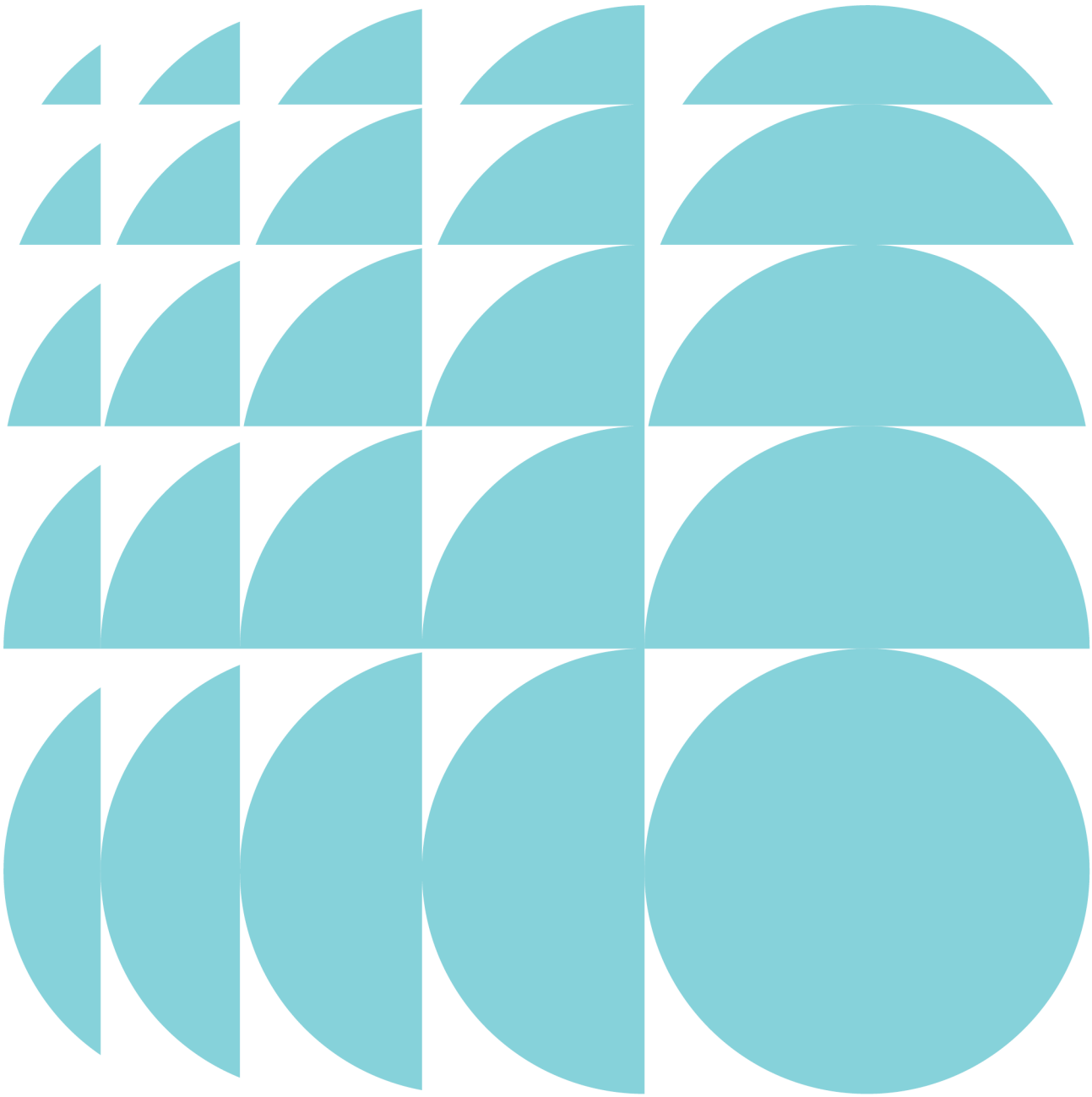
ETHOS URBAN

Response to Submissions and Additional Information

18 Forbes Street, Liverpool
New Liverpool Primary School

Submitted to Department of Planning, Industry and Environment
On behalf of Health Infrastructure NSW

12 November 2021 | 2190413



Ethos Urban acknowledges the Traditional Custodians of Country throughout Australia and recognises their continuing connection to land, waters and culture.

We acknowledge the Gadigal people, of the Eora Nation, the Traditional Custodians of the land where this document was prepared, and all peoples and nations from lands affected.

We pay our respects to their Elders past, present and emerging.

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1.0 Introduction

An Environmental Impact Statement (EIS) in support of a State Significant Development Application (SSDA) for the construction and operation of a new primary school, including a new school building of up to four storeys including core school facilities, teaching spaces and support units, and associated works was publicly exhibited for a period of 28 days inclusive between 29 June and 26 July 2021 (SSD 10391).

In total 11 submissions were received from government agencies or public authorities. No submissions were received from the public.

The applicant School Infrastructure NSW (SINSW) and its specialised consultant team have reviewed and considered all issues raised.

Further, in order to appropriately respond to a number of issues raised by agencies, the project team has carried out a review of the project. This has resulted in amendments to some elements of the design. Design development changes include:

- Reduction of overall building footprint.
- Minor design refinements, including:
  - Relocation of southern egress stair further west following BCA review.
  - Consolidation of plant area to ground floor (south west of building)
  - Additional Storage Room to Level 2 above Special Programmes Rooms on L1 (previously double height space)
  - Delivery of the pre-school as 'Cold Shell', excluding fit out.
  - Reduced setback to Lachlan Street entry link (L1 & L2).
  - Building height reduced from 14.8m to 14m top of roof.
- Landscaping changes, including:
  - Removal of east / west site link to the south of Administration building
  - Additional tree planting, and amendments to tree planting schedule.
  - Replacement of pest tree species with more appropriate trees.
- Minor adjustment of building services

This report, prepared by Ethos Urban on behalf of the applicant, sets out the responses to the issues raised and includes design amendments made to SSD 10391 in accordance with Clause 55 of the *Environmental Planning and Assessment Regulation 2000* (EP&A Regulation).

This report should be read in conjunction with the original EIS prepared by Ethos Urban (including appendices and dated 22 June 2021) and other supporting documents contained within the appendices (see Table of Contents).

2.0 Consultation

Since the exhibition of the EIS, the project team reached out to Transport for NSW and Liverpool City Council to discuss the project, the issues raised in their submissions, however neither organisation responded in time to inform this RtS. Ongoing meetings have also been held with the South West Sydney Local Health District (SWSLHD) who are the adjacent landowners, and these meetings will continue throughout the project.

3.0 Key Matters and Responses

This section of the report provides a response to the following key issues raised by the Department of Planning, Industry and Environment (the Department) and other agencies during the exhibition of the SSD:

- Open space
- Flooding
- Noise
- Drop off and pick-up arrangements
- Mode share targets
- Traffic generation and mitigation
- Bicycle infrastructure
- Design
- Archaeology

A detailed response to each of the other individual issues raised by the Department and other agencies is provided in the Response to Submissions table at **Appendix A** and by specialist consultants within the other supporting documentation (refer to Table of Contents).

3.1 Open Space

Issue

In their correspondence, the Department queried the amount of open space provided for both the new primary school and the adjacent Liverpool Boys and Girls High Schools. Further, the Department requested a breakdown of the amount of open space for each of the different schools, and the compliance with the Department of Education's Educational Facilities Standards and Guidelines (EFSG) requirement of 10m^2 of unencumbered play space per student.

Further, the Department stated that the Social Impact Assessment that accompanied the EIS should address the impacts of loss of open space on the students and community.

Applicant's Response

The New Liverpool Primary School (NLPS) provides 12,800m^2 of unencumbered play space, which has been designed by landscape architects Spackman Mossop Michaels to provide a variety of places for active and passive play, social interaction and outdoor learning within the courtyard central to the school building, as well as a large open play area to the south sized to accommodate a full-sized soccer field.

The allocation of open play space in this development does not adversely impact the existing High School's open play space requirements. Student capacity for the High Schools is up to 2,000 students and conservative calculations allow for 23,000m^2 of unencumbered play space, including grassed area sized to accommodate a full sized rugby field.

It is acknowledged that the EFSG and its design requirements are a Department of Education requirement and not a planning compliance consideration. Notwithstanding, the open play areas are designed in accordance with the EFSG's 10m^2 per student, and 7m^2 per preschool student.

- Primary School: 12,000m^2 = 10m^2 per student
- Support Unit: 400m^2 = 10m^2 per student
- Preschool: 285m^2 = 7m^2 per student
- High School: 23,000m^2 = 13m^2 per student

The High School and Primary School are provided with sufficient unencumbered play area to operate independently, however their proximity and site relationships can provide opportunity for shared use if operationally desired.

A diagram of the unencumbered play space is provided at **Figure 1** to clarify area allocations.

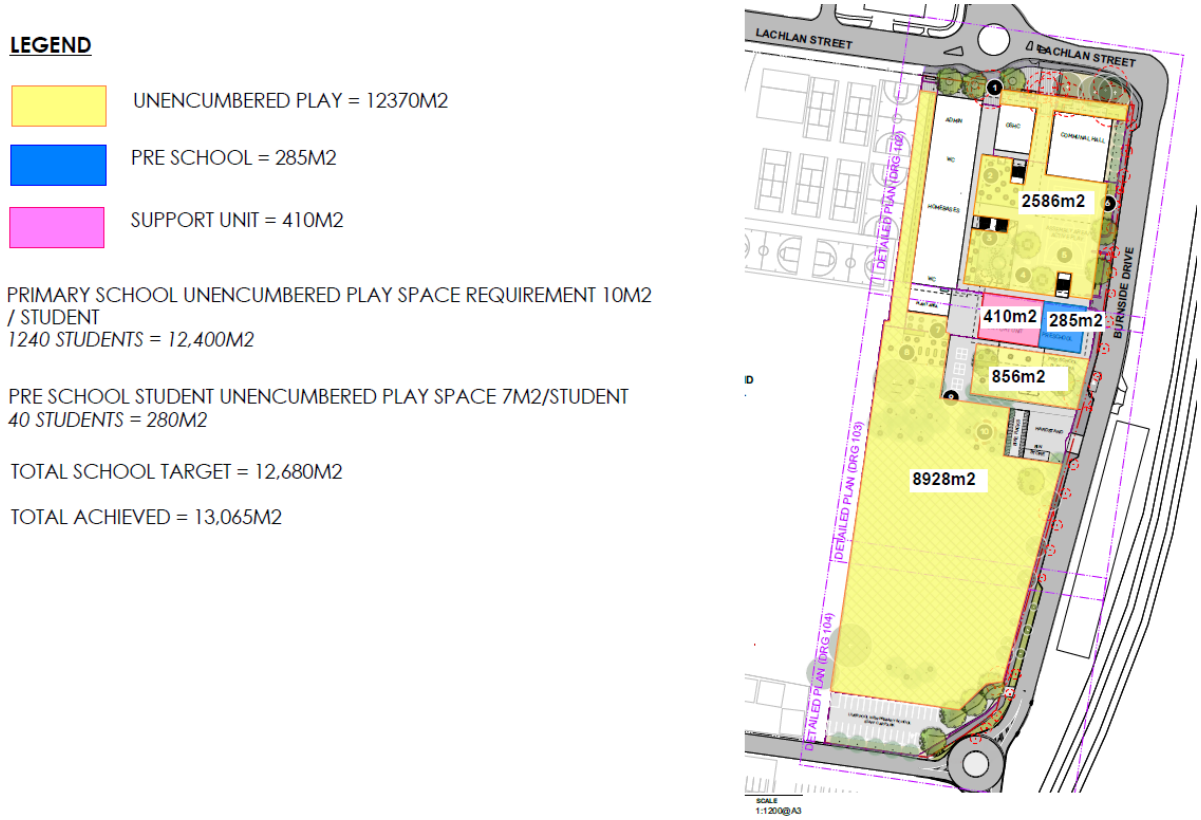

Figure 1 Unencumbered area for Liverpool Boys and Girls High School and NLPS

Source: Fitzpatrick and Partners

In relation to the Social Impact Assessment, the SIA has been updated to provide further commentary that:

- Currently, the open space provision per High School student on the overall site is well above the EFSG standards.
- The proposed design solution accommodates the open space needs of both the public school and high schools in a compliant manner, and provision for the High Schools will remain above the EFSG standard of 10sqm per student, providing 13m^2 per high school student.
- Proximity and site relationships of the schools can provide opportunity for shared use if operationally desired.
- The proposal will provide a net benefit to the local Liverpool community, as increased number of members of the local community will have access to open space on this site. Note that the current and future local Liverpool community does not consist of the High School students/staff/parents only, but also includes the Primary School community and the broader public.
- Overall, any loss of open space is outweighed by the number of communities that will benefit from the much-needed social infrastructure proposed to be delivered on this site, noting that existing community facilities in the LGA are under significant strain due to population growth.

3.2 Flooding

Issue

Both the Department and Liverpool City Council queried the existing flood characteristics of the site, and whether the minimum designed RL of 9.3 was adequate in addressing the Georges River Probable Maximum Flood (PMF) level of RL 10.88. By having a minimum RL of 9.3, the school is required to have a flood evacuation plan.

Applicant's Response

Setting the floor level to the PMF level of Georges River, i.e. RL 10.8 (potential RL 11.2 in latest modelling as advised by Liverpool Council), plus 500mm of freeboard will have major design implications on the planning of the new school, including the creation of significant urban design and accessibility issues, when compared to the adopted level of RL 9.3 of the current scheme. For example, raising the floor level to RL 10.8 will require:

Raising the floor level to meet PMF will have major design implications, including:

- Excessive pedestrian access ramps to allow DDA compliant entry to the building - minimum 28m length to achieve RL 10.8 + free board or minimum 33.6m length to achieve RL 11.2 + free board.
- Create embankments that will divorce the site from the surrounding precinct
- Creates an undesirable experience at the ground plane for students and community members that is inconsistent with the Quality Design Principles established by the State Environmental Planning Policy (SEPP) for Educational Establishments and Childcare Facilities, 2007. A significant disconnect between the building RL and street level significantly compromises the ability to deliver a proposal that is welcoming, accessible and inclusive to people with differing needs and capabilities.

Accordingly, designing to the PMF level is not considered to result in an appropriate outcome for the school or local community.

Based on the above, the new buildings have been designed to comply with Liverpool CBD PMF level which is a more likely event, whilst addressing the potential Georges River PMF through introduction of a Flood Management Plan. The flood management plan will focus on evacuation strategy through the site and will be development by a flood engineer as is typical.

It is noted that the above approach will ensure the protection of life, not assets. Therefore, the new building structures and other assets may be at risk of flood impact during a PMF event. This approach is acknowledged by the asset owner SINSW as an acceptable outcome that balances the best outcome for the design and users of the site, while ensuring safety of the users via an appropriate Flood Management Plan.

3.3 Noise

Issue

The Department noted that the Noise and Vibration Impact Assessment that accompanied the EIS did not include an assessment of the pre-school operation and Out of Hours School Care (OOSH) operation that would be occurring outside of school hours.

Applicant's Response

Although not explicitly stated in the NVIA report, the environmental noise emissions from the building services plant serving the pre-school component and related traffic have been included in the NVIA.

The environmental noise emission assessment which considered outdoor play did not include the preschool component. It is understood that there will be a maximum of 40 children attending the preschool.

The increase in outdoor play noise levels as a result of the inclusion of the pre-school children would be less than 0.1 dB, as per the Noise and Vibration Report at **Appendix G**. Therefore, it is concluded that the outdoor play assessment included in the NVIA is representative of the likely noise emissions from the whole school including the pre-school component.

Further, the OOSH care will operate from 7am. There will be no outdoor play before 7am therefore the outdoor play environmental noise emission impact assessment completed as part of the NVIA is considered representative. Operation of the OOHS care will require the operation of three condenser units. Environmental noise emissions from the operation of three condenser units would meet the project noise trigger levels at all receivers.

No further assessment for both the pre-school operation and the OOSH operations is deemed necessary.

3.4 Traffic and Transport

Issue

The Department raised several concerns relating to the traffic and transport assessment for the school. This included the following issues:

- Drop off and pick-up arrangements: confirmation that the 25 drop off bays will be satisfactory in meeting the demand of the school, and how parents of pre-school students, and those of both pre-school and primary school students can be accommodated.
- Mode share targets: concern that the mode share targets for walkers is too high as compared to surrounding schools, and the surrounding road and footpath infrastructure may need to be upgraded to support the mode share targets.
- Bicycle infrastructure: The Department requested that the Proponent addresses Council's concerns regarding the provision of cycling infrastructure surrounding the site.

Applicant's Response

Drop off/Pick Up Arrangements

In relation to the drop off and pick-up arrangements, the design has taken into consideration the operational periods of both the pre-school and the primary school in appointing appropriate parking restrictions to account for both pick up and drop off needs. As it is expected that the parents of pre-school students cannot utilise the drop off bays due to the different drop off and sign in requirements of their younger children and pre-schools, the proposed parking restrictions along Burnside Drive will consider the operational periods of both the pre-school and the primary school and establish longer permissible parking periods outside of the peak primary school pick-up/ drop-off period to cater for the longer stay for pre-school parents/ carers.

The exact operational hours will be finalised prior to the school's opening, in consultation with the NLPS Principal and pre-school operator.

Further, in circumstances where parents or carers may be picking up both a student from pre-school and primary school, it would be required the parent/ guardian park on-street outside of the pickup and drop off zone and walk into the school. It is likely that school students with siblings in preschool would potentially attend before and after school care and that drop off/pick ups would align and occur outside of the school peak times.

The timing for the pick-up and drop off zones outside the school have been informed by a comparison to Linfield Primary School, based on school size and mode share amounts, and adjusted accordingly. The pickup/ drop of area will be sign posted as 'No Parking', this signage relates to restrictions of dwell times of up to two minutes and that drivers cannot leave their vehicles. It is expected that dwell times will be much less than two minutes, however, conservatively based on a two minute dwell time there is sufficient space provided.

Mode Share Targets

The Department raised concerns that the mode share target of 50% for students walking to school was too high, given the figures from surrounding schools.

The walking mode share of 50% as referred to in this comment refers to the baseline student walking mode share. This has been assessed based on existing student depersonalised residential data and walking catchments, with details provided in the Student Transport Plan. Subsequent 60% and 70% walking rates are targets deemed achievable based on proposed walking and cycling infrastructure upgrades. For conservativeness, the traffic

modelling in the TIA has adopted the baseline mode share only without tempering the assessment with the projected student mode share targets.

The higher (80%-90%) staff car mode shares for Liverpool West Public School and Liverpool Public School are attributed to high on-site parking provision and on-street parking availability, and tandem-style parking, respectively. NLPS does not and will not provide a similar experience for staff, with on-site parking to be limited (and an allocation system to be provided). For reasons outlined in Section 5.1.6 of the TIA, a lower staff car mode share is achievable.
Further, the Department raises concerns about the surrounding footpath and road infrastructure and its ability to accommodate such high walking targets for students, particularly in relation to the roundabout on the northern side of the school, the footpaths on Lachlan Street and the existing traffic movements surrounding the site.

The Student Transport Plan analyses the projected volumes of pedestrian travel and undertakes a Fruin Level of Service assessment, quantitatively demonstrating suitability of footpath widths along Lachlan Street, with recommended widening along the Lachlan Street frontage proposed to attain the “reach” scenario of 70% student walking mode share. However, in the interim, the Fruin Level of Service assessment demonstrates suitability/ capacity of the existing footpath infrastructure up to and including the “moderate” mode share target (60% walking) which represents the interim mode share target.

Aside from the footpath widening, other measures including additional refuge islands on Forbes Street and Drummond Street, school crossing on Lachlan Street, and the widening of the footpath on Burnside Drive are proposed prior to the school opening.

The following strategies have been suggested in the Student Travel Plan submitted with the EIS to promote active and public transport travel and discourage private car travel. These include:

- Implementing a travel coordinator.
- Hosting Ride to School Day.
- Hosting a walking buddy program.
- Hosting Walk Safely to School Day.
- Encouraging staff carpooling.
- Encouraging a parent’s carpooling initiative.

Bicycle Infrastructure

The Department has requested that the Applicant address Liverpool City Council’s concern regarding the provision of cycling infrastructure surrounding the site. As part of the Student Transport Plan lodged with the EIS (Pages 38-40), a review of the existing cycling network within the school catchment has been conducted, and various recommendations for extension of the existing facilities (in line with the proposed cycle paths as per the Liverpool Bike Plan) have been outlined. SINSW will collaborate with Council to prioritise and deliver these opportunities.

3.5 Design

Issue

The Department and the NSW Government Architect (GANSW) raised a number of concerns relating to the design of the building and a number of design choices, including the full height glazing on the western façade, details of the future east-west link from the primary school to the high school and the removal of breakout balconies on level 01.

Applicant’s Response

In response to the full height glazing on the western façade, 500mm deep vertical and horizontal sunshades have been provided to the Western façade which will work to mitigate any heat impacts resultant from the orientation of the school. Specifically, these sunshades will work with the ratio of 30% performance glazing to 70% solid façade to achieve a compliant Solar Heat Gain Coefficient of 0. 6. Further, Mid-Summer shading studies on the Western Façade show that the horizontal projections of the eaves provided on the western façade further mitigate midday sun into west facing spaces.

The New Primary School SSDA proposal provides the opportunity for an east / west site link from the primary school to the high schools in the west. This link will be provided in the landscape to the south of the building. This aligns with the east / west site link identified by the Liverpool Innovation Precinct Masterplan.

Finally, GANSW raised concern regarding the removal of the breakout balconies on level 01, and the impact of having only one outdoor learning space as a result. Outdoor learning areas previously shown as balcony projections were not required to achieve EFSG compliance and have since been removed in consultation with the users. The design provides a 330mm Covered Outdoor Learning Space required for a Core 35 school and an additional covered open area of around 70m^2 adjacent to the northern home bases facing Lachlan Street on Level 2.

3.6 Archaeology

Issue

The Department and the Heritage Division of the Department of Premier and Cabinet note that the site is identified as having moderate archaeological potential, and that archaeological excavations were to be conducted on site in June 2021. The Department requested that evidence and results from the excavation be provided once undertaken.

Applicant's Response

Due to Covid-19 restrictions and lockdowns across Greater Sydney, the archaeological testing was delayed. However, the investigations for Aboriginal heritage has now been completed and the findings report is currently being prepared and will be completed shortly. It is also noted that the site has been registered on the Aboriginal Heritage Impact Management System (AHIMS).

4.0 Design Refinements to the Proposed Development

Since exhibition, a number of amendments have been made to SSD 10391 as part of design development refinement and to address the issues raised in the agency submissions. The key changes are summarised below:

- Reduction of overall building footprint.
- Minor design refinements, including:
  - Relocation of southern egress stair further west following BCA review.
  - Consolidation of Plant area to ground floor (south west of building)
  - Additional Storage Room to Level 2 above Special Programmes Rooms on L1 (previously double height space)
  - Delivery of the pre-school as 'Cold Shell', excluding fit out.
  - Setback to Lachlan Street entry link (L1 & L2) reduced.
  - Building height reduced from 14.8m to 14m top of roof.
- Landscaping changes, including:
  - Removal of east / west site link to the south of Administration building
  - Additional tree planting, and amendments to tree planting schedule.
  - Replacement of pest tree species with more appropriate trees.
- Minor adjustment of building services

Amended Architectural Plans (refer to **Appendix B**) and Amended Landscape Plans (refer to **Appendix C**) have been prepared reflecting these changes.

It is noted that the proposed changes do not result in a significant alteration to the description or numerical summary of the previously submitted EIS.

5.0 Additional Information and Assessment

This section provides an additional assessment of the proposed development (as refined) against the relevant matters for consideration under section 4.15(1) of the EP&A Act. The assessment is supplementary to and should be read in conjunction with the original environmental assessment provided in the EIS prepared by Ethos Urban and dated 22 June 2021.

5.1 Environmental Planning Instruments

The proposed development's consistency and compliance (as refined) with the applicable statutory plans and policies remains unchanged from that which was assessed in the EIS prepared by Ethos Urban and dated 22 June 2021. Therefore, the proposal does not require any further assessment against the strategic plans, state or local legislation as provided in the EIS.

5.2 Design Changes

The key design changes proposed as part of this RTS application are minor, and generally relate to ongoing design development of the school building and seek to respond to comments raised by GANSW, discussed further in the RTS Detailed Response Table at **Appendix A**. These changes include:

- A reduction in the overall footprint of the building.
- The relocation of the southern egress stair further west following a review by the BCA team.
- Consolidation of plant area on the ground floor, in the south-west of the school building.

- Provision of an additional storage room on level 2, above the Special Programmes Room on level 1, which was previously a double height space.
- Delivery of the pre-school as a cold shell, with fit out not included in this application.
- Reduction in setbacks to Lachlan Street entry link (on both level 1 and 2).
- Removal of the through-site link to the south of the administrative building.

These minor changes are as a result of ongoing design development, and do not substantially change the design, layout or intended use of the school. The design changes do not require any additional environmental assessment, as they either do not alter, or have a reduced impact on the key issues, including:

- Overshadowing and built form impacts.
- Amenity of the school
- Impacts to surrounding residential receivers
- Transport and accessibility
- Built heritage and archaeology
- Noise and vibration
- Biodiversity
- Stormwater, civil design, drainage and flooding

The changes are incorporated in the Amended Architectural Plans at **Appendix B**.

It is noted that the through site link to the south of the administration school building is proposed to be removed as part of these plans. This through site link was previously included on the ground floor to the south of the administration block to provide direct access to the western portion of the site. However, ongoing design development has required the removal of this through site link. This will not have a significant impact on accessibility to the western portion of the site, including the high schools beyond, as the landscaped through site link to the south of the school building will still be provided, ensuring accessibility to the site high school site.

5.3 Landscaping Changes

The following landscaping changes are proposed, as a result of the ongoing design development of the project:

- Additional tree planting at the north entry area.
- Outdoor Learning Area adjusted to reflect updated lift and staircase design changes.
- Removal of proposed tree in Nature Play Area to reflect staircase design changes.
- Additional Tree at south of courtyard due to relocation of southern staircase.
- New outdoor Covered Learning Area adjacent to southern façade of western building.
- Adjusted Kitchen Garden due to relocation of rainwater tank inside the building.
- 4 Chinese Tallow Trees (Sapium sebiferum) replaced by 2 Tulip Trees (Liriodendron tulipifera) plus 2 London Plane Trees (Platanus acerifolia)
- Removal of the east/west through-site link to the south of the school building

These changes are as a result of ongoing design development and do not result in any changes significant alterations to the approved development. The proposed changes to the landscaping will not have any impact on the overall unencumbered play space provided per student and will not significantly alter the previous environmental assessment of the landscaping.

Amended Landscape Plans are provided at **Appendix C**.

6.0 Mitigation Measures

Since the exhibition of the EIS, the mitigation measures have been amended to respond to the Department's queries and correspond with the updated proposal and supporting documentation. Refer to **Table 1** below.

Table 1 Amended Mitigation Measures

Mitigation Measures
Aboriginal Heritage The following mitigation measures are proposed: • Aboriginal archaeological test excavations should be undertaken to determine the nature and extent of any subsurface archaeological deposit. This should be undertaken in consultation with the Registered Aboriginal Parties prior to construction of the NLPS. The testing should be undertaken in accordance with the Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales. • Aboriginal community consultation should continue throughout the archaeological testing and the life of the project. • As requested by the Registered Aboriginal Parties, any artefacts uncovered should remain on country and be catalogued and stored onsite and protected by SINSW. The artefacts could be used in an interpretive display. It will be necessary for a Care Agreement to be made between SINSW and the Registered Aboriginal Parties. To apply for a Care Agreement, an 'Application for the transfer of Aboriginal objects for safekeeping' must be signed by SINSW and the Registered Aboriginal Parties and submitted to the Department of Planning, Industry and Environment. • Interpretation of Aboriginal archaeology and history of the site should be undertaken in consultation with the Registered Aboriginal Parties. An interpretation strategy and plan should be developed in consultation with the Registered Aboriginal Parties to guide the interpretation. • Archaeological testing is to be undertaken on site as soon as is possible.
Noise and Vibration The following construction noise mitigation measures are proposed: • A detailed Construction Noise and Vibration Management Plan should be prepared, which details the following: – Identification of nearby residences and other sensitive land uses – Description of approved hours of work – Description and identification of all construction activities, including work areas, equipment and duration – Description of what work practices (generic and specific) would be applied to minimise noise and vibration – A complaint handling process – Noise and vibration monitoring procedures – Overview of community consultation required for identified high impact works. The following operational noise mitigation measures are proposed: • Acoustic louvres to all condenser plant rooms. Acoustic louvres are to have the minimum transmission loss outlined in the Acoustic Report at Appendix P of the EIS. • Internally lined ductwork comprising minimum 2 metres straight duct and one bend to be applied to each condenser unit discharge. Internal lining to be minimum 50 mm thick. • External plant room walls and roofs, with the exception of acoustic louvred area, to have a minimum Rw 40 acoustic performance • Incorporation of building envelope design and materiality that reduces noise impacts. Consider PA speaker location and direction, and operational choices of the PA system, including volume and the amount of speakers.
Aviation AviPro suggests the following mitigation measures, as per Appendix CC of the EIS. • A flight path survey should be conducted of the realigned northern flight path. This will include the NLPS building site area. • The mobile crane for the NLPS site will need NVG compatible lighting. • Some additional risk management notification activities including HLS Notification and additional OzRunways information will be required to ensure HEMS operators are fully apprised of the crane hazard in the vicinity of Liverpool Hospital's HLS during the construction phase. • The mobile crane will need to be lowered below RL40.00 during periods of darkness and when the site is not operational.
Flooding Meinhardt/Bonacci recommend the following mitigation measures in relation to flooding: • The FFL of the school is to be set at minimum RL 9.3 • Evacuation – provide reliable access for pedestrians during flood events towards west of the site (Liverpool Boys High School area).

Mitigation Measures

- Building components – ensure the flood compatibility of the building components.
- Structural soundness – ensure the resilience of the structure to withstand forces of flood water, debris, and buoyancy.
- Flood effects – ensure the non-worsening of flood levels, flood storage, velocities etc.
- Car parking and driveway access – maintain the freeboard for surface level car parks and the inundation of basement carparks.
- Management and design – ensure compliance with the DCP
- Fencing – include construction of fencing to not obstruct flows.
- ***An Emergency Evacuation Plan is to be prepared to ensure the safe evacuation of students and staff in flood scenarios.***

Construction Traffic Management

GTA recommends the following mitigation measures, as per Appendix G of the EIS.

- All vehicles will enter and leave site in a forward direction;
- All vehicles will be accepted directly into the site with no vehicles staging on the public roadways;
- Major deliveries will be restricted from the school peak drop off and pick up times, i.e. no movements between 8:00am to 9:30am and 2:30pm to 4:00pm on school days;
- Where achievable, vehicles will be restricted to Medium Rigid.

Operational Traffic Management

The management of traffic is to occur in accordance with the Student Transport Plan, and the following are to be undertaken:

- Implement a right-turn ban for the Forbes Street approaches of the intersection during the AM peak period
- Replacement of refuge islands at Lachlan Street/Forbes Street intersection
- Delivery of off-road cycling infrastructure
- Investigate delivery of the new signalised pedestrian and cyclist crossing at the intersection of Lachlan and Macquarie Street.
- Widening the existing footpath on Burnside Drive to 2.5 metres (subject to a separate planning approval) to accommodate the increased pedestrian volumes.
- A new school crossing on Lachlan Street between Drummond Street and Lachlan Lane to facilitate pedestrian connectivity across Lachlan Street. A new crossing supervisor will be engaged by the school to operate this new crossing.
- A new pedestrian refuge island on the north approach of the Lachlan Street/Forbes Street intersection to improve the east-west pedestrian movement across this intersection.
- Extension of the existing school zone along the length of Burnside Drive.

Heritage

In line with the Statement of Heritage Impact at Appendix S of the EIS.

- The site does contain historical archaeological potential dating to the late 19th century. It will therefore be necessary to undertake an historical archaeological assessment to determine whether evidence of the late 19th century subdivision and cottages could be located on the property.
- If necessary, a methodology should be developed to undertake historical archaeological testing.

In line with the Archaeology Assessment at **Appendix X**:

- Archaeological test excavations and salvage should be conducted to establish the presence of evidence of the former occupation sites highlighted in the Historical Archaeological Assessment.
- Monitoring of areas of archaeological potential which may be impacted upon by the proposed redevelopment should also be undertaken when ground clearance is occurring.

Waste

The Waste Management Plan at Appendix AA of the EIS identifies that a detailed Waste Management Plan should be prepared to:

- Inform the development of a detailed CWMP for the Construction Certificate application, which is to include details regarding disposal and recycling of different materials expected from demolition, construction, and the transport and destinations of these materials.
- Provide guidance that detailed design and fit-out of the building is consistent with best practice standards and plans for waste management, and
- Inform all plans and procedures for operational waste management.

Social Impact

The following mitigation measures are identified by Ethos Urban at ~~Appendix W of the EIS~~ ***Appendix D of the Response to Submissions prepared by Ethos Urban***.

- Monitoring and management of impacts in collaboration with key stakeholders, to effectively address them if/or when they arise.

Mitigation Measures
• Mitigation of potential construction impacts through compliance with a comprehensive Construction Management Plan, with a communication plan recommended to be developed to ensure all neighbours and relevant parties are informed about the development. Safety for students, staff, visitors, and residents is to be effectively managed, through comprehensive security management plans and crime prevention strategies during both the construction and operational phases.
Concurrent Works In order to ensure that works being undertaken under separate applications are completed, it is required that a condition of consent be included that requires the works outlined in Section 1.2.2 are complete prior to the school being operational.

7.0 Conclusion

The applicant and project team have considered all submissions made in relation to the public exhibition of the proposal. A considered and detailed response to all submissions has been provided within the accompanying documentation.

In responding to and addressing the range of matters raised, the proposal has been refined pursuant to Clause 55 of the *Environmental Planning and Assessment Regulation 2000*.

We trust the response provided will enable the Department to finalise their assessment of the SSDA. Given the environmental planning merits (and the ability to suitably manage and mitigate any potential impacts) and significant public benefits proposed, it is requested that the Minister approve the application.