ETHOS URBAN

28 February 2020

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Jason Maslen
Team Leader
School Infrastructure Assessments
NSW Department of Planning, Industry and Environment
320 Pitt Street, Sydney 2000

Dear Jason,

RE: RESPONSE TO SUBMISSIONS YOUNG HIGH SCHOOL LIBRARY AND JOINT-USE COMMUNITY FACILITY (SSD-9671)

The Environmental Impact Statement (EIS) for Young High School Library and Joint-Use Community Facility was publicly exhibited for a period of 28 days, concluding on 10 December 2019. During the exhibition period, nine submissions were received from members of the public and non-government organisations, while four submissions were received from government agencies. An additional two submissions were received after exhibition ended, along with additional information to support the original submission made by the Young Community and Residents Association.

The Department of Planning, Industry and Environment (DPIE) has also prepared a letter setting out additional information and clarifications required prior to final assessment of the project. The proponent, School Infrastructure NSW (School Infrastructure) and its specialist consultant team have reviewed and considered all issues raised in the submissions and DPIE's letter.

The most common issues raised were in relation to the consultation process, the location of the new building, and heritage and archaeological considerations.

This letter, prepared by Ethos Urban on behalf of the proponent, sets out the responses to the issues raised in accordance with Clause 85A of the *Environmental Planning and Assessment Regulation 2000* (EP&A Reg). The response relates to clarification of certain elements of the proposal and the provision of additional technical assessment to address issues raised. The description of the proposed development remains the same as originally sought.

A detailed response to each submission is provided in the response table below, as well as the request for further information from DPIE. The letter should be read in conjunction with the following attached documentation:

- Amended Existing/Demolition and Signage Plans prepared by Hayball (Attachment A);
- Amended Selected Pages from Design Report prepared by Hayball (Attachment B);
- Amended Tree Removal and Protection Plan prepared by 360 (Attachment C);
- Amended Social Impact Assessment prepared by Ethos Urban (Attachment D);
- Amended Heritage Impact Statement prepared by GML (Attachment E); and
- Ground Penetrating Radar Results prepared by Patterson Building Group (Attachment F).

We trust that this information is sufficient to enable a prompt assessment of the proposed development. Should you have any queries about this matter, please do not hesitate to contact me on 9409 4932 or jdwyer@ethosurban.com.

Yours sincerely,

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YOUNG HIGH SCHOOL LIBRARY AND JOINT-USE COMMUNITY FACILITY RESPONSE TO SUBMISSIONS AND REQUEST FOR ADDITIONAL INFORMATION AND CLARIFICATIONS

Name	Туре	Issue	Response				
Agency Submission	ns						
Department of Planning, Industry and Environment (DPIE)	Comments	Provide an updated Social Impact Assessment that is marked as final (the version provided with the EIS is marked as a draft) and which gives further consideration to the impact of the relocation of library outside of the town centre, particularly to older persons, and measures to mitigate any negative impacts.	An updated Social Impact Assessment is provided at Attachment D . The SIA provides further consideration of the potential negative impacts of the library relocation and mitigation measures at Section 5.2. Proposed mitigation measures include active communication with library members and the community, ensuring there is adequate car parking, providing transport connections to the town centre, and providing appropriate wayfinding signage.				
		Provide further information in relation to the accessibility of the new site for the library, particularly to older persons, including further details regarding the community bus proposed to service the site.	The library has been designed to provide accessible access from the western car park and Campbell Street through Carrington Park along Currawong Walk, as well as from within the school for staff and students. Access to the site will be provided by a community bus as described within the EIS. The community bus will be integrated with existing services that are provided by Young and Boorowa Community Transport. Current services include pick up from homes between 9:00am - 1:00pm and 2:00pm – 4:30pm within the Young Township, and 9:30am returning 1:30pm from Boorowa to Young.				
			Further information regarding the existing services can be found at the following link: https://youngboorowa.cccsl.org.au/ The continuity is excitable by Covernment Spannered Voyabor for Papaignered				
			The service is available by Government Sponsored Voucher for Pensioners and Disabled. Hilltops Council has committed to reviewing demand for further services and the costs of such a service once the library has opened.				
		Provide updated plan(s) that more clearly detail the location and configuration of the proposed external identification signs.	Revised signage plans are provided at Attachment A along with pages from the Design Report which clarify the location and design of the signage (Attachment B). The revised plans provide further clarification regarding the location and configuration of the proposed signage.				
							Address the comments made by the Heritage Council of NSW.

Name Type	Issue	Response
	Provide further details in relation to the risks identified in the Road Safety Audit and proposed measures to mitigate these risks. This should include consultation with Council in relation to the need / provision of pedestrian crossing upgrades on Campbell Street and actions to address student / parent drop-off and pick-up behaviours on roads surrounding the school.	The Road Safety Audit has been reviewed by Hilltops Council. The following responses are provided to the various identified risks including mitigation measures where appropriate. Pedestrians crossing Campbell Street At this location the former RMS provided funding to install kerb blister treatment in 2010 adjacent to the school's pedestrian gate, to reduce the width of pavement for the students to cross. The width of each travel lane is 4m. Pedestrian fencing is installed to funnel the pedestrian movement to the kerb ramps. There was also an undertaking that Young High School would generally keep the vehicle access gates closed to direct students in the school grounds to the pedestrian gate. The 12 primary school children observed crossing at this location would likely have walked from Young Public School (located approximately 500m to the south) to this point. Young Primary School has a controlled school crossing with crossing guard on the Olympic Hwy at the Allanan Street intersection for use by students. Students should cross at this location, then walk down the eastern side of Campbell Street. The last 5 years of Transport for NSW (TfNSW) Crash Data indicate no incidents. Refer to TfNSW for further information through Hilltops Council LTAC. Pedestrians crossing Berthong Street Hilltops Council is seeking funding from the upcoming Walking and Cycling Program 2020/2021 for the provision of a concrete footpath from the Berthong Street pedestrian gate to Campbell Street intersection at the kerb blister threshold facility. Council had recently installed a kerb blister threshold treatment at the Berthong Street pedestrian sate to Sampbell Street. The last 5 years of TfNSW Crash Data indicate no incidents. Pedestrians crossing Ripon Street In 2014 Hilltops Council removed the pedestrian crossing and installed a kerb blister and centre refuge threshold treatment in Ripon Street at the intersection with Campbell Street. TfNSW has Safety Around School officers for the purpose of educational support to schools and

Name	Туре	Issue	Response
			Unsafe Vehicle Movements: Campbell Street NSW Police monitor driver behaviour in Campbell Street adjacent to Young High School that act contrary to the Australian Road Rules (ARR) 2014 as Amended.
			Berthong Street NSW Police monitor driver behaviour in Berthong Street adjacent to Young High School that act contrary to the Australian Road Rules (ARR) 2014 as Amended.
			Funding for the above mitigation measures could be sourced from TfNSW. When the Library and Community Facility is open to the public, monitoring of pedestrian and traffic movement for the initial 12 month period would provide valuable information as to how the new facility is operating and where if any, pedestrian and or traffic issues may occur.
		Confirm the number of parking spaces to be provided in the Carrington Park car park as the plans and EIS include inconsistent information.	32 car parking spaces are proposed with one additional loading/service vehicle space, as documented in the Architectural Drawings and the EIS. The Traffic Impact Assessment submitted with the EIS calculated that the new facility would require 27 spaces be provided, which the 32 proposed spaces satisfies.
		Confirm the number of trees to be removed as part of the proposal (Section 3.4 of the EIS report and the demolition plan indicate that 22 trees are to be removed whilst the Appendix X states that 23 trees are to be removed).	23 trees are proposed to be removed. A revised Demolition Plan is provided at Attachment A which identifies all trees to be removed. A revised Tree Protection and Removal Plan is also provided at Attachment C .
DPIE – Biodiversity and Conservation Division	Comments	BCD have reviewed the EIS and accompanying Flora and Fauna report by NGH Environmental. We are satisfied with the reports and have no further biodiversity comments at this point in time.	The comments are noted.
		We support the commitment in the EIS for the proposed development works to be undertaken in accordance with the Aboriginal Cultural Heritage Assessment Report (ACHAR) prepared by GML and dated October 2019. The recommendations outlined within the ACHAR should be incorporated into the conditions of approval for the project. We suggest the preparation of an Aboriginal Heritage Management Plan also be included as a condition of approval to assist with management of the Aboriginal cultural heritage values of the site over the life of the project.	Noted.
	Comments	The EPA notes that predicted construction noise levels will exceed management levels for several nearby sensitive	The mitigation measures recommended in the Acoustic Assessment submitted with the EIS will be adopted.

Name	Type	Issue	Response
NSW Environment Protection Authority (EPA)		receivers even after implementing noise control measures, including people using Carrington Park, the TAFE childcare centre and 15-17 Caple Street. The management levels may also be exceeded at St Mary's Catholic Church and Hennessey College. Due to the predicted noise impacts on the surrounding community, the EPA advises that it is critical for the proponent to implement all reasonable and feasible noise control measures at the site, including (but not limited to) the measures suggested in Table 10 of the report prepared by Marshall Day Acoustics and dated 25 September 2019. In addition, the proponent should establish a consultation and notification strategy with all sensitive receivers. The proponent should ensure that these receivers are made aware of where to get project details, and what avenues they can take if they have any questions or complaints. Should works be undertaken outside of recommended standard construction hours, the EPA recommends that the proponent prepare a noise impact assessment to quantify out of hours construction noise impacts and identify all feasible and reasonable work practices and noise mitigation. The EPA recommends that the assessment be prepared with due regard to the Interim Construction Noise Guidelines (DEC, 2009).	Notification and consultation with surrounding sensitive receivers will be undertaken during construction. The Principal Contractor will be required to prepare a construction and environmental management plant, which will include management of noise and vibration in accordance with any requirements as set out in the Acoustics Report submitted with the EIS, as well as any other necessary works (reports or monitoring) to meet their obligations. This plan will include a noise notification, consultation and complaints handling procedure.
		The EPA notes that the EIS identifies that the building waste may contain hazardous materials, such as asbestos, lead based paint, and PCB capacitors. The EPA advises that these materials should be classified in accordance with the Waste Classification Guidelines and disposed at a facility that can lawfully accept them.	If found, hazardous materials will be classified in accordance with the Waste Classification Guidelines and disposed at a facility that can lawfully accept them.
		The EPA notes that stormwater on site is proposed to be captured in a collection system and have a controlled discharge to the street drainage system. This discharge location is proposed to be to a stormwater network in Campbell St which eventually drains into the Burrangong Creek catchment. The EPA advises that in accordance with section 120 of the	As clarified by Northrop, Stormwater impacted by construction activities will fall under the contractor's responsibility to adhere to the sediment and erosion control directives outlined in the plans and specifications provided by Northrop with the EIS, the 'Blue Book' and any other relevant guidelines. It is also noted that during construction there is no collection of runoff and discharge to the street, a sediment fence is required to treat surface runoff, and there is a grassed public park downstream. Therefore, the chance of polluting the receiving waters is highly unlikely.
		Act, it is an offence to pollute waters. As such, the EPA recommends that the proponent consider all reasonable and feasible measures to reuse stormwater impacted by construction activities and ensure that any discharge offsite does not cause pollution to waters.	The proposed stormwater management for the site is in accordance with Hilltops Council's development requirements. To manage discharge quantity an OSD tank has been designed which maintains pre-development discharge rates. The land use is remaining similar, and the increase in impervious area

Name	Туре	Issue	Response
			is primarily roof area (i.e. not polluted). Therefore, the runoff quality should not be adversely affected by the development. There are no specific water quality targets stipulated in the DCP. This has been adequately addressed in the stormwater management report.
Heritage NSW	Comments	The site is not currently listed on the State Heritage Register (SHR). However, a SHR nomination for this site is currently being processed by Heritage NSW. As part of this process the Heritage Council of NSW has assessed this nomination and resolved that the Carrington Park Precinct is potentially of State heritage significance due to its association with the Lambing Flat Anti-Chinese Riots.	The SHR nomination is noted. The nomination curtilage applies to a portion of the heritage study area defined by GML in their studies provided alongside the EIS, as well as across Campbell Street to the east. Refer to image below showing proposed curtilage. Initial heritage reports submitted with the EIS did identify the racist nature of anti-Chinese riots and identified the site as being of State significance. However, to further acknowledge the association, an amended Heritage Impact Statement has been provided which includes revised Statements of Significance, making greater reference to the riots' role in racism in Australia (Attachment F). The curtilage and significance as per the SHR nomination have been considered in the amended heritage documentation.
		It is unclear from the impact assessment in the HAA how the testing was used to guide and amend the current SSDA design, in particular for the New Block NN landscaping (GML 2019, p73). The current proposal advises that the landscaping proposed for New Block NN (p.73) would be monitored, but should intact State significant archaeology be identified, a	Archaeological input in the SSDA design was provided during early stages of the project. An Archaeological Management Plan (accompanying document to the Conservation Management Strategy) based on the results of detailed desktop assessment informed the location selection of the new library building.

Ethos Urban | 218064 7

Name	Туре	Issue	Response
		program of design review would be undertaken. Redesign of an SSDA may be difficult to accommodate at a later point in the project delivery, and earlier investigation may be warranted here. Earlier staged investigation for the New NN Block landscaping may be beneficial to guide the design in this area. This would also enable a better approach to manage the risk of Significant finds resulting in increased cost and time delays for the project.	The archaeological testing (historical and Aboriginal) clarified locations with archaeological remains and sensitivity zones. Some locations were downgraded to a lower archaeological potential. There were no further considerations for the SSDA design than previously identified. Testing confirmed that Block NN landscaping area is unlikely to contain State significant archaeology associated with the police camp and riots. However, as noted elsewhere in the testing, displaced artefacts and remnant features may be present. There is also an area of Aboriginal archaeological potential located below fills in a localised area associated with the new landscaping. Monitoring is proposed for both archaeologies as a precaution. The siting and form of the proposed Block NN has been designed in response to a number of factors, one of which was minimising potential archaeological impacts. Constraints to note are that access is limited due the required ongoing school operation. Heritage NSW and Council policy is that State significant archaeology be conserved and not impacted by development. The design review process in
			the HAA reflects this.
		The HIS fails to completely fulfil the SEARs heritage requirements on two fronts: • it does not identify what noise and vibration impacts the proposal will have on surrounding heritage buildings and	An amended HIS has been provided that draws on the acoustic assessment provided with the EIS (Attachment F). The HIS considers that the noise and vibration impacts of construction and vibration can be appropriately mitigated.
		 provide appropriate mitigation measures; it does not provide full consideration of the intangible significance of the remnant landscape in relation to the riot event. 	The HIS has addressed all requirements for the locally heritage listed items contained within and surrounding the site. Further research and assessment would be required to develop a complete social history/values assessment for the site, which would relate to the SHR nomination. Landscape values are discussed within the HIS and the potential for impact has been considered (e.g. Table 6.6). The interpretation plan would investigate how the riot event should be interpreted in the landscape.
		Generally, the HIS and EIS undervalue the intangible significance of the site and the importance of the riot and battle event here in NSW and Australian history. Simply referring to the place as 'the site of the Lambing Flat riot of 1861 where the Riot Act was read' is not enough. Consideration of the event and how it links to the remnant landscape and topography is required. Generally, GML have confined consideration of the State heritage significance values of the site to its archaeological reports. Landscape	An amended HIS has been provided at Attachment E . The amended HIS includes revised Statements of Significance that include greater reference to the riots' role in racism within Australia. In addition, landscape values are discussed within the HIS and the potential for impact has been considered (e.g. at Table 6.6).

Name	Туре	Issue	Response
		values of the place should be considered in the HIS, as well as how the remaining elements of the place can assist in telling the story of the event. The HIS and CMS suffer from strictly separating the assessment of the two sites, Young High School and Carrington Park, whereas they should be considered together in the context of the riot event. They are two parts of this story and should be considered together. Amendment of the EIS and HIS is required to fully confront and recognise the State significant event that occurred here.	
		The EIS does not include the Archaeological Management Plan that is referenced throughout the HIS.	The AMP is a document prepared for SINSW and Young High School to guide development planning for this project and archaeological management in general. The information in this document has mostly been integrated in the archaeological reports provided with the EIS. As such, an amended HIS has been provided at Attachment E , in which references to the AMP have been updated to reference the Historical Archaeological Assessment and Research Design (HAARD).
		Heritage NSW notes that the proposal, and particularly the demolition of Block BB, will result in the reinstatement and improvements of views of the Great Courthouse (Block AA) from Carrington Park and the surrounding streetscapes. Heritage NSW does not object to the demolition of this building and this heritage outcome. The New Block NN respects the reinstated views of the Great Courthouse (Block AA) with appropriate graduated setbacks. It is also sympathetic to the Great Courthouse (Block AA) through limiting its height to the gutter line of this building and mimicking the scale and mass of the portico columns across its front facade.	Noted.
		Heritage NSW supports the reinstatement of the former Currawong Street as the new Currawong Walk as part of the landscape design. This walk and the additions to the pathways within Carrington Park are consistent with the historic design of this park. However, it is unclear how the proposed curvilinear landscape design within the New Block NN forecourt is consisted with the historic landscaped garden design of the Great Courthouse (Block AA).	There are a number of considerations at the site, both within and outside of the historical overlay, which the design needs to respond to. The outcome is a considered approach to balance all of these considerations, which include: • Arboreal requirements to avoid construction within the TPZ of retained heritage listed trees; • Indigenous heritage and narrative; • Design response to the landscape function as a civic forecourt and to support school use requirements; and • First principle design considerations - access, circulation, security and stormwater drainage.
			The design for the forecourt is sympathetic to the Great Courthouse (Block AA) building and its past, providing a grand symmetrical paved arrival aligned with the heritage gates and stairs, flanked on either side with formal gardens beneath the retained heritage listed Hoop Pines (Araucaria cunninghamii).

Name	Туре	Issue	Response
			The garden then transitions from strong linearity to an organic geometry which is complementary to the new Block NN and local indigenous history.
			Currawong Walk represents the early European influence and history of the site, coupled with retention of culturally and historically significant trees and fences. The organic, curvilinear geometry pays reference to the indigenous history of the site and its people. The Wiradjuri are the largest Aboriginal nation in the area of what is now known NSW land of the three rivers. Within this catchment, Young's primary source is the Burrangong Creek. According to indigenous culture, Burrangong is the life force of the area - a meandering water course which means 'meeting place'. Additionally, 'unlike western concept of linear and measured time, wiradjuri time is circular'.
			The playful curves of the landscape represent the flowing tributaries of the Burragong, a continual/non-linear journey through time. The pocketed spaces created by the meandering path form 'meeting' places within the landscape, including the Public Library lawn, student lawn, and Wiradjuri outdoor learning space.
			The geometry of the landscape has also been informed by the existing heritage trees identified for protection, and their Tree Protection Zones (TPZs) within which construction and excavation is not permitted. The landscape design responds to these non-construction zones and follow the radial TPZ's.
		Demonstration that the New Block NN is sympathetic and/or compatible with the Great Courthouse (Block AA): The EIS should demonstrate through a detailed analysis how the New Block NN will be sympathetic and/or compatible with the Great Courthouse (Block AA). This is part of ensuring that the New Block NN does not dominate this historic building. This should be accomplished through the inclusion of detailed design drawings (elevations and plans) of the relationship between the two buildings. These drawings should also compare and contrast the material selections and colour schemes of the two buildings.	Block NN has been located and designed to specifically respond to the former Courthouse, as well as indigenous heritage at the site. Key design decisions that were made for European Heritage (primarily the former Courthouse) include: • Proposed massing steps back to preserve historic sight-lines to the Courthouse and existing heritage setbacks on-site; • Scale of facade volumes are in proportion to the existing Courthouse; • Vertical facade language of the Courthouse columns are referenced in the facade articulation of the proposed joint use library; and • Height of Block NN has been limited to RL450, which was recommended by GML to preserve the visual importance of the Courthouse building.
			Further detail, including elevations, imagery and view lines are provided in the amended pages from the Design Report at Attachment B , including drawings from the conceptual design stage, of which an excerpt is shown below.

Name	Туре	Issue	Response
			PROPOSED ELEVATION E-W
		Investigation of the historic design of the Great Courthouse (Block AA) forecourt and landscape and incorporation into a revised landscape design: Historic photography shows that during the nineteenth century the Great Courthouse (Block AA) featured a formal landscaped garden. Considering the symmetrical design of the Great Courthouse (Block AA) it is likely that this formal garden was also symmetrical. Ideally, the new landscape design should reference or look to reinstate this formal garden design in whole or part.	As described above, the landscape design represents a balanced response to various site-specific considerations, including the former symmetrical design of the Courthouse garden. As previously described, the design for the forecourt intends to be sympathetic to the former Courthouse building and its past, providing a grand symmetrical paved arrival aligned with the heritage gates and stairs, flanked on either side with formal gardens beneath the retained heritage listed Hoop Pines (Araucaria cunninghamii). The garden then transitions from strong linearity to an organic geometry which is complementary to the new Block NN and local indigenous history.
		Investigation into how the riot event and the former Gold Commissioners Camp can be referenced in the New Block NN or landscape design: Considering the history of this site this proposal has a tremendous opportunity to incorporate references to the buildings and features of the riot event and Gold Commissioners Camp into the New Block NN and landscape design. This is part of recognising and celebrating the history of the place, as well as telling this important story to the public and students of Young High School.	The landscape design has identified opportunities and areas where meaningful interpretive information relating to the site's rich history can be incorporated. The footpath and paving of Currawong Walk has been identified to have text and illustrative representations of key historical events. The walk then provides a historical timeline on approach to Block NN. The concrete seating terraces also form part of this narrative, and continuation of the historical timeline. The intent is that on the front elevation of these terraces text is imprinted into the concrete. The final expression and content of the interpretive strategy will be developed further in conjunction with both the cultural and heritage consultants during Design Development. It is understood that preparation of an interpretation plan will likely form a condition of consent and is also a condition of the Section 140 archaeology permit works. As such, the proponent is investigating commencement of interpretation with the project team.
		The main EIS document should indicate whether it has accepted the recommendations of the HIS and HAA or not: Both these documents make sensible recommendations. However, it is unclear whether they have been accepted and actioned on by the project team in the current EIS.	The proponent will adopt the recommendations of the HIS (as amended) and the HAA.
Transport for NSW (TfNSW)	Comments	Section 5.6.4 of the EIS refers to 2 options for loading and servicing for the library. One of these options is the use of an existing drop-off zone located in Campbell Street. The drop-off	The loading zone on Campbell Street adjacent to Carrington Park (pickup/drop off service lane) was installed to provide an off-street area for school deliveries to be made. Previously, delivery vehicles would access the school

Name	Туре	Issue	Response
		zone is not to be used as a designated delivery zone. An alternative is the use of the carpark with access from Caple Street as this can be altered to provide facilities for a delivery loading/unloading area.	grounds. The reconfigured car park off Caple Street comprises a service/loading space for library deliveries. Therefore, the drop-off zone on Campbell Street will not be used as a designated delivery zone.
		Section 5.6.5 of the EIS indicates that pedestrian and cyclist infrastructure will remain open and mostly unaffected by construction activities. Appropriate measures should be implemented to ensure that pedestrian and cycling movements along footways and cycleways are maintained at all time during constructions activities. If the development requires closure of either facility, the Construction Management should detail adequate safety and diversion measures to be implemented to limit time delay and detour distances.	Noted. The construction contractor CMP will address the relevant issues when appointed. The proposal will not adversely impact existing pedestrian and cyclist infrastructure.
		The documentation identifies that 10 secure bicycle parking spaces to be provided, however the provision of end-of-trip facilities such as lockers and shower areas is not addressed. The inclusion of these facilities may encourage more active transport usage by staff. Bicycle parking facilities should be located in easily accessible locations and in line with Crime Prevention Through Environmental Design (CPTED) principles.	As part of the proposed development, the existing school library (Block EE) will be refurbished to include staff amenities including lockers and showers.
		TfNSW emphasises the need to minimise the impact of the proposed development on the existing road network and maintain the level of safety, efficiency and maintenance along the road network for road safety reasons. Recognition of the likely presence of vulnerable road users within and around the school grounds is required.	Noted.
Public and Organis	ation Submis	sions	
Young Community and Residents Association	Objects	Insufficient time provided to review documentation. An extension to the end of January (or further) is requested.	The Department of Planning, Industry and Environment is responsible for managing the statutory public exhibition process.
ASSOCIATION			All SSD development applications (DAs) must be exhibited for at least 28 days.
			 During the exhibition period, the Department will: Publish the DA and EIS online Make copies of the EIS available at the local council's offices and Service NSW centres Notify and advertise the public exhibition in accordance with the requirements in the Environmental Planning & Assessment Act 1979 and associated Regulation.

Name	Туре	Issue	Response
	Objects		The DA submitted by SINSW was exhibited in line with the SSD process between 13 November and 10 December 2019. Late submissions made in 2020 were also accepted and have been considered in this response. Further information on the SSD process and the requirements can be found on the NSW Planning Portal: https://www.planningportal.nsw.gov.au/major-projects/assessment/state-significant-development/ssd-process/exhibit-da
		Cabbage tree palms have been removed near the Courthouse. These trees gave profile to the town and provided a material historic social connection with the old Gaol (now the TAFE); the prisoners made hats from the palm leaves.	The removal of the Cabbage tree palms is unrelated to this SSDA. The aforementioned palms were removed in 2016 by the Energy Regulator as they were causing unscheduled blackouts.
		Courthouse and Gaol, and indeed that before the ends were blocked off. The Heritage report suggests that as they had no physical evidence, the expense of investigation might not be warranted. The expense is necessary and outweighs the potential costs of not performing the investigation.	Heritage NSW advised SINSW that a tunnel could exist in the school courtyard. Ground penetrating radar scans were completed in the area identified by Heritage NSW, however the scans showed no evidence of a tunnel.
			GHD subsequently met with community member Joe Kinsela who advised that the tunnels could be in an alternative location on the school grounds (as identified on the supplied map).
			Ground penetrating radar scans have been undertaken and there is no evidence of a tunnel within the areas scanned to a depth of 4m (refer to Attachment F). A complete report detailing the findings is currently being prepared at the request of Heritage NSW and will be provided to Heritage NSW separately.
			GML Heritage has confirmed that it is unlikely that a tunnel would have been constructed to transport accused from the former Gaol to the Courthouse.
			Site investigations have also been undertaken beneath the floor of the former Courthouse building which provided no evidence of a tunnel.
Daryl Close		that comprised over 2,200 signatures.	In the early stages of the project, it was proposed that the joint-use library and community facility be located on both the school, and within Carrington Park.
			The aforementioned petition was set up by the 'Friends of Carrington Park' group and gained 2,272 signatures from community members who did not support this footprint and did not want the joint-use library and community facility to be located within Carrington Park (Young Witness, 11/11/2019, Marilyn Stemm)

Name	Туре	Issue	Response
			In response to concerns raised in the petition, the location of the joint-use library and community facility was reconsidered, and the location was adjusted to be entirely within the Young High School boundaries with public access via Carrington Park.
		Hilltops Council have only allowed 1 week for viewing of the details of this project. Exhibition near the Christmas period also impacts the ability of members of the public to review documentation.	Refer to response above. The Department of Planning, Industry and Environment is responsible for managing the statutory public exhibition process.
		accumentation.	All SSD development applications (DAs) must be exhibited for at least 28 days.
			 During the exhibition period, the Department will: Publish the DA and EIS online Make copies of the EIS available at the local council's offices and Service NSW centres Notify and advertise the public exhibition in accordance with the requirements in the Environmental Planning & Assessment Act 1979 and associated Regulation. The DA submitted by SINSW was exhibited in line with the SSD process between 13 November and 10 December 2019. Late submissions made in
			2020 were also accepted and have been considered in this letter of response. Further information on the SSD process and the requirements can be found on the NSW Planning Portal: https://www.planningportal.nsw.gov.au/major-projects/assessment/state-significant-development/ssd-process/exhibit-da
Withheld	Supports	The concerns raised in a previous petition relating to the location of the facility within Carrington Park have been addressed by locating the facility fully within the existing school boundary.	Support for the proposal is noted.
		Young Town library is in need of refurbishing or replacement, and this is an opportunity that the town cannot afford to miss. There is a track record of successful joint ventures at Young District Hospital /Mercy Care and Young High School/TAFE. This project is supported by all our schools and many in the community, both private individuals and organisations. Council and the Department of Education have attended many of the community's concerns, specifically local heritage, disturbing Carrington Park and student security. The venture will benefit the town and local community.	Support for the proposal is noted.

Name	Туре	Issue	Response
Withheld	Supports	The concerns raised in a previous petition relating to the location of the facility within Carrington Park have been addressed by locating the facility fully within the existing school boundary. Extensive consultation has been made by the steering committee to develop a solution that protects the park.	Noted.
Marilyn Stemm	Objects	Lack of consultation provided on the final location of the facility.	In April 2018, Hilltops Council submitted a Business Case to the Regional Cultural Fund that considered three options, with funding being awarded to Hilltops Council for a purpose-built joint-use facility with Young High School as the preferred option based on the Business Case.
			The design, including the bulk, scale and location, has been informed by public consultation, as well as the need to respect the setting's European and Indigenous heritage and traffic considerations.
			Passive community feedback had been collected for several years for the need for an updated library service.
			The need for a new community library had been identified in the 2014 Cultural Infrastructure Masterplan commissioned by Young Shire Council prior to amalgamation with Harden and Boorowa Shires to the now known Hilltops Council.
			Following the signing of the MOU intensive engagement with the local community commenced about where the facility would be located and what it would include.
			In partnerships with SINSW, Hilltops Council held a community meeting in November 2017 to explore the community's hopes and concerns for the joint-use facility, with the key concern being the proposed location of the facility being Carrington Park.
			Consequently, the location of the joint-use library and community facility was reconsidered, and the location was adjusted to be entirely within the Young High School boundaries with public access via Carrington Park.
			To date, engagement and consultation with the community has included:
			November 2017- Community Engagement Meeting
			November 2017 to March 2018 - Council online survey
			 March 2018 - Listening Posts with Council staff and Councillors to provide feedback on concept design and strategic framework
			March 2018 to April 2018 - 'Think outside the box' Student Library Design Competition

Name	Type	Issue	Response
			 March 2018 - Ongoing- Steering Committee Meetings July 2019 - Community Information Sessions November 2019 - Community Information Sessions
			Further information is also available Appendix Y of the EIS (Consultation Summary Report).
			Further information on the SSD process and the requirements can be found on the NSW Planning Portal: https://www.planningportal.nsw.gov.au/major-projects/assessment/state-significant-development/ssd-process/exhibit-da
		Insufficient time provided to review documents, also exhibition period was close to the Christmas period.	Refer to response above. The Department of Planning, Industry and Environment is responsible for managing the statutory public exhibition process.
			All SSD development applications (DAs) must be exhibited for at least 28 days.
			The DA submitted by SINSW was exhibited in line with the SSD process between 13 November and 10 December 2019. Late submissions made in 2020 were also accepted and have been considered in this letter of response.
			Further information on the SSD process and the requirements can be found on the NSW Planning Portal: https://www.planningportal.nsw.gov.au/major-projects/assessment/state-significant-development/ssd-process/exhibit-da
		Young Public Library does not need to be located within the school grounds. It can be refurbished and left in its current location.	In June 2017, the NSW Department of Education (DE) announced that Young High School would be upgraded with a new library to support growing educational and community needs in the area. This need was identified as the current school library has an under-allocation of space to provide specialist curricula, such as multimedia and art, against Educational Facility Standards and Guidelines (EFSG). This has been exacerbated by an increased student demand for such facilities and a loss of access to the technology hub and multimedia centre on the adjacent TAFE site.
			In September 2017, Hilltops Council submitted an Expression of Interest for a grant from the Regional Cultural Fund to go towards a new library in Young. The need for a new community library had been identified in the 2014 Cultural Infrastructure Masterplan commissioned by Young Shire Council prior to amalgamation with Harden and Boorowa Shires to what is now known as Hilltops Council.

Name	Туре	Issue	Response
			There were potential synergies to develop a joint-use project between DE through Young High School and Hilltops Council that would add value to both the school and the community and would make for more cost-effective use of infrastructure.
			The Department of Education, School Infrastructure NSW (SINSW) and Hilltops Council signed a joint-use Memorandum of Understanding (MOU) in November 2017 and agreed, as partners, they would explore the feasibility of a joint-use school community-library that would provide a greater level of public benefit and avoid duplication of services. The joint-use Library and Community Facility would be the focal point of the emerging Hilltops Cultural, Community and Education Precinct.
			In April 2018, Hilltops Council submitted a Business Case to the Regional Cultural Fund that considered three options, with funding being awarded to Hilltops Council for a purpose-built joint-use facility with Young High School as the preferred option based on the Business Case.
			Further, the existing Young Regional Library is undersized, and the building is in need of significant refurbishment. The cost of undertaking this work is estimated to be roughly the same as Council's contribution to the new facility. With a refurbishment, the ongoing maintenance cost from day one will likely be higher than for a new building. A joint use facility will also provide a greater number of facilities and resources than 2 individual libraries.
			The location of the facility was adjusted based on early community feedback that indicated it should not be located within Carrington Park. The proposed location minimises impacts to the park.
		Potential adverse impacts to Carrington Park including trees within the park.	The proposal has generally minimised tree removal in Carrington Park. Several trees are proposed to be removed due to poor health, protection of the Reconciliation Tree (which has significant cultural heritage value), to improve heritage vistas to the former Courthouse building and to allow works to the car park. Refer to pages 4-6 of the Arborist Report provided with the EIS for further detail.
			In addition, improvements to the park are proposed including the reinstatement of Currawong Walk and interface landscaping with the school boundary.
		Fence not shown on plans.	The fence is indicated on the existing and proposed Architectural Plans provided with the EIS. The fence is labelled and indicated by the black line running along and near the site boundary.

Name	Type	Issue	Response
Lynelle Smithers	Objects	The community library should remain accessible to all residents/elderly/visitors within the central business area.	The joint-use project between DE through Young High School and Hilltops Council adds value to both the school and the community and would make for more cost-effective use of infrastructure.
			The entry to the joint-use library and community facility will be located 140 metres from Campbell Street and 800 metres away from the existing community library. It is acknowledged that accessibility for older residents is a key community concern.
			Hilltops Council is continuing to explore options to address these concerns. So far Council has committed to upgrading the car park located off Caple St, adjacent to the TAFE building, to deliver an increased number of standard and accessible parking spots.
			Public access to the joint use library and community facility will be via a pathway along Carrington Park. It will run in similar alignment to the decommissioned Currawong Street that previously ran along the border of Carrington Park. The pathway will comply with building standards and allow individuals with mobility aids to access the facility.
			In addition, an existing community bus service will be altered to include drop- off at the new facility, as described in the response to DPIE's comments above. Council has committed to reviewing demand for further services and the costs of the service once the library has opened.
		18 trees removed from the well utilised park to make way for concrete & pavers is not necessary.	For clarification, 12 trees are proposed to be removed from the park, all of which are located near the school's site boundary. There are appropriate reasons for removing these trees and the overall impact on the park will be positive. Reasons for removal include poor health, protection of the Reconciliation Tree (which has significant cultural heritage value), improving heritage vistas to the former Courthouse building and to allow works to the car park. Refer to pages 4-6 of the Arborist Report provided with the EIS for further detail.
			In addition, improvement works are proposed to the park including the reinstatement of Currawong Walk and interface landscaping with the school/library boundary.
		Consider previous petition against the library location.	In the early stages of this project, it was proposed that the joint-use library and community facility be located on both the school, and within Carrington Park.
			As detailed above, a petition was set up by the 'Friends of Carrington Park' group and gained 2,272 signatures from community members who did not support this footprint and did not want the joint-use library and community

Name	Type	Issue	Response
			facility to be located within Carrington Park (Young Witness, 11/11/2019, Marilyn Stemm)
			In response to concerns raised in the petition, the location of the joint-use library and community facility was reconsidered, and the location was adjusted to be entirely within the Young High School boundaries with public access via Carrington Park.
Withheld - (This submission was duplicated and	Objects	Location of new library is inaccessible, particularly for elderly residents. The existing library is co-located with essential services for the elderly who catch the community bus into the	The joint-use project between DE through Young High School and Hilltops Council adds value to both the school and the community and would make more cost-effective use of infrastructure.
uploaded twice to the DPIE Major Projects Website)		centre of Young. Previous studies indicated that there was adequate building space at the existing library site to extend north to the then Peter Smith Dental Practice building and extend the rear of the library towards the laneway.	The existing Young Regional Library is undersized and the building is in need of significant refurbishment. The cost of undertaking this work is estimated to be roughly the same as Council's contribution to the new facility. With a refurbishment, the ongoing maintenance cost from day one will likely be higher than for a new building. A joint use facility will also provide a greater number of facilities and resources than 2 individual libraries.
			The entry to the joint-use library and community facility will be located 140 metres from Campbell Street and 800 metres away from the existing community library. It is acknowledged that accessibility for older residents is a key community concern.
			Hilltops Council is continuing to explore options to address these concerns. So far Council has committed to upgrading the car park located off Caple St, adjacent to the TAFE building, to deliver an increased number of standard and accessible parking spots.
			Public access to the joint use library and community facility will be via a pathway along Carrington Park. It will run in similar alignment to the decommissioned Currawong Street that previously ran along the border of Carrington Park. The pathway will comply with building standards and allow individuals with mobility aids to access the facility.
			In addition, an existing community bus service will be altered to include drop- off at the new facility, as described in the response to DPIE's comments above. Council has committed to reviewing demand for further services and the costs of the service once the library has opened.
			The relocation of the library facility is in accordance with the Young Cultural Infrastructure Master Plan 2014 and will provide additional community facilities and access to greater library resources. The new facility will also provide a regional hub to provide library resources to Harden and Boorowa which otherwise would not be available

Name	Туре	Issue	Response
		Clarify if Hilltops Council will be paying ongoing rents to Department of Education.	This submission relates to a commercial-in-confidence item and does not form part of this SSDA.
		Concerns regarding the removal of trees within Carrington Park.	The proposal has generally minimised tree removal in Carrington Park. Several trees are proposed to be removed due to poor health, protection of the Reconciliation Tree (which has significant cultural heritage value), to improve heritage vistas to the former courthouse building and to allow works to the car park. Refer to pages 4-6 of the Arborist Report provided with the EIS for further detail.
			In addition, improvements to the park are proposed including the reinstatement of Currawong Walk and interface landscaping with the school boundary.
		Potential existing tunnel could limit construction feasibility.	Heritage NSW advised SINSW that a tunnel could exist in the school courtyard. Ground penetrating radar scans were completed in the area identified by Heritage NSW, however scans showed no evidence of a tunnel.
			GHD subsequently met with community member Joe Kinsela who advised that the tunnels could be in an alternative location on the school grounds (as identified on the supplied map).
			Ground penetrating radar scans have been undertaken and there is no evidence of a tunnel within the areas scanned to a depth of 4m (refer to Attachment F).
			GML Heritage has confirmed that it is unlikely that a tunnel would have been constructed to transport accused from the former Gaol to the Courthouse.
			Site investigations have also been undertaken beneath the floor of the former courthouse building which provided no evidence of a tunnel.
Judith Pugh	Comments	Insufficient time provided to review documentation. Consultation should not be carried out in fruit picking season or near the Christmas/New Year's period.	Refer to response above. The Department of Planning, Industry and Environment is responsible for managing the statutory public exhibition process.
			All SSD development applications (DAs) must be exhibited for at least 28 days.
			The DA submitted by SINSW was exhibited in line with the SSD process between 13 November and 10 December 2019. Late submissions made in 2020 were also accepted and have been considered in this letter of response.
			Further information on the SSD process and the requirements can be found on the NSW Planning Portal: https://www.planningportal.nsw.gov.au/major-projects/assessment/state-significant-development/ssd-process/exhibit-da

Name	Туре	Issue	Response
		It was previously stated to the community that no work would begin until after the SSD process was complete and that no trees were to be removed. The exhibited plans appear to show trees in the Park and the school grounds as being scheduled for removal.	Removal of some trees is proposed in the SSDA, primarily to allow for works to proceed, to improve views and vistas to the heritage listed former Courthouse building, and to preserve the Reconciliation Tree (which has cultural significance). All removed trees will be offset by planting of additional trees.
		It was also previously stated to the community that only some minor works, not forming part of the SSD, would be undertaken during the School Holidays. Demolition of Block BB is considered central to the SSD process and should not be carried out outside of the SSD process.	This matter does not form part of the SSDA. A separate development application was approved by Hilltops Council for enabling works that included demolition of Block BB. Block BB was demolished within the parameters set out in this DA, which is separate to the SSDA process.
		I will be making comments on a number of the reports that make up this submission on the grounds that they misrepresent processes, are incomplete, fail to address crucial issues of, inter-alia, accessibility and heritage conservation, and that their inadequacy has produced a project that is inequitable, has design flaws, has already wasted money and will be a white elephant.	Noted – further comments were received after the exhibition period ended, which are considered below.
Joseph Kinsela	Objects	There may be a tunnel under the site of heritage significance that could also limit construction feasibility.	Heritage NSW advised SINSW that a tunnel could exist in the school courtyard. Ground penetrating radar scans were completed in the area identified by Heritage NSW, however scans showed no evidence of a tunnel. GHD subsequently met with community member Joe Kinsela who advised that the tunnels could be in an alternative location on the school grounds (as identified on the supplied map). Ground penetrating radar scans have been undertaken and there is no evidence of a tunnel within the areas scanned to a depth of 4m (refer to Attachment F). GML Heritage has confirmed that it is unlikely that a tunnel would have been constructed to transport accused from the former Gaol to the Courthouse. Site investigations have also been undertaken beneath the floor of the former courthouse building which provided no evidence of a tunnel.
Joseph Kinsela on behalf of Young Community Residents Association	Objects	This submission refers to the alleged inadequacy of the GML Heritage Impact Statement and the community consultation undertaken for this project and hence the report filed which describes that consultation. It also notes inadequacies in the social assessment report. The "Conservation Management Strategies" are also allegedly inadequate.	The prepared HIS and Conservation Management Strategies have been prepared to reflect the significance of the site and are beyond what was require by the project SEARs. A revised HIS is provided at Attachment E . A revised Social Impact Assessment is provided at Appendix D .

Name	Туре	Issue	Response
		Extensive comments provided on the various GML heritage and archaeology documents	 General comments on the submission in relation to heritage and archaeology are provided as follows: Although the submission broadly rejects the proposal as a whole, the principal criticisms of the submission—other than the draft Social Impact Statement—relate to GML's Heritage Impact Statement (HIS) and Conservation Management Strategies (CMSs) rather than detailed objections to the proposal itself. Conservation Management Strategies are higher level heritage management documents when compared to more comprehensive and detailed Conservation Management Plans. The CMSs provide a broad heritage assessment and strategies to build upon in the future conservation of both the School and Park. Gaps in knowledge and recommendations for additional research and consultation are identified in the CMSs. The Conservation Management Strategies for Young High School and Carrington Park were commissioned prior to the issue of the Secretary's Environmental Assessment Requirements (SEARs) on 27 November 2018. The SEARs only required that a HIS and an Archaeological Assessment be prepared. They required neither a CMS nor a CMP. The assessment process has benefited from the understanding of the place developed in the CMSs. Both the CMSs and HIS have been carried out in accordance with The Burra Charter for best practice standards and formats for heritage management documents set out by Heritage NSW. GML acknowledges minor errors in the documents but these do not affect the findings of the reports, the assessed cultural significance of the place or the assessed impacts arising from the proposal. Many of the criticisms made would be clarified by more consideration of the content of the CMSs. While many of the comments relate to the intricacies of the heritage value of the site and not to the proposed development, detailed responses to the criticisms raised in YCARA's submission are set out below where appropriate.
		Lack of consultation on the various heritage documentation prepared by GM: The failure of GML Heritage to consult the local museum and Historical society. The failure of GML Heritage to accept information I provided after I saw their draft Report. (When GML heritage were appointed, I suggested to the 'Steering Committee' 'liaison' officer I be put in contact with GML Heritage to	The Conservation Management Strategies reference resources found in the Young History Museum. In November 2018, Mr Kinsela forwarded information to Don Wallace at GML, who promptly responded and sought clarification and further evidence.

Name	Туре	Issue	Response
		provide assistance. I was told I could forward questions to them).	
		GML produced an inadequate report, which: • Fails to take into account and to evaluate various historical persons and events associated with the precinct • Provides an illustrated inaccurate description of the precinct	GML has assessed impacts on the cultural significance of the place and its setting and nearby heritage places and their settings. Settings of these places include, among other things, views.
	not be impacted by this development; I consider that this entire precinct, properly assessed, is impacted by any change and these must be appropriately managed; vistas are a crucia	itself. At s1.3.2 the report refers to nearby heritage items which will	Views—both historical and existing—have been analysed in the CMSs and the impacts of the proposed development on significant views—both beneficial and adverse—have been assessed in the HIS. The proposed development will restore a highly significant view to Building AA and will not impact on other significant views of nearby heritage items.
		without statutory force) Register of the National Estate.	A revised HIS is provided at Appendix E which includes reference to historical persons in amended Statements of Significance.
		At 1.3.3 the report states that a nomination for State Heritage listing 'for listing lands including part of the study area' is	The SHR nomination does not include the whole of the study area of the CMSs and HIS prepared by GML for the site, as shown below.
		The nomination includes the entire precinct of Carrington Park including the Catholic group of structures opposite, the former	Nominated curtilage:
		Primary School (now Arts centre) and the Bunya Pines formerly in the school playground.	Coccle (Anth)

Name	Туре	Issue	Response
			GML investigation area: Ripon Street Carrington Park TAFE/NSW Young Young High School Berthong Street
		Section 2.3. The Statement of Significance is insufficient. • The Dept. of Heritage has noted in its response to this application that the site, being the place on July 14th 1861 where rioters attacked the police who were holding prisoner the leaders of an earlier riot: • is a key moment in the history of racism in Australia considering that the Lambing Flat Anti-Chinese riots immediately led to the restriction of Chinese immigration to NSW and in the long term contributed to the formation of the White Australia Policy; • it is the second major battle that occurred between miners and police during the Goldrushes, the first being the Eureka Stockade in 1854; and • it was the second time the Riot Act was read in NSW history and was the first effectual reading of this act.	An amended HIS has been provided at Attachment E . The amended HIS includes revised Statements of Significance that include greater reference to the riots' role in racism within Australia and clarification of significant dates.
		The report only mentions the reading of the Riot Act, without identifying the exact area where that action occurred, yet it is identified by a sign on Campell St. There can be no doubt that the number of rioters, not less than a thousand and in some estimates three thousand, would have taken up all the area that is now the Park, the nearby section of Campbell Street	Refer to the Archaeological Assessment provided with the EIS for further information. No picket fence has been found.

Name	Туре	Issue	Response
		and the upper level of the area now occupied by the Church and Arts Centre grounds. It is vital to identify the actual siting of the police stockade, courthouse and lockup Removal of any part of that picket fence would have taken away the last remaining indication of the former stockade fence over which police and rioters clashed. So the fence itself is of the highest significance. The assertion that the association with law and order is correct as far as it goes but as explained above fails to connect the various stages of occupation with the deep symbolism of the stand of the police.	
		The High School indeed has a long association with education, as the Courthouse was handed to the Education Department for use as a school in 1924.	This date is given at sections 2.2 and 2.3 on page 10 of the HIS. In the Statement of Significance, a key aspect of its significance is stated as: 'It has a long association with public education in Young in the first half of the twentieth century evidenced by the adapted courthouse and the 1937 science block.' For further information on the Courthouse's initial adaptation and education on the site between 1906 and 1937 see pages 27–29 of the CMSs.
		Discussion of the courthouse is provided and further consideration should be given in the various GML reports. Built heritage of the building is to be retained.	A detailed description of the Courthouse (Building AA) is given at page 10 of the CMSs. This is accompanied by captioned photographs. Comparable items are given at section 2.5. The design of Block NN has been carefully considered to respond to the built heritage significance of the former Courthouse building.
		James Barnet indeed designed the courthouse and others like it; but this assessment fails to mention it was built by John Gough, who also built the local Railway Station, which, as this document goes on to say, is a counterpart of the courthouse. Born in Victoria, Gough was a founder of the New South Wales Labour Party, (the Labour Electoral League,) the first political Labour movement in Australia. Elected to the NSW parliament in 1889, he was one of Labour's five-member leadership group formed in 1891. His mother was Australian-born, and his maternal grandmother was half-aboriginal.	Gough's involvement as builder is noted on page 26 of the CMSs. The building is well-built, and this is to Gough's credit. But the place does not demonstrate his role in politics.
		The police residences are not examples of Federation architecture, they are in the High Victorian Style of courthouse period and indeed bear, in the cast iron of the verandah: VRI Victoria Regina Imperatrix: Queen Victoria died in 1901 as the colonies federated. The failure to observe this simple but	The CMSs have used the well-respected reference work 'Identifying Australian Architecture' (A Pictorial Guide to Identifying Australian Architecture: Styles and terms from 1788 to the present, Apperly, Irving, et al., 1989) including the stylistic periods therein. That book acknowledges that these periods are not simply regnal periods of Victorian, Edwardian and so

Ethos Urban | 218064 25

Name	Туре	Issue	Response
		obvious architectural element (which was noted in the description of the courthouse) raises one of many questions as to the authority of this assessment.	on. Apperly et al. identifies, stylistically, the Victorian Period and the Federation Period to be c.1840–c.1890 and c.1890–c.1915 respectively. The regnal period of Queen Victoria as Empress of India was 1876 to her death in 1901 three weeks after the colonies of Australia federated.
			The imperial cypher of Queen and Empress Victoria did not go unobserved. Page 21 of the CMSs notes expressly: 'The cast iron brackets of the front verandah incorporate Queen Victoria's imperial cypher indicating its original governmental use as police residences.' This places their construction between 1877–1901—a span which bridges two stylistic periods. Page 21 describes the houses to be of the late Victorian/Federation period. The houses have more in common with Federation styles than Victorian styles.
		2.3.1 Level of Significance My points above indicate why I consider this building, indeed this precinct to be of State Significance. Table provided: I do not agree that Building EE, the current	It is not clear to which building YCARA refers, but presumably, it is the former Courthouse (Building AA), which has been considered at length in the GML documentation and the design of the proposal.
		School library, has little significance: I am concerned about proposed alterations.	Building EE is an ordinary building of its time—a recent time at that.
		2.4.2 It is difficult to match the numbers on the various plans and at least one tree is incorrectly described. The Landscape report(s) should be re-done and re-submitted for public scrutiny	It is acknowledged that the later documents do not use the same numbering system as that of the 2018 CMSs.
		2.4.4 States that the place does not achieve State Significance. GML Heritage failed to accept the information I provided as to the existence of a passage between the old	GML received information from Mr Kinsela during November 2019, to which further clarification was requested. No formal information was provided.
		Gaol and the Courthouse. This tunnel alone elevates the site to State Significance and must force a re-design of the proposed building.	No additional information had been forthcoming before the CMSs and HIS were complete.
		proposed building.	Heritage NSW advised SINSW that a tunnel could exist in the school courtyard. Ground penetrating radar scans were completed in the area identified by Heritage NSW, however scans showed no evidence of a tunnel.
			GHD subsequently met with community member Joe Kinsela who advised that the tunnels could be in an alternative location on the school grounds (as identified on the supplied map).
			Ground penetrating radar scans have been undertaken and there is no evidence of a tunnel within the areas scanned to a depth of 4m (refer to Attachment G).
			GML Heritage that confirmed that it is unlikely that a tunnel would have been constructed to transport accused from the former Gaol to the Courthouse.

Name	Туре	Issue	Response
			Site investigations have also been undertaken beneath the floor of the former courthouse building which provided no evidence of a tunnel.
		2.4.9 I agree that no new building should dominate the courthouse or the remaining elements of the Gaol. The proposed structure, twice as big as the Courthouse, sprawling across the precinct and having an unsympathetic design will draw the eye to itself rather than respect the existing historic structures.	The impact of the proposal on the significance of the Courthouse is addressed in detail in the HIS.
		3.2 Physical Description The description does not consider all detailed elements of the area including small plaques and various trees throughout Carrington Park.	The CMS for the park is a high level management document and is not a CMP. It identifies gaps in existing knowledge which could be addressed in a CMP. Section 3.9.9 recommends key strategies to advance our understanding of the place and guide heritage management.
		sides by roads. This is completely inaccurate, and clearly intended to advance the project by what is referred to in the EIS and the traffic report as 'Re-instating Currawong Street'.	The description states that the park is 'contained on four sides by roads, although Currawong Street has been integrated into the park so that Young High School and Young TAFE now form the southern edge of the park.' The complete sentence and the complete written description with supporting graphics makes it clear that the roadway has been lost.
		not an appropriate response to such a problem. I note that this report states that there is a long history of educational association 'from the first half of the 20th century.' In Heritage, there are no each-way bets; if mid-20th century is a long history to be taken into account, early 20th century is longer.	The Statement of Significance for the School states that it has a 'long association with public education in Young in the first half of the twentieth century'. The Statement of Significance for the Park states both that it is significant as it 'is the principal municipal park of Young and demonstrates the consolidation of Young as a town during the Federation period' and that 'it is representative of urban municipal parks of the late-nineteenth to midtwentieth centuries.' Due regard is given to various historical periods.
		The dirt track along the front of the Courthouse and gaol was gazetted as an 'Unnecessary Road' in 1910.	Crown Plan 213-1768 shown in figure 2.57 on page 37 shows that Currawong Street West was gazetted as closed on 31 March 1939. The photographs on page 32 of the CMSs indicate a linear unpaved roadway.
		It was gazetted for "Recreation" in 1939 and at that point incorporated into the Park. The sweep of lawn in front of the courthouse enhances that structure's Heritage importance. The resumption of the original track's alignment would unacceptably reduce the area of the Park.	The turf now on the former roadway is not an essential part of the former Courthouses setting. Several other similar courthouses have a similar fenced forecourt, roadway and park opposite extending the open setting—for example, Goulburn Court House. Such an arrangement is typical.
		The report notes the White memorial, and that Sarah Musgrave's name has been added: it fails to note that Musgrave was John White's daughter and the first European to be born in the district, and that her account of her family indicates great respect for Wiradjuri people. Oddly, the description of the memorial refers to the drinking fountain as a fountain, giving quite the wrong impression.	The CMSs assess this memorial as having moderate significance and fabric that must be retained and conserved. It identifies further research on the memorial.

Name	Type	Issue	Response
		The anti-Chinese riots were all in 1860-1.	The December 1860 and 1861 attacks and riots are discussed on Page 24 of the CMSs. The reference to 1862 in this part of the report appears to be an interpretation of the date physical evidence of the camp is recorded from SRNSW AO 6149. However, it may be a typographical error in this section.
		The area was gazetted as a place of recreation in 1886	Page 26 of the CMSs explains that the park was dedicated as a park on 14 December 1886 and proclaimed Young Park on 27 March 1888. The latter date is shown on the 1889 Town of Young Parish Map on page 35. Page 56 notes that Lord Carrington formally opened the park in December 1889.
		And gazetted as 'Young Park in 1888	Page 26 of the CMSs explains that the park was dedicated as a park on 14 December 1886.
		The list omits that road was declared 'unnecessary' in 1910	The declaration of the road as 'unnecessary' was omitted from the historical notes.
		Comments are made relating to the town's electrical power scheme and the significance of lights in the park.	This level of detail could be considered in a CMP. A CMS was commissioned and prepared which is beyond the project SEARs requirements.
		The report fails to identify the very unfortunate modifications to the bandstand, which structure requires restoration.	The CMSs assess the bandstand to be of high significance and recommend it be retained and conserved. It identifies gaps in knowledge about the bandstand including its designer and the location of drawings and other documentary evidence showing it in its original form.
		The report misrepresents the area incorporated into the park from 1939. The whole of the dirt track was incorporated. A carpark was established north of the TAFE in the 1970s when Young Technical College (then the Gaol tenant) became the TAFE.	The closure date is based on Crown Plan 213-1768. The last sentence on page 57 of the CMSs could be amended to clarify the sequence.
		Comments are made relating to the former courthouse gardens and the proposed landscape design, suggesting that the design does not appropriately consider the heritage of the site.	There are a number of considerations at the site both within and outside of the historical overlay to which the landscape design should also respond, and does. The outcome is a considered approach to balance all of these considerations, which include: • Arboreal requirements to avoid construction within the TPZ of retained heritage listed trees; • Indigenous heritage and narrative; • Design response to the landscape function as a civic forecourt and support school use requirements; and • First principle design considerations - access, circulation, security and stormwater drainage.
			The design for the forecourt is sympathetic to the Great Courthouse (Block AA) building and its past, providing a grand symmetrical paved arrival aligned with the heritage gates and stairs, flanked on either side with formal gardens beneath the retained heritage listed Hoop Pines (Araucaria cunninghamii).

Name	Туре	Issue	Response
			The garden then transitions from strong linearity to an organic geometry which is complementary to the new Building NN and local indigenous history.
		In my view these would first be parks associated with Courthouses, especially in Regional areas. Bathurst, Goulburn and Orange have been mentioned above. One could then compare courthouses such as Yass and Berrima, and Sydney courthouses. Parks to compare would include grander ones such as Albury but I would look for avenues of species such as Kurrajongs; the use of indigenous species began in Young in the mid 1880s and is evident in the park.	Belmore Park/Goulburn Courthouse have been cited with other examples. The comparable items are sufficient to establish general comparison at a CMS level.
		I note the deliberate specious reference to the alignment of Currawong Street. There is and (as explained above) never was a Currawong Street. Both the White Memorial and the nearby elm lie within this alignment.	The curtilage is plainly described as 'The curtilage includes the whole of Carrington Park, including the original reserve and the alignment of Currawong Street.' The alignment/former road reserve is mentioned so that it is clear that the heritage place includes not only the original curtilage of the original park, but the park as extended.
		Heritage Significance – Criterion C errors.	Criterion C relates to aesthetic value. The NSW criterion is that an item is important in demonstrating aesthetic characteristics and/or a high degree of creative or technical achievement in NSW. Aesthetic value is beyond the concept of 'beauty'. 'Dirt tracks' can have aesthetic value as much as a 'boulevard' can and can indeed be 'beautiful'.
		Criterion D (Social Significance) I note that it seems that when this report was submitted no assessment has been done on this basis, and assume that such an assessment would note the very high significance of the place to the town and district, that it is in continual use, for recreation, quiet contemplation, family picnics, weddings, funerals, municipal events, concerts, playing, reading, and lounging on the grass. An understanding of the park emphasises the degree to which alterations to the precinct must be contained and appropriate.	The Statement of Significance recognises the readily apparent social significance 'as a long-standing municipal open space within Young, the place would contribute the local community's sense of place.' This is conditional on a social significance assessment which has not been carried out within the scope of the CMSs or the HIS.
		Criteria E and F. I note the existence of the passage through which prisoners were taken to and from the courthouse and Gaol, and which elevates these two criteria to State Significance, and that my information about this was disregarded by the consultants.	No evidence of the tunnel, other than undated hearsay, was put forward prior to the completion of the CMSs and HIS.
		The Gaol was dedicated for use as a public school in 1932.	The former gaol was entirely out of the study area of the CMSs and the HIS.
		If gatehouse is iconic this should render it of State Significance.	The assessment of the significance of the former gaol was outside the scope of the CMSs and HIS.
		The Social Impact Assessment provided with the EIS is allegedly inadequate.	Walking distances are indicative only and are used to demonstrate the approximate location of various facilities and social infrastructure surrounding the site.

Name	Туре	Issue	Response
		Consideration of topography, weather and walking speed should be made when calculating walking distances.	
		Community consultation process was considered to be inadequate.	As outlined in the responses above, following the signing of the MOU, intensive engagement with the local community commenced about where the facility would be located and what it would include.
			In partnerships with SINSW, Hilltops Council held a community meeting in November 2017 to explore the community's hopes and concerns for the joint-use facility, with the key concerned being the proposed location of the facility being Carrington Park.
			Consequently, the location of the joint-use library and community facility was reconsidered, and the location was adjusted to be entirely within the Young High School boundaries with public access via Carrington Park.
			Engagement and consultation with the community has been undertaken between November 2017 and November 2019.
			The SSDA submitted by SINSW was exhibited in line with the SSD process between 13 November and 10 December 2019. Late submissions made in 2020 were also accepted and have been considered in this letter of response.
			Further information on the SSD process and the requirements can be found on the NSW Planning Portal: https://www.planningportal.nsw.gov.au/major-projects/assessment/state-significant-development/ssd-process/exhibit-da
Judith Pugh	Objects	The submission provides lengthy criticisms of the project, some of which are relevant to the SSDA process and some which are not. The submission has been categorised into key issues and responses provided below, where appropriate.	Many issues raised in the submission do not relate to the SSDA process. The following sections provide responses to the key relevant issues raised in the submission.
		Insufficient community consultation, including lack of consultation with existing library users.	As outlined above, following the signing of the MOU in intensive engagement with the local community commenced about where the facility would be located and what would include.
			In partnerships with SINSW, Hilltops Council held a community meeting in November 2017 to explore the community's hopes and concerns for the joint-use facility, with the key concerned being the proposed location of the facility being Carrington Park.
			Consequently, the location of the joint-use library and community facility was reconsidered, and the location was adjusted to be entirely within the Young High School boundaries with public access via Carrington Park.

Name	Type	Issue	Response
			 To date engagement and consultation with the community has included: November 2017 - Community Engagement Meeting November 2017 to March 2018 - Council online survey March 2018 - Listening Posts with Council staff and Councillors to provide feedback on concept design and strategic framework March 2018 to April 2018 - 'Think outside the box' Student Library Design Competition March 2018 - Ongoing- Steering Committee Meetings July 2019 - Community Information Sessions November 2019 - Community Information Sessions Further information is also available Appendix Y of the EIS (Consultation Summary Report). The engagement process aimed to engage the community holistically. Opportunity to provide feedback and attend the community information sessions were promoted widely through local newspapers, Council's social media channels, Council's website, the project website and flyers letter box dropped to a wide zone surrounding the School (to ensure neighbours that may be impacted by works were informed about the opportunity to provide feedback). These opportunities were also promoted through Young High School's communication channels including school newsletters to parents
		Proposal is inconsistent with the Young Cultural Infrastructure Masterplan (CIMP)	and carers and the school's social media channels. The CIMP suggested a location for the Library near Lambing Flats museum as it is near other cultural facilities. The CIMP recommends expanding the existing cluster of cultural institutions to form the "Arts and Cultural Precinct". The site for the proposed joint-use library is across the road from this "Arts and Cultural Precinct".
			Joint funding to build a library close to the Cultural Precinct will provide a better overall outcome than being disconnected. The proposed location will still facilitate potential expansion or renewal of these facilities and is located nearby.
		Library does not need to be relocated	The need for a new community library had been identified in the 2014 Cultural Infrastructure Masterplan commissioned by Young Shire Council prior to amalgamation with Harden and Boorowa Shires to become what is now known as Hilltops Council.
			In June 2017, the NSW DE announced that Young High School would be upgraded with a new library to support growing educational and community

Name	Туре	Issue	Response
			needs in the area. This need was identified as the current school library has an under-allocation of space to provide specialist curricula, such as multimedia and art, against the Educational Facility Standards and Guidelines. This has been exacerbated by an increased student demand for such facilities and loss of access to the technology hub and multimedia centre on the adjacent TAFE site.
			In September 2017, Hilltops Council submitted an Expression of Interest for a grant from the Regional Cultural Fund to go towards a new library in Young. The need for a new community library had been identified in the 2014 Cultural Infrastructure Masterplan commissioned by Young Shire Council prior to amalgamation with Harden and Boorowa Shires to become what is now known as Hilltops Council.
			There were potential synergies to develop a joint-use project between DE through Young High School and Hilltops Council that would add value to both the school and the community and would make for more cost-effective use of infrastructure. The Department of Education, SINSW and Hilltops Council signed a joint-use Memorandum of Understanding in November 2017 and agreed, as partners, they would explore the feasibility of a joint-use school community-library that would provide a greater level of public benefit and avoid duplication of services. The joint-use Library and Community Facility would be the focal point of the emerging Hilltops Cultural, Community and Education Precinct.
			In April 2018 Hilltops Council submitted a Business Case to the Regional Cultural Fund that considered three options, with funding being awarded to Hilltops Council for a purpose-built joint-use facility with Young High School as the preferred option based on the Business Case.
			The school library must be located at the school. It is not practical for students to travel to an external library facility for regular classes.
		Location of the facility was not given sufficient consultation and insufficient number of locations considered	Following the signing of the MOU, as intensive engagement with the local community commenced about where the facility would be located and what it would include.
			In partnerships with SINSW, Hilltops Council held a community meeting in November 2017 to explore the community's hopes and concerns for the joint-use facility, with the key concern being the proposed location of the facility within Carrington Park.
			Consequently, the location of the joint-use library and community facility was reconsidered, and the location was adjusted to be entirely within the Young High School boundaries with public access via Carrington Park.

Name	Туре	Issue	Response
			 To date engagement and consultation with the community has included: November 2017- Community Engagement Meeting November 2017 to March 2018 - Council online survey March 2018 - Listening Posts with Council staff and Councillors to provide feedback on concept design and strategic framework March 2018 to April 2018 - 'Think outside the box' Student Library Design Competition March 2018 - Ongoing- Steering Committee Meetings July 2019 - Community Information Sessions November 2019 - Community Information Sessions Further information is also available Appendix Y of the EIS (Consultation Summary Report). Further information on the consultation conducted can be found on the Hilltops Council website at: https://hilltops.nsw.gov.au/Council/Majorprojects/Hilltops-Cultural,-Community-and-Education-Precinc.aspx
		Previous petition against the library was not considered	submitted with the EIS. In the early stages of this project, it was proposed that the joint-use library and community facility be located on both the school, and within Carrington Park.
			As discussed above, the petition was set up by the 'Friends of Carrington Park' group and gained 2,272 signatures from community members who did not support this footprint and did not want the joint-use library and community facility to be located within Carrington Park (Young Witness, 11/11/2019, Marilyn Stemm)
			In response to concerns raised in the petition, the location of the joint-use library and community facility was reconsidered, and the location was adjusted to be completely within the Young High School boundaries with public access via Carrington Park.
		Potential underground tunnel not appropriately considered	Heritage NSW advised SINSW that a tunnel could exist in the school courtyard. Ground penetrating radar scans were completed in the area identified by Heritage NSW, however scans showed no evidence of a tunnel.
			GHD subsequently met with community member Joe Kinsela who advised that the tunnels could be in an alternative location on the school grounds (as identified on the supplied map).

Name	Туре	Issue	Response
			Ground penetrating radar scans have been undertaken and there is no evidence of a tunnel within the areas scanned to a depth of 4m (refer to Attachment F).
			GML Heritage has confirmed that it is unlikely that a tunnel would have been constructed to transport accused from the former Gaol to the Courthouse.
			Site investigations have also been undertaken beneath the floor of the former Courthouse building which provided no evidence of a tunnel.
		The agreement as to the management of this facility has not been published for comment.	There is a Joint-used Deed and leasing agreement being prepared between SINSW and Hilltops Council. Commercial and leasing agreements are outside of the scope of the SSDA.
		Heritage significance of the site is to be retained and the design of the structure is unsympathetic to nearby Heritage items.	The proposal has been designed to respond to the heritage significance of the site and has been assessed during the EIS process by GML. Refer to the original EIS documentation and the amended HIS provided at Attachment E , as well as responses to submissions made by Joseph Kinsela, YCARA and NSW Heritage Council above.
		Cabbage-tree palms of significance at the site have been removed	The removal of the Cabbage tree palms is unrelated to this SSDA. The aforementioned palms were removed in 2016 by the Energy Regulator as they were causing unscheduled blackouts.
		Various comments are provided relating to the commercial arrangements and funding of the project as well as the tendering process.	These considerations fall outside of the scope of the SSDA.
		A new community bus to the site will increase pollution	The community bus will provide access to the library for elderly and mobility impaired members of the community. The Green Travel Plan will promote sustainable transport.
		Café is unnecessary and out of character with the proposal	The café is an ancillary use to the library/community facility and will contribute activation fronting the park, as well as increased amenity for patrons.
		Clarify the shared nature of the facility. What will occur after school hours in the 'facility? Who is responsible for the students? Will they leave as schoolchildren at 5.00pm and immediately return as community members?	On school days, members of the community can have access to the facilities after 3:30pm. The community can have access to the facility fulltime on weekends and during school holidays.
		minodiatory return as community members:	During school hours, whilst at school (including school library facilities) students are under the responsibility of DoE. After school hours, students become members of the public.
		Clarify the hours of operation for the facility.	Extra-curricular activities in the joint-use library will be through joint-use bookable spaces.

Name	Туре	Issue	Response
			School finishes at 3:30pm. Students must leave the school library facilities and if they wish to stay, may enter the community library facilities or meet with their extra-curricular carer to access OOH bookable spaces.
			Refer to the EIS for proposed hours of operation.
		A professional standard art gallery should be included	A professional standard art gallery was not part of the project brief. Gallery space was requested by several members of the community through community consultation. Hilltops Council determined that the community room on ground could be a flexible gallery space.
		A childcare should be included	A children's reading area is provided in the current design. There was no intention to provide a childcare facility in the project brief. There is a childcare facility located nearby.
		Attention should be paid to Wiradjuri representatives if they want a space at the School	The school currently has Wiradjuri classes, but no permanent space. The space needs to be in the library as it is a teaching space.
		Access Issues: Installation of Currawong Walk would impact on the waterwise garden and have a detrimental impact on Carrington Park.	The pedestrian link is required to provide equitable and public access to the new school building. A portion of the Waterwise garden is required to be removed to achieve this but the remainder of the garden will remain intact. The proposal was developed in consultation with Hilltops Council. The environmental and heritage impacts of the proposed walkway have been addressed in the documentation submitted with the EIS.
		Design of Block NN is inappropriate and does not reflect Wiradjuri Culture.	Refer to Design Report provided with the EIS and responses above.
		Consider heating impacts and wind impacts in terms of the sustainability of the proposal.	The building fabric (particularly windows) is subject to a Section J Report which requires all external building fabric to meet standard performance requirements for the relevant climate zones across Australia.
			The site analysis considers prevailing winds. Young also has prevailing winds which were considered based on data acquired from the BOM and has been used to guide the design.
			The proposed design has undergone 2 rounds of testing with the project ESD consultant (WSP). Extensive shading has been used on the north facade to ensure it meets JV3 requirements of the National Construction Code 2019.
		The submission refers to Joseph Kinsela and YCARA submissions, agreeing with the comments made on heritage.	Refer to above responses to YCARA, Joseph Kinsela and NSW Heritage Council comments.
		Various comments are made on the Traffic Impact Assessment, including: • Sunday morning is peak time at the park • Nearby funerals will impact traffic flow	The Traffic Impact Assessment Report (TIAR) concluded that an appropriate amount of parking will be provided to service the library.

Name	Туре	Issue	Response
		Pedestrian bicycle link to CBD is unnecessary and will have cost implications Consider local traffic/social behaviours Consider weather and the slope of Campbell Street	Traffic counts and parking surveys indicate local traffic behaviours, which are presented in the TIAR and have been considered in the design of the proposed development.
		 How will the community bus provide access Consider environmental impacts of additional car trips generated by the proposal 	Existing footpaths may be used as shared pathways to access the CBD and other surrounding areas.
		gonelated by the proposal	Council has committed to reviewing demand and costs for the community bus which can be expanded or modified to provide access to the facility.
			The Green Travel Plan addresses alternative means of transportation.
			Other issues raised fall outside of the scope for the TIAR.
		Currawong Walk appears to be wide enough to function as a road, while it is proposed for pedestrian access	Currawong Walk will not be used for vehicle access. It provides accessible pedestrian access through Carrington Park to the library.