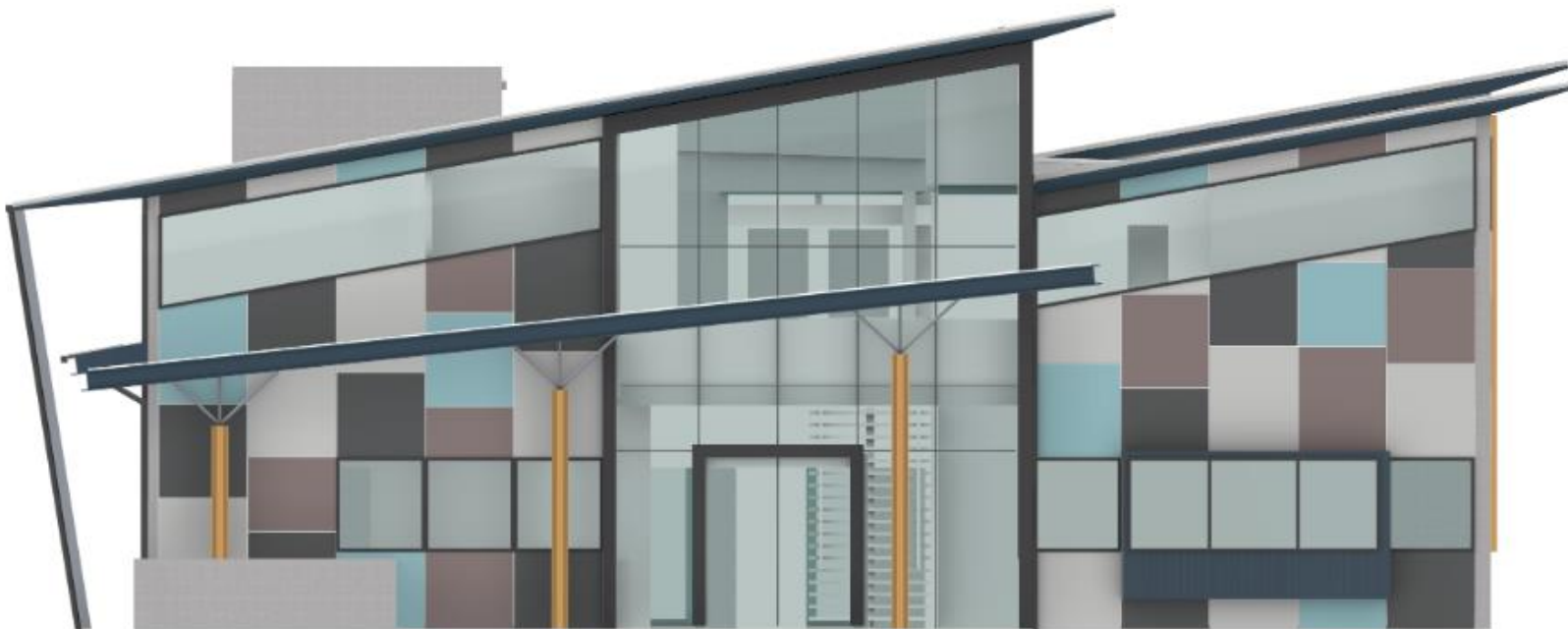


RESPONSE TO SUBMISSIONS REPORT
6A WATSFORD ROAD, CAMPBELLTOWN
SSDA FOR CONSTRUCTION OF A TWO STOREY SCHOOL BUILDING WITH
BASEMENT PARKING



Prepared on Behalf of: Warakirri College

Prepared by: Planning Lab

Issue Date: 11 June 2020

Disclaimer: This document may only be used for the purpose for which it was commissioned. Changes to available information, legislation and schedules are made on an ongoing basis and readers should obtain up to date information. Planning Lab accepts no liability or responsibility whatsoever for or in respect of any use of or reliance upon this report and its supporting material by any third party. Information provided is not intended to be a substitute for site specific assessment or legal advice in relation to any matter. Unauthorised use of this report in any form is prohibited.

Contents

Summary.....	4
Department of Planning, Industry & Environment	5
Environment, Energy and Science Group	7
Transport for NSW.....	7
NSW Environmental Protection Authority	12
Campbelltown City Council	12
Sydney Water	17
Endeavour Energy.....	17
National Indoor Sports – Campbelltown	18
Appendix A – Campbelltown City Council Local Government Area Zones of Aboriginal Archaeological Sensitivity	19

Summary

This Response to Submissions Report has been prepared by Planning Lab on behalf of Warakirri College in support of SSDA SSD-10420 relating to 6A Watsford Road, Campbelltown. This Report responds to the submissions by the following organisations:

- Department of Planning, Industry & Environment
- Environment, Energy and Science Group
- Transport for NSW
- NSW Environmental Protection Authority
- Campbelltown City Council
- Sydney Water
- Endeavour Energy
- National Indoor Sports Campbelltown

This Response to Submissions should be read in conjunction with the Environmental Impact Statement (EIS) prepared by Planning Lab and the Architectural Drawings by Koturic & Co. Accompanying this Response are the following attachments:

- Updated Architectural Plans by Koturic & Co (relating to drawings: A-01-C, A-03-C, A-04-C & A-06-C)
- Updated DA Acoustic Assessment by Acoustic Logic
- Updated Construction Management Plan by Ibiz Design
- Updated Waste Management Report by Waste Tech Services
- Preliminary Geotechnical Assessment of Potential Development Impacts on Railway Infrastructure by Consulting Earth Scientists

The updated architectural drawings by Koturic & Co reflect the following changes (which are identified on the drawings):

1. Minor modifications to bathroom layouts on Ground Level and Level 1 which includes the addition of a shower in each accessible bathroom for two showers total.
2. Addition of lockers on both levels near the bathrooms
3. The bike racks at the main entrance have been increased from 4 rails to 6.

Department of Planning, Industry & Environment

The DPI&E raised five comments concerning the proposal which are quoted and addressed below:

Comment	RESPONSE
<p>1. Traffic and Car Parking</p> <p><i>Provide information in relation to the performance of the existing local road network and information to support the conclusion that the proposal would have a negligible impact on existing traffic flows.</i></p>	<p>The proposal was found in the Traffic and Parking Report submitted with the EIS to have a maximum traffic generation of 13 vehicles during AM peak and 13 vehicles during the PM peak. A detailed assessment of the existing surrounding local road network would require a new and far more intensive report. Instead, we maintain that the maximum traffic generation of 13 vehicles during morning and afternoon peaks is self-evidently negligible considering that the site is located in an industrial area populated by buildings of low scale.</p> <p>It is noted also that Campbelltown City Council in their submission has indicated a general preference for more parking stating:</p> <p><i>“It is also noted that the provided on-site parking is not sufficient for the staff numbers indicated, but as with the students, the staff have good access to public transport with Campbelltown Station in close proximity”</i></p> <p>It is evident that but for the proximity of the Campbelltown Train Station, Campbelltown City Council has a preference for increased parking which would, in turn, generate more peak traffic than the current proposal. The proposed parking provision is held to be a suitable balancing point between the parking needs of College staff, the local road network capacity and the promotion of public and active transport.</p>
<p>2. Construction Management</p> <p><i>Provide:</i></p> <ul style="list-style-type: none"> <i>- details of indicative peak hour and daily heavy construction vehicle movements to and from the site;</i> <i>- details of the proposed construction vehicle access routes to and from the site;</i> <i>- a high level assessment of that the local road network can accommodate these vehicle movements subject to</i> 	<p>An updated version of the Construction Environmental Management Plan has been provided by Ibiz Design which the following response refer to:</p> <ul style="list-style-type: none"> Traffic movements have been addressed on pages 20-21 under Section 4.15 where the following movements are noted as: <ul style="list-style-type: none"> <i>‘6.30 am till 7.00 am – Up to 12 vehicles on street parking up to week 14, thereafter after parking on site.</i> <i>Deliveries - 7.30 am till 3.00 pm 2 – 3 heavy vehicles expected per day that will enter on site to offload (traffic control available on site for movements in and out of the site)’</i> Vehicle access to and from the site is necessarily from Watsford Road. Detailed access routes will be determined during the detailed design phase of development.

<p><i>appropriate management; and</i></p> <ul style="list-style-type: none"> - <i>how the use of a crane on the site would be managed to limit traffic impacts on surrounding roads and to ensure the safety of pedestrians and vehicles;</i> - <i>and justification of non-standard construction hours proposed for Saturdays.</i> 	<ul style="list-style-type: none"> - As discussed above in relation to traffic and car parking, the construction phase of development will generate a number of traffic movements that are negligible in the context of the surrounding road network. - The use of a crane and the associated impacts have been considered on pages 18-20 under Section 4.14. - A justification for the hours has been provided on page 52 under Appendix 11 (quoted below).
<p>3. Acoustic Assessment</p> <p><i>Provide an assessment of the predicted noise levels of proposed construction activities for the site.</i></p>	<p>The nominated site working hours are Monday to Friday 7:00am to 5:00pm and Saturday 7:00 am to 5:00pm. A comment has been added to the CEMP on page 52 justifying the hours stating:</p> <p><i>‘Saturdays are permissible under Campbelltown’s normal guidelines for an industrial area which is allowed 7 days a week. As there are no residential buildings within 500 meters of the site, there is no expectation of noise issues for residences.’</i></p> <p>Given the site’s location and the proposed hours of construction, the undertaking of a detailed acoustic assessment is considered unnecessary. The development will comply with all conditions of consent regarding construction noise during that phase of development.</p>
<p>4. End of trip facilities</p> <p><i>Provide details of any end-of-trip facilities proposed for the site, including their location.</i></p>	<p>The updated drawing set has shown shower facilities added into the uni-sex accessible toilets on both Ground and Level 1 on drawings A-03-C and A-04-C. Stacks of lockers have also been depicted on both Ground and Level 1 near the shower facilities. The accessible bathrooms are self-contained and private. They provide the most appropriate location within the College for shower facilities serving both staff and students.</p>
<p>5. Aboriginal cultural heritage</p> <p><i>Provide details on information considered in relation to evidence of Aboriginal cultural heritage significance of the site.</i></p>	<p>The site is shown on the Campbelltown City Council Local Government Area Zones of Aboriginal Archaeological Sensitivity to be in an ‘urban/industrial’ area (appendix A). The site is located within a disturbed industrial park and is not known to contain any items of aboriginal heritage.</p>

Environment, Energy and Science Group

A submission was also received from the Environment, Energy and Science Group within the DPI&E. It noted that a Biodiversity Development Assessment Report (BDAR Waiver) was approved on 27 February 2020 and had no comment concerning flooding.

A third comment was made concerning an Aboriginal Cultural Heritage Assessment Report:

“As part of the Request for SEARs EES recommended that an ACHAR be prepared. Planning and Assessment Group decided not to include this requirement in the final SEARs that were issued.”

As noted, the SEARs request did not require the preparation of an Aboriginal Cultural Heritage Assessment Report. The EIS included a reference to the site being shown on the Campbelltown City Council Local Government Area Zones of Aboriginal Archaeological Sensitivity to be in a ‘urban/industrial’ area. The site is located within a disturbed industrial park and is not known to contain any items of aboriginal heritage.

Transport for NSW

Transport for NSW (TfNSW) has provided a range of comments and recommendations. Their comments are summarised below with the recommendations responded to in tables.

Active Transport Considerations

TfNSW has commented that the Traffic and Car Parking Assessment and Traffic Report Addendum have not addressed active transport to their satisfaction. Their recommendations are considered in the table below.

RECOMMENDATIONS	RESPONSE
<ul style="list-style-type: none">• <i>Bicycle parking and end of trip facilities for staff and students should be provided in accordance with Campbelltown Council Development Control Plans, standards and guideline documents;</i>• <i>Reference to Sydney’s Cycling Future and Walking Future is outdated. Please instead refer to policy guidance in Future Transport 2056.</i>• <i>Locate bicycle facilities in secure, convenient, accessible areas close to the main entries incorporating adequate lighting and passive surveillance and in accordance with Austroads guidelines;</i>• <i>Provide signage/marked walkways to the school entrance from the car park; and</i>	<p>The Campbelltown DCP and policy documents do not provide any requirements for bicycle parking or end of trip facilities. Future Transport 2056 notes that before and after trip facilities such as secure bicycle storage can encourage cycling. The proposal provides end of trip facilities in the form of secure bicycle parking, lockers and showers in accordance with the vision of Future Transport 2056.</p> <p>The updated drawing set provided with this Response have increased the provided bicycle parking racks from 2 to 6 and maintained their location under the covered primary entrance.</p> <p>The updated drawing set has shown shower facilities added into the uni-sex accessible toilets on both Ground and Level 1 on drawings A-03-C and A-04-C.</p>

<ul style="list-style-type: none"> • <i>Update the Architectural package to show where these facilities will be located.</i> 	<p>Stacks of lockers have also been depicted on both Ground and Level 1 near the shower facilities. The accessible bathrooms are self-contained and private. They provide the most appropriate location within the College for shower facilities serving both staff and students.</p>
---	---

Green/ Workplace Travel Plan

TfNSW has recommended the preparation of Green/Workplace Travel Plan. Containing the elements described in the recommendation table below.

A Green/Workplace Travel Plan is not necessary to provide for the College as the vast majority of the students already access the existing Campbelltown Campus by public transport (bus and train).

Notwithstanding, the items that TfNSW asked to be addressed in a Travel Plan have been addressed briefly in the table below.

RECOMMENDATIONS	RESPONSE
<ul style="list-style-type: none"> • <i>Identify the total number of staff and students and predicted mode share;</i> 	<p>The proposed campus will accommodate up to 120 students and employ 12 full-time and two part-time staff members. Warakirri has determined over many years of operation that the College will have an average attendance rate of 60% which means that there will only be an average of 72 students on site on any given day. The College will have the highest level of attendance between 11am and 1:20 pm.</p> <p>11 car parking spaces are provided for staff and it is assumed that the majority of staff will drive. A minority of staff will likely access the site through public transport. Most likely from Campbelltown Train Station.</p> <p>Students are issued with school Opal cards subsidising their use of public transport. Many of Warakirri's students come from disadvantaged backgrounds and they rarely access the site by private vehicle. Of the average 72 students on site on a given day, it is estimated that up to 2 students will attend by bicycle. The majority of the remaining students will likely access the site utilising a combination of trains, buses and walking. It is rare for students to be dropped off or collected by private vehicle. It is even rarer that any student would attend as the driver of a car.</p>
<ul style="list-style-type: none"> • <i>Provide strategies that encourage the use of public and active transport and discourage the</i> 	<p>Students are provided school Opal cards which subsidise the use of public transport. The existing Warakirri College</p>

<i>use of single occupant car travel to access the site; for staff and students;</i>	campuses have demonstrated that the majority of students will access the site by public transport.
<i>• Determine a communication strategy for engaging staff, visitors and the local community regarding public and active transport use to the site;</i>	Bicycle parking and end of trip facilities are provided to encourage cycling to the site. Student's opal cards are subsidised. The site is located within easy walking distance of Campbelltown Train Station.
<i>• Map potential walking/ cycling routes and prepare a Transport Access Guide for staff and students providing information about the range of travel modes, access arrangements and supporting facilities that service the site;</i>	Students will be made aware of their transport options which include the use of subsidised opal cards and bicycle parking on site.
<i>• Include promotion of the health and wellbeing benefits of active travel to the site; and</i>	Students who wish to walk or cycle to the site will be encouraged to do so.
<i>• Identify the number of students within reasonable walking / cycling distance.</i>	As the site is located within an industrial zone, few students will presently be living within walking distance. Students will primarily utilise public transport to access the site.

Rail Noise and Vibration

TfNSW has commented that the Acoustic Report did not contain sufficient information in relation to noise and vibration. In response, an amended Acoustic Report has been provided which has addressed the comments of TfNSW.

Sydney Trains

TfNSW has commented that there was no consultation with Sydney Trains as part of the EIS. Sydney Trains have recommended that the information provided in Sections A and B of their submission be applied to the development. A 'Preliminary Geotechnical Assessment of Potential Development Impacts on Railway Infrastructure' letter has been produced by Consulting Earth Scientists specifically to address the comments raised under Section A 1-2 (reproduced below). The letter from Consulting Earth Scientists concludes in part that:

'...it is preliminarily assessed that the risk of adverse impact on TfNSW infrastructure due to the proposed construction works is low risk.'

The letter recommends further assessment be undertaken during the detailed design stage. This work will be undertaken at the appropriate time.

The design team is ready to make the relevant application for the Cranes and Construction Management Plans. We will make a request to the DPI&E in the coming days for the best contact person to provide this to. Below is an extract of the requirements under Section A:

Section A

*The Applicant shall prepare and provide to Sydney Trains for approval/certification the following **final version** items in compliance with relevant ASA Standards (<https://www.transport.nsw.gov.au/industry/asset-standards-authority>):*

- 1. Geotechnical and Structural report/drawings that meet Sydney Trains requirements. The Geotechnical Report must be based on actual borehole testing conducted on the site closest to the rail corridor, including a rail specific section on any potential impacts and mitigation measures.*
- 2. Construction methodology with construction details pertaining to structural support during excavation. The Applicant is to be aware that Sydney Trains will not permit any rock anchors/bolts (whether temporary or permanent) within its land or easements.*
- 3. Cross sectional drawings showing the rail corridor, sub soil profile, proposed basement excavation and structural design of sub ground support adjacent to the rail corridor. All horizontal and RL measurements are to be verified by a Registered Surveyor.*
- 4. Detailed Survey Plan showing the relationship of the proposed development with respect to Sydney Trains rail corridor (land and/or easements).*

In response to the comments contained in Section A, the requested plans and information are currently being prepared by the project engineer and surveyor. They will be submitted to Sydney Trains as part of the CC requirements.

Section B contains proposed consent conditions. The project team's response to the proposed conditions is as follows:

Condition No.	Response
1	Not applicable. Work will be away from panels and at least 30 meters away from the rail corridor. Plans are being prepared by engineer & surveyor and will be submitted to Sydney trains as part of CC requirements.
2	Not applicable. Planning Lab requests that this condition not be applied.
3	Plans prepared by hydraulic consultant and will be submitted to Sydney trains as part of CC requirements.
4	Plans are being prepared by engineer & surveyor and will be submitted to Sydney trains as part of CC requirements.
5	Plans are being prepared by engineer & surveyor and will be submitted to Sydney Trains as part of CC requirements.
6	Plans are being prepared by engineer & surveyor and will be submitted to Sydney Trains as part of CC requirements. None proposed.

7	Not applicable. No work is proposed within the rail corridor or its airspace.
8	Being prepared by Ibiz and will be submitted to Sydney Trains as part of CC requirements. This may vary when the builder is appointed.
9	Landscape plans have been prepared will be submitted to Sydney Trains as part of CC requirements.
10	This is already included in the CEMP and will be implemented during excavation and construction. Details will be submitted to Sydney trains.
11	Plans are being prepared by engineer & surveyor and will be submitted to Sydney Trains as part of CC requirements.
12	Electrolysis quotes have been received and will be submitted to Sydney Trains and implemented as part of CC requirements.
13	Already prepared by Acoustic Logic.
14	Accepted condition.
15	Accepted condition.
16	Accepted condition.
17	Accepted condition.
18	Accepted condition.
19	Accepted condition.
20	Accepted condition.
21	Accepted condition.

General Comments

The following general comments were provided.

RECOMMENDATIONS	RESPONSE
<ul style="list-style-type: none"> <i>It is unclear whether private vehicle trips with students as passengers has been included in modelling provided in the EIS.</i> 	<p>The private trip generation estimates in the Traffic and Parking Report did not include trips including students as passengers. This is because, as noted in the EIS and Traffic and Parking Report, Warakirri College students are between 15-22 years old and typically from disadvantaged</p>

<i>Please confirm.</i>	backgrounds. Students are provided with school Opal cards to subsidise their transport costs. As a result of the above considerations, Warakirri College students rarely access the campus by private vehicle and have therefore not been included in the private trip estimates.
• <i>Please confirm the operational hours of the school.</i>	Standard operating hours are to be weekdays between 8am-5pm for staff. Classes will operate between 9am-3pm.

NSW Environmental Protection Authority

The NSW EPA has referred to the Campbelltown City Council as the appropriate regulatory authority. They have provided no other comments. The submission from Campbelltown City Council is addressed below.

Campbelltown City Council

Campbelltown City Council's submission is addressed in the table below.

CATEGORY	COMMENT	RESPONSE
Vehicle Crossing, Driveway & Parking	<p>1. <i>The minimum width of the driveway shall be 5.5m wide clear of walls, edges from property boundary to Lower Ground floor facilitate the two-way movement as per AS2890.1 (Clause 3.2.2)</i></p> <p>2. <i>Parking spaces and aisle widths are satisfactory.</i></p> <p>3. <i>Driveway gradients - No driveway profile has been provided. The floor levels provided, minimum clear height on ramp and lower ground floor, driveway grades and transitions cannot be assessed against AS2890.1 without a driveway profile.</i></p> <p>4. <i>The vehicle crossing and corresponding layback in the road reserve shall comply with Council standard drawing SD-R10 Sheets 1 & 2.</i></p>	<p>1. The Traffic and Parking Report provided as part of the EIS states:</p> <p><i>"The proposed driveway for the car parking area is 6.0 metres wide and the ramp to the lower ground floor is 5.3 metres wide. The lower ground floor car park is for staff only and, as such, all staff will arrive in the morning and leave in the afternoon. The ramp, therefore, has a one-way traffic flow 'in' during the morning and one-way 'out' in the afternoon. Notwithstanding the one-way traffic flow, the entrance driveway at the top of the ramp has been widened 2.5 metres for a length of 9.0 metres in the unlikely event of two vehicles needing to pass on the driveway or ramp. In addition, a convex safety mirror will be placed at the bottom of the ramp to allow drivers on the lower ground floor to see any vehicles travelling down the ramp."</i></p>

	<p>5. <i>The Waste management plan doesn't clearly specify the waste collection strategy,</i></p> <p>6. <i>An MRV vehicle is nominated for waste collection - swept paths for an MRV servicing the site shall be provided. Paths and driveway grades for an MRV shall comply with AS2890.2.</i></p>	<p>The minimum width of a single lane ramp is 4.1 metres allowing 300mm either side for clearance to walls, etc. The proposal provides 5.3m and, as justified above, is sufficient for the development.</p> <p>2. As noted in the Traffic and Car Parking Report, the aisle widths and parking dimensions comply with AS 2890.1:2004.</p> <p>3. The Access Assessment Report by BCA Logic which accompanied the EIS commented on clear heights on page 10 in response to D3.5 noting that compliance was readily achievable. Access ramp details will be provided at the construction certificate stage of development.</p> <p>4. Noted.</p> <p>5. The revised Commercial Waste Management Plan by WasteTech Services has outlined the collection strategy under Section 4.4.</p> <p>6. An MRV is to be used for waste collection but is not intended to access the site. Bins will be collected as described in the amended Waste Management Plan.</p>
Stormwater	<p>1. <i>No stormwater calculations have been provided. Calculations shall be provided as per Council's Engineering design guide and may require redesign of the stormwater configuration.</i></p> <p>2. <i>Stormwater shall comply with Council's Engineering Design guide for developments.</i></p> <p>3. <i>The applicant shall demonstrate limiting post-development flow to pre-development flow, and this may require provision of an On-site detention system.</i></p> <p>4. <i>The pipeline in the road reserve shall be reinforced concrete minimum (375mm diameter class 3 minimum).</i></p> <p>5. <i>The proposed piped connection from the boundary to the existing kerb inlet pit will require adjustment / relocation of services</i></p>	<p>Harris Page & Associates are the project Hydraulic Consultants. They have provided the following responses to Planning Lab in relation to Council's stormwater comments:</p> <p>1. Should Council require additional calculations on top of the flow rates nominated on our drawings, clarification of the extent of the calculations is required.</p> <p>2. HPA confirm that their designs have been designed to Australian standards and Council guidelines.</p> <p>3. HPA has been advised by Samir from Campbelltown City Council by phone on the 16th of October last year that an OSD is not required as the site falls within an 'industrial zone'.</p> <p>Previous emails on this subject can be provided on request.</p>

	<p><i>(Sydney Water, Telecommunication, Electricity). This shall be undertaken at the applicant's cost and to the satisfaction of Council and relevant utility authority.</i></p> <p><i>6. The applicant shall provide a dual pump system for the basement in line with Council's Engineering Design Guide for Development.</i></p> <p><i>7. The proposed pump-out system in the basement is to have a backflow prevention device installed.</i></p> <p><i>8. It is noted that there is a drainage easement adjacent at the front property boundary however it is unclear why. It may be related to the sub-division of the parent lot into lots 6 & 6A.</i></p> <p><i>9. A condition preventing any signs being placed within the drainage easement adjoining Watsford Rd without Council approval is required.</i></p>	<p>4. The current Ø225 PVC pipe nominated on the current set of drawings is adequate to serve the stormwater discharge from the site. Should the council require the pipe to be upsized this can be included in our design upon request.</p> <p>5. Noted.</p> <p>6. Noted, will be nominated on drawings.</p> <p>7. Noted, this has been nominated on the current hydraulic drawings.</p> <p>8. It is understood that this easement is existing and is serving adjacent properties, we are proposing no additional works to the existing easement.</p> <p>9. Noted</p>
Traffic	<p><i>The submitted traffic and parking report states that the students attending Warakirri College are typically from disadvantaged backgrounds where students are issued with Opal cards to assist with travel cost. Council has reviewed the submitted traffic and parking report in the light of the above statement and noting that the proposed college will be funded by State and Federal Governments' Special Assistance Schools program. Given Warakirri College already operates two campuses in Fairfield and Blacktown; Council assumes this to be reasonable and based on the operational dynamics of the existing colleges. It is also noted that the provided on-site parking is not sufficient for the staff numbers indicated, but as with the students, the staff have good access to public transport with Campbelltown</i></p>	<p>Warakirri College has confirmed to Planning Lab that the assumptions stated in the Traffic and Parking Report and reproduced in Council's submission are correct and note Council's support in relation to transport given those assumptions.</p> <p>Minor note: Warakirri College already operates three campuses, not two. In addition to Fairfield and Blacktown, there is also an existing Campbelltown campus at 138 Queen Street, Campbelltown.</p>

	<i>Station in close proximity. Should any of these assumption be incorrect, the applicant would need to submit revised traffic and parking report for the assessment and approval by Council prior to the SSD being determined.</i>	
Acoustic	<i>It is recommended a condition be included requiring all windows to have a minimum acoustic Rw value of 31, as recommended in the applicant's acoustic report.</i>	Planning Lab has no objection to this condition being applied.
Building	<p><i>The most serious non-compliance of the proposed design is the fact the entire school (ground floor and first floor levels with 120 students and staff) has only one exit, discharging from one point, at the front of the building. There is no alternative exit from building proposed. The applicant's BCA report has deferred assessment of this issue by stating that they will do a separate Fire Safety Report, as a performance solution.</i></p> <p><i>Council is of the view that this matter is of enough significance that the performance solutions report be completed prior to approval of the project, as the non-compliance is a serious public risk to fire safety. Also, the site constraints are not conducive to a readily available deemed to satisfy solution, should the performance solution report fail to adequately address this non-compliance.</i></p>	<p>There are multiple exit points being:</p> <ol style="list-style-type: none"> 1. The primary entrance. 2. The rear exit to the outdoor & garden area. 3. Northern basement fire exit. 4. Southern basement fire exit. <p>The BCA Report prepared by BCA Logic and submitted with the EIS considered that performance-based solution could be utilised to address fire exits.</p> <p>Council's comment that the performance solution should be addressed prior to DA approval is predicated on the idea that the building contains only one exit which is incorrect. The performance solution will be addressed at the appropriate stage of development.</p>
Sporting facilities	<i>Some clarity around access arrangements to open space/sporting fields is required.</i>	Warakirri College students are aged 15 – 22. There is no specific curriculum requirement for sport in the traditional sense, that might require a field. None of our other three Warakirri campuses has a sporting field. Due to the small size of the College, maintaining such a space would be inefficient as it would be severely underutilised and would absorb financial resources from the charity that can be better allocated elsewhere.

		<p>The proposal does include a large indoor sports area in the basement which can be utilised if needed. If that space is not suitable for any particular activity, external facilities will be utilised. This could include students being taken to a local park (eg, Mawson Park), a bowling facility, indoor climbing centre, mini-golf (available on Watsford Road) or a facility offering indoor sports.</p> <p>The College has already made contact with the National Indoor Sports Centre, which is across the road from 6A Watsford Road, to allow students to access this facility for basketball, indoor cricket, indoor soccer etc. The National Indoor Sports Centre have themselves made a submission in favour of the development which is discussed below.</p>
Bicycle racks	<i>4 bike racks for 120 students appears to be inadequate.</i>	<p>Warakirri College operates three existing campuses which are in similar locations to this proposed development (less than 500m from a railway station). Each of these campuses has a similar number of students to the one proposed. The number of students who ride bikes is as follows:</p> <ul style="list-style-type: none"> • Blacktown (125 students) - 2 students ride to school. • Fairfield (98 students) - 1 student rides to school. • Campbelltown Queen St campus (90 students) - 2 students ride to school. <p>Notwithstanding, under the revised drawings, there are now six bicycle racks shown. The provision of six bike racks is entirely appropriate to the operation of the College in the absence of Council having any set guidelines for bicycle parking.</p>
CPTED	<i>A CPTED assessment should be undertaken as an industrial area with limited passive street surveillance may not be ideal for a school for disengaged students.</i>	<p>Warakirri College has been operating since 2008. During this time the College has never had any complaints made about students causing damage to neighbouring properties from any of the three campuses.</p>

	<p>The College operates during daylight hours with students arriving from 8:30am and leaving by 3:30pm. The College is fully staffed by teachers and other employees during these times.</p> <p>The area is industrial with nothing to encourage the students to loiter in the area. Students will likely gravitate towards the railway station and nearby Queen Street shops where there is activity and services. These areas are pedestrianised public spaces that are well monitored.</p> <p>Notwithstanding, CPTED principles were considered in relation to the proposed College building in Section 6.8 of the EIS.</p>
--	--

Sydney Water

Sydney Water provided the following two comments in their submission relating to the proposal:

“Water Servicing

- *Potable water servicing should be available via a 150mm DICL watermain (laid in 1990) on Watsford Road. Amplifications or adjustments may be required.*

Wastewater Servicing

- *Wastewater servicing should be available via a 300mm VC wastewater main (laid in 1989) located within the property boundary. Amplifications or adjustments may be required.”*

The recommendations of Sydney Water are noted and will be addressed at the appropriate stage of development.

Endeavour Energy

Endeavour Energy has provided a submission in which they state that the EIS has not provided sufficient detail for the suitability of the site in regards to the availability of electricity services. They have provided a range of options for confirming the availability of electricity which will be undertaken in due course. The Submission recommends that a condition of consent be placed on the consent stating:

“As a condition of the Development Application consent the Department should request the submission of documentary evidence from Endeavour Energy confirming that satisfactory arrangements have been made for the connection of electricity to the proposed development, prior to the release of the Construction Certificate / commencement of works.”

Planning Lab supports this condition which will allow adequate time during the CC stage of development to consider electricity connection.

Planning Lab notes Endeavour Energy's comments in relation to their Company Policy 9.2.5 'Network Asset Design', the necessity of maintaining vegetation away from electricity infrastructure, using the dial before you dig service and ensuring public safety. These considerations will be considered in the CC and construction stages of development as they become relevant.

National Indoor Sports – Campbelltown

National Indoor Sports Campbelltown is an indoor sport and recreation facility located diagonally opposite the Warakirri College site. Warakirri College has been in discussion with National Indoor Sports about the possibility of students using their facilities for physical education classes as discussed in the response to Campbelltown City Council's submission. The use of their facilities was discussed in their submission which said:

"We support this project. National Indoor Sports Campbelltown is a brand new sports facility located close to this project and we are looking forward to building a relationship with the Warakirri College in relation to their sporting requirements.

We believe this proposal will greatly assist the local economy of Campbelltown and it will assist us to keep casual staff employed and to continue to build our little sports business.

Please approve this project."

Warakirri College thanks National Indoor Sports Campbelltown for their submission and their support.









Appendix A – Campbelltown City Council Local Government Area Zones of Aboriginal Archaeological Sensitivity

This map can be accessed under the 'related maps' heading of the Campbelltown City Council DCP page:

<https://www.campbelltown.nsw.gov.au/BuildAndDevelop/PlanningPoliciesandControls/DevelopmentControlPlans/CampbelltownSustainableCityDevelopmentControlPlan2015>

Campbelltown City Council Local Government Area Zones of Aboriginal Archaeological Sensitivity

Zones

-  1. Extremely disturbed
-  2. Urban/Industrial
-  3. Steep valley slopes on sandstone
-  4. Plateau surface
-  5. Moderate to steep slopes on shale
-  6. Mid to basal valley slopes
-  7. Valley floor
-  8. Dolerite outcrop

Source: Campbelltown Local Government
Area Aboriginal Heritage Study
by Navin Officer Heritage Consultants,
September 2002.

**6A Watsford Road,
Campbelltown**

