water);
- Heritage NSW;
- Transport for NSW (TfNSW);
- Water NSW;
- NSW State Emergency Services (SES);
- Sydney Water;
- Endeavour Energy; and
- The Hills Shire Council

None of these submissions objected to the proposal although some requested additional information and/or assessment.

Of the four (4) public submissions:

- Two (2) objected to the proposal on the grounds of traffic impacts; and
- Two (2) were not against the proposal but asked that further consideration be given to traffic, parking and building form concerns.

Of the public submissions, three appear to be of residents of Wrights Road or nearby and one appears to be from an individual residing in Huntingwood.

2.3 Categorisation of Issues Raised in Submissions

The government agency, authority and individuals submissions raised a number of matters which are broadly outlined in the following subsections. **Section 4** of this report includes a detailed response to these issues.

2.3.1 Traffic and Car Parking

DPE requested additional information regarding the assumptions within the traffic assessment relating to a net zero increase in traffic generation including the targeted modal shift and ability of existing public transport infrastructure to cater for the increase in students. Additional detail regarding drop-off and pick-up arrangements was requested, including any additional management or mitigation measures that are proposed. DPE also requested further assessment relating to out of standard school hours uses of the site and that the Stage 1 works and Concept Plan be separately assessed.

2 Analysis of Submissions

Council queried whether an access from Green Road to Morris Grove should be provided and raised concerns relating to potential queuing of vehicles using the reconfigured Primary School carpark on Wrights Road and potential impacts to nearby intersections.

2.3.2 School Travel Plan (STP)

DPE requested additional information and details to be included within the STP relating to, amongst other things, the incremental increase in student numbers, the proposed modal shift targets, the timeframe within which the targets are to be achieved, end of trip facilities and the roles and responsibilities of people tasked with implementing the plan.

2.3.3 Flooding

DPE required that a suitably qualified person undertake the flood assessment and that the assessment separately address the Stage 1 works and the Concept Plan be undertaken. In addition DPE requested a detailed evacuation response plan.

EHG requested a detailed flood impact risk assessment and evacuation response plan.

2.3.4 Stormwater

Council listed numerous requirements relating to the design and management of stormwater, many of which are standard requirements and typically subject to conditions of consent. Notwithstanding, responses against each item are provided in this Response to Submissions Report.

2.3.5 Groundwater

DPE Water requested additional information regarding the likely impacts of the proposed construction and operations on groundwater.

2.3.6 Contamination and Remediation

DPE noted that the contamination assessment was limited to the Stage 1 works and requested that an assessment of all areas subject to the Concept Plan be undertaken.

2.3.7 Water Infrastructure

Sydney Water noted that regard should be had to capacity of infrastructure to cater for the proposal and indicated that new tree planting and landscaping should have regard to potential impacts on Sydney Water Assets.

2.3.8 Energy Infrastructure

Energy Australia had no objection to the proposal but provided numerous advisory notes and conditions that should be imposed on any development consent.

2.3.9 Built Form and Amenity

Council and two public submissions noted the height of the proposed Bryson Building and questioned whether it was appropriate in the context of the site.

In addition, DPE asked for more information on cross ventilation, natural light penetration and shadow impacts of the Bryson Building as well as further details regarding the existing and proposed end-of-trip facilities.

2.3.10 Noise

DPE requested that the Noise and Vibration Impact Assessment clearly indicate the assessment of the Concept Works separately to the Stage 1 works.

In addition, DPE requested additional noise impact assessment relating to future buildings envisaged under the Concept Plan.

2.3.11 Community Use of School Facilities

DPE requested additional details about the community uses of the school premises including details about access and security arrangements.

2 Analysis of Submissions

2.3.12 Waste Management

DPE requested that the Operational Waste Management Plan clearly indicate the assessment of the Concept Plan works separately to the Stage 1 works.

2.3.13 Infrastructure Contributions

Council noted that The Hills s7.12 Contributions Plan should be applied to the proposed development.

2.3.14 Aboriginal Cultural Heritage

DPE requested that the Aboriginal Archaeological Impact Assessment clearly indicate the assessment of the Concept works separately to the Stage 1 works.

2.3.15 Social Impact

DPE requested that the Social Impact Assessment clearly indicate the assessment of the Concept works separately to the Stage 1 works and that the level of impacts be more accurately described.

3 Actions Taken Since Exhibition

3.1 Introduction

This section summarises the actions taken by the Applicant and project team since the public exhibition, with a view to addressing certain issues raised in submissions and agency advice.

3.2 Meetings

On 1 February 2023, representatives of the College, DFP, PMDL and PTC met with DPE Officers to discuss the traffic and parking related aspects of the proposal and the DPE's request for further assessment/information.

On 28 February 2023, representatives of the College and DFP met with DPE Officers at the site at which time DPE Officers undertook a detailed site inspection and observed the afternoon drop-off and pick-up operations.

3.3 Traffic and Car Parking

In response to submissions and request for information from DPE, PTC has:

- undertaken additional analysis of the reconfigured Primary School carpark on Wrights Road and potential impacts to nearby intersections in the amended Traffic Impact Assessment report (**Attachment C**). The results of this analysis are described in **Section 4.2**, where it is determined that the impacts are acceptable;
- prepared additional detail and justification relating to the proposed sustainable travel methodology in the amended Traffic Impact Assessment report (**Attachment C**);
- undertaken additional SIDRA modelling in the amended Traffic Impact Assessment report (**Attachment C**);
- updated the STP (**Attachment D**); and
- prepared an Operation Traffic and Access Management Plan (OTAMP) (**Attachment E**).

3.4 Flooding

The Proponent engaged WMS, qualified in flood engineering, to undertake a flood impact risk assessment and emergency response plan (**Attachment F**) for the proposed development. The results of that assessment are discussed at **Section 4.4**, where it is concluded that the site is not subject to flood risk from mainstream sources and that the Concept and Stage 1 proposed works would not be subject to flood risk from overland flow.

3.5 Contamination and Remediation

A Preliminary Site Investigation (PSI) has now been undertaken for all areas of the site subject to the Concept Plan (including the Stage 1 works areas) and this supplements the Detailed Site Investigation (DSI) that had already been undertaken for Stage 1.

The PSI (**Attachment H**) is discussed in **Section 4.6**, addresses both the Concept Plan and the Stage 1 Works, and concludes that all parts of the site are suitable for the continuing educational land use and that no further detailed investigations are required.

3.6 Built Form and Amenity

PMDL has prepared additional drawings and information relating to cross ventilation, natural light penetration and shadow impacts of the Bryson Building and also greater details regarding the existing and proposed end-of-trip facilities (see **Attachments J, K, L and M** and **Section 4.10**).

3 Actions Taken Since Exhibition

3.7 Noise

SLR has prepared an assessment of the acoustic and vibration impacts of the Concept works including consideration of the worst case scenario of out of school hours usage of the site (see **Attachment N**).

In addition, SLR has amended the Noise and Vibration Impact Assessment (**Attachment O**) that was lodged with the EIS so that it only assesses the Stage 1 works.

These assessments are discussed in **Section 4.11** of this report and demonstrate that the proposed Concept works and Stage 1 works are considered to have acceptable noise and vibration impacts.

3.8 Community Use of School Facilities

The College has provided DFP with additional details about the community uses of the school premises including details about access and security arrangements and these are provided for the DPE's information at **Section 4.12** of this report.

3.9 Waste Management

An addendum Waste letter has been prepared (**Attachment N**) to address the Concept works and the Stage 1 works.

3.10 Aboriginal Cultural Heritage

The Aboriginal Archaeological Cultural Heritage Assessment report has been amended (**Attachment Q**) to more specifically address the Concept works and the Stage 1 works, noting that the areas of impact under the Concept Plan include the Stage 1 Works and hence, the assessment is the same for both.

3.11 Social Impact

The Social Impact Assessment has been updated to include the required declaration and to assess the Concept works separately to the Stage 1 works (**Attachment S**).

In addition, a response to the submissions has been prepared by Sarah George Consulting to address the social impacts arising from the additional investigations outlined above (**Attachment R**).

3.12 Clarification on Student Numbers

In response to questions raised by DPE Officers, the Applicant and consultant team has reviewed the proposed student numbers and it has become apparent that the proposed future total of 2,100 students double counted students currently enrolled in one of 2-day or 3-day Prep courses which do not overlap and hence the total number of students on campus on any one day should have been 2,050 students.

In addition, the College has indicated that demand for any additional Prep classes is low and accordingly, it is proposed to amend the proposal such that there will be no change to the existing Prep operations on-site.

Table 1 below provides updated details regarding the proposed future student numbers.

This shows that from the base year of 2022 to 2030, there will be an increase of 76 primary school students and 78 secondary school students.

It is noted that, other than the Traffic Impact Assessment and School Travel Plan, the original specialist consultant reports continue to refer to a maximum of 2,100 students and have not been amended as the assessments within those documents demonstrated that the impacts of the proposal were acceptable and reducing the total numbers to 2,050 due to an inadvertent double-counting will not result in any greater impact than already assessed.

3 Actions Taken Since Exhibition

Table 1 Proposed Student Numbers (updated May 2023)

Year	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030
Prep (max)	50	50	50	50	50	50	50	50	50	50
K	95	104	104	104	108	108	108	108	104	108
1	95	104	104	104	104	108	108	108	108	108
2	72	104	104	104	104	104	108	108	108	108
3	76	78	104	104	104	104	104	108	108	108
4	76	78	78	104	104	104	104	104	108	108
5	103	104	104	104	104	104	104	104	104	108
6	105	104	104	104	104	104	104	104	104	104
7	232	208	208	216	208	208	208	208	208	208
8	207	234	208	208	216	208	208	208	208	208
9	188	182	234	208	208	216	208	208	208	208
10	187	182	182	234	208	208	216	208	208	208
11	172	182	182	182	234	200	208	216	208	208
12	162	182	182	182	182	224	208	208	216	208
Total	1820	1896	1948	2008	2038	2050	2046	2050	2050	2050
Prep	50	50	50	50	50	50	50	50	50	50
Primary	622	676	702	728	732	736	740	744	744	752
Secondary	1148	1170	1196	1230	1256	1264	1256	1256	1256	1248

4 Response to Submissions

4.1 Introduction

The following subsections provide a detailed response to the issues raised in the agency advices and public submissions received during the exhibition of the development application and is structured to respond to the categorised issues identified in **Section 2.3** of this report.

4.2 Traffic and Car Parking

Table 2 provides a summary response to the traffic and parking issues raised in submissions and should be read in conjunction with the detailed responses provided in the Amended TIA prepared by PTC (see **Attachment C**).

Ref.	Summary of Submission	Response	Reference
1.1	<p>• The TIA states that 'no increase in vehicular movement is expected, no traffic modelling for the future scenario is seen as required'. The Department does not agree with this statement and considers that this statement is non-compliant with the requirements of the Secretary's Environmental Assessment Requirements (SEARs) (which requires assessment of worst case scenario) plus ignores the background growth in traffic over the next 10-years.</p> <p>In this regard, the Department notes that the application relies on the sustainable transport/public transport in concluding that the no additional traffic would be generated by the proposed 200 student increase out of which 76 would be primary school students. However, the Department has concerns that this scenario along with the proposed modal shift targets would not be achievable give that the school site is not located in a very accessible location with public transport (trains, metro etc), unlike some of the inner Sydney schools. Additionally, there are no public transport infrastructure upgrades proposed in the near vicinity of the school that would assist with students travelling via sustainable modes of transport. The EIS or the appendices do not provide any details of the school bus services that are proposed to cater for new students.</p> <p>The modal split itself targets private vehicle usage of about 50% of the final number of students. No traffic impacts have been assessed based on the 50% students that would rely on private vehicles in the future. As such, no timeline of attaining this target modal split has also been provided (discussed in detail later).</p> <p>Given this is an independent school, the catchment is not restricted to a certain walking distance and students from any suburb of Sydney can travel to this school. Noting this, the Department is unclear regarding the basis of the conclusion that all additional students (including kindergarten students) would use public transport or walk/cycle to school.</p>	<p>Notwithstanding that the SEARs does not specify any specific requirements relating to background traffic growth over any time period, PTC has undertaken additional SIDRA modelling which is outlined in the Amended Traffic Impact Assessment (TIA) report at Attachment C. This modelling includes the Existing Base case, 2026 Base case with no increase to students or changes to access arrangements but with 2% background growth and a 2026 Development case (by which time the proposal would reach peak student capacity).</p> <p>The Amended TIA also provides further justification for the proposed mode share targets noting that there is currently no cap on student or staff numbers applicable to this school and the school could naturally increase enrolments and staff without the need for development consent. The key reason for the proposal is to provide 21st century educational facilities and retire older classrooms.</p> <p>The amended TIA explains that if the existing travel modes were to continue, the proposal might involve an additional 82 students being driven or driving to the school (in 55 cars). However, all students and staff will be targeted to achieve the proposed modal shift, not just new students, and it is not unreasonable to expect the modest change across circa 1,900 existing students to retain the current levels of private vehicle use into the future. Accordingly, the 2026 Development case is the same as the 2026 Base case with no additional traffic from the school.</p> <p>On this basis, the Amended TIA concludes that the intersections assessed will operate at satisfactory levels of service, except for the intersection of Green Road and Wrights Road, which is already beyond capacity. Notwithstanding, as the proposal does not add to this situation and there are no reasonable or economic alternatives (as described within the TIA), the proposal has been assessed as being acceptable.</p>	<p>Attachment C Attachment D</p>

4 Response to Submissions

Table 2 Summary of Responses relating to Traffic and Car Parking

Ref.	Summary of Submission	Response	Reference
	<p>Based on all of the above reasons, the Department does not support the current traffic assessment and would require you to provide an amended TIA with a revised traffic impact assessment which includes:</p> <ul style="list-style-type: none"> o the base case analysis with traffic surveys to demonstrate the current scenario of public transport usage in the school and the reliance on private vehicles during the school peak hours. o the additional traffic likely to be generated due to the student increase considering a worst case scenario (which would be based on the current scenario analysis). o modelling (using SIDRA or equivalent) at the nearby intersections that may be affected by the additional traffic. o the background traffic growth over the next 10-years including the post development scenario. o Analysis of queuing length increase due to the additional private vehicle usage and the likely impacts on the surrounding residents (especially Morris Grove). o the proposed mitigation measures including a Green Travel Plan, management measures at drop-off/pick-up zones etc. 	<p>The Amended TIA justifies the reliance on public transport, assessing that the targeted modal shift equate to just 2 additional students per bus in the PM and noting that TfNSW has previously advised (in the Proponent’s pre-consultation meeting of 7 April 2022) that a 10% increase in students using the bus can be easily accommodated within the existing bus service capacities. In addition the proposed changes to the Wrights Road carpark access mean that additional buses could be accommodated there in the future if required.</p> <p>The Amended STP (Attachment D) sets out the proposed STP measures and drop-off/pick-up zone arrangements.</p>	
1.2	<ul style="list-style-type: none"> • The Department notes that the TIA states that the application does not propose to increase the number of students coming by car, therefore the pick-up and drop-off behaviour is expected to be retained as per the existing arrangement. In this regard, the Department requires that a detailed assessment of the adequacy of the current pick-up and drop-off behaviour be provided to justify that this is satisfactory. This should include (but not be limited to) site/street observation surveys/counts by a suitably qualified person. The amended TIA should then provide: <ul style="list-style-type: none"> o a summary of the findings including number of pick-up/drop-off occurrences during morning and afternoon peak hours (the timing should be specified). o average dwell times of vehicles at the pick-up/drop-off bays. o number of vehicles queuing on site and/or on street for the pick-up/drop-off spots, any current management measures in place, the dates the observation was carried out. <p>Following the above and based on the assessment of the additional trip generation due to the additional students the amended TIA should recommend:</p> <ul style="list-style-type: none"> o any mitigation and management measures required to continue to operate with the current pick-up and drop-off arrangement. Or o proposed additional pick-up/drop-off locations (internal or external). 	<p>The Amended TIA provides further details and analysis of the historical drop-off and pickup arrangements in place at the school, how they have already been improved by staggering pick-up times and locations, and how they are proposed to be improved further under this proposal by increasing on-site queuing length from 100m to 150m in the primary carpark.</p> <p>Given that proposed STP and mode shift targets do not envisage any increase in private cars, the proposed drop-off and pick-up arrangements for light vehicles is expected to improve from the current scenario.</p>	Attachment C

4 Response to Submissions

Table 2 Summary of Responses relating to Traffic and Car Parking

Ref.	Summary of Submission	Response	Reference
1.3	<ul style="list-style-type: none"> The Hills Shire Council (Council) has provided preliminary comments with respect to the application and would be providing final comments. In accordance with the preliminary comments from Council, the Department required the amended TIA to address the following: <ul style="list-style-type: none"> allowing right turn movements from Wrights Road into the proposed redeveloped car park may result in queuing on La Vista Grove/Wright's Road thereby impacting residents access. Further queuing may result in Kings Road/Emily Clarke Dr intersection being impacted and therefore SIDRA Modelling should be undertaken at these key intersections. The TIA identifies a LOS of F at the intersection of Wrights Road/Green Road intersection. Council strongly advises consideration towards a left in left out arrangement onto Green Road from Morris Grove as this would significantly alleviate traffic flow. 	<p>Section 7.6 of the Amended TIA outlines that additional SIDRA modelling has been undertaken for the proposed new car park driveway arrangements and for the intersection of Wright Road and La Vista Grove. The results from SIDRA modelling show that both intersections performed at a LoS A during both AM and PM Peaks.</p> <p>Attachment 7 to the Amended TIA outlines various options considered to address the pre-existing performance issues associated with the intersection of Wrights Road/Green Road. As detailed by PTC, it is the through movement along Green Road that carries high volumes and needs to be disrupted as little as possible and thus, providing an access from Morris Grove to Green Road will not result in an improvement to this existing situation.</p>	Attachment C
1.4	<ul style="list-style-type: none"> The amended TIA has not been structured correctly in that it only includes the assessment of Stage 1 of the proposal. The proposal in a Concept Proposal and Stage 1 application where the SEARs has been issued in two separate parts and the EIS and appendices are required to address each part separately. Consequently, the amended TIA is required to be structured so that it assesses the impacts of the overall Concept Proposal separately to the detailed assessment of the Stage 1 works. In this regard the Concept Proposal assessment should include worst case scenarios of usage of the Performing Arts Centre or the Sports Facilities during weekends and likely traffic impacts due to such usage. 	<p>The Amended TIA outlines that the impacts of the Concept Plan and Stage 1 works relating to student numbers are the same because Stage 1 includes the student uplift.</p> <p>The DA does not seek any change to the out of normal school hours use of the Sports Centre and hence there is no additional traffic impacts or parking demands that require assessment.</p> <p>The traffic and parking impacts associated with the increase the Performing Arts Centre have been quantified in the Amended TIA, noting that the maximum use would occur infrequently throughout the year and outside of the peak hours with sufficient carparking provided on-site to cater for the anticipated parking demand.</p>	Attachment C
1.5	<ul style="list-style-type: none"> The School Travel Plan (STP) indicates that the school grounds would be used as a 'shared space' outside of the school hours. While the Department supports this, it has concerns that the TIA has not considered these impacts of usage outside of hours and estimated any additional traffic generation impacts. The amended TIA needs to relate to the commitments in the STP and provide assessment accordingly with clear and achievable mitigation measures. 	<p>As indicated above and in Section 4.12 of this Submissions Report, there is no change proposed to the existing community use of school facilities outside of school hours.</p>	Attachment C Section 4.12
1.6	<ul style="list-style-type: none"> Details are to be provided where on site the construction staff car parking arrangement would be provided. 	<p>Figure 82 at Section 9.2 (p106) of the Amended TIA shows that temporary construction worker parking will be provided on-site on the edge of the northern playing field with access from Gate 14 off Morris Grove.</p>	Attachment C

4 Response to Submissions

Table 2 Summary of Responses relating to Traffic and Car Parking

Ref.	Summary of Submission	Response	Reference
1.7	The school proposes to provide bicycle spaces for 2% of all students and seven (7) bicycle spaces for staff. This is significantly below the recommended requirement as outlined section 5.3.1 of the Traffic Report. The justification for such is due to lack of fully developed cycling infrastructure within the LGA. However, it should be noted that children under the age of 16 and adult supervisors may ride of footpaths unless otherwise signposted. In addition, should the adequate cycling infrastructure be delivered to support the demand in the future, cycling as a mode for staff and students should not be limited by the lack of bicycle spaces on site. TfNSW recommends DPE clarify if there is provision of bicycle spaces for visitors is proposed? If not, it is recommended that spaces be provided.	<p>There is no requirement under the Council's DCP or Austroads for visitor bicycle parking although the Planning Guidelines for Walking and Cycling suggest a rate of provision based on the number of staff.</p> <p>Notwithstanding that there are minimal visitors to the school during standard school hours and that it is highly unlikely that they would require many, if any dedicated bicycle parking, the Amended TIA and amended architectural drawings show that there is capacity for some visitor bicycle parking to be provided in the forecourt of the Sports Centre, as outlined in the updated Mitigation Measures (see Attachment B).</p>	Attachment C Attachment B
1.8	<p>With reference to section 6.3 of the Traffic Report and section 2.2.1 of the School Travel Plan, it is argued that by increasing the number of students of a school and FTE staff, this would innately increase the expected traffic generation of the school. To assume that no additional vehicular movement at surrounding intersections due to the proposal for students, staff and visitors to utilise public transport and active transport is unrealistic. The promotion of public and active transport does not guarantee their utilisation.</p> <p>TfNSW notes that Section 1.2.3 of the Traffic Report states that Hills Shire Council does not support a green travel plan as a means of addressing the 10% increase in student population and the associated traffic in Wrights Rd. However, it is noted that surrounding roads are under the care and control of Council. Therefore, with no provision of future traffic modelling with the proposal, especially at the signalised intersection of Green Road and Wrights Road which currently sees saturation during AM peak, onus would lie with Council to investigate the site(s) for any potential upgrades in the future if required.</p>	<p>As discussed at Item 1.1 of this table, additional justification has been provided for the proposed modal shift targets noting that there is currently no limit under existing consents relating to the number of students that can be accommodated at the school.</p> <p>The comments regarding the intersection of Green Road and Wrights Road are acknowledged although as indicated herein, the minimal increase in students can be appropriately managed by targeting a modal shift across all students and staff at the school.</p>	Attachment C
1.9	It is noted that the swept paths diagrams included within the Traffic Report are not shown clearly, i.e. boundary, kerb lines, traffic lanes etc. are hard to see therefore a proper check is not possible. However, as the proposal is taking place on the local road network this is a matter for Council to review.	Larger swept path diagrams have been provided at Attachment 5 to the Amended TIA.	Attachment C
1.10	TfNSW notes that Green Road is an important corridor for buses which is heavily congested and will likely remain congested in future due to the projected growth in the area. The proposal is likely to result in further congestion and impact upon the operation of the Green Rd/Wright's Rd intersection. However, as the proposal is within the local road network this is a matter for Council to review and investigate the intersection for any future upgrade as required.	As indicated above, the shift to sustainable travel modes across the whole student and staff population required to result in no net increase in private vehicles is small and achievable and hence it has been assessed that there will be no additional impact on the surrounding road network arising from the proposal.	Attachment C
1.11	TfNSW recommends a condition of consent be imposed requiring a Construction Traffic and Pedestrian Management Plan (CTMP) be prepared prior to the issue of the Construction Certificate.	The Applicant acknowledges this and the Mitigation Measures include such a requirement (see Attachment B).	Attachment B

4 Response to Submissions

Table 2 Summary of Responses relating to Traffic and Car Parking

Ref.	Summary of Submission	Response	Reference
1.12	TfNSW recommends a condition of consent be imposed requiring an Operational Traffic Management Plan (OTMP) be prepared prior to the issue of an Occupation Certificate.	The Applicant acknowledges this and the Mitigation Measures include requirements for the STP and an Operational Management Plan (see Attachment B) noting that an OTAMP has now been prepared (see Attachment E).	Attachment B Attachment E
1.13	TfNSW recommends a condition of consent be imposed requiring a Green Travel Plan (GTP) be prepared prior to the issue of an Occupation Certificate.	The Applicant acknowledges this and the Mitigation Measures include requirements for the STP (see Attachment B).	Attachment B
1.14	<p>The Operational Management Plan (Appendix JJ) states a staggered finish time is implemented to reduce traffic congestion. There is already significant congestion during the morning drop off and afternoon pick up, with Wrights Road often blocked for local resident traffic movements. Traffic is blocked from the traffic lights on Green Road back to the Kings Road roundabout, and for a considerable distance back into Morris Grove. The proposed changes to queuing will do little to improve the situation.</p> <p>Another issue is parents parking in inappropriate and unsafe spots, stopping on the pedestrian crossing, and driving in a generally dangerous manner with illegal U turns and other aggressive behaviour towards fellow motorists.</p> <p>Appendix FF Construction Management Plan states that the contractor is likely to require a on average 30-40 staff per day, with a maximum of 60 staff on a day. To accommodate this number of workers, on average there would be up to 30 light vehicles on site, whilst at the maximum there would be 50 light vehicles on site. As long as these vehicles are parked on site, there will be limited issues for local residents. There will be a problem if the workers chose to park in the local streets all day, especially on Thursdays or Fridays when the local rubbish collection occurs.</p>	<p>Matters relating to traffic impacts and modal shift have been addressed elsewhere in this table.</p> <p>With respect to unsafe driving and parking, the Amended STP includes communications strategies that can be used to remind parents and students of their obligations to obey the road rules and use the designated pickup and drop-off areas.</p> <p>The Amended TIA and Construction Management Plan outline that there is ample capacity for the construction worker parking demands to be accommodated on the site and a commitment to this is included in the Mitigation Measures.</p>	Attachment C Attachment D
1.15	There is no proper pick up areas especially along Wrights Road and if you happen to travel along this road during school times you will be caught up and trapped till the school pickup commences.	As detailed in the Amended TIA and this submissions report, the proposal will improve the existing drop-off and pickup arrangements by increasing on-site queuing capacity and continuing the recently introduced staggered bell times and pick-up locations which will result in an improvement over the existing situation.	Attachment C
1.16	<p>Traffic during school drop off and pick up times is a major issue for the surrounding community. Connaught Circuit is frequently used as a thoroughfare for people dropping off their children in Cormack Circuit. This causes quite a bit of congestion.</p> <p>There are impacts on traffic attempting to exit from Roseberry Rd as many parents use Luwasa Place to drop off their children which adds congestion to this already congested area.</p> <p>The largest impact though is the exit of Morris Grove onto Wright's Rd which due to the way the roundabout is placed means all traffic leaving the school is given priority through the roundabout as opposed to the traffic on busy Wright's Rd. This in</p>	<p>As discussed in this table, the minor increase in students and modal shift targets to be implemented through the Amended STP are anticipated to result in no additional private vehicles accessing the site.</p> <p>Notwithstanding, the drop-off and pickup queuing capacity on-site is being increased and other measures such as staggered bell times and pick-up locations will continue to be implemented to minimise disruption to surrounding residents and the road network, noting that the duration of pick-up activities is for a very short period of time each day and outside the evening peak.</p>	Attachment C Attachment D

4 Response to Submissions

Table 2 Summary of Responses relating to Traffic and Car Parking

Ref.	Summary of Submission	Response	Reference
	<p>concert with the current queue for drive through drop off and the pedestrian crossing make getting out of our area in the morning very challenging.</p> <p>These issues are solvable but need careful consideration in regard to traffic flow and building design as the school's expansion should not cause any more inconvenience to the local residents than it already does, especially as there were several options in the traffic study such as a left in left out of Morris Grove which have been disregarded/overlooked.</p>		
1.17	<p>There has been several times before the start and finish of school hours where students and parents are queuing to either drop of or pick up the children and blocking the residents on Wrights Road from entering their own drive ways.</p> <p>People also park in the front of houses on the curb which may prevent emergency vehicle access residents' homes on Wrights Road.</p> <p>The school should provide a parking lot for students and parents.</p>	<p>Through the proposed increase in on-site queuing distance and other measures in the Amended STP, there is likely to be an improvement to the existing situation on surrounding streets and the College will continue to communicate and educate staff, parents and students regarding their obligations to abide by the road rules.</p> <p>Furthermore, the quantum of car parking proposed complies with the requirements of Council's DCP.</p>	<p>Attachment C Attachment D</p>

4.3 School Travel Plan

Table 3 responds to the issues raised in submissions relating to the School Travel Plan (STP) and should be read in conjunction with the amended STP prepared by PTC (see **Attachment D**).

Table 3 Summary of Responses relating to School Travel Plan

Ref.	Summary of Submission Topic	Response	Reference
2.1	<p>The Department has reviewed the School Travel Plan (STP) and has concerns that the STP has no timeframes as to when such modal shift targets for active transport would occur whilst the student numbers are proposed to be increased as part of Stage 1 works. Additionally, the STP has no clear commitment as to how the modal split targets would be achieved in a location with no major transport hub access nearby.</p> <p>Accordingly, an amended STP is to be prepared addressing the following:</p> <ul style="list-style-type: none"> • Details on measurable and achievable targets, and timeframes for implementation of the proposed mode share targets with respect to the increase in student numbers in the STP including but not limited to: <ul style="list-style-type: none"> o Short term (first three years) targets identified in Table 1 and Table 2 of the STP for students and staff including increase in use of carpooling, increase in private bus use, increase of public and active transport, reduction of student and staff car usage in travelling to/from the school. 	<p>The Amended TIA outlines that the earliest planned occupation of the Stage 1 Bryson Building would be February 2026.</p> <p>The Amended STP (Table 1 p6 and Table 2 p7) for short-term and long-term targets aligning to the Stage 1 and future works, noting that the student uplift sought will occur in Stage 1.</p>	<p>Attachment D</p>

4 Response to Submissions

Ref.	Summary of Submission Topic	Response	Reference
	O Long term (> three years) targets identified in Table 1 and Table 2 of the STP for students and staff including increase in use of carpooling, increase in private bus use, increase of public and active transport, reduction of student and staff car usage in travelling to/from the school.		
2.2	• Details to how the modal shift targets would align with the increase in student numbers. In which year the increase in student numbers would be realised and would the STP be implemented by then.	See Item 2.1 above.	Attachment D
2.3	• A plan showing location of existing and proposed end of trip facilities on site. This detail is to be reflected in the architectural plans as well (architectural plans amended where required).	Sheets C12A and Sheet DA104 prepared by PMDL provide these details (see Attachment M).	Attachment M
2.4	• Include specific tools and actions to help the objectives and mode share targets (i.e. additional infrastructure – buses etc).	The methodology and tools to achieve the modal shift targets are described in Section 4 of the Amended STP.	Attachment D
2.5	• 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.	The Amended STP (Section 7.1) has been updated to outline these details noting that the STP cannot be finalised with the names of all individuals until after approval has been granted.	Attachment D
2.6	• 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 users of the development.	Sections 6 and 7 of the Amended STP include these details.	Attachment D
2.7	• Include a separate assessment of the Concept proposal as per the SEARs.	The Amended TIA addresses both the Concept and Stage 1 proposal noting that Stage 1 includes the uplift in students and staff.	Attachment D

4.4 Flooding

Table 4 responds to the flood related matters raised in submissions and should be read in conjunction with the Flood Risk Assessment and Emergency Management Plan prepared by WMS (see **Attachment F**).

Ref.	Summary of Submission Topic	Response	Reference
3.1	• The Department requests that a flood risk assessment report be prepared by a suitably qualified person addressing the full range of flooding impacts up to and including the probable maximum flood (PMF) for both Concept and Stage 1 proposal separately as per the SEARs.	A Flood Risk Assessment has been prepared by WMS (see Attachment F).	Attachment F
3.2	• You are also requested to review the comments and address each of the matters raised by Environment Heritage Group with respect to flooding.	See Item 3.4 below.	Nil

4 Response to Submissions

Table 4 Summary of Responses relating to Flooding

Ref.	Summary of Submission Topic	Response	Reference
3.3	<p>• In addition, the Department requires a detailed flood evacuation response plan be prepared by a suitable qualified person for the site.</p>	<p>The Flood Risk Assessment prepared by WMS (see Attachment F) includes a Emergency Management Plan which details the flood evacuation response protocols, noting that the site has been assessed as not being subject to flood risk from mainstream sources and that the Concept and Stage 1 proposed works are not subject to flood risk from overland flow.</p>	Attachment F
3.4	<p>EHG notes that the applicant has identified areas in the north-western corner of the site as flood prone in a 1 in 100-year flood event based on the Hills Shire Council's Draft Overland Flow Study. No further assessment has been provided to support the environmental impact statement (EIS). As such, the Secretary's environmental assessment requirements for flooding have not been satisfied. EHG notes that the flood impact risk assessment (FIRA) undertaken by the applicant should address the full range of flooding up to and including the probable maximum flood (PMF), including 0.5% and 0.2% annual exceedance probability flood events as proxies for assessing sensitivity to an increase in rainfall intensity of flood producing rainfall events due to climate change. The flood assessment should model both the existing and developed conditions for the full range of flood events and present the associated impacts of flooding both on the development and the impact of the development to adjacent properties. The FIRA should also identify any impacts including changes to flood risk on-site or off-site, and detail design solutions and operational procedures to mitigate flood risk where required, as detailed in the NSW Floodplain Development Manual (2005). EHG also notes and supports that the proposed development will adopt the required Flood Development Controls from the Hills Shire Council Development Control Plan 2012 for the design of the school, including all potential flood ingress points to below ground levels of the development, the level of the entry and relevant flood level must be stated including amenities such as doorways, fire stairs, and lifts. EHG recommends that when the applicant is considering access to the new building, flooding of surrounding streets must also be considered, particularly any loss of access along Morris Grove. EHG notes the nature of flooding in the vicinity of the site is likely to be flash overland flooding with very limited or no warning time which may pose risk to life in major flood events. It is recommended that a site-specific emergency response plan is developed in consultation with the NSW State Emergency Service. The local flood plan should be considered when preparing the emergency response plan.</p>	<p>The Flood Risk Assessment prepared by WMS (see Attachment F) assesses the Concept and Stage 1 components where it is concluded that the site is not subject to flood risk from mainstream sources and that the Concept and Stage 1 proposed works would not be subject to flood risk from overland flow.</p> <p>Notwithstanding, WMS have provided flood evacuation protocols in the Emergency Management Plan for the site.</p>	Attachment F
3.5	<p>• Development must not result in an increase in risk to life, health or property of people living or working on the floodplain.</p>	<p>Based on the assessment by WMS, the proposal is not considered to increase the risk to life, health or property.</p>	Attachment F
3.6	<p>NSW SES does not hold detailed flood risk information for this site. However, we note that parts of the area have been identified as flood prone in a 1 in 100 year event in the EIS. These are limited to the dam and drainage on the northern part of the site on the oval. Students, staff and visitors must not be exposed to the flood risk. Therefore it is recommended that development avoids this small part of the site, which it appears to be the case. In addition students, staff and visitors should be made aware of the flood risk, for example using signage.</p>	<p>Refer to assessment above.</p>	Attachment F

4 Response to Submissions

4.5 Stormwater

Table 5 responds to the stormwater issues raised in submissions and should be read in conjunction with the Stormwater Response to Submissions prepared by Birzulis (see **Attachment G**).

Table 5 Summary of Responses relating to Stormwater			
Ref.	Summary of Submission Topic	Response	Reference
4.1	<ul style="list-style-type: none"> The capacity of the stormwater system into which stormwater from the development discharges into, must be checked/analysed. Please note that the check/analysis shall be carried out to the legal point of discharge to ensure that the street pits will not be surcharged during minor events up to the 10 years ARI storm event and up to the 20 years ARI storm event for sag pit. 	A Stormwater Response to Submissions has been prepared by Birzulis (see Attachment G) which indicates that the Civil Works report submitted as Appendix S to the EIS includes modelling of the 5% and 20% AEP events although these are appended again at Appendix A to Attachment G and demonstrate that there is no overflow present in the sag pit located across from the site.	EIS Appendix S Attachment G
4.2	<ul style="list-style-type: none"> Any proposed work on council's land/road due to the proposed development shall be prepared and provided in accordance with Council's Design Guidelines Subdivisions/ Developments and Works Specifications Subdivisions/Developments. 	The Applicant acknowledges this and the Mitigation Measures include this requirement (see Attachment B).	Attachment B
4.3	<ul style="list-style-type: none"> Any proposed work on council's land/road due to the proposed development shall be subject/ requires separate approval from Council beforehand via Section 138 of the Roads Act 1993, 	The Applicant acknowledges this and the Mitigation Measures include this requirement (see Attachment B).	Attachment B
4.4	<ul style="list-style-type: none"> When OSD, Water sensitive urban design elements and Rainwater tanks are provided for the development Positive Covenant/Restriction-as-to-use – legal protection placed on a property title requiring owners to repair and maintain the OSD systems 	The Applicant acknowledges this and the Mitigation Measures include this requirement (see Attachment B).	Attachment B
4.5	<ul style="list-style-type: none"> Catchment plan (including internal and external), pipe sizes, design and existing levels shall be shown on the plans. 	The Stormwater Response to Submissions at Attachment G indicates that the Drains modelling undertaken for the project includes the catchment of each pit and the e-model can be provided at this stage or as a condition of consent and the Mitigation Measures include this requirement (see Attachment B)	Attachment G Attachment B
4.6	<ul style="list-style-type: none"> The Water sensitive urban design elements must demonstrate a reduction in annual average pollution export loads from the development site in line with the following environmental targets: <ul style="list-style-type: none"> 90% reduction in the annual average load of gross pollutants 85% reduction in the annual average load of total suspended solids 65% reduction in the annual average load of total phosphorous 45% reduction in the annual average load of total nitrogen All model parameters and data outputs are to be provided. 	The Stormwater Response to Submissions at Attachment G indicates that the Civil Works report submitted as Appendix S to the EIS includes the Music modelling and the outputs which indicate the relevant targets are achieved. These outputs are provided again at Appendix B to Attachment G . The e-model can be provided at this stage or as a condition of consent and the Mitigation Measures include this requirement (see Attachment B)	Attachment G Attachment B
4.7	<ul style="list-style-type: none"> Any proposed retaining wall shall be designed to such that it accepts and caters for any surface runoff from the up slope adjoining land in a 'failsafe' manner without affecting any other property. No diversion or concentration of stormwater surface flows will be permitted. Any proposed retaining wall including footing and subsoil drain shall be design and constructed fully inside the property boundary. 	The Stormwater Response to Submissions at Attachment G indicates that the retaining wall will be further developed during detailed design by the Birzulis structural team in conjunction with the civil team and the Mitigation Measures include this requirement (see Attachment B).	Attachment G Attachment B

4 Response to Submissions

Table 5 Summary of Responses relating to Stormwater

Ref.	Summary of Submission Topic	Response	Reference
4.8	<ul style="list-style-type: none"> Existing easements and restriction shall be shown on the plans. No structure is permitted over the existing stormwater easement draining through the site 	There is only one existing easement to drain water on the site which is located in the extreme north-western portion of the site, west of Morris Grove and north of the existing student carpark. This is noted on the survey plan submitted as Appendix F of the EIS There are no proposed structures in this part of the site under the Concept Plan or Stage 1.	EIS Appendix F

4.6 Contamination and Remediation

Table 6 responds to the contamination issues raised in submissions and should be read in conjunction with the Preliminary Site Investigation for the Concept Plan and Stage 1 prepared by EI Australia (see **Attachment H**).

Table 6 Summary of Responses relating to Contamination and Remediation

Ref.	Summary of Submission Topic	Response	Reference
5.1	<p>The submitted Contamination Report is not acceptable as testing has not been undertaken for the entire site at locations where building envelopes are proposed.</p> <p>The SEARs requires that site investigation be undertaken for the Concept Proposal aspect as well as the Stage 1 works. If testing is not undertaken at all of the envelope locations, the suitability of the site cannot be established as part of the Concept Proposal.</p> <p>The Preliminary Investigation Report as well as the Detailed Investigation Report, both need to be amended to address the Concept Proposal. If investigations or drilling/boring cannot be carried out due to existing buildings, sufficient justification and recommendations are required to be provided by a suitably qualified consultant preparing the report.</p>	<p>A Preliminary Site Investigation (PSI) has been undertaken by EI Australia (Attachment H) which relates to all parts of the site subject to the Concept Plan works and the Stage 1 works. This PSI is supplemented by the Detailed Site Investigation (DSI) that was submitted as Appendix O to the EIS.</p> <p>The PSI concludes that the potential for site contamination is low and that the site is suitable for the ongoing educational use. Accordingly, no additional DSI is required.</p>	Attachment H

4 Response to Submissions

4.7 Groundwater

Table 7 responds to the groundwater issues raised in submissions and should be read in conjunction with the Groundwater Response to Submissions prepared by JK Geotechnics (See **Attachment I**).

Ref.	Summary of Submission Topic	Response	Reference
6.1	DPE Water indicated that the proponent should: <ul style="list-style-type: none"> • provide an assessment of the activities against the 'minimal impact considerations' of the NSW Aquifer Interference Policy (AIP). • provide estimates of groundwater take during construction and operation of the proposed development. • demonstrate the ability to obtain sufficient entitlement to cover maximum proposed take, if required. 	<p>The PSI prepared by EIA (see Attachment H) indicates that ground water was encountered at a depth of approximately 5.0-5.5m below ground level.</p> <p>As the proposed excavation works for Stage 1 are to be a maximum of 2.5-3.0m at the southern end of the building and future concept plan works are unlikely to involve excavation other than for building footings, it is highly unlikely that there would be any interference with groundwater.</p> <p>JK Geotechnics has provided a comment on groundwater (Attachment I) indicating that seepage from the ground around the area to be excavated to be very slight and that it is not normal practice to try to quantify the volume of seepage in such instances, there being no practical method by which to try to quantify such ephemeral flows.</p> <p>Notwithstanding, JK Geotechnics would expect it to be much less than the nominal 3Ml/year which would allow exemption under the AIP noting that the requirements of NSW DPE regarding inflows to excavations are not intended to capture sites such as this where seepage is not related to the water table level.</p>	Attachment H Attachment I

4.8 Water Infrastructure

Table 8 responds to the water infrastructure matters raised in submissions.

Ref.	Summary of Submission Topic	Response	Reference
7.1	• The water, wastewater and recycled water system should have adequate capacity to service the proposed development.	Noted – the Infrastructure Report by HDR submitted as Appendix T to the EIS confirms that the existing water and wastewater infrastructure surrounding the site is suitably sized to accommodate the proposed development.	EIS Appendix T
7.2	• Amplifications, adjustments, and/or minor extensions may be required.	The Infrastructure Report by HDR submitted as Appendix T to the EIS does not identify any assets that would require amplifications, adjustments or extensions.	EIS Appendix T
7.3	• The Concept Plan proposes the removal of 136 trees and new landscaping works including the planting of 284 new trees. When determining landscaping options, the proponent should take into account that certain tree species can cause	The project Landscape Architect – Arterra— has reviewed Sydney Water’s Technical Guidelines for Building Over and Adjacent to Pipe Assets, the Sydney Water Act s46 and the Sydney Water plan drawing for the site dated 03.02.23.	Nil

4 Response to Submissions

Table 8 Summary of Responses relating to Water Infrastructure

Ref.	Summary of Submission Topic	Response	Reference
	cracking or blockage of Sydney Water pipes and therefore should be avoided. Sydney Water has specific requirements for tree planting to ensure our pipes and assets are not adversely affected by tree removals and planting. Please refer to the "Tree Planting" section in Attachment 1 for specific guidelines and requirements that may apply.	<p>Arterra has advised that the majority of Sydney Water pipe assets are located in the road reserve outside of the site with only small intrusions into the site between Wrights Road and the Wrights Road carpark and at the corner of Morris Grove and Wrights Road (which is partially concrete encased).</p> <p>Diagram 5 in Sydney Water's Building Over and Adjacent Pipe Assets requires a root-barrier to be installed if the pipe asset is located under a future mature tree canopy and suggests that trees not be planted closer than half of the mature tree canopy drip line radius to a pipe asset.</p> <p>The majority of the existing and proposed trees around the perimeter of the school sites are about 7m from Sydney Waters pipes. Some will be within the outer half of the dripline radius to the pipes in the road reserve. This is acceptable if a root barrier is installed in accordance with Sydney Water's technical Guidelines and this can be required as a condition of consent and has been included as a Mitigation Measure.</p> <p>If during design development it is found that there are trees that are considered too close to Sydney Water pipe assets, a number of alternative options are available including:</p> <ul style="list-style-type: none"> • adjust the location of the tree; and/or • change to a smaller species which will have a smaller diameter of mature drip line. 	

4.9 Energy Infrastructure

Endeavour Energy reviewed the proposed development and provided comments based in a standard response format. Whilst the Endeavour Energy submissions indicates that the EIS did not appear to address the easements and electricity infrastructure on or near the site, this is incorrect as Section 6.14 of the EIS, Section 3.1 the Infrastructure Assessment Report at Appendix T to the EIS and the Survey at Appendix F to the EIS clearly identify relevant infrastructure and existing easements.

Notwithstanding, Endeavour Energy noted that the proposed works are in locations that are unlikely to directly impact on the existing padmount substation easements or restrictions and this is correct.

On that basis, Endeavour Energy recommend approval of the application subject to conditions. In addition, Endeavour Energy has provided standard advices for the applicant's attention.

Table 9 includes a summary of the conditions and advices and a brief response.

4 Response to Submissions

Table 9 Summary of Responses relating to Energy Infrastructure

Ref.	Summary of Submission Topic	Response	Reference
8.1	Advice— Applicants should not assume adequate supply is immediately available to facilitate their proposed development.	The Infrastructure Assessment by HDR at Appendix T to the EIS indicates that the existing infrastructure is suitably sized to cater for the proposed development. Notwithstanding, it is acknowledged that an application for supply will be required prior to a CC being issued.	EIS Appendix T
8.2	Advice— Before commencing any underground activity the applicant must obtain advice from the Before You Dig service.	Noted. The Applicant accepts that this will be a condition of development consent.	Nil
8.3	Advice— All electricity infrastructure shall be regarded as live and care must be taken to not interfere with any part of the electricity network.	Noted.	Nil
8.4	Condition— The construction of any building or structure connected to or in close proximity to the electrical network must be properly earthed.	Noted. The Applicant accepts that this will be a condition of development consent.	Nil
8.5	Condition— Preference is for no activities to occur in easements and they must adhere to minimum safety requirements.	As indicated above, no works are proposed within any existing easement.	Nil
8.6	Advice— Electricity infrastructure should not be subject to flood inundation or stormwater runoff.	As detailed as Section 4.4 of this Submissions Report, the site is not considered to be flood affected to the extent that it would impact on any existing or proposed electricity infrastructure.	Nil
8.7	Condition— Access to the electricity infrastructure may be required at any time particularly in the event of an emergency.	Noted. The Applicant accepts that this will be a condition of development consent.	Nil
8.8	Advice— Design electricity infrastructure for safety and environmental compliance consistent with safe design lifecycle principles.	Noted.	Nil
8.9	Condition— Applicants will need to submit an appropriate application based on the maximum demand for electricity for connection of load.	Noted. The Applicant accepts that this will be a condition of development consent.	Nil
8.10	Advice— Development should avert the possible risk to health from exposure to emissions from electricity infrastructure such as electric and magnetic fields (EMF) and noise.	Noted. The proposal does not include or require any new electricity infrastructure that would likely give rise to EMF radiation or noise.	Nil
8.11	Advice— Public safety training resources are available to help general public / workers understand the risk and how to work safely near electricity infrastructure.	Noted.	Nil
8.12	Advice— Any building or structure must comply with the minimum safe distances / clearances for the applicable voltage/s of the overhead power lines.	Noted.	Nil

4 Response to Submissions

Table 9 Summary of Responses relating to Energy Infrastructure

Ref.	Summary of Submission Topic	Response	Reference
8.13	Advice— Low voltage service conductors and customer connection points must comply with the 'Service and Installation Rules of NSW'.	Noted.	Nil
8.14	Advice— Streetlighting should be reviewed and if necessary upgraded to suit any increase in both vehicular and pedestrian traffic.	Noted.	Nil
8.15	Advice— Reducing greenhouse gas emissions and helping customers save on their energy consumption and costs through new initiatives and projects to adopt sustainable energy technologies.	Noted.	Nil
8.16	Condition— Landscaping that interferes with electricity infrastructure is a potential safety risk and may result in the interruption of supply.	Noted.	Nil

4.10 Built Form and Amenity

Table 10 responds to the built form and amenity issues raised in submissions and should be read in conjunction with the Architectural Response to Submissions (see **Attachment J**), Concept Plan Shadow Diagrams (see **Attachment K**), Stage 1 Shadow Diagrams (see **Attachment L**), amended elevations and sections, calculation sheet and end-of-trip facilities details (see **Attachment M**) prepared by PMDL.

Table 10 Summary of Responses relating to Built Form and Amenity

Ref.	Summary of Submission Topic	Response	Reference
9.1	<ul style="list-style-type: none"> State Design Review Panel No.2 comments state that 'Ensure the amenity of the deep interior spaces is maintained through design development and natural light and ventilation are maximised. Provide detailed drawings, including sections and daylight analysis, as part of the planning application.' Based on the above, the Department requires you to provide detailed drawings including sections and daylight analysis to address the above concerns.	PMDL has prepared an Architectural Response to Submissions (see Attachment J) including natural light and ventilation diagrams which demonstrate that the Stage 1 Bryson Building is capable of achieving suitable access to light and ventilation.	Attachment J
9.2	<ul style="list-style-type: none"> A separate shadow diagram should be provided for Stage 1 works (Bryson Building) as per the SEARs (currently the shadow diagrams provided with the architectural plans for Stage 1 are related to the Concept Proposal only). 	Separate shadow diagrams for the Concept Plan and Stage 1 have been prepared and demonstrate that the assessment undertaken within the EIS remains valid – that is, <i>“the proposal would not result in significant adverse overshadowing of adjoining properties and the overshadowing of the public domain (road reserve) is considered reasonable”</i> .	Attachment K Attachment L
9.3	Height <ul style="list-style-type: none"> Given the surrounding context being primarily two storey detached single dwellings, consideration should be given to the appropriateness of the built form, specifically the height proposed. 	The following is an assessment of the proposed height having regard to additional detail provided on the amended sections and elevations prepared by PMDL (see Attachment M):	EIS – Section 6.2 Attachment M
9.4	2. Building Height	<ul style="list-style-type: none"> Whilst the Stage 1 Bryson Building will have a maximum height of approximately 18.9m measured to the uppermost roof of the 4th 	

4 Response to Submissions

Table 10 Summary of Responses relating to Built Form and Amenity

Ref.	Summary of Submission Topic	Response	Reference
9.5	<p>The current zoning for most of the school sets building heights at 10 m. The proposed four storey Bryson Building will exceed that limit. On what basis does the school think that this acceptable for local residents?</p> <p>I am not against the project as a whole as the area is growing and expansion is necessary. However the issues I have with the project centre around building height and traffic during school pick up and drop off times. The area of Kellyville where the school is located is low density residential and the introduction of a 4 storey building to this area sets a worrying precedent for future development in both a business and residential capacity. The current businesses on this side of Green Rd are not retail but health care and remain in keeping with the local area. A 4 storey building in this area will, I believe have a significant impact on the visual landscape around the school as the school, since its last redevelopment particularly, already has a significant impact on the skyline more so than the closely located shopping centre.</p>	<p>storey, the ends of the building are lower at approximately 6.25-12.6m (southern end) and 14.2-15.7m (northern end) from the existing ground level;</p> <ul style="list-style-type: none"> - At its southern end, the Bryson Building will be only slightly higher (approximately 2.4m) than the western adjoining Building 14 and approximately 3.4m higher than the eastern adjoining Building 13. - Notwithstanding, only a small portion of the new building would likely be visible from Wrights Road as demonstrated at Figure 35 of the EIS and this is not considered to be detrimental to the streetscape, would not cause adverse overlooking or adverse overshadowing. - At its northern end, the Bryson Building will be approximately 3.4m higher than the new Branwhite Centre Building and be setback approximately 74m from the nearest site boundary. As demonstrated at Figures 36-38 of the EIS, although visible from Morris Grove, this elevation of the building will sit comfortably within the context of school buildings which already exceed the LEP height limit. - In addition, the future stage extension to the sports centre will be similar in height to the existing sports centre building and only slightly greater than the LEP height development standard, with no significant adverse overshadowing or privacy impacts. 	
9.6	<p>There seems to be ample space on the site to expand in a lower height, less landscape-changing fashion which would satisfy the school's need for expansion without such a significant impact on the surrounding community.</p>	<p>As indicated above, it is considered that the proposed building heights do not have an adverse streetscape or visual impact in the locality and providing more buildings on other parts of the site would potentially have greater visual impacts, reduce the available outdoor play areas and likely reduce the ability to increase tree canopy on the site.</p>	Nil
9.7	<p>Please provide Gross Floor Area for all the proposed building envelopes under the Concept proposal.</p>	<p>Sheet C02B prepared by PMDL provides these calculations (see Attachment M).</p>	Attachment M

4 Response to Submissions

4.11 Noise

Table 11 responds to the noise and vibration related matters raised in submissions and should be read in conjunction with the Noise and Vibration Impact Assessment for the Concept Proposal (see **Attachment N**) and the Amended Noise and Vibration Impact Assessment for Stage 1 (see **Attachment O**) prepared by SLR.

Table 11 Summary of Responses relating to Noise			
Ref.	Summary of Submission Topic	Response	Reference
10.1	The Department requests that an addendum noise impact assessment report be provided assessing the noise impact of the concept proposal separate to Stage 1 works, including the worst-case scenario as per the SEARs. The structure of the Noise Report should address the impacts of the Concept Proposal and Stage 1 in two separate parts.	A Noise and Vibration Impact Assessment for the Concept Plan has been prepared by SLR Consulting (Attachment N) and the Noise and Vibration Impact Assessment report submitted with the EIS has been amended to relate solely to the Stage 1 works (Attachment O).	Attachment N Attachment O
10.2	<ul style="list-style-type: none"> The noise assessment for the future performing arts centre and the sports facilities should include an overall worst case scenario analysis of the impacts of the use of these facilities on the nearby identified sensitive receivers. This would be required to justify the suitability of location of the envelopes in their proposed locations, despite the fact that detailed noise assessments would be required as part of the future development applications for these facilities. 	<p>In the absence of detailed designs for the future concept plan stages of the proposal, the Noise and Vibration Impact Assessment for the Concept Plan prepared by SLR Consulting (Attachment N) determines the maximum allowable noise levels at the facades of the concept buildings nearest to the identified potentially noise affected receivers. These Sound Pressure Levels can be required as a condition of consent requiring future stage DAs to comply with these levels. The Mitigation Measures for the project have been updated accordingly (Attachment B).</p> <p>The noise and vibration assessment also assesses the potential impacts of activities outside of normal school hours including the worst case scenario being the evening use of the performing arts centre. The assessment predicts minor exceedances of the noise criteria to the residential receivers on Morris Grove and on the western side of Green Road arising from light vehicle use of the carpark under the existing sports centre building and the at-grade secondary carpark. However, the assessment notes that both carparks have previously approved for use out of normal school hours, there is no change to the existing use of the carparks, this worst case scenario is unlikely to occur during typical use (i.e. it is limited to a few occasions throughout the year as indicated in Table 11) and the exceedances are minor in nature. Furthermore, SLR assess that the exceedances at receivers west of Green Road are unlikely to have any significant impact given the noise environment at that location arising from general traffic on Green Road.</p>	Attachment N Attachment B

4 Response to Submissions

4.12 Community Use of School Facilities

The EIS identified various school facilities that are currently shared with various community groups and organisations with these details provided at Section 3.1 Tables 5 and 7 of the EIS. No change is proposed to these activities under the Concept Plan or Stage 1 – i.e. the school will continue to make facilities available for these uses.

Notwithstanding, the DPE has requested additional information regarding the management of school facilities that are proposed to be shared with the community including the following:

- each school facility that is proposed to be made accessible to the community, including timing for when these facilities would be made available;
- how access to the site and individual facilities would be achieved (noting that security boom gates are detailed on the architectural plans);
- the community use of on-site car parking (i.e. confirm if the community would have access to the school's car parking areas during core school hours); and
- how the school would manage student safety at times when the community has access to the school grounds; and
- any security measures that would be implemented after core school hours.

Additional detail in regard to users and time of access is provided in **Table 12** and in relation to security and parking the following arrangements are in place and will continue to be applied:

- All external users of the school premises and facilities are granted access on a case-by-case basis with representatives of the user groups issued security swipe cards to access various security gates and buildings around the school premises;
- The school premises is fitted with CCTV cameras on all public street frontages and all buildings are alarmed;
- Some staff are on-site from 6am on weekdays during school terms until at least 4:30pm and are responsible for contacting off-site security if the need arises;
- On-site security is available between 4:30pm and 10:30pm on weekdays during school terms;
- On-call security is available between 10:30pm to 6am weekdays and all hours on weekends and school holidays (back-to-base monitoring system); and
- On-site parking is made available for all community users via swipe card access provided with each hire. Access is granted to the specific carparking and building/s being hired.

It is noted that the proposed development will not result in any change to the range, type or scale of use of school facilities by community groups and hence there is no additional impact arising from this use that warrants impact assessment.

4 Response to Submissions

Table 12 Additional Information relating to Community Use of School Facilities

Building/ Facility	Community User/s	Pax (max)	When Used	Site Access	Parking (spaces)
K to 6 Hall	Church	50	Sundays, Christmas Day, Good Friday 8AM-5:30PM	Gate 5	43
Performing Arts Hall	Dance Studio/ Groups	20	Weekly on weekends, 9AM to 12PM	Gate 3	36
	Community Drama group	20	Once per year, Saturday evening 5PM to 10PM	Gate 3	36
	Community band	20	Weekly on a weeknight, 7PM to 9:30PM	Gate 3	36
	Church youth groups (or alike)	200	Twice per year, Friday/Saturday evening 6PM to 10PM	Gates 3 and 16	146
The Space	As per Performing Arts Hall	150	Typically 3-4 per year, Saturday/Sunday 1PM to 5PM	Gates 3 and 16	146
Classrooms	Salvation Army Red Shield Appeal	50	One weekend per year 7:30AM to 5PM	Gate 16	110
	Language School	20	Once a month – typically a weekday 3:30PM to 5:30PM	Gate 16	110
	Mental Health Provider	20	One weekend per month, Saturday 8AM to 5PM	Gate 16	110
	Code Camp	60	Weekdays in school holidays (2 x 2 day camps)- 8:30AM to 5PM	Gate 16	110
Sports Centre	Local Little Kickers Group (with Oval access)	80	Weekly on Saturdays 8AM to 1:30PM	Gate 16	110
	Dance Studio/ Groups	20	Weekly on Wednesdays 4PM to 6PM	Gate 16	110
	Sports Camp (with Oval access)	150	Weekdays in school holidays (2 x 3 day camps) 8AM to 5PM	Gate 16	110
	Church youth groups (or alike)	150	Typically 2-3 per year, Friday evening 4PM to 10PM	Gate 16	110
Ovals	Local cricket clubs	20	Pre-Season, 2-3 per year	Gate 16	110

4 Response to Submissions

4.13 Waste Management

The DPE requested that an addendum Waste Management Plan be provided addressing the Concept Proposal separately as per the SEARs.

In response to this request, Elephant Foot Consulting has provided a letter (see **Attachment P**) indicating that because the total student uplift envisaged by the Concept Plan (i.e. 2050 students) will be achieved in Stage 1, the Operational Waste Management Plan prepared by Elephants Foot Consulting that was lodged as Appendix JJ to the EIS is applicable for both Stage 1 and the Concept Proposal.

4.14 Infrastructure Contributions

Council noted that the proposed development is subject to The Hills Section 7.12 Contributions Plan and that a contribution of 1% of the cost of works will be applicable prior to the issue of any construction certificate.

As detailed in Section 6.15 of the EIS, we are of the opinion that the consent authority should exercise its discretion and not impose a condition of consent requiring a monetary development contribution as the proposal is for demolition of existing buildings and construction of a new building with ancillary works to improve the operations of the College, with only a modest increase in the number of students.

In addition, the proposal will provide for additional and embellished recreation facilities, sports facilities and educational facilities within the site with no increase in private vehicle traffic demand and the College will continue make its facilities available for community use as detailed in **Table 12** of this Submissions Report.

Accordingly, the College and enhanced facilities will continue provide a valuable community resource and benefit.

4.15 Aboriginal Cultural Heritage

The DPE requested that an addendum Aboriginal Cultural Heritage Assessment report be provided addressing the Concept Proposal separately as per the SEARs.

In response to this request, Tocomwall (formerly known as Yarrowalk) has updated the Aboriginal Archaeological Cultural Heritage Assessment report (see **Attachment Q**) to more clearly address the impact arising from the Concept Plan and the Stage 1 Works, noting that the impact of Stage 1 is no different to the impacts of the Concept Plan.

4 Response to Submissions

4.16 Social Impact

Sarah George Consulting has reviewed the public submissions and provided an overview (**Attachment R**) of the key issues raised in those submissions and how the issues have been addressed in the original EIS or in the additional information that is provided as part of this Response to Submissions. In addition, an amended Social Impact Assessment report has been prepared (**Attachment S**) and **Table 13** below details how these documents respond to the requirements of DPE.

Table 13 Summary of Responses relating to Social Impact			
Ref.	Summary of Submission Topic	Response	Reference
12.1	<ul style="list-style-type: none"> The SIA requires assessment of impacts pre-mitigation and then post-mitigation. The submitted impacts need to be identified as either positive or negative and one of the following: low, medium, high or very high. Refer to table 6 social impact significance matrix in SIA Guideline – Technical Supplement. 	The Amended SIA includes an assessment matrix in accordance with the SIA Guidelines which grades the significance of the potential impacts of the proposal and specifies the identified mitigation measures.	Attachment S
12.2	<ul style="list-style-type: none"> The SIA is required to include a separate assessment for the Concept proposal as per the SEARs. 	The Amended SIA identifies where there may be different impacts associated with the Concept Plan and Stage 1 works and includes a separate assessment where relevant, noting that some impacts are the same for both Concept and Stage 1.	Attachment S
12.3	<ul style="list-style-type: none"> The amended SIA needs to include a signed declaration as per the SIA Guideline. 	The Amended SIA includes a signed declaration.	Attachment S

5 Updated Project Justification

5.1 Introduction

This section of the report provides an updated justification for and evaluation of the project arising from the additional investigations and project details which accompany this report. The justification has regard to the economic, environmental and social impacts of the project and the principles of ecological sustainable development.

5.2 Summary of Assessment of Potential Impacts

5.2.1 Environmental Impact

The environmental impact of the proposal has been assessed in detail in **Section 6** of this report with key matters summarised as follows:

- Overshadowing – Overshadowing of the proposed new buildings and structures arising from the Concept Plan and Stage 1 works has been assessed and is limited to a small portion of Green Road which is considered acceptable.
- Visual Privacy – The Stage 1 works, in particular the Bryson Building, have significant separation from adjoining residential properties and future stages are provided sufficient separation and can employ mitigation measures such as windows screening and boundary landscaping if required.
- Visual Impact – The proposal will fit within its context and the visual impact is acceptable, noting that the existing school buildings are a longstanding part of the character of the locality and some already exceed the LEP height development standard.
- Biodiversity, Trees and Landscaping – The proposal has prioritised the removal of lower value trees over higher value trees, will increase the number of trees on the site and will provide for a greater canopy coverage at maturity than the existing situation. A BDAR Waiver has been issued for the proposal.
- ESD – The project is targeting a Green Star equivalency of 5 Stars under the latest version of Green Star (Buildings V1). By targeting of 5 Stars, the project will be aligned to the ESD principles under Clause 193 of the EP&A Regulation.
- Traffic – Access, parking and traffic have been assessed in detail and demonstrated to be satisfactory. The proposal would provide for additional on-site queuing and would not result in an increase in the existing traffic situation through the implementation of the School Travel Plan and additional sustainable travel facilities onsite.
- Noise and Vibration – Construction noise and vibration impacts can be managed/mitigated through a Construction Environmental Management Plan (CEMP). Mechanical plant and traffic noise impacts associated with the increase in student population are unlikely to result in adverse impacts. Noise from children’s play areas exceeds the noise criteria in some locations although given the small increase in student numbers, the additional noise as a consequence represents an imperceptible 1dB increase on noise levels currently experienced. In addition, whilst there are minor exceedances arising from light vehicles associated with the worst case scenario for out of normal school hours use, the occurrence of these is limited to a few times per year and this is a pre-existing situation.
- Flooding – The site has been assessed as not being subject to flood risk from mainstream sources and the Concept and Stage 1 proposed works are not subject to flood risk from overland flow. Notwithstanding, an Emergency Management Plan includes flood emergency protocols.

5 Updated Project Justification

5.2.2 Economic Impact

The proposal will likely have a positive economic impact as it will cater for population growth, provides an economic use of land, and will provide employment opportunities. The proposal will provide additional capacity for the forecast increase in enrolment demand at the College associated with the growth of the north-west Sydney region. The development of the existing site is considered the most economic design option allowing for the re-use and retention of some buildings, infrastructure and providing a significant investment to enhance the existing College. The proposal would provide for employment opportunities through construction phases as well as and the ongoing operation of the school (with an increase from 211.5 FTE to 225.5 FTE staff).

5.2.3 Social Impact

The proposal is unlikely to generate any long term negative social impacts. Temporary negative impacts are likely to be associated with construction. Traffic, parking and noise impacts on surrounding residential properties can be addressed through specific design and operational measures. The visual impact of the proposal is considered to be low to moderate given the minimal direct interface to adjoining properties.

5.3 Mitigation of Impacts

The impacts of the proposed development can be mitigated, minimised or managed. Amended mitigation measures are outlined in **Attachment B**.

5.4 Consistency with Strategic Context

The proposed development is consistent with the strategic context as outlined in **Section 2** of the EIS report including State, regional and local plans and policies. The proposal will provide additional student capacity and employment opportunities for local schooling in a greener (greater tree canopy and other measures), safe (CPTED and other principles), energy efficient (ESD), healthy, inclusive (including Aboriginal children, children with special needs support and people with a disability), transport-connected and high-quality learning environment.

5.5 Compliance with Statutory Context

The proposal complies with the relevant statutory planning considerations as summarised at **Section 4** and **Appendix C** of the EIS report. In summary:

- The proposal is consistent with the Objects of the EP&A Act;
- The proposal is state significant development pursuant to SEPP PS;
- This EIS has been prepared in accordance with the SEARs;
- A BDAR waiver has been issued and no further assessment is required under the EPBC Act or BC Act. The EIS addresses vegetation impact;
- The proposal is traffic generating development pursuant to SEPP TI due to the student increase and parking area, requiring referral to TfNSW. TfNSW has been consulted in the preparation of the EIS and the information requested incorporated into the Traffic Impact Assessment;
- The proposal complies with the design quality principles for schools contained within SEPP TI;
- The proposal is accompanied by a PSI report for the entire project and a DSI for Stage 1 works which demonstrate the suitability of the site, in satisfaction of SEPP RH;
- The proposal complies with LEP 2019 with the exception of building height. The proposed departure from the building height development standard is considered

5 Updated Project Justification

justified in this instance due to its central location with no significance adverse visual, view loss, privacy or overshadowing impacts to adjoining properties; and

- A DCP does not apply to SSD. Notwithstanding, the proposal is generally consistent with DCP 2012.

5.6 Consultation

The project team has carried out consultation in accordance with the SEARs including with community and public authorities. The process and outcome of this consultation is provided in **Section 5** of the EIS report. There was very limited feedback from community consultation and only four (4) public submissions arising from the statutory notification of the EIS.

The design has taken into consideration the comments received including the design advice provided by the State Design Review Panel and traffic comments made by Council and TfNSW. Stakeholder views will continue to be considered in the exhibition of the EIS and subsequent assessment processes.

5.7 Compliance Monitoring

Subject to the implementation of the mitigation measures in **Appendix B** there is not considered as specific need for this project for any ongoing compliance monitoring.

5.8 Impact Assessment Uncertainties and Resolution

The EIS, this Submissions Report and supporting documentation respond in full to the SEARs. The potential impacts of the proposal have been documented and the DPE has sufficient information to be able to assess and determine the SSDA.

6 References

Birzulis Associates (6 February 2023), Stormwater Response to Submissions letter

DFP Planning Pty Ltd (June 2023), Amended Mitigation Measures

DFP Planning Pty Ltd (February 2023), Submissions Register

EI Australia (29 May 2023), Preliminary Site Investigation Concept Plan and Stage 1

Elephants Foot (10 February 2023), Addendum Waste letter

JK Environments (30 January 2023), Hydrogeological Conditions letter

PMDL Architecture + Design (13 February 2023), Architectural Response to Submissions

PMDL Architecture + Design (13 February 2023), Shadow Diagrams – Concept Plan

PMDL Architecture + Design (13 February 2023), Shadow Diagrams – Stage 1

PMDL Architecture + Design (May 2023), Amended Architectural Drawings Sheets DA-104, C12A, C02B, DA-210, DA-211, DA-212, DA-310, DA-311, DA-312, DA-313

PTC (6 June 2023), Operational Traffic and Access Management Plan

PTC (6 June 2023), School Travel Plan

PTC (27 June 2023), Traffic Impact Assessment

Sarah George Consulting (March 2023), Social Impact Assessment

Sarah George Consulting (9 March 2023), Social Impact Response to Submissions

SLR Consulting (20 March 2023), Noise and Vibration Impact Assessment – Concept Plan

SLR Consulting (20 March 2023), Noise and Vibration Impact Assessment – Stage 1

Tocomwall (5 June 2023), Aboriginal Archaeological Cultural Heritage Assessment

WMS (8 March 2023), Flood Risk Assessment and Emergency Management Plan