# Supplementary Response to Submissions Report New Primary School at Googong SSD-10326042

On behalf of NSW Department of Education November 2021



**Project Director** 

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This document is for discussion purposes only unless signed and dated by the persons identified. This document has been reviewed by the Project Director.

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## 1 Introduction

This Supplementary Response to Submissions Report (RtS) has been prepared by Mecone NSW Pty Limited on behalf of NSW Department of Education (DoE) (the applicant) to support the proposed primary school in Googong, NSW (SSD-10326042).

The Response to Submissions and Amended Proposal for the project was exhibited on 12 October to 25 October 2021. A total of 7 submissions were received from the public and organisations including 5 "objects" and 2 "comments".

Additionally, comments were received from 4 government authorities including Queanbeyan-Palerang Regional Council (Council), Transport for NSW (TfNSW), Department of Planning, Industry and Environment Biodiversity and Conservation Division (BCD) and NSW Environment Protection Authority (EPA).

The Department of Planning, Industry and Environment (DPIE) addressed a letter to DoE dated 27 October 2021 requesting a response to the submissions received during exhibition.

This Supplementary RtS addresses the submissions received during exhibition and has been prepared with regard to State significant development guidelines – preparing a submissions report (DPIE, 2021).

This Supplementary RtS is accompanied by the following supporting documentation:

- Appendix A: Traffic response letter by Ason Group
- Appendix B: Response to Council's recommended conditions
- Appendix C: Updated select architectural drawings by Pedavoli Architects.

## 2 Analysis of submissions

A total of 7 submissions from the were received from the public including 5 "objects" and 2 "comments". No submissions were received from organisations.

All submissions were made by residents of Googong. Based on the content of the submissions, it is evident that the authors of the submissions all reside on Wilkins Way or the immediately connecting roads.

The primary issues raised in the submissions relate to traffic, parking and residential amenity.

Given the small number of submissions, the issues have not been grouped into key issues, and a submissions register has not been created. Instead, each submission has been addressed individually in section 4.3. This is consistent with the advice in *State significant development guidelines – preparing a submissions report* (DPIE, 2021).

## 3 Actions taken since exhibition

The project team has investigated the issues raised in the public submissions and government authority advice during the preparation of this report.

The project traffic engineer, Ason Group, has prepared detailed responses to the various traffic issues raised by Council and the public. Ason's response is attached at Appendix A.

Ason met with QCity (bus operator) on 5 November 2021. At the meeting QCity confirmed that Wilkins Way is the preferred interim bus route. Ason has prepared sketch plans showing the road upgrades required to accommodate the interim bus route along Wilkins



Way (see Appendix A). The upgrades are limited to changes to the intersections with Gorman Drive and Aprasia Avenue.

### 4 Response to submissions

#### 4.1 Response to Council submission

Table 1 provides a response to Council's submission dated 25 October 2021. Only the Development Engineering and Road Safety/Projects comments (sections 1 and 2, respectively, of Council's submission) are addressed because these were the only sections updated compared to Council's previous submission.

Additionally, Appendix B provides a response to Council's recommended conditions.

(For responses to Council's comments that remained unchanged from Council's previous submission, refer to Mecone's original RtS report dated 27 October 2021. The responses remain relevant.)

Table 1. Response to Council submission

Summary of Council comment	Response	
Development Engineering Comments		
<u>Bus bays</u> – Council does not agree that scheduling buses using the same route as the Anglican School will alleviate risk of queuing buses on Gorman Drive. Council stands by its recommendation and preference to utilise a greater proportion of Gorman Drive as bus bay.	The applicant proposes no further changes to the bus bays in response to Council's concern. The project team's investigations have found that bus bay queuing generally relates to lack of staggering the arrival of buses rather than the length/quantity of bays. As such, we suggest that Council's concern is best addressed through operational arrangements, which will be resolved as part of the School Travel Plan (STP) preparation process following SSDA determination. We further note that neither TfNSW nor QCIty has raised concerns with the bus bay length. Refer to Ason's letter at Appendix A for further	
<u>Gorman Drive pick-up/drop-off</u> – Council acknowledges the reduction pick-up/drop-off on Gorman Drive but notes that the original commentary on the EIS regarding the suitability of parking in this area is still generally relevant. The original commentary raised concern with conflicts between passenger vehicles and buses.	detail. Management of the Gorman Drive Special Education Learning Unit (SELU) parking is subject to the development of suitable management protocol as part of the STP preparation process. It is anticipated that a permit system and parking restriction signage will be implemented. Refer to Ason's letter at Appendix A for further detail.	
Wilkins Way bus route – The whole of Wilkins Way would likely require upgrading to accommodate a bus route on Wilkins Way. Alternatively, Council would consider it satisfactory to upgrade the intersections only to meet the amenity level required by buses.	The redesign of Wilkins Way to accommodate the kiss-and-ride has adopted the cross-section specifications for a "collector road" outlined in Council's Engineering Design and Construction Specifications. Based on the review undertaken by Ason Group, the following additional upgrades are required to accommodate a bus swept path:	



Summary of Council comment	Response
Helen Circuit is not a viable option for an interim bus route. Use of any interim bus route should be conditioned as temporary, with the use to cease once Gorman Drive is constructed to its full circuit.	adjustments to the kerb at the north- western corner of the Wilkins Way/Gorman Drive intersection and the south-western corner Wilkins Way/Aprasia Avenue intersection to achieve a kerb radius of 12.5m in accordance with Austroads
	<ul> <li>minor widening of Wilkins Way to meet Council's specifications at the intersections.</li> </ul>
	The sketch plan included in Ason's letter at Appendix A illustrates the required upgrades.
	Consultation with QCity and TfNSW concerning the interim school bus route commenced in August 2021. Ason Group met with QCity on 5 November 2021 and can confirm that Wilkins Way is the preferred interim route.
School zone – Council encourages the proposed school zone to be treated as an extension of existing one for the Anglican School along Gorman Drive.	The project team will prepare a revised signage and line marking plan showing a single school zone extending from the Anglican School and proposed school. Ultimately, however, the details of the future school zone will be determined by TfNSW.
Road Safety/Projects Comments	
<b>School zone</b> – Council raises concern with the disruptive changes in speed due to two school zones located in close proximity to each other (i.e., Anglican School and proposed school). Council recommends considering the surrounding road network in the design of the school zone.	Refer to school zone response above.
Flashing lights – Council notes that the proposal includes flashing lights for all school zones. Council requests that, if TfNSW does not support this, the major access points on Aprasia Avenue and Gorman Drive be prioritised.	The project team's recent experiences on school projects with multiple street frontages has found that it is common for more than one set of flashing lights to be in place to establish the school zone.
	Council's preference is noted and will be reflected in the future revised signage and line marking plan.
<b>Transport Coordinator</b> – Council raises concern that the Transport Coordinator cannot perform their role in 4 hours per week as allocated in the Draft School Travel Plan (STP).	Council's concerns are noted and will be considered during preparation of the STP following SSDA determination.
<b>Traffic controllers</b> – Council supports the use of qualified traffic controllers during the first 2-4 weeks of the school's operation.	The duration of the traffic controller role will be reviewed closer to the school's opening. The typical duration is 2 weeks at minimum.
<b>Bus zone –</b> Council raises concern about the length of the proposed bus zone. Council also suggests further consideration of supervision to and from the bus bays, which may require shifting of the mid-block crossing.	Refer to bus zone comments above. Council's concerns regarding supervision to and from the bus bays are noted and will be considered during preparation of the STP following SSDA determination.



Summary of Council comment	Response
<b>McPhail Way pedestrian crossing</b> – Council raises concern that pedestrians will cross mid- block at an uncontrolled point rather to navigate between the shopping centre and the McPhail Way school entry.	Council's comments are noted and will be considered during preparation of the STP following SSDA determination.
<b>Approval of STP by Council</b> – Council requires that the STP be submitted to Council for approval prior to occupation of the school.	The applicant accepts DPIE's standard condition regarding the STP, which requires the plan to be prepared in consultation with Council.
Interim bus route – Council raises concern that the interim bus route is not yet finalised. Council emphasizes that any interim route be able to accommodate the required bus movements.	The project team provided a draft interim bus route as part of Preliminary STP (Appendix 5b of the EIS) and has consulted with TfNSW and QCity regarding the route.
	Finalisation of the interim route requires further analysis of de-personalised data approximately 6-8 months prior to school opening, and therefore finalisation of the route typically takes place following SSDA determination.

#### **Recommended Conditions**

A detailed response to Council's recommended conditions is provided at **Appendix B**. Overall, the applicant disagrees with a number of the transport-related conditions but generally accepts the general conditions with a few minor exceptions.

#### 4.2 Response to agency advice

Table 2 provides a response to the advice received from TfNSW, BCD and the EPA.

Table 2. Response t	o agency advice
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Summary of advice	Response		
TfNSW			
TfNSW has reviewed the original RtS/amended proposal and does not object, subject to the updated conditions in Attachment 1 of their letter.	The applicant accepts TfNSW's recommended conditions.		
BCD			
BCD has no further comments or recommended conditions of consent for the project.	Noted.		
EPA			
EPA has reviewed the original RtS/amended proposal and is satisfied its comments has been addressed.	Noted.		



#### 4.3 Response to public submissions

Table 3 provides responses to the submissions received from the public and organisations. Further detailed responses to the traffic issues raised are provided in Ason's letter at Appendix A.

Submission ID	Summary of issues raised	Response
C. Notting Googong, NSW (Objects)	Drawings contain inaccuracies in regard to road labelling.	We acknowledge that the architectural site plan, site analysis plan and shadow diagrams contained labelling errors/omissions in regard to Percival Road, Ida Lane and Jones Lane. The plans have been updated to correct these errors/omissions (see Appendix C).
		The errors/omissions were clerical in nature and did not substantively affect the design or assessment of the project. We also consider that the errors/omissions were not seriously misleading and did not affect the public exhibition process substantially.
	Revised kiss-and-ride and new pedestrian entries will violate privacy of residents along Wilkins Way, Hopper Walk and Percival Road	The relocated kiss-and-ride may increase traffic and pedestrian activity along Wilkins Way (primarily on the eastern side), but this activity will occur at street level in the public domain and primarily during school peak hours. Generally speaking, standard school vehicular and pedestrian traffic along local roads does not give rise to serious privacy impacts that require special mitigation.
		We note that the Wilkins Way kiss-and- ride location was assessed from a noise perspective as part of the Amended Proposal, and the assessment found that the impacts will be minor, manageable and consistent with the previous location along Aprasia Avenue in terms of general level of impact.
	Amenity of Hopper Park will be reduced due increase in school- related pedestrian activity.	We do not expect the proposal to cause an undue influx of pedestrian activity that would result in Hopper Park being overutilised. The applicant does not intend for Hopper Park to function as a school playground or school- associated meeting area, and the proposed design does not encourage such an outcome.
		The kiss-and-ride along Wilkins Way will be utilised by vehicles, and the additional pedestrian entries along Wilkins Way are intended to cater for

Table 3. Response to public and organisation submissions



Submission ID	Summary of issues raised	Response
		students moving between the school grounds and the kiss-and-ride. As such, we do not expect a significant increase in pedestrian activity along the western side (i.e., Hopper Park side) of Wilkins Way due to the relocated kiss-and- drop and additional pedestrian entries.
		We also note that Hopper Park is a public park, and some increased activity in and around the park is not necessarily undesirable from a public domain perspective.
	Revised kiss-and-ride is unsafe due to slope, visibility, increased traffic and narrowness of Wilkins Way.	The Wilkins Way kiss-and-ride location was chosen after extended consultation with Council. Wilkins Way will be widened to accommodate the kiss-and-ride, and parking on the eastern side of the road will be formalised. We anticipate that the kiss- and-ride will operate efficiently on the widened/redesigned road with no significant impacts on traffic flow, safety or parking.
	Earlier attempts at providing comment were ignored.	It is unclear when or in what manner the previous attempt at engagement was made. Nonetheless, we note that significant pre-lodgement consultation with the community was carried out in the form of community information sessions, website updates, letterbox drops and other channels, as detailed in the Consultation Report at Appendix 21 of the EIS. The community also had a chance to comment on the application during the 4-week exhibition of the EIS.
P. Mccruden Googong, NSW (Comments)	Clarify what changes are being made to the eastern side of Wilkins Way (opposite school).	Parking will be removed along the eastern side of Wilkins Way near the intersections with Gorman Drive and Aprasia Avenue. The parking to remain along the
		eastern side of Wilkins Way will be formalised via line-marking to create a separate parking lane. No changes are proposed to the footpath on the eastern side of the road.
F. Whellum Googong, NSW (Comments)	Wilkins Way kiss-and-ride is undesirable as it will be inconvenient for parents and residents along Wilkins Way.	We have identified no particular issues with the Wilkins Way kiss-and-ride that would cause significant inconvenience for parents dropping off their children or for residents along Wilkins Way. The Wilkins Way kiss-and-ride location was



Submission ID	Summary of issues raised	Response
		chosen after extended consultation with Council and TfNSW.
Name Withheld* Googong, NSW (Objects)	Relevant traffic studies have not been carried out.	Traffic analysis considering the Wilkins Way kiss-and-ride formed part of the exhibited RtS report (see Appendix 8). The analysis found that the kiss-and-ride will operate efficiently with no significant impacts on the local road network, subject to implementation of management measures, including "No parking" signage and time restrictions.
	It is unclear whether Wilkins Way will remain two-way.	Wilkins Way will remain two-way. The road will be widened on the western side (school side) to accommodate the kiss-and-ride bays.
	Access to/from Jones Lane, Percival Road and Ida Lane is already difficult. Details regarding how this will be managed have not been provided.	The access issues identified by the objector are unclear. We foresee no significant impacts on access to/from Jones Lane, Percival Road and Ida Lane due to the relocated kiss-and- ride. Residents may have to navigate increased traffic at school peak hours, but we do not consider this to be an undue impact that requires special mitigation measures.
	Relocated kiss-and-ride will decrease value of homes.	Analysis of changes to property values due to the location of particular project components is outside the scope of environmental assessment for the project.
		From a general economic impact perspective, we anticipate that the proposal will result in positive impacts for the local community, including the creation of short-term construction jobs, creation of ongoing school staff jobs and increased activity at the adjacent commercial centre
	On-street parking is important along Wilkins Way due to Defence Housing Australia policy and may be compromised by the revised kiss-and-ride.	Approximately 13 on-street parking spaces along Wilkins Way will be removed near the intersections with Aprasia Avenue and Gorman Drive. This is required to upgrade the intersections to accommodate bus movements. We consider this to be a minor impact that will not cause any significant impacts on residents and visitors.
		Importantly, on-street parking on the eastern side of Wilkins Way will be formalised as part of the project, which will improve parking legibility and efficiency.



Submission ID	Summary of issues raised	Response
	Alternative kiss-and-ride location is preferable.	The Wilkins Way kiss-and-ride location was chosen following extended consultation with Council and TfNSW. The applicant has carried out the necessary design and analysis to ensure the kiss-and-ride along Wilkins Way will operate safely and effectively.
Name Withheld* Googong, NSW (Objects)	Wilkins Way is inappropriate for kiss-and-ride due to its narrow, curved nature. Traffic and parking are already problematic along this road. An alternative location, such as Gorman Drive or Aprasia Avenue, is preferable.	Wilkins Way will be widened to accommodate the kiss-and-ride area, and parking on the eastern side of the road will be formalised. We anticipate that the kiss-and-ride will operate efficiently on the widened road, with no significant impacts on traffic flow, safety or parking.
Name Withheld* Googong, NSW (Objects)	Mid-block pedestrian crossing on Gorman Drive will cause increased foot traffic. Crossings should be placed at either end.	The Gorman Drive crossings at either end of the street were consolidated into a single mid-block crossing in direct response to a request from Council to reduce the number of pedestrian crossings. The mid-block location was presented to Council, and Council deemed it suitable. The applicant foresees no significant impacts regarding residential amenity. Generally speaking, school pedestrian traffic within the public road reserve generally does not give rise to significant impacts on residential amenity that require mitigation.
Name Withheld* Googong, NSW (Objects)	Mid-block pedestrian crossing on Gorman Drive will be an inconvenience for drivers.	As noted above, the Gorman Drive crossings at either end of the street were consolidated into a single mid- block crossing in direct response to a request from Council to reduce the number of pedestrian crossings. The applicant considers the need for drivers to slow down at the crossing a positive feature that will contribute to a safety of the road network around the school.

\* The anonymous submissions are listed in order of their appearance on the Major Projects website.

## 5 Conclusion

This RtS has considered the submissions received in response to the public exhibition of the RtS and Amended Proposal of SSD-10326042.

Submissions were received from 7 individual members of the public, and advice was received from 4 government authorities.

Further investigation has been carried out and further information provided to address the submissions and authorities' advice.



Based on the supporting material provided in this RtS, in addition to the material provided in the original EIS and previous RtS, DPIE has now been provided with sufficient information to progress the assessment of SSD-10326042.



