

9 December 2021

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## **Detailed Submission - New High School at Jerrabomberra (SSD-24461956) Objection to Proposal**

Thank you for the opportunity to comment in relation to the State Significant Development Application (SSD) for the new Jerrabomberra High School.

Please find attached Council's detailed comments on the proposal.

This submission should be considered as an objection to the proposal.

A detailed explanation of why Council formed this view on the application is also included in the attachment. Subject to a satisfactory resolution of those items listed in Schedule 1 of the attachment, Council may withdraw its objection to the proposal.

This submission also includes a list of recommendations for imposition of conditions of consent in Schedule 2.

Should you have any queries in relation to this preliminary submission please contact the undersigned, preferably by email at [Council@qprc.nsw.gov.au](mailto:Council@qprc.nsw.gov.au) with a copy to [Michael.Thompson@qprc.nsw.gov.au](mailto:Michael.Thompson@qprc.nsw.gov.au).

Yours sincerely,



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Natural and Built Character  
**Queanbeyan-Palerang Regional Council**

# **Submission and Comments from Council on Jerrabomberra High School - SSD-24461956**

Council's Ref: PR.2021.1044  
DPIE Ref: SSD-24461956  
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Date of Submission: 9 December 2021

## Submission and Comments for Jerrabomberra High School

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## Detailed Comments

### 1. Permissibility

#### 1.1. Comments

The development is defined as an educational establishment under the *Queanbeyan (West Jerrabomberra) Local Environmental Plan 2013* (the LEP).

The site is zoned part B7 Business Park and part RE2 Private Recreation under the LEP. Educational establishments are permitted with consent in the B7 zone but prohibited in the RE2 zone. Nonetheless, pursuant to clause 2.1 (in conjunction with Schedule 1) of the LEP, the entire site is subject to an additional permitted use clause that allows for educational establishments to be carried out on the land with development consent.

Council can be satisfied that the permissibility of the development is satisfactory.

#### 1.2. Recommendation

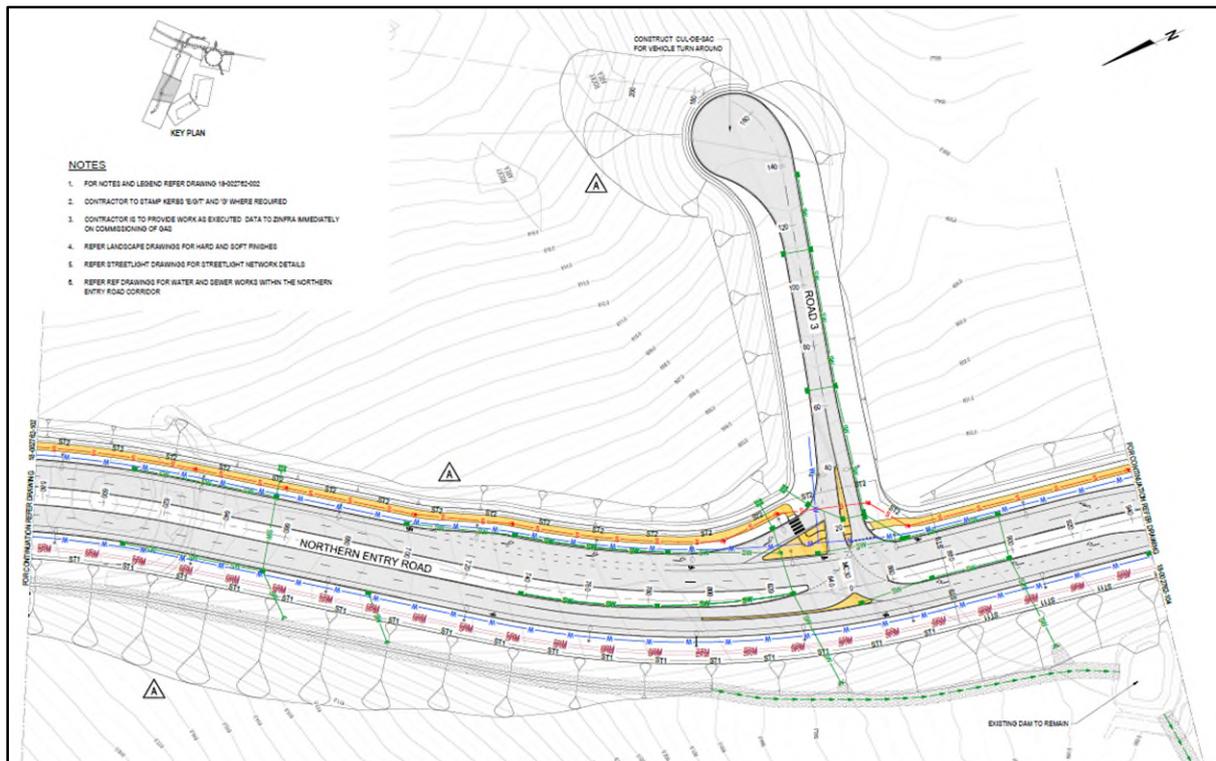
Nil.

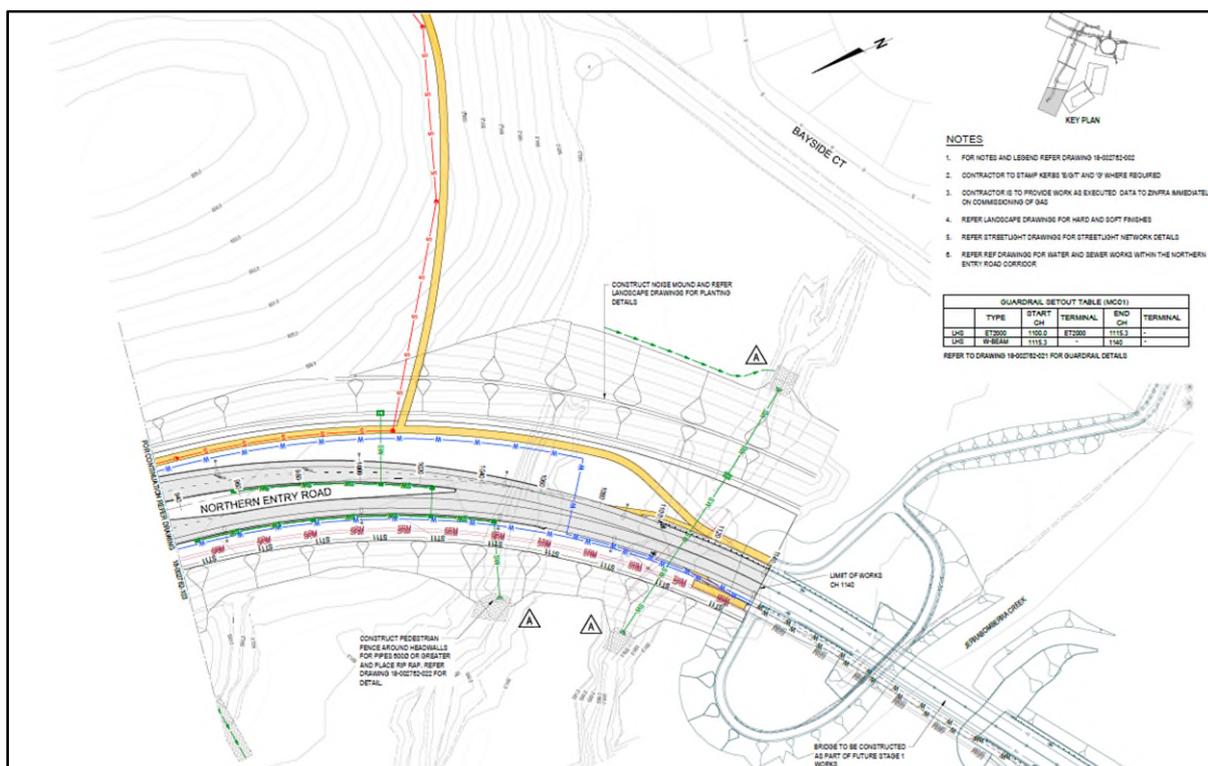
### 2. Utilities

#### 2.1. Comments

The main Council facilities impacted by the development are shown in the extract image below.

- Red – Sewer “S”
- Blue – Water “W”
- Green – Stormwater “SW”





## Services Plans (not WAE) – 300 Lanyon Drive (to become 101 Enviroana Drive) Jerrabomberra

### 2.1.1 Water

The high school development site is within the Jerrabomberra pressure zone and has connectivity to recently constructed 300mmØ DICL potable water main in the eastern verge of Enviroana Drive and northern verge of the north road, associated with the Enviroana Drive project in 2021.

### 2.1.2 Sewer

The high school development site will be serviced by a recently constructed 225mmØ PVC local sewer main in the eastern verge of Enviroana Drive, associated with the Enviroana Drive project in 2021.

Figure 4 in the plan shows sewer connection to manhole S112 near the Bus Zone. The sewer connection should be through a standard connection to the sewer main running towards the rear of the school block.

### 2.1.3 Storm Water

The high school development site can be serviced by a storm water connection to the recently constructed pit (G02) adjacent to the Bus Lane with a 600mmØ RCP drainage pipe connecting to the new infrastructure line in Environa Drive.

The proposed development of the site will increase runoff, thus a stormwater management plan demonstrating the proposed development will not exceed pre-development runoff flow for both 20% and 1% storm events is required in accordance with Council's D5 Stormwater Drainage Design specification, and water quality in accordance with Council's D7 Erosion Control and Stormwater Management Design specification and corresponding computer modelling.

The provided civil plans support the construction of an on-site detention (OSD) tank to accept stormwater from impermeable areas, which is a necessary requirement for this development.

### 2.2. Recommendations

That the consent authority impose conditions requiring:

- Preparation of a hydraulic design plan providing details of the required sizing for all water, sewer and stormwater services required for the site.
- The preparation of an on site detention design to limit stormwater discharge from the site to pre-development flows.
- That all connections and alterations to Council's utility services are inspected by Council staff prior to backfilling.

## 3. Erosion and Sediment Control

### 3.1. Comment

An Erosion and Sediment Control Plan (ESCP) will be required for any works causing surface cover disturbance. An ESCP will be required to be submitted prior to commencement. A Soil and Water Management Plan (SWMP) will be required to be implemented by the property owner for any works causing surface cover disturbance. This requirement applies for all stages of development.

### 3.2. Recommendation

That the consent authority impose conditions requiring the preparation, implementation and maintenance of an erosion and sedimentation plan throughout the construction of the development.

## **4. Traffic and Roads**

### *4.1. Comment*

#### *4.1.1 Traffic Assessment*

The detailed traffic assessment of the proposed high school in Jerrabomberra factored in the large student catchment extending from the NSW/ACT border and including the localities of Jerrabomberra, Tralee, and Googong.

With discussions with TfNSW and QPRC, SIDRA intersection analysis by GHD indicates that the key intersections in the proximity to the proposed high school site will operate with a varied Level of Service with some delays on “no build” and “build” scenarios for;

- Lanyon Drive and Tomsitt Drive.
- Tomsitt Drive, Henry Place and Environa Drive.
- Jerrabomberra Circle.

Council Engineers provided information indicating that the 1,500 lots in the new urban release area in South Jerrabomberra subdivisions are expected to be fully developed within the next 20 years.

The trip rates for the high school were undertaken on a first principles basis in accordance with the current journey to work data and accounted for an occupancy rate of 1.4 students per vehicle. As such, the proposed high school is expected to attract;

- 175 vehicles will access and egress the high school and its surrounds in peak morning and afternoon school hours and that no reduction of trip generation has been applied associated with multiple students per vehicle occupancy.
- 30 vehicles driven by teachers will access the school in the morning peak hour and depart the school in the afternoon peak hour.

Analysis results for the 2023 “no-build” scenario indicate that the signalised intersections (AM and PM school peaks) and the Jerrabomberra Circle in the PM school peak are operating within practical level of capacity with a Level of Service operating from satisfactory and near capacity. Although the Jerrabomberra Circle is operating at a satisfactory Level of Service and the overall roundabout average delay is approximately 40 seconds, in the AM school peak hour, the eastern approach at the roundabout operates at an unsatisfactory Level of Service with average delays of approximately 130 seconds. This is due to the large volumes of traffic entering the roundabout from Edwin Land Parkway and is opposed by high right turn volumes from Tomsitt Drive in the AM school peak hour.

Analysis results for the 2033 “build” scenario indicate that the intersection at Lanyon Drive/Tomsitt Drive is operating within practical level of capacity with a near satisfactory to near capacity Level of Service in the AM school peak hour. In the AM school peak hour, the Tomsitt Drive/Henry Place intersection is operating at capacity with delays Level of Service, with a slight increase in delay when compared to a “no-build” scenario. The Jerrabomberra Circle operation is consistent to a “no-build” scenario, operating with an unsatisfactory Level of Service and increased average delay for the eastern approach in the AM school peak. In the PM school peak “build” scenario, both signal intersections operate at an unsatisfactory Level of Service and average delay recorded at 86 and 111 seconds, respectively. For the Lanyon Drive/Tomsitt Drive intersection, the increase in delay is associated with the large volumes of traffic on Tomsitt Drive, causing congestion throughout the network.

The SIDRA results indicate that the intersections operation in the “build” scenario is consistent when compared to “no-build” scenario for both 2013 and 2033.

Any upgrades to the intersections in Jerrabomberra to facilitate a more acceptable Level of Service should not be the responsibility of the school to fund or implement, and the proposed high school in Jerrabomberra can be supported from a traffic and transport perspective.

#### 4.1.2 *Parking Facilities – Off Street*

In summary the parking proposed consists of:

- 34 car parking spaces provided to teachers and staff in a level carpark and will included two (2) disabled spaces.
- 114 bicycle parking spaces for students that will be located at the northern and southern pedestrian entries of the school.
- The proposal does not include any explanation of how on street parking will be provided other than the drop/off pick up area.

Vehicle access to the high school is from the north road cul-de-sac. Staff and waste collection vehicles will be able to enter the school. Access to the car park will be controlled by a gate and a reader/intercom

In terms of configuration and manoeuvring, the high school development site should meet the requirements of *AS/NZS 2890.1-2004 Parking Facilities Off-Street Car Parking*, *AS/NZS 2890.6-2009 Off-Street Parking for People with Disabilities*, and *Palerang DCP 2015 Section B7.1*. All parking spaces and aisle widths must meet the functionality of the Australian Standard as a minimum.

Of concern to Council is that while 44 staff are employed only 34 parking spaces have been provided, noting that a discount of 10 spaces has been provided based on mode share requirements. This is inconsistent with Council's experience on school sites throughout its local government area. In all cases the number of vehicles being bought by staff to school sites far exceeds the number of onsite spaces being provided and does not take into account the myriad of ancillary staff and casuals who typically attend the school site. Council does not believe the mode share calculations for staff are realistic and that at least the 44 spaces required for each staff member should be proposed. As such Council objects to the proposal on these grounds.

#### 4.1.3 *Parking Facilities – On Street*

Very little has been provided in the Traffic Assessment around the management of on-street parking. Given the width of the north road (8m) and the design of the pick-up and drop off which is requiring vehicles to queue along the north road, there is no capacity for on-street parking on the north road. Outside of the indented 'Pick up and Drop Off' on the north road all other areas of the north road will need to feature 'No Stopping'.

It is unclear where parking is provided for parents during the school zone time who need to park and walk their children into the school and visit the school office. Being a high-school this isn't likely to occur as much as a primary school but parents may still need to park and attend the school or school office during school zone time.

In addition Table 3.2 has calculated that 50 students will drive to the school – and this will likely generate 50 vehicles requiring parking within the vicinity of the school. There is no mention in the Traffic Assessment where the 50 vehicles will be managed around the school that it is planning to generate. The provided car-parking which has 34 spaces is noted as being controlled by an access gate and available only for teachers. The lack of formal planning and close located on-road parking risks illegal and unsafe parking that is heavily dependent on enforcement of Police or Council rangers to monitor and this is not a sustainable or safe approach from the outset.

As the north road is not designed to support parking and the operation of the pick-up and drop-off this means on-street parking is being encouraged and noted for 'Environa Drive'. This road, being a collector road is not designed for on-street parking either and there are no pedestrian facilities to support pedestrians to cross Environa Drive. It is unclear from the Transport assessment how parking can be safely supported adjacent to the school.

The Transport Plan notes that the school will be promoting 'carpooling' and dedicated space will be provided at the high school to encourage 'carpooling'. However, this only appears to extend to the 'teacher parking' area that the 50 vehicles generated by students have no priority or incentive for car-pooling.

Council considers that until such time as a more detailed analysis of where on street parking will occur around the school site is carried out it objects to the proposal on the basis that insufficient consideration has been given to the provision and impacts of on street parking.

#### *4.2. Recommendation*

- That the consent authority request that the applicant submit a design for a minimum of 44 off street carparking spaces. (Objection)
- That the consent authority request that the applicant carry out an analysis of how on street parking will be catered for as a result of the school proposal. (Objection)

### **5. Student Pick-Up and Drop-Off**

#### *5.1. Comments*

The proposed high school student pick-up and drop-off zones will be on the southern side of the north road comprising seven (7) car spaces plus one dedicated space for students with special needs, but do not require ASTP services. Parents/guardians picking up or dropping off their child/children will undertake a U-turn at the eastern end (at the turning head), use the designated facility on the southern side of the north road and exit onto Environa Drive.

The pick-up/drop-off zone will be controlled by No Parking signage (8:00am to 9:30am and 2:30pm to 4:00pm school days) to encourage quick vehicle turnover. Outside of these periods, the pick-up/drop-off zone can be legally used for visitor parking.

The mode share target for students being dropped off is 25% of the student capacity, which equates to 125 students. Factoring an occupancy rate of 1.4 students per vehicle, corresponds to 90 vehicles.

The school peak is expected to occur over a 15-minute period and takes approximately 60 seconds for a student to embark or disembark a vehicle. Subsequently, each car parking space would turn over approximately 15 vehicles resulting in the seven (7) car parking spaces accommodating up to 105 vehicles during the peak 15 minutes of school activity.

There will be opportunities for parents and guardians with special needs children attending the high school and minibuses associated with the NSW's Government Assisted School Travel Plan (ASTP) to pick-up and drop-off their children within the high school staff car park. Although there are no dedicated bays provided for such pick-up and drop-off, provision of ASTP and special needs access within the staff park will provide separation from other parental pick-up and drop-off activity and will occur behind gates which significantly reducing student safety risks to traffic.

The operation of the pick-up and drop-off is dependent on achieving 250 (50%) of the school students and 20% of staff using alternate active transport. This is not a realistic achievement, It is not Council's experience that any of the current schools in the LGA are achieving a 50% active transport mode and it doesn't account for the cold weather climate of QPRC and for inclement weather and the fact that only 5% of school children are estimated to be eligible for SSTS. It also doesn't account for the JTW data that notes the large proportion of residents in Jerrabomberra that drive to work and from a supervision and convenience perspective may choose to drive children to school rather than pay for public transport.

There is no indication in the Transport assessment of how the pick-up and drop-off will operate with less than the achieved active transport targets and lack of consideration for such scenarios, risks introducing safety issues and network efficiencies around the school zone. In particular there is a risk of queued vehicles stacking out onto Environa Drive and leading to unsafe situations such as vehicles queued on the north road dropping off school children in the middle of the street before getting to the indented pick up and drop off area.

The design of the pick-up and drop-off, which is dependent on a maximum active transport take-up, is described as using the north road off Environa Drive for vehicles to queue to use the facility. The north road isn't wide enough to support queued vehicles for the pick-up and drop-off and traffic that is driving through the north road to access the car-park such as teachers and emergency vehicles. The operation of the pick-up and drop off stacking and queueing on a public road that will then restrict access of traffic in a travel lane is not a safe design. This is particularly a concern for emergency/ambulance vehicles that are meant to have safe through access to their designated access point. This design is also a concern for the afternoon 'pick-up' function where parents arrive (often up to 30 minutes prior to school finishing) and have no-where to stack and wait (or park) that will not impact the travel lane on the north road and afternoon pick up risks waiting vehicles stacking onto Environa Drive.

Extending the north road as a through road travelling north would substantially improve the expected impacts.

The Traffic assessment describes the pick-up and drop-off area as a 'designated facility' – it is unclear if this will be indented but it is recommended. Although if this occurs it will need to consider location of existing services such as stormwater pits which may need to be modified or relocated.

Council does not believe the 7 designated spaces of the pick-up and drop off will be sufficient for the capacity.

It is uncertain if the proposed mobility parking spot in the pick-up and drop off facility can meet the required mobility parking standard. It should be noted that the north road has a grade of 8% and would not be suitable for a disabled parking space. AS2890.5-1993 requires the fall for a disabled parking space to be no greater than 1:33 in any direction.

## *5.2. Recommendation*

That the applicant carry out a further review of the drop off/pick up zone to identify the potential impacts of queuing in the north road cul-de-sac and whether additional spaces can be provided. (Objection)

## **6. Other Comments – School Transport Plan**

### *6.1. Comments*

The Governance framework for the STP is concerning. The Transport Assessment Plan notes that there will be two working groups established for the new high school. The internal group are internal staff, parents, students reps, the Road Safety Education Officers and reps from Asset and WHS unit – their role is to identify issues in the operation of the school’s traffic and transport facilities and identify potential mitigation measures. However, it is unclear if any of these staff will have the skills and qualifications to conduct this assessment of traffic operations and traffic facilities. QPRC have attempted in past to implement a supervised Pick up and Drop off at a local school and requested assistance from the Road Safety Education Officer who noted this was outside their area of responsibility. In last 6 years QPRC have not seen any assistance or road safety expertise being provided regarding the traffic facilities and operation in a school zone from Road Safety Education Officer. The internal group are also assessing traffic facilities that will be owned and operated by Council and it would be more appropriate for Council to be conducting such assessment.

The Travel Coordinator role is only funded after 1 year but the STP has responsibilities listed to this position beyond 1 year (annual review of travel modes and evaluation of impact of interventions). It is unclear how the ongoing responsibilities generated around the STP will be managed by the school.

The STP notes annual surveys will be undertaken to capture potential changes in travel modes as result of interventions – though it is unclear what possible intervention could be applied that would result in a drastic increase in active transport uptake particularly during cold weather (which can account for up to 50% of the school year).

### *6.1. Recommendation*

Nil. Comment only.

## **7. Public Transport**

### *7.1. Comments*

A Bus Zone will be provided adjacent to the west of the high school and separate from the Environa Drive traffic flow, minimising the impacts of buses drawing in and drawing out at the school on the through movement of traffic on Environa Drive and students will not be required to cross a road to access the Bus Zone.

There will be a separate pedestrian ingress and egress gate provided for students accessing the school via bus.

In accordance with the geometry of the zone, all buses will access the high school in a north to south direction. Buses for excursions (or similar) will use the school’s designated Bus Zones.

Based on mode share targets approximately 75 students are expected to catch a bus to and from school. This is the equivalent of two buses based on the assumption of approximately 40 students per bus. Accordingly, the Bus Zone will have sufficient capacity to accommodate the expected demand.

Discussions have been initiated with TfNSW and QCity Transit about providing bus services to accommodate the additional demand associated with the proposed Jerrabomberra High School.

Based on these discussions it is noted that:

- For bus services to be determined for a new school, a SSTS Portal needs to be set up by TfNSW.
- The portal will provide parents with an opportunity to apply for free public transport, for students residing outside the 2.9-kilometre catchment.
- Based on that data, appropriate bus routes will be developed with the public transport providers for the new high school in Jerrabomberra. These will account for the public transport needs of the adjacent primary school.
- Bus routes are typically identified within eight months of a school opening.

Section 3.2.1.3 of the Transport Assessment discusses the use of the designated Bus Zone to the west side of the high school for excursion buses. Due to site constraints the construction of the bus zone was unable to include the required deceleration and acceleration lanes required for a 70km/h road. Therefore, the Bus Zone can only be operational during the 40km/h school zone times and will be signposted accordingly.

Entry into the Bus Zone is strictly through the southbound carriageway of Environa Drive. Bus Routes, particularly from South Jerrabomberra, will need to consider current and future road network needs to ensure that bus routes minimise impacts to the road network and school traffic

#### *7.2. Recommendation*

That the consent authority impose a condition requiring the use of the Bus Zone to be restricted to periods during the 40km/h school zone times.

### **8. Crossings and Pedestrian Movements**

#### *8.1. Comments*

North of the school's location, where Environa Drive meets Tomsitt Drive a shopping district is located that features McDonalds, KFC and 7-eleven. Such shops are pedestrian generators for school children before and after school, and this will mean school children walking to and from JHS to these shops will be a natural desire line. Parents commuting to work out of Jerrabomberra via Tomsitt Drive may also choose to drop off their school children at these shops and school children may also be walking in this direction for after-school employment.

The main school entry for pedestrians into the School on the north road is noted in Figure 3.1 of the transport assessment. It is offset and at a distance from the intersection of the north road with Environa Drive. Figure 3.3 features 'future pedestrian crossing facilities' linking to a 'shared path' travelling along the eastern side of 'Environa Drive'. This figure features two crossing points at intersections. From a safety perspective, one mid-block crossing on the north road away from the intersection where vehicles are turning and drivers are making turning movement decisions would provide a better safety outcome for pedestrians – it would also reduce the crossings from two to one.

The lack of a formal pedestrian crossing facility located in close proximity to the main school pedestrian access on the north road risks school children exiting the main gate and streaming across the north road heading in their desire line (north of school to the shopping centre with KFC/McDonalds). This will be a far easier desire line than turning west out of the main gate and walking up to the intersection and crossing across two pedestrian crossings.

The applicant should revisit the location of crossings in the light of the above comments.

The traffic impact study does not cover how it will safely manage and address any pedestrian activity crossing Environa Drive, particularly if the pedestrians are crossing through the bus zone. There is a risk that parents from South Jerrabomberra will choose the convenience of stopping and dropping children off on the western side of Environa Drive as they drive to work. Children will then potentially try to cross Environa Drive where there is a lack of pedestrian crossing facilities for this pedestrian movement. Civil designs should consider installation of pedestrian fencing on the western and eastern side of Environa Drive to discourage drop offs along Environa Drive.

#### *8.2. Recommendation*

- That the applicant be requested to revisit the need and proposed location for a school crossing adjacent to the main school entry off the north road. (Objection)
- That the applicant be requested to provide further information on how the movement of pedestrian from the western side of Environa Drive can be discouraged. (Objection)

### **9. Waste Collection and Deliveries**

#### *9.1. Comments*

Waste collection and deliveries to the canteen will occur within the proposed off street school carparking area.

The swept path of the waste collection and delivery vehicles indicates a three point turn is required within the off street carpark. Swept paths show that three point turns will be very tight within the carpark and there are risks that the collection/delivery vehicle could collide with the carpark gate as well as back into a parked car or pedestrian.

There are no dimensions provided for the carpark to demonstrate it meets design standards. A condition is recommended requiring the carpark and delivery area to meet the appropriate Australian Standards for Medium Rigid Vehicles (10.5m).

Waste collection should occur outside school hours to reduce any risk from the truck and bin movements affecting the school children. Similarly, hours for collection should be restricted to prevent noise impacts on the surrounding residential areas.

Deliveries to the school canteen should be restricted to outside the peak school hours of 8.00-9.30am and 2.30-4.00pm. At the nearby Jerrabomberra Public School, Council has seen deliveries to the school canteen occurring during school zone time, particularly as they are delivering fresh food supplies that often are required by mid-morning break. The 2.2 Table Plan notes that deliveries will be restricted during school zone time but it is unclear if the Canteen has been factored into this strategy.

It is noted that a separate and fenced vehicle access will be provided from the Bus Zone for deliveries to the wood and metal store. Deliveries should be scheduled to occur outside peak periods of school activities to avoid conflicts with the bus zone.

#### *9.2. Recommendation*

- That the consent authority impose a condition of consent requiring waste collection to be between 6:00am – 7:30am or 4.00pm to 7.00pm.
- That the consent authority impose a condition of consent requiring deliveries (excluding waste servicing) to be scheduled between 8:00am to 9:30am and 2:30pm to 4:00pm.

## **10. Entrance and Access**

### *10.1. Comments*

In accordance with the *Queanbeyan DCP 2012 Section 2.2*, the car park appears to demonstrate two way or separate access and egress allowing all vehicles to enter and leave in a forward direction.

Vehicular access into the site will be provided via the north road. Only teachers, staff and waste collection/delivery vehicles will have access to the new access road that will be controlled via a boom gate with a security reader and intercom.

The internal access has been designed based on passenger vehicle manoeuvrability and car park functionality for a standard B99 vehicle. The access off the north road must be designed for heavy rigid 10.5m vehicle manoeuvrability for garbage service.

### *10.2. Recommendation*

That the consent authority be requested to impose a condition requiring the carparking area to be designed in accordance with the appropriate Australian Standard.

## **11. Flooding**

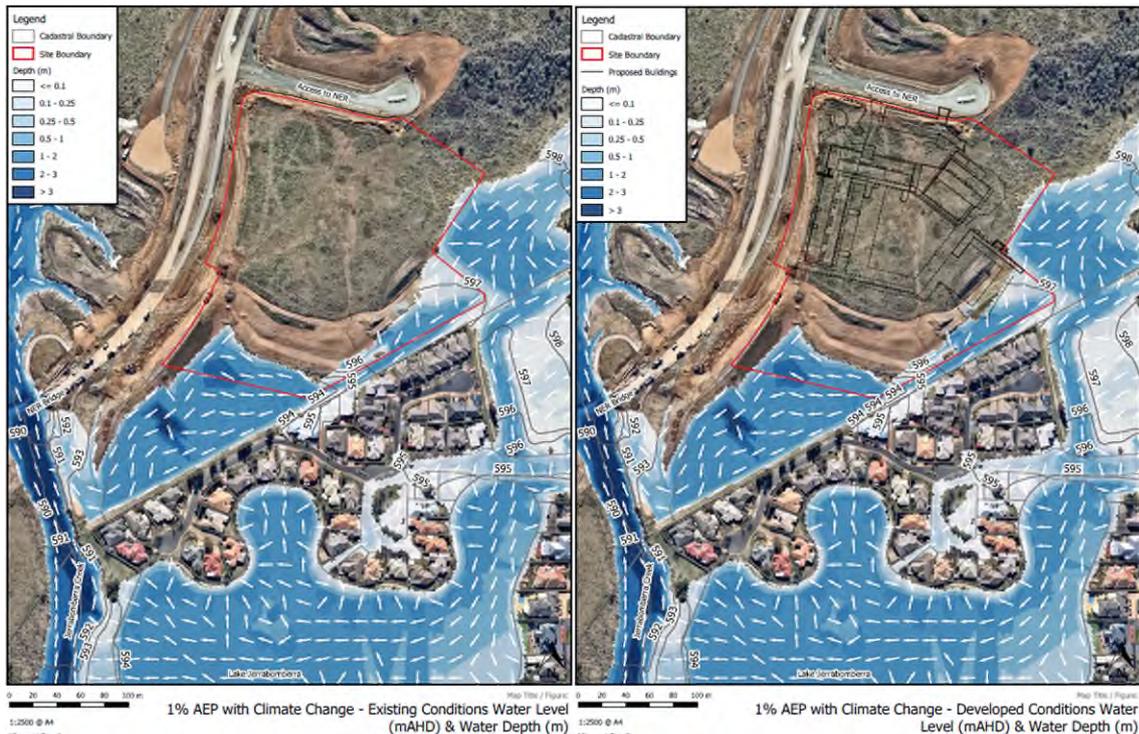
### *11.1. Comment*

DRAINS software package was used with the RAFTS hydrological engine to assess the 1% AEP flood with and without climate change, and probable maximum flood (PMF) peak flow rates for a range of storm durations between 10 minutes and 6 hours.

The critical storm duration for the site was determined to be 1 hour for the 1% AEP flood event with and without climate change. For validation purpose, a 6 hours 1% AEP flood is modelled for the critical storm duration in the Jerrabomberra Creek upstream of the recently constructed NER 1 bridge. As the site is affected by the mainstream flooding during the PMF event, the critical storm duration of 3 hours for the Jerrabomberra Creek was adopted for the flood assessment modelling.

The flooding modelling concluded the following;

- Flood characteristics are consistent with existing conditions, and differences due to the proposed high school development are negligible.
- Flooding on the school site is limited to lower areas for the 1% AEP and PMF events. All school building finished floor levels are above the PMF level.
- The proposed buildings are outside of flood extent in the 1% AEP with and without climate change, and PMF events.
- All building finished floor levels are above the FPL and PMF levels.



## 1% AEP Pre and Post Development – 101 Environa Drive, Jerrabomberra

### 11.2. Recommendation

Nil.

## 12. Developer Contributions

### 12.1. Comment

#### 12.1.1 Section 7.11 Contributions

South Jerrabomberra Local Infrastructure Contributions Plan 2018 – does not apply to government schools.

#### 12.1.2 Section 64 Water and Sewer Contributions

Section 64 contributions would have been levied previously for subdivision of 300 Lanyon Drive, Jerrabomberra with credit calculations based on the land parcel area of 8,358m<sup>2</sup>. Based on these figures and applying the commercial property credit rate of 15 ET/ha for both water and sewer, a credit of 67.5 E.T. was determined.

Subsequently, the following Section 64 contributions were calculated with reference to the NSW Water Directorate Determinations of Equivalent Tenements – April 2017 for secondary school developments on page 33. Before applying any credit and based on a 100% capacity of 500 students and 44 staff, 16.32 ET for Water and 27.20 ET for Sewer was calculated respectively for this development.

Factoring the 67.5 ET credit, the water and sewer headworks contributions for South Jerrabomberra are not applicable.

### 12.2. Recommendations

Nil.

### **13. Bushfire Assessment**

#### *13.1. Comment*

A Bushfire Protection Assessment has been prepared by Eco Logical. The proposal is expected to be acceptable from a bushfire risk perspective, subject to the implementation of standard mitigation measures as outlined in section 7.11.13 of the EIS. The required asset protection zones (APZs) for the surrounding bushfire threats are provided within the site and public road infrastructure. The proposal generates no requirement for additional clearing to accommodate an APZ.

The proposed buildings will need to be designed and constructed in accordance with the relevant bushfire attack level (BAL). In this case, the proposed development is exposed to BAL-12.5.

Eco Logical has assessed the proposal's landscaping, access, water supply, electricity services, gas services, and emergency and evacuation planning, and has found that the proposal complies/can comply with the relevant requirements of PBP.

#### *13.2. Recommendation*

Nil.

### **14. Fire Services/Disability Access**

#### *14.1. Comment*

A BCA and Access Assessment Report was provided with the submission and prepared by Blackett, Maguire & Goldsmith. The report provides an assessment of the proposal against the deemed-to-satisfy provisions of the BCA and identifies matters that are to be addressed by design amendments or performance solutions. Based on the report, it is expected that the proposal can comply with relevant accessibility provisions, either by meeting the deemed-to-satisfy requirements or via a performance-based approach.

#### *14.2. Recommendation*

Nil.

### **15. Section 68 Local Government Approvals**

#### *15.1. Comment*

Generally State government developments are exempt from the need to obtain approvals under the *Local Government Act*. Notwithstanding, there are several matters which would greatly assist the Council if details were provided.

##### *15.1.1 Details of Internal Water and Sewer Services*

As the water and sewer authority Council would normally approve and inspect the internal installation of water and sewer services within the school site. While approval is not required it would be appropriate to include a condition requiring the applicant to:

- Require that all internal plumbing and drainage be inspected by Council (Building Team).
- Require that a works as executed design of the water, sewer and stormwater services for the development be provided to Council for its records.

### *15.1.2 Trade Waste Discharges*

The operation of a school generates liquid trade waste requiring disposal to Council's sewer. Activities such as the school canteen and science laboratories can produce liquid wastes that need to be managed before disposal to Council's sewer.

As the water and sewer authority Council would normally approve and inspect trade waste services installed at the school site. While an approval is not required it would be appropriate to include a condition requiring the applicant to:

- Require that the installation of all trade waste devices and associated drainage be inspected by Council (Building Team).
- Require that a works as executed design of the trade waste system for the development be provided to Council for its records.

### *15.2. Recommendation*

- That the consent authority impose conditions requiring water, sewer and trade waste installations to be inspected by Council staff.
- That the consent authority impose a condition requiring that a copy of the works as executed drawings of the water, sewer, stormwater and trade waste installations be provided to Council within three months of the occupation of the site.

## **16. Building Design and Amenity**

### *16.1. Comments*

It is noted that the proposal penetrates the varying 12.0m and 8.5m LEP height limits applying across the site. Clause 42 of the Education SEPP identifies that consent may be granted for a school that is SSD even though the development would contravene a development standard. As such a formal clause 4.6 variation is not required.

Notwithstanding the above, Council has no objection to the proposed 6.7% variation of the 12.0m limitation or the 5.7% variation of the 8.5m limit given the small proportion of the buildings affected.

It is also noted that a variation has been sought to the setbacks specified in the South Jerrabomberra DCP. Council has no objection to the proposed variation.

### *16.2. Recommendation*

Nil.

## **17. Heritage**

### *17.1. Comments*

An archaeological report prepared by Ecological showed to two potential archaeological sites identified following test excavation, being artefact scatters. Information was gathered to understand the nature and extent of the archaeological deposit and the pattern of Aboriginal land use. Council raises no issues subject to the recommendations of the Ecological report being carried out.

### *17.2. Recommendation*

Nil.

## **18. Contamination**

### *18.1. Comment*

A limited contamination report was prepared by Douglas partners. The report objectives were to identify potential sources of contamination and determine the potential contaminants of concern, identify areas of potential contamination and human and ecological receptors associated with proposed development. It was concluded that the likelihood of gross chemical contamination to be present on the site was low. Soil results for heavy metals were all below the practical limit.

Based on the findings it was considered that site can be made suitable for the proposed school subject to recommended conditions including investigation of stockpiles, preparation and implementation of a Construction Environmental Management Plan (CEMP) and an asbestos finds protocol to be prepared and implemented.

### *18.2. Recommendation*

Nil.

## **19. Other Matters**

### *19.1. Comments*

Council has also reviewed the application in relation to the following matters:

- Biodiversity
- Crime Prevention
- Waste Management
- Ecologically Sustainable Development
- Soil and Water
- Noise

Issues of concern that have been raised in relation to these matters have been adequately dealt with in the EIS and satisfactory mitigation measures implemented where necessary.

### *19.2. Recommendation*

Nil.

## **20. Environmental Health Matters**

### *20.1. Comment*

It is important that food preparation areas throughout the school are constructed in accordance with the relevant NSW Food Safety Standards. As Council will carry out inspections of facilities in the future it would be useful for Council to be provided with design of food preparation areas for its records.

Council also notes the following concerns with the design of amenities.

- There is no visual barrier into the student toilet facilities on levels 1,2 and 3.
- There is no urinal in boys toilets.

### *20.2. Recommendation*

That the consent authority be requested to impose a condition requiring the canteen facilities to be constructed in accordance with the appropriate NSW Food Standards and that Council be provided with a detailed floor plan of all floor preparation areas within the school for its records.

### **Schedule 1 – Summary of Matters Raised in Objection to the Proposal**

Subject to Council being satisfied that the following items have been addressed by the applicant any objection to the High School proposal would be withdrawn.

<b>Relevant Issue</b>	<b>Matter Raised</b>
1. Insufficient off street parking provided.	That the consent authority request that the applicant submit a design for a minimum of 44 off street carparking spaces.
2. The applicant has not satisfactorily demonstrated where on street parking will be provided for the demand generated by the school's activities.	That the consent authority request that the applicant carry out an analysis of how on street parking will be catered for as a result of the school proposal.
3. The applicant has not demonstrated that the north road can satisfactorily cope with the proposed drop off and pick up facilities.	That the applicant carry out a further review of the drop off/pick up zone to identify the potential impacts of queuing in the north road cul-de-sac and whether additional spaces can be provided.
4. Insufficient consideration of the location of the crossing point leading to/from the main entrance gate off the north road.	That the applicant be requested to revisit the need and proposed location for a school crossing adjacent to the main school entry off the north road.
5. The applicant has not provided sufficient information to assess the impacts cause by students being dropped off on the north bound lane of Environa Drive has been assessed.	That the applicant be requested to provide further information on how the movement of pedestrian from the western side of Environa Drive can be discouraged.

## **Schedule 2 - Recommended Conditions of Consent**

### **Recommended Conditions of Consent - Bungendore High School**

#### **Prior to the Commencement of Site Works**

##### **1. Traffic Management**

Prior to undertaking any works within a public road reserve or affecting the road reserve, a traffic management plan is to be submitted to and approved by Queanbeyan-Palerang Regional Council under Section 138 of the *Roads Act 1993*. Where occupancy of the road reserve is required, a Section 138 application shall accompany the Traffic Management Plan for Local Roads or an approved Road Occupancy Licence (ROL) from Transport for NSW (TfNSW) for State Roads.

*Reason: To ensure that works carried out comply with the Roads Act.*

##### **2. Sediment and Erosion Control**

Prior to the commencement of works on site, a Sediment and Erosion Control Plan (S&ECP) for all site works, including road works and access, is to be prepared and approved by the certifying authority. The plan is to cover all measures to control erosion and sediment transport in accordance with the NSW Landcom publication *Managing Urban Stormwater - Soils and Construction (4th Edition 2004 - "Blue Book")*.

Erosion and sediment controls are to be in place before the disturbance of any soils on the site, and are to be maintained during the works and for as long as necessary after the completion to prevent sediment and dirty water leaving the site and/or entering the surface water system outside of the site as follows:

- (a) divert uncontaminated run-off around cleared or disturbed areas,
- (b) erect a silt fence to prevent debris escaping into drainage systems or waterways,
- (c) prevent tracking of sediment by vehicles on roads, and
- (d) stockpile topsoil, excavated material, construction and landscaping supplies and debris within the site.

*Reason: To minimise environmental impact associated with any works & to prevent soil erosion/water pollution.*

##### **3. Temporary Vehicle Access**

Temporary vehicle access to the site must be stabilised to prevent the tracking of sediment onto the roads and footpath. Soil, earth, mud or similar materials must be removed from the roadway by sweeping, shovelling, or a means other than washing, on a daily basis or as required. Soil washings from wheels must be collected and disposed of in a manner that does not pollute waters.

*Reason: To minimise transfer of soil from the site onto the road pavement.*

##### **4. Works Sites to be Fenced**

A fence must be erected between the development site and public places before commencement of any other work.

*Reason: To ensure that an effective barrier is provided to preserve the safety of people and property in public places.*

## **Prior to the Commencement of Building Works**

### **5. Submit an Application for Trade Waste (C5)**

Prior to the issue of the commencement of building works a Trade Waste Application (C5) to install a waste treatment device or devices must be submitted to, and approved by, Council. The waste treatment devices proposed must be able to cater for discharges from the following sources:

- (a) Canteen
- (b) Science Laboratories

The application must include the following details;

- (a) Details and location of all processes, tanks, pits and apparatus associated with the generation of trade waste and,
- (b) Specifications of the treatment system including capacity/dimensions, material of construction and lining of the proposed pre-treatment facilities and,
- (c) Details of pipes and floor drainage conveying the waste and,
- (d) A detailed sewage drainage plan.

*Reason: To ensure compliance with Section 68 of the Local Government Act 1993, Council's Policy for Discharge of Liquid Trade Waste into Council's Sewer 2004/05 and to protect Council's Sewerage System.*

*Note: For further information regarding Trade Waste treatment and discharge please contact Council's Trade Waste Officer.*

### **6. Submit an Application for Trade Waste (C4)**

Prior to the commencement of any building works a Trade Waste Application (C4) for disposal of liquid trade waste into sewer must be submitted to, and approved by, Council.

*Reason: To ensure compliance with Section 68 of the Local Government Act 1993, Council's Policy for Discharge of Liquid Trade Waste into Council's Sewer 2004/05 and to protect Council's Sewerage System.*

### **7. Submit a Construction Management Plan**

Prior to the commencement of building works a Construction Management Plan for the management of soil, water, vegetation, waste, noise, vibration, dust, hazards and risk for the construction works must be submitted to and endorsed by the certifying authority. The plan must:

- (a) describe the proposed construction works and construction program and,
- (b) set standards and performance criteria to be met by the construction works and,
- (c) describe the procedures to be implemented to ensure that the works comply with the standards and performance criteria and,
- (d) identify procedures to receive, register, report and respond to complaints and,
- (e) nominate and provide contact details for the persons responsible for implementing and monitoring compliance with the plan.

*Reason: To ensure that satisfactory measures are in place to provide for environmental management of the construction works.*

## **8. Stormwater Disposal and Water Quality Requirements**

All stormwater from the site must be trapped and piped to the street gutter/stormwater pit/other via an On-Site Detention (OSD) system to limit the discharge from the site to the pre-development rate in accordance with Council's D5 Development Design Specification. Prior to the commencement of building works the design of the OSD service shall be determined by a suitably qualified hydraulic consultant at no cost to Council.

An in-ground Gross Pollutant Trap (GPT) targeting litter is to be installed in accordance with Council's D7 Erosion Control and Stormwater Management Specification.

*Reason: To provide satisfactory stormwater disposal and water quality.*

## **9. Protection of Council Sewer/Stormwater Easements**

Prior to the commencement of building works structural plans must be provided to Council for concurrence as the sewer and water authority. The plans are to demonstrate that the footings of any structure will not be located within the zone of influence of Council's water, sewer and stormwater assets.

*Reason: To allow for safe access and maintenance of services within future easements by Council personnel.*

## **10. Improve Water Quality**

Water quality improvement devices and landscaping are to be integrated into the development including:

- Gross Pollutant Traps to capture litter from car parks, roads and outdoor space.
- Construction of biofiltration swales along the eastern boundaries of the site to filter overland flow
- Native trees to be selected where leaves may enter the stormwater system. Deciduous exotic trees planted along eastern walkway to David Madew Oval to be replaced.
- A buffer is to be provided between mown lawns in public space and stormwater drains. This aims to reduce grass clippings entering the creek and Lake Jerrabomberra.

*Reason: To assist in reducing impact on water quality of Lake Jerrabomberra and Jerrabomberra Creek, in accordance with Jerrabomberra Site Watercourse and Riparian Impact Assessment dated 22 September 2021.*

## **11. Submit a Design and Construction Plan for Canteen Food Preparation Area**

Prior to the commencement of building works a detailed design for the construction of the canteen food preparation area must be submitted to, and approved by Council. Fixtures, fittings, and equipment must be provided so as to be capable of being easily and cleaned without causing a risk to food safety.

The plan should include the following details:

- Floor plan - to a suitable scale (e.g. 1:50).
- Finishes to floors, walls and ceilings
- Sectional elevation drawings - to a suitable scale (e.g. 1:50) showing all fittings and equipment.
- Hydraulic plans (plumbing details) - to a suitable scale (e.g. 1:50).
- Mechanical exhaust ventilation drawings (i.e. plans, elevation and schematic diagrams, where applicable) - to a suitable scale (e.g. 1:50).

*Reason: To ensure compliance with Food Act 2003 and Regulations 2015, Food Standards Code and relevant Australian Standards.*

## **Conditions to be Complied with During Construction**

### **12. Hours of Operation for Works**

All works associated with the construction and/or demolition of this development must be carried out between the following hours unless Queanbeyan-Palerang Regional Council agrees in writing. A written application shall be made to Queanbeyan-Palerang Regional Council if a variation of hours is required.

Weekdays: 7.00am to 6.00pm

Saturdays: 8.00am to 4.00pm

Sundays and Public Holidays: NIL

*Reason: To reduce the chance of offensive noise being created and to minimise the impacts of the development in its locality.*

### **13. Approval Documents**

Keep a copy of all stamped approved plans, specifications and documents on site while work is being undertaken.

*Reason: Relevant documentation is available for perusal on site by a council officer, for compliance check.*

### **14. Work in Accordance with Engineering Specifications**

All construction and restoration work must be carried out strictly in accordance with the approved drawings and Council's Design and Construction Specifications.

*Reason: To ensure construction and restoration work is in accordance with Council's requirements.*

### **15. Provide Water Service and Water Meter**

A new main water meter and water service shall be installed by Council at no cost to the Council. The size of the meter and service shall be determined by a suitably qualified hydraulic consultant at no cost to Council.

The main meter shall be installed in an easily accessible position in the common property at the front of the site, or other accessible position approved by Council.

*Reason: To ensure that the development is appropriately water metered.*

### **16. Inspection of Council Utility Services**

All connections and alterations to Council's water, sewer and stormwater services shall be inspected by Council's Development Engineering Team prior to backfilling. This includes the inspection of the orifice plate and connection to Council stormwater infrastructure.

*Reason: Ensure on-site detention is constructed in accordance with the Council specification.*

### **17. Dust Management**

Throughout construction works undertake all measures as appropriate to provide dust suppression on roads leading to, adjacent to and within the site in the event that weather conditions, construction activities and associated traffic to and from the site are giving rise to abnormal generation of dust.

*Reason: To ensure that local residents and activities are not disadvantaged by dust during hours of operation.*

## **18. Unauthorised Use of Public Land**

No building materials are to be stored or construction activities undertaken on public or adjoining land without prior written approval from Council.

*Reason: To prevent unnecessary disturbance to public land.*

## **19. Work on Adjoining Land is Limited**

The verge and other adjoining lands must not be used for storage of materials or disturbed by construction activities except for;

- a) Installation of a temporary, stabilised construction access across the verge,
- b) Installation of services,
- c) Construction of an approved permanent verge crossing.

*Reason: To minimise interference with the verge and its accessibility by pedestrians.*

## **20. Construction Waste Management**

All waste materials generated on-site during construction are to be stored in enclosed containers and deposited in an approved landfill at regular periods.

*Reason: To ensure adequate waste management practices are in place during the construction phase.*

## **21. Surface Water**

Do not re-direct surface water onto adjoining private land. Alterations to the surface contours must not impede or divert natural surface water run-off, so as to cause a nuisance to adjoining property owners or create an erosion or sediment problem.

*Reason: Stormwater disposal does not impact on the building or neighbouring properties.*

## **22. Construction And Fitout Requirements**

Canteen food preparation, sale and storage areas must be constructed and fitted out to comply with the requirements of the:

- (a) *Food Act 2003;*
- (b) *Food Regulations 2015;*
- (c) *Australia New Zealand Food Standards Code; and*
- (d) *AS1668.2 - The use of ventilation and air conditioning in buildings - Part 2: Ventilation design for indoor air contaminant control*

*Reason: To ensure safe and hygienic food preparation/storage and compliance with Food Act 2003 and Regulations 2015, Food Standards Code and relevant Australian Standards.*

## **23. Car Parking to Comply with AS/NZS 2890**

All car parks must comply with AS/NZS 2890.1-2004 Parking Facilities Off-Street Car Parking, AS/NZS 2890.6-2009 Off-Street Parking for People with Disabilities.

Pavement line marking with bay dimensions to comply with AS/NZS 2890.1-2004 and AS/NZS 2890.6-2009, must be shown within the car parking areas to delineate parking bays, including signage for the accessible parking bays.

*Reason: To provide adequate off-street car parking.*

## **24. All Surfaces to be Concrete or Asphalt Surfaced**

All parking spaces, loading bays, driveways and turning aisles must be concrete or asphalt surfaced, with all parking spaces line marked.

*Reason: To ensure car parking spaces are functional prior to use of the premises.*

## **25. Lighting in Car Parks and Public Spaces**

Lighting throughout the car parking area and in public spaces must comply with AS/NZS 2890.1:2004 - Parking Facilities - Off-Street Car Parking, and AS/NZS 1158 - Lighting for Roads and Public Spaces.

*Reason: To ensure the provision of adequate lighting within the development*

## **Prior to Occupation of the Site as an Operational High School**

### **26. Works as Executed (On-Site Detention System)**

Prior to occupation Works as Executed drawings of the constructed on site detention system certified by the designer are to be submitted to Council accompanied by evidence of any restriction of land use of the land and positive covenant over the lot in favour of Council.

*Reason: To ensure on site detention is constructed in accordance with the designed system and that its ongoing maintenance is enforceable by law.*

### **27. Repair Damaged Public and Private Property**

All damage caused to public and private property during the construction operations and associated activities must be repaired or reinstated prior to occupation of the development.

*Reason: To ensure that all public and neighbouring private property in the vicinity of the development is maintained in its pre-development condition.*

### **28. Water and Sewer Compliance Certificate - Construction**

Prior to occupation of the development a compliance certificate in accordance with the Water Management Act 2000 must be obtained from Council.

*Reason: To ensure the constructed infrastructure and services have been completed to Council's specifications.*

### **29. Sewage Connection**

Prior to occupation of the development connect the premises to Queanbeyan-Palerang Regional Council's sewerage infrastructure.

*Reason: To ensure that premises are connected to available domestic sewerage system.*

### **30. Comply with Waste Management Plan**

The development is to comply with the submitted Operational Waste Management Plan dated 17 September 2021.

*Reason: To ensure the impacts of waste generated by the development are managed accordingly.*

### **31. Submission of Litter Management Plan**

Prior to occupation of the development the applicant shall submit to Council a litter management plan detailing how the school will manage litter around the school and fringes of the building and property boundary. The plan shall include a regular schedule for litter pickup and a maintenance schedule for litter bins placed around the facility. Following occupation this litter management plan shall be adhered to.

*Reason: To ensure that the school and building surrounds are kept free from litter whether generated onsite or from surrounding sites.*

### **32. Waste Conditions**

The school is encouraged to contact Council's Waste Officer to assist with the following elements of the school's waste management plan:

- Signage for waste bins at school to ensure it is consistent with Council's waste service so that students are getting the same message at home and at school.
- Council provides a number of waste education programs that are available for the school
- To assist with finding option for recycling plastic wrap, soft plastics and polystyrene.

*Reason: To maximise waste reduction strategies at the school.*

### **33. Installation of No Stopping Signs**

No stopping signs shall be placed on all sections of the north road not occupied by drop off and pick up parking.

*Reason: Ensure that the north road does not become congested and impact on the safety of school students..*

### **34. Provision of Works as Executed Drawings**

Within three months of the occupation of the site, works as executed drawings for all internal water, sewer, stormwater and trade waste installations be shall be provided to Council for its records.

*Reason: To ensure that Council has permanent records of internal services for the future reference of trade and other professionals.*

## **Conditions Applying to the Ongoing Operation of the School**

### **35. Maintain Car Parking Areas and Driveway Seals**

All sealed car parking areas, loading bays, manoeuvring areas and driveways must be maintained in a trafficable condition, including pavement line marking

*Reason: To ensure car park areas are useable.*

### **36. Vehicle and Goods Storage Confined to the Site**

All loading and unloading activities in connection with the development must be carried out wholly within the site and all goods and vehicles associated with the development must be accommodated wholly within the site.

*Reason: To ensure free flow of vehicular and pedestrian traffic on the road and the verge.*

### **37. Car Parking Spaces to be Kept Free at all Times**

All car parking spaces, loading and unloading areas, vehicle manoeuvring and driveway areas must not be used for the storage of any goods or materials and must be available for their intended use at all times. The operator of the development must ensure that all vehicles associated with the development are parked within the site in the approved car parking area as line marked.

*Reason: To ensure such areas are available for occupants and visitors of the site and parking on site is used for the development.*

### **38. Delivery Times to Canteen**

Deliveries to the school site shall not be carried out between 8.00am-9.30am and 2.30pm-4.00pm.

*Reason: To ensure that deliveries are carried out at times when they do not create a danger to students.*

### **39. Waste Collection Hours**

Waste collection shall be limited to between 6:00am to 7:30am and 4.00pm to 7.00pm Monday to Saturday.

*Reason: To ensure that waste collections are carried out at times when they do not create a noise nuisance to neighbours or a danger to students.*

### **40. Waste Collection Hours**

The Bus Zone shall only be operational during the 40km/h school zone times and shall be signposted accordingly.

*Reason: Due to site constraints the construction of the bus zone was unable to include the required deceleration and acceleration lanes required for a 70km/h zone and as such is only suitable for use at times when the 40km/h limit is in place.*