

Our ref: Blessed Carlo College, Moama (SSD-24262975)

Mr Malcolm Goodwin

Proponent

The Trustees of the Roman Catholic Church for the Diocese of Wilcannia -Forbes St Laurence
Presbytery

15 Johnson Street

Forbes, NSW 2871

9 December 2022

Subject: Response to Submissions

Dear Mr Goodwin

The exhibition of the development application and environmental impact statement (EIS) for the Blessed Carlo College, Moama (SSD-24262975) ended on 07 Dec 2022.

We have placed all submissions on the NSW planning portal at
www.planningportal.nsw.gov.au/major-projects/projects.

In accordance with section 59(2) of the Environmental Planning and Assessment Regulation 2000, the Planning Secretary requires the Applicant to respond to all issues raised in these submissions and government agency advice, and where necessary, technical supporting documents must be revised.

The Department has also undertaken a preliminary assessment of the EIS and, in addition to the issues raised in agency submissions, requires the matters at **Attachment 1** be addressed in full.

You are requested to provide the Department with a response to the submissions

The written response must be in the form of a submissions report that has been prepared having regard to the State Significant Development Guidelines including Appendix C - Preparing a Submissions Report.

Please lodge your submissions report (RtS) by 6 April 2023 via the NSW planning portal <https://majorprojects.planningportal.nsw.gov.au/> or inform the Department of an alternate timeframe.

Please note that the Department is currently awaiting submissions from Murray River Council, AGL and Essential Energy in relation submitted EIS documents. This is expected to be received within the next fortnight and will be forwarded on to you.

Note that the time between the date of this letter and the date the Planning Secretary receives your response is not included in the 'assessment period' under section 94(1) of the Environmental Planning and Assessment Regulation 2021.

Department of Planning and Environment



If you have any questions, please contact Nahid Mahmud on 9995 5228 or via email at Nahid.Mahmud@dpie.nsw.gov.au.

Yours sincerely,

A handwritten signature in black ink that reads "A. Coomar".

Aditi Coomar

Team Leader

School Infrastructure Assessments

as delegate for the Planning Secretary

Attachments

1. Attachment 1- Key Issues

Attachment 1- Key Issues

1. Traffic and Transport

Traffic Assessment

The Department notes that the site has already been recognised as a school adjacent to the Arthurs Estate development and the traffic assessment is based on a comparison with the previously approved (in principle) school development on the site. The Traffic Impact Assessment Report (TIA) states the following:

- That Lignum Road cannot be widened although it acknowledges that there would be adverse traffic impacts this road.
- That residents adjacent to the site would need to travel via alternate routes during school peak times.
- That roundabouts would be delivered by 2030 and therefore payment of contributions would resolve the issue of future traffic generation.
- There are no pedestrian crossings or footpaths on the adjoining road except the pedestrian refuge to the south.

The Department has reviewed the traffic assessment with regard to the above conclusions and raises the following concerns that are required to be addressed:

- The school would be delivered in three phases and the first phase would accommodate about 120 students in 2023/2024. The TIA does not include any assessment of impacts of this phase on the surrounding developments noting that Lignum Road would not be widened, and no roundabouts delivered in 2023/2024. In this regard, the Department requires an assessment of each phase of the development where students would be accommodated including the staging, delivery of infrastructure to cater for the development additional mitigation/management measures.
- The TIA does not indicate who is responsible for delivery of the roundabout or the signalised intersection to the east. Should Council be responsible then evidence of any previous approvals, consent and/or discussions with Council should be provided to demonstrate that the roundabouts/signalise intersection would be delivered on time prior to the accommodation of full student capacity within the site. The assessment should also demonstrate that the roundabouts in conjunction with the signalisation of the nearby intersection would be suitable to cater for the school traffic in the future.
- The TIA concludes that the adjoining residents would need to use alternate routes due to queuing on Lignum Road during school hours. However, these alternate routes have not been identified and the timing of delivery of the surrounding proposed roads not provided. Such details would be needed to clearly analyse the traffic distribution, drive behaviour in the future and the alternate routes which would mitigate such impacts without impacting on other surrounding roads.

- The TIA does not include any commitments to deliver pedestrian infrastructure such as footpaths on Lignum Road and therefore does not establish that there are any safe pedestrian routes leading from the pedestrian refuge to the site. If the footpath or other infrastructure are proposed to be delivered as part of the Arthur Estate development, then specific requirements of that consent are required to be tied with this application along with details of timing of delivery of such infrastructure.

Drop-off/pick-up

- The Department notes that a pedestrian crossing is proposed through the drop-off/pick-up area. This pedestrian crossing does not lead to any continuous path. Therefore, it is unclear as to why this crossing is required. As such, due to the location of this crossing, movement of the vehicles accessing the drop-off/pick-up area would be obstructed. This in turn may lead to queuing of vehicles within this car park that would back on to the site entry/exit.
- The TIA needs to include a detailed assessment of this scenario along with queuing analysis, impacts on the drop-off/pick-up zone as well as the site entry/exit. The suitability of the proposed number of spaces for drop-off/pick-up should be assessed in detail including the following:
 - the peak school drop-off/pick-up times (morning and afternoon) based on evidence of other schools.
 - the expected number of vehicles that would use the drop-off/pick-up facility.
 - the dwell time for each vehicle at the drop-off/pick-up space.
 - based on the total number of spaces provided and the dwell time of each vehicle, assess the total vehicle turn around in this zone in the morning and afternoon.
 - establish that the proposed number of spaces are suitable to cater for the development.

Bus bay design

- Three bus bays have been proposed with anticipated north to south movements along Lignum Road. However, the Department considers that a considerable population would travel from the Moama CBD (to the south-east). The TIA does not include any school bus route from this direction, nor does it demonstrate how these buses travelling from the south would turn into the bus bay within the site and then travel to the south. In this regard details of bus movements (directional) to and from the site would be needed along with assessment of the adequacy of right-turn or U-turn movements. Additionally, safe crossing opportunities on Lignum Road for the students would also be needed.

- Otherwise the bus routes should be delineated to demonstrate that bus movements would be restricted to the frontage of the school only to avoid students crossing and buses taking right-turns.

Loading dock

- The loading dock and service vehicle location is only suitable for buildings A, B and C. It is not clear how the loading dock/ service vehicle would serve for the building D and other works at the rear of the property. This is required to be addressed.

Construction traffic management

- The construction traffic management plan (CTMP) should acknowledge that the students would be accommodated in phases and include an assessment of the mitigation measures that would be in place to ensure existing students in the school are not impacted by the construction on the site.
- The CTMP should also include an assessment of cumulative impacts of construction work in relation to Arthurs Estate development.

Community use

- The addendum to the TIA should include a brief (in principle) assessment of the traffic impacts of the usage of the site on the weekend (including a worst case scenario for community use of the sports oval/performance hall) on the surrounding residential areas.

Errors

- The TIA states that the school would be accommodate 360 students whereas the proposal is for 390 students. the TIA should be amended to include correct student numbers.
- Table 5 “Stage of development” in the TIA indicates that the proposed school would be developed over 3 phases and on the other hand, the table 1 ‘Stage of development” in the Green Travel Plan (GTP) states the development would be in over 4 phases. All reports should be amended to be consistent and reflect correct numbers.

2. Staging and comparison with Arthurs Estate development infrastructure delivery

Given that the proposal is reliant in many ways on the Arthurs Estate Development Plan, a clear table and assessment would be required to compare the staging of the Arthurs Estate (stages 1 – 11) and the school (stages 1 – 4) to establish the timing of delivery of various infrastructure upon which the school relies These include (but not limited to):

- **Timing** – a comparison of the staging and timing of delivery of the subdivision and the school.

- **Pedestrian walkway/accessway** - Timing of delivery of the walkway immediately south of the site along with the ownership details of this walkway (noting that this forms a part of the Arthurs Estate development plan). This is required as the application relies on this walkway/accessway to provide pedestrian connections to the south of the site.
- **Sewer connection** - Timing of delivery of the sewerage system and the authority responsible for the delivery of this sewerage would be required. The site is currently unsewered and therefore the assessment related to the school cannot progress prior to evidence being provided regarding the certainty of the sewer connection. If sewer connection is not or cannot be provided, then the following would be required:
 - detailed soil capability study.
 - details of on-site sewerage management.
 - details of any pump-out system proposed.
- **Stormwater connection** – The proposal relies on connecting the stormwater from the site a dam through adjoining allotments. In order to connect the site to this stormwater system, easements through multiple privately owned properties within the Arthurs Estate Development would be needed. The assessment cannot progress unless details of the required easement, timings of such connection and the timing of availability of the drainage infrastructure is provided.

Information is also required regarding the future of the dam (as in whether there are any plans to fill the dam or whether discussions have been held with Council regarding the adequacy of this proposed connection).

3. Built form

- The proposed Building C and D would encroach into the green corridor identified by the Moama Northwest Masterplan which has been preserved for opportunity for revegetation. You are required to address this issue and either amend the building layout or justify why this would be acceptable.
- The Department has reviewed the comments from the State Design Review Panel (SDRP) in its meetings (1 and 2). In the SDRP 2 meeting, the panel required that the pedestrian movements on the southern side and related matters be clarified through amended design. However, the Department notes that most of the responses state “Noted and forwarded to the design team for consideration”.
- The RtS needs to include an amended Architectural Design Report which provides clear explanation of the design response to the comments from SDRP in the previous meetings.

- The Department also recommends that further consultation be undertaken with the SDRP to ensure that the design related issues are resolved and support from the panel is obtained with respect to the site planning and layout.

4. Open Space provision

- The proposal would be delivered in four construction phases. In this regard the Department notes that the main open spaces and fields would be delivered in phase 4.
- Consequently, the Department requires you to provide details of the provision on open space and play spaces in each construction stage to demonstrate that at each operational phase the students have sufficient play space within the site complying with the 10sqm/student requirement of the Department of Education's Facilities Guidelines.

5. Tree removal and native vegetation/ Biodiversity

- The proposed trees along with the southern boundary would likely encroach into the southern boundary line. You must revise the landscape plans to demonstrate that all trees are located within the site boundaries and are appropriately setback from the car park to ensure their long term health and longevity.
- As indicated above, a landscape buffer would be required along the southern side of the internal roundabout internal to provide an appropriate interface with the future residences to the south.
- The Department agrees with the concerns raised by the Environment and Heritage Group and requires you to respond to each of the concerns in the RtS.

6. Flood

- The site is not identified as flood prone land in the Murray Local Environment Plan 2011 (LEP), however is identified on the 'rural floodplain' in the MDCP 2012 Structure Plan. In this regard, as required by the Secretary's Environmental Assessment Requirements (SEARs), please provide evidence of any consultation that has been undertaken with Council to ascertain flooding impacts of the development.
- EHG have also indicated that the flood assessment does not comply with the SEARs requirements and additional assessment should be undertaken in this regard. The Department requires you to comply with the comments from EHG with regard to flooding assessment.

7. Noise

- The noise assessment should include a plan showing the identified sensitive receivers around the site.
- The noise assessment is required to be amended to include an assessment of the noise generated by the car park on the future residents immediately to the south. Should the noise assessment conclude that it would adversely impact on the nearby sensitive

receivers then additional mitigation measures such as increase in car park set back or an acoustic barrier would be required and should be detailed in the amended architectural plans.

- The noise assessment should include a brief (in principle) assessment of the usage of the site on the weekend (including community use of the sports oval/performance hall) on the nearby identified sensitive receivers.

8. Architectural plans and landscaping

The car parking along with the southern boundary should be further set back from the boundary to ensure opportunities for landscaping and denser screening at the interface with the neighbouring properties.

The architectural plans/RtS should include details of the Chapel marked in the site plan.

- The internal roundabout has near-zero setback from the property. The site plan should be amended to provide a setback of this roundabout to the southern boundary to increase safety and provide opportunities of landscaping at the interface.
- The EIS refers to “Building 1, 2 and 3”. On the other hand, all drawings showing Building A, B and C. Please revise architectural drawings to rename the buildings to be consistent with the EIS.

9. Quantity Surveyor’s Report

- The RtS should include a statement certifying the qualifications and profession memberships (AIQS member or RIQS chartered) of the quantity surveyor who has prepared the Quantity Surveyor’s Report.

10. Community use

- The proposed development does not indicate details of the community use of the school facilities. While it is recognised that details of the proposed community use cannot be provided for this site (given its location and surroundings), you should provide details of anticipated community use of the facilities and the hours (weekdays and weekends) as a worst case scenario.

11. Assessment

- The EIS references the Riverina Murray Regional Plan (RMRP) 2036. In this regard, the RtS must provide a reference to the Draft RMRP 2041 and analyse the development against relevant objectives.