

3 January 2023

Ms Teresa Gizzi
Principal Planner, Social and Infrastructure Assessment
Department of Planning and Environment
Teresa.gizzi@planning.nsw.gov.au

Dear Ms Gizzi,

RE: State Significant Development – SSD-41306367 - Proposed New Gregory Hills Public School - 28 Wallarah Circuit, Gregory Hills

Our Reference - SS/2022/2/1

Thank you for notifying Camden Council in relation to the above matter regarding a proposed new primary school for 1,012 students and 60 staff. Council staff have reviewed the documentation accompanying the application and provides the following comments for your consideration:

Flooding/Stormwater Management

Council's Engineers have reviewed the documentation accompanying the application, including the Flood Study prepared by Robert Bird Group, dated 27 October 2022, and make the following comments:

- A minor area within the site has been identified as being impacted by 1% AEP flood event. This area is limited to the north-western corner of the site with shallow depth less than 0.25 m and does not impact on the footprint of any proposed buildings. The flood planning level of the site is RL115.1m, the lowest ground floor RL (hall) is RL115.7m, the remainder have ground floor RL of 116.1m, which is consistent with the 1% AEP level plus 500mm freeboard requirement.
- In the Probable Maximum Flood (PMF) flood event, the site is not largely impacted by flooding except a strip of flow with shallow depth at the north-western border and at the south-western corner of the site. These areas are designed for open space and would include existing and proposed trees.
- There is a chain of detention basins bordering the site from the south-western border. The depth of the water in these basins is up to 3m in rarer events.
- Flood modelling was undertaken which identified post development flows only affected the flood by ± 1 mm, compared to pre-development flow in both the 1% AEP and PMF events.

- Sections of the surrounding road networks will be cut off in the PMF event. However, the critical duration for the PMF of is up to 1 hour.

In light of the above commentary, it is recommended that in order to help ensure the safety of students, teachers, parents, carers and other members of the school community, an Emergency Response Plan (ERP) be prepared and include safety signs at the western part of the site near the detention basins and near the flow path at the southern border of the site, and consider the access to school in the extreme rare event such as the PMF event.

This is a matter that can be addressed by a condition on any development consent issued.

Traffic and Car Parking

Council's technical experts have reviewed the EIS documentation and make the following comments in relation to traffic and car parking:

- It is noted that the proposed car parking area provides parking for 60 vehicles with three (3) bays within the internal pick up drop off area for the support learning stream. Seventeen (17) short stay on-street spaces are also proposed with the road widening on Long Reef Circuit. Council's DCP requires a total of 71 spaces to be provided based proposed staff and student numbers and as such, having regard to the available on-street provision, sufficient car parking is provided to meet the requirements of the DCP.
- The three (3) internal bays noted above for the support stream drop-off shall be signposted and line marked as disabled parking in accordance with AS2890.6-2009 specifications.
- There are no changes to the on-street parking restrictions as proposed as part of the temporary school approval recently issued by Council (DA/2022/742/1). Any changes to these parking restrictions would require the concurrence of the Local Traffic Committee, including proposed signage and line marking plans. The indented bays along Long Reef shall remain as short stay parking as indicated in the Traffic Report.
- Pedestrian refuge islands are proposed to be constructed by Council along Kavanagh Street. An installation date for these traffic facilities has not yet been confirmed. The applicant may seek to modify this proposed treatment to suit the needs of the school community.
- It is recommended that indented parking be provided along the eastern side of Long Reef Circuit (along the electricity easement) rather than maintain the timed No Stopping restrictions. Indented bays would provide additional parking for parents and maintain residential amenity for occupants opposite that would not be able to utilise the eastern side of the road to park vehicles.

- A signalised crossing along Gregory Hills Drive should be provided to service the expected student catchment on the northern side of Gregory Hills Drive, subject to the advice of Transport for NSW.
- Waste collection for the proposed site shall be undertaken outside of peak pick-up and drop-off periods. This issue can be addressed through a suitable condition on any development consent issued.

Building Code of Australia Considerations

The BCA compliance report accompanying the application states that the assessment of the design documentation has revealed that a number of areas required to be assessed against the relevant Performance Requirements of the BCA in accordance with Clause 25 of the Building and Development Certifiers Regulation 2020. BCA compliance can be achieved for the development by way of introducing performance solutions as per the BCA requirements.

It is noted that the DDA compliance report discusses compliance with Section D of the BCA Volume 1, and AS 1428. This report states that the development is capable to comply. However, the DDA and BCA Assessment Report does not discuss compliance with number of facilities for the students and occupants. It is recommended that compliance details in accordance with Section F of the BCA Volume 1 be provided for Development Application approval stage and Crown Works Certificate assessment.

Environmental (Public Health) Considerations

As the proposed development includes a canteen and outside school hours care service (OSHC), these facilities fall under the category of food for sale and the requirements of the Food Act. As such, the fit-out of these spaces will be required to meet the following standards:

1. Food Act 2003
2. Food Regulation 2015
3. Food Standards Code
4. AS4674: Design, construction and fit out of food premises

These are matters can be addressed via conditions on any development consent issued.

Sustainability Comments

Council staff have reviewed the Ecological Assessment Report and Bushfire Hazard Assessment and raise no objections the assessment and recommendations contained within. However, any removal of nests should be undertaken appropriately and it is recommended that a condition, similar to the following, be imposed as part of any development consent granted:

Active Nests – All active nest trees removed from the site are to be inspected prior to removal. Measures must be taken to ensure that active nests are treated humanely and relocated before development activities commence consistent with the National Parks and Wildlife Act 1974. A suitably qualified and experienced ecologist or wildlife carer must be present throughout

vegetation clearing activities to relocate fauna or take fauna into care where appropriate (i.e. juvenile or nocturnal fauna).

Hoping this information is of assistance and should you have any enquiries in relation to this matter, please do not hesitate to contact the undersigned on (02)4654 7777.

Yours sincerely,



Mr S L Pratt
Team Leader Statutory Planning
(Planning and Environmental Services)