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SUBMISSIONS REPORT

SSDA-8865 Mod 1
St Anthony of Padua Catholic
College

Prepared for
SYDNEY CATHOLIC SCHOOLS
3 August 2021

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1. INTRODUCTION

This Submissions Report has been prepared by Urbis on behalf of Sydney Catholic Schools (**SCS**) (the 'Applicant' in respect of the Section 4.55(2) application to modify the State Significant Development (**SSD**), Application (SSD-8865) which granted concept approval for site layout, access points, buildings and open space and detailed development approval for the staged construction of the St Anthony of Padua Catholic College at 125-165 Tenth Avenue and 140-170 Eleventh Avenue, Austral NSW 2179 (the project).

This report addresses the matters raised by public agencies and the community during the public exhibition of the Section 4.55(2) modification application. The modification application was on public exhibition between 10 May 2021 – 24 May 2021. During this period, nine (9) submissions were received. These were submissions from:

- Environment, Ecology and Science (**EES**);
- NSW Environment Protection Agency (**NSW EPA**);
- NSW Royal Fire Service (**NSW RFS**);
- Transport for New South Wales (**TfNSW**)
- Roads and Maritime Services (**RMS**);
- Endeavour Energy;
- Liverpool City Council (**Council**);
- Austral Progress Association; and
- one public submission

This Submissions Report has been prepared with reference to clause 85A of Division 6 of the *Environmental Planning and Assessment Regulations 2000* (**EP&A Regulations**) which states as follows:

(1) The Planning Secretary is to provide to an applicant for State significant development the submissions, or a summary of the submissions, received in relation to the application during the submission period.

(2) The Planning Secretary may, by notice in writing, require the applicant to provide a written response to such issues raised in those submissions as the Planning Secretary considers necessary.

As minor design refinements have been made to the modification application since lodgement, notice is also provided under Section 121b of the **EP & A Regulations** of the intent to formally amend the modification as submitted with the plans attached to this Submissions Report.

During the preparation of this Submissions Report, guidance has been taken from the *State significant development guidelines – preparing a submissions report July 2021* prepared by the NSW Department of Planning, Industry and Environment (**DPIE**). Accordingly, this Submissions Report provides:

- **Section 2** - An analysis of submission received.
- **Section 3** - Identification of the actions taken since the public exhibition period, including any amendments made to the project.
- **Section 4** - A comprehensive response to the issues raised in the submissions.
- **Section 5** – An updated project evaluation and conclusion.

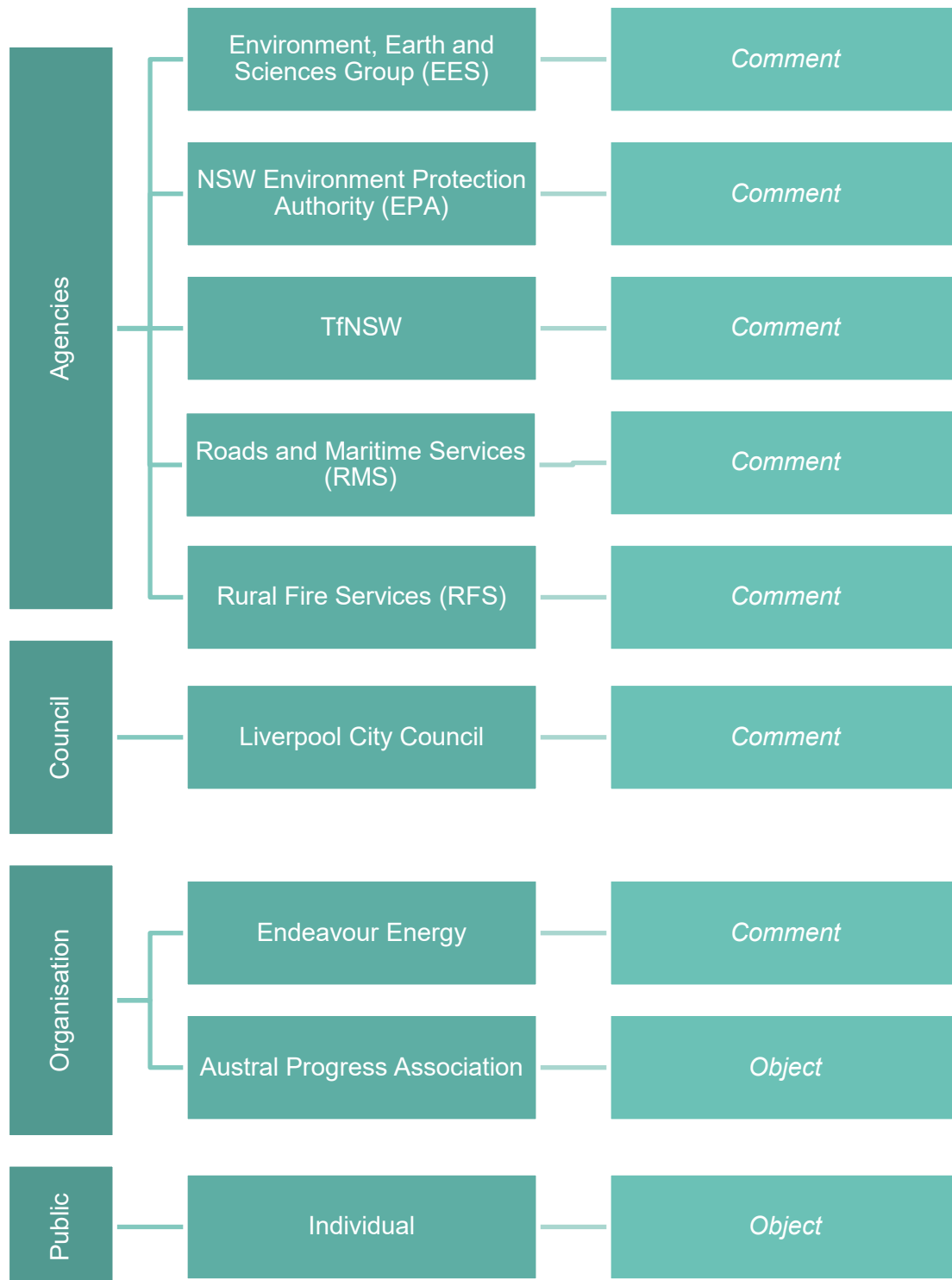
The proposed amendments and justification for the proposal is outlined in the specialist documentation provided as follows:

- Amended Architectural Plans prepared by DWP (**Appendix A**)
- Amended Flooding Report prepared by GRC (**Appendix B**)

The proposal will have no unreasonable or significant traffic, and environmental impacts on adjoining or surrounding properties. This documentation contained in this Submissions Report and the Section 4.55(2) report dated 3 May 2021 confirms that there are no significant adverse impacts associated with the proposed modification to the project and that it should be approved subject to appropriate conditions.

2. ANALYSIS OF SUBMISSIONS

The Section 4.55(2) application was placed on public exhibition between 10 May 2021 – 24 May 2021. During this period, government agencies, Council, key infrastructure stakeholders and the community were invited to make written submissions on the project to NSW DPIE. As outlined in the summary below, a total of nine submission were received from agencies, Council, a community organisation and one member of the public during the exhibition period. Of these, seven neither supported nor objected to the proposed modification. The submission from the community organisation and from the member of the public objected to the proposed modification.



The following items were identified as requiring a response from the proponent:

- Staging
- Traffic upgrades (surrounding road network improvements)

For each submission that has been received, **Section 4** provides a description of the matters raised in the submission, a summary of the response, and a reference to where these issues have been addressed in the detailed documentation as required. The identified issues have been discussed further in **Section 5**, which provides additional justification where warranted.

3. ACTIONS TAKEN SINCE EXHIBITION

An overview of the actions taken since the public exhibition of the project is outlined in **Table 1**.

Table 1 Summary of actions taken since exhibition

Action	Description
Project refinements	Since lodgement and public exhibition of the Section 4.55(2), the proponent has further developed the design of the project and made some minor amendments to the built form of the college and additions to supporting site infrastructure. These primarily arise as a result of ongoing design development and refinement of the scheme. In summary, the changes relate primarily to refining the built form of the main hall building and providing increased amenity and functionality to the college and include: ▪ Minor increase to the roof height of the main hall building to accommodate the roof trusses specified by the structural engineer. The roof height will be RL 85.00 rather than the previous lodged submission of RL 84.30. ▪ Refinement of the window arrangement in the façade of the main hall to improve daylight penetration to align with the ESD strategy and green star targets. ▪ Incorporation of a bus shelter for students adjacent to the Eleventh Avenue ▪ Conversion of external access stairway from main school building to an undercover walkway The design refinements are illustrated in the amended Architectural Drawings (Appendix A) prepared by DWP.
Further engagement	<u>Community Consultation</u> Urbis has been engaged by the Catholic Archdiocese of Sydney (CAS) Property Team to support St Anthony's of Padua Parish (parish) in effective parishioner engagement relating to the future vision of the parish. The approved college masterplan has allocated new parish facilities for a new church and parish centre to create a unified parish and college campus. Urbis has been working closely with CAS, the parish priest and the college principal to develop messaging and materials for several visioning sessions with the parish community. The vision sessions were scheduled for the end of July 2021 but will be rescheduled following the outcome of the current Sydney COVID-19 lockdown.
	<u>Liverpool Council</u> SCS met with Council on 12 July 2021 to discuss the proposed modification and the timing for the delivery of the roadworks surrounding the site. Council advised that its preferred position was a single lane roundabout with a view to changing this to traffic lights in the future subject to TfNSW agreement. It is understood that Council will separately pursue this matter with TfNSW. At this meeting it was agreed that the roundabouts could be provided prior to the student population reaching 1,350. This is an increase on the 1,088 students currently referenced in Condition E10 of the consent. On 26 July 2021 SCS wrote to Council providing a record of the meeting discussion and requesting a letter of support

Action	Description
	confirming the agreed position. The SCS letter to Council has been included at Appendix C. Correspondence from Council will be forwarded to DPIE when it is received.
Further assessment	<u>Flooding Assessment</u> In consideration of the comments received on the modification by the Department of Environment, Energy and Science (EES), GRC Hydro has undertaken an updated flooding assessment. The flooding assessment prepared to support the Section 4.55(2) modification application did not consider all built form approved on the site under SSD 8865. The updated flooding model shows that there will be localised off site flooding impacts, but these primarily affect Sydney Catholic Schools (SCS) owned land and a tributary of South Creek. Refer to the Flooding Assessment at Appendix B and Table 2 for further discussion of these results.

4. RESPONSE TO SUBMISSIONS

The following **Table 2** provides a summary of all submissions received and respective response.

Table 2 Response to submissions table

Issue	Referral comment	Response to submission
Traffic and Parking	There are a number of inconsistencies within the documentation due to which the Department is unable to assess the overall traffic impacts and the mitigation measures of the modified proposal. The Department requests that you clarify: the approval pathway used for the construction of the eastern carpark, which is currently operational. The Department notes that this originally formed part of the approved development.	Condition A10 of SSDA 8865 provides that the project may be constructed and operated in sub stages, generally in accordance with staging plan DA059 Revision 2 dated 10/3/2020. The eastern carpark (carpark 5) was originally identified as part of Phase 2 under SSDA 8865. It was constructed as part of Phase 1, due to the requirement for additional carparking provision on site earlier than anticipated. The construction phasing is still generally in accordance with the existing approval. The planned construction phasing has been updated as part of the modification to reflect existing and projected student enrolments and the growth of the school.
	the basis of the figures used in paragraph 14 of the Traffic Report prepared by Colston Budd Rogers & Kafes dated 12 April 2021 (such as the student numbers in various stages and the triggers to the roadworks), given that they are inconsistent with the student numbers in the modification report.	It is acknowledged that the figures cited in the April 2021 CBRK report are inconsistent with those in the modification report. The reference to 300 students mentioned in the April 2021 report was derived from CBRK's previous experience negotiating warrants assessments for pedestrian crossing. The 1,150 figure was a clerical error transcribed from an earlier student population plan. The triggers for roadworks are set out in the modified Condition E10- refer discussion regarding this below.
	how the proposed staged road upgrades / student number increases have been developed and why these do not align with the approved phased development. For example, the trigger for road upgrades, as approved, is prior to Phase 3 (1088 students), with an interim crossing prior to student numbers reaching 659. However, the trigger for the commencement of construction of such	As noted above, the construction of the approved development has varied slightly from the construction phasing approved in SSDA 8865. The rate of enrolments has increased faster than originally projected and accordingly the college has to cater for a larger student population on site earlier than anticipated. To address this, the surrounding roadworks that were originally part of Phase 3 have

Issue	Referral comment	Response to submission
	upgrades, as proposed in the modification application, is 975 students. There is no information provided to inform whether the interim roadworks are proposed at 659 students and what is the impact of no roadworks being done for students up to 975.	been commenced early as part of Stage 1 with Section 138 Roads Act approvals obtained from Liverpool Council. This includes: - roadworks to Eleventh Avenue - an interim (painted) pedestrian crossing to Eleventh Avenue (as required under Condition E11). - roadworks to Tenth Avenue (including the pedestrian crossing) and Fourth Avenue have commenced and will be completed in the last quarter of 2021 The interim roadworks required by the consent (the pedestrian crossing to Eleventh Avenue) will be completed prior to the college reaching 659 students. All works to the surrounding external roadworks (with the exception of the roundabouts) will be completed as part of Stage 2 prior to the student population reaching 975. This fast tracking of required works to the surrounding roadworks will improve traffic flows and pedestrian safety around the school earlier than previously planned and is a positive outcome for the school and the surrounding community.
1.	when school pedestrian crossings will be provided and confirm whether the interim crossing at Eleventh Avenue has been constructed in accordance with condition of approval E11.	The interim pedestrian crossing to Eleventh Avenue has been constructed as part of construction Stage 1 as required by Condition E11. Council has requested that SCS now upgrade this to a raised 'wombat' crossing and an application for these external road works has been lodged with Council.
2.	how is the modification to Condition E10 proposed	As noted above SCS has consulted with Council regarding the program for the delivery of the roadworks surrounding the site, including the roundabouts. Council has agreed that the roundabouts can be provided by time the student population reaches 1,350, an increase from the 1,088 currently referenced in Condition E10. The increase in student numbers to 1,350 will provide additional time for the necessary land acquisition, a factor that is beyond the control of SCS. Refer to SCS letter to Council at Appendix C.

Issue	Referral comment	Response to submission
		Accordingly we propose the following changes to Condition E10 Roadworks, Access and pedestrian infrastructure <i>E10. Prior to the commencement of operation of construction phase 3 or the school student numbers reaching 1088 1350 (whichever occurs earlier), the following roadworks required by this development consent must be completed to the satisfaction of the Certifier. The roadworks must include:</i> <i>(a) construction of the two roundabouts at the intersection of Fourth / Tenth Avenues and Fourth / Eleventh Avenues with signage and line marking;</i> <i>(b) construction of full width of the road reserve for Eleventh Avenue with the required footpaths, shared cyclist / pedestrian paths, signage and line marking;</i> <i>(c) construction of full width of road reserve for Tenth and Fourth Avenues with the require footpaths, signage and line marking works; and</i> <i>(d) construction of all associated vehicular crossings / access points to the site; and</i> <i>(e) construction of pedestrian crossings (either Wombat crossing or any other interim crossing as permitted by the warrants and approved by the relevant roads authority) with associated signage and line marking.</i> <i>The Applicant must obtain approval for the works under section 138 of the Roads Act 1993, where required prior to completion of the above roadworks.</i>
3.	- why the Year 1-4 building, as depicted in the proposed staging plan, is shaded in grey	This error has been corrected in the updated plan set. The Years 1-4 building is part of Stage 1 and is shaded orange. Refer to amended plans at Appendix A.

Issue	Referral comment	Response to submission
4.	- why the approved 'Phase 1' and proposed 'Existing' figures differ, as indicated in proposed Condition B8 Table 1. For example, the 'Existing' figures show a reduction in both car and bicycle parking spaces when compared to the previously approved 'Phase 1'.	The carparking and bicycle parking numbers approved as Phase 1 were intended to reflect the existing parking and bicycle provision on the site and should have been identified as 'existing' rather than 'Phase 1'. Since the SSDA approval and the engagement of a new project architect the proposed carparking layouts have been refined. While the approved total number of car parking and bicycling spaces has not changed, they have been distributed slightly differently across the site. With the reduction in the number of phases, the majority of carparking will be delivered in Stage 1. Stage 1 is under construction and the site currently provides 66 car parking spaces, 42 drop off spaces and 10 bicycle spaces.
Student numbers	- why 'Existing' student numbers are shown as 360 in proposed condition B8 Table 1, an increase of 66 students beyond that approved for 'Phase 1' and exceeding the approved capacity of the school under Council consent DA465/2016.	The increase in student population in Phase 1 beyond that approved under DA16/2016 reflects additional students accommodated in demountable classrooms installed using the exempt development provision of <i>SEPP Education 2017</i>. These demountable classrooms were installed after approval of the SSDA 8865. As noted above, the rate of enrolments has increased faster than anticipated and these additional students have had to be accommodated in temporary demountables while construction progresses. The population is consistent with that approved up to Phase 2 of the SSDA
Biodiversity	The site is biodiversity certified. EES's previous comments were in relation to species selection for landscaping. According to the Landscape Master Plan on the website for this modification, the planting schedule includes a number of CPW species, and therefore is considered to be satisfactory.	Noted – no further action required.
Flooding	EES comments relating to emergency management requirements under the Probable Maximum Flood Event provided on the original SSD application are still applicable. The north-eastern portion of the site will have early learning and kindergarten facilities. This area is a flood storage and will be subject	GRC Hydro has re-run the flood modelling to reflect the up-to-date site masterplan. Refer to Amended Flooding report at Appendix B. The extension to the existing early learning centre in the north east corner of the site replaces the existing flood storage basin this area. This basin was integrated into the school playground as part of

Issue	Referral comment	Response to submission
	to inundation with floodwater depth in the order of 0.5m to 1m under the PMF Event. The proponent will need to develop an emergency management plan, in consultation with Council and SES, to eliminate any potential risks to children attending these facilities during major and rarer flooding events through provision of safe evacuation for children and staff members. A shelter-in place strategy may be a possibility as the duration inundation is expected to be short.	existing primary school. This area will no longer be flood storage and has been removed from the model. The revised flooding assessment shows that in the post development scenario, there will be three areas of increased flood level for the 1% AEP event: -Increase to the south west in kerb gutter area of the roadway, no impacts to private property -Increase to the south east to land owned by the Proponent -Increase to the north to a tributary of the South Creek waterway. Flood affectation is not increased to any property other than land owned by the proponent. The proposal also reduces flooding risk to the occupants of the school by removing the retardant basin. Overall, the flooding impacts are not considered material. The safety risk to children needs to be managed and it is considered that the benefits to student safety outweigh the minor offsite impacts on the creek and on balance these are considered to be acceptable. Condition of consent E20 of SSD 8865 requires the preparation of an Emergency Management Plan prior to the operation of Stage 1 to address the safe evacuation of students and staff in a Probably Maximum Flood (PMF) event. The proponent understands this requirement and the modification does not seek to change this condition.
	The development site will be regraded which would have impacts on overland flow paths. The south eastern portion will have higher elevation under the post-development condition, which would restrict overland flow paths and cause afflux in the order of 0.3m to 0.5m in the adjoining property under an 1% AEP Flood Event. The adjoining property has limited extent of inundation under existing conditions and the floodwater depth is expected to be in the order of 0.1m to 0.3m under an 1% AEP Flood Event. The proponent should notify the changes in flooding conditions to the adjoining property	The flood model has been re-run as noted above. The maximum floodwater affectation identified to the adjoining properties is: -0.1m-0.3m to the south west -0.3m-0.5m to the south east. The adjoining property to the south east is owned by the proponent. Future development on this site will have regard for the flooding impacts of the school.

Issue	Referral comment	Response to submission
	owner and keep provisions for inter-allotment drainage to facilitate development in the future at the adjoining property.	The school development improves offsite flooding conditions to the lots to the south west, which under existing conditions show inundation of 0.5m-1m under the existing conditions.
Environmental protection	The EPA has no comments to provide on this project and no follow up consultation is required.	Noted-no action required.
	TfNSW has reviewed the modification application and notes that the proposed reconfiguration of the approved internal layout does not result in changes to the approved student numbers and vehicular access arrangements. As such, TfNSW raises no objections to the proposed modification, as it has minimal impacts on the classified road network. The requirements in the TfNSW letter dated 5 December 2019 also remain applicable.	Noted – no action required
	The RMS submission referred to and duplicated the TfNSW submission.	Noted – no action required.
Bushfire	The New South Wales Rural Fire Service (NSW RFS) submission provides recommended consent conditions concerning Asset Protection Zones, Internal Roads, Water and Utility Services and Landscaping.	The RFS submission recommends conditions of consent to be applied to the modification. The project bushfire consultant has reviewed the RFS submission and confirmed that these are standard conditions of consent that the project is able to comply with. No further action is required at this stage.
Network Capacity / Connection	Endeavour Energy has noted from the Section 4.55(2) Modification Report the proposed amendments do not appear to have a direct or significant impact on the existing or required electricity infrastructure. Notwithstanding the proposed amendments the recommendations and comments provided therein essentially remain valid.	Noted- no action required.
Traffic	Austral Progress Association is concerned about the traffic congestion on Tenth Ave, Austral which has occurred since the residential land development in Austral commenced and considerably increased over the past 12 months. Tenth Ave is an unmarked roadway. The increase in traffic congestion has been generated through residential land	The submission requests that consideration be given to: -widening the internal access road off Tenth Avenue -bringing forward the planned works to extend the internal road access road from Tenth Avenue to exit at Eleventh Avenue - currently scheduled for 2025-2026.

Issue	Referral comment	Response to submission
Access	development in Austral, the drop off/pick up for Austral Public Primary School, street parking to residential housing, and aged care developments. It is noted there are 'no changes to access arrangements'. With St (Anthony's) Internal Road accessed from Tenth Ave the traffic congestion will increase considerably when the access road is opened. The extension of the internal access road through to Eleventh Avenue is due to commence in Stage 3 2025-2026 with 1661 students. By then the traffic effect and increase of traffic flow in Tenth Ave will have increased significantly. If the access road is constructed through to Eleventh Avenue the traffic congestion on Tenth Ave may not increase so significantly. At the access gateway in Tenth Ave to the Internal pick up/drop off road can consideration be given to increasing the width of Internal road entry access at Tenth Ave to allow easier vehicular traffic entry and exit and avoid the occurrence of possible accidents.	There is no change to the approved internal access road and vehicular access points to the site under this modification. The Colston Budd R and Kafes (CBRK) assessment of the approved site layout found that the internal access road complies with the expected vehicular generation and design parameters for the vehicles that will use it, without resulting in undue impacts on the surrounding road network. Widening the access road would have consequential impacts on the built form of the school and is not necessary from a traffic management perspective.
	The increase in residential land development has increased the traffic flow on the surrounding roads of Fourth Avenue and Edmondson Ave not just Tenth Ave. The (ability of)Tenth Ave to accommodate this given traffic volume is questionable given the limitation of the width and condition of the road without road works.	The submission is concerned that Tenth Avenue (at its current width and condition) is not able to accommodate existing traffic generation from surrounding residential generation. SSDA 8865 includes the full width road widening of Fourth Avenue and Tenth Avenue to the site boundary. This outcome was negotiated and agreed with Liverpool Council and forms part of the conditions of the SSD consent. The CBRK traffic assessment submitted with the original SSDA found that the proposed road widening would accommodate expected traffic generation, including residential traffic generation around the site.
	By the time enrolments reach 1150 students the ability of Tenth Ave to accommodate the traffic volume is questionable. Given the existing traffic problems and the future increase in traffic flow to Tenth Ave when St Anthony's School Internal drop off/Pick up access Road opens	As noted above, the timing of the planned road widening and upgrade works were assessed by CBRK as part of SSD 8865 and found to be acceptable.

Issue	Referral comment	Response to submission
	an upgrade to Tenth Ave would be required well before the 1150 students is reached. With the Internal Drop off/Pick up connection road to Eleventh Ave proposed in Stage 3 2025-2026 with 1661 students by then the traffic effect and increase of traffic flow in Tenth Ave will have increased significantly. With the secondary effect of traffic congestion related to delays is the inability for parents to estimate travel time to school and work, the stopping and starting in traffic jams, manoeuvring vehicles through parked vehicles and traffic and the senseless reaction to traffic congestion – road rage. All these have a significant impact on teachers, parents and children lives and their safety, and emergency services access to Tenth Ave. The Austral Progress Association Inc seek consideration be given to Tenth Ave roadworks commencing at significantly earlier date and student enrolments be below the 1150 noted.	The proposed modification does not seek to delay the delivery of road upgrades and improvements around the site. The proposed changes instead bring forward planned external road works around the site. The road widening and upgrade of Tenth Avenue is to occur at Stage 2 (2023-2024), brought forward from the previously approved Stage 3. This is when the school will have 975 students. The connection of the internal access road through to Eleventh Avenue remains part of Stage 3.
Notice of modification	Notification of this modification was only provided to some organisations and resident a few days ago, giving very little time to study and digest the proposal and the modifications.	The modification was publicly notified in accordance with the relevant statutory provisions from 10 May 2021 – 24 May 2021.
	This project is way too big for the location it is in, to place over 2000 student into a school, within this location is excessive. It brings with it the need for over 300 car movements (based on the plans), for not only the staff working at the school, but also parents dropping off students, meaning there would potentially be well over 300 car movements per morning and then again in the afternoon. Added to this is the need for at least 40 full size buses twice a day. This amount of vehicle movements twice a day, into what is already a very congested set of roads surrounding the school leaves it open to a very high potential for accidents causing serious injury.	The school development and maximum student population were approved under SSD 8865 and are not subject to change under this modification. Traffic and parking impacts were assessed as part of SSD 8865 and found to be acceptable.
	Additionally, the works already undertaken by the school in relation to Eleventh avenue are way to (sic) inadequate, and the roads	SSDA 8865 includes the full width road widening of Fourth Avenue and Tenth Avenue along the site boundary. It also includes partial

Issue	Referral comment	Response to submission
	surrounding the school are too narrow, and then add the congestion that this traffic movement, along with the normal traffic from not only the residents travelling along these roads, but also the nearby Austral Public, this has a (sic) extremely high potential for serious accidents involving cars and pedestrians. Even noting in the proposal, the installation of pedestrian crossing, does not alleviate this high risk, as the roads are too narrow to accommodate such a large volume of vehicles and pedestrians and reduced visibility, and these roads have no potential to be widened, due to the dwellings already present on these roads.	widening of Eleventh Avenue incorporating a bus bay adjacent to the main school entrance. The upgrade and widening works to the surrounding streets including the pedestrian crossings to Eleventh and Tenth Avenue were negotiated and agreed with Liverpool Council and form part of the conditions of the SSD consent. The proposed road upgrades were assessed to be adequate from a vehicular management and safety perspective to cater for the increased traffic movements attributed to the school.
	Also noted in the plans is a proposed Bell Tower, which from the plans is to be located on the Eleventh Avenue side of the school, which would then project across the school towards Tenth Avenue, and out to Fourth Avenue and Edmondson Avenue. The volume required from this bell, would need to be excessively loud, so as to project to all corners of the school. Due to the direction that the noise of the 'bell' is required to travel, this noise would impact upon the surrounding houses and businesses, including, but not limited to, the Aged Care Facility and houses directly opposite, along with the retirement village beside the aged care facility.	The acoustic impacts associated with the original SSD 8865 and the proposed modification were assessed by JHA and found to be acceptable and in compliance with the relevant amenity criteria. The assessment considered the impacts of traffic noise, students playing outside and the bell. No additional acoustic mitigation measures have been identified as being required.
	Additionally, this school was to be built in 6 stages, but in the modifications, it appears that this has been changed to 4 stages, thus reducing the timeframe for full completion. By reducing the number of stages, on such a large project, bringing in well over 2000 students, into what is in reality a small sized block for the quantity of student slated to attend, reduces the ability for the impact of the schools development to be monitored as it grows, and to be restricted when it is found that there is too greater risk to, not only the business and residents surrounding the school, but also the students themselves, from the sheer amount of traffic using, what is essentially roads that	The development and maximum approved student population of 2,280 were approved under SSD 8865 and are not subject to change under this modification. Traffic and parking impacts were assessed as part of SSD 8865 and found to be acceptable. The proposed changes to the construction staging do not change the maximum student population. It is also noted the construction stages were not intended to serve as 'hold' points for review of the appropriateness of the size of the college and do not serve this purpose.

Issue	Referral comment	Response to submission
	are too narrow to accommodate, what is already a high volume of traffic.	
	Any expansion from its current size, in light of the stages already built, along with the developments in the surround area and suburb, is already putting too great a risk on the lives of the people travelling through and within the area around the development.	The student population was approved under SSD 8865 and it not proposed to be increased. The impacts associated with the approved student population were found to be acceptable as part of the original SSD 8865 assessment.
	Also, the school plans need to be adjusted to remove the impact on neighbours from the noise that will be generated by the school, not only by the 'Bell Tower', but also the number of student in the school ground generating noise during breaks, plus the volume of traffic (buses and cars) generating noise to a level that will severely impact the neighbours living and peace.	The acoustic impacts associated with the original SSD 8865 and the proposed modification were found to be acceptable and in compliance with the relevant amenity criteria. No additional acoustic mitigation measures have been identified as being required.

5. UPDATED EVALUATION AND CONCLUSION

This Submissions Report has been prepared to address the matters raised by government agencies, authorities, community organisation and public submissions during public exhibition of the proposed Section 4.55(2) application to modify the SSD-8865.

In summary, no significant material changes are proposed to facilitate the approval of the proposed modification. Following lodgement of the Section 4.55(2) application and receipt of submissions on the proposed development and the DPIE's identification of key issues letter, the proponent has:

- Provided updated technical information including a revised flooding assessment and additional justification where required to address questions and concerns raised by government agencies, a communist organisation and one member of the public.
- Proposed minor design refinements to the architecture of the proposal, including an amendment to the roof height of the main hall building and the inclusion of a bus shelter to provide additional amenity to school students. These changes have been documented within the amended architectural package and notice provided under Section 121b of the EP and A Regulations to amend the modification application.
- Engaged with Council regarding the delivery of roadworks around the site including the delivery of roundabouts and a resolution has been agreed with Council about the delivery of all roadworks infrastructure after the student population reaches 1,350.

These actions have resulted in the final design outcome presented within the amended Architectural Plans at **Appendix A**. This additional information does not modify the conclusions of the planning assessment provided in the Section 4.55(2) modification report.

In summary, the proposed modification is considered suitable for the site and worthy of support by the Minister for the following reasons:

- The proposed modification will not result in any adverse environmental impacts. The proposal will not result in any adverse built form (bulk, overshadowing) impacts, traffic and parking, privacy (visual, acoustic), or ecological impacts.
- The proposed modification will not result in any significant changes to bushfire and flooding risks on the site.
- The minor increase to the height of the main hall is negligible. The increase in height will have no adverse impact on the streetscape and the building will remain below the highest elements on the site, being the belltower. This has been documented within the updated Architectural plans as appended.
- The proposal includes a modified staging plan which will deliver the necessary buildings and surrounding traffic infrastructure to support the planned student population with consent conditions updated to reflect updates to staging plans and student and car parking numbers.
- The proposal does not have any unacceptable impacts on adjoining properties, the public domain or end users in terms of traffic, social and environmental impacts.

As outlined throughout this report, the proposed modification is in the public interest, responds to the statutory requirements under the *Environmental Planning and Assessment Act 1979* and has adequately addressed and responded the submissions received during the public exhibition period. As such, the proposed modification in its current form is considered appropriate for the site and should be supported by the Minister for Planning as the consent authority for State Significant Development.

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APPENDIX A

AMENDED ARCHITECTURAL PLANS

APPENDIX B

AMENDED FLOODING ASSESSMENT

APPENDIX C

LETTER FROM SCS TO LIVERPOOL COUNCIL

