

Submissions Report
New High School in Jerrabomberra
SSD-24461956

On behalf of
NSW Department of Education
March 2022





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*This document is for discussion purposes only unless signed and dated by the persons identified.

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Executive Summary

This Submissions Report has been prepared by Mecone NSW Pty Limited on behalf of the NSW Department of Education to support the proposed new high school in Jerrabomberra (SSD-24461956).

The Environmental Impact Statement (EIS) for the project was exhibited from 12 November 2021 to 9 December 2021. A total of 4 submissions were received including 3 submissions from individual members of the public and 1 submission from a public authority (Queanbeyan-Palerang Regional Council). Additionally, advice was received from 5 government agencies.

Key issues raised by the submissions and agencies included quantity of parking, pedestrian safety and movement, façade articulation, equitable access, adequacy of the Biodiversity Development Assessment Report (BDAR), and aviation wildlife hazard.

The project team has provided additional information and refined the design to address the issues raised. Key design refinements include the addition of 10 parking spaces (increasing the total of on-site parking from 34 to 44), further articulation of the Building A façade, and addition of a pedestrian ramp with rest stops from the David Madew Oval entrance. Other minor design refinements have been made as a result of design development.

An updated BDAR has been prepared to reflect the Biodiversity Assessment Method 2020 (rather than 2017). The key findings of the BDAR remain unchanged compared to the originally submitted BDAR.

An Aviation Wildlife Hazard Assessment has been prepared at the request of Canberra Airport to consider whether the school would attract birds that may affect aircraft safety. The assessment has recommended measures for minimising attraction of hazardous species, including changes to the landscape scheme. These measures have been incorporated into the design.

The mitigation measures provided as part of the EIS generally remain relevant, with only the mitigation measures relating to construction parking and pedestrian movement requiring updates. It has been clarified that parking for construction workers will be provided on site, sufficient to accommodate the expected demand. Additionally, it has been clarified that 'No Stopping' signage and fencing will be used to discourage student drop-off on the western side of Environs Drive.

Overall, the proposal as refined will result in a high-quality development that achieves the original aims of the proposal while resulting in no unacceptable environmental impacts.

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Appendix 6: Updated BDAR by Capital Ecology
Appendix 7: SDRP Response by TKD
Appendix 8: Acoustic Response Letter by Acoustic Logic
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1 Introduction

This Submissions Report has been prepared by Mecone NSW Pty Limited on behalf of the NSW Department of Education (DoE) (the proponent) to support the proposed new high school in Jerrabomberra (SSD-24461956).

The Environmental Impact Statement (EIS) for the project was exhibited from 12 November 2021 to 9 December 2021. A total of 4 submissions were received including 3 submissions from individual members of the public and 1 submission from a public authority, Queanbeyan-Palerang Regional Council (Council). Additionally, advice was received from 5 government agencies.

The Department of Planning and Environment (DPE) addressed a letter to the proponent dated 20 December 2021 outlining key issues and requesting a response to the submissions and agency advice received during exhibition of the EIS.

This Submissions Report addresses the issues raised in DPE's letter and in the submissions and agency advice received during exhibition. This report also describes design refinements made to the development since lodgment of the EIS.

This report has been prepared having regard to the State Significant Development Guidelines (DPE, 2021).

2 Analysis of submissions

A total of 4 submissions were received:

- 3 from individual members of the public (2 supports and 1 comment).
- 1 from a public authority (Council) (objection).

Additionally, advice was received from 5 government agencies including the Biodiversity Conservation Division (BCD), NSW Environmental Protection Agency (EPA), Rural Fire Service (RFS), Transport for NSW (TfNSW) and Heritage NSW.

Regarding the public submissions, one submission was made after the end of the exhibition period. No information was provided regarding the geographic location of the author of this submission. The other 2 public submissions were made by residents of Jerrabomberra.

No submissions from organisations were received.

No petition letters or form letters were received.

3 Actions taken since exhibition

3.1 Design refinements

A number of design refinements have been made following lodgement of the EIS in response to issues raised during exhibition and as a result of design development. Table 1 describes these refinements. Updated architectural, landscape and civil drawings illustrating the changes are attached at Appendices 1, 2 and 3, respectively.

Table 1. Design refinements

Design refinement	Reason
Addition of 10 parking spaces (carpark extended to the east).	The 10 parking spaces have been added in response to Council's concerns regarding insufficient parking. Council specifically recommended that a minimum

Design refinement	Reason
Total parking spaces increased from 34 to 44 spaces.	of 44 spaces be provided. Refer to section 4.2 below for further detail.
<p>Additional articulation of Building A to reduce the visual bulk and increase ventilation. Key changes include:</p> <ul style="list-style-type: none"> • Roof modified (lowered in two sections) to provide greater expression of separation between building volumes. • Sunshade design modified (Blocks A and B). • Revisions to fenestration and associated minor adjustment to the size of the feature screens. • Revised colour scheme for the exterior affecting sunshades and some areas of cladding. 	These refinements were made to address the State Design Review Panel's (SDRP's) recommendation as expressed in DPE's key issues letter. For further detail, refer to TKD's response at Appendix 7.
New ramp access with rest stops from David Madew Oval entrance.	This change was made to address concerns raised by the SDRP regarding equitable access. Refer to TKD's response document at Appendix 7 for further detail.
Some tree species changed in landscape scheme. Specifically, <i>Juglans nigra</i> , <i>Pistacia chinensis</i> and <i>Quercus palustris</i> have been removed from the planting schedule.	This change was made to address recommendations made in the Aviation Wildlife Hazard Assessment (Appendix 4). The object of the change is to reduce the risk of attracting bird species that pose a hazard to aircraft.
<p>Other minor design refinements:</p> <ul style="list-style-type: none"> • Reduced building footprints and height of Blocks A and B. • Deletion of eaves overhangs to all blocks. • Minor repositioning of Block C and southern vehicular access ramp. • Squaring of external stair geometry. • Miscellaneous landscape revisions. • External adjustments associated with support unit re-planning including bus bay entrance stair and ramp repositioning, and deletion of superfluous stair and ramp to support unit terrace. • Minor re-planning of: <ul style="list-style-type: none"> ○ Building A south wing store/printer room, staff amenities and dust extraction. ○ Building A north wing lower ground floor. 	These changes are the result of design development.

Design refinement	Reason
<ul style="list-style-type: none"> Building B amenities. 	

3.2 Consultation

Table 2 outlines key consultation activity that has occurred since lodgement of the EIS.

Table 2. Additional consultation

Consultation activity	Outcome
<p><u>Canberra Airport</u></p> <p>The project team consulted with Canberra Airport via email regarding potential impacts.</p>	<p>Canberra Airport confirmed via email that its aviation team has conducted an aviation safety impact assessment and do not require the proposal to be referred to Airservices Australia formally.</p> <p>The airport also advised that it endorses the proponent's choice of consultant for the purposes of addressing Guideline C of the National Airports Safeguarding Framework, which relates to wildlife strike risk.</p> <p>An Aviation Wildlife Hazard Assessment prepared by the endorsed consultant is attached at Appendix 4. Refer to Item 4 in Table 3 below for a summary of the assessment and how the project has responded to the assessment's recommendations.</p>
<p><u>TfNSW</u></p> <p>The project team consulted with TfNSW over Microsoft teams on 18 February 2022 regarding bus services for the new school.</p>	<p>Demand for bus services were discussed during the meeting, however it was not possible at that stage to estimate what services will be required from private operators without an estimate of student numbers and estimated distances (eligibility).</p> <p>Confirmation from the Department of Education (DOE) regarding a timeline for student registration and dates the students can be enrolled from will be required.</p>

4 Response to submissions and agency advice

4.1 Response to DPE key issues

Following its initial assessment of the proposal and review of submissions, DPE commented on a number of key issues in a letter to the proponent dated 20 December 2021. Table 3 provides responses to these key issues.

Table 3. Response to DPE key issues

Key issue	Response
1. Traffic, Transport and Access	
<p>The EIS identifies that:</p> <ul style="list-style-type: none"> short term construction worker parking would be provided within the North Road cul-de-sac subject 	<p>As discussed in GHD's response at Appendix 5, there will be parking for approximately 100 construction vehicles within the site. Preliminary estimates indicate that this will be sufficient for the construction workforce, with no parking on the cul-de-sac required.</p>

Key issue	Response
<p>to approval of a Works Zone application</p> <ul style="list-style-type: none"> longer term construction worker parking should be made available within the construction site boundary or within the David Madew Park carpark subject to consultation with Council. 	
<p>The Submissions Report must further address potential construction vehicle parking impacts in instances where there is likely to be overflow on-street parking required (i.e. parking in David Madew Park carpark is not supported by Council). Provide further information on mitigation measures to ensure that construction worker parking does not significantly impact existing on-street parking availability for other users.</p>	<p>As noted above, sufficient construction worker parking will be provided within the site. GHD notes that, should the unlikely need arise, additional onsite overflow parking can be accommodated to prevent disruption to on-street or David Madew Oval conditions. All staff and subcontractors engaged on site will be required to undergo a site induction, during which they will be instructed to only park within the designated onsite car parks.</p>
<p>Provide further assessment on whether the local road network can accommodate the construction vehicle routes.</p>	<p>Further assessment has revealed that the local road network is capable of accommodating construction vehicles. The vehicle activity associated with the workers and heavy construction vehicles is within typical fluctuations of vehicle activity on the adjoining road network and will result in only a very minor impact on the nearby intersections. Also, as part of the head contractor's site induction process, drivers will be advised on the designated haulage routes. Refer to GHD's letter at Appendix 5 for further discussion.</p>
<p>Provide details on how safety has been considered for the movement of pedestrians to the school, including the drop-off and pick-up of students from the western side of Environa Drive.</p>	<p>GHD has consulted with Council officers on this matter. Council supports the placement of No Stopping signage along Environa Drive in proximity to the school. Additionally, fencing will be provided either along the eastern side or within the median of the road to discourage drop-off and pick-up from the western side. Refer to GHD's letter at Appendix 5 for further discussion.</p>
<p>Provide an updated assessment to include the consideration of traffic impacts associated with the proposed Tralee residential development.</p>	<p>The intersection modelling completed by GHD in the Traffic Assessment submitted with the EIS accounted for the vehicle activity associated with the Poplars and Tralee developments. The analysis was based on land use data provided by Council. Council reviewed the modelling during exhibition of the EIS and provided no further comments.</p>
<p>Address all issues raised by Council and TfNSW in relation to traffic, transport, access and car parking.</p>	<p>Refer to relevant sections of this report below.</p>

Key issue	Response
2. Design and Built Form	
<p>The Government Architect NSW has advised that the proposal has not adequately addressed a number of matters raised in the State Design Review Panel (SDRP) advice dated 15 July 2021.</p> <p>The following recommendations of the SDRP advice must be addressed:</p> <ul style="list-style-type: none"> Recommendation 7c – the response does not include any options testing, and the recommendation to explore how the connection between the David Madew Oval and the school is connected and inclusive has not been adequately addressed. Options to provide an inclusive and equitable connection between the Oval and the school must be explored. 	<p>The connection to the David Madew Oval has been addressed within the constraints presented by the topography of the site. A series of ramps compliant with the enhanced requirements of AS 1428.2-1992 have been provided adjacent to the steps, ensuring that all users have choice to address the level change in the way most appropriate to their needs or disability. The ramps meet the EFSG requirement to provide landings at 6m intervals (in lieu of 9m intervals as per the requirements of the BCA) to ensure the route is suitable for students or users who might tire more easily. Rest points with seating are incorporated at a maximum of 50m intervals along the ramped route, to allow an opportunity for students and staff to rest and recover, extending the ability to comfortably travel longer distances. Refer to TKD's response at Appendix 7 for further discussion.</p>
<ul style="list-style-type: none"> Recommendation 9 - the response has not considered alternative options to provide accessible access between the Social Plaza and the Lower Terrace that feels more inclusive and equitable. 	<p>The school campus has been designed to allow for optimum accessibility with consideration of the site contours.</p> <p>The lift and adjacent main stair, which are centrally located and connect all levels of the school, are located in close proximity to the social plaza and creative play space, providing a legible, pragmatic circulation route.</p> <p>To transition the steep level change between the Creative Play space and Social Plaza would require a large network of ramps, removing a significant portion of the central courtyards green space. This option, therefore, was deemed detrimental to the quality of the external space.</p> <p>An alternative accessible route from the Social Plaza to the Creative Play is provided to the south of the plaza in the event the lift is unable to be used.</p>
<ul style="list-style-type: none"> Recommendations 11 and 12a – opportunities must be pursued to articulate the volume of Building A along Environa Drive to reduce the visual bulk and allow for more opportunities for natural ventilation. 	<p>Building A has been further articulated to reduce visual bulk and allow for more natural ventilation. This has been achieved through breaks in the building form and revisions to the fenestration. Refer to TKD's response at Appendix 7 for further detail and also the description in Table 1.</p>
3. Biodiversity	

Key issue	Response
The Biodiversity Development Assessment Report (BDAR) has been prepared in accordance with the Biodiversity Assessment Method (BAM) 2017. However, as transitional arrangements no longer apply, the BDAR must be updated to reflect the BAM 2020. The updated BDAR must also address the issues raised in the advice from the Biodiversity and Conservation Division.	<p>The BDAR has been updated (Appendix 6) to reflect the BAM 2020 and to address the issues raised in the advice from the Biodiversity Conservation Division.</p> <p>The key findings of the BDAR have not changed in the updated report. As per the original assessment, the proposal will result in clearance of 1.79ha of exotic pasture and 1.46ha of low-quality Box-Gum Woodland, which serves as Golden Sun Moth habitat. It has been clarified that the exotic pasture supports a small native component, but this has not affected the overall assessment.</p> <p>Under the BAM scheme, this clearance results in zero ecosystem credits and 9 species credits for impacts to the Golden Sun Moth habitat. The 9 species credit obligation has already been met as part of DA 332-2015 for subdivision of the site.</p> <p>Consistent with the original assessment, the updated BAM has found that the proposal is unlikely to have any serious and irreversible impacts (SARs) on any threatened species or ecological communities.</p>

4. National Airport Safeguarding Framework (NASF) Guideline

Canberra Airport has requested that the submitted Aviation Assessment be updated to address 'Guideline C – Wildlife' of the National Airport Safeguarding Framework (NASF) Guidelines. This can be addressed either through a wildlife assessment, or by engaging a qualified Ornithologist to review/monitor potential bird attracting activities/plantings.	<p>An Aviation Wildlife Hazard Assessment has been prepared (Appendix 4). The assessment notes that the area surrounding the site contains wildlife species that may pose a hazard to aircraft on the flight path south of Canberra Airport.</p> <p>The assessment has found that construction of the school could result in the temporary attraction of small numbers of hazardous species. Birds may be attracted to disturbed soil, temporary ponding, workers' food waste and new seeds/shoots. The assessment also notes that operation of the school also has minor potential to attract hazardous species.</p> <p>The assessment makes a number of recommendations to reduce strike risk including:</p> <p><u>Construction phase:</u></p> <ul style="list-style-type: none"> • Minimise erosion through the use of silt barriers. • Use secure bins for food waste. • Using direct seeding rather than spray-grassing. • Reassess building features that may allow nesting/roosting of feral pigeons and modify them to reduce this. <p><u>Operational phase:</u></p> <ul style="list-style-type: none"> • Limit the use of trees which attract hazardous bird species and flying foxes. • Net animal-attracting fruiting trees in the productive garden. • Use secure bins for food waste.
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Key issue	Response
	<ul style="list-style-type: none"> Discourage feeding of wildlife as part of the school's operational management plan. <p>In response to the recommended construction measures, we note that:</p> <ul style="list-style-type: none"> Sediment and erosion control and securing of food waste will be included within the project's construction environmental management plan (CEMP) to be prepared as a condition of consent. The use of direct seeding has been specified in the updated planting schedule. The architect has reviewed Aviation Wildlife Hazard Assessment and notes the following: <ul style="list-style-type: none"> Perching surfaces have been reduced as part of the refined façade design. Covered workshop areas will be reviewed to exclude bird access where practical during detailed design. Covered walkways and spaces between buildings have lined soffits limiting options for wildlife to perch. The design documents specify the use of bird-repellent spikes for areas which cannot be addressed through design. A general review of the design will be conducted during the detailed design phase to identify further opportunities to mitigate bird perching options. <p>We consider that the architect's response sufficiently addresses the recommendations regarding design measures, with no further review or design changes required prior to determination of the application.</p> <p>In response to the recommended operational measures, we note that:</p> <ul style="list-style-type: none"> The landscape plan has been updated (Appendix 2) to reduce the type of trees that attract hazardous bird species and flying foxes. Specifically, <i>Juglans nigra</i>, <i>Pistacia chinensis</i> and <i>Quercus palustris</i> have been removed from the planting schedule. A note has been added to the planting schedule that netting is to be utilised for fruit trees. The rubbish bin product specified in the landscape plans has been amended to be a covered rubbish bin. The recommendation regarding feeding of wildlife can be implemented by school staff during operation of the school.

Key issue	Response
5. Water quality	
As per the EPA advice, further information must be provided to demonstrate the capacity, sizing, design rain event, catchment and management of the sediment for the proposed temporary sediment basin.	<p>A conceptual sediment and erosion control plan in accordance with the "Blue Book", providing preliminary details of the sediment control measures, has been prepared and is detailed on M+G drawings JHS-CE-2005 & 2006 (Appendix 3).</p> <p>A detailed sediment and erosion control plan containing detailed design of the sediment control, erosion control and site stabilisation practices, including staging of the earthworks and these practices, will be prepared by the earthworks contractor and subsequently reviewed and approved by Hindmarsh/M+G, the head contractor/civil engineer, prior to civil works commencing.</p>

4.2 Response to Council

Council provided a detailed submission dated 9 December 2021. Table 4 provides a brief summary of the key issues raised in Council's submission and a response to Council's recommendations.

Table 4. Response to Council

Summary of comment + recommendation	Response
<p>1. Permissibility</p> <p>Council raises no objections or notable issues regarding permissibility.</p> <p><i>Recommendations:</i></p> <p>Nil</p>	NA
<p>2. Utilities</p> <p>Council raises no objections or notable issues regarding utilities.</p> <p><i>Recommendations:</i></p> <p>That the consent authority impose conditions requiring:</p> <ul style="list-style-type: none"> 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. 	<p>As discussed in M+G's letter at Appendix 3, the proposed stormwater system is designed in accordance with Council's D5 Stormwater Drainage Design specification for both the 20% AEP and 1% AEP storm events using "Drains" computer modelling software.</p> <p>Water quality targets are in accordance with Council's D7 Erosion Control and Stormwater Management Design specification.</p> <p>A sediment and erosion control plan has been prepared in accordance with the "Blue Book" as required by Council specification D7.</p> <p>Water quality devices have been incorporated into the stormwater disposal system using WSUD principles. "MUSIC" computer modelling software has been used to model these devices.</p> <p>An OSD tank has been incorporated into the stormwater disposal system to accept stormwater from impermeable areas to reduce</p>

Summary of comment + recommendation	Response
	<p>the peak flows as required for this development.</p> <p>All connections and alterations to Council's utility services will be inspected by Council staff prior to backfilling.</p>
<p>3. Erosion and Sediment Control</p> <p>Council raises no objections or notable issues regarding erosion and sediment control.</p> <p><i>Recommendation:</i></p> <p>That the consent authority impose conditions requiring the preparation, implementation and maintenance of an erosion and sedimentation plan throughout the construction of the development.</p>	<p>The proponent agrees to DPE's standard condition regarding erosion and sediment control.</p>
<p>4. Traffic and Roads</p> <p>Council considers that the Transport Assessment contains insufficient analysis of the development's impacts on on-street parking. Council also raises concern regarding availability of parking during school zone time for parents who may need to visit the school.</p> <p><i>Recommendations:</i></p> <ul style="list-style-type: none"> • 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) 	<p>The carpark has been extended to provide for an additional 10 spaces, resulting in a total of 44 off-street spaces as per Council's request.</p> <p>GHD's letter contains detailed discussion on how on-street parking will be catered for. In summary:</p> <ul style="list-style-type: none"> • The 7 kiss-and-drop bays will be available for school visitors outside the kiss-and-drop hours. The bays will be signposted accordingly. • If visitors need to visit the school during kiss-and-ride hours, they would need to seek alternative parking on the local road network to the south and east of the school. Active transport paths support connectivity from the south. • Student parking is discouraged in line with the School Transport Plan vision. However, those students who choose to drive may park on the surrounding local road network. Based on the analysis undertaken, this is expected to have very little impact on the local road network.
<p>5. Student Pick-Up and Drop-Off</p> <p>Council expresses concern that the 7 designated spaces for pick-up and drop-off are insufficient.</p> <p><i>Recommendation:</i></p> <p>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)</p>	<p>Further analysis prepared by GHD confirms that the 7 kiss-and-drop bays are sufficient from capacity and queuing perspectives. Refer to GHD's letter at Appendix 5 for detail.</p>
<p>6. Other Comments – School Transport Plan</p> <p>Council raises concern regarding the governance framework for the School Transport</p>	<p>Council's concerns are noted and will be considered during preparation of the STP following SSDA determination.</p>

Summary of comment + recommendation	Response
<p>Plan (STP). In particular, Council questions the skills and qualifications of the internal working group established to identify traffic issues and mitigation measures. Council also questions how ongoing responsibilities generated around the STP will be managed given the Travel Coordinator role is funded for 1 year.</p> <p><i>Recommendation:</i></p> <p>Nil</p>	
<p>7. Public Transport</p> <p>Council notes that, 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.</p> <p><i>Recommendation:</i></p> <p>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.</p>	<p>DoE accepts the recommended condition.</p>
<p>8. Crossings and Pedestrian Movements</p> <p>Council considers that 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. Council also considers that the Transport Assessment contains insufficient information on how pedestrian movement from the western side of Envirova Drive will be discouraged.</p> <p><i>Recommendations:</i></p> <ul style="list-style-type: none"> • 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 Envirova Drive can be discouraged. (Objection) 	<p>GHD has revisited the potential for a mid-block crossing on the northern road and has found that the No Stopping signage required for the crossing is inconsistent with the road's geometry or the kiss-and-drop operations. Therefore, the mid-block crossing is not considered feasible, and the crossing will remain at the intersection of the stub road and Envirova Drive as originally proposed. Refer to GHD's letter at Appendix 5 for further discussion.</p> <p>Regarding pedestrian movements from the western side of Envirova Drive, No Stopping signage and fencing will be installed to discourage such movement. Refer to GHD's letter at Appendix 5 for further detail.</p>
<p>9. Waste Collection and Deliveries</p> <p>Council raises no objections or notable issues regarding waste collection and deliveries.</p> <p><i>Recommendations:</i></p> <ul style="list-style-type: none"> • 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 	<p>The submitted Operational Waste Management Plan (Appendix 20 of the EIS) specifies that the waste collection company will determine the collection hours based on school location and logistical access, with the hours to be scheduled outside of school peak hours (i.e., outside of 8am to 9:30am and 2:30pm to 4pm). The proponent agrees to comply with these hours. Further restrictions on the early morning and evening hours are considered unnecessary, as the submitted Noise and Vibration Assessment (Appendix 11 of EIS) notes that the waste removal truck</p>

Summary of comment + recommendation	Response
(excluding waste servicing) to be scheduled outside the periods 8:00am to 9:30am and 2:30pm to 4:00pm.	would park approximately 200m from the nearest residential dwelling and confirms that this separation distance would "adequately address noise impact from waste removal operations", with no restriction on hours required. Regarding deliveries, the proponent agrees to comply with the time restrictions recommended by Council. This recommendation is consistent with section 2.3.1.5 of the submitted Transport Assessment, which states that no deliveries will be scheduled between 8am to 9:30am or between 2:30pm and 4pm.
10. Entrance and Access Council raises no objections or notable issues regarding entrance and access. <i>Recommendation:</i> That the consent authority be requested to impose a condition requiring the carparking area to be designed in accordance with the appropriate Australian Standard.	The proponent intends to design the carparking in accordance with the appropriate Australian Standard and therefore agrees to any condition requiring this.
11. Flooding Council raises no objections or notable issues regarding flooding. <i>Recommendations:</i> Nil	Noted.
12. Developer Contributions Council notes that South Jerrabomberra Local Infrastructure Contributions Plan 2018 does not apply to government schools. Council further notes that no Section 64 contributions are applicable. <i>Recommendations:</i> Nil	Noted.
13. Bushfire Assessment Council raises no objections or notable issues regarding bushfire. <i>Recommendations:</i> Nil	Noted.
14. Fire Services/Disability Access Council raises no objections or notable issues regarding fire services/disability access. <i>Recommendations:</i> Nil	Noted.
15. Section 68 Local Government Approvals	DoE accepts the recommended conditions.

Summary of comment + recommendation	Response
<p>Council raises no objections or notable issues regarding Section 68 Local Government Approvals.</p> <p><i>Recommendations:</i></p> <ul style="list-style-type: none"> 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. 	
<p>16. Building Design and Amenity</p> <p>Council raises no objections or notable issues regarding building design and amenity.</p> <p><i>Recommendations:</i></p> <p>Nil</p>	Noted.
<p>17. Heritage</p> <p>Council raises no objections or notable issues regarding heritage.</p> <p><i>Recommendations:</i></p> <p>Nil</p>	Noted.
<p>18. Contamination</p> <p>Council raises no objections or notable issues regarding contamination.</p> <p><i>Recommendations:</i></p> <p>Nil</p>	Noted.
<p>19. Other Matters</p> <p>Council raises no objections or notable issues regarding biodiversity, crime prevention, waste management, ecologically sustainable development, soil and water or noise.</p> <p><i>Recommendations:</i></p> <p>Nil</p>	Noted.
<p>20. Environmental Health Matters</p> <p>Council notes that the food preparation areas should be constructed in accordance with the relevant NSW Food Safety Standards. Council also expresses concern that there is no visual barrier into the student toilet facilities on levels 1, 2 and 3, and that there is no urinal in the boys toilets.</p> <p><i>Recommendation:</i></p>	<p>It should be noted that the proposed canteen has been designed to comply with the EFSG requirement DG15.</p> <p>The minimum functions undertaken within a school canteen, will be as follows:</p> <ul style="list-style-type: none"> The canteen will be preparing sandwiches and rolls for distribution as well as distributing pre-prepared food such as pies and sausage rolls.

Summary of comment + recommendation	Response
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.	<ul style="list-style-type: none"> • Heating of pre-prepared foods will be undertaken in equipment such as pie ovens and /or microwave ovens. • In general, no cooking of foodstuffs will be undertaken. • Boiling water will be used for preparing hot beverages. • As no cooking is anticipated, washing up will usually be able to be undertaken within a double sink. <p>Due to the functions noted above, a school canteen is generally not considered to be a "food preparation area" and is more akin to a "servery" whose use is described within the regulations for food premises.</p> <p>Toilets have been designed in response to current community expectations as gender neutral, self-contained cubicles, compliant with the NCC under Clause F2.6(a)(iii). The cubicles are fully enclosed and maintain privacy as individual units. To address child safety imperatives, no additional visual barriers are provided.</p>

4.3 Response to agency advice

4.3.1 TfNSW

Table 5 provides responses to the comments by TfNSW in its letter dated 14 December 2021.

Table 5. Response to TfNSW

Comments	Response
<p><u>1. School bus access:</u></p> <p>Noting the residential development that is occurring and is planned to the south of the proposed school site (including the area south of the defined school catchment) and how Envirova Drive has been constructed (i.e. central raised median), it is unclear to TfNSW how a bus coming from the south along Envirova Drive will be able to access the bus drop off area for the school. TfNSW notes that this issue has been raised previously in the Transport Working Group meetings. Additional details are required which should include details on discussions with the TfNSW Rural and Regional Contracts team concerning the above.</p>	<p>The current geometry of the bus zone for the high school on the eastern side of Envirova Drive does not enable right turns in for buses coming from the south.</p> <p>Based on the current infrastructure, buses from the south would need to undertake a 2.7km detour via the Jerrabomberra Circle. Once the internal road network within the South Poplar precinct is connected to Envirova Drive, buses approaching from the south could utilise the proposed access intersection to access the internal road network and turn around to head south on Envirova Drive towards the bus zone.</p> <p>Further discussion between TfNSW, Council and DoE will be undertaken as the project progresses to determine the appropriate access strategy.</p> <p>Refer to GHD's letter at Appendix 5 for further detail.</p>

Comments	Response
<p><u>2. School drop off on the western side of Environa Drive</u></p> <p>Additional details should be provided on what measures will be implemented to either prevent school students from being drop-off on the western side of Environa Drive including details on measures that will be implemented to prevent students crossing Environa Drive from west to east in the vicinity of the school or alternatively what facilities will be provided to enable the above to occur.</p>	<p>No Stopping signage and fencing will be installed to discourage pedestrian movement from the western side of Environa Drive. Refer to GHD's letter at Appendix 5 for further detail.</p>
<p><u>3. School catchment:</u></p> <p>The school catchment as defined in the New High School in Jerrabomberra Traffic Assessment (prepared by GHD, Rev 11 and dated 8 November 2021 – refer to Figure 1.4) does not appear to include the Tralee residential development that will contain 1,500 dwellings and that is located at its closest point approximately 2.9km by road from the school site (i.e. outside the defined walking and cycling catchments and within the free bus pass area). Estate 1 which contains 318 residential lots and 10 super lots (DA395- 2017) has been constructed and will be occupied by the time the school is operational.</p>	<p>The preliminary school catchment for the new high school was sourced from the latest catchment information available at the time of assessment.</p> <p>The Transport Assessment submitted with the EIS accounted for the vehicle activity associated with the wider growth of Jerrabomberra, including 1,500 additional lots. Council has reviewed the modelling and indicated that it has no further comments.</p>
<p><u>4. Car parking:</u></p> <p>Noting that some of the students attending the school will be able to drive, it is unclear to TfNSW what parking provisions have been made for students who do drive noting the car park that is provided will be controlled by a gate with a reader/intercom and will be utilised by operational staff and visitors to the school.</p>	<p>Students will not be permitted to park onsite, and student driving is discouraged in accordance with the intent of the School Transport Plan. A small number of students may choose to park on the local road network to the south of the school. Refer to GHD's letter at Appendix 5 for further detail.</p>

4.3.2 BCD

Table 6 provides responses to the comments by the BCD in its letter dated 26 November 2021.

Table 6. Response to BCD

Comments	Response
<p>We have reviewed the BDAR and note that the development footprint directly aligns with the previous subdivision development consent for the site. The BDAR concluded that the proposed clearing would generate an offset requirement of nine species credits for the golden sun moth, and that this credit liability has already been paid as part of the subdivision development consent.</p>	<p>Noted.</p>
<p>BC Act Box-Gum Woodland</p> <p>The BDAR states that 'PCT1334 Zone 5 lacks a</p>	<p>Noted. See below responses.</p>

Comments	Response
<p>native overstorey and has a ground storey that is highly modified and dominated by perennial exotic grasses and herbaceous weeds. As such, PCT1334 Zone 5 does not support vegetation which meets the criteria for this TEC under the BC Act."</p> <p>Whilst it might be the case that Zone 5 does not meet the definition of box-gum woodland, it does not mean that it is not native vegetation. If there was no native vegetation, zone 5 would need to be re-classified as a different PCT. See advice below on further actions required.</p>	
<p>Vegetation zone assessment</p> <p>As zone 5 of PCT 1334 contains native vegetation as defined in the Local Land Services Act 2013, a vegetation integrity score (VIS) must be provided for this zone in accordance with 4.4 of BAM 2020. Native vegetation is not defined by a percentage, only presence. If the VIS is less than 15, then no further assessment is required.</p> <p>The BDAR will need to be updated to reflect the VIS of zone 5 of PCT, including, but not limited to the following:</p> <ul style="list-style-type: none"> • The credit calculation for ecosystem credits – the 'Area Impact' is incorrect and should include the 1.79ha of Zone 5 of PCT1334, in addition to the 1.46ha of Zone 4 of PCT 1334. • Figures showing native vegetation will need to be updated as Zone 5 PCT 1334 contains native vegetation, regardless of whether it meets the definition of box-gum woodland, or percentage of native vegetation. <p>BCD expect that the BDAR will be updated to reflect the issues raised above and to align with BAM 2020.</p>	<p>The updated BDAR (Appendix 6) applies a VIS to Zone 5 and provides an updated credit calculation based on this. Associated figures have also been updated.</p> <p>The updated assessment has been found that the VIS for Zone 5 is 1.3, and therefore no offsetting is required for impacts to this zone.</p>
<p>Serious and Irreversible Impacts Assessment</p> <p>The SAI assessments for box-gum woodland and golden sun moth will need to be updated to reflect the requirements of BAM 2020, noting that there are no longer thresholds specified.</p> <p>Sections e) and f) of 3.4.2.1 SAI additional information, provide an estimate figure of 310ha of box-gum woodland reserve that is formally reserved in the IBRA subregion. However, the data used to estimate extent is too old to rely upon and should be updated. This data should take into account the local developments that have resulted in clearing of box-gum woodland, and the cumulative impacts this has had on its extent.</p>	<p>The updated BDAR (Appendix 6) includes updated SAI assessments reflecting the requirements of BAM 2020. Section 3.4.2.1 has also been updated to take into account clearing by local developments. The overall findings of the SAIs have not changed compared to the original BDAR.</p>

Comments	Response
<p>BAM Plot location</p> <p>The BDAR states that there is not a BAM plot on the development footprint, however Figure 9 BAM Vegetation Mapping and Survey shows a BAM plot numbered 1334.4.3. The BDAR should be updated to reflect this.</p>	<p>The updated BDAR (Appendix 6) clarifies that the majority of the BAM plots are located outside the development footprint, with the exception being plot 1334.4.3.</p>

4.3.3 Heritage NSW – Aboriginal Cultural Heritage

Heritage NSW – Aboriginal Cultural Heritage provided electronic advice dated 21 November 2021, noting that they concur with the assessment provided in the ACHAR and have no additional comments or recommendations. As such, it is considered that no further action or information regarding Aboriginal culture heritage is required.

4.3.4 EPA

Table 7 provides responses to the comments by the EPA in its submission letter dated 6 December 2021.

Table 7. Response to EPA

Comments	Response
Water Quality	
<p><u>Construction</u></p> <p>The EPA recommends consideration of the receiving environment and the relevant WQOs in relation to the proposal and how any discharge from the site will meet or improve the environmental values of the receiving waters.</p>	<p>As discussed in M+G's letter at Appendix 3, to ensure that the receiving waters (Jerrabomberra Creek) are not polluted or significantly affected in terms of water quality during construction works for the proposed development, all civil works are to be undertaken in accordance with NSW Government Requirements "Managing Urban Stormwater: Soils and Construction", referred to as the "Blue Book".</p> <p>The stormwater drainage system for the proposed development has been designed to incorporate Water Sensitive Urban Design (WSUD) elements, bioretention swale/basin and stormwater treatment system in the On-Site Detention (OSD) tank. This will reduce the pollution load of the receiving waters to acceptable water quality levels. MUSIC modelling of the pollutant loads has been undertaken to design these WSUD elements.</p>
<p><u>Construction</u></p> <p>The EPA recommends further information to demonstrate the capacity, sizing, design rain event, catchment and management of the sediment be provided.</p> <p>The EPA recommends that a detailed Sediment and Erosion Control Management Plan is developed for the proposed construction prior to the commencement of works.</p>	<p>As discussed in M+G's letter at Appendix 3, a conceptual sediment and erosion control plan, in accordance with the "Blue Book", has been prepared and is detailed on M+G drawings JHS-CE-2005 & 2006.</p> <p>A detailed sediment and erosion control plan containing detailed design of the sediment control, erosion control and site stabilisation practices, including staging of the earthworks and these practices, will be prepared by the earthwork contractor and reviewed and approved by Hindmarsh/M+G, the head contractor/civil engineer, prior to civil works commencing.</p> <p>This plan will include monitoring provisions that will allow the SWMP to be changed/modified during the works to ensure that the required water quality objectives are achieved during the construction stage.</p>
<p><u>Pre-rainfall Procedures</u></p> <p>The EPA recommends these additional measures are captured as formal procedures and all relevant team members are aware of the procedures.</p>	<p>As discussed in the M+G letter at Appendix 3, the SWMP requires, at times of wet weather, windy events and extended dry periods, that appropriate additional measures are taken to ensure that water quality objectives of the SWMP are achieved.</p>

Comments	Response
	<p>The SWMP will reference that prior to these significant high risk events, which may lead to soil erosion across soil stockpiles and steep disturbed slopes, such areas will be covered with geotechnical material to reduce potential soil erosion.</p> <p>Sediment traps and check dams will be inspected and maintained as require prior to storm events.</p> <p>All erosion and sediment control measures will be required to be regularly inspected, particularly prior to and following wet weather events, repaired and/or maintained to ensure functionality across the system is not compromised.</p>
<p><u>Use of Flocculant</u></p> <p>Should flocculants be used to treat the water captured onsite, information on the product and details on the proposed chemicals to be used and potential impacts must be provided to the EPA for consideration and assessment. Such details should include, but need not be limited to:</p> <ul style="list-style-type: none"> - The dose concentration(s) of the proposed flocculant - A characterisation of the expected quality in terms of all pollutants present that pose a risk of non-trivial harm to the environment should they enter the receiving water - An assessment of the potential impact of discharges on the environmental values of the receiving waterway with reference to the Australian and New Zealand Guideline for Fresh and Marine Water Quality and the NSW Water Quality objectives - The degradation rate of the flocculant and the potential for accumulation in bed sediment of the receiving waterways. 	<p>To ensure that the discharging waters from the site meet water quality requirements in terms of suspended solids, sediment basins will be detailed in the SWMP. These sediment basins will be sized so that the use of flocculants will not be required, or their use minimised.</p> <p>Should flocculants be used to treat the water captured onsite, information on the product and details on the proposed chemicals to be used and potential impacts will be provided to the EPA for consideration and assessment.</p>
Noise and Vibration	
<p><u>Operation</u></p> <p>No recommendations provided.</p>	NA
<p><u>Out of Hours Use of School Facilities</u></p> <p>The EPA recommends that the external school facilities not be made available for community use:</p> <ul style="list-style-type: none"> - During weekday mornings, - Later than 6:00pm on weeknights - Other than between the hours of 8:00am and 6:00pm on Saturdays, and 	<p>As a matter of policy, the proponent encourages out of hours community use of school facilities and considers the EPA's recommendation to be unnecessary and onerous.</p> <p>The proponent accepts DPE's standard condition regarding out of hours events, which requires an Out of Hours Event Management Plan to be prepared and implemented for events involving 100 or more people. The condition states that the plan</p>

Comments	Response
<p>- At any time during Sundays and public holidays.</p>	<p>must be prepared in consultation with Council, and it must include, inter-alia:</p> <ul style="list-style-type: none"> • Measures to encourage non-vehicular travel. • Measures to minimise localised traffic and parking impacts. • Measures to minimise noise impacts, including preparation of an acoustic management plan. • Details of the use of the hall, where applicable, restricting use before 8am and after 10pm. <p>The proponent considers the requirements of the standard condition to be sufficient for minimising noise impacts for out of hours events.</p> <p>It is noted that DPE recently applied this standard condition to consents for new primary schools in Murrumbateman ((SSD-11233241) and Googong (SSD-10326042).</p>
<p><u>Mechanical Plant and Equipment</u></p> <p>The EPA recommends that the proponent ensure that mechanical plant and equipment installed does not generate noise that:</p> <ul style="list-style-type: none"> - Exceeds 5 dBA above the rating background noise level (day, evening and night) measured at the boundaries of the proposal site, and - Exhibits tonal or other annoying characteristics. 	<p>The proposed mechanical plant design for the main noise emitting items (i.e., air conditioning outdoor units) has been assessed. The assessment shows that the predicted noise levels will comply with the relevant criteria. The remaining plant is minor in nature and can be readily treated to comply. Refer to Acoustic Logic's letter at Appendix 8 for further detail.</p>
<p><u>Waste Removal</u></p> <p>The EPA recommends waste collection and removal services not be undertaken outside the hours of 7:30am and 6:00pm Monday to Friday.</p>	<p>The submitted Operational Waste Management Plan (Appendix 20 of the EIS) specifies that the waste collection company will determine the collection hours based on school location and logistical access, with the hours to be scheduled outside of school peak hours (i.e., outside of 8am to 9:30am and 2:30pm to 4pm). The proponent agrees to comply with these hours. Further restrictions on the early morning and evening hours are considered unnecessary, as the submitted Noise and Vibration Assessment (Appendix 11 of EIS) notes that the waste removal truck would park approximately 200m from the nearest residential dwelling and confirms that this separation distance would "adequately address noise impact from waste removal operations", with no restriction on hours required.</p> <p>The proponent will also comply with DPE's standard condition regarding operational waste, which require preparation of an Operational Waste Management Plan which:</p>

Comments	Response
	<ul style="list-style-type: none"> Details the type and quantity of waste to be generated. Describes the handling storage and disposal of all waste streams generated on site. Details the materials to be reused or recycled. Includes the management and mitigation measures included in the waste management plan submitted with the EIS.
<p><u>Public Address and School Bell System</u></p> <p>The EPA recommends that the school public address and bell system be designed, installed and operated to ensure that the system does not interfere unreasonably with the comfort and repose of nearby sensitive receivers.</p>	<p>Noted. The public address and bell system will be designed, installed and operated in accordance with the recommendations in the Noise and Vibration Assessment (Appendix 11 of the EIS). Details on the system are provided in NDY's letter at Appendix 9.</p>
<p><u>Construction</u></p> <p>The EPA recommends that a Noise Management Plan be developed to minimise noise impacts on sensitive receivers prior to commencing construction works and implemented throughout the construction phase of the project.</p> <p>The proponent should implement all feasible and reasonable noise mitigation and management measures to minimise noise impacts for sensitive receivers during construction.</p>	<p>A Construction Noise and Vibration Management Sub-Plan (part of the broader Construction Environmental Management plan) will be prepared in accordance with DPE's standard conditions.</p>
<p><u>Hours of Operation During Construction</u></p> <p>The EPA recommends that the proponent provide further information to justify the approval of construction outside of standard hours identified in the Interim Construction Noise Guidelines. The EPA considers it appropriate to capture the standard hours of construction in the project approval.</p>	<p>The proponent requests that DPE allow for additional construction hours subject to noise restrictions. Specifically, the proponent requests that DPE allow for construction work between 6pm and 7pm Mondays to Fridays inclusive, and between 1pm and 4pm Saturdays, <i>provided noise levels do not exceed the existing background noise level plus 5dB</i>. This is consistent with the recently approved SSD-11233241.</p>

4.3.5 RFS

Table 8 provides responses to the comments received from the RFS in its letter dated 3 December 2021.

Table 8. Response to RFS

Comments	Response
<p>1. The bush fire protection measures listed in part 3 of the Bush Fire Assessment report by Ecological dated 17 September 2021 ref: 21CAN_17658 shall be included as conditions of the development consent.</p>	<p>The proponent agrees to implement the bush fire protection measures listed in Ecological's report.</p>

4.4 Response to public submissions

Table 9 provides responses to the 3 public submissions.

Table 9. Response to public submissions

Comments	Response
<p><i>K. Gervnik (support)</i></p> <p>Well Planned, good practical location.</p>	<p>Noted.</p>
<p><i>K. Hawkins (comment)</i></p> <p>I am hoping that the supported learning area has an adjacent and private outdoor play area. Often children with special needs require a play area that is quiet, safe and segregated from the mainstream play or activity areas. Children with sensory needs can become quite overwhelmed with many people outside, playing and talking and need a play area they can attend away from the main areas. Play equipment suitable, sitting places under trees or areas to just pace around where stimming behaviours can be more private, really assist our children. I hope this can be accommodated in the new beautiful design for inclusive education. It's wonderful to see special needs and supported learning areas included in this new school. I hope my son with autism spectrum disorder can attend in 2023.</p>	<p>The support learning area features an adjacent and private outdoor play area.</p> <p>DoE is committed to strengthening inclusive practice. This includes making sure education environments and physical structures support all students to access and fully participate in their learning.</p> <p>DoE has released a new Inclusive Education Policy for Students with disability and a Restrictive Practices Framework and policy. These policies will guide inclusive practice for students with disability and the use of restrictive practices in our schools, including the use of environmental restraints such as internal fences, to make sure they are student-centred and align with the decision-making principles in the Framework.</p> <p>The Restrictive Practices Framework recognises that restrictive practices may still be necessary but should only be used as a last resort and the least restrictive approach to protecting the safety of children, young people, and/or staff in our schools and NSW government preschools.</p> <p>DoE will continue to work with parents and carers and disability and education experts to personalise support so that every student is engaged and learning to their fullest capability.</p>
<p><i>Anonymous (support)</i></p> <p>I strongly support the project and submit the following comments for your consideration and action.</p> <p>The following comments are provided in an effort to help improve the long-term outcome:</p> <p>SIZE – JHS is being designed for approx. 500 students. This will prove to be grossly inadequate for the future needs of the community. It is acknowledged that 'some' core infrastructure has been sized for possible expansion. Acknowledging this, the school will require a future master plan for how it will support a student population past the initial Stage 1 build. A public master plan should be prepared now to include identification of buildings required for a</p>	<p><u>Size</u></p> <p>The size of the proposed school is based on DoE's demand projections. The teaching spaces have been designed to accommodate expected demand, whilst the core facilities have been future proofed, sized to allow for future expansion if required.</p> <p>Providing a masterplan for future expansion is outside the scope of the current application.</p> <p>DoE will regularly review demand projections and update the community as required regarding any plans for expansion.</p> <p><u>Parking</u></p> <p>The carpark has been expanded to provide for a total of 44 spaces.</p>

Comments	Response
<p>future Stage 2, up to approx. 850 students, and additionally, Stage 3, for up to 1,000 plus students.</p> <p>RECOMMENDATION: As part of this initial plan, it is requested that a school building master plan for future growth stages be prepared and made available to the local community.</p> <p>PARKING – It is noted that only 34 car park spaces will be provided (teachers only, although over 44 school staff are to be employed in Stage 1. This will be grossly inadequate.</p> <p>It is also noted that off-street parking is not available. On-street parking is also extremely limited or non-existent. It is also noting regular public transport is not available in the area. JHS clients will also require parking when a school event is scheduled?</p> <p>RECOMMENDATION: Additional parking spaces to be identified and provided for staff and clients to access the school in a safe manner.</p> <p>PICK-UP /DROP-OFF AREA – Student pick-up and drop-off area appears to be very limited (7 car spaces), this is unrealistic for this school.</p> <p>RECOMMENDATION: It is requested that additional space be identified for student pick-up and drop-off.</p> <p>P.S: Can you please provide me with additional information on specifically what core infrastructure has been sized for future expansion and to what capacity,</p> <p>Thank you for your attention and consideration.</p>	<p><u>Pick-up/drop-off</u></p> <p>GHD has reviewed the quantity of the kiss-and-drop bays and has found the proposed 7 bays to be sufficient from capacity and queuing perspectives. Refer to GHD's detailed discussion in its letter at Appendix 8.</p> <p><u>Core infrastructure</u></p> <p>As noted above, the teaching spaces have been designed to accommodate expected demand, whilst the core facilities have been future proofed, sized to allow for future expansion if required.</p>

5 Updated mitigation measures

The mitigation measures set out at Section 9 of the EIS generally remain relevant, with only the measures related to transport and accessibility requiring updates. Table 10 outlines the updated transport and accessibility measures.

Table 10. Updated mitigation measures

Item	Potential impact	Mitigation measures
Transport and accessibility	Construction: Heavy and light construction vehicles will access the site throughout the construction phase. The construction workforce will generate approximately 100 light vehicles per day.	A detailed construction traffic and pedestrian management plan is to be prepared and implemented. Workers will be required to park within the site.
	Operation: The school will generate approximately 205 vehicle trips in the peak hours (including students and staff). SIDRA modelling shows that the school will have only minor	A School Transport Plan is to be implemented.

Item	Potential impact	Mitigation measures
	impacts on the performance of the surrounding key intersections. Some of the intersections will operate at LoS F in the future, but this is generally attributable to background growth rather than the school.	DoE will advocate to Council for upgrades to the surrounding active transport network.
	Operation: Drop-off from the western side of Environa Drive could cause significant safety issues.	'No Stopping' signage and fencing are to be installed to discourage drop-off from the western side of Environa Drive, as recommended in GHD's letter at Appendix 5 of the Submissions Report.

Issues raised during exhibition which are related to non-transport areas of impact of have been addressed through changes to the design or provision of additional information.

6 Conclusion

This Submissions Report has addressed the submissions received during public exhibition of SSD-24461956 and the advice received from government agencies. The proposal has been refined and additional information has been provided to address the issues raised.

The proposal as refined will result in high-quality development that achieves the original aims of the proposal while resulting in no unacceptable environmental impacts.

Based on the supporting material provided in this Submissions Report in addition to the material provided in the original EIS, DPE has now been provided with sufficient information to progress the assessment of SSD-24461956. We request that DPE complete the assessment of the application and proceed to determination.

