John Palmer Public School

Response to Submissions Report (SSD-23330227)

architectus™

Prepared for:
NSW Department of Education

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1. Introduction

1.1 Purpose of this report

This Response to Submissions Report has been prepared for the State Significant Development Application (SSDA) (SSD-23330227) for upgrades to the existing John Palmer Public School (JPPS).

The proposed upgrades include the formalisation of learning spaces in a new three (3) storey building that will replace twenty (20) existing demountable classrooms on site. The proposed development will also provide eight (8) new learning spaces, an additional support learning unit, upgraded administration and staff facilities, a new purpose-built library, upgrades and additions to the existing School Hall building, and ancillary utility infrastructure and landscaping works.

This report provides a response to key issues raised in submissions by Government agencies, authorities and the general public, and assesses the changes made to the proposed development in response to submissions and design development.

The SSDA was publicly exhibited from 19 October 2021 to 15 November 2021. During this period, a total of nine (9) submissions were received, comprising four (4) public authority submissions from government bodies and council, one (1) from an organisation, and four (4) from members of the public. In addition, an Issues Letter was received from the Department of Planning, Industry and Environment (DPIE).

Refer to the summary of submissions received at **Section 2** of this report and the Submissions Register at **Appendix A**.

This Response to Submissions Report should be read in conjunction with the Environmental Impact Statement (EIS) prepared by Architectus Australia Pty Ltd (including appendices) exhibited from 19 October 2021 to 15 November 2021, and other supporting documents at **Appendices A** to **J**.

The response has been prepared in the form of a submissions report as per Appendix C of State Significant Development Guidelines (2021).

1.2 Overview of proposed development

SSD-23330227 was lodged with DPIE on 19 October 2021, under Division 4.7 of the Environmental Planning and Assessment Act 1979 (EP&A Act) and proposes upgrades to John Palmer Public School.

To achieve this, the EIS for the SSDA sought development consent for:

- Construction of a new three (3) storey building facing The Ponds Boulevard which will accommodate twenty-nine (29) Permanent Learning Spaces;
- Construction of a one (1) storey new library building;
- Relocation of the existing service access to staff car park off The Ponds Boulevard, including alterations to the existing car park to accommodate service vehicles;
- One-storey extension to and refurbishment of existing School Hall building. The School Hall extension will accommodate spaces for Out of Hours School Care;
- Building Block D will be re-purposed from an existing library to special program spaces and administration;
- Refurbishment of Building F to provide one (1) new support unit;
- Minor additions and internal refurbishments to Building A;
- Removal of all 20 existing demountable classroom buildings once alterations and additions have been completed; and

- Ancillary works to support the alterations and additions including landscaping and service provision.

1.3 Proposed changes to development

It should be noted that the only changes to the scheme relate to landscaped elements. These amendments are described in further detail in **Section 3.** Therefore, the proposed response to submissions does not result in any changes that modifies the description of the development.

1.4 Authorship

This report has been prepared by Boris Santana, Senior Urban Planner and Jasmine Bautista, Student Planner.

Jane Fielding, Senior Associate, Urban Planning RPIA (Registered Planner) has reviewed the report.

2. Analysis of submissions

2.1 Submissions to the proposal

A response to submissions made by government agencies and other bodies to the public exhibition of SSD-23330227 is set out at **Section 4.** A total of nine (9) submissions were received, comprising four (4) public authority submissions from government bodies and council, one (1) from an organisation, and four (4) from members of the public. These included submissions from:

- Heritage NSW – Aboriginal Cultural Heritage Regulation;
- Biodiversity and Conservation Division;
- Transport for NSW (TfNSW); and
- Blacktown City Council (in the form of an objection).

One (1) organisation submission from:

- Endeavour Energy.

Three (3) objections from members of the public and one (1) submission from The Ponds Shopping Centre (TPSC).

In addition, an Issues Letter was received from DPIE dated 17 November 2021.

Refer to the Submissions Register at **Appendix A**.

2.2 The project

<u>Intent of the project</u>

- TPSC submission notes that there will be a shortfall in the JPPS live-in catchment by 2036 of 479 students; however, the SSD application as submitted seeks approval to only accommodate 1,012 students. Accordingly, this capacity is not sufficient to accommodate the projected student shortfall.

  TPSC is concerned that the additional parking demand that would be generated because of the increased student population is likely to spill over into shopping centre car park, thereby reducing parking availability for staff and patrons of the centre. These concerns are discussed in further detail under **Section 2.4.**

<u>Community Uses</u>

- Blacktown City Council notes that there are no changes proposed to community use of the school facilities. Council indicates that there is opportunity to increase community use and access to the school facilities as outlined in the School Infrastructure NSW *Share our Space Program.*

  In this regard, Council has queried the area of the school dedicated to wider community use as shown in Figure 44 in the EIS (reproduced below at **Figure 1** for convenience). Council considers that there are additional potential activation opportunities that can take place through the program on the field as well as the sports court.

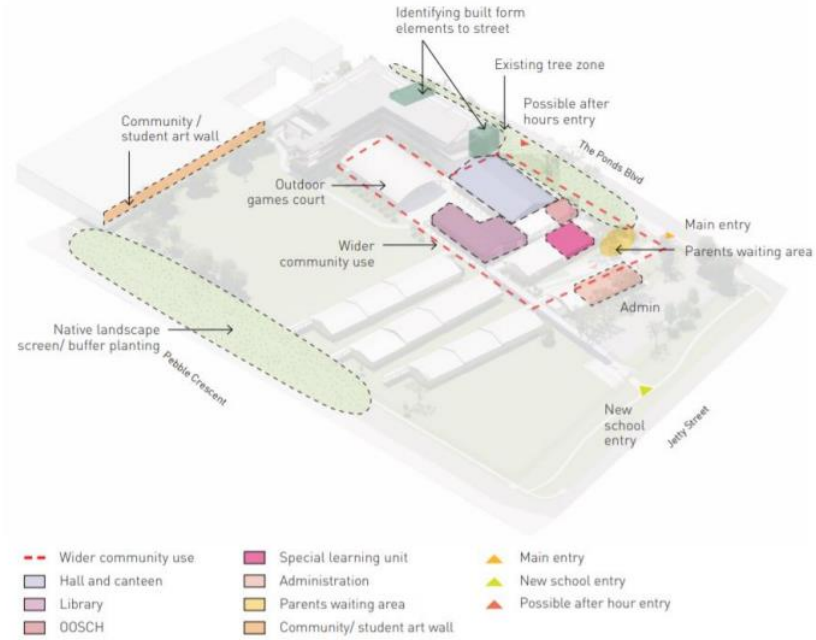

Figure 1 Community use of school facilities at JPPS (Figure 44 of the EIS)
Source: PTW Architects

However, if it is not part of the program, the upgrade for the school must not present a barrier to the school being considered and included in the Share our Space program for the future.

2.3 Procedural matters

Compliance with the SEARs

- **Flooding** – The EES Group considers that the Civil Engineering Design Report has not addressed the SEARs requirements as outlined in Item 15 of the SEARs.

  EES Group note that Blacktown City Council Online Flood Mapping does not include flooding information for the Second Ponds Creek catchment in The Ponds area. Therefore, it is not correct to refer to this Mapping to determine whether the site is flood affected. Furthermore, they contend there are other incorrect statements and references in the Civil report which need to be rectified.

  Given the above, the EES Group requests that a preliminary flood impact and risk assessment (FIRA) be undertaken by a suitably qualified professional engineer to determine whether the site is impacted by The Second Ponds flooding and/or local overland flow flooding for the full range of flooding up to and including the probable maximum flood (PMF).

  If the site is determined to be flood affected, the FIRA should adequately address the impact of:

  - flooding on the development;
  - development on flooding;
  - development on adjacent community; and
  - climate change due to increase in rainfall intensities.

  DPIE have requested that the applicant address the comments from the EES Group regarding the assessment of flood risk in the Civil Engineering Design Report.

- **Accessibility** – DPIE and Blacktown City Council note that the Accessibility Report submitted with the SSDA is for Glenwood High School and have requested that the applicant provide an Accessibility Report for the proposed school.

2.4 Economic, environmental, and social impacts of the project

Traffic and Parking

- **Operational Traffic** – Three public submissions have raised concerns with the current traffic volumes on The Ponds Boulevard and the likely increase in traffic volumes because of the proposed development.

  Furthermore, one submission raised concerns with the current behaviour of motorists during school pick-up/drop-off, which is considered to be unsafe and that the proposed development will lead to more instances of this type of behaviour.

- **Operational Parking** – Blacktown City Council and TPSC both raised concerns with the parking implications of the proposed development to the surrounding locality.

  Council notes that the car park at JPPS will only accommodate 60% of staff and anticipates that at least 40% of staff will park on surrounding streets, as travel patterns are unlikely to change in the foreseeable future. Council adds that the upgrades will also increase street parking demand from parents.

  Furthermore, Council consider that a development cannot solely rely on on-street parking as the street parking can be changed with time and demand from surrounding land use, noting that the new wombat crossing on Jetty Street already results in the loss of some street parking.

  Council therefore considers that the proposed development will impact the amenity of the surrounding residential area, which they believe will result in complaints from surrounding residents to Council. Although it should be noted that no submissions have been received from surrounding residents concerning parking.

  Similarly, TPSC is concerned that the proposed upgrades will result in additional parking demand that is not met by the school car park or street parking in the vicinity of the site, which they consider is already at capacity.

  As a result, TPSC contend that parking will encroach into the residential neighbourhood and particularly TPSC car park, which they believe is currently the case, particularly during school pick-up/drop off times.

  TPSC contends that the proposal should cater for all parking within the site to reduce this pressure on their car park.

- **Sustainable Travel** – TPSC contend that the proposed End-of-trip (EOT) facilities are not sufficient to create a modal shift. A Green Travel Plan needs to be implemented to force a change of behaviour away from reliance on private vehicles. Given the DCP parking variation, it is requested that this is implemented to support the development.

  TfNSW has reviewed the School Transport Plan (STP) and advises further improvements can be undertaken to increase the mode share for students to walk, cycle or scooter or take the bus/train to the school and back.

  TfNSW also requests that the STP is updated to monitor and measure the increase in public transport use, provide additional EOT facilities, consider more initiatives to promote additional use of active travel. Despite this, TfNSW considers the development can proceed without addressing these matters, subject to conditions.

- **Pedestrian Safety** – Blacktown City Council have also raised concern regarding safety of pedestrians crossing the driveway of TPSC to the north of the site and recommend a splayed corner to improve pedestrian sightlines. Refer to **Figure 2** which illustrates the relationship of the fence adjacent to TPSC.

Figure 2 Existing fence panels at the north-east boundary of JPPS adjacent TPSC, along The Ponds Boulevard
Source: Google Maps 2021

Furthermore, TfNSW has reviewed the proposed zebra crossing on Jetty Road and provides comments for further design and location of the raised zebra crossing design.

However, it should be noted TfNSW have recommended conditions regarding these matters, should they not be addressed prior to determination.

Design and Built Form

- DPIE has requested that the Government Architect NSW State Design Review Panel (SDRP) advice for the project is addressed, including advice relating to:
    - Inclusion of native landscaping and further opportunities to use endemic species that may attract native fauna to the school site and surrounding green spaces.
    - Investigating further outdoor learning spaces, connected to proposed classrooms, that address Connecting with Country principles.
    - Providing stronger visual connections between the school, Second Ponds Creek, and the green open space on the southern boundary of the site.

Noise impacts

- **Operational noise impacts to surrounds** – Two public submissions raised the issue of increased traffic and more students, which they contend will impact residents, particularly residents who plan to work from home.
- **Construction noise impacts to surrounds** – All three public submissions raised concern in relation to potential noise which is likely to impact on the amenity of residents during the construction period.
- **Noise intrusion from adjoining uses** – TPSC raised concerns regarding the proximity of new learning areas and classrooms to the existing shopping centre loading area directly north of the school development.

  TPSC contends that given its proximity, classrooms and learning areas may be impacted by noise emissions from existing loading activities. While acknowledging the location of TPSC, the submitted Noise Assessment at **Appendix H** of the EIS does not consider the proximity of the existing loading dock and its impact of its operations on the proposed development.

  TPSC loading dock is already subject to limited hours of operation. Concern is raised that, without any noise mitigation measures, the new learning areas and classrooms will be adversely affected by TPSC, thereby resulting in complaints against the TPSC and further restrictions being imposed on their loading activities.

Amenity

- **Solar Impacts** – One public submission raised concerns with the solar impacts to adjacent residences along The Ponds Boulevard from the new three storey building.
- **Hazardous materials** – One submission raised concern with the presence of any asbestos in current buildings and potential health impacts to surrounding residences if not handled properly.
- **Air pollution** – All three public submissions raised concern with additional pollution associated with an increase in car numbers that would be generated by the development.
- **Public utilities** – Two public submissions raised concern with the additional burden that the proposed upgrades will create on existing public utilities in the area.

Aboriginal Heritage

- Based on the assessment provided in the Aboriginal Cultural Heritage Assessment Report (ACHAR), Heritage NSW supports the recommendation that no further archaeological investigations or mitigation measures are required with respect to Aboriginal cultural heritage in relation to the proposal.

Biodiversity

- DPIE have identified inconsistencies between the Biodiversity Development Assessment Report (BDAR) and EIS in relation to trees being removed and retained.

Landscaping

- DPIE, in conjunction with the EES Group, have queried the removal of trees within the front setback to The Ponds Boulevard.

  In particular, the Biodiversity and Conservation Division notes that trees numbered 1-5, 7-9,15 and 132-133 (as numbered in the Arboricultural Impact Assessment Report prepared by Eco Logical Australia) within The Ponds Boulevard setback are proposed for removal which is contrary to the EIS.

  Most of the trees have been given a medium retention value and are semi-mature which have been established over the past 10-15 years. EES consider that these trees provide fauna habitat, landscape amenity and increasing contribution towards urban heat island effects.

  The Biodiversity and Conservation Division considers that a minor increase to setback would allow their retention. DPIE have requested the applicant consider the opportunity to increase these setbacks to protect and retain these trees.

  Furthermore, it is noted that Endeavour Energy have provided a submission which raises concerns regarding the proximity of screen planting around the padmount substation along The Ponds Boulevard frontage.

Social Impacts

- One submission raised concern of the social impacts on students from a larger school.

2.5 Justification and evaluation of the project as a whole

- One public submission raised concern with the area of the site and considered it insufficient to cater for the proposed development.

2.6 Issues that are beyond the scope of the project

- All three public submissions raised concern with the impact that the development is likely to have on property values and requested compensation.

3. Actions taken since exhibition

3.1 Minor amendments to proposal

Since the public exhibition of the SSDA, minor amendments have been made to the proposal in response to issues raised through submissions and resulting from design development.

A summary of each change and the rationale for each change is provided in **Table 1** below.

Table 1 Summary of minor amendments and rationale

Amended aspect	Rationale
Removal of panels on the fence and introduction of a splay to the north-east corner of JPPS	Reconfiguring the fence at the north-east boundary of JPPS to create a splay will improve sightlines for vehicles moving northbound and pedestrians approaching TPSC driveway. Overall, this will improve pedestrian safety at the north-east boundary of the school with TPSC.
The landscape concept has been modified such that pathway materials, external furniture and tree species have been amended	By amending the landscape concept, the proposed development addresses the advice and recommendations made by the SDRP in their meeting of 17 November 2020. Refer to **Appendix D** and **Appendix J** for further details.

The amendments described above are of a nature that does not require any changes to the description of the development. Furthermore, the Response to Submissions does not result in any changes to key numeric development information summarised inError! R eference source not found. **Table 2** of the EIS.

3.2 Updated document register

Additional statements and technical studies have been undertaken to support the Response to Submissions proposal and provide additional information and responses to the issues raised during submissions.

Table 2 below provides a register of the additional technical studies to support those submitted with the exhibited EIS documentation.

Table 2 Additional technical studies register

Document Title	Consultant	Revision	Date
Landscape Written Response	McIntosh & Phelps	-	15/12/2021
Revised Landscape Plans	McIntosh & Phelps	-	14/01/2022
Revised Transport and Accessibility Impact Assessment Report	TTW	2	14/01/2022
Acoustic Response Letter	AECOM	-	23/12/2021
Amended Biodiversity Development Assessment Report	Kleinfelder Australia Pty Ltd	3.0	06/12/2021
Accessibility Report	Philip Chun	R03	13/10/2021
Flood	Enstruct	B	14/01/2022

Document Title	Consultant	Revision	Date
Architectural Design Response to SDRP	PTW Architects	-	14/01/2022

The revised supporting documentation enables DPIE to undertake an informed assessment of the amended proposed development. The findings of the revised supporting consultant documentation that are relevant to the amended proposal are summarised in **Section 4** of this report.

4. Response to submissions

This section provides additional assessment of the proposed development (as amended) against the relevant matters for consideration under section 4.15(1) of the EPA & Act. The assessment is supplementary to and should be read in conjunction with the original EIS submitted as part of the SSDA, prepared by Architectus, dated 6 April 2021.

4.1 The project

Intent of the project

- JPPS belongs to The Ponds Primary School Catchment Group (SCG) which encompasses four schools in the suburbs of The Ponds, Kellyville Ridge, Stanhope Gardens, Parklea and Glenwood. The four schools, being in the same SCG, are therefore interrelated in how they are managed by SINSW. As such, the proposed upgrades to JPPS have been developed and considered in the context of the broader SCG.

  The SCG is projected to experience capacity shortfall of 479 students by 2036, underpinned by the strong population forecasted in the Central City District. The current live-in catchment of JPPS is projected to have a shortfall of 435 students by 2036. This is based on a student capacity of 828 students. In this regard, a capacity of 1,012 would have the effect of reducing the shortfall in the catchment to 251 students.

  Notwithstanding, this does not suggest that the proposed development will accommodate this number of students. To plan for schools, School Infrastructure NSW (SINSW) considers a range of factors to ensure the most effective and efficient asset solutions in infrastructure planning. Accordingly, upgrading the JPPS is only one option of many options that has been considered by SINSW to address the forecast student demand.

  As indicated in the EIS, a business case was prepared to consider and assess several options for upgrading JPPS. Option C was originally canvassed by SINSW to operate at a 1,219-student capacity, a higher student capacity which required a greater number of permanent learning spaces. On balance of factors, this option was discarded in favour of the current development as the optimal school planning solution for the SCG.

  SINSW acknowledge that the residual shortfall will need to be addressed by a separate intervention at another school within the SCG. Consequently, the proposed development is unlikely to operate at a higher capacity. If JPPS is required to take on higher enrolment levels, this serves to undermine the purpose of the proposed development to address overcrowding.

  SINSW reiterate that the development proposes to accommodate a capacity of 1,012. Notwithstanding this, it is critical to retain the ability of schools to service fluctuations if they do arise due to changing circumstances, ensuring effective and efficient asset solutions in infrastructure planning across the SCG.

Community Uses

- The school has some community use of facilities in the form of a soccer academy and music tuition. It is understood that the school also hosts basketball games on Fridays as part of the Primary School's Sports Association.

  Although **Figure 44** of the EIS shows the area of the school dedicated to wider community use, nothing prevents the use of the sports court for further community activities, provided it is not contrary to the Public Private Partnership (PPP) agreement.

  The school is part of a suite of schools delivered under the NSW Government's PPP program. Axiom Education No.2 Pty Ltd, a private consortium, financed, designed, and constructed the school and now provides ongoing management services to the school.

  SINSW does not propose any changes to community use of school facilities. Notwithstanding this, it should be noted that this matter is not within the remit of SINSW due to the abovementioned PPP agreement. Therefore, the commercial and legal implications of additional community uses requires further consideration.

4.2 Procedural matters

Compliance with the SEARs

- **Flooding** – A Flood Study Report has been prepared by enstruct which can be found at **Appendix H** to confirm the site's susceptibility to flooding and provide a flood risk assessment.

  Having regard to the Rouse Hill Flood Study, it is noted that the development site is around 5m above the 1% AEP flood height in Second Ponds Creek. Even with an increase in depths due to climate change, the study considers that the site will be unaffected by flooding. However, modelling has revealed that the school site is inundated in the PMF, with a depth of water of around 100mm.

  A freeboard of 0.5m above the 1% AEP flood level nearest to the site is required when setting Finished Floor Levels (FFL) and Flood Planning Levels (FPL) for building entrances. The proposed FFL of the new building is RL58.75m AHD which is sufficiently above the 1% AEP as well as the PMF flood height in Second Ponds Creek.

  The study notes that the PMF at the site is not relevant to flood planning as this is an extremely rare event. Notwithstanding, in the case of an unprecedent PMF event, the school will have sufficient time to react to the flood event and seek shelter above the PMF flood height on-site, given that flooding of residential houses adjacent the Creek and Riverbank Drive will give advanced warning before the site itself is impacted.

  Leaving the site and access to Pebble Crescent and the Ponds Boulevard will be unsafe and as such, remaining in the buildings above the flood levels is the desired option of refuge in this event. Alternatively, leaving the school site towards Jetty Street if prior flood warning is provided may be possible well in advance of PMF flood waters encroaching on the site.

  It is considered no flood waters will be adversely diverted when the proposed works are constructed. Likewise, no increase in flow velocity will be caused as the stormwater flow is not being diverted, compensating a downstream system.

- **Accessibility** – An Accessibility Report has been prepared by Philip Chun for the proposed development. Refer to **Appendix I**.

4.3 Economic, environmental, and social impacts of the project

Traffic and Parking

- **Operational Traffic** – A Transport and Accessibility Impact Assessment (TAIA) was been prepared by TTW, appended at **Appendix O** of the EIS. Traffic modelling was undertaken to assess traffic impacts associated with the proposed development at The Ponds Boulevard and Riverbank Drive intersection to assess the impact of the proposal to the surrounding road network. These results can be found in Section 4.7.4 of the TAIA.

  The modelling of background traffic growth through to 2026 and 2031 demonstrates that there is an expected deterioration of traffic conditions over time, and that the worsening of traffic because of the development is negligible compared to the results of background growth. Therefore, the traffic impacts as a direct result of the proposed development are considered negligible and acceptable in the context of the local network.

  Notwithstanding this, the STP seeks to change the current modal split of travel to reduce car-based travel and achieve a shift towards active and public transport modes. This will have the effect of further reducing the volume of private vehicles on The Ponds Boulevard. An updated version of the TAIA can be found at **Appendix E** to this report that provides a greater shift towards sustainable travel modes in line with the request in TfNSW correspondence.

  Regarding the concerns of unsafe driving behaviour associated with pick-up/drop-off, this has been considered in the STP in **Section 5.1** of the updated TAIA at **Appendix E**. It is detailed that pick-up/drop-off zones require deliberate management to ensure user safety and maintain an acceptable traffic flow. This will help to prevent any instances of unsafe driving.

  Operational Parking – The TAIA which appended the EIS identified the modal split of student and staff travel options to JPPS and increases in respective modes because of the proposed development. The existing and future likely modal split can be found in **Figure 56** of the EIS, which has been reproduced in **Figure 3** below.

	Students				Staff			
Travel Mode	**Mode Split**	**Existing Volumes**	**Forecast Volumes**	**Growth**	**Mode Split**	**Existing Volumes**	**Forecast Volumes**	**Growth**
Walk	15%	141	152	10	<1%	1[4]	1	0
Bicycle	8%	75	81	6	<1%	1[4]	1	0
Scooter	5%	47	51	3	0%	0	0	0
Bus	<1%	5[5]	5	0	0%	0	0	0
Drop-off & pick-up	60%	566	607	41	<1%	1[4]	1	0
Park & walk	12%	113	121	8	0%	0	0	0
Car (driver)	-	-	-	-	99%	55	58	3
Total	**100%**	**943**	**1,012**	**69**	**100%**	**56**	**59**	**3**

Figure 3 Travel mode forecasts – overall travel demands
Source: *TTW (2021)*

A preliminary STP was prepared and included as part of the TAIA. The STP sought to change this mode split to reduce car-based travel and achieve a shift towards active and public transport modes. The target modal split and impacts to volumes of respective travel modes is captured in **Figure 59** of the EIS, which has been reproduced in the below **Figure**.

Travel Mode	Existing Mode Split	Mode Split Target	Volume Change	Existing Mode Split	Mode Split Target	Volume Change
Walk	15%	25%	+101	<1%	3%	+1
Bicycle	8%	11%	+25	<1%	7%	+3
Scooter	5%	8%	+29	0%	0%	-
Bus	<1%	2%	+20	0%	5%	+3
Drop-off & pick-up	60%	50%	-101	<1%	0%	-1
Park & walk	12%	5%	-71	0%	0%	-
Car (driver)	-	-	-	99%	85%	-8
Total	100%	100%	-	100%	100%	-

Figure 4 Travel mode forecasts – mode share targets
Source: *TTW (2021)*

The STP addresses the role of TfNSW in moving towards sustainability by achieving reductions in emissions, a strategic direction espoused by the Future Transport Strategy 2056. The matter is underscored by recommendations from TfNSW during the submissions phase, which recommends a greater shift from private vehicle use to sustainable travel than that originally proposed.

The STP has been revised based on recommendations of TfNSW. Refer to Section 5.1.3 of the updated TAIA at **Appendix E** and extract in **Figure 6** below. The combination of 40% single-occupant vehicles with 40% carpooling vehicles (i.e., total of 80% of staff travelling by vehicle in some form) has the effect of resulting in a total demand of 36 spaces which is effectively equivalent to the proposed capacity of 35 spaces.

Whilst it is acknowledged that usage of on-street parking is anticipated in the short to medium term as modal shift occurs, on-street parking has good availability during school hours to accommodate the proposed development. Although this matter was discussed in the original TAIA, an assessment of on-street parking availability can be found be found in **Section 2.7.2** of the updated TAIA.

Regarding historical usage, on-street car parking nearby JPPS is occupied by a maximum of 88 cars during school days, and 140 spaces are available (excluding a reduction of 8 spaces because of the proposed wombat crossing). Although Jetty Street and The Ponds Boulevard are partially occupied, there are a high number of parking spaces available at both sides of Sail Street, Picnic Street, Teague Street, and west Pebble Crescent, and northbound of east Pebble Crescent.

The proposed works would increase the total staffing by an estimated 3 staff (from 56 to 59 staff). In order to achieve a net-zero result of no additional parking demand, only 5% of staff (3 staff) would need to change to a non-single occupant travel mode (e.g., carpool, public, or active transport). This is a low mode shift and considered achievable for a net-zero result, which is realistic to be achieved in the near future.

Notwithstanding, even if one considers the future volumes in **Figure 3**, any potential overflow is unlikely to cause undue impact to residents given the availability of on-street parking. It should be noted that this availability is unlikely to change significantly before the final mode shift is achieved, noting the age of housing stock in the locality. Furthermore, northbound of west Pebble Crescent is Plaza Park, which functions primarily as a drainage channel with a playground.

Given the above, provision of additional on-site parking is unnecessary in the circumstances and only serves to undermine the targeted modal shift as it encourages reliance of private car use. Furthermore, to achieve additional parking at the site, this would mean encroachments into the student play area, reducing play area by 1,170m^2 (equivalent to 1.16m^2 per student). Refer to **Figure 5**.

Figure 5 Overlay parking on landscape plan
Source: *PTW (2021)*

This outcome is counter to the principles of the Education SEPP as well as the transport strategy for the site, the local area, and the state more broadly. The proposed development is therefore considered to be acceptable regarding operational parking impacts to surrounds.

In addition, although the Centre's observations of all-day parking are refuted, the STP has been updated as a gesture of goodwill to include reminders and suggestions for any staff/parents to not park at this facility, refer to **Section 5.5**. Further oversight of individual drivers' choices is beyond the control of the School operator.

– **Sustainable Travel** – The STP has been revised in response to comments received during exhibition at **Section 5** of the TAIA at **Appendix E**. As mentioned above, the STP has been revised based on recommendations of TfNSW.

This includes both interim targets (for the short to medium term, (or approximately 5 to 10 years) and final targets (for the medium to long term, or approximately between 10 to 15 years). Refer to **Figure 6** below extract of the new modal targets from the updated TAIA.

Travel Mode	Students				Staff			
	Existing Mode Split	Interim Target	Final Target	Volume Change	Existing Mode Split	Interim Target	Final Target	Volume Change
Walk	15%	20%	25%	101	<1%	2%	3%	2
Bicycle	8%	12%	15%	71	<1%	4%	9%	5
Scooter	5%	7%	10%	51	0%	0%	0%	0
Bus	<1%	2%	5%	50	0%	4%	8%	5
Drop-off & pick-up	60%	50%	40%	-202	<1%	0%	0%	0
Park & walk	12%	9%	5%	-71	0%	0%	0%	0
Car (single-use)	-	-	-	-	99%	70%	40%	-35
Car (carpool)	-	-	-	-	-	20%	40%	24
Total	**100%**	**100%**	**100%**	**-**	**100%**	**100%**	**100%**	**-**

Figure 6 Travel mode split targets and volumes
Source: *TTW (2021)*

The STP seeks to change the current mode split to achieve a greater reduction in car-based travel towards active and public transport modes. Substantial reductions

in travel by car are considered realistic and achievable given the existing transport context for the site.

Analysis of depersonalised location data shows that only 23% of the student catchment is outside a reasonable 1200-metre walking distance of the site. If considering a lower reasonable walking distance of 800 metres, only 62% of the catchment is outside this distance.

It is noted that the final targets generate an increase of 46 bicycles and 21 scooter spaces above the currently proposed storage for 106 bicycle and 80 scooters spaces. This is an increase which could be accommodated on the site as uptake of these modes increases over time (medium to long term, or ten to fifteen years).

EOT facilities are not the only mode shift encouragement measure. Additional measures include intentional limitations on car parking capacity, implementation of a dedicated STC role, ongoing consultation, and coordination with local and state transport authorities to discuss and plan for future services, continual data collection and review measures to refine the STP, and more.

It should be noted that the STP is preliminary in nature and is intended to be further developed in line with the recommended conditions of consent provided by TfNSW.

- **Pedestrian Safety** – Although TPSC followed the establishment of the school, to improve pedestrian safety at the north-east boundary of the school, the two corner panels of the fence will be splayed. To further improve sightlines, the landscaping within the new splayed corner will be removed. Refer to the revised landscape plans at **Appendix C** and extract at **Figure 7**.

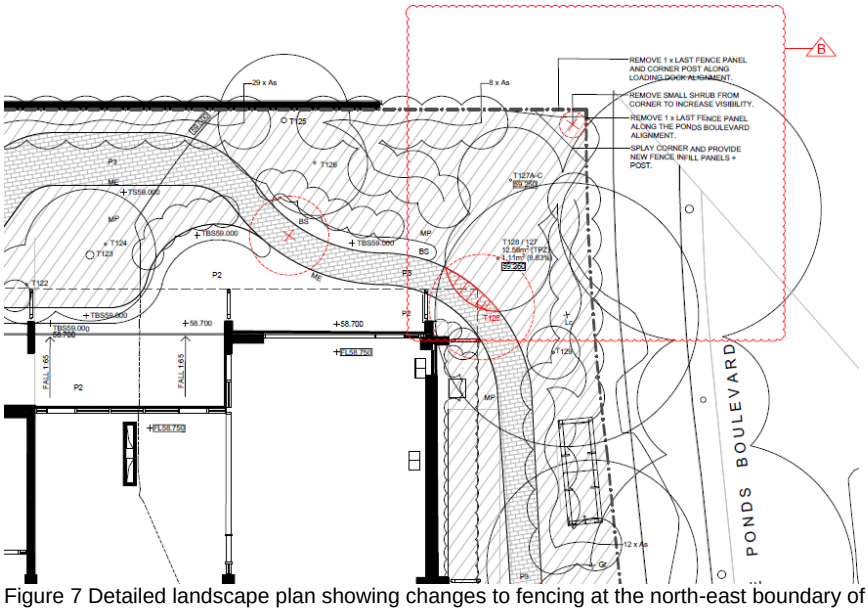

Figure 7 Detailed landscape plan showing changes to fencing at the north-east boundary of the site
Source: *PTW Architects (2021)*

In relation to the new raised zebra crossing on Jetty Street, this is to be approved under the Roads Act 1993 by Blacktown City Council through Council's Traffic Committee. As such, the design will continue to develop through this separate approval process. Nevertheless, the design comments raised by TfNSW are acknowledged and have been responded to in the updated TAIA by TTW at **Appendix E**.

Design and Built Form

- School Infrastructure NSW and PTW architects consulted with the Government Architect NSW Office (GANSW) for the third time on the 17 November 2021. A full schedule of State Design Review Panel (SDRP) feedback and the architect's response is provided in the Architectural Design Response at **Appendix J**. A

response has also been prepared by McIntosh & Phelps to address the advice for the project as specified in DPIE submissions letter, at **Appendix D**.

Noise impacts

- **Operational noise impacts to surrounds** – Section 7 of the Noise and Vibration Impact Assessment Report at **Appendix U** of the EIS, has assessed operational activities associated with the proposed development against noise standards and guidelines, to determine its impact to sensitive noise receivers.

  Although the NPfI is not applicable to noise emission from use of outdoor play areas, the proposed increase of 943 students to 1,012 students results in a predicted increase of less than 1 dB(A), which is imperceptible and is therefore considered acceptable.

  An assessment of noise emission from the use of the hall for a range of activities has been undertaken. It is considered these emissions comply except for a slight exceedance at R2 for high noise level activities. This exceedance is marginal given both the level of exceedance and the likely frequency of events. As there are no changes proposed to the eastern façade of the existing hall, it is unlikely that there would be a significant change in impact from the existing use of the Hall at R2.

  Regarding the school bell/public address system, these selections are yet to be made; therefore, it is not possible to undertake a detailed assessment of the public address and school bell noise emissions. Recommendations have been provided to minimise the impact of external noise emissions associated with the public address and school bell systems of the proposal to the nearest sensitive receivers.

  Noise from mechanical services is consistent with the applicable criteria subject to internally lined ductwork comprising minimum 0.5 metres straight duct to be applied to each outdoor condenser unit discharge. Internal lining is to be minimum 50 mm thick. Noise barriers of 2m height will be installed surrounding outdoor condenser units located on the Northeast, and eastern property boundary.

  Regarding operational traffic noise, the increase in traffic to the site because of the increase in student and staff numbers is expected to be less than 1 dB, which is considered insignificant. Therefore, the traffic impact on access roads from the project is not required to be considered further, as per NSW EPA Road Noise Policy.

  Given the above, the proposed development is not anticipated to have any significant operational acoustic impacts to surrounding developments.

- **Construction noise impacts to surrounds** – Section 5 of the Noise and Vibration Impact Assessment Report at **Appendix U** of the EIS, has assessed construction activities associated with the proposed development against noise standards and guidelines, to determine its impact to sensitive noise receivers.

  All construction works are scheduled to be undertaken during the recommended standard hours only. It is noted that the most affected residences are located along The Ponds Boulevard for the worst-case construction scenarios; although, it is concluded that no receivers are anticipated to be highly noise affected (i.e., exceed an LAeq,15min of 75 dB(A)).

  It is considered that the acoustic impacts associated with the construction and operation of the proposed development can be mitigated, subject to implementation of the recommendations of the of the Noise and Vibration Impact Assessment at **Appendix U** of the EIS.

- **Noise intrusion from adjoining uses** – An Acoustic Response Letter has been prepared by AECOM Australia Pty Ltd to address the noise related items received during exhibition, particularly the noise intrusion from adjoining uses such as the operations of TPSC. Refer to **Appendix F**.

The major environmental noise sources from adjoining uses at TPSC include external mechanical plant, light vehicles entering the underground car park, fork-lift and truck activity in the loading dock and truck movements within the site. Refer to **Figure 8**.

Figure 8 Location map
Source: AECOM Australia Pty Ltd

To determine the existing noise levels from TPSC, noise monitoring was conducted at the approximate location of the proposed new building closest to TPSC. Refer to **Figure 9**. The noise logger was placed at the Location M1 between Thursday 16 December and Wednesday 22 December 2021. An attended measurement was also conducted between 1.45pm and 2.00pm on 22 December 2021, at M2 for a 15-minute period to understand the impact of various sources to outdoor areas.

Figure 9 Measurement locations
Source: AECOM Australia Pty Ltd

The EFSG does not provide a criterion for outdoor learning areas, however the NSW Road Noise Policy's recommended amenity noise level for passive recreational areas is 55 dB(A) and for active recreation is 60 dB(A). The noise level inside the spaces of the proposed new buildings will comply with the internal noise level criterion 35 dB(A).

The unattended measured LAeq,9hr noise level at location M1 was 58 dB(A) during the daytime over the five-day measurement period. The LAeq,15min noise level ranged between 54 dB(A) and 61 dB(A) during the measurement period.

The attended measured LAeq,15min noise level at location M2 was 54 dB(A) during the measurement period. The noise level at M2 include noise from road traffic on The Ponds Boulevard, vehicles entering and exiting the car park, three trucks and activities in the loading dock and vacation care children in the outdoor play area.

During the attended measurement period noise from loading dock activities was subjectively not considered to be intrusive in the outdoor area. During the attended measurement, the noise level from cars entering the underground car park was similar to the noise level from traffic on The Ponds Boulevard. As such, students are not expected to experience noise conflicts with adjoining uses.

In this regard, whilst the noise level in the outdoor area exceeded this level at times, the acoustic environment was subjectively considered to be suitable for outdoor learning and playing activities.

Based on the maximum measured LAeq15 minute noise level at location M1 of 61 dB(A), the internal noise level criteria of 35 dB(A) will be achieved subject to the construction details presented in Section 7.7 of the Noise and Vibration Assessment (reproduced in Section 3.1 of the letter). The façade constructions are to control a traffic noise of 58 dB(A) that was originally identified by the consultant.

Amenity

- **Solar Impacts** – A solar access study was undertaken by PTW Architects at **Appendix H** of the EIS. The solar access study shows the extent of overshadowing from the proposed development to surrounds during the winter solstice. The study shows that the proposed development does not overshadow nearby residential properties along The Ponds Boulevard between 9am to 3pm. Although Council's DCP does not apply, it should be noted that the controls only require consideration of overshadowing impacts to dwellings during these hours.
- **Hazardous materials** – The presence of asbestos was a matter considered in **Section 6.13** of the exhibited EIS, as well as the Detailed Site Investigation (DSI) of contamination on site by Douglas Partners (refer to **Appendix Q** of the EIS).

  The findings of the DSI identified that there was no asbestos detected by observation or by laboratory analysis, either on the surface of the site, or in filling materials at the test locations sampled and analysed.

  However, as with any site, there is always the potential that concealed structures and / or contaminated materials may be present at the site, and this should be considered during bulk earthworks for the proposed development. In this case, an Unexpected Finds Protocol will need to be established for use during earthworks, to ensure that due process is carried out in the event of a possible contaminated find.

  Additionally, the Construction Waste Management Plan prepared for the proposed development (Appendix Y of the EIS) details management procedures for waste streams including hazardous waste materials. It was noted that the buildings proposed for removal and demolition were installed on site post-2006; hence, it is unlikely that these buildings would contain hazardous building materials.

Nonetheless, it is anticipated that the consent authority will impose conditions of consent to ensure that proper handling of any hazardous materials uncovered during construction:

- Construction Waste Management Plan to address the removal of hazardous materials and disposal at an approved waste facility in accordance with the requirements of the relevant legislation, codes, standards and guidelines, prior to the commencement of any building works;
- Applicant to consult with SafeWork NSW concerning the handling of any asbestos waste that may be encountered during construction. Also, compliance with the POEO Regulation 2014 with reference to Part 7 'Transportation and management of asbestos waste'.

Subject to the implementation of these recommendations, it is considered that the site can be made suitable for the proposed development. These mitigation measures are also reiterated in **Appendix B**.

- **Air pollution** – Air pollution from increased traffic was a concern raised in submissions from the public. The transport strategy for the proposed development seeks to minimise reliance on single-occupant car travel by facilitating modal shift, carpooling strategies, and encouraging use of public and active transport. It is anticipated that a combination of these strategies will facilitate a reduced dependency on private motor vehicles, and therefore minimise pollution produced by vehicle exhausts.

  Further, the proposed development has been designed with careful consideration of Ecologically Sustainable Development principles to promote sustainability and minimise environmental damage, such as air pollution.

  Considering this, the proposed development and associated traffic are not anticipated to create significant impacts related to air pollution.

- **Public utilities** – Upgrades to public utilities and augmentation strategies will be implemented prior to occupation, in order to service the proposed development. Refer to the Building Services Infrastructure Report has been prepared by AECOM Australia Pty Ltd and is attached at **Appendix AB** of the EIS.

  Therefore, the proposed development will not result in unacceptable additional pressure on existing public utilities in the area.

<u>Aboriginal Heritage</u>

- No further response is required to be provided noting that Heritage NSW supports the recommendations of the ACHAR at **Appendix L** of the EIS.

<u>Biodiversity</u>

- Submissions received during exhibition raised that there are inconsistencies between the BDAR and EIS in relation to the trees being removed and retained. In response, the BDAR has been revised to address these inconsistencies. Refer to **Appendix G**.

<u>Landscape</u>

- A response to submissions letter has been prepared by McIntosh & Phelps to address landscape related issues raised during public exhibition, at **Appendix D**.

  The landscape architects for the proposed development, McIntosh & Phelps, have investigated opportunities to increase the setback of proposed buildings and pathways along The Ponds Boulevard alignment to the east. With a setback of 2.05m, five additional trees (Trees 2, 3, 4, 7 and 16) along The Ponds Boulevard could potentially be retained. Although, trees numbered 1, 5, 8, 9, 15, 132 and 133 are still unable to be retained based on the 2.05m setback.

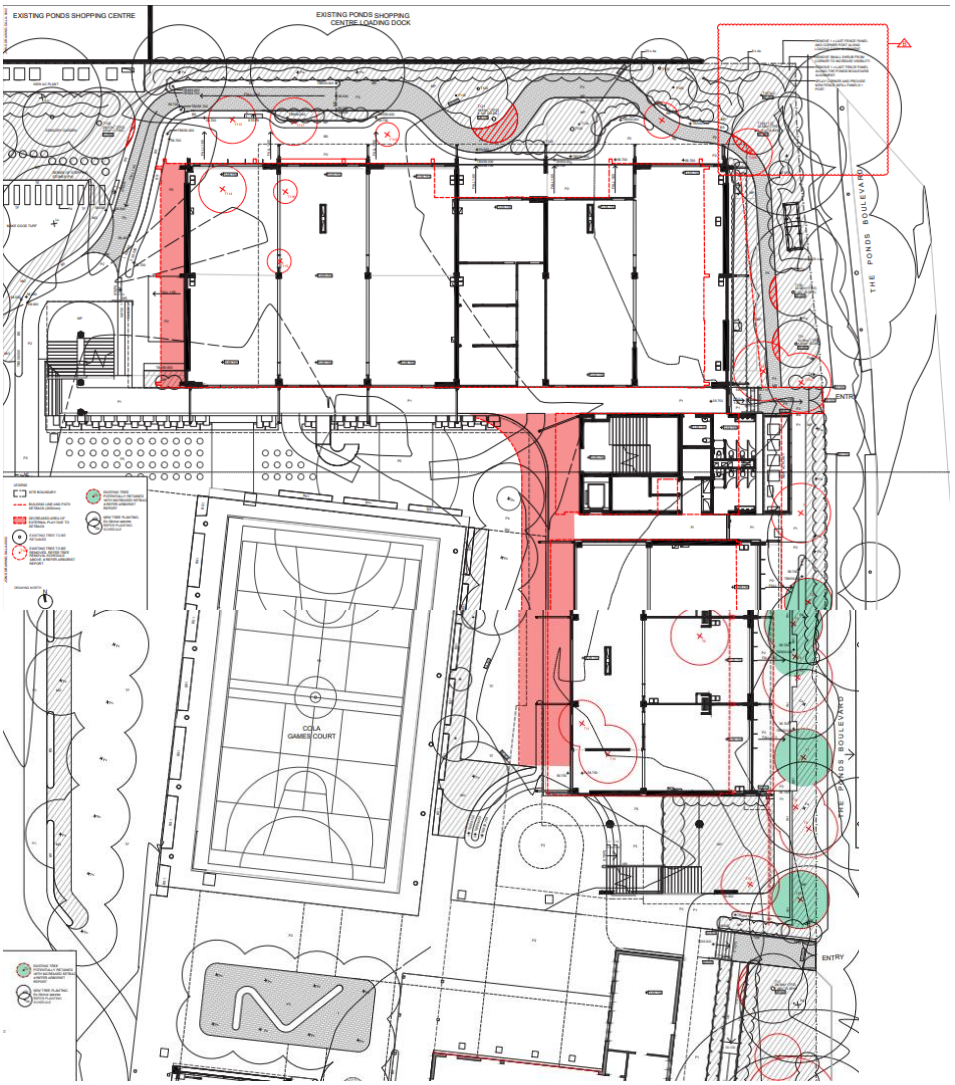

Figure 10 Detailed landscape plan showing potential retention of trees associated with a greater setback and impacts to adjacent outdoor play and learning spaces
Source: McIntosh and Phelps

As can be seen in **Figure 10** above, although an additional setback of 2.05m enables the retention of the above trees, this causes the building to encroach into adjacent play space and learning areas available to the students to the west.

This will compromise the quantity and quality of outdoor learning and play areas which currently envelope the COLA (which is an existing facility). This will also ensure there is adequate separation from the proposed building to the existing COLA.

Figures 11 demonstrates the outdoor play space directly west of the building which will be impacted due to the additional setback. These spaces are included in the play space calculations in **Figure 33** of the Architectural Design Statement, appended as **Appendix I** to the EIS.

Figure 11 3D views of the play area directly west of the new home base building that envelops the COLA
Source: PTW

The proposed planting of 208 trees, 73 of which are species of the Cumberland Plain Woodland community seeks to address the removal of existing trees and greatly improve potential fauna habitat, landscape amenity and reduction of heat island effects on site and within the locality. Therefore, the proposal balances the benefits existing trees offer, whilst avoiding an inferior outcome for students in terms of outdoor learning and play space at the school and ensuring adequate separation of facilities.

In relation to the screen planting around the padmount substation, the landscape design has been modified in response to the recommendations by Endeavour Energy. The screen planting around the padmount substation is now a minimum distance of 800mm plus half of the mature canopy width from the substation easement. All screen planting species have shallow / non-invasive root systems. Refer to the revised landscape plans at **Appendix C** and extract at **Figure 12**.

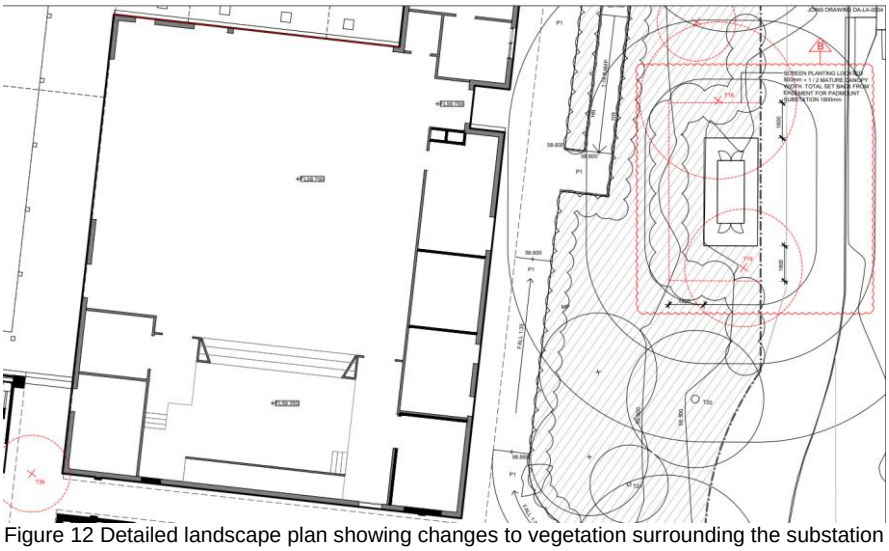

Figure 12 Detailed landscape plan showing changes to vegetation surrounding the substation
Source: *McIntosh and Phelps*

Hence, it is considered that the proposed development has been appropriately modified to suitable address all the relevant concerns raised in the submissions.

Social Impacts

- A Social Impact Assessment has been prepared for the proposed development by Elton Consulting (WSP), at **Appendix N** of the EIS.

  The school is currently operating above capacity. Additionally, many of the core facilities also do not meet the Educational Facilities Standards and Guidelines (EFSG) requirements for the current student population the school. These deficiencies create overcrowding issues at the school which serve to diminish the educational outcomes of existing and future students.

  The proposed upgrade will replace the 20 demountables on site with future focused permanent learning spaces and expand teaching capacity with the addition of 8 new permanent learning spaces. Moreover, the development involves upgrades to core facilities to EFSG Core 35 standards. As such, students will be better supported by educational infrastructure that seeks to enhance the quality of teaching and learning.

  It is noted that the SIA also identifies negative social impacts relating to the current condition of kiss and ride facilities at JPPS and construction noise levels associated with the proposed development. However, such negative impacts have been considered capable of being adequately ameliorated through the implementation of the enhancement and mitigation measures provided in the SIA at **Appendix C** of the exhibited EIS. These mitigation measures are also reiterated in **Appendix B**.

  Overall, the proposed development is likely to result in a positive social impact to the locality. The JPPS is a well-loved element of school infrastructure in the local area, and there is considerable excitement in the school community about the project.

4.4 Justification and evaluation of the project as a whole

- The proposed development replaces existing demountable classrooms and provides additional classrooms along with other facilities to accommodate the proposed student population, whilst increasing existing play space at JPPS. As such, the design results in the economic and orderly development of the site.

  The locality can accommodate the additional demand in terms of services such as water, wastewater, electricity and communications. Furthermore, an assessment of likely impacts of the proposal has revealed that the school can operate in a manner that is unlikely to result in any negative impacts to surrounds, subject to the mitigation measures described in **Appendix B**.

  Therefore, it is considered that the area of the site can sufficiently cater for the proposed development.

4.5 Issues that are beyond the scope of the project

Property values

- Members of the public raised concern regarding the possibility of the proposed development to reduce property values. This is beyond the scope of the project and is subject to numerous other factors that are largely unrelated to the proposed upgrades to JPPS.

5. Project justification

JPPS was established in 2007 following development consent issued by Blacktown City Council on 24 April 2007. It is in The Ponds SCG which lies within the Blacktown City Council Local Government Area (LGA). As such, the proposed upgrades to JPPS have been developed and considered in the context of the broader SCG.

The SCG is projected to experience capacity shortfall of 479 students by 2036, underpinned by the strong population forecasted in the Central City District. The current live-in catchment of JPPS is projected to have a shortfall of 435 students by 2036. This is based on a student capacity of 828 students. In this regard, a capacity of 1,012 would have the effect of reducing the shortfall in the catchment to 251 students.

As indicated in the EIS, a business case was prepared to consider and assess several options for upgrading JPPS. An option was developed that addressed the shortfall in its entirety, however this option was discarded in favour of the current development as the optimal school planning solution for the SCG. SINSW acknowledge that the residual shortfall is to be addressed by a separate intervention at another school within the SCG. In this case, the proposal effectively addresses the proposed capacity of students.

The site is relatively free of many constraints, including, biodiversity, historical archaeological constraints, and/or Aboriginal cultural heritage. In response to submissions received, a Flood Study Report was prepared to determine whether the site is impacted by The Seconds Ponds flooding for the full range of flooding up to and including the probably maximum flood.

Having regard to the Rouse Hill Flood Study, the Flood Study Report notes that the proposed development site is around 5m above the 1% AEP flood height in Second Ponds Creek. Even with an increase in depths due to climate change, the study considers that the site will be unaffected by flooding. However, modelling has revealed that the school site is inundated in the PMF, with a depth of water of around 100mm.

The proposal responds to these constraints through the setting of FFLs above the 1% AEP and PMF so that shelter is possible if a flood event makes evacuation not possible. Further, no flood waters will be adversely diverted when the new building is constructed. Likewise, no increase in flow velocity will be caused as the stormwater flow is not being diverted. Therefore, neighbouring properties, existing assets, and infrastructure will not be impacted post construction of the new building works.

Attempts have been made to retain trees identified for removal along The Ponds Boulevard. Whilst some additional trees can be retained, their retention results in an inferior outcome for the school, as it compromises outdoor learning and play space. It should be noted that their removal does not impact any biodiversity values on the site and will be compensated by new tree planting, which increases tree canopy cover on site. The landscape concept has also been amended in response to SDRP recommendations.

Concerns regarding traffic, parking and sustainable travel have been addressed in an updated TAIA for the school. The TAIA reiterates the original traffic forecasts within the surrounding road network which is considered negligible and acceptable in the context of the local network. Regarding safety, measures have been included in an updated STP that accompanied the TAIA to reduce instances of unsafe driving associated with pick-up/drop-off areas, which have been observed by residents on certain occasions.

Further, in response to concerns raised by Blacktown Council, the fence at the north-east boundary of JPPS has been reconfigured to create a splay that will improve sightlines for vehicles moving northbound and pedestrians approaching TPSC driveway.

Importantly, the STP has been updated in response to TfNSW's submission which recommends a greater shift from private vehicle use to sustainable travel than that

originally proposed. This underscores the role of TfNSW in moving towards sustainability by achieving reductions in emissions, a strategic direction espoused by the Future Transport Strategy 2056. The TAIA notes that any additional parking to service current modal behaviour serves to undermine the targeted modal shift as it encourages reliance of private vehicle use, as well as reducing play space.

Notwithstanding this, the TAIA considers the matter of parking raised in submissions. Although usage of on-street parking is anticipated in the short to medium term as modal shift occurs, on-street parking has good availability during school hours to accommodate the proposal. Further, to achieve a net-zero result, it will only take a minor shift in behavioral change, which is achievable in the near future. On balance of factors, additional car spaces does not result in the economic and orderly use of land.

Potential noise conflicts due to the TPSC have also been considered by the project team. Additional modelling of noise emissions from TPSC have been undertaken which has revealed that students are not expected to experience noise conflicts with the shopping centre, including both outdoor learning and indoor learning spaces, subject to construction details for the main building as presented in Section 7.7 of the original Noise and Vibration Assessment which accompanied to EIS.

Concerns raised by residents regarding hazardous building materials, air pollution, acoustic, social and solar impacts have been considered. These matters have been largely addressed in the original EIS and have also been reiterated in this submission. Any adverse impacts of the proposal can be appropriately mitigated through measures outlined in **Appendix B**. Note, this remains substantially consistent with the original measures in **Appendix C** of the EIS, except for minor refinements relating to the above safety matters.

Having regard to the above, the carrying out of the project is justified for the following reasons:

- The current school has inadequate core facilities that do not meet required standards. The development will provide permanent and state of the art teaching facilities for students and staff that meet current standards and best practice requirements.
- It will increase student capacity at the school, allowing children living in the JPPS catchment to attend the school and ease pressures on other primary schools in the local area.
- It will provide improved and coherent landscaping, greater play space, tree numbers, tree canopy, and shade cover for students. The proposed landscaping will provide urban amenity for users of the space and make a positive contribution to the local character.
- The proposed development will support the health and wellbeing of students at JPPS by integrating new pedestrian and cycling facilities as part of the proposed transport strategy. These interventions will also serve to reduce demand on modes of travel that rely on private vehicles, improving the surrounding road network.
- It will deliver additional support learning spaces to provide greater disability support.
- The proposed development is compatible with the local character. The proposal would not result in adverse amenity impacts on surrounding residents through overshadowing and visual privacy.
- The proposed development will improve pedestrian safety for those travelling along The Ponds Boulevard through the splaying of fence panels at the north-eastern corner of JPPS.
- The proposed landscaping strategy involves net increase in the number of trees across the site which would provide additional tree canopy to the site and shading of outdoor play spaces.

- The new building will be designed to provide a 5-star Green Star Building rating, improving environmental performance of the school.
- It will generate 132 construction and non-construction Full Time Equivalent jobs during construction phase, and 3 additional teaching related positions during operational phase. Hence, these jobs, together with the value of the project, will stimulate the economy.
- The proposed development adequately responds to the submissions received during the public exhibition period.

Given the above it is considered that the SSD Application has merit and can be supported by the Department of Planning, Industry and Environment and the Minister for Planning and Homes.